IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

COMPLAINT

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

Odoo, Inc. ("Defendant" or "Odoo") 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   at   44   Wall   Street   Suite   603

New York, NY 10005.

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

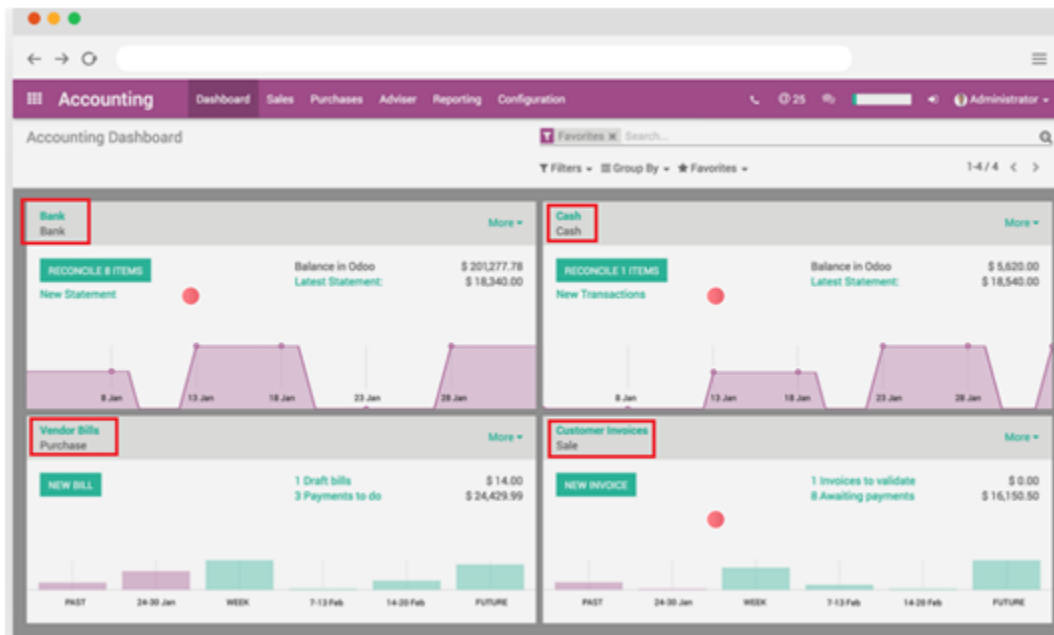enforce the '755 Patent and sue infringers.

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

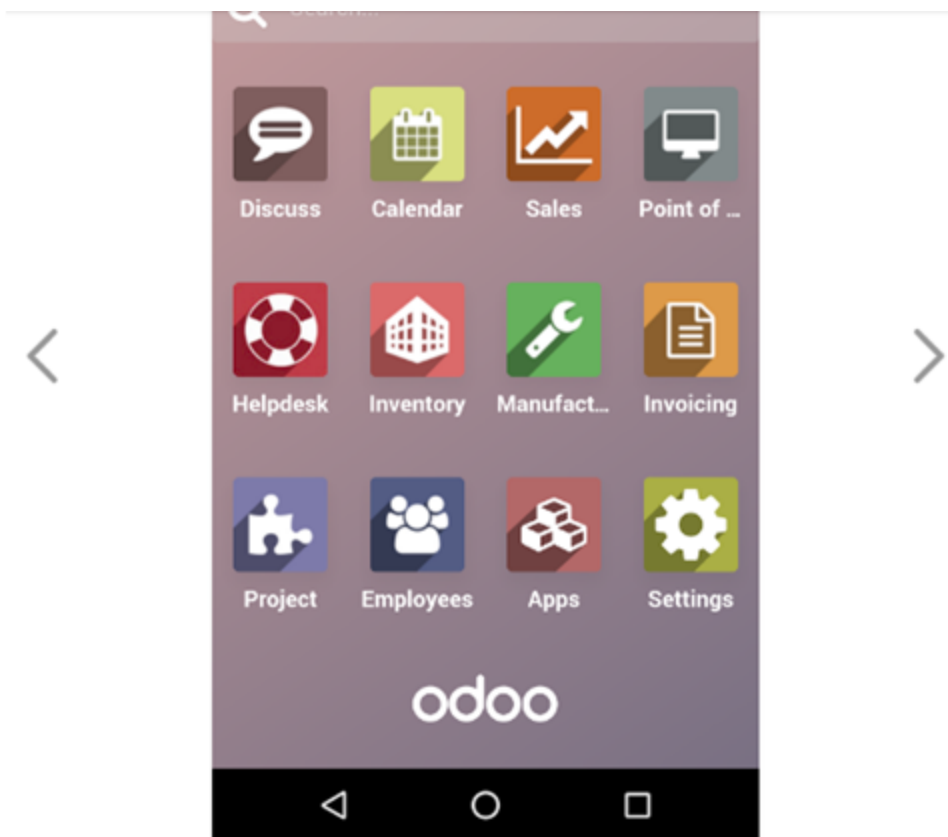raised in the Examiner's June 14, 2016 non-final rejection.

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

Odoo accounting web application and system, the Odoo mobile apps, 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 Odoo platform residing on a cloud server). Certain aspects of

this element and other elements referred to below are illustrated in the following screenshots.

https://www.odoo.com/page/accounting

Odoo Mobile:

The new Odoo Mobile app for Android provides access to all Odoo applications directly from your mobile phone. Optimized for interfaces on any Android device, Odoo Mobile provides the next level of flexibility in your business management software.

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

Odoo Mobile:

The new Odoo Mobile app for Android provides access to all Odoo applications directly from your mobile phone. Optimized for interfaces on any Android device, Odoo Mobile provides the next level of flexibility in your business management software.

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

Simplify your accounting

Keep track of bank account movements and the status of invoices.

Use the status overview to help keep track of drafts, paid and unpaid invoices. Automatically record all transactions from your bank accounts by importing and reconciling your bank statements.

https://www.odoo.com/page/billing

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 Odoo 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.

Invoicing Made Easy
Send professional invoices & get paid online
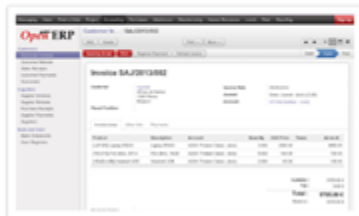
Create and send professional looking invoices & get paid online. It automatically integrates with other apps to bill automatically based on your activities.

https://www.odoo.com/apps/online/account/
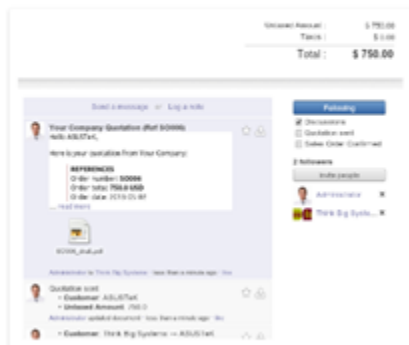
https://www.odoo.com/apps/online/account/
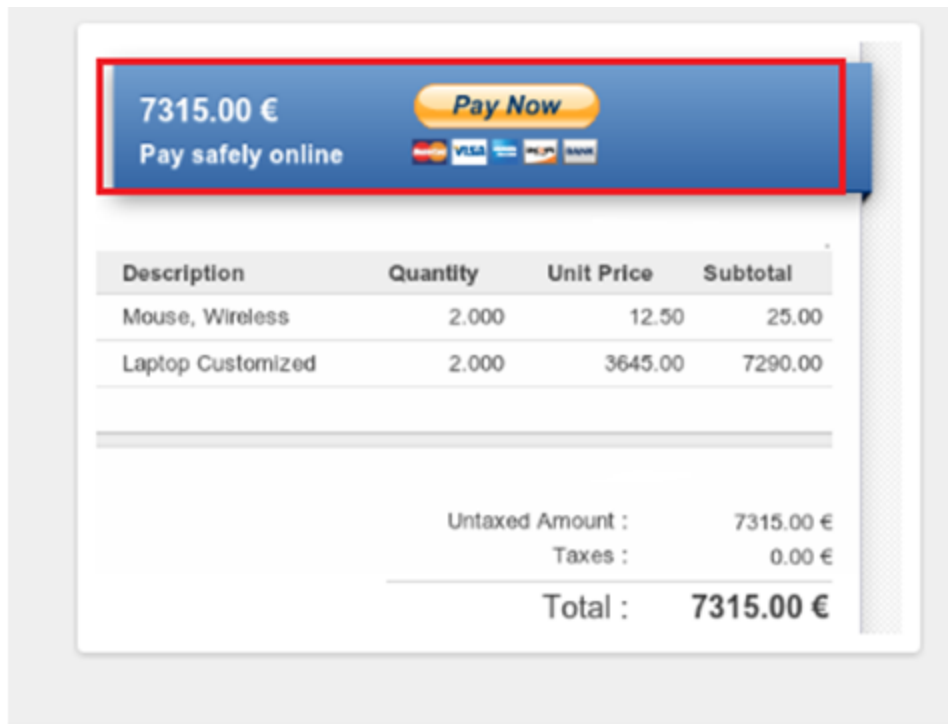
Get Paid Faster

Electronic invoicing and automated follow-ups

Get paid online with paypal or other payment processing service. Get rid of the stress of having to constantly remind your debtors. Simply set-up and automate follow-ups to get paid quickly.
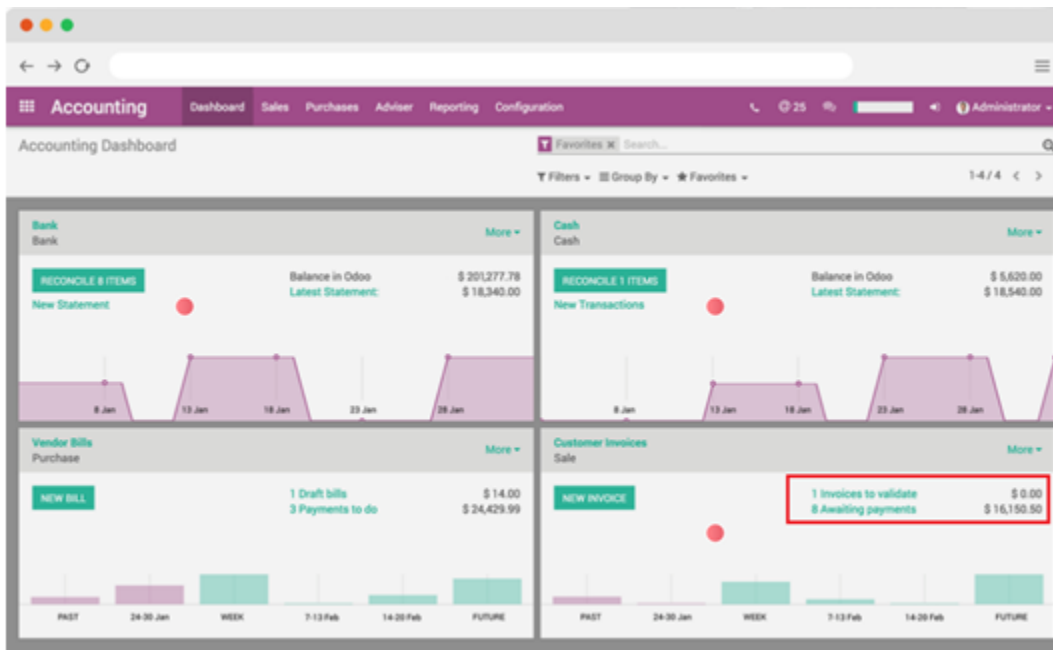
https://www.odoo.com/apps/online/account/

Get paid faster

Online payments and automated follow-ups.

Accept online payments via **Paypal, Ogone, Buckaroo** or **Adyen.**
Eliminate the hassle of sending reminders for late or outstanding
payments. Automated follow-ups are simple to configure and help
to streamline billing to make payments quick and easy.

https://www.odoo.com/page/billing

15.   The Product utilizes a financial assistant (e.g. the Odoo 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 Odoo 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://www.odoo.com/page/accounting

https://www.odoo.com/page/billing

https://www.odoo.com/page/accounting

Simplify your accounting

Keep track of bank account movements and the status of invoices.

Use the status overview to help keep track of drafts, paid and unpaid invoices. Automatically record all transactions from your bank accounts by importing and reconciling your bank statements.

https://www.odoo.com/page/billing

Payment Followup

There's a growing trend of customers paying bills later and later. Therefore, collectors must make every effort to collect money and collect it faster.

Odoo will help you define your follow-up strategy. To remind customers to pay their outstanding invoices, you can define different actions depending on how severely overdue the customer is. These actions are bundled into follow-up levels that are triggered when the due date of an invoice has passed a certain number of days. If there are other overdue invoices for the same customer, the actions of the most overdue invoice will be executed.

By going to the customer record and diving into the "Overdue Payments" you will see the follow-up message and all overdue invoices.

Agrolait

📞 +32 10 588 558

✉ agrolait@yourcompany.example.com

PRINT LETTER **SEND BY EMAIL**   LOG A NOTE   DO IT LATER   Next Reminder: **Auto**   MANUAL

Dear Sir/Madam,

Our records indicate that some payments on your account are still due. Please find details below.
If the amount has already been paid, please disregard this notice. Otherwise, please forward us the total amount stated below.
If you have any queries regarding your account, Please contact us.

Thank you in advance for your cooperation.
Best Regards,

16.   The financial assistant on the network device determines whether the searched data comprises transaction data for the online financial transaction (e.g., the Odoo 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 Odoo 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 Odoo 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 Odoo 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.
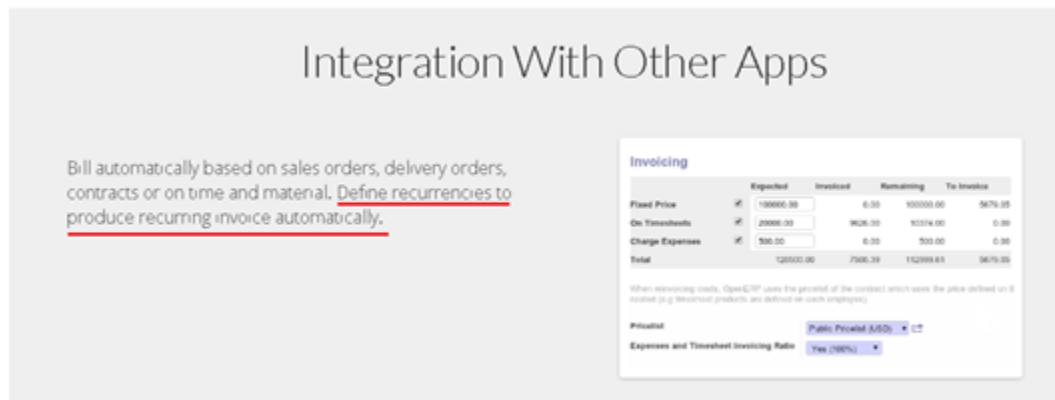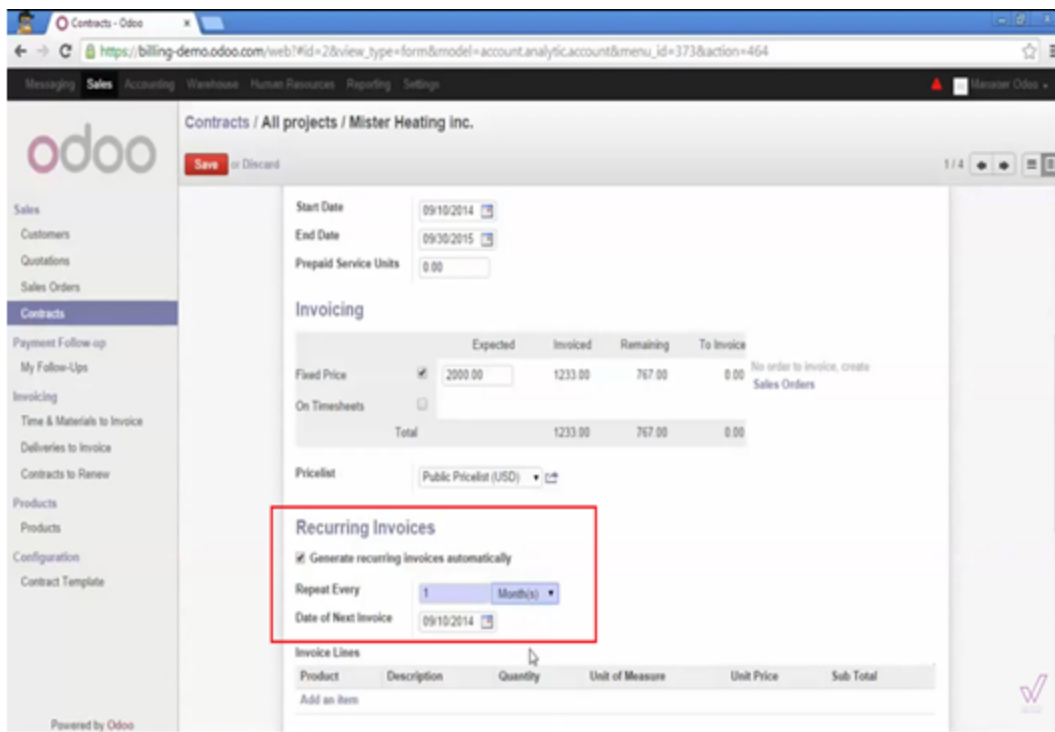
https://www.youtube.com/watch?v=FGcrLu-I5wU
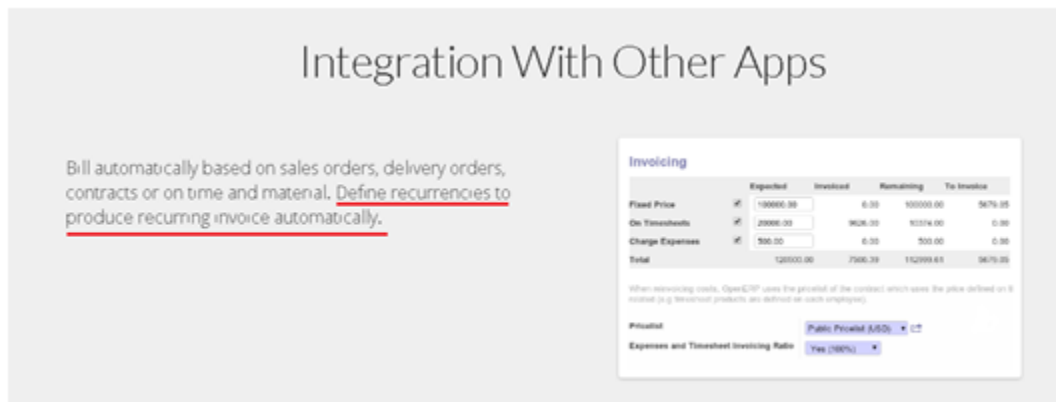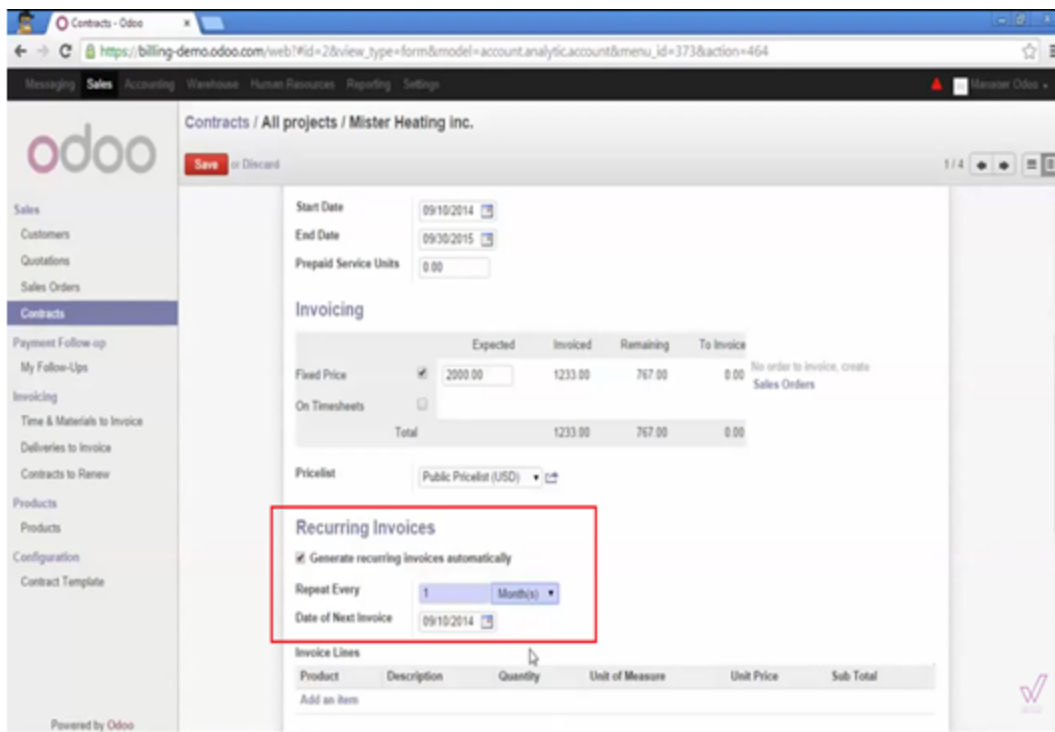
19.   Regarding Claim 14, the Product includes the element of Claim 9 (above) and further includes repurchasing, by the network device, items from the transaction data from a same merchant by clicking on a repurchase control, wherein received user input adjusts goods and services to be repurchased (e.g., 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 and the screenshots below.

https://www.odoo.com/apps/online/account/

https://www.youtube.com/watch?v=FGcrLu-I5wU

https://www.youtube.com/watch?v=FGcrLu-I5wU
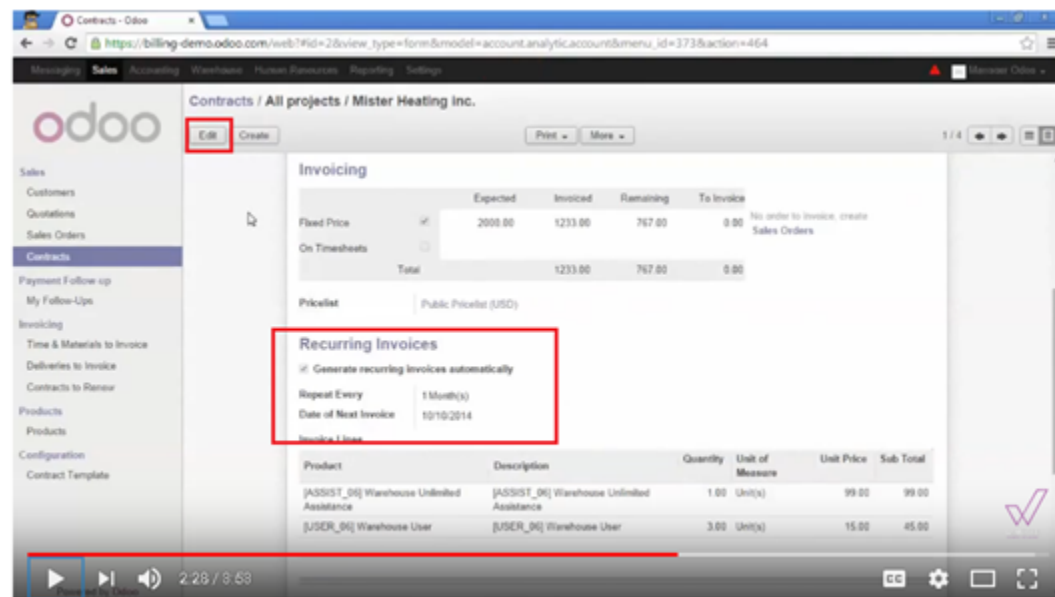
20.   Regarding Claim 17, the Product's network device is at least one of a terminal device (e.g., smartphone, laptop, computer, etc.) and a computer server (e.g., cloud server).

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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ATTORNEYS FOR PLAINTIFF

EXHIBIT A