

FILED

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
OCALA DIVISION

2010 AUG 12 AM 11:09

CLERK, U.S. DISTRICT COURT  
OCALA, FLORIDA

LEWIS CHURNICK

Plaintiff,

v.

Case No: 5:10-CV-383-OC-106RJ

ICING IMAGES, LLC, a Maryland  
Limited Liability Company,  
DEBORAH COUGHLIN, and  
Various JOHN and JANE DOES,

JURY TRIAL DEMANDED

Defendants.

**COMPLAINT FOR DAMAGES WITH INJUNCTIVE RELIEF SOUGHT  
AND DEMAND FOR JURY TRIAL**

Plaintiff, Lewis Churnick, sues the Defendants, Icing Images, LLC, Deborah Coughlin, and various John and Jane Does, and in support therefore, alleges as follows:

**THE PARTIES**

1. Plaintiff, Lewis Churnick is an individual residing in the state of Florida and having a corresponding address of 21051 NE Highway 27, Williston, FL 32696.

2. Defendant Icing Images, LLC is a Maryland limited liability company having a registered business address of 1217 Old Bethel Church Road, Winchester, Virginia and a principle place of business located at 161 Prosperity Drive #106, Winchester, Virginia (hereinafter "Icing Images").

3. Defendant, Deborah Coughlin is an individual residing at 1214 Old Bethel Church Road, Winchester, Virginia.

4. Defendant John and Jane Does are individuals and/or business entities whose identities and addresses are presently unknown to Plaintiff.

#### **JURISDICTION AND VENUE**

5. This is a civil action for patent infringement arising under the patent laws of the United States, namely the United States Patent Act of 1952, as amended, 35 U.S.C. §271 et seq.

6. The District Court for the Middle District of Florida has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a), as it involves substantial claims arising under the United States Patent Act of 1952, as amended, and 35 U.S.C. §271 et seq.

7. Defendant Icing Images is conducting business on a systematic and continuous basis within the United States and abroad, including the state of Florida and this judicial district.

8. Defendant Icing Images makes, imports, uses, offers to sell, and/or sells within the United States products including products which when used by Defendant and Defendant's customers infringe the patent at issue in this action. Defendant Icing Images' products are targeted to customers, such as bakeries, all over the world, including in the state of Florida and this District. The Defendant's website, [www.icingimages.com](http://www.icingimages.com) through which Defendant's goods are offered for sale and sold, is available and accessible within the Middle District of Florida. Additionally, Defendant Icing Images has, on a systematic and continuous basis, purchased goods for subsequent resale from vendors located within the State of Florida and this district.

9. Defendant Icing Images is subject to personal jurisdiction in this judicial district because it has established minimum contacts with the forum, such that the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice and is inducing others to commit acts of infringement in this judicial district.

10. Defendant Deborah Coughlin, on information and belief and at all times material hereto, a) is the founder and managing member and controls the day to day operations of Defendant Icing Images, LLC, b) controls the content of the website www.icingimages.com, and c) aided, participated in, approved, ratified and/or induced Defendant Icing Images' infringing acts as set forth herein. The courts have found that "corporate officers who actively aid and abet their corporation's infringement may be personally liable for inducing infringement under §271(b) regardless of whether the corporation is the alter ego of the corporate officer" Insituform Technologies, Inc. v. CAT Contracting, Inc., 385 F 3d 1360, 1375, C.A. Fed., 2004. See also, Power Lift, Inc. v. Lang Tools, Inc., 774 F.2d 478 (Fed.Cir.1985), and Nissim Corp. v. Clearplay, Inc., et al., 351 F.Supp.2d 1343 (S.D.FL., 2004).

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

#### **THE PATENT-IN-SUIT**

12. The Plaintiff, Lewis Churnick, owns all right, title and interest in and to United States Patent No. 7,528,985, ("the '985 Patent") entitled "Method of Image Cropping and Location Affixing For Enhanced Duplication Reproductions On Edible Media", which was duly issued by the United States Patent and Trademark Office on May 5, 2009 and

presumed valid under 35 U.S.C. §282. The '985, which is also referred to herein as "the Patent-in-Suit", at all times pertinent, was, and is, enforceable. A true and correct copy of the '985 Patent is attached to this Complaint as **Exhibit A** and is incorporated herein by reference.

### **BACKGROUND**

13. The field of art of which the '985 Patent is a part relates generally to the reproduction of high quality pictorial images on edible media using, inter alia, a stand-alone (no computer necessary) color copier/ink-jet printer. The edible media bearing the reproduced image is used to decorate foodstuffs, such as cakes, cupcakes, cookies, chocolates and the like. The edible media is typically an edible starch-based paper substantially covering a sheet of wax paper or similar "backing sheet" that is fed through the printer.

14. At least as early as February, 2005, Lewis Churnick developed methods of reproducing a pictorial image onto an edible substrate using, inter alia, a cropping tool (also known as a "masking template" or just "template") and a sheet of edible media specially adapted for use with said template.

15. Mr. Churnick (hereinafter "Plaintiff") has been awarded a United States patent covering his methods namely the '985 Patent-in-Suit.

16. Plaintiff is the owner of the entire right, title and interest in the '985 Patent.

17. Defendant Icing Images, LLC does not have a license under the '985 Patent to practice or permit others to practice the methods claimed therein.

18. Defendant Deborah Coughlin does not have a license under the '985 Patent to practice or permit others to practice the methods claimed therein.

19. Defendant Icing Images, under the auspices and control of Defendant Deborah Coughlin (together, the “II/DC Defendants”), have infringed and continue to infringe; have induced and continue to induce members of the public, presently unknown to Plaintiff, and identified herein as the Does, to infringe; and/or have committed and continue to committed acts of contributory infringement, literally or under the doctrine of equivalents, of one or more claims of the ‘985 Patent.

**DIRECT INFRINGEMENT OF THE PATENT-IN-SUIT  
BY THE II/DC DEFENDANTS**

20. Each of the foregoing paragraphs is incorporated herein by reference.

21. The II/DC Defendants have offered for sale and continue to offer for sale, sold and continue to sell, in the form of a kit or “system”, all of the components necessary to practice Plaintiff’s ‘985 Patent, said system including, inter alia, a stand-alone printer, edible ink cartridges therefore, templates and edible media specially adapted for use with said templates (together, the “Icing Images System”). A copy of a webpage of the II/DC Defendants’ website, [www.icingimages.com](http://www.icingimages.com), which offers for sale the Icing Images System is attached hereto as **Exhibit B** and incorporated herein by reference.

22. Upon information and belief, the II/DC Defendants have, part and parcel to their bakery printing supply shop business, used the Icing Images System to carry out at least one of Plaintiff’s patented methods.

23. The II/DC Defendants have profited from the commercial exploitation of Plaintiff’s patented technology.

24. By using without license the Icing Images System to carry out at least one of Plaintiff’s patented methods, the II/DC Defendants have directly infringed Plaintiff’s patent.

25. The II/DC Defendants' infringing activities have damaged and continue to damage Plaintiff. Upon information and belief, the II/DC Defendants will continue to infringe the '985 Patent, causing irreparable harm to Plaintiff unless enjoined by this Court.

**CONTRIBUTORY INFRINGEMENT OF THE PATENT-IN-SUIT  
BY THE II/DC DEFENDANTS**

26. Each of the foregoing paragraphs is incorporated herein by reference.

27. The templates and edible media components of the Icing Images System are used in practicing Plaintiff's patented methods, constitute material parts of Plaintiff's invention, and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

28. Upon information and belief, the II/DC Defendants have imported and continue to import into the United States the templates and/or edible media components of the Icing Images System.

29. The II/DC Defendants knew that the templates and edible media components of the Icing Images System are especially made or especially adapted for use in carrying out Plaintiff's patented methods.

30. By offering to sell and/or selling within the United States, and/or importing into the United States, the aforesaid material and/or apparatus for use in practicing Plaintiff's patented method without license the II/DC Defendants have contributed to the infringement of Plaintiff's '985 Patent.

**INDUCEMENT TO INFRINGE THE PATENT-IN-SUIT  
BY THE II/DC DEFENDANTS**

31. Each of the foregoing paragraphs is incorporated herein by reference.

32. Upon information and belief, the II/DC Defendants include with the sale of each Icing Images System, instructions for using the Icing Images System for practicing Plaintiff's patented methods.

33. The II/DC Defendant knew and intended that the templates and edible media components would be used by its customers to carry out Plaintiff's patented methods.

34. By selling the Icing Images System generally, and the template and edible media components thereof in particular, and by providing instructions for using them for carrying out Plaintiff's patented methods, the II/DC Defendants have induced members of the public, the Does, to infringe Plaintiff's '985 Patent.

**DIRECT INFRINGEMENT OF THE PATENT-IN-SUIT  
BY THE DOE DEFENDANTS**

35. Each of the foregoing paragraphs is incorporated herein by reference.

36. Upon information and belief the Does have used and continue to use the Icing Images System to carry out at least one of Plaintiff's patented methods without license.

37. By using without license the Icing Images System to carry out at least one of Plaintiff's patented methods, Does have directly infringed Plaintiff's patent.

**NOTICE, KNOWLEDGE AND WILLFULNESS**

38. Each of the foregoing paragraphs is incorporated herein by reference.

39. Plaintiff or its authorized licensees have complied with all applicable provisions of 35 U.S.C. § 287 regarding marking and notice of the Patent-in-Suit.

40. The II/DC Defendants' infringement has occurred with knowledge of the Patent-in-Suit and willfully and deliberately in violation of 35 U.S.C. § 284.

41. For example, the II/DC Defendants were given actual notice of the Patents-in-Suit on or about March 25, 2010 and July 24, 2010, when Plaintiff and Plaintiff's legal representative, respectively, sent notices of the Patent-in-Suit to the II/DC Defendants.

42. Even after receiving the March 25, 2010 and July 24, 2010 letters and subsequent follow-up correspondence by Plaintiff's counsel, the II/DC Defendants have failed to adequately respond to Plaintiff's allegations of infringement and, upon information and belief, have not taken necessary steps to avoid infringement.

43. Instead, the II/DC Defendants have continued to infringe, and have continued to induce others to infringe, the Patent-in-Suit, in an objectively reckless manner, with complete disregard of Plaintiff's rights in the Patent-in-Suit. Such willfulness makes this a special case as to damages, allowing triple damages in addition to attorney's fees and costs.

#### **PRAYER FOR RELIEF**

WHEREFORE, PLAINTIFF CHURNICK respectfully prays for judgment and relief as follows:

1. A judgment that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, the '985 Patent in violation of 35 U.S.C. § 271;

2. An award of compensatory damages adequate to compensate Plaintiff for Defendants' infringement of the '985 Patent in an amount no less than a reasonable royalty, in a sum to be determined at trial;

3. A permanent injunction preventing Defendant Icing Images, its principles, officers, agents, servants, employees and attorneys, and other persons in active concert or



participation with Icing Images from further infringement of the '985 Patent;

4. An order that Defendant Icing Images deliver to Plaintiff for destruction all materials and apparatus in Defendant's possession especially made or especially adapted for use in carrying out Plaintiff's patented methods;

5. Alternatively, a continuing royalty sufficient to compensate Plaintiff for any future infringement of the '985 Patent;

6. A declaration that this case is exceptional pursuant to 35 U.S.C. § 285;

7. An award of treble damages pursuant to 35 U.S.C. § 284;

8. An award of Plaintiff's cost, expenses, and attorneys' fees incurred in bringing and prosecuting this action pursuant to 35 U.S.C. § 285;

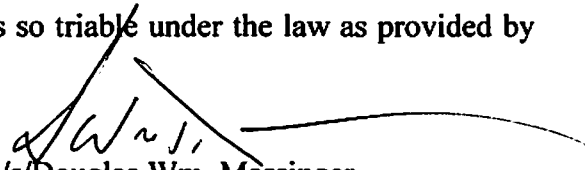
9. An award of pre-judgment interest; and

10. Any other relief to which this Court deems Plaintiff is entitled in law or in equity.

#### **DEMAND FOR JURY TRIAL**

Plaintiff requests a trial by jury on all issues so triable under the law as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

Dated: August 12, 2010

  
/s/ Douglas Wm. Massinger

**Douglas Wm. Massinger**

Fla. Bar No. 855,391

**MASSINGER LAW OFFICES**

887 NE 100 Street

Ocala, FL 34479

(352) 351-0351 (Ph)

(352) 351-0359 (Fx)

massinger@idealawfirm.com

***Counsel for Plaintiff***

# **EXHIBIT A**



US007528985B2

(12) **United States Patent**  
**Churnick**

(10) **Patent No.:** **US 7,528,985 B2**  
(45) **Date of Patent:** **May 5, 2009**

(54) **METHOD OF IMAGE CROPPING AND LOCATION AFFIXING FOR ENHANCED DUPLICATION REPRODUCTIONS ON EDIBLE MEDIA**

(76) **Inventor:** Lewis Churnick, 21029 NE Hwy 27, Williston, FL (US) 32696

(\*) **Notice:** Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 737 days.

(21) **Appl. No.:** 11/063,874

(22) **Filed:** Feb. 24, 2005

(65) **Prior Publication Data**

US 2005/0271782 A1 Dec. 8, 2005

**Related U.S. Application Data**

(60) Provisional application No. 60/576,456, filed on Jun. 3, 2004.

(51) **Int. Cl.**  
*H04N 1/40* (2006.01)

(52) **U.S. Cl.** ..... 358/1.18; 358/500

(58) **Field of Classification Search** ..... 358/1.9, 358/2.1, 1.18, 537, 468, 1.2, 1.6, 500, 505  
See application file for complete search history.

(56) **References Cited**

**U.S. PATENT DOCUMENTS**

4,910,661 A *	3/1990	Barth et al. ....	700/66
5,017,394 A *	5/1991	Macpherson et al. ....	426/302
6,030,134 A *	2/2000	Stewart .....	400/600.2
6,147,743 A *	11/2000	Fredlund et al. ....	355/29
6,299,374 B1 *	10/2001	Naor et al. ....	401/198
6,582,742 B2 *	6/2003	Stewart .....	426/383
7,286,258 B2 *	10/2007	Schnoebelen et al. ....	358/1.18

\* cited by examiner

*Primary Examiner*—Thomas D Lee  
*Assistant Examiner*—Stephen M Brinich

(57) **ABSTRACT**

This method utilizes a template as a tool for cropping an image and locating it at specific coordinates on a copier or other image reproduction device using edible ink, utilizing the device's enlargement feature to size & place the reproduction printout at a precise position on the output page. It is also used in conjunction with the device's tile printing or "image repeat" feature to reproduce multiples of the original image with precise size & placement of the multiple output reproductions on edible media for use in decorating food-stuffs.

**19 Claims, 4 Drawing Sheets**

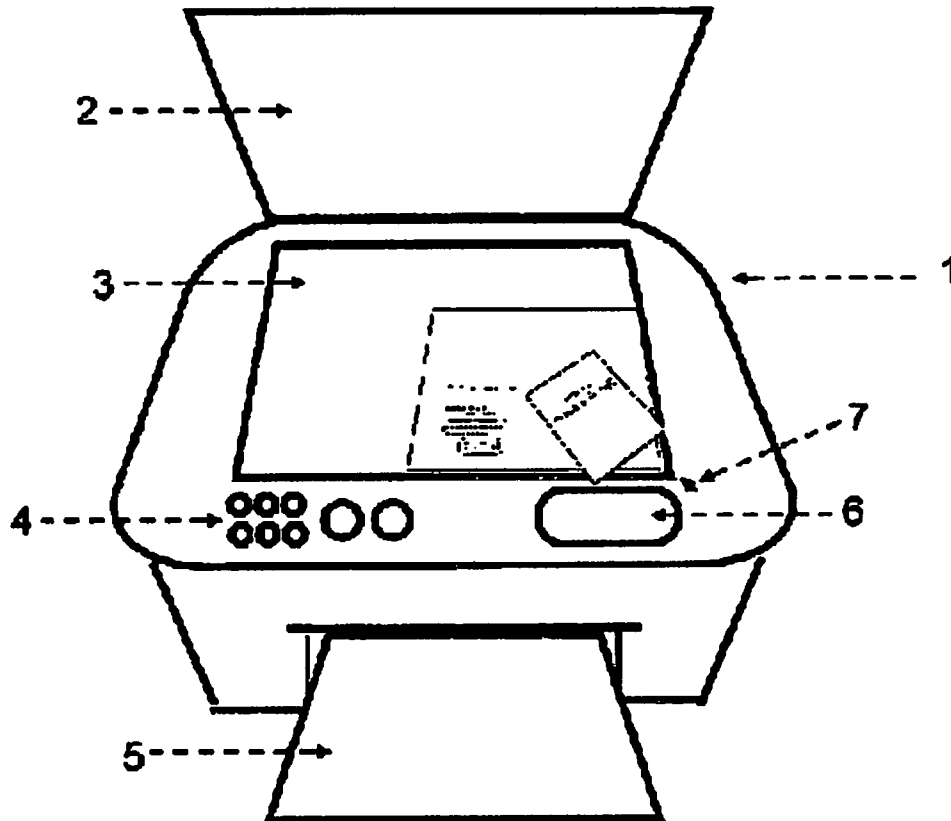


EXHIBIT A

Figure 1

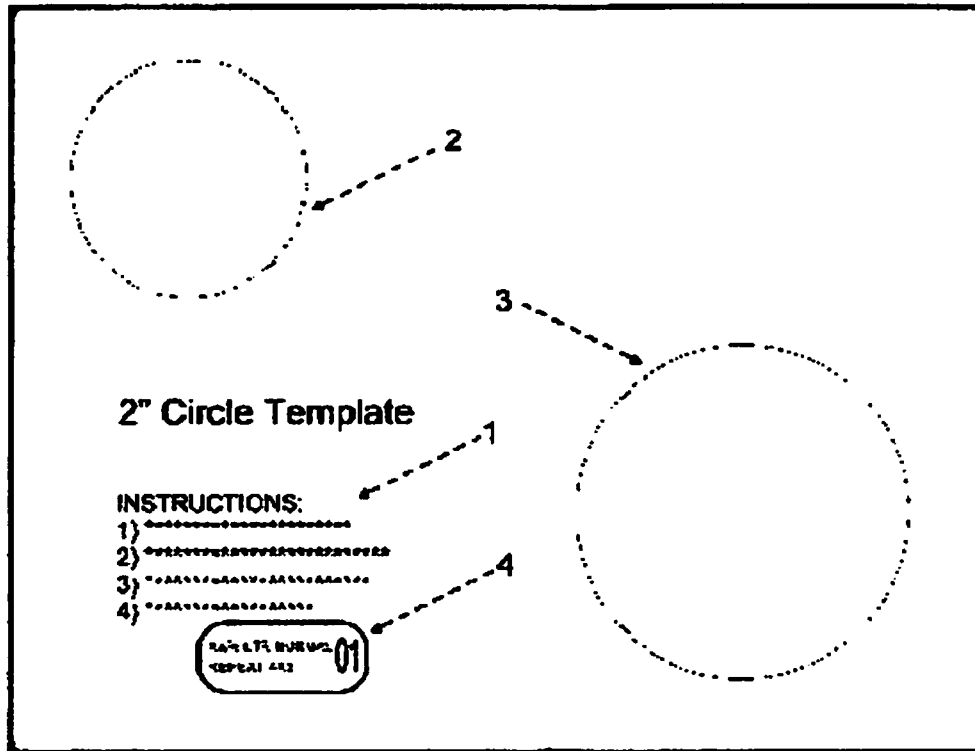


Figure 2

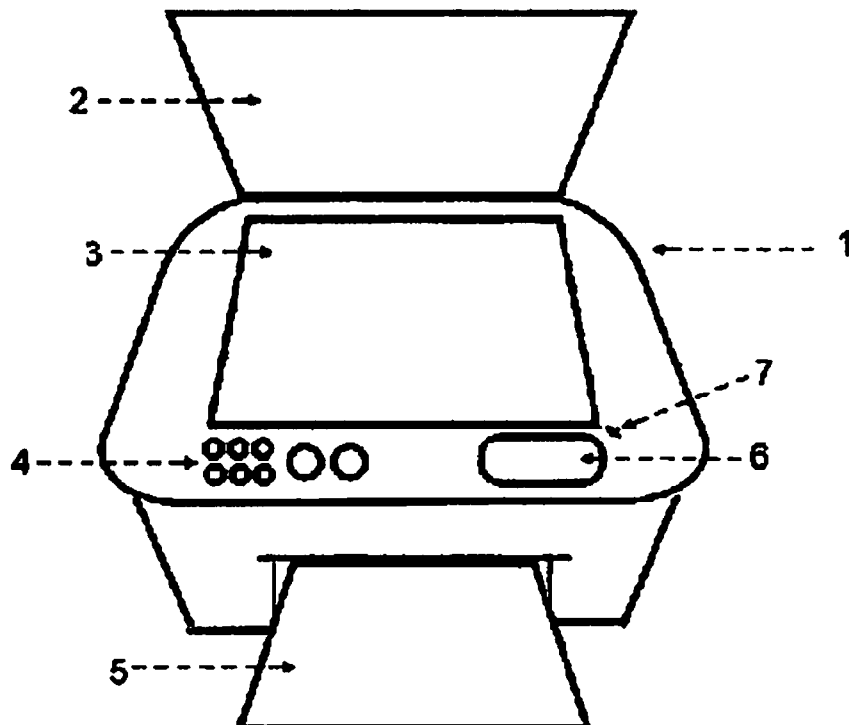


Figure 3

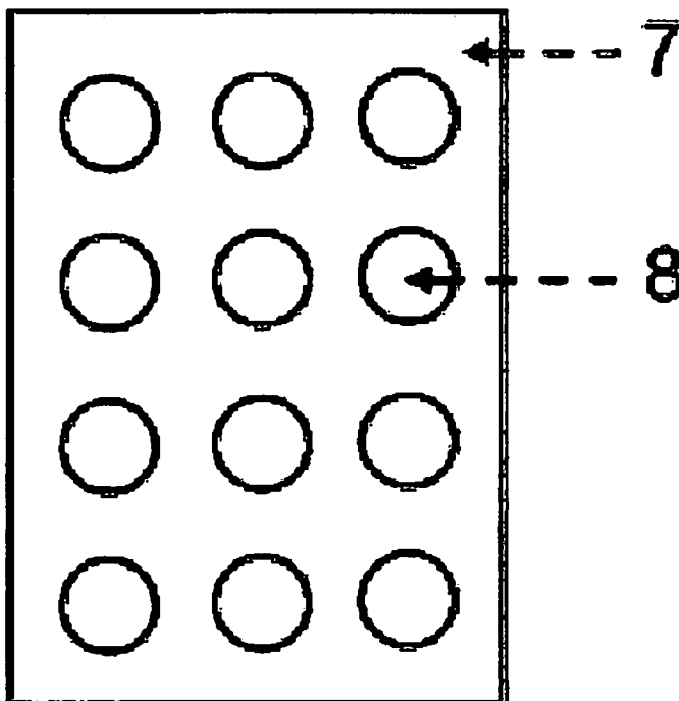


Figure 4

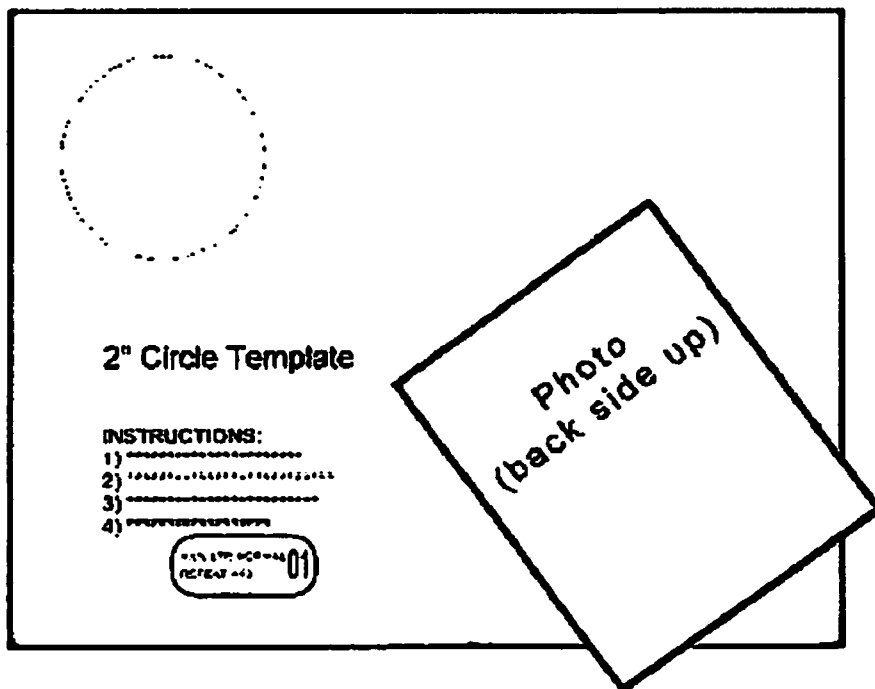


Figure 5

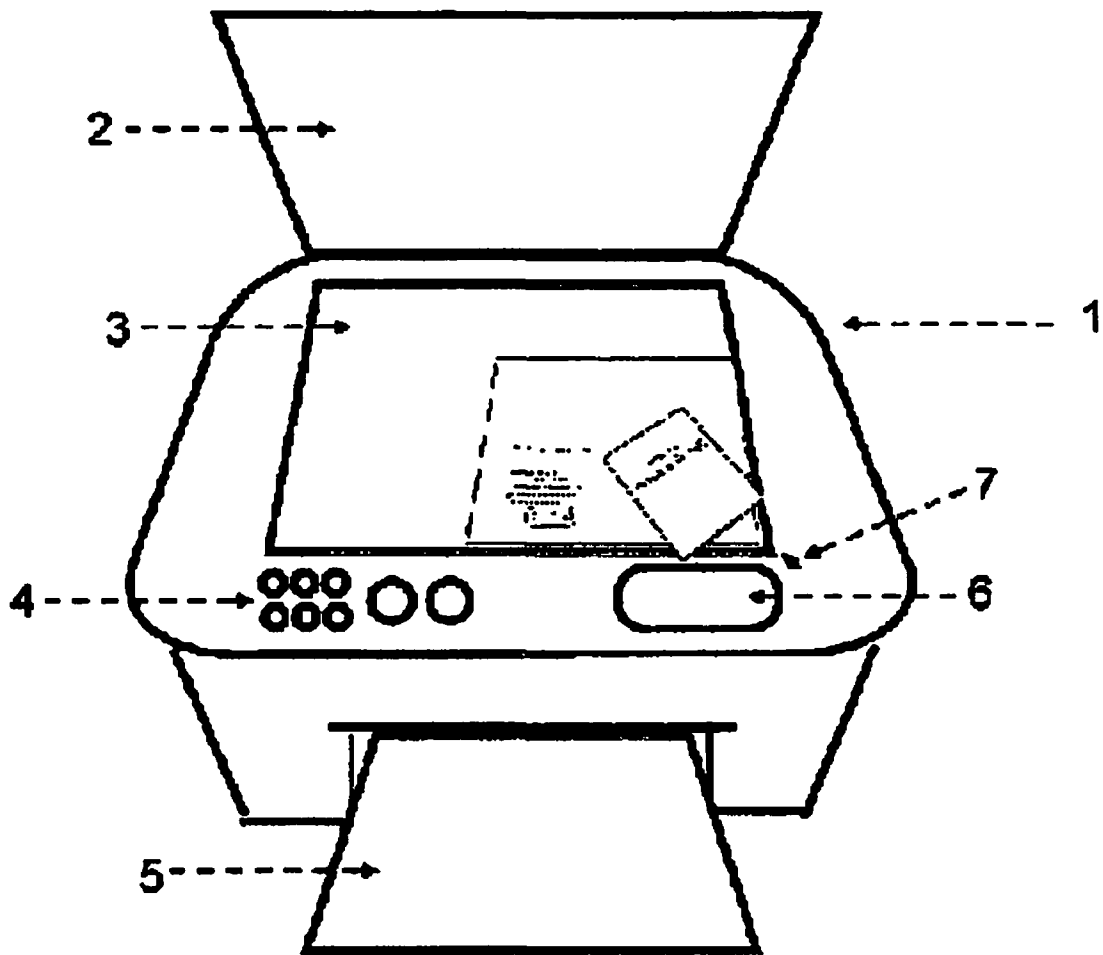
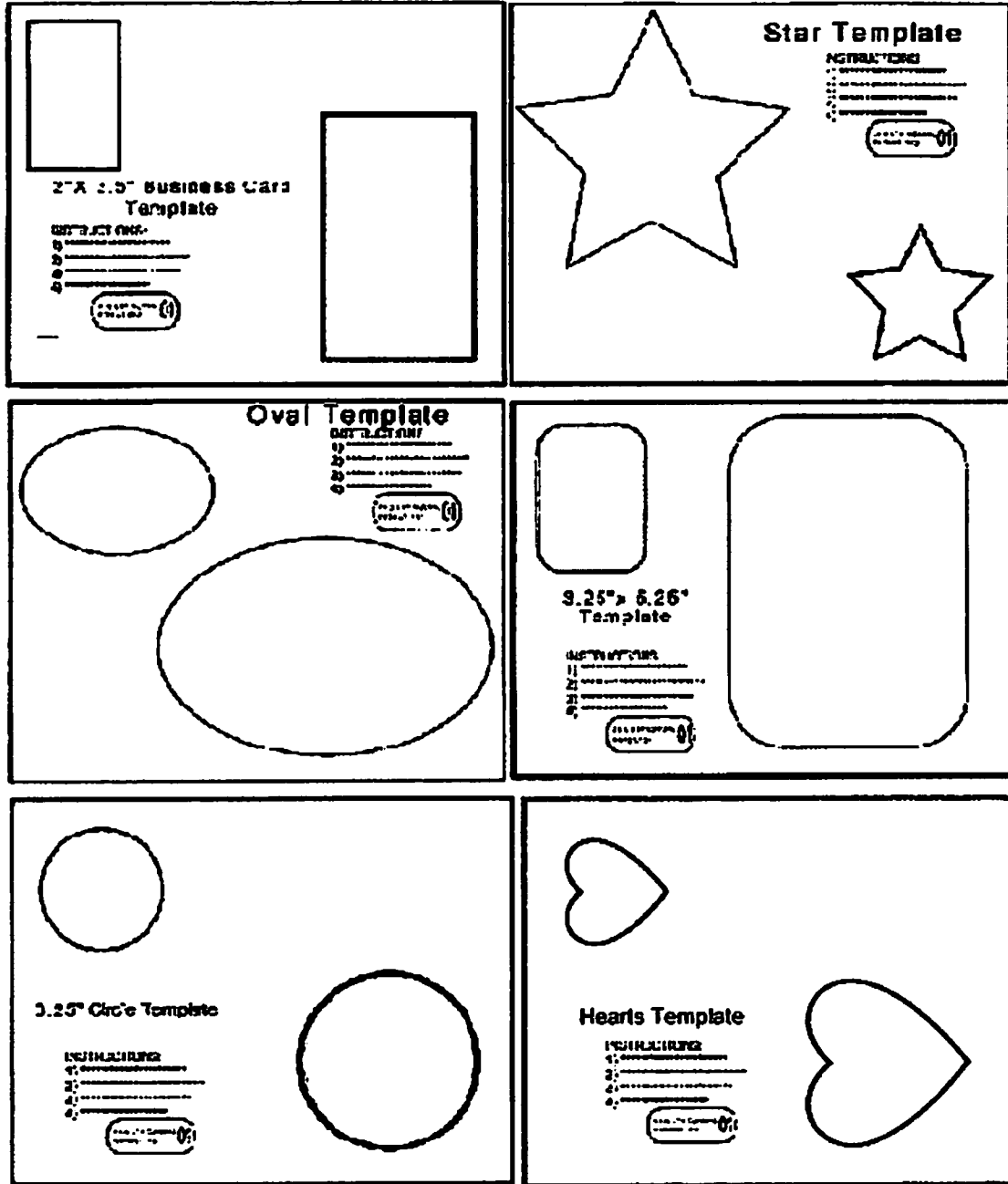


Figure 6



US 7,528,985 B2

1

**METHOD OF IMAGE CROPPING AND  
LOCATION AFFIXING FOR ENHANCED  
DUPLICATION REPRODUCTIONS ON  
EDIBLE MEDIA**

**CROSS REFERENCE TO RELATED  
APPLICATIONS**

This application is a Continuation of a previously filed  
Provisional Application having Ser. No. 60/576,456 filed Jun. 10  
3, 2004.

**STATEMENT REGARDING FED SPONSORED  
R & D**

(none)

**BACKGROUND OF THE INVENTION**

The inventive method will allow precision control of size, 20  
position and multiples in the reproduction of images onto  
pre-designed edible media shapes. The edible items or media  
can be made in a variety of pre-formed shapes or sizes thus  
eliminating the need for cutting either before or after the  
adornment is applied. Said edible media may then be readily  
applied to foodstuffs. 25

Previous to this method in order to achieve multiple repro-  
ductions of an image it was necessary to repeat the steps of a  
copying process or utilize a computer program with tile print-  
ing capability. Repetitive copying wasted considerable time  
and material while computer operation required specialized  
skills. The duplicated images would then need to be cut from  
the edible media by hand or by die cut.

By this method the user need only follow a prescribed set of  
instruction steps applying the photo or image over the tem-  
plate, placing both together on the glass platen and tile-copy-  
ing the cropped image directly onto pre-made Edible Media  
shapes.

Thus, with nominal prior training the user can quickly  
produce multiples and/or specialized shape image reproduc-  
tions on edible media, without the need of computer skill,  
ready to be applied to foodstuffs.

**SUMMARY OF INVENTION**

The invention utilizes specialized copying functions of  
multifunction inkjet scan/print/copy stations now commonly  
available for color photo reproduction. Certain models, for  
this example The Multipass MP700 by Canon, are compatible  
with edible inks and commonly available. 50

The edible media are previously known (reference patent  
application Ser. No. 11/019,997) and can be made in a variety  
of preformed shapes or sizes, multiple count per backing by  
virtue of manipulation of patterns during the making, thus  
eliminating a need for cutting either before or after the adorn-  
ment imagery is applied.

The instructions for using the template are as follows:

- 1) Select the masking template created for the desired  
output.
- 2) Line up the image to be reproduced with the cutout hole  
of the template, secure in place.
- 3) Place the template with attached image on the platen  
glass of a copier that uses edible ink.

2

4) Select output enlargement/reduction as indicated by  
instructions to determine the printed image size. These  
instruction settings are calculated based on the final  
pattern option desired and will differ with each pattern.  
Therefore the specific setting will be printed on the  
template surface. 5

5) Select Image Repeat settings as indicated by instructions  
to determine number of columns and number of rows.  
These instruction settings are calculated based on the  
final pattern option desired and will differ with each  
pattern. Therefore the specific settings will be printed on  
the template surface.

6) Insert corresponding style Edible Media in copier input  
feed tray.

7) Select "color copy" to activate machine copy process. 15

The Enlargement and Image Repeat option settings of the  
machine predetermine the area to be scanned for reproduc-  
tion. The cutout hole of the template is positioned precisely  
on the X and Y axis to take advantage of these programmed  
settings, thus enhancing control of the size, shape, quantity  
and position of the output images. By using the corresponding  
style pre-made edible media shapes the output image will be  
located precisely where the edible media shapes are formed  
on the backing carrier. 25

**ADVANTAGES**

**Economy:** The copy station utilized is less expensive than  
a computer system 30

**Efficiency:** Set up time is greatly reduced by using a copy  
station instead of the process of inputting settings in a com-  
puter program. This time saving can translate directly to  
greater throughput and productivity. 35

**Practicality:** The instructions for use are printed directly on  
each template in a "Button-by-Button" format thereby requir-  
ing minimal training or computer skill on the part of the user.  
Verification is done by visual matching of the Settings Screen  
with a printed representation on the template thereby further  
assuring success on the part of an unskilled user. 40

**Profitability:** With reduction in machine cost, reduction in  
time required and utilization by unskilled laborers the poten-  
tials for cost savings greatly enhances profitability. Also,  
larger quantity production may be addressed more practi-  
cally, thereby opening opportunities for new revenue venues  
at more competitive pricing. 45

**DISCUSSION OF THE PRIOR ART**

A method of using edible ink for decorating foodstuff is  
known, for example, U.S. Pat. No. 2,013,651 to Spergeon  
shows a decorating system for edible items wherein the image  
source is derived from a library of stored items by the way of  
a scanner and then passed on to a printer. The size of the  
printed image is selected, but not predetermined.

U.S. Pat. No. 6,147,743 to Fredlund illustrates a method  
and apparatus for providing zoom and crop functions in a  
photographic print and copying station. A scanner is used for  
scanning an image to print. A mask is placed over the image  
for copying and by selecting a desired copy size the masked  
area is recognized. The masked area is separated from the  
image area. The image area is resized to the selected copy size  
and the resized image is then printed. 60  
65



## US 7,528,985 B2

3

U.S. Pat. No. 4,910,661 to Barth et al teaches a method and apparatus for decorating cakes using a machine for applying flowable decorative material to cakes and other items. Live video images are displayed by a video camera on a monitor. The video image can be edited by text and other images. The displayed pattern or image is reproduced on the cake by using an X-Y table which is moving under liquid spray applicators.

U.S. Pat. No. 5,017,394 to Mac Pherson et al shows a method for making edible base pictorial images by using a silk screen that is first prepared with the desired image and is then silk screened onto foodstuffs, there is no mention of any sizing before or after the silk screening method.

U.S. Pat. No. 6,582,742 to Stewart teaches a method of photocopying an image onto an edible web sheet whereby an iced cake is decorated. The sheet is passed through a plain paper, color inkjet photocopy machine to reproduce the color image placed on the photocopy glass. Thereafter the image is scanned through the glass by passing the carrier and edible web along a non-tortuous path. The edible web is placed on an iced foodstuff. There is no mention of cropping or multiple image output.

## DESCRIPTION OF DIAGRAMS

FIG. 1 shows a face view of the template.

- 1-1: Instructions
- 1-2: 2.5" cutout
- 1-3: 3.5" cutout
- 1-4: image of copier screen, predetermined settings

FIG. 2 is a front perspective view of a typical image reproduction or copy station.

- 2-1: copier/reproduction device
- 2-2: cover
- 2-3: scan (platen) glass
- 2-4: control panel
- 2-5: output tray
- 2-6: copier screen
- 2-7: lead corner indicator

FIG. 3 shows an example of edible media output page with special shape and multiples of edible media.

- 3-7: output page or backing
- 3-8: edible media shapes

FIG. 4 showing the image or photo to be reproduced placed face down on the template with the desired area showing through the cutout.

FIG. 5 showing the template with image secured is positioned in the lead corner of the reproduction device scan glass platen.

- 5-1: copier/reproduction device
- 5-2: cover
- 5-3: scan (platen) glass
- 5-4: control panel
- 5-5: output tray
- 5-6: copier screen
- 5-7: lead corner indicator

FIG. 6 showing other examples of template configurations.

The invention claimed is:

1. A method of printing to edible media using a color reproducing device, comprising:

- placing a cropping tool at a predetermined location on a platen of the color reproducing device, the cropping tool defining a void;

4

placing an original image to be reproduced on top of the void to crop a portion of the original image; activating a reproducing feature of the color reproducing device;

receiving a reproduced image on the edible media, the reproduced image having a shape defined by a shape of the void; and

activating a multiple image feature of the color reproducing device to create multiple, reproduced images on each sheet of edible media.

2. The method of claim 1, further comprising creating multiple, reproduced images on separate sheets of edible media.

3. The method of claim 1, further comprising activating a magnification feature of the color reproducing device to create the reproduced image at the magnification level.

4. The method of 3, further comprising locating the void at specific coordinates on the platen in accordance with a magnification level of the reproduced image relative to the original image.

5. The method of claim 4, further comprising defining the void in accordance with a size of the original image.

6. The method of claim 1, further comprising selecting the cropping tool in accordance with a predetermined output shape and size of the reproduced image.

7. The method of claim 6, wherein the predetermined shape consists of a rectangle, a star, an oval, a circle, a rectangle having rounded corners, or a heart-shape.

8. The method of claim 1, further comprising applying the edible media to foodstuffs.

9. A method of printing an edible reproduction of an image using a color copier, comprising:

placing edible media in the color copier on which the edible reproduction of the image is to be printed;

placing a cropping tool at a predetermined location on a platen of the color copier, the cropping tool defining a void having a size determined in accordance with a magnification level of the edible reproduction of the image;

placing an original image to be reproduced on top of the void to crop a portion of the original image; and activating a control to print the edible reproduction of the image onto the edible media.

10. The method of claim 9, further comprising activating a multiple image feature of the color copier to create multiple, edible reproduction of the images on the same sheet of edible media.

11. The method of 9, further comprising locating the void at specific coordinates on the platen in accordance with the magnification level of the edible reproduction of the image relative to the original image.

12. The method of claim 11, further comprising defining the void in accordance with a size of the original image.

13. The method of claim 9, further comprising applying the edible media to foodstuffs.

14. A method of printing an image on edible media using a color ink-jet printer, comprising:

placing a cropping tool at a predetermined location on a platen of the color ink-jet printer, the cropping tool defining a void having a predetermined shape and size determined in accordance with a magnification level and shape of an image to be printed;

placing an original image to be reproduced on top of the void to crop a portion of the original image; and

US 7,528,985 B2

5

activating a control to print the image on onto the edible media, the image having a predetermined magnification level relative to the original image and a shape defined by the void.

15. The method of claim 14, further comprising activating a multiple image feature of the color ink-jet printer to create multiple images on the same sheet of edible media in accordance with a received selection.

16. The method of 14, further comprising locating the void at specific coordinates on the platen in accordance with the magnification level.

6

17. The method of claim 14, further comprising applying the edible media to foodstuffs.

18. The method of 17, further comprising determining the magnification level in accordance with a size of the foodstuffs to which the edible media is applied.

19. The method of claim 14, wherein the predetermined shape consists of a rectangle, a star, an oval, a circle, a rectangle having rounded corners, or a heart-shape.

\* \* \* \* \*

# **EXHIBIT B**

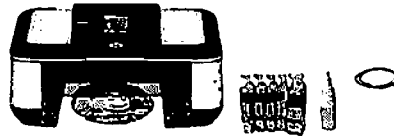
[Sign In](#)

**Edible Photos for Cakes**

## Imaging Systems

[Sign In](#) or [Create a New Account](#) to order this System

### Gold Label Stand-Alone System \$498



This system contains the following items:

- Canon MP560 or MP620 Scanner/Printer scans in 48-bit color prints to 9600 x 2400 dpi  
Prints up to 8.5" x 11" (8.5" x 14" with PC)
- Software package (for optional PC operation)
- USB Printer cable (request parallel on order form)
- 1 set of Gold Label edible ink cartridges
- Non-toxic Printhead Cleaner
- 2 packs of 25 8.5" x 11" icing sheets

Select one or more money-saving Add-Ons for this system:

#### Add-On Option A \$95

- Edible Ink Refill Kit (bottles)
  - Select two 24 packs of sheets:  
8.5"x11" sheets v 8.5"x11" sheets v
- Circles require matching Template (See Add-On below or Supply Kits)

#### Add-On Option B \$125

- Edible Ink Refill Kit (bottles)
  - 24 8.5" x 14" Icing Sheets
  - Select two 24 packs of sheets:  
8.5"x11" sheets v 8.5"x11" sheets v
- Circles require matching Template (See Add-On below or Supply Kits)

#### Add-On Option C \$38

- Only needed if not using a PC.  
Template and matching 24 pack of icing sheets  
Select template sheet size:  
2.5" circles v

All icing sheets packaged with our imaging systems (including Add-Ons) are Premium brand sheets. See the Icing Sheets page for exact print area dimensions for each size offered

[View other Imaging Systems](#)

[Sign In](#) or [Create a New Account](#) to order this System

Complete Kit for carrying out infringing method

Systems

Account

Info

Find us on Facebook

Phone: 1-540-869-5511 or 1-888-4-ICING-8 E-mail: [sales@icingimages.com](mailto:sales@icingimages.com)

EXHIBIT B