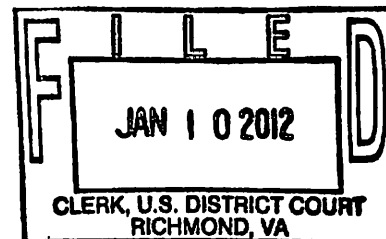


**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**



DR. MICHAEL JAFFÉ
in his capacity as Insolvency
Administrator over the assets of
QIMONDA AG,

Plaintiff,

v.

LSI CORPORATION,

Defendant.

Civil Action No. 3:12CV025
Related to Civil Action No.: 3:08-CV-735

COMPLAINT FOR PATENT INFRINGEMENT

For its Complaint against Defendant LSI Corporation (“LSI”), Plaintiff Dr. Michael Jaffé in his capacity as Insolvency Administrator over the assets of Qimonda AG alleges as follows:

NATURE OF THE CASE

1. Plaintiff seeks injunctive relief and damages for acts of patent infringement by LSI, in violation of the patent laws of the United States.

PARTIES AND JURISDICTION

2. This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code. The Court’s jurisdiction is proper under 35 U.S.C. §§ 271, et seq., and 28 U.S.C. §§ 1331 and 1338(a).

3. Qimonda AG is a German corporation having a principal place of business at Gustav-Heinemann-Ring 212, 81739 Munich, Germany. On January 23, 2009, Qimonda AG

filed to open insolvency proceedings with the Munich Local Court – Insolvency Court (*Amtsgericht München – Insolvenzgericht*), Germany (the “Insolvency Court”). On April 1, 2009, the Insolvency Court issued an Order that opened insolvency proceedings over the estate of Qimonda AG, and appointed Dr. Michael Jaffé as the insolvency administrator.

4. Qimonda AG previously manufactured integrated circuits in North America at Qimonda Richmond LLC, a wholly-owned subsidiary of Qimonda AG, and which had a principal place of business at 6000 Technology Boulevard, Richmond, Virginia (“Qimonda Richmond”), within this judicial district. On February 20, 2009, Qimonda Richmond filed for Chapter 11 bankruptcy protection in the U.S. Bankruptcy Court for the District of Delaware. Qimonda Richmond, as of at least the time of the filing of the related complaint in this action, comprised a state-of-the-art semiconductor manufacturing facility that manufactured semiconductor integrated circuits according to many of Qimonda AG’s patented inventions identified in this Complaint, employed over two-thousand employees, and was a location where Qimonda AG and its related companies conducted research and development. Qimonda Richmond’s facilities closed in 2009.

5. On June 15, 2009, Dr. Michael Jaffé, in his capacity as Insolvency Administrator over the assets of Qimonda AG, filed in this Judicial District a proceeding under Chapter 15, Title 11 of the United States Code, seeking recognition of the German insolvency proceedings of Qimonda AG (Case No. 09-14766-RGM, U.S. Bankruptcy Court for the Eastern District of Virginia, Alexandria Division). On July 22, 2009, the U.S. Bankruptcy Court issued an order granting Dr. Jaffé’s petition, recognizing the German insolvency proceeding as a foreign main proceeding. On the same day, the U.S. Bankruptcy Court issued a supplemental order stating, among other things, that Dr. Jaffé “shall be the sole and exclusive representative of Qimonda AG

in the United States and shall administer the assets of Qimonda AG within the territorial jurisdiction of the United States." LSI has represented to this Court that when the "German [insolvency] proceeding opened on April 1, 2009, Dr. Jaffé became the owner and manager of Qimonda's estate." LSI further represented that the U.S. recognition of this foreign proceeding "allows the foreign representative [Dr. Jaffé] to sue and be sued in the United States courts", that "Dr. Jaffé, alone, is responsible for liquidating Qimonda's assets, a process that includes asserting claims against alleged patent infringers," and that "Dr. Jaffé has all substantive rights in the patents." Plaintiff Dr. Michael Jaffé, in his capacity as Insolvency Administrator over the assets of Qimonda AG, is the proper plaintiff in this action with standing to assert Qimonda AG's patents against infringers, and to collect past and future damages for such infringement.

6. On information and belief, LSI is a California corporation having a principal place of business at 1621 Barber Lane, Milpitas, California 95035.

7. This court has personal jurisdiction over LSI because it conducts, transacts, and/or solicits business within this judicial district. Upon information and belief, LSI has infringed and continues to infringe one or more claims of the patents-in-suit within this judicial district by engaging in substantial activities, including selling and/or offering to sell the infringing product at least via distribution channels in this judicial district. Infringing products were purchased by at least one representative for Qimonda AG in this District and received in this District, including at least a LSI20320-R, which contained a LSI53c1020 integrated circuit, a LSI22320-R, which contained a LSI53c1030 integrated circuit, and a MegaRAID SAS 8204ELP, which contained a LSISAS1068 integrated circuit. Infringing products were purchased in this District, including at least a LSI20320-R, which contained a LSI53c1020 integrated circuit, a LSI22320-R, which contained a LSI53c1030 integrated circuit, and a MegaRAID SAS 8204ELP, which contained a

LSISAS1068 integrated circuit. Personal jurisdiction is also proper because LSI, acting alone or in concert with third parties, has intentionally caused and continues to cause injury in this judicial district.

8. Venue lies in the Eastern District of Virginia pursuant to 28 U.S.C. §§ 1391(b) and (c), § 1400(b) and § 1409(a).

GENERAL ALLEGATIONS

9. LSI is a developer and provider of integrated circuits and products containing the same. LSI has previously offered and/or is now currently offering Storage Component and Networking Component products.¹ On information and belief, such LSI products have been and/or are sold through retailers, including Office Depot, in this division of this Judicial District.

10. On information and belief, LSI's Storage Component Products include and/or have included Host Bus Adapters, RAID Controllers, SCSI Controllers, SAS (Serial Attached SCSI) Controllers/Switches/Expanders, SATA (Serial Advanced Technology Attachment) Controllers, Standard Product ICs and Hard Drive SoCs.

11. On information and belief, LSI's Host Bus Adapters (HBAs) include and/or have included 6Gb/s SATA+SAS HBAs such as the LSI SAS 9205-8e, LSI SAS 9212-4i4e, LSI SAS 9201-16e, LSI SAS 9201-16i, LSI SAS 9200-8e, LSI SAS 9210-8i, LSI SAS 9211-8i, LSI SAS 9211-4i and LSI SAS 9202-16e; 3Gb/s SATA+ SAS HBAs such as the LSI SAS 3081E-R, LSI SAS 3801E, LSI SAS 3442E-R, LSI SAS 3041E-R, LSI SAS 3080X-R, LSI SAS 3801X, LSI SAS 3442X-R, LSI SAS 3041X-R, and LSI SAS 31601E; SCSI HBAs such as the LSI 22320SE, LSI 20320IE, LSI 22320-R, LSI 21320-R, LSI 20320-R, Ultra320 SCSI, LSIU320, Ultra320 SCSI, LSI 20160; Fibre Channel HBAs such as the LSI 7404EP-LC, LSI 7204EP-LC, LSI

¹ The identification of products and parts herein is for example only; on information and belief, these exemplary parts are representative of all products and parts with similar functionality and/or architecture, whether discontinued, current or planned future.

7104EP-LC, LSI 7404XP-LC, LSI 7204XP-LC, LSI 7104XP-LC, LSI 7202XP-LC, LSI 7102XP-LC and LSIFC949X.

12. On information and belief, LSI's RAID Controllers include and/or have included 6Gb/s SATA+SAS Raid Controllers such as MegaRAID SAS 9280-24i4e, MegaRAID SAS 9280-16i4e, MegaRAID SAS 9280-8e, MegaRAID SAS 9280-4i4e, MegaRAID SAS 9285-8e, MegaRAID SAS 9260-16i, MegaRAID SAS 9265-8i, MegaRAID SAS 9260CV-8i, MegaRAID SAS 9261-8i, MegaRAID SAS 9260-8i, MegaRAID SAS 9260CV-4i, MegaRAID SAS 9260-4i, MegaRAID SAS 9240-8i, MegaRAID SAS 9240-4i, 3ware SAS 9750-24i4e, 3ware SAS 9750-16i4e, 3ware SAS 9750-8e, 3ware SAS 9750-8i, 3ware SAS 9750-4i4e, and 3ware SAS 9750-4i; 6Gb/s SATA+SAS Raid Controllers such as MegaRAID SAS 8880EM2, MegaRAID SAS 8888ELP, MegaRAID SAS 8708EM2, MegaRAID SAS 8704EM2, MegaRAID SAS 8204ELP, 3wareSAS9690SA-8I, 3ware 9690SA-8I, 3ware 9690SA-8E, 3ware 9690SA-4I4E, 3ware 9690SA-4I, 3ware 9650SE-24M8, 3ware 9650SE-16ML, 3ware 9650SE-12ML, 3ware 9650SE-8LPML, 3ware 9650SE-4LPML, and 3ware 9650SE-2LP.

13. On information and belief, LSI's Standard Product ICs include and/or have included SAS ICs such as LSI SAS 2308, LSI SAS 2008, LSI SAS1064, LSI SAS1064E, LSI SAS1068, LSI SAS1068E; SAS expanders ICs such as LSI SAS 2x36, LSI SAS 2x28, LSI SAS 2x24, LSI SASx36, LSI SASx28, LSI SASx12A, and LSI SASx12; and SCSI ICs such as LSI 53C1020, LSI 53C1020A, LSI 53C1030, LSI 53C1030T and LSI 53C320.

14. On information and belief, LSI's Networking Component Products include and/or have included Communication Processors, Media Processors, Multiservice Processors, Content and Security Processors, Network Processors, SONET/SDH Transport, PC/Embedded/Fax Modems, IEEE 1394 Interfaces and Gigabit Ethernet Transceivers. On information and belief,

LSI's Communication Processors include the Axxia ACP3400; LSI's Media Processors include the StarPro SP2704, SP2716 and the LSI403LP; LSI's Multiservice Processors include the Link Communication Processor (LCP), Link Communication Processor LCP5400, Link Layer Processor (LLP), Link Mapper, Ultramapper II and Hypermapper II; LSI's Content and Security Processors include the LSIT2000 and T2500; LSI's Network Processors include the APP3300, APP650 and the APP300; LSI's SONET/SDH Transport products include the TADM SONET/SDH Interface and TSOT SONET/SDH Processor; LSI's PC/Embedded/Fax Modems products include SFAX34, SFAX17, CV22, CV34, CV92, SV92A3 and SV92Ex; LSI's IEEE 1394 Interfaces include the FW643E, FW533E, FW323/322, FW802, FW803 and FW843; and LSI's Gigabit Ethernet Transceivers include the ET1011 and ET1011c.

15. Upon information and belief, these products and additional LSI products are being offered for sale and/or have been sold throughout the United States, including at Office Depot, which is located within this division and is a retailer of LSI products in this judicial division.

COUNT I - INFRINGEMENT OF U.S. PATENT NO. 5,851,899

16. Plaintiff incorporates by reference, as if fully set forth herein, the allegations contained in paragraphs 1 through 15 of this Complaint.

17. On December 22, 1998, U.S. Patent No. 5,851,899 ("the '899 patent"), entitled "Gapfill and Planarization Process for Shallow Trench Isolation," was duly and legally issued from the United States Patent and Trademark Office to the inventor, Peter Weigand ("the '899 patent inventor"). All substantive right, title, and interest in the '899 patent has been assigned to Plaintiff, including the right to sue for and recover all past, present, and future damages for infringement of the '899 patent. A copy of the '899 patent is attached as Exhibit A.

18. The '899 patent is currently in full force and effect.

19. In accordance with 35 U.S.C. § 282, the '899 patent, and each and every claim thereof, is presumed valid.

20. On information and belief, LSI's integrated circuits and products containing the same, for example, Host Bus Adapter (HBA) Storage Components, RAID Controller Storage Components, Storage Component Standard Product ICs, Media Processor Networking Products, IEEE 1394 Networking Products and Gigabit Ethernet Transceiver Networking products, for example, but not limited to, LSI 22320-R, LSI 20320-R, LSIFC949X, MegaRAID SAS 8204ELP, LSI SAS1064, LSI SAS1068, LSI SAS1068E; LSI SASx12, LSI 53C1020, LSI 53C1020A, LSI 53C1030, LSI403LP, FW803 and ET1011 contain elements corresponding to all limitations of one or more of claims 1-23 of the '899 patent.

21. On information and belief, LSI has in the past and continues to directly infringe, literally or under the doctrine of equivalents, claims 1-23 of the '899 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of one or more claims of the '899 patent.

22. On information and belief, LSI has in the past and continues to infringe by actively inducing others to infringe claims 1-23 of the '899 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of one or more claims of the '899 patent.

23. On information and belief, LSI has in the past and continues to contributorily infringe claims 1-23 of the '899 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of one or more claims of the '899 patent.

24. On information and belief, the infringement of the '899 patent by LSI has been with notice and knowledge of the patent and has therefore been willful.

25. Plaintiff has been irreparably damaged and harmed by LSI's infringement, and this damage and harm will continue unless LSI is enjoined by this Court.

COUNT II - INFRINGEMENT OF U.S. PATENT NO. 5,821,804

26. Plaintiff incorporates by reference, as if fully set forth herein, the allegations contained in paragraphs 1 through 25 of this Complaint.

27. On October 13, 1998, U.S. Patent No. 5,821,804 ("the '804 patent"), entitled "Integrated Semiconductor Circuit," was duly and legally issued from the United States Patent and Trademark Office to the inventors, Wolfgang Nikutta and Werner Reczek ("the '804 patent inventors"). All substantive right, title, and interest in the '804 patent has been assigned to Plaintiff, including the right to sue for and recover all past, present, and future damages for infringement of the '804 patent. A copy of the '804 patent is attached as Exhibit B.

28. The '804 patent is currently in full force and effect.

29. In accordance with 35 U.S.C. § 282, the '804 patent, and each and every claim thereof, is presumed valid.

30. On information and belief, LSI's integrated circuits and products containing the same, for example, Host Bus Adapter (HBA) Storage Components, RAID Controller Storage Components, Storage Component Standard Product ICs, Media Processor Networking Products, IEEE 1394 Networking Products and Gigabit Ethernet Transceiver Networking products, for example, but not limited to, LSI 22320-R, LSI 20320-R, LSIFC949X, MegaRAID SAS 8204ELP, LSI SAS1064, LSI SAS1068, LSI SAS1068E; LSI SASx12, LSI 53C1020, LSI

53C1020A, LSI 53C1030, LSI403LP, FW803 and ET1011 contain elements corresponding to all limitations of claims 1-8 of the '804 patent.

31. On information and belief, LSI has in the past and continues to directly infringe, literally or under the doctrine of equivalents, claims 1-8 of the '804 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-8 of the '804 patent.

32. On information and belief, LSI has in the past and continues to infringe by actively inducing others to infringe claims 1-8 of the '804 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-8 of the '804 patent.

33. On information and belief, LSI has in the past and continues to contributorily infringe claims 1-8 of the '804 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-8 of the '804 patent.

34. On information and belief, the infringement of the '804 patent by LSI has been with notice and knowledge of the patent and has therefore been willful.

35. Plaintiff has been irreparably damaged and harmed by LSI's infringement, and this damage and harm will continue unless LSI is enjoined by this Court.

COUNT III - INFRINGEMENT OF U.S. PATENT NO. 6,559,547

36. Plaintiff incorporates by reference, as if fully set forth herein, the allegations contained in paragraphs 1 through 35 of this Complaint.

37. On May 6, 2003, U.S. Patent No. 6,559,547 ("the '547 patent"), entitled "Patterning of Content Areas In Multilayer Metalization Configurations of Semiconductor

Components,” was duly and legally issued from the United States Patent and Trademark Office to the inventors, Matthias Uwe Lehr, Albrecht Kieslich, Peter Thieme, and Lars Volland (“the ‘547 patent inventors”). All substantive right, title, and interest in the ‘547 patent has been assigned to Plaintiff, including the right to sue for and recover all past, present, and future damages for infringement of the ‘547 patent. A copy of the ‘547 patent is attached as Exhibit C.

38. The ‘547 patent is currently in full force and effect.

39. In accordance with 35 U.S.C. § 282, the ‘547 patent, and each and every claim thereof, is presumed valid.

40. On information and belief, LSI’s integrated circuits and products containing the same, for example, Host Bus Adapter (HBA) Storage Components, RAID Controller Storage Components, Storage Component Standard Product ICs, Media Processor Networking Products, IEEE 1394 Networking Products and Gigabit Ethernet Transceiver Networking products, for example, but not limited to, LSI 22320-R, LSI 20320-R, LSIFC949X, MegaRAID SAS 8204ELP, LSI SAS1064, LSI SAS1068, LSI SAS1068E; LSI SASx12, LSI 53C1020, LSI 53C1020A, LSI 53C1030, LSI403LP, FW803 and ET1011 contain elements corresponding to all limitations of claims 1-12 of the ‘547 patent.

41. On information and belief, LSI has in the past and continues to directly infringe, literally or under the doctrine of equivalents, claims 1-12 of the ‘547 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-12 of the ‘547 patent.

42. On information and belief, LSI has in the past and continues to infringe by actively inducing others to infringe claims 1-12 of the ‘547 patent by making, using, offering for

sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of the claims of one or more '547 patent.

43. On information and belief, LSI has in the past and continues to contributorily infringe claims 1-12 of the '547 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-12 of the '547 patent.

44. On information and belief, the infringement of the '547 patent by LSI has been with notice and knowledge of the patent and has therefore been willful.

45. Plaintiff has been irreparably damaged and harmed by LSI's infringement, and this damage and harm will continue unless LSI is enjoined by this Court.

COUNT IV - INFRINGEMENT OF U.S. PATENT NO. 5,780,929

46. Plaintiff incorporates by reference, as if fully set forth herein, the allegations contained in paragraphs 1 through 45 of this Complaint.

47. On July 14, 1998, U.S. Patent No. 5,780,929 ("the '929 patent"), entitled "Formation of Silicided Junctions in Deep Micron MOSFETS by Defect Enhanced CoSi₂ Formation," was duly and legally issued from the United States Patent and Trademark Office to the inventors, Heinrich Zeininger, Christoph Zeller, Udo Schwalke, Uwe Doehler, and Wilfried Haensch ("the '929 patent inventors"). All substantive right, title, and interest in the '929 patent has been assigned to Plaintiff, including the right to sue for and recover all past, present, and future damages for infringement of the '929 patent. A copy of the '929 patent is attached as Exhibit D.

48. The '929 patent is currently in full force and effect.

49. In accordance with 35 U.S.C. § 282, the '929 patent, and each and every claim thereof, is presumed valid.

50. On information and belief, LSI's integrated circuits and products containing the same, for example, Host Bus Adapter (HBA) Storage Components, RAID Controller Storage Components, Storage Component Standard Product ICs, Media Processor Networking Products, IEEE 1394 Networking Products and Gigabit Ethernet Transceiver Networking products, for example, but not limited to, LSI 22320-R, LSI 20320-R, LSIFC949X, MegaRAID SAS 8204ELP, LSI SAS1064, LSI SAS1068, LSI SAS1068E; LSI SASx12, LSI 53C1020, LSI 53C1020A, LSI 53C1030, LSI403LP, FW803 and ET1011 contain elements corresponding to all limitations of claims 1-20 of the '929 patent.

51. On information and belief, LSI has in the past and continues to directly infringe, literally or under the doctrine of equivalents, claims 1-20 of the '929 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-20 of the '929 patent.

52. On information and belief, LSI has in the past and continues to infringe by actively inducing others to infringe claims 1-20 of the '929 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of the claims of one or more '929 patent.

53. On information and belief, LSI has in the past and continues to contributorily infringe claims 1-20 of the '929 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-20 of the '929 patent.

54. On information and belief, the infringement of the '929 patent by LSI has been with notice and knowledge of the patent and has therefore been willful.

55. Plaintiff has been irreparably damaged and harmed by LSI's infringement, and this damage and harm will continue unless LSI is enjoined by this Court.

COUNT V - INFRINGEMENT OF U.S. PATENT NO. 5,646,434

56. Plaintiff incorporates by reference, as if fully set forth herein, the allegations contained in paragraphs 1 through 55 of this Complaint.

57. On July 8, 1997, U.S. Patent No. 5,646,434 ("the '434 patent"), entitled "Semiconductor Component with Protective Structure for Protecting Against Electrostatic discharge," was duly and legally issued from the United States Patent and Trademark Office to the inventors, Ioannis Chrysostomides, Xaver Guggenmos, Wolfgang Nikutta, Werner Reczek, Johann Rieger, and Johannes Stecker and Hartmud Terletzki ("the '434 patent inventors"). All substantive right, title, and interest in the '434 patent has been assigned to Plaintiff, including the right to sue for and recover all past, present, and future damages for infringement of the '434 patent. A copy of the '434 patent is attached as Exhibit E.

58. The '434 patent is currently in full force and effect.

59. In accordance with 35 U.S.C. § 282, the '434 patent, and each and every claim thereof, is presumed valid.

60. On information and belief, LSI's integrated circuits and products containing the same, for example, Host Bus Adapter (HBA) Storage Components, RAID Controller Storage Components, Storage Component Standard Product ICs, Media Processor Networking Products, IEEE 1394 Networking Products and Gigabit Ethernet Transceiver Networking products, for example, but not limited to, LSI 22320-R, LSI 20320-R, LSIFC949X, MegaRAID SAS

8204ELP, LSI SAS1064, LSI SAS1068, LSI SAS1068E; LSI SASx12, LSI 53C1020, LSI 53C1020A, LSI 53C1030, LSI403LP, FW803 and ET1011 contain elements corresponding to all limitations of claims 1-8 and 11 of the '434 patent.

61. On information and belief, LSI has in the past and continues to directly infringe, literally or under the doctrine of equivalents, claims 1-8 and 11 of the '434 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-8 and 11 of the '434 patent.

62. On information and belief, LSI has in the past and continues to infringe by actively inducing others to infringe claims 1-8 and 11 of the '434 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of the claims of one or more '434 patent.

63. On information and belief, LSI has in the past and continues to contributorily infringe claims 1-8 and 11 of the '434 patent by making, using, offering for sale, and/or selling integrated circuits and products containing the same in the United States that are within the scope of claims 1-8 and 11 of the '434 patent.

64. On information and belief, the infringement of the '434 patent by LSI has been with notice and knowledge of the patent and has therefore been willful.

65. Plaintiff has been irreparably damaged and harmed by LSI's infringement, and this damage and harm will continue unless LSI is enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the following relief:

A. That the Court enter a judgment in favor of Plaintiff, declaring that LSI has infringed, induced the infringement of, and/or contributorily infringed the '899, '804, '547, '929 and '434 patents as set forth in this complaint;

B. That the Court enter a judgment in favor of Plaintiff, declaring that LSI's infringement of the 670, '899, '804, '547, '929 and '434 patents has been willful and trebling damages awarded to Plaintiff, as provided by 35 U.S.C. § 284;

C. That the Court preliminarily and permanently enjoins LSI, and those in active concert with it, from infringing the '899, '804, '547, '929 and '434 patents;

D. That the Court award Plaintiff all damages adequate to compensate Plaintiff for all acts of infringement of the '899, '804, '547, '929 and '434 patents, but in no event less than a reasonable royalty, together with prejudgment and post-judgment interest and costs fixed by the Court, as provided by 35 U.S.C. § 284;

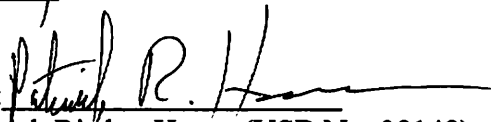
E. That the Court declare that this is an exceptional case and for an award of Plaintiff of its attorneys' fees incurred in prosecuting this action, as provided by 35 U.S.C. §285; and

F. That the Court grant Plaintiff such other and further relief as justice may require.

DEMAND FOR JURY TRIAL

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

Respectfully submitted this 10th day of January 2012.

By: 

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