

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**CONCINNITAS, LLC, AND
GEORGE W. HINDMAN,**

Plaintiffs,

v.

MOTOROLA MOBILITY LLC,

Defendant.

Civil Action No. 2:16-cv-901

JURY TRIAL DEMANDED

PLAINTIFFS' ORIGINAL COMPLAINT

This is an action for patent infringement in which Concinnitas, LLC (“Concinnitas”) and George W. Hindman (collectively, “Plaintiffs”) make the following allegations against Motorola Mobility LLC (“Motorola” or “Defendant”):

PARTIES

1. Concinnitas is a limited liability company formed under the laws of the State of Texas with a principle place of business located at 104 East Houston Street, Ste. 170A, Marshall, TX 75670 USA.
2. George W. Hindman is an individual residing in the State of Texas.
3. Motorola is a limited liability company organized and existing under the laws of the State of Delaware with a principal place of business located at 222 W. Merchandise Mart Plz., Chicago, IL 60654. Defendant can be served via its registered agent for service of process: C T Corporation System, 208 So LaSalle St., Suite 814, Chicago, IL 60604.

JURISDICTION AND VENUE

4. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284 - 85, among others. This Court has subject matter jurisdiction over this action under 28 U.S.C. §1331 and §1338(a).

5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, Defendant has transacted business in this district, and has committed and/or induced acts of patent infringement in this district.

6. Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least Defendant's 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 Texas and in this district.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 7,805,542

7. On September 28, 2010, United States Patent No. 7,805,542 (the "'542 patent") was duly and legally issued by the United States Patent and Trademark Office for an invention entitled "Mobile United Attached in a Mobile Environment That Fully Restricts Access to Data Received via Wireless Signal to a Separate Computer in the Mobile Environment." A true and correct copy of the '542 patent is attached hereto as Exhibit A.

8. George W. Hindman is the inventor of the '542 patent and the owner by assignment.

9. Concinnitas is the exclusive licensee of the '542 patent with all substantive rights in and to that patent, including the sole and exclusive right to prosecute this action and enforce the '542 patent against infringers, and to collect damages for all relevant times.

10. Defendant directly or through intermediaries, made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or systems (including at least the Moto Z Force Droid, Moto Z Droid, Moto G4 Plus, Moto G4, Moto X Pure Edition, Droid Turbo 2, and Droid Maxx 2 (the "Accused Instrumentalities")) that infringe claims 9 and 14 of the '542 patent.

11. The Accused Instrumentalities all operate in a substantially similar manner, including running Android 2.2 or above including mobile hotspot features and operating on 4G LTE networks, including a SIM card with an IMSI Number.

12. The Accused Instrumentalities infringe claim 9 of the '542 Patent. They include at least on processor (Ex. B, Fig. 1); a processor readable memory storing a set of processor executable instructions and a persistent unique hardware identification that identifies a specific hardware unit (Ex. B, Figs. 2-3); a data bus interface to transfer data authorized for use by a separate computer system to generate an output display for a mobile user (Ex. B, Fig. 4); where the unit is configured to: received information via an external wireless signal (*e.g.*, a cellular network); and communication via the data bus interface a set of data extracted from the information received from the wireless signal, wherein the persistent unit unique hardware identification is used to fully restrict access to information received at the unit via the wireless signal by determining if the unit is authorized to pass the information received at the unit via the wireless signal to the data bus interface *See* Ex. B, Figs. 2-4.

13. The Accused Instrumentalities infringe claim 14 of the '542 Patent. They include a data bus interface which uses wireless transmission. *See Ex. B, Fig. 4.*

JURY DEMAND

Plaintiffs hereby request a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

Plaintiffs request that the Court find in its favor and against Defendant, and that the Court grant Plaintiffs the following relief:

a. Judgment that claims 9 and 14 of the '542 patent have been infringed, either literally and/or under the doctrine of equivalents, by Defendant and/or by others to whose infringement Defendant has contributed and/or by others whose infringement has been induced by Defendant;

b. A permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing infringement of, or contributing to infringement of the '542 patent;

c. Judgment that Defendant accounts for and pays to Plaintiffs all damages and costs incurred by Plaintiffs, caused by Defendant's infringing activities and other conduct complained of herein;

d. That Plaintiffs be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein;

e. That this Court declare this an exceptional case and award Plaintiffs reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and

f. That Plaintiffs be granted such other and further relief as the Court may deem just and proper under the circumstances.

DATED August 15, 2016.

Respectfully submitted,

By: /s/ Hao Ni

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**ATTORNEYS FOR PLAINTIFFS
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GEORGE W. HINDMAN**

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of August, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Hao Ni

Hao Ni