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12 MENTOR GRAPHICS CORPORATION

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

16  
17 MENTOR GRAPHICS CORPORATION, an  
Oregon Corporation,

18 Plaintiff,

19 v.

20 QUICKTURN DESIGN SYSTEMS, INC., a  
21 Delaware Corporation, and CADENCE  
DESIGN SYSTEMS, INC., a Delaware  
22 Corporation,

23 Defendants.  
24  
25  
26  
27  
28

CASE NO.

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff Mentor Graphics Corporation (“Mentor”) alleges for its complaint aga inst  
3 defendants Quickturn Design Systems, Inc. (“Quickturn”) and Cadence Design Systems, Inc.  
4 (“Cadence”) as follows:

5 **JURISDICTION AND VENUE**

6 1. This is an action for patent infringement arising under the Patent Laws of the  
7 United States. This Court has jurisdiction pursuant to 28 U.S.C. § 1338. Venue is proper in this  
8 district under 28 U.S.C. §§ 1391 (b) and 1400(b).

9 **INTRADISTRICT ASSIGNMENT**

10 2. Because three related cases (*Mentor Graphics Corporation v. Quickturn Design*  
11 *Systems, Inc. and Cadence Design Systems, Inc.*, Civil Action No. C-99-05464; *Mentor Graphics*  
12 *Corporation, et al. v. Quickturn Design Systems, et al.*, Civil Action No. C-00-01030; and  
13 *Mentor Graphics Corporation, et al. v. Quickturn Design Systems, et al.*, Civil Action No. C-00-  
14 3291) are currently pending before the San Francisco Division of this Court (Hon. Susan Illston),  
15 this action should be assigned to that division.

16 **PARTIES**

17 3. Mentor Graphics Corporation (“Mentor”) is an Oregon corporation organized  
18 under the laws of the State of Oregon having its principal executive offices in Wilsonville,  
19 Oregon.

20 4. Quickturn is a Delaware corporation organized under the laws of the State of  
21 Delaware having its principal executive offices in San Jose, California. Cadence is a Delaware  
22 corporation with its headquarters in Mountain View, California. In other actions between  
23 Cadence and Mentor, Cadence has asserted that it fully controls and operates the business of  
24 Quickturn, and that Quickturn, the corporation, is essentially a shell.

25 **PATENTS**

26 5. On July 7, 1998, United States Patent No. 5,777,489, entitled “FIELD  
27 PROGRAMMABLE GATE ARRAY WITH INTEGRATED DEBUGGING FACILITIES” (the  
28 “489 patent”), issued to Assignee Mentor Graphics Corporation. Mentor is the owner of the

1 '489 patent with full rights to sue for infringement of the '489 patent, including rights to sue for  
2 past infringement. The '489 patent is attached hereto as Exhibit A.

### 3 **THE INFRINGEMENT**

4 6. Cadence and Quickturn have been and still are infringing claims 14 and 15 of the  
5 '489 patent by making, selling, offering to sell, and using hardware emulation systems  
6 embodying the patented inventions, which in the United States are identified by the trade name  
7 Mercury™. Cadence and Quickturn will continue to make, use and sell the Mercury™ system in  
8 the United States unless enjoined by this Court.

9 7. Mentor has been damaged by Cadence and Quickturn's infringing activities and  
10 will be irreparably injured by Cadence and Quickturn's continued infringement, unless Cadence  
11 and Quickturn are enjoined by this Court. Defendants' infringement of claims 14 and 15 of the  
12 '489 patent is and has been willful and deliberate, as Defendants have committed the acts alleged  
13 with previous notice and knowledge of Mentor's patents.

### 14 **RELIEF REQUESTED**

15 WHEREFORE, PLAINTIFF PRAYS THAT:

16 1. Cadence and Quickturn be adjudged and decreed to have infringed claims 14 and  
17 15 of the '489 patent;

18 2. Cadence and Quickturn, and their officers, directors, employees, agents, licensees,  
19 servants, successors and assigns, and any and all persons acting in privity or concert with them,  
20 be permanently and preliminarily restrained and enjoined from further infringement, contributory  
21 infringement or inducement of infringement of claims 14 and 15 of the '489 patent;

22 3. Cadence and Quickturn be ordered to pay damages adequate to compensate  
23 Mentor for Cadence and Quickturn's past infringement, together with prejudgment interest, and  
24 that such damages be trebled pursuant to 35 U.S.C. § 284 because of the willful and deliberate  
25 character of the infringement;

26 4. Mentor be awarded its costs and attorneys' fees; and

27 5. Mentor be awarded such other and further relief as the Court deems just and  
28 proper.

**DEMAND FOR JURY TRIAL**

Plaintiff Mentor Graphics Corporation hereby demands trial by jury as to all issues in this action triable by a jury.

**CERTIFICATION OF INTERESTED ENTITIES OR PERSONS**

Pursuant to Civil L.R. 3-16, the undersigned certifies that as of this date, other than the named parties, there is no such interest to report.

Dated: March 25, 2002

LATHAM & WATKINS

By /s/Allon Stabinsky\_\_\_\_\_  
Allon Stabinsky  
Attorneys for Plaintiff  
MENTOR GRAPHICS CORPORATION,