

Michael F. Snyder (MS-6312)
Ryan W. O'Donnell (RO-2904)
VOLPE AND KOENIG, P.C.
United Plaza, Suite 1600
30 South 17th Street
Philadelphia, PA 19103
(215) 568-6400
Attorneys for Plaintiff
Lottotron, Inc.

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

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

Plaintiff,)

v.)

CIVIL ACTION NO.

RATIONAL POKER SCHOOL LTD.)
d/b/a POKERSTARS,)
an Isle of Man Corporation,)

JURY TRIAL DEMANDED

Defendant.)

COMPLAINT

Now comes the plaintiff, Lottotron, Inc. (“Lottotron”), and alleges by way of complaint against the defendant, Rational Poker School, Ltd., d/b/a PokerStars (“PokerStars”) 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. PokerStars is a corporation organized under the laws of the Isle of Man, having a principal place of business at 49 Victoria Street, Douglas, Isle of Man, IM1 2LD, United Kingdom.

JURISDICTION AND VENUE

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

4. PokerStars, through its interactive website, www.pokerstars.net, offers a multiple-game, on-line wagering format in this Judicial District and elsewhere.

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

COUNT I – PATENT INFRINGEMENT

6. Lottotron hereby incorporates by reference the allegations contained in paragraphs 1-5, above.

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

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

9. PokerStars has also induced and contributed to the infringement of the claims of the patent in suit by others.

10. PokerStars' infringement has caused irreparable injury to Lottotron.

PRAYERS FOR RELIEF

WHEREFORE, Lottotron respectfully requests the following relief:

1. That PokerStars be found by this Court to infringe the patent in suit;
2. That PokerStars, 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 preliminarily and 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 patent in suit; or

(b) contributing to the infringement of the patent in suit; or

(c) from assisting, aiding or abetting any other person or entity from engaging in or performing any of the above-described acts.

3. That the Court issue an order directing PokerStars to provide proof that they have ceased infringing the patent in suit;

4. That the Court award Lottotron its damages in accordance with 35 U.S.C. § 284;

5. That the Court award Lottotron its costs, including attorneys' fees, and an assessment of interest;

6. That PokerStars be directed to pay over to Lottotron all damages suffered by Lottotron as a result of PokerStars acts herein complained of;

7. That the Court finds this case to be exceptional; and,

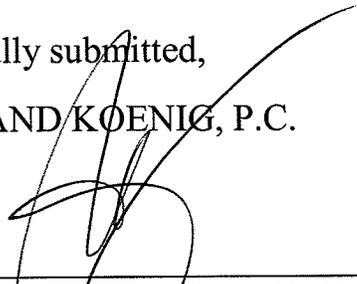
8. That the Court grant such other and further relief as it deems just and proper.

JURY DEMAND

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

Respectfully submitted,
VOLPE AND KOENIG, P.C.

Dated: 9/26/08

By: 
Michael F. Snyder (MS-6312)
Ryan W. O'Donnell (RO-2904)
Volpe and Koenig, P.C.
United Plaza, Suite 1600
30 S. 17th Street
Philadelphia, PA 19103
Tel: (215) 568-6400
Fax: (215) 568-6499

*Attorneys for Plaintiffs
Lottotron, Inc.*

OF COUNSEL:

George C. Summerfield, Esquire
Joseph A. Grear, Esquire
Keith A. Vogt, Esquire
Steven R. Pedersen, Esquire
STADHEIM & GREAR
400 North Michigan Avenue
Suite 2200
Chicago, Illinois 60611
(312) 755-4400