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8 UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

MEJ

11 JAMES B. GOODMAN,  
12 Plaintiff,  
13 vs.  
14 ATMEL CORPORATION  
15 Defendant.

Civil Action No. 07-313

COMPLAINT FOR PATENT  
INFRINGEMENT AND DEMAND FOR  
JURY TRIAL

16  
17  
18 NOW COMES Plaintiff, JAMES B. GOODMAN ("Goodman"), through his attorneys,  
19 and files this Complaint for Patent Infringement and Demand for Jury Trial against ATMEL  
20 CORPORATION (ATMEL), and in support thereof Goodman states as follows:

21 **JURISDICTION**

22 1. This is an action for patent infringement of United States Patent No. 6,243,315  
23 (hereinafter "The '315 Patent") pursuant to the laws of the United States of America as set forth  
24 in Title 35 Sections 271 and 281 of the United States Code. This court has subject matter  
25 jurisdiction over this action pursuant to 28 U.S.C. Sec. 1338(a) and 28 U.S.C. Sec. 1331.

1 2. Venue is proper in this judicial district under 28 U.S.C. §§§ 1391(b), (c) and  
2 1400(b). On information and belief, Defendant ATMEL maintains a principal place of business  
3 at 2325 Orchard Parkway, San Jose, CA 95131.

4 3. Plaintiff Goodman is an individual residing in the State of Texas.

5 4. On information and belief, Defendant ATMEL maintains its corporate offices in  
6 San Jose, California.

7 **INTRADISTRICT ASSIGNMENT**

8 5. This is an action for Patent Infringement, which is an excepted category under  
9 Civil L.R. 3-2(c). Pursuant to Civil L.R. 3-2(c), this action is assigned on a district-wide basis.

10 **CAUSES OF ACTION FOR PATENT INFRINGEMENT**

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

14 7. Goodman is the sole owner of the '315 Patent, and has standing to bring this  
15 action.

16 **COUNT ONE**

17 8. Plaintiff, Goodman repeats and incorporates herein the allegations contained in  
18 paragraphs 1 through 7 above.

19 9. Defendant ATMEL is infringing, at least claim 1 of the '315 Patent by making,  
20 using, offering to sell and selling within the United States of America products incorporating  
21 PSRAM devices.

22 **JURY DEMAND**

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

25 **PRAYER FOR RELIEF**

26 WHEREFORE, Plaintiff respectfully requests this Court to:

- 27 a. enter judgment for Plaintiff on this Complaint;  
28 b. order that an accounting be had for the damages caused to the Plaintiff by the

1 infringing activities of the Defendant;

2 c. award Plaintiff interest and costs; and

3 d. award Plaintiff such other and further relief as this Court may deem just and  
4 equitable.

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THE PLAINTIFF  
JAMES B. GOODMAN



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