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10 UNITED STATES DISTRICT COURT
11 FOR THE SOUTHERN DISTRICT OF TEXAS
12 HOUSTON DIVISION

13 JAMES B. GOODMAN,
14 Plaintiff,
15 vs.
16 ON SEMICONDUCTOR CORPORATION
17 Defendant.

Civil Action No.

**COMPLAINT FOR PATENT
INFRINGEMENT AND DEMAND FOR
JURY TRIAL**

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19 NOW COMES Plaintiff, JAMES B. GOODMAN (“Goodman”), through his attorney,
20 and files this Complaint for Patent Infringement and Demand for Jury Trial against ON
21 Semiconductor Corporation (“ON Semiconductor”).

22 **PARTIES**

- 23 1. Plaintiff Goodman is an individual residing in the State of Texas.
24 2. Defendant ON Semiconductor is a corporation with a corporate office at 5005 E.
25 McDowell Road MS C 250, Phoenix, AZ 85008 and a Central Sales Office in
26 Houston, TX.
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JURISDICTION AND VENUE

- 3. This is an action for patent infringement of United States Patent No. 6,243,315 (hereinafter “The ‘315 Patent”) pursuant to the laws of the United States of America as set forth in Title 35 Sections 271 and 281 of the United States Code. This court has subject matter jurisdiction over this action pursuant to 28 U.S.C. Sec. 1338(a) and 28 U.S.C. Sec. 1331. Venue is proper in this judicial district under 28 U.S.C. §§§ 1391(b), © and 1400(b).
- 4. On information and belief, the Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and/or the Texas Long Arm Statute, due to at least its respective business presence in this forum, and its infringing activities in this Federal District.
- 5. On information and belief from the web site maintained by the Defendant, the Defendant maintains a Central Sales Office in Houston, TX for offering for sale and selling products including infringing products.
- 6. Defendant has impliedly agree to be subject to this Jurisdiction and Venue due to its corporate presence and its extensive business activities in this Judicial District.

CAUSES OF ACTION FOR PATENT INFRINGEMENT

- 7. On June 5, 2001, the ‘315 Patent entitled “COMPUTER MEMORY SYSTEM WITH A LOW POWER MODE”, was duly and legally issued to James B. Goodman, as the sole patentee.
- 8. Plaintiff Goodman is the sole owner of the ‘315 Patent, and has standing to bring this action.

COUNT ONE

- 9. Plaintiff Goodman repeats and incorporates herein the allegations contained in paragraphs 1 through 8 above.
- 10. Defendant is infringing at least claim 1 of the ‘315 Patent at the least with its products: N08L63W2A (8 Mb, 3 V Parallel SRAM Memory), and N08L6182A (8 Mb Ultra-Low Power Asynchronous CMOS SRAM).

JURY DEMAND

11. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues in this lawsuit.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court to:

- a. enter judgment for Plaintiff on this Complaint;
- b. order that an accounting be had for the damages caused to the Plaintiff by the infringing activities of the Defendant;
- c. award Plaintiff interest and costs;
- d. enter a permanent injunction to enjoin Defendant and those in privity with or acting in concert with Defendant from further infringement of the patent-in-suit during the remainder of the term of the patent-in-suit; and
- e. award Plaintiff such other and further relief as this Court may deem just and equitable.

THE PLAINTIFF

JAMES B. GOODMAN

/s/ David Fink
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