

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Cedar Lane Technologies Inc.,

Plaintiff,

v.

BELL-MARK CORPORATION,

Defendant.

Case No.

Patent Case

Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

1. Plaintiff Cedar Lane Technologies Inc. (“Plaintiff”), through its attorneys, complains of BELL-MARK CORPORATION (“Defendant”), and alleges the following:

PARTIES

2. Plaintiff Cedar Lane Technologies Inc. is a corporation organized and existing under the laws of Canada that maintains its principal place of business at 560 Baker Street, Suite 1, Nelson, BC V1L 4H9.

3. Defendant BELL-MARK CORPORATION is a corporation organized and existing under the laws of NJ that maintains an established place of business at 331 Changebridge Rd, Pine Brook, NJ 07058.

JURISDICTION

4. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

5. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant because it has engaged in systematic and continuous business activities in this District. As described below, Defendant has committed acts of patent infringement giving rise to this action within this District.

VENUE

7. Venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant has an established place of business in this District. In addition, Defendant has committed acts of patent infringement in this District, and Plaintiff has suffered harm in this district.

PATENTS-IN-SUIT

8. Plaintiff is the assignee of all right, title and interest in United States Patent Nos. 10,346,105; 7,383,321; 7,958,205; 8,645,500; 8,773,685; 9,448,750; and 9,983,836 (the “Patents-in-Suit”); including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the Patents-in-Suit. Accordingly, Plaintiff possesses the exclusive right and standing to prosecute the present action for infringement of the Patents-in-Suit by Defendant.

THE '105 PATENT

9. The '105 Patent is entitled “Method and system for communicating between a remote printer and a server,” and issued 2019-07-09. The application leading to the '105 Patent was filed on 2018-05-25. A true and correct copy of the '105 Patent is attached hereto as Exhibit 1 and incorporated herein by reference.

THE '321 PATENT

10. The '321 Patent is entitled “Method and system for communicating between a remote printer and a server,” and issued 2008-06-03. The application leading to the '321 Patent was filed on 2002-07-09. A true and correct copy of the '321 Patent is attached hereto as Exhibit 2 and incorporated herein by reference.

THE '205 PATENT

11. The '205 Patent is entitled "Method and system for communicating between a remote printer and a server," and issued 2011-06-07. The application leading to the '205 Patent was filed on 2008-04-18. A true and correct copy of the '205 Patent is attached hereto as Exhibit 3 and incorporated herein by reference.

THE '500 PATENT

12. The '500 Patent is entitled "Method and system for communicating between a remote printer and a server," and issued 2014-02-04. The application leading to the '500 Patent was filed on 2011-04-14. A true and correct copy of the '500 Patent is attached hereto as Exhibit 4 and incorporated herein by reference.

THE '685 PATENT

13. The '685 Patent is entitled "High-speed digital image printing system," and issued 2014-07-08. The application leading to the '685 Patent was filed on 2003-07-01. A true and correct copy of the '685 Patent is attached hereto as Exhibit 5 and incorporated herein by reference.

THE '750 PATENT

14. The '750 Patent is entitled "Method and system for communicating between a remote printer and a server," and issued 2016-09-20. The application leading to the '750 Patent was filed on 2013-12-20. A true and correct copy of the '750 Patent is attached hereto as Exhibit 6 and incorporated herein by reference.

THE '836 PATENT

15. The '836 Patent is entitled "Method and system for communicating between a remote printer and a server," and issued 2018-05-29. The application leading to the '836 Patent

was filed on 2016-09-14. A true and correct copy of the '836 Patent is attached hereto as Exhibit 7 and incorporated herein by reference.

COUNT 1: INFRINGEMENT OF THE '105 PATENT

16. Plaintiff incorporates the above paragraphs herein by reference.

17. **Direct Infringement.** Defendant directly infringed one or more claims of the '105 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringed at least the exemplary method claims of the '105 Patent also identified in the charts incorporated into this Count below (the "Exemplary '105 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringed the claims of the '105 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

18. Defendant also directly infringed, literally or under the doctrine of equivalents, the Exemplary '105 Patent Claims, by having its employees internally test and use these Exemplary Products.

19. Exhibit 8 includes charts comparing the Exemplary '105 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '105 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '105 Patent Claims.

20. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 8.

21. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

COUNT 2: INFRINGEMENT OF THE '321 PATENT

22. Plaintiff incorporates the above paragraphs herein by reference.

23. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '321 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '321 Patent also identified in the charts incorporated into this Count below (the "Exemplary '321 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '321 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

24. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary '321 Patent Claims, by having its employees internally test and use these Exemplary Products.

25. **Actual Knowledge of Infringement.** The service of this Complaint, in conjunction with the attached claim charts and references cited, constitutes actual knowledge of infringement as alleged here.

26. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer for sale, market, and/or import into the United States, products that infringe the '321 Patent. On information and belief, Defendant has also continued to sell the Exemplary Defendant Products and distribute product literature and website materials inducing end users and others to use its products in the customary and intended manner that infringes the '321 Patent. See Exhibit 9

(extensively referencing these materials to demonstrate how they direct end users to commit patent infringement).

27. **Induced Infringement.** At least since being served by this Complaint and corresponding claim charts, Defendant has actively, knowingly, and intentionally continued to induce infringement of the '321 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to their customers for use in end-user products in a manner that infringes one or more claims of the '321 Patent.

28. Exhibit 9 includes charts comparing the Exemplary '321 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '321 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '321 Patent Claims.

29. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 9.

30. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

COUNT 3: INFRINGEMENT OF THE '205 PATENT

31. Plaintiff incorporates the above paragraphs herein by reference.

32. **Direct Infringement.** Defendant directly infringed one or more claims of the '205 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringed at least the exemplary method claims of the '205 Patent also identified in the charts incorporated into this Count below (the "Exemplary '205 Patent Claims") literally or by the doctrine of equivalents. On information

and belief, numerous other devices that infringed the claims of the '205 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

33. Defendant also directly infringed, literally or under the doctrine of equivalents, the Exemplary '205 Patent Claims, by having its employees internally test and use these Exemplary Products.

34. Exhibit 10 includes charts comparing the Exemplary '205 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '205 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '205 Patent Claims.

35. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 10.

36. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

COUNT 4: INFRINGEMENT OF THE '500 PATENT

37. Plaintiff incorporates the above paragraphs herein by reference.

38. **Direct Infringement.** Defendant directly infringed one or more claims of the '500 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringed at least the exemplary method claims of the '500 Patent also identified in the charts incorporated into this Count below (the "Exemplary '500 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringed the claims of the '500 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

39. Defendant also directly infringed, literally or under the doctrine of equivalents, the Exemplary '500 Patent Claims, by having its employees internally test and use these Exemplary Products.

40. Exhibit 11 includes charts comparing the Exemplary '500 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '500 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '500 Patent Claims.

41. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 11.

42. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

COUNT 5: INFRINGEMENT OF THE '685 PATENT

43. Plaintiff incorporates the above paragraphs herein by reference.

44. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '685 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '685 Patent also identified in the charts incorporated into this Count below (the "Exemplary '685 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '685 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

45. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary '685 Patent Claims, by having its employees internally test and use these Exemplary Products.

46. **Actual Knowledge of Infringement.** The service of this Complaint, in conjunction with the attached claim charts and references cited, constitutes actual knowledge of infringement as alleged here.

47. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer for sale, market, and/or import into the United States, products that infringe the '685 Patent. On information and belief, Defendant has also continued to sell the Exemplary Defendant Products and distribute product literature and website materials inducing end users and others to use its products in the customary and intended manner that infringes the '685 Patent. See Exhibit 12 (extensively referencing these materials to demonstrate how they direct end users to commit patent infringement).

48. **Induced Infringement.** At least since being served by this Complaint and corresponding claim charts, Defendant has actively, knowingly, and intentionally continued to induce infringement of the '685 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to their customers for use in end-user products in a manner that infringes one or more claims of the '685 Patent.

49. Exhibit 12 includes charts comparing the Exemplary '685 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '685 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '685 Patent Claims.

50. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 12.

51. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

COUNT 6: INFRINGEMENT OF THE '750 PATENT

52. Plaintiff incorporates the above paragraphs herein by reference.

53. **Direct Infringement.** Defendant directly infringed one or more claims of the '750 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringed at least the exemplary method claims of the '750 Patent also identified in the charts incorporated into this Count below (the "Exemplary '750 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringed the claims of the '750 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

54. Defendant also directly infringed, literally or under the doctrine of equivalents, the Exemplary '750 Patent Claims, by having its employees internally test and use these Exemplary Products.

55. Exhibit 13 includes charts comparing the Exemplary '750 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '750 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '750 Patent Claims.

56. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 13.

57. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

COUNT 7: INFRINGEMENT OF THE '836 PATENT

58. Plaintiff incorporates the above paragraphs herein by reference.

59. **Direct Infringement.** Defendant directly infringed one or more claims of the '836 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringed at least the exemplary method claims of the '836 Patent also identified in the charts incorporated into this Count below (the "Exemplary '836 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringed the claims of the '836 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

60. Defendant also directly infringed, literally or under the doctrine of equivalents, the Exemplary '836 Patent Claims, by having its employees internally test and use these Exemplary Products.

61. Exhibit 14 includes charts comparing the Exemplary '836 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '836 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '836 Patent Claims.

62. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 14.

63. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

JURY DEMAND

64. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

- A. A judgment that the '105 Patent is valid and enforceable
- B. A judgment that Defendant has infringed directly one or more claims of the '105 Patent;
- C. A judgment that the '321 Patent is valid and enforceable
- D. A judgment that Defendant has infringed directly and indirectly one or more claims of the '321 Patent;
- E. A judgment that the '205 Patent is valid and enforceable
- F. A judgment that Defendant has infringed directly one or more claims of the '205 Patent;
- G. A judgment that the '500 Patent is valid and enforceable
- H. A judgment that Defendant has infringed directly one or more claims of the '500 Patent;
- I. A judgment that the '685 Patent is valid and enforceable
- J. A judgment that Defendant has infringed directly and indirectly one or more claims of the '685 Patent;
- K. A judgment that the '750 Patent is valid and enforceable
- L. A judgment that Defendant has infringed directly one or more claims of the '750 Patent;

- M. A judgment that the '836 Patent is valid and enforceable
- N. A judgment that Defendant has infringed directly one or more claims of the '836 Patent;
- O. An accounting of all damages not presented at trial;
- P. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendant's continuing or future infringement, up until the date such judgment is entered with respect to the '321; and '685 Patents, including pre- or post-judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284;
- Q. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendant's past infringement at least with respect to the '105; '205; '500; '750; and '836 Patents.
- R. And, if necessary, to adequately compensate Plaintiff for Defendant's infringement, an accounting:
 - i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys fees against Defendant that it incurs in prosecuting this action;
 - ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this action; and
 - iii. that Plaintiff be awarded such further relief at law or in equity as the Court deems just and proper.

Dated: November 12, 2024

Respectfully submitted,

/s/ Antranig Garibian (DE Bar No. 4962)
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