UNITED STATES DISTRICT COURT
DISTRICT FOR THE NORTHERN DISTRICT OF ILLINOIS

PAPST LICENSING GmbH & Co. KG
Plaintiff,

v.

NIKON CORPORATION, NIKON AMERICAS, INC. and NIKON, INC.
Defendants

Civil Action No.

FILED: MAY 02, 2008
08CV2510 RCC
JUDGE DER-YEGHIAYAN
MAGISTRATE JUDGE ASHMAN

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Papst Licensing GmbH & Co. KG ("Papst Licensing"), by and through counsel, for its Complaint against defendants Nikon Corporation ("Nikon"), Nikon Americas, Inc. ("Nikon Americas") and Nikon, Inc. ("Nikon USA"), (collectively "the Nikon 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, Nikon is located at Fuji Building, 2-3 Marunouchi 3-chome, Chiyoda-ku, Tokyo, Japan.

5. Upon information and belief, Nikon Americas is a corporation organized and existing under the laws of the State of Delaware and is located at 1300 Walt Whitman Road, Melville, NY 11747. Upon information and belief Nikon, Inc. is a corporation organized and existing under the laws of the State of New York and has its headquarters located at 1300 Walt Whitman Road,, Melville, NY 11747.

6. Upon information and belief, Nikon is a multinational corporation having an established and on-going business throughout the United States, and particularly, transacts business in this district through Nikon Americas and Nikon, Inc. Nikon, Inc. regularly transacts business in this district and maintains a branch office in this district located at 8120 Lehigh Avenue, Morton Grove, Illinois 60053.

7. Upon information and belief, Nikon is the ultimate parent company of Nikon Americas which in turn is the ultimate domestic parent company of Nikon, Inc.

FACTS GIVING RISE TO THIS ACTION

8. The patents listed in Paragraphs Nos. 9 and 10 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.

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

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

11. Upon information and belief the Nikon 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.

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

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

14. Papst Licensing has given written notice of infringement to the Nikon Defendants.

15. Upon information and belief, the Nikon 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 Nikon Defendants, finding that the Nikon Defendants have infringed the Patents in Suit;

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

3. the entry of judgment in favor of Papst Licensing, and against the Nikon 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 Nikon 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.

May 2, 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