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3:03-CV-00155 POLLAK V. ALPHA IMPORTS INC

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\*CMP.\*

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FILED  
03 JAN 24 AM 11:42  
BY: [Signature]  
DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

RICHARD D. POLLAK,

Plaintiff,

vs.

ALPHA IMPORTS (NY), Inc.; LOTUS  
LAPIDARY LIMITED; PINKCITY GEM  
TECHNOLOGIES; and DOES 1 to 100,  
inclusive,

Defendants.

Case No.: No.

03 CV 0155 L (NLS)

VERIFIED COMPLAINT FOR PATENT  
INFRINGEMENT OF U.S. PATENT  
NO. 5,888,918

JURISDICTION AND VENUE

1. This action for injunctive relief and damages arises under the United States Patent Laws (35 U.S.C. Section 100, et. Seq.). This Court has jurisdiction under 28 U.S.C. Section 1338(a).

2. Venue is proper in this Judicial District under 28 U.S.C. Section 1400(b).

THE PARTIES

3. PLAINTIFF, Richard D. Pollak, is an individual residing at 3133 Via de Caballo, Encinitas, California. PLAINTIFF is the owner of United States Letters Patent No. 5,888,918 (hereinafter "the '918 patent") duly and legally issued on March 30, 1999, describing and claiming the invention of Richard D. Pollak entitled, "Method For Enhancing

1 The Color Of Minerals Useful As Gemstones." A true and correct copy of the '918 patent is  
2 attached hereto as Exhibit A.

3 4. On information and belief, Defendant Alpha Imports, Inc. (hereinafter "ALPHA") is  
4 a company organized under the laws of the State of New York, and has a place of business at 2  
5 West 46<sup>th</sup> Street, Suite 1400, New York, NY 10036.

6 5. On information and belief DEFENDANT Pinkcity Gem Technologies (hereinafter  
7 "PINKCITY") is an Indian company having its principal place of business at 76, Dhuleshwar Garden,  
8 Jaipur, India.

9 6. On information and belief DEFENDANT Lotus Lapidry Limited (hereinafter  
10 "LOTUS") is a Thai company having its principal place of business at 506 KBS Building, 30-  
11 34 Mahesak soi 3, Bangkok, 10500 Thailand. LOTUS is an affilitiate of PINKCITY  
12 advertising their products through an internet website, "Coloredtopaz.com."

13 7. PLAINTIFF is ignorant of the true names and capacities of DEFENDANTS sued  
14 herein as DOES 1 through 100, inclusive, and therefore sues these DEFENDANTS by such  
15 fictitious names. PLAINTIFF is informed and believes, and thereon alleges that, at all times  
16 herein relevant, each of the DEFENDANTS named as DOE herein has committed acts of  
17 infringement of the '918 patent within this judicial district. PLAINTIFF will amend this  
18 Complaint to allege the true names and capacities of the DOE DEFENDANTS when the names  
19 are ascertained.

20 8. Defendants ALPHA, LOTUS, and PINKCITY have committed acts of  
21 infringement, inducement to patent infringement, and contributory infringement of the '918  
22 patent in this judicial district by selling in this judicial district gemstones treated by the methods  
23 of the '918 patent.

24 9. All issues of infringement will be the same among all the named defendants.

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26 **FIRST CLAIM FOR RELIEF**  
27 (Direct Infringement of the '918 Patent)

28 10. PLAINTIFF incorporates by reference each and every allegation contained in  
29 paragraphs 1 through 9 above as though fully set forth herein.

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11. Defendant ALPHA has imported to the United States gemstones enhanced by the methods of the '918 patent, offered such gemstones for sale, and has distributed such gemstones for sale in this judicial district.

12. DEFENDANT PINKCITY has imported to the United States gemstones enhanced by the methods of the '918 patent, offered such gemstones for sale, and has distributed such gemstones for sale in this judicial district.

13. DEFENDANT LOTUS has imported to the United States gemstones enhanced by the methods of the '918 patent, offered such gemstones for sale, and has distributed such gemstones for sale in this judicial district.

14. PLAINTIFF has given due and actual notice to Defendants ALPHA, LOTUS, and PINKCITY that the acts alleged above constitute infringement of the '918 patent.

15. PLAINTIFF has demanded that Defendants ALPHA, LOTUS, and PINKCITY cease and desist such acts of infringement or acquire a license under the '918 patent and to pay damages for infringement of the '918 patent. Defendants ALPHA, LOTUS, and PINKCITY have refused to acquire a license and to pay damages to PLAINTIFF for past infringement.

16. The acts described in paragraphs 10 through 13 above by Defendants ALPHA, LOTUS, and PINKCITY constitute direct infringement of the '918 patent in violation of Section 271 (a) of Title 35, United States Code.

17. Upon information and belief, the acts of infringement of the '918 patent under Section 271 (a) by Defendants ALPHA, LOTUS, and PINKCITY are willful, wanton and deliberate, without license and with full knowledge of PLAINTIFF's rights.

**SECOND CLAIM FOR RELIEF**  
(Inducement to Infringement of the '918 patent)

18. PLAINTIFF incorporates by reference in this claim for relief the averments contained in paragraphs 1 through 17 above.

19. The acts of Defendants ALPHA, LOTUS, and PINKCITY described in paragraphs 10 through 17 above constitute inducement to infringement of the '918 patent in violation of Section 271 (b) of Title 35, United States Code.

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20. Upon information and belief, the acts of infringement of the '918 patent under Section 271 (b) by Defendants ALPHA, LOTUS, and PINKCITY are willful, wanton and deliberate, without license and with full knowledge of PLAINTIFF's rights.

**THIRD CLAIM FOR RELIEF**  
(Contributory Infringement of the '918 patent)

21. PLAINTIFF incorporates by reference in this claim for relief the averments contained in paragraphs 1 through 20 above.

22. The acts of Defendants ALPHA, LOTUS, and PINKCITY described in paragraphs 10 through 20 above constitute contributory infringement of the '918 patent in violation of Section 271 (c) of Title 35, United States Code.

23. Upon information and belief, the acts of infringement of the '918 patent under Section 271 (c) by Defendants ALPHA, LOTUS, and PINKCITY are willful, wanton and deliberate, without license and with full knowledge of PLAINTIFF's rights.

**PRAYER FOR RELIEF**

1. That Defendants ALPHA, LOTUS, and PINKCITY be adjudged to have caused the infringement the '918 patent.

2. An adjudication that this is an "exceptional case" in that Defendants ALPHA, LOTUS, and PINKCITY did willfully and deliberately infringe, and caused the infringement of, the '918 patent.

3. That Defendants ALPHA, LOTUS, and PINKCITY, their officers, agents, servants, employees and attorneys, and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, be preliminary and permanently restrained and enjoined from further infringing, and inducing the infringement of, the '918 patent.

4. That Defendants ALPHA, LOTUS, and PINKCITY, and their officers, agents, servants, employees and attorneys, and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, be preliminary and

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1 permanently restrained and enjoined from further contributing to the infringement of the '918  
2 patent.

3 5. An accounting for damages by virtue of the infringement of the '918 patent by  
4 Defendants ALPHA, LOTUS, and PINKCITY, and for trebling of such damages, together with  
5 an award of such damages, all in accordance with 35 U.S.C. Section 284.

6 6. An assessment of prejudgment and post-judgment interest and costs against  
7 Defendants ALPHA, LOTUS, and PINKCITY, together with an award of such interest and  
8 costs, all in accordance with 35 U.S.C. Section 285 and for the award of reasonable attorney fees  
9 pursuant thereto.

10 7. An award of such other and further relief as this Court may deem just and proper.

11  
12 Respectfully submitted,

13  
14 DATED 1/24/03 By: Don E. Erickson

15 Don E. Erickson  
16 Attorney for PLAINTIFF  
17 Richard D. Pollak  
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VERIFICATION

I, Richard D. Pollak, declare under penalty of perjury that the following statements are true:

1. I am the inventor and owner of the United States Letters Patent No. 5,888,918.
2. I have read the foregoing complaint.
3. To the best of my knowledge, information and belief founded after reasonable inquiry, this complaint is well founded in fact and is warranted by existing law or a good faith argument for the extension, modification, or reversing of existing law.
4. This complaint is not being filed for any improper purpose.

Dated: \_\_\_\_\_

1/24/03



Richard D. Pollak

RECYCLED PAPER MADE FROM 20% POST CONSUMER CONTENT







US005888918A

**United States Patent** [19][11] **Patent Number:** 5,888,918

Pollak

[45] **Date of Patent:** \*Mar. 30, 1999[54] **METHOD FOR ENHANCING THE COLOR OF MINERALS USEFUL AS GEMSTONES**[76] **Inventor:** Richard Pollak, 3133 Via de Caballo, Encinitas, Calif. 92024[ \* ] **Notice:** This patent issued on a continued prosecution application filed under 37 CFR 1.53(d), and is subject to the twenty year patent term provisions of 35 U.S.C. 154(a)(2).[21] **Appl. No.:** 845,709[22] **Filed:** Apr. 25, 1997[51] **Int. Cl.<sup>o</sup>** ..... C30B 29/00; A44C 17/00; B05D 1/12; B05D 3/02[52] **U.S. Cl.** ..... 501/86; 427/180; 427/190; 427/191; 427/217; 427/383.1; 427/383.3; 63/32; 428/426; 428/432[58] **Field of Search** ..... 427/180, 190, 427/191, 217, 383.1, 383.3; 501/86; 428/426, 432, 539.5; 63/32[56] **References Cited****U.S. PATENT DOCUMENTS**

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*Primary Examiner*—Shrive Beck*Assistant Examiner*—Michael Barr*Attorney, Agent, or Firm*—Gray Cary Ware & Freidenrich; Stephen E. Reiter[57] **ABSTRACT**

In accordance with the present invention, there are provided methods for enhancing the color of minerals useful as gemstones. Invention methods are relatively inexpensive to carry out, avoid the use of hazardous materials, and require no specialized equipment.

**20 Claims, No Drawings**

5,888,918

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Gemstones treated according to the present invention can be used directly, or they can be subjected to further treatment and/or washing conditions. It is presently preferred that the treated gemstone be cleaned after being subjected to said conditions suitable to enhance the color of a gemstone. Such cleaning can be accomplished in a variety of ways, e.g., by washing the treated gemstones with aqueous media or with organic solvents (e.g., acetone), by wiping the gemstones with a soft cloth (e.g., a polishing cloth), by polishing the surface of the gemstones with a suitable abrasive, and the like.

In accordance with another embodiment of the present invention, there are provided color enhanced gemstones having a color enhancing agent diffused into the outer surface thereof. Color enhancing agents contemplated include the treating agents described hereinabove.

In accordance with yet another embodiment of the present invention, there are provided color enhanced gemstones wherein at least the surface of said gemstone has chemically bonded thereto a color enhancing agent. Color enhancing agents contemplated include the treating agents described hereinabove.

The invention will now be described in greater detail by reference to the following non-limiting examples.

#### EXAMPLE 1

##### Optional Cleaning Process

It is presently preferred that gemstones treated in accordance with the present invention be cleaned as follows. First the stones are treated in gently boiling distilled water containing a small amount of detergent for at least about 12 hours. Once cooled, the stones are then washed with distilled water until all traces of detergent are removed.

The stones are then soaked at room temperature (or above) in a 1:1 aqueous dilution of concentrated nitric acid for about two hours, or more. The stones are then rinsed thoroughly with distilled water. The stones are then rinsed with acetone, then rinsed again with distilled water, and dried.

#### EXAMPLE 2

##### General Treatment Protocol

To achieve color enhancement according to the invention, gemstones are placed in a suitable vessel which can withstand the exposure temperatures contemplated for use (e.g., a flat ceramic sheet, a crucible, and the like) and completely surrounded by the treating agent(s) of choice. The vessel is then placed in a furnace capable of reaching and accurately maintaining temperatures in the range of about 900° up to about 1800° C. The furnace is then heated to the desired temperature and maintained at that temperature for the desired length of time. Once the desired time and temperature requirements have been satisfied, the furnace is cooled down and the vessel containing the gemstones is removed therefrom.

After the treated gemstones have cooled, they are separated from the treating agent. In many instances, the treated stones need only be wiped clean with a soft cloth or tissue. In some circumstances (e.g., where the stones are subjected to particularly rigorous treating conditions or where relatively soft stones are treated), it may be desirable to subject the stone to a nitric acid bath to clean the surface of the stone. When such treatment is indicated, concentrated nitric acid solutions or various dilutions thereof can be used.

#### EXAMPLE 3

##### Treatment of Topaz

Topaz can be treated with powdered cobalt metal or cobalt oxide to achieve a variety of enhanced colors. For example,

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treatment at 900° C. for about 24 hours results in very light blue stones. Treatment at higher temperature (e.g., 1046° C.) for about 24 hours results in much darker blue or blue-green stones. Thus, it is seen that the final color of the treated stone can be controlled by proper selection of treating conditions.

Once topaz is treated with powdered cobalt metal or cobalt oxide as described above to achieve a green-blue or blue-green stone, the color imparted to the stone can be further modified by subjecting the stones to additional furnace heating as described above, but in the absence of treating agent. In this way, the color of the stone can be shifted to blue.

#### EXAMPLE 4

##### Treatment of Chrysoberyl

Chrysoberyl is subjected to the same process as described in Example 3. Since the most common color for chrysoberyl is light yellow, the color of the treated stone tends to be yellow-green to blue-green, depending upon the time and temperature of exposure. If a colorless chrysoberyl is used in the process, the enhanced color imparted by treatment with powdered cobalt metal or cobalt oxide is blue.

#### EXAMPLE 5

##### Treatment of Sapphire

Sapphire is subjected to the same process as described in Example 3. Care should be taken in selecting the temperature to which the stones are heated, as sapphires tend to develop surface damage when subjected to excessive temperatures. In the event surface damage does occur, the treated stones can be repolished, producing an intensely colored finished product.

The color of the treated stone can vary substantially. For example, a colorless sapphire produces a light blue to dark blue treated stone, depending upon the original color of the sapphire. A yellow sapphire will produce a green, yellow-green to blue-green stone, depending upon the time and temperature of exposure. If a colorless chrysoberyl is used in the process, the enhanced color imparted by treatment with powdered cobalt metal or cobalt oxide is blue.

#### EXAMPLE 6

##### Treatment of Quartz

Quartz is subjected to the same process as described in Example 3. Care should be taken in selecting the temperature to which the stones are heated, as quartz tends to develop surface damage when subjected to excessive temperatures. In the event surface damage does occur, the treated stones can be repolished, producing a smooth, colored finished product.

The color of the treated stone can vary substantially, with the invention process typically producing stones which are light to dark pink.

#### EXAMPLE 7

##### Treatment of Garnet

Garnet is subjected to the same process as described in Example 3. The color of the treated stone can vary substantially, with the invention process typically producing stones which are green to blue-green when light yellow grossular garnet is used.

While the invention has been described in detail with reference to certain preferred embodiments thereof, it will be understood that modifications and variations are within the spirit and scope of that which is described and claimed.

That which is claimed is:

1. A method for enhancing the color of gemstone(s), said method comprising: subjecting a combination of a gemstone

AO 120 (3/85)

<b>TO:</b> <b>Commissioner of Patents and Trademarks</b> <b>Washington, D.C. 20231</b>	<b>REPORT ON THE</b> <b>FILING OR DETERMINATION OF AN</b> <b>ACTION REGARDING A PATENT</b>
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In compliance with the Act of July 19, 1952 (66 Stat. 814; 35 U.S.C. 290) you are hereby advised  
that a court action has been filed on the following patent(s) in the U.S. District Court:

DOCKET NO.	DATE FILED	U.S. DISTRICT COURT
03cv155L(NLS)	1/24/03	United States District Court, Southern District of California
PLAINTIFF		DEFENDANT
Richard D. Pollak,		Alpha Imports (NY), Inc. Et al.
PATENT NO.	DATE OF PATENT	PATENTEE
1 5,888,918	3/30/99	Richard Pollak
2		
3		
4		
5		

In the above-entitled case, the following patent(s) have been included:

DATE INCLUDED	INCLUDED BY		
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading
PATENT NO.	DATE OF PATENT	PATENTEE	
1			
2			
3			
4			
5			

In the above-entitled case, the following decision has been rendered or judgment issued:

DECISION/JUDGMENT		
CLERK	(BY) DEPUTY CLERK	DATE

Copy 1 - Upon initiation of action, mail this copy to Commissioner Copy 3 - Upon termination of action, mail this copy to Commissioner  
Copy 2 - Upon filing document adding patent(s), mail this copy to Commissioner Copy 4 - Case file copy

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

*Richard D. Pollak*

(b) County of Residence of First Listed Plaintiff San Diego  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

*Don E. Erickson 858-350-1308*  
*Law Office, PMB 182*  
*3830 Valley Center Dr. #705, San Diego, CA 92138*

## DEFENDANTS

*Alpha Imports Corp, Inc;*  
*Lotus Lepidary Limited;*  
*Pinkeye Technologies*

County of Residence of First Listed Defendant New York  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

BY:

DEPUTY

Attorneys (If Known)

**'03 CV 0155 L (NLS)**

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☐ 1 ☐ 1 DEF Incorporated or Principal Place of Business In This State ☐ 4 ☐ 4 DEF
- Citizen of Another State ☐ 2 ☐ 2 DEF Incorporated and Principal Place of Business In Another State ☐ 5 ☐ 5 DEF
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 DEF Foreign Nation ☐ 6 ☐ 6 DEF

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

## V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

(Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

*Patent Infringement 28.1338pt 35 U.S.C. 271(a)-(c)*

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

*Ruben B. Brooks*

DOCKET NUMBER

*02CV 0137 K*

DATE

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT # *90719* AMOUNT *150.00* APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

*1/24/03 RB*