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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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CONTENT EXTRACTION AND
TRANSMISSION LLC

Plaintiff,

v.

BANCTEC, INC.,

Defendant.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Plaintiff, Content Extraction and Transmission LLC, a limited liability company (hereinafter referred to as "CET"), demands a jury trial and complains against the 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 BancTec, Inc. (hereinafter referred to as "Defendant" or "BancTec") is a corporation organized and existing under the laws of the State of Texas, having a place of business at 2701 E. Grauwlyer Road, Irving, Texas 75061.

JURISDICTION AND VENUE

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

1 4. On information and belief, Defendant is doing business and committing
2 infringements in this judicial district and are subject to personal jurisdiction in this judicial district.

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

4 **CLAIM FOR PATENT INFRINGEMENT**

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

7 7. On November 2, 1993, U.S. Patent No. 5,258,855 (hereinafter referred to as “the
8 ‘855 patent”) was duly and legally issued to System X, L.P. for an invention entitled “Information
9 Processing Methodology.” A copy of the ‘855 patent is attached to this Complaint as Exhibit 1.

10 8. On November 29, 1994, U.S. Patent No. 5,369,508 (hereinafter referred to as “the
11 ‘508 patent”) was duly and legally issued to System X, L.P. for an invention entitled “Information
12 Processing Methodology.” A copy of the ‘508 patent is attached to this Complaint as Exhibit 2.

13 9. On April 29, 1997, U.S. Patent No. 5,625,465 (hereinafter referred to as “the ‘465
14 patent”) was duly and legally issued to International Patent Holdings, Ltd. for an invention entitled
15 “Information Processing Methodology.” A copy of the ‘465 patent is attached to this Complaint as
16 Exhibit 3.
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18 10. On June 16, 1998, U.S. Patent No. 5,768,416 (hereinafter referred to as “the ‘416
19 patent”) was duly and legally issued to Millennium for an invention entitled “Information
20 Processing Methodology.” A copy of the ‘416 patent is attached to this Complaint as Exhibit 4.

21 11. On July 25, 2000, U.S. Patent No. 6,094,505 (hereinafter referred to as “the ‘505
22 patent”) was duly and legally issued to Millennium for an invention entitled “Information
23 Processing Methodology.” A copy of the ‘505 patent is attached to this Complaint as Exhibit 5.

24 12. On August 21, 2007, U.S. Patent No. 7,259,887 (hereinafter referred to as “the ‘887
25 patent”) was duly and legally issued to Millennium for an invention entitled “Information
26 Processing Methodology.” A copy of the ‘887 patent is attached to this Complaint as Exhibit 6.
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1 13. On January 6, 2009, U.S. Patent No. 7,474,434 (hereinafter referred to as “the ‘434
2 patent”) was duly and legally issued to Millennium for an invention entitled “Information
3 Processing Methodology.” A copy of the ‘434 patent is attached to this Complaint as Exhibit 7.

4 14. CET is the owner by way of assignment of all right, title and interest in and to the
5 ‘855, ‘508, ‘465, ‘416, ‘505, ‘887 and ‘434 patents.

6 **COUNT ONE**

7 15. Plaintiff, CET, repeats and incorporates herein the entirety of the allegations
8 contained in paragraphs 1 through 14 above.

9 16. BancTec has and still is infringing, actively inducing the infringement of and
10 contributorily infringing in this judicial district, the ‘855 patent by, among other things, importing,
11 making, using, offering for sale, and/or selling computer hardware, software and systems, including
12 but not limited to its CenterVision® and ImageSentry™ products, in which information from a hard
13 copy document is extracted and transmitted to an application program in a manner defined by the
14 claims of the ‘855 patent without permission from CET and will continue to do so unless enjoined
15 by this Court.

16 17. Plaintiff, CET, has been damaged by such infringing activities by the Defendant of
17 the ‘855 patent and will be irreparably harmed unless such infringing activities are enjoined by this
18 Court.
19 Court.

20 **COUNT TWO**

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

23 19. BancTec has and still is infringing, actively inducing the infringement of and
24 contributorily infringing in this judicial district, the ‘508 patent by, among other things, importing,
25 making, using, offering for sale, and/or selling computer hardware, software and systems, including
26 but not limited to its CenterVision® and ImageSentry™ products, in which information from a hard
27 copy document is extracted and transmitted to an application program in a manner defined by the
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1 claims of the '508 patent without permission from CET and will continue to do so unless enjoined
2 by this Court.

3 20. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
4 the '508 patent and will be irreparably harmed unless such infringing activities are enjoined by this
5 Court.

6 **COUNT THREE**

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

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

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

24 25. BancTec has and still is infringing, actively inducing the infringement of and
25 contributorily infringing in this judicial district, the '506 patent by, among other things, importing,
26 making, using, offering for sale, and/or selling computer hardware, software and systems, including
27 but not limited to its CenterVision® and ImageSentry™ products, in which information from a hard
28 copy document is extracted and transmitted to an application program in a manner defined by the

1 claims of the '506 patent without permission from CET and will continue to do so unless enjoined
2 by this Court.

3 26. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
4 the '506 patent and will be irreparably harmed unless such infringing activities are enjoined by this
5 Court.

6 **COUNT FIVE**

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

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

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

24 31. BancTec has and still is infringing, actively inducing the infringement of and
25 contributorily infringing in this judicial district, the '887 patent by, among other things, importing,
26 making, using, offering for sale, and/or selling computer hardware, software and systems, including
27 but not limited to its CenterVision® and ImageSentry™ products, in which information from a hard
28 copy document is extracted and transmitted to an application program in a manner defined by the

1 claims of the '887 patent without permission from CET and will continue to do so unless enjoined
2 by this Court.

3 32. Plaintiff, CET, has been damaged by such infringing activities by the Defendant, of
4 the '887 patent and will be irreparably harmed unless such infringing activities are enjoined by this
5 Court.

6 **COUNT SEVEN**

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

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

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

- 24 A. Declaration that the Plaintiff is the owner of the '855, '508, '465, '416, '505, '887
25 and '434 patents and that the Plaintiff has the right to sue and to recover for
26 infringement thereof;
- 27 B. Declaration that the '855, '508, '465, '416, '505 '887 and '434 patents are valid and
28 enforceable;

- 1 C. Declaration that the Defendant has infringed, actively induced infringement of, and
2 contributorily infringed '855, '508, '465, '416, '505, '887 and '434 patents;
- 3 D. A preliminary and permanent injunction against the Defendant, each of its officers,
4 agents, servants, employees, and attorneys, all parent and subsidiary corporations,
5 their assigns and successors in interest, and those persons acting in active concert or
6 participation with them, including distributors and customers, enjoining them from
7 continuing acts of infringement, active inducement of infringement, and contributory
8 infringement of CET's '855, '508, '465, '416, '505, '887 and '434 patents;
- 9 E. An accounting for damages under 35 U.S.C. §284 for infringement of CET's '855,
10 '508, '465, '416, '505, '887 and '434 patents by the Defendant and the award of
11 damages so ascertained to the Plaintiff together with interest as provided by law;
- 12 F. Award of CET's costs and expenses; and
- 13 G. Such other and further relief as this Court may deem proper, just and equitable.

14 **DEMAND FOR JURY TRIAL**

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

17 By: /s/Jean-Marc Zimmerman
18 Jean-Marc Zimmerman (JZ 7743)
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22 Attorneys for Plaintiff Content Extraction
23 and Transmission LLC

24 Dated: December 2, 2011
25 Westfield, New Jersey