

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

BELL SEMICONDUCTOR, LLC,

Plaintiff,

v.

TEXAS INSTRUMENTS INCORPORATED,

Defendants.

Civil Action No. 2:20-cv-00048

**JURY TRIAL DEMANDED**

**BELL SEMICONDUCTOR, LLC'S  
COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Bell Semiconductor, LLC (“Bell Semic”) as and for its complaint against Texas Instruments Incorporated alleges as follows:

**INTRODUCTION**

1. Bell Semic is a technology and intellectual property licensing company. Bell Semic’s patent portfolio comprises over 1,900 worldwide patents and applications, approximately 1,500 of which are active United States patents. This patent portfolio of semiconductor-related inventions was developed over many years by some of the world’s leading semiconductor technology innovators, including AT&T Bell Laboratories, Lucent Technologies (Lucent), Agere Systems (Agere), LSI Logic and LSI Corporation (LSI). The portfolio reflects expertise developed at the various R&D laboratories and manufacturing locations of these companies around the world. The technology created, developed, and patented at those companies underlies many important innovations in the development of semiconductors and integrated circuits for high-tech products, including smartphones, computers, wearables, digital signal processors, IoT devices, automobiles, broadband carrier access, switches, network processors and wireless connectors.

2. Bell Semic was formed in 2017 to manage this portfolio of semiconductor-related intellectual property acquired from Broadcom and assigned to Bell Semic. Several Bell Semic executives previously served as engineers and in leadership roles within the intellectual property departments of Lucent, Agere, LSI, Avago Technologies (Avago), and Broadcom. As a result, Bell Semic executives were personally involved in creating, patenting, and licensing various aspects of the portfolio even before Broadcom assigned it to Bell Semic, including:

- Bell Semic's Chief Executive Officer and Board Member, Mr. John Veschi, served as General Manager of the Intellectual Property business at LSI, had similar responsibilities at Agere, and began his in-house intellectual property experience with the formation of Lucent.
- Bell Semic's President and General Counsel, Mr. Chad Hilyard, served as Managing IP Counsel and in other roles at LSI and Agere, where he was involved in licensing many of the patents in the portfolio now assigned to Bell Semic;
- Bell Semic's Chief Technology Officer, Dr. Sailesh Merchant was a Fellow at Broadcom, Avago, and LSI Corporation; a Distinguished Engineer at LSI Corporation; and a Distinguished Member of the Technical Staff of Agere and Lucent. Dr. Merchant is also a Senior Member of the IEEE and an inventor on more than 250 worldwide patents—including many of the patents in Bell Semic's portfolio—and three of the patents asserted in this Complaint;
- Bell Semic's Senior Director for IP, Mr. Kouros Azimi, served as a Member of the Technical Staff at AT&T Bell Labs, Lucent, and Agere; Director of Intellectual Property at Avago/Broadcom, and a Patent Engineer and Director of Patent Development at LSI/Avago Technologies.

3. Defendant Texas Instruments Incorporated (“TI” or “Defendant”) has infringed and continues to infringe Bell Semic’s patents by making, using, selling, offering for sale, and/or importing products (including importing products made by a patented process) throughout the United States, including within this District. TI’s customers incorporate those products into downstream products that are made, used, sold, offered for sale, and/or imported throughout the United States and within this District. Such downstream products include, but are not limited to, power and display drivers for LCD and OLED displays, audio amplifiers and processors, wireless products for the Internet-of-Things, mmWave sensors used in automotive and industrial settings, digital signal processors, high-performance microcontrollers, and Digital Light Projectors (DLP), among others. Examples of infringing TI devices used in such downstream products include TI’s DRV2624 haptic motor driver for the Google Pixel 2; TI’s TPS65912 power management device used in the cutting-edge Magic Leap 1 headset; and TI’s DLP3010AFQK 720p digital-mirror-device in Sunty’s SP-001 Digital Light Processor projector.

4. Bell Semic has notified TI of its infringement in writing more than once—but TI has never responded or acknowledged Bell Semic or its intellectual property. Instead, TI has continued to infringe, and thus its infringement is and has been willful under the Patent Act.

#### **NATURE OF THE CASE**

5. This action arises under 35 U.S.C. § 271 for TI’s infringement of Bell Semic’s United States Patent Nos. 8,049,340 (“the Hall 340 Patent”); 8,288,269 (“the Hall 269 Patent”); 7,566,964 (“the Kang Patent”); 6,281,129 (“the Merchant Patent”); 6,596,639 (“the Easter Patent”); 6,879,046 (“the Gibson Patent”); 6,707,132 (“the Banerjee Patent”); 6,544,907 (“the Ma Patent”); and 6,492,712 (“the Chen Patent”) (collectively, Bell Semic’s “Asserted Patents”).

### **PARTIES**

6. Bell Semiconductor, LLC is a Delaware limited liability company with a place of business at One West Broad Street, Suite 901, Bethlehem, PA 18018.

7. On information and belief, TI is a corporation organized under the laws of Delaware, with a principal place of business at 12500 TI Boulevard, Dallas, TX 75243. TI may be served with process through its registered agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201.

8. TI is a global semiconductor company that designs, manufactures, and provides to the United States and other markets a wide variety of semiconductors, including a wide array of analog and embedded semiconductor products.

### **JURISDICTION AND VENUE**

9. This action arises under the patent laws of the United States, Title 35 of the United States Code. Accordingly, this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

10. This Court has general personal jurisdiction over TI at least because TI is a resident of Texas as defined by Texas law. TI is also subject to this Court's specific and general personal jurisdiction because TI has sufficient minimum contacts within the State of Texas and this District, pursuant to due process and/or the Texas Long Arm Statute. TI is headquartered in the State of Texas, and TI has conducted and continues to regularly conduct business within the State of Texas. TI is registered to do business within the State of Texas and maintains an agent for service of process in Texas. TI has purposefully and voluntarily availed itself of the privileges of conducting business in the United States, in the State of Texas, and in the Eastern District of Texas by continuously and systematically placing goods into the stream of commerce through an established distribution channel with the expectation that they will be purchased by

consumers in the United States and in the Eastern District of Texas. TI directly and/or through intermediaries (including distributors, sales agents, and others), ships, distributes, offers for sale, sells, advertises, and/or uses its products (including, but not limited to, the products that are accused of patent infringement in this lawsuit) in the United States, the State of Texas, and the Eastern District of Texas.

11. TI has derived substantial revenues from its infringing acts occurring within the United States, the State of Texas and within this District.

12. Venue is proper as to TI under 28 U.S.C. § 1400(b) because it has committed acts of infringement in this District and has regular and established places of business within this District. *TC Heartland LLC v. Kraft Foods Grp. Brands LLC*, 137 S. Ct. 1514, 1521 (2017). Specifically, TI maintains a 300-millimeter semiconductor production facility at 300 West Renner Road, Richardson, Texas 75080, and a 150-millimeter semiconductor production facility at 6412 US-75, Sherman, Texas 75090.

13. TI has not disputed this District's personal jurisdiction over it in other recent patent infringement actions, nor has TI disputed that venue is proper as to it in the Eastern District of Texas. *See, e.g.*, Answer [ECF 14] at ¶¶ 8 & 13, *Phenix Longhorn, LLC v. Texas Instruments, Inc.*, No. 2:18-cv-00020-RWS (E.D. Tex. Jan. 22, 2018); Answer [ECF 23] at ¶¶ 6 & 7, *Complex Memory, LLC v. Texas Instruments, Inc. et al.*, No. 2:17-cv-00699-JRG (E.D. Tex. Oct. 13, 2017).

14. TI has committed acts of infringement in this District giving rise to this action and does business in this District, including making sales and/or providing service and support for its respective customers in this District. TI purposefully and voluntarily sold one or more of the infringing products with the expectation that they would be purchased by consumers in this

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