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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CENTRAK, INC. and WIRELESS
COMMUNICATIONS PRODUCTS, LLC,

Plaintiffs,

v.

EKAHAU, INC.,

Defendant.

CIVIL ACTION NO. 2:11-cv-07240-ES-CLW

FIRST AMENDED COMPLAINT

Centrak, Inc. (“Centrak”) and Wireless Communications Products, LLC (“WCP”), co-plaintiffs, demand a jury trial and complain against the defendant as follows:

THE PARTIES

1. Centrak is a corporation organized and existing under the laws of the State of Delaware, and having a place of business at 5 Caufield Place, Suite 102, Newtown, Pennsylvania 18940.

2. WCP is a limited liability company organized and existing under the laws of the State of Delaware, and having a principle place of business in Connecticut.

CLAIM FOR PATENT INFRINGEMENT

COUNT ONE

8. Co-Plaintiffs Centrak and WCP repeat and incorporate herein the entirety of the allegations contained in paragraphs 1 through 7 above.

9. Defendant Ekahau has and still is directly infringing the '425 patent by, among other things, selling and offering for sale in this judicial district products which practice the location methods and which are used to build the systems claimed in the '425 patent. For example, the Ekahau LB1, a product sheet for which is attached here at Ex. 2, when used for its intended purpose, includes all of the features of at least claims 1 and 10, as well as numerous other claims, of the '425 patent. Centrak believes that discovery will reveal that Ekahau is infringing additional claims of the '425 patent.

11. Centrak and WCP have been damaged by Ekahau's infringement of the '425 patent and will be irreparably harmed unless such infringing activities are enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Centrak and WCP request judgment against Defendant on all the counts and for the following relief:

A. Declaration that the '425 patent is valid and enforceable;

B. Declaration that defendant Ekahau has infringed the '425 patent, including, but not limited to, claims 1 and 10, and other claims which discovery will show are infringed;

C. An injunction against Ekahau, each of their officers, agents, servants, employees, and attorneys, all parent and subsidiary corporations, their assigns and successors in interest, and those persons acting in active concert or participation with them, including distributors and customers, enjoining them from continuing acts of infringement of the '425 patent;

D. An accounting for damages under 35 U.S.C. §284 from Ekahau for their respective infringement of the '425 patent, and the award of damages together with interest as provided by law, such damages to include lost profits and/or reasonable royalties as the Court determines;

1 E. An award of all plaintiffs' costs and expenses; and

2 F. Such other and further relief as this Court may deem proper, just and equitable.

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4 **DEMAND FOR JURY TRIAL**

5 Plaintiff Centrak demands a trial by jury of all issues properly triable by jury in this action.

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Dated: December 16, 2011

By: s//Jeffrey I. Kaplan
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