IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

INNOVATION SCIENCES, LLC, Plaintiff, v. XIAOMI CORPORATION; XIAOMI, INC., Defendants.	Case No. 1:25-cv-00394 **Jury Trial Demanded**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Innovations Sciences, LLC (hereinafter "Innovation Sciences" or "Plaintiff") files this Complaint against Defendants Xiaomi Corporation and Xiaomi, Inc. (hereinafter collectively referred to as "Xiaomi" or "Defendants") for infringement of United States Patent Nos. 10,136,179, 10,368,125, and 10,469,898. (the "Patents-in-Suit"), and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq*.

THE PARTIES

2. Plaintiff Innovation Sciences is a limited liability company organized under the laws of Texas and has a principal of business at 5800 Legacy Circle, Suite 311, Plano, Texas 75024.

3. On information and belief, Defendant Xiaomi Corporation is a corporation organized and existing under the laws of the Cayman Islands with a principal place of business at the offices of Maples Corporate Services Limited, P.O. Box 309, Ugland House, Grand Cayman, KY1-1104, Cayman Islands. On information and belief, Defendant Xiaomi Corporation may be served with process pursuant to the provisions of the Hague Convention. Xiaomi Corporation may also be served

with process by serving the Texas Secretary of State at 1019 Brazos Street, Austin, Texas 78701 as its agent for service because it engages in business in Texas but has not designated or maintained a resident agent for service of process in Texas as required by statute.

4. On information and belief, Defendant Xiaomi Inc. is a corporation organized and existing under the laws of the People's Republic of China with a principal place of business at Xiaomi Office Building, 68 Qinghe Middle Street, Haidian District, Beijing, China 100085.

5. Defendant Xiaomi Inc. is a wholly-owned subsidiary of Defendant Xiaomi Corporation. Xiaomi Inc. may be served with process pursuant to the provisions of the Hague Convention. Xiaomi Inc. may also be served with process by serving the Texas Secretary of State at 1019 Brazos Street, Austin, Texas 78701 as its agent for service because it engages in business in Texas but has not designated or maintained a resident agent for service of process in Texas as required by statute.

6. On information and belief, Xiaomi is a leading manufacturer and seller of consumer electronics devices, including smart devices in the United States, including doing business in the State of Texas and within the Western District of Texas.

7. On information and belief, Xiaomi sells and offers to sell products and services throughout the State of Texas, including in this judicial district, as well as throughout the United States, and introduces products and services that perform infringing processes into the stream of commerce knowing that they would be used, offered for sale, or sold in this judicial district and elsewhere in the United States.

8. On information and belief, Xiaomi made, used, offered to sell, offered to sell access to, sold, and/or sold access to products and services, or makes, uses, offers to sell, offers to sell access to, and/or sells access to products and services, including, but not limited to, the following specifically accused products and services: (1) Xiaomi TV Products (*e.g.*, Xiaomi TV Box S (2nd) Gen, Mi Box S, Xiaomi TV Stick 4K, Mi TV Stick (collectively and individually, "Xiaomi TV Box"), Xiaomi TV monitors (*e.g.*, Xiaomi TV Max, Xiaomi TV S Mini LED, Xiaomi TV A, Xiaomi TV A Pro, Xiaomi

TV Q1E, Xiaomi TV P1E, and Xiaomi TV F2 (collectively and individually, "Xiaomi TV")); (2) Xiaomi Home Security Products (*e.g.*, Xiaomi Smart Camera C500 Dual, Xiaomi Smart Camera C700, Xiaomi Outdoor Camera CW500, Xiaomi Outdoor Camera CW700S, Xiaomi Smart Camera C300, Xiaomi Smart Camera C301, Xiaomi Outdoor Camera BW300, Xiaomi Solar Outdoor Camera BW 400 Pro, Xiaomi Smart Camera C500 Pro, Xiaomi Outdoor Camera AW300, Xiaomi Smart Camera C200, Mi 360 Camera 1080p, Mi 360 Home Security Camera 2K, Mi Wireless Outdoor Security Camera 1080p, and Mi 360 Home Security Camera 2K Pro (collectively and individually, "Xiaomi Smart Camera")); (3) Xiaomi Air Purifiers (*e.g.*, Xiaomi Smart Air Purifier 4 Compact (collectively and individually, "Xiaomi Smart Air Purifiers")); (4) Xiaomi Robot Vacuum Cleaners (*e.g.*, Xiaomi Robot Vacuum X20 Max, Xiaomi Robot Vacuum E5, Xiaomi Robot Vacuum X10, Xiaomi Robot Vacuum X20 Pro, Xiaomi Robot Vacuum E10C, Xiaomi Robot Vacuum S10, Xiaomi Robot Vacuum T12, and Xiaomi Robot Vacuum G20 Max (collectively and individually, "Xiaomi Robot Vacuum Cleaners")); (5) Xiaomi Smart Appliances; (6) Xiaomi mobile phones and tablets; (7) Xiaomi Smart Home or IOT systems (*e.g.*, Xiaomi servers or clouds)); (8) Xiaomi Applications and/or modules (*e.g.*, Mi Home/Xiaomi Home App)) (9) Xiaomi Smart Home Devices (*e.g.*, sensors, lights)); (10) current or legacy products or services, which use, or have used one or more of the foregoing products and services as a component product or component service; (11) combinations of products and/or services comprising, in whole or in part, two or more of the foregoing products and services; and, (12) all other current or legacy products and services imported, made, used, sold, or offered for sale by Xiaomi that operate, or have operated in a substantially similar manner as the above-listed products and services. (One or more of the foregoing products and services are individually and collectively referred to as the accused "Xiaomi Products and Services"). On information and belief, the Xiaomi Products and Services infringe at least one claim of each of the Patents-in-Suit.

JURISDICTION AND VENUE

9. This civil action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq*. Accordingly, this Court has subject matter jurisdiction under at least 28 U.S.C. §§ 1331 and 1338(a).

10. This Court has general and specific personal jurisdiction over Defendants collectively (*i.e.*, Xiaomi) because Xiaomi regularly conducts and solicits business, or otherwise engages in other persistent courses of conduct in this judicial district, and/or derives substantial revenue from the use, sale, and distribution of goods and services, including but not limited to the accused Xiaomi Products and Services provided to individuals and businesses in this district.

11. Xiaomi has committed and continues to commit acts of infringement within this district and, thereby, giving rise to this action and establishing minimum contacts with this forum such that the exercise of jurisdiction over Xiaomi would not offend traditional notion of fair play and substantial justice. In addition, this Court has personal jurisdiction over Xiaomi at least for the following reasons: (1) Xiaomi has purposefully availed itself of the privileges of conducting business in the State of Texas; (2) Xiaomi has sought privileges, protections and benefit from the laws of the State of Texas; (3) Xiaomi regularly conducts business within the State of Texas and within this district, and Plaintiff's cause of action arises directly from Defendants' business contacts and other activities in the State of Texas and in this district, including deriving substantial revenue from the infringing Xiaomi Products and Services in the State of Texas and this district.

12. On information and belief, Xiaomi, on its own and/or via its subsidiaries, divisions, partners, affiliates, and parent maintain a commercial presence in the United States, including in State of Texas and in this judicial district, via at least (1) consumers residing in the Western District of Texas who purchase or utilize the Xiaomi accused Products and Services. Xiaomi actively opens, solicits, invites, advertises, and/or promotes the accused Xiaomi Products and Services to residents, citizens, and customers of the United States and this judicial district; or has opened, solicited, invited, advertised, and/or promoted the accused Xiaomi Products and Services and to residents, citizens, and

customers of the United States and this judicial district.

13. This Court has personal jurisdiction over Xiaomi, at least, because it committed acts of infringement in this judicial district in violation of 35 U.S.C. §§ 271(a). Specifically, on information and belief, Xiaomi has made, used, offered to sell access to, and/or sold access to the accused Xiaomi Products and Services in this judicial district.

14. On information and belief, Xiaomi is subject to the Court's jurisdiction pursuant to due process and/or the Texas Long Arm Statute due at least because it regularly conducts and solicits business, or otherwise engages in other persistent courses of conduct in this judicial district, and/or derives substantial revenue from the use, sale, and services, including but not limited to the accused Xiaomi Products and Services provided to individuals and businesses in this judicial district.

15. On information and belief, Xiaomi has supported, marketed, made, distributed, offered to sell, and/or sold; or, supports, markets, makes, distributes, offers to sell, and/or sells, the accused Xiaomi Products and Services to consumers throughout the United States, the State of Texas, and residents of the Western District of Texas through various means.

16. On information and belief, Xiaomi derives substantial revenue within the state from the offer of infringing products and services.

17. On information and belief, Xiaomi, on its own and/or via its subsidiaries, divisions, partners, affiliates, and parent, infringe (either directly and/or indirectly) one or more of the claims of the Patents-in-Suit.

18. Venue is proper pursuant to 28 U.S.C. §§ 1391(b), (c), (d) and/or 1400(b). Venue is proper at least because Xiaomi is not resident in the United States. 28 U.S.C. § 1391(c)(3) states that "a defendant not resident in the United States may be sued in any judicial district."

THE ASSERTED PATENTS

United States Patent No. 10,136,179

19. On November 20, 2018, the United States Patent and Trademark Office ("USPTO") duly and legally issued United States Patent No. 10,136,179 ("the '179 patent") entitled "Method and System for Efficient Communication" to inventors Tiejun Wang and Tiehong Wang.

20. The '179 patent is presumed valid under 35 U.S.C. § 282. A true and correct copy of the '179 patent is attached hereto as Exhibit 1.

21. Innovation Sciences owns all rights, title, and interest in the '179 patent.

22. Innovation Sciences has not granted Defendants an approval, an authorization, or a license to rights under the '179 patent.

23. The '179 patent relates to, among other things, systems and corresponding devices that, *inter alia,* allow multimedia communications with different user terminals, and deliver multimedia information to multiple user terminals concurrently, dynamically, and efficiently.

24. The claimed invention(s) of the '179 patent sought to solve technical problems in multimedia communications with different user terminals by delivering multimedia information to multiple user terminals concurrently, dynamically, and efficiently.

25. The claimed invention(s) of the '179 patent have numerous applications including but not limited to: efficiently directing communications on a network; directing a television display from a mobile terminal; conversion and routing of content to devices that employ differing communication protocols is provided; bidirectional conversion and routing of content to differing devices; remotely receiving and accommodating completion of multimedia content requests from a plurality of content sources; and methods for optimizing the delivery of content that is commonly requested by a plurality of users in a particular location is provided.

26. The inventions of the '179 patent can be implemented in various forms including, but not limited to: business processes, computer implemented methods, computer program products,

computer systems and networks, user interfaces, application programming interfaces as well as other similar areas.

United States Patent No. 10,368,125

27. On July 30, 2019, the USPTO duly and legally issued United States Patent No. 10,368,125 ("the '125 patent") entitled "Method and System for Efficient Communication" to inventors Tiejun Wang and Tiehong Wang.

28. The '125 patent is presumed valid under 35 U.S.C. § 282. A true and correct copy of the '125 patent is attached hereto as Exhibit 2.

29. Innovation Sciences owns all rights, title, and interest in the '125 patent.

30. Innovation Sciences has not granted Defendants an approval, an authorization, or a license to rights under the '125 patent.

31. The '125 patent contains related application data to the '179 patent. The '125 patent specification is nearly identical to the specification of the '179 patent and solves the problems described in the '179 patent.

United States Patent No. 10,469,898

32. On November 5, 2019, the United States Patent and Trademark Office ("USPTO") duly and legally issued United States Patent No. 10,469,898 ("the '898 patent") entitled "Method and System for Efficient Communication" to inventors Tiejun Wang and Tiehong Wang.

33. The '898 patent is presumed valid under 35 U.S.C. § 282. A true and correct copy of the '898 patent is attached hereto as Exhibit 3.

34. Innovation Sciences owns all rights, title, and interest in the '898 patent.

35. Innovation Sciences has not granted Defendants an approval, an authorization, or a license to rights under the '898 patent.

36. The ’898 patent contains related application data to the ’179 patent. The ’898 patent specification is nearly identical to the specification of the ’179 patent and solves the problems described in the ’179 patent.

CLAIMS FOR RELIEF

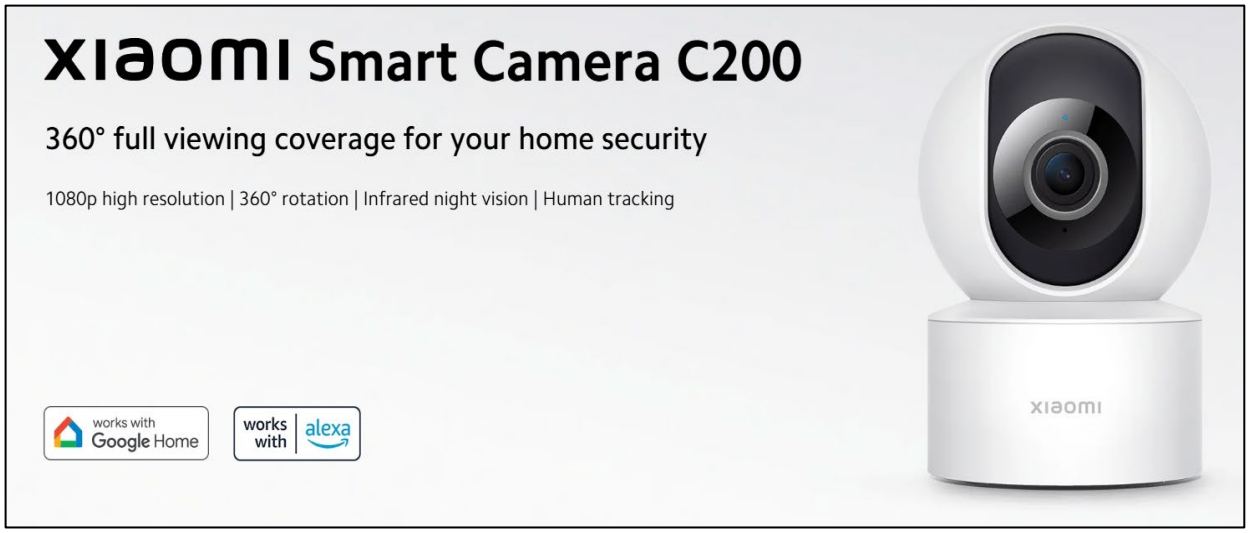
Count I – Infringement of United States Patent No. 10,136,179

37. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

38. On information and belief, Xiaomi violated 35 U.S. C. § 271(a) with respect to one or more claims of the ’179 patent.

39. On information and belief, Xiaomi (or those acting on its behalf) (i) makes, uses, sells, sells access to, imports, offers to sell and/or offers to sell access to the Xiaomi Products and Services in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 1 of ’179 patent.

40. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device (*e.g.*, Xiaomi Smart Camera C200) associated with a unique identifier (*e.g.*, Serial number, Unique Identifier (“UID”) defined by the manufacturer, name given by the user, etc.). On information and belief and as shown below, Xiaomi Products and Services such as the Xiaomi Smart Camera C200 provides a wireless device that communicates via Wi-Fi. Further, Xiaomi Smart Camera has a unique identifier (*e.g.*, Serial number, UID defined by the manufacturer, name given by the user, etc.), which is used for identification of the camera during communication.

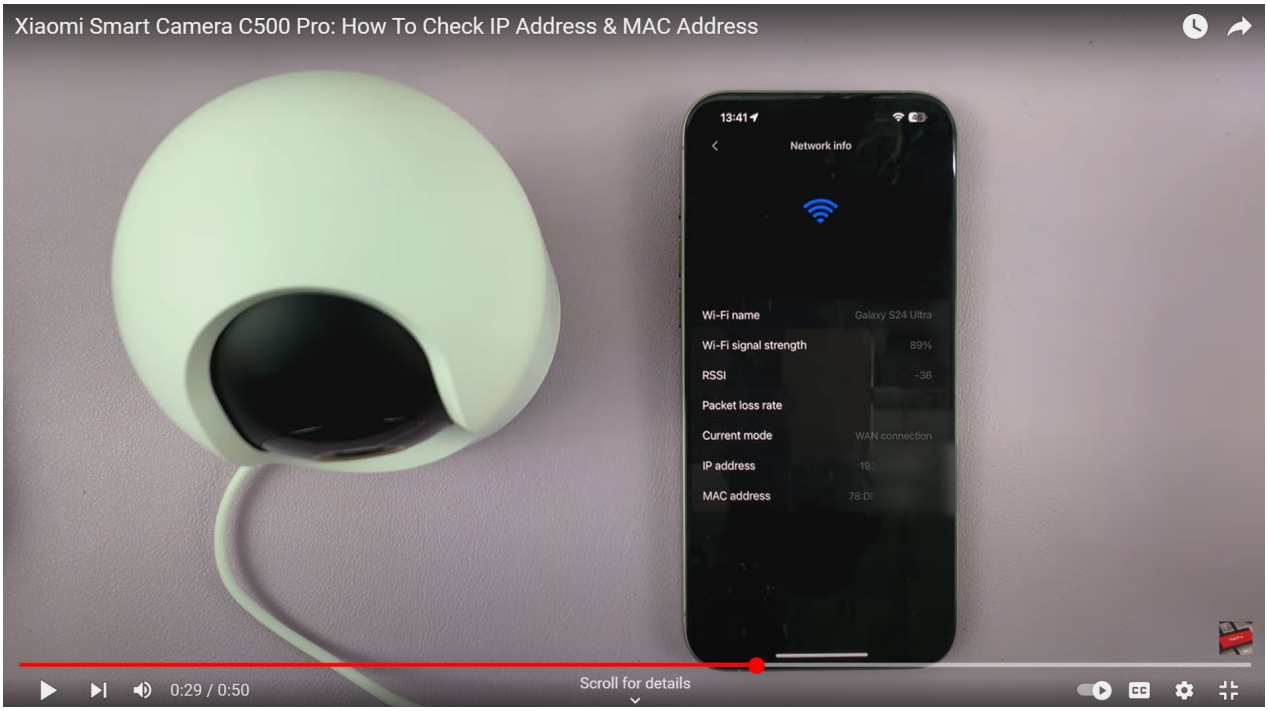


See Xiaomi Smart Camera C200.

Specifications

Name: Xiaomi Smart Camera C200
Model: MJSXJ14CM
Input: 5 V ⎓ 2 A
Aperture: F2.1
Item Dimensions: 109 × 75 × 75 mm
Operating Temperature: -10°C to 40°C
Wireless Connectivity: Wi-Fi IEEE 802.11 b/g/n 2.4 GHz
Storage: MicroSD card (up to 256 GB)
Resolution: 1080p
Net Weight: Approx. 256 g
Video Codec: H.265

See Xiaomi Smart Camera C200 User Manual.

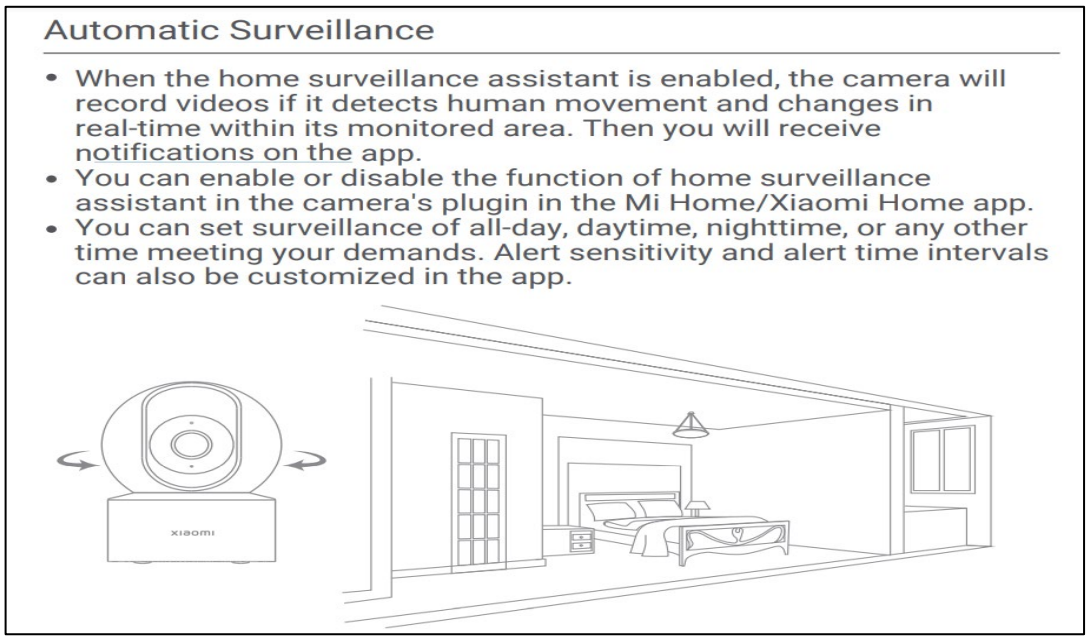


See Xiaomi Smart Camera C500 Pro: How To Check IP Address & MAC Address.

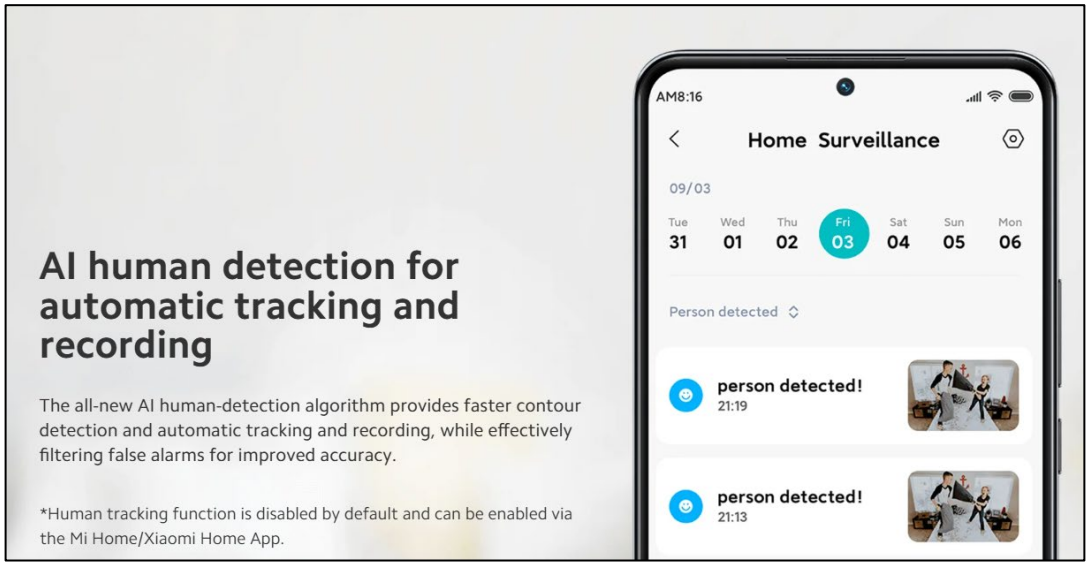
See First Setup & Connecting With App On XIAOMI Smart Camera C200 - YouTube.

41. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising a sensor configured

to detect a change of a condition (*e.g.*, movement or changes in light/sound/temperature detected in the monitoring area).



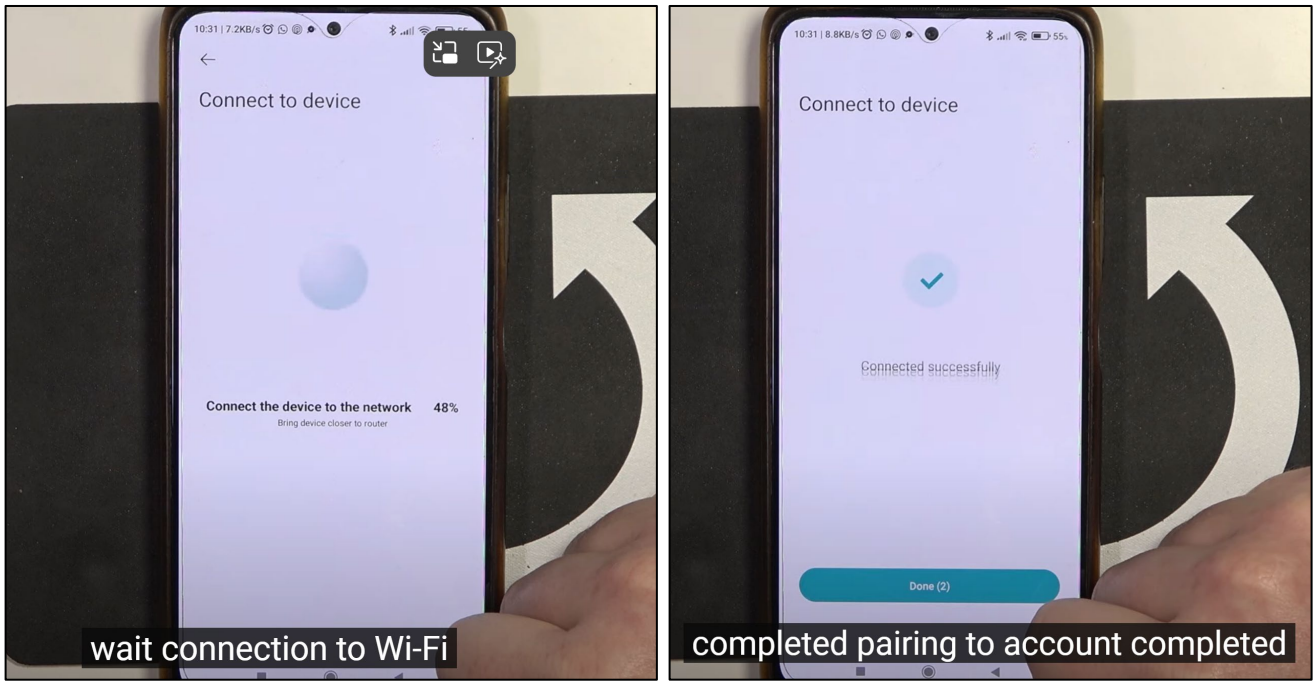
See Xiaomi Smart Camera C200 User Manual.



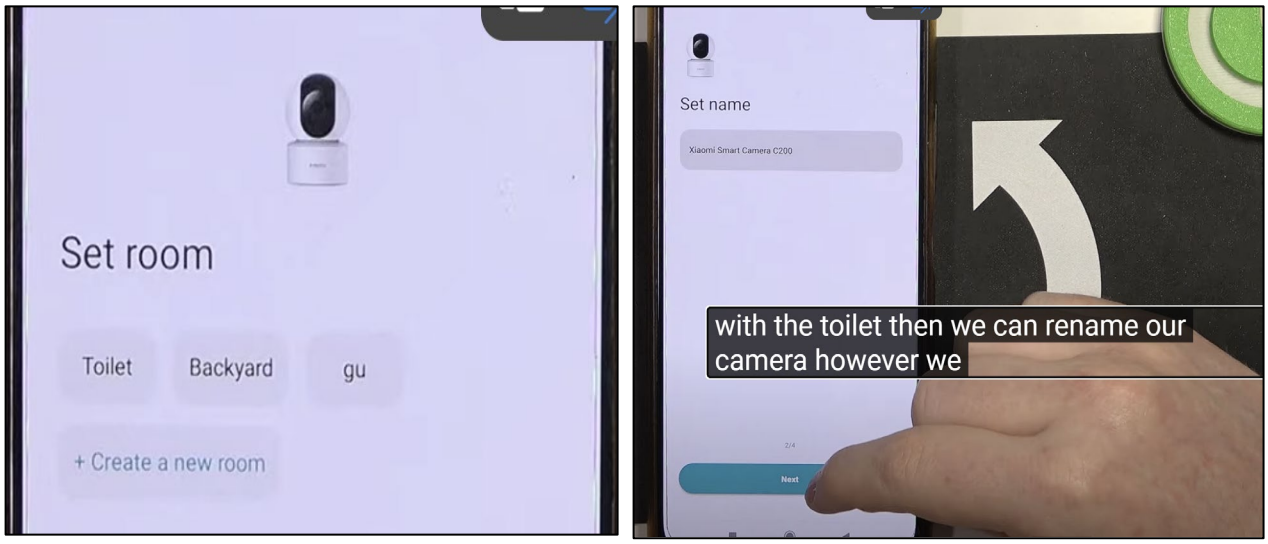
See Xiaomi Smart Camera C200.

42. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising a transmitter (*e.g.*, Wi-Fi transmitter) configured to send a wireless signal via, *e.g.*, a WiFi network (*e.g.*, Wi-Fi IEEE

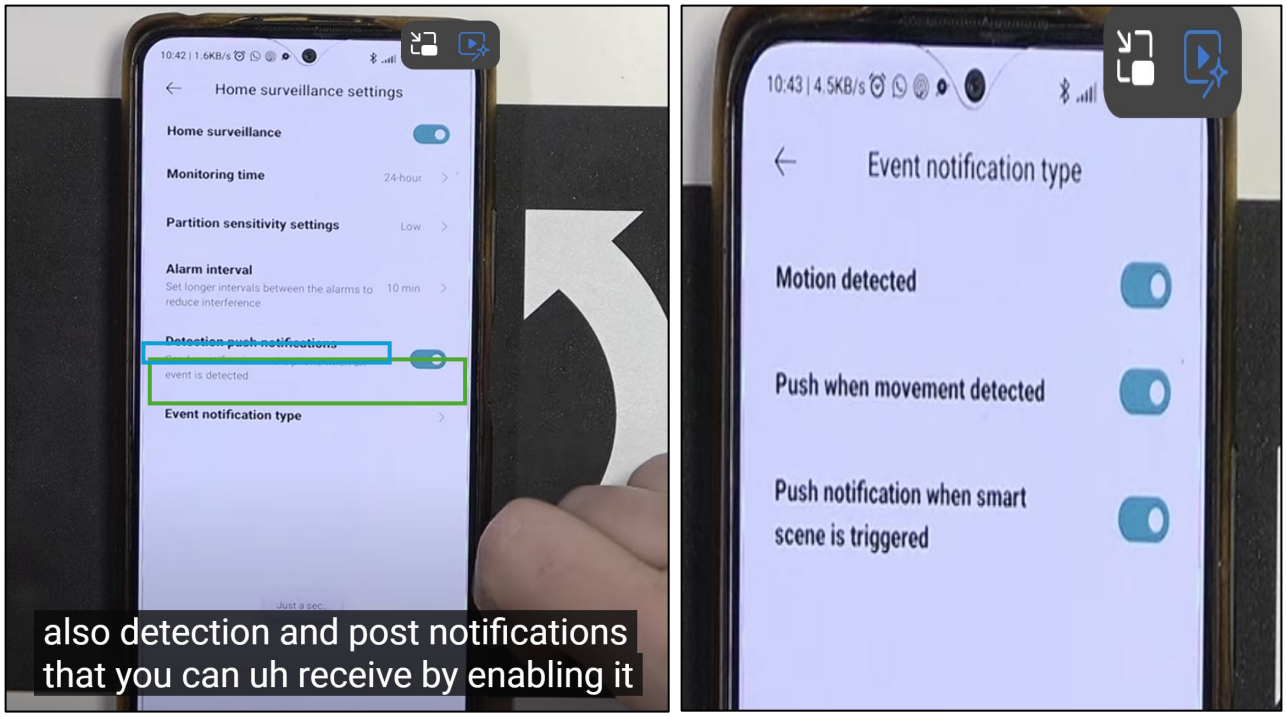
802.11), in response to detection of the change by the sensor (*e.g.*, movement or changes in light/sound/temperature detected in the monitoring area), the wireless signal comprising information corresponding to the unique identifier (*e.g.*, Serial number, UID defined by the manufacturer, name given by the user, etc.) associated with the wireless device.



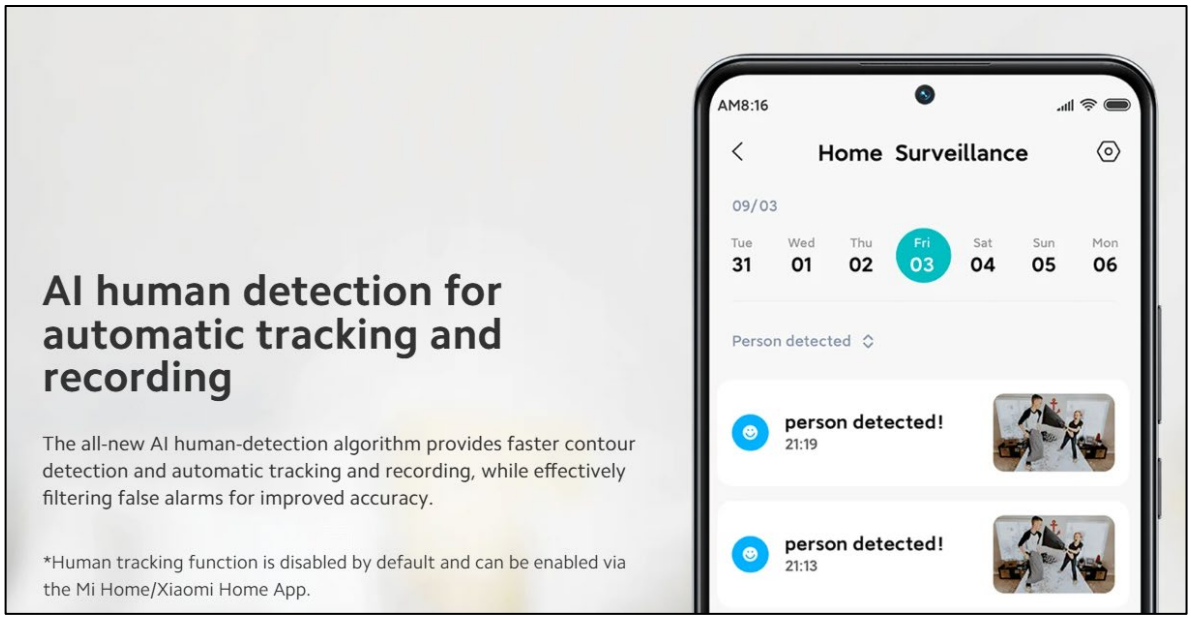
See First Setup & Connecting With App On XIAOMI Smart Camera C200.



See First Setup & Connecting With App On XIAOMI Smart Camera C200.



See How To Manage Home Survilance System On Xiaomi Smart Camera C200 - YouTube.

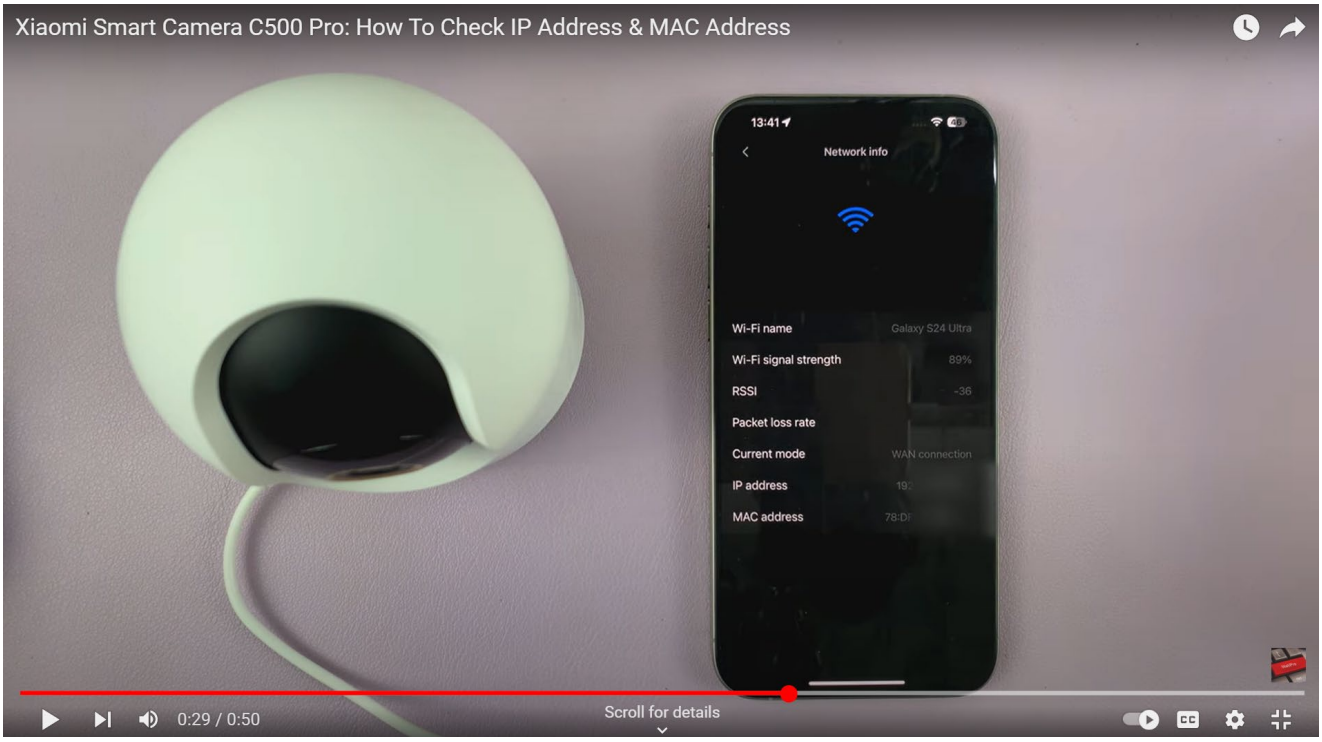


See Xiaomi Smart Camera C200.

Automatic Surveillance

- When the home surveillance assistant is enabled, the camera will record videos if it detects human movement and changes in real-time within its monitored area. Then you will receive notifications on the app.
- You can enable or disable the function of home surveillance assistant in the camera's plugin in the Mi Home/Xiaomi Home app.
- You can set surveillance of all-day, daytime, nighttime, or any other time meeting your demands. Alert sensitivity and alert time intervals can also be customized in the app.

See Xiaomi Smart Camera C200 User Manual.



See Xiaomi Smart Camera C500 Pro: How To Check IP Address & MAC Address.

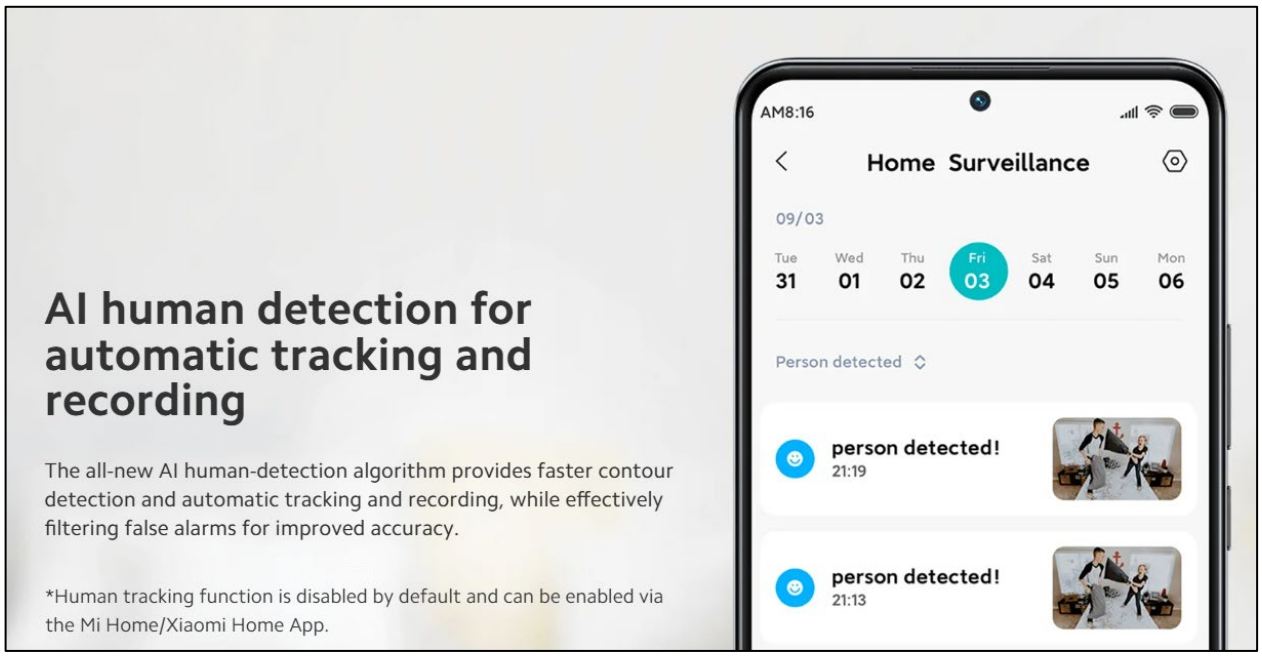
Specifications

Name: Xiaomi Smart Camera C200
Model: MJSXJ14CM
Input: 5 V ⎓ 2 A
Aperture: F2.1
Item Dimensions: 109 × 75 × 75 mm
Operating Temperature: -10°C to 40°C
Wireless Connectivity: Wi-Fi IEEE 802.11 b/g/n 2.4 GHz
Storage: MicroSD card (up to 256 GB)
Resolution: 1080p
Net Weight: Approx. 256 g
Video Codec: H.265

See Xiaomi Smart Camera C200 User Manual.

43. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein the wireless device is configured to notify a user of a status update (*e.g.*, event detected) based on the detection of the change of the condition (*e.g.*, movement or changes in light/sound/temperature detected in the monitoring area) according to a configuration setting (*e.g.*, enabling or disabling automatic

surveillance, surveillance timings, alert sensitivity, alert time intervals, etc.), the configuration setting comprising information regarding a setting for notifying the user of the status update.

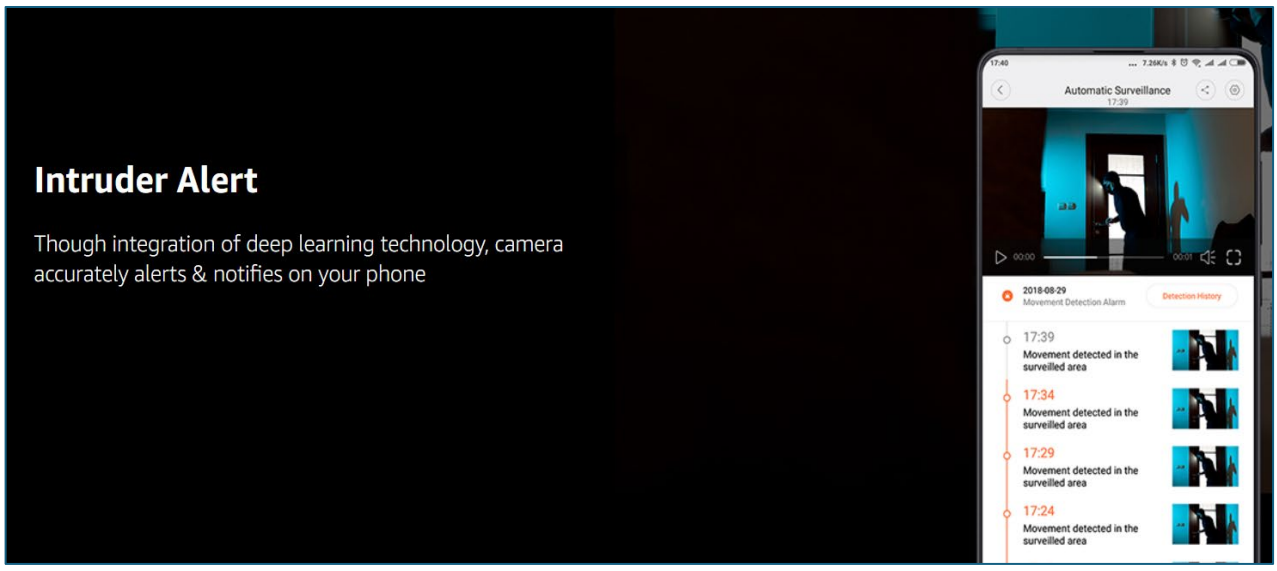


See Xiaomi Smart Camera C200.

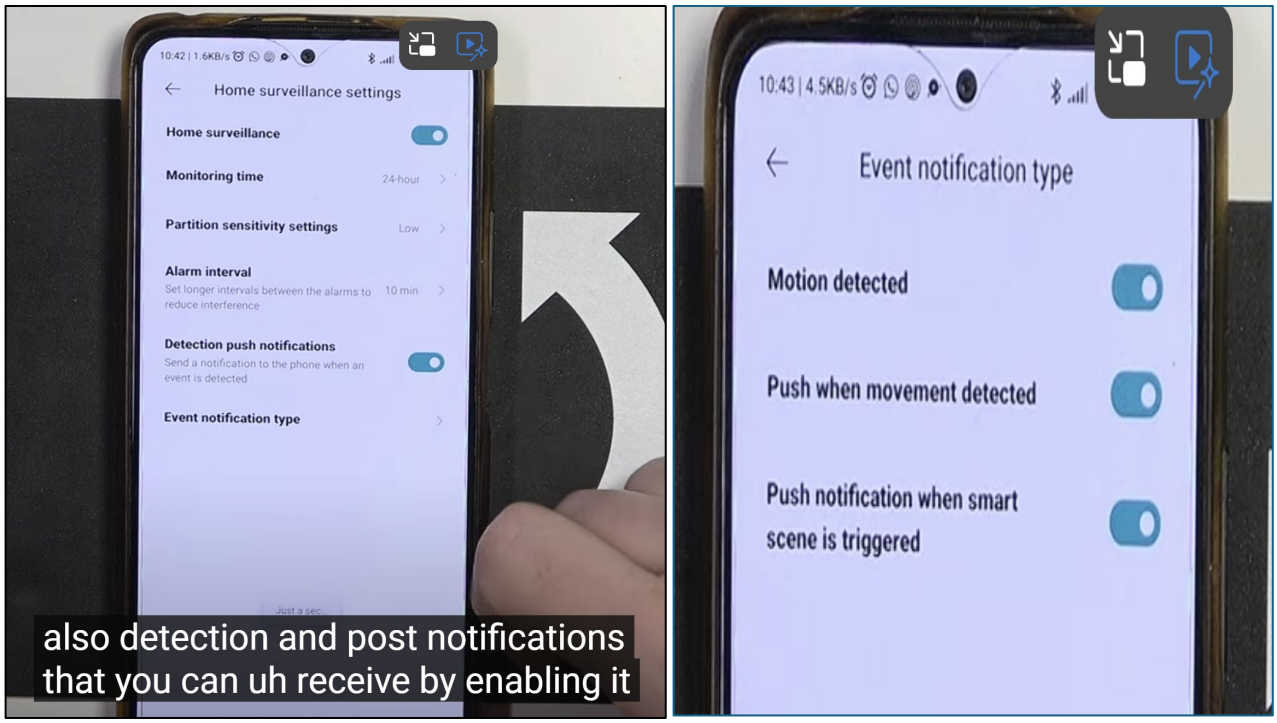
Automatic Surveillance

- When the home surveillance assistant is enabled, the camera will record videos if it detects human movement and changes in real-time within its monitored area. Then you will receive notifications on the app.
- You can enable or disable the function of home surveillance assistant in the camera's plugin in the Mi Home/Xiaomi Home app.
- You can set surveillance of all-day, daytime, nighttime, or any other time meeting your demands. Alert sensitivity and alert time intervals can also be customized in the app.

See Xiaomi Smart Camera C200 User Manual.

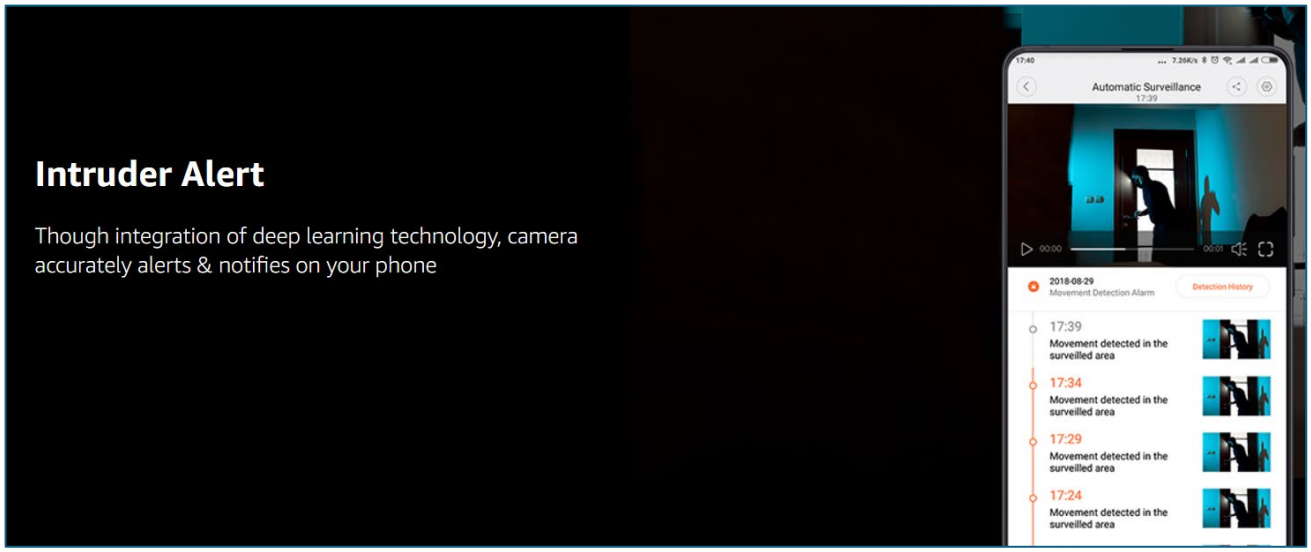


See Xiaomi Smart Camera C200, 360° Vision, AI Human Detection, Clear and Crisp Video, Enhanced Night Vision, Full Encryption for Privacy Protection, Smart Voice Control, Fast Forward Playback Speed, White.

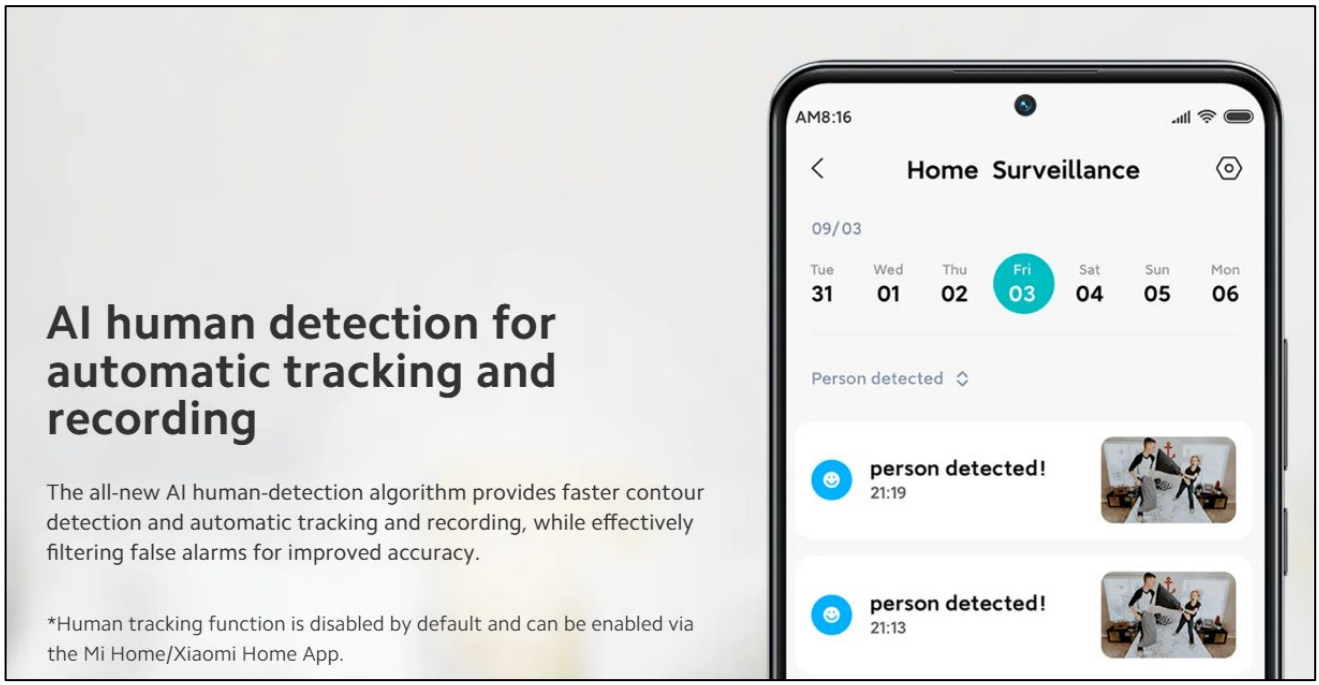


See How To Manage Home Surveillance System On Xiaomi Smart Camera C200 - YouTube.

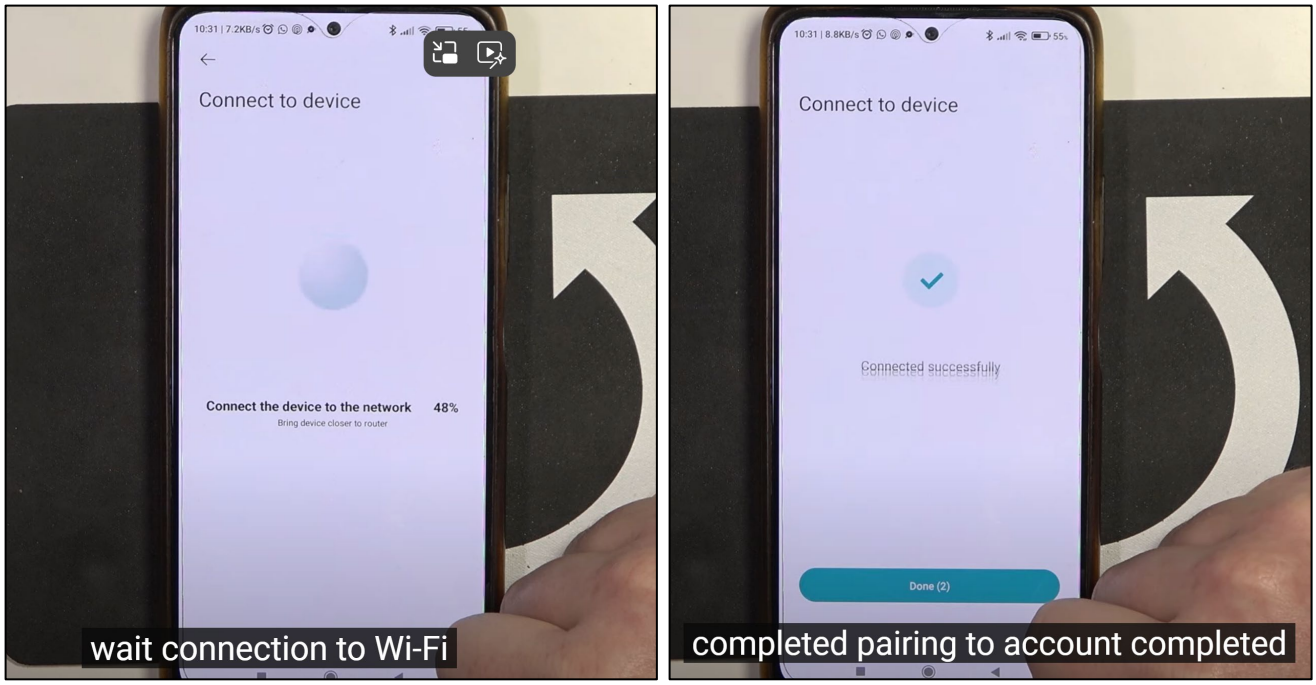
44. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein information regarding the status update (*e.g.*, event detected) is communicated to a user's mobile phone (*e.g.*, on the Mi Home/Xiaomi Home application) through the WiFi network, the WiFi network connected to a cellular network.



See Xiaomi Smart Camera C200, 360° Vision, AI Human Detection, Clear and Crisp Video, Enhanced Night Vision, Full Encryption for Privacy Protection, Smart Voice Control, Fast Forward Playback Speed, White.

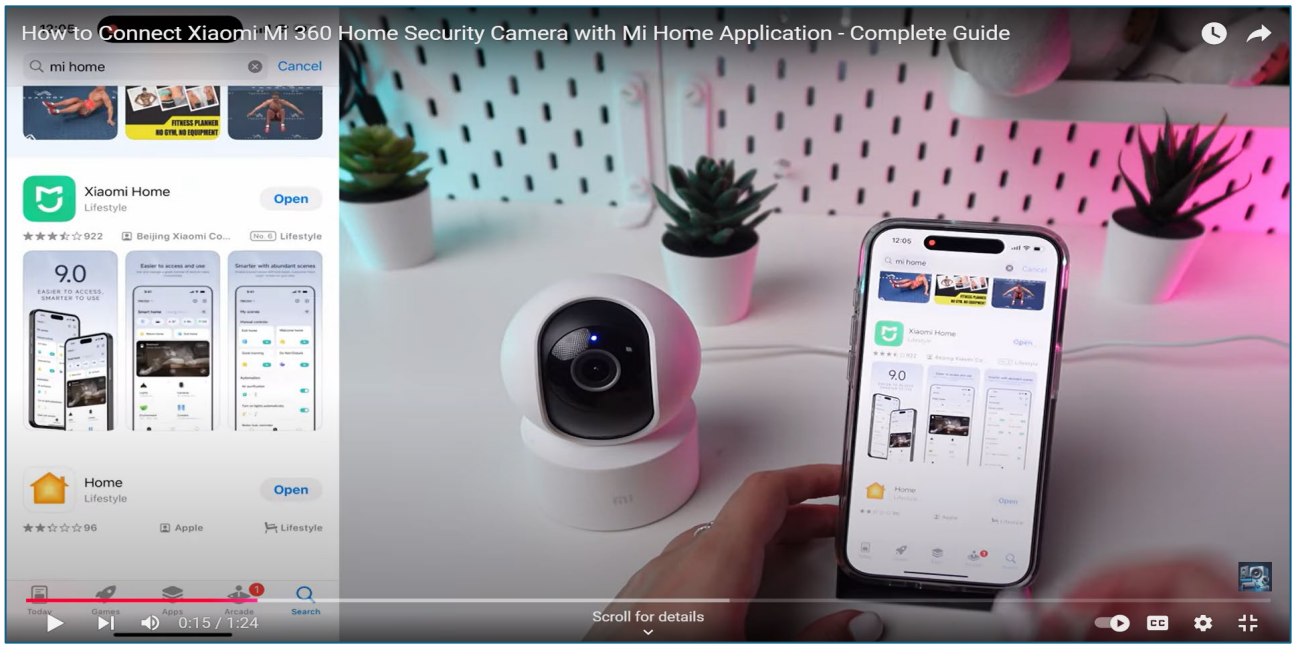


See Xiaomi Smart Camera C200.

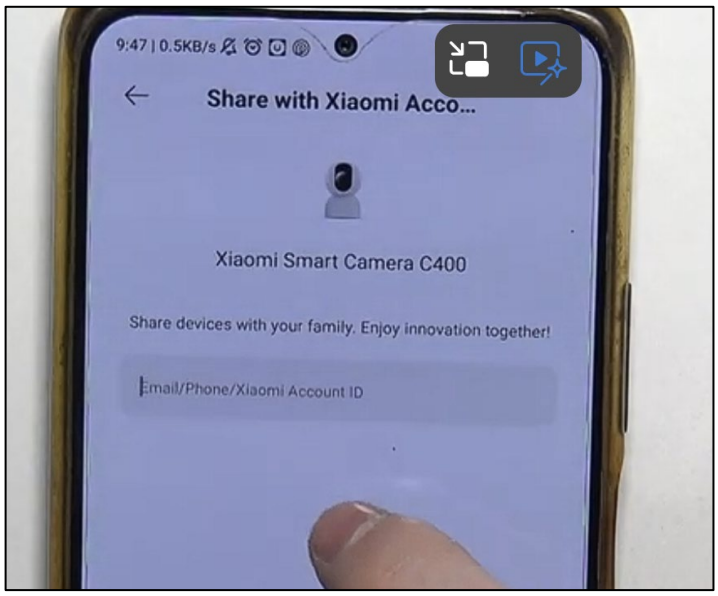


See First Setup & Connecting With App On XIAOMI Smart Camera C200.

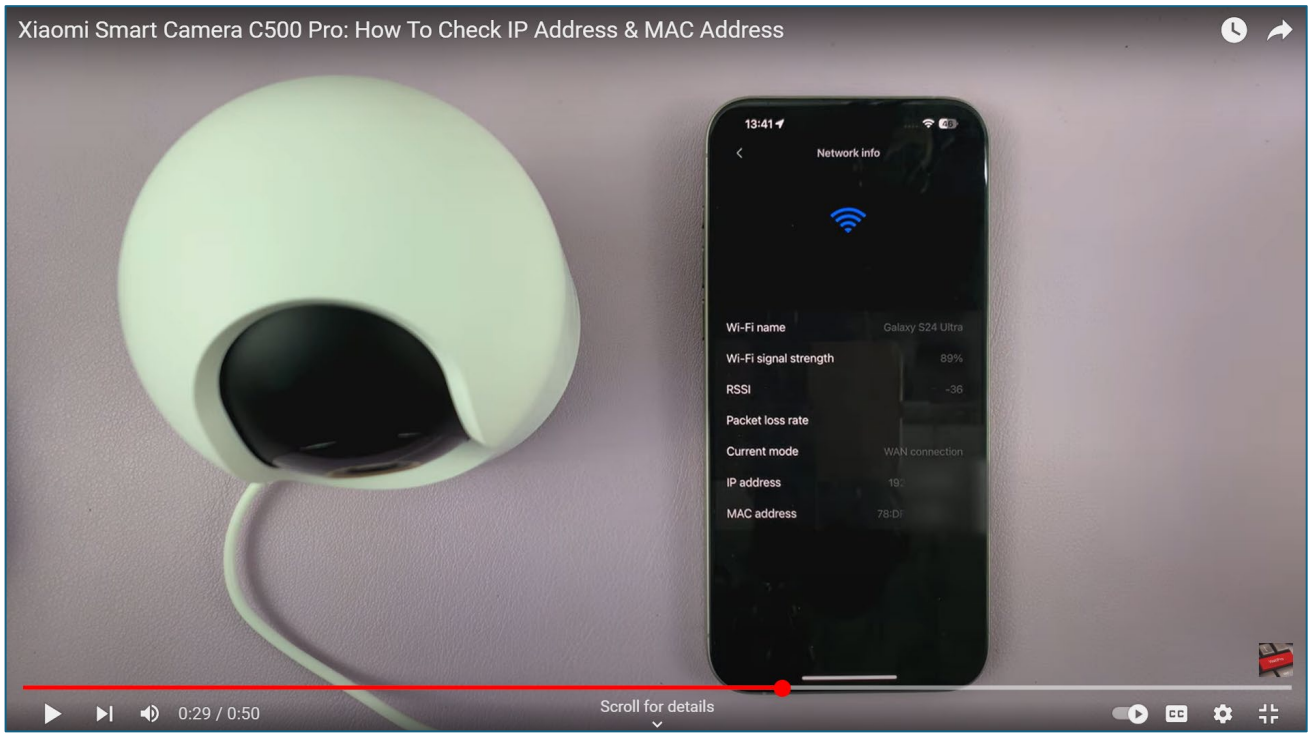
45. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein a network address (*e.g.*, IP address) for the WiFi network is associated (*e.g.*, on the Mi Home/Xiaomi Home application) with the phone identifier of the user's mobile phone (*e.g.*, user's phone number).



See How to Connect Xiaomi Mi 360 Home Security Camera with Mi Home Application - Complete Guide.



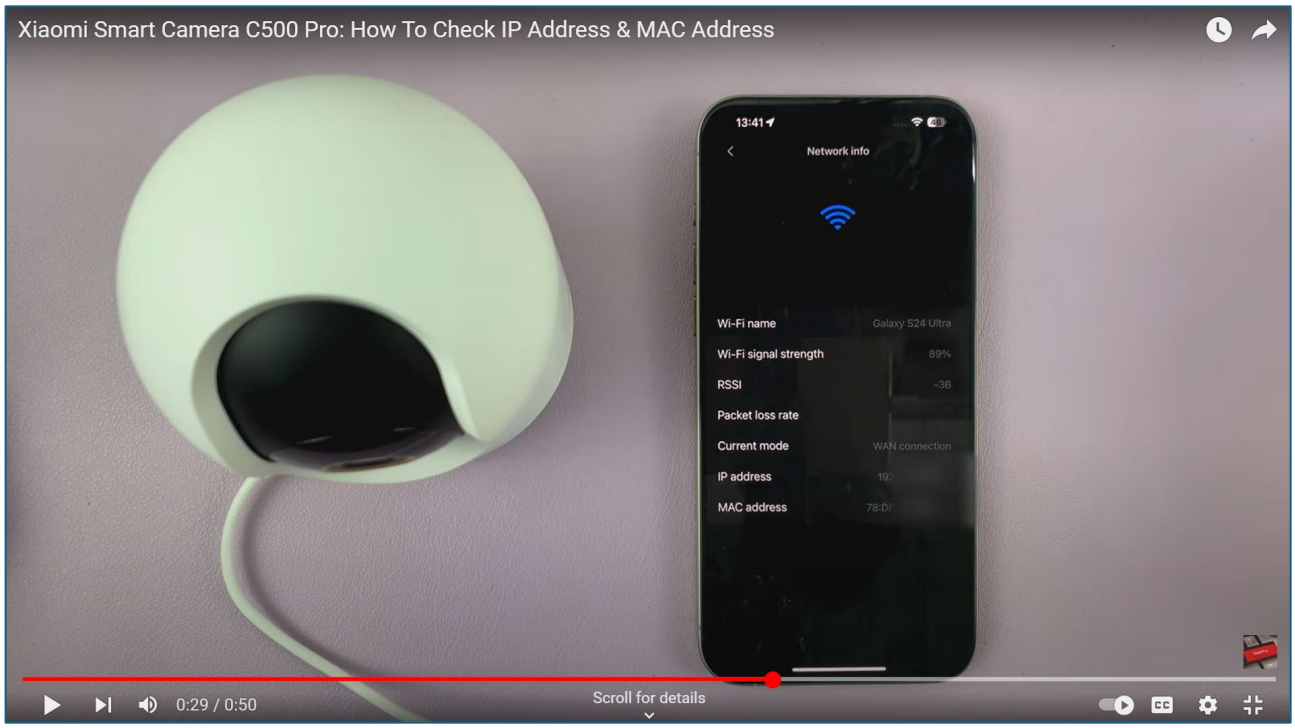
See How To Share Xiaomi C400 Access With Users & Family Members.



See Xiaomi Smart Camera C500 Pro: How To Check IP Address & MAC Address.

46. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein the unique

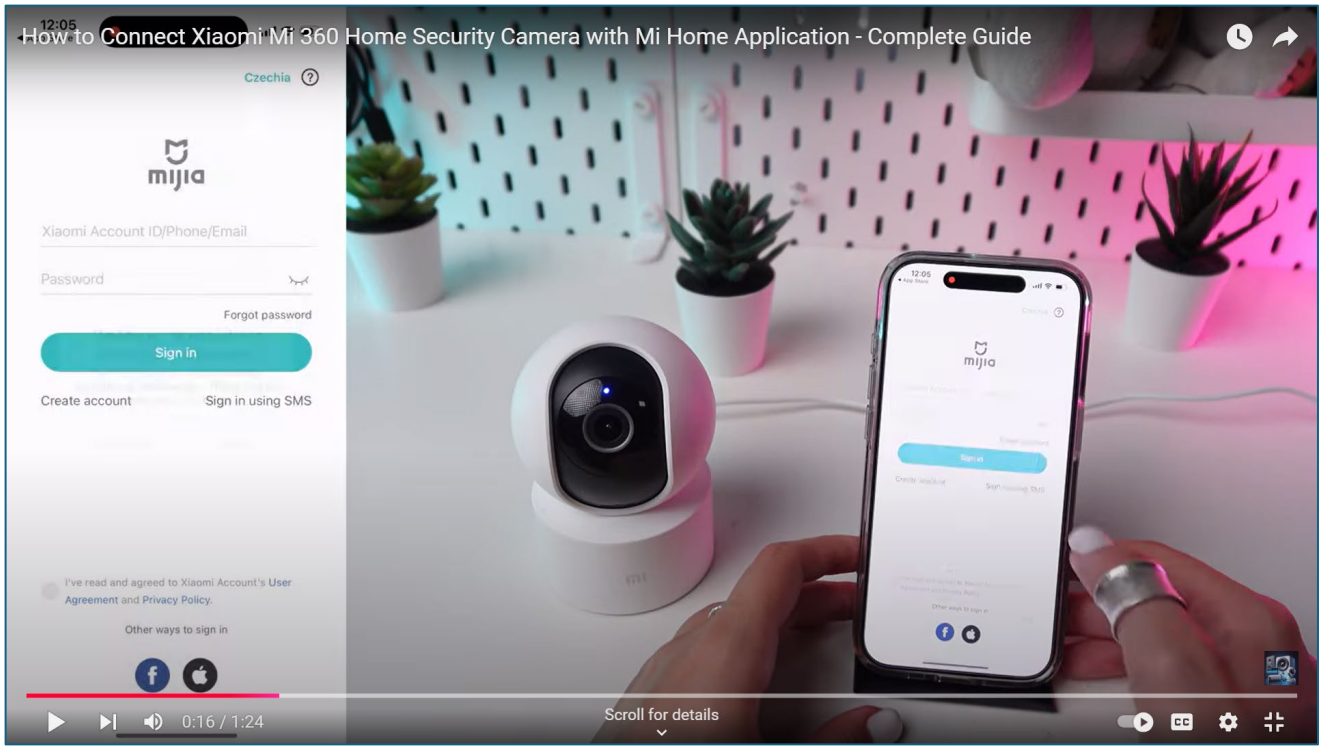
identifier (*e.g.*, Serial number, UID defined by the manufacturer, name given by the user, etc.) is associated (*e.g.*, on the Mi Home/Xiaomi Home application) with the phone identifier for the user's mobile phone (*e.g.*, user's phone number).



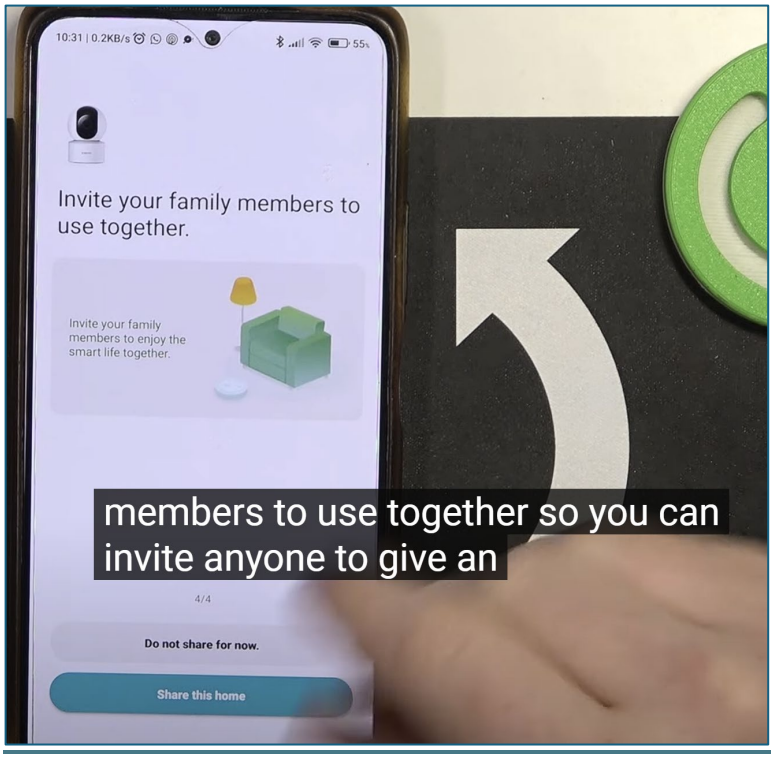
See Xiaomi Smart Camera C500 Pro: How To Check IP Address & MAC Address.

> How To Check IP Address & MAC Address Of Xiaomi Smart Camera C500 Pro:
> How To Check IP Address Of Xiaomi Smart Camera C500 Pro:
> How To Check MAC Address Of Xiaomi Smart Camera C500 Pro:
>
> Step 1: Launch the Mi Home App. Ensure that your Xiaomi Smart Camera C500 Pro is connected to the Mi Home app on your smartphone or tablet.
>
> Step 2: Select the camera you want to check these details for. Tap on the three dots in the top-right corner and select the "Additional Settings" option.
>
> Step 3: Within the additional settings menu, locate the "Network Info" option. This is where you'll find information related to the camera's network configuration. Here, you should see the camera's IP address and MAC address listed.

See Xiaomi Smart Camera C500 Pro: How To Check IP Address & MAC Address.



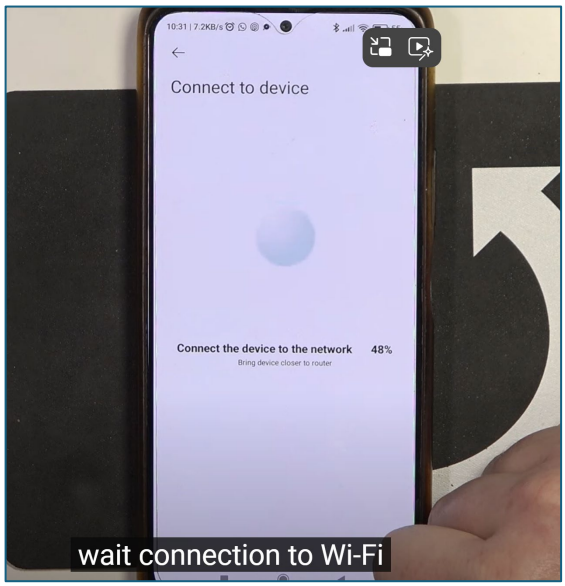
See How to Connect Xiaomi Mi 360 Home Security Camera with Mi Home Application - Complete Guide.



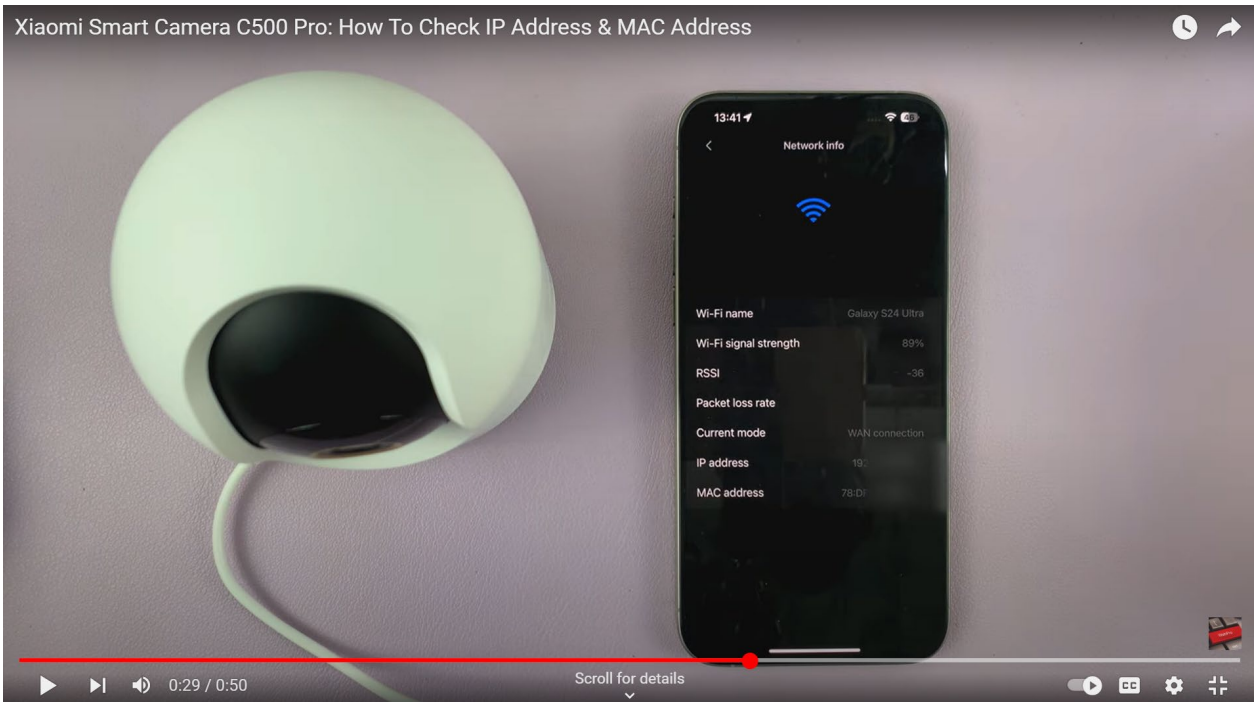
See First Setup & Connecting With App On XIAOMI Smart Camera C200.

47. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein a configured data package comprises information for the network address for the WiFi network, the configured data package (*e.g.*, used to configure the initiation of network communication for the Xiaomi Smart Camera) being from a cellular phone in initiating communications that are directed to the wireless device (*e.g.*, on the Mi Home/Xiaomi Home application).

See Xiaomi Smart Camera C200 User Manual.



See First Setup & Connecting With App On XIAOMI Smart Camera C200.



See Xiaomi Smart Camera C500 Pro: How To Check IP Address & MAC Address.

48. On information and belief, Xiaomi directly infringes at least claim 1 of the '179 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Xiaomi Products and Services.

49. Innovation Sciences has been damaged by Defendants' infringement and has caused / continues to cause it to suffer irreparable harm and damages as a result of the infringement.

Count II – Infringement of United States Patent No. 10,136,179

50. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

51. On information and belief, Xiaomi violated 35 U.S. C. § 271(a) with respect to one or more claims of the '179 patent.

52. On information and belief, Xiaomi (or those acting on its behalf) (i) makes, uses, sells, sells access to, imports, offers to sell and/or offers to sell access to the Xiaomi Products and Services in

the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 1 of '179 patent.

53. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device (*e.g.*, Xiaomi Smart Air Purifier 4 Compact) associated with a unique identifier (*e.g.*, Serial number, Unique Identifier ("UID") defined by the manufacturer, name given by the user, etc.). On information and belief and as shown below, Xiaomi Products and Services such as the Xiaomi Smart Air Purifier 4 Compact provides a wireless device that communicates via Wi-Fi. Further, the Xiaomi Smart Air Purifier 4 Compact has a unique identifier (*e.g.*, Serial number, UID defined by the manufacturer, name given by the user, etc.), which is used for identification of the air purifier during communication.

See https://www.mi.com/us/product/xiaomi-smart-air-purifier-4-compact/.

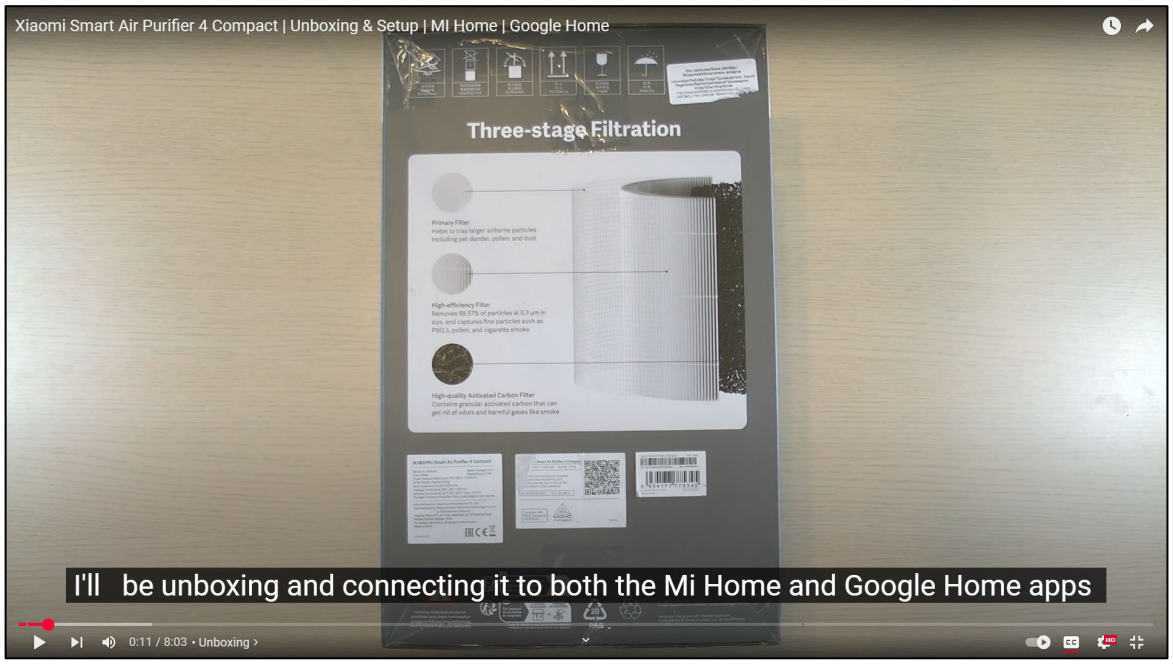
Specifications

Name: xiaomi Smart Air Purifier 4 Compact
Model: AC-M18-SC
Item Dimensions: Φ220 × H355 mm
Net Weight: Approx. 2.2 kg
Effective Coverage: 16–27 m^2*
Rated Voltage: 24 V ⎓
Power Adapter Rated Input:
100–240 V~, 50/60 Hz
Rated Power: 27 W
Noise Level: ≤60 dB(A)
*Calculated according to standard GB/T 18801–2015

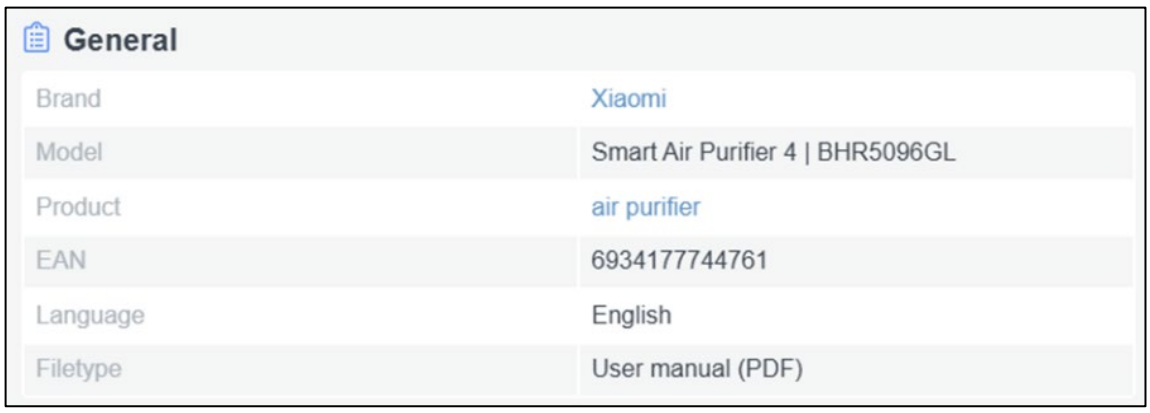
Particle's Clean Air Delivery Rate (CADR Particle): 230 m^3/h
Particle Purification Efficiency: High
Network Standby Power Consumption: < 2.00 W
Wireless Connectivity: Wi-Fi IEEE 802.11 b/g/n 2.4 GHz
Storage Temperature: -10°C to 40 °C
Storage Humidity: 5%–90% RH
Production Date: See packaging
For details of the importer, please refer to the box.

RF Specification:
Operation Frequency: 2400–2483.5 MHz
Maximum Output Power: <20 dBm
Under normal use of condition, this equipment should be kept a separation distance of at least 20 cm between the antenna and the body of the user.

See https://manuals.plus/m/114c62b5473dac1ce95223665a041db7facd11f34d0c9b786b89f89279713bf1_optim.pdf; Xiaomi Smart Air Purifier 4 Compact User Manual.



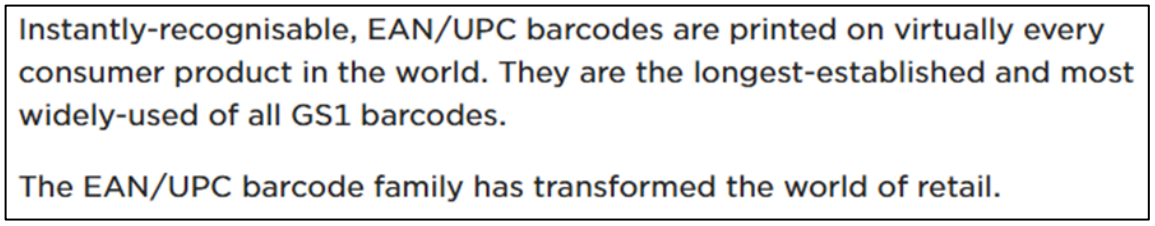
See https://www.youtube.com/watch?v=NjG027___OQ; Xiaomi Smart Air Purifier 4 Compact | Unboxing & Setup | MI Home | Google Home.



General

Brand	Xiaomi
Model	Smart Air Purifier 4 | BHR5096GL
Product	air purifier
EAN	6934177744761
Language	English
Filetype	User manual (PDF)

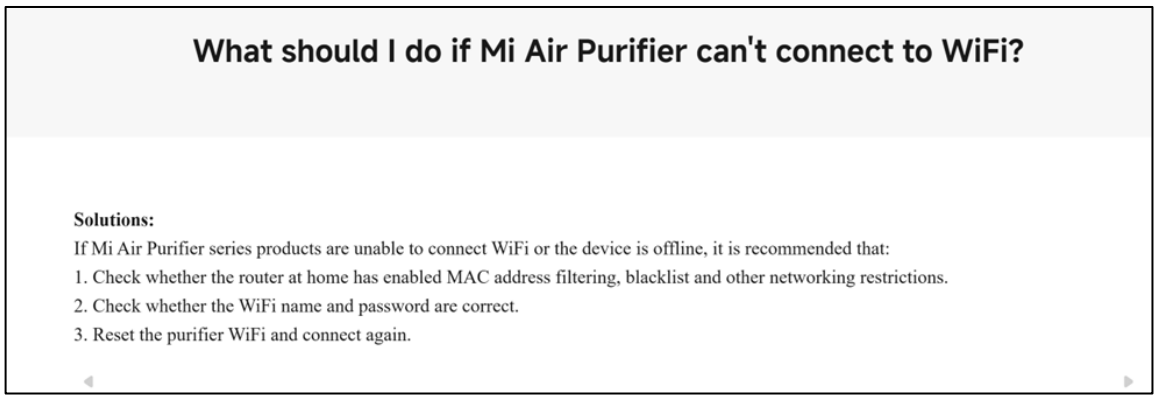
See https://www.manual.nz/xiaomi/smart-air-purifier-4/manual#google_vignette; Xiaomi Smart Air Purifier 4 manual.



Instantly-recognisable, EAN/UPC barcodes are printed on virtually every consumer product in the world. They are the longest-established and most widely-used of all GS1 barcodes.

The EAN/UPC barcode family has transformed the world of retail.

See https://www.gs1.org/standards/barcodes/ean-upc; EAN/UPC barcodes.



What should I do if Mi Air Purifier can't connect to WiFi?

Solutions:

If Mi Air Purifier series products are unable to connect WiFi or the device is offline, it is recommended that:

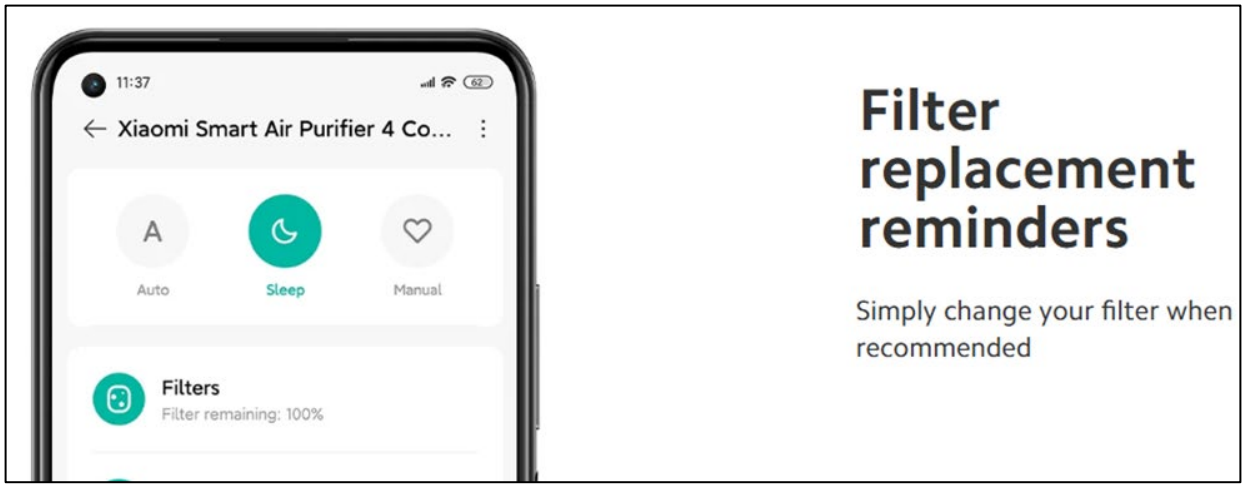
1. Check whether the router at home has enabled MAC address filtering, blacklist and other networking restrictions.
2. Check whether the WiFi name and password are correct.
3. Reset the purifier WiFi and connect again.

See https://www.mi.com/global/support/faq/details/KA-06713/; What should I do if Mi Air Purifier can't connect to WiFi?.

54. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising a sensor (*e.g.*, PM2.5, Humidity sensor, temperature sensor, and PM10) configured to detect a change of a condition (*e.g.*, condition of a filter).

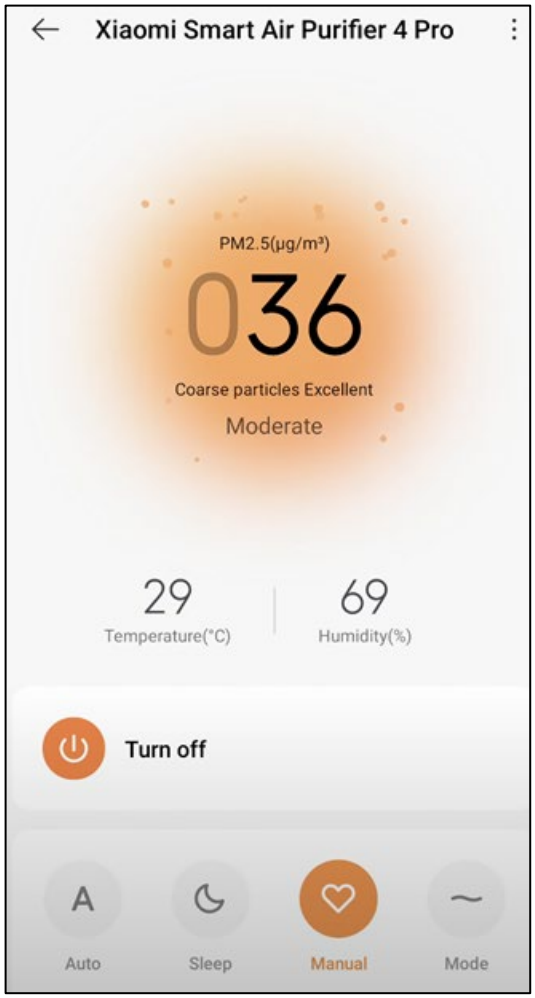
	Mi Air Purifier 4 Lite	Mi Air Purifier 4	Xiaomi Smart Air Purifier 4 Pro
Filter expanded area	2 m2	2.4 m2	2.6 m2
Activated carbon	450g	550g	650g
Particle Clean Air Delivery (PCADR)	360 m3/h	400 m3/h	500 m3/h
Coverage Area	25-43 m2	28-48 m2	35-60 m2
Formaldehyde Clean Air Delivery (FCADR)	Couldn't find this info	150 m3/h	185 m3/h
Filter lifespan	6-12 month	6-12 month	6-12 month
Sensors	PM2.5+Humi+Temp	PM2.5+Humi+Temp	PM2.5+Humi+Temp + PM10
Negative Ion Generator	x	✓	✓
Detachable top grille	x	✓	✓
Noise level	33.4~?? db(A)	32.1~63 db(A)	33.7~65 db(A)
Rated power	33W	30W	50W
Air quality display	4 levels	4 levels	4 levels

See https://www.youtube.com/watch?v=MC8cE2Zwl5c; Xiaomi Mi Air Purifier 4 Pro Review & Impressions.

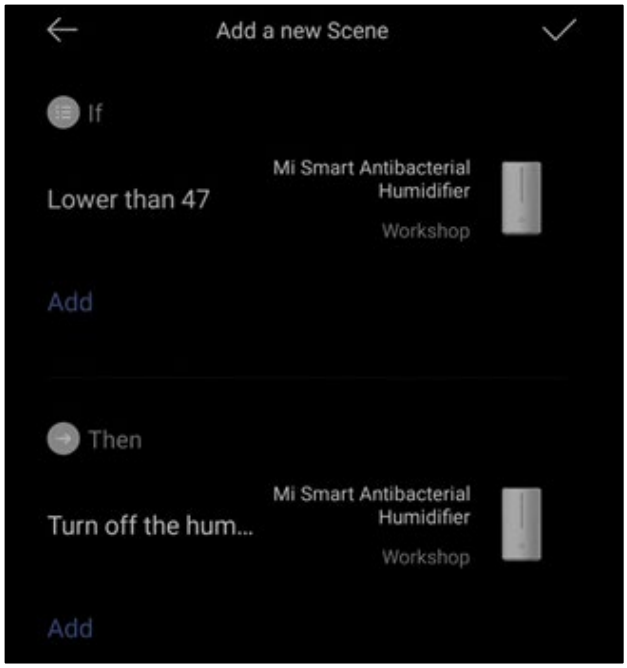


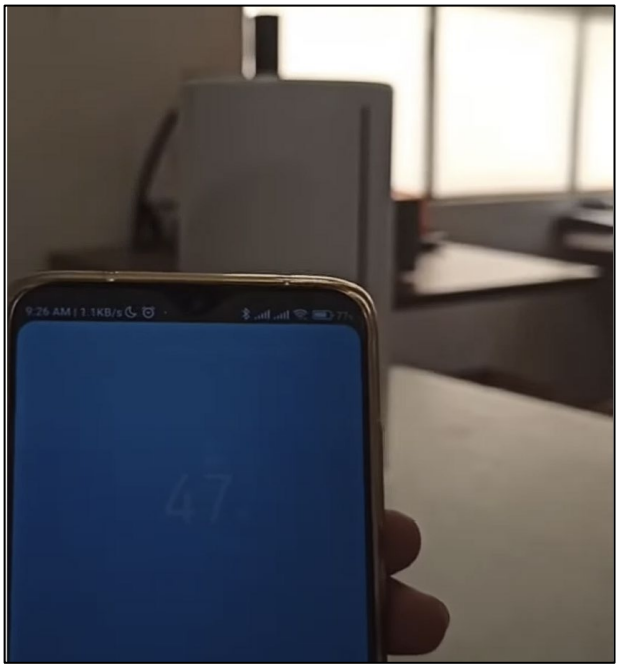
See https://www.mi.com/us/product/xiaomi-smart-air-purifier-4-compact/; Xiaomi Smart Air Purifier 4 Compact.

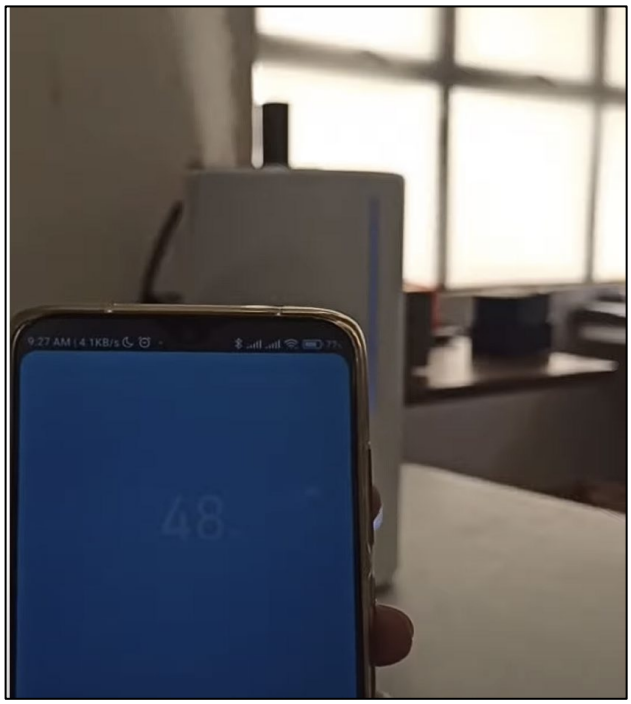
55. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising a transmitter (*e.g.*, Wi-Fi transmitter) configured to send a wireless signal (*e.g.*, signal comprising sensor data), via a WiFi network, in response to detection of the change by the sensor (*e.g.*, a level detected by the one or more sensors), the wireless signal comprising information corresponding to the unique identifier (*e.g.*, Serial number, UID, name given by the user) associated with the wireless device.



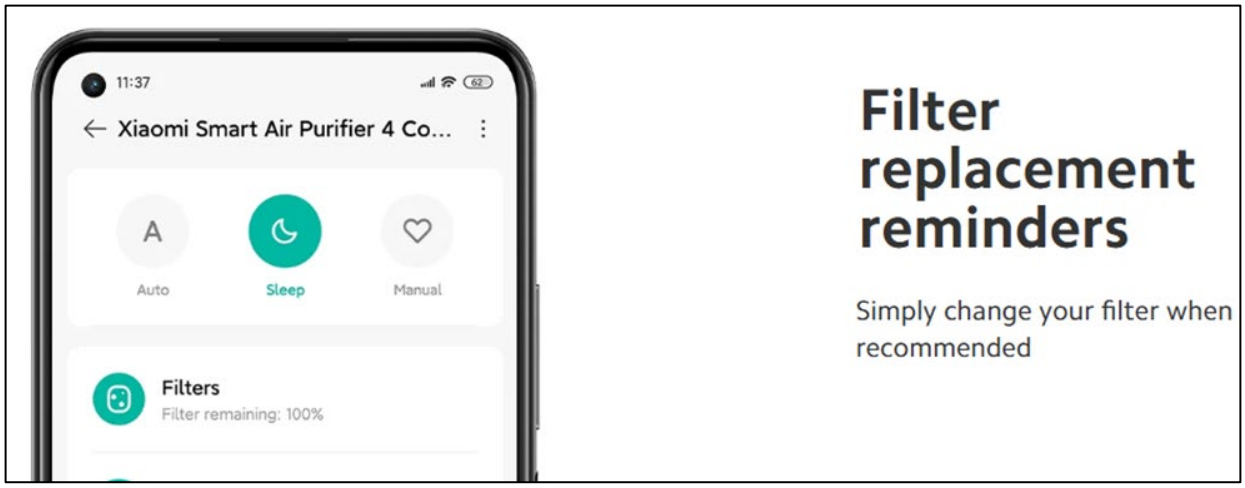
See https://www.youtube.com/watch?v=RGvc9If2K9w; How to setup Mi Smart Air Purifier 4 Pro with Mi Home app.







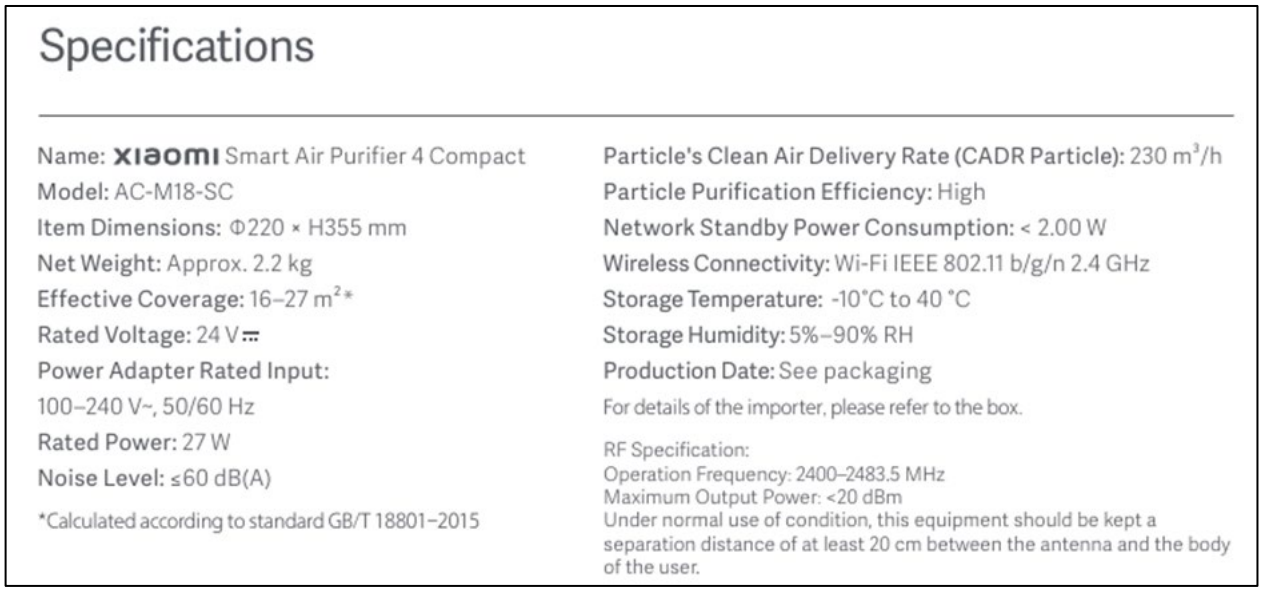
See https://www.youtube.com/watch?v=HbzFYgmZ8NY; How do I add a smart scene to the Xiaomi Smart Antibacterial Humidifier?.



See https://www.mi.com/us/product/xiaomi-smart-air-purifier-4-compact/; Xiaomi Smart Air Purifier 4 Compact.

> The Xiaomi smart air purifier 4 also comes equipped with a range of smart features which can be accessed through the Mi Home app. These features include real-time air quality monitoring and control, automatic filter replacement reminders, and scheduling functions, making it easy to maintain optimal air quality in any indoor environment.

See https://www.manual.nz/xiaomi/smart-air-purifier-4/manual; Xiaomi Smart Air Purifier 4 manual.



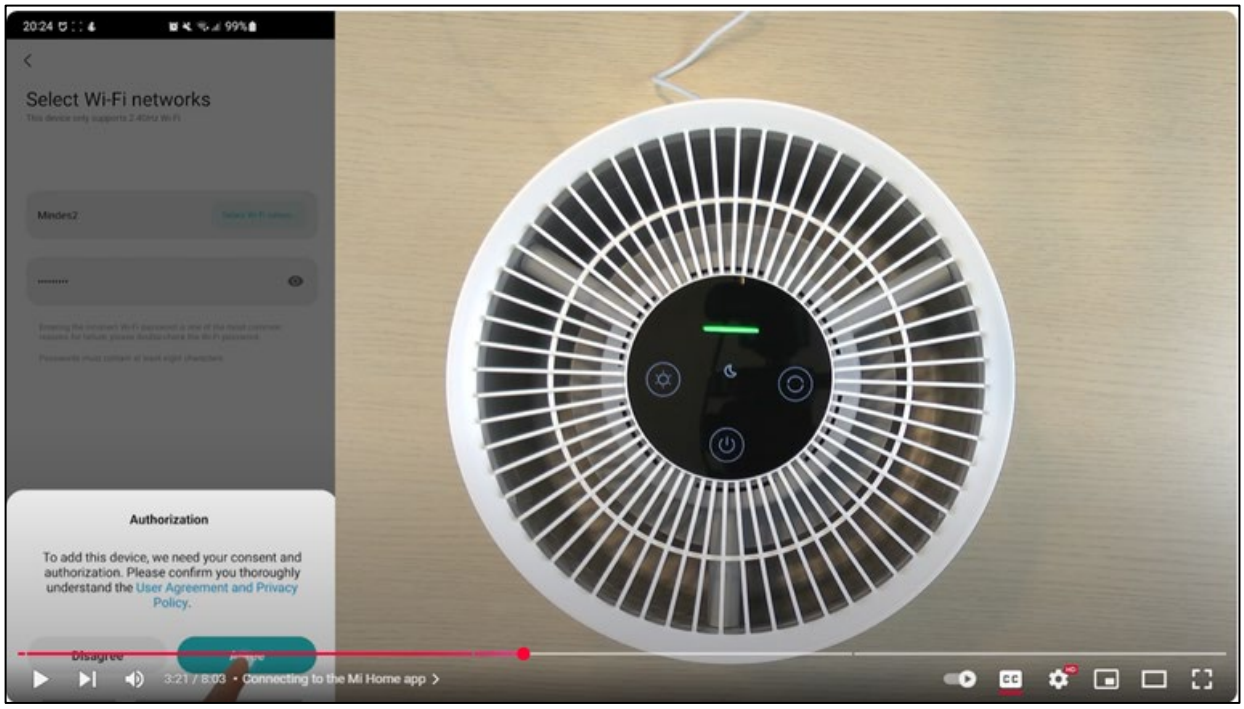
Specifications

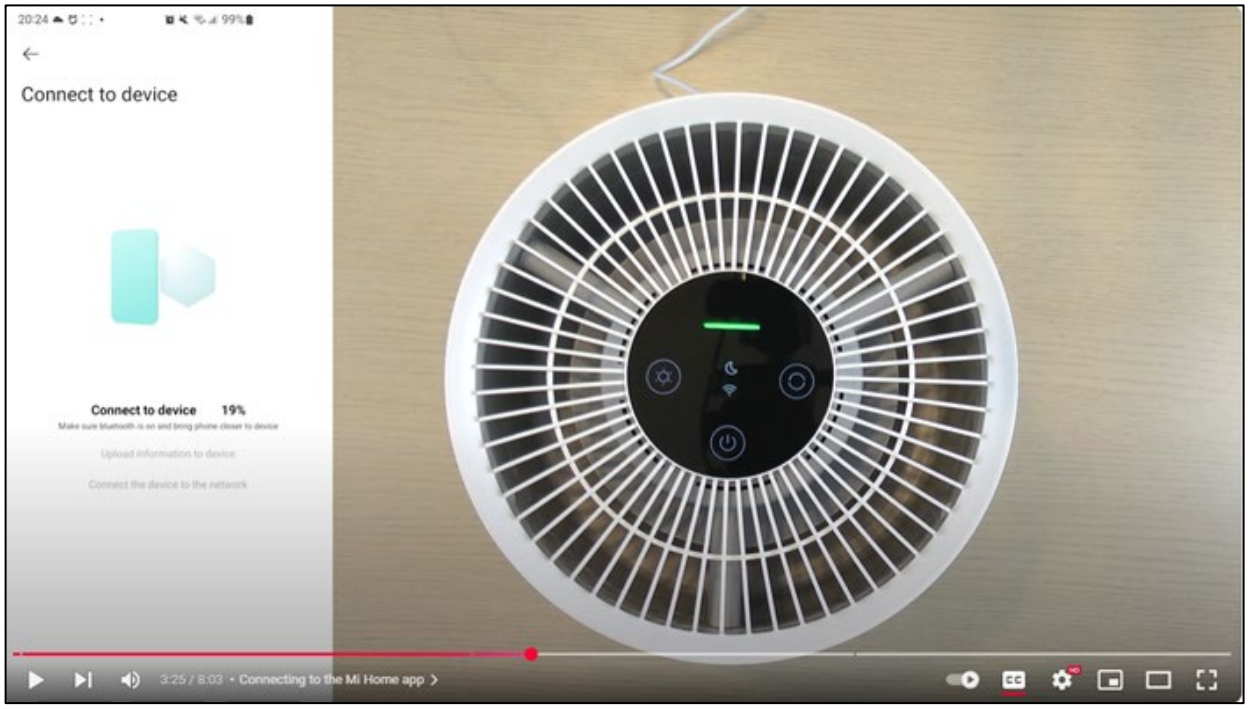
Name: xiaomi Smart Air Purifier 4 Compact
Model: AC-M18-SC
Item Dimensions: Φ220 × H355 mm
Net Weight: Approx. 2.2 kg
Effective Coverage: 16–27 m^2*
Rated Voltage: 24 V ⎓
Power Adapter Rated Input:
100–240 V~, 50/60 Hz
Rated Power: 27 W
Noise Level: ≤60 dB(A)
*Calculated according to standard GB/T 18801–2015

Particle's Clean Air Delivery Rate (CADR Particle): 230 m^3/h
Particle Purification Efficiency: High
Network Standby Power Consumption: < 2.00 W
Wireless Connectivity: Wi-Fi IEEE 802.11 b/g/n 2.4 GHz
Storage Temperature: -10°C to 40 °C
Storage Humidity: 5%–90% RH
Production Date: See packaging
For details of the importer, please refer to the box.

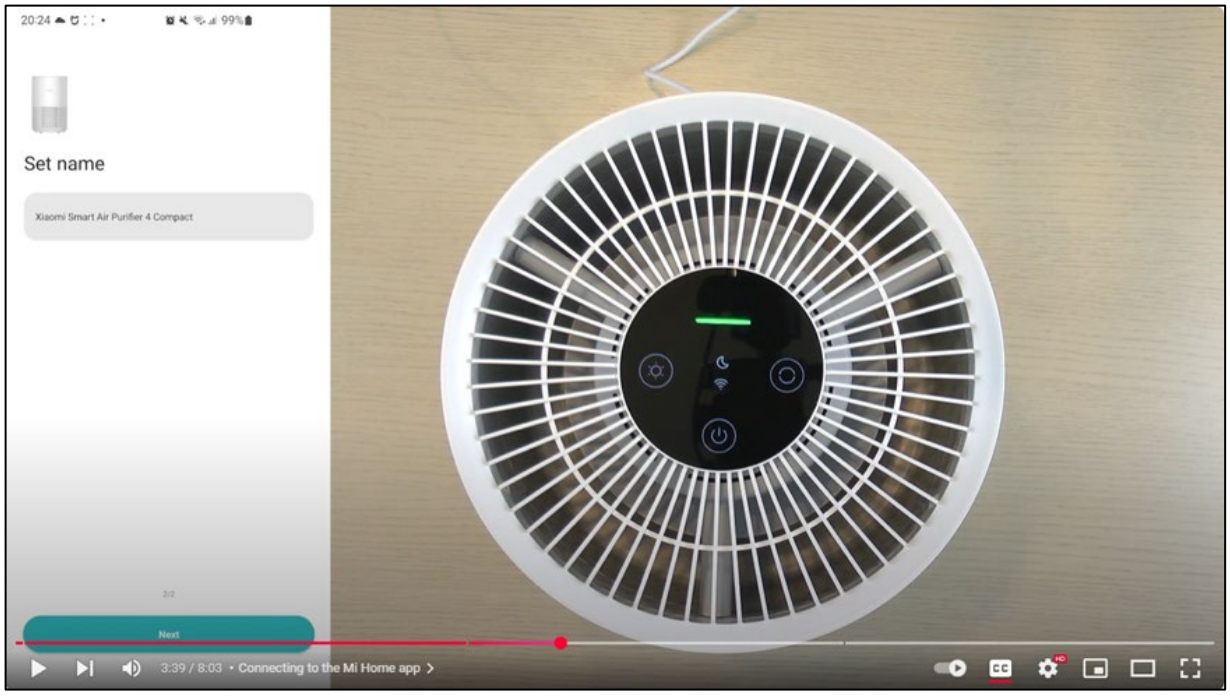
RF Specification:
Operation Frequency: 2400–2483.5 MHz
Maximum Output Power: <20 dBm
Under normal use of condition, this equipment should be kept a separation distance of at least 20 cm between the antenna and the body of the user.

See https://manuals.plus/m/114c62b5473dac1ce95223665a041db7facd11f34d0c9b786b89f89279713bf1_optim.pdf; Xiaomi Smart Air Purifier 4 Compact User Manual.


Select Wi-Fi networks
Authorization
To add this device, we need your consent and authorization. Please confirm you thoroughly understand the User Agreement and Privacy Policy.
Disagree
3:21 / 8:03 • Connecting to the Mi Home app >

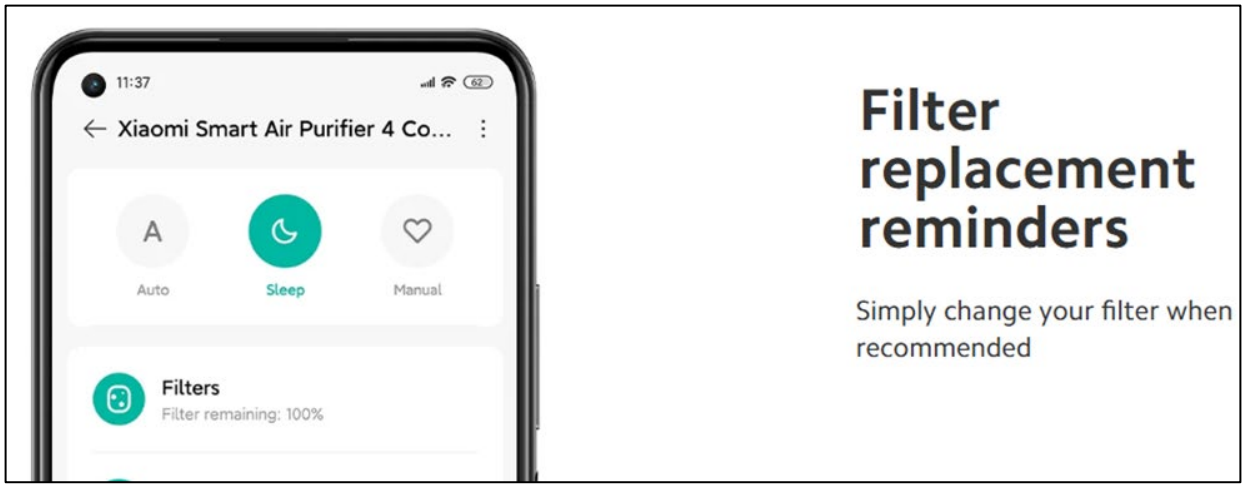

Connect to device
Connect to device 19%
3:25 / 8:03 • Connecting to the Mi Home app >

See https://www.youtube.com/watch?v=NjG027___OQ; Xiaomi Smart Air Purifier 4 Compact | Unboxing & Setup | MI Home | Google Home.



See https://www.youtube.com/watch?v=NjG027___OQ; Xiaomi Smart Air Purifier 4 Compact | Unboxing & Setup | MI Home | Google Home.

56. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein the wireless device is configured to notify a user of a status update (*e.g.*, the reminder is sent to the user when the Smart Air purifier 4's filter needs to be changed) based on the detection of the change of the condition (*e.g.*, sensor data) according to a configuration setting, the configuration setting comprising information regarding a setting for notifying the user of the status update (*e.g.*, Smart Air Purifier is configured to send the filter replacement reminder to the user when the filter life determined by the purifier is less than or equal to 10%).



See https://www.mi.com/us/product/xiaomi-smart-air-purifier-4-compact/; Xiaomi Smart Air Purifier 4 Compact.

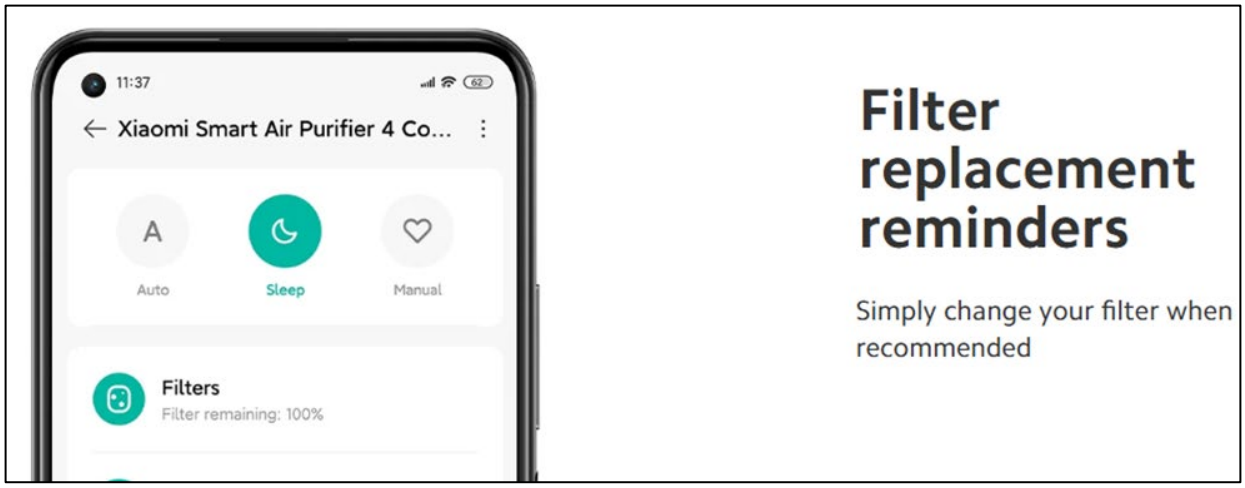
> The Xiaomi smart air purifier 4 also comes equipped with a range of smart features which can be accessed through the Mi Home app. These features include real-time air quality monitoring and control, automatic filter replacement reminders, and scheduling functions, making it easy to maintain optimal air quality in any indoor environment.

See https://www.manual.nz/xiaomi/smart-air-purifier-4/manual; Xiaomi Smart Air Purifier 4 manual.

17. Q: How is the lifespan of Xiaomi Smart Air Purifier 4Filter calculated?
A: Xiaomi Smart Air Purifier 4 will automatically and comprehensively calculate the service life of the Filter according to the air quality of the use environment, the purifier operating mode, operating speed and time. If the air quality of the purifier is poor, the filter life will be shorter; if the air quality is better, the filter life will be longer. Overall, the filter life is about 6 to 9 months.
18. Q: How often does Xiaomi Smart Air Purifier 4 usually replace the Filter?
A: If the purifier is in poor air quality, the filter life will be shorter; if the air quality is better, the filter life will be longer. Overall, the filter life is about 3 to 6 months. If the filter life recorded by the purifier is less than or equal to 10%, the user will be reminded to recommend replacement from the display screen and APP, and one-click purchase on the mobile phone is supported.

See https://www.mi.com/global/support/faq/details/KA-11380/; Xiaomi Smart Air Purifier 4 FAQ.

57. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein information regarding the status update (*e.g.*, the filter replacement reminder) is communicated to a user's mobile phone (*e.g.*, on the Mi Home/Xiaomi Home application) through the WiFi network, the WiFi network connected to a cellular network.



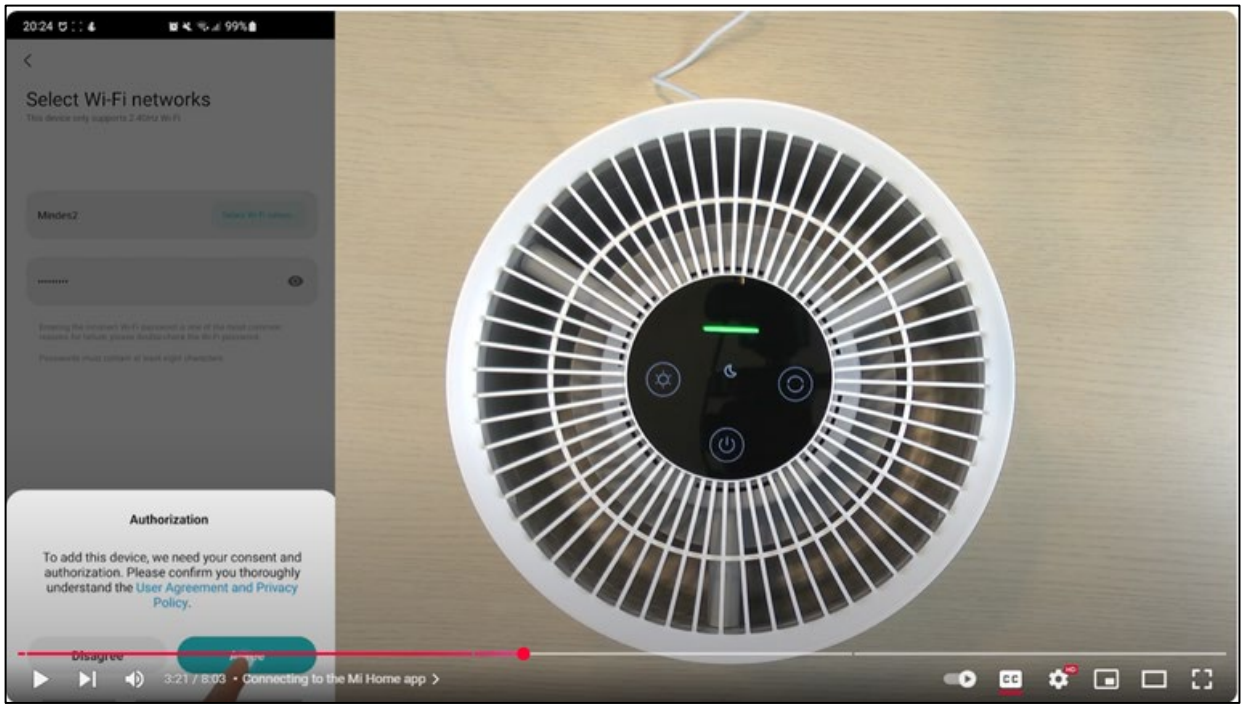
See https://www.mi.com/us/product/xiaomi-smart-air-purifier-4-compact/; Xiaomi Smart Air Purifier 4 Compact.

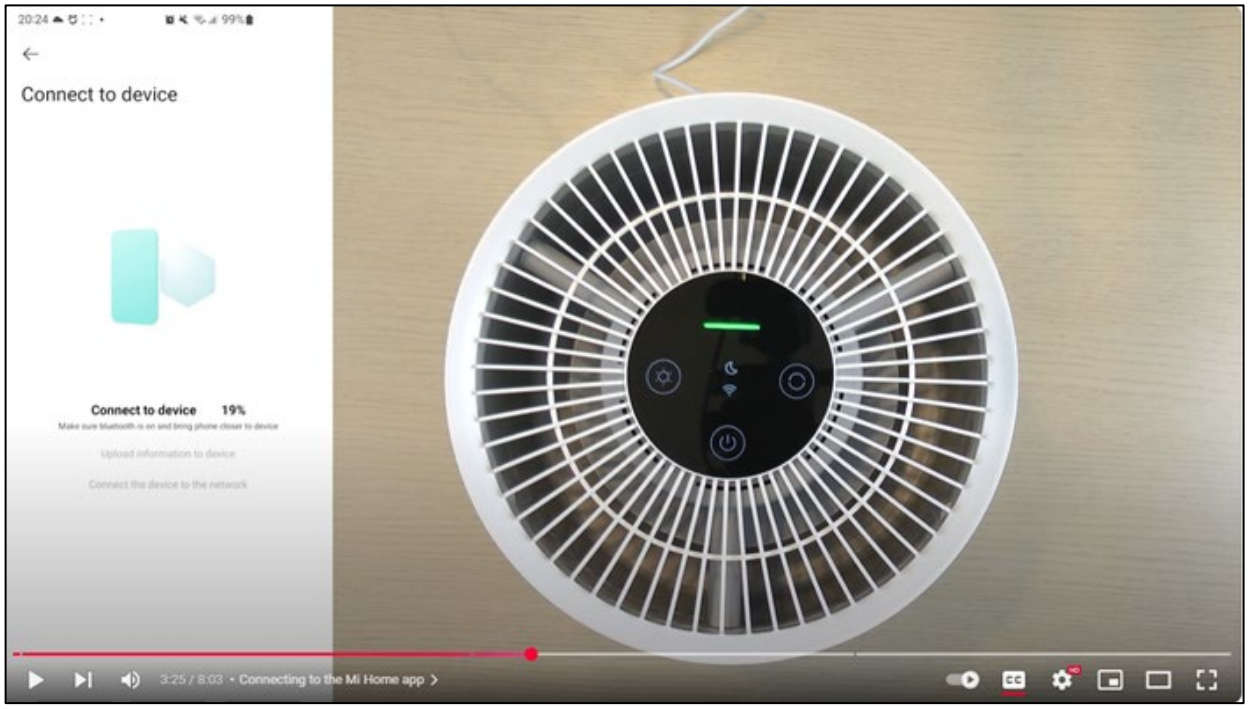
> The Xiaomi smart air purifier 4 also comes equipped with a range of smart features which can be accessed through the Mi Home app. These features include real-time air quality monitoring and control, automatic filter replacement reminders, and scheduling functions, making it easy to maintain optimal air quality in any indoor environment.

See https://www.manual.nz/xiaomi/smart-air-purifier-4/manual; Xiaomi Smart Air Purifier 4 manual.

> 17. Q: How is the lifespan of Xiaomi Smart Air Purifier 4Filter calculated?
> A: Xiaomi Smart Air Purifier 4 will automatically and comprehensively calculate the service life of the Filter according to the air quality of the use environment, the purifier operating mode, operating speed and time. If the air quality of the purifier is poor, the filter life will be shorter; if the air quality is better, the filter life will be longer. Overall, the filter life is about 6 to 9 months.
> 18. Q: How often does Xiaomi Smart Air Purifier 4 usually replace the Filter?
> A: If the purifier is in poor air quality, the filter life will be shorter; if the air quality is better, the filter life will be longer. Overall, the filter life is about 3 to 6 months. If the filter life recorded by the purifier is less than or equal to 10%, the user will be reminded to recommend replacement from the display screen and APP, and one-click purchase on the mobile phone is supported.

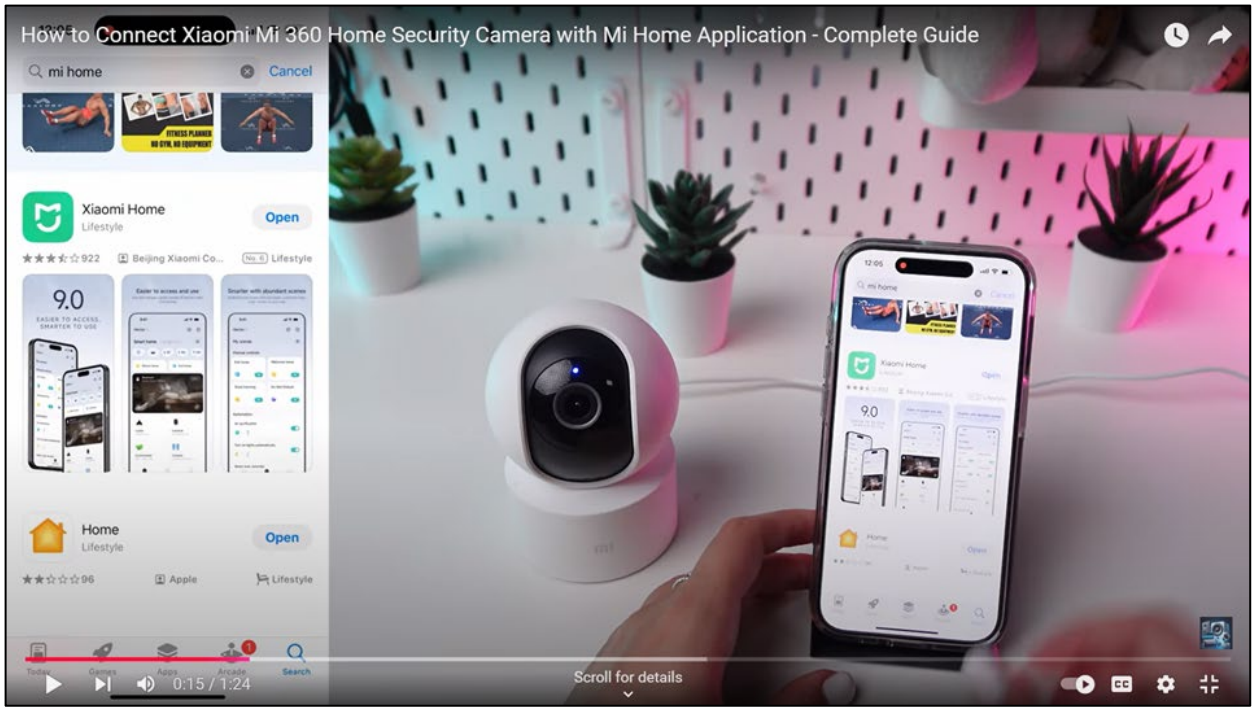
See https://www.mi.com/global/support/faq/details/KA-11380/; Xiaomi Smart Air Purifier 4 FAQ.


Select Wi-Fi networks
Authorization
To add this device, we need your consent and authorization. Please confirm you thoroughly understand the User Agreement and Privacy Policy.
Disagree
3:21 / 8:03 • Connecting to the Mi Home app >

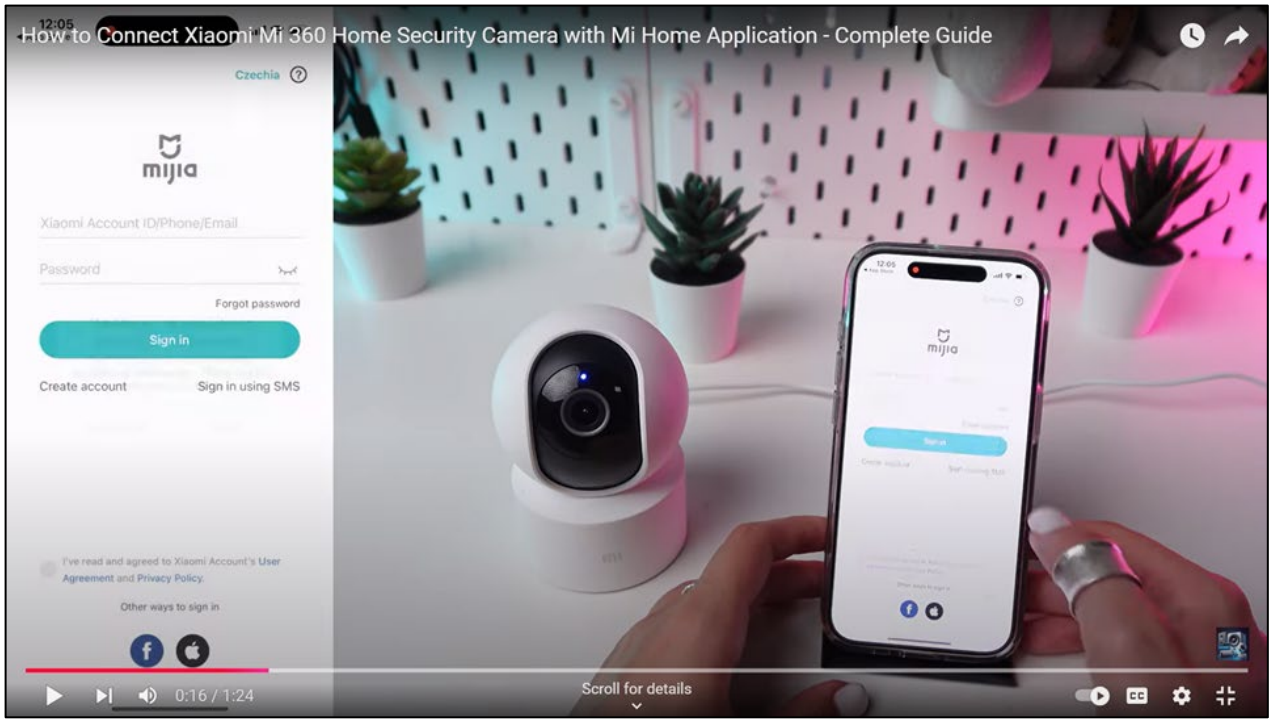

Connect to device
Connect to device 19%
3:25 / 8:03 • Connecting to the Mi Home app >

See https://www.youtube.com/watch?v=NjG027___OQ; Xiaomi Smart Air Purifier 4 Compact | Unboxing & Setup | MI Home | Google Home.

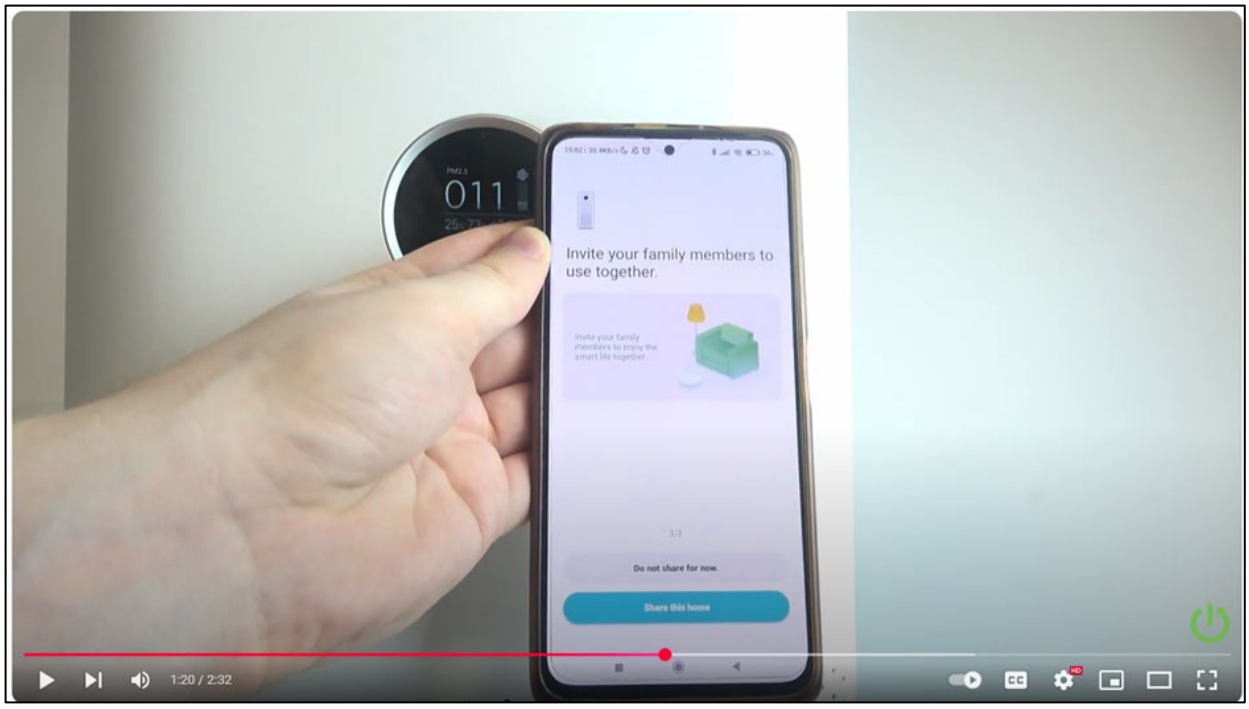
58. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein a network address (*e.g.*, IP address) for the WiFi network is associated with the phone identifier (*e.g.*, user's phone number) of the user's mobile phone.



See https://www.youtube.com/watch?v=pNJQ-hy9HTk; How to Connect Xiaomi Mi 360 Home Security Camera with Mi Home Application - Complete Guide.



See https://www.youtube.com/watch?v=pNJQ-hy9HTk; How to Connect Xiaomi Mi 360 Home Security Camera with Mi Home Application - Complete Guide.



See https://www.youtube.com/watch?v=mLHMRxZED-A; How to Set Up and Pair Xiaomi Purifier 4 PRO with App.

Specifications

Name: xiaomi Smart Air Purifier 4 Compact
Model: AC-M18-SC
Item Dimensions: Φ220 × H355 mm
Net Weight: Approx. 2.2 kg
Effective Coverage: 16–27 m^2*
Rated Voltage: 24 V ⎓
Power Adapter Rated Input:
100–240 V~, 50/60 Hz
Rated Power: 27 W
Noise Level: ≤60 dB(A)
*Calculated according to standard GB/T 18801–2015

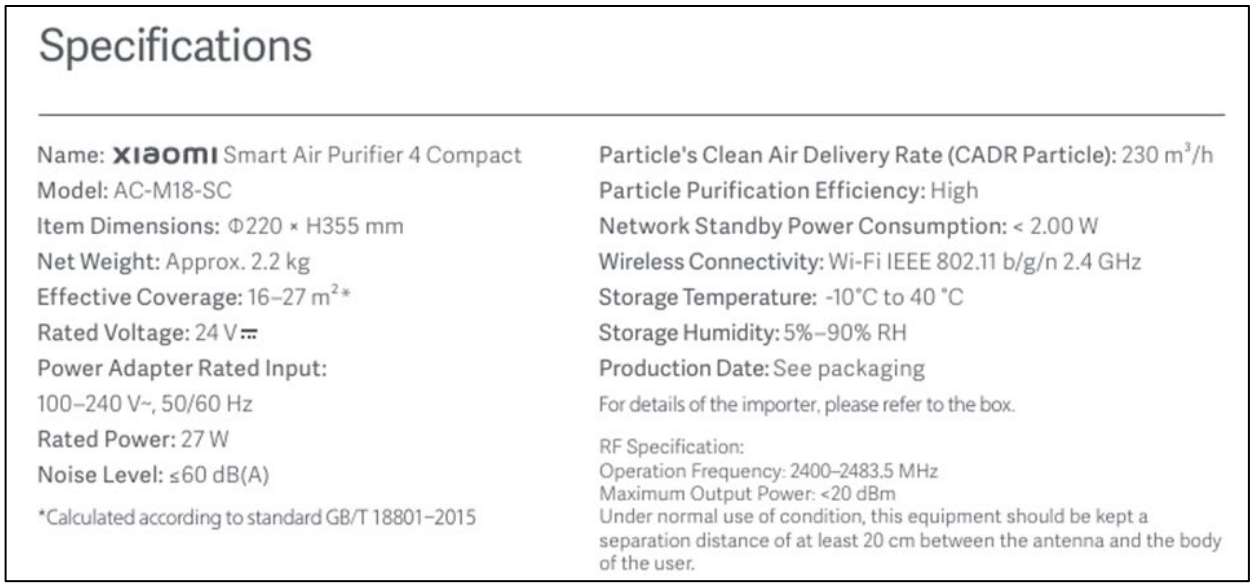
Particle's Clean Air Delivery Rate (CADR Particle): 230 m^3/h
Particle Purification Efficiency: High
Network Standby Power Consumption: < 2.00 W
Wireless Connectivity: Wi-Fi IEEE 802.11 b/g/n 2.4 GHz
Storage Temperature: -10°C to 40 °C
Storage Humidity: 5%–90% RH
Production Date: See packaging
For details of the importer, please refer to the box.

RF Specification:
Operation Frequency: 2400–2483.5 MHz
Maximum Output Power: <20 dBm
Under normal use of condition, this equipment should be kept a separation distance of at least 20 cm between the antenna and the body of the user.

See

https://manuals.plus/m/114c62b5473dac1ce95223665a041db7facd11f34d0c9b786b89f89279713bf1_optim.pdf; Xiaomi Smart Air Purifier 4 Compact User Manual.

59. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein the unique identifier is associated (*e.g.*, Serial number, UID, name given by the user such as Kid's room, etc.) with the phone identifier (*e.g.*, user's phone number) for the user's mobile phone.



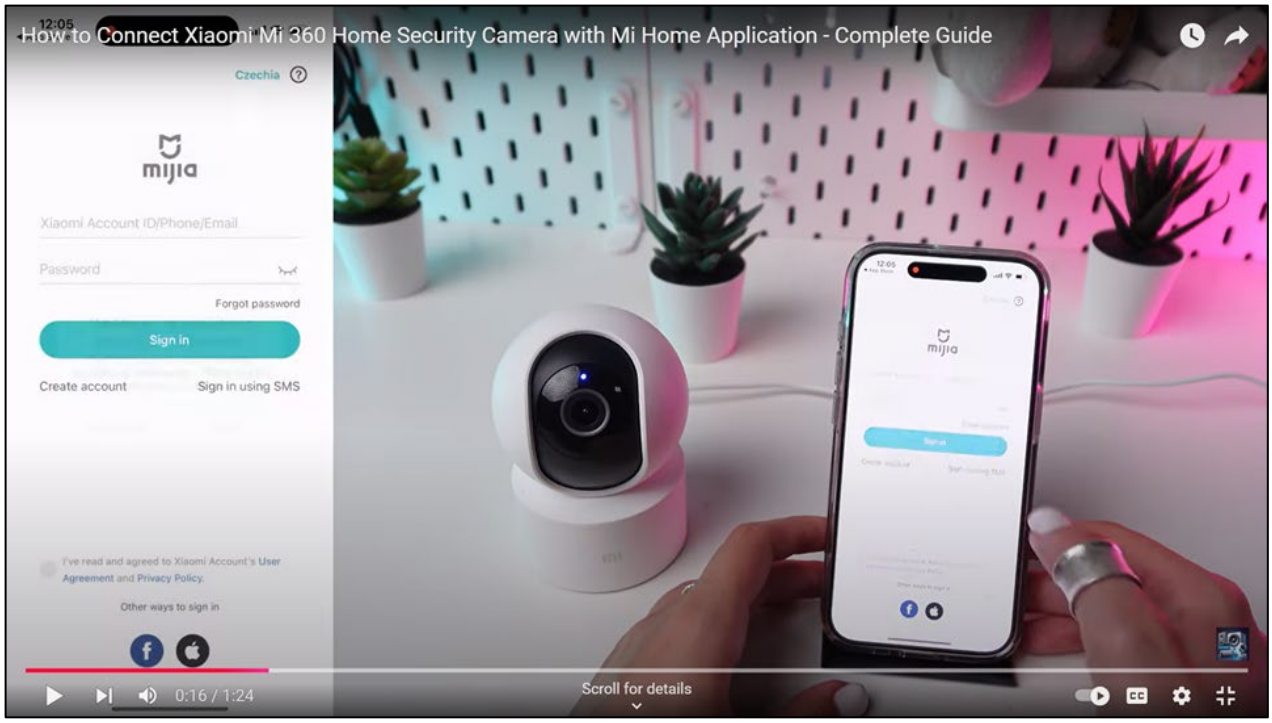
Specifications

Name: xiaomi Smart Air Purifier 4 Compact
Model: AC-M18-SC
Item Dimensions: Φ220 × H355 mm
Net Weight: Approx. 2.2 kg
Effective Coverage: 16–27 m^2*
Rated Voltage: 24 V ⎓
Power Adapter Rated Input:
100–240 V~, 50/60 Hz
Rated Power: 27 W
Noise Level: ≤60 dB(A)
*Calculated according to standard GB/T 18801–2015

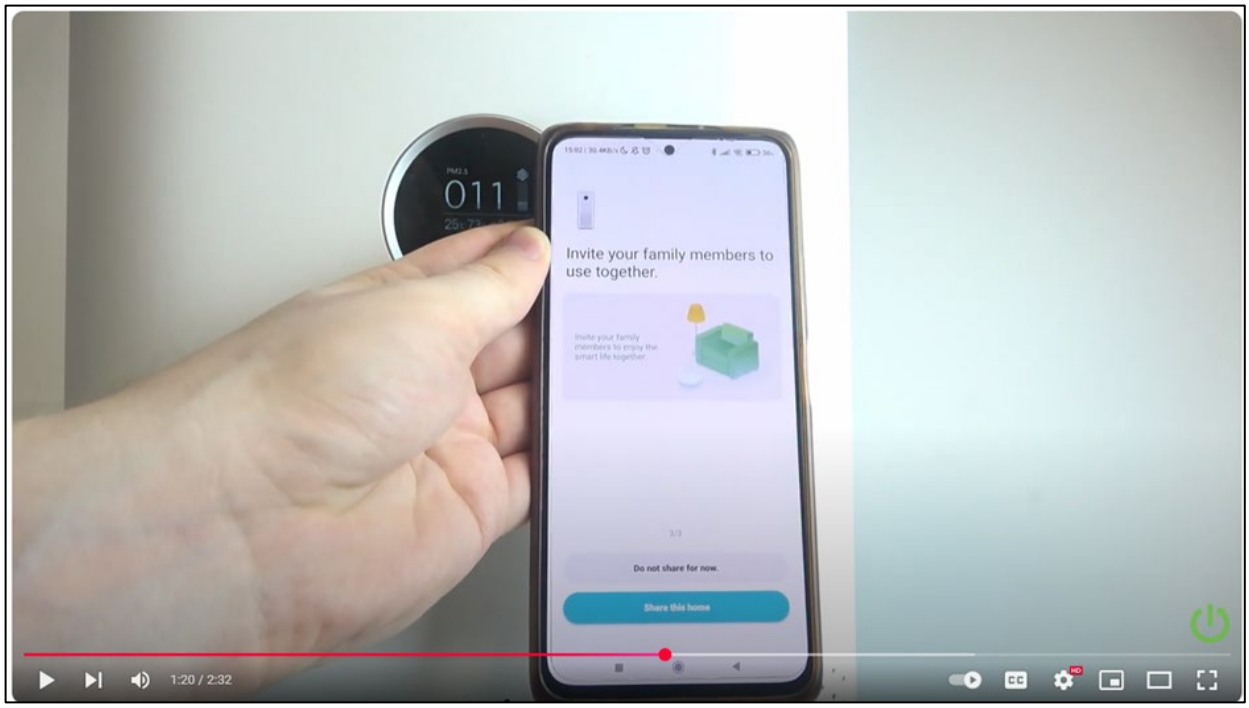
Particle's Clean Air Delivery Rate (CADR Particle): 230 m^3/h
Particle Purification Efficiency: High
Network Standby Power Consumption: < 2.00 W
Wireless Connectivity: Wi-Fi IEEE 802.11 b/g/n 2.4 GHz
Storage Temperature: -10°C to 40 °C
Storage Humidity: 5%–90% RH
Production Date: See packaging
For details of the importer, please refer to the box.

RF Specification:
Operation Frequency: 2400–2483.5 MHz
Maximum Output Power: <20 dBm
Under normal use of condition, this equipment should be kept a separation distance of at least 20 cm between the antenna and the body of the user.

See https://manuals.plus/m/114c62b5473dac1ce95223665a041db7facd11f34d0c9b786b89f89279713bf1_optim.pdf; Xiaomi Smart Air Purifier 4 Compact User Manual.

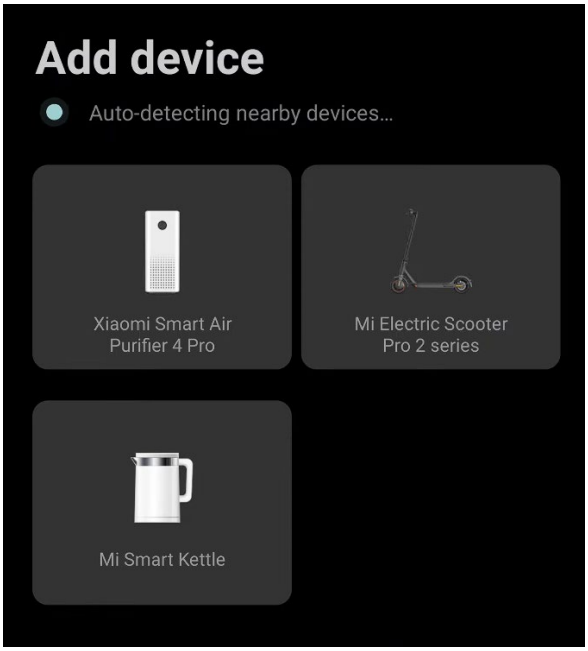


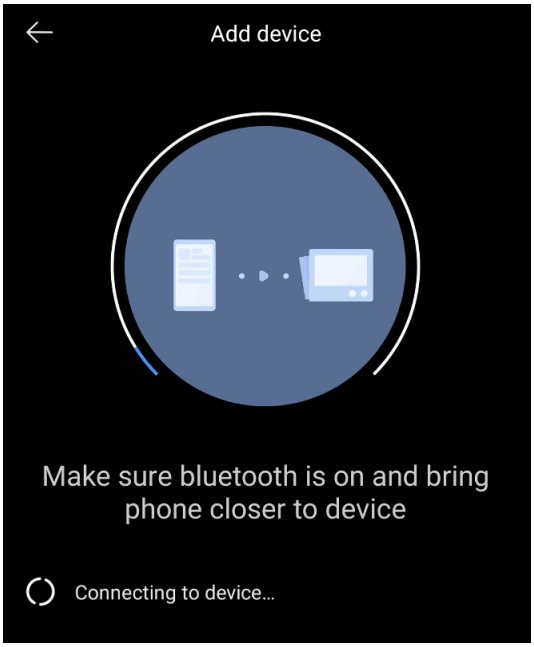
See https://www.youtube.com/watch?v=pNJQ-hy9HTk; How to Connect Xiaomi Mi 360 Home Security Camera with Mi Home Application - Complete Guide.

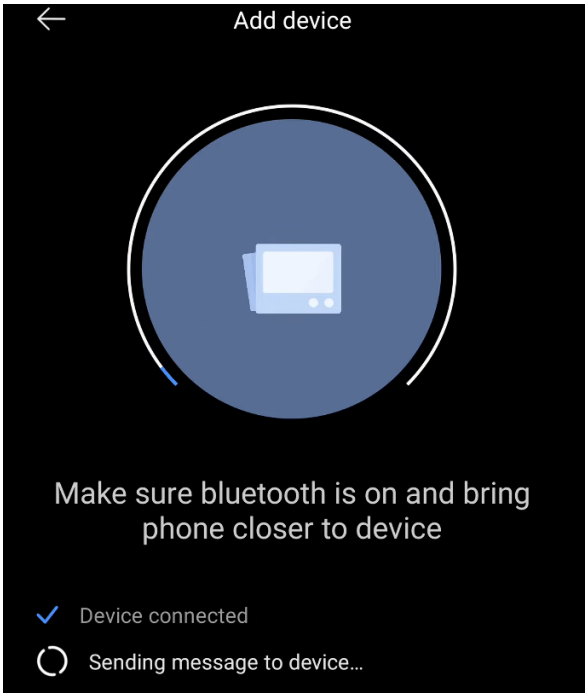


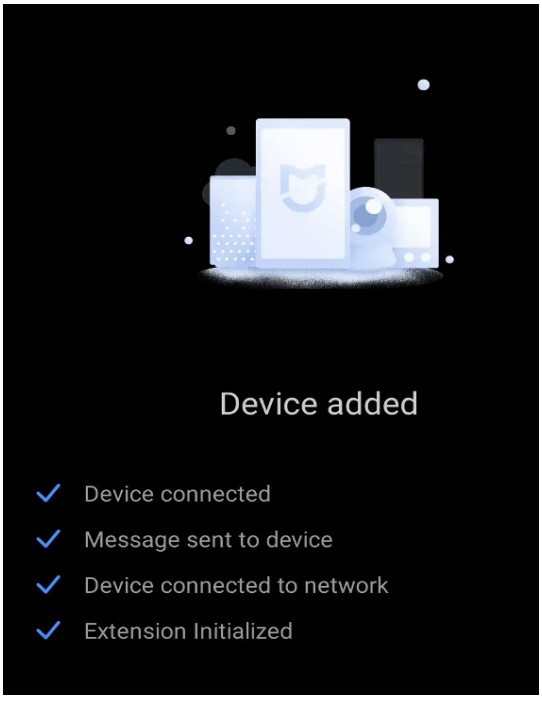
See https://www.youtube.com/watch?v=mLHMRxZED-A; How to Set Up and Pair Xiaomi Purifier 4 PRO with App.

60. On information and belief, one or more components of the Xiaomi Products and Services provides a wireless device associated with a unique identifier comprising wherein a configured data package comprises information for the network address (*e.g.*, IP address) for the WiFi network, the configured data package being from a cellular phone in initiating communications that are directed to the wireless device (Xiaomi Smart Air Purifier 4 Compact).

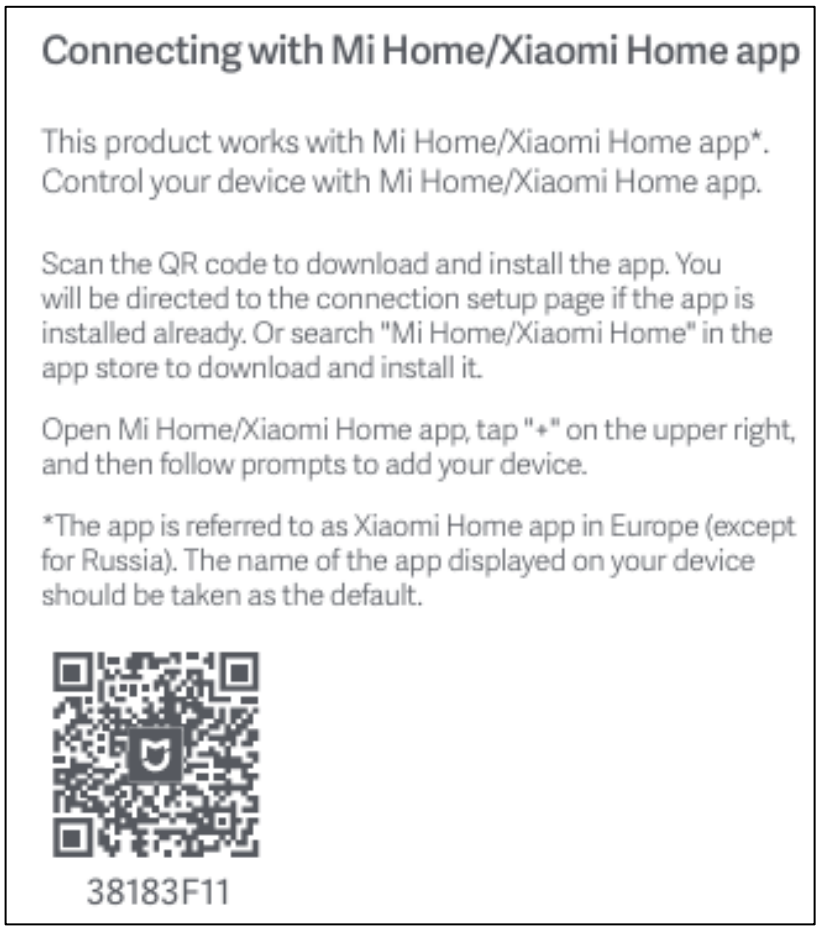






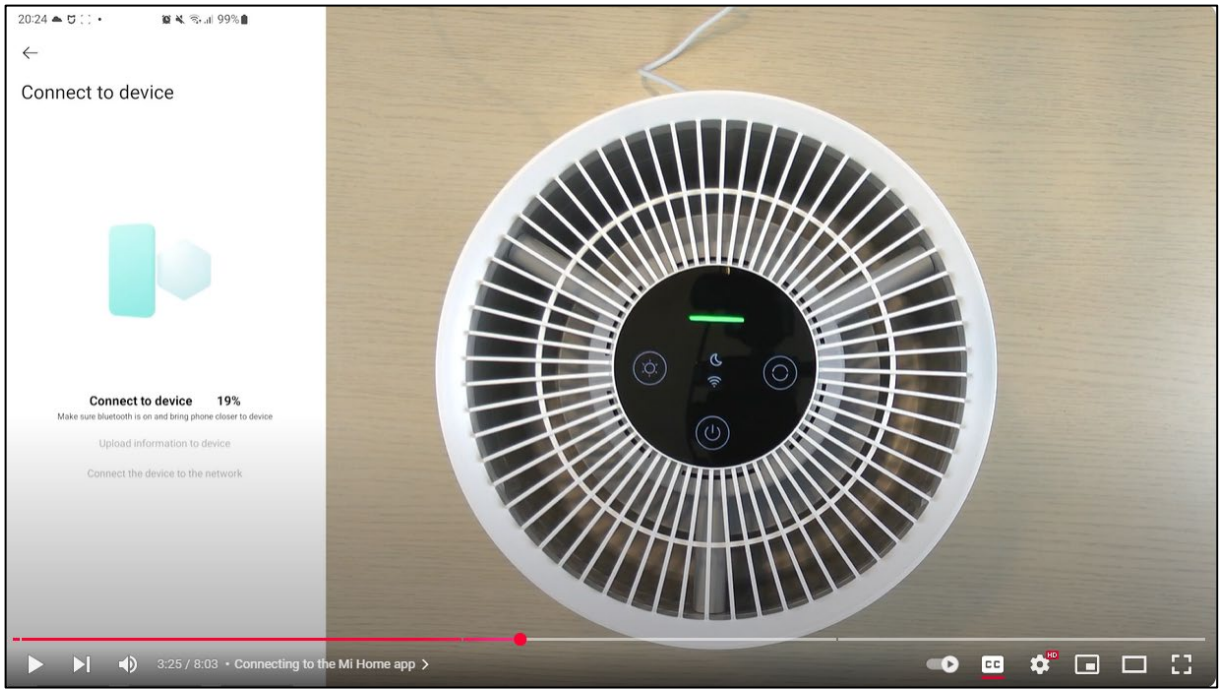


See https://www.youtube.com/watch?v=RGvc9If2K9w; How to setup Mi Smart Air Purifier 4 Pro with Mi Home app - YouTube.



See

https://manuals.plus/m/114c62b5473dac1ce95223665a041db7facd11f34d0c9b786b89f89279713bf1_optim.pdf; Xiaomi Smart Air Purifier 4 Compact User Manual.



See https://www.youtube.com/watch?v=NjG027___OQ; Xiaomi Smart Air Purifier 4 Compact | Unboxing & Setup | MI Home | Google Home.

Specifications

Name: xiaomi Smart Air Purifier 4 Compact
Model: AC-M18-SC
Item Dimensions: Φ220 × H355 mm
Net Weight: Approx. 2.2 kg
Effective Coverage: 16–27 m^2*
Rated Voltage: 24 V ⎓
Power Adapter Rated Input:
100–240 V~, 50/60 Hz
Rated Power: 27 W
Noise Level: ≤60 dB(A)
*Calculated according to standard GB/T 18801–2015

Particle's Clean Air Delivery Rate (CADR Particle): 230 m^3/h
Particle Purification Efficiency: High
Network Standby Power Consumption: < 2.00 W
Wireless Connectivity: Wi-Fi IEEE 802.11 b/g/n 2.4 GHz
Storage Temperature: -10°C to 40 °C
Storage Humidity: 5%–90% RH
Production Date: See packaging
For details of the importer, please refer to the box.

RF Specification:
Operation Frequency: 2400–2483.5 MHz
Maximum Output Power: <20 dBm
Under normal use of condition, this equipment should be kept a separation distance of at least 20 cm between the antenna and the body of the user.

See https://manuals.plus/m/114c62b5473dac1ce95223665a041db7facd11f34d0c9b786b89f89279713bf1_optim.pdf; Xiaomi Smart Air Purifier 4 Compact User Manual.

61. On information and belief, Xiaomi directly infringes at least claim 1 of the ’179 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Xiaomi Products and Services.

62. Innovation Sciences has been damaged by Defendants’ infringement and has caused / continues to cause it to suffer irreparable harm and damages as a result of the infringement

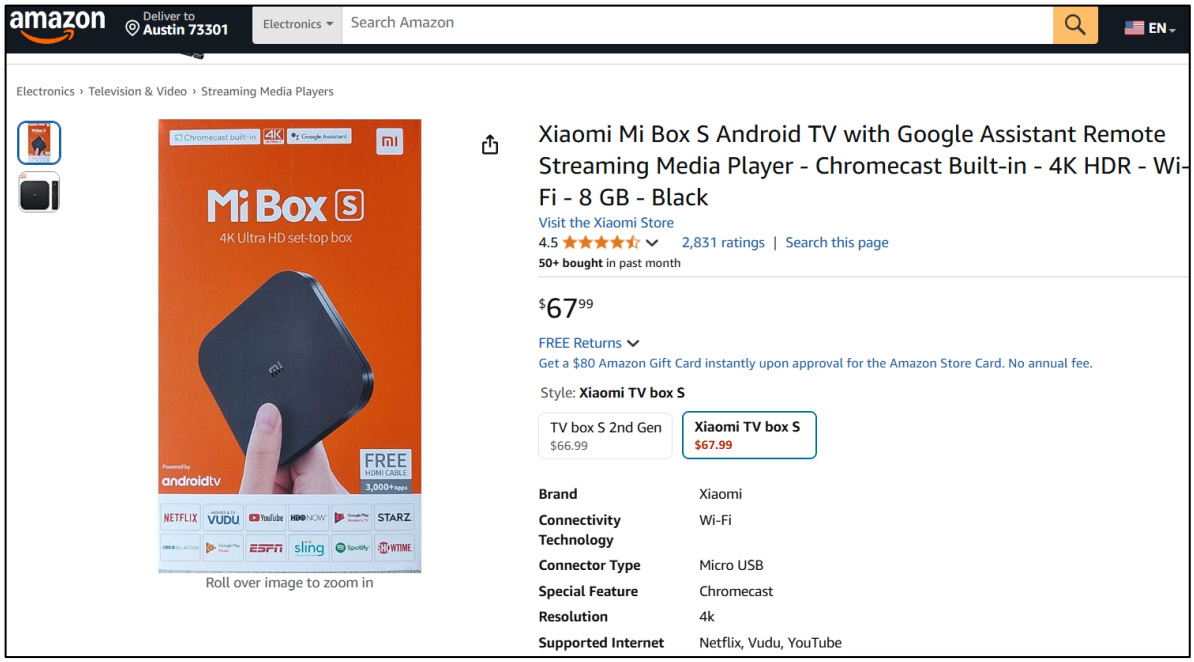
Count III – Infringement of United States Patent No. 10,368,125

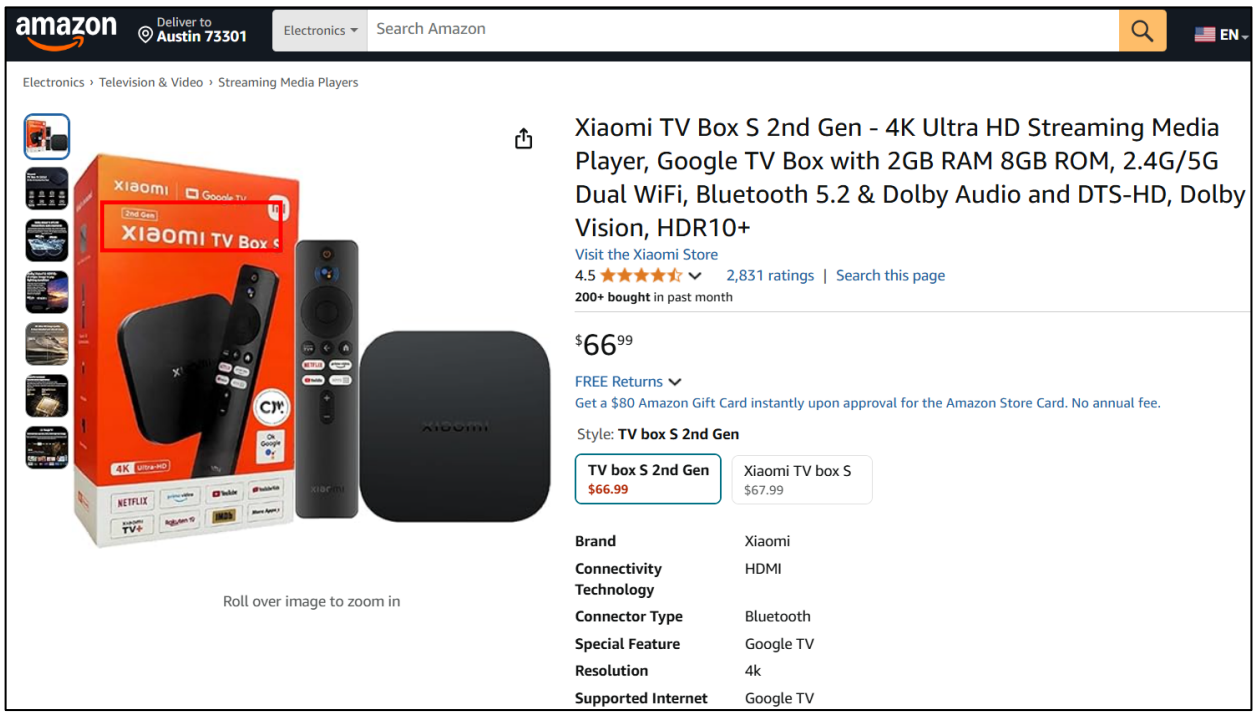
63. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

64. On information and belief, Xiaomi violated 35 U.S. C. § 271(a) with respect to one or more claims of the ’125 patent.

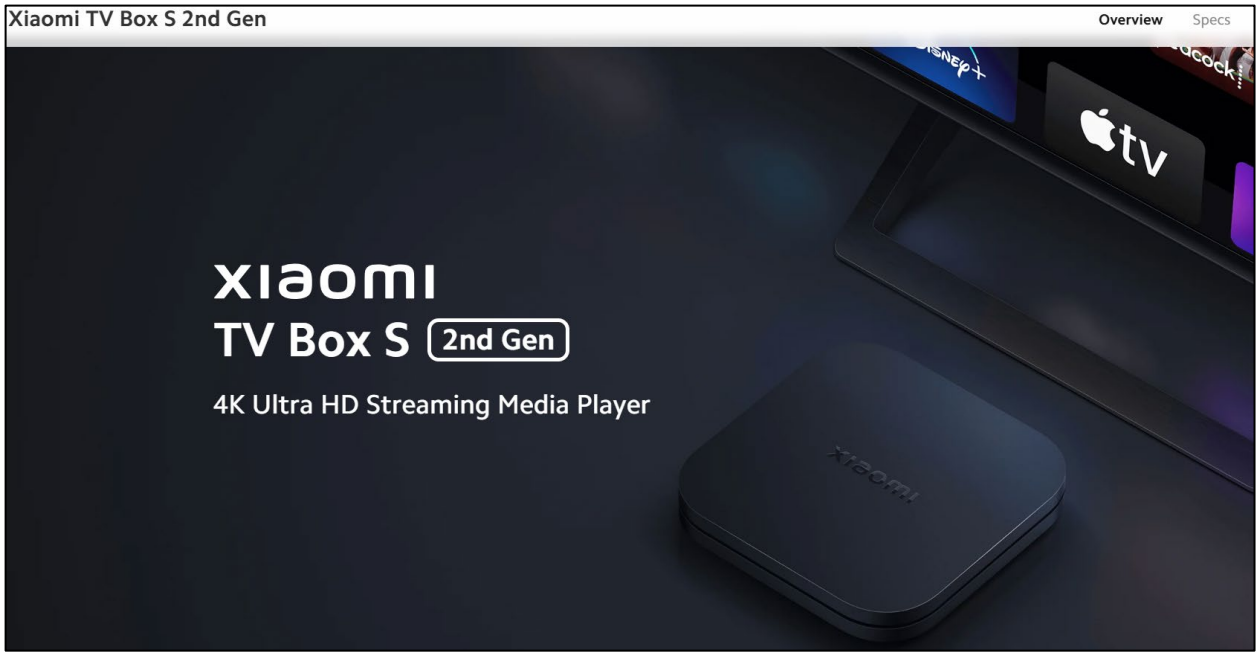
65. On information and belief, Xiaomi (or those acting on its behalf) (i) makes, uses, sells, sells access to, imports, offers to sell and/or offers to sell access to the Xiaomi Products and Services in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 47 of ’125 patent.

66. On information and belief, one or more components of the Xiaomi Products and Services (*e.g.*, Xiaomi TV Box) provides an intelligent wireless HUB system with a device identifier (*e.g.*, Serial number, Device ID, name given by the user, etc. of the Xiaomi TV box) for communications of various information.

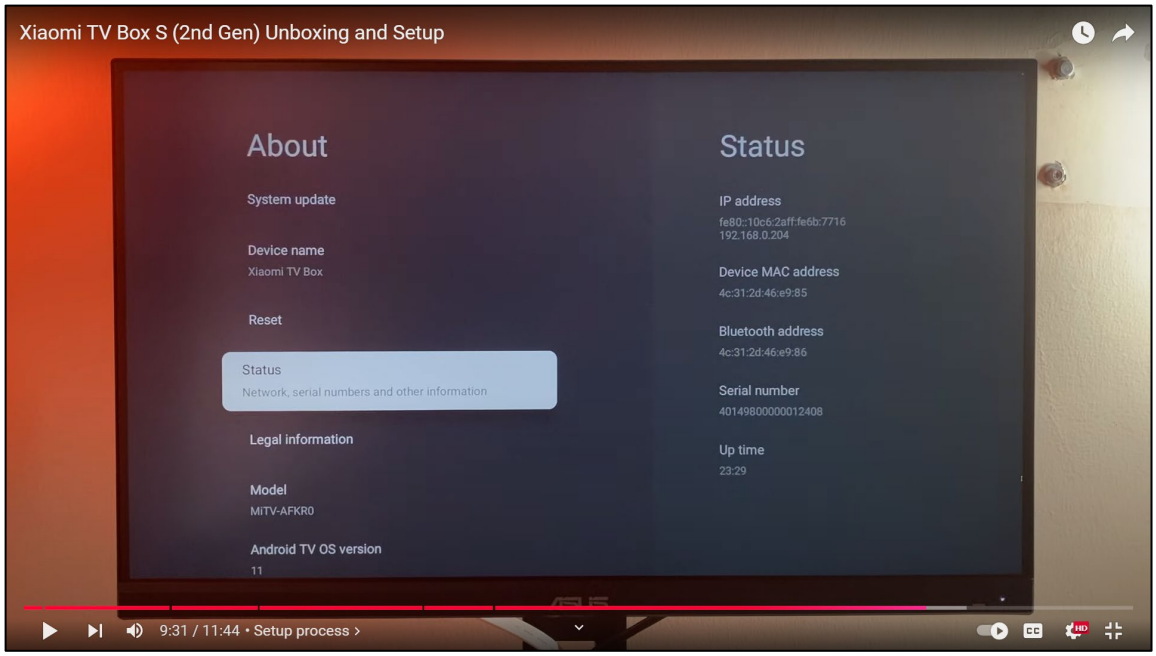




See https://www.amazon.com/Xiaomi-Android-Google-Assistant-Streaming/dp/B0CHWRX597?th=1.



See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



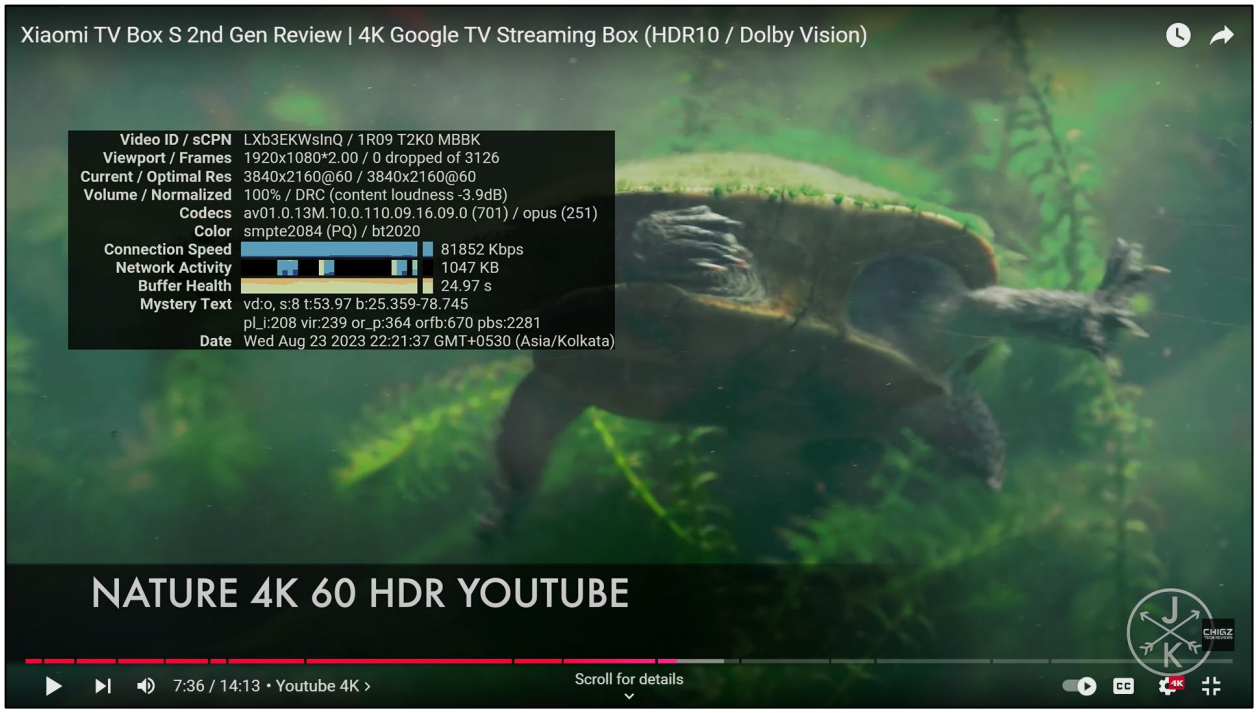
See https://www.youtube.com/watch?v=GfLB1-fwGro.

67. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of various information comprising a wireless signal conversion unit (*e.g.*, codec) including a decoder.

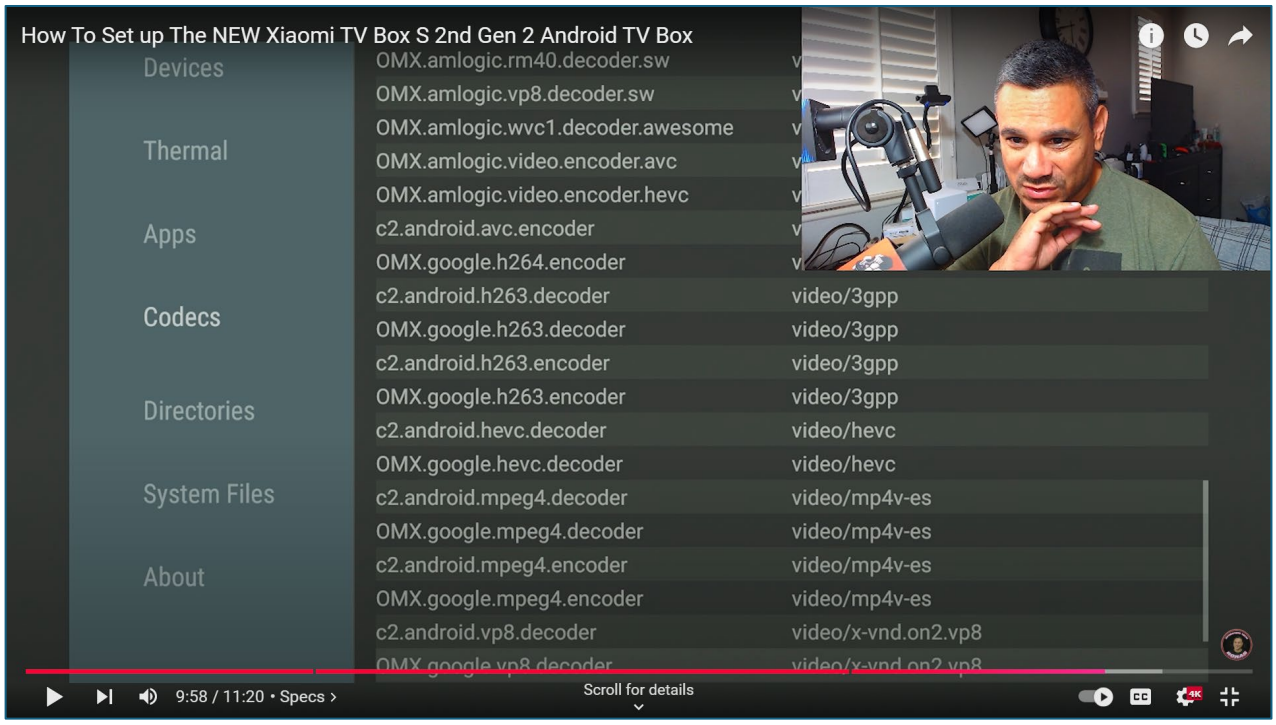
Xiaomi TV Box S 2nd Gen

Wireless connectivity	Wi-Fi:	2.4GHz/ 5GHz
	Bluetooth:	5.2
Decoder	Video decoder:	Up to 4K 60FPS Supports Dolby Audio® and DTS-HD Supports Dolby Vision® Supports HDR10+
	Support language:	Global

See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



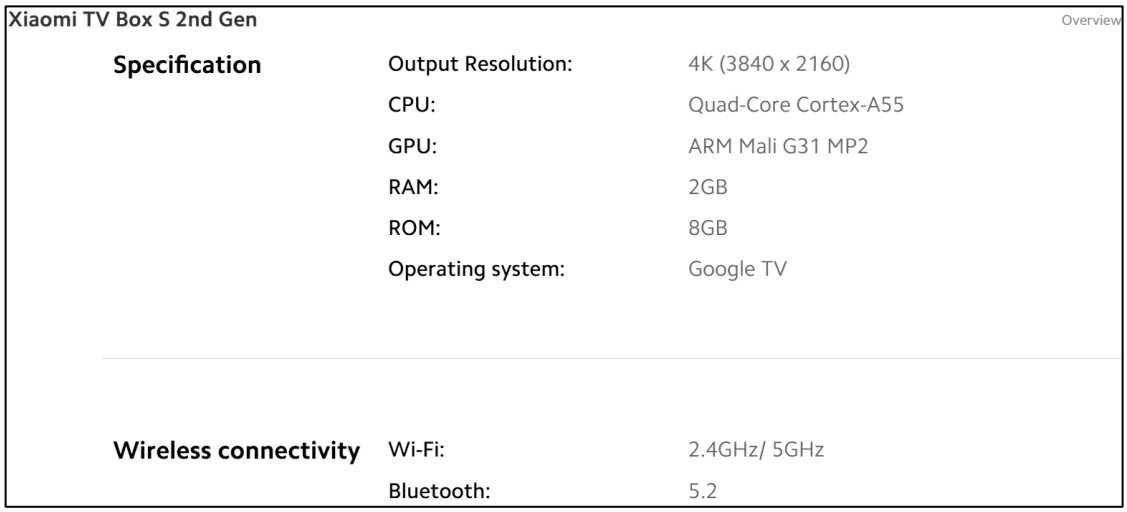
See https://www.youtube.com/watch?v=ht97YiL86o0.



See https://www.youtube.com/watch?v=ul3XvLzMGww.

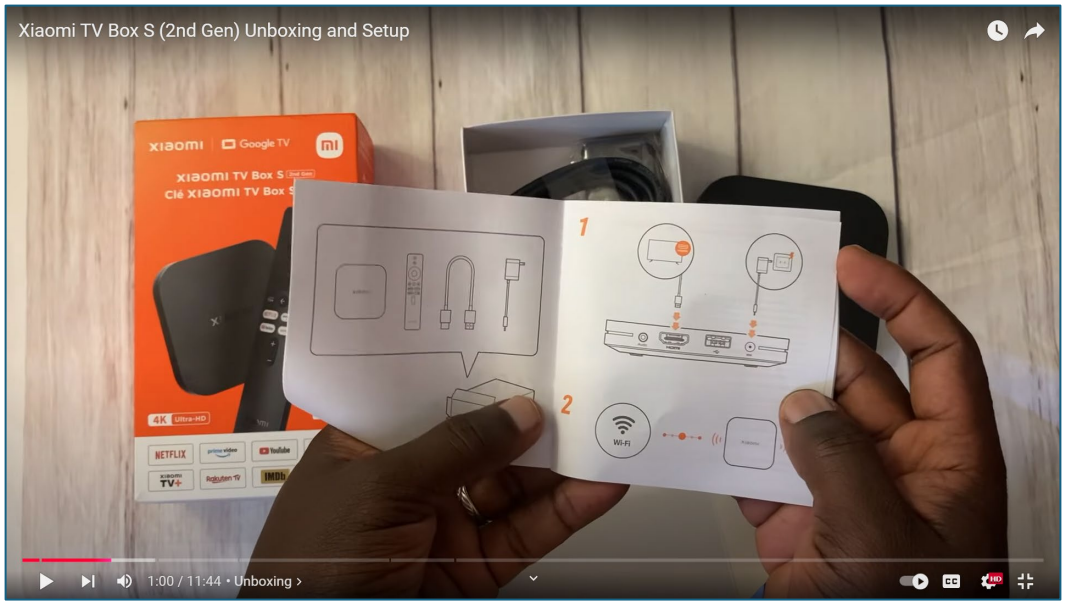
68. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of

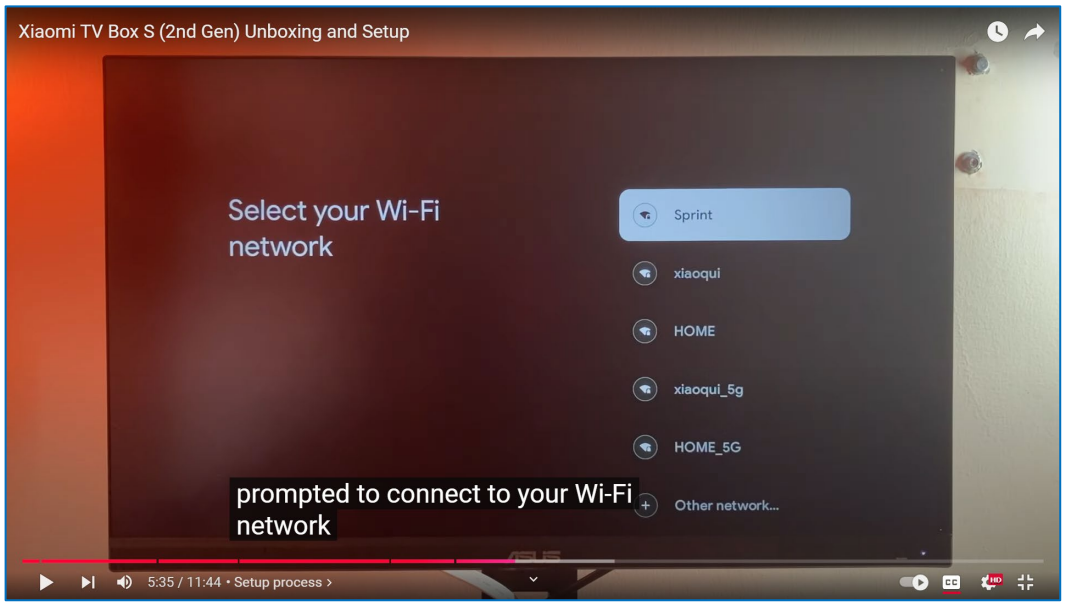
various information comprising a network interface (*e.g.*, Wi-Fi interface) configured to provide a communication through a network communication channel of a wireless local area network (*e.g.*, Wi-Fi network).

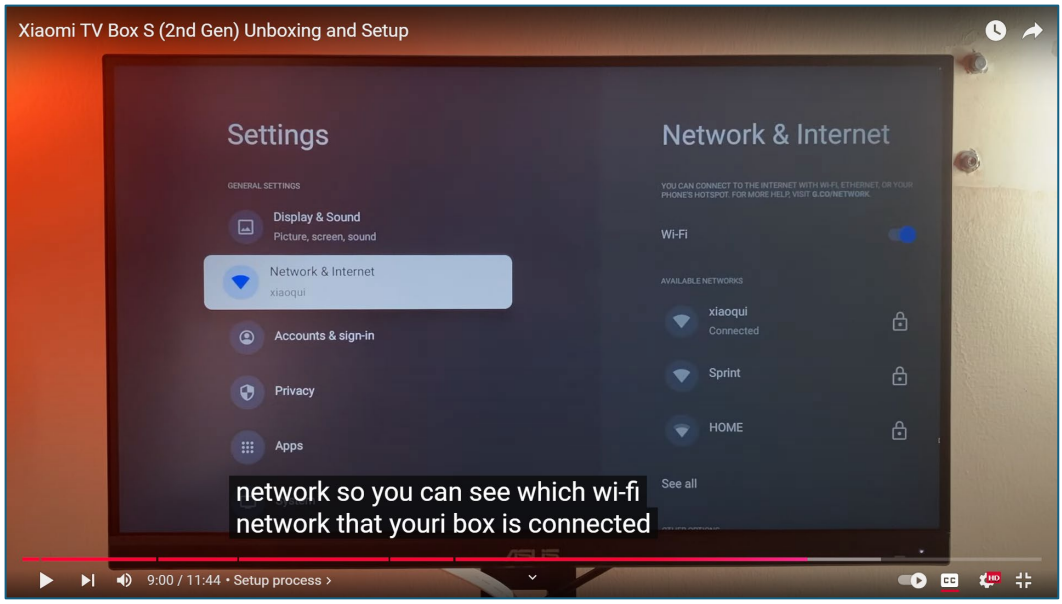


See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.

See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.

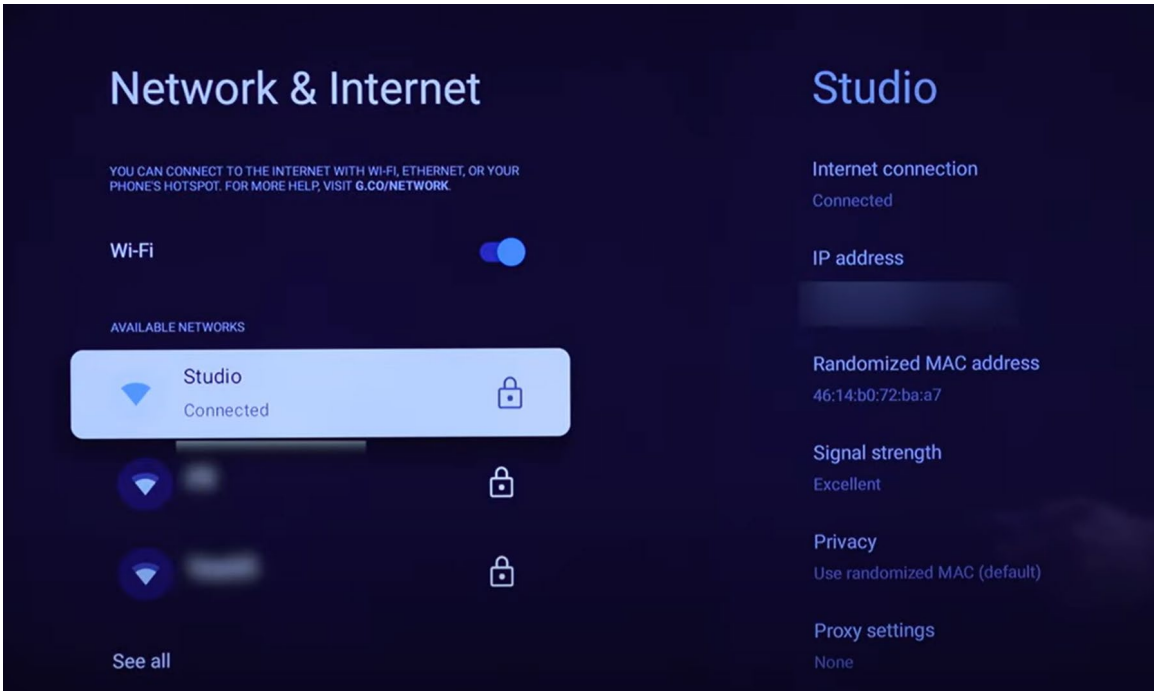

Xiaomi TV Box S (2nd Gen) Unboxing and Setup
xiaomi
Google TV
xiaomi TV Box S
1
2
4K Ultra-HD
NETFLIX
1:00 / 11:44 • Unboxing ›


Xiaomi TV Box S (2nd Gen) Unboxing and Setup
Select your Wi-Fi network
Sprint
xiaoqui
HOME
xiaoqui_5g
HOME_5G
Other network...
prompted to connect to your Wi-Fi network
5:35 / 11:44 • Setup process ›



See https://www.youtube.com/watch?v=GfLB1-fwGro.

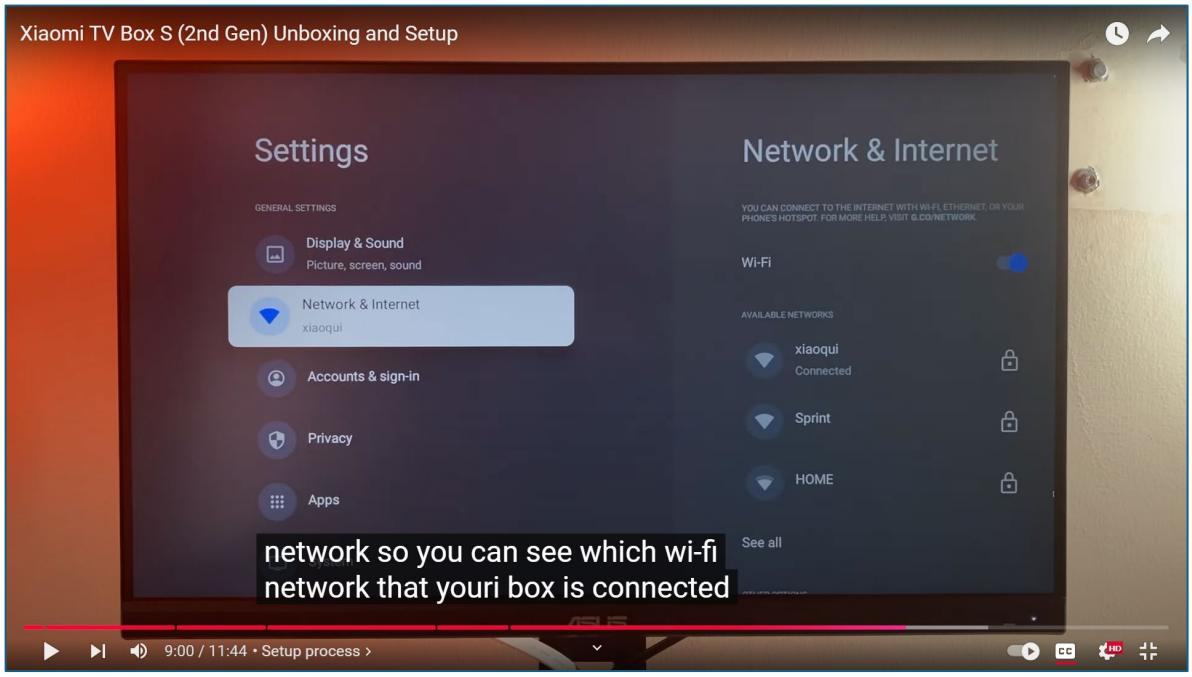
69. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of various information comprising a configuration application configured to provide configured data (*e.g.,* IP address, Bluetooth address, Device ID, etc.) in initiating communications (*e.g.*, communication with Xiaomi/Mi server) that are directed to the intelligent wireless HUB system (*e.g.*, Xiaomi TV Box), the configured data comprising information corresponding to a network address (*e.g.*, IP address) associated with the wireless local area and information corresponding to the device identifier (*e.g.*, Serial number, Device ID, name given by the user, etc. of the Xiaomi TV box), the network address associated with the wireless local area network stored in association with the device identifier.

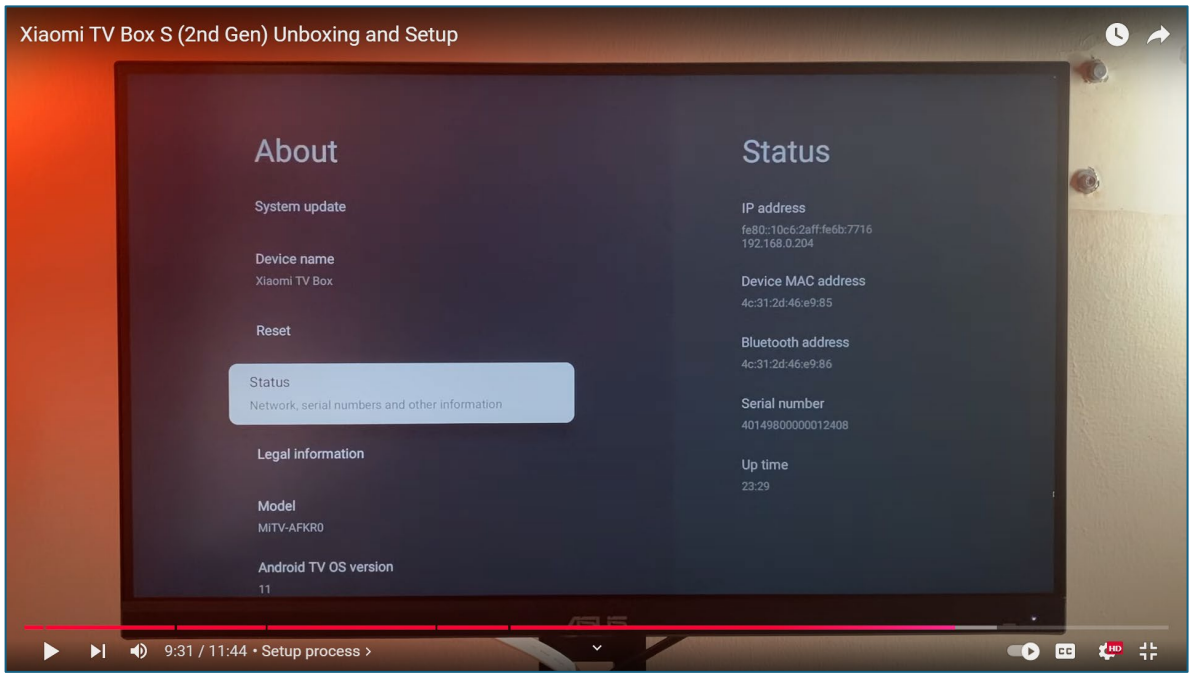


See

https://www.youtube.com/watch?v=4xjLd7M3BA4&list=PL0vzxv5F0VaP1aeh_uaVcSfJGjbfTpEQB;

Xiaomi TV Box 4K: How To Setup Properly! [Install For First Time Use].

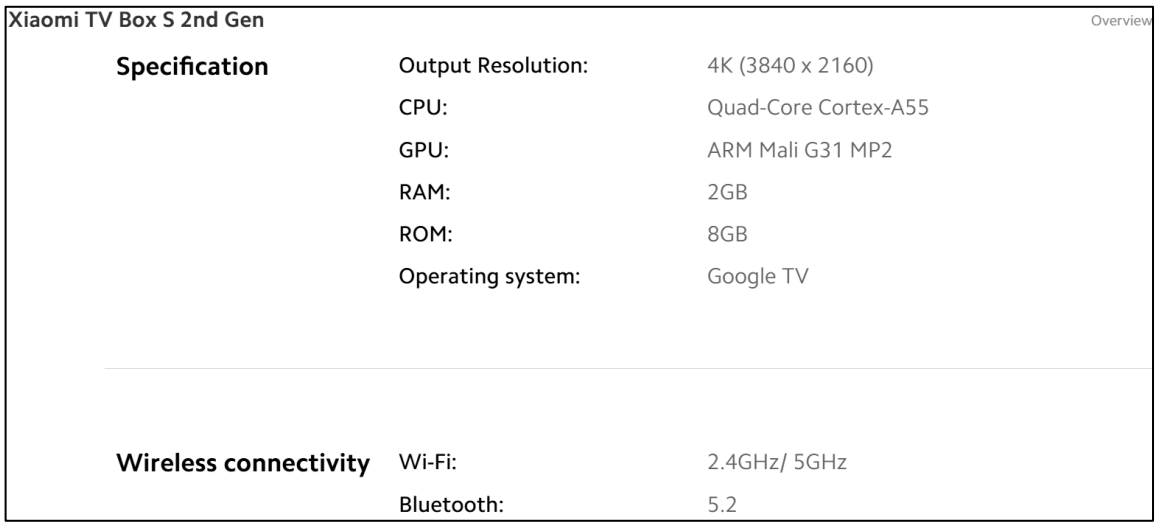




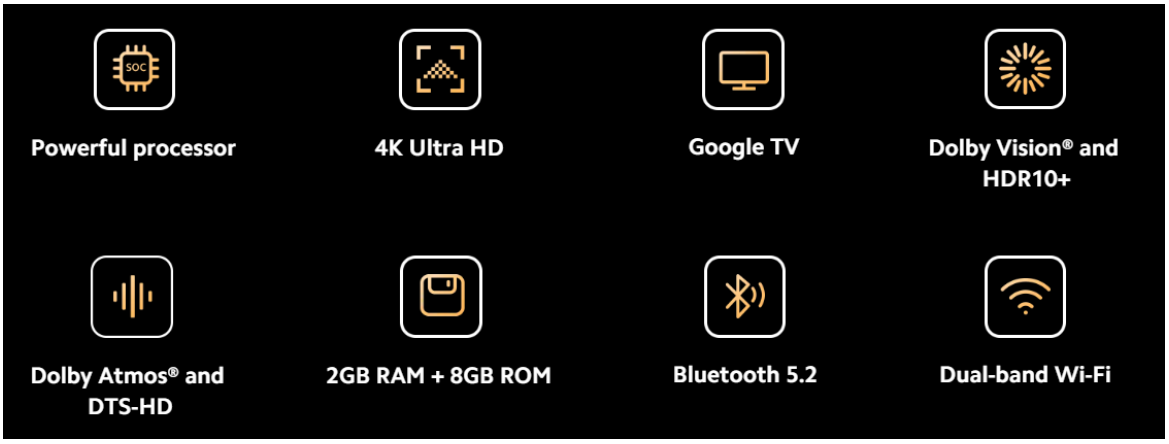
See https://www.youtube.com/watch?v=GfLB1-fwGro.

70. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of various information comprising wherein the intelligent wireless HUB system (*e.g.*, Xiaomi TV Box) is configured to receive a wireless signal through the network communication channel (*e.g.*, Wi-Fi). On

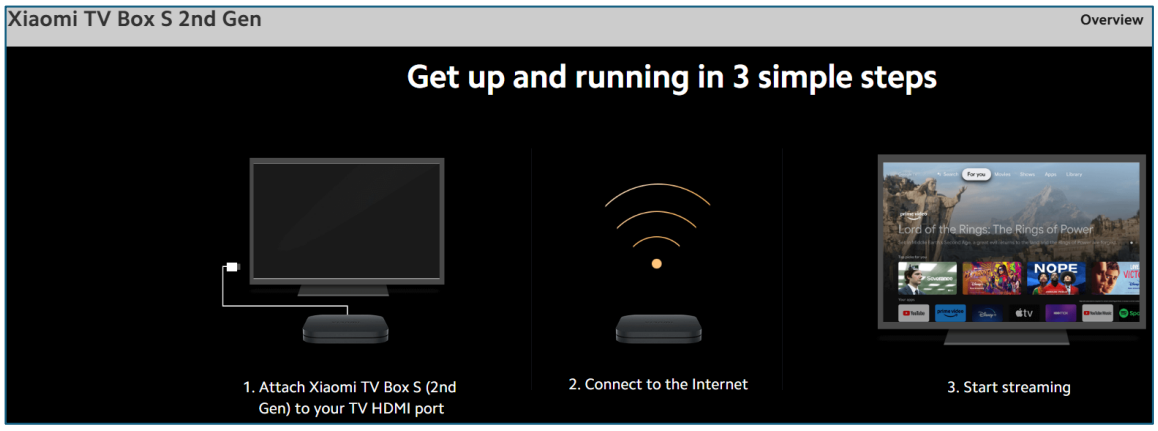
information and belief and as shown below, the Xiaomi TV Box includes a Dual Band Wi-Fi (2.4GHz/5GHz) used to stream video content on a television.



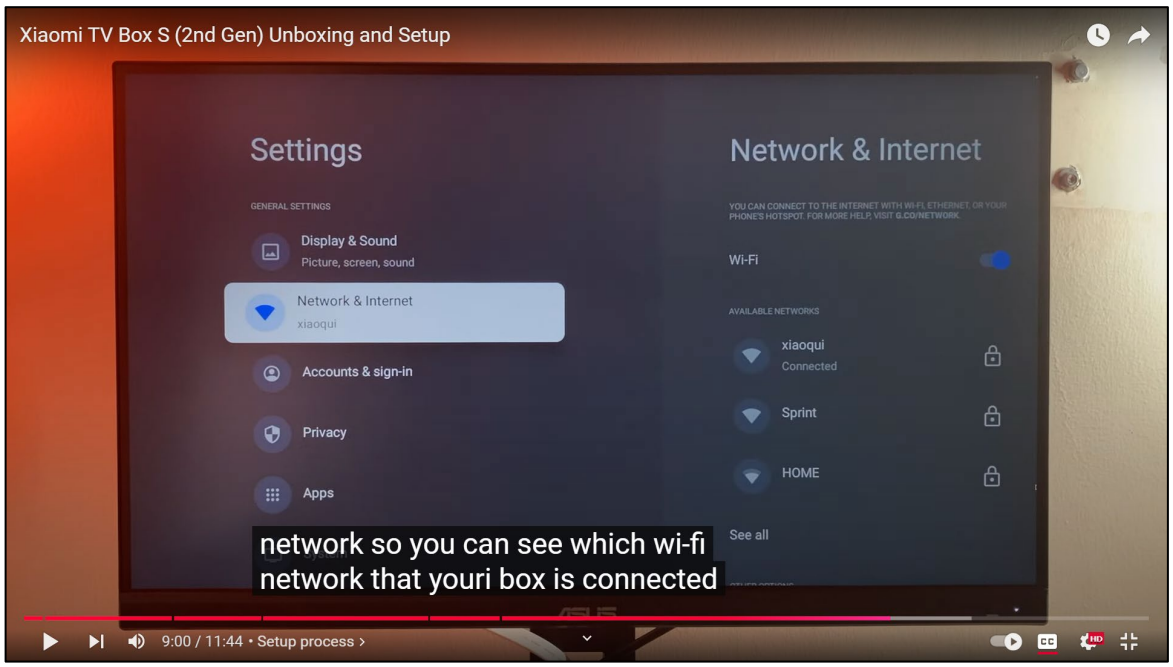
See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



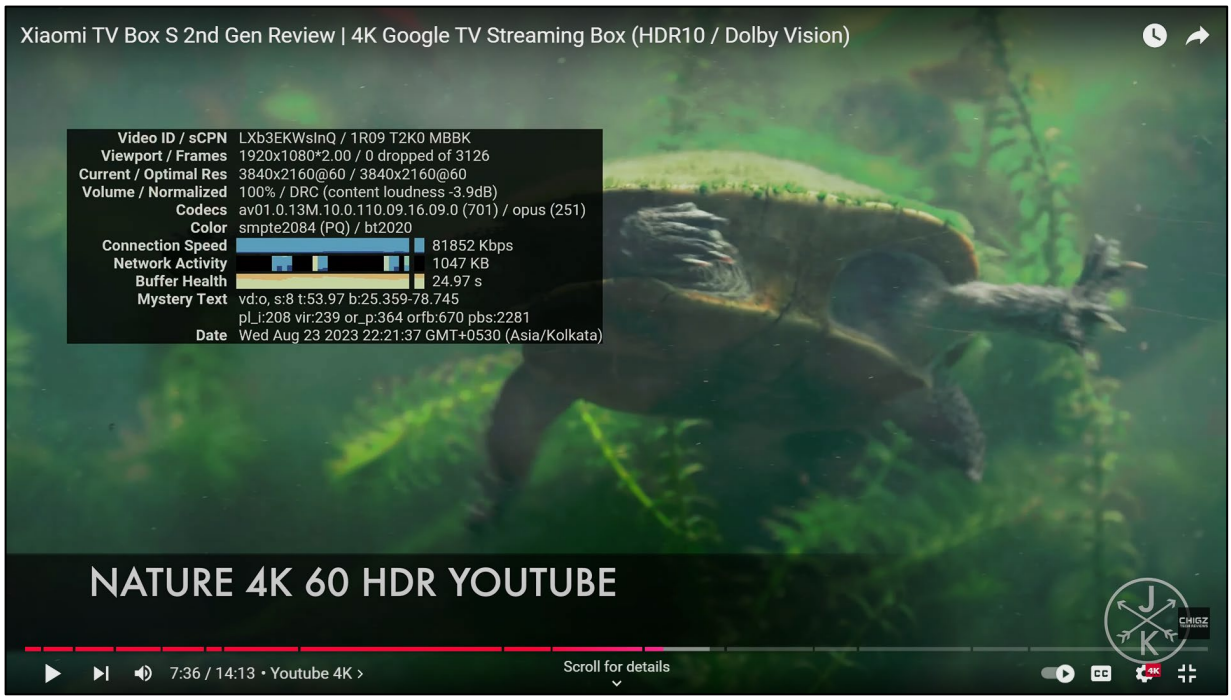
See https://www.mi.com/global/product/xiaomi-tv-box-s-2nd-gen/specs.



See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



See https://www.youtube.com/watch?v=GfLB1-fwGro.



See https://www.youtube.com/watch?v=ht97YiL86o0.

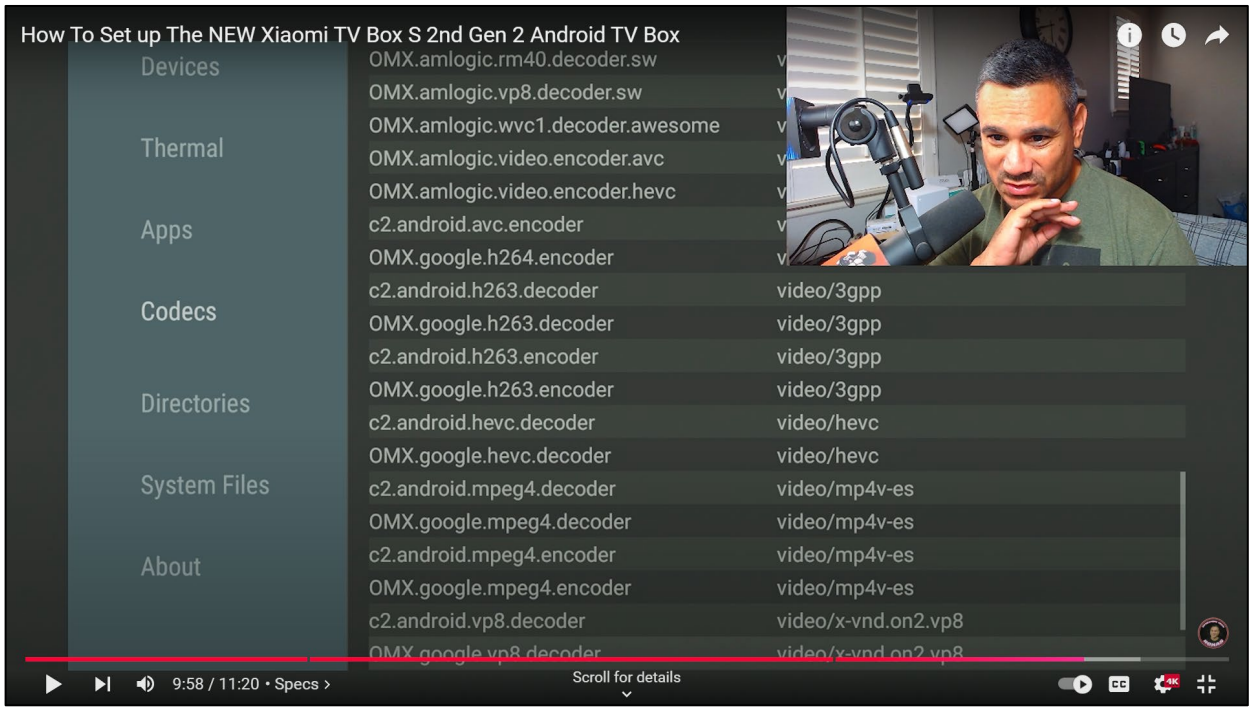
71. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of

various information comprising wherein the wireless signal conversion unit (*e.g.*, codec) is configured to perform a conversion of the wireless signal to accommodate production of a corresponding information content (*e.g.*, the streamed video content), the wireless signal comprising a compressed signal (*e.g.*, HEVC, H.264, MPEG-4, etc.), the conversion comprising decompressing the compressed signal.

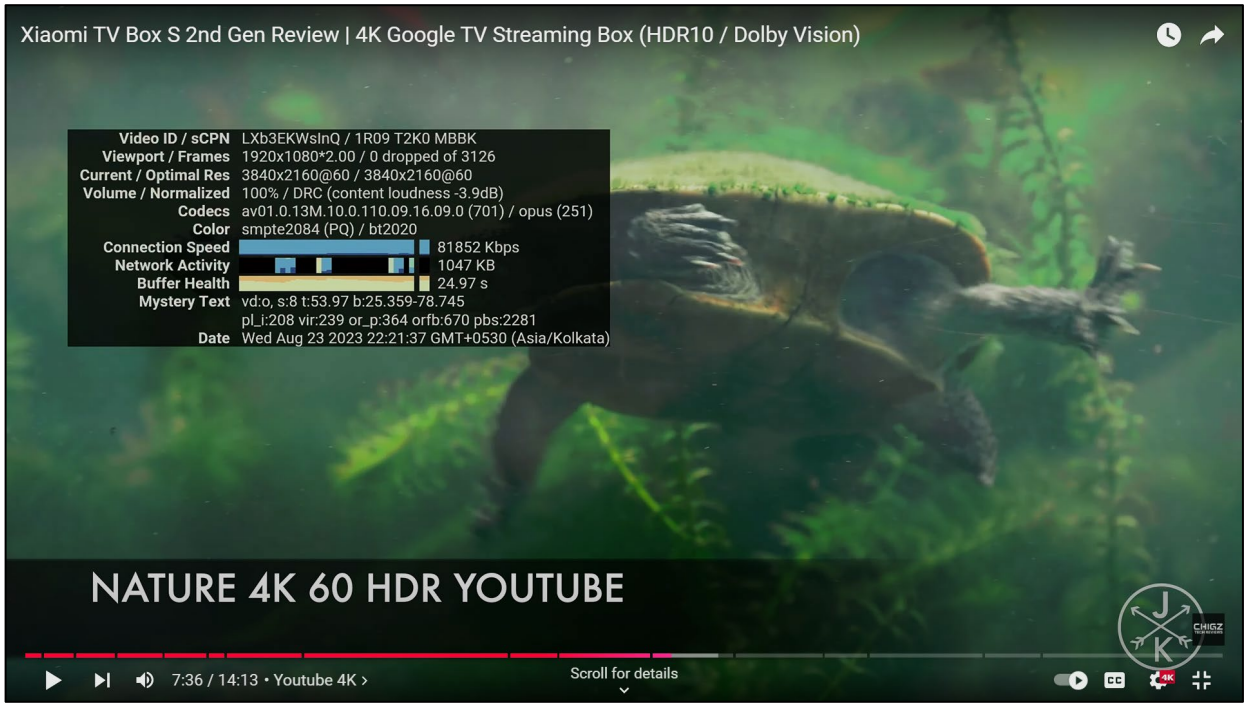
Xiaomi TV Box S 2nd Gen

Wireless connectivity	Wi-Fi:	2.4GHz/ 5GHz
	Bluetooth:	5.2
Decoder	Video decoder:	Up to 4K 60FPS
		Supports Dolby Audio® and DTS-HD
		Supports Dolby Vision®
		Supports HDR10+
	Support language:	Global

See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



See https://www.youtube.com/watch?v=ul3XvLzMGww.

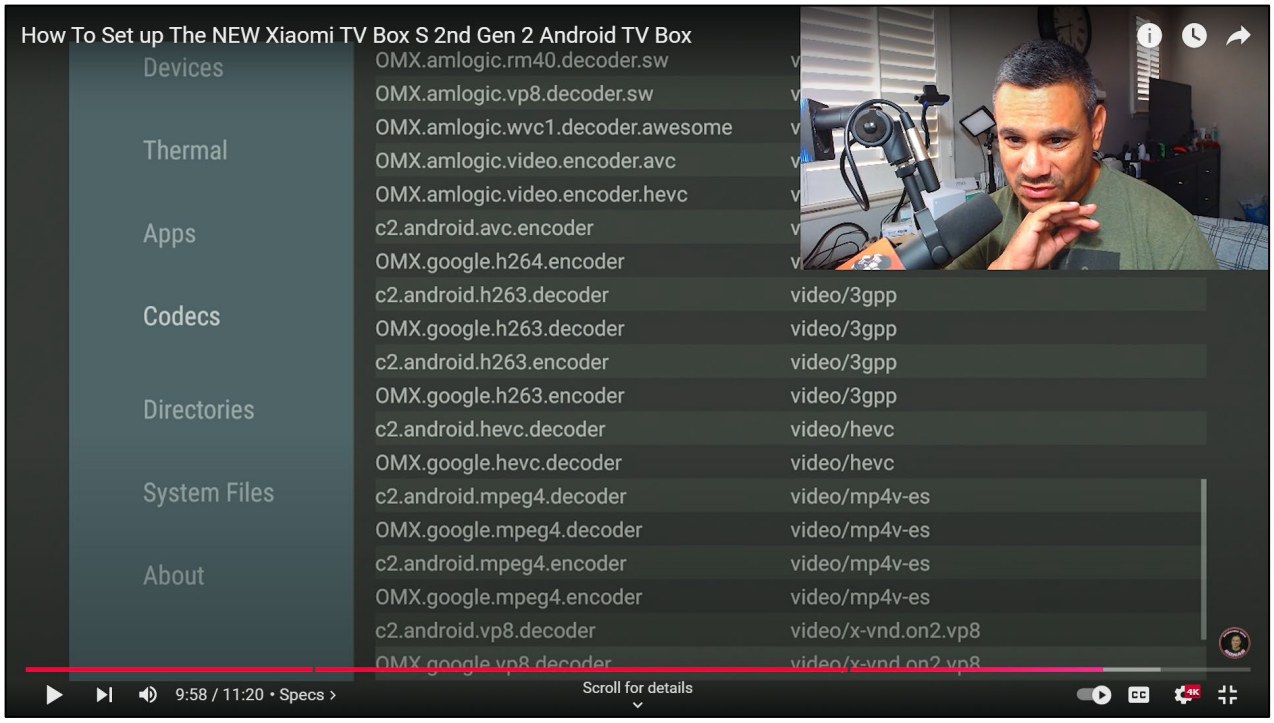


See https://www.youtube.com/watch?v=ht97YiL86o0.

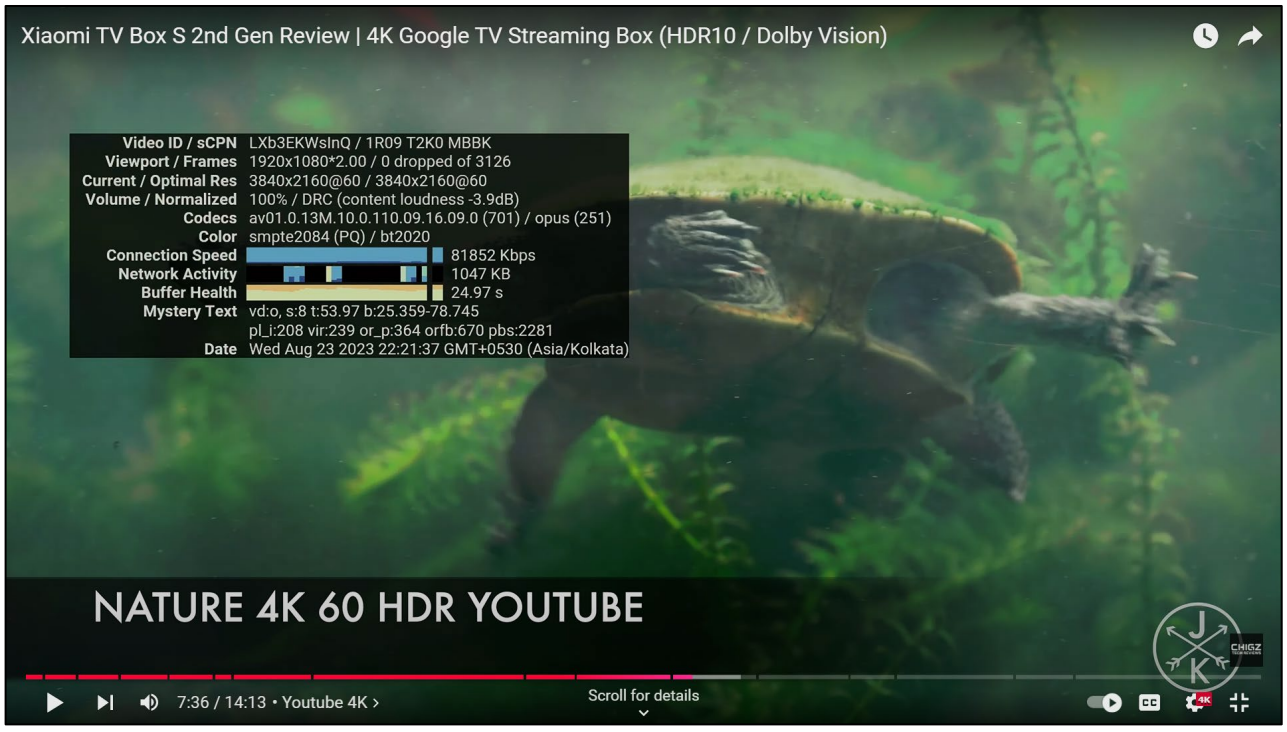
72. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of various information comprising wherein the decoder is configured to decompress the compressed signal.

Decoder	Video decoder:	Up to 4K 60FPS Supports Dolby Audio® and DTS-HD Supports Dolby Vision® Supports HDR10+
	Support language:	Global

See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



See https://www.youtube.com/watch?v=ul3XvLzMGww.

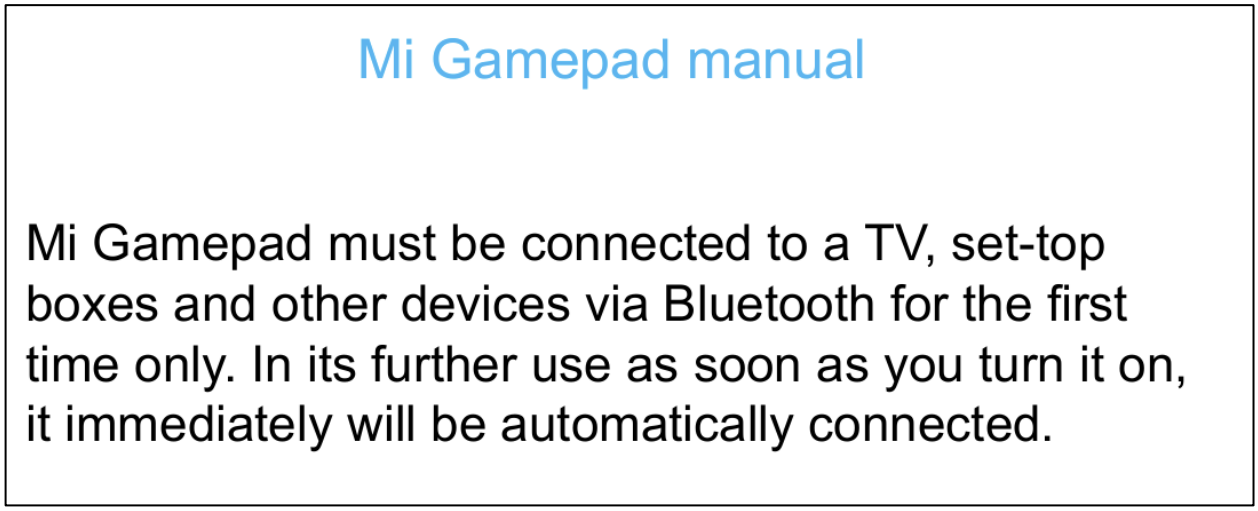


See https://www.youtube.com/watch?v=ht97YiL86o0.

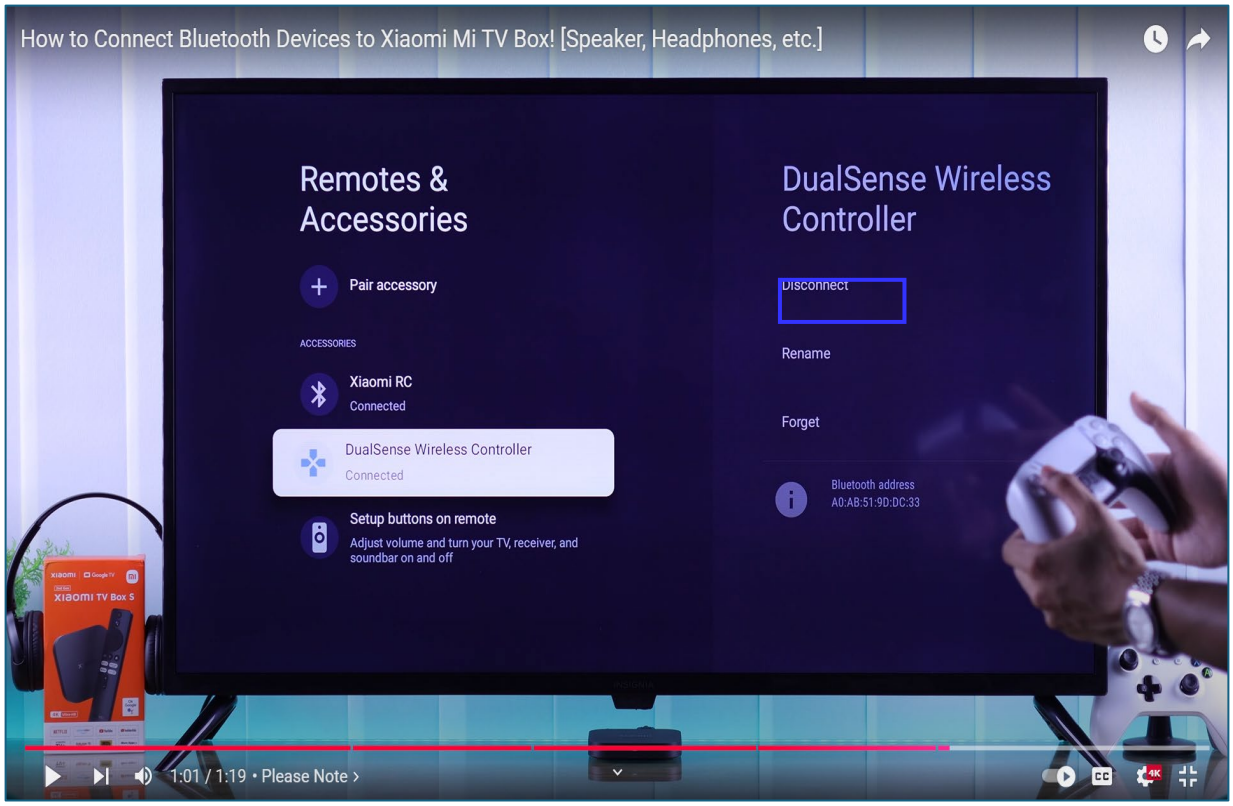
73. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of

various information comprising wherein the intelligent wireless HUB system (*e.g.*, Xiaomi TV Box) is further configured to communicate, through the network communication channel (*e.g.*, Wi-Fi), information regarding an updated status (*e.g.*, online/offline status of the device, battery level, etc.) about a home device or an office device (*e.g.*, MI 360 Security camera, game controller, etc.) in connection with a short range wireless communication (*e.g.*, Bluetooth) from a sensing device (*e.g.*, Bluetooth sensor), the sensing device being associated with the home device or the other device.

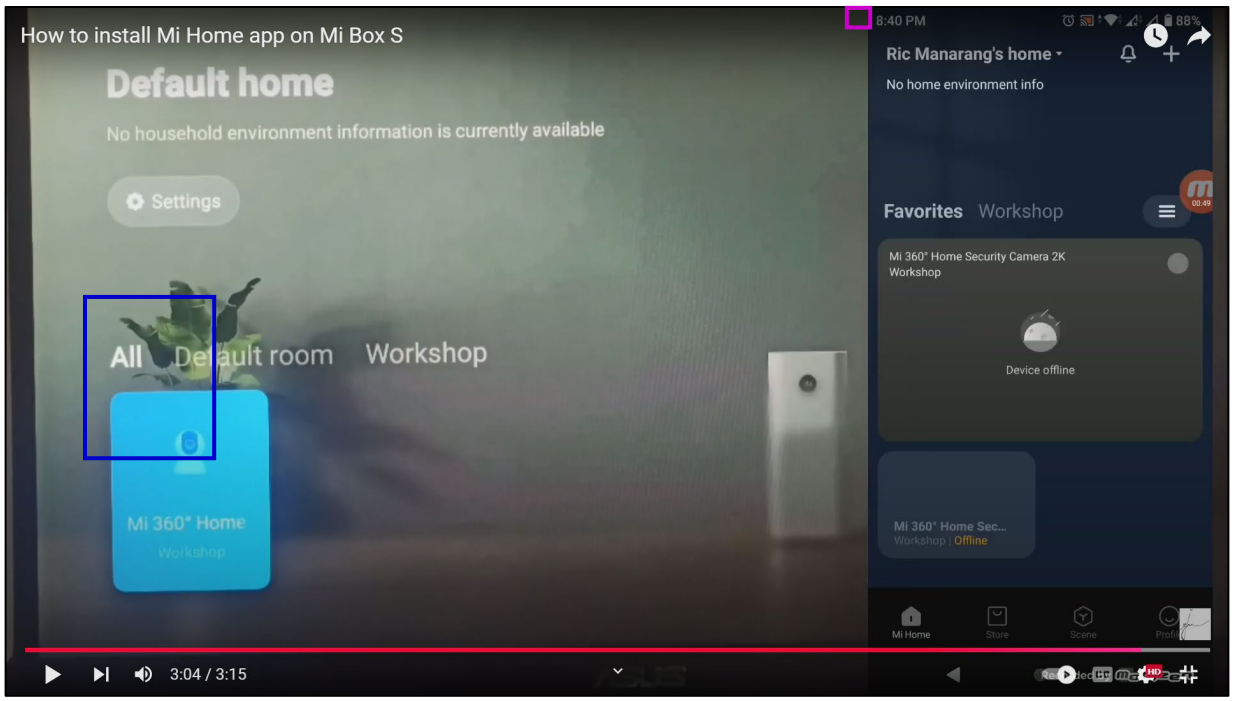
See https://www.mi.com/global/product/mi-box-s/#:~:text=WIFI%202.4GHz/5GHzDownload,are%20trademarks%20of%20Google%20Inc.



See https://files.miot-global.com/files/mi-gamepad/GamepadEN.PDF.



See https://www.youtube.com/watch?v=4ZEDTfqUTTQ.



See https://www.youtube.com/watch?v=UPeJSixSS-Q.

1) Smart Device Connections

In order to provide you with Xiaomi/Mi Home services and to enable you to securely connect to and manage your smart devices, we will collect your Wi-Fi information, location information, account login information, information related to your mobile phone and smart device, and information associated with your Mi Account and smart device.

This information will be used to provide you with various functionalities, including pairing with and connecting to smart devices, discovering nearby devices, and device management. Specific examples involving the above information are set out below:

- Account Login Information: Mi Account (the account ID may be the Xiaomi ID, phone number or email address), nickname, and profile picture information, as well as cookies (including Mi Account, serviceToken, country code, app store channel, and time zone) to log in to your account.
- Mobile Phone related Information: Hardware-based identifiers (MAC address, Android ID), phone model, OS version, OS language, country or region, app store version, screen size and resolution, CPU, and display device related information. Based on the type of smart device you wish to connect to, we will collect the following information:
    - Smart devices connected via Wi-Fi: Wi-Fi Information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and device ID.
    - After establishing a local connection via Bluetooth, smart devices connected via Wi-Fi: Wi-Fi information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and MAC address of Bluetooth on the device.
    - Smart devices connected via Bluetooth: MAC address of Bluetooth on the device, and device ID.
    - Smart devices connected via Zigbee: MAC address of the device, and device ID.

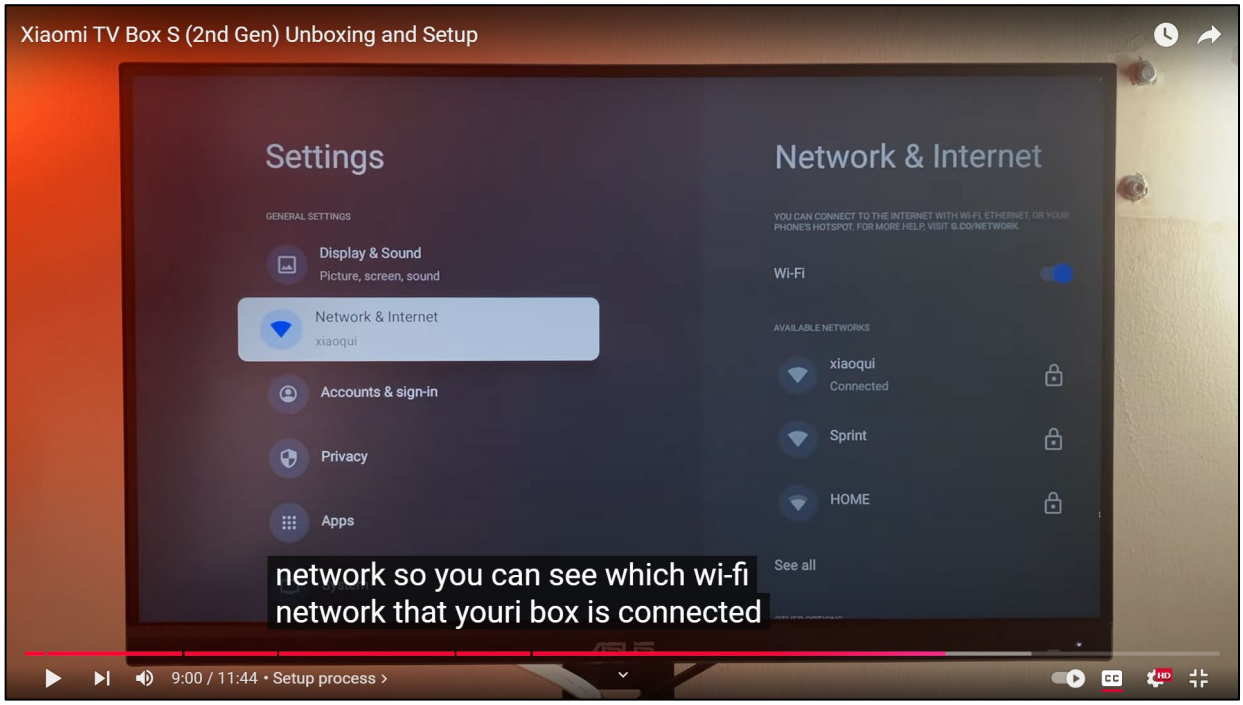
See https://trust.mi.com/docs/iot-privacy-white-paper-global/3/6.

74. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of various information comprising wherein the network communication channel (*e.g.*, Wi-Fi) is separate from short range wireless channel for the short range wireless communication (*e.g.*, Bluetooth).

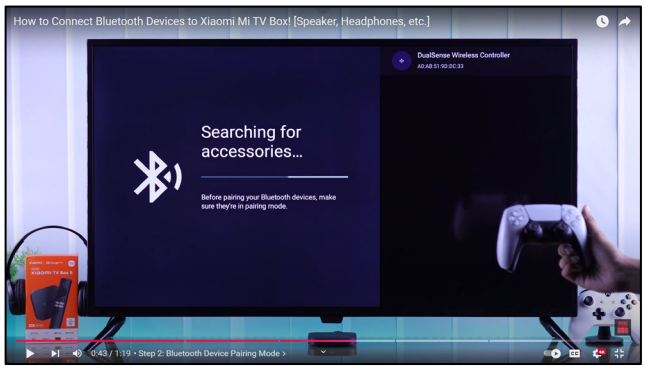
Xiaomi TV Box S 2nd Gen Overview

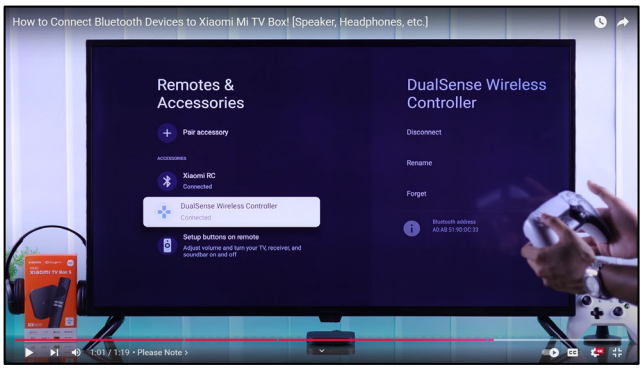
Specification	Output Resolution:	4K (3840 x 2160)
	CPU:	Quad-Core Cortex-A55
	GPU:	ARM Mali G31 MP2
	RAM:	2GB
	ROM:	8GB
	Operating system:	Google TV
Wireless connectivity	Wi-Fi:	2.4GHz/ 5GHz
	Bluetooth:	5.2

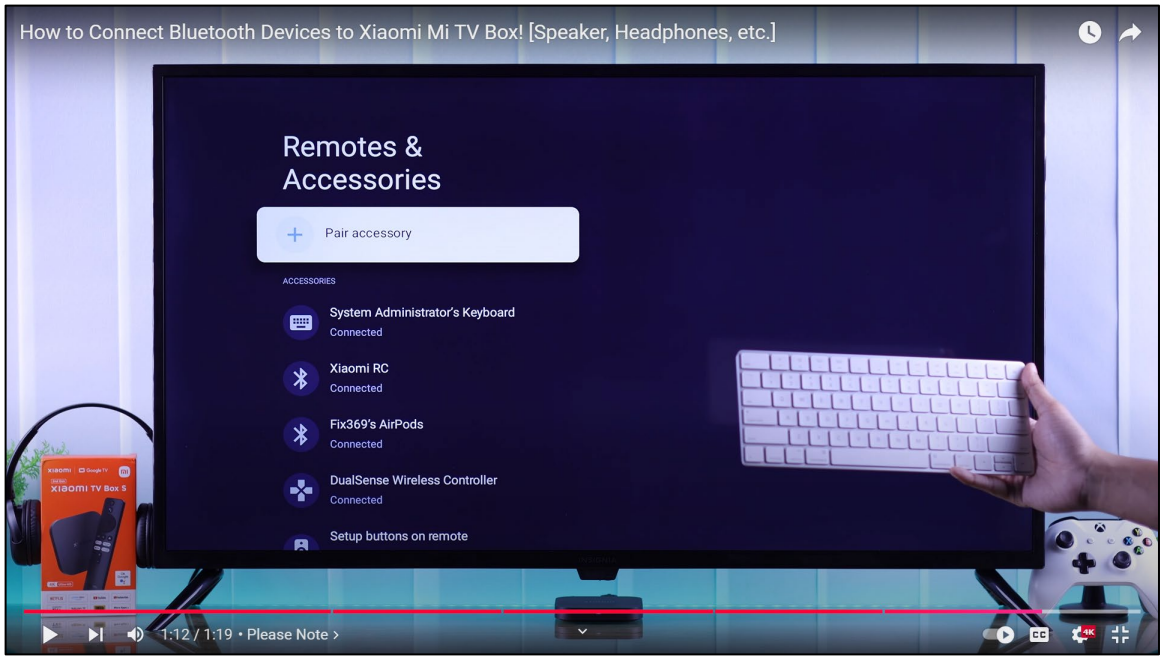
See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



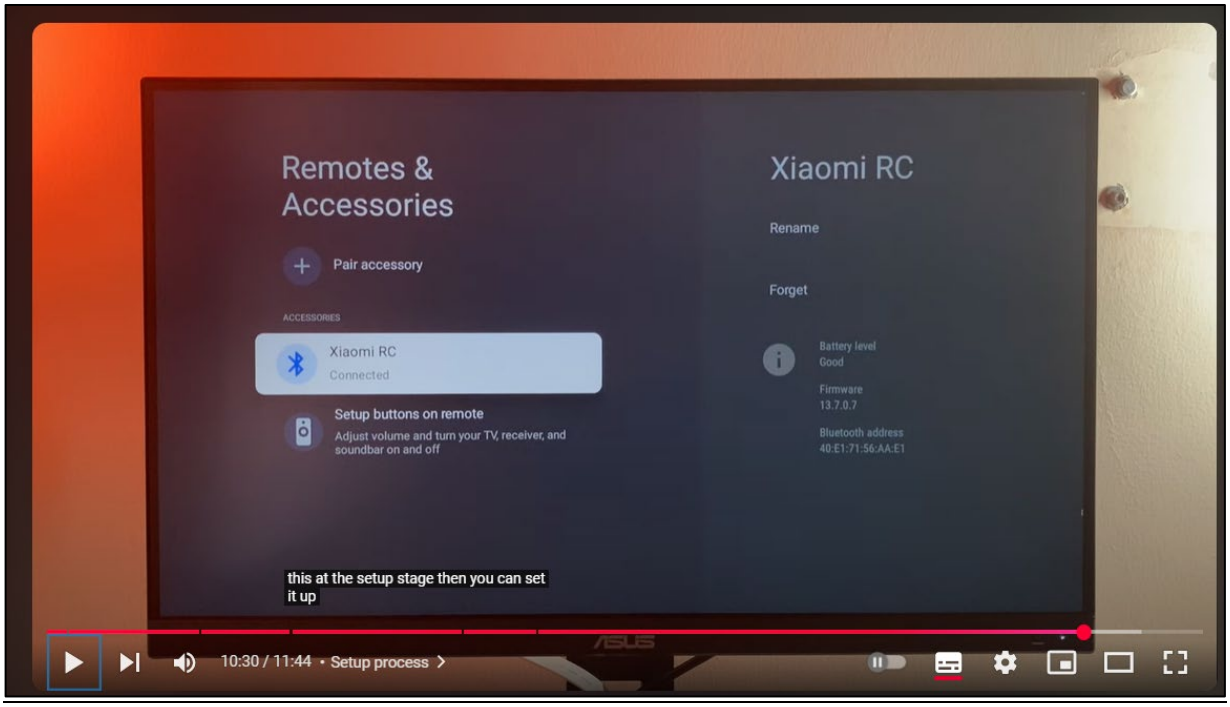
See https://www.youtube.com/watch?v=GfLB1-fwGro.







See https://www.youtube.com/watch?v=4ZEDTfqUTTQ.



See https://www.youtube.com/watch?v=GfLB1-fwGro.

75. On information and belief, one or more components of the Xiaomi Products and Services provides an intelligent wireless HUB system with a device identifier for communications of various information comprising wherein the device identifier corresponding to the intelligent wireless

HUB system (*e.g.*, Serial number, Device ID, name given by the user, etc. of the Xiaomi TV box) is stored in association with a user account (*e.g.*, email/Mi account), identification information associated with the sensing device stored (*e.g.*, Bluetooth address, Device ID) in association with a unique phone identifier of a cellular phone in the user account.

See https://www.mi.com/global/support/article/KA-06321/.

1) Smart Device Connections

In order to provide you with Xiaomi/Mi Home services and to enable you to securely connect to and manage your smart devices, we will collect your Wi-Fi information, location information, account login information, information related to your mobile phone and smart device, and information associated with your Mi Account and smart device.

This information will be used to provide you with various functionalities, including pairing with and connecting to smart devices, discovering nearby devices, and device management. Specific examples involving the above information are set out below:

- Account Login Information: Mi Account (the account ID may be the Xiaomi ID, phone number or email address), nickname, and profile picture information, as well as cookies (including Mi Account, serviceToken, country code, app store channel, and time zone) to log in to your account.
- Mobile Phone related Information: Hardware-based identifiers (MAC address, Android ID), phone model, OS version, OS language, country or region, app store version, screen size and resolution, CPU, and display device related information. Based on the type of smart device you wish to connect to, we will collect the following information:
  - Smart devices connected via Wi-Fi: Wi-Fi Information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and device ID.
  - After establishing a local connection via Bluetooth, smart devices connected via Wi-Fi: Wi-Fi information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and MAC address of Bluetooth on the device.
  - Smart devices connected via Bluetooth: MAC address of Bluetooth on the device, and device ID.
  - Smart devices connected via Zigbee: MAC address of the device, and device ID.

See https://trust.mi.com/docs/iot-privacy-white-paper-global/3/6.

76. On information and belief, Xiaomi directly infringes at least claim 47 of the ’125 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Xiaomi Products and Services.

77. Innovation Sciences has been damaged by Defendants’ infringement and has caused / continues to cause it to suffer irreparable harm and damages as a result of the infringement.

78. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

Count IV – Infringement of United States Patent No. 10,469,898

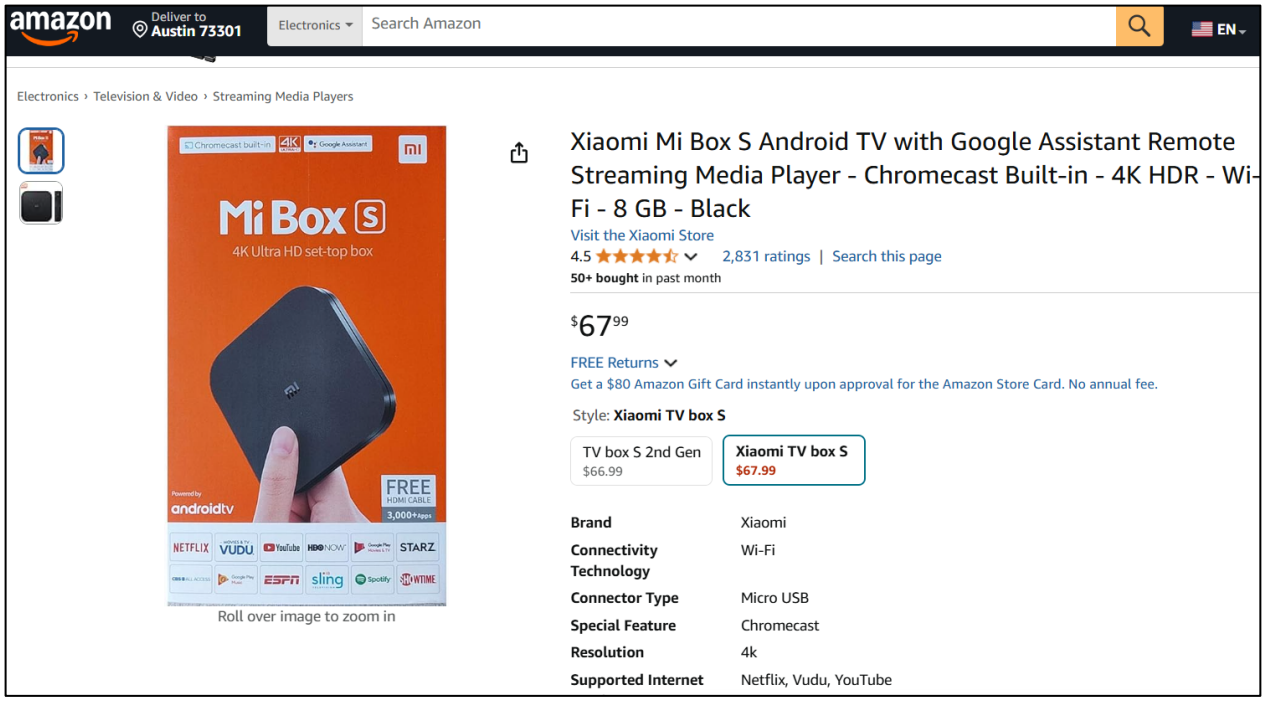
79. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

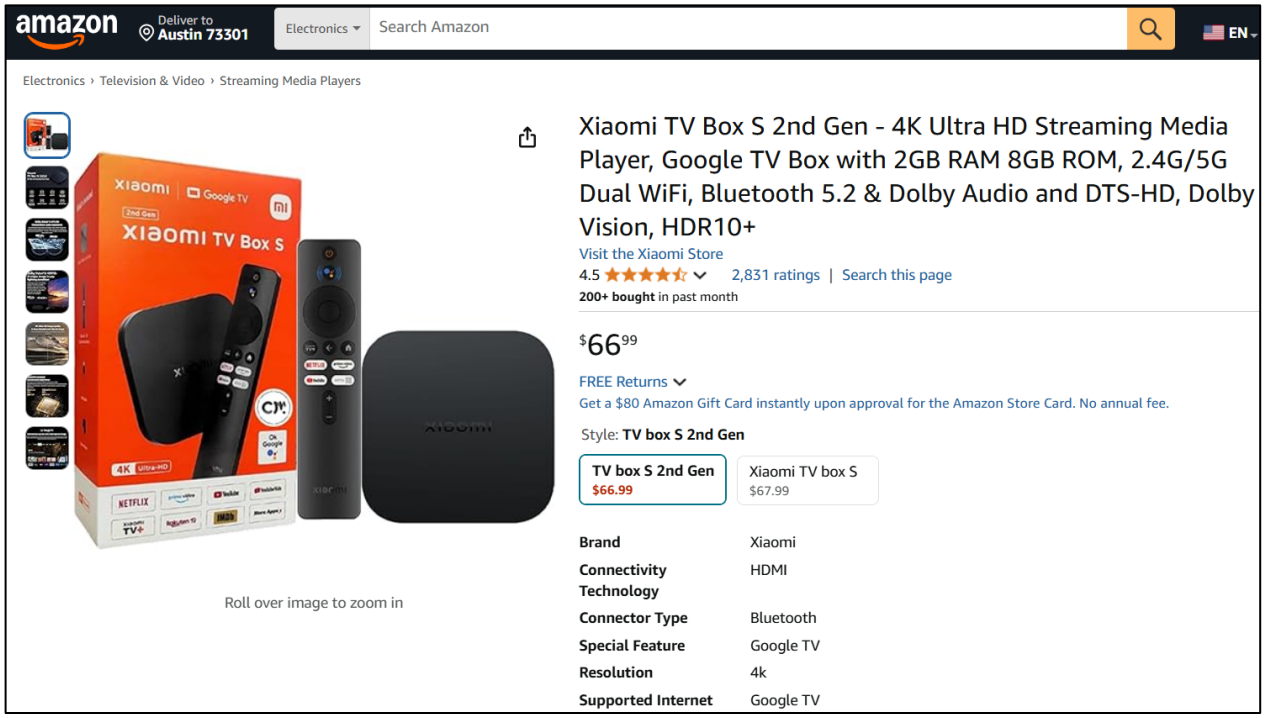
80. Innovation Sciences repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

81. On information and belief, Xiaomi violated 35 U.S. C. § 271(a) with respect to one or more claims of the ’898 patent.

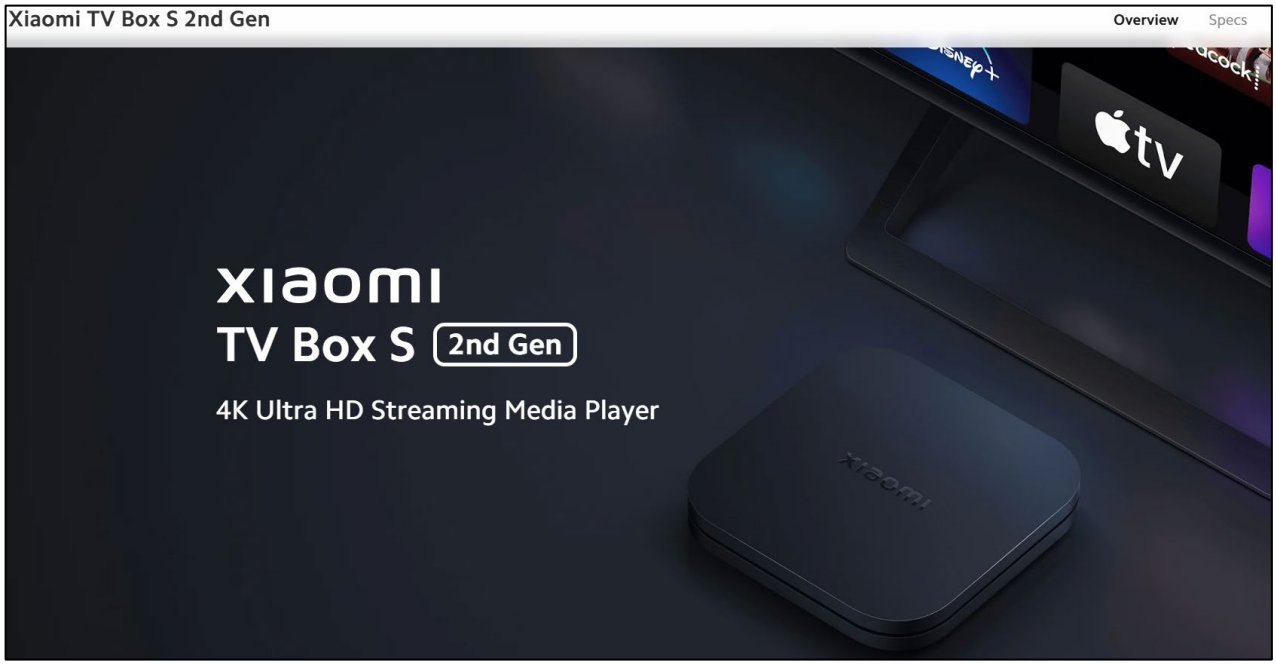
82. On information and belief, Xiaomi (or those acting on its behalf) (i) make, use, sell, sell access to, import, offer to sell and/or offer to sell access to the Xiaomi Products and Services in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 10 of ’898 patent.

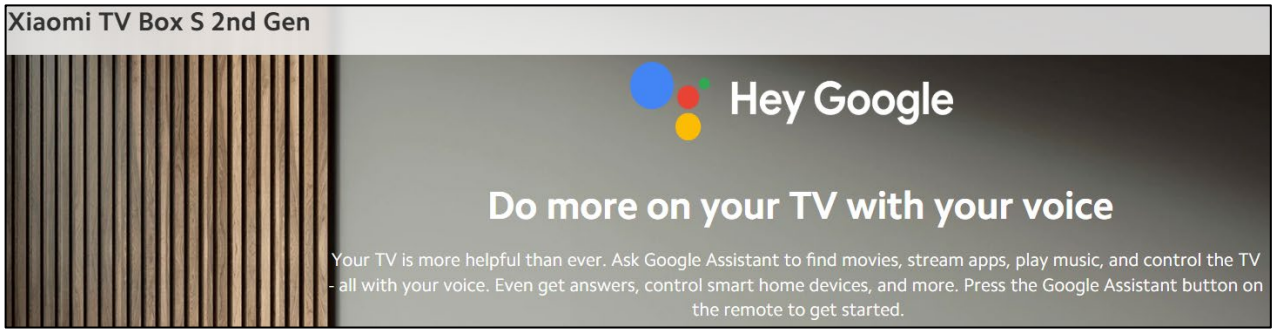
83. On information and belief, one or more components of the Xiaomi Products and Services (*e.g.*, Xiaomi TV Box) provides a method for communicating information by a centralized HUB system (*e.g.*, the Xiaomi TV Box) with a device identifier (*e.g.*, Serial number, Device ID, name given by the user, etc. of the Xiaomi TV box).

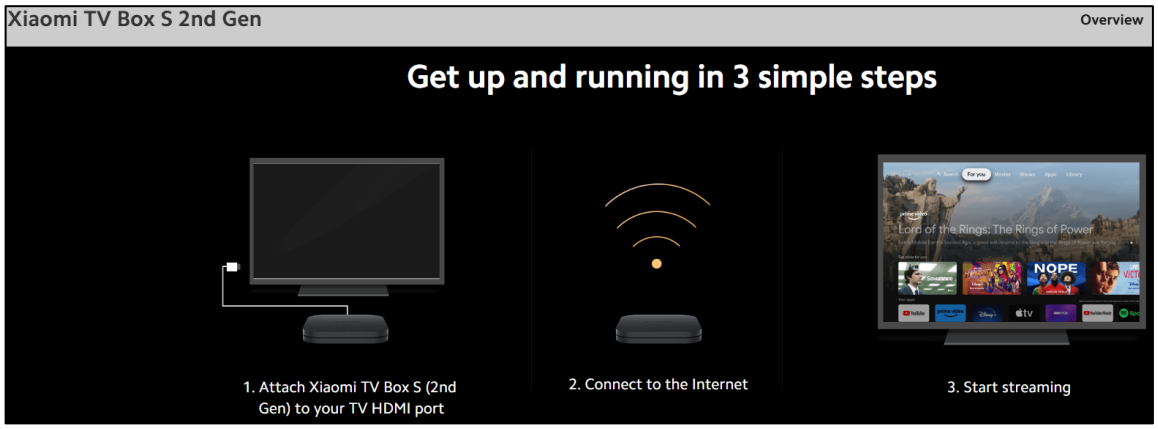




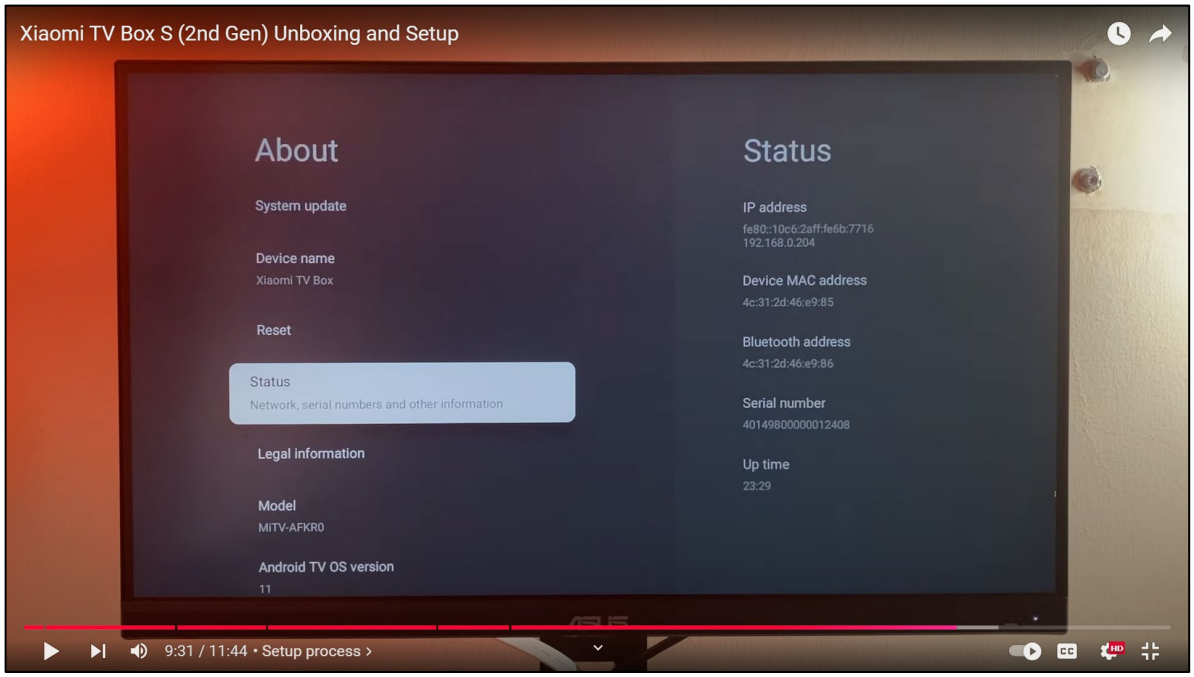
See Amazon.com: Xiaomi Mi Box S Android TV with Google Assistant Remote Streaming Media Player - Chromecast Built-in - 4K HDR - Wi-Fi - 8 GB - Black : Electronics.







See Xiaomi TV Box S 2nd Gen - Xiaomi United States.



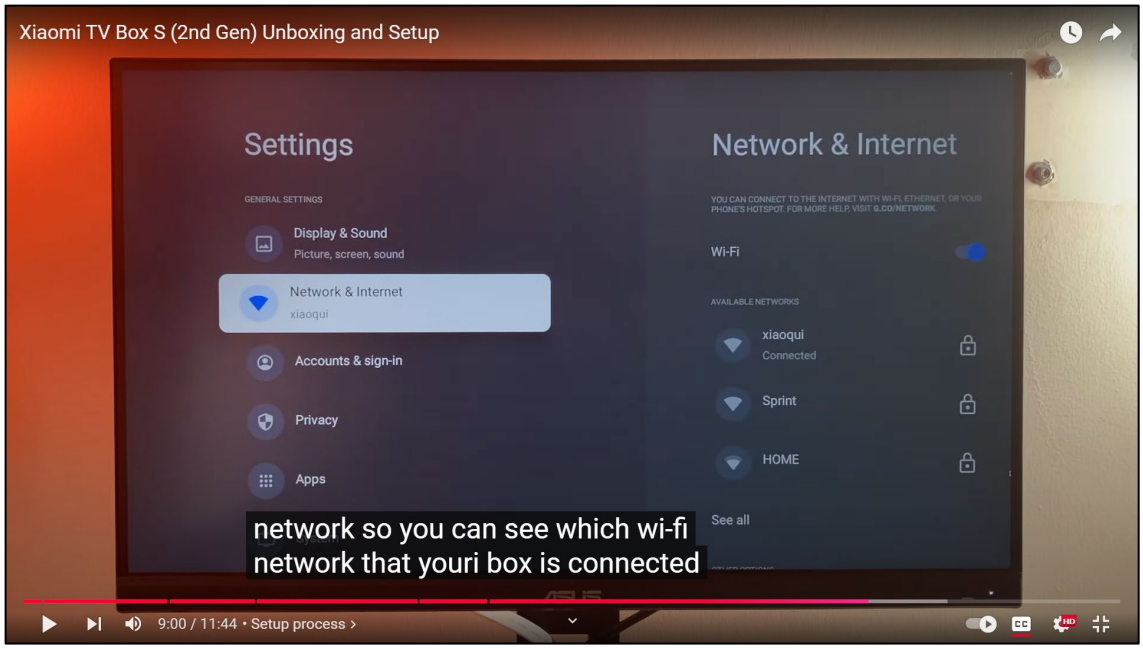
See https://www.youtube.com/watch?v=GfLB1-fwGro.

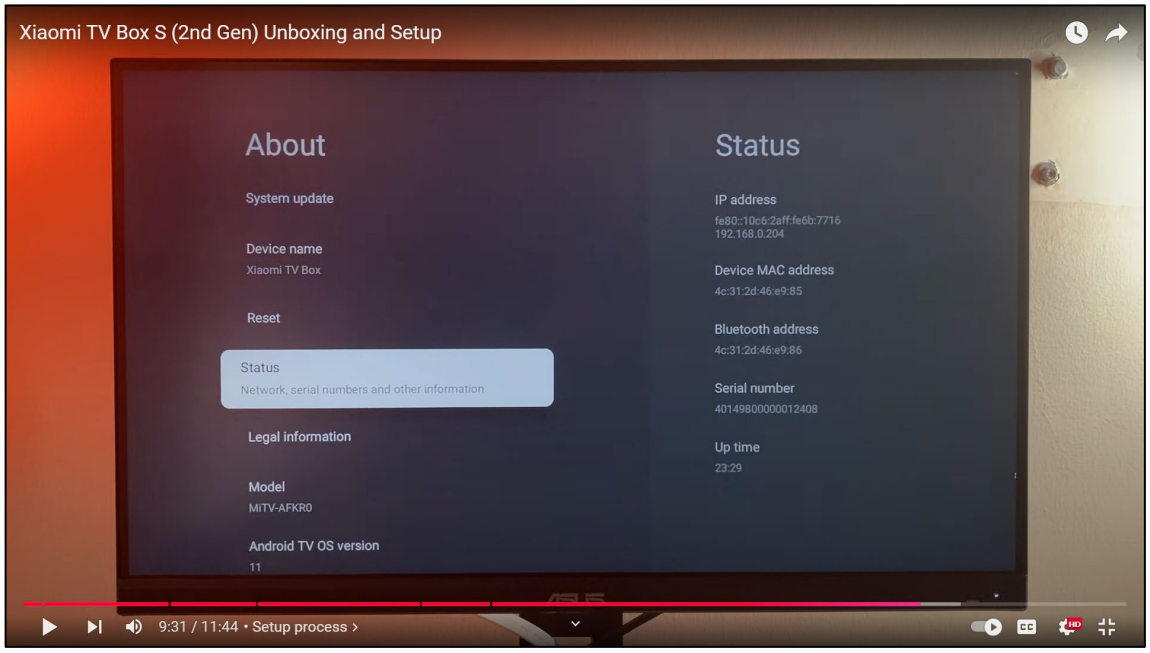
84. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising communicating configured data (*e.g.*, IP address, Bluetooth address, Device ID, etc.) in initiating communications that are directed to the centralized HUB system (*e.g.*, Xiaomi TV Box), the configured data comprising information corresponding to a network address (*e.g.*, IP address) associated with a wireless local area network and information corresponding to the device identifier (*e.g.*, Serial number, Device ID, name given by the user, etc. of the Xiaomi TV box).

11.Q: How does Mi box connect network?

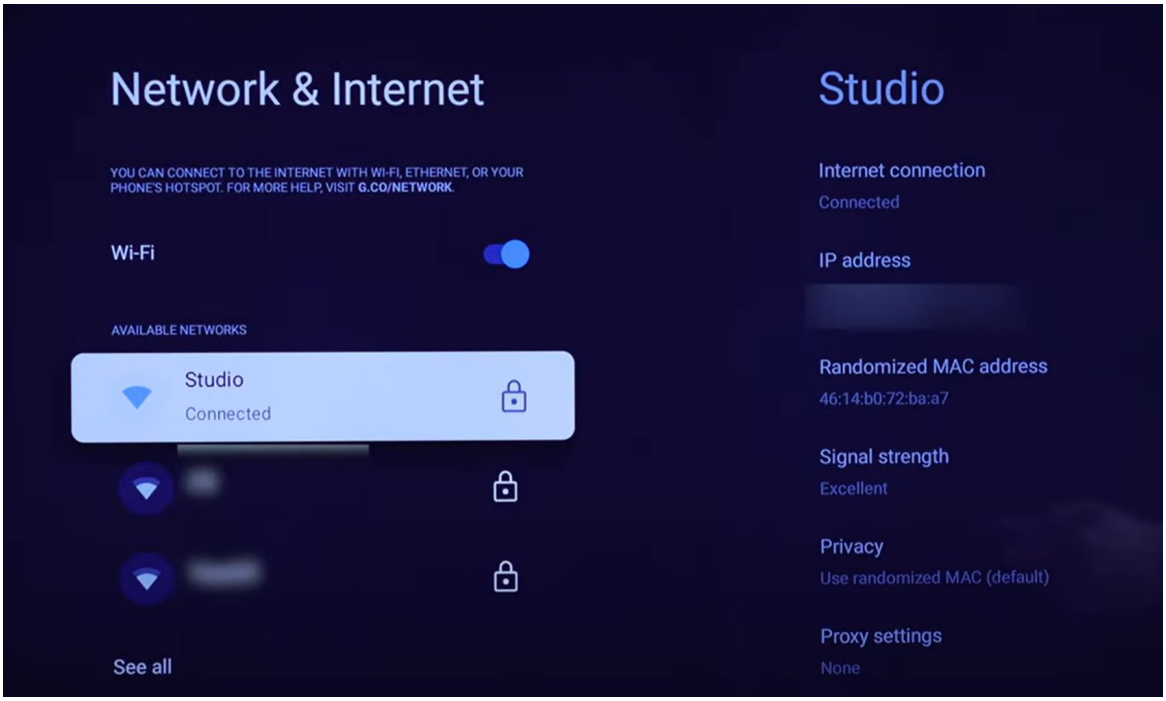
A: Through wireless and wired modes: wired mode can be directly plugged into the network cable (the cable must be directly connected to the router), wireless mode only needs to enter the mi Box system setting interface, search for wireless signals, select Wi-Fi hotspots, and set according to the prompts.

See https://www.mi.com/global/support/faq/details/KA-06557/.



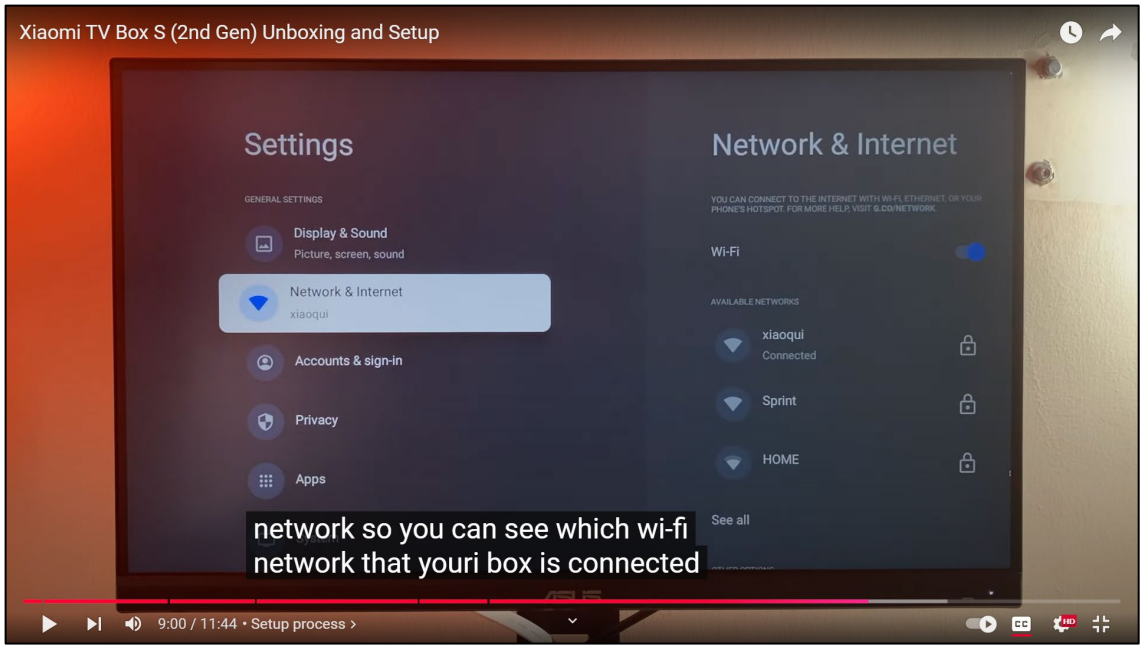


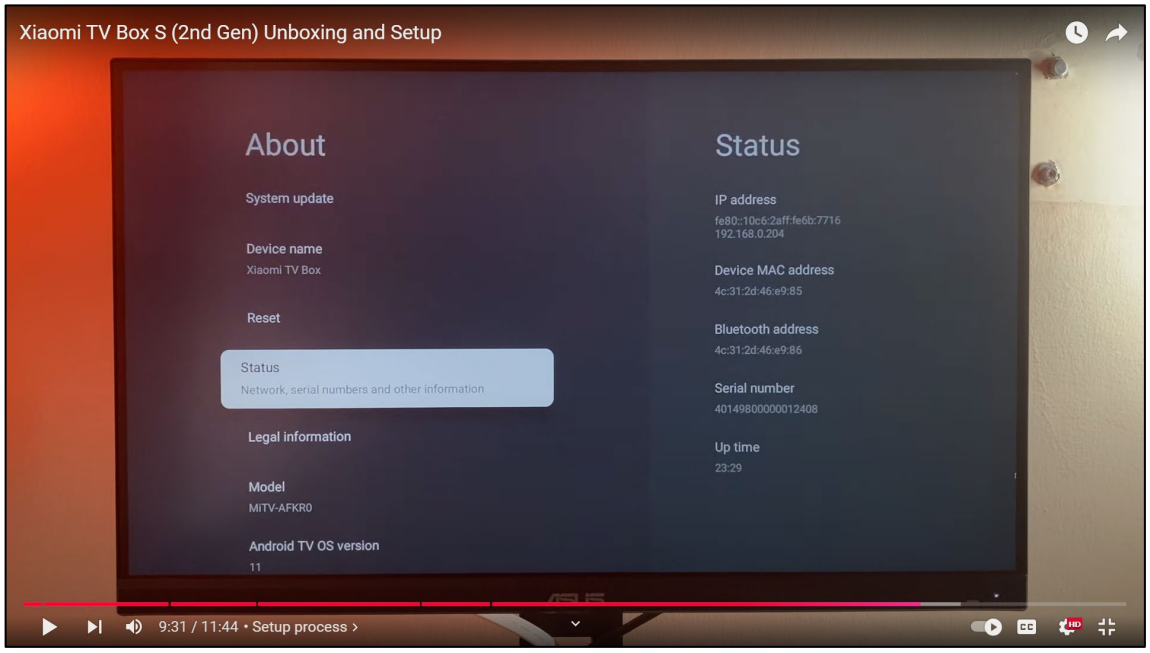
See Xiaomi TV Box Unboxing and Setup.



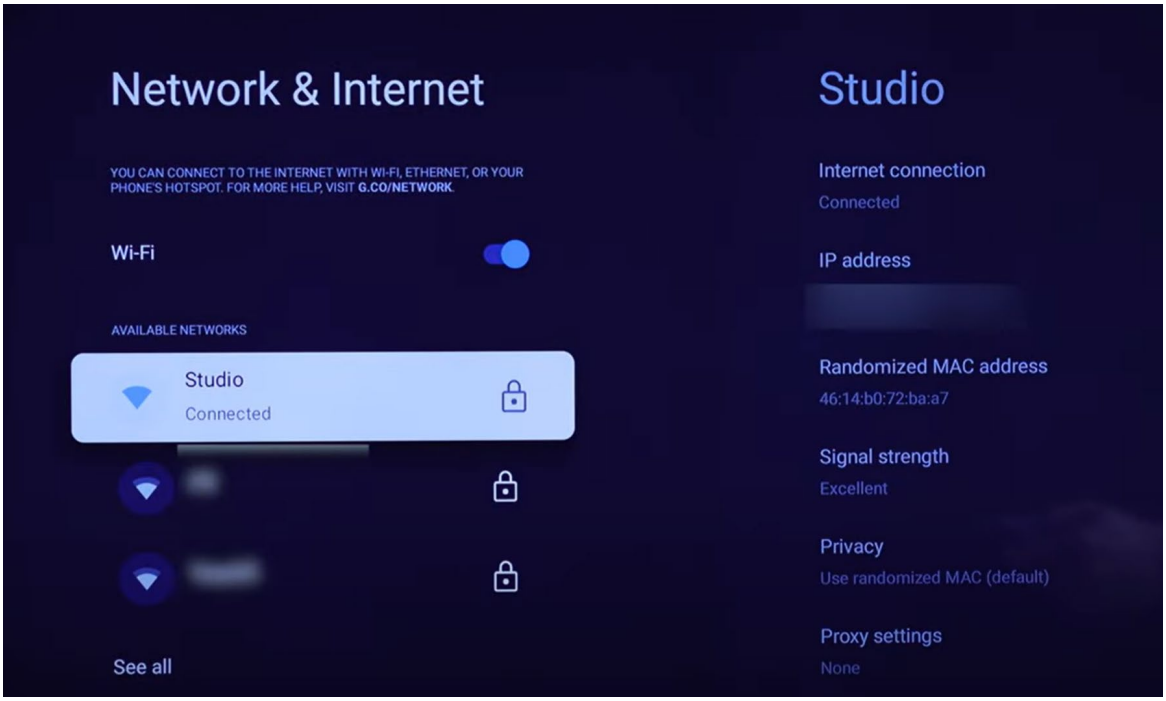
See Xiaomi TV Box 4K: How To Setup Properly! [Install For First Time Use]; https://www.youtube.com/watch?v=4xjLd7M3BA4&list=PL0vzxv5F0VaP1aeh_uaVcSfJGjbfTpEQB.

85. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising the network address (*e.g.*, IP address) association (*e.g.*, Address Resolution Protocol (ARP) converts an IP address to a MAC address) associated with the device identifier (*e.g.*, Serial number, Device ID, name given by the user, etc. of the Xiaomi TV box).





See Xiaomi TV Box Unboxing and Setup.



See Xiaomi TV Box 4K: How To Setup Properly! [Install For First Time Use]; https://www.youtube.com/watch?v=4xjLd7M3BA4&list=PL0vzxv5F0VaP1aeh_uaVcSfJGjbfTpEQB.

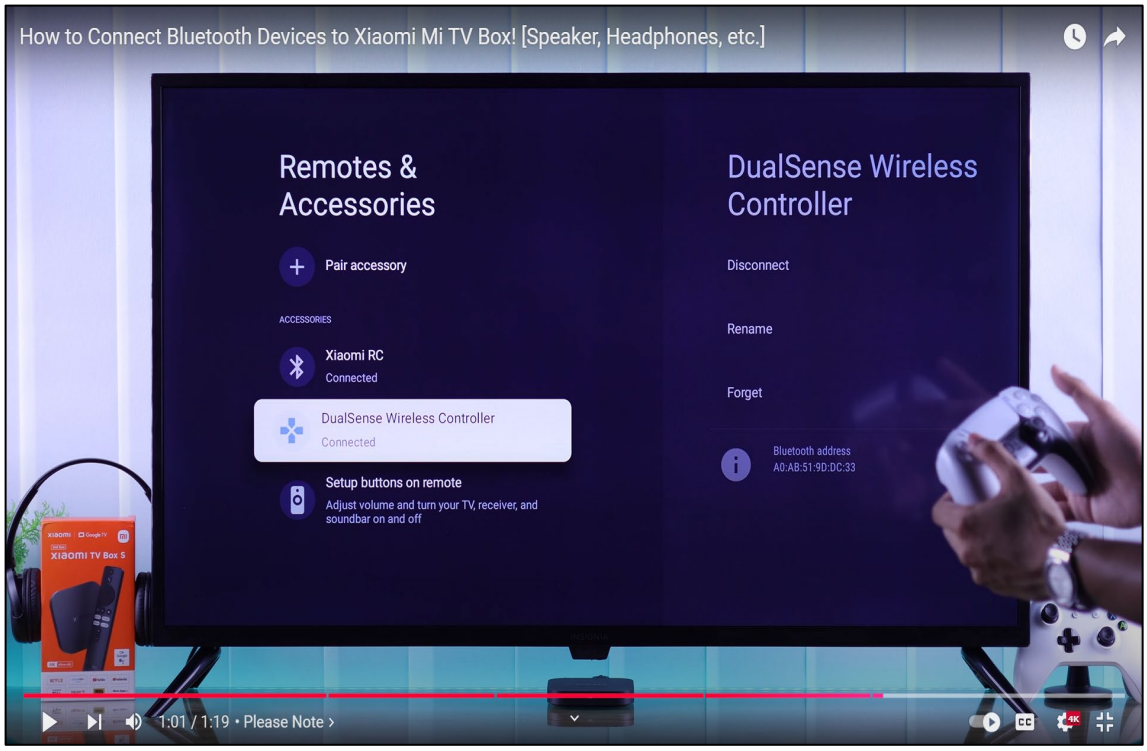
86. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising communicating, via a network interface (*e.g.*, Wi-Fi interface) and via a network communication channel of the wireless local area network (*e.g.*, Wi-Fi network), information about an updated status (*e.g.*, online/offline status or connected/disconnected status) of the home device or the office device (*e.g.*, MI 360 Security camera, game controller, etc.) in connection with a wireless signal (*e.g.*, Bluetooth signal) transmitted through a wireless channel (*e.g.*, Bluetooth channel) regarding the updates status, the wireless channel regarding the updated status, the wireless signal comprising information corresponding to a unique identifier (*e.g.*, Bluetooth address of the home device or the office device, game controller) associated with the home device or the office device, the unique identifier associated with a unique phone identifier of a cellular phone (*e.g.*, phone number associated with the cellular phone have Mi Home App).

See https://www.mi.com/global/product/mi-box-s/#:~:text=WIFI%202.4GHz/5GHzDownload,are%20trademarks%20of%20Google%20Inc.

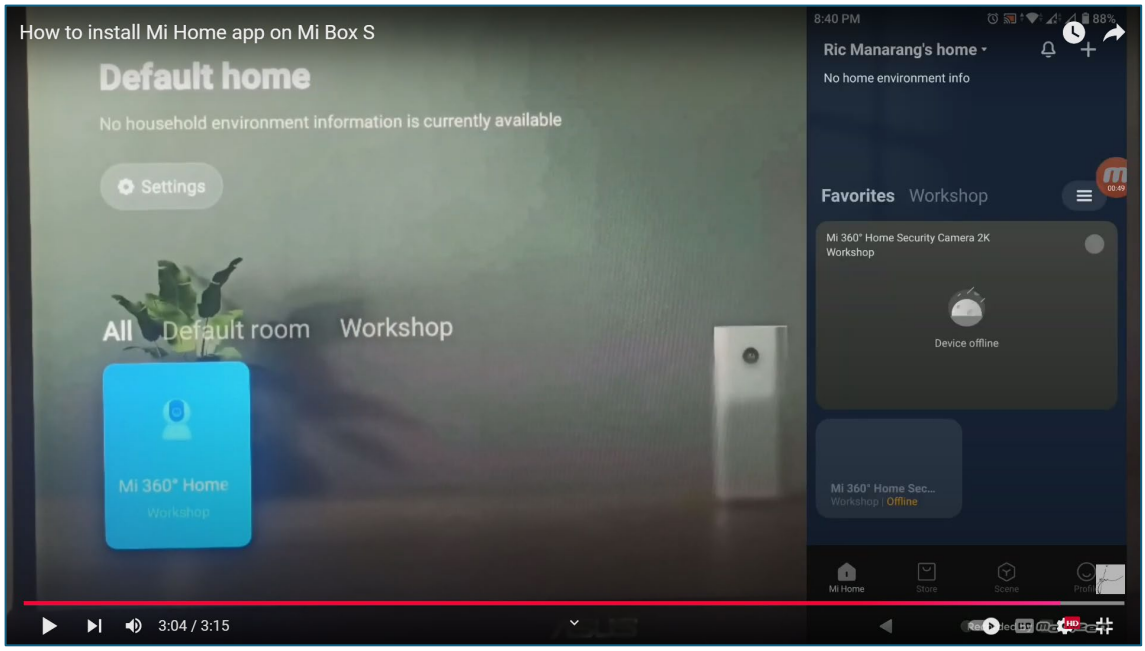
Mi Gamepad manual

Mi Gamepad must be connected to a TV, set-top boxes and other devices via Bluetooth for the first time only. In its further use as soon as you turn it on, it immediately will be automatically connected.

See https://files.miot-global.com/files/mi-gamepad/GamepadEN.PDF.



See (1) How to Connect Bluetooth Devices to Xiaomi Mi TV Box! [Speaker, Headphones, etc.] - YouTube; https://www.youtube.com/watch?v=4ZEDTfqUTTQ.



See How to install Mi Home app on Mi Box S; https://www.youtube.com/watch?v=UPeJSixSS-Q&t=5s.

See Xiaomi Global Home.

1) Smart Device Connections

In order to provide you with Xiaomi/Mi Home services and to enable you to securely connect to and manage your smart devices, we will collect your Wi-Fi information, location information, account login information, information related to your mobile phone and smart device, and information associated with your Mi Account and smart device.

This information will be used to provide you with various functionalities, including pairing with and connecting to smart devices, discovering nearby devices, and device management. Specific examples involving the above information are set out below:

- Smart devices connected via Wi-Fi: Wi-Fi Information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and device ID.
- After establishing a local connection via Bluetooth, smart devices connected via Wi-Fi: Wi-Fi information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and MAC address of Bluetooth on the device.
- Smart devices connected via Bluetooth: MAC address of Bluetooth on the device, and device ID.
- Smart devices connected via Zigbee: MAC address of the device, and device ID.

See 3.6 Xiaomi/Mi Home And Privacy.

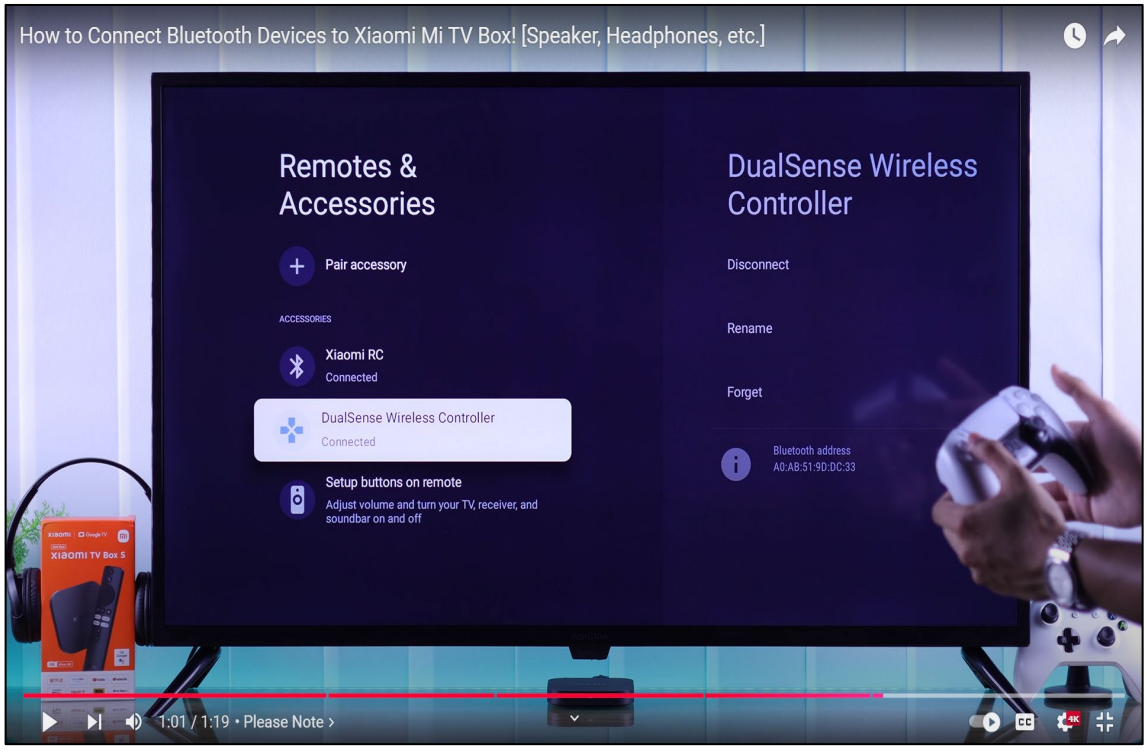
Xiaomi TV Box S 2nd Gen

Overview

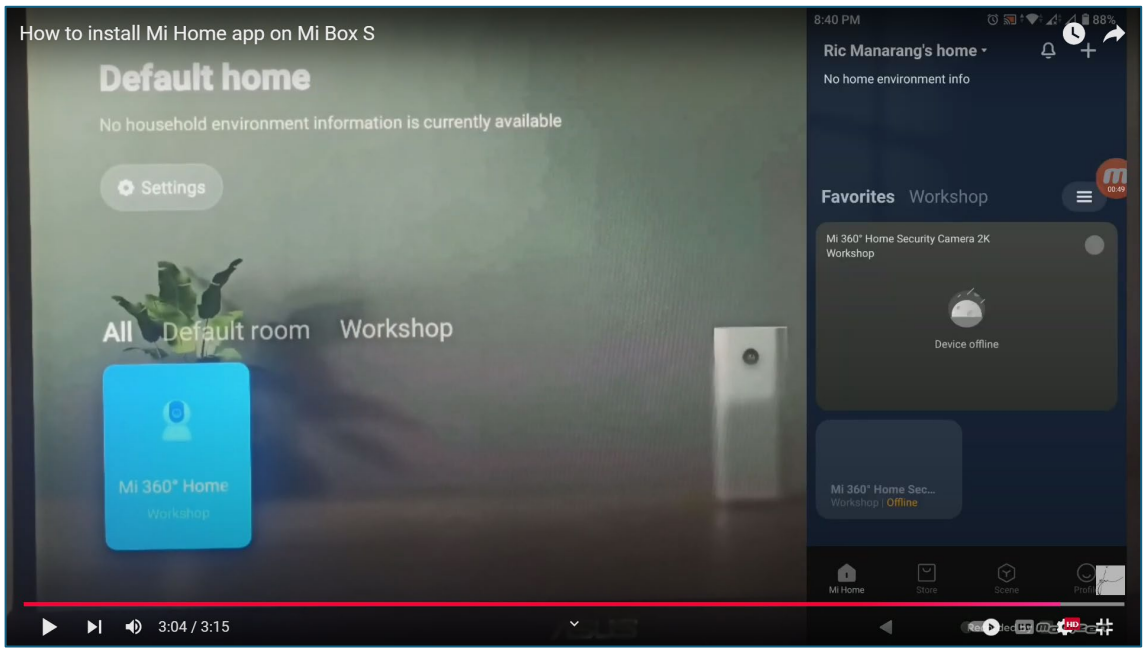
Specification	Output Resolution:	4K (3840 x 2160)
	CPU:	Quad-Core Cortex-A55
	GPU:	ARM Mali G31 MP2
	RAM:	2GB
	ROM:	8GB
	Operating system:	Google TV
Wireless connectivity	Wi-Fi:	2.4GHz/ 5GHz
	Bluetooth:	5.2

See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.

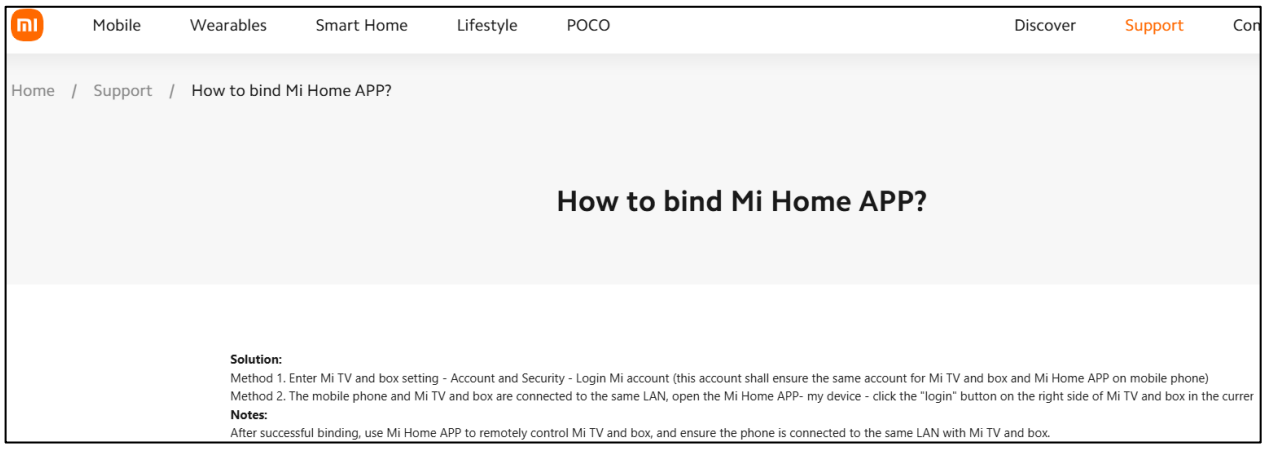
87. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising wherein the information about the updated status (*e.g.*, online/offline status or connected/disconnected status) is communicated to a user in connection with recognition of the unique identifier (*e.g.*, Bluetooth address of the home device or the office device, game controller).



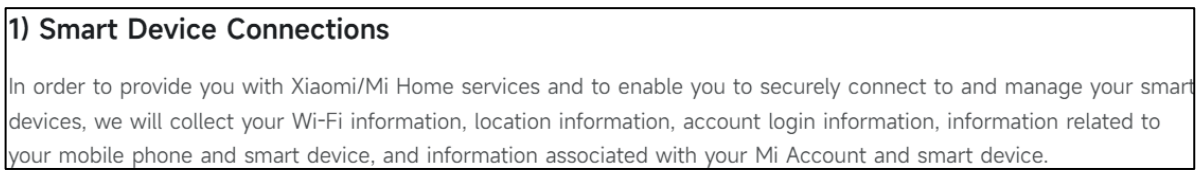
See (1) How to Connect Bluetooth Devices to Xiaomi Mi TV Box! [Speaker, Headphones, etc.] - YouTube; https://www.youtube.com/watch?v=4ZEDTfqUTTQ.



See How to install Mi Home app on Mi Box S; https://www.youtube.com/watch?v=UPeJSixSS-Q&t=5s.



See Xiaomi Global Home.

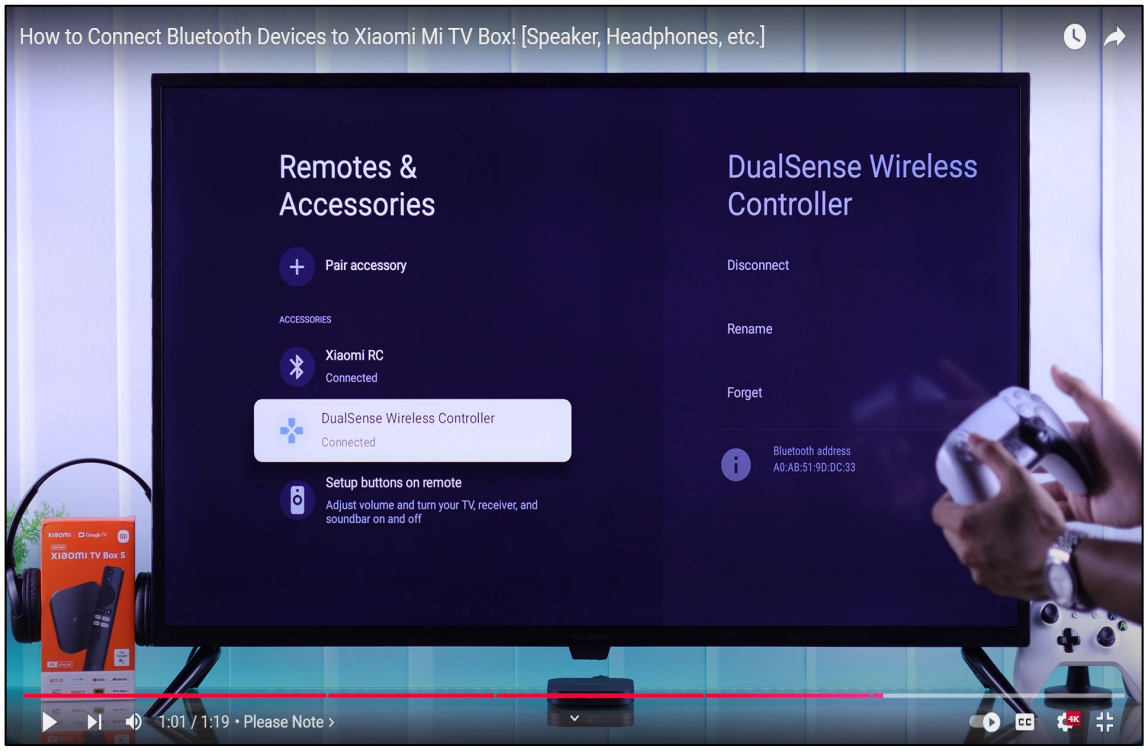


This information will be used to provide you with various functionalities, including pairing with and connecting to smart devices, discovering nearby devices, and device management. Specific examples involving the above information are set out below:

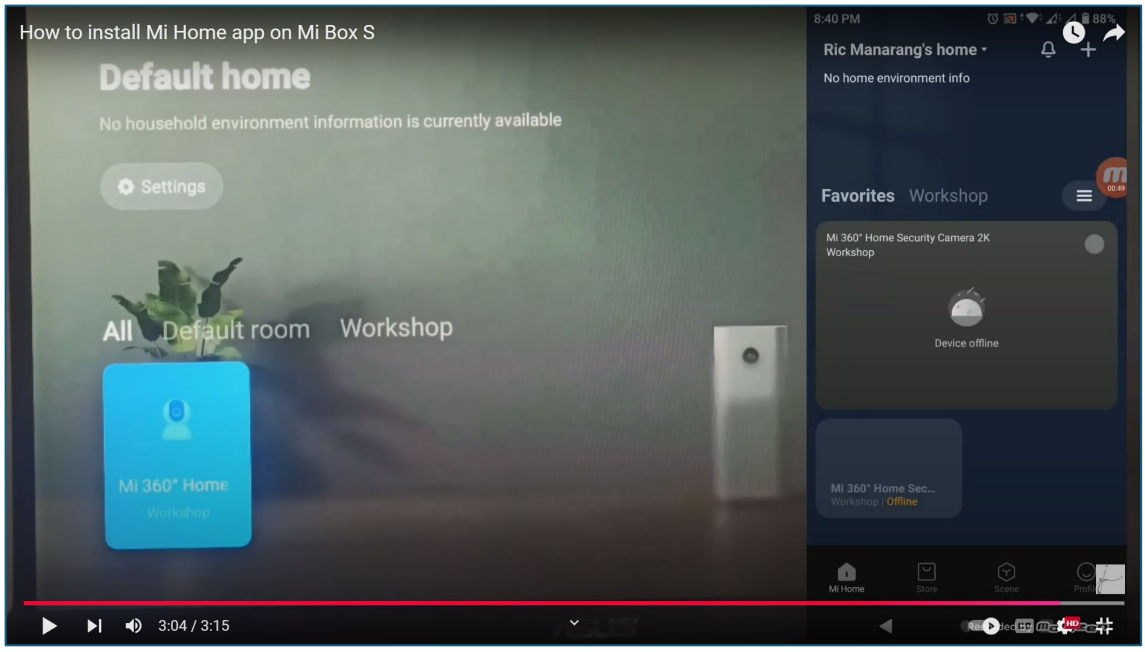
- Smart devices connected via Wi-Fi: Wi-Fi Information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and device ID.
- After establishing a local connection via Bluetooth, smart devices connected via Wi-Fi: Wi-Fi information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and MAC address of Bluetooth on the device.
- Smart devices connected via Bluetooth: MAC address of Bluetooth on the device, and device ID.
- Smart devices connected via Zigbee: MAC address of the device, and device ID.

See 3.6 Xiaomi/Mi Home And Privacy.

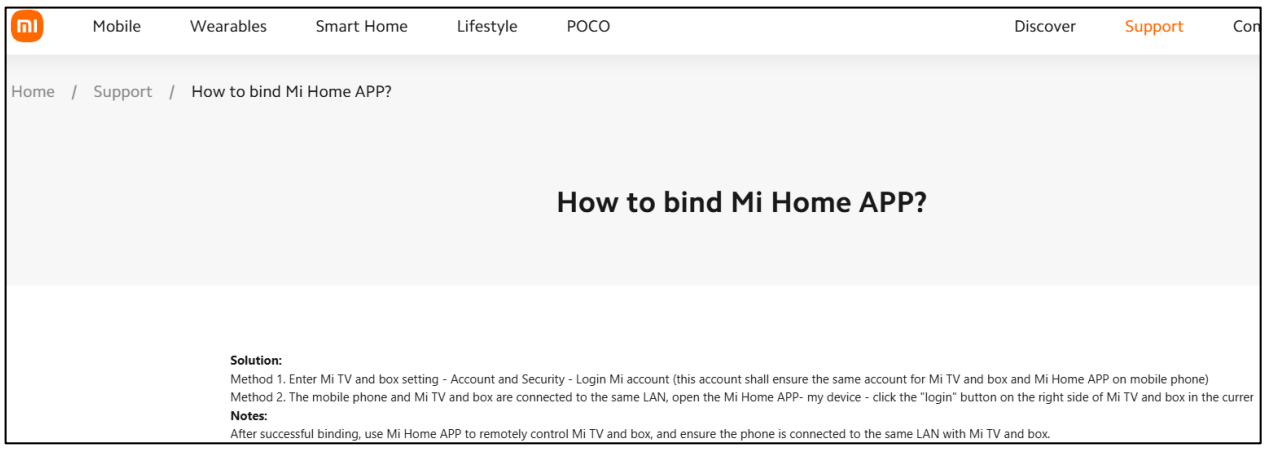
88. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising wherein the information about the updated status (*e.g.*, online/offline status or connected/disconnected status) is communicated to the user according to a configuration setting (*e.g.*, specifying how to notify the user about the updated status).



See (1) How to Connect Bluetooth Devices to Xiaomi Mi TV Box! [Speaker, Headphones, etc.] - YouTube; https://www.youtube.com/watch?v=4ZEDTfqUTTQ.



See How to install Mi Home app on Mi Box S; https://www.youtube.com/watch?v=UPeJSixSS-Q&t=5s.



See Xiaomi Global Home.

1) Smart Device Connections

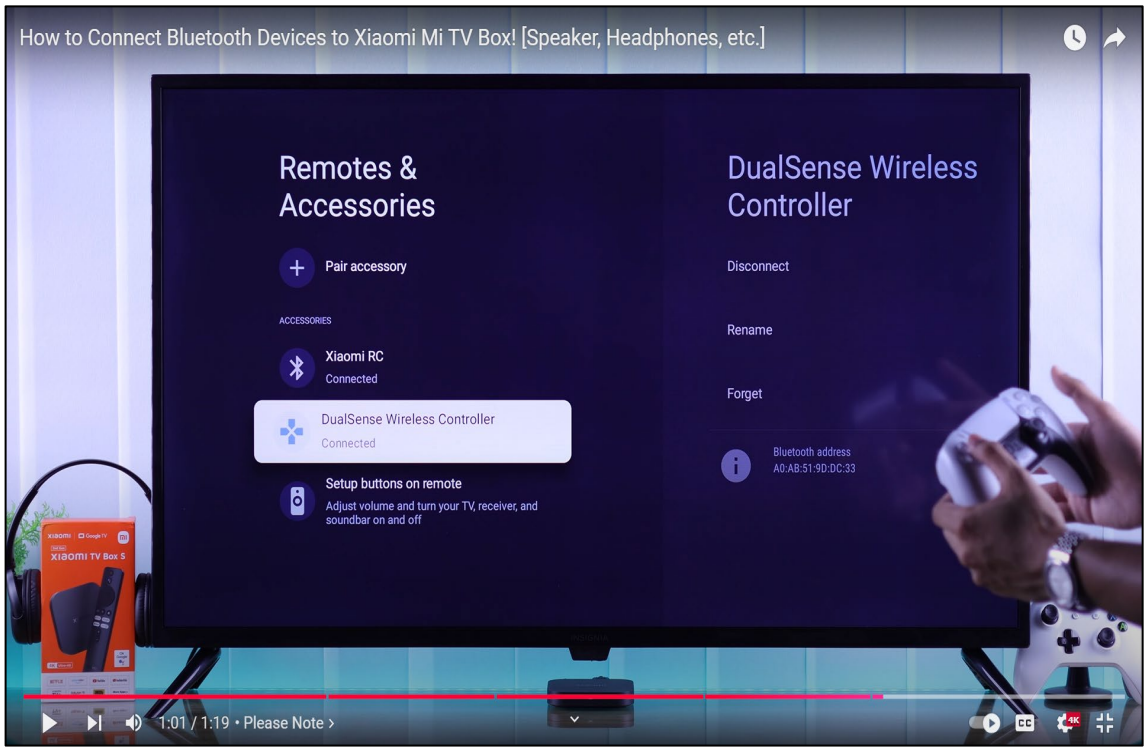
In order to provide you with Xiaomi/Mi Home services and to enable you to securely connect to and manage your smart devices, we will collect your Wi-Fi information, location information, account login information, information related to your mobile phone and smart device, and information associated with your Mi Account and smart device.

This information will be used to provide you with various functionalities, including pairing with and connecting to smart devices, discovering nearby devices, and device management. Specific examples involving the above information are set out below:

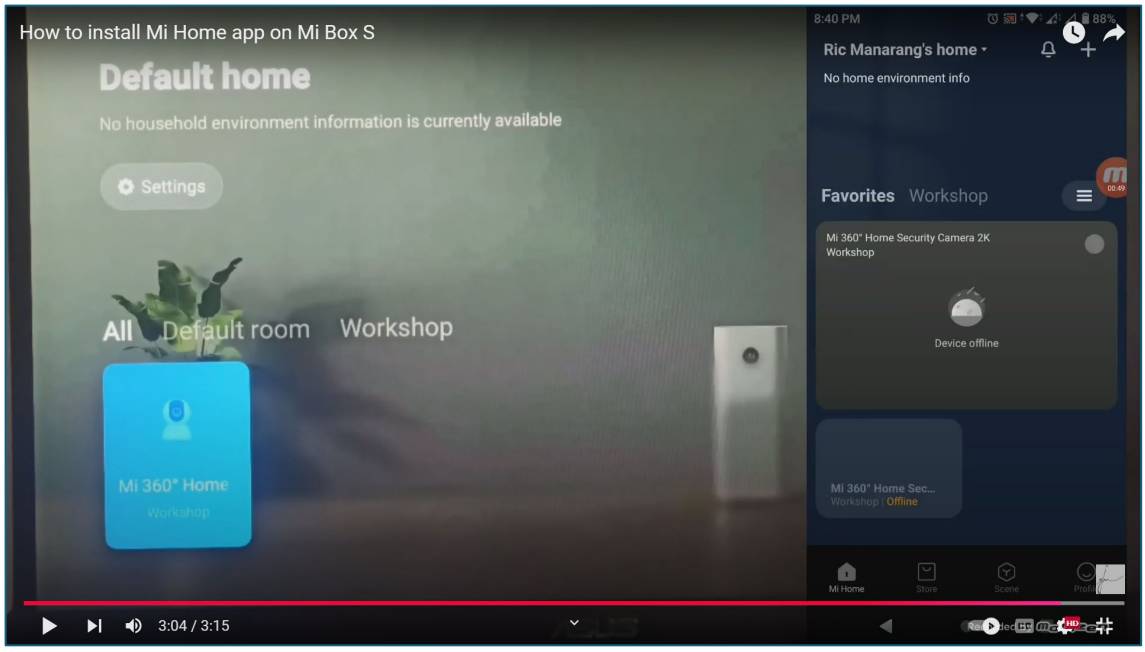
- Smart devices connected via Wi-Fi: Wi-Fi Information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and device ID.
- After establishing a local connection via Bluetooth, smart devices connected via Wi-Fi: Wi-Fi information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and MAC address of Bluetooth on the device.
- Smart devices connected via Bluetooth: MAC address of Bluetooth on the device, and device ID.
- Smart devices connected via Zigbee: MAC address of the device, and device ID.

See 3.6 Xiaomi/Mi Home And Privacy.

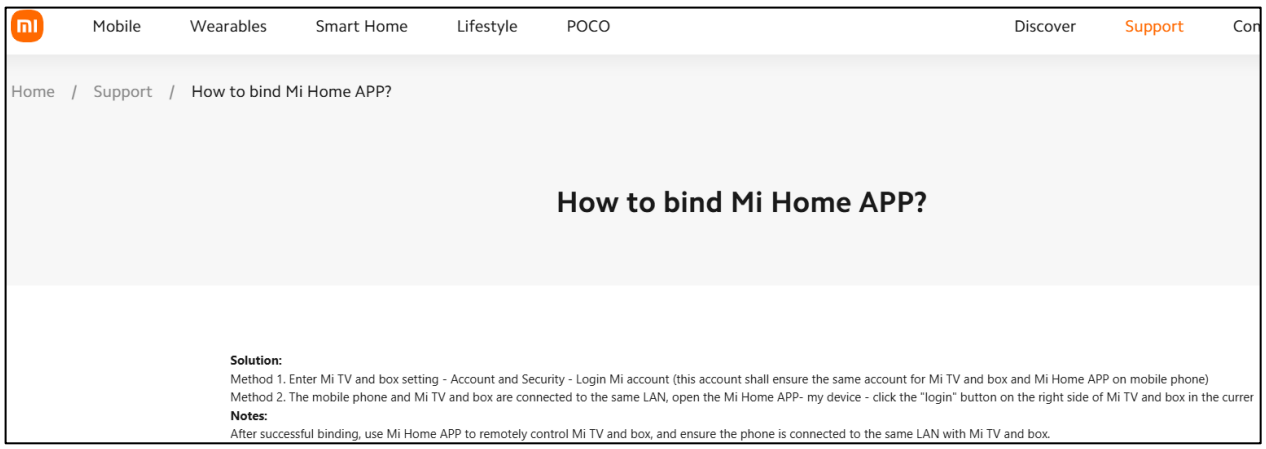
89. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising wherein the configuration setting specifies when and how to notify the user about the updates status.



See (1) How to Connect Bluetooth Devices to Xiaomi Mi TV Box! [Speaker, Headphones, etc.] - YouTube; https://www.youtube.com/watch?v=4ZEDTfqUTTQ.



See How to install Mi Home app on Mi Box S; https://www.youtube.com/watch?v=UPeJSixSS-Q&t=5s.



See Xiaomi Global Home.

1) Smart Device Connections

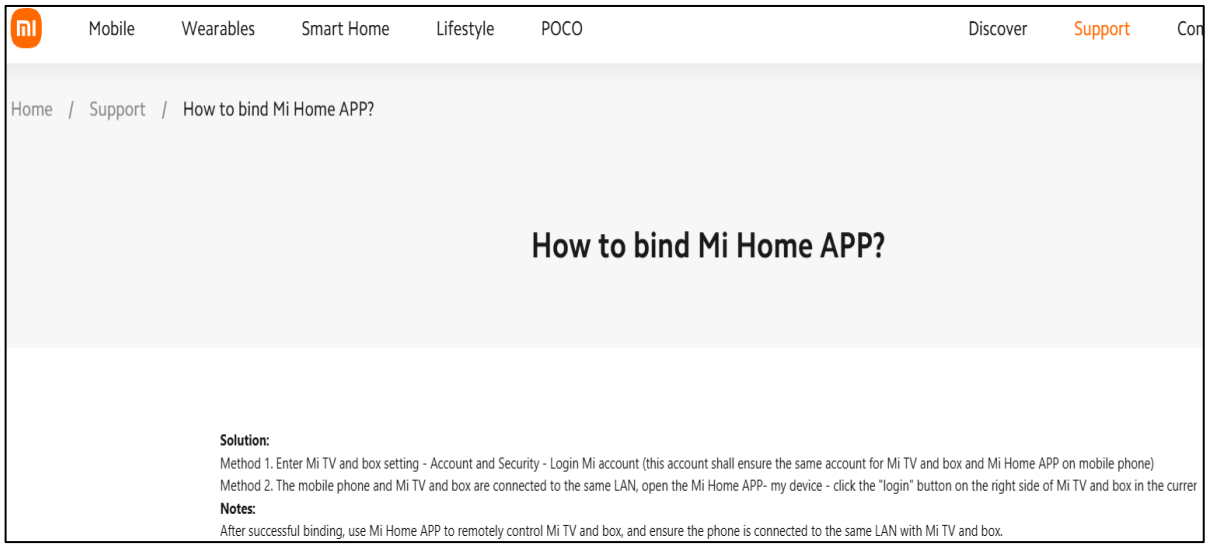
In order to provide you with Xiaomi/Mi Home services and to enable you to securely connect to and manage your smart devices, we will collect your Wi-Fi information, location information, account login information, information related to your mobile phone and smart device, and information associated with your Mi Account and smart device.

This information will be used to provide you with various functionalities, including pairing with and connecting to smart devices, discovering nearby devices, and device management. Specific examples involving the above information are set out below:

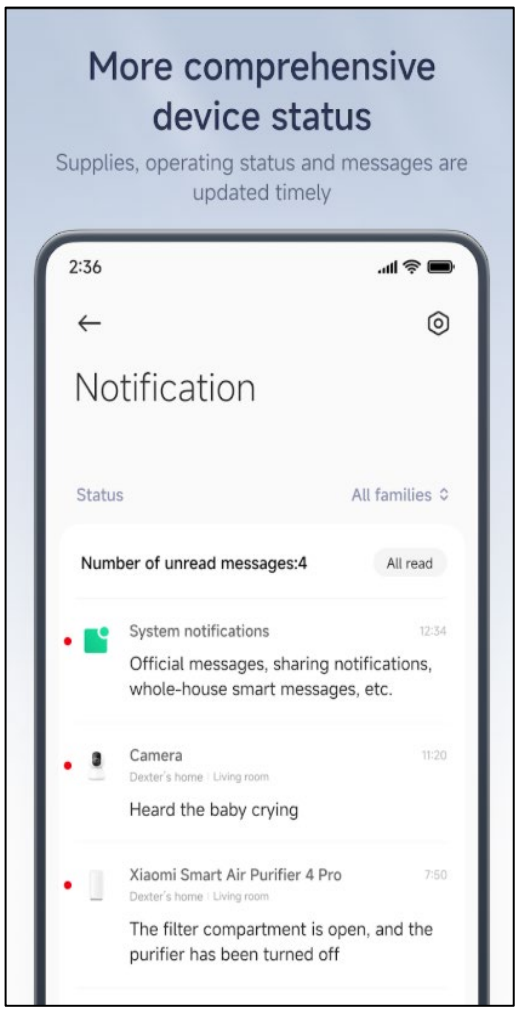
- Smart devices connected via Wi-Fi: Wi-Fi Information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and device ID.
- After establishing a local connection via Bluetooth, smart devices connected via Wi-Fi: Wi-Fi information (SSID, BSSID, MAC address of Wi-Fi, Wi-Fi password), MAC address of the device, and MAC address of Bluetooth on the device.
- Smart devices connected via Bluetooth: MAC address of Bluetooth on the device, and device ID.
- Smart devices connected via Zigbee: MAC address of the device, and device ID.

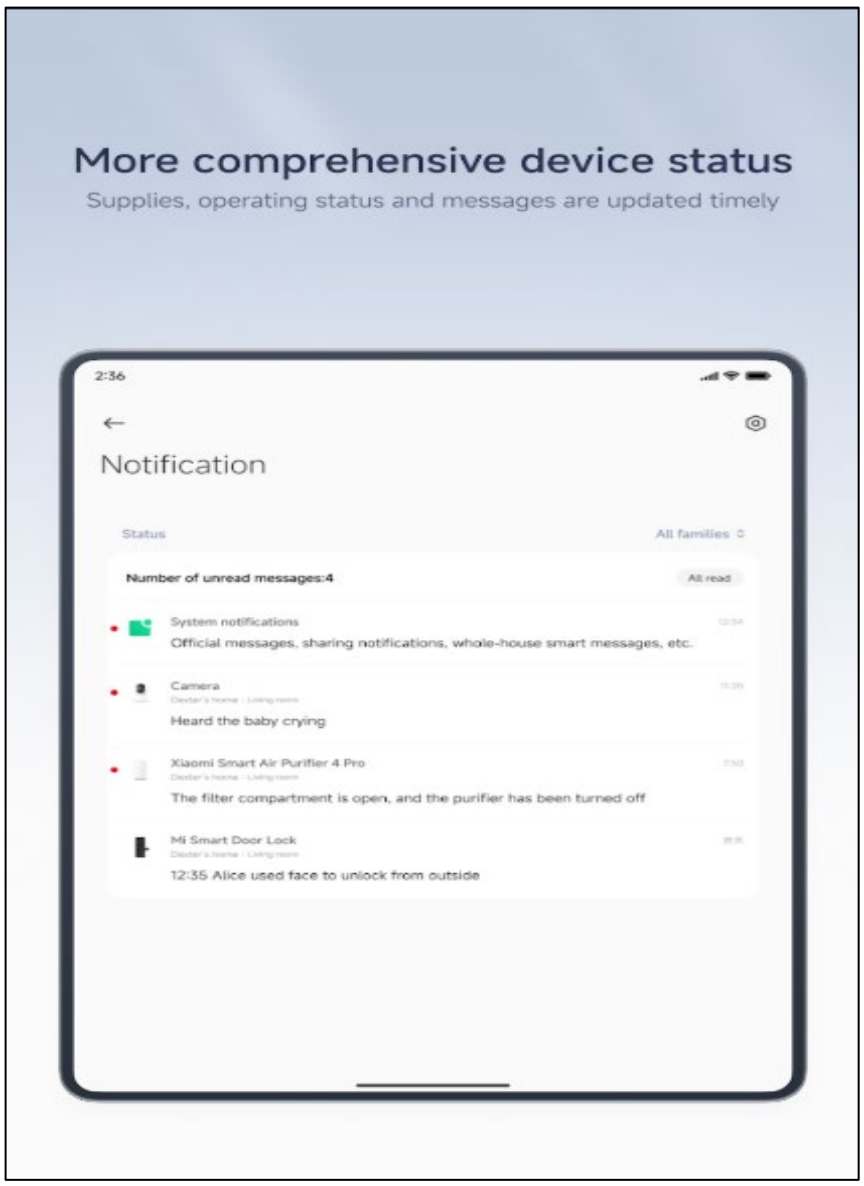
See 3.6 Xiaomi/Mi Home And Privacy.

90. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising wherein the message about the updated status (*e.g.*, online/offline status or connected/disconnected status) is communicated to the cellular phone (*e.g.*, on the Mi Home/Xiaomi Home application).



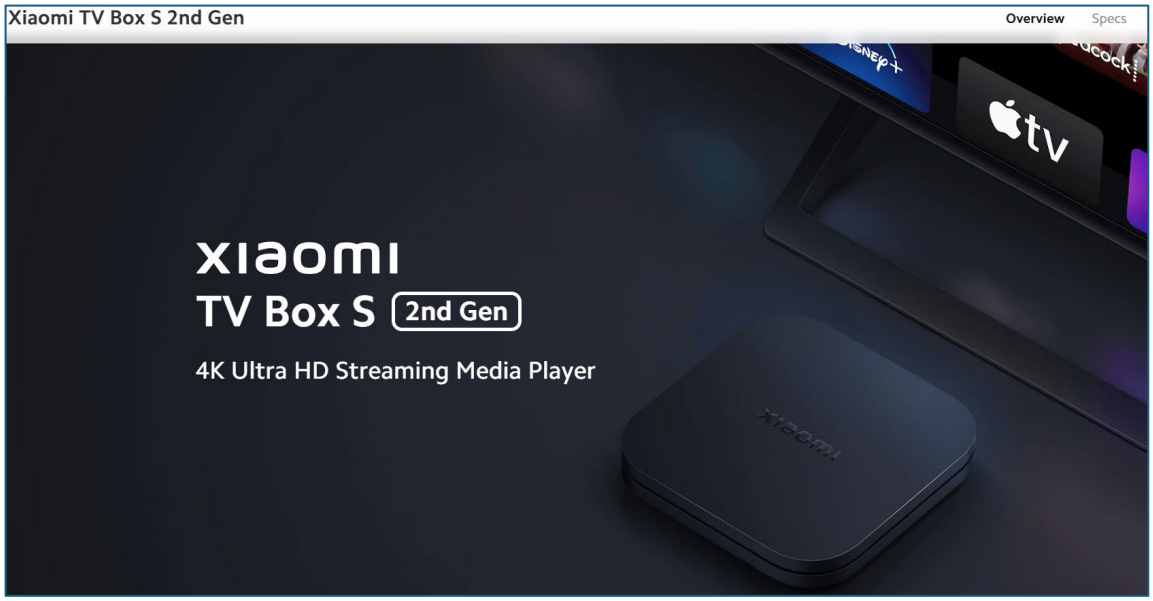
See https://www.mi.com/global/support/article/KA-06321/.


More comprehensive device status
Supplies, operating status and messages are updated timely
2:36
Notification
Status
All families
Number of unread messages:4
All read
System notifications
12:34
Official messages, sharing notifications, whole-house smart messages, etc.
Camera
11:20
Dexter's home | Living room
Heard the baby crying
Xiaomi Smart Air Purifier 4 Pro
7:50
Dexter's home | Living room
The filter compartment is open, and the purifier has been turned off

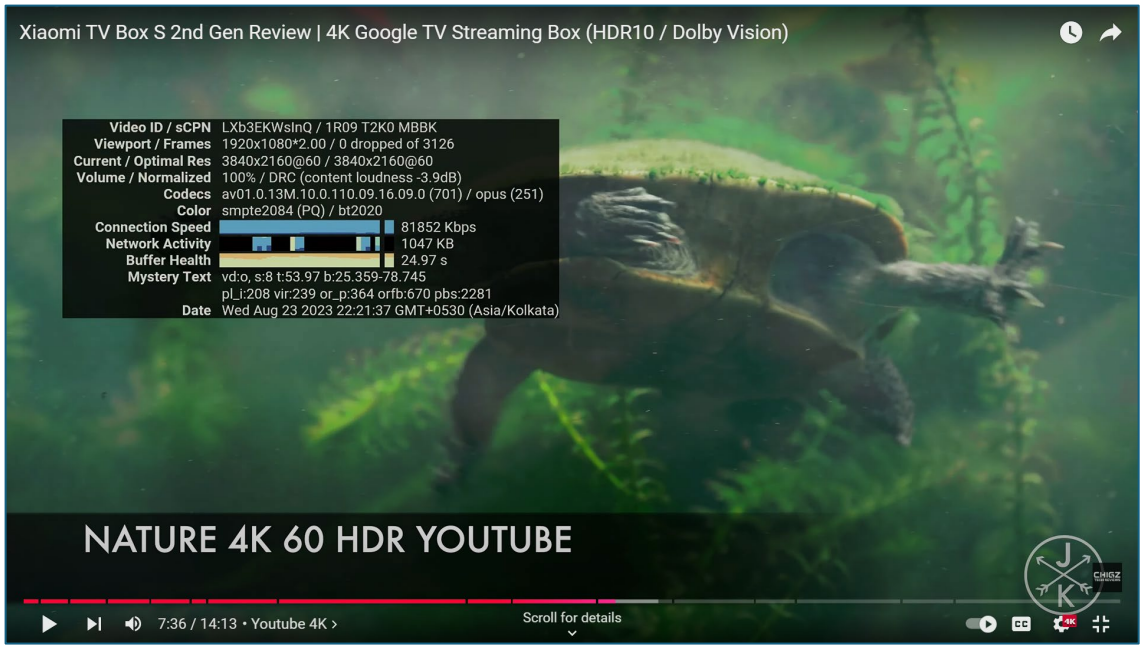


See Mi Home - Apps on Google Play; https://play.google.com/store/apps/details?id=com.xiaomi.smarthome&hl=en-US.

91. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising wherein the method further comprising receiving a signal (*e.g.*, video, audio, etc. for streaming) from the wireless local area network.



See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/.



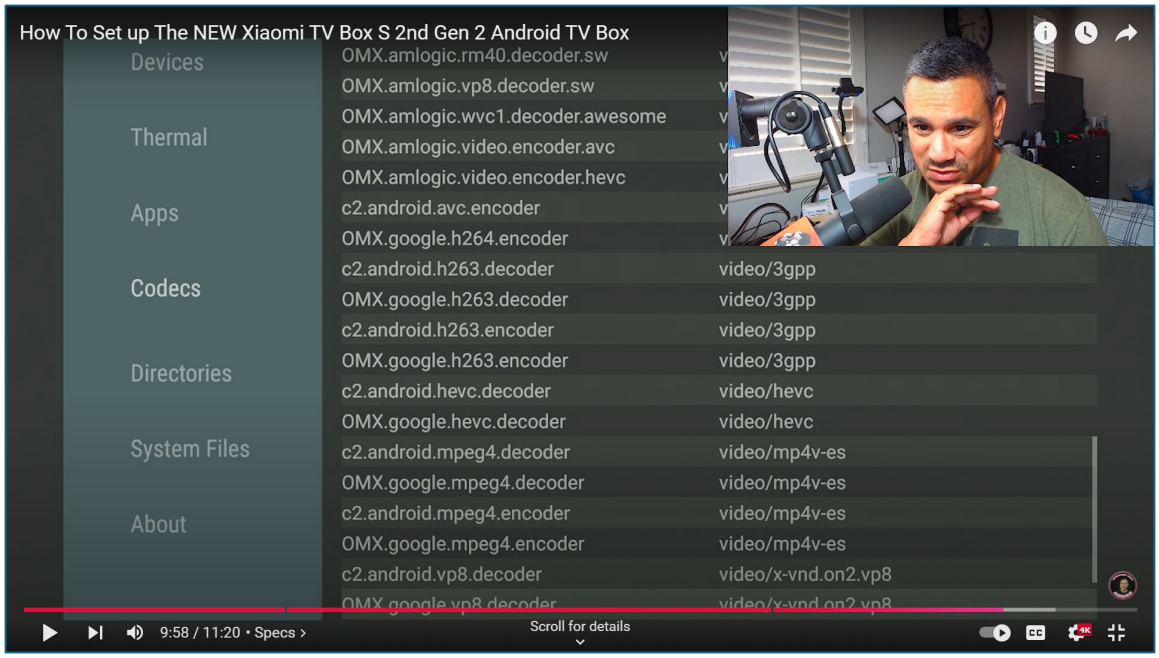
See https://www.youtube.com/watch?v=ht97YiL86o0.

92. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising performing a conversion of the signal by a converter (*e.g.*, codecs) to accommodate production of a corresponding information content, the signal comprising a compressed signal.

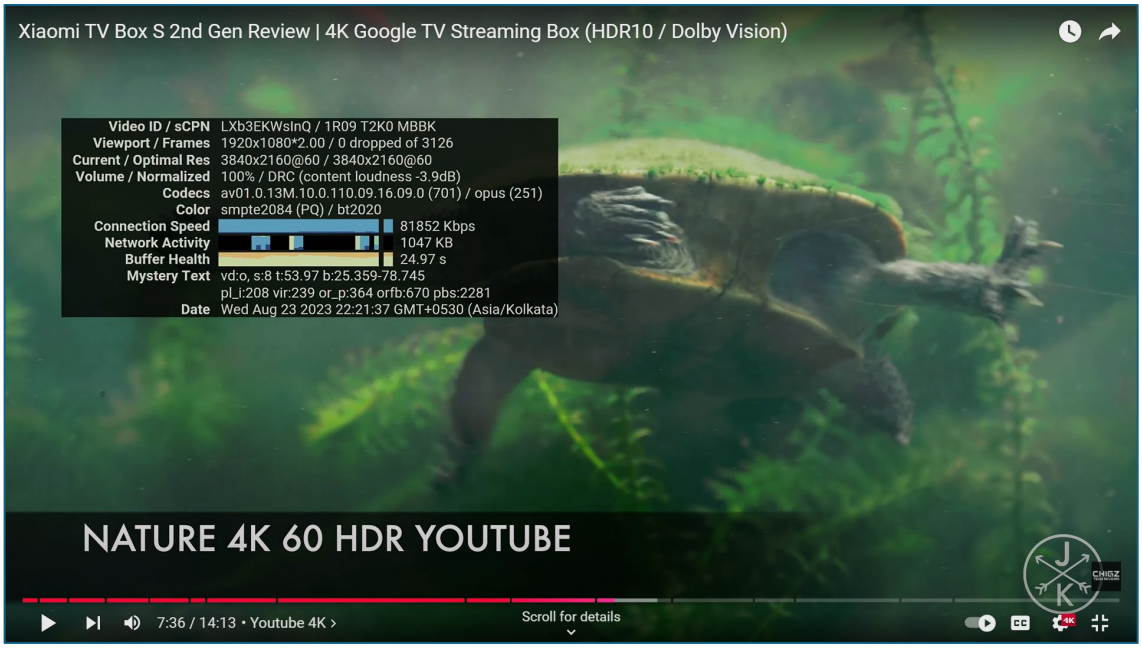
Xiaomi TV Box S 2nd Gen

Wireless connectivity	Wi-Fi:	2.4GHz/ 5GHz
	Bluetooth:	5.2
Decoder	Video decoder:	Up to 4K 60FPS
		Supports Dolby Audio® and DTS-HD
		Supports Dolby Vision®
		Supports HDR10+
	Support language:	Global

See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



See https://www.youtube.com/watch?v=ul3XvLzMGww.



See https://www.youtube.com/watch?v=ht97YiL86o0.

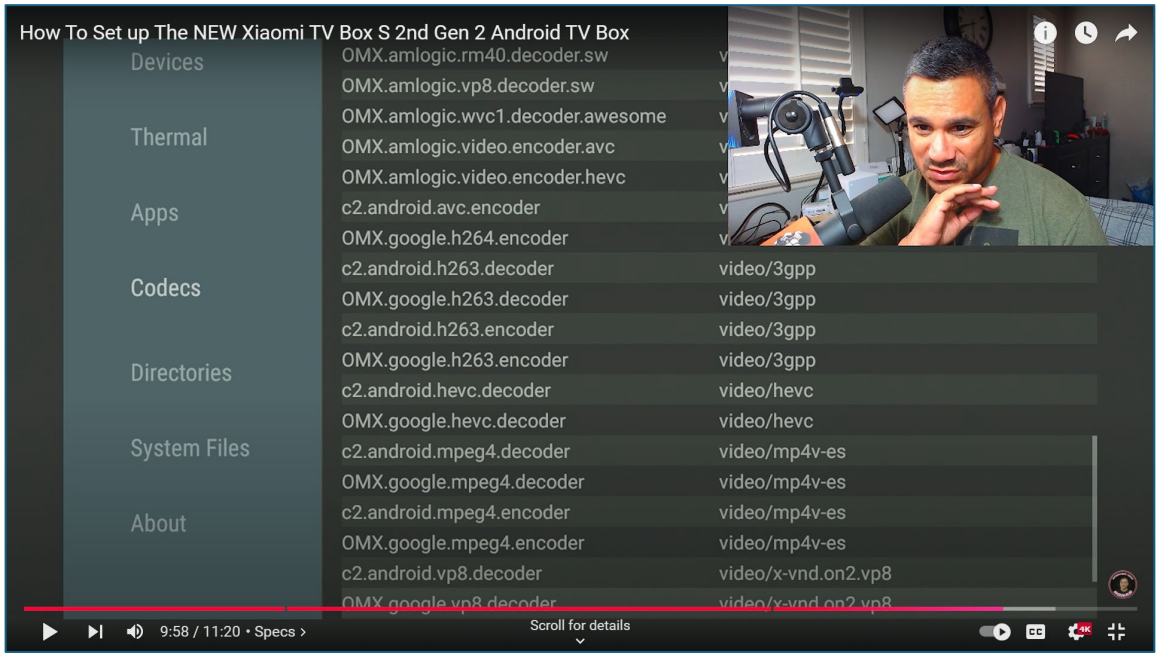
93. On information and belief, one or more components of the Xiaomi Products and Services provides a method for communicating information by a centralized HUB system with a device identifier comprising decompressing (*e.g.*, Xiaomi TV Box decompresses) the compressed

signal by a decoder (*e.g.*, codecs), the conversion comprising said decompressing the compressed signal by the decoder, the decoder included in the converter.

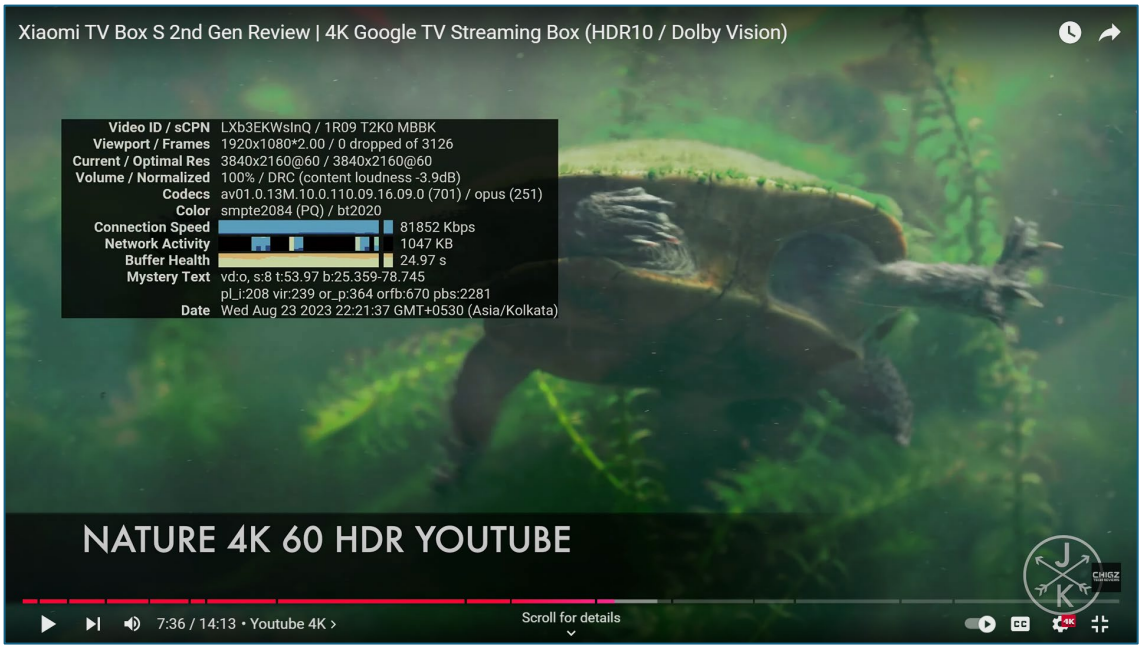
Xiaomi TV Box S 2nd Gen

Wireless connectivity	Wi-Fi:	2.4GHz/ 5GHz
	Bluetooth:	5.2
Decoder	Video decoder:	Up to 4K 60FPS
		Supports Dolby Audio® and DTS-HD
		Supports Dolby Vision®
		Supports HDR10+
	Support language:	Global

See https://www.mi.com/us/product/xiaomi-tv-box-s-2nd-gen/specs.



See https://www.youtube.com/watch?v=ul3XvLzMGww.



See https://www.youtube.com/watch?v=ht97YiL86o0.

94. On information and belief, Xiaomi directly infringes at least claim 10 of the ’898 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Xiaomi Products and Services.

95. Innovation Sciences has been damaged by Defendants’ infringement and has caused / continues to cause it to suffer irreparable harm and damages as a result of the infringement.

JURY DEMANDED

96. Pursuant to Federal Rule of Civil Procedure 38(b), Innovation Sciences hereby requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Innovation Sciences respectfully requests this Court to enter judgment in its favor and against Defendants as follows:

a. finding that Xiaomi has infringed one or more claims of the ’179 patent under 35 U.S.C. §§ 271(a);

b. finding that Xiaomi has infringed one or more claims of the '125 patent under 35 U.S.C. §§ 271(a);

c. finding that Xiaomi has infringed one or more claims of the '898 patent under 35 U.S.C. §§ 271(a);

d. awarding Innovation Sciences damages under 35 U.S.C. § 284, or otherwise permitted by law, including supplemental damages for any continued post-verdict infringement;

e. awarding Innovation Sciences pre-judgment and post-judgment interest on the damages award and costs;

f. declaring that Xiaomi has willfully infringed one or more claims of the Patents-in-Suit;

g. awarding cost of this action (including all disbursements) and attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by the law; and,

h. awarding such other costs and further relief that the Court determines to be just and equitable.

Dated: March 14, 2025

Respectfully submitted,

By: */s/ Raymond W. Mort, III*

Raymond W. Mort, III (Texas Bar No. 00791308)
THE MORT LAW FIRM
111 Congress Avenue, Suite 500
Austin, Texas 78701
Tel/Fax: 512-865-7950
raymort@austinlaw.com

Attorney for Plaintiff Innovation Sciences, LLC