UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

JAMES B. GOODMAN, Plaintiff, vs. ALLIANCE MEMORY, INC. Defendant.	Civil Action No. **COMPLAINT FOR PATENT INFRINGEMENT AND DEMAND FOR JURY TRIAL**

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NOW COMES Plaintiff, JAMES B. GOODMAN ("Goodman" herein), through his attorneys, and files this Complaint for Patent Infringement and Demand for Jury Trial against ALLIANCE MEMORY, INC. ("Alliance" herein)

PARTIES

1. Plaintiff Goodman is an individual residing in the State of Texas.

2. On information and belief from the web site for Defendant Alliance, the U.S. Headquarters is located at 551 Taylor Way, Suite #1, San Carlos, CA 94070.

3. On information and belief from the web site for Alliance, Alliance sells, advertises, and distributes at least 29 different products through ten companies in Texas, with two distributors having offices in Houston, TX:

Future Electronics
10333 Richmond Avenue, Suite 970
Houston, TX 77042; and

Future Electronics
11451 Katy Freeway Suite 201
Houston, TX 77079.

JURISDICTION AND VENUE

4. 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), (c) and 1400(b).

5. On information and belief, Alliance 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 business presence in this forum, including the infringement alleged herein.

6. On information and belief, Alliance, directly and/or through intermediaries, advertise at least through web sites, offers to sell, sold and/or distributed infringing products, and/or have induced the sale and use of infringing products. In addition, and on information and belief, Alliance is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas.

7. Venue is proper in this district because on information and belief, Alliance has committed at least a portion of the infringement at issue in this case, and has a corporate presence in this forum.

INTRADISTRICT ASSIGNMENT

8. This is an action for Patent Infringement, which is an excepted category under Civil L.R. 3-2(c). Pursuant to Civil L.R. 3-2(c), this action is assigned on a district-wide basis.

CAUSES OF ACTION FOR PATENT INFRINGEMENT

9.   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.

10.   Plaintiff Goodman is the sole owner of the '315 Patent, and has standing to bring this action.

COUNT ONE

11.   Plaintiff Goodman repeats and incorporates herein the allegations contained in paragraphs 1 through 10 above.

12.   Alliance is infringing at least claim 1 of the '315 Patent at the least with its products known in the industry as "Low Power CMOS SRAM" such as Alliance product AS6C1016 which includes Lower and Upper Byte Control.

JURY DEMAND

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

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; and

d.   award Plaintiff such other and further relief as this Court may deem just and equitable.

THE PLAINTIFF
JAMES B. GOODMAN

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