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FIRST LEGAL SUPPORT SERVICES

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
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ORIGINAL

GUTRIDE SAFIER LLP
ADAM J. GUTRIDE (State Bar No. 181446)
adam@gutridesafier.com
SETH A. SAFIER (State Bar No. 197427)
seth@gutridesafier.com
TODD KENNEDY (State Bar No. 250267)
todd@gutridesafier.com
835 Douglass Street
San Francisco, California 94114
Telephone: (415) 789-6390
Facsimile: (415) 449-6469

BOOKE & AJLOUNY LLP
VICTORIA L.H. BOOKE (State Bar No. 142518)
vbooke@gmail.com
PETER AJLOUNY (State Bar No. 192322)
peter@bookelaw.com
606 North First Street
San Jose, California 95112
Telephone: (408) 286-7000
Facsimile: (408) 286-7111

Attorneys for Plaintiff

E-filing

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DMR

INNOVATIVE AUTOMATION LLC,
Plaintiff,
v.
MICROTECH SYSTEMS, INC.,
Defendants.

Case No. **11 1299**

Complaint for Patent Infringement

Demand for Jury Trial

Date: March 17, 2011

1 Plaintiff Innovative Automation LLC states its complaint against Defendant
2 Microtech Systems, Inc. and alleges as follows:

3 **THE PARTIES**

4 1. Plaintiff Innovative Automation LLC (“Plaintiff” or “Innovative Automation”)
5 is a limited liability company organized and existing under the laws of the State of
6 California, with its principal place of business at 606 North First Street, San Jose, California
7 95112.

8 2. Upon information and belief, Defendant Microtech Systems, Inc. (“Microtech”
9 or “Defendant”) is a corporation organized and existing under the laws of the State of
10 California, with its principal place of business at 1164 Triton Drive, #100, Foster City,
11 California 94404.

12 **JURISDICTION AND VENUE**

13 3. This action is for patent infringement pursuant to the patent laws of the United
14 States, 35 U.S.C. §§ 1 *et seq.* This Court has subject matter jurisdiction over the action
15 pursuant to 28 U.S.C. §§ 1331 and 1338(a).

16 4. This Court has personal jurisdiction over Microtech because, on information
17 and belief, Microtech does and has done substantial business in this judicial District,
18 including (i) maintaining its principal place of business in this judicial District; (ii)
19 committing acts of patent infringement and/or contributing to or inducing acts of patent
20 infringement by others in this judicial District and elsewhere in California; and (iii) regularly
21 doing business or soliciting business, engaging in other persistent courses of conduct, and/or
22 deriving substantial revenue from products provided to persons in this District and in this
23 State.

24 5. Venue is proper in this judicial District pursuant to 28 U.S.C. §§ 1391 and
25 1400(b) because Microtech resides in this judicial District, and because a substantial part of
26 the events giving rise to the claims occurred in this judicial District.
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1 **CLAIM FOR RELIEF**

2 **(Infringement of United States Patent No. 7,174,362)**

3 6. Plaintiff realleges and incorporates by reference paragraphs the above
4 paragraphs of this Complaint, inclusive, as though fully set forth herein.

5 7. Plaintiff is the owner of all right, title, and interest in United States Patent No.
6 7,174,362, entitled "Method and System for Supplying Products from Pre-Stored Digital
7 Data in Response to Demands Transmitted via Computer Network," duly and legally issued
8 by the United States Patent and Trademark Office on February 6, 2007 (the "'362 patent").
9 A true and correct copy of the '362 patent is attached hereto as Exhibit A.

10 8. The '362 patent generally describes and claims a computer-implemented
11 method of digital data duplication. In the method of claim 1 of the '362 patent, a request is
12 taken at one or more user interfaces and is transmitted through a network to a computer. The
13 computer contains a module to create a task log based on incoming requests; a module for
14 storing the necessary data; and a module to create a subset of the data, download that subset
15 to an output device, and command the device to transfer the subset onto blank media. The
16 request is assigned to an output device, and the duplication process is executed. Claims 2-8
17 of the '362 patent describe various other methods and a system of digital data duplication.

18 9. Microtech has infringed and continues to infringe, literally and/or under the
19 doctrine of equivalents, one or more claims of the '362 patent under 35 U.S.C. § 271 by
20 making, offering to sell, and selling infringing media duplication devices. For example,
21 Microtech's Xpress XL device takes requests at a user interface and transmits them through
22 a network to a computer. (*See, e.g.*, Exs. B and C.) The computer contains a module to
23 create a task log based on incoming requests; a module for storing the necessary data; and a
24 module to create a subset of the data, download that subset to an output device, and
25 command the device to transfer the subset of data onto blank media. (*See, e.g., id.*) The
26 Microtech Xpress XL assigns the requests to output devices, and the duplication process is
27 executed. (*See, e.g., id.*) Microtech's products that operate in this way infringe, without
28 limitation, claim 1 of the '362 patent under 35 U.S.C. § 271.

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10. On information and belief, Microtech has knowledge that its infringing products, including without limitation the Microtech Xpress XL, are especially made or especially adapted for use in a manner that infringes the '362 patent. For example, Microtech's infringing products are made or adapted to be connected to a network to perform the method of digital data duplication claimed in the '362 patent. Microtech's infringing products are not staple articles or commodities of commerce suitable for substantial noninfringing use.

11. As a result of Microtech's infringing activities, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Microtech's infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs.

12. Plaintiff reserves the right to allege, after discovery, that Microtech's infringement is willful and deliberate, entitling it to increased damages under 35 U.S.C. § 284, and to attorneys' fees incurred in prosecuting this action under 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests entry of judgment in its favor against Microtech as follows:

- a) For a declaration that Microtech has infringed, directly and/or indirectly, the '362 patent;
- b) For an award of damages adequate to compensate Plaintiff for Microtech's infringement of the '362 patent, but in no event less than a reasonable royalty, together with prejudgment and post-judgment interest and costs, in an amount according to proof;
- c) For an entry of a permanent injunction enjoining Microtech, and its respective officers, agents, employees, and those acting in privity with them, from further infringement, including contributory infringement and/or inducing infringement, of the '362 patent, or in the alternative, awarding a royalty for post-judgment infringement;

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d) For an award of attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise permitted by law; and

e) For an award to Plaintiff of such other costs and further relief as the Court may deem just and proper.

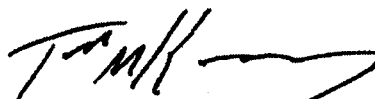
DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury.

Respectfully submitted,

Dated: March 17, 2011

GUTRIDE SAFIER LLP



Adam J. Gutride, Esq.
Seth A. Safier, Esq.
Todd Kennedy, Esq.
835 Douglass Street
San Francisco, California 94114
Telephone: (415) 789-6390
Facsimile: (415) 449-6469

Victoria L.H. Boone
Peter Ajlouny
BOOKE & AJLOUNY LLP
606 North First Street
San Jose, California 95112
Telephone: (408) 286-7000
Facsimile: (408) 286-7111

Attorneys for Plaintiff Innovative
Automation LLC

Exhibit A



US007174362B1

(12) **United States Patent**
Lee

(10) **Patent No.:** US 7,174,362 B1
 (45) **Date of Patent:** Feb. 6, 2007

(54) **METHOD AND SYSTEM FOR SUPPLYING PRODUCTS FROM PRE-STORED DIGITAL DATA IN RESPONSE TO DEMANDS TRANSMITTED VIA COMPUTER NETWORK**

Primary Examiner—Moustafa M. Meky
 (74) *Attorney, Agent, or Firm*—Jeffrey Sonnabend; SonnabendLaw

(57) **ABSTRACT**

The present invention relates to a digital data duplication system that utilizes one or more computer networks to automate the process from order-taking to delivery, eliminating the need for human supervision. Customers enter requests for a given number of machine-readable articles containing digital data, typically compact disks. The requests are transferred to a website, which sends to a server electronic mails containing the details of the requests. Upon receiving an electronic mail, the server directs a printing device to produce mailing labels for shipment. The server has an internal archive of all data it uses to convert blank CD-Rs into the requested CDs, and is connected to a series of CD-R writing machines. The server schedules each request, downloads necessary data onto the CD-R writing machine that is assigned a particular request, and sends a write command. The CD-R writing machine subsequently transfers the data in its cache onto the pre-loaded CD-Rs. After the data transfer is complete, the CDs embodying the requested information are automatically placed in a bin for shipment.

(76) **Inventor:** Sungll Lee, 3219 Cantada Ct., San Jose, CA (US) 95112
 (*) **Notice:** Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 1447 days.

(21) **Appl. No.:** 09/718,286

(22) **Filed:** Nov. 21, 2000

(51) **Int. Cl.**
G06F 13/00 (2006.01)

(52) **U.S. Cl.** 709/203; 709/217; 709/219

(58) **Field of Classification Search** 709/203, 709/217, 218, 219, 226, 227; 369/84, 85
 See application file for complete search history.

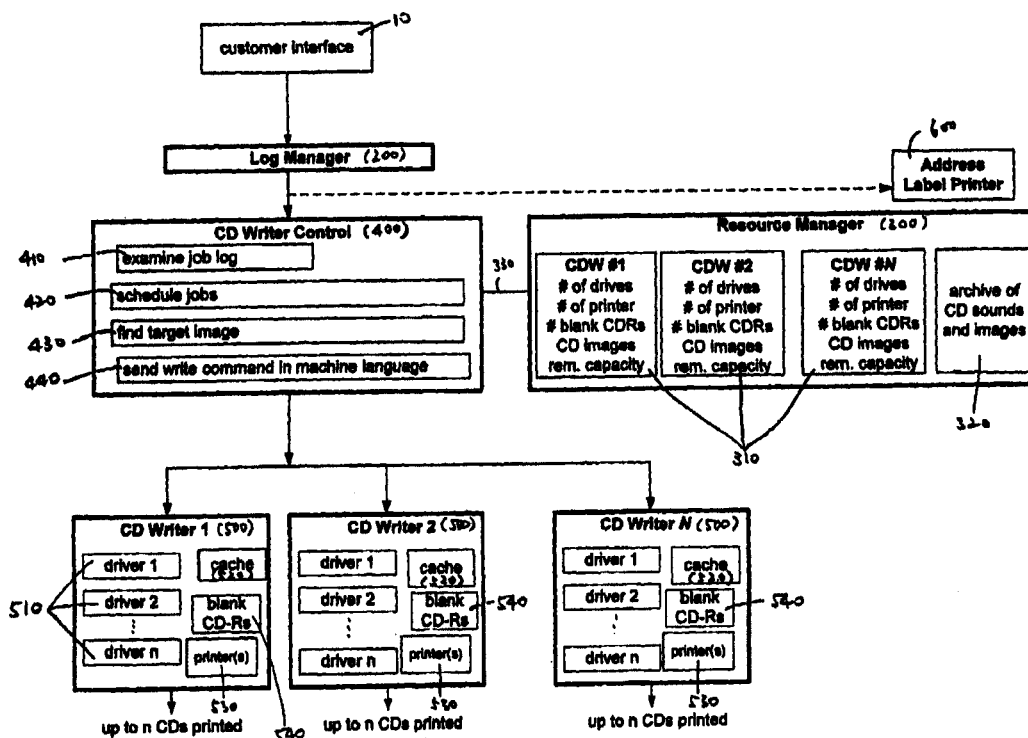
(56) **References Cited**

U.S. PATENT DOCUMENTS

- 6,141,298 A * 10/2000 Miller 369/30.33
- 6,208,612 B1 * 3/2001 Miller 369/30.19
- 6,499,106 B1 * 12/2002 Yaegashi et al. 713/193
- 2002/0046215 A1 * 4/2002 Petrocelli 707/200

* cited by examiner

8 Claims, 4 Drawing Sheets



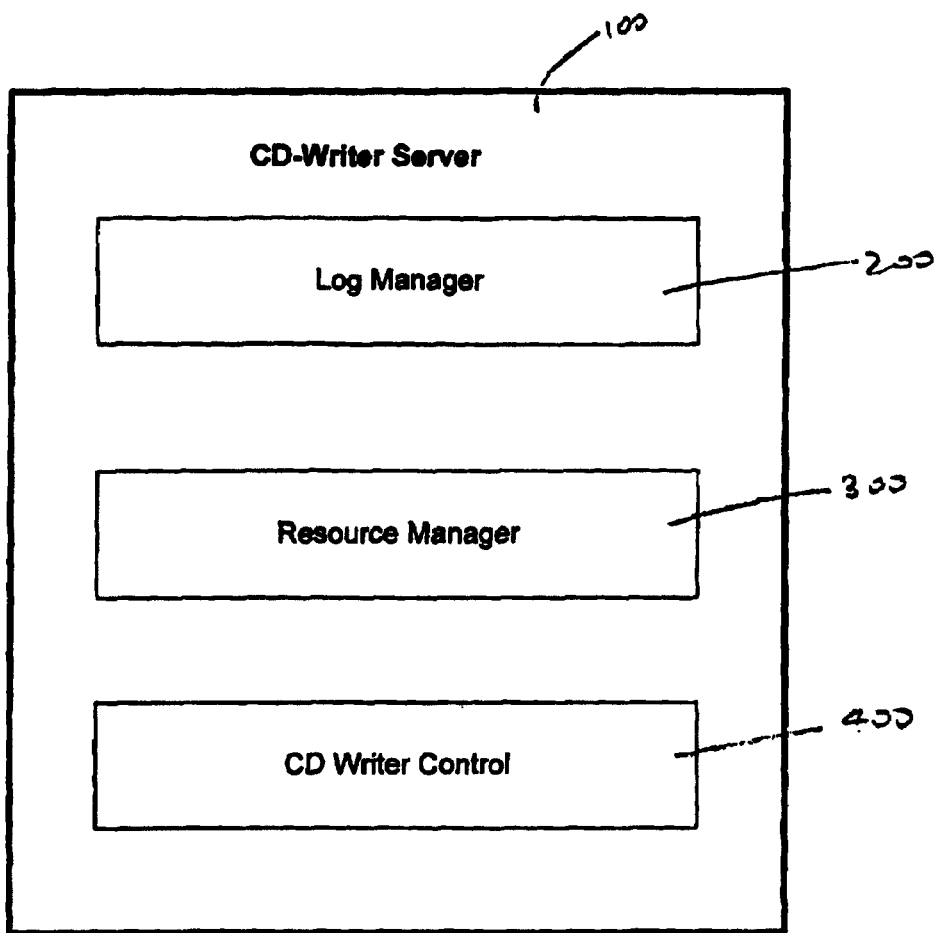


FIG. 1

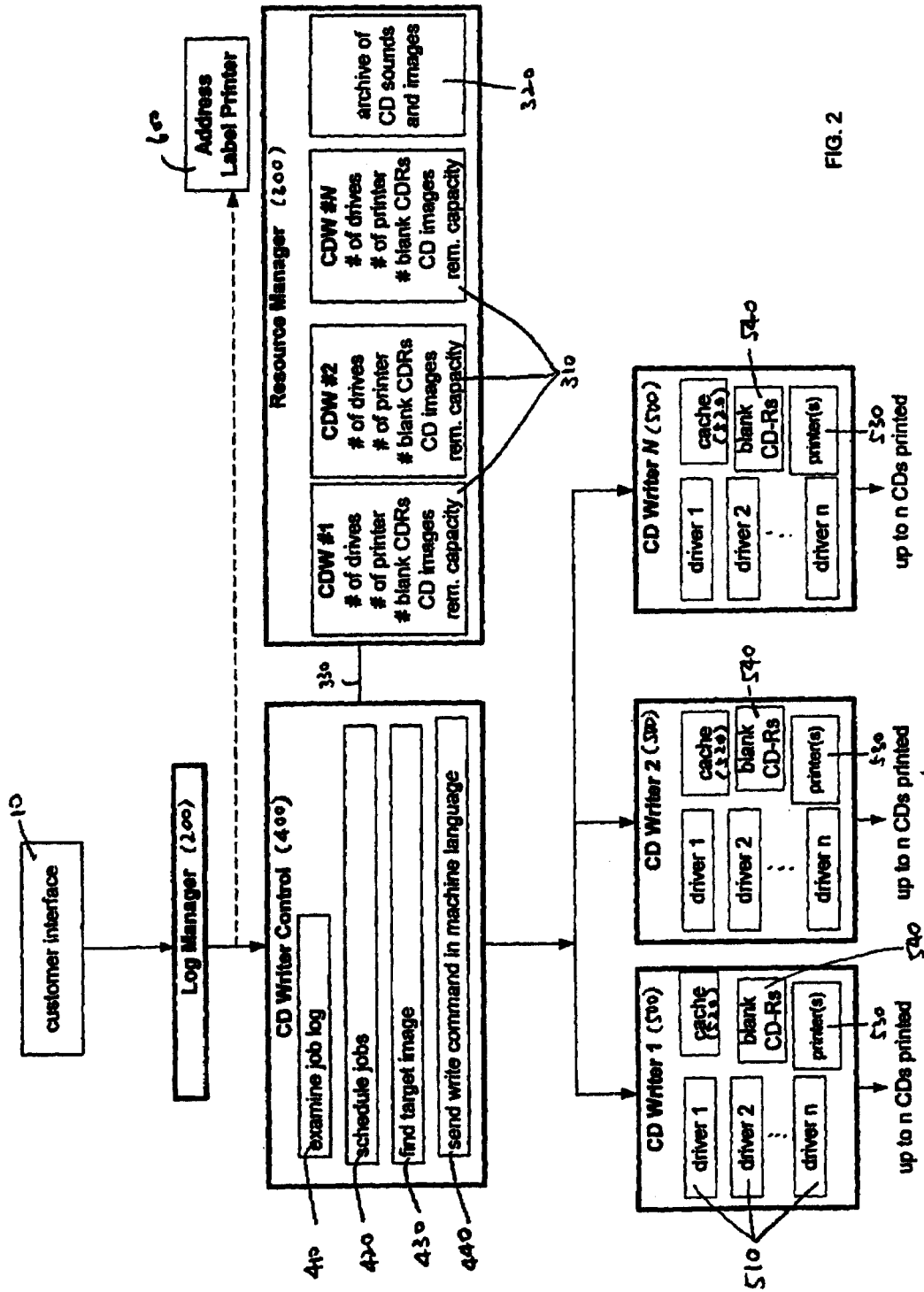


FIG. 2

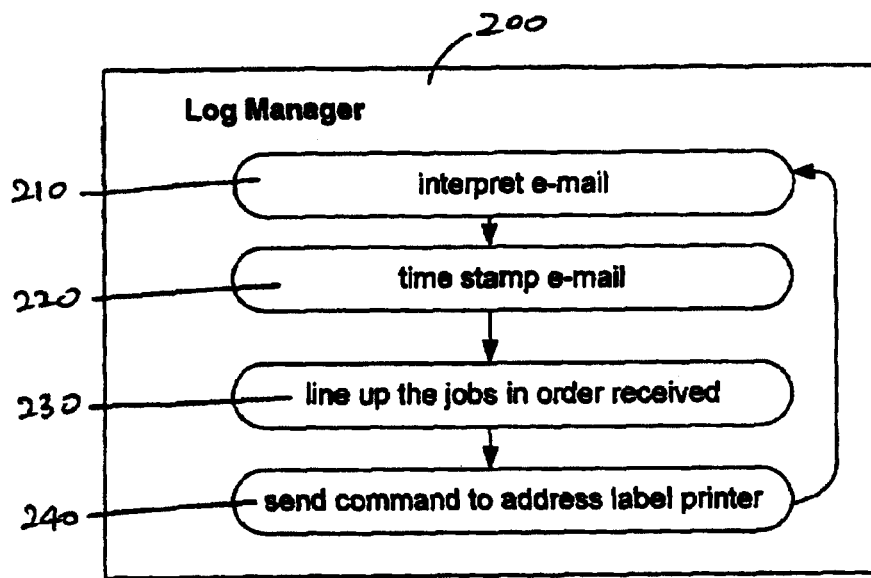


FIG. 3

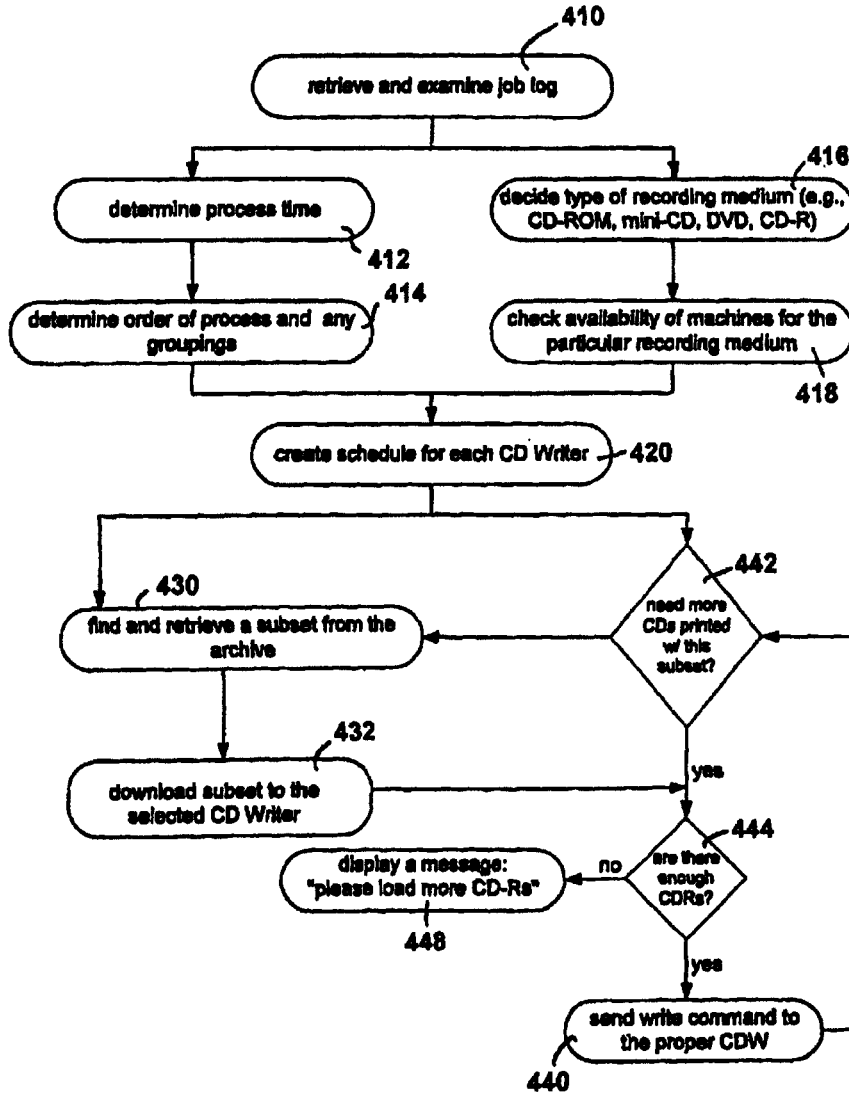


FIG. 4

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**METHOD AND SYSTEM FOR SUPPLYING
PRODUCTS FROM PRE-STORED DIGITAL
DATA IN RESPONSE TO DEMANDS
TRANSMITTED VIA COMPUTER
NETWORK**

BACKGROUND OF THE INVENTION

1. Technical Field

The present invention relates to a digital data duplication system that utilizes one or more computer networks to automate the process from order-taking to product delivery. More specifically, the invention permits users of CD duplication services to directly place requests into a server, which then schedules production, allocates resources, executes duplication, and sorts the products for shipment.

2. Description of Related Art

Before the advent of recordable digital compact disks (hereinafter "CD-Rs"), the transfer of data onto compact digital disks was a costly procedure, economically feasible only when manufacturing a large number of copies. Users whose applications required relatively few copies or required frequent data updates could not reap the benefits of this compact disk duplication technology, even though low-cost disk-readers were readily available.

The advent of CD-R was intended to allow users to record their own disks and thereby achieve significant savings. Unlike a common compact disk that has been pressed by a mold, a CD-R typically has a dye layer that is etched by a laser contained in the CD-R disk drive. Once etched, the "burned" CD-R disk is unalterable.

Several practical problems have prevented CD-R users from attaining maximal efficiency in the copy process, especially when attempting to make multiple disk copies in a short amount of time. One of the problems that typically arise in a volume copying process using CD-R writers is the necessity for direct human supervision. A person has to prepare CD-R disks for copying, remove the disks from the CD-R writer once copying is complete, and then prepare the disks for inspection to ensure no defective CD-R disks are retained in the completed set of copies. Aside from the tedium involved that may increase errors, requiring human attention in this process adds a significant labor cost that is added to the end-user price.

One solution to the human supervision problem is a programmable, automatic compact disc duplication system. That system, which includes a copy unit, a host computer and a computer software that provides a user interface, is further discussed in U.S. Pat. No. 6,141,298, incorporated herein by reference. While the system in the above patent eliminates some of the manual steps that creates inefficiency, it still leaves many steps to be handled by operators.

SUMMARY

The present invention relates to a method and system of taking customer requests and writing the requested digital data onto various digital recording media, such as CD-ROMs, CDs, mini-CDs, or DVDs. Using this method, a customer can request any quantity of a specific CD, mini-CD, or DVD through an electronic commerce transaction system or a website and have a server automatically process the request so that it is ready for delivery. Upon order entry, the customer interface website first sends an electronic mail (e-mail) to a CD Writer Server. The e-mail triggers the CD Writer Server to update a log of requests and send signals to one or more printing devices that prepare address labels for

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delivery. Once the log is updated, the CD Writer Server schedules the requests based on estimated process time, availability of the appropriate output device, suitability of particular devices for handling a particular request, among other characteristics. Information on process time is obtained from an internal archive of the digital data used to produce the ordered CDs. Likewise, the information concerning the availability of each output device in the system is found in internal resource files. When scheduling is complete, the CD Writer Server converts the e-mail requests into machine language and sends write commands to designated output devices.

One important object of the present invention is to cost-effectively duplicate CDs using CD writers in response to requests received from remote customers. The present invention removes the inefficiency associated with human supervision, and eliminates the need for inventory.

BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 is a schematic depiction of the three modules comprising a CD Writer Server.

FIG. 2 is a block diagram depicting the process flow from order receipt to production.

FIG. 3 is a schematic depiction of the functions of the Log Manager.

FIG. 4 is a schematic depiction of the functions of CD Writer Control.

DETAILED DESCRIPTION

The present method and system relate to conducting a business that supplies any type of written or printed material, such as invitations, books, cards, and similar materials that can be mechanically produced from an archive of digital information. In one embodiment, the present invention is adapted to produce various digital recording media, such as CD-ROMs, CDs, mini-CDs, and DVDs (hereinafter collectively referred to as CDs). The invention is implemented through a computer system herein referred to as CD Writer Server. CD Writer Server 100 processes customer requests by using three modules that work together: Log Manager 200, Resource Manager 300, and CD Writer Control 400 (see FIG. 1). A "module," as used herein, refers to the functionality and not the configuration of components.

The CD Writer Server 100 typically resides on an e-mail server because the CD Writer Server commonly communicates with the customer interface 10 via e-mails. The order fulfillment process is triggered when a customer enters a request through a customer interface 10. A customer interface includes but is not limited to a website, a web server, an electronic commerce transaction system, a customized start page, or an e-mail subsystem. At the interface, the customer is prompted to provide 1) the content(s) he wants duplicated, for example identifiers of songs, movies, or software, 2) the desired quantity, 3) personal information such as the name, address, and phone number of the customer, 4) the desired shipping method, 5) the due date, and 6) a payment or a method of payment, such as a credit card number, among other information. After the request has been entered and the CD Writer Server 100 has scheduled the request, the customer may be able to see an estimated delivery date at the interface 10.

The present system manages payment at the customer interface 10, either through an e-commerce transaction system involving a credit card number, or through an account number to which charges can be made. Managing payment

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through an e-commerce system significantly reduces the amount of human supervision that is required.

As shown in FIG. 2, the CD Writer Server 100 module that first receives an e-mail order from the customer interface is Log Manager 200. FIG. 3 shows that upon receiving an e-mail, Log Manager 200 first interprets it 210 and extracts certain information, including but not limited to the mailing address. Then, Log Manager 200 time-stamps each incoming e-mail 220 and lines it up in the order of receipt 230, creating a log that CD Writer Control 400 can eventually retrieve and process. In addition, Log Manager 200 sends the extracted mailing address information 240 to an address label printer 600. The printer 600 is optionally attached to the CD Writer Server 100. Log Manager 200 repeats 250 the process with each incoming e-mail request, updating the log with each request.

After Log Manager updates the log, CD Writer Control 400 retrieves the log and examines it 410 in conjunction with the information stored in Resource Manager to schedule the production of CDs. The information CD Writer Control retrieves from Log Manager 200 pertains to the specifics of a request, such as the order quantity and the requested content. In contrast, the information stored in Resource Manager 300 pertains to hardware configuration and digital data that represent contents that can be transferred to a blank medium. As FIG. 2 shows, Resource Manager maintains two types of files: a set of resource files 310, one file for each of the output devices controlled by CD Writer Server, and an archive 320 of all the sounds, images, and characters used to execute the duplication requests.

In one embodiment, there are as many resource files 310 in Resource Manager 300 as there are output devices (hereinafter CD Writers) 500. For example, Resource Manager 300 shown in FIG. 2 stores N resource files 310 because there are N CD Writers 500. Each resource file contains the name and the IP address of each CD Writer 500, the number of drives and printers in each of those machines, and the number of blank CD-Rs remaining in each machine, among other information. Moreover, the resource file 310 keeps track of which data from its archive 320 has been copied to the internal cache 520 of each CD Writer 500 and how much cache space remains in each machine. The latter information becomes important when some data needs to be purged in order to download new data. As FIG. 2 shows, Resource Manager 300 and CD Writer Control 400 maintain close communication 330 so that every time CD Writer Control 400 sends a write command 440 to one of the CD Writers 500, Resource Manager 300 can update the resource file 310 for that CD Writer.

As mentioned above, Resource Manager 300 also stores an archive 320 of all the sounds, images, and characters used to produce the requested CDs. The archive can be internally indexed by part numbers, each part number being associated with a path name. In one, the hard drive of Resource Manager 300 was designed to hold at least 1,000 CD contents along with corresponding graphics, which are to be physically printed on the CDs (the number of contents the archive can hold depends on the amount of data that each content corresponds to). In order to change or update the contents of the archive, an operator would have to delete some of the existing data and download new data from a network or a digital storage medium.

CD Writer Control 400 retrieves information from both Log Manager 200 and Resource Manager 300 to schedule production for each CD Writer 500 connected to the system. In order to optimize production, CD Writer Control 400 must first calculate the process time for each order 412. This

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calculation is performed by first reading the title of the requested songs or movies from the order log and looking up the size of those songs or movies in the Resource Manager archive. Then, CD Writer Control 400 can schedule the requests according to whatever criteria that best suits the business (i.e., it can be programmed). For example, it can schedule the duplication jobs in the order that the requests were received, to ensure that between two requests with approximately equal process times, the request that was received first will be processed first. Alternatively, it can prioritize the request with a closer due date or an order marked "high priority." Furthermore, if there are multiple orders requesting the same content, CD Writer Control 400 can group those orders so that they can be produced together 414 (but the mailing address labels would be different for each order). Other factors may only be taken into account in the scheduling algorithm.

Since there are different types of CD Writers 500 (for example, CD Writers for DVDs and CD Writers for mini-CDs) with different cache 520 contents and varying numbers of drives 510, scheduling involves careful selection of a CD Writer for each job. CD Writer Control 400 selects (416, 418) a CD Writer 500 based on the hardware configuration data stored in Resource Manager's resource files 310. CD Writer Control 400 would send a job to the next available CD Writer 500 of the appropriate type that already has the requested content in its cache 520. For optimal production, as many machines as possible would be processing orders concurrently.

Once scheduling is complete, CD Writer Control tells the designated CD Writer to begin the duplication process by sending a "write" command in the appropriate machine language 440. However, before sending the "write" command, CD Writer Control 400 must check to make sure there are enough blank CD-Rs 540 loaded in the particular machine, as shown in FIG. 4. CD-R, as used herein, refers to any kind of medium onto which data can be fixed, printed, embodied, or stored, and from which the information fixed, printed, embodied, or stored therein can be perceived, reproduced, used, or otherwise communicated, either directly or indirectly with the aid of a device. Each CD Writer can be designed to hold as many number of CD-Rs as is practical. If there is an insufficient number of blank CD-Rs remaining, CD Writer Control notifies the operator with a short message 448. If there are enough blank CD-Rs, CD Writer Control will send the write command for the proper number of CDs 440. Note that the maximum number of CDs that can be written and printed with one "write" command is equal to the number of drives in the CD Writer that is processing the order (shown as n in FIG. 4). Thus, CD Writer Control repeatedly sends 446 a "write" command to the designated machine until the requested number of CDs have been produced. When a request is fulfilled, CD Writer Control 400 proceeds to the next request scheduled for the particular CD Writer.

In the event that no CD Writer of the appropriate type contains the requested data in its cache, CD Writer Control must check whether there is enough cache space left in the machine and download 432 the necessary data onto that machine from the Resource Manager internal archive. Only after downloading is complete can the CD Writer Control send its "write" command, which directs the CD Writers to transfer a specific subset of data from their cache to the blank CD-Rs. In one embodiment, each CD Writer is designed to hold up to about 200 CD images and printer graphics (depending on the size of the images).

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Writing a CD entails not only transferring digital data from the cache 520 to the blank CD-Rs 540, but also printing certain graphics on the surface of the mediums. Thus, each CD Writer must be equipped with at least one printing device 530.

While the present invention is illustrated with particular embodiments, it is not intended that the scope of the invention be limited to the specific and preferred embodiments illustrated and described.

I claim:

1. A computer-implemented method of digital data duplication comprising:

taking requests at one or more user interfaces;
transmitting said requests through a network to a computer;

assigning each of said requests to one of a plurality of output devices; and

executing the duplication process,
wherein said computer comprises:

at least one first module configured to create a task log based on incoming requests;

at least one second module configured to store all data necessary for executing said duplication process;

at least one third module configured to create a subset of said data stored in said second module, further configured to download said subset to one of said output devices, and further configured to command said output device to transfer said subset onto blank media; and
a connection through which said second module communicates with said first module and said third module.

2. The method of claim 1, wherein said data stored in said second module comprises:

an expandable indexed archive of digital data, said data representing contents available for request by customers; and

at least one resource file for each of said output devices in communication with said computer.

3. The method of claim 2, wherein said data in each said resource file comprise:

name and type of said output devices;
network address of said output device;
number of drives in said output device;
availability of said output device;
number of blank recording mediums pre-loaded in said output device;

index of digital data that has been downloaded onto said output device; and

hard drive capacity remaining in said output device.

4. The method of claim 1, wherein said first module is configured to send at least one signal to at least one printing device to create mailing address labels for each of said requests.

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5. The method of claim 1, wherein assigning said requests comprises:

grouping together requests for the same content;

directing said requests to the most immediately available output device that is capable of making the requested duplication onto the requested type of recording medium;

tracking the number of recording mediums remaining in each output device;

notifying an operator if more recording mediums need to be loaded;

finding the digital data that corresponds to the requested content;

sending a write command to said output device in the format that said output device understands;

waiting for the output device to perform the requested number of duplications;

repeating the above steps each time a new request is entered.

6. The method of claim 5, wherein finding the digital data comprises:

checking the cache of said output devices for data representing the requested content(s);

deleting enough pre-existing data in said cache to make room for said requested content; and

downloading said requested content from said computer onto said cache of said output device.

7. The method of claim 1, wherein each module that comprises said computer is responsive to electronic mail commands.

8. A system for duplication of data onto digital recording mediums, the system comprising:

a customer interface; and

a communication network connecting said customer interface to a server that schedules and process duplication;
wherein said server comprises:

first module for creating a log of customer requests;
second module for storing the data to be duplicated;
third module for scheduling the duplication of each request and directing each request to one of a plurality of output devices;

at least one printing device for producing mailing labels for each request; and

at least one output device for transferring the data requested by customers from an internal data storage onto digital recording mediums.

* * * * *

Exhibit B

MICROTECH

Xpress

Xpress XP is designed for high volume continuous CD and DVD publishing.

Pump Up the

XPRESS XL SYSTEM FEATURES

- 800 Disc Capacity
- 12 CD or DVD Recorders
- Formats supported: CD-R, DVD-R, DVD+R, DVD-DL, DVD+DL
- Concurrent Mixed Media Support
- 2 High-Quality Inkjet or Thermal Printers
- Customizable API
- High Throughput
- Fast Robotics
- Modular Design
- Integrated Windows PC

HIGH CAPACITY MIXED MEDIA CD/DVD/DVD-DL Production System

Microtech's Xpress XL system is designed for production environments where flexibility and throughput are paramount. Dual printers may be configured as the same type for highest throughput or as different types for simultaneous printing of inkjet and thermal discs. Twelve recorders operate independently for highest production speed regardless if all discs are the same (duplication) or each disc is unique (publishing).

FULLY LOADED

Each Xpress XL unit includes a 800-disc capacity robotic handler and integrated server PC for maximum throughput in a networked environment. Xpress XL is a scalable solution, using Microtech publishing software, or creating your own application with the API. A typical installation has one or multiple Xpress XL units duplicating from your network in unison.



SYSTEM

DVD Combo Recorders	12
Disc capacity	800 (Unattended)
Throughput	Varies by media format
Handling	Removable Spindles
Integrated PC	Windows XP Operating System
Network	100/1000 Base T Ethernet
Dimensions	28.4"W x 26.4"D x 34.7"H
Elec. Requirements	6A @ 120 Volts 3A @ 220 Volts
Disc printers	(2) Inkjet or Thermal or combination
Monitor	17" Flat Panel LCD
Software	ImageMaker EZ, DiscPrint, MyDisc Standalone
Mixed Media Support	Included

HARDWARE & SOFTWARE

ImageAligner?	Optional
Card CD module	Optional
Software	MyDisc Enterprise Rockridge Premastering

IMAGE MAKER SOFTWARE SUITE

All software comes fully installed and ready to run. Work directly from an Xpress system or over a network to create professional image and layout files, and schedule and control jobs to suit your production environment.

In order to meet with today's security standards, our publishing software enables you to copy-protect your discs as well as encrypt them with dynamically generated serial numbers. Use our API to integrate with your unique automated processes or discuss your customization needs with us.

DISC PRINTING

K2 thermal printer uses the latest retransfer technology for superior photo quality and full disc coverage. The results are comparable to off-set printing.

PR13 thermal printer is ideal for printing text or graphics on blank or pre-silk screened discs in either black or single color.

XpressJet II inkjet printer, developed in partnership with Hewlett Packard provides professional print quality (4800 dpi).

WARRANTY, SERVICE AND TECHNICAL SUPPORT

All Xpress hardware is warranted for one year. Unaltered, defective hardware will be repaired or replaced. Our help desk has instant access to the complete history of your particular Microtech system and support needs. Contact Microtech Sales for more information about on-site service, installation, training, replacement and extended warranties.

TELEPHONE	650-596-1900
TOLL FREE	800-223-3693
INTERNATIONAL	+01-650-596-1900

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Exhibit C

MICROTECH

ImageMaker 5.x

ImageMaker Software is a full suite of programs designed for use with a Microtech CD/DVD and Blu-ray production system

Create Manage

IMAGEMAKER 5.x SUITE

- MyDisc 5.x
- DiscPrint 5.x
- Media Remote
- Utilities
- Integration Methods
- API'S

Microtech's proprietary *ImageMaker Software 5.x Suite* is simply the best on the market. We have considered every need from custom network publishers to one-to-many duplicators and incorporated it into the easiest to use software available.

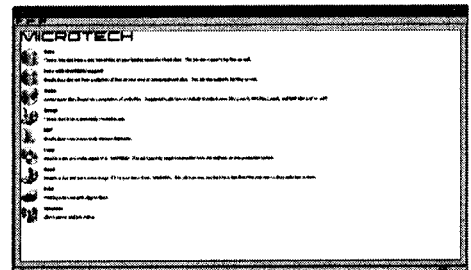
Utilizing the ImageMaker Software, Microtech customers can quickly produce replication quality CDs, DVDs and Blu-ray discs. Work from the machine, work over the network, or even work from home. Create your own disc artwork or print from pre-existing high quality artwork. Put a unique serial number on any disc. Build our software into your existing enterprise solution. The possibilities are endless.

Microtech produces the most comprehensive software suite in the disc production industry. These quality engineered programs have been refined with our 30 years of software publishing experience.

MyDisc 5.x

MyDisc 5.x software allows Microtech disc production system users to easily create or make copies of CD, DVD, or Blu-ray discs. It provides easy to use graphical workflow to run any type of duplication or unique publishing job in a clear, concise format. MyDisc can be used either directly on the disc production system itself, or remotely from computers connected via network to the production system. For one unique disc or copies of hundreds, MyDisc makes it happen.

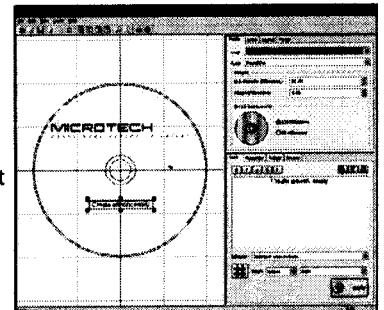
- Copy from images off the network
- Create masters from a collection of files
- Data Spanning onto multiple discs sets
- Control multiple production servers
- Copy protection feature
- Serialization support
- Supports most disc formats

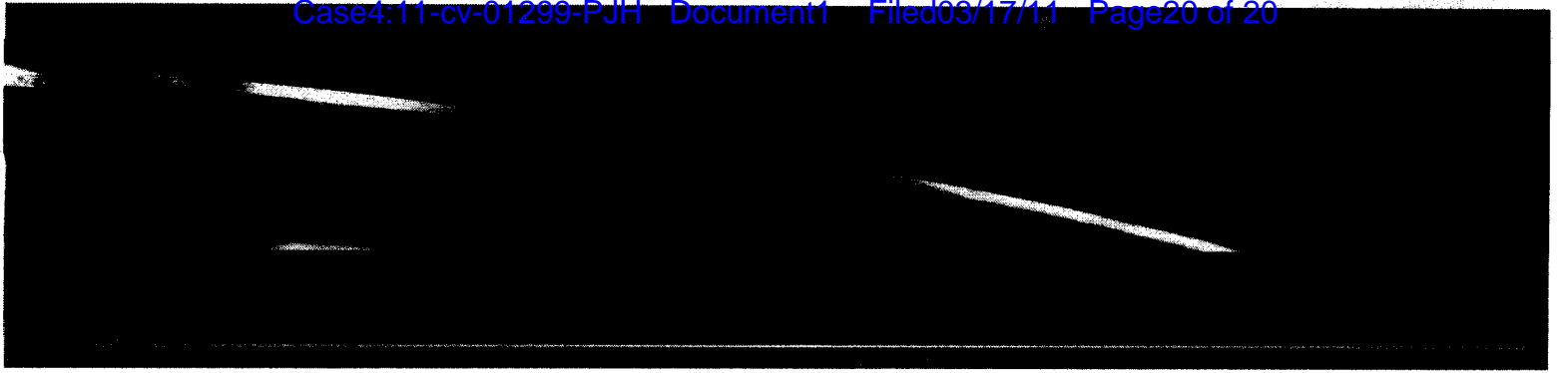


DiscPrint 5.x

DiscPrint software is the tool used for printing text and graphic images directly on a disc for a completely professional presentation. The print quality meets or exceeds discs that have been silkscreened from replication houses, but unlike pressed discs, our software allows you to generate unique text and graphics on each disc produced.

- Create custom disc labels
- Import pictures and graphics dynamically
- Edit and dynamically resize text or graphics
- Add system variables such as time and date
- Supports print merge files for printing variable text
- Supports pre-printed media with ImageAligner
- Barcode printing support
- Native PDF support

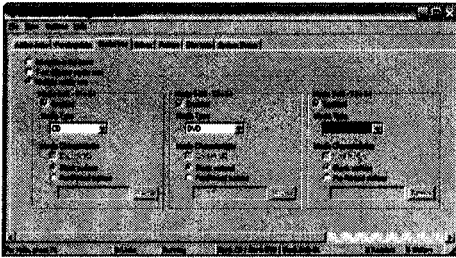




Media Remote

Media Remote is the production software control module "Brains" behind the intelligent ImageMaker 5.x Suite.

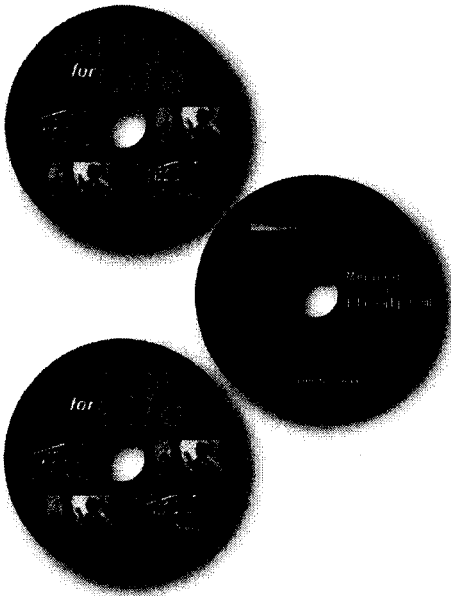
Custom applications for disc creation and publishing are easily possible with the Media Remote programmers API. Since all communication with Media Remote is done with plain text ASCII files and XML/socket API's, programming consists of writing and reading these files. Use any text editor to generate a job file with instructions for creating a disc. Jobs can also be generated by a database program or another software application.



Utilities

The ImageMaker 5.x Suite is loaded with extra utilities that have been developed for the Microtech robotic systems.

- CopyStack uses the robot to automate physical media archiving to HD or network servers. Save as raw file copies, or image formats such as .ISO.
- X-Remote allows controls and monitoring status of Microtech production servers running remotely.
- Excel spreadsheet tools for batch processing of unique data with a click of the button. Used for applications such as end of month billing statements
- Copy Protection tools for protecting CD and DVD media.
- System logs and statistical reporting tools



API'S and Integration Methods

Microtech has a complete XML based API for C++, .net, or Java development platforms in addition to the Disc-Remote file based option. Over the years Microtech has developed multiple integration methods that are in use by organizations around the world.

Call our sales team to discuss your customized integration requirements. If we have not already developed a solution for your needs, our engineering team is readily available for technical consultation.

TELEPHONE 650-596-1900
TOLL FREE 800-223-3693
INTERNATIONAL +01-650-596-1900

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