

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

<b>NETSOC, LLC,</b>	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>C.A. No. 1:18-CV-10262-RA</b>
	)	<b>(LEAD CONSOLIDATED CASE)</b>
	)	
<b>CHEGG, INC.</b>	)	
<b>Defendant.</b>	)	

<b>NETSOC, LLC,</b>	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>C.A. No. 1:18-CV-12250-RA</b>
	)	<b>(CONSOLIDATED CASE)</b>
	)	
<b>QUORA, INC.</b>	)	
<b>Defendant.</b>	)	<b>JURY TRIAL DEMANDED</b>

**PLAINTIFF’S FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

NetSoc, LLC (“NetSoc”) files this First Amended Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,218,591 by Quora, Inc., 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, Quora, Inc. (“Quora”) is a domestic corporation organized and existing under the laws of Delaware, with a principal place of business located IN NEW York, New York. Quora may be served through its registered agent at CT Corporation System, 111 Eighth Avenue, New York, New York, 10011. On information and belief, Quora sells and offers to sell products and services throughout New York, including in this judicial district, and

introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in New York and this judicial district.

### **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 principal, physical place of business at 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. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or

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

**II. INFRINGEMENT ('591 Patent)**

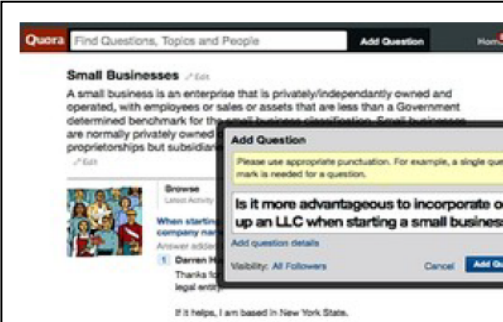
7. On December 22, 2015, U.S. Patent No. 9,218,591 (“the ‘591 patent”, attached as Exhibit A) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ‘591 patent by assignment.





































8. The ‘591 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.

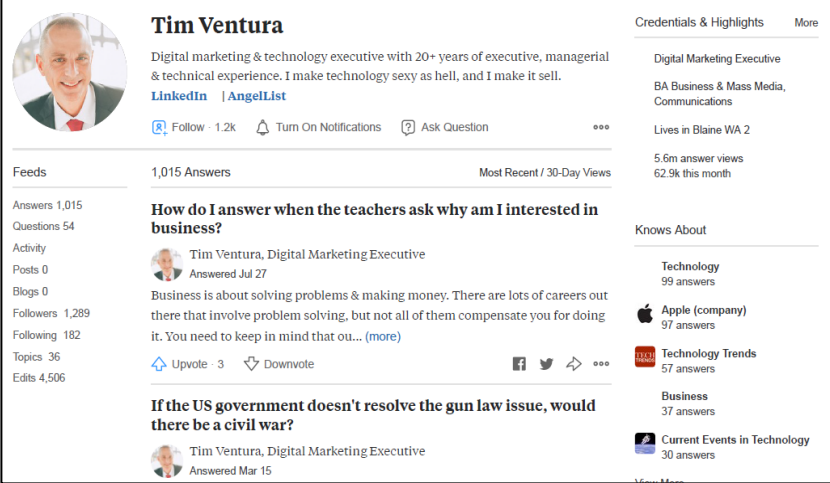
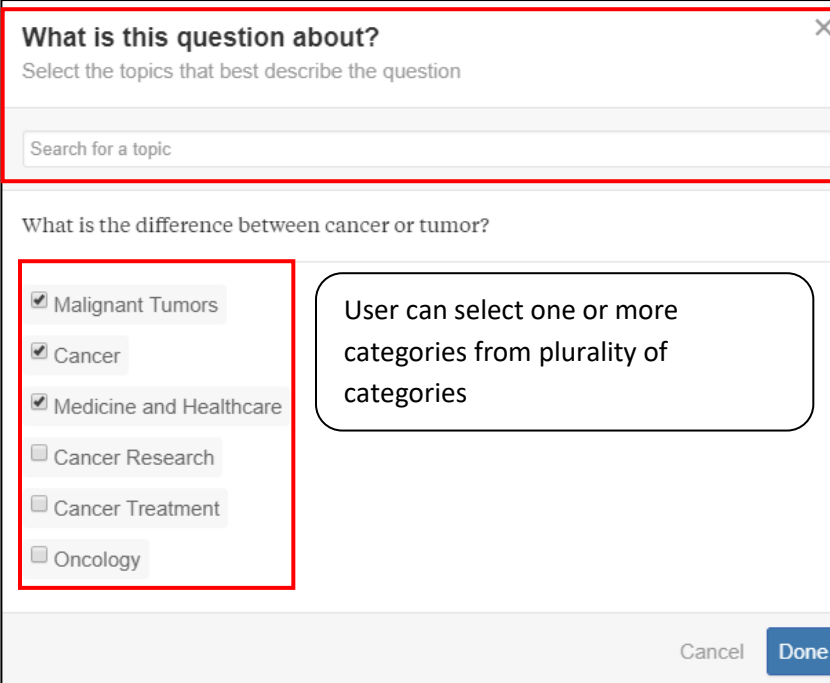
9. Quora maintains, operates, and administers a website at [www.quora.com](http://www.quora.com) that infringes one or more claims of the ‘591 patent, including at least claims 1-8, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘591 Patent into service (i.e., 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:

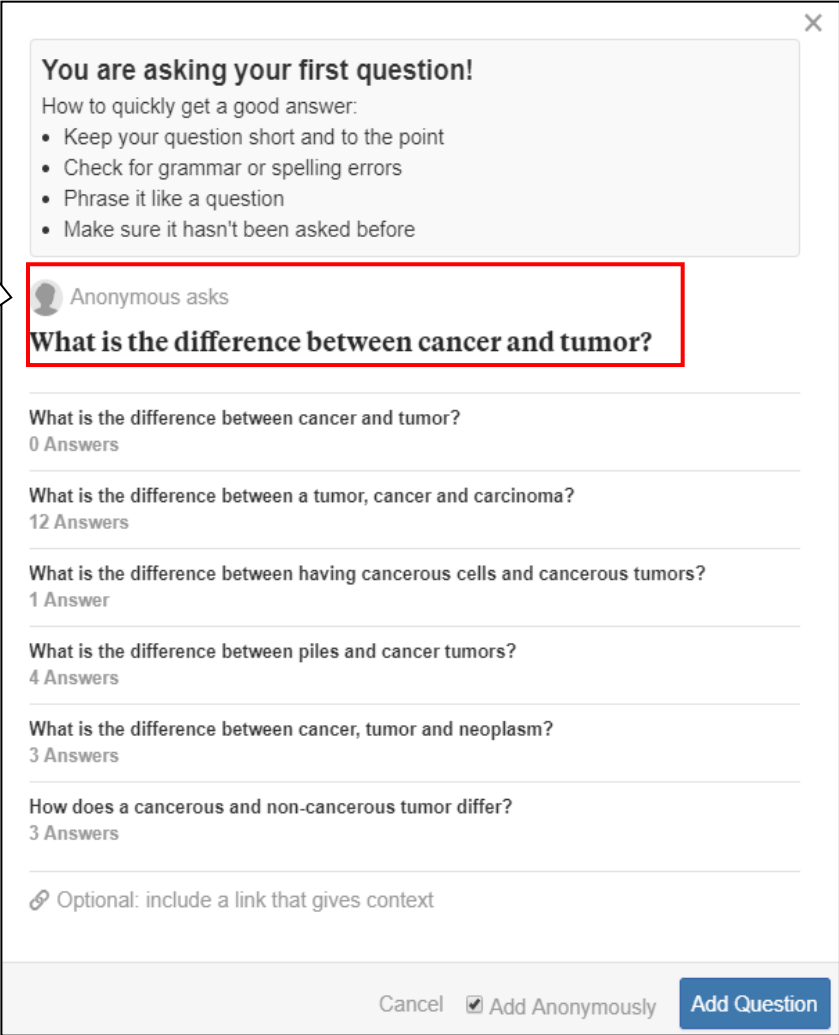
Claim 1	Accused Product or Service
1. A method for establishing a social network, the method comprising:	Plaintiff contends that Quora Service offers a method of social network.

Claim 1	Accused Product or Service
	<p data-bbox="607 275 1425 384"><b>A New Social Network Where Inquiring Minds Run Wild</b></p> <p data-bbox="613 415 1430 520">If brief communications like Twitter’s 140-character messages, Facebook status updates and text messaging leave you longing for more substantial discourse, you may be in luck. This week, I took a look at <b>Quora, a question-and-answer site</b> that encourages thoughtful—even long-winded—discussions.</p> <p data-bbox="613 548 1419 625"><b>Quora (Quora.com)</b> was launched about six months ago by two former Facebook employees who wanted to create a forum where in-depth questions could be posed and answered. Users</p> <div data-bbox="602 657 1430 1031">  <p data-bbox="1214 657 1425 846"><b>Quora’s combination of social networking</b> (following topics and people) and in-depth answers helps differentiate it from those services.</p> <p data-bbox="1214 873 1430 1031">Private messages can be sent from one user to another through Quora, and new messages are indicated with a red number that appears</p> <p data-bbox="613 982 1198 1003"><b>Quora encourages users to ask or answer questions</b> or to simply read about topics of interest.</p> </div> <p data-bbox="597 1062 1349 1136"><b>Attachment 1 (A New Social Network Where Inquiring Minds Run Wild - WSJ (Webpage, 2011)) at 1 and 2.</b></p>
<p data-bbox="201 1178 561 1759">maintaining 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 data-bbox="597 1178 1398 1293">Plaintiff contends that with the help of data-centers or servers, Quora maintains data of plurality of participants or individuals along with their information.</p> <div data-bbox="656 1377 1370 1801"> <p data-bbox="672 1388 1354 1791"><b>Amazon.com, besides its vast online store, also rents out computing power to startups like Quora, so they don't have to buy servers and lease space in data centers themselves.</b> The division is called Amazon Web Services, and one of its key offerings is the Elastic Compute Cloud, or EC2.</p> </div>

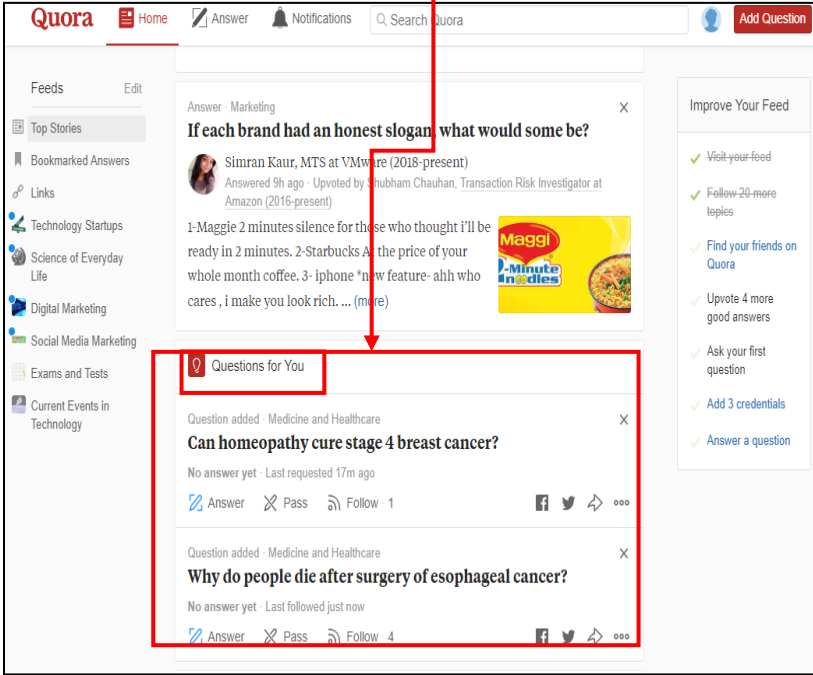
Claim 1	Accused Product or Service												
	<p data-bbox="597 268 1412 342"><b>Attachment 2 (A Lot Of Quora's \$50 Million Is Going Straight To Amazon - Business Insider (Webpage, 2012)) at</b></p> <div data-bbox="597 352 1429 457" style="border: 1px solid black; border-radius: 10px; padding: 10px;"><p data-bbox="618 369 1391 436">Quora stores and maintains a list of its participants or customers along with their associated information.</p></div> <div data-bbox="597 520 1429 1245" style="border: 1px solid black; padding: 10px;"><table border="0"><tbody><tr><td data-bbox="609 541 971 646"><b>Tim Ventura</b> View 30 Answers <a href="#">Follow 1.2k</a></td><td data-bbox="995 541 1357 646"><b>Madhukar</b> Programmer   Outdoor Enthusiast   Thi... View 19 Answers <a href="#">Follow 244</a></td></tr><tr><td data-bbox="609 667 971 772"><b>Francisco Fonseca</b> "A usefual servant but dangerous master..." View 11 Answers <a href="#">Follow 367</a></td><td data-bbox="995 667 1357 772"><b>Pujitha P</b> Marketing and Communications Manager View 14 Answers <a href="#">Follow 37</a></td></tr><tr><td data-bbox="609 793 971 898"><b>Garima Nayyar</b> Marketing Manager View 23 Answers <a href="#">Follow 170</a></td><td data-bbox="995 793 1357 898"><b>Armaan Agrawal</b> Top Writer 2018. Tokyoite. View 9 Answers <a href="#">Follow 270</a></td></tr><tr><td data-bbox="609 919 971 1024"><b>Ernest W. Adams</b> Game Design Consultant, Author, and ... View 8 Answers <a href="#">Follow 72.8k</a></td><td data-bbox="995 919 1357 1024"><b>Smith Kelly</b> Business lover, dubai View 11 Answers <a href="#">Follow 18</a></td></tr><tr><td data-bbox="609 1045 971 1150"><b>Sagar Solanki</b> CEO of My Home View 9 Answers <a href="#">Follow 251</a></td><td data-bbox="995 1045 1357 1150"><b>C.J. Windisch</b> Engineer. Maker. Robotcist. View 8 Answers <a href="#">Follow 339</a></td></tr><tr><td data-bbox="609 1171 971 1276"><b>Michael Soareverix</b> The Unnamed Hero View 6 Answers <a href="#">Follow 2.6k</a></td><td data-bbox="995 1171 1357 1276"><b>Karen Kolkey</b> 15, Entrepreneur, UC Berkeley student View 9 Answers <a href="#">Follow 1.9k</a></td></tr></tbody></table></div> <p data-bbox="597 1276 1412 1350"><b>Attachment 3 (Current Events in Technology - Followers - Quora (Webpage, 2018)) at 1.</b></p> <div data-bbox="597 1381 1429 1486" style="border: 1px solid black; border-radius: 10px; padding: 10px;"><p data-bbox="618 1409 1326 1476">Information associated with each participant or individual is stored and maintained.</p></div>	 <b>Tim Ventura</b> View 30 Answers <a href="#">Follow 1.2k</a>	 <b>Madhukar</b> Programmer   Outdoor Enthusiast   Thi... View 19 Answers <a href="#">Follow 244</a>	 <b>Francisco Fonseca</b> "A usefual servant but dangerous master..." View 11 Answers <a href="#">Follow 367</a>	 <b>Pujitha P</b> Marketing and Communications Manager View 14 Answers <a href="#">Follow 37</a>	 <b>Garima Nayyar</b> Marketing Manager View 23 Answers <a href="#">Follow 170</a>	 <b>Armaan Agrawal</b> Top Writer 2018. Tokyoite. View 9 Answers <a href="#">Follow 270</a>	 <b>Ernest W. Adams</b> Game Design Consultant, Author, and ... View 8 Answers <a href="#">Follow 72.8k</a>	 <b>Smith Kelly</b> Business lover, dubai View 11 Answers <a href="#">Follow 18</a>	 <b>Sagar Solanki</b> CEO of My Home View 9 Answers <a href="#">Follow 251</a>	 <b>C.J. Windisch</b> Engineer. Maker. Robotcist. View 8 Answers <a href="#">Follow 339</a>	 <b>Michael Soareverix</b> The Unnamed Hero View 6 Answers <a href="#">Follow 2.6k</a>	 <b>Karen Kolkey</b> 15, Entrepreneur, UC Berkeley student View 9 Answers <a href="#">Follow 1.9k</a>
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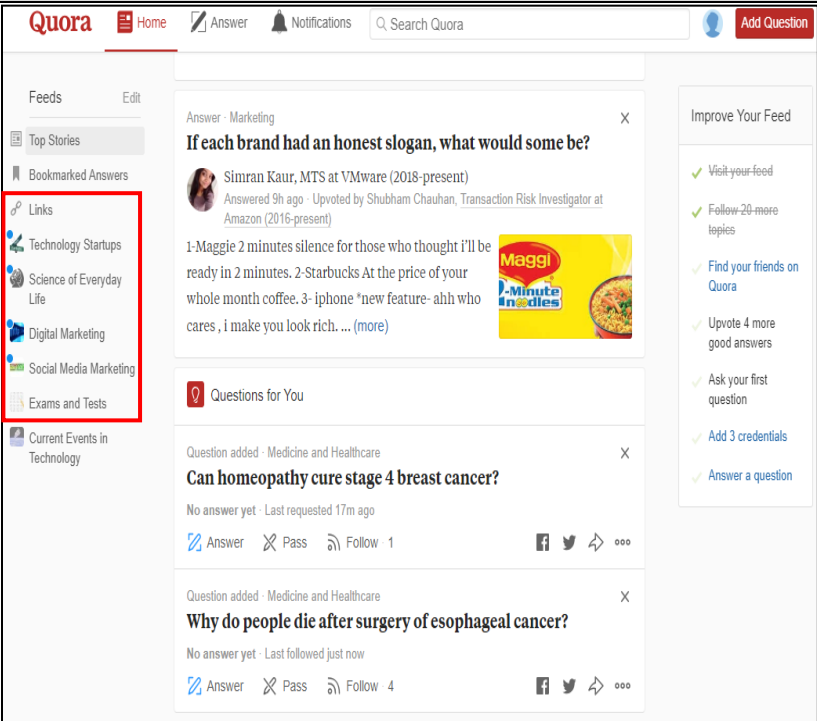
Claim 1	Accused Product or Service
	 <p><b>Tim Ventura</b> Digital marketing &amp; technology executive with 20+ years of executive, managerial &amp; technical experience. I make technology sexy as hell, and I make it sell. <a href="#">LinkedIn</a>   <a href="#">AngelList</a></p> <p>Follow 1.2k · Turn On Notifications · Ask Question</p> <p>1,015 Answers · Most Recent / 30-Day Views</p> <p><b>How do I answer when the teachers ask why am I interested in business?</b> Tim Ventura, Digital Marketing Executive · Answered Jul 27 Business is about solving problems &amp; making money. There are lots of careers out there that involve problem solving, but not all of them compensate you for doing it. You need to keep in mind that ou... (more)</p> <p><b>If the US government doesn't resolve the gun law issue, would there be a civil war?</b> Tim Ventura, Digital Marketing Executive · Answered Mar 15</p> <p>Topics: Technology (99 answers) Apple (company) (97 answers) Technology Trends (57 answers) Business (37 answers) Current Events in Technology (30 answers)</p>
<p>presenting a user with a plurality of categories from which the user may make a selection of a category from the plurality of categories;</p>	<p><b>Attachment 4 (Tim Ventura - Quora (Webpage, 2018)) at 1.</b></p> <p>Plaintiff contends that user (or asker) is presented with plurality of categories from which the user can select one or more categories.</p>  <p><b>What is this question about?</b> Select the topics that best describe the question</p> <p>Search for a topic</p> <p>What is the difference between cancer or tumor?</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Malignant Tumors</li> <li><input checked="" type="checkbox"/> Cancer</li> <li><input checked="" type="checkbox"/> Medicine and Healthcare</li> <li><input type="checkbox"/> Cancer Research</li> <li><input type="checkbox"/> Cancer Treatment</li> <li><input type="checkbox"/> Oncology</li> </ul> <p>Cancel Done</p> <p><b>[Snapshot taken after creating a user profile in Quora.com]</b></p>

Claim 1	Accused Product or Service
<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;</p>	<p>Plaintiff contends that user can select one or more categories as well as can describe his inquiry as a message, which is posted on the Quora. Also, the respondents or answerers remain unidentified.</p> <div data-bbox="591 783 1403 884" style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 10px 0;"><p>User can select one or more categories from plurality of categories</p></div> <div data-bbox="613 926 1414 1631" style="border: 1px solid black; padding: 10px; margin: 10px 0;"><p><b>What is this question about?</b> <span style="float: right;">×</span></p><p>Select the topics that best describe the question</p><div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 10px;">Search for a topic</div><div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 10px;">What is the difference between cancer or tumor?</div><ul style="list-style-type: none"><li><input checked="" type="checkbox"/> Malignant Tumors</li><li><input checked="" type="checkbox"/> Cancer</li><li><input checked="" type="checkbox"/> Medicine and Healthcare</li><li><input type="checkbox"/> Cancer Research</li><li><input type="checkbox"/> Cancer Treatment</li><li><input type="checkbox"/> Oncology</li></ul><div style="text-align: right;"><span>Cancel</span> <span style="background-color: #007bff; color: white; padding: 2px 10px; border-radius: 4px;">Done</span></div></div> <p><b>[Snapshot taken after creating a user profile in Quora.com]</b></p>

Claim 1	Accused Product or Service
<p>Electronic communication from the user for an unidentified respondent which contains an inquiry of the user</p>	 <p><b>You are asking your first question!</b> How to quickly get a good answer:</p> <ul style="list-style-type: none"> <li>• Keep your question short and to the point</li> <li>• Check for grammar or spelling errors</li> <li>• Phrase it like a question</li> <li>• Make sure it hasn't been asked before</li> </ul> <p>Anonymous asks <b>What is the difference between cancer and tumor?</b></p> <p>What is the difference between cancer and tumor? 0 Answers</p> <p>What is the difference between a tumor, cancer and carcinoma? 12 Answers</p> <p>What is the difference between having cancerous cells and cancerous tumors? 1 Answer</p> <p>What is the difference between piles and cancer tumors? 4 Answers</p> <p>What is the difference between cancer, tumor and neoplasm? 3 Answers</p> <p>How does a cancerous and non-cancerous tumor differ? 3 Answers</p> <p>Optional: include a link that gives context</p> <p>Cancel <input checked="" type="checkbox"/> Add Anonymously <b>Add Question</b></p> <p><b>[Snapshot taken after creating a user profile in Quora.com]</b></p>
<p>after receiving the selection of the category by the</p>	<p>Plaintiff contends that based on the selection of the category by the user or based on the information associated (for example,</p>

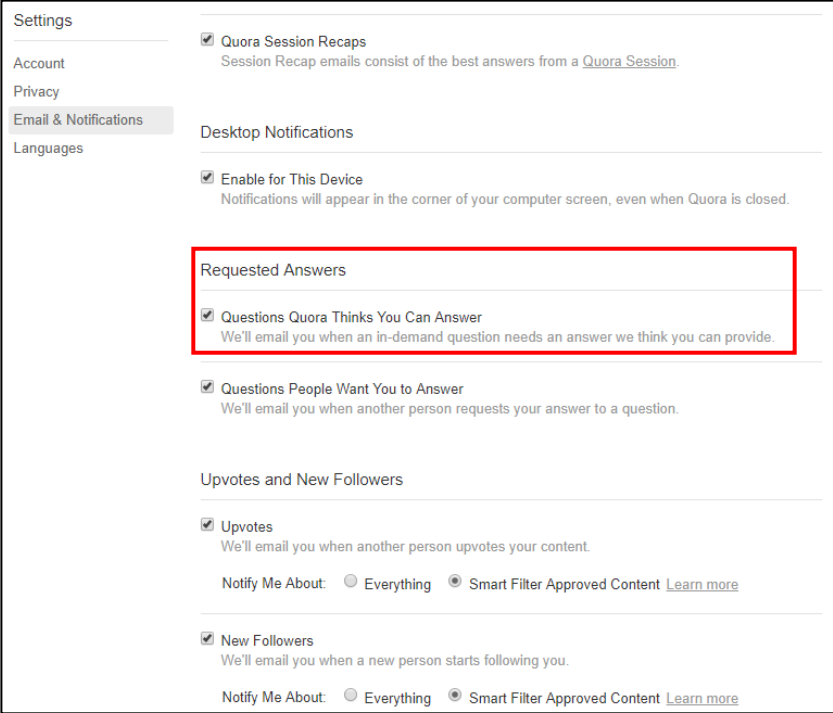


Claim 1	Accused Product or Service
<p>user, selecting one or more participants from the list to receive the electronic communication, wherein selecting is based at least in part on the selection of the category or the information associated with at least one of each participant or the one or more individuals that correspond to each participant;</p>	<p>category interests, etc.) with the participant or individual, Quora selects one or more participants to receive to receive the electronic communication containing inquiry of the user.</p> <div data-bbox="597 443 1432 600" style="border: 1px solid black; border-radius: 15px; padding: 10px; margin: 10px 0;"> <p>Each participant separately receives questions or inquiry of the user from Quora based on the selection of the category by the user as well as categories followed by the participant.</p> </div> <div data-bbox="609 636 1417 1306" style="border: 1px solid black; padding: 10px; margin: 10px 0;">  </div> <p><b>[Snapshot taken after creating a profile in Quora.com]</b></p> <div data-bbox="597 1478 1432 1640" style="border: 1px solid black; border-radius: 15px; padding: 10px; margin: 10px 0;"> <p>Besides, each participant also receives notifications (Blue icons which indicate new questions related to a specific category) based on participant’s category of interest.</p> </div>

Claim 1	Accused Product or Service
	 <p>The screenshot shows the Quora.com homepage. The top navigation bar includes the Quora logo, Home, Answer, Notifications, a search bar, and an Add Question button. The left sidebar contains a 'Feeds' section with options: Top Stories, Bookmarked Answers, Links (highlighted with a red box), Technology Startups, Science of Everyday Life, Digital Marketing, Social Media Marketing, Exams and Tests, and Current Events in Technology. The main content area features an answer to the question 'If each brand had an honest slogan, what would some be?' by Simran Kaur, MTS at VMware (2018-present). The answer lists: 1-Maggi 2 minutes silence for those who thought i'll be ready in 2 minutes. 2-Starbucks At the price of your whole month coffee. 3-iphone *new feature- ahh who cares , i make you look rich. ... (more). Below the answer are two questions: 'Can homeopathy cure stage 4 breast cancer?' and 'Why do people die after surgery of esophageal cancer?'. The right sidebar is titled 'Improve Your Feed' and lists several suggestions with checkmarks.</p>

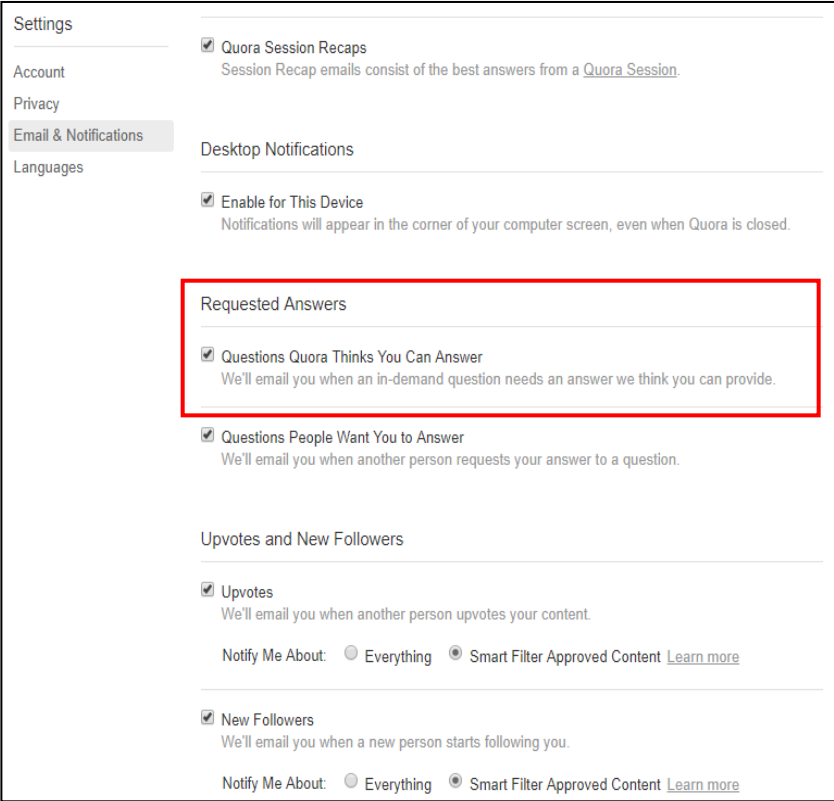
[Snapshot taken after creating a profile in Quora.com]


Claim 1	Accused Product or Service
	<div data-bbox="602 264 1422 1209"> <p>The screenshot displays a grid of Quora user profiles. Each profile includes a profile picture, the user's name, a brief bio, the number of answers they have provided, and a 'Follow' button with their follower count. The profiles are arranged in two columns and six rows.</p> <ul style="list-style-type: none"> <li><b>Tim Ventura:</b> 30 Answers, 1.2k Followers</li> <li><b>Madhukar:</b> Programmer   Outdoor Enthusiast   Thi..., 19 Answers, 244 Followers</li> <li><b>Francisco Fonseca:</b> "A useful servant but dangerous master...", 11 Answers, 367 Followers</li> <li><b>Pujitha P:</b> Marketing and Communications Manager, 14 Answers, 37 Followers</li> <li><b>Garima Nayyar:</b> Marketing Manager, 23 Answers, 170 Followers</li> <li><b>Armaan Agrawal:</b> Top Writer 2018. Tokyoite., 9 Answers, 270 Followers</li> <li><b>Ernest W. Adams:</b> Game Design Consultant, Author, and ..., 8 Answers, 72.8k Followers</li> <li><b>Smith Kelly:</b> Business lover, dubai, 11 Answers, 18 Followers</li> <li><b>Sagar Solanki:</b> CEO of My Home, 9 Answers, 251 Followers</li> <li><b>C.J. Windisch:</b> Engineer. Maker. Roboticist., 8 Answers, 339 Followers</li> <li><b>Michael Soareverix:</b> The Unnamed Hero, 6 Answers, 2.6k Followers</li> <li><b>Karen Kolkey:</b> 15, Entrepreneur, UC Berkeley student, 9 Answers, 1.9k Followers</li> </ul> </div> <p data-bbox="594 1293 1393 1373"><b>Attachment 3 (Current Events in Technology - Followers - Quora (Webpage, 2018)) at 1.</b></p> <div data-bbox="594 1444 1425 1583" style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p data-bbox="613 1465 1360 1541">One or more participants or individuals are selected to receive user's inquiry message.</p> </div>

Claim 1	Accused Product or Service
	 <p>The screenshot displays the 'Email &amp; Notifications' settings page on Quora. A red rectangular box highlights the 'Requested Answers' section, which includes the following options:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> <b>Quora Session Recaps</b> Session Recap emails consist of the best answers from a <a href="#">Quora Session</a>.</li><li><input checked="" type="checkbox"/> <b>Enable for This Device</b> Notifications will appear in the corner of your computer screen, even when Quora is closed.</li><li><b>Requested Answers</b><ul style="list-style-type: none"><li><input checked="" type="checkbox"/> <b>Questions Quora Thinks You Can Answer</b> We'll email you when an in-demand question needs an answer we think you can provide.</li><li><input checked="" type="checkbox"/> <b>Questions People Want You to Answer</b> We'll email you when another person requests your answer to a question.</li></ul></li></ul> <p>Below the highlighted section, the 'Upvotes and New Followers' section is visible, with the following options:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> <b>Upvotes</b> We'll email you when another person upvotes your content. Notify Me About: <input type="radio"/> Everything <input checked="" type="radio"/> Smart Filter Approved Content <a href="#">Learn more</a></li><li><input checked="" type="checkbox"/> <b>New Followers</b> We'll email you when a new person starts following you. Notify Me About: <input type="radio"/> Everything <input checked="" type="radio"/> Smart Filter Approved Content <a href="#">Learn more</a></li></ul>

**[Snapshot taken after creating a profile in Quora.com]**

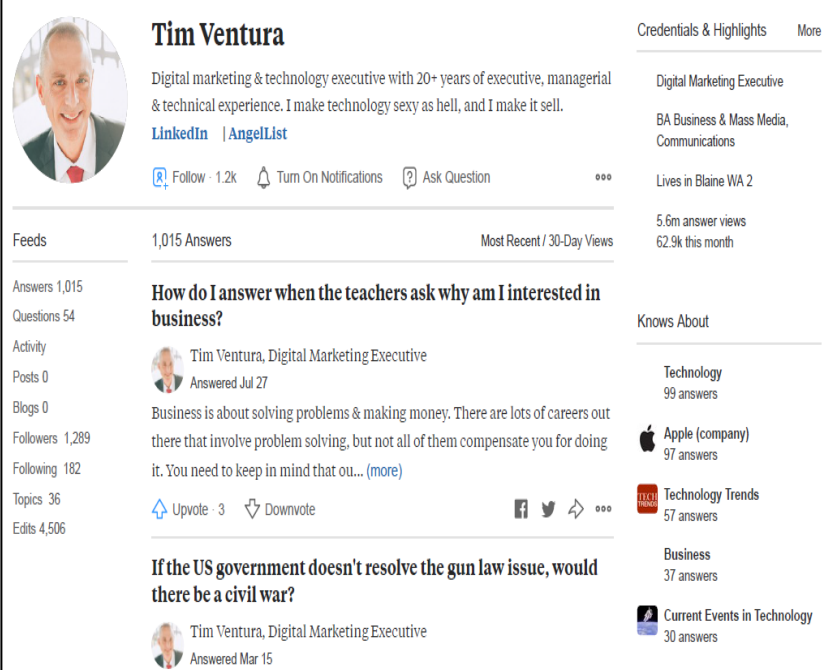
Claim 1	Accused Product or Service
<p>sending the inquiry to the selected one or more participants;</p>	<p>Plaintiff contends that in case of Quora, user’s inquiry is shared with one or more.</p> <div data-bbox="597 422 1430 583" style="border: 1px solid black; border-radius: 15px; padding: 10px; margin: 10px 0;"> <p>Each participant separately receives questions or inquiry of the user from Quora.</p> </div> <div data-bbox="597 726 1406 1463" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>The screenshot shows the Quora website interface. On the left, a sidebar menu is visible with a red box around the 'Links' section, which includes categories like Technology Startups, Science of Everyday Life, Digital Marketing, and Social Media Marketing. In the main content area, an answer by Simran Kaur is highlighted with a red box. Below it, a 'Questions for You' section is also highlighted with a red box, showing two questions: 'Can homeopathy cure stage 4 breast cancer?' and 'Why do people die after surgery of esophageal cancer?'. Red arrows point from the text above to these specific elements in the screenshot.</p> </div> <p><b>[Snapshot taken after creating a profile in Quora.com]</b></p>



Claim 1	Accused Product or Service
	 <p>The screenshot shows the 'Email &amp; Notifications' section of a Quora account settings page. A red box highlights the 'Requested Answers' section, which includes the following options:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> <b>Questions Quora Thinks You Can Answer</b> We'll email you when an in-demand question needs an answer we think you can provide.</li> <li><input checked="" type="checkbox"/> <b>Questions People Want You to Answer</b> We'll email you when another person requests your answer to a question.</li> </ul> <p>Other visible settings include 'Quora Session Recaps', 'Desktop Notifications', 'Upvotes and New Followers', and 'New Followers'.</p> <p><b>[Snapshot taken after creating a profile in Quora.com]</b></p>
<p>receiving a response to the inquiry from the selected one or more participants, the response from each of the one or more participants including biographical information about that participant;</p>	<p>Plaintiff contends that one or more participants can responds to the user’s inquiry. Each participant’s biographical information is also shared along with the response.</p>

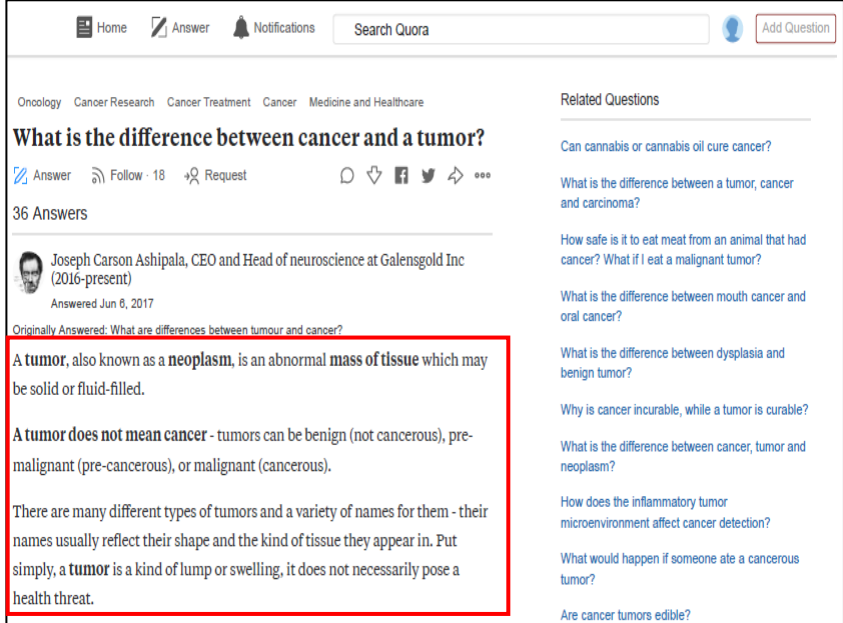
Claim 1	Accused Product or Service
<p data-bbox="204 457 456 520">User's inquiry</p> <p data-bbox="204 695 558 867">Participant with biographical information</p> <p data-bbox="204 1020 565 1157">Response from the participant</p>	<div data-bbox="602 275 1130 1451"> <p>Social Justice Warriors (SJWs) Men Survey Question</p> <p><b>What do you think about SJWs (social justice warriors)?</b></p> <p>Answer Follow 39 Request 4+ 4+ f t ↗ ⋮</p> <p>88 Answers</p> <p><b>Tim Ventura, Digital Marketing Executive</b> Answered Mar 11</p>  <p>SJWs are the BEST thing that could have happened...<i>for the Republican Party.</i> For decades now, the Republicans have been dealing with accusations of bigotry &amp; racism, and the traditional reactionary stance of conservatives to social progressives as always been difficult to justify.</p> <p>You've seen all the photos from the 60's - the nice, mellow hippie putting the flower in the barrel of the policeman's gun. It's tough representing law &amp; order when your enemies just fold in front of you &amp; cry. Makes you look like the bad guy.</p> <p>Social Justice Warriors, though- that's a true gift from above. First of all, the idea of fighting intolerance with violence is absolutely ridiculous. Violence IS intolerance. The "fire with fire" ideology is one of the reasons the middle east is falling apart: do we really need that here in America?</p> <p>But more importantly, from a political perspective it lets conservatives squarely turn the tables on progressives and demonstrate that whatever failings Republicans may have are shared equally with the left.</p> <p>7.9k Views - View Upvoters</p> <p>Upvote 386 Downvote f t ↗ ⋮</p> </div> <div data-bbox="1166 275 1425 1157"> <p>Related Questions</p> <p>If you're a conservative, have you ever felt silenced by liberal popular opinion or colleagues?</p> <p>How did the term "Social Justice Warriors" originate? How did it become such a negative and derogatory term? Do you personally use it? Why or ...</p> <p>What is your opinion on SJWs?</p> <p>Are SJWs ruining Hollywood and movies?</p> <p>Why are there so many people now openly hostile toward "Social Justice Warriors"?</p> <p>How far do you think the SJW will go to ruin Marvel?</p> <p>What was the dumbest thing a feminist or social justice warrior (SJW) ever said to you?</p> <p>Would you consider yourself to be an SJW (social justice warrior)?</p> <p>Do social justice warriors (SJWs) give liberalism a bad name?</p> <p>Which social justice class are you: warrior, wizard, mage, rogue, barbarian, cleric, paladin, monk, etc.?</p> <p>+ Ask New Question</p> <p>More Related Questions</p> <p>Question Stats</p> <p>38 Public Followers 121,842 Views Last Asked Aug 2 5 Merged Questions Edits</p> </div>

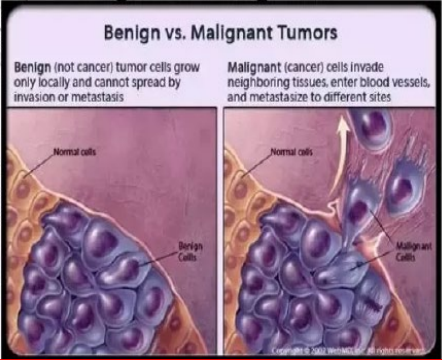
Claim 1	Accused Product or Service
<p data-bbox="235 646 430 800">Another participant with biographical information</p> <p data-bbox="224 961 406 1031">Response from the participant</p> <p data-bbox="240 1251 475 1402">Refer Attachment 5 for responses provided by one or more participants</p>	<div data-bbox="613 264 1414 491"> <p data-bbox="654 296 695 342"></p> <p data-bbox="712 300 857 323">Add a comment...</p> <p data-bbox="1235 302 1382 323">Recommended All</p> <hr/> <div data-bbox="630 415 686 474"></div> <p data-bbox="691 415 1130 441">Jensen Rodriguez, studied Finance &amp; Economics</p> <p data-bbox="691 447 808 470">Updated May 3</p> </div> <p data-bbox="610 522 1419 575">As a Hispanic and fourth generation U.S. citizen, (my family is from Puerto Rico) I feel identified with some of the attacks that SJWs makes.</p> <div data-bbox="613 598 1406 972"> </div> <p data-bbox="610 989 1398 1041">They just don't accept that a Hispanic person can have conservative views (not extreme views in anyways, I am mostly in the center of the panel).</p> <p data-bbox="610 1062 1211 1087">They also think that they have all the answers to everything.</p> <p data-bbox="610 1108 1419 1220">It is almost as if they wanted to discharge their unhappiness on everyone else just because they can't accept that other people are living a happy and sound life while they are distressed by having their subjective senses of how the world should be threatened all the time.</p> <p data-bbox="610 1241 1414 1325">First of all, I am in no ways against immigration, I have friends of all race, I am Hispanic which imply that I am of mixed races, I believe in fair, equal rights and treatment towards women, I am also a Christian.</p> <p data-bbox="610 1346 1419 1486">What I don't believe is in deliberately breaking the law, creating fake news and sensationalist claims, obstructing the first and the second amendment (Free speech and guns), and their idea that you should accuse anybody of anything and be entitled to other people blindly believing your accusation and destroying the accused lives long before a court trail even begin.</p> <p data-bbox="610 1507 1414 1591">I really don't understand what their true intentions are, but what I'm sure is that extremes are extremely bad on both sides of the spectrum and it might end pretty badly.</p> <p data-bbox="610 1612 1354 1665">SJW will only achieve that all of their sacrifice for so-called "social justice" backfires back on them.</p> <p data-bbox="610 1682 824 1703">5.7k Views - View Upvoters</p>




Claim 1	Accused Product or Service
	<p data-bbox="597 264 1422 342"><b>Attachment 5 (What do you think about SJWs (social justice warriors)? - Quora (Webpage, 2018)) at 1 and 2.</b></p> <div data-bbox="602 348 1380 441" style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 10px 0;"> <p data-bbox="625 365 1117 396">Participant with biographical information</p> </div> <div data-bbox="597 478 1433 1157" style="border: 1px solid black; padding: 10px; margin: 10px 0;">  <p>The screenshot shows the Quora profile of Tim Ventura, a Digital Marketing Executive. The profile includes a bio, social media links (LinkedIn, AngelList), and a list of topics he is interested in, such as Technology, Apple (company), and Business. It also shows two of his answers: one about being interested in business and another about the potential for a civil war in the US.</p> </div> <p data-bbox="597 1241 1409 1276"><b>Attachment 4 (Tim Ventura - Quora (Webpage, 2018)) at 1.</b></p>


Claim 1	Accused Product or Service
<p>publishing at least a portion of the response from each of the selected one or more participants for other users to view, wherein publishing is performed without identifying the user but includes providing biographical information about the participant who provided the response;</p>	<p>Plaintiff contends that a portion of response from each participant is published for other users to view. In Quora, user can anonymously post his inquiry (by selecting option “<b>Add Anonymously</b>”) in which case user’s identity remains hidden. However, the biographical information of one or more participants who provided the responses can be viewed.</p> <div data-bbox="623 554 1403 667" style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 10px 0;"> <p>User can anonymously share his inquiry in which case user’s identity remains hidden</p> </div> <div data-bbox="599 779 1433 1801" style="border: 1px solid black; padding: 10px;"> <div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 10px;"> <p><b>You are asking your first question!</b></p> <p>How to quickly get a good answer:</p> <ul style="list-style-type: none"> <li>Keep your question short and to the point</li> <li>Check for grammar or spelling errors</li> <li>Phrase it like a question</li> <li>Make sure it hasn't been asked before</li> </ul> </div> <div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 10px;"> <p> Anonymous asks</p> </div> <p><b>What is the difference between cancer and tumor?</b></p> <hr/> <p>What is the difference between cancer and tumor? 0 Answers</p> <hr/> <p>What is the difference between a tumor, cancer and carcinoma? 12 Answers</p> <hr/> <p>What is the difference between having cancerous cells and cancerous tumors? 1 Answer</p> <hr/> <p>What is the difference between piles and cancer tumors? 4 Answers</p> <hr/> <p>What is the difference between cancer, tumor and neoplasm? 3 Answers</p> <hr/> <p>How does a cancerous and non-cancerous tumor differ? 3 Answers</p> <hr/> <p> Optional: include a link that gives context</p> <div style="display: flex; justify-content: flex-end; align-items: center; gap: 10px;"> <span>Cancel</span> <div style="border: 1px solid red; padding: 2px;"> <input checked="" type="checkbox"/> Add Anonymously         </div> <span>Add Question</span> </div> </div>

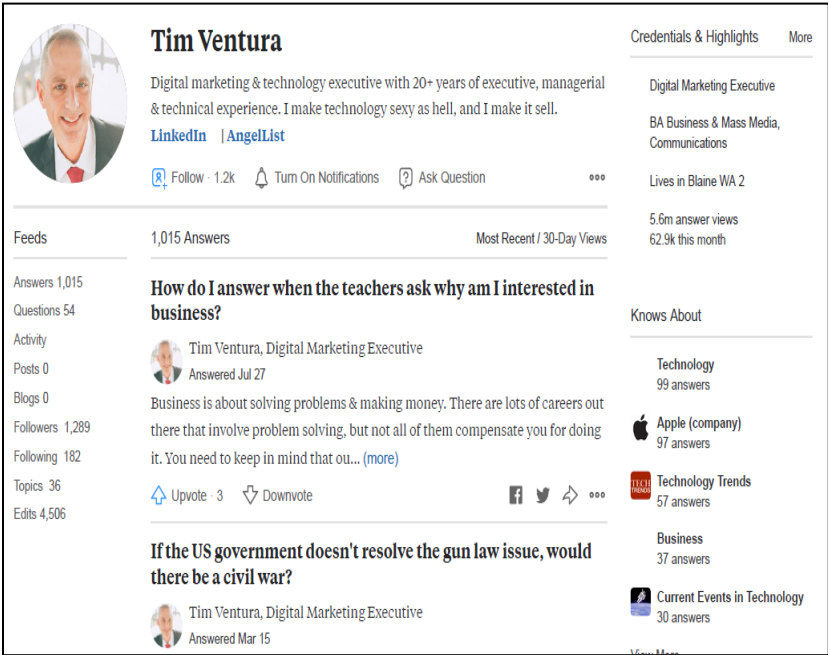
Claim 1	Accused Product or Service
	<p data-bbox="597 264 1406 300"><b>[Snapshot taken after creating a user profile in Quora.com]</b></p> <div data-bbox="597 380 1435 999">  </div> <p data-bbox="597 1031 646 1052">***</p> <div data-bbox="621 1131 1297 1304" style="border: 1px solid black; border-radius: 15px; padding: 10px; text-align: center;"> <p data-bbox="646 1157 1273 1268">Publishing at least a portion of the response from each of the one or more participants for other users to view</p> </div>

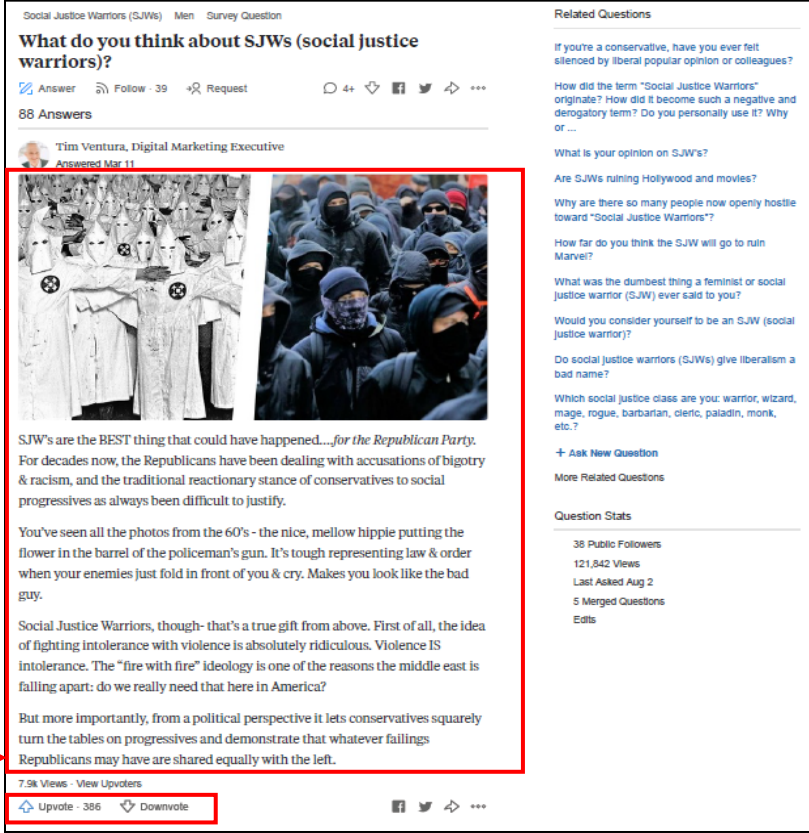

Claim 1	Accused Product or Service
	<div data-bbox="602 264 1136 705"><p><b>Benign vs. Malignant</b></p><p><b>Benign vs. Malignant Tumors</b></p><p><b>Benign (not cancer) tumor cells grow only locally and cannot spread by invasion or metastasis</b></p><p><b>Malignant (cancer) cells invade neighboring tissues, enter blood vessels, and metastasize to different sites</b></p><p>Normal cells</p><p>Benign Cells</p><p>Malignant Cells</p></div> <div data-bbox="609 730 943 758"><p>Source: Tumors: Benign, Premalignant and Malignant</p></div> <div data-bbox="609 766 742 787"><p>1.5k Views · View Upvoters</p></div> <div data-bbox="623 844 1089 877"><p><input type="text" value="Add a comment..."/> Recommended All</p></div> <div data-bbox="609 1033 1101 1056"><p>Upvote · 4 Downvote <span>Facebook Twitter Share</span></p></div>

**Attachment 6 (What is the difference between cancer and a tumor? - Quora (Webpage, 2018)) at 1.**

Claim 1	Accused Product or Service
	<div data-bbox="609 275 1104 352">  <p>Walter Olson, Intellectual, Professor Emeritus, Engineer, Soldier and Cancer Knowledgeable Updated Feb 20, 2015</p> </div> <div data-bbox="609 363 1144 1390" style="border: 2px solid red; padding: 5px;"> <p>This is a good question because the terms are used interchangeably when they should not be.</p> <p>Tumors may or may not be cancers. Cancers may represent as tumors.</p> <p>A tumor is an abnormal growth or mass of tissue in an organism. If the tumor stabilizes such that it does not effect bodily functions, it is normally classified as benign. If it does effect bodily functions, it is considered malignant. It may be considered cancerous if it meets the definition of a cancer. A cyst is often considered benign whereas a melanoma growth is considered malignant and cancerous.</p> <p>A cancer is a uncontrolled genetic mutation of normal cells that if left unchecked will threaten the life and well being of the organism that it is in. From the definitions of the National Cancer Institute, all cancers are tumors. An example of tumorous cancer is breast cancer.</p> <p>EDIT: This was revised because of Tristan Chenier's comment below which reflected that my reference was incorrect.</p> <p>There may be a dispute whether or not leukemia is a tumor. It seems most sources consider it a tumor or are non-specific. However the National Cancer Institute declares it not a tumor which was consistent with my original answer:</p> <p>"Not all tumors are cancerous; tumors can be benign or malignant.</p> <ul style="list-style-type: none"> <li>• <b>Benign tumors</b> aren't cancerous. They can often be removed, and, in most cases, they do not come back. Cells in benign tumors do not spread to other parts of the body.</li> </ul> </div> <p data-bbox="597 1417 646 1438">***</p> <div data-bbox="602 1570 1425 1709" style="border: 1px solid black; border-radius: 15px; padding: 10px; margin-top: 20px;"> <p>Publishing at least a portion of the response from each of the one or more participants for other users to view</p> </div>

Claim 1	Accused Product or Service
<p>Publishing at least a portion of the response from each of the one or more participants for other users to view</p>	<div data-bbox="602 264 1425 625"> <ul style="list-style-type: none"> <li>• <b>Malignant tumors</b> are cancerous. Cells in these tumors can invade nearby tissues and spread to other parts of the body. The spread of cancer from one part of the body to another is called metastasis.</li> </ul> <p>Some cancers do not form tumors. For example, leukemia is a cancer of the bone marrow and blood."  <a href="http://www.cancer.gov/cancertopi...">http://www.cancer.gov/cancertopi...</a></p> <p>3.8k Views · View Upvoters</p> <p>Upvote · 13   Downvote</p> <p>Add a comment...</p> </div> <p><b>Id. at 2.</b></p> <div data-bbox="602 709 1425 1690"> <p>Social Justice Warriors (SJWs) Men Survey Question</p> <h3>What do you think about SJWs (social justice warriors)?</h3> <p>Answer Follow · 39 Request</p> <p>88 Answers</p> <p>Tim Ventura, Digital Marketing Executive          Answered Mar 11</p>  <p>SJWs are the BEST thing that could have happened...<i>for the Republican Party.</i> For decades now, the Republicans have been dealing with accusations of bigotry &amp; racism, and the traditional reactionary stance of conservatives to social progressives as always been difficult to justify.</p> <p>You've seen all the photos from the 60's - the nice, mellow hippie putting the flower in the barrel of the policeman's gun. It's tough representing law &amp; order when your enemies just fold in front of you &amp; cry. Makes you look like the bad guy.</p> <p>Social Justice Warriors, though- that's a true gift from above. First of all, the idea of fighting intolerance with violence is absolutely ridiculous. Violence IS intolerance. The "fire with fire" ideology is one of the reasons the middle east is falling apart: do we really need that here in America?</p> <p>But more importantly, from a political perspective it lets conservatives squarely turn the tables on progressives and demonstrate that whatever failings Republicans may have are shared equally with the left.</p> <p>7.9k Views · View Upvoters</p> <p>Upvote · 386   Downvote</p> </div> <p><b>Attachment 5 (What do you think about SJWs (social justice warriors)? - Quora (Webpage, 2018)) at 1.</b></p>

Claim 1	Accused Product or Service
	<div data-bbox="609 264 1365 331" style="border: 1px solid black; border-radius: 10px; padding: 5px; margin-bottom: 10px;"> <p>Participant with biographical information</p> </div> <div data-bbox="602 436 1425 1087" style="border: 1px solid black; padding: 10px;">  </div> <p data-bbox="597 1171 1409 1205" style="text-align: center;"><b>Attachment 4 (Tim Ventura - Quora (Webpage, 2018)) at 1.</b></p>
<p>tracking feedback for each of the selected one or more participants based at least in part on the published portion of the response, including determining a rating from the user for at least one of the selected one or more participants.</p>	<p>Plaintiff contends that feedback for each participant is tracked based on his or her provided response. The user can provide rating to the participant(s) based on the response(s) by selecting “Upvote” or “Downvote”. Besides, user can also provide detailed feedback by commenting on the response(s) of the participant(s) as well as can send “Thank” to the participant.</p>

Claim 1	Accused Product or Service
<p data-bbox="196 604 553 888">User can provide feedback to the participant based on his or her response by selecting “Upvote” or “Downvote”</p>	<div data-bbox="610 264 1414 1092">  <p data-bbox="625 289 1024 331"><b>What do you think about SJWs (social justice warriors)?</b></p> <p data-bbox="625 342 857 363">88 Answers</p> <p data-bbox="625 401 891 432">Tim Ventura, Digital Marketing Executive Answered Mar 11</p> <p data-bbox="625 436 1092 682"><i>SJW's are the BEST thing that could have happened...for the Republican Party. For decades now, the Republicans have been dealing with accusations of bigotry &amp; racism, and the traditional reactionary stance of conservatives to social progressives as always been difficult to justify.</i></p> <p data-bbox="625 688 1092 863"><i>You've seen all the photos from the 60's - the nice, mellow hippie putting the flower in the barrel of the policeman's gun. It's tough representing law &amp; order when your enemies just fold in front of you &amp; cry. Makes you look like the bad guy.</i></p> <p data-bbox="625 877 1092 953"><i>Social Justice Warriors, though- that's a true gift from above. First of all, the idea of fighting intolerance with violence is absolutely ridiculous. Violence IS intolerance. The "fire with fire" ideology is one of the reasons the middle east is falling apart: do we really need that here in America?</i></p> <p data-bbox="625 968 1092 1026"><i>But more importantly, from a political perspective it lets conservatives squarely turn the tables on progressives and demonstrate that whatever failings Republicans may have are shared equally with the left.</i></p> <p data-bbox="625 1041 748 1052">7.9k Views · View Upvoters</p> <p data-bbox="625 1058 821 1079">Upvote · 386 Downvote</p> </div> <p data-bbox="597 1119 1422 1192"><b>Attachment 5 (What do you think about SJWs (social justice warriors)? - Quora (Webpage, 2018)) at 1.</b></p> <div data-bbox="610 1220 1414 1545">  <p data-bbox="625 1220 1385 1314"><i>But more importantly, from a political perspective it lets conservatives squarely turn the tables on progressives and demonstrate that whatever failings Republicans may have are shared equally with the left.</i></p> <p data-bbox="625 1335 821 1356">7.9k Views · View Upvoters</p> <p data-bbox="625 1371 899 1402">Upvote · 386 Downvote</p> <p data-bbox="695 1444 841 1465">Add a comment...</p> <p data-bbox="1182 1402 1398 1545">Bookmark Suggest Edits Thank Report</p> </div> <p data-bbox="597 1577 1398 1650"><b>[Snapshot taken after creating a user profile in Quora.com (that is, for Attachment 5)]</b></p> <p data-bbox="597 1675 1433 1875">User can provide rating to the participant based on the participant’s response by selecting “Upvote” or “Downvote”. Besides, user can also provide detailed feedback by commenting on the provided response as well as can send “Thank” to the participant.</p>



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

11. Quora has and continues to induce infringement. Quora has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer Website on the Internet where questions are asked, answered, edited, and organized by its community of users in the form of opinions) and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–8 of the '591 patent, literally or under the doctrine of equivalents. Moreover, Quora has known of the '591 patent and the technology underlying it from at least the date of issuance of the patent.

12. Quora has and continues to contributorily infringe. Quora has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., question and answer Website on the Internet where questions are asked, answered, edited, and organized by its community of users in the form of opinions) and related services that provide question and answer services across the Internet such as to cause infringement of claims 1–8 of the '591 patent, literally or under the doctrine of equivalents. Moreover, Quora has known of the '591 patent and the technology underlying it from at least the date of issuance of the patent.

13. Quora has caused and will continue to cause NETSOC damage by direct and indirect infringement of (including inducing infringement of) the claims of the '591 patent.

### **III. JURY DEMAND**

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

### **IV. PRAYER FOR RELIEF**

WHEREFORE, NETSOC prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '591 patent through quoras.com;
- b. award NETSOC damages in an amount sufficient to compensate it for Defendant's infringement of the '591 patent, in an amount no less than a reasonable royalty or lost profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;
- c. award 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;
- d. 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;
- e. declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;
- f. a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and
- g. award NETSOC such other and further relief as this Court deems just and proper.

Respectfully submitted,

**Ramey & Schwaller, LLP**

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*Attorneys for NetSoc, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of July 9, 2019, with a copy of the foregoing via the Court's CM/ECF.