

DEWEY BALLANTINE LLP
1950 University Avenue, Suite 500
East Palo Alto, CA 94303-2225

1 James J. Elacqua (State Bar No.: 187897)
E-mail: JElacqua@dbllp.com
2 Jeannine Yoo Sano (State Bar No.: 174190)
E-mail: JSano@dbllp.com
3 DEWEY BALLANTINE LLP
1950 University Avenue, Suite 500
4 East Palo Alto, California 94303-2225
Telephone: (650) 845-7000
5 Facsimile: (650) 845-7333

6 Kevin S. Kudlac (admitted *pro hac vice*)
E-mail: KKudlac@dbllp.com
7 Pierre J. Hubert (admitted *pro hac vice*)
E-mail: PHubert@dbllp.com
8 Brian K. Erickson (admitted *pro hac vice*)
E-mail: BErickson@dbllp.com
9 DEWEY BALLANTINE LLP
401 Congress Avenue, Suite 3200
10 Austin, Texas 78701
Telephone: (512) 226-0300
11 Facsimile: (512) 226-0333

12 Attorneys for Plaintiff
Rambus Inc.

13
14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
15 **SAN FRANCISCO DIVISION**

16 RAMBUS INC.,
17
18 Plaintiff,
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20 v.

21 HYNIX SEMICONDUCTOR INC., HYNIX
22 SEMICONDUCTOR AMERICA INC., HYNIX
23 SEMICONDUCTOR MANUFACTURING
24 AMERICA INC.,

25 SAMSUNG ELECTRONICS CO., LTD.,
26 SAMSUNG ELECTRONICS AMERICA,
27 INC., SAMSUNG SEMICONDUCTOR, INC.,
28 SAMSUNG AUSTIN SEMICONDUCTOR,
L.P.,

NANYA TECHNOLOGY CORPORATION,
NANYA TECHNOLOGY CORPORATION
U.S.A.,

INOTERA MEMORIES, INC.,
Defendants.

Case No. C 05 00334 EDL

**FIRST AMENDED COMPLAINT
FOR PATENT INFRINGEMENT
AND JURY DEMAND**

1 Plaintiff Rambus Inc. states the following as its Complaint against Defendants Hynix
2 Semiconductor Inc., Hynix Semiconductor America Inc., Hynix Semiconductor Manufacturing
3 America Inc., Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung
4 Semiconductor, Inc., Samsung Austin Semiconductor, L.P., Nanya Technology Corporation,
5 Nanya Technology Corporation U.S.A., and Inotera Memories, Inc. (collectively “Defendants”).

6 **THE PARTIES**

7 1. Rambus is a corporation organized and existing under the laws of Delaware, with
8 its principal place of business in Los Altos, California. Rambus is a technology leader in
9 developing chip-to-chip interface solutions that enable higher performance and system
10 bandwidth for a broad range of consumer electronic, computing and networking applications.
11 Rambus memory and logic interface products provide the connection from chip-to-chip, system-
12 to-system and person-to-person, enabling state-of-the-art performance for users of PCs, video
13 game consoles, printers, digital TVs, set-top boxes, printers, video projectors, network switches
14 and routers.

15 2. Upon information and belief, Defendant Hynix Semiconductor Inc. is a
16 corporation organized and existing under the laws of Korea, with its headquarters located at San
17 136-1, Ami-Ri Bubal-eub Ichon-si Kyoungki-do, Korea 467-860. Defendant Hynix
18 Semiconductor America Inc., a wholly owned subsidiary of Hynix Semiconductor Inc., is a
19 corporation organized and existing under the laws of Delaware, with its principal place of
20 business located at 3101 North First Street, San Jose, California 95134. Defendant Hynix
21 Semiconductor Manufacturing America Inc. is a California corporation, having its principal
22 place of business at 1830 Willow Creek Circle, Eugene, Oregon 97402. Defendants Hynix
23 Semiconductor Inc., Hynix Semiconductor America Inc., and Hynix Semiconductor
24 Manufacturing America Inc. (collectively “Hynix”) transact substantial business, either directly
25 or through their agents, on an ongoing basis in this judicial district and elsewhere in the United
26 States.

1 3. Upon information and belief, Samsung Electronics Co., Ltd.. is a corporation
2 organized and existing under the laws of Korea, with a principal place of business at 250, 2-ka,
3 Taepyung-ro, Chung-Ku, Seoul, South Korea, 100-742. Defendant Samsung Electronics
4 America, Inc. is a wholly owned subsidiary of Samsung Electronics Co. Ltd., with its principal
5 place of business at 105 Challenger Road, Ridgefield Park, NJ 07660. Defendant Samsung
6 Semiconductor, Inc. is a wholly owned subsidiary of Samsung Electronics Co. Ltd., with its
7 principal place of business at 3655 North First Street, San Jose, CA. 95134. Defendant Samsung
8 Austin Semiconductor, L.P. is a limited partnership owned by Samsung Electronics Co. Ltd.,
9 with its principal place of business at 12100 Samsung Boulevard, Austin, TX 78754. Defendants
10 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor,
11 Inc., and Samsung Austin Semiconductor, L.P. (collectively “Samsung”) transact substantial
12 business, either directly or through their agents, on an ongoing basis in this judicial district and
13 elsewhere in the United States.

14 4. Upon information and belief, Defendant Nanya Technology Corporation is a
15 corporation organized and existing under the laws of Taiwan, with a principal place of business
16 located at Hwa Ya Technology Park 669 Fu Hsing 3rd Road, Kueishan, Taoyuan, Taiwan R.O.C.
17 Defendant Nanya Technology Corporation U.S.A. is a wholly owned subsidiary of Nanya
18 Technology Corporation, with its principal place of business at 675 East Brokaw Road, San Jose,
19 California 95112. Defendants Nanya Technology Corporation and Nanya Technology
20 Corporation U.S.A. (collectively “Nanya”) transact substantial business, either directly or
21 through their agents, on an ongoing basis in this judicial district and elsewhere in the United
22 States.

23 5. Upon information and belief, Defendant Inotera Memories, Inc. (“Inotera”), a
24 corporation organized and existing under the laws of Taiwan with its headquarters located at
25 Hwa Ya Technology Park, 667 Fu Hsing 3rd Road, Kueishan, Taoyuan, Taiwan R.O.C., is a
26 joint venture involving Nanya, which transacts substantial business, either directly or through its
27 agents, on an ongoing basis in this judicial district and elsewhere in the United States.
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1 19. On July 10, 2001, U.S. Patent No. 6,260,097 was duly and legally issued to
2 Rambus, as assignee of the inventors named therein, for an invention entitled “Method and
3 Apparatus for Controlling a Synchronous Memory Device.” A true and correct copy of the ’097
4 Patent is attached as Exhibit B and incorporated herein by reference.

5 20. On July 24, 2001, U.S. Patent No. 6,266,285 was duly and legally issued to
6 Rambus, as assignee of the inventors named therein, for an invention entitled “Method of
7 Operating a Memory Device Having Write Latency.” A true and correct copy of the ’285 Patent
8 is attached as Exhibit C and incorporated herein by reference.

9 21. On November 6, 2001, U.S. Patent No. 6,314,051 was duly and legally issued to
10 Rambus, as assignee of the inventors named therein, for an invention entitled “Memory Device
11 Having Write Latency.” A true and correct copy of the ’051 Patent is attached as Exhibit D and
12 incorporated herein by reference.

13 22. On November 27, 2001, U.S. Patent No. 6,324,120 was duly and legally issued to
14 Rambus, as assignee of the inventors named therein, for an invention entitled “Memory Device
15 Having a Variable Data Output Length.” A true and correct copy of the ’120 Patent is attached
16 as Exhibit E and incorporated herein by reference.

17 23. On April 23, 2002, U.S. Patent No. 6,378,020 was duly and legally issued to
18 Rambus, as assignee of the inventors named therein, for an invention entitled “System Having
19 Double Data Transfer Rate and Intergrated Circuit Therefor.” A true and correct copy of the
20 ’8,020 Patent is attached as Exhibit F and incorporated herein by reference.

21 24. On July 30, 2002, U.S. Patent No. 6,426,916 was duly and legally issued to
22 Rambus, as assignee of the inventors named therein, for an invention entitled “Memory Device
23 Having a Variable Data Output Length and a Programmable Register.” A true and correct copy
24 of the ’916 Patent is attached as Exhibit G and incorporated herein by reference.

25 25. On September 17, 2002, U.S. Patent No. 6,452,863 was duly and legally issued to
26 Rambus, as assignee of the inventors named therein, for an invention entitled “Method of
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1 Operating a Memory Device Having a Variable Data Input Length.” A true and correct copy of
2 the ’863 Patent is attached as Exhibit H and incorporated herein by reference.

3 26. On December 10, 2002, U.S. Patent No. 6,493,789 was duly and legally issued to
4 Rambus, as assignee of the inventors named therein, for an invention entitled “Memory Device
5 Which Receives Write Masking and Automatic Precharge Information.” A true and correct copy
6 of the ’789 Patent is attached as Exhibit I and incorporated herein by reference.

7 27. On December 17, 2002, U.S. Patent No. 6,496,897 was duly and legally issued to
8 Rambus, as assignee of the inventors named therein, for an invention entitled “Semiconductor
9 Memory Device Which Receives Write Masking Information.” A true and correct copy of the
10 ’897 Patent is attached as Exhibit J and incorporated herein by reference.

11 28. On April 8, 2003, U.S. Patent No. 6,546,446 was duly and legally issued to
12 Rambus, as assignee of the inventors named therein, for an invention entitled “Synchronous
13 Memory Device Having Automatic Precharge.” A true and correct copy of the ’6,446 Patent is
14 attached as Exhibit K and incorporated herein by reference.

15 29. On May 13, 2003, U.S. Patent No. 6,564,281 was duly and legally issued to
16 Rambus, as assignee of the inventors named therein, for an invention entitled “Synchronous
17 Memory Device Having Automatic Precharge.” A true and correct copy of the ’281 Patent is
18 attached as Exhibit L and incorporated herein by reference.

19 30. On June 24, 2003, U.S. Patent No. 6,584,037 was duly and legally issued to
20 Rambus, as assignee of the inventors named therein, for an invention entitled “Memory Device
21 Which Samples Data After an Amount of Time Transpires.” A true and correct copy of the ’037
22 Patent is attached as Exhibit M and incorporated herein by reference.

23 31. On February 24, 2004, U.S. Patent No. 6,697,295 was duly and legally issued to
24 Rambus, as assignee of the inventors named therein, for an invention entitled “Memory Device
25 Having a Programmable Register.” A true and correct copy of the ’295 Patent is attached as
26 Exhibit N and incorporated herein by reference.

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1 32. On March 2, 2004, U.S. Patent No. 6,701,446 was duly and legally issued to
2 Rambus, as assignee of the inventors named therein, for an invention entitled “Power Control
3 System for Synchronous Memory Device.” A true and correct copy of the ’1,446 Patent is
4 attached as Exhibit O and incorporated herein by reference.

5 33. On March 30, 2004, U.S. Patent No. 6,715,020 was duly and legally issued to
6 Rambus, as assignee of the inventors named therein, for an invention entitled “Synchronous
7 Integrated Circuit Device.” A true and correct copy of the ’5,020 Patent is attached as Exhibit P
8 and incorporated herein by reference.

9 34. On June 15, 2004, U.S. Patent No. 6,751,696 was duly and legally issued to
10 Rambus, as assignee of the inventors named therein, for an invention entitled “Memory Device
11 Having a Programmable Register.” A true and correct copy of the ’696 Patent is attached as
12 Exhibit Q and incorporated herein by reference.

13 35. On October 19, 2004, U.S. Patent No. 6,807,598 was duly and legally issued to
14 and legally issued to Rambus, as assignee of the inventors named therein, for an invention
15 entitled “Integrated Circuit Device Having Double Data Rate Capability.” A true and correct
16 copy of the ’598 Patent is attached as Exhibit R and incorporated herein by reference.

17 36. At all relevant times, Rambus has been the owner of the entire right, title, and
18 interest in each of the Rambus Patents.

19 37. Rambus is entitled to recover from Defendants the actual damages sustained by
20 Rambus as a result of Defendants’ wrongful acts alleged herein under 35 U.S.C. § 284 in an
21 amount to be proven at trial, together with interest and costs.

22 38. Upon information and belief, Defendants' infringement of the Rambus Patents as
23 set forth herein is willful, deliberate and in disregard of Rambus’ patent rights, and Rambus is
24 therefore entitled to increased damages up to three times the amount of actual damages and
25 attorneys’ fees, pursuant to 35 U.S.C. §§ 284, 285.

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COUNT I
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,182,184
Under 35 U.S.C. § 271, et. seq.)

39. Rambus incorporates by reference and realleges paragraphs 1 through 38 above as though fully restated herein.

40. Upon information and belief, Defendants (1) have infringed and continue to infringe the '184 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '184 Patent, and/or actively induced others to infringe the '184 Patent, in this district and elsewhere in the United States.

COUNT II
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,260,097
Under 35 U.S.C. § 271, et. seq.)

41. Rambus incorporates by reference and realleges paragraphs 1 through 40 above as though fully restated herein.

42. Upon information and belief, Defendants (1) have infringed and continue to infringe the '097 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '097 Patent, and/or actively induced others to infringe the '097 Patent, in this district and elsewhere in the United States.

COUNT III
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,266,285
Under 35 U.S.C. § 271, et. seq.)

43. Rambus incorporates by reference and realleges paragraphs 1 through 42 above as though fully restated herein.

44. Upon information and belief, Defendants (1) have infringed and continue to infringe the '285 Patent by making, using, offering to sell, selling (directly or through

1 intermediaries), and importing, in this district and elsewhere in the United States, Accused
2 Products, and/or (2) have contributed to the infringement of the '285 Patent, and/or actively
3 induced others to infringe the '285 Patent, in this district and elsewhere in the United States.

4 **COUNT IV**
5 **Against All Defendants**
6 **(Patent Infringement of U.S. Patent No. 6,314,051**
7 **Under 35 U.S.C. § 271, et. seq.)**

8 45. Rambus incorporates by reference and realleges paragraphs 1 through 44 above as
9 though fully restated herein.

10 46. Upon information and belief, Defendants (1) have infringed and continue to
11 infringe the '051 Patent by making, using, offering to sell, selling (directly or through
12 intermediaries), and importing, in this district and elsewhere in the United States, Accused
13 Products, and/or (2) have contributed to the infringement of the '051 Patent, and/or actively
14 induced others to infringe the '051 Patent, in this district and elsewhere in the United States.

15 **COUNT V**
16 **Against Nanya and Inotera Only**
17 **(Patent Infringement of U.S. Patent No. 6,324,120**
18 **Under 35 U.S.C. § 271, et. seq.)**

19 47. Rambus incorporates by reference and realleges paragraphs 1 through 46 above as
20 though fully restated herein.

21 48. Upon information and belief, Nanya and Inotera (1) have infringed and continue
22 to infringe the '120 Patent by making, using, offering to sell, selling (directly or through
23 intermediaries), and importing, in this district and elsewhere in the United States, Accused
24 Products, and/or (2) have contributed to the infringement of the '120 Patent, and/or actively
25 induced others to infringe the '120 Patent, in this district and elsewhere in the United States.
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COUNT VI
Against Nanya and Inotera Only
(Patent Infringement of U.S. Patent No. 6,378,020
Under 35 U.S.C. § 271, *et. seq.*)

49. Rambus incorporates by reference and realleges paragraphs 1 through 48 above as though fully restated herein.

50. Upon information and belief, Nanya and Inotera (1) have infringed and continue to infringe the '8,020 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '8,020 Patent, and/or actively induced others to infringe the '8,020 Patent, in this district and elsewhere in the United States.

COUNT VII
Against Nanya and Inotera Only
(Patent Infringement of U.S. Patent No. 6,426,916
Under 35 U.S.C. § 271, *et. seq.*)

51. Rambus incorporates by reference and realleges paragraphs 1 through 50 above as though fully restated herein.

52. Upon information and belief, Nanya and Inotera (1) have infringed and continue to infringe the '916 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '916 Patent, and/or actively induced others to infringe the '916 Patent, in this district and elsewhere in the United States.

COUNT VIII
Against Nanya and Inotera Only
(Patent Infringement of U.S. Patent No. 6,452,863
Under 35 U.S.C. § 271, *et. seq.*)

53. Rambus incorporates by reference and realleges paragraphs 1 through 52 above as though fully restated herein.

54. Upon information and belief, Nanya and Inotera (1) have infringed and continue to infringe the '863 Patent by making, using, offering to sell, selling (directly or through

1 intermediaries), and importing, in this district and elsewhere in the United States, Accused
2 Products, and/or (2) have contributed to the infringement of the '863 Patent, and/or actively
3 induced others to infringe the '863 Patent, in this district and elsewhere in the United States.

4 **COUNT IX**
5 **Against All Defendants**
6 **(Patent Infringement of U.S. Patent No. 6,493,789**
7 **Under 35 U.S.C. § 271, et. seq.)**

8 55. Rambus incorporates by reference and realleges paragraphs 1 through 54 above as
9 though fully restated herein.

10 56. Upon information and belief, Defendants (1) have infringed and continue to
11 infringe the '789 Patent by making, using, offering to sell, selling (directly or through
12 intermediaries), and importing, in this district and elsewhere in the United States, Accused
13 Products, and/or (2) have contributed to the infringement of the '789 Patent, and/or actively
14 induced others to infringe the '789 Patent, in this district and elsewhere in the United States.

15 **COUNT X**
16 **Against All Defendants**
17 **(Patent Infringement of U.S. Patent No. 6,496,897**
18 **Under 35 U.S.C. § 271, et. seq.)**

19 57. Rambus incorporates by reference and realleges paragraphs 1 through 56 above as
20 though fully restated herein.

21 58. Upon information and belief, Defendants (1) have infringed and continue to
22 infringe the '897 Patent by making, using, offering to sell, selling (directly or through
23 intermediaries), and importing, in this district and elsewhere in the United States, Accused
24 Products, and/or (2) have contributed to the infringement of the '897 Patent, and/or actively
25 induced others to infringe the '897 Patent, in this district and elsewhere in the United States.
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COUNT XI
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,546,446
Under 35 U.S.C. § 271, et. seq.)

59. Rambus incorporates by reference and realleges paragraphs 1 through 58 above as though fully restated herein.

60. Upon information and belief, Defendants (1) have infringed and continue to infringe the '6,446 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '6,446 Patent, and/or actively induced others to infringe the '6,446 Patent, in this district and elsewhere in the United States.

COUNT XII
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,564,281
Under 35 U.S.C. § 271, et. seq.)

61. Rambus incorporates by reference and realleges paragraphs 1 through 60 above as though fully restated herein.

62. Upon information and belief, Defendants (1) have infringed and continue to infringe the '281 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '281 Patent, and/or actively induced others to infringe the '281 Patent, in this district and elsewhere in the United States.

COUNT XIII
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,584,037
Under 35 U.S.C. § 271, et. seq.)

63. Rambus incorporates by reference and realleges paragraphs 1 through 62 above as though fully restated herein.

64. Upon information and belief, Defendants (1) have infringed and continue to infringe the '037 Patent by making, using, offering to sell, selling (directly or through

1 intermediaries), and importing, in this district and elsewhere in the United States, Accused
2 Products, and/or (2) have contributed to the infringement of the '037 Patent, and/or actively
3 induced others to infringe the '037 Patent, in this district and elsewhere in the United States.

4 **COUNT XIV**
5 **Against All Defendants**
6 **(Patent Infringement of U.S. Patent No. 6,697,295**
7 **Under 35 U.S.C. § 271, et. seq.)**

8 65. Rambus incorporates by reference and realleges paragraphs 1 through 64 above as
9 though fully restated herein.

10 66. Upon information and belief, Defendants (1) have infringed and continue to
11 infringe the '295 Patent by making, using, offering to sell, selling (directly or through
12 intermediaries), and importing, in this district and elsewhere in the United States, Accused
13 Products, and/or (2) have contributed to the infringement of the '295 Patent, and/or actively
14 induced others to infringe the '295 Patent, in this district and elsewhere in the United States.

15 **COUNT XV**
16 **Against All Defendants**
17 **(Patent Infringement of U.S. Patent No. 6,701,446**
18 **Under 35 U.S.C. § 271, et. seq.)**

19 67. Rambus incorporates by reference and realleges paragraphs 1 through 66 above as
20 though fully restated herein.

21 68. Upon information and belief, Defendants (1) have infringed and continue to
22 infringe the '1,446 Patent by making, using, offering to sell, selling (directly or through
23 intermediaries), and importing, in this district and elsewhere in the United States, Accused
24 Products, and/or (2) have contributed to the infringement of the '1,446 Patent, and/or actively
25 induced others to infringe the '1,446 Patent, in this district and elsewhere in the United States.
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COUNT XVI
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,715,020
Under 35 U.S.C. § 271, *et. seq.*)

69. Rambus incorporates by reference and realleges paragraphs 1 through 68 above as though fully restated herein.

70. Upon information and belief, Defendants (1) have infringed and continue to infringe the '5,020 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '5,020 Patent, and/or actively induced others to infringe the '5,020 Patent, in this district and elsewhere in the United States.

COUNT XVII
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,751,696
Under 35 U.S.C. § 271, *et. seq.*)

71. Rambus incorporates by reference and realleges paragraphs 1 through 70 above as though fully restated herein.

72. Upon information and belief, Defendants (1) have infringed and continue to infringe the '696 Patent by making, using, offering to sell, selling (directly or through intermediaries), and importing, in this district and elsewhere in the United States, Accused Products, and/or (2) have contributed to the infringement of the '696 Patent, and/or actively induced others to infringe the '696 Patent, in this district and elsewhere in the United States.

COUNT XVIII
Against All Defendants
(Patent Infringement of U.S. Patent No. 6,807,598
Under 35 U.S.C. § 271, *et. seq.*)

73. Rambus incorporates by reference and realleges paragraphs 1 through 72 above as though fully restated herein.

74. Upon information and belief, Defendants (1) have infringed and continue to infringe the '598 Patent by making, using, offering to sell, selling (directly or through

1 intermediaries), and importing, in this district and elsewhere in the United States, Accused
2 Products, and/or (2) have contributed to the infringement of the '598 Patent, and/or actively
3 induced others to infringe the '598 Patent, in this district and elsewhere in the United States.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Rambus asks this Court to enter judgment in its favor against Defendants
6 and grant the following relief:

7 A. An adjudication that Defendants have infringed and continue to infringe
8 the Rambus Patents as alleged above;

9 B. An accounting of all damages sustained by Rambus as a result of
10 Defendants' acts of infringement;

11 C. An award to Rambus of actual damages adequate to compensate Rambus
12 for Defendants' acts of patent infringement, together with prejudgment interest;

13 D. An award to Rambus of enhanced damages, up to and including trebling
14 of Rambus' damages pursuant to 35 U.S.C. § 284 for Defendants' willful infringement;

15 E. An award of Rambus' costs of suit and reasonable attorneys' fees pursuant
16 to 35 U.S.C. § 285 due to the exceptional nature of this case, or as otherwise permitted by law;

17 F. A grant of permanent injunction pursuant to 35 U.S.C. § 283, enjoining
18 Hynix, Samsung, Nanya, and Inotera, and each of their agents, servants, employees, principals,
19 officers, attorneys, successors, assignees, and all those in active concert or participation with
20 them, including related individuals and entities, customers, representatives, OEMs, dealers, and
21 distributors from further acts of (1) infringement, (2) contributory infringement, and (3) active
22 inducement to infringe with respect to the claims of the Patents Asserted Against Defendants;
23 and enjoining Nanya and Inotera, and each of their agents, servants, employees, principals,
24 officers, attorneys, successors, assignees, and all those in active concert or participation with
25 them, including related individuals and entities, customers, representatives, OEMs, dealers, and
26 distributors from further acts of (1) infringement, (2) contributory infringement, and (3) active
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1 inducement to infringe with respect to the claims of the Patents Asserted Against Nanya and
2 Inotera;

3 G. Any further relief that this Court deems just and proper.

4 Respectfully submitted,

5
6 DATED: June 6, 2005

DEWEY BALLANTINE LLP

7
8 By: /S/ _____
Jeannine Yoo Sano

9 Attorneys for Plaintiff
10 RAMBUS INC.

11
12
13 **DEMAND FOR A JURY TRIAL**

14 Pursuant to the provisions of Rule 38(b) of the Federal Rules of Civil Procedure and in
15 accordance with Civil Local Rule 3-6, Rambus demands a trial by jury of all issues so triable in
16 this matter.

17 Respectfully submitted,

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19 DATED: June 6, 2005

DEWEY BALLANTINE LLP

20
21 By: /S/ _____
Jeannine Yoo Sano

22 Attorneys for Plaintiff
23 RAMBUS INC.

DEWEY BALLANTINE LLP
1950 University Avenue, Suite 500
East Palo Alto, CA 94303-2225