

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS**

FACTOR 2 MULTIMEDIA SYSTEMS, LLC,  
Plaintiff,

v.

EARLY WARNING SERVICES, LLC;  
BANK OF AMERICA CORPORATION.;  
TRUIST FINANCIAL CORPORATION;  
CAPITAL ONE FINANCIAL CORPORATION;  
JPMORGAN CHASE & CO.;  
THE PNC FINANCIAL SERVICES GROUP, INC.;  
U.S. BANCORP; and  
WELLS FARGO & COMPANY,  
Defendants.

CIVIL ACTION NO. 24-362

**COMPLAINT FOR PATENT  
INFRINGEMENT**

Jury Trial Demanded

1. Plaintiff Factor2 Multimedia Systems, LLC (“Factor2” or “Plaintiff”), by and through its undersigned counsel, alleges as follows for its Complaint against Defendants Early Warning Services; LLC; Bank of America Corporation; Truist Financial Corporation; Capital One Financial Corporation; JPMorgan Chase & Co.; The PNC Financial Services Group, Inc.; U.S. Bancorp; and Wells Fargo & Company (collectively, “Defendants”).

**THE NATURE OF THIS ACTION**

2. Factor2 brings this action against Early Warning pursuant to 35 U.S.C. § 101 et. seq. and §§ 271, 281, 283, 284, & 285 inclusive, for infringement of one or more claims of the following six patents, U.S. Patent Nos.:

8,281,129 “Direct Authentication System and Method Via Trusted Authenticators,”  
9,703,938 “Direct Authentication System and Method Via Trusted Authenticators,”  
9,727,864 “Centralized Identification and Authentication System and Method,”  
9,870,453 “Direct Authentication System and Method Via Trusted Authenticators,”  
10,083,285 “Direct Authentication System and Method Via Trusted Authenticators” and  
10,769,297 “Centralized Identification and Authentication System and Method.”

Collectively the “Patents-in-Suit.” Defendants have infringed the Patents-in-Suit, thereby necessitating this lawsuit.

3. Defendants make, use, develop, offer to sell, and sell and charge access to the Accused Instrumentalities throughout the United States. As set forth in more detail below, the Accused Instrumentalities include the Zelle System, as well as apparatuses associated with each of the Bank Defendants individually. The Accused Instrumentalities include authentication methods, apparatuses, or protocols that directly infringe the system and method claims of the Patents-in-Suit. The Accused Instrumentalities include systems that include all of the elements of the system and apparatus claims and that perform all of the method claims, and or utilize a separate system for authentication that includes all of the elements of the system and apparatus claims and that performs all of the method claims. Defendants’ “use” of a built in or separate system directly infringes the claims of the Patents-in-Suit. Defendants’ inducement of others to authenticate using a system and/or method that infringes the claims of the Patents-in-Suit indirectly infringes the claims of the Patents-in -Suit. Defendants’ contribution of elements of the infringing system indirectly infringes by contributing to infringement.

#### **THE PARTIES**

4. Plaintiff is a Virginia corporation having an address located at 5802 Orchard Hill Ln, Clifton, VA 20124-1061. Plaintiff is the owner of the Patents-in-Suit by assignment.

5. Defendant Early Warning Services, LLC (“Early Warning”) is a Delaware corporation with headquarters at 5801 N. Pima Road, Scottsdale, Arizona and a physical place of business in this judicial district. On information and belief, Defendant Early Warning is a limited liability company owned by Defendants Bank of America Corporation; Truist Financial Corporation; Capital One Financial Corporation; JPMorgan Chase & Co.; The PNC Financial

Services Group, Inc.; U.S. Bancorp; and Wells Fargo & Company (collectively, the “Bank Defendants”). Early Warning makes, uses, develops, offers to sell, and sells the accused products and systems and sells access to the accused products and profits from its use of the accused products throughout the United States. Early Warning designs and provides distribution of one or more of the Accused Instrumentalities and systems.

6. Defendant Bank of America Corporation (“Bank of America”) is a Delaware corporation with headquarters at 100 North Tryon Street, Charlotte, North Carolina 28255 and a physical place of business in this judicial district. Bank of America makes, uses, develops, offers to sell, and sells the Zelle System as well as an infringing internet website and application for Bank of America customers throughout the United States. Bank of America designs and provides distribution to each of the Accused Instrumentalities referenced immediately above.

7. Defendant Truist Financial Corporation (“Truist”) is a North Carolina corporation with headquarters at 214 North Tryon Street, Charlotte, North Carolina and a physical place of business in this judicial district. Truist makes, uses, develops, offers to sell, and sells the Zelle System as well as an infringing internet website and application for Truist customers throughout the United States. Truist designs and provides distribution to each of the Accused Instrumentalities referenced immediately above.

8. Defendant Capital One Financial Corporation. (“Capital One”) is a Delaware corporation with headquarters at 1680 Capital One Drive, McLean, Virginia 22102 and a physical place of business in this judicial district. Capital One makes, uses, develops, offers to sell, and sells the Zelle System as well as an infringing internet website and application for Capital One customers throughout the United States. Capital One designs and provides distribution to each of the Accused Instrumentalities referenced immediately above.

9. Defendant JPMorgan Chase & Co. (“JPMorgan Chase”) is a Delaware corporation with headquarters at 383 Madison Avenue, New York, New York, 10017 and a physical place of business in this judicial district. JPMorgan Chase makes, uses, develops, offers to sell, and sells the Zelle System as well as an infringing internet website and application for JPMorgan Chase customers throughout the United States. JPMorgan Chase designs and provides distribution to each of the Accused Instrumentalities referenced immediately above.

10. Defendant The PNC Financial Services Group, Inc. (“PNC”) is a Pennsylvania corporation with headquarters at One PNC Plaza, 249 Fifth Avenue, Pittsburgh, Pennsylvania 15222 and a physical place of business in this judicial district. PNC makes, uses, develops, offers to sell, and sells the Zelle System as well as an infringing internet website and application for PNC customers throughout the United States. PNC designs and provides distribution to each of the Accused Instrumentalities referenced immediately above.

11. Defendant U.S. Bancorp (“U.S. Bank”) is a Delaware corporation with headquarters at 800 Nicollet Mall, Minneapolis, MN 55402 and a physical place of business in this judicial district. U.S. Bank makes, uses, develops, offers to sell, and sells the Zelle System as well as an infringing internet website and application for U.S. Bank customers throughout the United States. U.S. Bank designs and provides distribution to each of the Accused Instrumentalities referenced immediately above.

12. Defendant Wells Fargo & Company (“Wells Fargo”) is a Delaware corporation with headquarters at 420 Montgomery St, San Francisco, California, 94104 and a physical place of business in this judicial district. Wells Fargo makes, uses, develops, offers to sell, and sells the Zelle System as well as an infringing internet website and application for Wells Fargo

customers throughout the United States. Wells Fargo designs and provides distribution to each of the Accused Instrumentalities referenced immediately above.

**JURISDICTION AND VENUE**

13. This is an action for patent infringement arising under the laws of the United States, 35 U.S.C. § 271 et seq.

14. This Court has subject matter jurisdiction over this action pursuant to 35 U.S.C. §§ 271, 281 and 28 U.S.C. §§ 1331 and 1338(a), federal question.

15. This Court has personal jurisdiction over Defendant Early Warning because Early Warning has a regular and established place of business in this district at 901 S MoPac Expressway, Austin, TX 78746.

16. This Court has personal jurisdiction over Defendant Bank of America because Bank of America has a regular and established place of business in this district at 1144 Airport Blvd., Austin, TX 78702.

17. This Court has personal jurisdiction over Defendant Truist because Truist has a regular and established place of business in this district at 611 W 5th St., Austin, TX 78701.

18. This Court has personal jurisdiction over Defendant Capital One because Capital One has a regular and established place of business in this district at 106 E 6th St., Austin, TX 78701.

19. This Court has personal jurisdiction over Defendant JPMorgan Chase because JPMorgan Chase has a regular and established place of business in this district 221 W Sixth St. Austin , TX 78701.

20. This Court has personal jurisdiction over Defendant PNC because PNC has a regular and established place of business in this district at 13497 N Hwy 183, Austin, TX 78750.

21. This Court has personal jurisdiction over Defendant U.S. Bank because U.S. Bank has a regular and established place of business in this district at 3121 Sunset Dr, San Angelo, TX 76904. 439 E Central Texas Expy Suite B Harker Heights, TX 76548

22. This Court has personal jurisdiction over Defendant Wells Fargo because Wells Fargo has a regular and established place of business in this district at 111 Congress Ave, Austin, TX, 78701.

23. Venue is proper in this District for each of the Defendants pursuant to 28 U.S.C. §§ 1400(a), 1400(b) and because each of the Defendants maintain a regular and established place of business in this District and each has committed acts of infringement, including, development, support, use, sale, and offers to sell infringing products.

#### **BACKGROUND AND GENERAL ALLEGATIONS**

24. Factor2 is the current assignee of the Patents-in-Suit

25. Defendants provide and sell access to the Accused Instrumentalities.

26. The Accused Instrumentalities uses a system and method for authentication that infringes claims of each of the Patents-in-Suit.

#### **THE PATENTS-IN-SUIT**

27. On October 2, 2012, United States Patent No. 8,281,129 (“the ’129 Patent”) titled “Direct Authentication System And Method Via Trusted Authenticators,” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The ’129 Patent claims patent-eligible subject matter and is valid and enforceable. Factor2 is the exclusive owner by assignment of all rights, title, and interest in the ’129 Patent, including the right to bring this suit for damages, and including the right to sue and recover all past, present, and future damages for infringement of the ’129 Patent. Defendants is not licensed to the ’129 Patent, either expressly

or implicitly, nor do they enjoy or benefit from any rights in or to the '129 Patent whatsoever. A true and correct copy of the '129 Patent is attached hereto as **Exhibit A**.

28. On July 11, 2017, United States Patent No. 9,703,938 (“the '938 Patent”) titled “Direct Authentication System And Method Via Trusted Authenticators” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The '938 Patent claims patent-eligible subject matter and is valid and enforceable. Factor2 is the exclusive owner by assignment of all rights, title, and interest in the '938 Patent, including the right to bring this suit for damages, and including the right to sue and recover all past, present, and future damages for infringement of the '938 Patent. Defendants is not licensed to the '938 Patent, either expressly or implicitly, nor do they enjoy or benefit from any rights in or to the '938 Patent whatsoever. A true and correct copy of the '938 Patent is attached hereto as **Exhibit B**.

29. On July 19, 2017, United States Patent No. 9,727,864 (“the '864 Patent”) titled “Centralized Identification and Authentication System and Method” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The '864 Patent claims patent-eligible subject matter and is valid and enforceable. Factor2 is the exclusive owner by assignment of all rights, title, and interest in the '864 Patent, including the right to bring this suit for damages, and including the right to sue and recover all past, present, and future damages for infringement of the '864 Patent. Defendants is not licensed to the '864 Patent, either expressly or implicitly, nor do they enjoy or benefit from any rights in or to the '864 Patent whatsoever. A true and correct copy of the '864 Patent is attached hereto as **Exhibit C**.

30. On December 27, 2017, United States Patent No. 9,870,453 (“the '453 Patent”) titled “Direct Authentication System and Method Via Trusted Authenticators,” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The '453 Patent

claims patent-eligible subject matter and is valid and enforceable. Factor2 is the exclusive owner by assignment of all rights, title, and interest in the '453 Patent, including the right to bring this suit for damages, and including the right to sue and recover all past, present, and future damages for infringement of the '453 Patent. Defendants is not licensed to the '453 Patent, either expressly or implicitly, nor do they enjoy or benefit from any rights in or to the '453 Patent whatsoever. A true and correct copy of the '453 Patent is attached hereto as **Exhibit D**.

31. On September 5, 2018, United States Patent No. 10,083,285 (“the '285 Patent”) titled “Direct Authentication System and Method Via Trusted Authenticators,” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The '285 Patent claims patent-eligible subject matter and is valid and enforceable. Factor2 is the exclusive owner by assignment of all rights, title, and interest in the '285 Patent, including the right to bring this suit for damages, and including the right to sue and recover all past, present, and future damages for infringement of the '285 Patent. Defendants is not licensed to the '285 Patent, either expressly or implicitly, nor do they enjoy or benefit from any rights in or to the '285 Patent whatsoever. A true and correct copy of the '285 Patent is attached hereto as **Exhibit E**.

32. On August 19, 2020, United States Patent No. 10,769,297 (“the '297 Patent”) titled “Centralized Identification and Authentication System and Method.” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”). The '297 Patent claims patent-eligible subject matter and is valid and enforceable. Factor2 is the exclusive owner by assignment of all rights, title, and interest in the '297 Patent, including the right to bring this suit for damages, and including the right to sue and recover all past, present, and future damages for infringement of the '297 Patent. Defendants is not licensed to the '297 Patent, either expressly



or implicitly, nor do they enjoy or benefit from any rights in or to the '297 Patent whatsoever. A true and correct copy of the '297 Patent is attached hereto as **Exhibit F**.

33. Each of the Patents-in-Suit is a member of the same patent family.

34. The claims of the '297 Patent are representative of the family of patents and are directed to “[a]n authentication system for enhancing computer network security.” Claim 1 of the '297 Patent recites:

Claim 1. An authentication system for enhancing computer network security by authenticating a user in an electronic communication between a computing device of the user and an online computer system, the authentication system comprising one or more computing devices configured to perform operations comprising:

while the online computer system is connected to the computing device of the user via a communication network, electronically receiving a request for a SecureCode;

generating the SecureCode;

while the online computer system is connected to the computing device of the user via the communication network, electronically providing to the user the SecureCode in response to the request for the SecureCode, wherein:

the SecureCode is invalid after a predetermined time passes,

the SecureCode is invalid after one use of the SecureCode for authentication, and

the SecureCode is only valid for authenticating the user; and

while the online computer system is connected to the computing device of the user via the communication network, electronically receiving from the online computer system a digital authentication request for authenticating the user, wherein:

the digital authentication request comprises a digital identity of the user, and

the digital identity includes the SecureCode; and

while the online computer system is connected to the computing device of the user via the communication network, authenticating the user by evaluating a validity of the SecureCode included in the digital authentication request.

35. Method claims of the '129 Patent are also representative of the method claims of the Patents-in-suit. Claim 1 of the '129 Patent recites:

Claim 1 A computer implemented method to authenticate an individual in communication with an entity over a communication network during a communication between the entity and the individual, the computer implemented method comprising:

receiving electronically a request for a dynamic code for the individual, which request is received from the individual by a trusted-authenticators computer during an authentication of the individual by the entity:

calculating by the trusted-authenticators computer the dynamic code for the individual in response to the request during the authentication of the individual by the

entity, wherein the dynamic code is valid for a predefined time and becomes invalid after being used;

    sending by the trusted-authenticator's computer electronically the dynamic code to the individual during the authentication of the individual by the entity:

    receiving by the trusted-authenticator's computer electronically an authentication request from the entity to authenticate the individual based on a user information and the dynamic code included in the authentication request, wherein the entity receives the user information and the dynamic code from the individual; and

    authenticating by the trusted-authenticator's computer an identity of the individual based on the user information and the dynamic code included in the authentication request, wherein the result of the authentication is provided to the entity.

### **THE ZELLE SYSTEM**

36. Defendant Early Warning makes and provides the Zelle System, which includes at least the Zelle mobile application available for use on iOS and Android devices, as well as via the mobile applications and internet websites of financial institutions that employ the Zelle System, but also the back end systems and backbone which provides access and functionality to the Zelle System and distributes content and authenticates users using the Zelle System. The Zelle System infringes at least one claim of each of the Patents-in-Suit.

37. The Bank Defendants together own Defendant Early Warning and are also liable for making, using, selling, and offering to sell the Zelle System in the United States.

38. On information and belief, Defendant Early Warning and the Bank Defendants operate additional websites, mobile applications, and/or features or aspects of the Zelle website or Zelle mobile application that also infringe the Patents-in-Suit.

39. Defendant Early Warning and the Bank Defendants have, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by making, using, testing, selling, offering for sale and/or importing into the United States the Zelle System.

40. Defendant Early Warning and the Bank Defendants also indirectly infringe the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant Early Warning and the Bank Defendants have knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including Zelle System users throughout the United States. Defendant Early Warning and the Bank Defendants continue to induce infringement of the Patents-in-Suit.

41. Defendant Early Warning states that it has partnered with “2100+” financial institutions and that the Zelle System “is already in over 2,000 banking apps.” End users can access and use the Zelle System either through the “banking apps” offered by Early Warning’s financial institution partners or through the Zelle mobile application offered by Early Warning.

42. Defendant Early Warning and the Bank Defendants have contributorily infringed and continue to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, they supply a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant Early Warning and the Bank Defendants contribute to their customers’ infringement because, with knowledge of the Patents-in-Suit, these Defendants supply the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

43. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the Zelle System directly infringes, contributes to, and induces

infringement and, when used according to Defendants' instructions for operation, indirectly infringe claims of the Patents-in-Suit.

44. The Zelle System and/or method of operating the Zelle System satisfies the elements of at least one claim of each of the asserted patents.

45. For example, attached as **Exhibit G** to the Complaint is an exemplary claim chart demonstrating the correspondence of the operation of the Zelle System with elements of claim 1 of the '297 Patent. Although the claim chart depicts the operation of the Zelle System as incorporated in the Bank of America mobile application, the allegations in the claim chart are applicable to all embodiments of the Zelle System.

46. Upon information and belief, Defendant Early Warning and the Bank Defendants have directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing accused products in the United States.

47. Upon information and belief, Defendant Early Warning and the Bank Defendants have indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*

by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

48. Upon information and belief, Defendant Early Warning and the Bank Defendants have indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*

by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendants contributes to the infringement of the Patents-in-Suit.

49. Defendants' infringement has been willful since at least as early as they became aware of the Patents-in-Suit.

50. Upon information and belief, Defendants has no good faith defense to Plaintiff's infringement allegations.

51. As a result of Defendants' infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

### **THE BANK OF AMERICA SYSTEM**

52. Defendant Bank of America is a financial institution that provides access to online banking services through its online website and through a mobile banking application. The accused "Bank of America System" comprises at least the Bank of America mobile banking application and the online website located at [www.bankofamerica.com](http://www.bankofamerica.com). The Bank of America System infringes one or more claims of each of the Patents-in-Suit. Defendant Bank of America is liable for making, using, selling, and offering to sell the Bank of America System in the United States.

53. The Bank of America mobile application is available for iOS and Android devices and can be downloaded via the Apple App Store or the Google Play Store.

54. The Bank of America website is accessible on the internet via web browser on computers and mobile devices (tablets, mobile phones, etc.) at [www.bankofamerica.com](http://www.bankofamerica.com).

55. A claim chart showing how the Bank of America System meets each of the elements of claim 1 of the '297 Patent is attached hereto as **Exhibit H**. Although the claim chart depicts the operation of the Bank of America System in the mobile application, the allegations in this complaint and accompanying claim chart are applicable to all embodiments of the Bank of America System.

56. On information and belief, Defendant Bank of America operates additional websites, mobile applications, and/or features or aspects of the Bank of America website or mobile application that also infringe the Patents-in-Suit.

57. Defendant Bank of America has, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by making, using, testing, selling, offering for sale and/or importing into the United States the Bank of America System.

58. Defendant Bank of America also indirectly infringes the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant Bank of America has knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including Bank of America System users throughout the United States. Defendant Bank of America continues to induce infringement of the Patents-in-Suit.

59. Defendant Bank of America has contributorily infringed and continues to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, it supplies a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant Bank of

America contributes to its customers' infringement because, with knowledge of the Patents-in-Suit, Defendant Bank of America supplies the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

60. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the Bank of America System directly infringes, contributes to, and induces infringement and, when used according to Defendant's instructions for operation, indirectly infringe claims of the Patents-in-Suit.

61. The Bank of America System and/or method of operating the Bank of America System satisfies the elements of at least one claim of each of the asserted patents.

62. Upon information and belief, Defendant Bank of America has directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing the accused products in the United States.

63. Upon information and belief, Defendant Bank of America has indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*

by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

64. Upon information and belief, Defendant Bank of America has indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*

by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendant contributes to the infringement of the Patents-in-Suit.

65. Defendant Bank of America's infringement has been willful since at least as early as it became aware of the Patents-in-Suit.

66. Upon information and belief, Defendant Bank of America has no good faith defense to Plaintiff's infringement allegations.

67. As a result of Defendant Bank of America's infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

### **THE TRUIST SYSTEM**

68. Defendant Truist is a financial institution that provides access to online banking services through its online website and through a mobile banking application. The accused "Truist System" comprises the mobile banking application (Truist App) and the online website (Truist website). The Truist System infringes one or more claims of each of the Patents-in-Suit. Defendant Truist is liable for making, using, selling, and offering to sell the Truist System in the United States.

69. The Truist website is accessible on the internet via web browser on computers and mobile devices (tablets, mobile phones, etc.) at [www.truist.com](http://www.truist.com). A claim chart showing how the Truist website meets each of the elements of claim 1 of the '297 Patent is attached hereto as

**Exhibit I.**



70. The Truist mobile application is available for iOS and Android devices and can be downloaded via the Apple App Store or the Google Play Store. The Truist mobile application operates in all relevant aspects in the same manner as the Truist website.

71. On information and belief, Defendant Truist operates additional websites, mobile applications, and/or features or aspects of the Truist website or Truist mobile application that also infringe the Patents-in-Suit.

72. A claim chart showing how the Truist System meets each of the elements of claim 1 of the '297 Patent is attached hereto as **Exhibit I**. The allegations in this complaint and accompanying claim chart are applicable to all embodiments of the Bank of America System, whether accessed via the Truist internet website, or the Truist mobile application, or otherwise.

73. Defendant Truist has, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by making, using, testing, selling, offering for sale and/or importing into the United States the Truist System.

74. Defendant Truist also indirectly infringes the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant Truist has knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including Truist System users throughout the United States. Defendant Truist continues to induce infringement of the Patents-in-Suit.

75. Defendant Truist has contributorily infringed and continues to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, it supplies a material part of an infringing method and/or system, where the material part is not a staple article

of commerce, and is incapable of substantial noninfringing use. Defendant Truist contributes to its customers' infringement because, with knowledge of the Patents-in-Suit, Defendant Truist supplies the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

76. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the Truist System directly infringes, contributes to, and induces infringement and, when used according to Defendant's instructions for operation, indirectly infringe claims of the Patents-in-Suit.

77. The Truist System and/or method of operating the Truist System satisfies the elements of at least one claim of each of the asserted patents.

78. Attached as **Exhibit I** to the Complaint is an exemplary claim chart demonstrating the correspondence of the operation of the Truist System with elements of claim 1 of the '297 Patent. Although the claim chart relates specifically to the operation of the Truist website, the allegations in the claim chart are applicable to all embodiments of the Truist System.

79. Upon information and belief, Defendant Truist has directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing the accused products in the United States.

80. Upon information and belief, Defendant Truist has indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*

by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

81. Upon information and belief, Defendant Truist has indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*

by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendant contributes to the infringement of the Patents-in-Suit.

82. Defendant Truist's infringement has been willful since at least as early as it became aware of the Patents-in-Suit.

83. Upon information and belief, Defendant Truist has no good faith defense to Plaintiff's infringement allegations.

84. As a result of Defendant Truist's infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

### **THE CAPITAL ONE SYSTEM**

85. Defendant Capital One is a financial institution that provides access to online banking services through its online website and through a mobile banking application. The accused "Capital One System" comprises the mobile banking application (Capital One App) and the online website (Capital One website). The Capital One System infringes one or more claims of each of the Patents-in-Suit. Defendant Capital One is liable for making, using, selling, and offering to sell the Capital One System in the United States.

86. The Capital One website is accessible on the internet via web browser on computers and mobile devices (tablets, mobile phones, etc.) at [www.capitalone.com](http://www.capitalone.com).

87. The Capital One mobile application is available for iOS and Android devices and can be downloaded via the Apple App Store or the Google Play Store. The Capital One mobile application operates in all relevant aspects in the same manner as the Capital One website.

88. A claim chart showing how the Capital One System meets each of the elements of claim 1 of the '297 Patent is attached hereto as **Exhibit J**. Although the claim chart depicts the operation of the Capital One System in the mobile application, the allegations in this complaint and accompanying claim chart are applicable to all embodiments of the Capital One System.

89. On information and belief, Defendant Capital One operates additional websites, mobile applications, and/or features or aspects of the Capital One website or Capital One mobile application that also infringe the Patents-in-Suit.

90. Defendant Capital One has, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by making, using, testing, selling, offering for sale and/or importing into the United States the Capital One System.

91. Defendant Capital One also indirectly infringes the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant Capital One has knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including Capital One System users throughout the United States. Defendant Capital One continues to induce infringement of the Patents-in-Suit.

92. Defendant Capital One has contributorily infringed and continues to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, it supplies a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant Capital One contributes to its customers' infringement because, with knowledge of the Patents-in-Suit, Defendant Capital One supplies the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

93. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the Capital One System directly infringes, contributes to, and induces infringement and, when used according to Defendant's instructions for operation, indirectly infringe claims of the Patents-in-Suit.

94. The Capital One System and/or method of operating the Capital One System satisfies the elements of at least one claim of each of the asserted patents.

95. Attached as **Exhibit I** to the Complaint is an exemplary claim chart demonstrating the correspondence of the operation of the Capital One System with elements of claim 1 of the '297 Patent. Although the claim chart relates specifically to the operation of the Capital One website, the allegations in the claim chart are applicable to all embodiments of the Capital One System.

96. Upon information and belief, Defendant Capital One has directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing the accused products in the United States.

97. Upon information and belief, Defendant Capital One has indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*  
by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

98. Upon information and belief, Defendant Capital One has indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*  
by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendant contributes to the infringement of the Patents-in-Suit.

99. Defendant Capital One's infringement has been willful since at least as early as it became aware of the Patents-in-Suit.

100. Upon information and belief, Defendant Capital One has no good faith defense to Plaintiff's infringement allegations.

101. As a result of Defendant Capital One's infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**THE JPMORGAN CHASE SYSTEM**

102. Defendant JPMorgan Chase is a financial institution that provides access to online banking services through a mobile banking application and its online website at [www.chase.com](http://www.chase.com), among other websites. The accused “JPMorgan Chase System” comprises at least the mobile banking application and the online websites. The JPMorgan Chase System infringes one or more claims of each of the Patents-in-Suit. Defendant JPMorgan Chase is liable for making, using, selling, and offering to sell the JPMorgan Chase System in the United States.

103. The JPMorgan Chase website is accessible on the internet via web browser on computers and mobile devices (tablets, mobile phones, etc.) at [www.chase.com](http://www.chase.com). A claim chart showing how the JPMorgan Chase website meets each of the elements of claim 1 of the '297 Patent is attached hereto as **Exhibit K**.

104. The JPMorgan Chase mobile application is available for iOS and Android devices and can be downloaded via the Apple App Store or the Google Play Store.

105. On information and belief, Defendant JPMorgan Chase operates additional websites, mobile applications, and/or features or aspects of the JPMorgan Chase website or JPMorgan Chase mobile application that also infringe the Patents-in-Suit.

106. On information and belief, the JPMorgan Chase mobile application and other internet websites operated by JPMorgan Chase operate in all relevant aspects in the same manner as the JPMorgan Chase website ([www.chase.com](http://www.chase.com)) described in **Exhibit K**. Although the claim chart relates specifically to the operation of the JPMorgan Chase website, the allegations in the claim chart are applicable to all embodiments of the JPMorgan Chase System.

107. Defendant JPMorgan Chase has, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by

making, using, testing, selling, offering for sale and/or importing into the United States the JPMorgan Chase System.

108. Defendant JPMorgan Chase also indirectly infringes the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant JPMorgan Chase has knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including JPMorgan Chase System users throughout the United States. Defendant JPMorgan Chase continues to induce infringement of the Patents-in-Suit.

109. Defendant JPMorgan Chase has contributorily infringed and continues to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, it supplies a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant JPMorgan Chase contributes to its customers' infringement because, with knowledge of the Patents-in-Suit, Defendant JPMorgan Chase supplies the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

110. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the JPMorgan Chase System directly infringes, contributes to, and induces infringement and, when used according to Defendant's instructions for operation, indirectly infringe claims of the Patents-in-Suit.

111. The JPMorgan Chase System and/or method of operating the JPMorgan Chase System satisfies the elements of at least one claim of each of the asserted patents.



112. Upon information and belief, Defendant JPMorgan Chase has directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing the accused products in the United States.

113. Upon information and belief, Defendant JPMorgan Chase has indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*

by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

114. Upon information and belief, Defendant JPMorgan Chase has indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*

by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendant contributes to the infringement of the Patents-in-Suit.

115. Defendant JPMorgan Chase's infringement has been willful since at least as early as it became aware of the Patents-in-Suit.

116. Upon information and belief, Defendant JPMorgan Chase has no good faith defense to Plaintiff's infringement allegations.

117. As a result of Defendant JPMorgan Chase's infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

### **THE PNC SYSTEM**

118. Defendant PNC is a financial institution that provides access to online banking services through its online website and through a mobile banking application. The accused "PNC System" comprises the mobile banking application and the online website. The PNC System infringes one or more claims of each of the Patents-in-Suit. Defendant PNC is liable for making, using, selling, and offering to sell the PNC System in the United States.

119. The PNC website is accessible on the internet via web browser on computers and mobile devices (tablets, mobile phones, etc.) at [www.pncbank.com](http://www.pncbank.com) or [www.pnc.com](http://www.pnc.com).

120. The PNC mobile application is available for iOS and Android devices and can be downloaded via the Apple App Store or the Google Play Store. The PNC mobile application operates in all relevant aspects in the same manner as the PNC website.

121. A claim chart showing how the PNC System meets each of the elements of claim 1 of the '297 Patent is attached hereto as **Exhibit L**. The allegations in this complaint and accompanying claim chart are applicable to all embodiments of the PNC System.

122. On information and belief, Defendant PNC operates additional websites, mobile applications, and/or features or aspects of the PNC website or PNC mobile application that also infringe the Patents-in-Suit.

123. Defendant PNC has, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by making, using, testing, selling, offering for sale and/or importing into the United States the PNC System.

124. Defendant PNC also indirectly infringes the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant PNC has knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including PNC System users throughout the United States. Defendant PNC continues to induce infringement of the Patents-in-Suit.

125. Defendant PNC has contributorily infringed and continues to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, it supplies a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant PNC contributes to its customers' infringement because, with knowledge of the Patents-in-Suit, Defendant PNC supplies the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

126. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the PNC System directly infringes, contributes to, and induces infringement and, when used according to Defendant's instructions for operation, indirectly infringe claims of the Patents-in-Suit.

127. The PNC System and/or method of operating the PNC System satisfies the elements of at least one claim of each of the asserted patents.

128. Upon information and belief, Defendant PNC has directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing the accused products in the United States.

129. Upon information and belief, Defendant PNC has indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*

by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

130. Upon information and belief, Defendant PNC has indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*

by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendant contributes to the infringement of the Patents-in-Suit.

131. Defendant PNC's infringement has been willful since at least as early as it became aware of the Patents-in-Suit.

132. Upon information and belief, Defendant PNC has no good faith defense to Plaintiff's infringement allegations.

133. As a result of Defendant PNC's infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**THE U.S. BANK SYSTEM**

134. Defendant U.S. Bank is a financial institution that provides access to online banking services through its online website and through a mobile banking application. The accused “U.S. Bank System” comprises the mobile banking application and the online website (U.S. Bank website). The U.S. Bank System infringes one or more claims of each of the Patents-in-Suit. Defendant U.S. Bank is liable for making, using, selling, and offering to sell the U.S. Bank System in the United States.

135. The U.S. Bank website (“U.S. Bank website”) is accessible on the internet via web browser on computers and mobile devices (tablets, mobile phones, etc.) at [www.usbank.com](http://www.usbank.com).

136. The U.S. Bank mobile application is available for iOS and Android devices and can be downloaded via the Apple App Store or the Google Play Store. The U.S. Bank mobile application operates in all relevant aspects in the same manner as the U.S. Bank website.

137. A claim chart showing how the U.S. Bank System meets each of the elements of claim 1 of the ’297 Patent is attached hereto as **Exhibit M**. The allegations in this complaint and accompanying claim chart are applicable to all embodiments of the U.S. Bank System.

138. On information and belief, Defendant U.S. Bank operates additional websites, mobile applications, and/or features or aspects of the U.S. Bank website or U.S. Bank mobile application that also infringe the Patents-in-Suit.

139. Defendant U.S. Bank has, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by making, using, testing, selling, offering for sale and/or importing into the United States the U.S. Bank System.

140. Defendant U.S. Bank also indirectly infringes the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant U.S. Bank has knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including U.S. Bank System users throughout the United States. Defendant U.S. Bank continues to induce infringement of the Patents-in-Suit.

141. Defendant U.S. Bank has contributorily infringed and continues to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, it supplies a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant U.S. Bank contributes to its customers' infringement because, with knowledge of the Patents-in-Suit, Defendant U.S. Bank supplies the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

142. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the U.S. Bank System directly infringes, contributes to, and induces infringement and, when used according to Defendant's instructions for operation, indirectly infringe claims of the Patents-in-Suit.

143. The U.S. Bank System and/or method of operating the U.S. Bank System satisfies the elements of at least one claim of each of the asserted patents.

144. Upon information and belief, Defendant U.S. Bank has directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing the accused products in the United States.

145. Upon information and belief, Defendant U.S. Bank has indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*

by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

146. Upon information and belief, Defendant U.S. Bank has indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*

by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendant contributes to the infringement of the Patents-in-Suit.

147. Defendant U.S. Bank's infringement has been willful since at least as early as it became aware of the Patents-in-Suit.

148. Upon information and belief, Defendant U.S. Bank has no good faith defense to Plaintiff's infringement allegations.

149. As a result of Defendant U.S. Bank's infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**THE WELLS FARGO SYSTEM**

150. Defendant Wells Fargo is a financial institution that provides access to online banking services through its online website and through a mobile banking application. The accused “Wells Fargo System” comprises the mobile banking application and the online website. The Wells Fargo System infringes one or more claims of each of the Patents-in-Suit. Defendant Wells Fargo is liable for making, using, selling, and offering to sell the Wells Fargo System in the United States.

151. The Wells Fargo website is accessible on the internet via web browser on computers and mobile devices (tablets, mobile phones, etc.) at [www.wellsfargo.com](http://www.wellsfargo.com).

152. The Wells Fargo mobile application is available for iOS and Android devices and can be downloaded via the Apple App Store or the Google Play Store. The Wells Fargo mobile application operates in all relevant aspects in the same manner as the Wells Fargo website.

153. A claim chart showing how the Wells Fargo System meets each of the elements of claim 1 of the '297 Patent is attached hereto as **Exhibit N**. Although the claim chart depicts the operation of the Wells Fargo System in the mobile application, the allegations in this complaint and accompanying claim chart are applicable to all embodiments of the Wells Fargo System.

154. On information and belief, Defendant Wells Fargo operates additional websites, mobile applications, and/or features or aspects of the Wells Fargo website or Wells Fargo mobile application that also infringe the Patents-in-Suit.

155. Defendant Wells Fargo has, under 35 U.S.C. § 271(a), directly infringed, literally and/or under the doctrine of equivalents, one or more claims of the Patents-in-Suit, by making, using, testing, selling, offering for sale and/or importing into the United States the Wells Fargo System.



156. Defendant Wells Fargo also indirectly infringes the Patents-in-Suit by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b). Defendant Wells Fargo has knowingly and intentionally actively induced others to directly infringe at least one claim of the Patents-in-Suit by providing software through which its customers practice the claimed methods and by providing infringing systems used by its customers, including Wells Fargo System users throughout the United States. Defendant Wells Fargo continues to induce infringement of the Patents-in-Suit.

157. Defendant Wells Fargo has contributorily infringed and continues to contributorily infringe under 35 U.S.C. § 271(c) because, with knowledge of the Patents-in-Suit, it supplies a material part of an infringing method and/or system, where the material part is not a staple article of commerce, and is incapable of substantial noninfringing use. Defendant Wells Fargo contributes to its customers' infringement because, with knowledge of the Patents-in-Suit, Defendant Wells Fargo supplies the technology that allows its financial institution partners and its end-users to infringe the patent, including by allowing their customers to practice the method claims.

158. Plaintiff has conducted a detailed analysis, establishing and confirming, on information and belief, that the Wells Fargo System directly infringes, contributes to, and induces infringement and, when used according to Defendant's instructions for operation, indirectly infringe claims of the Patents-in-Suit.

159. Upon information and belief, Defendant Wells Fargo has directly infringed one or more of the claims of the Patents-in-Suit under 35 USC 271(a):

*(a) Except as otherwise provided in this title, whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.*

by engaging in accused activity including making, using, distributing, offering to sell, selling and importing the accused products in the United States.

160. Upon information and belief, Defendant Wells Fargo has indirectly infringed one or more of the claims of the Patents-in-suit under 35 USC § 271(b):

*(b) Whoever actively induces infringement of a patent shall be liable as an infringer.*  
by providing accused products, with instructions, which are used to practice the patented methods according to the instructions and thereby inducing others to use the products in an infringing manner.

161. Upon information and belief, Defendant Wells Fargo has indirectly infringed one or more of the claims of the patents-in suit under 35 USC § 271(c):

*(c) Whoever offers to sell or sells within the United States or imports into the United States... or apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in an infringement of such patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use, shall be liable as a contributory infringer.*  
by providing accused products, and other components and supplies, which are combined to form an infringing system and/which infringe the claims of the Patents-in-Suit, Defendant contributes to the infringement of the Patents-in-Suit.

162. Defendant Wells Fargo's infringement has been willful since at least as early as it became aware of the Patents-in-Suit.

163. Upon information and belief, Defendant Wells Fargo has no good faith defense to Plaintiff's infringement allegations.

164. As a result of Defendant Wells Fargo's infringement of the Patents-in-Suit, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**INFRINGEMENT OF U.S. PATENT NO. 8,281,129**

**COUNT 1  
DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129  
(Against All Defendants – Zelle System)**

165. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

166. Each of the Defendants has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Zelle System in the United States.

167. Neither Defendants nor their customers have a license or authority to use the '129 Patent.

168. As a result of each of the Defendants' infringement of the '129 Patent via the Zelle System, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

169. Defendants' infringement of the '129 Patent via the Zelle System has been willful under 35 U.S.C. § 284.

**COUNT 2  
INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129  
(Against All Defendants – Zelle System)**

170. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

171. Each of the Defendants has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.

172. Neither Defendants nor their customers have a license or authority to use the '129 Patent.

173. As a result of Defendants' indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

174. Defendants' indirect induced infringement of the '129 patent has been willful under 35 U.S.C. § 284.

**COUNT 3**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against All Defendants – Zelle System)**

175. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

176. Each of the Defendants has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the Zelle System, which is used as a component of infringing systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

177. Neither Defendants nor their customers have a license or authority to use the '129 Patent

178. As a result of Defendants' indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

179. Defendants' indirect contributory infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 4**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Bank of America)**

180. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

181. Defendant Bank of America has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Bank of America System in the United States.

182. Neither Defendant Bank of America nor its customers have a license or authority to use the '129 Patent.

183. As a result of Defendant Bank of America's infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

184. Defendant Bank of America's infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 5**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Bank of America)**

185. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

186. Defendant Bank of America has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent via the Bank of America System, which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.

187. Neither Defendant Bank of America nor its customers have a license or authority to use the '129 Patent.

188. As a result of Defendant Bank of America's indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

189. Defendant Bank of America's indirect induced infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 6**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Bank of America)**

190. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

191. Defendant Bank of America has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the Bank of America System, which is used as a component of infringing systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

192. Neither Defendant Bank of America nor its customers have a license or authority to use the '129 Patent

193. As a result of Defendant Bank of America's indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

194. Defendant Bank of America's indirect contributory infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 7**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Truist)**

195. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

196. Defendant Truist has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Truist System in the United States.

197. Neither Defendant Truist nor its customers have a license or authority to use the '129 Patent.

198. As a result of Defendant Truist's infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

199. Defendant Truist's infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 8**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Truist)**

200. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

201. Defendant Truist has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent via the Truist System, which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.

202. Neither Defendant Truist nor its customers have a license or authority to use the '129 Patent.

203. As a result of Defendant Truist's indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

204. Defendant Truist's indirect induced infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 9**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Truist)**

205. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

206. Defendant Truist has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the Truist System, which is used as a component of infringing

systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

207. Neither Defendant Truist nor its customers have a license or authority to use the '129 Patent

208. As a result of Defendant Truist's indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

209. Defendant Truist's indirect contributory infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 10**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Capital One)**

210. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

211. Defendant Capital One has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Capital One System in the United States.

212. Neither Defendant Capital One nor its customers have a license or authority to use the '129 Patent.

213. As a result of Defendant Capital One's infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

214. Defendant Capital One's infringement of the '129 Patent has been willful under 35 U.S.C. § 284.



**COUNT 11**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Capital One)**

215. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

216. Defendant Capital One has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent via the Capital One System, which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.

217. Neither Defendant Capital One nor its customers have a license or authority to use the '129 Patent.

218. As a result of Defendant Capital One's indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

219. Defendant Capital One's indirect induced infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 12**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Capital One)**

220. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

221. Defendant Capital One has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the Capital One System, which is used as a component of infringing systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

222. Neither Defendant Capital One nor its customers have a license or authority to use the '129 Patent

223. As a result of Defendant Capital One's indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

224. Defendant Capital One's indirect contributory infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 13**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against JPMorgan Chase)**

225. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

226. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

227. Defendant JPMorgan Chase has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the JPMorgan Chase System in the United States.

228. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '129 Patent.

229. As a result of Defendant JPMorgan Chase's infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

230. Defendant JPMorgan Chase's infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 14**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against JPMorgan Chase)**

231. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

232. Defendant JPMorgan Chase has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent via the JPMorgan Chase System, which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.

233. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '129 Patent.

234. As a result of Defendant JPMorgan Chase's indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

235. Defendant JPMorgan Chase's indirect induced infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 15**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against JPMorgan Chase)**

236. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

237. Defendant JPMorgan Chase has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the JPMorgan Chase System, which is used as a component of infringing systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

238. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '129 Patent

239. As a result of Defendant JPMorgan Chase's indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

240. Defendant JPMorgan Chase's indirect contributory infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 16**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against PNC)**

241. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

242. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

243. Defendant PNC has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the PNC System in the United States.

244. Neither Defendant PNC nor its customers have a license or authority to use the '129 Patent.

245. As a result of Defendant PNC's infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

246. Defendant PNC's infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 17**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against PNC)**

247. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

248. Defendant PNC has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent via the PNC System, which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.

249. Neither Defendant PNC nor its customers have a license or authority to use the '129 Patent.

250. As a result of Defendant PNC's indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

251. Defendant PNC's indirect induced infringement of the '129 patent has been willful under 35 U.S.C. § 284.

**COUNT 18**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against PNC)**

252. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

253. Defendant PNC has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the PNC System, which is used as a component of infringing systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

254. Neither Defendant PNC nor its customers have a license or authority to use the '129 Patent

255. As a result of Defendant PNC's indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

256. Defendant PNC's indirect contributory infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 19**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against U.S. Bank)**

257. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

258. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

259. Defendant U.S. Bank has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the U.S. Bank System in the United States.

260. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '129 Patent.

261. As a result of Defendant U.S. Bank's infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

262. Defendant U.S. Bank's infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 20**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against U.S. Bank)**

263. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

264. Defendant U.S. Bank has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent via the U.S. Bank System, which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.

265. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '129 Patent.

266. As a result of Defendant U.S. Bank's indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

267. Defendant U.S. Bank's indirect induced infringement of the '129 patent has been willful under 35 U.S.C. § 284.

**COUNT 21**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against U.S. Bank)**

268. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

269. Defendant U.S. Bank has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the U.S. Bank System, which is used as a component of infringing systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

270. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '129 Patent

271. As a result of Defendant U.S. Bank's indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**COUNT 22**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Wells Fargo)**

272. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

273. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

274. Defendant Wells Fargo has infringed claims 1-52 of the '129 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Wells Fargo System in the United States.

275. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '129 Patent.

276. As a result of Defendant Wells Fargo's infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

277. Defendant Wells Fargo's infringement of the '129 Patent has been willful under 35 U.S.C. § 284.

**COUNT 23**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Wells Fargo)**

278. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

279. Defendant Wells Fargo has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '129 Patent via the Wells Fargo System, which infringes the claims of the '129 Patent, thus inducing the infringement of the '129 Patent by others.



280. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '129 Patent.

281. As a result of Defendant Wells Fargo's indirect induced infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

282. Defendant Wells Fargo's indirect induced infringement of the '129 patent has been willful under 35 U.S.C. § 284.

**COUNT 24**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 8,281,129**  
**(Against Wells Fargo)**

283. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

284. Defendant Wells Fargo has indirectly infringed claims 1-52 of the '129 patent under 35 USC § 271(c) by providing the Wells Fargo System, which is used as a component of infringing systems which infringe the claims of the '129 Patent, thus contributing to the infringement of the '129 Patent.

285. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '129 Patent

286. As a result of Defendant Wells Fargo's indirect contributory infringement of the '129 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**INFRINGEMENT OF U.S. PATENT NO. 9,703,938**

**COUNT 25  
DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938  
(Against All Defendants – Zelle System)**

287. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

288. Each of the Defendants has infringed claims 1-26 of the '938 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Zelle System in the United States.

289. Neither Defendants nor their customers have a license or authority to use the '938 Patent.

290. As a result of each of the Defendants' infringement of the '938 Patent via the Zelle System, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

291. Defendants' infringement of the '938 Patent via the Zelle System has been willful under 35 U.S.C. § 284.

**COUNT 26  
INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938  
(Against All Defendants – Zelle System)**

292. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

293. Each of the Defendants has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938 Patent which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

294. Neither Defendants nor their customers have a license or authority to use the '938 Patent.

295. As a result of Defendants' indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

296. Defendants' indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 27**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against All Defendants – Zelle System)**

297. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

298. Each of the Defendants has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the Zelle System, which is used as a component of infringing systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.

299. Neither Defendants nor their customers have a license or authority to use the '938 Patent

300. As a result of Defendants' indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

301. Defendants' indirect contributory infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 28**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Bank of America)**

302. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

303. Defendant Bank of America has infringed claims 1-26 of the '938 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Bank of America System in the United States.

304. Neither Defendant Bank of America nor its customers have a license or authority to use the '938 Patent.

305. As a result of Defendant Bank of America's infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

306. Defendant Bank of America's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 29**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Bank of America)**

307. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

308. Defendant Bank of America has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938 Patent via the Bank of America System, which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

309. Neither Defendant Bank of America nor its customers have a license or authority to use the '938 Patent.

310. As a result of Defendant Bank of America's indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

311. Defendant Bank of America's indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 30**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Bank of America)**

312. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

313. Defendant Bank of America has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the Bank of America System, which is used as a component of infringing systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.

314. Neither Defendant Bank of America nor its customers have a license or authority to use the '938 Patent

315. As a result of Defendant Bank of America's indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

316. Defendant Bank of America's indirect contributory infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 31**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Truist)**

317. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

318. Defendant Truist has infringed claims 1-26 of the '938 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Truist System in the United States.

319. Neither Defendant Truist nor its customers have a license or authority to use the '938 Patent.

320. As a result of Defendant Truist's infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

321. Defendant Truist's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 32**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Truist)**

322. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

323. Defendant Truist has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938 Patent via the Truist System, which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

324. Neither Defendant Truist nor its customers have a license or authority to use the '938 Patent.

325. As a result of Defendant Truist's indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

326. Defendant Truist's indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 33**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Truist)**

327. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

328. Defendant Truist has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the Truist System, which is used as a component of infringing

systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.

329. Neither Defendant Truist nor its customers have a license or authority to use the '938 Patent

330. As a result of Defendant Truist's indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

331. Defendant Truist's indirect contributory infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 34**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Capital One)**

332. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

333. Defendant Capital One has infringed claims 1-26 of the '938 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Capital One System in the United States.

334. Neither Defendant Capital One nor its customers have a license or authority to use the '938 Patent.

335. As a result of Defendant Capital One's infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

336. Defendant Capital One's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 35**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Capital One)**

337. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

338. Defendant Capital One has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938 Patent via the Capital One System, which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

339. Neither Defendant Capital One nor its customers have a license or authority to use the '938 Patent.

340. As a result of Defendant Capital One's indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

341. Defendant Capital One's indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 36**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Capital One)**

342. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

343. Defendant Capital One has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the Capital One System, which is used as a component of infringing systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.



344. Neither Defendant Capital One nor its customers have a license or authority to use the '938 Patent

345. As a result of Defendant Capital One's indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

346. Defendant Capital One's indirect contributory infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 37**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against JPMorgan Chase)**

347. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

348. Defendant JPMorgan Chase has infringed claims 1-26 of the '938 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the JPMorgan Chase System in the United States.

349. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '938 Patent.

350. As a result of Defendant JPMorgan Chase's infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

351. Defendant JPMorgan Chase's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 38**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against JPMorgan Chase)**

352. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

353. Defendant JPMorgan Chase has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938 Patent via the JPMorgan Chase System, which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

354. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '938 Patent.

355. As a result of Defendant JPMorgan Chase's indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

356. Defendant JPMorgan Chase's indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 39**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against JPMorgan Chase)**

357. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

358. Defendant JPMorgan Chase has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the JPMorgan Chase System, which is used as a component of infringing systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.

359. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '938 Patent

360. As a result of Defendant JPMorgan Chase's indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

361. Defendant JPMorgan Chase's indirect contributory infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 40**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against PNC)**

362. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

363. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

364. Defendant PNC has infringed claims 1-26 of the '938 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the PNC System in the United States.

365. Neither Defendant PNC nor its customers have a license or authority to use the '938 Patent.

366. As a result of Defendant PNC's infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

367. Defendant PNC's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 41**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against PNC)**

368. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

369. Defendant PNC has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938

Patent via the PNC System, which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

370. Neither Defendant PNC nor its customers have a license or authority to use the '938 Patent.

371. As a result of Defendant PNC's indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

372. Defendant PNC's indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 42**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against PNC)**

373. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

374. Defendant PNC has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the PNC System, which is used as a component of infringing systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.

375. Neither Defendant PNC nor its customers have a license or authority to use the '938 Patent

376. As a result of Defendant PNC's indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

377. Defendant PNC's indirect contributory infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 43**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against U.S. Bank)**

378. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

379. Defendant U.S. Bank has infringed claims 1-26 of the '938 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the U.S. Bank System in the United States.

380. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '938 Patent.

381. As a result of Defendant U.S. Bank's infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

382. Defendant U.S. Bank's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 44**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against U.S. Bank)**

383. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

384. Defendant U.S. Bank has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938 Patent via the U.S. Bank System, which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

385. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '938 Patent.

386. As a result of Defendant U.S. Bank's indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

387. Defendant U.S. Bank's indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 45**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against U.S. Bank)**

388. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

389. Defendant U.S. Bank has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the U.S. Bank System, which is used as a component of infringing systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.

390. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '938 Patent

391. As a result of Defendant U.S. Bank's indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**COUNT 46**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Wells Fargo)**

392. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

393. Defendant Wells Fargo has infringed claims 1-26 of the '938 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Wells Fargo System in the United States.

394. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '938 Patent.

395. As a result of Defendant Wells Fargo's infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

396. Defendant Wells Fargo's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 47**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Wells Fargo)**

397. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

398. Defendant Wells Fargo has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '938 Patent via the Wells Fargo System, which infringes the claims of the '938 Patent, thus inducing the infringement of the '938 Patent by others.

399. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '938 Patent.

400. As a result of Defendant Wells Fargo's indirect induced infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

401. Defendant Wells Fargo's indirect induced infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 48**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,703,938**  
**(Against Wells Fargo)**

402. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

403. Defendant Wells Fargo has indirectly infringed claims 1-26 of the '938 Patent under 35 USC § 271(c) by providing the Wells Fargo System, which is used as a component of infringing systems which infringe the claims of the '938 Patent, thus contributing to the infringement of the '938 Patent.

404. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '938 Patent

405. As a result of Defendant Wells Fargo's indirect contributory infringement of the '938 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**INFRINGEMENT OF U.S. PATENT NO. 9,727,864**

**COUNT 49**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against All Defendants – Zelle System)**

406. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

407. Each of the Defendants has infringed claims 1-15 of the '864 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Zelle System in the United States.

408. Neither Defendants nor their customers have a license or authority to use the '864 Patent.



409. As a result of each of the Defendants' infringement of the '864 Patent via the Zelle System, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

410. Defendants' infringement of the '864 Patent via the Zelle System has been willful under 35 U.S.C. § 284.

**COUNT 50**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against All Defendants – Zelle System)**

411. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

412. Each of the Defendants has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

413. Neither Defendants nor their customers have a license or authority to use the '864 Patent.

414. As a result of Defendants' indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

415. Defendants' indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 51**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against All Defendants – Zelle System)**

416. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

417. Each of the Defendants has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the Zelle System, which is used as a component of infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

418. Neither Defendants nor their customers have a license or authority to use the '864 Patent

419. As a result of Defendants' indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

420. Defendants' indirect contributory infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 52**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Bank of America)**

421. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

422. Defendant Bank of America has infringed claims 1-15 of the '864 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Bank of America System in the United States.

423. Neither Defendant Bank of America nor its customers have a license or authority to use the '864 Patent.

424. As a result of Defendant Bank of America's infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

425. Defendant Bank of America's infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 53**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Bank of America)**

426. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

427. Defendant Bank of America has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent via the Bank of America System, which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

428. Neither Defendant Bank of America nor its customers have a license or authority to use the '864 Patent.

429. As a result of Defendant Bank of America's indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

430. Defendant Bank of America's indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 54**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Bank of America)**

431. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

432. Defendant Bank of America has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the Bank of America System, which is used as a component of infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

433. Neither Defendant Bank of America nor its customers have a license or authority to use the '864 Patent

434. As a result of Defendant Bank of America's indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

435. Defendant Bank of America's indirect contributory infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 55**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Truist)**

436. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

437. Defendant Truist has infringed claims 1-15 of the '864 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Truist System in the United States.

438. Neither Defendant Truist nor its customers have a license or authority to use the '864 Patent.

439. As a result of Defendant Truist's infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

440. Defendant Truist's infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 56**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Truist)**

441. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

442. Defendant Truist has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent via the Truist System, which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

443. Neither Defendant Truist nor its customers have a license or authority to use the '864 Patent.

444. As a result of Defendant Truist's indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

445. Defendant Truist's indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 57**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Truist)**

446. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

447. Defendant Truist has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the Truist System, which is used as a component of infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

448. Neither Defendant Truist nor its customers have a license or authority to use the '864 Patent

449. As a result of Defendant Truist's indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

450. Defendant Truist's indirect contributory infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 58**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Capital One)**

451. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

452. Defendant Capital One has infringed claims 1-15 of the '864 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Capital One System in the United States.

453. Neither Defendant Capital One nor its customers have a license or authority to use the '864 Patent.

454. As a result of Defendant Capital One's infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

455. Defendant Capital One's infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 59**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Capital One)**

456. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

457. Defendant Capital One has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent via the Capital One System, which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

458. Neither Defendant Capital One nor its customers have a license or authority to use the '864 Patent.

459. As a result of Defendant Capital One's indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

460. Defendant Capital One's indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 60**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Capital One)**

461. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

462. Defendant Capital One has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the Capital One System, which is used as a component of infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

463. Neither Defendant Capital One nor its customers have a license or authority to use the '864 Patent

464. As a result of Defendant Capital One's indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

465. Defendant Capital One's indirect contributory infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 61**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against JPMorgan Chase)**

466. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

467. Defendant JPMorgan Chase has infringed claims 1-15 of the '864 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the JPMorgan Chase System in the United States.

468. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '864 Patent.

469. As a result of Defendant JPMorgan Chase's infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

470. Defendant JPMorgan Chase's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 62**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against JPMorgan Chase)**

471. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

472. Defendant JPMorgan Chase has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent via the JPMorgan Chase System, which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

473. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '864 Patent.



474. As a result of Defendant JPMorgan Chase's indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

475. Defendant JPMorgan Chase's indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 63**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against JPMorgan Chase)**

476. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

477. Defendant JPMorgan Chase has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the JPMorgan Chase System, which is used as a component of infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

478. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '864 Patent

479. As a result of Defendant JPMorgan Chase's indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

480. Defendant JPMorgan Chase's indirect contributory infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 64**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against PNC)**

481. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

482. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

483. Defendant PNC has infringed claims 1-15 of the '864 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the PNC System in the United States.

484. Neither Defendant PNC nor its customers have a license or authority to use the '864 Patent.

485. As a result of Defendant PNC's infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

486. Defendant PNC's infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 65**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against PNC)**

487. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

488. Defendant PNC has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent via the PNC System, which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

489. Neither Defendant PNC nor its customers have a license or authority to use the '864 Patent.

490. As a result of Defendant PNC's indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

491. Defendant PNC's indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 66**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against PNC)**

492. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

493. Defendant PNC has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the PNC System, which is used as a component of infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

494. Neither Defendant PNC nor its customers have a license or authority to use the '864 Patent

495. As a result of Defendant PNC's indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

496. Defendant PNC's indirect contributory infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 67**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against U.S. Bank)**

497. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

498. Defendant U.S. Bank has infringed claims 1-15 of the '864 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the U.S. Bank System in the United States.

499. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '864 Patent.

500. As a result of Defendant U.S. Bank's infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

501. Defendant U.S. Bank's infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 68**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against U.S. Bank)**

502. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

503. Defendant U.S. Bank has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent via the U.S. Bank System, which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

504. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '864 Patent.

505. As a result of Defendant U.S. Bank's indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

506. Defendant U.S. Bank's indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 69**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against U.S. Bank)**

507. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

508. Defendant U.S. Bank has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the U.S. Bank System, which is used as a component of infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

509. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '864 Patent

510. As a result of Defendant U.S. Bank's indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**COUNT 70**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(AGAINST WELLS FARGO)**

511. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

512. Defendant Wells Fargo has infringed claims 1-15 of the '864 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Wells Fargo System in the United States.

513. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '864 Patent.

514. As a result of Defendant Wells Fargo's infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

515. Defendant Wells Fargo's infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 71**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(AGAINST WELLS FARGO)**

516. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

517. Defendant Wells Fargo has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '864 Patent via the Wells Fargo System, which infringes the claims of the '864 Patent, thus inducing the infringement of the '864 Patent by others.

518. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '864 Patent.

519. As a result of Defendant Wells Fargo's indirect induced infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

520. Defendant Wells Fargo's indirect induced infringement of the '864 Patent has been willful under 35 U.S.C. § 284.

**COUNT 72**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,727,864**  
**(Against Wells Fargo)**

521. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

522. Defendant Wells Fargo has indirectly infringed claims 1-15 of the '864 Patent under 35 USC § 271(c) by providing the Wells Fargo System, which is used as a component of

infringing systems which infringe the claims of the '864 Patent, thus contributing to the infringement of the '864 Patent.

523. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '864 Patent

524. As a result of Defendant Wells Fargo's indirect contributory infringement of the '864 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**INFRINGEMENT OF U.S. PATENT NO. 9,870,453**

**COUNT 73**

**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453  
(Against All Defendants – Zelle System)**

525. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

526. Each of the Defendants has infringed claims 1-26 of the '453 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Zelle System in the United States.

527. Neither Defendants nor their customers have a license or authority to use the '453 Patent.

528. As a result of each of the Defendants' infringement of the '453 Patent via the Zelle System, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

529. Defendants' infringement of the '453 Patent via the Zelle System has been willful under 35 U.S.C. § 284.

**COUNT 74**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against All Defendants – Zelle System)**

530. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

531. Each of the Defendants has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '453 Patent which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

532. Neither Defendants nor their customers have a license or authority to use the '453 Patent.

533. As a result of Defendants' indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

534. Defendants' indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 75**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against All Defendants – Zelle System)**

535. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

536. Each of the Defendants has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the Zelle System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

537. Neither Defendants nor their customers have a license or authority to use the '453 Patent



538. As a result of Defendants' indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

539. Defendants' indirect contributory infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 76**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Bank of America)**

540. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

541. Defendant Bank of America has infringed claims 1-26 of the '453 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Bank of America System in the United States.

542. Neither Defendant Bank of America nor its customers have a license or authority to use the '453 Patent.

543. As a result of Defendant Bank of America's infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

544. Defendant Bank of America's infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 77**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Bank of America)**

545. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

546. Defendant Bank of America has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system

claimed in the '453 Patent via the Bank of America System, which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

547. Neither Defendant Bank of America nor its customers have a license or authority to use the '453 Patent.

548. As a result of Defendant Bank of America's indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

549. Defendant Bank of America's indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 78**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Bank of America)**

550. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

551. Defendant Bank of America has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the Bank of America System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

552. Neither Defendant Bank of America nor its customers have a license or authority to use the '453 Patent

553. As a result of Defendant Bank of America's indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

554. Defendant Bank of America's indirect contributory infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 79**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Truist)**

555. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

556. Defendant Truist has infringed claims 1-26 of the '453 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Truist System in the United States.

557. Neither Defendant Truist nor its customers have a license or authority to use the '453 Patent.

558. As a result of Defendant Truist's infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

559. Defendant Truist's infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 80**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Truist)**

560. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

561. Defendant Truist has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '453 Patent via the Truist System, which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

562. Neither Defendant Truist nor its customers have a license or authority to use the '453 Patent.

563. As a result of Defendant Truist's indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

564. Defendant Truist's indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 81**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Truist)**

565. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

566. Defendant Truist has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the Truist System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

567. Neither Defendant Truist nor its customers have a license or authority to use the '453 Patent

568. As a result of Defendant Truist's indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

569. Defendant Truist's indirect contributory infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 82**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Capital One)**

570. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

571. Defendant Capital One has infringed claims 1-26 of the '453 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Capital One System in the United States.

572. Neither Defendant Capital One nor its customers have a license or authority to use the '453 Patent.

573. As a result of Defendant Capital One's infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

574. Defendant Capital One's infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 83**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Capital One)**

575. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

576. Defendant Capital One has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '453 Patent via the Capital One System, which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

577. Neither Defendant Capital One nor its customers have a license or authority to use the '453 Patent.

578. As a result of Defendant Capital One's indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

579. Defendant Capital One's indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 84**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Capital One)**

580. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

581. Defendant Capital One has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the Capital One System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

582. Neither Defendant Capital One nor its customers have a license or authority to use the '453 Patent

583. As a result of Defendant Capital One's indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

584. Defendant Capital One's indirect contributory infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 85**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against JPMorgan Chase)**

585. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

586. Defendant JPMorgan Chase has infringed claims 1-26 of the '453 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the JPMorgan Chase System in the United States.

587. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '453 Patent.

588. As a result of Defendant JPMorgan Chase's infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

589. Defendant JPMorgan Chase's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 86**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against JPMorgan Chase)**

590. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

591. Defendant JPMorgan Chase has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '453 Patent via the JPMorgan Chase System, which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

592. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '453 Patent.

593. As a result of Defendant JPMorgan Chase's indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

594. Defendant JPMorgan Chase's indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 87**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against JPMorgan Chase)**

595. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

596. Defendant JPMorgan Chase has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the JPMorgan Chase System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

597. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '453 Patent

598. As a result of Defendant JPMorgan Chase's indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

599. Defendant JPMorgan Chase's indirect contributory infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 88**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against PNC)**

600. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

601. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

602. Defendant PNC has infringed claims 1-26 of the '453 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the PNC System in the United States.

603. Neither Defendant PNC nor its customers have a license or authority to use the '453 Patent.

604. As a result of Defendant PNC's infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.



605. Defendant PNC's infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 89**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against PNC)**

606. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

607. Defendant PNC has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '453 Patent via the PNC System, which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

608. Neither Defendant PNC nor its customers have a license or authority to use the '453 Patent.

609. As a result of Defendant PNC's indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

610. Defendant PNC's indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 90**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against PNC)**

611. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

612. Defendant PNC has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the PNC System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

613. Neither Defendant PNC nor its customers have a license or authority to use the '453 Patent

614. As a result of Defendant PNC's indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

615. Defendant PNC's indirect contributory infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 91**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against U.S. Bank)**

616. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

617. Defendant U.S. Bank has infringed claims 1-26 of the '453 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the U.S. Bank System in the United States.

618. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '453 Patent.

619. As a result of Defendant U.S. Bank's infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

620. Defendant U.S. Bank's infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 92**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against U.S. Bank)**

621. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

622. Defendant U.S. Bank has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '453 Patent via the U.S. Bank System, which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

623. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '453 Patent.

624. As a result of Defendant U.S. Bank's indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

625. Defendant U.S. Bank's indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 93**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against U.S. Bank)**

626. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

627. Defendant U.S. Bank has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the U.S. Bank System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

628. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '453 Patent

629. As a result of Defendant U.S. Bank's indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**COUNT 94**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(AGAINST WELLS FARGO)**

630. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

631. Defendant Wells Fargo has infringed claims 1-26 of the '453 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Wells Fargo System in the United States.

632. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '453 Patent.

633. As a result of Defendant Wells Fargo's infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

634. Defendant Wells Fargo's infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 95**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(AGAINST WELLS FARGO)**

635. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

636. Defendant Wells Fargo has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '453 Patent via the Wells Fargo System, which infringes the claims of the '453 Patent, thus inducing the infringement of the '453 Patent by others.

637. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '453 Patent.

638. As a result of Defendant Wells Fargo's indirect induced infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

639. Defendant Wells Fargo's indirect induced infringement of the '453 Patent has been willful under 35 U.S.C. § 284.

**COUNT 96**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 9,870,453**  
**(Against Wells Fargo)**

640. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

641. Defendant Wells Fargo has indirectly infringed claims 1-26 of the '453 Patent under 35 USC § 271(c) by providing the Wells Fargo System, which is used as a component of infringing systems which infringe the claims of the '453 Patent, thus contributing to the infringement of the '453 Patent.

642. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '453 Patent

643. As a result of Defendant Wells Fargo's indirect contributory infringement of the '453 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**INFRINGEMENT OF U.S. PATENT NO. 10,083,285**

**COUNT 97**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against All Defendants – Zelle System)**

644. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

645. Each of the Defendants has infringed claims 1-30 of the '285 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Zelle System in the United States.

646. Neither Defendants nor their customers have a license or authority to use the '285 Patent.

647. As a result of each of the Defendants' infringement of the '285 Patent via the Zelle System, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

648. Defendants' infringement of the '285 Patent via the Zelle System has been willful under 35 U.S.C. § 284.

**COUNT 98**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against All Defendants – Zelle System)**

649. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

650. Each of the Defendants has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '285 Patent which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

651. Neither Defendants nor their customers have a license or authority to use the '285 Patent.

652. As a result of Defendants' indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

653. Defendants' indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 99**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against All Defendants – Zelle System)**

654. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

655. Each of the Defendants has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the Zelle System, which is used as a component of infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

656. Neither Defendants nor their customers have a license or authority to use the '285 Patent

657. As a result of Defendants' indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

658. Defendants' indirect contributory infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 100**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Bank of America)**

659. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

660. Defendant Bank of America has infringed claims 1-30 of the '285 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Bank of America System in the United States.

661. Neither Defendant Bank of America nor its customers have a license or authority to use the '285 Patent.

662. As a result of Defendant Bank of America's infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

663. Defendant Bank of America's infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 101**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Bank of America)**

664. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

665. Defendant Bank of America has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '285 Patent via the Bank of America System, which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

666. Neither Defendant Bank of America nor its customers have a license or authority to use the '285 Patent.

667. As a result of Defendant Bank of America's indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

668. Defendant Bank of America's indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 102**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Bank of America)**

669. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.



670. Defendant Bank of America has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the Bank of America System, which is used as a component of infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

671. Neither Defendant Bank of America nor its customers have a license or authority to use the '285 Patent

672. As a result of Defendant Bank of America's indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

673. Defendant Bank of America's indirect contributory infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 103**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Truist)**

674. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

675. Defendant Truist has infringed claims 1-30 of the '285 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Truist System in the United States.

676. Neither Defendant Truist nor its customers have a license or authority to use the '285 Patent.

677. As a result of Defendant Truist's infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

678. Defendant Truist's infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 104**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Truist)**

679. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

680. Defendant Truist has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '285 Patent via the Truist System, which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

681. Neither Defendant Truist nor its customers have a license or authority to use the '285 Patent.

682. As a result of Defendant Truist's indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

683. Defendant Truist's indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 105**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Truist)**

684. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

685. Defendant Truist has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the Truist System, which is used as a component of infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

686. Neither Defendant Truist nor its customers have a license or authority to use the '285 Patent

687. As a result of Defendant Truist's indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

688. Defendant Truist's indirect contributory infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 106**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Capital One)**

689. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

690. Defendant Capital One has infringed claims 1-30 of the '285 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Capital One System in the United States.

691. Neither Defendant Capital One nor its customers have a license or authority to use the '285 Patent.

692. As a result of Defendant Capital One's infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

693. Defendant Capital One's infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 107**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Capital One)**

694. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

695. Defendant Capital One has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in

the '285 Patent via the Capital One System, which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

696. Neither Defendant Capital One nor its customers have a license or authority to use the '285 Patent.

697. As a result of Defendant Capital One's indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

698. Defendant Capital One's indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 108**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Capital One)**

699. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

700. Defendant Capital One has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the Capital One System, which is used as a component of infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

701. Neither Defendant Capital One nor its customers have a license or authority to use the '285 Patent

702. As a result of Defendant Capital One's indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

703. Defendant Capital One's indirect contributory infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 109**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against JPMorgan Chase)**

704. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

705. Defendant JPMorgan Chase has infringed claims 1-30 of the '285 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the JPMorgan Chase System in the United States.

706. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '285 Patent.

707. As a result of Defendant JPMorgan Chase's infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

708. Defendant JPMorgan Chase's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 110**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against JPMorgan Chase)**

709. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

710. Defendant JPMorgan Chase has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '285 Patent via the JPMorgan Chase System, which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

711. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '285 Patent.

712. As a result of Defendant JPMorgan Chase's indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

713. Defendant JPMorgan Chase's indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 111**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against JPMorgan Chase)**

714. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

715. Defendant JPMorgan Chase has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the JPMorgan Chase System, which is used as a component of infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

716. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '285 Patent

717. As a result of Defendant JPMorgan Chase's indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

718. Defendant JPMorgan Chase's indirect contributory infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 112**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against PNC)**

719. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

720. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

721. Defendant PNC has infringed claims 1-30 of the '285 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the PNC System in the United States.

722. Neither Defendant PNC nor its customers have a license or authority to use the '285 Patent.

723. As a result of Defendant PNC's infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

724. Defendant PNC's infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 113  
INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285  
(Against PNC)**

725. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

726. Defendant PNC has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '285 Patent via the PNC System, which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

727. Neither Defendant PNC nor its customers have a license or authority to use the '285 Patent.

728. As a result of Defendant PNC's indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

729. Defendant PNC's indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 114**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against PNC)**

730. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

731. Defendant PNC has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the PNC System, which is used as a component of infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

732. Neither Defendant PNC nor its customers have a license or authority to use the '285 Patent

733. As a result of Defendant PNC's indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

734. Defendant PNC's indirect contributory infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 115**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against U.S. Bank)**

735. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

736. Defendant U.S. Bank has infringed claims 1-30 of the '285 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the U.S. Bank System in the United States.



737. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '285 Patent.

738. As a result of Defendant U.S. Bank's infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

739. Defendant U.S. Bank's infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 116**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against U.S. Bank)**

740. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

741. Defendant U.S. Bank has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '285 Patent via the U.S. Bank System, which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

742. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '285 Patent.

743. As a result of Defendant U.S. Bank's indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

744. Defendant U.S. Bank's indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 117**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against U.S. Bank)**

745. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

746. Defendant U.S. Bank has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the U.S. Bank System, which is used as a component of infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

747. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '285 Patent

748. As a result of Defendant U.S. Bank's indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**COUNT 118**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(AGAINST WELLS FARGO)**

749. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

750. Defendant Wells Fargo has infringed claims 1-30 of the '285 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Wells Fargo System in the United States.

751. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '285 Patent.

752. As a result of Defendant Wells Fargo's infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

753. Defendant Wells Fargo's infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 119**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(AGAINST WELLS FARGO)**

754. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

755. Defendant Wells Fargo has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '285 Patent via the Wells Fargo System, which infringes the claims of the '285 Patent, thus inducing the infringement of the '285 Patent by others.

756. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '285 Patent.

757. As a result of Defendant Wells Fargo's indirect induced infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

758. Defendant Wells Fargo's indirect induced infringement of the '285 Patent has been willful under 35 U.S.C. § 284.

**COUNT 120**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,083,285**  
**(Against Wells Fargo)**

759. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

760. Defendant Wells Fargo has indirectly infringed claims 1-30 of the '285 Patent under 35 USC § 271(c) by providing the Wells Fargo System, which is used as a component of

infringing systems which infringe the claims of the '285 Patent, thus contributing to the infringement of the '285 Patent.

761. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '285 Patent

762. As a result of Defendant Wells Fargo's indirect contributory infringement of the '285 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**INFRINGEMENT OF U.S. PATENT NO. 10,769,297**

**COUNT 121**

**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297  
(Against All Defendants – Zelle System)**

763. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

764. Each of the Defendants has infringed claims 1-29 of the '297 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Zelle System in the United States.

765. Neither Defendants nor their customers have a license or authority to use the '297 Patent.

766. As a result of each of the Defendants' infringement of the '297 Patent via the Zelle System, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

767. Defendants' infringement of the '297 Patent via the Zelle System has been willful under 35 U.S.C. § 284.

**COUNT 122**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against All Defendants – Zelle System)**

768. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

769. Each of the Defendants has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '297 Patent which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

770. Neither Defendants nor their customers have a license or authority to use the '297 Patent.

771. As a result of Defendants' indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

772. Defendants' indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 123**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against All Defendants – Zelle System)**

773. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

774. Each of the Defendants has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the Zelle System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

775. Neither Defendants nor their customers have a license or authority to use the '297 Patent

776. As a result of Defendants' indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

777. Defendants' indirect contributory infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 124**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Bank of America)**

778. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

779. Defendant Bank of America has infringed claims 1-29 of the '297 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Bank of America System in the United States.

780. Neither Defendant Bank of America nor its customers have a license or authority to use the '297 Patent.

781. As a result of Defendant Bank of America's infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

782. Defendant Bank of America's infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 125**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Bank of America)**

783. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

784. Defendant Bank of America has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system

claimed in the '297 Patent via the Bank of America System, which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

785. Neither Defendant Bank of America nor its customers have a license or authority to use the '297 Patent.

786. As a result of Defendant Bank of America's indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

787. Defendant Bank of America's indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 126**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Bank of America)**

788. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

789. Defendant Bank of America has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the Bank of America System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

790. Neither Defendant Bank of America nor its customers have a license or authority to use the '297 Patent

791. As a result of Defendant Bank of America's indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

792. Defendant Bank of America's indirect contributory infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 127**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Truist)**

793. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

794. Defendant Truist has infringed claims 1-29 of the '297 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Truist System in the United States.

795. Neither Defendant Truist nor its customers have a license or authority to use the '297 Patent.

796. As a result of Defendant Truist's infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

797. Defendant Truist's infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 128**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Truist)**

798. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

799. Defendant Truist has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '297 Patent via the Truist System, which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

800. Neither Defendant Truist nor its customers have a license or authority to use the '297 Patent.



801. As a result of Defendant Truist's indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

802. Defendant Truist's indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 129**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Truist)**

803. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

804. Defendant Truist has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the Truist System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

805. Neither Defendant Truist nor its customers have a license or authority to use the '297 Patent

806. As a result of Defendant Truist's indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

807. Defendant Truist's indirect contributory infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 130**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Capital One)**

808. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

809. Defendant Capital One has infringed claims 1-29 of the '297 Patent under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Capital One System in the United States.

810. Neither Defendant Capital One nor its customers have a license or authority to use the '297 Patent.

811. As a result of Defendant Capital One's infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

812. Defendant Capital One's infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 131**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Capital One)**

813. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

814. Defendant Capital One has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '297 Patent via the Capital One System, which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

815. Neither Defendant Capital One nor its customers have a license or authority to use the '297 Patent.

816. As a result of Defendant Capital One's indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

817. Defendant Capital One's indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 132**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Capital One)**

818. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

819. Defendant Capital One has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the Capital One System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

820. Neither Defendant Capital One nor its customers have a license or authority to use the '297 Patent

821. As a result of Defendant Capital One's indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

822. Defendant Capital One's indirect contributory infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 133**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against JPMorgan Chase)**

823. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

824. Defendant JPMorgan Chase has infringed claims 1-29 of the '297 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the JPMorgan Chase System in the United States.

825. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '297 Patent.

826. As a result of Defendant JPMorgan Chase's infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

827. Defendant JPMorgan Chase's infringement of the '938 Patent has been willful under 35 U.S.C. § 284.

**COUNT 134**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against JPMorgan Chase)**

828. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

829. Defendant JPMorgan Chase has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '297 Patent via the JPMorgan Chase System, which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

830. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '297 Patent.

831. As a result of Defendant JPMorgan Chase's indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

832. Defendant JPMorgan Chase's indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 135**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against JPMorgan Chase)**

833. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

834. Defendant JPMorgan Chase has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the JPMorgan Chase System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

835. Neither Defendant JPMorgan Chase nor its customers have a license or authority to use the '297 Patent

836. As a result of Defendant JPMorgan Chase's indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

837. Defendant JPMorgan Chase's indirect contributory infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 136**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against PNC)**

838. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

839. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

840. Defendant PNC has infringed claims 1-29 of the '297 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the PNC System in the United States.

841. Neither Defendant PNC nor its customers have a license or authority to use the '297 Patent.

842. As a result of Defendant PNC's infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

843. Defendant PNC's infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 137**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against PNC)**

844. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

845. Defendant PNC has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '297 Patent via the PNC System, which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

846. Neither Defendant PNC nor its customers have a license or authority to use the '297 Patent.

847. As a result of Defendant PNC's indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

848. Defendant PNC's indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 138**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against PNC)**

849. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

850. Defendant PNC has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the PNC System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

851. Neither Defendant PNC nor its customers have a license or authority to use the '297 Patent

852. As a result of Defendant PNC's indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

853. Defendant PNC's indirect contributory infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 139**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against U.S. Bank)**

854. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

855. Defendant U.S. Bank has infringed claims 1-29 of the '297 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the U.S. Bank System in the United States.

856. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '297 Patent.

857. As a result of Defendant U.S. Bank's infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

858. Defendant U.S. Bank's infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 140**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against U.S. Bank)**

859. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

860. Defendant U.S. Bank has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '297 Patent via the U.S. Bank System, which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

861. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '297 Patent.

862. As a result of Defendant U.S. Bank's indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

863. Defendant U.S. Bank's indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 141**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against U.S. Bank)**

864. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

865. Defendant U.S. Bank has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the U.S. Bank System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

866. Neither Defendant U.S. Bank nor its customers have a license or authority to use the '297 Patent

867. As a result of Defendant U.S. Bank's indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.



**COUNT 142**  
**DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(AGAINST WELLS FARGO)**

868. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

869. Defendant Wells Fargo has infringed claims 1-29 of the '297 Patent, under 35 U.S.C. § 271(a), by making, using, offering to sell, selling and importing the Wells Fargo System in the United States.

870. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '297 Patent.

871. As a result of Defendant Wells Fargo's infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

872. Defendant Wells Fargo's infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 143**  
**INDIRECT INDUCED INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(AGAINST WELLS FARGO)**

873. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

874. Defendant Wells Fargo has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(b) by inducing others to perform the method and use the system claimed in the '297 Patent via the Wells Fargo System, which infringes the claims of the '297 Patent, thus inducing the infringement of the '297 Patent by others.

875. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '297 Patent.

876. As a result of Defendant Wells Fargo's indirect induced infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

877. Defendant Wells Fargo's indirect induced infringement of the '297 Patent has been willful under 35 U.S.C. § 284.

**COUNT 144**  
**INDIRECT CONTRIBUTORY INFRINGEMENT OF U.S. PATENT NO. 10,769,297**  
**(Against Wells Fargo)**

878. The allegations of each of the paragraphs above are hereby re-alleged and incorporated herein by reference.

879. Defendant Wells Fargo has indirectly infringed claims 1-29 of the '297 Patent under 35 USC § 271(c) by providing the Wells Fargo System, which is used as a component of infringing systems which infringe the claims of the '297 Patent, thus contributing to the infringement of the '297 Patent.

880. Neither Defendant Wells Fargo nor its customers have a license or authority to use the '297 Patent

881. As a result of Defendant Wells Fargo's indirect contributory infringement of the '297 Patent, Plaintiff has suffered damages in an amount not yet determined, of at least a reasonable royalty.

**PRAYER FOR RELIEF**

A. For a judgement declaring that Defendants have infringed each of the Patents-in-Suit.

B. For a judgment declaring that Defendants' infringement of the Patents-in-Suit has been willful and for enhancement of damages in accordance with 35 U.S.C. 284;

C. For a judgment awarding Plaintiff compensatory damages as a result of Defendants' infringement sufficient to reasonably and entirely compensate Plaintiff for infringement of the Patents-in-Suit in an amount to be determined;

D. For a judgment declaring that this case is exceptional and awarding Plaintiff its expenses, costs and attorneys' fees in accordance with 35 U.S.C. § 285 and Rule 54(d) of the Federal Rules of Civil Procedure;

E. For a judgment awarding Plaintiff prejudgment interest pursuant to 35 U.S.C. § 284, and a further award of post-judgment interest, pursuant to 28 U.S.C. § 1961, continuing until such judgment is paid;

F. For a judgment awarding Plaintiff enhanced damages under 35 U.S.C. § 284; and

G. For such other relief to which Plaintiff is entitled under the applicable United States laws and regulations or as this Court deems just and proper.

### **DEMAND FOR JURY TRIAL**

Pursuant to the Federal Rules of Civil Procedure Rule 38(b), Plaintiff hereby demands trial by jury as to all claims in this litigation.

Dated: July 9, 2024

Respectfully submitted,

/s/ Joseph J. Zito

Joseph J. Zito

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