



Cadence may be served with process by serving its registered agent, CT Corp System at 350 N. St. Paul Street, Dallas, TX 75201.

3. Magma, on information and belief, is a corporation organized under the laws of the State of Delaware. Magma is doing business in Texas, and, on information and belief, has a principal place of business at 5460 Bayfront Plaza, Santa Clara, CA 95054. Magma may be served with process by serving its registered agent, Corporation Service Company, d/b/a CSC-Lawyers Incorporating Service Company at 701 Brazos Street Suite 1050, Austin, TX 78701.
4. Dynalith, on information and belief, is a corporation organized under the laws of the State of California. Dynalith is doing business in Texas, and, on information and belief, has a principal place of business at 688 Prada Dr., Milipitas, CA 95035. Dynalith may be served with process by serving its registered agent, Young Hur at 688 Prada Drive, Milpitas, CA 95035.
5. Altera, on information and belief, is a corporation organized under the laws of the State of Delaware. Altera is doing business in Texas, and, on information and belief, has a principal place of business at 101 Innovation Drive, San Jose, CA 95134-1941. Altera may be served with process by serving its registered agent, Corporation Service Company, d/b/a CSC-Lawyers Incorporating Service Company at 701 Brazos Street Suite 1050, Austin, TX 78701.
6. Mentor, on information and belief, is a corporation organized under the laws of the State of Oregon. Mentor is doing business in Texas, and, on information and belief, has a principal place of business at 8005 SW Boeckman Road, Wilsonville, OR 97070. Mentor may be

served with process by serving its registered agent, CT Corp System at 350 N. St. Paul Street, Dallas, TX 75201.

7. Aldec, on information and belief, is a corporation organized under the laws of the State of Delaware. Aldec is doing business in Texas, and, on information and belief, has a principal place of business at 2260 Corporate Circle, Henderson, NV 89074. Aldec may be served with process by serving its registered agent, Corporation Service Bureau Inc., at 3500 South Dupont Highway, Dover, DE 19901.

### **JURISDICTION & VENUE**

8. This is an action for infringement of a United States patent. Accordingly, this action arises under the patent laws of the United States of America, 35 U.S.C. § 1 et. seq. and jurisdiction is properly based on Title 35 United States Code, particularly § 271, and title 28 United States Code, particularly § 1338(a).
9. Cadence, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 5,663,900, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
10. Magma, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 5,663,900, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
11. Dynalith, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United

States Patent No. 5,663,900, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.

12. Altera, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 5,663,900, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
13. Mentor, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 5,663,900, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
14. Aldec, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 5,663,900, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
15. Venue is proper in this court under Title 28 United States Code § 1391(b) and 1400(b).

#### **PATENT INFRINGEMENT COUNT**

16. On September 2, 1997, United States Patent No. 5,663,900 (“the ‘900 patent”) entitled “Electronic Simulation and Emulation System” was duly and legally issued. A true and correct copy of the ‘900 patent is attached as Exhibit A.
17. Pursuant to 35 U.S.C. § 282, the above-listed United States Patents are presumed valid.
18. Bhandari is the owner and inventor of the ‘900 patent.
19. Cadence, on information and belief, manufactures, uses, and sells products that infringe the ‘900 patent. Cadence’s products incorporate the electronic simulation and emulation

technology which infringes at least claim 1 of the '900 patent, including for example and without limitation Cadence's Incisive Palladium and Incisive Xtreme Series, as well as any other devices or programs acting or capable of acting in the manner described and claimed in the '900 patent.

20. Magma, on information and belief, manufactures, uses, and sells products that infringe the '900 patent. Magma's products incorporate the electronic simulation and emulation technology which infringes at least claim 1 of the '900 patent, including for example and without limitation Magma's FineSIM, as well as any other devices or programs acting or capable of acting in the manner described and claimed in the '900 patent.
21. Dyalith, on information and belief, manufactures, uses, and sells products that infringe the '900 patent. Dyalith's products incorporate the electronic simulation and emulation technology which infringes at least claim 1 of the '900 patent, including for example and without limitation Dyalith's Physical Modeler, as well as any other devices or programs acting or capable of acting in the manner described and claimed in the '900 patent.
22. Altera, on information and belief, manufactures, uses, and sells products that infringe the '900 patent. Altera's products incorporate the electronic simulation and emulation technology which infringes at least claim 1 of the '900 patent, including for example and without limitation Altera's Nios II as well as any other devices or programs acting or capable of acting in the manner described and claimed in the '900 patent.
23. Mentor, on information and belief, manufactures, uses, and sells products that infringe the '900 patent. Mentor's products incorporate the electronic simulation and emulation technology which infringes at least claim 1 of the '900 patent, including for example and

without limitation Mentor's Seamless and Seamless FPGA, as well as any other devices or programs acting or capable of acting in the manner described and claimed in the '900 patent.

24. Aldec, on information and belief, manufactures, uses, and sells products that infringe the '900 patent. Aldec's products incorporate the electronic simulation and emulation technology which infringes at least claim 1 of the '900 patent, including for example and without limitation Aldec's HES platform as well as any other devices or programs acting or capable of acting in the manner described and claimed in the '900 patent.
25. The Defendants' infringement of the '900 patent alleged above has injured Bhandari and thus, it is entitled to recover damages adequate to compensate for the Defendants' infringement, which in no event can be less than a reasonable royalty.

#### **DEMAND FOR JURY TRIAL**

26. Bhandari hereby demands a jury trial on all claims and issues triable of right by a jury.

#### **PRAYER FOR RELIEF**

Wherefore, Bhandari prays for entry of judgment:

- A. that Defendants, Cadence, Magma, Dynalith, Altera, Mentor, and Aldec have infringed one or more claims of the '900 patent;
- B. that Defendants, Cadence, Magma, Dynalith, Altera, Mentor, and Aldec account for and pay to Bhandari all damages caused by the infringement of the '900 patent, which by statute can be no less than a reasonable royalty;
- C. that Bhandari be granted pre-judgment and post-judgment interest on the damages caused to them by reason of Defendants, Cadence, Magma, Dynalith, Altera, Mentor, and Aldec's infringement of the '900 patent;
- D. that Bhandari be granted its attorneys' fees in this action;

- E. that costs be awarded to Bhandari;
- F. that Bhandari be granted such other and further relief as the Court may deem just and proper under the current circumstances.

Respectfully submitted,

Date: 11/08/2006

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