

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

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INTRAVISUAL INC.,

Plaintiff,

v.

Civil Case No. 2:10-cv-90-TJW

FUJITSU LIMITED; FUJITSU  
MICROELECTRONICS AMERICA, INC.;  
MARVELL SEMICONDUCTOR, INC.;  
MARVELL TECHNOLOGY GROUP  
LIMITED; NEC ELECTRONICS AMERICA,  
INC.; NEC ELECTRONICS CORPORATION;  
NVIDIA CORPORATION; NXP B.V.;  
NXP SEMICONDUCTORS USA, INC.;  
PANASONIC CORPORATION; PANASONIC  
CORPORATION OF NORTH AMERICA;  
QUALCOMM INC.; RENESAS  
ELECTRONICS AMERICA INC.; RENESAS  
ELECTRONICS CORPORATION; SAMSUNG  
ELECTRONICS COMPANY, LIMITED;  
SAMSUNG SEMICONDUCTOR, INC.;  
STMICROELECTRONICS, INC.;  
STMICROELECTRONICS, N.V.;  
TEXAS INSTRUMENTS, INC.; AND  
TRIDENT MICROSYSTEMS, INC.,

JURY DEMANDED

Defendants.

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**COMPLAINT FOR PATENT INFRINGEMENT**

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Plaintiff Intravisual Inc. files this complaint for patent infringement against Defendants Fujitsu Limited; Fujitsu Microelectronics America, Inc.; Marvell Semiconductor, Inc.; Marvell Technology Group Limited; NEC Electronics America, Inc.; NEC Electronics Corporation; NVIDIA Corporation; NXP B.V.; NXP Semiconductors USA, Inc.; Panasonic Corporation; Panasonic Corporation of North America; Qualcomm Inc.; Renesas Electronics America Inc.;

Renesas Electronics Corporation; Samsung Electronics Company, Limited; Samsung Semiconductor, Inc.; STMicroelectronics, Inc.; STMicroelectronics, N.V.; Texas Instruments, Inc.; and Trident Microsystems, Inc., and alleges as follows:

### **THE PARTIES**

1. Intravisual Inc. (“Intravisual”) is a Texas corporation having its principal place of business at 400 South Alamo Boulevard, Marshall, Texas 75670.
2. Fujitsu Limited is a Japanese corporation having its registered place of business at 4-1-1 Kamikodanaka, Nakahara-ku, Kawasaki-shi, Kanagawa 211-8588, Japan and its corporate headquarters at Shiodome City Center, 1-5-2 Higashi-Shimbashi, Minato-ku, Tokyo 105-7123, Japan.
3. Fujitsu Microelectronics America, Inc. is a California corporation having its principal place of business at 1250 E. Arques Avenue, M/S 333, Sunnyvale, California 94085-5401.
4. Marvell Semiconductor, Inc. is a California corporation having its principal place of business at 5488 Marvell Lane, Santa Clara, California 95054.
5. Marvell Technology Group Limited is a Bermuda corporation having its registered business address at Canon’s Court, 22 Victoria Street, Hamilton HM 12, Bermuda and its business mailing address at Argyle House, 41A Cedar Avenue, Hamilton HM 12, Bermuda.
6. NEC Electronics America, Inc. is a California corporation having its principal place of business at 2880 Scott Boulevard, Santa Clara, California 95050-2554.
7. NEC Electronics Corporation is a Japanese corporation having its principal place of business at 1753 Shimonumabe, Nakahara-ku, Kawasaki, Kanagawa 211-8668, Japan.
8. NVIDIA Corporation is a Delaware corporation having its principal place of business at 2701 San Tomas Expressway, Santa Clara, California 95050.
9. NXP B.V. is a Dutch corporation having its registered place of business at High Tech Campus 60, Eindhoven 5656 AG, The Netherlands.

10. NXP Semiconductors USA, Inc. is a Delaware corporation having its principal place of business at 1109 McKay Drive, San Jose, California 95131.

11. Panasonic Corporation is a Japanese corporation having its principal place of business at 1006 Oaza Kadoma, Kadoma, Osaka 571-8501, Japan.

12. Panasonic Corporation of North America is a Delaware corporation having its principal place of business at One Panasonic Way, Panazip 71-1, Secaucus, New Jersey 07094.

13. Qualcomm, Inc. is a Delaware corporation having its principal place of business at 5775 Morehouse Drive, San Diego, California 92121-1714.

14. Renesas Electronics America Inc. is a California corporation having its principal place of business at 2880 Scott Boulevard, PO Box 58062, Santa Clara, California 95052

15. Renesas Electronics Corporation is a Japanese corporation having its registered business address at 1753 Shimonumabe, Nakahara-Ku, Kawasaki, Kanagawa 211-8668, Japan and its headquarters at Nippon Building, 2-6-2, Ote-machi, Chiyoda-ku, Tokyo 100-0004, Japan.

16. Samsung Electronics Company, Limited is a Korean corporation having its principal place of business at Samsung Electronics Building, 1320-10, Seocho 2-dong, Seocho-gu, Seoul 137-857, Korea.

17. Samsung Semiconductor, Inc. is a California corporation having its principal place of business at 3655 North First Street, San Jose, California 95134.

18. STMicroelectronics, Inc. is a Delaware corporation having its principal place of business at 1310 Electronics Drive, Carrollton, Texas 75006-5039.

19. STMicroelectronics, N.V. is a Dutch corporation having its principal place of business at 39 Chemin du Champ des Filles, 1228 Plan-Les-Ouates, Geneva, Switzerland.

20. Texas Instruments, Inc. is a Delaware corporation having its principal place of business at 12500 TI Boulevard, P.O. Box 660199, Dallas, Texas 75266-0199.

21. Trident Microsystems, Inc. is a Delaware corporation having its principal place of business at 3408 Garrett Drive, Santa Clara, California 95054-2803.

## **JURISDICTION AND VENUE**

22. This is a claim for patent infringement and arises under the laws of the United States, Title 35 of the United States Code.

23. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

24. This Court has personal jurisdiction over Fujitsu Limited and Fujitsu Microelectronics America, Inc. (collectively, “Fujitsu”) because, upon information and belief, Fujitsu has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Fujitsu would not offend traditional notions of fair play and substantial justice. Upon information and belief, Fujitsu directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Fujitsu has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Fujitsu has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Fujitsu Microelectronics America, Inc. is registered to do business in the State of Texas and it identifies CT Corporation System, 350 North Saint Paul Street, Dallas, Texas 75201, as its registered agent.

25. This Court has personal jurisdiction over Marvell Semiconductor, Inc. and Marvell Technology Group Limited (collectively, “Marvell”) because, upon information and belief, Marvell has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Marvell would not offend traditional notions of fair play and substantial justice. Upon information and

belief, Marvell directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Marvell has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Marvell has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Marvell Semiconductor, Inc. is registered to do business in the State of Texas and it identifies CT Corporation System, 350 North Saint Paul Street, Dallas, Texas 75201, as its registered agent.

26. This Court has personal jurisdiction over NEC Electronics America, Inc. and NEC Electronics Corporation (collectively, “NEC”) because, upon information and belief, NEC has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over NEC would not offend traditional notions of fair play and substantial justice. Upon information and belief, NEC directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, NEC has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, NEC has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, NEC Electronics America, Inc. is registered to do business

in the State of Texas and it identifies CT Corporation System, 350 North Saint Paul Street, Dallas, Texas 75201, as its registered agent.

27. This Court has personal jurisdiction over NVIDIA Corporation (“NVIDIA”) because, upon information and belief, NVIDIA has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over NVIDIA would not offend traditional notions of fair play and substantial justice. Upon information and belief, NVIDIA directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, NVIDIA has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, NVIDIA has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, NVIDIA is registered to do business in the State of Texas and it identifies Corporation Service Company, 211 E. Seventh Street, Suite 620, Austin, Texas 78701-3218, as its registered agent.

28. This Court has personal jurisdiction over NXP B.V. and NXP Semiconductors USA, Inc. (collectively, “NXP”) because, upon information and belief, NXP has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over NXP would not offend traditional notions of fair play and substantial justice. Upon information and belief, NXP directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, NXP

has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, NXP has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, NXP Semiconductors USA, Inc. is registered to do business in the State of Texas and it identifies Corporation Service Company, 211 E. Seventh Street, Suite 620, Austin, Texas 78701-3218, as its registered agent.

29. This Court has personal jurisdiction over Panasonic Corporation and Panasonic Corporation of North America (collectively, "Panasonic") because, upon information and belief, Panasonic has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Panasonic would not offend traditional notions of fair play and substantial justice. Upon information and belief, Panasonic directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Panasonic has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Panasonic has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Panasonic Corporation of North America is registered to do business in the State of Texas and it identifies CT Corporation System, 350 North Saint Paul Street, Dallas, Texas 75201-4234, as its registered agent.

30. This Court has personal jurisdiction over Qualcomm, Inc. (“Qualcomm”) because, upon information and belief, Qualcomm has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Qualcomm would not offend traditional notions of fair play and substantial justice. Upon information and belief, Qualcomm directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Qualcomm has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Qualcomm has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Qualcomm is registered to do business in the State of Texas and it identifies Prentice Hall Corp. System, 211 E. Seventh Street, Suite 620, Austin, Texas 78701-3218, as its registered agent.

31. This Court has personal jurisdiction over Renesas Electronics America Inc. and Renesas Electronics Corporation (collectively “Renesas”) because, upon information and belief, Renesas has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Renesas would not offend traditional notions of fair play and substantial justice. Upon information and belief, Renesas directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Renesas has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by



consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Renesas has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Renesas Electronics America Inc. is registered to do business in the State of Texas and it identifies CT Corporation System, 350 North Saint Paul Street, Dallas, Texas 75201, as its registered agent.

32. This Court has personal jurisdiction over Samsung Electronics Company, Limited and Samsung Semiconductor, Inc. (collectively “Samsung”) because, upon information and belief, Samsung has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Samsung would not offend traditional notions of fair play and substantial justice. Upon information and belief, Samsung directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Samsung has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Samsung has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Samsung Semiconductor, Inc. is registered to do business in the State of Texas and it identifies National Registered Agents, Inc., 16055 Space Center, Suite 235, Houston, Texas 77062, as its registered agent.

33. This Court has personal jurisdiction over STMicroelectronics, Inc. and STMicroelectronics, N.V. (collectively “STMicroelectronics”) because, upon information and

belief, STMicroelectronics has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over STMicroelectronics would not offend traditional notions of fair play and substantial justice. Upon information and belief, STMicroelectronics directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, STMicroelectronics has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, STMicroelectronics has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, STMicroelectronics, Inc. maintains a place of business within the State of Texas, including, but not limited to a location at 1310 Electronics Drive, Mail Station 2308, Carrollton, Texas 75006-5039.

34. This Court has personal jurisdiction over Texas Instruments, Inc. (“Texas Instruments”) because, upon information and belief, Texas Instruments has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Texas Instruments would not offend traditional notions of fair play and substantial justice. Upon information and belief, Texas Instruments directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Texas Instruments has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased

by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Texas Instruments has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Texas Instruments maintains a place of business within the State of Texas, including, but not limited to a location at 12500 TI Boulevard, P.O. Box 660199, Dallas, Texas 75243.

35. This Court has personal jurisdiction over Trident Microsystems, Inc. (“Trident”) because, upon information and belief, Trident has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Trident would not offend traditional notions of fair play and substantial justice. Upon information and belief, Trident directly or through intermediaries (including distributors, retailers, subsidiaries, affiliates, and others) ships, distributes, offers for sale, sells, and/or advertises its products in the United States, the State of Texas, and the Eastern District of Texas. Further, upon information and belief, Trident has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, these infringing products have been and continue to be purchased by consumers in the United States, the State of Texas, and the Eastern District of Texas. Upon information and belief, Trident has committed the tort of patent infringement in the United States, the State of Texas, and the Eastern District of Texas. Moreover, Trident maintains places of business within the State of Texas, including, but not limited to a location at 9020 North Capital of Texas Highway, Building 2, Suite 545, Austin, Texas, 78759-7236.

36. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. §§ 1391(b) and (c), and 1400(b), because, upon information and belief, Fujitsu, Marvell, NEC, NVIDIA, NXP, Panasonic, Qualcomm, Renesas, Samsung, STMicroelectronics, Texas Instruments, and

Trident have committed acts of direct and indirect infringement in the Eastern District of Texas and have transacted business in the Eastern District of Texas.

### **THE PATENT-IN-SUIT**

37. Intravisual owns and has standing to sue for infringement of United States Patent No. 6,614,845 (“the ’845 patent”) (attached as Exhibit A), entitled “Method and Apparatus for Differential Macroblock Coding for Intra-Frame Data in Video Conference Systems.”

38. The ’845 patent was duly and legally issued by the United States Patent and Trademark Office on September 2, 2003, and has been duly and legally assigned to Intravisual.

### **COUNT ONE FUJITSU’S INFRINGEMENT OF THE PATENT-IN-SUIT**

39. Intravisual realleges and incorporates by reference paragraphs 1-38 above.

40. Upon information and belief, ITU-T Recommendation H.264, Advanced Video Coding For Generic Audiovisual Services, also known as ISO/IEC 14496-10, H.264/MPEG-4-AVC, H.264/AVC, and MPEG-4 Part 10 AVC (hereinafter “H.264”) is a standard for compressing and decompressing digital video.

41. Upon information and belief, Fujitsu has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Fujitsu products with the following model numbers: MB86H51, MB86H55, MB86H56, and MB86H60.

42. Upon information and belief, Fujitsu has infringed one or more claims of the ’845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Fujitsu products with the following model numbers: MB86H51, MB86H55, MB86H56, and MB86H60, throughout the United States, including in this judicial district.

43. Upon information and belief, Fujitsu has infringed one or more claims of the ’845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or

importing devices that incorporate Fujitsu video decoders that comply with H.264 throughout the United States, including in this judicial district.

44. Upon information and belief, Fujitsu markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Fujitsu products with the following model numbers: MB86H51, MB86H55, MB86H56, and MB86H60, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

45. Upon information and belief, Fujitsu has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Fujitsu products with the following model numbers: MB86H51, MB86H55, MB86H56, and MB86H60, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

46. Upon information and belief, Fujitsu will continue its infringing acts unless restrained from doing so by this Court.

47. Intravisual has been damaged by the infringing acts of Fujitsu.

**COUNT TWO**  
**MARVELL'S INFRINGEMENT OF THE PATENT-IN-SUIT**

48. Intravisual realleges and incorporates by reference paragraphs 1-47 above.

49. Upon information and belief, Marvell has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Marvell products with the following model numbers: ARMADA™ 510, ARMADA™ 610, ARMADA™ 618, and ARMADA™ 1000.

50. Upon information and belief, Marvell has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Marvell products with the following model numbers: ARMADA™ 510, ARMADA™ 610, ARMADA™ 618, and ARMADA™ 1000, throughout the United States, including in this judicial district.

51. Upon information and belief, Marvell markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Marvell products with the following model numbers: ARMADA™ 510, ARMADA™ 610, ARMADA™ 618, and ARMADA™ 1000, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

52. Upon information and belief, Marvell has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Marvell products with the following model numbers: ARMADA™ 510, ARMADA™ 610, ARMADA™ 618, and ARMADA™ 1000, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

53. Upon information and belief, Marvell will continue its infringing acts unless restrained from doing so by this Court.

54. Intravisual has been damaged by the infringing acts of Marvell.

**COUNT THREE**  
**NEC'S INFRINGEMENT OF THE PATENT-IN-SUIT**

55. Intravisual realleges and incorporates by reference paragraphs 1-54 above.

56. Upon information and belief, NEC has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video

decoders that comply with H.264, including, but not limited to NEC products with the following model numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303).

57. Upon information and belief, NEC has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to NEC products with the following model numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303), throughout the United States, including in this judicial district.

58. Upon information and belief, NEC markets, supplies, and sells video decoders that comply with H.264, including, but not limited to NEC products with the following model numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303), with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be

placed into national distribution networks throughout the United States, including in this judicial district.

59. Upon information and belief, NEC has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to NEC products with the following model numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303), with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

60. Upon information and belief, NEC will continue its infringing acts unless restrained from doing so by this Court.

61. Intravisual has been damaged by the infringing acts of NEC.

**COUNT FOUR**  
**NVIDIA'S INFRINGEMENT OF THE PATENT-IN-SUIT**

62. Intravisual realleges and incorporates by reference paragraphs 1-61 above.

63. Upon information and belief, NVIDIA has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to NVIDIA products with the following model numbers: Tegra™ 600, Tegra™ 650, Tegra™ APX 2500, and Tegra™ APX 2600.

64. Upon information and belief, NVIDIA has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or



importing video decoders that comply with H.264, including, but not limited to NVIDIA products with the following model numbers: Tegra™ 600, Tegra™ 650, Tegra™ APX 2500, and Tegra™ APX 2600, throughout the United States, including in this judicial district.

65. Upon information and belief, NVIDIA markets, supplies, and sells video decoders that comply with H.264, including, but not limited to NVIDIA products with the following model numbers: Tegra™ 600, Tegra™ 650, Tegra™ APX 2500, and Tegra™ APX 2600, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

66. Upon information and belief, NVIDIA has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to NVIDIA products with the following model numbers: Tegra™ 600, Tegra™ 650, Tegra™ APX 2500, and Tegra™ APX 2600, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

67. Upon information and belief, NVIDIA will continue its infringing acts unless restrained from doing so by this Court.

68. Intravisual has been damaged by the infringing acts of NVIDIA.

**COUNT FIVE**  
**NXP'S INFRINGEMENT OF THE PATENT-IN-SUIT**

69. Intravisual realleges and incorporates by reference paragraphs 1-68 above.

70. Upon information and belief, NXP has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to NXP products with the following

model numbers: TV543, TV550, CX2450x, PNX8336, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E.

71. Upon information and belief, NXP has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to NXP products with the following model numbers: TV543, TV550, CX2450x, PNX8336, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E, throughout the United States, including in this judicial district.

72. Upon information and belief, NXP markets, supplies, and sells video decoders that comply with H.264, including, but not limited to NXP products with the following model numbers: TV543, TV550, CX2450x, PNX8336, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

73. Upon information and belief, NXP has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to NXP products with the following model numbers: TV543, TV550, CX2450x, PNX8336, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

74. Upon information and belief, NXP will continue its infringing acts unless restrained from doing so by this Court.

75. Intravisual has been damaged by the infringing acts of NXP.

**COUNT SIX**  
**PANASONIC'S INFRINGEMENT OF THE PATENT-IN-SUIT**

76. Intravisual realleges and incorporates by reference paragraphs 1-75 above.

77. Upon information and belief, Panasonic has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Panasonic's UniPhier Systems on a Chip ("SoC").

78. Upon information and belief, Panasonic has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Panasonic's UniPhier SoCs, throughout the United States, including in this judicial district.

79. Upon information and belief, Panasonic has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing devices that incorporate Panasonic video decoders that comply with H.264 throughout the United States, including in this judicial district.

80. Upon information and belief, Panasonic markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Panasonic's UniPhier SoCs, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

81. Upon information and belief, Panasonic has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Panasonic's UniPhier SoCs, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

82. Upon information and belief, Panasonic will continue its infringing acts unless restrained from doing so by this Court.

83. Intravisual has been damaged by the infringing acts of Panasonic.

**COUNT SEVEN**  
**QUALCOMM'S INFRINGEMENT OF THE PATENT-IN-SUIT**

84. Intravisual realleges and incorporates by reference paragraphs 1-83 above.

85. Upon information and belief, Qualcomm has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Qualcomm's Snapdragon Processors.

86. Upon information and belief, Qualcomm has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Qualcomm's Snapdragon Processors, throughout the United States, including in this judicial district.

87. Upon information and belief, Qualcomm markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Qualcomm's Snapdragon Processors, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

88. Upon information and belief, Qualcomm has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Qualcomm's Snapdragon Processors, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

89. Upon information and belief, Qualcomm will continue its infringing acts unless restrained from doing so by this Court.

90. Intravisual has been damaged by the infringing acts of Qualcomm.

**COUNT EIGHT**  
**RENESAS'S INFRINGEMENT OF THE PATENT-IN-SUIT**

91. Intravisual realleges and incorporates by reference paragraphs 1-90 above.

92. Upon information and belief, Renesas has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Renesas products with the following model numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303).

93. Upon information and belief, Renesas has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Renesas products with the following model numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303) throughout the United States, including in this judicial district.

94. Upon information and belief, Renesas markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Renesas products with the following model

numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303), with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

95. Upon information and belief, Renesas has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Renesas products with the following model numbers: EMMA3 ( $\mu$ PD61334A); EMMA3P (MC-10092); EMMA3PF (MC-10121); EMMA3SL/HD (MC-10085, MC-10086, MC-100087, and MC-10088); EMMA3SL/L ( $\mu$ PD61310,  $\mu$ PD61311,  $\mu$ PD61312,  $\mu$ PD61313, and  $\mu$ PD61314); EMMA3SL/LP ( $\mu$ PD61315,  $\mu$ PD61316,  $\mu$ PD61317,  $\mu$ PD61318, and  $\mu$ PD61319); EMMA3SL/P ( $\mu$ PD61320 and  $\mu$ PD61321); EMMA3SL/SD ( $\mu$ PD61304,  $\mu$ PD61305,  $\mu$ PD61306,  $\mu$ PD61307,  $\mu$ PD61308, and  $\mu$ PD61309); and EMMA3SV ( $\mu$ PD61300 and  $\mu$ PD61303), with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

96. Upon information and belief, Renesas will continue its infringing acts unless restrained from doing so by this Court.

97. Intravisual has been damaged by the infringing acts of Renesas.

**COUNT NINE**  
**SAMSUNG'S INFRINGEMENT OF THE PATENT-IN-SUIT**

98. Intravisual realleges and incorporates by reference paragraphs 1-97 above.

99. Upon information and belief, Samsung has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Samsung products with the following model numbers: S5PC100 and S3C6410.

100. Upon information and belief, Samsung has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Samsung products with the following model numbers: S5PC100 and S3C6410, throughout the United States, including in this judicial district.

101. Upon information and belief, Samsung has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing devices that incorporate Samsung video decoders that comply with H.264 throughout the United States, including in this judicial district.

102. Upon information and belief, Samsung markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Samsung products with the following model numbers: S5PC100 and S3C6410, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

103. Upon information and belief, Samsung has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Samsung products with the following model numbers: S5PC100 and S3C6410, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

104. Upon information and belief, Samsung will continue its infringing acts unless restrained from doing so by this Court.

105. Intravisual has been damaged by the infringing acts of Samsung.

**COUNT TEN**  
**STMICROELECTRONICS' INFRINGEMENT OF THE PATENT-IN-SUIT**

106. Intravisual realleges and incorporates by reference paragraphs 1-105 above.

107. Upon information and belief, STMicroelectronics has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to STMicroelectronics products with the following model numbers: STi5200, STi5202, STi5205, STi5211, STi5267, STi5289, STi7100, STi7101, STi7105, STi7106, STi7108, STi7109, STi7111, STi7141, STi7162, and STi7200.

108. Upon information and belief, STMicroelectronics has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to STMicroelectronics products with the following model numbers: STi5200, STi5202, STi5205, STi5211, STi5267, STi5289, STi7100, STi7101, STi7105, STi7106, STi7108, STi7109, STi7111, STi7141, STi7162, and STi7200, throughout the United States, including in this judicial district.

109. Upon information and belief, STMicroelectronics markets, supplies, and sells video decoders that comply with H.264, including, but not limited to STMicroelectronics products with the following model numbers: STi5200, STi5202, STi5205, STi5211, STi5267, STi5289, STi7100, STi7101, STi7105, STi7106, STi7108, STi7109, STi7111, STi7141, STi7162, and STi7200, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.



110. Upon information and belief, STMicroelectronics has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to STMicroelectronics products with the following model numbers: STi5200, STi5202, STi5205, STi5211, STi5267, STi5289, STi7100, STi7101, STi7105, STi7106, STi7108, STi7109, STi7111, STi7141, STi7162, and STi7200, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

111. Upon information and belief, STMicroelectronics will continue its infringing acts unless restrained from doing so by this Court.

112. Intravidual has been damaged by the infringing acts of STMicroelectronics.

**COUNT ELEVEN**  
**TEXAS INSTRUMENTS' INFRINGEMENT OF THE PATENT-IN-SUIT**

113. Intravidual realleges and incorporates by reference paragraphs 1-112 above.

114. Upon information and belief, Texas Instruments has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Texas Instruments products with the following model numbers: OMAP3525, OMAP3530, TMS320DM365-270, TMS320DM365-300, TMS320DM641-500, TMS320DM641-600, TMS320DM642-500, TMS320DM642-600, TMS320DM642-720, TMS320DM6433-400, TMS320DM6433-500, TMS320DM6433-600, TMS320DM6433-700, TMS320DM643-500, TMS320DM643-600, TMS320DM6437-400, TMS320DM6437-500, TMS320DM6437-600, TMS320DM6437-700, TMS320DM6441-405, TMS320DM6441-513, TMS320DM6443-594, TMS320DM6446-513, TMS320DM6446-594, TMS320DM6467-594, TMS320DM6467-729, TMS320DM647-720, TMS320DM647-900, TMS320DM648-720, and TMS320DM648-900.

115. Upon information and belief, Texas Instruments has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Texas Instruments products with the following model numbers: OMAP3525, OMAP3530, TMS320DM365-270, TMS320DM365-300, TMS320DM641-500, TMS320DM641-600, TMS320DM642-500, TMS320DM642-600, TMS320DM642-720, TMS320DM6433-400, TMS320DM6433-500, TMS320DM6433-600, TMS320DM6433-700, TMS320DM643-500, TMS320DM643-600, TMS320DM6437-400, TMS320DM6437-500, TMS320DM6437-600, TMS320DM6437-700, TMS320DM6441-405, TMS320DM6441-513, TMS320DM6443-594, TMS320DM6446-513, TMS320DM6446-594, TMS320DM6467-594, TMS320DM6467-729, TMS320DM647-720, TMS320DM647-900, TMS320DM648-720, and TMS320DM648-900, throughout the United States, including in this judicial district.

116. Upon information and belief, Texas Instruments markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Texas Instruments products with the following model numbers: OMAP3525, OMAP3530, TMS320DM365-270, TMS320DM365-300, TMS320DM641-500, TMS320DM641-600, TMS320DM642-500, TMS320DM642-600, TMS320DM642-720, TMS320DM6433-400, TMS320DM6433-500, TMS320DM6433-600, TMS320DM6433-700, TMS320DM643-500, TMS320DM643-600, TMS320DM6437-400, TMS320DM6437-500, TMS320DM6437-600, TMS320DM6437-700, TMS320DM6441-405, TMS320DM6441-513, TMS320DM6443-594, TMS320DM6446-513, TMS320DM6446-594, TMS320DM6467-594, TMS320DM6467-729, TMS320DM647-720, TMS320DM647-900, TMS320DM648-720, and TMS320DM648-900, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

117. Upon information and belief, Texas Instruments has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation

of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Texas Instruments products with the following model numbers: OMAP3525, OMAP3530, TMS320DM365-270, TMS320DM365-300, TMS320DM641-500, TMS320DM641-600, TMS320DM642-500, TMS320DM642-600, TMS320DM642-720, TMS320DM6433-400, TMS320DM6433-500, TMS320DM6433-600, TMS320DM6433-700, TMS320DM643-500, TMS320DM643-600, TMS320DM6437-400, TMS320DM6437-500, TMS320DM6437-600, TMS320DM6437-700, TMS320DM6441-405, TMS320DM6441-513, TMS320DM6443-594, TMS320DM6446-513, TMS320DM6446-594, TMS320DM6467-594, TMS320DM6467-729, TMS320DM647-720, TMS320DM647-900, TMS320DM648-720, and TMS320DM648-900, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

118. Upon information and belief, Texas Instruments will continue its infringing acts unless restrained from doing so by this Court.

119. Intravisual has been damaged by the infringing acts of Texas Instruments.

**COUNT TWELVE**  
**TRIDENT'S INFRINGEMENT OF THE PATENT-IN-SUIT**

120. Intravisual realleges and incorporates by reference paragraphs 1-119 above.

121. Upon information and belief, Trident has made, used, offered to sell, sold, and/or imported and continues to make, use, offer to sell, sell, and/or import in the United States video decoders that comply with H.264, including, but not limited to Trident products with the following model numbers: CX2450x, PNX8336, PNX8543, PNX8550x, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E.

122. Upon information and belief, Trident has infringed one or more claims of the '845 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, selling, and/or importing video decoders that comply with H.264, including, but not limited to Trident products

with the following model numbers: CX2450x, PNX8336, PNX8543, PNX8550x, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E, throughout the United States, including in this judicial district.

123. Upon information and belief, Trident markets, supplies, and sells video decoders that comply with H.264, including, but not limited to Trident products with the following model numbers: CX2450x, PNX8336, PNX8543, PNX8550x, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

124. Upon information and belief, Trident has actively induced others to infringe and contributed to the infringement of one or more claims of the '845 patent in violation of 35 U.S.C. § 271(b) and (c) through its marketing, supplying, and sale of video decoders that comply with H.264, including, but not limited to Trident products with the following model numbers: CX2450x, PNX8336, PNX8543, PNX8550x, PNX1700EH, PNX1701EH, PNX1702EH, PNX1500E, PNX1501E, and PNX1502E, with the knowledge and intent that such products are to be integrated into other downstream electronic products, and that such products are to be placed into national distribution networks throughout the United States, including in this judicial district.

125. Upon information and belief, Trident will continue its infringing acts unless restrained from doing so by this Court.

126. Intravisual has been damaged by the infringing acts of Trident.

#### **PRAYER FOR RELIEF**

WHEREFORE, Intravisual demands judgment against Fujitsu, Marvell, NEC, NVIDIA, NXP, Panasonic, Qualcomm, Renesas, Samsung, STMicroelectronics, Texas Instruments, and

Trident including their affiliates, officers, agents, servants, employees, and all persons in active concert or participation with them, as follows:

A. A permanent injunction prohibiting Fujitsu, Marvell, NEC, NVIDIA, NXP, Panasonic, Qualcomm, Renesas, Samsung, STMicroelectronics, Texas Instruments, and Trident from further acts of infringement of the '845 patent;

B. An award to Intravisual of such damages under 35 U.S.C. § 284 as it shall prove against Fujitsu, Marvell, NEC, NVIDIA, NXP, Panasonic, Qualcomm, Renesas, Samsung, STMicroelectronics, Texas Instruments, and Trident for infringement of the '845 patent, together with pre-judgment and post-judgment interest;

C. An award to Intravisual of the costs of this action and its reasonable attorneys' fees pursuant to 35 U.S.C. § 285; and

D. Such other and further relief as this Court may deem just and appropriate.

#### **JURY DEMAND**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Intravisual demands a trial by jury.

Respectfully submitted,

/s/ Alan M. Fisch

Date: June 1, 2010

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2010 I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record. The remaining parties will be served pursuant to Rules 4 and 5 of the Federal Rules of Civil Procedure.

/s/ Alan M. Fisch

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