

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VISUAL MEMORY LLC,)	
)	
Plaintiff,)	
)	Civil Action No. _____
v.)	
)	JURY TRIAL DEMANDED
MARVELL SEMICONDUCTOR, INC.,)	
)	
Defendant.)	
_____)	

COMPLAINT

For its Complaint, Plaintiff Visual Memory LLC ("Visual Memory"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Visual Memory is a Delaware limited liability company with a place of business located in Dallas, Texas.
2. Defendant Marvell Semiconductor, Inc. is a California corporation with, upon information and belief, a place of business located in Marlborough, Massachusetts.

JURISDICTION AND VENUE

3. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
5. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) 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 this district.

6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b).

THE PATENTS-IN-SUIT

7. On August 5, 1997, United States Patent No. 5,654,932 (the "'932 patent"), entitled "Memory Devices With Selectable Access Type And Methods Using The Same," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '932 patent is attached hereto as Exhibit A.

8. On February 15, 2000, United States Patent No. 6,026,027 (the "'027 patent"), entitled "Flash Memory System Having Memory Cache," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '027 patent is attached hereto as Exhibit B.

9. Visual Memory is the assignee and owner of the right, title and interest in and to the '932 and '027 patents, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 5,654,932

10. Visual Memory repeats and realleges the allegations of paragraphs 1 through 9 as if fully set forth herein.

11. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of the '932 patent by making, using, importing, offering for sale, and/or selling systems and methods of performing different accesses during a single RAS cycle to a memory array of rows and columns of memory cells, including, but not limited to Marvell DragonFly Virtual Storage Accelerators, covered by one or more claims of the '932 patent.

12. Visual Memory is entitled to recover from Defendant the damages sustained by Visual Memory as a result of Defendant's infringement of the '932 patent in an amount subject to

proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 6,026,027

13. Visual Memory repeats and realleges the allegations of paragraphs 1 through 12 as if fully set forth herein.

14. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of the '027 patent by making, using, importing, offering for sale, and/or selling methods for implementing a flash memory device and for controlling the wear thereof, including, but not limited to Marvell DragonFly Virtual Storage Accelerators, covered by one or more claims of the '027 patent.

15. Visual Memory is entitled to recover from Defendant the damages sustained by Visual Memory as a result of Defendant's infringement of the '027 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

Visual Memory hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Visual Memory requests that this Court enter judgment against Defendant as follows:

- A. An adjudication that Defendant has infringed the '932 and '027 patents;
- B. An award of damages to be paid by Defendant adequate to compensate Visual Memory for Defendant's infringement of the '932 and '027 patents and any continuing or future

infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Visual Memory's reasonable attorneys' fees; and

D. An award to Visual Memory of such further relief at law or in equity as the Court deems just and proper.

Dated: May 8, 2015

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

Stamatios Stamoulis #4606
Richard C. Weinblatt #5080
Stamoulis & Weinblatt LLC
Two Fox Point Centre
6 Denny Road, Suite 307
Wilmington, DE 19809
Telephone: (302) 999-1540
Facsimile: (302) 762-1688
stamoulis@swdelaw.com
weinblatt@swdelaw.com

*Attorneys for Plaintiff
Visual Memory LLC*