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Attorney(s) for Plaintiff Coding Technologies, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

Coding Technologies, LLC,

Plaintiff,

v.

Zuca, Inc.,

Defendant.

CASE NO. 5:20-cv-02830

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

Plaintiff Coding Technologies, LLC (“Plaintiff” or “CT”) files this Complaint against Zuca, Inc. (“Defendant” or “Zuca”) for infringement of United States Patent No. 8,540,159 (“the ‘159 Patent”) and alleges as follows:

PARTIES AND JURISDICTION

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

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

4 3. Plaintiff is a Texas limited liability company with a place of business at
5 1801 NE 123 Street, Suite 314, Miami, FL 33181.

6 4. On information and belief, Defendant is a California corporation with a
7 principal office address of 320 South Milpitas Blvd., Milpitas, CA 95035. On
8 information and belief, Defendant may be served through its agent, Dale Freeman, at
9 1600 Shattuck Avenue, Suite 216C, Berkeley, CA 94709.

10 5. This Court has personal jurisdiction over Defendant because Defendant
11 has committed, and continues to commit, acts of infringement in this District, has
12 conducted business in this District, and/or has engaged in continuous and systematic
13 activities in this District.

14 6. Upon information and belief, Defendant's instrumentalities that are
15 alleged herein to infringe were and continue to be used, imported, offered for sale,
16 and/or sold in this District.

17 **VENUE**

18 7. On information and belief, venue is proper in this District under 28
19 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District.
20 Alternatively, acts of infringement are occurring in this District and Defendant has a
21 regular and established place of business in this District.

22 **COUNT I**

23 **(INFRINGEMENT OF UNITED STATES PATENT NO. 8,540,159)**

24 8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

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

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1 10. Plaintiff is the owner by assignment of the ‘159 Patent with sole rights
2 to enforce the ‘159 Patent and sue infringers.

3 11. A copy of the ‘159 Patent, titled “Method for Providing Mobile Service
4 Using Code-pattern,” is attached hereto as Exhibit A.

5 12. The ‘159 Patent is valid, enforceable, and was duly issued in full
6 compliance with Title 35 of the United States Code.

7 13. Upon information and belief, at least through internal testing, Defendant
8 has infringed and continues to infringe one or more claims, including at least Claim
9 1 of the ‘159 Patent by using and/or incorporating code patterns in connection with
10 promotional media distributed by and/or controlled by Defendant in a manner covered
11 by one or more claims of the ‘159 Patent. Defendant has infringed and continues to
12 infringe the ‘159 Patent in violation of 35 U.S.C. § 271.

13 14. Regarding Claim 1, at least through internal use and testing, Defendant
14 provides content (e.g., a website with promotional information) with the use of a code
15 pattern (e.g., a QR code) in connection with promotional media containing the code
16 pattern. The content is provided by a user terminal (e.g., a smartphone or other device
17 capable of scanning the code pattern). Certain aspects of this element are illustrated
18 in the screenshots below.

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Source: <https://www.zuca.com/found>

15. A photographic image of the code pattern (e.g., image of QR code) is obtained using a camera of the user terminal (e.g., the camera of the smartphone). These elements are illustrated in the screenshots below and/or in screenshots provided in connection with other allegations herein.



Source: Screenshot taken from Smartphone

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