

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

CONVERSANT INTELLECTUAL )  
PROPERTY MANAGEMENT, INC., )  
CONVERSANT IP NB 868 INC. )

Plaintiffs,

 $\mathbf{V}_i$ 

SAMSUNG ELECTRONICS )  
CO., LTD., SAMSUNG )  
ELECTRONICS )  
AMERICA, INC., SAMSUNG )  
TELECOMMUNICATIONS )  
AMERICA, LLC, SAMSUNG )  
SEMICONDUCTOR, INC., )  
SAMSUNG AUSTIN )  
SEMICONDUCTOR, LLC )

Defendants.

CASE NO. 2:15-cv-281

## JURY TRIAL DEMANDED

## COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Conversant Intellectual Property Management, Inc. and Conversant IP NB 868 Inc. (collectively “Conversant”), for their cause of action against Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications America, LLC, Samsung Semiconductor, Inc. and Samsung Austin Semiconductor, LLC (collectively “Samsung”), states and alleges on knowledge, information and belief as follows:

## PARTIES

1. Plaintiff Conversant Intellectual Property Management, Inc. (“Conversant IP Management”) is a corporation subject to the laws of Canada with its principal place of business at 390 March Road, Suite 100, Ottawa ON, Canada K2K 0G7. Conversant IP Management’s

United States principal place of business is located at 5601 Granite Parkway Suite 1300 Plano, Texas 75024, which is also the sole location of its U.S. operating subsidiary, Conversant Intellectual Property Management Corp.

2. Plaintiff Conversant IP NB 868 Inc. (“NB”) is a corporation subject to the laws of Canada with its principal place of business at 44 Chipman Hill, Suite 1000, Saint John, New Brunswick E2L 2A9, Canada. NB is a wholly-owned subsidiary of Conversant IP Management.

3. Joinder of Conversant IP Management and NB as plaintiffs is proper under Federal Rule of Civil Procedure Rule 20(a)(1) as each plaintiff asserts a right to relief jointly, severally, or in the alternative with respect to the sale of the accused products, including, but not limited to, Samsung’s Apple A7 APL0698, A5 APL2498, and A5 SoC processor integrated circuits and similar integrated circuits, and because questions of law or fact common to both plaintiffs will arise in the action with respect to, by way of non-limiting examples, the sales of the accused products by Samsung, including, but not limited to, Samsung’s Apple A7 APL0698, A5 APL2498, and A5 SOC processor integrated circuits and similar integrated circuits, licenses entered into by Conversant and Samsung as to each other as well as other parties, and other anticipated overlapping claims and defenses.

4. On information and belief, Defendant Samsung Electronics Co., Ltd. (“SEC”) is a foreign corporation organized and existing under the laws of Korea, with its principal place of business located at 129, Samsung-ro, Yeongtong-gu, Suwon-city, Gyeonggi-do, Korea.

5. Upon information and belief, Defendant SEC is the parent corporation of Defendants Samsung Electronics America, Inc. (“SEA”), Samsung Telecommunications America, LLC, (“STA”), Samsung Semiconductor, Inc. (“SSI”), and Samsung Austin Semiconductor, LLC (“SAS”), each of which are responsible for specific activities within the

United States related to the operations of Defendant SEC's sale, marketing and support of accused products, which include, but are not limited to, integrated circuits that incorporate Conversant's patented devices, methods and processes, that are developed, manufactured, imported and/or sold in the United States without the authorization of Conversant IP Management or NB.

6. Upon information and belief, Defendant SEA is a wholly-owned subsidiary of Defendant SEC. SEA is a corporation organized and existing under the laws of the State of New York, with its principal place of business located at 85 Challenger Road, Ridgefield Park, New Jersey 07660. Upon information and belief, Defendant SEA is the managing entity that oversees the North American operations of Defendant STA. Upon information and belief, Defendant SEA is involved in the development, manufacture, import and/or sale of certain accused products without Conversant IP Management's or NB's authorization.

7. Upon information and belief, Defendant STA is a subsidiary of SEC and SEA. Upon information and belief, STA is a limited liability company organized and existing under the laws of the state of Delaware, with its principal place of business located at 1301 Lookout Drive, Richardson, Texas 75802. Upon information and belief, Defendant STA is involved in the development, manufacture, import and/or sale of certain accused products without Conversant IP Management's or NB's authorization.

8. Upon information and belief, Defendant SSI is a wholly-owned subsidiary of SEC. Upon information and belief, Defendant SSI is a corporation organized and existing under the laws of the state of California, with its principal place of business located at 3655 N. First Street, San Jose, CA 95134. Upon information and belief, Defendant SSI is involved in the

development, manufacture, import and/or sale of certain accused products without Conversant IP Management or NB's authorization.

9. Upon information and belief, Defendant SAS is a wholly-owned subsidiary of SEC. Upon information and belief, Defendant SAS is a limited liability company organized and existing under the laws of the state of Delaware, with its principal place of business located at 12100 Samsung Blvd., Suite 100, Austin, Texas 78754-1902. Upon information and belief, Defendant SAS is involved in the development, manufacture, import and/or sale of certain accused products without Conversant IP Management or NB's authorization.

### **JURISDICTION AND VENUE**

10. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a), in that this action arises under the federal patent statutes, 35 U.S.C. §§ 271 and 281-85.

11. This Court has personal jurisdiction over Defendant SEC in this action because SEC has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over SEC would not offend traditional notions of fair play and substantial justice. Defendant SEC, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), has committed and continues to commit acts of infringement in this District by among other things offering to sell and selling products that infringe the Asserted Patents (defined below).

12. This Court has personal jurisdiction over Defendant STA in this action because STA has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over STA would not offend traditional notions of fair play and substantial justice. Defendant STA, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), has

committed and continues to commit acts of infringement in this District by offering to sell and selling products that infringe the Asserted Patents (defined below). Moreover, Defendant STA has a principal place of business in Texas and is registered to do business in Texas with the Texas Secretary of State. STA designated The Corporation Service Company, 211 East 7th Street, Suite 620, Austin, Texas 78701, as its registered agent.

13. This Court has personal jurisdiction over Defendant SEA in this action because SEA has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over SEA would not offend traditional notions of fair play and substantial justice. Defendant SEA, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), has committed and continues to commit acts of infringement in this District by among other things offering to sell and selling products that infringe the asserted patents. SEA has also been authorized to do business in the State of Texas by the Texas Secretary of State. Further, SEA designated CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201, as its registered agent.

14. This Court has personal jurisdiction over Defendant SSI in this action because SSI has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over SSI would not offend traditional notions of fair play and substantial justice. Defendant SSI, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), has committed and continues to commit acts of infringement in this District by among other things offering to sell and selling products that infringe the asserted patents. SSI has also been authorized to do business in the State of Texas by the Texas Secretary of State. Further, SSI

designated CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201, as its registered agent.

15. This Court has personal jurisdiction over Defendant SAS in this action because SAS has committed acts within the Eastern District of Texas giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over SAS would not offend traditional notions of fair play and substantial justice. Defendant SAS, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), has committed and continues to commit acts of infringement in this District by among other things offering to sell and selling products that infringe the asserted patents. SAS has also been authorized to do business in the State of Texas by the Texas Secretary of State. Further, SAS designated CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201, as its registered agent.

16. Venue in the Eastern District of Texas is proper pursuant to 28 U.S.C. §§ 1391(b) and (c) and 1400(b) because this District is the principal and sole place of operations of Conversant in the United States and because Samsung has committed acts of direct and indirect infringement within this judicial district giving rise to this action, and Samsung has and continues to conduct business in the Eastern District of Texas and has transacted business in the Eastern District of Texas.

#### **ASSERTED PATENTS**

17. This infringement action arises in connection with 15 United States patents, herein “the Asserted Patents.” The Asserted Patents are United States Patent Nos. 6,223,331; 7,915,933; 7,940,081; 7,945,885; 7,982,532; 7,996,811; and 8,253,438 (collectively, the “Conversant IP Management Patents”); and United States Patent Nos. RE44,218; 5,796,675;

6,107,138; 6,209,056; 6,306,743; 6,313,029; 6,943,602; and 7,101,791 (collectively “the NB Patents”).

*Conversant IP Management Patents*

18. On April 24, 2001, the United States Patent and Trademark Office (“USPTO”) duly and legally issued United States Patent No. 6,223,331 (“the ’331 Patent”) entitled “Semiconductor Circuit Design Method For Employing Spacing Constraints And Circuits Thereof.” The ’331 patent is generally directed to semiconductor circuit design methods, to semiconductor processing methods and to integrated circuitry. Conversant IP Management holds all legal title, interest, and rights in the ’331 Patent.

19. On November 30, 2006, the USPTO duly and legally issued United States Patent No. 7,915,933 (“the ’933 Patent”), entitled “Circuit For Clamping Current In A Charge Pump.” The ’933 Patent is generally directed to a circuit clamp current in a charge pump. Conversant IP Management holds all legal title, interest, and rights in the ’933 Patent.

20. On May 10, 2011, the USPTO duly and legally issued United States Patent No. 7,940,081 (“the ’081 Patent”), entitled “Low Leakage And Data Retention Circuitry.” The ’081 Patent is generally directed to an integrated circuit that includes first circuitry and sleep transistor circuitry. Conversant IP Management holds all legal title, interest, and rights in the ’081 Patent.

21. On May 17, 2011, the USPTO duly and legally issued United States Patent No. 7,945,885 (“the ’885 Patent”), entitled “Power Managers For An Integrated Circuit.” The ’885 Patent is generally directed to a system for an integrated circuit comprising a plurality of power islands includes a first power manager and second power manager. Conversant IP Management holds all legal title, interest, and rights in the ’885 Patent.

22. On July 19, 2011, the USPTO duly and legally issued United States Patent No. 7,982,532 (“the ’532 Patent”), entitled “Systems And Methods For Minimizing Static Leakage

Of An Integrated Circuit.” The ’532 Patent is generally directed to a system for minimizing static leakage of an integrated circuit that comprises a charge pump, an adaptive leakage controller, and a negative voltage regulator. Conversant IP Management holds all legal title, interest, and rights in the ’532 Patent.

23. On August 9, 2011, the USPTO duly and legally issued United States Patent No. 7,996,811 (“the ’811 Patent”), entitled “Power Managers For An Integrated Circuit.” The ’811 Patent is generally directed to a system for an integrated circuit comprising a plurality of power islands that includes a first power manager and second power manager. Conversant IP Management holds all legal title, interest, and rights in the ’881 Patent.

24. On August 28, 2012, the USPTO duly and legally issued United States Patent No. 8,253,438 (“the ’438 Patent”), entitled “Low Leakage and Data Retention Circuitry.” The ’438 Patent is generally directed to an integrated circuit that includes first circuitry and sleep transistor circuitry. Conversant IP Management holds all legal title, interest, and rights in the ’438 Patent.

*NB Patents*

25. On May 14, 2013, the USPTO duly and legally reissued United States Patent No. RE44,218 (“the ’218 Patent”), entitled “Semiconductor Memory Device For Controlling Write Recovery Time.” The ’218 Patent is generally directed to a semiconductor memory device, and more particularly, to a semiconductor memory device having ability of controlling timing of an auto-pre-charge operation depending on a column address strobe (CAS) latency mode. NB holds all legal title, interest, and rights in the ’218 Patent.

26. On August 18, 1998, the USPTO duly and legally issued United States Patent No. 5,796,675 (“the ’675 Patent”), entitled “Synchronous Memory Device Having Dual Input Registers Of Pipeline Structure In Data Path.” The ’675 Patent is generally directed to a memory device and more particularly to a synchronous memory device having a pipeline structure in a

data read path to transmit information at a high speed in very large scaled integrated circuits. NB holds all legal title, interest, and rights in the '675 Patent.

27. On August 22, 2000, the USPTO duly and legally issued United States Patent No. 6,107,138 ("the '138 Patent"), entitled "Method For Fabricating a Semiconductor Device Having a Tapered Contact Hole." The '138 Patent is generally directed to a semiconductor device having an improved storage capacitor contact for improved refresh characteristics and a method for fabricating the same. NB holds all legal title, interest, and rights in the '138 Patent.

28. On March 27, 2001, the USPTO duly and legally issued United States Patent No. 6,209,056 ("the '056 Patent"), entitled "Semiconductor Memory Device Having a Plurality Of Bank Sections Distributed In a Plurality Of Divided Memory Cell Arrays." The '056 Patent is generally directed to a method for distributing banks in a semiconductor memory device, in which individual cells are efficiently grouped into the banks, and more particularly to a bank distribution method for dividing each cell array vertically and horizontally into a plurality of banks and minimizing the length of data bus to make a high-speed operation of the semiconductor memory device possible. NB holds all legal title, interest, and rights in the '056 Patent.

29. On October 23, 2001, the USPTO duly and legally issued United States Patent No. 6,306,743 ("the '743 Patent"), entitled "Method For Forming A Gate Electrode On A Semiconductor Substrate." The '743 Patent is generally directed to a method for fabricating a semiconductor device, and more particularly, to a method for forming a gate electrode on a semiconductor substrate, which reduces line resistance and formation of ohmic contacts. NB holds all legal title, interest, and rights in the '743 Patent.

30. On November 6, 2001, the USPTO duly and legally issued United States Patent No. 6,313,029 (“the ’029 Patent”), entitled “Method For Forming Multi-Layer Interconnection Of A Semiconductor Device.” The ’029 Patent is generally directed to a method for forming a multi-layer interconnection of a semiconductor device, and more particularly to a method for forming micro-size contact holes for electrical connection between lower and upper interconnection layers fitted with fabrication of highly integrated semiconductor devices. NB holds all legal title, interest, and rights in the ’029 Patent.

31. On September 13, 2005, the USPTO duly and legally issued United States Patent No. 6,943,602 (“the ’602 Patent”), entitled “Delay Locked Loop and Locking Method Thereof.” The ’602 Patent is generally directed to a semiconductor memory device, and more particularly, to a delay locked loop of a semiconductor memory device and a locking method thereof. NB holds all legal title, interest, and rights in the ’602 Patent.

32. On September 5, 2006, the USPTO duly and legally issued United States Patent No. 7,101,791 B2 (“the ’791 Patent”), entitled “Method For Forming Conductive Line of Semiconductor Device.” The ’791 Patent is generally directed to a method for forming conductive line of semiconductor device, and in particular to an improved method for forming conductive line of semi-conductor device which provides improved contact resistance characteristics. NB holds all legal title, interest, and rights in the ’791 Patent.

### **GENERAL ALLEGATIONS**

33. Samsung has directly infringed and continues to directly infringe one or more of the Asserted Patents by making, using, offering to sell, selling, or importing devices, methods, or processes within the scope of one or more of the claims of the Asserted Patents.

34. Samsung has indirectly infringed and continues to indirectly infringe one or more of the Asserted Patents by contributing to and actively inducing infringement of one or more of

the claims of the Asserted Patents. Samsung has notice of the Asserted Patents. The accused products are known by Samsung to be especially made or especially adapted for use in an infringement of one or more of the Asserted Patents, and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Samsung contributes to the infringement of one or more of the Asserted Patents by selling or importing the accused products to third parties, such as end-users, resellers, partners, and distributors, who incorporate the accused products into their products and/or practice one or more claims of the Asserted Patents. Samsung has indirectly infringed and continues to indirectly infringe one or more of the Asserted Patents by actively inducing infringement of one or more of the claims of the Asserted Patents. Samsung actively induces infringement by encouraging the use of the accused products by third parties, such as end-users, resellers, partners, and distributors, in ways that infringe one or more of the claims of the Asserted Patents. Samsung knew or should have known that such encouragement would induce infringement. Such induced infringement has occurred at least since Samsung became aware of the Asserted Patents.

35. As a result, Samsung has been and is still infringing one or more of the claims of the Asserted Patents as defined by 35 U.S.C. § 271. Conversant has suffered damage by reason of such infringement and will continue to suffer additional damage until this Court enjoins the infringing conduct.

36. Samsung has continued its infringing activities after receiving notice of the Asserted Patents despite the objectively substantial and high likelihood that they are liable for infringement of valid patent rights, and, therefore, such infringement is willful, entitling Conversant to the recovery of increased damages under 35 U.S.C. § 284.

37. Infringement of one or more of the Asserted Patents by Samsung renders this an “exceptional case” justifying an award of attorneys’ fees and costs to Conversant under 35 U.S.C. § 285.

38. Conversant believe that Samsung will continue to infringe one or more of the Asserted Patents unless enjoined by this Court. Such infringing activity has caused Conversant irreparable harm and will continue to cause such harm without the issuance of an injunction.

**COUNT 1**  
**INFRINGEMENT OF U.S. PATENT NO. 6,223,331**

39. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

40. Samsung has been and is still infringing one or more of the claims of the ’331 Patent. Samsung’s infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the ’331 Patent, including, but not limited to, Samsung’s Apple A7 APL0698 SoC Application Processor integrated circuits and similar integrated circuits. Samsung’s actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 2**  
**INFRINGEMENT U.S. PATENT NO. 7,915,933**

41. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

42. Samsung has been and is still infringing one or more of the claims of the ’933 Patent. Samsung’s infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the ’933 Patent, including, but not limited to, Samsung’s Apple A7 APL0698 SoC Application Processor

integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 3**  
**INFRINGEMENT OF U.S. PATENT NO. 7,940,081**

43. Conversant incorporate by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

44. Samsung has been and is still infringing one or more of the claims of the '081 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '081 Patent, including, but not limited to, Samsung's Exynos 5410 Mobile Application Processor integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 4**  
**INFRINGEMENT OF U.S. PATENT NO. 7,945,885**

45. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

46. Samsung has been and is still infringing one or more of the claims of the '885 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '885 Patent, including, but not limited to, Samsung's Exynos 4 Quad (Exynos 4412) Microprocessor and Samsung's Apple A5 APL2498 SoC Application Processor integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 5**  
**INFRINGEMENT OF U.S. PATENT NO. 7,982,532**

47. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

48. Samsung has been and is still infringing one or more of the claims of the '532 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '532 Patent, including, but not limited to, Samsung's Exynos 5410 Mobile Application Processor integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 6**  
**INFRINGEMENT OF U.S. PATENT NO. 7,996,811**

49. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

50. Samsung has been and is still infringing one or more of the claims of the '811 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '811 Patent, including, but not limited to, Samsung's Exynos 4 Quad (Exynos 4412) Microprocessor and Samsung's Apple A5 APL2498 SoC Application Processor integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 7**  
**INFRINGEMENT OF U.S. PATENT NO. 8,253,438**

51. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

52. Samsung has been and is still infringing one or more of the claims of the '438 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '438 Patent, including, but not limited to, Samsung's Exynos 5410 Mobile Application Processor integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 8**  
**INFRINGEMENT OF U.S. PATENT NO. RE44,218**

53. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

54. Samsung has been and is still infringing one or more of the claims of the '218 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '218 Patent, including, but not limited to, Samsung's K4B2G0846D DDR3 SDRAM integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 9**  
**INFRINGEMENT OF U.S. PATENT NO. 5,796,675**

55. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

56. Samsung has been and is still infringing one or more of the claims of the '675 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '675 Patent, including, but not limited to, Samsung's K4B2G0846D DDR3 SDRAM and K9CFGY8U5A-CCK0 64 Gbits TLC NAND Flash memory integrated circuits and similar integrated circuits.

Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 10**  
**INFRINGEMENT OF U.S. PATENT NO. 6,107,138**

1. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

2. Samsung has been and is still infringing one or more of the claims of the '138 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '138 Patent, including, but not limited to, Samsung's Apple A5 APL2498 SoC Application Processor integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 11**  
**INFRINGEMENT OF U.S. PATENT NO. 6,209,056**

3. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

4. Samsung has been and is still infringing one or more of the claims of the '056 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '056 Patent, including, but not limited to, Samsung's K3QF2F200C-XGCE LPDDR3 SDRAM integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 12**  
**INFRINGEMENT OF U.S. PATENT NO. 6,306,743**

5. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

6. Samsung has been and is still infringing one or more of the claims of the '743 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '743 Patent, including, but not limited to, Samsung's K3PE7E700B-XXC1 4 Gbit LPDDR3 SDRAM integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 13**  
**INFRINGEMENT OF U.S. PATENT NO. 6,313,029**

7. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

8. Samsung has been and is still infringing one or more of the claims of the '029 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '029 Patent, including, but not limited to, Samsung's Apple A7 APL0698 SoC Application Processor integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (c), (f), and (g).

**COUNT 14**  
**INFRINGEMENT OF U.S. PATENT NO. 6,943,602**

9. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

10. Samsung has been and is still infringing one or more of the claims of the '602 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '602 Patent, including, but not limited to, Samsung's K4B2G0846D DDR3 SDRAM integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**COUNT 15**  
**INFRINGEMENT OF U.S. PATENT NO. 7,101,791**

11. Conversant incorporates by reference each of the foregoing paragraphs of this Complaint as though fully set forth herein.

12. Samsung has been and is still infringing one or more of the claims of the '791 Patent. Samsung's infringing acts include, but are not limited to, making, using, offering to sell, selling, or importing devices within the scope of one or more of the claims of the '791 Patent, including, but not limited to, Samsung's K4B4G0846C-BCK0 4 Gbit DDR3 SDRAM integrated circuits and similar integrated circuits. Samsung's actions are in violation of one or more provisions of 35 U.S.C. § 271(a), (b), (c), (f), and (g).

**JURY DEMAND**

13. Conversant demands a jury trial on all issues so triable, pursuant to Rule 38 of the Federal Rules of Civil Procedure.

**PRAYER FOR RELIEF**

WHEREFORE, Conversant prays for entry of judgment and an order that:

- a. Samsung has infringed and is infringing one or more claims of the Asserted Patents, either literally or under the doctrine of equivalents, and is liable to Conversant for infringement;

- b. Samsung accounts for and pays to Conversant all damages, assessment of pre-judgment and post-judgment interest, and costs of Conversant caused by Samsung's infringement;
- c. Conversant be granted permanent injunctive relief pursuant to 35 U.S.C. § 283, enjoining Samsung, its officers, agents, servants, employees, affiliates and those persons in active concert of participation with Samsung from further acts of infringement of the Asserted Patents;
- d. In the event the Court determines it will not enter a permanent injunction, Samsung continues to pay royalties to Conversant for its infringement of the Asserted Patents on a going-forward basis;
- e. Samsung's infringement of the Asserted Patents has been willful;
- f. Samsung account for and pay for increased damages for willful infringement under 35 U.S.C. § 284;
- g. Costs and attorneys' fees be awarded to Conversant, as this is an exceptional case under 35 U.S.C. § 285;
- h. An award of costs, expenses, and disbursements;
- i. Prejudgment and post-judgment interest at the maximum lawful rate; and
- j. Such other and further relief as the Court deems Conversant may be entitled to in law and equity.

Dated: February 26, 2015

Respectfully submitted,

By: /s/ Bryan J. Vogel w/permission Wesley Hill

Bryan J. Vogel (*pro hac vice* to be submitted)  
LEAD ATTORNEY

Miles A. Finn (*pro hac vice* to be submitted)

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Seth A. Northrop (*pro hac vice* to be submitted)

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