

1 Susan S.Q. Kalra (CA State Bar No. 16740)  
RAMEY LLP  
2 5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
3 Telephone: (800) 993-7499  
Fax: (832) 900-4941  
4

Southern California Office:  
5 811 Wilshire Blvd., 17th Floor  
Los Angeles, CA 90017  
6 Telephone: (800) 993-7499  
Fax: (832) 900-4941  
7

*Attorneys for Plaintiff*  
8 STREET SPIRIT IP LLC  
9

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12

13 STREET SPIRIT IP LLC,  
14 Plaintiff,  
15 v.  
16 EHARMONY, INC.,  
17 Defendant.  
18

Case No.: 23-cv-02252

**PLAINTIFF’S ORIGINAL  
COMPLAINT FOR PATENT  
INFRINGEMENT**

**(35 U.S.C. § 271)**

**JURY TRIAL DEMANDED**

19  
20 **PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**  
21

22 Street Spirit IP LLC (“Street Spirit”) files this Original Complaint and demand for  
23 jury trial seeking relief from patent infringement of the claims of U.S. Patent No.  
24 8,850,535 (“the ’535 patent”) (referred to as the “Patent-in-Suit”) by eHarmony, Inc.  
25 (“Defendant” or “eHarmony”).  
26  
27  
28

1           **I.       THE PARTIES**

2           1. Street Spirit IP LLC is a Texas Limited Liability Company with its principal  
3 place of business located in Travis County, Texas.

4           2. On information and belief, eHarmony, Inc. is a corporation organized under the  
5 laws of the State of Delaware with an office at 10900 Wilshire Blvd Fl 17, Los  
6 Angeles, CA 90024.  
7

8           3. On information and belief, Defendant sells and offers to sell products and  
9 services throughout California, including in this judicial district, and introduces  
10 products and services that perform infringing methods or processes into the stream of  
11 commerce knowing that they would be sold in California and this judicial district.  
12 Defendant can be served with process through their registered agent, CT Corporation  
13 System, 330 N. Brand Blvd, Ste 700, Glendale, CA 91203, or wherever they may be  
14 found.  
15

16           **II.       JURISDICTION AND VENUE**

17           4. This Court has original subject-matter jurisdiction over the entire action  
18 pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an  
19 Act of Congress relating to patents, namely, 35 U.S.C. § 271.  
20

21           5. This Court has personal jurisdiction over Defendant because: (i) Defendant is  
22 present within or has minimum contacts within the State of California and this judicial  
23 district; (ii) Defendant has purposefully availed itself of the privileges of conducting  
24 business in the State of California and in this judicial district; and (iii) Plaintiff's cause  
25  
26  
27  
28

1 of action arises directly from Defendant’s business contacts and other activities in the  
2 State of California and in this judicial district.

3  
4 6. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b).  
5 Defendant has committed acts of infringement and has a regular and established place  
6 of business in this District. Further, venue is proper because Defendant conducts  
7 substantial business in this forum, directly or through intermediaries, including: (i) at  
8 least a portion of the infringements alleged herein; and (ii) regularly doing or  
9 soliciting business, engaging in other persistent courses of conduct and/or deriving  
10 substantial revenue from goods and services provided to individuals in California and  
11 this District.  
12  
13

14 **III. INFRINGEMENT**

15 **A. Infringement of the ’535 Patent**

16  
17 7. On September 30, 2014, U.S. Patent No. 8,850,535 (“the ’535 patent”, attached  
18 as Exhibit A) entitled “Methods and systems for identity verification in a social  
19 network using ratings,” was duly and legally issued by the U.S. Patent and Trademark  
20 Office. Street Spirit IP LLC owns the ’535 patent by assignment.  
21

22  
23 8. The ’535 patent relates to a novel and improved identity verification and  
24 management for a social network system.

25  
26 9. Defendant maintains, operates, and administers systems, products, and services  
27 for enabling a method of providing customer relationship management for a network  
28 that infringes one or more claims of the ’535 patent, including one or more of claims

1 1-44, literally or under the doctrine of equivalents. Defendant put the inventions  
2 claimed by the '535 Patent into service (i.e., used them); but for Defendant's actions,  
3 the claimed-inventions embodiments involving Defendant's products and services  
4 would never have been put into service. Defendant's acts complained of herein  
5 caused those claimed-invention embodiments as a whole to perform, and Defendant's  
6 procurement of monetary and commercial benefit from it.  
7

9 10. Support for the allegations of infringement may be found in the chart attached  
10 as Exhibit B. These allegations of infringement are preliminary and are therefore  
11 subject to change.  
12

13 11. Defendant has and continues to induce infringement. Defendant has actively  
14 encouraged or instructed others (e.g., its customers and/or the customers of its related  
15 companies), and continues to do so, on how to use its products and services (e.g., a  
16 method of providing customer relationship management for a network) and related  
17 services that provide question and answer services across the Internet such as to cause  
18 infringement of one or more of claims 1-44 of the '535 patent, literally or under the  
19 doctrine of equivalents. Moreover, Defendant has known of the '535 patent and the  
20 technology underlying it from at least the issuance of the patent.  
21  
22  
23

24 12. Defendant has and continues to contributorily infringe. Defendant has actively  
25 encouraged or instructed others (e.g., its customers and/or the customers of its related  
26 companies), and continues to do so, on how to use its products and services (e.g., a  
27 method of providing customer relationship management for a network) and related  
28

1 services that provide question and answer services across the Internet such as to cause  
2 infringement of one or more of claims 1-44 of the '535 patent, literally or under the  
3 doctrine of equivalents. Moreover, Defendant has known of the '535 patent and the  
4 technology underlying it from at least the issuance of the patent.  
5

6 13. Defendant has caused and will continue to cause Plaintiff damage by direct  
7 and indirect infringement of (including inducing infringement of) the claims of the  
8 '535 patent.  
9

#### 10 **IV. PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiff prays for relief as follows:  
12

- 13 a. enter judgment that Defendant has infringed the claims of the '535 patent;
- 14 b. award Plaintiff damages in an amount sufficient to compensate it for  
15 Defendant's infringement of the Patents-in-Suit in an amount no less than a  
16 reasonable royalty or lost profits, together with pre-judgment and post-  
17 judgment interest and costs under 35 U.S.C. § 284;  
18
- 19 c. award Plaintiff an accounting for acts of infringement not presented at trial and  
20 an award by the Court of additional damage for any such acts of infringement;  
21
- 22 d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award Plaintiff  
23 its attorneys' fees, expenses, and costs incurred in this action;  
24
- 25 e. declare Defendant's infringement to be willful and treble the damages,  
26 including attorneys' fees, expenses, and costs incurred in this action and an  
27 increase in the damage award pursuant to 35 U.S.C. § 284;  
28

- 1 f. a decree addressing future infringement that either (if) awards a permanent  
2 injunction enjoining Defendant and its agents, servants, employees, affiliates,  
3 divisions, and subsidiaries, and those in association with Defendant from  
4 infringing the claims of the Patents-in-Suit, or (ii) awards damages for future  
5 infringement in lieu of an injunction in an amount consistent with the fact that  
6 infringement in lieu of an injunction in an amount consistent with the fact that  
7 for future infringement the Defendant will be an adjudicated infringer of a valid  
8 patent, and trebles that amount in view of the fact that the future infringement  
9 will be willful as a matter of law; and  
10  
11  
12 g. award Plaintiff such other and further relief as this Court deems just and proper.

13 Dated: March 27, 2023

Respectfully submitted,

RAMEY LLP

/s/ Susan S.Q. Kalra

Susan S.Q. Kalra (CA State Bar No. 16740)  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
Telephone: (800) 993-7499  
Fax: (832) 900-4941

*Southern California Office:*  
811 Wilshire Blvd., 17th Floor  
Los Angeles, CA 90017  
Telephone: (800) 993-7499  
Fax: (832) 900-4941

/s/ William P. Ramey, III

William P. Ramey, III (*pro hac vice* anticipated)  
Texas Bar No. 24027643  
wramey@rameyfirm.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Jeffrey E. Kubiak (*pro hac vice* anticipated)  
Texas Bar No. 24028470  
jkubiak@rameyfirm.com

5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
Telephone: (713) 426-3923  
Fax: (832) 689-9175

***Attorneys for Plaintiff***  
***STREET SPIRIT IP LLC***

**DEMAND FOR JURY TRIAL**

Plaintiff hereby requests a trial by jury on issues so triable by right.

Dated: March 27, 2023

Respectfully submitted,

**RAMEY LLP**

/s/ Susan S.Q. Kalra

Susan S.Q. Kalra (CA State Bar No. 16740)  
skalra@rameyfirm.com  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
Telephone: (800) 993-7499  
Fax: (832) 900-4941

*Southern California Office:*  
811 Wilshire Blvd., 17th Floor  
Los Angeles, CA 90017

/s/ William P. Ramey, III

William P. Ramey, III (*pro hac vice* anticipated)  
Texas Bar No. 24027643  
wramey@rameyfirm.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Jeffrey E. Kubiak (*pro hac vice* anticipated)  
Texas Bar No. 24028470  
jkubiak@rameyfirm.com

5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
Telephone: (713) 426-3923  
Fax: (832) 689-9175

***Attorneys for Plaintiff***  
***STREET SPIRIT IP LLC***