

*Reed*      *11/10/11*  
(6)  
*11/10/11*  
**IN THE FEDERAL HIGH COURT  
IN THE LAGOS JUDICIAL DIVISION  
HOLDEN AT LAGOS**

SUIT NO

**BETWEEN**

1. **MR. ADE OYEGBOLA**
2. **MR. WALTER OLUWOLE**  
(Trading under the name and style "Lancor")

**PLAINTIFFS**

**AND**

1. **ONE LAPTOP PER CHILD (OLPC)  
ASSOCIATION INC**
2. **NICHOLAS NEGROPONTE**
3. **GROWING BUSINESS FOUNDATION**
4. **LEAPSOFT LIMITED**
5. **ALTEQ (ICT) LIMITED**

**DEFENDANTS**

**STATEMENT OF CLAIM**

1. The Plaintiffs are Nigerian Engineers / Computer Scientists currently residing in the United States of America and carry on their business under the name and style "LANCOR".
2. The 1<sup>st</sup> Defendant is a non-governmental Organisation based at 1, Cambridge Center, Cambridge MA, 02142, United States of America and engages in the manufacture and distribution of computer software and hardware.
3. The 2<sup>nd</sup> Defendant is the Chairman/CEO of the 1<sup>st</sup> Defendant.
4. The 3<sup>rd</sup> Defendant is a non-governmental organization in Nigeria and has its office at 60 Norman Williams Street, SW, Ikoyi, Lagos and is the coordinator of the activities of the 1<sup>st</sup> Defendant in Nigeria.
5. The 4<sup>th</sup> Defendant is a Company limited by shares, registered in Nigeria with its registered office at Peninsula Waterfront, Plot 8, Ozumba Mbadiwe Road, Victoria Island, Lagos and engages in the computer software development.
6. The 5<sup>th</sup> Defendant is also a company registered in Nigeria with its office at 6, Amazon Street, Ministers Hill, Maitama, Abuja and is the coordinator of the activities of the 1<sup>st</sup> Defendant in Abuja, the Federal Capital Territory.
7. The Plaintiffs aver that all the Defendants herein named are at one point or the other connected with the infringement of the Plaintiffs' design, the subject matter of this suit.
8. The Plaintiffs aver that through sweat and equity toll for over 7 (seven) years, the Plaintiffs jointly developed a new physical computer keyboard with 4 (four) shift keys and incorporated a new approach to keyboard layouts that allows for doubling the number of functions per key cap on direct access typing.
9. The Plaintiffs further aver that the driving force behind the invention is to allow for multiple languages typing without switching keyboard layouts.

10. The Plaintiffs aver that the invention avoided all the cumbersome process used in typing extended Latin-character during regular typing, specifically, the use of Alt+number codes and AltGr "dead key" typing process.

*ATOP* (8/12/11)  
**S. S. CHARLES (MRS)**  
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BY CHIEF REGISTRAR  
FEDERAL HIGH COURT  
IKOYI, LAGOS