IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

SEMCON TECH, LLC Plaintiff, v. QUALCOMM INCORPORATED, Defendant.	Civil Action No. _____ JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

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 Semcon Tech, LLC makes the following allegations against Defendant Qualcomm Incorporated:

PARTIES

1. Plaintiff Semcon Tech, LLC ("Semcon") is a Texas limited liability company having a principal place of business at 719 W. Front Street, Suite 242, Tyler, Texas 75702.

2. On information and belief, Defendant Qualcomm Incorporated ("Qualcomm") is a Delaware corporation having a principal place of business at 5775 Morehouse Drive, San Diego, California 92121. On information and belief, Qualcomm can be served through its registered agent, The Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

JURISDICTION AND VENUE

3. 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).

4. On information and belief, Qualcomm is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long Arm Statute, due to having availed itself of the rights and benefits of Delaware by incorporating under Delaware law and to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Delaware and in this Judicial District.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). Qualcomm is incorporated in this district, and on information and belief, has transacted business in this district and has committed and/or induced acts of patent infringement in this district.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 7,156,717

6. Plaintiff Semcon realleges and incorporates by reference paragraphs 1-5 above, as if fully set forth herein.

7. Plaintiff Semcon is the owner by assignment of United States Patent No. 7,156,717 ("the '717 patent") titled "[In] Situ Finishing Aid Control." The '717 patent was duly and legally issued by the United States Patent and Trademark Office on January 2, 2007. A true and correct copy of the '717 patent is attached hereto as Exhibit A.

8. On information and belief, Qualcomm infringed and continues to infringe the '717 patent by, among other things, using, importing, offering for sale, and/or selling products in United States incorporating semiconductor components made by a process patented under the '717 patent. Such products include, by way of example and without limitation, ARM7 core-based integrated circuits fabricated by a semiconductor foundry, GlobalFoundries, in Singapore using a process covered by one or more claims of the '717 patent, including but not limited to

claim 1. By using, importing, offering for sale, and/or selling such products that are made using process(es) covered by one or more claims of the '717 patent, Qualcomm has injured Semcon and is liable to Semcon for infringement of the '717 patent pursuant to 35 U.S.C. § 271.

9. As a result of Qualcomm's past infringement of the '717 patent, Plaintiff Semcon has suffered monetary damages in an amount adequate to compensate for Qualcomm's past infringement, but in no event less than a reasonable royalty for the use made of the invention by Qualcomm, together with interest and costs as fixed by the Court. Plaintiff Semcon will continue to suffer damages in the future unless Qualcomm's infringing activities are enjoined by this Court.

10. Unless a permanent injunction is issued enjoining Qualcomm and its agents, servants, employees, representatives, affiliates, and all others acting or in active concert therewith from infringing the '717 patent, Plaintiff Semcon will be greatly and irreparably harmed.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Semcon respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Qualcomm has infringed, either literally and/or under the doctrine of equivalents, the '717 patent;

2. A permanent injunction enjoining Qualcomm and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of the '717 patent;

3. A judgment and order requiring Qualcomm to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '717 patent as provided under 35 U.S.C. § 284; and

4. 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: March 1, 2012

BAYARD, P.A.

/s/ Richard D. Kirk
Richard D. Kirk (rk0922)
Stephen B. Brauerman (sb4952)
222 Delaware Avenue, Suite 900
P.O. Box 25130
Wilmington, DE 19899
rkirk@bayardlaw.com
sbrauerman@bayardlaw.com
(302) 655-5000

Attorneys for Plaintiff Semcon Tech, LLC

OF COUNSEL:

C. Michael Moore
Robert J. Needham
SNR DENTON US LLP
2000 McKinney Ave
Suite 1900
Dallas, TX 75201
T +1 214 259 0900
F +1 214 259 0910
mike.moore@snrdenton.com
robert.needham@snrdenton.com