

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

ORTIZ & ASSOCIATES)	
CONSULTING, LLC,)	
)	Case No.
Plaintiff,)	
)	
v.)	JURY TRIAL DEMANDED
)	
PANASONIC CORPORATION)	
OF NORTH AMERICA,)	
)	
Defendant.)	
)	

COMPLAINT

Ortiz & Associates Consulting, LLC (hereinafter, “Ortiz”) brings this patent-infringement action against Panasonic Corporation of North America (hereinafter, “Panasonic”).

Parties

1. Plaintiff Ortiz is a Delaware company with its principal place of business in Albuquerque, New Mexico.
2. Panasonic is a Delaware corporation with its principal place of business in Secaucus, New Jersey.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*
4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court may exercise personal jurisdiction over Panasonic. Panasonic conducts continuous and systematic business in this District. This patent-infringement case arises directly from Panasonic's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Panasonic would be consistent with traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b).

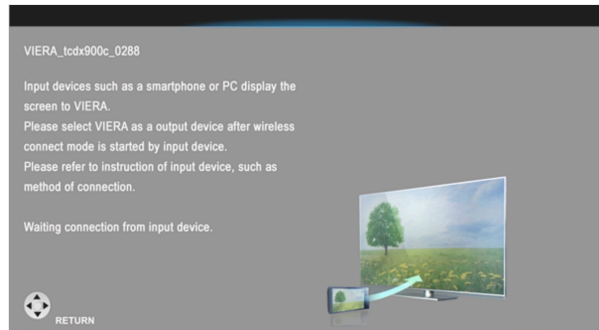
Claim of Patent Infringement

7. Ortiz is the exclusive owner of United States Patent No. 9,147,299 (the "'299 patent"), which is attached hereto as "Exhibit A."

8. The '299 patent is valid and enforceable.

9. Panasonic has been and is directly infringing claims of the '299 patent. Panasonic practices the methods embodied in the claims of the '299 patent. Without limiting the claims that may be asserted or the services that may be accused of infringement in this action, Panasonic is infringing claim 1 of the '299 patent when Panasonic televisions—for example the Viera line of televisions—perform the "mirroring feature."

a. Claim 1 is, "A method of brokering video data between handheld wireless devices and publicly and privately available data rendering devices in the form of at least one of a video monitor and multimedia projector for rendering of the video data at a selected rendering device, comprising" The Viera performs the "mirroring feature," which brokers video data between an android phone and the television itself.



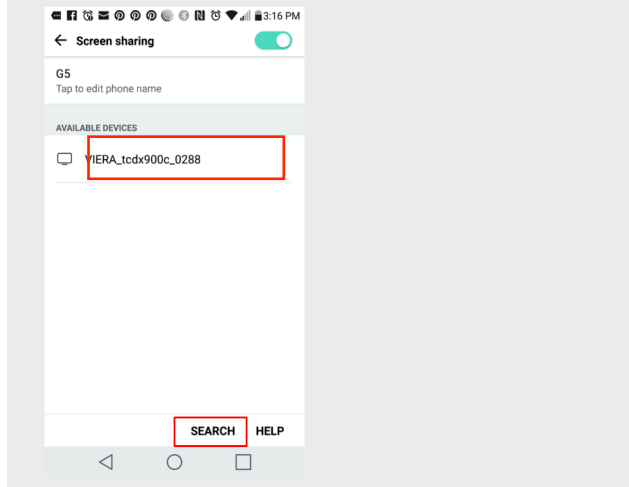
[http://eng-ca.faq.panasonic.com/app/answers/detail/a_id/43305/~how-to-use-the-mirroring-feature-on-a-panasonic-television-with-the-firefox.](http://eng-ca.faq.panasonic.com/app/answers/detail/a_id/43305/~how-to-use-the-mirroring-feature-on-a-panasonic-television-with-the-firefox)

b. Claim 1 includes “receiving a request in a wireless data communication network from a wireless device (WD) to locate at least one data rendering device (DRD) in the form of at least one of a video monitor and multimedia projector for rendering video data selected at said WD, said request including WD location information. . . .” The Viera television is a “smart tv” that has access to and uses data networks, including a smartphone:

How to use the mirroring feature on a Panasonic television with the Firefox operating system and an Android Smart device.

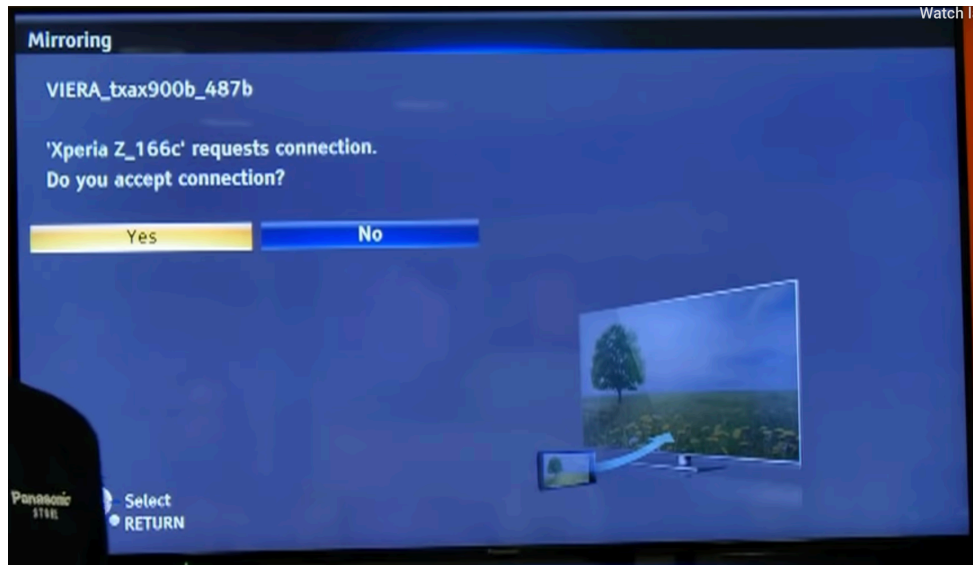
1. Connect both your TV and the Android (OS 4.2 or higher) device to the same wireless network.

10. Tap "SEARCH" to search for available devices on your network.



[http://eng-ca.faq.panasonic.com/app/answers/detail/a_id/43305/~how-to-use-the-mirroring-feature-on-a-panasonic-television-with-the-firefox.](http://eng-ca.faq.panasonic.com/app/answers/detail/a_id/43305/~/how-to-use-the-mirroring-feature-on-a-panasonic-television-with-the-firefox)

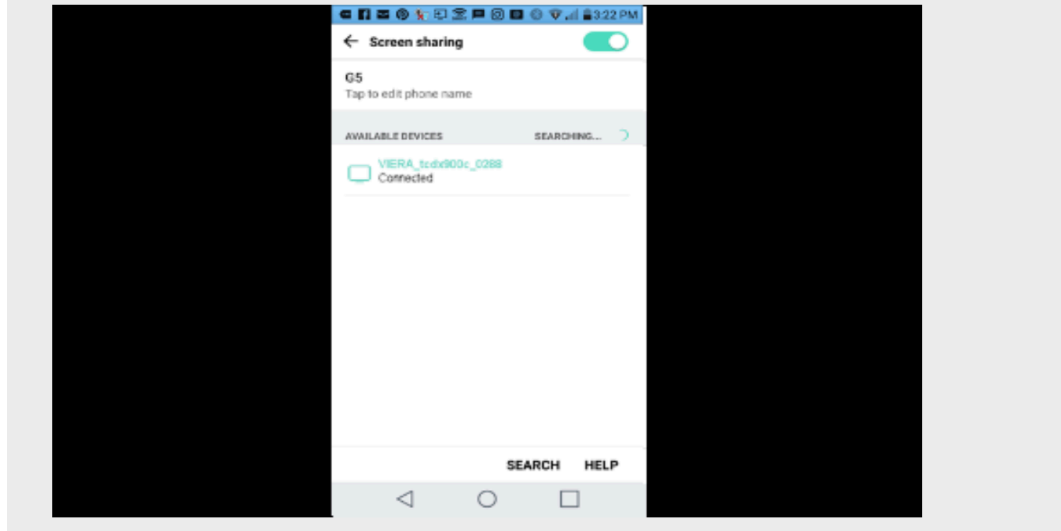
c. Claim 1 continues, “said wireless data communication network identifying a physical location, operational readiness and rendering capabilities of at least one DRD for said WD based on the WD location information; said wireless data communication network providing said WD with location information of at least one accessible DRD for selection by said WD. . . .” The Viera selects video for rendering on the Viera’s monitor after the Viera verifies authorization to connect:



<https://youtu.be/vRWjji6MisQ>.

d. Claim 1 concludes: “receiving from said WD via said wireless data communication network a selection of a DRD by entry of authorization code at a user interface on at least one of said WD and said DRD once the DRD is physically located, and video data selected from at least one of said WD or a server accessible by said WD for rendering at said DRD, wherein verification of the authorization code entered on the user interface causes said DRD to retrieve and render the video data.” The Viera provides to its monitor the video data, i.e., a mirrored display of the smartphone:

13. When connected, a mirroring display screen of the Android device will appear on the TV display.



[http://eng-ca.faq.panasonic.com/app/answers/detail/a_id/43305/~how-to-use-the-mirroring-feature-on-a-panasonic-television-with-the-firefox.](http://eng-ca.faq.panasonic.com/app/answers/detail/a_id/43305/~how-to-use-the-mirroring-feature-on-a-panasonic-television-with-the-firefox)

Prayer for Relief

WHEREFORE, Ortiz prays for the following relief against Panasonic:

- (a) Judgment that Panasonic has directly infringed the '299 patent;
- (b) For a fair and reasonable royalty;
- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) For such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

Ortiz demands a trial by jury on all matters and issues triable by jury.

Date: October 9, 2019

/s/ Stamatios Stamoulis

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