

1 Coleman W. Watson, Esq.
2 coleman@watsonllp.com
3 California Bar No.: 266015
4 *Attorneys for Plaintiff, Coding Technologies, LLC*
5 Watson LLP
6 189 S. Orange Avenue, Ste. 810
7 Orlando, FL 32801
8 Tel: (407) 377-6634
9 Fax: (407) 377-6688

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CODING TECHNOLOGIES, LLC,
Plaintiff,
vs.
ZEGO INC.,
Defendant.

Case No.:

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

Plaintiff, CODING TECHNOLOGIES, LLC, sues Defendant, ZEGO 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.

WATSON LLP
189 S. Orange Avenue, Suite 810
Orlando, FL 32801
Telephone: 407.377.6634

1 3. Defendant, ZEGO INC., is a domestic corporation with its headquarters located in
2 San Francisco, California. Defendant uses, sells, and/or offers to sell products and services in
3 interstate commerce that infringe the ‘159 Patent.

4 **SUBJECT MATTER JURISDICTION**

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

8 **PERSONAL JURISDICTION**

9 5. The court has general *in personam* jurisdiction over Defendant because Defendant
10 is a citizen of the State of California.

11 **VENUE**

12 6. Venue is proper in this court, pursuant to 28 U.S.C. § 1400(b), because Defendant
13 has a regular and established place of business in this district and resides in this district.

14 **INTRADISTRICT ASSIGNMENT**

15 7. Pursuant to Local Civil Rule 3-2(d), this action is properly assigned to the San
16 Jose Division because a substantial part of the events or omissions giving rise to this action
17 occurred in San Francisco County, California.

18 **COUNT I**

19 **PATENT INFRINGEMENT**

20 8. Plaintiff repeats and re-alleges paragraphs 2 through 7 by reference, as if fully set
21 forth herein.

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

26 10. The ‘159 Patent teaches a method and apparatus for providing a mobile service
27 with the use of code pattern.

28 11. The ‘159 Patent is directed to computerized decoding technologies to provide

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.

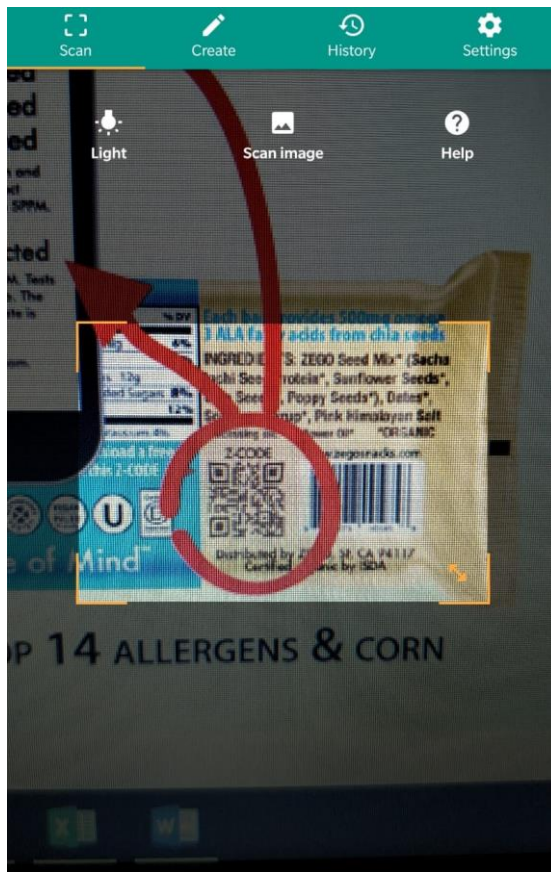
19. Defendant infringes claim 1.

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:



WATSON LLP
 189 S. Orange Avenue, Suite 810
 Orlando, FL 32801
 Telephone: 407.377.6634

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



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:



1 24. Defendant, at least in internal use and testing, transmits a content information
2 request message (*e.g.*, http request message for accessing the webpage associated with
3 Defendant) to a server (*e.g.*, Defendant’s server) based on the code information (*e.g.*, URL of the
4 webpage associated with Defendant). Once the URL is decoded from the extracted QR code, a
5 request for accessing a webpage associated with Defendant is sent to Defendant’s server.

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

11 ***Claim 2***

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

15 27. Defendant infringes claim 2.

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

18 ***Claim 3***

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

23 30. Defendant infringes claim 3.

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
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 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

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 claim 10, 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

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 45. 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 15***

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

18 47. Defendant infringes claim 15.

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

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

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

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

1 with Defendant).

2 52. Defendant, at least in internal use and testing, transmits and receives a content
3 information request message (*e.g.*, http request message for accessing the webpage associated
4 with Defendant) to and from a server (*e.g.*, Defendant's server) based on the code information
5 (*e.g.*, URL of the webpage associated with Defendant).

6 ***Claim 16***

7 53. Through claim 16, the '159 Patent claims a method of providing content with the
8 use of an image captured by a user terminal, the method comprising: obtaining a photographic
9 image by a camera of the user terminal; processing, by a processor of the user terminal, the
10 photographic image to extract characteristic information from the photographic image;
11 transmitting a content information request message with the extracted characteristic information
12 to a server; and receiving content information from the server in response to the content
13 information request message.

14 54. Defendant infringes claim 16.

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

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

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

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

27 59. Upon information and belief, Defendant has known of the existence of the '159
28 Patent, and its acts of infringement have been willful and in disregard for the '159 Patent,

1 without any reasonable basis for believing that it had a right to engage in the infringing conduct.

2 60. Defendant's acts of infringement of the '159 Patent have caused and will continue
3 to cause Plaintiff damages for which Plaintiff is entitled to compensation pursuant to 35 U.S.C. §
4 284.

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

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

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

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

27
28 **DATED** on January 7, 2019

WATSON LLP
189 S. Orange Avenue, Suite 810
Orlando, FL 32801
Telephone: 407.377.6634

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

WATSON LLP

/s/ Coleman W. Watson

Coleman W. Watson, Esq.

Florida Bar. No. 0087288

California Bar No. 266015

Georgia Bar No. 317133

New York Bar Reg. No. 4850004

Email: coleman@watsonllp.com

docketing@watsonllp.com

WATSON LLP

189 S. Orange Avenue

Suite 810

Orlando, FL 32801

Telephone: 407.377.6634

Facsimile: 407.377.6688

Attorneys for Plaintiff,

Coding Technologies, LLC