

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

PITNEY BOWES INC.,)	
)	
Plaintiff,)	Civil Action No.:
)	
vs.)	
)	
SAVIN CORPORATION,)	
RICOH CORPORATION,)	
RICOH COMPANY, LTD.,)	March 5, 2004
GESTETNER CORPORATION, and)	
LANIER WORLDWIDE, INC.)	
Defendants.)	

COMPLAINT

Plaintiff Pitney Bowes Inc. (“Pitney Bowes”), for its cause of action against defendants Savin Corporation (“Savin”), Ricoh Corporation (“Ricoh Corp.”), Ricoh Company, Ltd (“Ricoh Company”), Lanier Worldwide, Inc. (“Lanier”), and Gestetner Corporation (“Gestetner”), states and alleges as follows:

1. Plaintiff Pitney Bowes is a Delaware Corporation having its principal place of business at One Elmcroft Road, Stamford, Connecticut 06926-0070.
2. Defendant Savin is a Delaware corporation having its principal place of business at 333 Ludlow Street, Stamford, Connecticut 06902. Savin is a wholly-owned subsidiary of Ricoh Corporation.
3. Defendant Ricoh Corporation is a Delaware corporation having its principal place of business at Five Dedrick Place, West Caldwell, New Jersey 07006. Ricoh Corporation is a wholly-owned subsidiary of Ricoh Company.

4. Defendant Ricoh Company is a corporation organized under the laws of Japan having its principal place of business at 1-15-5 Minami-Aoyama, Minato-ku, Tokyo 107-8544, Japan.

5. Defendant Gestetner is a Delaware corporation having its principal place of business at 599 West Putnam Avenue, Greenwich, Connecticut 06836. Gestetner is a wholly-owned subsidiary of Savin.

6. Defendant Lanier is a Delaware corporation having its principal place of business at 2300 Parklake Drive NE, Atlanta, Georgia, 30345. Lanier is a wholly-owned subsidiary of Ricoh Corporation.

7. This is an action for patent infringement arising under the Acts of Congress relating to patents, including Title 35 United States Code § 271 and §§ 281-285. This court has subject matter jurisdiction under the provisions of Title 28 United States Code § 1338(a) and venue with respect to the defendants is within this district under the provisions of Title 28 United States Code § 1391(c) and § 1400(b).

8. On February 25, 1992, the United States Patent Office issued United States Letters patent No. 5,091,790 (the “’790 patent”), which is attached hereto as Exhibit A. The ‘790 patent is assigned to Pitney Bowes. The ‘790 patent is entitled “Multipurpose Computer Accessory for Facilitating Facsimile Communication.” The invention of the ‘790 patent was invented by Milton Silverberg.

COUNT I – RICOH CORPORATION

Infringement of U.S. Patent No. 5,091,790

9. Ricoh Corporation has manufactured, used and/or sold in this judicial district and elsewhere in the United States, computer accessories, including but not limited to the Ricoh

FAX4410NF, as well as other products that utilize this same or similar technology, that infringe at least one claim of the '790 patent.

10. The infringement by Ricoh Corporation of Pitney Bowes '790 patent has injured Pitney Bowes and will cause Pitney Bowes added injury and damage in the future unless Ricoh Corporation is enjoined from infringing said patent.

COUNT II – RICOH COMPANY

Infringement of U.S. Patent No. 5,091,790

11. Ricoh Company has manufactured, used and/or sold in this judicial district and elsewhere in the United States, computer accessories, including but not limited to the Ricoh FAX4410NF, Savinfax 3750nf, Gestetner model F104L, and Lanier model LF415e, as well as other products that utilize this same or similar technology, that infringe at least one claim of the '790 patent.

12. The infringement by Ricoh Company of Pitney Bowes '790 patent has injured Pitney Bowes and will cause Pitney Bowes added injury and damage in the future unless Ricoh Company is enjoined from infringing said patent.

COUNT III – SAVIN

Infringement of U.S. Patent No. 5,091,790

13. Savin has manufactured, used and/or sold in this judicial district and elsewhere in the United States, computer accessories, including but not limited to the Savinfax 3750nf, as well as other products that utilize this same or similar technology, that infringe at least one claim of the '790 patent.

14. The infringement by Savin of Pitney Bowes '790 patent has injured Pitney Bowes and will cause Pitney Bowes added injury and damage in the future unless Savin is enjoined from infringing said patent.

COUNT IV – GESTETNER

Infringement of U.S. Patent No. 5,091,790

15. Gestetner has manufactured, used and/or sold in this judicial district and elsewhere in the United States, computer accessories, including but not limited to model F104L, as well as other products that utilize this same or similar technology, that infringe at least one claim of the '790 patent.

16. The infringement by Gestetner of Pitney Bowes '790 patent has injured Pitney Bowes and will cause Pitney Bowes added injury and damage in the future unless Gestetner is enjoined from infringing said patent.

COUNT V – LANIER

Infringement of U.S. Patent No. 5,091,790

17. Lanier has manufactured, used and/or sold in this judicial district and elsewhere in the United States, computer accessories, including but not limited to the Lanier LF415e, as well as other products that utilize this same or similar technology, that infringe at least one claim of the '790 patent.

18. The infringement by Lanier of Pitney Bowes '790 patent has injured Pitney Bowes and will cause Pitney Bowes added injury and damage in the future unless Lanier is enjoined from infringing said patent.

JURY TRIAL DEMANDED

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

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Pitney Bowes prays for judgment as follows:

A. That defendants Ricoh Corporation, Ricoh Company, Savin, Gestetner, and Lanier are infringing, inducing others to infringe, or contributing to the infringement of United States Letters Patent No. 5,091,790;

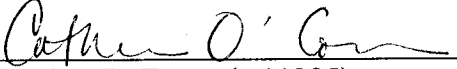
B. That the defendants and their respective agents, servants, officers, directors employees and all persons acting in concert with them, directly or indirectly, be enjoined from infringing, inducing others to infringe, or contributing to the infringement of United States Letters Patent No. 5,091,790;

C. That the defendants be ordered to account for and pay to Plaintiff Pitney Bowes, through an accounting or otherwise, the damages to which Pitney Bowes is entitled as a consequence of the infringement;

D. That Plaintiff Pitney Bowes be awarded its costs and attorneys' fees herein in accordance with Title 35 United States Code § 285; and

E. That Plaintiff Pitney Bowes be awarded such other and further relief as the Court may deem just and equitable.

PITNEY BOWES INC.

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Dated: March 5, 2004