

ORIGINAL

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U.S. DISTRICT COURT
DISTRICT OF WYOMING

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Stephan Hams, Clerk
Cheyenne

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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

AFTG-TG, L.L.C., a Wyoming limited
liability company, PHILLIP M. ADAMS &
ASSOCIATES, L.L.C., a Utah limited
liability company,

Plaintiffs,

vs.

NUVOTON TECHNOLOGY
CORPORATION, a Taiwan corporation,
NUVOTON TECHNOLOGY
CORPORATION AMERICA, a California
corporation, PEGATRON
CORPORATION, a Taiwan corporation,
PEGATRON TECHNOLOGY SERVICE
INC., an Indiana corporation, UNIHAN, a
Taiwan corporation,

Defendants.

**COMPLAINT FOR PATENT
INFRINGEMENT AND TRADE SECRET
THEFT**

Civil No. 10-CV-227-F

Judge: Freudenthal

Plaintiffs AFTG-TG, L.L.C. ("AFTG") and Phillip M. Adams & Associates, L.L.C. ("Adams") brings this action for the infringement of multiple U.S. Patents. This is a claim for patent infringement and arises under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of

this Complaint under 28 U.S.C. § 1338(a). Venue is proper in this District under 28 U.S.C. §§ 1391(c)-(d) and 1400(b).

PLAINTIFFS

1. Adams is a Utah limited liability company with its principle place of business now in Wyoming. Adams owns all right, title and interest in and has standing to sue for infringement of the United States patents identified below:

- 5,983,002 titled "Defective Floppy Diskette Controller Detection Apparatus and Method" ("the '002 patent");
- 6,401,222 titled "Defective Floppy Diskette Controller Detection Apparatus and Method" ("the '222 patent");
- 6,687,858 entitled "Software-Hardware Welding System" ("the '858 patent");
- 7,251,752 titled "Computerized Product Improvement Apparatus and Method" ("the '752 patent");
- 7,069,475 entitled "Software-Hardware Welding System" ("the '475 patent"); and
- 7,409,601 entitled "Read-Write Function Separation Apparatus and Method" ("the '601 patent");

(collectively "Adams patents-in-suit").

2. AFTG is a Wyoming limited liability company with its principal place of business in Wyoming. AFTG owns all right, title and interest in and has standing to sue for infringement of the United States patents identified below:

- 6,691,181 titled "Programmatic Time-Gap Defect Detection Apparatus and Method" ("the '181 patent");