

1 STEPHEN M. LOBBIN
sml@smlavvocati.com
2 SML AVVOCATI P.C.
3 888 Prospect Street, Suite 200
San Diego, California 92037
4 (949) 636-1391 (Phone)

5 *Attorney(s) for Plaintiff Coding Technologies, LLC*
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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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13 Coding Technologies, LLC,

14 *Plaintiff,*

15 v.

16 Zuca, Inc.,

17 *Defendant.*
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CASE NO. 5:20-cv-02830

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

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21 Plaintiff Coding Technologies, LLC (“Plaintiff” or “CT”) files this Complaint
22 against Zuca, Inc. (“Defendant” or “Zuca”) for infringement of United States Patent
23 No. 8,540,159 (“the ‘159 Patent”) and alleges as follows:
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25 **PARTIES AND JURISDICTION**

26 1. This is an action for patent infringement under Title 35 of the United
27 States Code. Plaintiff is seeking injunctive relief as well as damages.
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1 10. Plaintiff is the owner by assignment of the ‘159 Patent with sole rights
2 to enforce the ‘159 Patent and sue infringers.

3 11. A copy of the ‘159 Patent, titled “Method for Providing Mobile Service
4 Using Code-pattern,” is attached hereto as Exhibit A.

5 12. The ‘159 Patent is valid, enforceable, and was duly issued in full
6 compliance with Title 35 of the United States Code.

7 13. Upon information and belief, at least through internal testing, Defendant
8 has infringed and continues to infringe one or more claims, including at least Claim
9 1 of the ‘159 Patent by using and/or incorporating code patterns in connection with
10 promotional media distributed by and/or controlled by Defendant in a manner covered
11 by one or more claims of the ‘159 Patent. Defendant has infringed and continues to
12 infringe the ‘159 Patent in violation of 35 U.S.C. § 271.

13 14. Regarding Claim 1, at least through internal use and testing, Defendant
14 provides content (e.g., a website with promotional information) with the use of a code
15 pattern (e.g., a QR code) in connection with promotional media containing the code
16 pattern. The content is provided by a user terminal (e.g., a smartphone or other device
17 capable of scanning the code pattern). Certain aspects of this element are illustrated
18 in the screenshots below.

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Source: <https://www.zuca.com/found>

15. A photographic image of the code pattern (e.g., image of QR code) is obtained using a camera of the user terminal (e.g., the camera of the smartphone). These elements are illustrated in the screenshots below and/or in screenshots provided in connection with other allegations herein.



24
25 **Source:** Screenshot taken from Smartphone

1 16. A processor of the user terminal processes the photographic image of the
2 code pattern to extract the code pattern (e.g., image of QR code) from the
3 photographic image. The extracted code pattern can be viewed by the user. Certain
4 aspects of this element are illustrated in the screenshots below and/or screenshots
5 referenced in other paragraphs herein.



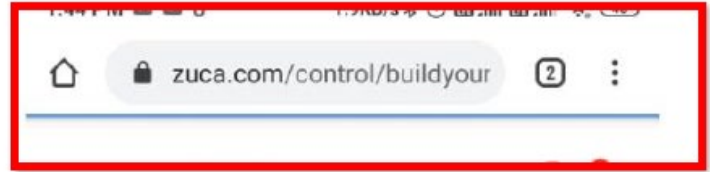
19
20 **Source: Screenshot taken from Smartphone**

21 17. The extracted code pattern is decoded by the processor of the user
22 terminal (e.g., smartphone processor) into code information (e.g., the URL of the web
23 page associated with Defendant). For example, the Smartphone decodes the QR code
24 on the object image captured from the smartphone's camera to obtain a decoded
25 hyperlink. Certain aspects of this element are illustrated in the screenshots below
26 and/or screenshots referenced in other paragraphs herein.
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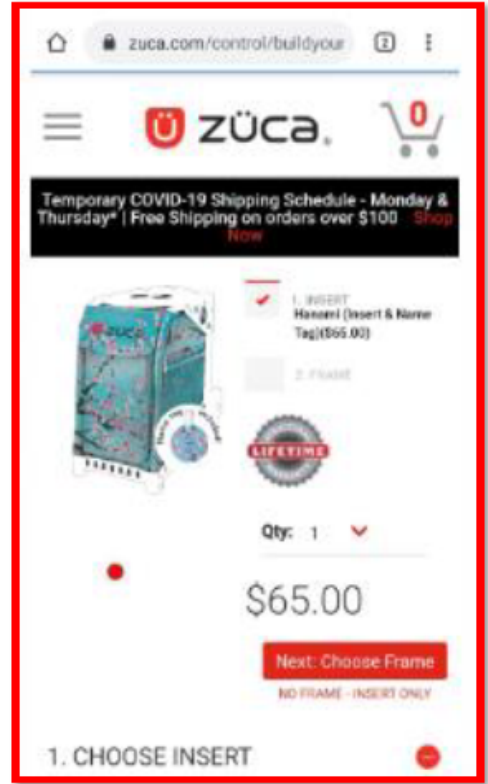
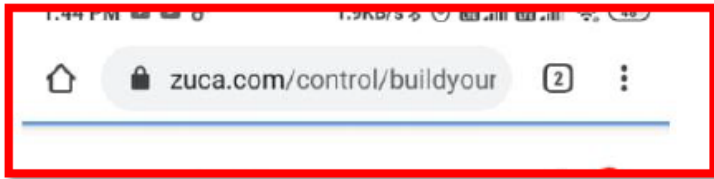
Source: Screenshot taken from Smartphone

18. A content information request message is sent to a server based on the code information. For example, a content information request message (e.g., http request message for accessing the webpage associated with Defendant) is transmitted to a server (e.g., Defendant's server) based on the code information (e.g., URL of the webpage associated with Defendant). Once the URL is decoded from the extracted QR code, a request for accessing a webpage associated with Defendant is sent to Defendant's server. For example, the smartphone sends the information associated with the QR code to Defendant's server. Certain aspects of this element are illustrated in the screenshots below and/or those referenced in other paragraphs herein.



12 **Source:** Screenshot taken from Smartphone

14 19. Defendant practices receiving content information (e.g., a web page
15 associated with Defendant) from the server (e.g., Defendant's server) in response to
16 the content information request message. The terminal (e.g., smartphone) receives
17 Defendant's webpage. For example, after clicking on the hyperlink that is obtained
18 by scanning the QR code associated with the product, the smartphone receives the
19 information about the product from Defendant's server. Certain aspects of this
20 element are illustrated in the screenshots below and/or those referenced in other
21 paragraphs herein.



Source: Screenshot taken from Smartphone

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

21. 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.

22. 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.

1 8,540,159 (or, in the alternative, awarding Plaintiff running royalties from the time of
2 judgment going forward);

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

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

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

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9 **DEMAND FOR JURY TRIAL**

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11 Pursuant to Fed. R. Civ. P. 38(b) and Civil L.R. 3-6, Plaintiff hereby requests
12 a trial by jury on any issues so triable by right.

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15 Dated: April 24, 2020

Respectfully submitted,

16 /s/ Stephen M. Lobbin

17 Stephen M. Lobbin

18 sml@smlavvocati.com

19 SML AVVOCATI P.C.

888 Prospect Street, Suite 200

San Diego, California 92037

(949) 636-1391 (Phone)

21 ***Attorney(s) for Plaintiff Coding***
22 ***Technologies, LLC***