



**THE PARTIES**

3. Plaintiff is a limited liability company, organized and existing under the laws of Texas with its principal place of business in Frisco, Texas.

4. Upon information and belief, Defendant Lenovo (United States), Inc. (“Lenovo”) is a corporation organized and existing under the laws of the state of Delaware. Upon information and belief, Lenovo’s principal place of business is located in Morrisville, North Carolina. Lenovo may be served through its registered agent for service of process, may be served through its registered agent for service of process, The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware.

**JURISDICTION AND VENUE**

5. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and/or 1338.

6. This Court has personal jurisdiction over the Defendant. Defendant is organized and existing as a corporation under the laws of the state of Delaware. Defendant has conducted and does conduct business within the State of Delaware, including within this District.

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and/or 1400.

**OPERATIVE FACTS**

**THE PATENT-IN-SUIT**

8. Optimum Power is the owner by assignment of all right, title, and interest in the ‘784 Patent.

9. The '784 Patent describes a novel method that dynamically manages power supplied to solid-state memory. Among other things, the '784 Patent discloses a power management device and related logic control circuitry that supplies variable voltage to solid-state memory devices. The device provides sufficient power to maintain memory information during periods of no activity or standby periods, and an increased level of power during periods of data access activity or memory access periods, thereby reducing substantially the power consumption of solid-state memory devices.

10. Claim 1 of the '784 Patent provides:

1. A dynamic power management device for supplying power to a solid-state memory integrated circuit, said device comprising:  
power control means for supplying variable voltage to said memory integrated circuit; and  
logic control means for generating address and control signals for said memory integrated circuit  
and for controlling said power control means  
wherein the power control means supply power to said memory integrated circuit, said power being supplied to the memory integrated circuit at a first variable voltage level during periods of no data activity and at a second variable voltage level during periods of data access activity, the variable voltage supplied at said first variable voltage level being less than the variable voltage being supplied at said second variable voltage level,  
wherein the power supplied at the first level is sufficient to preserve information stored in the integrated memory circuit and the power supplied at the second level is sufficient to read and write information in the integrated memory circuit.

'784 Patent, Col. 7, ll. 2-22.

THE INFRINGING PRODUCTS

11. Defendant Lenovo, within the United States, manufactures, uses, offers for sale, or sells computers, including, but not limited to, the Lenovo ThinkPad T500 with an Intel Core 2 Duo CPU (P8600) 2.4GHz with a 3MB L2 cache (collectively, the “Lenovo Computers”) that, among other things, utilize a dynamic power management device that supplies variable voltage to solid-state memory devices, such that sufficient power is provided to maintain memory information during standby periods and an increased level of power is supplied during memory access periods, thereby reducing substantially the power consumption of the solid-state memory devices.

12. The Lenovo Computers contain each limitation set forth in at least claim 1 of the ‘784 Patent.

13. Defendant Lenovo does not have a license or other authorization to practice the claims set forth in the ‘784 Patent.

14. All conditions precedent to the assertion of the claims set forth in this Complaint have been satisfied or waived.

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COUNT ONE

LENOVO’S INFRINGEMENT OF THE ‘784 PATENT

15. Optimum Power incorporates by reference as if fully set forth herein the averments contained within Paragraphs 1-14, above.

16. By reason of some or all of the foregoing, Defendant Lenovo has infringed at least one claim of the ‘784 Patent.

17. Optimum Power has suffered damages as the direct and proximate result of Defendant Lenovo's infringement of the '784 Patent.

WHEREFORE, Optimum Power prays that this Court:

- (1) Enter judgment in favor of Optimum Power and against Defendant Lenovo for infringement of the '784 Patent;
- (2) Award damages to Optimum Power in an amount to be proven at trial for infringement of the '784 Patent, pursuant to 35 U.S.C. § 284, including pre-judgment and post-judgment interest along with the cost of this action;
- (3) Try this case before a jury; and
- (4) Grant Optimum Power such other and further relief as the Court deems just and proper, premises considered.

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