

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

2023 SEP 11 PM 3:25

VILOX TECHNOLOGIES, LLC AND)
JOSEPH L. DE BELLIS, an)
individual,)
Plaintiffs,)

Civil Action No. 1:23-cv-00302-MN

v.)

ORACLE CORPORATION,)
Defendant.)

JURY TRIAL DEMANDED

PLAINTIFFS' AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Vilox Technologies, LLC ("Vilox") filed an "Original Complaint" and demand for jury trial in the Western District of Texas, Waco Division, seeking relief from patent infringement of the claims of U.S. Patent No. 6,760,720 ("the '720 patent") and U.S. Patent No. 7,188,100 ("the '100 patent") (referred to as the "Patents-in-Suit") by Oracle Corporation. ("Oracle" or "Defendant"). The Original Complaint was transferred to the District of Delaware. This Amended Complaint is in response to a Motion to Dismiss filed by Oracle and a corresponding July 27, 2023 Oral Hearing.

I. THE PARTIES

1. Plaintiff Vilox Technologies, LLC is a Texas Limited Liability Company with its principal place of business located in Austin, Texas.

2. Plaintiff Joseph L. De Bellis, MD intervened in the case in Delaware. Dr. De Bellis is the assignee and owner of the patents-in-issue.

3. On information and belief, Oracle is a corporation organized under the laws of the State of Delaware having a principal place of business at 2300 Oracle Way, Austin, Texas 78741. On information and belief, Oracle makes, sells, and offers to sell products and services throughout Texas and Delaware, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be

sold in Texas and Delaware including this judicial district. Oracle can be served with process through their registered agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701, or wherever they may be found.

II. JURISDICTION AND VENUE

4. This Court has original subject-matter jurisdiction over the entire action pursuant to 28

U.S.C. §§ 1331 and 1338(a) because Plaintiff's claims arise under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

5. The Original Complaint was filed in Texas and subsequently was transferred to the District of Delaware. Thus, this Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Delaware and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of Delaware and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this judicial district.

6. Because of the transfer, venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because 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 Texas and in this District.

III. INFRINGEMENT - Infringement of the '720 Patent

7. On July 6, 2004, U.S. Patent No. 6,760,720 ("the '720 patent", attached as Exhibit A) entitled "Search-on-the-Fly/Sort-on-the-Fly Search Engine for Searching Databases," was duly and legally issued by the U.S. Patent and Trademark Office. At the time of infringement of the '720 Patent claims, Vilox owned the patent. However, Dr. De Bellis now owns the '720 patent by assignment.

8. The '720 patent relates to a novel and improved method and apparatus for conducting on-the-fly searches providing users with an intuitive mechanism for searching databases, allowing a user to access data in the database without having to know the structure of the database.

9. Oracle made, used, sold, and offered for sale within Texas and within this District and elsewhere in the United States and/or imported into Texas and into this District and elsewhere in the United States, products or services that, among other features, includes receiving a selection of one or more databases, generating a list of data fields that include a descriptor indicating a data category, receiving a search selection for a data field from the list of data fields, determining a quantity of entries in the selected database field, determining if the number of entries in the database field is equal to or less than a specified number of entries or if the number of entries does not exceed the specified amount, and if in excess of the specified amount reducing the number of characters displayed to the user, that infringes one or more of claims 1-39 of the '720 patent, including one or more of those claims, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the '720 patent into service (i.e., used them); but for Defendant's actions, the claimed-invention embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant procured monetary and commercial benefit from it.

10. The Accused Instrumentalities are embodied in Oracle Database products, Oracle

Cloud Infrastructure (“OCI”), and Oracle ATG Platform products and generally relate to retrieval, search, generation of results, and truncation of displayed characters performed within Oracle Database products, OCI products, and Oracle ATG Platform products.

11. Support for the allegations of infringement may be found in the charts attached as Exhibits B - D.

12. **INFRINGEMENT OF CLAIM 1 OF THE '720 PATENT by Oracle Database:** refer to Exhibit B, clearly showing infringement of the '720 Patent, and the following:

13. The preamble of claim 1 recites “A method implemented on a computer for searching databases.” An Oracle Database 2 Day Developers Guide (“Guide”) “Shows how to develop and deploy a simple Oracle Database application.” Guide 1-1. The Guide continues on page 1 - 4: “**Structured Query Language (SQL)** [see following paragraph] (pronounced *sequel*) is the set-based, high level computer language with which all programs and users access data in Oracle Database.” (Emphasis in Guide.) Thus, the Guide makes clear that operations (e.g., searching, using SQL) on data in the Oracle Database is a computer-implemented method. Furthermore, the claim chart of Exhibit B shows an install and upgrade routine to install a database and corresponding database application on a computer.

14. During the July 27, 2023 Oral Hearing before this court, counsel for Oracle stated that “the fundamental problem with the pleadings ... [is that] the claim charts are stitched together using multiple Oracle products that aren’t Oracle database or ATG, number one, and number two they rely upon essentially a software program called SQL ... that’s not an Oracle product.” See Hearing transcript, page 19.

15. This statement from the Oral Hearing is demonstrably FALSE in that the claim charts are not “stitched together,” and that in fact, SQL is an Oracle product, as Oracle’s own publicly-available documents prove. Turning first to the issue of SQL, following is an excerpt

from a document Oracle produced in this litigation in an effort to refute the claim infringement charges. Specifically, on page 5, the Oracle-produced document, Introduction to Oracle Database (provided by link in Document 38-2, Declaration of Diana M. Rutkowski, originally filed in the Western District of Texas), discloses:

Data Access

A general requirement for a DBMS is to adhere to accepted industry standards for a data access language.

Structured Query Language (SQL)

SQL is a set-based declarative language that provides an interface to an RDBMS such as Oracle Database.

Procedural languages such as C describe *how* things should be done. SQL is nonprocedural and describes *what* should be done.

SQL is the ANSI standard language for relational databases. All operations on the data in an Oracle database are performed using SQL statements. For example, you use SQL to create tables and query and modify data in tables.

A SQL statement can be thought of as a very simple, but powerful, computer program or instruction. Users specify the result that they want (for example, the names of employees), not how to derive it. A SQL statement is a string of SQL text such as the following:

```
SELECT first_name, last_name FROM employees;
```

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SQL statements enable you to perform the following tasks:

- Query data
- Insert, update, and delete rows in a table
- Create, replace, alter, and drop objects
- Control access to the database and its objects
- Guarantee database consistency and integrity

SQL unifies the preceding tasks in one consistent language. Oracle SQL is an implementation of the ANSI standard. Oracle SQL supports numerous features that extend beyond standard SQL.

What this excerpt makes clear is that Oracle uses SQL in its database products, contrary to what

Oracle's counsel would have this court believe. Furthermore, Oracle's counsel repeated this false allegation on each of pages 20, 21, 22, 23, and 24 of the transcript. In other words, it appears that Oracle's major justification for dismissal of the Original Complaint under FRCP 12(b)(6) is the allegation that Oracle does not use SQL. That "justification" has NO BASIS in fact, and in the event the justification may have swayed the court, Plaintiff respectfully requests the court deny the Motion to Dismiss under FRCP 12(b)(6).¹

16. The other allegation, that the claim charts are "stitched together" also is false. However, in the Amended Complaint, Dr. De Bellis provides additional clarity as to how the claim limitations can be found in Oracle products, including Oracle Database. In addition, Dr. De Bellis provides additional claim charts from both the '720 Patent and the '100 patent.

17. In addition to addressing the two allegations (discussed above) that were presented to this court during the Oral Hearing, Dr. De Bellis here addresses the issue of if and how Oracle Corporation can directly infringe method claim 1 of the '720 Patent. Specifically, Oracle Corporation discloses:

¹ As a side note, during the July 27, 2023 Oral Hearing, counsel for Vilox Technologies, LLC had an opportunity to point out the absurdity of Oracle's arguments, but failed to do so, instead further muddying the waters with his response to this court's question regarding SQL. See Transcript, pages 28 – 30. Apparently, neither counsel knows that Oracle Database uses SQL. Vilox Technologies, LLC's counsel also could not address this court's question (see Transcript, page 30) regarding Oracle practicing the method of claim 1 of the '720 and '100 Patents. See Transcript, pages 30 – 34. One simple observation is that Oracle sold the software that enabled the method. Accordingly, included with this Amended Complaint are claim charts for apparatus claims of both the '720 and '100 Patents. However, as alleged herein, Oracle does directly infringe the method claims because Oracle operates a cloud computing service (i.e., "software as a service"), specifically Oracle Cloud Infrastructure ("OCI"), and on information and belief, that cloud computing service, OCI, involves Oracle Corporation executing a "method." That is, on information and belief, OCI operates on Oracle servers, and thus Oracle executes the method. See paragraph 17 of this Amended Complaint.

- **Plugging In to the Cloud**

Oracle Database 12c, released in 2013, was designed for the Cloud, featuring a new Multitenant architecture, In-Memory column store, and support for JSON documents. Oracle Database 12c helped DBAs make more efficient use of their IT resources, while continuing to reduce costs and improve service levels for end users.

Introduction to Oracle Database, page 3. This disclosure appears to relate to Oracle's software as a service product; that is, Oracle Database hosted on an Oracle cloud server. On Information and belief, Dr. De Bellis asserts that, with discovery, he will be able to show direct infringement of the method claims, including claim 1 of the '720 Patent, by Oracle, because it is Oracle's server that is executing the methods enabled through Oracle Database using Oracle's "Oracle Cloud Infrastructure." See footnote 1.

18. Continuing with the '720 Patent, claim 1, the first limitation is "determining a database schema for a database, wherein the database includes database fields." This limitation is met by Oracle Database. For example, the Guide describes schemas composed of schema objects. A schema object may be, for example, a table or an index. Page 2 – 7 of the Guide discloses "determining a database schema;" in this example, the schema objects are indexes. Specifically, page 2 – 7 discloses the following determined schema, including schema "OBJECT_NAME" and schema "OBJECT_TYPE" for an example Oracle Database for human resources (HR):

Example 2-2 Viewing HR Schema Objects with SQL*Plus

```
COLUMN OBJECT_NAME FORMAT A25
COLUMN OBJECT_TYPE FORMAT A25
```

```
SELECT OBJECT_NAME, OBJECT_TYPE FROM USER_OBJECTS
ORDER BY OBJECT_TYPE, OBJECT_NAME;
```

Result is similar to:

OBJECT_NAME	OBJECT_TYPE
COUNTRY_C_ID_PK	INDEX
DEPT_ID_PK	INDEX
DEPT_LOCATION_IX	INDEX
EMP_DEPARTMENT_IX	INDEX
EMP_EMAIL_UK	INDEX
EMP_EMP_ID_PK	INDEX
EMP_JOB_IX	INDEX
EMP_MANAGER_IX	INDEX

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The wherein clause of the first limitation is met by simple reference to the above excerpt from the Guide. For example, one database field is “Country_C_ID_PK.” Also see Exhibit B, page 4, describing that an Oracle Database comprises a “logical structure called a schema.” In addition, as discussed in paragraph 19 below, for table schema objects, the table columns are named database fields.

19. The second limitation of claim 1 is “providing a list of the database fields, wherein the list includes a descriptor indicating a data category.” The above excerpt of page 2 – 7 of the Guide shows a list of the database fields in the left-hand column, and each database field includes a name (e.g., “Country_C_ID_PK”) of the database field; that is, “Country_C_ID_PK” is the descriptor.

20. Another example is provided in “Introduction to Oracle Database” (as noted above, kindly produced by Oracle in response to the Original Complaint), page 4:

Tables

A table describes an entity such as employees.

You define a table with a table name, such as employees, and set of columns. In general, you give each column a name, a data type, and a width when you create the table.

A table is a set of rows. A column identifies an attribute of the entity described by the table, whereas a row identifies an instance of the entity. For example, attributes of the employees entity correspond to columns for employee ID and last name. A row identifies a specific employee.

You can optionally specify a rule, called an integrity constraint, for a column. One example is a NOT NULL integrity constraint. This constraint forces the column to contain a value in every row.

As can be seen from the Oracle-produced document, one schema object, namely a table, consists of a set of rows and columns, with a column identifying an attribute of an entity described in the table. Thus, the columns correspond to database fields and the column has a name that identifies the attribute. Accordingly, the Oracle-supplied document further supports the assertions of infringement for claim 1 of the '720 Patent.

21. The third limitation of claim 1 is “receiving a search selection for a database field on the provided list of database fields.” The Guide discloses: A **query**, or SQL SELECT statement, selects data from one or more tables or views.” Guide, page 2 – 12 (emphasis in Guide).

22. The fourth limitation of claim 1 is “determining a quantity of entries in the selected database field.” The following excerpt from the Guide shows a function for determining (counting) the number of rows in selected database field. The Guide describes a “Group”

Example 2-22 Counting the Number of Rows in Each Group

```

SELECT MANAGER_ID "Manager",
COUNT(*) "Number of Reports"
FROM EMPLOYEES
GROUP BY MANAGER_ID
ORDER BY MANAGER_ID;

```

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As the Guide further explains:

An aggregate function takes a group of rows and returns a single result row. The group of rows can be an entire table or view. The aggregate functions that SQL supports are listed and described in *Oracle Database SQL Language Reference*. Aggregate functions are especially powerful when used with the GROUP BY clause, which groups query results by one or more columns, with a result for each group. The query in Example 2-22 uses the COUNT function and the GROUP BY clause to show how many people report to each manager. The wildcard character, *, represents an entire record. Guide, page 2-29.

23. The fifth limitation of claim 1 is “if the quantity exceed a specified amount, truncating data, and displaying the truncated data wherein the truncating reduces characters in one or more entries in the selected database field and the truncated data represents each of the entries in the selected database field” The following excerpt from the Guide shows an example of determining a number of entries (in the example, six entries) and truncating each of the entries by reducing characters in one or more of the six entries and the truncated data represents each of the six entries:

Chen	269.59
Faviet	295.89
Greenberg	394.52
Popp	226.85
Sciarra	253.15
Urman	256.44

6 rows selected.

Example 2-15 Truncating Numeric Data

```
SELECT LAST_NAME,
TRUNC ((SALARY * 12)/365) "Daily Pay"
FROM EMPLOYEES
WHERE DEPARTMENT_ID = 100
ORDER BY LAST_NAME;
```

Result:

LAST_NAME	Daily Pay
Chen	269
Faviet	295
Greenberg	394
Popp	226
Sciarra	253
Urman	256

6 rows selected.

24. The sixth and final limitation of claim 1 recites “if the quantity does not exceed the specified amount, displaying contents of the database field.” On information and belief, this limitation of claim 1 as shown in EXHIBIT B, page 13, is met by Oracle Database.

25. **INFRINGEMENT OF CLAIM 39 OF THE '720 PATENT** by Oracle Database: refer to Exhibit C, clearly showing infringement of the '720 Patent, and the following:

26. The Preamble of claim 39 recites a “search engine program,” and thus claim 39 is an apparatus claim that is infringed by Oracle’s actions related to making, selling, and offering for sale the oracle Database products. Additionally, on information and belief, the search engine program is infringed by use of Oracle Database as a component of Oracle Cloud Infrastructure (OCI). See paragraph 17 above and footnote 1.

27. The first limitation of claim 39 is a request analyzer that receives a search request. Oracle Database uses the terms “query” and a “SELECT statement” as the equivalent of the

claimed search request.

28. The second limitation of claim 39 is a status control that includes information related to the one or more search cycles. This limitation is met by Oracle's incorporation of SQL statements as described in Oracle Database 2 Day Developers Guide ("Guide").

29. The third limitation of claim 39 is a database qualifier that controls access to a database and obtains data field information. The Guide, 2-17, meets this third limitation.

30. The fourth limitation of claim 39 is a query generator that formats the received search request. The Guide, 2-17 to 2-27 illustrates query formatting that meets this fourth limitation.

31. The fifth limitation of claim 39 is a database driver that returns data from the one or more databases. The Guide, 8-4 discloses an Execute Immediate function that meets this fifth limitation.

32. The sixth and final limitation of claim 39 is a truncator that determines a size of a data field, compares the size to a specified limit, and reformats the search request to return data with characters reduced in one or more entries. On information and belief, Oracle Database enables this function. In addition, Guide, starting at 8-18 describes several adaptive search functions. One such function is:

Iterative Processing: Arrays

Array processing is identical to row-by-row processing, except that it processes a group of rows in each iteration rather than a single row.

Assume that your functional requirement is the same as in Example X-X: query an external table named `ext_scan_events`, and then insert its rows into a heap-organized staging table named `stage1_scan_events`. The following PL/SQL block uses an array technique to meet this requirement:

```
declare
  cursor c is select s.* from ext_scan_events s;
  type t is table of c%rowtype index by binary_integer;
  a t;
  rows binary_integer := 0;
begin
  open c;
  loop
    fetch c bulk collect into a limit array_size;
    exit when a.count = 0;
    forall i in 1..a.count
      insert into stage1_scan_events d values a(i);
    commit;
  end loop;
  close c;
end;
```

33. **INFRINGEMENT OF CLAIM 1 OF THE '720 PATENT** by Oracle ATG: refer to Exhibit D, clearly showing infringement of the '720 Patent, claim 1.

34. For claims 1 and 39, the allegations of infringement are preliminary and are therefore subject to change.

35. Defendant's infringing actions are without license and authorization.

36. Defendant induced infringement from at least March 2017. Defendant actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies) as to make, sell, and use its products and services (e.g., via Oracle Database products, and Oracle ATG Platform products, and OCI, implementing a method to retrieve, and search records, generate results, and display results) and related products and services such as to cause infringement of one or more of claims 1-39 of the '720 patent, literally or under the doctrine of equivalents. Defendant

encouraged and instructed others on how to use the products showing specific intent. Moreover, Defendant has known of the '720 patent and the technology underlying it since at least March 2017. For clarity, direct infringement is alleged in this complaint.

37. Defendant contributorily infringed the claims of the '720 Patent from at least March 2017. Defendant has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., via Oracle Database products, and Oracle ATG Platform products, and OCI products implementing a method to retrieve, and search records, generate results, and display results) and to sell and use related products and services such as to cause infringement of one or more of claims of the '720 Patent, literally or under the doctrine of equivalents. Defendant, from at least March 2017, encouraged and instructed others on how to use the products showing specific intent. Further, there are no substantial noninfringing uses for Defendant's products and services. For clarity, direct infringement is previously alleged in this complaint.

38. Defendant has caused Dr. De Bellis damage by direct and indirect infringement of (including inducing infringement of) the claims of the '720 patent.

IV. INFRINGEMENT OF THE '100 PATENT

39. On March 6, 2007, U.S. Patent No. 7,188,100 ("the '100 patent," attached as Exhibit D) entitled "Search-on-the-Fly Report Generator," was duly and legally issued by the U.S. Patent and Trademark Office. At the time of infringement alleged in this Amended Complaint, Vilox owned the '100 Patent by assignment. Dr. De Bellis now owns the '100 Patent.

40. The '100 Patent relates to a novel and improved method and apparatus for taking the results of a search using a search-on-the-fly search engine (or other search engine), generating a search result that includes descriptors of data categories, and creating a template that includes a

link or path to one or more fields in one or more databases.

41. Oracle made, used, sold and/or offered for sale within Texas and within this District and elsewhere in the United States and/or imported into Texas and this District and elsewhere in the United States, products or services that, among other features, includes receiving a database query, searching a database on-the-fly based on the query using a search-on-the-fly search engine (or other search engine), tweaking the received query to generate a defined query of the database, accessing the database using the defined query, generating a search result that includes descriptors of data categories, and creating a template that includes a link or path to one or more fields in one or more databases, that infringes one or more of claims 1-38 of the '100 Patent, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the '100 Patent into service (i.e., used them); but for Defendant's actions, the claimed-invention embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant's procurement of monetary and commercial benefit from it.

42. The Accused Instrumentalities are embodied in Oracle Database products, Oracle ATG Platform products, and OCI, and generally relate to retrieval, search, generation of results, and truncation of displayed characters performed within Oracle Database products, Oracle ATG Platform products, and OCI.

43. Support for the allegations of infringement may be found in the claim charts attached as Exhibits F - H and the following paragraphs 44 – 46.

44. Method claim 1 (see Exhibit F) and apparatus claim 32 (see Exhibit G) each recite a "query tweaker." The specification of the '100 Patent discloses that the query tweaker receives a raw query and performs "special transformations and corrections, including JOIN operations based on the database schema, applying filters and plug-ins, and applying GROUP BY clauses."

Oracle Database discloses Oracle Database includes “JOINS, filter, Plug-in, and GROUP By clause” to performing transformations and corrections on the received query.

45. Method claim 1 (see Exhibit F) and apparatus claim 32 (see Exhibit G) each recite a report template. Oracle discloses use of report templates. Oracle discloses a wide variety of report templates; for example, Oracle discloses named column templates

Named column templates allow for more flexibility in report design. However, because they reference columns by name, they can only be used by reports that are based on those columns. For example:

Copy

```
<tr><td>#ENAME#</td><td>#SAL#</td></tr>
```

Although named column templates offer flexibility, you may need to create a new template for each query. You can also include a position notation. The following example demonstrates how to use following HTML and substitution strings:

```
<tr><td>#ENAME#</td><td>#SAL#</td></tr>
```

```
<tr><td>#1#</td><td>#2#</td></tr>
```

On information and belief, pending discovery, Plaintiff alleges one or more Oracle report template features meet the limitations of claims 1 and 32 with respect to “report templates.”

46. Referring to Exhibit G, Oracle Database employs templates and views. On information and belief, the oracle Database templates and views meet the requirements of limitations 2 and 5 of apparatus claim 32 of the '100 Patent.

47. These allegations of infringement are preliminary and are therefore subject to change.

48. Defendant's infringing actions are without license and authorization.

49. Defendant has and continues to induce infringement from at least March 2017. Defendant actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies) on how to use its products and services (e.g., utilizing search features and report

features embodied in Defendant's products or services) and related products and services such as to cause infringement of one or more of claims 1-38 of the '100 Patent, literally or under the doctrine of equivalents. Defendant, from at least March 2017, encouraged and instructed others on how to use the products showing specific intent. Moreover, Defendant knew of the '100 Patent and the technology underlying it from at least March 2017. For clarity, direct infringement is alleged in this complaint.

50. Defendant contributorily infringed from at least March 2017. Defendant actively encouraged or instructed others on how to use its products and services (e.g., utilizing search features and report features embodied in Defendant's products or services) and related products and services such as to cause infringement of one or more of claims of the '100 Patent, literally or under the doctrine of equivalents. Defendant, from at least March 2017, encouraged and instructed others on how to use the products showing specific intent. Further, there are no substantial noninfringing uses for Defendant's products and services. Moreover, Defendant has known of the '100 Patent from at least March 2017.⁴ For clarity, direct infringement is alleged in this complaint.

51. Defendant has caused and will continue to cause Vilox damage by direct and indirect infringement of (including inducing infringement of) the claims of the '100 patent.

V. JURY DEMAND

Dr. De Bellis hereby requests a trial by jury on issues so triable by right.

VI. PRAYER FOR RELIEF

WHEREFORE, Dr. De Bellis prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '720 patent and the '100 patent through selling, offering for sale, manufacturing, and inducing others to infringe by using and instructing to implement a method to retrieve, and search records using a search-on-the-fly search engine (or other search engine), generating a search result that includes descriptors of data categories, and creating a template that includes a link or path to one or more filed in one or more databases;
- b. award Dr. De Bellis damages in an amount sufficient to compensate it for Defendant's infringement of the Patents-in-Suit in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;
- c. award Dr. De Bellis an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award ViloX its attorneys' fees, expenses, and costs incurred in this action;
- e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284; and
- f. award Dr. De Bellis such other and further relief as this Court deems just and proper.

Dated: September 11, 2023

Joseph L. De Bellis MD

By: Isl Joseph L. De Bellis

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I, Joseph L. De Bellis, hereby certify that on September 11, 2023, the attached document was hand delivered to the Clerk of the Court.

I further certify that on September 11, 2023, I electronically mailed the document to the following:

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