

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Zimmerman & Weiser LLP
Jean-Marc Zimmerman
Anatoly Weiser
226 St. Paul Street
Westfield, New Jersey 07090
Tel: (908) 654-8000
Fax: (908) 654-7207
jmz@iplcounsel.com
aw@iplcounsel.com

Attorneys for plaintiff Content Extraction and Transmission LLC

CONTENT EXTRACTION AND
TRANSMISSION LLC

Plaintiff,

v.

WELLS FARGO BANK, NATIONAL
ASSOCIATION,

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 Wells Fargo Bank, National Association (“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 company with a principal place of business located in Sioux Falls, South Dakota.

3. Defendant has bank branches throughout this judicial district in which it is conducting business.

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

4 14. On August 21, 2007, U.S. Patent No. 7,259,887 (hereinafter referred to as “the ‘887
5 patent”) was duly and legally issued for an invention entitled “Information Processing
6 Methodology.”

7 15. On January 6, 2009, U.S. Patent No. 7,474,434 (hereinafter referred to as “the ‘434
8 patent”) was duly and legally issued for an invention entitled “Information Processing
9 Methodology.”

10 16. CET is the owner by way of assignment of all right, title and interest in and to the
11 ‘855, ‘508, ‘465, ‘416, ‘887 and ‘434 patents. The ‘855, ‘508, ‘465 and ‘416 patents will
12 hereinafter be collectively referred to as the “Patents-in-Suit”.
13

14 **COUNT ONE**

15 17. CET repeats and incorporates herein the entirety of the allegations contained in
16 paragraphs 1 through 16 above.

17 18. Defendant infringed, actively induced the infringement of and contributorily
18 infringed in this judicial district the ‘855 patent by processing check and cash deposits made by
19 customers at its automatic teller machines (“ATMs”) using its envelope-free deposit service, and
20 by processing check deposits made from mobile electronic devices using its mobile deposit service.

21 19. Defendant's envelope-free deposit service extracts information from checks and cash
22 deposited at its ATMs and then transmits such extracted information to an application program to
23 process the deposits, in a manner defined by the claims of the ‘855 patent without permission from
24 CET.
25

26 20. Defendant's mobile deposit service extracts information from images of checks
27 taken using a mobile electronic device and then transmits such extracted information to an
28

1 application program to process the deposit, in a manner defined by the claims of the '855 patent
2 without permission from CET.

3 21. CET has been damaged by such activities of the defendant which infringe the '855
4 patent.

5 **COUNT TWO**

6 22. CET repeats and incorporates herein the entirety of the allegations contained in
7 paragraphs 1 through 21 above.

8 23. Defendant has infringe, actively induced the infringement of and contributorily
9 infringed in this judicial district the '508 patent by processing check and cash deposits made by
10 customers at its ATMs using its envelope-free deposit service, and by processing check deposits
11 made from mobile electronic devices using its mobile deposit service.

12 24. Defendant's envelope-free deposit service extracts information from checks and cash
13 deposited at its ATMs and then transmits such extracted information to an application program to
14 process the deposits, in a manner defined by the claims of the '508 patent without permission from
15 CET.

16 25. Defendant's mobile deposit service extracts information from images of checks
17 taken using a mobile electronic device and then transmits such extracted information to an
18 application program to process the deposit, in a manner defined by the claims of the '508 patent
19 without permission from CET.

20 26. CET has been damaged by such activities of the defendant which infringe the '508
21 patent.

22 **COUNT THREE**

23 27. CET repeats and incorporates herein the entirety of the allegations contained in
24 paragraphs 1 through 26 above.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DEMAND FOR JURY TRIAL

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

By: /s/Jean-Marc Zimmerman
Zimmerman & Weiser LLP
Jean-Marc Zimmerman
Anatoly Weiser
226 St. Paul Street
Westfield, New Jersey 07090
Tel: (908) 654-8000
Fax: (908) 654-7207
jmz@iplcounsel.com
aw@iplcounsel.com

Attorneys for plaintiff Content Extraction
and Transmission LLC

Dated: April 26, 2012
Westfield, New Jersey