

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ORTIZ & ASSOCIATES  
CONSULTING LLC,

Plaintiff,

v.

HISENSE CO., LTD.,

Defendant.

**JURY TRIAL DEMANDED**

**COMPLAINT AND NOTICE OF ABSENCE OF PUBLICLY HELD AFFILIATES**

Ortiz & Associates Consulting LLC (hereinafter, “Ortiz”) brings this patent-infringement action against Hisense Co., Ltd. (“Hisense”).

**Parties**

1. Plaintiff Ortiz is a company organized under the laws of New Mexico with a principal place of business located in Albuquerque, New Mexico. Pursuant to LR 3.2, Ortiz states that it has no publicly held affiliates.

2. Defendant Hisense is a corporation organized under the laws of China with a regular and established place of business in 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 Hisense. Hisense is a resident of Illinois and conducts continuous and systematic business in this District. Hisense maintains corporate offices in this District. This patent-infringement case arises directly from Hisense's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Hisense 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).

**Infringement of U.S. Patent No. 9,147,299**

7. Ortiz is the exclusive owner of United States Patent No. 9,147,299 (the "'299 patent").

8. The '299 patent is valid and enforceable.

9. Hisense infringes Claim 1 of the '299 patent by making, using, and selling the Miracast service.

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 multi media projector for rendering of the video data at a selected rendering device." As demonstrated below, Hisense describes Anyview Cast as a method of brokering video data between handheld wireless devices (for example, a telephone) and data rendering devices (a Hisense television) 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.

b. Claim 1 includes the step of "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 or rendering video data selected at said WD, said request including WD location information.” Hisense states, “The Anyview Cast is an app that enables you to share (or cast) a video, audio or image from your Android-based device to the TV.”

c. Claim 1: “[S]aid 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.” Hisense states, “Find your TV in the list of devices that displays and select.”

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.” Hisense states, “Wait for the ‘Creating Connection’ progress bar to complete on the TV screen and the video or image will display in a moment.” In order to establish the connection, the Hisense TV requests and receives a credential (e.g., an API key).

### **Prayer for Relief**

WHEREFORE, Ortiz prays for the following relief against Hisense:

(a) Judgment that Hisense has directly infringed the ‘299 patent;

- (b) A fair and reasonable royalty;
- (c) Pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) A Post-judgment injunction; and
- (e) 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 so triable.

Date: April 8, 2020

/s/ Matthew M. Wawrzyn

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