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CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
Tampa Division

WALKER MARKETING, INC.,

and

WALKER TOOL & MOLD, INC.
3146 Edgemoor Dr.
Palm Harbor, FL 34685

Plaintiffs,

v.

CALICO LABORATORIES, INC.,

and

JONEL, INC.,

and

WALGREEN CO.

and

WALGREENS.COM, INC.

Defendants.

Civil Action No.
8:02-CV-0367-T-27TBM

FIRST AMENDED
COMPLAINT

**FIRST AMENDED
COMPLAINT FOR DAMAGES AND FOR INJUNCTIVE RELIEF**

COME NOW the Plaintiffs, WALKER MARKETING, INC., and WALKER
TOOL & MOLD, INC., by and through undersigned counsel, and for their **First
Amended Complaint¹** against the Defendants herein states as follows:

¹ This Amended Complaint is filed as of right pursuant to Fed. R. Civ. P. Rule 15(a), no responsive pleading having been served. Material additions are in bold type.

PARTIES, JURISDICTION AND VENUE

1. Plaintiff WALKER MARKETING, INC. (hereinafter "WMI") is a corporation organized and operating under the laws of the State of Florida with a principal place of business in this State, District and Division.

1.5 Plaintiff WALKER TOOL & MOLD, INC. (hereinafter "WTM") is a corporation organized and operating under the laws of the State of Florida with a principal place of business in this State, District and Division.

2. Defendant CALICO LABORATORIES, INC. (hereinafter "Calico") is a corporation organized and operating under the laws of the State of Missouri with a principal place of business in Missouri and doing business in the State of Florida and in this District.

3. Defendant JONEL, INC. (hereinafter "Jonel") is a corporation organized and operating under the laws of the State of Illinois with a principal place of business in Illinois and doing business in the State of Florida and in this District.

4. Defendant WALGREEN CO. (hereinafter "Walgreen") is a corporation organized and operating under the laws of the State of Illinois with a principal place of business in Illinois and doing business in the State of Florida and in this District.

5. Defendant WALGREENS.COM, INC. (hereinafter "Walgreens.com") is a corporation organized and operating under the laws of the State of Illinois with a principal place of business in Illinois and doing business in the State of Florida and in this District.

6. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 (federal question) and 1338 (patents and unfair competition), under the Patent Act, 35 U.S.C. § 101 *et seq.*, and the Lanham Act, 15 U.S.C. § 1125 *et seq.*

7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400 because Plaintiffs' claim arose in this District and the Defendants are subject to personal jurisdiction and have committed acts of infringement and unfair competition in this District.

BACKGROUND

8. Plaintiff WMI is the owner by assignment of U.S. Patent No. 4,819,672 (“the ‘672 patent”) for “Nail Polish Remover Container,” issued to inventor Alvin M. Walker. The inventor, Alvin M. Walker, is the president of WMI.

9. Plaintiff WMI is the owner of the entire right, title and interest in and to the ‘672 patent, which was duly and legally issued on April 11, 1989, and which patent is in full force and effect and which has a *prima facie* presumption of validity.

9.5 Plaintiff WTM is the exclusive licensee of the ‘672 patent. WTM manufactures and sells product as described in the ‘672 patent.

10. The product manufactured from the ‘672 patent (the “artificial nail remover product”) has met with commercial success in the marketplace.

11. Plaintiff WMI has licensed the ‘672 patent and the artificial nail remover product to **WTM which has** commercially exploited it in the marketplace.

12. Plaintiff WMI has not permitted, authorized, consented or licensed the ‘672 patent for the artificial nail remover product at issue to any of the Defendants. **Defendant Calico was formerly impliedly sublicensed by WTM to assemble**

products in accordance with the '672 Patent to the extent that such products were assembled using a brush component sold by WTM and marked with the number of the '672 Patent. In or about 2000, Calico ceased purchasing the brush components from WTM and began manufacturing them itself without the permission or license of WMI or WTM.

13. Defendant Calico is and has been manufacturing, selling, using, and/or importing a product in this District and throughout the United States under the name "Polish Off," which falsely states on the label "Licensed under: Patent No. ... 4,819,672," and which infringes the '672 patent.

14. This manufacture, sale, use, and or importation by Defendant Calico is without the permission, authorization, consent or license of the Plaintiff.

15. Defendant Jonel is manufacturing, selling, using, and/or importing a product in this District and throughout the United States under the name "Tip-Off," which wrongfully states on the label "Patent No. 4,819,672," and which infringes the '672 patent.

16. This manufacture, sale, use, and or importation by Defendant Jonel is without the permission, authorization, consent or license of the Plaintiff.

17. Defendant Walgreen is advertising, selling, using, and/or importing in this District and throughout the United States Jonel's "Tip-Off" product, which has the '672 patent mismarked on the label, and which infringes the '672 patent.

18. Defendant Walgreens.com is advertising, selling, using, and/or importing in this District and throughout the United States Jonel's "Tip-Off" product, which has the '672 patent mismarked on the label, and which infringes the '672 patent.

18.5 The sale of the brush components marked with the number of the '672 patent was with the express understanding that such components were being assembled into products of a functionally-similar configuration to those of WTM and in accordance with the '672 patent, and for that sole purpose. At no time were the brush components sold to anyone for any use other than incorporation into a product in accordance with the '672 patent.

COUNT I
(PATENT INFRINGEMENT BY DEFENDANT CALICO)

19. The Plaintiffs repeats and realleges paragraphs 1 through 18.5 as if fully incorporated herein

20. Defendant Calico has been infringing, contributorily infringing, and/or inducing infringement of the '672 patent during the term thereof by using, making, offering for sale, and/or selling in the United States, and/or importing into the United States, the device as claimed by the '672 Patent.

21. In particular, but without limitation, Defendant Calico has infringed the '672 patent by manufacturing and/or selling the "Polish Off" product in this District and throughout the United States, without the permission, authorization, consent or license of the Plaintiffs.

22. Said infringement has resulted and continues to result in damage to the Plaintiffs.

23. Defendant Calico has been given actual or constructive notice of the '672 patent.

24. Defendant Calico has wantonly and willfully infringed the '672 patent and will continue to infringe the patent unless enjoined by this Court.

25. Defendant Calico has unlawfully derived gains and profits by such infringement, and has caused damage to Plaintiffs and will cause further cause irreparable damage to Plaintiffs unless enjoined by this Court.

26. The Plaintiffs are entitled to recover damages equaling three times their actual damages as the result of the infringement described herein.

27. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT II
(PATENT INFRINGEMENT BY DEFENDANT JONEL)

28. The Plaintiffs repeat and reallege paragraphs 1 through 27 as if fully incorporated herein

29. Defendant Jonel has been infringing, contributorily infringing, and/or inducing infringement of the '672 patent during the term thereof by using, making, offering for sale, and/or selling in the United States, and/or importing into the United States, the device as claimed by the '672 Patent.

30. In particular, but without limitation, Defendant Jonel has infringed the '672 patent by manufacturing and/or selling the "Tip-Off" product in this District and throughout the United States, without the permission, authorization, consent or license of the Plaintiffs.

31. Said infringement has resulted and continues to result in damage to the Plaintiffs.

32. Defendant Jonel has been given actual or constructive notice of the '672 patent.

33. Defendant Jonel has wantonly and willfully infringed the '672 patent and will continue to infringe the patent unless enjoined by this Court.

34. Defendant Jonel has unlawfully derived gains and profits by such infringement, and has caused damage to Plaintiffs and will cause further irreparable damage to Plaintiffs unless enjoined by this Court.

35. The Plaintiffs are entitled to recover damages equaling three times their actual damages as the result of the infringement described herein.

36. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT III
(PATENT INFRINGEMENT BY DEFENDANT WALGREEN)

37. The Plaintiffs repeat and reallege paragraphs 1 through 36 as if fully incorporated herein

38. Defendant Walgreen has been infringing, contributorily infringing, and/or inducing infringement of the '672 patent during the term thereof by using, making, offering for sale, and/or selling in the United States, and/or importing into the United States, the device as claimed by the '672 Patent.

39. In particular, but without limitation, Defendant Walgreen has infringed the '672 patent by selling, using, and/or importing the Jonel "Tip-Off" product in this District and throughout the United States without the permission, authorization, consent or license of the Plaintiffs.

40. Said infringement has resulted and continues to result in damage to the Plaintiffs.

41. Defendant Walgreen has been given actual or constructive notice of the '672 patent.

42. Defendant Walgreen has wantonly and willfully infringed the '672 patent and will continue to infringe the patent unless enjoined by this Court.

43. Defendant Walgreen has unlawfully derived gains and profits by such infringement, and has caused damage to Plaintiffs and will cause further cause irreparable damage to Plaintiffs unless enjoined by this Court.

44. The Plaintiffs are entitled to recover damages equaling three times their actual damages as the result of the infringement described herein.

45. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT IV
(PATENT INFRINGEMENT BY DEFENDANT WALGREENS.COM)

46. The Plaintiffs repeat and reallege paragraphs 1 through 45 if fully incorporated herein

47. Defendant Walgreens.com has been infringing, contributorily infringing, and/or inducing infringement of the '672 patent during the term thereof by using, making, offering for sale, and/or selling in the United States, and/or importing into the United States, the device as claimed by the '672 Patent.

48. In particular, but without limitation, Defendant Walgreens.com has infringed the '672 patent by selling, using, and/or importing the Jonel "Tip-Off" product in this

District and throughout the United States without the permission, authorization, consent or license of the Plaintiffs.

49. Said infringement has resulted and continues to result in damage to the Plaintiffs.

50. Defendant Walgreens.com has been given actual or constructive notice of the '672 patent.

51. Defendant Walgreens.com has wantonly and willfully infringed the '672 patent and will continue to infringe the patent unless enjoined by this Court.

52. Defendant Walgreens.com has unlawfully derived gains and profits by such infringement, and has caused damage to Plaintiffs and will cause further cause irreparable damage to Plaintiffs unless enjoined by this Court.

53. The Plaintiffs are entitled to recover damages equaling three times their actual damages as the result of the infringement described herein.

54. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT V
(PATENT MISMARKING BY DEFENDANT CALICO)

55. The Plaintiff **WMI** repeats and realleges paragraphs 1 through 54 as if fully incorporated herein

56. The Defendant Calico has been intentionally mismarking its "Polish Off" products in this District and throughout the United States, with the patent number of the '672 patent without the consent of the Plaintiff.

57. Said mismarking is in violation of 35 U.S.C. § 292 since the Defendant Calico marked upon, affixed to, or used in advertising, the mismarked patent number of

the '672 patent in connection with the "Polish Off" product without the consent of the Plaintiff and with the intent of deceiving the public and inducing them to believe that the product was made or sold by or with the consent of the Plaintiff.

58. Defendant Calico has been given actual or constructive notice of the '672 patent, and has actual knowledge that it does not have the consent of the Plaintiff to mark its products with the '672 patent number.

59. Defendant Calico has wantonly, willfully and intentionally mismarked the "Polish Off" product in this District and throughout the United States, with the patent number of the '672 patent, without the consent of the Plaintiff.

60. Defendant Calico has unlawfully derived gains and profits by such mismarking and has caused damage to Plaintiffs and will cause further cause irreparable damage to Plaintiff unless enjoined by this Court.

61. The Plaintiff is entitled to recover on its own behalf and that of the United States a statutory penalty of up to \$500.00 for every mismarking offense committed by the said Defendant.

62. This being an exceptional case, Plaintiff is entitled to an award of attorneys' fees.

COUNT VI
(PATENT MISMARKING BY DEFENDANT JONEL)

63. The Plaintiff **WMI** repeats and realleges paragraphs 1 through 62 as if fully incorporated herein

64. The Defendant Jonel has been intentionally mismarking its "Tip-Off" products in this District and throughout the United States, with the patent number of the '672 patent without the consent of the Plaintiff.

65. Said mismarking is in violation of 35 U.S.C. § 292 since the Defendant Jonel marked upon, affixed to, or used in advertising, the mismarked patent number of the '672 patent in connection with the "Tip-Off" product without the consent of the Plaintiff and with the intent of deceiving the public and inducing them to believe that the product was made or sold by or with the consent of the Plaintiff.

66. Defendant Jonel has been given actual or constructive notice of the '672 patent, and has actual knowledge that it does not have the consent of the Plaintiff to mark its product with the '672 patent number.

67. Defendant Jonel has wantonly, willfully and intentionally mismarked the "Tip-Off" product in this District and throughout the United States, with the patent number of the '672 patent, without the consent of the Plaintiff.

68. Defendant Jonel has unlawfully derived gains and profits by such mismarking and has caused damage to Plaintiffs and will cause further cause irreparable damage to Plaintiff unless enjoined by this Court.

69. The Plaintiff is entitled to recover on its own behalf and that of the United States a statutory penalty of up to \$500.00 for every mismarking offense committed by the said Defendant.

70. This being an exceptional case, Plaintiff is entitled to an award of attorneys' fees.

COUNT VII
(UNFAIR COMPETITION BY DEFENDANT CALICO)

71. The Plaintiffs repeat and reallege paragraphs 1 through 70 as if fully incorporated herein

72. Defendant Calico, on or in connection with its goods, including the "Polish Off" product, used and continues to use in commerce, words, terms, and devices, or a combination thereof, false designations of origin, and/or false or misleading descriptions or representations of fact, that are likely to cause, and on information and belief have in fact caused, confusion or mistake, and/or to deceive as to its affiliation, connection, and/or association with Plaintiffs, or as to the origin, sponsorship, or approval by Plaintiffs of its goods.

73. Said actions constitute violations of the Lanham Act, 15 U.S.C. § 1125(a).

74. As a direct and proximate result of Defendant Calico's false descriptions, representations and designations of origin, Plaintiffs have suffered and continue to suffer damages, including but not limited to lost profits and lost goodwill.

75. Defendant Calico has unlawfully derived gains and profits by such mismarking and unfair competition and has caused damage to Plaintiffs and will further cause irreparable damage to Plaintiffs unless enjoined by this Court.

76. Pursuant to 15 U.S.C. § 1117(a), Defendant Calico is liable to Plaintiffs for three times the damages Plaintiffs have sustained as a consequence of Defendant's violation of § 1125(a) and/or Defendant's profits, and the costs of this action.

77. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT VIII
(UNFAIR COMPETITION BY DEFENDANT JONEL)

78. The Plaintiffs repeat and reallege paragraphs 1 through 77 as if fully incorporated herein.

79. Defendant Jonel, on or in connection with its goods, including the "Tip-Off" product, used and continues to use in commerce, words, terms, and devices, or a combination thereof, false designations of origin, and/or false or misleading descriptions or representations of fact, that are likely to cause, and on information and belief have in fact caused, confusion or mistake, and/or to deceive as to its affiliation, connection, and/or association with Plaintiff, or as to the origin, sponsorship, or approval by Plaintiffs of its goods.

80. Said actions constitute violations of the Lanham Act, 15 U.S.C. § 1125(a).

81. As a direct and proximate result of Defendant Jonel's false descriptions, representations and designations of origin, Plaintiffs have suffered and continue to suffer damages, including but not limited to lost profits and lost goodwill.

82. Defendant Jonel has unlawfully derived gains and profits by such mismarking and unfair competition and has caused damage to Plaintiffs and will further cause irreparable damage to Plaintiffs unless enjoined by this Court.

83. Pursuant to 15 U.S.C. § 1117(a), Defendant Jonel is liable to Plaintiffs for three times the damages Plaintiffs have sustained as a consequence of Defendant's violation of § 1125(a) and/or Defendant's profits, and the costs of this action.

84. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT IX
(UNFAIR COMPETITION BY DEFENDANT WALGREEN)

85. The Plaintiffs repeat and reallege paragraphs 1 through 84 as if fully incorporated herein

86. Defendant Walgreen, on or in connection with its goods, including the Jonel "Tip-Off" product, used and continues to use in commerce, words, terms, and devices, or a combination thereof, false designations of origin, and/or false or misleading descriptions or representations of fact, that are likely to cause, and in fact have caused, confusion or mistake, and/or to deceive as to its affiliation, connection, and/or association with Plaintiffs, or as to the origin, sponsorship, or approval by Plaintiff of its goods.

87. Said actions constitute violations of the Lanham Act, 15 U.S.C. § 1125(a).

88. As a direct and proximate result of Defendant Walgreen's false descriptions, representations and designations of origin, Plaintiffs have suffered and continue to suffer damages, including but not limited to lost profits and lost goodwill.

89. Defendant Walgreen has unlawfully derived gains and profits by such mismarking and unfair competition and has caused damage to Plaintiffs and will further cause irreparable damage to Plaintiffs unless enjoined by this Court.

90. Pursuant to 15 U.S.C. § 1117(a), Defendant Walgreen is liable to Plaintiffs for three times the damages Plaintiffs have sustained as a consequence of Defendant's violation of § 1125(a) and/or Defendant's profits, and the costs of this action.

91. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT X
(UNFAIR COMPETITION BY DEFENDANT WALGREENS.COM)

92. The Plaintiffs repeat and reallege paragraphs 1 through 91 as if fully incorporated herein

93. Defendant Walgreens.com, on or in connection with its goods, including the Jonel "Tip-Off" product, used and continues to use in commerce, words, terms, and

devices, or a combination thereof, false designations of origin, and/or false or misleading descriptions or representations of fact, that are likely to cause, and in fact have caused, confusion or mistake, and/or to deceive as to its affiliation, connection, and/or association with Plaintiff, or as to the origin, sponsorship, or approval by Plaintiffs of its goods.

94. Said actions constitute violations of the Lanham Act, 15 U.S.C. § 1125(a).

95. As a direct and proximate result of Defendant Walgreens.com's false descriptions, representations and designations of origin, Plaintiffs have suffered and continue to suffer damages, including but not limited to lost profits and lost goodwill.

96. Defendant Walgreens.com has unlawfully derived gains and profits by such mismarking and unfair competition and has caused damage to Plaintiffs and will further cause irreparable damage to Plaintiffs unless enjoined by this Court.

97. Pursuant to 15 U.S.C. § 1117(a), Defendant Walgreens.com is liable to Plaintiffs for three times the damages Plaintiffs have sustained as a consequence of Defendant's violation of § 1125(a) and/or Defendant's profits, and the costs of this action.

98. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

COUNT XI
(DECLARATORY JUDGMENT AS TO DEFENDANT CALICO)

99. The Plaintiffs repeat and reallege paragraphs 1 through 98 as if fully incorporated herein.

100. On April 26, 2002, Defendant Calico filed against WMI in the Eastern District of Missouri an Amended Complaint asserting that WMI engaged in "False Marking" under 35 U.S.C. § 292, and "Unfair Competition" under Section 43(a) of the

Lanham Act, 15 U.S.C. § 1125(a)(1)(B), by virtue of including the number of the '672 patent on the brush components sold to Calico.

101. On May 8, 2002, WMI filed in the Missouri case an Affidavit of its President (who is also president of WTM) in support of its reply brief on lack of personal jurisdiction pointing out that it was WTM from whom Calico purchased the brush components marked with the '672 patent number. This is the first time that WTM has been mentioned in these proceedings.

102. As a result thereof, and as a result of the litigation approach demonstrated by Calico's counsel, WTM and WMI believe that Calico will bring the same claims against WTM, and are in reasonable and continual apprehension of a suit by Calico for False Marking and Unfair Competition, thereby wrongfully interfering with their business.

103. The brush components, because they are intended for use solely in products of the patented configuration, are not falsely marked, and marking the brush components is not a false or misleading description or representation of fact and does not misrepresent the nature, characteristics, or qualities of the goods.

104. Calico's charges of False Marking and Unfair Competition and demands to cease and desist marking the brush components with the '672 patent number constitute a grave and wrongful interference with the business of WTM and WMI in this District in violation of the Patent and Unfair Competition laws of the United States. Further, the foregoing actions taken by Calico create an actual controversy within the scope of 28 U.S.C. § 2201.

105. This being an exceptional case, Plaintiffs are entitled to an award of attorneys' fees.

WHEREFORE the Plaintiffs demand judgment against Defendants as follows:

A. On Counts I-IV, preliminary and permanent injunctive relief (1) requiring Defendants, their officers, directors, principals, agents, servants, employees, successors, and assigns, and all those in active concert or participation with them, to deliver up to Plaintiffs for destruction all infringing materials, and all materials derived therefrom; and (2) enjoining Defendants, their officers, directors, principals, agents, servants, employees, successors, and assigns, and all those in active concert or participation with them, from the infringement, contributory infringement of, and/or inducement to infringe the '672 patent;

B. On Counts I-IV, an accounting of profits and damages and a judgment for general damages, including but not limited to all the Defendants' profits as they relate to the sale of products infringing the '672 patent against each of the Defendants as compensation for Defendants' infringement of, contributory infringement of, and/or inducement to infringe the '672 patent; and an increase of such damages to three times their amount.

C. On Counts V-VI, judgment for a statutory penalty of \$500.00 for every mismarking committed by Defendants Calico and Jonel in mismarking their products with the '672 patent number, said penalty to inure 50% to the benefit of Plaintiff WMI and 50% to the United States; and an injunction against further mismarking.

D. On Counts VII-X, an Order that Defendants account for and relinquish to Plaintiffs all gains, profits and advantages derived by Defendants through their unfair competition through false descriptions, representations and designations of origin;

E. On Counts VII-X, an Order requiring Defendants to pay to Plaintiffs three times the damages they have sustained as a consequence of Defendants' false descriptions, representations and designations of origin;

F. On Counts VII-X, preliminary and permanent injunctive relief (1) requiring Defendants, their officers, directors, principals, agents, servants, employees, successors, and assigns, and all those in active concert or participation with them, to deliver up to Plaintiffs for destruction all mismarked products; (2) enjoining Defendants, their officers, directors, principals, agents, servants, employees, successors, and assigns, and all those in active concert or participation with them, from misusing Plaintiff WMI's patent number in any manner, or manufacturing, producing, distributing, circulating, selling, offering for sale, advertising, promoting or displaying any product or service bearing such patent number without Plaintiff WMI's consent.

G. On Count XI, a Declaratory Judgment declaring that Plaintiffs may continue to mark the brush component with the '672 patent number, that such marking is proper, and that such marking does not constitute false marking in violation of 35 U.S.C. § 292 or unfair competition in violation of the Lanham Act.

H. An award of attorney's fees, costs, and pre- and post-judgment interest, and such other and further relief, as the Court deems appropriate.

JURY DEMAND

Plaintiffs demand trial by jury.

Respectfully submitted,

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that on this 8th day of May, 2002, I caused copies of the foregoing Amended Complaint to be served on counsel for Defendants by fax to Florida counsel, and by first class mail, postage prepaid, addressed to:

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