

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

KIOBA PROCESSING LLC,

Plaintiff,

v.

CITIBANK, N.A.,

Defendant.

Case No. 6:23-CV-00787

Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Kioba Processing LLC (“Kioba”) files this Complaint against Citibank, N.A. (hereinafter “Citibank”) for infringement of United States Patent Nos. 6,332,134, 6,862,610, 6,917,902, 6,931,382, 7,107,078, 8,442,915, and 9,471,888 (the “Patents-in-Suit”), and alleges 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. Kioba Processing LLC is a Georgia limited liability company with its principal place of business at 44 Milton Ave., Suite 254, Alpharetta, GA, 30009, USA.

3. On information and belief, defendant Citibank is organized as a national banking association under the National Banking Act and has a regular and established place of business at 100 Citibank Drive, San Antonio, Texas 78245.

4. On information and belief, defendant Citibank is an indirect wholly owned subsidiary of Citigroup Inc. (“Citigroup”) and serves as Citigroup’s primary U.S. banking subsidiary. Citibank is the third largest bank in the United States in terms of assets, with some 700+ branches throughout the United States.

5. On information and belief, Defendant Citibank may be served with process at its registered address of P.O. Box 3226, S&U Tax Department, Tampa, FL 33601-3226 and via its registered agent The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

6. Citibank does business within the State of Texas and has regular and established places of business within this District.

JURISDICTION AND VENUE

7. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Upon information and belief, Defendant is subject to personal jurisdiction of this Court based upon it having regularly conducted business, including the acts complained of herein, within the State of Texas and this judicial district and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this District.

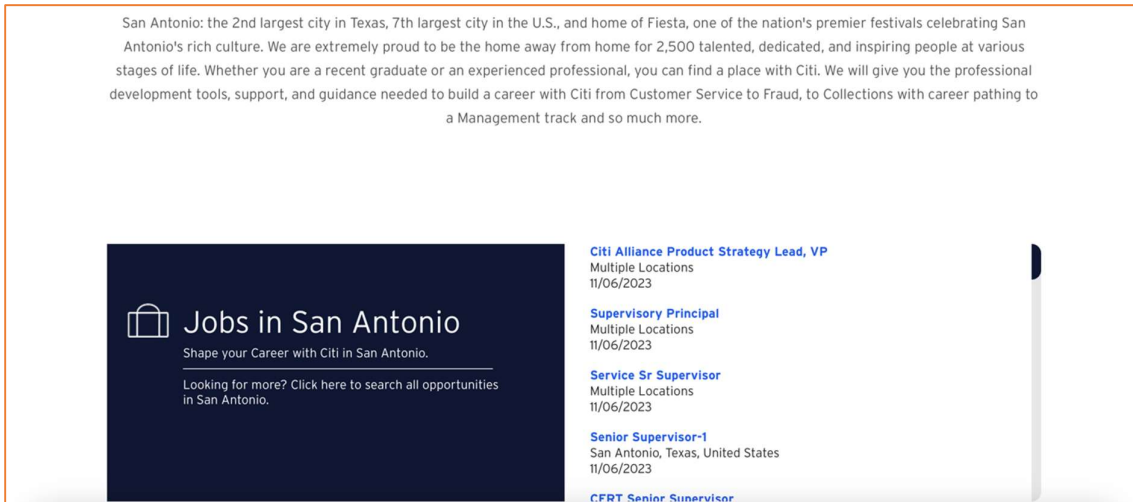
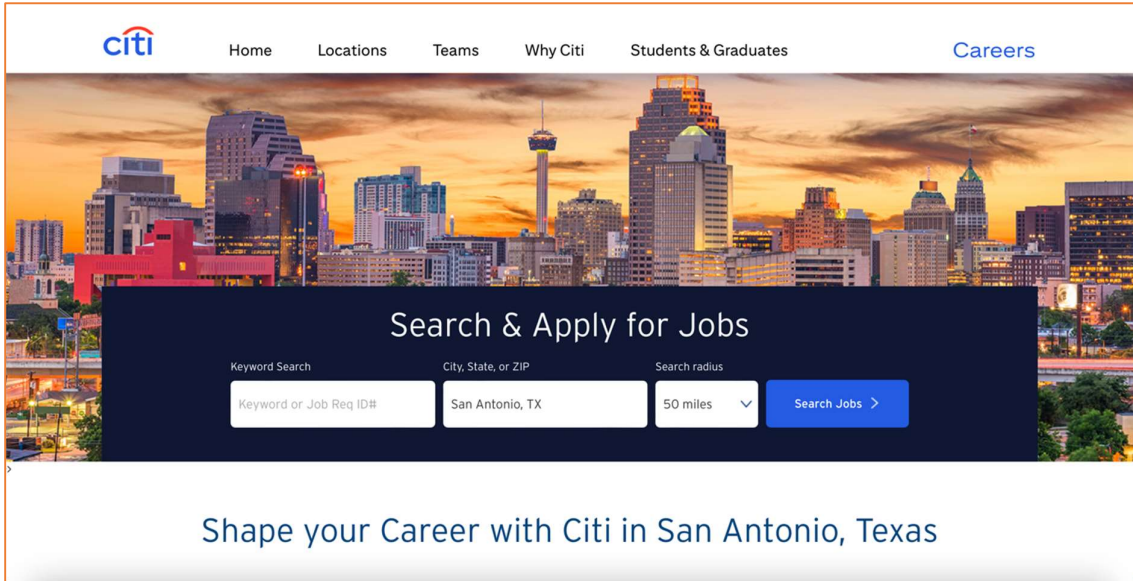
9. Citibank has been authorized to do business in Texas under Texas Taxpayer Number 11352664707 since at least October 1, 2006.


10. On information and belief, Citibank maintains an Operations Center located at 100 Citibank Drive, San Antonio, Texas 78245 employing “2,500 talented,

dedicated, and inspiring people at various stages of life.” See

<https://jobs.citi.com/sanantonio>.

11. In addition to the 2500 employees already in San Antonio, Texas, Citibank currently advertises 42 open positions for employment there.






An Inclusive Office Culture

Our commitment to diversity is core to Citi's values. More than 50 percent of our colleagues globally are women, 45 percent of our U.S. workforce are minorities, and our inclusive culture has been recognized and rewarded by LGBT+ communities all over the world. We have a multicultural workforce reflective of this great city's demographic makeup. 46 percent of our San Antonio team is participating in one of the location's five Employee Network Chapters, which serve as local branches of our affinities.

These Chapters are employee-initiated and employee-led groups, and each Network Chapter is open to all employees. Not all groups are represented at every location. Visit our [Global Diversity and Inclusion](#) page to learn more.




Community Involvement

The compassionate attitudes of the Citi team motivate them to improve the San Antonio community through as many as 20 organizations, including United Way and the American Red Cross Disaster Relief. In 2017, Citi employees dedicated 10,250 volunteer hours. On top of time donated, Citi San Antonio gives nearly \$300,000 to local charitable organizations.

[Search Jobs in San Antonio >](#)

<https://jobs.citi.com/sanantonio>.



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Senior Supervisor-1

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Compliance Business Control Specialist (C05/Hybrid)

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Supervisory Principal

Multiple Locations >

<https://jobs.citi.com/search-jobs/San%20Antonio%2C%20TX/287/4/6252001-4736286-4674023-4726206/29x42412/-98x49363/50/2>.

Fraud Analytics Technology & Implementation Lead - C13

Job Req ID: 23703088 **Location(s):** Irving, Texas; San Antonio, Texas; Wilmington, Delaware; Jacksonville, Florida; Sioux Falls, South Dakota
Job Type: Hybrid **Job Category:** Decision Management

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As part of the Fraud Analytics, Modeling & Intelligence organization, this role manages and executes the fraud analytics and strategies supporting Cit's North American and global credit card and retail bank businesses. This includes leveraging data to identify fraud trends then designing and implementing strategies to prevent and mitigate fraud attacks across the full fraud lifecycle including application and synthetic ID fraud, account takeover, and sophisticated new attack schemes. This role partners closely with Fraud Policy, Operations and various partners to keep apprised of business and technology direction to determine potential and existing fraud impacts.

Responsibilities:

- Assist in the management of business requirements, testing, and implementation of projects impacting fraud decision systems as well as system incidents.
- Support implementation of fraud risk strategies for retail bank, small business, and commercial bank credit within decision engine systems in accordance with defined change control procedures and controls.
- Refine framework for change control risk assessment including evaluation of control gaps within existing processes.
- Support Governance processes, evaluating historical performance and emerging changes in the environment.
- Build effective relationships within and outside the Fraud organization to help ensure successful and timely execution of key portfolio priorities.
- Identify data patterns & trends, and provide insights to enhance business decision making capability in business planning, process improvement, solution assessment etc.
- Translate data into consumer or customer behavioral insights to drive targeting and segmentation strategies, and communicate clearly and effectively to business partners and senior leaders all findings
- Collaborate with cross-functional teams to provide strategy recommendations based on data and trend analysis and implement mitigation strategies.
- Continuously improve processes and strategies by exploring and evaluating new data sources, tools, and capabilities
- Work closely with internal and external business partners in building, implementing, tracking, and improving fraud capture decision strategies.
- May be involved in exploratory data analysis, confirmatory data analysis and/or qualitative analysis
- Appropriately assess risk when business decisions are made, demonstrating consideration for the firm's reputation and safeguarding Citigroup, its clients, and assets, by driving compliance with applicable laws, rules, and regulations, adhering to Policy, applying sound ethical judgment regarding personal behavior, conduct and business practices, and escalating, managing, and reporting control issues with transparency.
- Generate and manage regular and ad-hoc reporting to enable effective monitoring and identification of emerging trends.

<https://jobs.citi.com/job/irving/fraud-analytics-technology-and-implementation-lead-c13/287/55957920272>.

CGW CAO Risk & Control NAM Citigold/CPC Issue Management AVP

Job Req ID: 23690538 **Location(s):** Fort Lauderdale, Florida; San Antonio, Texas; Jacksonville, Florida; Jersey City, New Jersey
Job Type: On-Site/Resident **Job Category:** Risk Management

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Citi Global Wealth (CGW) is an integration of Citi Private Bank and the Consumer Wealth organization into a single platform enabling Citi to serve its clients across the wealth spectrum and capitalize on Citi's industry leading capabilities to support the goal of CGW, which is to be the leading wealth management provider globally. As we embark on this journey, it is imperative to have a strong Risk & Control framework, supporting this goal through an independent but integral Internal Control organization.

This role is responsible for the end-to-end management of issues for within CGW, including project managing, monitoring, tracking and actionable reporting of issues.

This role will ultimately report to the Head of CGW Business Risk & Controls.

Responsibilities:

- Drive proactive and timely identification, management, and oversight of issues across Citi Global Wealth in line with firm requirements. This will include identifying thematic root causes underlying issues and facilitating the effective remediation of control gaps.
- Responsible for the end-to-end management of issues from initiation, remediation and validation for assigned issues relating to CGW product, region or client segment.
- Partner with Issue Owners to strengthen issue remediation including ensuring all issues are clearly articulated, appropriately documented with root causes identified and corresponding corrective action plans.
- Partner with Risk and Control leads, Issue Owners, and Business Management to track timely completion of remediation including identify any issues at risk and defining appropriate path to remediation.
- Perform pre-validation testing of assigned issues, including appropriately assessing completion of the actions including design and operating effectiveness assessment of controls prior for submission to validation
- Liaise within the organization to ensure connectivity with enterprise-wide issue management efforts to enhance Citi's safety and soundness.
- Development of strong relationships with key stakeholders.
- Proactive engagement with control functions to ensure understanding of the CGW governance program.
- Focus on continuous control improvements across all areas to ensure continued improvement of the control framework in an efficient, cost effective, streamlined, and value-add manner.

<https://jobs.citi.com/job/fort-lauderdale/cgw-cao-risk-and-control-nam-citigold-cpc-issue-management-avp/287/54067137104>.

Fraud Operations Senior Analyst (AVP/Hybrid)

Job Req ID: 23704975 **Location(s):** Jacksonville, Florida; San Antonio, Texas **Job Type:** Hybrid **Job Category:** Operations - Services

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The Fraud Ops Sr Analyst is a senior level positions responsible for contributing to the development of fraud management policies, processes and procedures to minimize the impact of fraud in coordination with the Operations - Services team. The overall objective of this role is to manage fraud losses by ensuring analysts make appropriate decisions using risk/reward balance methodology.

Responsibilities:

- Work with our Control and Monitoring Partners to identify key risks to create necessary activities and controls.
- Partner with key stakeholders in Legal, ICRM, Policy, Analytics and Operations to strategize, plan and obtain necessary approvals for process and procedure implementation.
- Work to document and prioritize requirements that are critical to the area or function.
- Solve complex fraud prevention and loss control issues with significant cross-departmental and departmental impact
- Recommend and implement new work procedures and address and resolve exceptional/unusual issues
- Partner with the operation team(s) and other departments within fraud prevention and loss control
- Contribute to the development of new techniques and processes for the area or function
- Serve as an expert in fraud prevention and loss control, overseeing a segment of the workforce
- Evaluate moderately complex and varied issues with substantial potential impact
- Assume informal/formal leadership role within teams - coach, uptrain on processes
- Appropriately assess risk when business decisions are made, demonstrating particular consideration for the firm's reputation and safeguarding Citigroup, its clients and assets, by driving compliance with applicable laws, rules and regulations, adhering to Policy, applying sound ethical judgment regarding personal behavior, conduct and business practices, and escalating, managing and reporting control issues with transparency.
- Assist Fraud Analytics and Policy in analyzing fraud losses to identify risks and implement changes in Operations to mitigate losses.
- Serve as coordinator of iCAPS for Operations and lead efforts and tasks to close milestones.
- Support Wealth initiatives for Retail Bank

Qualifications:

- 5-8 years of experience in a related role
- Intermediate to senior level experience in a similar position preferred
- Proven experience in the Investigation and Fraud process
- Experience in Project Management or related field
- Experience in driving and executing on Business improvement initiatives
- Experience in trend analysis and alerts in early fraud detection
- Ability to work in a high-paced environment
- Proficient in Microsoft Office
- Consistently demonstrates clear and concise written and verbal communication

https://jobs.citi.com/job/jacksonville/fraud-operations-senior-analyst-avp-hybrid/287/56353833808.

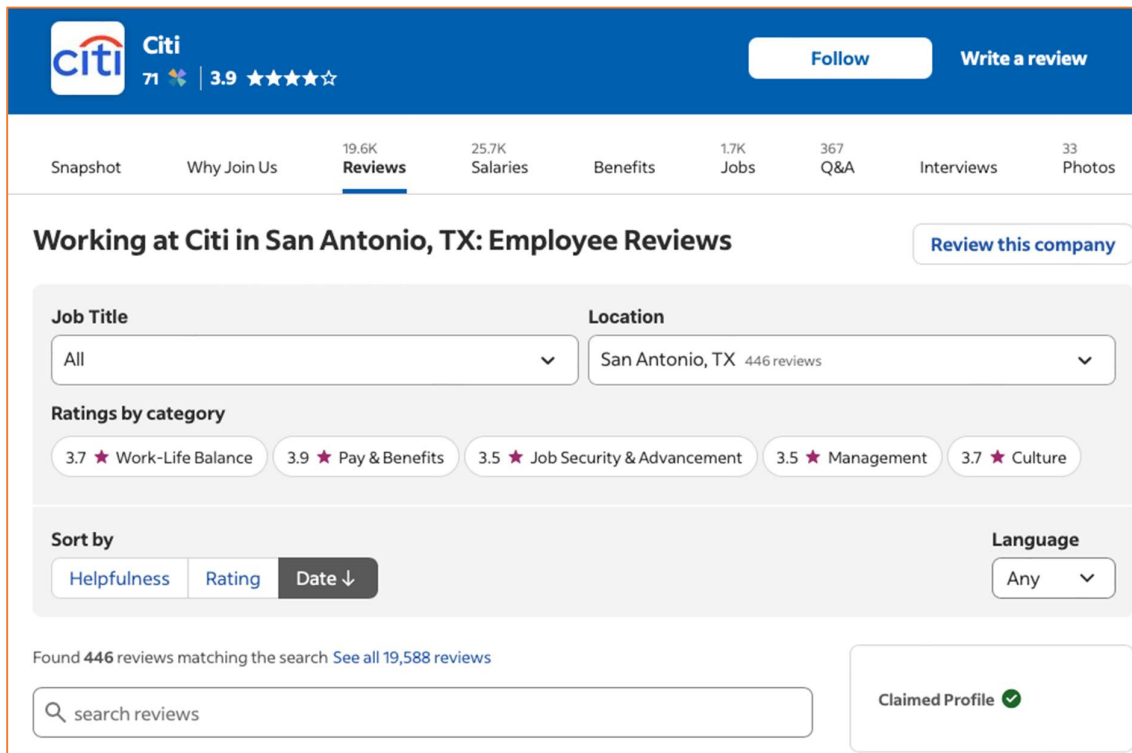
12. On November 2023 search on www.linkedin.com revealed 1100 people as presently working for Citibank in the San Antonio, Texas area.

The screenshot shows a LinkedIn search interface with the following elements:

- Search bar: "citi"
- Navigation: Home, My Network (4), Jobs, Messaging (3), Notification (23)
- Filters: People, San Antonio, TX (1), Citi (1), Connections, All filters, Reset
- Results: About 1,100 results
- Profile 1: Stephanie Esquivel Flores, MBA - 2nd. Assistant Vice President, Resource Officer at Citi Personal Wealth Management, San Antonio, TX. Current: Assistant Vice President, Resource Officer at Citi. Vicente Trelles is a mutual connection. Action: Connect.
- Profile 2: David Glad - 3rd+. Vice President at Citi, San Antonio, TX. Current: Supervisory Principal, VP at Citigroup Global Capital Markets Inc. - Copy-pasted from their job description: The Business Risk Officer role in Citi Global Wealth is a... Action: Message.
- Profile 3: David Harris - 3rd+. Supervisory Principal at Citi, San Antonio, TX. Current: Citi Advisor at Citi. 133 followers. Action: Follow.
- Profile 4: Lisa Nemetz - 3rd+. Senior Manager, San Antonio, TX. Current: Operations Manager at Citi. Action: Message.
- Profile 5: Josalyn Madrigal - 3rd+. Supervisory Principal at Citi, San Antonio, TX. Current: Supervisory Principal - Field supervision at Citi. Action: Message.
- Profile 6: Polly Wagner - 3rd+. SVP Legal Operations at Citi. Action: Message.

https://www.linkedin.com/search/results/people/?currentCompany=%5B%2211448%22%5D&geoUrn=%5B%22102396835%22%5D&heroEntityKey=urn%3Ali%3Aorganization%3A11448&keywords=citi&origin=FACETED_SEARCH&position=3&searchId=af5854ca-dd8f-46d3-884b-f99ad0ed8610&sid=F-W.

13. On November 2023 search on www.indeed.com revealed 446 employee reviews for Citibank by employees describing employment in San Antonio, Texas, including current employees working in the San Antonio, Texas area.



<https://www.indeed.com/cmp/Citi/reviews?fcountry=US&floc=San+Antonio%2C+TX>.

14. On information and belief, Citibank contracts with and issues debit and credit cards to its customers, including but not limited to those customers in this Judicial District, to provide card services. See, <https://www.citi.com>. On information and belief, Citibank also provides mobile and online banking services

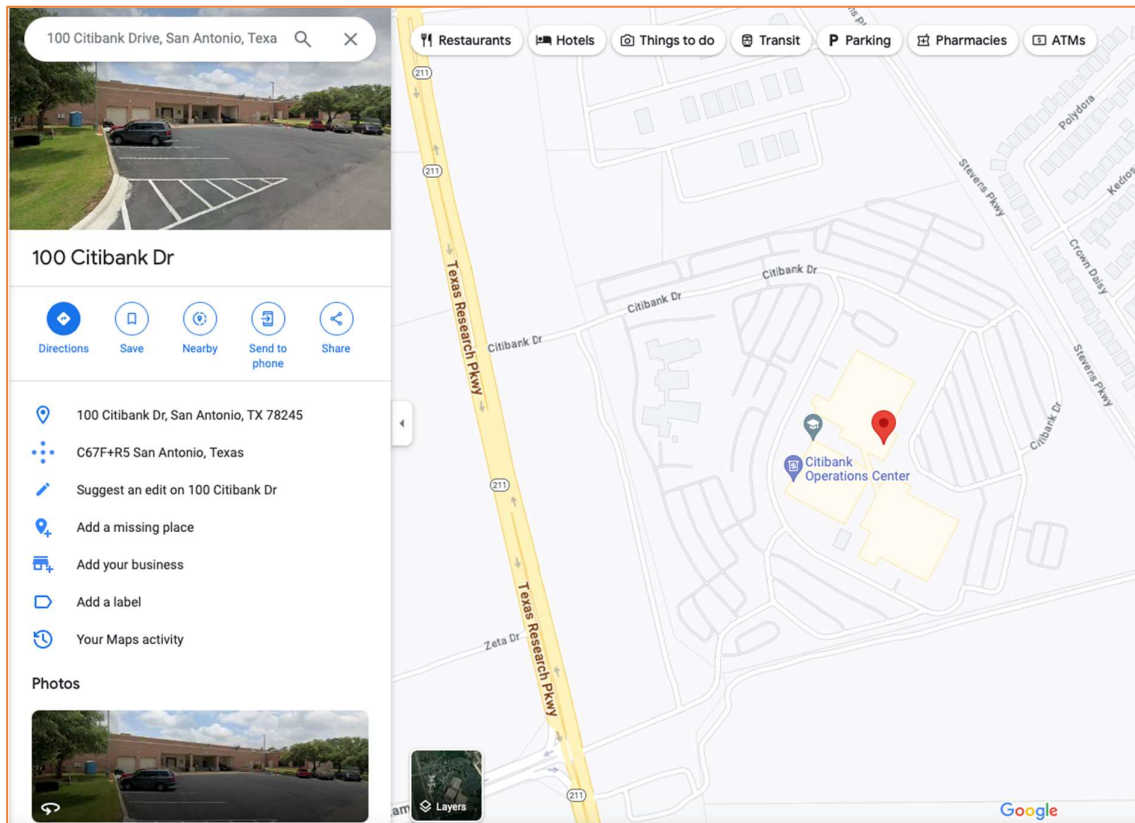
associated with its banking products, such as debit card, checking, and savings accounts.

15. The Patents-in-Suit cover Citibank's products, services, and methods related to the offering, issuing, providing, registering, facilitating, maintaining, transacting, authenticating, and processing commercial transactions via banking products, including trading, checking, savings, and debit card accounts, which are designed, developed, manufactured, distributed, sold, offered for sale, and used by Citibank and/or its customers, consumers, and clients, including but not limited to those customers, consumers, and clients residing in the State of Texas and this Judicial District.

16. On information and belief, Citibank, on its own and/or via its divisions, subsidiaries, partners, and affiliates maintain a corporate and commercial presence in the United States, including in the State of Texas and this judicial district, via at least 1) Citibank's physical branch locations, mortgage centers, and ATM locations established throughout Texas, including this District; 2) Citibank's online presence (*e.g.*, <https://www.Citi>) that provides to consumers access to Defendants' banking products and services, including those identified as infringing herein; and 3) consumers and clients of Defendants who utilize Citibank debit card account services, at the point of sale in numerous merchant physical and online sites, *i.e.*, retail stores, restaurants, and other service providers accepting Citibank debit and credit cards. Citibank, on its own and/or via alter egos, agents, divisions, subsidiaries, partners, and affiliates maintain branch locations and ATMs

throughout this District. Thus, Citibank does business, including committing infringing acts, in the U.S., the State of Texas, and in this Judicial District.

17. On information and belief, Citibank maintains a regular and established place of business in this judicial district at 100 Citibank Drive, San Antonio, Texas 78245:



<https://www.google.com/maps/place/100+Citibank+Dr,+San+Antonio,+TX+78245/@29.4147889,-98.7779361,17z/data=!4m15!1m8!3m7!1s0x865c413119eab843:0x711b468ba969087b!2s100+Citibank+Dr,+San+Antonio,+TX+78245!3b1!8m2!3d29.4145969!4d-98.7770264!16s%2Fg%2F11csm98cqr!3m5!1s0x865c413119eab843:0x711b468ba969087b!8m2!3d29.4145969!4d-98.7770264!16s%2Fg%2F11csm98cqr?entry=ttu>

18. On information and belief, Citibank has made, used, offered to sell and/or sold products and services, including the following specifically accused products and services: (1) Citibank ATM/Debit Cards and Credit Cards; (2) products and services associated with Citibank ATM/Debit Cards and Credit Cards; (3) Products and Services implementing Debit and Credit Card “Quick Lock” service; (4) Citibank Face ID/Touch ID Service; (5) Citibank two-step verification services; (6) Citibank multi-factor Authentication services; (8) website services accessible through <https://www.Citi.com/>; (9) Citibank automated phone services; (10) website products and services hosted on the Citi.com domain; (11) current or legacy products or services, which use, or have used, one or more of the foregoing products and services as a component product or component service; (12) combinations of products and/or services comprising, in whole or in part, two or more of the foregoing products and services; and (13) all other current or legacy products and services imported, made, used, sold, or offered for sale by Citibank that operate, or have operated in a substantially similar manner as the above-listed products and services. (As used herein, one or more of the foregoing products and services are individually and collectively referred to as the accused “Citibank Products and Services”). On information and belief, the Citibank Products and Services infringe at least one claim of each of the patents-in-suit.

19. On information and belief, Citibank, as well as the hardware and software components comprising the Citibank Products and Services and/or that enable the Citibank Products and Services to operate, including but not limited to servers, server hardware, server software, website software, web servers, client-side

software, mobile software, mobile app software, and browser executable software (individually and collectively referred to herein as the accused “Citibank System”), directly infringe and/or induces others to infringe, either literally and/or under the doctrine of equivalents, sed at least one claim of each of the patents-in-suit.

20. This Court has personal jurisdiction over Citibank, at least, because it committed and continues to commit acts of infringement in this judicial district in violation of 35 U.S.C. §§ 271(a) and (b). In particular, on information and belief, Citibank (i) has made, used, offered to sell access to, and/or sold access to the accused Citibank Products and Services in the Western District of Texas; (ii) has made, used, offered to sell access to, and/or sold access to the Citibank System in the Western District of Texas; and (iii) has induced its customers, including those located in the Western District of System, to use the Citibank Products and Services and the Citibank System and continues to do so.

21. On information and belief, Citibank is subject to the Court’s jurisdiction because it regularly conducts and solicits business, or otherwise engages in other persistent courses of conduct in this judicial district, and/or derives substantial revenue from the use, sale, and distribution of goods and services, including but not limited to the accused Citibank Products and Services provided to individuals and businesses in the Western District of Texas.

22. On information and belief, Citibank directly infringes the patents-in-suit in Texas, including specifically the Western District of Texas, at least, by making, using, offering to sell access to, and/or selling access to the accused Citibank Products and Services in the Western District of Texas, and its making, use, offering

to sell access to, and/or selling access to the Citibank System in the Western District of Texas.

23. On information and belief, one or more of the accused Citibank Products and Services and/or the Citibank System are made, used, sold and offered for sale by Citibank, its subsidiaries and/or agents, in the Western District of Texas.

24. On information and belief, Citibank's customers located in the Western District of Texas have obtained access to and used the accused Citibank Products and Services and/or the Citibank System while located in the Western District of Texas.

25. The Court has personal jurisdiction over Citibank, at least, because it has continuous business contacts in the State of Texas and in the Western District of Texas and Citibank has engaged in business activities including transacting business in the Western District of Texas and purposefully directing its business activities, including the sale or offer for sale of the Citibank Products and Services to the Western District of Texas to induce, aid, abet, and/or contribute to the infringement of third parties in the Western District of Texas, including without limitation the direct infringement of Citibank's customers located in the Western District of Texas through the use of Citibank Products and Services and the Citibank System, while they are located within the Western District of Texas.

26. This Court has personal jurisdiction over Citibank because, *inter alia*, Citibank, on information and belief: (1) has committed acts of patent infringement in this Western District of Texas; (2) maintains a regular and established place of business in the Western District of Texas; (3) has substantial, continuous, and

systematic contacts with this State and the Western District of Texas; (4) owns, manages, and operates facilities in this State and the Western District of Texas; (5) enjoys substantial income from its operations and sales in this State and the Western District of Texas; (6) employs Texas residents in this State and the Western District of Texas, and (7) solicits business using the Citibank Products and Services and the Citibank System in this State and the Western District of Texas.

27. On information and belief, Citibank supports and markets the Citibank Products and Services and the Citibank System in the State of Texas and this Judicial District, to customers and potential customers, who reside in the State of Texas and in this judicial district through various means, including through the efforts of its agents and/or employees who reside in the Western District of Texas.

28. Venue is proper pursuant to 28 U.S.C. §§ 1391(b), (c), (d) and/or 1400(b), at least because Citibank has committed acts of infringement in this judicial district and has regular and established places of business in this judicial district.

29. On information and belief, Citibank has litigated/is litigating cases before this Court in which it either admitted that personal jurisdiction and venue were proper, did not contest personal jurisdiction and venue, and filed counterclaims, thereby submitting to the jurisdiction of the Court.

Citibank's Prior Knowledge of the Patents-in-Suit

30. On or about May 15, 2020, outside counsel for Kioba sent a letter (the "May 2020 Notice Letter") via Certified Mail to Rohan Weerasinghe in his role as General Counsel of Citigroup. *See* Exhibit A. The May 2020 Notice Letter was sent to Citibank for the express purpose of acquainting Citibank with Kioba's patent

portfolio, including but not limited to the '902 and '382 patents, "illustrating the relevance of Kioba's patent portfolio to Citibank and its customers." *Id.* The May 2020 Notice letter provided claim charts and detailed evidence of the relevance of Kioba's patents to Citibank and invited Citibank to participate in discussions regarding a non-exclusive license to allow its continued use of Kioba's patented technologies.

31. On or about August 14, 2020, outside licensing counsel sent a follow-up letter (the "August 2020 Notice Letter"), via Federal Express, to Mr. Weerasinghe. *See* Exhibit B. The August 2020 Notice 2020 Letter provided claim charts and detailed evidence of the relevance of four Kioba patents to Citibank was sent to Citibank for the express purpose of acquainting Citibank with Kioba's patent portfolio, including but not limited to the '902, '382, '078, and '134 patents, "illustrating the relevance of Kioba's patent portfolio to Citibank and its customers" and "supplement[ing] the charts sent in [the] May" 2020 Notice Letter. *Id.* The August 2020 Notice letter once again invited Citibank to participate in discussions regarding a non-exclusive license to allow its continued use of Kioba's patented technologies.

32. On or about October 6, 2020, IPinvestments Group ("IPI"), in its role as the exclusive license agent for Kioba, sent an email to Mr. Weerasinghe following up on and attaching the May and August 2020 Notice Letters and claim charts. IPI also invited Citibank to engage in licensing discussions related to an additional portfolio of some 6,500 additional patents owned by Hanger Solutions.

33. On or about January 22, 2021, IPI again reached out to Mr. Weerasinghe by email following up on its previous email and the two unanswered

Notice Letters. IPI pointed out that Kioba had, at that time, granted non-exclusive license rights to numerous financial services companies as has also filed several patent infringement suits.

34. On or about September 1, 2022, IPI wrote to Brent McIntosh in his newly-appointed role as Chief Legal Officer & Corporate Secretary of Citigroup. In its September 2022 email, IPI referred Mr. McIntosh to the two unanswered Notice Letters and its previous email to Mr. Weerasinghe and advised him that Kioba had by that time granted additional non-exclusive licenses and litigated additional lawsuits.

35. As of the date of the filing of this Complaint, neither Citibank, Mr. Weerasinghe, Mr. McIntosh, nor anyone else has responded to any of Kioba's multiple attempts to enter into license discussions with Citibank.

36. On information and belief, at least as early as May 15, 2020, Citibank's infringement of the Patents-in-Suit has been willful, knowing, and intentional.

United States Patent No. 6,332,134

37. On December 18, 2001, the USPTO duly and legally issued United States Patent No. 6,332,134 ("the '134 patent") entitled "Financial transaction system" to inventor Chuck Foster.

38. The '134 patent is presumed valid under 35 U.S.C. § 282.

39. Kioba owns all rights, title, and interest in the '134 patent.

40. Kioba has not granted Citibank an approval, an authorization, or a license to the rights under the '134 patent.

41. The '134 patent relates to, among other things, new and novel methods of protecting user information during a purchase from a merchant, and more particularly, the inventions relate to using novel approaches to merchant transactions that ensure the security of sensitive information associated with a cardholder.

42. The specification of the '134 patent discloses shortcomings in the prior art and then explains, in detail, the technical way the inventions claimed by the '134 patent resolve or overcome those shortcomings. The '134 patent explains "Financial transactions conducted via computers and computer networks are susceptible to fraud or theft of confidential financial information. Computer software engineers continuously strive to improve the security of computer systems in an effort to prevent theft and thereby calm users' fears. Various encryption schemes have been used to provide a layer of security for confidential information, however, for every effort toward increased security, new techniques are developed by hackers to break into encrypted information. Specifically, hackers want to steal credit card numbers and associated personal information." '134 patent, 1:19-29.

43. The '134 patent details how providing information to a merchant "places the information at risk of being stolen." '134 patent, 1:54:55. Because credit card transactions provide the merchant with sensitive information there is an inherent risk that "the cardholder's credit card number and other personal information may be compromised." '134 patent, 1:55:67. The '134 patent recognized this shortcoming and provided a solution "that solves the problem of security for consumer credit card information transmitted over the Internet." '134 patent, 2:28-

29. One such solution allows the cardholder to make “purchases from the merchant using credit established at a financial institution.” ’134 patent, 3:14-15. This solution “eliminates multiple transmissions of personal credit card information across the network and the use of other vulnerable card number repositories having associated fees and staff.” ’134 patent, 2:53-56. The techniques for secure commercial transactions disclosed and claimed by the ’134 patent were not routine or conventional at the time of their invention.

United States Patent No. 6,862,610

44. On March 01, 2005, the USPTO duly and legally issued United States Patent No. 6,862,610 (“the ’610 patent”) entitled “Method and apparatus for verifying the identity of individuals” to inventor Gary Stephen Shuster.

45. The ’610 patent is presumed valid under 35 U.S.C. § 282.

46. Kioba owns all rights, title, and interest in the ’610 patent.

47. Kioba has not granted Citibank an approval, an authorization, or a license to the rights under the ’610 patent.

48. The ’610 patent relates to, among other things, verifying the identity of users connected to computer systems.

49. The claimed invention(s) of the ’610 patent sought to solve problems with, and improve upon, unauthorized access (and in general, to prevent other forms of fraud and theft), it is desirable to confirm the identity and/or age of the user requesting access to restricted material by checking an identifying code supplied by an unknown user against publicly available identity databases.

50. The '610 patent further explains that individuals may be particularly reluctant to share identifying information when the reputation of the requesting entity is not known to the user, and its trustworthiness is therefore in question. Currently, no system exists that enables users to verify certain facts about themselves, such as their age, without forfeiting their privacy and supplying confidential identity numbers to a potentially untrustworthy requestor. The '610 patent recognized this drawback and solved the problem by implementing an electronic business method and system which enables businesses to verify the identity of such clients at a minimal risk to the clients' privacy and without needing to possess confidential identity numbers belonging to the clients. The techniques for verifying the identity of users connected to a computer network disclosed and claimed by the '610 patent were not routine or conventional at the time of their invention.

United States Patent No. 6,917,902

51. On July 12, 2005, the USPTO duly and legally issued United States Patent No. 6,917,902 ("the '902 patent") entitled "System and Method for Processing Monitoring Data Using Data Profiles" to inventor Bruce Alexander.

52. The '902 patent is presumed valid under 35 U.S.C. § 282.

53. Kioba owns all rights, title, and interest in the '902 patent.

54. Kioba has not granted Citibank an approval, an authorization, or a license to the rights under the '902 patent.

55. The '902 patent relates to, among other things, biometric data processing systems.

56. The claimed invention(s) of the '902 patent sought to solve problems with, and improve upon, biometric data processing systems. For example, the '902 patent explains "[s]ome monitoring systems, such as security monitoring devices, have begun to incorporate biometric data monitoring devices, such as fingerprint scanners, retinal scanners, or facial recognition devices as part of a monitoring process. Although biometric monitoring devices can potentially facilitate the identification of individuals, objects and/or events, many traditional monitoring systems have not incorporated various biometric monitoring devices as part of an integrated monitoring process." '902 patent, 1:42-50.

57. The '902 patent further explains that "some incoming biometric data is incompatible with the typical reference sources and/or processing rules. Thus, the use of biometric identification devices as part of an overall monitoring process is still limited. In addition to the lack of ability to integrate biometric data processing as part of a monitoring process, many traditional monitoring systems do not provide or support robust data sources required by the traditional biometric identification devices. One skilled in the relevant art will appreciate that biometric identification tools require the use of data templates and data rules that are used to process biometric sample data coming in from the monitoring devices." *Id.* at 1:54-66.

58. At the time of the invention, "many closed monitoring systems [could not] efficiently support various biometric identification devices" or could not "utilize an external data template source if the data is maintained in an incompatible format." *Id.* at 2:3-9. The '902 patent recognized this drawback and solved the "need for a system and method for centrally processing and distributing biometric data

templates and data rules to one or more processing systems,” as well as the “need for a system and method for processing specific instances and types of biometric data.” *Id.* at 2:13-17. The techniques for monitoring and processing device data disclosed and claimed by the ’902 patent were not routine or conventional at the time of their invention.

United States Patent No. 6,931,382

59. On August 16, 2005, the United States Patent and Trademark Office (“USPTO”) duly and legally issued United States Patent No. 6,931,382 (“the ’382 patent”) entitled “Payment Instrument Authorization Technique” to inventors, Dominic P. Laage and Maria T. Laage.

60. The ’382 patent is presumed valid under 35 U.S.C. § 282.

61. Kioba owns all rights, title, and interest in the ’382 patent.

62. Kioba has not granted Citibank an approval, an authorization, or a license to the rights under the ’382 patent.

63. The ’382 patent relates to, among other things, a new and novel approach to protect against fraudulent credit and debit card activity.

64. The claimed invention(s) of the ’382 patent sought to solve problems with, and improve upon, credit and debit card systems. For example, the ’382 patent explains that online commerce creates numerous security risks associated with the storage of “sensitive financial data.” ’382 patent, 2:7-17. Online commerce presents numerous risks for both consumers and merchants. *Id.* Among other things, merchants face risks associated with fraudulent and unauthorized use. *See, e.g., id.* at 2:24-58. Similarly, consumers face risks associated with unauthorized access to their

financial data. *See, e.g., id.* at 2:59-63. The '382 patent recognized these problems and the need for "a system and method for providing assurance to the merchant that the person attempting to make a purchase with a payment instrument is in fact the authorized user of the instrument. There also exists a need for a system and method that allows a merchant to prove that the authorized cardholder actually made the transaction. There also exists a need for a system and method for reducing the likelihood of a cardholder's issuing bank authorizing a fraudulent online transaction." *Id.* at 2:64-3:5.

65. After identifying shortcomings in the prior art, the '382 patent provides technical solutions for preventing fraud and unauthorized transactions. More specifically, the patent discloses "technique[s] for strongly authenticating the owner of [a] payment instrument[]" and "a process by which owners of payment instruments [] have control over the usage of their payment instruments by giving them the ability selectively to block and unblock their payment instruments." *See, e.g., id.* at 3:8-21. The techniques for selectively blocking and unblocking payment instruments disclosed by the '382 patent were not routine or conventional at the time of their invention.

United States Patent No. 7,107,078

66. On September 12, 2006, the USPTO duly and legally issued United States Patent No. 7,107,078 ("the '078 patent") entitled "Method and System for the Effecting Payments by Means of a Mobile Station" to inventor Mariette Lehto.

67. The '078 patent is presumed valid under 35 U.S.C. § 282.

68. Kioba owns all rights, title, and interest in the '078 patent.

69. Kioba has not granted Citibank an approval, an authorization, or a license to the rights under the '078 patent.

70. The '078 patent relates to, among other things, authentication systems for transactions.

71. The invention(s) claimed in the '078 patent solves various technological problems inherent in prior-art transaction authentication systems. For example, the specification of the '078 patent discloses shortcomings in the prior art and then explains, in detail, the technical way the inventions claimed by the '078 patent resolve or overcome those shortcomings. The '078 patent recognized that the burgeoning mobile payment systems did not allow for a convenient “way to select the method of payment for a particular situation that has arisen based on current circumstances or the user’s wishes.” *See, e.g.,* '078 patent, 1:36-47. The '078 patent “makes it possible to offer the user a variety of user-selectable alternatives, suitable for the particular purchase, for making a payment.” *Id.* at 3:12-15. The '078 patent overcame this shortcoming by providing a secure interface for a user to select a preferred payment method. Additionally, the '078 patent recognized the benefits of using a network application to store user- specific information relating to payments, such as credit card numbers and encryption data. *Id.* at 3:21-25. Among other things, this solution provides the user with the ability to select a secure payment method, while avoiding the risks associated with storing payment information on a mobile terminal. The techniques for securely storing and presenting payment information disclosed by the '078 patent were not routine or conventional at the time of their invention.

United States Patent No. 8,442,915

72. On May 14, 2013, the USPTO duly and legally issued United States Patent No. 8,442,915 (“the ‘915 patent”) entitled “Modifiable Authentication Levels in Authentication Systems for Transactions” to inventors Sunao Takatori and Hisanori Kiyomatsu.

73. The ‘915 patent is presumed valid under 35 U.S.C. § 282.

74. Kioba owns all rights, title, and interest in the ‘915 patent.

75. Kioba has not granted Citibank an approval, an authorization, or a license to the rights under the ‘915 patent.

76. The ‘915 patent relates to, among other things, authentication systems for transactions.

77. The invention(s) claimed in the ‘915 patent solves various technological problems inherent in prior-art transaction authentication systems. *See, e.g.*, ‘915 patent, 1:25-55. For example, the patent recognized that commercial transactions over the Internet resulted in an increased amount of fraud. *Id.* As such, there was a need to verify users without causing inconvenience. *Id.* The inventors of the ‘915 patent recognized that a more secure, but convenient approach to authentication could be achieved by way of the user’s mobile communication device. *See, e.g., id.* at 2:57-3:53. The techniques for user authentication disclosed by the ‘915 patent were not routine or conventional at the time of their invention.

United States Patent No. 9,471,888

78. On October 18, 2016, the USPTO duly and legally issued United States Patent No. 9,471,888 (“the ‘888 patent”) entitled “Transmission of authorization information” to inventors Toni Komu, Petri Pohjanen, and Antti Kilpela.

79. The ‘888 patent is presumed valid under 35 U.S.C. § 282.

80. Kioba owns all rights, title, and interest in the ‘888 patent.

81. Kioba has not granted Citibank an approval, an authorization, or a license to the rights under the ‘888 patent.

82. The ‘888 patent relates to, among other things, utilizing a mobile station for the transmission of authorization information in a telecommunication network.

83. The claimed invention(s) of the ‘888 patent sought to solve problems with, and improve upon, the solution is to transmit the information into a mobile station by utilizing the short message function. Instead of visual verification, the verification can also be accomplished by utilizing *e.g.*, the infrared link of the mobile station.

84. The claimed invention(s) of the ‘888 patent sought to solve problems with, and improve upon, a verification procedure implemented using the short message function is that the user is required to perform certain actions to present the information to be verified in connection with the verification procedure and if only visual verification of the information is desired, it is not possible to add to a normal text message any property or check element of a visual nature.

85. The claimed invention(s) of the '888 patent sought to solve problems with and improve upon the method that the user has to transfer the ticket information by some means from the mobile station to an external device. The '888 patent recognized this drawback and solved the problem by implementing a method that will make it possible to use a mobile station for the transmission of authorization information requiring verification in a telecommunication network.

CLAIMS FOR RELIEF

Count I - Infringement of United States Patent No. 6,332,134

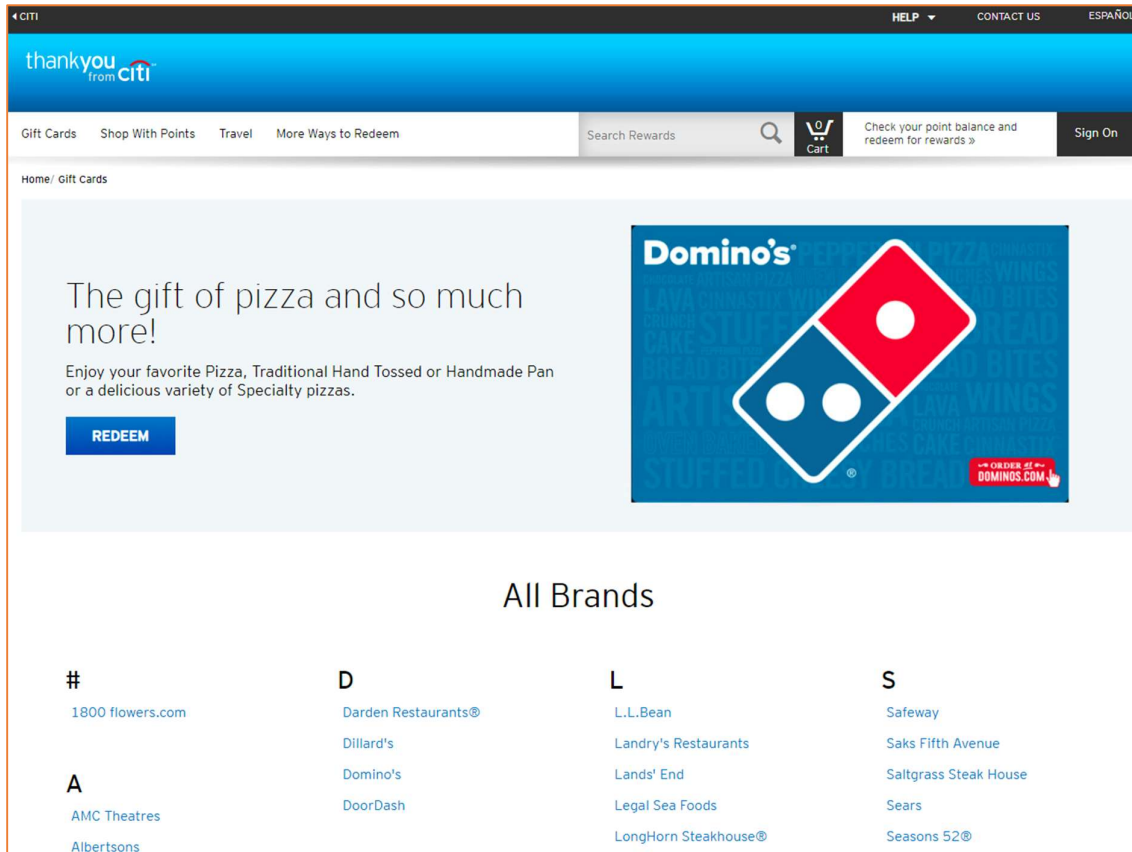
89. Kioba repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

90. On information and belief, Citibank is in violation 35 U.S.C. § 271(a) and (b) with respect to one or more claims of the '134 patent.

91. On information and belief, Citibank (or those acting on its behalf) (i) made, used, sold, imported and/or offered to sell the Citibank Products and Services; (ii) made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Citibank System; and (iii) induced its customers to use the Citibank Products and Services and the Citibank System, in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 30 of the '134 patent.

92. On information and belief, one or more components of the Citibank System employed and provided a computer software product for use by a purchasing processor operated by a cardholder, the computer software product for conducting a financial transaction between the cardholder and a merchant, wherein

the cardholder makes a purchase from the merchant using credit established at a financial institution, the computer software product includes a medium readable by the purchasing processor. For example, Citigroup provides the Thank You Rewards Portal (“Rewards Portal”) that allows cardholders to make purchases via a browser.



See, e.g., <https://www.thankyou.com/gcLanding.htm?TYUSENG&src=TYUSENG>.

Gift Cards & Travel Rewards



Gift Cards

Dining, shopping, and entertainment. It's all yours when you use points for gift cards to major brands.

[VIEW BRANDS](#)



Travel Rewards

Use your points to go places. Book airline flights, hotel stays, car rentals, cruises and experiences.

[EXPLORE REWARDS](#)

Shop with Points



Use Points at Partners

ThankYou members with an eligible Citi credit card can use ThankYou Points at participating online partners.

[GET STARTED](#)

See, e.g.,

<https://www.thankyou.com/cms/thankyou/mwr.page?pageName=mwr&src=TY>

USENG.

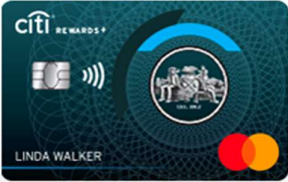
- **No Affiliation with Rewards Merchants.** Participating Rewards merchants aren't affiliated with or responsible for administration of the Program.

GIFT CARD TERMS & CONDITIONS

Gift cards/certificates: Gift cards/certificates are subject to the terms and conditions set by the merchant who issues the gift card/certificate. Citibank is in no way affiliated with the issuers of the gift cards/certificates nor are they considered sponsors or co-sponsors of ThankYou Rewards. Any use of the merchant names and/or logos is by permission of each respective merchant and all trademarks are the property of their respective owners. Expiration policies and non-usage fees may apply; however, expiration on gift cards will occur in no less than five (5) years from the date of redemption and non-usage fees cannot begin until twelve months of non-use and the non-usage fee must remain the same from month to month through ThankYou Rewards. Gift cards/certificates may not be returned, unless damaged or defective.

See, e.g.,

<https://www.thankyou.com/cms/thankyou/tc.page?hash=GiftCardTC&pageName=tc&src=TYUSENG>.



Citi Rewards+SM Card

Earn 15,000 bonus points after you spend \$1,000 in purchases with your card within 3 months of account opening.

Bonus ThankYou[®] Points are not available if you received a new cardmember bonus for Citi Rewards+SM, Citi ThankYou[®] Preferred, Citi ThankYou[®] Premier/Citi PremierSM or Citi Prestige[®], or if you have closed any of these accounts, in the past 24 months.

0% Intro APR on balance transfers and purchases for 15 months. After that, the variable APR will be 13.49% - 23.49%, based on your creditworthiness.¹

Earn 2X ThankYou[®] Points at Supermarkets and Gas Stations for the first \$6,000 per year and then 1X Points thereafter. Plus, earn 1X Points on All Other Purchases.

Round Up every purchase to the nearest 10 points - with no cap.

Get 10% Points Back for the first 100,000 ThankYou[®] Points you redeem per year.

See, e.g.,

https://www.citicards.com/cards/credit/application/flow.action?app=UNSOL&cmp=knc|acquire|2006|CARDS|Google|BR&gclid=CjwKCAjw1K75BRAEEiwAd41h1Gym9KHqUfR1jFXE7R0pKnFB3ewfJwvL7zUP6Io1Kj-bpdWzdhqtQhoCp4EQAvD_BwE&gclsrc=aw.ds&ProspectID=2062EFEB0E4A49C890E691EF9033839F&ID=3131&HKOP=dbdad6d490636b35377f92532c6bff9ba2c0833d083bda1aeedd88a9b86dbb79.

Gift Cards Shop With Points Travel More Ways to Redeem Search Rewards Check your point balance and redeem for rewards [Sign On](#)

Home / Gift Cards / Restaurants / Darden Restaurants® Gift Card

Darden Restaurants® Gift Card \$25
Starting at 2,500 points

DENOMINATION

DELIVERY

QUANTITY

IS THIS A GIFT? PERSONALIZE AT CHECKOUT

PRODUCT INFORMATION **DELIVERY AND RETURNS**

Product Code: 5YRGDAZ7YFRH4NTNC9R0W2SY0W-E25

Darden® Restaurants Gift Cards can be used for Take Out and Delivery orders at all of our restaurants. Darden Restaurants Gift Cards are redeemable at Olive Garden, LongHorn Steakhouse, Cheddar's Scratch Kitchen, Yard House, The Capital Grille, Seasons 52, Bahama Breeze and Eddie V's. To see our latest offers click here.

Merchant Terms & Conditions

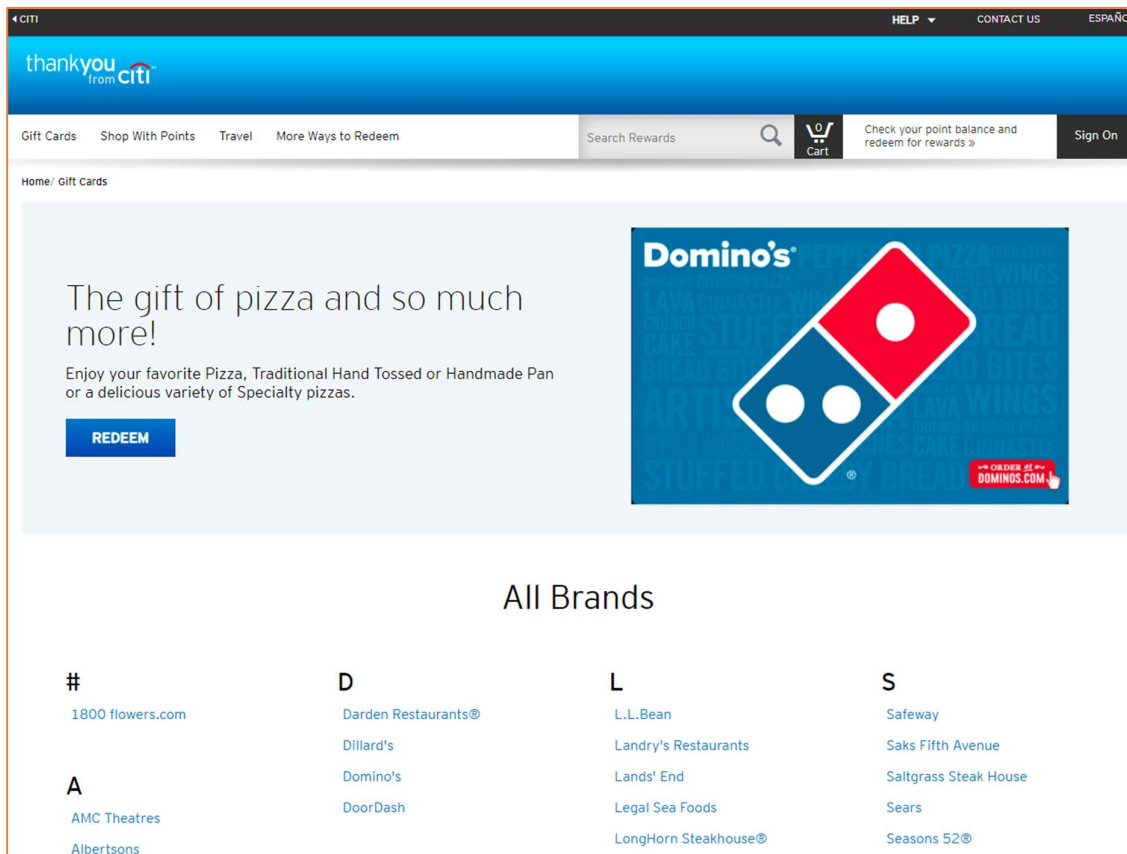
Use of this Card constitutes acceptance of the Gift Card terms and conditions. This Gift Card is issued by and represents an obligation solely of Darden SV, Inc. ("Darden"). Each time you use it, we'll deduct that amount from the balance until you've used the full balance of the card. (1) Except where required by law, this gift card is not redeemable for cash. (2) We can't replace the value on this card if it's lost or stolen. (3) Valid at participating restaurants in the U.S. (4) Approval is required to advertise this card; (5) This eGift Card may not be used to purchase alcohol where prohibited by law; (6) eGift Card does not expire; (7) This eGift Card deemed purchase from and issued in the State of Florida; (8) Risk of loss and title to the eGift Card passes to the purchaser upon electronic transmission to the recipient; (9) eGift Card balance may not be transferred to a physical gift card; however, eGift Card may be printed or reprinted for redemption. For eGift Card balance, activity and complete terms and conditions (including agreement to arbitrate and waiver of jury trial) visit www.darden.com or call toll-free 1-877-500-9706. © 2020 Darden Concepts, Inc. Darden® Restaurants Gift Card can be redeemed at any Olive Garden®, LongHorn Steakhouse®, Cheddar's Scratch Kitchen®, Bahama Breeze®, Seasons 52® or Yard House® restaurant in the U.S. Gift Cards are redeemable for online Take Out, Curbside and Catering Orders.

See, e.g.,

https://www.thankyou.com/gcProductDetail.htm?productId=5YRGDAZ7YFRH4NTNC9R0W2SY0W&src=TYUSENG&cmp=nav&lid=clp|gift_card|body|brand|link_int|text|darden_restaurants.

93. On information and belief, one or more components of the Citibank System employed and provided a readable medium that includes a first sequence of instructions which, when executed by said purchasing processor, causes said purchasing processor to receive information about the purchase and a merchant identifier. For example, the Rewards Portal includes links which, when executed by

the purchasing processor, cause the purchasing processor to receive information about the purchase and a merchant identifier.



See, e.g., <https://www.thankyou.com/gcLanding.htm?TYUSENG&src=TYUSENG>.

The screenshot displays the product page for a Darden Restaurants® Gift Card \$25. The page includes a navigation bar at the top with options like 'Gift Cards', 'Shop With Points', and 'Travel'. The main content area features a grid of restaurant logos: Olive Garden, LongHorn Steakhouse, Cheddar's Scratch Kitchen, Yard House, Bahama Breeze, and Seasons 52. To the right of the logos, the product title 'Darden Restaurants® Gift Card \$25' is shown, along with the starting point value of 2,500. Below this, there are sections for 'DENOMINATION' (with buttons for \$25, \$50, and \$100), 'DELIVERY' (with buttons for EMAIL and MAIL), and 'QUANTITY' (with a quantity selector set to 1). A blue 'ADD TO CART' button is prominently displayed. At the bottom of the page, there are two tabs: 'PRODUCT INFORMATION' and 'DELIVERY AND RETURNS'. The 'PRODUCT INFORMATION' section contains the product code '5YRGDAZ7YFRH4NTNC9R0W2SY0W-E25' and a paragraph of text explaining the card's use. The 'DELIVERY AND RETURNS' section is currently selected but empty. A 'Merchant Terms & Conditions' section follows, containing a detailed paragraph of legal terms.

See, e.g.,

https://www.thankyou.com/gcProductDetail.htm?productId=5YRGDAZ7YFRH4NTNC9R0W2SY0W&src=TYUSENG&cmp=nav&lid=clp|gift_card|body|brand|link_int|text|darden_restaurants.

94. On information and belief, one or more components of the Citibank System employed and provided a readable medium that includes a second sequence of instructions which, when executed by said purchasing processor, causes said purchasing processor to transmit a request to pay to the financial institution, the request to pay includes the information about the purchase, the merchant identifier

and a cardholder identifier and instructs the financial institution to purchase a selected item for the cardholder. For example, the Rewards Portal includes a Check Out feature. When executed, the Check Out feature causes the browser to transmit to Citigroup a request to pay. The request includes information about the desired item, the merchant identifier (e.g., Item ID and merchant name), and the cardholder's account. The request also instructs Citigroup to purchase the selected item for the cardholder.

95. On information and belief, Citibank directly infringed at least claim 30 of the '134 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Citibank Products and Services; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Citibank System.

96. On information and belief, Citibank has been on notice of the '134 patent since at least as early as the May 2020 Notice Letter and/or the August 2020 Notice Letter concerning its infringement of the Patents-in-Suit.

97. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter, Citibank knowingly encouraged its customers to directly infringe one or more claims of the '134 patent, including by Citibank's actions that include, without limitation, instructing and encouraging its customers to use the Citibank Products and Services and the Citibank System, including but not limited to the examples cited above.

98. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter regarding the Patents-in-Suit, Citibank knew

the acts it induced its customers to take constituted patent infringement and Citibank's encouraging acts resulted in direct infringement of one or more claims of the '134 patent by its customers.

99. On information and belief, Citibank instructed and continues to instruct customers to use the Citibank Products and Services and the Citibank System, including, without limitation, through Citibank's website, which provides access to, and support for therefore.

100. On information and belief, Citibank's customers directly infringed at least claim 30 of the '134 patent through their use of the Citibank Products and Services and the Citibank System.

101. On information and belief, Citibank is in violation of 35 U.S.C. § 271(b) and has, at least since its May and/or August 2020 knowledge of the '134 patent, indirectly infringed at least claim 30 of the '134 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Citibank's customers) and possessing specific intent to encourage infringement by Citibank's users of the Citibank Products and Services and the Citibank System. The components of the Citibank Products and Services and the Citibank System are specifically configured to function in accordance with the '134 patent claims and are material parts of the invention.

102. Citibank's direct and indirect infringement has damaged Kioba and caused it to suffer damages.

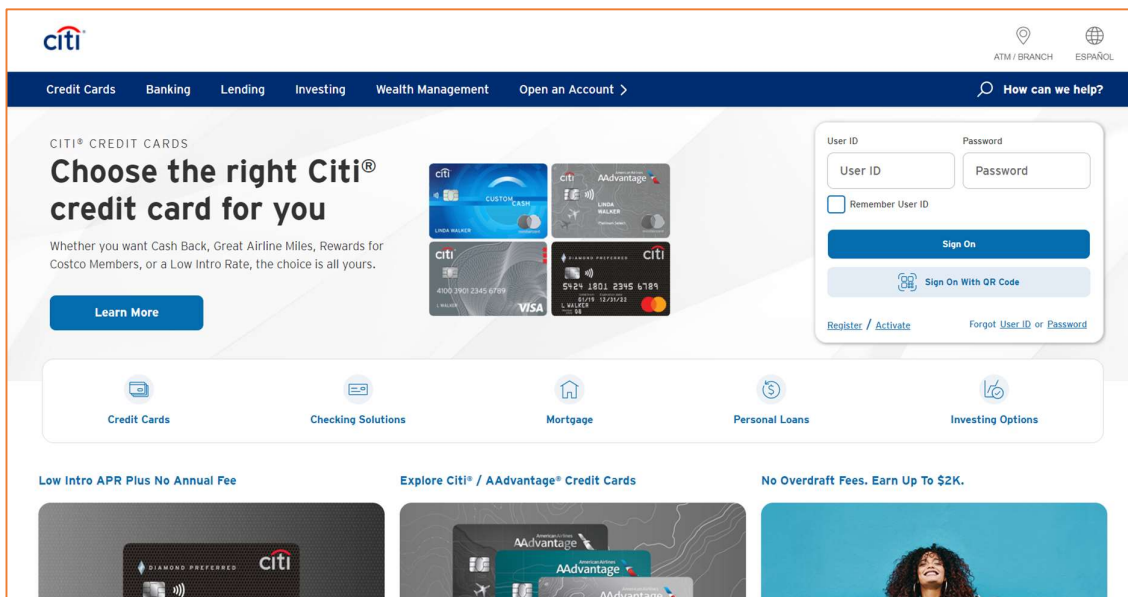
Count II - Infringement of United States Patent No. 6,862,610

103. Kioba repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

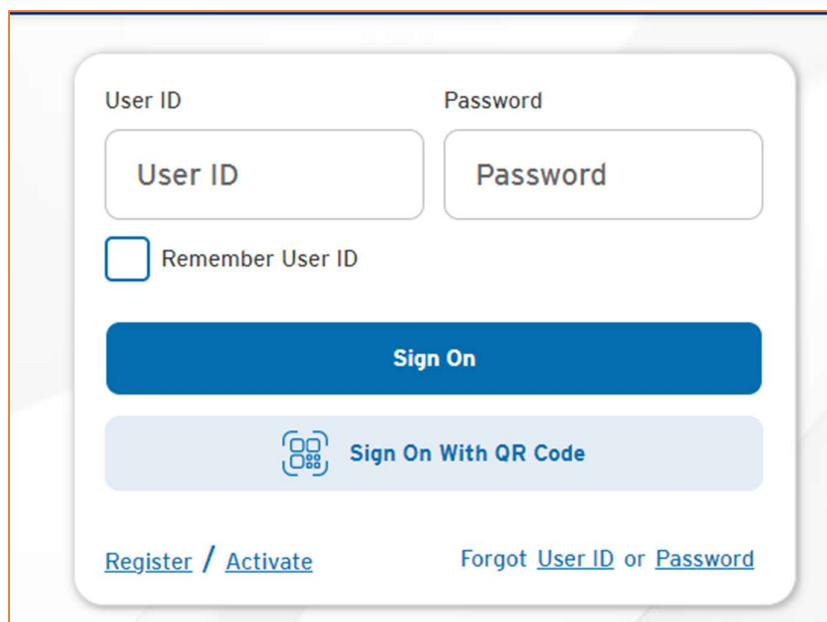
104. On information and belief, Citibank is in violation 35 U.S.C. § 271(a) and (b) with respect to one or more claims of the '610 patent.

105. On information and belief, Citibank (or those acting on its behalf) (i) made, used, sold, imported and/or offered to sell the Citibank Products and Services; (ii) made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Citibank System; and (iii) induced its customers to use the Citibank Products and Services and the Citibank System, in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 1 of the '610 patent.

106. On information and belief, one or more components of the Citibank System employed and provided a method for verifying the identity of users connected to a computer network. The method (e.g., validating user information at the 'forgot password' terminal) includes identifying users (e.g., account holders) connected to a computer network that supports Citibank's online and mobile banking services.



See e.g., <https://www.citi.com>.



See e.g., <https://www.citi.com>.

citi

Having Trouble Signing On?

Select an account type and use the Primary Account Holder's Information to verify your identity.

Checking, Savings or Credit Card Customers

ATM/Debit or Credit Card Number

Mortgage Only Customers

SBA Paycheck Protection Program Customers

Certificate of Deposit Only Customers

Brokerage Only Customers

Personal Loan Only Customers

Continue **Cancel**

Chat

See e.g., <https://online.citi.com/US/ag/forgot-userid-pwd/account-type?fuipFlowInd=pwd>.

107. On information and belief, one or more components of the Citibank System employed and provided a method for providing fractional information queries (e.g., Debit/Credit card number, DoB, SSN, Security word, etc.) to said users (e.g., account holder), wherein responses to individual ones of said fractional information queries are not sufficient to identify a said user.

citi

Having Trouble Signing On?

Select an account type and use the Primary Account Holder's Information to verify your identity.

Checking, Savings or Credit Card Customers

ATM/Debit or Credit Card Number

Mortgage Only Customers

SBA Paycheck Protection Program Customers

Certificate of Deposit Only Customers

Brokerage Only Customers

Personal Loan Only Customers

Continue **Cancel**

Chat

See e.g., <https://online.citi.com/US/ag/forgot-userid-pwd/account-type?fuipFlowInd=pwd>.

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Sign On Help - Credit Card Account Details


Provide the information requested below.

Credit Card Number
XXXX XXXX XXXX 5432 [Edit](#)

Select one of the following

I am the Primary Cardmember of this account

I am an Authorized User of this account

Credit Card CVV/CID 

You may access your account with your temporary CVV upto 10 days after you're approved or with the CVV found on the back of your credit card, once you receive it in the mail

Select one of the following and use the primary card member's information to complete identification verification:

Date of Birth

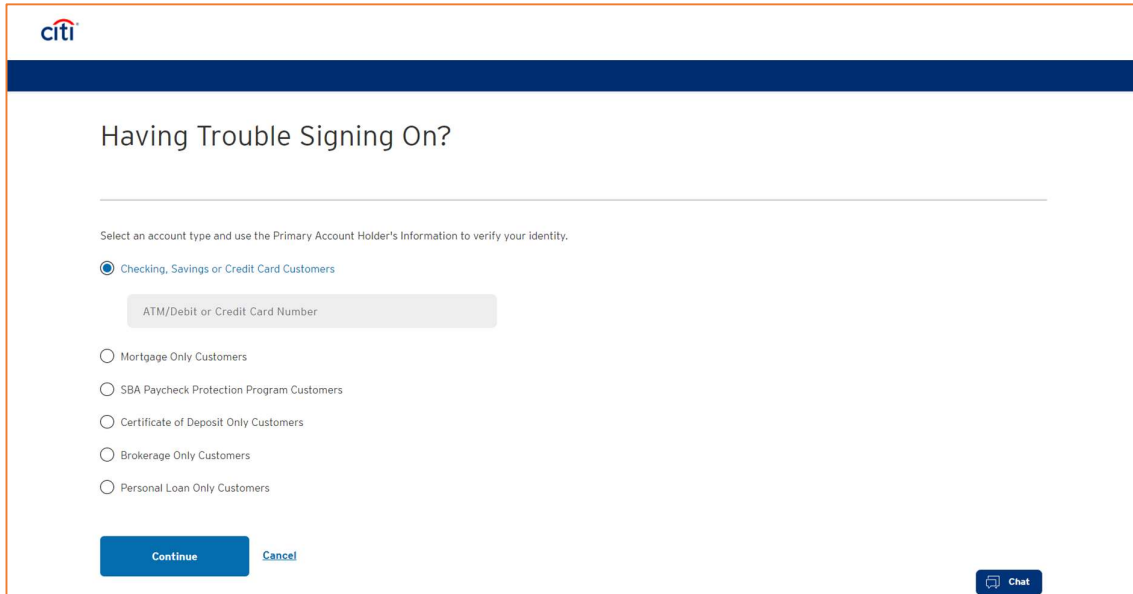
Last 4 of SSN or ITIN

Security Word

[Chat](#)

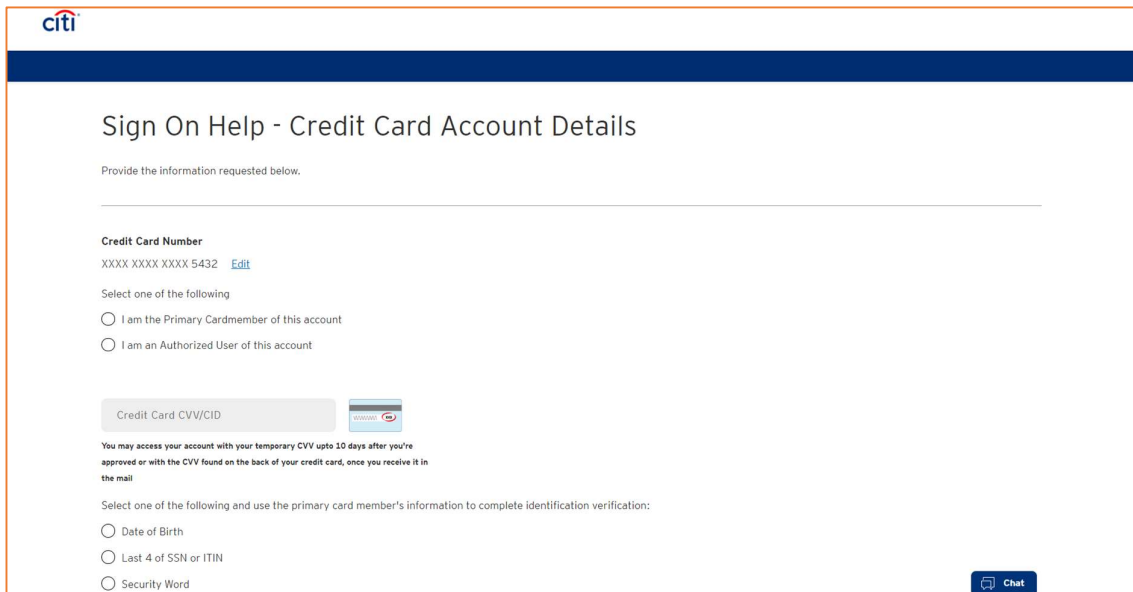
See e.g., <https://online.citi.com/US/ag/forgot-userid-pwd/credit-card-account-details>.

108. On information and belief, one or more components of the Citibank System employed and provided a method for receiving responses (e.g., receiving Debit/Credit card number, DoB, SSN, Security word, etc.) from users and comparing responses to data (e.g., data provided during registration) available from within network.



The screenshot shows the Citi website's 'Having Trouble Signing On?' page. At the top left is the Citi logo. Below it, the heading 'Having Trouble Signing On?' is displayed. A horizontal line separates the heading from the instructions: 'Select an account type and use the Primary Account Holder's Information to verify your identity.' There are five radio button options: 'Checking, Savings or Credit Card Customers' (which is selected), 'Mortgage Only Customers', 'SBA Paycheck Protection Program Customers', 'Certificate of Deposit Only Customers', and 'Personal Loan Only Customers'. Below these options is a text input field labeled 'ATM/Debit or Credit Card Number'. At the bottom left are 'Continue' and 'Cancel' buttons. At the bottom right is a 'Chat' button.

See e.g., <https://online.citi.com/US/ag/forgot-userid-pwd/account-type?fuiFlowInd=pwd>.

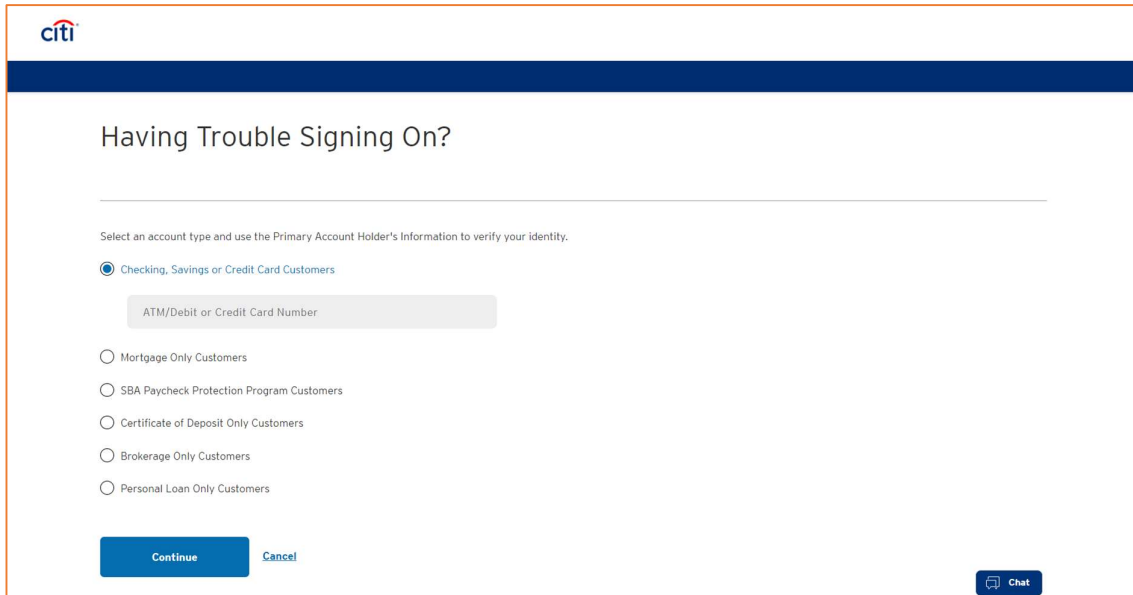


The screenshot shows the Citi website's 'Sign On Help - Credit Card Account Details' page. At the top left is the Citi logo. Below it, the heading 'Sign On Help - Credit Card Account Details' is displayed. A horizontal line separates the heading from the instructions: 'Provide the information requested below.' There is a section for 'Credit Card Number' showing 'XXXX XXXX XXXX 5432' with an 'Edit' link. Below this are two radio button options: 'I am the Primary Cardmember of this account' and 'I am an Authorized User of this account'. There is a text input field for 'Credit Card CVV/CID' with a small image of a credit card to its right. Below this is a note: 'You may access your account with your temporary CVV upto 10 days after you're approved or with the CVV found on the back of your credit card, once you receive it in the mail'. At the bottom, there are three radio button options for identification verification: 'Date of Birth', 'Last 4 of SSN or ITIN', and 'Security Word'. At the bottom right is a 'Chat' button.

See e.g., <https://online.citi.com/US/ag/forgot-userid-pwd/credit-card-account-details>.

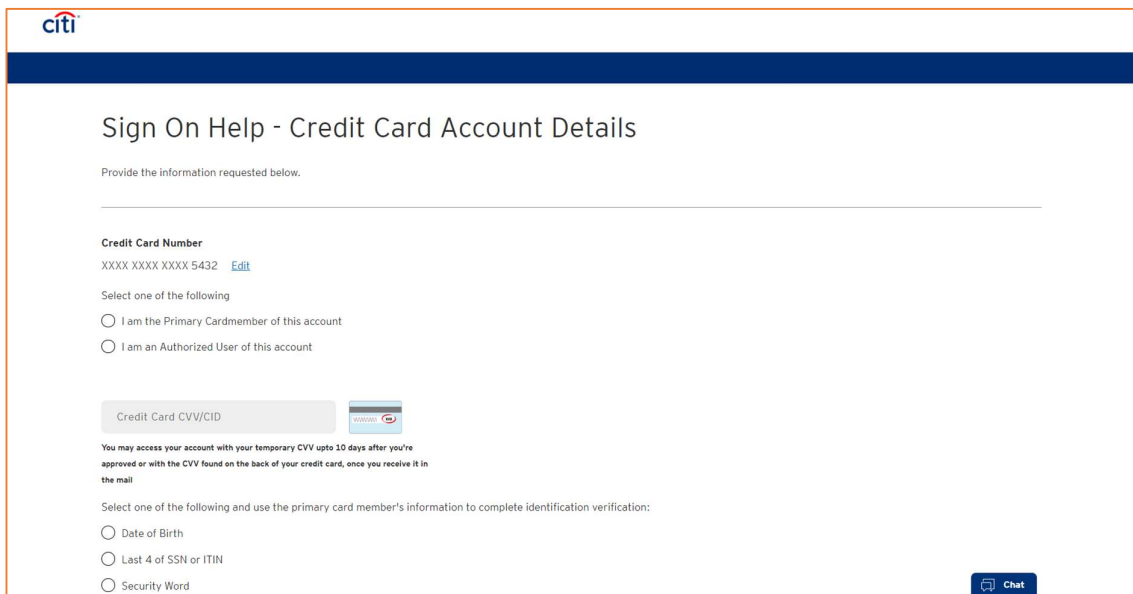
109. On information and belief, one or more components of the Citibank System employed and provided a method for generating at least one set of potential matches to user from responses to fractional information queries (e.g., Debit/Credit

card number, DoB, SSN, Security word, etc.) and verifying identity of said user if said set of potential matches is deemed sufficient.



The screenshot shows the Citi website's 'Having Trouble Signing On?' page. At the top left is the Citi logo. Below it is a dark blue header bar. The main heading is 'Having Trouble Signing On?'. Underneath, there is a horizontal line and a sub-heading: 'Select an account type and use the Primary Account Holder's Information to verify your identity.' There are five radio button options: 'Checking, Savings or Credit Card Customers' (selected), 'Mortgage Only Customers', 'SBA Paycheck Protection Program Customers', 'Certificate of Deposit Only Customers', and 'Personal Loan Only Customers'. A text input field labeled 'ATM/Debit or Credit Card Number' is positioned below the first option. At the bottom left are 'Continue' and 'Cancel' buttons. At the bottom right is a 'Chat' button with a speech bubble icon.

See e.g., <https://online.citi.com/US/ag/forgot-userid-pwd/account-type?fuipFlowInd=pwd>.



The screenshot shows the Citi website's 'Sign On Help - Credit Card Account Details' page. At the top left is the Citi logo. Below it is a dark blue header bar. The main heading is 'Sign On Help - Credit Card Account Details'. Underneath, there is a horizontal line and a sub-heading: 'Provide the information requested below.' There is a 'Credit Card Number' field with the placeholder text 'XXXX XXXX XXXX 5432' and an 'Edit' link. Below this is the instruction 'Select one of the following' and two radio button options: 'I am the Primary Cardmember of this account' and 'I am an Authorized User of this account'. There is a 'Credit Card CVV/CID' field with a small image of a credit card. Below this is a note: 'You may access your account with your temporary CVV upto 10 days after you're approved or with the CVV found on the back of your credit card, once you receive it in the mail'. At the bottom, there is the instruction 'Select one of the following and use the primary card member's information to complete identification verification:' and three radio button options: 'Date of Birth', 'Last 4 of SSN or ITIN', and 'Security Word'. At the bottom right is a 'Chat' button with a speech bubble icon.

See e.g., <https://online.citi.com/US/ag/forgot-userid-pwd/credit-card-account-details>.

110. On information and belief, Citibank directly infringed at least claim 1 of the '610 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Citibank Products and Services; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Citibank System.

111. On information and belief, Citibank has been on notice of the '610 patent since at least as early as the May 2020 Notice Letter and/or the August 2020 Notice Letter concerning its infringement of the Patents-in-Suit.

112. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter, Citibank knowingly encouraged its customers to directly infringe one or more claims of the '610 patent, including by Citibank's actions that include, without limitation, instructing and encouraging its customers to use the Citibank Products and Services and the Citibank System, including but not limited to the examples cited above.

113. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter regarding the Patents-in-Suit, Citibank knew the acts it induced its customers to take constituted patent infringement and Citibank's encouraging acts resulted in direct infringement of one or more claims of the '610 patent by its customers.

114. On information and belief, Citibank instructed and continues to instruct customers to use the Citibank Products and Services and the Citibank System, including, without limitation, through Citibank's website, which provides access to, and support for therefore.

115. On information and belief, Citibank's customers directly infringed at least claim 1 of the '610 patent through their use of the Citibank Products and Services and the Citibank System.

116. On information and belief, Citibank is in violation of 35 U.S.C. § 271(b) and has, at least since its May and/or August 2020 knowledge of the '610 patent, indirectly infringed at least claim 1 of the '610 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Citibank's customers) and possessing specific intent to encourage infringement by Citibank's users of the Citibank Products and Services and the Citibank System. The components of the Citibank Products and Services and the Citibank System are specifically configured to function in accordance with the '610 patent claims and are material parts of the invention.

117. Citibank's direct and indirect infringement has damaged Kioba and caused it to suffer damages.

Count III - Infringement of United States Patent No. 6,917,902

118. Kioba repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

119. On information and belief, Citibank is in violation 35 U.S.C. § 271(a) and (b) with respect to one or more claims of the '902 patent.

120. On information and belief, Citibank (or those acting on its behalf) (i) made, used, sold, imported and/or offered to sell the Citibank Products and Services; (ii) made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Citibank System; and (iii) induced it customers to use the

Citibank Products and Services and the Citibank System, in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 1 of the '902 patent.

121. On information and belief, one or more components of the Citibank System employed and provided a method for processing monitoring device data received from at least one of the plurality of monitoring devices (e.g., a smartphone) comprising obtaining monitoring device data characteristic of an individual (e.g., fingerprint authentication or Touch ID or Face ID) from at least one of the plurality of monitoring devices.

citi Home About Us Global Network Advisory Insights Solutions

CitiDirect is everywhere you need to be.

Citi's next-generation banking platform CitiDirect® provides one-click access to global transaction capabilities using an intuitive and user-centric workflow. CitiDirect supports multiple transaction types across multiple geographies, subsidiaries and currencies. Users can manage accounts, payments, receivables, liquidity, trade, foreign exchange and reporting across the globe with CitiDirect online and mobile versions. You can access the power of CitiDirect on the web and on your mobile device with the CitiDirect app. (version 2.7.0)

Designed for you

Simple Payment: A faster and simpler way to submit a manual payment. CitiDirect® will automatically populate beneficiary and payment details based on previously completed manually submitted transactions. Let CitiDirect do the work for you when you want to make a manual payment and free time for other tasks. It leverages Historical Payment Data to assist you with payment initiation:

- Simply select who you want to pay, how much and when.
- You no longer need to re-enter the Beneficiary and Payment details.
- Simply click "Make Another Payment" button from Summary screen to make the next payment.

CitiDirect Widgets:

A quick and convenient way to access services you need for your day-to-day treasury and trade activities such as Initiate, View, Authorize and Release payments. Also there are various reports and the ability to view account balances. All this is available directly on your homepage, and can be fully customized to meet your needs.

MobilePASS

As an alternative to carrying a physical token, the new MobilePASS application can be installed and activated on your mobile device to provide a faster, easier and more convenient way to log in to CitiDirect.

Biometrics

It is a digital authentication method that utilizes a user's unique physical traits and the built-in biometrics technology on the user's mobile device, such as fingerprint and facial recognition, to gain access to CitiDirect. With the CitiDirect App, you can now leverage new authentication methods to log in securely to CitiDirect. Biometric Authentication is a digital authentication method that utilizes a user's unique physical traits and built-in biometric technology on the user's mobile device.

Easy account opening


CitiDirect Digital Onboarding simplifies and digitizes your onboarding experience. The new digital onboarding experience will allow you to complete the Account Opening process online, as well as track the status of your account opening. CitiDirect is a single window into Citi's digital onboarding process. You can initiate, track the status, provide information, and complete an entire account opening online through CitiDirect, with less information required.

Innovative solutions

New payment options, working capital solutions and cash management services are created at an increasing rate. CitiDirect supports this innovation through continued improvements and upgrades.


See e.g., <https://www.citi.com/tts/solutions/digital-channels-data/citidirect/index.html>.


Treasury and Trade Solutions




What is Biometric Login on CitiDirect BE®?


With CitiDirect BE® App, you can now leverage new authentication methods to log in securely to CitiDirect BE. Biometric Authentication is a digital authentication method that utilizes a user's unique physical traits and built-in biometric technology on the user's mobile device. Physical trait data is not transferred to the Bank when the user selects this authentication method.



 Fingerprint



 Facial Recognition*

How it works


Download
 CitiDirect BE App





Enter
 User ID and Password
 and authenticate
 your access


Enable
 enable biometric
 authentication for
 CitiDirect BE App


Access
 CitiDirect BE App

Access
 CitiDirect BE desktop

Benefits

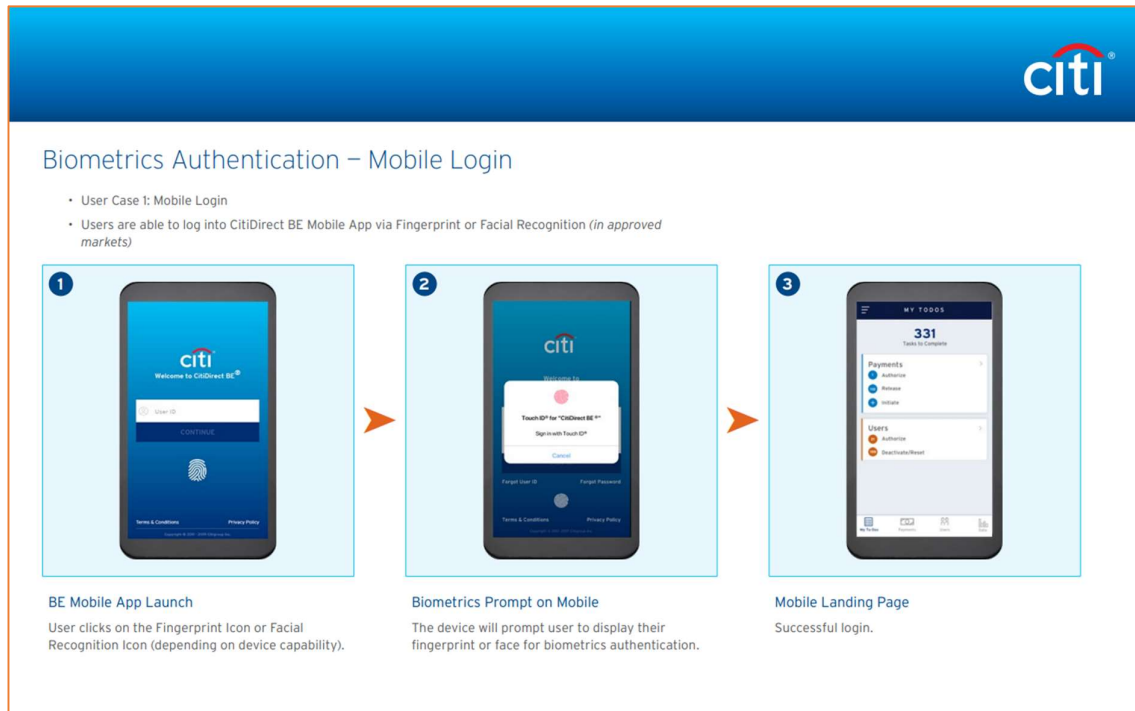
-  **Secure**
 Rely on an individual's
 unique physical traits
-  **Convenient**
 Simple setup on mobile device
-  **Fast**
 Quicker login eliminating
 separate password tokens

Contact your Citi Representative today to enable Biometrics for your company.

* Available for iPhone X and above only

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1782087 12/18

See e.g., https://www.citi.com/tts/email/2018/tts/104980-digital-channels-toolkit/Biometrics_Glance.pdf.



See e.g., <https://www.citibank.com/tts/email/2019/channel-services/105675-cdbe-mobile/Mobile-App-Interactive-User-Guide-June-2019.pdf>.

122. On information and belief, one or more components of the Citibank System employed and provided a method for processing monitoring device data received from at least one of the plurality of monitoring devices (e.g., a smartphone) comprising associating at least one data profile corresponding to a data type of the obtained monitoring device data, wherein the data profile includes an identification of a data processing template, at least one processing rule and at least one action assessment corresponding to the processing of the data processing template and at least one processing rule.

Treasury and Trade Solutions citi

What is Biometric Login on CitiDirect BE®?

With CitiDirect BE® App, you can now leverage new authentication methods to log in securely to CitiDirect BE. Biometric Authentication is a digital authentication method that utilizes a user's unique physical traits and built-in biometric technology on the user's mobile device. Physical trait data is not transferred to the Bank when the user selects this authentication method.

Fingerprint
Facial Recognition*

How it works

Download
CitiDirect BE App

Enter
User ID and Password
and authenticate
your access

Enable
enable biometric
authentication for
CitiDirect BE App

Access
CitiDirect BE App

Access
CitiDirect BE desktop

Contact your Citi Representative today to enable Biometrics for your company.

Benefits

- Secure**
Rely on an individual's unique physical traits
- Convenient**
Simple setup on mobile device
- Fast**
Quicker login eliminating separate password tokens

* Available for iPhone X and above only

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See e.g., https://www.citi.com/tts/email/2018/tts/104980-digital-channels-toolkit/Biometrics_Glance.pdf.

citi

Biometrics Authentication – Mobile Login

- User Case 1: Mobile Login
- Users are able to log into CitiDirect BE Mobile App via Fingerprint or Facial Recognition (in approved markets)

1

BE Mobile App Launch
User clicks on the Fingerprint Icon or Facial Recognition Icon (depending on device capability).

2

Biometrics Prompt on Mobile
The device will prompt user to display their fingerprint or face for biometrics authentication.

3

Mobile Landing Page
Successful login.

See e.g., <https://www.citibank.com/tts/email/2019/channel-services/105675-cdbe-mobile/Mobile-App-Interactive-User-Guide-June-2019.pdf>.

123. On information and belief, one or more components of the Citibank System employed and provided a method for processing monitoring device data received from at least one of the plurality of monitoring devices (e.g., a smartphone) comprising processing the monitoring device data according to the at least one data profile.

Treasury and Trade Solutions **citi**

71%

What is Biometric Login on CitiDirect BE®?

With CitiDirect BE® App, you can now leverage new authentication methods to log in securely to CitiDirect BE. Biometric Authentication is a digital authentication method that utilizes a user's unique physical traits and built-in biometric technology on the user's mobile device. Physical trait data is not transferred to the Bank when the user selects this authentication method.

Fingerprint **Facial Recognition***

How it works

- Download** CitiDirect BE App
- Enter** User ID and Password and authenticate your access
- Enable** enable biometric authentication for CitiDirect BE App

Access CitiDirect BE App

Access CitiDirect BE desktop

Benefits

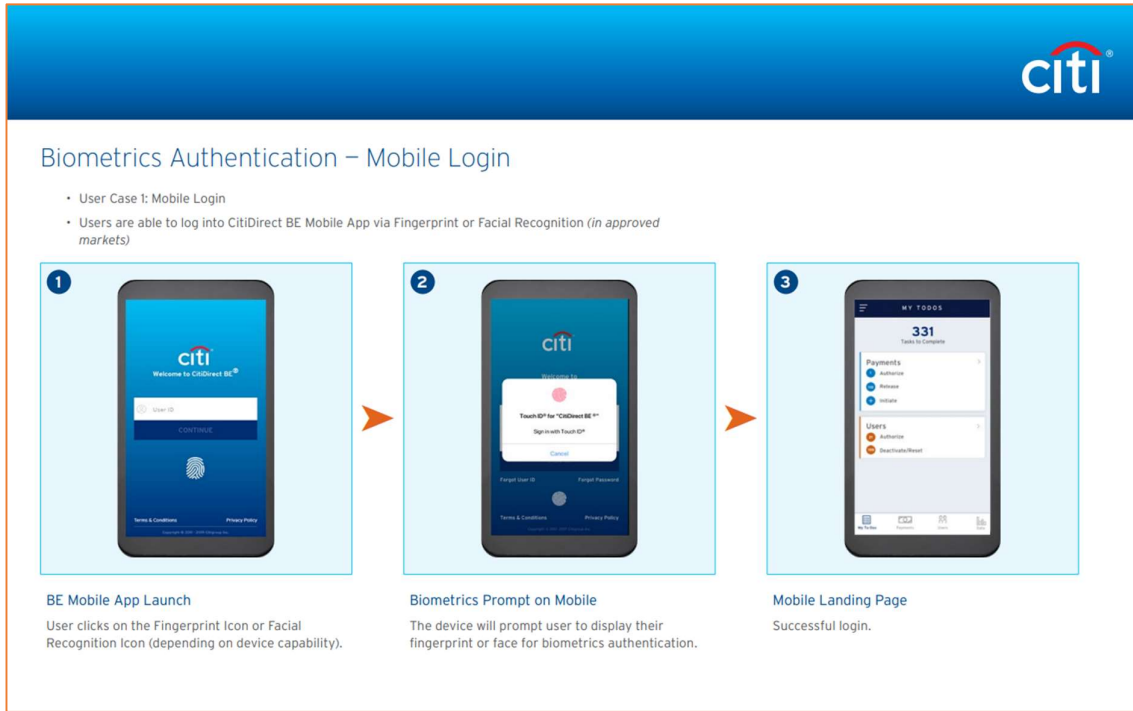
- Secure**
Rely on an individual's unique physical traits
- Convenient**
Simple setup on mobile device
- Fast**
Quicker login eliminating separate password tokens

Contact your Citi Representative today to enable Biometrics for your company.

* Available for iPhone X and above only

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See e.g., https://www.citi.com/tts/email/2018/tts/104980-digital-channels-toolkit/Biometrics_Glance.pdf.



See e.g., <https://www.citibank.com/tts/email/2019/channel-services/105675-cdbe-mobile/Mobile-App-Interactive-User-Guide-June-2019.pdf>.

124. On information and belief, one or more components of the Citibank System employed and provided a method for processing monitoring device data received from at least one of the plurality of monitoring devices (e.g., a smartphone) comprising generating an action assessment corresponding to the processing of the monitoring device data to the at least one data profile.

Treasury and Trade Solutions



What is Biometric Login on CitiDirect BE®?

With CitiDirect BE® App, you can now leverage new authentication methods to log in securely to CitiDirect BE. Biometric Authentication is a digital authentication method that utilizes a user's unique physical traits and built-in biometric technology on the user's mobile device. Physical trait data is not transferred to the Bank when the user selects this authentication method.

Fingerprint

Facial Recognition*

How it works

Download
CitiDirect BE App

Enter
User ID and Password
and authenticate
your access

Enable
enable biometric
authentication for
CitiDirect BE App

Access
CitiDirect BE App

Access
CitiDirect BE desktop

Benefits

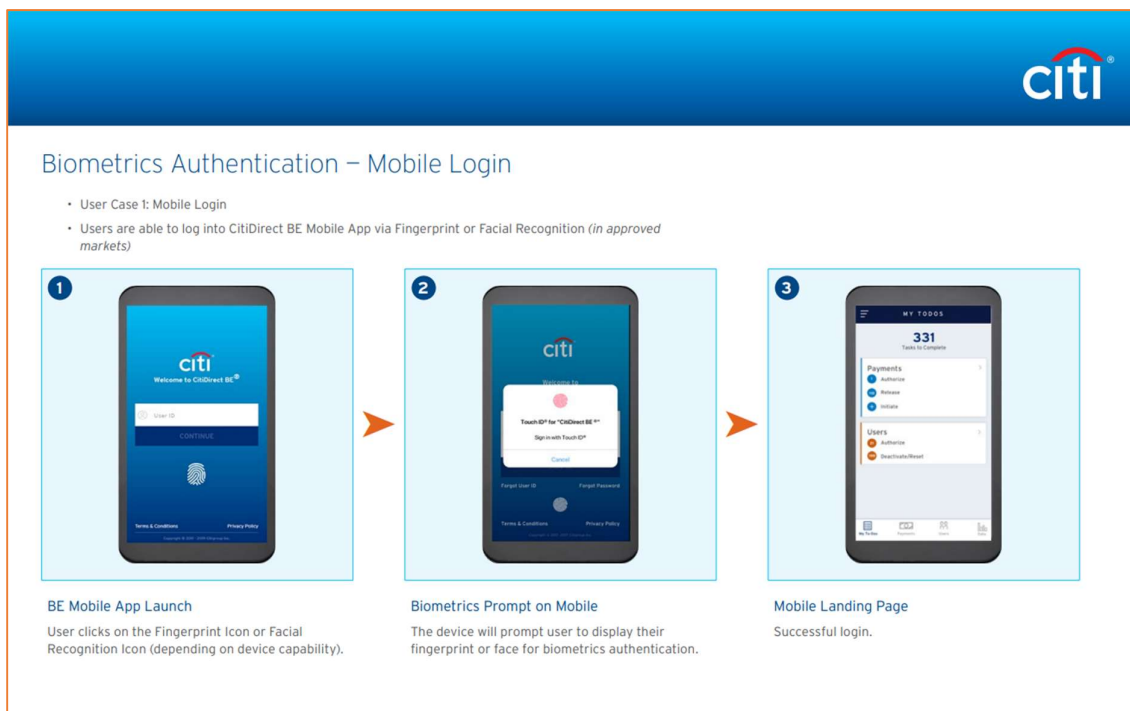
- Secure**
Rely on an individual's
unique physical traits
- Convenient**
Simple setup on mobile device
- Fast**
Quicker login eliminating
separate password tokens

Contact your Citi Representative today to enable Biometrics for your company.

* Available for iPhone X and above only

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See e.g., https://www.citi.com/tts/email/2018/tts/104980-digital-channels-toolkit/Biometrics_Glance.pdf.



See e.g., <https://www.citibank.com/tts/email/2019/channel-services/105675-cdbe-mobile/Mobile-App-Interactive-User-Guide-June-2019.pdf>.

125. On information and belief, Citibank directly infringed at least claim 1 of the '902 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Citibank Products and Services; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Citibank System.

126. On information and belief, Citibank has been on notice of the '902 patent since at least as early as the May 2020 Notice Letter and/or the August 2020 Notice Letter concerning its infringement of the Patents-in-Suit.

127. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter, Citibank knowingly encouraged its customers to directly infringe one or more claims of the '902 patent, including by Citibank's actions that include, without limitation, instructing and encouraging its customers to

use the Citibank Products and Services and the Citibank System, including but not limited to the examples cited above.

128. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter regarding the Patents-in-Suit, Citibank knew the acts it induced its customers to take constituted patent infringement and Citibank's encouraging acts resulted in direct infringement of one or more claims of the '902 patent by its customers.

129. On information and belief, Citibank instructed and continues to instruct customers to use the Citibank Products and Services and the Citibank System, including, without limitation, through Citibank's website, which provides access to, and support for therefore.

130. On information and belief, Citibank's customers directly infringed at least claim 1 of the '902 patent through their use of the Citibank Products and Services and the Citibank System.

131. On information and belief, Citibank is in violation of 35 U.S.C. § 271(b) and has, at least since its May and/or August 2020 knowledge of the '902 patent, indirectly infringed at least claim 1 of the '902 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Citibank's customers) and possessing specific intent to encourage infringement by Citibank's users of the Citibank Products and Services and the Citibank System. The components of the Citibank Products and Services and the Citibank System are specifically configured to function in accordance with the '902 patent claims and are material parts of the invention.

132. Citibank's direct and indirect infringement has damaged Kioba and caused it to suffer damages.

Count IV - Infringement of United States Patent No. 6,931,382

133. Kioba repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

134. On information and belief, Citibank has violated 35 U.S. C. § 271(b) with respect to one or more claims of the '382 patent.

135. On information and belief, Citibank (or those acting on its behalf) (i) made, used, sold, imported and/or offered to sell the Citibank Products and Services; (ii) made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Citibank System; and (iii) induced its customers to use the Citibank Products and Services and the Citibank System, in the United States that infringe (literally and/or under the doctrine of equivalents) at least claims 6 and 8 of the '382 patent.

136. On information and belief, when Citibank's customers used one or more components of the Citibank Products and Services and Citibank System, they practiced a method of protecting a payment instrument (*e.g.*, a debit card or credit card) used in transactions, the payment instrument being issued by an issuing entity (*e.g.*, Citibank and associated with an authorized instrument holder, the authorized instrument holder (*e.g.*, Citibank's customer) being subject to authentication by an authentication function.

October 20, 2017

Citibank Extends Quick Lock Convenience to Debit Cards

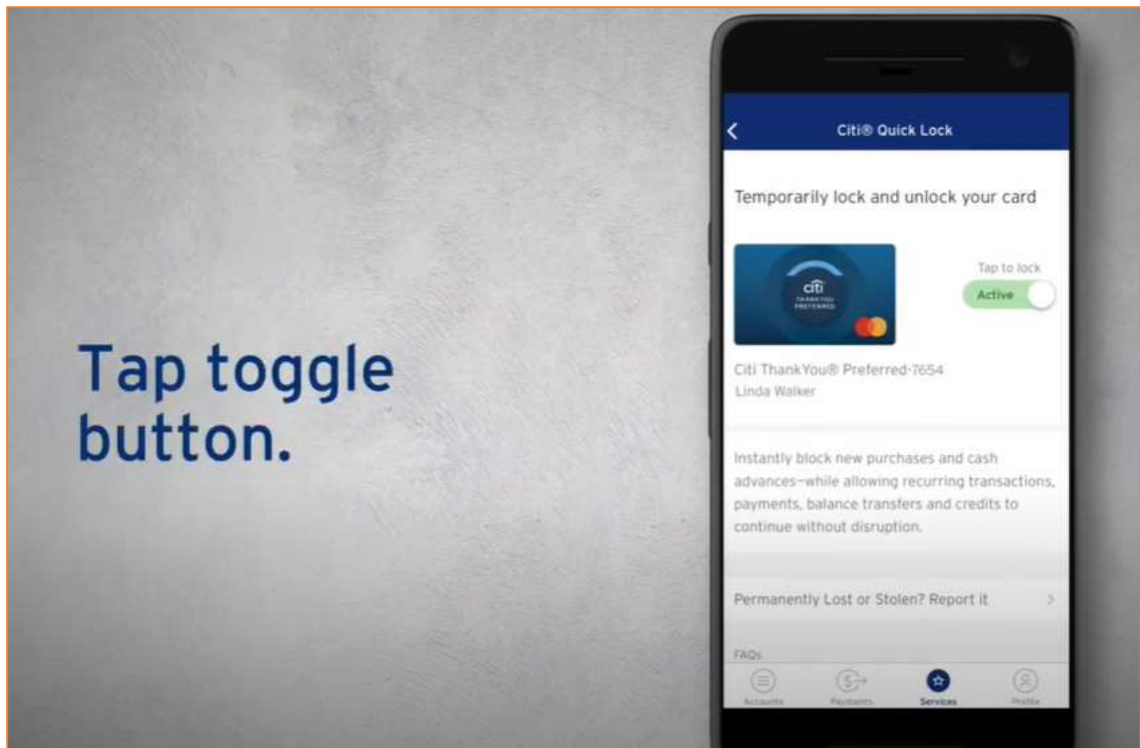
HIGHLIGHTS

Citi customers can now temporarily freeze both debit and credit cards

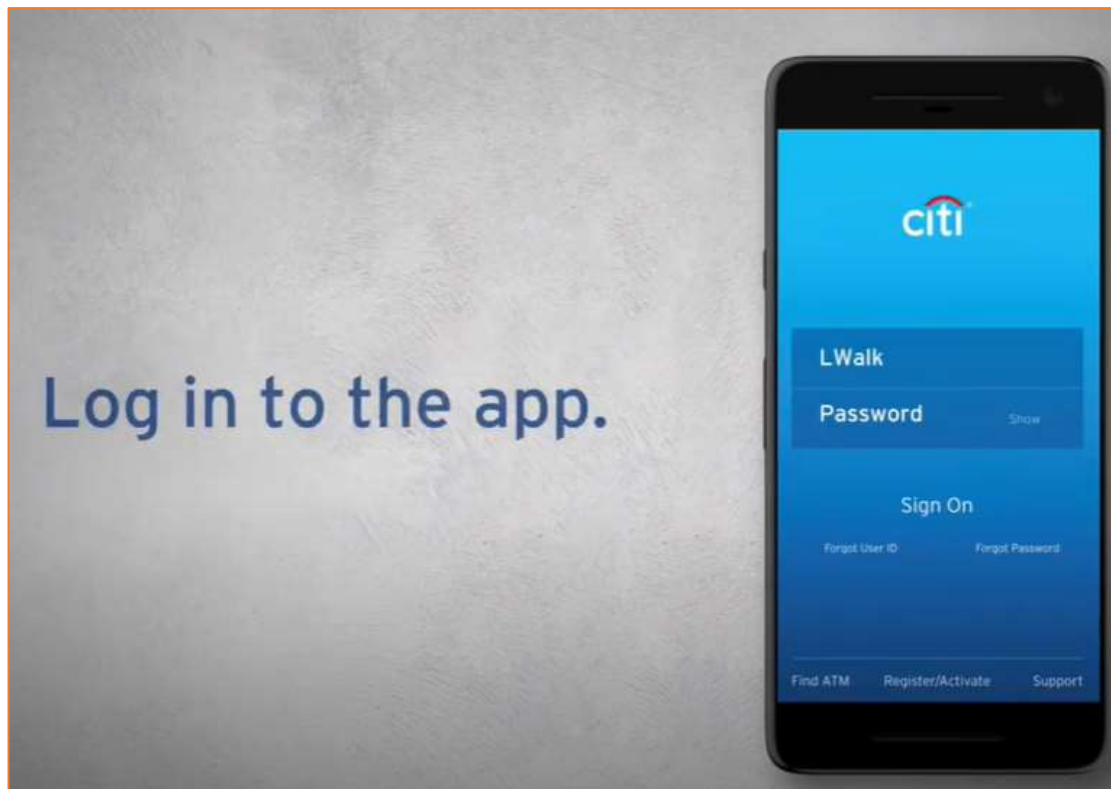
Instant ability to lock and unlock cards provides peace of mind

New York – Citibank has made it more convenient to protect your bank account by extending the popular Citi Quick Lock feature to debit cards, making it possible for both banking customers and credit cardmembers to quickly and easily lock their cards online or via its mobile app if a card is misplaced.

See, e.g., <https://www.citigroup.com/citi/news/2017/171020a.htm>.

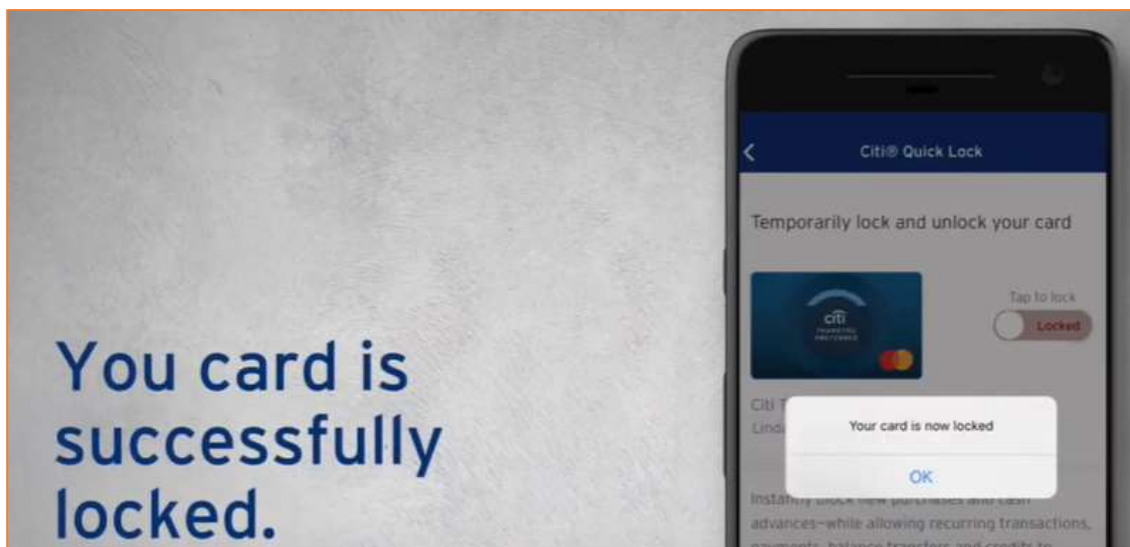


See, e.g., <https://www.youtube.com/watch?v=xqqUmfDq62Q>.



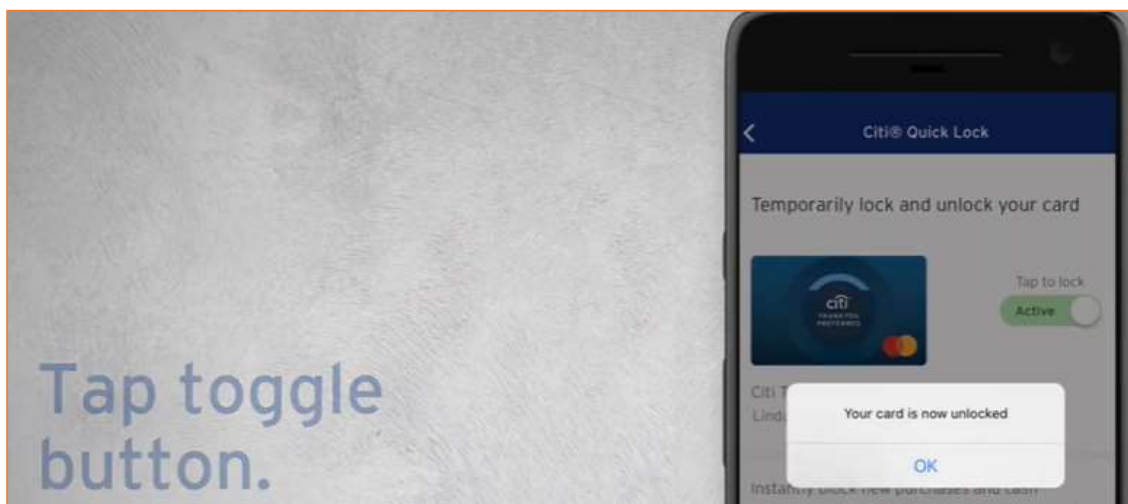
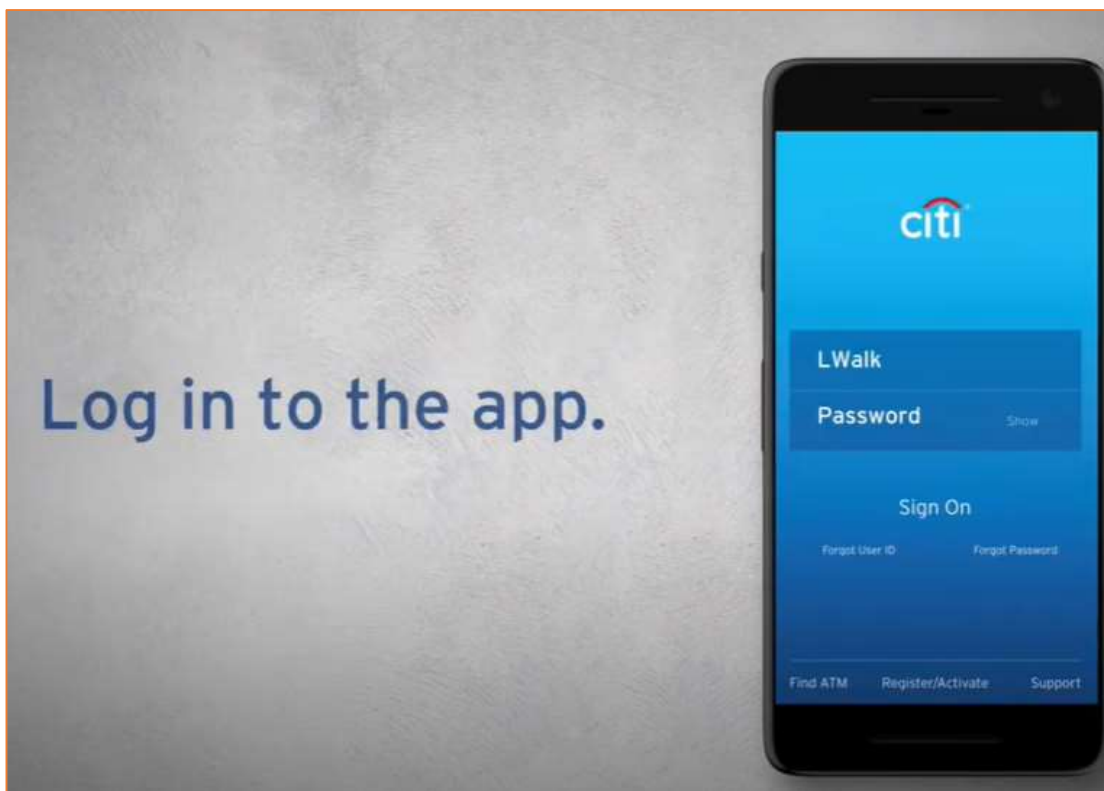
See id.

137. On information and belief, when Citibank's customers used one or more components of the Citibank Products and Services and Citibank System, they practiced a method of protecting a payment instrument used in transactions, comprising the step of blocking (*i.e.*, "Quick Locking" a debit or credit card) the authorization for a payment instrument, on a default basis, by the issuing entity.



See, e.g., <https://www.youtube.com/watch?v=xqqUmfDq62Q>.

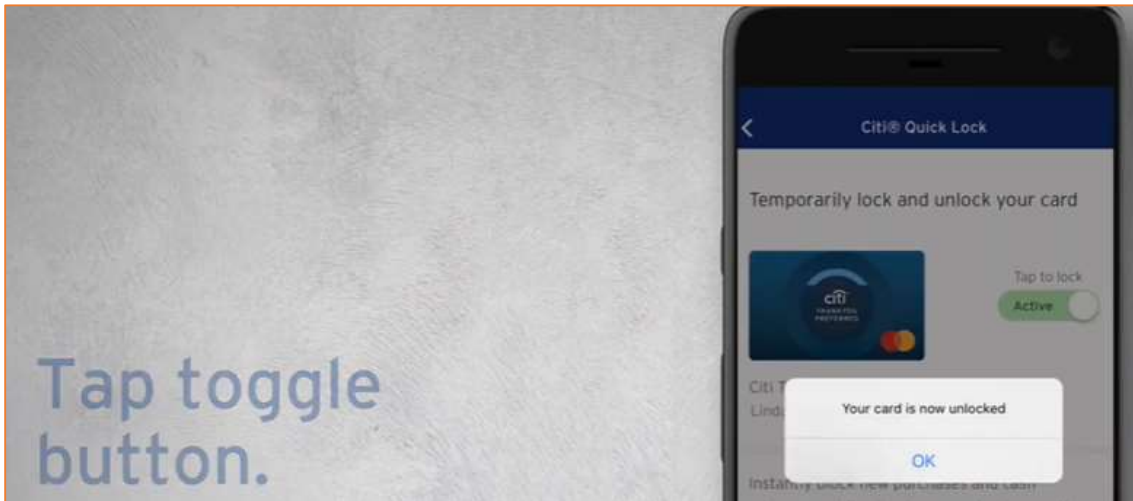
138. On information and belief, when Citibank's customers used one or more components of the Citibank Products and Services and Citibank System, they practiced a method of protecting a payment instrument used in transactions, comprising the step of communicating by the authorized instrument holder, prior to a transaction or multiple transactions, with an authentication function to subject the authorized instrument holder to authentication and to request that the payment instrument be unblocked (i.e., unlocking the previous "Quick Locked" debit or credit card) for future payment authorizations.



See, e.g., <https://www.youtube.com/watch?v=xqqUmfDq62Q>.

139. On information and belief, when Citibank's customers used one or more components of the Citibank Products and Services and Citibank System, they practiced a method of protecting a payment instrument used in transactions, comprising the step of authenticating the authorized instrument holder, and if the

authentication result is positive, causing the issuing entity to store the request to unblock the payment instrument for the authorization of payments for the transaction or transactions.



See, e.g., <https://www.youtube.com/watch?v=xqqUmfDq62Q>.

140. On information and belief, Citibank instructed customers to use the Citibank Products and Services and Citibank System, without limitation, through Citibank's website, which provides support for using the Citibank Products and Services and Citibank System.

141. On information and belief, Citibank directly infringed at least claims 6 and 8 of the '382 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Citibank Products and Services; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Citibank System.

142. On information and belief, Citibank has been on notice of the '382 patent since at least as early as the May 2020 Notice Letter and/or the August 2020 Notice Letter concerning its infringement of the Patents-in-Suit.

143. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter, Citibank knowingly encouraged its customers to directly infringe one or more claims of the '382 patent, including by Citibank's actions that include, without limitation, instructing and encouraging its customers to use the Citibank Products and Services and the Citibank System, including but not limited to the examples cited above.

144. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter regarding the Patents-in-Suit, Citibank knew the acts it induced its customers to take constituted patent infringement and Citibank's encouraging acts resulted in direct infringement of one or more claims of the '382 patent by its customers.

145. On information and belief, Citibank instructed and continues to instruct customers to use the Citibank Products and Services and the Citibank System, including, without limitation, through Citibank's website, which provides access to, and support for therefore.

146. On information and belief, Citibank's customers directly infringed at least claims 6 and 8 of the '382 patent through their use of the Citibank Products and Services and the Citibank System.

147. On information and belief, Citibank is in violation of 35 U.S.C. § 271(b) and has, at least since its May and/or August 2020 knowledge of the '382 patent, indirectly infringed at least claims 6 and 8 of the '382 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Citibank's customers) and possessing specific intent to encourage

infringement by Citibank's users of the Citibank Products and Services and the Citibank System. The components of the Citibank Products and Services and the Citibank System are specifically configured to function in accordance with the '382 patent claims and are material parts of the invention.

148. Citibank's direct and indirect infringement has damaged Kioba and caused it to suffer damages.

Count V - Infringement of United States Patent No. 7,107,078

149. Kioba repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

150. On information and belief, Citibank has violated 35 U.S.C. § 271(a) and (b) with respect to one or more claims of the '078 patent.

151. On information and belief, Citibank (or those acting on its behalf) (i) made, used, sold, imported and/or offered to sell the Citibank Products and Services; (ii) made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Citibank System; and (iii) induced its customers to use the Citibank Products and Services and the Citibank System, in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 1 of the '078 patent.

152. On information and belief, one or more components of the Citibank Products and Services and Citibank System employed and provided a method for effecting user payment for a purchase by means of a mobile station of the user, (e.g., a laptop, tablet, smartphone, or a PC, etc.) in a telecommunication system that includes a telephone network to which the mobile station is connected via a wireless

communication link, a network application connected to the telephone network and a mobile station application.

Citibank® Online
Get started with Online Bill Payment

Once signed on, from your home page click on the **Payments** tab. Then click **Add a New Payee**.

Choose either **Credit Card**, **Other type of business**, or **Pay an Individual**. Select a category. Enter the requested information and click **Next**.

If your payee is in our Merchant Directory, their information will appear automatically. Click **Next** to add this payee to your list.

To make a payment, click **One-Time Payment** in the Payments tab. Then select the payee you want to pay.

Choose the account you want to make your payment from. Enter the amount and date you want the payment made. Then click **Next**.

Double-check your entry and confirm your payment by clicking **OK**, and your done!

- **Make one-time & express payments**
Schedule payments from the next day up to one year in advance. Pay multiple bills at once.
- **Set up recurring payments**
Pay ongoing bills so you don't have to remember each time they're due.
- **Receive account alerts**
Be notified of important account activity, such as payments due, low balances and deposits cleared.
- **View your payee spending report**
See how much you've spent on each payee.
- **Pay other people**
Send electronic payments using an email address or bank account/routing number.

Citibank's Online Bill Payment Promise¹

Sent On Time, Every Time. Online bill payments are sent within 24 hours of the date you specified or on the next business day. If we don't make a payment according to your instructions, we'll resolve any late fees or finance charges that you may incur.²

No hidden charges. That's right—Citibank's online bill payment service is free no matter how many bills you pay and regardless of whether you make one-time or recurring payments.

Support 24/7. Report a bill payment problem online and get a fast response. Or speak directly with Customer Service 24 hours a day, seven days a week.

¹Applies only to payments made from Citibank checking accounts.

²This assumes that you have properly completed the bill payment instructions. For example, you must schedule payments processed electronically at least two business days in advance; for payments processed by check, 5-7 business days notice is required. If you want to cancel an online bill payment, you must do so by 11:59 pm ET prior to the date the payment is scheduled to be made.

bill payment
citibank
promise
online

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See e.g.,

https://online.citi.com/JRS/popups/remotebanking/CBOL_Online_Bill_Pay_QSG.pdf.

153. On information and belief, one or more components of the Citibank Products and Services and Citibank System employed and provided a method comprising the steps of generating and storing in the network application a user profile comprising user-specific information about alternative means of payment employable by the user.

Citibank® Online

Get started with Online Bill Payment

Once signed on, from your home page click on the **Payments** tab. Then click **Add a New Payee**.

Choose either **Credit Card**, **Other type of business**, or **Pay an Individual**. Select a category. Enter the requested information and click **Next**.

If your payee is in our Merchant Directory, their information will appear automatically. Click **Next** to add this payee to your list.

To make a payment, click **One-Time Payment** in the Payments tab. Then select the payee you want to pay.

Choose the account you want to make your payment from. Enter the amount and date you want the payment made. Then click **Next**.

Double-check your entry and confirm your payment by clicking **OK**, and your done!


- **Make one-time & express payments**
Schedule payments from the next day up to one year in advance. Pay multiple bills at once.
- **Set up recurring payments**
Pay ongoing bills so you don't have to remember each time they're due.
- **Receive account alerts**
Be notified of important account activity, such as payments due, low balances and deposits cleared.
- **View your payee spending report**
See how much you've spent on each payee.
- **Pay other people**
Send electronic payments using an email address or bank account/routing number.

Citibank's Online Bill Payment Promise¹

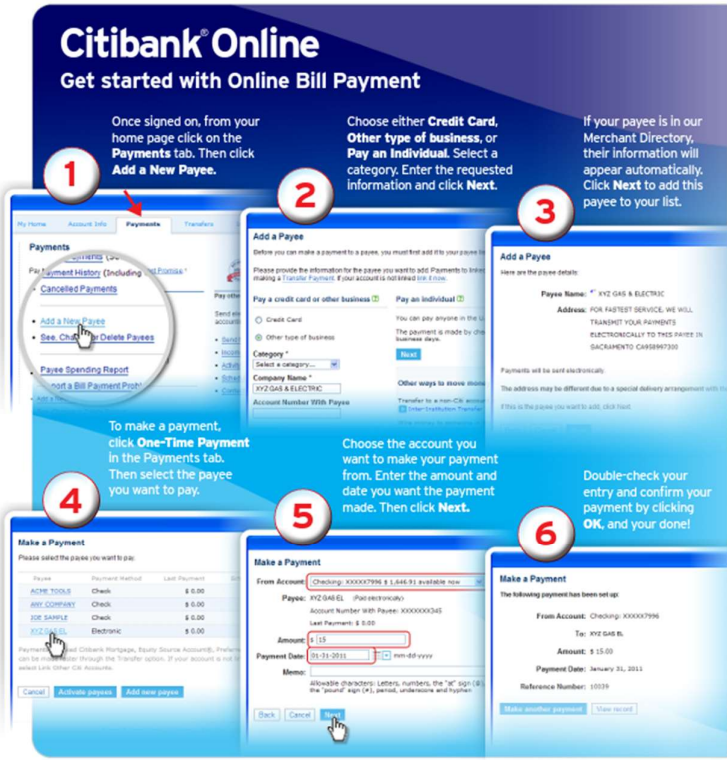
Sent On Time, Every Time. Online bill payments are sent within 24 hours of the date you specified or on the next business day. If we don't make a payment according to your instructions, we'll resolve any late fees or finance charges that you may incur.²

No hidden charges. That's right—Citibank's online bill payment service is free no matter how many bills you pay and regardless of whether you make one-time or recurring payments.

Support 24/7. Report a bill payment problem online and get a fast response. Or speak directly with Customer Service 24 hours a day, seven days a week.



¹Applies only to payments made from Citibank checking accounts.
²This assumes that you have properly completed the bill payment instructions. For example, you must schedule payments processed electronically at least two business days in advance; for payments processed by check, 5-7 business days notice is required. If you want to cancel an online bill payment, you must do so by 11:59 pm ET prior to the date the payment is scheduled to be made.



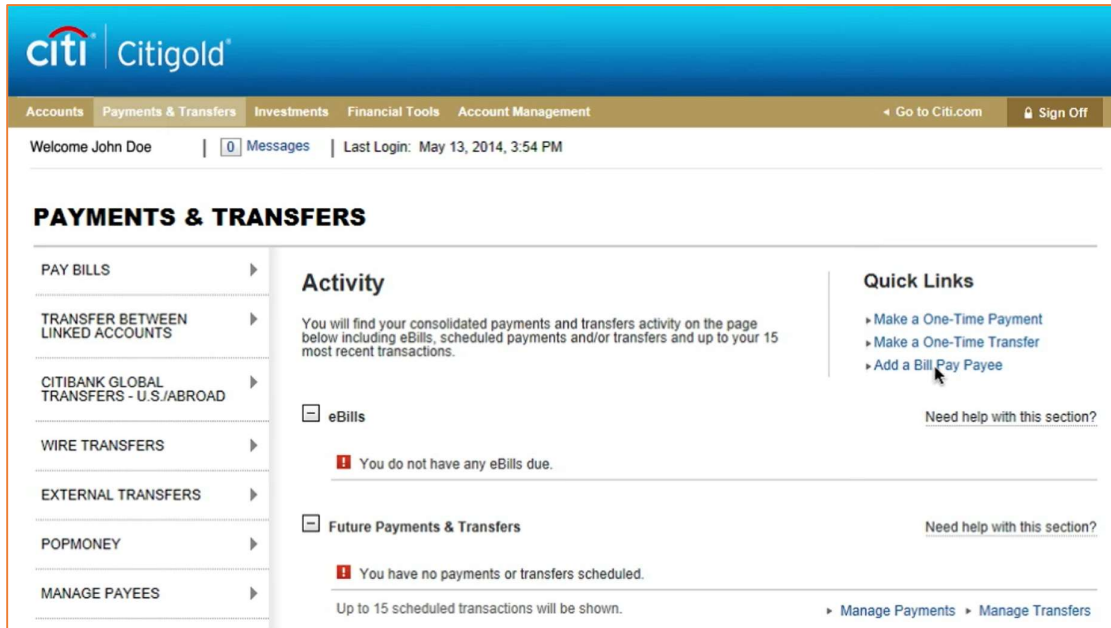
The screenshots show the following steps:

- Clicking on the 'Payments' tab and 'Add a New Payee'.
- Choosing a payee type (Credit Card, Other type of business, or Pay an Individual) and clicking 'Next'.
- Entering payee information (Payee Name, Address, etc.) and clicking 'Next'.
- Clicking 'One-Time Payment' and selecting a payee from a list.
- Entering the payment amount, date, and account information, then clicking 'Next'.
- Reviewing the payment details and clicking 'OK' to complete the payment.

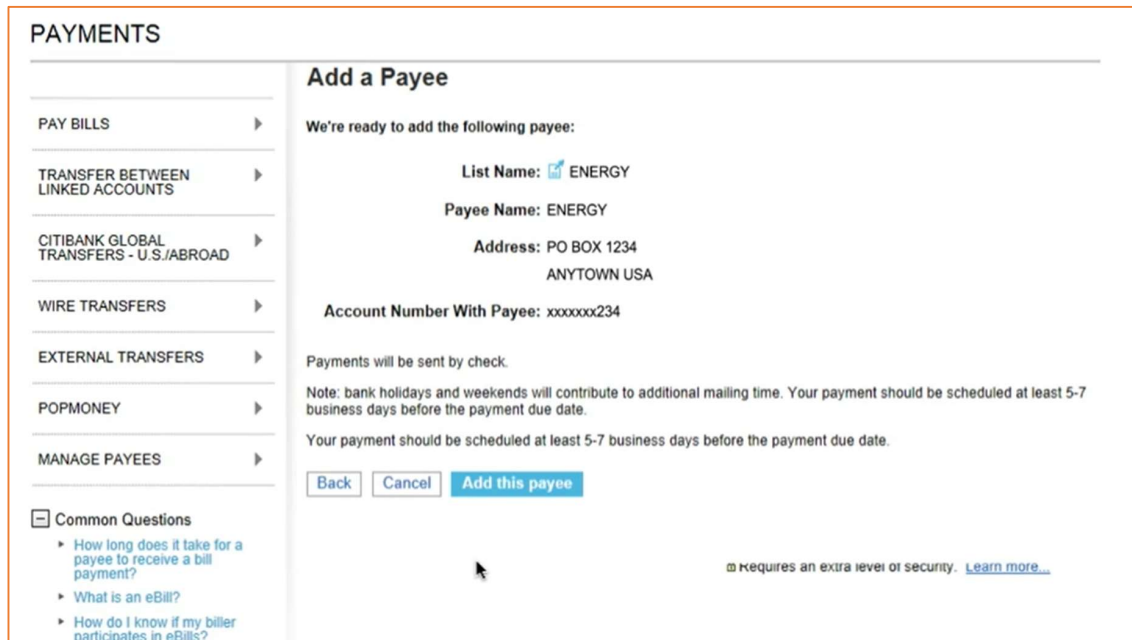
The trademarks, service marks, and company names used herein are the property of their respective owners. Deposit accounts are offered by Citibank N.A. Member FDIC. Citi credit cards are issued by Citibank (South Dakota), N.A. Citi, Citibank with Arc Design, and ThankYou are registered service marks of Citigroup Inc., and Citi Mobile is a service mark of Citigroup Inc.

See e.g.,

https://online.citi.com/JRS/popups/remotebanking/CBOL_Online_Bill_Pay_QSG.pdf.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

154. On information and belief, one or more components of the Citibank Products and Services and Citibank System employed and provided a method comprising the step of generating by means of the network application, when the mobile station user is to make a purchase payment, a mode of payment message

based on the user profile for transmission to the mobile station, the mode of payment message comprising a list of the alternative means of payment employable by the user.

PAYMENTS

Add a Payee

We're ready to add the following payee:

List Name: ENERGY

Payee Name: ENERGY

Address: PO BOX 1234
ANYTOWN USA

Account Number With Payee: xxxxxx234

Payments will be sent by check.

Note: bank holidays and weekends will contribute to additional mailing time. Your payment should be scheduled at least 5-7 business days before the payment due date.

Your payment should be scheduled at least 5-7 business days before the payment due date.

[Back](#) [Cancel](#) [Add this payee](#)

Common Questions

- How long does it take for a payee to receive a bill payment?
- What is an eBill?
- How do I know if my biller participates in eBills?

Requires an extra level of security. [Learn more...](#)

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

PAYMENTS

Make a Payment

Now you can use your ThankYou* Points toward your bill payments with our Online Bill Pay With Points feature. [Learn more](#)
ThankYou Points cannot be used for bill payments toward any accounts with Citibank or a Citibank affiliate or for express or recurring payments.

Payee	Payment Method	Last Payment	Scheduled Payments
ENERGY	Check		

[Cancel](#) [Add new payee](#)

Common Questions

- How long does it take for a payee to receive a bill payment?
- When are online bill payments deducted from my account?

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

PAYMENTS

Make a Payment

From Account: Interest Checking: 2303 \$ 1,892.46 available now

Payee: ENERGY (Paid by check)
 Account Number With Payee: XXXXXX234
 Last Payment: \$ 0.00

Amount: \$ 250.00

Set Payment Date: 05-14-2014 mm-dd-yyyy

Memo:
 Allowable characters: Letters, numbers, the "at" sign (@), the "pound" sign (#), period, underscore and hyphen

Note: bank holidays and weekends will contribute to additional mailing time.

Common Questions

- How long does it take for a payee to receive a bill payment?
- When are online bill payments deducted from my account?

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

155. On information and belief, one or more components of the Citibank Products and Services and Citibank System employed and provided a method comprising the step of presenting, on the mobile station, the list of the alternative means of payment for selection by the user.

PAYMENTS

Add a Payee

We're ready to add the following payee:

List Name: ENERGY
Payee Name: ENERGY
Address: PO BOX 1234
 ANYTOWN USA

Account Number With Payee: xxxxxx234

Payments will be sent by check.

Note: bank holidays and weekends will contribute to additional mailing time. Your payment should be scheduled at least 5-7 business days before the payment due date.

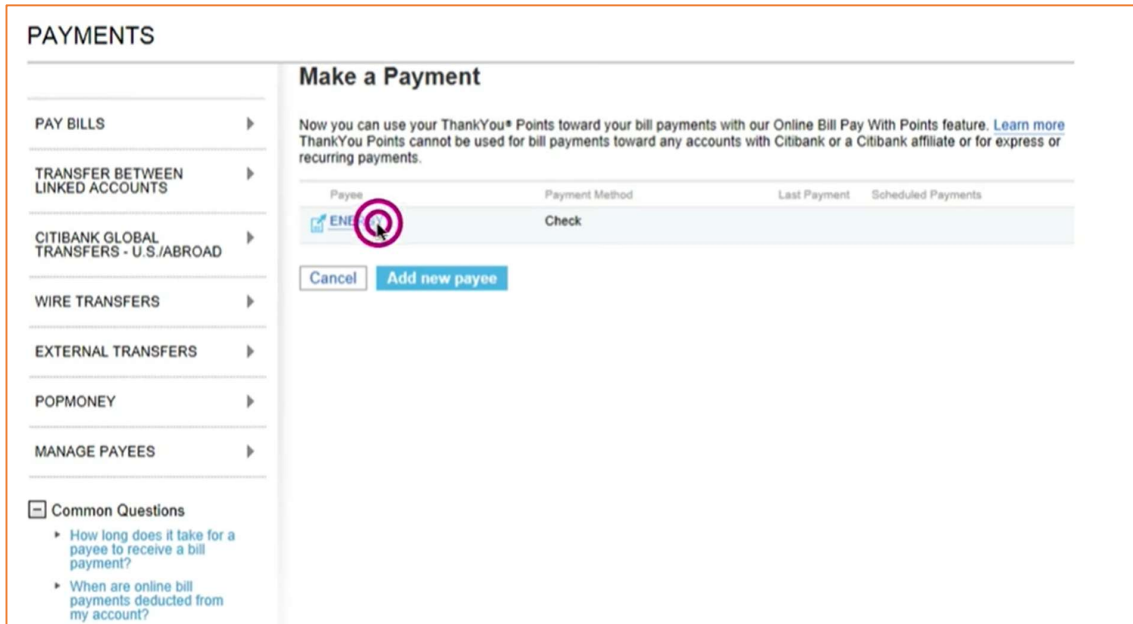
Your payment should be scheduled at least 5-7 business days before the payment due date.

Common Questions

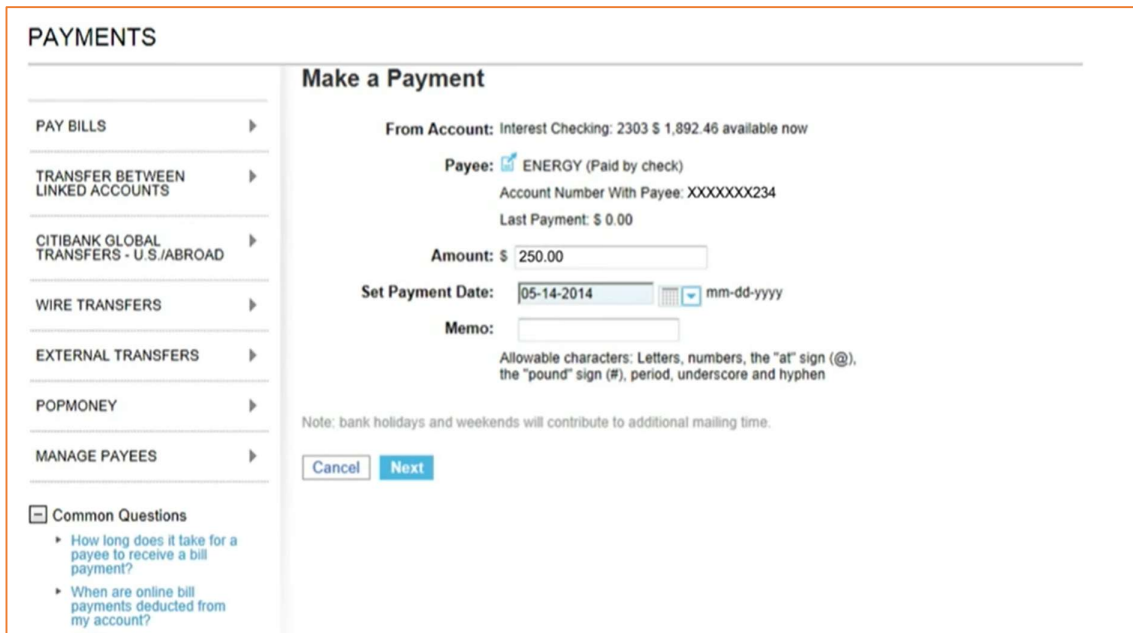
- How long does it take for a payee to receive a bill payment?
- What is an eBill?
- How do I know if my biller participates in eBills?

Requires an extra level of security. [Learn more...](#)

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

156. On information and belief, one or more components of the Citibank Products and Services and Citibank System employed and provided a method comprising the step of generating a response message based on user input in

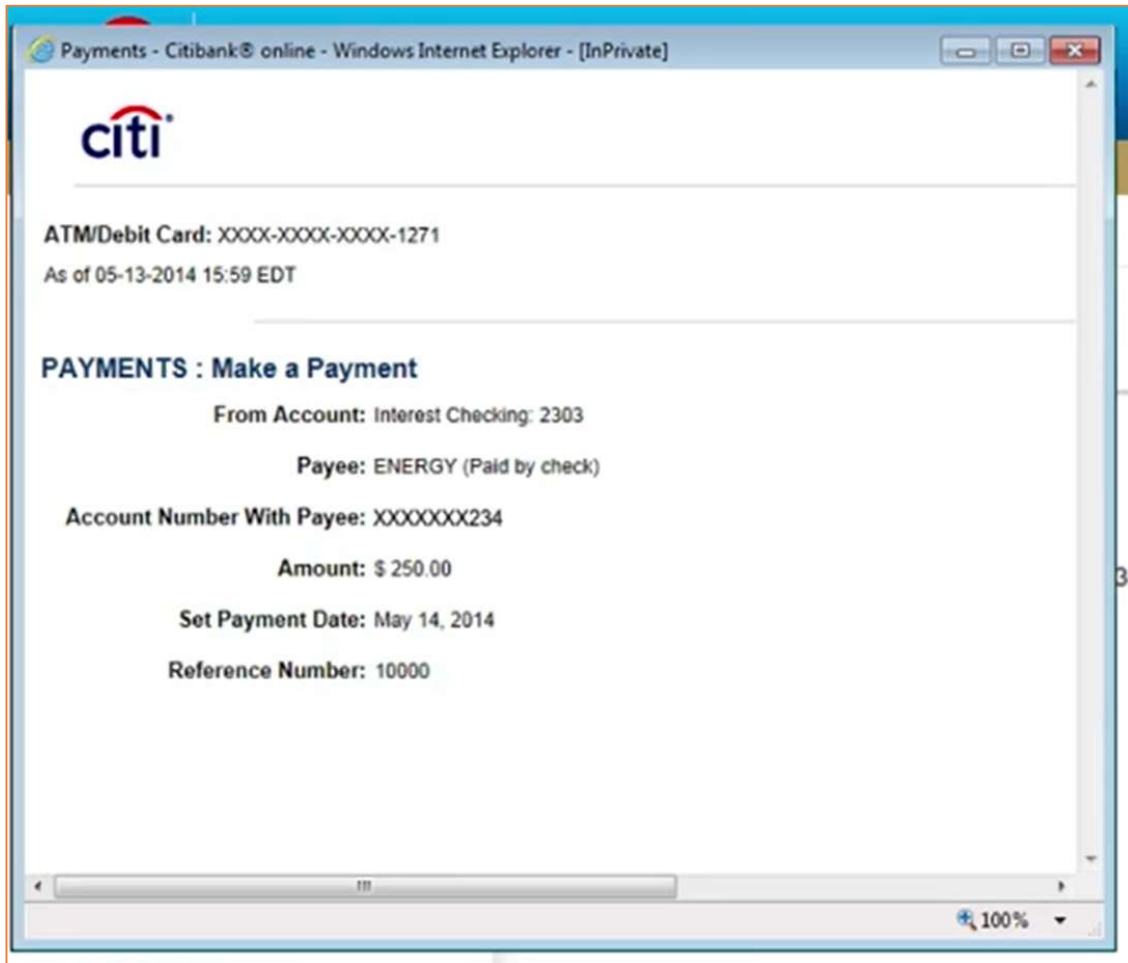
response to the presented list of alternative means of payment and sending the response message to the network application, the response message indicating a means of payment selected by the user from the presented list of alternative means of payment.

The screenshot shows a web interface titled "PAYMENTS" with a sidebar menu on the left containing options like "PAY BILLS", "TRANSFER BETWEEN LINKED ACCOUNTS", "CITIBANK GLOBAL TRANSFERS - U.S./ABROAD", "WIRE TRANSFERS", "EXTERNAL TRANSFERS", "POPMONEY", and "MANAGE PAYEES". The main content area is titled "Make a Payment" and includes a notice about using ThankYou Points. Below the notice is a table with columns for "Payee", "Payment Method", "Last Payment", and "Scheduled Payments". The first row shows "ENERGY" as the payee and "Check" as the payment method. A red circle highlights the "ENERGY" payee. Below the table are "Cancel" and "Add new payee" buttons.

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

This screenshot shows the "Make a Payment" interface with detailed information. It displays the "From Account" as "Interest Checking: 2303 \$ 1,892.46 available now". The "Payee" is "ENERGY (Paid by check)" with an account number "XXXXXX234" and a "Last Payment" of "\$ 0.00". The "Amount" is set to "\$ 250.00" in a text input field. The "Set Payment Date" is "05-14-2014" in a date picker. There is a "Memo" field and a note about allowable characters: "Letters, numbers, the 'at' sign (@), the 'pound' sign (#), period, underscore and hyphen". A note at the bottom states "bank holidays and weekends will contribute to additional mailing time." "Cancel" and "Next" buttons are visible at the bottom.

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

157. On information and belief, Citibank directly infringed at least claim 1 of the '078 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Citibank Products and Services; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Citibank System.

158. On information and belief, Citibank has been on notice of the '078 patent since at least as early as the May 2020 Notice Letter and/or the August 2020 Notice Letter concerning its infringement of the Patents-in-Suit.

159. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter, Citibank knowingly encouraged its customers to directly infringe one or more claims of the '078 patent, including by Citibank's actions that include, without limitation, instructing and encouraging its customers to use the Citibank Products and Services and the Citibank System, including but not limited to the examples cited above.

160. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter regarding the Patents-in-Suit, Citibank knew the acts it induced its customers to take constituted patent infringement and Citibank's encouraging acts resulted in direct infringement of one or more claims of the '078 patent by its customers.

161. On information and belief, Citibank instructed and continues to instruct customers to use the Citibank Products and Services and the Citibank System, including, without limitation, through Citibank's website, which provides access to, and support for therefore.

162. On information and belief, Citibank's customers directly infringed at least claim 1 of the '078 patent through their use of the Citibank Products and Services and the Citibank System.

163. On information and belief, Citibank is in violation of 35 U.S.C. § 271(b) and has, at least since its May and/or August 2020 knowledge of the '078 patent, indirectly infringed at least claim 1 of the '078 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Citibank's customers) and possessing specific intent to encourage infringement by Citibank's

users of the Citibank Products and Services and the Citibank System. The components of the Citibank Products and Services and the Citibank System are specifically configured to function in accordance with the '078 patent claims and are material parts of the invention.

164. Citibank's direct and indirect infringement has damaged Kioba and caused it to suffer damages.

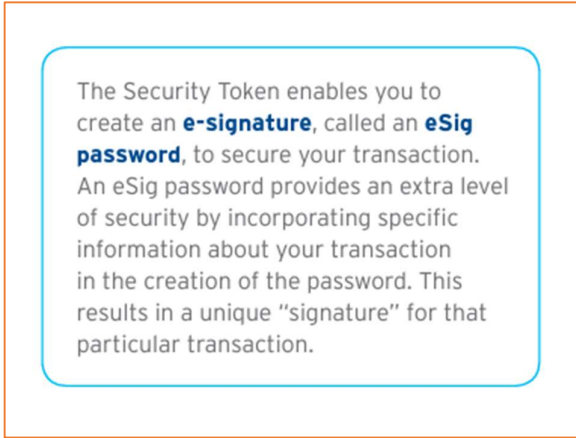
Count VI - Infringement of United States Patent No. 8,442,915

165. Kioba repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

166. On information and belief, Citibank has violated 35 U.S.C. § 271(a) and (b) with respect to one or more claims of the '915 patent.

167. On information and belief, Citibank (or those acting on its behalf) (i) made, used, sold, imported and/or offered to sell the Citibank Products and Services; (ii) made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Citibank System; and (iii) induced its customers to use the Citibank Products and Services and the Citibank System, in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 7 of the '915 patent.

168. On information and belief, one or more components of the Citibank System employed and provided a method comprising the step of receiving, at a host computer, (*e.g.*, a server) a first request for a transaction from a communications terminal, the first request comprising information of a customer to be authenticated and information identifying a parameter of the transaction.



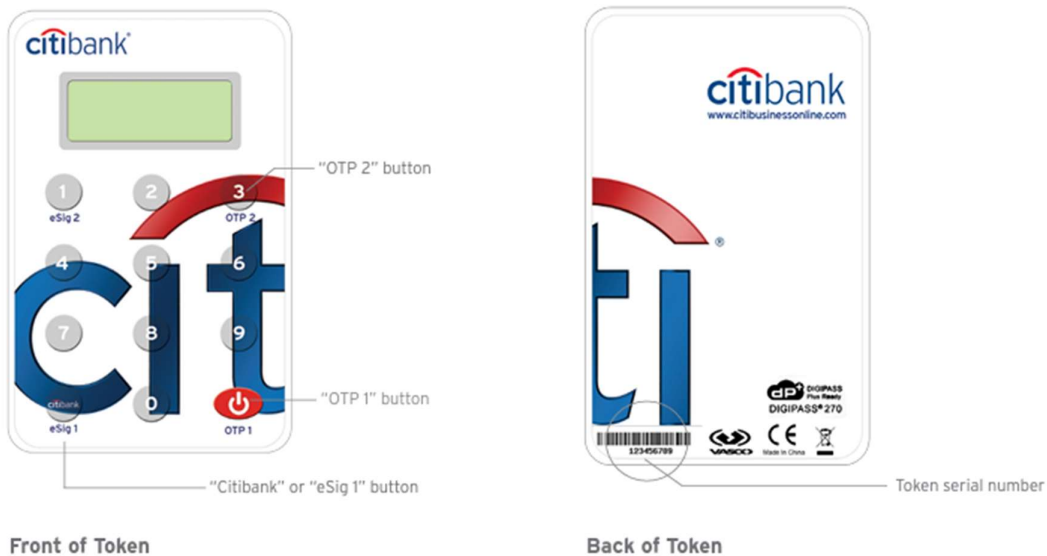
The Security Token enables you to create an **e-signature**, called an **eSig password**, to secure your transaction. An eSig password provides an extra level of security by incorporating specific information about your transaction in the creation of the password. This results in a unique "signature" for that particular transaction.

See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pdf>


f.

Your New CitiBusiness Online Security Token



Helpful Tips

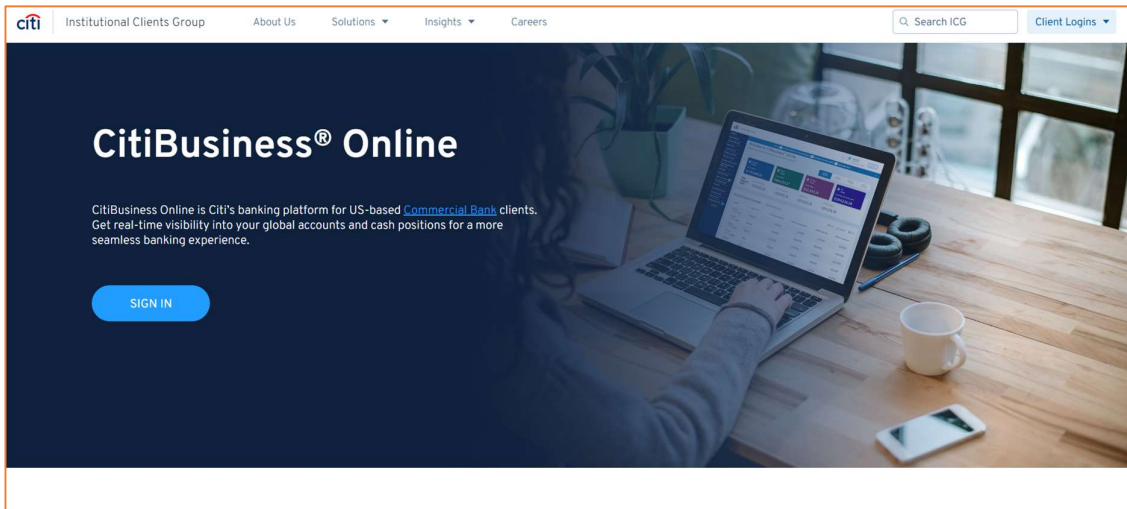
Your new Token generates One-Time Passwords (OTP) that are valid for only a short period of time. CitiBusiness Online uses these passwords to authenticate you and to help ensure that unauthorized transactions are not processed from your accounts.

- **Token Function Buttons:** Three function buttons are used to generate Token passwords. You don't need to power on the Token before pressing the function button. The function buttons will power the Token on.
 - > Use **OTP 1** for sign on
 - > Use **eSig 1** for wire initiation, when required
 - > Use **OTP 2** for wire approval
- Press the red **OTP 1** button to backspace if you need to re-enter information or turn off the token.
- If you need online help, click the **Green '?'**  for more information. The help page will guide you step-by-step.

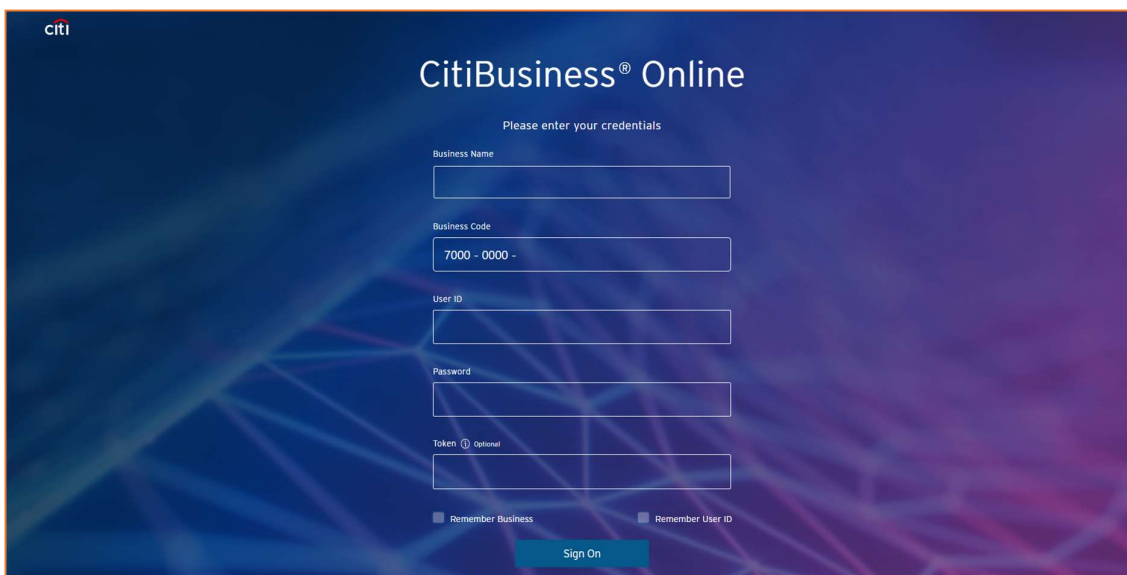
See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pdf>

f.

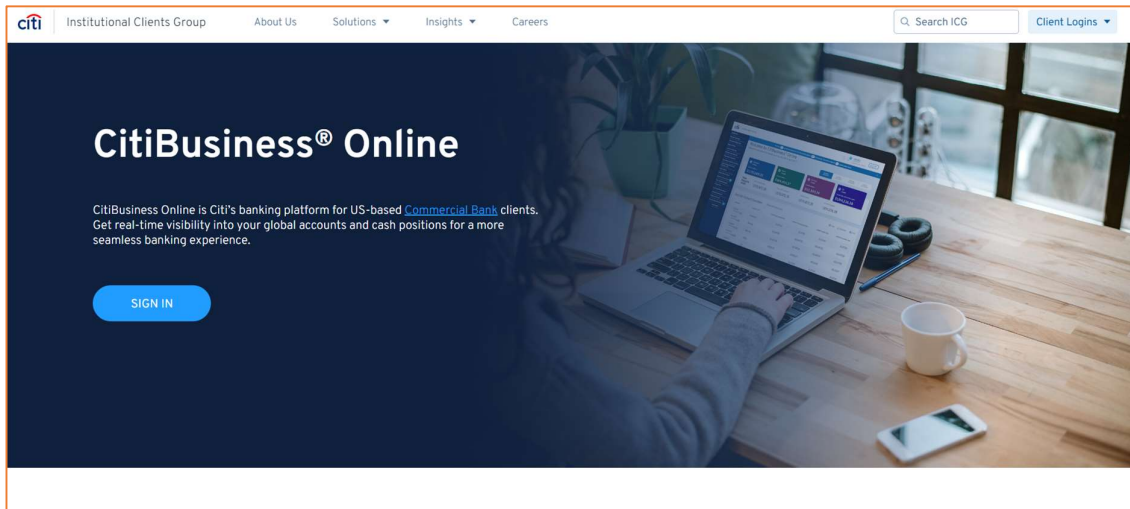


See e.g., <https://icg.citi.com/icghome/what-we-do/citi-business-online>.



See e.g., <https://businessaccess.citibank.citigroup.com/cbusol/ang/#/login>.

169. On information and belief, one or more components of the Citibank System employ and provide a method comprising the step of setting an authentication level based on the parameter of the transaction.



See e.g., <https://icg.citi.com/icghome/what-we-do/citi-business-online>.

Registering Your New Token

1. Go to CitiBusiness Online:
www.citibusinessonline.com
2. Click the Green '**Sign-on**' Button. From the dropdown menu, select '**New User**', then click '**Enter**'.
3. Before your first sign on, you should have called Customer Service to obtain your Business Code and User ID. Enter into the fields:
 - > Business Name
 - > Last 8-digits of your Business Code
 - > User ID; check '**Save on this computer**'
 - > Temporary Password
4. Leave the 'Token' field blank.
5. Then click '**Sign On**'.
6. Review the User Agreement, then click '**Accept**'.
7. Select a new password and enter security information.
8. Click '**Sign On**'.

Now it's time to register your Token.

9. **Enter the 10-digit serial number** found on the back of your Token.
10. Press and hold the red **OTP 1** button.
11. A **6-digit password** will appear in the Token display. **Enter the 6-digit password** into the 'OTP 1 Token password' field.
12. Click '**Submit**'.



You will now be at the CitiBusiness Online Main Menu and can access your account information.


See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pd>

f.

170. On information and belief, one or more components of the Citibank System employed and provided a method comprising the step of transmitting, from the host computer, a second request for identification information of the customer to a mobile communications device of the customer.

Signing On With Your New Token

1. Go to CitiBusiness Online:
www.citibusinessonline.com
2. If you checked the 'Save on this computer' box previously, your User ID will be prefilled. **If not, just enter your User ID and Password.**
3. To generate a Token password, press and hold the red **OTP 1** button.
4. A **6-digit password** will appear in the Token display. **Enter the 6-digit password** into the 'Token' field.
5. Click '**Sign On**'.

See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pd>

f.

Initiating Wire Transfer

Depending on the user and transaction-type, you may be required to enter a Token-generated password to complete your transaction.

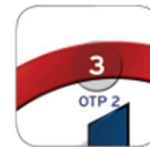
1. Press and hold the Citibank or **eSig 1** button until a dash displays.
2. Enter the **last 6-digits of the Beneficiary's Account Number*** into the Token keypad. (Enter zeros where spaces, dashes, or non-numeric characters appear in the account number; if less than 6 digits add leading zeros).
3. Press the Citibank or **eSig 1** button again.
4. A **6-digit password** will appear in Token display. **Enter the 6-digit password** into the 'Token' field.
5. Click **'Send Wire'**.



Approving Wire Transfers

It is good business practice to require both a 'maker' (a wire initiator) and a 'checker' (a wire approver) to submit and approve a wire transfer. Follow these steps to approve wires when dual controls are in place.

1. To select wires for approval, check off the boxes on the far left in the Approval queue.
2. When all desired wires are selected, click the radio dial to **'Approve the Requested Action for all checked items'**.
3. Then, enter your **'static' password**.
4. Press and hold the **OTP 2** button.
5. A **6-digit password** will appear in Token display. **Enter the 6-digit password** into the 'Token' field.
6. Click **'Submit'**.



See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pdf>

171. On information and belief, one or more components of the Citibank System employed and provided a method comprising the step of receiving, at the host computer, the identification information from the mobile communications device in response to the second request.



Signing On With Your New Token

1. Go to CitiBusiness Online:
www.citibusinessonline.com
2. If you checked the 'Save on this computer' box previously, your User ID will be prefilled. **If not, just enter your User ID and Password.**
3. To generate a Token password, press and hold the red **OTP 1** button. 
4. A **6-digit password** will appear in the Token display. **Enter the 6-digit password** into the 'Token' field.
5. Click **'Sign On'**.

See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pdf>

f.

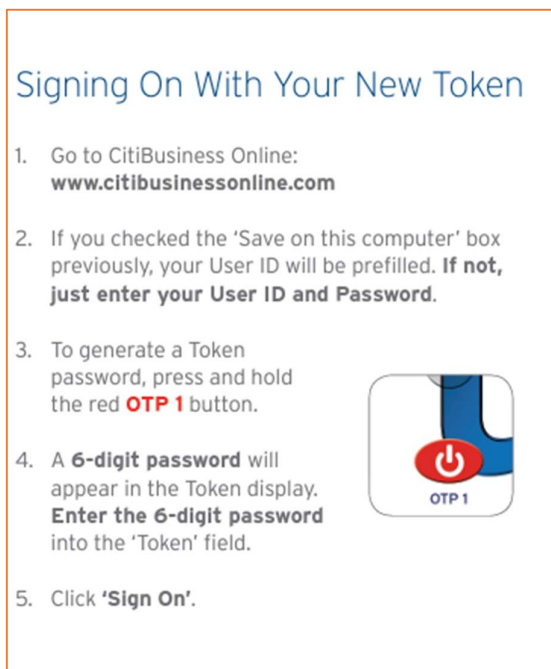
Initiating Wire Transfer	Approving Wire Transfers
<p>Depending on the user and transaction-type, you may be required to enter a Token-generated password to complete your transaction.</p>	<p>It is good business practice to require both a 'maker' (a wire initiator) and a 'checker' (a wire approver) to submit and approve a wire transfer. Follow these steps to approve wires when dual controls are in place.</p>
<ol style="list-style-type: none"> 1. Press and hold the Citibank or eSig 1 button until a dash displays. 2. Enter the last 6-digits of the Beneficiary's Account Number* into the Token keypad. (Enter zeros where spaces, dashes, or non-numeric characters appear in the account number; if less than 6 digits add leading zeros). 	<ol style="list-style-type: none"> 1. To select wires for approval, check off the boxes on the far left in the Approval queue. 2. When all desired wires are selected, click the radio dial to 'Approve the Requested Action for all checked items'.
<ol style="list-style-type: none"> 3. Press the Citibank or eSig 1 button again.  4. A 6-digit password will appear in Token display. Enter the 6-digit password into the 'Token' field. 	<ol style="list-style-type: none"> 3. Then, enter your 'static' password. 4. Press and hold the OTP 2 button. 5. A 6-digit password will appear in Token display. Enter the 6-digit password into the 'Token' field. 
<ol style="list-style-type: none"> 5. Click 'Send Wire'. 	<ol style="list-style-type: none"> 6. Click 'Submit'.

See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pd>

f.

172. On information and belief, one or more components of the Citibank System employed and provided a method comprising the step of generating authentication information at the host computer.



See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pd>

f.

Initiating Wire Transfer

Depending on the user and transaction-type, you may be required to enter a Token-generated password to complete your transaction.

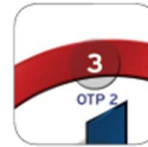
1. Press and hold the Citibank or **eSig 1** button until a dash displays.
2. Enter the **last 6-digits of the Beneficiary's Account Number*** into the Token keypad. (Enter zeros where spaces, dashes, or non-numeric characters appear in the account number; if less than 6 digits add leading zeros).
3. Press the Citibank or **eSig 1** button again.
4. A **6-digit password** will appear in Token display. **Enter the 6-digit password** into the 'Token' field.
5. Click **'Send Wire'**.



Approving Wire Transfers

It is good business practice to require both a 'maker' (a wire initiator) and a 'checker' (a wire approver) to submit and approve a wire transfer. Follow these steps to approve wires when dual controls are in place.

1. To select wires for approval, check off the boxes on the far left in the Approval queue.
2. When all desired wires are selected, click the radio dial to **'Approve the Requested Action for all checked items'**.
3. Then, enter your **'static' password**.
4. Press and hold the **OTP 2** button.
5. A **6-digit password** will appear in Token display. **Enter the 6-digit password** into the 'Token' field.
6. Click **'Submit'**.



See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pdf>

173. On information and belief, one or more components of the Citibank System employed and provided a method comprising the step of transmitting, from the host computer, the authentication information to the communications terminal in response to the first request.

citi

CitiBusiness® Online

Please enter your credentials

Business Name

Business Code

7000 - 0000 -

User ID

Password

Token Optional


Remember Business Remember User ID

Sign On

See e.g., <https://businessaccess.citibank.citigroup.com/cbusol/ang/#/login>.

Signing On With Your New Token

1. Go to CitiBusiness Online:
www.citibusinessonline.com
2. If you checked the 'Save on this computer' box previously, your User ID will be pre-filled. **If not, just enter your User ID and Password.**
3. To generate a Token password, press and hold the red **OTP 1** button.
4. A **6-digit password** will appear in the Token display. **Enter the 6-digit password** into the 'Token' field.
5. Click **'Sign On'**.



See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pdf>

f.

Initiating Wire Transfer

Depending on the user and transaction-type, you may be required to enter a Token-generated password to complete your transaction.

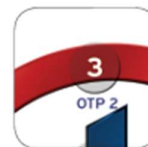
1. Press and hold the Citibank or **eSig 1** button until a dash displays.
2. Enter the **last 6-digits of the Beneficiary's Account Number*** into the Token keypad. (Enter zeros where spaces, dashes, or non-numeric characters appear in the account number; if less than 6 digits add leading zeros).
3. Press the Citibank or **eSig 1** button again.
4. A **6-digit password** will appear in Token display. **Enter the 6-digit password** into the 'Token' field.
5. Click **'Send Wire'**.



Approving Wire Transfers

It is good business practice to require both a 'maker' (a wire initiator) and a 'checker' (a wire approver) to submit and approve a wire transfer. Follow these steps to approve wires when dual controls are in place.

1. To select wires for approval, check off the boxes on the far left in the Approval queue.
2. When all desired wires are selected, click the radio dial to **'Approve the Requested Action for all checked items'**.
3. Then, enter your **'static' password**.
4. Press and hold the **OTP 2** button.
5. A **6-digit password** will appear in Token display. **Enter the 6-digit password** into the 'Token' field.
6. Click **'Submit'**.



See e.g.,

<https://businessaccess.citibank.citigroup.com/basprod/citiiwt/images/tokenug.pdf>

174. On information and belief, Citibank directly infringed at least claim 7 of the '915 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Citibank Products and Services; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Citibank System.

175. On information and belief, Citibank has been on notice of the '915 patent since at least as early as the May 2020 Notice Letter and/or the August 2020 Notice Letter concerning its infringement of the Patents-in-Suit.

176. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter, Citibank knowingly encouraged its customers

to directly infringe one or more claims of the '915 patent, including by Citibank's actions that include, without limitation, instructing and encouraging its customers to use the Citibank Products and Services and the Citibank System, including but not limited to the examples cited above.

177. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter regarding the Patents-in-Suit, Citibank knew the acts it induced its customers to take constituted patent infringement and Citibank's encouraging acts resulted in direct infringement of one or more claims of the '915 patent by its customers.

178. On information and belief, Citibank instructed and continues to instruct customers to use the Citibank Products and Services and the Citibank System, including, without limitation, through Citibank's website, which provides access to, and support for therefore.

179. On information and belief, Citibank's customers directly infringed at least claim 7 of the '915 patent through their use of the Citibank Products and Services and the Citibank System.

180. On information and belief, Citibank is in violation of 35 U.S.C. § 271(b) and has, at least since its May and/or August 2020 knowledge of the '915 patent, indirectly infringed at least claim 7 of the '915 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Citibank's customers) and possessing specific intent to encourage infringement by Citibank's users of the Citibank Products and Services and the Citibank System. The components of the Citibank Products and Services and the Citibank System are

specifically configured to function in accordance with the '915 patent claims and are material parts of the invention.

181. Citibank's direct and indirect infringement has damaged Kioba and caused it to suffer damages..

Count VII - Infringement of United States Patent No. 9,471,888

182. Kioba repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

183. On information and belief, Citibank has violated 35 U.S.C. § 271(a) and (b) with respect to one or more claims of the '888 patent.

184. On information and belief, Citibank (or those acting on its behalf) (i) made, used, sold, imported and/or offered to sell the Citibank Products and Services; (ii) made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Citibank System; and (iii) induced its customers to use the Citibank Products and Services and the Citibank System, in the United States that infringe (literally and/or under the doctrine of equivalents) at least claim 6 of the '888 patent.

185. On information and belief, one or more components of the Citibank System employed and provided a method for utilizing a mobile station for the transmission of authorization information (*e.g.*, payment request for transfer funds, bill payments, etc.) in a telecommunication network. The Citibank System supports online banking for managing various banking needs via mobile station (*e.g.*, user's device).

Citibank® Online
Get started with Online Bill Payment

Once signed on, from your home page click on the **Payments** tab. Then click **Add a New Payee**.

Choose either **Credit Card**, **Other type of business**, or **Pay an Individual**. Select a category. Enter the requested information and click **Next**.

If your payee is in our Merchant Directory, their information will appear automatically. Click **Next** to add this payee to your list.

1 **Add a New Payee**

2 **Choose either Credit Card, Other type of business, or Pay an Individual**

3 **Add a Payee**

4 **Make a Payment**

5 **Make a Payment**

6 **Make a Payment**

- **Make one-time & express payments**
Schedule payments from the next day up to one year in advance. Pay multiple bills at once.
- **Set up recurring payments**
Pay ongoing bills so you don't have to remember each time they're due.
- **Receive account alerts**
Be notified of important account activity, such as payments due, low balances and deposits cleared.
- **View your payee spending report**
See how much you've spent on each payee.
- **Pay other people**
Send electronic payments using an email address or bank account/routing number.

Citibank's Online Bill Payment Promise¹

Sent On Time, Every Time. Online bill payments are sent within 24 hours of the date you specified or on the next business day. If we don't make a payment according to your instructions, we'll resolve any late fees or finance charges that you may incur.²

No hidden charges. That's right—Citibank's online bill payment service is free no matter how many bills you pay and regardless of whether you make one-time or recurring payments.

Support 24/7. Report a bill payment problem online and get a fast response. Or speak directly with Customer Service 24 hours a day, seven days a week.

¹Applies only to payments made from Citibank checking accounts.

²This assumes that you have properly completed the bill payment instructions. For example, you must schedule payments processed electronically at least two business days in advance; for payments processed by check, 5-7 business days notice is required. If you want to cancel an online bill payment, you must do so by 11:59 pm ET prior to the date the payment is scheduled to be made.

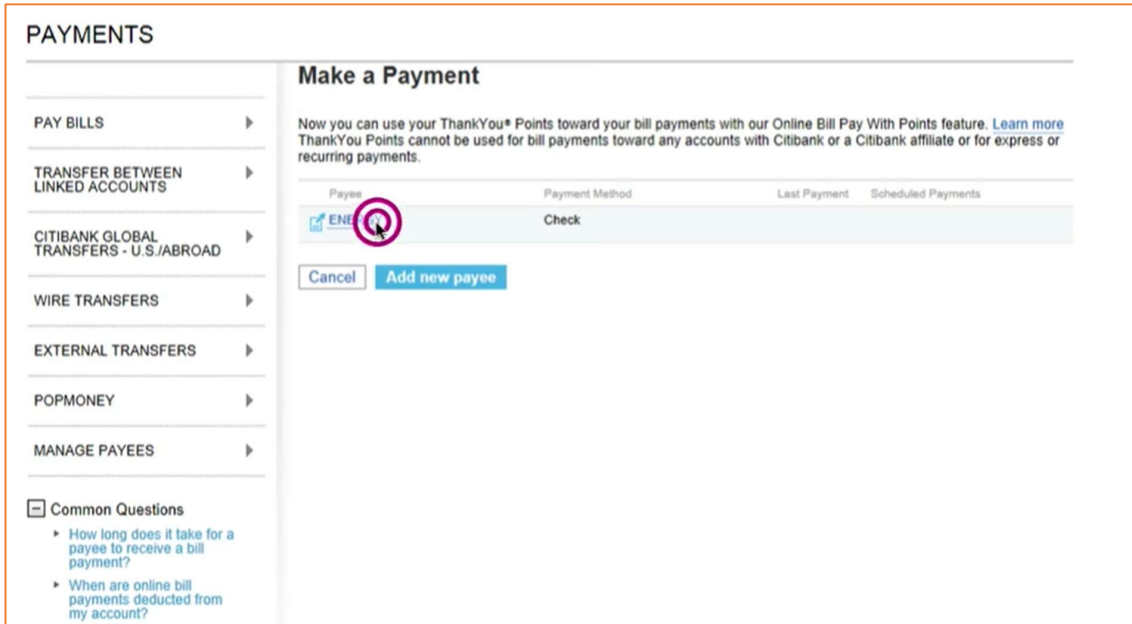
bill payment
citibank
Promise
Online

The trademarks, service marks, and company names used herein are the property of their respective owners. Deposit accounts are offered by Citibank N.A. Member FDIC. Citi credit cards are issued by Citibank (South Dakota), N.A. Citi, Citibank with Arc Design, and ThankYou are registered service marks of Citigroup Inc., and Citi Mobile is a service mark of Citigroup Inc.

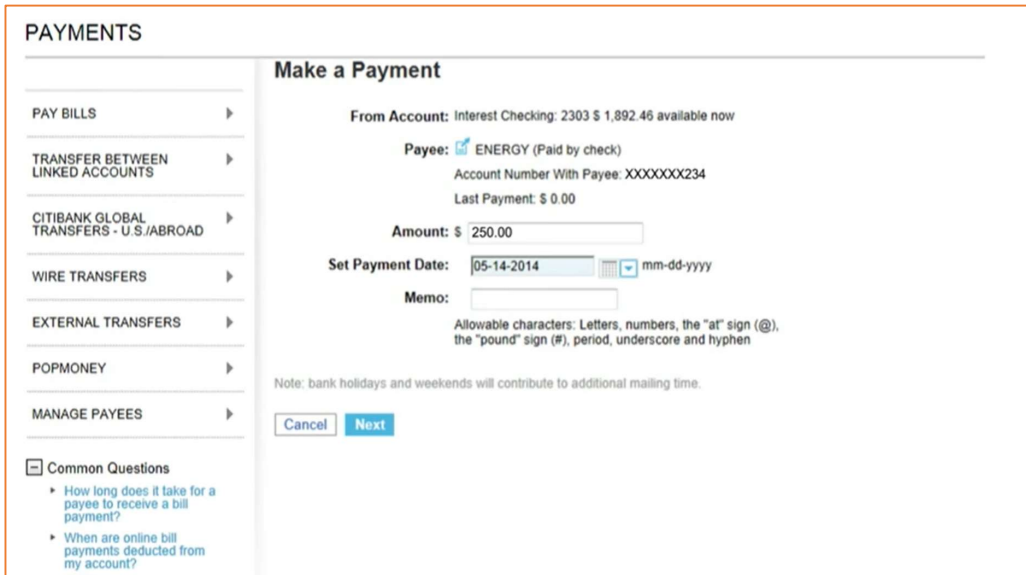
See e.g.,

https://online.citi.com/JRS/popups/remotebanking/CBOL_Online_Bill_Pay_QSG.pdf.

186. On information and belief, one or more components of the Citibank System employed and provided a method for receiving transaction information (e.g., payment request for transfer funds, bill payments, etc.) from a mobile station, (e.g., a smartphone using a Citibank mobile application or Citibank's website running on a PC) wherein the transaction information corresponds to a transaction to be verified (e.g., the transaction referenced in the screenshot below).



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

187. On information and belief, one or more components of the Citibank System employed and provided a method for communicating a request to verify the transaction to an authorization server (e.g., one or more of Citibank’s servers that support the mobile application or the website) based on the transaction information

received from the mobile station, wherein verification indicates a verification status of the transaction.

PAYMENTS

- PAY BILLS
- TRANSFER BETWEEN LINKED ACCOUNTS
- CITIBANK GLOBAL TRANSFERS - U.S./ABROAD
- WIRE TRANSFERS
- EXTERNAL TRANSFERS
- POPMONEY
- MANAGE PAYEES

Common Questions

- How long does it take for a payee to receive a bill payment?
- When are online bill payments deducted from my account?

Make a Payment

Now you can use your ThankYou® Points toward your bill payments with our Online Bill Pay With Points feature. [Learn more](#)
ThankYou Points cannot be used for bill payments toward any accounts with Citibank or a Citibank affiliate or for express or recurring payments.

Payee	Payment Method	Last Payment	Scheduled Payments
ENERGY	Check		

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

PAYMENTS

- PAY BILLS
- TRANSFER BETWEEN LINKED ACCOUNTS
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Common Questions

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- When are online bill payments deducted from my account?

Make a Payment

From Account: Interest Checking: 2303 \$ 1,892.46 available now

Payee: ENERGY (Paid by check)
Account Number With Payee: XXXXXX234
Last Payment: \$ 0.00

Amount: \$ 250.00

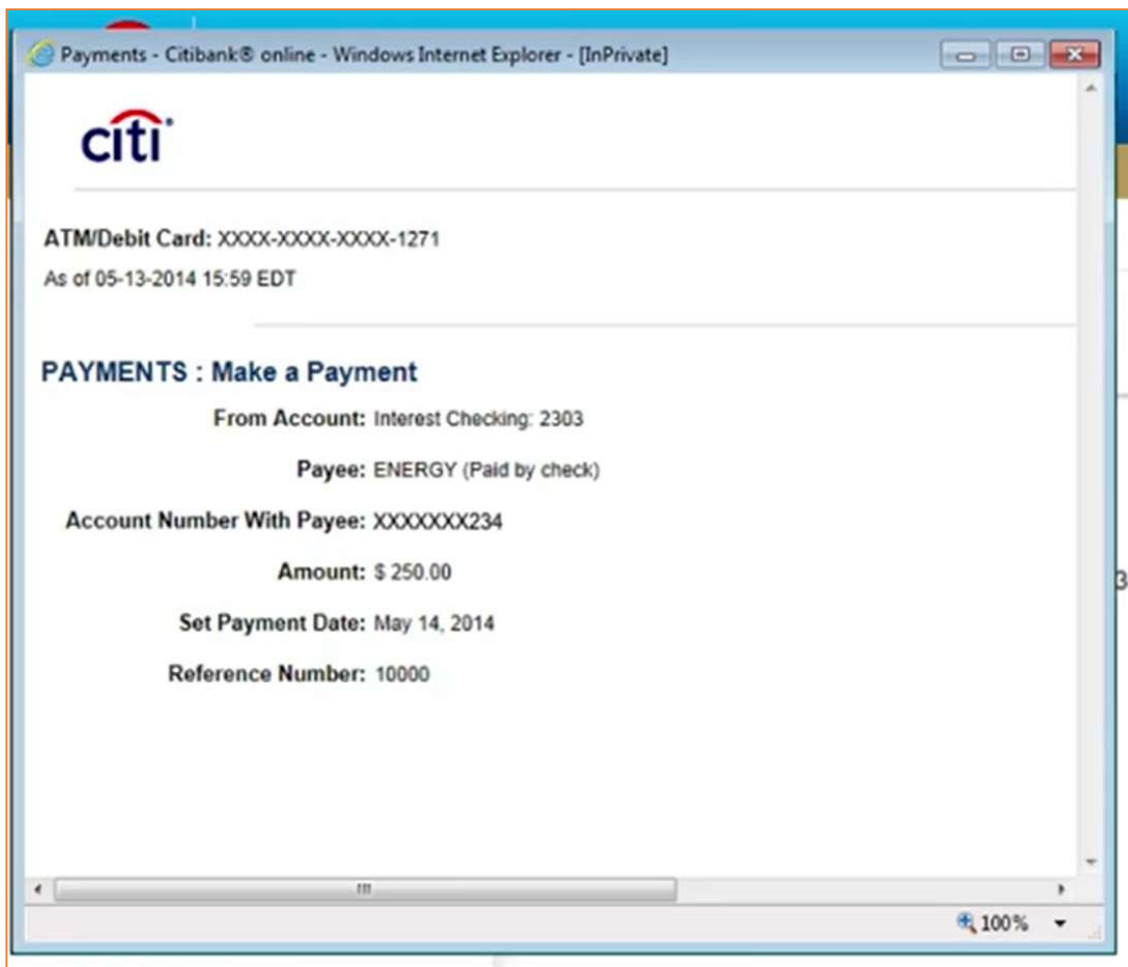
Set Payment Date: 05-14-2014 mm-dd-yyyy

Memo:

Allowable characters: Letters, numbers, the "at" sign (@), the "pound" sign (#), period, underscore and hyphen

Note: bank holidays and weekends will contribute to additional mailing time.

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

188. On information and belief, one or more components of the Citibank System employed and provided a method for receiving a verification result (e.g., status of the transaction) from the authorization server (e.g., Citibank's server), wherein the authorization server communicates the verification result to the mobile station (e.g., user device).

PAYMENTS


- PAY BILLS ▶
- TRANSFER BETWEEN LINKED ACCOUNTS ▶
- CITIBANK GLOBAL TRANSFERS - U.S./ABROAD ▶
- WIRE TRANSFERS ▶
- EXTERNAL TRANSFERS ▶
- POPMONEY ▶
- MANAGE PAYEES ▶

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Payee	Payment Method	Last Payment	Scheduled Payments
 ENERGY	Check		

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

PAYMENTS


- PAY BILLS ▶
- TRANSFER BETWEEN LINKED ACCOUNTS ▶
- CITIBANK GLOBAL TRANSFERS - U.S./ABROAD ▶
- WIRE TRANSFERS ▶
- EXTERNAL TRANSFERS ▶
- POPMONEY ▶
- MANAGE PAYEES ▶

Common Questions

- ▶ How long does it take for a payee to receive a bill payment?
- ▶ When are online bill payments deducted from my account?

Make a Payment

From Account: Interest Checking: 2303 \$ 1,892.46 available now

Payee:  ENERGY (Paid by check)
 Account Number With Payee: XXXXXX234
 Last Payment: \$ 0.00

Amount: \$

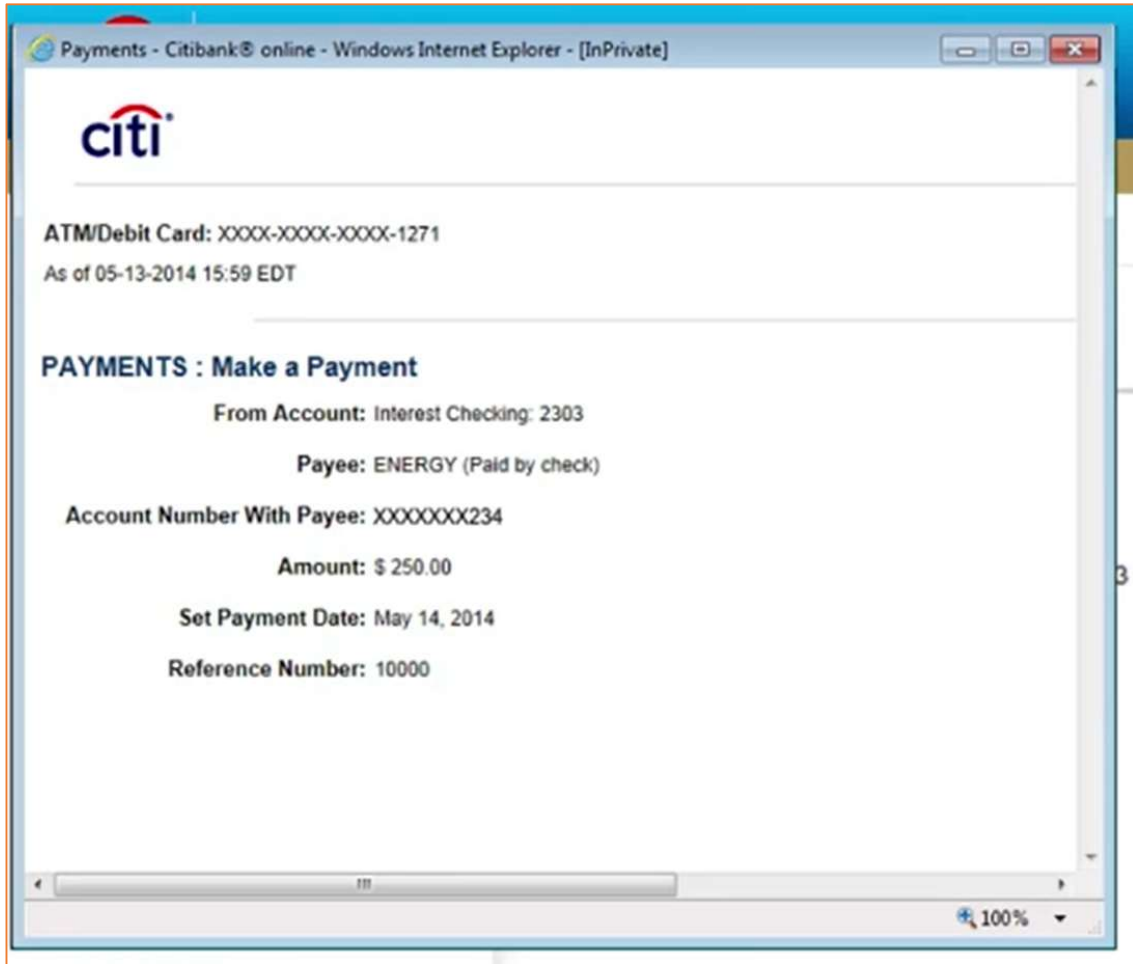
Set Payment Date:

Memo:

Allowable characters: Letters, numbers, the "at" sign (@), the "pound" sign (#), period, underscore and hyphen

Note: bank holidays and weekends will contribute to additional mailing time.

See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.



See e.g., <https://www.youtube.com/watch?v=o7XOKFTZgt0>.

189. On information and belief, Citibank directly infringed at least claim 6 of the '888 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Citibank Products and Services; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Citibank System.

190. On information and belief, Citibank has been on notice of the '888 patent since at least as early as the May 2020 Notice Letter and/or the August 2020 Notice Letter concerning its infringement of the Patents-in-Suit.

191. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter, Citibank knowingly encouraged its customers to directly infringe one or more claims of the '888 patent, including by Citibank's actions that include, without limitation, instructing and encouraging its customers to use the Citibank Products and Services and the Citibank System, including but not limited to the examples cited above.

192. On information and belief, at least since the May 2020 Notice Letter and/or the August 2020 Notice Letter regarding the Patents-in-Suit, Citibank knew the acts it induced its customers to take constituted patent infringement and Citibank's encouraging acts resulted in direct infringement of one or more claims of the '888 patent by its customers.

193. On information and belief, Citibank instructed and continues to instruct customers to use the Citibank Products and Services and the Citibank System, including, without limitation, through Citibank's website, which provides access to, and support for therefore.

194. On information and belief, Citibank's customers directly infringed at least claim 6 of the '888 patent through their use of the Citibank Products and Services and the Citibank System.

195. On information and belief, Citibank is in violation of 35 U.S.C. § 271(b) and has, at least since its May and/or August 2020 knowledge of the '888 patent, indirectly infringed at least claim 6 of the '888 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Citibank's customers) and possessing specific intent to encourage infringement by Citibank's

users of the Citibank Products and Services and the Citibank System. The components of the Citibank Products and Services and the Citibank System are specifically configured to function in accordance with the '888 patent claims and are material parts of the invention.

196. Citibank's direct and indirect infringement has damaged Kioba and caused it to suffer damages.

JURY DEMANDED

197. Pursuant to Federal Rule of Civil Procedure 38(b), Kioba hereby requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Kioba respectfully requests this Court to enter judgment in Advanced Transaction's favor and against Citibank as follows:

- a. finding that Citibank has infringed one or more claims of the '134 patent under 35 U.S.C. § 271(a) and/or (b);
- b. finding that Citibank has infringed one or more claims of the '610 patent under 35 U.S.C. § 271 (a) and/or (b);
- c. finding that Citibank has infringed one or more claims of the '902 patent under 35 U.S.C. § 271(a) and/or (b);
- d. finding that Citibank has infringed one or more claims of the '382 patent under 35 U.S.C. § 271(a) and/or (b);
- e. finding that Citibank has infringed one or more claims of the '078 patent under 35 U.S.C. § 271(a) and/or (b);

- f. finding that Citibank has infringed one or more claims of the '915 patent under 35 U.S.C. § 271(a) and/or (b);
- g. finding that Citibank has infringed one or more claims of the '888 patent under 35 U.S.C. § 271(a) and/or (b);
- h. awarding Kioba damages under 35 U.S.C. § 284, or otherwise permitted by law;
- i. awarding Kioba pre-judgment and post-judgment interest on the damages award and costs;
- j. declaring that Citibank has willfully infringed one or more claims of the Patents-in-Suit;
- k. awarding treble damages pursuant to U.S.C. § 284 as a result of Citibank's willful conduct in relation to one or more claims of the Patent-in-Suit;
- l. awarding cost of this action (including all disbursements) and attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by the law; and
- m. awarding such other costs and further relief that the Court determines to be just and equitable.

Dated: November 17, 2023

Respectfully submitted,

/s/ Zachary H. Ellis

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Texas State Bar No. 24122606

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*Not admitted to practice in Virginia