IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KOM SOFTWARE INC.,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION NO. _____
v.	§	
	§	
HEWLETT PACKARD ENTERPRISE	§	**JURY TRIAL DEMANDED**
COMPANY and DREAMWORKS	§	
ANIMATION, LLC,	§	
	§	
Defendants.		

ORIGINAL COMPLAINT

Plaintiff KOM Software Inc. ("Plaintiff" or "KOM"), by and through its attorneys, for its

Original Complaint against Hewlett Packard Enterprise Company ("HPE"), and DreamWorks

Animation, LLC ("DreamWorks") (together, "Defendants") and demanding trial by jury, hereby

alleges as follows:

I. NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the

United States, 35 U.S.C. §§ 271, *et seq.*, to enjoin and obtain damages resulting from

Defendants' unauthorized use, sale, and offer to sell in the United States of products, methods,

processes, services and/or systems that infringe KOM's United States patents, as described

herein.

2. HPE manufactures, provides, uses, sells, offers for sale, imports, and/or

distributes infringing products and services; and encourages others to use its products and

services in an infringing manner, DreamWorks and other of its customers, as set forth herein.

3. KOM seeks past and future damages and prejudgment and post-judgment interest

for HPE's past infringement of the Patents-in-Suit, as defined below.

II. PARTIES

4.   Plaintiff KOM Software Inc. is a corporation organized and existing under the laws of Canada. Its principal place of business is 150 Katimavik Road, Suite 302, Ottawa, Ontario K2L 2N2 Canada.

5.   On information and belief, Defendant HPE is a corporation organized under the laws of Delaware. HPE's registered agent for service of process in Delaware is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

6.   On information and belief, Defendant DreamWorks is a corporation organized under the laws of Delaware. DreamWorks' registered agent for service of process in Delaware is Enterprise Corporate Services, LLC, 1201 N. Market Street, Suite 1000, Wilmington, Delaware 19801.

III. JURISDICTION AND VENUE

7.   This is an action for patent infringement which arises under the patent laws of the United States, in particular, 35 U.S.C. §§ 271, 281, 283, 284 and 285.

8.   This Court has exclusive jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

9.   On information and belief, venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b) because Defendants have incorporated in this State, have transacted business in this Judicial District, and have committed and/or induced acts of patent infringement in this Judicial District.

10.   On information and belief, Defendants are subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other

persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Delaware and in this Judicial District.

FACTUAL ALLEGATIONS

BACKGROUND

11.   Founded in 1969, KOM Software provides secure data archiving and storage management software and solutions globally. KOM Software is a world-leading developer of secure data software to safeguard, secure, protect and preserve information. For over three decades, KOM has set industry standards for securing data that other companies aspire to emulate and follow. KOM develops next-generation secure data software solutions that work on any infrastructure to deliver cloud-like economics and agility, with the security and reliability of on-premise solutions.

12.   KOM delivers affordable, easy-to-use and highly-scalable long-term secure data storage software solutions that safeguard and protect information to meet individual customer needs across the most highly regulated industries and that support critical third-party applications such as E-mail archiving, Enterprise Content Management (ECM) and Document Management Systems (DMS).

13.   KOM also offers KOMpliance, an enterprise-class industry leading software solution enforcing data security, privacy and protection against security threats and vulnerabilities - like ransomware, and accidental or malicious acts. KOMpliance sets the mark for cost-effective, easy-to-implement and maintain, long-term secure data integrated solutions for secure data storage. KOMpliance represents a next generation of software technologies following historical KOM product offerings including OptiFile, a VMS based storage management software enabling direct-write to Write-Once-Read-Many "WORM" optical disk for data archive and compliance; OptiServer, a UNIX based storage management software for archiving, access,

and protection of mission critical data on optical media and jukeboxes; and KOMworx, a Windows-based storage management software solution that provides compliance, archiving, fixed content hard disk archiving, dynamic capacity management, and information lifecycle management.

14.   KOM patented software-based immutable WORM and encryption for unconditionally enforcing retention, privacy and secure erasure to meet strict compliance regulations, mitigate risks, and eliminate errors avoiding punitive fines and penalties without having to deploy proprietary hardware.   KOM's unique approach to data security allows organizations to take on advances in storage and server technology without having to resort to proprietary vendor locked hardware solutions to protect their data.

PATENTS-IN-SUIT

15.   KOM is the owner of all right, title and interest in and to U.S. Patent No. 6,438,642 (the "'642 Patent"), entitled "File-based virtual storage file system, method and computer program product for automated file management on multiple file system storage devices," issued on August 20, 2002. A copy of the '642 Patent is attached as Exhibit A.

16.   KOM is the owner of all right, title and interest in and to U.S. Patent No. 7,392,234 (the "'234 Patent"), entitled "Method and system for electronic file lifecycle management," issued on June 24, 2008. A copy of the `234 Patent is attached as Exhibit B.

17.   KOM is the owner of all right, title and interest in and to U.S. Patent No. 6,654,864 (the "'864 Patent"), entitled "Method and system for providing restricted access to a storage medium," issued on November 25, 2003. A copy of the `864 Patent is attached as Exhibit C.

18.   KOM is the owner of all right, title and interest in and to U.S. Patent No. 7,076,624 (the "'624 Patent"), entitled "Method and system for providing restricted access to a storage medium," issued on July 11, 2006. A copy of the `624 Patent is attached as Exhibit D.

19.   KOM is the owner of all right, title and interest in and to U.S. Patent No. 7,536,524 (the "'524 Patent"), entitled "Method and system for providing restricted access to a storage medium," issued on May 19, 2009. A copy of the `524 Patent is attached as Exhibit E.

20.   KOM is the owner of all right, title and interest in and to U.S. Patent No. 8,234,477 (the "'477 Patent"), entitled "Method and system for providing restricted access to a storage medium," issued on July 31, 2012. A copy of the `477 Patent is attached as Exhibit F.

21.   KOM is the owner of all right, title and interest in and to U.S. Patent No. 9,361,243 (the "'243 Patent"), entitled "Method and system for providing restricted access to a storage medium," issued on June 7, 2016. A copy of the `243 Patent is attached as Exhibit G.

22.   The '642 Patent and '234 Patent derive from a common specification, and are referred to herein as "Family 1."

23.   The '864 Patent, '624 Patent, '524 Patent, '477 Patent and '243 Patent derive from a common specification, and are referred to herein as "Family 2."

24.   Together, the foregoing patents are referred to herein as the "Patents-in-Suit." KOM is the assignee of the Patents-in-Suit, and has all substantial rights to sue for infringement and collect past and future damages for the infringement thereof.

DEFENDANTS' ACTS

25.   HPE provides software and services directed to detection, analysis and monitoring of data flow in a data network environment, including Hewlett-Packard ("HP") branded products.

26.   For example, HPE provides the HPE X9000 Network Storage System, which utilizes HPE StoreAll software for file system quotas, remote replication, snapshots, data retention and validation, data tiering, and file allocation.

27.   The following diagram illustrates the organization of data on the file system of the X9000, and how it is accessed.

1 Using X9000 Software file systems

File system organization and access

The following diagram shows how data is organized on a file system and how it is accessed.
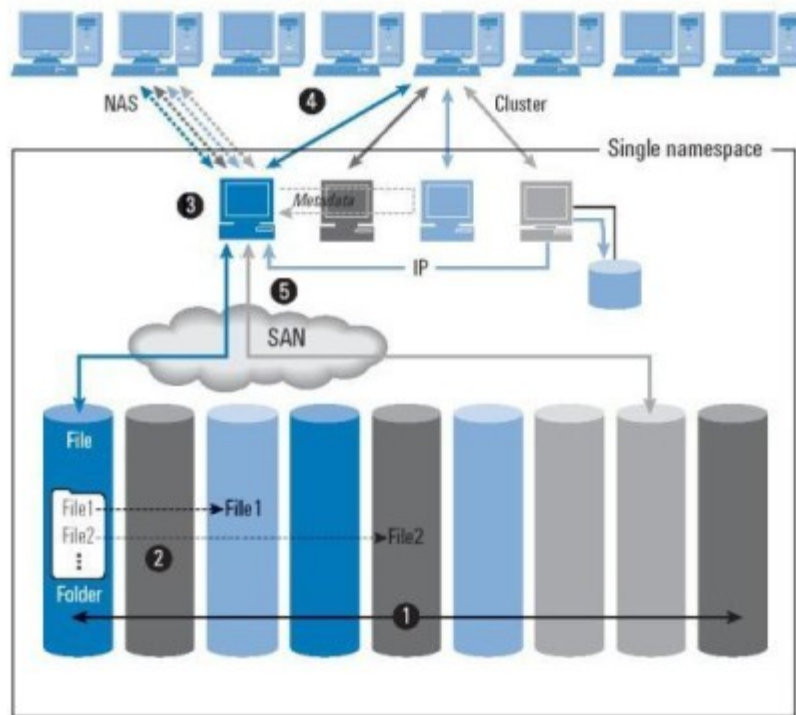
HP   X9000   File   Serving   Software   File   System   User   Guide,   Page   9, http://h20628.www2.hp.com/km-ext/kmcsdirect/emr_na-c01958612-4.pdf.

28.   The HP X9000 file system separates segments of files to organize data for faster access. For example, a directory (Dir1) can be located on one segment, while the files contained

in that directory (File1 and File2) are resident on other segments. The file system interfaces with a plurality of file system storage partitions.

29.   The location of files and directories within particular segments in the file space is independent of their respective physical locations. For example, a directory can be located on one segment, while the files contained in that directory can be resident on other segments.

30.   Data tiering is also provided by the HP X9000, in which a tiering policy is created to move files from initial storage, based on attributes such as modification time, access time, file size or file type.

31.   HPE also provides HP StoreAll, including in connection with the 9300 Storage Gateway, 9320 Storage, X9720 Storage, and 9730 Storage.

32.   WORM/Data Retention is provided in the StoreAll, enabling data retention in accordance with a retention profile for the file system, as depicted below.

HP StoreAll Storage File System User Guide at 198 (2013).

33.   HPE instructs its customers to infringe the Patents-in-Suit, including through its provision of product documentation and support at https://www.hpe.com/us/en/support.html.

34.   DreamWorks practices the methods and uses the systems claimed in the Patents-in-Suit, including without limitation in connection with its use and deployment of the HPE StoreAll Storage system. DreamWorks' use of HPE StoreAll Storage is described in a case study that can be found at https://www.hpe.com/us/en/customer-case-studies/dreamworks.html.

35.   Through its use of HPE StoreAll Storage, DreamWorks has gained increased cost efficiency in its network technology, raised its computational capacity, reduced its animation

production costs, and created stronger final products in its field. The storage solution has additionally enabled DreamWorks to handle the thousands of devices connecting to its networks daily and maintain the large quantities of data stored for its films and other products.

36.   In addition, HPE provides installation and support services, including as described in HPE Installation Service Data Sheet (November 2016), https://h20195.www2.hpe.com/V2/GetPDF.aspx/5981-9356EN.pdf.

37.   On information of belief, Defendant HPE also implements contractual protections in the form of license and use restrictions with its customers to preclude the unauthorized reproduction, distribution and modification of its software and systems.   Moreover, on information and belief, Defendant HPE implements technical precautions to attempt to prevent customers from circumventing the intended operation of HPE's products.

IV. COUNTS OF PATENT INFRINGEMENT

COUNT ONE
INFRINGEMENT OF U.S. PATENT NO. 6,438,642

38.   KOM incorporates by reference its allegations in Paragraphs 1-37 as if fully restated in this paragraph.

39.   KOM is the assignee and owner of all right, title and interest to the '642 Patent. KOM has the legal right to enforce the patent, sue for infringement, and seek equitable relief and damages.

40.   On information and belief, Defendants HPE and DreamWorks, without authorization or license from KOM, have been and are presently directly infringing at least claim 12 of the '642 Patent, as infringement is defined by 35 U.S.C. § 271(a), including through making, using (including for testing purposes), selling and offering for sale methods and articles infringing one or more claims of the '642 Patent. Defendants HPE and DreamWorks are thus

liable for direct infringement of the '642 Patent pursuant to 35 U.S.C. § 271(a). Exemplary infringing instrumentalities include HPX9000 and all associated interfaces, hardware, software, and digital content.

41.   On information and belief, at least since the receipt of written notice and the filing of the Original Complaint, Defendant HPE, without authorization or license from KOM, has been and is presently indirectly infringing at least claim 1 of the '642 Patent, including actively inducing infringement of the '642 Patent under 35 U.S.C. § 271(b). Such inducements include without limitation, with specific intent to encourage the infringement, knowingly inducing customers, including DreamWorks, to use infringing articles and methods that HPE knows or should know infringe one or more claims of the '642 Patent. HPE instructs its customers, including DreamWorks, to make and use the patented inventions of the '642 Patent by operating HPE's products in accordance with HPE's specifications. HPE specifically intends its customers, including DreamWorks, to infringe by implementing HPX9000 with automated policy-based tiering for initial placement and automated movement between tiers.

42.   As a result of HPE's and DreamWorks' infringement of the '642 Patent, KOM has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement under 35 U.S.C. § 284, including lost profits but in no event less than a reasonable royalty.

COUNT TWO
INFRINGEMENT OF U.S. PATENT NO. 7,392,234

43.   KOM incorporates by reference its allegations in Paragraphs 1-42 as if fully restated in this paragraph.

44.   KOM is the assignee and owner of all right, title and interest to the '234 Patent. KOM has the legal right to enforce the patent, sue for infringement, and seek equitable relief and damages.

45.   On information and belief, Defendants HPE and DreamWorks, without authorization or license from KOM, have been and are presently directly infringing at least claim 1 of the '234 Patent, as infringement is defined by 35 U.S.C. § 271(a), including through making, using (including for testing purposes), selling and offering for sale methods and articles infringing one or more claims of the '234 Patent. Defendants HPE and DreamWorks are thus liable for direct infringement of the '234 Patent pursuant to 35 U.S.C. § 271(a). Exemplary infringing instrumentalities include HPX9000 and all associated interfaces, hardware, software, and digital content.

46.   On information and belief, at least since the receipt of written notice and the filing of the Original Complaint, Defendant HPE, without authorization or license from KOM, has been and is presently indirectly infringing at least claim 1 of the '234 Patent, including actively inducing infringement of the '234 Patent under 35 U.S.C. § 271(b). Such inducements include without limitation, with specific intent to encourage the infringement, knowingly inducing customers, including DreamWorks, to use infringing articles and methods that HPE knows or should know infringe one or more claims of the '234 Patent. HPE instructs its customers, including DreamWorks, to make and use the patented inventions of the '234 Patent by operating HPE's products in accordance with HPE's specifications. HPE instructs its customers, including DreamWorks, to make and use the patented inventions of the '234 Patent by operating HPE's products in accordance with HPE's specifications. HPE specifically intends its customers,

including DreamWorks, to infringe by implementing HPX9000 with automated policy-based tiering for initial placement and automated movement between tiers.

47.   As a result of HPE's and DreamWorks' infringement of the '234 Patent, KOM has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement under 35 U.S.C. § 284, including lost profits but in no event less than a reasonable royalty.

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COUNT THREE
INFRINGEMENT OF U.S. PATENT NO. 6,654,864

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48.   KOM incorporates by reference its allegations in Paragraphs 1-47 as if fully restated in this paragraph.

49.   KOM is the assignee and owner of all right, title and interest to the '864 Patent. KOM has the legal right to enforce the patent, sue for infringement, and seek equitable relief and damages.

50.   On information and belief, Defendants HPE and DreamWorks, without authorization or license from KOM, have been and are presently directly infringing at least claim 1 of the '864 Patent, as infringement is defined by 35 U.S.C. § 271(a), including through making, using (including for testing purposes), selling and offering for sale methods and articles infringing one or more claims of the '864 Patent. Defendants HPE and DreamWorks are thus liable for direct infringement of the '864 Patent pursuant to 35 U.S.C. § 271(a). Exemplary infringing products include HPE StoreAll 8000 Storage.

51.   On information and belief, at least since the receipt of written notice and the filing of the Original Complaint, Defendant HPE, without authorization or license from KOM, has been and is presently indirectly infringing at least claim 1 of the '864 Patent, including actively inducing infringement of the '864 Patent under 35 U.S.C. § 271(b). Such inducements include

without limitation, with specific intent to encourage the infringement, knowingly inducing customers, including DreamWorks, to use infringing articles and methods that HPE knows or should know infringe one or more claims of the '864 Patent. HPE instructs its customers, including DreamWorks, to make and use the patented inventions of the '864 Patent by operating HPE's products in accordance with HPE's specifications. HPE specifically intends its customers, including DreamWorks, to infringe by implementing HPE StoreAll to support data retention policies and WORM.

52. As a result of HPE's and DreamWorks' infringement of the '864 Patent, KOM has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement under 35 U.S.C. § 284, including lost profits but in no event less than a reasonable royalty.

COUNT FOUR
INFRINGEMENT OF U.S. PATENT NO. 7,076,624

53. KOM incorporates by reference its allegations in Paragraphs 1-52 as if fully restated in this paragraph.

54. KOM is the assignee and owner of all right, title and interest to the '624 Patent. KOM has the legal right to enforce the patent, sue for infringement, and seek equitable relief and damages.

55. On information and belief, Defendants HPE and DreamWorks, without authorization or license from KOM, have been and are presently directly infringing at least claim 12 of the '624 Patent, as infringement is defined by 35 U.S.C. § 271(a), including through making, using (including for testing purposes), selling and offering for sale methods and articles infringing one or more claims of the '624 Patent. Defendants HPE and DreamWorks are thus

liable for direct infringement of the '624 Patent pursuant to 35 U.S.C. § 271(a). Exemplary infringing products include HPE StoreAll 8000 Storage.

56.   On information and belief, at least since the receipt of written notice and the filing of the Original Complaint, Defendant HPE, without authorization or license from KOM, has been and is presently indirectly infringing at least claim 1 of the '624 Patent, including actively inducing infringement of the '624 Patent under 35 U.S.C. § 271(b). Such inducements include without limitation, with specific intent to encourage the infringement, knowingly inducing customers, including DreamWorks, to use infringing articles and methods that HPE knows or should know infringe one or more claims of the '624 Patent. HPE instructs its customers to make and use the patented inventions of the '624 Patent by operating HPE's products in accordance with HPE's specifications. HPE specifically intends its customers, including DreamWorks, to infringe by implementing HPE StoreAll to support data retention policies and WORM.

57.   As a result of HPE's and DreamWorks' infringement of the '624 Patent, KOM has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement under 35 U.S.C. § 284, including lost profits but in no event less than a reasonable royalty.

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COUNT FIVE
INFRINGEMENT OF U.S. PATENT NO. 7,536,524

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58.   KOM incorporates by reference its allegations in Paragraphs 1-57 as if fully restated in this paragraph.

59.   KOM is the assignee and owner of all right, title and interest to the '524 Patent. KOM has the legal right to enforce the patent, sue for infringement, and seek equitable relief and damages.

60.   On information and belief, Defendants HPE and DreamWorks, without authorization or license from KOM, have been and are presently directly infringing at least claim 29 of the '524 Patent, as infringement is defined by 35 U.S.C. § 271(a), including through making, using (including for testing purposes), selling and offering for sale methods and articles infringing one or more claims of the '524 Patent. Defendants HPE and DreamWorks are thus liable for direct infringement of the '524 Patent pursuant to 35 U.S.C. § 271(a). Exemplary infringing products include HPE StoreAll 8000 Storage.

61.   On information and belief, at least since the receipt of written notice and the filing of the Original Complaint, Defendant HPE, without authorization or license from KOM, has been and is presently indirectly infringing at least claim 1 of the '524 Patent, including actively inducing infringement of the '524 Patent under 35 U.S.C. § 271(b). Such inducements include without limitation, with specific intent to encourage the infringement, knowingly inducing customers, including DreamWorks, to use infringing articles and methods that HPE knows or should know infringe one or more claims of the '524 Patent. HPE instructs its customers, including DreamWorks, to make and use the patented inventions of the '524 Patent by operating HPE's products in accordance with HPE's specifications. HPE specifically intends its customers, including DreamWorks, to infringe by implementing HPE StoreAll to support data retention policies and WORM.

62.   As a result of HPE's and DreamWorks' infringement of the '524 Patent, KOM has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement under 35 U.S.C. § 284, including lost profits but in no event less than a reasonable royalty.

COUNT SIX
INFRINGEMENT OF U.S. PATENT NO. 8,234,477

63.   KOM incorporates by reference its allegations in Paragraphs 1-62 as if fully restated in this paragraph.

64.   KOM is the assignee and owner of all right, title and interest to the '477 Patent. KOM has the legal right to enforce the patent, sue for infringement, and seek equitable relief and damages.

65.   On information and belief, Defendants HPE and DreamWorks, without authorization or license from KOM, have been and are presently directly infringing at least claim 1 of the '477 Patent, as infringement is defined by 35 U.S.C. § 271(a), including through making, using (including for testing purposes), selling and offering for sale methods and articles infringing one or more claims of the '477 Patent. Defendants HPE and DreamWorks are thus liable for direct infringement of the '477 Patent pursuant to 35 U.S.C. § 271(a). Exemplary infringing products include HPE StoreAll 8000 Storage.

66.   On information and belief, at least since the receipt of written notice and the filing of the Original Complaint, Defendant HPE, without authorization or license from KOM, has been and is presently indirectly infringing at least claim 1 of the '477 Patent, including actively inducing infringement of the '477 Patent under 35 U.S.C. § 271(b). Such inducements include without limitation, with specific intent to encourage the infringement, knowingly inducing customers, including DreamWorks, to use infringing articles and methods that HPE knows or should know infringe one or more claims of the '477 Patent. HPE instructs its customers, including DreamWorks, to make and use the patented inventions of the '477 Patent by operating HPE's products in accordance with HPE's specifications. HPE specifically intends its

customers, including DreamWorks, to infringe by implementing HPE StoreAll to support data retention policies and WORM.

67.   As a result of HPE's and DreamWorks' infringement of the '477 Patent, KOM has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement under 35 U.S.C. § 284, including lost profits but in no event less than a reasonable royalty.

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COUNT SEVEN
INFRINGEMENT OF U.S. PATENT NO. 9,361,243

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68.   KOM incorporates by reference its allegations in Paragraphs 1-67 as if fully restated in this paragraph.

69.   KOM is the assignee and owner of all right, title and interest to the '243 Patent. KOM has the legal right to enforce the patent, sue for infringement, and seek equitable relief and damages.

70.   On information and belief, Defendants HPE and DreamWorks, without authorization or license from KOM, have been and are presently directly infringing at least claim 1 of the '243 Patent, as infringement is defined by 35 U.S.C. § 271(a), including through making, using (including for testing purposes), selling and offering for sale methods and articles infringing one or more claims of the '243 Patent. Defendants HPE and DreamWorks are thus liable for direct infringement of the '243 Patent pursuant to 35 U.S.C. § 271(a). Exemplary infringing products include HPE StoreAll 8000 Storage.

71.   On information and belief, at least since the receipt of written notice and the filing of the Original Complaint, Defendant HPE, without authorization or license from KOM, has been and is presently indirectly infringing at least claim 1 of the '243 Patent, including actively inducing infringement of the '243 Patent under 35 U.S.C. § 271(b). Such inducements include

without limitation, with specific intent to encourage the infringement, knowingly inducing customers, including DreamWorks, to use infringing articles and methods that HPE knows or should know infringe one or more claims of the '243 Patent.   HPE instructs its customers, including DreamWorks, to make and use the patented inventions of the '243 Patent by operating HPE's products in accordance with HPE's specifications.   HPE specifically intends its customers, including DreamWorks, to infringe by implementing HPE StoreAll to support data retention policies and WORM.

72.   As a result of HPE's and DreamWorks' infringement of the '243 Patent, KOM has suffered monetary damages, and is entitled to an award of damages adequate to compensate it for such infringement under 35 U.S.C. § 284, including lost profits but in no event less than a reasonable royalty.

VI.   WILLFUL INFRINGEMENT

73.   Plaintiff alleges upon information and belief that, in connection with the knowledge it gained in connection with its own prosecution activities, Defendant HPE and/or its predecessors-in-interest and/or its affiliates have been made aware of at least the '642 Patent, the '234 Patent, the '864 Patent, the '624 Patent and the '524 Patent.

74.   Notwithstanding this knowledge, Defendant HPE has knowingly or with reckless disregard willfully infringed one or more of the foregoing Patents-in-Suit.   Defendant HPE has thus had actual notice of infringement of one or more of the Patents-in-Suit and acted despite an objectively high likelihood that its actions constituted infringement of Plaintiff's valid patent rights.

75.   This objective risk was either known or so obvious that it should have been known to Defendant HPE.   Accordingly, Plaintiff seeks enhanced damages from Defendant HPE pursuant to 35 U.S.C. § 284.

VII.   JURY DEMAND

76.   Plaintiff KOM demands a trial by jury of all matters to which it is entitled to trial by jury, pursuant to FED. R. CIV. P. 38.

VIII.   PRAYER FOR RELIEF

WHEREFORE, KOM prays for judgment and seeks relief against Defendant as follows:

A.   That the Court determine that one or more claims of the Patents-in-Suit are infringed by Defendants HPE and DreamWorks, either literally or under the doctrine of equivalents;

B.   That the Court award damages adequate to compensate KOM for the patent infringement that has occurred, together with prejudgment and post-judgment interest and costs, and an ongoing royalty for continued infringement;

C.   That the Court permanently enjoin Defendant pursuant to 35 U.S.C. § 283;

D.   That the Court award enhanced damages against Defendant HPE pursuant to 35 U.S.C. §284; and

E.   That the Court award such other relief to KOM as the Court deems just and proper.

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Dated: January 29, 2018

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