

1 located in Palo Alto, California. Defendant uses, sells, and/or offers to sell products and services
2 in interstate commerce that infringe the '159 Patent.

3 **SUBJECT MATTER JURISDICTION**

4 4. This court has original jurisdiction over the subject matter of this action, pursuant
5 to 28 U.S.C. §§ 1331 and 1338(a), because this action involves a federal question relating to
6 patents.

7 **PERSONAL JURISDICTION**

8 5. The court has general *in personam* jurisdiction over Defendant because Defendant
9 is found in this state.

10 **VENUE**

11 6. Venue is proper in this court, pursuant to 28 U.S.C. § 1400(b), because Defendant
12 has committed acts of infringement in this district and has a regular and established place of
13 business in this district.

14 **COUNT I**
15 **PATENT INFRINGEMENT**

16 7. Plaintiff repeats and re-alleges paragraphs 2 through 6 by reference, as if fully set
17 forth herein.

18 8. On September 24, 2013, the United States Patent & Trademark Office (USPTO)
19 duly and legally issued the '159 Patent, entitled "Method for Providing Mobile Service Using
20 Code Pattern." A true and authentic copy of the '159 Patent is attached hereto as **Exhibit "A"**
21 and incorporated herein by reference.

22 9. The '159 Patent teaches a method and apparatus for providing a mobile service
23 with the use of code pattern.

24 10. The '159 Patent is directed to computerized decoding technologies to provide
25

1 users with access to and use of various content more conveniently. Traditionally, companies
2 simply provided their URL information to the consuming public, but this is effective only if a
3 consumer memorized the name and spelling of the URL. Thus, there was a need in the art to
4 provide an effective product or method to assist consumers with recalling website or URL
5 information.

6 11. The '159 Patent claims, among other things, a method of providing content with
7 the use of code pattern by a user terminal; a user terminal for providing content with the use of
8 code pattern; a non-transitory machine-readable storage medium having encoded thereon
9 program code; and, a method of providing content with the use of an image captured by a user
10 terminal.

11 12. Collectively, the claimed embodiments in the '159 Patent provide new solutions
12 to problems related to transmitting information from a mobile service provider to a mobile
13 device.

14 13. The '159 Patent solves a problem with the art that is rooted in computer
15 technology that uses mobile service providers. The '159 Patent does not merely recite the
16 performance of some business practice known from the pre-Internet world along with the
17 requirement to perform it on the Internet.

18 14. Plaintiff is the assignee of the entire right, title, and interest in the '159 Patent at
19 the USPTO, including the right to assert causes of action arising under the '159 Patent.

20 15. Upon information and belief, Defendant has and continues to directly infringe,
21 contributorily infringe, or actively induce the infringement of the '159 Patent by making, using
22 (including by at least internally testing the Accused Products as defined herein), selling, offering
23 for sale, importing in the United States, including this judicial district, a user terminal designed
24
25

1 to capture certain code pattern information and convert same into embedded content, which
2 embodies or uses the invention claimed in the ‘159 Patent (the “Accused Products”), all in
3 violation of 35 U.S.C. § 271.

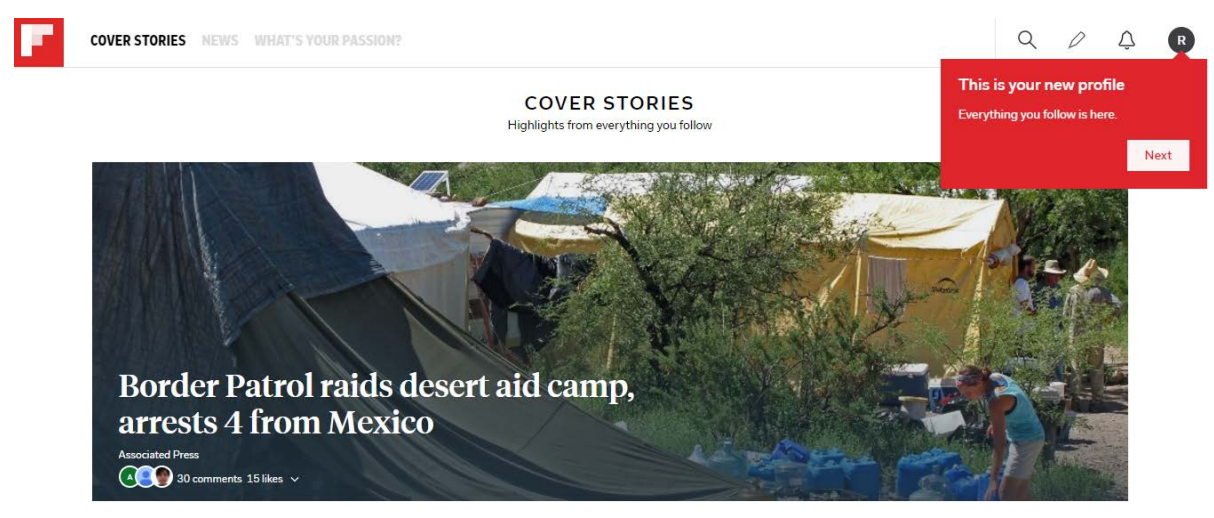
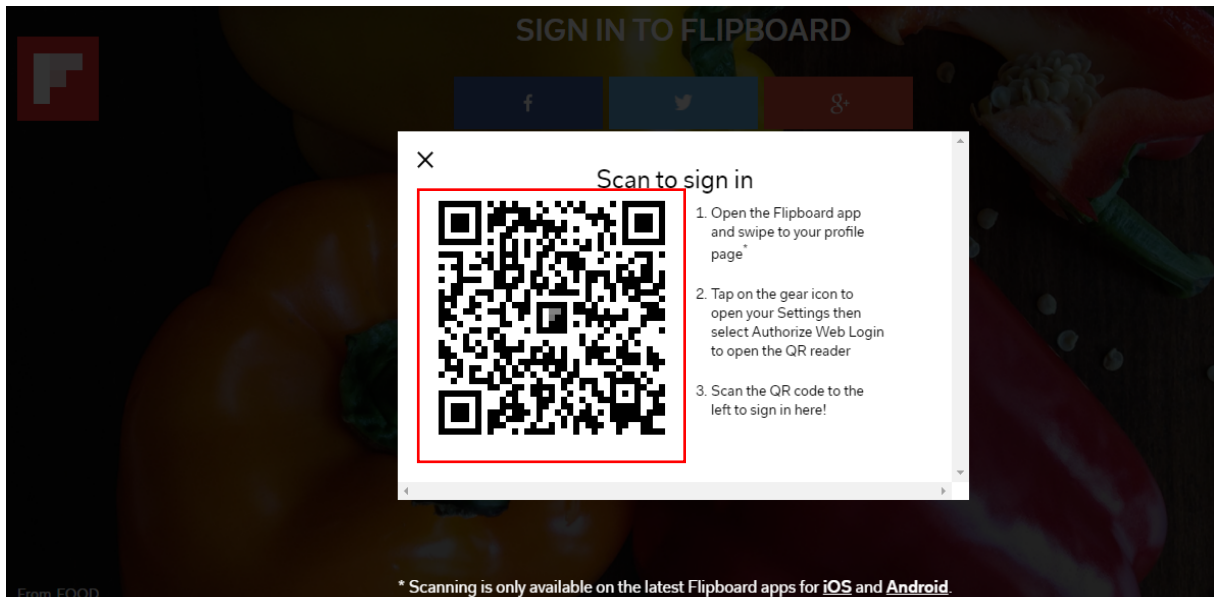
4 16. The Accused Products infringe at least claims 1, 2, 15, and 16 of the ‘159 Patent.

5 *Claim 1*

6 17. Through claim 1, the ‘159 Patent claims a method of providing content with the
7 use of a code pattern by a user terminal, the method comprising: obtaining a photographic image
8 of a code pattern by a camera of the user terminal; processing, by a processor of the user
9 terminal, the photographic image of the code pattern to extract the code pattern from the
10 photographic image; decoding the extracted code pattern by the processor of the user terminal
11 into code information; transmitting a content information request message to a server based on
12 the code information; and receiving content information from the server in response to the
13 content information request message.
14

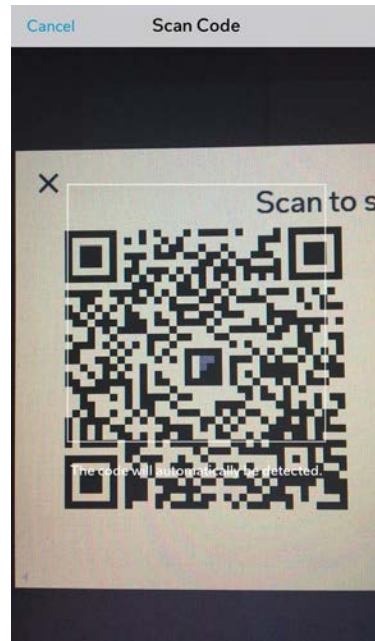
15 18. Defendant infringes claim 1.

16 19. Defendant, at least in internal use and testing, practices a method of providing
17 content (*e.g.*, a web page associated with the defendant) with the use of a code pattern (*e.g.*, a QR
18 code) by a user terminal (*e.g.*, a smartphone), as demonstrated in the following images:
19
20
21
22
23
24
25



20. Defendant, at least in internal use and testing, obtains a photographic image of a code pattern (e.g., QR code) by a camera of the user terminal (e.g., smartphone), as shown below:


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25



21. Defendant, at least in internal use and testing, processes by a processor of the user terminal (*e.g.*, smartphone), the photographic image of the code pattern (*e.g.*, QR code) to view and extract the code pattern from the photographic image, as shown below:

iPhone 7 Overview

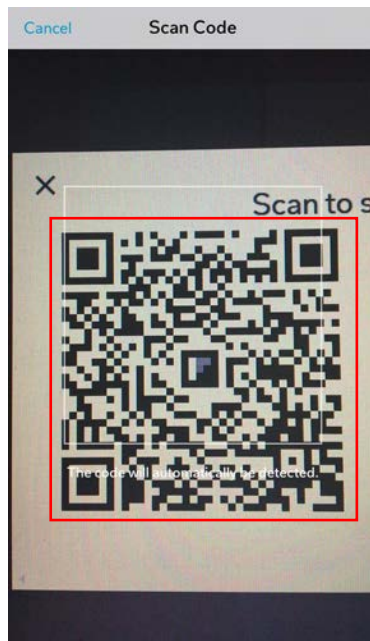
Chip



A10 Fusion chip with 64-bit architecture

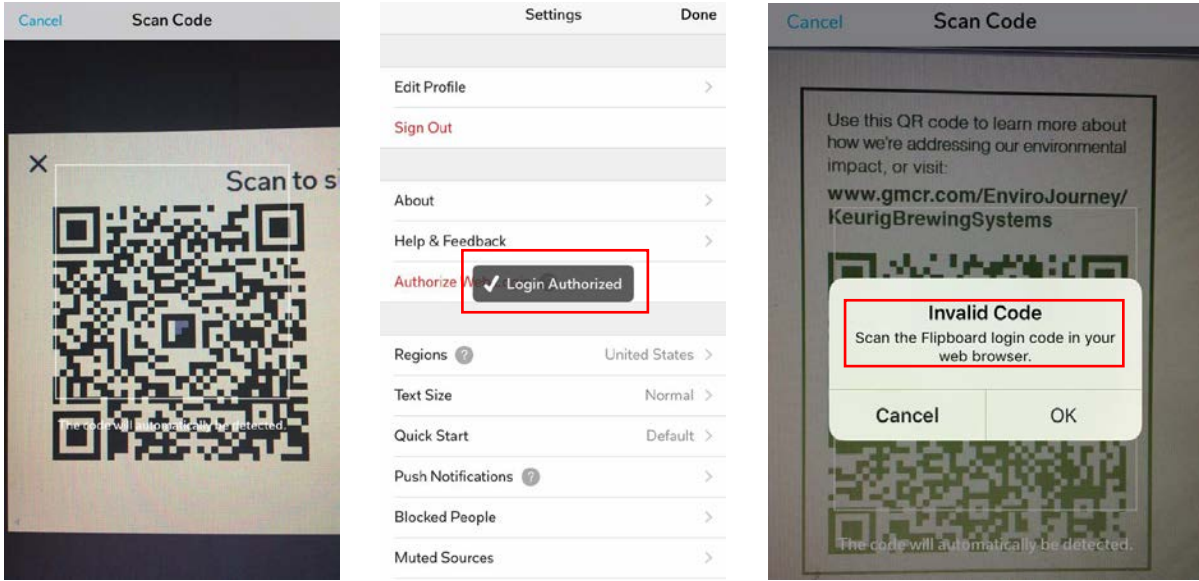
Embedded M10 motion coprocessor

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

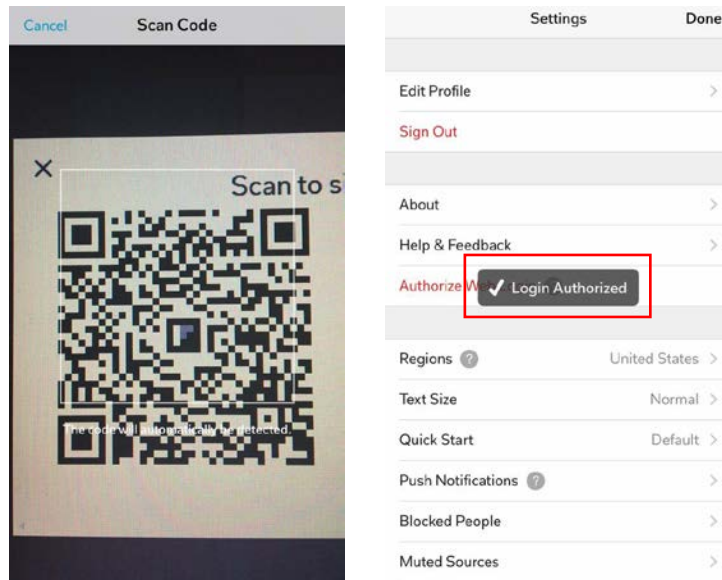


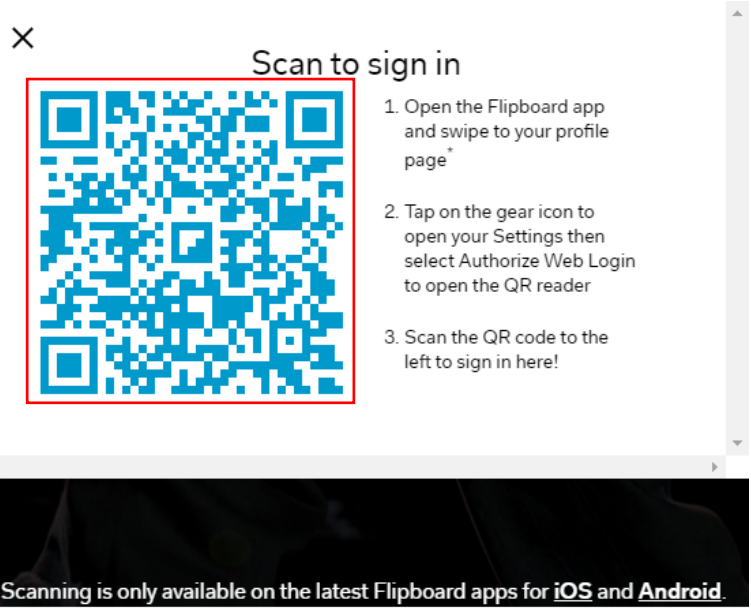
22. Defendant, at least in internal use and testing, decodes the extracted code pattern by the processor of the user terminal from the QR code into code information (e.g., URL of web page associated with the defendant), as shown below:





23. Defendant, at least in internal use and testing, transmits a content information request message (e.g., http request message for accessing the webpage associated with Defendant) to a server (e.g., Defendant's server) based on the code information (e.g., URL of the webpage associated with Defendant). As shown below, once the URL is decoded from the extracted QR code, a request for accessing a webpage associated with Defendant is sent to Defendant's server.





24. Defendant, at least in internal use and testing, receives content information (e.g., a

1 web page associated with Defendant) from the server (e.g., Defendant's server) in response to
2 the content information request message (e.g., http request message for accessing the webpage
3 associate with Defendant). The terminal (e.g., smartphone) receives content information (e.g.,
4 webpage associated with Defendant).

5 **Claim 2**

6 25. Through claim 2, the '159 Patent claims the method of claim 1, wherein the
7 content information comprises at least one of the following: image, sound, moving picture, and
8 text data.

9 26. Defendant infringes claim 2.

10 27. Defendant uses a user terminal to receive content information that comprises
11 image and text data, as shown below:
12



20 **Claim 15**

21 28. Through claim 15, the '159 Patent claims a non-transitory machine-readable
22 storage medium, having encoded thereon program code, wherein, when the program code is
23 executed by a machine, the machine implements a method for providing content with the use of a
24 code pattern by a user terminal, comprising the steps of: obtaining a photographic image of a
25 code pattern by a camera of the user terminal; processing, by a processor of the user terminal, the

WATSON LLP

189 S. Orange Avenue, Suite 810
Orlando, FL 32801
Tel: (407) 377-6634 / Fax: (407) 377-6688

1 photographic image of the code pattern to extract the code pattern from the photographic image;
2 decoding the extracted code pattern by the processor of the user terminal into code information;
3 transmitting a content information request message to a server based on the code information;
4 and receiving content information from the server in response to the content information request
5 message.

6 29. Defendant infringes claim 15.

7 30. Defendant, at least in internal use and testing, practices a method of providing
8 content (*e.g.*, a webpage associated with Defendant) with the use of a code pattern (*e.g.*, a QR
9 code) by a user terminal (*e.g.*, a smartphone).

10 31. Defendant, at least in internal use and testing, obtains a photographic image of a
11 code pattern (*e.g.*, QR code) by a camera of the user terminal (*e.g.*, smartphone).

12 32. Defendant, at least in internal use and testing, uses a processor of the user
13 terminal (*e.g.*, smartphone) to processes the photographic image of the code pattern (*e.g.*, QR
14 code) to extract the code pattern from the photographic image.

15 33. Defendant, at least in internal use and testing, decodes the extracted code pattern
16 by the processor of the user terminal into code information (*e.g.*, URL of web page associated
17 with Defendant).

18 34. Defendant, at least in internal use and testing, transmits and receives a content
19 information request message (*e.g.*, http request message for accessing the webpage associated
20 with Defendant) to and from a server (*e.g.*, Defendant's server) based on the code information
21 (*e.g.*, URL of the webpage associated with Defendant).
22
23

24 ***Claim 16***

25 35. Through claim 16, the '159 Patent claims a method of providing content with the

1 use of an image captured by a user terminal, the method comprising: obtaining a photographic
2 image by a camera of the user terminal; processing, by a processor of the user terminal, the
3 photographic image to extract characteristic information from the photographic image;
4 transmitting a content information request message with the extracted characteristic information
5 to a server; and receiving content information from the server in response to the content
6 information request message.

7 36. Defendant infringes claim 16.

8 37. Defendant, at least in internal use and testing, practices a method of providing
9 content (*e.g.*, a webpage associated with Defendant) with the use of a code pattern (*e.g.*, a QR
10 code) by a user terminal (*e.g.*, a smartphone).

11 38. Defendant, at least in internal use and testing, obtains a photographic image of a
12 code pattern (*e.g.*, QR code) by a camera of the user terminal (*e.g.*, smartphone).

13 39. Defendant, at least in internal use and testing, processes by a processor of the user
14 terminal (*e.g.*, smartphone), the photographic image of the code pattern (*e.g.*, QR code) to extract
15 characteristic information from the photographic image.

16 40. Defendant, at least in internal use and testing, transmits and receives a content
17 information request message (*e.g.*, http request message for accessing the webpage associated
18 with Defendant) to or from a server (*e.g.*, Defendant's server) based on the extracted
19 characteristic information (*e.g.*, URL of the webpage associated with Defendant).

20 41. Upon information and belief, Defendant has known of the existence of the '159
21 Patent, and its acts of infringement have been willful and in disregard for the '159 Patent,
22 without any reasonable basis for believing that it had a right to engage in the infringing conduct.
23

24 42. Defendant's acts of infringement of the '159 Patent have caused and will continue
25

1 to cause Plaintiff damages for which Plaintiff is entitled to compensation pursuant to 35 U.S.C. §
2 284.

3 43. Defendant's acts of infringement of the '159 Patent have caused and will continue
4 to cause Plaintiff immediate and irreparable harm unless such infringing activities are also
5 enjoined by this court pursuant to 35 U.S.C. § 283. Plaintiff has no adequate remedy at law.

6 44. Upon information and belief, the '159 Patent, at all times material, was and is in
7 compliance with 35 U.S.C. § 287.

8 45. Plaintiff retained the law firm of WATSON LLP to represent its interests in this
9 action, and is obligated to pay such firm reasonable attorneys' fees for its services. Plaintiff may
10 recover its attorneys' fees and costs from Defendant, pursuant to 35 U.S.C. § 285, because this
11 case is exceptional.
12

13 **WHEREFORE**, Plaintiff, CODING TECHNOLOGIES, LLC, demands judgment
14 against Defendant, FLIPBOARD, INC., and respectfully seeks the entry of an order (i) adjudging
15 that Defendant has infringed the '159 Patent, in violation of 35 U.S.C. § 271; (ii) granting an
16 injunction enjoining Defendant, its employees, agents, officers, directors, attorneys, successors,
17 affiliates, subsidiaries and assigns, and all of those in active concert and participation with any of
18 the foregoing persons or entities from infringing, contributing to the infringement of, or inducing
19 infringement of the '159 Patent; (iii) ordering Defendant to account and pay damages adequate to
20 compensate Plaintiff for Defendant's infringement of the '159 Patent, with pre-judgment and
21 post-judgment interest and costs, pursuant to 35 U.S.C. § 284; (iv) ordering that the damages
22 award be increased up to three times the actual amount assessed, pursuant to 35 U.S.C. § 284; (v)
23 declaring this case exceptional and awarding Plaintiff its reasonable attorneys' fees, pursuant to
24
25

WATSON LLP

189 S. Orange Avenue, Suite 810
Orlando, FL 32801
Tel: (407) 377-6634 / Fax: (407) 377-6688

1 35 U.S.C. § 285; and, (vi) awarding such other and further relief as this court deems just and
2 proper.

3
4 **DATED** on October 11, 2017

5
6 Respectfully submitted,

7 /s/ Coleman Watson

8 **Coleman W. Watson, Esq.**

9 Florida Bar. No. 0087288

10 California Bar No. 266015

11 Georgia Bar No. 317133

12 New York Bar No. 4850004

13 Email: coleman@watsonllp.com

14 docketing@watsonllp.com

15 **WATSON LLP**

16 189 S. Orange Avenue

17 Suite 810

18 Orlando, FL 32801

19 Tel: (407) 377-6634 / Fax: (407) 377-6688

20 *Attorneys for Plaintiff,*

21 CODING TECHNOLOGIES, INC.

22
23
24
25 **WATSON LLP**

189 S. Orange Avenue, Suite 810

Orlando, FL 32801

Tel: (407) 377-6634 / Fax: (407) 377-6688