

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LENTICULAR IMAGING
SOLUTIONS LLC

Plaintiff,

v.

CRANE & CO., INC.

Defendant.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Lenticular Imaging Solutions LLC (“LIS” or “Plaintiff”) files this Complaint for patent infringement against Crane & Co., Inc. for infringement of U.S. Patent No. 6,833,960 and U.S. Patent No. 6,856,462 (“the Patents-in-Suit”).

THE PARTIES

1. Plaintiff is a Texas limited liability corporation with its principal place of business located at 11 Tattersall, Laguna Niguel, California 92677.

2. Defendant Crane & Co., Inc. (“Crane” or “Defendant”) is a Massachusetts limited liability corporation with its headquarters located at 30 South Street, Dalton, Massachusetts 01226. Crane may be served through its registered agent, CT Corp. System, 155 Federal Street, Suite 700, Boston, Massachusetts 02710.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, 35 U.S.C. § 101, *et seq.* This Court's jurisdiction over this action is proper under the above statutes, including 35 U.S.C. § 271, *et seq.*, 28 U.S.C. § 1331 (federal question jurisdiction), and § 1338 (jurisdiction over patent actions).

4. Defendant is subject to personal jurisdiction in this Court. In particular, this Court has personal jurisdiction over Defendant because Defendant maintains a permanent physical presence in the Northern District of Georgia. In addition, Defendant has engaged in continuous, systematic, and substantial activities within this State.

5. On information and belief, Defendant has committed acts of infringement in this District and has one or more regular and established places of business within this District under the language of 28 U.S.C. § 1400(b). Thus, venue is proper in this District under 28 U.S.C. § 1400(b).

6. Crane maintains a permanent physical presence in the Northern District of Georgia, conducting business from at least its location at 1245 Old Alpharetta Rd, Alpharetta, GA 30005.

7. On information and belief, Defendant has conducted, and does conduct, substantial business in this forum, directly and/or through subsidiaries, agents,

representatives, or intermediaries. Such substantial business includes but is not limited to: (i) at least a portion of the infringements alleged herein; (ii) purposefully and voluntarily placing one or more infringing products into the stream of commerce with the expectation that they will be purchased by consumers in this forum; and (iii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to individuals in Georgia and in this judicial district.

THE PATENTS-IN-SUIT

8. The '960 Patent is titled, "Lenticular Imaging System."

9. The '960 Patent was duly and legally issued on December 21, 2004. A true and correct copy of the '960 Patent is attached hereto as Exhibit 1 and incorporated herein by reference. The inventions claimed in the '960 Patent relate generally to lenticular images, and more particularly to a lenticular imaging system for viewing printed images on a printed article, the lenticular imaging system creating the illusion of three-dimensional (3-D) images moving or floating across the printed article.

10. The '960 Patent is valid, enforceable and was duly issued in full compliance with Title 35 of the United States Code.

11. Each claim of the '960 Patent is presumed valid pursuant to 35 U.S.C. § 282.

12. Each claim in the '960 Patent is directed to patent eligible subject matter under 35 U.S.C. § 101.

13. The '462 Patent is titled, "Lenticular Imaging System and Method of Manufacturing Same."

14. The '462 Patent was duly and legally issued on February 15, 2005. A true and correct copy of the '462 Patent is attached hereto as Exhibit 2 and incorporated herein by reference. The inventions claimed in the '462 Patent relate generally to lenticular images, and more particularly to a lenticular imaging system for viewing printed images on a printed article, the lenticular imaging system creating the illusion of three-dimensional (3-D) images moving or floating across the printed article, as well as methods of creating printed articles.

15. The '462 Patent is valid, enforceable and was duly issued in full compliance with Title 35 of the United States Code.

16. Each claim of the '462 Patent is presumed valid pursuant to 35 U.S.C. § 282.

17. Each claim in the '462 Patent is directed to patent eligible subject matter under 35 U.S.C. § 101.

18. LIS has standing to sue for infringement of the '960 Patent and the '462 Patent.

COUNT I
(INFRINGEMENT OF U.S. PATENT 6,833,960)

19. LIS incorporates paragraphs 1 through 18 herein by reference.

20. This cause of action arises under the patent laws of the United States, and in particular, 35 U.S.C. §§ 271, *et seq.*

21. Defendant has, and continues to, directly infringe one or more claims of the '960 patent in this judicial district and/or elsewhere in Georgia and the United States, including claim 19 by, among other things, making products (such as security threads and security films) using methods that infringe the '960 Patent ("the Accused Practices").

22. Attached hereto as Exhibit 3, and incorporated herein by reference, is a claim chart detailing how Defendant's Accused Practices infringe claim 19 of the '960 Patent.

23. Plaintiff has been damaged as a result of Defendant's infringing conduct described in this Count. Defendant is, thus, liable to LIS in an amount that adequately compensates it for Defendant's infringement, which by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II
(INFRINGEMENT OF U.S. PATENT 6,856,462)

24. LIS incorporates paragraphs 1 through 23 herein by reference.

25. This cause of action arises under the patent laws of the United States, and in particular, 35 U.S.C. §§ 271, *et seq.*

26. Defendant has, and continues to, directly infringe one or more claims of the '462 patent in this judicial district and/or elsewhere in Georgia and the United States, including claims 24, 25, 26, and 27 by, among other things, engaging in the Accused Practices.

27. Attached hereto as Exhibit 4, and incorporated herein by reference, is a claim chart detailing how Defendant's Accused Practices infringe claims 24, 25, 26, and 27 of the '462 Patent.

28. Plaintiff has been damaged as a result of Defendant's infringing conduct described in this Count. Defendant is, thus, liable to LIS in an amount that adequately compensates it for Defendant's infringement, which by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

DEMAND FOR A JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues triable of right by a jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in its favor and grant the following relief:

- a. A judgment that Defendant has directly infringed one or more claims of the '960 Patent and it is liable for such infringement;
- b. A judgment that Defendant has directly infringed one or more claims of the '462 Patent and it is liable for such infringement;
- c. A judgment and order requiring Defendant to pay Plaintiff past and future damages under 35 U.S.C. § 284, including for supplemental damages arising from any continuing post-verdict infringement for the time between trial and entry of the final judgment with an accounting, as needed, as provided by 35 U.S.C. § 284;
- d. A judgment and order requiring Defendant to pay Plaintiff reasonable ongoing royalties on a going-forward basis after final judgment;
- e. A judgment and order requiring Defendant to pay Plaintiff pre-judgment and post-judgment interest on the damages award;
- f. A judgment and order requiring Defendant to pay Plaintiff's costs; and
- g. Such other and further relief as the Court may deem just and proper.

DATED: September 7, 2021

Respectfully Submitted,

By: /s/ Steven G. Hill

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