

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

<b>NETSOC, LLC,</b>	)	
<i>Plaintiff,</i>	)	
	)	<b>Civil Action No. _____</b>
<b>v.</b>	)	
	)	
<b>LINKEDIN CORPORATION</b>	)	<b>JURY TRIAL DEMANDED</b>
<i>Defendant.</i>	)	

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

NetSoc, LLC (“NetSoc”) files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,978,107 and U.S. Patent No. 7,565,344 by LinkedIn, alleging as follows:

**I. THE PARTIES**

1. Plaintiff NetSoc is a Texas Limited Liability Company with its principal place of business located in Harris County, Texas.

2. On information and belief, LinkedIn Corp. (“LinkedIn”) is a domestic corporation organized and existing under the laws of Delaware, with a principal place of business located in New York City, New York. LinkedIn may be served through its registered agent at Corporation Service Company, 80 State Street, Albany, New York, 12207. On information and belief, LinkedIn sells and offers to sell products and services throughout New York State, 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 State and this judicial district.

## 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.

4. This Court also has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. § 1332(a)(1) because Plaintiff is a limited liability company organized under the laws of the State of Texas and Defendant is a Delaware Corporation with a physical place of business located in New York, New York. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. 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.

6. 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.<sup>1</sup> 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

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<sup>1</sup> LinkedIn, Ltd. maintains offices in the Empire State Building at 350 Fifth Avenue, New York, New York.

deriving substantial revenue from goods and services provided to individuals in New York and this District.

**III. INFRINGEMENT ('107 Patent)**

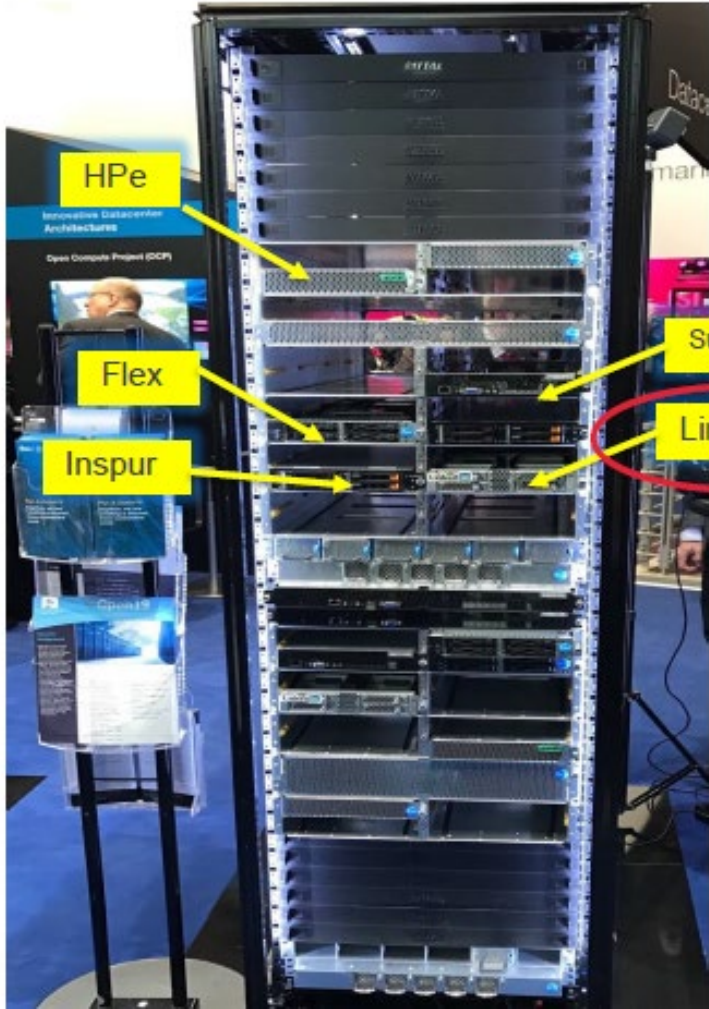
7. On May 22, 2018, U.S. Patent No. 9,978,107 (“the ’107 patent”, attached as Exhibit A) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ’107 patent by assignment.

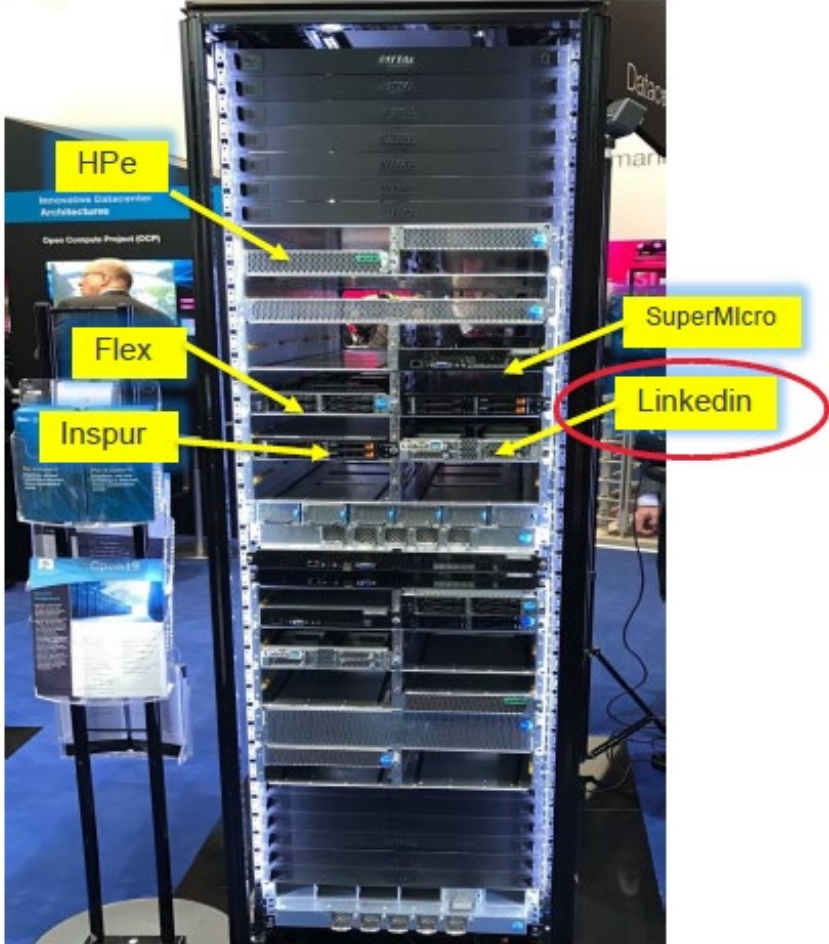
8. The ’107 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.



9. LinkedIn maintains, operates, and administers a website at www.Linkedin.com that infringes one or more claims of the ‘107 patent, including at least claims 1-11, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘107 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.

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

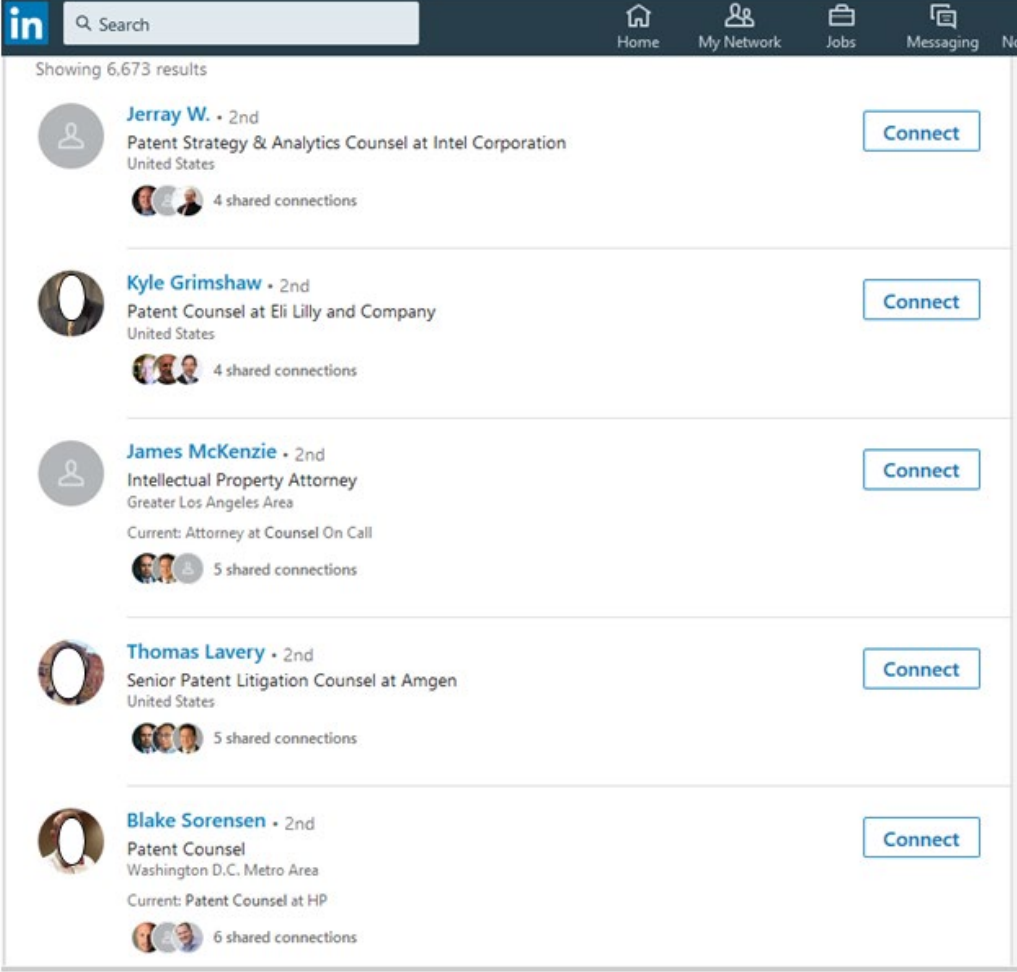
<b>Exemplary Claim 6</b>	<b>Accused Product (or Service)</b>
6. A computer system comprising:	Plaintiff contends that LinkedIn has deployed one or more servers or computer system for providing its products or services such as LinkedIn Talent Solutions (for Recruiter, Recruiter Lite, etc.).

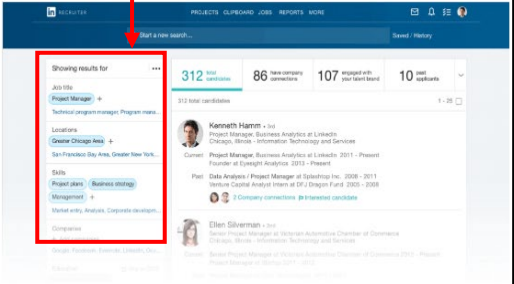
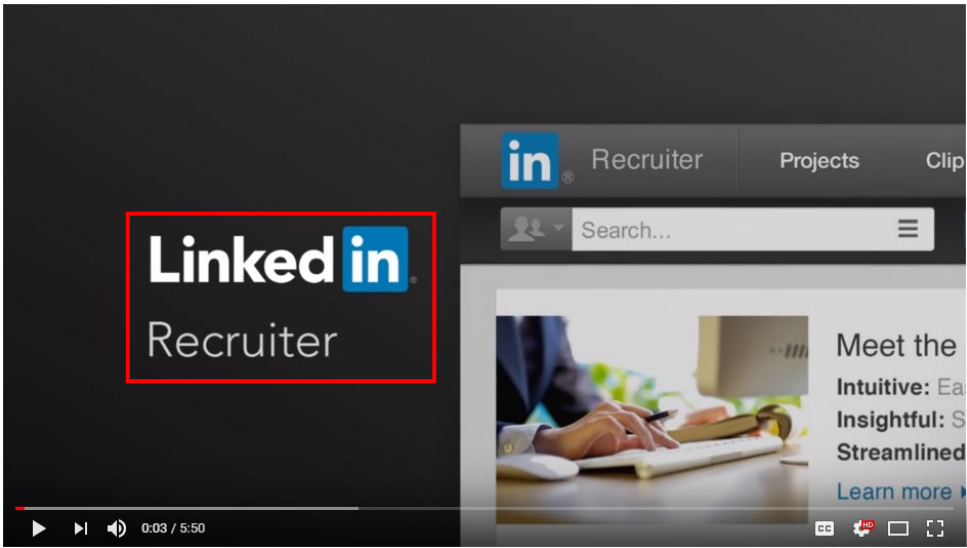
Exemplary Claim 6	Accused Product (or Service)
	 <p data-bbox="402 1310 1243 1346"><b>Attachment 1 (LinkedIn Open19 Deep Dive (2017)) at 8 of 28.</b></p> <p data-bbox="521 1362 878 1409"><b>Servers</b> in design</p> <ul data-bbox="526 1444 1325 1738" style="list-style-type: none"> <li>• Dell, HPe, SuperMicro, Flex, Celestica and Inspur are actively working on Open19 server</li> <li>• White boxes in development by <b>LinkedIn</b>:             <ul data-bbox="570 1562 1252 1661" style="list-style-type: none"> <li>• Quad socket Broadwell-DE in a half width 1RU (brick)</li> <li>• Dual socket High-end Skylake with up to <b>1.5T memory</b> in 1RU</li> <li>• <b>Storage Servers</b> – Single socket up to 32 drives per 1RU</li> </ul> </li> <li>• One clarification about the high density solution – To get to the full capacity (96 @ 19.2Kw) the core count will only be 3000</li> </ul> <p data-bbox="402 1761 602 1793"><b>Id.</b> at 14 of 28.</p>

Exemplary Claim 6	Accused Product (or Service)
<p>a memory to store a list comprising a plurality of participants, wherein each participant in the plurality of participants corresponds to one or more individuals, wherein the list also includes information associated with at least one of each participant or the one or more individuals that correspond to each participant;</p> <p>one or more processors that execute instructions to:</p> <p>maintain the list;</p>	<p>Plaintiff contends that by using servers or databases (which include processors and memory), LinkedIn stores and maintains data of one or more participants or individuals along with their information.</p>  <p><b>Attachment 1 (LinkedIn Open19 Deep Dive (2017)) at 8 of 28.</b></p> <p><b>Servers</b> in design</p> <ul style="list-style-type: none"> <li>• Dell, HPe, SuperMicro, Flex, Celestica and Inspur are actively working on Open19 server</li> <li>• White boxes in development by <b>LinkedIn</b>:             <ul style="list-style-type: none"> <li>• Quad socket Broadwell-DE in a half width 1RU (brick)</li> <li>• Dual socket High-end Skylake with up to <b>1.5T memory</b> in 1RU</li> <li>• <b>Storage Servers</b> – Single socket up to 32 drives per 1RU</li> </ul> </li> <li>• One clarification about the high density solution – To get to the full capacity (96 @ 19.2Kw) the core count will only be 3000</li> </ul>

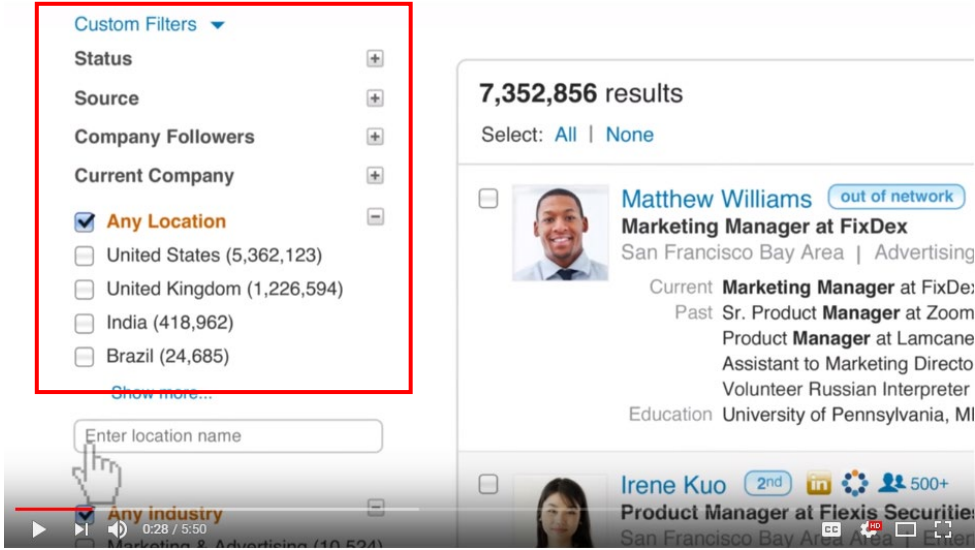






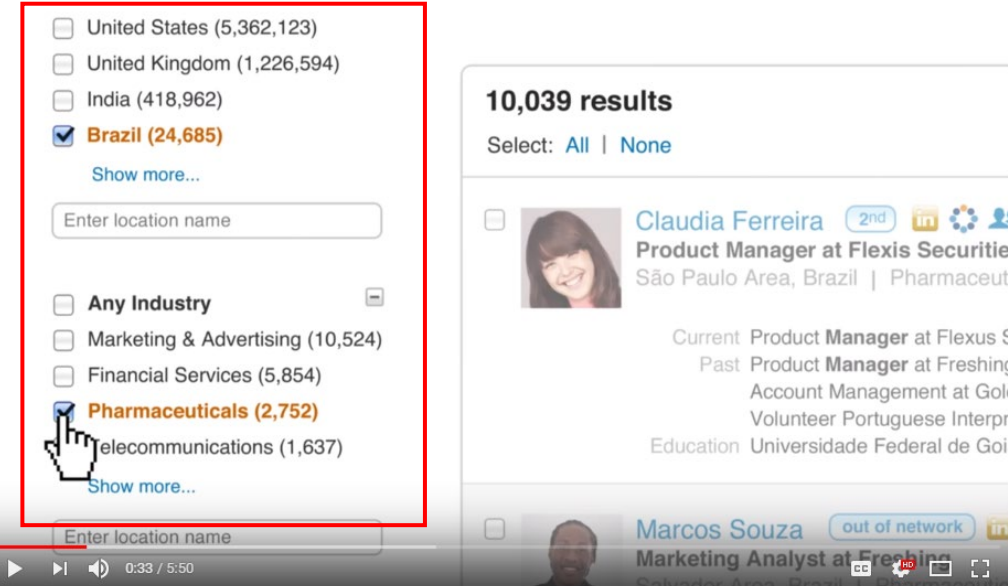







Exemplary Claim 6	Accused Product (or Service)
	<p><i>Id.</i> at 14 of 28.</p>  <p>LEVERAGE EXISTING <b>SERVERS</b></p> <p>Bricks form factor fit most existing <b>motherboards</b></p> <p><i>Id.</i> at 18 of 28.</p> <h2 style="background-color: #005596; color: white; padding: 5px;">LinkedIn Deployment Model</h2> <p style="text-align: center;">---</p> <p><b>Server</b> Integration</p> <ul style="list-style-type: none"> <li>• <b>Insertion of servers on demand</b></li> <li>• Fully automated provisioning and deployment</li> <li>• <b>Deploy 1000s of servers</b> in days not months</li> <li>• Create an elastic data center model with fix low cost infra</li> </ul> <p><i>Id.</i> at 21 and 23 of 28.</p>  <p>LinkedIn stores and maintains data of millions of candidates or participants.</p> <p>Welcome to LinkedIn, the world's largest professional network with more than <b>562 million users</b> in more than 200 countries and territories worldwide.</p> <p><b>Attachment 2 (About LinkedIn (Webpage, 2018)) at 1.</b></p>

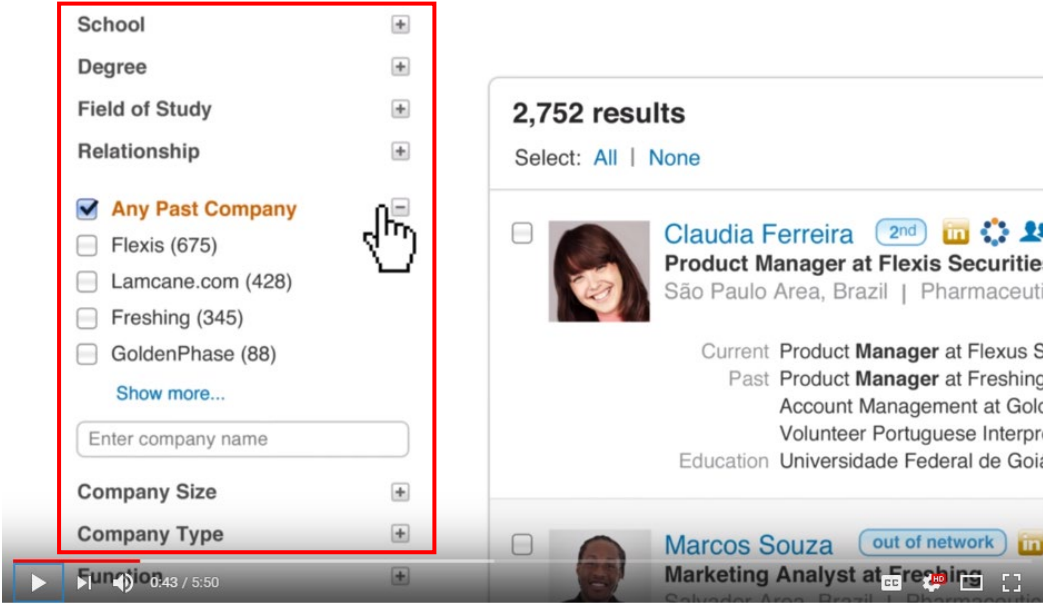


Exemplary Claim 6	Accused Product (or Service)
	 <p>The screenshot shows a LinkedIn search results page with the following details:</p> <ul style="list-style-type: none"><li>Search bar: "in Search"</li><li>Navigation: Home, My Network, Jobs, Messaging</li><li>Results: Showing 6,673 results</li><li>Profile 1: Jerry W. - 2nd, Patent Strategy &amp; Analytics Counsel at Intel Corporation, United States, 4 shared connections, Connect button.</li><li>Profile 2: Kyle Grimshaw - 2nd, Patent Counsel at Eli Lilly and Company, United States, 4 shared connections, Connect button.</li><li>Profile 3: James McKenzie - 2nd, Intellectual Property Attorney, Greater Los Angeles Area, Current: Attorney at Counsel On Call, 5 shared connections, Connect button.</li><li>Profile 4: Thomas Lavery - 2nd, Senior Patent Litigation Counsel at Amgen, United States, 5 shared connections, Connect button.</li><li>Profile 5: Blake Sorensen - 2nd, Patent Counsel, Washington D.C. Metro Area, Current: Patent Counsel at HP, 6 shared connections, Connect button.</li></ul>
	<p>LinkedIn stores and maintains data of plurality of candidates or participants along with their information.</p> <p>[Snapshot taken after creating a profile in LinkedIn.com website]</p>

Exemplary Claim 6	Accused Product (or Service)
<p>present a user with an interface from which the user makes a selection of a category from a plurality of categories;</p>	<p>Plaintiff contends that by using LinkedIn Talent Solutions products that is, LinkedIn Recruiter or LinkedIn Recruiter Lite, user or recruiter is presented with an interface for making a selection of a category from a plurality of categories.</p> <div data-bbox="479 468 1333 537" style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 10px auto; width: 50%; text-align: center;"> <p>Selection of a category from a plurality of categories</p> </div> <div data-bbox="397 604 1443 1102"> <p style="text-align: center;">Recruiter benefits</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Find the right candidate, faster</p> <p>It's easy to hone in on the perfect hire with LinkedIn's most powerful search tools at your fingertips — including guided search, Spotlights, and advanced recruiting filters.</p> </div> <div style="width: 50%;">  </div> </div> </div>
	<p><b>Attachment 3 (LinkedIn Recruiter (Webpage, 2018)) at 1.</b></p> <div data-bbox="440 1173 1401 1717">  </div> <p>***</p>



Exemplary Claim 6	Accused Product (or Service)
	 <p>Custom Filters ▾</p> <ul style="list-style-type: none"> <li>Status <input type="checkbox"/></li> <li>Source <input type="checkbox"/></li> <li>Company Followers <input type="checkbox"/></li> <li>Current Company <input type="checkbox"/></li> <li><input checked="" type="checkbox"/> <b>Any Location</b> <input type="checkbox"/></li> <li><input type="checkbox"/> United States (5,362,123)</li> <li><input type="checkbox"/> United Kingdom (1,226,594)</li> <li><input type="checkbox"/> India (418,962)</li> <li><input type="checkbox"/> Brazil (24,685)</li> </ul> <p>Show more...</p> <p>Enter location name</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Any industry</b> <input type="checkbox"/></li> <li><input type="checkbox"/> Marketing &amp; Advertising (10,524)</li> <li><input type="checkbox"/> Financial Services (5,854)</li> <li><input checked="" type="checkbox"/> <b>Pharmaceuticals (2,752)</b></li> <li><input type="checkbox"/> Telecommunications (1,637)</li> </ul> <p>Show more...</p> <p>Enter location name</p> <p>7,352,856 results</p> <p>Select: All   None</p> <p><input type="checkbox"/>  <b>Matthew Williams</b> <span>out of network</span>  <b>Marketing Manager at FixDex</b>          San Francisco Bay Area   Advertising          Current <b>Marketing Manager</b> at FixDe;          Past <b>Sr. Product Manager</b> at Zoom  <b>Product Manager</b> at Lamcane          Assistant to Marketing Directo          Volunteer Russian Interpreter          Education University of Pennsylvania, MI</p> <p><input type="checkbox"/>  <b>Irene Kuo</b> <span>2nd</span>     500+  <b>Product Manager at Flexis Securitie</b>          San Francisco Bay Area</p> <p>User or recruiter can select one or more categories by using the interface.</p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>  <ul style="list-style-type: none"> <li><input type="checkbox"/> United States (5,362,123)</li> <li><input type="checkbox"/> United Kingdom (1,226,594)</li> <li><input type="checkbox"/> India (418,962)</li> <li><input checked="" type="checkbox"/> <b>Brazil (24,685)</b></li> </ul> <p>Show more...</p> <p>Enter location name</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Any Industry</b> <input type="checkbox"/></li> <li><input type="checkbox"/> Marketing &amp; Advertising (10,524)</li> <li><input type="checkbox"/> Financial Services (5,854)</li> <li><input checked="" type="checkbox"/> <b>Pharmaceuticals (2,752)</b></li> <li><input type="checkbox"/> Telecommunications (1,637)</li> </ul> <p>Show more...</p> <p>Enter location name</p> <p>10,039 results</p> <p>Select: All   None</p> <p><input type="checkbox"/>  <b>Claudia Ferreira</b> <span>2nd</span>      <b>Product Manager at Flexis Securitie</b>          São Paulo Area, Brazil   Pharmaceuti</p> <p>Current <b>Product Manager</b> at Flexus S          Past <b>Product Manager</b> at Freshing          Account Management at Golc          Volunteer Portuguese Interpre          Education Universidade Federal de Goiá</p> <p><input type="checkbox"/>  <b>Marcos Souza</b> <span>out of network</span>   <b>Marketing Analyst at Freshing</b></p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>

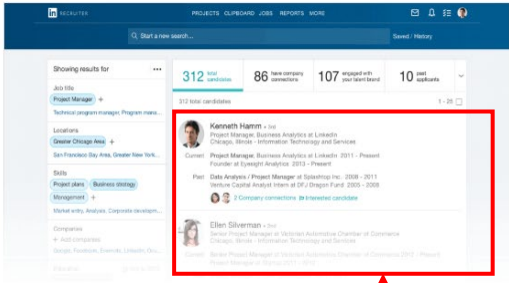
Exemplary Claim 6	Accused Product (or Service)
	 <p><b>2,752 results</b> Select: All   None</p> <p><b>Claudia Ferreira</b> (2nd) Product Manager at Flexis Security São Paulo Area, Brazil   Pharmaceut</p> <p><b>Marcos Souza</b> (out of network) Marketing Analyst at Freshing</p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>

in response to receiving the selection of the category by the user, present, for the user, some of the information associated with each of multiple participants from the plurality of participants which match the selection of the category by the user, while

Plaintiff contends that based on the selection of the category, some of the information associated with each of multiple participants from the plurality of participants is displayed to the user or recruiter which matches the selection of the category by the user. Also, contact information of each of the multiple participants is shielded from the user.

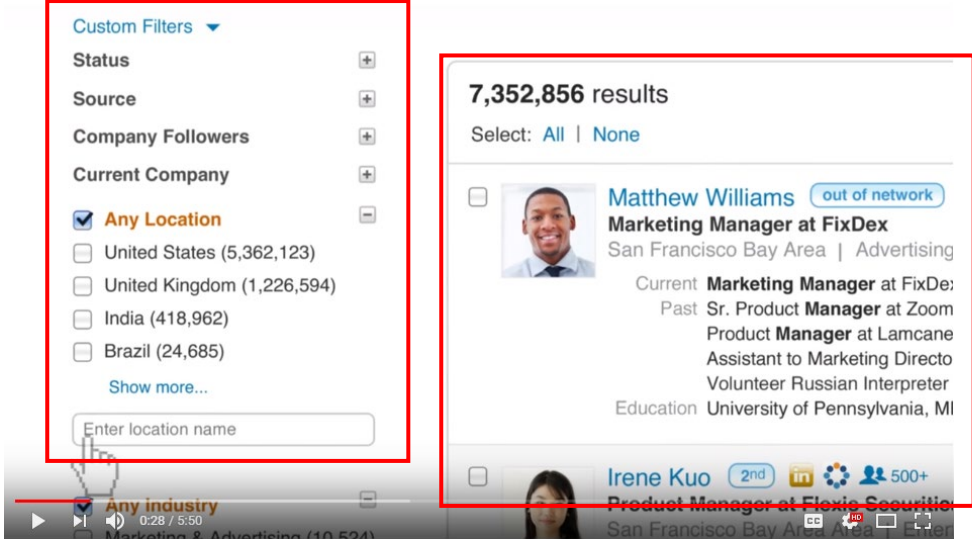
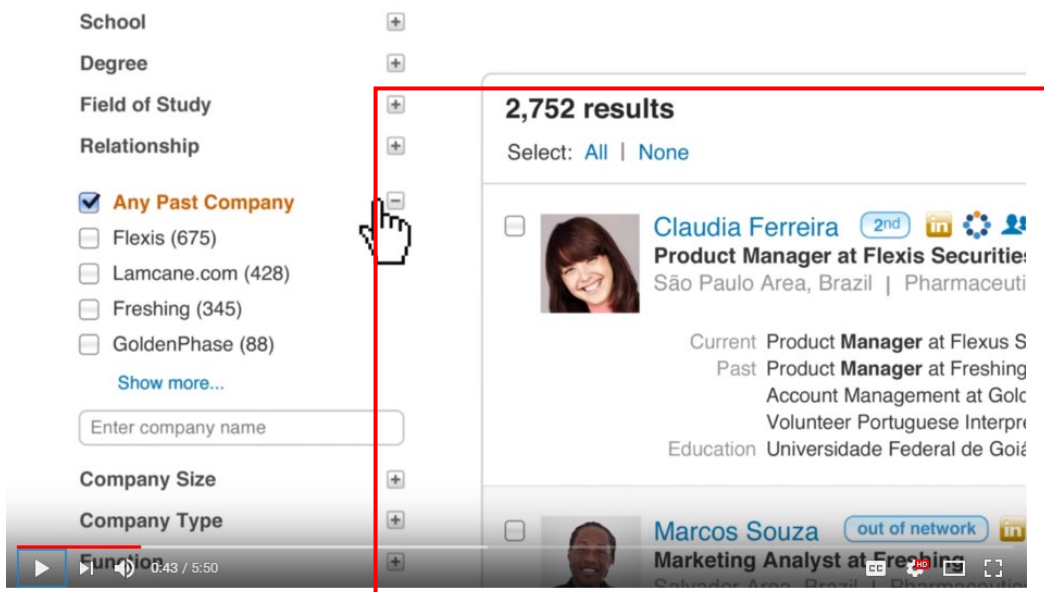
Find the right candidate, faster

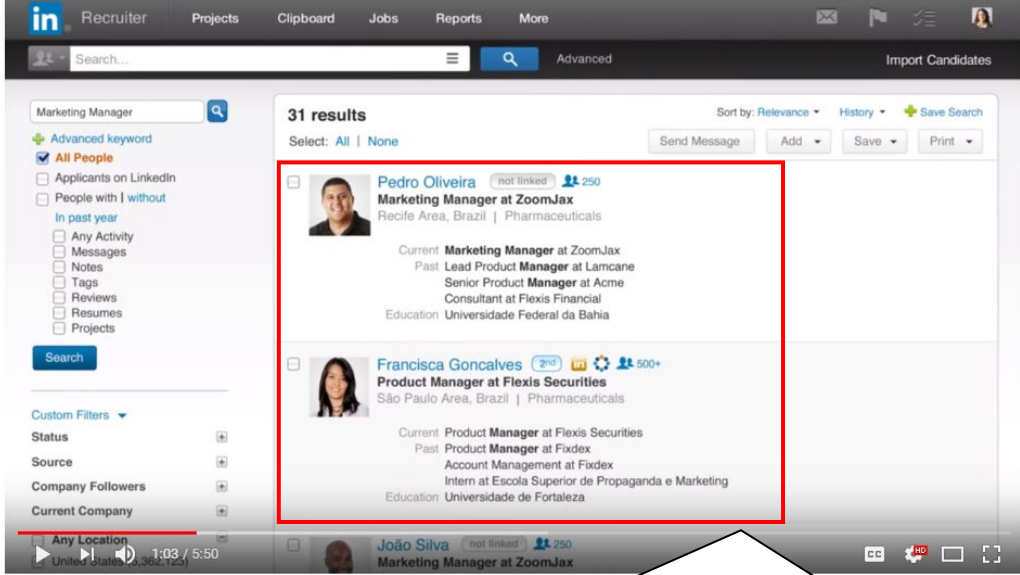
It's easy to hone in on the perfect hire with LinkedIn's most powerful search tools at your fingertips — including guided search, Spotlights, and advanced recruiting filters.

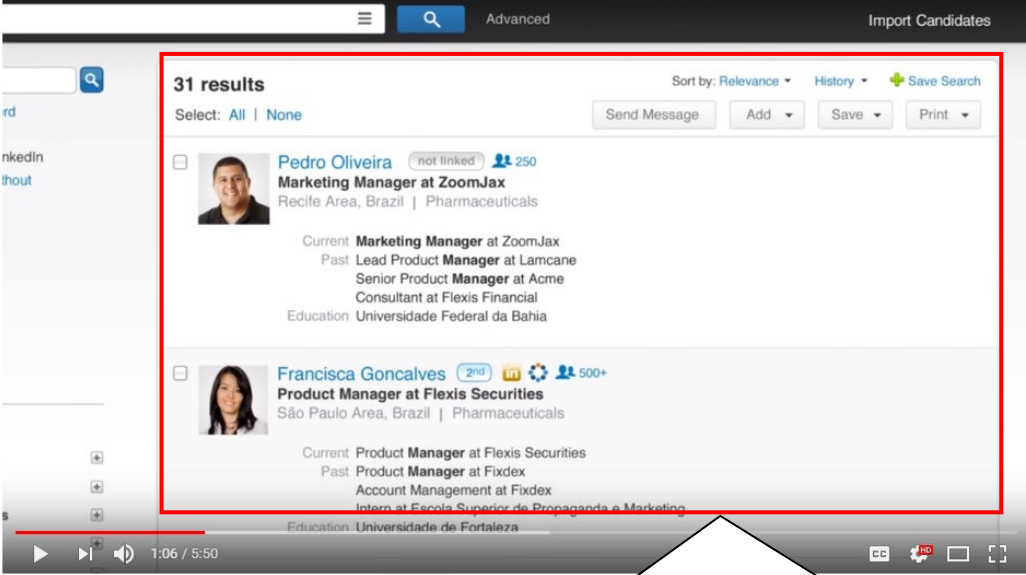
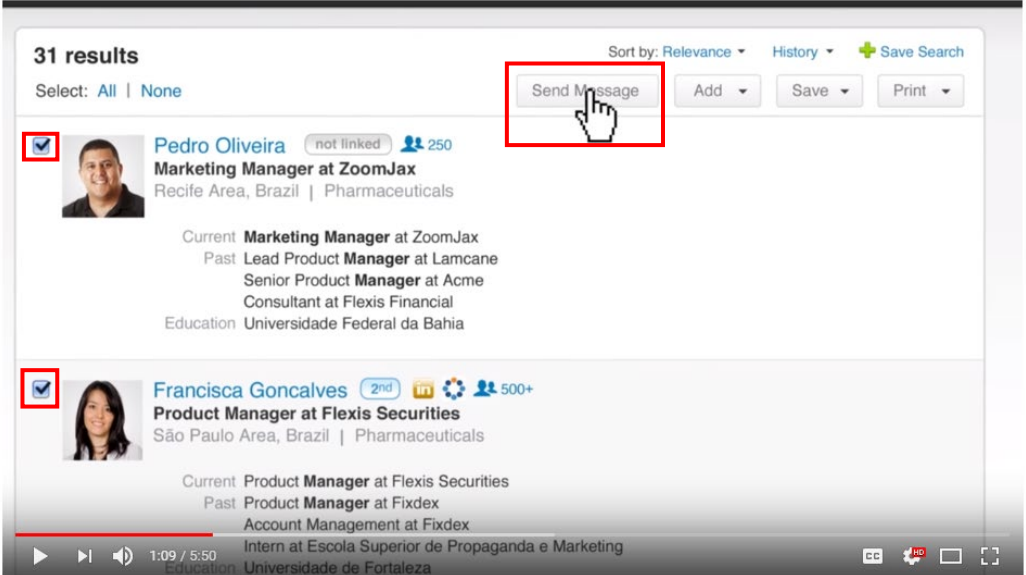


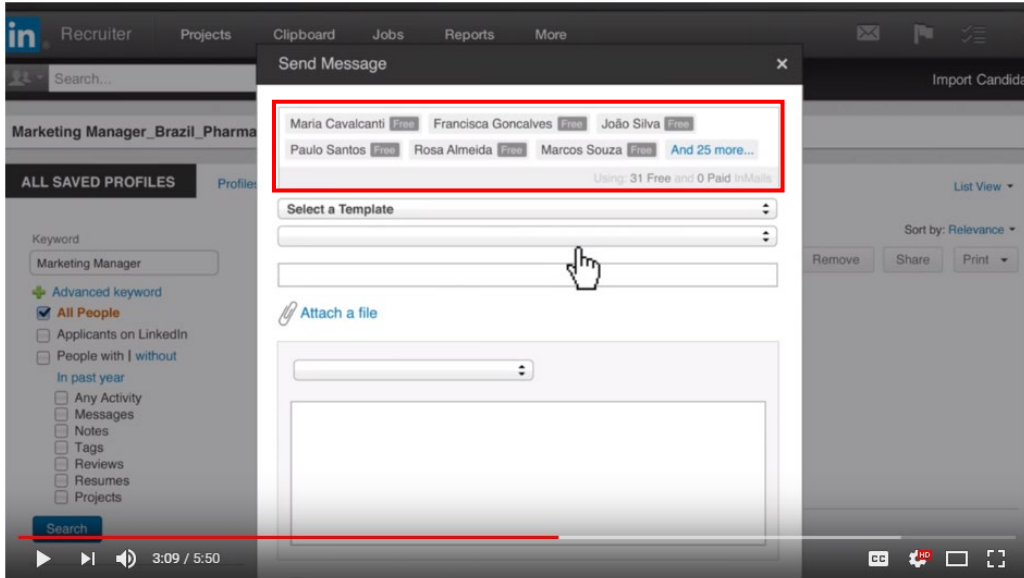
**Attachment 3 (LinkedIn Recruiter (Webpage, 2018)) at 1.**

Some of the information associated with each participant from the plurality of participants is displayed to the user or recruiter matching the selection of the category.

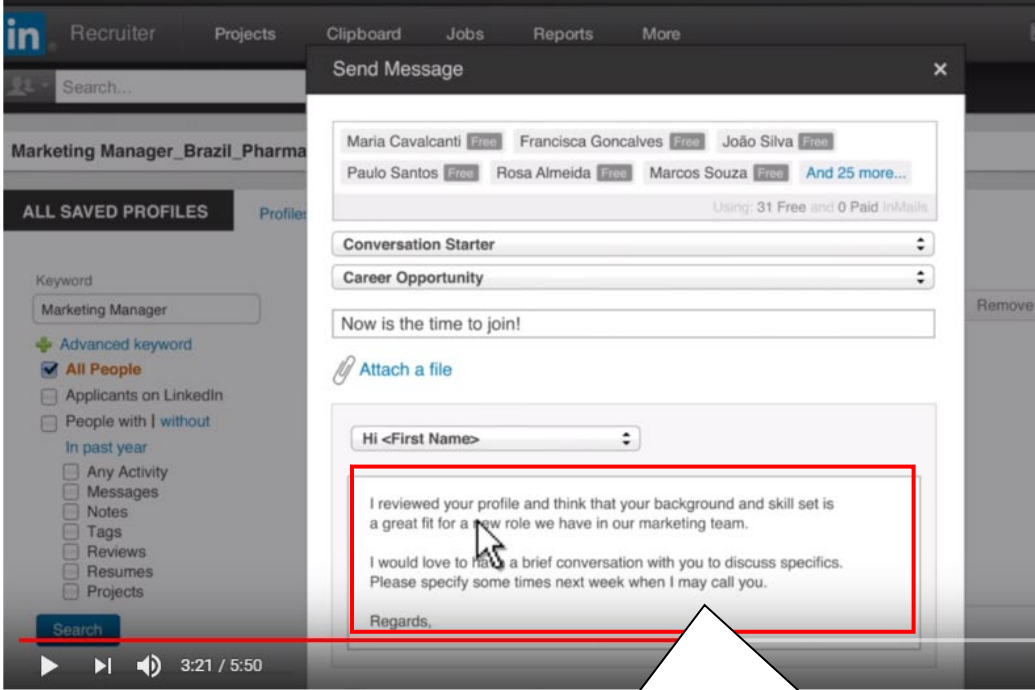
Exemplary Claim 6	Accused Product (or Service)
<p>shielding contact information associated with each of the multiple participants ;</p>	 <p><b>7,352,856 results</b> Select: All   None</p> <p><b>Matthew Williams</b> <span>out of network</span> Marketing Manager at FixDex San Francisco Bay Area   Advertising</p> <p>Current <b>Marketing Manager</b> at FixDe; Past <b>Sr. Product Manager</b> at Zoom <b>Product Manager</b> at Lamcane Assistant to Marketing Directo Volunteer Russian Interpreter Education University of Pennsylvania, MI</p> <p><b>Irene Kuo</b> <span>2nd</span> <span>500+</span> Product Manager at Flexis Security San Francisco Bay Area</p> <p><b>Any Location</b> <input checked="" type="checkbox"/> <span>5</span>  <input type="checkbox"/> United States (5,362,123)  <input type="checkbox"/> United Kingdom (1,226,594)  <input type="checkbox"/> India (418,962)  <input type="checkbox"/> Brazil (24,685)  <a href="#">Show more...</a>  <input type="text" value="Enter location name"/></p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>  <p><b>2,752 results</b> Select: All   None</p> <p><b>Claudia Ferreira</b> <span>2nd</span> <span>500+</span> Product Manager at Flexis Security São Paulo Area, Brazil   Pharmaceuti</p> <p>Current <b>Product Manager</b> at Flexus S Past <b>Product Manager</b> at Freshing Account Management at Golc Volunteer Portuguese Interpre Education Universidade Federal de Goiá</p> <p><b>Marcos Souza</b> <span>out of network</span> Marketing Analyst at Freshing</p> <p><b>Any Past Company</b> <input checked="" type="checkbox"/> <span>5</span>  <input type="checkbox"/> Flexis (675)  <input type="checkbox"/> Lamcane.com (428)  <input type="checkbox"/> Freshing (345)  <input type="checkbox"/> GoldenPhase (88)  <a href="#">Show more...</a>  <input type="text" value="Enter company name"/></p> <p><b>School</b> <input type="checkbox"/> <span>+</span>  <b>Degree</b> <input type="checkbox"/> <span>+</span>  <b>Field of Study</b> <input type="checkbox"/> <span>+</span>  <b>Relationship</b> <input type="checkbox"/> <span>+</span>  <b>Company Size</b> <input type="checkbox"/> <span>+</span>  <b>Company Type</b> <input type="checkbox"/> <span>+</span></p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>

Exemplary Claim 6	Accused Product (or Service)
	 <p>The contact information of each participant remains hidden or shielded from the</p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>
<p>wherein displaying some of the information associated with each of the multiple participants is based at least in part on a rating of individual participants in the plurality of participants ;</p>	<p>Plaintiff contends that the information associated with each of the multiple participants is displayed based on a rating or ranking of individual participant in the plurality of participants. Multiple factors are considered for displaying the search results in certain order or ranking.</p> <p>LinkedIn uses proprietary algorithms to order the results you get when you search for people on the site.</p> <ul style="list-style-type: none"> <li>• There's no single order for LinkedIn search - Unlike standard search engines, we generate relevance uniquely for each member. The order of a search result is determined in part by the profile, activity, and connections of the person who is searching. Testing a query from a handful of users is not likely to reflect the overall order any profile has across the millions of queries that LinkedIn has every day. A closer measure would be the number of views your profile gets, which you can learn about in the <a href="#">Who's Viewed Your Profile section</a> on your homepage.</li> <li>• Searcher relevance is based on a variety of factors - Relevance is a proprietary algorithm that we're constantly improving. Our goal is to optimize your search results. Before we return results, we consider the searcher's activity on LinkedIn, the profiles returned by the query, and other members who have run similar searches in determining the sort order. We also consider your search history to predict results that are likely to be more relevant to you. These, along with other factors, combine to provide us with data to improve the overall quality of our members' search results.</li> </ul> <p><b>Attachment 4 (LinkedIn Search Relevance - People Search   LinkedIn Help (Webpage, 2018)) at 1.</b></p>

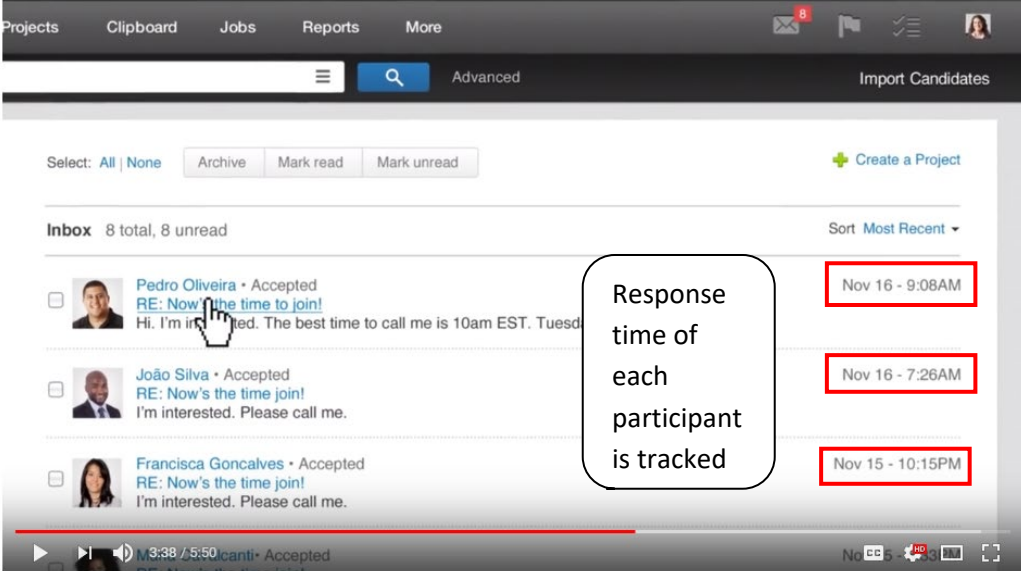
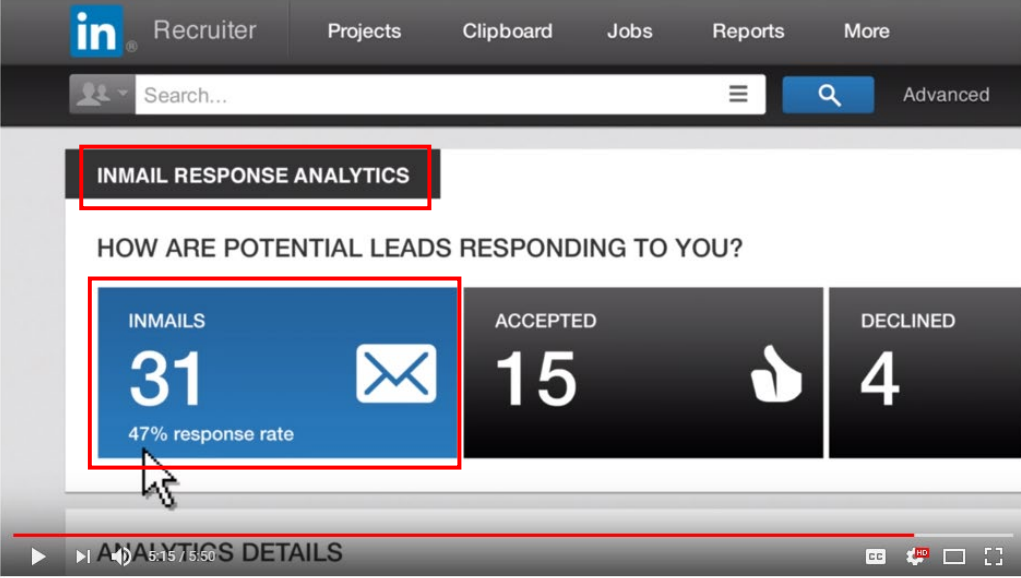
Exemplary Claim 6	Accused Product (or Service)
	 <p>Depending upon multiple factors, each candidate or participant is displayed based on a rating or ranking system.</p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>
<p>enabling the user to send an inquiry message to one or more of the multiple participants, while shielding the contact information from the user, the contact information including any messaging identifier that is associated</p>	<p>Plaintiff contends that user or recruiter can send inquiry message(s) to one or more participants or candidates, while the contact information associated with each participant (such as emails, messaging identifiers, etc.) remains hidden or shielded from the user.</p> 

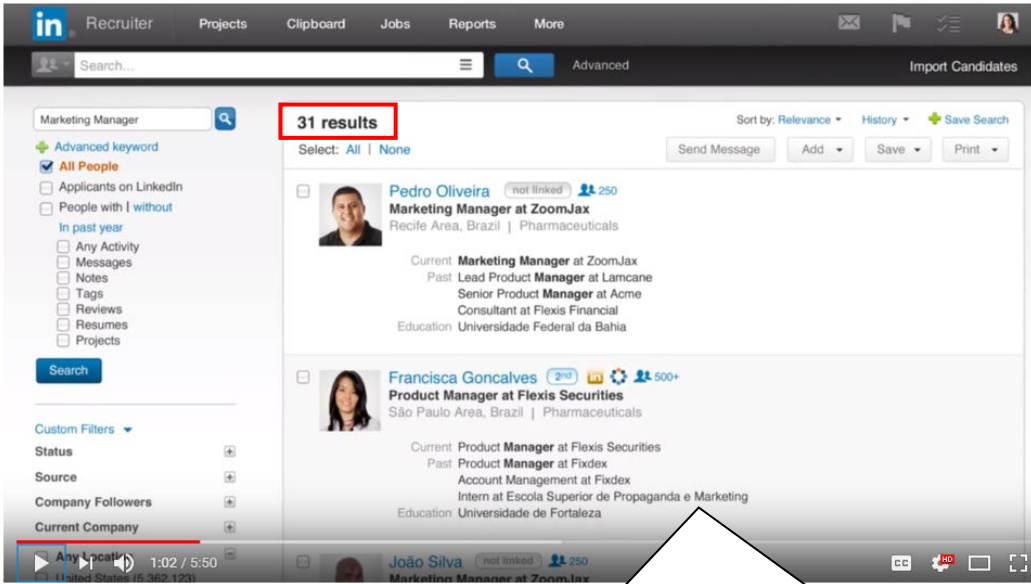
Exemplary Claim 6	Accused Product (or Service)
<p>with each of the one or more participants ;</p>	<p>User can send inquiry message(s) to one or more participants, while the contact information associated with each participant (such as emails, messaging identifiers, etc.) remains hidden or shielded from the user.</p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>  <p>The screenshot shows the LinkedIn Recruiter interface. A 'Send Message' modal window is open, displaying a list of recipients. The recipients are: Maria Cavalcanti (Free), Francisca Gonçalves (Free), João Silva (Free), Paulo Santos (Free), Rosa Almeida (Free), Marcos Souza (Free), and And 25 more... Below the list, there is a 'Select a Template' dropdown menu, a text input field, and an 'Attach a file' button. The video player controls at the bottom show a duration of 3:09 / 5:50.</p> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>



Exemplary Claim 6	Accused Product (or Service)
	 <p data-bbox="509 999 1393 1115">Inquiry message is sent to one or more participants, while the contact information remains hidden from the user.</p> <p data-bbox="407 1142 1224 1178"><b>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</b></p>
<p>tracking a response time of each of the one or more participants who received the message from the user; and</p>	<p>Plaintiff contends that response-time of each participant who received the message from the user is tracked.</p>



Exemplary Claim 6	Accused Product (or Service)
	 <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>  <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>
<p>updating the rating associated with each of the one or more participants</p>	<p>Plaintiff contends that rating of each participant is updated based on his or her response-time or reply-time. For example, in case of LinkedIn Recruiter (or Recruiter Lite), once the user or recruiter sends the inquiry message, each participant’s response time is tracked and each participant’s rating gets updated based on his or her response-time, for examples as “Accepted”, “Declined”, etc.</p>

Exemplary Claim 6	Accused Product (or Service)
<p>based at least in part on the tracked response time.</p>	 <p>The screenshot shows the LinkedIn Recruiter interface. At the top, there are navigation tabs: Recruiter, Projects, Clipboard, Jobs, Reports, and More. A search bar contains the text 'Marketing Manager'. To the right of the search bar, it says '31 results'. Below the search bar, there are filters for 'Advanced keyword', 'All People', and 'People with   without'. There are also filters for 'In past year' and 'Any Activity'. The search results list shows two profiles: Pedro Oliveira, Marketing Manager at ZoomJax, and Francisca Goncalves, Product Manager at Flexis Securities. A callout box points to the search results list.</p> <p>For example, in this case, user sends inquiry message (along with his offer) to 31 participants. Some of them respond back by accepting the offer, some of them respond back by declining the offer, some of them do not respond back, and so on. In each case, response-time is tracked for updating “Inmail Response Analytics” dashboard and hence, the rating of the each participant gets updated within the list of search results along with status as “Accepted”, “Declined”, “No Response” and so on.</p> <p><b>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</b></p>

<p><b>Exemplary Claim 6</b></p>	<div data-bbox="407 191 1443 850"> <p style="text-align: center;"><b>Accused Product (or Service)</b></p> <p>Select: All   None    Archive    Mark read    Mark unread    <span style="float: right;">+ Create a Project</span></p> <p><b>Inbox</b> 8 total, 8 unread    Sort: Most Recent</p> <ul style="list-style-type: none"> <li><b>Pedro Oliveira</b> • Accepted RE: Now's the time to join! Hi, I'm interested. The best time to call me is 10am EST. Tuesday would be great. <span style="float: right;">Nov 16 - 9:08AM</span></li> <li><b>João Silva</b> • Accepted RE: Now's the time join! I'm interested. Please call me. <span style="float: right;">Nov 16 - 7:26AM</span></li> <li><b>Francisca Goncalves</b> • Accepted RE: Now's the time join! I'm interested. Please call me. <span style="float: right;">Nov 15 - 10:15PM</span></li> </ul> </div> <div data-bbox="894 877 1419 978"> <p>Response time of each participant is tracked</p> </div> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p> <div data-bbox="407 1037 1443 1619"> <p><b>INMAIL RESPONSE ANALYTICS</b></p> <p>HOW ARE POTENTIAL LEADS RESPONDING TO YOU?</p> <table border="1"> <tr> <td> <p>INMAILS</p> <p><b>31</b></p> <p>47% response rate</p> </td> <td> <p>ACCEPTED</p> <p><b>15</b></p> </td> <td> <p>DECLINED</p> <p><b>4</b></p> </td> </tr> </table> </div> <div data-bbox="407 1625 829 1822"> <p>Response-time of each participant is monitored which further updates the response-rate</p> </div> <div data-bbox="841 1625 1443 1822"> <p>Each participant's rating gets updated within the search results based on his or her response-time along with change in status as accepted, declined, no response, etc.</p> </div> <p>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</p>	<p>INMAILS</p> <p><b>31</b></p> <p>47% response rate</p>	<p>ACCEPTED</p> <p><b>15</b></p>	<p>DECLINED</p> <p><b>4</b></p>
<p>INMAILS</p> <p><b>31</b></p> <p>47% response rate</p>	<p>ACCEPTED</p> <p><b>15</b></p>	<p>DECLINED</p> <p><b>4</b></p>		

Exemplary Claim 6	Accused Product (or Service)
	<div data-bbox="402 317 1432 800" data-label="Image"> <p>The image shows a LinkedIn search filter interface. A yellow highlight is placed over the text "People with activity". Below it, a filter menu is open, showing options for "Activity type": "All people", "People without", and "People with" (which is selected). Other filter options include "Any activity", "Messages", "Notes", "Tags", "Projects", "Reviews", and "Resumes". A "Within: Anytime" dropdown is also visible. To the right, a profile snippet for Driena Panaro is shown, with various activity metrics and tags highlighted by red boxes.</p> </div> <p data-bbox="402 821 1398 888"><b>Attachment 5 (It's a Match: LinkedIn Recruiter Relevant Search (2014)) at 8 of 25.</b></p> <div data-bbox="402 909 1425 1203" data-label="Text"> <p>Besides, each participant's past activity on the LinkedIn (for example, response-time, etc.) is also tracked, for which "Activity Type" filter is provided to sort the list of search results based on each participant's activity. That is, each participant's ranking or rating depends upon his or her past activity (such as message response-time, etc.) and accordingly, rating of each participant is updated within the list of search results.</p> </div> <div data-bbox="402 1220 818 1549" data-label="Text"> <p>In this case, for example, if a participant was active or responding within past 7 days and matching user's selection criteria, then he will be shown in the search results.</p> </div> <div data-bbox="818 1220 1425 1562" data-label="Image"> <p>The image shows a LinkedIn search results page. The search bar at the top contains "Marketing Manager_Brazil_Pharma". Below the search bar, the results are filtered to "People with activity last 7 days". A red box highlights this filter. The results show "31 people changed status" and "Not yet contacted". A progress bar indicates "31 new of 31 total". Below the results, there is a section for "PROFILES IN THIS PROJECTS".</p> </div> <p data-bbox="402 1583 1224 1619"><b>[Source: <a href="https://www.youtube.com/watch?v=pGgy_T-6nA0">https://www.youtube.com/watch?v=pGgy_T-6nA0</a>]</b></p>

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

11. LinkedIn has and continues to contributorily infringe. LinkedIn has actively encouraged or instructed others (e.g., its customers/end users and/or the customers of its related companies), and continues to do so, on how to use its LinkedIn Talent Solutions products and services (e.g., social networking site focused on business and professional networking on the Internet) and related services that provide social networking focused on business and professional networking across the Internet such as to cause infringement of claims 1–11 of the '107 patent, literally or under the doctrine of equivalents. Moreover, LinkedIn has known of the '107 patent and the technology underlying it from at least the date of issuance of the patent.

12. LinkedIn has caused and will continue to cause NETSOC damage by direct and indirect infringement of (including inducing infringement of) the claims of the '107 patent.

#### **IV. INFRINGEMENT ('344 Patent)**


13. On July 21, 2009, U.S. Patent No. 7,565,344 (“the ‘344 patent”, attached as Exhibit B) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ‘344 patent by assignment.

14. The ‘344 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.


15. LinkedIn maintains, operates, and administers a website at [www.Linkedin.com](http://www.Linkedin.com) that infringes one or more claims of the ‘344 patent, including at least claims 1-14, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘344 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.

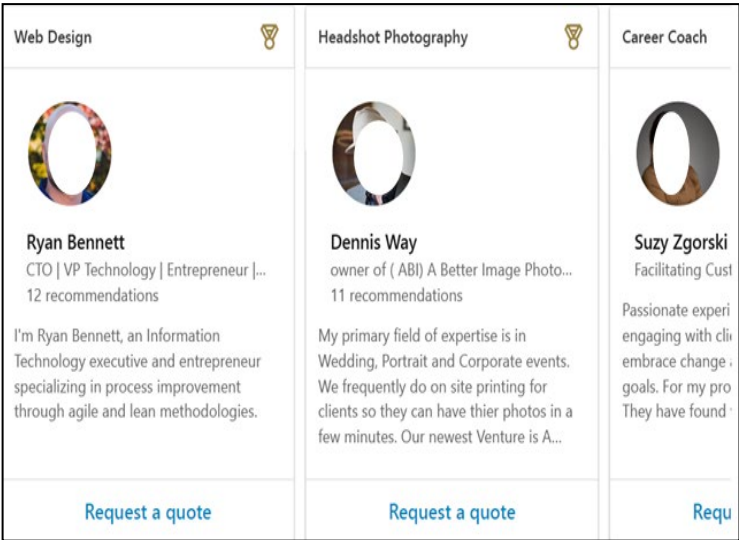
16. Support for the allegations of infringement may be found in the following preliminary table:

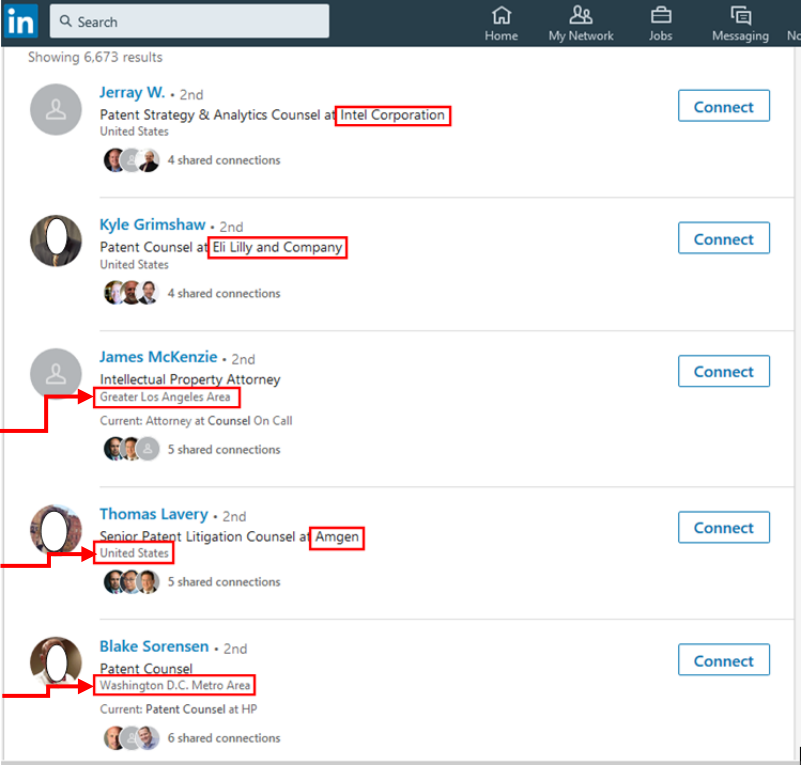
Exemplary Claim 10	Accused Product (or Service)
<p>10. A system for establishing a social connection, the system comprising:</p>	<p>Plaintiff contends that LinkedIn offers a system for establishing a social connection.</p>  <p>***</p> <p><b>Attachment 6 (About LinkedIn (Webpage, 2018)) at 1.</b></p>
<p>a combination of one or more processors and memory that operate to:</p>	<p>Plaintiff contends that LinkedIn has deployed servers (having processors and memory).</p>






























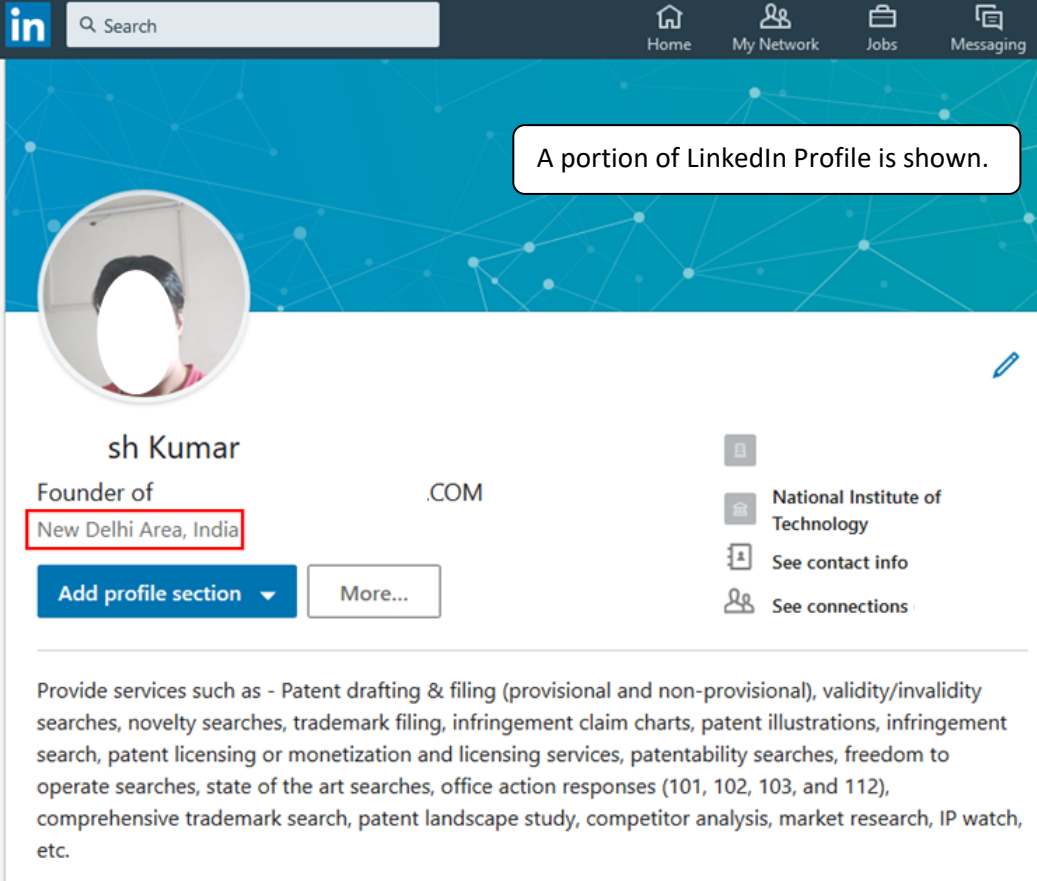
Exemplary Claim 10	Accused Product (or Service)
	<p><b>Servers</b> in design</p> <ul style="list-style-type: none"> <li>• Dell, HPe, SuperMicro, Flex, Celestica and Inspur are actively working on Open19 server</li> <li>• White boxes in development by <b>Linkedin</b>:               <ul style="list-style-type: none"> <li>• Quad socket Broadwell-DE in a half width 1RU (brick)</li> <li>• Dual socket High-end Skylake with up to <b>1.5T memory</b> in 1RU</li> <li>• <b>Storage Servers</b> – Single socket up to 32 drives per 1RU</li> </ul> </li> <li>• One clarification about the high density solution – To get to the full capacity (96 @ 19.2Kw) the core count will only be 3000</li> </ul> <p><b>Attachment 7 (Linkedin Open19 Deep Dive (2017)) at 14 of 28.</b></p>  <p><i>Id.</i> at 8 of 28.</p>

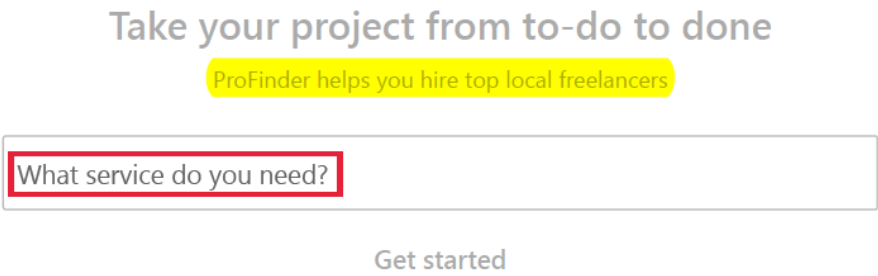


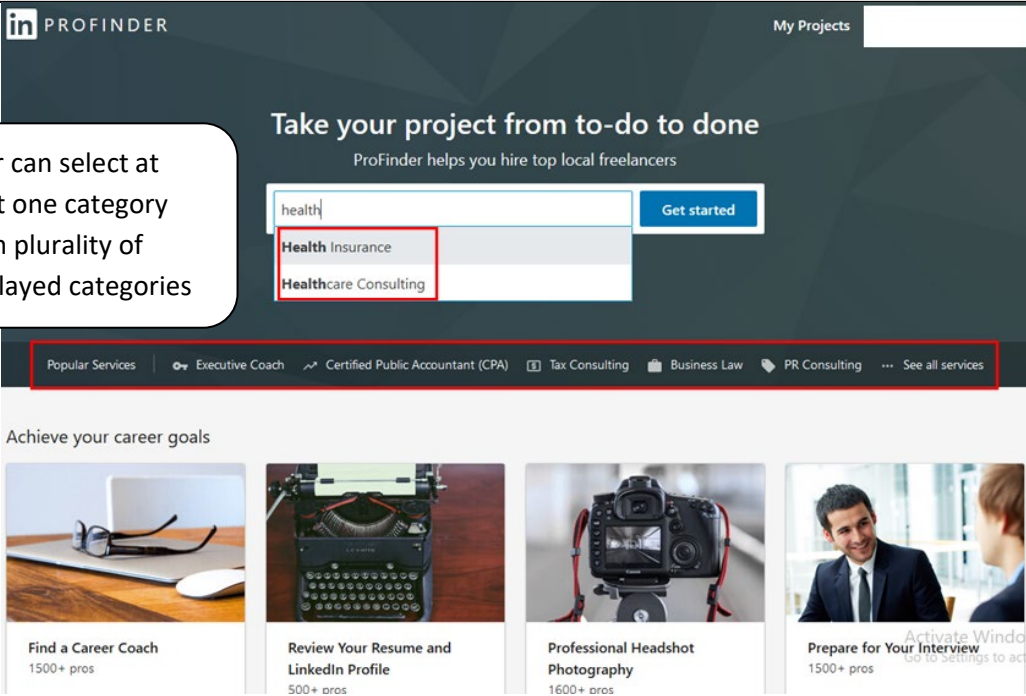
Exemplary Claim 10	Accused Product (or Service)
	<div data-bbox="440 268 1398 344" style="background-color: #0056b3; color: white; padding: 5px; text-align: center;"> <h2 style="margin: 0;">Linkedin Deployment Model</h2> </div> <p style="text-align: center;">---</p> <p><b>Server</b> Integration</p> <ul style="list-style-type: none"> <li><b>Insertion of servers on demand</b></li> <li>Fully automated provisioning and deployment</li> <li><b>Deploy 1000s of servers</b> in days not months</li> <li>Create an elastic data center model with fix low cost infra</li> </ul> <p><i>Id.</i> at 21 and 23 of 28.</p>
<p>maintain a list comprising a plurality of participants, wherein each participant in the plurality of participants corresponds to an organization or an individual, wherein the list includes information associated with at least some of the participants, and wherein the information associated with each participant includes biographical information,</p>	<p>Plaintiff contends that LinkedIn (by using one or more servers) stores and maintains data of plurality of participants or candidates along with their information. Each candidate profile contains information such as biographical information; the biographical information also includes a location or geographic region of each participant or candidate.</p> <div style="display: flex; align-items: flex-start;"> <div data-bbox="407 1003 683 1539" style="border: 1px solid black; border-radius: 15px; padding: 10px; margin-right: 10px;"> <p>LinkedIn stores and maintains a list of participants or candidates along with their associated information such as biographical information which also includes their geographic region or location data.</p> </div> <div data-bbox="691 1003 1425 1539">  </div> </div> <p><b>Attachment 5 (Find Trustworthy Freelancers - LinkedIn ProFinder (Webpage, 2018)) at 2.</b></p>

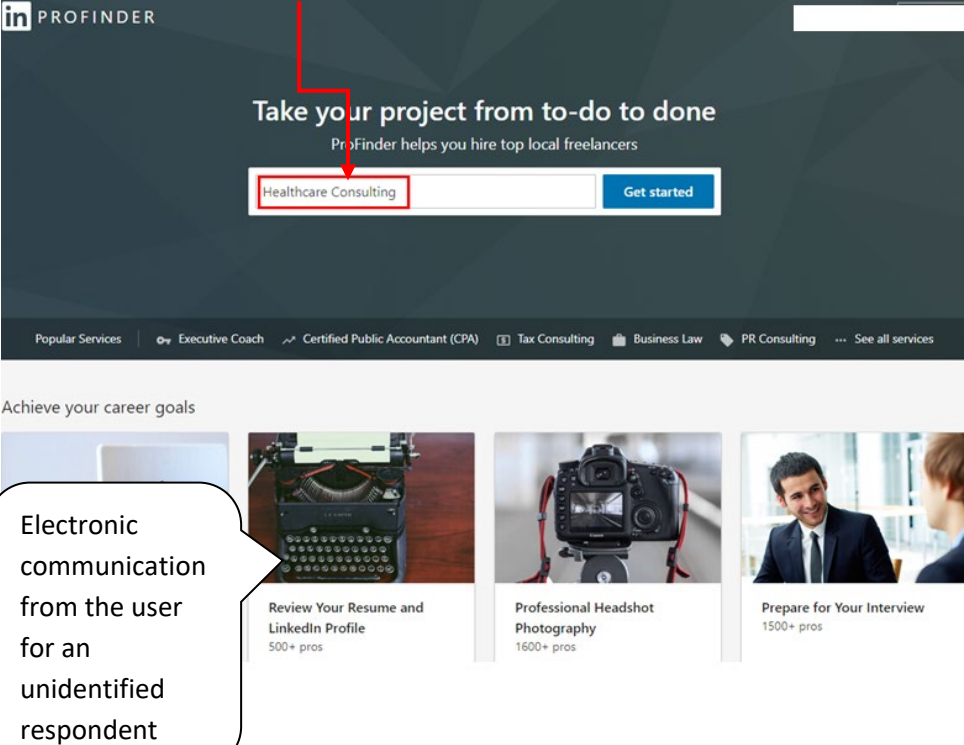
Exemplary Claim 10	Accused Product (or Service)	
<p>the biographical information identifying a geographic region that is associated with, or deemed a residing location, of each of at least some of the participant</p>	<p><b>Besides,</b> LinkedIn also stores and maintains organization data.</p> <p>The biographical information also identifies geographic region or location data associated with each participant or candidate.</p>	 <p>The screenshot shows a LinkedIn search interface with the following results:</p> <ul style="list-style-type: none"> <li><b>Jerry W.</b> - 2nd Patent Strategy &amp; Analytics Counsel at <b>Intel Corporation</b>, United States. 4 shared connections.</li> <li><b>Kyle Grimshaw</b> - 2nd Patent Counsel at <b>Eli Lilly and Company</b>, United States. 4 shared connections.</li> <li><b>James McKenzie</b> - 2nd Intellectual Property Attorney, Greater Los Angeles Area. Current: Attorney at Counsel On Call. 5 shared connections.</li> <li><b>Thomas Lavery</b> - 2nd Senior Patent Litigation Counsel at <b>Amgen</b>, United States. 5 shared connections.</li> <li><b>Blake Sorensen</b> - 2nd Patent Counsel, Washington D.C. Metro Area. Current: Patent Counsel at HP. 6 shared connections.</li> </ul> <p>Red boxes highlight the company names (Intel Corporation, Eli Lilly and Company, Amgen) and geographic locations (Greater Los Angeles Area, Washington D.C. Metro Area). Red arrows point from the text in the adjacent column to these highlighted elements.</p> <p>[Snapshot taken after creating a profile in LinkedIn.com website]</p>

Exemplary Claim 10	Accused Product (or Service)									
	<p data-bbox="477 279 781 310">People you may know</p> <table border="1" data-bbox="444 327 1395 1373"> <tr> <td data-bbox="444 327 760 722">   <b>Ritu (Questel India)</b>                      Director at De Science Infoware Pvt Ltd (Represent Questel)                      Nadeen M. Nusair and 23 others  <a href="#">Connect</a> </td> <td data-bbox="760 327 1075 722">   <b>Alka Dwivedy</b>                      Legal Counsel at Consilio LLC  <a href="#">Connect</a> </td> <td data-bbox="1075 327 1395 722">   <b>Svetlana Tsareva</b>                      LL.M, MBA. International IP attorney.                      Jason Sander and 89 others  <a href="#">Connect</a> </td> </tr> <tr> <td data-bbox="444 722 760 1117">   <b>姜华丽</b>                      山东威海卫律师事务所 - 主任                      Akihiko Okuno and 91 others  <a href="#">Connect</a> </td> <td data-bbox="760 722 1075 1117">   <b>Abhishek Bansiwal</b>                      Lawyer at R.P SISHODIA &amp; ASSOCIATES  <a href="#">Connect</a> </td> <td data-bbox="1075 722 1395 1117">   <b>Jonathan Madsen</b>                      Co-Founder - Chief Brand Officer at Gray Falcon                      Jason Sander and 99 others  <a href="#">Connect</a> </td> </tr> <tr> <td data-bbox="444 1117 760 1373">   <b>Amrit .</b>                      Deputy General Manager at  <a href="#">Connect</a> </td> <td data-bbox="760 1117 1075 1373">   <b>Surabhi Tuli</b>                      Company Secretary  <a href="#">Connect</a> </td> <td data-bbox="1075 1117 1395 1373">   <b>Gautam Karni</b>                      Officer at Indian Oil  <a href="#">Connect</a> </td> </tr> </table> <p data-bbox="407 1394 1292 1430"><b>[Snapshot taken after creating a profile in LinkedIn.com website]</b></p> <div data-bbox="402 1465 1435 1625" style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p data-bbox="427 1482 1362 1593">LinkedIn profile of each participant or candidate is associated with information such as biographical information which also includes the geographic region or location related information.</p> </div>	 <b>Ritu (Questel India)</b> Director at De Science Infoware Pvt Ltd (Represent Questel) Nadeen M. Nusair and 23 others <a href="#">Connect</a>	 <b>Alka Dwivedy</b> Legal Counsel at Consilio LLC <a href="#">Connect</a>	 <b>Svetlana Tsareva</b> LL.M, MBA. International IP attorney. Jason Sander and 89 others <a href="#">Connect</a>	 <b>姜华丽</b> 山东威海卫律师事务所 - 主任 Akihiko Okuno and 91 others <a href="#">Connect</a>	 <b>Abhishek Bansiwal</b> Lawyer at R.P SISHODIA & ASSOCIATES <a href="#">Connect</a>	 <b>Jonathan Madsen</b> Co-Founder - Chief Brand Officer at Gray Falcon Jason Sander and 99 others <a href="#">Connect</a>	 <b>Amrit .</b> Deputy General Manager at <a href="#">Connect</a>	 <b>Surabhi Tuli</b> Company Secretary <a href="#">Connect</a>	 <b>Gautam Karni</b> Officer at Indian Oil <a href="#">Connect</a>
 <b>Ritu (Questel India)</b> Director at De Science Infoware Pvt Ltd (Represent Questel) Nadeen M. Nusair and 23 others <a href="#">Connect</a>	 <b>Alka Dwivedy</b> Legal Counsel at Consilio LLC <a href="#">Connect</a>	 <b>Svetlana Tsareva</b> LL.M, MBA. International IP attorney. Jason Sander and 89 others <a href="#">Connect</a>								
 <b>姜华丽</b> 山东威海卫律师事务所 - 主任 Akihiko Okuno and 91 others <a href="#">Connect</a>	 <b>Abhishek Bansiwal</b> Lawyer at R.P SISHODIA & ASSOCIATES <a href="#">Connect</a>	 <b>Jonathan Madsen</b> Co-Founder - Chief Brand Officer at Gray Falcon Jason Sander and 99 others <a href="#">Connect</a>								
 <b>Amrit .</b> Deputy General Manager at <a href="#">Connect</a>	 <b>Surabhi Tuli</b> Company Secretary <a href="#">Connect</a>	 <b>Gautam Karni</b> Officer at Indian Oil <a href="#">Connect</a>								

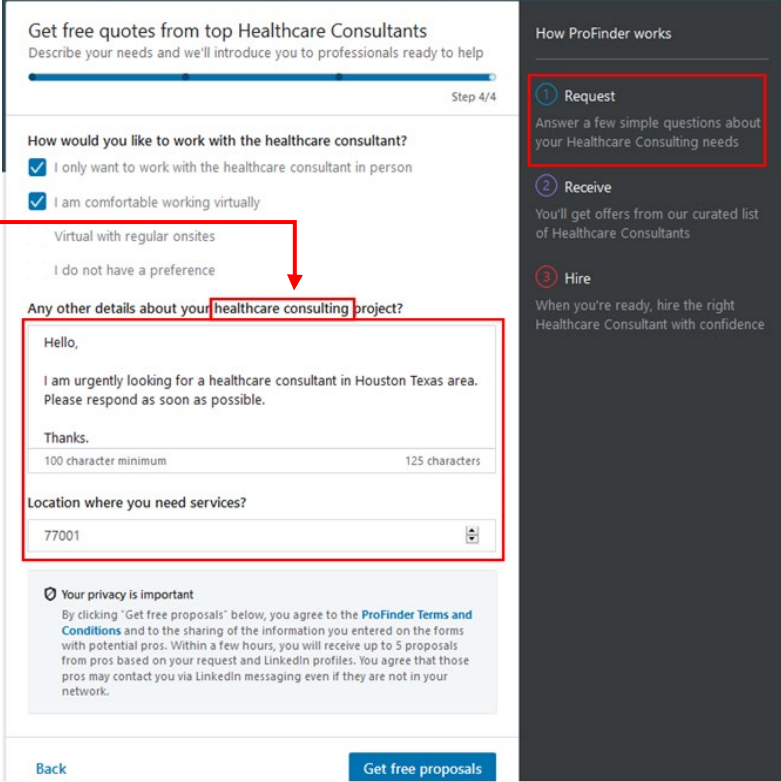
Exemplary Claim 10	Accused Product (or Service)
	 <p>A portion of LinkedIn Profile is shown.</p> <p>sh Kumar          Founder of .COM          New Delhi Area, India</p> <p>Provide services such as - Patent drafting &amp; filing (provisional and non-provisional), validity/invalidity searches, novelty searches, trademark filing, infringement claim charts, patent illustrations, infringement search, patent licensing or monetization and licensing services, patentability searches, freedom to operate searches, state of the art searches, office action responses (101, 102, 103, and 112), comprehensive trademark search, patent landscape study, competitor analysis, market research, IP watch, etc.</p> <p><b>[Snapshot taken after creating a profile in LinkedIn.com website]</b></p>
<p>enable a user to communicate with a selected participant that (i) is not known to the user, and (ii) is familiar with a geographic region of interest to the user, in order for the user to learn</p>	<p>Plaintiff contends that by using LinkedIn ProFinder, user can communicate with one or more unknown candidates of a specific location or geographic region so that the user can learn more information about any issues, requirements, interests, etc. which the user has that is specific or related to that location.</p> <p>By using LinkedIn ProFinder, user can submit his request along with selection of location and one or more categories. LinkedIn matches user's request with one or more participants or candidates profiles based on the selected location and one or more categories, and sends the user's request to a list of shortlisted candidates. After which, user receives responses from the shortlisted candidates (that is, unknown participant(s)). User can further communicate with one or more selected candidates.</p>

Exemplary Claim 10	Accused Product (or Service)
<p>more information about a problem or interest the user has that is specific to the geographic region, wherein enabling the user to communicate with the participant is performed by:</p>	<p><b>LinkedIn ProFinder - Overview</b></p> <p>LinkedIn ProFinder is LinkedIn's professional services marketplace that helps you find the best freelance or independent professionals in your area. It's currently only available within the U.S. and within specific service categories.</p> <p>We aim to get you up to five responses from highly qualified, local professionals within 24 business hours of your request submission. Currently, LinkedIn members from any valid U.S. zip code can file a request for a service.</p> <p><b>Attachment 4 (LinkedIn ProFinder - Overview   LinkedIn Help (Webpage, 2018)) at 1.</b></p>  <p><b>Attachment 5 (Find Trustworthy Freelancers - LinkedIn ProFinder (Webpage, 2018)) at 1.</b></p> <p>Tell us what you need</p> <p>Answer a couple of questions about the services you're looking for and we'll introduce you to the best local professionals from our curated list.</p> <p>Get free proposals</p> <p>You'll receive up to 5 offers from professionals ready to help. Each offer will include a message, price quote, and access to the pro's profile.</p> <p><b>Id. at 4.</b></p>
<p>presenting the user with a plurality of categories from which the user may make a selection of a category from the</p>	<p>Plaintiff contends that in case of LinkedIn ProFinder, user can select at least one category from plurality of categories.</p>

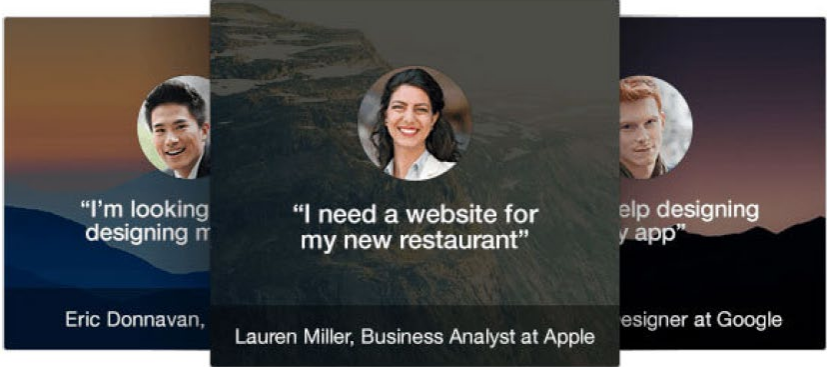
Exemplary Claim 10	Accused Product (or Service)
<p>plurality of categories;</p> <p>User can select at least one category from plurality of displayed categories</p>	 <p><b>[Snapshot taken after creating a user profile in LinkedIn.com website]</b></p>
<p>receiving the selection of the category by the user;</p> <p>in conjunction with the selection of the category, receiving an electronic communication from the user for an unidentified respondent, wherein the electronic communication contains an inquiry of the user, the inquiry specifying a</p>	<p>Plaintiff contends that user selects at least one category from plurality of categories. An inquiry message is also received from the user for unidentified respondent along with selection of the category. The inquiry also specifies a particular location of user's interest.</p> <p>Selection of the category by the user</p>

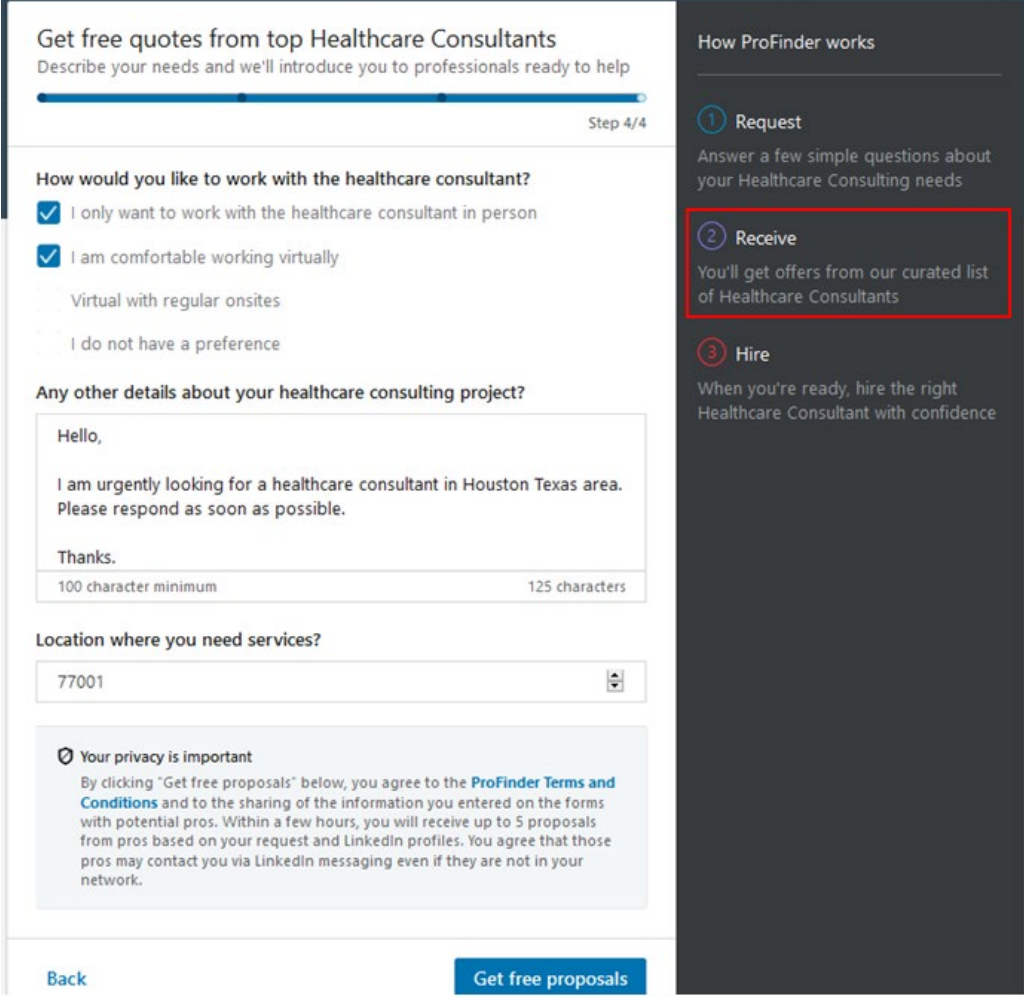
Exemplary Claim 10	Accused Product (or Service)
<p>particular location that corresponds to the geographic region of interest;</p>	 <p>The screenshot shows the ProFinder website interface. At the top, the ProFinder logo is visible. The main heading reads "Take your project from to-do to done" with the subtext "ProFinder helps you hire top local freelancers". Below this is a search bar containing the text "Healthcare Consulting" and a "Get started" button. A red arrow points from the search bar to the text "particular location that corresponds to the geographic region of interest;" in the adjacent column. Below the search bar, a horizontal menu lists various services: Popular Services, Executive Coach, Certified Public Accountant (CPA), Tax Consulting, Business Law, PR Consulting, and a "See all services" link. Underneath, a section titled "Achieve your career goals" features three service cards: "Review Your Resume and LinkedIn Profile" (500+ pros), "Professional Headshot Photography" (1600+ pros), and "Prepare for Your Interview" (1500+ pros). A speech bubble points to the "Review Your Resume and LinkedIn Profile" card with the text "Electronic communication from the user for an unidentified respondent".</p> <p>Electronic communication from the user for an unidentified respondent</p> <p>[Redacted] after creating a user profile in LinkedIn.com website]</p>



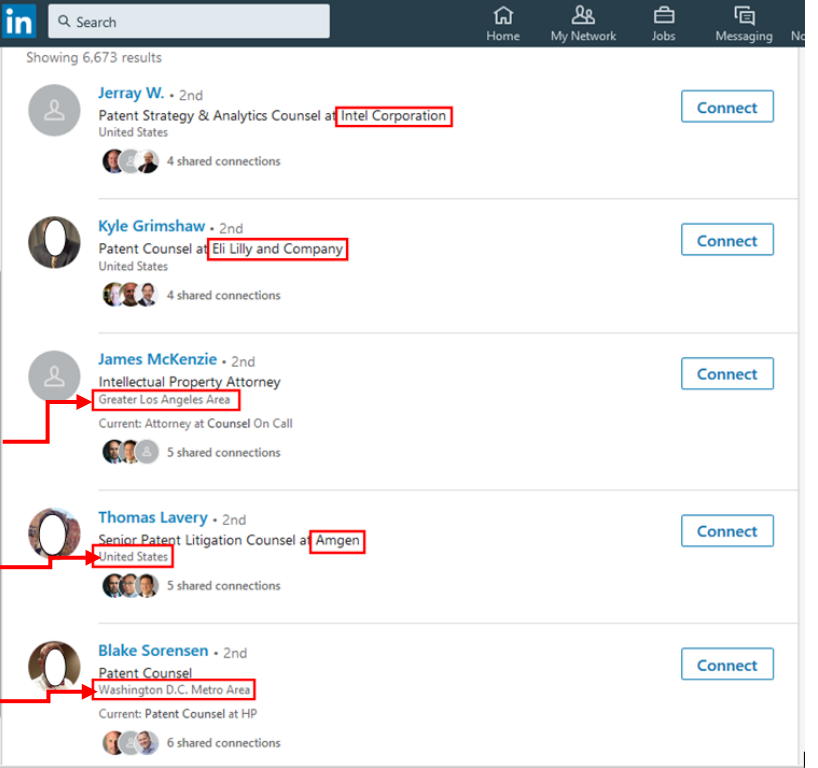
Exemplary Claim 10	Accused Product (or Service)
	<div data-bbox="402 352 620 520" style="border: 1px solid black; border-radius: 15px; padding: 5px; display: inline-block;">                     User's selection of the category                 </div>  <p data-bbox="402 1073 1360 1115"><b>[Snapshot taken after creating a user profile in LinkedIn.com website]</b></p>

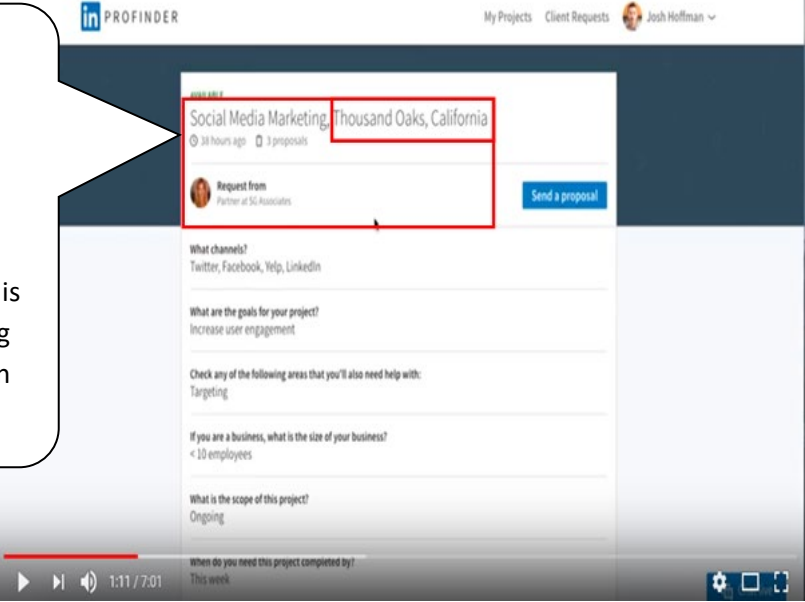
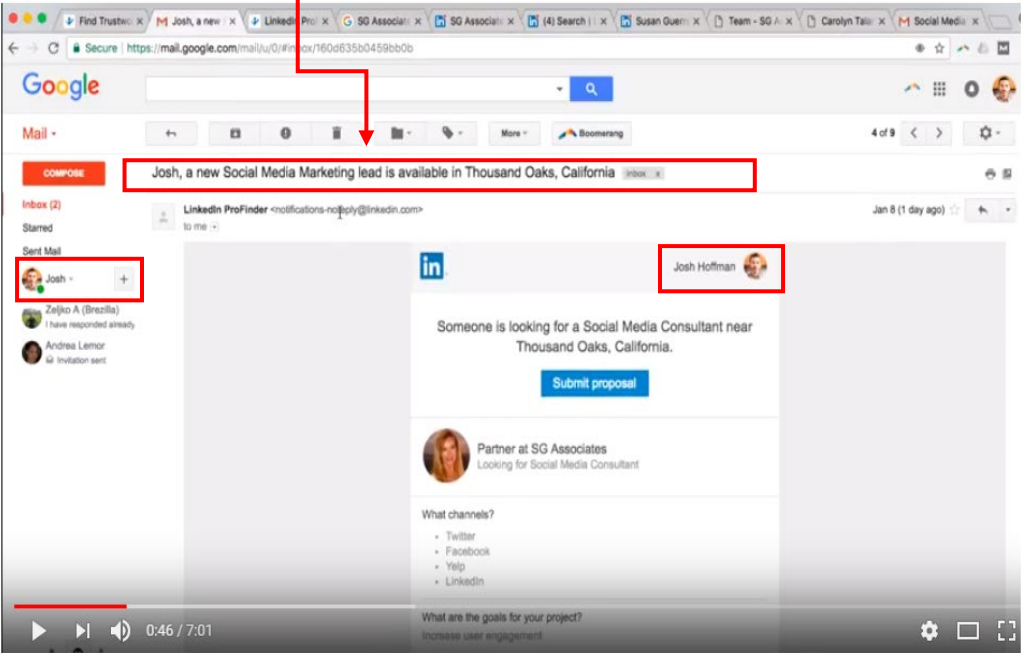
Exemplary Claim 10	Accused Product (or Service)
	<p>The inquiry specifies a particular location that corresponds to the geographic region of</p> <p>[Snapshot taken after creating a user profile in LinkedIn.com website]</p>
<p>after receiving the selection of the category by the user, programmatically making a selection of at least one participant for receiving the electronic communication based at least in part on (i) the selection of the category, (ii) the</p>	<p>Plaintiff contends that after receiving user’s selection of the category, LinkedIn ProFinder programmatically makes a selection of one or more participants based on user’s selection of the category and information associated with each participant profile including location identified by the biographic information of the participant corresponding to the particular location that is specified in the inquiry. The one or more participants are shortlisted for receiving the electronic communication containing inquiry of the user.</p> <p>LinkedIn ProFinder programmatically makes a selection of one or more participants or candidates based on user’s selection of the category and information associated with each participant profile including location identified by the biographic information of the participant that corresponds to the particular location that is specified in the inquiry and notifies the shortlisted participants through emails.</p>

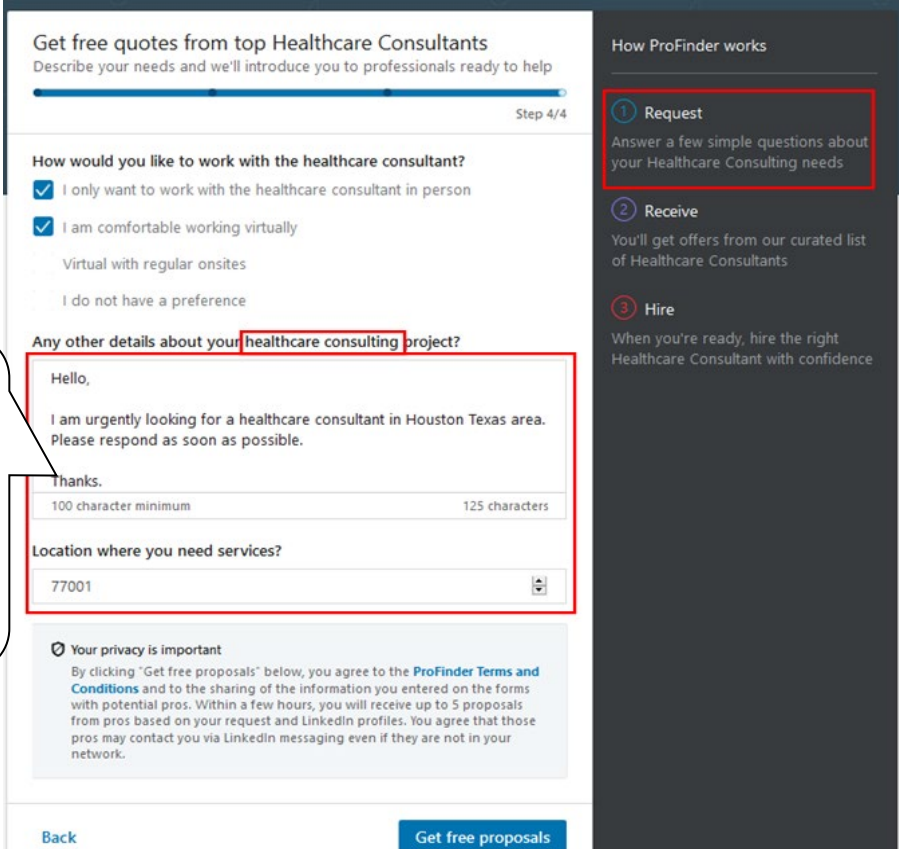
Exemplary Claim 10	Accused Product (or Service)
<p>information associated with the at least one participant, including the geographic region identified by the biographic information of the at least one participant corresponding to the particular location that is specified in the inquiry;</p>	<p>1. Get leads in your Inbox</p> <p>LinkedIn members will make a request for services they need. Once we find a request that matches your expertise, we'll send you an email.</p>  <p><b>Attachment 1 (Find Freelance Jobs &amp; Professional Opportunities - LinkedIn ProFinder (Webpage, 2018)) at 1.</b></p>

Exemplary Claim 10	Accused Product (or Service)
	 <p>The screenshot displays a web form titled "Get free quotes from top Healthcare Consultants". The form is at "Step 4/4" and asks how the user would like to work with a healthcare consultant. Two options are checked: "I only want to work with the healthcare consultant in person" and "I am comfortable working virtually". Below this, there is a text area for "Any other details about your healthcare consulting project?" containing a sample message. A location field shows "77001". A privacy notice is also present. On the right, a sidebar titled "How ProFinder works" shows a three-step process: 1. Request, 2. Receive (highlighted with a red box), and 3. Hire.</p> <p><b>Get free quotes from top Healthcare Consultants</b> Describe your needs and we'll introduce you to professionals ready to help</p> <p>Step 4/4</p> <p><b>How would you like to work with the healthcare consultant?</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> I only want to work with the healthcare consultant in person</li> <li><input checked="" type="checkbox"/> I am comfortable working virtually</li> <li><input type="checkbox"/> Virtual with regular onsite</li> <li><input type="checkbox"/> I do not have a preference</li> </ul> <p><b>Any other details about your healthcare consulting project?</b></p> <p>Hello,</p> <p>I am urgently looking for a healthcare consultant in Houston Texas area. Please respond as soon as possible.</p> <p>Thanks.</p> <p>100 character minimum 125 characters</p> <p><b>Location where you need services?</b></p> <p>77001</p> <p><b>Your privacy is important</b></p> <p>By clicking "Get free proposals" below, you agree to the <a href="#">ProFinder Terms and Conditions</a> and to the sharing of the information you entered on the forms with potential pros. Within a few hours, you will receive up to 5 proposals from pros based on your request and LinkedIn profiles. You agree that those pros may contact you via LinkedIn messaging even if they are not in your network.</p> <p><a href="#">Back</a> <a href="#">Get free proposals</a></p> <p><b>How ProFinder works</b></p> <ol style="list-style-type: none"> <li>1 Request Answer a few simple questions about your Healthcare Consulting needs</li> <li>2 <b>Receive</b> You'll get offers from our curated list of Healthcare Consultants</li> <li>3 Hire When you're ready, hire the right Healthcare Consultant with confidence</li> </ol>

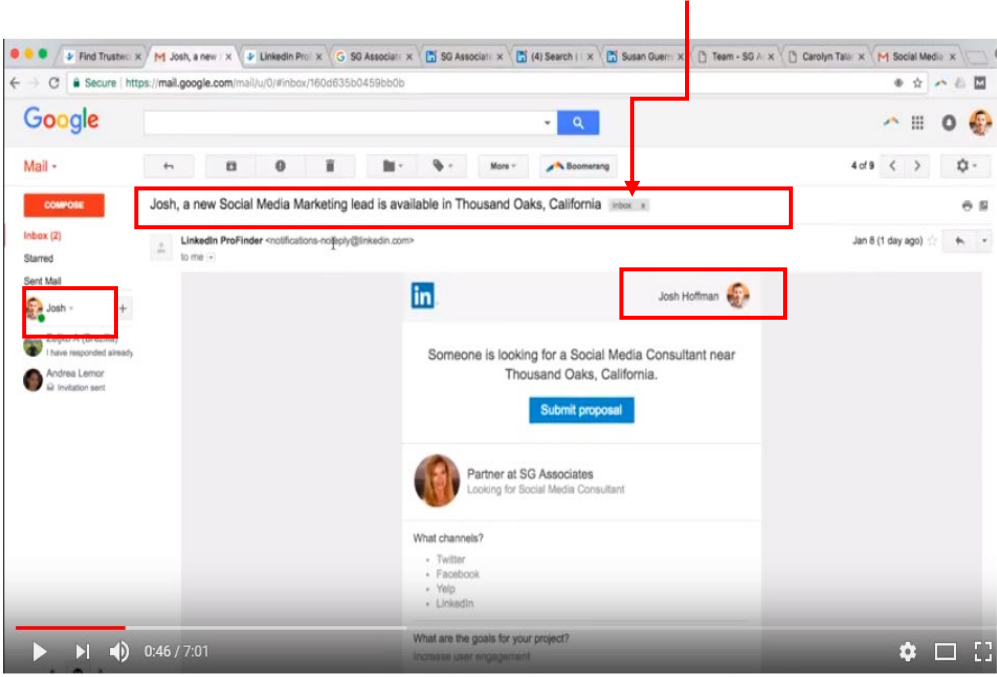
[Snapshot taken after creating a user profile in LinkedIn.com website]

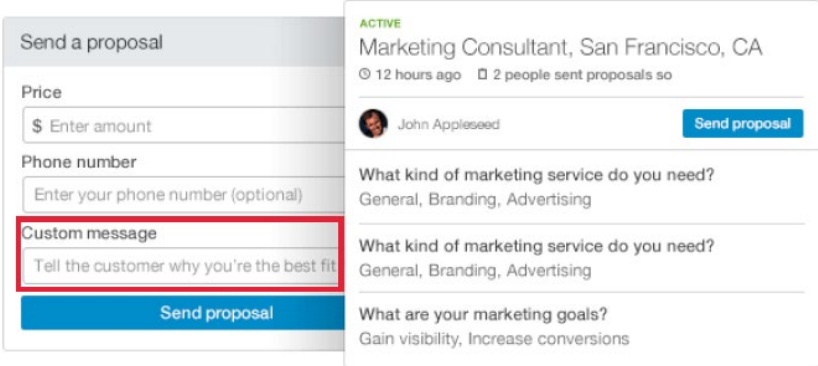
Exemplary Claim 10	Accused Product (or Service)
	<div data-bbox="396 506 630 1016" style="border: 1px solid black; border-radius: 15px; padding: 10px; width: fit-content;"> <p>The biographical information also identifies geographic region or location data associated with each participant or candidate.</p> </div>  <p>[Snapshot taken after creating a profile in LinkedIn.com website]</p> <p><b>LinkedIn ProFinder - Overview</b></p> <p>LinkedIn ProFinder is LinkedIn's professional services marketplace that helps you find the best freelance or independent professionals in your area. It's currently only available within the U.S. and within specific service categories.</p> <p>We aim to get you up to five responses from highly qualified, local professionals within 24 business hours of your request submission. Currently, LinkedIn members from any valid U.S. zip code can file a request for a service.</p> <p><b>Attachment 4 (LinkedIn ProFinder - Overview   LinkedIn Help (Webpage, 2018)) at 1.</b></p>

Exemplary Claim 10	Accused Product (or Service)
	<p data-bbox="483 304 651 699">User (by selecting at least one category) submits message containing his inquiry along with location information</p>  <p data-bbox="407 890 1230 926"><b>[Source: <a href="https://www.youtube.com/watch?v=vdcMv2OvsRE">https://www.youtube.com/watch?v=vdcMv2OvsRE</a>]</b></p> <p data-bbox="428 989 1373 1178">LinkedIn ProFinder programmatically makes a selection of one or more participants or candidates based on user’s selection of the category and information associated with each participant profile including location data and notifies the shortlisted participants through emails so that they can respond to user’s inquiry.</p> 

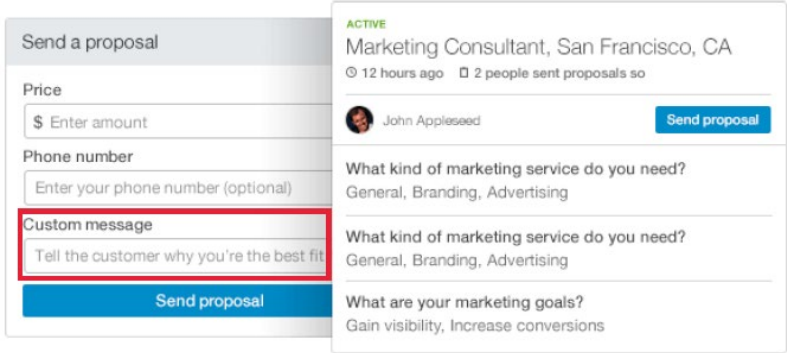
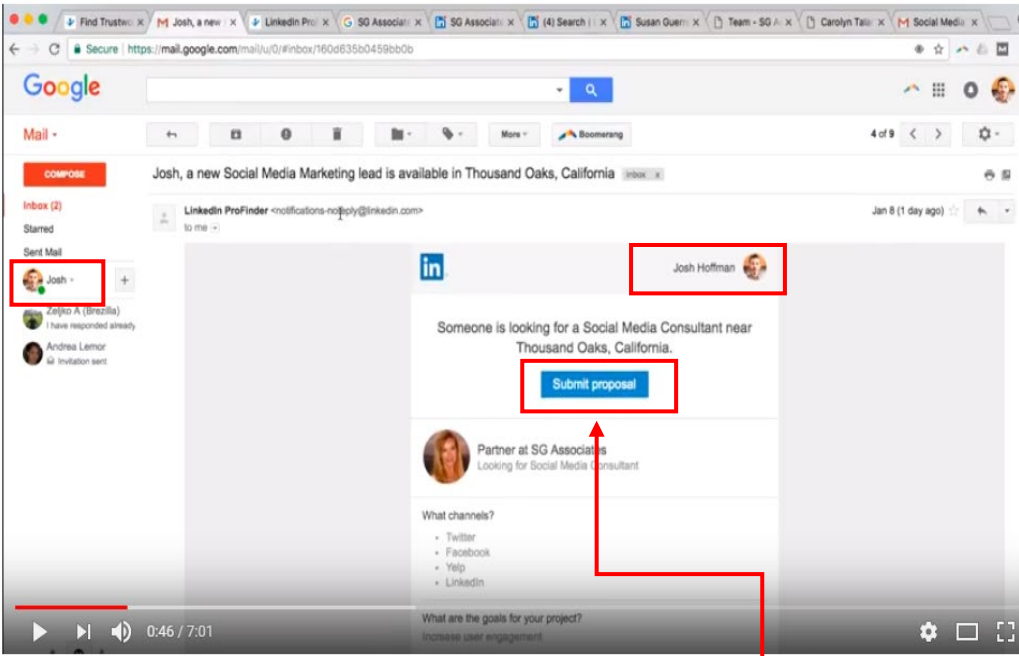
Exemplary Claim 10	Accused Product (or Service)
	[Source: <a href="https://www.youtube.com/watch?v=vdcMv2OvsRE">https://www.youtube.com/watch?v=vdcMv2OvsRE</a> ]
<p>sending the inquiry to one or more participants of the selection without identifying the one or more participants to the user;</p> <p>Electronic communication (containing inquiry) from the user for an unidentified respondent</p>	<p>Plaintiff contends that user’s inquiry message is not addressed to specific one or more respondents, that is, one or more respondents remain unidentified to the user. LinkedIn ProFinder programmatically selects and shortlists one or more participants and sends them user’s enquiry.</p> 

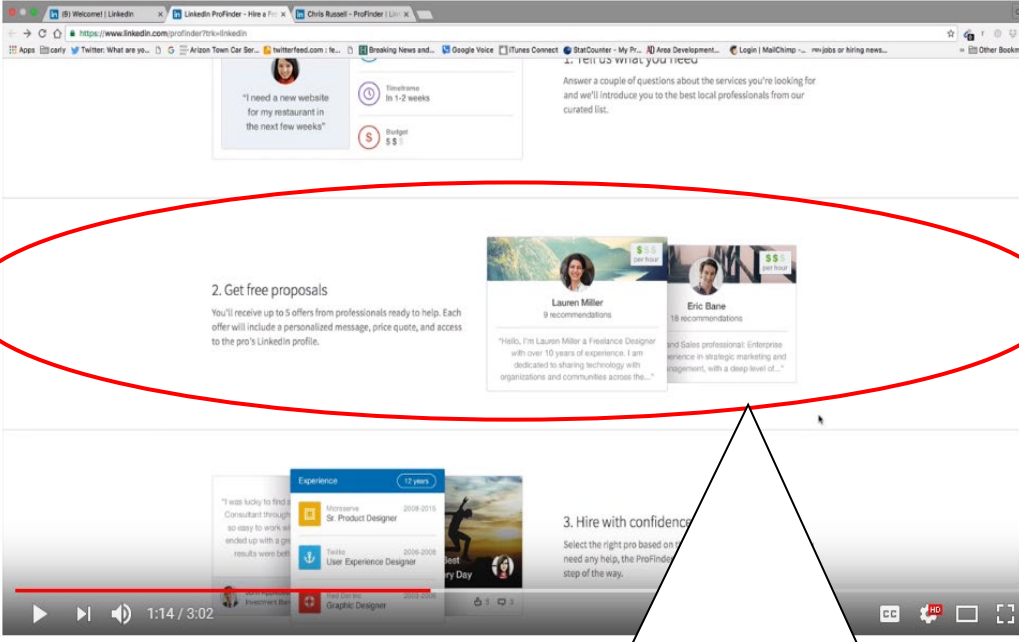


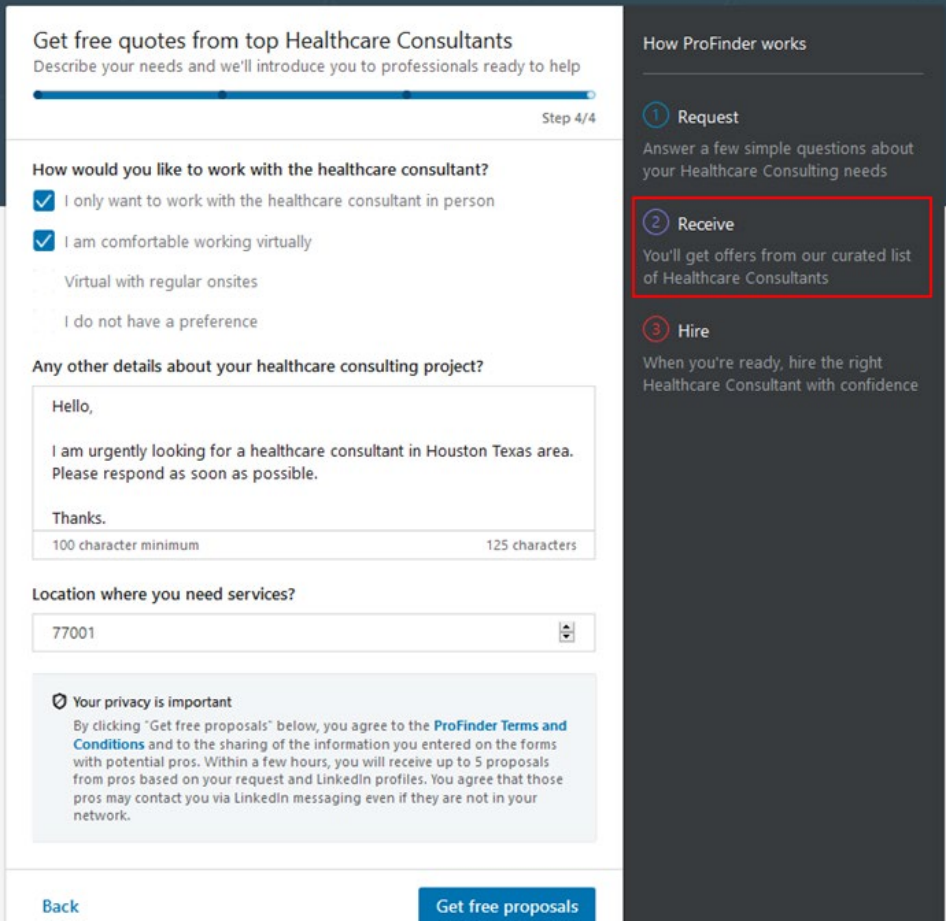
Exemplary Claim 10	Accused Product (or Service)
	<p data-bbox="407 428 1357 464"><b>[Snapshot taken after creating a user profile in LinkedIn.com website]</b></p> <div data-bbox="431 480 1370 548" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p data-bbox="451 499 1206 531">Sending the inquiry to one or more participants of the selection</p> </div>  <p data-bbox="407 1249 1235 1285"><b>[Source: <a href="https://www.youtube.com/watch?v=vdcMv2OvsRE">https://www.youtube.com/watch?v=vdcMv2OvsRE</a>]</b></p>
<p data-bbox="188 1318 380 1896">enabling any of the one or more participants to provide a response to the inquiry through use of an online communication forum, wherein each response includes information</p>	<p data-bbox="407 1318 1403 1430">Plaintiff contends that any of the one or more participants or candidates can provide response to the inquiry through use of a communication forum. Each response also includes information about the participant sending the response.</p>




Exemplary Claim 10	Accused Product (or Service)
<p>about the participant sending the response;</p>	<p style="text-align: center;"><b>2. Respond on your terms</b></p> <p style="text-align: center;">If you're interested in their request, respond to the member with a short proposal. They'll also get access to your full LinkedIn profile.</p>  <p><b>Attachment 1 (Find Freelance Jobs &amp; Professional Opportunities - LinkedIn ProFinder (Webpage, 2018)) at 2.</b></p> <p><b>LinkedIn ProFinder - Overview</b></p> <p>LinkedIn ProFinder is LinkedIn's professional services marketplace that helps you find the best freelance or independent professionals in your area. It's currently only available within the U.S. and within <a href="#">specific service categories</a>.</p> <p>We aim to get you up to five responses from highly qualified, local professionals within 24 business hours of your request submission. Currently, LinkedIn members from any valid U.S. zip code can file a request for a service.</p> <p><b>Attachment 4 (LinkedIn ProFinder - Overview   LinkedIn Help (Webpage, 2018)) at 1.</b></p> <div style="border: 1px solid black; border-radius: 15px; padding: 10px; width: fit-content; margin: 20px auto;"> <p>Each response also includes information about the participant sending the response.</p> </div>

Exemplary Claim 10	Accused Product (or Service)
	 <p>[Source: <a href="https://www.youtube.com/watch?v=bZqkIIKpINg">https://www.youtube.com/watch?v=bZqkIIKpINg</a>]</p>
<p>sending one or more electronic communications to the user that correspond to the response provided by each of the one or more participants, including (i) providing with the one or more electronic communications at least a portion of the biographical information associated with each</p>	<p>Plaintiff contends that each response from one or more participants is shared with the user along with the biographical information, while the contact details remain hidden from the user.</p> <div style="border: 1px solid black; border-radius: 15px; padding: 10px; margin-top: 20px;"> <p>The contact details of each participant such as emails, messaging ID, etc. remain hidden from the user while submitting the response. Although user can separately share phone number in the response, but that feature is an optional feature. By default, only LinkedIn profile without any contact information such as emails, messaging ID, etc. is shared with the user.</p> </div>

Exemplary Claim 10	Accused Product (or Service)
<p>participant, (ii) while enabling at least one of that participant's identity or contact information to be shielded from the user;</p>	<p style="text-align: center;"><b>2. Respond on your terms</b></p> <p style="text-align: center;">If you're interested in their request, respond to the member with a short proposal. They'll also get access to your full LinkedIn profile.</p>  <p><b>Attachment 1 (Find Freelance Jobs &amp; Professional Opportunities - LinkedIn ProFinder (Webpage, 2018)) at 2.</b></p>  <p>[Source: <a href="https://www.youtube.com/watch?v=vdcMv2OvsRE">https://www.youtube.com/watch?v=vdcMv2OvsRE</a>]</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>Each participant can submit the response as proposal</p> </div>

Exemplary Claim 10	Accused Product (or Service)
	 <p data-bbox="716 216 1117 247"><b>Accused Product (or Service)</b></p> <p data-bbox="618 352 737 411">"I need a new website for my restaurant in the next few weeks"</p> <p data-bbox="618 554 737 573">2. Get free proposals</p> <p data-bbox="618 583 870 621">You'll receive up to 5 offers from professionals ready to help. Each offer will include a personalized message, price quote, and access to the pro's LinkedIn profile.</p> <p data-bbox="894 512 1068 663"><b>Lauren Miller</b> 9 recommendations "Hello, I'm Lauren Miller a Freelance Designer with over 10 years of experience. I am dedicated to sharing technology with organizations and communities across the..."</p> <p data-bbox="1073 512 1247 663"><b>Eric Bane</b> 18 recommendations "and Sales professional. Enterprise experience in strategic marketing and engagement, with a deep level of..."</p> <p data-bbox="618 772 737 831">3. Hire with confidence</p> <p data-bbox="618 835 870 854">Select the right pro based on need any help, the ProFinder step of the way.</p> <p data-bbox="480 957 1373 1026">At least some portion of the biographical information of each participant is also shared along with the response.</p> <p data-bbox="407 1087 1214 1121"><b>[Source: <a href="https://www.youtube.com/watch?v=bZqkIIKplNg">https://www.youtube.com/watch?v=bZqkIIKplNg</a>]</b></p>

Exemplary Claim 10	Accused Product (or Service)
	 <p><b>Get free quotes from top Healthcare Consultants</b> Describe your needs and we'll introduce you to professionals ready to help Step 4/4</p> <p><b>How would you like to work with the healthcare consultant?</b></p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> I only want to work with the healthcare consultant in person</li> <li><input checked="" type="checkbox"/> I am comfortable working virtually             <ul style="list-style-type: none"> <li><input type="checkbox"/> Virtual with regular onsites</li> <li><input type="checkbox"/> I do not have a preference</li> </ul> </li> </ul> <p><b>Any other details about your healthcare consulting project?</b></p> <p>Hello,</p> <p>I am urgently looking for a healthcare consultant in Houston Texas area. Please respond as soon as possible.</p> <p>Thanks.</p> <p>100 character minimum 125 characters</p> <p><b>Location where you need services?</b></p> <p>77001</p> <p><input checked="" type="checkbox"/> <b>Your privacy is important</b> By clicking "Get free proposals" below, you agree to the <a href="#">ProFinder Terms and Conditions</a> and to the sharing of the information you entered on the forms with potential pros. Within a few hours, you will receive up to 5 proposals from pros based on your request and LinkedIn profiles. You agree that those pros may contact you via LinkedIn messaging even if they are not in your network.</p> <p><a href="#">Back</a> <a href="#">Get free proposals</a></p> <p><b>How ProFinder works</b></p> <ol style="list-style-type: none"> <li>1 <b>Request</b> Answer a few simple questions about your Healthcare Consulting needs</li> <li>2 <b>Receive</b> You'll get offers from our curated list of Healthcare Consultants</li> <li>3 <b>Hire</b> When you're ready, hire the right Healthcare Consultant with confidence</li> </ol>
<p>performing one or more actions to monitor at least one of the participants when that participant communicates with the user, including enabling the user to provide a feedback</p>	<p><b>[Snapshot taken after creating a user profile in LinkedIn.com website]</b></p> <p>Plaintiff contends that each participant activity while communicating with the user is monitored which includes enabling the user to provide a feedback to one or more participants, the feedback including an indication from the user about a quality of the response received from the one participant.</p> <p style="text-align: center;"><b>3. Get hired</b></p> <p style="text-align: center;">If your offer fits the member's needs, they'll reach out and start a conversation.</p> <p>***</p>

Exemplary Claim 10	Accused Product (or Service)
<p>about the one participants, the feedback including an indication from the user about a quality of the response from the one participant.</p>	<div data-bbox="412 268 1433 730" style="border: 1px solid #ccc; padding: 10px;"> <div style="background-color: #0070c0; color: white; text-align: center; padding: 5px; border: 1px solid red;">Conversation with John Appleseed</div> <div style="margin-top: 10px;">  <div style="background-color: #f0f0f0; padding: 10px; border-radius: 10px; width: 80%;">                     Thanks for reaching out, Ericka! Sounds great, what next steps should we take to start working together?                 </div> <div style="text-align: left; margin-top: 5px; font-size: 0.9em;">TODAY 3:15 PM</div> <div style="background-color: #0070c0; color: white; padding: 10px; border-radius: 10px; width: 80%; margin-top: 10px;">                     Hi John, thank you for the quick reply! Let's set up some time for us to go through your project over the phone.                 </div> <div style="text-align: right; margin-top: 5px; font-size: 0.8em;">TODAY 4:15 PM</div> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <input style="width: 90%; border: none;" type="text" value="Type a message..."/> <div style="float: right; text-align: center;">   <span style="background-color: #0070c0; color: white; padding: 2px 10px; border-radius: 5px; margin-left: 10px;">Send</span> </div> </div> </div> </div> <div data-bbox="406 758 1312 831" style="margin-top: 20px;"> <p><b>Attachment 1 (Find Freelance Jobs &amp; Professional Opportunities - LinkedIn ProFinder (Webpage, 2018)) at 2 and 3.</b></p> </div> <div data-bbox="415 905 1406 938" style="background-color: yellow; padding: 5px; margin-top: 20px;"> <p><b>Rating and Reviewing Your Professional with LinkedIn ProFinder Experiences</b></p> </div> <div data-bbox="412 955 1433 1041" style="padding: 5px; margin-top: 5px;"> <p>You can provide feedback on your LinkedIn ProFinder projects using ProFinder Experiences. Leveraging feedback and past experiences makes it easy to find top talent for your next project. Sharing this information with other professionals is essential to the growth of our marketplace, whatever your experience.</p> </div> <div data-bbox="412 1060 1411 1089" style="padding: 5px; margin-top: 5px;"> <p>There are two ways you can provide feedback regarding your experience working with a ProFinder professional:</p> </div> <div data-bbox="454 1106 1261 1171" style="list-style-type: none; padding-left: 20px; margin-top: 5px;"> <ul style="list-style-type: none"> <li>• <b>Rating scale</b> – Assess your experience using a 5-star scale</li> <li>• <b>Comments</b> – Leave an optional comment providing more details about your experience</li> </ul> </div> <div data-bbox="412 1188 1427 1272" style="padding: 5px; margin-top: 5px;"> <p>The ProFinder Experiences feature is available for projects where you're in-conversation with a pro via the ProFinder platform. Once the conversation begins, you'll receive a reminder notification within two weeks asking you to rate your experience.</p> </div> <div data-bbox="412 1291 1401 1348" style="padding: 5px; margin-top: 5px;"> <p>If you provide a star rating only, your identity will remain anonymous. However, if you also provide a comment LinkedIn will make both your rating and comment public.</p> </div> <div data-bbox="399 1367 1373 1442" style="margin-top: 20px;"> <p><b>Attachment 3 (Rating and Reviewing Your Professional with LinkedIn ProFinder Experiences   ProFinder Help (Webpage, 2018)) at 1.</b></p> </div> <div data-bbox="399 1472 1438 1612" style="border: 1px solid #ccc; border-radius: 15px; padding: 15px; margin-top: 10px;"> <p>User can provide a feedback about the participant which includes an indication from the user about a quality of the response from the participant.</p> </div>



Exemplary Claim 10	Accused Product (or Service)
	<p data-bbox="415 279 1317 344"><b>Professional Ratings and Reviews Received</b> from LinkedIn ProFinder Experiences</p> <p data-bbox="415 369 1406 453">As a <b>LinkedIn ProFinder</b> pro, you may receive a rating and review for the work you've completed. Your 5-star rating score is a measure of satisfaction to your clients and your overall success on ProFinder. Delivering top-quality work will result in higher ratings, which will help you promote your business and win more leads.</p> <p data-bbox="415 474 1433 558">After responding to your proposal, clients will receive an email notification asking them to rate their experience. Clients have the ability to rate you using a 5-star scale and leave comments. Your score will reflect your overall client rating history, which is measure by the feedback received from members.</p> <p data-bbox="406 583 1409 653"><b>Attachment 2 (Professional Ratings and Reviews Received from LinkedIn ProFinder Experiences   ProFinder Help (Webpage, 2018)) at 1.</b></p>

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

17. LinkedIn has and continues to induce infringement. LinkedIn 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 LinkedIn Profinder products and services (e.g., social networking site focused on business and professional networking) and related services that provide social networking site focused on business and professional networking across the Internet such as to cause infringement of claims 1–14 of the '344 patent, literally or under the doctrine of equivalents. Moreover, LinkedIn has known of the '344 patent and the technology underlying it from at least the date of issuance of the patent.

18. LinkedIn has caused and will continue to cause NETSOC damage by direct and indirect infringement of (including inducing infringement of) the claims of the '344 patent.

## V. JURY DEMAND

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

## VI. PRAYER FOR RELIEF

- WHEREFORE, NETSOC prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '107 patent through linkedin.com;
- b. enter judgment that Defendant has infringed the claims of the '344 patent through linkedin.com;
- c. award NETSOC damages in an amount sufficient to compensate it for Defendant's infringement of the '107 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;
- d. award NETSOC damages in an amount sufficient to compensate it for Defendant's infringement of the '344 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;
- e. award NETSOC 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;
- f. declare this case to be "exceptional" under 35 U.S.C. § 285 and award NETSOC its attorneys' fees, expenses, and costs incurred in this action;
- g. 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;
- h. 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

- i. award NETSOC such other and further relief as this Court deems just and proper.

Respectfully submitted,

**Ramey & Schwaller, LLP**

By: /s/ David Hoffman

David Hoffman  
17 Battery Place, Suite 1308  
New York, New York 10004  
(212) 488-1771 (telephone)  
(832) 900-4941 (fax)  
dhoffman@rameyfirm.com

William P. Ramey, III  
(motion *pro hac vice* pending)  
Texas Bar No. 24027643  
5020 Montrose Blvd., Suite 750  
Houston, Texas 77006  
(713) 426-3923 (telephone)  
(832) 900-4941 (fax)  
wramey@rameyfirm.com

***Attorneys for NetSoc, LLC***