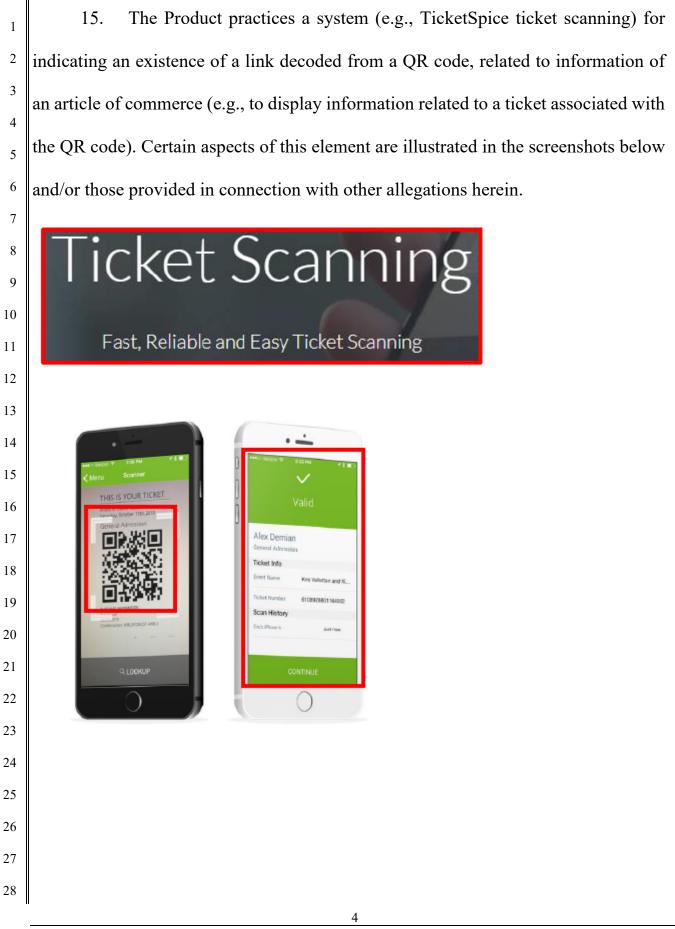
	Case 2:20-cv-02040-KJM-JDP Document 1	Filed 10/12/20 Page 1 of 16							
1	STEPHEN M. LOBBIN sml@smlavvocati.com								
2	SML AVVOCATI P.C.								
3	888 Prospect Street, Suite 200 San Diego, California 92037								
4	(949) 636-1391 (Phone)								
5 6	Attorney(s) for Plaintiff Scanning Technolo	gies Innovations, LLC							
7 8	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA								
9									
10	SCANNING TECHNOLOGIES INNOVATIONS, LLC,	CASE NO.:							
11	Plaintiff,	COMPLAINT FOR PATENT							
12	V.	INFRINGEMENT							
13		JURY TRIAL DEMANDED							
14	WEBCONNEX, LLC,	JUNI INIAL DEMANDED							
15	Defendant.								
16									
17 18	Plaintiff Scanning Technologies Innovations, LLC ("Plaintiff" or "STI") files								
19	this Original Complaint against Webconnex, LLC ("Defendant" or "Webconnex") for								
20	infringement of United States Patent No. 10,600,101 (hereinafter "the '101 Patent")								
21 22	and alleges as follows:								
23	PARTIES AND JURISDICTION								
24	1. This is an action for patent infringement under Title 35 of the United								
25	1								
26	States Code. Plaintiff is seeking injunctive	relief as well as damages.							
27									
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Case 2:20-cv-02040-KJM-JDP Document 1 Filed 10/12/20 Page 2 of 16

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 1 2 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent 3 infringement arising under the United States patent statutes. 4 3. Plaintiff is a Texas limited liability company having an address of 1801 5 NE 123 St., Suite 314, Miami, FL 33181. 6 7 On information and belief, Defendant is a Delaware corporation having 4. 8 a place of business at 1200 2nd Street - Second Flood, Sacramento, CA 95814. On 9 10 information and belief, Defendant may be served through its registered agent, Eric 11 Knopf, 455 Capitol Mall., Ste. 604, Sacramento Ca 95814. 12 5. On information and belief, this Court has personal jurisdiction over 13 14 Defendant because Defendant has committed, and continues to commit, acts of 15 infringement in this District, has conducted business in this District, and/or has 16 engaged in continuous and systematic activities in this District. 17 18 6. On information and belief, Defendant's instrumentalities that are alleged 19 herein to infringe were and continue to be used, imported, offered for sale, and/or sold 20 in this District. 21 22 VENUE 23 7. Venue is proper in this District 28 U.S.C. §1400(b) because Defendant 24 is deemed to reside in this District. Alternatively, acts of infringement are occurring 25 26 in this District and Defendant has a regular and established place of business in this 27 District. 28

	Case 2:20-cv-02040-KJM-JDP Document 1 Filed 10/12/20 Page 3 of 16								
1 2	<u>COUNT I</u> (INFRINGEMENT OF UNITED STATES PATENT NO. 10,600,101)								
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 6	and, in particular, under 35 U.S.C. §§ 271, et seq.								
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								
10	the Existence of Accessible Information Pertaining to Articles of Commerce," is								
12	attached hereto as Exhibit A.								
13	12. The '101 Patent is valid, enforceable, and was duly issued in full								
14 15	compliance with Title 35 of the United States Code.								
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									
19 20	using, importing, selling, and/or offering for sale a ticket validation system covered								
21	by one or more claims of the '101 Patent. Defendant has infringed and continues to								
22	infringe the '101 Patent directly in violation of 35 U.S.C. § 271.								
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 26	system, any associated hardware and software, and any similar products (collectively,								
27	"Product"), which infringe at least Claim 1 of the '101 Patent.								

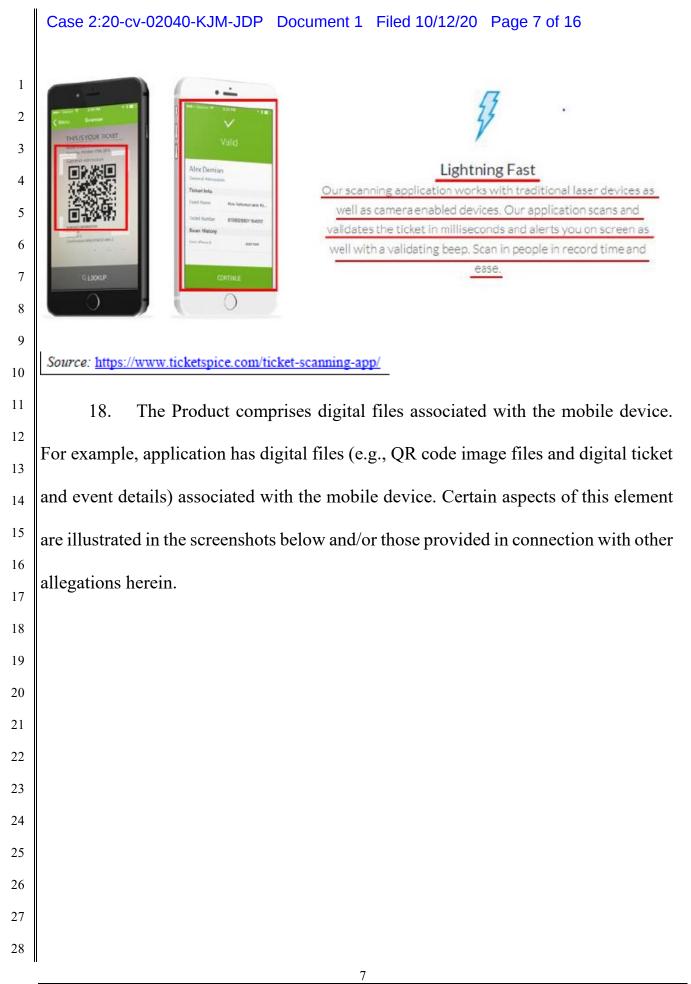


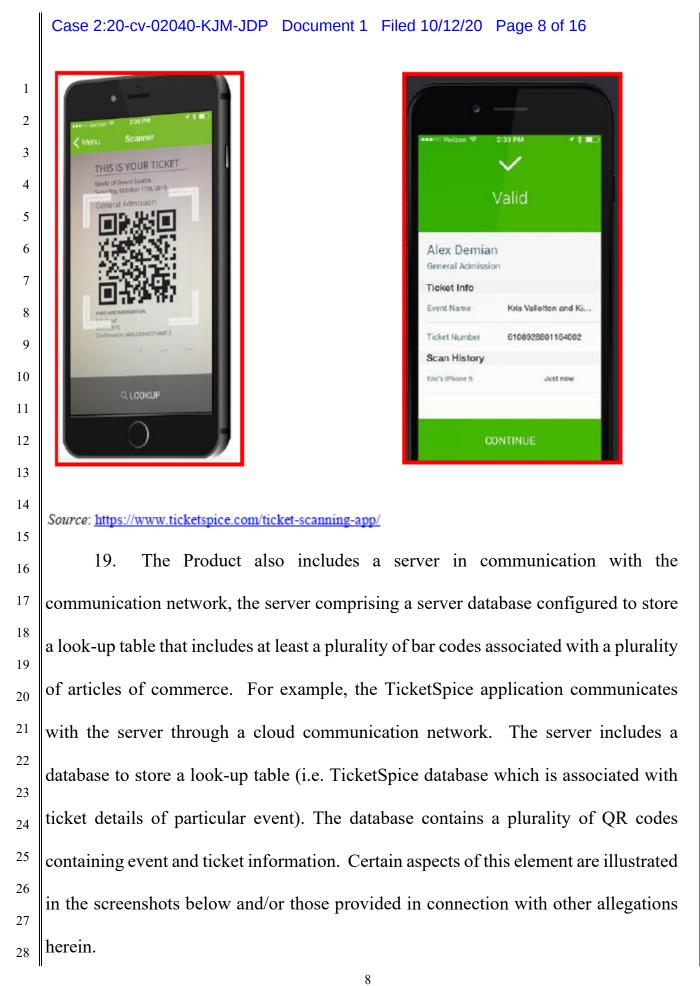
	Case 2:20-cv-02040-KJM-JDP Document 1 Filed 10/12/20 Page 5 of 16							
1	Hard Stock Tickets (BETA)							
2 3	Written by Hannah Updated over a week ago							
4	The Hard Stock Tickets feature allows you to upload or generate codes that can be							
5 6	scanned by the <u>TicketSpice App</u> . This is most commonly used in partnership with a ticket printer so that physical tickets are available for sale onsite.							
7	This feature is currently in BETA testing, you can apply to join the test group <u>here</u> .							
8								
9 10	Source: https://www.ticketspice.com/ticket-scanning-app/ Source:https://help.ticketspice.com/en/articles/3561343-hard-stock-tickets-beta							
11	16. The Product comprises a mobile device comprising a portable handheld							
12								
13	housing and a communication interface configured to enable the mobile device to							
14	communicate with a communication network. For example, the Product incorporates							
15	a mobile device comprising a portable handheld housing (e.g., TicketSpice mobile							
16 17	application running on mobile device) and a communication interface (i.e. cloud							
18	based communication interface) configured to enable the mobile device to							
19	communicate with a communication network (e.g., cloud network). Certain aspects							
20	of this element are illustrated in the screenshots below and/or those provided in							
21								
22	connection with other allegations herein.							
23 24								
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Case 2:20-cv-02040-KJM-JDP Document 1 Filed 10/12/20 Page 6 of 16 About TicketSpice 1 TicketSpice is cloud-based ticketing and event management 2 solution. Key features include ticket options, fee controller, price setting, event analytics, inventory tracking, accepting offline 3 payments and branding control. Max Derrine 4 TicketSpice offers features that include creating customizable ticketing pages by dragging and dropping fields. The product 5 also offers mobile ticketing options that enable users to purchase tickets on mobile phones, get ticket barcodes on 6 mobiles and scan tickets through the solution's iOS App. 7 8 9 10 Lightning Fast Our scanning application works with tr aditional laser devices as 11 well as camera enabled devices. Our application scans and validates the ticket in milliseconds and alerts you on screen as 12 well with a validating beep. Scan in people in record time and 13 ease 14 Source:https://www.softwareadvice.com/ticketing/ticketspice-profile/ 15 Source: https://www.ticketspice.com/ticket-scanning-app/ 16 17. The Product uses a signal processing device and a visual input device, 17 the visual input device affixed within the portable handheld housing. For example, a 18 19 visual input device (e.g., camera for scanning QR code) and signal processing device 20 (i.e. processor of mobile device) are affixed within the portable handheld housing 21 (e.g., the housing of mobile device). The mobile device equipped camera is used to a 22 scan QR code via the TicketSpice application to obtain ticket details (i.e., time, date 23 24 and event name) related to a particular event. Certain aspects of this element are

²⁵ ₂₆ illustrated in the screenshots below and/or those provided in connection with other

- ²⁷ allegations herein.
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About TicketSpice

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1 2 TicketSpice is cloud-based ticketing and event management solution. Key features include ticket options, fee controller, price 3 setting, event analytics, inventory tracking, accepting offline payments and branding control. 4 TicketSpice offers features that include creating customizable 5 ticketing pages by dragging and dropping fields. The product also offers mobile ticketing options that enable users to 6 purchase tickets on mobile phones, get ticket barcodes on 7 mobiles and scan tickets through the solution's iOS App. 8 **Real-time Analytics** 9 Get incredible realtime insights into 10 your event ticket sales natively from 11 one dashboard. 12 13 Q 14 15 SCAN SEARCH 16 17 18 REPORTS SETTINGS 19



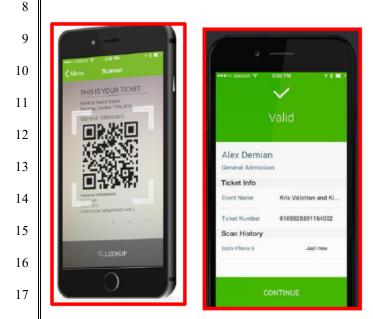
PLAINTIFF'S COMPLAINT AGAINST DEFENDANT WEBCONNEX, LLC

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Case 2:20-cv-02040-KJM-JDP Document 1 Filed 10/12/20 Page 11 of 16 1 ଚୁଡ଼ Real-time Analytics Get incredible realtime insights into 2 your event ticket sales natively from 33 PL one dashboard. THIS IS YOUR TICKET 3 Valid 4 5 Alex Demian General Admission 6 Ticket Info Event Name Kris Vallotton and Ki.. 7 Ticket Number 6108928801164002 Scan History 8 Eric's iPhone 6 Just now 9 10 11 12 Refer a friend and get \$200 ne Co 13 Contects 0 Q TicketSpice V Orders Reports V Com v notication Extras ~ 0 Pages V 14 Ticket Orders Export 4 15 Tickets Status Page Date v View All Pending Payment Pre Registratio C Search 16 Dote 4 Scan Statu 17 зú 22. Chris No 18 Ticket Level One Not \$35.00 COMPLETED Pre Rog Test Sain 2020 Mark as Scanned Scanned IN EDWIN PERCENTION 19 Jul. 22. Chris No Ticket Level One Not 20 \$35.00 Pre Reg Test COMPLETED 0 5.4 2020 Mark as Scanned Scanned 21 hel. 21. Family Four Pack Not CASH \$0.00 COMPLETED Mark as Scanned 2020 22 Scanned 23 24 Source: https://www.ticketspice.com/ticket-scanning-app/ 25 Source: https://www.ticketspice.com/ 26 Each information link indicator is configured as a status signal indicating 21. 27 28 the existence or absence of a link to information pertaining to a respective article of

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commerce, the link being made to the information via the communication network. For example, each information link which is obtained by scanning a code indicates the status signal (e.g., link indicating validation of scanned code ticket and details associated with ticket). The information about the link is retrieved through the cloud communication 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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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.

Source: https://www.softwareadvice.com/ticketing/ticketspice-profile/ Source: https://www.ticketspice.com/ticket-scanning-app/

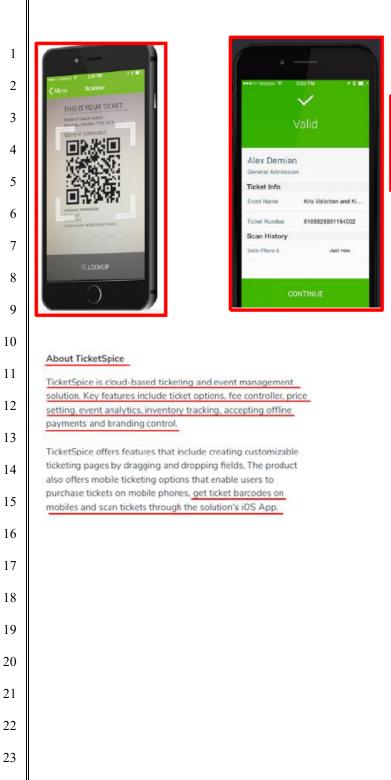
21 22. The visual input device is configured to scan an image of an article of
22 commerce, decode the image to obtain a bar code and forward data from the scanned
23 image to the signal processing device. For example, the visual input device (i.e.
25 mobile device camera) is configured to scan an image of a QR code associated with
26 an article of commerce (i.e. electronic ticket and/or associated event). After scanning
28 the code, it is decoded to retrieve information about the ticket/event, which is

Case 2:20-cv-02040-KJM-JDP Document 1 Filed 10/12/20 Page 13 of 16

forwarded to the signal processing device (i.e. processor of mobile device). 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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6	Marru Scanner ≠ 238 PM + 1 = 2 Marru Scanner + 2033 PM + 1 = =>
7	THIS IS YOUR TICKET Where the service of target leads where the service of target leads to be se
8	TicketSpice is cloud-based ticketing and event management solution. Key features include ticket options, fee controller, price
9	Alex Demian Beneral Admission Beneral Admission
10	Ticket Info Event Name Kris Validition and Ki TicketSpice offers features that include creating customizable
	Ticket Number 6108928801164002 ticketing pages by dragging and dropping fields. The product also offers mobile ticketing options that enable users to
11	Scan History Bisso on a scan tickets on mobile phones, get ticket barcodes on mobiles and scan tickets through the solution's iOS App.
12	
13	CONTINUE
14	
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	23. In response to receiving the bar code, the signal processing device (i.e.
	mobile device) is configured to look up the QR code in the look-up table (i.e.
19	TisketSpice detabase) to determine from a respective information link (a sub-
20	TicketSpice database) to determine from a respective information link (e.g., link
21	indicating availability and validity of scanned barcode) whether or not information
22	
23	pertaining to an article of commerce associated with the code may be accessed via the
24	communication network. Certain aspects of this element are illustrated in the
25	
26	screenshots below and/or those provided in connection with other allegations herein.
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Case 2:20-cv-02040-KJM-JDP Document 1 Filed 10/12/20 Page 14 of 16



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Real-time Analytics

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Get incredible realtime insights into your event ticket sales natively from one dashboard.

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		-		-			§ 287		

PRAYER FOR RELIEF

to:
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(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

¹⁸ entitled under law or equity.

Respectfully submitted, Dated: October 12, 2020 20 21 /s/ Stephen M. Lobbin Stephen M. Lobbin 22 sml@smlavvocati.com 23 SML AVVOCATI P.C. 888 Prospect Street, Suite 200 24 San Diego, California 92037 25 (949) 636-1391 (Phone) 26 Attorney(s) for Plaintiff Scanning 27 Technologies Innovations, LLC 28