

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JAMES B. GOODMAN,

Plaintiff

v.

DELL INC., DELL TECHNOLOGIES, INC. and
DELL TECHNOLOGIES, LLC,

Defendants

Case No. 6:20-cv-00703

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff James B. Goodman (“Plaintiff” or “Goodman”) hereby files this Original Complaint for Patent Infringement against Defendants Dell Inc., Dell Technologies, Inc. and Dell Technologies, LLC (“Defendant” or “Dell”), and alleges, on information and belief, as follows:

THE PARTIES

1. James Goodman is an individual residing in the State of Texas.
2. On information and belief, Defendant Dell Inc. is a company organized and existing under the laws of Delaware, with a principal place of business at 1 Dell Way, Round Rock, Texas 78682. Dell Inc. may be served through its registered agent, Corporation Service Company, at 211 E. 7th Street, Suite 620, Austin, Texas 78701.
3. On information and belief, Defendant Dell Technologies, Inc. is a company organized and existing under the laws of Delaware, with a principal place of business at 1 Dell Way, Round

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Rock, Texas 78682. Dell Inc. may be served through its registered agent, Corporation Service Company, at 251 Little Falls Drive, Wilmington, Delaware 19808.

4. On information and belief, Defendant Dell Technologies, LLC is a company organized and existing under the laws of Delaware, with a principal place of business at 1 Dell Way, Round Rock, Texas 78682. Dell Inc. may be served through its registered agent, Registered Agents, Ltd., at 1013 Centre Road, Suite 403-A, Wilmington, Delaware 19805.

JURISDICTION AND VENUE

5. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, 1332 and 1338(a).

6. Defendant has committed acts of infringement in this judicial district.

7. On information and belief, Defendant maintains regular and systematic business interests in this district and throughout the State of Texas including through its representatives, employees and physical facilities.

8. On information and belief, the Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in the State of Texas, has conducted business in the State of Texas, and/or has engaged in continuous and systematic activities in the State of Texas. On information and belief, Defendant's accused instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the Western District of Texas.

9. On information and belief, Defendant voluntarily conducts business, has 71 job openings currently in Austin, Texas and Round Rock, Texas within this District, including, but not limited to, its headquarters located at 1 Dell Way, Round Rock, Texas 78682. *See, e.g.:*



US Corporate Headquarters

1 Dell Way, Round Rock, TX 78664

Dell website as visited on July 23, 2020: <https://www.delltechnologies.com/en-us/contactus.htm>.

Dell Corporate Office Address



Dell Corporate Office Headquarters Address, Email, Phone Number

DELL HEADQUARTERS ADDRESS | DELL CORPORATE PHONE NUMBERS

Dell Headquarters | Dell Round Rock Address

One Dell Way Round Rock, TX 78682, USA.

Source as visited on July 23, 2020 at: <https://headquarters-address.com/dell-corporate-office-headquarters-address-email-phone-number/>.

71 open positions in "Austin, Texas"

POSITION	BRAND	LOCATION
Senior Principal Front-End Developer - Cloud Platform Team	Dell Technologies	Seattle, Washington >
Lead Software Architect / Technical Leader: Endpoint Sensors - Secureworks - Austin, TX; Atlanta, GA; US Remote	Secureworks	Austin, Texas >
Senior Security Researcher - Endpoint - Secureworks - Remote	Secureworks	Atlanta, Georgia >
Staff Engineer II - Bitfusion (Accelerator Virtualization Group)	VMware	Austin, Texas >
Technical Staff: Cloud Architect	Dell Technologies	Seattle, Washington >
Senior Product Manager: On-Premise Private & Hybrid Cloud (IaaS-Virtualization & Containers)	Dell Technologies	Austin, Texas >

Dell website as visited on July 23, 2020 at: <https://jobs.dell.com/search-jobs/Austin%2C%20Texas/375-30225/4/6252001-4736286-4737316-4671654/30x26715/-97x74306/50/2>.

71 open positions in "Round Rock, Texas"

POSITION	BRAND	LOCATION
Senior Technician, Technical Support	Dell Technologies	Round Rock, Texas >
Senior Cloud Product Manager	Dell Technologies	Round Rock, Texas >

Dell website as visited on July 23, 2020 at: <https://jobs.dell.com/search-jobs/Round%20Rock%2C%20Texas/375-30225/4/6252001-4736286-4742143-4724129/30x50826/-97x6789/50/2>

10. On information and belief, Defendant generates substantial revenue within this District and from the acts of infringement as carried out in this District. As such, the exercise of jurisdiction over Defendant would not offend the traditional notions of fair play and substantial justice.

11. Venue is proper in the Western District of Texas pursuant to 28 U.S.C. § 1400(b) and 28 U.S.C. § 1391(c)(3).

NOTICE OF GOODMAN'S PATENTS

12. Goodman is the inventor and owner of U.S. Patent No. 4,617,624B2 (“the ’624 Patent”) entitled “Multiple configuration memory circuit.” A copy may be obtained at:

<https://patents.google.com/patent/US4617624A/>

13. Goodman is the inventor and owner of U.S. Patent No. 6,243,315B1 (“the ’315 Patent” and “the Patent-in-Suit”) entitled “Computer memory system with a low power down mode.” A copy may be obtained at:

<https://patents.google.com/patent/US6243315B1/en?q=6%2c243%2c315>.

14. Goodman is the co-inventor and owner of U.S. Patent No. 6,257,911B1 (“the ’911 Patent”) entitled “Low insertion force connector with wipe.” A copy may be obtained at:

<https://patents.google.com/patent/US6257911>.

15. The foregoing Patents are collectively referred to as “the Goodman Patents.”

16. The Goodman Patents are valid, enforceable, and were duly issued in full compliance with Title 35 of the United States Code.

17. Defendants, at least by the date of this Original Complaint, are on notice of the Goodman Patents.

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