

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DR. LAKSHMI ARUNACHALAM,

Plaintiff,

v.

**INTERNATIONAL BUSINESS
MACHINES CORPORATION AND
DOES 1-100,**

Defendant(s).

C.A. No. _____

**COMPLAINT FOR PATENT
INFRINGEMENT AND VERIFIED
COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF AND
DAMAGES FROM RACKETEERING,
CONSPIRACY TO ENGAGE IN A
PATTERN OF RACKETEERING
ACTIVITY AND RELATED CLAIMS;**

Date Filed: April 18, 2016
JURY TRIAL DEMANDED

18 U. S. C. 1961 et seq.;
18 U. S. C. 1964
(Civil RICO Remedies);

CERTIFICATE OF MAILING

I, Dr. Lakshmi Arunachalam, hereby certify that on April 18, 2016, I filed an original and one copy of the attached "COMPLAINT FOR PATENT INFRINGEMENT AND VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND DAMAGES FROM RACKETEERING, CONSPIRACY TO ENGAGE IN A PATTERN OF RACKETEERING ACTIVITY AND RELATED CLAIMS," Dr. Arunachalam's Declaration and Verification in support thereof, and Exhibits along with the cover sheet, requisite filing fees in the form of a money order and Form AO-440, Summons in a Civil Action with the Clerk of the Court, U.S. District Court for the District of Delaware by Express Mail via the U.S. Post Office by overnight delivery for filing and docketing in this case to:

Clerk of Court
U.S. District Court for the District of Delaware,
844 N. King Street, Unit 18,
Wilmington, DE 19801.

Lakshmi Arunachalam

DATED: April 18, 2016

Dr. Lakshmi Arunachalam
222 Stanford Avenue
Menlo Park, CA 94025
650 690 0995
laks22002@yahoo.com

ⁱ *I. Bryn Mar. Ltd v. Carlton Browne and Co., Inc.*, No. 82-0696-E (S.D. Cal. 1983).

ⁱⁱ *United States v. Cauble*, 706 F.2d 1322 (5th Cir.), *cert den.*, 465 U.S. 1005 (1983)

ⁱⁱⁱ *See In re American Honda Motor Co., Inc. Dealerships Relations Litigation*, 941 F.Supp. 528, 555 (D. Md. 1996) (adopting *Moffat*'s reasoning that 1962(a) and (b) properly apply to activities in the nature of acquiring a proprietary stake in an enterprise, not simply obtaining some influence over discretionary activities); *Moffat Enterprises, Inc. v. Borden, Inc.* 763 F. Supp. 143 (W.D. Pa. 1990).

^{iv} *State v. Nine Say. Accounts*, 553 So. 2d 823 (La. 1989); *Guerro v. Katzen*, 571 F. Supp. 714 (D.C. Cir. 1983).

^v *O'Brien v. Dean Witter Reynolds, Inc.* 1984 WL 608 (D. Ariz. 1984).

^{vi} *Sutliff Inc. v. Donovan Companies, Inc.*, 727 F.2d 648 (7th Cir. 1984) (criticized on other grounds by *Rose v. Mony Life Ins.*, 82 F. Supp. 2d 920, 924 (N.D. Ill. 2000)).

^{vii} *US. v. Campione*, 942 F.2d 429, 438 (7th Cir. 1991)

^{viii} *In Re Sahien & Assoc., Inc. Securities Litigation*, 773 F. Supp. 342 (S.D. Fla. 1991). *See Jaguar Cars, Inc. v. Royal Oaks Motor Car Co.*, 46 F.3d 258 (3d. Cir. 1995) (holding that in order to prove aiding and abetting in predicate act party must show that the defendant alleged to have aided and abetted the act knew of the commission of the act and acted with intent to facilitate it).