

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

<b>DH HOLDINGS, LLC, an Illinois</b>	)	
<b>Limited Liability Company</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	
	)	
<b>MERIDIANLINK, INC., a Foreign</b>	)	
<b>Corporation d/b/a INSIGHT LENDING</b>	)	
<b>SOLUTIONS,</b>	)	
	)	
<b>Defendant.</b>	)	

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, DH Holdings, LLC, an Illinois limited liability company, (hereafter “DH Holdings”), by counsel, Joseph J. Zaknoen and Edward G. Zaknoen of Zaknoen & Zaknoen LLC, complains of Defendant, MeridianLink, Inc., d/b/a Insight Lending Solutions, (hereafter “MeridianLink”), as follows:

**PARTIES**

1. Plaintiff DH Holdings, is a limited liability company organized and existing under the laws of the State of Illinois, with a principal office at 11109 Richland Valley Drive, Great Falls, Virginia.
2. Defendant MeridianLink, is, upon information and belief, a corporation organized and existing under the laws of the State of California, with a principal office at 1124 Bristol Street, Costa Mesa, California 92626. Upon information and belief, MeridianLink, Inc., also does business as Insight Lending Solutions. Upon information

and belief, MeridianLink's registered agent for service of process is Timothy Nguyen, 1124 Bristol Street, Costa Mesa, California 92626.

3. Upon information and belief, Defendant owns and operates a website, [www.pricemyloan.com](http://www.pricemyloan.com), which is designed for use by mortgage lenders, originators, and others to process loan applications over the internet, including mortgage lenders, originators, and others in the State of Illinois.

4. MeridianLink transacts business in this judicial district and has committed acts of infringement in this judicial district, at least by operating said website and conducting business over said website which are accessible to residents of Illinois.

#### **JURISDICTION AND VENUE**

5. This is a claim for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of this case under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant because Defendant has committed and continues to commit and/or has contributed or continues to contribute to acts of patent infringement in this district.

7. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b).

#### **FACTUAL ALLEGATIONS**

8. DH Holdings is the owner of United States Patent No. 6,438,526 issued on August 20, 2002 ("the '526 Patent"), entitled SYSTEM AND METHOD FOR TRANSMITTING AND PROCESSING LOAN DATA. A true and correct copy of the '526 Patent is attached as exhibit A.

9. DH Holdings has the exclusive right to license and to enforce the '526 Patent and to collect all damages for infringement. DH Holdings also has standing to sue for infringement of the '526 Patent.

10. The '526 Patent is valid and enforceable having been duly issued by the United States Patent and Trademark Office.

11. MeridianLink has infringed, and continues to infringe, claims of the '526 Patent by, among other activities, operating the [www.pricemyloan.com](http://www.pricemyloan.com) website, which is a system and method for transmitting and processing loan information as claimed in the '526 Patent. MeridianLink also has infringed the '526 Patent by knowingly and actively inducing others to infringe, and by contributing to the infringement of others by encouraging others to use its [www.pricemyloan.com](http://www.pricemyloan.com) website and by intentionally aiding, assisting and encouraging the infringement of others through the aforementioned means.

12. Defendant MeridianLink's infringement, contributory infringement and inducement to infringe has injured Plaintiff DH Holdings and it is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

13. Upon information and belief, Defendant's infringement is deliberate, willful and wanton.

**WHEREFORE**, Plaintiff DH Holdings respectfully requests this Court enter judgment against Defendant MeridianLink and against its subsidiaries, successors, parents, affiliates, officers, directors, agents, servants, employees, and all persons in active concert or participation with them, granting the following relief:

A. The entry of judgment in favor of Plaintiff, and against Defendant;

- B. An award of damages adequate to compensate Plaintiff for the infringement that has occurred, together with prejudgment interest from the date the infringement began, but in no event less than a reasonable royalty as permitted under 35 U.S.C. § 284;
- C. An award to Plaintiff of three times its damages to compensate Plaintiff under 35 U.S.C. § 284;
- D. A finding that this case is exceptional and award to Plaintiff its attorneys' fees and costs as provided by 35 U.S.C. § 285;
- E. A permanent injunction prohibiting further infringement, inducement and/or contributory infringement of the '526 Patent; and
- F. Such other relief to which Plaintiff is entitled to under law and any other and further relief that this Court or a jury may deem just and proper.

**JURY DEMAND**

Plaintiff hereby requests a trial by jury of all issues so triable.

Respectfully submitted,

s/ Joseph J. Zaknoen

s/ Edward G. Zaknoen  
Zaknoen & Zaknoen LLC  
Attorneys for Plaintiff DH Holdings.

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