

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>RIGGS TECHNOLOGY</b>	)	
<b>HOLDINGS, LLC,</b>	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No. 1:21-cv-6124</b>
<b>v.</b>	)	
	)	
<b>COURSERA, INC.</b>	)	<b>JURY TRIAL DEMANDED</b>
<b>Defendant.</b>	)	

**PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT  
INFRINGEMENT**

Riggs Technology Holdings, LLC (“Riggs”) files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 7,299,067 (“the ‘067 patent”) (referred to as the “Patent-in-Suit”) by Coursera, Inc. (“Coursera”).

**I. THE PARTIES**

1. Plaintiff Riggs is a New Mexico Corporation with its principal place of business located in Bernalillo County, New Mexico.

2. On information and belief, Coursera is a corporation existing under the laws of the State of Delaware, with a principal place of business located at 119 W 24<sup>th</sup> St., New York, NY 10011. On information and belief, Coursera sells and offers to sell products and services throughout New York, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in New York and this

judicial district. Coursera may be served through their registered agent, CSC, 80 State Street, Albany, NY, United States, 12207 or anywhere else they may be found.

## **II. JURISDICTION AND VENUE**

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271, et. seq.

4. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of New York and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of New York and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of New York and in this judicial district.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in New York and this District.

## **III. INFRINGEMENT**

### **A. Infringement of the '067 Patent**

6. On November 20, 2007, U.S. Patent No. 7,299,067 (“the ‘067 patent”, attached as Exhibit A) entitled “Methods and Systems for Managing the Provision of Training Provided Remotely Through Electronic Data Networks to Users of Remote Electronic Devices” was duly and legally issued by the U.S. Patent and Trademark Office. Riggs owns the ‘067 patent by assignment.

7. The ‘067 patent relates to a novel and improved methods and systems for providing and managing training remotely.

8. Coursera maintains, operates, and administers online and software based training platforms, products and services that facilitate remote training that infringes one or more claims of the ‘067 patent, including one or more of claims 1-18, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘067 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

9. Support for the allegations of infringement may be found in the following preliminary table:

US7299067 B2

Coursera

1. A method of managing training completed remotely at a hand held device, said method comprising the step of:



**coursera**



# Your Course to Success

Build skills with courses, certificates, and degrees online from world-class universities and companies.

[Join for Free](#)

© 2021 Coursera Inc. All rights reserved.

[<https://www.coursera.org/>](https://www.coursera.org/)

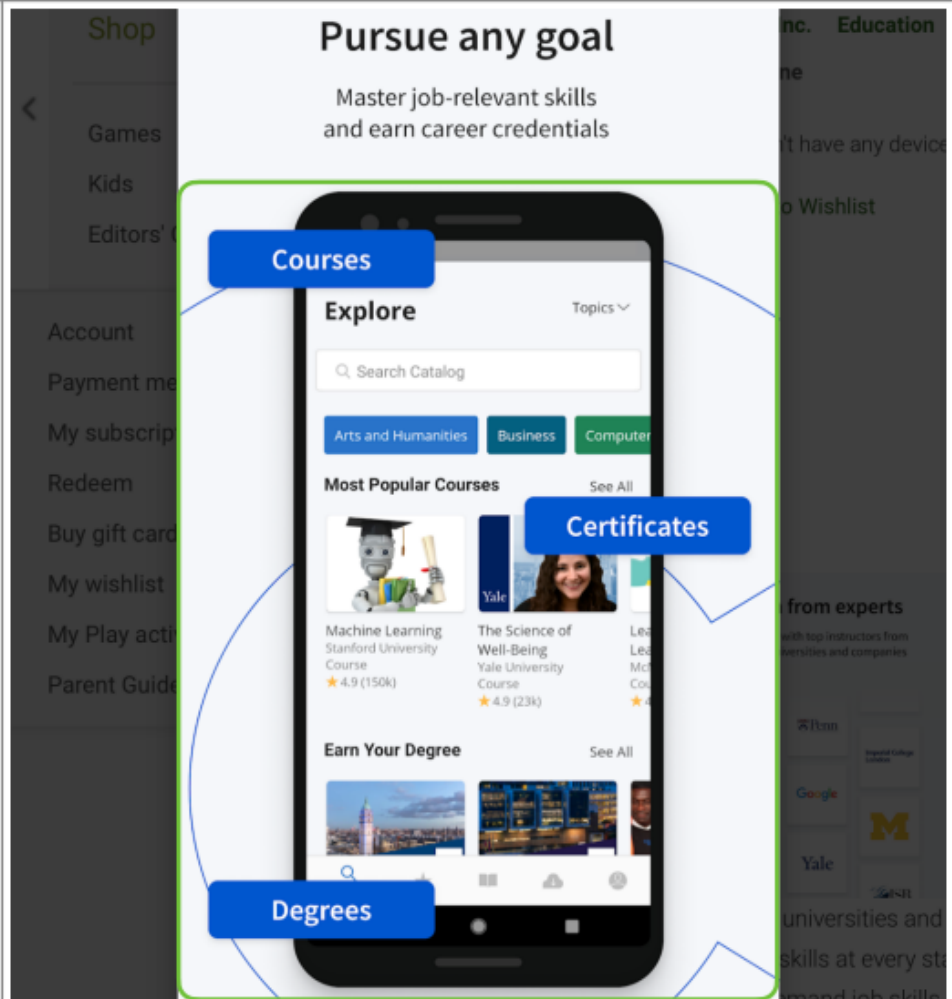
Coursera has a method of managing training completed remotely at a hand held device.

The reference includes subject matter disclosed by the claims of the patent after the priority date.

US7299067 B2

Coursera

receiving at a training server training data transmitted to the training server through a data network from a user of a hand held device, the training data representing training taken by the user at hand held device;



<https://play.google.com/store/apps/details?id=org.coursera.android>

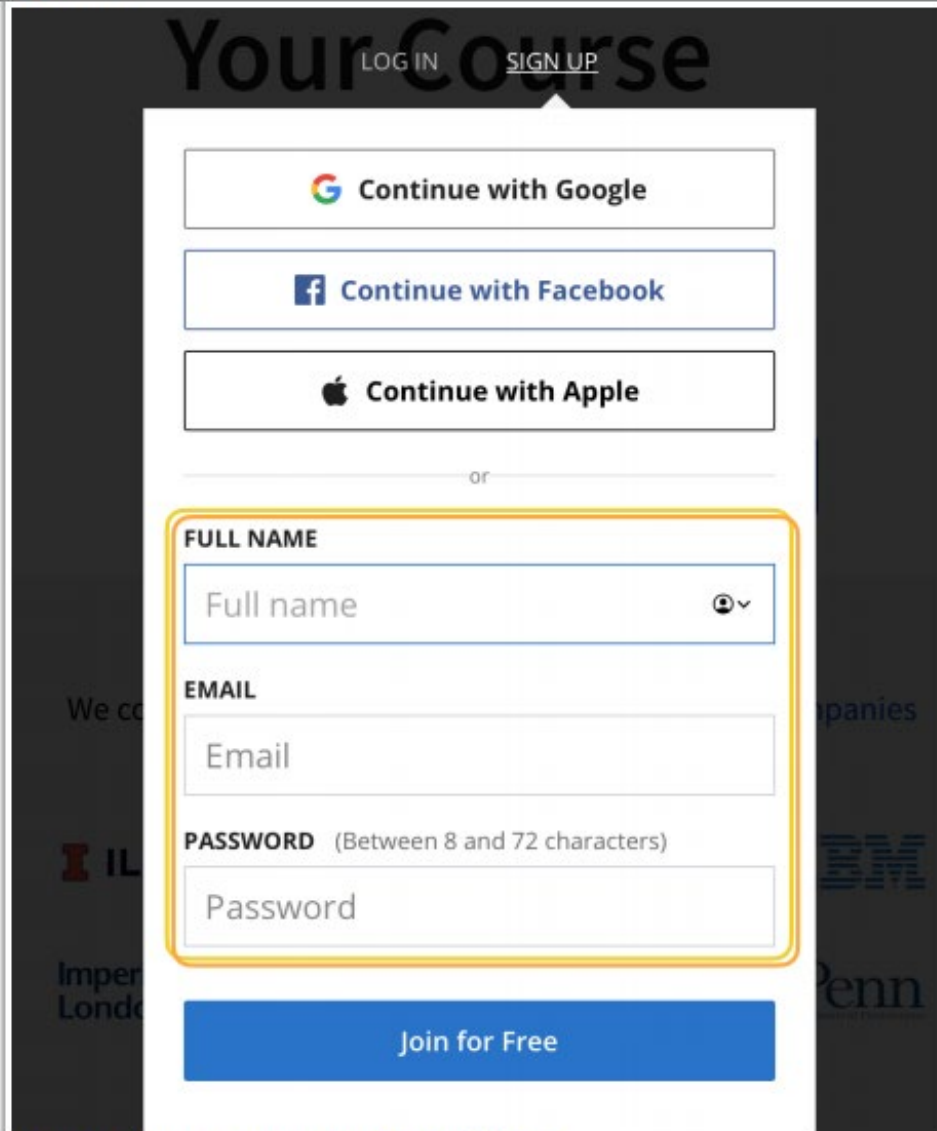
The reference describes receiving at a training server training data transmitted to the training server through a data network from a user of a hand held device, the training data representing training taken by the user at hand held device.

US7299067 B2

Coursera

receiving identifying information for the user of a hand held device concurrently with the training data file;

identifying the user of the hand held device;



<https://www.coursera.org/?authMode=signup>

The reference describes receiving identifying information for the user of a hand held device concurrently with the training data file.

The reference describes identifying the user of the hand held device.

US7299067 B2

Coursera

authenticating the identify of the user of the hand held device by requesting authentication data from the user and comparing the authentication data with a master user identification template containing authentication data associated with the user and accessible by the training server to determine if said comparison authenticates the user's identify as an authorized trainee;

The Coursera for Campus Student plan is available to full-time, part-time, community college, and university students. To verify eligibility, we are using a database of publicly available college and university email domains. To gain access, sign up with your university or college-issued email address. If your email domain is included on Coursera's list of universities and colleges, you will be granted access to the Student plan. If not, please provide your school information so we can work to grant access to students at your school. Once we validate the information provided and launch a program we inform you by email. Due to the volume of students, this may take a few weeks. We appreciate your patience.

<https://www.coursera.org/for-university-and-college-students/>

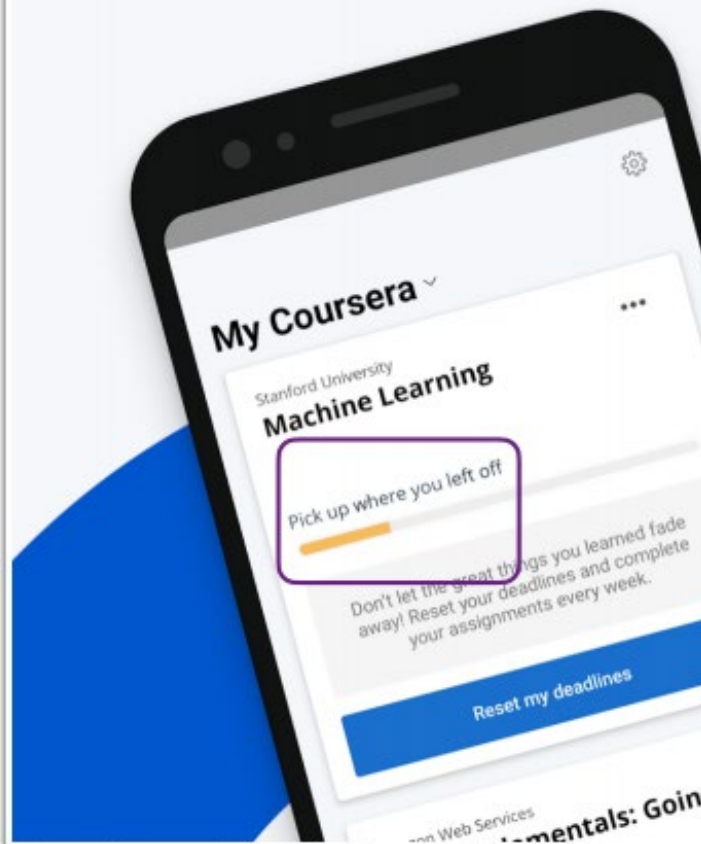
The reference describes authenticating the identify of the user of the hand held device by requesting authentication data from the user and comparing the authentication data with a master user identification template containing authentication data associated with the user and accessible by the training server to determine if said comparison authenticates the user's identify as an authorized trainee.

US7299067 B2

Coursera

recording the training data in memory associated with the training server;

# Achieve your goals with the world's best learning online



<https://play.google.com/store/apps/details?id=org.coursera.android>

The reference describes recording the training data in memory associated with the training server.



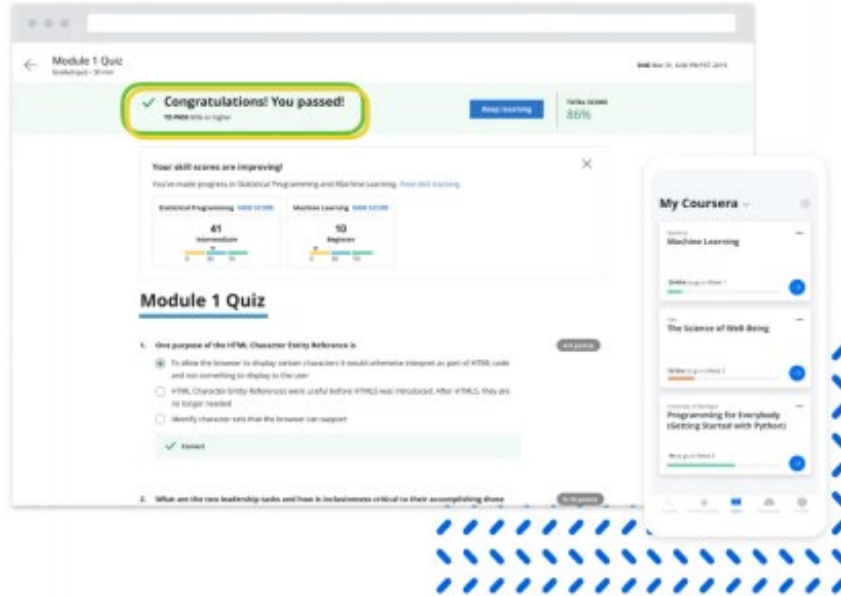
US7299067 B2

Coursera

locating at least one training file contained within the training data;

determining status of the training file by comparing the training file with an associated master training template accessible from memory by the training server, the status including a determination if training represented by the training file meets a set criterion including at least one of: pending, incomplete, failed, passed; and

recording training status in memory.



<https://www.coursera.org/>

The reference describes locating at least one training file contained within the training data.

The reference describes determining status of the training file by comparing the training file with an associated master training template accessible from memory by the training server, the status including a determination if training represented by the training file meets a set criterion including at least one of: pending, incomplete, failed, passed.

The reference describes recording training status in memory.

These allegations of infringement are preliminary and are therefore subject to change.

10. Coursera has and continues to induce infringement. Coursera has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., managing training certifications) such as to cause infringement of one or more of claims 1–18 of the ‘067 patent, literally or under the doctrine of equivalents. Moreover, Coursera has known or should have known of the ‘067 patent and the technology underlying it from at least the date of issuance of the patent, but at least from the date of the lawsuit.

11. Coursera has and continues to contributorily infringe. Coursera has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., managing training certifications) and related services such as to cause infringement of one or more of claims 1–18 of the ‘067 patent, literally or under the doctrine of equivalents. Moreover, Coursera has known or should have known of the ‘067 patent and the technology underlying it from at least the date of issuance of the patent, but at least from the date of the lawsuit

12. Coursera has caused and will continue to cause RIGGS damage by direct and indirect infringement of (including inducing infringement of) the claims of the ‘067 patent.

#### **IV. JURY DEMAND**

RIGGS hereby requests a trial by jury on issues so triable by right.

#### **V. PRAYER FOR RELIEF**

WHEREFORE, RIGGS prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the ‘067 patent;
- b. award RIGGS damages in an amount sufficient to compensate it for Defendant’s infringement of the ‘067 patent in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;
- c. award RIGGS an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;
- d. declare this case to be “exceptional” under 35 U.S.C. § 285 and award RIGGS its attorneys’ fees, expenses, and costs incurred in this action;

- e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award RIGGS such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ David J. Hoffman

David J. Hoffman  
254 W 15th St., Apt. 2C  
New York, New York 10011  
(917) 701-3117 (telephone)  
djhoffman@djhoffmanlaw.com

RAMEY & SCHWALLER, LLP

/s/William P. Ramey, III

William P. Ramey, III (*Pro Hac Vice Anticipated*)

Texas State Bar No. 24027643

Jeffrey Kubiak (*Pro Hac Vice Anticipated*)

Texas State Bar No. 24028470

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

(713) 426-3923 (telephone)

(832) 900-4941 (fax)

wramey@rameyfirm.com

jkubiak@rameyfirm.com

***ATTORNEYS FOR RIGGS TECHNOLOGY  
HOLDINGS, LLC***