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SML AVVOCATI P.C.  
888 Prospect Street, Suite 200  
San Diego, California 92037  
(949) 636-1391 (Phone)

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

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

SCANNING TECHNOLOGIES  
INNOVATIONS, LLC,  
  
*Plaintiff,*  
  
v.  
  
YAPSODY ENTERTAINMENT, INC.,  
  
*Defendant.*

CASE NO. 2:21-cv-00003

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

Pursuant to F.R.C.P. 15(a)(1)(B), Plaintiff Scanning Technologies Innovations, LLC (“Plaintiff” or “STI”) files this Original Complaint against Yapsody Entertainment, Inc. (“Defendant” or “Yapsody”) 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.

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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 California corporation having a place of business at 2198 Century Hill, Los Angeles, CA 90067. On information and belief, Defendant may be served through its registered agent, Darren Mark Seiden, at the same address.

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)**

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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. The ‘101 Patent describes systems and methods for downloading a look-  
17 up table from a server database to a mobile device via a communication network.  
18 ‘101 Patent, Abstract. The look-up table is configured to store a plurality of code  
19 numbers associated with articles of commerce and a plurality of information link  
20 indicators. *Id.* Each indicator is associated with a respective code and article of  
21 commerce, and indicates the existence of a link to information about the article of  
22 commerce. *Id.*  
23  
24

25 14. The ‘101 Patent recognizes problems associated with prior systems  
26 including that the mobile devices of prior systems take time to connect to the Internet  
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1 in order to access product information. ‘101 Patent, 1:59-67. Also, prior systems  
2 don’t readily indicate whether there is a link to additional information about the  
3 product. *Id.*

4  
5 15. Thus, the ‘101 Patent recognized a need to allow a consumer to readily  
6 determine whether product information is available for a product having an associated  
7 product code. ‘101 Patent, 2: 3:11. A further need existed for a mobile device to  
8 allow a consumer offline access to immediately determine whether the product  
9 information was available. *Id.*

10  
11 16. In certain embodiments, the ‘101 Patent includes a mobile device that is  
12 configured to download a look-up table from a server and store the look-up table in a  
13 local database. ‘101 Patent, 2:35-48. In response to receiving scan information  
14 regarding a product code, a processing device on the mobile device is configured to  
15 look up the code in the look-up table to determine whether or not a link to information  
16 about the associated product is available. *Id.*

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19 17. The ‘101 Patent solves problems with the art that are rooted in computer  
20 technology and that are associated with inventory management and the retrieval of  
21 information associated with articles of commerce. The ‘101 Patent claims do not  
22 merely recite the performance of some business practice known from the pre-Internet  
23 world along with the requirement to perform it on the Internet.

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25  
26 18. The improvements of the ‘101 Patent and the features recited in the  
27 claims in the ‘101 Patent provide improvements to conventional hardware and  
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1 software systems and methods. The improvements render the claimed invention of  
2 the '101 Patent non-generic in view of conventional components.

3 19. The improvements of the '101 Patent and the features recitations in the  
4 claims of the '101 Patent are not those that would be well-understood, routine or  
5 conventional to one of ordinary skill in the art at the time of the invention.  
6

7 20. Upon information and belief, Defendant has infringed and continues to  
8 infringe one or more claims, including at least Claim 1, of the '101 Patent by making,  
9 using, importing, selling, and/or offering for sale an event ticket management system  
10 covered by one or more claims of the '101 Patent. Defendant has infringed and  
11 continues to infringe the '101 Patent directly in violation of 35 U.S.C. § 271.  
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14 21. Defendant sells, offers to sell, and/or uses an inventory system including,  
15 without limitation, the Yapsody ticket management system, the YapScan app, any  
16 associated hardware and software, and any similar products (collectively, "Product"),  
17 which infringe at least Claim 1 of the '101 Patent.  
18

19 22. The Product provides an application for scanning barcodes to obtain a  
20 decoded link, which contains information about an article of commerce. Among other  
21 things, the Product provides an event ticket management solution in which a ticket  
22 can be scanned (e.g., by way of a QR code present on the ticket) to obtain a decoded  
23 link, which contains information about an article of commerce (e.g., to display  
24 information related to a ticket when the code is scanned). Certain aspects of this  
25 element are illustrated in the screenshots below and/or those provided in connection  
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1 with other allegations herein.



3

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## 5 QR Code Ticket Scanner for

## 6 Event Ticketing.

7

8

9 We built a cutting-edge **event ticketing system** to support our own major concert

10 events and then rolled it out to presenters worldwide at an **amazing price.**

11 *Source:* <https://www.yapsody.com/ticketing/qr-code-ticket-scanner-for-event-ticketing/>

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## **Ticket Scanning Process.**

What really happens when a ticket is scanned? The information from the QR Code is verified by sending it to the Yapsody account, ensuring the tickets are validated instantly.

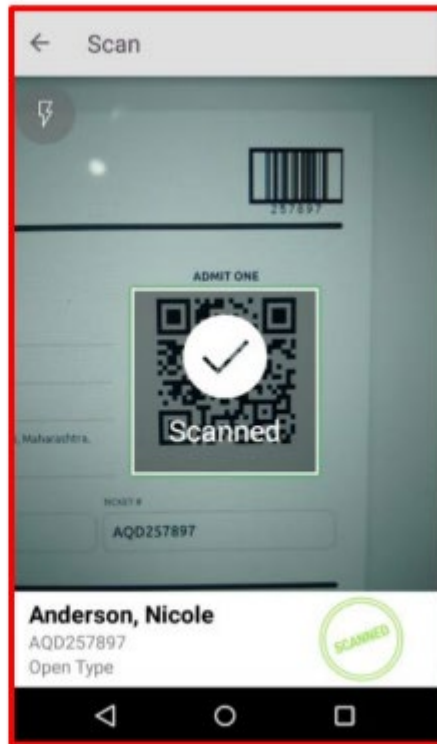
Yapsody's online event ticketing system offers its presenters a unique custom-designed app called "YapScan" specifically used to scan tickets. Features like photo scanning, laser scanning for quick entry and search-by-attendee-name and ticket number make the venue loading experience smooth and hassle-free.

## **How the QR Code Ticket Scanner works.**

Once the attendee has booked the event, an email confirming the order is sent to them. The email consists of an E-ticket with a unique QR Code that contains information regarding the customer details, the ticket purchased and QR Code ID.

Source: <https://www.yapsody.com/ticketing/qr-code-ticket-scanner-for-event-ticketing/>

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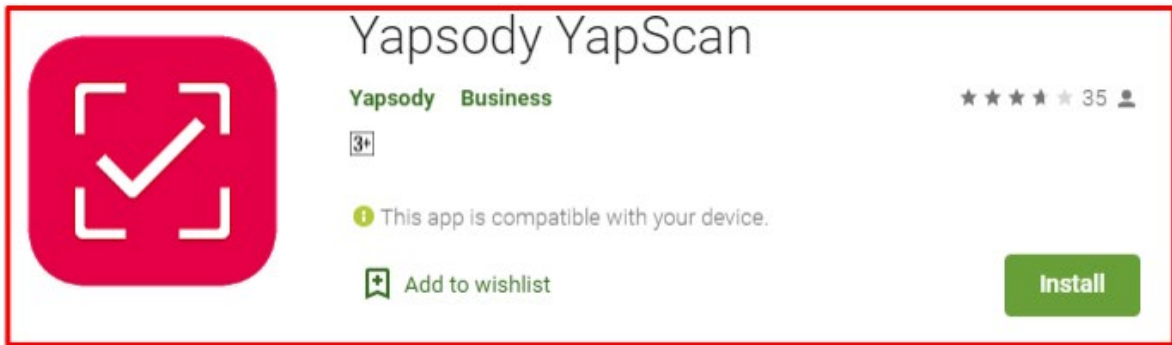


*Source:* <https://play.google.com/store/apps/details?id=com.youscan.android>

23. 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 and/or Internet) configured to enable the handheld device to communicate with a 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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Yapsody YapScan

Yapsody Business

3+

This app is compatible with your device.

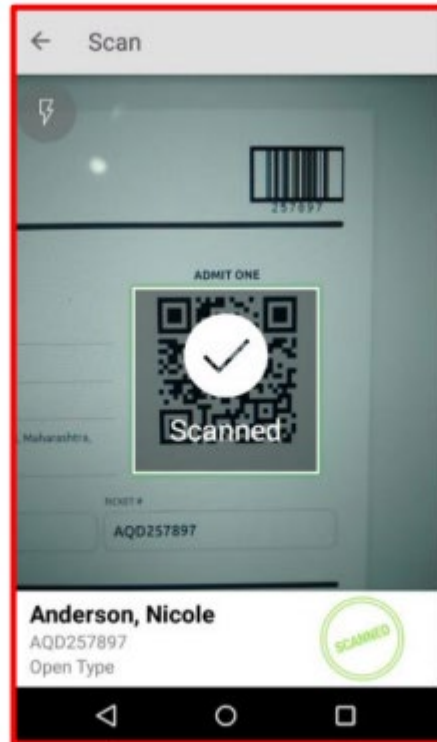
Add to wishlist

Install

- With the Yapsody Yapscan App you can:
- Easily validate tickets by-
  - Scanning e-ticket QR codes using device's camera
  - Manually entering the names or e-ticket numbers of the attendees
  - View live sales and analyze attendee information.
  - Schedule a specific scan time when your staff can start scanning tickets.
  - Real-time syncing between your devices and Yapsody servers.
  - Assign Scan permission to a specific user accounts.
  - Have different alerts for specific ticket types.
  - Even if your Internet connection goes down, you can continue scanning as tickets are downloaded on the device itself. Yapsody servers will automatically reconnect with YapScan servers as soon as connection is restored.

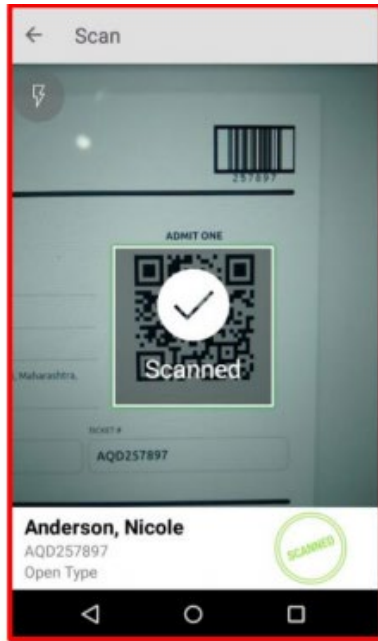
Source: <https://play.google.com/store/apps/details?id=com.youscan.android>

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Source: <https://play.google.com/store/apps/details?id=com.youscan.android>

24. 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 code and, via the Product's server, obtain details related to a particular product (e.g., details about the ticket and event associated with the ticket). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



## Scanning Devices.

### Mobile QR code scanner

We've created "YapScan", an app specifically designed to scan tickets easily through your Android or iOS (iPhone / iPod Touch) device.

YapScan offers 4 options to validate your attendees.

- Laser scanning technology for quick entry with a compatible laser attachment
- Photo scanning using the built-in camera
- Search by attendee name
- Search by ticket number

13 *Source:* <https://play.google.com/store/apps/details?id=com.youscan.android>

14 *Source:* <https://www.yapsody.com/ticketing/qr-code-ticket-scanner-for-event-ticketing/>

## Ticket Scanning Process.

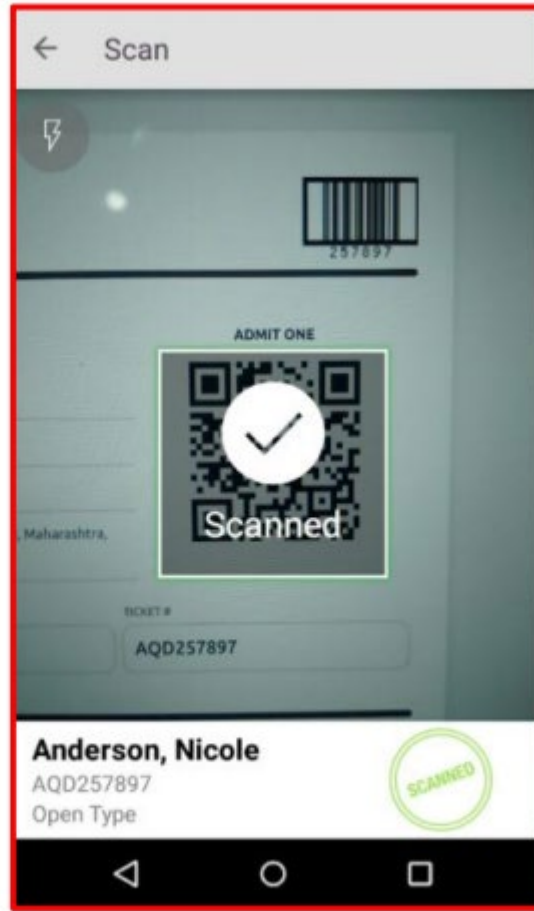
What really happens when a ticket is scanned? The information from the QR Code is verified by sending it to the Yapsody account, ensuring the tickets are validated instantly.

Yapsody's online event ticketing system offers its presenters a unique custom-designed app called "YapScan" specifically used to scan tickets. Features like photo scanning, laser scanning for quick entry and search-by-attendee-name and ticket number make the venue loading experience smooth and hassle-free.

Source: <https://www.yapsody.com/ticketing/qr-code-ticket-scanner-for-event-ticketing/>

25. The Product comprises digital files associated with the mobile device. For example, the Product application has digital files (e.g., code image files, logos, 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.

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Source: <https://play.google.com/store/apps/details?id=com.youscan.android>

## How the QR Code Ticket Scanner works.

Once the attendee has booked the event, an email confirming the order is sent to them. The email consists of an E-ticket with a unique QR Code that contains information regarding the customer details, the ticket purchased and QR Code ID.

Source: <https://www.yapsody.com/ticketing/qr-code-ticket-scanner-for-event-ticketing/>

26. 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 the communication network. The server has a look-up table (i.e., remote database storing ticket details). Also, the server database contains codes, 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 other allegations herein.

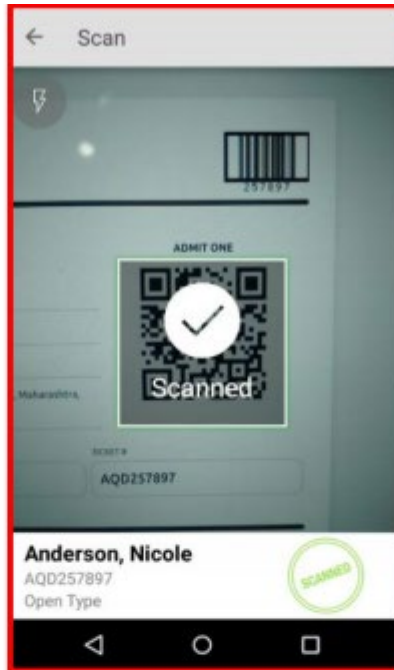
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With the Yapsody Yapscan App you can:

- Easily validate tickets by-
- Scanning e-ticket QR codes using device's camera
- Manually entering the names or e-ticket numbers of the attendees
- View live sales and analyze attendee information.
- Schedule a specific scan time when your staff can start scanning tickets.
- Real-time syncing between your devices and Yapsody servers.
- Assign Scan permission to a specific user accounts.
- Have different alerts for specific ticket types.
- Even if your Internet connection goes down, you can continue scanning as tickets are downloaded on the device itself. Yapsody servers will automatically reconnect with YapScan servers as soon as connection is restored.

Source: <https://play.google.com/store/apps/details?id=com.youscan.android>

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Source: <https://play.google.com/store/apps/details?id=com.youscan.android>

## How the QR Code Ticket Scanner works.

Once the attendee has booked the event, an email confirming the order is sent to them. The email consists of an E-ticket with a unique QR Code that contains information regarding the customer details, the ticket purchased and QR Code ID.

Source: <https://www.yapsody.com/ticketing/qr-code-ticket-scanner-for-event-ticketing/>



## **Event Registration Information**

Your client would stay updated through a data management software on the number of event attendees, total registrations, and the expected turnout. Keeping the event data organized is the first thing if you want to please the clients. Yapsody, take your event registration software to the next level.

## **Real-time Attendance Data**

It is hard to collect event data that showcases attendance in real-time, but with features such as mobile confirmation and real-time synchronization can streamline your event management websites. With a database management software, it becomes easier to do so.

## **Email Campaign Success**

Email campaigns are crucial for any successful event or concert. The ratio of the total target population and the conversation ratio are key metrics your boss will be keeping a keen eye on. A good online event management system always provides you the click-through rate (CTR), open rate and bounce rate which are helpful in gauging the effectiveness of your marketing strategy.

Source: <https://www.yapsody.com/ticketing/blog/the-most-important-tips-about-managing-events-data/>

27. 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 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 code details associated with the product, such as details associated with the ticket and/or the event associated with the ticket) indicating information associated with a respective code. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

28. 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 a  
3 status signal indicating the existence or absence of a link to information about a  
4 respective article of commerce (e.g., link indicating validation of scanned QR code  
5 ticket and details associated with ticket). The information associated with the link is  
6 retrieved through the communication network. Certain aspects of this element are  
7  
8 illustrated in the screenshots below and/or those provided in connection with other  
9  
10 allegations herein.

## How the QR Code Ticket Scanner works.

Once the attendee has booked the event, an email confirming the order is sent to them. The email consists of an E-ticket with a unique QR Code that contains information regarding the customer details, the ticket purchased and QR Code ID.

## Ticket Scanning Process.

What really happens when a ticket is scanned? The information from the QR Code is verified by sending it to the Yapsody account, ensuring the tickets are validated instantly.

Yapsody's online event ticketing system offers its presenters a unique custom-designed app called "YapScan" specifically used to scan tickets. Features like photo scanning, laser scanning for quick entry and search-by-attendee-name and ticket number make the venue loading experience smooth and hassle-free.

Source: <https://www.yapsody.com/ticketing/qr-code-ticket-scanner-for-event-ticketing/>

## Using The YapScan App On iOS & Android

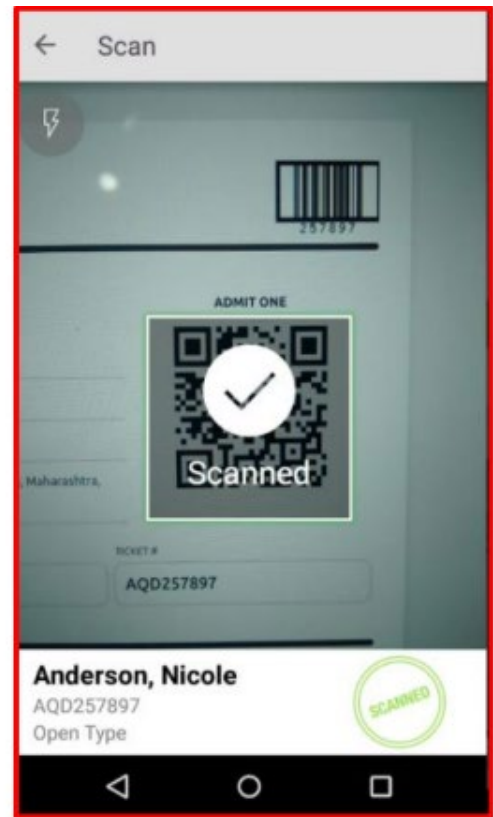
Home

At Yapsody, we're constantly streamlining our end-to-end event ticketing processes. With everything available in the palm of your hands, the ability to validate tickets should also be. With our YapScan ticket scanner on iOS and Android, you can scan and validate event tickets by:

- Photo scanning using the built-in camera
- Laser scanning for quick entry with a compatible laser attachment
- Searching attendee name
- Searching ticket number

All the data is synced in real time between your mobile devices and our servers to prevent the same ticket from being used at multiple entry points.

Source: <https://www.yapsody.com/ticketing/guide/event-day-checklist/yapscan/using-the-yapscan-app-on-ios-android/>



Source: <https://play.google.com/store/apps/details?id=com.youscan.android>

1           29. The visual input device is configured to scan an image of an article of  
2 commerce, decode the image to obtain a code and forward data from the scanned  
3 image to the signal processing device. For example, the visual input device (i.e.,  
4 handheld device camera) is configured to scan an image of a code associated with an  
5 article of commerce. After scanning the code, the code is decoded using Product  
6 software, which may be located on the mobile device, to retrieve information about  
7 the product. The information is forwarded to the signal processing device (i.e.,  
8 processor of mobile device). Certain aspects of this element are illustrated in the  
9 screenshots below and/or those provided in connection with other allegations herein.  
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13           30. In response to receiving the bar code, the signal processing device (i.e.,  
14 mobile device) is configured to look up the code in the look-up table (i.e., remote  
15 database) to determine from a respective information link (e.g., link to ticket/event  
16 information) whether or not information pertaining to an article of commerce  
17 associated with the code (information about the associated ticket/event) may be  
18 accessed via the communication network. Certain aspects of this element are  
19 illustrated in the screenshots below and/or those provided in connection with other  
20 allegations herein.  
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1 With the Yapsody Yapsody App you can:

- 2 • Easily validate tickets by-
- 3 • Scanning e-ticket QR codes using device's camera
- 4 • Manually entering the names or e-ticket numbers of the attendees
- 5 • View live sales and analyze attendee information.
- 6 • Schedule a specific scan time when your staff can start scanning tickets.
- 7 • Real-time syncing between your devices and Yapsody servers.
- 8 • Assign Scan permission to a specific user accounts.
- 9 • Have different alerts for specific ticket types.
- 10 • Even if your Internet connection goes down, you can continue scanning as tickets are downloaded on the device itself. Yapsody servers will automatically reconnect with YapScan servers as soon as connection is restored.

11 Source: <https://play.google.com/store/apps/details?id=com.youscan.android>

## 12 Event Registration Information

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23 Source: <https://www.yapsody.com/ticketing/blog/the-most-important-tips-about-managing-events-data/>

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

3 32. Defendant's actions complained of herein are causing irreparable harm  
4 and monetary damage to Plaintiff and will continue to do so unless and until  
5 Defendant is enjoined and restrained by this Court.  
6

7 33. Plaintiff is in compliance with 35 U.S.C. § 287.  
8

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff asks the Court to:

11 (a) Enter judgment for Plaintiff on this Complaint on all causes of action  
12 asserted herein;  
13

14 (b) Enter an Order enjoining Defendant, its agents, officers, servants,  
15 employees, attorneys, and all persons in active concert or participation with Defendant  
16 who receive notice of the order from further infringement of United States Patent No.  
17 10,600,101 (or, in the alternative, awarding Plaintiff a running royalty from the time of  
18 judgment going forward);  
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21 (c) Award Plaintiff damages resulting from Defendant's infringement in  
22 accordance with 35 U.S.C. § 284;  
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24 (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and  
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1 (e) Award Plaintiff such further relief to which the Court finds Plaintiff  
2 entitled under law or equity.

3  
4 Dated: January 4, 2021

Respectfully submitted,

5 /s/ Stephen M. Lobbin

6 Stephen M. Lobbin

7 sml@smlavvocati.com

8 SML AVVOCATI P.C.

9 888 Prospect Street, Suite 200

10 San Diego, California 92037

11 (949) 636-1391 (Phone)

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