

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

SAMSCLOUD, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. _____
	)	
RAPTOR TECHNOLOGIES, LLC,	)	JURY TRIAL DEMANDED
	)	
Defendant.	)	

PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Samscloud, LLC (“Samscloud” or “Plaintiff”) files this Complaint against Defendant Raptor Technologies, LLC (“Raptor” or “Defendant”) for infringement of U.S. Patent Nos. 11,468,757 (the “’757 patent”) and 12,154,421 (the “’421 patent”).

THE PARTIES

1. Plaintiff Samscloud is a Texas LLC founded in 2017 with an address at 11131 Carriage Lake, Houston, TX, 77065.
2. On information and belief, Defendant Raptor Technologies, LLC is a limited liability company organized under the laws of the State of Delaware, with its principal place of business located at 2900 North Loop W, Suite 900, Houston, TX 77092. Raptor may be served with process via its registered agents and via its corporate officers.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others.
4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. On information and belief, Raptor is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long Arm Statute, due at least to its substantial business in this State and judicial district, including: (A) at least part of its infringing activities alleged herein which purposefully avail the Defendant of the privilege of conducting those activities in this state and this judicial district and, thus, submits itself to the jurisdiction of this Court; and (B) regularly doing or soliciting business, engaging in other persistent conduct targeting residents of the State of Delaware and this judicial district, and/or deriving substantial revenue from infringing goods offered for sale, sold, and imported and services provided to and targeting Delaware residents and residents of this judicial district vicariously through and/or in concert with its alter egos, intermediaries, agents, distributors, importers, customers, subsidiaries, and/or consumers. For example, the Delaware Department of Education has purchased Raptor's products and/or services for Delaware school districts each year since 2017. *See Open Expenditures – Raptor Technologies LLC*, STATE OF DELAWARE, <https://opencheckbook.delaware.gov/#!/year/2025/explore/0/vendor/RAPTOR+TECHNOLOGIES+LLC/0-/department> (last visited July 15, 2026).

6. Defendant also maintains commercial websites accessible to residents of the State of Delaware and this judicial District, through which Defendant promotes and facilitates sales of the infringing products. For example, Raptor's website raptortech.com is accessible to consumers in the United States, including those in the State of Delaware and this judicial District. Raptor not only supplies information about the Infringing Products at this site, but also educates consumers on pursuing state funds, including in Delaware, in order to facilitate purchasing the Infringing Products. *See Maximize School Safety Funding to Protect Your School*, RAPTOR TECHNOLOGIES, <https://raptortech.com/school-safety-grants-and-federal-funding/> (last visited July 15, 2026).

7. Thus, Defendant has established minimum contacts with the State of Delaware and the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice.

8. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c) and 1400(b). Defendant is organized under the laws of the State of Delaware and has committed acts of infringement in this district. Accordingly, Raptor may be sued in this district under 28 U.S.C. § 1400(b).

THE ASSERTED PATENTS AND TECHNOLOGY

9. Gary Baker is the sole inventor of the Asserted Patents: the '757 Patent and the '421 Patent, both titled "Systems and methods for facilitating supervision of individuals based on geofencing." The Asserted Patents both share a priority date at least as early as March 5, 2019. The '421 Patent is a continuation-in-part of the '757 Patent.

10. Mr. Baker is the CEO, founder, chairman, and managing member of Samscloud. Samscloud sells products and services covered by the Asserted Patents, which Samscloud advertises via its website samscloud.io.

11. The Asserted Patents are directed toward systems and methods for creating a grid-based geofence and supervising individuals within the geofenced area. The systems and methods utilize a combination of various types of devices to generate the geofence as seen, for example, in the Abstract for the '757 Patent:

Accordingly, the method may include receiving, using a communication device, a parameter from a supervisor device associated with a supervisor and a geographical location from the supervisor device. Further, the method may include analyzing, using a processing device, the geographical location based on a security parameter and generating a geofence corresponding to a geographical area based on the analyzing. Further, the method may include receiving, using the communication device, supervisee data associated with a supervisee from a supervisee device. Further, the method may include analyzing, using the processing device, the supervisee data based on the geofence and generating a supervision notification based on the analyzing of the supervisee data. Further, the method may include

transmitting, using the communication device, the supervision notification to the supervisor device.

12. The Asserted Patents describe supervision systems and methods that involve creating a geofence comprising a grid in which each grid box is also geofenced, tracking the location of individuals within the geofence and the grid boxes, and implementing various supervision and alert features to protect supervisees within the geofenced area. The Asserted Patents describe a claimed combination of dedicated elements and processes that were not, at the time of invention, well-understood, routine, or conventional.

13. An exemplary embodiment is shown in Figure 42 of each of the Asserted Patents:

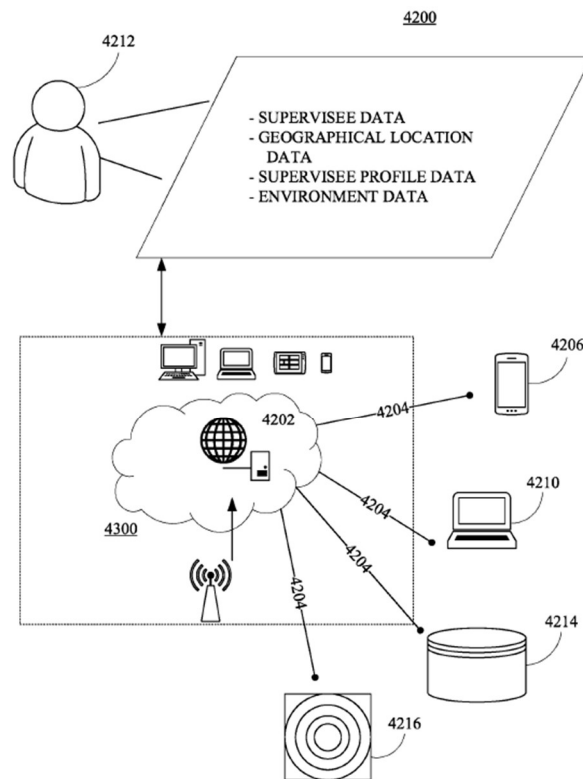


FIG. 42

14. Defendant makes, uses, sells, has sold, and/or offers for sale in the United States products (“Infringing Products”) that are not made or licensed by Samscloud and that infringe the Asserted Patents.

15. Defendant markets its Infringing Products specifically extolling the functionality of the Asserted Patents. As one example, Raptor advertises that its Emergency Management Software suite of products allows schools to “know exactly where students, staff, and visitors are—and their status—during emergencies.” *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES, <https://raptortech.com/protect-your-school/raptor-emergency-management-system/> (archived Aug. 4, 2025). Further, Raptor advertises that it uses “Collaborative Response Graphics” provided by Critical Response Group (“CRG”) in the Emergency Management Software products; CRG’s graphics provide building blueprints and grid-based maps to be used with geofencing to supervise individuals. *See id.*; *Collaborative Response Graphics*®, CRG, <https://www.crgplans.com/collaborative-response-graphics/> (last visited July 15, 2026). Raptor incorporates CRG’s gridded reference system, which subdivides mapped facilities into identifiable grid regions used for emergency response, accountability, and location tracking to provide supervision via grid-based geofencing, as seen in product features such as “Critical Incident Mapping.” *See id.*

16. On information and belief, all of Raptor’s Emergency Management Software suite of products that are made, sold, offered for sale, or used in the United States within the statutory period are Infringing Products, including but not limited to Raptor Emergency Management, Raptor Alert, Raptor Team Assist, Raptor Connect, Raptor Accountability, and Raptor Reunification Software. The product names listed in this complaint are exemplary and not exhaustive.

COUNT I

(Infringement of the ’757 Patent)

17. Plaintiff incorporates and re-alleges the allegations contained in paragraphs 1 through 16 herein by reference.

18. The '757 Patent entitled "Systems and methods for facilitating supervision of individuals based on geofencing" was duly and legally issued by the U.S. Patent and Trademark Office on October 11, 2022, from Application No. 16/810,703, published at US2020/0286355 on September 10, 2020, claiming priority to provisional application 62/814,097 filed on March 5, 2019. A true and accurate copy of the '757 Patent is attached hereto as Exhibit A.

19. Each and every claim of the '757 Patent is valid and enforceable, and each enjoys a statutory presumption of validity under 35 U.S.C. § 282.

20. Samscloud exclusively owns all rights, title, and interest in and to the '757 Patent and possesses the exclusive right of recovery, including the exclusive right to recover for past, present, and future infringement.

21. Claim 1 of the '757 Patent recites:

A method for facilitating supervision of individuals based on geofencing, the method comprising:
receiving, using a communication device, at least one security parameter from at least one supervisor device associated with at least one supervisor;
receiving, using the communication device, a geographical location from the at least one supervisor device;
analyzing, using a processing device, the geographical location based on the at least one security parameter;
generating, using the processing device, a geofence corresponding to a geographical area based on the analyzing;
receiving, using the communication device, at least one supervisee data associated with a supervisee from at least one supervisee device;
analyzing, using the processing device, the at least one supervisee data based on the geofence;
generating, using the processing device, a supervision notification based on the analyzing of the at least one supervisee data;
transmitting, using the communication device, the supervision notification to the at least one supervisor device; and
storing, using a storage device, the at least one supervisee data and the supervision notification, wherein:
the geofence is characterized by a geofence area corresponding to the geographical area, wherein the geofence comprises a plurality of geofence grid boxes associated with the geofence area, wherein each geofence grid

box is characterized by a grid box geofence area of the geofence area, wherein the method comprises:

receiving, using the communication device, at least one grid parameter from the at least one supervisor device, wherein the processing device is further configured for:

analyzing, using the processing device, the at least one grid parameter;

determining, using the processing device, the grid box geofence area based on the analyzing of the at least one grid parameter; and

generating, using the processing device, a number of geofence grid boxes based on the determining.

22. Each Infringing Product is configured to perform a method for facilitating supervision of individuals. For example, Raptor's Emergency Management Software enables schools to supervise individuals by tracking the location and status of students and staff:

EMERGENCY MANAGEMENT SOFTWARE SUITE

PREPARE

RESPOND

RECOVER

TRAINING & SUCCESS

DRILL MANAGER

RAPTOR ALERT

ACCOUNTABILITY

REUNIFICATION

RAPTOR TECHNOLOGIES

OVERVIEW & BENEFITS

Be Ready for Any Emergency

Effectively manage drills, instantly notify first responders, accurately account for individuals and safely reunify families

Customize Raptor to your emergency protocols to ensure everyone stays aligned

Access Raptor wherever you are from any web-enabled device

Integrates directly with 911 and provides enriched data to first responders

Get the right help for small incidents and school-wide emergencies from anywhere on campus

New users confidently configure device settings by completing a guided welcome tour

Know exactly where students, staff, and visitors are—and their status—during emergencies

Reunite students with approved guardians up to 4 times faster than paper and pencil

Automatically sync with your student information system

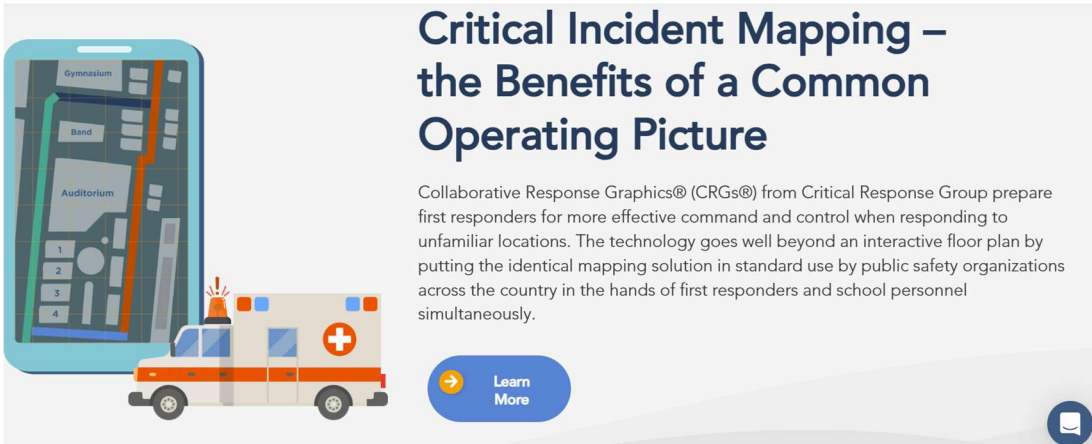
100% aligned with and licensed by The "I Love U Guys" Foundation® protocols

Comply with state mandates like Alyssa's Law

Intuitive, simple interface makes Raptor easy to use even in the most stressful situations

Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES, <https://raptortech.com/protect-your-school/raptor-emergency-management-system/> (archived Aug. 4, 2025).

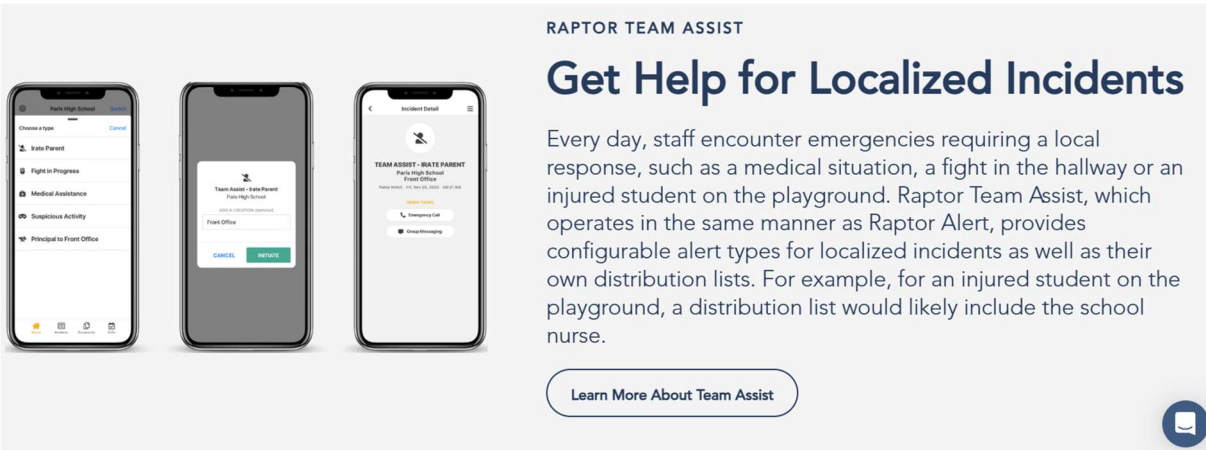
23. Further, on information and belief, the methods performed by the Infringing Products are based on geofencing. For example, the Infringing Products utilize an “interactive floor plan” and map based on the geographical limitations of the school in which the products are employed. The Infringing Products also enable security reports based on location within a geofenced area and security measures deployed to specific locations:



Critical Incident Mapping – the Benefits of a Common Operating Picture

Collaborative Response Graphics® (CRGs®) from Critical Response Group prepare first responders for more effective command and control when responding to unfamiliar locations. The technology goes well beyond an interactive floor plan by putting the identical mapping solution in standard use by public safety organizations across the country in the hands of first responders and school personnel simultaneously.

[Learn More](#)



RAPTOR TEAM ASSIST

Get Help for Localized Incidents

Every day, staff encounter emergencies requiring a local response, such as a medical situation, a fight in the hallway or an injured student on the playground. Raptor Team Assist, which operates in the same manner as Raptor Alert, provides configurable alert types for localized incidents as well as their own distribution lists. For example, for an injured student on the playground, a distribution list would likely include the school nurse.

[Learn More About Team Assist](#)

Account for the Location and Status of Everyone

[Learn More About Raptor Accountability](#)



Account for Everyone

Teachers and staff confirm the status and location of themselves, students, and—if using Raptor Visitor Management—visitors on campus."



Stay Updated in Real-Time

Know the precise location and status of each student, staff member, and visitor in real time.



Assist Injured Persons Faster

Enable first responders to know where they're needed most by giving them access to the details, medical conditions, and locations for all individuals.

Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

24. On information and belief, each Infringing Product is configured to receive security parameters from supervisor devices. For example, supervisors can “customize Raptor to [their] emergency protocols;” those protocols include security parameters such as designated safe areas, emergency rules, drill configurations accountability settings, and alert configurations. Supervisors send those security parameters to Raptor’s cloud-based platform, which comprises a communication device:

 Customize Raptor to your emergency protocols to ensure everyone stays aligned	 Know exactly where students, staff, and visitors are—and their status—during emergencies
 Access Raptor wherever you are from any web-enabled device	 Reunite students with approved guardians up to 4 times faster than paper and pencil
 Integrates directly with 911 and provides enriched data to first responders	 Automatically sync with your student information system
 Get the right help for small incidents and school-wide emergencies from anywhere on campus	 100% aligned with and licensed by The “I Love U Guys” Foundation® protocols
 New users confidently configure device settings by completing a guided welcome tour	 Comply with state mandates like Alyssa’s Law
	 Intuitive, simple interface makes Raptor easy to use even in the most stressful situations

Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

25. On information and belief, each Infringing Product is also configured to receive geographical locations from supervisor devices. For example, school administrators can upload school maps and floorplans (*i.e.*, geographical locations) to be used in emergency situations:

2. Well-defined roles and responsibilities

Eliminate confusion by making sure everyone knows what their role is during an emergency. It's best practice to designate a responsible staff member or group of individuals as your Severe Weather Coordinator(s).

Your coordinator(s) should attend local weather training and be responsible for creating your plan and determining when to activate your response. Staff Compliance Training powered by PublicSchoolWORKS (PSW) is the ideal choice for K12 schools aiming to prioritize staff safety and compliance. This robust online staff training system automates every school employee training scenario, ensuring a seamless and efficient compliance process. Severe weather course options include:

- Tornado Preparedness
- Tornado Safety
- Earthquake Preparedness
- Emergency Procedures
- Hurricane Preparedness
- Severe Weather – Occupant Safety

Further, the district's PSW Safety Advisor can also add individual school site evacuation maps to the courses.

Tip:

With the EmployeeSafe Suite powered by PublicSchoolWORKS, schools have the option to upload district or school evacuation plans/emergency procedures so that staff can easily access them digitally.

Schools can also upload any PDF into Raptor Alert, such as school maps, building floorplans, and Emergency Operations Plan (EOP). Users can access this information from wherever they are 24/7.

Source: *5 Ways to Improve School Safety During Severe Weather*, RAPTOR, <https://raptortech.com/resources/blog/5-ways-to-improve-school-safety-during-severe-weather/> (Mar. 24, 2025).

26. As another example, Raptor has partnered with Critical Response Group (“CRG”) to utilize CRG’s Collaborative Response Graphics and provide “detailed visual communication tools through the Raptor platform” including “GeoRelevant integrated floor plans” and geospatial data (*i.e.*, geographical locations) to establish a “gridded reference system” for use with the emergency features:



Enhance Emergency Management with CRG's Visual Communication Tools on the Raptor Platform



Get Started

How it Works

When integrated with Raptor, Critical Response Group (CRG) enhances emergency management by providing first responders with detailed visual communication tools through the Raptor platform.

When an emergency or Team Assist is initiated in Raptor Alert, the CRG system overlays floor plans, aerial imagery, and geospatial data on the Raptor dashboard. This integration ensures that first responders have immediate access to critical visual information, improving situational awareness and enabling swift, coordinated responses to emergencies.

Source: *Critical Response Group - CRG*, RAPTOR TECHNOLOGIES, <https://raptortech.com/about-us/critical-response-group-crg/> (last visited July 15, 2026).



LAYER BREAKDOWN

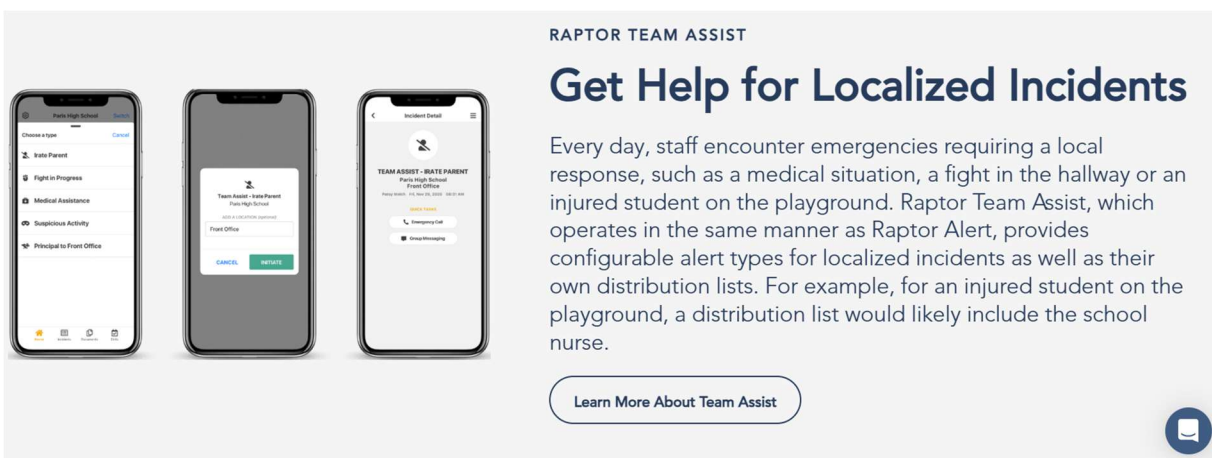
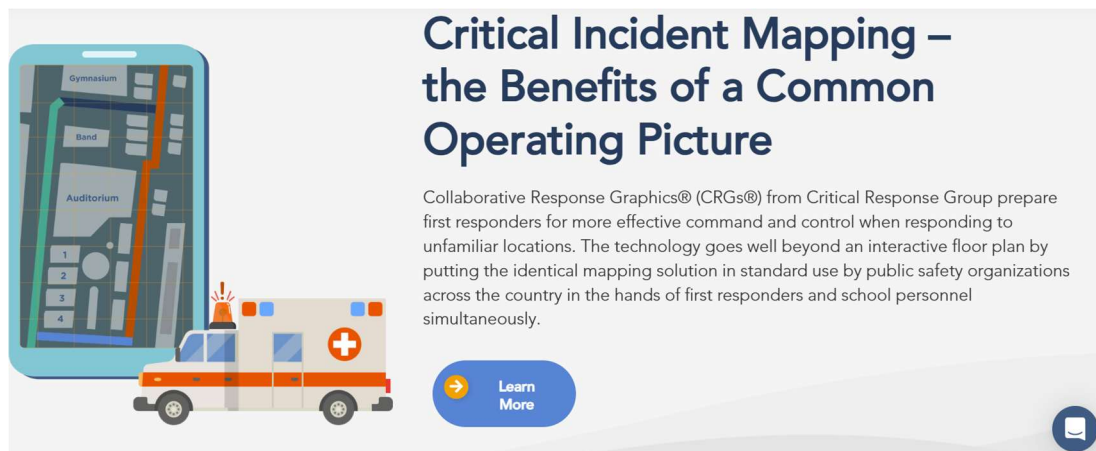
Creating a Unified Map, Inside and Out

CRGs combine a gridded reference system, high-resolution imagery, floor plans, and critical features within a building and surrounding exterior areas to create a communication tool that is usable in a crisis and accessible by first responders through any smart device.

- 1 Grid & Template
- 2 Key Landmarks & Critical Features (AED, Gas, etc)
- 3 Site Specific Labels and Nomenclature
- 4 Highlighted Hallways, Stairwells, Doors, Exits
- 5 GeoRelevant Integrated Floorplans
- 6 Best Available Aerial Imagery

Source: *Collaborative Response Graphics*®, CRG, <https://www.crgplans.com/collaborative-response-graphics/> (last visited July 15, 2025).

27. On information and belief, each Infringing Product is configured to analyze the geographical location based on the security parameters. For example, the Infringing Products determine designated safe zones, emergency assembly areas, and reunification locations; determining where these locations are and how safe they are for these purposes requires analyzing the geographical location based on the security parameters. *See, e.g., Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES; *5 Ways to Improve School Safety During Severe Weather*, RAPTOR. Further, the Infringing Products use the received geographical information discussed above to provide detailed “mapping solutions” and location-based assistance to first responders, school staff, and other individuals responding to emergencies:



Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

28. On information and belief, each Infringing Product is configured to generate a geofence corresponding to a geographical area based on the analyzing. For example, the Infringing Products use geofencing to “determine true emergency or drill initiations”:

Geofencing: The functionality that the Raptor System uses to determine true emergency or drill initiations. If enabled, a geofence is designated for your building and when an incident is initiated, you will know if the initiating user is in the location of said building.

Source: Raptor Alert Notification Guide, RAPTOR, at 3 (downloaded from Raptor customer Poth ISD at <https://www.pothisd.us/departments/safety-and-security/pisd-staff-resources> (last visited July 15, 2026)).

29. As another example, the geofences generated by the Infringing Products can be adjusted or modified for any necessary changes (*i.e.*, based on a new analysis):

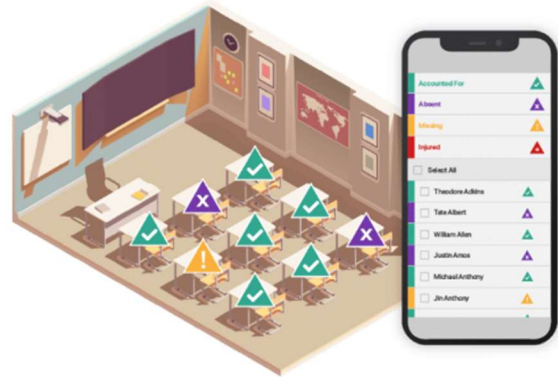
Geofences may be created during the implementation process by a Raptor Implementations Engineer with school administration guidance. Maintenance to the geofence can be facilitated any time there is a change necessary, simply by contacting Raptor Support for assistance.

Source: Attachment B, *Raptor Data Privacy*, RAPTOR, at 3 (downloaded from Raptor customer Washoe County School District at <https://washoeschools.diligent.community/document/922bb445-532f-4f27-b9e5-8020e36374e0/> (last visited July 15, 2026)).

30. On information and belief, each Infringing Product is configured to receive supervisee data and analyze it based on the geofence. For example, teachers can use the Raptor mobile app on supervisee devices to provide “real-time status and location information” (*i.e.*, supervisee data) regarding themselves and other supervisees within the geofence such as students and visitors:

Account for Everyone in Just a Few Simple Steps

Connected with your student information system, Raptor enables teachers and staff to account for themselves, students, and visitors directly in the Raptor mobile app while providing real-time status and location information.

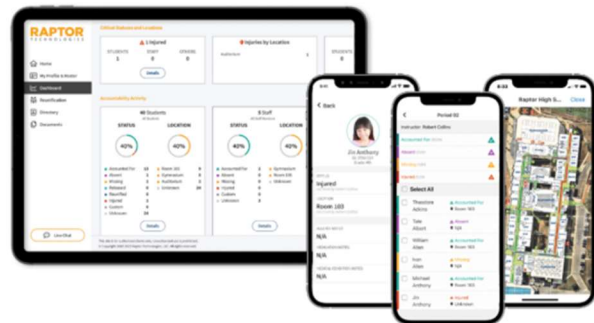


Source: *Emergency Management > Accountability*, RAPTOR, <https://raptortech.com/accountability/> (last visited July 15, 2026).

31. As another example, the Infringing Products receive and analyze supervisee data to provide emergency information to first responders, who can see that information on the geofenced map provided in the Raptor mobile app:

Give Responders the Details They Need to Save Lives

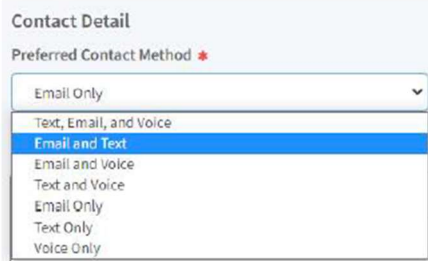
First responders can see data on all students and staff, including information on location, status, medical conditions and allergies, and guardian contact information. This helps them know where they're needed most so they can get on the scene fast and triage any victims.



Source: *Emergency Management > Accountability*, RAPTOR.

32. On information and belief, the Infringing Products generate supervision notifications based on the analysis. For example, the Infringing Products generate notifications during drills or emergencies that can be sent via various communication methods:

Notification Methods: Email, Text, and Voice call are configurable in the Users/Contacts grid in Raptor. Based on the users “Preferred Contact Method” and the contact information provided, Raptor will send any combination of these notifications to the user during a drill or emergency.



Contact Detail

Preferred Contact Method *

Email Only

Text, Email, and Voice

Email and Text

Email and Voice

Text and Voice

Email Only

Text Only

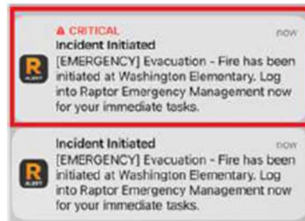
Voice Only

Push Notification: An automated message sent by an application to a user when the application is NOT OPEN. Push notifications look like SMS text messages and mobile alerts, but they only reach users who have installed the app.

Critical Notification: A form of push notification. An automated message sent by an application to a user when the application is NOT OPEN. This notification can break through silent and Do Not Disturb settings on a mobile device (dependent on model and OS). Critical alerts only reach users who have installed the app.

What type of notification did you not receive?

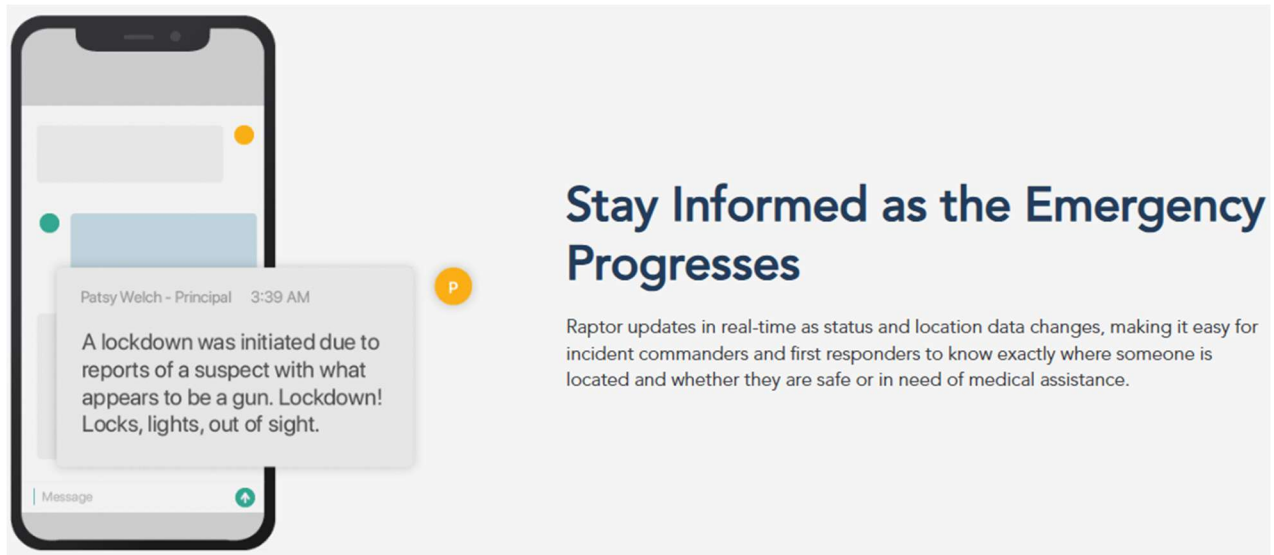
- Push Notification displayed as a pop up on the mobile app
- Critical Alert Notification and/or audible notification (highlighted red in the screen shot below)
- Text or Email Notification



Note: If you have the Raptor Alert mobile app open or you were the one that initiated the drill or emergency, you will NOT receive a notification.

Source: Raptor Alert Notification Guide, RAPTOR, at 4.

33. As another example, the Infringing Products “update[] in real-time as status and location data changes,” including by generating updated notifications:



Source: *Emergency Management > Accountability*, RAPTOR.

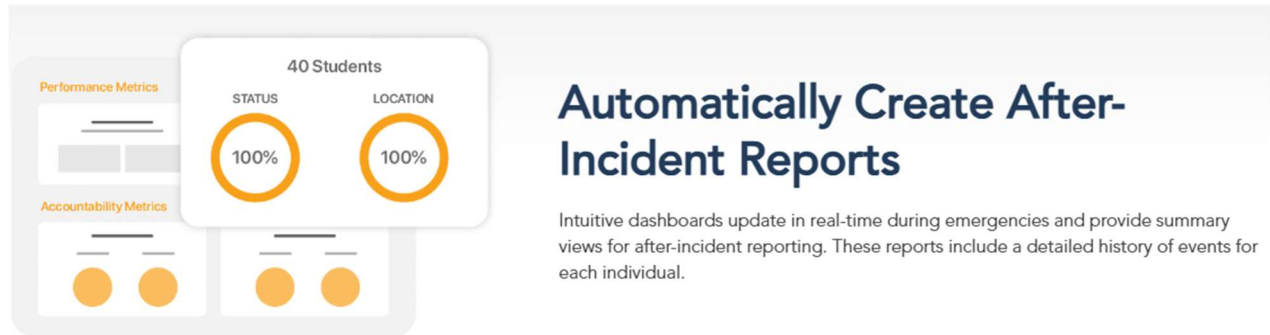
34. On information and belief, the Infringing Products transmit the supervision notifications to supervisor devices. For example, the Infringing Products deliver supervision notifications in real time to dashboards. On information and belief, these dashboards are accessed from supervisor devices because they are accessed by supervisors such as, for example, school superintendents:



Source: *Integrated School Safety Software*, RAPTOR, <https://raptortech.com/> (archived Feb. 12, 2026).

35. On information and belief, the Infringing Products store the supervisee data and supervision notifications. For example, the Infringing Products automatically create “after-

incident reports” (*i.e.*, notifications) that summarize supervisee data, including a “detailed history of events”:



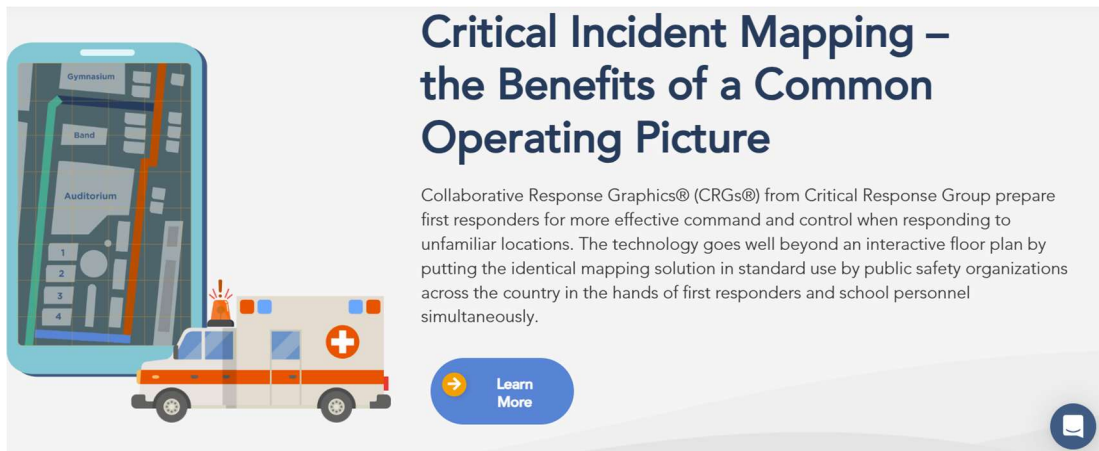
Source: *Emergency Management > Accountability*, RAPTOR.

36. As another example, the Infringing Products use a cloud-based platform that comprises a storage device:

Microsoft Azure, which hosts Raptor’s platform, is a cloud-based computing platform operated by Microsoft for application management. Raptor uses Azure for its operating systems, cache services, storage, processing, and a variety of system monitoring. Therefore, Azure’s compliance with security regulations and standards is relevant to how we deliver services to our customers. Azure undergoes rigorous auditing and is compliant with the highest industry standards for security and privacy. For a more extensive overview of Azure compliance documentation, [see here](#).

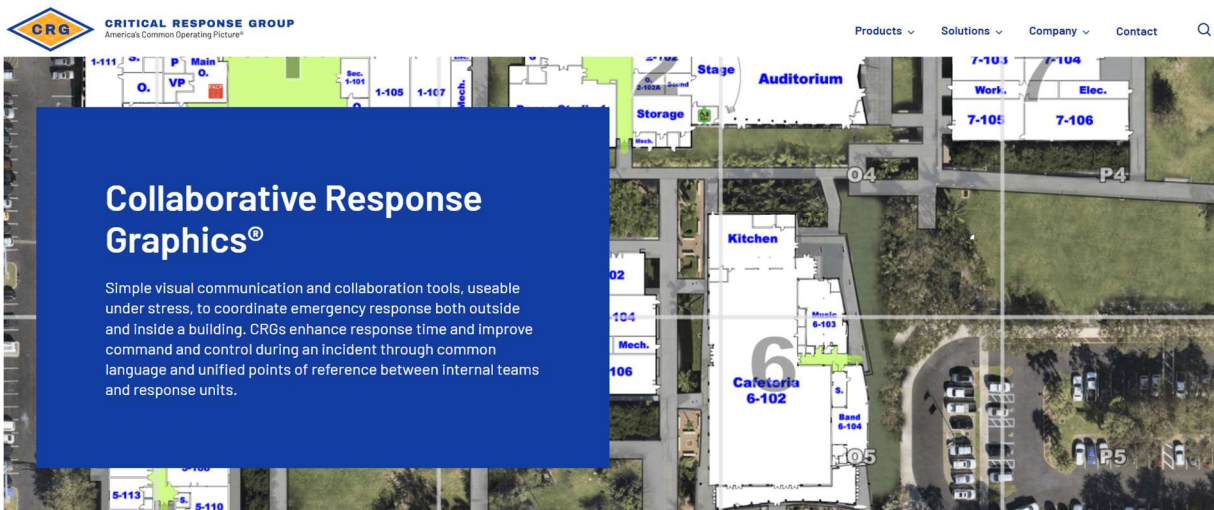
Source: Attachment B, *Raptor Data Privacy*, RAPTOR, at 6.

37. Each Infringing Product also generates a geofence that is characterized by a geofence area corresponding to the geographical area and comprises geofence grid boxes within the geofenced area. For example, Raptor advertises that the Infringing Products utilize “Critical Incident Mapping,” which displays a map of the geofenced area overlaid with geofence grid boxes:



Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

38. Additionally, on information and belief, Raptor enhances its grid-based geofencing via its partnership with CRG, using CRG’s “Collaborative Response Graphics.” CRG advertises the grid-based nature of its Collaborative Response Graphics as a key feature of the product, including a “gridded reference system” created by incorporating “key landmarks,” “critical features,” “site specific labels,” “aerial imagery,” and other parameters for determining how to establish the grid:



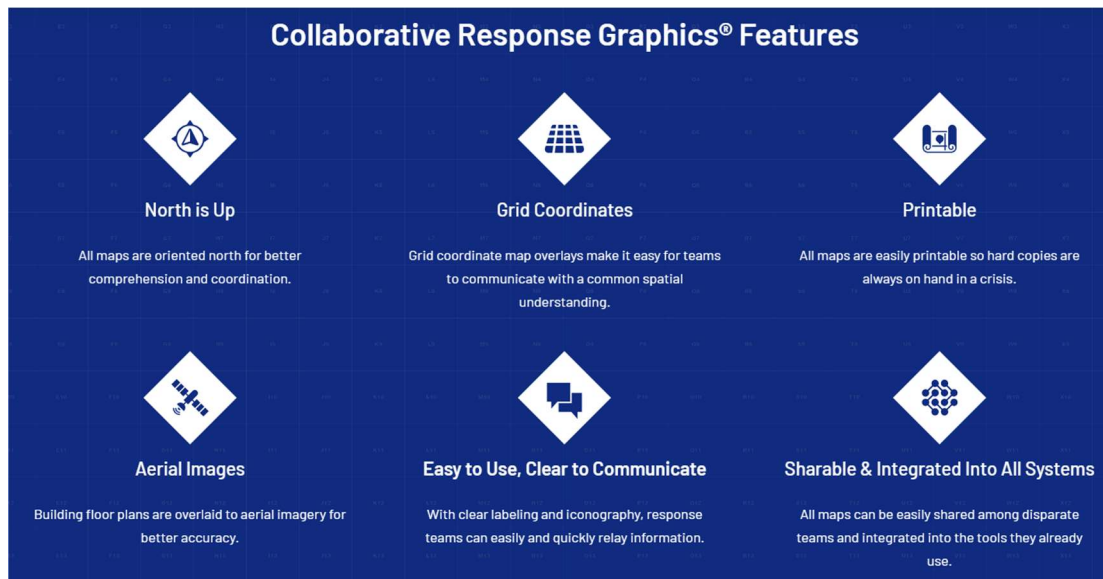


LAYER BREAKDOWN

Creating a Unified Map, Inside and Out

CRGs combine a gridded reference system, high-resolution imagery, floor plans, and critical features within a building and surrounding exterior areas to create a communication tool that is usable in a crisis and accessible by first responders through any smart device.

- 1 Grid & Template
- 2 Key Landmarks & Critical Features (AED, Gas, etc)
- 3 Site Specific Labels and Nomenclature
- 4 Highlighted Hallways, Stairwells, Doors, Exits
- 5 GeoRelevant Integrated Floorplans
- 6 Best Available Aerial Imagery



Source: *Collaborative Response Graphics*®, CRG.

39. On information and belief, the Infringing Products are configured to receive at least one grid parameter. For example, the geofences generated by the Infringing Products are created with school administration guidance (*i.e.*, using parameters provided by a supervisor):

Geofences may be created during the implementation process by a Raptor Implementations Engineer with school administration guidance. Maintenance to the geofence can be facilitated any time there is a change necessary, simply by contacting Raptor Support for assistance.

Source: Attachment B, *Raptor Data Privacy*, RAPTOR, at 4.

40. On information and belief, the Infringing Products are configured to analyze the received grid parameters, determine a grid box geofence area based on the grid parameters, and generate geofence grid boxes accordingly. As discussed above, the Infringing Products use a geofenced map comprising grid boxes. Because the Infringing Products generate a geofence that can be adjusted “at any time,” newly generated or modified geofence grid boxes are also generated when the geofence is generated.

41. On information and belief, the steps described above are performed by Defendant via its cloud-based platform, which operates from US-based servers. Further, Raptor asserts that it “owns and controls 100% of the equipment hosted” in server racks in its datacenters:

How is the datacenter physically secured? Do they collocate? If so, is their cage physically secured and how?

Answer: Entry to Raptor’s datacenter requires both a datacenter approved photo entry card as well as fingerprint verification of identity. The entry includes a “man-trap” and both of these listed items must be successfully supplied before admission. The datacenter is fully certified and audited under the following standards: SSAE 16 (SOC I type II), PCI DSS (sec 9 & 12), HIPAA, ISO 27001, and FISMA. Raptor’s server cage is locked by key and not shared with any other tenants. Raptor owns and controls 100% of the equipment hosted in our server rack.

Source: *Raptor Frequently Asked Questions*, RAPTOR, at 1 (downloaded from Raptor customer Stoughton Area School District at [https://www.stoughton.k12.wi.us/uploaded/Buildings_and_Grounds_Dept/Raptor_Frequently_Asked_Questions_\(FAQs\).pdf](https://www.stoughton.k12.wi.us/uploaded/Buildings_and_Grounds_Dept/Raptor_Frequently_Asked_Questions_(FAQs).pdf) (last visited July 19, 2026).

42. Defendant has been and is now directly infringing, literally and/or under the doctrine of equivalents because without authority it makes, uses, offers to sell, sells, and/or imports within the United States the patented invention of one or more claims, including at least claim 1 of the ’757 Patent. Defendant is therefore liable to Samscloud for patent infringement under 35 U.S.C. § 271(a).

43. Further, Defendant’s customers and end users who offer for sale, sell, and/or use the Infringing Products directly infringe at least claim 1 of the ’757 Patent.

44. Furthermore, Defendant has been and is now liable under 35 U.S.C. § 271(b) for actively inducing infringement of one or more claims including at least claim 1 of the '757 Patent. Raptor has had actual notice of the '757 Patent since at least its receipt of Samscloud's complaint. Despite such knowledge, Raptor has intended that its customers and end users infringe the '757 Patent by selling, offering for sale, importing, and/or using the Infringing Products in the United States. Raptor has also actively induced such infringement by instructing users in the United States to practice '757 Patent claims in their user manuals, posted videos and/or other materials as set forth in this complaint and with knowledge of the '757 Patent since at least the time Raptor became aware of the '757 Patent.

45. As a result of Defendant's infringement of the '757 Patent, Samscloud has suffered and continues to suffer damages. Thus, Samscloud is entitled to recover from Defendant the damages Samscloud sustained as a result of Defendant's wrongful and infringing acts in an amount no less than a reasonable royalty, together with interest and costs fixed by this Court under 35 U.S.C. § 284.

46. Defendant's infringement of the '757 Patent was, is, and continues to be deliberate and willful. Moreover, Raptor was and is on notice of the '757 Patent at least as early as the filing of the Complaint in this lawsuit, yet continued and continues to infringe the '757 Patent.

COUNT II

(Infringement of the '421 Patent)

47. Plaintiff incorporates and re-alleges the allegations contained in paragraphs 1 through 46 herein by reference.

48. The '421 Patent entitled "Systems and methods for facilitating supervision of individuals based on geofencing" was duly and legally issued by the U.S. Patent and Trademark Office on November 26, 2024, from Application No. 18/045,781, published at US2023/0056959

on February 23, 2023. The '421 Patent is a continuation-in-part of the '757 Patent and also claims priority to provisional application 62/814,097 filed on March 5, 2019. A true and accurate copy of the '421 Patent is attached hereto as Exhibit B.

49. Each and every claim of the '421 Patent is valid and enforceable, and each enjoys a statutory presumption of validity under 35 U.S.C. § 282.

50. Samscloud exclusively owns all rights, title, and interest in and to the '421 Patent and possesses the exclusive right of recovery, including the exclusive right to recover for past, present, and future infringement.

51. Claim 1 of the '421 Patent recites:

A method for facilitating supervision of individuals based on geofencing, the method comprising:
 receiving, using a communication device, at least one security parameter from at least one supervisor device associated with at least one supervisor;
 receiving, using the communication device, a geographical location from the at least one supervisor device;
 analyzing, using a processing device, the geographical location based on the at least one security parameter;
 generating, using the processing device, a geofence corresponding to a geographical area based on the analyzing;
 receiving, using the communication device, at least one supervisee data associated with a supervisee from at least one supervisee device;
 analyzing, using the processing device, the at least one supervisee data based on the geofence;
 generating, using the processing device, a supervision notification based on the analyzing of the at least one supervisee data;
 transmitting, using the communication device, the supervision notification to the at least one supervisor device; and
 storing, using a storage device, the at least one supervisee data and the supervision notification, wherein:
 the geofence is characterized by a geofence area corresponding to the geographical area, wherein the geofence comprises a plurality of geofence grid boxes associated with the geofence area, wherein each geofence grid box is characterized by a grid box geofence area of the geofence area, wherein the method comprises:
 receiving, using the communication device, at least one grid parameter from the at least one supervisor device,
 analyzing, using the processing device, the at least one grid parameter;

determining, using the processing device, the grid box geofence area based on the analyzing of the at least one grid parameter; and
generating, using the processing device, a number of geofence grid boxes based on the determining.

52. Each Infringing Product is configured to perform a method for facilitating supervision of individuals. For example, Raptor's Emergency Management Software enables schools to supervise individuals by tracking the location and status of students and staff:

EMERGENCY MANAGEMENT SOFTWARE SUITE

PREPARE **RESPOND** **RECOVER**

TRAINING & SUCCESS DRILL MANAGER RAPTOR ALERT ACCOUNTABILITY REUNIFICATION

OVERVIEW & BENEFITS

Be Ready for Any Emergency

Effectively manage drills, instantly notify first responders, accurately account for individuals and safely reunify families

- Customize Raptor to your emergency protocols to ensure everyone stays aligned
- Access Raptor wherever you are from any web-enabled device
- Integrates directly with 911 and provides enriched data to first responders
- Get the right help for small incidents and school-wide emergencies from anywhere on campus
- New users confidently configure device settings by completing a guided welcome tour
- Know exactly where students, staff, and visitors are—and their status—during emergencies
- Reunite students with approved guardians up to 4 times faster than paper and pencil
- Automatically sync with your student information system
- 100% aligned with and licensed by The “I Love U Guys” Foundation® protocols
- Comply with state mandates like Alyssa’s Law
- Intuitive, simple interface makes Raptor easy to use even in the most stressful situations

Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES, <https://raptortech.com/protect-your-school/raptor-emergency-management-system/> (archived Aug. 4, 2025).

53. Further, on information and belief, the methods performed by the Infringing Products are based on geofencing. For example, the Infringing Products utilize an “interactive floor plan” and map based on the geographical limitations of the school in which the products are

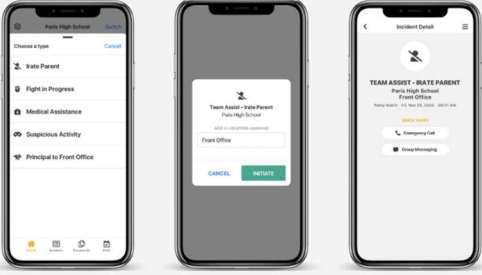
employed. The Infringing Products also enable security reports based on location within a geofenced area and security measures deployed to specific locations:



Critical Incident Mapping – the Benefits of a Common Operating Picture

Collaborative Response Graphics® (CRGs®) from Critical Response Group prepare first responders for more effective command and control when responding to unfamiliar locations. The technology goes well beyond an interactive floor plan by putting the identical mapping solution in standard use by public safety organizations across the country in the hands of first responders and school personnel simultaneously.

[Learn More](#)



RAPTOR TEAM ASSIST

Get Help for Localized Incidents

Every day, staff encounter emergencies requiring a local response, such as a medical situation, a fight in the hallway or an injured student on the playground. Raptor Team Assist, which operates in the same manner as Raptor Alert, provides configurable alert types for localized incidents as well as their own distribution lists. For example, for an injured student on the playground, a distribution list would likely include the school nurse.

[Learn More About Team Assist](#)

Account for the Location and Status of Everyone

[Learn More About Raptor Accountability](#)



Account for Everyone

Teachers and staff confirm the status and location of themselves, students, and—if using Raptor Visitor Management—visitors on campus."



Stay Updated in Real- Time

Know the precise location and status of each student, staff member, and visitor in real time.

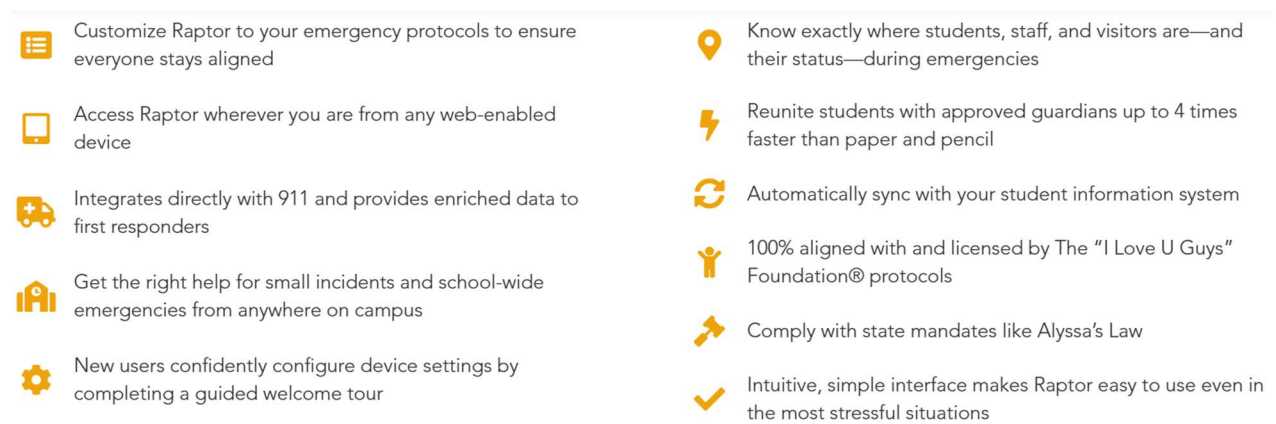


Assist Injured Persons Faster

Enable first responders to know where they're needed most by giving them access to the details, medical conditions, and locations for all individuals.

Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

54. On information and belief, each Infringing Product is configured to receive security parameters from supervisor devices. For example, supervisors can “customize Raptor to [their] emergency protocols;” those protocols include security parameters such as designated safe areas, emergency rules, drill configurations accountability settings, and alert configurations. Supervisors send those security parameters to Raptor’s cloud-based platform, which comprises a communication device:



Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

55. On information and belief, each Infringing Product is also configured to receive geographical locations from supervisor devices. For example, school administrators can upload school maps, floorplans, and evacuation plans (*i.e.*, geographical locations) to be used in emergency situations:

2. Well-defined roles and responsibilities

Eliminate confusion by making sure everyone knows what their role is during an emergency. It's best practice to designate a responsible staff member or group of individuals as your Severe Weather Coordinator(s).

Your coordinator(s) should attend local weather training and be responsible for creating your plan and determining when to activate your response. Staff Compliance Training powered by PublicSchoolWORKS (PSW) is the ideal choice for K12 schools aiming to prioritize staff safety and compliance. This robust online staff training system automates every school employee training scenario, ensuring a seamless and efficient compliance process. Severe weather course options include:

- Tornado Preparedness
- Tornado Safety
- Earthquake Preparedness
- Emergency Procedures
- Hurricane Preparedness
- Severe Weather – Occupant Safety

Further, the district's PSW Safety Advisor can also add individual school site evacuation maps to the courses.

Tip:

With the EmployeeSafe Suite powered by PublicSchoolWORKS, schools have the option to upload district or school evacuation plans/emergency procedures so that staff can easily access them digitally.

Schools can also upload any PDF into Raptor Alert, such as school maps, building floorplans, and Emergency Operations Plan (EOP). Users can access this information from wherever they are 24/7.

Source: *5 Ways to Improve School Safety During Severe Weather*, RAPTOR,

<https://raptortech.com/resources/blog/5-ways-to-improve-school-safety-during-severe-weather/>
(Mar. 24, 2025).

56. As another example, Raptor has partnered with Critical Response Group (“CRG”) to utilize CRG’s Collaborative Response Graphics and provide “detailed visual communication tools through the Raptor platform” including “GeoRelevant integrated floor plans” and geospatial data (*i.e.*, geographical locations) to establish a “gridded reference system” for use with the emergency features:



Enhance Emergency Management with CRG's Visual Communication Tools on the Raptor Platform



→ Get Started

How it Works

When integrated with Raptor, Critical Response Group (CRG) enhances emergency management by providing first responders with detailed visual communication tools through the Raptor platform.

When an emergency or Team Assist is initiated in Raptor Alert, the CRG system overlays floor plans, aerial imagery, and geospatial data on the Raptor dashboard. This integration ensures that first responders have immediate access to critical visual information, improving situational awareness and enabling swift, coordinated responses to emergencies.

Source: *Critical Response Group - CRG*, RAPTOR TECHNOLOGIES, <https://raptortech.com/about-us/critical-response-group-crg/> (last visited July 15, 2026).



LAYER BREAKDOWN

Creating a Unified Map, Inside and Out

CRGs combine a gridded reference system, high-resolution imagery, floor plans, and critical features within a building and surrounding exterior areas to create a communication tool that is usable in a crisis and accessible by first responders through any smart device.

- 1 Grid & Template
- 2 Key Landmarks & Critical Features (AED, Gas, etc)
- 3 Site Specific Labels and Nomenclature
- 4 Highlighted Hallways, Stairwells, Doors, Exits
- 5 GeoRelevant Integrated Floorplans
- 6 Best Available Aerial Imagery

Source: *Collaborative Response Graphics*®, CRG, <https://www.crgplans.com/collaborative-response-graphics/> (last visited July 15, 2026).

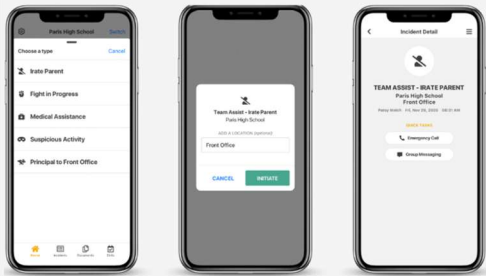
57. On information and belief, each Infringing Product is configured to analyze the geographical location based on the security parameters. For example, the Infringing Products determine designated safe zones, emergency assembly areas, and reunification locations; determining where these locations are and how safe they are for these purposes requires analyzing the geographical location based on the security parameters. *See, e.g., Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES; *5 Ways to Improve School Safety During Severe Weather*, RAPTOR. Further, the Infringing Products use the received geographical information discussed above to provide detailed “mapping solutions” and location-based assistance to first responders, school staff, and other individuals responding to emergencies:



Critical Incident Mapping – the Benefits of a Common Operating Picture

Collaborative Response Graphics® (CRGs®) from Critical Response Group prepare first responders for more effective command and control when responding to unfamiliar locations. The technology goes well beyond an interactive floor plan by putting the identical mapping solution in standard use by public safety organizations across the country in the hands of first responders and school personnel simultaneously.

[Learn More](#)



RAPTOR TEAM ASSIST

Get Help for Localized Incidents

Every day, staff encounter emergencies requiring a local response, such as a medical situation, a fight in the hallway or an injured student on the playground. Raptor Team Assist, which operates in the same manner as Raptor Alert, provides configurable alert types for localized incidents as well as their own distribution lists. For example, for an injured student on the playground, a distribution list would likely include the school nurse.

[Learn More About Team Assist](#)

Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

58. On information and belief, each Infringing Product is configured to generate a geofence corresponding to a geographical area based on the analyzing. For example, the Infringing Products use geofencing to “determine true emergency or drill initiations”:

Geofencing: The functionality that the Raptor System uses to determine true emergency or drill initiations. If enabled, a geofence is designated for your building and when an incident is initiated, you will know if the initiating user is in the location of said building.

Source: Raptor Alert Notification Guide, RAPTOR, at 3 (downloaded from Raptor customer Poth ISD at <https://www.pothisd.us/departments/safety-and-security/pisd-staff-resources> (last visited July 15, 2026).

59. As another example, the geofences generated by the Infringing Products can be adjusted or modified for any necessary changes (*i.e.*, based on a new analysis):

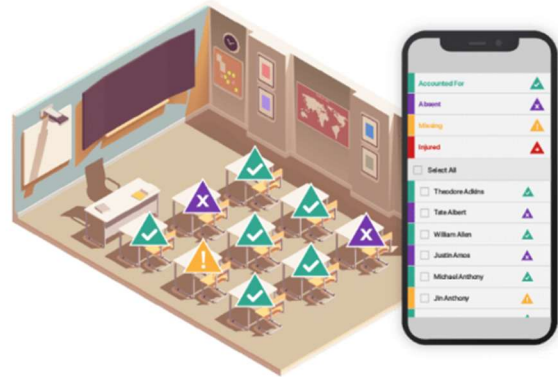
Geofences may be created during the implementation process by a Raptor Implementations Engineer with school administration guidance. Maintenance to the geofence can be facilitated any time there is a change necessary, simply by contacting Raptor Support for assistance.

Source: Attachment B, *Raptor Data Privacy*, RAPTOR, at 3 (downloaded from Raptor customer Poth ISD at <https://washoeschools.diligent.community/document/922bb445-532f-4f27-b9e5-8020e36374e0/> (last visited July 15, 2026).

60. On information and belief, each Infringing Product is configured to receive supervisee data and analyze it based on the geofence. For example, teachers can use the Raptor mobile app on supervisee devices to provide “real-time status and location information” (*i.e.*, supervisee data) regarding themselves and other supervisees within the geofence such as students and visitors:

Account for Everyone in Just a Few Simple Steps

Connected with your student information system, Raptor enables teachers and staff to account for themselves, students, and visitors directly in the Raptor mobile app while providing real-time status and location information.

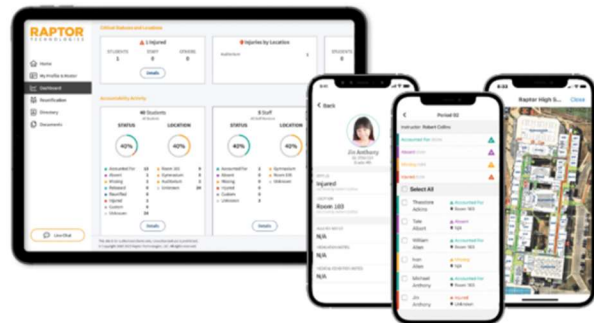


Source: *Emergency Management > Accountability*, Raptor,
<https://raptortech.com/accountability/> (last visited July 15, 2026).

61. As another example, the Infringing Products receive and analyze supervisee data to provide emergency information to first responders, who can see that information on the geofenced map provided in the Raptor mobile app:

Give Responders the Details They Need to Save Lives

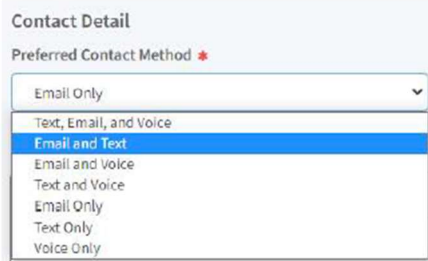
First responders can see data on all students and staff, including information on location, status, medical conditions and allergies, and guardian contact information. This helps them know where they're needed most so they can get on the scene fast and triage any victims.



Source: *Emergency Management > Accountability*, Raptor.

62. On information and belief, the Infringing Products generate supervision notifications based on the analysis. For example, the Infringing Products generate notifications during drills or emergencies that can be sent via various communication methods:

Notification Methods: Email, Text, and Voice call are configurable in the Users/Contacts grid in Raptor. Based on the users “Preferred Contact Method” and the contact information provided, Raptor will send any combination of these notifications to the user during a drill or emergency.



Contact Detail

Preferred Contact Method *

Email Only

Text, Email, and Voice

Email and Text

Email and Voice

Text and Voice

Email Only

Text Only

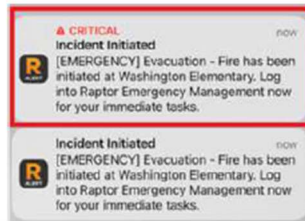
Voice Only

Push Notification: An automated message sent by an application to a user when the application is NOT OPEN. Push notifications look like SMS text messages and mobile alerts, but they only reach users who have installed the app.

Critical Notification: A form of push notification. An automated message sent by an application to a user when the application is NOT OPEN. This notification can break through silent and Do Not Disturb settings on a mobile device (dependent on model and OS). Critical alerts only reach users who have installed the app.

What type of notification did you not receive?

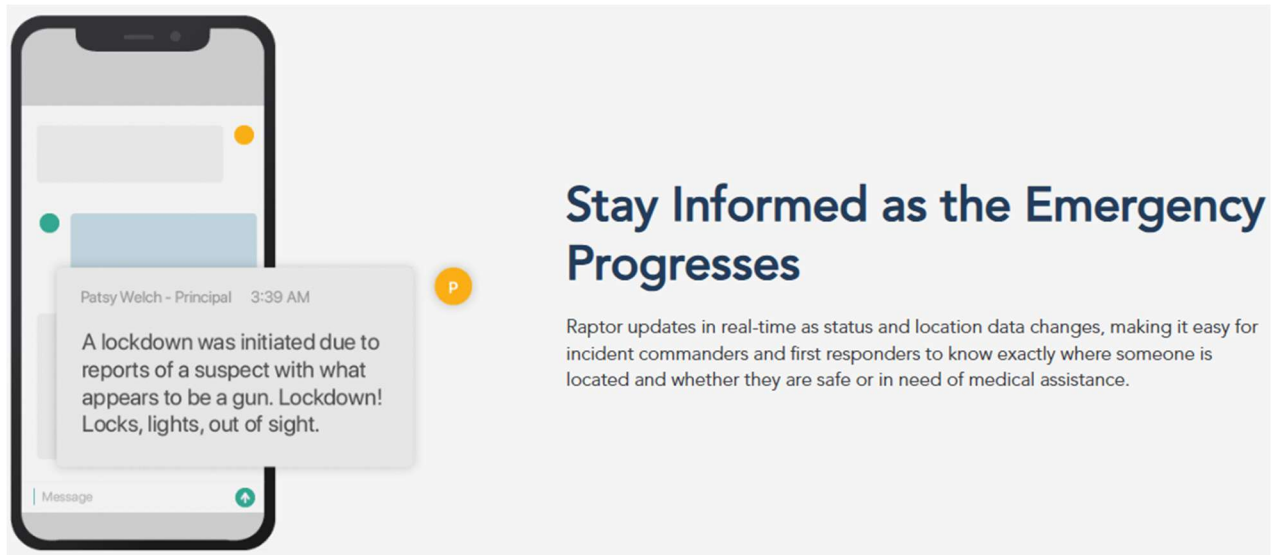
- Push Notification displayed as a pop up on the mobile app
- Critical Alert Notification and/or audible notification (highlighted red in the screen shot below)
- Text or Email Notification



Note: If you have the Raptor Alert mobile app open or you were the one that initiated the drill or emergency, you will NOT receive a notification.

Source: Raptor Alert Notification Guide, RAPTOR, at 4.

63. As another example, the Infringing Products “update[] in real-time as status and location data changes,” including by generating updated notifications:



Source: *Emergency Management > Accountability*, RAPTOR.

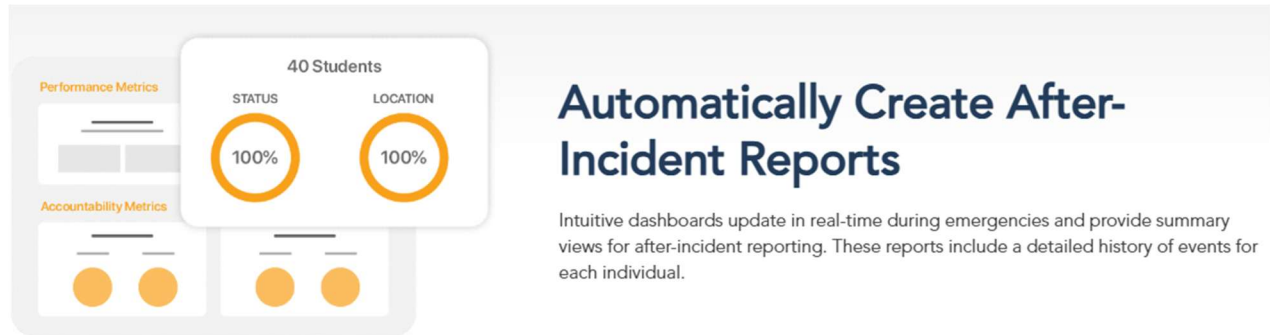
64. On information and belief, the Infringing Products transmit the supervision notifications to supervisor devices. For example, the Infringing Products deliver supervision notifications in real time to dashboards. On information and belief, these dashboards are accessed from supervisor devices because they are accessed by supervisors such as, for example, school superintendents:



Source: *Integrated School Safety Software*, RAPTOR, <https://raptortech.com/> (archived Feb. 12, 2026).

65. On information and belief, the Infringing Products store the supervisee data and supervision notifications. For example, the Infringing Products automatically create “after-

incident reports” (*i.e.*, notifications) that summarize supervisee data, including a “detailed history of events”:



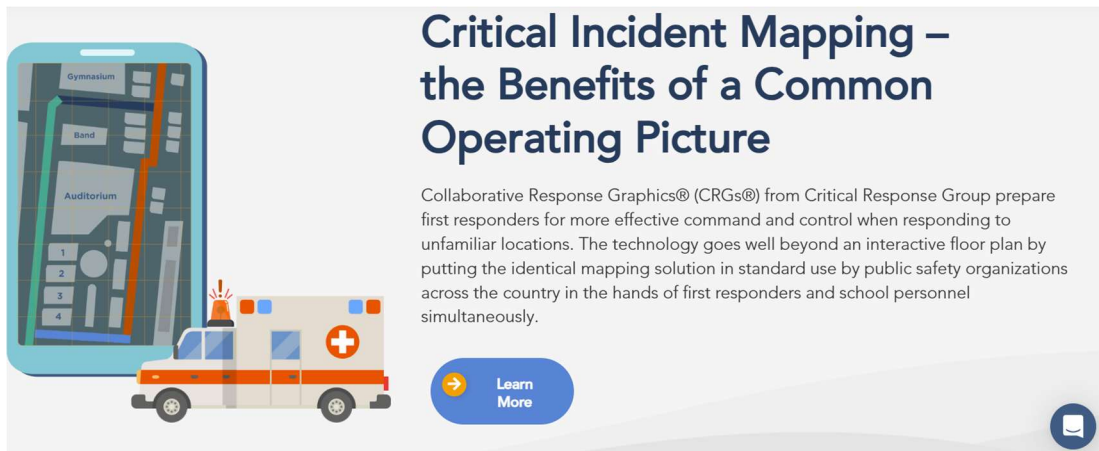
Source: *Emergency Management > Accountability*, RAPTOR.

66. As another example, the Infringing Products use a cloud-based platform that comprises a storage device:

Microsoft Azure, which hosts Raptor’s platform, is a cloud-based computing platform operated by Microsoft for application management. Raptor uses Azure for its operating systems, cache services, storage, processing, and a variety of system monitoring. Therefore, Azure’s compliance with security regulations and standards is relevant to how we deliver services to our customers. Azure undergoes rigorous auditing and is compliant with the highest industry standards for security and privacy. For a more extensive overview of Azure compliance documentation, [see here](#).

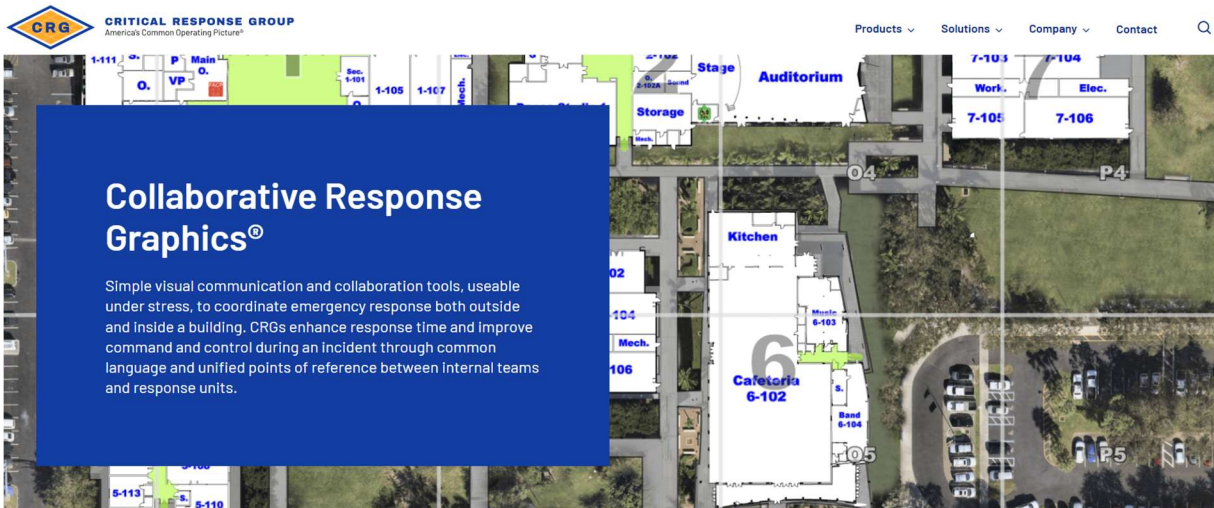
Source: Attachment B, *Raptor Data Privacy*, RAPTOR, at 6.

67. Each Infringing Product also generates a geofence that is characterized by a geofence area corresponding to the geographical area and comprises geofence grid boxes within the geofenced area. For example, Raptor advertises that the Infringing Products utilize “Critical Incident Mapping,” which displays a map of the geofenced area overlaid with geofence grid boxes:



Source: *Emergency Management Software for Schools*, RAPTOR TECHNOLOGIES.

68. Additionally, on information and belief, Raptor enhances its grid-based geofencing via its partnership with CRG, using CRG’s “Collaborative Response Graphics.” CRG advertises the grid-based nature of its Collaborative Response Graphics as a key feature of the product, including a “gridded reference system” created by incorporating “key landmarks,” “critical features,” “site specific labels,” “aerial imagery,” and other parameters for determining how to establish the grid:



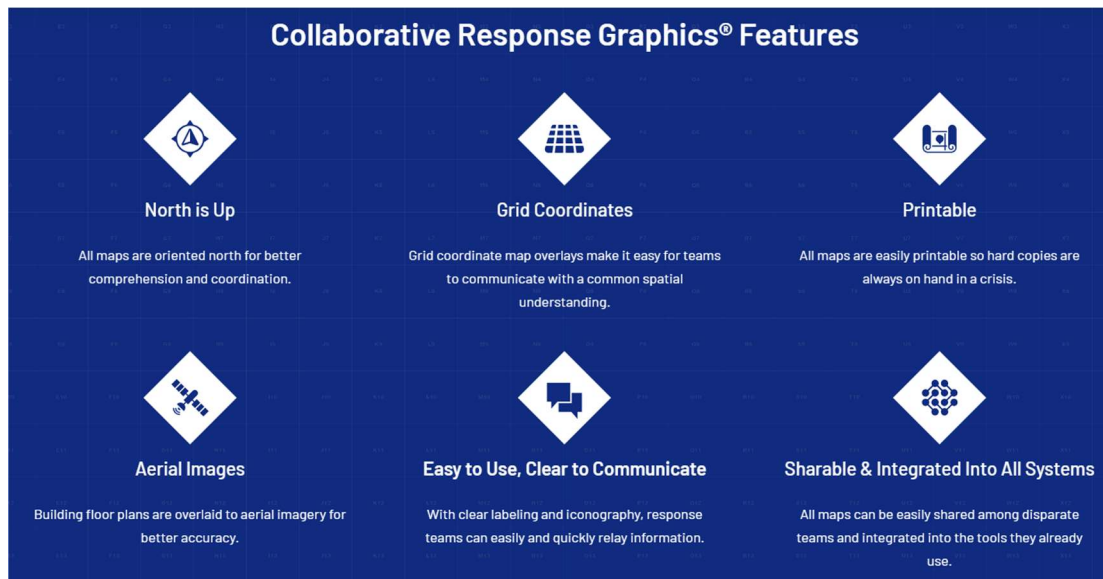


LAYER BREAKDOWN

Creating a Unified Map, Inside and Out

CRGs combine a gridded reference system, high-resolution imagery, floor plans, and critical features within a building and surrounding exterior areas to create a communication tool that is usable in a crisis and accessible by first responders through any smart device.

- 1 Grid & Template
- 2 Key Landmarks & Critical Features (AED, Gas, etc)
- 3 Site Specific Labels and Nomenclature
- 4 Highlighted Hallways, Stairwells, Doors, Exits
- 5 GeoRelevant Integrated Floorplans
- 6 Best Available Aerial Imagery



Source: *Collaborative Response Graphics*®, CRG.

69. On information and belief, the Infringing Products are configured to receive at least one grid parameter. For example, the geofences generated by the Infringing Products are created with school administration guidance (*i.e.*, using parameters provided by a supervisor):

Geofences may be created during the implementation process by a Raptor Implementations Engineer with school administration guidance. Maintenance to the geofence can be facilitated any time there is a change necessary, simply by contacting Raptor Support for assistance.

Source: Attachment B, *Raptor Data Privacy*, RAPTOR, at 4.

70. On information and belief, the Infringing Products are configured to analyze the received grid parameters, determine a grid box geofence area based on the grid parameters, and generate geofence grid boxes accordingly. As discussed above, the Infringing Products use a geofenced map comprising grid boxes. Because the Infringing Products generate a geofence that can be adjusted “at any time,” newly generated or modified geofence grid boxes are also generated when the geofence is generated.

71. On information and belief, the steps described above are performed by Defendant via its cloud-based platform, which operates from US-based servers. Further, Raptor asserts that it “owns and controls 100% of the equipment hosted” in server racks in its datacenters:

How is the datacenter physically secured? Do they collocate? If so, is their cage physically secured and how?

Answer: Entry to Raptor’s datacenter requires both a datacenter approved photo entry card as well as fingerprint verification of identity. The entry includes a “man-trap” and both of these listed items must be successfully supplied before admission. The datacenter is fully certified and audited under the following standards: SSAE 16 (SOC I type II), PCI DSS (sec 9 & 12), HIPAA, ISO 27001, and FISMA. Raptor’s server cage is locked by key and not shared with any other tenants. Raptor owns and controls 100% of the equipment hosted in our server rack.

Source: *Raptor Frequently Asked Questions*, RAPTOR, at 1 (downloaded from Raptor customer Stoughton Area School District at [https://www.stoughton.k12.wi.us/uploaded/Buildings_and_Grounds_Dept/Raptor_Frequently_Asked_Questions_\(FAQs\).pdf](https://www.stoughton.k12.wi.us/uploaded/Buildings_and_Grounds_Dept/Raptor_Frequently_Asked_Questions_(FAQs).pdf) (last visited July 19, 2026).

72. Defendant has been and is now directly infringing, literally and/or under the doctrine of equivalents because without authority it makes, uses, offers to sell, sells, and/or imports within the United States the patented invention of one or more claims, including at least claim 1 of the ’421 Patent. Defendant is therefore liable to Samscloud for patent infringement under 35 U.S.C. § 271(a).

73. Further, Defendant’s customers and end users who offer for sale, sell, and/or use the Infringing Products directly infringe at least claim 1 of the ’421 Patent.

74. Furthermore, Defendant has been and is now liable under 35 U.S.C. § 271(b) for actively inducing infringement of one or more claims including at least claim 1 of the '421 Patent. Raptor has had actual notice of the '421 Patent since at least its receipt of Samscloud's complaint. Despite such knowledge, Raptor has intended that its customers and end users infringe the '421 Patent by selling, offering for sale, importing, and/or using the Infringing Products in the United States Raptor has also actively induced such infringement by instructing users in the United States to practice '421 Patent claims in their user manuals, posted videos and/or other materials as set forth in this complaint and with knowledge of the '421 Patent since at least the time Raptor became aware of the '421 Patent.

75. As a result of Defendant's infringement of the '421 Patent, Samscloud has suffered and continues to suffer damages. Thus, Samscloud is entitled to recover from Defendant the damages Samscloud sustained as a result of Defendant's wrongful and infringing acts in an amount no less than a reasonable royalty, together with interest and costs fixed by this Court under 35 U.S.C. § 284.

76. Defendant's infringement of the '421 Patent was, is, and continues to be deliberate and willful. Moreover, Raptor was and is on notice of the '421 Patent at least as early as the filing of the Complaint in this lawsuit, yet continued and continues to infringe the '421 Patent.

CONCLUSION

77. Defendant has directly and/or indirectly infringed on Plaintiff's rights as owner of the Asserted Patents. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court.

78. Plaintiff has incurred and will incur attorneys' fees, costs, and expenses in the prosecution of this action. The circumstances of this dispute may give rise to an exceptional case

within the meaning of 35 U.S.C. § 285, and Plaintiff is entitled to recover its reasonable and necessary attorneys' fees, costs, and expenses.

JURY DEMAND

79. Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

80. Plaintiff requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

1. A judgment that Defendant has infringed the Asserted Patents as alleged herein;
2. A judgment that Defendant's infringement of the Asserted Patents was deliberate and willful;
3. A judgment for an accounting of damages sustained by Plaintiff as a result of the acts of infringement by Defendant;
4. A judgment and order requiring Defendant to pay Plaintiff damages under 35 U.S.C. § 284, including up to treble damages as provided by 35 U.S.C. § 284, and any royalties determined to be appropriate;
5. A judgment and order requiring Defendant to pay Plaintiff pre-judgment and post-judgment interest on the damages awarded;
6. A judgment and order finding this to be an exceptional case and requiring Defendant to pay the costs of this action (including all disbursements) and attorneys' fees as provided by 35 U.S.C. § 285; and
7. Such other and further relief as the Court deems just and equitable.

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