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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

INVENSAS BONDING TECHNOLOGIES,
INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,
INC., and
SAMSUNG ELECTRONICS CO., LTD.,

Defendants.

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) Civil Action No.: _____
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JURY TRIAL DEMANDED

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COMPLAINT

Plaintiff Invensas Bonding Technologies, Inc. (“Invensas Bonding” or “Plaintiff”) brings this patent infringement action against Defendants Samsung Electronics America, Inc. (“SEA”), with a principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey 07660, and Samsung Electronics Co., Ltd. (“SEC”), with a principal place of business in the Republic of Korea (collectively, “Samsung”) as follows:

NATURE OF THE ACTION

1. This is a civil action for infringement of United States Patent Nos. 7,553,744 (the “744 patent”), 7,807,549 (the “549 patent”), 7,871,898 (the “898 patent”), 8,153,505 (the “505 patent”), 9,391,143 (the “143 patent”), and 9,431,368 (the “368 patent”) (collectively, the “Asserted Patents”) under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

THE PARTIES

2. Plaintiff Invensas Bonding Technologies, Inc. (“Invensas Bonding”) is a Delaware corporation with its principal place of business at 3025 Orchard Parkway, San Jose, California, 95134.

3. Defendant SEA is a New York corporation with its principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey 07660. SEA is a wholly-owned subsidiary of SEC. SEA’s registered agent, The Corporation Trust Company, is located at Corporation Trust Center, 111 Eighth Avenue, New York, New York, 10011.

4. Defendant SEC is a company organized under the laws of the Republic of Korea with its principal place of business located at 129 Samsung-ro, Maetan-3dong, Yeongtong-gu, Suwon-si, Gyeonggi-do, 443-742 in the Republic of Korea.

JURISDICTION AND VENUE

5. The Court has subject matter jurisdiction over these claims under 28 U.S.C. §§ 1331 and 1338(a) and the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

6. The Court has personal jurisdiction over each of the Defendants consistent with the requirements of the Due Process Clause of the United States Constitution and the New Jersey Long Arm Statute. On information and belief, each Defendant has regularly and systematically transacted business in New Jersey, directly or through subsidiaries or intermediaries, and/or committed acts of patent infringement in New Jersey as alleged more particularly below. Each Defendant has also placed infringing products into the stream of commerce by shipping those products into New Jersey or knowing that the products would be shipped into New Jersey.

7. Venue is proper in this district under 28 U.S.C. § 1400(b) because SEA has committed acts of infringement in and has its principal place of business within this district. For instance, SEA's self-identified headquarters are located at 85 Challenger Road, Ridgefield Park, New Jersey 07660. Venue is proper for defendant SEC, a Korean company, because suits against foreign entities are proper in any judicial district.

THE ASSERTED PATENTS

8. The '744 patent is entitled "Method for low temperature bonding and bonded structure," and issued on June 30, 2009 to inventors Qin-Yi Tong, Gaius Gillman Fountain, Jr., and Paul M. Enquist. Invensas Bonding owns the entire right, title, and interest in and to the '744 patent.

9. The '549 patent is entitled "Method for low temperature bonding and bonded structure," and issued on October 5, 2010 to inventors Qin-Yi Tong, Gaius Gillman Fountain, Jr.,

and Paul M. Enquist. Invensas Bonding owns the entire right, title, and interest in and to the '549 patent.

10. The '898 patent is entitled "Method for low temperature bonding and bonded structure," and issued on January 18, 2011 to inventors Qin-Yi Tong, Gaius Gillman Fountain, Jr., and Paul M. Enquist. Invensas Bonding owns the entire right, title, and interest in and to the '898 patent.

11. The '505 patent is entitled "Method for low temperature bonding and bonded structure," and issued on April 10, 2012 to inventors Qin-Yi Tong, Gaius Gillman Fountain, Jr., and Paul M. Enquist. Invensas Bonding owns the entire right, title, and interest in and to the '505 patent.

12. The '143 patent is entitled "Method for low temperature bonding and bonded structure," and issued on July 12, 2016 to inventors Qin-Yi Tong, Gaius Gillman Fountain, Jr., and Paul M. Enquist. Invensas Bonding owns the entire right, title, and interest in and to the '143 patent.

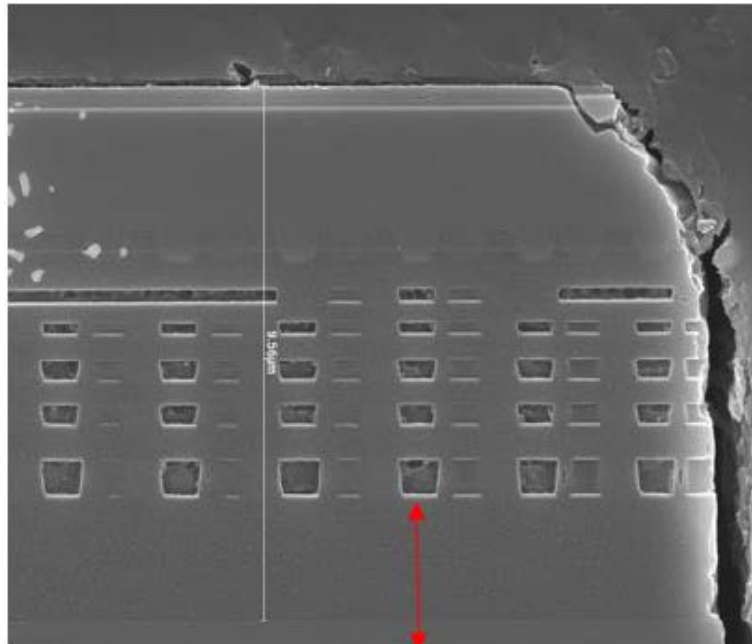
13. The '368 patent is entitled "Three dimensional device integration method and integrated device," and issued on August 30, 2016 to inventors Paul M. Enquist and Gaius Gillman Fountain, Jr. Invensas Bonding owns the entire right, title, and interest in and to the '368 patent.

CLAIMS FOR PATENT INFRINGEMENT

14. The allegations provided below are exemplary and without prejudice to Plaintiff's infringement contentions provided pursuant to the Court's scheduling order and local civil rules. In providing these allegations, Plaintiff does not convey or imply any particular claim constructions or the precise scope of the claims. Plaintiff's claim construction contentions

regarding the meaning and scope of the claim terms will be provided under the Court's scheduling order and local civil rules.

15. The accused products include, but are not limited to, Samsung's Galaxy S6, S7, and S8 devices (collectively, the "Accused Products"). On information and belief, the Accused Products include one or more infringing bonded semiconductor devices, such as image sensors and accelerometers. A scanning electron microscope (SEM) image of a cross-section of an exemplary infrared image sensor taken from a Galaxy S8 is shown below.



16. The images below include the results of a secondary ion-mass spectrometry (SIMS) analysis performed on the above-depicted image sensor, with the region of interest indicated by the red arrow. As shown below, two wafers are bonded together without adhesives. The device wafer (to the right of the bond interface at 0 nm) includes two oxide layers adjacent to the bond interface, the first starting at roughly 0 nm in the SIMS plot below, and the second starting at roughly 750 nm.

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