

1. Lottotron is a New Jersey Corporation, having a principal place of business located at 207 Lodi Street, Hackensack, New Jersey 07601-3916.
2. GTECH is a Rhode Island Corporation having a principal place of business at 55 Technology Way, Greenwich, Rhode Island 02817.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction under 28 U.S.C. § 1338(a).
4. GTECH is registered to do business in this judicial district as a foreign for-profit corporation, having a place of business located at 1333 Brunswick Pike, Trenton, New Jersey 08638.
5. On information and belief, GTECH has made and, in this judicial district and elsewhere, sold, offered for sale, and continues to offer for sale, software that supports a multiple-game, on-line lottery format.
6. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1400.

COUNT I – PATENT INFRINGEMENT

7. Lottotron hereby incorporates by reference the allegations contained in paragraphs 1-6, above.
8. Lottotron is the owner by assignment of U.S. Patent Nos. 5,921,865; 5,910,047; 5,904,619; 5,816,919; and 5,415,416, all entitled *Computerized Lottery Wagering System* (collectively “the patents in suit”).
9. GTECH’s offer for sale and sale of software that supports a multiple-game, on-line lottery format directly infringes the claims of the patents in suit in violation of 35 U.S.C. § 271(a).
10. GTECH has also induced and contributed to the infringement of the claims of the patents in suit by others.
11. GTECH’s infringement has caused irreparable injury to Lottotron.
12. On information and belief, GTECH’s infringement of the patents in suit has been willful.

WHEREFORE, Lottotron prays that this Court award damages in an amount sufficient to compensate Lottotron for GTECH's infringement, prejudgment interest, enhanced damages for GTECH's willful infringement, Lottotron's reasonable attorney fees and costs, an order of this Court enjoining GTECH from further acts constituting infringement of the patents in suit, and such other and further relief as this Court shall deem just and proper.

Respectfully submitted,



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