

EX1028

**U.S. District Court
North Carolina Middle District (NCMD)
CIVIL DOCKET FOR CASE #: 1:24-cv-00314-WO-JEP**

FULLTHROTTLE TECHNOLOGIES, LLC v. ROCKET MEDIA, LLC
Assigned to: JUDGE WILLIAM L. OSTEEEN, JR
Referred to: MAG/JUDGE JOI ELIZABETH PEAKE
Cause: 35:271 Patent Infringement

Date Filed: 04/11/2024
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

FULLTHROTTLE TECHNOLOGIES, LLC

represented by **MICHAEL BONELLA**
FLASTER GREENBERG P.C.
1717 ARCH STREET
SUITE 3300
PHILADELPHIA, PA 19103
215-587-5684
Email: michael.bonella@flastergreenberg.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

AAKASH PATEL
FLASTER GREENBERG P.C.
1717 ARCH STREET
SUITE 3300
PHILADELPHIA, PA 19103
215-587-5679
Email: aakash.patel@flastergreenberg.com
ATTORNEY TO BE NOTICED

CARMELLE F. ALPIO
WILLIAMS MULLEN
301 FAYETTEVILLE STREET
SUITE 1700
RALEIGH, NC 27601
919-981-4038
Fax: 919-981-4300
Email: calipio@williamsmullen.com
ATTORNEY TO BE NOTICED

CORALEINE KITT
FLASTER GREENBERG P.C.
1717 ARCH STREET
SUITE 3300
PHILADELPHIA, PA 19103
516-808-7696
Email: coraleine.kitt@flastergreenberg.com
ATTORNEY TO BE NOTICED

ANDREW R. SHORES

WILLIAMS MULLEN
301 FAYETTEVILLE STREET
SUITE 1700
RALEIGH, NC 27601
919-981-4015
Email: ashores@williamsmullen.com
ATTORNEY TO BE NOTICED

V.

Defendant

ROCKET MEDIA, LLC
d/b/a LAUNCH LABS

represented by **KELLY MARGOLIS DAGGER**
ELLIS & WINTERS, LLP
4131 PARKLAKE AVENUE, STE. 400
RALEIGH, NC 27612
919-573-1292
Fax: 919-685-7010
Email: kelly.dagger@elliswinters.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

CHELSEA PIERONI
ELLIS & WINTERS LLP
4131 PARKLAKE AVE
SUITE 400
RALEIGH, NC 27612
919-719-0569
Fax: 919-865-7010
Email: chelsea.pieroni@elliswinters.com
ATTORNEY TO BE NOTICED

RYAN K. IWAHASHI
GISH PLLC
50 CALIFORNIA ST.
SUITE 1500
SAN FRANCISCO, CA 94111
408-223-5383
Email: ryan@gishpllc.com
ATTORNEY TO BE NOTICED

SCOTTIE F. LEE
ELLIS & WINTERS, LLP
POB 2752
GREENSBORO, NC 27402
336-217-4085
Fax: 336-217-4198
Email: scottie.lee@elliswinters.com
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
04/11/2024	1	COMPLAINT for Patent Infringement against Rocket Media, LLC (d/b/a Launch Labs) (Filing fee \$ 405 receipt number ANCMDC-3809496.), filed by FullThrottle Technologies, LLC. (Attachments: # 1 Exhibit A - U.S. Patent No. 11,556,947, # 2 Exhibit B - U.S. Patent No. 11,823,219, # 3 Exhibit C - Safari Privacy Overview - Learn how the Safari web browser protects your privacy (Nov. 2019), # 4 Exhibit D - Google Blogs - The next step toward phasing Launch Labs EX1028 Page 2

		out third-party cookies in Chrome (Dec. 14, 2023), # 5 Exhibit E - Google Developers Third-party cookies restricted by default for 1% of Chrome user (Jan. 1, 2024), # 6 Exhibit F - Launch Labs Thriving in the Post-Third-Party Cookie Era (Feb. 2, 2024), # 7 Exhibit G - Tracking and Privacy Changes for Local Business: Capitalizing on the loss of Third-Party Cookies, # 8 Exhibit H - fullthrottle.ai Audience Generation, # 9 Exhibit I - Launch Labs Automotive, # 10 Exhibit J - Launch Labs Home, # 11 Exhibit K - Launch Labs API Docs, # 12 Exhibit L - atmain2.js JavaScript Computer Source Code taken from, # 13 Exhibit M - Launch Labs - Geolocation Marketing Demystified, # 14 Exhibit N - Launch Labs - Your First 90 Days with Ignite: A Guide to Success, # 15 Exhibit O - HTTP Headers Received by Launch Labs, # 16 Exhibit P - Launch Labs - Drive More Automotive Sales Leads From Interest to Conversion, # 17 Exhibit Q - Launch Labs Technology, # 18 Exhibit R - fullthrottle.ai Patent Announcement U.S. Patent No. 11,556,947, # 19 Exhibit S - fullthrottle.ai Patent Announcement U.S. Patent No. 11,823,219, # 20 Exhibit T - CF Search Marketing ShopperID, # 21 Exhibit U - Launch Labs - Atlanta Honda Dealership Case Study, # 22 Exhibit V - fullthrottle.ai Home Page, # 23 Civil Cover Sheet) (SHORES, ANDREW) (Entered: 04/11/2024)
04/11/2024	2	NOTICE of Attorney Appearance by attorney ANDREW R. SHORES on behalf of Plaintiff FullThrottle Technologies, LLC (SHORES, ANDREW) (Entered: 04/11/2024)
04/11/2024	3	Corporate Disclosure Statement identifying Corporate Parent Stream Companies Holdings, LLC, Corporate Parent Cavalier Enterprise Holdings, Inc., Corporate Parent Hawk Enterprise Holdings, Inc., Corporate Parent SCP IV AIV V, LP for FullThrottle Technologies, LLC.. (SHORES, ANDREW) (Entered: 04/11/2024)
04/12/2024	4	NOTICE of Attorney Appearance by attorney CARMELLE F. ALIPIO on behalf of Plaintiff FULLTHROTTLE TECHNOLOGIES, LLC (ALIPIO, CARMELLE) (Entered: 04/12/2024)
04/12/2024		Case ASSIGNED to JUDGE WILLIAM L. OSTEEEN, JR and MAG/JUDGE L. PATRICK AULD. (cc) (Entered: 04/12/2024)
04/12/2024		CASE REFERRED to Mediation pursuant to Local Rule 83.9b of the Rules of Practice and Procedure of this Court. Please go to our website under Attorney Information for a list of mediators which must be served on all parties. (cc) (Entered: 04/12/2024)
04/12/2024	6	NOTICE of Special Appearance by attorney CORALEINE KITT on behalf of Plaintiff FULLTHROTTLE TECHNOLOGIES, LLC (Filing fee \$ 25 receipt number ANCMDC-3810904.) (Attachments: # 1 Certificate of Service)(KITT, CORALEINE) (Entered: 04/12/2024)
04/15/2024	7	Summons Issued as to ROCKET MEDIA, LLC. (cc) (Entered: 04/15/2024)
04/15/2024	8	Notice of Right to Consent. Counsel shall serve the attached form on all parties. (Attachments: # 1 Consent to Jurisdiction). (cc) (Entered: 04/15/2024)
04/17/2024	9	NOTICE of Special Appearance by attorney MICHAEL BONELLA on behalf of Plaintiff FULLTHROTTLE TECHNOLOGIES, LLC (Filing fee \$ 25 receipt number ANCMDC-3813089.) (Attachments: # 1 Certificate of Service)(BONELLA, MICHAEL) (Entered: 04/17/2024)
04/17/2024	10	NOTICE of Special Appearance by attorney AAKASH PATEL on behalf of Plaintiff FULLTHROTTLE TECHNOLOGIES, LLC (Filing fee \$ 25 receipt number ANCMDC-3813090.) (Attachments: # 1 Certificate of Service)(PATEL, AAKASH) (Entered: 04/17/2024)
04/18/2024	11	SUMMONS Returned Executed by FULLTHROTTLE TECHNOLOGIES, LLC as to ROCKET MEDIA, LLC served on 4/17/2024, answer due 5/8/2024. Served Summons Richard Garrett Roach, Reg Agent. (SHORES, ANDREW) (Entered: 04/18/2024)
04/18/2024	12	NOTICE of Attorney Appearance by attorney KELLY MARGOLIS DAGGER on behalf of Defendant ROCKET MEDIA, LLC (DAGGER, KELLY) (Entered: 04/18/2024)
04/18/2024	13	Corporate Disclosure Statement. (DAGGER, KELLY) (Entered: 04/18/2024)

04/18/2024	14	NOTICE of Attorney Appearance by attorney SCOTTIE F. LEE on behalf of Defendant ROCKET MEDIA, LLC (LEE, SCOTTIE) (Entered: 04/18/2024)
04/18/2024	15	NOTICE of Attorney Appearance by attorney CHELSEA PIERONI on behalf of Defendant ROCKET MEDIA, LLC (PIERONI, CHELSEA) (Entered: 04/18/2024)
04/19/2024	16	Consent MOTION for Extension of Time to File Answer re: 1 Complaint, filed by ROCKET MEDIA, LLC. (Attachments: # 1 Text of Proposed Order)(DAGGER, KELLY) Modified on 4/22/2024 to remove unnecessary punctuation. (lg) (Entered: 04/19/2024)
04/19/2024		ORDER granting 16 Motion for Extension of Time to Answer for ROCKET MEDIA, LLC. Answer due by 6/7/2024. Signed by John Brubaker, Clerk of Court, on 4/19/2024. (jsb) (Entered: 04/19/2024)
04/22/2024		Case Reassigned to MAG/JUDGE JOI ELIZABETH PEAKE. MAG/JUDGE L. PATRICK AULD no longer assigned to the case. (km) (Entered: 04/22/2024)
05/08/2024	17	NOTICE of Special Appearance by attorney RYAN K. IWAHASHI on behalf of Defendant ROCKET MEDIA, LLC (Filing fee \$ 25 receipt number ANCMDC-3828427.) (IWAHASHI, RYAN) (Entered: 05/08/2024)
06/03/2024	18	Consent MOTION for Extension of Time to File Answer re 1 Complaint by ROCKET MEDIA, LLC. (Attachments: # 1 Text of Proposed Order) (DAGGER, KELLY) (Entered: 06/03/2024)
06/04/2024		Motion Submitted to MAG/JUDGE JOI ELIZABETH PEAKE., re: 18 Consent MOTION for Extension of Time to File Answer re 1 Complaint. (jd) (Entered: 06/04/2024)
06/06/2024	19	ORDER granting 18 Motion for Extension of Time to Answer filed by All Defendants. Answer to Complaint due by 6/14/2024. Signed by MAG/JUDGE JOI ELIZABETH PEAKE on 6/6/24. (kg) (Entered: 06/06/2024)
06/14/2024	20	MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM by ROCKET MEDIA, LLC. Response to Motion due by 7/5/2024 (Attachments: # 1 Exhibit 1 - Amendments to Claims, U.S. Patent & Trademark Office Prosecution History for Application No. 17/687,992, # 2 Exhibit 2 - Notice of Allowability, U.S. Patent & Trademark Office Prosecution History for Application No. 17/687,992)(DAGGER, KELLY) (Entered: 06/14/2024)
06/14/2024	21	<i>Supporting</i> BRIEF re 20 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM by Defendant ROCKET MEDIA, LLC filed by ROCKET MEDIA, LLC. (DAGGER, KELLY) (Entered: 06/14/2024)
06/25/2024	22	Consent MOTION for Extension of Time to File Response/Reply as to 20 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM <i>and for Order Setting Briefing Schedule</i> by FULLTHROTTLE TECHNOLOGIES, LLC. (Attachments: # 1 Text of Proposed Order) (SHORES, ANDREW) (Entered: 06/25/2024)
06/25/2024		Motion Referred to MAG/JUDGE JOI ELIZABETH PEAKE re: 22 Consent MOTION for Extension of Time to File Response/Reply as to 20 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM <i>and for Order Setting Briefing Schedule</i> . (jd) (Entered: 06/25/2024)
07/02/2024	23	ORDER signed by MAG/JUDGE JOI ELIZABETH PEAKE on 07/02/2024, that the Motion [Doc. # 22] is GRANTED to the extent set out below, and the Court adopts the following schedule as set out herein.(at) (Entered: 07/02/2024)
08/07/2024	24	First AMENDED COMPLAINT <i>for Patent Infringement</i> against defendant ROCKET MEDIA, LLC, filed by FULLTHROTTLE TECHNOLOGIES, LLC. (Attachments: # 1 Ex. A. - U.S. Patent No. 11,556,947, # 2 Ex. B - U.S. Patent No. 11,823,219, # 3 Ex. C - U.S. Patent No. 12,051,083, # 4 Ex. D - Safari Privacy Whitepaper Nov. 2019, # 5 Ex. E - Google Blogs - The next step toward phasing out third-party cookies in Chrome (Dec. 14, 2023), # 6 Ex. F - Third-party cookies restricted by default for 1% of Chrome user (Jan. 1, 2024), # 7 Ex. G - Launch Labs Thriving in the Post-Third-Party Cookie Era (Feb. 2, 2024), # 8 Ex. H - Tracking and Privacy Changes for Local Business: Capitalizing on the loss of Third-Party Cookies, # 9 Ex. I -

		fullthrottle.ai Audience Generation, # 10 Ex. J. - Launch Labs Automotive, # 11 Ex. K - Launch Labs Home, # 12 Ex. L - Launch Labs - API Docs, # 13 Ex. M - JavaScript Computer Source Code taken from https://www.launchlabs.ai/ on March 5, 2024, # 14 Ex. N - Launch Labs - Geolocation Marketing Demystified, # 15 Ex. O - Launch Labs - Your First 90 Days with Ignite: A Guide to Success, # 16 Ex. P - HTTP Headers Received by Launch Labs, # 17 Ex. Q - Launch Labs - Drive More Automotive Sales Leads From Interest to Conversion, # 18 Ex. R - Launch Labs Technology, # 19 Ex. S - fullthrottle.ai Patent Announcement U.S. Patent No. 11,556,947, # 20 Ex. T - fullthrottle.ai Patent Announcement U.S. Patent No. 11,823,219, # 21 Ex. U - CF Search Marketing ShopperID, # 22 Ex. V - Launch Labs - Atlanta Honda Dealership Case Study, # 23 Ex. W - fullthrottle.ai Home Page, # 24 Ex. X - Launch Labs Marketing in the Age of Intelligence)(BONELLA, MICHAEL) (Entered: 08/07/2024)
09/06/2024	25	MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM by ROCKET MEDIA, LLC. Response to Motion due by 9/27/2024 (DAGGER, KELLY) (Entered: 09/06/2024)
09/06/2024	26	MEMORANDUM filed by Defendant ROCKET MEDIA, LLC re 25 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM filed by ROCKET MEDIA, LLC. (DAGGER, KELLY) (Entered: 09/06/2024)
09/13/2024	27	ORDER signed by JUDGE WILLIAM L. OSTEEEN, JR on 09/13/2024, that Defendant's Motion to Dismiss Complaint, (Doc. 20), is DENIED as MOOT. (cc) (Entered: 09/13/2024)
09/27/2024	28	RESPONSE in Opposition re 26 Memorandum filed by ROCKET MEDIA, LLC, 25 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM filed by ROCKET MEDIA, LLC filed by FULLTHROTTLE TECHNOLOGIES, LLC. Replies due by 10/11/2024 (BONELLA, MICHAEL) (Entered: 09/27/2024)
10/01/2024	29	Consent MOTION for Extension of Time to File Response/Reply as to 25 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM by ROCKET MEDIA, LLC. (Attachments: # 1 Text of Proposed Order)(DAGGER, KELLY) (Entered: 10/01/2024)
10/01/2024		Motion Referred to MAG/JUDGE JOI ELIZABETH PEAKE re: 29 Consent MOTION for Extension of Time to File Response/Reply as to 25 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM. (jd) (Entered: 10/01/2024)
10/04/2024	30	ORDER signed by MAG/JUDGE JOI ELIZABETH PEAKE on 10/04/2024, that the Motion [Doc. # 29] is GRANTED. The deadline to file a reply brief is hereby extended to and including October 18, 2024. (lg) (Entered: 10/04/2024)
10/18/2024	31	REPLY, filed by Defendant ROCKET MEDIA, LLC, to Response to 25 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM filed by ROCKET MEDIA, LLC. (DAGGER, KELLY) (Entered: 10/18/2024)
10/21/2024		Motion Submitted to JUDGE WILLIAM L. OSTEEEN, JR., re: 25 MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM. (jd) (Entered: 10/21/2024)

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