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**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

JAMES B. GOODMAN,

Plaintiff,

vs.

CORSAIR COMPONENTS, INC.

Defendant.

\*\*\*\*\*

**Civil Action No.**

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

NOW COMES Plaintiff, JAMES B. GOODMAN (“Goodman” herein), through his attorney, and files this Complaint for Patent Infringement and Demand for Jury Trial against CORSAIR COMPONENTS, INC. (“Corsair” herein)

**PARTIES**

1. Goodman is an individual residing in the State of Texas.
2. On information and belief from the web site for Corsair, the U.S. Corporate Headquarters is located at 46221 Landing Parkway, Fremont, CA 94538.
3. On information and belief from the web site for Corsair, Corsair promotes the purchase of its products in this Federal Jurisdiction on its web site, and through local merchants in this Federal Jurisdiction including Fry’s Electronics, Micro Center, and Best Buy.

**JURISDICTION AND VENUE**

- 1
- 2 5. This is an action for patent infringement of United States Patent No. 6,243,315
- 3 (hereinafter “The ‘315 Patent”) pursuant to the laws of the United States of
- 4 America as set forth in Title 35 Sections 271 and 281 of the United States Code.
- 5 This court has subject matter jurisdiction over this action pursuant to 28 U.S.C.
- 6 Sec. 1338(a) and 28 U.S.C. Sec. 1331. Venue is proper in this judicial district
- 7 under 28 U.S.C. §§ 1391(b), (c) and 1400(b).
- 8 6. On information and belief, Corsair is subject to this Court’s specific and general
- 9 personal jurisdiction, pursuant to due process and/or the Texas Long Arm Statute,
- 10 due to at least its business presence in this forum, including the infringement
- 11 alleged herein.
- 12 7. On information and belief, Corsair, directly and/or through intermediaries,
- 13 advertise at least through web sites and other web sites, offers to sell, sold and/or
- 14 distributed its memory products, and/or has induced the sale and use of its
- 15 memory products in this Judicial District. In addition, and on information and
- 16 belief, Corsair is subject to the Court’s general jurisdiction, including from
- 17 regularly doing business, or soliciting business, or engaging in other persistent
- 18 courses of conduct, and/or deriving substantial revenue from goods and services
- 19 provided to individuals and businesses in this Judicial District.
- 20 8. Venue is proper in this district because on information and belief, Corsair has
- 21 committed at least a portion of the infringement at issue in this case in this
- 22 Judicial District.

**BACKGROUND**

- 23
- 24 9. The relevant memory product sold by Corsair are within the standards established
- 25 by the JEDEC Solid State Technology Association, 3103 North 10<sup>th</sup> Street, Suite
- 26 240-S, Arlington, VA 22201. The standards published by JEDEC state: “No
- 27 claims to be in conformance with this standard may be made unless all
- 28 requirements stated in the standard are met.”

- 1 10. Thus, any memory product identified as being DDR2, DDR3, or DDR4 implies  
2 that the memory product conforms with the following JEDEC Standards JESD79-  
3 2F (for DDR2), JESD79-3F(for DDR3), or DESD79-4 (for DDR4), respectively.  
4 Each of these JEDEC Standard discloses that the memory product has at least two  
5 banks of memory (which is the equivalent of a plurality of memories), the main  
6 memory component of each memory product is a volatile memory (SDRAM), and  
7 each memory product is capable of a power down mode for a bank of memory  
8 when there is no activity and this power down mode makes the input lines in a  
9 “don’t care” state so nothing can go into the memory bank in a power down mode  
10 The “refresh” of the memory components is enabled in the power down mode.  
11 11. Corsair sells and offers for sale at its web site memory units DDR2, DDR3, and  
12 DDR4 for use in this Judicial District.

13 **CAUSES OF ACTION FOR PATENT INFRINGEMENT**

- 14 12. On June 5, 2001, the ‘315 Patent entitled “COMPUTER MEMORY SYSTEM  
15 WITH A LOW POWER MODE”, was duly and legally issued to James B.  
16 Goodman, as the sole patentee.  
17 13. Plaintiff Goodman is the sole owner of the ‘315 Patent, and has standing to bring  
18 this action.  
19 14. Plaintiff Goodman has previously sued on the ‘315 Patent for patent infringement  
20 and licensed the following companies in the business of computer memory  
21 products: Alliance, Atmel, Infineon, Intel, Fujitsu, Elpida, Spansion, Hynix, ON  
22 Semiconductor, Nan Ya, and ISSI. In addition, IBM, Toshiba, Sanisung, and  
23 Sharp are licensed under the ‘315 Patent.  
24 15. On information and belief, Corsair knew of the litigation by Plaintiff Goodman  
25 enforcing his rights under the ‘315 Patent covering the claimed memory products,  
26 but Corsair continued to sell its memory products, DDR2, DDR3, and DDR4  
27 products, with the intent to induce and to encourage people and companies to  
28 incorporate the memory products into systems to result in patent infringement of

1 the '315 Patent.

- 2 16. On information and belief, Corsair knew that its aforementioned memory products  
3 had no other use other than for infringement of the '315 Patent in combination  
4 with other components to result in infringement computer components.

5 **COUNT ONE**

- 6 17. Plaintiff Goodman repeats and incorporates herein the allegations contained in  
7 paragraphs 1 through 16 above.

- 8 18. Corsair is knowingly inducing patent infringement of at least claim 1 of the '315  
9 Patent at the least with its memory products known in the industry as DDR2,  
10 DDR3 and DDR4 by selling to people and companies for combination with  
11 computers to result in direct patent infringement despite Corsair expecting this  
12 result. Hence, Corsair is liable for inducing patent infringement.

- 13 19. On information and belief, Corsair did not warn its customers of the patent  
14 infringement if its memory products were incorporated into systems such as  
15 computers.

16 **COUNT TWO**

- 17 20. Corsair is a contributory infringer of at least claim 1 of the '315 Patent at the least  
18 with its memory products known in the industry as DDR2, DDR3 and DDR4 by  
19 knowing inducing people and companies purchasing the memory products to  
20 combine the memory products with computers result in direct patent infringement  
21 despite Corsair expecting this result.

- 22 21. On information and belief, Corsair did not warn its customers of the patent  
23 infringement if its products were incorporated into systems such as computers.  
24 Hence, Corsair is liable for contributory patent Infringement.

**JURY DEMAND**

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 Goodman on this Complaint;
- b. order that an accounting be had for the damages caused to the Plaintiff Goodman by the infringing activities of the Defendant Corsair;
- c. award Plaintiff Goodman interest and costs; and
- d. award Plaintiff Goodman such other and further relief as this Court may deem just and equitable.

THE PLAINTIFF  
JAMES B. GOODMAN

  
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