

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
\_\_\_\_\_ DIVISION**

ROTHSCHILD PATENT IMAGING LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
HOBBICO, INC.	§	
	§	
Defendant.	§	
_____	§	

**COMPLAINT**

Plaintiff Rothschild Patent Imaging LLC (“Plaintiff” or “RPI”) files this original Complaint against Hobbico, Inc. (“Defendant” or “Hobbico”) for infringement of United States Patent No. 8,437,797 (“the ’797 Patent”).

**PARTIES AND JURISDICTION**

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company that has a virtual office with an address at 1400 Preston Rd., Suite 400, Plano, TX 75093.

4. On information and belief, Defendant is an Illinois corporation, with its principal place of business at 2904 Research Rd, Champaign, IL 61822.

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this

District, has conducted business in this District and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged to infringe herein were and continue to be used, imported, offered for sale and/or sold in this District.

### **VENUE**

7. Venue is proper in this District, pursuant to 28 U.S.C. § 1400(b), because Defendant is deemed to reside in this district. In addition, and in the alternative, Defendant has committed acts of infringement in this District and has a regular and established place of business in this District. For instance, Defendant has a regular and established place of business at 2904 Research Rd, Champaign, IL 61822.

### **COUNT I**

#### **(INFRINGEMENT OF UNITED STATES PATENT NO 8,437,797)**

8. Plaintiff incorporates paragraphs 1-7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

10. Plaintiff is the owner by assignment of the '797 Patent with sole rights to enforce the '797 Patent and sue infringers.

11. A copy of the '797 Patent, titled "Wireless Image Distribution System and Method," is attached hereto as Exhibit A.

12. The '797 Patent is valid, enforceable and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, Defendant has infringed and continues to infringe

one or more claims (at least by having its employees, or someone under Defendant's control, test the System), including at least claim 6, of the '797 Patent by making, using, importing, selling and/or offering for sale wireless drone cameras covered by at least Claim 6 of the '797 Patent.

14. On information and belief, Defendant sells, offers to sell and/or uses wireless security cameras, including, without limitation, Droneview cameras such as the 1080p HD Wi-Fi Droneview Camera, the Droneview app and any similar devices ("Product"), which infringe at least Claim 6 of the '797 Patent.

15. Regarding Claim 6, the Product is an image capturing mobile device (e.g., a wireless camera), which includes a wireless receiver (e.g., a Wi-Fi receiver) and a wireless transmitter (e.g., a Wi-Fi transmitter). Certain limitations of the foregoing element are illustrated in the screenshots below.

**DRONEVIEW™**

**1080p HD Wi-Fi<sup>®</sup> Camera**

The DroneView 1080p makes it easy for everyone to shoot exciting First Person View video in full high-definition. This small, lightweight FPV camera is ideal for use with R/C models. Download the free DroneView app to make it First Person View-capable, and experience your videos and photos in real time!

**Features:**

- Shoot 1080p HD video and still photos
- Download or stream content via Wi-Fi with the free [DroneView app](#)
- Use the included receiver extension for remote function

**Includes:**

- DroneView 1080p HD camera
- Extended Wi-Fi range
- Remote receiver extension

\$139.99  
Qty: 1  
ADD TO CART

**PRODUCT FLIER**

<http://www.tacticrc.com/fpv/droneview/index.html#droneviewanchor>



<http://www.tacticrc.com/fpv/droneview/index.html#droneviewanchor>

## **SPECIFICATIONS**

Resolution: 720p

Run time: Approx. 45 minutes with fully charged battery.

Weight: 1oz (27.5g)

Width: 1.34" (34mm)

Length: 3.1" (80mm)

Height: 0.9" (24mm)

**Sensor size: 1 megapixel**

<http://manuals.hobbico.com/tac/tacz1000-manual.pdf>



## DroneView Mobile App

*Instant First Person View!*

**Control your camera with the DroneView Mobile app!**

The DroneView Mobile App enables you to link your mobile device to the Tactic DroneView Wi-Fi Camera and instantly view a live feed. Record video and shoot still photos in real time. Export the video and pictures directly to your mobile device and easily share on popular social media websites. Adjust important camera features right from the app, such as brightness and contrast. For added versatility, the camera feed can also be seen and controlled by two devices simultaneously.



Compatible with iOS and Android devices.

Snapshot Button



<http://www.tacticrc.com/fpv/droneview/index.html#droneviewanchor>

## USING THE DRONEVIEW APP



Apple and the Apple logo are trademarks of Apple Inc., registered in the U.S. and other countries. App Store is a service mark of Apple Inc. Android™ and Google Play are trademarks of Google Inc. Wi-Fi® and Wi-Fi Alliance® are registered trademarks of the Wi-Fi Alliance.

The DroneView app is software for your Wi-Fi-capable Apple or Android device that allows you to connect to the DroneView camera. Your device can then use the FPV (First Person View) function to monitor what the camera is viewing and take videos or pictures from the app. These files can then be viewed and stored directly to your device.

1. Install the “DroneView” app from Google Play (Android) or the App Store (Apple).
2. Insert the memory card into the camera and turn on the camera. Wait 30 seconds for the camera to complete the initialization process.

<http://manuals.hobbico.com/tac/tacz1000-manual.pdf>

16. The Product includes a processor connected to the wireless receiver and transmitter. Every digital camera comprises a processor to carry out its essential functions. For example, the wireless camera is connected to a server which contains a processor for initiating various functionalities, such as image transfer.

17. The processor is configured to receive a plurality of photographic images. For example, the Product has an image sensor and processor that records videos, in which each frame of the video is a photographic image.

18. The processor filters the images using a transfer criterion. For example, a user may tap a snapshot icon displayed on the Droneview app in communication with the camera in order to indicate video frames for saving and transmitting. The processor filters the frames of the video to save and transmit the images according to the transfer criteria (e.g., the user's selection of frames). Certain limitations of the foregoing element are illustrated in the screenshots below.

4. Once connected, you will see the image seen by the camera (referred to in this manual as the FPV feed). Press anywhere on the screen to pull up the main menu buttons.



The Wi-Fi range will typically be around 100 meters in an open area and will be reduced when the camera is operated indoors or where there is electronic interference.

<http://manuals.hobbico.com/tac/tacz1000-manual.pdf>

## **PICTURE**

Press this button to take a still image. The screen will flash while the photo is captured. If the sound on the mobile device is turned on, the app will also make a sound like a mechanical camera shutter while the photo is taken.

---

## **VIDEO**

Press this button to start a video recording. A red stop button and timer will appear on the right side of the screen while the camera is recording. If the app loses the Wi-Fi connection to the camera, the video will continue and the on screen timer will update when the connection is restored. The other control buttons on the app cannot be accessed while the app is in video record mode. The red button on the app or the P/V button on the camera can be used to stop the video. If the receiver cable is being used, moving the camera control back to center will also stop the video.

<http://manuals.hobbico.com/tac/tacz1000-manual.pdf>

19. The processor, in conjunction with the wireless transmitter, sends the filtered images (e.g., the snapshot images selected by the user) to a second mobile device (e.g., a smartphone, tablet, etc. having the Droneview app).



20. The processor, in conjunction with the wireless receiver, receives the transfer criteria (e.g., the user's selection of snapshot images) from the second mobile device.

21. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

22. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

23. Plaintiff is in compliance with 35 U.S.C. § 287.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 8,437,797 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: November 20, 2017

Respectfully submitted,

/s/ Kenneth Matuszewski

**Kenneth Matuszewski**  
Illinois Bar. No. 6324308  
**Rabicoff Law LLC**  
73 W Monroe St  
CHICAGO, IL 60603  
708.870.5803  
[kenneth@rabilaw.com](mailto:kenneth@rabilaw.com)

**Isaac Rabicoff**  
Illinois Bar No. 6313775  
**Rabicoff Law LLC**  
73 W Monroe St  
CHICAGO, IL 60603  
773.669.4590  
[isaac@rabilaw.com](mailto:isaac@rabilaw.com)

**JAY JOHNSON**  
State Bar No. 24067322  
*(Pro Hac Vice Request Pending)*  
**D. BRADLEY KIZZIA**  
State Bar No. 11547550  
**KIZZIA JOHNSON, PLLC**  
1910 Pacific Ave., Suite 13000  
Dallas, Texas 75201  
(214) 451-0164  
Fax: (214) 451-0165  
[jay@kjpllc.com](mailto:jay@kjpllc.com)  
[bkizzia@kjpllc.com](mailto:bkizzia@kjpllc.com)

**ATTORNEYS FOR PLAINTIFF**