

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JAMES B. GOODMAN

Plaintiff,

v.

**HYNIX SEMICONDUCTOR AMERICA,
INC.**

Defendant.

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CIVIL ACTION NO.

JURY TRIAL DEMANDED

**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 HYNIX SEMICONDUCTOR AMERICA, INC. (“HYNIX”), and in support thereof Goodman states as follows:

JURISDICTION

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.

2. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b), (c) and 1400(b). On information and belief, Defendant HYNIX maintains an office at 20405 State Hwy. 249, Suite 460, Houston, TX 77070 and is engaged in infringing activities in this judicial district.

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

CAUSES OF ACTION FOR PATENT INFRINGEMENT

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

5. Goodman is the sole owner of the '315 Patent, and has standing to bring this action.

COUNT ONE

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

7. Defendant HYNIX is infringing, at least claim 1 of the '315 Patent by offering for sale, and selling within the United States of America infringing computer memory products including its line of Mobile SDR, memory products.

8. Upon information and belief, HYNIX offers for sale and sells a memory system called Mobile SDR for use in a computer system including the following products:

HY5S5B6ELF-HE, HY5S5B6ELF-SE, HY5S5B6ELFP-HE, HY5S5B6ELFP-SE, HY5S7B6LF-H, HY5S7B6LF-S, HY5S7B6LFP-H, HY5S7B6LFP-S, HY5S7B2LF-H, HY5S7B2LF-S, HY5S7B2LFP-H, HY5S7B2LFF-S, ("the Mobile SDR").

9. Upon information and belief, the Mobile SDR has four banks of volatile solid state memory arrays that retain information when an electrical power source is applied to them within a predetermined voltage range. The Mobile SDR is capable of implementing an automatic self-refresh mode within each of the four banks. The Mobile SDR has address lines and control lines.

10. Upon information and belief, the Mobile SDR has a control logic sub-system that is able to selectively electrically isolate the device's address lines and respective control lines so that signals are ignored or go unnoticed. For example, according to the datasheet entitled "4Bank x 4M x 16bits Synchronous DRAM", the chip select features is described as disables all inputs except CLK, CKE, UDQM and LDQM. Moreover, when the CKE input is set to Low all commands, inputs and outputs are set such that they do not influence the operation of the device.

11. Upon information and belief, when a deselect signal is detected or the CKE is set to Low a determination is made by a sub-system of the control logic to that the device is idle and not being accessed. The memory is then placed in Self Refresh mode with the control inputs, and address lines set to a state that will not influence the operation of the device.

COUNT TWO

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

13. Defendant HYNIX is infringing, at least claim 1 of the '315 Patent by offering for sale, and selling within the United States of America infringing computer memory products including its line of Mobile DDR, memory products.

14. Upon information and belief, HYNIX offers for sale and sells a memory system called Mobile DDR for use in a computer system including the following products:

HY5MS5B6LF-H, HY5MS5B6LF-S, HY5MS5B6LFP-H, HY5MS5B6LFP-S, HY5MS7B6LF-H, HY5MS7B6LF-S, HY5MS7B6LFP-H, HY5MS7B6LFP-S, HY5MS7B2LF-H, HY5MS7B2LF-S, HY5MS7B2LFP-H, HY5MS7B2LFP-S (“the Mobile DDR”).

15. Upon information and belief, the Mobile DDR has four banks of volatile solid state memory arrays that retain information when an electrical power source is applied to them within a predetermined voltage range. These Mobile DDR is capable of implementing an automatic self-refresh mode within each of these banks. The Mobile DDR has address lines and control lines.

16. Upon information and belief, the Mobile DDR has a control logic sub-system that is able to selectively electrically isolate the device’s address lines and respective control lines so that signals are ignored or go unnoticed. For example, according to the datasheet entitled “256MBit (4Bank x 4M x 16bits) MOBILE DDR SDRAM Memory”, the chip select disables all inputs except CLK, CKE, UDQM and LDQM and disables the command decoder. Moreover, when the CKE input is set to Low all commands, inputs and outputs are set such that they do not influence the operation of the device.

17. Upon information and belief, when a deselect signal is detected or the CKE is set to Low a determination is made by a sub-system of the control logic to that the device is idle and not being accessed. The memory is then placed in Self Refresh mode with the control inputs, and address lines set to a state that will not influence the operation of the device.

COUNT THREE

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

19. Defendant HYNIX is infringing, at least claim 1 of the '315 Patent by offering for sale, and selling within the United States of America infringing computer memory products including its line of Mobile PSRAM, memory products.

20. Upon information and belief, HYNIX offers for sale and sells a memory system called Mobile PSRAM for use in a computer system including the following product: HY64SD16645M ("the Mobile PSRAM").

21. Upon information and belief, the Mobile PSRAM memory system is made up of a memory that is subdivided into four logical sub-parts that can be selectively identified for refresh operations during self-refresh. This feature is identified as the partial-array refresh. The system retains information when an electrical power source is applied to it within a predetermined voltage range. The each subpart of the PSRAM memory is a memory array. The Mobile PSRAM device is capable of implementing an automatic self-refresh mode and has address lines and control lines.

22. Upon information and belief, The Mobile PSRAM product has a control logic sub-system that is able to selectively render the Mobile PSRAM's address lines and respective control lines as ignored or ineffective. When the command decoder is disabled new commands are not acted upon and outputs are forced to high-Z. The DESELECT function prevents new commands from being executed by the Mobile PSRAM. The Mobile PSRAM is effectively

deselected. I/O signals are put to high impedance state.

23. Upon information and belief, when a signal on the chip select line(s) is detected a determination is made by a sub-system of the control logic to place the Mobile PSRAM system in a self-refresh or standby power mode. The command decoder is disabled and new commands are ineffective, signals on the address lines are ineffective and outputs are forced to high impedance. The Mobile PSRAM is placed in self-refresh or standby power mode and the Mobile PSRAM's automatic self-refresh are autonomously scheduled and performed, thereby reducing the amount of electrical energy being drawn from an electrical power supply for the computer system.

JURY DEMAND

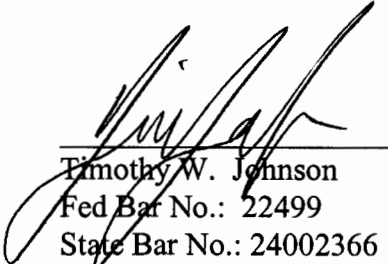
24. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues in this lawsuit.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court to:

- a. enter judgment for Plaintiff on this Complaint;
- b. enter a permanent injunction to enjoin the Defendant and those in privity with or acting in concert with Defendant from further infringement of the '315 Patent during the remainder of the term for which the patent has been granted;
- c. order that an accounting be had for the damages caused to the Plaintiff by the infringing activities of the Defendant;
- d. award Plaintiff interest and costs; and
- e. award Plaintiff such other and further relief as this Court may deem just and equitable.

Respectfully submitted,



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