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CLERK US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA FLORIDA

FILED

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

CODING TECHNOLOGIES, LLC,

Plaintiff,

vs.

RTG FURNITURE CORP.;
ROOMSTOGO.COM INC.,

Defendants.

Case No.: 8:17cv2403 T36 AEP

COMPLAINT

INJUNCTIVE RELIEF DEMANDED

JURY TRIAL DEMANDED

Plaintiff, CODING TECHNOLOGIES, LLC, sues Defendants, RTG FURNITURE
CORP. and ROOMSTOGO.COM INC., and alleges as follows:

NATURE OF THE ACTION

1. This is an action for infringement of United States Patent No. 8,540,159
under the Patent Act, 35 U.S.C. § 271, *et seq.*, based on Defendants' unauthorized
commercial manufacture, use, importation, offer for sale, and sale of infringing products
and services in the United States.

PARTIES

2. Plaintiff, CODING TECHNOLOGIES, LLC, is a foreign limited liability

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\$400

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company, organized under the laws of the State of Texas.

3. Defendant, RTG FURNITURE CORP., is a domestic corporation with its headquarters located in Tampa, Florida. Defendant uses, sells, and/or offers to sell products and services in interstate commerce that infringe the '159 Patent.

4. Defendant, ROOMSTOGO.COM INC., is a domestic corporation with its headquarters located in Tampa, Florida. Defendant uses, sells, and/or offers to sell products and services in interstate commerce that infringe the '159 Patent.

SUBJECT MATTER JURISDICTION

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

PERSONAL JURISDICTION

6. The court has general *in personam* jurisdiction over Defendants because Defendants are citizens of the State of Florida and are found in this state.

VENUE

7. Venue is proper in this court, pursuant to 28 U.S.C. § 1400(b), because Defendants reside in this judicial district, have committed acts of infringement in this district, and have a regular and established place of business in this district.

COUNT I
PATENT INFRINGEMENT

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

9. On September 24, 2013, the United States Patent & Trademark Office

1
2 (USPTO) duly and legally issued the '159 Patent, entitled "Method for Providing Mobile
3 Service Using Code Pattern." A true and authentic copy of the '159 Patent is attached
4 hereto as **Exhibit "A"** and incorporated herein by reference.

5 10. The '159 Patent teaches a method and apparatus for providing a mobile
6 service with the use of code pattern.

7 11. The '159 Patent is directed to computerized decoding technologies to
8 provide users with access to and use of various content more conveniently. Traditionally,
9 companies simply provided their URL information to the consuming public, but this is
10 effective only if a consumer memorized the name and spelling of the URL. Thus, there
11 was a need in the art to provide an effective product or method to assist consumers with
12 recalling website or URL information.

13 12. The '159 Patent claims, among other things, a method of providing
14 content with the use of code pattern by a user terminal; a user terminal for providing
15 content with the use of code pattern; a non-transitory machine-readable storage medium
16 having encoded thereon program code; and, a method of providing content with the use
17 of an image captured by a user terminal.

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

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

3 15. Plaintiff is the assignee of the entire right, title, and interest in the '159
4 Patent at the USPTO, including the right to assert causes of action arising under the '159
5 Patent.

6 16. Upon information and belief, Defendants have and continue to directly
7 infringe, contributorily infringe, or actively induce the infringement of the '159 Patent by
8 making, using (including by at least internally testing the Accused Products as defined
9 herein), selling, offering for sale, importing in the United States, including this judicial
10 district, a user terminal designed to capture certain code pattern information and convert
11 same into embedded content, which embodies or uses the invention claimed in the '159
12 Patent (the "Accused Products"), all in violation of 35 U.S.C. § 271.

13 17. The Accused Products infringe at least claims 1, 2, 3, 8, 9, 10, 15, and 16
14 of the '159 Patent.

15
16 *Claim 1*

17 18. Through claim 1, the '159 Patent claims a method of providing content
18 with the use of a code pattern by a user terminal, the method comprising: obtaining a
19 photographic image of a code pattern by a camera of the user terminal; processing, by a
20 processor of the user terminal, the photographic image of the code pattern to extract the
21 code pattern from the photographic image; decoding the extracted code pattern by the
22 processor of the user terminal into code information; transmitting a content information
23 request message to a server based on the code information; and receiving content
24 information from the server in response to the content information request message.
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19. Defendants infringe claim 1.

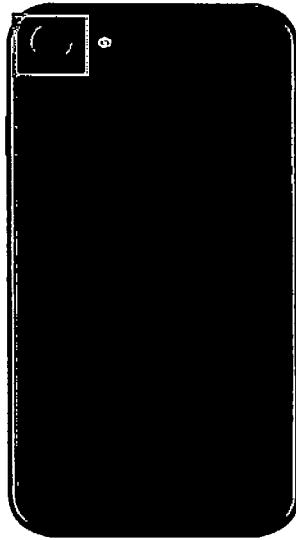
20. Defendants, at least in internal use and testing, practice a method of providing content (e.g., a web page associated with Defendants) with the use of a code pattern (e.g., a QR code) by a user terminal (e.g., a smartphone), as demonstrated in the following images:



21. Defendants, at least in internal use and testing, obtain a photographic image of a code pattern (e.g., QR code) by a camera of the user terminal (e.g.,

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smartphone), as shown below:



22. Defendants, at least in internal use and testing, process 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

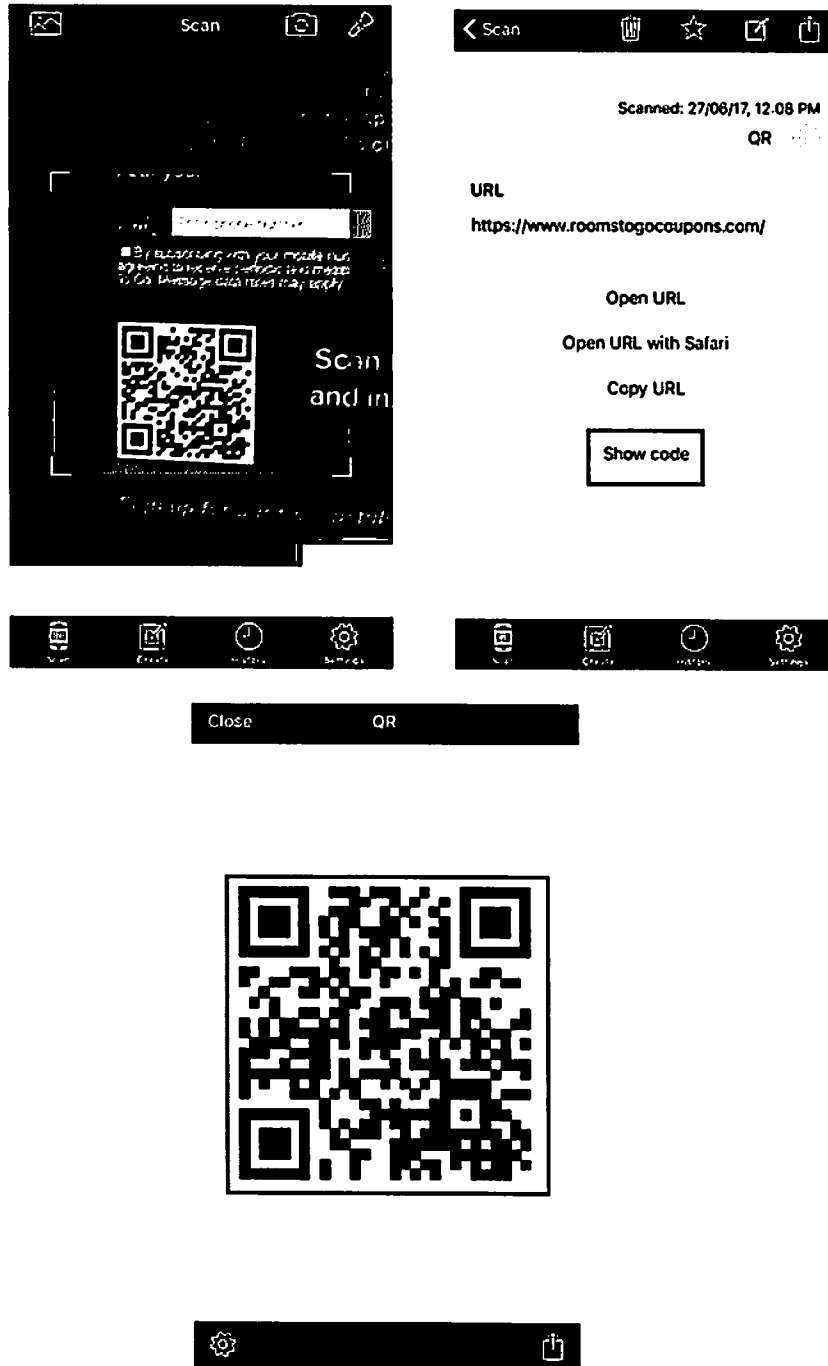
Overview

Chip



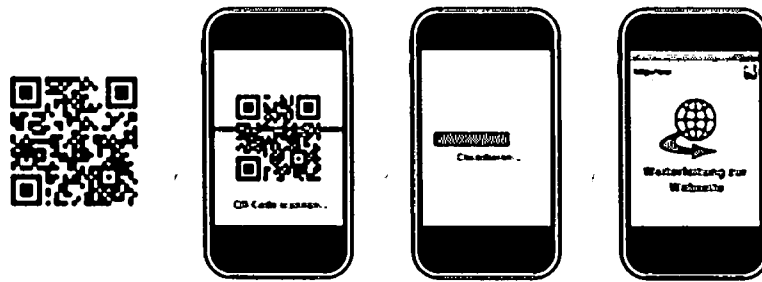
A10 Fusion chip with 64-bit architecture
Embedded M10 motion coprocessor

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23. Defendants, at least in internal use and testing, decode 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 Defendants), as shown below:

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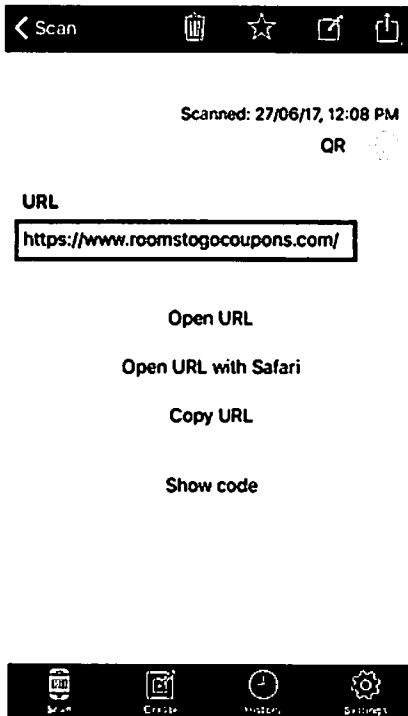


QR-Code

Scan

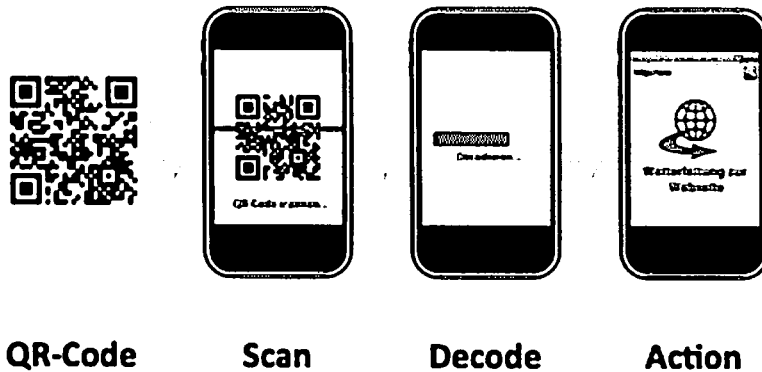
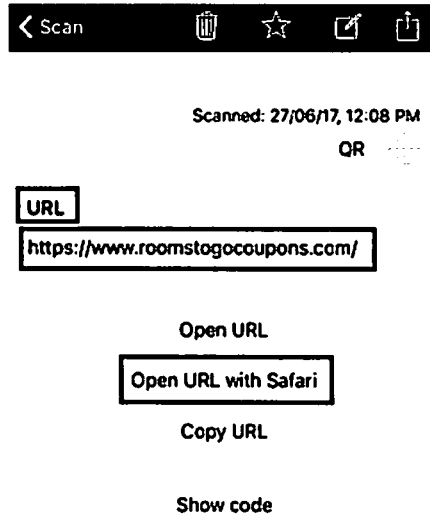
Decode

Action



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

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2 associated with Defendants is sent to Defendants' server.



25. Defendants, at least in internal use and testing, receives content information (e.g., a web page associated with Defendants) from the server (e.g., Defendants' server) in response to the content information request message (e.g., http request message for accessing the webpage associate with Defendants). As shown below,

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the terminal (e.g., smartphone) receives content information (e.g., webpage associated with Defendants).



QR-Code Scan Decode Action



Claim 2

26. Through claim 2, the '159 Patent claims the method of claim 1, wherein the content information comprises at least one of the following: image, sound, moving

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2 picture, and text data.

3 27. Defendants infringe claim 2.

4 28. Defendants use a user terminal to receive content information that
5 comprises image and text data, as shown below:



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18 **Claim 3**

19 29. Through claim 3, the '159 Patent claims the method of claim 1, wherein
20 the transmitting a content information request message includes: extracting a uniform
21 resource locator (URL) of the server from the code information; and transmitting the
22 content information request message to the server based on the extracted URL.

23 30. Defendants infringe claim 3.

24 31. Defendants transmit a content information request message (e.g., http
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2 request message for accessing the webpage associate with Defendants) which includes
3 extracting URL of the server and transmitting the content information request message
4 (*e.g.*, http request message for accessing the webpage associate with Defendants) to the
5 server (*e.g.*, Defendants' server) based on the extracted URL.

6 ***Claim 8***

7 32. Through claim 8, the '159 Patent claims a user terminal for providing
8 content with the use of a code pattern, the user terminal comprising: a camera configured
9 to obtain a photographic image of a code pattern; a processor comprising: an image
10 processor configured to process the photographic image of the code pattern to extract the
11 code pattern from the photographic image; and a decoder configured to decode the
12 extracted code pattern into code information; and a transceiver configured to (i) transmit
13 a content information request message to a server based on the code information; and (ii)
14 receive content information from the server in response to the content information request
15 message.
16

17 33. Defendants infringe claim 8.

18 34. Defendants, at least in internal use and testing, uses a user terminal (*e.g.*,
19 smartphone) for providing content (*e.g.*, a web page associated with Defendants) with the
20 use of a code pattern (*e.g.*, QR code).

21 35. Defendants use a user terminal comprising a camera configured to obtain a
22 photographic image of a code pattern (*e.g.*, QR code).

23 36. Defendants use a user terminal comprising a processor which in turn
24 comprises an image processor configured to process the photographic image of the code
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pattern (*e.g.*, QR code) to extract the code pattern (*e.g.*, QR code) from the photographic image. Once the photographic image of the QR code is captured by the camera of the smartphone, the photographic image is processed to retrieve the QR code. The retrieved QR code can be viewed on the user interface screen of the smartphone.

37. Defendants use a user terminal (*e.g.*, smartphone) comprising a decoder that is configured to decode the extracted code pattern (*e.g.*, QR code) into code information (*e.g.*, URL of web page associated with Defendants).

38. Defendants use a user terminal comprising a transceiver (*e.g.*, FDD-LTE/TDD -LTE/CDMA/EDGE transceiver) which is configured to transmit or receive a content information request message (*e.g.*, http request message for accessing the webpage associated with Defendants) to a server (*e.g.*, Defendants' server) based on the code information (*e.g.*, URL of the webpage associated with Defendants). As shown below, once the URL is decoded from the extracted QR code, a request or response for accessing a webpage associated with Defendants is sent to Defendants' server by means of transceiver of the smartphone:

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iPhone 7

Overview iOS Tech Specs Buy

Cellular and Wireless

Model A1660*
Model A1661*

FDD-LTE (Bands 1, 2, 3, 4, 5, 7, 8, 12, 13, 17, 18, 19, 20, 25, 26, 27, 28, 29, 30)
TD-LTE (Bands 38, 39, 40, 41)
TD-SCDMA 1900 (F), 2000 (A)
CDMA EV-DO Rev. A (800, 1900, 2100 MHz)
UMTS/HSPA+/DC-HSDPA (850, 900, 1700/2100, 1900, 2100 MHz)
GSM/EDGE (850, 900, 1800, 1900 MHz)

Model A1778*
Model A1784*

Models A1778 and A1784 do not support CDMA networks, such as those used by Verizon and Sprint.

FDD-LTE (Bands 1, 2, 3, 4, 5, 7, 8, 12, 13, 17, 18, 19, 20, 25, 26, 27, 28, 29, 30)
TD-LTE (Bands 38, 39, 40, 41)
UMTS/HSPA+/DC-HSDPA (850, 900, 1700/2100, 1900, 2100 MHz)
GSM/EDGE (850, 900, 1800, 1900 MHz)



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QR

URL

<https://www.roomstogocoupons.com/>

Open URL

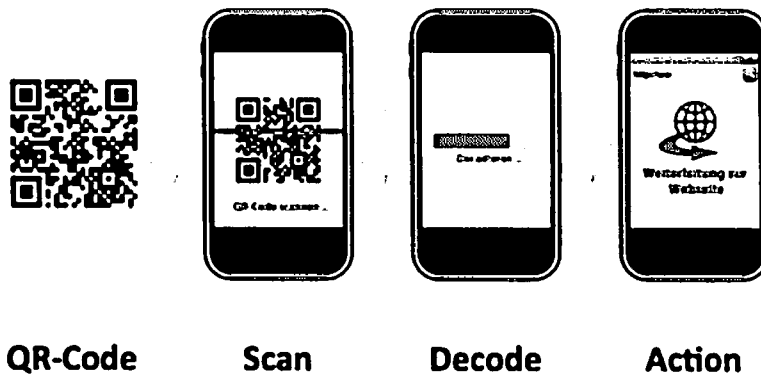
Open URL with Safari

Copy URL

Show code



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Claim 9

39. Through claim 9, the '159 Patent claims the user terminal of claim 8, wherein the content information comprises at least one of the following: image, sound, moving picture, and text data.

40. Defendants infringe claim 9.

41. Defendants use a user terminal to receive content information that comprises image and text data.

Claim 10

42. Through claim 10, the '159 Patent claims the user terminal of claim 8, wherein: the processor is further configured to extract a uniform resource locator (URL) of the server from the code information; and the transceiver is further configured to transmit the content information request message to the server based on the extracted URL.

43. Defendants infringe claim 10.

44. Defendants use a user terminal (*e.g.*, smartphone) that is configured to extract a uniform resource locator (URL) of the server (*e.g.*, Defendants' server) from the

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2 code information (*e.g.*, URL of web page associated with Defendants).

3 45. Defendants use a user terminal (*e.g.*, smartphone) comprising a transceiver
4 configured to transmit the content information request message (*e.g.*, http request
5 message for accessing the webpage associate with Defendants) to the server (*e.g.*,
6 Defendants' server) based on the extracted URL.

7 ***Claim 15***

8 46. Through claim 15, the '159 Patent claims a non-transitory machine-
9 readable storage medium, having encoded thereon program code, wherein, when the
10 program code is executed by a machine, the machine implements a method for providing
11 content with the use of a code pattern by a user terminal, comprising the steps of:
12 obtaining a photographic image of a code pattern by a camera of the user terminal;
13 processing, by a processor of the user terminal, the photographic image of the code
14 pattern to extract the code pattern from the photographic image; decoding the extracted
15 code pattern by the processor of the user terminal into code information; transmitting a
16 content information request message to a server based on the code information; and
17 receiving content information from the server in response to the content information
18 request message.
19

20 47. Defendants infringe claim 15.

21 48. Defendants, at least in internal use and testing, practice a method of
22 providing content (*e.g.*, a webpage associated with Defendants) with the use of a code
23 pattern (*e.g.*, a QR code) by a user terminal (*e.g.*, a smartphone).

24 49. Defendants, at least in internal use and testing, obtain a photographic
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2 image of a code pattern (*e.g.*, QR code) by a camera of the user terminal (*e.g.*,
3 smartphone).

4 50. Defendants, at least in internal use and testing, use a processor of the user
5 terminal (*e.g.*, smartphone) to processes the photographic image of the code pattern (*e.g.*,
6 QR code) to extract the code pattern from the photographic image.

7 51. Defendants, at least in internal use and testing, decode the extracted code
8 pattern by the processor of the user terminal into code information (*e.g.*, URL of web
9 page associated with Defendants).

10 52. Defendants, at least in internal use and testing, transmit and receive a
11 content information request message (*e.g.*, http request message for accessing the
12 webpage associated with Defendants) to and from a server (*e.g.*, Defendants' server)
13 based on the code information (*e.g.*, URL of the webpage associated with Defendants).
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15 ***Claim 16***

16 53. Through claim 16, the '159 Patent claims a method of providing content
17 with the use of an image captured by a user terminal, the method comprising: obtaining a
18 photographic image by a camera of the user terminal; processing, by a processor of the
19 user terminal, the photographic image to extract characteristic information from the
20 photographic image; transmitting a content information request message with the
21 extracted characteristic information to a server; and receiving content information from
22 the server in response to the content information request message.

23 54. Defendants infringe claim 16.

24 55. Defendants, at least in internal use and testing, practice a method of
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2 providing content (*e.g.*, a webpage associated with Defendants) with the use of a code
3 pattern (*e.g.*, a QR code) by a user terminal (*e.g.*, a smartphone).

4 56. Defendants, at least in internal use and testing, obtain a photographic
5 image of a code pattern (*e.g.*, QR code) by a camera of the user terminal (*e.g.*,
6 smartphone).

7 57. Defendants, at least in internal use and testing, processes by a processor of
8 the user terminal (*e.g.*, smartphone), the photographic image of the code pattern (*e.g.*, QR
9 code) to extract characteristic information from the photographic image.

10 58. Defendants, at least in internal use and testing, transmit and receive a
11 content information request message (*e.g.*, http request message for accessing the
12 webpage associated with Defendants) to or from a server (*e.g.*, Defendants' server) based
13 on the extracted characteristic information (*e.g.*, URL of the webpage associated with
14 Defendants).

15 59. Upon information and belief, Defendants have known of the existence of
16 the '159 Patent, and its acts of infringement have been willful and in disregard for the
17 '159 Patent, without any reasonable basis for believing that it had a right to engage in the
18 infringing conduct.

19 60. Defendants' acts of infringement of the '159 Patent have caused and will
20 continue to cause Plaintiff damages for which Plaintiff is entitled to compensation
21 pursuant to 35 U.S.C. § 284.

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

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

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

10 **WHEREFORE**, Plaintiff, CODING TECHNOLOGIES, LLC, demands
11 judgment against Defendants, RTG FURNITURE CORP. and ROOMSTOGO.COM
12 INC., and respectfully seeks the entry of an order (i) adjudging that Defendants have
13 infringed the '159 Patent, in violation of 35 U.S.C. § 271; (ii) granting an injunction
14 enjoining Defendants, their employees, agents, officers, directors, attorneys, successors,
15 affiliates, subsidiaries and assigns, and all of those in active concert and participation
16 with any of the foregoing persons or entities from infringing, contributing to the
17 infringement of, or inducing infringement of the '159 Patent; (iii) ordering Defendants to
18 account and pay damages adequate to compensate Plaintiff for Defendants' infringement
19 of the '159 Patent, with pre-judgment and post-judgment interest and costs, pursuant to
20 35 U.S.C. § 284; (iv) ordering that the damages award be increased up to three times the
21 actual amount assessed, pursuant to 35 U.S.C. § 284; (v) declaring this case exceptional
22 and awarding Plaintiff its reasonable attorneys' fees, pursuant to 35 U.S.C. § 285; and,
23 (vi) awarding such other and further relief as this court deems just and proper.
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DATED on October 10, 2017

Respectfully submitted,
[Signature]
/s/

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