UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GLOBAL EQUITY MANAGE MENT (SA) PTY. LTD., Plaintiff,	)	
	)	**Civil Action No. 2:16-cv-00637**
v.	)	
ZILLOW, INC. AND ZILLOW GROUP, INC. Defendants.	)	

PLAINTIFF'S FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Global Equity Management (SA) Pt. Ltd. ("GEMSA") files this First Amended Complaint and demand for jury trial seeking relief from patent infringement by Zillow, Inc. and Zillow Group, Inc. (collectively referred to as "Zillow"), Amazon Web Services, Inc. and VADATA, Inc. (collectively "Amazon") (Zillow and Amazon collectively referred to as "Defendants"), alleging as follows:

THE PARTIES

1. Plaintiff GEMSA is a foreign corporation organized under the laws of Australia, with its principal place of business located 458 Morphett Road, Warradale, South Australia 5046.

2. Defendants are as follows:

a. Zillow, Inc. is a corporation, with its principal place of business located at 999 Third Avenue, Suite 4600, Seattle, Washington 98104 and may be served with process through the Texas Secretary of State's Office. Zillow Group, Inc. is a corporation, with its principal place of business located at 999 Third Avenue, Suite 4600, Seattle, Washington 98104 and may be served with process through the Texas Secretary of State's Office.

b. Amazon Web Services, Inc. is a corporation organized under the laws of the state of Delaware, with a principal place of business at 410 Terry Avenue North, Seattle, WA 98109-5210, and may be served with process at Corporation Service Company, 2711 Centerville Rd Suite 400, Wilmington, DE 19808.

c. VADATA, Inc. (collectively Amazon Web Services, Inc. and VADATA, Inc. are referred to as "Amazon") is a corporation organized under the laws of the state of Delaware, with a principal place of business at 410 Terry Avenue North, Seattle, WA 98109-5210, and may be served with process at Corporation Service Company, 2711 Centerville Rd Suite 400, Wilmington, DE 19808.

JURISDICTION AND VENUE

3. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 et. seq. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendants because: Defendants are present within or have minimum contacts within the State of Texas and this judicial district; Defendants have purposefully availed themselves of the privileges of conducting business in the State of Texas and in this judicial district; Defendants each regularly conduct business within the State of Texas and within this judicial district; and Plaintiff's cause of action arises directly from each Defendants' business contacts and other activities in the State of Texas and in this judicial district.

5. Upon information and belief, Defendants conduct 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 Texas.

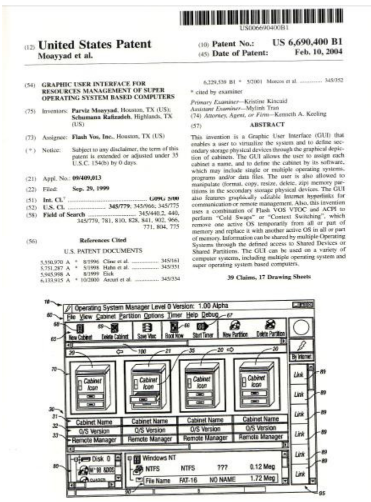
Summary of Case for Infringement

6. ZILLOW, through zillow.com or one of its websites linked directly or indirectly thereto, accesses websites, data, data centers and the like owned or controlled by Amazon, through Amazon Web Services ("AWS") as illustrated at https://aws.amazon.com/solutions/case-studies/zillow/. The use of zillow.com, or one of its websites linked directly or indirectly thereto, and AWS infringes one or more claims of United States Patent No. 6,690,400 ("the '400 patent") and United States Patent No. 7,356,677 ("the '677 patent") (collectively the "Patents-in-Suit").

Background of the Invention

7. Flash Vos, Inc. (FVOS), a predecessor of GEMSA, was established in 1997 in Houston, Texas, to develop platform independent information processing in complex environments with multiple systems and multiple operating environments. FVOS product development created and produced the first Virtual System OS (VOS) and the first Super Operating System (SOS) that were well ahead of times. The SOS for the first time allowed multiple operating environment to co-exist on the same platform with their own independent filesystems and was operating system independent.

8. Flash Vos, Inc. moved the computer industry a quantum leap forwarded in the late 90's when it invented Systems Virtualization and was awarded the patents US6690400 ('400), US7356677 ('677) and US6401183 ('183).


US006690400B1

(12) United States Patent
Moayyad et al.

(10) Patent No.: US 6,690,400 B1
(45) Date of Patent: Feb. 10, 2004

(54) GRAPHIC USER INTERFACE FOR RESOURCES MANAGEMENT OF SUPER OPERATING SYSTEM BASED COMPUTERS

(75) Inventors: Parviz Moayyad, Houston, TX (US); Schumann Rafizadeh, Highlands, TX (US)

(73) Assignee: Flash Vos, Inc., Houston, TX (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: 09/409,013

(22) Filed: Sep. 29, 1999

(51) Int. Cl.[7] G09G 5/00
(52) U.S. Cl. 345/779; 345/966; 345/775
(58) Field of Search 345/440.2, 440, 345/779, 781, 810, 828, 841, 902, 966, 771, 804, 775

(56) References Cited

U.S. PATENT DOCUMENTS

5,550,970 A * 8/1996 Cline et al. 345/161
5,751,287 A * 5/1998 Hahn et al. 345/351
5,945,998 A 8/1999 Eick
6,133,915 A * 10/2000 Arcuri et al. 345/334
6,229,539 B1 * 5/2001 Morcos et al. 345/352

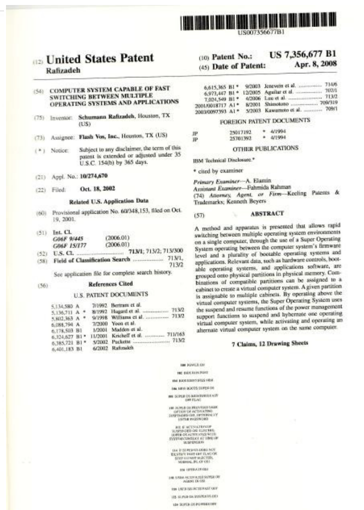
* cited by examiner

Primary Examiner—Kristine Kincaid
Assistant Examiner—Mylinh Tran
(74) Attorney, Agent, or Firm—Kenneth A. Keeling

(57) ABSTRACT

This invention is a Graphic User Interface (GUI) that enables a user to virtualize the system and to define secondary storage physical devices through the graphical depiction of cabinets. The GUI allows the user to assign each cabinet a name, and to define the cabinet by its software, which may include single or multiple operating systems, programs and/or data files. The user is also allowed to manipulate (format, copy, resize, delete, zip) memory partitions in the secondary storage physical devices. The GUI also features graphically editable Internet hyperlinks for communication or remote management. Also, this invention uses a combination of Flash VOS VTOC and ACPI to perform "Cold Swaps" or "Context Switching", which remove one active OS temporarily from all or part of memory and replace it with another active OS in all or part of memory. Information can be shared by multiple Operating Systems through the defined access to Shared Devices or Shared Partitions. The GUI can be used on a variety of computer systems, including multiple operating system and super operating system based computers.

39 Claims, 17 Drawing Sheets


US007356677B1

(12) United States Patent
Rafizadeh

(10) Patent No.: US 7,356,677 B1
(45) Date of Patent: Apr. 8, 2008

(54) COMPUTER SYSTEM CAPABLE OF FAST SWITCHING BETWEEN MULTIPLE OPERATING SYSTEMS AND APPLICATIONS

(75) Inventor: Schumann Rafizadeh, Houston, TX (US)

(73) Assignee: Flash Vos, Inc., Houston, TX (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 365 days.

(21) Appl. No.: 10/274,670

(22) Filed: Oct. 18, 2002

Related U.S. Application Data

(60) Provisional application No. 60/348,153, filed on Oct. 19, 2001.

(51) Int. Cl.
G06F 9/445 (2006.01)
G06F 15/177 (2006.01)
(52) U.S. Cl. 713/1; 713/2; 713/300
(58) Field of Classification Search 713/1, 713/2
See application file for complete search history.

(56) References Cited

U.S. PATENT DOCUMENTS

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5,802,363 A * 9/1998 Williams et al. 713/2
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FOREIGN PATENT DOCUMENTS

JP 25017192 * 4/1994
JP 25701392 * 4/1994

OTHER PUBLICATIONS

IBM Technical Disclosure.*

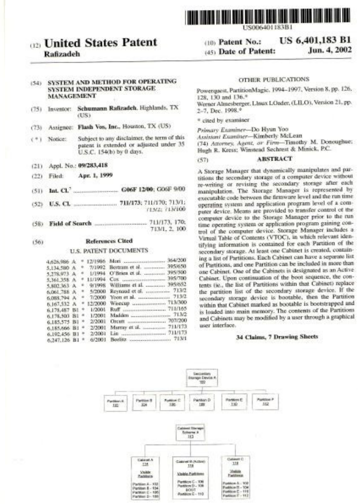
* cited by examiner

Primary Examiner—A. Elamin
Assistant Examiner—Fahmida Rahman
(74) Attorney, Agent, or Firm—Keeling Patents & Trademarks; Kenneth Beyers

(57) ABSTRACT

A method and apparatus is presented that allows rapid switching between multiple operating system environments on a single computer, through the use of a Super Operating System operating between the computer system's firmware level and a plurality of bootable operating systems and applications. Relevant data, such as hardware controls, bootable operating systems, and applications software, are grouped onto physical partitions in physical memory. Combinations of compatible partitions can be assigned to a cabinet to create a virtual computer system. A given partition is assignable to multiple cabinets. By operating above the virtual computer systems, the Super Operating System uses the suspend and resume functions of the power management support functions to suspend and hybernate one operating virtual computer system, while activating and operating an alternate virtual computer system on the same computer.

7 Claims, 12 Drawing Sheets


US006401183B1

(12) United States Patent
Rafizadeh

(10) Patent No.: US 6,401,183 B1
(45) Date of Patent: Jun. 4, 2002

(54) SYSTEM AND METHOD FOR OPERATING SYSTEM INDEPENDENT STORAGE MANAGEMENT

(75) Inventor: Schumann Rafizadeh, Highlands, TX (US)

(73) Assignee: Flash Vos, Inc., Houston, TX (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: 09/283,418

(22) Filed: Apr. 1, 1999

(51) Int. Cl.[7] G06F 12/00; G06F 9/00
(52) U.S. Cl. 711/173; 711/170; 713/1; 713/2; 713/100
(58) Field of Search 711/173, 170; 713/1, 2, 100

(56) References Cited

U.S. PATENT DOCUMENTS

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5,278,973 A * 1/1994 O'Brien et al. 395/500
5,361,358 A * 11/1994 Cox 395/700
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6,088,794 A * 7/2000 Yoon et al. 713/2
6,167,532 A * 12/2000 Wisecup 713/300
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Powerquest, PartitionMagic, 1994–1997, Version 8, pp. 126, 128, 130 and 136.*
Werner Almesberger, LInux LOader, (LILO), Version 21, pp. 2–7, Dec. 1998.*

* cited by examiner

Primary Examiner—Do Hyun Yoo
Assistant Examiner—Kimberly McLean
(74) Attorney, Agent, or Firm—Timothy M. Donoughue; Hugh R. Kress; Winstead Sechrest & Minick, P.C.

(57) ABSTRACT

A Storage Manager that dynamically manipulates and partitions the secondary storage of a computer device without re-writing or revising the secondary storage after each manipulation. The Storage Manager is represented by executable code between the firmware level and the run time operating system and application program level of a computer device. Means are provided to transfer control of the computer device to the Storage Manager prior to the run time operating system or application program gaining control of the computer device. Storage Manager includes a Virtual Table of Contents (VTOC), in which relevant identifying information is contained for each Partition of the secondary storage. At least one Cabinet is created, containing a list of Partitions. Each Cabinet can have a separate list of Partitions, and one Partition can be included in more than one Cabinet. One of the Cabinets is designated as an Active Cabinet. Upon continuation of the boot sequence, the contents (ie., the list of Partitions within that Cabinet) replace the partition list of the secondary storage device. If the secondary storage device is bootable, then the Partition within that Cabinet marked as bootable is bootstrapped and is loaded into main memory. The contents of the Partitions and Cabinets may be modified by a user through a graphical user interface.

34 Claims, 7 Drawing Sheets

9. Technology Experts recognized the Virtualization innovations as key technology inventions. Before the SOS, computers were only able to use a single operating system and virtualization of computers based on storage was not possible. The technology has been cited numerous times by the patent office as relevant prior art for other later patent applications.

US7996687	31 Oct 2008	9 Aug 2011	International Business Machines Corporation	Product for providing a scalable trusted platform module in a hypervisor environment
US8010513	28 May 2010	30 Aug 2011	Brocade Communications Systems, Inc.	Use of server instances and processing elements to define a server
US8091042 *	15 Nov 2001	3 Jan 2012	Siebel Systems, Inc.	Apparatus and method for displaying selectable icons in a toolbar for a user interface
US8150972	10 Feb 2011	3 Apr 2012	Adaptive Computing Enterprises, Inc.	System and method of providing reservation masks within a compute environment
US8176094	1 Jun 2009	8 May 2012	Novell, Inc.	System and method for efficiently building virtual appliances in a hosted environment
US8209288	1 Jun 2009	26 Jun 2012	Novell, Inc.	System and method for inspecting a virtual appliance runtime environment
US8209495	28 Mar 2011	26 Jun 2012	Hitachi, Ltd.	Storage management method and storage management system
US8214842 *	27 Feb 2009	3 Jul 2012	International Business Machines Corporation	Visualization-centric performance-based volume allocation
US8321871	17 Jun 2005	27 Nov 2012	Adaptive Computing Enterprises, Inc.	System and method of using transaction IDS for managing reservations of compute resources within a compute environment
US8386721	21 Nov 2008	26 Feb 2013	Hitachi, Ltd.	Storage having logical partitioning capability and systems which include the storage
US8412909 *	7 Apr 2010	2 Apr 2013	Samsung Electronics Co., Ltd.	Defining and changing spare space and user space in a storage apparatus
US8413155	11 Mar 2005	2 Apr 2013	Adaptive Computing Enterprises, Inc.	System and method for a self-optimizing reservation in time of compute resources
US8418186	27 Jun 2011	9 Apr 2013	Adaptive Computing Enterprises, Inc.	System and method of co-allocating a reservation spanning different compute resources types
US8423884	8 Dec 2011	16 Apr 2013	Institute For Information Industry	System, method and computer readable storage medium for storing the method for operating graphic user interface
US8499276 *	28 Dec 2006	30 Jul 2013	Ca, Inc.	Multi-platform graphical user interface
US8516217 *	27 Mar 2009	20 Aug 2013	International Business Machines Corporation	Managing a logically partitioned computing system through a virtual file system
US8543998	11 Feb 2009	24 Sep 2013	Oracle International Corporation	System and method for building virtual appliances using a repository metadata server and a dependency resolution service
US8544016	1 Jun 2009	24 Sep 2013	Oracle International Corporation	Rebuilding a first and second image based on software components having earlier versions for one or more appliances and performing a first and second integration test for each respective image in a runtime environment
			Adaptive	

REFERENCED BY

Citing Patent	Filing date	Publication date	Applicant	Title
US6971002 *	9 Aug 2001	29 Nov 2005	International Business Machines Corporation	Method, system, and product for booting a partition using one of multiple, different firmware images without rebooting other partitions
US7062629 *	15 Feb 2005	13 Jun 2006	Hitachi, Ltd.	Apparatus and method for partitioning and managing subsystem logics
US7065627 *	25 Mar 2002	20 Jun 2006	International Business Machines Corporation	Method and system for providing an event driven image for a boot record
US7069408 *	9 Dec 2003	27 Jun 2006	Hitachi, Ltd.	Apparatus and method for partitioning and managing subsystem logics
US7103847 *	18 Jul 2002	5 Sep 2006	International Business Machines Corporation	Method and system for monitoring the use of a resource in a processing system
US7127585	23 Jun 2004	24 Oct 2006	Hitachi, Ltd.	Storage having logical partitioning capability and systems which include the storage
US7146569 *	10 Oct 2002	5 Dec 2006	International Business Machines Corporation	Method, apparatus, and program for visual representation of an address space
US7181577	19 Feb 2004	20 Feb 2007	Hitachi, Ltd.	Storage having logical partitioning capability and systems which include the storage
US7185142	20 May 2004	27 Feb 2007	Hitachi, Ltd.	Storage management method and storage management system
US7287129	17 May 2006	23 Oct 2007	Hitachi, Ltd.	Storage management method and storage management system
US7317175	24 Jun 2004	8 Jan 2008	Jere F. Irwin	User interface for configuring and controlling an array of heater elements
US7346585 *	28 Feb 2003	18 Mar 2008	Microsoft Corporation	Computer software and services license processing method and system
US7356770 *	8 Nov 2005	8 Apr 2008	Cluster Resources, Inc.	System and method of graphically managing and monitoring a compute environment
US7363455	15 Feb 2005	22 Apr 2008	Hitachi, Ltd.	Apparatus and method for partitioning and managing subsystem logics
US7415578	20 Mar 2007	19 Aug 2008	Hitachi, Ltd.	Storage management method and storage management system
US7478246 *	29 Jul 2004	13 Jan 2009	International Business Machines Corporation	Method for providing a scalable trusted platform module in a hypervisor environment
US7546426	21 Dec 2006	9 Jun 2009	Hitachi, Ltd.	Storage having a logical partitioning capability and systems which include the storage
US7590648 *	27 May 2005	15 Sep 2009	Brocade Communications Systems, Inc.	Template-based development of servers
US7624283	13 Feb 2006	24 Nov 2009	International Business Machines Corporation	Protocol for trusted platform module recovery through context checkpointing
US7917704	25 Jul 2008	29 Mar 2011	Hitachi, Ltd.	Storage management method and storage management system

10. Additionally, GEMSA has continued supporting these technologies advances and has helped the achievement of additional patents awarded in China which include:

CN201010149051 **Firmware-based flash memory array management device and method independent of operating system**
CN200810204083 **Operating system switching method based on expandable firmware interface**
CN200810200121 **Virtual platform system based on firmware**
CN200710132636 **Perspective communication method between super operating system and its intermedium**
CN200910197256 **Cross-platform and cross-processor method based on extensible firmware interface and device**

11. These GEMSA creative achievements not only revolutionized the development of virtualization technology for support of multiple operating systems but also helped the development of internet advertising and information accessing from multiple data sources.

12. One of the key features of these innovations is the method of accessing additional relevant information from the GUI by simply clicking on the information links positioned on the right hand side of the GUI.

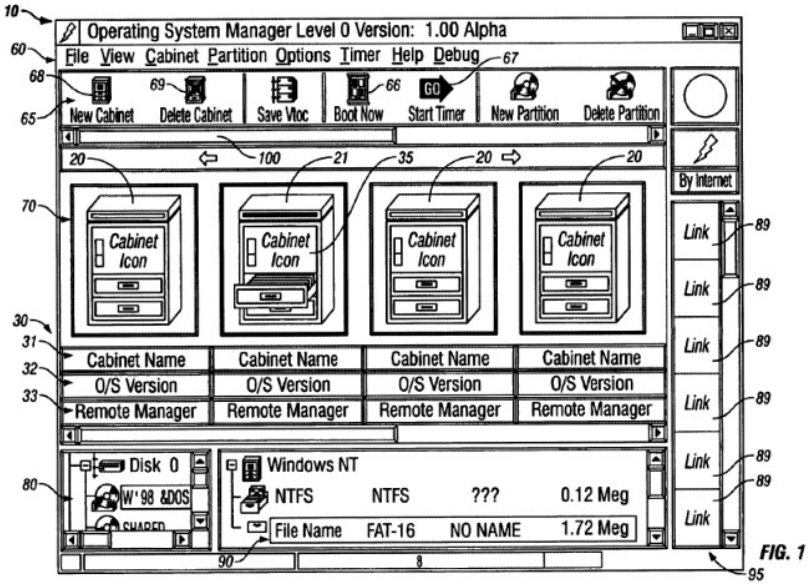


Fig.1 of GEMSA '400 GUI Patent

13. These GUI innovations include Menu Bars and Links are marked (65, 89, etc.) and shown in the Fig.1 of the '400 patent and one embodiment of this invention is further illustrated as figure 8 in '677 patent.

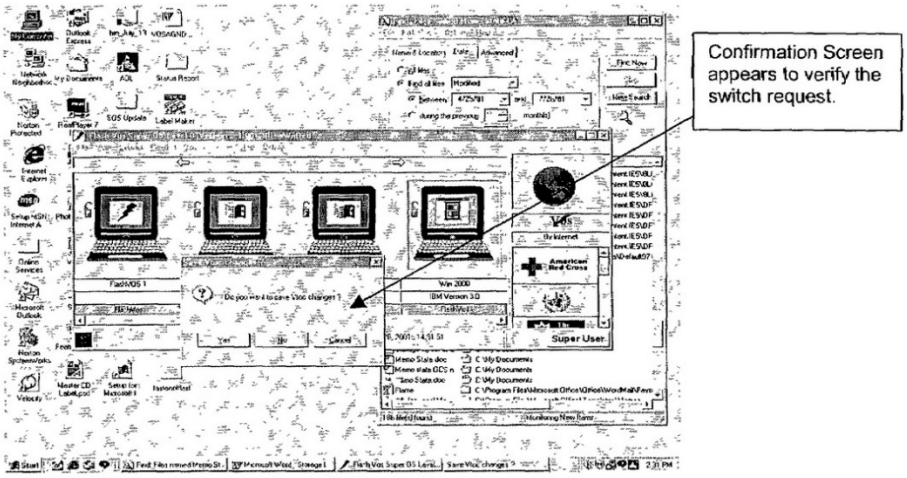
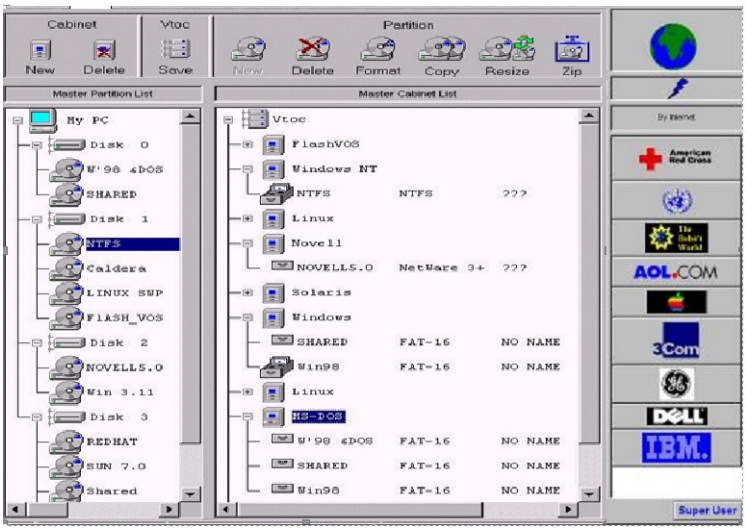


Figure 8 of GEMSA US 7356677 B1 Patent

14. Figure below is another instance of GEMSA GUI from copyrighted SOS User's Guide.



COUNT 1: INFRINGEMENT OF THE '400 PATENT

15. Plaintiff re-alleges paragraphs 1-14 in its entirety.

16. On February 10, 2004, United States Patent No. 6,690,400 ("the '400 patent") entitled "Graphic User Interface for Resources Management of Super Operating System Based Computers" was duly and legally issued by the United States Patent and Trademark Office. GEMSA owns the '400 patent by assignment. (the '400 patent is attached as Ex. A)

17. ZILLOW uses a website with a graphical user interface ("GUI") for the administration and management of www.Zillow.com or one of its websites linked directly or indirectly thereto through aws.amazon.com, or one of its websites linked directly or indirectly thereto owned by Amazon, that infringes one or more claims of the '400 patent, including at least claims 1, 2, 16, and 28.

18. In doing so Defendants infringe at least claim 1 of the '400 patent, literally or under the doctrine of equivalents. Zillow directly infringes by using the GUI for the administration and management of Zillow.com or one of its websites linked directly or indirectly thereto through aws.amazon.com, or one of its websites linked directly or indirectly thereto. Amazon directly infringes by using a GUI for the administration and management of aws.amazon.com or one of its websites linked directly or indirectly thereto. Defendants induce infringement by consumers and advertisers by encouraging them to use their respective GUI(s). Defendants contributorily infringe by providing the GUI(s) to consumers and advertisers.

19. On information and belief, Defendants will continue to infringe at least claim 1 of the '400 patent unless and until it is enjoined by this Court.

20. Defendants have caused and will continue to cause GEMSA irreparable injury and damage by infringing at least claims 1, 2, 16, and 28 of the '400 patent. GEMSA will suffer further irreparable injury, for which it has no adequate remedy at law, unless and until Defendants are enjoined from infringing at least claims 1, 2, 16, and 28 of the '400 patent.

21. On information and belief, such infringement is willful, intentional and in reckless disregard of GEMSA's rights, entitling GEMSA to treble damages.

COUNT 2: INFRINGEMENT OF THE '677 PATENT

22. Plaintiff re-alleges paragraphs 1-21 in its entirety.

23. On April 8, 2008, United States Patent No. 7,356,677 ("the ‘677 patent") entitled "Computer System Capable of Fast Switching Between Multiple Operating Systems and Applications" was duly and legally issued by the United States Patent and Trademark Office. GEMSA owns the '677 patent by assignment. (the ‘677 patent is attached as Ex. B)

24. ZILLOW uses a website with a graphical user interface (“GUI”) for the administration and management of www.Zillow.com or one of its websites linked directly or indirectly thereto through aws.amazon.com, or one of its websites linked directly or indirectly thereto owned by Amazon that infringes at least claims 1, 3 and 6 of the ‘677 patent.

25. In doing so Defendants infringe at least claims 1, 3 and 6 of the ‘677 patent, literally or under the doctrine of equivalents. Zillow directly infringes by using the GUI for the administration and management of Zillow.com or one of its websites linked directly or indirectly thereto. Amazon directly infringes by using the GUI for the administration and management of aws.amazon.com or one of its websites linked directly or indirectly thereto. Defendants induce infringement by consumers and advertisers by encouraging them to use their respective GUI(s). Defendants contributorily infringe by providing the GUI(s) to consumers and advertisers.

26. On information and belief, Defendants will continue to infringe at least claims 1, 3 and 6 of the ‘677 patent unless and until it is enjoined by this Court.

27. Defendants have caused and will continue to cause GEMSA irreparable injury and damage by infringing at least claims 1, 3 and 6 of the ‘677 patent. GEMSA will suffer further irreparable injury, for which it has no adequate remedy at law, unless and until Defendants are enjoined from infringing at least claims 1, 3 and 6 of the ‘677 patent.

28. On information and belief, such infringement is willful, intentional and in reckless disregard of GEMSA’s rights entitling GEMSA to treble damages.

PRAYER FOR RELIEF

WHEREFORE, GEMSA respectfully requests that this Court:

1. Enter judgment that Defendants have willfully infringed the '400 patent;

2. Enter an order permanently enjoining Defendants and their officers, agents, employees, Attorneys, and all persons in active conceit or participation with any of them, from infringing the '400 patent;

3. Award GEMSA damages in an amount sufficient to compensate it for Defendants' infringement of the '400 patent, together with prejudgment and post-judgment interest and costs under 35 U.S.C. § 284;

4. Enter judgment that Defendants have willfully infringed the '677 patent;

5. Enter an order permanently enjoining Defendants and their officers, agents, employees, Attorneys, and all persons in active conceit or participation with any of them, from infringing the '677 patent;

6. Award GEMSA damages in an amount sufficient to compensate it for Defendants' infringement of the '677 patent, together with prejudgment and post-judgment interest and costs under 35 U.S.C. § 284;

7. Award GEMSA 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;

8. Declare this case to be "exceptional" under 35 U.S.C. § 285 and award GEMSA its attorneys' fees, expenses, and costs incurred in this action; and,

9. Award GEMSA such other and further relief as this Court deems just and proper.

JURY DEMAND

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

Respectfully submitted,

Ramey & Schwaller, LLP

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Attorneys for GEMSA

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in this case are being served today, July 28, 2016, with a copy of the foregoing via the Court's CM/ECF system. For any party who has not entered an appearance a copy will be served when such appearance is made.

/s/ William P. Ramey, III
William P. Ramey, III