

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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CONTNET EXTRACTION AND
TRANSMISSION LLC

Plaintiff,

v.

LSSP CORPORATION D/B/A eDRAWER,

Defendant.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Plaintiff Content Extraction and Transmission LLC (“CET”), demands a jury trial and complains against defendant LSSP Corporation d/b/a (“defendant”), as follows:

THE PARTIES

1. CET is a limited liability company organized and existing under the laws of the State of New Jersey, with its principal place of business at New Jersey.

2. Upon information and belief, defendant is a limited liability company organized and existing under the laws of the State of Illinois having a place of business at 1240 Iroquois Ave Naperville, IL 60563.

JURISDICTION AND VENUE

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2 3. This action arises under the patent laws of the United States of America, Title 35 of
3 the United States Code. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and
4 1338(a).

5 4. On information and belief, defendant is doing business and committing
6 infringements in this judicial district and are subject to personal jurisdiction in this judicial district.

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8 5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

9 **CLAIM FOR PATENT INFRINGEMENT**

10 6. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
11 contained in paragraphs 1 through 5 above.

12 7. On November 2, 1993, U.S. Patent No. 5,258,855 (hereinafter referred to as “the
13 ‘855 patent”) was duly and legally issued to System X, L.P. for an invention entitled “Information
14 Processing Methodology.” A copy of the ‘855 patent is attached to this Complaint as Exhibit 1.

15 8. On November 29, 1994, U.S. Patent No. 5,369,508 (hereinafter referred to as “the
16 ‘508 patent”) was duly and legally issued to System X, L.P. for an invention entitled “Information
17 Processing Methodology.” A copy of the ‘508 patent is attached to this Complaint as Exhibit 2.

18 9. On April 29, 1997, U.S. Patent No. 5,625,465 (hereinafter referred to as “the ‘465
19 patent”) was duly and legally issued to International Patent Holdings, Ltd. for an invention entitled
20 “Information Processing Methodology.” A copy of the ‘465 patent is attached to this Complaint as
21 Exhibit 3.

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23 10. On June 16, 1998, U.S. Patent No. 5,768,416 (hereinafter referred to as “the ‘416
24 patent”) was duly and legally issued to Millennium for an invention entitled “Information
25 Processing Methodology.” A copy of the ‘416 patent is attached to this Complaint as Exhibit 4.

COUNT TWO

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2 18. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
3 contained in paragraphs 1 through 17 above.

4 19. Defendant has and still is infringing, actively inducing the infringement of and
5 contributorily infringing in this judicial district, the '508 patent by, among other things, importing,
6 making, using, offering for sale, and/or selling computer hardware, software and systems, including
7 but not limited to its eDrawer product, in which information from a hard copy document is extracted
8 and transmitted to an application program in a manner defined by the claims of the '508 patent
9 without permission from CET and will continue to do so unless enjoined by this Court.
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11 20. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
12 the '508 patent and will be irreparably harmed unless such infringing activities are enjoined by this
13 Court.

COUNT THREE

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15 21. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
16 contained in paragraphs 1 through 20 above.

17 22. Defendant has and still is infringing, actively inducing the infringement of and
18 contributorily infringing in this judicial district, the '465 patent by, among other things, importing,
19 making, using, offering for sale, and/or selling computer hardware, software and systems, including
20 but not limited to its eDrawer product, in which information from a hard copy document is extracted
21 and transmitted to an application program in a manner defined by the claims of the '465 patent
22 without permission from CET and will continue to do so unless enjoined by this Court.
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24 23. Plaintiff, CET, has been damaged by such infringing activities by the Defendant of
25 the '465 patent and will be irreparably harmed unless such infringing activities are enjoined by this
26 Court.
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COUNT FOUR

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2 24. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
3 contained in paragraphs 1 through 23 above.

4 25. Defendant has and still is infringing, actively inducing the infringement of and
5 contributorily infringing in this judicial district, the '506 patent by, among other things, importing,
6 making, using, offering for sale, and/or selling computer hardware, software and systems, including
7 but not limited to its eDrawer product, in which information from a hard copy document is extracted
8 and transmitted to an application program in a manner defined by the claims of the '506 patent
9 without permission from CET and will continue to do so unless enjoined by this Court.
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11 26. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
12 the '506 patent and will be irreparably harmed unless such infringing activities are enjoined by this
13 Court.

COUNT FIVE

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15 27. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
16 contained in paragraphs 1 through 26 above.

17 28. Defendant has and still is infringing, actively inducing the infringement of and
18 contributorily infringing in this judicial district, the '505 patent by, among other things, importing,
19 making, using, offering for sale, and/or selling computer hardware, software and systems, including
20 but not limited to its eDrawer product, in which information from a hard copy document is extracted
21 and transmitted to an application program in a manner defined by the claims of the '505 patent
22 without permission from CET and will continue to do so unless enjoined by this Court.
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24 29. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
25 the '505 patent and will be irreparably harmed unless such infringing activities are enjoined by this
26 Court.
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COUNT SIX

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2 30. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
3 contained in paragraphs 1 through 29 above.

4 31. Defendant has and still is infringing, actively inducing the infringement of and
5 contributorily infringing in this judicial district, the '887 patent by, among other things, importing,
6 making, using, offering for sale, and/or selling computer hardware, software and systems, including
7 but not limited to its eDrawer product, in which information from a hard copy document is extracted
8 and transmitted to an application program in a manner defined by the claims of the '887 patent
9 without permission from CET and will continue to do so unless enjoined by this Court.
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11 32. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
12 the '887 patent and will be irreparably harmed unless such infringing activities are enjoined by this
13 Court.

COUNT SEVEN

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15 33. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
16 contained in paragraphs 1 through 32 above.

17 34. Defendant has and still is infringing, actively inducing the infringement of and
18 contributorily infringing in this judicial district, the '434 patent by, among other things, importing,
19 making, using, offering for sale, and/or selling computer hardware, software and systems, including
20 but not limited to its eDrawer product, in which information from a hard copy document is extracted
21 and transmitted to an application program in a manner defined by the claims of the '434 patent
22 without permission from CET and will continue to do so unless enjoined by this Court.
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24 35. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
25 the '434 patent and will be irreparably harmed unless such infringing activities are enjoined by this
26 Court.
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PRAYER FOR RELIEF

WHEREFORE, THE Plaintiff, CET prays for judgment against the Defendant on all the counts and for the following relief:

- A. Declaration that the Plaintiff is the owner of the ‘855, ‘508, ‘465, ‘416, ‘505, ‘887 and ‘434 patents and that the Plaintiff has the right to sue and to recover for infringement thereof;
- B. Declaration that the ‘855, ‘508, ‘465, ‘416, ‘505 ‘887 and ‘434 patents are valid and enforceable;
- C. Declaration that the Defendant has infringed, actively induced infringement of, and contributorily infringed ‘855, ‘508, ‘465, ‘416, ‘505, ‘887 and ‘434 patents;
- D. A preliminary and permanent injunction against the Defendant, each of its officers, agents, servants, employees, and attorneys, all parent and subsidiary corporations, their assigns and successors in interest, and those persons acting in active concert or participation with them, including distributors and customers, enjoining them from continuing acts of infringement, active inducement of infringement, and contributory infringement of CET’s ‘855, ‘508, ‘465, ‘416, ‘505, ‘887 and ‘434 patents;
- E. An accounting for damages under 35 U.S.C. §284 for infringement of CET’s ‘855, ‘508, ‘465, ‘416, ‘505, ‘887 and ‘434 patents by the Defendant and the award of damages so ascertained to the Plaintiff together with interest as provided by law;
- F. Award of CET’s costs and expenses; and
- G. Such other and further relief as this Court may deem proper, just and equitable.

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DEMAND FOR JURY TRIAL

The Plaintiff, CET, demands a trial by jury of all issues properly triable by jury in this action.

By: /s/Jean-Marc Zimmerman
Jean-Marc Zimmerman (JZ 7743)
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Attorneys for Plaintiff Content Extraction
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Dated: February 13, 2012
Westfield, New Jersey