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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
6-15-07
JUN 15 2007
JUN 15 2007
MICHAEL W. DOBBINS

PAPST LICENSING GmbH & Co. KG
Plaintiff,

v.

FUJIFILM Corporation, FUJIFILM U.S.A.,
Inc.
Defendants

07cv3401
JUDGE HOLDERMAN
MAG. JUDGE ASHMAN

C
DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Papst Licensing GmbH & Co. KG ("Papst Licensing"), by and through counsel, for its Complaint against defendants FUJIFILM Corporation ("FUJIFILM"), and FUJIFILM U.S.A., Inc. ("FUJIFILM USA") (collectively "the FUJIFILM Defendants"), 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 the Northern District of Illinois, Eastern Division 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 Bahnhofstrasse 33, 78112 St. Georgen, Germany.

4. Upon information and belief, FUJIFILM is a multinational corporation having an established and on-going business throughout the United States, and particularly, transacts

business in this district through a sales office of FUJIFILM USA which is located at 850 Central Avenue, Hanover Park, Illinois 60133.

5. Upon information and belief, FUJIFILM USA is a wholly-owned subsidiary of FUJIFILM.

FACTS GIVING RISE TO THIS ACTION

6. The patents listed in Paragraphs Nos. 7 and 8 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.

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

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

9. A reasonable opportunity for further investigation or discovery is likely to provide evidentiary support the FUJIFILM Defendants have 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.

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

11. A reasonable opportunity for further investigation or discovery is likely to provide evidentiary support that the FUJIFILM Defendants committed said infringements willfully.

12. Papst Licensing has given written notice of infringement to the FUJIFILM Defendants.

13. Upon information and belief, the FUJIFILM Defendants have been and still are committing the said infringements and will continue to do so unless enjoined by this Court.

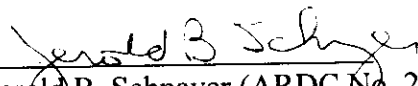
WHEREFORE, Plaintiff demands a permanent injunction against continued infringement, damages adequate to compensate for said infringements, together with all applicable interest and costs, an increase of damages to three times the amount found or assessed, attorney fees, and such other and further relief as the Court may deem just and proper and as is warranted by the evidence.

DEMAND FOR JURY TRIAL

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

June 15, 2007

Respectfully submitted,


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