EXHIBIT B

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NORTHERN DISTRICT OF CALIFORNIA

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E-Filing

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

THE PROCTER & GAMBLE COMPANY,

Plaintiff,

v.

KRAFT FOODS GLOBAL, INC.,

Defendant.

Case No.: C 07 4413 JCS

COMPLAINT FOR PATENT INFRINGEMENT; DEMAND FOR JURY TRIAL

DEMAND FOR JURY TRIAL

Plaintiff The Procter & Gamble Company ("P&G"), for its Complaint against defendant Kraft Foods Global, Inc. ("Kraft"), alleges as follows:

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THE PARTIES

1. Plaintiff P&G is an Ohio corporation with its principal place of business in Cincinnati, Ohio.

2. Defendant Kraft is a Delaware corporation with its principal place of business in Northfield, Illinois.

JURISDICTION

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, including 35 U.S.C. § 271 *et seq.* The Court has personal jurisdiction over Kraft because the acts complained of have taken place in this district, including, on information and belief, through Kraft's manufacture of infringing products at its plant in San Leandro, California. Kraft has established minimum contacts with this district such that the exercise of jurisdiction over Kraft would not offend traditional notions of fair play and substantial justice.

VENUE

4. Kraft does business in this district, including, on information and belief, by manufacturing infringing products at its plant located in San Leandro, California, and by providing infringing products that are sold in this district. Venue is proper in this district pursuant to 28 U.S.C. §§ 1331, 1391(b), (c) and 1400(b).

INTRADISTRICT ASSIGNMENT

5. On information and belief, Kraft manufactures infringing products at its San Leandro plant, located in Alameda County. Pursuant to Civil Local Rule 3-2(c), because this is an Intellectual Property Action, it can be assigned to the San Francisco Division.

INFRINGEMENT OF U.S. PATENT NO. 7,169,418

6. On January 30, 2007, the United States Patent & Trademark Office ("USPTO") duly and legally issued United States Patent 7,169,418 ("the '418 Patent"), entitled "Packaging system to provide fresh packed coffee." The '418 Patent was issued to inventors David Dalton, James Smith, James Bono, Sameer Mungur, Douglas Zeik, Aisha Barry, and Jennifer Ruth Floyd. These inventors have assigned all rights and interest in the '418 Patent to P&G. A true and correct copy of the '418

patent is attached hereto as Exhibit A.

7. Kraft has infringed and continues to infringe the '418 Patent. The infringing acts include at least manufacturing, using, selling, and/or offering to sell 39-ounce plastic containers of Maxwell House brand coffee. Kraft is liable for infringement of the '418 Patent pursuant to 35 U.S.C. § 271.

8. Kraft's acts of infringement have caused and are causing damage to P&G. P&G is entitled to recover from Kraft the damages sustained by P&G as a result of Kraft's infringement in an amount to be proven at trial. Kraft's infringement of P&G's rights under the'418 Patent also is causing, and will continue to cause, irreparable harm to P&G's business, for which there is no adequate remedy at law, unless P&G is enjoined by this Court.

9. Upon information and belief, Kraft's infringement of the'418 Patent is willful and deliberate, entitling P&G to increased damages under 35 U.S.C. § 284 and attorney fees incurred in prosecuting this action under 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff P&G prays for judgment and seeks relief against Defendant Kraft as follows:

(a) For judgment that the '418 Patent has been infringed by Kraft;

(b) For preliminary and permanent injunctions enjoining the aforesaid acts of infringement by Kraft, its officers, agents, servants, employees, subsidiaries and attorneys, and those persons acting in concert with Kraft, including related individuals and entities, customers, representatives, dealers, and distributors;

(c) For an award of actual damages;

(d) For an award of pre-judgment and post-judgment interest, according to proof;

(e) For an award of enhanced damages pursuant to 35 U.S.C. § 284;

(f) For an award of attorney fees pursuant to 35 U.S.C. § 285 or as otherwise permitted by law;

(g) For all costs of suit; and

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(h) For such other and further relief as the Court may deem just and proper.

DATED: August 27, 2007

Respectfully submitted,

By _____

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JURY DEMAND

P&G demands a jury trial on all issues that are triable by right to a jury.

DATED: August 27, 2007

Respectfully submitted,

By _____

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