**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SCANNING TECHNOLOGIES INNOVATIONS LLC,	§ § §	
Plaintiff,	§ §	Case No: 6:21-cv-12
vs.	§ §	PATENT CASE
IDEABUD, LLC d/b/a TICKETBUD	§ § §	
Defendant.	§ § §	

ORIGINAL COMPLAINT

Pursuant to F.R.C.P. 15(a)(1)(B), Plaintiff Scanning Technologies Innovations, LLC ("Plaintiff" or "STI") files this Original Complaint against Ideabud, LLC d/b/a Ticketbud ("Defendant" or "Ideabud") for infringement of United States Patent No. 10,600,101 (hereinafter "the '101 Patent").

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.

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 having an address of 1801 NE 123 St., Suite 314, Miami, FL 33181.

4.   On information and belief, Defendant is a Texas limited liability company corporation having a place of business at 3300 N. Interstate Hwy. 35, Austin, TX 78705.

5.   On information and belief, 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.

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

VENUE

7.   Venue is proper in this District 28 U.S.C. §1400(b) because Defendant is deemed to reside in 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. 10,600,101)

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

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

10.   Plaintiff is the owner by assignment of the '101 Patent with sole rights to enforce the '101 Patent and sue infringers.

11.   A copy of the '101 Patent, titled "Systems and Methods for Indicating the Existence of Accessible Information Pertaining to Articles of Commerce," is attached hereto as Exhibit A.

12.   The '101 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13.   The '101 Patent describes systems and methods for downloading a look-up table from a server database to a mobile device via a communication network. '101 Patent, Abstract.

The look-up table is configured to store a plurality of code numbers associated with articles of commerce and a plurality of information link indicators. *Id.* Each indicator is associated with a respective code and article of commerce, and indicates the existence of a link to information about the article of commerce. *Id.*

14.   The '101 Patent recognizes problems associated with prior systems including that the mobile devices of prior systems take time to connect to the Internet in order to access product information. '101 Patent, 1:59-67. Also, prior systems don't readily indicate whether there is a link to additional information about the product. *Id.*

15.   Thus, the '101 Patent recognized a need to allow a consumer to readily determine whether product information is available for a product having an associated product code. '101 Patent, 2: 3:11. A further need existed for a mobile device to allow a consumer offline access to immediately determine whether the product information was available. *Id.*

16.   In certain embodiments, the '101 Patent includes a mobile device that is configured to download a look-up table from a server and store the look-up table in a local database. '101 Patent, 2:35-48. In response to receiving scan information regarding a product code, a processing device on the mobile device is configured to look up the code in the look-up table to determine whether or not a link to information about the associated product is available. *Id.*

17.   The '101 Patent solves problems with the art that are rooted in computer technology and that are associated with inventory management and the retrieval of information associated with articles of commerce. The '101 Patent claims do not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.
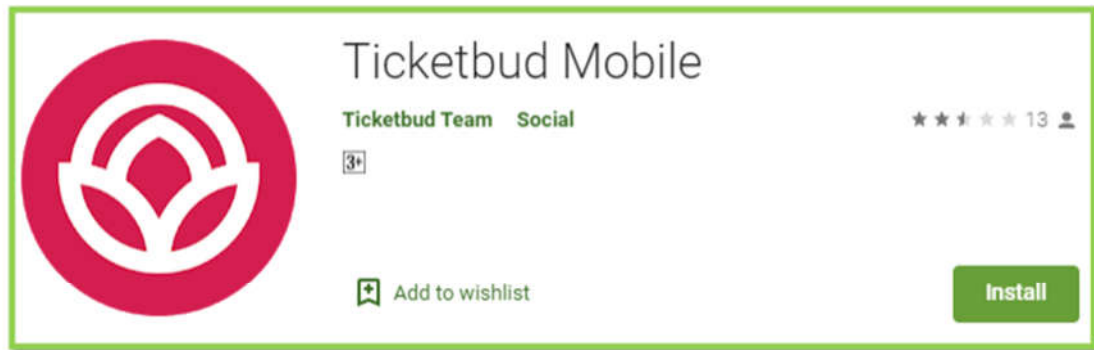
18.   The improvements of the '101 Patent and the features recited in the claims in the '101 Patent provide improvements to conventional hardware and software systems and methods. The improvements render the claimed invention of the '101 Patent non-generic in view of conventional components.

19.   The improvements of the '101 Patent and the features recitations in the claims of the '101 Patent are not those that would be well-understood, routine or conventional to one of ordinary skill in the art at the time of the invention.

20.   Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '101 Patent by making, using, importing, selling, and/or offering for sale an event ticket management system covered by one or more claims of the '101 Patent. Defendant has infringed and continues to infringe the '101 Patent directly in violation of 35 U.S.C. § 271.

21.   Defendant sells, offers to sell, and/or uses an inventory system including, without limitation, the Ticketbud ticket management system, the Ticketbud Mobile app, any associated hardware and software, and any similar products (collectively, "Product"), which infringe at least Claim 1 of the '101 Patent.
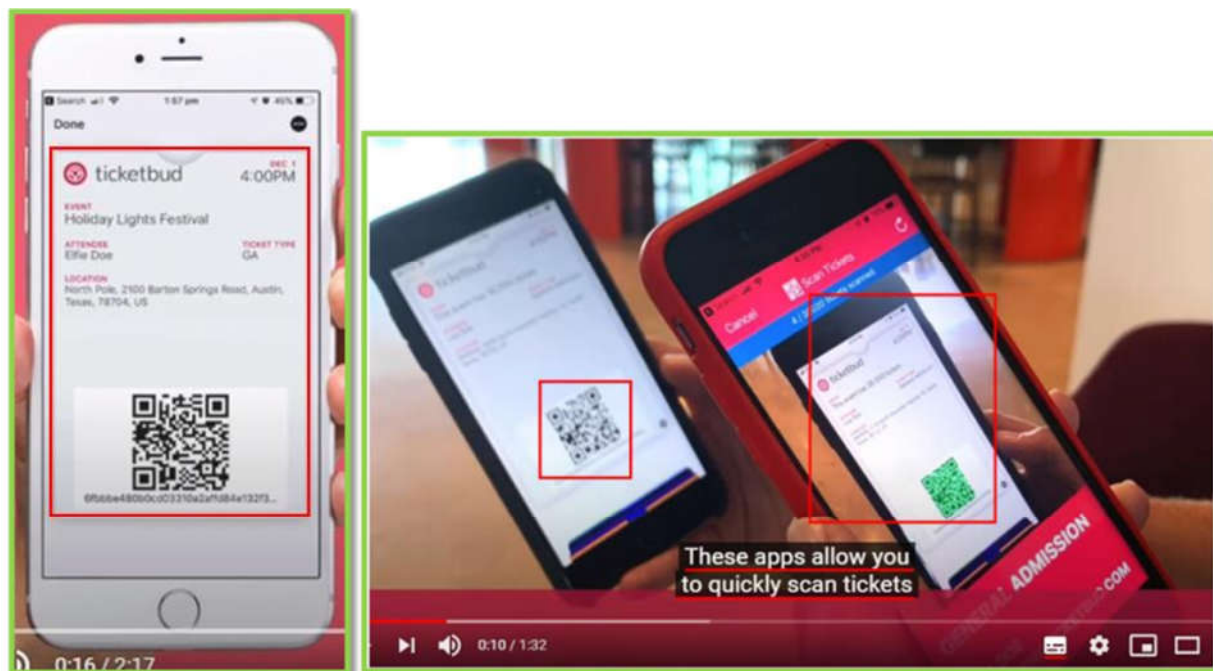
22.   The Product provides an application for scanning barcodes to obtain a decoded link, which contains information about an article of commerce. Among other things, the Product provides an event ticket management solution in which a ticket can be scanned (e.g., by way of a QR code present on the ticket) to obtain a decoded link, which contains information about an article of commerce (e.g., to display information related to a ticket when the code is scanned). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Source: https://play.google.com/store/apps/details?id=com.ticketbud.scanner

The Ticketbud Organizer helps you manage your events and sell tickets right from iOS. Browse all of the events in your account, check in attendees, and view sales information. Ticketbud uses the camera on your device to validate the Ticketbud tickets you have sold or given away and also to check-in your guests in real time.

Source: https://apps.apple.com/us/app/ticketbud/id424340955

Source: https://www.youtube.com/watch?v=5Pohk0jGPdY

23.   The Product includes a mobile device comprising a portable handheld housing

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase®
Smarter legal research.