



5. At all times since the issuance of the '425 patent, Halliburton has been and still is the owner of the '425 patent.

6. Defendant has been and still is infringing the '425 patent by using, selling, and offering to sell well treatment services embodying the patented invention, and by inducing and contributing to the infringement of the '425 patent by others.

7. Halliburton has given Defendant written notice of the '425 patent.

8. Halliburton has demanded in writing that Defendant immediately and permanently cease all infringement of the '425 patent.

9. Defendant will continue to infringe the '425 patent unless enjoined by this Court.

10. Upon information and belief, Defendant's conduct constitutes knowing and willful infringement of the '425 patent, such that Halliburton is entitled to an increase in the damages up to three times the amount found or assessed, as provided by 35 U.S.C. § 284.

11. Upon information and belief, Defendant's conduct presents an exceptional case such that Halliburton is entitled to an award of its reasonable attorney's fees, as provided by 35 U.S.C. § 285.

12. Plaintiff Halliburton demands a jury trial on its claims.

WHEREFORE, Plaintiff demands that:

1. Defendant, its officers, directors, servants, employees, and attorneys be preliminarily enjoined pending this action and permanently from infringement of the '425 patent in any manner;

2. Defendant, its officers, directors, servants, employees, and attorneys be required to deliver up to Plaintiff Halliburton an accounting for damages for all infringements upon, directly or indirectly or otherwise, the '425 patent;

3. Defendant be ordered to pay to Plaintiff Halliburton an amount of damages adequate to compensate Halliburton for the infringement of the '425 patent, as provided by 35 U.S.C. § 284;

4. Defendant be required to pay to Plaintiff Halliburton increased damages up to three times the amount found or assessed, as provided by 35 U.S.C. § 284;

5. Defendant be required to pay Plaintiff its reasonable attorney's fees, as provided by 35 U.S.C. § 285;

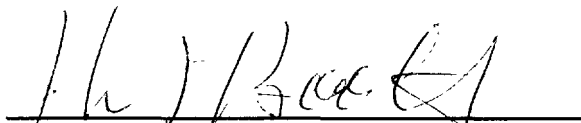
6. Defendant be required to pay Plaintiff its costs incurred in this action;

7. Defendant be required to pay Plaintiff Halliburton pre-judgment and post-judgment interest; and

8. Plaintiff be granted such other and further relief as the Court may deem just and equitable.

Dated: 5/25/00

Respectfully submitted,



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