IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TESSERA, INC. and INVENSAS CORPORATION, Plaintiffs, v. BROADCOM CORPORATION, Defendant.	)	Civil Action No. 16-379-LPS-CJB DEMAND FOR JURY TRIAL

AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Tessera, Inc. and Invensas Corporation (collectively "Tessera" or "Plaintiffs") bring this action for patent infringement against Defendant Broadcom Corporation and allege as follows:

THE PARTIES

1. Plaintiff Tessera, Inc. is a Delaware corporation with its principal place of business at 3025 Orchard Parkway, San Jose, California. Tessera, Inc. is a wholly-owned subsidiary of Tessera Technologies, Inc.

2. Plaintiff Invensas Corporation ("Invensas") is a Delaware corporation with its principal place of business at 3025 Orchard Parkway, San Jose, California. Invensas is a wholly-owned subsidiary of Tessera Intellectual Property Corporation which is a wholly-owned subsidiary of Tessera Technologies, Inc.

3. Defendant Broadcom Corporation is a California corporation with offices in Irvine, California.

JURISDICTION AND VENUE

4. This is an action for patent infringement under the patent laws of the United States of America, 35 U.S.C. §§ 1 *et seq.,* including 35 U.S.C. § 271. The Court has subject matter jurisdiction over the matters pleaded herein under 28 U.S.C. §§ 1331 and 1338(a).

5. The Court has personal jurisdiction over Broadcom because, on information and belief, Broadcom has regularly and systematically transacted business in this judicial district, directly or through intermediaries, and/or committed acts of infringement in this judicial district. Broadcom has also placed infringing products into the stream of commerce by shipping those products into this district or knowing that the products would be shipped into this district.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1400 and 1391(b) and (c) because, among other reasons, Broadcom is subject to personal jurisdiction in this district and has committed acts of infringement in this district, including selling and distributing infringing products in this district.

CLAIMS FOR PATENT INFRINGEMENT

Count I: Infringement of U.S. Patent No. 6,856,007

7. Tessera hereby incorporates the allegations of Paragraphs 1 through 6 as if fully set forth herein.

8. United States Patent No. 6,856,007 ("'007 Patent") is titled "High-Frequency Chip Packages." It issued on February 15, 2005, and names Michael Warner as the inventor. The '007 Patent issued from United States Patent Application No. 10/210,160, filed on August 1, 2002. It claims the benefit of Provisional Application No. 60/315,408, filed on August 28, 2001.

9. Tessera, Inc. is the sole owner by assignment of all right, title, and interest in the '007 Patent. A true and correct copy of the '007 Patent is attached as **Exhibit A.**

10. In non-technical terms, the ’007 Patent discloses and claims a compact and economical semiconductor chip assembly that includes a packaged semiconductor chip, a chip carrier with a metallic thermal conductor, and a circuit panel with a thermal conductor mounting. The claimed semiconductor chip assembly provides a low thermal resistance cooling path between the packaged chip and the circuit panel and can diminish (shield) undesired RF emissions to and from the chip. The claimed assembly is ideal for use with RF chips in wireless communications devices, which generate substantial amounts of heat, because it facilitates the transfer of heat away from the chip.

11. Tessera is informed and believes, and thereon alleges, that Broadcom has infringed, is currently infringing, and will infringe the ’007 Patent in violation of 35 U.S.C. § 271 by, among other things, making, using, selling, offering to sell, and/or importing within this district and elsewhere in the United States, without license or authority, products falling within the scope of one or more claims of the ’007 Patent, including at least Claim 18, literally and/or under the doctrine of equivalents.

12. Based on the information presently available to it, Tessera alleges that Broadcom’s BCM94360 PCI-E Mini Card devices, which include the BCM4360 5G WiFi 3-Stream 802.11ac Gigabit Transceiver, are exemplary devices that infringe at least Claim 18 of the ’007 Patent. Tessera also alleges that Broadcom’s BCM4331, BCM4360, and BCM43602 semiconductor devices are additional exemplary devices that infringe at least Claim 18 of the ’007 Patent when mounted to a circuit panel in the manner set forth in claim 18 of the ’007 Patent. The exemplary devices fall into different product families and series that span across different Broadcom product categories and include the following infringing Broadcom products:

- Broadcom's BCM94360 PCI-E Mini Card devices are part of a family of related mini card products and reference design kits that instruct Broadcom customers to create cards or boards. On information and belief, the infringing Broadcom products from this family include Broadcom's BCM94360 PCI-E Mini Card Series devices, other Broadcom mini cards and related reference designs, all Broadcom cards or boards that are the same or substantially similar to the Broadcom BCM94360 PCI-E Mini Card devices and related reference designs, and all products containing the same.
- Broadcom's BCM4331, BCM4360, and BCM43602 semiconductor devices are part of a multi-generation extended family of Broadcom WiFi 802.11 single chip, combination chip and system-on-a-chip semiconductor devices. On information and belief, the infringing products from this family include Broadcom's BCM4331, BCM4360, and BCM43602 semiconductor devices, other Broadcom WiFi 802.11 semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM4331, BCM4360, and BCM43602 or other Broadcom WiFi 802.11 semiconductor devices, and all products containing such Broadcom semiconductor devices when those semiconductor devices are mounted to a circuit panel in the manner set forth in claim 18 of the '007 Patent.

The infringing products identified in this paragraph, all Broadcom products that are substantially similar to these products, and products containing the same are referred to collectively as the "Infringing '007 Products." Tessera makes this preliminary identification of infringing products and infringed claims without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

13. On information and belief, Broadcom directly infringes and/or is inducing infringement of the ’007 Patent by making, using, offering to sell, selling, and/or importing the Infringing ’007 Products in this judicial district and elsewhere in the United States, and inducing others to make, use, offer to sell, sell, and/or import Infringing ’007 Products or products containing Infringing ’007 Products. The Infringing ’007 Products comprise a compact and economical infringing semiconductor chip assembly that includes a packaged semiconductor chip, a chip carrier with a metallic thermal conductor, and a circuit panel with a thermal conductor mounting. The infringing semiconductor chip assembly provides a low thermal resistance cooling path between the packaged chip and the circuit panel and can diminish (shield) undesired RF emissions to and from the chip. The infringing assembly is ideal for use in RF chips in wireless communications devices, which generate substantial amounts of heat, because it facilitates the transfer of heat away from the chip as disclosed in the ’007 Patent.

14. Broadcom has been aware of the ’007 Patent since no later than the date of this Complaint. Broadcom also has been aware that Broadcom customers, distributors and other purchasers of the Infringing ’007 Products are infringing the ’007 Patent as set forth in this Complaint.

15. Broadcom is knowingly and intentionally inducing infringement of the ’007 Patent, in violation of 35 U.S.C. § 271(b), by actively encouraging others to make, use, offer for sale, sell, and/or import within this judicial district and elsewhere in the United States, without license or authority, Infringing ’007 Products or products containing Infringing ’007 Products that directly infringe the ’007 Patent. For example, Broadcom markets, promotes and advertises its infringing semiconductor devices and offers product briefs and descriptions, press releases, data sheets, manuals, user guides, and other materials that actively encourage others to directly

infringe the ’007 patent by making, using, selling, offering to sell and/or importing products that contain Broadcom’s infringing semiconductor devices through its website (www.broadcom.com), at trade shows and conferences, and through its sales representatives, distributors and other channels that encourage and facilitate infringing use of Broadcom’s semiconductor devices by others. *See, e.g.*, **Exhibit B** (Broadcom User Guide and OEM Instructions for exemplary device). Since at least the date of this Complaint, Broadcom has had knowledge that the Infringing ’007 Products infringe the ’007 Patent and it has intended that Broadcom customers, distributors and other purchasers infringe the ’007 Patent by making, using, selling, offering to sell and/or importing Infringing ’007 Products or products containing the Infringing ’007 Products.

16. Broadcom’s acts of infringement have caused damage to Tessera in an amount yet to be determined and subject to proof at trial.

Count II: Infringement of U.S. Patent No. 6,849,946

17. Tessera hereby incorporates the allegations of Paragraphs 1 through 16 as if fully set forth herein.

18. United States Patent No. 6,849,946 (“’946 Patent”) is titled “Planarized Semiconductor Interconnect Topography and Method for Polishing a Metal Layer to Form Interconnect.” It issued on February 1, 2005, and names Anantha R. Sethuraman and Christopher A. Seams as the inventors. The ’946 Patent issued from United States Patent Application No. 09/779,123, filed on February 7, 2001. It is a continuation of Application No. 09/143,723, filed on August 31, 1998, now United States Patent No. 6,232,231.

19. Invensas Corporation is the sole owner by assignment of all right, title, and interest in the ’946 Patent. A true and correct copy of the ’946 Patent is attached as **Exhibit C.**

20. In non-technical terms, the ’946 Patent discloses and claims a semiconductor layout configuration and method that results in a more efficient planarization process for a semiconductor chip. During prior art chemical mechanical polishing (CMP) of a semiconductor chip layer, the surface layer may include relatively hard areas (dielectric) and relatively soft areas (metal interconnects) that polish at different rates. The CMP pad conforms to the surface being polished, and thus flexes in softer areas that polish more quickly, causing the surface of those soft areas to become recessed relative to the adjacent areas of the harder dielectric. This is known as the “dishing” problem. Similarly, relatively small oxide regions are removed by the CMP pad at a faster rate than large oxide regions, leading to a problem known as “oxide erosion.” The ’946 Patent solves the “dishing” and “oxide erosion” problems by disclosing the etching of laterally spaced dummy trenches in a dielectric layer between a wide metal interconnect and a series of narrow metal interconnects, and filling the dummy trenches with a conductive material (*e.g.*, metal). Advantageously, the polish rate of the conductive material above the dummy trenches and the wide and narrow trenches is substantially uniform, as is the polish rate of the oxide, resulting in a substantially planar surface.

21. Tessera is informed and believes, and thereon alleges, that Broadcom has infringed, is currently infringing, or will infringe the ’946 Patent in violation of 35 U.S.C. § 271 by, among other things, making, using, selling, offering to sell, and/or importing within this district and elsewhere in the United States, without license or authority, products falling within the scope of one or more claims of the ’946 Patent, including at least Claim 16 and other claims that depend from Claim 16, literally and/or under the doctrine of equivalents.

22. Based on the information presently available to it, Tessera alleges that Broadcom’s BCM3383, BCM4331, BCM4343, BCM4356, BCM43602, BCM4366, BCM4709,

BCM4752, BCM53125, BCM56850, and BCM7425 semiconductor devices are exemplary devices that infringe at least Claim 16 of the ’946 Patent and other claims that depend from Claim 16. The exemplary devices fall into different product families and series that span across different Broadcom product categories and include the following infringing Broadcom products:

- Broadcom’s BCM3383 semiconductor devices are part of Broadcom’s family of DOCSIS semiconductor devices. On information and belief, the infringing products from this family include Broadcom’s BCM3383 semiconductor devices, other Broadcom DOCSIS semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM3383 or other Broadcom DOCSIS semiconductor devices, and all products containing the same.
- Broadcom’s BCM4331, BCM4343, BCM4356, BCM43602 and BCM4366 semiconductor devices are part of a multi-generation extended family of Broadcom WiFi 802.11 single chip, combination chip and system-on-a-chip semiconductor devices. On information and belief, the infringing products from this family include Broadcom’s BCM4331, BCM4343, BCM4356, BCM43602 and BCM4366 semiconductor devices, other Broadcom WiFi 802.11 semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM4331, BCM4343, BCM4356, BCM43602, BCM4366, or other Broadcom WiFi 802.11 semiconductor devices, and all products containing the same.
- Broadcom’s BCM4709 semiconductor devices are part of a family of Broadcom communications processors targeted for switching control and management and residential routers/gateways. On information and belief, the infringing products from this family include Broadcom’s BCM4709 semiconductor devices, other Broadcom

communications processor semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM4709 or other Broadcom communication processor semiconductor devices, and all products containing the same.

- Broadcom's BCM4752 semiconductor devices are part of a multi-generation family of Global Navigation Satellite System ("GNSS") receivers. On information and belief, the infringing products from this family include Broadcom's BCM4752 semiconductor devices, other Broadcom GNSS receivers, all Broadcom semiconductor devices that are the same or substantially similar to the BCM4752 or other Broadcom GNSS semiconductor devices, and all products containing the same.
- Broadcom's BCM53125 semiconductor devices are part of a family of Broadcom Ethernet switches for consumer products, home, office and business use ("consumer/home/office/business"). On information and belief, the infringing products from this family include Broadcom's BCM53125 semiconductor devices, other Broadcom consumer/home/office/business Ethernet switch semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM53125 or other consumer/home/office/business Ethernet switch semiconductor devices, and all products containing the same.
- Broadcom's BCM56850 Series of semiconductor devices are Broadcom StrataXGS Trident II Ethernet Switches and they are part of a multi-generation extended family of Broadcom Ethernet switch semiconductor devices for data centers, service providers, and enterprise, medium and small businesses ("data center/service provider/enterprise/SMB"). On information and belief, the infringing products from

this family include Broadcom's BCM56850 Series semiconductor devices, other Broadcom data center/service provider/enterprise/SMB Ethernet switch semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM56850 Series or other Broadcom data center/service provider/enterprise/SMB Ethernet switch semiconductor devices, and all products containing the same.

- Broadcom's BCM7425 semiconductor devices are part of a multi-generation extended family of Broadcom semiconductor devices for high definition ("HD") and ultra-high definition ("UHD") customer premises equipment such as set-top boxes, satellite receivers, and gateways. On information and belief, the infringing products from this family include Broadcom's BCM7425 semiconductor devices, other Broadcom HD and UHD semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM7425 or other Broadcom HD and UHD semiconductor devices, and all products containing the same.

The infringing products identified in this paragraph, all Broadcom products that are substantially similar to these products, and products containing the same are referred to collectively as the "Infringing '946 Products." Tessera makes this preliminary identification of infringing products and infringed claims without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

23. On information and belief, Broadcom directly infringes, and is inducing infringement of, the '946 Patent by making, using, offering to sell, selling, and/or importing the Infringing '946 Products in this judicial district and elsewhere in the United States and inducing

others to make, use, offer to sell, sell, and/or import Infringing ’946 Products or products containing Infringing ’946 Products. The Infringing ’946 Products comprise a semiconductor layout configuration and method that results in a more efficient polishing process. Specifically, the Infringing ‘946 Products include etched laterally-spaced dummy trenches in a dielectric layer between a wide metal interconnect and a series of narrow metal interconnects for these products and fills the dummy trenches with a conductive material (metal) as indicated by the ’946 Patent. The polish rate of the conductive material and oxide above the dummy trenches and the wide and narrow trenches is substantially uniform, as is the polish rate of the oxide, for the Infringing ’946 Products, resulting in a substantially planar surface.

24. Broadcom has been aware of the ’946 Patent since no later than the date of this Complaint. Broadcom also has been aware that Broadcom customers, distributors and other purchasers of the Infringing ’946 Products are infringing the ’946 Patent as set forth in this Complaint.

25. Broadcom is knowingly and intentionally inducing infringement of the ’946 Patent, in violation of 35 U.S.C. § 271(b), by actively encouraging others to make, use, offer for sale, sell, and/or import within this judicial district and elsewhere in the United States, without license or authority, Infringing ’946 Products or products containing Infringing ’946 Products that directly infringe the ’946 Patent. For example, Broadcom markets, promotes and advertises its infringing semiconductor devices and offers product briefs and descriptions, press releases, data sheets, manuals, user guides, and other materials that actively encourage others to directly infringe the ’946 patent by making, using, selling, offering to sell and/or importing products that contain Broadcom’s infringing semiconductor devices through its website (www.broadcom.com), at trade shows and conferences, and through its sales representatives,

distributors and other channels that encourage and facilitate infringing use of Broadcom's semiconductor devices by others. *See, e.g.,* **Exhibit D** (Broadcom product pages, press releases and other information about exemplary devices). Since at least the date of this Complaint, Broadcom has had knowledge that the Infringing '946 Products infringe the '946 Patent and it has intended that Broadcom customers, distributors and other purchasers infringe the '946 Patent by making, using, selling, offering to sell and/or importing Infringing '946 Products or products containing the Infringing '946 Products.

26. Broadcom's acts of infringement have caused damage to Tessera in an amount yet to be determined and subject to proof at trial.

Count III: Infringement of U.S. Patent No. 6,133,136

27. Tessera hereby incorporates the allegations of Paragraphs 1 through 26 as if fully set forth herein.

28. United States Patent No. 6,133,136 ("'136 Patent") is titled "Robust Interconnect Structure." It issued on October 17, 2000, and names Daniel Charles Edelstein, Vincent McGahay, Henry A. Nye, III, Brian George Reid Ottey, and William H. Price as the inventors. The '136 Patent issued from United States Patent Application No. 09/314,003, filed on May 19, 1999. On August 2, 2016, the United States Patent and Trademark Office issued a Certificate of Correction for the '136 Patent.

29. Invensas Corporation is the sole owner by assignment of all right, title, and interest in the '136 Patent. A true and correct copy of the '136 Patent including the Certificate of Correction is attached as **Exhibit E.**

30. In non-technical terms, the '136 Patent discloses and claims a structure for metal interconnects used in semiconductor packaging. Copper is increasingly used as an interconnect in semiconductor devices because it has lower resistivity and a reduced susceptibility to

electromigration as compared to traditional aluminum or aluminum alloy interconnects. However, copper has a tendency to diffuse into surrounding dielectric materials, which reduces the structural integrity of the devices. The ’136 Patent discloses and claims a structure that improves the structural integrity of copper interconnects. The claimed structure comprises a layer of copper, a barrier layer, a layer of aluminum copper (AlCu), and a pad-limiting layer. The layer of AlCu and the barrier layer are interposed between the layer of copper and the pad-limiting layer. The barrier layer is located between the layer of copper and the layer of AlCu. The ’136 Patent discloses that the barrier layer is typically titanium, titanium nitride, tantalum or tantalum nitride, or alloys thereof. The pad-limiting layer is typically titanium nitride, copper, gold, titanium tungsten, chromium or a combination of such materials.

31. Tessera is informed and believes, and thereon alleges, that Broadcom has infringed, is currently infringing, or will infringe the ’136 Patent in violation of 35 U.S.C. § 271 by, among other things, making, using, selling, offering to sell, and/or importing within this district and elsewhere in the United States, without license or authority, products falling within the scope of one or more claims of the ’136 Patent, including at least Claims 1 and 11, claims that depend from Claims 1 and 11, including corrected claims 33 and 34, literally and/or under the doctrine of equivalents.

32. Based on the information presently available to it, Tessera alleges that Broadcom’s BCM3383, BCM33843, BCM43570, BCM4709, BCM56850, BCM7425, and BCM7435 semiconductor devices are exemplary devices that infringe at least Claims 1 and 11 of the ’136 Patent and other claims that depend from Claims 1 and 11, including corrected claims 33 and 34. The exemplary devices fall into different product families and series that span across different Broadcom product categories and include the following infringing Broadcom products:

- Broadcom's BCM3383 and BCM33843 semiconductor devices are part of Broadcom's family of DOCSIS semiconductor devices. On information and belief, the infringing products from this family include Broadcom's BCM3383 and BCM33843 semiconductor devices, other Broadcom DOCSIS semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM3383, BCM33843, or other Broadcom DOCSIS semiconductor devices, and all products containing the same.
- Broadcom's BCM43570 semiconductor devices are part of a multi-generation extended family of WiFi 802.11 single chip, combination chip and system-on-a-chip semiconductor devices. On information and belief, the infringing products from this family include Broadcom's BCM43570 semiconductor devices, other Broadcom WiFi 802.11 semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM43570 or other Broadcom WiFi 802.11 semiconductor devices, and all products containing the same.
- Broadcom's BCM4709 semiconductor devices are part of a family of Broadcom communications processors targeted for switching control and management and residential routers/gateways. On information and belief, the infringing products from this family include Broadcom's BCM4709 semiconductor devices, other Broadcom communications processor semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM4709 or other Broadcom communication processor semiconductor devices, and all products containing the same.

- Broadcom's BCM56850 Series of semiconductor devices are Broadcom StrataXGS Trident II Ethernet Switches and they are part of a multi-generation extended family of Broadcom Ethernet switch semiconductor devices for data centers, service providers, and enterprise, medium and small businesses ("data center/service provider/enterprise/SMB"). On information and belief, the infringing products from this family include Broadcom's BCM56850 Series semiconductor devices, other Broadcom data center/service provider/enterprise/SMB Ethernet switch semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM56850 Series or other Broadcom data center/service provider/enterprise/SMB Ethernet switch semiconductor devices, and all products containing the same.
- Broadcom's BCM7425 and BCM7435 semiconductor devices are part of a multi-generation extended family of Broadcom semiconductor devices for high definition ("HD") and ultra-high definition ("UHD") customer premises equipment such as set-top boxes, satellite receivers and gateways. On information and belief, the infringing products from this family include Broadcom's BCM7425 and BCM7435 semiconductor devices, other Broadcom HD and UHD semiconductor devices, all Broadcom semiconductor devices that are the same or substantially similar to the BCM7425, BCM7435, or other Broadcom HD and UHD semiconductor devices, and all products containing the same.

The infringing products identified in this paragraph, all Broadcom products that are substantially similar to these products, and products containing the same are referred to collectively as the "Infringing '136 Products." Tessera makes this preliminary identification of infringing products

and infringed claims without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identifications based on additional information obtained through discovery or otherwise.

33. On information and belief, Broadcom directly infringes and/or is inducing infringement of the ’136 Patent by making, using, offering to sell, selling, and/or importing the Infringing ’136 Products in this judicial district and elsewhere in the United States, and inducing others to make, use, offer to sell, sell, and/or import Infringing ’136 Products or products containing Infringing ’136 Products. The Infringing ’136 Products comprise a structure that results in improved structural integrity of copper interconnects. Specifically, the Infringing ’136 Products use a structure comprised of a layer of copper, a barrier layer, a layer of aluminum copper (AlCu) and a pad-limiting layer where the layer of AlCu and the barrier layer are interposed between the layer of copper and the pad-limiting layer and the barrier layer is located between the layer of copper and the layer of AlCu, resulting in improved structural integrity of copper interconnects.

34. Broadcom has been aware of the ’136 Patent since no later than the date of the original Complaint, and has been aware of corrected claims 33 and 34 no later than the date of this Amended Complaint. Broadcom also has been aware that Broadcom customers, distributors and other purchasers of the Infringing ’136 Products are infringing the ’136 Patent as set forth in the original Complaint and this Amended Complaint.

35. Broadcom is knowingly and intentionally inducing infringement of the ’136 Patent, in violation of 35 U.S.C. § 271(b), by actively encouraging others to make, use, offer for sale, sell, and/or import within this judicial district and elsewhere in the United States, without license or authority, Infringing ’136 Products or products containing Infringing ’136 Products

that directly infringe the ’136 Patent. For example, Broadcom markets, promotes and advertises its infringing semiconductor devices and offers product briefs and descriptions, press releases, data sheets, manuals, user guides, and other materials that actively encourage others to directly infringe the ’136 patent by making, using, selling, offering to sell and/or importing products that contain Broadcom’s infringing semiconductor devices through its website (www.broadcom.com), at trade shows and conferences, and through its sales representatives, distributors and other channels that encourage and facilitate infringing use of Broadcom’s semiconductor devices by others. *See, e.g.*, **Exhibit F** (Broadcom product pages, press releases and other information about exemplary devices). Since at least the date of the original Complaint, Broadcom has had knowledge that the Infringing ’136 Products infringe the ’136 Patent and it has intended that Broadcom customers, distributors and other purchasers infringe the ’136 Patent by making, using, selling, offering to sell and/or importing Infringing ’136 Products or products containing the Infringing ’136 Products. Since at least the date of this Amended Complaint, Broadcom has had knowledge that the Infringing ’136 Products infringe corrected claims 33 and 34 of the ’136 Patent and it has intended that Broadcom customers, distributors and other purchasers infringe the ’136 Patent by making, using, selling, offering to sell and/or importing Infringing ’136 Products or products containing the Infringing ’136 Products.

36. Broadcom’s acts of infringement have caused damage to Tessera in an amount yet to be determined and subject to proof at trial.

PRAYER FOR RELIEF

WHEREFORE, Tessera prays for relief as follows:

A. Judgment that Broadcom has directly infringed the ’007, ’946, and ’136 Patents, both literally and under the doctrine of equivalents;

B. Judgment that Broadcom has induced the infringement of the '007, '946, and '136 Patents;

C. Compensatory damages in an amount according to proof, and in any event no less than a reasonable royalty;

D. An award of reasonable attorneys' fees, costs, and expenses pursuant to 35 U.S.C. § 285 because this is an exceptional case;

E. Prejudgment interest on all damages awarded to Tessera;

F. Post-judgment interest on all sums awarded to Tessera from the date of the judgment;

G. Costs of suit incurred herein; and

H. Any and all other relief that the Court deems just and equitable.

DEMAND FOR JURY TRIAL

Tessera hereby demands a trial by jury on all issues.

Dated: August __, 2016

Respectfully submitted,

FARNAN LLP

/s/ Brian Farnan

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