UNITED STATES DISTRICT COURT

DISTRICT OF DELAWARE

CODING TECHNOLGIES, LLC, Plaintiff, vs. REXNORD CORPORATION, Defendant.	§ § § § § § § § § § § § §	Case No.: 1:18-cv-00660-LPS-CJB **AMENDED COMPLAINT** **INJUNCTIVE RELIEF DEMANDED** **JURY TRIAL DEMANDED**

Plaintiff, CODING TECHNOLGIES, LLC, sues Defendant, REXNORD CORPORATION, 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, REXNORD CORPORATION, is a domestic corporation with its headquarters located in Milwaukee, Wisconsin. 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 Florida and is found in this state. Alternatively, Defendant has already appeared in this action and has not challenged *in personam* jurisdiction, which is now waived by operation of law.

VENUE

6. Venue is proper in this court, pursuant to 28 U.S.C. § 1400(b), because Defendant resides in this judicial district. Alternatively, Defendant has already appeared in this action and has not challenged venue, which is now waived by operation of law.

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 is incorporated herein by reference.

9. The ‘159 Patent teaches a method and apparatus for providing a mobile service with the use of code pattern. The mobile service reads the code pattern and converts the information recorded in the code pattern to produce content that may then be read by the human

eye. In one aspect of the invention, a user simply takes a photograph of a code pattern, the invention decodes the photograph and recognizes URL information that is contained in the code pattern that is not recognizable by the human eye, the invention compares the content on the entire URL associated with the code pattern, transmits information to the associated URL, and then retrieves all content associated with that URL that corresponds with the code pattern.

10. In short, the present invention, through use of technology, eliminates the need for hand typing certain information into a URL, which, *inter alia*, eliminates the risk of transcription error. The present invention is an improvement in the use of traditional barcodes; rather, the present invention includes the additional step of converting analog information to digital information, which is an improvement in the prior art.

11. 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.

12. 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.

13. 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. For example, the inventive concept can be used in a variety of circumstances, including but not limited to transmitting and converting code patterns directed to taxi call services, transmitting and converting code patterns directed to personal connection information, and transmitting and converting code patterns directed to paying bills.

14. 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.

15. The invention claimed by the '159 Patent consists of a system of units that correspond to produce an inventive concept. The system of units includes a code distribution unit, barcode image analyzing unit, code information analyzing unit, transmitting/receiving unit, code information database managing unit, control unit, photographing unit, and user interface unit. In laymen's terms, each unit, which collectively interact as a whole to produce a result, functions as follows:

a. Code distribution unit – unit that analyzes the service identifier recognizes that a service type is the content providing service, and transmits a received barcode image or code information to the barcode image transmitting unit or the code information analyzing unit according to embodiments;
b. Barcode image analyzing unit – unit that receives a barcode image photographed by a photographing unit to extract code information from the barcode image and transmit the code information to the code information analyzing unit in a case where a decoder for decoding the barcode is not provided in the user terminal;
c. Code information analyzing unit – unit that functions to analyze code information received from the code distribution unit or the barcode image analyzing unit and extract the information of a Web page, including content information, from the

analyzed code information corresponding to the code information with reference to the code information database storing therein user contact information corresponding to the code information;

d. Transmitting/receiving unit – unit that functions to receive the content information request message from the user terminal and transmit extracted content information or Web page information to the user terminal;

e. Code information database managing unit – unit that functions to manage the code information database storing therein the Web page information of a Web server corresponding to the code information;

f. Control unit – unit that controls the respective components, generates control signals required to control the barcode image analyzing unit and the code information analyzing unit, extracts content corresponding to the received content request message, and transmits the content to the transmitting/receiving unit;

g. Photographing unit – unit that is a means for recognizing or photographing an image that functions to recognize (or photograph) the barcode, convert recognized (photographed) analog image data into digital image data, and transmit the digital image data to the decoder;

h. User interface unit – unit that functions to provide a user interface so that the user can access the service provider server to be provided with Internet content and provides user interface so that the user can access a corresponding Web server when Web page information is received from the service provider server.

16. 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.

17. Upon information and belief, Defendant has and continues to directly infringe 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.

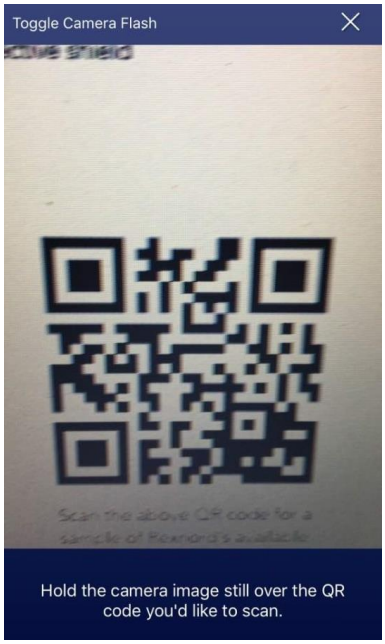
18. The Accused Products infringe at least claims 1, 2, 3, 4, 8, 9, 10, 11, 15, and 16 of the '159 Patent. Each of these claims are system claims.

Claim 1

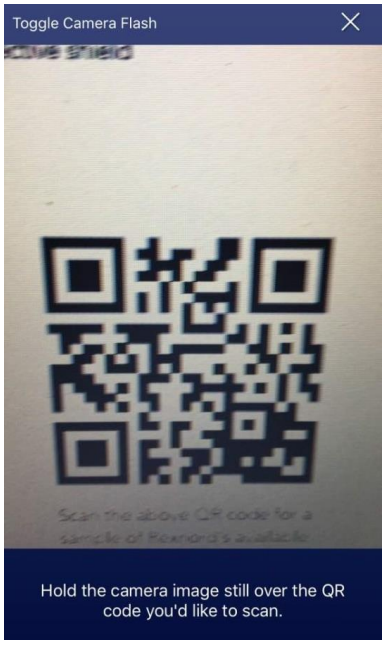
19. Through claim 1, the '159 Patent claims a method of providing content with the use of a code pattern by a user terminal, the method comprising: obtaining a photographic image of a code pattern by a camera of the user terminal; processing, by a processor of the user terminal, the photographic image 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.

20. Defendant infringes claim 1.

21. 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:

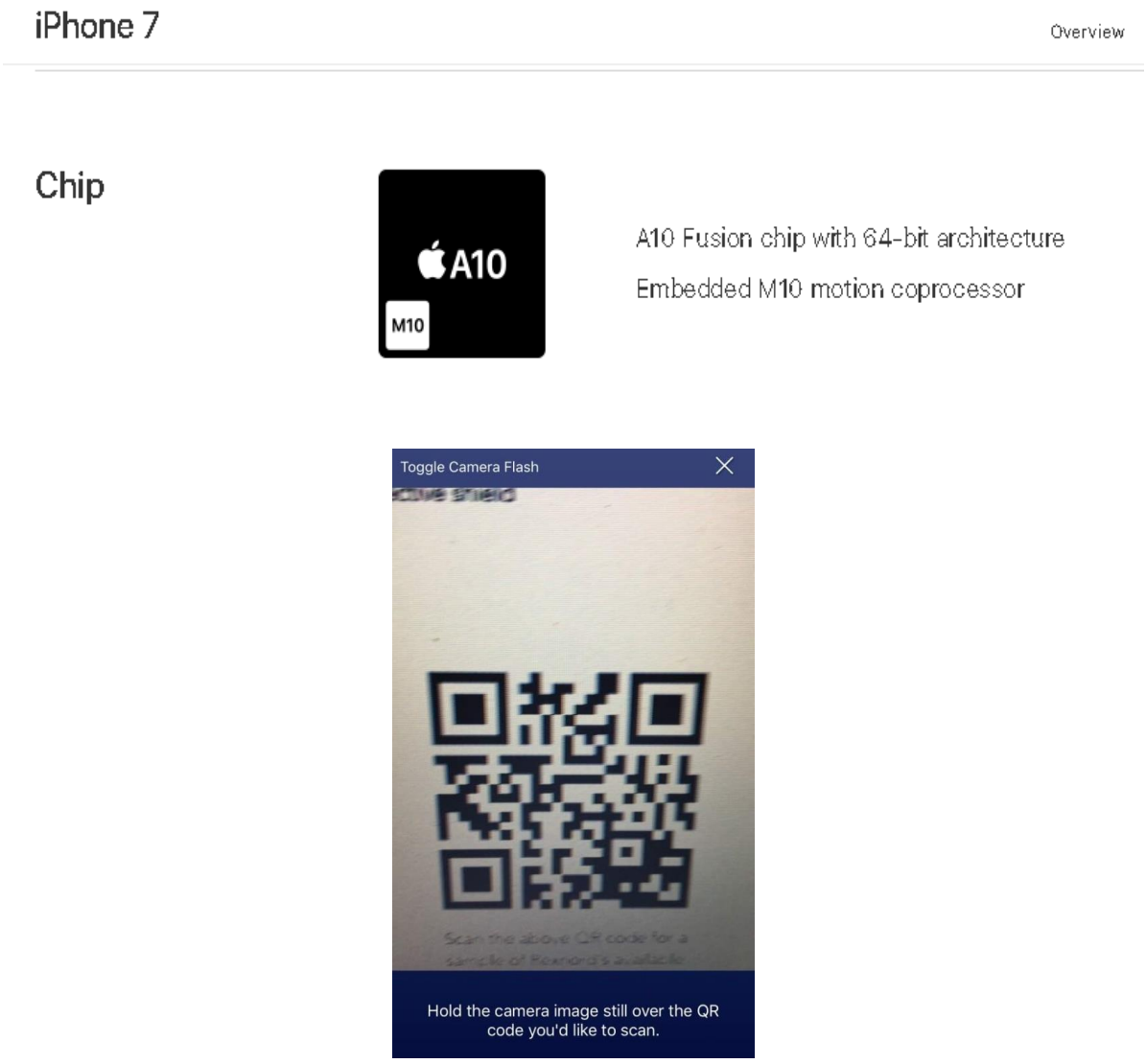


22. Defendant, at least in internal use and testing, obtains a photographic image of a code pattern (*e.g.*, QR code) by a camera of the user terminal (*e.g.*, smartphone), as shown below:

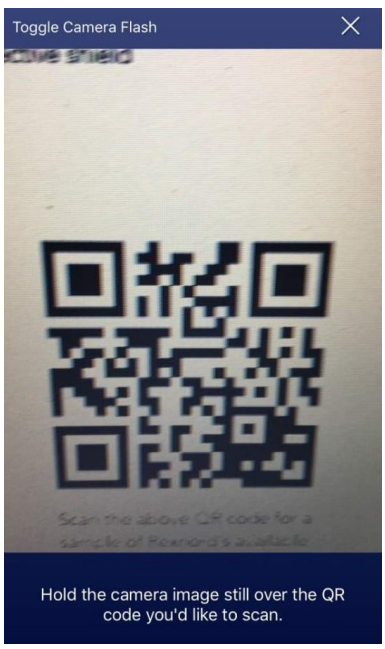


23. Defendant, at least in internal use and testing, processes by a processor of the user terminal (*e.g.*, smartphone), the photographic image of the code pattern (*e.g.*, QR code) to view

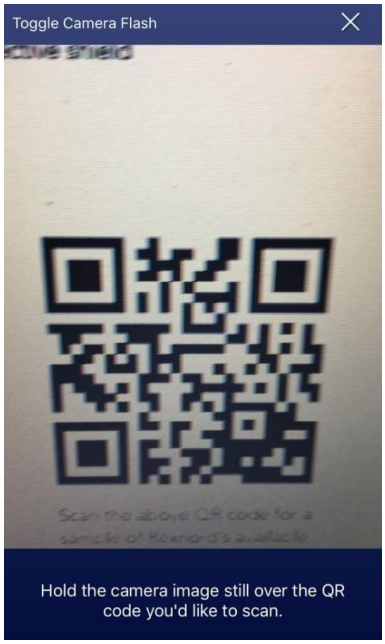
and extract the code pattern from the photographic image, as shown below:



24. 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:



25. 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.



26. 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

27. 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.

28. Defendant infringes claim 2.

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

Claim 3

30. 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.

31. Defendant infringes claim 3.

32. 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.

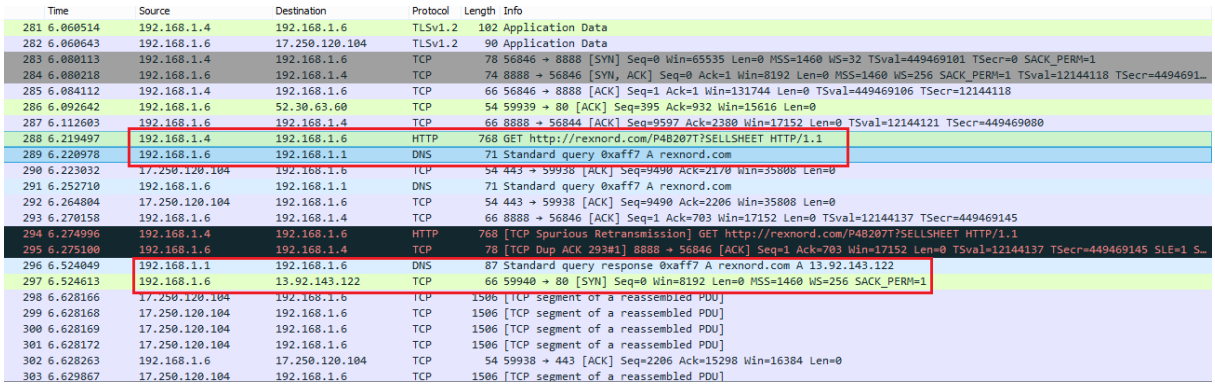
Claim 4

33. 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

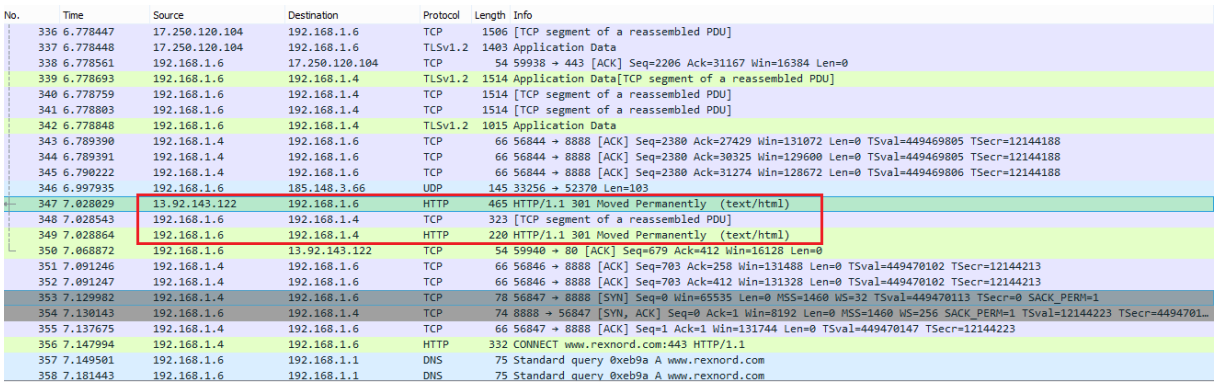
requested content information from a database based on the content information request message; and transmitting the extracted content information to the user terminal.

34. Defendant infringes claim 4.

35. 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
281	6.060514	192.168.1.4	192.168.1.6	TLSv1.2	102	Application Data
282	6.060643	192.168.1.6	17.250.120.104	TLSv1.2	90	Application Data
283	6.080113	192.168.1.4	192.168.1.6	TCP	78	56846 → 8888 [SYN] Seq=0 Win=65535 Len=0 MSS=1460 WS=32 TSval=449469101 TSecr=0 SACK_PERM=1
284	6.080218	192.168.1.6	192.168.1.4	TCP	74	8888 → 56846 [SYN, ACK] Seq=0 Ack=1 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1 TSval=12144118 TSecr=4494691…
285	6.084112	192.168.1.4	192.168.1.6	TCP	66	56846 → 8888 [ACK] Seq=1 Ack=1 Win=131744 Len=0 TSval=449469106 TSecr=12144118
286	6.092642	192.168.1.6	52.30.63.60	TCP	54	59939 → 80 [ACK] Seq=395 Ack=932 Win=15616 Len=0
287	6.112603	192.168.1.6	192.168.1.4	TCP	66	8888 → 56844 [ACK] Seq=9597 Ack=2380 Win=17152 Len=0 TSval=12144121 TSecr=449469080
288	6.219497	192.168.1.4	192.168.1.6	HTTP	768	GET http://rexnord.com/P4B207T?SELLSHEET HTTP/1.1
289	6.220978	192.168.1.6	192.168.1.1	DNS	71	Standard query 0xaff7 A rexnord.com
290	6.223032	17.250.120.104	192.168.1.6	TCP	54	443 → 59938 [ACK] Seq=9490 Ack=2170 Win=35808 Len=0
291	6.252710	192.168.1.6	192.168.1.1	DNS	71	Standard query 0xaff7 A rexnord.com
292	6.264804	17.250.120.104	192.168.1.6	TCP	54	443 → 59938 [ACK] Seq=9490 Ack=2206 Win=35808 Len=0
293	6.270158	192.168.1.6	192.168.1.4	TCP	66	8888 → 56846 [ACK] Seq=1 Ack=703 Win=17152 Len=0 TSval=12144137 TSecr=449469145
294	6.274996	192.168.1.4	192.168.1.6	HTTP	768	[TCP Spurious Retransmission] GET http://rexnord.com/P4B207T?SELLSHEET HTTP/1.1
295	6.275100	192.168.1.6	192.168.1.4	TCP	78	[TCP Dup ACK 293#1] 8888 → 56846 [ACK] Seq=1 Ack=703 Win=17152 Len=0 TSval=12144137 TSecr=449469145 SLE=1 S…
296	6.524049	192.168.1.1	192.168.1.6	DNS	87	Standard query response 0xaff7 A rexnord.com A 13.92.143.122
297	6.524613	192.168.1.6	13.92.143.122	TCP	66	59940 → 80 [SYN] Seq=0 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1
298	6.628166	17.250.120.104	192.168.1.6	TCP	1506	[TCP segment of a reassembled PDU]
299	6.628168	17.250.120.104	192.168.1.6	TCP	1506	[TCP segment of a reassembled PDU]
300	6.628169	17.250.120.104	192.168.1.6	TCP	1506	[TCP segment of a reassembled PDU]
301	6.628172	17.250.120.104	192.168.1.6	TCP	1506	[TCP segment of a reassembled PDU]
302	6.628263	192.168.1.6	17.250.120.104	TCP	54	59938 → 443 [ACK] Seq=2206 Ack=15298 Win=16384 Len=0
303	6.629867	17.250.120.104	192.168.1.6	TCP	1506	[TCP segment of a reassembled PDU]



No.	Time	Source	Destination	Protocol	Length	Info
336	6.778447	17.250.120.104	192.168.1.6	TCP	1506	[TCP segment of a reassembled PDU]
337	6.778448	17.250.120.104	192.168.1.6	TLSv1.2	1403	Application Data
338	6.778561	192.168.1.6	17.250.120.104	TCP	54	59938 → 443 [ACK] Seq=2206 Ack=31167 Win=16384 Len=0
339	6.778693	192.168.1.6	192.168.1.4	TLSv1.2	1514	Application Data[TCP segment of a reassembled PDU]
340	6.778759	192.168.1.6	192.168.1.4	TCP	1514	[TCP segment of a reassembled PDU]
341	6.778803	192.168.1.6	192.168.1.4	TCP	1514	[TCP segment of a reassembled PDU]
342	6.778848	192.168.1.6	192.168.1.4	TLSv1.2	1015	Application Data
343	6.789390	192.168.1.4	192.168.1.6	TCP	66	56844 → 8888 [ACK] Seq=2380 Ack=27429 Win=131072 Len=0 TSval=449469805 TSecr=12144188
344	6.789391	192.168.1.4	192.168.1.6	TCP	66	56844 → 8888 [ACK] Seq=2380 Ack=30325 Win=129600 Len=0 TSval=449469805 TSecr=12144188
345	6.790222	192.168.1.4	192.168.1.6	TCP	66	56844 → 8888 [ACK] Seq=2380 Ack=31274 Win=128672 Len=0 TSval=449469806 TSecr=12144188
346	6.997935	192.168.1.6	185.148.3.66	UDP	145	33256 → 52370 Len=103
347	7.028029	13.92.143.122	192.168.1.6	HTTP	465	HTTP/1.1 301 Moved Permanently (text/html)
348	7.028543	192.168.1.6	192.168.1.4	TCP	323	[TCP segment of a reassembled PDU]
349	7.028864	192.168.1.6	192.168.1.4	HTTP	220	HTTP/1.1 301 Moved Permanently (text/html)
350	7.068872	192.168.1.6	13.92.143.122	TCP	54	59940 → 80 [ACK] Seq=679 Ack=412 Win=16128 Len=0
351	7.091246	192.168.1.4	192.168.1.6	TCP	66	56846 → 8888 [ACK] Seq=703 Ack=258 Win=131488 Len=0 TSval=449470102 TSecr=12144213
352	7.091247	192.168.1.4	192.168.1.6	TCP	66	56846 → 8888 [ACK] Seq=703 Ack=412 Win=131328 Len=0 TSval=449470102 TSecr=12144213
353	7.129982	192.168.1.4	192.168.1.6	TCP	78	56847 → 8888 [SYN] Seq=0 Win=65535 Len=0 MSS=1460 WS=32 TSval=449470113 TSecr=0 SACK_PERM=1
354	7.130143	192.168.1.6	192.168.1.4	TCP	74	8888 → 56847 [SYN, ACK] Seq=0 Ack=1 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1 TSval=12144223 TSecr=4494701…
355	7.137675	192.168.1.4	192.168.1.6	TCP	66	56847 → 8888 [ACK] Seq=1 Ack=1 Win=131744 Len=0 TSval=449470147 TSecr=12144223
356	7.147994	192.168.1.4	192.168.1.6	HTTP	332	CONNECT www.rexnord.com:443 HTTP/1.1
357	7.149501	192.168.1.6	192.168.1.1	DNS	75	Standard query 0xeb9a A www.rexnord.com
358	7.181443	192.168.1.6	192.168.1.1	DNS	75	Standard query 0xeb9a A www.rexnord.com

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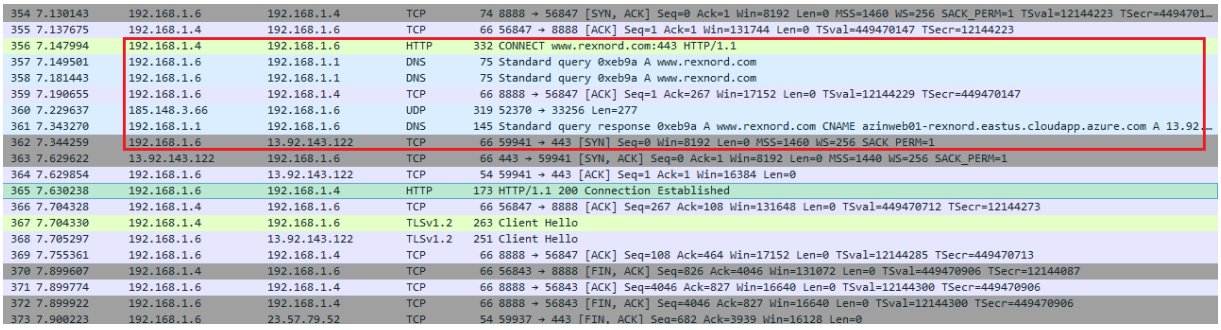
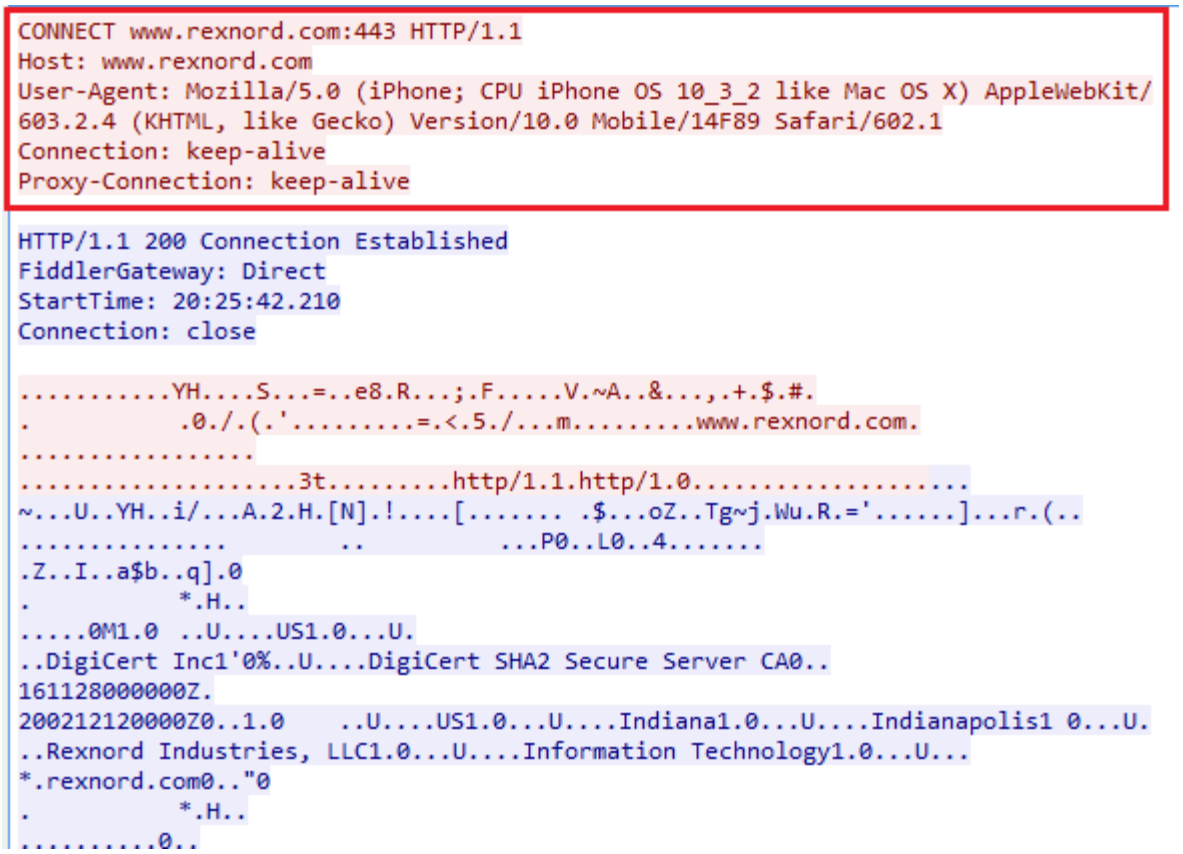
GET /P4B207T?SELLSHEET HTTP/1.1
Host: rexnord.com
Accept: text/html,application/xhtml+xml,application/xml;q=0.9,*/*;q=0.8
Connection: keep-alive
Upgrade-Insecure-Requests: 1
Cookie: VisitorStatus=21060557865; _ga=GA1.2.1031779231.1497464345;
_gid=GA1.2.1136967877.1497889501; CurrentLanguageId=a26095ef-c714-e311-ba31-
d43d7e4e88b2; SetContextLanguageCode=en-us; CMSPreferredCulture=en-US;
CurrentContact=3719d74b-f467-4d47-930a-675fe991fb04
User-Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 10_3_2 like Mac OS X) AppleWebKit/
603.2.4 (KHTML, like Gecko) Version/10.0 Mobile/14F89 Safari/602.1
Accept-Language: en-us
Accept-Encoding: gzip, deflate
Connection: keep-alive

HTTP/1.1 301 Moved Permanently
Content-Type: text/html; charset=UTF-8
Location: https://www.rexnord.com/P4B207T
Server: Microsoft-IIS/8.5
X-Powered-By: ASP.NET
Access-Control-Allow-Origin: *
Date: Tue, 20 Jun 2017 03:25:42 GMT
Content-Length: 154

<head><title>Document Moved</title></head>
<body><h1>Object Moved</h1>This document may be found <a HREF="https://
www.rexnord.com/P4B207T">here</a></body>
```

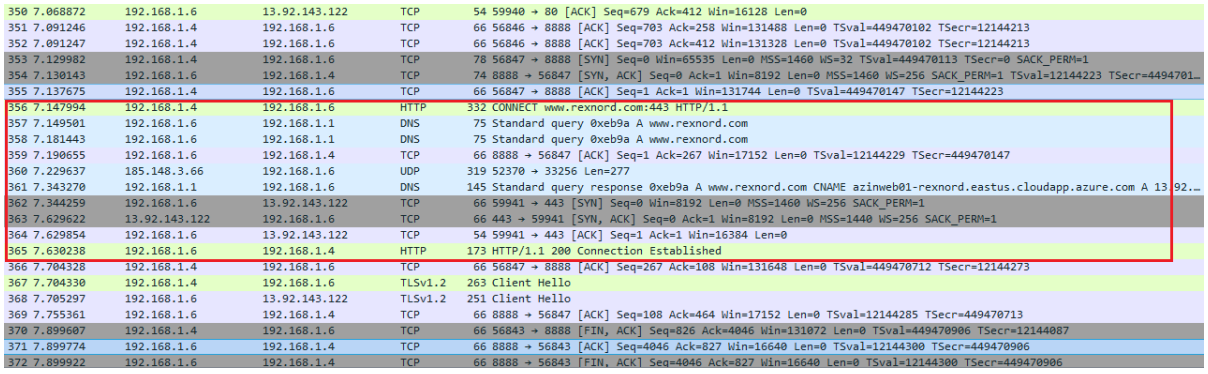


354	7.130143	192.168.1.6	192.168.1.4	TCP	74	8888 → 56847 [SYN, ACK] Seq=0 Ack=1 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1 TSval=12144223 TSecr=4494701…
355	7.137675	192.168.1.4	192.168.1.6	TCP	66	56847 → 8888 [ACK] Seq=1 Ack=1 Win=131744 Len=0 TSval=449470147 TSecr=12144223
356	7.147994	192.168.1.4	192.168.1.6	HTTP	332	CONNECT www.rexnord.com:443 HTTP/1.1
357	7.149501	192.168.1.6	192.168.1.1	DNS	75	Standard query 0xeb9a A www.rexnord.com
358	7.181443	192.168.1.6	192.168.1.1	DNS	75	Standard query 0xeb9a A www.rexnord.com
359	7.190655	192.168.1.6	192.168.1.4	TCP	66	8888 → 56847 [ACK] Seq=1 Ack=267 Win=17152 Len=0 TSval=12144229 TSecr=449470147
360	7.229637	185.148.3.66	192.168.1.6	UDP	319	52370 → 33256 Len=277
361	7.343270	192.168.1.1	192.168.1.6	DNS	145	Standard query response 0xeb9a A www.rexnord.com CNAME azinweb01-rexnord.eastus.cloudapp.azure.com A 13.92…
362	7.344259	192.168.1.6	13.92.143.122	TCP	66	59941 → 443 [SYN] Seq=0 Win=8192 Len=0 MSS=1460 WS=256 SACK_PERM=1
363	7.629622	13.92.143.122	192.168.1.6	TCP	66	443 → 59941 [SYN, ACK] Seq=0 Ack=1 Win=8192 Len=0 MSS=1440 WS=256 SACK_PERM=1
364	7.629854	192.168.1.6	13.92.143.122	TCP	54	59941 → 443 [ACK] Seq=1 Ack=1 Win=16384 Len=0
365	7.630238	192.168.1.6	192.168.1.4	HTTP	173	HTTP/1.1 200 Connection Established
366	7.704328	192.168.1.4	192.168.1.6	TCP	66	56847 → 8888 [ACK] Seq=267 Ack=108 Win=131648 Len=0 TSval=449470712 TSecr=12144273
367	7.704330	192.168.1.4	192.168.1.6	TLSv1.2	263	Client Hello
368	7.705297	192.168.1.6	13.92.143.122	TLSv1.2	251	Client Hello
369	7.755361	192.168.1.6	192.168.1.4	TCP	66	8888 → 56847 [ACK] Seq=108 Ack=464 Win=17152 Len=0 TSval=12144285 TSecr=449470713
370	7.899607	192.168.1.4	192.168.1.6	TCP	66	56843 → 8888 [FIN, ACK] Seq=826 Ack=4046 Win=131072 Len=0 TSval=449470906 TSecr=12144087
371	7.899774	192.168.1.6	192.168.1.4	TCP	66	8888 → 56843 [ACK] Seq=4046 Ack=827 Win=16640 Len=0 TSval=12144300 TSecr=449470906
372	7.899922	192.168.1.6	192.168.1.4	TCP	66	8888 → 56843 [FIN, ACK] Seq=4046 Ack=827 Win=16640 Len=0 TSval=12144300 TSecr=449470906
373	7.900223	192.168.1.6	23.57.79.52	TCP	54	59937 → 443 [FIN, ACK] Seq=682 Ack=3939 Win=16128 Len=0



36. 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:

37. 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.



Claim 8

38. 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.

39. Defendant infringes claim 8.

40. 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).

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

42. 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.

43. 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).

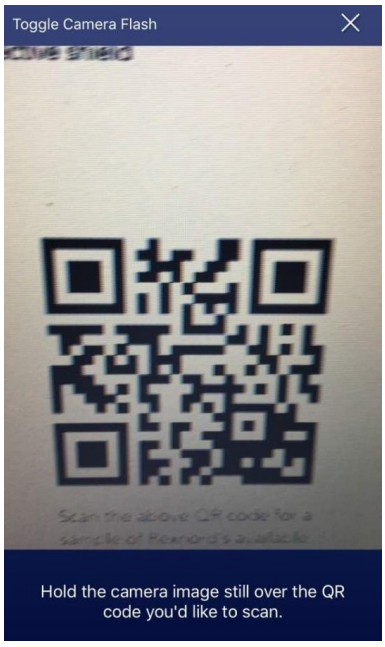
44. Defendant uses a user terminal comprising a transceiver (*e.g.*, FDD- LTE/TDD -

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	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)



Claim 9

45. 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.

46. Defendant infringes claim 9.

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

Claim 10

48. 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.

49. Defendant infringes claim 10.

50. 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).

51. 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

52. 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.

53. Defendant infringes claim 11.

54. 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.

55. 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.

56. 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

57. 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.

58. Defendant infringes claim 15.

59. 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).

60. 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).

61. 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.

62. 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).

63. 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

64. 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.

65. Defendant infringes claim 16.

66. 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).

67. 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).

68. 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.

69. 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).

70. 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.

71. 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.

72. 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.

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

74. 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, REXNORD CORPORATION, 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 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 July 6, 2018

Respectfully submitted,

STAMOULIS & WEINBLATT, LLC

/s/ Stamatios Stamoulis

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