

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

SONRAI MEMORY LIMITED,

Plaintiff,

v.

LENOVO GROUP LTD.; MOTOROLA
MOBILITY LLC,

Defendants.

Case No. 6:22-cv-00029

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT
AGAINST LENOVO GROUP LTD.; MOTOROLA MOBILITY LLC.**

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Sonrai Memory Limited (“Plaintiff” or “Sonrai”) makes the following allegations against Defendants Lenovo Group Ltd. and Motorola Mobility LLC (“Defendants”):

INTRODUCTION

1. This complaint arises from Defendants’ unlawful infringement of the following United States patent owned by Plaintiff, which relates to improvements in computer chip architecture having multiple processors on a single die: United States Patent No. 6,874,014 (“’014 Patent” or the “Asserted Patent”).

PARTIES

2. Plaintiff Sonrai Memory Limited is a limited liability company organized and existing under the law of Ireland, with its principal place of business at The Hyde Building, Suite

23, The Park, Carrickmines, Dublin 18, Ireland. Sonrai is the sole owner by assignment of all right, title, and interest in the Asserted Patent.

3. On information and belief, Defendant Lenovo Group Ltd. is organized under the laws of the People's Republic of China, with its principal place of business at 6 Chuang ye Road, Haidan District, Beijing 100085, China.

4. On information and belief, Defendant Motorola Mobility LLC is a limited liability company organized under the laws of the State of Delaware, with its principal office at 222 W. Merchandise Mart Plaza, Suite 1800, Chicago, Illinois 60654.

JURISDICTION AND VENUE

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

6. This Court has personal jurisdiction over Defendants in this action because each Defendant has committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Defendants would not offend traditional notions of fair play and substantial justice. Defendants, directly and through subsidiaries or intermediaries, have each committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the asserted patents.

7. Venue is proper in this District under 28 U.S.C. §1400 (b). Defendant Motorola Mobility LLC is registered to do business in Texas, and upon information and belief, has transacted business in this District and has committed acts of direct and indirect infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the asserted

patents. On information and belief, Defendant Lenovo Group Ltd. has also committed such acts of direct and indirect infringement, on its own and through its subsidiary Motorola Mobility LLC. On information and belief, Motorola Mobility LLC has regular and established places of business in the District, as evidenced by its job listing for an “Android Software Developer” position in Austin, TX. *See* Exhibit 1.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,874,014

8. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

9. Plaintiff owns by assignment all rights, title, and interest in U.S. Patent No. 6,874,014, entitled “Chip Multiprocessor with Multiple Operating Systems.” The ’014 Patent was duly and legally issued by the United States Patent and Trademark Office on March 29, 2005. A true and correct copy of the ’014 Patent is attached as Exhibit 2.

10. On information and belief, Defendants make, use, offer for sale, sell, and/or import certain products and services, including without limitation mobile phones with Qualcomm Snapdragon SoCs containing at least one Hexagon DSP, including without limitation the Motorola Edge (“Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’014 Patent.

11. The Accused Products satisfy all claim limitations of one or more claims of the ’014 Patent. A claim chart comparing exemplary independent claim 1 of the ’014 Patent to representative Accused Products is attached as Exhibit 3 and incorporated by reference herein.

12. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Defendants have injured Plaintiff and is liable for infringement of the '014 Patent pursuant to 35 U.S.C. § 271.

13. As a result of Defendants' infringement of the '014 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Defendants' infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that each Defendant has infringed, either literally and/or under the doctrine of equivalents, the '014 Patent;
- b. A judgment and order requiring each Defendant, jointly and severally, to pay Plaintiff its damages, costs, expenses, and pre-judgment and post-judgment interest for Defendants' infringement of the '014 Patent; and
- d. A judgment and order requiring each Defendant, jointly and severally, to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest;
- e. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Defendants, jointly and severally; and
- f. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: January 7, 2022

Respectfully submitted,

/s/ Reza Mirzaie

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