

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ADDICTION & DETOXIFICATION)	
INSTITUTE, LLC,)	
)	
Plaintiff,)	Civil Action No.
)	
v.)	
)	
RAPID DRUG DETOX CENTER,)	
)	
Defendant.)	

COMPLAINT FOR PATENT INFRINGEMENT

Addiction & Detoxification Institute LLC ("ADI") and for its Complaint herein against Defendant Rapid Drug Detox Center ("RDDC") states as follows:

Nature of the Lawsuit

1. By these claims, ADI seeks to redress RDDC's infringement of ADI's patent rights. In particular, RDDC has unlawfully infringed ADI's U.S. Patent Nos. 5,789,411 (the "'411 Patent") and 6,004,962 (the "'962 Patent), Exhibits 1 and 2, by using, selling, and/or offering for sale, throughout the United States, procedures and methods claimed in the '411 and/or '962 Patents in violation of ADI's rights.

The Parties

2. Plaintiff ADI is a New Jersey corporation with a principal place of business at One South Center Street, Suite 202, Merchantville, New Jersey, owns the patents in suit, the '411 and '962 Patents, being infringed by Defendant.

3. Upon information and belief, Defendant RDDC has a principal place of business at 17199 North Laurel Park Drive, Suite 405, Livonia, Michigan, 48152, and

engages in business in the State of Illinois and this judicial district including the use, marketing and sale of procedures and methods that infringe ADI's '411 and/or '962 Patents.

Jurisdiction and Venue

4. This Court has proper, original and exclusive jurisdiction over the subject matter of this action under 35 U.S.C. §§ 271 and 281, *et seq.* and 28 U.S.C. §§ 1331 and 1338.

5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 (b)-(c) and 1400 (b).

Rapid Drug Detox Center's Infringement of ADI's Patents

6. On August 4, 1998, the United States Patent Office duly and legally issued United States Patent Nos. 5,789,411 titled "Improvements to Rapid Opioid Detoxification," and 6,004,962 titled "Rapid Opioid Detoxification," copies of which are attached as Exhibits 1 and 2.

7. ADI is the assignee and owner of the Patents.

8. In violation of ADI's exclusive rights under the patent laws of the United States, RDDC has directly infringed the Patents by making, using, selling, offering for sale in the United States activities, methods and procedures claimed in the Patents, Exhibits 1 and 2.

9. ADI has induced infringement of and/or contributorily infringed the Patents.

10. By reason of RDDC's infringing activities, ADI has suffered, and will continue to suffer, substantial damages, in an amount to be proven at trial.

11. RDDC's conduct also has caused, and will continue to cause, ADI irreparable harm. RDDC's conduct is likely to continue unless it is enjoined from such conduct by this Court.

12. Upon information and belief, while RDDC has had direct knowledge of ADI's Patent Rights, it has nonetheless continued its unlawful conduct without taking reasonable precautions to avoid such infringement and, therefore, such infringement has been willful and deliberate. ADI is entitled to recover damages for its injury and RDDC's willful infringement.

Prayer for Relief

WHEREFORE, as a result of the unlawful acts of RDDC set forth herein, ADI prays for:

A. the entry of judgment that RDDC has infringed, and continues to infringe, and to contribute to and induce infringement of ADI's '411 and/or '962 Patents;

B. an injunction prohibiting RDDC and all persons in concert and participation with it, from making, using, selling, offering for sale, and importing in the United States activities that embody the invention claimed in ADI's '411 and/or '962 Patents;

C. an award of damages adequate to compensate ADI for RDDC's infringement of ADI's '411 and/or '962 Patents;

D. an award that trebles the amount of actual damages assessed against RDDC and in favor of ADI pursuant to U.S.C. § 284;

E. an award of reasonable attorney fees and costs pursuant to U.S.C. § 285;
and

F. such other and further relief as the Court may deem just and proper.

Jury Demand

ADI respectfully requests a trial by jury as to all issues so triable.

**PLAINTIFF ADDICTION &
DETOXIFICATION INSTITUTE,
LLC**

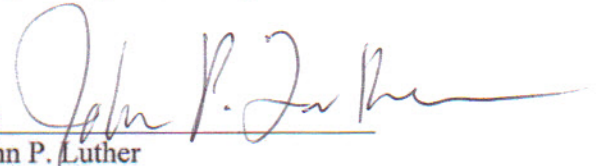
Respectfully submitted,

Date

11/9/2011

By

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