

# Fitzpatrick

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June 12, 2015

## VIA EXPRESS DELIVERY

General Plastic Industrial Co., Ltd.  
Attn: Mr. Jerry Wang, President  
50 Tzu-Chiang Road  
Wu-Chi Town, Taichung County  
Taiwan

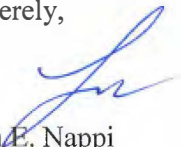
Color Imaging, Inc.  
Attn: Dr. Sueling Wang, President  
4350 Peachtree Industrial Blvd., Suite 100  
Norcross, Georgia 30071

Re: New Complaint Filed with the U.S. International Trade Commission:  
*Certain Toner Supply Containers and Components Thereof*

Dear Sirs:

Enclosed is a courtesy copy of a Complaint that Canon Inc., Canon U.S.A., Inc. and Canon Virginia, Inc. filed with the U.S. International Trade Commission on June 12, 2015, naming your company as a proposed Respondent.

Sincerely,



John E. Nappi

Enclosure

cc: John Fry (*via express delivery with enclosures*)  
Morris, Manning & Martin, LLP  
1600 Atlanta Financial Center  
3343 Peachtree Road, NE  
Atlanta, GA 30326

FCHS\_WS 11531365v1.doc

NEW YORK WASHINGTON CALIFORNIA

UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.

Before the Honorable \_\_\_\_\_

In the Matter of

**CERTAIN TONER SUPPLY CONTAINERS  
AND COMPONENTS THEREOF**

Investigation No. 337-TA-\_\_\_\_\_

**COMPLAINT OF CANON INC. ET AL.  
UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED**

**Complainants:**

**Canon Inc.**

30-2, Shimomaruko 3-chome  
Ohta-ku, Tokyo 146-8501, Japan  
Phone: 81-3-3758-2111

**Canon U.S.A., Inc.**

One Canon Park  
Melville, New York 11747  
Phone: 631-330-5000

**Canon Virginia, Inc.**

12000 Canon Boulevard  
Newport News, Virginia 23606  
Phone: 757-881-6001

**Counsel for Complainants:**

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**Proposed Respondents:**

**General Plastic Industrial Co., Ltd.**

50 Tzu-Chiang Road  
Wu-Chi Town, Taichung County  
Taiwan  
Phone: +886-4-2639-3103

**Color Imaging, Inc.**

4350 Peachtree Industrial Blvd., Suite 100  
Norcross, Georgia 30071  
Phone: 770-840-1090

*(continued on next page)*

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## TABLE OF EXHIBITS

Exhibit	Description
1	Certified Copy of U.S. Patent No. 8,909,094
2	Certified Copy of U.S. Patent No. 9,046,820 <sup>1</sup>
3	Certified Assignment Records for U.S. Patent Nos. 8,909,094 and 9,046,820
4	<b><u>Confidential Exhibit</u></b> – Confidential Declaration of John R. Briggs
5	<b><u>Confidential Exhibit</u></b> – Licensees of the Asserted Patents
6	Canon Press Release dated January 7, 2015
7	Table of Certain Canon Toner Supply Containers and Compatible Copy Machines
8	Claim Chart Applying '094 Patent, Claim 1 to Accused Toner Containers
9	Claim Chart Applying '094 Patent, Claim 11 to Accused Toner Containers
10	Claim Chart Applying '094 Patent, Claim 29 to Accused Toner Containers
11	Claim Chart Applying '094 Patent, Claim 38 to Accused Toner Containers
12	Claim Chart Applying '820 Patent, Claim 1 to Accused Toner Containers
13	Claim Chart Applying '820 Patent, Claim 16 to Accused Toner Containers
14	Claim Chart Applying '094 Patent, Claim 1 to Canon GPR-30 Toner (Black)
15	Claim Chart Applying '820 Patent, Claim 1 to Canon GPR-30 Toner (Black)
16	Photographs – Color Imaging (General Plastic) FCA2270
17	Photographs – Color Imaging (General Plastic) FCAC2030-K packaging (pictorial instructions)
18	Photographs – Canon GPR-30 Toner (Black)
19	Packing Slip – Color Imaging
20	Panjiva Reports – Shipments from General Plastic to Color Imaging
21	Records (Secretary of State) – Kings Brothers, LLC
22	Records (Secretary of State) – GPI USA, Inc.

<sup>1</sup> Canon has ordered a certified copy of U.S. Patent No. 9,046,820, and once received, will substitute it for the non-certified version submitted herewith.

<b>Exhibit</b>	<b>Description</b>
23	Color Imaging 2014 Product Catalog
24	Website Information – General Plastic (Company Profile)
25	Website Information – Color Imaging (Company Profile)
26	<i>Canon Inc. v. Color Imaging, Inc. et al.</i> , Case No. 1:11-cv-03855, DEFENDANT GENERAL PLASTIC INDUSTRIAL CO., LTD.’S AMENDED ANSWER AND COUNTERCLAIMS TO PLAINTIFF’S AMENDED COMPLAINT FOR PATENT INFRINGEMENT, D.I. 274 (N.D. Ga. July 9, 2014)
27	<i>Canon Inc. v. Color Imaging, Inc. et al.</i> , Case No. 1:11-cv-03855, DEFENDANT COLOR IMAGING, INC.’S AMENDED ANSWER AND COUNTERCLAIMS TO PLAINTIFF’S AMENDED COMPLAINT FOR PATENT INFRINGEMENT, D.I. 273 (N.D. Ga. July 9, 2014)
28	<i>Canon Inc. v. Color Imaging, Inc. et al.</i> , Case No. 1:11-cv-03855, JOINT STIPULATION BETWEEN THE PARTIES REGARDING USE OF DEFENDANTS’ ACCUSED TONER BOTTLE PRODUCTS, D.I. 208 (N.D. Ga. March 24, 2014)
29	<i>Canon Inc. v. Color Imaging, Inc. et al.</i> , Case No. 1:11-cv-03855, UPDATED JOINT STIPULATION BETWEEN THE PARTIES REGARDING REPRESENTATIVE ACCUSED TONER BOTTLE PRODUCTS, D.I. 207 (N.D. Ga. March 24, 2014)
30	Letter from Canon to Respondents, dated June 3, 2015

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