

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3
4 CODING TECHNOLOGIES LLC,

5 Plaintiff,

6 vs.

7 THOMSON REUTERS GLOBAL

8 MARKETS INC.,

9 Defendant.

Case No.:

COMPLAINT

INJUNCTIVE RELIEF DEMANDED

JURY TRIAL DEMANDED

10
11 Plaintiff, CODING TECHNOLOGIES LLC, sues Defendant, THOMSON REUTERS
12 GLOBAL MARKETS INC., and alleges as follows:

13 **NATURE OF THE ACTION**

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

18 **PARTIES**

19 2. Plaintiff, CODING TECHNOLOGIES, LLC, is a foreign limited liability
20 company, organized under the laws of the State of Texas.

21 3. Defendant, THOMSON REUTERS GLOBAL MARKETS INC., is a foreign
22 corporation with its headquarters located in Eagan, Minnesota. Defendant uses, sells, and/or
23 offers to sell products and services in interstate commerce that infringe the ‘159 Patent.

24 **SUBJECT MATTER JURISDICTION**

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

1 **PERSONAL JURISDICTION**

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

4 **VENUE**

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

8 **COUNT I**

9 **PATENT INFRINGEMENT**

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

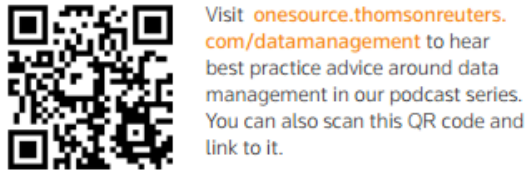
12 8. On September 24, 2013, the United States Patent & Trademark Office (USPTO)
13 duly and legally issued the ‘159 Patent, entitled “Method for Providing Mobile Service Using
14 Code Pattern.” A true and authentic copy of the ‘159 Patent is attached hereto as **Exhibit “A”**
15 and incorporated herein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

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

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

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

1 19. Defendant, at least in internal use and testing, practices a method of providing
2 content (e.g., a web page associated with the defendant) with the use of a code pattern (e.g., a
3 QR code) by a user terminal (e.g., a smartphone), as demonstrated in the following image:



10

11 20. 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), as shown
13 below:



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

25 22. Defendant, at least in internal use and testing, decodes the extracted code pattern
26 by the processor of the user terminal from the QR code into code information (e.g., URL of web
27 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 associated 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.

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

1 locator (URL) of the server from the code information; and transmitting the content information
2 request message to the server based on the extracted URL.

3 29. Defendant infringes claim 3.

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

9 ***Claim 4***

10 31. Through claim 4, the '159 Patent claims the method of claim 1, wherein the server
11 includes receiving the content information request message from the user terminal; extracting
12 requested content information from a database based on the content information request
13 message; and transmitting the extracted content information to the user terminal.

14 32. Defendant infringes claim 4.

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

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

Claim 8

1
2 35. Through claim 8, the '159 Patent claims a user terminal for providing content
3 with the use of a code pattern, the user terminal comprising: a camera configured to obtain a
4 photographic image of a code pattern; a processor comprising: an image processor configured to
5 process the photographic image of the code pattern to extract the code pattern from the
6 photographic image; and a decoder configured to decode the extracted code pattern into code
7 information; and a transceiver configured to (i) transmit a content information request message
8 to a server based on the code information; and (ii) receive content information from the server in
9 response to the content information request message.

10 36. Defendant infringes claim 8.

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

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

16 39. Defendant uses a user terminal comprising a processor which in turn comprises an
17 image processor configured to process the photographic image of the code pattern (*e.g.*, QR
18 code) to extract the code pattern (*e.g.*, QR code) from the photographic image. Once the
19 photographic image of the QR code is captured by the camera of the smartphone, the
20 photographic image is processed to retrieve the QR code. The retrieved QR code can be viewed
21 on the user interface screen of the smartphone.

22 40. Defendant uses a user terminal (*e.g.*, smartphone) comprising a decoder that is
23 configured to decode the extracted code pattern (*e.g.*, QR code) into code information (*e.g.*, URL
24 of web page associated with Defendant).

25 41. Defendant uses a user terminal comprising a transceiver (*e.g.*, FDD- LTE/TDD -
26 LTE/CDMA//EDGE transceiver) which is configured to transmit or receive a content
27 information request message (*e.g.*, http request message for accessing the webpage associated
28 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:

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

Claim 9

42. 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.

43. Defendant infringes claim 9.

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

Claim 10

45. Through claim10, 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.

46. Defendant infringes claim 10.

47. Defendant uses a user terminal (e.g., smartphone) that is configured to extract a

1 uniform resource locator (URL) of the server (*e.g.*, Defendant's server) from the code
2 information (*e.g.*, URL of web page associated with Defendant).

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

7 ***Claim 11***

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

12 50. Defendant infringes claim 11.

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

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

25 53. Defendant, at least in internal use and testing, uses a server to transmit the
26 extracted content information to the user terminal. A response is sent from the server to an
27 intermediate system. The intermediate system transmits the received content to the user
28 terminal.

Claim 15

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

12 55. Defendant infringes claim 15.

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

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

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

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

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

Claim 16

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

8 62. Defendant infringes claim 16.

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

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

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

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

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

24 68. Defendant's acts of infringement of the '159 Patent have caused and will continue
25 to cause Plaintiff damages for which Plaintiff is entitled to compensation pursuant to 35 U.S.C. §
26 284.

27 69. Defendant's acts of infringement of the '159 Patent have caused and will continue
28 to cause Plaintiff immediate and irreparable harm unless such infringing activities are also

1 enjoined by this court pursuant to 35 U.S.C. § 283. Plaintiff has no adequate remedy at law.

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

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

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

21
22 **DATED** on May 22, 2018

23
24 Respectfully submitted,

25 WATSON LLP

26
27 */s/ Coleman Watson*

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