

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
Sherman Division**

ROUND ROCK RESEARCH, LLC)
)
 Plaintiff,)
)
 v.)
)
 ORACLE CORPORATION and)
 DELL, INC.)
)
 Defendants.)

Civil Action No. 4:11cv332
JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Round Rock Research, LLC (“Round Rock Research”), for its Complaint against Defendants Oracle Corporation (“Oracle”) and Dell, Inc. (“Dell”) hereby alleges as follows:

The Parties

1. Plaintiff Round Rock Research is a Delaware limited liability company with its principal place of business at Mount Kisco, New York 10549.
2. Defendant Oracle is a Delaware corporation with its principal place of business at 500 Oracle Parkway, Redwood City, California 94065. Oracle is qualified to do business in the state of Texas, Filing No. 10507206, and has appointed Corporation Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701, as its agent for service of process.
3. Defendant Dell is a Delaware corporation with its principal place of business at 1 Dell Way, Round Rock, Texas 78682. Dell is qualified to do business in the state of Texas, Filing No. 7444706, and has appointed Corporation Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701, as its agent for service of process.

Nature of the Action

4. This is a civil action for the infringement of United States Patent Nos. 6,088,816 (“the ’816 Patent”) (attached as Exhibit A); 6,145,098 (“the ’098 Patent”) (attached as Exhibit B); 6,170,067 (“the ’067 Patent”) (attached as Exhibit C); 6,199,173 (“the ’173 Patent”) (attached as Exhibit D); 6,243,838 (“the ’838 Patent”) (attached as Exhibit E); 6,266,721 (“the ’721 Patent”) (attached as Exhibit F); 6,425,006 (“the ’006 Patent”) (attached as Exhibit G); 6,553,416 (“the ’416 Patent”) (attached as Exhibit H); and 6,681,342 (“the ’342 Patent”) (attached as Exhibit I) (collectively, “the Patents-in-Suit”) under the Patent Laws of the United States 35 U.S.C. §1 *et seq.*

Jurisdiction and Venue

5. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendants Oracle and Dell because, among other things, each Defendant has committed, aided, abetted, contributed to, and/or participated in the commission of patent infringement in this judicial district and elsewhere that led to foreseeable harm and injury to Round Rock Research.

7. This Court also has personal jurisdiction over Defendants Oracle and Dell because, among other things, Defendants have established minimum contacts within the forum such that the exercise of jurisdiction over Defendants will not offend traditional notions of fair play and substantial justice. Moreover, Defendants have placed products that practice the claimed inventions of the Patents-in-Suit into the stream of commerce with the reasonable expectation and/or knowledge that purchasers and users of such products were located within this judicial district. And Defendants sold, advertised, marketed, and distributed in this judicial district products that practice the claimed inventions of the Patents-in-Suit.

8. Venue is proper in this judicial district as to each Defendant pursuant to 28 U.S.C. §§ 1391 and 1400.

The Patents-In-Suit

9. On July 11, 2000, the '816 Patent, titled "Method Of Displaying System Status," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '816 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '816 Patent.

10. On November 7, 2000, the '098 Patent, titled "System For Displaying System Status," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '098 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '098 Patent.

11. On January 2, 2001, the '067 Patent, titled "System For Automatically Reporting A System Failure In A Server," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '067 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '067 Patent.

12. On March 6, 2001, the '173 Patent, titled "Method For Mapping Environmental Resources To Memory For Program Access," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '173 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '173 Patent.

13. On June 5, 2001, the '838 Patent, titled "Method For Automatically Reporting A System Failure In A Server," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '838 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '838 Patent.

14. On July 24, 2001, the '721 Patent, titled "System Architecture For Remote Access And Control Of Environmental Management," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '721 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '721 Patent.

15. On July 23, 2002, the '006 Patent, titled "Alert Configurator And Manager," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '006 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '006 Patent.

16. On April 22, 2003, the '416 Patent, titled "Managing Computer System Alerts," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '416 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '416 Patent.

17. On January 20, 2004, the '342 Patent, titled "Diagnostic And Managing Distributed Processor System," was duly and legally issued by the United States Patent and Trademark Office. Round Rock Research is the assignee of all rights, title, and interest in the '342 Patent, and it possesses all rights to sue and recover for any current or past infringement of the '342 Patent.

Count I

Infringement of U.S. Patent No. 6,088,816

18. Paragraphs 1-17 are incorporated by reference as if fully restated herein.

19. Oracle has infringed and continues to infringe the '816 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system, such as the Oracle Integrated Lights-Out Manager ("ILOM"). Oracle has also indirectly

infringed and continues to indirectly infringe the '816 Patent by encouraging its customers to implement and practice the claims of the '816 Patent, including Oracle's customers who make, use, sell, and/or offer to sell servers implementing Oracle's remote monitoring systems, such as Verio, Inc.

20. Dell has infringed and continues to infringe the '816 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card ("DRAC"). Dell has also indirectly infringed and continues to indirectly infringe the '816 Patent by encouraging its customers to implement and practice the claims of the '816 Patent, including Dell's customers who make, use, sell, and/or offer to sell servers implementing Dell's remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

21. Round Rock Research has been and continues to be damaged by Defendants' infringement of the '816 Patent.

22. Dell has willfully infringed and continues to willfully infringe the '816 Patent. Dell has continued its infringement despite its knowledge of the '816 Patent, as evidenced by its own patent prosecution activities, and despite having received written notice of its infringement from Round Rock Research.

Count II

Infringement of U.S. Patent No. 6,145,098

23. Paragraphs 1-22 are incorporated by reference as if fully restated herein.

24. Oracle has infringed and continues to infringe the '098 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system, such as the Oracle Integrated Lights-Out Manager ("ILOM"). Oracle has also indirectly

infringed and continues to indirectly infringe the '098 Patent by encouraging its customers to implement and practice the claims of the '098 Patent, including Oracle's customers who make, use, sell, and/or offer to sell servers implementing Oracle's remote monitoring systems, such as Verio, Inc.

25. Dell has infringed and continues to infringe the '098 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card ("DRAC"). Dell has also indirectly infringed and continues to indirectly infringe the '098 Patent by encouraging its customers to implement and practice the claims of the '098 Patent, including Dell's customers who make, use, sell, and/or offer to sell servers implementing Dell's remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

26. Round Rock Research has been and continues to be damaged by Defendants' infringement of the '098 Patent.

27. Dell has willfully infringed and continues to willfully infringe the '098 Patent. Dell has continued its infringement despite its knowledge of the '098 Patent, as evidenced by its own patent prosecution activities, and despite having received written notice of its infringement from Round Rock Research.

Count III

Infringement of U.S. Patent No. 6,170,067

28. Paragraphs 1-27 are incorporated by reference as if fully restated herein.

29. Oracle has infringed and continues to infringe the '067 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system,

such as the Oracle Integrated Lights-Out Manager (“ILOM”). Oracle has also indirectly infringed and continues to indirectly infringe the ’067 Patent by encouraging its customers to implement and practice the claims of the ’067 Patent, including Oracle’s customers who make, use, sell, and/or offer to sell servers implementing Oracle’s remote monitoring systems, such as Verio, Inc.

30. Dell has infringed and continues to infringe the ’067 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card (“DRAC”). Dell has also indirectly infringed and continues to indirectly infringe the ’067 Patent by encouraging its customers to implement and practice the claims of the ’067 Patent, including Dell’s customers who make, use, sell, and/or offer to sell servers implementing Dell’s remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

31. Round Rock Research has been and continues to be damaged by Defendants’ infringement of the ’067 Patent.

32. Dell has willfully infringed and continues to willfully infringe the ’067 Patent. Dell has continued its infringement of the ’067 Patent despite having received written notice of its infringement from Round Rock Research.

Count IV

Infringement of U.S. Patent No. 6,199,173

33. Paragraphs 1-32 are incorporated by reference as if fully restated herein.

34. Oracle has infringed and continues to infringe the ’173 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system,

such as the Oracle Integrated Lights-Out Manager (“ILOM”). Oracle has also indirectly infringed and continues to indirectly infringe the ’173 Patent by encouraging its customers to implement and practice the claims of the ’173 Patent, including Oracle’s customers who make, use, sell, and/or offer to sell servers implementing Oracle’s remote monitoring systems, such as Verio, Inc.

35. Dell has infringed and continues to infringe the ’173 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card (“DRAC”). Dell has also indirectly infringed and continues to indirectly infringe the ’173 Patent by encouraging its customers to implement and practice the claims of the ’173 Patent, including Dell’s customers who make, use, sell, and/or offer to sell servers implementing Dell’s remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

36. Round Rock Research has been and continues to be damaged by Defendants’ infringement of the ’173 Patent.

37. Dell has willfully infringed and continues to willfully infringe the ’173 Patent. Dell has continued its infringement despite its knowledge of the ’173 Patent, as evidenced by its own patent prosecution activities, and despite having received written notice of its infringement from Round Rock Research.

Count V

Infringement of U.S. Patent No. 6,243,838

38. Paragraphs 1-37 are incorporated by reference as if fully restated herein.

39. Oracle has infringed and continues to infringe the ’838 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing

systems, including, but not limited to, Oracle servers implementing a remote monitoring system, such as the Oracle Integrated Lights-Out Manager (“ILOM”). Oracle has also indirectly infringed and continues to indirectly infringe the ’838 Patent by encouraging its customers to implement and practice the claims of the ’838 Patent, including Oracle’s customers who make, use, sell, and/or offer to sell servers implementing Oracle’s remote monitoring systems, such as Verio, Inc.

40. Dell has infringed and continues to infringe the ’838 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card (“DRAC”). Dell has also indirectly infringed and continues to indirectly infringe the ’838 Patent by encouraging its customers to implement and practice the claims of the ’838 Patent, including Dell’s customers who make, use, sell, and/or offer to sell servers implementing Dell’s remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

41. Round Rock Research has been and continues to be damaged by Defendants’ infringement of the ’838 Patent.

42. Dell has willfully infringed and continues to willfully infringe the ’838 Patent. Dell has continued its infringement despite its knowledge of the ’838 Patent, as evidenced by its own patent prosecution activities, and despite having received written notice of its infringement from Round Rock Research.

Count VI

Infringement of U.S. Patent No. 6,266,721

43. Paragraphs 1-42 are incorporated by reference as if fully restated herein.

44. Oracle has infringed and continues to infringe the ’721 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by

making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system, such as the Oracle Integrated Lights-Out Manager (“ILOM”). Oracle has also indirectly infringed and continues to indirectly infringe the ’721 Patent by encouraging its customers to implement and practice the claims of the ’721 Patent, including Oracle’s customers who make, use, sell, and/or offer to sell servers implementing Oracle’s remote monitoring systems, such as Verio, Inc.

45. Dell has infringed and continues to infringe the ’721 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card (“DRAC”). Dell has also indirectly infringed and continues to indirectly infringe the ’721 Patent by encouraging its customers to implement and practice the claims of the ’721 Patent, including Dell’s customers who make, use, sell, and/or offer to sell servers implementing Dell’s remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

46. Round Rock Research has been and continues to be damaged by Defendants’ infringement of the ’721 Patent.

47. Dell has willfully infringed and continues to willfully infringe the ’721 Patent. Dell has continued its infringement despite its knowledge of the ’721 Patent, as evidenced by its own patent prosecution activities, and despite having received written notice of its infringement from Round Rock Research.

Count VII

Infringement of U.S. Patent No. 6,425,006

48. Paragraphs 1-47 are incorporated by reference as if fully restated herein.

49. Oracle has infringed and continues to infringe the '006 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system, such as the Oracle Integrated Lights-Out Manager (“ILOM”). Oracle has also indirectly infringed and continues to indirectly infringe the '006 Patent by encouraging its customers to implement and practice the claims of the '006 Patent, including Oracle’s customers who make, use, sell, and/or offer to sell servers implementing Oracle’s remote monitoring systems, such as Verio, Inc.

50. Dell has infringed and continues to infringe the '006 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card (“DRAC”). Dell has also indirectly infringed and continues to indirectly infringe the '006 Patent by encouraging its customers to implement and practice the claims of the '006 Patent, including Dell’s customers who make, use, sell, and/or offer to sell servers implementing Dell’s remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

51. Round Rock Research has been and continues to be damaged by Defendants’ infringement of the '006 Patent.

52. Dell has willfully infringed and continues to willfully infringe the '006 Patent. Dell has continued its infringement of the '006 Patent despite having received written notice of its infringement from Round Rock Research.

Count VIII

Infringement of U.S. Patent No. 6,553,416

53. Paragraphs 1-52 are incorporated by reference as if fully restated herein.

54. Oracle has infringed and continues to infringe the '416 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system, such as the Oracle Integrated Lights-Out Manager ("ILOM"). Oracle has also indirectly infringed and continues to indirectly infringe the '416 Patent by encouraging its customers to implement and practice the claims of the '416 Patent, including Oracle's customers who make, use, sell, and/or offer to sell servers implementing Oracle's remote monitoring systems, such as Verio, Inc.

55. Dell has infringed and continues to infringe the '416 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card ("DRAC"). Dell has also indirectly infringed and continues to indirectly infringe the '416 Patent by encouraging its customers to implement and practice the claims of the '416 Patent, including Dell's customers who make, use, sell, and/or offer to sell servers implementing Dell's remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

56. Round Rock Research has been and continues to be damaged by Defendants' infringement of the '416 Patent.

57. Dell has willfully infringed and continues to willfully infringe the '416 Patent. Dell has continued its infringement of the '416 Patent despite having received written notice of its infringement from Round Rock Research.

Count IX

Infringement of U.S. Patent No. 6,681,342

58. Paragraphs 1-57 are incorporated by reference as if fully restated herein.

59. Oracle has infringed and continues to infringe the '342 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, Oracle servers implementing a remote monitoring system, such as the Oracle Integrated Lights-Out Manager ("ILOM"). Oracle has also indirectly infringed and continues to indirectly infringe the '342 Patent by encouraging its customers to implement and practice the claims of the '342 Patent, including Oracle's customers who make, use, sell, and/or offer to sell servers implementing Oracle's remote monitoring systems, such as Verio, Inc.

60. Dell has infringed and continues to infringe the '342 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, directly and/or indirectly, by making, using, offering for sale, selling, and/or importing into the United States infringing systems, including, but not limited to, servers implementing a remote monitoring system, such as the Dell Remote Access Card ("DRAC"). Dell has also indirectly infringed and continues to indirectly infringe the '342 Patent by encouraging its customers to implement and practice the claims of the '342 Patent, including Dell's customers who make, use, sell, and/or offer to sell servers implementing Dell's remote monitoring systems, such as VIRTBIZ, Inc., NeoSpire, Inc., Rackspace, Inc., and LayeredTech, Inc.

61. Round Rock Research has been and continues to be damaged by Defendants' infringement of the '342 Patent.

62. Dell has willfully infringed and continues to willfully infringe the '342 Patent. Dell has continued its infringement of the '342 Patent despite having received written notice of its infringement from Round Rock Research.

Prayer For Relief

Wherefore, Plaintiff Round Rock Research respectfully requests that this Court enter judgment against Defendants Oracle Corporation and Dell, Inc. as follows:

- a) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,088,816;
- b) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,145,098;
- c) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,170,067;
- d) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,199,173;
- e) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,243,838;
- f) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,266,721;
- g) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,425,006;
- h) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,553,416;
- i) adjudging that the Defendants have infringed, induced infringement of, and/or contributorily infringed, literally or under the doctrine of equivalents, U.S. Patent No. 6,681,342;
- j) adjudging that Dell's infringement has been willful;
- k) awarding Round Rock Research the damages to which it is entitled under 35 U.S.C. § 284 for Defendants' past infringement and any continuing or future infringement up until the date Defendants are finally and permanently enjoined from further infringement, including both compensatory damages and enhanced/treble damages for willful infringement, and ordering a full accounting of same;
- l) finding that this case is exceptional under 35 U.S.C. § 285;
- m) awarding Round Rock Research pre-judgment and post-judgment interest on its damages; and

n) awarding Round Rock Research such other and further relief in law or equity that the Court deems just and proper.

Demand For Jury Trial

Round Rock Research hereby demands a trial by jury on all claims and issues so triable.

DATED: June 8, 2011

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