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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JAMES B. GOODMAN,  
Plaintiff,  
vs.  
FUJITSU LIMITED  
Defendant.

Civil Action No. 08-10773 DLC

**ECF CASE**

**COMPLAINT FOR PATENT  
INFRINGEMENT AND DEMAND FOR  
JURY TRIAL**

NOW COMES Plaintiff, JAMES B. GOODMAN (“Goodman”), through his attorneys,  
and files this Complaint for Patent Infringement and Demand for Jury Trial against FUJITSU  
LIMITED and in support thereof Goodman states as follows:

**PARTIES IN THIS COMPLAINT**

The Plaintiff is:

James B. Goodman  
2535 Hillsboro Avenue  
Dallas, TX 75228  
Tel.: 214 328-1769

1 The Defendant is:

2 Fujitsu Limited  
3 Shiodome City Center  
4 1-5-2 Higashi-Shimbashi, Minato-ku  
5 Tokyo, 105-7123 Japan  
6 Having a New York Representative Office at  
7 733 Third Avenue  
8 New York, NY 10017

9 **JURISDICTION**

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

14 2. On information and belief, the Defendant Fujitsu Limited, a Japanese corporation,  
15 maintains a representative office in New York City and is doing business in the County of New  
16 York, and the State of New York for many semiconductor products including the infringing  
17 products. On information and belief, the Defendant Fujitsu Limited is doing over \$2.5 billion in  
18 its semiconductor business world wide. Thus, venue is proper in this judicial district under 28  
19 U.S.C. §§ 1391(b), (c) and 1400(b).

20 **CAUSE OF ACTION FOR PATENT INFRINGEMENT**

21 3. On June 5, 2001, the ‘315 Patent entitled “COMPUTER MEMORY SYSTEM  
22 WITH A LOW POWER MODE”, was duly and legally issued to James B. Goodman, as the sole  
23 patentee.

24 4. Plaintiff Goodman is the sole owner of the ‘315 Patent, and has standing to bring  
25 this action.

1 **COUNT ONE**

2 5. Plaintiff, Goodman repeats and incorporates herein the allegations contained in  
3 paragraphs 1 through 4 above.

4 6. Defendant Fujitsu Limited is infringing, at least claim 1 of the '315 Patent  
5 by using, offering to sell and selling within the United States of America PSRAM devices  
6 including a class of products termed "Mobile FCRAM" by the Defendant.

7 **JURY DEMAND**

8 7. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues  
9 in this lawsuit.

10 **PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiff respectfully requests this Court to:

- 12 a. enter judgment for Plaintiff on this Complaint;  
13 b. order that an accounting be had for the damages caused to the Plaintiff by the  
14 infringing activities of the Defendant;  
15 c. award Plaintiff interest and costs; and  
16 d. award Plaintiff such other and further relief as this Court may deem just and  
17 equitable.

18 THE PLAINTIFF  
19 JAMES B. GOODMAN

20  
21  
22 David Fink  
23 Fink & Johnson  
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Attorney for the Plaintiff