

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

STC.UNM,

Plaintiff,

v.

INTEL CORPORATION

Defendant.

Civil No. \_\_\_\_\_

COMPLAINT

The plaintiff, STC.UNM (“STC”), alleges in the afore-captioned matter as follows:

PARTIES, JURISDICTION AND VENUE

**The Plaintiff**

1. STC is a nonprofit corporation formed by and owned entirely by the University of New Mexico. STC’s principle place of business is at 801 University Blvd., SE Suite 101 Albuquerque, New Mexico.
2. STC was formed in 1995 by the Regents of the University to protect and transfer the University’s faculty inventions to the commercial marketplace.
3. STC is the owner by assignment of U.S. Patent No. 6,042,998, entitled “Method and Apparatus for Extending Spatial Frequencies in Photolithography Images” (“the ‘998 patent”), which issued on March 28, 2000. Exhibit A - ‘998 patent.

**The Defendant**

4. Upon information and belief, Intel Corporation (“Intel”) is a Delaware corporation with a principal place of business at 2200 Mission College Boulevard, Santa Clara, California 95054-1549.
5. Upon information and belief, Intel has and continues to conduct business and derive substantial revenue from the manufacture and sale of semiconductor devices, and consumer products in this Judicial District.

**Jurisdiction and Venue**

6. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1338.
7. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1400.

**COUNT I – PATENT INFRINGEMENT**

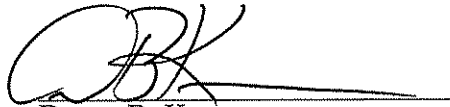
8. STC hereby incorporates by reference paragraphs 1-7, above.
9. Upon information and belief, Intel has infringed the claims of the ‘998 patent by, *inter alia*, making, using, selling, and offering for sale semiconductor devices with critical dimensions of 45nm or less.
10. STC has been, and will continue to be, irreparably harmed by Intel’s infringement in view of the finite patent monopoly that STC enjoys as the owner of the ‘998 patent.
11. Upon information and belief Intel’s acts of infringement are wilfull.
12. Intel’s infringing acts will cause continued damage to STC and its property rights.

THEREFORE, STC demands:

- A) Damages no less than a reasonable royalty pursuant to 35 U.S.C. § 284;
- B) A finding of willful infringement, and treble damages pursuant to 35 U.S.C. § 284;
- C) Attorneys fees pursuant to 35 U.S.C. § 285;
- D) Interest and costs; and
- E) Whatever additional relief the Court finds just and equitable.

Dated: November 15, 2010

Respectfully submitted,



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