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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12	SILICONIX INCORPORATED, a Delaware)	CASE NO.
13	corporation,)	
)	
14	Plaintiff,)	COMPLAINT FOR PATENT
)	INFRINGEMENT
15	v.)	
)	DEMAND FOR JURY TRIAL
16	GENERAL SEMICONDUCTOR, INC., a)	
	Delaware corporation,)	
17)	
	Defendant.)	
18)	

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20 Plaintiff Siliconix incorporated (“Siliconix”) complains in this action against
21 Defendant General Semiconductor, Inc. (“General Semiconductor”) as follows:

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23 THE PARTIES
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25 1. Siliconix is a corporation in good standing incorporated under the laws of
26 the State of Delaware with its principal place of business in Santa Clara, California. Siliconix is
27 qualified and duly authorized to do business in the State of California. Siliconix is a leading
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1 7. Siliconix is the owner of all right, title, and interest in United States Letters
2 Patent No. 5,072,266 (the “266 Patent”), entitled “Trench DMOS Power Transistor With Field-
3 Shaping Body Profile and Three-Dimensional Geometry,” duly and legally issued by the United
4 States Patent and Trademark Office on December 10, 1991. A true and correct copy of the '266
5 Patent is attached to this Complaint as Exhibit A and is incorporated herein by this reference.

6 8. Siliconix is informed and believes and thereon alleges that General
7 Semiconductor has been and currently is infringing the '266 Patent by making, using, offering for
8 sale, and/or selling, without authorization or license, certain power MOSFET products that
9 incorporate the apparatus claimed in the '266 Patent, including without limitation the General
10 Semiconductor GF4420 product.

11 9. As a direct result of General Semiconductor's infringement of the '266
12 Patent, Siliconix has suffered damages in an amount not yet ascertained. Siliconix is entitled to
13 recover damages adequate to compensate Siliconix for General Semiconductor's infringement of
14 the '266 Patent in an amount to be determined at trial in an accounting, but in no event less than a
15 reasonable royalty.

16 10. As a direct result of General Semiconductor's infringement of the '266
17 Patent, Siliconix has suffered and will continue to suffer irreparable harm, including but not
18 limited to harm to its business reputation and goodwill. Siliconix is informed and believes and
19 thereon alleges that General Semiconductor threatens to continue to infringe the '266 Patent, and
20 unless restrained and enjoined, will do so. Siliconix's remedy at law is not by itself adequate to
21 compensate Siliconix for the harm inflicted and threatened by General Semiconductor.

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1 SECOND CLAIM FOR RELIEF

2 (Infringement of United States Letters Patent No. 5,298,442)

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4 11. Siliconix realleges and incorporates by reference paragraphs 1 through 5,
5 inclusive, as though fully set forth in this paragraph.

6 12. Siliconix is the owner of all right, title, and interest in United States Letters
7 Patent No. 5,298,442 (the “442 Patent”), entitled “Trench DMOS Power Transistor With Field-
8 Shaping Body Profile and Three-Dimensional Geometry,” duly and legally issued by the United
9 States Patent and Trademark Office on March 29, 1994. A true and correct copy of the '442
10 Patent is attached to this Complaint as Exhibit B and is incorporated herein by this reference.

11 13. Siliconix is informed and believes and thereon alleges that General
12 Semiconductor has been and currently is infringing the '442 Patent by making, using, offering for
13 sale, and/or selling, without authorization or license, certain power MOSFET products that are
14 made with and/or incorporate the methods claimed in the '442 Patent, including without
15 limitation the General Semiconductor GF4420 product.

16 14. As a direct result of General Semiconductor's infringement of the '442
17 Patent, Siliconix has suffered damages in an amount not yet ascertained. Siliconix is entitled to
18 recover damages adequate to compensate Siliconix for General Semiconductor's infringement of
19 the '442 Patent in an amount to be determined at trial in an accounting, but in no event less than a
20 reasonable royalty.

21 15. As a direct result of General Semiconductor's infringement of the '442
22 Patent, Siliconix has suffered and will continue to suffer irreparable harm, including but not
23 limited to harm to its business reputation and goodwill. Siliconix is informed and believes and
24 thereon alleges that General Semiconductor threatens to continue to infringe the '442 Patent, and
25 unless restrained and enjoined, will do so. Siliconix's remedy at law is not by itself adequate to
26 compensate Siliconix for the harm inflicted and threatened by General Semiconductor.

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28 PRAYER FOR RELIEF

1 WHEREFORE, Siliconix prays for judgment against General Semiconductor as
2 follows:

3 1. For a declaration that United States Letters Patent Nos. 5,072,266 and
4 5,298,442 are not invalid, not unenforceable, and have been infringed by General Semiconductor;

5 2. For an award to Siliconix of damages adequate to compensate Siliconix for
6 General Semiconductor's infringement of United States Letters Patent Nos. 5,072,266 and
7 5,298,442, but in no event less than a reasonable royalty;

8 3. For an award to Siliconix of costs, prejudgment interest, and post-
9 judgment interest;

10 4. For an entry of preliminary and permanent injunctive relief enjoining and
11 restraining General Semiconductor, its officers, directors, agents, servants, employees, and all
12 other persons in privity or acting in concert with it who receive actual notice of the order by
13 personal service or otherwise, from further infringement of United States Letters Patent Nos.
14 5,072,266 and 5,298,442; and

15 5. For an award to Siliconix of such other and further relief as this Court
16 deems just and proper.

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18 DATED: April 25, 2001

19 QUINN EMANUEL URQUHART
20 OLIVER & HEDGES, LLP

21
22 By _____
23 David Eiseman
24 Attorneys for Plaintiff
25 Siliconix incorporated
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DEMAND FOR JURY TRIAL

In accordance with Fed. R. Civ. P. 38(b), Plaintiff Siliconix incorporated demands a trial by jury on all issues triable by a jury.

DATED: April 25, 2001

QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP

By _____
David Eiseman
Attorneys for Plaintiff
Siliconix incorporated

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