

1 STEPHEN M. LOBBIN
2 sml@smlavvocati.com
3 SML AVVOCATI P.C.
4 888 Prospect Street, Suite 200
5 San Diego, California 92037
6 (949) 636-1391 (Phone)

7 *Attorney(s) for Display Technologies, LLC*

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

10 **DISPLAY TECHNOLOGIES, LLC,**

11 *Plaintiff,*

12 v.

13 **MOCACARE CORP.,**

14 *Defendant.*

CASE NO. 3:22-cv-00219

PATENT CASE

JURY TRIAL DEMANDED

COMPLAINT

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17 Plaintiff Display Technologies, LLC (“Plaintiff” or “Display”) files this
18 Complaint against Mocacare Corp. (“Defendant” or “Mocacare”) for infringement of
19 United States Patent No. 9,300,723 (the “ ‘723 Patent”).

20 **PARTIES AND JURISDICTION**

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

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

26 3. Plaintiff is a Texas limited liability company with an address of 1 East
27 Broward Boulevard, Suite 700, Ft. Lauderdale, FL 33301.
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1 4. On information and belief, Defendant is a Delaware corporation with a
2 principal place of business at 1755 E Bayshore Road, Suite 10A & 10B, Redwood
3 City, CA 94063. On information and belief, Defendant may be served through its
4 agent, Alice Chiu, 887 Federation Way, Palo Alto, CA 94303, or Harvard Business
5 Services, Inc., 16192 Coastal Hwy, Lewes, DE 19958.

6 5. This Court has personal jurisdiction over Defendant because Defendant
7 has committed, and continues to commit, acts of infringement in this District, has
8 conducted business in this District, and/or has engaged in continuous and systematic
9 activities in this District.

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

13 **VENUE**

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

18 **COUNT I**

19 **(INFRINGEMENT OF UNITED STATES PATENT NO. 9,300,723)**

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

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

23 10. Plaintiff is the owner by assignment of the '723 Patent with sole rights
24 to enforce the '723 Patent and sue infringers.

25 11. A copy of the '723 Patent, titled "Enabling social interactive wireless
26 communications," is attached hereto as Exhibit A.

27 12. The '723 Patent is valid, enforceable, and was duly issued in full
28 compliance with Title 35 of the United States Code.

1 13. Defendant has infringed and continues to infringe one or more claims,
 2 including at least Claim 1 of the '723 Patent by making, using, and/or selling media
 3 systems covered by one or more claims of the '723 Patent. For example, Defendant
 4 makes, uses, and/or sells the MOCACARE health app, MOCACARE BP monitor,
 5 associated software, hardware and/or apps, and any similar products ("Product"). At
 6 a minimum by internal testing, Defendant has infringed and continues to infringe the
 7 '723 Patent in violation of 35 U.S.C. § 271.

8 14. Regarding Claim 1, the Product is a media system. The Product includes
 9 a media system (e.g., health app) configured to allow a user to view a media file (e.g.,
 10 health data) from a medical device by a media terminal (e.g., smartphone) from a
 11 media node (e.g., medical device) over a communication network (e.g., Bluetooth
 12 network) through a communication link. Certain aspects of this element are illustrated
 13 in the screenshots below and/or those provided in connection with other allegations
 14 herein.



22 Source: <https://www.amazon.com/MOCACuff-Automatic-Pressure-Monitor-Bluetooth/dp/B01MTVKUOW>

23 MOCACuff features a built-in "Bluetooth Data Transmission" function,
 24 which enables the device automatically transmit measuring results to
 25 paired Bluetooth-enabled device after measurement. When connection
 26 established, BPM would transmit memory data such as Measure Date,
 27 Systolic, Diastolic and Pulse to the Bluetooth enabled device.

28 Source: <https://images-na.ssl-images-amazon.com/images/I/91oJLSPy%2BWS.pdf>

1 15. The Product includes at least one media terminal disposed in an accessible
 2 relation to at least one interactive computer network. For example, the Bluetooth
 3 network is used for sending health data from a media node (medical device) by
 4 detecting a smartphone (at least one media terminal) when the Product's app is
 5 installed on the smartphone and connected with the Product's media node through a
 6 Bluetooth network (i.e., the smartphone is in an accessible relationship with the
 7 interactive computer network). Certain aspects of this element are illustrated in the
 8 screenshots below and/or in those provided in connection with other allegations
 9 herein.



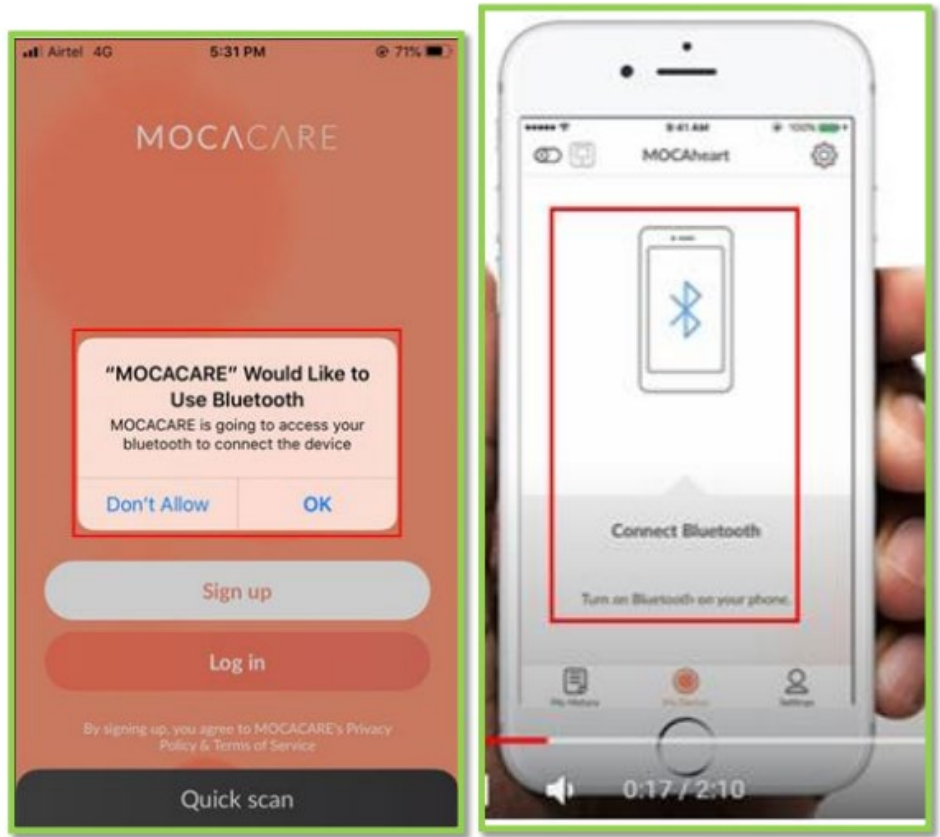
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18 Source: <https://www.amazon.com/MOCACuff-Automatic-Pressure-Monitor-Bluetooth/dp/B01MTVKUOW>

19 It syncs wirelessly with the MOCACARE App, on which you can access your measurement history,
 20 health trend graphs, and personalized health coaching. Easily export and email measurements to
 21 your doctor or loved ones to keep them informed on your health. MOCAArm is so intuitively
 designed and portable that it'll make monitoring your blood pressure more convenient than ever.

22 Source: <https://store.mocacare.com/pages/mocaarm>

23
24 16. A wireless range is structured to permit authorized access to the at least
 25 one interactive computer network. For example, the Bluetooth signals of the Product's
 26 medical device (media node) have a range within which the smartphone (media
 27 terminal) may connect.
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Source: Actual usage of a product.
Source: https://www.youtube.com/watch?v=4xBKE_VO3kg

- Make sure MOCACuff and paired Bluetooth-enabled device are within acceptable distance (no more than 10 meters) with each other. If not, put them closer.

Bluetooth Transmission

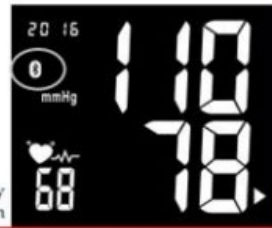
To activate Bluetooth function, please make sure your Bluetooth-enabled device have downloaded APP, and follow pairing instruction.

There are 2 ways to process Bluetooth Transmission if Bluetooth function is ON:

Measurement Completed

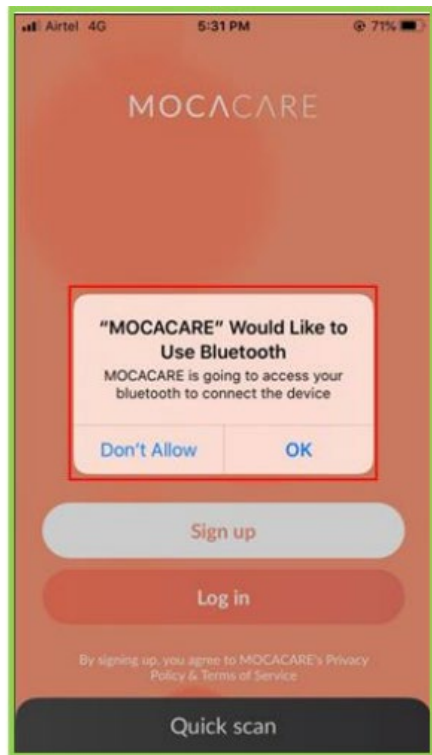
1. After measurement completed, the device activates Bluetooth function automatically, and the Bluetooth Symbol will begin flashing on the screen.
2. While transmitting the reading to your Bluetooth-enabled Device, MOCACuff Bluetooth Symbol will remain steady on the screen.
3. MOCACuff can only pair up with one Bluetooth-enabled device at a time. To transmit measuring results to other Bluetooth-enabled device, please retry Steps 1 ~ 2.

Bluetooth Symbol lit constantly under transmission



Source: <https://images-na.ssl-images-amazon.com/images/I/91oJLSPy%2BWS.pdf>

17. At least one media node is disposable within the wireless range, wherein the at least one media node is detectable by the at least one media terminal. For example, the Product's medical device (media node) is detectable by the media terminal (smartphone). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: Actual usage of a product.

Source: <https://www.youtube.com/watch?v=-Ph3L5cwMHI>

Press + button for one time:

Under Standby Mode,

1. Press + button for one time to wake up the device and starting Bluetoothfunction (Bluetooth Symbol flashing).
2. While transmitting the reading to your Bluetooth-enabled Device, MOCACuff Bluetooth Symbol will remain steady on the screen.
3. MOCACuff can only pair up with one Bluetooth-enabled device at a time. To transmit measuring results to other Bluetooth-enabled device, please retry as mention above.

- Make sure MOCACuff and paired Bluetooth-enabled device are within acceptable distance (no more than 10 meters) with each other. If not, put them closer.

Source: <https://images-na.ssl-images-amazon.com/images/I/91oJLSPy%2BWS.pdf>

1 18. At least one digital media file is initially disposed on at least one of the
 2 at least one media terminal or the at least one media node and the at least one media
 3 terminal is structured to detect the at least one media node disposed within the
 4 wireless range. For example, the health data is initially disposed on the media node
 5 (medical device/monitor) and the media terminal can detect the medical device when
 6 it is within the appropriate range. Certain aspects of this element are illustrated in the
 7 screenshots below and/or those provided in connection with other allegations herein.



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 16 Source: <https://www.amazon.com/MOCACuff-Automatic-Pressure-Monitor-Bluetooth/dp/B01MTVKUOW>

17 MOCACuff features a built-in "Bluetooth Data Transmission" function,
 18 which enables the device automatically transmit measuring results to
 19 paired Bluetooth-enabled device after measurement. When connection
 20 established, BPM would transmit memory data such as Measure Date,
 21 Systolic, Diastolic and Pulse to the Bluetooth enabled device.

22 Source: <https://images-na.ssl-images-amazon.com/images/I/91oJLSPy%2BWS.pdf>

23 19. A communication link is structured to dispose the at least one media
 24 terminal and the at least one media node in a communicative relation with one another
 25 via the at least one interactive computer network. For example, the smartphone and
 26 medical device are in a communicative relation over the Bluetooth network.
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1 **Press + button for one time:**

2 Under Standby Mode,

- 3 1. Press + button for one time to wake up the device
4 and starting Bluetoothfunction (Bluetooth Symbol
5 flashing).
6 2. While transmitting the reading to your Bluetooth-
7 enabled Device, MOCACuff Bluetooth Symbol will
8 remain steady on the screen.
9 3. MOCACuff can only pair up with one Bluetooth-enabled device at
10 a time. To transmit measuring results to other Bluetooth-enabled
11 device, please retry as mention above.

- 12 • Make sure MOCACuff and paired Bluetooth-enabled device are
13 within acceptable distance (no more than 10 meters) with each
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Bluetooth Transmission


To activate Bluetooth function, please make sure your Bluetooth-enabled device have downloaded APP, and follow pairing instruction.

There are 2 ways to process Bluetooth Transmission if Bluetooth function is ON:

Measurement Completed

1. After measurement completed, the device activates Bluetooth function automatically, and the Bluetooth Symbol will begin flashing on the screen.
2. While transmitting the reading to your Bluetooth-enabled Device, MOCACuff Bluetooth Symbol will remain steady on the screen.
3. MOCACuff can only pair up with one Bluetooth-enabled device at a time. To transmit measuring results to other Bluetooth-enabled device, please retry Steps 1 ~ 2.

Bluetooth Symbol lit constantly under transmission



Source: <https://images-na.ssl-images-amazon.com/images/I/91oJLSPy%2BWS.pdf>

20. The communication link is initiated by the at least one media terminal. For example, when the user turns on Bluetooth on the smartphone (media terminal), the smartphone initiates the communication link.



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MOCACuff features a built-in "Bluetooth Data Transmission" function, which enables the device automatically transmit measuring results to paired Bluetooth-enabled device after measurement. When connection established, BPM would transmit memory data such as Measure Date, Systolic, Diastolic and Pulse to the Bluetooth enabled device.

Source: <https://images-na.ssl-images-amazon.com/images/I/91oJLSPy%2BWS.pdf>

21. The at least one media node and the at least one media terminal are structured to transmit the at least one digital media file therebetween via the communication link. For example, the smartphone/app and the medical device are structured to transmit health data from the device to the smartphone over the wireless network.



Source: <https://www.amazon.com/MOCACuff-Automatic-Pressure-Monitor-Bluetooth/dp/B01MTVKUOW>

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22. The communication link is structured to bypass at least one media terminal security measure for a limited permissible use of the communication link by the media node to only transferring the at least one digital media file to, and displaying the at least one digital media file on, the at least one media terminal. For example, the communication link is structured so that whenever the user installs the Product's app on the smartphone (media terminal), the smartphone automatically connects (bypassing any security measures) with the Product's medical device through Bluetooth code (i.e., media terminal security) whenever the smartphone comes to the range of the Bluetooth signals (for the limited purpose of transferring data form the device to the smartphone).



Source: <https://www.amazon.com/MOCACuff-Automatic-Pressure-Monitor-Bluetooth/dp/B01MTVKUOW>

It syncs wirelessly with the MOCACARE App, on which you can access your measurement history, health trend graphs, and personalized health coaching. Easily export and email measurements to your doctor or loved ones to keep them informed on your health. MOCAArm is so intuitively designed and portable that it'll make monitoring your blood pressure more convenient than ever.

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- Make sure MOCACuff and paired Bluetooth-enabled device are within acceptable distance (no more than 10 meters) with each other. If not, put them closer.

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Bluetooth Symbol lit constantly under transmission



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23. Defendant’s actions complained of herein will continue unless Defendant is enjoined by this court.

24. Defendant’s actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

25. Plaintiff is in compliance with 35 U.S.C. § 287.

JURY DEMAND

26. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,300,723 (or, in the alternative, awarding Plaintiff running royalties from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant’s infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: January 12, 2022

Respectfully submitted,

/s/ Stephen M. Lobbin
Attorney(s) for Plaintiff