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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: \_\_\_\_\_

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6 Attorneys for Plaintiffs RPOST  
7 HOLDINGS, INC., RPOST  
8 INTERNATIONAL LIMITED, and  
9 RMAIL LIMITED  
10

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
13

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

17 Plaintiffs,

18 vs.

19 TRUSTIFI CORPORATION,

20 Defendant.  
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CASE NO. **Cv 10-01416-PSG(SM)**  
**COMPLAINT FOR PATENT  
INFRINGEMENT; DEMAND  
FOR JURY TRIAL**

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

5 **NATURE OF THE ACTION**

6 1. Trustifi advertises, and provides, a message authentication service it  
7 calls Trustifi Postmarked Email. This service infringes several patents owned by,  
8 or licensed to, Plaintiffs. Plaintiffs seek injunctive relief to prevent Trustifi from  
9 continuing to infringe their patent rights. Plaintiffs also seek monetary damages  
10 for Trustifi’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, 1332, and 1338(a).  
15

16 3. Venue is proper in this district pursuant to 28 U.S.C §§1391(c) and  
17 1400(b).  
18

19 **THE PARTIES**

20 4. Plaintiff RMail Limited (“RMail”) is a corporation organized under  
21 the laws of the Nation of Bermuda. It is the owner of United States Patent No.  
22 6,182,219 (the “‘219 Patent”) and United States Patent No. 6,571,334 (the “‘334  
23 Patent”).  
24

25 5. RPost International Limited (“RPI”) is a corporation organized under  
26 the laws of the Nation of Bermuda. It is the owner of United States Patent No.  
27 7,250,199 (the “‘199 Patent”). It is also the exclusive licensee, from RMail, of the  
28 ‘219 and ‘334 Patents.



1           1.     For an order provisionally, and permanently, enjoining Trustifi, and  
2 its agents, attorneys, successors, assigns, and all persons acting in concert with it,  
3 from making, using, selling, offering to sell products or services that infringe the  
4 '199 or the '219 Patents, and from otherwise infringing the '199 and '219 Patents.

5  
6           2.     For damages in an amount to be proven at trial.

7  
8           3.     For costs, interest, and attorneys' fees as permitted by law.

9  
10          4.     For such other relief as the Court may deem just.

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12  
13 Dated: February 25, 2010

Respectfully submitted,

BEN-ZVI & ASSOCIATES

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16  
17 By: 

HENRY BEN-ZVI


Attorneys for Plaintiffs RPOST  
HOLDINGS, INC., RPOST  
INTERNATIONAL LIMITED, and RMAIL  
LIMITED

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: February 25, 2010

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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