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12 UNITED STATES DISTRICT COURT
 13 CENTRAL DISTRICT OF CALIFORNIA

14 UNILOC 2017 LLC,

15 Plaintiff,

16 v.

17 HULU, LLC,

18 Defendant.
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CASE NO. 8:18-cv-02058-GW-DFM

Consolidated with Lead Case: 8:18-cv-02055-GW-DFM

**SECOND AMENDED COMPLAINT
 FOR PATENT INFRINGEMENT**

DEMAND FOR JURY TRIAL

1 Plaintiff Uniloc 2017 LLC (“Uniloc”), by and through the undersigned
2 counsel, hereby files this Second Amended Complaint and makes the following
3 allegations of patent infringement relating to U.S. Patent No. 9,721,273 against
4 Hulu, LLC (“Hulu”) and alleges as follows upon actual knowledge with respect to
5 itself and its own acts and upon information and belief as to all other matters:

6 **NATURE OF THE ACTION**

7 1. This is an action for patent infringement. Uniloc alleges that Hulu
8 infringes U.S. Patent No. 9,721,273 (the “’273 patent”), a copy of which is
9 attached hereto as Exhibit A (“the Asserted Patent”).

10 2. Uniloc alleges that Hulu directly infringes the Asserted Patent by
11 making, using, offering for sale, selling and/or importing products and services that
12 perform a method for providing content via a computer network and a computer
13 system. Uniloc seeks damages and other relief for Hulu’s infringement of the
14 Asserted Patent.

15 **THE PARTIES**

16 3. Uniloc 2017 LLC is a Delaware corporation having places of business
17 at 1209 Orange Street, Wilmington, Delaware 19801 and 620 Newport Center
18 Drive, Newport Beach, California 92660.

19 4. Uniloc holds all substantial rights, title and interest in and to the
20 Asserted Patent.

21 5. Upon information and belief, Defendant Hulu, LLC, is a corporation
22 organized and existing under the laws of the State of Delaware, with at least the
23 following place of business in this District: 2500 Broadway, Santa Monica, California
24 90404. Hulu may be served through its registered agent for service: CSC-Lawyers
25 Incorporating Service 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA
26 95833

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1 **JURISDICTION AND VENUE**

2 6. This action for patent infringement arises under the Patent Laws of the
3 United States, 35 U.S.C. § 1 et. seq. This Court has original jurisdiction under 28
4 U.S.C. §§ 1331 and 1338.

5 7. This Court has both general and specific jurisdiction over Hulu
6 because Hulu has committed acts within the Central District of California giving
7 rise to this action and has established minimum contacts with this forum such that
8 the exercise of jurisdiction over Hulu would not offend traditional notions of fair
9 play and substantial justice. Defendant Hulu, directly and through subsidiaries,
10 intermediaries (including distributors, retailers, franchisees and others), has
11 committed and continues to commit acts of patent infringement in this District, by,
12 among other things, making, using, testing, selling, licensing, importing and/or
13 offering for sale/license products and services that infringe the Asserted Patent.

14 8. Venue is proper in this district and division under 28 U.S.C. §§
15 1391(b)-(d) and 1400(b) because Hulu has committed acts of infringement in the
16 Central District of California and has at least one regular and established place of
17 business in the Central District of California.

18 **COUNT I– INFRINGEMENT OF U.S. PATENT NO. 9,721,273**

19 9. The allegations of paragraphs 1-8 of this First Amended Complaint are
20 incorporated by reference as though fully set forth herein.

21 10. The '273 patent, titled “System and Method For Aggregating And
22 Providing Audio And Visual Presentations Via A Computer Network,” issued on
23 August 1, 2017. A copy of the '273 patent is attached as Exhibit C. The priority
24 date for the '273 patent is August 21, 2008. The inventions of the '273 patent were
25 developed by an inventor at LINQware, Inc.

26 11. Pursuant to 35 U.S.C. § 282, the '273 patent is presumed valid.

27 12. Claim 1 of the '273 patent addresses a technological problem
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1 indigenous to webpages, search engines and the Internet—providing the most
2 relevant content to a user.

3 13. Claim 1 of the '273 patent reads as follows:

4 1. A method for providing content via a computer network and
5 computing system, the method comprising:

6 storing presentation data that represents content of a first collection of
7 one or more presentations using the computer system;

8 storing data indicative of the first collection of presentations so as to be
9 associated with the presentation data;

10 storing feed data that represents a collection of one or more feeds using
11 the computer system, wherein each of the feeds identifies a
12 corresponding second collection of one or more presentations being
13 accessible via the computer network and includes no data representing
14 content of the second collection of presentations;

15 automatically and periodically accessing each of the feeds to identify
16 each of the corresponding second collection of presentations, using the
17 computer system;

18 storing data associated with a third collection of one or more
19 presentations; and

20 aggregating each of the first, identified second, and third collections of
21 presentations for delivery via the computer network using a common
22 web page.

23 14. At the time of invention of the '273 patent, given the vastness of
24 content on the Internet, it proved “difficult for a user of an Internet enabled
25 computer to identify and locate content of a particular type and relating to a
26 particular subject.” '273 patent at 1:49-55. One way to find relevant content was
27 to use a search engine for specified keywords to return a list of documents where
28 those words are found. '273 patent at 1:56-59.

15. Some of the available search engines at the time of the invention

1 included Yahoo!, Google and search.com. '273 patent at 2:2-5. These are search
2 engines created in the mid to late 1990s that rose to prominence by the early 2000s
3 just prior to the priority date for the '273 patent. The known search engines at the
4 time suffered from drawbacks, however. The search engines at the time typically
5 utilized a webcrawler to provide documents. '273 patent at 1:59-60. An indexer
6 then typically reads the webcrawler provided documents and creates an index based
7 on the words contained in each document. '273 patent at 1:61-63. Each search
8 engine typically uses its own methodology to create indices such that, ideally, only
9 meaningful results are returned for each query. '273 patent at 1:63-65. This is not
10 always true though due to the complex nature and nuances of human language and
11 efforts by document authors or providers to fool or trick the indexer into ranking its
12 documents above those of others. '273 patent at 1:65-2:2.

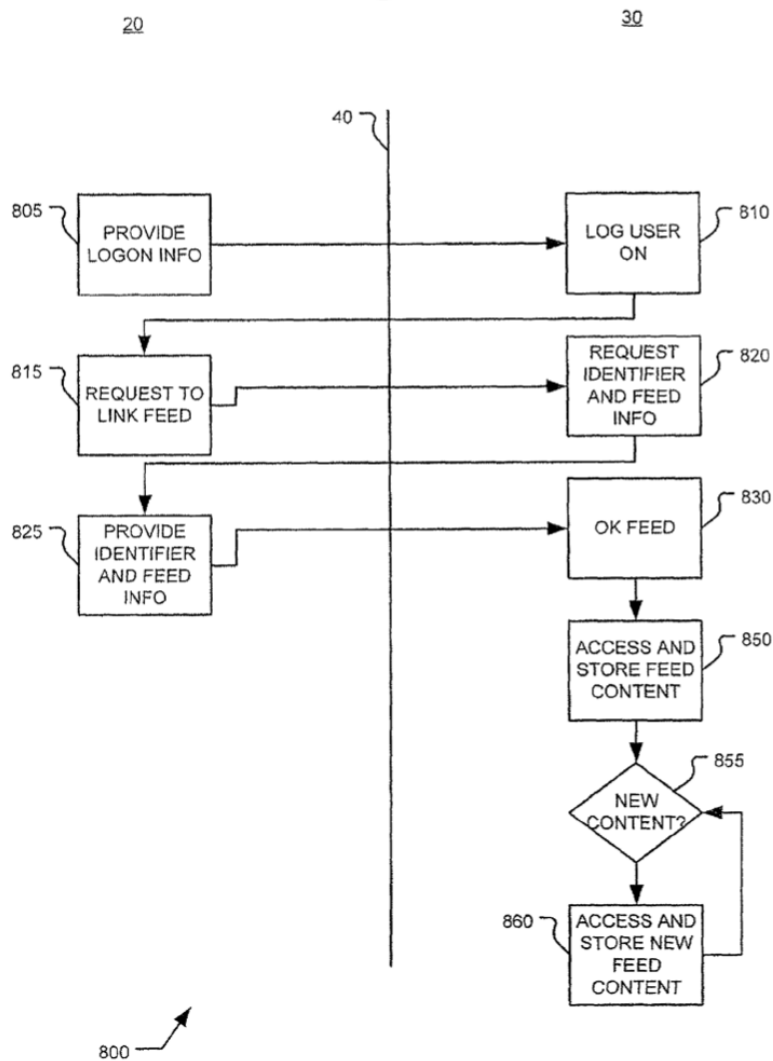
13 16. In light of the foregoing there existed a need for technology that would
14 provide more relevant content, particularly with respect to presentations for use in
15 business productivity, education, and for entertainment purposes (e.g., providing
16 videos of interest to a consumer). '273 patent at 2:6-10.

17 17. The claimed invention of claim 1 of the '273 patent provides a
18 technological solution to the problem faced by the inventor, namely to create a
19 common webpage by aggregating collections of presentations and collecting and
20 analyzing feed data from multiple feeds in at least one of the collections of
21 presentations in order to provide more relevant content to each user.

22 18. The technological solution is detailed in the specification and claim 1.
23 First, presentation data that represents content of a first collection of presentations
24 is stored. Next, data indicative of the first collection of presentations that is
25 associated with the presentation data is stored. Then feed data that represents
26 various feeds that identify a second collection of presentations (but has no data
27 representing the content) is stored. The feed data is then automatically and
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1 periodically accessed to identify the corresponding second collection of
 2 presentations. Data associated with a third collection of presentations is also stored.
 3 Finally, the first, second, and third collections of presentations are aggregated for
 4 delivery using a common webpage. '273 patent at 2:15-3:10, 10:63-12:29, Fig. 8,
 5 claim 1.

6 **Fig. 8**



It should further be understood such a content acquisition provides additional advantages. For example, each user wishing to identify and view content available via an RSS feed may conventionally need to obtain and operate an RSS reader application. Further, each such RSS reader application would need to access each identified RSS feed. This

1 leads to substantial bandwidth usage, for example. In contrast, certain
2 embodiments of the present invention permit a user to access RSS
3 content without the need for his own RSS reader. Further, embodiments
4 of the present invention only require that system 30 access each RSS
5 feed, as opposed to each system 30 user computer 20 wishing to access
6 the RSS feeds, leading to substantial savings in network resources.
7 Further, certain embodiments of the present invention allow user to
8 access and compare content available via RSS feeds they are not even
9 aware of, e.g., by their interaction with webpage 200 as discussed above,
10 where webpage 200 includes content added using the methodology of
11 process 800, for example. Accordingly, certain embodiments of the
12 present invention provide for enhanced content syndication and
13 aggregation, as compared to even RSS feeds themselves, for example.
14 And, certain embodiments of the present invention provide for
15 automatic aggregation of RSS fed content in combination with non-RSS
16 fed content in a single application independent of any user RSS reader
17 application.

18 '273 patent at 12:4-29 (emphasis added).

19 19. Claim 1 of the '273 patent improves the functionality of a webpage,
20 search engine and technology specific to the Internet by creating a common
21 webpage by aggregating collections of presentations and collecting and analyzing
22 feed data from multiple feeds in at least one of the collections of presentations in
23 order to provide more relevant content to each user. This is because, among other
24 reasons, there is no data representing the content of the second collection of
25 presentations in the feed data. The claimed invention of claim 1 of '273 patent also
26 was not well-understood, routine or conventional at the time of the invention.
27 Rather, as demonstrated above, the claimed invention was a departure from the
28 conventional ways of identifying presentations on the Internet via the known search
engines at the time.

29 20. In light of the foregoing, and the general knowledge of a person of
ordinary skill in the art, a person of ordinary skill in the art reading the '273 patent
and its claims would understand that the patent's disclosure and claims are drawn to
solving a specific, technical problem arising in webpage, search engine and Internet

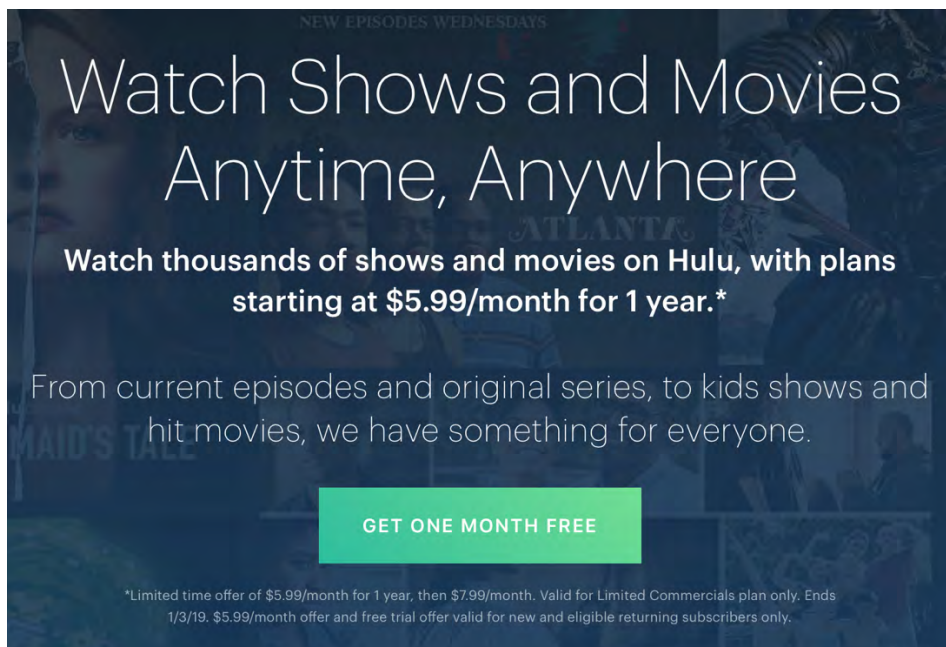
1 technology. Moreover, a person of ordinary skill in the art would understand that
2 the claimed subject matter of the '273 patent presents advancements in the field of
3 webpage, search engine and Internet technology by allowing for a common
4 webpage based on collections of presentations and collecting and analyzing feed
5 data from multiple feeds in at least one of the collections of presentations in order
6 to provide more relevant content to each user because the feed data does not include
7 data representing the content of the second collection of presentations. A person of
8 ordinary skill in the art would understand that claim 1 of the '273 patent is directed
9 to a method for creating a common webpage by aggregating collections of
10 presentations and collecting and analyzing feed data from multiple feeds in at least
11 one of the collections of presentations in order to provide more relevant content to
12 each user because the feed data does not include data representing the content of the
13 second collection of presentations. Moreover, a person of ordinary skill in the art
14 would understand that claim 1 of the '273 patent contains that corresponding
15 inventive concept.

16 21. Hulu's own patents claim subject matter in the same field. For
17 example, on January 5, 2017, more than 8 years after the priority date for the '273
18 patent, Hulu filed an application entitled, "Generation, ranking and delivery of
19 actions for entities in a video delivery system," which matured into U.S. Patent No.
20 10,212,464 on February 19, 2019 (the "'464 patent"). This patent concerns using
21 an "action feed" that is delivered to a client based on a ranking.

22 22. Upon information and belief, Hulu makes, uses, offers for sale, and/or
23 sells in the United States and/or imports into the United States products and
24 services that practice a method for providing content via a computer network and a
25 computer system (collectively the "Accused Infringing Devices").

26 23. Upon information and belief, the Accused Infringing Devices infringe
27 at least claim 1 in the exemplary manner described below.
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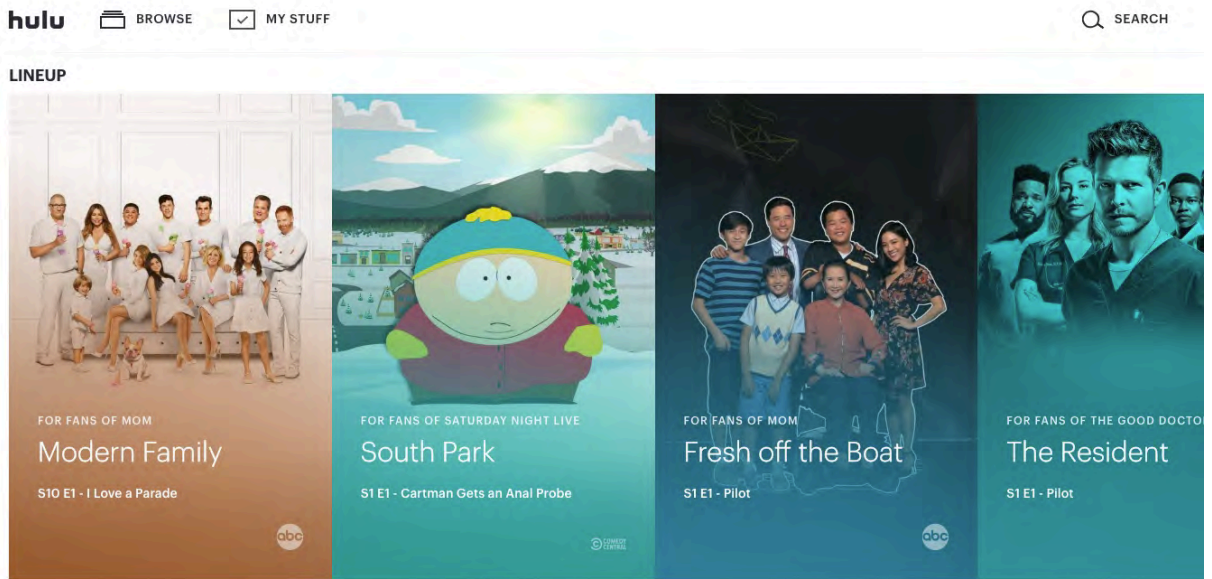
1 24. The Accused Infringing Devices perform a method for providing
2 content via a computer network and computer system. In particular, Hulu operates
3 a streaming service that delivers TV shows and movies to subscribers over the
4 Internet.



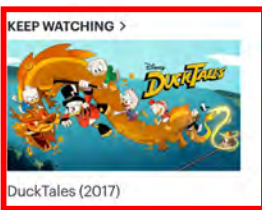
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15 **Source:** <http://www.hulu.com>

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17 25. The Accused Infringing Devices store presentation data that represents
18 content of a first collection of one or more presentations using the computer system.
19 In particular, Hulu maintains a collection of presentations that a user has started, but
20 not finished, watching. Such a collection can be displayed in several contexts,
21 including on the Hulu homepage as well as while browsing categories such as
22 “Kids.”

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Kids



Source: <http://www.hulu.com>

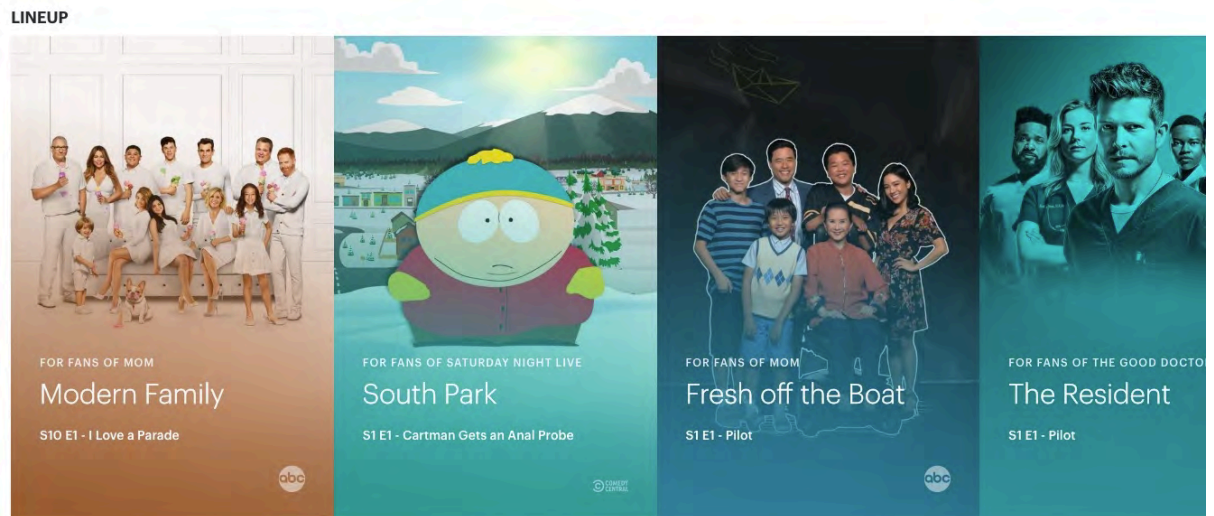
26. The Accused Infringing Devices store data indicative of the first collection of presentations so as to be associated with the presentation data. In particular, the Accused Infringing Devices store viewing data indicating the amount

1 of time the user has watched each program in the “Keep Watching” row.



10 Source: <http://www.hulu.com>

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12 27. The Accused Infringing Devices store feed data that represents a
13 collection of one or more feeds using the computer system. The Accused
14 Infringing Devices store feed data representing TV shows and movies that have
15 been recommended to the user. For example, "Line Up" is a collection of
16 presentations recommended to the user.



26 Source: <http://www.hulu.com>

1 28. “For You” is another example of a collection of presentations
2 recommended to the user through the browse category pages.

3
4 Kids



8
9 KEEP WATCHING >



12
13 Source: <http://www.hulu.com>

14 29. The Accused Infringing Devices store feed data in connection with the
15 operation of their recommendation engine. In the case of displaying the Hulu
16 homepage, the client queries the discover.hulu.com host to identify a second
17 collection of presentations (*i.e.*, recommendations labeled “Line Up”). The
18 recommendations are identified by id numbers, such as “2b4f6451-b084-450a-
19 a6d7-f116ecc85af6” (corresponding to “Chicago Med”). This operation reflects the
20 storage of feed data corresponding to the second collection by Hulu, prior to
21 transmission of the id numbers to the client.

```

1  ▼ {_type: "hub", id: "urn:hulu:hub:home",...}
2  ▼ components: [{_type: "collection", id: "135",...}, {_type: "collection", id: "282",...},...]
3  ▼ 0: {_type: "collection", id: "135",...}
4  artwork: {}
5  device_context_failure: false
6  href: "https://discover.hulu.com/content/v3/hubs/home/collections/135?schema=3"
7  id: "135"
8  is_fallback: false
9  items: [{_type: "view", id: "2b4f6451-b084-450a-a6d7-f116ecc85af6",...},...]
10 ▼ 0: {_type: "view", id: "2b4f6451-b084-450a-a6d7-f116ecc85af6",...}
11 ▶ actions: {playback: {eab: "EAB::9b2dd699-11ec-4464-b973-122b59311637::61117927::26004819",...}, browse:
12 device_context_failure: false
13 ▼ entity_metadata: {genre_names: ["Medical", "Drama", "Romance", "Action"], premiere_date: "2018-05-15T
14 ▶ genre_names: ["Medical", "Drama", "Romance", "Action"]
15 premiere_date: "2018-05-15T00:00:00Z"
16 ▶ rating: {code: "TV14"}
17 series_description: "Executive producer Dick Wolf delivers the newest installment of the compelling
18 id: "2b4f6451-b084-450a-a6d7-f116ecc85af6"
19 ▼ metrics_info: {reco_tags: "ncr|nr|uf", entity_id: "2b4f6451-b084-450a-a6d7-f116ecc85af6", entity_type
20 entity_id: "2b4f6451-b084-450a-a6d7-f116ecc85af6"
21 entity_name: "Chicago Med"
22 entity_type: "series"
23 promo_text_format: "Start Watching"
24 reco_reasons: "For Fans of The Good Doctor"
25 reco_tags: "ncr|nr|uf"
26 target_id: "2b4f6451-b084-450a-a6d7-f116ecc85af6"
27 target_name: "Chicago Med"
28 target_type: "series"
▶ personalization: {bowie_context: "cover_story", eab: "EAB::9b2dd699-11ec-4464-b973-122b59311637::6111
view_template: "cover_story_standard"
▶ visuals: {artwork: {_type: "artwork_orientation",...}, headline: "Chicago Med", action_text: "Start Wat
_type: "view"

```

Source: Screenshot of Chrome Developer Tools showing the file containing data that supports the user's experience from Hulu.com.

30. In the case of displaying a browse category page, the client queries the discover.hulu.com host to identify a second collection of presentations (*i.e.*, recommendations labeled “For You”). The recommendations are identified by id numbers, such as “671bc3fd-114f-4044-986b-b961ca527024” (corresponding to “Teen Titans Go!”). This operation reflects the storage of feed data corresponding to the second collection by Hulu, prior to transmission of the id numbers to the client.

```

1  "device_context_failure": false,
2  "components": [
3    {
4      "_type": "collection",
5      "id": "113",
6      "href": "https://discover.hulu.com/content/v3/hubs/kids/collections/113?schema=3",
7      "p3h_href": "https://discover.hulu.com/content/v3/hubs/kids/collections/113?schema=3&eab_ids=EAB:4077c039-314f-4dfc-8dc1-
8      c533a76e8a07::NULL::NULL,EAB:671bc3fd-114f-4044-986b-b961ca527024::NULL::NULL,EAB:4f96cfd5-73b9-4975-8021-
9      ea504d4c5780::NULL::NULL,EAB:4d1be259-c261-45e7-bf79-72cdf44fb9ad::NULL::NULL,EAB:2a70a30b-3ba2-4b7e-aaeb-
10     384e56596a19::NULL::NULL,EAB:f2f9e217-801f-460c-9a53-4e92ee82fe92::NULL::NULL,EAB:c4636d35-eb1b-4ac3-bf02-
11     cb83dce0ecf6::NULL::NULL,EAB:253eaa4-50d0-4b28-ab4b-1c0c015e0fa0::NULL::NULL,EAB:38364d89-c44f-47ce-985b-
12     a37a360f2b7e::NULL::NULL,EAB:bc47d2cf-6f24-4ea7-9219-1cb7ea84daba::NULL::NULL,EAB:3cb3f3c4-e908-458f-8db8-
13     5d43031995e6::NULL::NULL,EAB:45e51af5-3da2-4129-a715-51cdd5a34ccf::NULL::NULL,EAB:aaed007e-c365-4509-9eab-
14     d3713a19eab8::NULL::NULL,EAB:39dedbce-8fcd-431b-ac3f-15b562b9c742::NULL::NULL,EAB:27cefa35-f959-45df-a87b-
15     7622bec3d18f::NULL::NULL,EAB:115dd69e-a60c-4c00-8ba0-166715fb21a2::NULL::NULL,EAB:bffd458e-794f-4cb3-b748-
16     6df6ad452b7f::NULL::NULL,EAB:6f39a5a0-6e20-4bbf-b8b7-364025897b03::NULL::NULL,EAB:b86922f3-5c46-4871-adc0-
17     071e48d2d611::NULL::NULL,EAB:01b0d3e4-8b57-4cbe-9b74-e379bc60ac5a::NULL::NULL,EAB:ec95e86e-ee98-4726-9794-
18     e9dea449757c::NULL::NULL,EAB:bc455c45-a11d-43fe-ac7d-3afdfc264909::NULL::NULL,EAB:a996307f-0d34-4376-86e6-
19     b2132be03f68::NULL::NULL,EAB:7b4bf05d-a7dc-47a7-85c8-82d7a69be484::NULL::NULL,EAB:03db8986-d082-45dc-a45b-
20     586f9f85c82b::NULL::NULL,EAB:9b75f792-44c6-4a49-a2a2-48a746c6c26d::NULL::NULL,EAB:0721150b-9e72-4970-b83a-
21     f2db08fbae54::NULL::NULL,EAB:eb0bb177-6278-48ec-902d-4efb916a7a39::NULL::NULL,EAB:b7833196-8dab-411e-8728-
22     46759d8402ba::NULL::NULL,EAB:14dcb999-615b-4a66-835c-4c1d00717df8::NULL::NULL,EAB:87e268f4-1dc3-4fd3-8e41-
23     41dc246eed02::NULL::NULL,EAB:139507fa-07d2-43ca-8991-370d5306989d::NULL::NULL,EAB:f20a0f3e-b96b-48d1-bfaf-
24     13eb4616b504::NULL::NULL,EAB:c8b9c799-b81e-4522-a05b-40212f69e7a6::NULL::NULL,EAB:d072c7a0-5570-45bd-80fb-
25     227ff42aca49::NULL::NULL,EAB:031f9f6e-6de8-4482-866c-e6682208b63e::NULL::NULL,EAB:3c0bf4eb-2d7a-4b7c-a9a4-
26     668427a22aba::NULL::NULL,EAB:9626bd57-00a7-4d44-8629-543811e439ee::NULL::NULL,EAB:8baef83e-f316-4846-8ba2-
27     21cdf4c40823::NULL::NULL,EAB:5c5f6041-ff38-4670-a7f8-30033a28f4bc::NULL::NULL,EAB:7983e75d-2897-4259-8f1d-
28     50be6d2ca263::NULL::NULL,EAB:eea4f209-0f98-4b51-8b2e-ecbe2fbbd058::NULL::NULL,EAB:a4a06e0c-c4d8-4b34-a55e-
29     a28c57ecc429::NULL::NULL,EAB:5d931e25-bd29-46f2-9ba7-b5a0b4c001f8::NULL::NULL,EAB:6cfcd220-59c1-4a89-b187-
30     e990b4c51b08::NULL::NULL,EAB:b4f327be-b835-4e82-99cd-40ab04543a2d::NULL::NULL,EAB:a5481b97-adb7-4583-af31-
31     d89772d93eb9::NULL::NULL,EAB:8a15de0d-8c39-4a94-bc8f-0bfe73062d7d::NULL::NULL,EAB:4b8401fa-eb03-4871-8da0-
32     e821012cf43c::NULL::NULL,EAB:17afce6-e552-491c-86be-6a422f518c68::NULL::NULL&bowie_context=browse",
33     "name": "For You",
34     "theme": "collection_on_theme_3",
35     "artwork": {},
36     "personalization": {
37       "bowie_context": "browse"
38     }
39   }
40 ]

```

Source: Screenshot of Chrome Developer Tools showing the file containing data that supports the user’s experience from Hulu.com.

31. Each of the feeds identifies a corresponding second collection of one or more presentations being accessible via the computer network, and includes no data representing the video/audio content of the second collection of presentations. As shown above, the feed data includes the identifiers and other metadata associated with the presentations, which is not the video/audio content of the presentations. In addition, the “Line Up” feed data includes other information that is apart from the video/audio content, such as the reason(s) for recommending a particular presentation to the user and tags associated therewith.


```

1  ▼ {_type: "hub", id: "urn:hulu:hub:home",...}
2  ▼ components: [{_type: "collection", id: "135",...}, {_type: "collection", id: "282",...},...]
3  ▼ 0: {_type: "collection", id: "135",...}
4     artwork: {}
5     device_context_failure: false
6     href: "https://discover.hulu.com/content/v3/hubs/home/collections/135?schema=3"
7     id: "135"
8     is_fallback: false
9  ▼ items: [{_type: "view", id: "2b4f6451-b084-450a-a6d7-f116ecc85af6",...},...]
10  ▼ 0: {_type: "view", id: "2b4f6451-b084-450a-a6d7-f116ecc85af6",...}
11     ▶ actions: {playback: {eab: "EAB::9b2dd699-11ec-4464-b973-122b59311637::61117927::26004819",...}, browse:
12       device_context_failure: false
13     ▼ entity_metadata: {genre_names: ["Medical", "Drama", "Romance", "Action"], premiere_date: "2018-05-15T
14       ▶ genre_names: ["Medical", "Drama", "Romance", "Action"]
15       premiere_date: "2018-05-15T00:00:00Z"
16       ▶ rating: {code: "TV14"}
17       series_description: "Executive producer Dick Wolf delivers the newest installment of the compelling
18       id: "2b4f6451-b084-450a-a6d7-f116ecc85af6"
19     ▼ metrics_info: {reco_tags: "ncr|nr|uf", entity_id: "2b4f6451-b084-450a-a6d7-f116ecc85af6", entity_type
20       entity_id: "2b4f6451-b084-450a-a6d7-f116ecc85af6"
21       entity_name: "Chicago Med"
22       entity_type: "series"
23       promo_text_format: "Start Watching"
24       reco_reasons: "For Fans of The Good Doctor"
25       reco_tags: "ncr|nr|uf"
26       target_id: "2b4f6451-b084-450a-a6d7-f116ecc85af6"
27       target_name: "Chicago Med"
28       target_type: "series"
     ▶ personalization: {bowie_context: "cover_story", eab: "EAB::9b2dd699-11ec-4464-b973-122b59311637::6111
       view_template: "cover_story_standard"
     ▶ visuals: {artwork: {_type: "artwork_orientation",...}, headline: "Chicago Med", action_text: "Start Wat
       _type: "view"

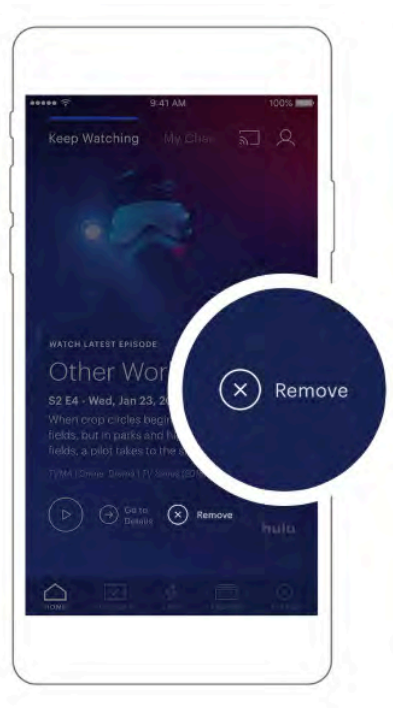
```

14 **Source:** Screenshot of Chrome Developer Tools showing the file containing data that supports
15 the user's experience from Hulu.com.

16
17 32. The Accused Infringing Devices automatically and periodically access
18 each of the feeds to identify each of the corresponding second collection of
19 presentations using the computer system. In particular, Hulu's catalog of TV shows
20 and movies is constantly changing. <https://www.hulu.com/press/new-this-month/>.

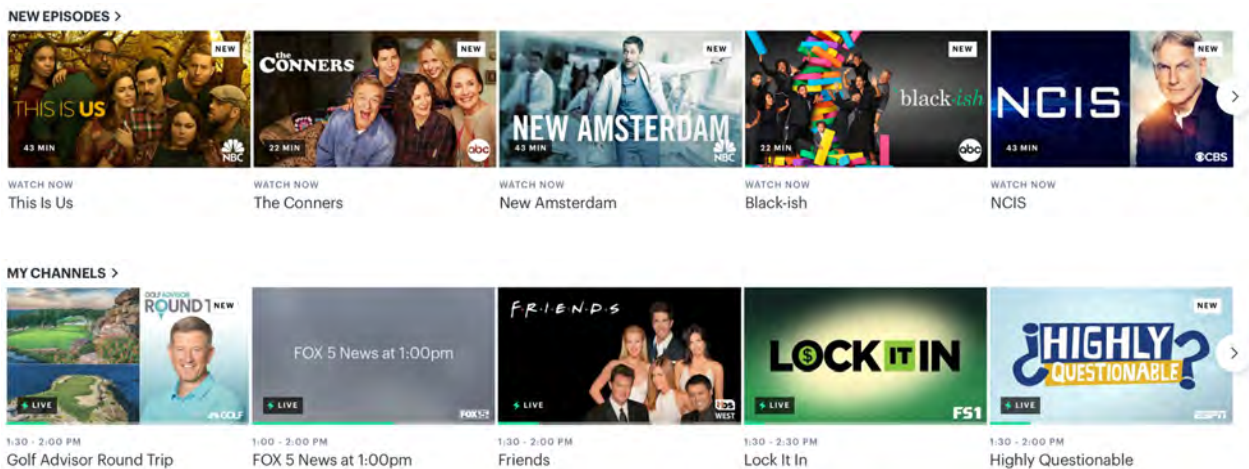
21 33. The Accused Infringing Devices also provide a recommendations
22 engine that automatically and periodically provides updated recommendations.

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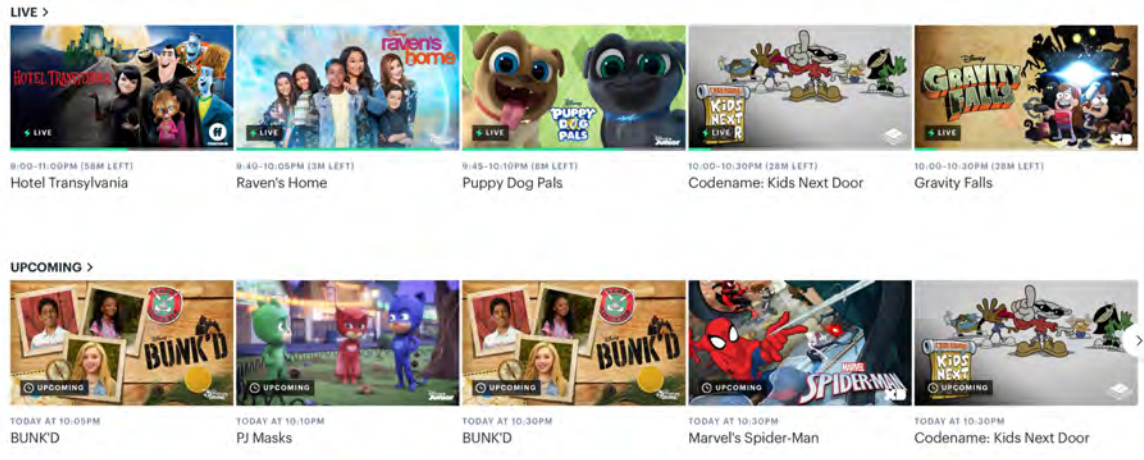
Source: <https://www.hulu.com/press/hulu-update/mobile-features-and-your-new-web/>

34. The Accused Infringing Devices store data associated with a third collection of one or more presentations. In particular, the Accused Infringing Devices display additional rows, each corresponding to a separate collection of presentations. For example, on the Hulu homepage, Hulu stores data associated with “New Episodes” and “My Channels.”



Source: <https://hulu.com>

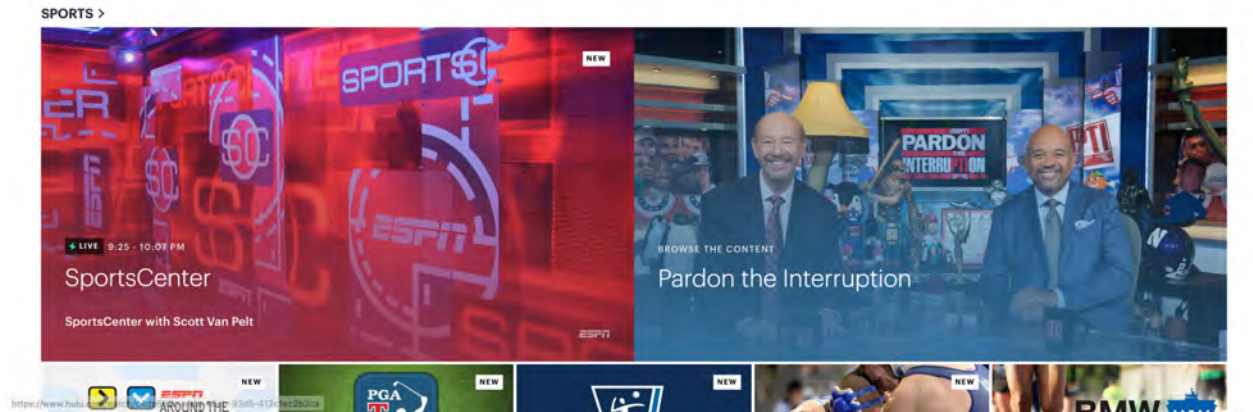
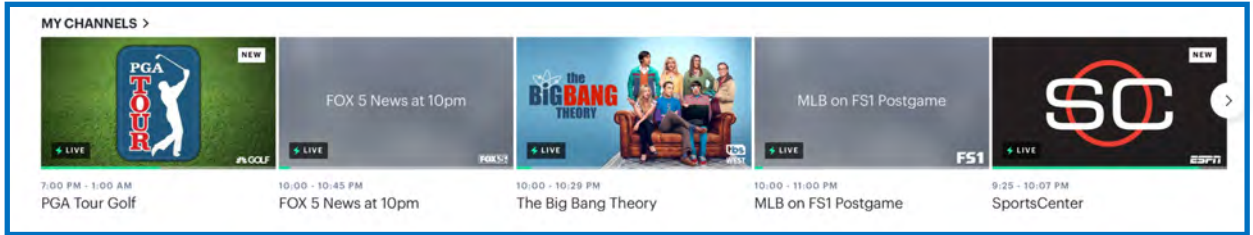
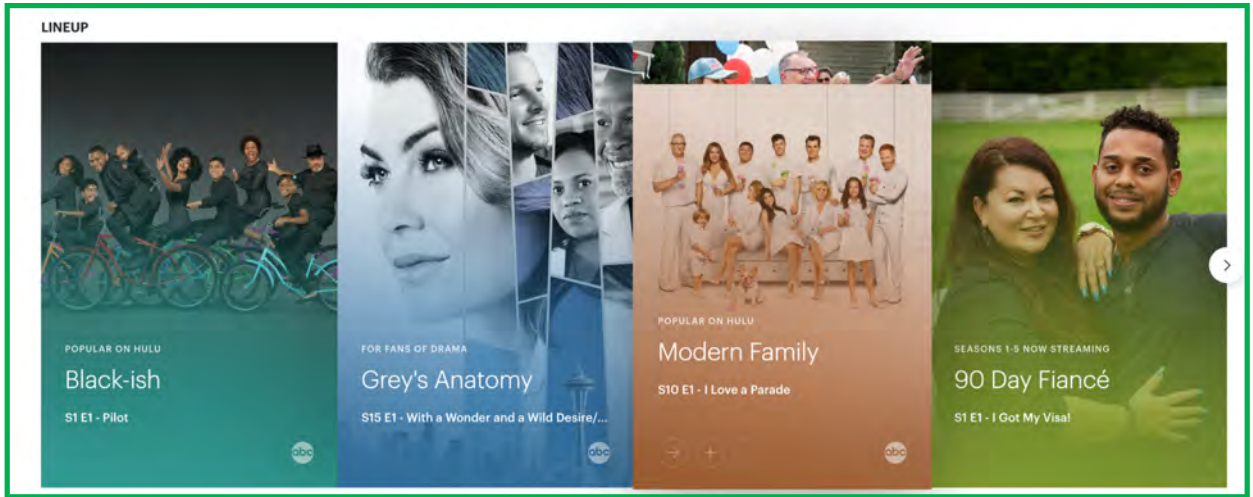
1
2 35. In addition on the browse category pages, the Accused Infringing
3 Devices store data associated with collections of “Live” and “Upcoming” TV
4 shows.



13 Source: <https://hulu.com>

14
15 36. The Accused Infringing Devices aggregate the first, second, and third
16 collections of presentations for delivery via the computer network using a common
17 web page. Both the Hulu.com homepage and browse category pages include rows
18 corresponding to first (in the red box), second (in the green box), and third (in the
19 blue box) collections of presentations.

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Source: <https://hulu.com>

Kids

FOR YOU >



KEEP WATCHING >



LIVE >



UPCOMING >



MOVIES >



Source: <https://hulu.com>

1 37. Hulu has infringed, and continues to infringe, at least claim 1 of the
2 '273 patent in the United States, by making, using, offering for sale, selling and/or
3 importing the Accused Infringing Devices in violation of 35 U.S.C. § 271(a).

4 38. Upon information and belief, Hulu may have infringed and continues
5 to infringe the '273 patent through other software and devices utilizing the same or
6 reasonably similar functionality, including other versions of the Accused Infringing
7 Devices.

8 39. Hulu's acts of direct infringement have caused and continue to cause
9 damage to Uniloc and Uniloc is entitled to recover damages sustained as a result of
10 Hulu's wrongful acts in an amount subject to proof at trial.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, plaintiff Uniloc 2017 LLC respectfully prays that the Court
13 enter judgment in its favor and against Hulu as follows:

- 14 a. A judgment that Hulu has infringed one or more claims of the
15 '273 Patent literally and/or under the doctrine of equivalents;
- 16 b. That this Court award Uniloc its damages pursuant to 35 U.S.C.
17 § 284 and any royalties determined to be appropriate;
- 18 c. That this be determined to be an exceptional case under 35
19 U.S.C. § 285 and that Uniloc be awarded enhanced damages up to treble damages
20 for willful infringement as provided by 35 U.S.C. § 284;
- 21 d. That this Court award Uniloc prejudgment and post-judgment
22 interest on its damages;
- 23 e. That Uniloc be granted its reasonable attorneys' fees in this
24 action;
- 25 f. That this Court award Uniloc its costs; and
- 26 g. That this Court award Uniloc such other and further relief as the
27 Court deems proper.
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DEMAND FOR JURY TRIAL

Uniloc hereby demands trial by jury on all issues so triable pursuant to Fed. R. Civ. P. 38.

Dated: October 21, 2019

FEINBERG DAY KRAMERALBERTI LIM
TONKOVICH & BELLOLI LLP

By: /s/ M. Elizabeth Day

M. Elizabeth Day

Attorneys for Plaintiff
Uniloc 2017 LLC