

1 Stephen M. Lobbin (SBN 181195)  
sml@smlavvocati.com  
2 Austin J. Richardson (SBN 319807)  
ajr@smlavvocati.com  
3 **SML AVVOCATI P.C.**  
888 Prospect Street, Suite 200  
4 San Diego, California 92037  
Tel: 949.636.1391

5 Attorneys for Plaintiff  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**  
10  
11  
12

13 **Mortgage Application Technologies,**  
LLC, a Maryland company,  
14  
Plaintiff,  
15  
v.  
16 **MeridianLink, Inc.,** a California  
17 corporation,  
18  
Defendant.

Case No. '19CV0219 GPC BLM

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

19  
20  
21 For its Complaint, Mortgage Application Technologies, LLC (“Plaintiff” or  
22 “MAT”) hereby alleges as follows:

23 **JURISDICTION AND VENUE**

24 1. This is an action including for infringement under the patent laws of the  
25 United States, 35 U.S.C. § 101, *et. seq.* This Court has subject matter jurisdiction  
26 under 28 U.S.C. §§ 1331 and 1338(a).  
27  
28



1 the loan application data is in an Extensible Markup Language (XML) format,  
2 configured to automatically extract the selected loan application data;” (b) “hosting  
3 an automatic decision engine, wherein the automatic decision engine is configured  
4 to automatically process the loan application data and compare the loan application  
5 data to lender underwriting criteria to determine one or more compatible lenders;”  
6 (c) “a database server coupled to the application server, comprising a database pre-  
7 loaded with a PDF generated application form, and configured to receive the  
8 extracted loan application data, further configured to automatically populate a  
9 binary Portable Document Format (PDF) form file with the extracted loan  
10 application data, and further configured to automatically store the binary PDF form  
11 file loan application populated with the extracted XML loan application data for  
12 cross-platform access and viewing;” and (d) “a queue manager server coupled to the  
13 application server and the database server, wherein the queue manager server is  
14 configured to receive the loan application from the application server and wherein  
15 the database server is further configured to poll the queue manager server at  
16 specified periodic intervals and to receive the transfer of the loan application data  
17 from the queue manager server in response to a poll.”

18 10. On information and belief, Defendant has made, used, offered for sale,  
19 sold and/or imported into the United States systems and/or methods covered by the  
20 claims of the ‘902 patent. For example, as shown in the infringement analysis at  
21 Exhibit B, Defendant employs the system covered by Claim 1 of the ‘902 patent.

22 11. On information and belief, Defendant has caused, encouraged and  
23 aided others, including customers, to directly infringe the ‘902 patent having full  
24 knowledge of the ‘902 patent and the specific intent that its acts and the acts of its  
25 customers and/or others to directly and/or indirectly infringe the ‘902 patent.

26 12. By the acts of making, using, offering to sell, selling and/or importing  
27 the accused infringing systems and/or methods, Defendant has directly infringed the  
28 ‘902 patent under 35 U.S.C. § 271(a).



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

D. Such other and further relief as this Court deems just and proper.

Respectfully submitted,

Dated: January 30, 2019

**SML AVVOCATI P.C.**

By: /s/ Stephen M. Lobbin  
Attorneys for Plaintiff

**JURY TRIAL DEMAND**

Pursuant to Fed. R. Civ. P. 38(b)(1) and (c), and L.R. 38-1, Plaintiff hereby demands a jury trial on all the issues in this action so triable of right by a jury.

Respectfully submitted,

Dated: January 30, 2019

**SML AVVOCATI P.C.**

By: /s/ Stephen M. Lobbin  
Attorneys for Plaintiff

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