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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           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.



24  
25 Source: Screenshot taken from Smartphone

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