

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

PROTEGRITY CORPORATION)	
a Cayman Islands Company, and)	
PROTEGRITY USA, INC.,)	
a Delaware Corporation,)	
Plaintiffs,)	
)	
v.)	
)	
GAZZANG, INC.)	
a Texas Corporation)	
)	
Defendant.)	

Civil Action No.: 3:14-cv-00825

FIRST AMENDED COMPLAINT AND JURY TRIAL DEMAND

Plaintiffs, PROTEGRITY CORPORATION and PROTEGRITY USA, INC., by and through their undersigned attorneys, allege, upon information and belief, as follows:

THE PARTIES

1. Plaintiff, Protegrity Corporation, is a corporation incorporated under the laws of the country of The Cayman Islands. Plaintiff, Protegrity USA, Inc., is Protegrity Corporation's principal operating subsidiary in the United States. Protegrity USA, Inc. is a Delaware Corporation, having its principal place of business at 5 High Ridge Park, Stamford, Connecticut 06905. Plaintiffs will hereinafter be collectively referred to as "Protegrity."

2. Upon information and belief, Defendant, Gazzang, Inc. is a Texas Corporation, having its principal place of business in Texas and having an office at 600 Congress Avenue, Suite 1650, Austin, TX 78701. Upon information and belief, Gazzang, Inc has been acquired by Cloudera, Inc., believed to be a Delaware Corporation with an address at 1001 Page Mill Road,

Building 2, Palo Alto, California, 94304.

3. This action has arisen under the patent laws of the United States, Title 35 United States Code, Section 271 *et seq.*

4. Jurisdiction of this action arises under 28 U.S.C. §1338(a). Venue is predicated under 28 U.S.C. §§ 1391(c) and 1400(b).

BACKGROUND

5. Gazzang offers to sell zTrustee (“Defendant’s Database Security Product”).

6. Defendant’s Database Security Product is a method for detecting intrusion detection in a database.

7. Defendant’s Database Security Product is a secure vault for storing any data object that must be policy controlled.

8. Defendant’s Database Security Product enforces policies for governing access to data stored within its secure vault. On information and belief, these policies include deposit retrieval limits.

9. Protegrity notifies the public and related industries of its patent portfolio by, among other things, publishing such information on its website.

10. Defendant and Protegrity compete for the same customers.

COUNT I

11. On December 4, 2007, United States Patent Number 7,305,707 (hereinafter “’707 Patent”) entitled “Method for Intrusion in a Database System” was duly and regularly issued. A copy of the ‘707 Patent is attached hereto as Exhibit “A”.

12. Protegrity Corporation is the owner of the ‘707 Patent. Protegrity Corporation has the right to sue for patent infringement. Aside from covenants not to sue granted in

unrelated litigation, Protegrity USA, Inc. is an exclusive licensee to the '707 Patent.

13. Upon information and belief, Defendant has directly infringed the claims of '707 Patent by having made, used or sold Defendant's Database Security Product, which duly embodies the invention as claimed therein; the infringement by Defendant of the '707 Patent has deprived Protegrity of sales which it otherwise would have made and has in other respects injured Protegrity and will cause Protegrity added injury and loss of profits unless enjoined by this Court.

14. Upon information and belief, Defendant has directly infringed the claims of the '707 Patent by having made, used, offered for sale, or sold Defendant's Database Security Product.

15. Upon information and belief, Defendant has been aware of the '707 Patent since at least its issue date.

16. Plaintiffs have been damaged by the acts of infringement complained of herein.

17. Plaintiffs have no adequate remedy without the intervention of this Court.

18. This case is "exceptional" within the meaning of 35 USC § 285.

WHEREFORE, Plaintiffs pray that:

A. An injunction be granted preliminarily and permanently restraining Defendant and all those in privity with it from further infringement of Plaintiffs' '707 Patent.

B. Defendant be required to account to Plaintiffs for the damages recoverable by Plaintiffs under 35 U.S.C. §284 as a result of the wrongful making, using, and selling of Plaintiffs' inventions as claimed in Plaintiffs' '707 Patent, the exact extent of which cannot now be determined by Plaintiffs, and that all of such damages be trebled.

C. Plaintiffs be awarded reasonable attorney fees;

- D. Plaintiffs be allowed its costs; and
- E. Such other and further relief be granted to which Plaintiffs may be justly entitled.

JURY DEMAND

Plaintiffs demand a trial by jury.

September 9, 2014

Respectfully submitted,

/s/ Woodrow H. Pollack

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 9, 2014, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Woodrow H. Pollack

Woodrow H. Pollack