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7 *Attorney(s) for Plaintiff Scanning Technologies Innovations, LLC*

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10 SCANNING TECHNOLOGIES  
11 INNOVATIONS, LLC,

12 *Plaintiff,*

13 v.

14 ALVARADO MFG. CO., INC.,

15 *Defendant.*

CASE NO.: 5:20-cv-02113

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

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17 Plaintiff Scanning Technologies Innovations, LLC (“Plaintiff” or “STI”) files  
18 this Original Complaint against Alvarado Mfg. Co., Inc. (“Defendant” or “Alvarado”)  
19 for infringement of United States Patent No. 10,600,101 (hereinafter “the ‘101  
20 Patent”) and alleges as follows:  
21  
22

23 **PARTIES AND JURISDICTION**

24 1. This is an action for patent infringement under Title 35 of the United  
25 States Code. Plaintiff is seeking injunctive relief as well as damages.  
26

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

1 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent  
2 infringement arising under the United States patent statutes.

3 3. Plaintiff is a Texas limited liability company having an address of 1801  
4 NE 123 St., Suite 314, Miami, FL 33181.  
5

6 4. On information and belief, Defendant is a California corporation having  
7 a place of business at 12660 Colony Street, Chino, California 91710. On information  
8 and belief, Defendant may be served through its registered agent, James Armatas, at  
9 the same address.  
10

11 5. On information and belief, this Court has personal jurisdiction over  
12 Defendant because Defendant has committed, and continues to commit, acts of  
13 infringement in this District, has conducted business in this District, and/or has  
14 engaged in continuous and systematic activities in this District.  
15  
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17 6. On information and belief, Defendant's instrumentalities that are alleged  
18 herein to infringe were and continue to be used, imported, offered for sale, and/or sold  
19 in this District.  
20

21 **VENUE**

22 7. Venue is proper in this District 28 U.S.C. §1400(b) because Defendant  
23 is deemed to reside in this district. Alternatively, acts of infringement are occurring  
24 in this District and Defendant has a regular and established place of business in this  
25 District.  
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**COUNT I**  
**(INFRINGEMENT OF UNITED STATES PATENT NO. 10,600,101)**

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2  
3 8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

4 9. This cause of action arises under the patent laws of the United States  
5 and, in particular, under 35 U.S.C. §§ 271, *et seq.*  
6

7 10. Plaintiff is the owner by assignment of the ‘101 Patent with sole rights  
8 to enforce the ‘101 Patent and sue infringers.

9 11. A copy of the ‘101 Patent, titled “Systems and Methods for Indicating  
10 the Existence of Accessible Information Pertaining to Articles of Commerce,” is  
11 attached hereto as Exhibit A.  
12

13 12. The ‘101 Patent is valid, enforceable, and was duly issued in full  
14 compliance with Title 35 of the United States Code.  
15

16 13. Upon information and belief, Defendant has infringed and continues to  
17 infringe one or more claims, including at least Claim 1, of the ‘101 Patent by making,  
18 using, importing, selling, and/or offering for sale a ticket validation system covered  
19 by one or more claims of the ‘101 Patent. Defendant has infringed and continues to  
20 infringe the ‘101 Patent directly in violation of 35 U.S.C. § 271.  
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22

23 14. Defendant sells, offers to sell, and/or uses a ticket validation system  
24 including, without limitation, the Alvarado ticket validation system, PocketGate  
25 mobile validation terminal, any associated hardware and software, and any similar  
26 products (collectively, “Product”), which infringe at least Claim 1 of the ‘101 Patent.  
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15. The Product practices a system (i.e., system for ticket validation) for indicating an existence of a link to information pertaining to an article of commerce (e.g., decoded by scanning a barcode, e.g., the existence of a link related to validation of tickets). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



### Mobile terminal for intelligent admission control

For over 20 years, venues worldwide have relied on Alvarado's intelligent admission solutions to provide automated entrance control at sports and entertainment venues. Working in concert with our industry standard GateLink10 software, the PocketGate-MVT is a portable mobile terminal that allows attendants to validate entry credentials and provide customer service functions. Providing excellent scanning performance and advanced wireless connectivity options, PocketGate-MVT provides excellent flexibility and versatility for all types of applications.



Source: <https://www.alvaradomfg.com/mobile-ticket-validation-pocketgate/>

Source: <https://www.alvaradomfg.com/mobile-ticket-validation-pocketgate/> (MVT datasheet pdf download)

16. The Product comprises a mobile device comprising a portable handheld housing (e.g., Gatelink 10 PocketGate mobile application running on a mobile devices) and a communication interface (e.g., cloud based communication interface) configured to enable the mobile device to communicate with a communication network (e.g., cloud network). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

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## Mobile terminal for intelligent admission control

For over 20 years, venues worldwide have relied on Alvarado's intelligent admission solutions to provide automated entrance control at sports and entertainment venues. Working in concert with our industry standard GateLink10 software, the PocketGate-MVT is a portable mobile terminal that allows attendants to validate entry credentials and provide customer service functions. Providing excellent scanning performance and advanced wireless connectivity options, PocketGate-MVT provides excellent flexibility and versatility for all types of applications.



Cloud Compatible

Communicates with server via Wi-Fi or using 3G  
cellular data.

Source: <https://www.alvaradomfg.com/mobile-ticket-validation-terminal-pocketgate-svt/>

Source: <https://www.alvaradomfg.com/mobile-ticket-validation-pocketgate/>

17. The Product uses a signal processing device and a visual input device, the visual input device affixed within the portable handheld housing. For example, a visual input device (e.g., camera for scanning barcode) and a signal processing device (e.g., processor of mobile device) are affixed within the portable handheld housing (e.g., the housing of mobile device). The mobile device equipped camera is used to scan a barcode code via the mobile application to obtain ticket details (e.g., ticket

1 validation and information about the ticket) related to a particular barcode. Certain  
2 aspects of this element are illustrated in the screenshots below and/or those provided  
3 in connection with other allegations herein.  
4



Benefits:

- Superior 1D/2D barcode scanning
- RFID/NFC validation (supports 13.56 Mhz & ISO 1443A/B)
- Excellent wireless connectivity (801.11a, b/n) and cellular support
- Very rugged 5' drop to concrete rating. Highly resistant to dust and water infiltration (IP65 rated)
- Bright touchscreen is very responsive and visible in bright sunlight
- 4000mAH battery provides a full day of operation on a single charge
- Powerful quad-core 1.2 GHz processor with 2GB RAM
- Bluetooth 4.0
- Other included hardware includes vibration promoting, audio, GPS support and dual cameras

Industrial grade Android platform mobile terminal

Our Smart Validation Terminal (SVT) provides 1D/2D barcode and RFID/NFC validation with an extremely long battery life and excellent wireless connectivity in an operator friendly form factor.

Source: <https://www.alvaradomfg.com/mobile-ticket-validation-pocketgate/>

19 18. The Product comprises digital files associated with the mobile device.  
20 For example, the mobile device contains audio, and also displays barcode and ticket  
21 details (digital files) as a result of scanning the barcode with the mobile device  
22 camera. Certain aspects of this element are illustrated in the screenshots below and/or  
23 those provided in connection with other allegations herein.  
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Benefits:

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- RRFID/NFC validation (supports 13.56 Mhz & ISO 1443A/B)
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Source: <https://www.alvaradomfg.com/mobile-ticket-validation-terminal-pocketgate-svt/>

Source: <https://www.alvaradomfg.com/mobile-ticket-validation-pocketgate/>

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. For example, the mobile application communicates with the server through a cloud communication network. The server has a database to store a look-up table (e.g., database stores ticket details and information related to a particular event). Also, the server database contains a plurality of bar code, each of which has associated ticket and event information (e.g., the ticket and/or event is the article of



1 commerce). Certain aspects of this element are illustrated in the screenshots below  
2 and/or those provided in connection with other allegations herein.

### 3 **Software Solutions**

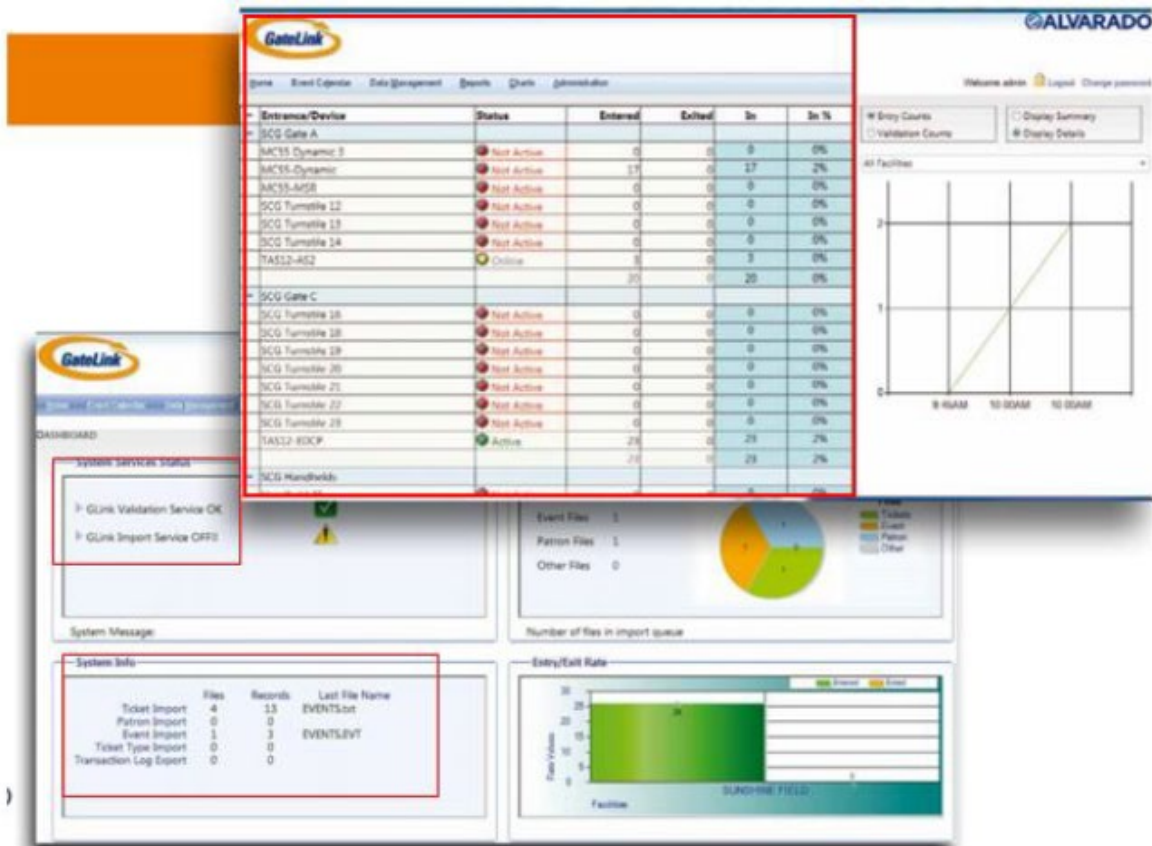
#### 4 **GateLink10™ Admission Software**

5 GateLink10 is admission software  
6 for reserved seat and general  
7 admission facilities. GateLink10  
8 seamlessly integrates with the  
9 ticketing provider and Alvarado  
10 intelligent admission devices to  
11 provide a world class admission  
12 system. GateLink10 integrates with  
13 Alvarado's VenueView360 product.



14 Cloud Compatible  
15 Communicates with server via Wi-Fi or using 3G  
16 cellular data.



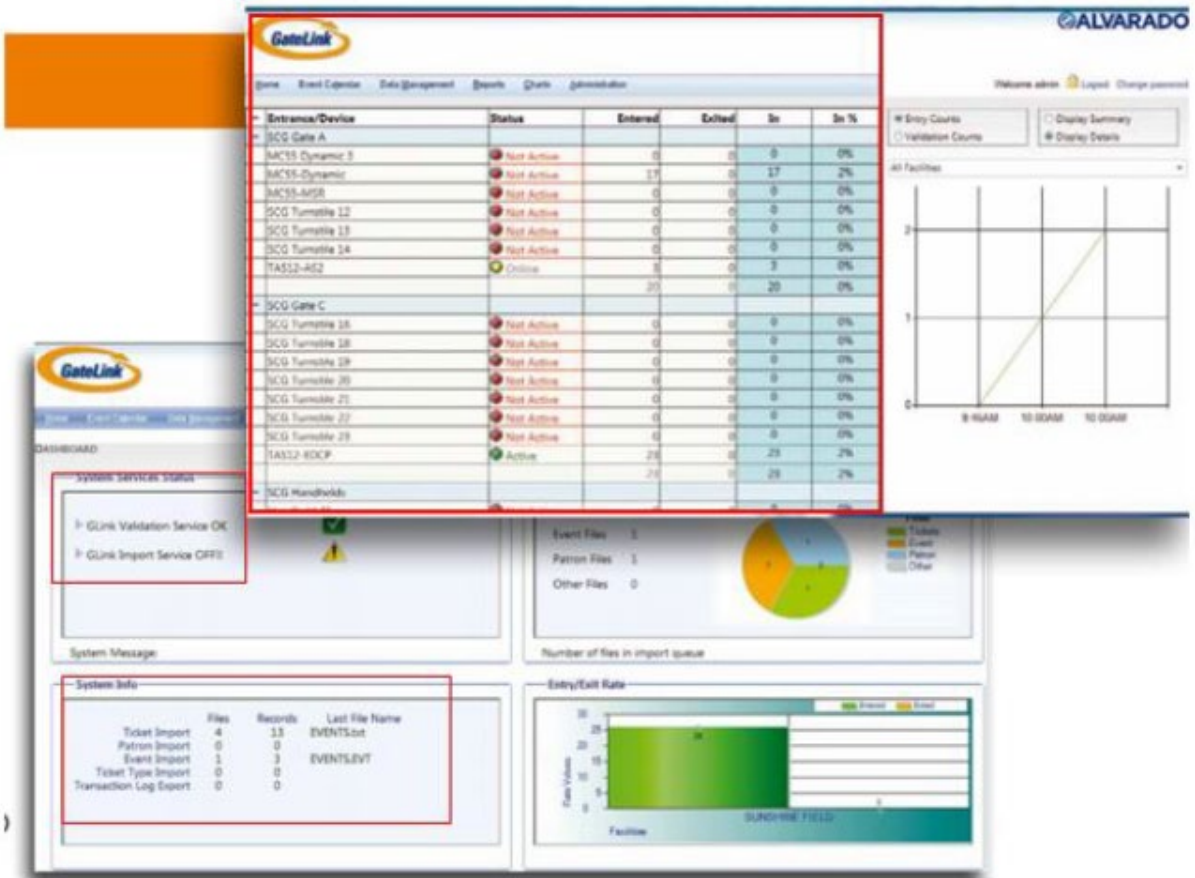


Screen images of GateLink10 showing Dashboard (bottom) and Home Screen (top).

Source: <https://www.alvaradomfg.com/mobile-ticket-validation-terminal-pocketgate-svt/>

Source: [http://alvaradomfg.com/wp-content/uploads/download-manager-files/SNE\\_CTLG\\_131104.pdf](http://alvaradomfg.com/wp-content/uploads/download-manager-files/SNE_CTLG_131104.pdf)

20. The look-up table also stores a plurality of information link indicators (e.g., link indicating validation of scanned barcode ticket and details associated with ticket) and displays information associated with respective barcodes. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



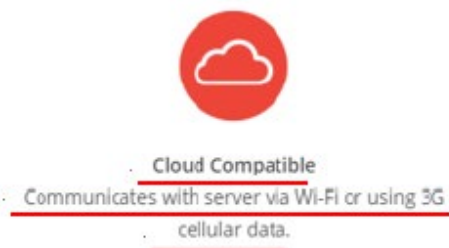
Screen images of GateLink10 showing Dashboard (bottom) and Home Screen (top).

# SMART VALIDATION TERMINAL



Source: [http://alvaradomfg.com/wp-content/uploads/download-manager-files/SNE\\_CTLG\\_131104.pdf](http://alvaradomfg.com/wp-content/uploads/download-manager-files/SNE_CTLG_131104.pdf)  
 Source: <https://www.alvaradomfg.com/mobile-ticket-validation-terminal-pocketgate-svt/>

1           21. Each information link indicator is configured as a status signal indicating  
2 the existence or absence of a link to information pertaining to a respective article of  
3 commerce, the link being made to the information via the communication network.  
4  
5 For example, each information link, which is obtained by scanning a barcode acts as  
6 a status signal (e.g., link indicating validation of scanned barcode ticket and details  
7 associated with ticket). The information about the link is retrieved through cloud  
8 communication network. Certain aspects of this element are illustrated in the  
9 screenshots below and/or those provided in connection with other allegations herein.  
10



27 Source: <https://www.alvaradomfg.com/mobile-ticket-validation-pocketgate/>

28 Source: <https://www.alvaradomfg.com/mobile-ticket-validation-terminal-pocketgate-svt/>

22. The visual input device is configured to scan an image of an article of commerce, decode the image to obtain a bar code and forward data from the scanned image to the signal processing device. For example, the visual input device (e.g., mobile device camera) is configured to scan the code image associated with article of commerce. After scanning the code image, the device decodes the image to obtain the code and retrieve information about the ticket. The information is forwarded to the signal processor. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Benefits:

- Superior 1D/2D barcode scanning
- RFD/NFC validation (supports 13.56 Mhz & ISO 14443A/B)
- Excellent wireless connectivity (801.11a, b/n) and cellular support
- Very rugged 5' drop to concrete rating. Highly resistant to dust and water infiltration (IP65 rated)
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23. In response to receiving the bar code, the signal processing device is configured to look up the bar code in the look-up table and determine from a link indicator whether or not a link exists for accessing information pertaining to an article of commerce associated with the bar code. This is done via the communication

1 network. For example, the signal processing device (e.g., processor of mobile device)  
 2 is configured to look up the bar code in the look-up table (e.g., database) to determine  
 3 from a respective information link (e.g., link indicating validation of scanned barcode  
 4 ticket). From the link indicator, the processor determines whether there is a link to  
 5 information pertaining to an article of commerce associated with the bar code (e.g.,  
 6 information about the ticket associated with the bar code) via the communication  
 7 network (e.g., cloud network). Certain aspects of this element are illustrated in the  
 8 screenshots below and/or those provided in connection with other allegations herein.  
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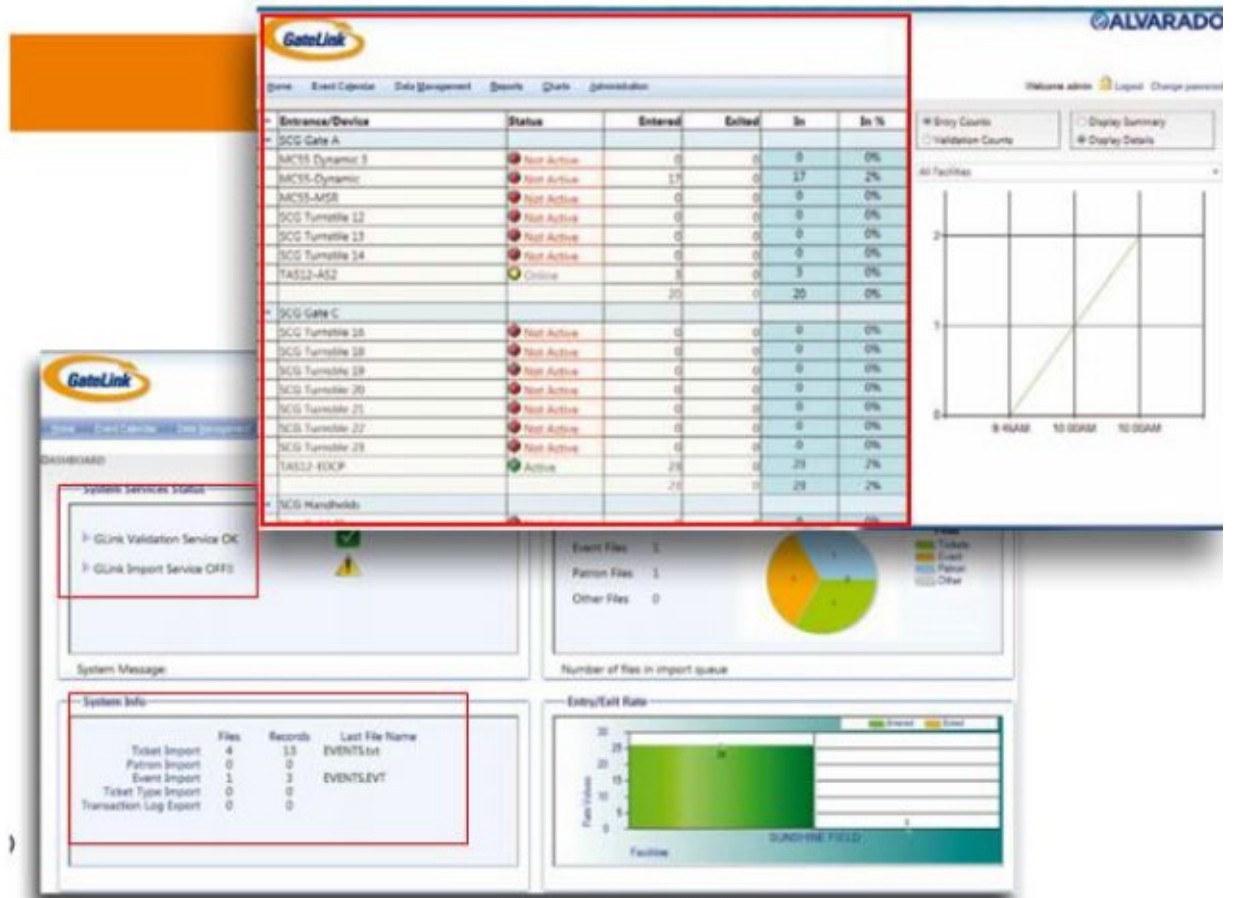
Benefits:

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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: October 8, 2020

Respectfully submitted,

/s/ Stephen M. Lobbin

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Technologies Innovations, LLC***