

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RIGGS TECHNOLOGY)	
HOLDINGS, LLC,)	
Plaintiff,)	
)	Civil Action No. 3:21-cv-00733
v.)	
)	
SALESFORCE.COM, INC.)	JURY TRIAL DEMANDED
Defendant.)	

**PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT
INFRINGEMENT**

Riggs Technology Holdings, LLC (“Riggs”) files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 7,299,067 (“the ‘067 patent”) (referred to as the “Patent-in-Suit”) by Salesforce.com, Inc. (“Salesforce”).

I. THE PARTIES

1. Plaintiff Riggs is a Texas Limited Liability Company with its principal place of business located in Harris County, Texas.

2. On information and belief, Salesforce is a corporation existing under the laws of the State of Delaware, with a principal place of business located at 2300 Field Street, Dallas, Texas 75201. On information and belief, Salesforce sells and offers to sell products and services throughout Texas, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in Texas

and this judicial district. Salesforce may be served through their registered agent C T Corporation System, at 1999 Bryan St., Ste 900, Dallas, Texas 75201.

II. JURISDICTION AND VENUE

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271, et. seq.

4. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Texas and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of Texas and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this judicial district.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in Texas and this District.

III. INFRINGEMENT


A. Infringement of the '067 Patent

6. On November 20, 2007, U.S. Patent No. 7,299,067 (“the ‘067 patent”, attached as Exhibit A) entitled “Methods and Systems for Managing the Provision of Training Provided Remotely Through Electronic Data Networks to Users of Remote Electronic Devices” was duly and legally issued by the U.S. Patent and Trademark Office. Riggs owns the ‘067 patent by assignment.

7. The ‘067 patent relates to a novel and improved methods and systems for providing and managing training remotely.

8. Salesforce maintains, operates, and administers online and software based training platforms, products and services that facilitate remote training that infringes one or more claims of the ‘067 patent, including one or more of claims 1-18, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘067 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

9. Support for the allegations of infringement may be found in the following preliminary table:

US7299067 B2	SalesForce Training
<p>1. A method of managing training completed remotely at a hand held device, said method comprising the step of:</p>	 <p data-bbox="1016 279 1302 348">1 800 761 7382</p> <p data-bbox="1333 302 1373 331">☰</p> <h1 data-bbox="599 438 1276 594">DIGITAL LEARNING SOLUTIONS</h1> <p data-bbox="646 625 1240 741">Transform your organization's in-person training into powerful online and on-demand experiences.</p> <p data-bbox="477 848 1373 890">© 2019 - SalesForce Training - All rights reserved</p> <p data-bbox="477 896 1205 926">https://www.salesforcetraining.com/digital-learning-solutions/</p> <p data-bbox="477 955 1399 1016">SalesForce Training has a method of managing training completed remotely at a hand held device.</p> <p data-bbox="477 1050 1399 1106">The reference includes subject matter disclosed by the claims of the patent after the priority date.</p>

US7299067 B2	SalesForce Training
<p>receiving at a training server training data transmitted to the training server through a data network from a user of a hand held device, the training data representing training taken by the user at hand held device;</p>	<p data-bbox="526 1241 1357 1528">Salesforce is further reducing barriers to learning with the launch of <u>Trailhead GO: the free, first-ever mobile app for Trailhead, exclusive to iOS and iPadOS</u> as part of our strategic partnership with Apple. Now Trailblazers can skill up on the go with over 700 modules covering business, technical and soft skills that unlock a world of career opportunities both within the Salesforce ecosystem and beyond.</p> <p data-bbox="477 1551 1357 1640">https://www.salesforce.com/news/stories/skill-up-anywhere-for-the-jobs-of-tomorrow-introducing-trailhead-go-the-mobile-app-for-trailhead-exclusive-to-iphone-and-ipad/</p> <p data-bbox="477 1673 1390 1759">The reference describes receiving at a training server training data transmitted to the training server through a data network from a user of a hand held device, the training data representing training taken by the user at hand held device.</p>

US7299067 B2	SalesForce Training
<p>receiving identifying information for the user of a hand held device concurrently with the training data file;</p> <p>identifying the user of the hand held device;</p>	<p>Log into Trailhead, click on your avatar in the upper-right, and select Settings. Under the Privacy section, toggle the "Public Profile" button to the option you want.</p> <ul style="list-style-type: none">• "Public" means that <u>other Trailblazers can see your certifications, community activity, badges, points, avatar, and about me information that you've selected.</u>• "Private" means your profile is completely private and a link to your profile would only show your name, avatar, and a "This profile is private" message. <p>Learn more about Your Privacy on Trailblazer.me.</p> <p>https://trailhead.salesforce.com/help?article=Trailhead-Profile-Overview&topic=Trailhead_Mobile_App&topicName=Trailhead%20Mobile%20App&groupName=Trailhead_Support</p> <p>The reference describes receiving identifying information for the user of a hand held device concurrently with the training data file.</p> <p>The reference describes identifying the user of the hand held device.</p>

US7299067 B2

SalesForce Training

authenticating the identify of the user of the hand held device by requesting authentication data from the user and comparing the authentication data with a master user identification template containing authentication data associated with the user and accessible by the training server to determine if said comparison authenticates the user's identify as an authorized trainee;

How do I log in/ sign up for Trailhead GO?

Log in

To log in to Trailhead GO, log in the same way you would log in on the web. You will have the following options: Salesforce, Google, LinkedIn, and email.

Can't log in?

If you're having trouble logging in, click on **Can't log in?** and enter your email. A one-time password will be sent to your email, and you will be prompted to enter the one-time password on the next screen.

Check out our article [Sign Up and Log In to Trailhead Using a One-Time Password](#) to learn about one-time passwords.

[<https://trailhead.salesforce.com/help?article=Trailhead-GO-for-Android-FAQ>](https://trailhead.salesforce.com/help?article=Trailhead-GO-for-Android-FAQ)

The reference describes authenticating the identify of the user of the hand held device by requesting authentication data from the user and comparing the authentication data with a master user identification template containing authentication data associated with the user and accessible by the training server to determine if said comparison authenticates the user's identify as an authorized trainee.

US7299067 B2	SalesForce Training		
recording the training data in memory associated with the training server;	What can I do with Trailhead GO for Android?		
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US7299067 B2	SalesForce Training																
<p>locating at least one training file contained within the training data;</p> <p>determining status of the training file by comparing the training file with an associated master training template accessible from memory by the training server, the status including a determination if training represented by the training file meets a set criterion including at least one of: pending, incomplete, failed, passed; and</p> <p>recording training status in memory.</p>	<p>What can I do with Trailhead GO for Android?</p> <table border="1"> <tr> <td data-bbox="518 296 761 380">Log in</td> <td data-bbox="761 296 1349 380">Log into Trailhead with Salesforce, Google, LinkedIn, and email.</td> </tr> <tr> <td data-bbox="518 380 761 464">Sign up</td> <td data-bbox="761 380 1349 464">Create a Trailhead account with Salesforce, Google, LinkedIn, and email.</td> </tr> <tr> <td data-bbox="518 464 761 548">Learn</td> <td data-bbox="761 464 1349 548">Read all public content for modules, projects, and trails.</td> </tr> <tr> <td data-bbox="518 548 761 632">Earn badges</td> <td data-bbox="761 548 1349 632">Log in to Trailhead to complete modules with quizzes and earn badges.</td> </tr> <tr> <td data-bbox="518 632 761 800">Recommendations</td> <td data-bbox="761 632 1349 800"> <p><u>Trailhead GO features next badge recommendations powered by Einstein.</u></p> <p><u>Trailhead GO will recommend badges on the Today tab and after you earn a badge.</u></p> </td> </tr> <tr> <td data-bbox="518 800 761 884">Search</td> <td data-bbox="761 800 1349 884">To search, click on the Search icon and enter the name of the trail, module, or project.</td> </tr> <tr> <td data-bbox="518 884 761 1094">Filter</td> <td data-bbox="761 884 1349 1094">To filter, click on the Learn tab, and select the arrow for Trails, Modules, Projects, or Trailmixes. Then, click the filter symbol on the top right corner of the screen. You can then filter by Role, Level, Product, or Skill.</td> </tr> <tr> <td data-bbox="518 1094 761 1178">Track Progress</td> <td data-bbox="761 1094 1349 1178">Track your in-progress learning across Trailhead GO and Trailhead web.</td> </tr> </table> <p>https://trailhead.salesforce.com/help?article=Trailhead-GO-for-Android-FAQ</p> <p>The reference describes locating at least one training file contained within the training data.</p> <p>The reference describes determining status of the training file by comparing the training file with an associated master training template accessible from memory by the training server, the status including a determination if training represented by the training file meets a set criterion including at least one of: pending, incomplete, failed, passed.</p> <p>The reference describes recording training status in memory.</p>	Log in	Log into Trailhead with Salesforce, Google, LinkedIn, and email.	Sign up	Create a Trailhead account with Salesforce, Google, LinkedIn, and email.	Learn	Read all public content for modules, projects, and trails.	Earn badges	Log in to Trailhead to complete modules with quizzes and earn badges.	Recommendations	<p><u>Trailhead GO features next badge recommendations powered by Einstein.</u></p> <p><u>Trailhead GO will recommend badges on the Today tab and after you earn a badge.</u></p>	Search	To search, click on the Search icon and enter the name of the trail, module, or project.	Filter	To filter, click on the Learn tab, and select the arrow for Trails, Modules, Projects, or Trailmixes. Then, click the filter symbol on the top right corner of the screen. You can then filter by Role, Level, Product, or Skill.	Track Progress	Track your in-progress learning across Trailhead GO and Trailhead web.
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These allegations of infringement are preliminary and are therefore subject to change.

10. Salesforce has and continues to induce infringement. Salesforce has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and

continues to do so, on how to use its products and services (e.g., payment products and services that facilitate purchases from a vendor using a bridge computer) such as to cause infringement of one or more of claims 1–18 of the ‘067 patent, literally or under the doctrine of equivalents. Moreover, Salesforce has known or should have known of the ‘067 patent and the technology underlying it from at least the date of issuance of the patent.

11. Salesforce has and continues to contributorily infringe. Salesforce has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., payment products and services that facilitate purchases from a vendor using a bridge computer) and related services such as to cause infringement of one or more of claims 1–18 of the ‘067 patent, literally or under the doctrine of equivalents. Moreover, Salesforce has known or should have known of the ‘067 patent and the technology underlying it from at least the date of issuance of the patent.

12. Salesforce has caused and will continue to cause RIGGS damage by direct and indirect infringement of (including inducing infringement of) the claims of the ‘067 patent.

IV. JURY DEMAND

RIGGS hereby requests a trial by jury on issues so triable by right.

V. PRAYER FOR RELIEF

WHEREFORE, RIGGS prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the ‘067 patent through Salesforce payment links;
- b. award RIGGS damages in an amount sufficient to compensate it for Defendant’s infringement of the ‘067 patent in an amount no less than a reasonable royalty or lost

profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;

- c. award RIGGS an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- d. declare this case to be “exceptional” under 35 U.S.C. § 285 and award RIGGS its attorneys’ fees, expenses, and costs incurred in this action;
- e. declare Defendant’s infringement to be willful and treble the damages, including attorneys’ fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award RIGGS such other and further relief as this Court deems just and proper.

Respectfully submitted,

Ramey & Schwaller, LLP

A handwritten signature in black ink, appearing to read 'WPR', with a large, loopy flourish underneath.

William P. Ramey, III
Texas State Bar No. 24027643
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
(713) 426-3923 (telephone)
(832) 900-4941 (fax)
wramey@rameyfirm.com

Jeffrey E. Kubiak (pro hac pending)
Texas State Bar No. 24028470
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
(713) 426-3923 (telephone)
(832) 900-4941 (fax)
jkubiak@rameyfirm.com

Attorneys for Riggs Technology Holdings, LLC