

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

PROTEGRITY CORPORATION)	
a Cayman Islands Company, and)	
PROTEGRITY USA, INC.)	
a Delaware Corporation)	
)	
Plaintiffs,)	
)	Civil Action No. _____
v.)	
)	
ADALLOM, INC.,)	
a Delaware Corporation,)	
)	
Defendant.)	JURY TRIAL DEMAND
)	

COMPLAINT AND JURY DEMAND

Plaintiffs, PROTEGRITY CORPORATION and PROTEGRITY USA, INC., by and through their undersigned attorneys, allege, upon information and belief, as follows:

THE PARTIES

1. Plaintiff, Protegrity Corporation, is a corporation incorporated under the laws of the country of The Cayman Islands. Plaintiff, Protegrity USA, Inc. is Protegrity Corporation's principal operating subsidiary in the United States. Protegrity USA, Inc. is a Delaware Corporation, having its principal place of business at 5 High Ridge Park, Stamford, Connecticut 06905. Plaintiffs will hereinafter be collectively referred to as "Protegrity."

2. Upon information and belief, Defendant, Adallom, Inc. ("Defendant"), is a Delaware Corporation, having its principal place of business in California and having an office at 2390 El Camino Real, Suite 240, Palo Alto, California 94306.

3. This action has arisen under the patent laws of the United States, Title 35 United States Code, Section 271 *et seq.*

4. Jurisdiction of this action arises under 28 U.S.C. §1338(a). Venue is predicated under 28 U.S.C. §1391(c).

5. Upon information and belief, Defendant offers products and services within Connecticut and to Connecticut entities.

6. Specifically, Defendant has marketed its products and services to Connecticut residents.

7. On information and belief, Defendant maintains sales channels that cover Connecticut. Additionally, prior to instituting this lawsuit (as discussed below), Defendant negotiated with Protegrity concerning the subject matter of this litigation.

8. Based on at least the foregoing, Defendant is subject to personal jurisdiction in the District of Connecticut.

9. Prior to instituting this lawsuit, Protegrity requested additional technical information concerning Defendant's products alleged to infringe the Patents-in-Suit. To date, Defendant has refused to provide additional technical information.

10. Protegrity has provided Defendant with a detailed claim chart describing how the accused protect infringes the independent claims of the '707 Patent. Defendant has refused to provide a non-infringement or an invalidity position or any evidence in response to the provided claim chart.

BACKGROUND

11. Defendant offers a cloud security application ("Defendant's Database Security Product").

12. Defendant's Database Security Product is a method for detecting intrusion in a database.

13. Defendant's Database Security Product enforces policies for monitoring access and usage of a database and automatically blocking such access under certain conditions. On information and belief, these conditions include intrusion detection as claimed in the '707 Patent (defined below).

14. Protegrity notifies the public and related industries of its patent portfolio by, among other things, publishing such information on its website.

COUNT I

15. On December 4, 2007, United States Patent Number 7,305,707 (the "'707 Patent") entitled "Method for Intrusion in a Database System" was duly and regularly issued. A copy of the '707 Patent is attached hereto as Exhibit "A".

16. Protegrity Corporation is the owner of the '707 Patent. Protegrity Corporation has the right to sue for patent infringement. Aside from covenants not to sue granted in unrelated litigation, Protegrity USA, Inc. is an exclusive licensee to the '707 Patent.

17. Upon information and belief, Defendant has directly infringed the claims of the '707 Patent by having made, used or sold Defendant's Database Security Product, which duly embodies the invention as claimed therein; the infringement by Defendant of the '707 Patent injured Protegrity and will cause Protegrity added injury unless enjoined by this Court.

18. Upon information and belief, Defendant has directly infringed the claims of the '707 Patent by having made, used, offered for sale, or sold Defendant's Database Security Product.

19. Plaintiffs have been damaged by the acts of infringement complained of herein.

20. Upon information and belief, Defendant has been aware of the '707 Patent since at least its issue date.

21. Plaintiffs have no adequate remedy without the intervention of this Court.

22. This case is “exceptional” within the meaning of 35 USC § 285.

WHEREFORE, Plaintiffs pray that:

A. An injunction be granted preliminarily and permanently restraining Defendant and all those in privity with it from further infringement of Plaintiffs’ ‘707 Patent.

B. Defendant be required to account to Plaintiffs for the damages recoverable by Plaintiffs under 35 U.S.C. §284 as a result of the wrongful making, using, and selling of Plaintiffs’ inventions as claimed in the ‘707 Patent, the exact extent of which cannot now be determined by Plaintiffs, and that all of such damages be trebled.

C. Plaintiffs be awarded reasonable attorney fees;

D. Plaintiffs be allowed their costs; and

E. Such other and further relief be granted to which Plaintiffs may be justly entitled.

JURY DEMAND

Plaintiffs demand a trial by jury.

July 30, 2015

Respectfully submitted,

/s/ Woodrow H. Pollack

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