

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CDR PRINTING LLC,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

Civil Action No.

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which CDR Printing LLC (“CDR Printing” or “Plaintiff”) makes the following allegations against Defendant Target Corporation (“Defendant”) alleging as follows:

PARTIES

1. Plaintiff CDR Printing is a Texas limited liability company, having a principal place of business at 815 Brazos St., Ste. 500, Austin, TX 78701.

2. On information and belief, Defendant Target Corporation is a corporation organized and existing under the laws of the State of Minnesota, with its principal place of business located at 1000 Nicollet Mall, Minneapolis, MN 55403. On information and belief, Target may be served via officer or director at the address above.

JURISDICTION AND VENUE

3. This action arises 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).

4. Venue is proper in this District under 28 U.S.C. §§ 1391(c) and 1400(b). On information and belief, Defendant has transacted business in this District, and has committed and/or induced acts of patent infringement in this District.

5. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this Judicial District.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 7,271,929

6. Plaintiff is the owner by assignment of United States Patent No. 7,271,929 ("the '929 Patent") titled "System and Method for Integrated Printing and Assembly of Electronic Documents." The '929 Patent issued on September 18, 2007. A true and correct copy of the '929 Patent is hereto attached as **Exhibit A**.

7. Upon information and belief, Defendant has been and is now infringing the '929 Patent in the State of Texas, in this Judicial District, and elsewhere in the United States, by, among other things, methods practiced by Defendant's website, www.target.com, for delivering a document created during a first time period including rendering codes, delivering the document at a subsequent time period, and modifying the document at the subsequent time period based on the rendering codes, tailored in part to the location of the recipient, covered by one or more claims of the '929 Patent to the injury of CDR Printing. Defendant is directly infringing, literally infringing, and/or infringing the '929 Patent under the doctrine of equivalents. Defendant is thus liable for infringement of the '929 Patent pursuant to 35 U.S.C. § 271.

8. As a result of Defendant's infringement of the '929 Patent, Plaintiff has suffered monetary damages and is entitled to a money judgment in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of CDR Printing's invention by Defendant, together with interest and costs as fixed by the Court, and Plaintiff will continue to suffer damages in the future unless Defendant's infringing activities are enjoined by this Court.

9. Unless a permanent injunction is issued enjoining Defendant and its agents, servants, employees, representatives, affiliates, and all others acting on in active concert therewith from infringing the '929 Patent, Plaintiff will be greatly and irreparably harmed.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Defendant has infringed the '929 Patent;
2. A permanent injunction enjoining Defendant and its officers, directors, agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of the '929 Patent, or such other equitable relief the Court determines is warranted;
3. A judgment and order requiring Defendant to pay to Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '929 Patent as provided under 35 U.S.C. § 284, and an accounting of ongoing post-judgment infringement; and
4. Any and all other relief, at law or equity, to which Plaintiff may show itself to be entitled.

DEMAND FOR JURY TRIAL

CDR Printing, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

DATED July 16, 2015.

Respectfully submitted,

By: /s/ Hao Ni

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