A TRUE COPY ATTEST
MICHAEL W. DOBBINS, CLERK
By: s/ MAYA BURKE
DEPUTY CLERK
U.S. DISTRICT COURT, NORTHERN
DISTRICT OF ILLINOIS
DATE: MAY 16, 2008

AO279, ASHMAN, TERMED, TRANSFER

United States District Court
Northern District of Illinois - CM/ECF LIVE, Ver 3.1.3 (Chicago)
CIVIL DOCKET FOR CASE #: 1:08-cv-01218
Internal Use Only

Papst Licening GmbH & Co. KG v. Ricoh Company, Ltd. et al
Assigned to: Honorable Marvin E. Aspen
Cause: 35:145 Patent Infringement

Date Filed: 02/28/2008
Date Terminated: 05/16/2008
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

Papst Licening GmbH & Co. KG represented by **James Patrick White**
Welsh & Katz, Ltd.
120 South Riverside Plaza
22nd Floor
Chicago, IL 60606
(312) 655-1500
Email: jpwhite@welshkatz.com
LEAD ATTORNEY

Jerold B. Schnayer
Welsh & Katz, Ltd.
120 South Riverside Plaza
22nd Floor
Chicago, IL 60606
(312) 655-1500
Email: jbschnayer@welshkatz.com
ATTORNEY TO BE NOTICED

John L. Ambrogi
Welsh & Katz, Ltd.
120 South Riverside Plaza
22nd Floor
Chicago, IL 60606
(312) 655-1500
Fax: (312) 655-1501
Email: jambrogi@welshkatz.com
ATTORNEY TO BE NOTICED

V.

Defendant

Ricoh Company, Ltd.

Defendant

Ricoh Americas Corporation

Defendant

Ricoh Corporation

represented by **Brent Allen Hawkins**
McDermott Will & Emery LLP
227 W. Monroe Street
Suite 4400
Chicago, IL 60606
312.984.7764
Fax: 312.984.7700
Email: bhawkins@mwe.com
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
02/28/2008	1	COMPLAINT filed by Papst Licening GmbH & Co. KG; Jury Demand. Filing fee $ 350.(ef,) (Entered: 03/03/2008)
02/28/2008	2	CIVIL Cover Sheet. (ef,) (Entered: 03/03/2008)
02/28/2008	3	(Court only) RECEIPT regarding payment of filing fee paid on 2/28/2008 in the amount of $350.00, receipt number 2575444. (ef,) (Entered: 03/03/2008)
03/03/2008		MAILED patent report to Patent Trademark Office, Alexandria, VA. (ef,) (Entered: 03/03/2008)
03/03/2008	4	ATTORNEY Appearance for Plaintiff Papst Licening GmbH & Co. KG by James Patrick White (White, James) (Entered: 03/03/2008)
03/03/2008	5	ATTORNEY Appearance for Plaintiff Papst Licening GmbH & Co. KG by Jerold B. Schnayer (Schnayer, Jerold) (Entered: 03/03/2008)
03/03/2008	6	MINUTE entry before Judge Marvin E. Aspen dated 3/3/08:Status hearing set for 4/10/2008 at 10:30 AM., in Courtroom 2525. The plaintiff is to notify the defendants of status date.Judicial staff mailed notice (gl,) (Entered: 03/03/2008)
03/04/2008	7	Papst Licensing GmbH & Co. KG Rule 7.1 Corporate Disclosure Statement by Papst Licening GmbH & Co. KG (Ambrogi, John) (Entered: 03/04/2008)
03/04/2008	8	Local Rule 3.4 Notice of Claims Involving Patents by Papst Licening GmbH & Co. KG (Ambrogi, John) (Entered: 03/04/2008)
03/04/2008	9	ATTORNEY Appearance for Plaintiff Papst Licening GmbH & Co. KG by John L. Ambrogi (Ambrogi, John) (Entered: 03/04/2008)
03/05/2008	10	SUMMONS Issued as to Defendants Ricoh Company, Ltd., Ricoh Americas Corporation, Ricoh Corporation. (ef,) (Entered: 03/06/2008)
03/18/2008	11	ALIAS Summons Issued as to Ricoh Americas Corporation. (hp,) (Entered: 03/19/2008)

03/21/2008	12	SUMMONS Returned Executed by Papst Licening GmbH & Co. KG as to Ricoh Corporation on 3/14/2008, answer due 4/3/2008. (Ambrogi, John) (Entered: 03/21/2008)
03/21/2008	13	SUMMONS Returned Unexecuted by Papst Licening GmbH & Co. KG as to Ricoh Americas Corporation. (Ambrogi, John) (Entered: 03/21/2008)
03/21/2008	14	NOTICE by Papst Licening GmbH & Co. KG *Of Conditional Transfer Order* (Ambrogi, John) (Entered: 03/21/2008)
04/04/2008	15	Return of Service of Summons by Papst Licening GmbH & Co. KG (Ambrogi, John) (Entered: 04/04/2008)
04/07/2008	16	MINUTE entry before Judge Honorable Marvin E. Aspen dated 4/7/08:The status hearing set for 4/10/08 is reset to 5/22/2008 at 10:30 AM.)Judicial staff mailed notice (gl,) (Entered: 04/07/2008)
04/10/2008	17	ATTORNEY Appearance for Defendant Ricoh Corporation by Brent Allen Hawkins (Hawkins, Brent) (Entered: 04/10/2008)
05/13/2008	18	CONDITIONAL TRANSFER ORDER from MDL Panel transferring case to the District of Columbia. (mb,) (Entered: 05/16/2008)
05/16/2008		(Court only) ***Civil Case Terminated pursuant to MDL No. 1880. Conditional Transfer Order filed on 5/13/08. (mb,) (Entered: 05/16/2008)
05/16/2008	19	TRANSFERRED to the the District of Columbia the original file, certified copy of MDL transfer order, and docket sheet via email. (mb,) (Entered: 05/16/2008)

NF
FILED
FEBRUARY 28, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PAPST LICENSING GmbH & Co. KG Plaintiff, v. RICOH COMPANY, LTD., RICOH AMERICAS CORPORATION and RICOH CORPORATION, Defendants.	Civil Action No. *DEMAND FOR JURY TRIAL*

08 C 1218

JUDGE ASPEN
MAGISTRATE JUDGE ASHMAN

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Papst Licensing GmbH & Co. KG ("Papst Licensing"), by and through counsel, for its Complaint against defendants Ricoh Company, Ltd. (“Ricoh”), and Ricoh Americas Corporation (“Ricoh Americas”) and Ricoh Corporation (“Ricoh Corporation’), (collectively “the Ricoh Defendants”), states as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction (federal question) of Papst Licensing’s patent infringement claims pursuant to 28 U.S.C. §1331 and 1338(a) because this action arises under the patent laws of the United States. 35 U.S.C. §§ 1, *et seq.*

2. Venue is proper in the District of Delaware pursuant to 28 U.S.C. §§ 1391(c), 1391(d) and 1400(b).

3. Papst Licensing is a company existing under the laws of The Federal Republic of Germany with its principal place of business headquartered at Bahnofstrasse 33, 78112 St. Georgen, Germany.

4. Upon information and belief, Ricoh is located at Ricoh Building, 8-13-1 Ginza Chuo-ku, Tokyo 104-8222, Japan.

5. Upon information and belief, Ricoh is a multinational corporation having an established and on-going business throughout the United States, and particularly, transacts business in this district through Ricoh Americas and Ricoh Corporation. Upon information and belief, Ricoh Americas has regular and established places of business throughout this district and Ricoh Corporation regularly transacts business throughout this district.

6. Upon information and belief, Ricoh is the ultimate parent company of Ricoh Americas.

FACTS GIVING RISE TO THIS ACTION

7. The patents listed in Paragraphs Nos. 8 and 9 below cover, *inter alia*, various aspects of digital cameras. Unless otherwise specified, the said patents are collectively referred to hereinafter as the "Patents in Suit." Papst Licensing is the lawful owner, by assignment, of the entire right, title, and interest in and to each and every one of the Patents in Suit.

8. United States Patent No. 6,470,399 B1 duly and legally issued on October 22, 2002.

9. United States Patent No. 6,895,449 B2 duly and legally issued on May 17, 2005.

10. Upon information and belief the Ricoh Defendants have made, used, sold or offered to sell to numerous customers in the United States or have imported into the United States digital cameras which infringe the Patents in Suit.

11. A reasonable opportunity for further investigation or discovery is likely to provide evidentiary support that the Ricoh Defendants have actively induced others and/or contributed to the infringement of the Patents in Suit.

12. A reasonable opportunity for further investigation or discovery is likely to provide evidentiary support that the Ricoh Defendants committed the acts of infringement described herein willfully.

13. Papst Licensing has given written notice of infringement to the Ricoh Defendants.

14. Upon information and belief, the Ricoh Defendants have been and still are committing the acts of infringement described herein and will continue to do so unless enjoined by this Court.

DEMAND FOR JURY TRIAL

Plaintiff respectfully requests a trial by jury of all issues so triable.

REQUESTED RELIEF

WHEREFORE, Papst Licensing respectfully requests the following relief

1. the entry of judgment in favor of Papst Licensing, and against the Ricoh Defendants, finding that the Ricoh Defendants have infringed the Patents in Suit;

2. the entry of judgment in favor of Papst Licensing, and against the Ricoh Defendants, awarding Papst Licensing damages adequate to compensate it for the Ricoh Defendants' acts of infringement;

3. the entry of judgment in favor of Papst Licensing, and against the Ricoh Defendants, awarding Papst Licensing all applicable interest (including pre-judgment and post-judgment interest), costs, an increase of damages to three times the amount of damages found or assessed, and attorneys' fees;

4. the entry of a permanent injunction enjoining the Ricoh Defendants, and all those acting in concert of participation with them, from further acts of infringement; and

5. such other and further relief as the Court deems just and proper.

February 28, 2008

Respectfully submitted,

/s/ Jerold B. Schnayer

Jerold B. Schnayer (2495538)
James P. White (3001032)
WELSH & KATZ, LTD.
120 South Riverside Plaza, 22nd Floor
Chicago, Illinois 60606
(312) 655-1500

Attorneys for PAPST LICENSING GmbH & Co. KG