IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ERROL LLC,	)
	)
Plaintiff,	)
	) Civil Action No. _____
v.	)
	) **JURY TRIAL DEMANDED**
MICRO FOCUS (US), INC.,	)
	)
Defendant.	)
	)

COMPLAINT

For its Complaint, Errol LLC ("Errol"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Errol is a Texas limited liability company with a place of business located at 5068 West Plano Parkway, Suite 300, Plano, Texas 75093.

2. Defendant Micro Focus (US), Inc. is a Delaware company with, upon information and belief, a place of business located at 8310 North Capital of Texas Highway, Building 1, Suite 155, Austin, Texas 78731.

3. By registering to conduct business in Delaware, Defendant has a permanent and continuous presence in Delaware.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

6. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, 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 this district.

7. Venue is proper in this district pursuant to § 1400(b).

THE PATENTS-IN-SUIT

8. On November 19, 2002, U.S. Patent No. 6,484,166 (the "'166 patent"), entitled "Information Management, Retrieval and Display System and Associated Method," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '166 patent is attached hereto as Exhibit A.

9. On February 22, 2011, U.S. Patent No. RE42,167 (the "'167 patent"), entitled "Information Management, Retrieval and Display System and Associated Methods," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '167 patent is attached hereto as Exhibit B.

10. The '166 and '177 patents explain:

> An inherent drawback in many conventional search engines or search tools, such as Infoseek™, AltaVista™, Hotbot™, is that the results of the search are typically organized according to the number of hits that the search word or phrase made in each document (Web page) being searched. This type of search result display requires the end user to go through the hits one by one in order to finally access the document he/she was looking for. Another drawback with such conventional search engines is that the results of the search do not take into account that a word may have several different meanings, and may be used in many different contexts. For example, if an end user were looking for information on a cartoon mouse, because the search query would contain the word "mouse," the list of hits will include documents for the electronic cursor-control devices, documents providing biological information on mice, documents providing pet information on mice, etc. Therefore, the end user may have to go through an enormous number of these hits before finally (if ever) reaching a hit related to the cartoon mouse.
>
> Thus, there is a need for a search engine or search tool that allows the end user to that arranges the search results in a manner that allows the end user to effectively and quickly obtain items of interest.

Ex. A at col. 1, ll. 21-44; Ex. B at col. 1, ll. 19-42.

11. The '166 and '167 patent disclose and claim inventions that "will allow the end-user to effectively and quickly obtain items of interest from the search results." Ex. A at col. 1, ll. 56-58, col. 5, ll. 57-59; Ex. B at col. 1, ll. 54-56, col. 5, ll. 54-56.

12. Included in the '166 and '167 patents is exemplary code. *See* Ex. A at Tables 1-2; Ex. B at Tables 1-2.

13. Errol is the assignee and owner of the right, title and interest in and to the '166 and '167 patents, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

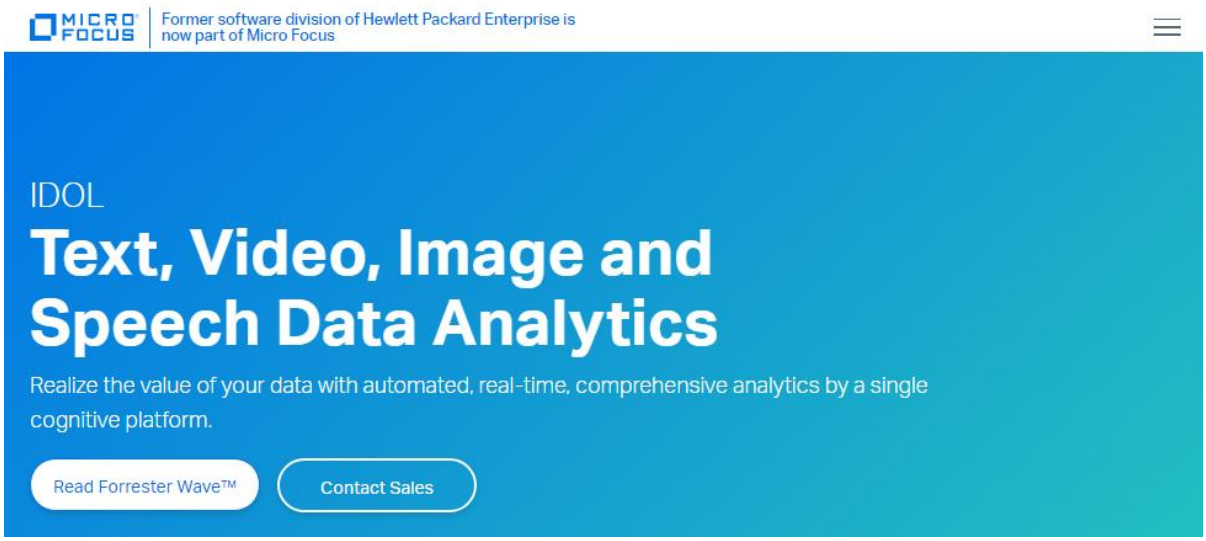
COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,484,166

14. Errol repeats and realleges the allegations of paragraphs 1 through 13 as if fully set forth herein.

15. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe at least claim 3 of the '166 patent by making, using, importing, offering for sale, and/or selling, systems and methods for retrieving information from an informational resource, including, but not limited to, Micro Focus IDOL ("IDOL"), because each and every element is met either literally or equivalently.

16. Upon information and belief, Defendant used IDOL via its internal use and testing in the United States, directly infringing one or more claims of the '166 patent.

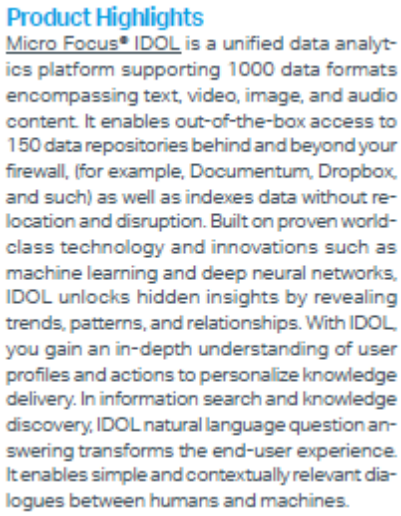
17. More specifically, IDOL enables users to perform search and get the desired information (e.g., "retrieving information") from various repositories (e.g., "information resources").



https://software.microfocus.com/en-us/products/information-data-analytics-idol/overview ("Overview") (last accessed June 14, 2018).

Advanced enterprise search is about providing enterprise search results based upon relevant concepts associated with the search terms. This goes beyond simple key-word search. A conceptual enterprise search example—if you search for Apple, you may see results associated with Apple, Samsung, and Microsoft because IDOL understands that these companies are related, in that they're in the same industry and address similar markets.

Data Sheet ("Data Sheet") at p.2 (available at http://files.asset.microfocus.com/4aa6-4514/en/4aa6-4514.pdf (last accessed June 14, 2018)).



Product Highlights

Micro Focus® IDOL is a unified data analytics platform supporting 1000 data formats encompassing text, video, image, and audio content. It enables out-of-the-box access to 150 data repositories behind and beyond your firewall, (for example, Documentum, Dropbox, and such) as well as indexes data without relocation and disruption. Built on proven world-class technology and innovations such as machine learning and deep neural networks, IDOL unlocks hidden insights by revealing trends, patterns, and relationships. With IDOL, you gain an in-depth understanding of user profiles and actions to personalize knowledge delivery. In information search and knowledge discovery, IDOL natural language question answering transforms the end-user experience. It enables simple and contextually relevant dialogues between humans and machines.

Id. at p. 1. IDOL performs various functions, such as categorization, on the documents that it receives from various information sources. Each of these incoming documents is processed individually such as to assign category to them. Thus, it can be inferred that the incoming documents (forming "informational resource") are separated into individual documents (e.g., "discrete finite elements") before processing.

5. Before storing content in IDOL server

IDOL server stores the content of documents in its Data index (by default this comprises the IDOL server databases News and Archive). The process of storing content in IDOL server is called indexing.

Before you start to index files into IDOL server you need to:

- **decide how you want to store content**
- **set up field indexing**
- **configure IDOL server to process required languages**
- **optimize the indexing process according to your system**

You can also configure IDOL server to process documents that it receives (for example from an Autonomy connector) before it indexes them. You can set up a simple process by configuring IDOL server to execute a single task on incoming documents, or set up a complex process by configuring IDOL server to combine a number of tasks.

The available tasks allow you to do one or more of the following:

- execute an ACI action
- alert users to documents that match their agents
- categorize documents
- extract information from unstructured data and store it in structured fields
- modify document fields
- write files to disk
- send an http call
- import and categorize the legacy profiles in BIF files
- evaluate the quality of files produced as a result of optical character recognition
- route documents to different tasks
- index documents

IDOL server: Administrator's Guide ("Administrator's Guide") at p. 63 (available at http://otndnld.oracle.co.jp/document/products/E13155_01/wlp/docs103/autonomy/pdf/IDOL%20server%205%20rev4.pdf (last accessed June 14, 2018)).

Categorization

In categorization, you assign documents to categories according to what the document and the category have in common.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/Improve/Categorization.htm%3FTocPath%3DUse%2520Your%2520Content%7CImprove%7CCategorization%7C_____0 (last accessed June 14, 2018). Once a document (e.g., "discrete finite element") is received, its content is analyzed to identify the categories to which the document belongs. Thus, the documents are classified into categories (i.e., categorical tags).

> Categorization automatically identifies the ideas that documents contain, and classifies these documents according to their content. You can tag the documents according to the category, and you can use the tags as a trigger for a further workflow process, such as approval or examination.

Id.

Document Tagging

Document Tagging is the general process of adding extra information to documents. It includes static additions to the documents (for example, adding information from Eduction into the document) or more dynamic information (for example, marking a document for further analysis or workflow).

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/EnrichContent/Document_Tagging.htm%3FTocPath%3DBefore%2520You%2520Index%7CEnrich%2520Your%2520Content%7C_____5 (last accessed June 14, 2018).

Eduction

Eduction is the process of finding *entities* in documents, and typically extracting them to form additional fields in the document. Entities are words, phrases, or blocks of information.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/EductionAndSentimentAnalysis/Eduction.htm (last accessed June 14, 2018). Documents are indexed and stored in a database and a user can run queries to search for documents in a database.

6. Storing content in IDOL server

IDOL server stores the content of documents in its Data index (by default this comprises the IDOL server databases News and Archive). The process of storing content in IDOL server is called indexing.

Only files in XML or IDX format can be indexed into IDOL server. If the data that you want to index into IDOL server is in XML format, you can index it directly into IDOL server (using a **DREADD** or **DREADDDATA** command), without having to import it first.

If your data is not in XML format, you can import it into XML or IDX format:

- **using a connector**

  The Autonomy connectors (for example, File System Fetch, HTTPFetch, Oracle Fetch and so on) allow you to retrieve documents from different repositories and import them into IDX file format only. Please refer to the appropriate connector manual for further information on how to import documents.

- **manually**

  You can create a text file in XML or IDX format (see **Appendix D: manually creating IDX files** on page 431), which contains the information that you want to index into your IDOL server in specific IDOL server fields.

Once documents have been imported into XML or IDX file format, you can index them into IDOL server:

- **using a connector**

  The Autonomy connectors allow you to index the IDX files that they have created into the IDOL server that they connect to. Please refer to the appropriate connector manual for further information on how to index documents.

- **directly**

  You can index XML and IDX files into an IDOL server using an HTTP request that you can issue from your web browser.

Note: depending on where the data that IDOL server indexes is located, the indexing process takes place in the following order:

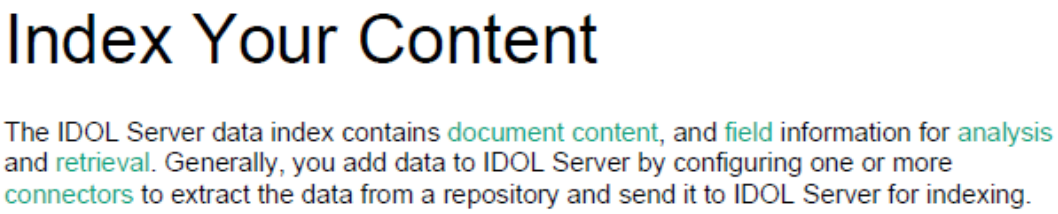
IDOL server indexes a locally accessible file:

1. IDOL server receives a filename.
2. IDOL server opens the file and reads the data.
3. The indexing process takes place

IDOL server receives data over the indexing port:

1. IDOL server receives a stream of data over the port.
2. IDOL server saves the data locally.
3. IDOL server opens the file and reads the data.
4. The indexing process takes place

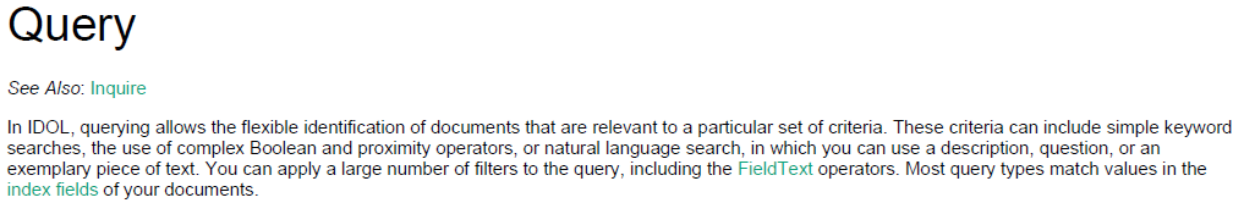
Administrator's Guide at p. 83.



Index Your Content

The IDOL Server data index contains document content, and field information for analysis and retrieval. Generally, you add data to IDOL Server by configuring one or more connectors to extract the data from a repository and send it to IDOL Server for indexing.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/IntroductionTopics/Index_Your_Content.htm (last accessed June 14, 2018).

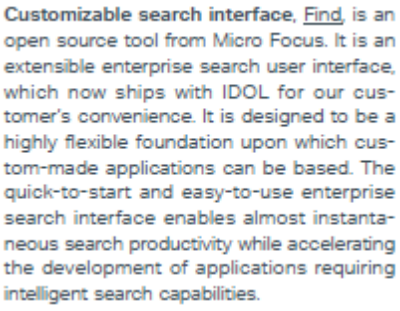


Query

See Also: Inquire

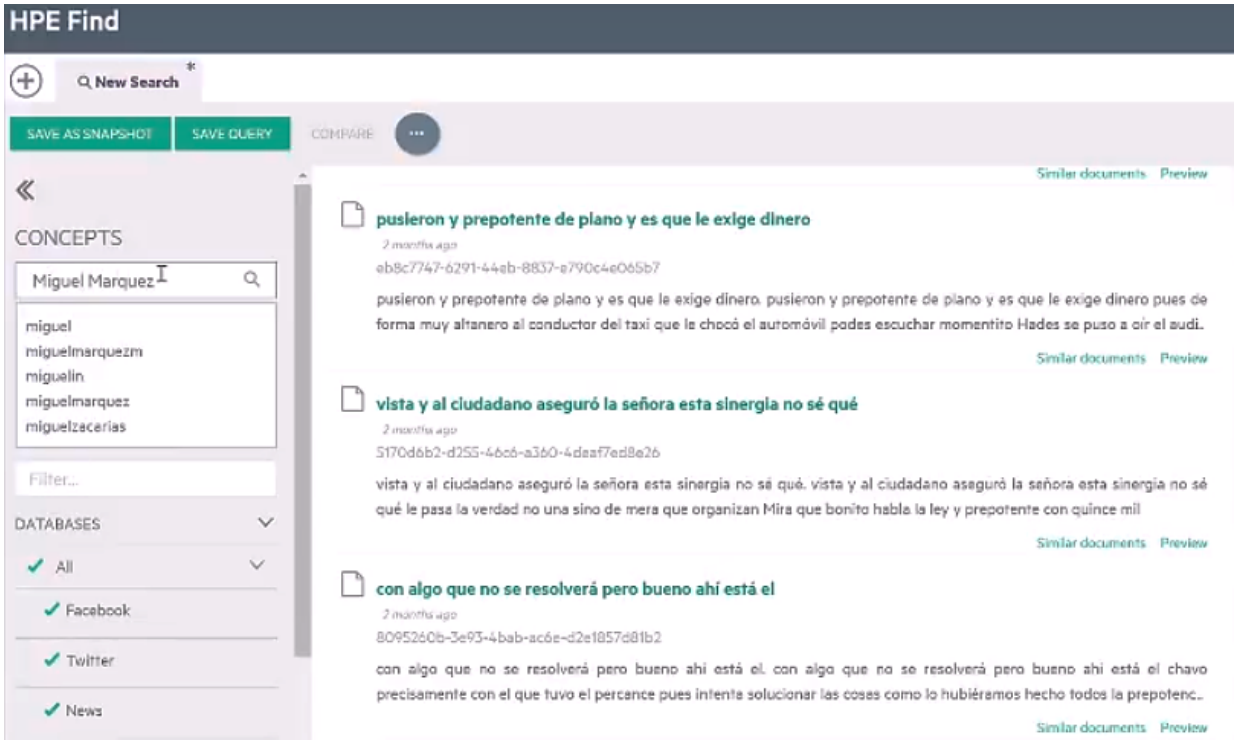
In IDOL, querying allows the flexible identification of documents that are relevant to a particular set of criteria. These criteria can include simple keyword searches, the use of complex Boolean and proximity operators, or natural language search, in which you can use a description, question, or an exemplary piece of text. You can apply a large number of filters to the query, including the FieldText operators. Most query types match values in the index fields of your documents.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/Inquire/Query.htm (last accessed June 14, 2018). A user can provide a search query to the IDOL through its search interface. The search keyword(s) are searched in the index database to identify corresponding results.



Customizable search interface, Find, is an open source tool from Micro Focus. It is an extensible enterprise search user interface, which now ships with IDOL for our customer's convenience. It is designed to be a highly flexible foundation upon which custom-made applications can be based. The quick-to-start and easy-to-use enterprise search interface enables almost instantaneous search productivity while accelerating the development of applications requiring intelligent search capabilities.

Data Sheet at p. 3.



https://www.youtube.com/watch?v=99tBeKk1U30 ("YouTube Video") at 3:42 of 8:17 (last accessed June 14, 2018). Based on the search query, the database containing indexed information is searched to identify any records matching the search query. These records store contents of the indexed documents and link to the documents. Thus, the link to the document associates the database record to the corresponding document.

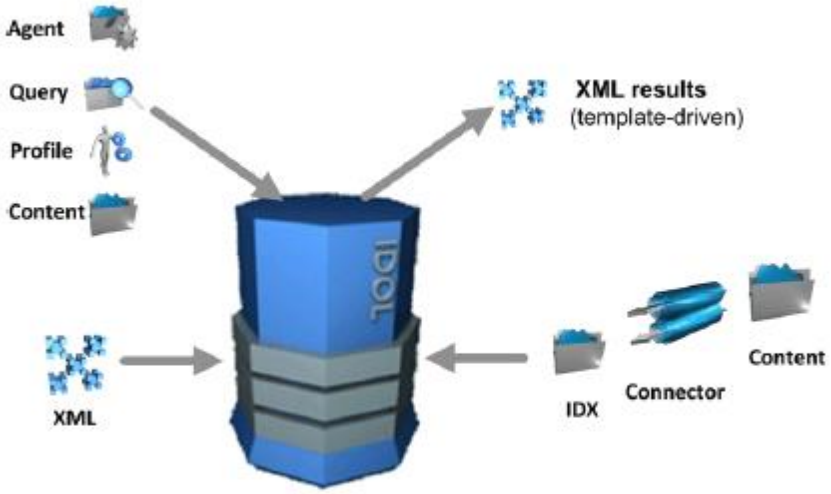
> **Index Fields**
>
> IDOL server processes index fields linguistically. It removes stop words, and stems each term before storing the terms. This process allows IDOL to return documents that match a conceptual query or contain keyword search terms.

HPE IDOL: IDOL Getting Started ("Getting Started") at p. 95 (available at https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/pdf/English/IDOL_11.0_GettingStarted_en.pdf (last accessed June 14, 2018)).

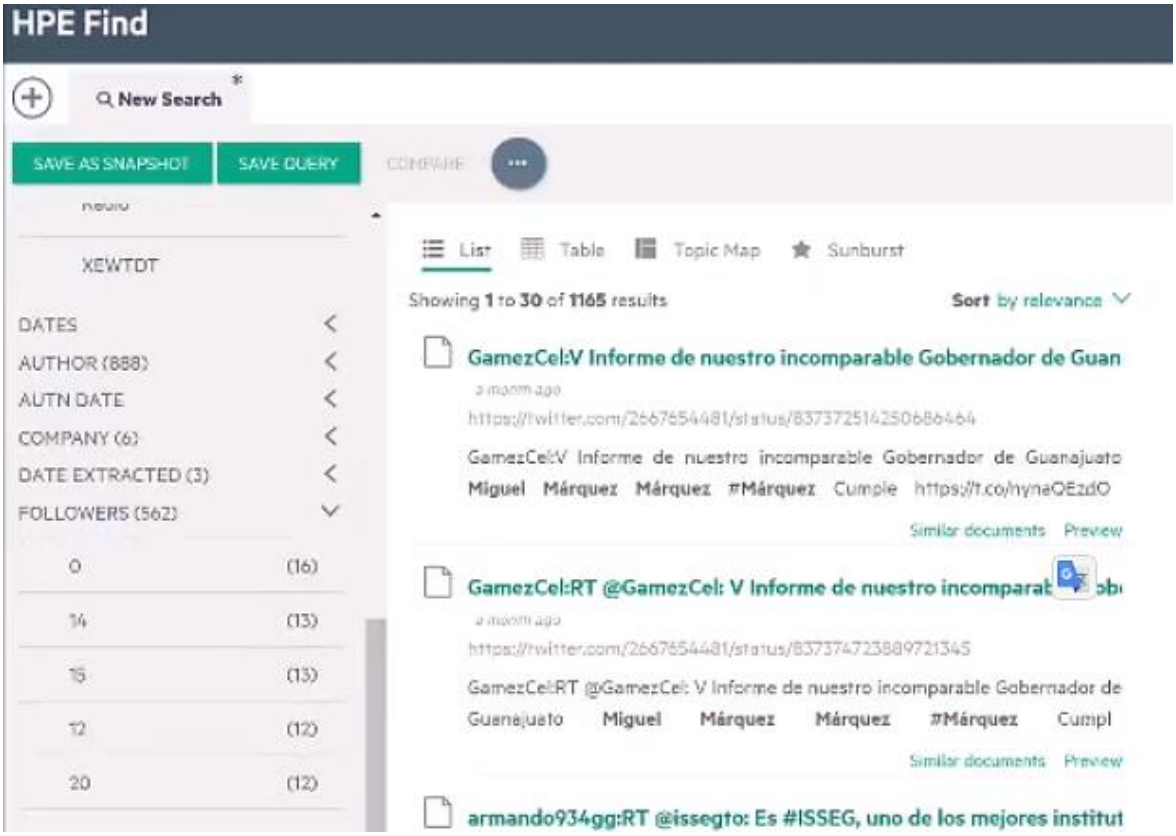
Index and Query

You index documents into IDOL in HPE IDOL IDX format or in XML format (directly or using a Connector). IDOL stores the concepts of the document. In response to queries, agents, profiles or content, it returns a link to the result document. IDOL also returns a percentage weighting, which indicates how relevant the result document is to the original query.

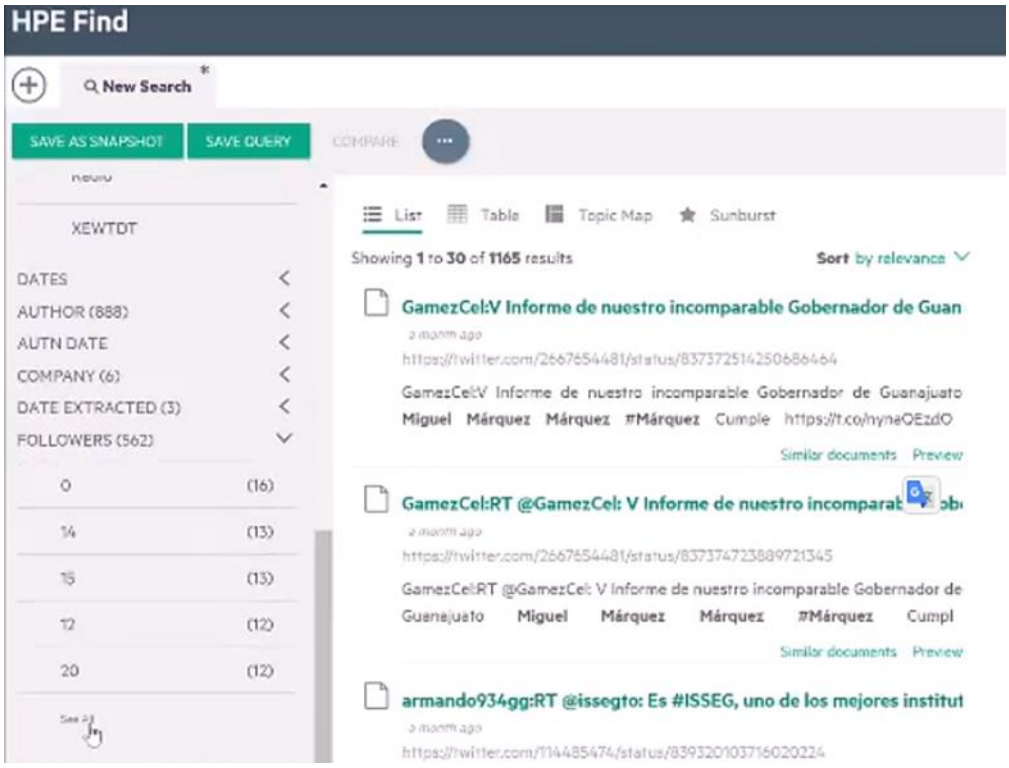
Id. at p. 18.



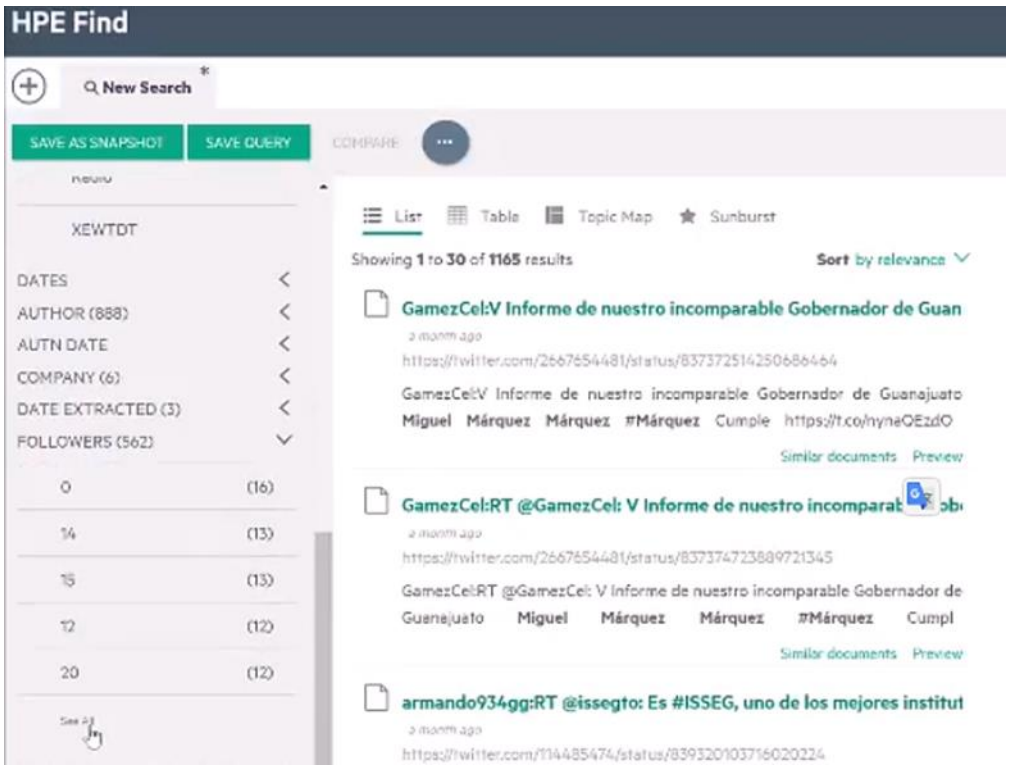
Id. at p. 19. The identifying phrases for all searched documents are displayed in the search results. These search results can be arranged as per different multi-tier hierarchies. In the exemplary case as shown below, the available hierarchies are: dates, Author, Relevancy, etc. associated with documents. Based on the data within the index, hierarchies are identified to which the document belongs. Thus, during a keyword search, the respective hierarchies are identified and results are arranged within them. Such as in the exemplary case, the search results are displayed and arranged within the "Follower" hierarchy.



YouTube Video at 3:43 of 8:17. As mentioned previously, the results can be displayed and arranged within a multi-hierarchy scheme. In an exemplary case, search results are arranged in "Followers" hierarchy. Each identified phrase, related to a document, contains information about the number of followers. Based on this information as previously discussed, these documents are associated to respective category tags of the "Followers" hierarchy.



Id. at 5:12 of 8:17. The search results (e.g., "identifying phrases") containing the searched keyword are displayed to the user.



Id. at 5:30 of 8:17.

18. Errol is entitled to recover from Defendant the damages sustained by Errol as a result of Defendant's infringement of the '166 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

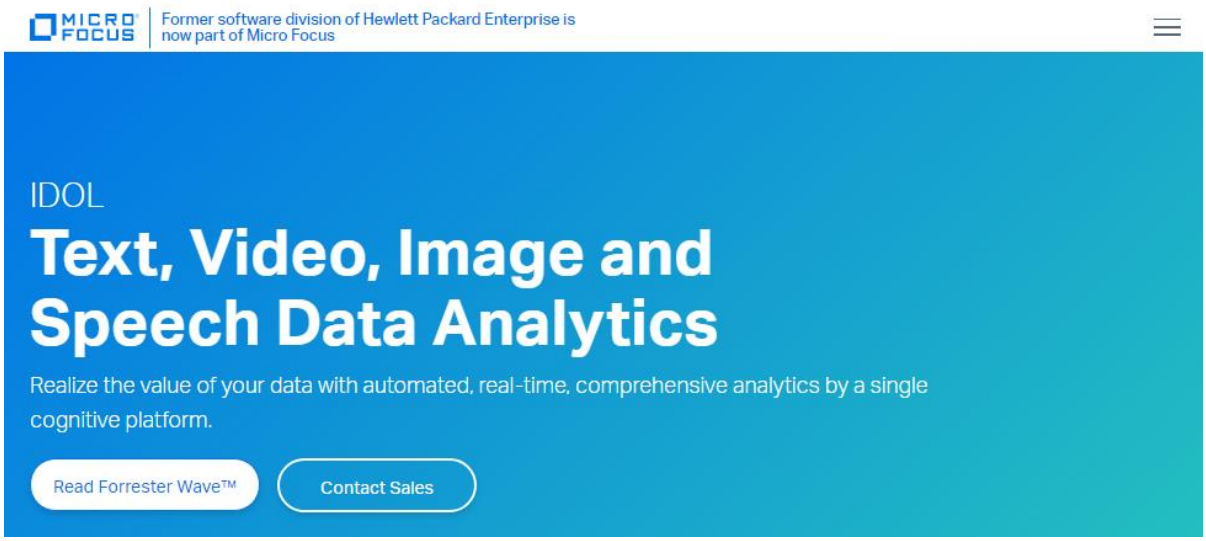
COUNT II – INFRINGEMENT OF U.S. PATENT NO. RE42,167

19. Errol repeats and realleges the allegations of paragraphs 1 through 18 as if fully set forth herein.

20. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe at least claim 29 of the '167 patent by making, using, importing, offering for sale, and/or selling, systems and methods for retrieving information from an informational resource, including, but not limited to, Micro Focus IDOL ("IDOL"), because each and every element is met either literally or equivalently.

21. Upon information and belief, Defendant used IDOL via its internal use and testing in the United States, directly infringing one or more claims of the '167 patent.

22. More specifically, IDOL provides a method for searching (e.g., "retrieving information") relevant documents (e.g., "informational resource") across multiple data repositories.



Overview.

Advanced enterprise search is about providing enterprise search results based upon relevant concepts associated with the search terms. This goes beyond simple key-word search. A conceptual enterprise search example—if you search for Apple, you may see results associated with Apple, Samsung, and Microsoft because IDOL understands that these companies are related, in that they're in the same industry and address similar markets.

Data Sheet at p.2.

Product Highlights

Micro Focus® IDOL is a unified data analytics platform supporting 1000 data formats encompassing text, video, image, and audio content. It enables out-of-the-box access to 150 data repositories behind and beyond your firewall, (for example, Documentum, Dropbox, and such) as well as indexes data without relocation and disruption. Built on proven world-class technology and innovations such as machine learning and deep neural networks, IDOL unlocks hidden insights by revealing trends, patterns, and relationships. With IDOL, you gain an in-depth understanding of user profiles and actions to personalize knowledge delivery. In information search and knowledge discovery, IDOL natural language question answering transforms the end-user experience. It enables simple and contextually relevant dialogues between humans and machines.

Id. at p. 1. IDOL performs various functions, such as categorization, on the documents that it receives from various information sources. Each of these incoming documents is processed individually such as to assign a category to them. Thus, it can be inferred that the incoming documents (forming "informational resources") are separated into individual documents (e.g., "discrete finite elements") before processing.

5. Before storing content in IDOL server

IDOL server stores the content of documents in its Data index (by default this comprises the IDOL server databases News and Archive). The process of storing content in IDOL server is called indexing.

Before you start to index files into IDOL server you need to:

- **decide how you want to store content**
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You can also configure IDOL server to process documents that it receives (for example from an Autonomy connector) before it indexes them. You can set up a simple process by configuring IDOL server to execute a single task on incoming documents, or set up a complex process by configuring IDOL server to combine a number of tasks.

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- categorize documents
- extract information from unstructured data and store it in structured fields
- modify document fields
- write files to disk
- send an http call
- import and categorize the legacy profiles in BIF files
- evaluate the quality of files produced as a result of optical character recognition
- route documents to different tasks
- index documents

Administrator's Guide at p. 63.

Categorization

In categorization, you assign documents to categories according to what the document and the category have in common.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/Improve/Categorization.htm%3FTocPath%3DUse%2520Your%2520Content%7CImprove%7CCategorization%7C_____0 (last accessed June 14, 2018). Once a document (e.g., "discrete finite element") is received, its content is analyzed to identify the categories to which the document belongs. Thus, the documents are classified into categories (i.e., categorical tags).

> Categorization automatically identifies the ideas that documents contain, and classifies these documents according to their content. You can tag the documents according to the category, and you can use the tags as a trigger for a further workflow process, such as approval or examination.

Id.

Document Tagging

Document Tagging is the general process of adding extra information to documents. It includes static additions to the documents (for example, adding information from Eduction into the document) or more dynamic information (for example, marking a document for further analysis or workflow).

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/EnrichContent/Document_Tagging.htm%3FTocPath%3DBefore%2520You%2520Index%7CEnrich%2520Your%2520Content%7C_____5 (last accessed June 14, 2018).

Eduction

Eduction is the process of finding *entities* in documents, and typically extracting them to form additional fields in the document. Entities are words, phrases, or blocks of information.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/EductionAndSentimentAnalysis/Eduction.htm (last accessed June 14, 2018). Documents are indexed and stored in a database and a user can run queries to search for documents in a database.

6. Storing content in IDOL server

IDOL server stores the content of documents in its Data index (by default this comprises the IDOL server databases News and Archive). The process of storing content in IDOL server is called indexing.

Only files in XML or IDX format can be indexed into IDOL server. If the data that you want to index into IDOL server is in XML format, you can index it directly into IDOL server (using a **DREADD** or **DREADDDATA** command), without having to import it first.

If your data is not in XML format, you can import it into XML or IDX format:

- **using a connector**

  The Autonomy connectors (for example, File System Fetch, HTTPFetch, Oracle Fetch and so on) allow you to retrieve documents from different repositories and import them into IDX file format only. Please refer to the appropriate connector manual for further information on how to import documents.

- **manually**

  You can create a text file in XML or IDX format (see **Appendix D: manually creating IDX files** on page 431), which contains the information that you want to index into your IDOL server in specific IDOL server fields.

Once documents have been imported into XML or IDX file format, you can index them into IDOL server:

- **using a connector**

  The Autonomy connectors allow you to index the IDX files that they have created into the IDOL server that they connect to. Please refer to the appropriate connector manual for further information on how to index documents.

- **directly**

  You can index XML and IDX files into an IDOL server using an HTTP request that you can issue from your web browser.

Note: depending on where the data that IDOL server indexes is located, the indexing process takes place in the following order:

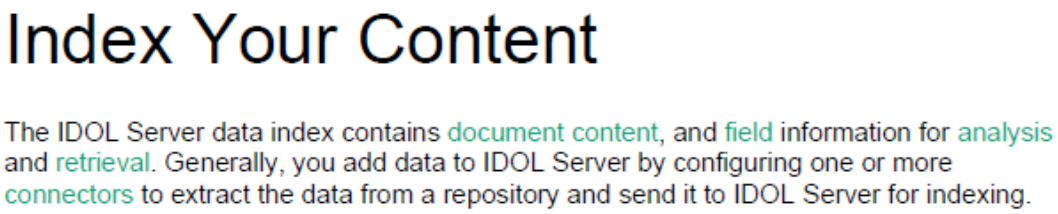
IDOL server indexes a locally accessible file:

1. IDOL server receives a filename.
2. IDOL server opens the file and reads the data.
3. The indexing process takes place

IDOL server receives data over the indexing port:

1. IDOL server receives a stream of data over the port.
2. IDOL server saves the data locally.
3. IDOL server opens the file and reads the data.
4. The indexing process takes place

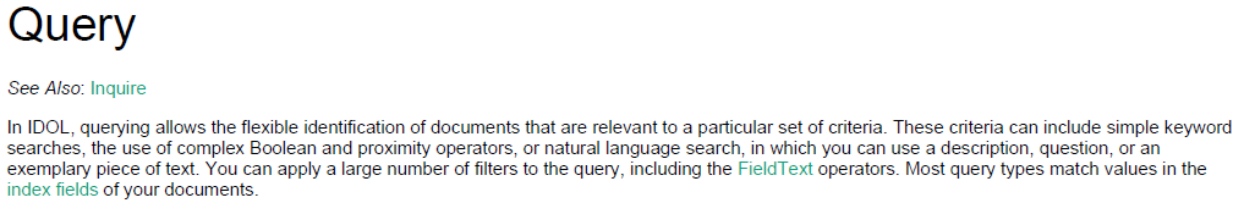
Administrator's Guide at p. 83.



Index Your Content

The IDOL Server data index contains document content, and field information for analysis and retrieval. Generally, you add data to IDOL Server by configuring one or more connectors to extract the data from a repository and send it to IDOL Server for indexing.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/IntroductionTopics/Index_Your_Content.htm (last accessed June 14, 2018).

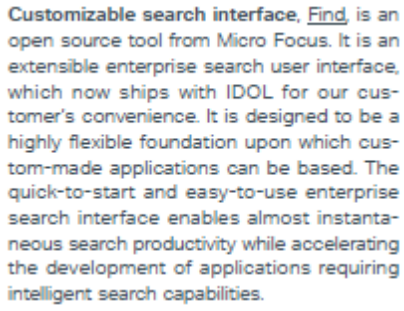


Query

See Also: Inquire

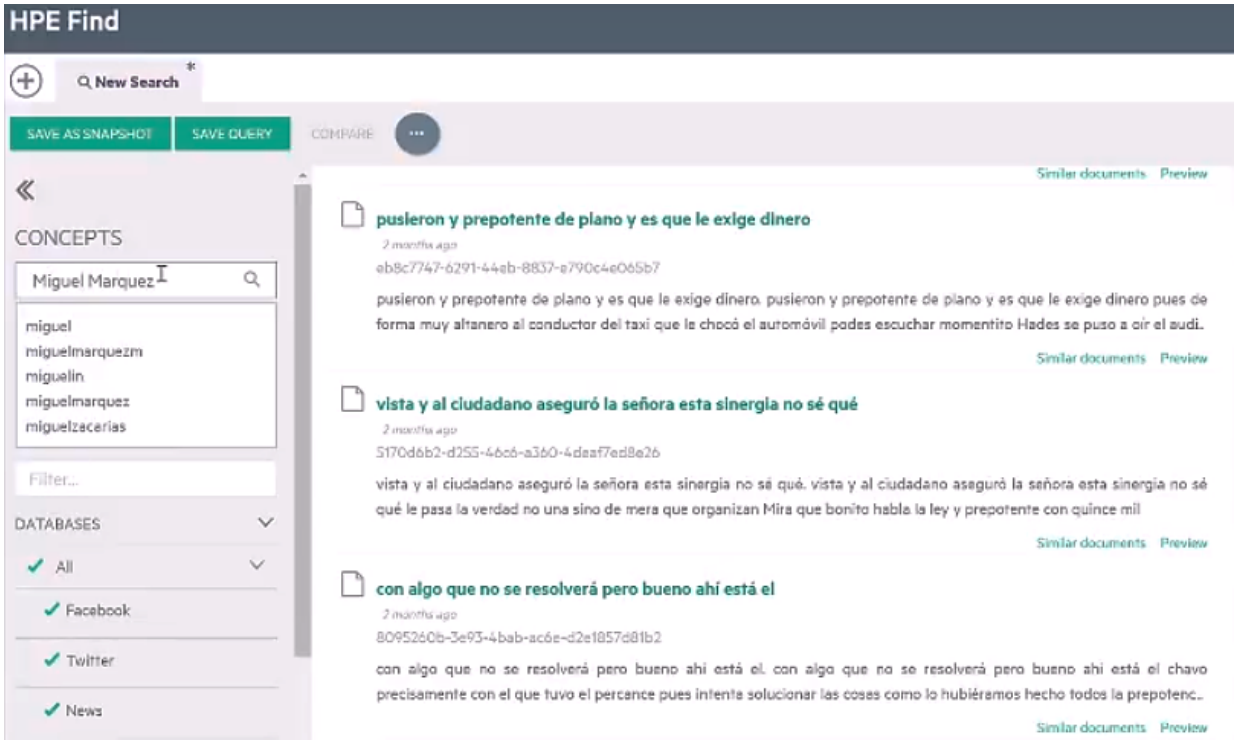
In IDOL, querying allows the flexible identification of documents that are relevant to a particular set of criteria. These criteria can include simple keyword searches, the use of complex Boolean and proximity operators, or natural language search, in which you can use a description, question, or an exemplary piece of text. You can apply a large number of filters to the query, including the FieldText operators. Most query types match values in the index fields of your documents.

https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/html/English/expert/index.html#IDOLExpert/Inquire/Query.htm (last accessed June 14, 2018). The user can provide a search query to the IDOL through its search interface. The search keyword(s) are searched in the index database to identify corresponding results.



Customizable search interface, Find, is an open source tool from Micro Focus. It is an extensible enterprise search user interface, which now ships with IDOL for our customer's convenience. It is designed to be a highly flexible foundation upon which custom-made applications can be based. The quick-to-start and easy-to-use enterprise search interface enables almost instantaneous search productivity while accelerating the development of applications requiring intelligent search capabilities.

Data Sheet at p. 3.



https://www.youtube.com/watch?v=99tBeKk1U30 ("YouTube Video") at 3:42 of 8:17 (last accessed June 14, 2018). Based on the search query, the database containing indexed information is searched to identify any records matching the search query. These records store contents of the indexed documents and link to the documents. Thus, the link to the document associates the database record to the corresponding document.

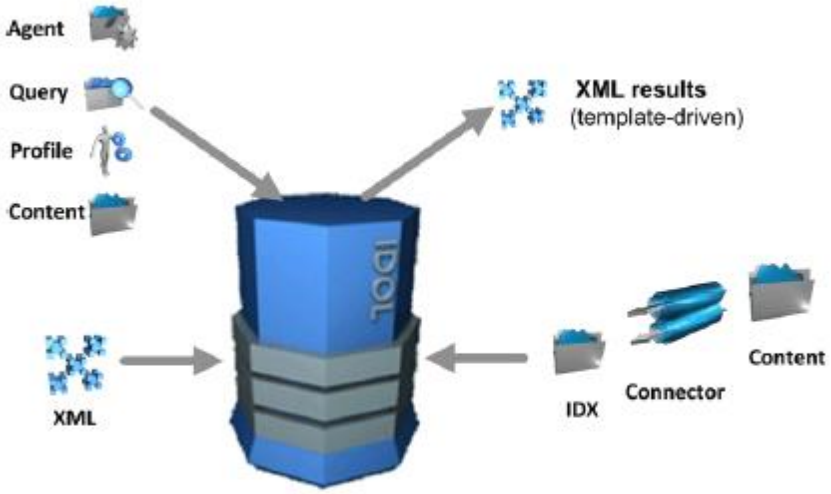
> **Index Fields**
>
> IDOL server processes index fields linguistically. It removes stop words, and stems each term before storing the terms. This process allows IDOL to return documents that match a conceptual query or contain keyword search terms.

HPE IDOL: IDOL Getting Started ("Getting Started") at p. 95 (available at https://my.vertica.com/docs/IDOL/Servers/IDOLServer/11.0/Guides/pdf/English/IDOL_11.0_GettingStarted_en.pdf (last accessed June 14, 2018)).

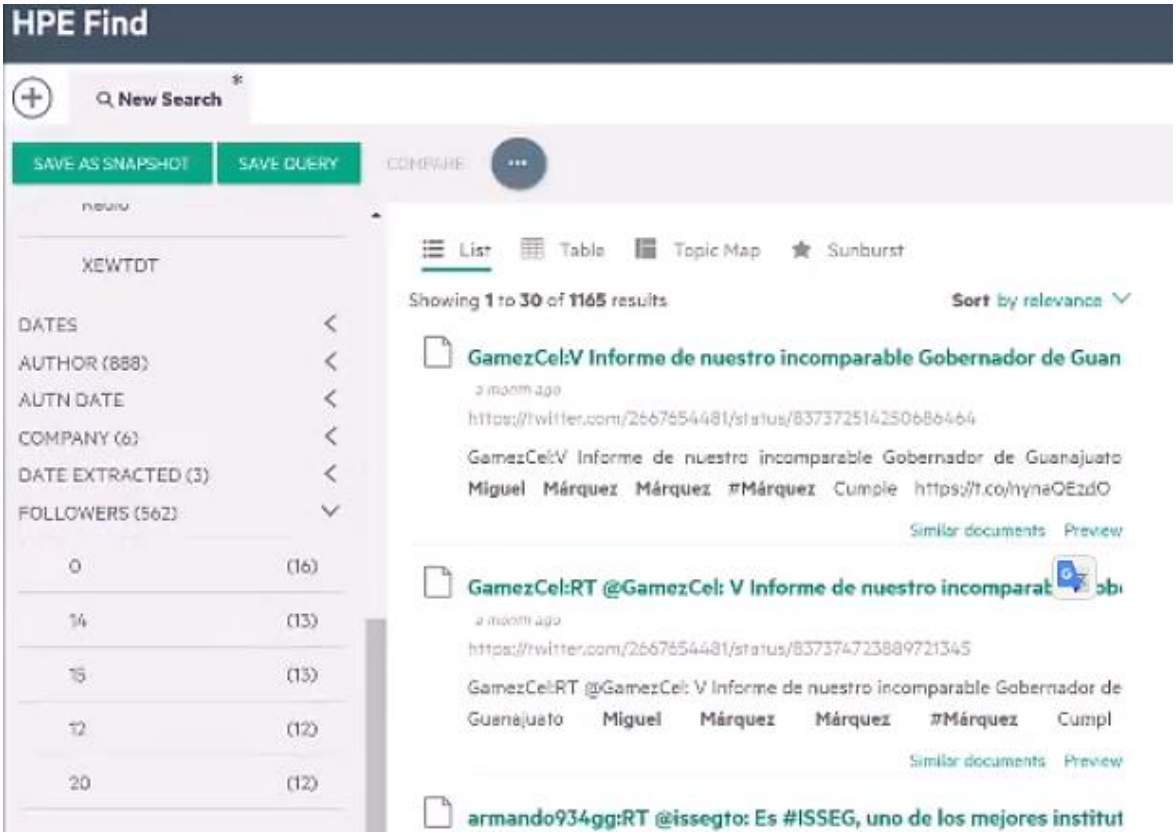
Index and Query

You index documents into IDOL in HPE IDOL IDX format or in XML format (directly or using a Connector). IDOL stores the concepts of the document. In response to queries, agents, profiles or content, it returns a link to the result document. IDOL also returns a percentage weighting, which indicates how relevant the result document is to the original query.

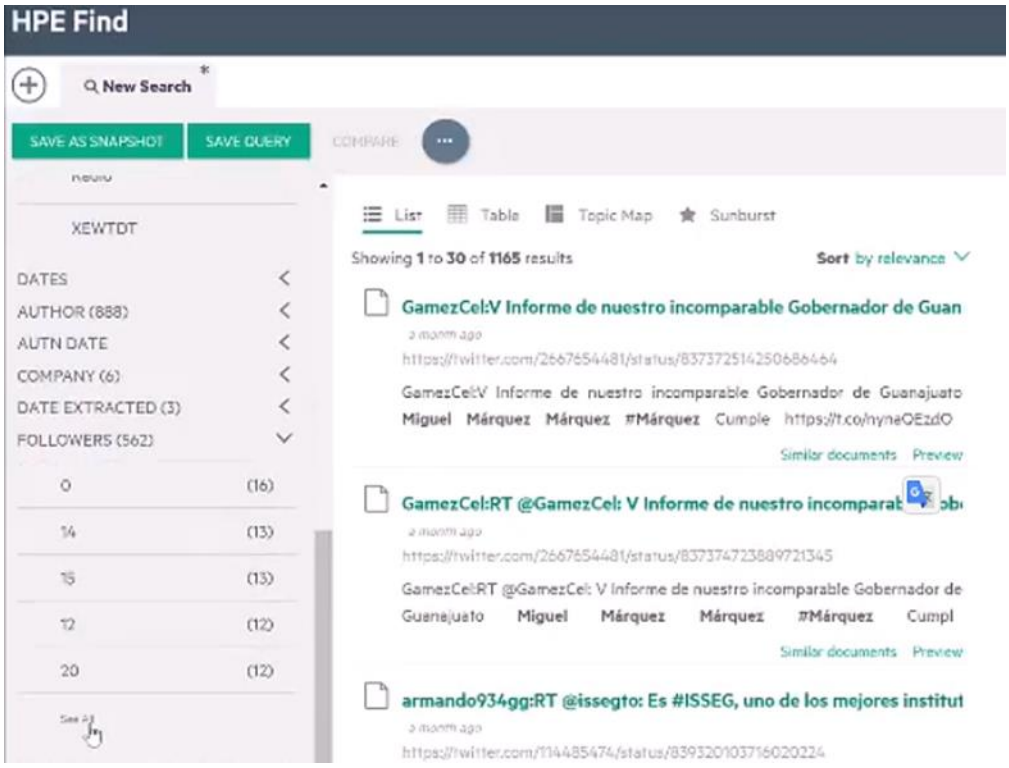
Id. at p. 18.



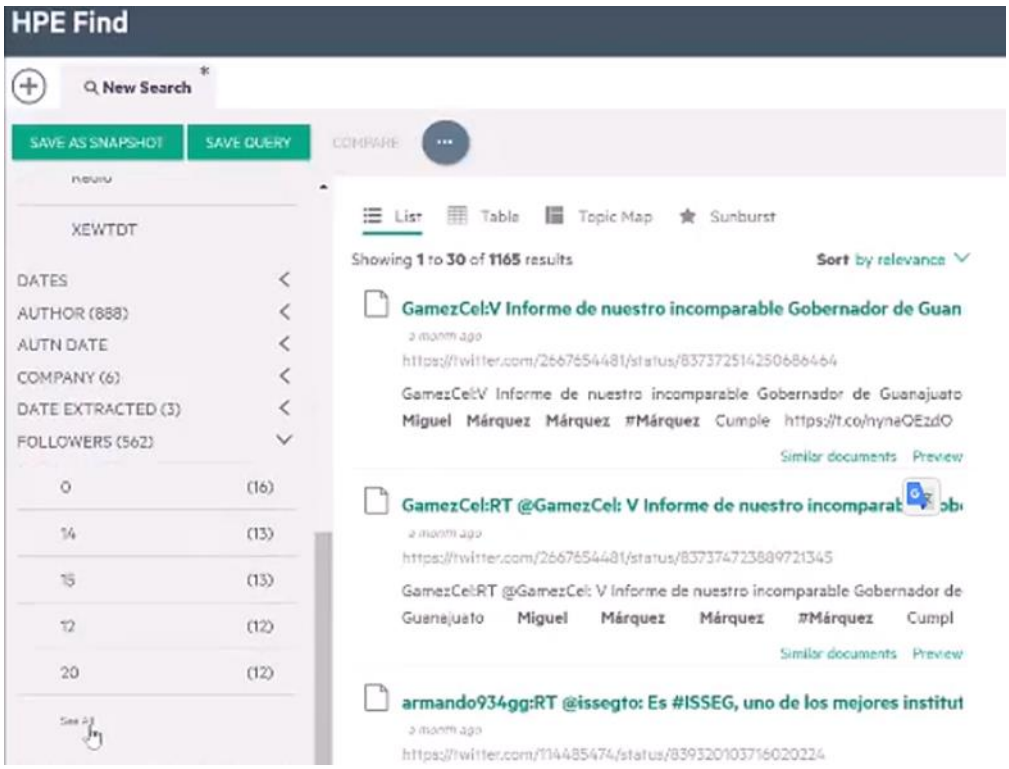
Id. at p. 19. The identifying phrases for all searched documents are displayed in the search results. These search results can be arranged as per different multi-tier hierarchies. In the exemplary case as shown below, the available hierarchies are: dates, Author, Relevancy, etc. associated with documents. Based on the data within the index, hierarchies are identified to which the document belongs. Thus, during a keyword search, the respective hierarchies are identified and results are arranged within them. Such as in the exemplary case, the search results are displayed arranged within the "Follower" hierarchy.



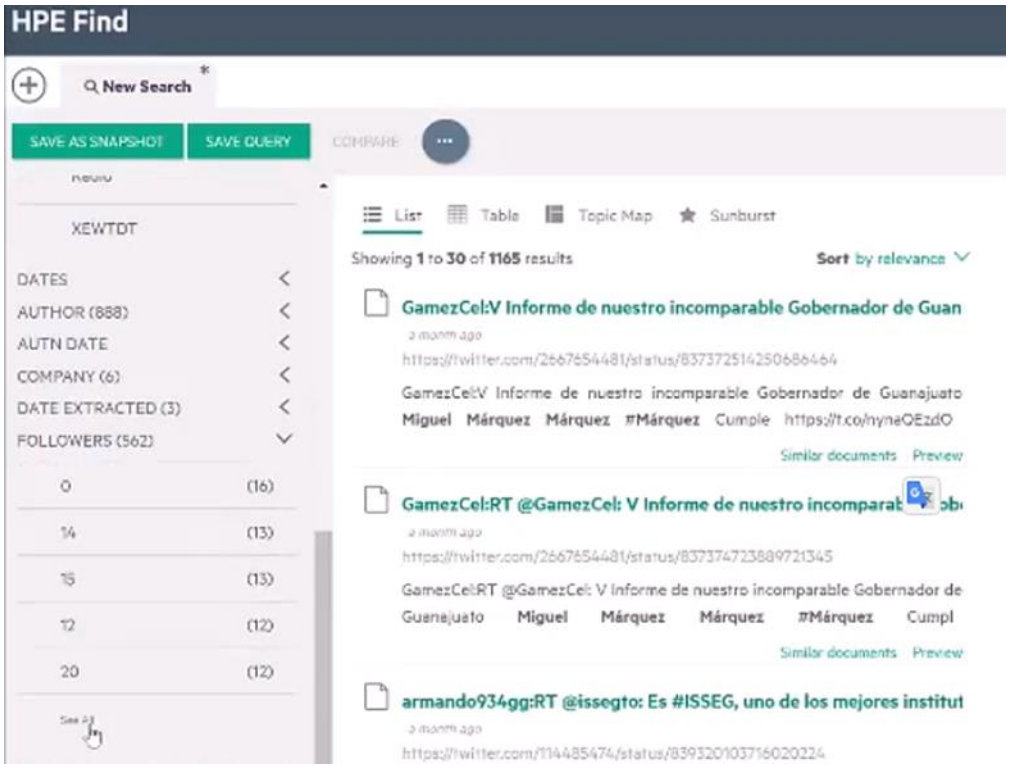
YouTube Video at 3:43 of 8:17. As mentioned previously, the results can be displayed arranged within a multi-hierarchy scheme. In an exemplary case, search results are arranged in 'Followers' hierarchy. Each identified phrase, related to a document, contains information about the number of followers. Based on this information as previously discussed, these documents are associated to respective category tags of the "Followers" hierarchy.



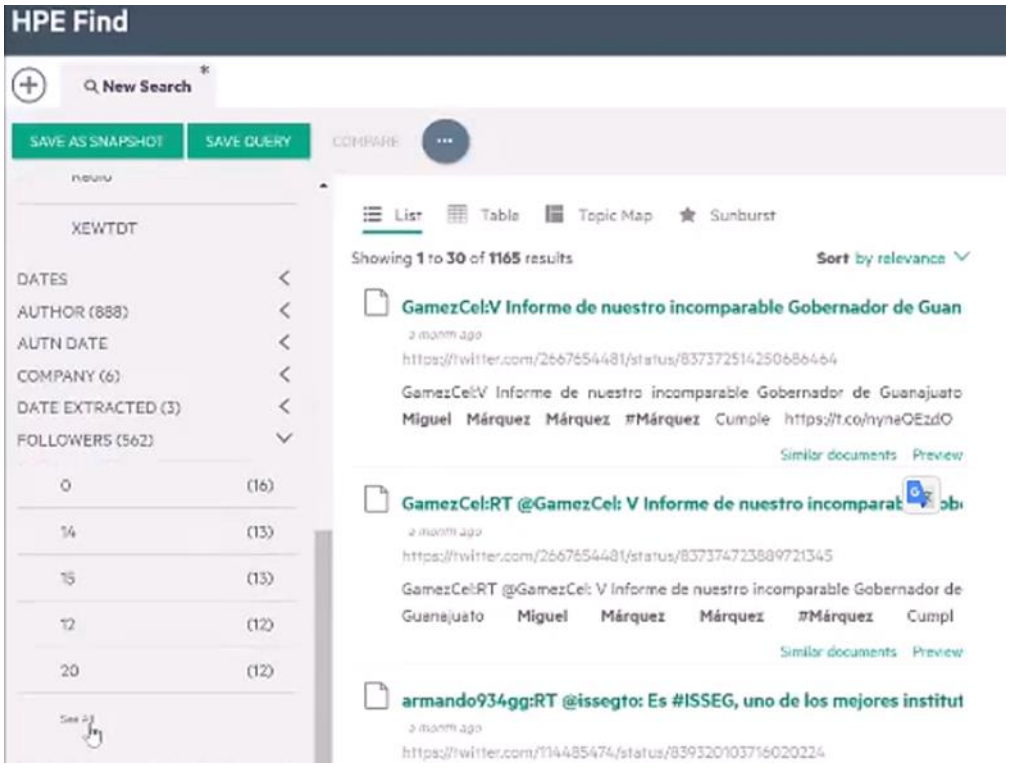
Id. at 5:12 of 8:17. The search results (e.g., "identifying phrases") containing the searched keyword are displayed to the user.



Id. at 5:30 of 8:17. The user can click (e.g., "receiving a selection") on "Similar documents" (e.g., "identifying phrase") to browse other documents (e.g., "accessing the discrete finite element corresponding to the selected identifying phrase") that are similar to the current document.



Id. at 5:30 of 8:17. On the search result page, if a user selects the "Similar documents" link of a desired search result, the other documents (e.g., "related discrete finite element") similar to the desired document (e.g., "other related, discrete finite elements") will be fetched. All these documents will be displayed to the user as a set of documents (e.g., "a new informational resource").



Id. at 5:30 of 8:17.

Create Template Files

HPE Find processes template by `handlebars.js`. Each template file must produce HTML output that represents one document.

HPE Find runs the templates with the following Handlebars context:

```
interface ResultTemplateData {
   reference: string;
   title: string;

    date: string;
    database: string;
    promotionName: string|undefined;
    summary: string; // The highlighted summary, should not be HTML escaped
    url: string|undefined; // URL of the original document or media file
    icon: string; // Icon class based on content type
    similarDocumentsUrl: string|undefined; // URL for linking to the similar
 documents view, only in result and promotion
    thumbnailSrc: string|undefined, // Source attribute to load the thumbnail in an
 <img> tag
    age: string; // Internationalised age of the document (e.g. "3 years ago")
    fields: {id: string, values: string[], displayName: string, advanced: boolean}
 [];
 }
```

HPE Find: Administrator Guide at pp. 66-67 (available at https://my.vertica.com/docs/IDOL_11_4/IDOL/Interfaces/Find/11.4/Guides/pdf/English/Find_11.4_Administration_en.pdf (last accessed June 14, 2018)).

23. Errol is entitled to recover from Defendant the damages sustained by Errol as a result of Defendant's infringement of the '167 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

Errol hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Errol requests that this Court enter judgment against Defendant as follows:

A. An adjudication that Defendant has infringed the '166 and '167 patents;

B. An award of damages to be paid by Defendant adequate to compensate Errol for Defendant's past infringement of the '166 and '167 patents and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Errol's reasonable attorneys' fees; and

D. An award to Errol of such further relief at law or in equity as the Court deems just and proper.

Dated: June 14, 2018

STAMOULIS & WEINBLATT LLC

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