

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

CODING TECHNOLOGIES, LLC,	§	
	§	
Plaintiff,	§	Case No.: _____
	§	
vs.	§	
	§	<b>COMPLAINT</b>
ASTRAZENECA PHARMACEUTICALS, LP,	§	
	§	<b>INJUNCTIVE RELIEF DEMANDED</b>
	§	
Defendant.	§	<b>JURY TRIAL DEMANDED</b>
	§	
	§	
	§	
	§	
	§	

Plaintiff, CODING TECHNOLOGIES, LLC, sues Defendant, ASTRAZENECA PHARMACEUTICALS, LP, 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 Defendant’s 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 company, organized under the laws of the State of Texas.

3. Defendant, ASTRAZENECA PHARMACEUTICALS, LP, is a domestic limited partnership with its headquarters located in Gaithersburg, Maryland. Defendant uses, sells, and/or offers to sell products and services in interstate commerce that infringe the ‘159 Patent.

**SUBJECT MATTER JURISDICTION**

4. 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**

5. The court has general *in personam* jurisdiction over Defendant because Defendant is a citizen of the State of Delaware and is found in this state.

**VENUE**

6. Venue is proper in this court, pursuant to 28 U.S.C. § 1400(b), because Defendant resides in this judicial district.

**COUNT I**  
**PATENT INFRINGEMENT**

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

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

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

10. The ‘159 Patent is directed to computerized decoding technologies to provide users with access to and use of various content more conveniently. Traditionally, companies simply provided their URL information to the consuming public, but this is effective only if a consumer memorized the name and spelling of the URL. Thus, there was a need in the art to

provide an effective product or method to assist consumers with recalling website or URL information.

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

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

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

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

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

16. The Accused Products infringe at least claims 1, 2, 3, 4, 8, 9, 10, 11, 15, and 16 of the '159 Patent.

***Claim 1***

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

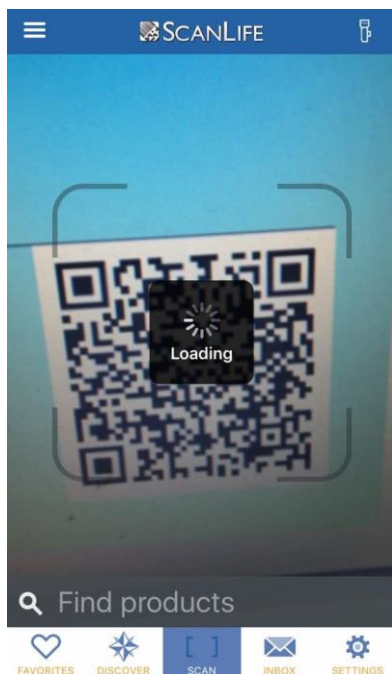
18. Defendant infringes claim 1.

19. Defendant, at least in internal use and testing, practices a method of providing content (*e.g.*, a web page associated with the defendant) 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:

**What's next?**

For more information about the programme and how to apply, please visit our website [www.astrazenecacareers.com/imed-early-talent](http://www.astrazenecacareers.com/imed-early-talent) or use your smartphone to scan the QR code.





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:



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:

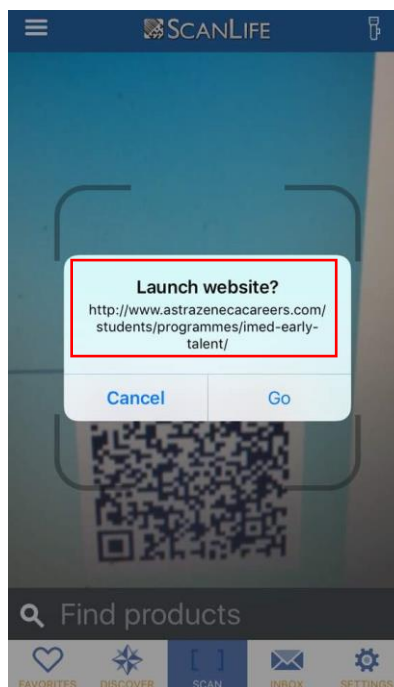
## iPhone 7

Overview

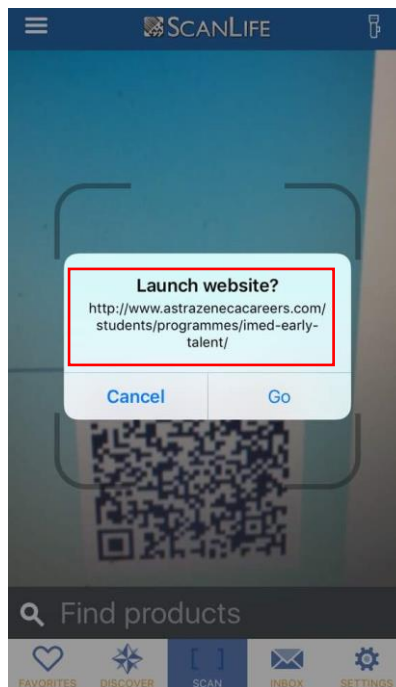
### Chip



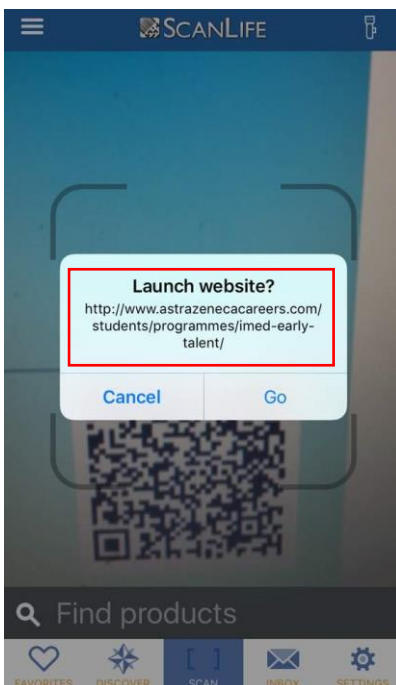
A10 Fusion chip with 64-bit architecture  
Embedded M10 motion coprocessor



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:

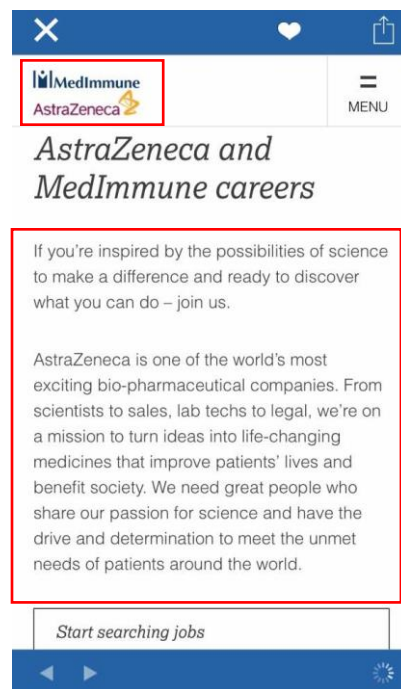
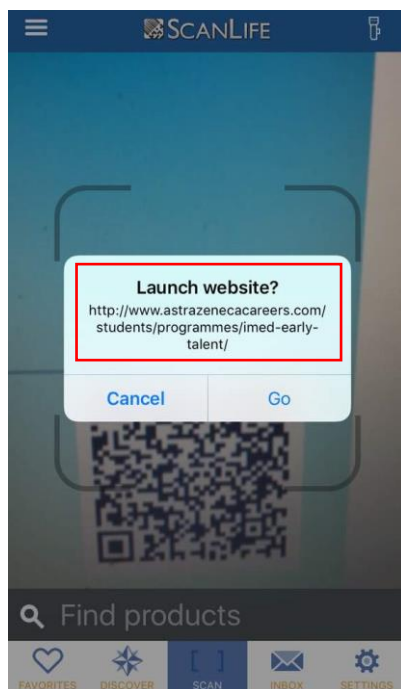


23. Defendant, at least in internal use and testing, transmits a content information request message (e.g., http request message for accessing the webpage associated with Defendant) to a server (e.g., Defendant's server) based on the code information (e.g., URL of the webpage associated with Defendant). 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 web page associated with Defendant) from the server (e.g., Defendant's server) in response to the content information request message (e.g., http request message for accessing the webpage associate with Defendant). As shown below, the terminal (e.g., smartphone) receives content information (e.g., webpage associated with Defendant).



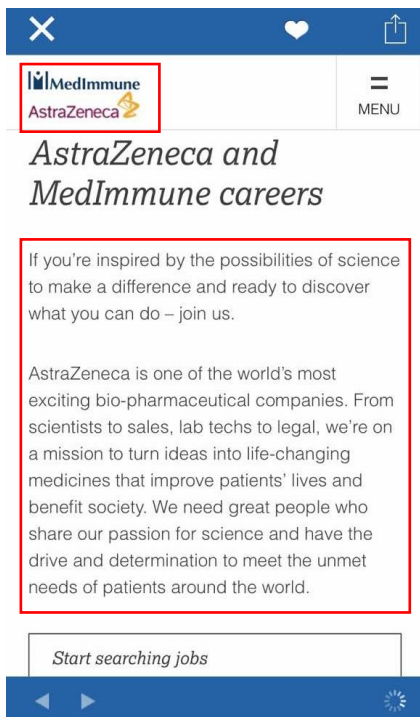


**Claim 2**

25. 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 picture, and text data.

26. Defendant infringes claim 2.

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



### ***Claim 3***

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

29. Defendant infringes claim 3.

30. Defendant transmits a content information request message (*e.g.*, http request message for accessing the webpage associate with Defendant) which includes extracting URL of the server and transmitting the content information request message (*e.g.*, http request message for accessing the webpage associate with Defendant) to the server (*e.g.*, Defendant's server) based on the extracted URL.

### ***Claim 4***

31. Through claim 4, the '159 Patent claims the method of claim 1, wherein the server

includes receiving the content information request message from the user terminal; extracting requested content information from a database based on the content information request message; and transmitting the extracted content information to the user terminal.

32. Defendant infringes claim 4.

33. Defendant, at least in internal use and testing, utilizes a server for receiving the content information request (*e.g.*, http GET request) from a user terminal (*e.g.*, smartphone). As shown in images below a HTTP GET request is sent from a user terminal to an intermediate system to access a certain web page. The intermediate system then transmits the received request to Defendant's web server. The web server responds to the intermediate system that the content is moved permanently along with the updated location of requested content. The intermediate system then sends this information to the user terminal. The mobile terminal further sends a new HTTP GET request to an intermediate system to access a web page located at a new location. The intermediate system again transmits the received request to Defendant's web server.

Time	Source	Destination	Protocol	Length	Info
1112	192.168.1.102	192.168.1.103	TCP	74	8888 → 60054 [SYN, ACK] Seq=0 Ack=1 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1 TSval=21139392 TSecr=472423530
1113	192.168.1.103	192.168.1.102	TCP	66	60054 → 8888 [ACK] Seq=1 Ack=1 Win=131744 Len=0 TSval=472423534 TSecr=21139392
1114	192.168.1.103	192.168.1.102	HTTP	511	GET http://goo.gl/i6EYj HTTP/1.1
1115	192.168.1.102	192.168.1.1	DNS	66	Standard query 0x8936 A goo.gl
1116	192.168.1.102	192.168.1.103	TCP	66	8888 → 60053 [ACK] Seq=1 Ack=340 Win=17152 Len=0 TSval=21139396 TSecr=472423522
1117	192.168.1.102	192.168.1.103	TCP	66	8888 → 60054 [ACK] Seq=1 Ack=446 Win=17152 Len=0 TSval=21139397 TSecr=472423535
1118	192.168.1.1	192.168.1.102	DNS	342	Standard query response 0x030b A app.scanlife.com CNAME dualstack.slapps-700285247.us-east-1.elb.amazonaws.com A...
1119	192.168.1.102	50.17.233.93	TCP	66	63769 → 80 [SYN] Seq=0 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1
1120	fe80::f12b:3cb...	fe80::4a3c:cff:fe6a...	DNS	86	Standard query 0x8936 A goo.gl
1121	192.168.1.1	192.168.1.102	DNS	82	Standard query response 0x8936 A goo.gl A 216.58.199.142
1122	192.168.1.102	216.58.199.142	TCP	66	63770 → 80 [SYN] Seq=0 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1
1123	52.206.193.194	192.168.1.102	TCP	54	443 → 63768 [ACK] Seq=146 Ack=685 Win=20224 Len=0
1124	52.206.193.194	192.168.1.102	TCP	54	443 → 63768 [ACK] Seq=146 Ack=1133 Win=21248 Len=0
1125	52.206.193.194	192.168.1.102	TLSv1.2	1057	Application Data
1126	192.168.1.102	192.168.1.103	TLSv1.2	1069	Application Data
1127	216.58.199.142	192.168.1.102	TCP	66	80 → 63770 [SYN, ACK] Seq=0 Ack=1 Win=42780 Len=0 MSS=1380 SACK_PERM=1 WS=128
1128	192.168.1.102	216.58.199.142	TCP	54	63770 → 80 [ACK] Seq=1 Ack=1 Win=16384 Len=0
1129	192.168.1.102	216.58.199.142	HTTP	480	GET /i6EYj HTTP/1.1
1130	192.168.1.103	192.168.1.102	TCP	66	60052 → 8888 [ACK] Seq=1317 Ack=1256 Win=130496 Len=0 TSval=472423877 TSecr=21139424
1131	192.168.1.102	52.206.193.194	TCP	54	63768 → 443 [ACK] Seq=1133 Ack=1149 Win=15360 Len=0
1132	50.17.233.93	192.168.1.102	TCP	66	80 → 63769 [SYN, ACK] Seq=0 Ack=1 Win=14600 Len=0 MSS=1460 SACK_PERM=1 WS=256
1133	192.168.1.102	50.17.233.93	TCP	54	63769 → 80 [ACK] Seq=1 Ack=1 Win=16384 Len=0
1134	192.168.1.102	50.17.233.93	HTTP	364	GET /scans/code/likecount?barcodevalue=http://goo.gl/i6EYj HTTP/1.1
1135	216.58.199.142	192.168.1.102	TCP	54	80 → 63770 [ACK] Seq=1 Ack=427 Win=43904 Len=0
1136	216.58.199.142	192.168.1.102	TCP	611	[TCP segment of a reassembled PDU]
1137	216.58.199.142	192.168.1.102	HTTP	265	HTTP/1.1 301 Moved Permanently (text/html)
1138	192.168.1.102	216.58.199.142	TCP	54	63770 → 80 [ACK] Seq=427 Ack=769 Win=15616 Len=0
1139	192.168.1.102	192.168.1.103	TCP	623	[TCP segment of a reassembled PDU]
1140	192.168.1.102	192.168.1.103	HTTP	277	HTTP/1.1 301 Moved Permanently (text/html)
1141	192.168.1.103	192.168.1.102	TCP	66	60054 → 8888 [ACK] Seq=446 Ack=558 Win=131200 Len=0 TSval=472424081 TSecr=21139443

Time	Source	Destination	Protocol	Length	Info
1140	192.168.1.102	192.168.1.103	HTTP	277	HTTP/1.1 301 Moved Permanently (text/html)
1141	192.168.1.103	192.168.1.102	TCP	66	60054 → 8888 [ACK] Seq=446 Ack=558 Win=131200 Len=0 TSval=472424081 TSecr=21139443
1142	192.168.1.103	192.168.1.102	TCP	66	60054 → 8888 [ACK] Seq=446 Ack=769 Win=130976 Len=0 TSval=472424081 TSecr=21139443
1143	192.168.1.103	192.168.1.102	TCP	78	60055 → 8888 [SYN] Seq=0 Win=65535 Len=0 MSS=1460 WS=32 TSval=472424114 TSecr=0 SACK_PERM=1
1144	192.168.1.102	192.168.1.103	TCP	74	8888 → 60055 [SYN, ACK] Seq=0 Ack=1 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1 TSval=21139450 TSecr=472424114
1145	192.168.1.103	192.168.1.102	TCP	66	60055 → 8888 [ACK] Seq=1 Ack=1 Win=131744 Len=0 TSval=472424117 TSecr=21139450
1146	192.168.1.103	192.168.1.102	HTTP	322	CONNECT careers.peopleclick.com:443 HTTP/1.1
1147	192.168.1.102	192.168.1.1	DNS	83	Standard query 0xc424 A careers.peopleclick.com
1148	192.168.1.102	192.168.1.103	TCP	66	8888 → 60055 [ACK] Seq=1 Ack=257 Win=17152 Len=0 TSval=21139456 TSecr=472424117
1149	192.168.1.1	192.168.1.102	DNS	180	Standard query response 0xc424 A careers.peopleclick.com CNAME careers.peopleclick.com.edgekey.net CNAME e340.b.akamaie...
1150	192.168.1.102	104.108.214.78	TCP	66	63771 → 443 [SYN] Seq=0 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1
1151	50.17.233.93	192.168.1.102	TCP	54	80 → 63769 [ACK] Seq=1 Ack=311 Win=15872 Len=0
1152	50.17.233.93	192.168.1.102	TCP	594	[TCP segment of a reassembled PDU]
1153	50.17.233.93	192.168.1.102	HTTP/X...	77	HTTP/1.1 200 OK
1154	192.168.1.102	50.17.233.93	TCP	54	63769 → 80 [ACK] Seq=311 Ack=564 Win=15872 Len=0
1155	192.168.1.102	192.168.1.103	TCP	462	[TCP segment of a reassembled PDU]
1156	192.168.1.102	192.168.1.103	TCP	210	[TCP segment of a reassembled PDU]
1157	192.168.1.102	192.168.1.103	HTTP/X...	89	HTTP/1.1 200 OK
1158	192.168.1.103	192.168.1.102	TCP	66	60053 → 8888 [ACK] Seq=340 Ack=397 Win=131360 Len=0 TSval=472424293 TSecr=21139468
1159	192.168.1.103	192.168.1.102	TCP	66	60053 → 8888 [ACK] Seq=340 Ack=541 Win=131200 Len=0 TSval=472424293 TSecr=21139468
1160	192.168.1.103	192.168.1.102	TCP	66	60053 → 8888 [ACK] Seq=340 Ack=564 Win=131200 Len=0 TSval=472424293 TSecr=21139468
1161	74.125.130.189	192.168.1.102	QUIC	97	Payload (Encrypted), PKN: 81
1162	74.125.130.189	192.168.1.102	QUIC	77	Payload (Encrypted), PKN: 70, CID: 6919498545675579682
1163	fe80::4a3c:cff...	fe80::f12b:3cb...	DNS	102	Standard query response 0x8936 A goo.gl A 216.58.199.142
1164	74.125.130.189	192.168.1.102	QUIC	81	Payload (Encrypted), PKN: 57
1165	74.125.130.189	192.168.1.102	QUIC	80	Payload (Encrypted), PKN: 50, CID: 5512713794659032429
1166	90.231.39.189	192.168.1.102	UDP	145	33256 → 32386 Len=103
1167	90.231.39.189	192.168.1.102	UDP	331	32386 → 33256 Len=289
1168	IntelCor_43:b9...	Broadcast	ARP	42	Who has 192.168.1.5? Tell 192.168.1.102
1169	74.125.130.189	192.168.1.102	QUIC	81	Payload (Encrypted), PKN: 58
1170	74.125.130.189	192.168.1.102	QUIC	77	Payload (Encrypted), PKN: 51, CID: 5512713794659032429

```

GET /i6EYj HTTP/1.1
Host: goo.gl
X-NewRelic-ID: VQUPUFNBdHACUFdXDwgBXg==
Connection: keep-alive
Upgrade-Insecure-Requests: 1
s1_webView: TRUE
Accept: text/html,application/xhtml+xml,application/xml;q=0.9,*/*;q=0.8
User-Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 10_3_2 like Mac OS X) AppleWebKit/603.2.4 (KHTML, like Gecko) Mobile/14F89
Accept-Language: en-us
Accept-Encoding: gzip, deflate
Connection: keep-alive

```

```

HTTP/1.1 301 Moved Permanently
Strict-Transport-Security: max-age=63072000; includeSubDomains; preload
Content-Type: text/html; charset=UTF-8
Cache-Control: no-cache, no-store, max-age=0, must-revalidate
Pragma: no-cache
Expires: Mon, 01 Jan 1990 00:00:00 GMT
Date: Wed, 21 Jun 2017 04:24:56 GMT
Location: https://careers.peopleclick.com/careerscp/client_stewartandstevenson/external/search.do
Content-Encoding: gzip
X-Content-Type-Options: nosniff
X-Frame-Options: SAMEORIGIN
X-XSS-Protection: 1; mode=block
Content-Length: 211
Server: GSE

.....m.1..0.....FW..j[+.T$.N....mR.X....n....;...5k.,.u....k..5.H.;jp
..0J>.....+Nh..tMx.Y...+,,(..).s.4a
.4.6...wh.w4G...VXY?%.!{...../..
3...I`...<...M.....=q..P.48S`...<KC.w..*~../.b
...

```

```

CONNECT careers.peopleclick.com:443 HTTP/1.1
Host: careers.peopleclick.com
User-Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 10_3_2 like Mac OS X) AppleWebKit/603.2.4 (KHTML, like Gecko) Mobile/14F89
Connection: keep-alive
Proxy-Connection: keep-alive

```

```

HTTP/1.1 200 Connection Established
FiddlerGateway: Direct
StartTime: 21:24:58.514
Connection: close

.....YI..f,fg..c..Z.C...?6..
.j.cmDY...&...+.$.#.
. ....0./.(.'.....=<.5./...u.....careers.peopleclick.com.
.....
.....3t.....http/1.1.http/1.0.....h..d..C.0. ..`d.0#M.%)..XNtl..8.Z.Tm
..A.Y*zt...@...b..W.|.o.D....0.....http/1.1.....DH',.p.t0X.M..00
. ....*H..
.....0~1.0 ..U...US1.0...U.
..Symantec Corporation1.0...U...Symantec Trust Network1/0-..U...&Symantec Class 3 Secure Server CA - G40..
161109000000Z.
171109235959Z0..1.0 ..U...US1.0...U...North Carolina1.0...U...Raleigh1.0...U.
..Peoplefluent, Inc.1.0...U...Engineering1 0...U...careers.peopleclick.com0..0
. ....*H..
.....0..
.....g./..S.....*...].W.....Y$.x.2....U..{...*.....{...Z.S.(.\.eC .p..
>^...t.....U.....l.LZ..T...?..t.f.d.x....l.%..8w.h....j.*;X....P.5;...Qvu.m.I..Cp...
..6.Q;T....C.....K.O....#...~i.(...7Zv.....K.....*...*...S..QK.t.i..F..~{...t0..p0"...U...
0...careers.peopleclick.com0 ..U...0.0...U.....0a..U. .Z0X0V..g....0L0#.+.https://d.symcb.com/
cps0%..+.....0...https://d.symcb.com/rpa0+..U...$0^0 ..U...http://ss.symcb.com/ss.crt0..U.%..0...+.....+.....
0...U.#..0...`_..a.U..C..`*.z.C..0W..+.....K0I0...+.....0...http://ss.symcd.com0&..+.....0...http://ss.symcb.com/
ss.crt0....
+....y.....v.....+z
0. ....hp~...\.=-.....XJz.w....G0E. J..0&....2.,0

```

34. Defendant, at least in internal use and testing, extracts requested content information from a database based on the content information request message. As shown in

images below the server responds to the GET request with HTML content:

```
CONNECT careers.peopleclick.com:443 HTTP/1.1
Host: careers.peopleclick.com
User-Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 10_3_2 like Mac OS X) AppleWebKit/603.2.4 (KHTML, like Gecko) Mobile/14F88
Connection: keep-alive
Proxy-Connection: keep-alive

HTTP/1.1 200 Connection Established
FiddlerGateway: Direct
StartTime: 21:24:58.514
Connection: close

.....YI..f,fG..C..Z.C...?6..
.j.cmDY...&...+.$.#.
.      .0./.(.'.....=<.5./...u.....careers.peopleclick.com.
.....
.....3t.....http/1.1.http/1.0.....h...d..C.0.  ..`d.0#M.%)...XNt1..8.Z.Tm
..A.Y*zt...@...b..W.|.o.D.....0.....http/1.1.....0.....).....0.....0.....DH`...p.t0X.M...0
.      *.H..
.....0~1.0  ..U...US1.0...U.
..Symantec Corporation1.0...U...Symantec Trust Network1/0-...U...&Symantec Class 3 Secure Server CA - G40..
16110900000Z.
171109235959Z0..1.0  ..U...US1.0...U...North Carolina1.0...U...Raleigh1.0...U.
..Peoplefluent, Inc.1.0...U...Engineering1 0...U...careers.peopleclick.com0.."0
.      *.H..
.....0..
.....g./..S.....*...].W.....Y$.x.2.....U..{...*.....{...Z.S.(.\.eC .p..
>^...t.....U..... .l..LZ.T...?.t.f.d.x....l.%..8w.h....j.*;X....P.5;...Qvu.m.I..Cp...
..6.Q;T...C.....K.O.#...~i.(....7Zv.....K.....*...*...S..QK.t.i..F..~.{..._.....t0..p0" ..U...
0...careers.peopleclick.com0  ..U...0.0...U.....0a..U.  .Z0X0V..g....0L0#..+.....https://d.symcb.com/
cps0%.+.....0...https://d.symcb.com/rpa0+..U...$0"0  ....http://ss.symcb.com/ss.cr10...U.%..0...+.....+.....
0...U.#..0..._`a.U..C..`*..z.C..0W..+.....K0I0...+.....0...http://ss.symcd.com0&..+.....0...http://ss.symcb.com/
ss.crt0...
+...y.....v....+z
0. ....hp~.....\..=.....XJz.w....G0E. J..0&....2.,0
```

35. Defendant, at least in internal use and testing, uses a server to transmit the extracted content information to the user terminal. As shown in images below, a response is sent from the server to an intermediate system. The intermediate system then transmits the received content to the user terminal.

Time	Source	Destination	Protocol	Length	Info
1336 17.867078	192.168.1.103	192.168.1.102	TLSv1.2	733	Application Data
1337 17.867290	192.168.1.102	104.108.214.78	TLSv1.2	721	Application Data
1338 17.874648	104.108.214.78	192.168.1.102	TCP	54	443 → 63775 [ACK] Seq=161 Ack=919 Win=31648 Len=0
1339 17.879699	192.168.1.102	192.168.1.103	TCP	66	8888 → 60056 [ACK] Seq=108 Ack=450 Win=17152 Len=0 TSval=21140015 TSecr=472429681
1340 17.879911	104.108.214.78	192.168.1.102	TCP	1514	[TCP segment of a reassembled PDU]
1341 17.881912	104.108.214.78	192.168.1.102	TCP	1514	[TCP segment of a reassembled PDU]
1342 17.882028	192.168.1.102	104.108.214.78	TCP	54	63775 → 443 [ACK] Seq=919 Ack=3081 Win=16384 Len=0
1343 17.884331	104.108.214.78	192.168.1.102	TCP	1514	[TCP segment of a reassembled PDU]
1344 17.886488	104.108.214.78	192.168.1.102	TCP	1514	[TCP segment of a reassembled PDU]
1345 17.886492	104.108.214.78	192.168.1.102	TCP	1514	[TCP segment of a reassembled PDU]
1346 17.886635	192.168.1.102	104.108.214.78	TCP	54	63775 → 443 [ACK] Seq=919 Ack=7461 Win=16384 Len=0
1347 17.888790	104.108.214.78	192.168.1.102	TCP	1514	[TCP segment of a reassembled PDU]
1348 17.888921	192.168.1.102	104.108.214.78	TCP	54	63775 → 443 [ACK] Seq=919 Ack=8921 Win=16384 Len=0
1349 17.889145	104.108.214.78	192.168.1.102	TCP	1514	[TCP segment of a reassembled PDU]
1350 17.889147	104.108.214.78	192.168.1.102	TCP	378	[TCP Previous segment not captured] [TCP segment of a reassembled PDU]
1351 17.889248	192.168.1.102	104.108.214.78	TCP	66	63775 → 443 [ACK] Seq=919 Ack=10381 Win=16384 Len=0 SLE=16221 SRE=16545
1352 17.892233	104.108.214.78	192.168.1.102	TCP	1514	[TCP Out-Of-Order] [TCP segment of a reassembled PDU]
1353 17.892235	104.108.214.78	192.168.1.102	TCP	1514	[TCP Out-Of-Order] [TCP segment of a reassembled PDU]
1354 17.892236	104.108.214.78	192.168.1.102	TCP	1514	[TCP Out-Of-Order] [TCP segment of a reassembled PDU]
1355 17.892353	192.168.1.102	104.108.214.78	TCP	66	63775 → 443 [ACK] Seq=919 Ack=11841 Win=16384 Len=0 SLE=16221 SRE=16545
1356 17.892552	192.168.1.102	104.108.214.78	TCP	66	63775 → 443 [ACK] Seq=919 Ack=13301 Win=16384 Len=0 SLE=16221 SRE=16545
1357 17.892714	192.168.1.102	104.108.214.78	TCP	66	63775 → 443 [ACK] Seq=919 Ack=14761 Win=16384 Len=0 SLE=16221 SRE=16545
1358 17.894803	104.108.214.78	192.168.1.102	TCP	1514	[TCP Out-Of-Order] [TCP segment of a reassembled PDU]
1359 17.894911	192.168.1.102	104.108.214.78	TCP	54	63775 → 443 [ACK] Seq=919 Ack=16545 Win=16384 Len=0
1360 17.895140	192.168.1.102	192.168.1.103	TCP	1514	[TCP segment of a reassembled PDU]
1361 17.895207	192.168.1.102	192.168.1.103	TCP	1514	[TCP segment of a reassembled PDU]
1362 17.895248	192.168.1.102	192.168.1.103	TCP	1514	[TCP segment of a reassembled PDU]
1363 17.895298	192.168.1.102	192.168.1.103	TCP	1514	[TCP segment of a reassembled PDU]
1364 17.900022	192.168.1.103	192.168.1.102	TCP	66	60059 → 8888 [ACK] Seq=1175 Ack=3164 Win=128576 Len=0 TSval=472429752 TSecr=21140017
1365 17.900024	192.168.1.103	192.168.1.102	TCP	66	60059 → 8888 [ACK] Seq=1175 Ack=6060 Win=128160 Len=0 TSval=472429752 TSecr=21140017
1366 17.900115	192.168.1.102	192.168.1.103	TCP	1514	[TCP segment of a reassembled PDU]
1367 17.900173	192.168.1.102	192.168.1.103	TCP	1514	[TCP segment of a reassembled PDU]
1368 17.900208	192.168.1.102	192.168.1.103	TCP	1514	[TCP segment of a reassembled PDU]

### Claim 8

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

37. Defendant infringes claim 8.



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

39. Defendant uses a user terminal comprising a camera configured to obtain a photographic image of a code pattern (*e.g.*, QR code).

40. Defendant uses a user terminal comprising a processor which in turn comprises an image processor configured to process the photographic image of the code 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.

41. Defendant uses 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 Defendant).

42. Defendant uses 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 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 or response for accessing a webpage associated with Defendant is sent to Defendant's server by means of transceiver of the smartphone:

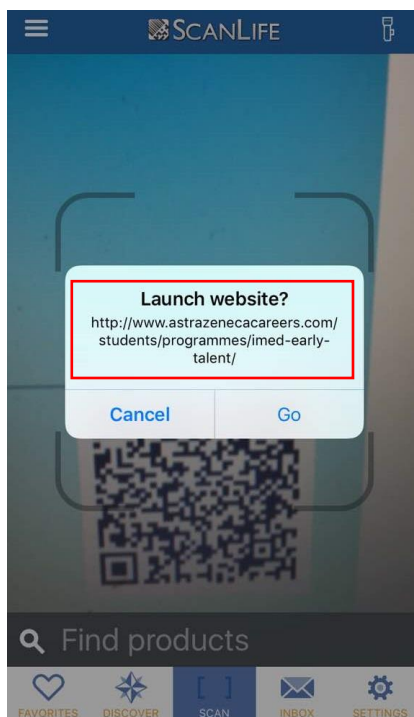


iPhone 7

Overview iOS Tech Specs [Buy](#)

**Cellular and Wireless**

<p><b>Model A1660*</b></p> <p><b>Model A1661*</b></p>	<p><u>FDD-LTE (Bands 1, 2, 3, 4, 5, 7, 8, 12, 13, 17, 18, 19, 20, 25, 26, 27, 28, 29, 30)</u></p> <p><u>TD-LTE (Bands 38, 39, 40, 41)</u></p> <p><u>TD-SCDMA 1900 (F), 2000 (A)</u></p> <p><u>CDMA EV-DO Rev. A (800, 1900, 2100 MHz)</u></p> <p><u>UMTS/HSPA+/DC-HSDPA (850, 900, 1700/2100, 1900, 2100 MHz)</u></p> <p><u>GSM/EDGE (850, 900, 1800, 1900 MHz)</u></p>
<p><b>Model A1778*</b></p> <p><b>Model A1784*</b></p> <p><small>Models A1778 and A1784 do not support CDMA networks, such as those used by Verizon and Sprint.</small></p>	<p><u>FDD-LTE (Bands 1, 2, 3, 4, 5, 7, 8, 12, 13, 17, 18, 19, 20, 25, 26, 27, 28, 29, 30)</u></p> <p><u>TD-LTE (Bands 38, 39, 40, 41)</u></p> <p><u>UMTS/HSPA+/DC-HSDPA (850, 900, 1700/2100, 1900, 2100 MHz)</u></p> <p><u>GSM/EDGE (850, 900, 1800, 1900 MHz)</u></p>





### *Claim 9*

43. 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.

44. Defendant infringes claim 9.

45. Defendant uses a user terminal to receive content information that comprises image and text data.

### *Claim 10*

46. 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.

47. Defendant infringes claim 10.

48. Defendant uses a user terminal (*e.g.*, smartphone) that is configured to extract a uniform resource locator (URL) of the server (*e.g.*, Defendant's server) from the code information (*e.g.*, URL of web page associated with Defendant).

49. Defendant uses a user terminal (*e.g.*, smartphone) comprising a transceiver

configured to transmit the content information request message (*e.g.*, http request message for accessing the webpage associate with Defendant) to the server (*e.g.*, Defendant's server) based on the extracted URL.

***Claim 11***

50. Through claim 11, the '159 Patent claims the user terminal of claim 8, wherein the server is configured to receive the content information request message from the user terminal; extract requested content information from a database based on the content information request message; and transmit the extracted content information to the user terminal.

51. Defendant infringes claim 11.

52. Defendant, at least in internal use and testing, utilizes a server for receiving the content information request (*e.g.*, http GET request) from a user terminal (*e.g.*, smartphone). A HTTP GET request is sent from a user terminal to an intermediate system to access a certain web page. The intermediate system transmits the received request to Defendant's web server. The web server responds to the intermediate system that the content is moved permanently along with the updated location of requested content. The intermediate system sends this information to the user terminal. The mobile terminal further sends a new HTTP GET request to an intermediate system to access a web page located at a new location. The intermediate system again transmits the received request to Defendant's web server.

53. Defendant, at least in internal use and testing, extracts requested content information from a database based on the content information request message. The server then responds to the GET request with HTML content.

54. Defendant, at least in internal use and testing, uses a server to transmit the extracted content information to the user terminal. A response is sent from the server to an

intermediate system. The intermediate system transmits the received content to the user terminal.

*Claim 15*

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

56. Defendant infringes claim 15.

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

58. 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).

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

60. Defendant, at least in internal use and testing, decodes the extracted code pattern

by the processor of the user terminal into code information (*e.g.*, URL of web page associated with Defendant).

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

***Claim 16***

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

63. Defendant infringes claim 16.

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

65. 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).

66. 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 extract characteristic information from the photographic image.

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

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

69. Defendant's acts of infringement of the '159 Patent have caused and will continue to cause Plaintiff damages for which Plaintiff is entitled to compensation pursuant to 35 U.S.C. § 284.

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

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

72. Plaintiff retained the law firms of WATSON LLP and STAMOULIS & WEINBLATT, LLC to represent its interests in this action, and is obligated to pay such firm reasonable attorneys' fees for its services. Plaintiff may recover its attorneys' fees and costs from Defendant, pursuant to 35 U.S.C. § 285, because this case is exceptional.

**WHEREFORE**, Plaintiff, CODING TECHNOLOGIES, LLC, demands judgment against Defendant, ASTRAZENECA PHARMACEUTICALS, LP, and respectfully seeks the entry of an order (i) adjudging that Defendant has infringed the '159 Patent, in violation of 35 U.S.C. § 271; (ii) granting an injunction enjoining Defendant, its employees, agents, officers,

directors, attorneys, successors, affiliates, subsidiaries and assigns, and all of those in active concert and participation with any of the foregoing persons or entities from infringing, contributing to the infringement of, or inducing infringement of the '159 Patent; (iii) ordering Defendant to account and pay damages adequate to compensate Plaintiff for Defendant's infringement of the '159 Patent, with pre-judgment and post-judgment interest and costs, pursuant to 35 U.S.C. § 284; (iv) ordering that the damages award be increased up to three times the actual amount assessed, pursuant to 35 U.S.C. § 284; (v) declaring this case exceptional and awarding Plaintiff its reasonable attorneys' fees, pursuant to 35 U.S.C. § 285; and, (vi) awarding such other and further relief as this court deems just and proper.

**DATED** on October 16, 2017

Respectfully submitted,

*/s/ Stamatios Stamoulis*

---

*STAMOULIS & WEINBLATT LLC*

Stamatios Stamoulis #4606

[stamoulis@swdelaw.com](mailto:stamoulis@swdelaw.com)

Richard C. Weinblatt #5080

[weinblatt@swdelaw.com](mailto:weinblatt@swdelaw.com)

Two Fox Point Centre

6 Denny Road, Suite 307

Wilmington, DE 19809

Telephone: (302) 999-1540

*Attorneys for Plaintiff*

CODING TECHNOLOGIES, INC.