

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ALPHASENSE, OY and ALPHASENSE, INC.,

Plaintiffs,

v.

SENTIEO, INC.,

Defendant.

C. A. No.

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs AlphaSense Oy and AlphaSense, Inc. (collectively, “AlphaSense”), by and through their undersigned counsel, hereby file the following Complaint against Defendant Sentieo, Inc. (“Sentieo” or “Defendant”) and allege as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement of U.S. Patent No. 11,023,675 (“the ’675 Patent”) arising under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

2. In 2010, Plaintiff AlphaSense launched the AlphaSense Platform, an innovative, award-winning search engine that, among other things, utilizes natural language processing and an innovative user interface to enable its users to rapidly and reliably find relevant information within financial documents (the “AS Platform”). Prior to launching the AS Platform, in 2009, AlphaSense filed an application for a United States Patent to protect the innovations utilized by the AS Platform. AlphaSense’s patent application issued on June 1, 2021 as the ’675 Patent.

3. Until 2015, the AS Platform was the lone search platform of its kind. In 2015, Defendant Sentieo entered the market with a search platform (the “Sentieo Platform”) that had remarkable similarity to the AS Platform in too many ways to be mere coincidence. The Sentieo Platform infringes AlphaSense’s ’675 Patent, thereby causing irreparable harm to AlphaSense, and

will continue to do so unless this Court intervenes. AlphaSense therefore respectfully seeks, among other things, injunctive relief prohibiting Sentieo from infringing AlphaSense's '675 Patent and seeks the payment of damages, to the extent that such damages can be computed from Sentieo's acts of infringement.

THE PARTIES

4. Plaintiff AlphaSense Oy is a Finnish limited company with a principal place of business located at Itämerenkatu 3 00180, Helsinki, Finland. Plaintiff AlphaSense, Inc. is a California corporation with a principal place of business located at 24 Union Square East, 5th Floor, New York, NY 10003. AlphaSense conducts business through its website located at www.alphasense.com.

5. Upon information and belief, Defendant Sentieo, Inc. is a Delaware corporation with a principal place of business located at 315 Montgomery Street, 10th Floor, San Francisco, CA 94104.

6. On information and belief, Sentieo conducts business through its website located at www.sentieo.com.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Plaintiff AlphaSense Oy is the owner, by assignment, of the '675 Patent. Plaintiff AlphaSense Oy has granted Plaintiff AlphaSense, Inc. an exclusive license to the '675 Patent. Therefore, Plaintiffs AlphaSense Oy and AlphaSense, Inc. have standing to pursue the relief sought herein.

9. This Court has personal jurisdiction over Sentieo because Sentieo is incorporated in the state of Delaware.

10. Venue is proper in this District under 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b) because Sentio is incorporated in Delaware and therefore resides in Delaware. Moreover, Delaware is a convenient forum for resolution of the parties' disputes set forth herein. For instance, Sentio publishes "Terms of Service" for its infringing systems and services that include a forum selection clause for the State of Delaware:

These Terms of Service shall be governed and construed in accordance with the laws of the United States and the State of Delaware, without giving effect to conflicts-of-law principles thereof. You agree to submit to the personal jurisdiction of the state and federal courts located in the State of Delaware with respect to any legal proceedings that may arise in connection with the Service or from a dispute as to the interpretation or breach of these Terms of Service.

Ex. B, Printout of Terms of Service, sentio.com/terms-of-service.

BACKGROUND

A. AlphaSense's AS Platform

11. AlphaSense provides the AS Platform, a software platform providing an innovative, award-winning search engine that allows users to search through financial documents, *e.g.*, SEC or other regulatory filings and transcripts of investor calls, for specific information that matches the users' queries and/or matches terms that are synonymous with the terms in the user's query. AlphaSense owns and operates the website www.alpha-sense.com to promote the AS Platform.

12. AlphaSense designed the AS Platform, including the search results, with a unique graphical user interface that allows users to search for and identify key data points and insights on virtually any company or industry. By using the AS Platform, subscribers efficiently find and access critical financial information in filings, transcripts, presentations, news, and research. Today, more than 1600 firms and their employees rely on AlphaSense and the AS Platform, including investment managers, global banks, research firms, consultancies, and corporations.

13. The search engine at the heart of the AS Platform aggregates thousands of disparate sources in one location, intelligently indexes these sources, and provides users unparalleled search capabilities through its patented technology. Additionally, the AlphaSense search engine provides a feature branded as Smart Synonyms® that automatically expands user keyword searches to capture alternative words and terms for thousands of financial and business terms, while filtering out false positives, to capture the information the user seeks.

14. AlphaSense invested substantial resources in developing, refining, and optimizing the AS Platform since the company's founding in 2008 and the AS Platform launch in 2010. Because AlphaSense's business relies on the search engine and user interface available on the AS Platform, AlphaSense devoted significant time and effort to create a distinct, novel, and valuable graphical user interface and a powerful, purpose-built financial search engine to attract and retain customers.

15. AlphaSense is recognized as a market leader and innovator for its groundbreaking search technology. For example, AlphaSense was recently named "Best Financial Research and Data Company" for the second straight year by FinTech Breakthrough Awards. Ex. C; Ex. D.

16. Similarly, G2 (a website that focuses on reviewing business software) recently recognized AlphaSense's AS Platform as the premier platform for financial research based on reviews from financial research analysts, chief investment officers, IR directors, competitive intelligence managers, and other individuals with knowledge of the AS Platform. Ex. E. Moreover, AlphaSense itself was awarded the title of distinguished leader in the fields of financial research, market intelligence, market intelligence enterprise, and media monitoring. Ex. E.

17. In 2019, Frost & Sullivan, a renowned consulting firm that annually presents best practices awards recognizing companies for outstanding achievement or superior performance,

awarded AlphaSense its “Technology Innovation Award.” In so doing, Frost & Sullivan, credited AlphaSense with solving the automated search industry’s “qualitative data problem.” Ex. F at 3. Prior to AlphaSense’s AS Platform, it was well known that, “[w]hile all business enterprises have unique needs, most share the common challenge of managing large amounts of structured and unstructured data. The lack of comprehensive automated data search systems and the inability to extract highly relevant content based on users’ queries have remained chief concerns for enterprises worldwide.” Ex. F at 3. To address these challenges, AlphaSense “introduced an AI-powered search technology platform” that “leverages machine learning and natural language processing (NLP) technology to automate the classification and extraction of unstructured data from a mix of varied sources, such as public documents, internal documents, brokerage research, trade journals, and news publications.” Ex. F at 3. The AS Platform “focuses on the needs particular to knowledge professionals, thus creating a semantic search engine that empowers them to find critical information efficiently instead of working manually to painstakingly connect those data points.” Ex. F at 4. And, among other features evidencing AlphaSense’s “visionary innovation,” Frost & Sullivan highlighted that the AS Platform “searches not only the exact search term supplied by the user, but also synonyms tied to the business or financial subject matter” and thus “enables comprehensive synonym recognition for themes, keywords, and complex terms that do not form part of standard nomenclature.” Ex. F at 4.

18. The AS Platform may only be accessed by authorized users and under terms of service that prohibit disclosure, copying or distribution of information available through the AS Platform to persons not authorized to view such information.

B. AlphaSense’s ’675 Patent

19. On June 1, 2021, the United States Patent and Trademark Office issued the ’675 Patent, entitled “User Interface for Use with a Search Engine for Searching Financial Related

Documents.” A true and correct copy of the ’675 Patent is attached hereto as Ex. A and incorporated herein by reference.

20. The ’675 Patent, as embodied by the claims, provides novel, non-obvious methods and systems for efficiently searching a voluminous number of financial documents primarily for publicly traded companies using keyword and synonym proximity searching. The claimed methods and systems produce an easy-to-use interface that enables the user to: (1) select a matching document to quickly view complete sentence snippets within the document that have the matching search keywords or synonyms; and (2) select a displayed snippet to allow the user to view the snippet as it appears within the document and with its surrounding text. This allows the user to quickly find and scan through important concepts in a large number of financial related documents without the need for extensive manual research and without missing the user’s desired documents.

21. The ’675 Patent claims technical solutions to problems that arise in the development and implementation of search engines for financial documents. For example, the ’675 Patent identifies a number of technical drawbacks of prior art systems, including, for example:

Conventional web search engines return links to entire documents in response to a search query consisting of keywords or phrases given by the user. In the financial domain, the end user is often a financial analyst who is researching the information source and looking for specific textual information within a specific contextual topic. Text search software is able to find specific keywords, but typically misses the many synonyms and alternative expressions that the user was not able to think about, or does not have time to go through one by one. For example, “sales growth” as a topic could be expressed as “revenue expansion”, “increasing customer demand” or any number of tens or even hundreds of combinations of synonyms, with phrases broken up within a sentence or across multiple sentences. Searching for each of those terms or all of those terms at once is not practical, as it would take a lot of time, would require referral to synonyms and may not return some or most of the actual sentences or paragraphs that one seeks. Traditional search engines can therefore either miss the relevant and important items of interest, or bring too many documents that contain the same keywords but in the wrong context, in effect rendering the search useless. Also, financial analysts are often evaluating whether

the text expressions are positive or negative for the company's stock price, but traditional search engines do not allow the analyst to search for text that is either positive or negative from the perspective of the price of the company's stock. In addition, the analyst would like to know if the statement was made earlier, is a recurring statement and if it refers to an event in the future.

Thus, it is desirable to provide a method and a system for efficiently conducting contextual, uniqueness or recurring, tense and sentiment-aware deep search within a document, and it is to this end that the disclosure is directed.

Ex. A at 1:13–46.

22. The claims of the '675 Patent are directed to patent-eligible, non-abstract ideas, as the claims are directed to technical solutions to overcome at least the problems identified above. For example, the claimed systems and methods enhance the process for searching for financial documents, reviewing search results, and accessing documents of interest. Ex. A at 14:15 – 16:61. As a result, the '675 Patent claims inventive concepts that are significantly more than a patent-ineligible, abstract idea. This was confirmed by the Examiner during prosecution of the application that would issue as the '675 Patent. Ex. G.

23. The '675 Patent covers important innovations that have made the AlphaSense Platform successful. From June 1, 2021 to the present, AlphaSense, when operating its AS Platform to perform searches for its users, practices at least claim 1 of the '675 Patent in the United States.

C. The Accused Sentio Platform

24. Approximately five years after AlphaSense launched its AS Platform, Sentio launched a “research platform that arms financial analysts with new ways to quickly search, visualize, and interpret data allowing them to do deeper, faster research, spot business inflections earlier, and generate better returns.” Ex. H, <https://sentio.com/news/fintech-innovator-sentio-launches-game-changing-data-search-technology/> (last accessed June 18, 2021). As shown below, the search user interface and presentation of search results of the Sentio Platform (launched in

2015) are strikingly similar to the search user interface and presentation of search results of the AS Platform (launched in 2010):

Sentio Platform:

The screenshot shows the Sentio Platform interface. On the left, a sidebar lists search results for 'GLNG' with various document titles and hit counts. The main area displays a transcript snippet from a Q4 2015 earnings call. The transcript text includes:

1) loss of \$143 million. Turning over now to page 7 to look at the balance sheet. I think the balance sheet movements for the quarter can be summarized really in three points. One is regarding the cash movement, which was particularly affected by the posting of \$305 million with respect to Perenco to the Cameroon FLNG, and of course we announced the Tundra, the potential sale of that to Golar Energy

2) million letter of credit that we submitted to Cameroon FLNG project. Since then the \$305 million is being decreased to \$180 million. The \$280 million is split into two tranches. One regarding the short term, \$100 million of that is regarded as short-term, and the other one, \$180 million, is regarded as long term. And this is why you see a restricted cash in the second red box there of \$180 million

3) letter of credit to our Cameroon FLNG counterparts. This was subsequently reduced to \$280 million, but nevertheless had an overall impact on our liquidity during the fourth quarter. However, that was particularly partly mitigated by the release of \$260 million during that quarter, consisting of \$100 million of cash from Golar LNG Partners in respect of the Eskimo vendor loan, the release of \$50

4) get closer to completion of GoFLNG Hilli conversion we can talk more about other FLNG opportunities we allude to in the press release. The stock value will improve and therefore the bonds will be trading in the money. Nevertheless, we're already looking at a variety of options that will deal with this. We talk about the financial -- talking to financial institutions about extending the term of

5) discussions on acceleration of a second FLNG vessel for Fortuna. The resource size in Equatorial Guinea is sufficient to support two GoFLNG vessels. With the [illegible] brought to the project by

AS Platform:

The screenshot shows the AS Platform interface. On the left, a sidebar lists search results for 'Q4 2015 Earnings Call' with various document titles and hit counts. The main area displays a transcript snippet from a Q4 2015 earnings call. The transcript text includes:

that is again notable in our fourth quarter results. So in Q3, we had net financial expenses of approximately \$126.5 million and in Q4, that's reduced to \$36.2 million. In both cases, biggest variable in there is with regards the mark-to-market of our total return swaps.

In 3Q, we posted net financial expenses regarding the total return swaps of approximately \$68 million. In Q4, albeit it's dropped, it's still a material amount of approximately \$36 million. These losses, particularly in Q4, were mitigated by mark-to-market gains on interest rate swaps of \$16 million, as short to medium term rates improved at the end of December.

Also included in our net financial expenses/income is net interest expense of approximately \$9.2 million. All of that has resulted to net loss for the quarter of \$59.9 million against Q3's loss of \$143 million.

Turning over now to page 7 to look at the balance sheet. I think the balance sheet movements for the quarter can be summarized really in three points. One is regarding the cash movement, which is particularly affected by the posting of \$305 million with respect to the Perenco to the Cameroon FLNG LLC, and of course we announced the Tundra, the potential sale of that to Golar LNG Partners and looking to conclude that in March, and the ongoing Hilli conversion program.

So going to the first point regarding the drop in cash, as you can see there, cash dropped from \$222 million from 30th of September to \$105 million at the end of December. As already alluded to, the biggest variable that's contributed to that is the posting of \$305 million to procure the issuance of \$400 million letter of credit that we submitted to the Cameroon FLNG project. Since then, the \$305 has been decreased to \$280 million. The \$280 million is split into two tranches. One is regarded as short term, \$100 million of that is regarded as short term and the other \$180 million is regarded as long term and this is why you see a restricted cash in the second red box there of \$180 million there as of December 2015.

You also see material increase in other current assets in the first box. The main reason for that is, as we announced the sale of the Tundra to Golar LNG Partners in February, we had to treat that vessel as a current asset. And as a result, both the value of the asset and also the value of the loan pertaining to that asset are both treated as short term.

On the third box, you will have seen an increase in our expenditure with regard to assets under development from \$435 million at the end of September to now \$501 million at the end of December. And as Gary alluded to earlier, now that we have triggered the amount at which we can start drawing down on the facility, the Hilli and that all sort of points towards the Hilli conversion -- the Hilli conversion and its progress going forward is now fully funded.

Turning over to page 8, there isn't really anything new to say in here. I think the vast majority of the variances that has been highlighted there is pretty much explained in the previous page. So instead, I will go straight to page 9 to look at our liquidity review.

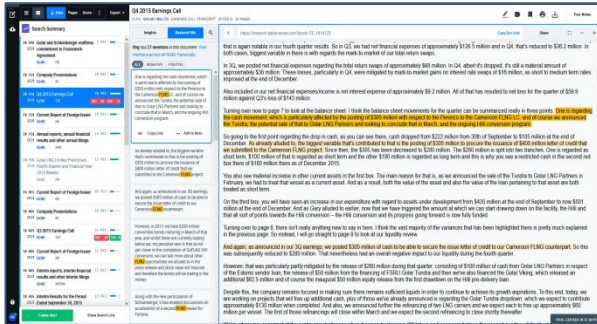
And again, as announced in our 3Q earnings, we posted \$305 million of cash to be able to secure the issue letter of credit to our Cameroon FLNG counterpart. So this was subsequently reduced to \$280 million. That nevertheless had an overall negative impact to our liquidity during the fourth quarter.

However, that was particularly partly mitigated by the release of \$260 million during that quarter, consisting of \$100 million of cash from Golar LNG Partners in respect of the Eskimo vendor loan, the release of \$50 million from the financing of FSRU Golar Tundra and then we've also financed the Golar Viking, which released an additional \$62.5 million and of course the inaugural \$50 million equity release from the first drawdown on the Hilli pre-delivery loan.

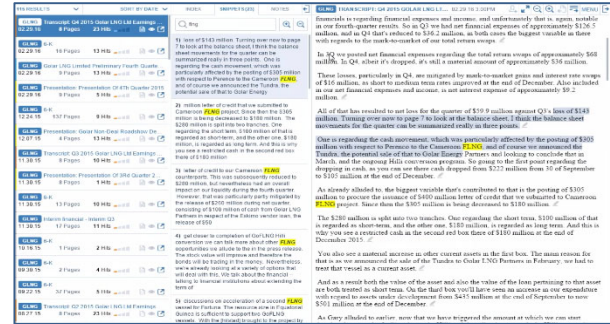
Despite this, the company remains focused in making sure there remains sufficient liquids in order to continue to achieve its growth aspirations. To this end, today, we are working on projects that will free up additional cash, plus of those we've already announced is regarding the Golar Tundra dropdown, which we expect to contribute approximately \$130 million when completed. And also, we announced further the refinancing of two LNG carriers and we expect each to free up approximately \$60 million per vessel. The first of those refinancings will close within March and we expect the second refinancing to close shortly thereafter.

25. Although document search results can be presented in many different ways, Sentieo chose to build its user interface to present its search results in a substantially similar way to that of the AS Platform, as shown below:

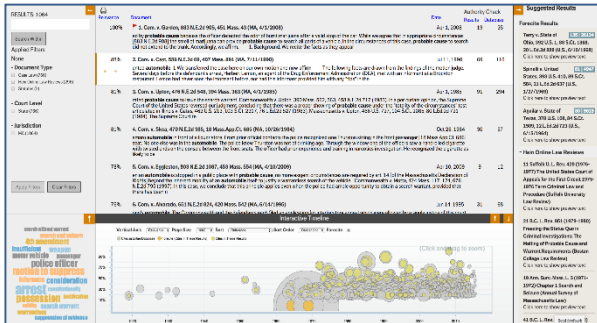
A - AlphaSense



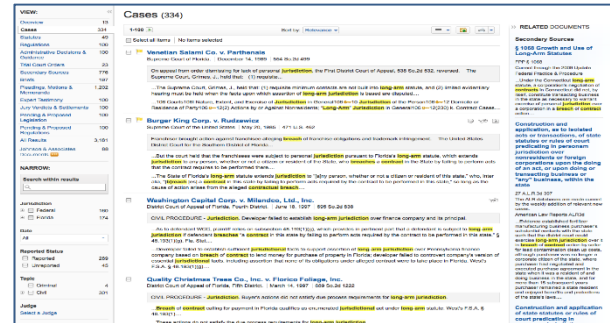
B - Sentieo



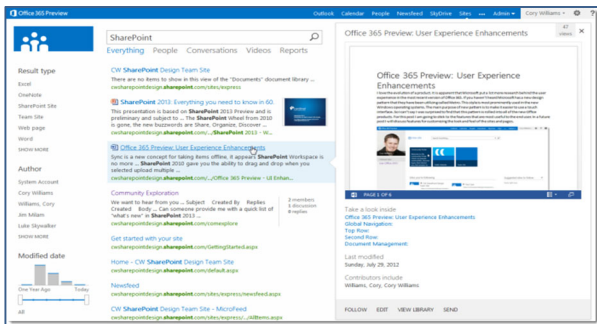
C - Fastcase



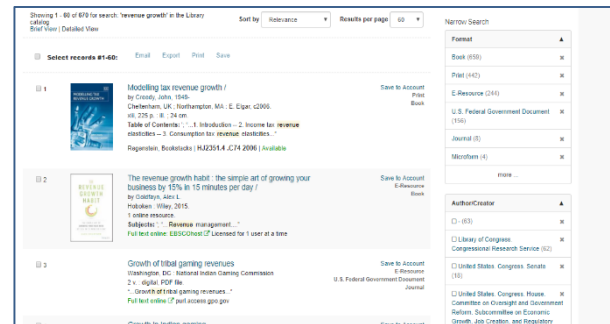
D - Westlaw

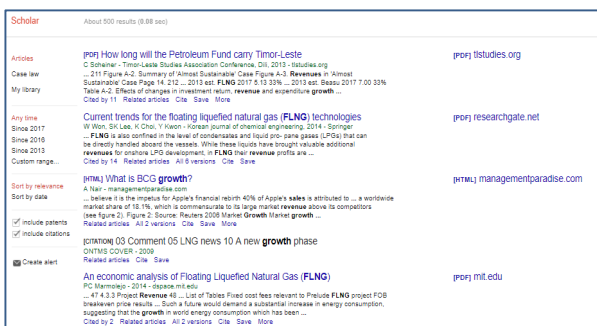
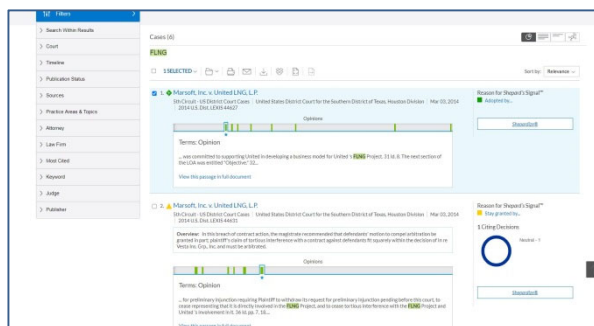


E - Office 365/Sharepoint



F - University of Chicago Library



G - Google Scholar**H - LexisNexis**

26. Further, the Sentieo Platform utilizes, among other things, functionality with substantial similarity to AlphaSense’s “Smart Synonyms” functionality that is a key feature of AlphaSense’s AS Platform. Sentieo refers to “Smart Synonyms” in its own webpage (despite the fact that, in 2017, AlphaSense obtained a trademark registration from the USPTO for the term “Smart Synonyms®”):

This is the meat 'n potatoes of 10K Wizard. Sentieo allows you to quickly search through all electronically filed SEC filings and EDGAR archives, and the Smart Synonyms and Smart Filters functionality helps you drill down to exactly what you are looking for fast. And yes, you can do this on all your mobile devices too.

See Ex. I, <https://sentieo.com/sentieo-the-gandalf-of-document-search-wizards/>) (last accessed June 30, 2021).

27. Furthermore, in March 2015, approximately five years after AlphaSense launched the AS Platform, Sentieo included synonym lists in the Sentieo Platform that had striking similarity to AlphaSense’s synonym list available at the time, including typographical errors, order of terms listed, and other idiosyncrasies. Exemplary screenshots (taken on March 26, 2015) comparing the AlphaSense synonym lists to the Sentieo synonym lists are reproduced side-by-side below.

AlphaSense**Sentio****A – Inventory****+ Includes terms like**

inventory
 stock keeping units (SKU)
 stock piles
 restock
 raw materials
 work-in-progress
 finished goods
 feedstock
 first in first out (FIFO)
 last in first out (LIFO)

Included Synonyms

inventory	stock keeping units
sku	stock piles
restock	raw materials
work-in-progress	finished goods
feedstock	first in first out
fifo	last in first out
lifo	

B – Seasonality**+ Includes terms like**

seasonal
 seasonality
 spring
 summer
 autumn
 winter
 weather
 back-end loaded
 quarterly fluctuation
 season

Included Synonyms

seasonal	seasonality
spring	summer
autumn	winter
weather	back-end loaded
quarterly fluctuation	season

C – Europe**+ Includes terms like**

Europe & continental references
 European countries
 European nationalities
 European currencies and symbols
 European cities
 Europe, Middle East and Africa (EMEA)
 European Union (EU)
 Eastern Europe Middle East and Africa (EEMA)
 Britain
 Eurozone / Euro zone

Included Synonyms

europe & continental references	european countries european nationalities
european currencies	european symbols
european cities	europe
middle east and africa	emea
european union	eastern europe middle east and africa
eema	britain
eurozone	euro zone

AlphaSense**Sentio****D – China**

+ Includes terms like
China or PRC
Chinese
Taiwan
Taiwanese
Chinese currency and symbols
Chinese cities and provinces
BRICs
Sino

<u>Included Synonyms</u>	
china	prc
chinese	taiwan
taiwanese	chinese currency
chinese symbols	chinese cities
chinese provinces	sino

E – Revenue

+ Includes terms like
revenue
sales
top-line
turnover
business grew/declined (+ other descriptives)
we oversold
undersold
buy and bill
selling rooms
impact to billings

<u>Included Synonyms</u>	
sale	revenue
sales	top-line
turnover	we oversold
undersold	buy and bill
selling rooms	impact to billings

28. As shown in the above examples, even typographical errors in AlphaSense’s synonym lists are reproduced verbatim in Sentio’s synonym lists. For example, for the term “inventory,” both AlphaSense and Sentio include the term “stock piles,” which is a misspelling of the word “stockpiles.” Further, AlphaSense’s synonym list for “Europe” includes a single country: “Britain.” Likewise, Sentio’s synonym list for “Europe” identifies a single country: “Britain.” As another example, AlphaSense’s synonym list for “Revenue” lists a single pronoun: “we oversold.” Likewise, Sentio’s synonym list for “revenue” identifies a single pronoun: “we oversold.” As a final example, like AlphaSense’s synonym list, Sentio’s synonym list for “Seasonality” includes “quarterly fluctuation,” but it does not include a number of related terms,

such as monthly fluctuation, annual fluctuation, or even seasonal fluctuation. Similarly, Sentieo's synonym list for "Seasonality" includes only "quarterly fluctuation" and not any of the aforementioned related terms.

D. Sentieo's Access to the AS Platform

29. Access to and use of the secure portion of the AS Platform, located at <https://research.alpha-sense.com>, was and continues to be subject to the contractual agreement set forth in AlphaSense's Terms of Use. This document was (and an updated version of it still is) publicly available. (See, <http://web.archive.org/web/20150411070214/https://www.alpha-sense.com/terms/>).

30. As a precondition for use of AlphaSense's AS Platform, individuals must accept that AlphaSense's "Terms of Use constitute a binding agreement between [the individual] and AlphaSense." <http://web.archive.org/web/20150411070214/https://www.alpha-sense.com/terms/>. Moreover, the individuals accessing the AS Platform must "acknowledge that, as between AlphaSense and [the individual accessing the AS Platform], all right, title and interest in any AlphaSense Content, this Website and any other AlphaSense materials furnished or made available as part of the Website, and all modifications and enhancements thereof, including, without limitation, all rights under copyright and patent and other intellectual property rights, belong to and are retained solely by AlphaSense or AlphaSense's licensors and providers, as applicable." *Id.*

31. Upon information and belief individuals employed or contracted by Sentieo (or individuals shortly before their employment with Sentieo) have accessed the AS Platform, and Sentieo has used the information gained by accessing the AS Platform in developing its Sentieo Platform.

COUNT I

(Infringement of the '675 Patent)

32. All preceding paragraphs are incorporated by reference as if fully restated herein.

33. Continuously since 2015 to the present, Sentio has deployed, owned, maintained, operated, and used a software platform for the financial services industry, which is accessible through Sentio's website at www.sentio.com and Sentio's web portal at <https://user-app.sentio.com/>. The Sentio Platform is configured to, and has been used to, provide search results that infringe at least one claim in AlphaSense's '675 Patent.

34. The following demonstrates infringement by Sentio of claim 1 of the '675 Patent, based on Sentio's activities as of June 1, 2021 and continuing through to the present.

35. The preamble of claim 1 of the '675 Patent states:

1. A method for rendering information from a database on a user interface of a remote computer, the method comprising:

36. From June 1, 2021 to the present, Sentio, through its Sentio Platform, has been conducting search queries on behalf of its customers and thus has been, and currently is, performing a method in the United States for rendering information from a database on a user interface of a remote computer, which comprises the acts described below.

37. The first step of the method of claim 1 requires:

receiving a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of financial documents,

38. From June 1, 2021 to the present, the Sentio Platform has been and is configured to receive a query from a user at the remote computer to search within a database, wherein the database comprises a plurality of financial documents.

Sentio's Financial and Corporate Research Platform brings together the previously disparate tools of financial document search, market and alternative data, and modeling and analytics, with a research management system.

Sentio's single, integrated platform enables competitive investors and corporations to rapidly discover insights so they can make smarter investments and execute winning strategies.



Ex. J Sentio Datasheet, *available at* <https://sentio.docsend.com/view/3df84tf> at 1.

39. The first step of the method of claim 1 further requires:

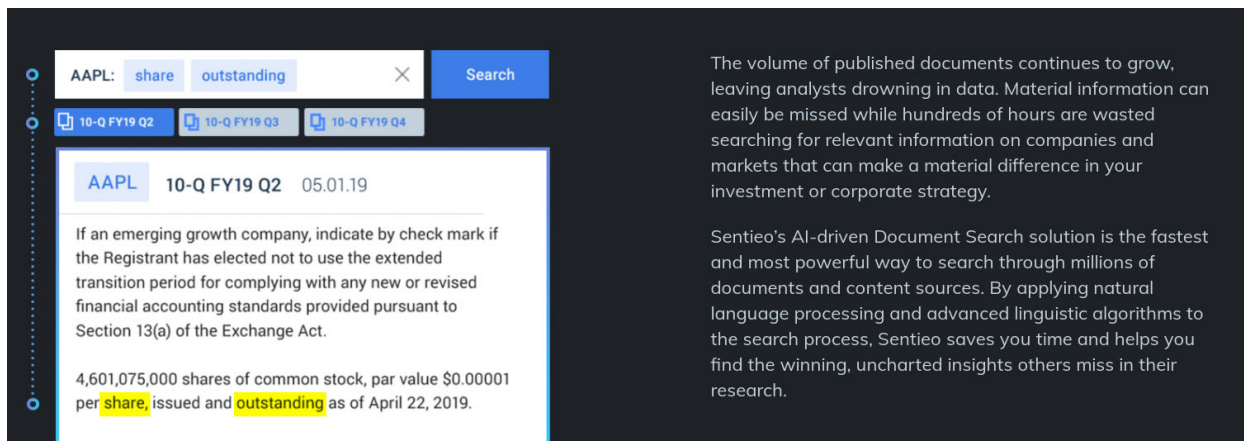
wherein the user query includes:

information identifying a publicly traded company;

a first keyword distinct from the publicly traded company; and

a second keyword distinct from the first keyword and the publicly traded company;

40. From June 1, 2021 to the present, the Sentio Platform has been and is configured to receive queries that include information identifying a publicly traded company, a first keyword distinct from the publicly traded company, and a second keyword distinct from the first keyword and the publicly traded company.



Ex. K, Sentio Document Search, *available at* <https://sentio.com/product/document-search/>.

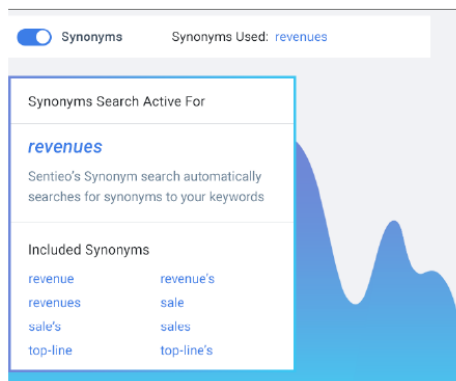
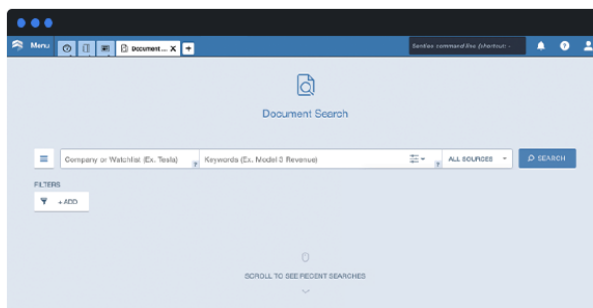
41. The second, third, and fourth steps of the method of claim 1 requires:
- determining a first similar topic for the first keyword;
 - determining a second similar topic for the second keyword;
 - executing a search based on the user query and the first similar topic and the second similar topic;

42. From June 1, 2021 to the present, the Sentieo Platform has been and is configured to determine a first similar topic for a first keyword and a second similar topic for a second keyword, and to execute a search based on the user query and the first similar topic and the second similar topic.

Insights You Need to Win

Sentieo's AI-driven Document Search solution is the fastest and most powerful way to search through millions of documents and content sources to find the uncharted insights others miss in their research.

- Use advanced query operators, filters, smart categories, and synonyms to eliminate time-wasting search results
- Search within specific document types, sections, or by role
- Conduct broad searches to uncover market signals and trends
- Compare filings over time with redlining, such as scanning MD&A sections for changes
- Get instant alerts when new documents or data are available for specific companies, watchlists, or saved search topics

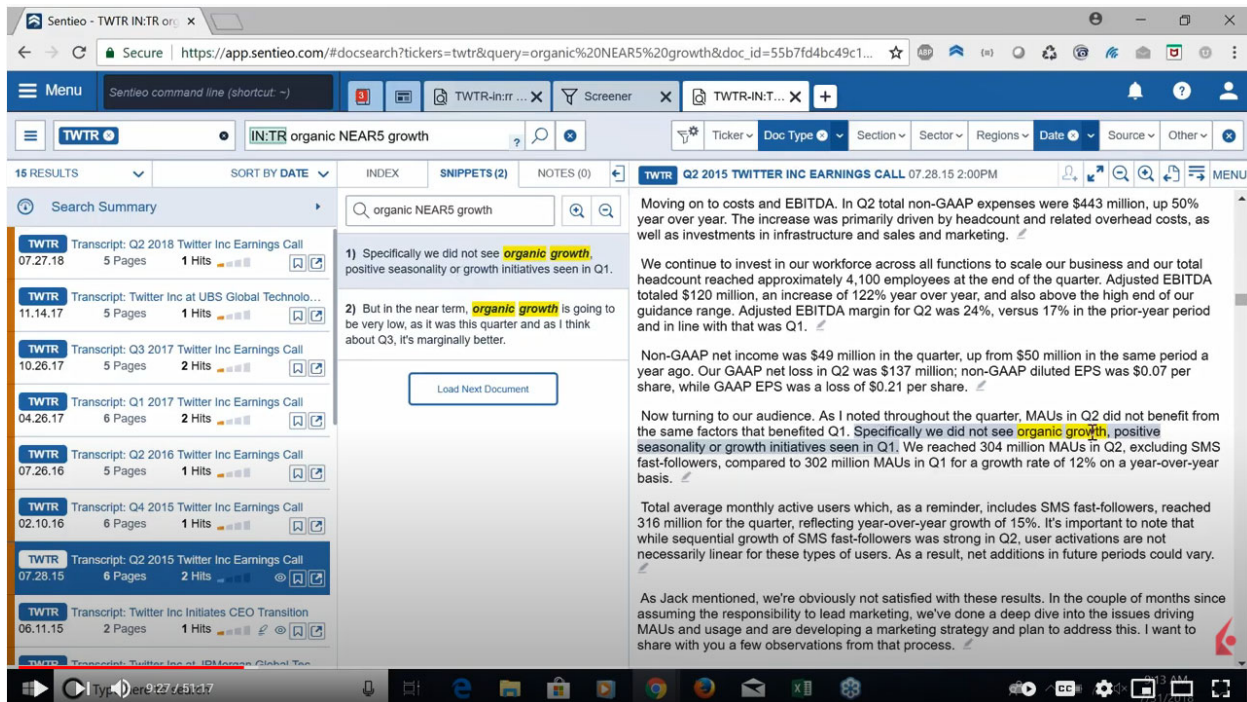


Ex. J Sentieo Datasheet, available at <https://sentieo.docsend.com/view/3df84tf> at 1.

43. The fifth step of the method of claim 1 requires:
- generating search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company in the query and that contain identified snippets of text from within the financial documents, wherein the identified snippets comprise a complete sentence,

wherein the snippet of text is identified when the first keyword or the first similar topic appears within a defined maximum distance from the second keyword or the second similar topic in a searched financial document including when the first similar topic appears within the defined maximum distance from the second similar topic in the searched financial document;

44. From June 1, 2021 to the present, the Sentieo Platform has been and is configured to generate search results in response to executing the search wherein the search results include financial documents associated with the publicly traded company in the query and that contain identified snippets of text from within the financial documents, wherein the identified snippets comprise a complete sentence, and wherein the snippet of text is identified when the first keyword or the first similar topic appears within a defined maximum distance from the second keyword or the second similar topic in a searched financial document including when the first similar topic appears within the defined maximum distance from the second similar topic in the searched financial document.



“Sentieo - How to Be More Productive in Your Fundamental Research Workflow,” *available at* <https://www.youtube.com/watch?v=ggDkHcUpVQ8> (last accessed June 18, 2021).

45. The sixth step of the method of claim 1 requires:

causing to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes:

a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document includes content provided by the publicly traded company;

a plurality of the identified snippets for selection by the user,

wherein the plurality of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents,

wherein the plurality of the identified snippets is from the user selected financial document;

text surrounding and containing a user selected snippet from the user selected financial document,

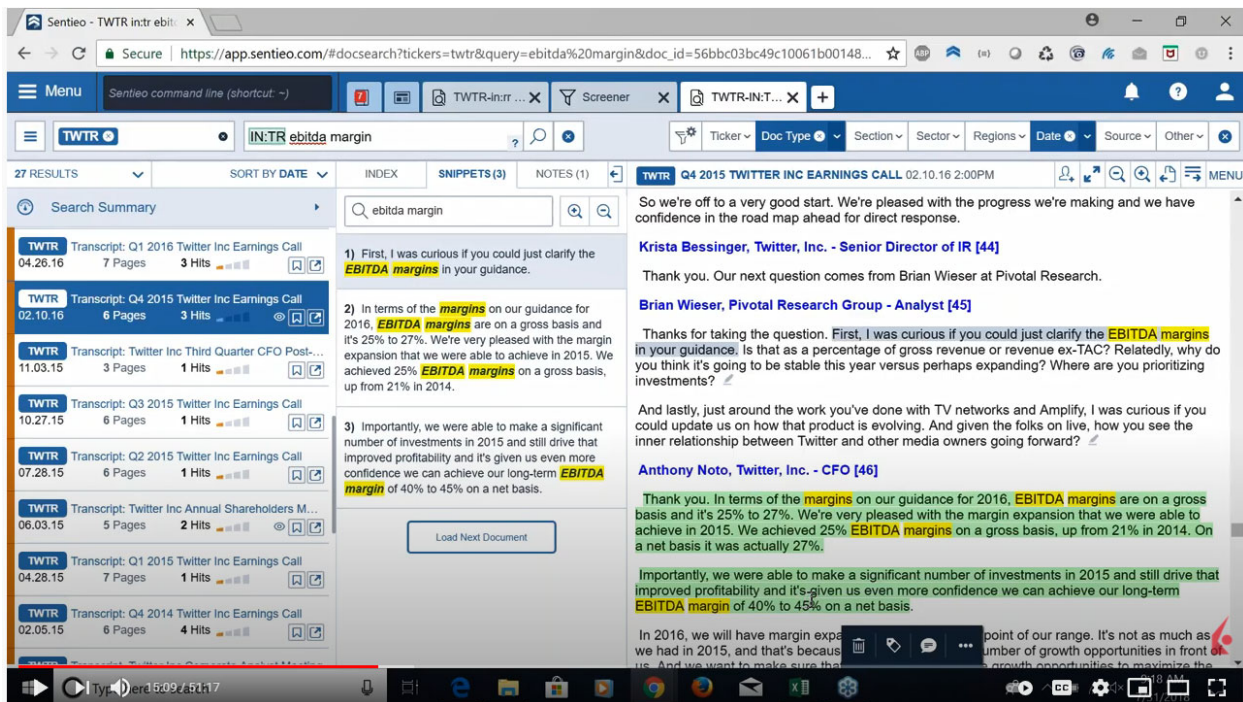
wherein at least a portion of the user selected snippet is automatically identified or automatically displayed differently on the user interface from the text surrounding the user selected snippet, wherein the text surrounding the user selected snippet is displayed in a same pane of the user interface with the at least a portion of the user selected snippet, wherein the text surrounding the user selected snippet is not identified as one of the plurality of the identified snippets,

wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet; and

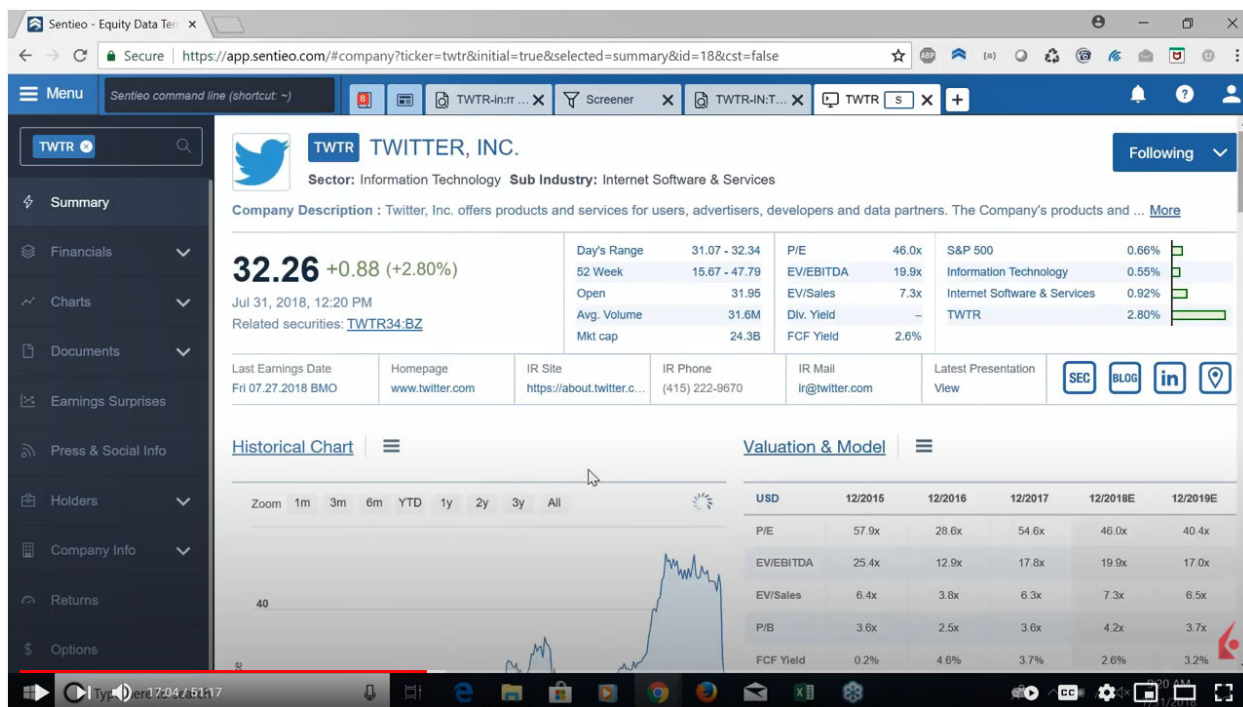
a stock ticker or a name of the publicly traded company.

46. From June 1, 2021 to the present, the Sentio Platform has been and is configured to cause to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes: a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document includes content provided by the publicly traded company; and a plurality of the identified snippets for selection by the user, wherein the plurality of the

identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents, wherein the plurality of the identified snippets is from the user selected financial document; and text surrounding and containing a user selected snippet from the user selected financial document, wherein at least a portion of the user selected snippet is automatically identified or automatically displayed differently on the user interface from the text surrounding the user selected snippet, wherein the text surrounding the user selected snippet is displayed in a same pane of the user interface with the at least a portion of the user selected snippet, wherein the text surrounding the user selected snippet is not identified as one of the plurality of the identified snippets, wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet; and a stock ticker or a name of the publicly traded company.



“Sentio - How to Be More Productive In Your Fundamental Research Workflow,” *available at* <https://www.youtube.com/watch?v=ggDkHcUpVQ8> (last accessed June 18, 2021).



“Sentio - How to Be More Productive In Your Fundamental Research Workflow,” *available at* <https://www.youtube.com/watch?v=ggDkHcUpVQ8> (last accessed June 18, 2021).

47. As a direct and proximate consequence of Sentio’s infringement of AlphaSense’s ’675 Patent, AlphaSense has suffered damages in an amount not yet determined for which AlphaSense is entitled to relief.

48. Unless restrained by the Court, Sentio will continue to infringe AlphaSense’s ’675 Patent and thereby cause irreparable harm to AlphaSense, because, among other things, Sentio’s infringement has forced AlphaSense to lower its prices in order to compete against Sentio’s infringing product. Moreover, there is a high likelihood that AlphaSense will prevail on the merits, the balance of hardships favors AlphaSense, and the public interest would not be harmed if the Court were to enjoin Sentio from infringing the ’675 Patent.

PRAYER FOR RELIEF

WHEREFORE, AlphaSense prays for judgment in its favor and against Sentio as follows:

- A.** Entry of judgment that the Sentieo has infringed one or more claims of the '675 Patent;
- B.** Entry of an order that preliminarily and/or permanently enjoins Sentieo and its representatives, assigns or successors, including any subsidiaries, parents, divisions, agents, servants, or employees thereof, and/or those in privity with Sentieo from infringing the claims of the '675 Patent;
- C.** To the extent calculable, an award of compensatory damages for AlphaSense as a result of Sentieo's patent infringement, as provided in 35 U.S.C. § 284, the extent of which will be determined at trial, but in no event less than a reasonable royalty, together with interest and costs; and
- D.** A determination that, pursuant to 35 U.S.C. § 285, this is an exceptional case and that AlphaSense be awarded its reasonable attorney's fees.

Dated: July 9, 2021.

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