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

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

9  
10 SCANNING TECHNOLOGIES  
INNOVATIONS, LLC,

11 *Plaintiff,*

12  
13 v.

14 UNIVERSE, INC., d/b/a UNIVERSE  
EXPERIENCES, INC.,

15 *Defendant.*  
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CASE NO.: 2:20-cv-09633

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

18 Pursuant to F.R.C.P. 15(a)(1)(B), Plaintiff Scanning Technologies Innovations,  
19 LLC (“Plaintiff” or “STI”) files this Original Complaint against Universe, Inc. d/b/a  
20 Universe Experiences, Inc. (“Defendant” or “Universe”) for infringement of United  
21 States Patent No. 10,600,101 (hereinafter “the ‘101 Patent”) and alleges as follows:  
22

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

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

6 4. On information and belief, Defendant is a Delaware corporation having  
7 a place of business at 9348 Civic Center Drive, Beverly Hills, CA 90210. On  
8 information and belief, Defendant may be served through its registered agent,  
9 Corporate Creations Network, Inc., 3411 Silverside Road, Tatnall Building, #104,  
10 Wilmington, DE 19810.

13 5. On information and belief, this Court has personal jurisdiction over  
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.

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.

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 in this District and Defendant has a regular and established place of business in this  
26 District.  
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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.

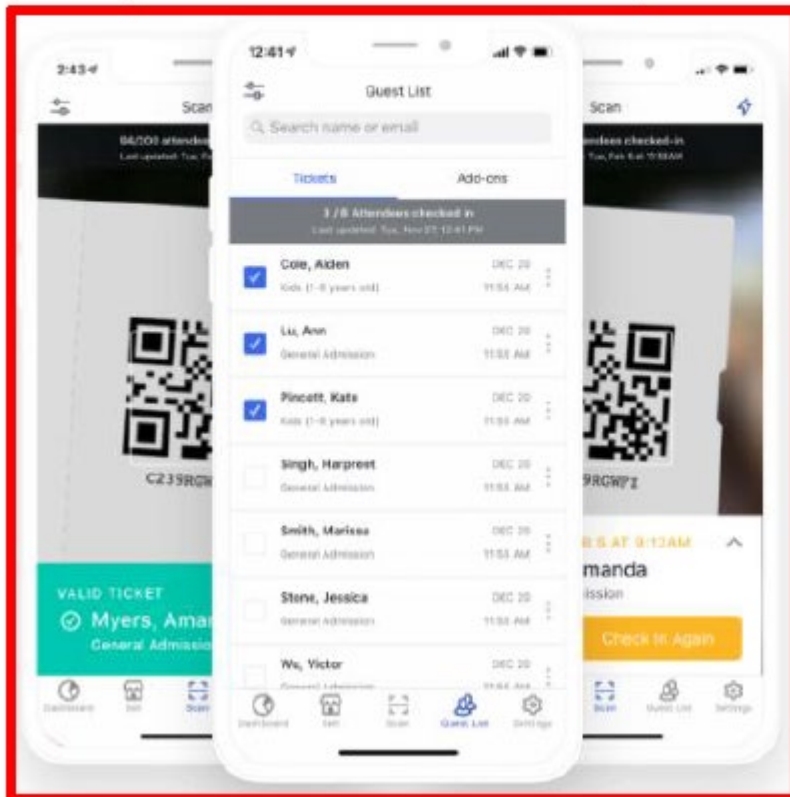
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10 11. A copy of the ‘101 Patent, titled “Systems and Methods for Indicating  
11 the Existence of Accessible Information Pertaining to Articles of Commerce,” is  
12 attached hereto as Exhibit A.

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.

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23 14. Defendant sells, offers to sell, and/or uses a ticket validation system  
24 including, without limitation, the Universe and/or BoxOffice ticket validation system,  
25 any associated hardware and software, and any similar products (collectively,  
26 “Product”), which infringe at least Claim 1 of the ‘101 Patent.  
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1           15. The Product provides an application (i.e., BoxOffice) for scanning a QR  
2 code which is present on a ticket to obtain a decoded link. The link is to information  
3 of an article of commerce (e.g., information related to a ticket). Certain aspects of this  
4 element are illustrated in the screenshots below and/or those provided in connection  
5 with other allegations herein.  
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## Scan with ease

Eliminate wait times and create a seamless experience for your attendees.

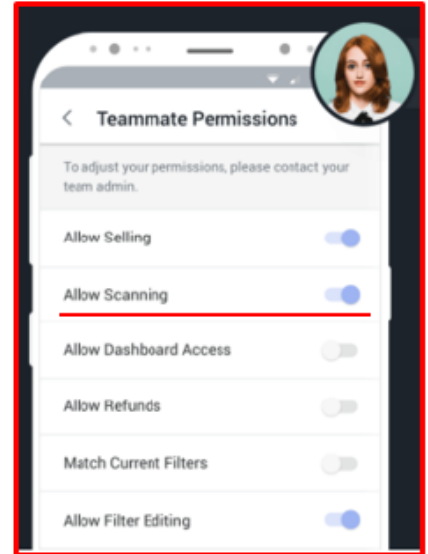
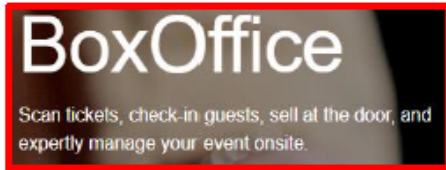
- ✓ Accommodate re-entries by allowing tickets to be scanned multiple times.
- ✓ Access your entire guest list at once or search for attendees by name or email.
- ✓ Customize your lines and check-in flow by setting devices to only scan a particular ticket type.

Source: <https://www.universe.com/boxoffice>

16. The Product includes 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 having a portable handheld housing (e.g., BoxOffice 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.

1 About Universe

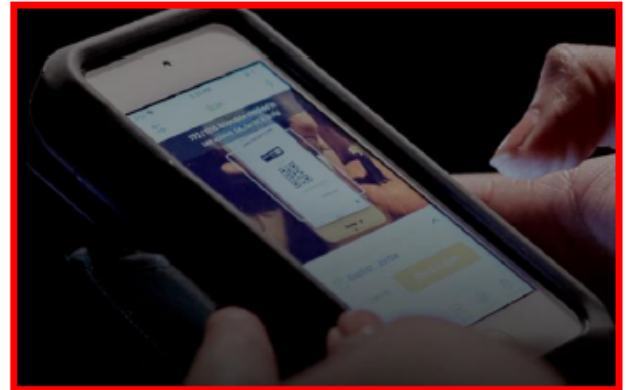
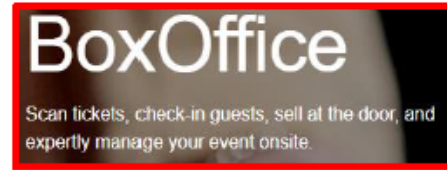
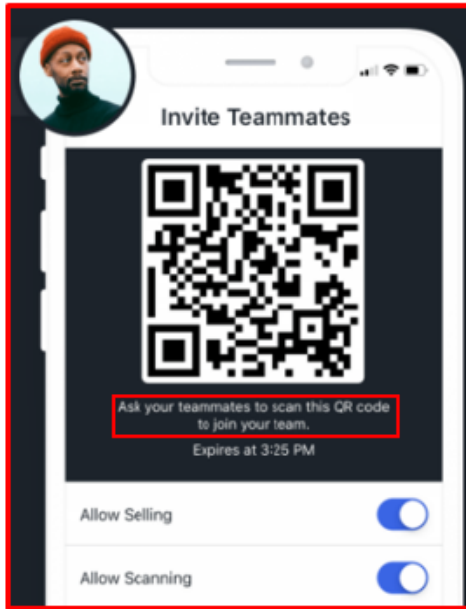
2 Universe is a cloud-based social ticketing solution that allows its  
3 customers to sell tickets online, promote brands and manage  
4 online events such as food festivals, film festivals, music  
5 festivals, tech conferences and fundraisers. Primary features  
6 include ticket manager, event page creation, electronic ticketing,  
7 access keys, social media campaigns, reporting and analytics.



11 Source : <https://www.universe.com/boxoffice>

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

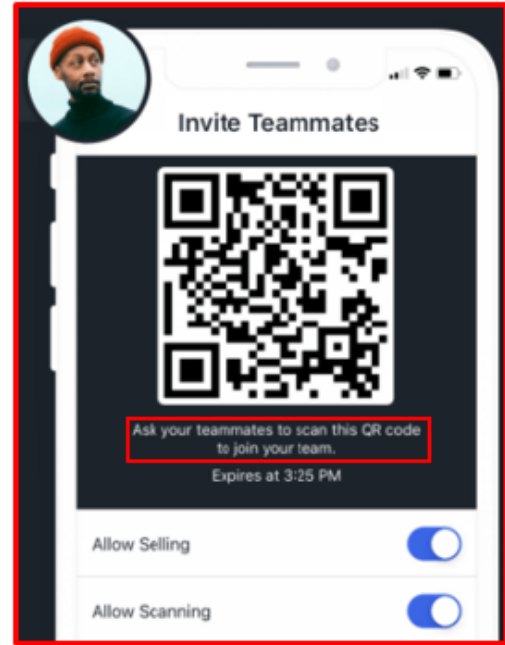
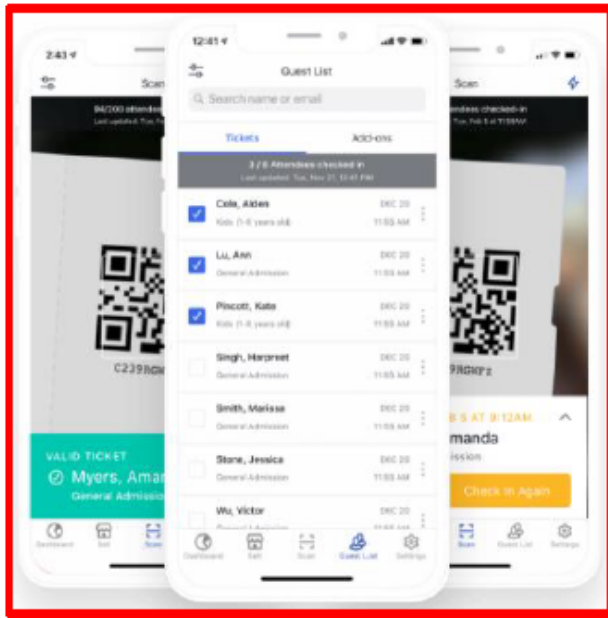
13 17. The Product uses a signal processing device and a visual input device,  
14 the visual input device affixed within the portable handheld housing. For example, a  
15 visual input device (e.g., camera for scanning QR code) and signal processing device  
16 (i.e. processor of mobile device) are affixed within the portable handheld housing  
17 (e.g., the housing of mobile device). The mobile device camera is used to a scan QR  
18 code via the BoxOffice application to obtain ticket details (i.e., time, date and event  
19 name) related to a particular event. Certain aspects of this element are illustrated in  
20 the screenshots below and/or those provided in connection with other allegations  
21 herein.  
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Source: <https://www.universe.com/boxoffice>

13           18.     The Product comprises digital files associated with the mobile device.  
14 For example, application has digital files (e.g., QR code image files and digital ticket  
15 and event details) associated with the mobile device. Certain aspects of this element  
16 are illustrated in the screenshots below and/or those provided in connection with other  
17 allegations herein.  
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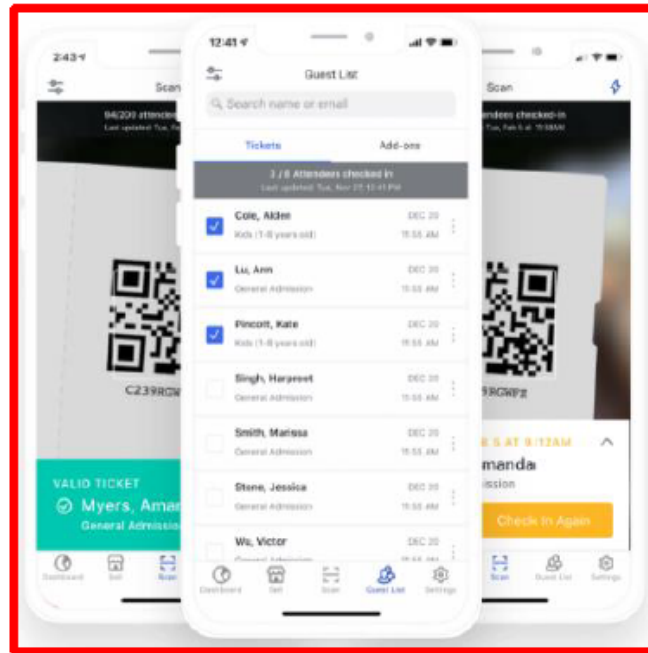
Source: <https://www.universe.com/boxoffice>

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 BoxOffice app communicates with a Universe server through a cloud communication network. The server has a look-up table (i.e. guest list), which is associated with guest details for a particular event). Also, the server database contains a plurality of bar codes (i.e. QR codes) containing information about the guests associated with each of the particular barcodes. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

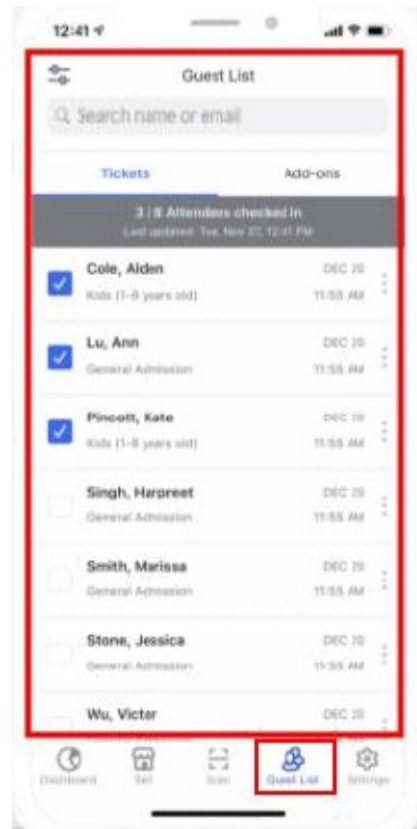


1 About Universe

2 Universe is a cloud-based social ticketing solution that allows its  
3 customers to sell tickets online, promote brands and manage  
4 online events such as food festivals, film festivals, music  
5 festivals, tech conferences and fundraisers. Primary features  
6 include ticket manager, event page creation, electronic ticketing,  
7 access keys, social media campaigns, reporting and analytics.

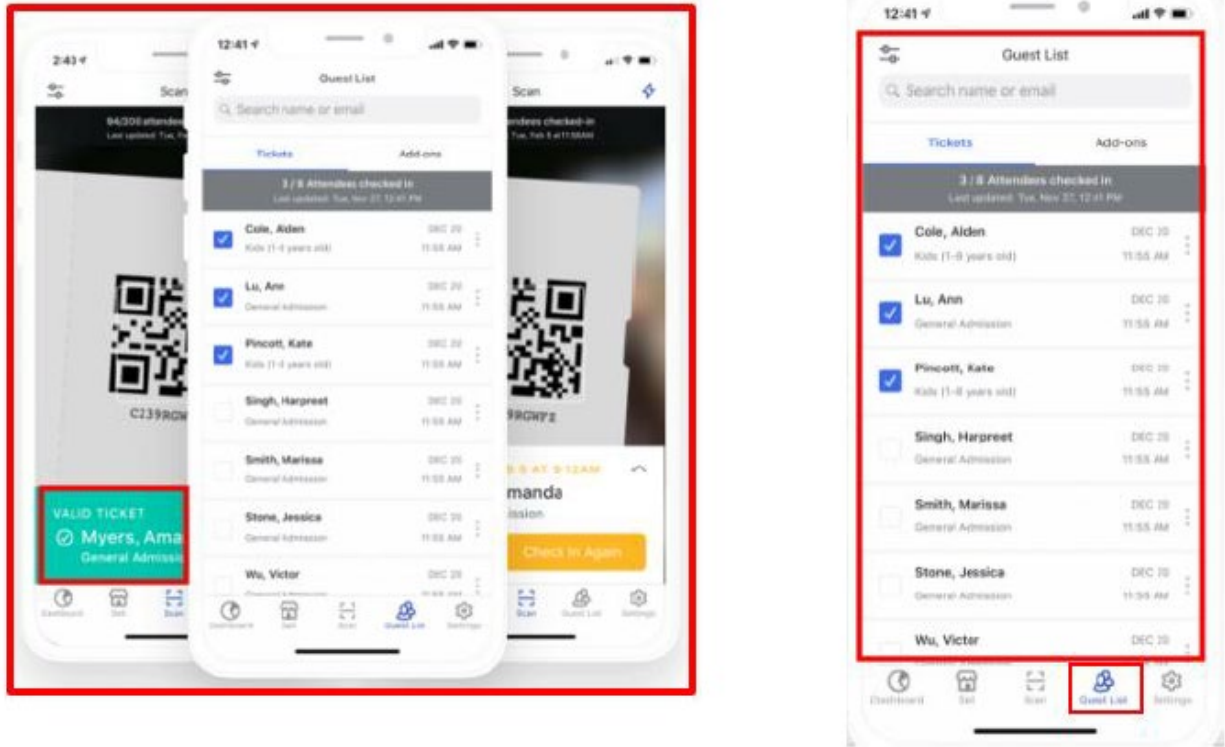


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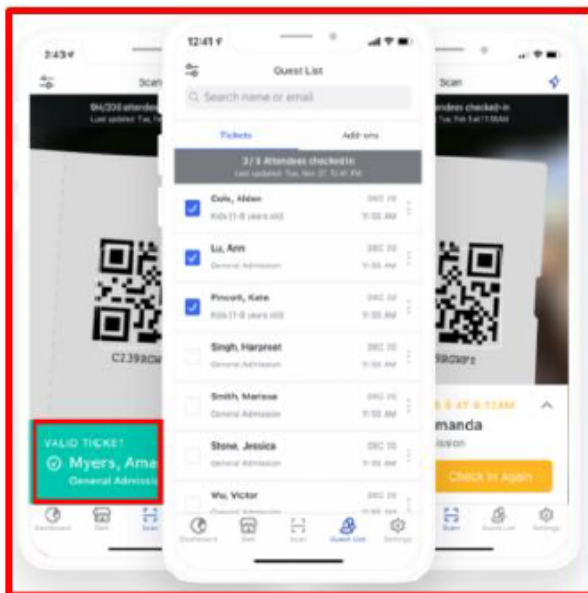
14  
15 Source: <https://www.universe.com/boxoffice>

16         20. The look-up table also stores a plurality of information link indicators,  
17 each information link indicator associated with a respective bar code and article of  
18 commerce. For example, the look-up table (i.e. BoxOffice database) also stores a  
19 plurality of information link indicators (e.g., link indicating availability and validity  
20 of scanned ticket online) indicating information associated with respective QR code.  
21 Certain aspects of this element are illustrated in the screenshots below and/or those  
22 provided in connection with other allegations herein.  
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Source : <https://www.universe.com/boxoffice>

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 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 a status signal (e.g., link indicating validation of scanned code ticket and details associated with ticket). The information associated with 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.



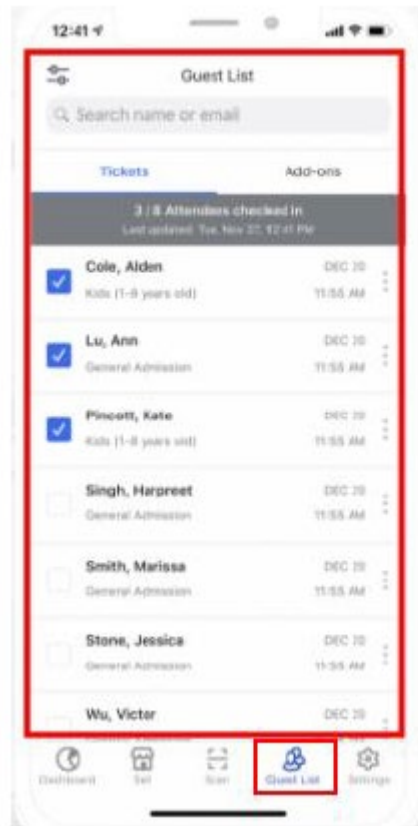
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## About Universe

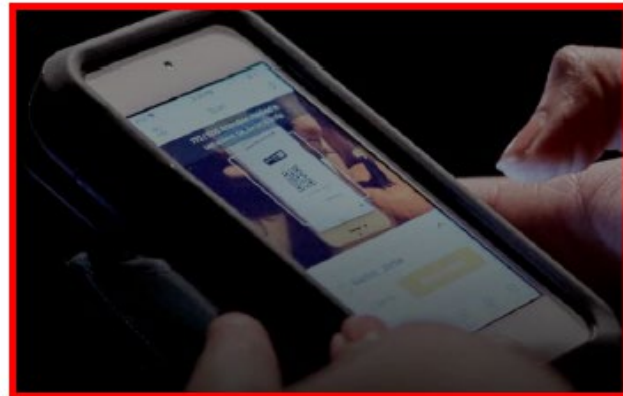
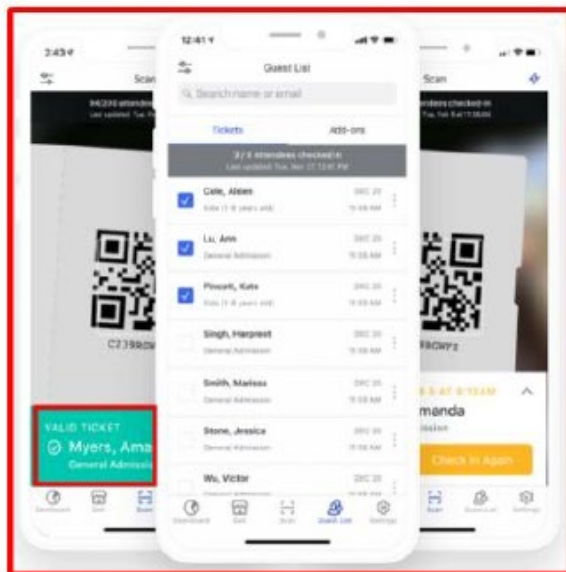
Universe is a cloud-based social ticketing solution that allows its customers to sell tickets online, promote brands and manage online events such as food festivals, film festivals, music festivals, tech conferences and fundraisers. Primary features include ticket manager, event page creation, electronic ticketing, access keys, social media campaigns, reporting and analytics.



Source: <https://www.universe.com/boxoffice>

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

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 (i.e. mobile device camera) is configured to scan an image of a QR code associated with an article of commerce (i.e. electronic ticket and/or associated event). After scanning the code, it is decoded to retrieve information about the ticket/event, which is 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.



## Scan with ease

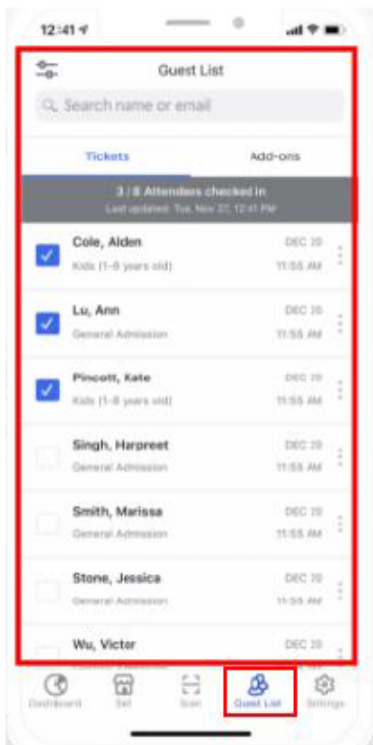
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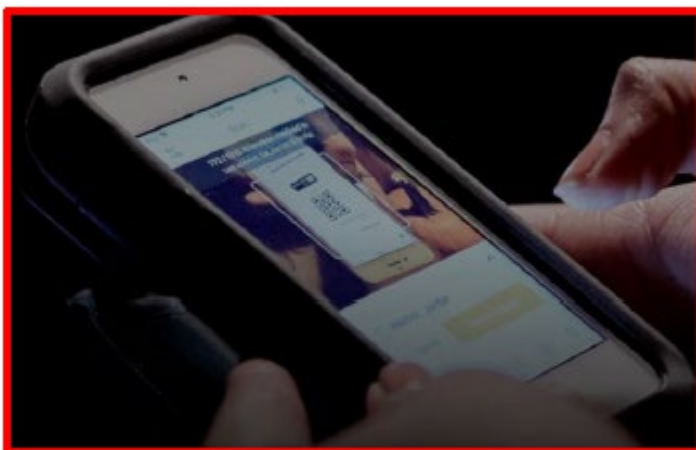
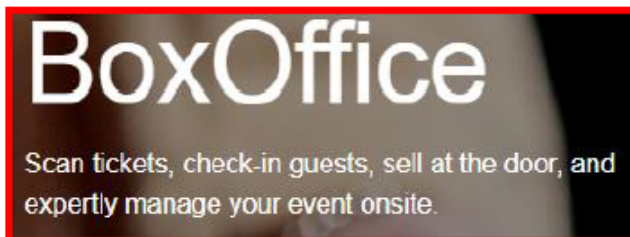
23. In response to receiving the bar code, the signal processing device (i.e. mobile device) is configured to look up the QR code in the look-up table (i.e. BoxOffice database) to determine from a respective information link (e.g., link indicating availability and validity of scanned barcode) whether or not information pertaining to an article of commerce associated with the code may be accessed via the 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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Source: <https://www.universe.com/boxoffice>  
Source: <https://www.softwareadvice.com/ticketing/universe-profile/>

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





1 (e) Award Plaintiff such further relief to which the Court finds Plaintiff  
2 entitled under law or equity.  
3

4 Dated: October 20, 2020

Respectfully submitted,

6 /s/ Stephen M. Lobbin

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9 San Diego, California 92037

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

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