

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

AMADORA SYSTEMS LLC,

Plaintiff

v.

FROST BANK,

Defendant

Case No. 6:24-cv-616

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Amadora Systems LLC (“Plaintiff”) hereby files this Original Complaint for Patent Infringement against Defendant Frost Bank (“Frost” or “Defendant”), and alleges, upon information and belief, as follows:

THE PARTIES

1. Amadora Systems LLC is a Domestic Limited Liability Company organized and existing under the laws of the State of Texas with its principal place of business at 119 West Ferguson Street, Suite B, Tyler, Texas 75702.
2. Upon information and belief, Defendant is a Texas State Financial Institution organized and existing under the laws of the State of Texas, with a principal place of business located at 111 West Houston Street, San Antonio, Texas 78205. Defendant may be served through its registered agent in the State of Texas at Corporation Service Company dba CSC - Lawyers Incorporating Service Company, 211 East 7th Street, Suite 620, Austin, Texas 78701. On information and belief, in its extensive role as a consumer and business financial institution (whether Commercial Bank, Thrift,

or Credit Union), Frost makes, uses, sells, offers to sell, and otherwise provides financial account and/or depository services (including but not limited to credit cards, debit cards, checking accounts, savings accounts, and personal and business loans) to consumers throughout the State of Texas, including in this judicial District, and introduces such services into the stream of commerce knowing and intending that they would be extensively used in the State of Texas and in this judicial District. Moreover, as an integral component of its services, Frost owns, operates, or otherwise provides branded Automated Teller Machines for the use and benefit of its customers within the State of Texas, and within this judicial District (the “Frost ATM Machines”). On information and belief, Frost specifically targets customers in the State of Texas and in this judicial District.

3. On information and belief, Defendant is compliant with the provisions of Title 12 of the Code of Federal Regulations, Chapter II, Subchapter A, Part 208.61, which comprises procedures enacted by the Federal Reserve System. On information and belief, such compliance includes at least the adoption on the part of Frost of appropriate security procedures to discourage robberies, burglaries, and larcenies, and to assist in the identification and prosecution of persons who commit such acts. On information and belief, one aspect of such compliance is the incorporation of video and/or audio security surveillance systems at certain of the Frost ATM Machines.
4. On information and belief, Defendant is compliant with the provisions of Title 12 of the Code of Federal Regulations, Chapter III, Subchapter B, Part 326.3, which comprises procedures enacted by the Federal Deposit Insurance Corporation. On information and belief, such compliance includes at least the establishment on the part of Frost of appropriate security procedures for assisting in identifying persons committing crimes against the institution and that will preserve evidence that may aid in their identification and prosecution. On information and belief, one aspect of such compliance is the incorporation of video and/or audio security surveillance systems at

certain of the Frost ATM Machines, including for the purpose of retaining a record of any robbery, burglary, or larceny.

5. On information and belief, Defendant is compliant with the provisions of Title 12 of the Code of Federal Regulations, Chapter I, Part 21, which comprises procedures enacted by the Department of the Treasury. On information and belief, such compliance includes at least the establishment on the part of Frost of appropriate security procedures for assisting in identifying persons committing crimes against the institution and that will preserve evidence that may aid in their identification and prosecution. On information and belief, one aspect of such compliance is the incorporation of video and/or audio security surveillance systems at certain of the Frost ATM Machines, including for the purpose of retaining a record of any robbery, burglary, or larceny.
6. On information and belief, Defendant is compliant with local laws enacted by jurisdictions in which it conducts business. By way of example, to the extent Frost conducts business in the State of New York, Frost is believed to be compliant with Title 3, Section 301.5 of the New York Codes, Rules, and Regulations, which requires all banking institutions to maintain a surveillance camera or cameras, which shall view and record all persons entering an automated teller machine facility located within the interior of a building, or which shall view and record all activity occurring within a minimum of three feet in front of an automated teller machine located outside a building and open to the outdoor air. On information and belief, certain of the Frost ATM Machines include compliant video and/or audio security surveillance systems.
7. On information and belief, Defendant is compliant with local laws enacted by jurisdictions in which it conducts business. By way of example, to the extent Frost conducts business in the State of Texas, Frost is believed to be compliant with Title 3, Subtitle A, Chapter 31 of the Texas Finance Code, including specifically Section 59.310 thereof, which requires the Texas Finance

Commission to adopt and enforce rules governing the security requirements for unmanned teller machines. On information and belief, certain of the Frost ATM Machines include compliant video and/or audio security surveillance systems.

8. On information and belief, certain of the Frost ATM Machines comprise built-in cameras which serve the purposes of recording evidence in case of a mugging or other crime, monitoring people who might be up to no good, and enhancing security measures to prevent ATM fraud and theft. On information and belief, such ATM cameras record all transactions and store the information on the ATM's server. On information and belief, certain cameras capture facial features of customers. Further on information and belief, captured footage can be accessed by employees of Frost in the case of disputes or suspicious activity. *See, e.g., <https://www.anabon.com/comprehensive-guide-to-bank-security-cameras/>* (as visited May 9, 2024).
9. On information and belief, certain of the Frost ATM Machines comprise built-in cameras which serve the purposes of recording evidence in case of a mugging or other crime, monitoring people who might be up to no good, and enhancing security measures to prevent ATM fraud and theft. On information and belief, such ATM cameras retain at least 90 days of footage. *See, e.g., <https://www.anabon.com/comprehensive-guide-to-bank-security-cameras/>* (as visited May 9, 2024).
10. On information and belief, certain of the Frost ATM Machines comprise built-in cameras which serve the purposes of recording evidence in case of a mugging or other crime, monitoring people who might be up to no good, and enhancing security measures to prevent ATM fraud and theft. On information and belief, Frost checks such security cameras frequently and for various purposes, including detecting and preventing threats, investigating criminal activity, and verifying

transactions. *See, e.g.,* <https://www.anabon.com/comprehensive-guide-to-bank-security-cameras/> (as visited May 9, 2024).

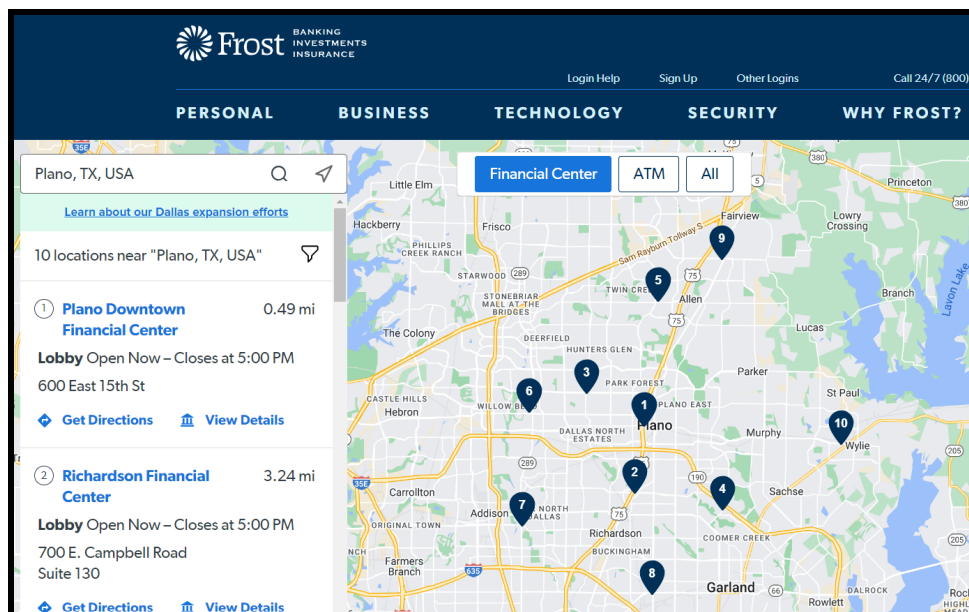
11. On information and belief, Frost protects its customers by adopting the standard industry practice of providing video surveillance for its branded ATM locations. *See, e.g.,* Bank of America Deposit Agreement at 58 (“The activity around Bank of America ATMs may be monitored or recorded by surveillance cameras”); Wells Fargo Addendum to Terms and Conditions at 7 (“The activity around Wells Fargo ATM facilities may be recorded by surveillance cameras”); Chase Deposit Account Agreement at 12 (“Some ATM locations are recorded by a surveillance camera or cameras”); *see also* SoLink Insight: How to Use Video Surveillance in a Bank in 2024 (“Financial institutions, from banks and credit unions to individual ATMs, require comprehensive security measures. Video surveillance is often part of the security regulatory requirements for banks”) (available at: <https://solink.com/resources/video-surveillance-at-a-bank/>); *see also* PCI Standards Council: ATM Security Guidelines at 17 (“Where possible and allowed by law, the ATM should be equipped with a security camera”) (available at: https://listings.pcisecuritystandards.org/pdfs/PCI_ATM_Security_Guidelines_Info_Supplement.pdf).

JURISDICTION AND VENUE

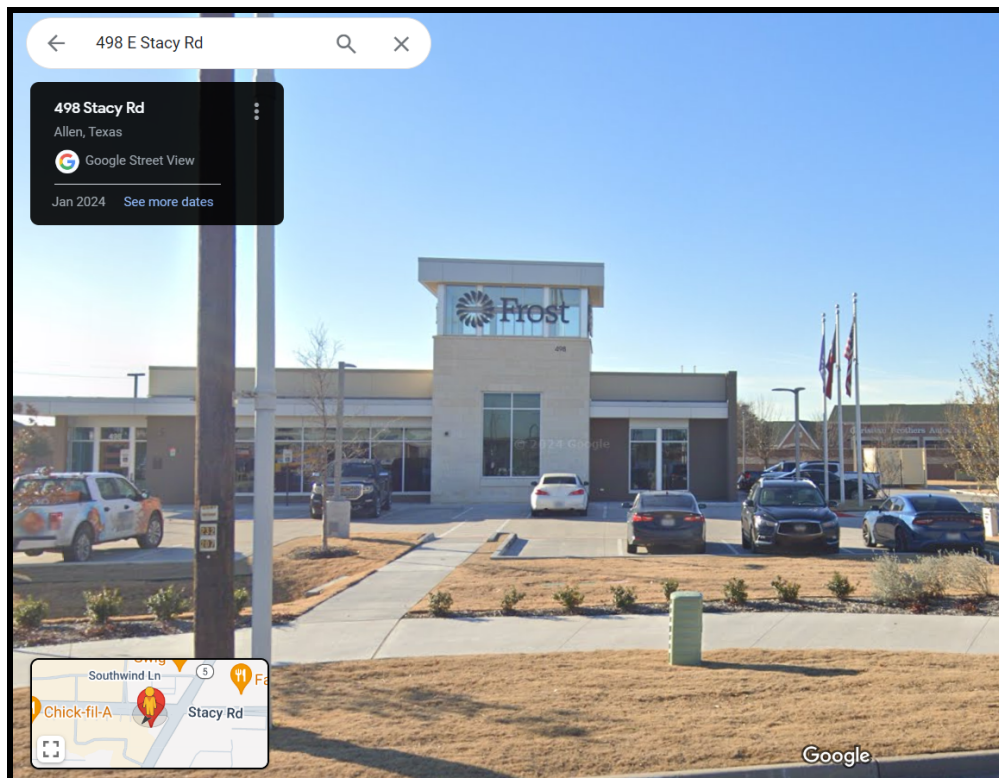
12. This Court has subject matter jurisdiction over this case under 28 U.S.C. §§ 1331 and 1338.
13. This Court has personal jurisdiction over Defendant. Defendant has continuous and systematic business contacts with the State of Texas. Defendant directly conducts business extensively throughout the State of Texas, by distributing, making, using, offering for sale, selling, and advertising (including the provision of interactive web pages; the provision and support of payment cards; the provision and support of checking accounts; the provision and support of secured and unsecured loans; and further including maintaining physical facilities and branded ATM

Machines) its services in the State of Texas and in this District. Defendant has purposefully and voluntarily made its business services, including the infringing systems and services, available to residents of this District and into the stream of commerce with the intention and expectation that they will be purchased and/or used by consumers in this District. On information and belief, Frost is a provider of: (i) payment cards and card services; (ii) checking and savings account services; and (iii) secured and unsecured loans, throughout the United States. Moreover, as an integral component of its aforementioned services, Frost provides branded ATM Machines for the beneficial use of its customers, as well as for reputational benefit, marketing purposes, and business expansion.

14. On information and belief, Defendant maintains physical brick-and-mortar business locations in the State of Texas and within this District, retains employees specifically in this District for the purpose of servicing customers in this District, offers branded ATM Machines for the beneficial use of customers located within this District, and generates substantial revenues from its business activities in this District.

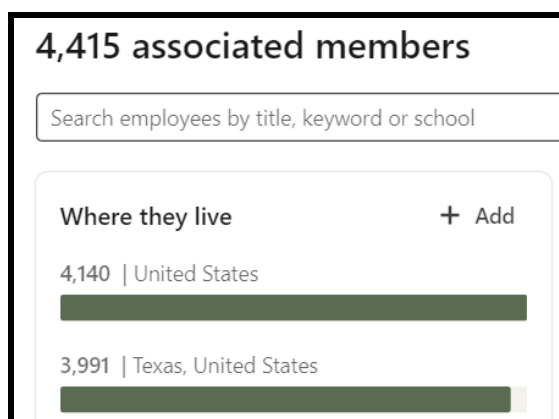


See locations.frostbank.com/search.



See Google Maps.

15. On information and belief, Frost has a substantial presence in the State of Texas and within this District, as exemplified by the LinkedIn Profile Page for Frost, which indicates there are 3991 employees of Frost residing in the State of Texas.



See Frost LinkedIn Profile Page, at <https://www.linkedin.com/company/frostbank/people/>.

16. On information and belief, Frost provides a plurality of financial services, including but not limited to providing and supporting payment cards (including but not limited to credit cards, debit cards, and/or prepaid cards) to businesses and individuals located in the State of Texas and within this District.
17. Further on information and belief, Frost provides a plurality of financial services, including but not limited to providing and supporting personal and/or business checking and savings accounts, to businesses and individuals located in the State of Texas and within this District.
18. Further on information and belief, Frost provides a plurality of financial services, including but not limited to providing and supporting secured and/or unsecured loans (including but not limited to mortgage loans, vehicle loans, personal loans, and/or business loans) to businesses and/or individuals located in the State of Texas and within this District.
19. Further on information and belief, Frost owns, controls, provides, and maintains both physical facilities and branded ATM Machines within the State of Texas and within this District.
20. Venue is proper in the Eastern District of Texas as to Defendant pursuant to at least 28 U.S.C. §§ 1391(c)(2) and 1400(b). As noted above, Defendant maintains a regular and established business presence in this District, and specifically targets customers located within this District.

PATENTS-IN-SUIT

21. Plaintiff is the sole and exclusive owner, by assignment, of the following United States Patents: (i) 9,235,841 (“the ‘841 Patent”); (ii) 9,245,270 (“the ‘270 Patent”); (iii) 9,911,124 (“the ‘124 Patent”); (iv) 10,157,385 (“the ‘385 Patent”); (v) 10,504,123 (“the ‘123 Patent”); (vi) 10,861,020 (“the ‘020 Patent”); and (vii) 11,922,429 (“the ‘429 Patent”) (hereinafter collectively as “the Amadora Patents”).

22. For purposes of this Complaint, Amadora alleges infringement of the following: (i) the '270 Patent; (ii) the '020 Patent; and (iii) the '429 Patent (hereinafter collectively as "the Asserted Patents").
23. By operation of law, the Amadora Patents were originally issued and exclusively vested to the named inventor, Raymond A. Joao, as of their respective dates of issuance. *See* 35 U.S.C. § 261; *Schwendimann v. Arkwright Advanced Coating, Inc.*, 959 F.3d 1065, 1072 (Fed. Cir. 2020); *Suppes v. Katti*, 710 Fed. Appx. 883, 887 (Fed. Cir. 2017); *Taylor v. Taylor Made Plastics, Inc.*, 565 Fed. Appx. 888, 889 (Fed. Cir. 2014). By way of written instruments, Mr. Joao has assigned all rights, title, and interest in the Amadora Patents to Amadora Systems LLC. *See* Assignment dated March 6, 2012, as filed with the United States Patent and Trademark Office on May 5, 2017 at Reel 035604 and Frame 0126; *see also* Assignment dated May 15, 2024, as filed with the United States Patent and Trademark Office on May 17, 2024 at Reel 067442 and Frame 0318. As such, Plaintiff Amadora has sole and exclusive standing to assert the Amadora Patents and to bring these causes of action for infringement and damages.
24. The Amadora Patents are each valid, enforceable, and were each duly issued in full compliance with Title 35 of the United States Code.
25. The inventions described and claimed in the Amadora Patents were invented independently and exclusively by Raymond A. Joao.
26. The Asserted Patents include numerous claims defining distinct inventions, and no single claim is representative (for purposes of infringement, eligibility, or validity) of the others. By way of example, Claim 14 of the '385 Patent recites such elements as "a card reader," whereas Claim 16 of the '270 Patent does not. Similarly, Claim 14 of the '385 Patent recites that the "clip" is "transmitted to, received by, and stored in, the server computer." Such limitation does not appear in, for example, Claim 16 of the '270 Patent. Still further, Claim 15 of the '385 Patent recites a the

“display” of the file image, whereas Claim 16 of the ’270 Patent, for example, does not. Yet still further, Claim 35 of the ’429 Patent is directed to a “banking transaction terminal,” whereas Claim 61 of the ’270 Patent is not so limited. Moreover, Claim 35 of the ’429 Patent recites a “retrieval” capability, whereas Claim 1 of the ’020 Patent does not. These important distinctions are merely representative, as even a cursory review of the claims of the Asserted Patents reveals numerous patentably distinct elements which preclude any single claim from being viewed as representative.

27. The priority date of the Asserted Patents is at least as early as July 22, 2005 (Provisional Application No. 60/701,770). As of the priority date, and for at least the reasons set forth herein, the inventions as claimed in the Asserted Patents were novel, non-obvious, unconventional, and non-routine.
28. The Asserted Patents each relate generally to unconventional systems which provide enhanced security features against theft and/or fraud for persons performing card transactions at Automatic Teller Machines (“ATMs”). *See, e.g.*, ’429 Patent at 3:1-11 and 4:66-5:8.
29. As noted, the claims of the Amadora Patents have priority to at least July 22, 2005 (the “Date of Invention”). At that time, the practice of integrating video capture capabilities to Automated Teller Machines was unconventional, as typical protocols as of that date were limited to external or area-wide surveillance systems. Such systems were not integrated into the back-end components of the financial institution, thereby restricting their effectiveness in tying video evidence with the financial details of the transaction. As a technological advancement, the inventions as claimed provide for effective account security services and reduced instances of fraud. *See, e.g.*, ’429 Patent at 3:1-11.
30. Further, as of the Date of Invention, it was unconventional for financial institutions to deliver “notification messages” containing transaction information to account holders, much less for the

secondary and additional purpose of soliciting an approval response from the account holder for the transaction. Indeed, and as expressly stated in the specification:

Current practices do not entail and/or do not include the provision for obtaining an authorization, and/or for providing notice to the cardholder before, during and/or shortly after a transaction, which cardholder authorization and/or notification procedure would be helpful and prove to be essential in preventing the fraudulent use and/or unauthorized use of a card and/or the account number corresponding thereto in a unauthorized transaction and/or shortly thereafter an unauthorized transaction has occurred, thereby minimizing the fraudulent and/or unauthorized use of the card and/or the account number corresponding thereto.

See '429 Patent at 3:45-56. As such, the inventions as claimed overcome specific shortcomings in the conventional art and provide a technological solution.

31. As further explained in the specification:

The account owner is typically notified of the above described activity involving his or her account days later when he or she either receives a mailed notice and/or when they receive and review their monthly or periodic statement, which notice may be received at a time when it may be too late for the account owner to stop or reverse the transaction and/or, in the case of a check or draft returned for insufficient funds, at a time which is too late for the account owner to attempt to collect the funds. In the case of automated teller machine accounts, these accounts may be accessed, such as with a lost, stolen, or counterfeit card and/or with a card account number(s) and/or associated personal identification number(s), by a thief or by any other unauthorized person who could then make an unauthorized withdrawal(s) therefrom.

See '429 Patent at 4:9-12. Because the conventional approach was deficient in its ability to adequately safeguard accounts from fraud, the inventions as claimed provide a specific and narrowly tailored technological solution. Indeed, this point is emphasized by the patentee:

Once again, the account owner would not receive notification and/or have knowledge of the unauthorized transaction until they are notified by the bank or financial institution either via a monthly and/or periodic statement, and/or when they attempt a transaction at the automated teller machine and, at that time, discover that funds are missing and/or have been withdrawn. In the case of savings accounts, checking accounts and/or automated teller machine accounts, there is no present apparatus or method by which to provide notification to an account owner at the time of the unauthorized transaction and/or account activity and/or shortly thereafter same.

See '429 Patent at 4:23-34.

32. The inventions as claimed further overcome the deficient conventional approach by incorporating an unconventional system architecture which generates and transmits a “notification message” to the account holder and allows for a “response message” for allowing or disallowing the transaction.

See, e.g., '429 Patent at 4:66-5:8:

The present invention provides an apparatus and a method for providing financial transaction, or other account transaction, authorization, notification, and/or security, and, in particular, provides an apparatus and a method for providing financial transaction authorization, notification, and/or security in conjunction with credit card, charge card, debit card, and/or currency or “smart” card use, savings and/or checking account activity and use, or other account use, and/or cellular telephone use, which overcomes the shortcomings of the prior art.

33. In view of at least the foregoing, which are merely representative of the disclosures of the Amadora Patents, the claims of the Amadora Patents are not drawn to laws of nature, natural phenomena, or abstract ideas. Although the systems and methods claimed in the Amadora Patents are known and implemented now (and, as a result, are widely infringed), the specific combinations of elements and steps, as recited in the claims, were not conventional or routine as of the Date of Invention.
34. Further, and in view of at least the foregoing, which is merely representative of the disclosures of the Amadora Patents, the claims of the Amadora Patents contain inventive concepts which transform the underlying non-abstract aspects of the claims into patent-eligible subject matter.
35. Consequently, the claims of the Amadora Patents recite methods resulting in improved functionality of the systems on which they are performed and represent technological improvements to the operation of computers as tools of trade. Among other advances and benefits, the Amadora Patents: (i) improve card security; (ii) integrate video capture with the back-end processing systems of the financial institution; (iii) provide for the notification of individual transactions to the account holder, along with the opportunity for the account holder to allow or

disallow the transaction; and (iv) provides an interface for the financial institution to review the video in association with a specific transaction.

36. The foregoing facts not only establish a basis to find that the claims of the Amadora Patents were unconventional and non-abstract as of the Date of Invention, they also comprise secondary indicia of non-obviousness.
37. The Amadora Patents were examined by a multitude of United States Patent Examiners, including: Thien Le, April A. Taylor, and Steven S. Paik. After giving full and proper credit to the prior art and having conducted a thorough search for all relevant art and having fully considered the most relevant art known at the time, the United States Patent Examiners each allowed all of the claims of the Asserted Patents to issue. In so doing, it is presumed that Examiners Le, Taylor, and Paik used their knowledge of the art when examining the claims. *K/S Himpp v. Hear-Wear Techs., LLC*, 751 F.3d 1362, 1369 (Fed. Cir. 2014). It is further presumed that Examiners Le, Taylor, and Paik each had experience in the field of the invention, and that the Examiners properly acted in accordance with a person of ordinary skill. *In re Sang Su Lee*, 277 F.3d 1338, 1345 (Fed. Cir. 2002). In view of the foregoing, the claims of the Asserted Patents are novel and non-obvious, including over all non-cited art which is merely cumulative with the referenced and cited prior art. Likewise, the claims of the Asserted Patents are novel and non-obvious, including over all non-cited contemporaneous state of the art systems and methods, all of which would have been known to a person of ordinary skill in the art, and which were therefore presumptively also known and considered by Examiners Le, Taylor, and Paik. Indeed, the patentee specifically and repeatedly requested that all claims be examined under the governing eligibility standards. The Examiners expressly confirmed that all claims were so examined and that all such issued claims were directed

to eligible subject matter. *See, e.g.*, Statement of Substance of Examiner Interview, as filed on August 12, 2015 in the prosecution of Application No. 11/482,430 (ultimately, the '270 Patent).

38. The Amadora Patents are pioneering patents, and have been cited as relevant prior art in hundreds of subsequent United States Patent Applications, including Applications assigned to such technology and financial services leaders as Motorola, USAA, Amazon, MasterCard, Samsung, Intuit, NCR, Boku, Visa, JPMorgan Chase, First Data, Sprint, Capital One, and Bank of America.
39. The claims of the Asserted Patents were all properly issued, and are valid and enforceable for the respective terms of their statutory life through expiration, and are enforceable for purposes of seeking damages for past infringement even post-expiration. *See, e.g., Genetics Institute, LLC v. Novartis Vaccines and Diagnostics, Inc.*, 655 F.3d 1291, 1299 (Fed. Cir. 2011) (“[A]n expired patent is not viewed as having ‘never existed.’ Much to the contrary, a patent does have value beyond its expiration date. For example, an expired patent may form the basis of an action for past damages subject to the six-year limitation under 35 U.S.C. § 286”) (internal citations omitted).
40. The nominal expiration date for the claims of the Amadora Patents is no earlier than July 2026.

THE ACCUSED INSTRUMENTALITIES

41. Upon information and belief, Frost makes, owns, operates, assembles, uses, sells, or otherwise exercises control over systems which collectively comprise Automated Teller Machines and their associated hardware and software, together with the back-end systems of Frost which monitor, process, review, and access data associated with individual transactions conducted at such Machines in the United States. Such system further comprises technologies which enable electronic notifications to Frost account holders pertaining to transactions conducted at such Frost Automated Teller Machines. Such system further comprises integrated technologies which enable video and/or audio surveillance over the Frost Automated Teller Machines, including video and/or

image capture hardware and software, which further comprises a data storage and archive system. On information and belief, such methods and systems are implemented by Frost in the form of a plurality of interconnected processing and storage systems, which are comprised of hardware (including processors and servers) and software (including source code). On information and belief, such hardware and software are collectively made, used, installed, assembled, maintained, sold, offered for sale, and tested in the United States on the authority and under the direction or control of Frost. On information and belief, such Automated Teller Machine systems are directly maintained by, and are accessible to, designated employees and/or agents of Frost. Collectively, the foregoing components operate as a single controlled apparatus to provide secure automated financial transactions with electronic transaction alerts to Frost customers for the benefit and advantage of Frost. Collectively, all of the foregoing comprises the “Accused Instrumentalities.” It is expressly stated and understood that the specific details concerning the back-end infringing systems as implemented by Frost are uniquely known to Frost and are outside reasonably accessible public view. As such, discovery is necessarily required prior to more specific identifications of the infringing systems.

COUNT I
Infringement of U.S. Patent No. 9,245,270

42. Plaintiff incorporates the above paragraphs by reference.
43. Upon information and belief, Defendant owns and/or controls the operation and/or utilization of the Accused Instrumentalities and generates substantial financial revenues therefrom, including but not limited to revenues attributable to business reputation and goodwill, including revenues derived from consumer satisfaction with the location and security features of Frost Automated Teller Machines and the availability of timely electronic transaction notifications.

44. Upon information and belief, Defendant has directly infringed and continues to directly infringe at least Claim 61 of the '270 Patent by making, using, importing, selling, and/or offering for sale the Accused Instrumentalities. The Accused Instrumentalities themselves are specially configured and assembled by Defendant to directly comprise, and do in fact directly comprise, all infringing components.
45. Upon information and belief, the Accused Instrumentalities comprise an apparatus which directly and literally comprises an apparatus having a camera for obtaining a photograph or a picture of an individual involved in a transaction on an account. More specifically, and on information and belief, the Accused Instrumentalities comprise an interconnected plurality of Frost branded Automated Teller Machines which are equipped with integral surveillance equipment, including at least video and/or still image cameras with back-end hardware and software for obtaining and storing images of individuals involved in conducting financial account transactions at such Machines, including account deposits and withdrawals. On information and belief, such apparatus is installed and used in the United States, and such apparatus exists and performs the infringing steps entirely within the United States. *See* Figure Group A.



See Exemplary Frost ATM (located in Plano, Texas).

FIGURE GROUP A

46. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus having a camera for obtaining a photograph or a picture of an individual involved in a transaction on an account.
47. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes an input device for inputting or entering, or a receiver for receiving, information regarding the transaction. More specifically, the Accused Instrumentalities comprise a data entry keypad and/or interactive touchscreen display, together with hardware and software configured to receive user input via such keypad and/or touchscreen. The data entry comprises information regarding a transaction, which variably includes such information as PIN Number

and/or transaction details (e.g., account selection, transaction type, and transaction value). See Figure Group B.




See Exemplary Frost ATM (located in Plano, Texas).

FIGURE GROUP B

48. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus having an input device for inputting or entering, or a receiver for receiving, information regarding the transaction.
49. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a processing device for processing the information regarding the transaction, wherein the processing device is adapted for generating a notification message containing information regarding the transaction. More specifically, the Accused Instrumentalities comprise a back-end account data processing system which, *inter alia*, is configured to perform,

and does perform, the promoted functionality of Frost with respect to account maintenance and the processing of data pertaining to transactions carried out at the Frost branded Automated Teller Machines for the respective account holder. On information and belief, such system further comprises configurations and programming which generate electronic account alert messages (such as text messages and/or email messages) to the account holder associated with individual transactions as carried out via the Frost branded Automated Teller Machines. Such messages contain information regarding the transaction, such as the date, time, location or merchant name, and/or dollar amount. *See* Figure Group C.

Debit Card Alerts



Protecting your accounts and information is—and will always be—a priority. Debit Card Alerts are just one of the ways we protect your Frost Personal and Business Accounts against unauthorized debit card purchases. This is all part of the work we do to regularly optimize and strengthen our overall security systems.

See <https://www.frostbank.com/online-mobile/alerts>

Customizable Alerts

No one knows your purchase patterns better than you. With a quick tap, you can choose to get customizable Debit Card Alerts for up to six different potentially fraudulent activities. Turning them on helps you more closely monitor activity in your account.

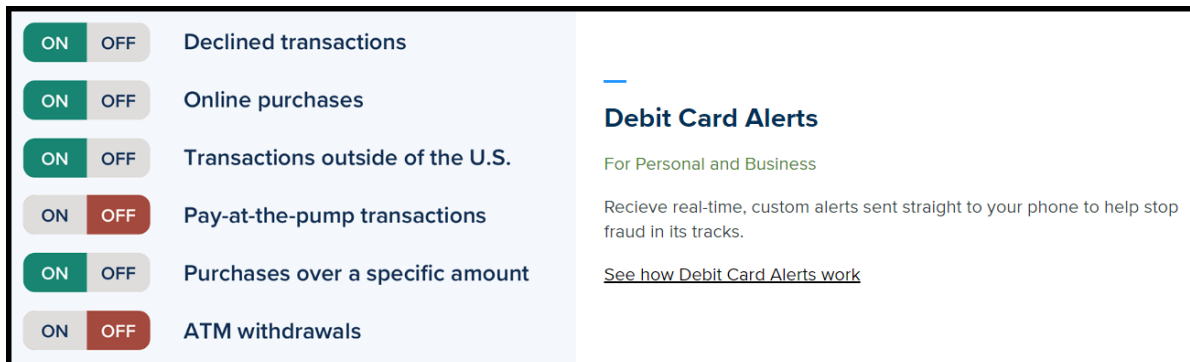
If one of your alerts is triggered, we'll send you a text to notify you of potentially suspicious behaviors. You only need to call us back if the transaction looks suspicious.

[Sign up for customizable Debit Card Alerts »](#)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	Declined transactions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Online purchases
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Transactions outside of the U.S.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pay-at-the-pump transactions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Purchases over a specific amount
<input type="checkbox"/>	<input checked="" type="checkbox"/>	ATM withdrawals

In addition to customizable Debit Card Alerts, we regularly review accounts for unusual activity. We may send you a fraud alert asking you to confirm whether you recognize a particular transaction; it's important that you respond to these fraud alerts. Business account holders and those with an international phone number will only receive an email, not a text message. You do not need to enroll to receive these standard Debit Card Alerts.

See <https://www.frostbank.com/online-mobile/alerts>



See <https://www.frostbank.com/financial-security>

FIGURE GROUP C

50. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus having a processing device for processing the information regarding the transaction, wherein the processing device is adapted for generating a notification message containing information regarding the transaction.

51. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a transmitter for transmitting the notification message to a communication device associated with an individual account holder independently of any processing of the transaction by a transaction authorization processing computer. More specifically, the Accused Instrumentalities comprise a back-end account data processing system which, *inter alia*, is configured to perform, and does perform, the promoted functionality of Frost with respect to account maintenance and the processing of data pertaining to transactions carried out at the Frost branded Automated Teller Machines for the respective account holder. On information and belief, such system further comprises configurations and programming which

generate electronic account alert messages (such as text messages and/or email messages) to the account holder associated with individual transactions as carried out via the Frost branded Automated Teller Machines. Such messages contain information regarding the transaction, such as the date, time, location or merchant name, and/or dollar amount, and are transmitted to at least one communication device associated with the respective account holder using either text messaging and/or email messaging protocols. On information and belief, such messages are transmitted to devices associated with the individual account holder in accordance with a database which comprises verified contact information (*e.g.*, mobile number and/or email address) for each Frost account holder. *See* Figure Group C. On information and belief, such notification message communications are transmitted independently of any processing of the transaction by a transaction authorization processing computer.

52. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus comprising a transmitter for transmitting the notification message to a communication device associated with an individual account holder independently of any processing of the transaction by a transaction authorization processing computer.
53. Upon information and belief, the Accused Instrumentalities further comprise an apparatus in which the transmitter or the apparatus is directly and literally adapted to transmit the photograph or the picture to the communication device independently of any processing of the transaction by the transaction authorization processing computer. More specifically, and on information and belief, and as discussed above, the Accused Instrumentalities comprise an interconnected plurality of Frost branded Automated Teller Machines which are equipped with integral surveillance equipment, including at least video and/or still image cameras with back-end hardware and software for obtaining and storing images of individuals involved in conducting financial account

transactions at such Machines, including account deposits and withdrawals. *See* Figure Group A. On information and belief, such back-end hardware and software is further configured and adapted such that it can transmit a captured digital image (from the aforementioned surveillance equipment) to the communication device of the account holder (via one or both of text message delivery (MMS) or email message attachment). On information and belief, such image transmission is carried out independently of any processing of the transaction by the transaction authorization processing computer.

54. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus in which the transmitter or the apparatus is directly and literally adapted to transmit the photograph or the picture to the communication device independently of any processing of the transaction by the transaction authorization processing computer.
55. The foregoing infringement on the part of Defendant has caused past and ongoing injury to Plaintiff. The amount of damages adequate to compensate for the infringement shall be determined at trial but is in no event less than a reasonable royalty from the date of first infringement to the expiration of the '270 Patent.
56. To the extent Defendant continues, and has continued, its infringing activities noted above in an infringing manner post-notice of the '270 Patent, such infringement is necessarily willful and deliberate.
57. Each of Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

COUNT II
Infringement of U.S. Patent No. 10,861,020

58. Plaintiff incorporates the above paragraphs by reference.
59. Upon information and belief, Defendant owns and/or controls the operation and/or utilization of the Accused Instrumentalities and generates substantial financial revenues therefrom, including

but not limited to revenues attributable to business reputation and goodwill, including revenues derived from consumer satisfaction with the location and security features of Frost Automated Teller Machines and the availability of timely electronic transaction notifications.

60. Upon information and belief, Defendant has directly infringed and continues to directly infringe at least Claim 2 of the '020 Patent by making, using, importing, selling, and/or offering for sale the Accused Instrumentalities. The Accused Instrumentalities themselves are specially configured and assembled by Defendant to directly comprise, and do in fact directly comprise, all infringing components.
61. Upon information and belief, the Accused Instrumentalities comprise an apparatus which directly and literally includes a transaction terminal having an input device or a receiver, wherein the input device inputs or the receiver receives information regarding an account and transaction information regarding a transaction on or involving the account. More specifically, the Accused Instrumentalities comprise an Automated Teller Machine for conducting financial transactions, and which further comprise a data entry keypad and/or interactive touchscreen display, together with hardware and software configured to receive user input via such keypad and/or touchscreen. The data entry comprises information regarding an account and a transaction, which variably includes such information as PIN Number and/or transaction details (*e.g.*, account selection, transaction type, and transaction value). *See* Figure Group B.
62. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus comprising a transaction terminal, which further comprises an input device or a receiver, wherein the input device inputs or the receiver receives information regarding an account and transaction information regarding a transaction on or involving the account.

63. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a transaction terminal having a camera or a video recording device, wherein the camera or the video recording device obtains or records a photograph or a video clip of an individual involved in the transaction. More specifically, and on information and belief, the Accused Instrumentalities comprise an interconnected plurality of Frost branded Automated Teller Machines which are equipped with integral surveillance equipment, including at least video and/or still image cameras with back-end hardware and software for obtaining and storing images of individuals involved in conducting financial account transactions at such Machines, including account deposits and withdrawals. On information and belief, such apparatus is installed and used in the United States, and such apparatus exists and performs the infringing steps entirely within the United States. *See* Figure Group A.
64. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a transaction terminal having a camera or a video recording device, wherein the camera or the video recording device obtains or records a photograph or a video clip of an individual involved in the transaction.
65. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a transaction terminal having a processor, wherein the processor processes the transaction information. More specifically, the Accused Instrumentalities comprise a back-end account data processing system which, *inter alia*, is configured to perform, and does perform, the processing and allocation of data pertaining to transactions carried out at the Frost branded Automated Teller Machines for the respective account holder (*e.g.*, processing the data underlying and enabling debit and/or credit transactions).

66. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a transaction terminal having a processor, wherein the processor processes the transaction information.
67. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a computer, which further comprises a database, wherein the database stores information regarding the transaction and the photograph or the video clip of the individual involved in the transaction. More specifically, the Accused Instrumentalities comprise integrated technologies which enable video and/or audio surveillance over the Frost Automated Teller Machines, including video and/or image capture hardware and software, which further comprises a data storage and archive system and database. On information and belief, such methods and systems are implemented by Frost in the form of at least one interconnected computer which includes processing and storage systems and databases for storing captured video and/or images in association with the corresponding transaction data (such as transaction date, account number, and/or transaction type) for later search and retrieval by Frost.
68. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a computer, which further comprises a database, wherein the database stores information regarding the transaction and the photograph or the video clip of the individual involved in the transaction.
69. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes hardware and software for transmitting the information regarding the transaction and the photograph or the video clip of the individual involved in the transaction to a communication device independently of any processing of the transaction by a transaction authorization processing computer. More specifically, and as discussed above, the Accused

Instrumentalities comprise integrated technologies which enable video and/or audio surveillance over the Frost Automated Teller Machines, including video and/or image capture hardware and software, which further comprises a data storage and archive system and database. On information and belief, such information regarding the transaction and the associated captured video and/or surveillance image are accessible to agents of Frost via proprietary Frost interfaces (“communication devices”) designed for, *inter alia*, fraud investigations and specific transaction inquiries. On information and belief, such image and transaction data transmission is carried out independently of any processing of the transaction by the transaction authorization processing computer.

70. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which transmits the information regarding the transaction and the photograph or the video clip of the individual involved in the transaction to a communication device independently of any processing of the transaction by a transaction authorization processing computer.
71. Upon information and belief, the Accused Instrumentalities further comprise an apparatus in which the camera of the video recording device is located on the transaction terminal. More specifically, and as discussed above, the Accused Instrumentalities comprise an interconnected plurality of Frost branded Automated Teller Machines which are equipped with integral surveillance equipment, including at least video and/or still image cameras with back-end hardware and software for obtaining and storing images of individuals involved in conducting financial account transactions at such Machines, including account deposits and withdrawals. *See* Figure Group A.

72. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus in which the camera of the video recording device is located on the transaction terminal.
73. The foregoing infringement on the part of Defendant has caused past and ongoing injury to Plaintiff. The amount of damages adequate to compensate for the infringement shall be determined at trial but is in no event less than a reasonable royalty from the date of first infringement to the expiration of the '020 Patent.
74. To the extent Defendant continues, and has continued, its infringing activities noted above in an infringing manner post-notice of the '020 Patent, such infringement is necessarily willful and deliberate.
75. Each of Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

COUNT III
Infringement of U.S. Patent No. 11,922,429

76. Plaintiff incorporates the above paragraphs by reference.
77. Upon information and belief, Defendant owns and/or controls the operation and/or utilization of the Accused Instrumentalities and generates substantial financial revenues therefrom, including but not limited to revenues attributable to business reputation and goodwill, including revenues derived from consumer satisfaction with the location and security features of Frost Automated Teller Machines and the availability of timely electronic transaction notifications.
78. Upon information and belief, Defendant has directly infringed and continues to directly infringe at least Claims 41 and 48 of the '429 Patent by making, using, importing, selling, and/or offering for sale the Accused Instrumentalities. The Accused Instrumentalities themselves are specially configured and assembled by Defendant to directly comprise, and do in fact directly comprise, all infringing components.

79. Upon information and belief, the Accused Instrumentalities comprise an apparatus which directly and literally includes a banking transaction terminal having a user input device or a receiver, wherein the user input device inputs or the receiver receives information regarding an account and transaction information regarding a transaction on or involving the account. More specifically, the Accused Instrumentalities comprise an Automated Teller Machine for conducting financial transactions, and which further comprise a data entry keypad and/or interactive touchscreen display, together with hardware and software configured to receive user input via such keypad and/or touchscreen. The data entry comprises information regarding an account and a transaction, which variably includes such information as PIN Number and/or transaction details (*e.g.*, account selection, transaction type, and transaction value). *See* Figure Group B.
80. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus comprising a banking transaction terminal having a user input device or a receiver, wherein the user input device inputs or the receiver receives information regarding an account and transaction information regarding a transaction on or involving the account.
81. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a banking transaction terminal having a camera or a video recording device, wherein the camera or the video recording device obtains or records a photograph or a video clip of an individual involved in the transaction, wherein the camera or the video recording device obtains the photograph or the video clip of the individual involved in the transaction during the transaction. More specifically, and on information and belief, the Accused Instrumentalities comprise an interconnected plurality of Frost branded Automated Teller Machines which are equipped with integral surveillance equipment, including at least video and/or still image cameras with back-end hardware and software for obtaining and storing images of individuals involved in

conducting financial account transactions at such Machines, during the process and at the time of conducting such transactions, including account deposits and withdrawals. On information and belief, such apparatus is installed and used in the United States, and such apparatus exists and performs the infringing steps entirely within the United States. *See* Figure Group A.

82. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a banking transaction terminal having a camera or a video recording device, wherein the camera or the video recording device obtains or records a photograph or a video clip of an individual involved in the transaction, wherein the camera or the video recording device obtains the photograph or the video clip of the individual involved in the transaction during the transaction.
83. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a banking transaction terminal having a processor, wherein the processor processes the transaction information. More specifically, the Accused Instrumentalities comprise a back-end account data processing system which, *inter alia*, is configured to perform, and does perform, the processing and allocation of data pertaining to transactions carried out at the Frost branded Automated Teller Machines for the respective account holder (*e.g.*, processing the data underlying and enabling debit and/or credit transactions).
84. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a banking transaction terminal having a processor, wherein the processor processes the transaction information.
85. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a central processing computer of or for a financial institution or any number of financial institutions, wherein the banking transaction terminal is linked to, or connected

to, the central processing computer. More specifically, the Accused Instrumentalities comprise integrated technologies which enable video and/or audio surveillance over the Frost Automated Teller Machines, including video and/or image capture hardware and software, which further comprises a data storage and archive system and database. On information and belief, such methods and systems are implemented by Frost in the form of at least one interconnected central processing computer which is under the direction and control of Frost, which is electronically interconnected with the Frost branded Automated Teller Machine network, and which includes processing and storage systems, components, and databases for, *inter alia*, one or more of: (i) storing captured video and/or image files in association with the corresponding Automated Teller Machine transaction data (such as transaction date, account number, and/or transaction type) for later search and retrieval by Frost and/or by agents of Frost; (ii) generating a notification message to the account holder containing information regarding the Automated Teller Machine transaction; and (iii) processing and allocation of data pertaining to transactions carried out at the Frost branded Automated Teller Machines for the respective account holder (*e.g.*, processing the data underlying and enabling debit and/or credit transactions).

86. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a central processing computer of or for a financial institution or any number of financial institutions, wherein the banking transaction terminal is linked to, or connected to, the central processing computer.
87. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a central processing computer, which further comprises a database, wherein the database stores information regarding the transaction and the photograph or the video clip of the individual involved in the transaction. More specifically, and as discussed above, the

Accused Instrumentalities comprise integrated technologies which enable video and/or audio surveillance over the Frost Automated Teller Machines, including video and/or image capture hardware and software, which further comprises a data storage and archive system and database. On information and belief, such methods and systems are implemented by Frost in the form of at least one interconnected central processing computer which is under the direction and control of Frost, which is electronically interconnected with the Frost branded Automated Teller Machine network, and which includes processing and storage systems, components, and databases for, *inter alia*, at least storing captured video and/or image files in association with the corresponding Automated Teller Machine transaction data (such as transaction date, account number, and/or transaction type) for later search and retrieval by Frost and/or by agents of Frost.

88. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a central processing computer, which further comprises a database, wherein the database stores information regarding the transaction and the photograph or the video clip of the individual involved in the transaction.
89. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a central processing computer, which further comprises a display, wherein the display displays information or data to a user or an operator. More specifically, and as discussed above, the Accused Instrumentalities comprise integrated technologies which enable video and/or audio surveillance over the Frost Automated Teller Machines, including video and/or image capture hardware and software, which further comprises a data storage and archive system and database. On information and belief, such methods and systems are implemented by Frost in the form of at least one interconnected central processing computer which is under the direction and control of Frost, which is electronically interconnected with the Frost branded Automated

Teller Machine network, and which includes processing and storage systems, components, and databases for, *inter alia*, at least storing captured video and/or image files in association with the corresponding Automated Teller Machine transaction data (such as transaction date, account number, and/or transaction type) for later search and retrieval by Frost and/or by agents of Frost. On information and belief, such information regarding the transaction and the associated captured video and/or surveillance image are accessible to agents of Frost via proprietary Frost interfaces and associated computer displays designed for, *inter alia*, fraud investigations and specific transaction inquiries.

90. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a central processing computer, which further comprises a display, wherein the display displays information or data to a user or an operator.
91. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a transmitter for transmitting a notification message to a communication device associated with an account holder of the account, wherein the notification message contains information for providing notification of the transaction. More specifically, the Accused Instrumentalities comprise a back-end account data processing system which, *inter alia*, is configured to perform, and does perform, the promoted functionality of Frost with respect to account maintenance and the processing of data pertaining to transactions carried out at the Frost branded Automated Teller Machines for the respective account holder. On information and belief, such system further comprises configurations and programming which generate electronic account alert messages (such as text messages and/or email messages) to the account holder associated with individual transactions as carried out via the Frost branded Automated Teller Machines. Such messages contain information regarding the transaction, such as the date, time, location or

merchant name, and/or dollar amount, and are transmitted to at least one communication device associated with the respective account holder using either text messaging and/or email messaging protocols. On information and belief, such messages are transmitted to devices associated with the individual account holder in accordance with a database which comprises verified contact information (*e.g.*, mobile number and/or email address) for each Frost account holder. *See* Figure Group C.

92. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a transmitter for transmitting a notification message to a communication device associated with an account holder of the account, wherein the notification message contains information for providing notification of the transaction.
93. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a central processing computer, which further provides for a retrieval, by the user or the operator via the display, of the information regarding the transaction and the photograph or the video clip of the individual involved in the transaction. More specifically, on information and belief and as discussed above, the Accused Instrumentalities comprise integrated technologies which enable video and/or audio surveillance over the Frost Automated Teller Machines, including video and/or image capture hardware and software, which further comprises a data storage and archive system and database. On information and belief, such methods and systems are implemented by Frost in the form of at least one interconnected central processing computer which is under the direction and control of Frost, which is electronically interconnected with the Frost branded Automated Teller Machine network, and which includes processing and storage systems, components, and databases for, *inter alia*, at least storing captured video and/or image files in association with the corresponding Automated Teller Machine transaction data (such

as transaction date, account number, and/or transaction type) for later search and retrieval by Frost and/or by agents of Frost. On information and belief, such information regarding the transaction and the associated captured video and/or surveillance image are accessible to agents of Frost via proprietary Frost interfaces and associated computer displays designed for, *inter alia*, fraud investigations and specific transaction inquiries.

94. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which includes a central processing computer, which further provides for a retrieval, by the user or the operator via the display, of the information regarding the transaction and the photograph or the video clip of the individual involved in the transaction.
95. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally includes a banking transaction terminal having a card reader, wherein the card reader obtains information regarding the account. More specifically, the Accused Instrumentalities comprise Frost branded Automated Teller Machines which are equipped with integral card reader components which include one or more of: (i) EMV chip readers; (ii) magnetic strip readers; and/or (iii) NFC chip readers. Such integrated components are designed to obtain, and do obtain, information regarding the account from such methods, including but not limited to the account number. *See* Figure Group D.



See Exemplary Frost ATM (located in Plano, Texas).

FIGURE GROUP D

96. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise a banking transaction terminal having a card reader, wherein the card reader obtains information regarding the account.
97. Upon information and belief, the Accused Instrumentalities further comprise an apparatus which directly and literally receives a transaction response message transmitted from the communication device, wherein the transaction response message contains information for authorizing, allowing, or disallowing, the transaction. More specifically, and as discussed above, the Accused Instrumentalities comprise configurations and programming which generate electronic account alert messages (such as text messages and/or email messages) to the account holder associated with individual transactions as carried out via the Frost branded Automated Teller Machines. Such

messages contain information regarding the transaction, such as the date, time, location or merchant name, and/or dollar amount. *See* Figure Group C. Such messages further provide a response means by which the account holder, via the communication device, can transmit a response message (which is received and acted upon by the Accused Instrumentalities) containing information for authorizing, allowing, or disallowing, the subject transaction. *See id.*

98. In view of the foregoing, and on information and belief, the Accused Instrumentalities thus comprise an apparatus which receives a transaction response message transmitted from the communication device, wherein the transaction response message contains information for authorizing, allowing, or disallowing, the transaction.
99. The foregoing infringement on the part of Defendant has caused past and ongoing injury to Plaintiff. The amount of damages adequate to compensate for the infringement shall be determined at trial but is in no event less than a reasonable royalty from the date of first infringement to the expiration of the '429 Patent.
100. To the extent Defendant continues, and has continued, its infringing activities noted above in an infringing manner post-notice of the '429 Patent, such infringement is necessarily willful and deliberate.
101. Each of Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, Amadora Systems LLC. respectfully requests the Court enter judgment against Defendant as follows:

1. Declaring that Defendant has infringed the Asserted Patent(s);
2. Awarding Amadora Systems LLC its damages suffered because of Defendant's infringement of the Asserted Patent(s);

3. Awarding Amadora Systems LLC its costs, reasonable attorneys' fees, expenses, and interest;
4. Awarding Amadora Systems LLC ongoing post-trial royalties for infringement of the non-expired Asserted Patent(s); and
5. Granting Amadora Systems LLC such further relief as the Court finds appropriate.

JURY DEMAND

Plaintiff Amadora Systems LLC respectfully demands trial by jury, under Fed. R. Civ. P. 38.

Dated: July 31, 2024

Respectfully Submitted

/s/ M. Scott Fuller

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