IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FG SRC LLC,
 	
     Plaintiff,
 	
v.
 	
XILINX, INC.,
 	
     Defendant.
	Case No. _____
	
	JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff FG SRC LLC ("SRC") files this Original Complaint for Patent Infringement ("Complaint") against Defendant Xilinx, Inc. ("Defendant" or "Xilinx"). Plaintiff alleges as follows:

I. NATURE OF THE ACTION

1. This is an action for infringement of U.S. Patent Nos. 7,149,867 (the "'867 patent") and 9,153,311 (the "'311 patent").

2. SRC is a limited liability company incorporated in Delaware and is the successor to SRC Computers, LLC ("SRC Computers").

3. Xilinx, Inc. is a Delaware corporation with its principal place of business located at 2100 Logic Drive, San Jose, California 95154.

II. JURISDICTION

4. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This is a patent infringement lawsuit, over which this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has general and specific personal jurisdiction over Defendant because it is present in and transacts and conducts business in and with residents of this District and the State of Delaware. Defendant is incorporated in the State of Delaware and has conducted and does conduct business therein. Defendant has purposefully and voluntarily availed itself of the privileges of conducting business in the United States and the State of Delaware by continuously and systematically placing goods into the stream of commerce through a distribution channel with the expectation that they will be purchased by consumers in Delaware. Plaintiff's causes of action arise directly from Defendant's business contacts and other activities in the State of Delaware.

6. Upon information and belief, Defendant has committed acts of infringement in this District giving rise to this action and does business in this District, including making sales and/or providing service and support for its customers in this District. Defendant purposefully and voluntarily sold one or more of its infringing products with the expectation that they would be purchased by consumers in this District. These infringing products have been and continue to be purchased by consumers in this District.

III. VENUE

7. Venue is proper as to Defendant under 28 U.S.C. § 1400(b) in that Defendant is incorporated in Delaware and, therefore, resides in this District. *TC Heartland LLC v. Kraft Foods Grp. Brands LLC*, 137 S. Ct. 1514, 1521 (2017).

IV. FG SRC LLC AND DEFENDANT'S PRODUCTS

A. FG SRC LLC

8. SRC Computers was co-founded by Seymour R. Cray, Jim Guzy, and Jon Huppenthal in 1996 to produce unique high-performance computer systems using Intel's Merced microprocessor.

9. SRC is the successor to SRC Computers.

10. Jim Guzy is a co-founder of Intel Corporation and served on Intel's board for 38 years.

11. Mr. Guzy was named to Forbes Midas List, which surveys the top tech deal makers in the world, in 2006 and 2007.

12. Seymour Cray was an American electrical engineer and supercomputer architect who designed a series of computers that were the fastest in the world for decades.

13. Mr. Cray has been credited with creating the supercomputing industry.

14. Unfortunately, Mr. Cray died shortly after founding SRC Computers.

15. But his legacy was carried on by Jon Huppenthal and a talented team of engineers that worked with Mr. Cray and Mr. Huppenthal for decades.

16. SRC Computers' focus was creating easy-to-program, general-purpose reconfigurable computing systems.

17. In early 1997, Mr. Huppenthal and his team realized that the microprocessors of the day had many shortcomings relative to the custom processing engines that they were used to.

18. As a result, they decided to incorporate dedicated processing elements built from Field Programmable Gate Arrays ("FPGAs") and that idea quickly evolved into a novel system combining reconfigurable processors and CPUs.

19. SRC Computers' heterogenous system had 100x performance, 1/50th of the operating expense, 1/100th of the power usage, and required 1/500th of the space of more traditional computer systems.

20. SRC Computers' proven systems are used for some of the most demanding military and intelligence applications, including the simultaneous real-time processing and analysis of

radar, flight and mission data collected from a variety of aerial vehicles in over 1,000 successful counter-terrorism and counter-insurgency missions for the U.S. Department of Defense.

21. SRC Computers offered its first commercial product in 2015 called the Saturn 1 server.

22. The Saturn 1 was 100 times faster than a server with standard Intel microprocessors while using one percent of the power.

23. The Saturn 1 was designed to be used in HP's Moonshot server chassis for data centers.

24. SRC Computers has had over 30 U.S. patents issued for its innovative technology.

25. SRC Computers' patent portfolio covers numerous aspects of reconfigurable computing and has more than 2,090 forward citations.

26. In February 2016, SRC Computers restructured into three new entities: a corporate parent FG SRC LLC, an operating company DirectStream, LLC ("DirectStream"), and a licensing entity SRC Labs, LLC.

B. Accused Products

27. In this complaint, Plaintiff accuses the following Xilinx products (collectively "Accused Products") of infringing the '867 and ''311 patents. For clarity, accused product families are listed, as are exemplary device names and/or part numbers or part number prefixes.

Product Family	Exemplary Device Names	Exemplary Part Numbers and/or Part Number Prefixes
Alveo accelerator cards	U25, U200, U250, U280	
Kintex UltraScale+ FPGA devices	KU3P, KU5P, KU9P, KU11P, KU13P, KU15P	
Virtex UltraScale+ FPGA devices	VU3P, VU5P, VU7P, VU9P, VU11P, VU13P, VU19P, VU27P, VU29P, VU31P, VU33P, VU35P, VU37P, VU45P, VU47P	
Zynq UltraScale+ MPSoC: CG devices	ZU2CG, ZU3CG, ZU4CG, ZU5CG, ZU6CG, ZU7CG, ZU9CG	

Product Family	Exemplary Device Names	Exemplary Part Numbers and/or Part Number Prefixes
Zynq UltraScale+ MPSoC: EG devices	ZU2EG, ZU3EG, ZU4EG, ZU5EG, ZU6EG, ZU7EG, ZU9CG, ZU11EG, ZU15EG, ZU17EG, ZU19EG	
Zynq UltraScale+ MPSoC: EV devices	ZU4EV, ZU5EV, ZU7EV	
Zynq Ultrascale+ RFSoC devices	ZU21DR, ZU25DR, ZU27DR, ZU28DR, ZU29DR, ZU39DR, ZU43DR, ZU46DR, ZU47DR, ZU48DR, ZU49DR	
Kintex UltraScale FPGA devices	KU025, KU035, KU040, KU060, KU085, KU095, KU115	
Virtex UltraScale FPGA devices	XCVU065, XCVU080, XCVU095, VCVU125, XCVU160, XCVU190, XCVU440	
Spartan 7-Series FPGA devices		XC7S6, XC7S15, XC7S25, XC7S50, XC7S75, XC7S100
Artix 7-Series FPGA devices		XC7A12T, XC7A15T, XC7A25T, XC7A35T, XC7A50T, XC7A75T, XC7A100T, XC7A200T
Kintex 7-Series FPGA devices		XC7K70T, XC7K160T, XC7K325T, XCE7K325T, XC7K355T, XCE7K355T, XC7K410T, XCE7K410T, XC7K420T, XCE7K420T, XC7K480T, XCE7K480T
Virtex 7-Series FPGA devices		XC7V585T, XCE7V585T, XC7V2000T, XC7VX330T, XCE7VX330T, XC7VX415T, XCE7VX415T, XC7VX485T, XCE7VX485T, XC7VX550T, XCE7VX550T, XC7VX690T, XCE7VX690T, XC7VX980T, XCE7VX980T, XCVX1140T, XC7VH580T, XC7VH870T

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