

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JUL 28 2 01 PM '00  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOSEPH KWAME OKOR, Pro Se

Plaintiff,

vs.

ATARI GAMES COR., BANDAI CO. LTD.,

CAPCOM ENTERTAINMENT INC.,

JALECO USA INC., KONAMI OF

AMERICA INC., MIDWAY GAMES INC.,

NAMCO OF AMERICA INC., SEGA

ENTERPRISES LTD., SAMMY USA CORP.,

TAITO OF AMERICA INC.

Defendants

Case No.:

**00CV11504DPW**

RECEIPT # 24181  
AMOUNT \$ 150.00  
RECEIVED BY [initials]  
LOCAL [initials]  
DATE 7-28-00

**COMPLAINT**

The plaintiff complains of defendants and alleges:

1. That the plaintiff, Joseph Kwame Okor, is a resident of Cambridge Massachusetts.
2. That on information and belief the defendant Atari Games Corporation, is a corporation of the State of California, and has a regular and established place of business at Milpitas, California, and else where in the United States, where it has committed acts of infringement complained of herein

**DOCKETED**

(1)

3. That on information and belief the defendant Bandai Co. Ltd, is a corporation of the State of California, and has a regular and established place of business at Cypress, California, and else where in the United States, where it has committed acts of infringement complained of herein
4. That on information and belief the defendant Capcom Entertainment Inc; is a corporation of the State of California, and has a regular and established place of business at Sunnyvale, California, and else where in the United States, where it has committed acts of infringement complained of herein.
5. That on information and belief the defendant Jaleco USA Inc, is a corporation of the State of Illinois, and has a regular and established place of business at Wheeling, Illinois, and else where in the United States, where it has committed acts of infringement complained of herein.
6. That on information and belief the defendant Konami of America Inc, is a corporation of the State of California, and has a regular and established place of business at Redwood City, California, and else where in the United States, where it has committed acts of infringement complained of herein
7. That on information and belief the defendant Midway Games Inc, is a corporation of the State of Illinois, and has a regular and established place of business at Chicago, Illinois, and else where in the United States, where it has committed acts of infringement complained of herein
8. That on information and belief the defendant Namco of America Inc, is a corporation of the State of California, and has a regular and established place of business at San Jose, California, and else where in the United States, where it has committed acts of infringement complained of herein.
9. That on information and belief the defendant Sammy USA Corp., is a corporation of the State of Illinois and has a regular and established place of business at San Jose, Elk Grove Village, and else where in the United States, where it has committed acts of infringement complained of herein.
10. That on information and belief the defendant Sega Enterprises Ltd. ("SEL") is a corporation organized and existing under the laws of Japan.

11. That on information and belief the defendant Sega Enterprises Inc (USA) ("SEI"), Sega of America Inc. ("SOA") are corporations of the State of California, and have regular and established place of business at San Francisco and else where in the United States. SOA and SEI are wholly owned subsidiaries of SEL. SEL through its subsidiaries SEI and SOA have committed acts of infringement complained of herein in San Francisco and else where in the United States.
12. That on information and belief the defendant Taito of America, is a corporation of the State of Illinois, and has a regular and established place of business at Wheeling, Illinois, and else where in the United States, where it has committed acts of infringement complained of herein
13. That jurisdiction is based upon the patent laws of the United States of America as set forth in U. S. Code, Title 28; Section 1338, Paragraph (a) as hereinafter appears.
14. That on November 21, 1978, United States Letters Patent No. 4,126,851 were dully and legally issued to the plaintiff as the inventor, and since that date plaintiff has been and is still the owner of such Letters Patent.
15. That the defendants, within six (6) years prior to the filling of this complaint, and within the Distinct Court of Massachusetts and elsewhere within the United States, infringed said Letters Patent by making, using and/or selling or causing to be made and used and/or sold by others, the apparatus embodying the invention or improvements described and claimed in said patent, all unlawfully and willfully and without the license or consent of plaintiff, and in infringement of said Letters Patent and the plaintiffs rights thereunder.
16. That apparatus manufactured under said Letters Patent by defendants has been extensively sold and introduced into public use and the defendants have enjoyed remarkable and outstanding commercial success therein.
17. That the plaintiff has been deprived of great gains and profits by the defendant's infringement.

Wherefore, plaintiff demands an award for general damages as due compensation for the defendants making, using, or selling the invention not less than a reasonable royalty therefore; together with such costs, and interest, as may be fixed by the court, and increase of the assessed damages to a sum not exceeding three times the amount thereof as provided by law.

Dated: July 28, 2000



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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by Priority Mail on the 29th Day of July 2000.



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Joseph Kwame Okor - Pro Se