

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GODO KAISHA IP BRIDGE 1,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 2:17-cv-00676

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Godo Kaisha IP Bridge 1 (“IP Bridge” or “Plaintiff”) brings this Complaint for Patent Infringement (“Complaint”) against Intel Corporation (“Intel” or “Defendant”). Plaintiff alleges as follows:

**NATURE OF THE ACTION**

1. This is an action brought by IP Bridge against Intel for infringement of U.S. Patent Nos. 6,197,696 (“the ’696 Patent”), RE41,980 (“the RE’980 Patent”), 7,279,727 (“the ’727 Patent”), 6,709,950 (“the ’950 Patent”), 6,967,409 (“the ’409 Patent”), 6,346,736 (“the ’736 Patent”), 7,800,165 (“the ’165 Patent”), 6,387,824 (“the ’824 Patent”), and 6,602,802 (“the ’802 Patent”) (collectively, “the Asserted Patents”).

2. Two of the Asserted Patents, the ’696 Patent and the RE’980 Patent previously were asserted by IP Bridge in the Marshall Division of the Eastern District of Texas in *Godo Kaisha IP Bridge 1 v. Broadcom Ltd., et al.*, case no. 2:16-cv-00134 (E.D. Tex.) (the “Broadcom Action”).

### **THE PARTIES**

3. Plaintiff IP Bridge is a Japanese entity with its principal place of business located at c/o Sakura Sogo Jimusho, 1-11 Kanda Jimbocho, Chiyoda-ku, Tokyo, 101-0051, Japan. IP Bridge owns the Asserted Patents.

4. Upon information and belief, Defendant Intel is a Delaware corporation with its principal place of business at 2200 Mission College Boulevard, Santa Clara, California 95054.

### **JURISDICTION AND VENUE**

5. This is an action arising under the patent laws of the United States. Accordingly, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 (federal question) and 1338(a) (action arising under an Act of Congress relating to patents).

6. This Court has general and specific personal jurisdiction over Intel at least in part because Intel is present and/or transacts and conducts business in, and with residents of, the State of Texas and this judicial District. IP Bridge's causes of action arise, at least in part, from Intel's contacts with and activities in the State of Texas and this judicial District. Upon information and belief, Intel has committed acts of infringement within the State of Texas and this judicial District by, *inter alia*, directly and/or indirectly making, selling, offering for sale, importing, and/or using products that infringe one or more claims of the Asserted Patents. Intel, directly and/or through intermediaries, uses, sells, ships, distributes, offers for sale, and/or advertises or otherwise promotes its products in the State of Texas and this judicial District. Also, Intel has a number of subsidiaries that upon information and belief are involved in making, selling, offering for sale, and/or importing into the U.S., Intel's semiconductor products and that on information and belief Intel directs and controls, including Intel Americas, Inc.

7. Venue is proper pursuant to 28 U.S.C. § 1400(b) because Intel "has committed acts of infringement and has a regular and established place of business" in this judicial District.

Indeed, Intel regularly conducts and solicits business in, engages in other persistent courses of conduct in, and/or derives substantial revenue from goods and services provided to, residents of the State of Texas and this judicial District. For example, Intel makes numerous external representations of its presence in the State of Texas and, more particularly, this District, by listing a Plano address (5000 Headquarters Dr.) on its U.S. offices webpage and posting online job listings for positions in Plano. Additionally, Intel advertises its significant operations in Texas on a dedicated section of its website entitled “Intel in Texas,” wherein Intel states, “Intel has more than 2,300 employees in Austin and Plano.” *See Intel in Texas, Intel, <https://www.intel.com/content/www/us/en/corporate-responsibility/intel-in-texas.html>* (last visited Sept. 21, 2017). Further, upon information and belief, Intel has an office in Richardson, Texas located at 3400 Waterview Parkway, within this judicial District, where Intel offers direct sales support consisting of Field Sales Engineers, Field Application Engineers and Inside Sales Teams for Intel’s field-programmable gate array products. Upon information and belief, Intel also benefits from its presence in this judicial District both directly and via the presence of third party distributors in Plano and elsewhere in this judicial District. Intel also has availed itself of the benefits and protections of the State’s laws by filing suit in this judicial District.

8. Furthermore, upon information and belief, Intel has purposefully and voluntarily placed one or more infringing products into the stream of commerce with the expectation that they will be purchased and/or used by residents of this judicial District and/or incorporated into downstream products purchased by consumers in this judicial District, including by directly and indirectly working with distributors, and other entities located in the State of Texas, to ensure its products reach the State of Texas and this judicial District.

9. Upon information and belief, Intel has official distributors located in Plano, Texas; Richardson, Texas; Irving, Texas; Austin, Texas; and Coppell, Texas. More particularly, Arrow Electronics (Electronic Components division) and SYNEX Corporation, which are Intel Authorized Distributors, have offices in Plano, Texas and Richardson, Texas, respectively.

10. In addition, Intel maintains highly interactive and commercial websites, accessible to residents of the State of Texas and this judicial District, through which Intel promotes and facilitates sales of its products and services, including products that infringe the Asserted Patents.

11. Upon information and belief, Intel sells its products directly to customers via its website at <https://www.intel.com/buy/us/en/>. Intel's website includes a link titled "How to Buy," which directs consumers in the United States, including those in the State of Texas and this judicial District, to purchase Intel products either directly from the website or through Intel Technology Providers, Intel Authorized Distributors, and/or Intel Approved Suppliers. Intel's website also includes a submission form that allows customers to input information in order to obtain technical or sales support from Intel.

12. Further, Intel is registered to do business in Texas as Intel Corporation and Intel Semiconductor (US) LLC.

### **INTEL'S INFRINGING PRODUCTS AND ACTIVITIES**

13. IP Bridge realleges and incorporates by reference the allegations of paragraphs 1-12 of this Complaint.

14. Intel is a global manufacturer and supplier of semiconductor components and products for use in consumer and enterprise products, systems, and services. Intel designs, makes, uses, sells, offers for sale, imports into the United States, and provides support for semiconductor chips, such as products with the part name or number i5-3550, E89459, QX9650, M 5Y70, and GT3e G82494, and other semiconductor products that have similar structures, features, or

functionalities, and/or are made by similar manufacturing processes, as the aforementioned products, including but not limited to Intel's 14nm, 22nm, 32nm, and 45nm process node semiconductor chips and products (collectively, "Accused Semiconductor Products").

15. The Accused Semiconductor Products are integrated into devices made, used, sold, offered for sale, and/or imported into the United States, by, among others, Intel, original equipment manufacturers, original design manufacturers, distributors, and other third parties. Intel's Accused Semiconductor Products are essential, non-trivial components of the products into which they are integrated. For example, the Core i5-3550 processor powers desktops such as the Dell OptiPlex 7010.

16. Upon information and belief, on Feb. 17, 2017, Intel filed with the United States Securities and Exchange Commission a Form 10-K. Relevant portions of the Form 10-K are attached hereto as Exhibit A.

17. Intel's Form 10-K states, "Our products are sold through sales offices throughout the world." Upon information and belief, said sales offices are located throughout the United States, including within the State of Texas and this judicial District.

18. Additionally, Intel's Form 10-K states, "We sell our products primarily to OEMs and ODMs[,] but also sell to "other manufacturers and service providers... who buy our products through distributor, reseller, retail, and OEM channels throughout the world." Upon information and belief, Intel sells its products to customers in the United States, including within the State of Texas and this judicial District.

19. Upon information and belief, Intel maintains a website that advertises the Accused Semiconductor Products, including identifying the applications for which the accused devices can be used and pricing for the Accused Semiconductor Products, as well as directions on how to

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