

1 Duncan M. McNeill
1514 Van Dyke Avenue
2 San Francisco, CA 94124
Tel.: (650) 994-2295
3 Fax: (650) 994-2297
dmcneill1@netzero.com
4 Fed. Bar No. 136416

5 Attorneys for the Plaintiff
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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11
12 FUZZYSHARP TECHNOLOGIES
13 INCORPORATED,

14 Plaintiff,

15 vs.

16 NVIDIA CORPORATION,

17 Defendant.
18

CV 12 6375
Civil Action No.

**COMPLAINT FOR PATENT
INFRINGEMENT AND DEMAND FOR
JURY TRIAL**

JCS

19 NOW COMES Plaintiff, FUZZYSHARP TECHNOLOGIES INCORPORATED
20 ("FST"), through its attorneys, and files this Complaint for Patent Infringement and Demand for
21 Jury Trial against Nvidia Corporation ("Nvidia"). In support thereof, Plaintiff FST states as
22 follows:
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Complaint for Patent Infringement and Demand for Jury Trial
FuzzySharp Technologies Incorporated v. Nvidia Corporation
Civil Action No.

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1 11. The '047 Patent is assigned entirely to FST.

2 **COUNT ONE**

3 12. Plaintiff FST, repeats and incorporates herein the allegations contained in
4 paragraphs 1 through 11 above.

5 13. Defendant Nvidia is engaged in wilful direct, and/or indirectly infringement of at
6 least one claim of the '679 Patent pursuant to 35 U.S.C. § 271(a) at least by
7 selling, and offering to sell Graphic Processors Units capable of performing
8 occlusion culling during the computer graphics rendering process.

9 14. Plaintiff previously sued Nvidia on November 16, 2009, thereby providing good
10 notice of patent infringement to Nvidia and Nvidia has willfully continued its
11 patent infringement.

12 **COUNT TWO**

13 15. Plaintiff, FST, repeats and incorporates herein the allegations contained in
14 paragraphs 1 through 11 above.

15 16. Defendant Intel is engaged in direct, and/or indirect infringement of at least claim
16 1 of the '0479 Patent pursuant to 35 U.S.C. § 271(a) at least by selling, and
17 offering to sell Graphic Processors Units capable of performing occlusion culling
18 during the computer graphics rendering process.

19 17. Plaintiff previously sued Nvidia on November 16, 2009, thereby providing good
20 notice of patent infringement to Nvidia and Nvidia has willfully continued its
21 patent infringement.

JURY DEMAND

18. Pursuant to Fed. R. Civ. P. 38, Plaintiff hereby demands a jury trial as to all issues in this lawsuit.

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