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U.S. DISTRICT COURT

2005 MAY 27 P 3:07

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ATLANTIC CITY COIN & SLOT
SERVICE COMPANY, INC.,
a New Jersey Corporation
201 West Decatur Avenue
Pleasantville, NJ 08232

and

TC MILLWORK, INC.,
a Pennsylvania Corporation,
600 Center Street
Bensalem, PA 19020

Plaintiffs,

v.

VSR LOCK, INC.,
a Nevada Corporation,
6440 S. Polaris Avenue
Las Vegas, Nevada 89118

and

DOES 1-10,

Defendants.

CIVIL ACTION NO. 05 CV 2784

JURY TRIAL DEMANDED (JBS)

COMPLAINT FOR PATENT INFRINGEMENT
AND DEMAND FOR JURY TRIAL.

Plaintiffs, Atlantic City Coin & Slot Service Company, Inc. ("AC Coin"), and TC Millwork, Inc. ("TC Millwork"), file this Complaint against defendants VSR Lock, Inc ("VSR Lock") and DOES 1-10, and demand a trial by jury, as follows:

JURISDICTION AND VENUE

1. This cause of action is for patent infringement, which arises under the patent laws of the United States, Title 35, United States Code. This Court has original jurisdiction over subject matter of this cause of action pursuant to the provisions of 28 U.S.C. §§ 1331 and 1338(a).

2. Upon information and belief, venue is proper under 28 U.S.C. §§ 1391(b) and 1391(c), as well as 28 U.S.C. § 1400(b).

THE PARTIES

3. AC Coin is a corporation incorporated under the laws of the State of New Jersey and has its principal place of business at 201 West Decatur Avenue, Pleasantville, New Jersey 08232.

4. TC Millwork is incorporated under the laws of Pennsylvania and has its principal place of business at 600 Center Street, Bensalem, Pennsylvania 19020.

5. Upon information and belief, defendant VSR Lock is a corporation incorporated under the laws of the State of Nevada and has its principal place of business at 6440 S. Polaris Avenue, Las Vegas, Nevada 89118.

6. Upon information and belief, VSR Lock resides in this district under 28 U.S.C. § 1391. In particular, VSR Lock does business in this district and a substantial part of the events giving rise to the claims in this case occurred in this district.

7. Upon information and belief, the Doe Defendants are involved with VSR Lock and/or the activities alleged in this Complaint, but AC Coin and TC Millwork have been unable to

identify the names of the Doe Defendants from public records available to AC Coin and TC Millwork. AC Coin and TC Millwork have thus sued the Doe Defendants by their fictitious names. AC Coin and TC Millwork will seek leave to amend this Complaint to allege the true names, capacities, and residences of the Doe Defendants when ascertained. Defendant VSR Lock and the Doe Defendants are collectively referred to as the "Defendants."

CAUSE OF ACTION

(Patent Infringement - United States Patent D492,363)

(35 U.S.C. §§ 271, et seq.)

8. On June 29, 2004, United States Patent D492,363 ("the '363 patent"), for an invention entitled "Gaming Device Base," was duly and legally issued in the names of Mac Seelig, Jerald C. Seelig, Eric H. Berju and Edward Leder. By virtue of proper assignment, AC Coin and TC Millwork have acquired and duly own all right, title, and interest in this patent, including the right to sue and recover for infringement thereof. A copy of the '363 patent is attached to this Complaint as Exhibit "1."

9. Upon information and belief, Defendants have notice of AC Coin's and TC Millwork's rights in the '363 patent.

10. Defendants have infringed the '363 patent by manufacturing, using, offering to sell, selling, and/or importing gaming device bases embodying one or more of the inventions claimed therein within United States, or by supplying infringing products to others to use, thereby inducing and/or contributing to the infringement of the '363 patent, and will continue to do so unless enjoined by this Court.

11. By reason of Defendants' acts of infringement, AC

Coin and TC Millwork have suffered and are suffering damages, including impairment of the value of the '363 patent, in an amount yet to be determined.

12. Defendants' acts of infringement are causing irreparable harm to AC Coin and TC Millwork and will continue to cause irreparable harm unless enjoined by this Court.

13. Upon information and belief, Defendants' acts have been committed willfully and with knowledge of AC Coin's and TC Millwork's patent rights and have resulted, and are currently resulting, in substantial unjust profits and unjust enrichment on the part of Defendants in an amount yet to be determined.

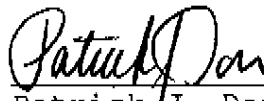
WHEREFORE, AC Coin and TC Millwork respectfully demand judgment that:

1. Defendants, their officers, directors, agents, servants, employees, attorneys, confederates, and all persons and/or entities acting for, with, by, through, or in concert with Defendants, or any of them, be enjoined preliminarily and permanently:
 - (a) from infringing the '363 patent, either directly or contributorily; and
 - (b) from inducing others to infringe the '363 patent.
2. Defendants be required to deliver to the Court any and all gaming device bases in their possession, custody, and/or control that infringed the '363 patent during the term of the patent.
3. Defendants be required to prepare and deliver to the Court a complete list of entities from whom

Defendants purchased, and to whom they distributed and/or sold, products which infringe and/or which infringe the '363 patent, and to serve a copy of such list to AC Coin and TC Millwork attorney.

4. Defendants, within thirty (30) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon AC Coin and TC Millwork attorney a written report, under oath, setting forth in detail the manner in which Defendants have complied with Paragraphs 1-3 above.
5. Defendants be required to account for and pay over to AC Coin and TC Millwork cumulative damages sustained by AC Coin and TC Millwork by reason of Defendants' unlawful acts of patent infringement herein alleged, that the amount of recovery be increased as provided by law, up to three times, and that interest and costs be awarded to AC Coin and TC Millwork under 35 U.S.C. § 285.
6. AC Coin and TC Millwork be awarded their reasonable costs.
7. AC Coin and TC Millwork have such other further relief as the Court may deem equitable.

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EXHIBIT 1



US00D492363S1

(12) **United States Design Patent** (10) Patent No.: **US D492,363 S**
Seelig et al. (45) Date of Patent: **** Jun. 29, 2004**

(54) **GAMING DEVICE BASE**

(75) Inventors: **Mac Seelig, Absecon, NJ (US); Jerald C. Seelig, Absecon, NJ (US); Eric H. Berju, Cherry Hill, NJ (US); Edward Leder, Rushland, PA (US)**

(73) Assignees: **Atlantic City Coin & Slot Service Company, Inc., Pleasantville, NJ (US); TC Millwork, Inc., Bensalem, PA (US)**

(**) Term: **14 Years**

(21) Appl. No.: **29/167,400**

(22) Filed: **Sep. 13, 2002**

(51) LOC (7) Cl. **21-03**

(52) U.S. Cl. **D21/370; D21/385**

(58) Field of Search **D21/325, 329, D21/369-371, 374, 385; 273/138.1; 463/16-17, 20, 46-47**

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Primary Examiner—Sandra L. Morris

(74) *Attorney, Agent, or Firm*—Randall S. Jackson, Jr.; Ian E. Burns & Assoc.

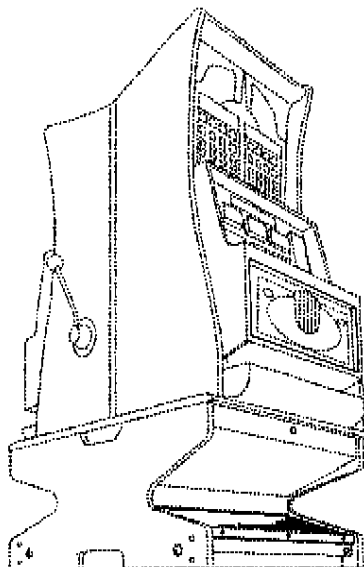
(57) **CLAIM**

The ornamental design for a gaming device base, as shown and described.

DESCRIPTION

FIG. 1 is a perspective view of a gaming device base; FIG. 2 is a front elevational view thereof; FIG. 3 is a perspective view of a second embodiment of the design, in use with a plurality of gaming devices; and, FIG. 4 is a front elevational view thereof. Broken lines illustrate features or environmental components that are not part of the design sought to be patented.

1 Claim, 4 Drawing Sheets



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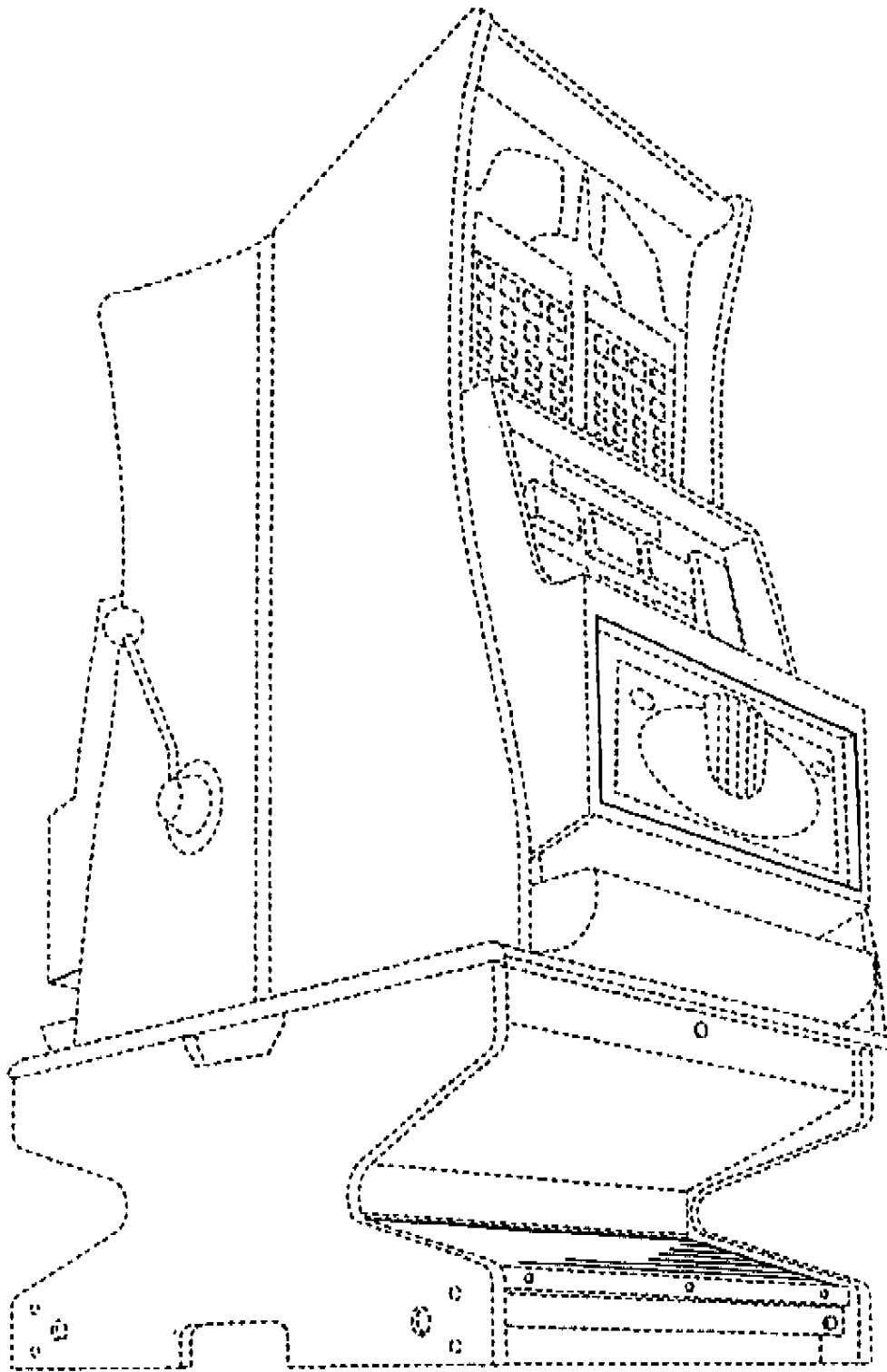


FIG. 1.

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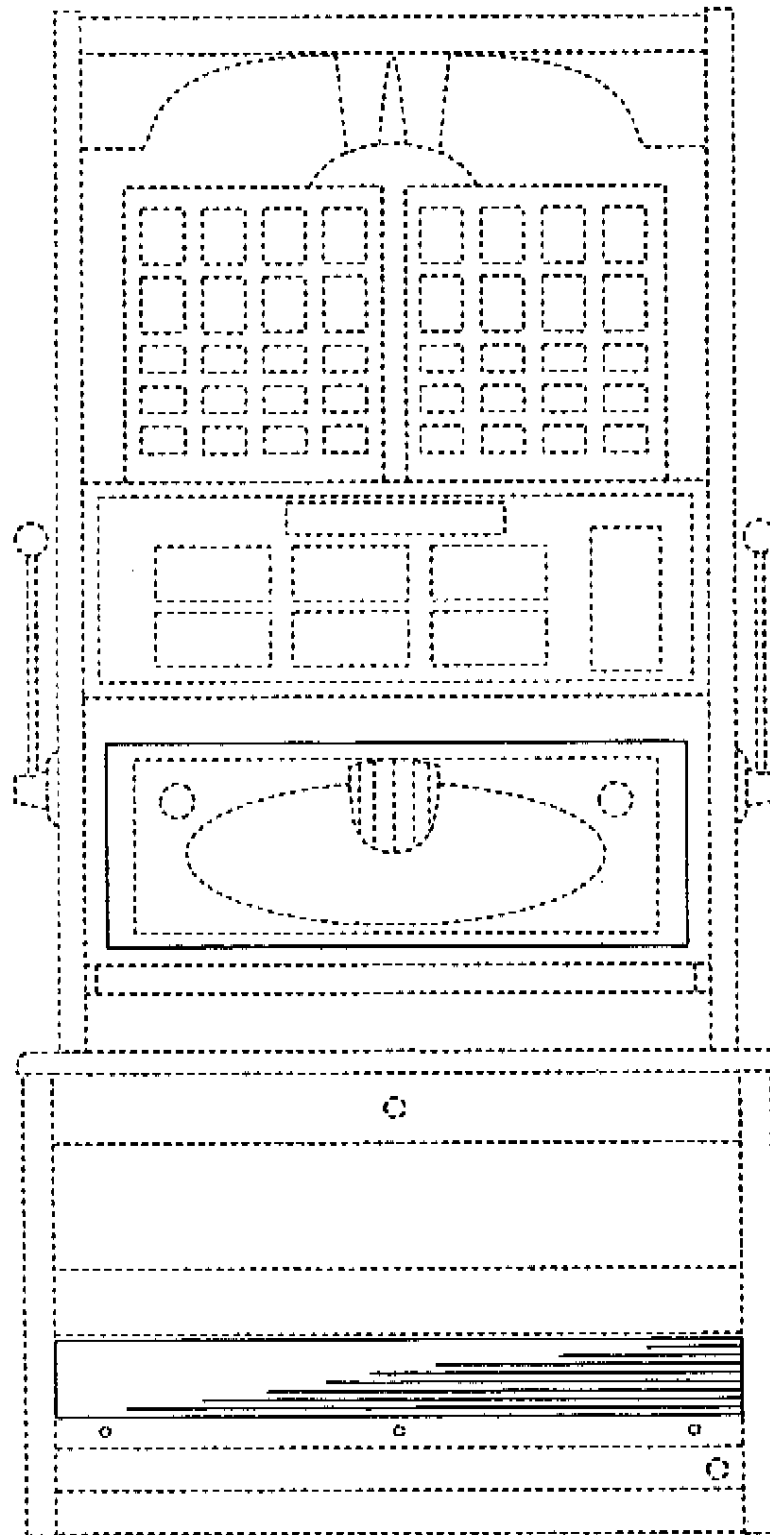


FIG. 2.

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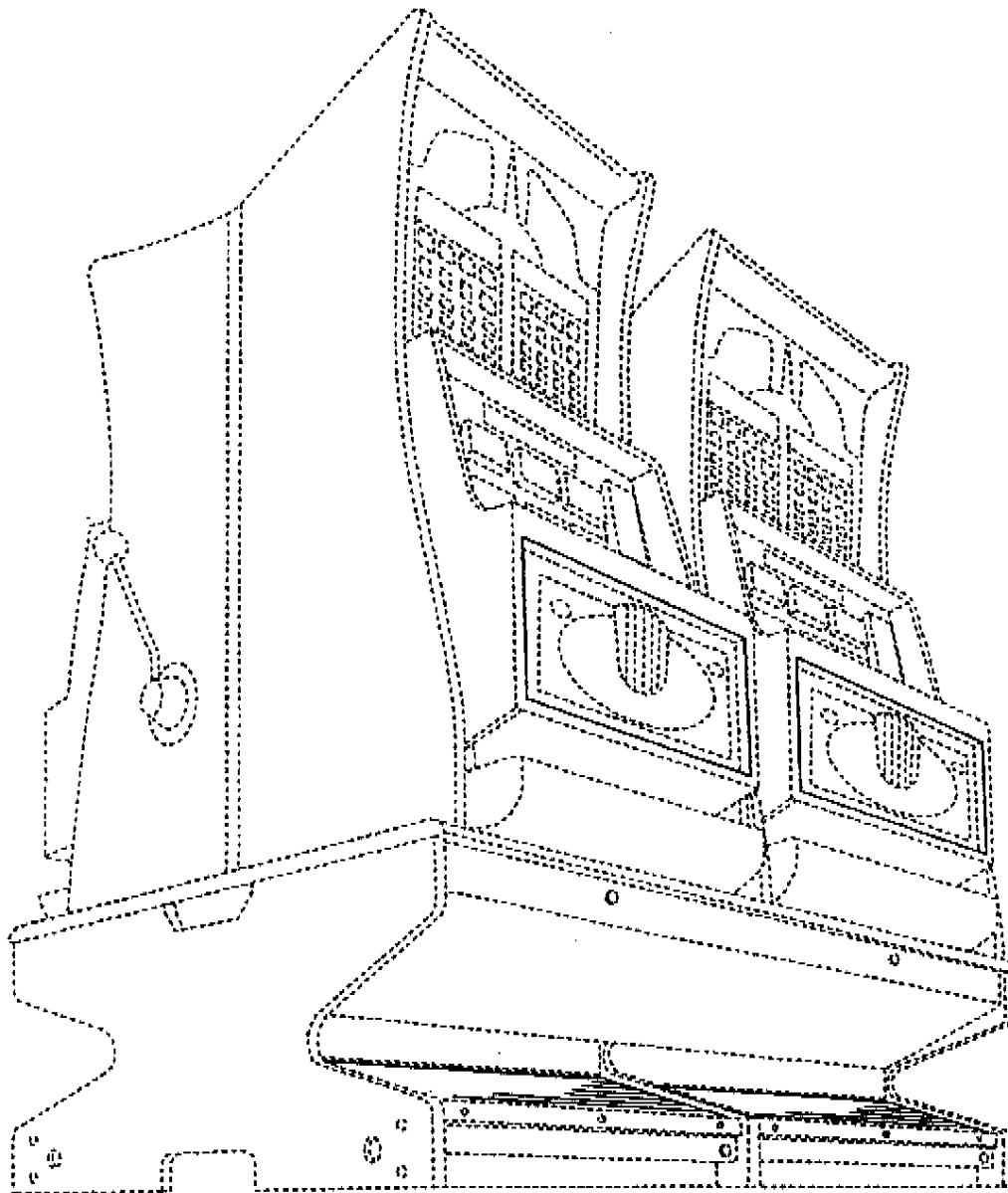


FIG. 3.

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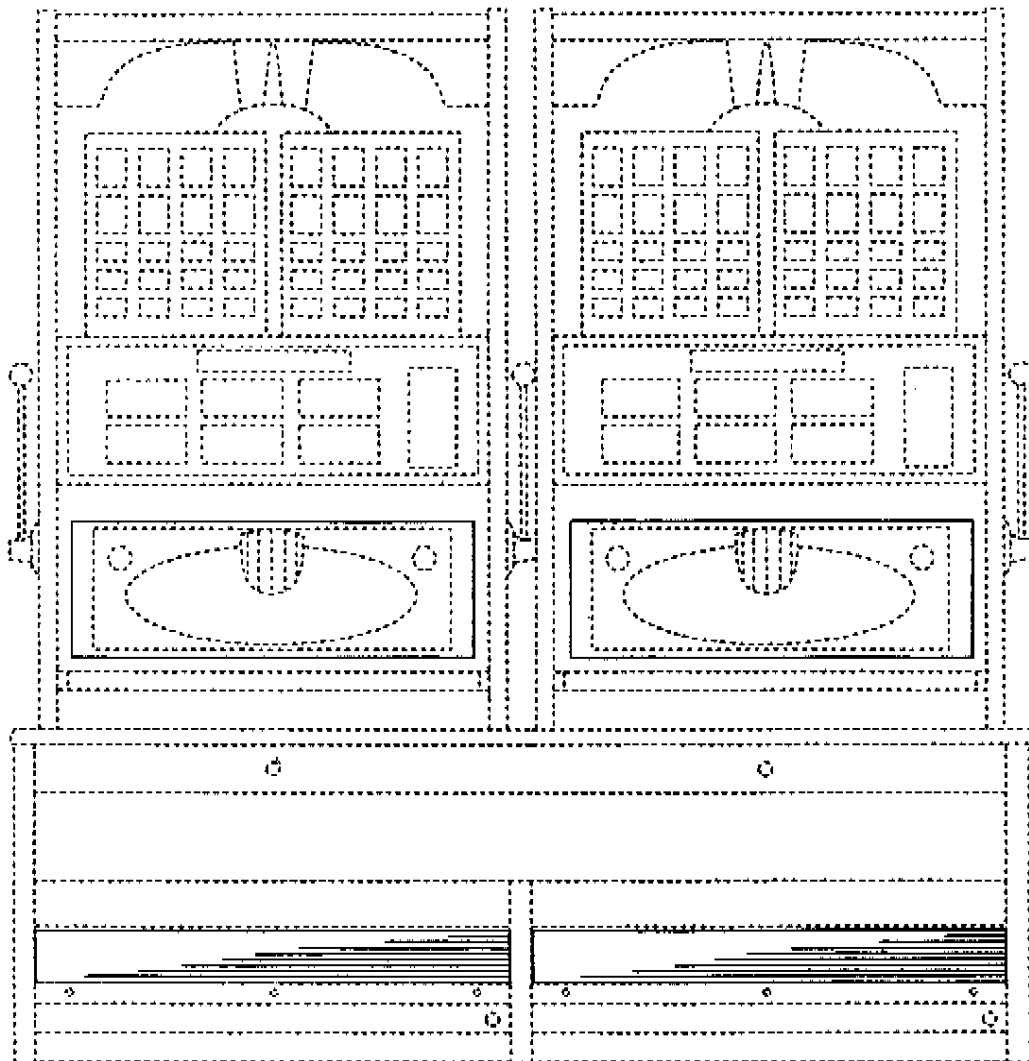


FIG. 4.