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BY: _____

CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

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FILED

Attorney for Plaintiff,

DRAM MEMORY TECHNOLOGIES LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA.

DRAM MEMORY TECHNOLOGIES
LLC,

Plaintiff,

vs.

ELITE SEMICONDUCTOR MEMORY
TECHNOLOGY INC.;;
ETRON TECHNOLOGY AMERICA,
INC.;;
ETRON TECHNOLOGY, INC.;; AND
INTEGRATED SILICON SOLUTION,
INC.

Defendants.

Case No. **SA 11-00332** Doc (SS)

**ORIGINAL COMPLAINT FOR
PATENT INFRINGEMENT**

JURY TRIAL DEMANDED

Filing Date: TBD
Trial Date: TBD
Discovery Cut-off: TBD
Motion Cut-off: TBD

This is an action for patent infringement in which DRAM Memory Technologies LLC submits this Complaint against Elite Semiconductor Memory Technology Inc.; Etron Technology America, Inc.; Etron Technology, Inc.; and Integrated Silicon Solution, Inc. (collectively "Defendants").

PARTIES

1
2 1. DRAM Memory Technologies LLC (“DRAM MEMTECH” or
3
4 “Plaintiff”) is a California limited liability company with a place of business at 500
5 Newport Center Drive, Suite 700, Newport Beach, CA 92660.

6
7 2. On information and belief, Elite Semiconductor Memory Technology
8 Inc. (“ESMT”) is an entity organized under the laws of Taiwan with a place of
9 business at No. 23, Industry E. Road IV Science-Based Industrial Park, Hsinchu 300,
10 Taiwan.

11
12 3. On information and belief, Etron Technology America, Inc. (“Etron
13 America”) is a California corporation with a place of business at 3375 Scott Blvd.
14 Suite 128, Santa Clara, California 95054.

15
16 4. On information and belief, Etron Technology, Inc. (“Etron Taiwan”) is
17 an entity organized under the laws of Taiwan with a place of business at No. 6
18 Technology Rd. 5, Science-Based Industrial Park, Hsinchu, 30078, Taiwan. Etron
19 America and Etron Taiwan are referred to collectively as “Etron.”
20

21
22 5. On information and belief, Integrated Silicon Solution, Inc. (“ISSI”) is a
23 Delaware corporation with a place of business at 1940 Zanker Road, San Jose, CA
24 95112-4216.
25
26
27
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JURISDICTION AND VENUE

1
2 6. This action arises under the patent laws of the United States, Title 35 of
3
4 the United States Code. This Court has subject matter jurisdiction pursuant to 28
5 U.S.C. §§ 1331 and 1338(a). On information and belief, Defendants are subject to
6
7 this Court’s specific and general personal jurisdiction, pursuant to due process and/or
8 the California Long Arm Statute, due at least to their substantial business in this
9
10 forum, including at least a portion of the infringements alleged herein. On
11 information and belief, within this district Defendants, directly and/or through
12 intermediaries, have advertised (including through websites), offered to sell, sold
13 and/or distributed infringing products, and/or have induced the sale and use of
14
15 infringing products. Further, on information and belief, Defendants are subject to the
16 Court’s general jurisdiction, including from regularly doing or soliciting business,
17
18 engaging in other persistent courses of conduct, and/or deriving substantial revenue
19 from goods and services provided to individuals in California.

20 7. Venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and
21
22 1400(b). On information and belief, from and within this Judicial District each
23
24 Defendant has committed at least a portion of the infringements at issue in this case.
25
26 Without limitation, on information and belief, within this district Defendants, directly
27 and/or through intermediaries, have advertised (including through websites), offered
28

1 to sell, sold and/or distributed infringing products, and/or have induced the sale and
2 use of infringing products.

3
4 **COUNT I**

5 **INFRINGEMENT OF U.S. PATENT NO. 6,765,838**

6
7 8. United States Patent No. 6,765,838 (“the ‘838 patent”), entitled “Refresh
8 Control Circuitry for Refreshing Storage Data,” issued on July 20, 2004.

9
10 9. DRAM MEMTECH is the present assignee of the entire right, title and
11 interest in and to the ‘838 patent, including all rights to sue for past and present
12 infringement. Accordingly, DRAM MEMTECH has standing to bring this lawsuit for
13 infringement of the ‘838 patent.

14
15 10. The various claims of the ‘838 patent cover, inter alia, semiconductor
16 memory devices, namely dynamic random access memory (hereinafter “DRAM”)
17 chips, comprising refresh address generating circuitry for generating a multi-bit
18 refresh address designating a memory cell to be refreshed, and refresh activating
19 circuitry for generating a refresh array activating signal for activating a refresh
20 operation in accordance with a specific address bit of the refresh address and a refresh
21 request.
22

23
24 11. On information and belief, ESMT has been and now is infringing the
25 ‘838 patent by actions comprising making, using, selling, offering for sale and/or
26 importing synchronous semiconductor memory devices, namely DRAM chips,
27
28

1 comprising refresh address generating circuitry for generating a multi-bit refresh
2 address designating a memory cell to be refreshed, and refresh activating circuitry for
3 generating a refresh array activating signal for activating a refresh operation in
4 accordance with a specific address bit of the refresh address and a refresh request,
5 including, but not limited to, ESMT's M53D128168A Mobile DDR SDRAM,
6
7

8 12. On information and belief, at least since receiving notice of the '838
9 patent, including at a minimum from this lawsuit, ESMT is and/or has been inducing
10 others, including without limitation manufacturers of apparatuses incorporating said
11 DRAM chips and/or resellers of said DRAM chips, to infringe the '838 patent,
12 including without limitation by selling, offering for sale and/or importing said DRAM
13 chips; and further ESMT is and/or has been inducing users to use said chips.
14
15

16 13. On information and belief, at least since receiving notice of the '838
17 patent, including at a minimum from this lawsuit, ESMT is and/or has been
18 contributing to the infringement of others, including without limitation said
19 manufacturers, resellers and/or users, including by selling, offering to sell and/or
20 importing said DRAM chips, at a minimum knowing the same to be especially made
21 or especially adapted for use in an infringement of the '838 patent, and not a staple
22 article or commodity of commerce suitable for substantial noninfringing use.
23
24
25

26 14. Accordingly, on information and belief ESMT is liable for infringement
27 of the '838 patent.
28

1 15. On information and belief, Etron has been and now is infringing the ‘838
2 patent by actions comprising making, using, selling, offering for sale and/or importing
3 synchronous semiconductor memory devices, namely DRAM chips, comprising
4 refresh address generating circuitry for generating a multi-bit refresh address
5 designating a memory cell to be refreshed, and refresh activating circuitry for
6 generating a refresh array activating signal for activating a refresh operation in
7 accordance with a specific address bit of the refresh address and a refresh request,
8 including but not limited to Etron’s EM68916CWQA DDRII SDRAM.
9
10
11

12 16. On information and belief, at least since receiving notice of the ‘838
13 patent, including at a minimum from this lawsuit, Etron is and/or has been inducing
14 others, including without limitation manufacturers of apparatuses incorporating said
15 DRAM chips and/or resellers of said DRAM chips, to infringe the ‘838 patent,
16 including without limitation by selling, offering for sale and/or importing said DRAM
17 chips; and further Etron is and/or has been inducing users to use said chips.
18
19

20 17. On information and belief, at least since receiving notice of the ‘838
21 patent, including at a minimum from this lawsuit, Etron is and/or has been
22 contributing to the infringement of others, including without limitation said
23 manufacturers, resellers and/or users, including by selling, offering to sell and/or
24 importing said DRAM chips, at a minimum knowing the same to be especially made
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1 or especially adapted for use in an infringement of the '838 patent, and not a staple
2 article or commodity of commerce suitable for substantial noninfringing use.

3
4 18. Accordingly, on information and belief Etron is liable for infringement of
5 the '838 patent.

6
7 19. On information and belief, ISSI has been and now is infringing the '838
8 patent by actions comprising making, using, selling, offering for sale and/or importing
9 synchronous semiconductor memory devices, namely DRAM chips, comprising
10 refresh address generating circuitry for generating a multi-bit refresh address
11 designating a memory cell to be refreshed, and refresh activating circuitry for
12 generating a refresh array activating signal for activating a refresh operation in
13 accordance with a specific address bit of the refresh address and a refresh request,
14 including but not limited to, ISSI's IS43DR83200A, IS43/46DR16160A, and
15 IS43DR32160A DDR2 SDRAMs.
16
17
18

19 20. On information and belief, at least since receiving notice of the '838
20 patent, including at a minimum from this lawsuit, ISSI is and/or has been inducing
21 others, including without limitation manufacturers of apparatuses incorporating said
22 DRAM chips and/or resellers of said DRAM chips, to infringe the '838 patent,
23 including without limitation by selling, offering for sale and/or importing said DRAM
24 chips; and further ISSI is and/or has been inducing users to use said chips.
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1 21. On information and belief, at least since receiving notice of the ‘838
2 patent, including at a minimum from this lawsuit, ISSI is and/or has been contributing
3
4 to the infringement of others, including without limitation said manufacturers,
5 resellers and/or users, including by selling, offering to sell and/or importing said
6
7 DRAM chips, at a minimum knowing the same to be especially made or especially
8
9 adapted for use in an infringement of the ‘838 patent, and not a staple article or
10
11 commodity of commerce suitable for substantial noninfringing use.

12 22. Accordingly, on information and belief ISSI is liable for infringement of
13
14 the ‘838 patent.

15 **COUNT II**

16 **INFRINGEMENT OF U.S. PATENT NO. 5,703,831**

17 23. United States Patent No. 5,703,831 (“the ‘831 patent”), entitled
18
19 “Synchronous Semiconductor Memory Device Having Internal Circuitry Enabled
20
21 Only When Commands Are Applied In Normal Sequence,” issued on December 30,
22
23 1997.

24 24. DRAM MEMTECH is the present assignee of the entire right, title and
25
26 interest in and to the ‘831 patent, including all rights to sue for past and present
27
28 infringement. Accordingly, DRAM MEMTECH has standing to bring this lawsuit for
infringement of the ‘831 patent.

1 25. The various claims of the ‘831 patent cover, inter alia, DRAM chips
2 operating in synchronization with an externally applied clock signal, comprising a
3 first command decoder generating an activating signal activating a predetermined first
4 internal operation, and a second command decoder enabled in response to the
5 activating signal from said first command decoder to activate a second internal
6 operation.
7
8

9 26. On information and belief, ESMT has been and now is infringing the
10 ‘831 patent by actions comprising making, using, selling, offering for sale and/or
11 importing synchronous semiconductor memory devices, namely DRAM chips
12 operating in synchronization with an externally applied clock signal, comprising a
13 first command decoder generating an activating signal activating a predetermined first
14 internal operation, and a second command decoder enabled in response to the
15 activating signal from said first command decoder to activate a second internal
16 operation, including but not limited to ESMT’s M14D5121632A DDR II SDRAM
17 and M13S256328A DDR SDRAM.
18
19
20
21

22 27. On information and belief, at least since receiving notice of the ‘831
23 patent, including at a minimum from this lawsuit, ESMT is and/or has been inducing
24 others, including without limitation manufacturers of apparatuses incorporating said
25 DRAM chips and/or resellers of said DRAM chips, to infringe the ‘831 patent,
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27
28

1 including without limitation by selling, offering for sale and/or importing said DRAM
2 chips; and further ESMT is and/or has been inducing users to use said chips.

3
4 28. On information and belief, at least since receiving notice of the '831
5 patent, including at a minimum from this lawsuit, ESMT is and/or has been
6 contributing to the infringement of others, including without limitation said
7 manufacturers, resellers and/or users, including by selling, offering to sell and/or
8 importing said DRAM chips, at a minimum knowing the same to be especially made
9 or especially adapted for use in an infringement of the '831 patent, and not a staple
10 article or commodity of commerce suitable for substantial noninfringing use.

11
12
13 29. Accordingly, on information and belief ESMT is liable for infringement
14 of the '831 patent.

15
16 30. On information and belief, Etron has been and now is infringing the '831
17 patent by actions comprising making, using, selling, offering for sale and/or importing
18 synchronous semiconductor memory devices, namely DRAM chips operating in
19 synchronization with an externally applied clock signal, comprising a first command
20 decoder generating an activating signal activating a predetermined first internal
21 operation, and a second command decoder enabled in response to the activating signal
22 from said first command decoder to activate a second internal operation, including but
23 not limited to, Etron's EM68916CWQA DDR II SDRAM and EM6AB160TSA DDR
24 SDRAM.
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1 31. On information and belief, at least since receiving notice of the ‘831
2 patent, including at a minimum from this lawsuit, Etron is and/or has been inducing
3 others, including without limitation manufacturers of apparatuses incorporating said
4 DRAM chips and/or resellers of said DRAM chips, to infringe the ‘831 patent,
5 including without limitation by selling, offering for sale and/or importing said DRAM
6 chips; and further Etron is and/or has been inducing users to use said chips.
7

9 32. On information and belief, at least since receiving notice of the ‘831
10 patent, including at a minimum from this lawsuit, Etron is and/or has been
11 contributing to the infringement of others, including without limitation said
12 manufacturers, resellers and/or users, including by selling, offering to sell and/or
13 importing said DRAM chips, at a minimum knowing the same to be especially made
14 or especially adapted for use in an infringement of the ‘831 patent, and not a staple
15 article or commodity of commerce suitable for substantial noninfringing use.
16
17

19 33. Accordingly, on information and belief Etron is liable for infringement of
20 the ‘831 patent.
21

22 34. On information and belief, ISSI has been and now is infringing the ‘831
23 patent by actions comprising making, using, selling, offering for sale and/or importing
24 synchronous semiconductor memory devices, namely ISSI chips operating in
25 synchronization with an externally applied clock signal, comprising a first command
26 decoder generating an activating signal activating a predetermined first internal
27
28

1 operation, and a second command decoder enabled in response to the activating signal
2 from said first command decoder to activate a second internal operation, including
3 without limitation, ISSI's IS43DR86400B DDR2 SDRAM and IS43/46LR16800E
4 Mobile DDR SDRAM.
5

6
7 35. On information and belief, at least since receiving notice of the '831
8 patent, including at a minimum from this lawsuit, ISSI is and/or has been inducing
9 others, including without limitation manufacturers of apparatuses incorporating said
10 DRAM chips and/or resellers of said DRAM chips, to infringe the '831 patent,
11 including without limitation by selling, offering for sale and/or importing said DRAM
12 chips; and further ISSI is and/or has been inducing users to use said chips.
13
14

15 36. On information and belief, at least since receiving notice of the '831
16 patent, including at a minimum from this lawsuit, ISSI is and/or has been contributing
17 to the infringement of others, including without limitation said manufacturers,
18 resellers and/or users, including by selling, offering to sell and/or importing said
19 DRAM chips, at a minimum knowing the same to be especially made or especially
20 adapted for use in an infringement of the '831 patent, and not a staple article or
21 commodity of commerce suitable for substantial noninfringing use.
22
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24
25 37. Accordingly, on information and belief ISSI is liable for infringement of
26 the '831 patent.
27

28
COUNT III

INFRINGEMENT OF U.S. PATENT NO. 6,396,747

1
2 38. United States Patent No. 6,396,747 (“the ‘747 patent”), entitled
3
4 “Semiconductor Memory Device Capable of High Speed Input/Output of Wide
5 Bandwidth Data By Improving Usage Efficiency of External Data Bus,” issued on
6 May 28, 2002.
7

8 39. DRAM MEMTECH is the present assignee of the entire right, title and
9 interest in and to the ‘747 patent, including all rights to sue for past and present
10 infringement. Accordingly, DRAM MEMTECH has standing to bring this lawsuit for
11 infringement of the ‘747 patent.
12

13 40. The various claims of the ‘747 patent cover, inter alia, DRAM chips
14 capable of inputting/outputting data signals transmitted as a data train in time series
15 by an external data bus in each of one read access operation and one write access
16 operation.
17
18

19 41. On information and belief, ESMT has been and now is infringing the
20 ‘747 patent by actions comprising making, using, selling, offering for sale and/or
21 importing synchronous semiconductor memory devices, namely DRAM chips capable
22 of inputting/outputting data signals transmitted as a data train in time series by an
23 external data bus in each of one read access operation and one write access operation,
24 including without limitation, ESMT’s M14D5121632A DDR II SDRAM and
25 M13S256328A DDR SDRAM.
26
27
28

1 42. On information and belief, at least since receiving notice of the ‘747
2 patent, including at a minimum from this lawsuit, ESMT is and/or has been inducing
3 others, including without limitation manufacturers of apparatuses incorporating said
4 DRAM chips and/or resellers of said DRAM chips, to infringe the ‘747 patent,
5 including without limitation by selling, offering for sale and/or importing said DRAM
6 chips; and further ESMT is and/or has been inducing users to use said chips.
7

9 43. On information and belief, at least since receiving notice of the ‘747
10 patent, including at a minimum from this lawsuit, ESMT is and/or has been
11 contributing to the infringement of others, including without limitation said
12 manufacturers, resellers and/or users, including by selling, offering to sell and/or
13 importing said DRAM chips, at a minimum knowing the same to be especially made
14 or especially adapted for use in an infringement of the ‘747 patent, and not a staple
15 article or commodity of commerce suitable for substantial noninfringing use.
16
17

19 44. Accordingly, on information and belief ESMT is liable for infringement
20 of the ‘747 patent.
21

22 45. On information and belief, Etron has been and now is infringing the ‘747
23 patent by actions comprising making, using, selling, offering for sale and/or importing
24 synchronous semiconductor memory devices, namely DRAM chips capable of
25 inputting/outputting data signals transmitted as a data train in time series by an
26 external data bus in each of one read access operation and one write access operation,
27
28

1 including, without limitation, Etron's EM68916CWQA DDR II SDRAM and
2 EM6AB160TSA DDR SDRAM.

3
4 46. On information and belief, at least since receiving notice of the '747
5 patent, including at a minimum from this lawsuit, Etron is and/or has been inducing
6 others, including without limitation manufacturers of apparatuses incorporating said
7 DRAM chips and/or resellers of said DRAM chips, to infringe the '747 patent,
8 including without limitation by selling, offering for sale and/or importing said DRAM
9 chips; and further Etron is and/or has been inducing users to use said chips.
10
11

12 47. On information and belief, at least since receiving notice of the '747
13 patent, including at a minimum from this lawsuit, Etron is and/or has been
14 contributing to the infringement of others, including without limitation said
15 manufacturers, resellers and/or users, including by selling, offering to sell and/or
16 importing said DRAM chips, at a minimum knowing the same to be especially made
17 or especially adapted for use in an infringement of the '747 patent, and not a staple
18 article or commodity of commerce suitable for substantial noninfringing use.
19
20
21

22 48. Accordingly, on information and belief Etron is liable for infringement of
23 the '747 patent.

24 49. On information and belief, ISSI has been and now is infringing the '747
25 patent by actions comprising making, using, selling, offering for sale and/or importing
26 synchronous semiconductor memory devices, namely DRAM chips capable of
27
28

1 inputting/outputting data signals transmitted as a data train in time series by an
2 external data bus in each of one read access operation and one write access operation,
3 including without limitation, ISSI's IS43DR86400B DDR2 SDRAM and
4 IS43/46LR16800E Mobile DDR SDRAM.
5

6 50. On information and belief, at least since receiving notice of the '747
7 patent, including at a minimum from this lawsuit, ISSI is and/or has been inducing
8 others, including without limitation manufacturers of apparatuses incorporating said
9 DRAM chips and/or resellers of said DRAM chips, to infringe the '747 patent,
10 including without limitation by selling, offering for sale and/or importing said DRAM
11 chips; and further ISSI is and/or has been inducing users to use said chips.
12
13
14

15 51. On information and belief, at least since receiving notice of the '747
16 patent, including at a minimum from this lawsuit, ISSI is and/or has been contributing
17 to the infringement of others, including without limitation said manufacturers,
18 resellers and/or users, including by selling, offering to sell and/or importing said
19 DRAM chips, at a minimum knowing the same to be especially made or especially
20 adapted for use in an infringement of the '747 patent, and not a staple article or
21 commodity of commerce suitable for substantial noninfringing use.
22
23
24

25 52. Accordingly, on information and belief ISSI is liable for infringement of
26 the '747 patent.
27
28

COUNT IV

INFRINGEMENT OF U.S. PATENT NO.6,351,423

1
2 53. United States Patent No. 6,351,423 (“the ‘423 patent”), entitled
3
4 “Semiconductor Memory Device Including Sense Amplifier Circuit Differing in
5 Drivability Between Data Write Mode and Data Read Mode,” issued on February 26,
6 2002.

7
8 54. DRAM MEMTECH is the present assignee of the entire right, title and
9 interest in and to the ‘423 patent, including all rights to sue for past and present
10 infringement. Accordingly, DRAM MEMTECH has standing to bring this lawsuit for
11 infringement of the ‘423 patent.
12

13 55. The various claims of the ‘423 patent cover, inter alia, DRAM chips
14 comprising internal data write circuitry including a data mask circuit for inhibiting
15 data writing into at least one memory cell in accordance with a data mask designating
16 signal designating the memory cell to be masked of data writing.
17
18

19 56. On information and belief, ESMT has been and now is infringing the
20 ‘423 patent by actions comprising making, using, selling, offering for sale and/or
21 importing synchronous semiconductor memory devices, namely DRAM chips
22 comprising internal data write circuitry including a data mask circuit for inhibiting
23 data writing into at least one memory cell in accordance with a data mask designating
24 signal designating the memory cell to be masked of data writing, including without
25
26
27
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1 limitation, ESMT's M14D5121632A DDR II SDRAM and M13S256328A DDR
2 SDRAM.

3
4 57. On information and belief, at least since receiving notice of the '423
5 patent, including at a minimum from this lawsuit, ESMT is and/or has been inducing
6 others, including without limitation manufacturers of apparatuses incorporating said
7 DRAM chips and/or resellers of said DRAM chips, to infringe the '423 patent,
8 including without limitation by selling, offering for sale and/or importing said DRAM
9 chips; and further ESMT is and/or has been inducing users to use said chips.
10
11

12 58. On information and belief, at least since receiving notice of the '423
13 patent, including at a minimum from this lawsuit, ESMT is and/or has been
14 contributing to the infringement of others, including without limitation said
15 manufacturers, resellers and/or users, including by selling, offering to sell and/or
16 importing said DRAM chips, at a minimum knowing the same to be especially made
17 or especially adapted for use in an infringement of the '423 patent, and not a staple
18 article or commodity of commerce suitable for substantial noninfringing use.
19
20
21

22 59. Accordingly, on information and belief ESMT is liable for infringement
23 of the '423 patent.

24 60. On information and belief, Etron has been and now is infringing the '423
25 patent by actions comprising making, using, selling, offering for sale and/or importing
26 synchronous semiconductor memory devices, namely DRAM chips comprising
27
28

1 internal data write circuitry including a data mask circuit for inhibiting data writing
2 into at least one memory cell in accordance with a data mask designating signal
3 designating the memory cell to be masked of data writing, including without
4 limitation, Etron's EM68916CWQA DDR II SDRAM and EM6AB160TSA DDR
5 SDRAM.
6
7

8 61. On information and belief, at least since receiving notice of the '423
9 patent, including at a minimum from this lawsuit, Etron is and/or has been inducing
10 others, including without limitation manufacturers of apparatuses incorporating said
11 DRAM chips and/or resellers of said DRAM chips, to infringe the '423 patent,
12 including without limitation by selling, offering for sale and/or importing said DRAM
13 chips; and further Etron is and/or has been inducing users to use said chips.
14
15

16 62. On information and belief, at least since receiving notice of the '423
17 patent, including at a minimum from this lawsuit, Etron is and/or has been
18 contributing to the infringement of others, including without limitation said
19 manufacturers, resellers and/or users, including by selling, offering to sell and/or
20 importing said DRAM chips, at a minimum knowing the same to be especially made
21 or especially adapted for use in an infringement of the '423 patent, and not a staple
22 article or commodity of commerce suitable for substantial noninfringing use.
23
24
25

26 63. Accordingly, on information and belief Etron is liable for infringement of
27 the '423 patent.
28

1 64. On information and belief, ISSI has been and now is infringing the ‘423
2 patent by actions comprising making, using, selling, offering for sale and/or importing
3 synchronous semiconductor memory devices, namely DRAM chips comprising
4 internal data write circuitry including a data mask circuit for inhibiting data writing
5 into at least one memory cell in accordance with a data mask designating signal
6 designating the memory cell to be masked of data writing, including, without
7 limitation, ISSI’s ISSI IS43DR86400B DDR2 SDRAM and IS43/46LR16800E
8 Mobile DDR SDRAM.
9
10
11

12 65. On information and belief, at least since receiving notice of the ‘423
13 patent, including at a minimum from this lawsuit, ISSI is and/or has been inducing
14 others, including without limitation manufacturers of apparatuses incorporating said
15 DRAM chips and/or resellers of said DRAM chips, to infringe the ‘423 patent,
16 including without limitation by selling, offering for sale and/or importing said DRAM
17 chips; and further ISSI is and/or has been inducing users to use said chips.
18
19

20 66. On information and belief, at least since receiving notice of the ‘423
21 patent, including at a minimum from this lawsuit, ISSI is and/or has been contributing
22 to the infringement of others, including without limitation said manufacturers,
23 resellers and/or users, including by selling, offering to sell and/or importing said
24 DRAM chips, at a minimum knowing the same to be especially made or especially
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1 adapted for use in an infringement of the '423 patent, and not a staple article or
2 commodity of commerce suitable for substantial noninfringing use.

3
4 67. Accordingly, on information and belief ISSI is liable for infringement of
5 the '423 patent.

6
7 **COUNT V**

8 **INFRINGEMENT OF U.S. PATENT NO. 6,028,805**

9
10 68. United States Patent No. 6,028,805 ("the '805 patent"), entitled "Volatile
11 Memory and Embedded Dynamic Random Access Memory," issued on February 22,
12 2000.

13
14 69. DRAM MEMTECH is the present assignee of the entire right, title and
15 interest in and to the '805 patent, including all rights to sue for past and present
16 infringement. Accordingly, DRAM MEMTECH has standing to bring this lawsuit for
17 infringement of the '805 patent.

18
19 70. The various claims of the '805 patent cover, inter alia, a volatile memory
20 comprising a means for generating a refresh control signal specifying first and second
21 regions of a memory array in a self refresh mode, and a refresh control means for
22 performing self-refresh for said first region and performing no self-refresh for said
23 second region on the basis of the self refresh control signal in a self-refresh mode.

24
25
26 71. On information and belief, ESMT has been and now is infringing the
27 '805 patent by actions comprising making, using, selling, offering for sale and/or
28

1 importing synchronous semiconductor memory devices, namely volatile memory
2 comprising a means for generating a refresh control signal specifying first and second
3 regions of a memory array in a self refresh mode, and a refresh control means for
4 performing self-refresh for said first region and performing no self-refresh for said
5 second region on the basis of the self refresh control signal in a self-refresh mode,
6 including without limitation, ESMT's M53D128168A Mobile DDR SDRAM and
7 M52S128168 Mobile SDRAM.
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10
11 72. On information and belief, at least since receiving notice of the '805
12 patent, including at a minimum from this lawsuit, ESMT is and/or has been inducing
13 others, including without limitation manufacturers of apparatuses incorporating said
14 volatile memory and/or resellers of said volatile memory, to infringe the '805 patent,
15 including without limitation by selling, offering for sale and/or importing said volatile
16 memory; and further ESMT is and/or has been inducing users to use said chips.
17
18

19 73. On information and belief, at least since receiving notice of the '805
20 patent, including at a minimum from this lawsuit, ESMT is and/or has been
21 contributing to the infringement of others, including without limitation said
22 manufacturers, resellers and/or users, including by selling, offering to sell and/or
23 importing said volatile memory, at a minimum knowing the same to be especially
24 made or especially adapted for use in an infringement of the '805 patent, and not a
25 staple article or commodity of commerce suitable for substantial noninfringing use.
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1 74. Accordingly, on information and belief ESMT is liable for infringement
2 of the '805 patent.

3
4 75. On information and belief, Etron has been and now is infringing the '805
5 patent by actions comprising making, using, selling, offering for sale and/or importing
6 synchronous semiconductor memory devices, namely volatile memory comprising a
7 means for generating a refresh control signal specifying first and second regions of a
8 memory array in a self refresh mode, and a refresh control means for performing self-
9 refresh for said first region and performing no self-refresh for said second region on
10 the basis of the self refresh control signal in a self-refresh mode, including without
11 limitation, Etron's EM68916CWQA DDR II SDRAM.

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15 76. On information and belief, at least since receiving notice of the '805
16 patent, including at a minimum from this lawsuit, Etron is and/or has been inducing
17 others, including without limitation manufacturers of apparatuses incorporating said
18 volatile memory and/or resellers of said volatile memory, to infringe the '805 patent,
19 including without limitation by selling, offering for sale and/or importing said volatile
20 memory; and further Etron is and/or has been inducing users to use said chips.

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23 77. On information and belief, at least since receiving notice of the '805
24 patent, including at a minimum from this lawsuit, Etron is and/or has been
25 contributing to the infringement of others, including without limitation said
26 manufacturers, resellers and/or users, including by selling, offering to sell and/or
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1 importing said volatile memory, at a minimum knowing the same to be especially
2 made or especially adapted for use in an infringement of the '805 patent, and not a
3 staple article or commodity of commerce suitable for substantial noninfringing use.
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5 78. Accordingly, on information and belief Etron is liable for infringement of
6 the '805 patent.
7

8 79. On information and belief, ISSI has been and now is infringing the '805
9 patent by actions comprising making, using, selling, offering for sale and/or importing
10 synchronous semiconductor memory devices, namely volatile memory comprising a
11 means for generating a refresh control signal specifying first and second regions of a
12 memory array in a self refresh mode, and a refresh control means for performing self-
13 refresh for said first region and performing no self-refresh for said second region on
14 the basis of the self refresh control signal in a self-refresh mode, including without
15 limitation, ISSI's IS43DR86400B DDR2 SDRAM.
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19 80. On information and belief, at least since receiving notice of the '805
20 patent, including at a minimum from this lawsuit, ISSI is and/or has been inducing
21 others, including without limitation manufacturers of apparatuses incorporating said
22 volatile memory and/or resellers of said volatile memory, to infringe the '805 patent,
23 including without limitation by selling, offering for sale and/or importing said volatile
24 memory; and further ISSI is and/or has been inducing users to use said chips.
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1 81. On information and belief, at least since receiving notice of the ‘805
2 patent, including at a minimum from this lawsuit, ISSI is and/or has been contributing
3 to the infringement of others, including without limitation said manufacturers,
4 resellers and/or users, including by selling, offering to sell and/or importing said
5 volatile memory, at a minimum knowing the same to be especially made or especially
6 adapted for use in an infringement of the ‘805 patent, and not a staple article or
7 commodity of commerce suitable for substantial noninfringing use.
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11 82. Accordingly, on information and belief ISSI is liable for infringement of
12 the ‘805 patent.

13
14 83. As a result of Defendants’ infringing conduct, Defendants have damaged
15 DRAM MEMTECH. Defendants are liable to DRAM MEMTECH in an amount that
16 adequately compensates DRAM MEMTECH for their infringement, which, by law,
17 can be no less than a reasonable royalty.
18

19 84. DRAM Tech intends to seek discovery on the issue of willfulness, and it
20 reserves the right to seek a willfulness finding relative to pre-suit infringement.
21 Further, to the extent that any Defendant who was previously unaware of the ‘838,
22 ‘831, ‘747, ‘423 or ‘805 patent continues to infringe during the pendency of this suit,
23 such infringement would necessarily be objectively reckless, and thus willful.
24
25

26 85. On information and belief, all Defendants have at least had constructive
27 notice of the ‘838, ‘831, ‘747, ‘423 and ‘805 patents by operation of law, and DRAM
28

1 MEMTECH and any predecessors-in-interest have complied with any marking
2 requirements of 35 U.S.C. § 287 to the extent required by law.

3
4 86. As a consequence of these Defendants' infringement, DRAM
5 MEMTECH has been irreparably damaged and such damage will continue without the
6 issuance of an injunction from this Court.
7

8 **PRAYER FOR RELIEF**

9 WHEREFORE, DRAM MEMTECH respectfully requests that this Court
10 enter:
11

12 1. A judgment in favor of DRAM MEMTECH that Defendants have
13 infringed, directly, jointly, and/or indirectly, by way of inducing and/or contributing
14 to the infringement of the '838, '831, '747, '423 and '805 patents.
15

16 2. A judgment finding that such infringement has been and/or is willful as
17 noted hereinabove, thus entitling DRAM Tech to enhanced damages under 35 U.S.C.
18 § 284;
19

20 3. A permanent injunction enjoining these Defendants, and their officers,
21 directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries,
22 parents, and all others acting in active concert therewith from infringement, inducing
23 the infringement of, or contributing to the infringement of the '838, '831, '747, '423
24 and '805 patents.
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1 4. A judgment and order requiring the Defendants to pay DRAM
2 MEMTECH its damages, costs, expenses, and prejudgment and post-judgment
3 interest for their respective infringements of the '838, '831, '747, '423 and '805
4 patents, as provided under 35 U.S.C. § 284;
5

6 5. A judgment and order finding that this is an exceptional case within the
7 meaning of 35 U.S.C. § 285 and awarding to DRAM MEMTECH its reasonable
8 attorneys' fees; and
9

10 6. Any and all other relief to which DRAM MEMTECH may show itself to
11 be entitled.
12

13 **DEMAND FOR JURY TRIAL**

14 Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial
15 by jury of any issues so triable by right.
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Dated: February 28, 2011

Respectfully submitted,

COLLINS, EDMONDS &
POGORZELSKI, PLLC



John J. Edmonds

Attorney for Plaintiff
DRAM MEMORY TECHNOLOGIES
LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge David O. Carter and the assigned discovery Magistrate Judge is Suzanne H. Segal.

The case number on all documents filed with the Court should read as follows:

SACV11- 332 DOC (SSx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

DRAM MEMORY TECHNOLOGIES LLC

Plaintiff

v.

ELITE SEMICONDUCTOR MEMORY TECHNOLOGY INC.; ETRON TECHNOLOGY AMERICA, INC; ETRON TECHNOLOGY, INC.; AND INTEGRATED SILICON SOLUTION, INC.

Defendant

SACV11-00332 DOC(SSX) Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John J. Edmonds
COLLINS, EDMONDS & POGORZELSKI, PLLC
1851 East First Street, Suite 900
Santa Ana, California 92705

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

MAR - 1 2011

Date:

CLERK OF COURT

Signature of Clerk or Deputy Clerk

Handwritten signature of the Clerk or Deputy Clerk.

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

DRAM MEMORY TECHNOLOGIES LLC

Plaintiff

v.

ELITE SEMICONDUCTOR MEMORY TECHNOLOGY INC.; ETRON TECHNOLOGY AMERICA, INC; ETRON TECHNOLOGY, INC.; AND INTEGRATED SILICON SOLUTION, INC.

Defendant

SACV11-00332 DOC (SSX)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John J. Edmonds
COLLINS, EDMONDS & POGORZELSKI, PLLC
1851 East First Street, Suite 900
Santa Ana, California 92705

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

MAR - 1 2011

Date:

CLERK OF COURT

JULIE PRADO

SEAL

Signature of Clerk or Deputy Clerk

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) DRAM MEMORY TECHNOLOGIES LLC	DEFENDANTS ELITE SEMICONDUCTOR MEMORY TECHNOLOGY INC.; ETRON TECHNOLOGY AMERICA, INC.; ETRON TECHNOLOGY, INC.; AND INTEGRATED SILICON SOLUTION, INC.
(b) Attorneys (Firm Name, Address and Telephone Number, If you are representing yourself, provide same.) John J. Edmonds, COLLINS, EDMONDS & POGORZELSKI, PLLC 1851 East First Street, Suite 900, Santa Ana, California 92705 (951) 708-1237	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify):
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

This action arises under the patent laws of the United States, Title 35 of the United States Code

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACTS <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	CRIMINAL <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: SACV11-00332

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Orange County	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Santa Clara County (Etron Technology America, Inc. and Integrated Silicon Solution, Inc.); Taiwan (Elite Semiconductor Memory Technology Inc and Etron Technology, Inc.)

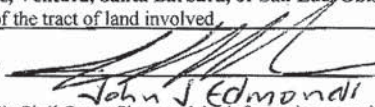
(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Claim I-V : Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER):



Date February 28, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))