IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOFTVAULT SYSTEMS, INC.	§	
	§	
Plaintiff,	§	
vs.	§	
	§	Civil Action No. 2:10-cv-219
INTEL CORPORATION,	§	
GOOD TECHNOLOGY, INC.,	§	
NOTIFY TECHNOLOGY	§	
CORPORATION, and	§	
SOFTEX INCORPORATED,	§	
	§	
Defendants.	§	

Plaintiff SoftVault Systems, Inc. ("SoftVault") brings this action against Defendants Intel Corporation ("Intel"), Good Technology, Inc. ("Good"), Notify Technology Corporation ("Notify"), and Softex Incorporated ("Softex"), and for its causes of action alleges:

The Parties

1.   SoftVault is a corporation organized and existing under the laws of the State of Washington with its principle place of business in the State of Washington.

2.   Upon information and belief, Intel is a corporation organized and existing under the laws of the State of Delaware and is doing business in this judicial district and elsewhere. Intel may be served with process by serving its registered agent, CT Corporation System at 350 N Saint Paul Street, Suite 2900, Dallas, Texas 75201-4234.

3.   Upon information and belief, Good is a corporation organized and existing under the laws of the State of Delaware and is doing business in this judicial district

and elsewhere. Good may be served with process by serving its registered agent, CT Corporation System at 350 N Saint Paul Street, Suite 2900, Dallas, Texas 75201-4234.

4.   Upon information and belief, Notify is a corporation organized and existing under the laws of the State of California and is doing business in this judicial district and elsewhere. Notify may be served with process by serving its registered agent, Paul DePond at 1054 South De Anza Boulevard, Suite 202, San Jose, California 95129.

5.   Upon information and belief, Softex is a corporation organized and existing under the laws of the State of Texas and is doing business in this judicial district and elsewhere. Softex may be served with process by serving its registered agent, Apurva Bhansali at 9300 Jolleyville Road, Suite 201, Austin, Texas 78759.

Jurisdiction and Venue

6.   This action arises under the patent laws of the United States, Title 35 United States Code, particularly §§ 271 and 281 and Title 28 United States Code, particularly §1338(a). Venue is proper in this Court under Title 28 United States Code §§ 1391(b) and (c) and 1400(b).

Claims for Patent Infringement

7.   On June 19, 2001, U.S. Patent No. 6,249,868 ("the '868 patent") was duly and legally issued for "Method and System for Embedded, Automated, Component-level Control of Computer Systems and Other Complex Systems". A copy of the '868 patent is attached as Exhibit A and is made a part hereof. By assignment,

SoftVault is the owner of the '868 patent and at all relevant times has had the right to enforce the '868 patent.

8.   On July 15, 2003 U.S. Patent No. 6,594,765 ("the '765 patent") was duly and legally issued for "Method and System for Embedded, Automated, Component-level Control of Computer Systems and Other Complex Systems". A copy of the '765 patent is attached as Exhibit B and is made a part hereof. By assignment, SoftVault is the owner of the '765 patent and at all relevant times has had the right to enforce the '765 patent.

9.   The '868 and '765 patents, in general, relate to a method and system of protecting an electronic device, such as a computer system, or its components, software or otherwise. Specifically, certain claims of the '868 and '765 patents relate to enabling or disabling a system component involving an authorization process with a remote server.

10.   On information and belief, Intel provides software and hardware which includes the ability to enable or disable operation of components of a device through an authorization process with a remote server. Products having this feature include at least its Anti-Theft Technology (AT-p). By providing such products, Intel has in the past and continues to infringe directly, by inducement, or by contributing to the infringement of the '868 patent, including but not limited to claim 1 and the '765 patent, including but not limited to claim 9.

11.   On information and belief, Good provides software which includes the ability to enable or disable operation of components of a device through an authorization process with a remote server. Products having this feature include at

least its Wireless Handheld Computing System. By providing such products, Good has in the past and continues to infringe directly, by inducement, or by contributing to the infringement of the '868 patent, including but not limited to claim 1 and the '765 patent, including but not limited to claim 9.

12.   On information and belief, Notify provides software which includes the ability to enable or disable operation of components of a device through an authorization process with a remote server. Products having this feature include at least the NotifyLink system. By providing such products, Notify has in the past and continues to infringe directly, by inducement, or by contributing to the infringement of the '868 patent, including but not limited to claim 1 and the '765 patent, including but not limited to claim 9.

13.   On information and belief, Softex provides software which includes the ability to enable or disable operation of components of a device through an authorization process with a remote server. Products having this feature include at least the TheftGuard system. By providing such products, Softex has in the past and continues to infringe directly, by inducement, or by contributing to the infringement of the '868 patent, including but not limited to claim 1 and the '765 patent, including but not limited to claim 9.

14.   As a result of Defendants' infringing conduct, Defendants have damaged SoftVault.   Defendants are liable to SoftVault in an amount that adequately compensates SoftVault for their infringement, which by law in no event can be less than a reasonable royalty.

Demand for Jury Trial

13.   SoftVault demands a jury trial on all claims and issues.

Prayer For Relief

WHEREFORE, SoftVault prays for entry of judgment:

A.   That claim 1 of U.S. Patent No. 6,249,868 and claim 9 of U.S. Patent No. 6,594,765 have been infringed by Defendants and by others whose infringement has been contributed to and/or induced by Defendants;

B.   That Defendants account for and pay to SoftVault all damages and costs caused by Defendants' activities complained of herein;

C.   That SoftVault be granted pre-judgment and post-judgment interest on the damages caused by reason of Defendants' activity complained of herein;

D.   That SoftVault be granted its attorneys' fees in this action;

E.   That costs be awarded to SoftVault; and

F.   That SoftVault be granted such other and further relief that is just and proper under the circumstances.

Respectfully submitted,

Dated: July 1, 2010   /s/ Edward W. Goldstein

                              Edward W. Goldstein
                              Texas Bar No. 08099500
                              Corby R. Vowell
                              Texas Bar No. 24031621
                              GOLDSTEIN, FAUCETT & PREBEG, L.L.P.
                              1177 West Loop South, Suite 400
                              Houston, Texas 77027
                              (713) 877-1515 – Telephone
                              (713) 877-1145 – Facsimile
                              egoldstein@gfpiplaw.com

cvowell@gfpiplaw.com

ATTORNEYS FOR PLAINTIFF