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5	Attorney(s) for Plaintiff Coding Technologies, LLC	
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8	IN THE UNITED STATES DISTRICT COURT  FOR THE NORTHERN DISTRICT OF CALIFORNIA	
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10	FOR THE NORTHERN DI	STRICT OF CALIFORNIA
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12		
13	Coding Technologies, LLC,	CASE NO. 5:20-cv-02830
14	Plaintiff,	
15		COMPLAINT FOR PATENT INFRINGEMENT
16	V.	INTRINGENENT
17	Zuca, Inc.,	JURY TRIAL DEMANDED
18	Defendant.	
19		
20		
21		(((D) ' ('CO) ((CT))) C1 (1' C 1')
22	Plaintiff Coding Technologies, LLC ("Plaintiff" or "CT") files this Complaint	
23	against Zuca, Inc. ("Defendant" or "Zuca") for infringement of United States Patent	
24	No. 8,540,159 ("the '159 Patent") and alleges as follows:	
25	PARTIES AND JURISDICTION	
26	1. This is an action for patent infringement under Title 35 of the United	
27	States Code. Plaintiff is seeking injunctive relief as well as damages.	



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- 2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.
- 3. Plaintiff is a Texas limited liability company with a place of business at 1801 NE 123 Street, Suite 314, Miami, FL 33181.
- 4. On information and belief, Defendant is a California corporation with a principal office address of 320 South Milpitas Blvd., Milpitas, CA 95035. On information and belief, Defendant may be served through its agent, Dale Freeman, at 1600 Shattuck Avenue, Suite 216C, Berkeley, CA 94709.
- 5. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.
- Upon information and belief, Defendant's instrumentalities that are 6. alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

### **VENUE**

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

## COUNT I

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

- Plaintiff incorporates paragraphs 1 through 7 herein by reference. 8.
- This cause of action arises under the patent laws of the United States 9. and, in particular, under 35 U.S.C. §§ 271, et seq.

- 10. Plaintiff is the owner by assignment of the '159 Patent with sole rights to enforce the '159 Patent and sue infringers.
- 11. A copy of the '159 Patent, titled "Method for Providing Mobile Service Using Code-pattern," is attached hereto as Exhibit A.
- 12. The '159 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.
- 13. Upon information and belief, at least through internal testing, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1 of the '159 Patent by using and/or incorporating code patterns in connection with promotional media distributed by and/or controlled by Defendant in a manner covered by one or more claims of the '159 Patent. Defendant has infringed and continues to infringe the '159 Patent in violation of 35 U.S.C. § 271.
- 14. Regarding Claim 1, at least through internal use and testing, Defendant provides content (e.g., a website with promotional information) with the use of a code pattern (e.g., a QR code) in connection with promotional media containing the code pattern. The content is provided by a user terminal (e.g., a smartphone or other device capable of scanning the code pattern). Certain aspects of this element are illustrated in the screenshots below.





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.



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Source: Screenshot taken from Smartphone



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