

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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CONTENT EXTRACTION AND  
TRANSMISSION LLC  
  
Plaintiff,  
  
v.  
  
BANK OF AMERICA CORPORATION, and  
BANK OF AMERICA, NATIONAL  
ASSOCIATION,  
  
Defendants.

Case No.

COMPLAINT FOR PATENT  
INFRINGEMENT

DEMAND FOR JURY TRIAL

Plaintiff Content Extraction and Transmission LLC (“CET”) demands a jury trial and complains against defendants Bank of America Corporation and defendant Bank of America, National Association (hereinafter collectively “Defendants”), 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 Bank of America Corporation is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in the City of Charlotte, County of Mecklenburg, State of North Carolina, and having bank branches throughout this judicial district in which it is conducting business.



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

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

7 13. On August 21, 2007, U.S. Patent No. 7,259,887 (hereinafter referred to as “the ‘887  
8 patent”) was duly and legally issued for an invention entitled “Information Processing  
9 Methodology.”  
10

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

14 15. CET is the owner by way of assignment of all right, title and interest in and to the  
15 ‘855, ‘508, ‘465, ‘416, ‘887 and ‘434 patents. The ‘855, ‘508, ‘465 and ‘416 patents will hereinafter  
16 be collectively referred to as the “Patents-in-Suit.”  
17

18 **COUNT ONE**

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

21 17. Defendants have infringed, actively induced the infringement of and contributorily  
22 infringed in this judicial district the ‘855 patent by processing check and cash deposits made by  
23 customers at its automatic teller machines ("ATMs") using ATM deposit service.

24 18. Defendants’ ATM deposit service extracts information from checks and cash  
25 deposited at ATMs and then transmits such extracted information to an application program to  
26 process the deposits, in a manner defined by the claims of the ‘855 patent without permission from  
27 CET.  
28





1 continuing acts of infringement, active inducement of infringement, and contributory  
2 infringement of CET's '465 and '416 patents;

- 3 D. An accounting for damages under 35 U.S.C. §284 for infringement of CET's '855,  
4 '508, '465 and '416 patents by the Defendants and the award of damages so  
5 ascertained to the CET together with interest as provided by law;  
6 E. Award of CET's costs and expenses; and  
7 F. Such other and further relief as this Court may deem proper, just and equitable.

8 **DEMAND FOR JURY TRIAL**

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

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22 Dated: May 16, 2012  
23 Westfield, New Jersey  
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