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*Attorneys for Plaintiff
Lottotron, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

LOTTOTRON, INC.,
a New Jersey Corporation,
Plaintiff,

v.

ATHILA STATION, ET AL.
Defendants.

Civil Action No.

JURY TRIAL DEMANDED

ELECTRONICALLY FILED

COMPLAINT

Now comes the plaintiff, Lottotron, Inc. ("Lottotron"), and alleges by way of complaint Athila Station, Austant Holdings Ltd. ("Austant Holdings"), BTK Ltd. ("BTK"), Carmen Media Group, WebMedia 1, Ltd. d/b/a CashWave.com ("WebMedia"), Casinos Austria International ("Casinos Austria"), Cassava Enterprises, Ltd. ("Cassava"), Central Pacific Ltd. ("Central Pacific"), Cyber Gaming International Ltd. ("Cyber Gaming"), CyberBetting Ltd. ("CyberBetting"), Ensis Technologies, Inc. ("Ensis"), Essel Corporate Resources Private Ltd. ("Essel"),

Fortune Lounge Group, Gantor International Ltd. (“Gantor”), GlobetCasino.com (“GlobetCasino”), Go North Ltd. (“Go North”), International Gaming & Entertainment Ltd. (“International Gaming”), iNetbet Internet Gaming Services (“iNetbet”), Isagro Holdings Ltd. (“Isagro”), ITS Ltd. (“ITS”), Legendz Sports, OIGE CG Ltd. (“OIGE”), Onnea Trading Ltd. (“Onnea Trading”), Operia Corp. Ltd. (“Operia”), The Palace Group (“Palace Group”), PartyGaming Plc (“PartyGaming”), Playtech Ltd. (“Playtech”), Popular Casino Group Ltd. (“Popular Casino Group”), Razzo Ltd. (“Razzo”), Real Entertainment Ltd. (“Real Entertainment”), S.I.A. Ltd. (“SIA”), Slotland Entertainment, S.A. (“Slotland Entertainment”), Sportscontent Ltd. (“Sportscontent”), Squarit Ltd. (“Squarit”), Story Games Ltd. (“Story Games”), Stryke Entertainment Ltd. (“Stryke”), Sulkin Ltd. (“Sulkin”), Trenan Ltd. (“Trenan”), VBC Ltd. (“VBC”), Winward Hall Ltd. (“Winward Hall”), collectively the (“Defendants”) as follows:

PARTIES

1. Lottotron is a New Jersey corporation, having a principal place of business located at 207 Lodi Street, Hackensack, New Jersey 07601-3916.

2. Upon information and belief, defendant Athila Station is a corporation organized under the laws of Panamá, having a principal place of business at Via Italia, Bal Harbour Ofc. 38, Panamá City, Panamá.

3. Upon information and belief, defendant Astant Holdings is a corporation organized under the laws of Cyprus, having a principal place of

business at Themistokli Dervi 48, Centennial Building 3rd Floor, Flat 303, Nicosia, Cyprus 1066.

4. Upon information and belief, defendant BTK is a corporation organized under the laws of the United Kingdom, having a principal place of business at 2a-3a Bedford Place, Southampton SO15 2DB, United Kingdom.

5. Upon information and belief, defendant Carmen Media Group is a corporation organized under the laws of Gibraltar, having a principal place of business at Tower Rock Ltd., 651 Europort, Gibraltar.

6. Upon information and belief, defendant WebMedia1 is a corporation organized under the law of the United Kingdom, having a principal place of business at 60 Windsor Avenue, London, England SW19 2RR, United Kingdom.

7. Upon information and belief, defendant Casinos Austria is a corporation organized under the laws of Austria, having a principal place of business at Doctor Karl Lueger Ring 14, Vienna, Austria 1015.

8. Upon information and belief, defendant Cassava is a corporation organized under the laws of Gibraltar, having a principal place of business at 601-701 Europort, Gibraltar.

9. Upon information and belief, defendant Central Pacific is a corporation organized under the laws of Gibraltar, having a principal place of business at Gibro House, 4 Giro's Passage, Gibraltar.

10. Upon information and belief, defendant Cyber Gaming is a corporation organized under the laws of the United Kingdom, having a principal place of

business at 12 Linden Way, Blackhill, DH8 5UH Consett, Durham, United Kingdom.

11. Upon information and belief, defendant CyberBetting is a corporation organized under the laws of the United Kingdom, having a principal place of business at 7 Woodwyn, Leam Lane Estate, Gateshead, England, United Kingdom NE10 8NS.

12. Upon information and belief, defendant Ensis is a corporation organized under the laws of the United Kingdom, having a principal place of business at 1-5 Lillie Road, London SW6 1TX, United Kingdom.

13. Upon information and belief, defendant Essel is a corporation organized under the laws of India, having a principal place of business at 135, Continental Building, Dr. Annie Besant Road, Worli, Mumbai No. 400 018, India.

14. Upon information and belief, defendant Fortune Lounge Group is a corporation organized under the laws of Belize, having a principal place of business at 1934 Driftwood Bay, Belize City, Belize 1934.

15. Upon information and belief, defendant Gantor is a corporation organized under the laws of Malta, having a principal place of business at 109 Triq Sir William Reid, Gzira, Malta.

16. Upon information and belief, defendant GlobetCasino is a corporation organized under the laws of Gibraltar, having a principal place of business at Suite 18-20 Watergardens, Block 3, Gibraltar.

17. Upon information and belief, defendant Go North is a corporation organized under the laws of Malta, having a principal place of business at Villa Seminia 8, Sir Temi Zammit Avenue, Ta'Xbiex XBX 1011, Malta.

18. Upon information and belief, defendant International Gaming is a corporation organized under the laws of Antigua, having a principal place of business at 60 Nevis Street, St. John's, Antigua.

19. Upon information and belief, defendant iNetbet is a corporation organized under the laws of the United Kingdom, having a principal place of business at Broomsleigh Farm Office, Kent, England, United Kingdom TN15 OES.

20. Upon information and belief, defendant Isagro is a corporation organized under the laws of Cyprus, having a principal place of business at Afroditis 25, 2nd Floor, Office 204, Nicosia, Cyprus.

21. Upon information and belief, defendant ITS is a corporation organized under the laws of British Virgin Islands, having a principal place of business at P.O. Box 3152, Road Town, Tortola 10110, British Virgin Islands.

22. Upon information and belief, defendant Legendz Sports is a corporation organized under the laws of Panamá, having a principal place of business at Albrook Office Park, Building 20, Calle Ruben Dario, Ancon, Panamá.

23. Upon information and belief, defendant OIGE is a corporation organized under the laws of Malta, having a principal place of business at Vincenti Buildings, Suite 400, 14/19 Strait Street, Valletta VLT 1432, Malta.

24. Upon information and belief, defendant Onnea Trading is a corporation organized under the laws of Cyprus, having a principal place of business at Stasinou, Flat/Office 203, Strovolos, Lefkosia, Cyprus 2014.

25. Upon information and belief, defendant Operia is a corporation organized under the laws of Panamá, having a principal place of business at 50th Street - Global Plaza Tower, 19th Floor, Suite H, Panamá City, Panamá.

26. Upon information and belief, defendant Palace Group is a corporation organized under the laws of Belize, having a principal place of business at Mapp Street, Belize City, Belize.

27. Upon information and belief, defendant PartyGaming is a corporation organized under the laws of Gibraltar, having a principal place of business at 711 Europort, Gibraltar.

28. Upon information and belief, defendant Playtech is a corporation organized under the laws of the United Kingdom, having a principal place of business at St. George's Court Upper Church Street, 2nd Floor, Douglas IM1 1EE, Isle of Man, United Kingdom.

29. Upon information and belief, defendant Popular Casino Group is a corporation organized under the laws of Gibraltar, having a principal place of business at Main Street 23, Gibraltar.

30. Upon information and belief, defendant Razzo is a corporation organized under the laws of Cyprus, having a principal place of business at Agora Anexartisias, Flat/Office 43, Anexartisias, Lemesos, Cyprus 3036.

31. Upon information and belief, defendant Real Entertainment is a corporation organized under the laws of Antigua, having a principal place of business at World Gaming Unit 5, Jasmine Court, Friars Hill Road, St. John's, Antigua.

32. Upon information and belief, defendant SIA is a corporation organized under the laws of Canada, having a principal place of business at 2006 Old Malone Road, 2nd Floor, Suite 201, Kahnawake, Quebec J0L 1B0, Canada.

33. Upon information and belief, defendant Slotland Entertainment is a corporation organized under the laws of Comoros, having a principal place of business at Suite 2100 A.C.S., BP 269, Mutsamudu, Anjouan, Comoros.

34. Upon information and belief, defendant Sportscontent is a corporation organized under the laws of Belize, having a principal place of business at Albert Street 99, Belize City, Belize.

35. Upon information and belief, defendant Squarit is a corporation organized under the laws of Belize, having a principal place of business at 1 Mapp Street, Belize City, Belize.

36. Upon information and belief, defendant Story Games is a corporation organized under the laws of Seychelles, having a principal place of business at 306 Victoria House, Victoria, Seychelles.

37. Upon information and belief, defendant Stryyke is a corporation organized under the laws of Malta, having a principal place of business at Cobalt House, Second Floor, Notiabile Road, Mriehel, Malta QRM09.

38. Upon information and belief, defendant Sulkin is a corporation organized under the laws of Cyprus, having a principal place of business at Griva Digeni 115, Trident Centre, Mesa Geitonia, Lemesos, Cyprus.

39. Upon information and belief, defendant Trenan is a corporation organized under the laws of Cyprus, having a principal place of business at Zinionos Kitieos, Egkomi, Lefkosia, Cyprus.

40. Upon information and belief, defendant VBC is a corporation organized under the laws of the United Kingdom, having a principal place of business at 2 Old Bromton Road, London, England, United Kingdom SW7 3DQ.

41. Upon information and belief, defendant Winward is a corporation organized under the laws of Ireland, having a principal place of business at AXXIS, National Software Centre Campus, Mahon, Cork, Ireland.

JURISDICTION AND VENUE

42. This Court has subject matter jurisdiction under 28 U.S.C. § 1338(a).

43. Athila Station, through its interactive website, Billy's Casino Cubed, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

44. Astant Holdings, through its interactive website, VA Bank Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

45. BTK, through its interactive websites, coolcat-casino.com, 123bingo.com, palaceofchance.com, Silver Oak Casino and Royal Ace Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

46. Carmen Media Group, through its interactive websites, riverbelle.com, jackpotcity.com, luckynugget.com, gamingclub.com, kingneptunescasino.co.uk and capitalcasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

47. WebMedia, through its interactive website, CashWave.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

48. Casinos Austria, through its interactive website, CAI Games Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

49. Cassava, through its interactive website, littlewoodscasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

50. Central Pacific, through its interactive website, iVegas.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

51. Cyber Gaming, through its interactive websites, vegasmagic.com, Slot Fever Casino and Vegas Luck Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

52. CyberBetting, through its interactive websites, blast21.com and BetMax Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

53. Ensis, through its interactive websites, Russian Casino and Breeze Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

54. Essel, through its interactive website, maharajacasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

55. Fortune Lounge Group, through its interactive websites, desertdollar.com, platinumplay.com, royalvegas.com, vegaspalms.com, vegastowers.com, vegasvilla.com, kingsolomons.com and windowscasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

56. Gantor, through its interactive website, Yachting Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

57. GlobetCasino, through its interactive website, globetcasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

58. Go North, through its interactive websites, 777dragoncasino.eu, goldenrivieracasino.com, rivernilecasino.com, casinous.co.uk, cinemacasino.co.uk, crazyvegascasino.co.uk, sunvegas.co.uk and roxypalace.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

59. International Gaming, through its interactive website, Intertops Red Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

60. iNetbet, through its interactive website, iNetBet Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

61. Isagro, through its interactive websites, Slot Oasis Casino, Cherry Red Casino and Rushmore Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

62. ITS, through its interactive websites, Aztec Riches Casino, Blackjack Ballroom, Captain Cooks Casino, Casino Classic, Casino Kingdom, Golden Tiger Casino, Lucky Emperor Casino, Phoenician Casino, Strike It Lucky Casino, Virtual City Casino, Yukon Gold Casino and Zodiac Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

63. Legendz Sports, through its interactive website, legends.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

64. OIGE, through its interactive website, InterCasino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

65. Onnea, through its interactive website, Cleopatra's Palace Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

66. Operia, through its interactive website, Pamper Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

67. Palace Group, through its interactive website, rubyfortune.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

68. PartyGaming, through its interactive websites, casinolasvegas.com, partycasino.com, partybingo.com and clubdicecasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

69. Playtech, through its interactive website, Casino Solei, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

70. Popular Casino, through its interactive websites, slotsalley.com, casinoonliner and lucknrollcasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

71. Razzo, through its interactive website, GoldSmir Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

72. Real Entertainment , through its interactive website, Win4real Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

73. S.I.A., through its interactive website, sportsinteraction.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

74. Slotland, through its interactive website, slotland.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

75. Sportscontent, through its interactive website, First Royal Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

76. Squarit, through its interactive website, All Jackpots Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

77. Story Games, through its interactive website, Casino-Broceliande.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

78. Stryke, through its interactive website, Stryke Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

79. Sulkin, through its interactive website, Grande Vegas Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

80. Trenan through its interactive website, Sloto'Cash Casino, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

81. VBC, through its interactive website, Casino Solei, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

82. Winward Hall, through its interactive websites, winwardcasino.com, bingohall.com and richcasino.com, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

83. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1400.

COUNT I – PATENT INFRINGEMENT

84. Lottotron hereby incorporates by reference the allegations contained in paragraphs 1-83, above.

85. Lottotron is the owner by assignment of U.S. Patent No. 5,921,865, entitled *Computerized Lottery Wagering System* (“the ‘865 patent”). A copy of the patent-in-suit is attached hereto as Exhibit A.

86. The operation of Defendants’ on-line, interactive gaming websites directly infringes the claims of the patent in suit in violation of 35 U.S.C. § 271(a).

87. The defendants have also induced and contributed to the infringement of the claims of the '865 patent by others.

88. Defendants' infringement has caused irreparable injury to Lottotron.

PRAYERS FOR RELIEF

WHEREFORE, Lottotron respectfully requests the following relief:

1. That Defendants be found by this Court to infringe the '865 patent;
2. That the Court award Lottotron its damages in accordance with 35 U.S.C. § 284;
3. That the Court award Lottotron its costs, including attorneys' fees, and an assessment of interest;
4. That the defendants, their agents, officers, sales representatives, servants, employees, representatives, associates, attorneys, successors and assigns, and any and all persons or entities acting by, through, under, or in concert, privity or in participation with, any or all of them, be permanently enjoined by Order of this Court from doing, abiding, causing, aiding or abetting any of the following:
 - (a) directly or indirectly infringing, or inducing or causing any person or entity to infringe the '865 patent; or
 - (b) contributing to the infringement of the '865 patent; or
 - (c) from assisting, aiding or abetting any other person or entity from engaging in or performing any of the above-described acts.
5. That the Court issue an order directing the defendants to provide proof that they have ceased infringing the '865 patent;

6. That the defendants be directed to pay over to Lottotron all damages suffered by Lottotron as a result of the defendants' acts herein complained of;
7. That the Court find this case to be exceptional; and
8. That the Court grant such other and further relief as it deems just and proper.

JURY DEMANDED

Lottotron hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

VOLPE AND KOENIG, P.C.

Date: August 19, 2010

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*Attorneys for Plaintiff
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CERTIFICATION PURSUANT TO L. CIV. R. 11.2

Pursuant to Local Civil Rule 11.2, I hereby certify that the matter in controversy is the subject of other actions:

Lottotron, Inc. v. EH New Ventures, Inc., et al., D.N.J. 2:09-cv-04942 (FSH)(PS)
Lottotron, Inc. v. Peak Entertainment, et al., D.N.J. 2:09-cv-06387 (FSH)(PS) (consolidated with Lottotron, Inc. v. EH New Ventures, Inc., et al., D.N.J. 2:09-cv-04942 (FSH)(PS))
Lottotron, Inc. v. SBG Online Casino, et al., D.N.J. 2:10-cv-00337 (SRC)(MAS)
Lottotron, Inc. v. CWC Ltd., D.N.J. 2:09-cv-04655 (SRC)(MAS) (CLOSED)
Lottotron, Inc. v. GTech Corp, D.N.J. 3:05-cv-4562 (FLW)(JJH) (CLOSED)
Lottotron, Inc. v. Rational Poker School, Ltd., d/b/a Pokerstars, D.N.J. 2:08-cv-04874 (WJM)(MF) (CLOSED)
Lottotron, Inc. v. Morris Mohawk Gaming Group, D.N.J. 3:05-cv-4562 (FSH)(MAS) (CLOSED)

Respectfully submitted.

VOLPE AND KOENIG, P.C.

Date: August 19, 2010

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