IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WEB 2.0 TECHNOLOGIES LLC,	
Plaintiff,	**Civil Action No. _____**
v.	
CREATECH GROUP INC., D/B/A GOODDAY,	**DEMAND FOR JURY TRIAL**
Defendant.	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Web 2.0 Technologies, LLC. ("Web 2.0 Technologies" or "Plaintiff") files this Complaint against Defendant Createch Group Inc., d/b/a GoodDay ("Defendant" or "GoodDay"), seeking damages and other relief for patent infringement, and alleges with knowledge to its own acts, and on information and belief as to other matters, as follows:

NATURE OF THE ACTION

1.   This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq*.

THE PARTIES

2.   Plaintiff Web 2.0 Technologies LLC ("Web 2.0 Technologies") is a Texas limited liability corporation with its principal place of business at 5900 Balcones Dr., Ste 100, Austin, TX 78731-4298.

3.   Plaintiff Web 2.0 Technologies is the owner by assignment of 100% interest in the Asserted Patents.

4.   On information and belief, Defendant Createch Group Inc., d/b/a GoodDay

("GoodDay") is a corporation organized and existing under the laws of Delaware, with its

principal place of business at 1565 Scenic Avenue, Costa Mesa, California 92626. GoodDay is a

Delaware corporation and may be served with process through its California registered agent

(1505 Corporation 1257, Incorp Services, Inc., 5716 Corsa Ave Suite 110, Westlake Village, CA

91362) or its Delaware registered agent (Valis Group Inc., 501 Silverside Rd Ste 105,

Wilmington, De 19809).

JURISDICTION AND VENUE

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

States, Title 35 of the United States Code.

6.   This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

7.   Defendant GoodDay is subject to this Court's general personal jurisdiction.

GoodDay is a Delaware corporation. *See Daimler AG v. Bauman*, 571 U.S. 117, 137, 134 S. Ct.

746, 760 (2014) ([T]he place of incorporation and principal place of business are 'paradig[m] . . .

bases for general jurisdiction") (internal citations omitted).

8.   Defendant GoodDay is additionally subject to this Court's general and specific

personal jurisdiction because GoodDay has sufficient minimum contacts within the State of

Delaware and this District, pursuant to due process and/or the Delaware Long Arm Statute, Del.

Code. Ann. Tit. 3, § 3104.   On information and belief, Defendant GoodDay contracted with one

or more Delaware residents in this District and one or both parties performed the contract at least

in part in the State of Delaware and this District; GoodDay committed the tort of patent

infringement in the State of Delaware and this District; GoodDay purposefully availed itself of

the privileges of conducting business in the State of Delaware and in this District; GoodDay

regularly conducts and solicits business within the State of Delaware and within this District;

Plaintiff's causes of action arise directly from GoodDay's business contacts and other activities

in the State of Delaware and this District; and GoodDay distributes, makes available, imports,

sells and offers to sell products and services throughout the United States, including in this

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

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

United States.

9.   On information and belief, Defendant GoodDay designs, develops, sells, offers to

sell, and/or imports products, devices, systems, and/or components of systems through certain

accused instrumentalities that either infringe or support the infringement of the patents asserted

in this action.

10.   On information and belief, GoodDay sells and offers to sell products and services

throughout the United States and in Delaware, including in this District, through the accused

instrumentalities, through its website accessible in the United States, and in concert and

partnership with third parties.

11.   Furthermore, personal jurisdiction over GoodDay in this action comports with due

process. GoodDay has conducted and regularly conducts business within the United States and

this District. GoodDay has purposefully availed itself of the privileges of conducting business in

the United States, and more specifically in the State of Delaware and this District. GoodDay has

sought protection and benefit from the laws of the State of Delaware by making available

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

they will be used (or visited) by consumers in this District. Having purposefully availed itself of

the privilege of conducting business within this District, GoodDay should reasonably and fairly

anticipate being brought into court here.

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

1400(b). On information and belief, GoodDay is a Delaware corporation. On information and

belief, GoodDay's acts of infringement have taken place within this District..

13.   Additionally, GoodDay —directly or through intermediaries (including

distributors, retailers, and others), subsidiaries, alter egos, and/or agents—ships, distributes,

offers for sale, and/or sells its products and services in the United States and this District. GoodDay has purposefully and voluntarily placed one or more of its products into the stream of commerce through the accused instrumentalities that infringe the patents asserted in this action with the awareness and/or intent that they will be purchased by consumers in this District. GoodDay knowingly and purposefully delivers infringing products into, and within, this District. These infringing products have been, and continue to be, purchased by consumers and businesses in this District.

<div align="center">

THE ASSERTED PATENTS

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14.   On March 13, 2007, the United States Patent and Trademark Office ("USPTO") duly and legally issued U.S. Patent No. 6.845,448 B1 ("the '448 Patent"), entitled "Online Repository for Personal Information." A copy of the '448 Patent is attached hereto as Exhibit 1.

15.   Plaintiff owns all substantial right, title, and interest in the '448 Patent, and holds the right to sue and recover damages for infringement thereof, including past infringement.

16.   On February 14, 2012, the USPTO duly and legally issued U.S. Patent No. 8,117,644 ("the '644 Patent"), entitled "Method and System for Online Document Collaboration." A copy of the '644 Patent is attached hereto as Exhibit 2.

17.   Plaintiff owns all substantial right, title, and interest in the '644 Patent, and holds the right to sue and recover damages for infringement thereof, including past infringement.

<div align="center">

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

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

19.   The '448 Patent is directed to a method and system for gathering, storing personal information on a server computer and releasing such information to authorized requesters, as described and claimed in the '448 Patent.
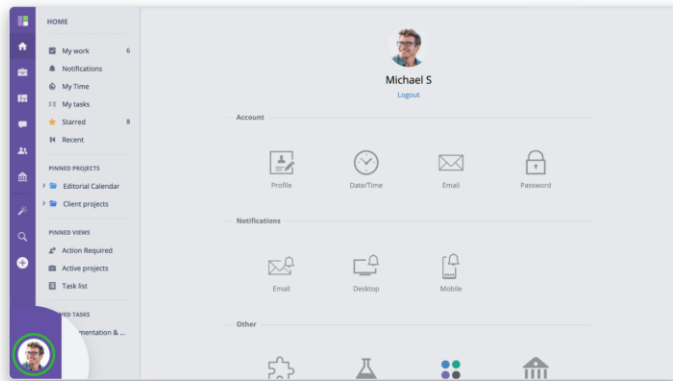
20.   Defendant has had actual knowledge of the '448 Patent and that its activities constitute infringement of the same at least since on or about June 15, 2021—the date on which Defendant received notice from Plaintiffs that such activities infringed the '448 Patent.

21.   Defendant has and continues to directly infringe at least Claim 1 of the '448

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, by making, using,

selling, offering to sell, and/or importing in or into the United States, without authority, software

applications to provide a method for automatically sharing portions of personal information with

customers, users and members via products offered by GoodDay, including GoodDay's "modern

work management platform"—and its constituent "views," such as "Task management,"

"Planning," "Management," "Events & Milestones," "Collaboration," and "Miscellaneous," and

content offered for sale and use via https://www.goodday.work (hereinafter, the "'448 Accused

Instrumentalities"), as shown below.

22.   For example, the '448 Accused Instrumentalities establishes an account for all

users—including the first party—on GoodDay's server computer, as shown below:

See, e.g., https://www.goodday.work/help/overview-my-account (last visited, Dec. 20, 2022).

23.   The '448 Accused Instrumentalities assign an identifier (a unique user name) for all users—including the first party—as shown below.

User security

Each user in your GoodDay environment has a unique user name (i.e., their email address). We offer forms-based authentication (username and password) and Google Authentication to all users of GoodDay. GoodDay issues a session cookie only to record encrypted authentication information for the duration of a specific session. The session cookie does not include either the user name or password of the user. GoodDay does not use cookies to store other confidential user and session information, but instead implements more advanced security methods based on dynamic data and encoded session IDs. All account login attempts are logged, and account lockout policies can be enabled to lock account access after a certain number of failed login attempts if requested.

Single Sign-On: For Enterprise accounts, GoodDay supports SAML 2.0 integration, which allows you to control access across your organization and define authentication policies for increased security.

See, e.g., https://www.goodday.work/security (last visited, Dec. 20, 2022).

Get organization user

Retrieve organization user details.

`GET` `/user/USER-ID`

```
Response

{
    "id": "USER-ID",
    "companyRole": "User",
    "isAdmin": false,
    "momentCreated": "2018-01-08T15:35:16.648732",
    "name": "Alex Kim",
    "primaryEmail": "alex@company.com",
    "reportsToUserId": "USER-ID"
}
```

See, e.g., https://www.goodday.work/developers/api-v2/users (last visited, Dec. 20, 2022).

24.   The '448 Accused Instrumentalities allow the entering of the first party's information—including a plurality of information objects such as the first party's planned activity, events related to the first party, the first party's workload, and any items requiring the first party's attention, as shown below.

Overview

My Work is one of the most important screens in GoodDay. It gives a clear picture of all relevant work items and allows scheduling, planning, creating, and prioritizing items with a few

www.goodday.work//help/my_work/overview
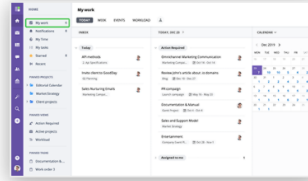
Today

Today view is the default My Work view that displays all planned activity for the selected day as well as new action required tasks. This view is split into 3 columns. …
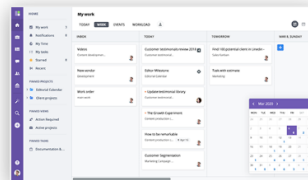
www.goodday.work//help/my_work/today

Week

The My Work Week view displays all work items that require your attention grouped in columns by date these items are scheduled for. It is great when you want to see and schedule
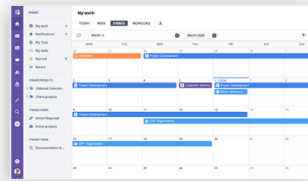
www.goodday.work//help/my_work/week

Events

The Events view is designated to display all related events and deadlines related to your projects and assigned tasks in a calendar view.It is based on Calendar view and supports all of
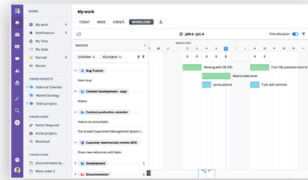
www.goodday.work//help/my_work/events

Workload

My Workload view is designated to help with a personal long term work planning and resource management. It displays assigned to user tasks from all projects in a timeline view and

www.goodday.work//help/my_work/workload

See, e.g., https://www.goodday.work/help/my-work (last visited, Dec. 20, 2022).

25.   "Events" includes personal events, such as sick leaves, vacations, and travel time.

Personal Events

- Overview
- Vacation
- Sick Leave
- Travel
- User Calendar / HR

Overview

Personal events include sick leaves, vacations, and travel time. It's important to schedule them in the calendar so that other team members could plan and coordinate their activity according to those days.

See, e.g., https://www.goodday.work/help/events/personal (last visited, Dec. 20, 2022).

26.   In the '448 Accused Instrumentalities, the manager ("first party") assigns the second party to one of three security levels— "manager," "user," or "guest"—each with declining access to information objects based on their security level. *See, e.g.*, https://www.goodday.work/help/users/roles-access (last visited, Jan. 03, 2023).

Organization Roles

On the organizational level, GoodDay has 3 user roles: Manager, User, and Guest.

- **Manager** has full access to all management options and settings for your organization, except for account administration.
- **User** is the default role in the organization. Users have no access to organization's settings, user management, cannot create folders/projects in the project root (but can create subfolders/subprojects within projects they've been added to).
- **Guest** role is typically granted to users outside of your organization, i.e. contractors or customers. Guest users do not have access to the organization's resources (users/analytics/etc.) and can access only projects they have been added to.

See, e.g., https://www.goodday.work/help/users/roles-access (last visited, Jan. 03, 2023).

27.   The manager ("first party") then adds the second user to one or more projects ("information objects"). The second user "can only see and access the projects they have been added to."

Users & Permissions

Organization users can only see and access the projects they have been added to. You can add a new user and manage existing users in Project users section of your project/folder.

See, e.g., https://www.goodday.work/help/users-permissions (last visited, Jan. 03, 2023).

28.   For each project to which the manager has granted the second user access, the manager ("first party") assigns the second party one of three access levels—full, standard, or limited. *See, e.g.*, https://www.goodday.work/help/users-permissions (last visited, Jan. 03, 2023).

Project Access

There are 3 levels of project access:

*   **Full** - access to all data and management options, usually appropriate for the organization's manager or project managers.
*   **Standard** – users with this level can see all work items (subfolders, tasks, events, etc.) but have no access to project settings and user management.
*   **Limited** – users with this level can only see specific folders and tasks they have been added to. Usually you would grant this level of access to people outside of your organization, e.g. clients, contractors, etc.

See, e.g., https://www.goodday.work/help/users-permissions (last visited, Jan. 03, 2023).

29.   Within a particular project, a manager ("first party") may grant a second party access to the manager's calendar, events, and "My Work" views. The second party may then view the first party's planned activity, events related to the first party, the first party's workload, and any items requiring the first party's attention.
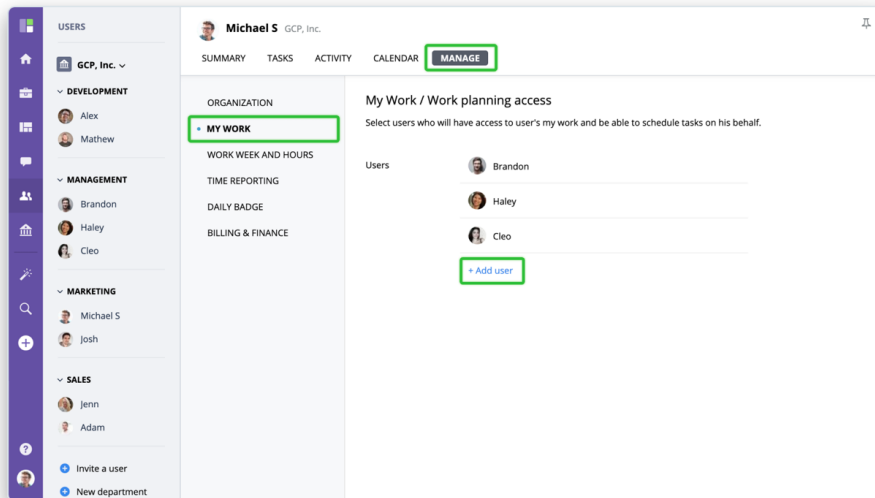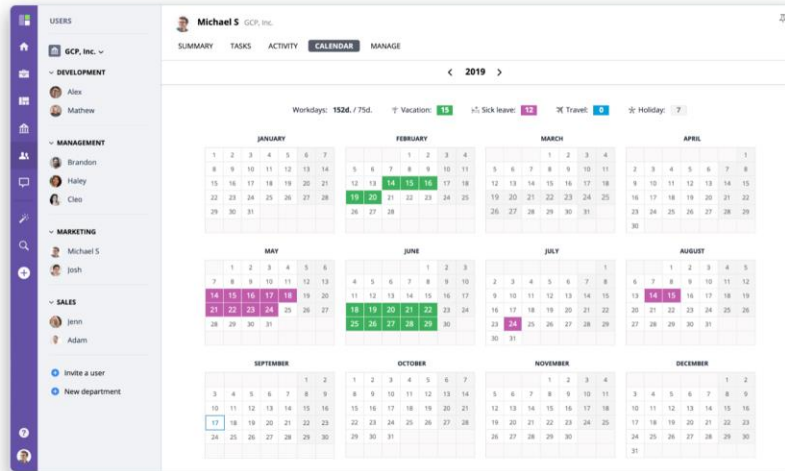

See, e.g., https://www.goodday.work/help/my_work/view_for (last visited, Jan. 03, 2023)..

User Calendar / HR

User Calendar is a very important feature for teamwork planning and HR purposes. User Calendar allows you to see all user's events for the entire year in one place. To access the user calendar, select a person whose calendar you want to see.

Go to People → User → Calendar

On the user's calendar, you will see this person's workdays, vacations, sick leaves, travel days, and holidays.

See, e.g., https://www.goodday.work/help/events/personal (last visited, Jan. 03, 2023) (showing multiple "management" level calendars available for access).

30.   The '448 Accused Instrumentalities store in GoodDay's database the first party identifier (user name), and the associated permissions (security level) including the first party's organization roles and project access assigned to each information object, as shown below).

User security

Each user in your GoodDay environment has a unique user name (i.e., their email address). We offer forms-based authentication (username and password) and Google Authentication to all users of GoodDay. GoodDay issues a session cookie only to record encrypted authentication information for the duration of a specific session. The session cookie does not include either the user name or password of the user. GoodDay does not use cookies to store other confidential user and session information, but instead implements more advanced security methods based on dynamic data and encoded session IDs. All account login attempts are logged, and account lockout policies can be enabled to lock account access after a certain number of failed login attempts if requested.

Single Sign-On: For Enterprise accounts, GoodDay supports SAML 2.0 integration, which allows you to control access across your organization and define authentication policies for increased security.

See, e.g., https://www.goodday.work/security (last visited, Dec. 20, 2022).

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Organization Roles

On the organizational level, GoodDay has 3 user roles: Manager, User, and Guest.

- **Manager** has full access to all management options and settings for your organization, except for account administration.
- **User** is the default role in the organization. Users have no access to organization's settings, user management, cannot create folders/projects in the project root (but can create subfolders/subprojects within projects they've been added to).
- **Guest** role is typically granted to users outside of your organization, i.e. contractors or customers. Guest users do not have access to the organization's resources (users/analytics/etc.) and can access only projects they have been added to.

Project Access

There are 3 levels of access for folders/projects:

- **Full** – access to all data and management options, usually appropriate for the organization's manager or project managers.
- **Standard** – user with this level can see all work items (subfolders, tasks, events, etc.) but has no access to project settings and user management.
- **Limited** – user with this level can only see specific folders and tasks they have been added to. Usually you would grant this level of access to people outside of your organization, e.g. clients, contractors, etc.

To learn more about project access levels, please check Project access article.

See, e.g., https://www.goodday.work/help/users/roles-access (last visited, Dec. 20, 2022).

Project Access

There are 3 levels of project access:

- **Full** - access to all data and management options, usually appropriate for the organization's manager or project managers.
- **Standard** - users with this level can see all work items (subfolders, tasks, events, etc.) but have no access to project settings and user management.
- **Limited** - users with this level can only see specific folders and tasks they have been added to. Usually you would grant this level of access to people outside of your organization, e.g. clients, contractors, etc.

Functionality	Full access	Standard	Limited
Add/Remove users	+	-	-
Manage user roles and access	+	-	-
Manage project/folder settings	+	-	-
Update project status	+	+	-
Create subprojects/folders	+	+	-
Manage subprojects/folders and their statuses	+	+	-
Access all tasks	+	+	*Limited
Manage (edit/move/change status) tasks	+	+	*Limited
Create events	+	*Limited	-
Manage events	+	*Limited	-

See, e.g., https://www.goodday.work/help/users-permissions (last visited, Dec. 20, 2022).

31.   The '448 Accused Instrumentalities receive a request to "access[] and display[] other users' My Work just as if you were logged in to their account|" using the "My Work dashboard" module by clicking the "view for" button and selecting the user ("first party identifier") to view. *See, e.g.,* https://www.goodday.work/help/my_work/view_for (last visited, Dec. 20, 2022).
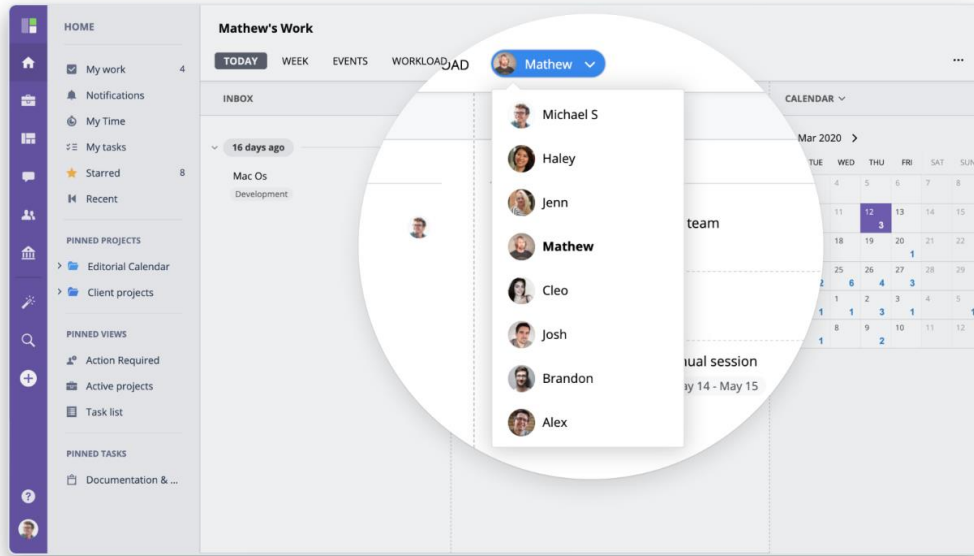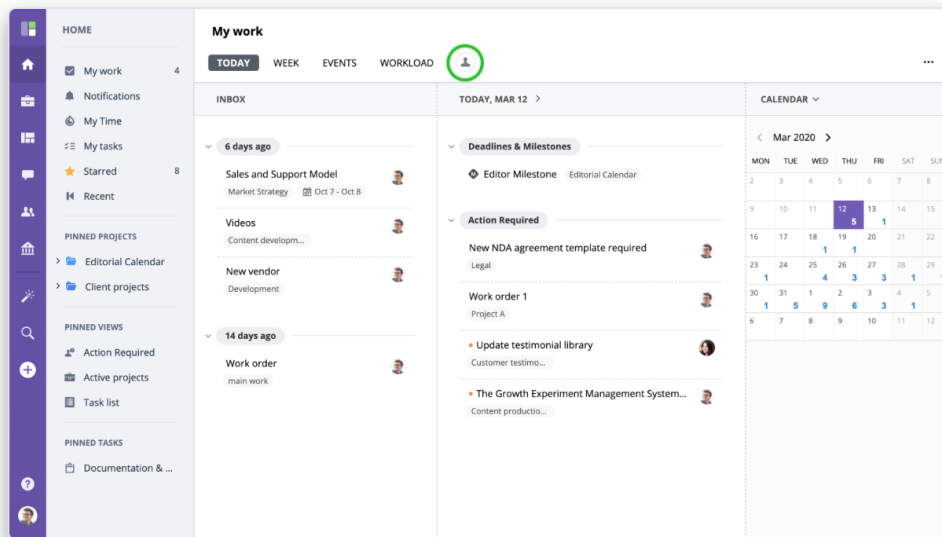
See, e.g., https://www.goodday.work/help/my_work/view_for (last visited, Dec. 20, 2022).

32.   In response to the request, the "My Work dashboard" selects, transmits, and displays the first party's personal information objects to the second party.

View For

My Work dashboard allows accessing and displaying other users' My Work just as if you were logged in to their account. To switch to other user's My Work, click View For button

See, e.g., https://www.goodday.work/help/my_work/view_for (last visited, Dec. 20, 2022).

33.   The '448 Accused Instrumentalities securely transmit the retrieved first portion of personal information objects to the second party "use[ing] some of the most advanced

technologies for Internet security commercially available today." *See,*

https://www.goodday.work/dpa (last visited, Dec. 20, 2022).

Network and system security

Access Control: Secure VPN, 2FA (two-factor authentication), and role-based access are enforced for systems management by authorized engineering staff.

Encryption in Transit: By default, our survey collectors have Transport Layer Security (TLS) enabled to encrypt respondent traffic. All other communications with the GoodDay platform are sent over TLS connections, which protects communications by using both server authentication and data encryption. This ensures that user data in transit is safe, secure, and available only to intended recipients.

Logging and Auditing: Central logging systems capture and archive all internal systems access including any failed authentication attempts.

Testing: System functionality and design changes are verified in an isolated test "sandbox" environment and subject to functional and security testing prior to deployment to active production systems.

See, e.g., https://www.goodday.work/dpa (last visited, Dec. 20, 2022).

34.   The '448 Accused Instrumentalities also encrypt all communications.

Data encryption

GoodDay uses proven transport layer security (TLS) technology from the most trusted providers to encrypt all data transmissions between your device and our servers, commonly referred to as on-the-wire encryption. TLS technology is designed to protect your information by establishing trust of our servers through a trusted third party, and then creating a secure channel through which your data can pass to our servers protected from malicious actors. We also use AES 256 encryption before data is durably stored, commonly referred to as at-rest-encryption. A dedicated firewall provides a strong barrier of network security from the internet and we utilize Amazon's S3 service to store and serve uploaded files.

See, e.g., https://www.goodday.work/dpa (last visited, Dec. 20, 2022).

35.   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.

In GoodDay, there are 2 types of user permissions: organization role and project access.

Organization Role specifies permissions and access on the organizational level, i.e. it defines whether a user can create a folder/project in the root, edit the organization's settings, invite/manage users, access the management views and more.

Project Access determines user permissions and access within a particular folder/project, e.g. access to all tasks, permissions to add new project users, create subprojects, edit project settings, etc.

It is important to understand that the role within the organization does not impact project access. For example, a user with the organization role Manager can have limited access to a specific folder/project, or an administrator may have no access to some of the projects. This architecture allows to avoid potential access issues. For example, you may want to grant a user access to GoodDay settings and allow him to invite new users, while making him unable to access 'HR' or 'Sales' department data.

See, e.g., https://www.goodday.work/help/users/roles-access (last visited, Dec. 20, 2022).

36.   The '448 Accused Instrumentalities record all internal systems access, including any failed authentication attempts.

Logging and Auditing: Central logging systems capture and archive all internal systems access including any failed authentication attempts.

See, e.g., https://www.goodday.work/dpa (last visited, Dec. 20, 2022).

37.   To enable user permissions discussed *supra*, the '448 Accused Instrumentalities must reject the second party's request for information where the second party is not authorized.

38.   Attached hereto as Exhibit 3, and incorporated by reference herein, is a claim chart detailing how the '448 Accused Instrumentalities satisfy each element of at least independent claim 1 of the '448 patent, literally or under the doctrine of equivalents.

39.   Discovery is expected to uncover the full extent of Defendant's infringement of the '448 Patent beyond the '448 Accused Instrumentalities already identified through public information.

40.   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.

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

42.   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

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

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

45.   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.

46.   Defendant has and continues to directly 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 facilitate secure collaboration on editing, viewing and sharing documents online with multiple parties, including, without limitation, collaboration products such as GoodDay's "modern work management platform"—and its constituent "views," such as "Task management," "Planning," "Management," "Events & Milestones," "Collaboration," and "Miscellaneous," and content offered for sale and use via https://www.goodday.work (hereinafter, the "'644 Accused Instrumentalities"), as shown below:
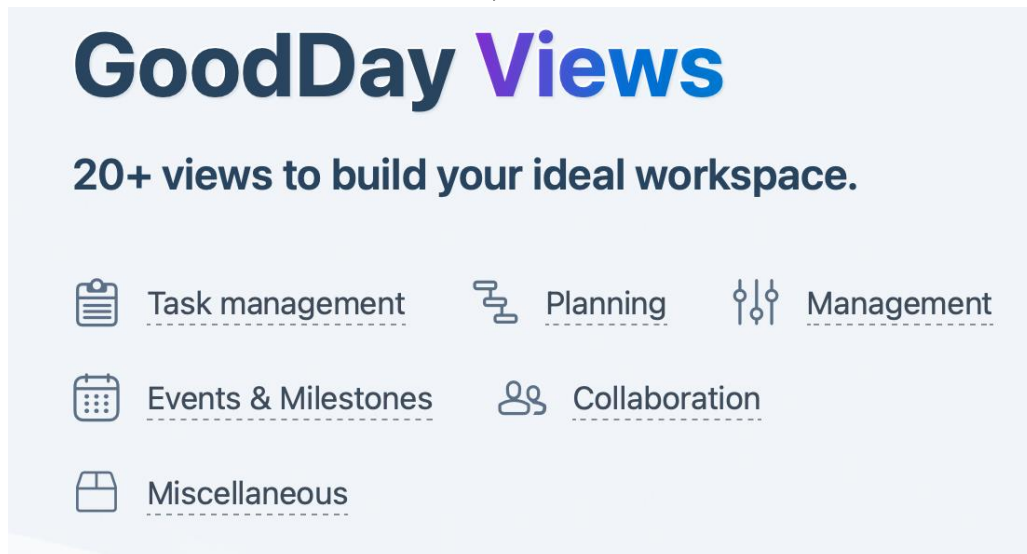
See e.g., https://www.goodday.work/views (last visited Dec. 20, 2022).

47.   The '644 Accused Instrumentalities allows for multiple users to establish an account on its website over the internet. For example, a GoodDay user can collaborate with unlimited users, each with an account on GoodDay's server.
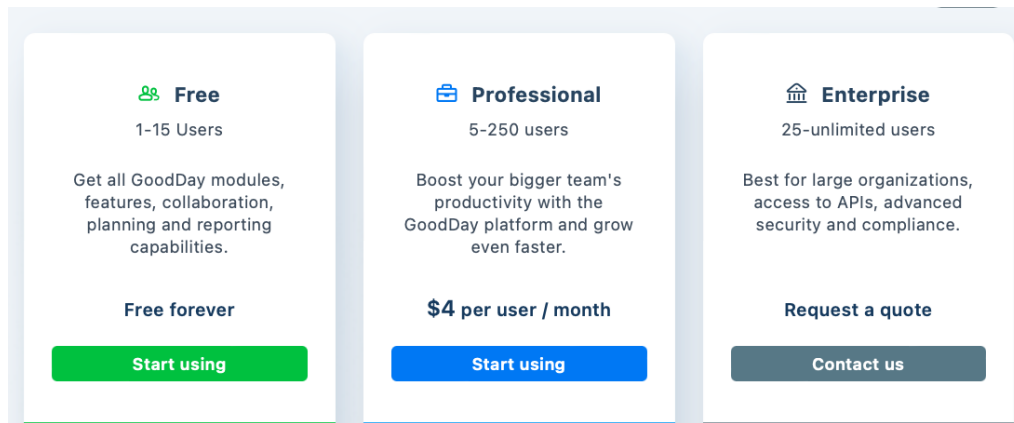
See, e.g., https://www.goodday.work/pricing (last visited Dec. 20. 2022).

48.   The '644 Accused Instrumentalities allows for a "Manager" ("first user") to create and store multiple Projects, Tasks, Activities, and/or Documents ("documents"), on the website's server.

Organization Roles

On the organizational level, GoodDay has 3 user roles: Manager, User, and Guest.

- **Manager** has full access to all management options and settings for your organization, except for account administration.

- **User** is the default role in the organization. Users have no access to organization's settings, user management, cannot create folders/projects in the project root (but can create subfolders/subprojects within projects they've been added to).

- **Guest** role is typically granted to users outside of your organization, i.e. contractors or customers. Guest users do not have access to the organization's resources (users/analytics/etc.) and can access only projects they have been added to.

See, e.g., https://www.goodday.work/help/users/roles-access#admin (last visited, Dec. 20, 2022).

49.   The '644 Accused Instrumentalities allows for the first user to create and store multiple Projects on GoodDay's server:

Overview

GoodDay supports unlimited levels of nesting to organize your projects and workfolders. This gives you full freedom in the way you structure your organization's work.

Setting up the project/folder structure is an important step as this will impact everyone within the organization, so make sure that your project hierarchy is:

- **Well organized** - it should be easy to find things and the structure should feel "native" to your real-life work process flows. By default, we recommend taking the "functional" approach to naming workfolders.

- **Easy to scale** - when you add new projects/teams/etc. in the future, your structure should not require significant changes.

See, e.g., https://www.goodday.work/help/project-structure (last visited Dec. 20, 2022).
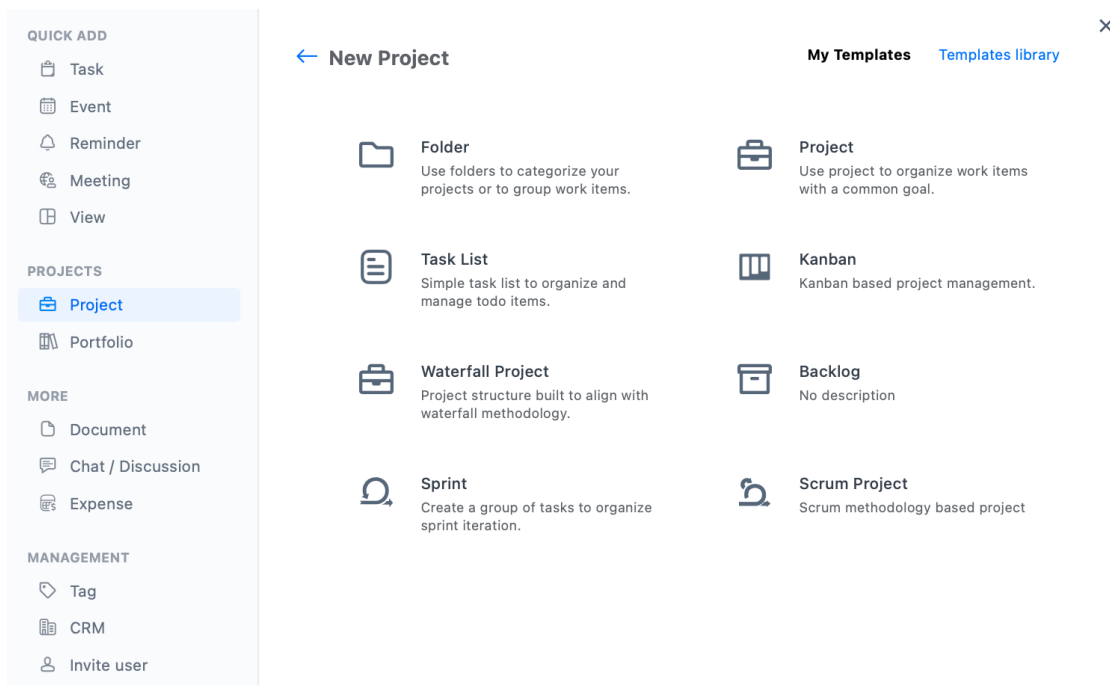

See, e.g., https://www.goodday.work/my-work/today (last visited Dec. 20, 2022) (permitting first user to setup multiple projects).

50.   Additionally, the '644 Accused Instrumentalities allows for the first user to create and store multiple "Tasks" on GoodDay's server:

Creating a Task from the Main Menu

To create a task from any screen or enter advanced settings, click "+" button in the main menu and switch to the "Task" tab.
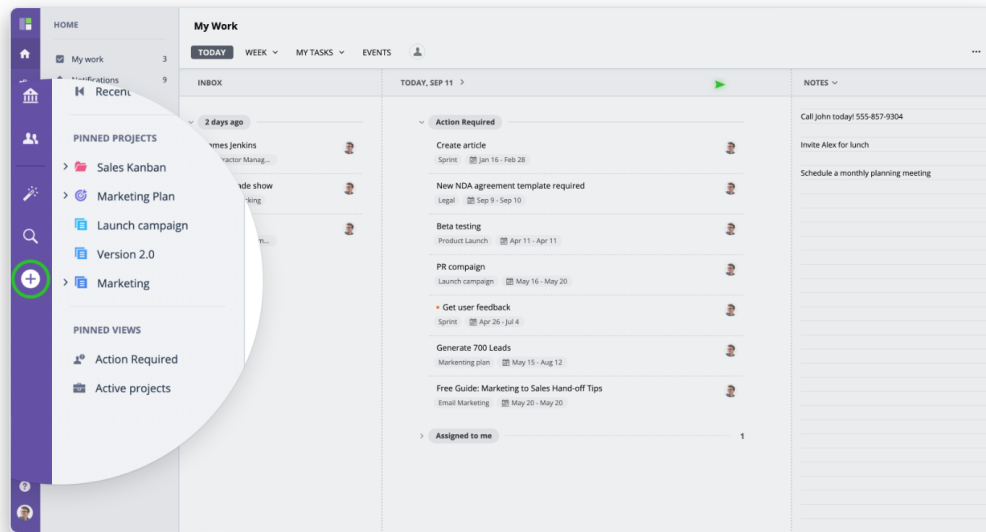

Once on the New Task screen, you will be asked to select a project [1] and a user you want to assign this task to [2] (you can leave the User field blank if you don't want to assign the task at the moment). Select the task type [3] and enter the title [4] and description [5] (optional).

See, e.g., https://www.goodday.work/help/tasks/creating-a-task (last visited Dec. 20, 2022).

51.   The '644 Accused Instrumentalities also allows for the first user to create and store multiple "Notes" on GoodDay's server:
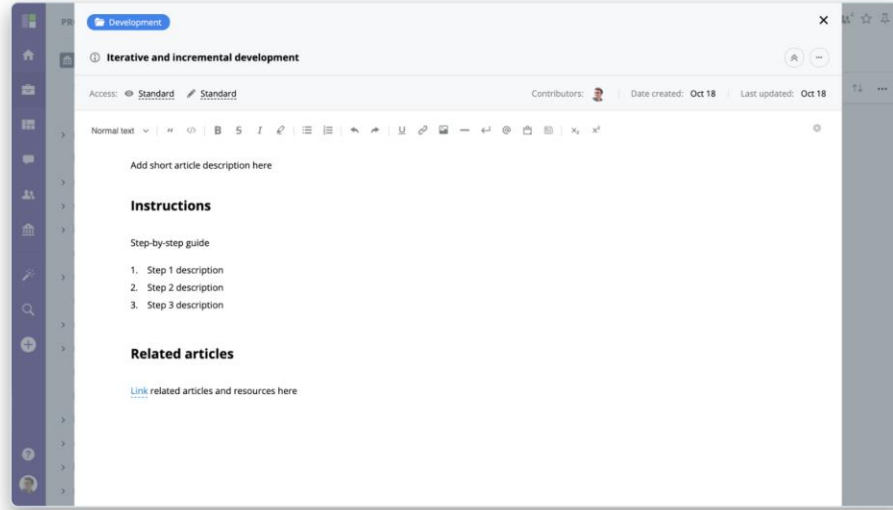
See, e.g., https://www.goodday.work/help/notes/overview (last visited, Dec. 20, 2022).

52.   The '644 Accused Instrumentalities allows for the first user to create and store multiple "Documents" on GoodDay's server:

Overview

Documents in GoodDay are very versatile and allow to create, store, and manage rich text documents, fully integrated with other work items. Create simple notes, how-to's, add meeting notes on the fly or create your own knowledge base - you can tackle any information sharing challenge with GoodDay documents.

See, e.g., https://www.goodday.work/views/docs (last visited, Dec. 20, 2022).

53.   The '644 Accused Instrumentalities allows for the first user to create and store multiple "Wikis" on GoodDay's server:

Wiki/Knowledge Management

Build your own knowledge base right in GoodDay, always available and shared with all team members. Wiki-style articles, how-to's, and notes are only a few ways you can record and consolidate your team's knowledge so you can leverage it as the foundation for future collaboration.

See, e.g., https://www.goodday.work/team-collaboration (last visited, Dec. 20, 2022).

54.   The "wiki" functionality is included in the "Notes" project module.

Version 4.1.0
JUNE 20, 2019

The new 'Notes' project module that allows to create, share, and manage text documents, create wiki/knowledge base systems, collaborate on articles and much more.

Major update of the Text Editor including support of new formatting options, customizable settings, markdown-style keyboard shortcuts and more.

User mentions in task messages and notes with custom notifications settings.

See, e.g., https://www.goodday.work/news (last visited, Dec. 20, 2022).

55.   The '644 Accused Instrumentalities associates a set of access restrictions with the document, including an ability to access the document by modification by one of a first group of users. For example, the GoodDay platform provides 2 types of user permissions: organization role and project access.

Overview

In GoodDay, there are 2 types of user permissions: organization role and project access.

Organization Role specifies permissions and access on the organizational level, i.e. it defines whether a user can create a folder/project in the root, edit the organization's settings, invite/manage users, access the management views and more.

Project Access determines user permissions and access within a particular folder/project, e.g. access to all tasks, permissions to add new project users, create subprojects, edit project settings, etc.

See, e.g., https://www.goodday.work/help/users/roles-access#admin (last visited, Dec. 20, 2022).

56.   The "Project Access" restrictions include the ability to access the document for modification by the first group of users—"Full Access" users.

Project Access

There are 3 levels of project access:

- **Full** - access to all data and management options, usually appropriate for the organization's manager or project managers.
- **Standard** - users with this level can see all work items (subfolders, tasks, events, etc.) but have no access to project settings and user management.
- **Limited** - users with this level can only see specific folders and tasks they have been added to. Usually you would grant this level of access to people outside of your organization, e.g. clients, contractors, etc.

Functionality	Full access	Standard	Limited
Add/Remove users	+	-	-
Manage user roles and access	+	-	-
Manage project/folder settings	+	-	-
Update project status	+	+	-
Create subprojects/folders	+	+	-
Manage subprojects/folders and their statuses	+	+	-
Access all tasks	+	+	*Limited
Manage (edit/move/change status) tasks	+	+	*Limited
Create events	+	*Limited	-
Manage events	+	*Limited	-

See, e.g., https://www.goodday.work/help/users-permissions (last visited, Dec. 20, 2022).

57.   The '644 Accused Instrumentalities allows a second user to request to modify the document, whether the document in question is a Project, Task, Note, or Document. For example, a "Standard" access user may request to update project status, or manage ("edit/move/change status") tasks. *See, e.g.*, https://www.goodday.work/help/users-permissions. A "Limited" access user has only limited access to tasks, but may still request (on a limited basis) to manage tasks. *See id.* In each case, the user must log into the GoodDay server using their identification information. *See, infra.*

58.   The GoodDay platform tracks the user permissions associated with each user's identification information. *See, e.g.*, https://www.goodday.work/help/multiple-organization-support (stating that a user may be an Administrator user for one organization and a Guest user in another organization, all under the same user account).

Multi-Organization Support

GoodDay architecture allows you to be a part of multiple organizations under the same account. You can be be an Administrator for one organization and a Guest user in another organization, and this intentional and well thought-out flexibility allows you to work with all your teams and work items without the need to switch accounts or "spaces".

See, e.g., https://www.goodday.work/help/multiple-organization-support (last visited, Dec. 20, 2022).

59.   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, e.g.*, https://www.goodday.work/security (last visited, Dec. 20, 2022). GoodDay issues a session cookie to record encrypted authentication information for the duration of a specific session. *See id.*
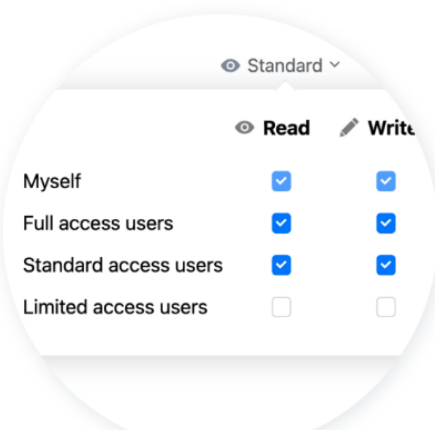
User security

Each user in your GoodDay environment has a unique user name (i.e., their email address). We offer forms-based authentication (username and password) and Google Authentication to all users of GoodDay. GoodDay issues a session cookie only to record encrypted authentication information for the duration of a specific session. The session cookie does not include either the user name or password of the user. GoodDay does not use cookies to store other confidential user and session information, but instead implements more advanced security methods based on dynamic data and encoded session IDs. All account login attempts are logged, and account lockout policies can be enabled to lock account access after a certain number of failed login attempts if requested.

Single Sign-On: For Enterprise accounts, GoodDay supports SAML 2.0 integration, which allows you to control access across your organization and define authentication policies for increased security.

See, e.g., https://www.goodday.work/security (last visited, Dec. 20, 2022).

60.   The '644 Accused Instrumentalities has highly customizable permissions whereby the platform permits the second user to modify the document based upon their individual access rights.
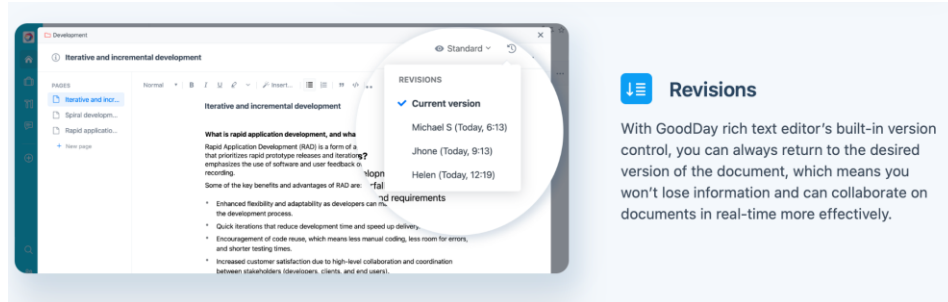
Access control

For complete flexibility around document security and privacy settings, you can manage user access rights on a per-document basis, independent of the project's user access rights.

See, e.g., https://www.goodday.work/views/docs (last visited, Dec. 20, 2022).

61.   The '644 Accused Instrumentalities permits receiving "approval or disapproval" for modifications. GoodDay's built-in version control enables receiving approval or disapproval for the modifications from one or more users.


See, e.g., https://www.goodday.work/views/docs (last visited, Dec. 20, 2022).

See, e.g., https://www.goodday.work/team-collaboration (last visited, Dec. 20, 2022).

62.   The '644 Accused Instrumentalities, stores the identifying information of one or more users who approved or disapproved of modifications to the document. GoodDay's built-in version control enables stores identifying information of users who edited or revised the document, including approving or disapproving of any such modifications.
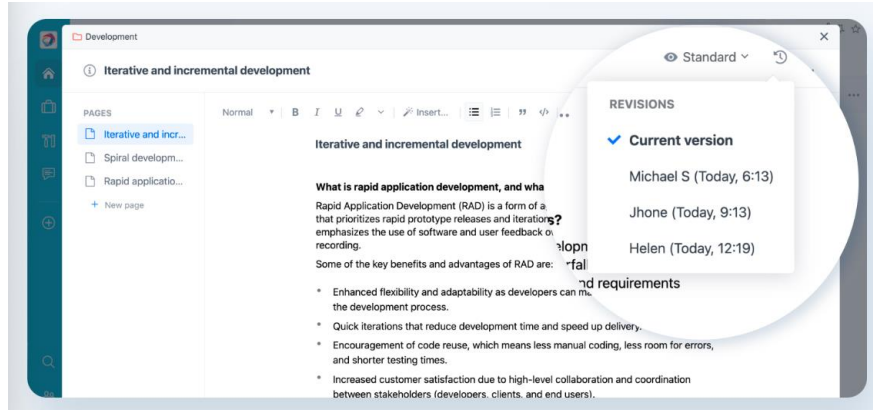
See, e.g., https://www.goodday.work/views/docs (last visited, Dec. 20, 2022).

63.   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.

64.   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.

65.   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.

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

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

68.   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.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment for itself and against Defendant as follows:

a.   A judgment that Defendant has infringed one or more claims of each of the Asserted Patents;

b.   A judgment awarding Plaintiff all damages adequate to compensate for Defendant's infringement, and in no event less than a reasonable royalty for Defendant's acts of infringement, including all pre-judgment and post-judgment interest at the maximum rate allowed by law;

c.   A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding Plaintiff its reasonable attorneys' fees.

d.   A judgment awarding Plaintiff such other relief as the Court may deem just and equitable.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury of this action.

Dated: January 13, 2023

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