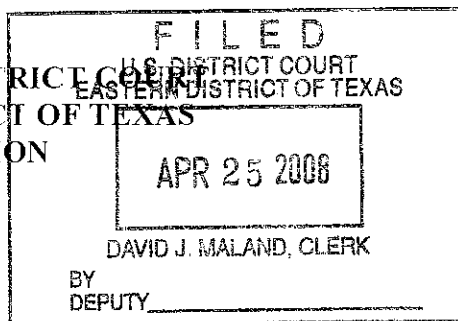


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION



(1) TECHNOLOGY PROPERTIES LIMITED and
(2) MCM PORTFOLIO, LLC,

Plaintiffs,

vs.

ASUSTeK COMPUTER, INC.,

Defendant.

CASE NO. 2-08 CV-175

Jury Trial Demanded

TJW/KE

COMPLAINT FOR PATENT INFRINGEMENT AND DEMAND FOR JURY TRIAL

Plaintiffs, Technology Properties Limited (“TPL”) and MCM Portfolio, LLC (“MCM”), (collectively “Plaintiffs”), allege the following in support of their Complaint for Patent Infringement and Demand for Jury Trial (“Complaint”) against Defendant ASUSTeK Computer, Inc. (“ASUSTeK”).

PARTIES

1. Plaintiff, Technology Properties Limited (“TPL”) is a corporation duly organized and existing under the laws of the State of California and maintains its principal place of business in Cupertino, California.

2. Plaintiff, MCM Portfolio, LLC (“MCM”) is a Limited Liability Company with its principal place of business in Cupertino, California.

3. Upon information and belief, Defendant ASUSTeK Computer, Inc. is a Taiwan corporation with its principal place of business in Taipei, Taiwan, R.O.C.

JURISDICTION

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1338(a) because this action arises under the patent laws of the United States, including 35 U.S.C. §§ 101, *et seq.* and 271, *et seq.* This Court has personal jurisdiction over Defendant because it infringes Plaintiffs' patents by offering on its website infringing products to its users and/or customers who reside in, or may be found in, the Eastern District of Texas. Further, Defendant has actually transacted business with users of its websites in the Eastern District of Texas

VENUE

5. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and 1400(b) because Defendant resides in this district, has committed acts of infringement in this district and, through its websites, has a regular and established place of business in this district.

GENERAL ALLEGATIONS

6 On November 13, 2007, United States Patent No. 7,295,443 ('443 Patent') entitled "Smartconnect Universal Flash Media Card Adapters" was duly and legally issued. MCM is the owner of the '443 Patent. TPL is the exclusive licensee of the '443 Patent. TPL has the sole and exclusive right and obligation to license and enforce the '443 Patent. A true and correct copy of the '443 Patent is attached hereto as Exhibit A.

7 On January 9, 2007, United States Patent No. 7,162,549 ('549 Patent') entitled "Multimode Controller for Intelligent and "Dumb" Flash Cards" was duly and legally issued. MCM is the owner of the '549 Patent. TPL is the exclusive licensee of the '549 Patent. TPL has the sole and exclusive right and obligation to license and enforce the '549 Patent. A true and correct copy of the '549 Patent is attached hereto as Exhibit B.

COUNT 1

(Patent Infringement Against ASUSTeK Computer, Inc)

8. Paragraphs 1-7 of the Complaint set forth above are incorporated herein by reference.

9. Upon information and belief Defendant ASUSTeK has infringed and continues to infringe under 35 U.S.C. § 271 the '443 Patent and the '549 Patent (collectively "the patents-in-suit).

10 ASUSTeK's acts of infringement have caused damage to Plaintiffs Under 35 U.S.C. § 284, Plaintiffs are entitled to recover from ASUSTeK the damages sustained by Plaintiffs as a result of ASUSTeK's infringement of the patents-in-suit ASUSTeK's infringement of Plaintiffs' exclusive rights under the patents-in-suit will continue to damage Plaintiffs' business, causing irreparable harm, for which there is no adequate remedy at law, unless enjoined by this Court under 35 U.S.C. § 283

11 Plaintiffs allege, on information and belief, that ASUSTeK's acts of infringement were willful and deliberate.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendant as follows:

A. For judgment that Defendant ASUSTeK Computer, Inc. has infringed and continues to infringe the patents-in-suit;

B For permanent injunctions under 35 U.S.C. § 283 against Defendant and its directors, officers, employees, agents, subsidiaries, parents, attorneys, and all persons acting in concert, on behalf of, in joint venture, or in partnership with Defendant from further acts of

infringement;

C For damages to be paid by Defendant adequate to compensate Plaintiffs for its infringement, including interests, costs and disbursements as the Court may deem appropriate under 35 U.S.C. § 284;

D. For judgment finding that Defendant's infringement was willful and deliberate, entitling Plaintiffs to increased damages under 35 U.S.C. § 284;

E. For judgment finding this to be an exceptional case against Defendant and awarding Plaintiffs attorney fees under 35 U.S.C. § 285; and,

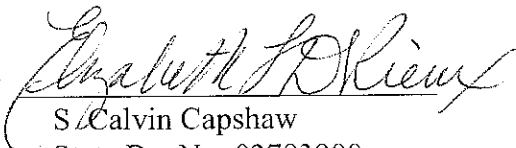
F For such other and further relief at law and in equity as the court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to the Federal Rules of Civil Procedure Rule 38, Plaintiffs hereby demand a jury trial on all issues triable by jury.

Dated: April 25, 2008

Respectfully submitted,

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