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

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

9
10 SCANNING TECHNOLOGIES
INNOVATIONS, LLC

11 *Plaintiff,*

12
13 v.

14 EVENTS.COM, INC.,

15 *Defendant.*

CASE NO.: '21CV0360 AJB MDD

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

17 Plaintiff Scanning Technologies Innovations, LLC (“Plaintiff” or “STI”) files
18 this Complaint against Events.com, Inc. (“Defendant”) for infringement of United
19 States Patent No. 10,600,101 (hereinafter “the ‘101 Patent”).

20
21 **PARTIES AND JURISDICTION**

22
23 1. This is an action for patent infringement under Title 35 of the United
24 States Code. Plaintiff is seeking injunctive relief as well as damages.

25
26 2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331
27 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent
28 infringement arising under the United States patent statutes.

1 9. This cause of action arises under the patent laws of the United States
2 and, in particular, under 35 U.S.C. §§ 271, *et seq.*

3 10. Plaintiff is the owner by assignment of the ‘101 Patent with sole rights
4 to enforce the ‘101 Patent and sue infringers.
5

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

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

13 13. The ‘101 Patent describes systems and methods for downloading a look-
14 up table from a server database to a mobile device via a communication network.
15 ‘101 Patent, Abstract. The look-up table is configured to store a plurality of code
16 numbers associated with articles of commerce and a plurality of information link
17 indicators. *Id.* Each indicator is associated with a respective code and article of
18 commerce, and indicates the existence of a link to information about the article of
19 commerce, and indicates the existence of a link to information about the article of
20 commerce. *Id.*
21

22 14. The ‘101 Patent recognizes problems associated with prior systems
23 including that the mobile devices of prior systems take time to connect to the Internet
24 in order to access product information. ‘101 Patent, 1:59-67. Also, prior systems
25 don’t readily indicate whether there is a link to additional information about the
26 product. *Id.*
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1 15. Thus, the ‘101 Patent recognized a need to allow a consumer to readily
2 determine whether product information is available for a product having an associated
3 product code. ‘101 Patent, 2: 3:11. A further need existed for a mobile device to
4 allow a consumer offline access to immediately determine whether the product
5 information was available. *Id.*
6

7 16. In certain embodiments, the ‘101 Patent includes a mobile device that is
8 configured to download a look-up table from a server and store the look-up table in a
9 local database. ‘101 Patent, 2:35-48. In response to receiving scan information
10 regarding a product code, a processing device on the mobile device is configured to
11 look up the code in the look-up table to determine whether or not a link to information
12 about the associated product is available. *Id.*
13
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15 17. The ‘101 Patent solves problems with the art that are rooted in computer
16 technology and that are associated with inventory management and the retrieval of
17 information associated with articles of commerce. The ‘101 Patent claims do not
18 merely recite the performance of some business practice known from the pre-Internet
19 world along with the requirement to perform it on the Internet.
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22 18. The improvements of the ‘101 Patent and the features recited in the
23 claims in the ‘101 Patent provide improvements to conventional hardware and
24 software systems and methods. The improvements render the claimed invention of
25 the ‘101 Patent non-generic in view of conventional components.
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1 19. The improvements of the ‘101 Patent and the features recitations in the
2 claims of the ’101 Patent are not those that would be well-understood, routine or
3 conventional to one of ordinary skill in the art at the time of the invention.
4

5 20. Upon information and belief, Defendant has infringed and continues to
6 infringe one or more claims, including at least Claim 1, of the ‘101 Patent by making,
7 using, importing, selling, and/or offering for sale an event ticket management system
8 covered by one or more claims of the ‘101 Patent. Defendant has infringed and
9 continues to infringe the ‘101 Patent directly in violation of 35 U.S.C. § 271.
10

11 21. Defendant sells, offers to sell, and/or uses an inventory system including,
12 without limitation, the Events.com ticket management platform, any associated apps,
13 hardware and/or software, and any similar products (collectively, “Product”), which
14 infringe at least Claim 1 of the ‘101 Patent.
15

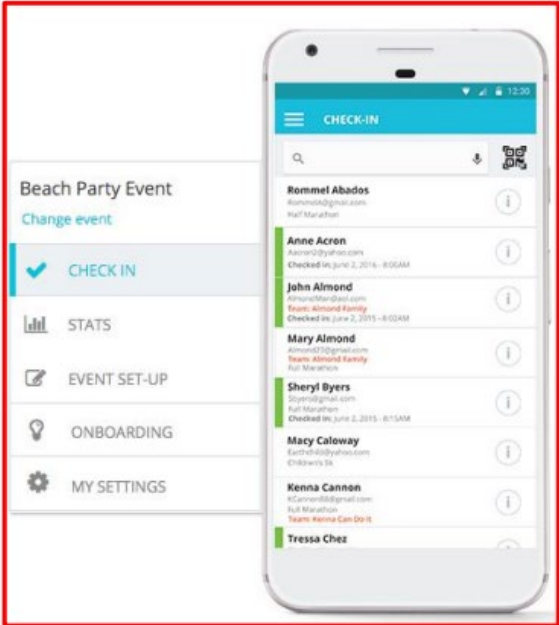
16 22. The Product provides an application for scanning QR codes to obtain a
17 decoded link, which contains information about an article of commerce. Among other
18 things, the Product provides an event ticket management solution in which a ticket
19 can be scanned (e.g., by way of a QR code present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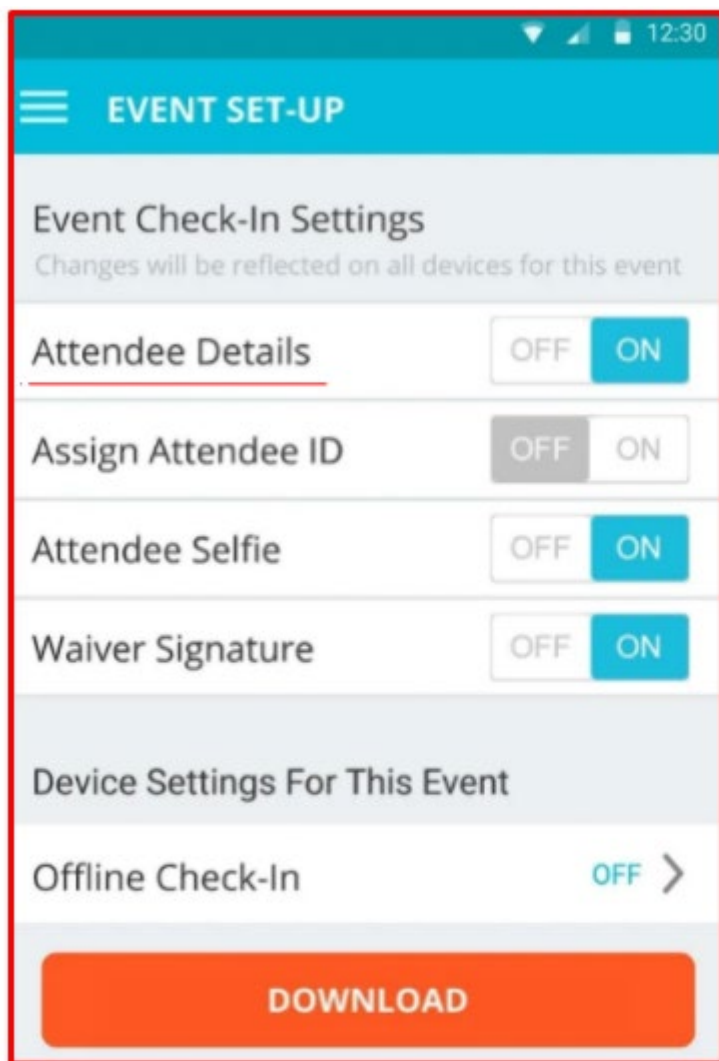
Manage Guests with a Seamless Mobile Check-In

Forget the hassle of paper! The free Event Assistant App enables fast entry using voice-recognition technology or scanning QR code.



- 1 **Attendee Details**
View all of your attendees details at Check-in, like email, purchases, and answers to form questions
- 2 Assign your attendees their ID number at Check-in. Things like bib numbers, badge number, etc.
- 3 Add some fun to the process by having your attendees take a quick Check-in selfie
- 4 Collect your attendee's waiver signature with our simple touch screen signing feature
- 5 Have wifi at your event? Great! if you don't, that's ok, we offer Offline mode

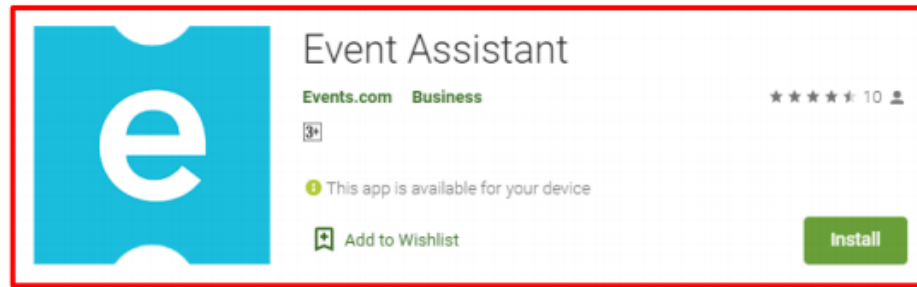
Source: <https://events.com/on-site-check-in/>



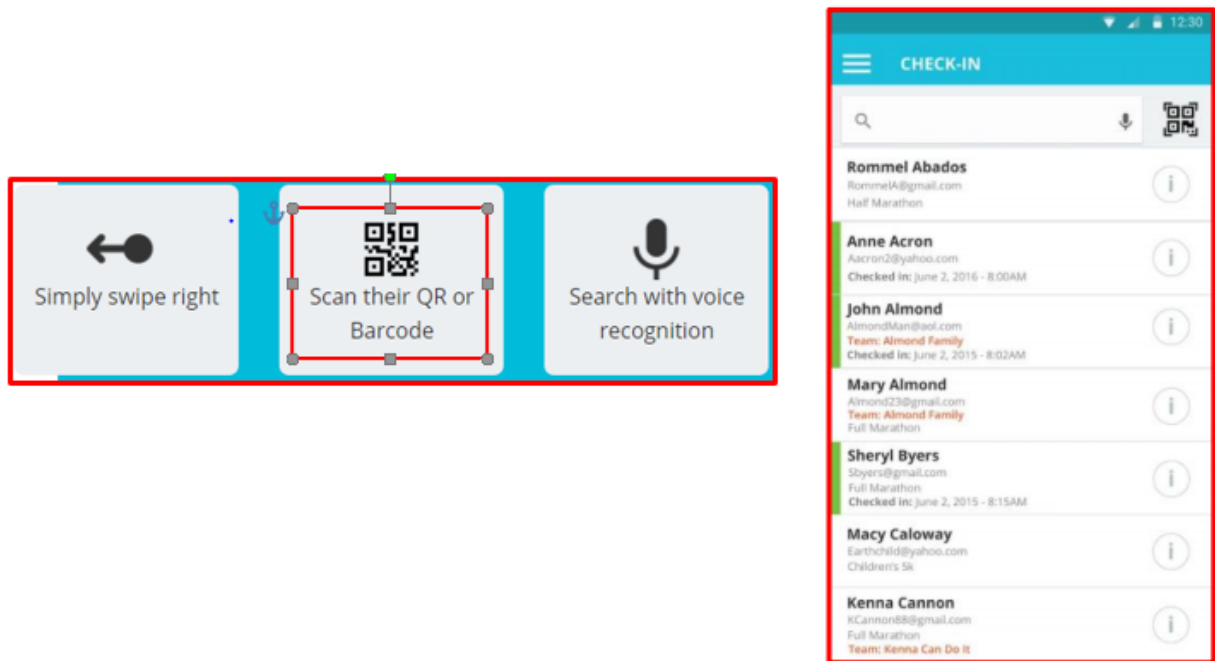
Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>

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

1 in connection with other allegations herein.



7 Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>



18 Source: <https://events.com/on-site-check-in/>

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About Events.com

21 Events.com is a cloud-based suite of event management
22 applications that enables businesses of all sizes to manage
23 sponsors, inventory, proposals, agreements and more. Key
24 features include event creation, guest management, payment
25 processing, reporting and analytics.

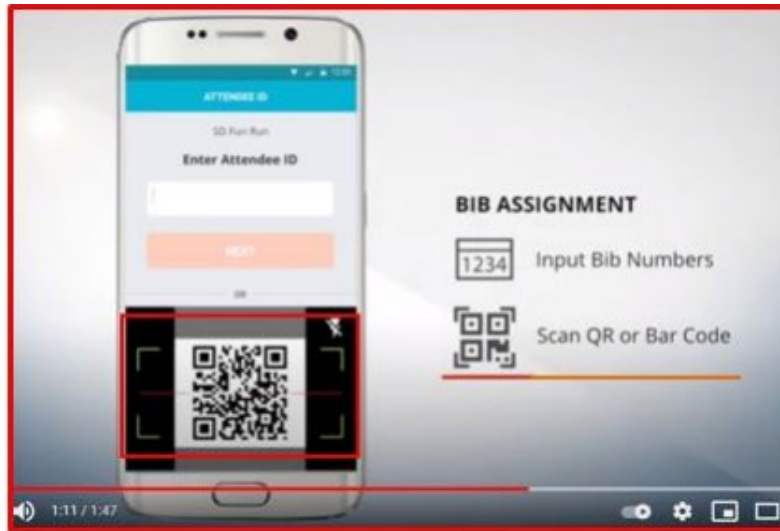
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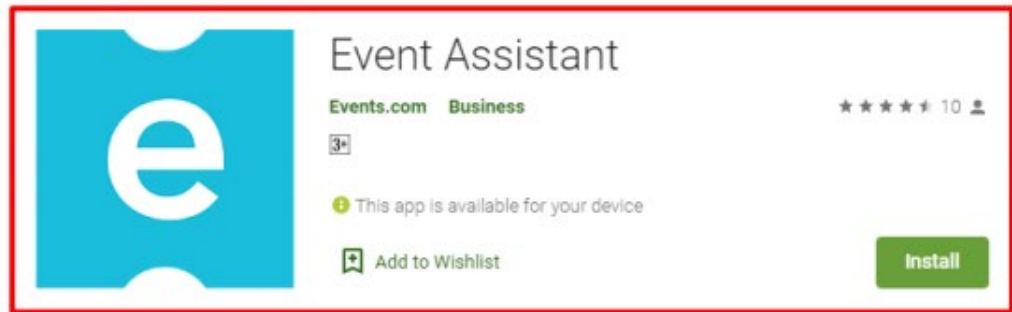
28 Source: <https://www.softwareadvice.com/event-management/events-profile/>

1 24. The Product uses a signal processing device and a visual input device,
2 the visual input device affixed within the portable handheld housing. For example, a
3 visual input device (e.g., camera for scanning barcode) and signal processing device
4 (i.e., processor of handheld device) are affixed within the portable handheld housing
5 (e.g., the housing of the mobile device). The mobile device camera is used to scan a
6 code and, via the Product’s server, obtain details related to a particular product (e.g.,
7 details about the ticket and event associated with the ticket). Certain aspects of this
8 element are illustrated in the screenshots below and/or those provided in connection
9 with other allegations herein.
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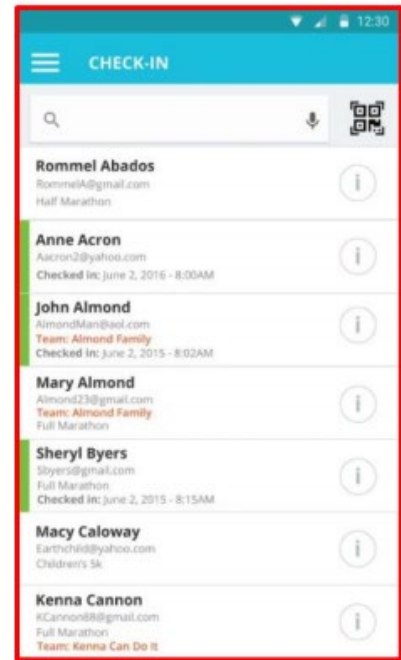
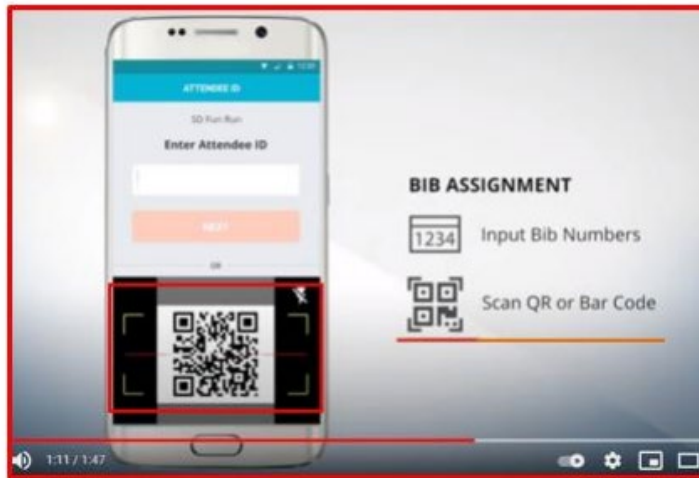


Source: https://www.youtube.com/watch?v=SyR_IBuhyec&feature=emb_title



Source: <https://play.google.com/store/apps/details?id=com.events.eventsassp&hl=en>

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.



Source: https://www.youtube.com/watch?v=SyR_1Buhyec&feature=emb_title

Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>

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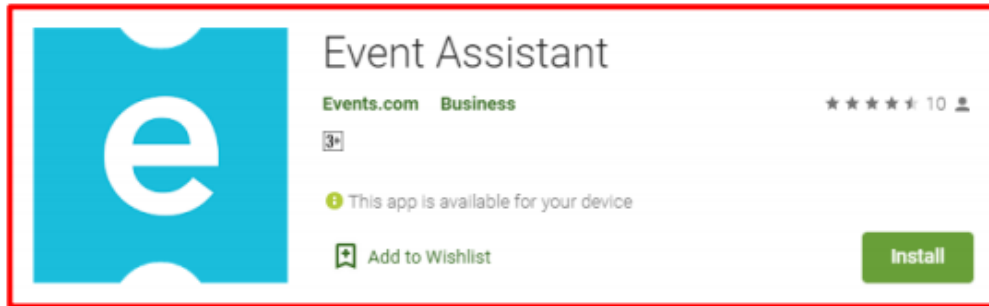
26. The Product also includes a server in communication with the communication network, the server comprising a server database configured to store a look-up table that includes at least a plurality of bar codes associated with a plurality of articles of commerce. For example, the Product app communicates with a server through the communication network. The server has a look-up table (i.e., guestlist which has associated guest details for a particular event). Also, the server database contains codes, each having associated information about the guest list. 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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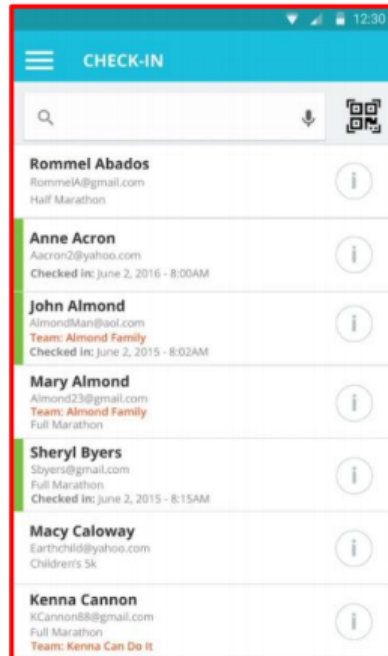
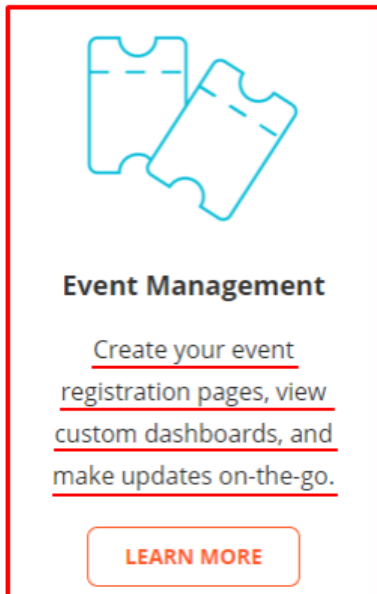
About Events.com

Events.com is a cloud-based suite of event management applications that enables businesses of all sizes to manage sponsors, inventory, proposals, agreements and more. Key features include event creation, guest management, payment processing, reporting and analytics.

Source: <https://www.softwareadvice.com/event-management/events-profile/>



Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>




Source: <https://events.com/>

Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>

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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.

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Event Management

Create your event
registration pages, view
custom dashboards, and
make updates on-the-go.

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CHECK-IN

Rommel Abados
RommeIA@gmail.com
Half Marathon

Anne Acron
Aacron2@yahoo.com
Checked in: June 2, 2016 - 8:00AM

John Almond
AlmondMan@aol.com
Team: Almond Family
Checked in: June 2, 2015 - 8:02AM

Mary Almond
Almond23@gmail.com
Team: Almond Family
Full Marathon

Sheryl Byers
Sbyers@gmail.com
Full Marathon
Checked in: June 2, 2015 - 8:15AM

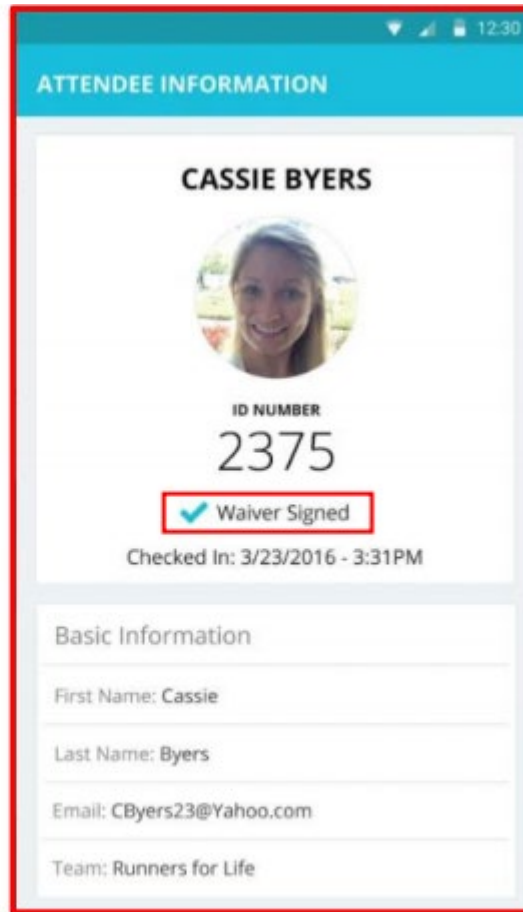
Macy Caloway
Earthchild@yahoo.com
Children's 5k

Kenna Cannon
KCannon88@gmail.com
Full Marathon
Team: Kenna Can Do It

Source: <https://events.com/>

Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>

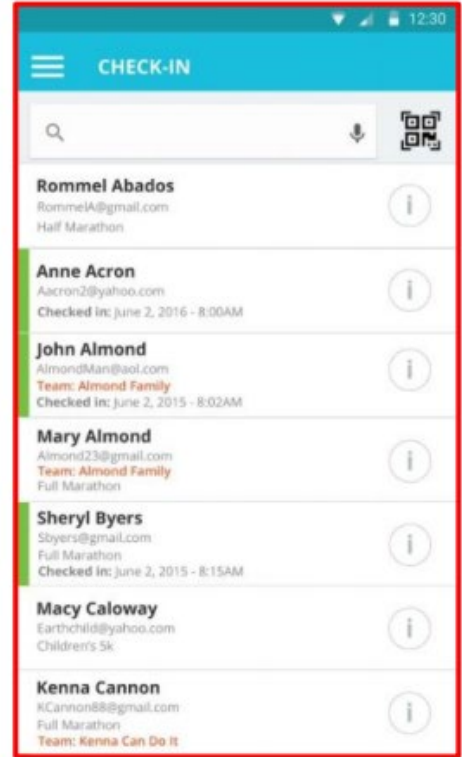
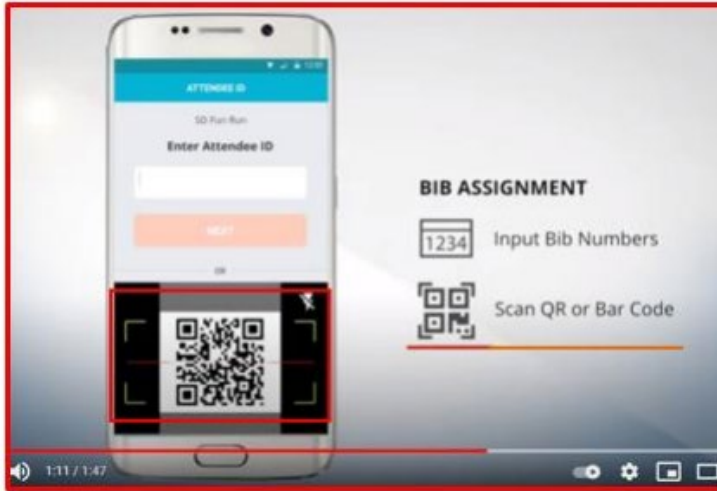
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Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>

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 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 indicating the existence or absence of a link to information about a respective article of commerce (e.g., link indicating validation of scanned QR code ticket and details associated with ticket). The information associated with the link is retrieved through the communication network. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other

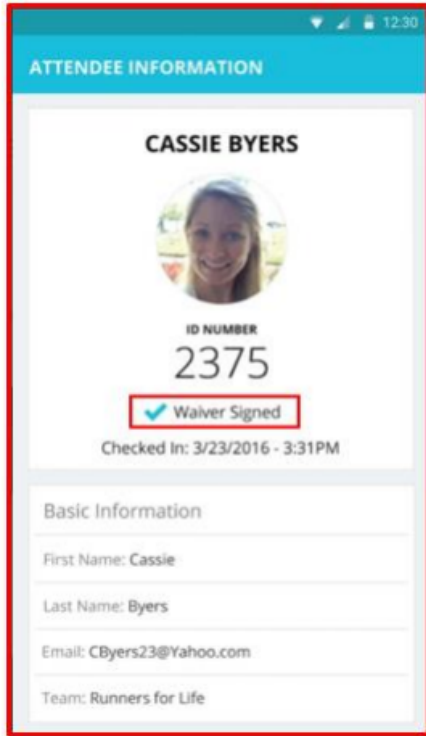
1 allegations herein.



17 Source: https://www.youtube.com/watch?v=SyR_1Buhyc&feature=emb_title

18 Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>

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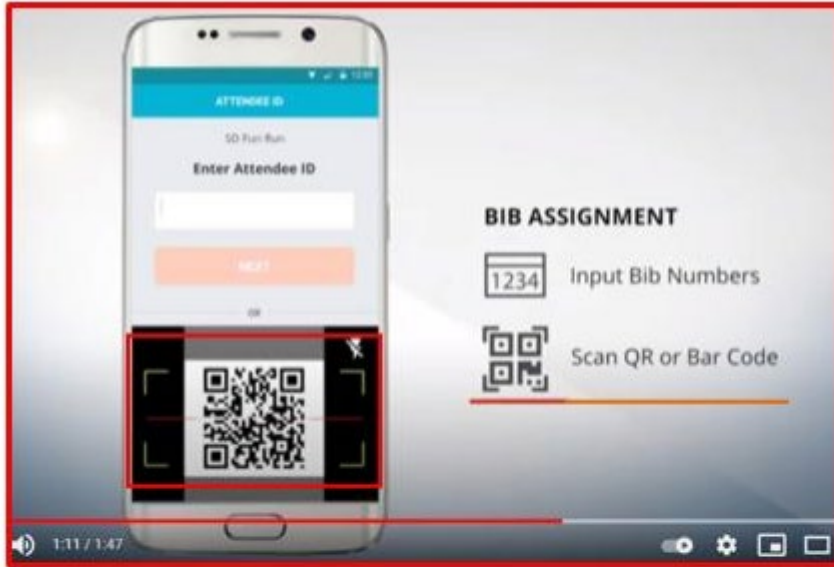


About Events.com

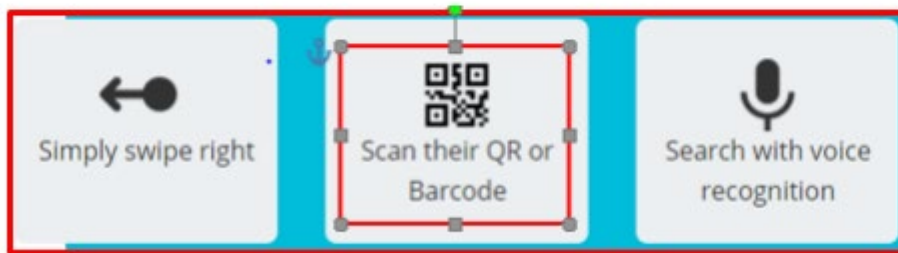
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Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>
Source: <https://www.softwareadvice.com/event-management/events-profile/>

29. The visual input device is configured to scan an image of an article of commerce, decode the image to obtain a 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 code 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.



Source: https://www.youtube.com/watch?v=SyR_1Buhyec&feature=emb_title

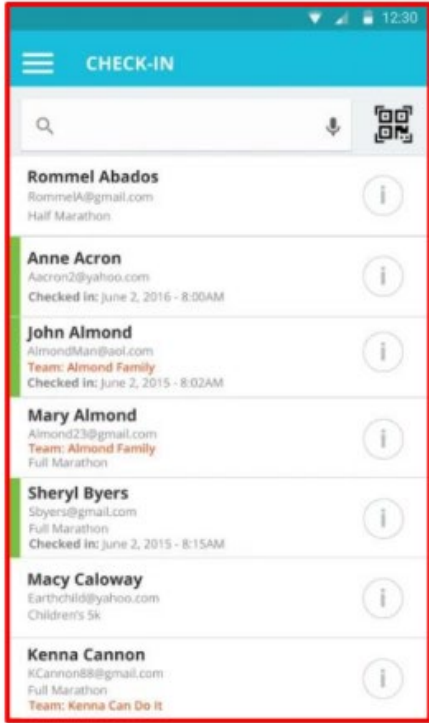


Source: <https://events.com/on-site-check-in/>

30. 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 to ticket/event information) whether or not information pertaining to an article of commerce associated with the code (information about the associated ticket/event) 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.youtube.com/watch?v=SyR_I1Buhyc&feature=emb_title
Source: <https://play.google.com/store/apps/details?id=com.events.eventsapp&hl=en>

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

32. 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.

33. 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: March 2, 2021

Respectfully submitted,

/s/ Stephen M. Lobbin
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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***