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BY \_\_\_\_\_

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6 Attorneys for Plaintiffs RPOST  
7 HOLDINGS, INC., RPOST  
8 INTERNATIONAL LIMITED, and  
9 RMAIL LIMITED

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

12 **CV09 08759 CBM VBKx**  
13 CASE NO. \_\_\_\_\_

14 RPOST HOLDINGS, INC., RPOST  
15 INTERNATIONAL LIMITED, and  
16 RMAIL LIMITED,

17 Plaintiffs,

18 vs.

19 GLOBALPEX, INC.,

20 Defendant.

21 **COMPLAINT FOR PATENT  
22 INFRINGEMENT; DEMAND  
23 FOR JURY TRIAL**

1 Plaintiffs RPost Holdings, Inc., RPost International Limited, and RMail  
2 Limited, for their complaint against Defendant Globalpex, Inc. (“Globalpex”),  
3 allege as follows:  
4

### 5 NATURE OF THE ACTION

6 1. Globalpex advertises and provides services for the authentication of  
7 documents, including messages. These services infringe several patents owned  
8 by, or licensed to, Plaintiffs. Plaintiffs seek injunctive relief to prevent Globalpex  
9 from continuing to infringe their patent rights. Plaintiffs also seek monetary  
10 damages for Globalpex’s past infringement.  
11

### 12 JURISDICTION AND VENUE

13 2. This Court has jurisdiction over this patent infringement action  
14 pursuant to 28 U.S.C. §§ 1331 and 1338(a).

15 3. Venue is proper in this district pursuant to 28 U.S.C §§1391(c) and  
16 1400(b).  
17

### 18 THE PARTIES

19 4. Plaintiff RMail Limited (“RMail”) is a corporation organized under  
20 the laws of the Nation of Bermuda. It is the owner of United States Patent No.  
21 6,182,219 (the “‘219 Patent”).

22 5. RPost International Limited (“RPI”) is a corporation organized under  
23 the laws of the Nation of Bermuda. It is the owner of United States Patent No.  
24 7,240,199 (the “‘199 Patent”). It is also the exclusive licensee, from RMail, of the  
25 ‘219 Patent.

26 6. RPost Holdings, Inc. (“RPost”) is a corporation organized under the  
27 laws of the State of Delaware, having an office in this District. It is the exclusive  
28 licensee, from RIP, of the ‘199 and ‘219 Patents.





1 **DEMAND FOR JURY TRIAL**

2 Plaintiffs RPost Holdings, Inc., RPost International Limited, and RMail  
3 Limited hereby demand trial by jury on all issues for which a jury trial may be had.  
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5 Dated: November 25, 2009

Respectfully submitted,

6 BEN-ZVI & ASSOCIATES

7  
8 By: 

9 HENRY BEN-ZVI

10 Attorneys for Plaintiffs RPOST  
11 HOLDINGS, INC., RPOST  
12 INTERNATIONAL LIMITED, and RMAIL  
13 LIMITED  
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