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Attorney for Plaintiff
Web 2.0 Technologies, LLC

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

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WEB 2.0 TECHNOLOGIES, LLC, Plaintiff, v. FREEDCAMP, INC., Defendant.	Case No. 2:23-cv-2246 **COMPLAINT FOR PATENT INFRINGEMENT** **DEMAND FOR JURY TRIAL**

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1   Plaintiff Web 2.0 Technologies, LLC ("Web 2.0 Technologies" or

2   "Plaintiff") files this Complaint against Freedcamp, Inc. ("Defendant" or

3   "Freedcamp"), seeking damages and other relief for patent infringement, and

4   alleges with knowledge to its own acts, and on information and belief as to

5   other matters, as follows:

6   **NATURE OF THE ACTION**

7   1.   This is an action for patent infringement arising under the Patent Laws

8   of the United States, 35 U.S.C. § 1 *et seq.*

9   **THE PARTIES**

10   2.   Plaintiff Web 2.0 Technologies LLC ("Web 2.0 Technologies") is a

11   Texas limited liability corporation with its principal place of business at 5900

12   Balcones Dr., Ste 100, Austin, TX 78731-4298.

13   3.   Plaintiff Web 2.0 Technologies is the owner by assignment of 100%

14   interest in the Asserted Patents.

15   4.   On information and belief, Freedcamp, Inc., ("Defendant" or

16   "Freedcamp"), is a corporation organized and existing under the laws of California,

17   with its principal place of business at 3066 Foothill Rd, Santa Barbara, CA 93105.

18   Freedcamp may be served with process through its California registered agent

19   (Angel Grablev 3066 Foothill Rd Santa Barbara, CA 93105).

20   **JURISDICTION AND VENUE**

21   5.   This action for patent infringement arises under the patent laws of the

22   United States, Title 35 of the United States Code.

23   6.   This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331

24   and 1338(a).

25   7.   Defendant Freedcamp is subject to this Court's general personal

26   jurisdiction. Defendant Freedcamp, Inc. is a California Corporation. *See Daimler*

27   *AG v. Bauman*, 571 U.S. 117, 137, 134 S. Ct. 746, 760 (2014) ([T]he place

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1   of incorporation and principal place of business are 'paradig[m] . . . bases for

2   general jurisdiction") (internal citations omitted).

3   8.   Defendant Freedcamp is subject to this Court's general and specific

4   personal jurisdiction because Freedcamp has sufficient minimum contacts within

5   the State of California and this District, pursuant to due process and/or the

6   California Long Arm Statute, Cal. Code Civ. Proc § 410.10. On information and

7   belief, Defendant Freedcamp contracted with one or more Califorian residents in

8   this District and one or both parties performed the contract at least in part in the

9   State of California and this District; Freedcamp committed the tort of patent

10   infringement in the State of California and this District; Freedcamp purposefully

11   availed itself of the privileges of conducting business in the State of California and

12   in this District; Freedcamp regularly conducts and solicits business within the State

13   of California and within this District; Plaintiff's causes of action arise directly from

14   Freedcamp's business contacts and other activities in the State of California and

15   this District; and Freedcamp distributes, makes available, imports, sells and offers

16   to sell products and services throughout the United States, including in this judicial

17   District, and introduces infringing products and services that into the stream of

18   commerce knowing that they would be used and sold in this judicial district and

19   elsewhere in the United States.

20   9.   On information and belief, Defendant Freedcamp designs, develops,

21   sells, offers to sell, and/or imports products, devices, systems, and/or components

22   of systems through certain accused instrumentalities that either infringe or support

23   the infringement of the patents asserted in this action.

24   10.   On information and belief, Freedcamp sells and offers to sell products

25   and services throughout the United States and in California, including in this

26   District, through the accused instrumentalities, through its website accessible in the

27   United States, and in concert and partnership with third parties.

1   11.   Furthermore, personal jurisdiction over Freedcamp in this action

2   comports with due process. Freedcamp has conducted and regularly conducts

3   business within the United States and this District. Freedcamp has purposefully

4   availed itself of the privileges of conducting business in the United States, and

5   more specifically in the State of California and this District. Freedcamp has sought

6   protection and benefit from the laws of the State of California by making available

7   products and services that infringe the Asserted Patents with the awareness and/or

8   intent that they will be used (or visited) by consumers in this District. Having

9   purposefully availed itself of the privilege of conducting business within this

10   District, Freedcamp should reasonably and fairly anticipate being brought into

11   court here.

12   12.   Venue is proper in this judicial district under 28 U.S.C. § 1391 and 28

13   U.S.C. § 1400(b). On information and belief, Freedcamp's acts of infringement

14   have taken place within this District.

15   13.   Additionally, Freedcamp—directly or through intermediaries

16   (including distributors, retailers, and others), subsidiaries, alter egos, and/or

17   agents—ships, distributes, offers for sale, and/or sells its products and services in

18   the United States and this District. Freedcamp has purposefully and voluntarily

19   placed one or more of its products into the stream of commerce through the

20   accused instrumentalities that infringe the patents asserted in this action with the

21   awareness and/or intent that they will be purchased by consumers in this District.

22   Freedcamp knowingly and purposefully delivers infringing products into, and

23   within, this District. These infringing products have been, and continue to be,

24   purchased by consumers and businesses in this District.

THE ASSERTED PATENTS

26   14.   On March 13, 2007, the United States Patent and Trademark Office

27   ("USPTO") duly and legally issued U.S. Patent No. 6.845,448 B1 ("the '448

COMPLAINT FOR PATENT INFRINGEMENT   CASE NO. 2:23-CV-2246

1 Patent"), entitled "Online Repository for Personal Information." A copy of the

2 '448 Patent is attached hereto as Exhibit 1.

3   15.   Plaintiff owns all substantial right, title, and interest in the '448

4 Patent, and holds the right to sue and recover damages for infringement thereof,

5 including past infringement.

6   16.   On February 14, 2012, the USPTO duly and legally issued U.S. Patent

7 No. 8,117,644 ("the '644 Patent"), entitled "Method and System for Online

8 Document Collaboration." A copy of the '644 Patent is attached hereto as Exhibit

9 2.

10   17.   Plaintiff owns all substantial right, title, and interest in the '644

11 Patent, and holds the right to sue and recover damages for infringement thereof,

12 including past infringement.

13   **COUNT I - INFRINGEMENT OF U.S. PATENT NO. 6,845,448**

14   18.   Plaintiff incorporates and realleges the preceding paragraphs as if

15 fully set forth herein.

16   19.   The '448 Patent is directed to a method and system for gathering,

17 storing personal information on a server computer and releasing such information

18 to authorized requesters, as described and claimed in the '448 Patent.

19   20.   Defendant has had actual knowledge of the '448 Patent and that its

20 activities constitute infringement of the same at least since on or about June 15,

21 2021—the date on which Defendant received notice from Plaintiffs that such

22 activities infringed the '448 Patent.

23   21.   Defendant has and continues to directly and jointly infringe at least

24 Claim 1 of the '448 Patent, in this judicial District and elsewhere in the United

25 States, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of

26 equivalents, by, among other things, by making, using, selling, offering to sell,

27 and/or importing in or into the United States, without authority, software

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1 applications to provide a method for automatically sharing portions of personal

2 information with customers, users and members via products offered by

3 Freedcamp, including Freedcamp's platform——"All Your Favorite Business

4 Collab Tools In One Place"—including but not limited to its constituent sub-

5 products for "Tasks," "Time," "Project Overview," "Discussions," "Files," "Issue

6 Tracker," "Milestones," "Calendar," and "Wiki" functionality and content offered

7 for sale and use via https://freedcamp.com (hereinafter, the "'448 Accused

8 Instrumentalities"), as shown below.

9   22.   For example, the '448 Accused Instrumentalities establishes an

10 account for all users—including the first party—on Freedcamp's server computer,

11 as shown below:

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Login

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15   Email Address

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17   Password

18   Keep me logged in for 2 weeks

19

20   Continue with Email Address

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22 *See, e.g.,* https://freedcamp.com/login (last visited Feb. 17, 2023).

23   23.   The '448 Accused Instrumentalities assign an identifier to every user

24 participating in Freedcamp projects—including the first party—as shown below:

25 | user_id | The user id of the session user |
26 | --- | --- |

27 *See, e.g.,* https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab (last

5

1   visited, Feb. 17, 2023).

```
"projects": [
    {
        "project_id": "914936",
        "role_name": "User",
        "role_type": "0",
        "project_name": "sdcscsdcscsdc",
        "project_description": "sdcsdcsdcsdcsdc",
        "project_color": "A86D54",
        "f_active": true,
        "project_unique_name": "by_api_60I",
        "f_favorite": false,
        "f_can_delete": false,
        "f_can_manage": false,
        "f_can_leave": true,
        "notifications_count": 0,
        "users": [
          132942,
          309953,
          340312,
          377037,
          377039,
          377040
        ],
        "applications": [
                6
          ]
    },
    "groups": [....],
    ...
]
```

See, e.g.,   https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab (last visited, Feb. 17, 2023).

24.   The '448 Accused Instrumentalities allow the entering of the first party's information including a plurality of information objects—including the first party's personal information such as name, email address, skills, role, and job title.

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12   *See*, https://blog.freedcamp.com/2017/04/11/new-public-profile/ (last visited Feb.

13   17, 2023).

14   25.   In the '448 Accused Instrumentalities, the Freedcamp platform sets

15   access permissions, user permissions and permissions within each app.

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25   *See, e.g.*, https://freedcamp.com/about/permissions (last visited, Feb. 17, 2023).

26   Freedcamp enables users with the appropriate permissions to access selected

27   portions of the first party's personal information, for example through use of the

7

1   "avatars" feature throughout Freedcamp.

14   *See, e.g.*,   https://blog.freedcamp.com/2017/04/11/new-public-profile/ (last visited,

15   Feb. 17, 2023). Users with the appropriate permissions may also access "private"

16   communications and "private" Wiki entries.

23   *See, e.g.*,   https://blog.freedcamp.com/2017/04/11/new-public-profile (last visited,

24   Feb. 17, 2023).

25   26.   The'448 Accused Instrumentalities store in Freedcamp's database the

26   first party identifier (user ID), and the associated permissions (security level), as

27   shown below:

8

/users/user_id - returns "users" array containing only specified user data, if the current user has permissions to see him. Empty "users" array otherwise

See, e.g.,

https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab#examples_fcu_2 (last visited, Feb. 17, 2023).

users: array with requested users data. Structure example:

```
    "users": {
      [
        "user_id": "132942",
        "first_name": "f",
        "last_name": "",
        "avatar_url": "https:\\/\\/freedcamp-avatars-
test.s3.amazonaws.com\\/4b322be59237277135526b97d1e86de2.jpg",
        "full_name": "f",
        "email": "bear@test.com",
        "timezone": "America/New_York"
      ],
      [
        "user_id": "132944",
        "first_name": "fsdc",
        "last_name": "sdcd",
        "avatar_url": "https:\\/\\/freedcamp-avatars-
test.s3.amazonaws.com\\/4b33322be59237277135526b97d1e86de2.jpg",
        "full_name": "f s.",
        "email": null,
        "timezone": "America/New_York"
      ],
      ...
```

See, e.g.,

https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab#examples_fcu_2 (last visited, Feb. 17, 2023).

Note: "email" field is **null** if requesting user does not have permissions to see it.

See, e.g.,

https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab#examples_fcu_2 (last visited, Feb. 17, 2023).

27.   The '448 Accused Instrumentalities receive a request, said request comprising at least the first party identifier. For example, the '448 Accused Instrumentalities receive a request to view a specific user based on the first party identifier.

users: array with requested users data. Structure example:

```
"users": {
  [
    "user_id": "132942",
    "first_name": "f",
    "last_name": "",
    "avatar_url": "https:\\/\\/freedcamp-avatars-
test.s3.amazonaws.com\\/4b322be59237277135526b97d1e86de2.jpg",
    "full_name": "f",
    "email": "bear@test.com",
    "timezone": "America/New_York"
  ],
  [
    "user_id": "132944",
    "first_name": "fsdc",
    "last_name": "sdcd",
    "avatar_url": "https:\\/\\/freedcamp-avatars-
test.s3.amazonaws.com\\/4b33322be59237277135526b97d1e86de2.jpg",
    "full_name": "f s.",
    "email": null,
    "timezone": "America/New_York"
  ],
  ...
```

See, e.g., https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab#examples_fcu_2 (last visited, Feb. 17, 2023).

28.   In response to the request to the view a specific user, the '448 Accused Instrumentalities selects, the first party's personal information objects that could be transmitted to the second party. *See supra.*

29.   In response to the request to view a specific user, the '448 Accused Instrumentalities selects, transmits, and displays the first party's personal information objects to the second party. *See supra.*

30.   The '448 Accused Instrumentalities encrypt all traffic in transit and rest.

◪ Data Encryption In Transit and At Rest

The Freedcamp services support the latest recommended secure cipher suites and protocols to encrypt all traffic in transit and rest. We monitor the changing cryptographic landscape closely and work promptly to upgrade the service to respond to new cryptographic weaknesses as they are discovered and implement best practices as they evolve.

See, e.g., https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/SOcab (last visited, Feb. 17, 2023).

31.   To enable user permissions, the '448 Accused Instrumentalities obtain the second party identifier to determine whether the user has access to particular sets of data, such as the ability to access the user profile of another.

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> /users/user_id - returns "users" array containing only specified user data, if the current user has permissions to see him. Empty "users" array otherwise

See, e.g.,

3

https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab#examples_fcu

4

_2 (last visited, Feb. 17, 2023).

5

32.   On information and belief, the'448 Accused Instrumentalities record

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all internal systems access by every user, including whether a request for

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information failed due to lack of authorization.

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> **Logging**

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> Freedcamp maintains an extensive, centralized logging environment in its production environment which contains information pertaining to security, monitoring, availability, access, and other metrics about the Freedcamp services.

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See, e.g., https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/SOcab (last

11

visited, Feb. 17, 2023).

12

33.   To enable user permissions discussed *supra*, the '448 Accused

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Instrumentalities must reject the second party's request for information where the

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second party is not authorized.

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> /users/user_id - returns "users" array containing only specified user data, if the current user has permissions to see him. Empty "users" array otherwise

16

See, e.g.,

17

https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab#examples_fcu

18

_2 (last visited, Feb. 17, 2023).

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34.   Attached hereto as Exhibit 3, and incorporated by reference herein, is

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a claim chart detailing how the '448 Accused Instrumentalities satisfy each

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element of at least independent claim 1 of the '448 patent, literally or under the

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doctrine of equivalents.

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35.   Discovery is expected to uncover the full extent of Defendant's

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infringement of the '448 Patent beyond the '448 Accused Instrumentalities already

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identified through public information.

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36.   Defendant has directly and jointly infringed the '448 Patent and is thus liable for direct and joint infringement of the '448 Patent pursuant to 35 U.S.C. § 271.

37.   Plaintiff has suffered, and continue to suffer, damages as a result of Defendant's infringement of the '448 Patent.

38.   Plaintiff reserves the right to modify its infringement theories as discovery progresses in this case. Plaintiff shall not be estopped for purposes of its infringement contentions or its claim constructions by the foregoing discussions on how the '448 Accused Instrumentalities infringe the '448 Patent. Plaintiff intends only that the foregoing discussions satisfy the notice requirements of Rule 8(a)(2) of the Federal Rule of Civil Procedure, and that they should not be construed as Plaintiff's preliminary or final infringement contentions or preliminary or final claim construction positions.

COUNT II - INFRINGEMENT OF U.S. PATENT NO. 8,117,644

39.   Plaintiff incorporates and realleges the preceding paragraphs as if fully set forth herein.

40.   The '644 Patent is directed to method and system for online document collaboration, as described and claimed in the '644 Patent.

41.   Defendant has had actual knowledge of the '644 Patent and that its activities constitute infringement of the same at least since on or about June 15, 2021—the date on which Defendant received notice from Plaintiffs that such activities infringed the '644 Patent.

42.   Defendant has and continues to directly and jointly infringe at least Claim 1 of the '644 Patent, in this judicial District and elsewhere in the United States, pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by, among other things, making, using, selling, offering to sell, and/or importing in or into the United States, without authority, software applications that

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1   facilitate secure collaboration on editing, viewing and sharing documents online

2   with multiple parties, including, without limitation, collaboration products such as

3   Freedcamp's platform—"All Your Favorite Business Collab Tools In One

4   Place"—including but not limited to its constituent sub-products for "Tasks,"

5   "Time," "Project Overview," "Discussions," "Files," "Issue Tracker,"

6   "Milestones," "Calendar," and "Wiki" functionality and content offered for sale

7   and use via https://freedcamp.com (hereinafter, the "'644 Accused

8   Instrumentalities"), as shown below:
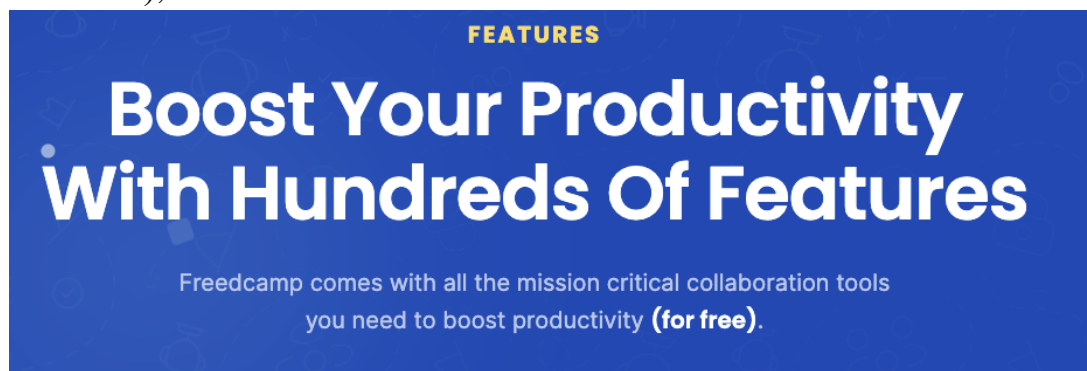
15   *See* https://freedcamp.com/about/features (last visited Feb 17, 2023).

16   43.   The '644 Accused Instrumentalities allows for multiple users to

17   establish an account on its website over the internet. For example, a Freedcamp

18   user can collaborate with multiple users, each with an account on Freedcamp's

19   server(s).

24   *See, e.g.*, https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/7yaab (last

25   visited Feb. 17, 2023).

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A BETTER WAY TO MANAGE

Every User Has A Different Role In Projects

There can be a lot of people involved in any given project. From team members, to clients, there are lots of stakeholders that need to be considered. Sometimes, you want them to monitor progress or comment on something, but you don't want to give them to see other projects for other clients (or have editing rights to their projects).

We make that possible.

See, e.g., https://freedcamp.com/about/permissions (last visited Feb. 17, 2023).

44.   The '644 Accused Instrumentalities allows for a ("first user") to create and store multiple documents, for example the "FileEdit" and "Wiki" elements of the Freedcamp platform store on the Freedcamp servers a document created by the first user.

FILE EDIT WILL HELP YOU TO

Edit Faster

Making edits to docs, especially light ones, shouldn't require a lot of effort. FileEdit eliminates the manual steps, by automating the whole process.

When you launch FileEdit, the file automatically downloads and accesses the program you need to make your edits (like Word or Figma). You make the changes you need. And FileEdit uploads it for you when you're done.

See, e.g., https://freedcamp.com/about/file_edit (last visited Feb. 17, 2023).

A BETTER WAY TO MANAGE

The Single Source Of Information Your Team Needs

You and your team are going to have questions about a project, even if it's something you've done before. It's only natural. People forget things, notes get misplaced, or it's been a while since you've worked with a particular client. We get it. We don't like the endless meetings either, especially when it involves covering information we've already talked about.

That's why we built our Wiki tool.

See, e.g., https://freedcamp.com/about/wiki (last visited Feb. 17, 2023).

45.   The '644 Accused Instrumentalities associates a set of access restrictions with the document, including an ability to access the document by

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modification by one of a first group of users. For example, the Freedcamp

platform sets access permissions enabling the first party to control who has access

to the project and whether—once granted access—what they can do to any

particular information object.

Management Tools And Permissions For Administrators

Permissions and management tools are available to users, regardless of the plan you're using to ensure that everything runs smoothly.
On a permissions level, you have complete control over who can do or see what within Freedcamp. On a high level, each app within Freedcamp can be managed in an incredibly detailed way that limits what individual users can do.

See, e.g., https://freedcamp.com/about/permissions (last visited Feb. 17, 2023).

Once You Turn FileEdit On, You Can…

| Launch FileEdit to edit files online. | Edit files directly from attachments. | Access the file while editing a task. | Manage edit permissions. |

See, e.g., https://freedcamp.com/about/file_edit (last visited Feb. 17, 2023).

46.   The '644 Accused Instrumentalities allows a second user to request to

modify the document. For example, once a Freedcamp user has been granted

access to a project, they may request to modify its constituent elements by passing

their user id along with the request to modify by accessing the Freedcamp's

"FileEdit."

15
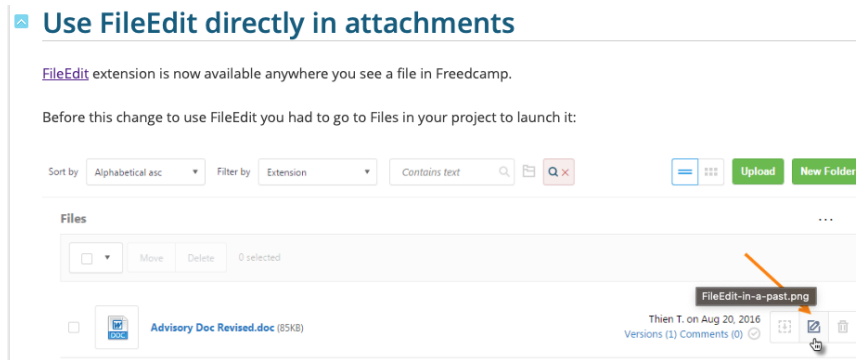
See, e.g., https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/4xbab (last visited, Feb. 17, 2023).

47.   In each case, the user must log into the Freshworks server using their identification information, which accompanies their request to modify the document.

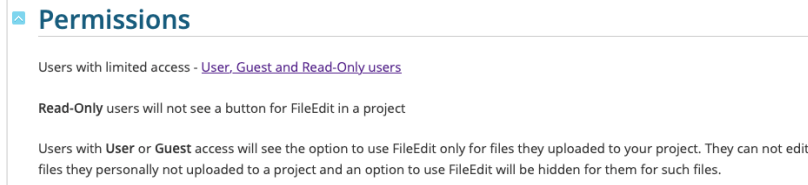*See, e.g.,* https://freedcamp.com/login (last visited Feb. 17, 2023).

48.   The '644 Accused Instrumentalities verifies the identity of the second user by use of a unique user name, as well as forms-based authentication (username and password). *See supra* (showing login form).

See, e.g., https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/DFaab

16

1   (last visited, Feb. 17, 2023).

2   49.   The '644 Accused Instrumentalities has highly customizable

3   permissions whereby the platform permits the second user to modify the document

4   based upon their individual access rights.

5

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8   *See, e.g.*, https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/4xbab (last

9   visited Feb. 17, 2023).

10   50.   The '644 Accused Instrumentalities permits receiving "approval or

11 disapproval" for modifications. Freedcamp implements version control for files

12 stored on the Freedcamp servers, permitting approving or disapproving

13 modifications from one or more users.
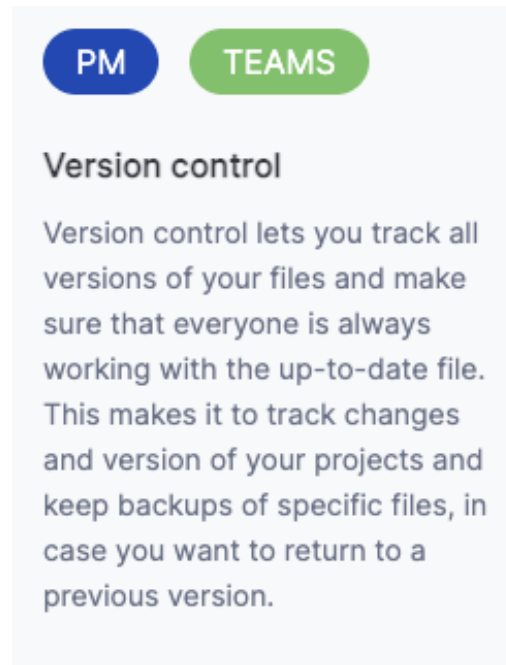
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24 *See, e.g.*, https://freedcamp.com/about/files (last visited, Feb. 17, 2022).

25   51.   The '644 Accused Instrumentalities, stores the identifying information

26 of one or more users who approved or disapproved of modifications to the

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52.   document. On information and belief, Freedcamp logs the identifying information of users who edited or revised the document, including approving or disapproving of any such modifications.

◪ **Logging**

Freedcamp maintains an extensive, centralized logging environment in its production environment which contains information pertaining to security, monitoring, availability, access, and other metrics about the Freedcamp services.

See, e.g., https://freedcamp.com/help_/tutorials/wiki/wiki_public/view/SOcab (last visited, Feb. 17, 2023).

53.   Attached hereto as Exhibit 4, and incorporated by reference herein, is a claim chart detailing how the '644 Accused Instrumentalities satisfy each element of at least independent claim 1 of the '644 patent, literally or under the doctrine of equivalents.

54.   Discovery is expected to uncover the full extent of Defendant's infringement of the '644 Patent beyond the '644 Accused Instrumentalities already identified through public information.

55.   Defendant has directly and jointly infringed the '644 Patent and is thus liable for direct and joint infringement of the '644 Patent pursuant to 35 U.S.C. § 271.

56.   Plaintiff has suffered, and continues to suffer, damages as a result of Defendant's infringement of the '644 Patent.

57.   Plaintiff reserves the right to modify its infringement theories as discovery progresses in this case. Plaintiff shall not be estopped for purposes of its infringement contentions or its claim constructions by the foregoing discussions on how the '644 Accused Instrumentalities infringe the '644 Patent. Plaintiffs intend only that the foregoing discussions satisfy the notice requirements of Rule 8(a)(2) of the Federal Rule of Civil Procedure, and that they should not be construed as Plaintiff's preliminary or final infringement contentions or preliminary or final claim construction positions.

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PRAYER FOR RELIEF

2   WHEREFORE, Plaintiff demands judgment for itself and against Defendant

3   as follows:

4   A.   A judgment that Defendant has directly and jointly infringed one or

5   more claims of each of the Asserted Patents;

6   B.   A judgment awarding Plaintiff all damages adequate to compensate

7   for Defendant's infringement, and in no event less than a reasonable royalty for

8   Defendant's acts of infringement, including all pre-judgment and post-judgment

9   interest at the maximum rate allowed by law;

10   C.   A judgment and order finding that this is an exceptional case within

11   the meaning of 35 U.S.C. § 285 and awarding Plaintiff its reasonable attorneys'

12   fees.

13   D.   A judgment awarding Plaintiff such other relief as the Court may

14   deem just and equitable.

15

DEMAND FOR JURY TRIAL

16   Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff

17   demands a trial by jury of this action.

18
     Dated: March 27, 2023   DEVLIN LAW FIRM LLC
19
                                              /s/ Alex Chan
20   Alex Chan
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21   1526 Gilpin Ave.
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COMPLAINT FOR PATENT INFRINGEMENT   CASE NO. 2:23-CV-2246