IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SEMCON TECH, LLC, Plaintiff, v. TEXAS INSTRUMENTS 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 Texas Instruments 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 Texas Instruments Incorporated ("TI") is a Delaware corporation with its principal place of business at 12500 TI Boulevard, Dallas, Texas 75266. On information and belief, TI can be served through its registered agent, Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801.

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, TI 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 due 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(b), 1391(c) and 1400(b). TI 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 included as Exhibit A.

8. Defendant TI makes, uses, sells, offers for sale, and/or imports into the United States integrated circuits. On information and belief, at least some of the integrated circuits made, used, sold, offered for sale, and/or imported into the United States by TI are fabricated using, in part, a process known as chemical-mechanical polishing ("CMP") with the use of an Applied Materials Reflexion CMP system.

9. On information and belief, TI has infringed and continues to infringe the '717 patent by, among other things, making, using, offering for sale, selling and/or importing into the United States integrated circuits made by a process patented under the '717 patent. Such

integrated circuits include, by way of example and without limitation, integrated circuits fabricated using, in part, CMP with the use of an Applied Materials Reflexion CMP system, using a process covered by one or more claims of the '717 patent, including but not limited to claim 1. By making, using, offering for sale, selling and/or importing into the United States integrated circuits made by a process patented under the '717 patent, TI has injured Semcon and is liable to Semcon for infringement of the '717 patent pursuant to 35 U.S.C. § 271.

10. As a result of TI's infringement of the '717 patent, Plaintiff Semcon has suffered monetary damages in an amount adequate to compensate for TI's infringement, but in no event less than a reasonable royalty for the use made of the invention by TI, together with interest and costs as fixed by the Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Semcon respectfully requests that this Court enter:

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

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

3. 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.

April 27, 2012

BAYARD, P.A.

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