

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

MESA DIGITAL LLC,	)	
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	
	)	Judge
	)	
ZEBRA TECHNOLOGIES CORP.,	)	
	)	
	)	
Defendant.	)	

**COMPLAINT FOR PATENT INFRINGEMENT WITH LR 3.2 NOTICE OF NO  
PUBLICALLY HELD AFFILIATES**

Mesa Digital LLC (“Mesa”) brings this patent-infringement action against Zebra Technologies Corp. (“Zebra”).

**Parties**

1. Plaintiff Mesa is a limited liability company organized under the laws of New Mexico with a principal place of business located in Albuquerque, New Mexico.

**Pursuant to LR 3.2, Mesa has no publically held affiliates.**

2. Zebra is a Delaware corporation, having its principal place of business in Lincolnshire, Illinois.

**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 Zebra. Zebra conducts continuous and systematic business in this District; and this patent-infringement case arises directly from Zebra's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Zebra would be consistent with the Illinois long-arm statute and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(1)-(2) and 1400(b).

**Infringement of U.S. Patent No. 9,031,537**

7. Mesa is the exclusive owner of United States Patent No. 9,031,537 (the “537 patent”).

8. The ‘537 patent is valid and enforceable.

9. Zebra has been and is directly infringing at least Claim 1 of the ‘537 patent. Zebra has made and sold and is making and selling mobile devices, including the TC8000. Without limiting the claims that will be asserted or the products that will be accused of infringement in this action, Zebra infringes Claim 1 of the ‘537 patent by making and selling the TC8000.

a. Claim 1 is an electronic wireless hand held multimedia device. The TC8000 is also an electronic wireless hand held multimedia device.

b. Claim 1 includes “at least one of a wireless unit and a tuner unit supporting bi-directional data communications of data including video and text for the electronic wireless hand held multimedia device with remote data resources over cellular

telecommunications networks, over wireless local area networks and over a direct wireless connection with electronic devices located within short range using Bluetooth communications after accepting a passcode from a user of the electronic wireless hand held multimedia device during the communications[.]” Zebra describes the TC8000 as comprising at least one of a wireless unit and a tuner unit supporting bi-directional data communications of data including video and text for the electronic wireless hand held multimedia device with remote data resources over cellular telecommunications networks [cellular network], over wireless local area networks [Radio/IEEE 802.11 a/b/g/n/d/h/i/k/r] and over a direct wireless connection with electronic devices located within short range using Bluetooth communications after accepting a passcode from a user of the electronic wireless hand held multimedia device during the communications [Bluetooth 4.0]. With respect to each of these forms of bi-directional data communications, the communication is established after accepting a passcode from a user of the TC8000.

c. Claim 1 includes “a touch sensitive display screen configured to display the data including video and text received by the electronic wireless hand held multimedia device by selecting a particular data represented by a soft button on the touch sensitive display screen of the electronic wireless hand held multimedia device[.]” Zebra describes the TC8000 as including Claim 1’s display screen with soft-button selection: “Touch the screen to view the playback controls.”

d. Claim 1 includes “a microprocessor configured to facilitate operation of and communications by the electronic wireless hand held multimedia device.” Zebra

describes the TC8000 as including the Qualcomm 8060 Pro Dual Core 1.7 GHz microprocessor.

**Prayer for Relief**

WHEREFORE, Mesa prays for the following relief against Zebra:

- (a) Judgment that Zebra has directly infringed claims of the '537 patent;
- (b) For a reasonable royalty;
- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) For injunctive relief; and
- (e) For such other and further relief as the Court may deem just and proper.

**Demand for Jury Trial**

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

Date: December 17, 2019

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