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Filed

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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 *cl*
12 DYNETIX DESIGN SOLUTIONS INC., a
13 California corporation,

14 Plaintiff,

15 vs.

16 SYNOPSYS INC., a Delaware corporation, and
17 DOES 1-50

18 Defendants.

Case No.

11-05973

COMPLAINT FOR PATENT
INFRINGEMENT

PSG



PARTIES AND NATURE OF ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, as alleged by Plaintiff Dynetix Design Solutions Inc. ("Dynetix") against defendant Synopsys Inc. ("Synopsys") and defendants Does 1 through 50. Synopsys and Does 1-50 are collectively referred to as the "Defendants" hereinafter.

2. Dynetix is a California corporation with its principal place of business at 3268 Ridgely Way, Dublin, California 94568.

3. On information and belief, Synopsys is a Delaware corporation that has its principal place of business located at 700 East Middlefield Road, Mountain View, California 94043-4033.

4. Defendants Does 1 through 50 include Synopsys' customers and licensees who have used Synopsys' infringing products or services. Defendants Does 1 through 50 may also include distributors, contractors, and other individuals and entities who have acted on behalf of Synopsys in making, using, selling or offering for sell Synopsys' infringing products or services. The identities of Does 1 through 50 will be revealed through discovery.

JURISDICTION AND VENUE

5. This Court has personal jurisdiction over Defendant Synopsys which has its principal place of businesses located in Mountain View, California.

6. This Court has the original subject matter jurisdiction over this action pursuant to 35 U.S.C. § 100 *et seq.*, and 28 U.S.C. § 1338(a).

7. Venue is proper in the Northern District of California pursuant to 28 U.S.C. 1391(b)(1) & 1391(b)(2) because Synopsys resides in this judicial district and a substantial part of the events or omissions giving rise to the claim occurred in this judicial district.

CAUSE OF ACTION

Infringement of U.S. Patent No. 6,466,898

8. Dynetix is an electronic design automation (EDA) company. It specializes in the development of state-of-the-art design verification tools to solve the most challenging design issues

1 for deep submicron System-on-Chip (SoC), Application-Specific Integrated Circuit (ASIC), Field-
2 Programmable Gate Array (FPGA) and custom Integrated Circuit (IC) products.

3 9. Dynetix is the owner by assignment of United States Patent No. 6,466,898 (“the ‘898
4 Patent”). The ‘898 patent was duly and legally issued by the United States Patent and Trademark
5 Office on October 15, 2002, based on an application with the priority date of January 12, 1999. A
6 true and correct copy of the ‘898 patent is attached as Exhibit A.

7 10. The inventor of the ‘898 Patent is Terrance Chan, who is also the founder and Chief
8 Executive Officer of Dynetix.

9 11. The ‘898 Patent covers, among other things, logic simulators that support multiple
10 hardware description languages such as VHDL¹ and Verilog in a single program, and that use
11 multithreaded methods to accelerate the simulator's performance on multiprocessor platforms. The
12 ‘898 Patent also teaches methods of remote logic simulation over intranets and the Internet, which are
13 important features of cloud services for logic simulation. These inventions of the ‘898 Patent
14 significantly reduce the development time of the complicated integrated circuits such as
15 microprocessors, and are thus of great values to integrated circuit developers.

16 12. Dynetix practices the inventions claimed in the ‘898 Patent, by making and selling
17 V2Sim and RaceCheck, which are the industry-first, 32/64-bit design verification tools that
18 seamlessly verify deep-submicron integrated circuit designs coded in any combination of hardware
19 description languages including VHDL, Verilog, SystemVerilog, SystemC and PSL². Dynetix has
20 properly marked the products with the ‘898 Patent since their inception.

21 13. Synopsys directly infringes the ‘898 Patent. Synopsys uses, makes, licenses, sells, and
22 offers to sell VCS Multicore and VCS Cloud, which are simulation tools for IC design codes written
23 in various HDL languages including SystemVerilog, Verilog, VHDL and Open Vera. Exhibit B is a
24 brief description of the VCS Multicore printed from Synopsys’ website, www.synopsys.com. Exhibit
25 C and D are Data Sheets for VCS and VCS Cloud, also available on Synopsys’ website.

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27 ¹ VHDL stands for VHSIC Hardware Description Language, where VHSIC is an acronym for Very High Speed
Integrated Circuit.

28 ² PSL stands for Property Specification Language.

14. Synopsys' infringement of the '898 Patent is willful. In 2006, when Dynetix first learned of Synopsys' plan to develop multi-threaded VCS, Dynetix sent Synopsys a letter requesting its licensing of the '898 Patent. Attached as Exhibit E is a true and correct copy of Dynetix's letter to Synopsys. In response to the letter, Synopsys denied that it was planning to develop multithreaded VCS and refused to take a license to the '898 Patent. Attached as Exhibit F is a true and correct copy of the response letter from Synopsys.

15. Besides direct infringement, Synopsys also infringes the '898 Patent by actively inducing its customers and licensees to infringe the patent.

16. Synopsys' customers and licensees, who are among Defendants Does 1 through 50, directly infringe the '898 Patent by using VCS Multicore and VCS Cloud in product developments.

17. Defendants' infringement of the '898 patent has caused significant damages to Dynetix in terms of lost profits and lost royalties.

PRAYER FOR RELIEF

18. WHEREFORE, Plaintiff Dynetix prays for relief against Defendants as follows:

- a. The Court shall grant permanent injunction against Defendants, their agents, attorneys, representatives, and those acting in concert with Defendants, pursuant to 35 U.S.C. § 283;
- b. The Court shall award compensatory damages according to the proof, including treble damages under 35 U.S.C. § 284;
- c. The Court shall declare the case as an exceptional case under 35 U.S.C. § 285, and award Dynetix reasonable attorney's fees according to the proof;
- d. The Court shall award prejudgment interest at the maximum legal rate as allowed by the law;
- e. The Court shall award costs of suit herein incurred; and
- f. The Court shall award such other and further relief as the Court may deem proper.

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JURY DEMAND

19. Plaintiff Dynetix hereby demands a trial by jury on all issues so triable.

DATED: December 5, 2011

LiLAW

By



J. James Li, Ph.D.
Attorneys for Plaintiff
Dynetix Design Solutions, Inc.