IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

SCANNING TECHNOLOGIES INNOVATIONS LLC,	§ § §	
Plaintiff,	§ §	Case No: 1:20-cv-00509
vs.	§ § §	PATENT CASE
VEEQO, INC.	§ § §	
Defendant.	§ § §	

ORIGINAL COMPLAINT

Pursuant to F.R.C.P. 15(a)(1)(B), Plaintiff Scanning Technologies Innovations, LLC ("Plaintiff" or "STI") files this Original Complaint against Veeqo, Inc. ("Defendant" or "Veeqo") for infringement of United States Patent No. 10,600,101 (hereinafter "the '101 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 having an address of 1801 NE 123 St., Suite 314, Miami, FL 33181.

4.   On information and belief, Defendant is a Delaware corporation having a place of business at 600 Congress Avenue, Austin, TX 78701. On information and belief, Defendant

may be served through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

5.   On information and belief, 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.   On 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.   Venue is proper in this District 28 U.S.C. §1400(b) because Defendant is deemed to reside in this district. Alternatively, acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 10,600,101)

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 '101 Patent with sole rights to enforce the '101 Patent and sue infringers.
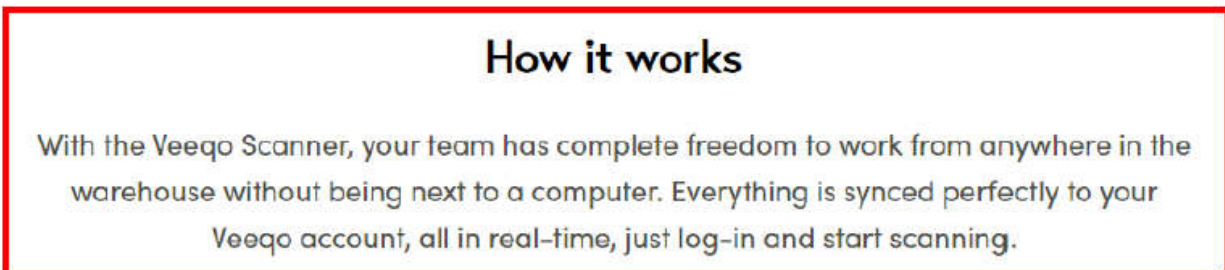
11.   A copy of the '101 Patent, titled "Systems and Methods for Indicating the Existence of Accessible Information Pertaining to Articles of Commerce," is attached hereto as Exhibit A.

12.   The '101 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '101 Patent by making, using, importing, selling, and/or offering for sale a point of sale system and app covered by one or more claims of the '101 Patent. Defendant has infringed and continues to infringe the '101 Patent directly in violation of 35 U.S.C. § 271.

14.   Defendant sells, offers to sell, and/or uses an online ordering system including, without limitation, the Veeqo POS point-of-sale system, app, and any similar products (collectively, "Product"), which infringe at least Claim 1 of the '101 Patent.

15.   The Product practices a system (e.g., Veeqo POS) for indicating an existence of a link (e.g., indication of existence of a link for an item) to information pertaining to an article of commerce (e.g., products sold through POS). This includes information relating to items existing in inventory. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

How it works

With the Veeqo Scanner, your team has complete freedom to work from anywhere in the warehouse without being next to a computer. Everything is synced perfectly to your Veeqo account, all in real-time, just log-in and start scanning.

Source: https://www.veeqo.com/features/veeqo-scanner#vs-functionality
Source: https://www.veeqo.com/features/veeqo-scanner#vs-specification

16.   The Product comprises a mobile device comprising a portable handheld housing (e.g., a mobile device integrated with a barcode scanner) and a communication interface (e.g., android operating system) configured to enable the mobile device to communicate with a communication network (configured to enable the mobile device to communicate with the Internet via a WI-FI or a 3G SIM Card). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Key features	Operating System	Android 4.4.2
	CPU	4 in. WVGA (480 × 800) TFT-LCD, capacitive dual touch
	Display	MTK Cortex-A7 Quad CORE
	Panel	Capacitive screen

Source: https://www.veeqo.com/features/veeqo-scanner#vs-specification
Source: https://help.veeqo.com/en/articles/3803912-technical-specifications-veeqo-scanner

17.   The Product uses a signal processing device (e.g., mobile device comprises a processor module for signal processing) and a visual input device, the visual input device affixed within the portable handheld housing (a barcode scanner is affixed within the portable handheld housing of Veeqo mobile device).   Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Integrated Barcode Scanner

With the Veeqo Scanner, your team has the complete freedom to work from anywhere in the warehouse without being next to a computer. Everything is synced perfectly to your Veeqo account, all in real-time, just log-in and start scanning.

Key features	Operating System	Android 4.4.2
	CPU	4 in. WVGA (480 × 800) TFT-LCD, capacitive dual touch
	Display	MTK Cortex-A7 Quad CORE
	Panel	Capacitive screen

Source: https://www.veeqo.com/features/pick-and-pack#barcode-scanner-picking
Source: https://help.veeqo.com/en/articles/3803912-technical-specifications-veeqo-scanner

18.   The Product comprises digital files (e.g., customized digital images, logos, etc.) supported by Veeqo POS and associated with the mobile device. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://www.veeqo.com/features/veeqo-scanner
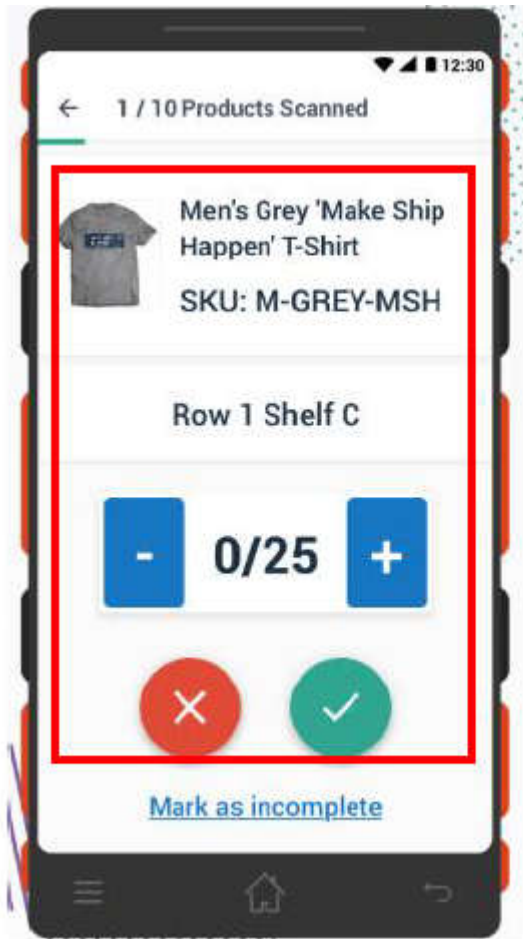
19.   The Product also includes a server in communication with the communication network, the server comprising a server database configured to store a look-up table that includes at least a plurality of bar codes associated with a plurality of articles of commerce (e.g., Veeqo mobile device communicates with Internet and stores plurality of barcodes associated with respective items). The look-up table also stores a plurality of information link indicators, each information link indicator associated with a respective bar code and article of commerce (e.g., table stores information related to respective items including item name, in stock, SKU Number, etc.). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Instant Syncing

Once scanned and booked in, the Veeqo Scanner will tell you where to put it in the warehouse.

Complete Freedom

Stay connected via your wifi network or with a 3G sim card.

Source: https://www.veeqo.com/features/veeqo-scanner
Source: https://youtu.be/Fb8C_i4o1yo

20.   Each information link indicator is configured as a status signal indicating the existence or absence of a link to information pertaining to a respective article of commerce, (e.g., item which includes the information related to name of item, stock in, SKU Number, etc.) the link being made to the information via the communication network (e.g., Veeqo mobile device communicates with the Internet via WI-FI OR 3G Sim Card). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Instant Syncing

Once scanned and booked in, the Veeqo Scanner will tell you where to put it in the warehouse.

Complete Freedom

Stay connected via your wifi network or with a 3G sim card.

Source: https://www.veeqo.com/features/veeqo-scanner
Source: https://youtu.be/Fb8C_i4o1yo`
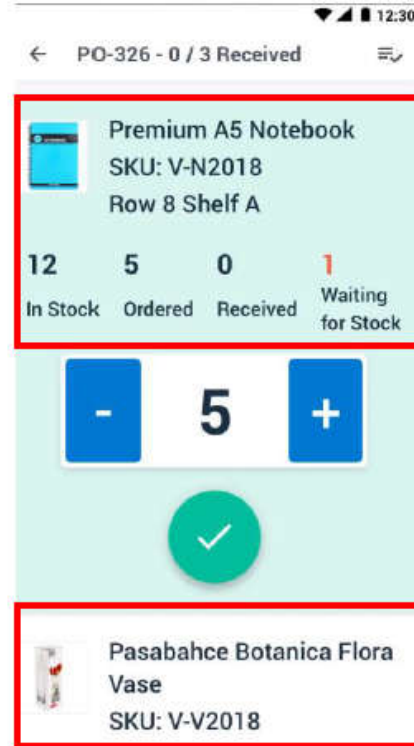
21.   The visual input device is configured to scan an image of an article of commerce (e.g., a barcode scanner is configure to scan the barcode), decode the image to obtain a bar code and forward data from the scanned image to the signal processing device (e.g., Veeqo mobile device's integrated barcode scanner decodes the barcode associated with an item and related data will be displayed on mobile device's screen). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

It works like this:

1. **Assign stock taking tasks** to team members in the Veeqo software.
2. Team members use the VS1 to **scan the item(s)** they're counting.
3. Verify quantities or **update discrepancies right there** on the VS1 screen.
4. Updates get reflected across **all sales channels instantly**.
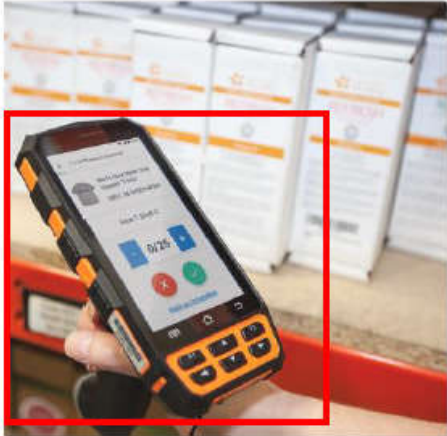
Book in stock from anywhere in the warehouse

As soon as new stock arrives in from your suppliers, use the Veeqo Scanner to book everything in there and then.

Instant Syncing

Once scanned and booked in, the Veeqo Scanner will tell you where to put it in the warehouse.

Complete Freedom

Stay connected via your wifi network or with a 3G sim card.

Source: https://www.veeqo.com/blog/introducing-vs1-scanner-veeqo
Source: https://www.veeqo.com/features/veeqo-scanner#vs-specification

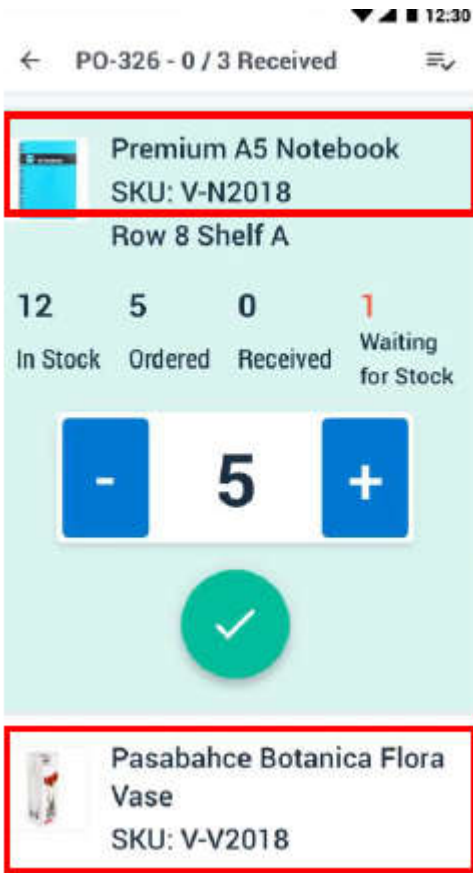   22.   In response to receiving the bar code, the signal processing device is configured to look up the bar code in the look-up table (e.g., after scanning a barcode associated with an item, mobile device lookup the SKU Number related to the item in plurality of items table.). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

It works like this:

1. **Assign stock taking tasks** to team members in the Veeqo software.
2. Team members use the VS1 to **scan the item(s)** they're counting.
3. Verify quantities or **update discrepancies right there** on the VS1 screen.
4. Updates get reflected across **all sales channels instantly.**

Source: https://youtu.be/Fb8C_i4o1yo`
Source: https://www.veeqo.com/blog/introducing-vs1-scanner-veeqo

23.   The Product determines from a respective information link indicator whether or not a link exists for accessing information pertaining to an article of commerce associated with the bar code (e.g., barcode associated item determines the availability of item with information including SKU number, category, quantity, name of item, etc.) via the communication network (e.g., a connection with the Internet). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.
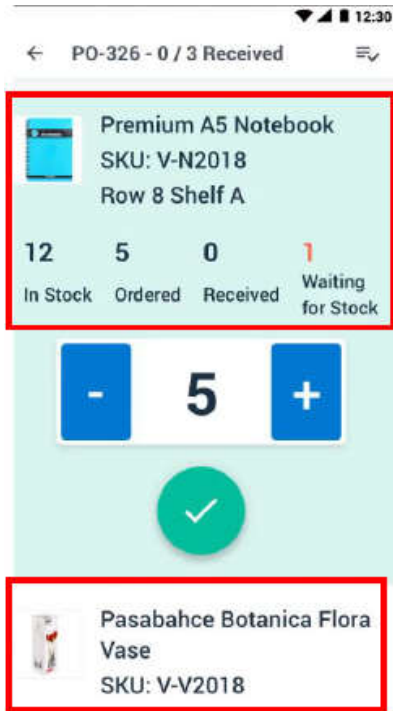
Source: https://www.veeqo.com/features/veeqo-scanner
Source: https://youtu.be/Fb8C_i4o1yo'

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

25.   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.

26.   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. 10,600,101 (or, in the alternative, awarding Plaintiff a running royalty 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: May 12, 2020   Respectfully submitted,

                                       /s/ Jay Johnson
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