

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

FG SRC LLC,

Plaintiff,

v.

XILINX, INC.,

Defendant.

Case No. 1:20-cv-00601-LPS

JURY TRIAL DEMANDED

**PLAINTIFF'S SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff FG SRC LLC ("SRC") files this Second Amended Complaint for Patent Infringement ("Second Amended 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 No. 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 services 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 Central Processing Units ("CPUs").

19. SRC Computers' heterogenous system had 100x performance, 1/50<sup>th</sup> of the operating expense, 1/100<sup>th</sup> of the power usage, and required 1/500<sup>th</sup> 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 ("SRC Labs").

#### **B. Accused Products**

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

<b>Product Family</b>	<b>Exemplary Device Names</b>	<b>Exemplary Part Numbers and/or Part Number Prefixes</b>
Alveo accelerator cards	U25, U200, U250, U280, SN1022 (aka SN1000)	
Kintex UltraScale+ Evaluation Kit	KCU116	
Virtex UltraScale+ Evaluation Kit	VCU118	
Zynq UltraScale+ Evaluation Kits and Characterization Kits	ZCU102, ZCU104, ZCU106, ZCU111, ZCU208, ZCU216, ZCU1275, ZCU1285	
Kintex UltraScale Evaluation Kit	KCU105	
Virtex UltraScale Evaluation Kit	VCU108	
Virtex-7 Evaluation Kits and Connectivity Kits	VC707, VC709	

<b>Product Family</b>	<b>Exemplary Device Names</b>	<b>Exemplary Part Numbers and/or Part Number Prefixes</b>
Zynq-7000 Evaluation Kits	ZC702, ZC706	
Kintex UltraScale+ FPGA devices	KU3P, KU5P, KU9P, KU11P, KU13P, KU15P, KU19P	
Virtex UltraScale+ FPGA devices	VU3P, VU5P, VU7P, VU9P, VU11P, VU13P, VU19P, VU23P, VU27P, VU29P, VU31P, VU33P, VU35P, VU37P, VU45P, VU47P, VU57P	
Zynq UltraScale+ MPSoC: CG devices	ZU2CG, ZU3CG, ZU4CG, ZU5CG, ZU6CG, ZU7CG, ZU9CG	
Zynq UltraScale+ MPSoC: EG devices	ZU2EG, ZU3EG, ZU4EG, ZU5EG, ZU6EG, ZU7EG, ZU9EG, ZU11EG, ZU15EG, ZU17EG, ZU19EG	
Zynq UltraScale+ MPSoC: EV devices	ZU4EV, ZU5EV, ZU7EV	
Zynq Ultrascale+ RFSoc devices	ZU21DR, ZU25DR, ZU27DR, ZU28DR, ZU29DR, ZU39DR, ZU42DR, 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,

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.