

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

AUTHWALLET, LLC)	
Plaintiff,)	
)	Civil Action No. 6:21-cv-01123-ADA
v.)	
)	
STARBUCKS CORPORATION)	JURY TRIAL DEMANDED
Defendant.)	

**PLAINTIFF’S FIRST AMENDED COMPLAINT FOR PATENT
INFRINGEMENT**

AuthWallet, LLC (“AuthWallet”) files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,292,852 (“the ‘852 patent”) (referred to as the “Patent-in-Suit”) by Starbucks Corporation, (“Starbucks”).

I. THE PARTIES

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

2. On information and belief, Starbucks is a corporation existing under the laws of the State of Washington, with a principal place of business located at 2609 S Jack Kultgen Expy, Waco, TX 76711. On information and belief, Starbucks 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. Starbucks may be served through their registered agent Corporation Service Company dba Lawyers incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

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 '852 Patent

6. On March 22, 2016, U.S. Patent No. 9,292,852 (“the ‘852 patent”, attached as Exhibit A) entitled “System And Method For Applying Stored Value To A Financial Transaction” was duly and legally issued by the U.S. Patent and Trademark Office. AuthWallet owns the ‘852 patent by assignment.

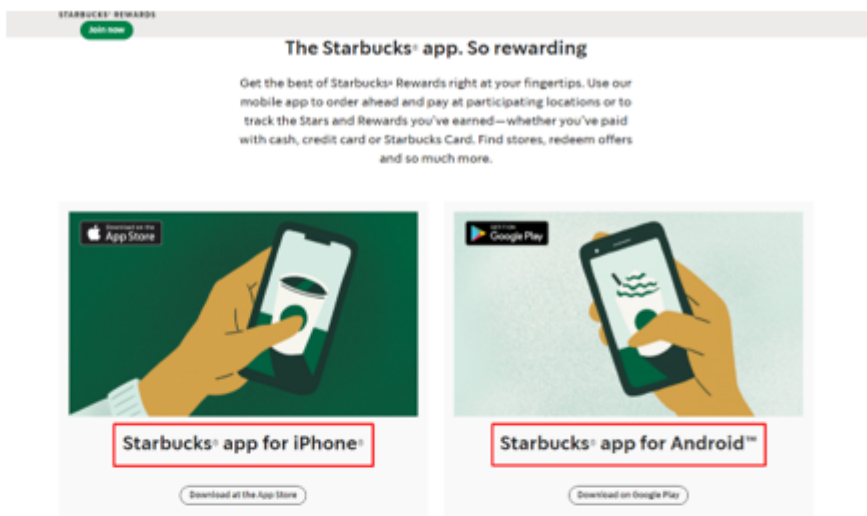
7. The ‘852 patent relates to novel and improved methods and systems for processing financial transaction data.

8. Starbucks maintains, operates, and administers online platforms, products and services that facilitate financial transaction data processing that infringes one or more claims of the ‘852 patent, including one or more of claims 1-40, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘852 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:

Claim	Analysis
<p>[1.1] A computer-implemented method for processing financial transaction data in a computing system including a processor and a storage area, the method comprising:</p>	<p>To the extent the preamble is limiting, Starbucks Coffee Company performs and induces others to perform a computer-implemented method for processing financial transaction data in a computing system including a processor and a storage area.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Starbucks Coffee Company provides stores and online platforms (Starbucks.com and Starbucks mobile application) that allow its users to buy products (“processing financial transaction data”) such as coffee, and food. Starbucks utilizes servers (“computing system”) that comprise storage areas (such as memory systems) to serve customers’ purchase requests.</p>  <p>Source: https://www.starbucks.com/</p> 

Source: <https://www.starbucks.com/menu>



The Starbucks® app. So rewarding

Get the best of Starbucks® Rewards right at your fingertips. Use our mobile app to order ahead and pay at participating locations or to track the Stars and Rewards you've earned—whether you've paid with cash, credit card or Starbucks Card. Find stores, redeem offers and so much more.

Download on the App Store

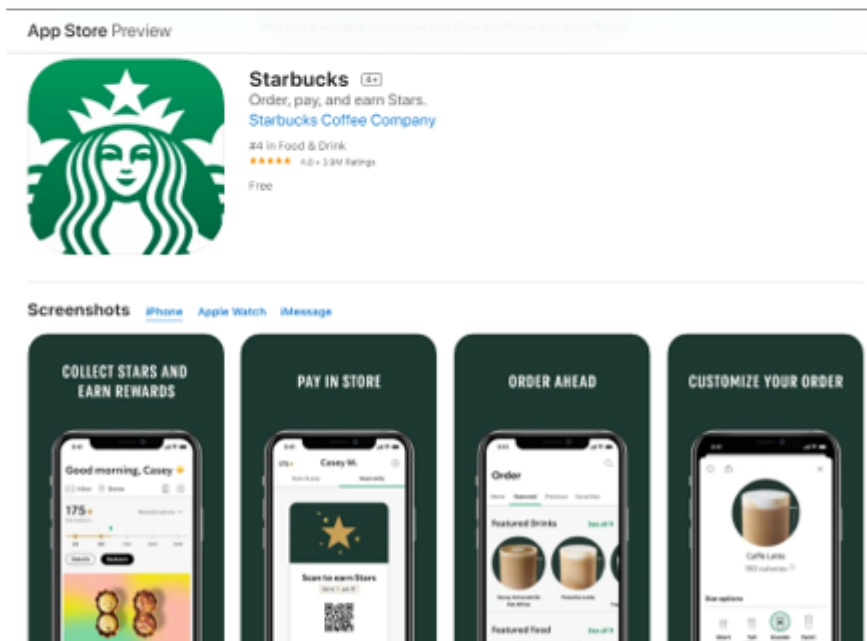
Starbucks® app for iPhone®

Download on Google Play

Starbucks® app for Android™

Download on Google Play

Source: <https://www.starbucks.com/rewards/mobile-apps>



App Store Preview

Starbucks

Order, pay, and earn Stars.
Starbucks Coffee Company

#4 in Food & Drink
4.3 - 3.9M Ratings
Free

Screenshots

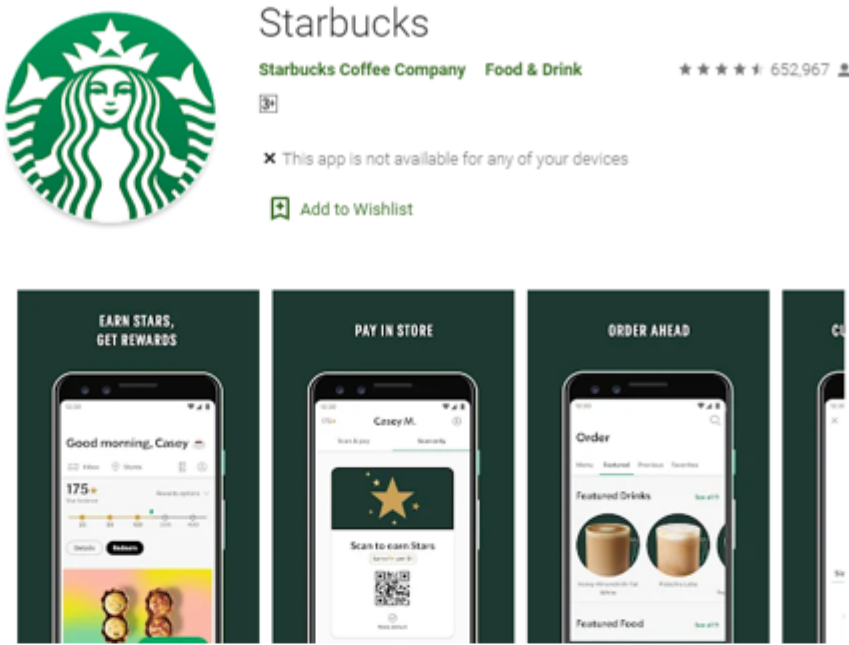
COLLECT STARS AND EARN REWARDS

PAY IN STORE

ORDER AHEAD

CUSTOMIZE YOUR ORDER

Source: https://apps.apple.com/us/app/starbucks/id331177714?branch_match_id=763628050811926070&utm_source=Web&utm_medium=marketing

	 <p>Source: https://play.google.com/store/apps/details?id=com.starbucks.mobilecard&hl=en&branch_match_id=763628050811926070&utm_source=Web&utm_medium=marketing</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.2] receiving an authorization request generated as a result of a transaction by a purchaser at a point of purchase via an acquirer configured to receive authorization requests from a plurality of points of purchase, wherein the authorization request includes a purchaser identifier and transaction information, the transaction information including a transaction amount,</p>	<p>Starbucks Coffee Company performs and induces others to perform the step of receiving an authorization request generated as a result of a transaction by a purchaser at a point of purchase via an acquirer configured to receive authorization requests from a plurality of points of purchase, wherein the authorization request includes a purchaser identifier and transaction information, the transaction information including a transaction amount, and wherein the purchaser identifier identifies the purchaser that initiated the transaction.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when a user purchases an item (such as a cup of coffee) (“transaction by a purchaser”) from the Starbucks stores and/or online platforms (“point of purchase”), an authorization request is sent to an acquirer (such as a bank or a payment gateway). The authorization request comprises a user identification (“purchaser identifier”) including but not limited to information related to the Starbucks Card, Starbucks Rewards Visa Card associated with the user, mobile number, and/or email address and transaction information including but not limited to total transaction amount and/or the items being purchased.</p>

and wherein the purchaser identifier identifies the purchaser that initiated the transaction;

Welcome

As a member you'll collect Stars on almost everything you buy, and those Stars add up to (some really delicious) Rewards. Look out for some surprises and members-only extras.



Order & pay

Select the "Scan in store" button to use your digital Starbucks Card at the register. Or order ahead for pickup. Download the Starbucks® app for even more payment options.

Source: <https://app.starbucks.com/account/rewards/how-it-works>

EARNING STARS

The Rewards that are available to you through Starbucks Rewards are based on the number of Stars that you earn. You can earn Stars by making purchases at participating Starbucks stores in the United States, Canada, Puerto Rico, the United Kingdom and Ireland in the following ways:

1. **Paying for your purchase with a Starbucks Card.** When you pay with your digital Starbucks Card in the App, you will earn **2 (two) Stars for every \$1 (one) U.S. Dollar** you spend at participating stores. You will also earn **2 Stars for every \$1 (one) U.S. Dollar spent when you a) pay in-person at a participating store with your registered physical Starbucks Card or b) scan the barcode in the App, and then use any physical Starbucks Card (regardless of whether it is registered) to complete the purchase.** If you are a Starbucks partner (i.e., employee), you will earn **3 (three) Stars for every \$1 (one) U.S. Dollar** spent using a Starbucks Card so long as you also have your "partner" Starbucks Card registered to your account and scan your barcode in the App or physical "partner" Card prior to your purchase.

Source: <https://www.starbucks.com/rewards/terms>

Earn 4,500 Bonus Stars

With the Starbucks® Rewards Visa® Card, you're earning Stars everywhere you go – including **4,500 Bonus Stars** after you spend \$500 in the first 3 months from account opening.* Plus, enjoy a **\$0 intro annual fee (\$49 after the first year).**†

As a cardmember you'll be enrolled in Starbucks® Rewards. Already a member? No problem, your account will be linked to your new Card upon approval.

Source: <https://www.starbucks.com/starbucks-rewards/credit-card?cell=6j8f&spid=ggqv#offer-details>


All the ways to earn Stars—and Starbucks favorites
The Stars you earn are yours to keep—they won't expire, an exclusive Starbucks benefit for cardmembers.*

EARN THE MOST AT STARBUCKS
 Earn up to 3 Stars per \$1 spent at Starbucks® stores.
1 Star per \$1 when digitally loading your Starbucks Card with your Starbucks Rewards Visa® Card (excludes money added at the register), plus 2 Stars per \$1 spent when that Starbucks Card is used to pay at Starbucks stores.*

EARN ON THE GO
 Earn 1 Star per \$2 spent*
At grocery stores, on local transit and commuting, and on internet, cable and phone services.*

EARN EVERYWHERE ELSE
 Earn 1 Star per \$4 you spend everywhere else.*
Concert tickets, new shoes, charitable giving or anywhere else you choose to spend with your card.

Source: <https://www.starbucks.com/starbucks-rewards/credit-card?cell=6j8f&spid=ggqv#offer-details>



**Step 4
Place your order**

Review order (1)
 Pickup store: Metropolitan Park East
 Prep time: 2 - 4 min

Iced Caffe Americano \$3.45
Grande 16 fl oz
 100% Arabica

YOU MAY ALSO LIKE
 Bacon, Cheddar & Egg Sandwich | Breakfast-Pak Turkey Bacon & | Bacon & Cheddar Sandwich

Subtotal: \$3.80

Source: <https://www.youtube.com/watch?v=5JPZOZPMn18>, 0:35

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

[1.3] based on the authorization request, determining one or more stored value items to apply to the transaction, wherein each stored value item includes an associated value,

Starbucks Coffee Company performs and induces others to perform the step of based on the authorization request, determining one or more stored value items to apply to the transaction, wherein each stored value item includes an associated value, wherein the one or more stored value items are selected from a plurality of stored value items stored in the storage area, and wherein the plurality of stored value items includes stored value items provided by a plurality of different third parties.

wherein the one or more stored value items are selected from a plurality of stored value items

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, when a user who is a Starbucks Rewards member makes a purchase in-store or on online platforms (for example, by using the Starbucks Rewards Visa Card, cash and/or debit/credit card), the user's account is credited with Stars ("stored value item"). The user earns 3 Stars

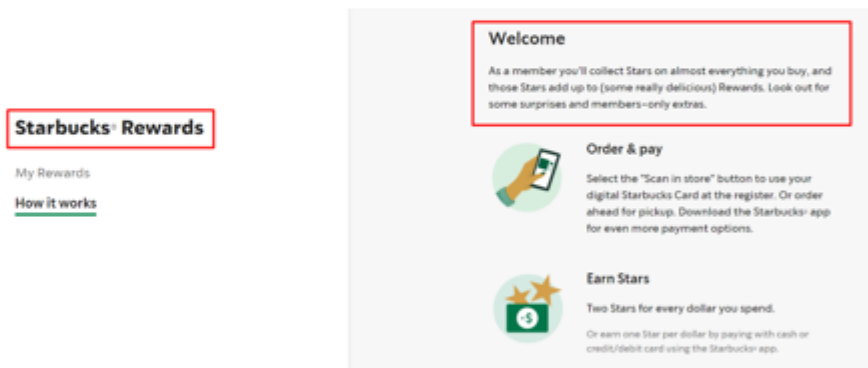
stored in the storage area, and

wherein the plurality of stored value items includes stored value items provided by a plurality of different third parties;

per \$1 spent when digitally loading Starbucks Card with Starbucks Rewards Visa Card or 1 Star per \$2 spent at grocery stores, on local transit and commuting, and on internet and 1 Star per \$4 spent for concert tickets, new shoes. By collecting the Stars, users get rewards such as free food and drinks, each having a currency value (“associated value”).

Further, when the user makes a payment in-store or on online platforms, the user is able to select Stars to make the purchase. Starbucks’s servers store the information regarding the user’s account and the total number of Stars associated with the account.

Further, the Stars are redeemed by making a payment at a third-party store (such as stores where the Starbucks Rewards Visa Card is accepted). When the user makes a payment at a third-party store (using the Starbucks Rewards Visa card), the store informs Starbucks that the purchase was complete and then Starbucks credits the Stars to the user’s account. Hence, upon successful completion of a purchase request at a third-party store, the Stars are credited to the user’s account.



Source: <https://app.starbucks.com/account/rewards/how-it-works>

3

Earn Stars, get Rewards

As you earn Stars, you can redeem them for Rewards —like free food, drinks, and more. Start redeeming with as little as 25 Stars!

Source: <https://www.starbucks.com/rewards>

Earn 4,500 Bonus Stars

With the Starbucks® Rewards Visa® Card, you're earning Stars everywhere you go – including **4,500 Bonus Stars** after you spend \$500 in the first 3 months from account opening.* Plus, enjoy a **\$0 intro annual fee (\$49 after the first year).**†

As a cardmember you'll be enrolled in Starbucks® Rewards. Already a member? No problem, your account will be linked to your new Card upon approval.

Source: <https://www.starbucks.com/starbucks-rewards/credit-card?cell=6j8f&spid=ggqv#offer-details>

EARN THE MOST AT STARBUCKS
Earn up to 3 Stars per \$1 spent at Starbucks® stores.
1 Star per \$1 when digitally loading your Starbucks Card with your Starbucks® Rewards Visa® Card (excludes money added at the register), plus 2 Stars per \$1 spent when that Starbucks Card is used to pay at Starbucks® stores.*

EARN ON THE GO
Earn 1 Star per \$2 spent*
At grocery stores, on local transit and commuting, and on internet, cable and phone services.*

EARN EVERYWHERE ELSE
Earn 1 Star per \$4 you spend everywhere else.*
Concert tickets, new shoes, charitable giving or anywhere else you choose to spend with your card.

Source: <https://www.starbucks.com/starbucks-rewards/credit-card?cell=6j8f&spid=ggqv#offer-details>

STARBUCKS® REWARDS

Cash or card, you earn Stars
No matter how you pay, you can earn Stars with your morning coffee. Those Stars add up to (really delicious) Rewards.

1★ per dollar
Pay as you go

Scan and pay separately
Use cash or credit/debit card at the register.

Save payment in the app
Check-out faster by saving a credit/debit card or PayPal to your account. You'll be able to order ahead or scan and pay at the register in one step.

2★ per dollar
Add funds in the app

Preload
To save time and earn Stars twice as fast, add money to your digital Starbucks Card using any payment option. Scan and pay in one step or order ahead in the app.

Register your gift card
Then use it to pay through the app. You can even consolidate balances from multiple cards in one place.

Source: <https://www.starbucks.com/rewards>

	<p>What can I redeem my Reward for?</p> <p>Published 04/05/2016 02:38 PM Updated 09/03/2021 01:42 PM</p> <p>As a Starbucks® Rewards member, you can redeem Stars at a participating store as soon as you qualify for a Reward tier. After you collect enough Stars for a Reward (25, 50, 150, 200, 400 Stars), you can choose to redeem your Stars for a free beverage customization, drink, food, merchandise (under \$20) or package of coffee before the Stars expire—either choose to redeem your Stars in the Starbucks® app when ordering ahead, or ask your barista when you’re paying at a participating Starbucks store. Once your Stars are redeemed, the corresponding number of Stars will be removed from your Star balance.</p> <ul style="list-style-type: none"> • 25 Stars: Customize your favorite drink with an extra shot, dairy substitute, syrup or sauce (such as mocha sauce.) • 50 Stars: Hot brewed coffee, bakery item or hot brewed tea. • 150 Stars: Handcrafted drink, hot breakfast or parfait. • 200 Stars: Lunch sandwich, protein box or salad (250 Stars in Canada.) • 400 Stars: Select merchandise or packaged coffee. <p>Source: https://customerservice.starbucks.com/app/answers/detail/a_id/3939/~/~/what-can-i-redeem-my-reward-for%3F</p> <p>2. Where can I see the Stars earned through purchases and reloads with my Starbucks Rewards™ Visa® Card?</p> <p>You may view eligible transactions and corresponding Stars earned after signing into your account on Chase.com . The Stars will be added to your Starbucks account at the end of your monthly...</p> <p>Date Updated: 09/13/2021</p> <p>Source: https://customerservice.starbucks.com/app/answers/list/session/L3RpbWUvMTYzMTY5NTA0NC9nZW4vMTYzMTY5NTA0NC9zaWQvZlUxb2ZwcTVyb3M0NDJlc0t1bDRQcDdUR1RFOU9EUXd3aXFVcHBSclhDa2N2Q1dxWtN2RF9aaHNweCU3RWRQN2xVbXczU3prT2ZPakhJYks4SnU0dk5jZE4lN0VUOUZDRWNOR0J6aCU3RXV1bll3RmVNZDNfV2VCbG5kRVJBjTlXp/887</p> <p>described in the terms of the Rewards Program Agreement. Rewards Categories: Merchants who accept Visa/Mastercard credit cards are assigned a merchant code, which is determined by the merchant or its processor in accordance with Visa/Mastercard procedures based on the kinds of products and services they primarily sell. We group similar merchant codes into categories for purposes of making rewards offers to you. Please note: We make every effort to include all relevant merchant codes in our rewards categories. However, even though a merchant or some of the items that it sells may appear to fit within a rewards category, the merchant may not have a merchant code in that category. When this occurs, purchases with that merchant won't qualify for rewards offers on purchases in that category. Purchases submitted by you, an authorized user, or the merchant through third-party payment accounts, mobile or wireless card readers, online or mobile digital wallets, or similar technology will not qualify in a rewards category if the technology is not set up to process the purchase in that rewards category. For more information about Chase rewards categories, see chase.com/RewardsCategoryFAQs</p> <p>Source: https://www.starbucks.com/starbucks-rewards/credit-card?cell=6j8f&spid=ggqv#offer-details</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.4] transmitting a transaction indication message to a mobile device associated with the purchaser identifier, wherein the transaction</p>	<p>Starbucks Coffee Company performs and induces others to perform the step of transmitting a transaction indication message to a mobile device associated with the purchaser identifier, wherein the transaction indication message includes information about the determined one or more stored value items.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p>

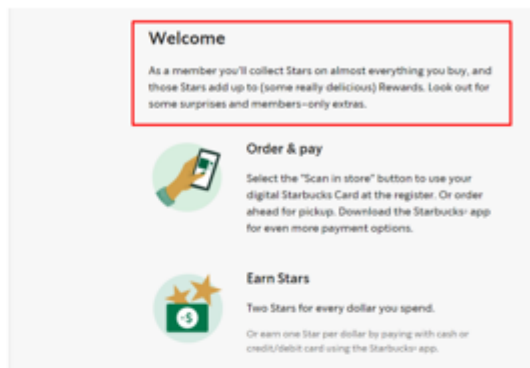
indication message includes information about the determined one or more stored value items;

For example, when a user tries to make a purchase and/or performs a checkout in-store or on online platforms (for example, by using the Starbucks Rewards Visa Card and/or Starbucks Card), Starbucks identifies the user (using at least the membership number, card number, email address, and/or mobile number) and provides information regarding the Stars (“transaction indication message”) issued to the user.

Starbucks Rewards

My Rewards

How it works



Source: <https://app.starbucks.com/account/rewards/how-it-works>

3

Earn Stars, get Rewards

As you earn Stars, you can redeem them for Rewards —like free food, drinks, and more. Start redeeming with as little as 25 Stars!

Source: <https://www.starbucks.com/rewards>

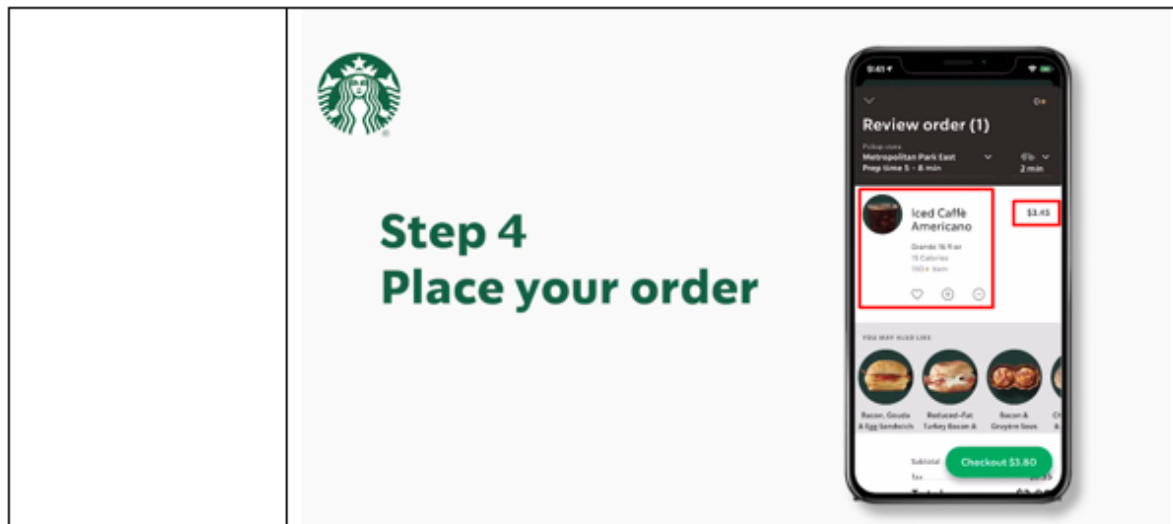
2. Where can I see the Stars earned through purchases and reloads with my Starbucks Rewards™ Visa® Card?

You may view eligible transactions and corresponding Stars earned after signing into your account on Chase.com . The Stars will be added to your Starbucks account at the end of your monthly...

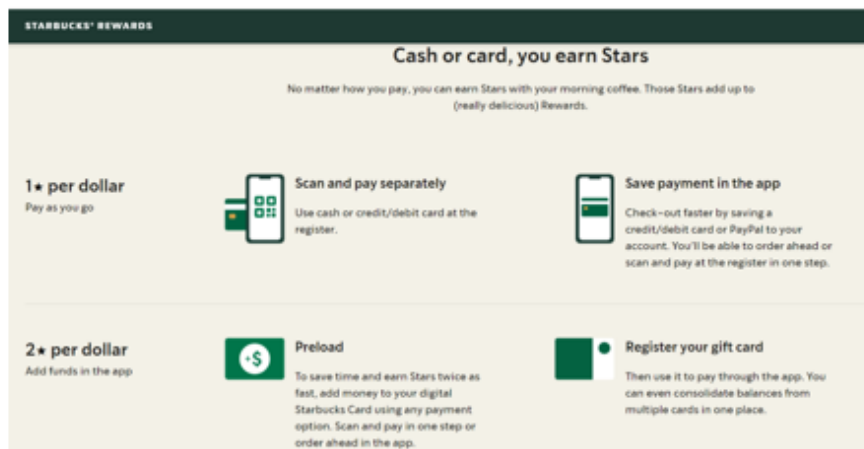
Date Updated: 09/13/2021

Source:

<https://customerservice.starbucks.com/app/answers/list/session/L3RpbWUvMTYzMTY5NTA0NC9nZW4vMTYzMTY5NTA0NC9zaWQvZlUxb2ZwcTVyb3M0NDJlc0t1bDRQcDdUR1RFOU9EUXd3aXFVcHBSclhDa2N2Q1dxWTN2RF9aaHNweCU3RWRQN2xVbXczU3prT2ZPakhJYks4SnU0dk5jZE4lN0VUOUZDRWNOR0J6aCU3RXV1blI3RmVNZDNfV2VCbG5kRVJBjTlXJTlX/p/887>



Source: <https://www.youtube.com/watch?v=5JPZOZPMn18>, 0:35



Source: <https://www.starbucks.com/rewards>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

[1.5] receiving an indication from a user of the mobile device that at least one stored value item should be applied against the transaction;

Starbucks Coffee Company performs and induces others to perform the step of receiving an indication from a user of the mobile device that at least one stored value item should be applied against the transaction.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, during checkout, Starbucks allows a user to use specific amount of Stars from a plurality of issued Stars. Upon selection of Stars, the value of the Stars is applied against the total purchase amount and user can get free food and drinks while making a purchase at Starbucks.


Starbucks Rewards

My Rewards

How it works


Welcome

As a member you'll collect Stars on almost everything you buy, and those Stars add up to (some really delicious) Rewards. Look out for some surprises and members-only extras.



Order & pay

Select the "Scan in store" button to use your digital Starbucks Card at the register. Or order ahead for pickup. Download the Starbucks app for even more payment options.



Earn Stars

Two Stars for every dollar you spend.

Or earn one Star per dollar by paying with cash or credit/debit card using the Starbucks app.

Source: <https://app.starbucks.com/account/rewards/how-it-works>



Earn Stars, get Rewards

As you earn Stars, you can redeem them for Rewards —like free food, drinks, and more. Start redeeming with as little as 25 Stars!

Source: <https://www.starbucks.com/rewards>


What can I redeem my Reward for?

Published 04/05/2016 02:38 PM | Updated 09/03/2021 01:42 PM

As a Starbucks® Rewards member, you can redeem Stars at a participating store as soon as you qualify for a Reward tier. After you collect enough Stars for a Reward (25, 50, 150, 200, 400 Stars), you can choose to redeem your Stars for a free beverage customization, drink, food, merchandise (under \$20) or package of coffee before the Stars expire—either choose to redeem your Stars in the Starbucks® app when ordering ahead, or ask your barista when you're paying at a participating Starbucks store. Once your Stars are redeemed, the corresponding number of Stars will be removed from your Star balance.

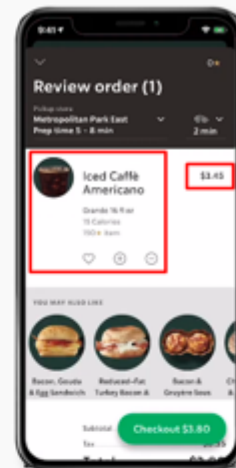
- 25 Stars: Customize your favorite drink with an extra shot, dairy substitute, syrup or sauce (such as mocha sauce.)
- 50 Stars: Hot brewed coffee, bakery item or hot brewed tea.
- 150 Stars: Handcrafted drink, hot breakfast or parfait.
- 200 Stars: Lunch sandwich, protein box or salad (250 Stars in Canada.)
- 400 Stars: Select merchandise or packaged coffee.

Source: https://customerservice.starbucks.com/app/answers/detail/a_id/3939/~/~what-can-i-redeem-my-reward-for%3F

	<p>MULTIPLE TENDER</p> <p>If you use more than one payment method in a single transaction, you will earn Stars based on the earn rate associated with each payment. For example, if your beverage is \$6 and you pay \$3 with your Starbucks Card and \$3 with a credit card, you will earn a total of 9 Stars: 6 Stars for the amount paid with your Starbucks Card, and 3 Stars for the amount paid with your credit card. If members split a transaction, each member must scan their member barcode in the App immediately before making their payment in order to earn Stars for their respective purchase amount.</p> <p>Source: https://www.starbucks.com/rewards/terms</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.6] applying the indicated at least one stored value item to pay a first portion of the transaction amount; and</p>	<p>Starbucks Coffee Company performs and induces others to perform the step of computing at the participating vendor web site a total price for the selected subset of the products and services in units of electronic tokens</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the value of the selected Starbucks Stars is applied against the total purchase amount such that the value of the Stars is subtracted from the total purchase amount (“pay a first portion of the transaction amount”). For example, if a user buys 3 drinks at Starbucks and he has enough Stars to get 1 free drink, then the payment for one drink will be made using the Stars and the user will have to pay only for the remaining 2 drinks.</p> <div style="text-align: center;">  <p>Earn Stars, get Rewards</p> <div style="border: 2px solid red; padding: 10px; margin: 10px auto; width: fit-content;"> <p>As you earn Stars, you can redeem them for Rewards —like free food, drinks, and more. Start redeeming with as little as 25 Stars!</p> </div> <p>Source: https://www.starbucks.com/rewards</p> </div>



Step 4 Place your order



Source: <https://www.youtube.com/watch?v=5JPZOZPMn18>, 0:35

What can I redeem my Reward for?

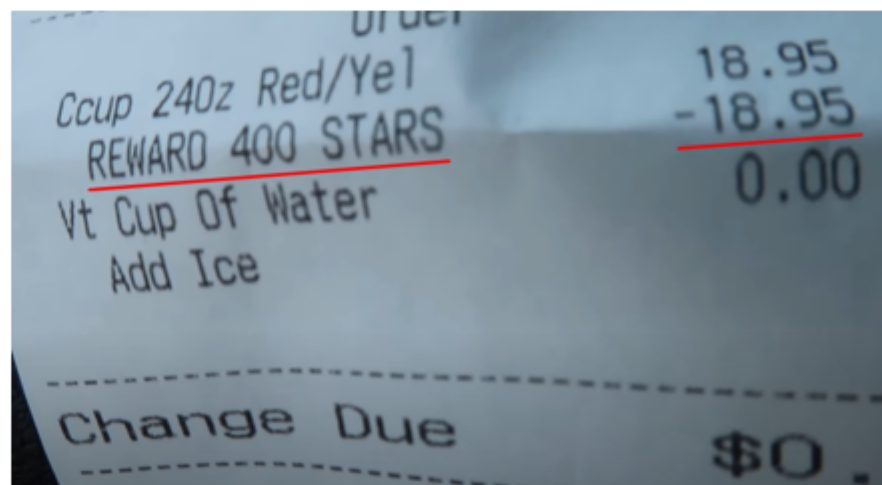
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As a Starbucks® Rewards member, you can redeem Stars at a participating store as soon as you qualify for a Reward tier. After you collect enough Stars for a Reward (25, 50, 150, 200, 400 Stars), you can choose to redeem your Stars for a free beverage customization, drink, food, merchandise (under \$20) or package of coffee before the Stars expire—either choose to redeem your Stars in the Starbucks® app when ordering ahead, or ask your barista when you're paying at a participating Starbucks store. Once your Stars are redeemed, the corresponding number of Stars will be removed from your Star balance.


- 25 Stars: Customize your favorite drink with an extra shot, dairy substitute, syrup or sauce (such as mocha sauce.)
- 50 Stars: Hot brewed coffee, bakery item or hot brewed tea.
- 150 Stars: Handcrafted drink, hot breakfast or parfait.
- 200 Stars: Lunch sandwich, protein box or salad (250 Stars in Canada.)
- 400 Stars: Select merchandise or packaged coffee.

Source:

https://customerservice.starbucks.com/app/answers/detail/a_id/3939/~/~/what-can-i-redeem-my-reward-for%3F



Source: <https://www.youtube.com/watch?v=2CuJxRLncq0>, 7:18

	<p>MULTIPLE TENDER</p> <p>If you use more than one payment method in a single transaction, you will earn Stars based on the earn rate associated with each payment. For example, if your beverage is \$6 and you pay \$3 with your Starbucks Card and \$3 with a credit card, you will earn a total of 9 Stars: 6 Stars for the amount paid with your Starbucks Card, and 3 Stars for the amount paid with your credit card. If members split a transaction, each member must scan their member barcode in the App immediately before making their payment in order to earn Stars for their respective purchase amount.</p> <p>Source: https://www.starbucks.com/rewards/terms</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.7] initiating a payment process to pay a remaining portion of the transaction amount by providing a modified transaction amount to the acquirer for submission to a payment association.</p>	<p>Starbucks Coffee Company performs and induces others to perform the step of authorizing a purchase transaction at the participating vendor web site without requiring any third party authentication and a physical manifestation of the user account</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the remaining total purchase amount to be paid is displayed to the user. When the user checks out, a request for the modified transaction amount is sent to, for example, VISA (“payment association”) for completion of the purchase.</p> <div style="text-align: center;">  <p>Earn Stars, get Rewards</p> <div style="border: 2px solid red; padding: 10px; margin: 10px auto; width: fit-content;"> <p>As you earn Stars, you can redeem them for Rewards —like free food, drinks, and more. Start redeeming with as little as 25 Stars!</p> </div> <p>Source: https://www.starbucks.com/rewards</p> </div>

What can I redeem my Reward for?

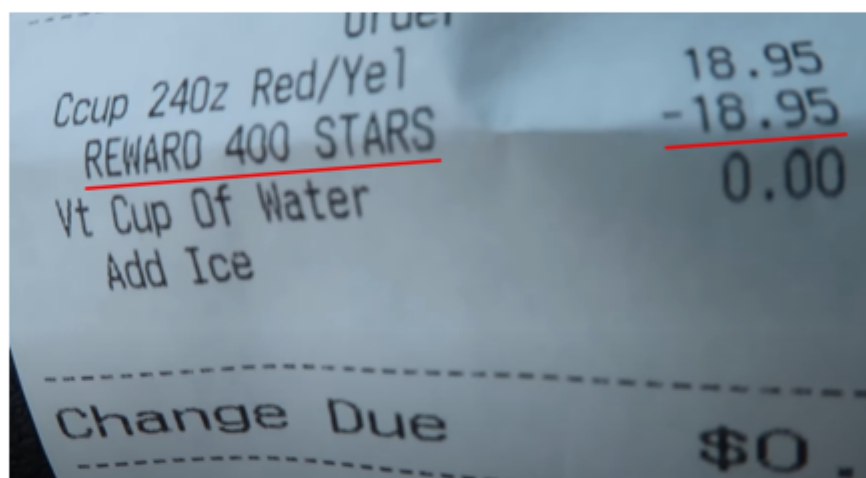
Published 04/05/2016 02:38 PM | Updated 09/03/2021 01:42 PM

As a Starbucks® Rewards member, you can redeem Stars at a participating store as soon as you qualify for a Reward tier. After you collect enough Stars for a Reward (25, 50, 150, 200, 400 Stars), you can choose to redeem your Stars for a free beverage customization, drink, food, merchandise (under \$20) or package of coffee before the Stars expire—either choose to redeem your Stars in the Starbucks® app when ordering ahead, or ask your barista when you're paying at a participating Starbucks store. Once your Stars are redeemed, the corresponding number of Stars will be removed from your Star balance.

- 25 Stars: Customize your favorite drink with an extra shot, dairy substitute, syrup or sauce (such as mocha sauce.)
- 50 Stars: Hot brewed coffee, bakery item or hot brewed tea.
- 150 Stars: Handcrafted drink, hot breakfast or parfait.
- 200 Stars: Lunch sandwich, protein box or salad (250 Stars in Canada.)
- 400 Stars: Select merchandise or packaged coffee.

Source:

https://customerservice.starbucks.com/app/answers/detail/a_id/3939/~/~what-can-i-redeem-my-reward-for%3F



Source: <https://www.youtube.com/watch?v=2CuJxRLncq0>, 7:18

MULTIPLE TENDER

If you use more than one payment method in a single transaction, you will earn Stars based on the earn rate associated with each payment. For example, if your beverage is \$6 and you pay \$3 with your Starbucks Card and \$3 with a credit card, you will earn a total of 9 Stars: 6 Stars for the amount paid with your Starbucks Card, and 3 Stars for the amount paid with your credit card. If members split a transaction, each member must scan their member barcode in the App immediately before making their payment in order to earn Stars for their respective purchase amount.

Source: <https://www.starbucks.com/rewards/terms>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

List of References

1. <https://www.starbucks.com/>, last accessed on September 17, 2021
2. <https://www.starbucks.com/menu>, last accessed on September 17, 2021
3. <https://www.starbucks.com/rewards/mobile-apps>, last accessed on September 17, 2021
4. <https://app.starbucks.com/account/rewards/how-it-works>, last accessed on September 17, 2021
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10. <https://www.starbucks.com/rewards/terms>, last accessed on September 17, 2021
11. <https://customerservice.starbucks.com/app/answers/list/session/L3RpbWUvMTYzMTY5NTA0NC9nZW4vMTYzMTY5NTA0NC9zaWQvZlUxb2ZwcTVyb3M0NDJlc0t1bDRQcDdUR1RFOU9EUXd3aXFVcHBSclhDa2N2Q1dxWTN2RF9aaHNweCU3RWRQN2xVbXczU3prT2ZPakhJYks4SnU0dk5jZE4lN0VUOUZDRWNOR0J6aCU3RXV1blI3RmVNZDNfV2VCbG5kRVJBjTlxJTlx/p/887>, last accessed on September 17, 2021
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These allegations of infringement are preliminary and are therefore subject to change.

10. Starbucks has and continues to induce infringement. Starbucks 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) such as to cause infringement of one or more of claims 1–18 of the ‘852 patent, literally or under the doctrine of equivalents. Moreover, Starbucks has known or should have known of the ‘852 patent and the technology underlying it from at least the date of issuance of the patent.

11. Starbucks has and continues to contributorily infringe. Starbucks 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) and related services such as to cause infringement of one or more of claims 1–18 of the ‘852 patent, literally or under the doctrine of equivalents. Moreover, Starbucks has known or should have known of the ‘852 patent and the technology underlying it from at least the date of issuance of the patent.

12. Starbucks has caused and will continue to cause AuthWallet damage by direct and indirect infringement of (including inducing infringement of) the claims of the ‘852 patent.

IV. JURY DEMAND

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

V. PRAYER FOR RELIEF

WHEREFORE, AuthWallet prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the ‘852 patent through Starbucks payment links;
- b. award AuthWallet damages in an amount sufficient to compensate it for Defendant’s infringement of the ‘852 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 AuthWallet 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 AuthWallet 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 AuthWallet 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 "WR", enclosed within a large, loopy oval scribble.

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 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 AuthWallet, LLC