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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

CODING TECHNOLOGIES, LLC,  
Plaintiff,  
vs.  
DRISCOLL’S INC.,  
Defendant.

**Case No.:**  
**COMPLAINT FOR PATENT**  
**INFRINGEMENT**  
**JURY TRIAL DEMANDED**

Plaintiff, CODING TECHNOLOGIES, LLC, sues Defendant, DRISCOLL’S INC., 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.

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1 users with access to and use of various content more conveniently. Traditionally, companies  
2 simply provided their URL information to the consuming public, but this is effective only if a  
3 consumer memorized the name and spelling of the URL. Thus, there was a need in the art to  
4 provide an effective product or method to assist consumers with recalling website or URL  
5 information.

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

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

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

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

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

27 17. The Accused Products infringe at least claims 1, 2, 3, 8, 9, 10, 15, and 16 of the  
28 ‘159 Patent.

*Claim 1*

18. 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.

19. Defendant infringes claim 1.

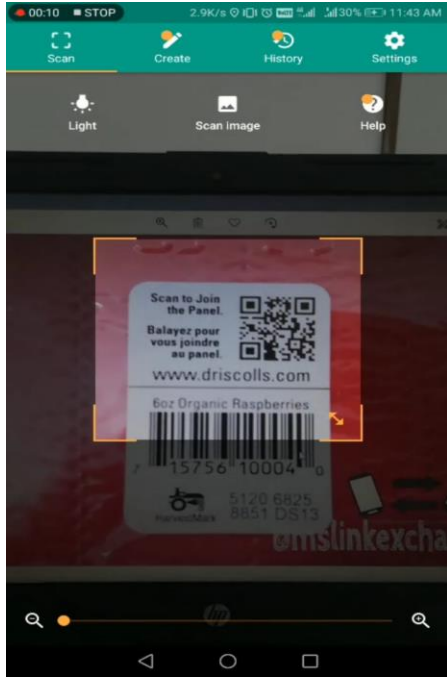
20. Defendant, at least in internal use and testing, practices a method of providing content (e.g., a web page associated with the defendant) with the use of a code pattern (e.g., a QR code) by a user terminal (e.g., a smartphone), as demonstrated in the following images:



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21. 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).

22. 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.

23. 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:



24. Defendant, at least in internal use and testing, transmits a content information

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1 request message (e.g., http request message for accessing the webpage associated with  
2 Defendant) to a server (e.g., Defendant’s server) based on the code information (e.g., URL of the  
3 webpage associated with Defendant). Once the URL is decoded from the extracted QR code, a  
4 request for accessing a webpage associated with Defendant is sent to Defendant’s server.

5 25. Defendant, at least in internal use and testing, receives content information (e.g., a  
6 web page associated with Defendant) from the server (e.g., Defendant’s server) in response to  
7 the content information request message (e.g., http request message for accessing the webpage  
8 associate with Defendant). The terminal (e.g., smartphone) receives content information (e.g.,  
9 webpage associated with Defendant).

10 **Claim 2**

11 26. Through claim 2, the ‘159 Patent claims the method of claim 1, wherein the  
12 content information comprises at least one of the following: image, sound, moving picture, and  
13 text data.

14 27. Defendant infringes claim 2.

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

17 **Claim 3**

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

22 30. Defendant infringes claim 3.

23 31. Defendant transmits a content information request message (e.g., http request  
24 message for accessing the webpage associate with Defendant) which includes extracting URL of  
25 the server and transmitting the content information request message (e.g., http request message  
26 for accessing the webpage associate with Defendant) to the server (e.g., Defendant’s server)  
27 based on the extracted URL.  
28

*Claim 8*

32. 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.

33. Defendant infringes claim 8.

34. 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).

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

36. 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.

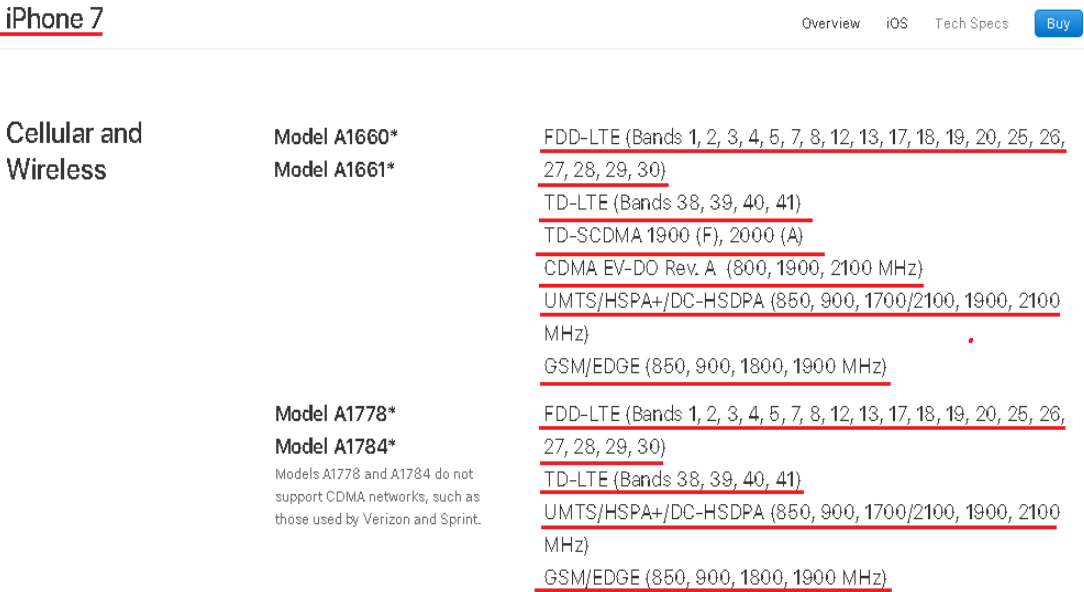
37. Defendant uses a user terminal (e.g., smartphone) comprising a decoder that is configured to decode the extracted code pattern (e.g., QR code) into code information (e.g., URL of web page associated with Defendant).

38. 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

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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:



**Claim 9**

39. 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.

40. Defendant infringes claim 9.

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

**Claim 10**

42. 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.

43. Defendant infringes claim 10.

44. 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

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1 information (*e.g.*, URL of web page associated with Defendant).

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

6 ***Claim 15***

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

17 47. Defendant infringes claim 15.

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

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

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

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

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1           60. Defendant’s acts of infringement of the ‘159 Patent have caused and will continue  
2 to cause Plaintiff damages for which Plaintiff is entitled to compensation pursuant to 35 U.S.C. §  
3 284.

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

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

9           63. Plaintiff retained the law firm of WATSON LLP to represent its interests in this  
10 action and is obligated to pay such firm reasonable attorneys’ fees for its services. Plaintiff may  
11 recover its attorneys’ fees and costs from Defendant, pursuant to 35 U.S.C. § 285, because this  
12 case is exceptional.

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

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27 **DATED** on January 4, 2019  
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Respectfully submitted,

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