

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

CROGA INNOVATIONS LTD.,

Plaintiff,

v.

PALO ALTO NETWORKS, INC.,

Defendant.

Case No. 2:24-cv-208

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT  
AGAINST PALO ALTO NETWORKS, INC.**

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Croga Innovations Limited (“Plaintiff” or “Croga”) makes the following allegations against Defendant Palo Alto Networks, Inc. (“Defendant” or “PAN”):

**INTRODUCTION**

1. This complaint arises from PAN’s unlawful infringement of the following United States patent owned by Plaintiff, which relates to improvements in computer networking systems: United States Patent No. 11,223,601 (“the ’601 Patent” or the “Asserted Patent”).

**PARTIES**

2. Plaintiff Croga Innovations Limited is a private company limited by shares organized and existing under the laws of Ireland, with its principal place of business at The Hyde Building, Suite 23, The Park, Carrickmines, Dublin 18, Ireland. Croga is the sole owner by assignment of all rights, title, and interest in the Asserted Patent, including the right to recover damages for past, present, and future infringement.

3. On information and belief, Defendant Palo Alto Networks, Inc. is a Delaware corporation with its principal place of business at 3000 Tannery Way, Santa Clara, CA 95054. PAN is registered to do business in the State of Texas and may be served through its registered agent Corporation Service Company dba CSC – Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

### **JURISDICTION AND VENUE**

4. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over PAN in this action because PAN has committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over PAN would not offend traditional notions of fair play and substantial justice. PAN maintains several places of business within the State, including at 3901 North Dallas Parkway, Plano, TX 75093. PAN, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Asserted Patent. PAN is registered to do business in the State of Texas, and has appointed as their registered agent, Corporation Service Company d/b/a CSC – Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701, for service of process.

6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). PAN is registered to do business in Texas, and upon information and belief, PAN has transacted business in this District and has committed acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the

Asserted Patent. PAN has regular and established places of business in this District, including at 3901 North Dallas Parkway, Plano, TX 75093.

**COUNT I**

**INFRINGEMENT OF U.S. PATENT NO. 11,223,601**

7. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

8. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 11,223,601, titled “Network isolation for collaboration software.” The ’601 Patent was duly and legally issued by the United States Patent and Trademark Office on January 11, 2022. The ’601 Patent is valid and enforceable. A true and correct copy of the ’601 Patent is attached hereto as Exhibit 1.

9. PAN makes, uses, offers for sale, sells, and/or imports certain products, including without limitation PAN’s Remote Browser Isolation service (the “Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’601 Patent. Identification of the accused products will be provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

10. The Accused Products satisfy all claim limitations of one or more claims of the ’601 Patent. A claim chart comparing exemplary independent claim 1 of the ’601 Patent to representative Accused Products is attached as Exhibit 2.

11. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, PAN has injured Plaintiff and is liable for infringement of the ’601 Patent pursuant to 35 U.S.C. § 271(a).

12. PAN also knowingly and intentionally induces infringement of one or more claims of the '601 Patent in violation of 35 U.S.C. § 271(b). At least as of the filing and service of this complaint, PAN has knowledge of the '601 Patent and the infringing nature of the Accused Products through, for example, the '601 Patent claim chart served therewith. Despite this knowledge of the '601 Patent, PAN continues to actively encourage and instruct its customers and end users (for example, through user manuals and online instruction materials on its website and materials cited in Exhibit 2) to use the Accused Products in ways that directly infringe the '601 Patent. For example, PAN advertises the capabilities of the remote browser isolation functionality:

RBI is a service that isolates and transfers all browsing activity away from the user's managed devices and corporate networks to an outside entity such as Prisma Access, which secures and isolates potentially malicious code and content within their platform. Natively integrated with Prisma Access, RBI allows you to apply isolation profiles easily to existing security policies. Isolation profiles can restrict many user controls such as copy and paste actions, keyboard inputs, and sharing options like file uploading, downloading, and printing files to keep sensitive data and information secure. All traffic in isolation undergoes analysis and threat prevention provided by Cloud-Delivered Security Services (CDSS) such as Advanced Threat Prevention, Advanced WildFire, Advanced URL Filtering, DNS Security, and SaaS Security.

*See* Ex. 3 (Palo Alto Networks, TechDocs – “Strata Cloud Manager Release Notes”); *see also* Ex.

4 (“What Is Remote Browser Isolation (RBI)?”) (<https://www.paloaltonetworks.com/cyberpedia/what-is-remote-browser-isolation>).

Further, PAN provides prospective customers with additional instructions, manuals, and “support options” for its RBI feature. *See* Ex. 3 at 54-55. PAN provides these instructions, user manuals, and other materials knowing and intending (or with willful blindness to the fact) that its customers and end users will commit these infringing acts. PAN also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the '601 Patent, thereby specifically intending for and inducing its customers to infringe the '601 Patent through the customers' normal and customary use of the Accused Products.

13. PAN has also infringed, and continues to infringe, one or more claims of the '601 Patent by selling, offering for sale, or importing into the United States, the Accused Products, knowing that the Accused Products constitute a material part of the inventions claimed in the '601 Patent, are especially made or adapted to infringe the '601 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use. At least as of the filing and service of this complaint, PAN has knowledge of the '601 Patent and the infringing nature of the Accused Products through, for example, the '601 Patent claim chart served therewith. PAN has been, and currently is, contributorily infringing the '601 Patent in violation of 35 U.S.C. §§ 271(c) and/or (f). For example, PAN's remote browser isolation (RBI) constitutes a material part of the inventions claimed in the '601 Patent, are especially made or adapted to infringe the '601 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use, as demonstrated by the evidence in Exhibit 2.

14. On information and belief, Plaintiff (including its predecessors and any licensees) complied with 35 U.S.C. § 287 during the relevant time period because Plaintiff, any predecessor assignees to the '601 Patent, and any licensees did not make, offer for sale, or sell products that practice(d) the '601 Patent during the relevant time period or were not required to mark during the relevant time period.

15. As a result of PAN's direct infringement of the '601 Patent, Plaintiff is entitled to monetary damages (past, present, and future) in an amount adequate to compensate for PAN's infringement, but in no event less than a reasonable royalty for the use made of the invention by PAN, together with interest and costs as fixed by the Court.

16. As a result of PAN's indirect infringement of the '601 Patent, Plaintiff is entitled to monetary damages (present and future) in an amount adequate to compensate for PAN's

infringement, but in no event less than a reasonable royalty for the use made of the invention by PAN, together with interest and costs as fixed by the Court, accruing as of the time PAN obtained knowledge of the '601 Patent.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that PAN has infringed, either literally and/or under the doctrine of equivalents, the '601 Patent;
- b. A judgment and order requiring PAN to pay Plaintiff its damages (past, present, and future), costs, expenses, and pre-judgment and post-judgment interest for PAN's infringement of the '601 Patent;
- c. A judgment and order requiring PAN to pay Plaintiff compulsory ongoing licensing fees, as determined by the Court in equity.
- d. A judgment and order requiring PAN to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest and compensation for infringing products released after the filing of this case that are not colorably different from the accused products;
- e. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against PAN; and
- f. Any and all other relief as the Court may deem appropriate and just under the circumstances.

**DEMAND FOR JURY TRIAL**

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: March 22, 2024

Respectfully submitted,

By: /s/ Brett E. Cooper

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