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Monolithic Power Systems, Inc.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 MONOLITHIC POWER SYSTEMS, INC.,

16 Plaintiff,

17 v.

18 SILERGY CORPORATION, SILERGY
TECHNOLOGY, COMPAL
19 ELECTRONICS, INC., BIZCOM
ELECTRONICS, INC., and DR. WEI CHEN

20 Defendants.
21

Case No. 14-cv-01745-VC

**FIRST AMENDED COMPLAINT FOR
PATENT INFRINGEMENT AND BREACH
OF CONTRACT**

DEMAND FOR JURY TRIAL

22
23 Plaintiff Monolithic Power Systems, Inc. (“MPS”) hereby pleads the following claims for
24 patent infringement against Defendants Silergy Corporation and Silergy Technology (collectively
25 “Silergy”) and Defendants Compal Electronics, Inc. and Bizcom Electronics, Inc. (collectively
26 “Compal”), and breach of contract against Defendants Silergy Corporation and Dr. Wei Chen
27 (“Dr. Chen”), and alleges as follows:
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PARTIES

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2 1. Plaintiff MPS is a California corporation with its principal place of business
3 located at 79 Great Oaks Blvd., San Jose, CA 95119. MPS is the owner of the patent rights at
4 issue in this action. MPS is also a party to the December 6, 2011 Settlement and License
5 Agreement at issue in this action.

6 2. On information and belief, Defendant Silergy Corporation is a corporation
7 organized and existing under the laws of the Cayman Islands with a mailing address at Portcullis
8 Trustnet (Cayman) Ltd., The Grand Pavilion Commercial Centre, P.O. Box 32052, 802 West Bay
9 Road, Cayman Islands, British West Indies and a principal place of business at 14F., No. 663,
10 Bannan Road, Zhonghe District, Xinbei City, Taipei County, 231, Taiwan (R.O.C.). On
11 information and belief, Defendant Silergy Corporation was a registered entity with the State of
12 California (Entity No. C3181618) at least as of December 5, 2008, but has since surrendered its
13 status. Silergy Corporation is a party to the December 6, 2011 Settlement and License Agreement
14 at issue in this action.

15 3. On information and belief, Defendant Silergy Technology is a corporation
16 organized and existing under the laws of the State of California with a principal place of business
17 at 1309 S. Mary Ave., #215, Sunnyvale, CA 94087. On information and belief, Silergy
18 Technology is a subsidiary of Silergy Corporation.

19 4. On information and belief, Defendant Compal Electronics, Inc. is a corporation
20 organized and existing under the laws of Taiwan with a principal place of business at No. 581,
21 Ruiguang Rd., Neihu District, Taipei City 11492, Taiwan (R.O.C.).

22 5. On information and belief, Defendant Bizcom Electronics, Inc. is a corporation
23 organized and existing under the laws of the State of California with a principal place of business
24 at 1171 Montague Expressway, Milpitas, CA 95035. On information and belief, Bizcom
25 Electronics, Inc. is a wholly-owned subsidiary of Compal Electronics, Inc.

26 6. On information and belief, Defendant Dr. Chen is Silergy's founder, president, and
27 CEO. Prior to January, 2008, Dr. Chen was an officer of MPS and a member of the MPS Patent
28 Committee.

1 **JURISDICTION AND VENUE**

2 7. This action includes claims for patent infringement arising under the patent laws of
3 the United States, 35 U.S.C. § 1 *et seq.*, including but not limited to 35 U.S.C. § 271. This action
4 also includes a claim for breach of contract.

5 8. The Court has subject matter jurisdiction over MPS’s claims for patent
6 infringement under 28 U.S.C. §§ 1331 and 1338(a). The Court has supplemental jurisdiction over
7 MPS’s claim for breach of contract pursuant to 28 U.S.C. § 1367, as this claim forms part of the
8 same case or controversy and derives from a common nucleus of operative fact as MPS’s claims
9 of patent infringement.

10 9. This Court has personal jurisdiction over Defendants because, among other things,
11 they have committed, aided, abetted, contributed to, induced, or participated in the commission of
12 patent infringement in this judicial district and elsewhere that led to foreseeable harm and injury
13 to MPS. On information and belief, Defendants, directly or through third parties, manufacture or
14 assemble products that are and have been offered for sale, sold, purchased, and/or used within this
15 forum, including without limitation by Silergy’s direct or indirect customers, such as Compal and
16 other contract manufacturers, and by the direct or indirect customers of Compal and other
17 contract manufacturers, such as consumer electronic brands like Lenovo and Acer. Defendants,
18 directly or through their distribution networks, regularly place their products within the stream of
19 commerce with the knowledge, understanding, and desire that such products, by themselves or
20 incorporated within their direct or indirect customers’ products, including without limitation
21 notebook products from consumer electronics brands, such as Lenovo or Acer manufactured by
22 Compal or other contract manufacturers, that use Silergy components, will be shipped to, sold, or
23 used in this forum and throughout the United States. Thus, Defendants have established
24 minimum contacts within the forum and purposefully availed themselves of the benefits of this
25 forum, and the exercise of personal jurisdiction over Defendants would not offend traditional
26 notions of fair play and substantial justice. Furthermore, Defendants Silergy Corporation and Dr.
27 Chen entered into a December 6, 2011 Settlement and License Agreement with MPS by which
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1 they agreed “to submit to the jurisdiction of the state or federal courts of California for purposes
2 of any disputes relating to this Agreement.”

3 10. Defendants transact business in this forum because, among other things, they
4 manufacture, import, and distribute products that are shipped to, offered for sale, sold, purchased,
5 and used within this forum, including to or by Lenovo and Acer. Defendants also are subject to
6 personal jurisdiction in this forum. Venue therefore is proper in this judicial district pursuant to
7 28 U.S.C. §§ 1391 and/or 1400(b).

8 **INTRADISTRICT ASSIGNMENT**

9 11. This action is an intellectual property action subject to district-wide assignment.

10 **GENERAL ALLEGATIONS**

11 12. MPS is a fabless semiconductor company that designs, develops, and markets
12 proprietary, advanced analog and mixed-signal semiconductors, including synchronous step-
13 down converters utilizing under bump metallization techniques developed by MPS. The under
14 bump metallization technology developed by MPS improves the flip chip packages of MPS
15 synchronous step-down converters by increasing heat dissipation and package reliability, while
16 reducing alignment tolerances. In addition, the electrical performance of high-power integrated
17 circuits is improved by MPS’s under bump metallization technology.

18 13. MPS’s step-down converters can be used in a wide range of devices including
19 notebook computers, mobile phones, PDAs, portable instruments, DVD drives, small handheld
20 devices, and battery-powered devices. As products such as mobile phones have gotten smaller,
21 the need for step-down converters or step-down regulators of compact size yet high performance
22 has become increasingly pressing. Through its innovation and high quality design of products,
23 MPS has developed a portfolio of patents, including the patents-in-suit, to address these needs.

24 14. Silergy is a direct competitor of MPS in the power integrated circuit market.
25 Silergy’s products include synchronous step-down regulators. Silergy’s synchronous step-down
26 regulators include, e.g., the SY8208 product family among other product families. On
27 information and belief, some of Silergy’s products are designed to be pin-for-pin compatible with
28 MPS’s products.

1 15. On information and belief, Silergy's direct or indirect customers include contract
2 manufacturers, such as Compal, its subsidiary Bizcom, and others, and consumer electronics
3 companies, such as Lenovo, Acer and others. For example, Lenovo's G500 notebook product
4 contains one or more synchronous step-down regulators from Silergy. On information and belief,
5 Acer's Aspire E1 notebook product contains one or more synchronous step-down regulators from
6 Silergy. MPS has become aware that step-down regulators from Silergy are used in products,
7 such as the Lenovo G500 and Acer's Aspire E1, and incorporate the inventions of one or more
8 MPS patent.

9 16. On information and belief, contract manufacturers, such as Compal, manufacture
10 products that use Silergy's step-down regulators and incorporate the inventions of one or more
11 MPS patent, such as the Lenovo G500 and the Acer Aspire E1 notebooks. On information and
12 belief, Silergy has also sold or offered to sell its synchronous step-down regulators to other
13 contract manufacturers and consumer electronics companies.

14 17. On information and belief, Silergy and Dr. Chen had pre-suit knowledge of the
15 patents-in-suit. Dr. Chen, was, prior to January 2008, an employee of MPS. Dr. Chen had direct
16 knowledge of the engineering research and development which resulted in the patents-in-suit, and
17 he was a member of the MPS Patent Committee which authorized patent applications relating to
18 the technology of the patents-in-suit.

19 18. On information and belief, Silergy and Dr. Chen had additional pre-suit knowledge
20 of the patents in suit through negotiation of the December 6, 2011 Settlement and License
21 Agreement in *Monolithic Power Systems, Inc., v. Silergy*, No. 10-1533 (C.D. Cal. filed Mar. 2,
22 2010), during which they evaluated the patent portfolio of MPS.

23 19. Defendants also have knowledge of the patents-in-suit from the filing and service
24 of the original Complaint in this action, filed November 1, 2013.

25 20. MPS placed Silergy Corporation and Dr. Chen on notice of their infringement of
26 the patents-in-suit by at least October 31, 2013, by means of a letter sent by counsel for MPS to
27 Dr. Chen.
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1 21. MPS placed Silergy Technology and Dr. Chen on notice of their infringement of
2 the patents-in-suit by at least October 31, 2013, by means of a letter sent by counsel for MPS to
3 Dr. Chen.

4 22. MPS placed Silergy Technology on notice of its infringement of the patents-in-suit
5 by at least October 31, 2013, by means of a letter sent by counsel for MPS to Silergy
6 Technology's General Manager, Xin Shao.

7 23. MPS placed Compal Electronics, Inc. on notice of its infringement of the patents-
8 in-suit by at least October 31, 2013, by means of letter sent by MPS to Compal Electronic, Inc.'s
9 Chairman, Hsu Sheng-Hsiun.

10 24. MPS placed Bizcom Electronics Inc. on notice of its infringement of the patents-
11 in-suit by at least October 31, 2013, by means of letter sent by MPS to Bizcom Electronics, Inc.'s
12 President, Duan Wang.

13 **THE ASSERTED PATENTS**

14 25. MPS owns by assignment all rights to United States Patent No. 7,944,048 ("the
15 '048 patent"), titled "Chip Scale Package for Power Devices and Method for Making the Same,"
16 which duly and legally issued on May 17, 2011. A copy of the '048 patent is attached as
17 Exhibit A.

18 26. MPS owns by assignment all rights to United States Patent No. 8,283,758 ("the
19 '758 patent"), titled "Microelectronic Packages with Enhanced Heat Dissipation and Methods of
20 Manufacturing," which duly and legally issued on October 9, 2012. A copy of the '758 patent is
21 attached as Exhibit B.

22 27. MPS owns by assignment all rights to United States Patent No. 8,361,899 ("the
23 '899 patent"), titled "Microelectronic Flip Chip Packages with Solder Wetting Pads and
24 Associated Methods of Manufacturing," which duly and legally issued on January 29, 2013. A
25 copy of the '899 patent is attached as Exhibit C.
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1 **CLAIMS FOR RELIEF**

2 **CLAIM 1 – INFRINGEMENT OF U.S. PATENT NO. 7,944,048 BY DEFENDANTS**

3 **SILERGY AND COMPAL**

4 28. MPS incorporates by reference the allegations in the paragraphs above.

5 29. On information and belief, Defendants Silergy and Compal have infringed and
6 continue to infringe one or more claims of the '048 patent under 35 U.S.C. § 271.

7 30. Defendants Silergy have directly infringed the '048 patent in the United States and
8 this District through the making, using, sale, offer for sell, and/or importation of their products,
9 including without limitation synchronous step-down regulators including, but not limited to, the
10 Silergy SY8206, SY8208, and SY8228 product families. On information and belief, the accused
11 Silergy step-down regulators have chip-scale packages meeting the requirements of one or more
12 claims of the '048 patent, whether literally or under the doctrine of equivalents.

13 31. Defendants Compal have directly infringed the '048 patent in the United States
14 and this District through the making, using, sale, offer for sell, and/or importation of their
15 products, including without limitation products incorporating synchronous step-down regulators,
16 such as the Silergy SY8206 and SY8208 product families, including but not limited to products
17 such as the Lenovo G500 notebook manufactured by Compal for Lenovo. On information and
18 belief, the Compal products incorporating Silergy step-down regulators have chip-scale packages
19 meeting the requirements of one or more claims of the '048 patent, whether literally or under the
20 doctrine of equivalents.

21 32. Defendants Silergy have induced infringement by inducing others, including
22 without limitation Compal and other computing equipment manufacturers, Lenovo and other
23 computer electronic brands, distributors, retailers, and end users, to make, use, sell, offer for sale,
24 and/or import the accused devices in the United States and this District, including without
25 limitation the Lenovo G500 notebook. On information and belief, Defendants Silergy also have
26 provided marketing materials, technical specifications, or other materials that instruct and
27 encourage the purchasers of an accused device to use the device in a manner that infringes certain
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1 claims of the '048 patent. Defendants Silergy also have continued to sell the accused products
2 despite their awareness of MPS's infringement allegations.

3 33. Defendants Compal have induced infringement by inducing others, including
4 without limitation Lenovo and other computer electronic brands, distributors, retailers, and end
5 users, to make, use, sell, offer for sale, and/or import the accused devices in the United States and
6 this District, including without limitation the Lenovo G500 notebook. On information and belief,
7 Defendants Compal also have provided marketing materials, technical specifications, or other
8 materials that instruct and encourage the purchasers of an accused device to use the device in a
9 manner that infringes certain claims of the '048 patent. Defendants Compal also have continued
10 to sell the accused products despite their awareness of MPS's infringement allegations.

11 34. Defendants Silergy have contributed to the infringement of others, including
12 without limitation Compal and other computing equipment manufacturers, Lenovo and other
13 computer electronic brands, distributors, retailers and end users, by offering to sell, selling, and/or
14 importing within this District and the United States synchronous step-down regulators, knowing
15 the same to be especially made or especially adapted for use in the infringement of the '048
16 patent and not a staple article of commerce suitable for substantial non-infringing use.

17 35. Defendants Compal have contributed to the infringement of others, including
18 without limitation Lenovo and other computing equipment manufacturers, distributors, retailers
19 and end users, by offering to sell, selling, and/or importing within this District and the United
20 States synchronous step-down regulators, knowing the same to be especially made or especially
21 adapted for use in the infringement of the '048 patent and not a staple article of commerce
22 suitable for substantial non-infringing use.

23 36. On information and belief, Defendants' infringement has been, and continues to
24 be, willful and deliberate, and has caused substantial damage to MPS. For example, Defendants
25 have continued to sell the accused devices despite their awareness of the '048 patent and MPS's
26 infringement allegations.

27 37. On information and belief, Defendants' infringement in violation of federal patent
28 laws will continue to injure MPS unless otherwise enjoined by this Court.

1 **CLAIM 2 – INFRINGEMENT OF U.S. PATENT NO. 8,283,758 BY DEFENDANTS**

2 **SILERGY AND COMPAL**

3 38. MPS incorporates by reference the allegations in the paragraphs above.

4 39. On information and belief, Defendants Silergy and Compal have infringed and
5 continue to infringe one or more claims of the ‘758 patent under 35 U.S.C. § 271.

6 40. Defendants Silergy have directly infringed the ‘758 patent in the United States and
7 this District through the making, using, sale, offer for sell, and/or importation of their products,
8 including without limitation synchronous step-down regulators including, but not limited to, the
9 Silergy SY8206, SY8208, and SY8228 product families. On information and belief, the accused
10 Silergy step-down regulators have microelectronic packages meeting the requirements of one or
11 more claims of the ‘758 patent, whether literally or under the doctrine of equivalents.

12 41. Defendants Compal have directly infringed the ‘758 patent in the United States
13 and this District through the making, using, sale, offer for sell, and/or importation of their
14 products, including without limitation products incorporating synchronous step-down regulators,
15 such as the Silergy SY8206 and SY8208 product families, including but not limited to products
16 such as the Lenovo G500 notebook manufactured by Compal for Lenovo. On information and
17 belief, the Compal products incorporating Silergy step-down regulators have microelectronic
18 packages meeting the requirements of one or more claims of the ‘758 patent, whether literally or
19 under the doctrine of equivalents.

20 42. Defendants Silergy have induced infringement by inducing others, including
21 without limitation Compal and other computing equipment manufacturers, Lenovo and other
22 computer electronic brands, distributors, retailers, and end users, to make, use, sell, offer for sale,
23 and/or import the accused devices in the United States and this District, including without
24 limitation the Lenovo G500 notebook. On information and belief, Defendants Silergy also have
25 provided marketing materials, technical specifications, or other materials that instruct and
26 encourage the purchasers of an accused device to use the device in a manner that infringes certain
27 claims of the ‘758 patent. Defendants Silergy also have continued to sell the accused products
28 despite their awareness of MPS’s infringement allegations.

1 43. Defendants Compal have induced infringement by inducing others, including
2 without limitation Lenovo and other computer electronic brands, distributors, retailers, and end
3 users, to make, use, sell, offer for sale, and/or import the accused devices in the United States and
4 this District, including without limitation the Lenovo G500 notebook. On information and belief,
5 Defendants Compal also have provided marketing materials, technical specifications, or other
6 materials that instruct and encourage the purchasers of an accused device to use the device in a
7 manner that infringes certain claims of the '758 patent. Defendants Compal also have continued
8 to sell the accused products despite their awareness of MPS's infringement allegations.

9 44. Defendants Silergy have contributed to the infringement of others, including
10 without limitation Compal and other computing equipment manufacturers, Lenovo and other
11 computer electronic brands, distributors, retailers and end users, by offering to sell, selling, and/or
12 importing within this District and the United States synchronous step-down regulators, knowing
13 the same to be especially made or especially adapted for use in the infringement of the '758
14 patent and not a staple article of commerce suitable for substantial non-infringing use.

15 45. Defendants Compal have contributed to the infringement of others, including
16 without limitation Lenovo and other computing equipment manufacturers, distributors, retailers
17 and end users, by offering to sell, selling, and/or importing within this District and the United
18 States synchronous step-down regulators, knowing the same to be especially made or especially
19 adapted for use in the infringement of the '758 patent and not a staple article of commerce
20 suitable for substantial non-infringing use.

21 46. On information and belief, Defendants' infringement has been, and continues to
22 be, willful and deliberate, and has caused substantial damage to MPS. For example, Defendants
23 have continued to sell the accused devices despite their awareness of the '758 patent and MPS's
24 infringement allegations.

25 47. On information and belief, Defendants' infringement in violation of federal patent
26 laws will continue to injure MPS unless otherwise enjoined by this Court.
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1 **CLAIM 3 – INFRINGEMENT OF U.S. PATENT NO. 8,361,899 BY DEFENDANTS**

2 **SILERGY AND COMPAL**

3 48. MPS incorporates by reference the allegations in the paragraphs above.

4 49. On information and belief, Defendants Silergy and Compal have infringed and
5 continue to infringe one or more claims of the ‘899 patent under 35 U.S.C. § 271.

6 50. Defendants Silergy have directly infringed the ‘899 patent in the United States and
7 this District through the making, using, sale, offer for sell, and/or importation of their products,
8 including without limitation synchronous step-down regulators including, but not limited to, the
9 Silergy SY8206, SY8208, and SY8228 product families. On information and belief, the accused
10 Silergy step-down regulators have semiconductor assemblies meeting the requirements of one or
11 more claims of the ‘899 patent, whether literally or under the doctrine of equivalents.

12 51. Defendants Compal have directly infringed the ‘899 patent in the United States
13 and this District through the making, using, sale, offer for sell, and/or importation of their
14 products incorporating synchronous step-down regulators, such as the Silergy SY8206 and
15 SY8208 product families, including but not limited to products such as the Lenovo G500
16 notebook manufactured by Compal for Lenovo. On information and belief, the Compal products
17 incorporating Silergy step-down regulators have semiconductor assemblies meeting the
18 requirements of one or more claims of the ‘899 patent, whether literally or under the doctrine of
19 equivalents.

20 52. Defendants Silergy have induced infringement by inducing others, including
21 without limitation Compal and other computing equipment manufacturers, Lenovo and other
22 computer electronic brands, distributors, retailers, and end users, to make, use, sell, offer for sale,
23 and/or import the accused devices in the United States and this District, including without
24 limitation the Lenovo G500 notebook. On information and belief, Defendants Silergy also have
25 provided marketing materials, technical specifications, or other materials that instruct and
26 encourage the purchasers of an accused device to use the device in a manner that infringes certain
27 claims of the ‘899 patent. Defendants Silergy also have continued to sell the accused products
28 despite their awareness of MPS’s infringement allegations.

1 53. Defendants Compal have induced infringement by inducing others, including
2 without limitation Lenovo and other computer electronic brands, distributors, retailers, and end
3 users, to make, use, sell, offer for sale, and/or import the accused devices in the United States and
4 this District, including without limitation the Lenovo G500 notebook. On information and belief,
5 Defendants Compal also have provided marketing materials, technical specifications, or other
6 materials that instruct and encourage the purchasers of an accused device to use the device in a
7 manner that infringes certain claims of the '899 patent. Defendants Compal also have continued
8 to sell the accused products despite their awareness of MPS's infringement allegations.

9 54. Defendants Silergy have contributed to the infringement of others, including
10 without limitation Compal and other computing equipment manufacturers, Lenovo and other
11 computer electronic brands, distributors, retailers and end users, by offering to sell, selling, and/or
12 importing within this District and the United States synchronous step-down regulators, knowing
13 the same to be especially made or especially adapted for use in the infringement of the '899
14 patent and not a staple article of commerce suitable for substantial non-infringing use.

15 55. Defendants Compal have contributed to the infringement of others, including
16 without limitation Lenovo and other computing equipment manufacturers, distributors, retailers
17 and end users, by offering to sell, selling, and/or importing within this District and the United
18 States synchronous step-down regulators, knowing the same to be especially made or especially
19 adapted for use in the infringement of the '899 patent and not a staple article of commerce
20 suitable for substantial non-infringing use.

21 56. On information and belief, Defendants' infringement has been, and continues to
22 be, willful and deliberate, and has caused substantial damage to MPS. For example, Defendants
23 have continued to sell the accused devices despite their awareness of the '899 patent and MPS's
24 infringement allegations.

25 57. On information and belief, Defendants' infringement in violation of federal patent
26 laws will continue to injure MPS unless otherwise enjoined by this Court.

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1 use . . . any document that contains MPS confidential information” prospectively, Silergy’s
2 agreement not to copy MPS’s productions, and Silergy’s payment of two million dollars to MPS
3 (emphasis added).

4 63. Specifically, the December 6, 2011 Settlement and License Agreement includes
5 the following provision as ¶ G.1:

6 Non-Disclosure. Dr. Chen represents and warrants not to use or disclose any document
7 that contains MPS confidential information, including all documents that Dr. Chen
8 received or sent while he was employed by MPS; further, Dr. Chen agrees to delete his
9 wchenmps@yahoo.com email account including all emails contained therein and to
remove all MPS related emails from his wchenca@yahoo.com email account, and Dr.
Chen will provide an independent verification thereof.

10 64. On information and belief, Defendants Silergy Corporation and Dr. Chen have
11 breached this non-use provision by using information obtained from MPS’s confidential product
12 specification and description documents for MPS flip chip package products, including without
13 limitation the MP8600 product family.

14 65. On information and belief, Defendants Silergy Corporation and Dr. Chen used
15 confidential documents about MPS flip chip package products, including without limitation the
16 MP8600 product family, and incorporated information obtained from those documents into
17 Silergy’s flip chip package products, including without limitation the SY8206, SY8208, and
18 SY8228 product families.

19 66. MPS has spent significant time, effort, and money to develop, acquire, maintain,
20 and protect its confidential information. MPS is harmed—and a competitor derives value—when
21 a competitor uses MPS’s confidential information in breach of an express agreement not to do so.

22 67. At all relevant times and to prevent others from using its confidential information,
23 MPS took reasonable and necessary precautions to guard the secrecy and safety of its confidential
24 information. MPS protects its facilities, servers, computers, networks, databases, and
25 communications systems using a variety of physical and electronic security systems, such as
26 access cards, password protection systems, firewalls, and encrypted communications technology.
27 MPS also requires its employees, like Dr. Chen prior to 2008, to read, acknowledge, and sign an
28 Employee Confidential Information and Invention Assignment Agreement.

1 H. That the Court temporarily, preliminarily, and permanently enjoin Defendants
2 Silergy Corporation and Dr. Chen from further breach of the December 6, 2011 Settlement and
3 License Agreement;

4 I. That the Court render judgment declaring this to be an exceptional case and
5 awarding treble damages to MPS for the unlawful practices of Defendants;

6 J. That MPS be awarded its costs, expenses, and reasonable attorneys' fees;

7 K. That the Court order a full accounting of the damages above, including for past
8 infringement and any continuing or future infringement;

9 L. Such other and further relief as the Court deems just and proper.

10 **DEMAND FOR JURY TRIAL**

11 MPS hereby demands a trial by jury of all issues so triable.

12 DATED: July 7, 2014

PERKINS COIE LLP

13 By: /s/Thomas N. Millikan

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21 Attorneys for Plaintiff

22 Monolithic Power Systems, Inc.

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