

**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>Civil Action No. 1:18-cv-12267</b>
	)	<b>(CONSOLIDATED CASE)</b>
	)	
<b>YAHOO! INC.</b>	)	<b>JURY TRIAL DEMANDED</b>
<b>Defendant.</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 Oath Inc.<sup>1</sup>, 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, Oath Inc. (“Oath”) is a foreign corporation organized and existing under the laws of Delaware, with a principal place of business located at 770 Broadway, New York, New York 10003-9562. Counsel for Oath Inc., Kevin P. Anderson, Duane Morris, LLP

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<sup>1</sup> The business units of Yahoo, Inc. that are the subject of this Complaint were sold to Verizon and now known as Oath Inc.

505 9<sup>th</sup> Street, N.W., Suite 1000, Washington, DC 20004-2166 accepted service. On information and belief, Oath 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.

## 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 principal, physical place of business at 229 West 43rd Street, New York, New York 10036. 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 Texas 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.

**III. 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.

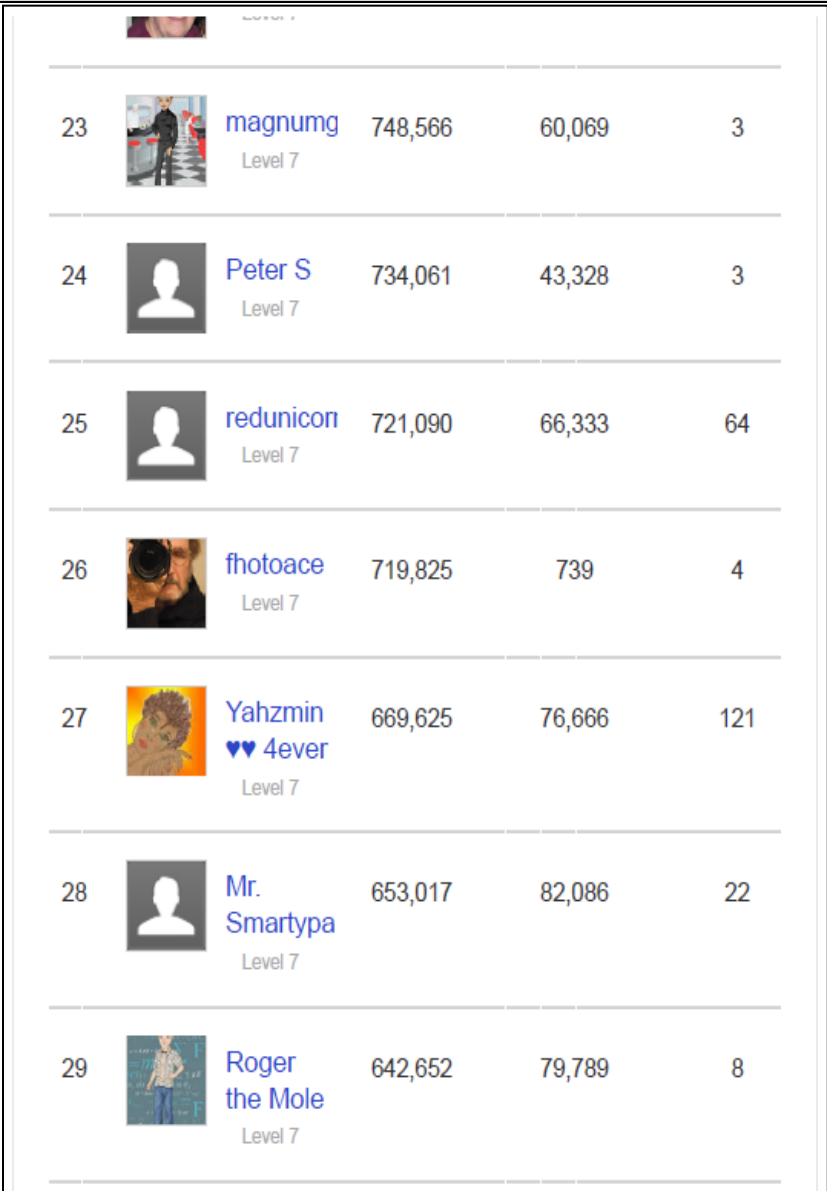





















9. Oath maintains, operates, and administers a website at www.oath.com that infringes one or more claims of the ‘591 patent, including at least claims 1-8, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘591 Patent into service (i.e., used them); but for Defendant’s 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 Oath Answers Service offers a method of social network.

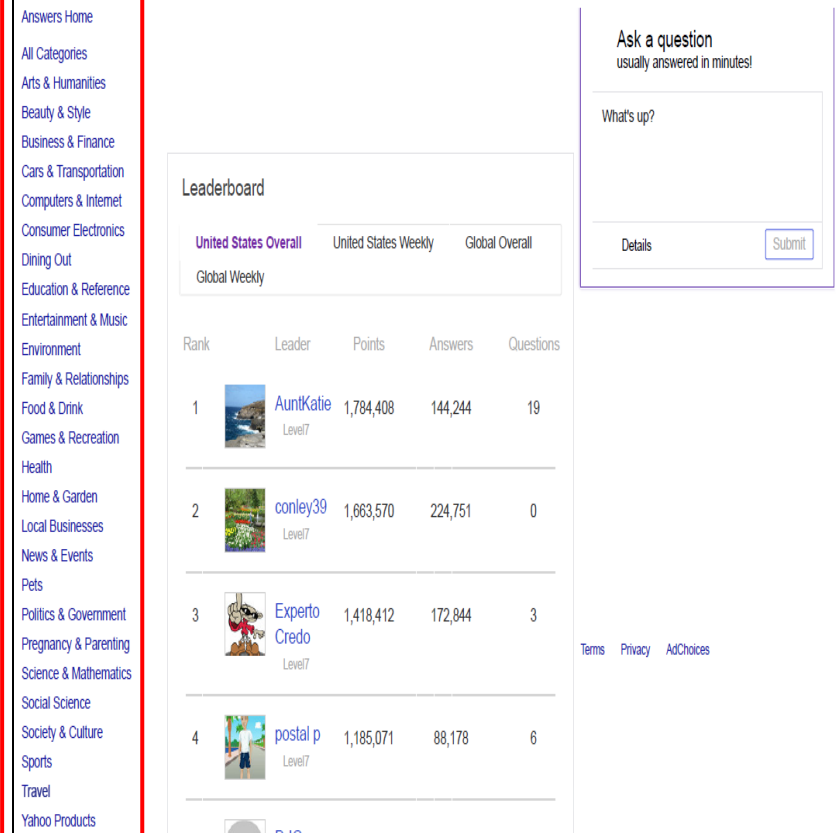
Claim 1	Accused Product or Service
	<p style="text-align: center;"><b>Knowledge Sharing in the Online Social Network of Yahoo! Answers and Its Implications</b></p> <p style="text-align: center;">Haiying Shen*, Senior Member, IEEE, Ze Li, Jinwei Liu, Joseph Edward Grant</p> <p><small>Abstract—Question and Answer (Q&amp;A) websites such as Yahoo! Answers provide a platform where users can post questions and receive answers. These systems take advantage of the collective intelligence of users to find information. In this paper, we analyze the online social network (OSN) in Yahoo! Answers. Based on a large amount of our collected data, we studied the</small></p> <p><b>Attachment 1 (Knowledge Sharing in the Online Social Network of Oath Answers and Its Implications (2014)) at 1.</b></p>
<p>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>Plaintiff contends that with the help of data-centers or servers, Oath maintains data of plurality of participants or individuals along with their information.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><b>Yahoo! kicks off US\$500m data center consolidation</b></p> </div> <p><a href="http://www.yahoo.com">Yahoo!</a> (<a href="http://www.yahoo.com">URL=http://www.yahoo.com</a>) is revamping its entire data center infrastructure. The company is investing more than \$500m in new data center construction on three continents, its VP of operations Scott Noteboom announced at the <a href="#">DatacenterDynamics New York 2011 conference</a> (<a href="http://www.datacenterdynamics.com/conferences/2011/new-york">URL=http://www.datacenterdynamics.com/conferences/2011/new-york</a>) on Thursday, 10 March.</p> <p>Many of the new data centers will be built to the next generation of Yahoo!'s data center design called <b>Flex Tier Data Center</b>. The multi-tier design promises to reduce construction time to five months per phase, lower cost to \$3m-\$5m per 1MW and provide higher uptime for critical applications.</p> <p><b>Attachment 3 (Oath kicks off US\$500m data center consolidation   News   DatacenterDynamics (Webpage, 2011)) at 1 and 2.</b></p> <div style="border: 1px solid black; border-radius: 15px; padding: 10px; margin: 10px 0;"> <p>Yahoo stores and maintains a list of its participants or customers along with their associated information.</p> </div>

Claim 1	Accused Product or Service																																			
	<p data-bbox="639 302 805 331"><b>Leaderboard</b></p> <div data-bbox="639 365 1390 464"><p data-bbox="667 380 878 405"><b>United States Overall</b></p><p data-bbox="938 380 1138 405">United States Weekly</p><p data-bbox="1198 380 1333 405">Global Overall</p><p data-bbox="667 426 805 451">Global Weekly</p></div> <table border="1" data-bbox="639 512 1390 1423"><thead><tr><th data-bbox="639 512 699 537">Rank</th><th data-bbox="821 512 894 537">Leader</th><th data-bbox="976 512 1049 537">Points</th><th data-bbox="1130 512 1219 537">Answers</th><th data-bbox="1284 512 1390 537">Questions</th></tr></thead><tbody><tr><td data-bbox="659 600 675 625">1</td><td data-bbox="724 583 935 667"> <b>AuntKatie</b> Level7</td><td data-bbox="959 600 1065 625">1,784,408</td><td data-bbox="1130 600 1219 625">144,244</td><td data-bbox="1317 600 1349 625">19</td></tr><tr><td data-bbox="659 741 675 766">2</td><td data-bbox="724 724 935 808"> <b>conley39</b> Level7</td><td data-bbox="959 741 1065 766">1,663,570</td><td data-bbox="1130 741 1219 766">224,751</td><td data-bbox="1317 741 1333 766">0</td></tr><tr><td data-bbox="659 882 675 907">3</td><td data-bbox="724 865 935 970"> <b>Experto Credo</b> Level7</td><td data-bbox="959 882 1065 907">1,418,412</td><td data-bbox="1130 882 1219 907">172,844</td><td data-bbox="1317 882 1333 907">3</td></tr><tr><td data-bbox="659 1050 675 1075">4</td><td data-bbox="724 1033 935 1117"> <b>postal p</b> Level7</td><td data-bbox="959 1050 1065 1075">1,185,071</td><td data-bbox="1130 1050 1219 1075">88,178</td><td data-bbox="1317 1050 1333 1075">6</td></tr><tr><td data-bbox="659 1190 675 1215">5</td><td data-bbox="724 1173 935 1257"> <b>DrIG</b> Level7</td><td data-bbox="959 1190 1065 1215">1,153,871</td><td data-bbox="1130 1190 1219 1215">101,496</td><td data-bbox="1317 1190 1333 1215">5</td></tr><tr><td data-bbox="659 1331 675 1356">6</td><td data-bbox="724 1314 935 1398"> <b>nas88car</b> Level7</td><td data-bbox="959 1331 1065 1356">1,083,434</td><td data-bbox="1130 1331 1219 1356">101,251</td><td data-bbox="1308 1331 1357 1356">464</td></tr></tbody></table>	Rank	Leader	Points	Answers	Questions	1	 <b>AuntKatie</b> Level7	1,784,408	144,244	19	2	 <b>conley39</b> Level7	1,663,570	224,751	0	3	 <b>Experto Credo</b> Level7	1,418,412	172,844	3	4	 <b>postal p</b> Level7	1,185,071	88,178	6	5	 <b>DrIG</b> Level7	1,153,871	101,496	5	6	 <b>nas88car</b> Level7	1,083,434	101,251	464
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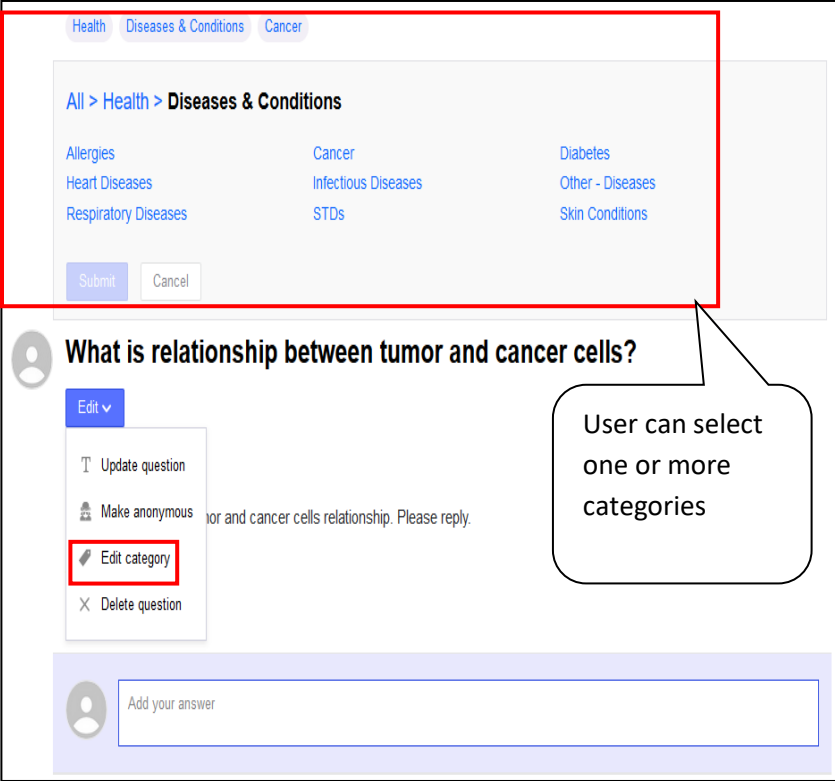
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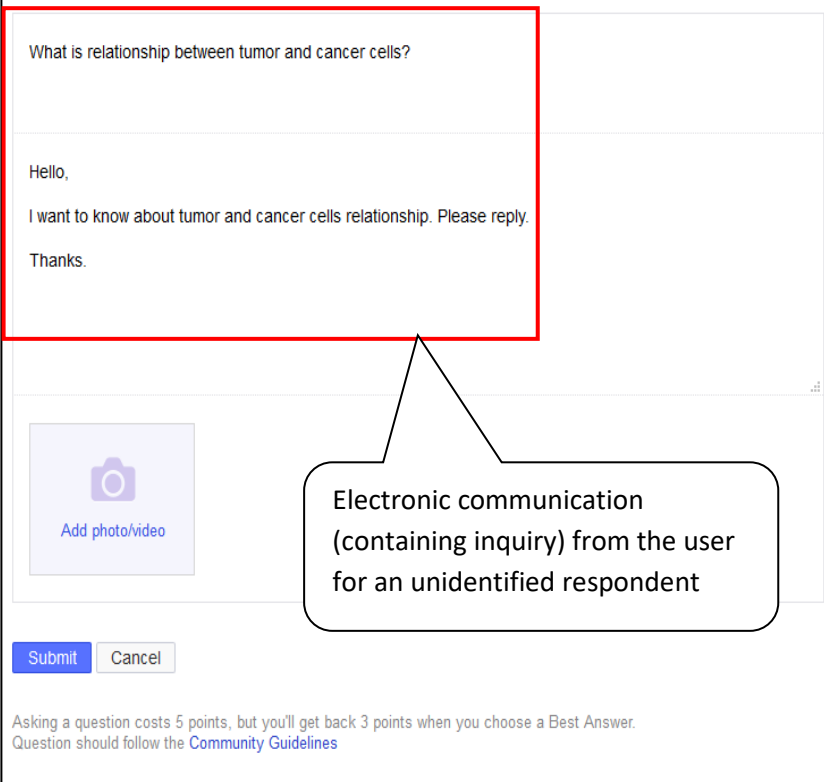
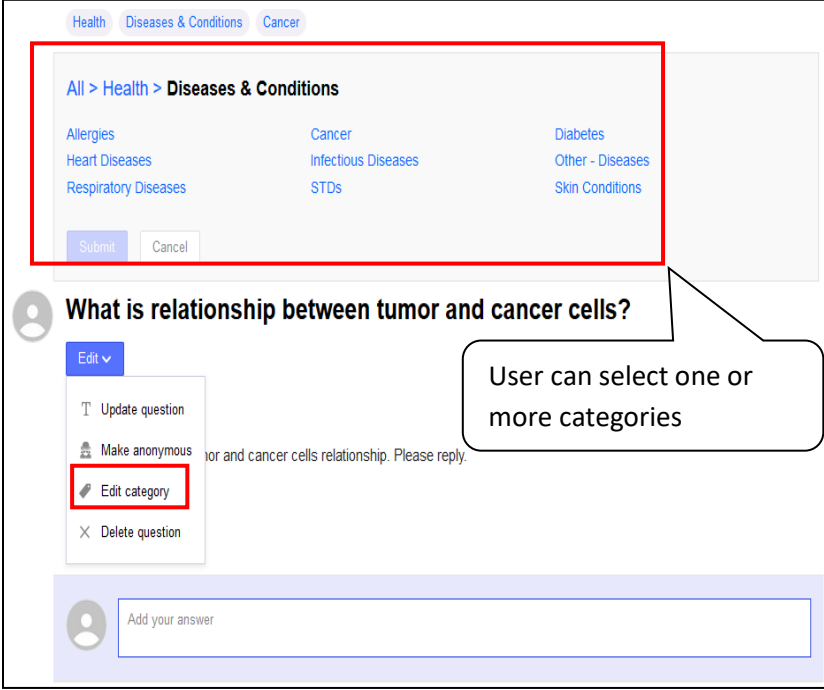
**Attachment 2 (Leaderboard | Oath Answers (Webpage, 2018)) at 1 and 2.**

Claim 1	Accused Product or Service
	<p data-bbox="602 275 1417 380">Information associated with each participant or individual is stored or maintained.</p> <div data-bbox="602 495 1438 1352" style="border: 1px solid black; padding: 10px;">  <p><b>Naguru</b> Level 7</p> <p>806,384 Points   28% Best Answers   143,576 Answers   14 Questions</p> <p><b>About Naguru:</b> I am 70 (in 2012) retired from Indian Central Government Service. We have a family background in Vedic knowledge, philosophy, mental health, social service, psychology, religion, yoga, music, Bhajan, etc. Such things are running in our blood and nerves. Following my family tradition, I also keep updating myself and trying to make use of my knowledge, time, influence, energy and resources for higher pursuits. I want to invest in lot of good-will. And my motto is 'Be Good and Do Good'. I am General Secretary of our Colony Senior Citizens Daycare &amp; Welfare Association.</p> <p>Mind and its peculiarities are my favorite subjects.</p> <p>My oft repeated quote is "Bring maximum happiness to maximum number of people for maximum time". <a href="#">show less</a></p> <p><b>Questions</b>   <b>Answers</b>   <b>More</b></p> <p><a href="#">Can knowledge be transferred or transmitted - OR - Knowledge comes out of learning and practice alone?</a> R &amp; S, Philosophy Section people may be able to throw some light. 30 answers · <a href="#">Indonesia</a> · 5 years ago</p> <p><a href="#">Why I am getting such notice?</a> Sorry, we couldn't find who you were looking for This person may not exist, there may be a problem with the link or <b>**gulp**</b> their account has been suspended. 14 answers · <a href="#">Do It Yourself (DIY)</a> · 7 years ago</p> </div> <p data-bbox="602 1381 1401 1457"><b>Attachment 4 (Questions   Oath Answers (Webpage, 2018)) at 1.</b></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>Plaintiff contends that user (or asker) is presented with plurality of categories from which the user can select one or more categories.</p>

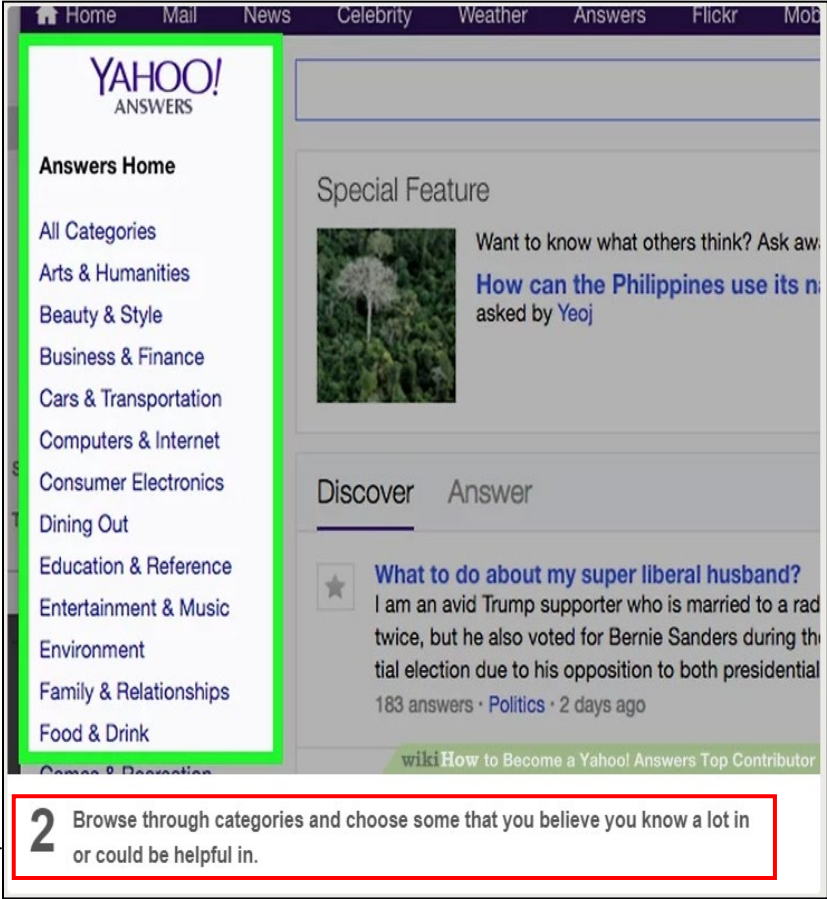
Claim 1	Accused Product or Service
	 <p><b>Attachment 2 (Leaderboard   Oath Answers (Webpage, 2018)) at 1.</b></p> <p>User can select one or more categories</p> <p><b>Ask clearly.</b> Keep your question clear and descriptive, and check your spelling and grammar. It helps people understand your questions, and you'll also get better answers. <a href="#">Read more</a></p> <p><b>Categorize correctly.</b> Categorize your question in the appropriate category. You will receive better and more relevant answers. <a href="#">Read more</a></p> <p><b>Attachment 5 (Community Guidelines   Oath Answers (Webpage, 2018)) at 1.</b></p>

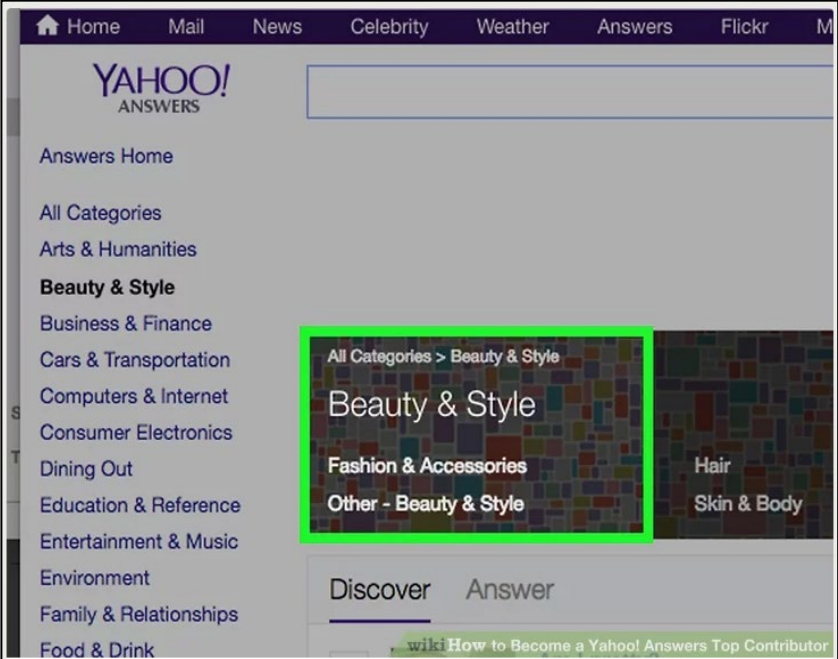
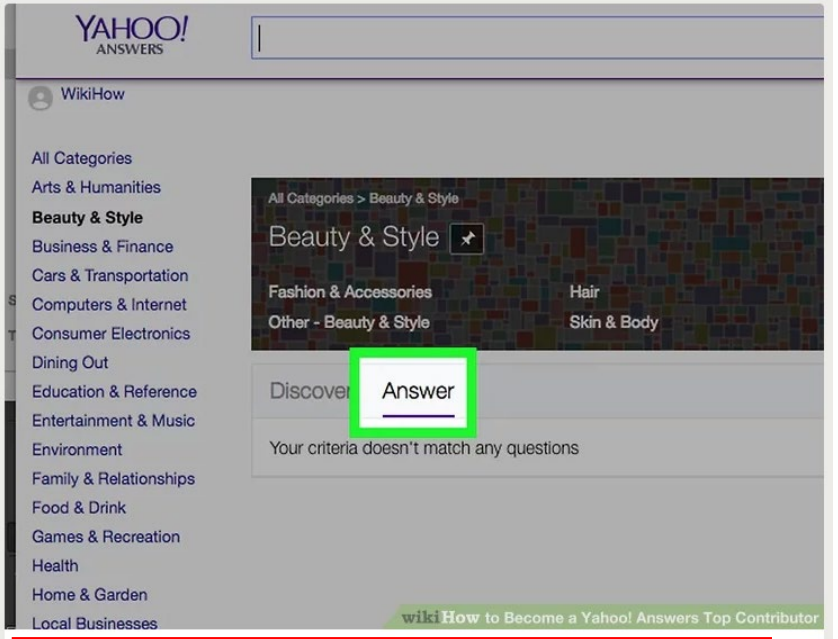





























Claim 1	Accused Product or Service
	 <p>The screenshot shows a breadcrumb trail: Health &gt; Diseases &amp; Conditions &gt; Cancer. Below this, there are several category options: Allergies, Cancer, Diabetes, Heart Diseases, Infectious Diseases, Other - Diseases, Respiratory Diseases, STDs, and Skin Conditions. A 'Submit' button is visible. Below the categories, a question is posted: 'What is relationship between tumor and cancer cells?'. An 'Edit' dropdown menu is open, showing options: 'Update question', 'Make anonymous', 'Edit category' (highlighted with a red box), and 'Delete question'. A callout bubble points to the 'Edit category' option with the text: 'User can select one or more categories'. At the bottom, there is a text input field labeled 'Add your answer'.</p> <p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>
<p>receiving the selection of the category by the user; 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 Oath Answers. Also, the respondents or answerers remain unidentified.</p> <p>User can type his inquiry as well as can also specify relevant category with respect to his inquiry by selecting at least one category.</p>

Claim 1	Accused Product or Service									
	 <p>What is relationship between tumor and cancer cells?</p> <p>Hello,</p> <p>I want to know about tumor and cancer cells relationship. Please reply.</p> <p>Thanks.</p> <p>Add photo/video</p> <p>Submit Cancel</p> <p>Asking a question costs 5 points, but you'll get back 3 points when you choose a Best Answer. Question should follow the <a href="#">Community Guidelines</a></p> <p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>  <p>Health Diseases &amp; Conditions Cancer</p> <p>All &gt; Health &gt; Diseases &amp; Conditions</p> <table border="0"><tr><td>Allergies</td><td>Cancer</td><td>Diabetes</td></tr><tr><td>Heart Diseases</td><td>Infectious Diseases</td><td>Other - Diseases</td></tr><tr><td>Respiratory Diseases</td><td>STDs</td><td>Skin Conditions</td></tr></table> <p>Submit Cancel</p> <p>What is relationship between tumor and cancer cells?</p> <p>Edit</p> <ul style="list-style-type: none"><li>Update question</li><li>Make anonymous</li><li><b>Edit category</b></li><li>Delete question</li></ul> <p>Add your answer</p> <p>Electronic communication (containing inquiry) from the user for an unidentified respondent</p> <p>User can select one or more categories</p>	Allergies	Cancer	Diabetes	Heart Diseases	Infectious Diseases	Other - Diseases	Respiratory Diseases	STDs	Skin Conditions
Allergies	Cancer	Diabetes								
Heart Diseases	Infectious Diseases	Other - Diseases								
Respiratory Diseases	STDs	Skin Conditions								

Claim 1	Accused Product or Service
	<p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>  <p>The screenshot shows a user profile page on Oath Answers. At the top, there are three category tabs: "Health", "Diseases &amp; Conditions", and "Cancer". Below these is a breadcrumb trail: "All &gt; Health &gt; Diseases &amp; Conditions &gt; Cancer". There are "Submit" and "Cancel" buttons. The main content is a question: "What is relationship between tumor and cancer cells?". Below the question is an "Edit" button, the text "Hello,", and the question body: "I want to know about tumor and cancer cells relationship. Please reply." There is a "Thanks." message and "0 following" indicator. At the bottom, there is a text input field with the placeholder "Add your answer". A red box highlights the breadcrumb trail and buttons. A callout box points to the "Cancer" category with the text "Selection of the category by the user".</p> <p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>
<p>after receiving the selection of the category by the 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</p>	<p>Plaintiff contends that each participant on Oath Answers can select one or more categories based on his interest or expertise or knowledge so that he can answer any questions (related to those categories) of one or more users. When user posts any question or inquiry along with selection of the category (for unidentified respondents), those participants who have opted the same category which is mentioned in user’s inquiry, they can see the user’s question or inquiry on their profile pages and can respond to the user’s inquiry.</p>

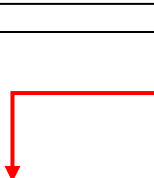
Claim 1	Accused Product or Service
<p>correspond to each participant;</p> <div data-bbox="217 848 462 1236" style="border: 1px solid black; border-radius: 15px; padding: 10px; width: fit-content;"> <p>Each participant can select at least one category to answer any questions related to that category.</p> </div>	 <p><b>2</b> Browse through categories and choose some that you believe you know a lot in or could be helpful in.</p> <p><b>Attachment 6 (How to Become a Oath Answers Top Contributor (Webpage)) at 1.</b></p>

Claim 1	Accused Product or Service
	 <p>4 Stick to the categories you have chosen.</p>
	<p><i>Id.</i> at 2.</p>  <p>5 Once you earn the badge, you must remain active in those categories, or the badge will be taken away from you.</p> <p><i>Id.</i> at 3.</p>

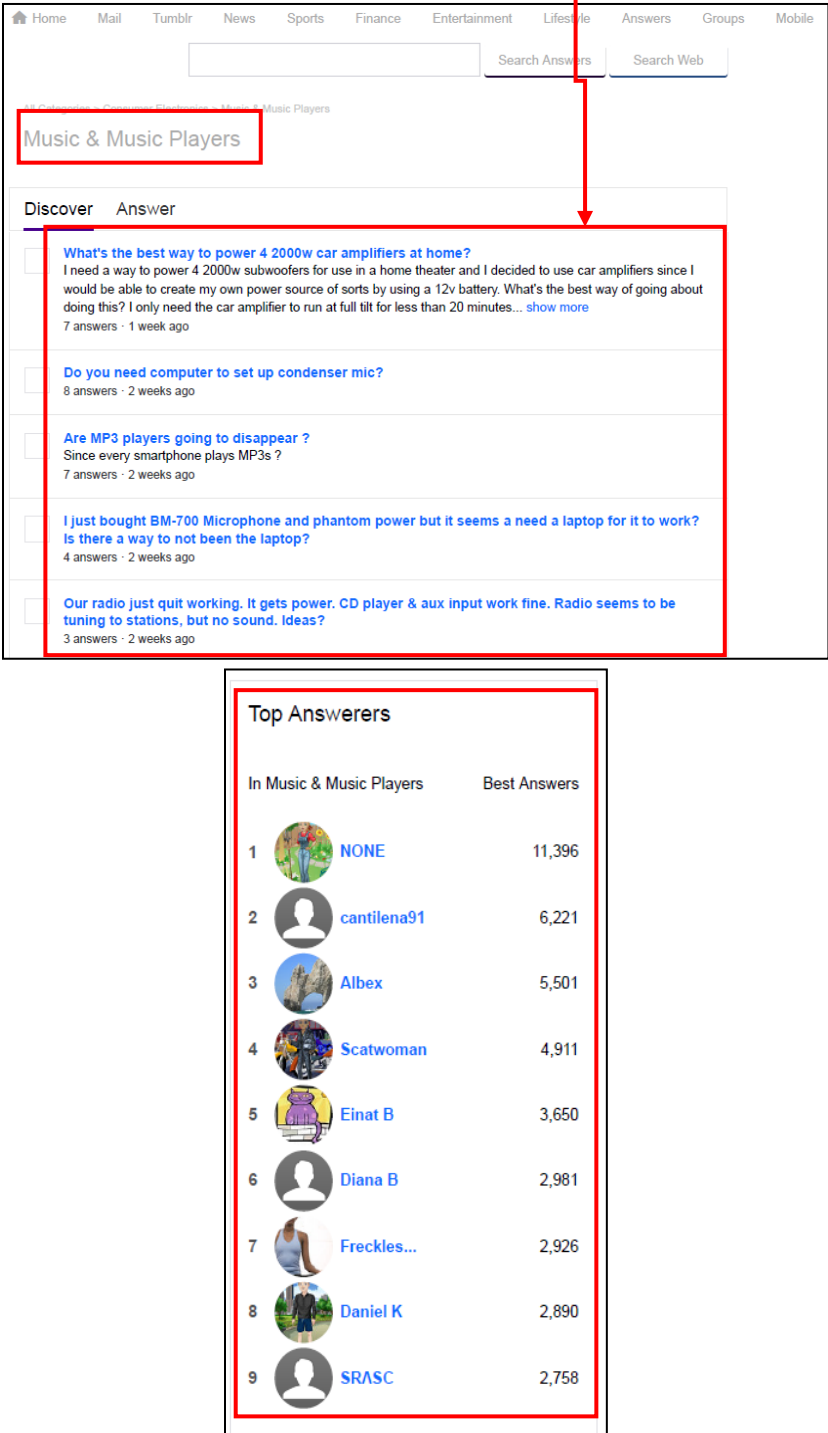



























Claim 1	Accused Product or Service																														
	<div data-bbox="613 268 1414 296"> <a href="#">Home</a> <a href="#">Mail</a> <a href="#">Tumblr</a> <a href="#">News</a> <a href="#">Sports</a> <a href="#">Finance</a> <a href="#">Entertainment</a> <a href="#">Lifestyle</a> <a href="#">Answers</a> <a href="#">Groups</a> <a href="#">Mobile</a> </div> <div data-bbox="792 310 1321 352"> <input type="text"/> <input type="button" value="Search Answers"/> <input type="button" value="Search Web"/> </div> <div data-bbox="623 382 932 401"> <p>All Categories &gt; Consumer Electronics &gt; Music &amp; Music Players</p> </div> <div data-bbox="623 409 846 441"> <p><b>Music &amp; Music Players</b></p> </div> <div data-bbox="623 495 779 522"> <p><u>Discover</u> Answer</p> </div> <div data-bbox="623 548 1365 1031"> <ul style="list-style-type: none"> <li data-bbox="623 548 1365 674"> <p><input type="checkbox"/> <a href="#">What's the best way to power 4 2000w car amplifiers at home?</a>                      I need a way to power 4 2000w subwoofers for use in a home theater and I decided to use car amplifiers since I would be able to create my own power source of sorts by using a 12v battery. What's the best way of going about doing this? I only need the car amplifier to run at full tilt for less than 20 minutes... <a href="#">show more</a>                      7 answers · 1 week ago</p> </li> <li data-bbox="623 688 1365 747"> <p><input type="checkbox"/> <a href="#">Do you need computer to set up condenser mic?</a>                      8 answers · 2 weeks ago</p> </li> <li data-bbox="623 762 1365 835"> <p><input type="checkbox"/> <a href="#">Are MP3 players going to disappear ?</a>                      Since every smartphone plays MP3s ?                      7 answers · 2 weeks ago</p> </li> <li data-bbox="623 850 1365 934"> <p><input type="checkbox"/> <a href="#">I just bought BM-700 Microphone and phantom power but it seems a need a laptop for it to work? Is there a way to not been the laptop?</a>                      4 answers · 2 weeks ago</p> </li> <li data-bbox="623 949 1365 1031"> <p><input type="checkbox"/> <a href="#">Our radio just quit working. It gets power. CD player &amp; aux input work fine. Radio seems to be tuning to stations, but no sound. Ideas?</a>                      3 answers · 2 weeks ago</p> </li> </ul> </div> <div data-bbox="841 1087 990 1115"> <p><b>Top Answers</b></p> </div> <div data-bbox="841 1161 1179 1837"> <table border="1"> <thead> <tr> <th colspan="2">In Music &amp; Music Players</th> <th>Best Answers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td> <a href="#">NONE</a></td> <td>11,396</td> </tr> <tr> <td>2</td> <td> <a href="#">cantilena91</a></td> <td>6,221</td> </tr> <tr> <td>3</td> <td> <a href="#">Albex</a></td> <td>5,501</td> </tr> <tr> <td>4</td> <td> <a href="#">Scatwoman</a></td> <td>4,911</td> </tr> <tr> <td>5</td> <td> <a href="#">Einat B</a></td> <td>3,650</td> </tr> <tr> <td>6</td> <td> <a href="#">Diana B</a></td> <td>2,981</td> </tr> <tr> <td>7</td> <td> <a href="#">Freckles...</a></td> <td>2,926</td> </tr> <tr> <td>8</td> <td> <a href="#">Daniel K</a></td> <td>2,890</td> </tr> <tr> <td>9</td> <td> <a href="#">SRASC</a></td> <td>2,758</td> </tr> </tbody> </table> </div>	In Music & Music Players		Best Answers	1	 <a href="#">NONE</a>	11,396	2	 <a href="#">cantilena91</a>	6,221	3	 <a href="#">Albex</a>	5,501	4	 <a href="#">Scatwoman</a>	4,911	5	 <a href="#">Einat B</a>	3,650	6	 <a href="#">Diana B</a>	2,981	7	 <a href="#">Freckles...</a>	2,926	8	 <a href="#">Daniel K</a>	2,890	9	 <a href="#">SRASC</a>	2,758
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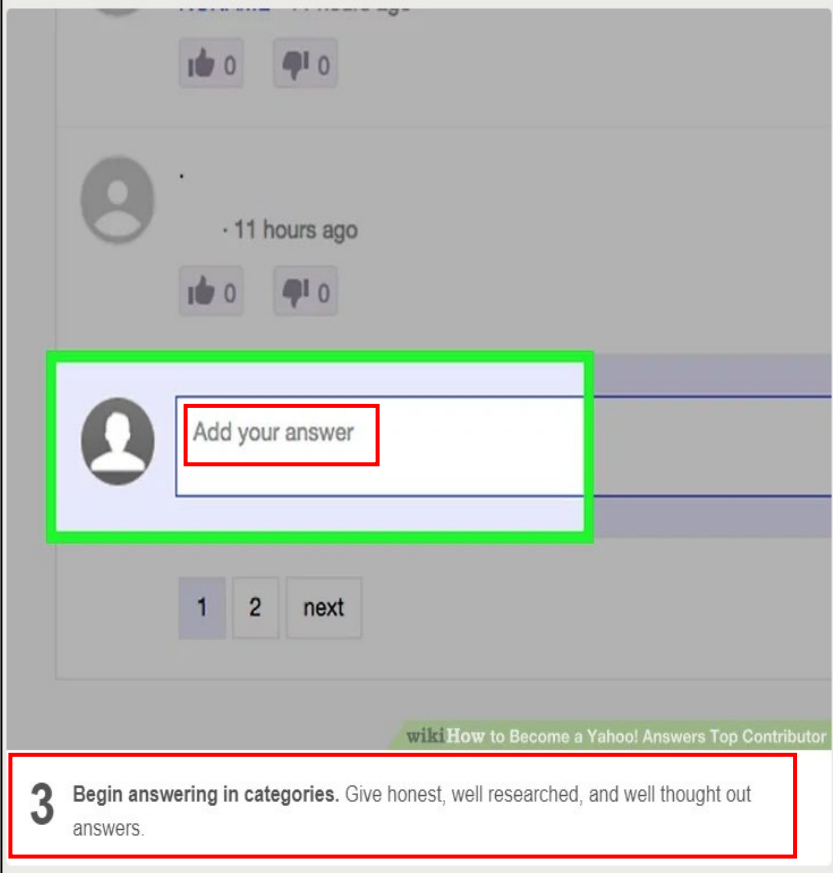
Claim 1	Accused Product or Service
	<p><b>Attachment 7 (Music &amp; Music Players   Oath Answers (Webpage, 2018)) at 1 and 2.</b></p> <div data-bbox="602 541 1419 695" style="border: 1px solid black; border-radius: 15px; padding: 10px;"><p>Based on the selection of category or participant information (that is, category interests), one or more participants are shortlisted so that they can view user’s inquiry or question.</p></div>
<p>sending the inquiry to the selected one or more participants;</p>	<p>Plaintiff contends that in case of Oath Answers, user’s inquiry is shared with one or more participants.</p>


Claim 1	Accused Product or Service
	<div data-bbox="602 394 1422 468" style="border: 1px solid black; border-radius: 10px; padding: 5px; text-align: center;">User's inquiry is shared with one or more participants</div>






Claim 1	Accused Product or Service																																	
	 <p>The screenshot shows a Quora page for the category "Music &amp; Music Players". A red box highlights a question: "What's the best way to power 4 2000w car amplifiers at home?". Below the question are several answers. Another red box highlights the "Top Answerers" section, which lists the top contributors in this category.</p> <table border="1" data-bbox="824 968 1203 1728"> <thead> <tr> <th colspan="3">Top Answerers</th> </tr> <tr> <th>In Music &amp; Music Players</th> <th></th> <th>Best Answers</th> </tr> </thead> <tbody> <tr> <td>1</td> <td> NONE</td> <td>11,396</td> </tr> <tr> <td>2</td> <td> cantilena91</td> <td>6,221</td> </tr> <tr> <td>3</td> <td> Albex</td> <td>5,501</td> </tr> <tr> <td>4</td> <td> Scatwoman</td> <td>4,911</td> </tr> <tr> <td>5</td> <td> Einat B</td> <td>3,650</td> </tr> <tr> <td>6</td> <td> Diana B</td> <td>2,981</td> </tr> <tr> <td>7</td> <td> Freckles...</td> <td>2,926</td> </tr> <tr> <td>8</td> <td> Daniel K</td> <td>2,890</td> </tr> <tr> <td>9</td> <td> SRASC</td> <td>2,758</td> </tr> </tbody> </table>	Top Answerers			In Music & Music Players		Best Answers	1	 NONE	11,396	2	 cantilena91	6,221	3	 Albex	5,501	4	 Scatwoman	4,911	5	 Einat B	3,650	6	 Diana B	2,981	7	 Freckles...	2,926	8	 Daniel K	2,890	9	 SRASC	2,758
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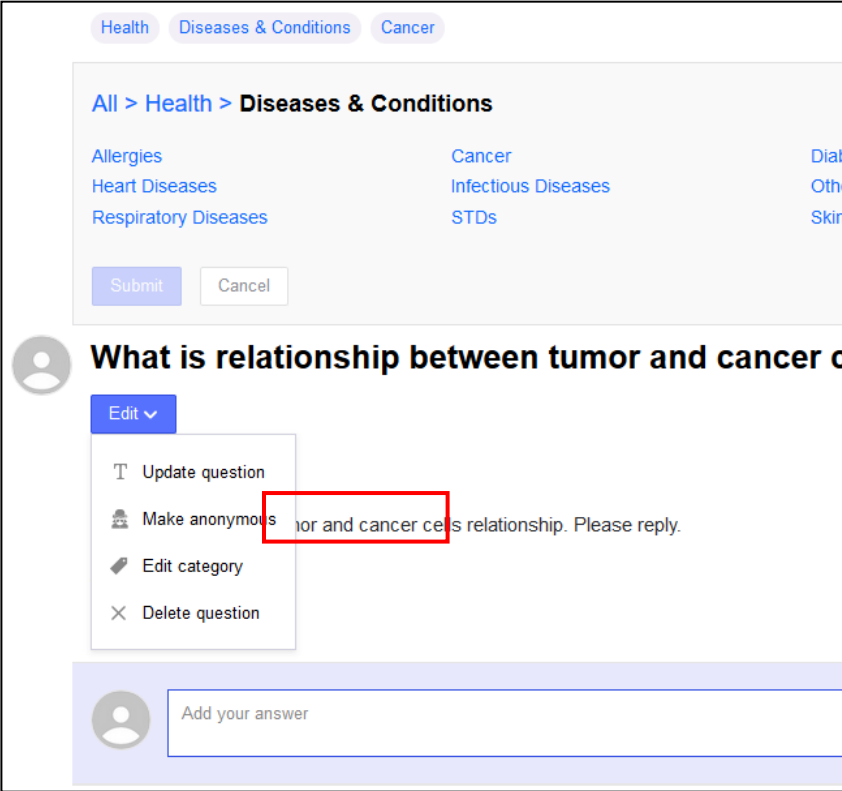
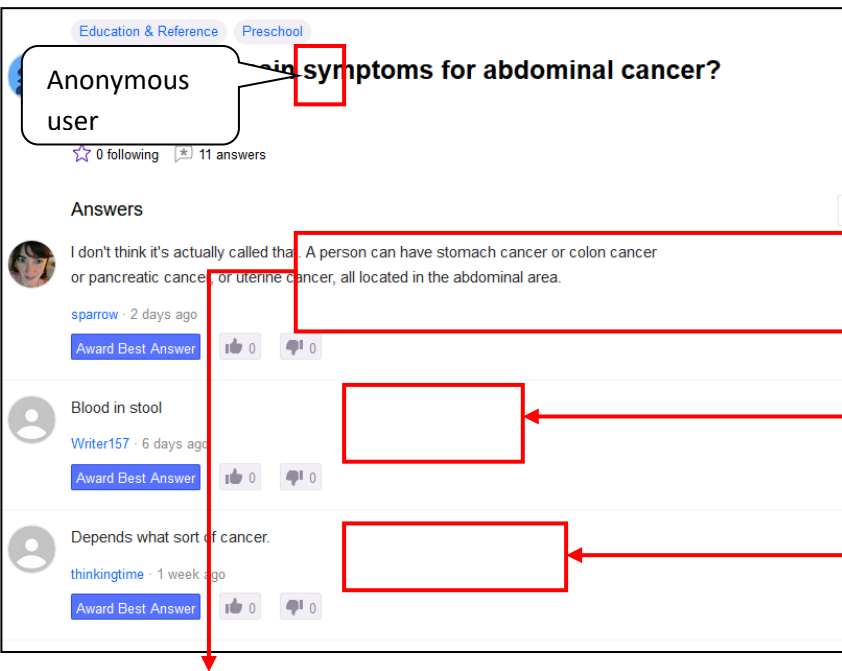
Claim 1	Accused Product or Service
	<p><b>Attachment 7 (Music &amp; Music Players   Oath Answers (Webpage, 2018)) at 1 and 2.</b></p>
<p>receiving a response to the inquiry from the selected one or more participants, the response from each of the one or more participants including biographical information about that participant;</p>	<p>Plaintiff contends that one or more participants can respond to the user's inquiry. Each participant's biographical information is also shared along with the response.</p>  <p><b>Attachment 6 (How to Become a Oath Answers Top Contributor (Webpage)) at 2.</b></p>

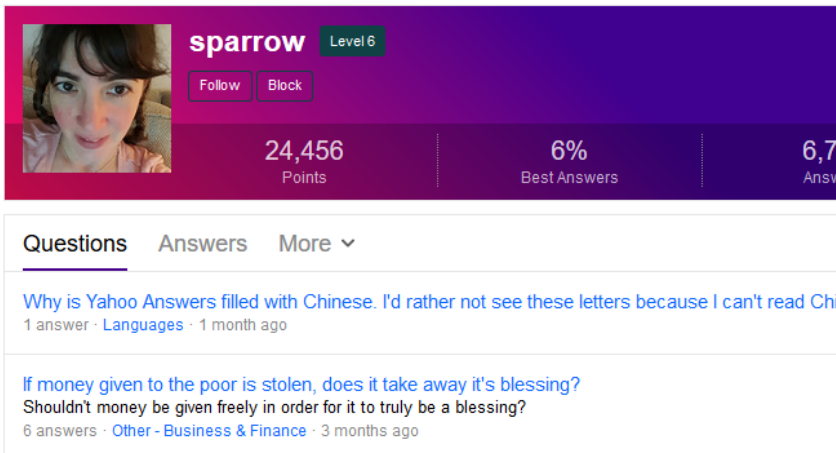
Claim 1	Accused Product or Service
<p data-bbox="261 646 532 720">User's inquiry</p> <p data-bbox="240 877 511 1182">Responses from one or more participants along with bibliographic information</p>	<div data-bbox="613 275 1414 737" style="border: 2px solid red; padding: 5px;">  <p><b>Custom costume order gon wrong, what do I do?? Please, please help..?</b></p> <p>Okay.. so i ordered this costume for comicon and she told me she could make it exactly like the photo i sent, she said exactly like the photo.. bell i got photos today and it resembled the costum at best.. i dont know what to do. The order is 2 months over due (I ordered it in january she said id have it by the end of February) and now comicon is in a little over 5 weeks way and its not even done! I m so pissed right now. I dont know what to do.. i want to cancel my order but shes put so much work and money into, and I ve put more then \$200 into it.. i dont want to lose my money.. and I dont want her to lose money but all at the same time.. i dont want this costume it looks nothing like how she promised.. now.. what do i do? What do I tell her? I dont want to hurt her feelings.. she trued very hard in the beginning now it looks like shes just slapping it together. Not to mention it takes forevet to get her to communicate with me.</p> <p style="text-align: right;">Follow   3 answers</p> </div> <div data-bbox="613 800 1414 1325" style="border: 2px solid red; padding: 5px; margin-top: 10px;"> <p><b>Answers</b> <span style="float: right;">Relevance</span></p> <div data-bbox="625 863 678 919"> </div> <p><b>Best Answer:</b> Look, sometimes you just have to hurt people's feelings. If it's not what it's supposed to be and she's two months behind schedule, that's unacceptable.</p> <p>Follow whatever steps the website has to request your money back. Take any emails you have about how long she said she'd take to do it, and any proof you have about it not looking how she promised, and send those along too.</p> <div data-bbox="678 1062 854 1094" style="border: 1px solid red; padding: 2px;"> <p>Ashley M · 1 year ago</p> </div> <div data-bbox="695 1104 808 1136" style="display: flex; gap: 10px;"> <span>1</span> <span>0</span> </div> <p style="text-align: right;"><a href="#">Comment</a></p> <p><b>Asker's rating</b> ★★★★★</p> <div data-bbox="625 1230 678 1287"> </div> <p>If she can't fulfill the contract at this point, she's entitled to the costs of the fabric she's had to buy.</p> </div> <div data-bbox="695 1325 1377 1377"> <p>Cut your loss, cancel the work, let her keep the \$200. Find someone local next time to do the sewing.</p> </div> <div data-bbox="695 1388 854 1419" style="border: 1px solid red; padding: 2px;"> <p>Elaine M · 1 year ago</p> </div>

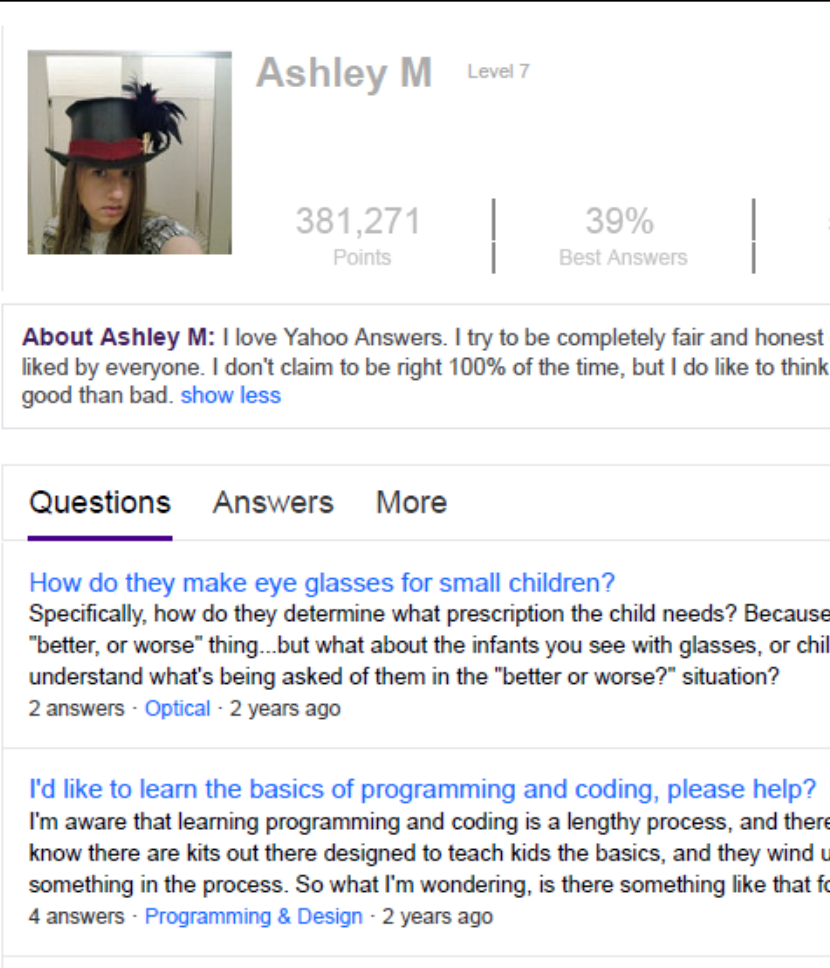
**Attachment 8 (Custom costume order gon wrong, what do I do?? Please, please help..? | Oath Answers (Webpage)) at 1.**

Claim 1	Accused Product or Service														
	<div data-bbox="618 327 1416 401" style="border: 1px solid black; padding: 5px; text-align: center;">Participant's bibliographic information</div> <div data-bbox="613 449 1427 800" style="border: 2px solid red; padding: 10px; margin-top: 10px;">  <p data-bbox="768 478 946 520"><b>Ashley M</b> Level 7</p> <table border="0" data-bbox="792 604 1372 667"> <tr> <td style="text-align: center;">381,271</td> <td style="text-align: center;"> </td> <td style="text-align: center;">39%</td> <td style="text-align: center;"> </td> <td style="text-align: center;">55,340</td> <td style="text-align: center;"> </td> <td style="text-align: center;">569</td> </tr> <tr> <td style="text-align: center; font-size: small;">Points</td> <td></td> <td style="text-align: center; font-size: small;">Best Answers</td> <td></td> <td style="text-align: center; font-size: small;">Answers</td> <td></td> <td style="text-align: center; font-size: small;">Questions</td> </tr> </table> <p data-bbox="618 709 1416 783"><b>About Ashley M:</b> I love Yahoo Answers. I try to be completely fair and honest even if I know that my answer may not be liked by everyone. I don't claim to be right 100% of the time, but I do like to think that my honesty and frankness does more good than bad. <a href="#">show less</a></p> </div> <div data-bbox="613 831 1427 1255" style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p data-bbox="625 846 894 873"><b>Questions</b>   Answers   More</p> <hr/> <p data-bbox="625 915 1000 942"><a href="#">How do they make eye glasses for small children?</a></p> <p data-bbox="625 942 1369 1020">Specifically, how do they determine what prescription the child needs? Because older children and adults can do the "better, or worse" thing...but what about the infants you see with glasses, or children who don't talk yet, or wouldn't understand what's being asked of them in the "better or worse?" situation?</p> <p data-bbox="625 1022 826 1045">2 answers · <a href="#">Optical</a> · 2 years ago</p> <hr/> <p data-bbox="625 1089 1130 1117"><a href="#">I'd like to learn the basics of programming and coding, please help?</a></p> <p data-bbox="625 1117 1406 1194">I'm aware that learning programming and coding is a lengthy process, and there's LOTS of different languages to learn. I know there are kits out there designed to teach kids the basics, and they wind up building an actual little program or something in the process. So what I'm wondering, is there something like that for adults who are... <a href="#">show more</a></p> <p data-bbox="625 1197 924 1220">4 answers · <a href="#">Programming &amp; Design</a> · 2 years ago</p> </div> <p data-bbox="597 1339 1386 1375" style="text-align: center; margin-top: 20px;"><b>Attachment 9 (Questions   Oath Answers (Webpage)) at 1.</b></p>	381,271		39%		55,340		569	Points		Best Answers		Answers		Questions
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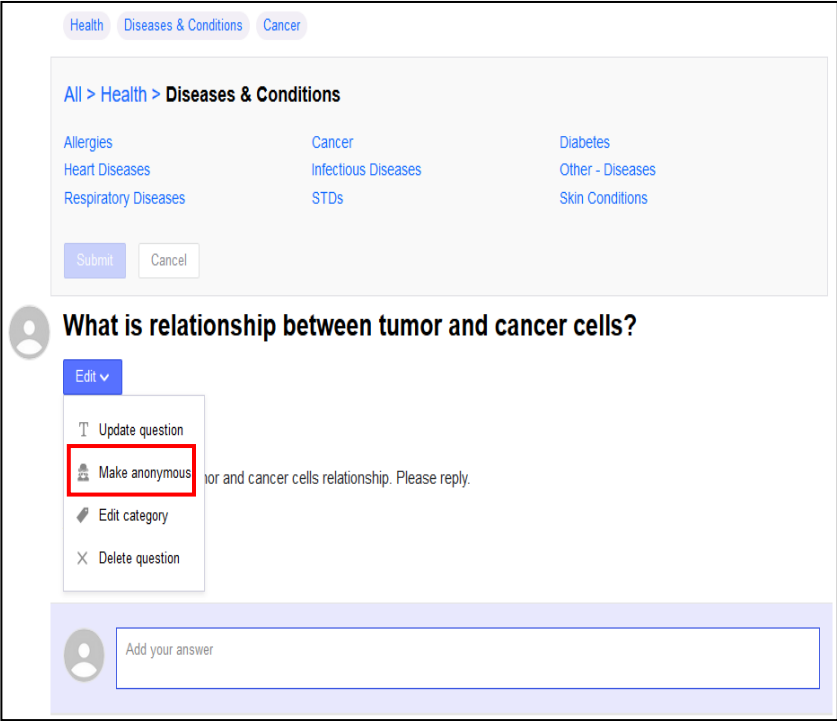
Claim 1	Accused Product or Service
	 <p><b>Attachment 4 (Questions   Oath Answers (Webpage, 2018)) at 1.</b></p>
<p>publishing at least a portion of the response from each of the selected one or more participants for other users to view, wherein publishing is performed without identifying the user but 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 Oath Answers, user can anonymously post his inquiry 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="841 1633 1624 1724" style="border: 1px solid black; padding: 5px; margin-top: 20px;"> <p>User can anonymously share his inquiry in which case user’s identity is hidden</p> </div>

Claim 1	Accused Product or Service
	 <p>The screenshot shows a Yahoo! Answers page. At the top, there are navigation tabs for 'Health', 'Diseases &amp; Conditions', and 'Cancer'. Below this is a breadcrumb trail: 'All &gt; Health &gt; Diseases &amp; Conditions'. A list of categories is visible, including 'Allergies', 'Heart Diseases', 'Respiratory Diseases', 'Cancer', 'Infectious Diseases', 'STDs', 'Diabetes', 'Other', and 'Skin'. There are 'Submit' and 'Cancel' buttons. The main question is 'What is relationship between tumor and cancer cells'. A dropdown menu is open over the question, showing options: 'Update question', 'Make anonymous' (highlighted with a red box), 'Edit category', and 'Delete question'. Below the question is an 'Add your answer' input field.</p>
	<p>[Snapshot taken after creating a user profile in Yahoo! Answers]</p>
	 <p>The screenshot shows a Yahoo! Answers page for the question 'What are the symptoms for abdominal cancer?'. The user is identified as 'Anonymous user'. The question has 0 following and 11 answers. The 'Answers' section is visible, with three answers shown. The first answer is from 'sparrow' (2 days ago) and states: 'I don't think it's actually called that. A person can have stomach cancer or colon cancer or pancreatic cancer or uterine cancer, all located in the abdominal area.' The second answer is from 'Writer157' (6 days ago) and says 'Blood in stool'. The third answer is from 'thinkingtime' (1 week ago) and says 'Depends what sort of cancer.' Red boxes and arrows highlight the question title, the 'Anonymous user' profile, and the first three answers.</p>

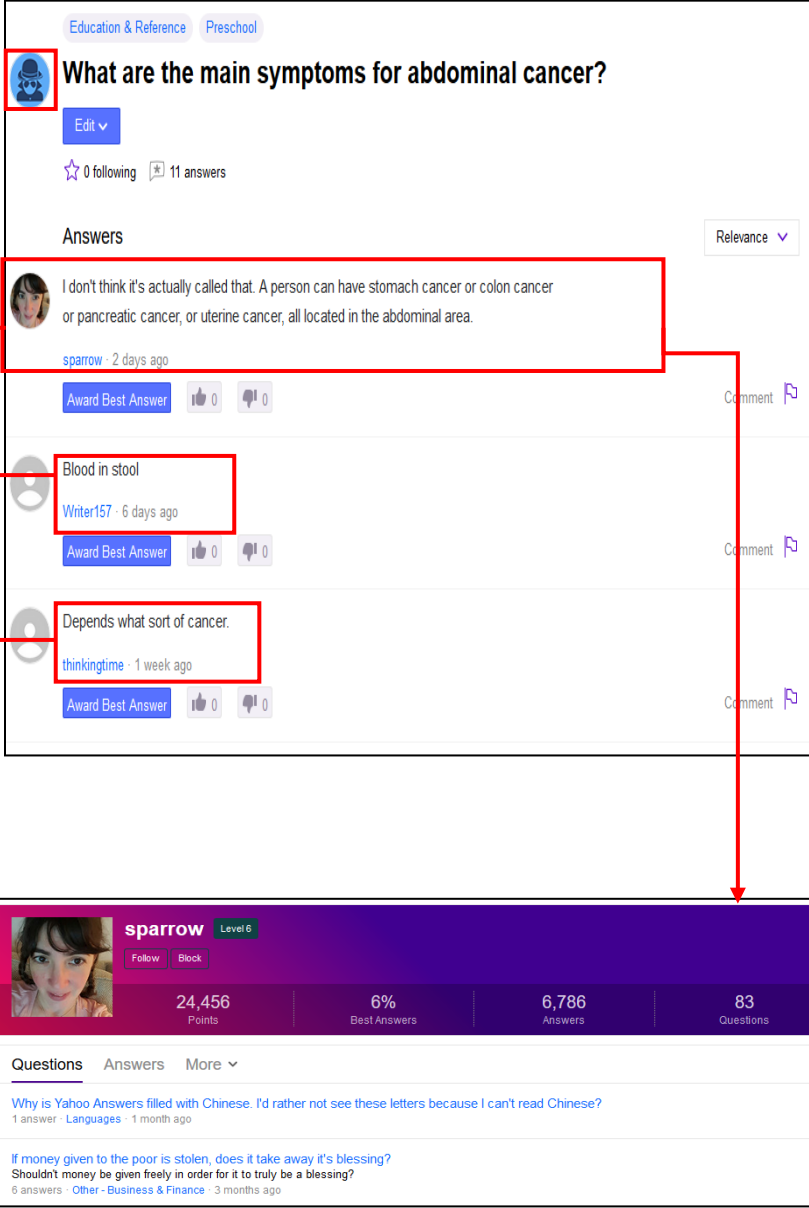
Claim 1	Accused Product or Service
	 <p data-bbox="597 745 1377 779"><b>[Snapshot taken after creating a user profile in Yahoo! Answers]</b></p> <p data-bbox="878 856 1448 947">Example of biographical information</p>

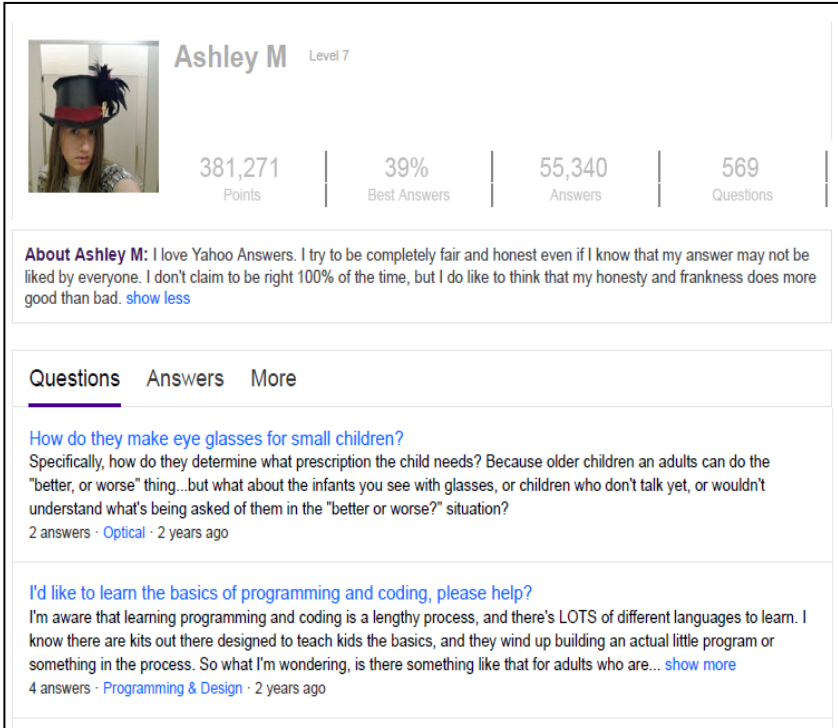
Claim 1	Accused Product or Service
	<div data-bbox="613 264 1438 1226">  <p><b>Ashley M</b> Level 7</p> <p>381,271 Points   39% Best Answers</p> <p><b>About Ashley M:</b> I love Yahoo Answers. I try to be completely fair and honest and am liked by everyone. I don't claim to be right 100% of the time, but I do like to think I'm good than bad. <a href="#">show less</a></p> <p><b>Questions</b>   <b>Answers</b>   <b>More</b></p> <p><a href="#">How do they make eye glasses for small children?</a> Specifically, how do they determine what prescription the child needs? Because of the "better, or worse" thing...but what about the infants you see with glasses, or children who don't understand what's being asked of them in the "better or worse?" situation? 2 answers · <a href="#">Optical</a> · 2 years ago</p> <p><a href="#">I'd like to learn the basics of programming and coding, please help?</a> I'm aware that learning programming and coding is a lengthy process, and there are kits out there designed to teach kids the basics, and they wind up doing something in the process. So what I'm wondering, is there something like that for adults? 4 answers · <a href="#">Programming &amp; Design</a> · 2 years ago</p> </div> <p data-bbox="597 1255 1328 1289"><b>Attachment 9 (Questions   Yahoo Answers (Webpage)) at 1.</b></p> <div data-bbox="613 1730 1419 1843"> <p>User can anonymously share his inquiry in which case user's identity remains hidden</p> </div>






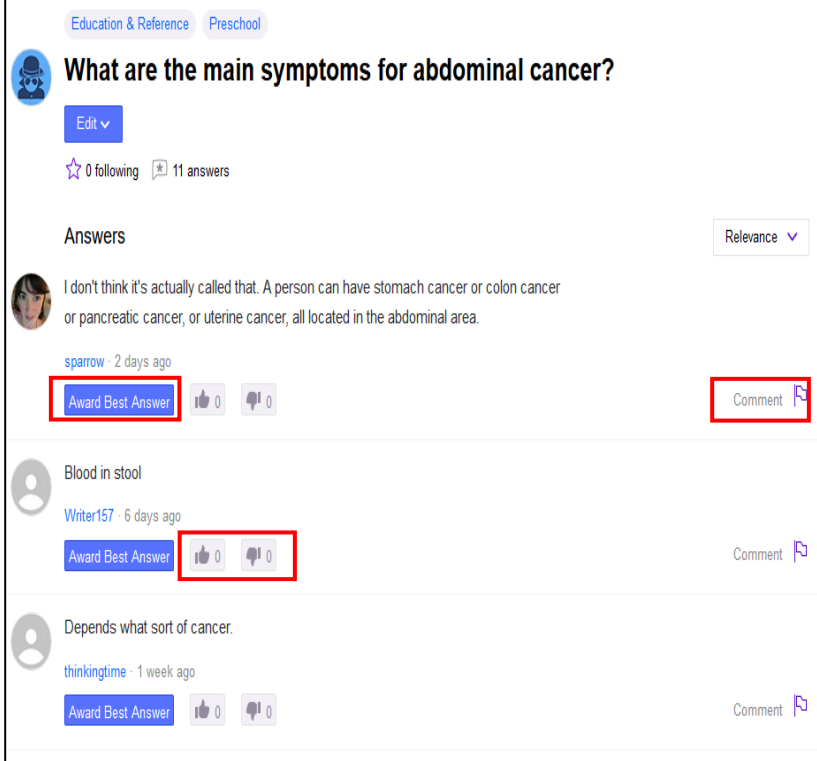



Claim 1	Accused Product or Service
	 <p>The screenshot shows a web interface for a Q&amp;A site. At the top, there are breadcrumb links: Health &gt; Diseases &amp; Conditions &gt; Cancer. Below this is a navigation menu with categories: Allergies, Heart Diseases, Respiratory Diseases, Cancer, Infectious Diseases, STDs, Diabetes, Other - Diseases, and Skin Conditions. There are 'Submit' and 'Cancel' buttons. The main content area features a question: 'What is relationship between tumor and cancer cells?' with an 'Edit' dropdown menu. The dropdown menu includes options: 'Update question', 'Make anonymous' (highlighted with a red box), 'Edit category', and 'Delete question'. Below the question is a text input field with the placeholder 'Add your answer'.</p>

**[Snapshot taken after creating a user profile in Oath Answers]**

Claim 1	Accused Product or Service
<p data-bbox="212 302 516 401">Anonymous user</p> <p data-bbox="240 541 469 1052">Responses from one or more participants are displayed for other users to view without identifying the user</p>	 <p data-bbox="610 264 1414 296">Education &amp; Reference    Preschool</p> <p data-bbox="610 310 1414 373"><b>What are the main symptoms for abdominal cancer?</b></p> <p data-bbox="610 373 1414 447">Edit ▾ 0 following    11 answers</p> <p data-bbox="610 485 1414 516">Answers <span style="float: right;">Relevance ▾</span></p> <p data-bbox="610 527 1268 632">I don't think it's actually called that. A person can have stomach cancer or colon cancer or pancreatic cancer, or uterine cancer, all located in the abdominal area. sparrow · 2 days ago</p> <p data-bbox="610 642 1414 674">Award Best Answer    0    0    Comment</p> <p data-bbox="610 716 841 789">Blood in stool Writer157 · 6 days ago</p> <p data-bbox="610 800 1414 831">Award Best Answer    0    0    Comment</p> <p data-bbox="610 863 867 936">Depends what sort of cancer. thinkingtime · 1 week ago</p> <p data-bbox="610 947 1414 978">Award Best Answer    0    0    Comment</p> <hr/> <p data-bbox="610 1157 1414 1293"><b>sparrow</b> Level 6 Follow    Block 24,456 Points    6% Best Answers    6,786 Answers    83 Questions</p> <p data-bbox="610 1314 1414 1346">Questions    Answers    More ▾</p> <p data-bbox="610 1356 1414 1388">Why is Yahoo Answers filled with Chinese. I'd rather not see these letters because I can't read Chinese? 1 answer · Languages · 1 month ago</p> <p data-bbox="610 1409 1414 1461">If money given to the poor is stolen, does it take away it's blessing? Shouldn't money be given freely in order for it to truly be a blessing? 6 answers · Other - Business &amp; Finance · 3 months ago</p> <p data-bbox="610 1486 1414 1566"><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>

Claim 1	Accused Product or Service
	<div data-bbox="646 327 1214 466" style="border: 1px solid black; border-radius: 10px; padding: 5px; margin-bottom: 10px;"> <p>Example of biographical information</p> </div> <div data-bbox="599 495 1432 1218" style="border: 1px solid black; padding: 10px;">  <p><b>Ashley M</b> Level 7</p> <p>381,271 Points   39% Best Answers   55,340 Answers   569 Questions</p> <p><b>About Ashley M:</b> I love Yahoo Answers. I try to be completely fair and honest even if I know that my answer may not be liked by everyone. I don't claim to be right 100% of the time, but I do like to think that my honesty and frankness does more good than bad. <a href="#">show less</a></p> <p>Questions   Answers   More</p> <p><a href="#">How do they make eye glasses for small children?</a> Specifically, how do they determine what prescription the child needs? Because older children an adults can do the "better, or worse" thing...but what about the infants you see with glasses, or children who don't talk yet, or wouldn't understand what's being asked of them in the "better or worse?" situation? 2 answers · Optical · 2 years ago</p> <p><a href="#">I'd like to learn the basics of programming and coding, please help?</a> I'm aware that learning programming and coding is a lengthy process, and there's LOTS of different languages to learn. I know there are kits out there designed to teach kids the basics, and they wind up building an actual little program or something in the process. So what I'm wondering, is there something like that for adults who are... <a href="#">show more</a> 4 answers · Programming &amp; Design · 2 years ago</p> </div> <p><b>Attachment 9 (Questions   Oath Answers (Webpage)) 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 the provided response. That is, user can provide rating to at least one of the selected one or more participants.</p> <p>In case of Oath Answers, user can provide ratings out of 5 stars to one or more participants based on their responses and can award “Best Answer” to one of the responses. Besides, the user also has options to “Like” or “Dislike” the response of each participant or can provide his comment on each participant’s response.</p>

Claim 1	Accused Product or Service
<p data-bbox="250 793 477 1031">Based on the response, the user can provide his feedback or rating to one or more participants</p>	<div data-bbox="623 281 1409 359">  <p><b>Custom costume order gon wrong, what do I do?? Please, please help..?</b></p> </div> <p data-bbox="695 380 1409 674">Okay.. so i ordered this costume for comicon and she told me she could make it exactly like the photo i sent, she said exactly like the photo.. bell i got photos today and it resembled the costum at best.. i dont know what to do. The order is 2 months over due (I ordered it in january she said id have it by the end of February) and now comicon is in a little over 5 weeks way and its not even done! I m so pissed right now. I dont know what to do.. i want to cancel my order but shes put so much work and money into, and I ve put more then \$200 into it.. i dont want to lose my money.. and I dont want her to lose money but all at the same time.. i dont want this costume it looks nothing like how she promised.. now.. what do i do? What do I tell her? I dont want to hurt her feelings.. she trued very hard in the beginning now it looks like shes just slapping it together. Not to mention it takes forevet to get her to communicate with me.</p> <p data-bbox="721 695 878 716">Follow 3 answers</p> <div data-bbox="695 751 1409 779"> <p>Answers <span style="float: right;">Relevance</span></p> </div> <div data-bbox="623 800 1409 856">  <p><b>Best Answer:</b> Look, sometimes you just have to hurt people's feelings. If it's not what it's supposed to be and she's two months behind schedule, that's unacceptable.</p> </div> <p data-bbox="695 884 1409 961">Follow whatever steps the website has to request your money back. Take any emails you have about how long she said she'd take to do it, and any proof you have about it not looking how she promised, and send those along too.</p> <p data-bbox="695 982 841 1003">Ashley M · 1 year ago</p> <p data-bbox="699 1016 808 1037">1 0 <span style="float: right;">Comment</span></p> <p data-bbox="695 1058 878 1087"><b>Asker's rating *****</b></p> <div data-bbox="623 1121 1409 1178">  <p>If she can't fulfill the contract at this point, she's entitled to the costs of the fabric she's had to buy.</p> </div> <p data-bbox="695 1213 1409 1262">Cut your loss, cancel the work, let her keep the \$200. Find someone local next time to do the sewing.</p> <p data-bbox="695 1283 841 1304">Elaine M · 1 year ago</p>
	<p data-bbox="597 1339 1409 1417"><b>Attachment 8 (Custom costume order gon wrong, what do I do?? Please, please help..?   Oath Answers (Webpage)) at 1.</b></p> <div data-bbox="623 1451 1398 1682"> <p>User can provide rating to each participant's response out of 5 stars, can award best answer to one of the responses, can like or dislike each participant's response, and can also comment on each participant's response.</p> </div>

Claim 1	Accused Product or Service
	 <p>Education &amp; Reference Preschool</p> <p><b>What are the main symptoms for abdominal cancer?</b></p> <p>Edit ▾</p> <p>☆ 0 following ✎ 11 answers</p> <p>Answers <span style="float: right;">Relevance ▾</span></p> <p> I don't think it's actually called that. A person can have stomach cancer or colon cancer or pancreatic cancer, or uterine cancer, all located in the abdominal area.</p> <p>sparrow · 2 days ago</p> <p><b>Award Best Answer</b> 👍 0 👎 0 <span style="float: right;">Comment</span></p> <hr/> <p> Blood in stool</p> <p>Writer157 · 6 days ago</p> <p><b>Award Best Answer</b> 👍 0 👎 0 <span style="float: right;">Comment</span></p> <hr/> <p> Depends what sort of cancer.</p> <p>thinkingtime · 1 week ago</p> <p><b>Award Best Answer</b> 👍 0 👎 0 <span style="float: right;">Comment</span></p>
	<p><b>[Snapshot taken after creating a user profile in Oath Answers]</b></p>

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

11. Oath has and continues to induce infringement. Oath 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 services on the Internet] 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, Oath has known of the '591 patent and the technology underlying it from at least the date of issuance of the patent.

12. Oath has and continues to contributorily infringe. Oath 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 services on the Internet] 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, Oath has known of the '591 patent and the technology underlying it from at least the date of issuance of the patent.

13. Oath 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.

#### **IV. JURY DEMAND**

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

#### **V. PRAYER FOR RELIEF**

WHEREFORE, NETSOC prays for relief as follows:

- a. enter judgment that Defendant has infringed the claims of the '591 patent through OATH.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**



By: \_\_\_\_\_

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*Attorneys for NetSoc, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record in this case is served via email on this day of July 9, 2019 or ECF in this matter.

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A handwritten signature in black ink, appearing to read 'WPR', with several large, overlapping loops and flourishes extending from the letters.

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William P. Ramey, III