**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CODING TECHNOLOGIES, LLC,	§	
	§	
Plaintiff,	§	Case No: 1:19-cv-02365-CFC
	§	
vs.	§	PATENT CASE
	§	
KOFAX, INC.	§	
	§	
Defendant.	§	
	§	

FIRST AMENDED COMPLAINT

Plaintiff Coding Technologies, LLC ("Plaintiff" or "CT") files this First Amended Complaint against Kofax, Inc. ("Defendant" or "Kofax") 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 15211 Laguna Canyon Road, Irvine, CA 92618. On information and belief, Defendant may be served through its agent, Corporation Service Company, 251 Little Falls Dr., Wilmington, DE 19808.

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. Alternatively, Defendant has already appeared in this action and has not challenged *in personam* jurisdiction or venue, which are now waived by operation of law.

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.   On January 19, 2016, the United States Patent & Trademark Office (USPTO) duly and legally issued the '008 Patent.

14.   The '008 Patent teaches a method and apparatus for providing a mobile service with the use of code pattern. The mobile service reads the code pattern and converts the information recorded in the code pattern to produce content that may then be read by the human eye. In one aspect of the invention, a user simply takes a photograph of a code pattern, the invention decodes the photograph and recognizes URL information that is contained in the code pattern that is not recognizable by the human eye, the invention compares the content on the entire URL associated with the code pattern, transmits information to the associated URL, and then retrieves all content associated with that URL that corresponds with the code pattern.

15.   Among other things, the '008 Patent teaches a method and apparatus for enabling the recognition and reading of a code pattern image that includes billing information. The invention provides for analyzing the image to obtain code pattern information that includes user information and billing information corresponding to a billing database. Payment of a bill is processed based on the billing information and user information.

16.   In short, the present invention, through use of technology, eliminates the need for hand typing certain information into a URL, which, inter alia, eliminates the risk of transcription error. The present invention is an improvement in the use of traditional barcodes; rather, the present invention includes the additional step of converting analog information to digital information, which is an improvement in the prior art.

17.   The '008 Patent is directed to computerized decoding technologies to provide users with access to and use of various content more conveniently. Traditionally, companies simply provided their URL information to the consuming public, but this is effective only if a consumer memorized the name and spelling of the URL. Thus, there was a need in the art to provide an effective product or method to assist consumers with recalling website or URL

information.   The '008 Patent provides for automated bill payment based on user information and billing information contained in the code pattern information of a code pattern image, such information being automatically recognized and analyzed.

18.   The '008 Patent claims, among other things, a method of providing content with the use of code pattern by a user terminal; a user terminal for providing content with the use of code pattern; a non-transitory machine-readable storage medium having encoded thereon program code; and, a method of bill payment based on the information contained within the code pattern information of the code pattern image.

19.   Collectively, the claimed embodiments in the '008 Patent provides new solutions to problems related to transmitting information from a mobile service provider to a mobile device.   For example, the inventive concept can be used in a variety of circumstances, including but not limited to transmitting and converting code pattern images to code pattern information containing user and billing information and processing bill payment based upon such information.

20.   The '008 Patent solves a problem with the art that is rooted in computer technology that uses mobile service providers.   The '008 Patent does not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.

21.   The invention claimed by the '008 Patent consists of a system of units that correspond to produce an inventive concept.   The system of units includes a code distribution unit, barcode image analyzing unit, code information analyzing unit, transmitting/receiving unit, code information database managing unit, control unit, photographing unit, and user interface unit.   In laymen's terms, each unit, which collectively interact as a whole to produce a result,

functions as follows:

a.   Code distribution unit – unit that analyzes the service identifier recognizes that a service type is the content providing service, and transmits a received barcode image or code information to the barcode image transmitting unit or the code information analyzing unit according to embodiments;

b.   Barcode image analyzing unit – unit that receives a barcode image photographed by a photographing unit to extract code information from the barcode image and transmit the code information to the code information analyzing unit in a case where a decoder for decoding the barcode is not provided in the user terminal;

c.   Code information analyzing unit – unit that functions to analyze code information received from the code distribution unit or the barcode image analyzing unit and extract the information of a Web page, including content information, from the analyzed code information corresponding to the code information with reference to the code information database storing therein user contact information corresponding to the code information;

d.   Transmitting/receiving unit – unit that functions to receive the content information request message from the user terminal and transmit extracted content information or Web page information to the user terminal;

e.   Code information database managing unit – unit that functions to manage the code information database storing therein the Web page information of a Web server corresponding to the code information;

f.   Control unit – unit that controls the respective components, generates control signals required to control the barcode image analyzing unit and the code information analyzing unit, extracts content corresponding to the received content request message, and transmits the

content to the transmitting/receiving unit;

g.   Photographing unit – unit that is a means for recognizing or photographing an image that functions to recognize (or photograph) the barcode, convert recognized (photographed) analog image data into digital image data, and transmit the digital image data to the decoder;

h.   User interface unit – unit that functions to provide a user interface so that the user can access the service provider server to be provided with Internet content and provides user interface so that the user can access a corresponding Web server when Web page information is received from the service provider server.

22.   The claims of the '008 Patent recite non-generic components and or components that operate in a non-generic manner.

23.   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 Kofax Mobile Bill Pay 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.

24.   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., an image of bill) having billing information (e.g., information related to payment of total amount of purchase). Certain aspects of this element are illustrated in the screenshots below.

Kofax Mobile Bill Pay™ helps your banking customers make bill payments and add payees to their automatic bill pay system quickly and easily. They simply hold their smartphone camera over their bill and Kofax Mobile Bill Pay auto-captures the document and extracts the relevant data in real time. After your customers submit a bill for payment, they can add the new payee to their approved list of billers with just one button click. It's that easy.

Source: https://www.kofax.com/-/media/Files/Datasheets/EN/ps_kofax-mobile-bill-pay_en.pdf

25.   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 (i.e., the bill) to capture the code pattern image (i.e., image of the bill), which contains billing information. The image of the bill has embedded therein billing information (e.g., total amount due). These elements are illustrated in the screenshots below and/or in screenshots provided in connection with other allegations herein.

Kofax Mobile Bill Pay™ helps your banking customers make bill payments and add payees to their automatic bill pay system quickly and easily. They simply hold their smartphone camera over their bill and Kofax Mobile Bill Pay auto-captures the document and extracts the relevant data in real time. After your customers submit a bill for payment, they can add the new payee to their approved list of billers with just one button click. It's that easy.

Source: https://www.kofax.com/-/media/Files/Datasheets/EN/ps_kofax-mobile-bill-pay_en.pdf

26.   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 (i.e., the Product is installed on the smartphone and uses and/or is used by the processor). The processor is configured to analyze the code pattern image to obtain code information (e.g., information decoded from the bill's image) corresponding to the code pattern image. The

processor thereby obtains user information (e.g., billing information of the smartphone user) and billing information (e.g., total amount due) corresponding to the code information in reference of a billing database (e.g., billing database for user's bill). Payment of a bill is processed 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.

Kofax Mobile Bill Pay™ helps your banking customers make bill payments and add payees to their automatic bill pay system quickly and easily. They simply hold their smartphone camera over their bill and Kofax Mobile Bill Pay auto-captures the document and extracts the relevant data in real time. After your customers submit a bill for payment, they can add the new payee to their approved list of billers with just one button click. It's that easy.

Real-time data extraction extracts, corrects and perfects relevant data in real time from the following fields:

- Payee Name
- Payee Address
- Account number
- Payer name
- Payer address
- Amount due
- Due date
- Minimum amount due

Source: https://www.kofax.com/-/media/Files/Datasheets/EN/ps_kofax-mobile-bill-pay_en.pdf

27.   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.

Meet customer expectations by automating the error-prone, manual process of entering payee data into fields, while removing friction from enrolling payees into an automated bill pay system. Your customers can snap a picture of a bill to create a payment transaction in real time and then add the payee to an approved list of billers—with just one click.

Utilizing their smartphone or tablet, customers simply snap a picture of their bill—data is extracted, corrected and perfected by Kofax technology—and information is automatically presented to the user for easy bill payment and payee onboarding. This not only improves customer service and satisfaction, but more importantly, it closely ties users to the bank's mobile and online banking solutions, which has proven to significantly reduce the likelihood of a customer switching banks and delivers a satisfying customer engagement.

Source: https://egpug9fi821blb121w5e3813-wpengine.netdna-ssl.com/wp-content/uploads/Solution-Brief-Kofax-Intelligent-Mobile-Capture-Platform.pdf
Source: https://www.kofax.com/Products/mobile-bill-pay/overview

28.   Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

29.   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.

30.   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: March 6, 2020

Respectfully submitted,

/s/ Stamatios Stamoulis
STAMATIOS STAMOULIS
STAMOULIS & WEINBLATT LLC
800 N. West Street
Third Floor
Wilmington, DE 19801
(302) 999-1540
stamoulis@swdelaw.com

Jay Johnson
Kizzia & Johnson, PLLC
1910 Pacific Ave, Ste 13000
Dallas, TX   75201
(O) 214.451.0164
(F) 214.451.0165

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system March 6, 2020.

/s/Stamatios Stamoulis
STAMATIOS STAMOULIS