

Center Street, Suite 202, Merchantville, New Jersey, owns the patent in suit, the '411 patent, being infringed by Defendants.

3. Upon information and belief, Defendants' have a principal place of business at 25835 Southfield Road, Southfield, Michigan 48075, and engage in business in the State of Michigan and this judicial district including the use, marketing and sale of procedures and methods that infringe ADI's '411 Patent.

4. Upon information and belief, Defendant Julia Aharonov is an anesthesiologist and owner of Defendant MDS.

5. Upon information and belief, Defendant Joseph A. George is a Medical Doctor and owner of Defendant MDS.

JURISDICTION AND VENUE

6. This Court has proper, original and exclusive jurisdiction over the subject matter of this action under 35 U.S.C. §§271 and 281, *et seq.* and 28 U.S.C. §§1331 and 1338.

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 (b)-(c) and 1400 (b).

COUNT 1

RAPID DRUG DETOX CENTER'S INFRINGEMENT OF ADI'S PATENT

8. ADI alleges and incorporates by reference the allegations set forth in paragraphs 1-8.

9. On August 4, 1998, the United States Patent Office duly and legally issued United States Patent No. 5,789,411 titled “Improvements to Rapid Opioid Detoxification”, a copy of which is attached as Exhibit 1.

10. ADI is the assignee and owner of the Patents.

11. In violation of ADI’s exclusive rights under the patent laws of the United States, Defendants’, each of them, have directly infringed the Patents by making, using, selling, offering for sale in the United States activities, methods and procedures claimed in the Patent, Exhibit 1.

12. Defendants’ have induced infringement of and/or contributorily infringed the Patent.

13. By reason of Defendants’ infringing activities, ADI has suffered, and will continue to suffer, substantial damages, in and amount to be proven at trial.

14. Defendant’s conduct also has caused, and will continue to cause, ADI irreparable harm. Defendant’s conduct is likely to continue unless it is enjoined from such conduct by this Court.

15. Upon information and belief, while Defendants have had direct knowledge of ADI’s Patent Rights, it has nonetheless continued its unlawful conduct without taking reasonable precautions to avoid such infringement and, therefore, such infringement has been willful and deliberate. ADI is entitled to recover damages for its injury and Defendants’ willful infringement.

PRAYER FOR RELIEF

WHEREFORE, as a result of the unlawful acts of Defendants set forth herein, ADI prays for:

- A. the entry of judgment that Defendants have infringed, and continues to infringe, and to contribute to and induce infringement of ADI's '411 Patent;
- B. an injunction prohibiting Defendants' and all persons in concert and participation with Defendants from making, using, selling, offering for sale, and importing in the United States activities that embody the invention, claimed in ADI's '411 Patents;
- C. an award of damages adequate to compensate ADI for Defendants' infringement of ADI's '411 Patents;
- D. an award that trebles the amount of actual damages assessed against Defendants' and in favor of ADI pursuant to U.S.C. § 284;
- E. an award of reasonable attorney fees and costs pursuant to U.S.C. § 285;
- and
- F. such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

ADI respectfully requests a trial by jury as to all issues so triable.

DATED THIS _____ DAY OF DECEMBER, 2013.

Respectfully submitted,

By: Thomas K. Mirabile
Plaintiff's Attorney

Local Counsel for Plaintiff
Jonathan Rosenthal
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CERTIFICATE OF SERVICE

I hereby certify that on December _____, 2013, pursuant to Federal Rules of Civil Procedure Rule 5 and the Eastern District of Michigan's General Order on Electronic Case Filing, I caused the following documents:

FIRST COMPLAINT
EXHIBIT 1

to be filed electronically with the Clerk of the Court through ECF, and that ECF will send an e-notice of the electronic filing to the following;

Julia Aharonov, D.O.
MDS Drug Detox Clinic
25835 Southfield Road
Southfield, MI 48075

Joseph A. George, M.D.
MDS Drug Detox Clinic
25835 Southfield Road
Southfield, MI 48075

I hereby certify that on December _____, 2013, I provided service to the persons listed above by the following means:

Dated: December , 2013

Respectfully submitted,

Thomas K. Mirabile
Attorney for Plaintiff

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