

1 Todd C. Atkins (SBN 208879)  
tatkins@atkinsdavidson.com  
2 ATKINS & DAVIDSON, APC  
2261 Rutherford Road  
3 Carlsbad, CA 92008  
Tel: 619.665.3476

4 Matthew M. Wawrzyn (*pro hac vice* pending)  
5 matt@wawrzynlaw.com  
WAWRZYN LLC  
6 2700 Patriot Blvd, Suite 250  
Glenview, IL 60026  
7 Telephone: 847.656.5848

8 *Attorneys for Aftechmobile Inc.*

9

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**

12

13 AFTECHMOBILE INC.,

14 Plaintiff,

15 v.

16 SALESFORCE.COM, INC.,

17 Defendant.  
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Case No. 4:19-cv-05903-JST

**AMENDED COMPLAINT FOR PATENT  
INFRINGEMENT**

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**JURY TRIAL DEMANDED**

**Parties**

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2 1. Plaintiff Aftechmobile Inc. (“Aftechmobile”), is a corporation organized under the  
3 laws of Virginia with a principal place of business located in Ashburn, Virginia.

4 2. Defendant Salesforce.com, Inc. is a corporation organized under the laws of  
5 Delaware with a principal place of business located in San Francisco, California.  
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7 **Jurisdiction and Venue**

8 3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et*  
9 *seq.*

10 4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331  
11 and 1338(a).

12 5. This Court may exercise personal jurisdiction over Salesforce. Salesforce conducts  
13 continuous and systematic business in California and in this District. Salesforce’s principal place  
14 of business is located in this District. These patent infringement claims arise directly from  
15 Salesforce’s continuous and systematic activity in this District. In short, this Court’s exercise of  
16 jurisdiction over Salesforce would be consistent with the California long-arm statute and  
17 traditional notions of fair play and substantial justice.  
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19 6. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b).

20 7. The patents-in-suit, U.S. Patent Nos. 10,133,558 (the “‘558 patent”) and 8,813,028  
21 the “‘028 patent), claim patent-eligible subject matter. To begin with, the claims of the ‘558  
22 patent and the ‘028 patent are directed to a computer product that allows a non-technical user to  
23 create mobile software applications that are adaptable based on the user’s behavior and are  
24 dynamically linked to a backend. The patents-in-suit identify five problems in the prior art and  
25 the patent claims are directed to solving these five problems. First, mobile computer programs  
26 taught in the prior art were inflexible, meaning that these programs and applications failed to  
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1 efficiently work across a plurality of devices. (Declaration of Arshad Farooqi ¶ 3, Ex. A (“We  
2 need a platform (mPass) to develop enterprise mobile apps that can be deployed across different  
3 mobile platforms and also integrated with backend applications and third party APIs.”).)<sup>1</sup>

4           8.       Second, prior art applications were too expensive because the prior art could only  
5 be developed and distributed by a limited number of individuals and businesses, who had  
6 technical expertise in programing languages and other applicable areas of computer science. (*Id.* ¶  
7 3, Ex. A (“In light of the complexity involved in building enterprise apps, we see a need for a  
8 development framework to accelerate the overall time to development and deployment of these  
9 apps.”) Third, the prior art was static: “Conventional mobile development platforms typically  
10 allow users to develop mobile applications of a particular type that cannot be configured or  
11 changed and therefore limit the development and utilization of various features and specific  
12 functions included in mobile devices and their respective mobile operating systems.” (‘028, col.  
13 1:55-60.) Fourth, the prior art was single-layer rather than hierarchical, lacking backend  
14 integration that could be leveraged by the non-technical user. (Declaration of Arshad Farooqi ¶ 3,  
15 Ex. A (“When writing apps for modern smartphones to connect to enterprise backend  
16 applications, there are several areas of effort in building the full app. You need to connect to the  
17 backend application, generally through some web service protocol. You need to retrieve the  
18 payload data from that backend. The data needs to be parsed into a consumable form.”).)

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22           9.       Fifth, the prior art failed to adapt to the context of the software’s use.

23           10.       The patents-in-suit teach one of ordinary skill in the art precisely how to solve the  
24 five problems present in the prior art. First, the software provided in the patents-in-suit is flexible  
25 and portable across a plurality of devices: “wherein said mobile application creation interface is

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<sup>1</sup> The Farooqi Declaration is attached as “Exhibit 1.”

1 accessible at the user device via the network to download and deploy mobile apps in any mobile  
2 interface, device or wearables . . . .” (‘028, col. 32:38-42 (Claim 1); *see also* ‘028, col. 7:29-41;  
3 *id.*, col. 9:19-22; *id.*, col. 11:46-12:6; *id.*, col. 23:25-36; *id.*, col. 27-31-40.) The solution’s  
4 flexibility is taught throughout the written description and the claims, and the examples quoted  
5 and cited in this Amended Complaint are illustrative and non-exhaustive.

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7 11. Second, the patents-in-suit teach a more “user friendly” mobile app creation  
8 system that is cheaper and easier to deploy: “wherein said pre-coded software components are  
9 fully developed applications that can be assembled to build apps in the mobile application  
10 creation interface . . . .” (‘028, col. 32:35-38 (Claim 1); *see also* ‘028, col. 7:59-8:16; *id.*, col.  
11 23:55-24:4; (Declaration of Arshad Farooqi ¶ 4, Ex. B (“Once users drag and drop the leads  
12 object, the user should see a list of Leads (already created). Display lead names. On the header,  
13 include + (to create) and search buttons.”).) The solution’s ease of use is taught throughout the  
14 written description and the claims, and the examples quoted and cited in this Amended Complaint  
15 are illustrative and non-exhaustive.

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17 12. Third, the patents-in-suit teach a system of mobile app development that is more  
18 dynamic and adaptable to the particular needs of an individual or business: “wherein said pre-  
19 coded software components dynamically create multiple pages within said pre-coded software  
20 components based on data a mapping defined by a user . . . dynamically mapping said data to be  
21 rendered in said mobile application with one or more of a plurality of data sources . . . creating  
22 one or more composite software components by combining more than one of distinct software  
23 components selected from a plurality of component sources . . . .” (‘028, col. 32:47-65 (Claim 1);  
24 (Declaration of Arshad Farooqi ¶ 5, Ex. C (“The same widget will show different data sets based  
25 on the mapping. We can predefine biz rules such as users can select only from an existing  
26 customer types etc.”).) The solution’s dynamism is taught throughout the written description and  
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1 the claims, and the examples quoted and cited in this Amended Complaint are illustrative and  
2 non-exhaustive.

3 13. Fourth, the patents-in-suit disclose a hierarchical array facilitated by integrated  
4 backend databases: “adaptively configuring one or more application programming interfaces for a  
5 backend integration of said mobile application with said user device . . . .” (‘028, col. 32:47-65  
6 (Claim 1); *see also* ‘028, col. 23:46-24:4; (Declaration of Arshad Farooqi ¶ 5, *see generally* Ex.  
7 C).) The solution’s hierarchical array is taught throughout the written description and the claims,  
8 and the examples quoted and cited in this Amended Complaint are illustrative and non-  
9 exhaustive.  
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11 14. Fifth, the claims and specification disclose a system that creates mobile apps that  
12 learn based on the contextual behavior of the user: “generating one or more recommendations for  
13 addition of one or more characteristic objects associated with said mobile application . . . based  
14 on real time analysis and dynamic learning of selective data . . . .” (‘028, col. 33:11-16 (Claim 1);  
15 (Declaration of Arshad Farooqi ¶ 5, *see generally* Ex. C).) The solution’s machine-learning  
16 element is taught throughout the written description and the claims, and the examples quoted and  
17 cited in this Amended Complaint are illustrative and non-exhaustive.  
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19 15. On June 19, 2014, the Supreme Court of the United States decided its seminal case  
20 construing section 101 of the Patent Act, *Alice Corp. v. CLS Bank International*. Subsequently,  
21 on August 19, 2014, the ‘028 patent issued. Later still, on November 20, 2018, the ‘558 patent  
22 issued. The United States Patent Office did *not* reject any claims based on section 101 during the  
23 prosecution of the ‘028 patent and the ‘558 patent.  
24

25 **Count 1 – Infringement of U.S. Patent No. 10,133,558**

26 16. Aftechmobile offered to sell the ‘558 patent to Salesforce. As part of this offer,  
27 Aftechmobile shared with Salesforce both the ‘558 patent and the market that the ‘558 patent  
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1 covers. Based on this offer and the materials Aftechmobile shared with Salesforce, Salesforce  
2 gained knowledge of the ‘558 patent, specific knowledge that the App Cloud Mobile service is  
3 especially adapted to infringe claims of the ‘558 patent, and a specific intent that sale of the App  
4 Cloud service to Salesforce customers would cause these Salesforce customers to infringe claims  
5 of the ‘558 patent.

6  
7 17. Aftechmobile is the exclusive owner of United States Patent No. 10,133,558 (the  
8 “‘558 patent”).

9 18. The ‘558 patent is valid and enforceable.

10 19. Salesforce has and is directly infringing at least one of the 28 claims of the ‘558  
11 patent. Salesforce has made and sold and is making and selling the App Cloud Mobile service,  
12 which, among other things, practices claims of the ‘558 patent. Without limiting the claims that  
13 will be asserted or the products that will be accused of infringement in this action, Salesforce  
14 infringes claim 5 of the ‘558 patent by making and selling the App Cloud Mobile service.  
15 Salesforce delivers the accused App Cloud Mobile service through software within the  
16 possession, custody, and control of Salesforce. To deliver the App Cloud Mobile service,  
17 Salesforce does *not* rely on hardware, software, or firmware within the possession, custody, or  
18 control of Salesforce product users. As demonstrated below, the App Cloud Mobile software  
19 practices each step of the methods claimed in the ‘558 patent. As demonstrated below, the App  
20 Cloud Mobile software, hardware, firmware, all within the possession, custody, or control of  
21 Salesforce, embodies each component of apparatuses and systems claimed in the ‘558 patent.  
22 According to the End User License Agreement, Salesforce owns and controls the App Cloud  
23 Mobile service and application and associated software, granting a license to the software to the  
24 Salesforce user.

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27 20. Claim 5’s method starts, “receiving a selection of a plurality of pre-coded software  
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1 components, wherein said pre-coded software components are provided by a mobile application  
2 development software accessible from a user device via a network, and wherein said pre-coded  
3 software components are fully developed mobile applications executable by at least one processor  
4 . . . .” Salesforce states the following about App Cloud Mobile: “App Cloud Mobile offers the  
5 flexibility developers need to build fully custom, scalable apps for customers with code, and  
6 provides drag-and-drop technology so that business users can easily create model-driven apps.”  
7  
8 (*See* Claim Chart attached as “Exhibit 2.”)

9         21. Claim 5 continues, “creating a new mobile application by launching a mobile  
10 application creation interface in said user device, wherein said creation of said new mobile  
11 application comprises . . . .” Salesforce made the following statement about the accused service:  
12 “Create powerful enterprise apps with clicks or code . . . With App Cloud Mobile . . . everyone  
13 can build mobile. Lightning-ready enterprise apps, workflows, and data schemes quickly . . . .”  
14  
15 (*Id.*)

16         22. Claim 5 includes, “inserting one or more of said pre-coded software components  
17 into said launched mobile application creation interface; assembling said inserted one or more of  
18 said pre-coded software components . . . .” Salesforce describes *inserting one or more of said pre-*  
19 *coded software components into said launched mobile application creation interface* as “drag-  
20 and-drop app creation.” Salesforce describes *assembling said inserted one or more of said pre-*  
21 *coded software components* as “self-contained, reusable application components (Lightning  
22 components).” (*Id.*)

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24         23. Claim 5 continues, “using, by said mobile application development software, one  
25 or more adaptively configured application programming interfaces for a backend integration of  
26 said new mobile application with said user device for operating said new mobile application on  
27 said user device . . . .” Salesforce admits the following, “Salesforce1 Mobile App leverages the  
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1 complete integration capability of App Cloud through Salesforce Connect, REST, SOAP and  
2 Streaming APIs, and IoT data sources through REST or IoT Gateways.” (*Id.*)

3         24. Claim 5 includes the step of “connecting, by said mobile application development  
4 software, to a plurality of backend databases via said network for creating one or more enhanced  
5 applications . . . .” Salesforce admits that the accused service includes, “Integration to back-end  
6 systems through Salesforce Connect or Apex.” (*Id.*)

7  
8         25. Claim 5: “providing, by said mobile application development software, direct  
9 access to one or more of web services or said one or more adaptively configured application  
10 programming interfaces from a web address . . . .” Salesforce states, “Salesforce Connect  
11 provides data-by-reference via the industry-standard OData protocol.” (*Id.*)

12         26. Claim 5 requires, “providing said new mobile application from said user device to  
13 an application store for publishing and distribution, wherein other users can download said new  
14 mobile application by accessing said application store directly from their user devices.”  
15 Salesforce admits, “Easily publish your app for employees to download from the App Store and  
16 Google Play.” (*Id.*)

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18         27. Based on the allegations of paragraphs 19 through 26, Salesforce directly infringes  
19 Claim 5 of the ‘558 patent. The Salesforce customer of App Cloud Mobile service also performs  
20 each step of the Claim 5 method. Aftechmobile offered to sell the ‘558 patent to Salesforce. As  
21 part of this offer, Aftechmobile shared with Salesforce both the ‘558 patent and the market that  
22 the ‘558 patent covers. Based on this offer and the materials Aftechmobile shared with  
23 Salesforce, Salesforce gained knowledge of the ‘558 patent, specific knowledge that the App  
24 Cloud Mobile service is especially adapted to infringe claims of the ‘558 patent, and a specific  
25 intent that sale of the App Cloud service to Salesforce customers would cause these Salesforce  
26 customers to infringe claims of the ‘558 patent. As such, Salesforce contributorily infringes Claim  
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1 5 of the 558 patent, and Salesforce induces its customers to infringe Claim 5 of the ‘558 patent.

2 **Count 2 – Infringement of U.S. Patent No. 8,813,028**

3 28. Aftechmobile is the exclusive owner of United States Patent No. 8,813,028 (the  
4 “‘028 patent”). ,

5 29. The ‘028 patent is valid and enforceable.

6 30. Salesforce has and is directly infringing at least one of the 25 claims of the ‘028  
7 patent. Salesforce has made and sold and is making and selling the App Cloud Mobile service,  
8 which, among other things, practices claims of the ‘028 patent. Without limiting the claims that  
9 will be asserted or the products that will be accused of infringement in this action, Salesforce  
10 infringes claim 1 of the ‘028 patent by making and selling the App Cloud Mobile service.  
11

12 31. Claim 1’s method starts, “providing a mobile application development software  
13 executable by at least one processor configured to create said mobile application, wherein said  
14 mobile application development software is accessible by said user device via a network . . . .”  
15 Salesforce states the following about App Cloud Mobile: “App Cloud Mobile offers the flexibility  
16 developers need to build fully custom, scalable apps for customers with code.” (See Claim Chart  
17 attached as “Exhibit 3.”)  
18

19 32. Claim 1 continues, “providing a plurality of pre-coded software components  
20 executable by said at least one processor and encapsulated in a mobile application creation  
21 interface, wherein said precoded software components are fully developed applications that can  
22 be assembled to build apps in the mobile application creation interface, wherein said mobile  
23 application creation interface is accessible at the user device via the network to download and  
24 deploy mobile apps in any mobile interface, device or wearables, wherein said precoded software  
25 components are adaptable based on context and behavioral elements, wherein said precoded  
26 software components comprise hierarchical layers of data, interactive elements configured to  
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1 enable interactions with said data, and predetermined criteria, and wherein said pre-coded  
2 software components dynamically create multiple pages within said pre-coded software  
3 components based on data and mapping defined by a user. . . .” Salesforce made the following  
4 statement about the accused service: “Create powerful enterprise apps with clicks or code . . .  
5 With App Cloud Mobile and Force.com, everyone can build mobile, Lightning-ready enterprise  
6 apps. Business users click to assemble apps, workflows, and data schemas quickly — while  
7 developers gain powerful new ways to use their favorite languages and frameworks.” (*Id.*)  
8 Enterprise apps, by definition, “comprise hierarchical layers of data, interactive elements  
9 configured to enable interactions with said data, and predetermined criteria, and wherein said pre-  
10 coded software components dynamically create multiple pages within said pre-coded software  
11 components based on data and mapping defined by a user.”

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14 33. Claim 1 includes, “dynamically mapping said data to be rendered in said mobile  
15 application with one or more of a plurality of data sources by said mobile application  
16 development software . . . .” Salesforce states that its service, “Salesforce Connect for real-time  
17 access to external data sources.” (*Id.*)

18  
19 34. Claim 1 continues, “receiving a selection of one of preconfigured user interfaces  
20 and a list of predefined user interfaces from said user device by said mobile application  
21 development software via said network for launching said mobile application creation interface;  
22 receiving an indication of each of one or more of said precoded software components from said  
23 user device, by said mobile application development software via said network . . . .” Salesforce  
24 admits the following, “Salesforce1 Mobile App leverages the complete integration capability of  
25 App Cloud through Salesforce Connect, REST, SOAP and Streaming APIs, and IoT data sources  
26 through REST or IoT Gateways.” (*Id.*) “Salesforce1 Mobile App uses Lightning App Builder and  
27 Lightning Process Builder to rapidly create single-page mobile apps that leverage built-in  
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1 workflow capabilities of Force.com.” (*Id.*)

2           35.       Claim 1 includes the step of “creating one or more composite software  
3 components by combining more than one of distinct software components selected from a  
4 plurality of component sources and/or said pre-coded software components by said mobile  
5 application development software. . . .” Salesforce describes, among other services, Salesforce  
6 Mobile App (S1) as creating one or more composite software components by combining more  
7 than one of distinct software components selected from a plurality of component sources and/or  
8 said pre-coded software components by said mobile application development software. (*Id.*)

9  
10           36.       Claim 1: “receiving inputs from said user for inserting one or more of said each of  
11 said one or more of said precoded software components and said created one or more composite  
12 software components into said launched mobile application creation interface on said user device  
13 by said mobile application development software wherein said received inputs comprise inputs  
14 for dragging and dropping one or more of said each of said one or more of said pre-coded  
15 software components and said created one or more composite software components.” Salesforce  
16 describes *wherein said received inputs comprise inputs for dragging and dropping one or more of*  
17 *said each of said one or more of said pre-coded software components and said created one or*  
18 *more composite software components* as “drag-and-drop app creation.” Salesforce describes  
19 *receiving inputs from said user for inserting one or more of said each of said one or more of said*  
20 *pre-coded software components and said created one or more composite software components*  
21 *into said launched mobile application creation interface on said user device by said mobile*  
22 *application development software* as “self-contained, reusable application components (Lightning  
23 components).” (*Id.*)

24           37.       Claim 1: “generating one or more recommendations for addition of one or more  
25 characteristic objects associated with said mobile application by said mobile application  
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1 development software based on a real time analysis and dynamic learning of selective data of  
2 similar mobile applications developed based on one or more of functionality, an industry, and a  
3 category related to said mobile application. . . .” Salesforce states, “Salesforce Connect provides  
4 data-by-reference via the industry-standard OData protocol.” (*Id.*)

5  
6 38. Claim 1 requires, “adaptively configuring one or more application programming  
7 interfaces for a backend integration of said mobile application with said user device by said  
8 mobile application development software for operating said mobile application on said user  
9 device . . . .” Salesforce states that its service will provide, “Integration to back-end systems  
10 through Salesforce Connect or Apex.” (*Id.*)

11  
12 39. Claim 1: “creating said mobile application in said launched mobile application  
13 creation interface by said mobile application development software using one or more of said  
14 inserted one or more of said each of said one or more of said pre-coded software components and  
15 said created one or more composite software components, said generated one or more  
16 recommendations, said dynamically mapped data, and said adaptively configured one or more  
17 application programming interface.” Salesforce describes some of its integration approaches:  
18 “External Data Sources (including ERP): Odata (Salesforce Connect), SOAP/REST, Messaging,  
19 API + Streaming Data Sources (including IoT): REST, Third-Party IoT Gateway.” (*Id.*)

20  
21 40. Based on the allegations of paragraphs 30 through 39, Salesforce directly infringes  
22 Claim 1 of the ‘028 patent. The Salesforce customer of App Cloud Mobile service also performs  
23 each step of the Claim 1 method. Aftechmobile offered to sell the ‘028 patent to Salesforce. As  
24 part of this offer, Aftechmobile shared with Salesforce both the ‘028 patent and the market that  
25 the ‘028 patent covers. Based on this offer and the materials Aftechmobile shared with  
26 Salesforce, Salesforce gained knowledge of the ‘028 patent, specific knowledge that the App  
27 Cloud Mobile service is especially adapted to infringe claims of the ‘028 patent, and a specific  
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1 intent that sale of the App Cloud service to Salesforce customers would cause these Salesforce  
2 customers to infringe claims of the '028 patent. As such, Salesforce contributorily infringes Claim  
3 1 of the '028 patent, and Salesforce induces its customers to infringe Claim 1 of the '028 patent

4           41. Claim 16 provides, “A computer program product comprising a non-transitory  
5 computer readable storage medium, said non-transitory computer readable storage medium  
6 storing computer program codes that comprise instructions executable by at least one processor,  
7 said computer program codes comprising: a first computer program code for dynamically  
8 mapping data to be rendered in a mobile application with one or more of a plurality of data  
9 sources . . . .” ('028, col. 35:58-65.) The App Cloud Mobile application is a computer program  
10 product comprising a non-transitory computer readable storage medium. App Cloud Mobile  
11 contains the “first computer program code” of Claim 16, which maps data to be rendered in a  
12 mobile application with numerous data sources. For example, the “first computer program code”  
13 in App Cloud Mobile dynamically maps data to be rendered: “Create powerful enterprise apps  
14 with clicks or code . . . With App Cloud Mobile and Force.com, everyone can build mobile,  
15 Lightning-ready enterprise apps. Business users click to assemble apps, workflows, and data  
16 schemas quickly — while developers gain powerful new ways to use their favorite languages and  
17 frameworks.” Salesforce states that its service, “Salesforce Connect for real-time access to  
18 external data sources.”

19           42. Claim 16 further provides, “a second computer program code for receiving a  
20 selection of one of preconfigured user interfaces and a list of predefined user interfaces from a  
21 user device via a network for launching a mobile application creation interface . . . .” ('028, cols.  
22 35:66-36:3.) Salesforce states the following about App Cloud Mobile: “App Cloud Mobile offers  
23 the flexibility developers need to build fully custom, scalable apps for customers with code.”

24           43. Claim 16 further provides, “a third computer program code for receiving an  
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1 indication of each of one or more of a plurality of pre-coded software components from said user  
2 device via said network, wherein said pre-coded software components are fully developed  
3 applications that can be assembled to build apps in the mobile application creation interface,  
4 wherein said mobile application creation interface is accessible at the user device via the network  
5 to download and deploy mobile apps in any mobile interface, device or wearables, wherein said  
6 pre-coded software components are adaptable based on context and behavioral elements, wherein  
7 said pre-coded software components comprise hierarchical layers of data, interactive elements  
8 configured to enable interactions with said data, and predetermined criteria, and wherein said pre-  
9 coded software components dynamically create multiple pages within said pre-coded software  
10 components based on data and mapping defined by a user . . . .” (’028, col. 36:4-22.) Salesforce  
11 describes, among other services, Salesforce1 Mobile App (S1) as creating one or more composite  
12 software components by combining more than one of distinct software components selected from  
13 a plurality of component sources and/or said pre-coded software components by said mobile  
14 application development software.

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16  
17 44. Claim 16 further provides, “a fourth computer program code for creating one or  
18 more composite software components by combining more than one of distinct software  
19 components selected from a plurality of component sources and/or said pre-coded software  
20 components . . . .” (’028, col. 36:23-27.) Salesforce describes this fourth computer program: “self-  
21 contained, reusable application components (Lightning components).”  
22

23 45. Claim 16 further provides, “a fifth computer program code for inserting one or  
24 more of said each of said one or more of said pre-coded software components and said created  
25 one or more composite software components into said launched mobile application creation  
26 interface, wherein said inserting said one or more of said each of said one or more of said pre-  
27 coded software components and said created one or more composite software components  
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1 comprises dragging and dropping said one or more of said each of said one or more of said pre-  
2 coded software components and said created one or more composite software components into  
3 said launched mobile application creation interface . . . .” (’028, col. 36:28-41.) Salesforce  
4 describes, among other services, Salesforce1 Mobile App (S1) as creating one or more composite  
5 software components by combining more than one of distinct software components selected from  
6 a plurality of component sources and/or said pre-coded software components by said mobile  
7 application development software.  
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9       46. Claim 16 further provides, “a sixth computer program code for generating one or  
10 more recommendations for addition of one or more characteristic objects associated with said  
11 mobile application based on a real time analysis and dynamic learning of selective data of similar  
12 mobile applications developed based on one or more of functionality, an industry, and a category  
13 related to said mobile application . . . .” (’028, col. 36:42-48.) “With App Cloud Mobile and  
14 Force.com, everyone can build mobile, Lightning-ready enterprise apps. Business users click to  
15 assemble apps, workflows, and data schemas quickly — while developers gain powerful new  
16 ways to use their favorite languages and frameworks.” (*Id.*) Enterprise apps, by definition,  
17 “comprise hierarchical layers of data, interactive elements configured to enable interactions with  
18 said data, and predetermined criteria, and wherein said pre-coded software components  
19 dynamically create multiple pages within said pre-coded software components based on data and  
20 mapping defined by a user.”  
21

22       47. Claim 16 further provides, “a seventh computer program code for adaptively  
23 configuring one or more application programming interfaces for a backend integration of said  
24 mobile application with said user device for operating said mobile application on said user device  
25 . . . .” (’028, col. 36:49-53.) Salesforce states that its service will provide, “Integration to back-  
26 end systems through Salesforce Connect or Apex.”  
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1 48. Claim 16 ends, “an eighth computer program code for creating said mobile  
2 application in said launched mobile application creation interface using one or more of said  
3 inserted one or more of said each of said one or more of said pre-coded software components and  
4 said created one or more composite software components, said generated one or more  
5 recommendations, said dynamically mapped data, and said adaptively configured one or more  
6 application programming interfaces.” Salesforce describes some of its integration approaches:  
7 “External Data Sources (including ERP): Odata (Salesforce Connect), SOAP/REST, Messaging,  
8 API + Streaming Data Sources (including IoT): REST, Third-Party IoT Gateway.”  
9

10 **Prayer for Relief**

11 WHEREFORE, Aftechmobile prays for the following relief against Salesforce:

- 12 (a) Judgment that Salesforce has directly, contributorily, and by inducement infringed  
13 the ‘558 and ‘028 patents;  
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15 (b) A fair and reasonable royalty;  
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17 (c) Pre-judgment interest and post-judgment interest at the maximum rate allowed by  
18 law;  
19  
20 (d) A post-judgment injunction; and  
21  
22 (e) Such other and further relief as the Court may deem just and proper.

23 **Demand for Jury Trial**

24 Aftechmobile demands a trial by jury on all matters and issues triable by jury.

25 Date: January 29, 2020

/s/ Todd Atkins

Todd C. Atkins (SBN 208879)  
tatkins@atkinsdavidson.com  
ATKINS & DAVIDSON, APC  
2261 Rutherford Road  
Carlsbad, CA 92008  
Tel: 619.665.3476



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Matthew M. Wawrzyn (*pro hac vice* pending)  
*matt@wawrzynlaw.com*  
WAWRZYN LLC  
2700 Patriot Blvd, Suite 250  
Glenview, IL 60026  
Telephone: 847.274.9844  
  
*Attorneys for Aftechmobile Inc.*