**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FINNAVATIONS LLC	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	**PATENT CASE**
	§	
INVOICE2GO, INC.	§	
	§	
	§	
Defendant.	§	
_____	§	

COMPLAINT

Plaintiff Finnavations LLC ("Plaintiff" or "Finnavations") files this Complaint against

Invoice2go, Inc. ("Defendant" or "Invoice2go") for infringement of United States Patent No.

9,569,755 (hereinafter "the '755 Patent").

PARTIES AND JURISDICTION

1.   This is an action for patent infringement under Title 35 of the United States

Code. Plaintiff is seeking injunctive relief as well as damages.

2.   Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal

Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising

under the United States patent statutes.

3.   Plaintiff is a Texas limited liability company with a virtual office located at

3415 Custer Rd., Suite 120-B, Plano, Texas 75023.

4.   Upon information and belief, Defendant is a Delaware corporation with its

principal place of business in the United States at 555 Bryant Street #263

Palo Alto, CA 94301.

5.   This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6.   Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7.   Venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to reside in this District because it is a Delaware corporation.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 9,569,755)

8.   Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq*.

10.   Plaintiff is the owner by assignment of the '755 Patent with sole rights to enforce the '755 Patent and sue infringers.
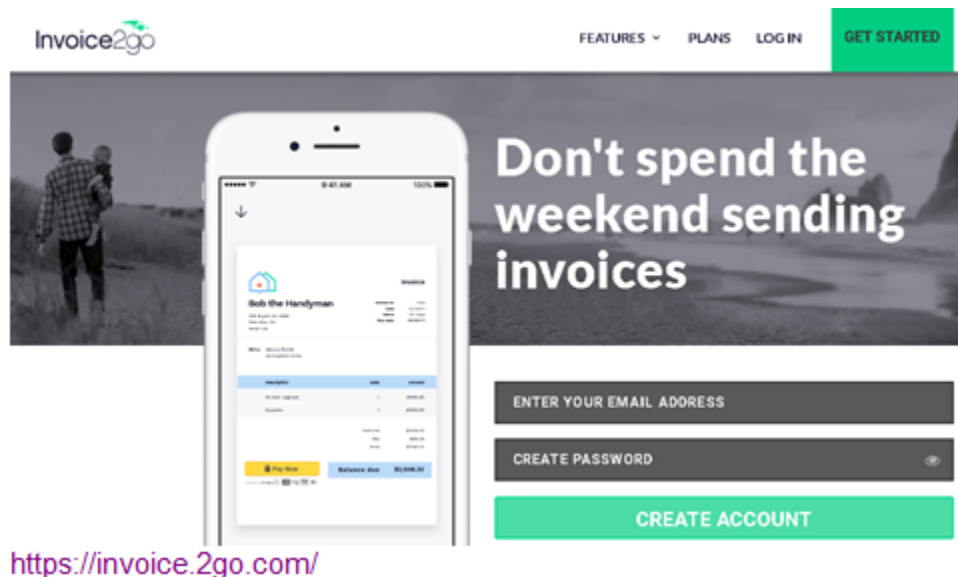
11.   A copy of the '755 Patent, titled "Financial Management System," is attached hereto as Exhibit A.
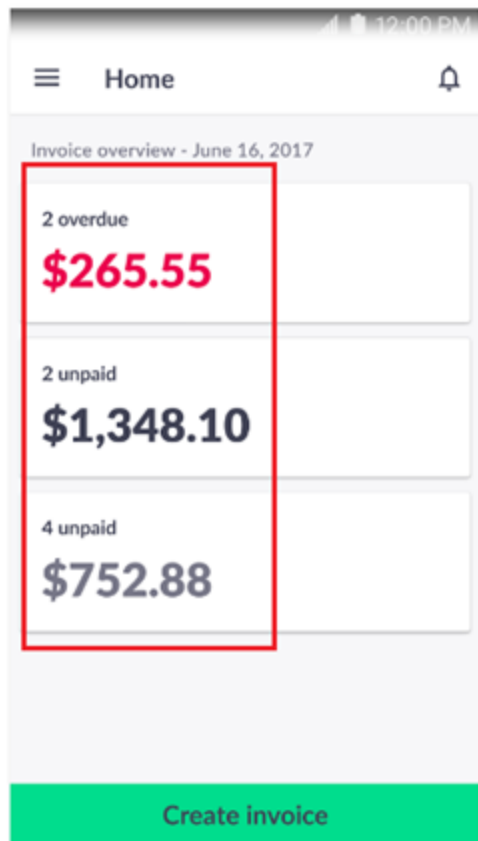
12.   The '755 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code. The '755 Patent was issued on February 14, 2017 after all claims of the '755 Patent overcame Examiner's claim rejections under 35 USC § 101 raised in the Examiner's June 14, 2016 non-final rejection.

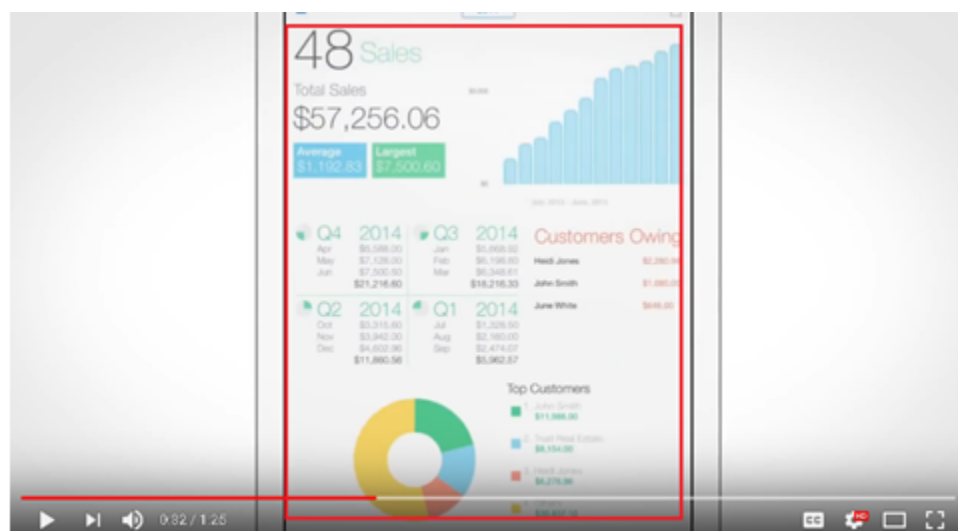13.   Upon information and belief, Defendant has infringed and continues to infringe

one or more claims, including at least Claims 9, 10, 14, and 17 of the '755 Patent by making, using, importing, selling, and/or offering for sale a financial management system, including the Invoice2go web app and system, the Invoice2go mobile app, and any similar products and/or services ("Product"), covered by one or more claims of the '755 Patent.   Defendant has infringed and continues to infringe the '755 Patent in violation of 35 U.S.C. § 271.

13.   Regarding Claim 9, Defendant sells, offers to sell, and/or uses the Product, which provides for delivery of transaction data (e.g., data regarding invoices) to a financial management program (e.g., the Invoice2go platform residing on a cloud server).   Certain aspects of this element and other elements referred to below are illustrated in the following screenshots.
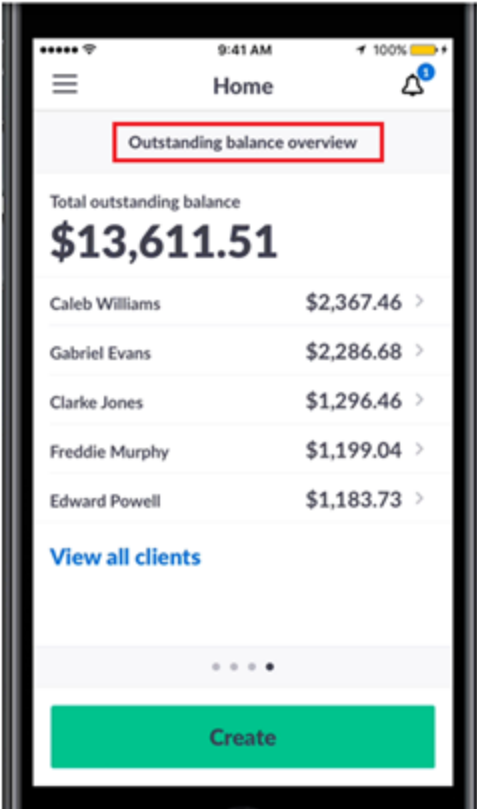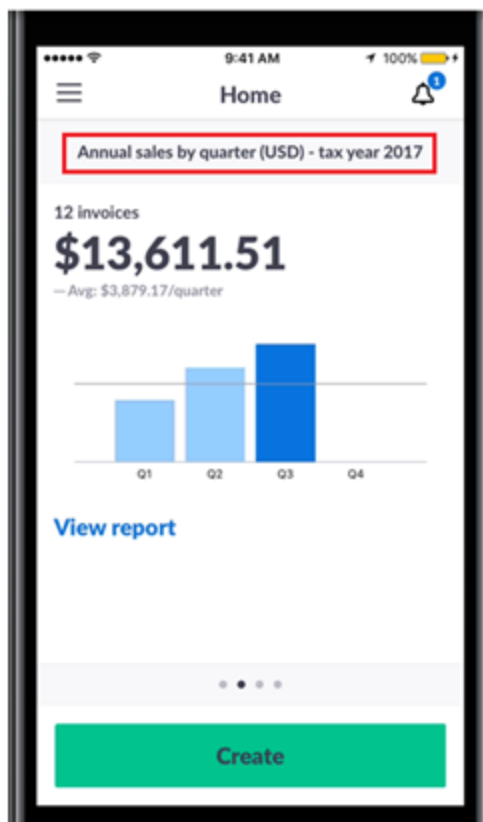

https://invoice.2go.com/

https://play.google.com/store/apps/details?id=com.invoice2go.invoice2goplus&hl=en

https://www.youtube.com/watch?time_continue=26&v=puOQoCqgy50

https://invoice.2go.com/blog/features-tips/product-enhancements-help-manage-business/

https://invoice.2go.com/blog/features-tips/product-enhancements-help-manage-business/

Automatic syncing

We want you to have everything you need on whatever device you use. We've upgraded the technical side of our platform so you can focus on business, without a hitch and always have reliable access to the documents that you need.
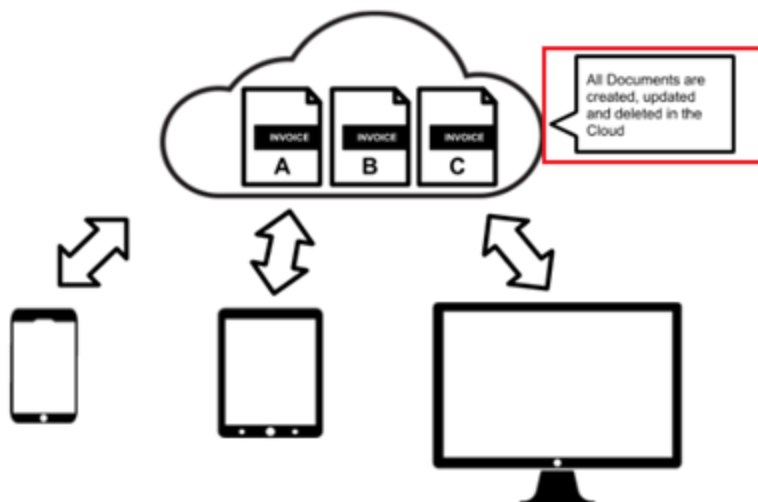
https://invoice.2go.com/the-new-invoice2go/

Invoice2go

Invoice2go Has Moved to The Cloud!

This version of Invoice2go has been replaced by our newest cloud-based product, which allows you to create and send invoices from your smartphone, tablet or computer. Even better, everything will sync across all your devices. We encourage you to upgrade as soon as possible.
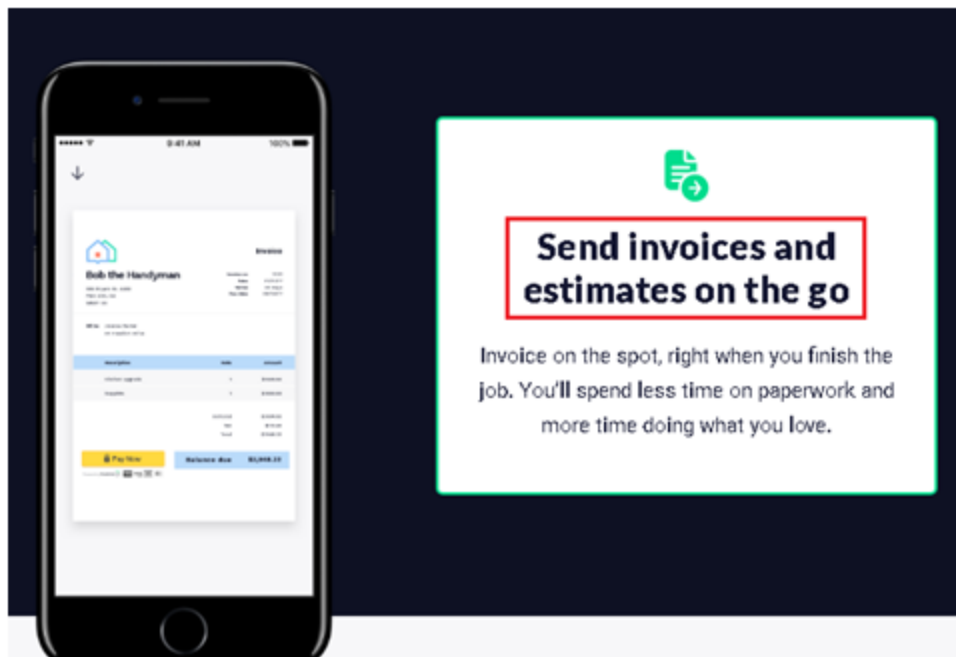
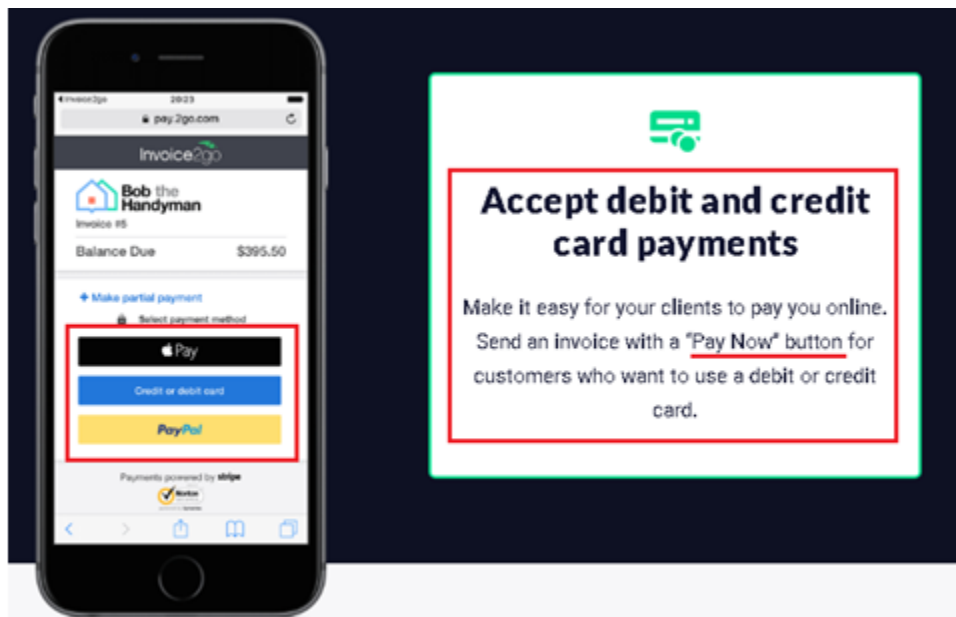http://classic.invoice2go.com/

New Invoice2go Syncing

https://support.2go.com/hc/en-us/articles/115000361511-Differences-in-Syncing-Between-the-Previous-and-New-Invoice2go-Apps

14.   The Product uses a network device (e.g., a laptop, computer, or smartphone) to conduct an online financial transaction (e.g., a user can use the Invoice2go web application or mobile application to send invoices to customers and receive payment) with a commercial web server (e.g., the credit card processing server utilized to process a customer invoice payment). Certain aspects of these elements are illustrated in the following screenshots.

https://invoice.2go.com/

https://invoice.2go.com/

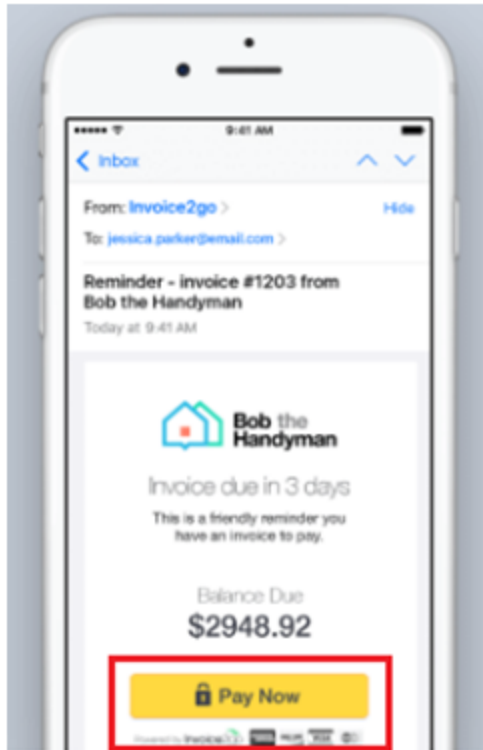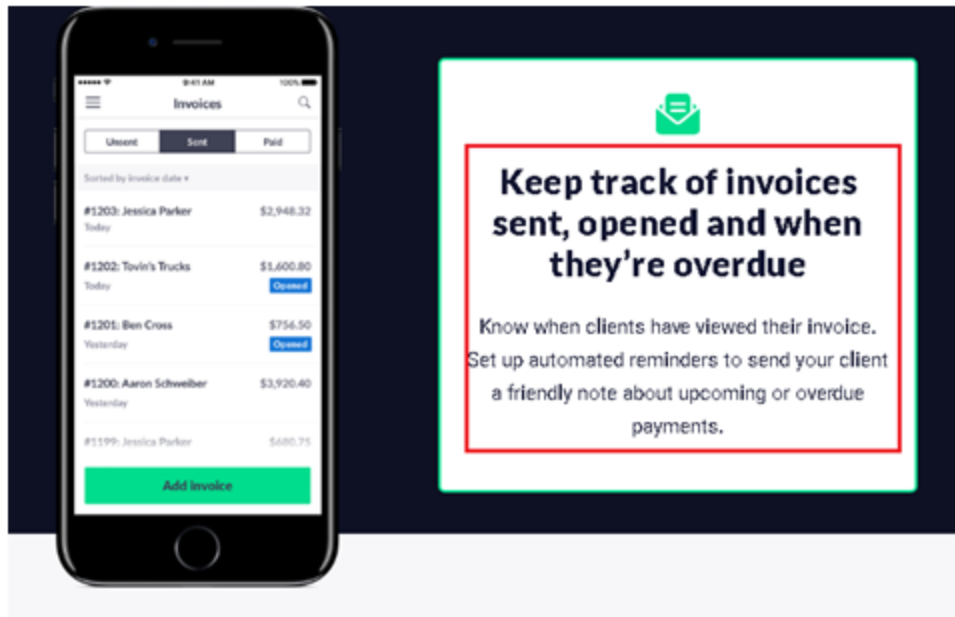https://invoice.2go.com/invoice-billing-features-small-business/

15.   The Product utilizes a financial assistant (e.g. the Invoice2go mobile app or web-based application) on a network device (e.g., a laptop, computer, or smartphone) to search a set of transmitted data related to online financial transactions (e.g., the Invoice2go application must analyze the data transmitted during an invoice payment in order to determine and display the current status of said invoice on a user dashboard). Certain aspects of these elements are illustrated in the following screenshots.
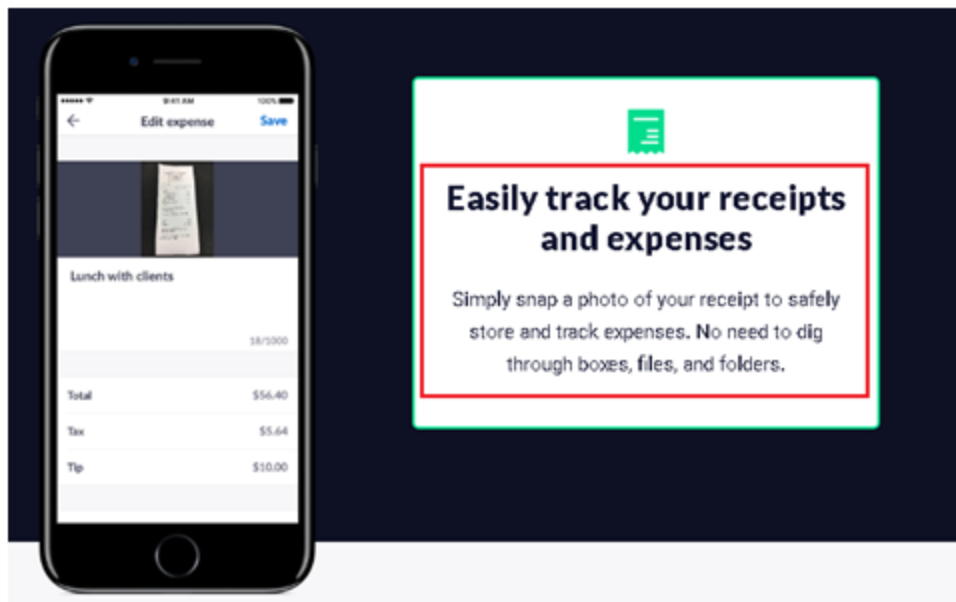
https://invoice.2go.com/

https://invoice.2go.com/invoice-billing-features-small-business/

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https://invoice.2go.com/
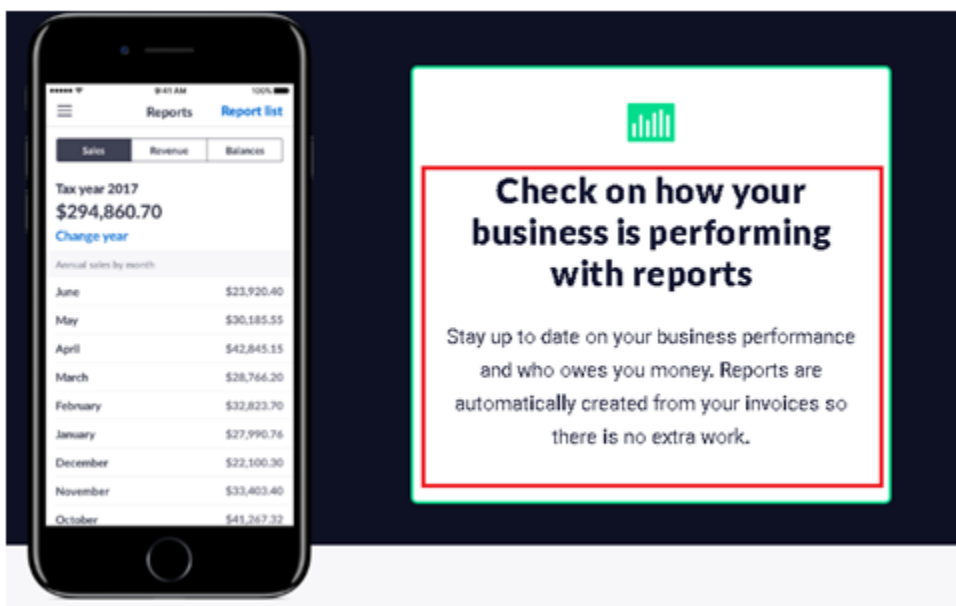
16.   The financial assistant on the network device determines whether the searched data comprises transaction data for the online financial transaction (e.g., the Invoice2go application must determine if particular invoice payment data is related to a particular invoice so that it can correlate a particular payment to particular invoice and categorize that invoice as

paid and thus further modify data related to invoices such as total amount from invoices awaiting payment).

17. When searched data (e.g., transaction data related to invoice payments) comprises transaction data in a first data structure (e.g., the data structure utilized to consummate a credit card payment on a processing server) compatible with conducting the online financial transaction (e.g., the online payment of an invoice), the financial assistant (e.g., the Invoice2go application operating on a computer, laptop, or smartphone) copies and stores the transaction data (e.g., basic information included in the credit card payment of an invoice such as the payment amount) and additional transaction data not included in the transmitted transaction data (e.g., the Invoice2go application combines basic information such as the payment amount to other information relating to the invoice such as the client name and status of the invoice) into a second data structure compatible with the financial management program (e.g., the data structure utilized by the Invoice2go platform to allow for the storing and display of compiled invoice data).

18. Regarding Claim 10, the Product comprises the element of Claim 9 (above) and further comprises repurchasing, by the network device, items from the transaction data from a same merchant by clicking on a repurchase control (e.g., Recurring invoice or bill). Aspects of these elements are shown above in connection the paragraphs discussing Claim 9 and further in the following screenshots.
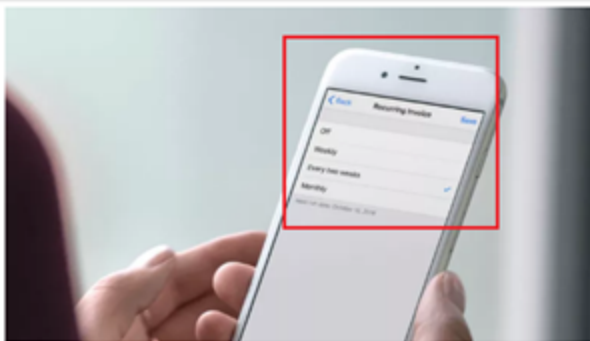
With recurring invoices, you can:

- **Choose the right frequency for each of your repeat customers:** Set up recurring invoices to go out monthly, weekly or every two weeks.

- **Stay organized automatically:** Let Invoice2go remember when a recurring invoice should go out — and prepare it for you automatically. Send it when you're ready.

- **Get paid faster, more consistently:** The faster you send an invoice, the faster you get paid. With recurring invoices, you can invoice repeat customers consistently and on time.

https://invoice.2go.com/blog/features-tips/new-set-recurring-invoices/

HOW IT WORKS

In the app, when you tap the top of an invoice — the same place you tap to change the invoice due date — you'll see a new option to set up a recurring invoice right on the Invoice Details screen. From here, you can set an invoice to go out monthly, weekly or every two weeks.

Based on the frequency you select, Invoice2go automatically keeps track of when the next invoice should be sent and prepares an invoice for your review. You'll receive a notification when the invoice is ready, giving you a chance to review and edit before sending.

With this all-new feature, you can say goodbye to forgotten and delayed invoices, helping you stay focused on the next job well done.

https://invoice.2go.com/blog/features-tips/new-set-recurring-invoices/

19.   Regarding Claim 14, the Product includes the element of Claim 9 (above) and further includes repurchasing, by the network device, items from the transaction data from a same merchant by clicking on a repurchase control, wherein received user input adjusts goods and services to be repurchased (e.g., edit the information for existing recurring invoice). Certain aspects of the foregoing are illustrated above in connection with the allegations regarding Claims 9 and 10.

20.   Regarding Claim 17, the Product's network device is at least one of a terminal

device (e.g., smartphone, laptop, computer, etc.) and a computer server (e.g., cloud server).

21.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

22.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

23.   Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a)   Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b)   Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,569,755 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c)   Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d)   Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e)   Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: November 6, 2017   Respectfully submitted,

         /s/Stamatios Stamoulis
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