

3. On information and belief, defendant Openet Telecom, Inc. is a Delaware corporation having a principal place of business at 11465 Sunset Hills Road, Suite 310, Reston, VA 20190.

4. On information and belief, defendant Openet Telecom Ltd. is an Irish corporation having a principal place of business at 6 Beckett Way, Park West Business Park, Dublin 12, Ireland.

5. On information and belief, Openet Telecom, Inc. and Openet Telecom Ltd. are in the business of developing and providing convergent mediation software and systems to customers in the United States and this Judicial District under the name FusionWorks.

JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code.

7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b).

9. On information and belief, Openet Telecom, Inc. is subject to this Court's personal jurisdiction because it is located in the Eastern District of Virginia, has transacted business in this Judicial District, and/or has committed, contributed to, and/or induced acts of patent infringement in this District.

10. On information and belief, Openet Telecom Ltd. is subject to this Court's personal jurisdiction because it, directly or through intermediaries, has transacted business in this

Judicial District, and/or has committed, contributed to, and/or induced acts of patent infringement in this District.

PATENT INFRINGEMENT COUNTS

11. Amdocs is the owner of all right, title, and interest in U.S. Patent Nos. 6,836,797, 7,631,065, 7,412,510, and 6,947,984 which Defendants are infringing and/or inducing others to infringe by, among other things, making, using, making available for another's use, offering to sell or selling in the United States, or importing into the United States, products or processes that practice inventions claimed in the said patents.

12. Defendants have profited through infringement of the said patents. As a result of Defendants' unlawful infringement of the said patents, Amdocs is entitled to recover from Defendants damages suffered by Amdocs as a result of Defendants' unlawful acts.

13. On information and belief, Defendants' continued infringement subsequent to notice of said patents is willful and deliberate, entitling Amdocs to enhanced damages and reasonable attorney fees and costs. Amdocs has provided Defendants notice of infringement through service of this complaint.

14. On information and belief, Defendants intend to continue their unlawful infringing activity, and Amdocs continues to and will continue to suffer irreparable harm—for which there is no adequate remedy at law—from such unlawful infringing activity unless Defendants are enjoined by this Court.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,836,797

15. Amdocs realleges and incorporates by reference the allegations set forth in paragraphs 1 – 13.

16. Amdocs is the owner of all right, title, and interest in U.S. Patent No. 6,836,797 (“the ‘797 patent”), entitled “System, Method and Computer Program Product For Network Record Synthesis,” duly and properly issued by the U.S. Patent and Trademark Office on December 28, 2004. A copy of the ‘797 patent is attached as Exhibit A.

17. Defendants have been and/or are directly infringing, inducing infringement of, and/or contributing to the infringement of the ‘797 patent by, among other things, making, using, making available for another’s use, offering to sell or selling in the United States, or importing into the United States, hardware and software, including but not limited to FusionWorks mediation products, that embody or incorporate, or the operation of which otherwise practices, one or more claims of the ‘797 patent.

18. By reason of Defendants’ infringing activities, Amdocs is suffering and will continue to suffer substantial damages in an amount to be determined at trial.

19. Defendants’ acts complained of herein are damaging and will continue to damage Amdocs irreparably. Amdocs has no adequate remedy at law for these wrongs and injuries. Amdocs is therefore entitled to an injunction restraining and enjoining Defendants from infringing the claims of the ‘797 patent.

COUNT II

INFRINGEMENT OF U.S. PATENT NO. 7,631,065

20. Amdocs realleges and incorporates by reference the allegations set forth in paragraphs 1 – 13.

21. Amdocs is the owner of all right, title, and interest in U.S. Patent No. 7,631,065 (“the ‘065 patent”), entitled “System, Method and Computer Program Product For Merging Data in a Network-Based Filtering and Aggregating Platform,” duly and properly issued by the U.S.

Patent and Trademark Office on December 8, 2009. A copy of the '065 patent is attached as Exhibit B.

22. Defendants have been and/or are directly infringing, inducing infringement of, and/or contributing to the infringement of the '065 patent by, among other things, making, using, making available for another's use, offering to sell or selling in the United States, or importing into the United States, hardware and software, including but not limited to FusionWorks mediation products, that embody or incorporate, or the operation of which otherwise practices, one or more claims of the '065 patent.

23. By reason of Defendants' infringing activities, Amdocs is suffering and will continue to suffer substantial damages in an amount to be determined at trial.

24. Defendants' acts complained of herein are damaging and will continue to damage Amdocs irreparably. Amdocs has no adequate remedy at law for these wrongs and injuries. Amdocs is therefore entitled to an injunction restraining and enjoining Defendants from infringing the claims of the '065 patent.

COUNT III

INFRINGEMENT OF U.S. PATENT NO. 7,412,510

25. Amdocs realleges and incorporates by reference the allegations set forth in paragraphs 1 – 13.

26. Amdocs is the owner of all right, title, and interest in U.S. Patent No. 7,412,510 ("the '510 patent"), entitled "System, Method and Computer Program Product For Reporting on the Collection of Network Usage Information," duly and properly issued by the U.S. Patent and Trademark Office on August 12, 2008. A copy of the '510 patent is attached as Exhibit C.

27. Openet has been and/or is directly infringing the '510 patent by, among other things, making, using, making available for another's use, offering to sell or selling in the United States the hardware and software, that embody or incorporate, or the operation of which otherwise practices, one or more claims of the '510 patent.

COUNT IV

INFRINGEMENT OF U.S. PATENT NO. 6,947,984

28. Amdocs realleges and incorporates by reference the allegations set forth in paragraphs 1 – 13.

29. Amdocs is the owner of all right, title, and interest in U.S. Patent No. 6,947,984 (“the '984 patent”), entitled “System, Method and Computer Program Product For Reporting in a Network-Based Filtering and Aggregating Platform,” duly and properly issued by the U.S. Patent and Trademark Office on September 20, 2005. A copy of the '984 patent is attached as Exhibit D.

30. Openet has been and/or is directly infringing the '984 patent by, among other things, making, using, making available for another's use, offering to sell or selling in the United States the hardware and software, that embody or incorporate, or the operation of which otherwise practices, one or more claims of the '984 patent.

DEMAND FOR JURY TRIAL

31. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Amdocs respectfully requests a trial by jury on all issues properly triable by jury.

PRAYER FOR RELIEF

WHEREFORE, Amdocs prays for relief as follows:

- A. For a judgment declaring that Defendants have directly infringed, actively induced infringement of, and/or committed acts of contributory infringement of, at least one claim of each of the '797, '065, '510, and '984 patents;
- B. For a judgment awarding Amdocs compensatory damages as a result of Defendants' infringement of the '797, '065, '510, and '984 patents, together with interest and costs, and in no event less than a reasonable royalty;
- C. For a judgment declaring that Defendants' infringement of the '797, '065, '510, and '984 patents has been willful and deliberate;
- D. For a judgment awarding Amdocs pre-judgment and post-judgment interest;
- E. For a judgment awarding Amdocs treble damages under 35 U.S.C. § 284 as a result of Defendants' willful and deliberate infringement;
- F. For a judgment declaring that this case is exceptional and awarding Amdocs its expenses, costs, and attorney fees in accordance with 35 U.S.C. §§ 284 and 285 and Rule 54(d) of the Federal Rules of Civil Procedure;
- G. For a grant of preliminary and permanent injunctions pursuant to 35 U.S.C. § 283, enjoining Defendants from further acts of infringement; and
- H. For such other and further relief as the Court deems just and proper.

Respectfully Submitted,

February 9, 2018

/s/ Gregory H. Lantier
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Counsel for Amdocs (Israel) Limited and
Amdocs Development Limited

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of February, 2018, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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