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RICHARD W. WILKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

RS

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JAMES B. GOODMAN,  
Plaintiff,  
vs.  
NUMONYX B. V.  
Defendant.

CV 09 2170  
Civil Action No.

COMPLAINT FOR PATENT  
INFRINGEMENT AND DEMAND FOR  
JURY TRIAL

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

JURISDICTION

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1. This is an action for patent infringement of United States Patent No. 6,243,315  
(hereinafter "The '315 Patent") pursuant to the laws of the United States of America as set forth  
in Title 35 Sections 271 and 281 of the United States Code. This court has subject matter  
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).

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

4 4. On information and belief, Defendant NUMONYX has a manufacturing and R &  
5 D Facility at 3601 Juliette Lane., Santa Clara, CA 95054-1579.

6 **INTRADISTRICT ASSIGNMENT**

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

9 **CAUSES OF ACTION FOR PATENT INFRINGEMENT**

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

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

15 **COUNT ONE**

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

18 9. Defendant NUMONYX is infringing, at least claim 1 of the '315 Patent by using,  
19 offering to sell and selling within the United States of America PSRAM devices such as  
20 M36P0R8070E0, M36P0R9060E0, M36P0R9060N0, M36L0RX0X0UL3, M36L0R7060T1,  
21 M36L0R7060B1, M36L0T7050T2, M36L0T7050B2, M36W0R5040T5, M36W0R5040B5, and  
22 W18SCSP which, on information and belief, are capable of standby mode with automatic partial  
23 array self refresh with the address and control lines set "high", and include upper and lower  
24 memories.

25 **JURY DEMAND**

26 10. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues  
27 in this lawsuit.  
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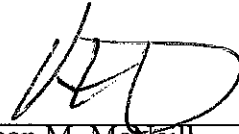
**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests this Court to:

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

THE PLAINTIFF  
JAMES B. GOODMAN

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