

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

OLEG SOKOLOV

Plaintiff,

V.

LORAD CORPORATION

And

HOLOGIC, INC.

Defendants.

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) Civil Action No.:
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COMPLAINT

For his Complaint, the Plaintiff, OLEG SOKOLOV, hereby alleges the following:

THE PARTIES

1. The plaintiff, OLEG SOKOLOV, is an individual with a principal place of residence at 40 Wondy Way, Danbury, CT 06811.

2. The defendant, LORAD CORPORATION, is a corporation of the State of Connecticut having a regular and established place of business at 36 Apple Ridge Road, Danbury, CT 06810.

3. The defendant, HOLOGIC INC., is a corporation of the Commonwealth of Massachusetts having a regular and established place of business at 35 Crosby Drive, Bedford, MA 01730.

JURISDICTION AND VENUE

4. Jurisdiction of this Court with respect to the claim set forth herein arises under the patent laws of the United States, Title 35, U.S.C. Jurisdiction is founded upon 28 U.S.C. Sections 1338(a) and 1338(b). Venue is founded upon 28 U.S.C. Sections 1400(b) and 1391(c) in that the defendants either reside in and/or are doing business in this District.

FIRST COUNT - PATENT INFRINGEMENT

5. The plaintiff, OLEG SOKOLOV, is the owner of United States Letter Patent No. 5,970,118, entitled CELLULAR X-RAY GRID which was duly and legally issued by the United States Patent and Trademark Office on October 19, 1999, on an application filed by Oleg Sokolov on August 27, 1997 ("the '118 patent"). A copy of the '118 patent is attached hereto as Exhibit A.

6. The defendants have infringed the '118 patent by making, using, selling and/or offering to sell products, including but not limited to those products offered under at least the designations "High Transmission Cellular (HTC) Grid," "High Transmission Cellular (HTC) Imaging System," and/or "HTC High Transmission Cellular Grid System," covered by the claims of the '118 patent in this District and elsewhere, and will continue to do so unless enjoined therefrom by this Court.

7. The defendants have also infringed the '118 patent by contributing to the infringement of that patent by other sand/or by inducing others to infringe the '118 patent.

8. Upon information and belief, the defendants' continued infringement of the '118 patent, whether direct, contributory, and/or by inducement, has been and continues to be knowing and willful.

WHEREFORE, the plaintiff demands judgment as follows:

1. That this Court preliminarily and permanently enjoin the defendants from infringing the '118 patent as provided in 35 U.S.C. Section 283;
2. that this Court award the plaintiff an accounting of his damages resulting from said infringement as provided in 35 U.S.C. Section 284;
3. that this Court award the plaintiff treble damages as provided in 35 U.S.C. Section 284;
4. that this Court award the plaintiff his costs in this action together with reasonable attorney fees as provided in 35 U.S.C. Section 285; and
5. that the plaintiff be granted such other and further relief as is just.

Respectfully submitted,

OLEG SOKOLOV
Plaintiff

By: 

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