

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PARKING WORLD WIDE LLC,)	
A Missouri Limited Liability Company,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	
CITY OF ST. LOUIS,)	JURY TRIAL DEMANDED
A Missouri Municipality,)	
)	
Defendant.)	

COMPLAINT

Plaintiff Parking World Wide LLC (“Plaintiff), by and through its undersigned counsel, pleads the following against the City of St. Louis (“Defendant”) and alleges as follows:

ALLEGATIONS COMMON TO ALL COUNTS

- (1) That Plaintiff is a single member Missouri Limited Liability Company with the member being a citizen of the State of Missouri.
- (2) That the City of St. Louis is a municipality in the State of Missouri and a citizen of the State of Missouri.
- (3) Venue is proper in this Court as the patented method in question was developed in this district and patented while in this district. 28 U.S.C. § 1338(a).
- (4) That on or about October 8, 2019, Mr. Gil Bashani was awarded Patent US 10,438,421 B2 (“Patent”); subsequently, the patent was assigned to Plaintiff, Parking World Wide, LLC, on or about November 7, 2019.

(5) The Patented method is a parking status system that overlays images of a street, a lot, or a garage with representations of parked vehicles, the status of any parking space shown in the image and uses those same representations for the enforcement of parking laws.

(6) The Patented method transforms parking space, payment, and subscriber data into parking space statuses shown in real time to a user.

(7) Claim 1 of the Patent includes, *inter alia*, assembling a database upon a computer of parking spaces including their geographic locations and updating a database upon a computer of subscribers.

(8) Claim 5 of the Patent includes, *inter alia*, assembling a database upon a computer of parking spaces including their geographic locations and updating a database upon a computer of subscribers.

COUNT I
DIRECT - INFRINGEMENT OF CLAIM 1 OF PATENT

(9) Plaintiff re-alleges and incorporates herein all previous paragraphs of its Complaint.

(10) The City of St. Louis infringed on Plaintiff's Patent by using demand responsive pricing and parking control software with a database of metered parking spaces that copies Plaintiff's patented method and as such is an infringement of claim 1 of Patent pursuant to 35 U.S.C. § 271(a). Such infringement, includes, but is not limited to:

(a) The City of St. Louis has an office referred to as the City Treasurer ("Treasurer"), responsible for the municipally owned parking facilities within the

territorial limits of the City of St. Louis. The Treasurer operates the ParkLouie website for motorists to reserve parking within the Treasurer's jurisdiction;

(b) the Treasurer utilizes a system that signifies a parking space number with a map of the parking space, utilizes a database of parking spaces, and utilizes a system that identifies "active sessions" by subscriber, amount paid expiration time period;

(c) the City of St. Louis webpage, particularly the Treasurer's parking page, has content. Treasurer's ParkLouie webpage, *see* Exhibit 1, states space # and has a map button, *see* Exhibit 2 ("Ex. 2"), which results from assembling a database of parking spaces;

(d) the Treasurer's ParkLouie webpage then states, "sign up" and "sign in," *see* Ex. 2, which suggests a database of subscribers;

(e) the Treasurer's ParkLouie webpage has "active sessions" listing data by subscriber, amount paid, and expiration, *see* Ex. 2, which suggests updating a subscriber database;

(f) the Treasurer's ParkLouie webpage continues with space # and list of most recent zone, *see* Ex. 2, which suggests calculating a location of a parking user;

(g) the Treasurer's ParkLouie webpage has "reserving your spot ahead," *see* Ex. 1, and "find my car button," *see* Ex. 2, which together determine a parking spot to within eight (8) to ten (10) feet;

(h) the Treasurer's ParkLouie webpage "active sessions" has expiration time, *see* Ex. 2, which suggests comparing spaces, parking users or subscribers, and expired spaces to find parking users who have not paid;

(i) the Treasurer has “Paying a Ticket” webpage, *see* Ex. 3, that suggests the existence of a list of unpaid spaces sent to enforcement with indicia; and

(j) the Treasurer has “Paying a Ticket” webpage, *see* Ex. 3, that suggests enforcing officer has list of spaces and image of them upon an electronic device.

(11) The actions of the Defendant City of St. Louis have caused and is causing Plaintiff to suffer monetary damages.

(12) Further actions by Defendant will cause continued harm to Plaintiff and as such must be ordered by this Court to immediately stop infringing on Plaintiff’s Patent.

COUNT II
DIRECT - INFRINGEMENT OF CLAIM 5 OF PATENT

(13) Plaintiff re-alleges and incorporates herein all previous paragraphs of its Complaint.

(14) The City of St. Louis infringes on Plaintiff’s Patent by using demand responsive pricing and parking control software with a database of metered parking spaces that copies Plaintiff’s patented method and as such is an infringement of claim 5 of Patent pursuant to 35 U.S.C. § 271(a). Such infringement, includes, but is not limited to:

(a) Treasurer’s ParkLouie webpage, *see* Ex. 1, states space # and has a map button, *see* Ex. 2, which results from assembling a database of parking spaces;

(b) The Treasurer’s ParkLouie webpage then states, “sign up” and “sign in,” *see* Ex. 2, which suggests a database of subscribers;

(c) The Treasurer's ParkLouie webpage has "active sessions" listing data by subscriber, amount paid, and expiration, see Ex. 2, which suggests updating a subscriber database;

(d) The Treasurer's ParkLouie webpage continues with space # and list of most recent zone, see Ex. 2, which suggests calculating a location of a parking user;

(e) The Treasurer's ParkLouie webpage has "reserving your spot ahead," see Ex. 1, and "find my car button," see Ex. 2, which determines a parking spot to within eight (8) to ten (10) feet;

(f) The Treasurer's ParkLouie webpage "active sessions" has expiration time, see Ex. 2, which suggests comparing spaces, parking users or subscribers, and expired spaces to find parking users who have not paid;

(g) The Treasurer has a Paying a Ticket webpage, see Ex. 3, that suggests a list of unpaid spaces is sent to enforcement with indicia; and

(h) Upon detecting a parking user who has not paid, see Ex. 3, and stating "parking tickets issued by the City of St. Louis," *id.*, the Treasurer's "Paying a Ticket" webpage suggests a message is sent to enforcement with a list and indicia displayed on an electronic device.

(15) The actions of said Defendant City of St. Louis have caused and is causing Plaintiff to suffer monetary damages.

(16) Further actions by Defendant will cause continued harm to Plaintiff and as such must be ordered to immediately stop infringing on Plaintiff's patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for a judgment against the Defendant City of St. Louis as follows:

(a) That the City of St. Louis has infringed upon Plaintiff's Patent, and unless enjoined will continue to infringe upon Plaintiff's Patent;

(b) that the City of St. Louis willfully infringed on Plaintiff's Patent;

(c) that Defendant City of St. Louis pay Plaintiff damages adequate to compensate Plaintiff for Defendant's infringement of each of Plaintiff's claims pursuant to 35 U.S.C. § 284;

(d) that Defendant be ordered to pay prejudgment and post-judgment interest on the damages assessed;

(e) that Defendant be enjoined from infringing on Plaintiff's patent, or if infringement is not enjoined, that Defendant be ordered to pay ongoing royalties to Plaintiff for any post-judgment infringement;

(f) that Plaintiff be awarded attorneys' fee and costs of this action; and

(g) that Plaintiff be awarded such other relief as the court deems necessary and proper.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demands a trial by jury on issues triable by a jury.

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