UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PAPST LICENSING GmbH & Co. KG
Plaintiff,

v.

EASTMAN KODAK COMPANY

Defendant.

Civil Action No.

TC

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Papst Licensing GmbH & Co. KG ("Papst Licensing"), by and through counsel, for its Complaint against defendant Eastman Kodak Company (“Kodak”), states as follows:

JURISDICTION AND VENUE

1. This Court has federal question jurisdiction of Papst Licensing’s patent infringement claims pursuant to 28 U.S.C. §1331 and 1338(a) because this action arises under the patent laws of the United States. 35 U.S.C. §§ 1, *et seq.*

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(c), 1391(d) and 1400(b).

3. Papst Licensing is a company existing under the laws of The Federal Republic of Germany with its principal place of business headquartered at Bahnofstrasse 33, 78112 St. Georgen, Germany.

4. Upon information and belief, Kodak is located at 343 State Street, Rochester, New York 14650 and regularly transacts business in this district as it is registered to do business in

Illinois, maintains a registered in Illinois and maintains a regional office at 935 North Plum Grove Road, Suite B. Schaumburg, IL 60173.

FACTS GIVING RISE TO THIS ACTION

5. The patents listed in Paragraphs Nos. 6and 7 below cover, *inter alia*, various aspects of digital cameras. Unless otherwise specified, the said patents are collectively referred to hereinafter as the "Patents in Suit." Papst Licensing is the lawful owner, by assignment, of the entire right, title, and interest in and to each and every one of the Patents in Suit.

6. United States Patent No. 6,470,399 B1 duly and legally issued on October 22, 2002.

7. United States Patent No. 6,895,449 B2 duly and legally issued on May 17, 2005.

8. A reasonable opportunity for further investigation or discovery is likely to provide evidentiary support that Kodak has made, used, sold or offered to sell to numerous customers in the United States or have imported into the United States digital cameras which infringe the Patents in Suit.

9. A reasonable opportunity for further investigation or discovery is likely to provide evidentiary support that Kodak has actively induced others and/or contributed to the infringement of the Patents in Suit.

10. A reasonably opportunity for further investigation or discovery is likely to provide evidentiary support that Kodak has committed said infringements willfully.

11. Papst Licensing has given written notice of infringement to Kodak.

12. Upon information and belief, Kodak has been and is still committing the said infringements and will continue to do so unless enjoined by this Court.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues triable by jury as of right.

REQUESTED RELIEF

WHEREFORE, Papst Licensing respectfully requests the following relief

1. The entry of judgment in favor of Papst Licensing, and against Kodak, finding that Kodak has infringed the Patents in Suit;

2. The entry of judgment in favor of Papst Licensing, and against Kodak, awarding Papst Licensing damages adequate to compensate it for Kodak' acts of infringement;

3. The entry of judgment in favor of Papst Licensing, and against Kodak, awarding Papst Licensing all applicable interest (including pre-judgment and post-judgment interest), costs, an increase of damages to three times the amount of damages found or assessed, and attorneys' fees;

4. The entry of a permanent injunction enjoining Kodak, and all those acting in concert with them, from further acts of infringement; and

5. Such other and further relief as the Court deems just and proper.

June 25, 2008

Respectfully submitted,

/s/ Jerold B. Schnayer
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