

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ANSELL HEALTHCARE  
PRODUCTS LLC,

Plaintiff,

v.

RECKITT BENCKISER LLC,

Defendant.

Civil Action No.:

1:15-cv-00915-RGA

SUPPLEMENTAL COMPLAINT

Pursuant to Fed. R. Civ. P. 15(d) and the Order of the Court dated \_\_\_\_\_, 2017 (D.I. \_\_\_\_), plaintiff Ansell Healthcare Products LLC (“Ansell”) hereby files this Supplemental Complaint to address the continued infringement of the patents-in-suit by defendant Reckitt Benckiser LLC (“RB”) through the period May 31, 2017.

1. Since the filing of the Complaint in this action on October 13, 2015 (D.I. 1), the averments of which are incorporated herein by reference, and through May 31, 2017, RB has continued to infringe U.S. Patent No. 8,087,412 (“the ’412 patent”), U.S. Patent No. 8,464,719 (“the ’719 patent”), U.S. Patent No. 9,074,027 (“the ’027 patent”) and U.S. Patent No. 9,074,029 (“the ’029 patent”) (collectively “the patents-in-suit”) by, without authority of Ansell, importing into the United States, and offering to sell and selling in the United States Durex RealFeel® synthetic polyisoprene condoms that embody claims 1, 2, 3, 4, 8 and 9 of the ’412 patent, claims 1, 8, 10, 11, 16 and 17 of the ’719 patent, claims 1 and 5 of the ’027 patent and claims 1, 2, 3, 7, 8, 11, 16 and 17 of the ’029 patent.

2. Reckitt's continued infringement of the patents-in-suit during this period has been willful.

**RELIEF REQUESTED**

WHEREFORE, Ansell requests that the Court enter a judgment in Ansell's favor and against RB and provide Ansell the following relief:

A. Order, adjudge and decree that RB has willfully infringed the '412, '719, '027 and '029 patents;

B. Award Ansell its damages in an amount adequate to compensate Ansell for RB's infringement, including without limitation on the basis of a reasonable royalty and for lost profits, together with interest thereon, in an amount to be proven at trial;

C. Increase the damages up to three times the amount found or assessed, pursuant to 35 U.S.C. § 284;

D. Find that this case is exceptional and award Ansell its respective costs and expenses for RB's infringement, including reasonable attorneys fees, pursuant to 35 U.S.C. § 285;

E. Award Ansell pre-judgment and post-judgment interest at the highest rates allowed by law; and

F. Award Ansell such other and further legal and equitable relief as may hereafter be requested and as the Court may deem just and proper.

DATED: August \_\_, 2017

/s/ David W. Marston Jr.

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