

**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. OSTEEN, 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**
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Fullthrottle Technologies, LLC
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V.

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Date Filed	#	Docket Text
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04/11/2024	<u>1</u>	COMPLAINT <i>for Patent Infringement</i> against Rocket Media, LLC (d/b/a Launch Labs) (Filing fee \$ 405 receipt number ANCMDC-3809496.), filed by FullThrottle Technologies, LLC. (Attachments: # <u>1</u> Exhibit A - U.S. Patent No. 11,556,947, # <u>2</u> Exhibit B - U.S. Patent No. 11,823,219, # <u>3</u> Exhibit C - Safari Privacy Overview - Learn how the Safari web browser protects your privacy (Nov. 2019), # <u>4</u> Exhibit D - Google Blogs - The next step toward phasing out third-party cookies in Chrome (Dec. 14, 2023), # <u>5</u> Exhibit E - Google Developers Third-party cookies restricted by default for 1% of Chrome user (Jan. 1, 2024), # <u>6</u> Exhibit F - Launch Labs Thriving in the Post-Third-Party Cookie Era (Feb. 2, 2024), # <u>7</u> Exhibit G - Tracking and Privacy Changes for Local Business: Capitalizing on the loss of Third-Party Cookies, # <u>8</u> Exhibit H - fullthrottle.ai Audience Generation, # <u>9</u> Exhibit I - Launch Labs Automotive, # <u>10</u> Exhibit J - Launch Labs Home, # <u>11</u> Exhibit K - Launch Labs API Docs, # <u>12</u> Exhibit L - atmain2.js JavaScript Computer Source Code taken from, # <u>13</u> Exhibit M - Launch Labs - Geolocation Marketing Demystified, # <u>14</u> Exhibit N - Launch Labs - Your First 90 Days with Ignite: A Guide to Success, # <u>15</u> Exhibit O - HTTP Headers Received by Launch Labs, # <u>16</u> Exhibit P - Launch Labs - Drive More Automotive Sales Leads From Interest to Conversion, # <u>17</u> Exhibit Q - Launch Labs Technology, # <u>18</u> Exhibit R - fullthrottle.ai Patent Announcement U.S. Patent No. 11,556,947, # <u>19</u> Exhibit S - fullthrottle.ai Patent Announcement U.S. Patent No. 11,823,219, # <u>20</u> Exhibit T - CF Search Marketing ShopperID, # <u>21</u> Exhibit U - Launch Labs - Atlanta Honda Dealership Case Study, # <u>22</u> Exhibit V - fullthrottle.ai Home Page, # <u>23</u> Civil Cover Sheet)(SHORES, ANDREW) (Entered: 04/11/2024)
04/11/2024	<u>2</u>	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	<u>3</u>	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	<u>4</u>	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	<u>6</u>	NOTICE of Special Appearance by attorney CORALEINE KITT on behalf of Plaintiff FULLTHROTTLE TECHNOLOGIES, LLC (Filing fee \$ 25 receipt number ANCMDC-3810904.) (Attachments: # <u>1</u> Certificate of Service)(KITT, CORALEINE) (Entered: 04/12/2024)
04/15/2024	<u>7</u>	Summons Issued as to ROCKET MEDIA, LLC. (cc) (Entered: 04/15/2024)
04/15/2024	<u>8</u>	Notice of Right to Consent. Counsel shall serve the attached form on all parties. (Attachments: # <u>1</u> Consent to Jurisdiction). (cc) (Entered: 04/15/2024)
04/17/2024	<u>9</u>	NOTICE of Special Appearance by attorney MICHAEL BONELLA on behalf of Plaintiff FULLTHROTTLE TECHNOLOGIES, LLC (Filing fee \$ 25 receipt number ANCMDC-3813089.) (Attachments: # <u>1</u> Certificate of Service)(BONELLA, MICHAEL) (Entered: 04/17/2024)
04/17/2024	<u>10</u>	NOTICE of Special Appearance by attorney AAKASH PATEL on behalf of Plaintiff FULLTHROTTLE TECHNOLOGIES, LLC (Filing fee \$ 25 receipt number ANCMDC-3813089.) (Attachments: # <u>1</u> Certificate of Service)(PATEL, AAKASH) (Entered: 04/17/2024)

		3813090.) (Attachments: # <u>1</u> Certificate of Service)(PATEL, AAKASH) (Entered: 04/17/2024)
04/18/2024	<u>11</u>	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	<u>12</u>	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	<u>13</u>	Corporate Disclosure Statement. (DAGGER, KELLY) (Entered: 04/18/2024)
04/18/2024	<u>14</u>	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	<u>15</u>	NOTICE of Attorney Appearance by attorney CHELSEA PIERONI on behalf of Defendant ROCKET MEDIA, LLC (PIERONI, CHELSEA) (Entered: 04/18/2024)
04/19/2024	<u>16</u>	Consent MOTION for Extension of Time to File Answer re: <u>1</u> Complaint, filed by ROCKET MEDIA, LLC. (Attachments: # <u>1</u> 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 <u>16</u> 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	<u>17</u>	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	<u>18</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint by ROCKET MEDIA, LLC. (Attachments: # <u>1</u> Text of Proposed Order) (DAGGER, KELLY) (Entered: 06/03/2024)
06/04/2024		Motion Submitted to MAG/JUDGE JOI ELIZABETH PEAKE., re: <u>18</u> Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint. (jd) (Entered: 06/04/2024)
06/06/2024	<u>19</u>	ORDER granting <u>18</u> 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	<u>20</u>	MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM by ROCKET MEDIA, LLC. Response to Motion due by 7/5/2024 (Attachments: # <u>1</u> Exhibit 1 - Amendments to Claims, U.S. Patent & Trademark Office Prosecution History for Application No. 17/687,992, # <u>2</u> 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	<u>21</u>	<i>Supporting</i> BRIEF re <u>20</u> 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	<u>22</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>20</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM <i>and for Order Setting Briefing Schedule</i> by FULLTHROTTLE TECHNOLOGIES, LLC. (Attachments: # <u>1</u> Text of Proposed Order)(SHORES, ANDREW) (Entered: 06/25/2024)

06/25/2024		Motion Referred to MAG/JUDGE JOI ELIZABETH PEAKE re: <u>22</u> Consent MOTION for Extension of Time to File Response/Reply as to <u>20</u> 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	<u>23</u>	ORDER signed by MAG/JUDGE JOI ELIZABETH PEAKE on 07/02/2024, that the Motion [Doc. # <u>22</u>] 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	<u>24</u>	First AMENDED COMPLAINT <i>for Patent Infringement</i> against defendant ROCKET MEDIA, LLC, filed by FULLTHROTTLE TECHNOLOGIES, LLC. (Attachments: # <u>1</u> Ex. A. - U.S. Patent No. 11,556,947, # <u>2</u> Ex. B - U.S. Patent No. 11,823,219, # <u>3</u> Ex. C - U.S. Patent No. 12,051,083, # <u>4</u> Ex. D - Safari Privacy Whitepaper Nov. 2019, # <u>5</u> Ex. E - Google Blogs - The next step toward phasing out third-party cookies in Chrome (Dec. 14, 2023), # <u>6</u> Ex. F - Third-party cookies restricted by default for 1% of Chrome user (Jan. 1, 2024), # <u>7</u> Ex. G - Launch Labs Thriving in the Post-Third-Party Cookie Era (Feb. 2, 2024), # <u>8</u> Ex. H - Tracking and Privacy Changes for Local Business: Capitalizing on the loss of Third-Party Cookies, # <u>9</u> Ex. I - fullthrottle.ai Audience Generation, # <u>10</u> Ex. J. - Launch Labs Automotive, # <u>11</u> Ex. K - Launch Labs Home, # <u>12</u> Ex. L - Launch Labs - API Docs, # <u>13</u> Ex. M - JavaScript Computer Source Code taken from https://www.launchlabs.ai/ on March 5, 2024, # <u>14</u> Ex. N - Launch Labs - Geolocation Marketing Demystified, # <u>15</u> Ex. O - Launch Labs - Your First 90 Days with Ignite: A Guide to Success, # <u>16</u> Ex. P - HTTP Headers Received by Launch Labs, # <u>17</u> Ex. Q - Launch Labs - Drive More Automotive Sales Leads From Interest to Conversion, # <u>18</u> Ex. R - Launch Labs Technology, # <u>19</u> Ex. S - fullthrottle.ai Patent Announcement U.S. Patent No. 11,556,947, # <u>20</u> Ex. T - fullthrottle.ai Patent Announcement U.S. Patent No. 11,823,219, # <u>21</u> Ex. U - CF Search Marketing ShopperID, # <u>22</u> Ex. V - Launch Labs - Atlanta Honda Dealership Case Study, # <u>23</u> Ex. W - fullthrottle.ai Home Page, # <u>24</u> Ex. X - Launch Labs Marketing in the Age of Intelligence)(BONELLA, MICHAEL) (Entered: 08/07/2024)
09/06/2024	<u>25</u>	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	<u>26</u>	MEMORANDUM filed by Defendant ROCKET MEDIA, LLC re <u>25</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM filed by ROCKET MEDIA, LLC. (DAGGER, KELLY) (Entered: 09/06/2024)
09/13/2024	<u>27</u>	ORDER signed by JUDGE WILLIAM L. OSTEEN, JR on 09/13/2024, that Defendant's Motion to Dismiss Complaint, (Doc. <u>20</u>), is DENIED as MOOT. (cc) (Entered: 09/13/2024)
09/27/2024	<u>28</u>	RESPONSE in Opposition re <u>26</u> Memorandum filed by ROCKET MEDIA, LLC, <u>25</u> 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	<u>29</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>25</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM by ROCKET MEDIA, LLC. (Attachments: # <u>1</u> Text of Proposed Order)(DAGGER, KELLY) (Entered: 10/01/2024)
10/01/2024		Motion Referred to MAG/JUDGE JOI ELIZABETH PEAKE re: <u>29</u> Consent MOTION for Extension of Time to File Response/Reply as to <u>25</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM. (jd) (Entered: 10/01/2024)
10/04/2024	<u>30</u>	ORDER signed by MAG/JUDGE JOI ELIZABETH PEAKE on 10/04/2024, that the Motion [Doc. # <u>29</u>] 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	<u>31</u>	REPLY, filed by Defendant ROCKET MEDIA, LLC, to Response to <u>25</u> 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. OSTEEN, JR., re: <u>25</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM. (jd) (Entered: 10/21/2024)

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