IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:15-cv-01380

DOT HILL SYSTEMS CORP.,

Plaintiff,

v.

CROSSROADS SYSTEMS, INC.

Defendant.

COMPLAINT FOR PATENT INFRINGEMENT AND JURY DEMAND

Plaintiff Dot Hill Systems Corp. complains against Defendant Crossroads Systems, Inc. as follows:

THE PARTIES

1. Dot Hill Systems Corp. ("Dot Hill") is a Delaware corporation with a principal place of business of 1351 S. Sunset St., Longmont, Colorado 80501.

2. Crossroads Systems, Inc. ("Crossroads") is a Delaware corporation with a principal place of business at 11000 North MoPac Expressway #150, Austin, Texas 78759.

JURISDICTION AND VENUE

3. This is an action for patent infringement under 35 U.S.C. § 271 *et seq.*

4. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1338 because all claims in this action arise under the patent laws of the United States.

5. Crossroads is subject to personal jurisdiction and venue is this district as established under 28 U.S.C. §§ 1391 and 1400. Crossroads does and has done business in the District of Colorado, including: (i) making, using, or selling infringing goods; (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving revenue from goods used or consumed by, and services provided to, persons in the state of Colorado; and (iii) Crossroads employees reside in and conduct business in and from Colorado. Crossroads's President and Chief Executive Officer, Richard K. Coleman, resides in, and regularly conducts business from Colorado. Christopher Kehoe, Crossroads's Director of Solutions Architecture, also resides in and conducts business from Colorado. Crossroads has minimum contacts with this forum such that the exercise of jurisdiction over Crossroads would not offend traditional notions of fair play and substantial justice.

BACKGROUND

6. Plaintiff Dot Hill is a leader in the data storage industry, providing software and hardware solutions for storing, sharing, protecting, and managing data. The products at issue in this case include data storage hardware and software that provide access control features to data storage systems.

7. On October 2, 2007, United States Patent No. 7,277,995 ("the '995 Patent") entitled "Storage Controller and Method for Performing Host Access Control in the Host Interface Adapter" issued to Ian Davies and Thomas Wicklund. The '995 Patent claims a storage controller that provides controlled access to storage devices by host computers. A copy of the

'995 Patent is attached as Exhibit A. Dot Hill has been, and is, the owner and assignee of all rights, title, and interest in and to the '995 Patent since it issued.

FIRST CAUSE OF ACTION
(Infringement of the '995 Patent)

8. Dot Hill incorporates by reference paragraphs 1 – 7.

9. Crossroads directly infringes, literally or by equivalents, one or more of the claims of the '995 Patent by, without authorization, making, using, offering to sell, selling, and importing into the United States or exporting from the United States, infringing systems, including without limitation the Crossroads StrongBox VSeries and similar products that include a storage controller that provides controlled access to storage devices by host computers. These products infringe at least claims 1 and 24 of the '995 Patent.

10. Dot Hill has suffered damages as a result of Crossroads's infringement of the '995 Patent and will suffer additional damages as a result of Crossroads's continuing infringement.

11. For ongoing and future infringement, Dot Hill will continue to suffer irreparable harm unless this Court enjoins Crossroads, its agents, employees, representatives, and all others acting in concert with Crossroads from infringing the '995 Patent. If the Court denies injunctive relief, Dot Hill is entitled to ongoing royalty damages in lieu of an injunction.

DEMAND FOR RELIEF

WHEREFORE, DOT HILL respectfully requests the following relief:

a) That this Court adjudge and decree that Crossroads has been and is currently infringing the '995 Patent;

b) That this Court enjoin Crossroads and all those in privity with Crossroads pursuant to 35 U.S.C. § 283 from infringing the '995 Patent;

c) That this Court order Crossroads to:

i. recall and collect from all persons and entities that have purchased any and all products found to infringe the asserted patent that were made, offered for sale, sold, imported, or otherwise distributed in the United States by Crossroads or its privies or agents;

ii. destroy or deliver all such infringing products to Dot Hill;

iii. revoke all licenses to all such infringing products;

iv. disable or modify all web pages offering or advertising all such infringing products; and

v. destroy all other marketing materials relating to all such infringing products;

d) That this Court award damages to Dot Hill pursuant to 35 U.S.C. §§ 284 and 287 in an amount that is adequate to compensate it for each of the unlawful actions set forth in this Complaint, in an amount no less than a reasonable royalty;

e) That this Court award pre-judgment and post-judgment interest on such damages to Dot Hill and order an accounting of damages that accrue between the close of fact discovery and the date a final judgment is entered in this litigation;

f) That this Court determine that this patent infringement case is exceptional and award Dot Hill its costs and attorneys' fees incurred in this action pursuant to 35 U.S.C. § 285; and

g) That this Court award Dot Hill such other relief as the Court deems just and proper.

Dated: June 29, 2015

Respectfully submitted,

/s/ Orion Armon

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Attorneys for Plaintiff Dot Hill Systems Corp.

DEMAND FOR JURY TRIAL

Dot Hill respectfully requests a trial by jury on all issues triable thereby.

Dated: June 29, 2015

Respectfully submitted,

/s/ Orion Armon

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