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

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

10 SCANNING TECHNOLOGIES
11 INNOVATIONS, LLC,

12 *Plaintiff,*

13 v.

14 WEBCONNEX, LLC,

15 *Defendant.*

CASE NO.:

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

17 Plaintiff Scanning Technologies Innovations, LLC (“Plaintiff” or “STI”) files
18 this Original Complaint against Webconnex, LLC (“Defendant” or “Webconnex”) for
19 infringement of United States Patent No. 10,600,101 (hereinafter “the ‘101 Patent”)
20 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.
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COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 10,600,101)

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

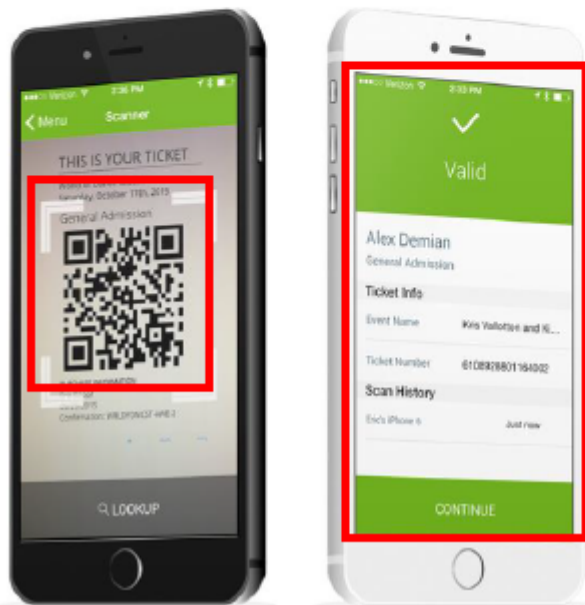
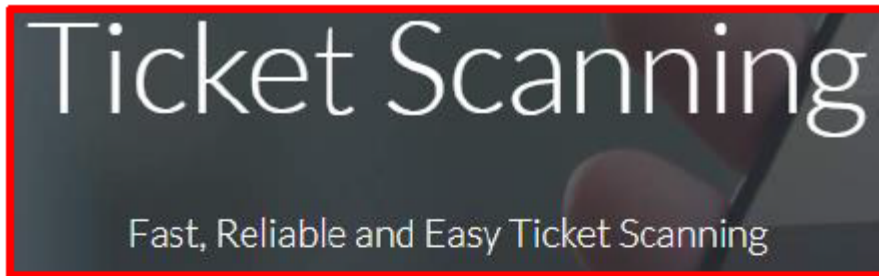
9
10 11. A copy of the ‘101 Patent, titled “Systems and Methods for Indicating
11 the Existence of Accessible Information Pertaining to Articles of Commerce,” is
12 attached hereto as Exhibit A.

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

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

23 14. Defendant sells, offers to sell, and/or uses a ticket validation system
24 including, without limitation, the Webconnex and/or TicketSpice ticket validation
25 system, any associated hardware and software, and any similar products (collectively,
26 “Product”), which infringe at least Claim 1 of the ‘101 Patent.
27
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1 15. The Product practices a system (e.g., TicketSpice ticket scanning) for
2 indicating an existence of a link decoded from a QR code, related to information of
3 an article of commerce (e.g., to display information related to a ticket associated with
4 the QR code). Certain aspects of this element are illustrated in the screenshots below
5 and/or those provided in connection with other allegations herein.
6



Hard Stock Tickets (BETA)



Written by Hannah
Updated over a week ago

The Hard Stock Tickets feature allows you to upload or generate codes that can be scanned by the [TicketSpice App](#). This is most commonly used in partnership with a ticket printer so that physical tickets are available for sale onsite.

This feature is currently in BETA testing, you can apply to join the test group [here](#).

Source: <https://www.ticketspice.com/ticket-scanning-app/>

Source: <https://help.ticketspice.com/en/articles/3561343-hard-stock-tickets-beta>

16. The Product comprises a mobile device comprising a portable handheld housing and a communication interface configured to enable the mobile device to communicate with a communication network. For example, the Product incorporates a mobile device comprising a portable handheld housing (e.g., TicketSpice mobile application running on mobile device) and a communication interface (i.e. 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.

About TicketSpice

TicketSpice is cloud-based ticketing and event management solution. Key features include ticket options, fee controller, price setting, event analytics, inventory tracking, accepting offline payments and branding control.

TicketSpice offers features that include creating customizable ticketing pages by dragging and dropping fields. The product also offers mobile ticketing options that enable users to purchase tickets on mobile phones, get ticket barcodes on mobiles and scan tickets through the solution's iOS App.



Lightning Fast

Our scanning application works with traditional laser devices as well as camera enabled devices. Our application scans and validates the ticket in milliseconds and alerts you on screen as well with a validating beep. Scan in people in record time and ease.

Source: <https://www.softwareadvice.com/ticketing/ticketspice-profile/>

Source: <https://www.ticketspice.com/ticket-scanning-app/>

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 QR code) and signal processing device (i.e. 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 a scan QR code via the TicketSpice application to obtain ticket details (i.e., time, date and event name) related to a particular event. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

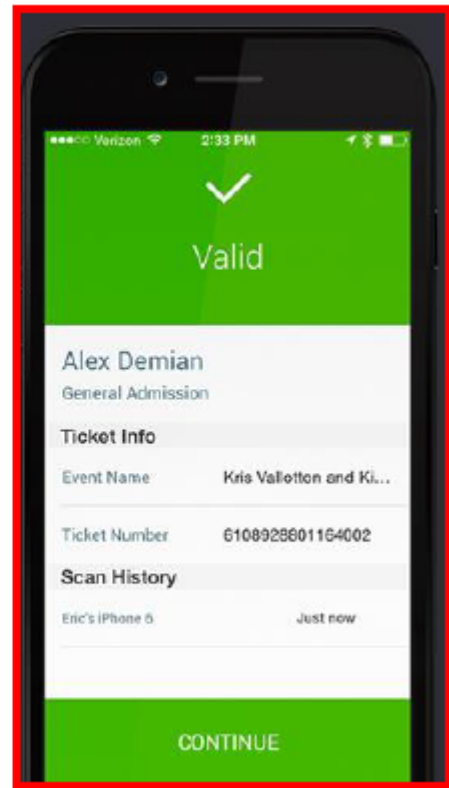


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Our scanning application works with traditional laser devices as well as camera enabled devices. Our application scans and validates the ticket in milliseconds and alerts you on screen as well with a validating beep. Scan in people in record time and ease.

Source: <https://www.ticketspice.com/ticket-scanning-app/>

18. The Product comprises digital files associated with the mobile device. For example, application has digital files (e.g., QR code image files and digital ticket and event details) 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.ticketspice.com/ticket-scanning-app/>

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 TicketSpice application communicates with the server through a cloud communication network. The server includes a database to store a look-up table (i.e. TicketSpice database which is associated with ticket details of particular event). The database contains a plurality of QR codes containing event and ticket information. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

1 About TicketSpice

2 TicketSpice is cloud-based ticketing and event management
3 solution. Key features include ticket options, fee controller, price
4 setting, event analytics, inventory tracking, accepting offline
5 payments and branding control.

6 TicketSpice offers features that include creating customizable
7 ticketing pages by dragging and dropping fields. The product
8 also offers mobile ticketing options that enable users to
9 purchase tickets on mobile phones, get ticket barcodes on
10 mobiles and scan tickets through the solution's iOS App.

11  **Real-time Analytics**
12 Get incredible realtime insights into
13 your event ticket sales natively from
14 one dashboard.



15 SCAN



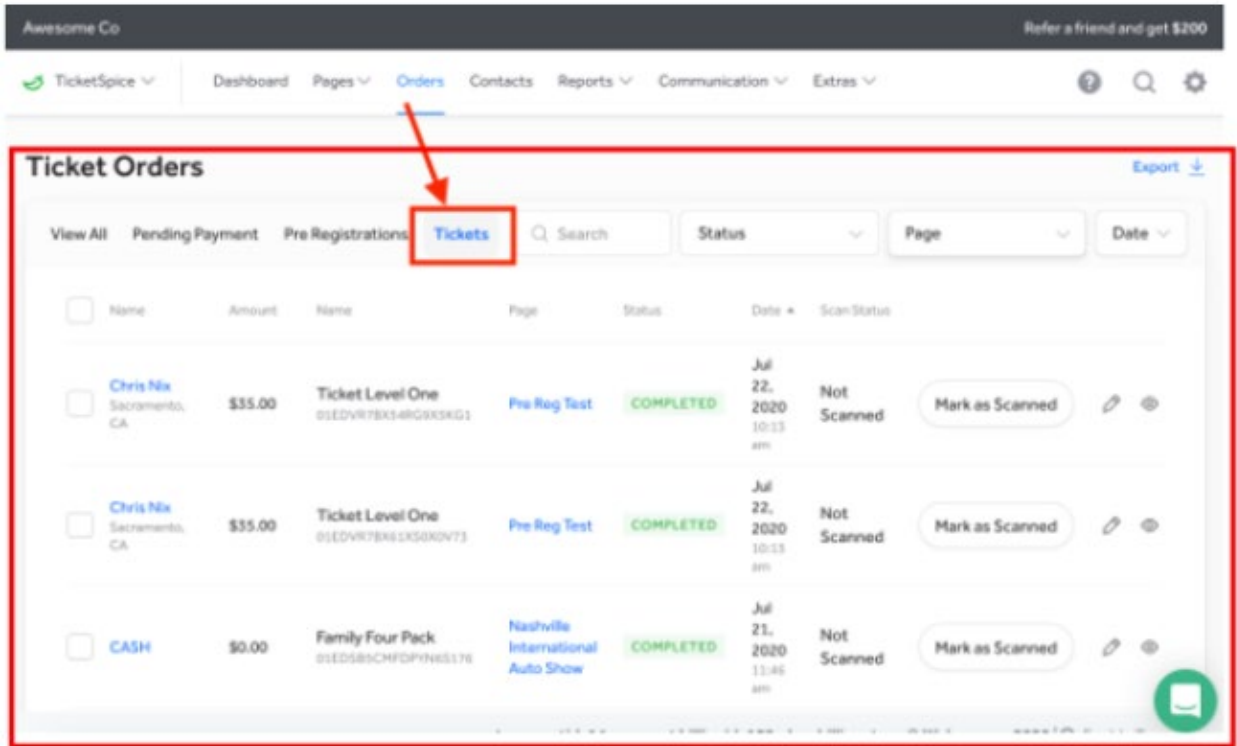
15 SEARCH



18 REPORTS



18 SETTINGS

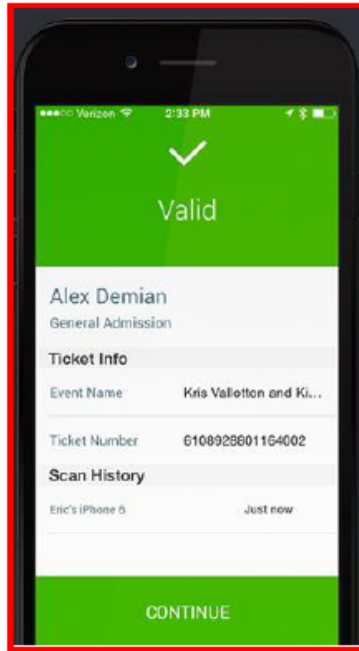


Source: <https://www.softwareadvice.com/ticketing/ticketspice-profile/>

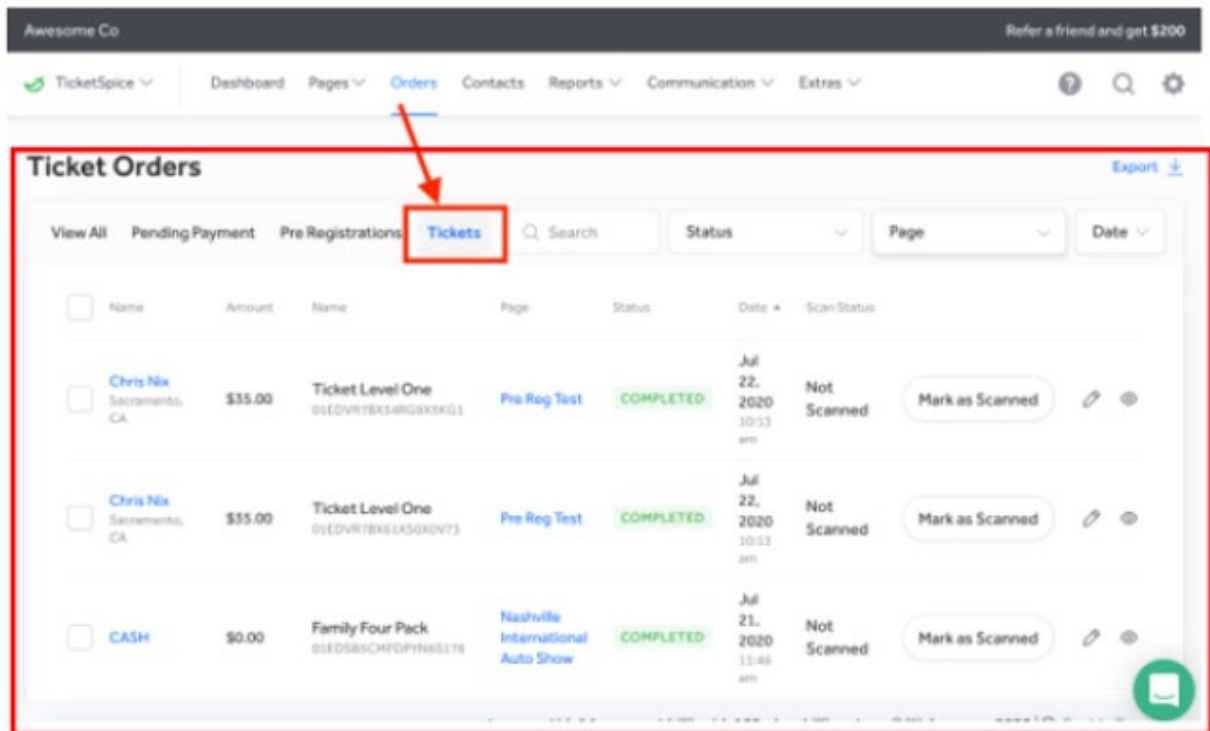
Source: <https://www.ticketspice.com/ticket-scanning-app/>

Source: <https://www.ticketspice.com/>

20. 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. For example, the look-up table (i.e. TicketSpice dashboard) also stores a plurality of information link indicators (e.g., link indicating availability and validity of scanned ticket online) indicating information associated with respective QR code. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Real-time Analytics
Get incredible realtime insights into your event ticket sales natively from one dashboard.

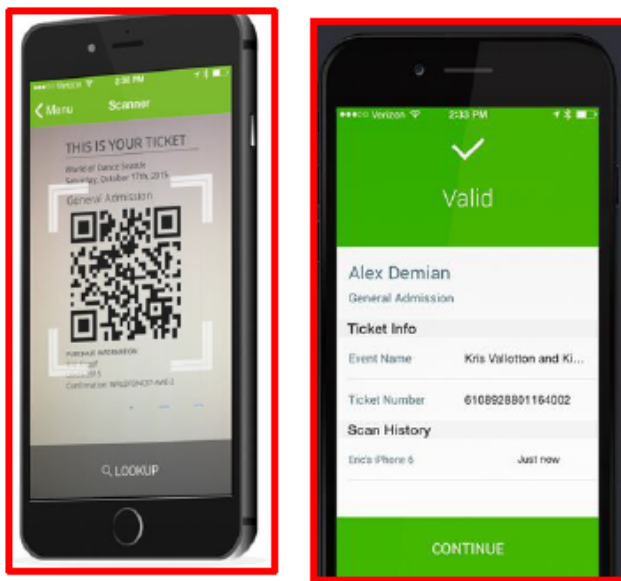


Source: <https://www.ticketspice.com/ticket-scanning-app/>

Source: <https://www.ticketspice.com/>

21. 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

1 commerce, the link being made to the information via the communication network.
2 For example, each information link which is obtained by scanning a code indicates
3 the status signal (e.g., link indicating validation of scanned code ticket and details
4 associated with ticket). The information about the link is retrieved through the cloud
5 communication network. Certain aspects of this element are illustrated in the
6 screenshots below and/or those provided in connection with other allegations herein.
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About TicketSpice

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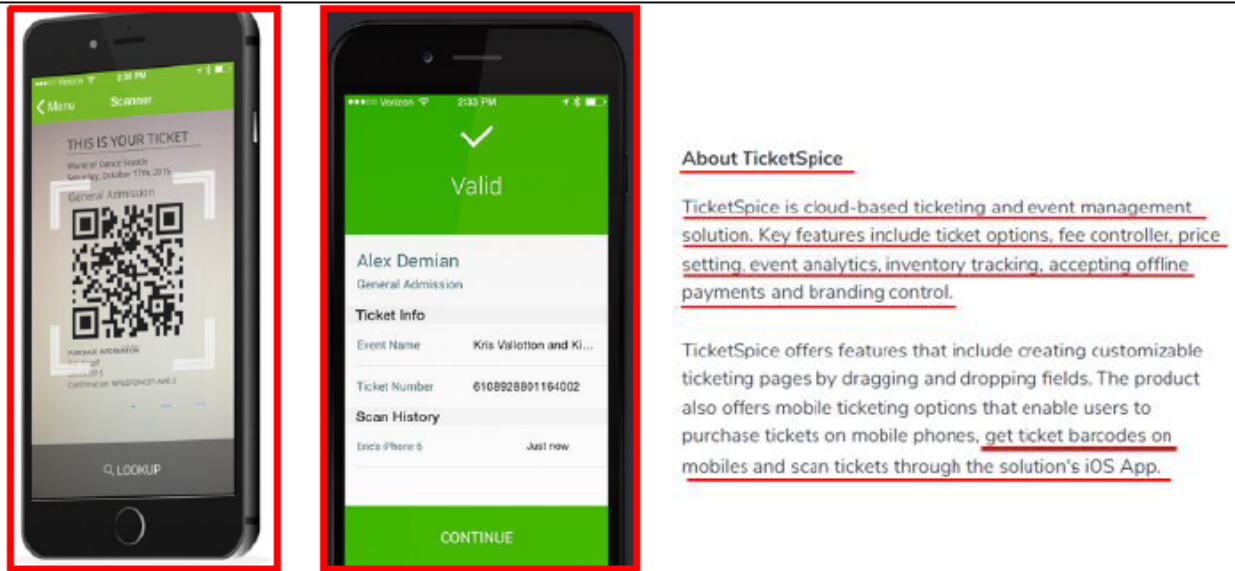
TicketSpice offers features that include creating customizable ticketing pages by dragging and dropping fields. The product also offers mobile ticketing options that enable users to purchase tickets on mobile phones, get ticket barcodes on mobiles and scan tickets through the solution's iOS App.

19 Source: <https://www.softwareadvice.com/ticketing/ticketspice-profile/>

20 Source: <https://www.ticketspice.com/ticket-scanning-app/>

21 22. The visual input device is configured to scan an image of an article of
22 commerce, decode the image to obtain a bar code and forward data from the scanned
23 image to the signal processing device. For example, the visual input device (i.e.
24 mobile device camera) is configured to scan an image of a QR code associated with
25 an article of commerce (i.e. electronic ticket and/or associated event). After scanning
26 the code, it is decoded to retrieve information about the ticket/event, which is
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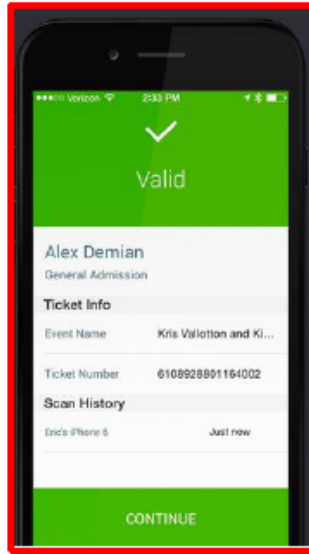
1 forwarded to the signal processing device (i.e. processor of mobile device). Certain
2 aspects of this element are illustrated in the screenshots below and/or those provided
3 in connection with other allegations herein.
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15 *Source:* <https://www.softwareadvice.com/ticketing/ticketspice-profile/>

16 *Source:* <https://www.ticketspice.com/ticket-scanning-app/>

17 23. In response to receiving the bar code, the signal processing device (i.e.
18 mobile device) is configured to look up the QR code in the look-up table (i.e.
19 TicketSpice database) to determine from a respective information link (e.g., link
20 indicating availability and validity of scanned barcode) whether or not information
21 pertaining to an article of commerce associated with the code may be accessed via the
22 communication network. Certain aspects of this element are illustrated in the
23 screenshots below and/or those provided in connection with other allegations herein.
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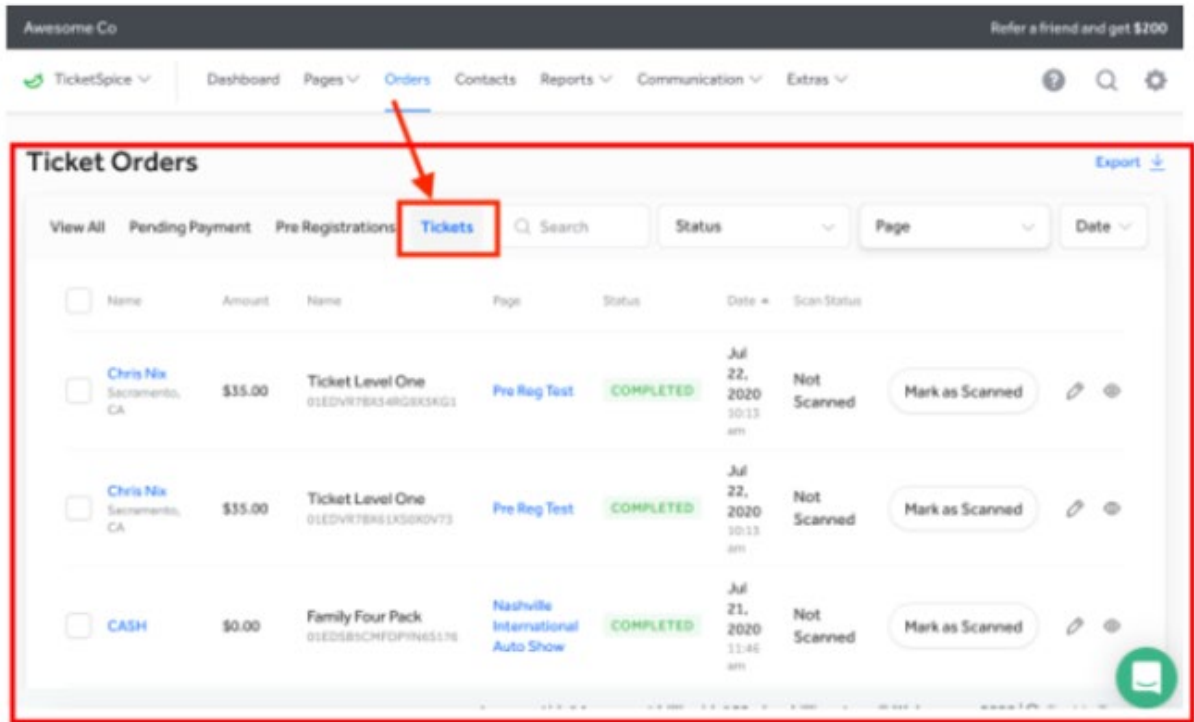


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Source: <https://www.ticketspice.com/ticket-scanning-app/>

Source: <https://www.ticketspice.com/>

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 12, 2020

Respectfully submitted,

/s/ Stephen M. Lobbin

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