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7 *Attorney(s) for Plaintiff Digital Verification Systems, LLC*

8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10 DIGITAL VERIFICATION SYSTEMS,
11 LLC,

12 *Plaintiff,*

13 v.

14 TAIGLE, LLC d/b/a MSBDOCS,

15 *Defendant.*

CASE NO.: 8:21-cv-00809

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

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17
18 **COMPLAINT**

19 Plaintiff Digital Verification Systems, LLC (“Plaintiff” or “DVS”) files this
20 Complaint against Taigle, LLC, d/b/a MSBDOCS (“Defendant” or “Taigle”) for
21 infringement of United States Patent No. 9,054,860 (hereinafter “the ‘860 Patent”).

22 **PARTIES AND JURISDICTION**

23 1. This is an action for patent infringement under Title 35 of the United
24 States Code. Plaintiff is seeking injunctive relief as well as damages.

25 2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331
26 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent
27 infringement arising under the United States patent statutes.
28

1 3. Plaintiff is a Texas limited liability company located at 1 East Broward
2 Boulevard, Suite 700, Fort Lauderdale, FL 33301.

3 4. On information and belief, Defendant is a California limited liability
4 company with its principal office located at 1 Park Plaza, Suite 600, Irvine, CA, US,
5 92614. On information and belief, Defendant may be served through its registered
6 agent, Navneet Chugh, 15925 Carmenita Rd., Cerritos CA 90703.

7 5. On information and belief, this Court has personal jurisdiction over
8 Defendant because Defendant has committed, and continues to commit, acts of
9 infringement in this District, has conducted business in this District, and/or has
10 engaged in continuous and systematic activities in this District.

11 6. On information and belief, Defendant's instrumentalities that are alleged
12 herein to infringe were and continue to be used, imported, offered for sale, and/or sold
13 in this District.

14 **VENUE**

15 7. On information and belief, venue is proper in this District under 28
16 U.S.C. § 1400(b) because Defendant is deemed to reside in this District.
17 Alternatively, acts of infringement are occurring in this District and Defendant has a
18 regular and established place of business in this District.

19 **COUNT I**

20 **(INFRINGEMENT OF UNITED STATES PATENT NO. 9,054,860)**

21 8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

22 9. This cause of action arises under the patent laws of the United States
23 and, in particular, under 35 U.S.C. §§ 271, *et seq.*

24 10. Plaintiff is the owner by assignment of the '860 Patent with sole rights
25 to enforce the '860 Patent and sue infringers.

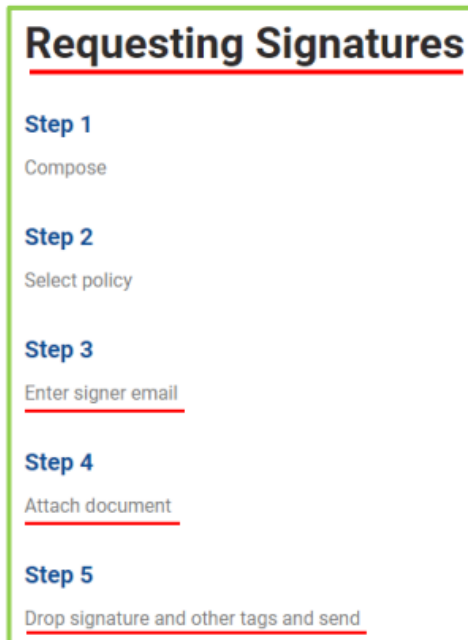
26 11. A copy of the '860 Patent, titled "Digital Verified Identification System
27 and Method," is attached hereto as Exhibit A.

28 12. The '860 Patent is valid, enforceable, and was duly issued in full

1 compliance with Title 35 of the United States Code.

2 13. Upon information and belief, Defendant has infringed and continues to
3 infringe one or more claims, including at least Claim 1, of the ‘860 Patent by making,
4 using (at least by having its employees, or someone under Defendant's control, test
5 the accused Product), importing, selling, and/or offering for sale associated hardware
6 and/or software for digital signature services (e.g., MSBDOcs), and any similar
7 products and/or services (“Product”) covered by at least Claim 1 of the ‘860 Patent.
8 Defendant has infringed and continues to infringe the ‘860 patent either directly or
9 through acts of contributory infringement or inducement in violation of 35 U.S.C. §
10 271.

11 14. The Product provides a system for e-signing digital documents. The
12 Product provides for digitally verifying the identification of a signer. Certain aspects
13 of this element are illustrated in the screenshot(s) below and/or in those provided in
14 connection with other allegations herein.

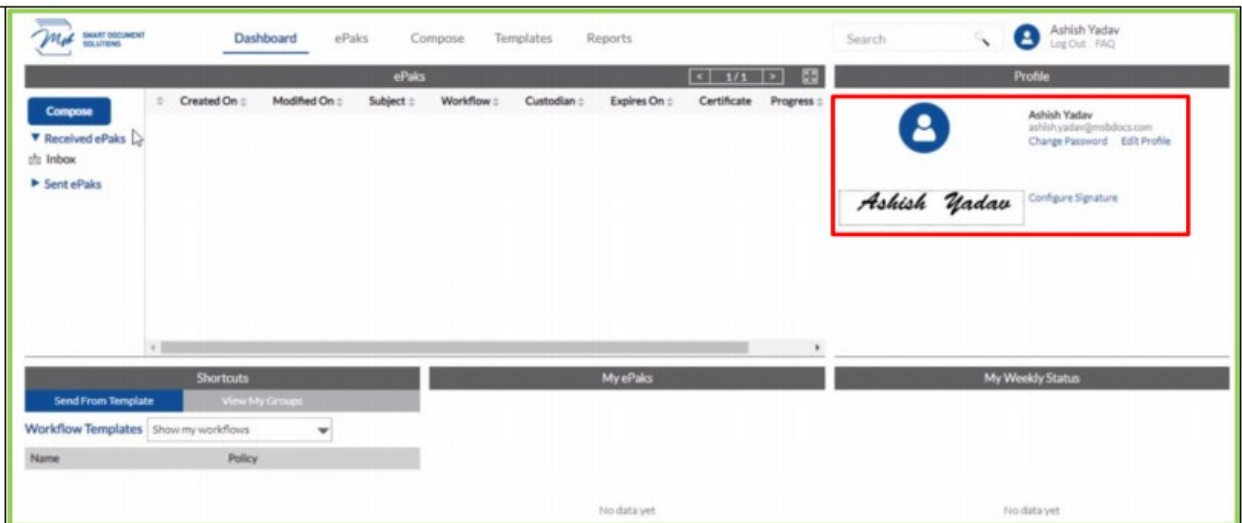


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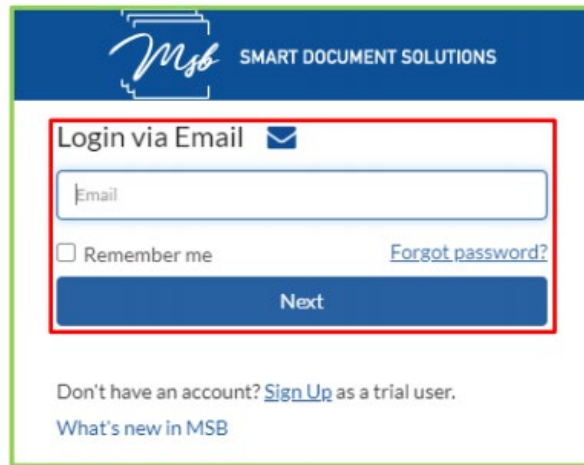
Source: <https://www.msbdocs.com/>

28 15. The Product includes at least one digital identification module structured

1 to be associated with at least one entity. For example, the Product provides a module
 2 (e.g., creation of an e-signature module for a user) to be associated with at least one
 3 entity (i.e., a user who needs to create an e-signature). Certain aspects of this element
 4 are illustrated in the screenshot(s) below and/or in those provided in connection with
 5 other allegations herein.



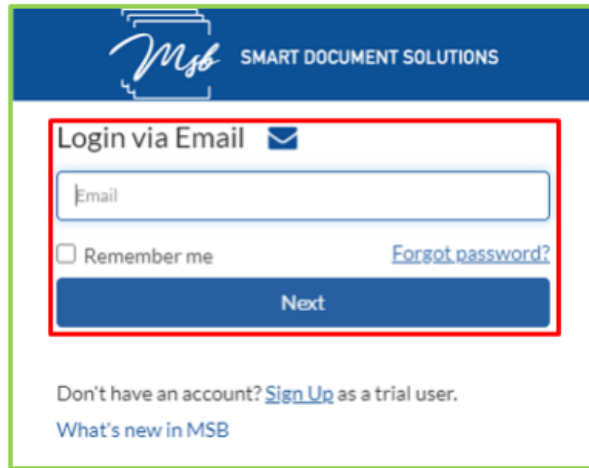
14 Source: <https://www.msbdocs.com/how-msb-works>



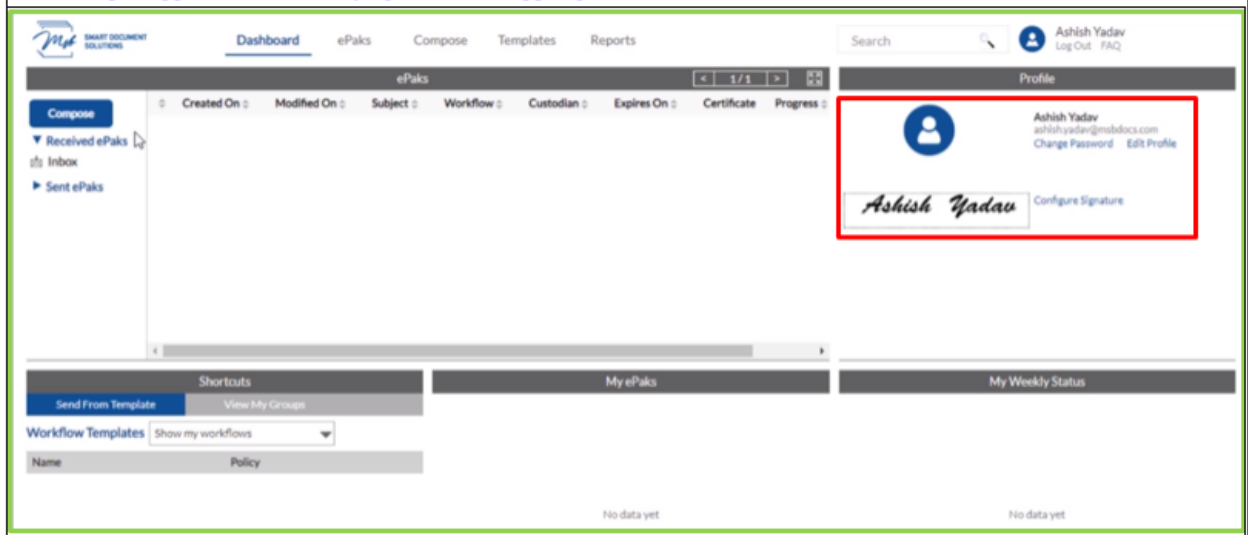
22 Source: <https://app.msbdocs.com/mysignaturebook/app/login>

24 16. The Product includes a module generating assembly structured to receive
 25 at least one verification data element corresponding to the at least one entity and create
 26 said at least one digital identification module. For example, the Product includes a
 27 module generating assembly structured to receive at least one verification data
 28 element corresponding to at least one entity (e.g., a user has a unique login ID and

1 password for accessing and verifying the account for e-signing the documents). The
 2 module generating assembly is also structured to create the at least one digital
 3 identification module (e.g., creating an e-signature of a user). Certain aspects of this
 4 element are illustrated in the screenshot(s) below and/or in those provided in
 5 connection with other allegations herein.



13 Source: <https://app.msbdocs.com/mysignaturebook/app/login>



23 Source: <https://www.msbdocs.com/how-msb-works>

24
 25 17. The at least one digital identification module is disposable within at least
 26 one electronic file. (e.g., a user can store the e-signature within a document such as
 27 a “Bill of Landing” or in a PDF, Word doc, image file, etc.). Certain aspects of this
 28 element are illustrated in the screenshot(s) below and/or in those provided in

1 connection with other allegations herein.

2 **Requesting Signatures**

3 **Step 1**

4 Compose

5 **Step 2**

6 Select policy

7 **Step 3**

8 Enter signer email

9 **Step 4**

10 Attach document

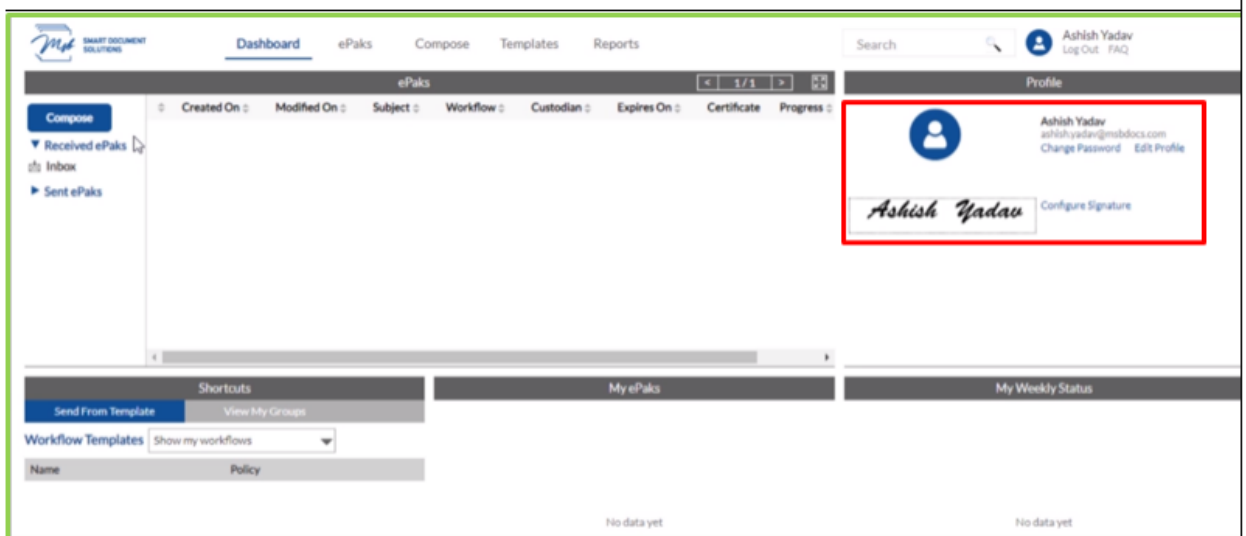
11 **Step 5**

12 Drop signature and other tags and send



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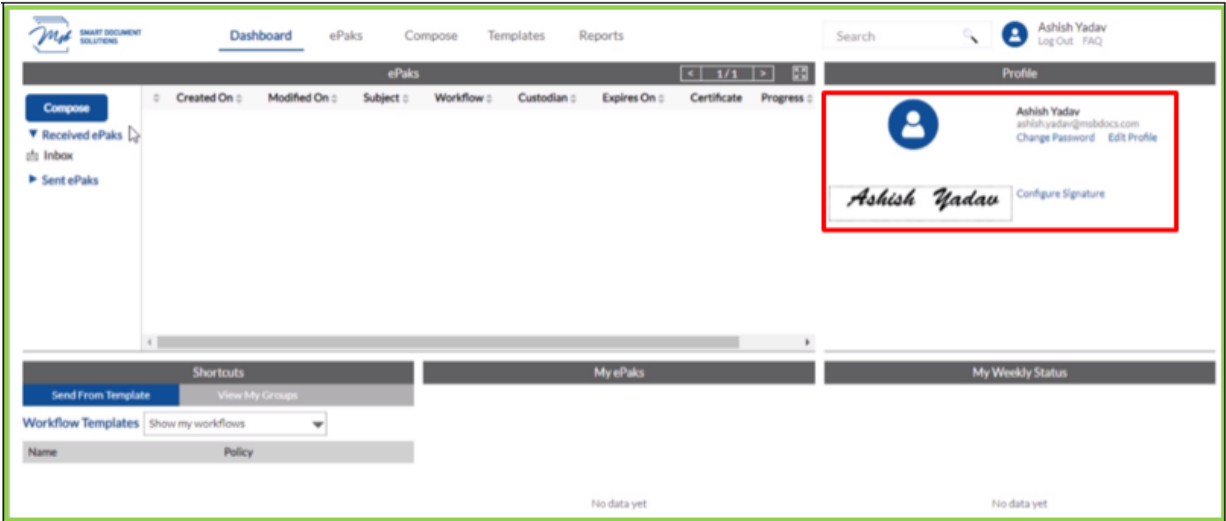
25 Source: <https://www.msbdocs.com/how-msb-works>

26

27 18. The at least one digital identification module includes at least one

28 primary component structured to at least partially associate the digital identification

1 module with the at least one entity. For example, an e-signature of a user is associated
2 with user information including user name, date, etc. to at least partially associate the
3 digital identification module with the at least one entity (e.g., an e-signature is
4 associated with a user). Certain aspects of this element are illustrated in the
5 screenshot(s) below and/or in those provided in connection with other allegations
6 herein.



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23 Source: <https://www.msbdocs.com/>



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19. The at least one digital identification module is cooperatively structured to be embedded within only a single electronic file. For example, the module (e-signature) is stored within a single file (such as a PDF, Word doc, or image file, etc.). Certain aspects of this element are illustrated in the screenshot(s) below and/or in those provided in connection with other allegations herein.

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Requesting Signatures

- Step 1**
Compose
- Step 2**
Select policy
- Step 3**
Enter signer email
- Step 4**
Attach document
- Step 5**
Drop signature and other tags and send

Source: <https://www.msbdocs.com/how-msb-works>

The screenshot shows the MSBDOCS dashboard. At the top, there are navigation tabs for Dashboard, ePaks, Compose, Templates, and Reports. A search bar and user profile for Ashish Yadav are on the right. The main content area is divided into sections: 'Compose' with a 'Compose' button, 'Received ePaks', 'Inbox', and 'Sent ePaks'. A 'Profile' section on the right is highlighted with a red box, showing the user's name, email, and a signature. Below this are sections for 'Shortcuts', 'Workflow Templates', 'My ePaks', and 'My Weekly Status'. The 'My ePaks' and 'My Weekly Status' sections show 'No data yet'.

Source: <https://www.msbdocs.com/how-msb-works>

1 20. Defendant's actions complained of herein will continue unless
2 Defendant is enjoined by this court.

3 21. Defendant's actions complained of herein are causing irreparable harm
4 and monetary damage to Plaintiff and will continue to do so unless and until
5 Defendant is enjoined and restrained by this Court.

6 22. Plaintiff is in compliance with 35 U.S.C. § 287.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiff asks the Court to:

9 (a) Enter judgment for Plaintiff on this Complaint on all causes of action
10 asserted herein;

11 (b) Enter an Order enjoining Defendant, its agents, officers, servants,
12 employees, attorneys, and all persons in active concert or participation with Defendant
13 who receive notice of the order from further infringement of United States Patent No.
14 9,054,860 (or, in the alternative, awarding Plaintiff a running royalty from the time of
15 judgment going forward);

16 (c) Award Plaintiff damages resulting from Defendant's infringement in
17 accordance with 35 U.S.C. § 284;

18 (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

19 (e) Award Plaintiff such further relief to which the Court finds Plaintiff
20 entitled under law or equity.

21

22 Dated: April 30, 2021

Respectfully submitted,

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/s/ Stephen M. Lobbin
*Attorney(s) for Plaintiff Digital Verification
Systems, LLC*

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