

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CANON INC.,)	
)	Case No. <u>22-cv-2057</u>
Plaintiff,)	
)	PLAINTIFF CANON INC.’S
vs.)	COMPLAINT FOR PATENT
)	INFRINGEMENT
KATUN CORPORATION and GENERAL)	
PLASTIC INDUSTRIAL CO. LTD.,)	JURY TRIAL DEMANDED
)	
Defendants.)	

Plaintiff Canon Inc. (“Canon”) brings this action for patent infringement against Defendants Katun Corporation and General Plastic Industrial Co. Ltd. (“Defendants”), and alleges as follows:

The Parties

1. Canon is a corporation organized and existing under the laws of Japan, having its principal place of business at 30-2, Shimomaruko 3-chome, Ohta-ku, Tokyo 146-8501, Japan.
2. Canon is a leading innovator, manufacturer, and seller of a wide variety of copying machines, laser beam printers, inkjet printers, cameras, and other consumer, business, and industrial products.
3. On information and belief, Katun Corporation (“Katun”) is a corporation organized and existing under the laws of the State of Minnesota, with its principal place of business located at 10951 Bush Lake Road, Minneapolis, Minnesota 55438-2391.
4. On information and belief, General Plastic Industrial Co. Ltd. (“GPI”) is an

entity registered in Taiwan, with its principal place of business located at No. 50, Tzu-Chiang Road, Wu-Chi Dist., Taichung, Taiwan 43547.

5. On information and belief, Katun is a wholly-owned subsidiary of GPI.

6. On information and belief, Defendants are under common ownership and control and part of a common enterprise known as “GPI”, “General Plastic,” or the “GPI Organization.”

Jurisdiction and Venue

7. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Katun because its principal place of business is located in this judicial district, and over all Defendants because each has, directly or through intermediaries, committed acts within Minnesota giving rise to this action and/or has established minimum contacts with Minnesota such that the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice.

9. Venue with respect to Katun is proper under 28 U.S.C. § 1400(b). Katun is organized in, and thus resides in, the State of Minnesota and this judicial district. Katun also has committed infringing acts in this judicial district and has a regular and established place of business in this judicial district.

10. Venue with respect to GPI is proper under 28 U.S.C. §§ 1391(b) and (c) because it does not reside in the United States and therefore may be sued in any judicial

district where it is subject to the court's personal jurisdiction, including here in this judicial district.

Canon's Patent-in-Suit

11. On July 19, 2022, U.S. Patent No. 11,392,056 (the "'056 patent"), titled "Developer Supply Container and Developer Supplying System," duly and legally issued to Canon as assignee of the inventor, Tsukasa Mine.

12. Canon is the sole owner of the entire right, title, and interest in and to the '056 patent, including the right to sue and recover for any and all infringements thereof.

13. The '056 patent is valid and enforceable.

Defendants' Infringing Activities

14. On information and belief, Defendants are engaged in the business of selling and/or offering to sell in the United States and/or importing into the United States unauthorized toner supply containers for use in one or more Canon copying machines, including but not limited to the copying machines listed in the table below, which toner supply containers (hereinafter, "Accused Products") infringe one or more claims of the '056 patent.

Canon Copying Machines	Canon Toner Supply Container Designation	Katun Part Number (If Known)¹
Canon imageRUNNER® Advance C250iF, C255iF, C350P, C350iF, C355iF	GPR-51 (K, C, M, Y)	53442, 53443, 53444, 53445
Canon imageRUNNER® C1325iF, C1335iF	GPR-52 (K, C, M, Y)	
Canon imageRUNNER® C3025i, C3125i Canon imageRUNNER® Advance C3325i, C3330i, C3525i, C3525i II, C3525i III, C3530i, C3530i II, C3530i III Canon imageRUNNER® Advance DX C3725i, C3730i	GPR-53 (K, C, M, Y) GPR-53L (C, M, Y)	53405, 53406, 53407, 53408
Canon imageRUNNER® Advance C5535i, C5535i II, C5535i III, C5540i, C5540i II, C5540i III, C5550i, C5550i II, C5550i III, C5560i, C5560i II, C5560i III Canon imageRUNNER® Advance DX C5735i, C5740i, C5750i, C5760i	GPR-55 (K, C, M, Y) GPR-55L (C, M, Y)	53374, 53375, 53376, 53377
Canon imageRUNNER® Advance DX 6000i	GPR-55 (K)	53374
Canon imageRUNNER® Advance 4525i, 4525i II, 4525i III, 4535i, 4535i II, 4535i III, 4545i, 4545i II, 4545i III, 4551i, 4551i II, 4551i III	GPR-57 (K)	53530

¹ The Accused Products are not limited to those with the Katun part numbers listed here. For example, Canon's investigator purchased infringing GPR-58 compatible toner supply containers from Sun Data Supply Inc. that, on information and belief, were manufactured by GPI and drop-shipped by ACM Technologies, Inc. These Accused Products did not have Katun part numbers.

Canon imageRUNNER® Advance DX4725i, DX4735i, DX4745i, DX4751i		
Canon imageRUNNER® Advance C256iF II, C256iF III, C356iF II, C356iF III Canon imageRUNNER® Advance DX C257iF, C357iF	GPR-58 (K, C, M, Y)	53431, 53432, 53433, 53434
Canon imageRUNNER® Advance DX C5840i, C5850i, C5860i, C5870i	GPR-61 (K, C, M, Y) GPR-61L (C, M, Y)	
Canon imageRUNNER® 2630	GPR-62 (K)	
Canon imageRUNNER® Advance DX 6860i, 6870i	GPR-63 (K)	

15. On information and belief, the Accused Products are manufactured by GPI in Taiwan and thereafter are imported into the United States and offered for sale and sold within the United States by Defendants and others.

16. On information and belief, Defendants offer to sell and sell the Accused Products within this judicial district and elsewhere, including through websites such as *gpi.com.tw* and/or *katun.com*.

First Cause of Action: Infringement of U.S. Patent No. 11,392,056

17. Canon repeats and incorporates by reference the allegations of paragraphs 1-16, as though set forth here in their entirety.

18. Defendants have directly infringed and are directly infringing claims 1-34 of the '056 patent by making, using, selling, and/or offering for sale within the United

States, and/or importing into the United States, Accused Products embodying the inventions claimed in the '056 patent, without authority of Canon.

19. Defendants also have indirectly infringed and are indirectly infringing the '056 patent at least by virtue of their inducement of direct infringement of that patent by others who use, sell, and/or offer for sale within the United States, and/or who import into the United States, Accused Products. Defendants were given notice of the '056 patent and their infringement thereof by no later than July 21, 2022, when Canon's counsel sent Defendants' counsel a letter and claim chart informing Defendants that the Accused Products infringe multiple claims of the '056 patent, including but not limited to claim 1. On information and belief, despite knowing of the '056 patent and their infringement thereof, Defendants have induced and continue to induce customers to use, sell, and/or offer for sale within the United States, and/or import into the United States, Accused Products, including, for example, by promoting them for use in specific copying machines, providing customers with instructions for using them in those copying machines, promoting their products to resellers in the United States, and/or offering logistics support to resellers in the United States. *See, e.g.*, <https://www.gpi.com.tw/en/services-4.html>.

20. The following paragraphs 24-71 show how an exemplary one of Defendants' Accused Products, a GPR-51 (K) compatible toner supply container with Katun part number 53442, infringes each independent claim of the '056 patent.

21. On information and belief, the exemplary Accused Product shown below is substantially the same as the other Accused Products in all relevant respects, and thus is representative of all Accused Products.

22. The Court has not yet construed the meaning of any claims or terms in the '056 patent. In providing these detailed allegations, Canon does not intend to convey or imply any particular claim construction or the precise scope of the claims. Canon's contentions regarding the construction of the claims will be provided in compliance with the case schedule, any applicable federal or local procedural rules, and/or any applicable orders.

23. Canon contends that each element of each asserted claim is literally present in the Accused Products. If, as a result of the Court's constructions or other determinations, one or more claim elements are not literally present, Canon contends that each such element is present under the doctrine of equivalents and reserves its right to provide more detailed doctrine of equivalents contentions after discovery, a claim construction order from the Court, or at another appropriate time.

24. Infringed independent claim 1 of the '056 patent recites:

A developer supply container comprising:

a developer accommodating portion accommodating developer;

a developer discharging portion in fluid communication with the developer accommodating portion, with the developer accommodating portion being rotatable about a rotational axis and relative to the developer discharging portion, and with the

developer discharging portion being provided with a developer discharge opening configured to permit discharging of the developer to outside of the developer supply container;

a sliding portion including a hook, the hook being provided such that, when the developer supply container is oriented with the developer discharge opening positioned at a bottom side of the developer discharging portion, the hook is positioned below a horizontal plane that includes the rotational axis;

a guiding portion configured to engage the sliding portion, wherein the sliding portion is slidable, while being guided by the guiding portion, relative to the developer discharging portion between a first position and a second position, with the hook being closer to the horizontal plane when the sliding portion is at the second position than the hook is to the horizontal plane when the sliding portion is at the first position, and with the hook being closer to the developer accommodating portion in a direction of the rotational axis when the sliding portion is at the second position than the hook is to the developer accommodating portion in the direction of the rotational axis when the sliding portion is at the first position; and

an arm portion including an arm extending from a part of the arm portion in a direction away from the developer discharging portion, the arm being configured to receive a force from outside of the developer supply container, the arm portion being configured to be movable in the direction of the rotational axis toward the developer accommodating portion so as to cause the sliding portion to slide from the first position to the second position as the sliding portion is guided by the guiding portion.

25. As shown in Figures 1 and 2 below, the representative Accused Product is a developer (toner) supply container. In Figure 1 the developer supply container is shown with the cover on, and in Figure 2 it is shown with the cover removed.

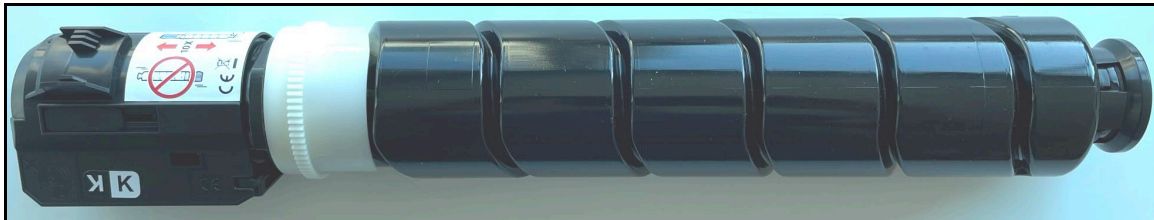


Figure 1

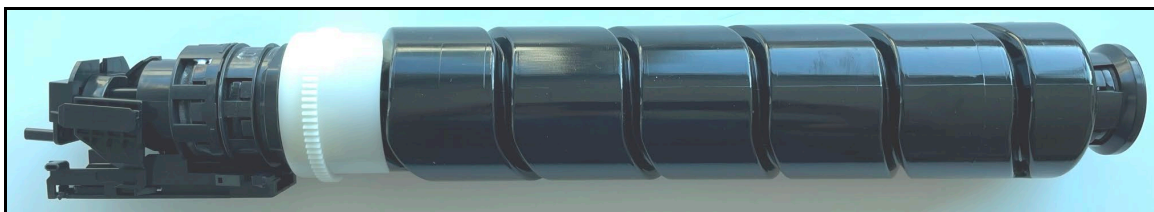


Figure 2

26. As shown in Figure 3 below, the representative Accused Product includes a developer accommodating portion that accommodates developer (toner).



Figure 3

27. As shown in Figure 4 below, the representative Accused Product includes a developer discharging portion in fluid communication with the developer accommodating portion.

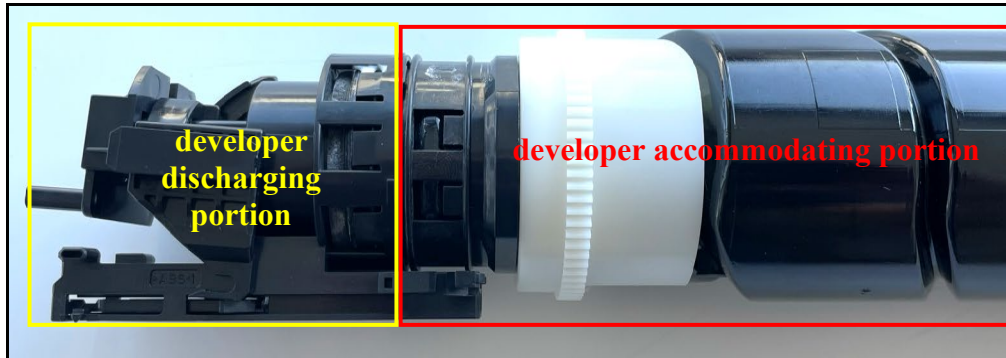


Figure 4

28. As shown in Figure 5 below, the developer accommodating portion is rotatable about a rotational axis and relative to the developer discharging portion.

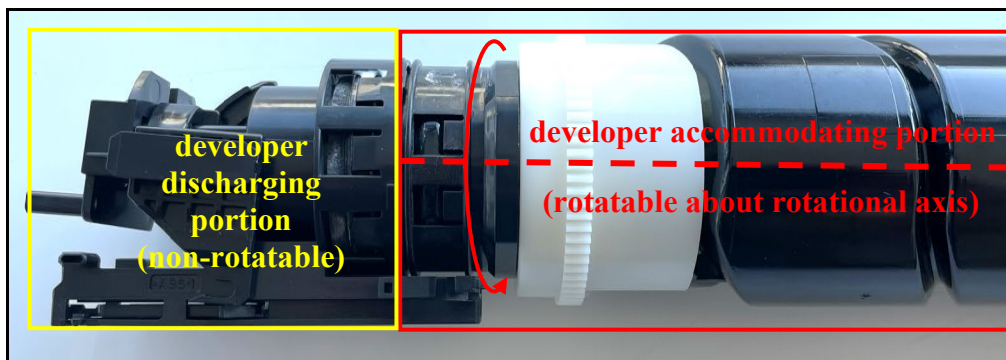


Figure 5

29. As shown in Figure 6 below (where the shutter has been pulled back), the developer discharging portion is provided with a developer discharge opening configured to permit discharging of the developer to outside of the developer supply container.

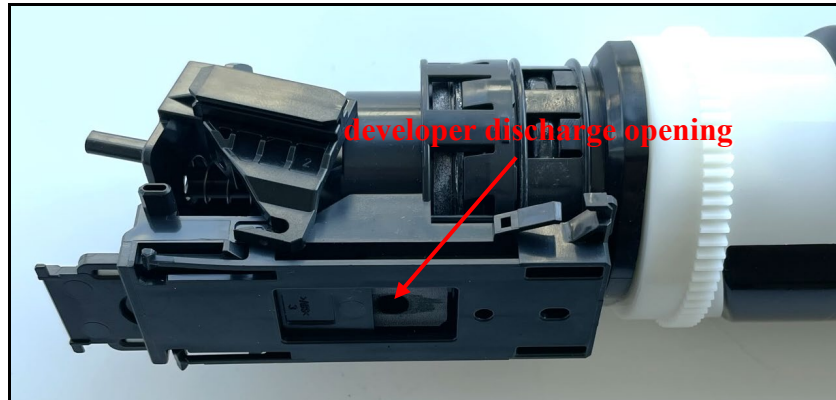


Figure 6

30. As shown in Figure 7 below, the representative Accused Product includes a sliding portion including a hook.

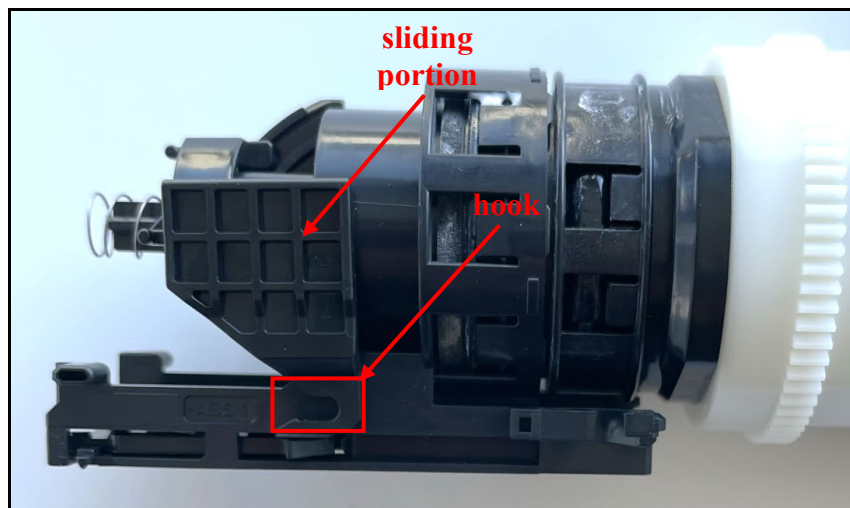
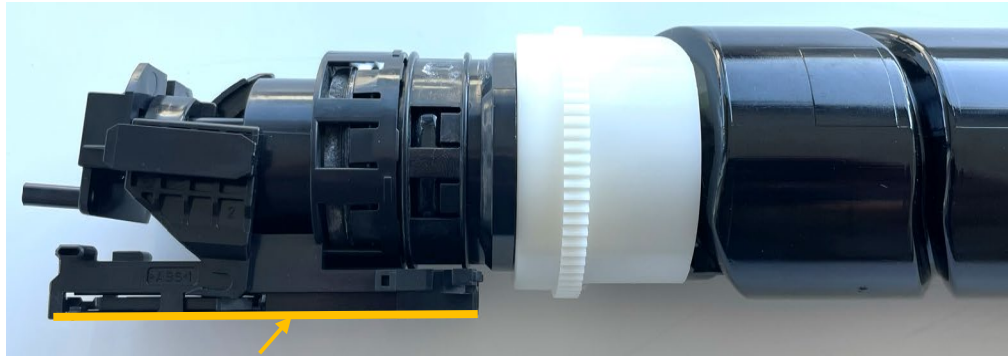
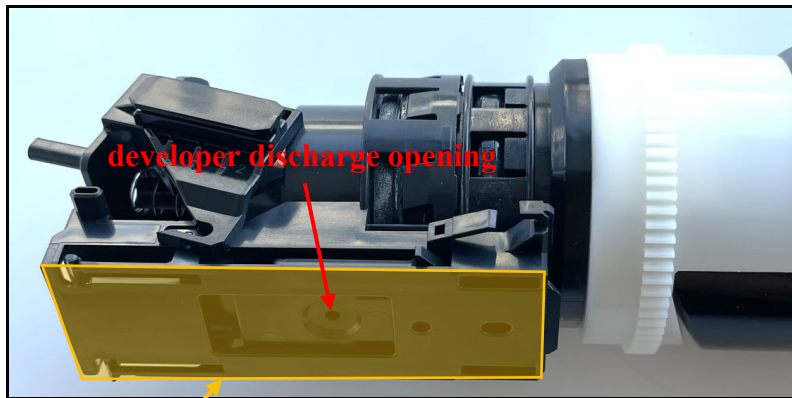


Figure 7

31. As shown in Figures 8-11 below, the hook is provided such that, when the developer supply container is oriented with the developer discharge opening positioned at a bottom side of the developer discharging portion, the hook is positioned below a horizontal plane that includes the rotational axis. This is true whether the hook is positioned as shown in Figure 10, as shown in Figure 11, or anywhere in between.



bottom side Figure 8



bottom side Figure 9

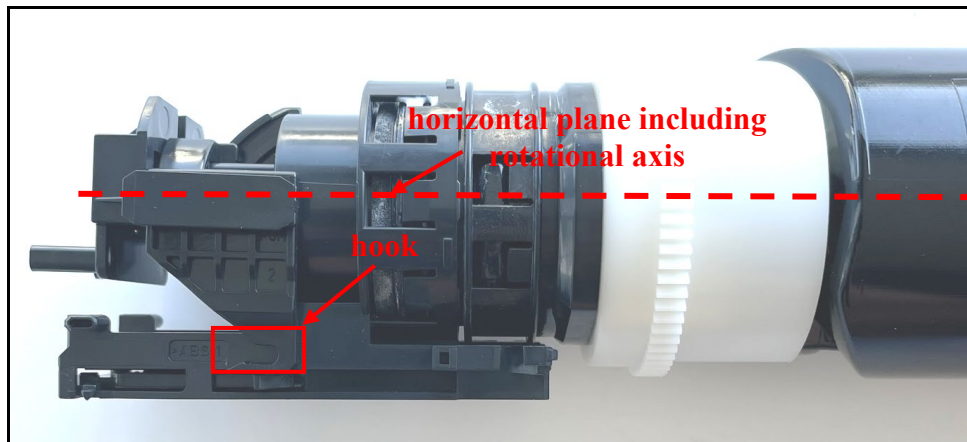


Figure 10

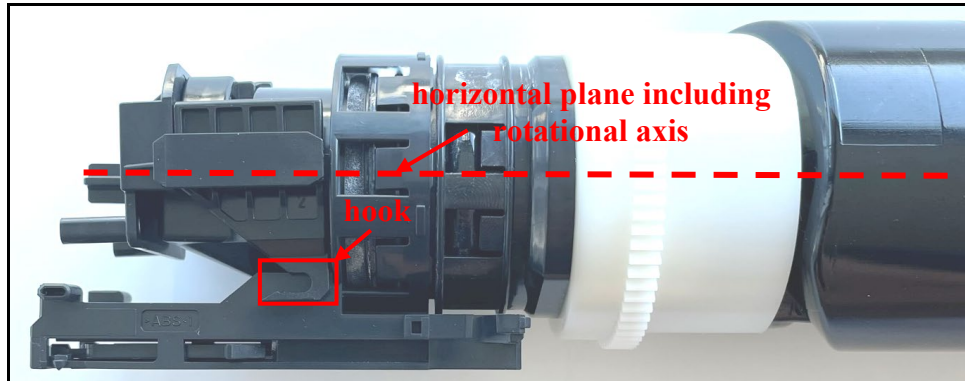


Figure 11

32. As shown in Figures 12-14 below, the representative Accused Product includes a guiding portion configured to engage the sliding portion.

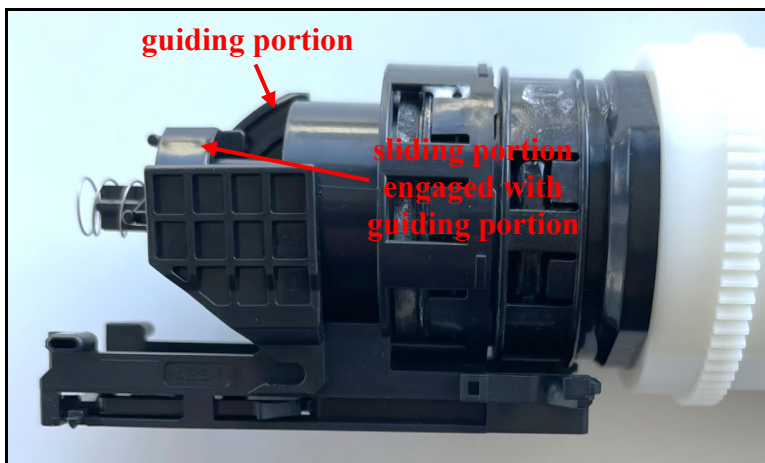


Figure 12

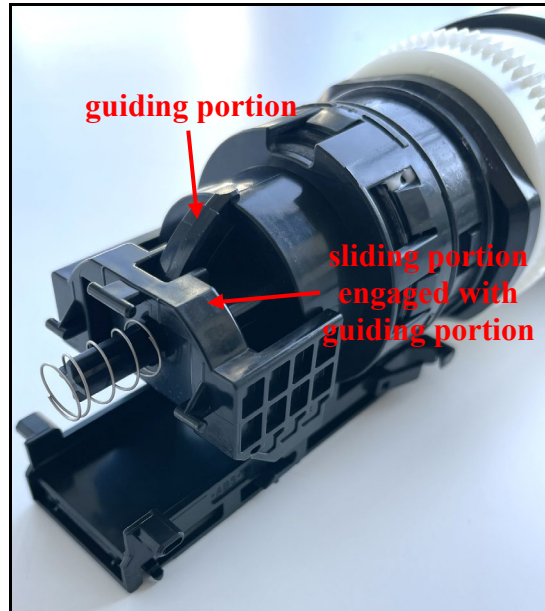


Figure 13

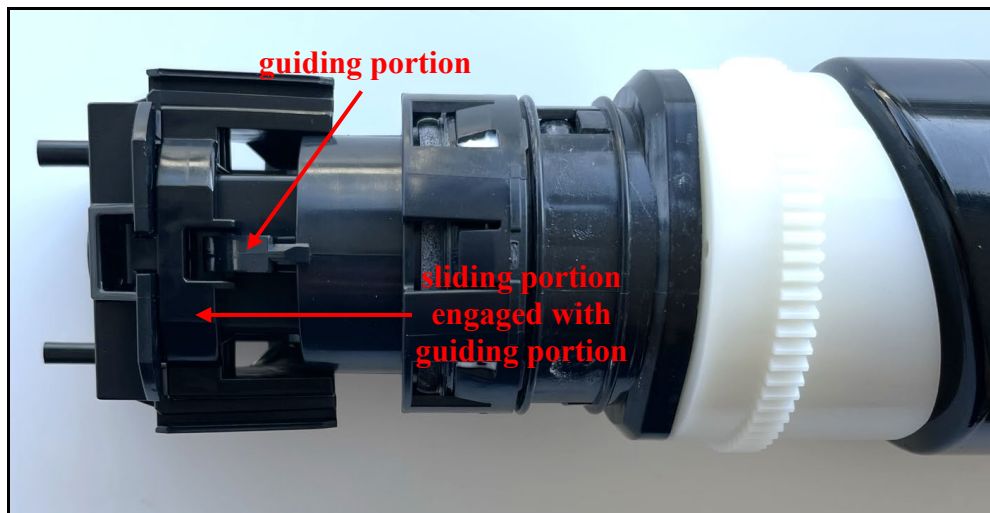


Figure 14

33. The sliding portion is slidable, while being guided by the guiding portion, relative to the developer discharging portion between a first position (shown in Figures 15A and 16A below) and a second position (shown in Figures 15B and 16B below).

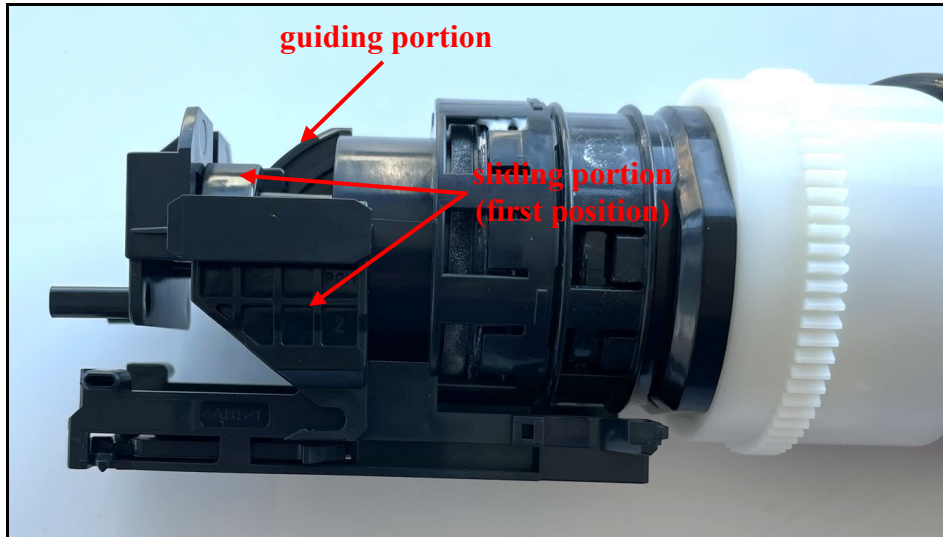


Figure 15A

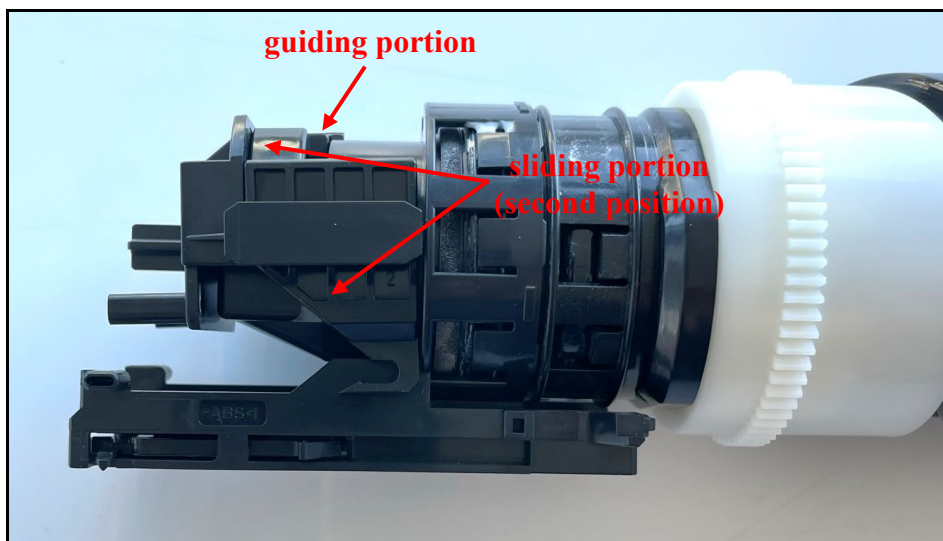


Figure 15B

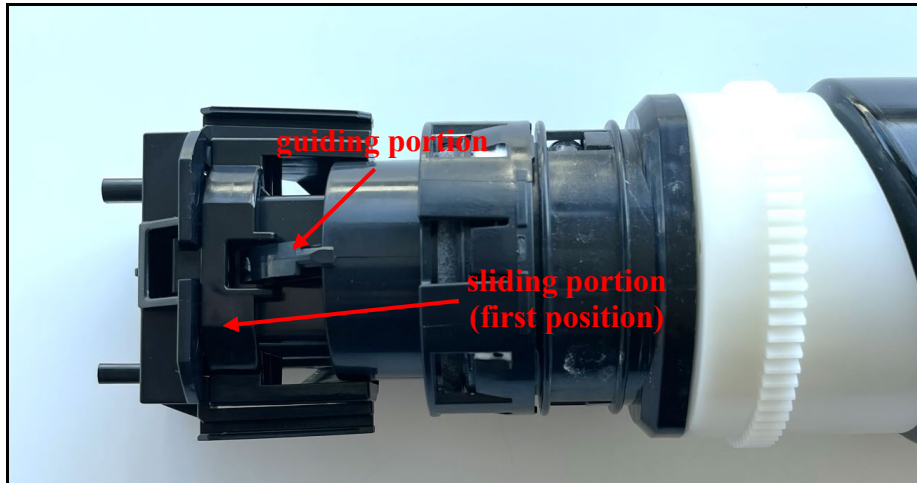


Figure 16A

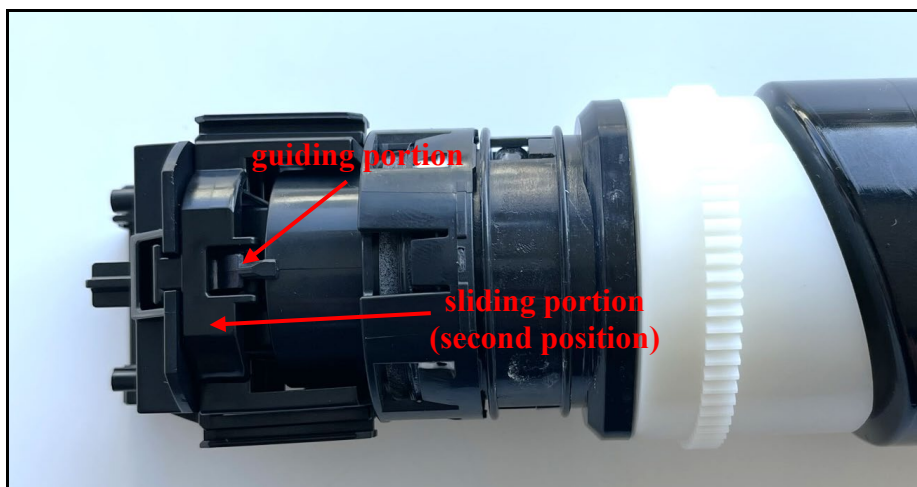


Figure 16B

34. As shown in Figure 17 below, the hook is closer to the horizontal plane when the sliding portion is at the second position (right image) than the hook is to the horizontal plane when the sliding portion is at the first position (left image).

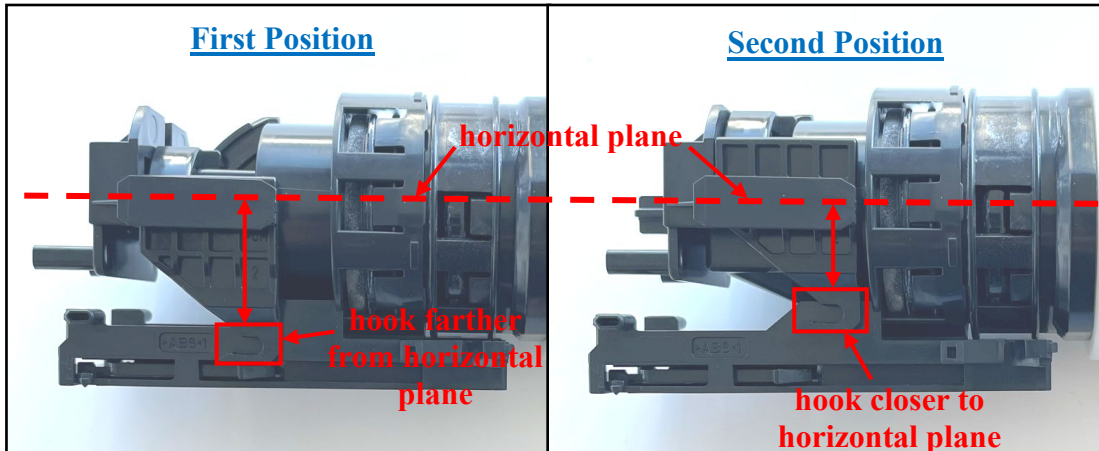


Figure 17

35. As shown in Figure 18 below, the hook is closer to the developer accommodating portion in a direction of the rotational axis when the sliding portion is at the second position (top image) than the hook is to the developer accommodating portion in the direction of the rotational axis when the sliding portion is at the first position (bottom image).

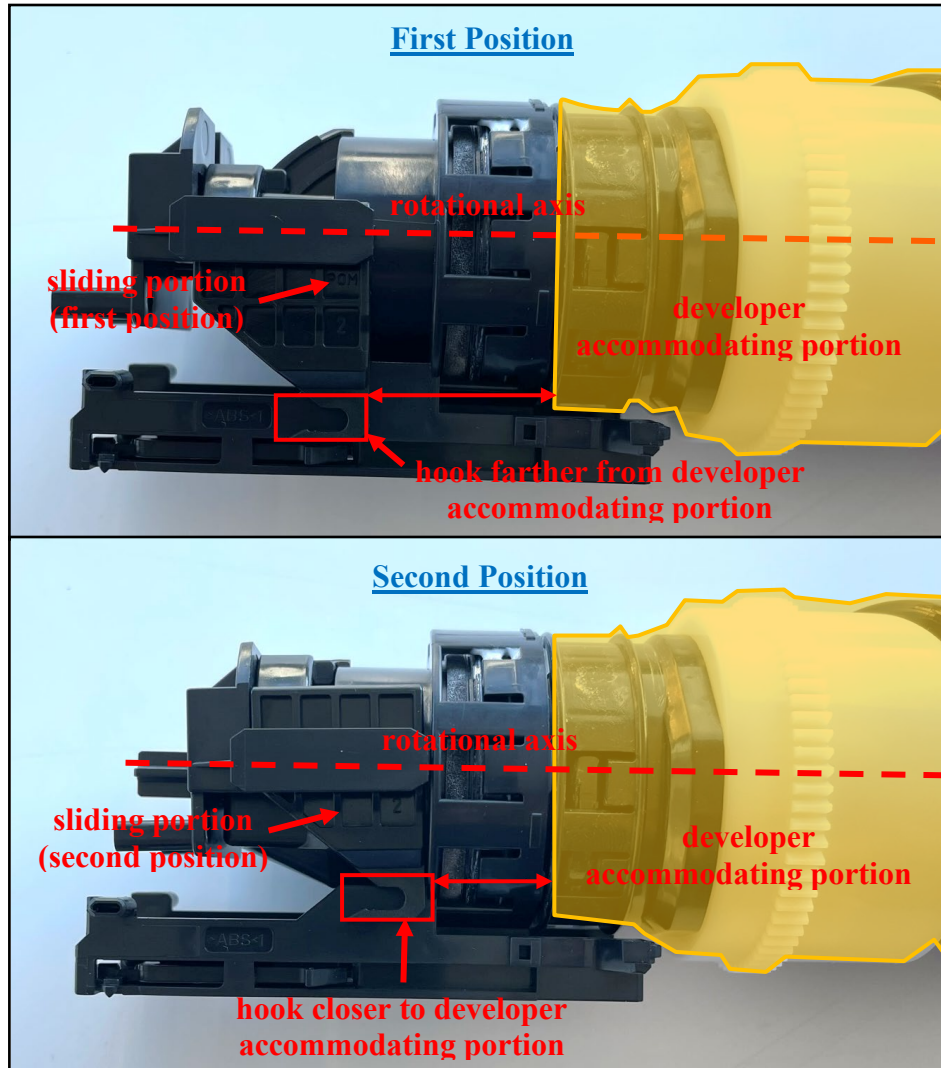


Figure 18

36. As shown in Figures 19-21 below, the representative Accused Product includes an arm portion including an arm extending from a part of the arm portion in a direction away from the developer discharging portion.

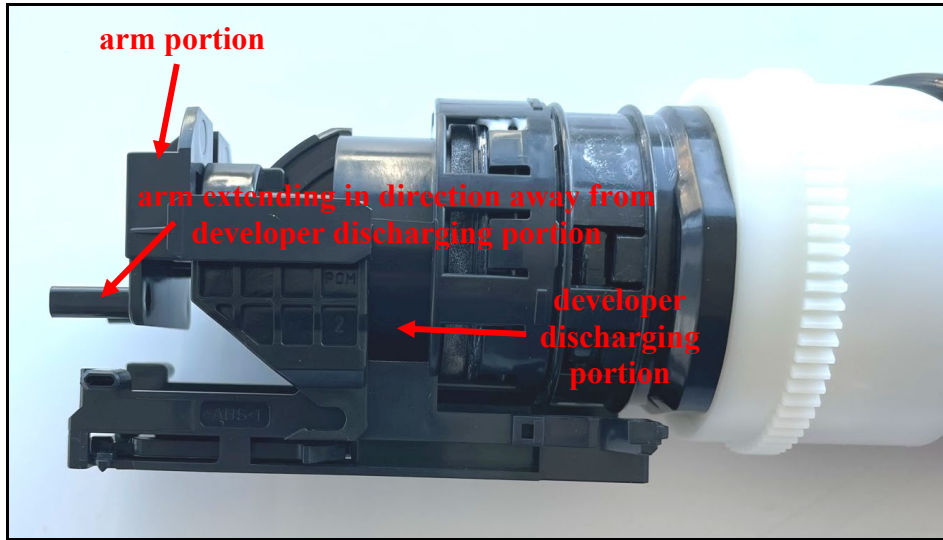


Figure 19

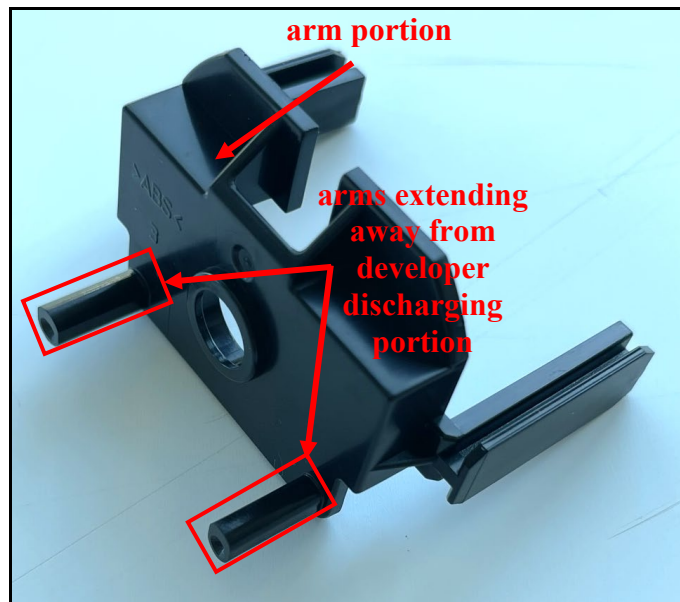


Figure 20

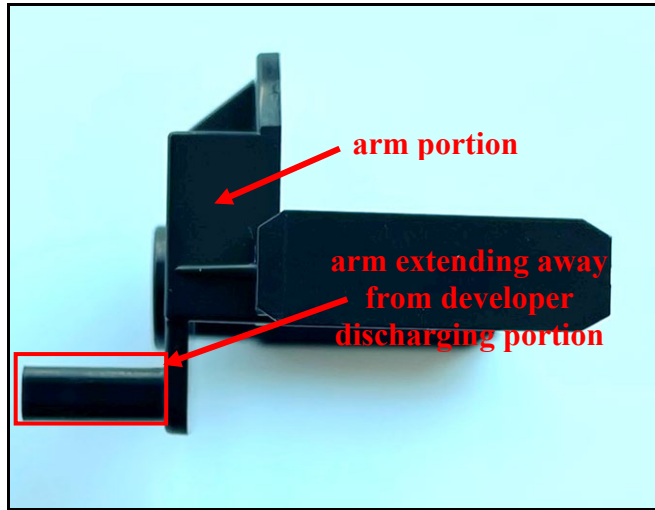


Figure 21

37. As shown in Figures 22 and 23 below, the arm is configured to receive a force from outside of the developer supply container.

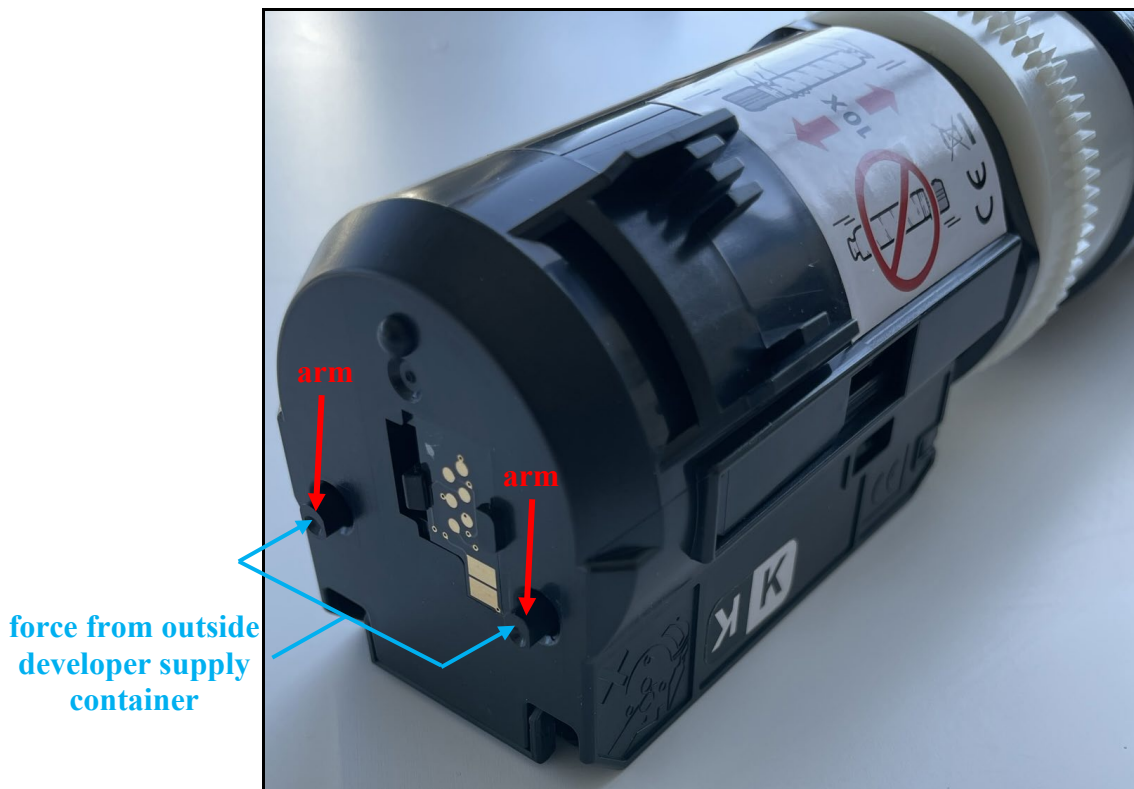


Figure 22



Figure 23

38. The arm portion is configured to be movable in the direction of the rotational axis toward the developer accommodating portion so as to cause the sliding portion to slide from the first position (shown in Figures 24A and 25A below) to the second position (shown in Figures 24B and 25B below) as the sliding portion is guided by the guiding portion.

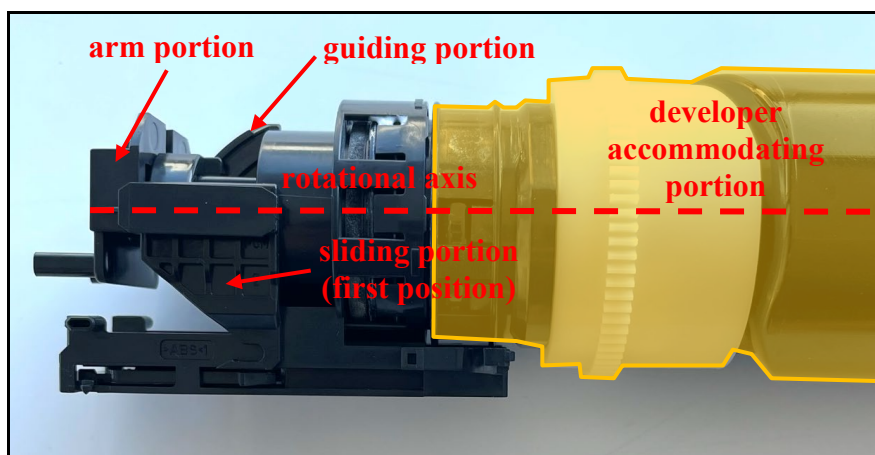


Figure 24A

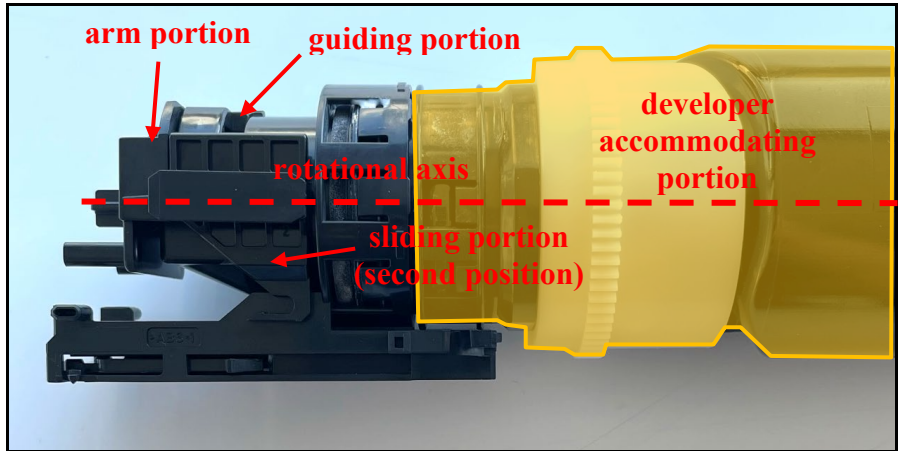


Figure 24B

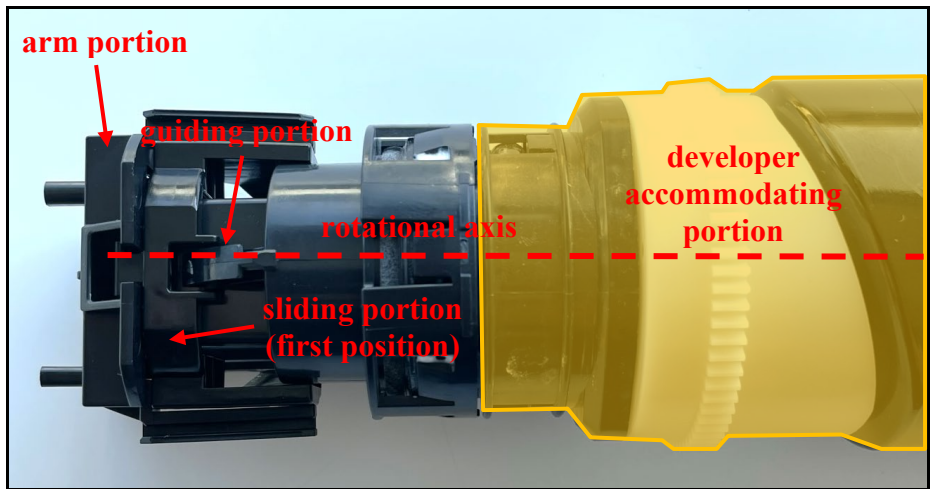


Figure 25A

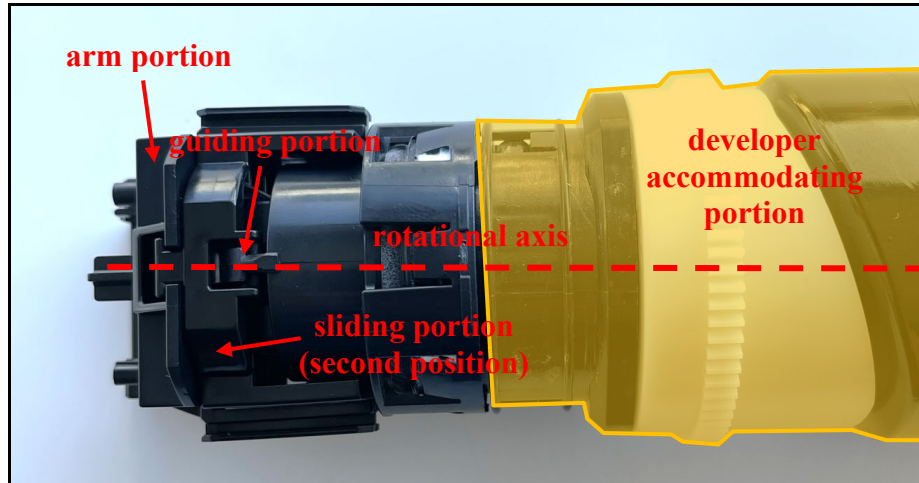


Figure 25B

39. Infringed independent claim 14 of the '056 patent recites:

A developer supply container comprising:

a developer accommodating portion accommodating developer;

a developer discharging portion in fluid communication with the developer accommodating portion, with the developer accommodating portion being rotatable about a rotational axis and relative to the developer discharging portion, and with the developer discharging portion being provided with a developer discharge opening configured to permit discharging of the developer to outside of the developer supply container;

a sliding portion including a hook, the hook being provided such that, when the developer supply container is oriented with the developer discharge opening positioned at a bottom side of the developer discharging portion, the hook is positioned below a horizontal plane that includes the rotational axis, the sliding portion being slidable relative to the developer discharging portion between a first position and a second position, with the hook being closer to the horizontal plane when the sliding portion is at the second position than the hook is to the horizontal plane when the sliding portion is at the first position, and with the hook being closer to the developer accommodating portion in a direction of the

rotational axis when the sliding portion is at the second position than the hook is to the developer accommodating portion in the direction of the rotational axis when the sliding portion is at the first position; and

an arm portion configured to be movable relative to the developer discharging portion in the direction of the rotational axis, the arm portion including an arm extending from a part of the arm portion in a direction away from the developer discharging portion, the arm being configured to receive a force for moving the arm portion in a direction toward the developer accommodating portion,

wherein the arm portion is configured to transmit the force to the sliding portion to thereby move the sliding portion.

40. As shown in Figures 1 and 2 above, the representative Accused Product is a developer (toner) supply container.

41. As shown in Figure 3 above, the representative Accused Product includes a developer accommodating portion that accommodates developer (toner).

42. As shown in Figure 4 above, the representative Accused Product includes a developer discharging portion in fluid communication with the developer accommodating portion.

43. As shown in Figure 5 above, the developer accommodating portion is rotatable about a rotational axis and relative to the developer discharging portion.

44. As shown in Figure 6 above, the developer discharging portion is provided with a developer discharge opening configured to permit discharging of the developer to outside of the developer supply container.

45. As shown in Figure 7 above, the representative Accused Product includes a sliding portion including a hook.

46. As shown in Figures 8-11 above, the hook is provided such that, when the developer supply container is oriented with the developer discharge opening positioned at a bottom side of the developer discharging portion, the hook is positioned below a horizontal plane that includes the rotational axis. This is true whether the hook is positioned as shown in Figure 10, as shown in Figure 11, or anywhere in between.

47. The sliding portion is slidable relative to the developer discharging portion between a first position (shown in Figures 26A and 27A below) and a second position (shown in Figures 26B and 27B below).

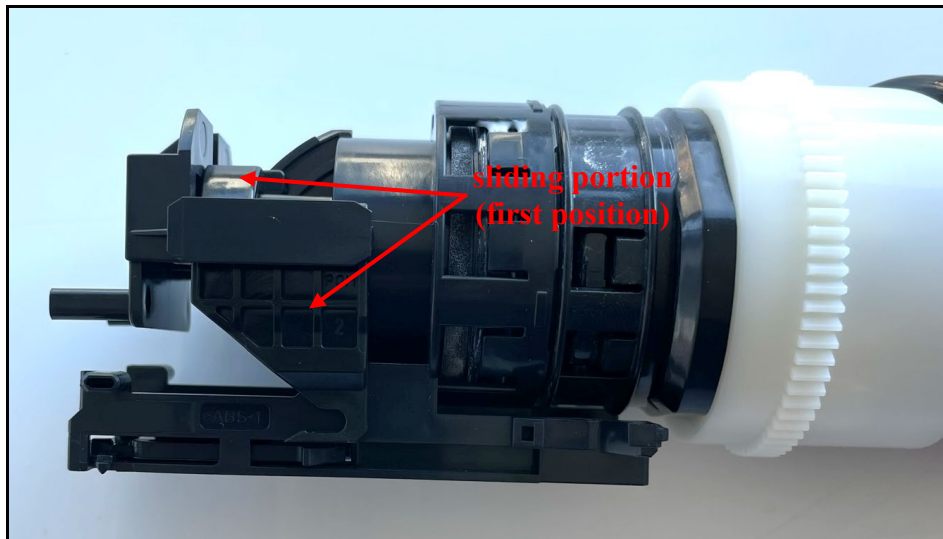


Figure 26A

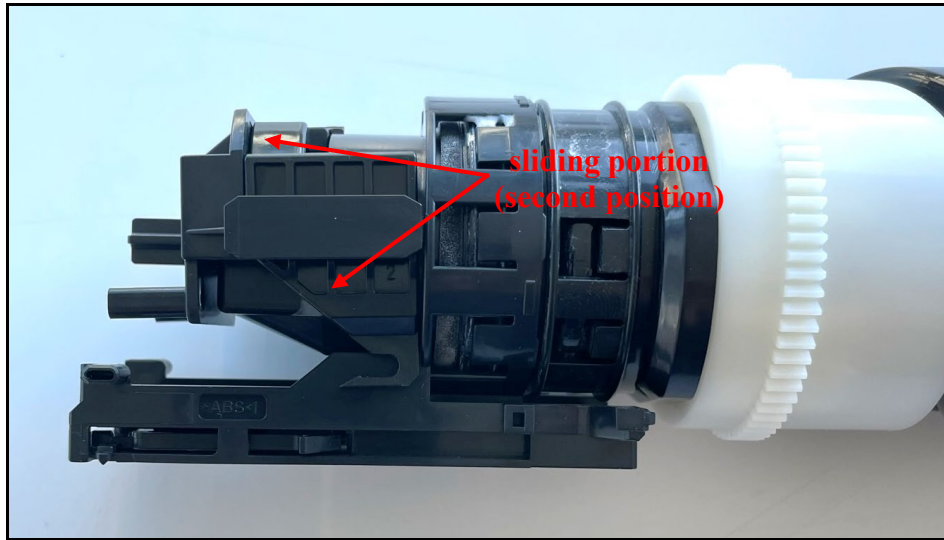


Figure 26B

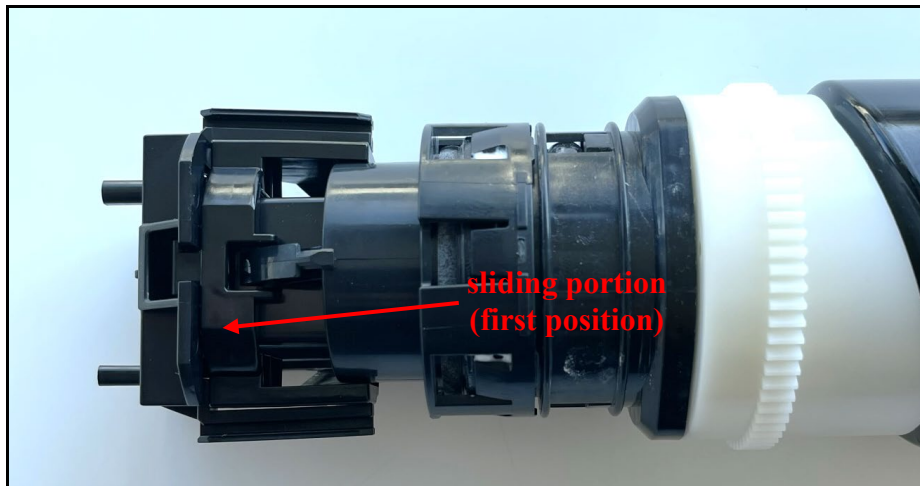


Figure 27A

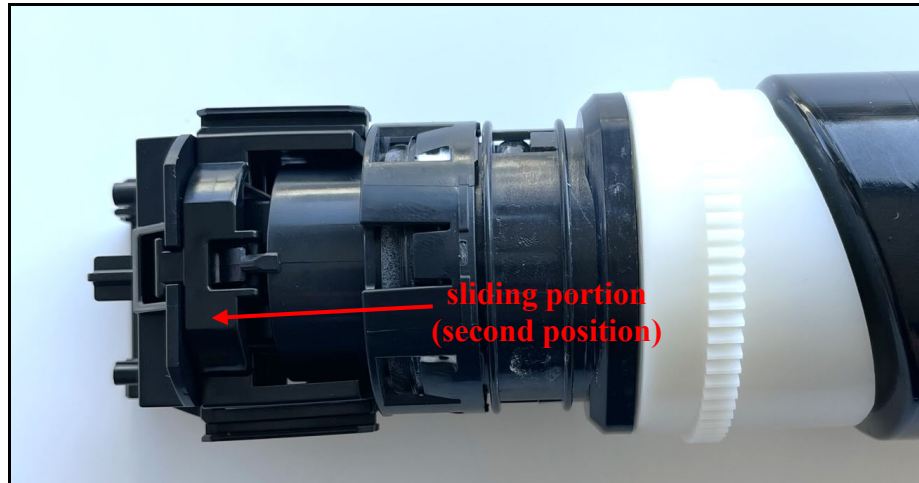


Figure 27B

48. As shown in Figure 17 above, the hook is closer to the horizontal plane when the sliding portion is at the second position (right image) than the hook is to the horizontal plane when the sliding portion is at the first position (left image).

49. As shown in Figure 18 above, the hook is closer to the developer accommodating portion in a direction of the rotational axis when the sliding portion is at the second position (bottom image) than the hook is to the developer accommodating portion in the direction of the rotational axis when the sliding portion is at the first position (top image).

50. As shown in Figures 19-21 above, the representative Accused Product includes an arm portion including an arm extending from a part of the arm portion in a direction away from the developer discharging portion.

51. The arm portion is configured to be movable relative to the developer discharging portion in the direction of the rotational axis. In Figures 28A and 29A

below, the arm portion is farther left relative to the developer discharging portion than it is in Figures 28B and 29B below.

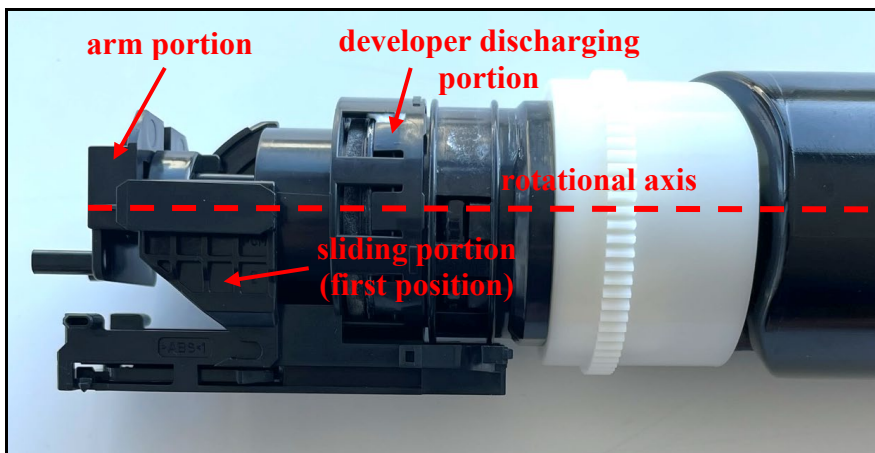


Figure 28A

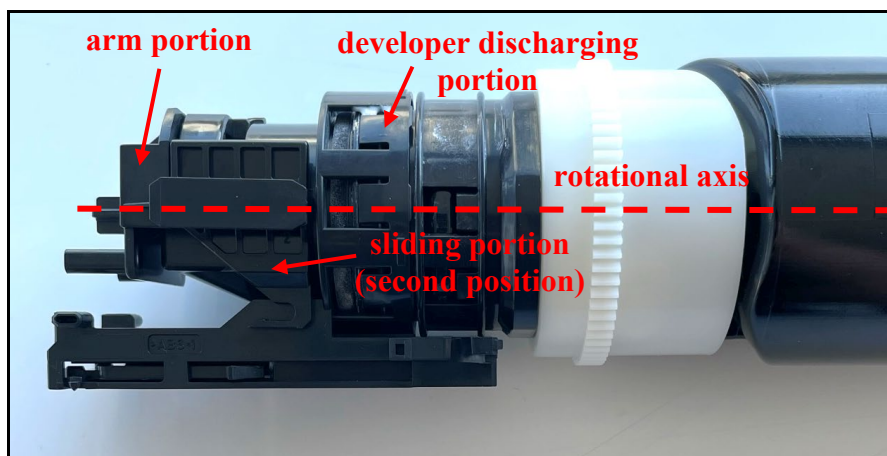


Figure 28B

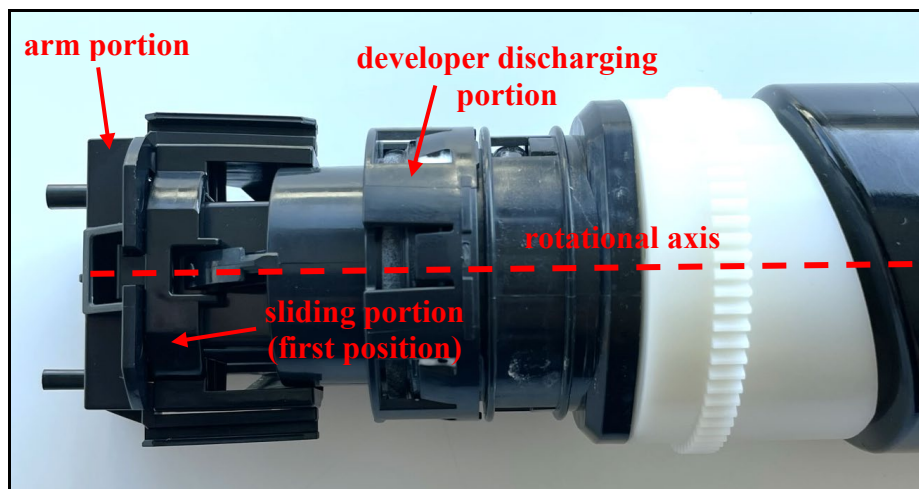


Figure 29A

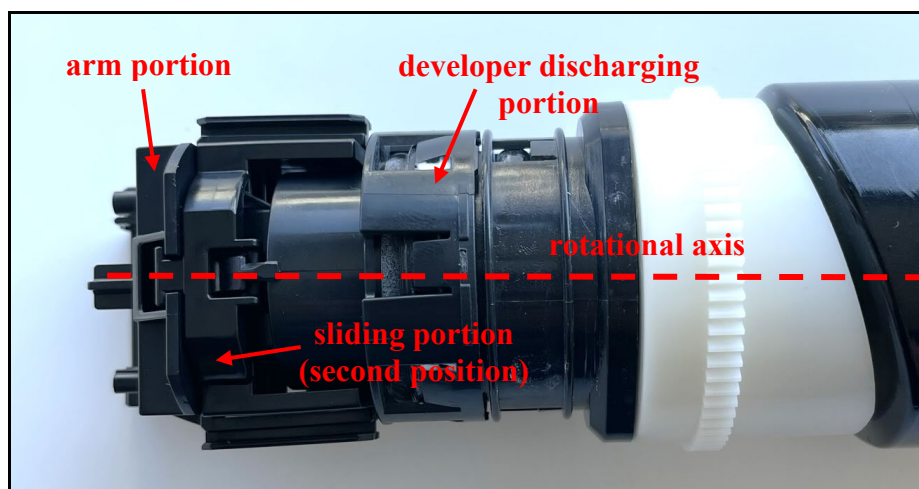


Figure 29B

52. As shown in Figures 30 and 31 below, the arm is configured to receive a force for moving the arm portion in a direction toward the developer accommodating portion.

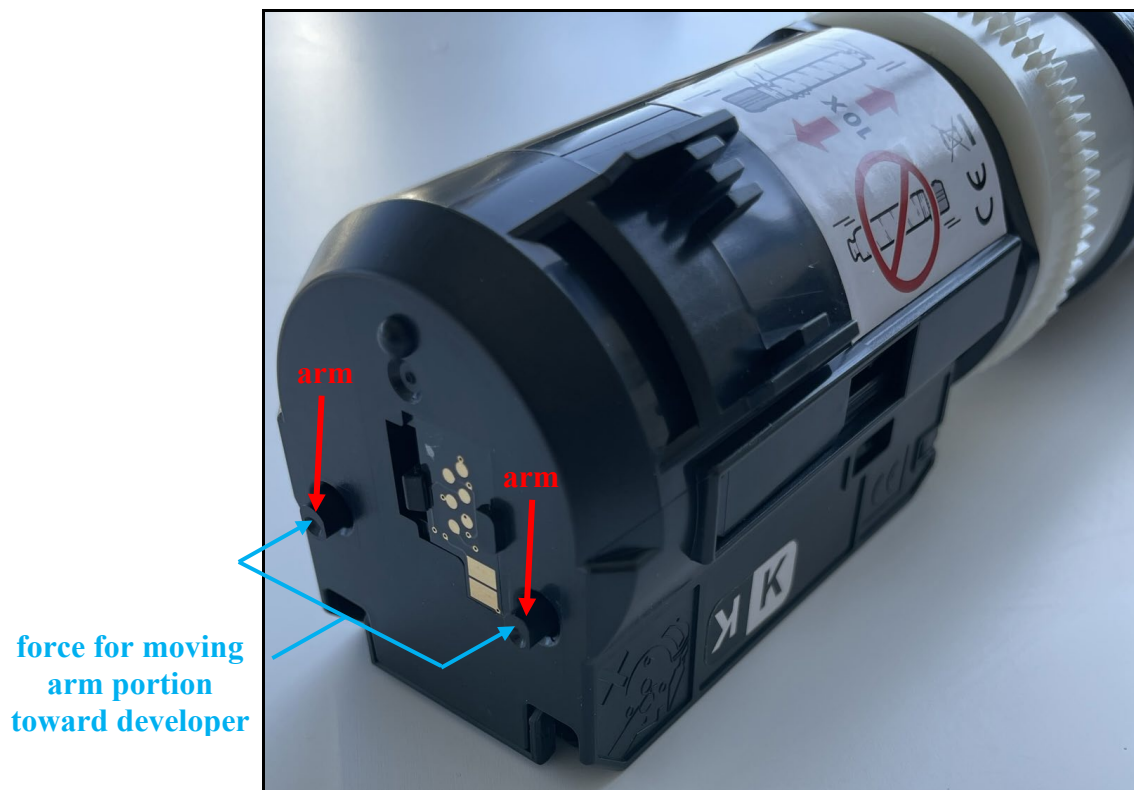


Figure 30



Figure 31

53. The arm portion is configured to transmit the force to the sliding portion to thereby move the sliding portion. Figures 28A and 29A above show the sliding portion

in the first position, before the arm portion has transmitted the force to the sliding portion. Figures 28B and 29B above show the sliding portion in the second position, after the arm portion has transmitted the force to the sliding portion.

54. Infringed independent claim 27 of the '056 patent recites:

A developer supply container comprising:

a developer accommodating portion accommodating developer;

a developer discharging portion in fluid communication with the developer accommodating portion, with the developer accommodating portion being rotatable about a rotational axis and relative to the developer discharging portion, and with the developer discharging portion being provided with a developer discharge opening configured to permit discharging of the developer to outside of the developer supply container;

a sliding portion including a hook, the hook being provided such that, when the developer supply container is oriented with the developer discharge opening positioned at a bottom side of the developer discharging portion, the hook is positioned below a horizontal plane that includes the rotational axis, the sliding portion being slidable relative to the developer discharging portion between a first position and a second position, with the hook being closer to the horizontal plane when the sliding portion is at the second position than the hook is to the horizontal plane when the sliding portion is at the first position, and with the hook being closer to the developer accommodating portion in a direction of the rotational axis when the sliding portion is at the second position than the hook is to the developer accommodating portion in the direction of the rotational axis when the sliding portion is at the first position;

an arm portion including an arm extending from a part of the arm portion in a direction away from the developer discharging portion, the arm being configured to receive a force from outside of the developer supply container;

a cover configured to cover the developer discharging portion and including a front wall that crosses the rotational axis; and

a coil spring provided between a part of the arm portion and a part of the developer discharging portion, the coil spring being configured to urge the arm portion to an inside surface of the front wall,

wherein the arm portion is configured to be movable in the direction of the rotational axis so as to cause the sliding portion to slide from the first position to the second position as the arm portion moves toward the developer accommodating portion against an urging force of the coil spring.

55. As shown in Figures 1 and 2 above, the representative Accused Product is a developer (toner) supply container.

56. As shown in Figure 3 above, the representative Accused Product includes a developer accommodating portion that accommodates developer (toner).

57. As shown in Figure 4 above, the representative Accused Product includes a developer discharging portion in fluid communication with the developer accommodating portion.

58. As shown in Figure 5 above, the developer accommodating portion is rotatable about a rotational axis and relative to the developer discharging portion.

59. As shown in Figure 6 above, the developer discharging portion is provided with a developer discharge opening configured to permit discharging of the developer to outside of the developer supply container.

60. As shown in Figure 7 above, the representative Accused Product includes a sliding portion including a hook.

61. As shown in Figures 8-11 above, the hook is provided such that, when the developer supply container is oriented with the developer discharge opening positioned at a bottom side of the developer discharging portion, the hook is positioned below a horizontal plane that includes the rotational axis. This is true whether the hook is positioned as shown in Figure 10, as shown in Figure 11, or anywhere in between.

62. The sliding portion is slidable relative to the developer discharging portion between a first position (shown in Figures 26A and 27A above) and a second position (shown in Figures 26B and 27B above).

63. As shown in Figure 17 above, the hook is closer to the horizontal plane when the sliding portion is at the second position (right image) than the hook is to the horizontal plane when the sliding portion is at the first position (left image).

64. As shown in Figure 18 above, the hook is closer to the developer accommodating portion in a direction of the rotational axis when the sliding portion is at the second position (bottom image) than the hook is to the developer accommodating portion in the direction of the rotational axis when the sliding portion is at the first position (top image).

65. As shown in Figures 19-21 above, the representative Accused Product includes an arm portion including an arm extending from a part of the arm portion in a direction away from the developer discharging portion.

66. As shown in Figures 22 and 23 above, the arm is configured to receive a force from outside of the developer supply container.

67. As shown in Figures 32 and 33 below, the representative Accused Product includes a cover configured to cover the developer discharging portion.

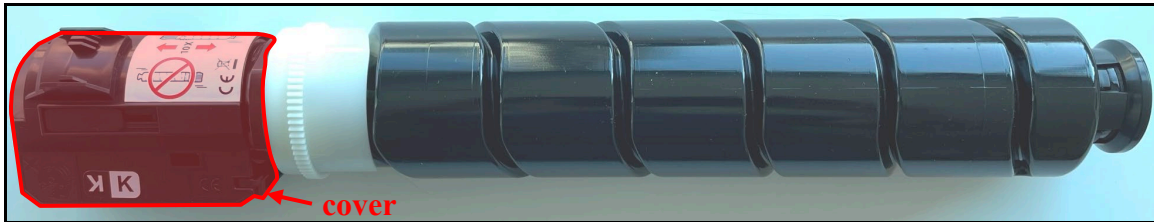


Figure 32

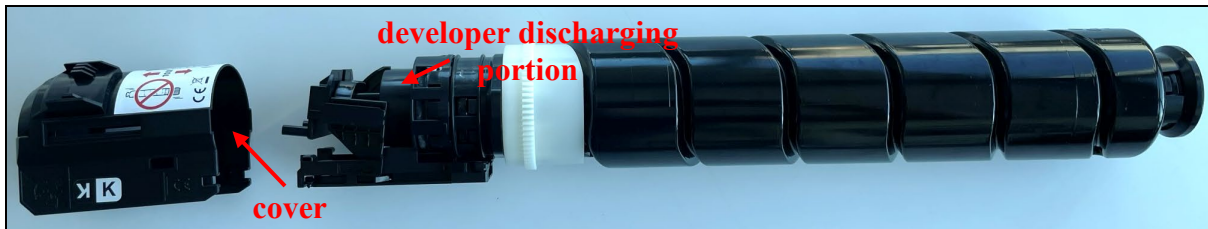


Figure 33

68. As shown in Figures 34 and 35 below, the cover includes a front wall that crosses the rotational axis.

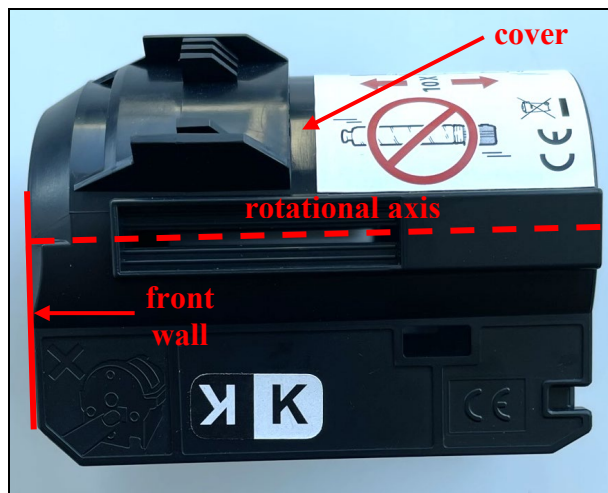


Figure 34

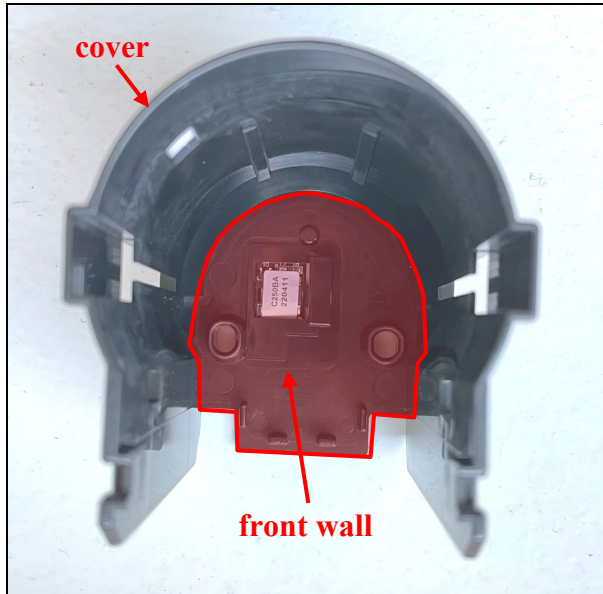


Figure 35

69. As shown in Figures 36 and 37 below, the representative Accused Product includes a coil spring provided between a part of the arm portion and a part of the developer discharging portion.

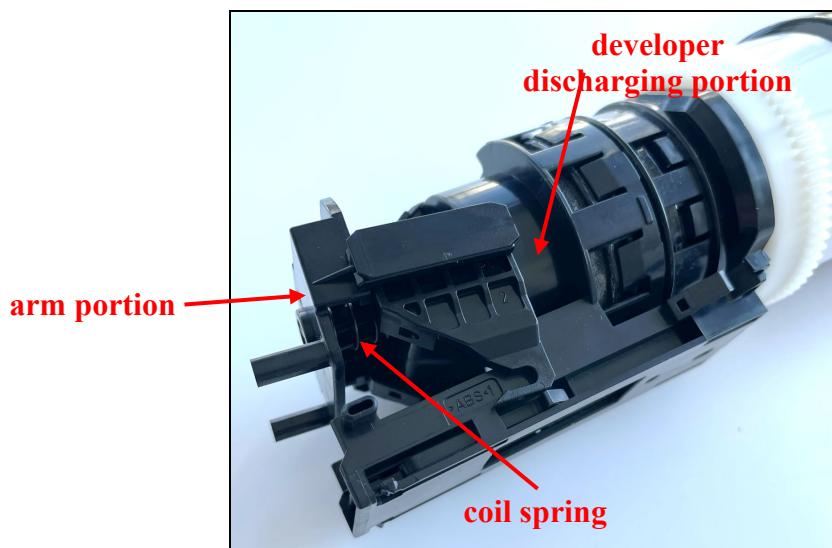


Figure 36

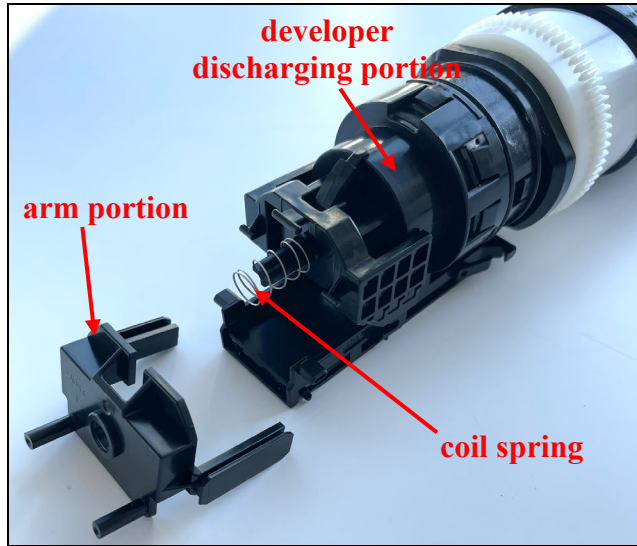


Figure 37

70. As shown in Figures 38, 39, and 40 below, the coil spring is configured to urge the arm portion to an inside surface of the front wall.

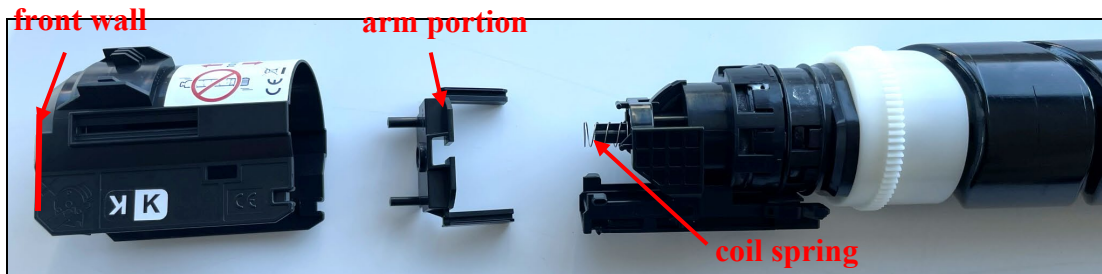


Figure 38

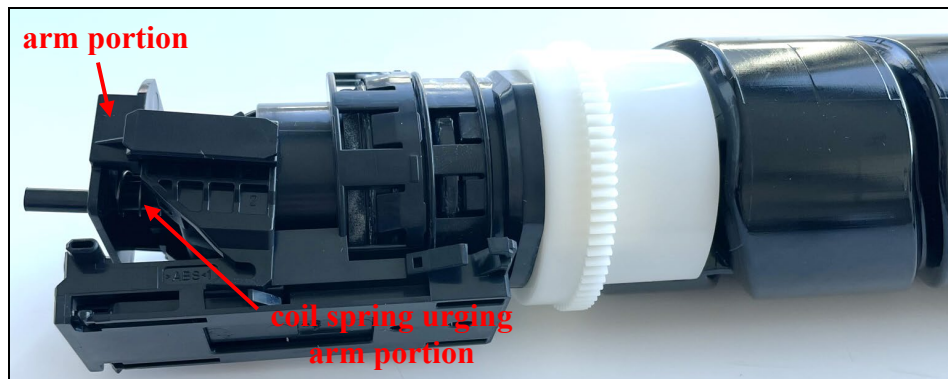
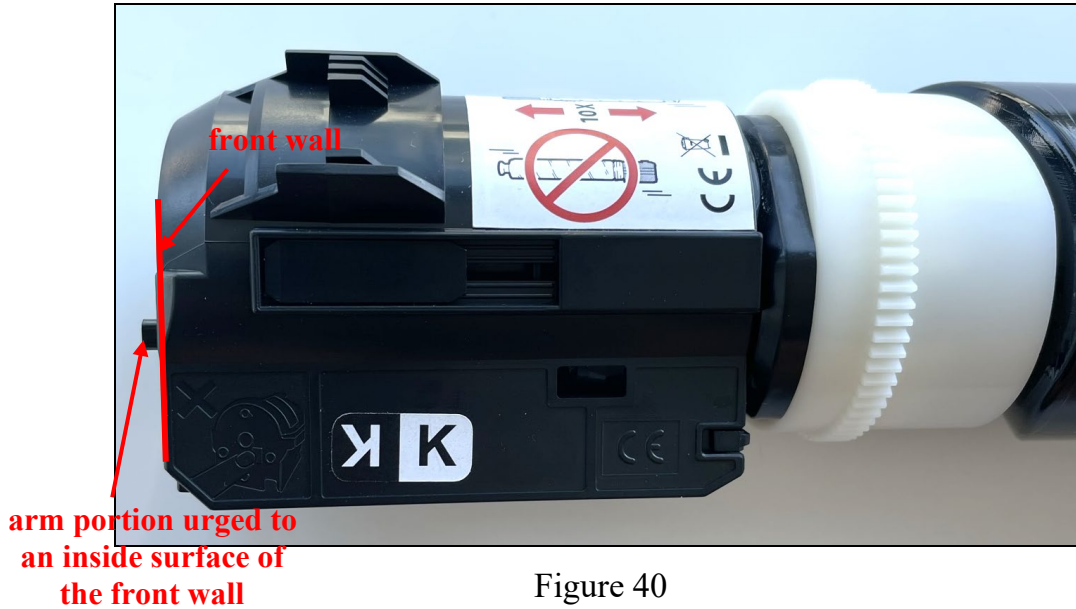
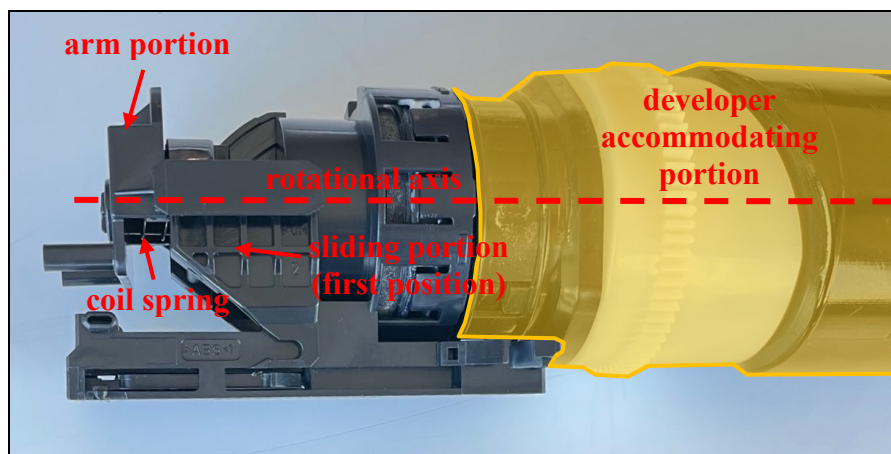


Figure 39



71. The arm portion is configured to be movable in the direction of the rotational axis so as to cause the sliding portion to slide from the first position (shown in Figures 41A and 42A below) to the second position (shown in Figures 41B and 42B below) as the arm portion moves toward the developer accommodating portion against an urging force of the coil spring (shown in Figures 41C and 42C below).



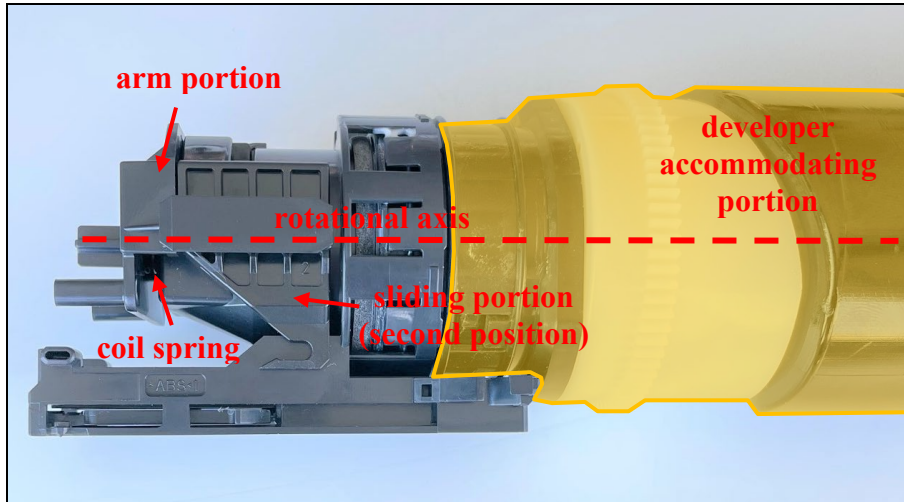


Figure 41B

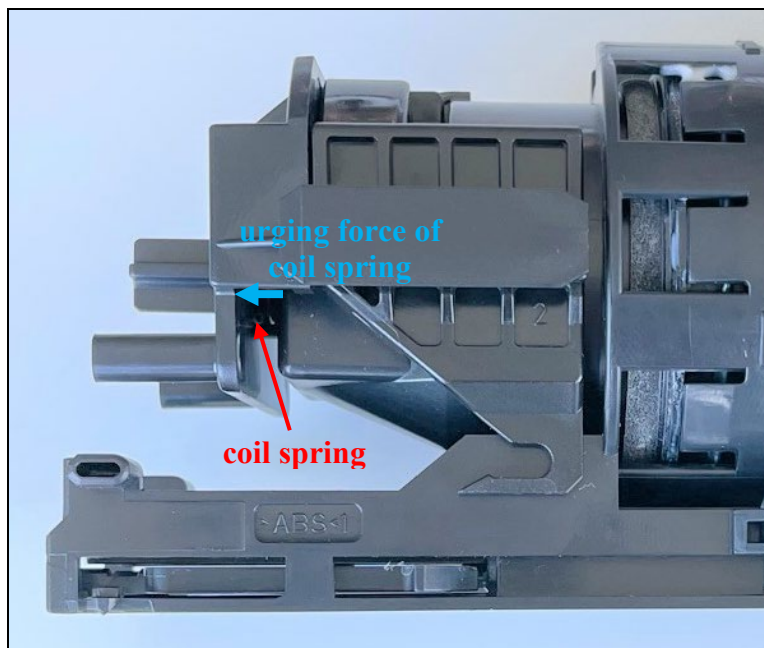


Figure 41C

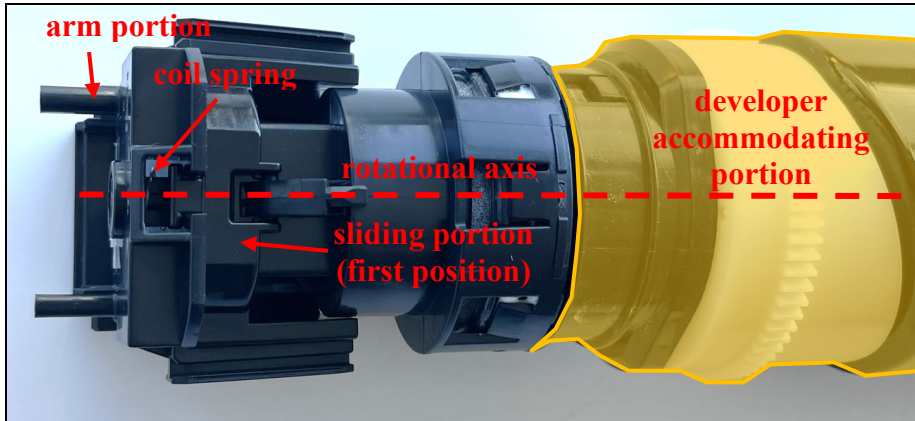


Figure 42A

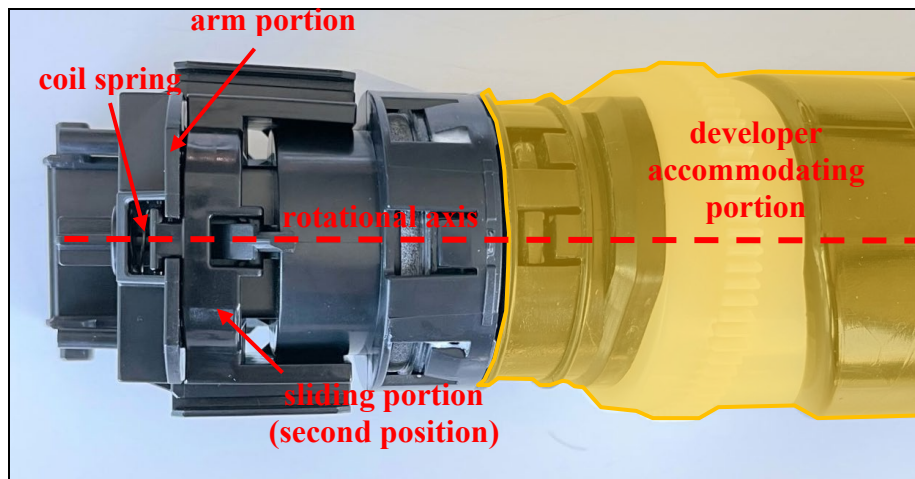


Figure 42B

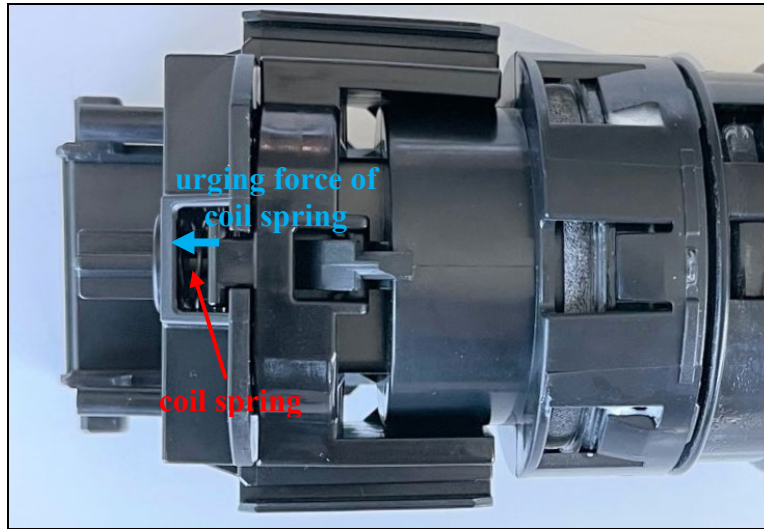


Figure 42C

72. Defendants' acts complained of herein are damaging and will continue to cause irreparable injury and damage to Canon for which there is no adequate remedy at law. Canon is therefore entitled to preliminary and permanent injunctions restraining and enjoining Defendants from infringing the '056 patent.

73. By reason of Defendants' infringing activities, Canon has suffered, and will continue to suffer, substantial damages in an amount to be determined at trial.

74. Defendants' infringement of the '056 patent has been and continues to be willful, wanton, and deliberate.

Prayer for Relief

WHEREFORE, Canon prays for judgment and relief as follows:

- A. That Defendants be found to have infringed the '056 patent;
- B. That Defendants and their subsidiaries, affiliates, officers, directors, agents, servants, employees, successors, and assigns, and all other persons and organizations in

active concert or participation with them, be preliminarily and permanently enjoined from further acts of infringement of the '056 patent pursuant to 35 U.S.C. § 283;

C. That Defendants be ordered to pay damages adequate to compensate Canon for Defendants' infringement of the '056 patent, as well as enhanced damages for Defendants' willful, wanton, and deliberate infringement, together with interest, pursuant to 35 U.S.C. § 284;

D. That this case be declared exceptional and Canon be awarded its attorney fees pursuant to 35 U.S.C. § 285;

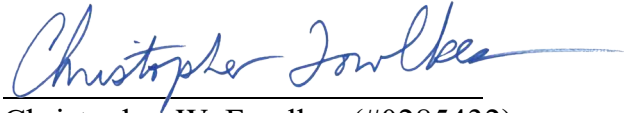
E. That Defendants be ordered to pay all of Canon's costs associated with this action; and

F. That Canon be granted such other and additional relief as the Court deems equitable, just, and proper.

Jury Demand

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Canon demands a jury trial on all issues so triable.

Dated: August 22, 2022



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