IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CODING TECHNOLOGIES, LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
CHINA UNIONPAY (USA), LLC	§	
	§	
Defendant.	§	
	§	

COMPLAINT

Plaintiff Coding Technologies, LLC ("Plaintiff" or "CT") files this Complaint against

China Unionpay (USA), LLC ("Defendant" or "Unionpay") for infringement of United States

Patent No. 9,240,008 (the " '008 Patent").

PARTIES AND JURISDICTION

1.   This is an action for patent infringement under Title 35 of the United States

Code. Plaintiff is seeking injunctive relief as well as damages.

2.   Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal

Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising

under the United States patent statutes.

3.   Plaintiff is a Texas limited liability company with a place of business at 1801

NE 123 Street, Suite 314, Miami, FL 33181.

4.   On information and belief, Defendant is a Delaware corporation with a principal

office address of Harborside Plaza 10, Suite 208, Jersey City, NJ 07311. On information and

belief, Defendant may be served through its agent, Cogency Global Inc., 850 New Burton Rd.,

Suite 201, Dover, DE 19904.

5.   This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6.   Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7.   On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 9,240,008)

8.   Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9.   This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq*.

10.   Plaintiff is the owner by assignment of the '008 Patent with sole rights to enforce the '008 Patent and sue infringers.

11.   A copy of the '008 Patent, titled "Method for Providing Mobile Service Using Code-pattern," is attached hereto as Exhibit A.

12.   The '008 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13.   Upon information and belief, at least through internal testing, Defendant has infringed and continues to infringe one or more claims, including at least Claim 9 of the '008 Patent by using and/or incorporating code patterns in connection with its UnionPay Mobile

Payment app, and any other similar products and services controlled by Defendant ("Product"), in a manner covered by one or more claims of the '008 Patent. Defendant has infringed and continues to infringe the '008 Patent in violation of 35 U.S.C. § 271.

14.   Regarding Claim 9, at least through internal use and testing, the Product utilizes a terminal (e.g., smartphone) that comprises a camera configured to capture a code pattern image (e.g., a QR Code) having billing information (e.g., information related to payment of total amount of purchase). Certain aspects of these elements are illustrated in the screenshots below and or those provided in connection with other allegations herein.


Cai Jianbo, CEO of UnionPay International, Li Aihua, President of Bank of China (Canada), and Wei Chengyi, Chairman of Foodymart attended the launching ceremony. Some food and beverage merchants in California, the US, have recently started accepting UnionPay QR code payment too. This is the first time that UnionPay's QR code payment is launched in Canada and the United States. It is expected that the number of merchants accepting UnionPay QR code payment in North America will reach 5,000 within this year.

Source: https://www.unionpayintl.com/en/servicesProducts/products/innovativeProducts/mobilePayment/##
Source: https://www.finextra.com/pressarticle/74482/unionpay-qr-code-payment-debuts-in-north-america

15.   The smartphone includes a camera configured to capture a code pattern image having billing information. For example, the back camera of the terminal is pointed towards the code pattern image to capture the code pattern image, which contains billing information. The code pattern image is generated on a store associate's computer display. The QR code displayed on the associate's computer has, embedded therein, billing information (e.g., total amount of purchase). Certain aspects of these elements are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.
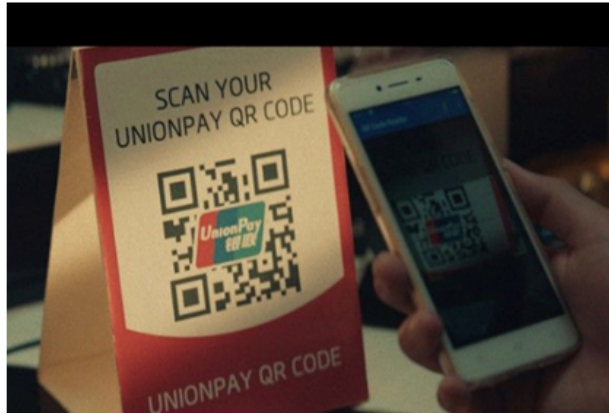
A
The

UnionPay QR code payment offers P2P, P2B and B2B funds receiving and paying as well as value-added serv via QR code. It mainly provides solutions for spending, transferring and cash withdrawal, and has two modes: the Push Mode (customer uses their mobile App to scan the QR code presented by the merchant to initiate the payment) and the Pull Mode (Merchants use QR code reader to scan the QR code in customer's App to initiate the payment).

Source: https://www.unionpayintl.com/en/servicesProducts/products/innovativeProducts/mobilePayment/##
Source: https://www.philstar.com/business/technology/2019/03/18/1899769/how-qr-code-payment-can-help-drive-financial-inclusion-philippines-and-region

16.   The smartphone includes a processor configured to analyze the code pattern image to obtain code information corresponding to the code pattern image obtaining user information and billing information corresponding to the code information associated with a billing database. For example, the terminal utilized by the Product also includes a processor configured to analyze the code pattern image to obtain code information (e.g., information decoded from the QR code) corresponding to the code pattern image. The processor thereby obtain user information (e.g., user's account and payment information) and billing information (e.g., total amount of purchase) corresponding to the code information in reference of a billing database (e.g., billing database associated with user's account). Payment of a bill is processed based on the billing information (e.g., total amount of purchase) and user information (e.g., payment and account information of the smartphone user). Certain aspects of this element are illustrated in the screenshots below and/or screenshots referenced in other paragraphs herein.

ADDITIONAL INFORMATION

Updated	**Size**	**Installs**
June 10, 2019	71M	100,000+
Current Version	**Requires Android**	**Content Rating**
6.3.0	4.1 and up	Rated for 3+
		Learn More
Interactive Elements	**Permissions**	**Report**
Users Interact	View details	Flag as inappropriate
Offered By	**Developer**	
China UnionPay	Visit website	
	ningjunfeng@unionpay.com	
	Privacy Policy	

The   One of the main consumer benefits of a push transaction is that it's **initiated** by the customer. Here, the customer uses their mobile app to scan the QR code presented by the merchant in order to make a payment. Merchants who are directly connected to the UnionPay International Merchant Service Platform can accept this transaction.

Source: https://www.paymentfacilitator.com/business/unionpay-push-qr-code-payment-acceptance-now-available-outside-mainland-china/

17.   Payment of a bill is processed based on the billing information and user information. For example, payment of the bill is processed in reference to the billing database and is based on the billing information (e.g., total amount of purchase) and user information (e.g., user's account information). Certain aspects of this element are illustrated in the screenshots below and/or screenshots referenced in other paragraphs herein.

UnionPay QR code payment offers P2P, P2B and B2B funds receiving and paying as well as value-added services via QR code. It mainly provides solutions for spending, transferring and cash withdrawal, and has two modes: the Push Mode (customer uses their mobile App to scan the QR code presented by the merchant to initiate the payment) and the Pull Mode (Merchants use QR code reader to scan the QR code in customer's App to initiate the payment).

Source: https://www.unionpayintl.com/en/servicesProducts/products/innovativeProducts/mobilePayment/##

18.   Defendant's actions complained of herein will continue unless Defendant is

enjoined by this court.

19.   Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

20.   Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a)   Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b)   Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,240,008 (or, in the alternative, awarding Plaintiff running royalties from the time of judgment going forward);

(c)   Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d)   Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e)   Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: December 27, 2019   Respectfully submitted,

                                            /s/Stamatios Stamoulis
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