

ORIGINAL

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 CLERK U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

15
 16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

KAW

18 **C 12 6467**

19 SYNOPSISYS, INC., a Delaware Corporation,

Case No. _____

20 Plaintiff,

**COMPLAINT FOR PATENT
INFRINGEMENT**

21 v.

DEMAND FOR JURY TRIAL

22 MENTOR GRAPHICS CORPORATION, an
23 Oregon Corporation,

24 Defendant.

25
 26 Plaintiff Synopsys, Inc. ("Synopsys") for its Complaint against defendant Mentor
 27 Graphics Corporation ("Mentor") alleges as follows:
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1 persistent courses of conduct, and/or derives substantial revenue from products and/or services
2 provided to individuals in this District and in this State.

3 5. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 1400(b)
4 because Mentor transacts business in this District, is subject to personal jurisdiction in this
5 District, and has committed acts of infringement in this District.

6 **INTRADISTRICT ASSIGNMENT**

7 6. This is an Intellectual Property Action subject to district-wide assignment under
8 Civil Local Rule 3-2(c).

9 **COUNT I**

10 **(Infringement of U.S. Patent No. 5,748,488)**

11 7. Plaintiff incorporates by reference paragraphs 1 through 6 above as if fully set
12 forth herein.

13 8. Synopsys is the owner of all rights, title, and interest in the '488 patent, entitled
14 "Method for Generating a Logic Circuit from a Hardware Independent User Description Using
15 Assignment Conditions," which was duly and legally issued on May 5, 1998. A copy of the '488
16 patent is attached to this Complaint as Exhibit A.

17 9. Mentor has been and is currently directly infringing one or more claims of the
18 '488 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, and selling
19 within the United States, and/or importing into the United States, products and services that
20 practice the inventions claimed in the '488 patent, including specifically the Veloce family of
21 products and their related services, and unless enjoined, will continue to do so.

22 10. Mentor has been and is currently actively inducing and encouraging infringement
23 of at least one claim of the '488 patent in violation of 35 U.S.C. § 271(b), and Mentor will
24 continue to do so unless permanently enjoined. With actual knowledge of the '488 patent at least
25 as of the date of this Complaint, Mentor actively induces and encourages its customers' direct
26 infringement of the '488 patent by instructing said customers to use its products in a manner that
27 directly infringes the '488 patent, including, for example, by instructing said customers to run the
28 Veloce family of products to create, analyze, diagnose, and/or debug integrated circuit designs.

1 Mentor does so with the specific intent to induce and encourage such infringement, or at a
2 minimum with willful blindness to the known risk of such infringement.

3 11. In violation of 35 U.S.C. § 271(c), Mentor has been and is currently contributing
4 to the infringement of the '488 patent by selling and/or offering to sell within the United States
5 and/or importing into the United States products that are material components of systems that
6 practice or embody the invention claimed in the '488 patent, and Mentor will continue to do so
7 unless permanently enjoined. With actual knowledge of the '488 patent at least as of the date of
8 this Complaint, Mentor sells and offers to sell products to its customers, including specifically
9 the Veloce family of products, knowing that these products are especially made or adapted for
10 use in a manner that infringes the '488 patent, and knowing that these products are not staple
11 articles or commodities of commerce suitable for substantial non-infringing use.

12 12. As a direct and proximate consequence of Mentor's infringement of the '488
13 patent, Synopsys has suffered and will continue to suffer irreparable injury for which there is no
14 adequate remedy at law and damages in an amount yet to be determined for which Synopsys is
15 entitled to relief. Under 35 U.S.C. §§ 283 and 284, Synopsys is entitled to recover damages, as
16 well as permanent injunctive relief against further infringement.

17 COUNT II

18 **(Infringement of U.S. Patent No. 5,530,841)**

19 13. Plaintiff incorporates by reference paragraphs 1 through 6 above as if fully set
20 forth herein.

21 14. Synopsys is the owner of all rights, title, and interest in the '841 patent, entitled
22 "Method for Converting a Hardware Independent User Description of a Logic Circuit into
23 Hardware Components," which was duly and legally issued on June 25, 1996. A copy of the
24 '841 patent is attached to this Complaint as Exhibit B.

25 15. Mentor has been and is currently directly infringing one or more claims of the
26 '841 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, and selling
27 within the United States and/or importing into the United States products and services that
28 practice the inventions claimed in the '841 patent, including specifically the Veloce family of

1 products and their related services, and unless enjoined, will continue to do so.

2 16. Mentor has been and is currently actively inducing and encouraging infringement
3 of at least one claim of the '841 patent in violation of 35 U.S.C. § 271(b), and Mentor will
4 continue to do so unless permanently enjoined. With actual knowledge of the '841 patent at least
5 as of the date of this Complaint, Mentor actively induces and encourages its customers' direct
6 infringement of the '841 patent by instructing said customers to use its products in a manner that
7 directly infringes the '841 patent, including, for example, by instructing said customers to run the
8 Veloce family of products to create, analyze, diagnose, and/or debug integrated circuit designs.
9 Mentor does so with the specific intent to induce and encourage such infringement, or at a
10 minimum with willful blindness to the known risk of such infringement.

11 17. In violation of 35 U.S.C. § 271(c), Mentor has been and is currently contributing
12 to the infringement of the '841 patent by selling and/or offering to sell within the United States
13 and/or importing into the United States products that are material components of systems that
14 practice or embody the invention claimed in the '841 patent, and Mentor will continue to do so
15 unless permanently enjoined. With actual knowledge of the '841 patent at least as of the date of
16 this Complaint, Mentor sells and offers to sell products to its customers, including specifically
17 the Veloce family of products, knowing that these products are especially made or adapted for
18 use in a manner that infringes the '841 patent, and knowing that these products are not staple
19 articles or commodities of commerce suitable for substantial non-infringing use.

20 18. As a direct and proximate consequence of Mentor's infringement of the '841
21 patent, Synopsys has suffered and will continue to suffer irreparable injury for which there is no
22 adequate remedy at law and damages in an amount yet to be determined for which Synopsys is
23 entitled to relief. Under 35 U.S.C. §§ 283 and 284, Synopsys is entitled to recover damages, as
24 well as permanent injunctive relief against further infringement.

25 COUNT III

26 **(Infringement of U.S. Patent No. 5,680,318)**

27 19. Plaintiff incorporates by reference paragraphs 1 through 6 above as if fully set
28 forth herein.

1 20. Synopsys is the owner of all rights, title, and interest in the '318 patent, entitled
2 "Synthesizer for Generating a Logic Network Using a Hardware Independent Description,"
3 which was duly and legally issued on October 21, 1997. A copy of the '318 patent is attached to
4 this Complaint as Exhibit C.

5 21. Mentor has been and is currently directly infringing one or more claims of the
6 '318 patent in violation of 35 U.S.C. § 271(a) by making, using, offering to sell, and selling
7 within the United States and/or importing into the United States products and services that
8 practice the inventions claimed in the '318 patent, including specifically the Veloce family of
9 products and their related services, and unless enjoined, will continue to do so.

10 22. Mentor has been and is currently actively inducing and encouraging infringement
11 of at least one claim of the '318 patent in violation of 35 U.S.C. § 271(b), and Mentor will
12 continue to do so unless permanently enjoined. With actual knowledge of the '318 patent at least
13 as of the date of this Complaint, Mentor actively induces and encourages its customers' direct
14 infringement of the '318 patent by instructing said customers to use its products in a manner that
15 directly infringes the '318 patent, including, for example, by instructing said customers to run the
16 Veloce family of products to create, analyze, diagnose, and/or debug integrated circuit designs.
17 Mentor does so with the specific intent to induce and encourage such infringement, or at a
18 minimum with willful blindness to the known risk of such infringement.

19 23. In violation of 35 U.S.C. § 271(c), Mentor has been and is currently contributing
20 to the infringement of the '318 patent by selling and/or offering to sell within the United States
21 and/or importing into the United States products that are material components of systems that
22 practice or embody the invention claimed in the '318 patent, and Mentor will continue to do so
23 unless permanently enjoined. With actual knowledge of the '318 patent at least as of the date of
24 this Complaint, Mentor sells and offers to sell products to its customers, including specifically
25 the Veloce family of products, knowing that these products are especially made or adapted for
26 use in a manner that infringes the '318 patent, and knowing that these products are not staple
27 articles or commodities of commerce suitable for substantial non-infringing use.
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Dated: December 21, 2012



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Attorneys for Plaintiff
SYNOPSISYS, INC.

DEMAND FOR JURY TRIAL

Plaintiff Synopsisys, Inc. demands a trial by jury of all issues so triable.

Dated: December 21, 2012



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