

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MIDWEST ATHLETICS AND SPORTS
ALLIANCE LLC

Plaintiff,

v.

RICOH USA, INC.

Defendant.

Civil Action No.:

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL REQUESTED

Plaintiff Midwest Athletics and Sports Alliance LLC (“MASA”) files this Complaint for Patent Infringement and Jury Demand against Defendant Ricoh USA, Inc. (“Defendant” or “Ricoh”) and alleges as follows:

THE PARTIES

1. MASA, a wholly-owned subsidiary of Midwest Youth A&S, Inc. (a Delaware public benefit corporation), is a Delaware limited liability corporation with its principal place of business at 1321 Jones Street, Suite 206, Omaha, NE 68102.

2. MASA provides services, funding and equipment for youth sports organizations to help those organizations inspire youths in a positive way and promotes the value and importance of sports and physical activity in the development of children. MASA believes in the principles of positive coaching and mentorship to not only ensure that each child learns the skills, tactics and strategies of the game but also learns the value of sportsmanship, problem-solving and leadership skills. MASA’s ultimate purpose is to see that every child has the ultimate sports experience and learns key life lessons that will be instrumental for them now and in the future.

3. Ricoh is an American corporation that sells document solutions and services, and document technology products.

4. Ricoh is an Ohio corporation, with its principal place of business at 300 Eagleview Blvd, Exton, Pennsylvania, 19341. Ricoh's registered agent in Pennsylvania is C T Corporation System, 600 N 2nd St Ste 401 Harrisburg PA 17101 Dauphin.

JURISDICTION AND VENUE

5. This action arises under the Patent Act, 35 U.S.C. § 101 *et seq.* This Court has original jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1338.

6. This Court has personal jurisdiction over Defendant. Defendant does business in this District and has, and continues to, infringe MASA's patents (described below) in this District. In addition, the Court has personal jurisdiction over Defendant because Defendant has established minimum contacts with the forum and the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice.

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b) and (c) and/or 1400(b).

8. Venue is proper because Ricoh has committed acts of patent infringement within the District and has a regular and established place of business located in the State of Pennsylvania.

9. Ricoh has committed acts of patent infringement in Pennsylvania, and throughout the United States, because it makes, uses, sells, offers for sale, and/or imports in Pennsylvania the Accused Products (identified below).

Ricoh has a regular and established place of business located in the State of Pennsylvania. For example, Ricoh maintains corporate offices and/or a place of business located at 300 Eagleview Boulevard, Exton PA, 19341. Furthermore, Ricoh's website indicates that it maintains full service sales dealers at 1265 Drummer Lane Suites 200 & 300, Wayne PA, 19087

and at 1717 Langhorne Newton Road One Summit Square, Langhorne PA, 19047. Ex. 4 (PDF of <https://www.ricoh-usa.com/en/officelocator#dvResultSet>).

THE PATENTS-IN-SUIT

10. MASA owns the following United States Patents: 6,718,285, 7,502,582, and 7,720,425 (collectively referred to as the “MASA Patents”).

11. On April 6, 2004, U.S. Patent No. 6,718,285 (“the ‘285 Patent”), entitled OPERATOR REPLACEABLE COMPONENT LIFE TRACKING SYSTEM, was issued to Thomas Leonard Schwartz, Richard Robert Tilney Carling, and Kenneth Thomas Doty. A true and correct copy of the ‘285 Patent is attached to this Complaint as Exhibit 1 and is incorporated by reference herein.

12. All rights, title, and interest in the ‘285 Patent have been assigned to MASA, who is the sole owner of the ‘285 Patent.

13. The ‘285 Patent’s abstract states that this patent is generally directed to operator replaceable component devices that enable an operator that is not a skilled field engineer or service technician, to perform maintenance on a digital printing system, resulting in significantly higher uptime for the press.

14. On March 10, 2009, U.S. Patent No. 7,502,582 (“the ‘582 Patent”), entitled METHOD AND APPARATUS FOR PRINTING USING A TANDEM ELECTROSTATOGRAPHIC PRINTER, was issued to Yee S. Ng and Robert C. Logel. A true and correct copy of the ‘582 Patent is attached to this Complaint as Exhibit 2 and is incorporated by reference herein.

15. All rights, title, and interest in the ‘582 Patent have been assigned to MASA, who is the sole owner of the ‘582 Patent.

16. The '582 Patent's abstract states that this patent is generally directed towards a tandem color electrostatographic printer apparatus having five or more color printing stations or modules for applying respective color separation toner images to a receiver member to form a pentachrome color image in a single pass.

17. On May 18, 2010, U.S. Patent No. 7,720,425 ("the '425 Patent"), entitled **METHOD AND APPARATUS FOR PRINTING USE A TANDEM ELECTROSTATOGRAPHIC PRINTER**, was issued to Yee S. Ng and Robert C. Logel. A true and correct copy of the '425 Patent is attached to this Complaint as Exhibit 3 and is incorporated by reference herein.

18. All rights, title, and interest in the '425 Patent have been assigned to MASA, who is the sole owner of the '425 Patent.

19. The '425 Patent's abstract states that this patent is generally directed towards a tandem color electrostatographic printer apparatus having five or more color printing stations or modules for applying respective color separation toner images to a receiver member to form a pentachrome color image in a single pass.

THE ACCUSED PRODUCTS

20. Ricoh makes, uses, sells, offers for sale, and/or imports into the United States and this District a variety of office equipment, including printers, scanners, and/or multifunction systems that include functionality such as printing, scanning and copying (the "Ricoh Office Equipment").

21. The Ricoh Office Equipment includes a variety of models, including those referred to as Pro C5300S/5310S, Pro 8300S/8310/8310S/8320/8320S, Pro C7200/C7200S/C7200E/C7200X/C7210/C7210S /C7210X/C7210SX, and Pro C9200/C9210, (the

“Accused Products”). Ricoh makes, uses, sells, offers for sale, and/or imports into the United States and this District these models. These Accused Products use one or more of the MASA Patents.

22. A depiction of the Pro C5300S/5310S is provided below:



Ex. 5 (Pro C5300s/C5310s Brochure)

23. A depiction of the Pro 8300S/8310/8310S/8320/8320S is provided below:



Ex. 6 (Brochure - Pro 8300s-8310s-8320s-8310-8320)

24. A depiction of the Pro C7200/ C7200S/C7200E/C7200X/C7210/C7210S /C7210X/C7210SX is provided below:



Ex. 7 (Brochure - RICOH Pro C7200 Series).

25. A depiction of the Pro C9200/C9210 is provided below:



Ex. 8 (Pro C9200-C9210 – Brochure)

COUNT I

(Direct Infringement of the ‘285 Patent pursuant to 35 U.S.C. § 271(a))

26. MASA repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

27. Defendant has infringed and continues to infringe one or more claims of the ‘285 Patent, including at least claims 1, 2, 5, and 14 in violation of 35 U.S.C. § 271(a).

28. Defendant’s infringement is based upon literal infringement or infringement under the doctrine of equivalents, or both.

29. Defendant’s acts of making, using, importing, selling, and/or offering for sale infringing products and services have been without the permission, consent, authorization, or license of MASA.

30. Defendant’s infringement includes the manufacture, use, sale, importation and/or offer for sale of Defendant’s products and services, including at least the following models: Pro C5300S, Pro C5310S, Pro 8300S, Pro 8310, Pro 8310S, Pro 8320, Pro 8320S, Pro C7200, Pro C7200S, Pro C7200E, Pro C7200X, Pro C7210, Pro C7210S, Pro C7210X, Pro C7210SX, Pro C9200, and Pro C9210, (“the ‘285 Accused Products”).

31. Claim 1 of the ‘285 Patent is recited below:

A system with operator enabled maintenance comprising:

1[a] at least one computational element within said system

1[b] a plurality of operator replaceable component (ORC) devices within said system, each of said ORC devices having an expected life span;

1[c] a use mechanism coupled to each said computational element and said ORC devices, said use mechanism tracking use of at least one of said ORC devices using a predetermined parameter;

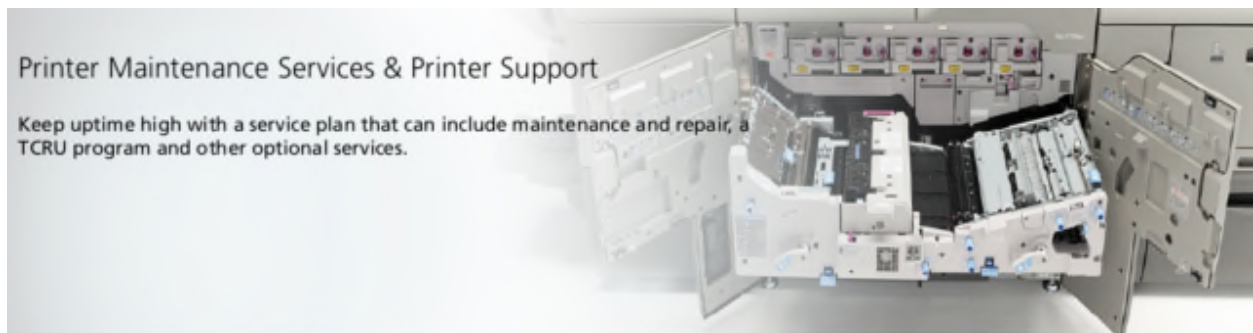
1[d] a comparison mechanism that compares use of said ORC devices to said expected life span; and

1[e] an operator alert mechanism responsive to said comparison mechanism to provide said operator alert when the result of said comparison satisfies a predetermined

parameter representing at least one of said expected life spans where said expected life span for a single of said ORC devices is the shortest expected life span.

32. The '285 Accused Products meet the limitations of claim 1 of the '285 Patent for at least the reasons described below.

33. The '285 Accused Products are systems with operator enabled maintenance because they “keep uptime high with a service plan that can include maintenance and repair, a TCRU program and other optional services).”



Ex. 9 (PDF of <https://www.ricoh-usa.com/en/services-and-solutions/commercial-industrial-printing-services/printer-maintenance-services-printer-support>)

34. Furthermore, Ricoh advertises the advantages of such systems equipped with operator enabled maintenance hardware because “A trained customer replaceable units (TCRUs) program allows you to resolve issues quickly by replacing certain parts yourself. With no need to wait for a technician to arrive, you can choose the best time to perform preventative maintenance or repairs.”



Minimize downtime with a
TCRU program

Receive training and step-by-step instructions to assure your proficiency.

A trained customer replaceable units (TCRUs) program allows you to resolve issues quickly by replacing certain parts yourself. With no need to wait for a technician to arrive, you can choose the best time to perform preventive maintenance or repairs.

Ex. 9 (PDF of <https://www.ricoh-usa.com/en/services-and-solutions/commercial-industrial-printing-services/printer-maintenance-services-printer-support>)

35. Claim limitation 1[a] is satisfied for at least the following reasons.

36. As shown below, the '285 Accused Products include computational elements.

Evidence of these computational elements can be seen by outputs of the computations shown on the display of each device, such as Ricoh @Remote, Web Image Monitor, or Smart Operation Panel, which show computation of the usage of the device in real time in order to expedite remote repairs, automate meter reads and toner orders, and other various tasks, as shown below.

Pro C5300S/Pro C5310S:

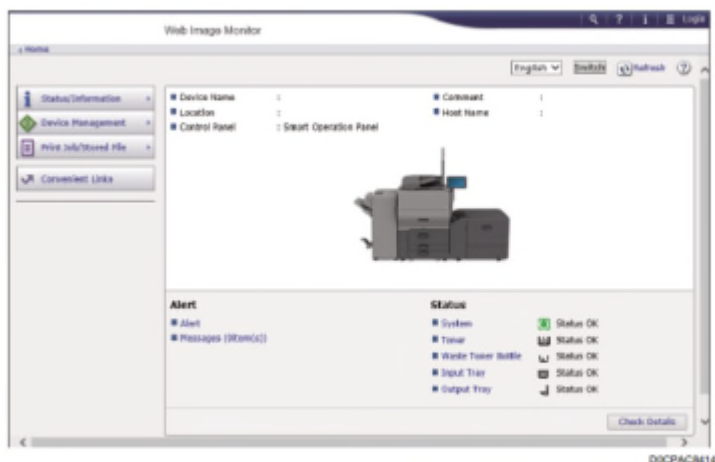
An outstanding design that delivers on every level.

Developed to be a superior product in a compact footprint, without compromise.

- Smart features include the 10" Smart Operation Panel that guides an intuitive user experience.
- Trained Customer Replaceable Units (TCRUs) allow you to execute routine maintenance on your schedule, ensuring the system is up and running when you need it most.
- Active tray indicator lights allow media to be loaded on-the-fly, increasing efficiency for longer runs and fewer interruptions.

Ex. 5 (Pro C5300s/C5310s Brochure)

2. Confirming the machine status or settings on the top page of Web Image Monitor.



The machine status and remaining amount of consumables are displayed.

Ex. 10 (Pro C5300s/C5310s Operator Guide at 185)

Pro 8300S/Pro 8310S/Pro 8310/Pro 8320S/Pro 8320:

Put total control at your fingertips

The tablet-like 17" Smart Operation Panel on the RICOH Pro 8300 Series makes it simple to exercise greater control over your output, simplify common tasks and store job settings. For seasoned operators and new staff members alike, the Android™-based control panel makes achieving the highest-quality results fast and easily repeatable. Thumbnail previews help prevent wasted prints, reducing interruptions to your workflow, and ensure that critical customer deadlines can be met. You can even view system status and operate the press remotely from a smart device, giving you even greater flexibility in managing your business.



Ex. 6 (Brochure - Pro 8300s-8310s-8320s-8310-8320)

- 8 Full-color, 17" Smart Operation Panel:** Intuitive, tablet-like performance to manage print tasks with ease. Customize the display, create presets for commonly used settings, and transition from job to job quickly from the control panel.
- 9 Attention Light:** Find out instantly from anywhere in the print center the moment the printer's status changes.

Ex. 6 (Brochure - Pro 8300s-8310s-8320s-8310-8320)

Pro C7200S/Pro C7210S/Pro C7210X/C7210SX/C7200e:

Sustain throughput because operators of varying skill levels can excel at producing simple and complex jobs

Minimize guesswork and mistakes that can lead to expensive delays and rework. Operators can customize the display of the new 17" Touch Panel based on visual guidance and programmable shortcut icons. The new Auto Calibration System generates a density change parameter and register for each type of media, thereby automating critical elements of color consistency. The new Inline Auto Registration feature prints and reads crop marks, then makes adjustment if they are needed. With support for expansive paper weights and types, the Media Library lets operators select the desired paper easily. Using the new Media Management Tool, operators can set up the media catalog from a PC and use it with multiple RICOH Pro C7200 Series printers.



Ex. 7 (Brochure - RICOH Pro C7200 Series).

Pro C9200/Pro C9210:

is just a click or call away when you need it. A nationwide parts network assures ready availability of spares to support our technicians and the TCRU program. RICOH @Remote can help maximize uptime with remote diagnosis, software upgrades and more. With people, processes and technology backing you up, you can feel confident that your investment and your future are in good hands.

Ex. 8 (Pro C9200-C9210 - Brochure)

37. Claim limitation 1[b] is satisfied for at least the following reasons. As shown below, the '285 Accused Products include several ORC components, including a charge corona unit, drum unit, drum cleaning unit, developers, paper transfer rolling unit, and image transfer belt cleaning unit, toner cartridges, waste toner bottles, photoconductor unit, fusing unit, and intermediate transfer unit. Additionally, the ORC devices each have an expected life span.

Pro C5300S/Pro C5310S:

Consumables

CMY Toner Yield 26K prints/bottle*
 K Toner Yield 31K prints/bottle*
 Waste Toner Bottle Yield 110K prints/bottle*
 *Based on 8.75% coverage (Letter)

TCRU Program Supported

Ex. 5 (Pro C5300s/C5310s Brochure)

Pro 8300S/Pro 8310S/Pro 8310/Pro 8320S/Pro 8320:

Additional Accessories

Decurl Unit DU5070, ADF Double-feed Detection Kit Type S7, Media Identification Unit Type S3, TCRU/ORU Type S11 (Set A), ORU Type S11 (Set B), PostScript3 Unit Type S11, IPDS Unit Type S11, NFC Card Reader Type S6, Optional Counter Interface Unit Type M12, IEEE802.11a/b/g/n, OCR Unit Type M13, VM Card Type P18, File Format Converter Type M18, Bridge Unit BU5010, Multi Bypass Attachment Kit for Vacuum Feed LCIT Type S9, SR5000 series Output Tray for Banner Sheet Type S6, Buffer Pass Unit Type S11, Bridge Unit BU5020, RPIP Option Interface Box Type 3

Supply Yields

Toner: 82,000 prints per bottle*

Ex. 6 (Brochure - Pro 8300s-8310s-8320s-8310-8320)

Pro C7200S/Pro C7210S/Pro C7210X/C7210SX/C7200e:


Consumables

CMYK Toner 45K prints/bottle*
 Clear Toner 24.6K prints/bottle**
 White Toner 16K prints/bottle**
 Neon Yellow Toner 23.4K prints/bottle**
 Neon Pink Toner 23.4K prints/bottle**
 Invisible Red Toner 17.3K prints/bottle**
 Waste Toner Bottle Yield: 220K prints/bottle*

*Based on 8.75% coverage (LT)

**Based on 15% coverage (LT)

TCRU Program Supported

1. Press [Counter] () at the bottom of the screen in the right.
2. To print a counter list, press [Print Counter List], and then press the [Start] key.
3. Press [Exit].

Ex. 11 (Pro 8300s-8310s-8320s-8310-8320 Operator Manual at 553-54)
Pro C7200S/Pro C7210S/Pro C7210X/C7210SX/C7200e:

0519 Display Parts Life Counter

Display the usage rate of the spare parts.

Setting Items		Description
PCU Cleaning Unit (K)	Fusing Belt Smoothing Rlr	The counter value of the replacement part is displayed. When it reaches the time to replace, a message will be shown to prompt the replacement.
Charger Unit (K)	Fuser Cleaning Unit	
Photoconductor Unit (K)	Ozone Filter (Main)	
PCU Cleaning Unit (C)	Dust Filter (Main)	
Charger Unit (C)	Tray 1	
Photoconductor Unit (C)	Tray 2	
PCU Cleaning Unit (M)	3-Tray LCIT: Tray 3	
Charger Unit (M)	3-Tray LCIT: Tray 4	
Photoconductor Unit (M)	3-Tray LCIT: Tray 5	
PCU Cleaning Unit (Y)	Bypass Tray	
Charger Unit (Y)	Interposer Upper Tray	
Photoconductor Unit (Y)	Interposer Lower Tray	
PCU Cleaning Unit (S)	2-Tray LCIT:Tray3:Fd Blt	
Charger Unit (S)	2-Tray LCIT:Tray4:Fd Blt	
Photoconductor Unit (S)	2-Tray LCIT:Tray5:Fd Blt	
ITB Cleaning Unit	2-Tray LCIT:Tray6:Fd Blt	
Paper Transfer Unit	2-Tray LCIT:Tray7:Fd Blt	
Fuser Unit	2-Tray LCIT:Tray8:Fd Blt	

Ex. 12 (Pro C7200/C7200e/C7200x/C7210/C7210x Operator's Guide at 266).

Pro C9200/Pro C9210:


Useful Information

This section describes how to check the counter value, telephone number for repairs, or ordering consumables such as toner.

Counter

The counter displays the total number of pages used by each of the functions.

You can also print out the counter information.




1. Press [Counter] () at the bottom of the screen in the right.
2. To print a counter list, press [Print Counter List], and then press the [Start] key.
3. Press [Exit].

Ex. 13 (Pro C9200-C9210 Operator's Guide at 330-31)

39. Claim limitations 1[d] and 1[e] are satisfied for at least the following reasons.

The '285 Accused Products provide an operator alert that a component needs to be replaced based on a comparison of a current usage state of the ORC device with the expected life span of the ORC device. For example, a toner cartridge of the '285 Accused Products may be assigned an LED indicator that provides an indication of an expected life span of the toner cartridge. The LED indicator is triggered based on the comparison mechanism that compares use of the toner to the expected life span of the toner. In another example, the '285 Accused Products may also display service codes (SC) or messages listed on the printer's control panel display when an ORC device is nearing the end of its expected life span. The display of the SC codes rely on a comparison mechanism that compares use of the corresponding ORC device to the expected life span of the ORC device. These status lights and display messages are shown below for each Accused Product:

Pro C5300S/Pro C5310S:

	<p>Toner is almost depleted, or has run out.</p>	<p>Prepare a replacement toner. Replace the toner when it runs out.</p> <p>See "Replacing the Toner", User Guide.</p> <p>Note</p> <ul style="list-style-type: none"> If  appears when there is a lot of toner, pull out the print cartridge by following the toner replacement procedure that is displayed on the screen, and then set it back again.
	<p>The waste toner bottle is full, or almost full.</p>	<p>Prepare a replacement waste toner bottle.</p> <p>Replace the bottle when it becomes full.</p> <p>See "Replacing the Waste Toner Bottle", User Guide.</p>

Ex. 10 (Pro C5300s/C5310s Operator Guide at 366)

When the [Check Status] Indicator Is Lit or Flashing

The [Check Status] indicator notifies the user when the machine requires immediate attention.

Flashing in red

The machine is unavailable for use. Press [Check Status] and resolve the problem as soon as possible.

Flashing in yellow

Maintenance on the machine needs to be performed soon. Perform the required procedure accordingly.

You can display the status confirmation screen with [Check Status]. On the screen, check the detailed status of the machine or application.

1. Press [Check Status].



2. Press [Check] to check the details, and perform the required procedure.

See "When an Icon is Displayed with a Message" for details.

Ex. 10 (Pro C5300s/C5310s Operator Guide at 367)

Pro 8300S/Pro 8310S/Pro 8310/Pro 8320S/Pro 8320:

Keep jobs moving full speed ahead

Use the RICOH Pro 8300 Series to print up to 8,160 impressions per hour to meet client deadlines. Add optional paper trays to load up to nine types of media for a 12,600-sheet total paper capacity to quickly transition between jobs. Reload toner and media on-the-fly with dual toner cartridges and Active Tray Indicator Lights to print without stopping. Keep your eye on system status from anywhere on the production floor via the Attention Light. Plan for and execute preventative maintenance with Trained Customer Replaceable Units (TCRUs). Perform replacements on your schedule to ensure peak performance without the need for a service technician and take advantage of greater system uptime.



Ex. 6 (Brochure - Pro 8300s-8310s-8320s-8310-8320)

8 Full-color, 17" Smart Operation Panel: Intuitive, tablet-like performance to manage print tasks with ease. Customize the display, create presets for commonly used settings, and transition from job to job quickly from the control panel.

9 Attention Light: Find out instantly from anywhere in the print center the moment the printer's status changes.

Ex. 6 (Brochure - Pro 8300s-8310s-8320s-8310-8320)

Note

- Replace the waste toner bottle if "Waste Toner Bottle is full. Replace Waste Toner Bottle." appears on the control panel.
- When the "Replacement of Waste Toner Bottle will soon be necessary." appears on the control panel, the waste toner bottle should be replaced soon. Prepare a new waste toner bottle.

Ex. 11 (Pro 8300s-8310s-8320s-8310-8320 Operator Manual at 539)

Pro C7200S/Pro C7210S/Pro C7210X/C7210SX/C7200e:

Note

- Replace the waste toner bottle if "Waste Toner Bottle is full. Replace Waste Toner Bottle." appears on the control panel.
- When the "Replacement of Waste Toner Bottle will soon be necessary." appears on the control panel, the waste toner bottle should be replaced soon. Prepare a new waste toner bottle.

Ex. 12 (Pro C7200/C7200e/C7200x/C7210/C7210x Operator's Guide at 402.)

Lamp	Status
The top lamp flashes yellow.	<p>Warning (Example)</p> <ul style="list-style-type: none"> • Toner has nearly run out. • Waste toner bottle is nearly full. <p>Read the message on the display panel, and then take appropriate action. For details, see page 345 "When Messages Appear".</p>

Ex. 12 (Pro C7200/C7200e/C7200x/C7210/C7210x Operator’s Guide at 74).

Pro C9200/Pro C9210:

Note

- If "A toner cartridge is empty." and "Replace the cartridge." appear alternately, the machine will soon stop printing. Replace the toner to maintain print quality.
- You can check the name of the required toner and the replacement procedure using the [Add Toner] screen.
- You can change the toner containers during printing.
- Press the [Check Status] key to check contact number where you can order supplies. See page 331 "Inquiry".
- You can add all four color toners in the same way.
- Do not remove the outer cap of the toner cartridge before shaking it. Wait until you install the toner cartridge before removing the cap.

Ex. 13 (Pro C9200-C9210 Operator’s Guide at 305)

The top lamp lights red.	<p>Error occurred (Example)</p> <ul style="list-style-type: none"> • When the service call message appears • Paper jam • Out of paper • Out of toner • Memory overflow • Waste toner bottle full <p>Read the message on the display panel, and then take appropriate action. For details, see page 272 "When Messages Appear".</p>
--------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Lamp	Status
The top lamp flashes yellow.	Warning (Example) <ul style="list-style-type: none"> • Toner has nearly run out. • Waste toner bottle is nearly full. Read the message on the display panel, and then take appropriate action. For details, see page 272 "When Messages Appear".

Ex. 13 (Pro C9200-C9210 Operator's Guide at 57-58)

40. Ricoh also infringes under the doctrine of equivalents because it meets at least, and by way of example, the following claim limitation(s) of representative Claim 1 by performing substantially the same function as this limitation, performing this function in substantially the same way as this limitation, and achieving substantially the same results as claim limitation 1[e]. For example, and without limitation, the '285 Accused Products perform substantially the same function in substantially the same way and achieve substantially the same result at least because they provide an operator alert mechanism (e.g., LED indicators, service codes, transfer belt replacement display notifications) responsive to the comparison mechanism when the result of the comparison satisfies a predetermined parameter (e.g., toner usage, charge potential, exposure potential, belt usage) representing at least one of the expected life spans of the ORC devices, and wherein the expected life span for one of the ORC devices is the shortest expected life span (e.g., the ORC device requires immediate replacement).

41. As a result of Defendant's unlawful activities, MASA has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Accordingly, MASA is entitled to preliminary and/or permanent injunctive relief.

42. Defendant's infringement of the '285 Patent has injured and continues to injure MASA in an amount to be proven at trial.

COUNT II

(Direct Infringement of the '582 Patent pursuant to 35 U.S.C. § 271(a))

43. MASA repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

44. Defendant has infringed and continues to infringe one or more claims of the '582 Patent, including at least claims 1 and 4, in violation of 35 U.S.C. § 271(a).

45. Defendant's infringement is based upon literal infringement or infringement under the doctrine of equivalents, or both.

46. Defendant's acts of making, using, importing, selling, and/or offering for sale infringing products and services have been without the permission, consent, authorization, or license of MASA.

47. Defendant's infringement includes the manufacture, use, sale, importation and/or offer for sale of Defendant's products and services, such as Ricoh Pro C7200, Pro C7200S, Pro C7200E, Pro C7200X, Pro C7210, Pro C7210S, Pro C7210X, Pro C7210SX ("the '582 Accused Products").

48. Claim 1 of the '582 Patent is recited below:

A method of printing to form colored images with improved color gamut and enhanced gloss, the method comprising:

1[a] forming a color print using five or more different color pigments which in combination form at least a pentachrome color image;

1[b] depositing a clear toner overcoat to the at least pentachrome color image, wherein the clear toner overcoat is formed as a receiver and image dependent inverse mask; and

1[c] subjecting the clear toner overcoat and the at least pentachrome color image to a gloss enhancing process.

49. The '582 Accused Products infringe at least claim 1 for at least the reasons described below.

50. A depiction of the '582 Accused Products is shown below.



Ex. 7 (Brochure - RICOH Pro C7200 Series).


51. As a general matter and as explained below, the limitations of claim 1 are satisfied. The '582 Accused Products are printers that are part of a production color system that improves the color gamut of the standard CMYK (cyan, magenta, yellow, black) palette of four colors by including a fifth color station which combines colors such as clear, white, neon yellow, and neon pink by the addition of a fifth color.

Welcome to a whole new playing field where new opportunities and increased profits are easily within your reach. Congratulations on your purchase of a RICOH Pro C7200X Series Graphic Arts Edition.

With the Ricoh 5th Color Station Kit you can now offer your clients more – and take your business further. This innovative 5th Color Kit empowers you with the ability to explore new creative applications that capture audience attention by displaying outstanding image quality and features that were not previously possible on a digital production printer.

Within the 5th Color Kit you will receive:

- Application Print Samples
- File Preparation Guide
- Sales Tip Guide
- Spiral-bound Sample Book
- Color Gamut Chart
- UV LED Flashlight

Two boxes of the Ricoh 5th Color Station Kit are shown. One box is standing upright, and the other is lying flat in front of it. Both boxes feature a colorful design with various images and the Ricoh logo. The boxes contain the items listed in the text: Application Print Samples, File Preparation Guide, Sales Tip Guide, Spiral-bound Sample Book, Color Gamut Chart, and UV LED Flashlight.

Ex. 14 (PDF of <https://ricohbusinessbooster.com/5thcolor/kit/>).

Consumables

CMYK Toner	45K prints/bottle*
Clear Toner	24.6K prints/bottle**
White Toner	16K prints/bottle**
Neon Yellow Toner	23.4K prints/bottle**
Neon Pink Toner	23.4K prints/bottle**
Invisible Red Toner	17.3K prints/bottle**
Waste Toner Bottle Yield:	220K prints/bottle*

*Based on 8.75% coverage (LT)

**Based on 15% coverage (LT)

TCRU Program

Supported

Ex. 7 (Brochure - RICOH Pro C7200 Series).

52. The '582 Accused Products also include a Duplo Ultra 300A UV Coater for improving color images by adding enhanced gloss, as shown below.

Home / Solutions / Finishing / UV Coaters

UV Coaters

Click on a finisher below to learn more about its capabilities.

Sort by: View Per Page:

Duplo Ultra 300A UV Coater

Duplo Ultra 200A UV Coater

Duplo Ultra 100A UV Coater

Ex. 15 (PDF of <http://www.riohbusinessbooster.com/solutions/finishing/uv-coaters/>).



Duplo Ultra 300A UV Coater

Hardware Information

The Ultra 300A UV Coater provide the ideal UV coating solution for any digital print environment. Heavy duty yet simple to use, the Ultra 300A applies a high quality gloss, satin, or matte finish to a wide range of offset and digitally printed applications, adding richness to colors while protecting them from scratches and scuffs.

With a coating speed of up to 148 feet (45 meters) per minute, the Ultra 300A can accommodate the output speed from most digital devices and process a variety of paper sizes, from 8.5" x 11" up to 20" x 28", up to 350 gsm. For near-line feeding, the Ultra 300A is available with the high capacity SF-200 Suction Feeder.

Features

- High speeds up to 148 feet (45 meters) per minute
- Adds gloss, matte, or satin coating
- Infrared Heating System
- UV Coating Low Detection Sensor
- Intelligent Control System for easy operation
- Infrared Heating System helps cure difficult stock
- Auto Gap prevents excess coating from smearing to backside of print

Ex. 16 (PDF of <http://www.riohbusinessbooster.com/solution/solutions/finishing/uv-coaters/duplo-ultra-300a-uv-coater/>).

53. Claim limitation 1[a] is satisfied for at least the following reasons. As shown below, the '582 Accused Products form color prints using five color pigments such as the four toners for the standard CMYK palette of four colors and a fifth toner, which may be clear toner, white toner, neon yellow toner, neon pink toner, or invisible red toner.

Consumables

CMYK Toner	45K prints/bottle*
Clear Toner	24.6K prints/bottle**
White Toner	16K prints/bottle**
Neon Yellow Toner	23.4K prints/bottle**
Neon Pink Toner	23.4K prints/bottle**
Invisible Red Toner	17.3K prints/bottle**
Waste Toner Bottle Yield:	220K prints/bottle*

*Based on 8.75% coverage (LT)

**Based on 15% coverage (LT)

TCRU Program

Supported

Ex. 7 (Brochure - RICOH Pro C7200 Series).


54. The '582 Accused Products use a fifth station to form at least a pentachrome color image such as an image which includes a fifth color.

Welcome to a whole new playing field where new opportunities and increased profits are easily within your reach. Congratulations on your purchase of a RICOH Pro C7200X Series Graphic Arts Edition.

With the Ricoh 5th Color Station Kit you can now offer your clients more – and take your business further. This innovative 5th Color Kit empowers you with the ability to explore new creative applications that capture audience attention by displaying outstanding image quality and features that were not previously possible on a digital production printer.

Within the 5th Color Kit you will receive:

- Application Print Samples
- File Preparation Guide
- Sales Tip Guide
- Spiral-bound Sample Book
- Color Gamut Chart
- UV LED Flashlight



Ex. 14 (PDF of <https://ricohbusinessbooster.com/5thcolor/kit/>).

55. Claim limitation 1[b] is satisfied for at least the following reasons. As shown below, the fifth station of the '582 Accused Products deposits a clear toner overcoat on a paper

during a second pass of a sheet of paper onto which a fused pentachrome image was created during a first pass through the printer.

Tips and Best Practices

1. To achieve optimal image quality and system reliability, settings in the Media Library may need to be adjusted. If you should need assistance contact your local technical support.
2. Creative usage of White and Clear Toners may require more than one pass through the printer. To do so, the media must be physically moved from the output tray back to the input tray, observing proper direction and side placement.
3. One or two layers of White Toner may be applied, with the second layer providing additional opacity and/or brightness.
4. Clear Toner should be applied in a single layer only. Additional layers will not create a 3D effect, but may cause visible yellowing.
5. Clear Toner may be applied inline with CMYK as a single pass. Applying Clear Toner in two passes, with CMYK first and Clear second, may cause a slightly different gloss effect, but may also affect the CMYK color accuracy.
6. Clear and White Toners are sold by the cartridge. Printing with either White or Clear only, does not result in a click-charge.
7. An appropriate Media Catalog entry should be used for all printing of non-white media when using Clear or White Toner. Parameters in the Media Catalog will optimize settings for black, colored, transparent, silver and other non-standard media. Printing without appropriate parameter setup may result in printing errors, such as double feeds and Media jams.
8. If White and CMYK are to be applied to a sheet with no overlap, a single pass may be used. If the CMYK overlaps the White in any areas, two passes must be used, with White being applied in the first pass and the CMYK applied in the second pass.
9. A single file may not contain both a Clear channel and a White channel. If both Clear and White channels are included, the toner type not currently loaded in the machine will be printed in an alternate visible color and cannot be turned off.
10. Setting Adobe Acrobat Preferences to 'Always' Use Overprint Preview is important when printing the 5th Color. This will display the color channel as defined in the PDF and should be reviewed / validated before the print is run.

Ex. 17 (PDF of <http://www.riohbusinessbooster.com/resource-annex/5th-color-experience/5th-color-video-tutorials/>).

56. As shown below, after the pentachrome color image is fused to paper in the first pass discussed above, one may highlight selected images or specific text with the clear toner overcoat from which the receiver is formed to add an image dependent inverse mask. For example, the clear toner overcoat is formed as an inverse mask when adding a watermark or accentuating a graphic design, as shown below.

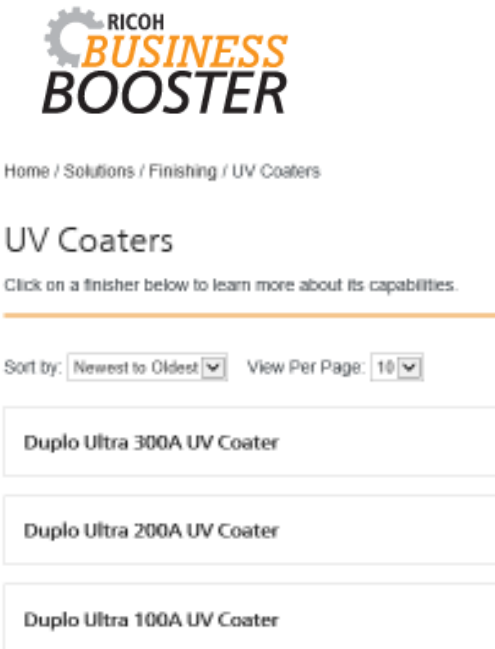
Develop new revenue streams based on fifth color capabilities

Expansive color possibilities can generate incremental revenue resulting from new applications. With the RICOH Pro C7210X and RICOH Pro C7210SX, you can develop project concepts centered on the 5th Color Station, which produces a remarkable spectrum of custom colors and special effects. The clear, white, neon yellow, neon pink and invisible red toners are catalysts for creativity. Use clear to add a watermark or accentuate a graphic design. The 5th Color Station position is swappable for purposes of applying white toner as an undercoat in one pass on colored or metallic substrates, thereby maintaining superb quality and eliminating the need for multi-pass printing. Invisible red toner allows you to expand into entry level security applications such as secure ticket printing. Both neon yellow and neon pink let you go beyond CMYK by blending with other process shades to create neon palettes.



Ex. 7 (Brochure - RICOH Pro C7200 Series).

57. Claim limitation 1[c] is satisfied for at least the following reasons. As shown below, the '582 Accused Products include subjecting the clear overcoat and at least a pentachrome color image to a Duplo Ultra 300A UV Coater to add a gloss coating.



Ex. 15 (PDF of <http://www.riohbusinessbooster.com/solutions/finishing/uv-coaters/>).



Duplo Ultra 300A UV Coater

Hardware Information

The Ultra 300A UV Coater provide the ideal UV coating solution for any digital print environment. Heavy duty yet simple to use, the Ultra 300A applies a high quality gloss, satin, or matte finish to a wide range of offset and digitally printed applications, adding richness to colors while protecting them from scratches and scuffs.

With a coating speed of up to 148 feet (45 meters) per minute, the Ultra 300A can accommodate the output speed from most digital devices and process a variety of paper sizes, from 8.5" x 11" up to 20" x 28", up to 350 gsm. For near-line feeding, the Ultra 300A is available with the high capacity SF-200 Suction Feeder.

Features

- High speeds up to 148 feet (45 meters) per minute
- Adds gloss, matte, or satin coating
- Infrared Heating System
- UV Coating Low Detection Sensor
- Intelligent Control System for easy operation
- Infrared Heating System helps cure difficult stock
- Auto Gap prevents excess coating from smearing to backside of print

Ex. 16 (PDF of <http://www.ricohbusinessbooster.com/solution/solutions/finishing/uv-coaters/duplo-ultra-300a-uv-coater/>).

58. Ricoh also infringes under the doctrine of equivalents because it meets at least, and by way of example, the following claim limitation(s) of representative Claim 1 by performing substantially the same function as this limitation, performing this function in substantially the same way as this limitation, and achieving substantially the same results as claim limitation 1[a]. For example, and without limitation, the '582 Accused Products perform substantially the same function in substantially the same way and achieves substantially the same result at least because it forms at least a pentachrome color image in a plurality of passes; for example, if a White and CMYK (cyan, magenta, yellow, black) colors are to be applied to a sheet with no overlap, White may be applied in a first pass and the CMYK may be applied in a second pass.

59. As a result of Defendant's unlawful activities, MASA has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Accordingly, MASA is entitled to preliminary and/or permanent injunctive relief.

60. Defendant's infringement of the '582 Patent has injured and continues to injure MASA in an amount to be proven at trial.

COUNT III

(Direct Infringement of the '425 Patent pursuant to 35 U.S.C. § 271(a))

61. MASA repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

62. Defendant has infringed and continues to infringe one or more claims of the '425 Patent, including at least claims 1 and 3, in violation of 35 U.S.C. § 271(a).

63. Defendant's infringement is based upon literal infringement or infringement under the doctrine of equivalents, or both.

64. Defendant's acts of making, using, importing, selling, and/or offering for sale infringing products and services have been without the permission, consent, authorization, or license of MASA.

65. Defendant's infringement includes the manufacture, use, sale, importation and/or offer for sale of Defendant's products and services, such as Pro C7200, Pro C7200S, Pro C7200E, Pro C7200X, Pro C7210, Pro C7210S, Pro C7210X, Pro C7210SX ("the '425 Accused Products").

66. Claim 1 of the '425 Patent is recited below:

In a tandem color electrostatographic printer apparatus having five or more color printing stations for applying respective color separation toner images to a receiver member, a method of forming a pentachrome color image comprising:

1[a] passing a receiver member through the printer apparatus to serially deposit thereon in a single pass at least five different colors which form various combinations of color at different pixel locations to form a pentachrome image thereon;

1[b] a first fusing step of fusing the pentachrome image by passing the receiver member through a fuser station;

1[c] passing the receiver member a second time through the printer apparatus, and depositing a clear toner overcoat to the fused pentachrome toner image; and

1[d] a second fusing step of passing the receiver member with the clear toner overcoat and fused pentachrome toner image again through the aforementioned fuser station to fix the clear toner overcoat to the receiver member.

67. The '425 Accused Products infringe at least claim 1 for at least the reasons described below.

68. A depiction of the '425 Accused Products is provided below:



Ex. 7 (Brochure - RICOH Pro C7200 Series).

69. As a general matter and as described below, the limitations of claim 1 are satisfied because the '425 Accused Products are printer apparatuses. The '425 Accused Products have at least five dry ink print stations indicative of electrostatographic printers that include the standard CMYK (cyan, magenta, yellow, black) palette of four colors and include a fifth color station which combines colors such as clear, white, neon yellow, and neon pink by the addition of a fifth color. The stations of the colored toners apply a respective color

separation toner image that is received by a receiver member, where the receiver member is a sheet of paper passing along a path to form a pentachrome color image.

Develop new revenue streams based on fifth color capabilities

Expansive color possibilities can generate incremental revenue resulting from new applications. With the RICOH Pro C7210X and RICOH Pro C7210SX, you can develop project concepts centered on the 5th Color Station, which produces a remarkable spectrum of custom colors and special effects. The clear, white, neon yellow, neon pink and invisible red toners are catalysts for creativity. Use clear to add a watermark or accentuate a graphic design. The 5th Color Station position is swappable for purposes of applying white toner as an undercoat in one pass on colored or metallic substrates, thereby maintaining superb quality and eliminating the need for multi-pass printing. Invisible red toner allows you to expand into entry level security applications such as secure ticket printing. Both neon yellow and neon pink let you go beyond CMYK by blending with other process shades to create neon palettes.



Ex. 7 (Brochure - RICOH Pro C7200 Series).

70. The ‘425 Accused Products include a fifth color of the fifth toner that could include one of the colors of clear, white, neon yellow, and neon pink.

Welcome to a whole new playing field where new opportunities and increased profits are easily within your reach. Congratulations on your purchase of a RICOH Pro C7200X Series Graphic Arts Edition.

With the Ricoh 5th Color Station Kit you can now offer your clients more – and take your business further. This innovative 5th Color Kit empowers you with the ability to explore new creative applications that capture audience attention by displaying outstanding image quality and features that were not previously possible on a digital production printer.

Within the 5th Color Kit you will receive:

- Application Print Samples
- File Preparation Guide
- Sales Tip Guide
- Spiral-bound Sample Book
- Color Gamut Chart
- UV LED Flashlight



Ex. 14 (PDF of <https://ricohbusinessbooster.com/5thcolor/kit/>).

Consumables

CMYK Toner	45K prints/bottle*
Clear Toner	24.6K prints/bottle**
White Toner	16K prints/bottle**
Neon Yellow Toner	23.4K prints/bottle**
Neon Pink Toner	23.4K prints/bottle**
Invisible Red Toner	17.3K prints/bottle**
Waste Toner Bottle Yield:	220K prints/bottle*

*Based on 8.75% coverage (LT)

**Based on 15% coverage (LT)

TCRU Program

Supported

Ex. 7 (Brochure - RICOH Pro C7200 Series).

71. Claim limitation 1[a] is satisfied for at least the following reasons. As shown below, the '425 Accused Products pass a receiver member such as a sheet of paper that through the printer along a path of five serial print stations in a single pass. "The 5th color station is swappable for purposes of applying white toner as an undercoat in one pass..." The result is a pentachrome image.

Consumables

CMYK Toner	45K prints/bottle*
Clear Toner	24.6K prints/bottle**
White Toner	16K prints/bottle**
Neon Yellow Toner	23.4K prints/bottle**
Neon Pink Toner	23.4K prints/bottle**
Invisible Red Toner	17.3K prints/bottle**
Waste Toner Bottle Yield:	220K prints/bottle*

*Based on 8.75% coverage (LT)

**Based on 15% coverage (LT)

TCRU Program

Supported

Ex. 7 (Brochure - RICOH Pro C7200 Series).

Develop new revenue streams based on fifth color capabilities

Expansive color possibilities can generate incremental revenue resulting from new applications. With the RICOH Pro C7210X and RICOH Pro C7210SX, you can develop project concepts centered on the 5th Color Station, which produces a remarkable spectrum of custom colors and special effects. The clear, white, neon yellow, neon pink and invisible red toners are catalysts for creativity. Use clear to add a watermark or accentuate a graphic design. The 5th Color Station position is swappable for purposes of applying white toner as an undercoat in one pass on colored or metallic substrates, thereby maintaining superb quality and eliminating the need for multi-pass printing. Invisible red toner allows you to expand into entry level security applications such as secure ticket printing. Both neon yellow and neon pink let you go beyond CMYK by blending with other process shades to create neon palettes.



Ex. 7 (Brochure - RICOH Pro C7200 Series).

72. Claim limitation 1[b] is satisfied for at least the following reasons. As shown below, the '425 Accused Products provide that the sheet of paper upon which there is a

pentachrome toner image is passed to a fusing station that includes a fusing belt and fusing unit for fusing the image to the sheet as it passes through the printer.

0509 Fusing Belt Manual Smoothing Adjustment

Set the conditions for manual Fusing Belt smoothing.

Setting Items	Default Value	Max. Value	Min. Value	Step	Unit
Smoothing Time: Scratch	120	60000	0	1	-
Smooth.Time: Uneven Glass	10				

0510 Fusing Belt Auto Smoothing Setting

Set the conditions for automatic Fusing Belt smoothing.

Setting Items	Selection	Default Value
Auto Exe: Belt Scratches	Normal Frequently (With Density Adj) More Frequently Most Frequently	Normal
Auto Exe: Uneven Glass	Off On	On

0511 Fusing Belt Smoothing Adjustment

Set the conditions for automatic Fusing Belt smoothing.

Setting Items	Default Value	Max. Value	Min. Value	Step	Unit
RollerSpeed: Scratch: Short	100	100	50	1	-
RollerSpeed: Scratch: Long					
Roller Speed: Uneven Glass					

0512 Fuser Unit Speed Adjustment

Perform adjustment to correct the deviation in the Fuser Unit rotation speed, and adjust the speed to an appropriate value.

This process will take approximately 5 minutes to complete. A message appears on the control panel while the process is being executed. Keep the front cover of the main unit closed until the process is completed.

Setting Items	Description
Execute	Press [Execute] to execute the function.

Ex. 12 (Pro C7200/C7200e/C7200x/C7210/C7210x Operator's Guide at 264-65).

73. Claim limitation 1[c] and 1[d] are satisfied by the '425 Accused Products. As shown below, the '425 Accused Products include a fifth station that deposits on more than one pass, such as on a second pass, a clear toner overcoat on the received member, such as a sheet of paper, after clear toner is inserted into the fifth station: "Applying Clear Toner on two passes, with CMYK first and Clear second, may cause a slightly different gloss effect..." On

this second pass, there is a second fusing step to fix the clear overcoat to the receiver member:

“Use clear to add a watermark or accentuate a graphic design.”

Tips and Best Practices

1. To achieve optimal image quality and system reliability, settings in the Media Library may need to be adjusted. If you should need assistance contact your local technical support.
2. Creative usage of White and Clear Toners may require more than one pass through the printer. To do so, the media must be physically moved from the output tray back to the input tray, observing proper direction and side placement.
3. One or two layers of White Toner may be applied, with the second layer providing additional opacity and/or brightness.
4. Clear Toner should be applied in a single layer only. Additional layers will not create a 3D effect, but may cause visible yellowing.
5. Clear Toner may be applied inline with CMYK as a single pass. Applying Clear Toner in two passes, with CMYK first and Clear second, may cause a slightly different gloss effect, but may also affect the CMYK color accuracy.
6. Clear and White Toners are sold by the cartridge. Printing with either White or Clear only, does not result in a click-charge.
7. An appropriate Media Catalog entry should be used for all printing of non-white media when using Clear or White Toner. Parameters in the Media Catalog will optimize settings for black, colored, transparent, silver and other non-standard media. Printing without appropriate parameter setup may result in printing errors, such as double feeds and Media jams.
8. If White and CMYK are to be applied to a sheet with no overlap, a single pass may be used. If the CMYK overlaps the White in any areas, two passes must be used, with White being applied in the first pass and the CMYK applied in the second pass.
9. A single file may not contain both a Clear channel and a White channel. If both Clear and White channels are included, the toner type not currently loaded in the machine will be printed in an alternate visible color and cannot be turned off.
10. Setting Adobe Acrobat Preferences to ‘Always’ Use Overprint Preview is important when printing the 5th Color. This will display the color channel as defined in the PDF and should be reviewed / validated before the print is run.

Ex. 52 (PDF of <http://www.riohbusinessbooster.com/resource-annex/5th-color-experience/5th-color-video-tutorials/>).

Develop new revenue streams based on fifth color capabilities

Expansive color possibilities can generate incremental revenue resulting from new applications. With the RICOH Pro C7210X and RICOH Pro C7210SX, you can develop project concepts centered on the 5th Color Station, which produces a remarkable spectrum of custom colors and special effects. The clear, white, neon yellow, neon pink and invisible red toners are catalysts for creativity. Use clear to add a watermark or accentuate a graphic design. The 5th Color Station position is swappable for purposes of applying white toner as an undercoat in one pass on colored or metallic substrates, thereby maintaining superb quality and eliminating the need for multi-pass printing. Invisible red toner allows you to expand into entry level security applications such as secure ticket printing. Both neon yellow and neon pink let you go beyond CMYK by blending with other process shades to create neon palettes.



Ex. 7 (Brochure - RICOH Pro C7200 Series).

74. Ricoh also infringes under the doctrine of equivalents because it meets at least, and by way of example, the following claim limitation(s) of representative Claim 1 by performing substantially the same function as this limitation, performing this function in

substantially the same way as this limitation, and achieving substantially the same results as claim limitation 1[a]. For example, and without limitation, the '425 Accused Products perform substantially the same function in substantially the same way and achieves substantially the same result at least because it serially deposits five different colors on a receiver by serially depositing five different colors on an image transfer belt unit.

75. As a result of Defendant's unlawful activities, MASA has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Accordingly, MASA is entitled to preliminary and/or permanent injunctive relief.

76. Defendant's infringement of the '425 Patent has injured and continues to injure MASA in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, MASA prays for judgment and relief as follows:

A. An entry of judgment holding Defendant has infringed and is infringing United States Patent Nos. 6,718,285, 7,502,582, and 7,720,425;;

B. An award to MASA of such damages as it shall prove at trial against Defendant that are adequate to fully compensate MASA for Defendant's infringement of United States Patent Nos. 6,718,285, 7,502,582, and 7,720,425, said damages to be no less than a reasonable royalty;

C. A finding that this case is "exceptional" and an award to MASA of its costs and reasonable attorney's fees, as provided by 35 U.S.C. § 285;

D. An accounting of all infringing sales and revenues, together with post judgment interest and prejudgment interest from the first date of infringement of United States Patent Nos. 6,718,285, 7,502,582, and 7,720,425; and

E. Such further and other relief as the Court may deem proper and just.

DEMAND FOR JURY TRIAL

MASA demands a jury trial on all issues so triable.

Respectfully submitted,

Dated: November 23, 2020

By: /s/ Richard L. Bazelon
BAZELON LESS FELDMAN PC
Richard L. Bazelon
Lisa A. Barton
One South Broad Street, Suite 1500
Philadelphia, PA 19107
Telephone: (215) 568-1155
Facsimile: (215) 568-9319
rbazelon@bazless.com
lbarton@bazless.com

**KRAMER LEVIN NAFTALIS
& FRANKEL LLP**
Paul J. Andre (to be admitted *pro hac vice*)
Lisa Kobialka (to be admitted *pro hac vice*)
990 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
pandre@kramerlevin.com
lkobialka@kramerlevin.com

*Attorneys for Plaintiff Midwest
Athletics and Sports Alliance LLC*

Mark A. Baghdassarian (to be
admitted *pro hac vice*)
Cristina Martinez (to be admitted *pro
hac vice*)
1177 Avenue of the Americas
New York, NY 10001
Tel: 212.715.9100
Fax: 212.715.8000
mbaghdassarian@kramerlevin.com
cmartinez@kramerlevin.com