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

SONRAI MEMORY LTD. Plaintiff, v. APPLE INC., Defendant.	Case No. 6:22-cv-00787 **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT
AGAINST APPLE INC.

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 Ltd. ("Plaintiff" or "Sonrai") makes the following allegations against Defendant Apple Inc. ("Defendant" or "Apple"):

INTRODUCTION

1. This complaint arises from Apple's unlawful infringement of the following United States patents owned by Plaintiff: United States Patent Nos. 6,874,014 (the "'014 Patent") and 6,724,241 (the "'241 Patent") (collectively the "Asserted Patents").

PARTIES

2. Plaintiff Sonrai Memory Limited is an Irish company, having its principal place of business at Suite 23, The Hyde Building, Carrickmines, Dublin 18, Ireland. Sonrai is the sole owner by assignment of all right, title, and interest in the Asserted Patents.

3. On information and belief, Defendant Apple Inc. is a publicly traded corporation organized under the laws of the State of California, with its principal place of business at One

Apple Park Way, Cupertino, CA 95014. Apple may be served with process through its registered agent, CT Corporation System, at 330 North Brand Boulevard, Suite 700, Glendale, California 91203.

JURISDICTION AND VENUE

4. 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).

5. This Court has personal jurisdiction over Apple in this action because Apple 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 Apple would not offend traditional notions of fair play and substantial justice. Apple, directly and through subsidiaries or intermediaries, has 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.

6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Apple is registered to do business in Texas, and upon information and belief, Apple has transacted business in this District and has committed acts of direct and indirect infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patents. Apple has regular and established places of business in this District, including at 12545 Riata Vista Cir., Austin, Texas 78727; 12801 Delcour Dr., Austin, Texas 78727; and 3121 Palm Way, Austin, Texas 78758.[1]

[1] *See, e.g.*, https://www.apple.com/newsroom/2019/11/apple-expands-in-austin/; https://www.google.com/maps/place/Apple+Inc./@30.4324406,-

COUNT I

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

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

8. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, 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 1.

9. On information and belief, Apple makes, uses, offers for sale, sells, and/or imports certain products and services, including without limitation iPhone products (6, 6 Plus, SE, 6s, 6s Plus, 7, 7 Plus, 8, 8 Plus, X, XR, XS, XS Max, 11, 11 Pro, 11 Pro Max, SE (second generation), 12, 12 mini, 12 Pro, 12 Pro Max, 13, 13 mini, 13 Pro, 13 Pro Max, SE (third generation)), iPad products (iPad fifth generation and newer, iPad Mini fourth generation and newer, iPad Air second generation and newer, iPad Pro all generations), MacBook products (MacBook Air (Retina, 13-inch, 2020), MacBook Air (Retina, 13-inch, 2019), MacBook Air (Retina, 13-inch, 2018), MacBook Pro (13-inch, 2020, Two Thunderbolt 3 ports), MacBook Pro (13-inch, 2020, Four Thunderbolt 3 ports), MacBook Pro (16-inch, 2019), MacBook Pro (13-inch, 2019, Two Thunderbolt 3 ports), MacBook Pro (15-inch, 2019), MacBook Pro (13-inch, 2019, Four Thunderbolt 3 ports), MacBook Pro (15-inch, 2018), MacBook Pro (13-inch, 2018, Four Thunderbolt 3 ports), MacBook Air (M1, 2020), MacBook Pro (13-inch, M1, 2020), M1 Pro

97.7359733,15z/data=!4m5!3m4!1s0x0:0x5852421ec4ac410c!8m2!3d30.4322558!4d-97.7359386; https://www.apple.com/retail/domainnorthside/.

MacBook Pro (14-inch and 16-inch, 2021), M1 Max MacBook Pro (14-inch and 16-inch, 2021)), and Mac products (Mac Mini (M1, 2020), Mac Studio (2022), M1 Ultra Mac Studio (2022), iMac (Retina 5K, 27-inch, 2020), iMac Pro, iMac (24-inch, M1, 2021), Mac Pro (2019), Mac Pro (Rack, 2019), Mac mini (2018)) (collectively, "Accused Products"), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the '014 Patent. Identification of the Accused Products will be provided in Plaintiff's infringement contentions disclosed pursuant to the Court's scheduling order.

10. The Accused Products satisfy all claim limitations of one or more claims of the '014 Patent, including via functionality within the Apple A-series, M-series, or T-series series chipset. Claim charts comparing exemplary independent claim 1 of the '014 Patent to representative Accused Products are attached as Exhibits 2 and 3.

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

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

COUNT II

INFRINGEMENT OF U.S. PATENT NO. 6,724,241

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

14. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 6,724,241, entitled "Variable charge pump circuit with dynamic load." The '241 Patent was duly and legally issued by the United States Patent and Trademark Office on April 20, 2004. A true and correct copy of the '241 Patent is attached as Exhibit 4.

15. On information and belief, Apple makes, uses, offers for sale, sells, and/or imports certain products and services, including without limitation products containing SK Hynix NAND Flash dies (*e.g.*, A2338 MacBook Pro 13, A2341 iPhone 12 Pro, A2379 iPad Pro 12.9 5th Gen, A2595 iPhone SE 3rd Gen) (collectively, "Accused Products"), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the '241 Patent. Identification of the Accused Products will be provided in Plaintiff's infringement contentions disclosed pursuant to the Court's scheduling order.

16. The Accused Products satisfy all claim limitations of one or more claims of the '241 Patent, including via functionality within the SK Hynix NAND Flash die. A claim chart comparing exemplary independent claim 1 of the '241 Patent to representative Accused Products is attached as Exhibit 5.

17. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Apple has injured Plaintiff and is liable for infringement of the '241 Patent pursuant to 35 U.S.C. § 271.

18. As a result of Apple's infringement of the '241 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Apple's infringement, but in no event less than a reasonable royalty for the use made of the invention by Apple, 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 Apple has infringed, either literally and/or under the doctrine of equivalents, the ’014 Patent and the ’241 Patent;

b. A judgment and order requiring Apple to pay Plaintiff its damages, costs, expenses, and pre-judgment and post-judgment interest for Apple’s infringement of the ’014 Patent and the ’241 Patent;

c. A judgment and order requiring Apple to pay Plaintiff compulsory ongoing licensing fees, as determined by the Court;

d. A judgment and order requiring Apple to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest and compensation for infringing products released after the filing of this case that are not colorably different from the Accused Products;

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 Apple; and

g. 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: July 15, 2022

Respectfully submitted,
/s/ Reza Mirzaie

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