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**FILED**  
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★ JUN 20 2011 ★

BROOKLYN OFFICE

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF NEW YORK**

**CV 11 - 2982**  
Case No.

12 JAMES B. GOODMAN,

13 Plaintiff,

14 vs.

15 CHIPLUS SEMICONDUCTOR CORP.

16 and

17 PREMIER COMPONENTS, INC.

18 Defendants.  
\*\*\*\*\*

**COMPLAINT FOR PATENT  
INFRINGEMENT AND DEMAND FOR  
JURY TRIAL**  
**FEUERSTEIN, J.**

**TOMLINSON, M.J.**

19  
20 NOW COMES Plaintiff, JAMES B. GOODMAN ("Goodman"), through his attorney,  
21 and files this Complaint for Patent Infringement and Demand for Jury Trial against Chiplus  
22 Semiconductor Corp. and Premier Components, Inc.

23 **PARTIES**

- 24 1. Plaintiff Goodman is an individual residing in the State of Texas.  
25 2. On information and belief, Chiplus Semiconductor Corp. ( hereinafter, "Chiplus")  
26 has a corporate office at 4F, No. 15, Industry East Road, 300 Republic of China,  
27 and a general agent in the USA at Premier Component, Inc., 1490 William Floyd  
28 Parkway, Suite 101, East Yaphank, NY 11967.

1 3. On information and belief, Premier Components, Inc. (hereinafter, "Premier") has  
2 an office at 1490 William Floyd Parkway, Suite 101, East Yaphank, NY 11967.

3 **JURISDICTION AND VENUE**

4 4. This is an action for patent infringement of United States Patent No. 6,243,315  
5 (hereinafter "The '315 Patent") pursuant to the laws of the United States of  
6 America as set forth in Title 35 Sections 271 and 281 of the United States Code.  
7 This court has subject matter jurisdiction over this action pursuant to 28 U.S.C.  
8 Sec. 1338(a) and 28 U.S.C. Sec. 1331. Venue is proper in this judicial district  
9 under 28 U.S.C. §§ 1391(b), (c) and 1400(b).

10 5. On information and belief, the Defendants are subject to this Court's specific and  
11 general personal jurisdiction, pursuant to due process and/or the New York Long  
12 Arm Statute, due to at least their respective business presence in this forum,  
13 including the infringement alleged herein.

14 6. On information and belief, the Defendants, directly and/or through intermediaries,  
15 advertise at least through respective web sites, offered to sell, sold and/or  
16 distributed infringing products, and/or have induced the sale and use of infringing  
17 products. In addition, and on information and belief, Defendants are subject to the  
18 Court's general jurisdiction, including from regularly doing or soliciting business,  
19 engaging in other persistent courses of conduct, and/or deriving substantial  
20 revenue from goods and services provided to individuals in California.

21 7. Venue is proper in this district because on information and belief, each Defendant  
22 has committed at least a portion of the infringements at issue in this case, and has  
23 a corporate presence in this forum.

24 8. Without limitation, on information and belief, within this district Defendants,  
25 directly and/or through intermediaries, have advertised at least through website,  
26 offered to sell and/or distributed infringing products, an/or have induced the sale  
27 and use of infringing products.

**CAUSES OF ACTION FOR PATENT INFRINGEMENT**

9. On June 5, 2001, the '315 Patent entitled "COMPUTER MEMORY SYSTEM WITH A LOW POWER MODE", was duly and legally issued to James B. Goodman, as the sole patentee.

10. Plaintiff Goodman is the sole owner of the '315 Patent, and has standing to bring this action.

**COUNT ONE**

11. Plaintiff Goodman repeats and incorporates herein the allegations contained in paragraphs 1 through 10 above.

12. Defendant Chiplus is infringing at least claim 1 of the '315 Patent at the least with its products known in the industry as "Pseudo SRAM" or "psram".

13. Defendant Premier is infringing at least claim 1 of the '315 Patent at least with its products called "Pseudo SRAM" or "psram".

**JURY DEMAND**

14. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues in this lawsuit.

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests this Court to:

- a. enter judgment for Plaintiff on this Complaint;
- b. order that an accounting be had for the damages caused to the Plaintiff by the infringing activities of the Defendants;
- c. award Plaintiff interest and costs; and
- d. award Plaintiff such other and further relief as this Court may deem just and equitable.

THE PLAINTIFF  
JAMES B. GOODMAN

Date: June 20, 2011

  
David Fink