

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SCANNING TECHNOLOGIES
INNOVATIONS LLC,

Plaintiff,

vs.

METAOPTION, LLC,

Defendant.

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Case No:

PATENT CASE

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 MetaOption, LLC (“Defendant” or “MetaOption”) 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 New Jersey limited liability company having a place of business at 2500 Plaza 5, 25th Floor, Harborside Financial Center, Jersey City,

NJ 07311.

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.

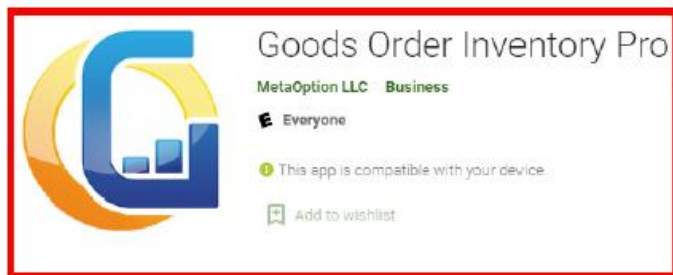
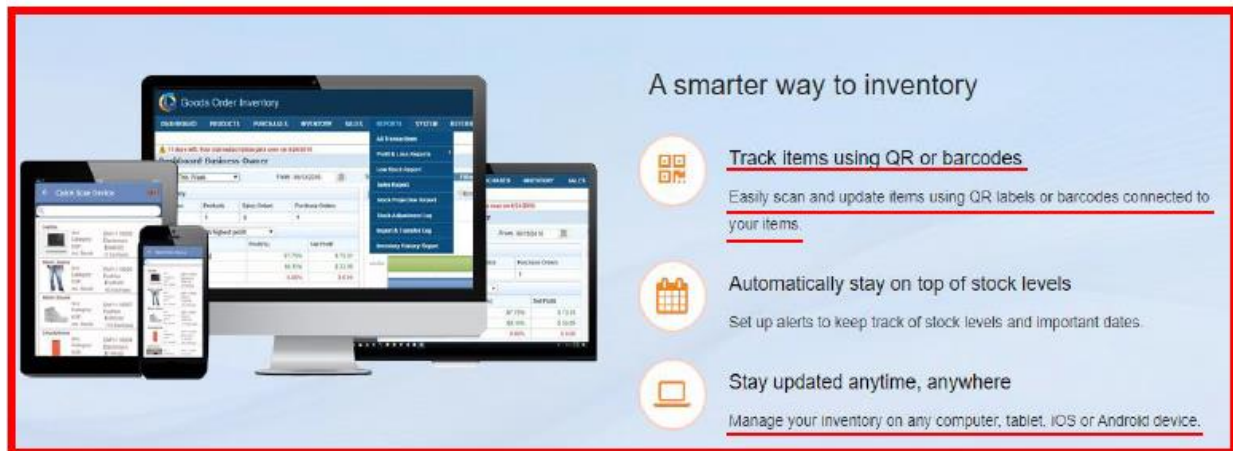
12. The '101 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

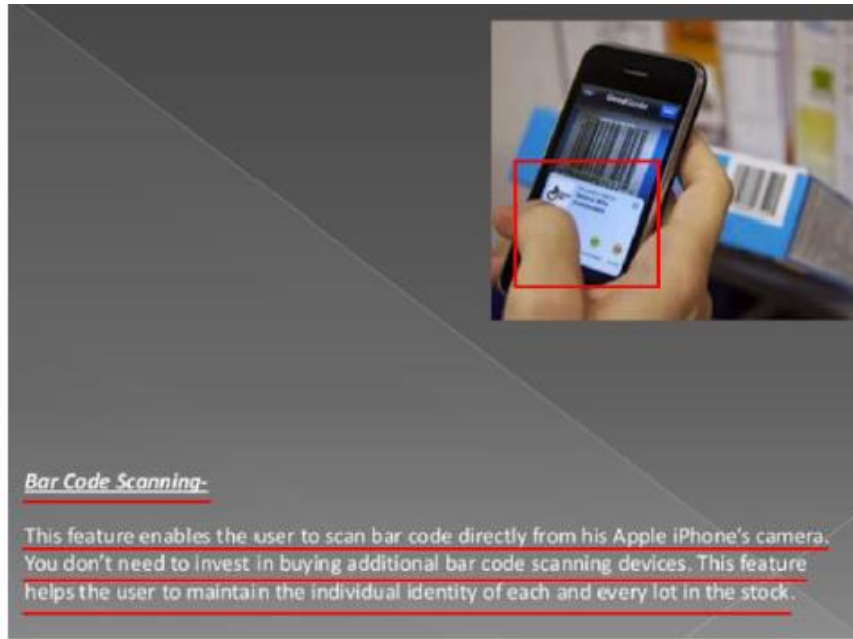
13. Upon information and belief, Defendant has infringed and continues to infringe

one or more claims, including at least Claim 1, of the ‘101 Patent by making, using, importing, selling, and/or offering for sale an inventory management system 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 inventory system including, without limitation, the Goods Order Inventory system, any associated hardware and software, and any similar products (collectively, “Product”), which infringe at least Claim 1 of the ‘101 Patent.

15. The Product provides an application for scanning barcodes to obtain a decoded link, which contains information about an article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



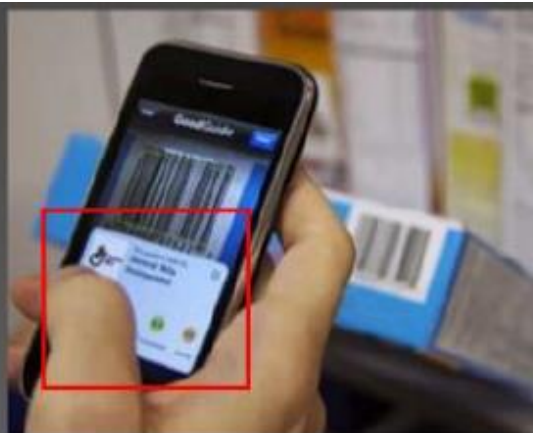


Source: <https://www.goodsorderinventory.com/>

Source: <https://www.slideshare.net/GOISPRO/application-for-apple-iphone>

Source: https://play.google.com/store/apps/details?id=com.metaoption.goodsorder&hl=en_IN&gl=US

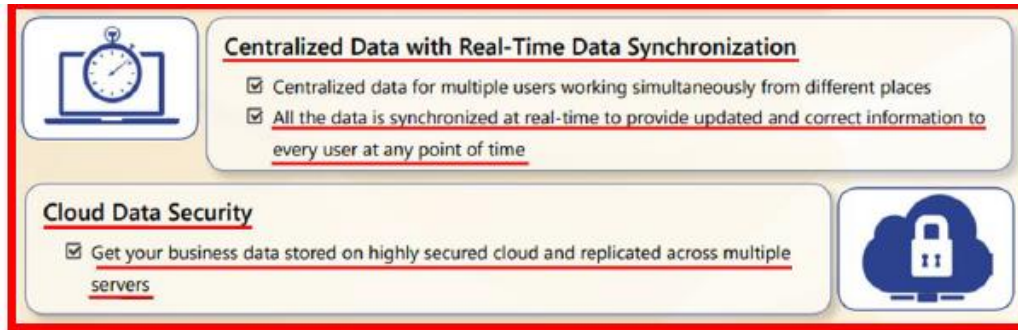
16. The Product includes a mobile device comprising a portable handheld housing and a communication interface configured to enable the mobile device to communicate with a communication network. For example, the Product incorporates a handheld device (e.g., mobile device with Product software) and a communication interface (i.e. cloud based communication interface) configured to enable the handheld 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.



Bar Code Scanning-

This feature enables the user to scan bar code directly from his Apple iPhone's camera. You don't need to invest in buying additional bar code scanning devices. This feature helps the user to maintain the individual identity of each and every lot in the stock.

Source: <https://www.slideshare.net/GOISPRO/application-for-apple-iphone>



Source: <https://www.goodsorderinventory.com/pdf/GOIS-Reseller%20Brochure.pdf>

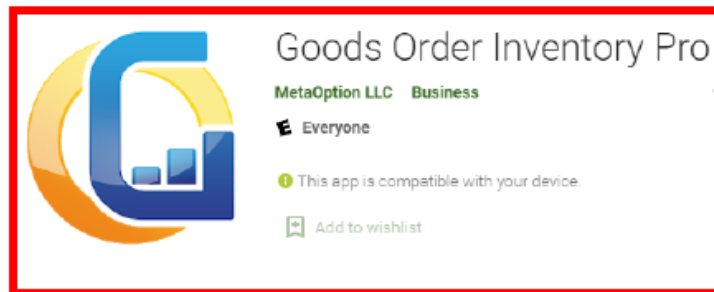
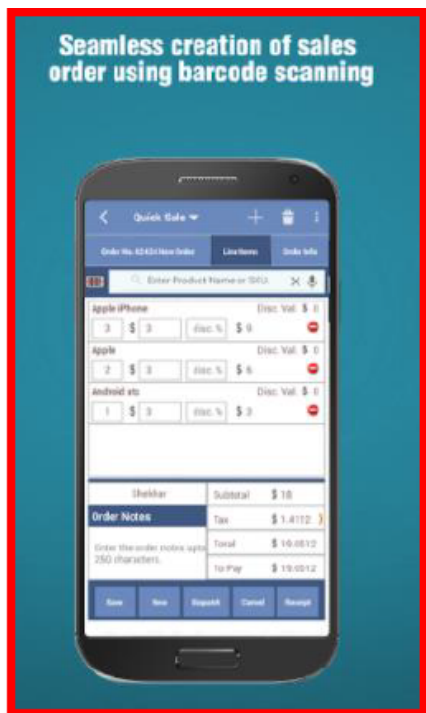
GOIS is a cloud based inventory and order management system that caters all types of businesses and runs over platforms like Web Browser, Android Smartphone/iOS operating devices.

Irrespective of what your core business size is, GOIS provides a skeleton on which your entire organization banks upon. A robust inventory management solution adds life to your business.

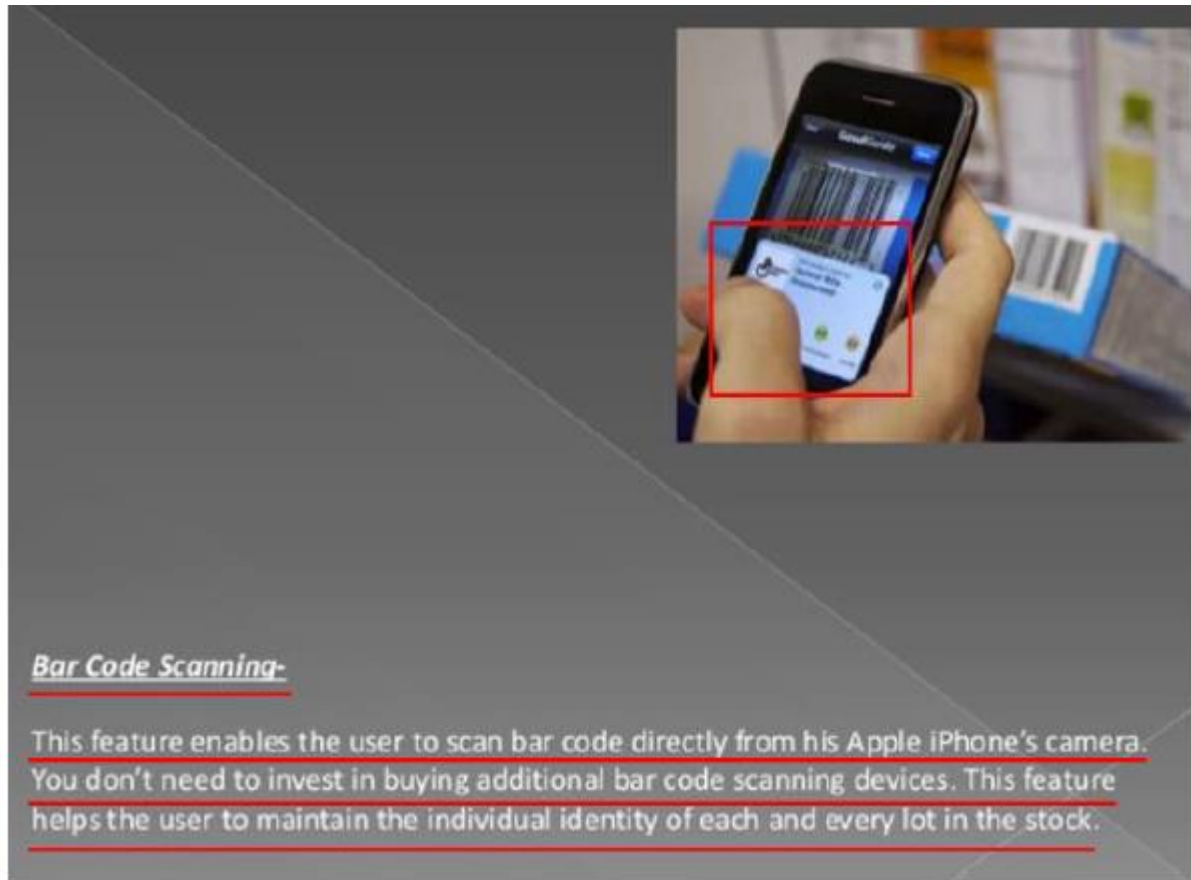
GOIS presents itself as a Software as a Service (SaaS) all-in-one business solution by integrating diverse business functions for every industry domain. GOIS is always ready to extend its support for you in dealing with chaotic situations created by countless inventory required in your business.

Source: <https://www.goodsorderinventory.com/about-us/>

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 signal processing device (i.e. processor of handheld device) are affixed within the portable handheld housing (e.g., the housing of the mobile device). The mobile device camera is used to scan a barcode and, via the Product's server, obtain details related to a particular product. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: https://play.google.com/store/apps/details?id=com.metaoption.goodsorder&hl=en_IN&gl=US



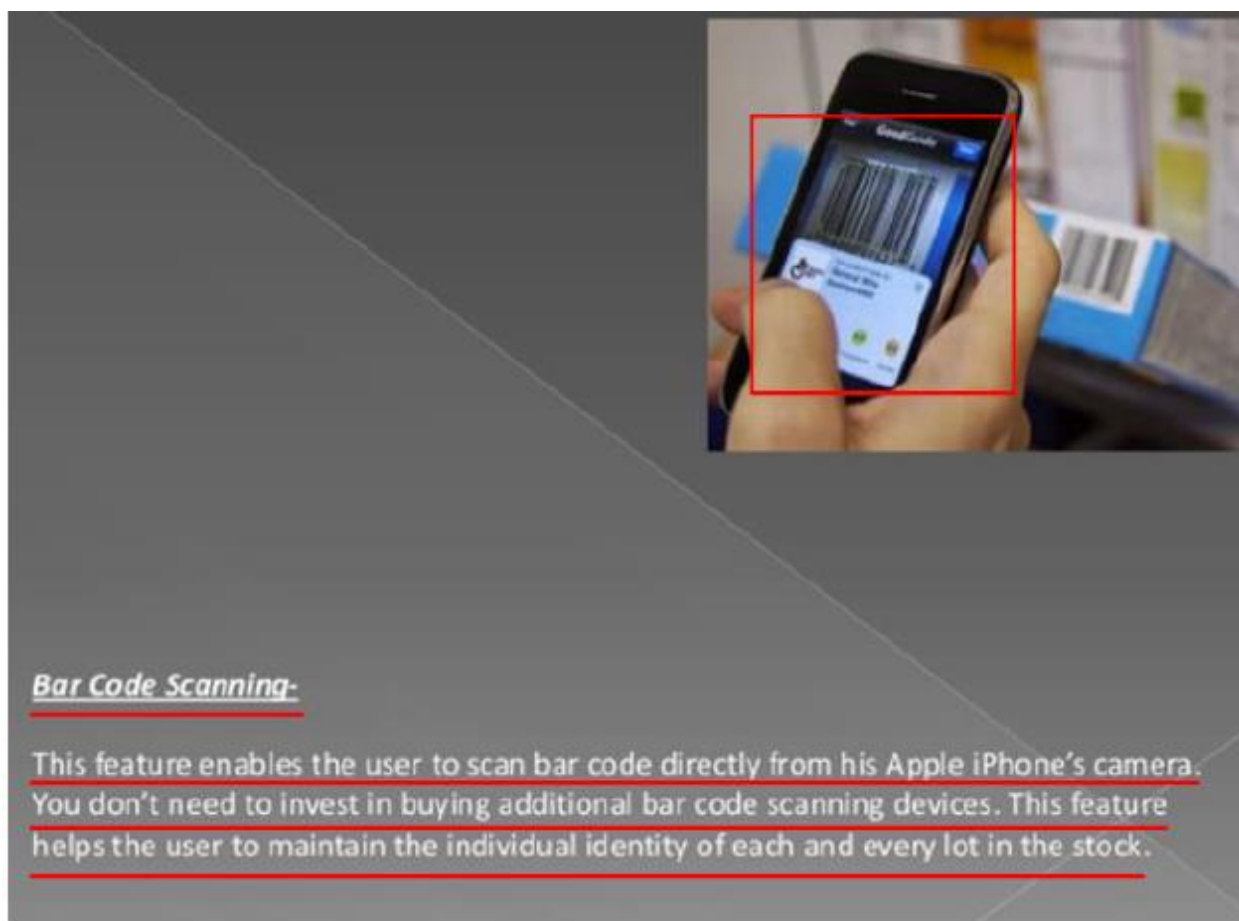
Source: <https://www.slideshare.net/GOISPRO/application-for-apple-iphone>

GOIS allows you to receive an equipment through automated barcode scanning and label printing technology using rear camera of your smartphone or Bluetooth scanner to update correct asset's inventory information and record digitally for auditing. Every check-in and check-out from your business inventory will be logged in with complete date-time, user, location and life-cycle information so as not to lose or misplace any precious equipment, thereby increasing the efficiency of identifying assets and reduce the potential for human error.

Source: <https://www.goodsorderinventory.com/asset-management/#>

18. The Product comprises digital files associated with the mobile device. For example, the Product application has digital files (e.g., barcode image files and digital product

information) 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.slideshare.net/GOISPRO/application-for-apple-iphone>

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 Product app communicates with a server through a cloud communication network, the server comprising look-up table (i.e. remote database). Also, the server database contains barcodes, each having associated information about a particular article of commerce. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with


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Centralized Data with Real-Time Data Synchronization

- ☒ Centralized data for multiple users working simultaneously from different places
- ☒ All the data is synchronized at real-time to provide updated and correct information to every user at any point of time

Cloud Data Security

- ☒ Get your business data stored on highly secured cloud and replicated across multiple servers



Source: <https://www.goodsorderinventory.com/pdf/GOIS-Reseller%20Brochure.pdf>

Product

Manage your business product list as per your requirement.

- Add, edit, filter, sort, and manage your items and many more key functions available to set your product information as per your needs.

Figure 39.1: Product Page (iOS)



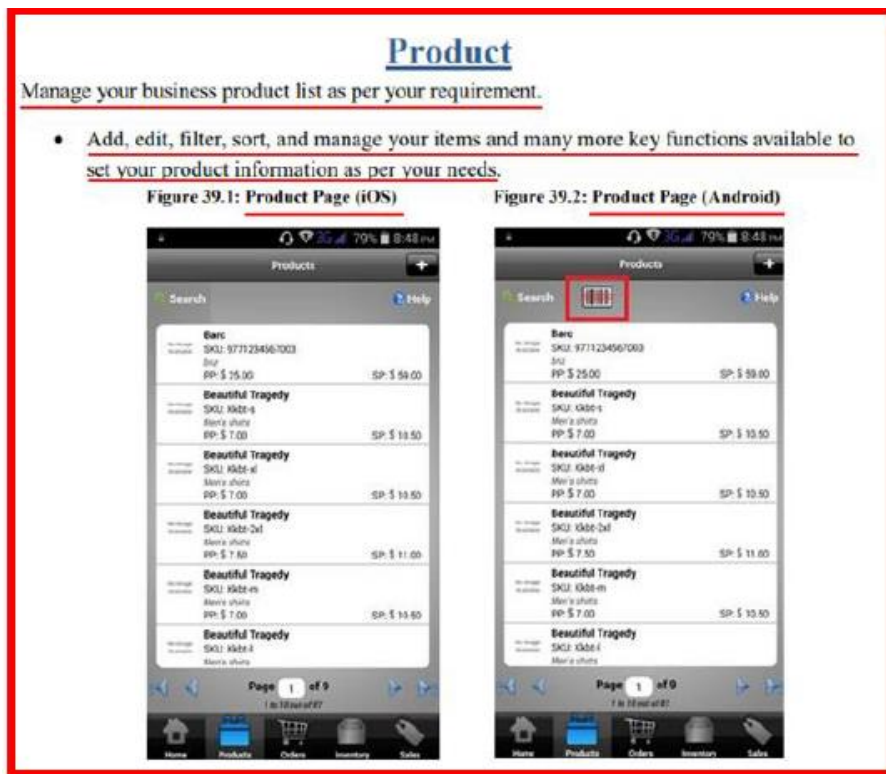


Figure 39.2: Product Page (Android)



Source: <https://www.goodsorderinventory.com/wp-content/themes/gios/images/User Manual Android iOS.pdf>

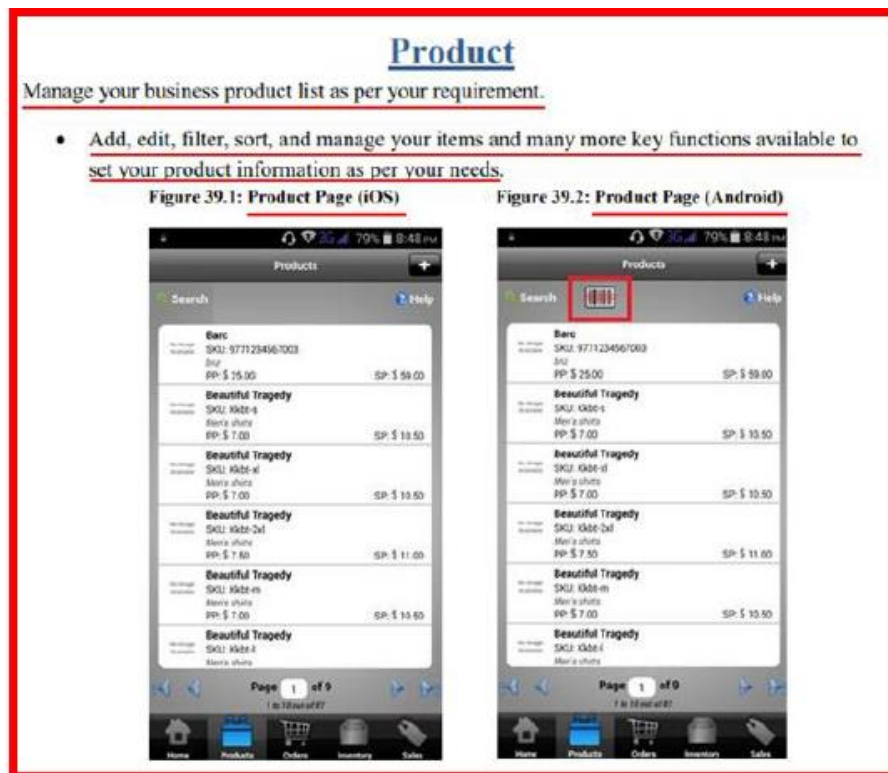
20. The look-up table also stores a plurality of information link indicators, each information link indicator associated with a respective bar code and article of commerce. For example, the look-up table (i.e. remote cloud database accessed by the Product app/software) also stores a plurality of information link indicators (e.g., link indicating scanned product and/or validation of scanned barcode details associated with the product) indicating information associated with a respective barcode. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



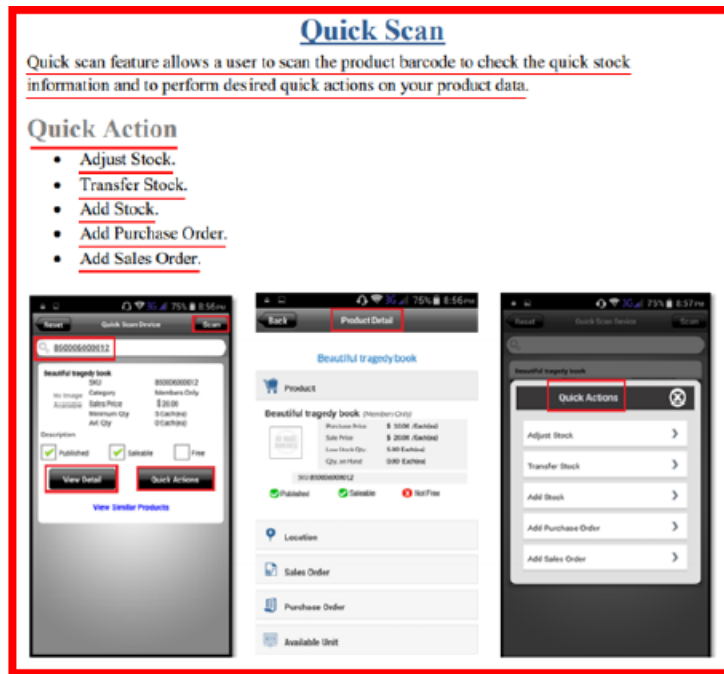
Source: https://www.goodsorderinventory.com/wp-content/themes/gios/images/User_Manual_Android_iOS.pdf

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 product and details associated with product). 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.



Source: https://www.goodsorderinventory.com/wp-content/themes/gios/images/User_Manual_Android_iOS.pdf



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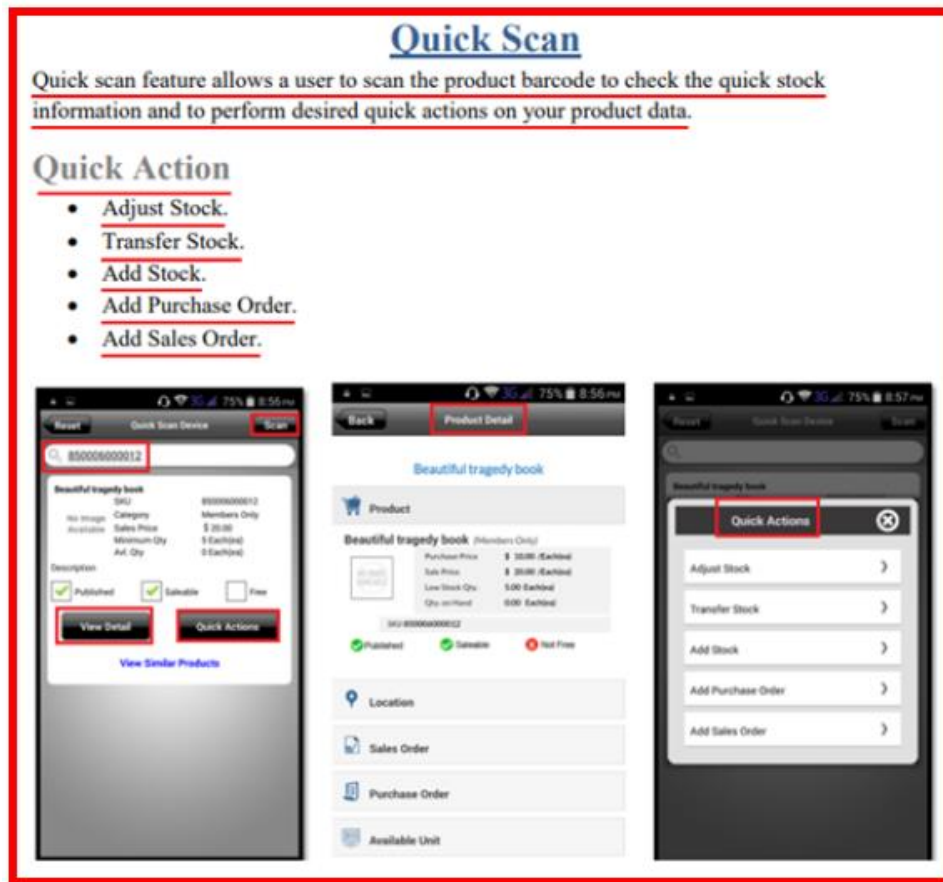
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Source: <https://www.goodsorderinventory.com/about-us/>


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. handheld device camera) is configured to scan an image of a barcode associated with an article of commerce. After scanning the code, the code is decoded using Product software, which may be located on the mobile device, to retrieve information about the product. The information 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.

23. In response to receiving the bar code, the signal processing device (i.e. mobile device) is configured to look up the code in the look-up table (i.e. remote database) to determine from a respective information link (e.g., link indicating validation of scanned barcode product) whether or not information pertaining to an article of commerce associated with the code (information about the associated product) 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.



Source: https://www.goodsorderinventory.com/wp-content/themes/gios/images/User_Manual_Android_iOS.pdf




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Figure 39.1: Product Page (iOS)





Figure 39.2: Product Page (Android)



Source: <https://www.goodsorderinventory.com/wp-content/themes/gios/images/User Manual Android iOS.pdf>

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: December 10, 2020

Respectfully submitted,

/s/ Mark A. Kriegel

MARK KRIEGEL

LAW OFFICE OF MARK A. KRIEGEL, LLC

1479 Pennington Rd.

Ewing, NJ 08618

(609) 883-5133

Fax: (609) 450-7237

mkriegel@kriegellaw.com

ATTORNEYS FOR PLAINTIFF

EXHIBIT A