UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

TELEPUTERS, LLC,
 	
        Plaintiff
 	
    v.
 	
ARM, INC.,
 	
        Defendant
	Case No. 6:23-cv-00874
	
	JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Teleputers, LLC ("Plaintiff" or "Teleputers") hereby files this Original Complaint for Patent Infringement against Defendant ARM, Inc. ("Defendant" or "ARM"), and alleges, on information and belief, as follows:

THE PARTIES

1.   Teleputers, LLC is a limited liability company organized and existing under the laws of the State of New Jersey with its principal place of business in Princeton, New Jersey.

2.   On information and belief, ARM, Inc. is a corporation organized under the laws of Delaware with a principle place of business in this District at 5707 Southwest Pkwy #100, Austin, Texas 78735.

JURISDICTION AND VENUE

3.   This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq*. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

4.   Defendant has committed acts of infringement in this judicial district.

5.   On information and belief, Defendant maintains regular and systematic business interests in this district and throughout the State of Texas including through their representatives, employees and physical facilities.

6.   On information and belief, the Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in the State of Texas, has conducted business in the State of Texas, and/or has engaged in continuous and systematic activities in the State of Texas. On information and belief, Defendant's accused instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the Western District of Texas.

7.   On information and belief, Defendant voluntarily conducts business and solicits customers in the State of Texas and within this District, including, but not limited to, its offices located at 5707 Southwest Pkwy #100, Austin, Texas 78735.

8.   On information and belief, Defendant generate substantial revenue within this District and from the acts of infringement as carried out in this District. As such, the exercise of jurisdiction over Defendant would not offend the traditional notions of fair play and substantial justice.

9.   Venue is proper in the Western District of Texas pursuant to 28 U.S.C. § 1400(b) and 28 U.S.C. § 1391(c)(3).

NOTICE OF TELEPUTERS' PATENTS

10.   Teleputers is owner by assignment of U.S. Patent No. 6,922,472 ("the '472 Patent") entitled "Method and system for performing permutations using permutation instructions based on butterfly networks." A copy may be obtained at:

https://patents.google.com/patent/US6922472B2/en.

11.   Teleputers is owner by assignment of U.S. Patent No. 6,952,478B2 ("the '478 Patent") entitled "Method and system for performing permutations using permutation instructions based on modified omega and flip stages." A copy may be obtained at:

https://patents.google.com/patent/US6952478B2/en.

12.   Teleputers is owner by assignment of U.S. Patent No. 7,092,526B2 ("the '526 Patent" and collectively with the '478 Patent, "the Patents-in-Suit") entitled "Method and system for performing subword permutation instructions for use in two-dimensional multimedia processing." A copy may be obtained at: https://patents.google.com/patent/US7092526B2/en.

13.   Teleputers is owner by assignment of U.S. Patent No. 7,174,014B2 ("the '014 Patent") entitled "Method and system for performing permutations with bit permutation instructions." A copy may be obtained at: https://patents.google.com/patent/US7174014B2/en.

Teleputers is owner by assignment of U.S. Patent No. 7,519,795B2 ("the '795 Patent") entitled "Method and system for performing permutations with bit permutation instructions." A copy may be obtained at: https://patents.google.com/patent/US7519795B2/en.

14.   The foregoing Patents, namely the '014 Patent, the '526 Patent, the '478 Patent, the '472 Patent, and the '795 Patent are collectively referred to as "the Teleputers Patents."

15.   The Teleputers Patents are valid, enforceable, and were duly issued in full compliance with Title 35 of the United States Code.

16.   Defendant, at least by the date of this Original Complaint, is on notice of the Teleputers Patents.

DEFENDANT'S PRODUCTS

17.   On information and belief, Defendant makes, uses, imports, sells, and/or offers for sale a multitude of products and services as systems on chips ("SoC") that employ Arm Neon

technology supporting the infringing instructions including, but not limited to: (1) the 88PA6270 SoC; (2) the 88PA6220 SoC; (3) the PXA1088 SoC; (4) the ARMADA 38x; and (5) the ThunderX3. (individually and collectively, the "Accused Instrumentalities"). On information and belief, the Accused Instrumentalities are made, used, sold, offered for sale, and/or imported in the United States by Defendant.

COUNT I
(Infringement of U.S. Patent No. 6,952,478B2)

18.   Teleputers incorporates the above paragraphs by reference.

19.   Defendant has been on notice of the '478 Patent at least as early as the date it received service of this Original Complaint.

20.   On information and belief, Defendant has directly infringed and continues to infringe at least Claim 1 of the '478 Patent by making, using, importing, selling, and/or, offering for sale the Accused Instrumentalities in the United States.

21.   On information and belief, Defendant, with knowledge of the '478 Patent, indirectly infringes the '478 Patent by inducing others to infringe the '478 Patent. In particular, Defendant intends to induce customers to infringe the '478 Patent by encouraging customers to use the Accused Instrumentalities in a manner that results in infringement.

22.   On information and belief, Defendant also induces others, including its customers, to infringe the '478 Patent by providing technical support for the use of the Accused Instrumentalities.

23.   On information and belief, the Accused Instrumentalities necessarily infringe one or more claims of the '478 Patent when used as intended.

24.   On information and belief, the Accused Instrumentalities infringe at least Claim 1 of the '478 Patent by providing a method for permuting a two-dimensional (2D) data based on decomposing images and objects into atomic elements.

25.   Teleputers has been damaged by Defendant's infringement of the '478 Patent.

COUNT II
(Infringement of U.S. Patent No. 7,092,526B2)

26.   Teleputers incorporates the above paragraphs by reference.

27.   Defendant has been on notice of the '014 Patent at least as early as the date it received service of this Original Complaint.

28.   On information and belief, Defendant has infringed and continues to infringe at least Claim 1 of the '526 Patent by making, using, importing, selling, and/or, offering for sale the Accused Instrumentalities in the United States.

29.   On information and belief, Defendant, with knowledge of the '526 Patent, indirectly infringes the '014 Patent by inducing others to infringe the '526 Patent. In particular, Defendant intends to induce customers to infringe the '526 Patent by encouraging customers to use the Accused Instrumentalities in a manner that results in infringement.

30.   On information and belief, Defendant also induces others, including customers, to infringe the '526 Patent by providing technical support for the use of the Accused Instrumentalities.

31.   On information and belief, the Accused Instrumentalities necessarily infringe one or more claims of the '526 Patent when used as intended.

32.   On information and belief, the Accused Instrumentalities infringe and induce others to infringe at least Claim 1 of the '526 Patent by providing a method for performing an arbitrary permutation of a source sequence of bits by defining an intermediate sequence of bits. For

example, using a permutation instruction, the source sequence of bits are transformed into intermediate sequence of bits. This is repeated using the intermediate sequence of bits as source sequence of bits until a desired sequence of bits is obtained and the permutation instructions form a sequence of instructions.

PRAYER FOR RELIEF

WHEREFORE, Teleputers respectfully requests the Court enter judgment against Defendant:

1.   declaring that the Defendant have infringed each of the Patents-in-Suit;

2.   awarding Teleputers its damages suffered as a result of Defendant's infringement of the Patents-in-Suit;

3.   awarding Teleputers its costs, attorneys' fees, expenses, and interest;

4.   awarding Teleputers ongoing post-trial royalties; and

5.   granting Teleputers such further relief as the Court finds appropriate.

JURY DEMAND

Teleputers demands trial by jury, under Fed. R. Civ. P. 38.

 Dated: December 21, 2023   Respectfully Submitted

                                                        */s/ Raymond W. Mort, III*_____
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                                                        **ATTORNEYS FOR PLAINTIFF
                                                        TELEPUTERS LLC**