UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

VIRTUAL CREATIVE ARTISTS, LLC, Plaintiff, v. **VALVE CORPORATION,** Defendant.	Case No. 2:24-CV-0749 COMPLAINT FOR PATENT INFRINGEMENT DEMAND FOR JURY TRIAL

Plaintiff Virtual Creative Artists, LLC files this Original Complaint for Patent Infringement against Valve Corporation, and would respectfully show the Court as follows:

I. NATURE OF THE LAWSUIT

1. This is an action for patent infringement under the Patent Laws of the United States, Title 35 United States Code ("U.S.C.") resulting from Valve Corporation infringing, in an illegal and unauthorized manner and without authorization and/or consent from Virtual Creative Artists, LLC, United States Patent No. 9,501,480 and 9,477,665 pursuant to 35 U.S.C. §271, and to recover damages, attorney's fees, and costs.

II. THE PARTIES

2. Plaintiff Virtual Creative Artists, LLC. ("VCA" or "Plaintiff") is a Delaware limited liability company, having business address at 338 Gracious Way, Henderson, NV 89011.

3. On information and belief, Defendant Valve Corporation ("Valve" or "Defendant") is a corporation organized and existing under the laws of Washington with a place of business at 10400 NE 4th St, Ste 1400, Bellevue, WA 98004. Defendant has a registered agent at Corpserve, Inc., 1001 4th Ave, Ste 4400, Seattle, WA, 98154.

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III. JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

5. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction, pursuant to due process and the Washington Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged herein. Furthermore, Defendant is subject to this Court's specific and general personal jurisdiction because Defendant is a Washington corporation.

6. Without limitation, on information and belief, within this State and this District, Defendant has used, sold, and/or offered for sale the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Washington and the Western District of Washington. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Washington and the Western District of Washington. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Washington and the Western District of Washington. Defendant has committed such purposeful acts and/or transactions in Washington and the Western District of Washington such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

7. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant is incorporated in Washington and the Western District of Washington. Under

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the patent laws, because Defendant is incorporated in Washington and the Western District of Washington, Washington and the Western District of Washington is the only district in which it resides. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case and has a business location within this District.

8. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

IV. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,501,480)

9. Plaintiff incorporates the above paragraphs herein by reference.

10. On November 22, 2016, United States Patent No. 9,501,480 ("the '480 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '480 Patent is titled "Revenue-Generating Electronic Multi-Media Exchange and Process of Operating Same." A true and correct copy of the '480 Patent is attached hereto as Exhibit A and incorporated herein by reference.

11. VCA is the assignee of all right, title, and interest in the '480 Patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '480 Patent. Accordingly, VCA possesses the exclusive right and standing to prosecute the present action for infringement of the '480 Patent by Defendant.

12. The invention relates to the field of creating and distributing media content, in particular, creating media content based upon submissions received on an electronic media exchange. At the time of the original invention in 1998, there was an Internet-centric problem that required a technical solution—how to develop a computer system that would allow remote contributors of electronic content to share and collaborate their content to develop new media

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content. The claimed invention, which predates modern crowdsourcing solutions, offers a unique, unconventional, and specially configured combination of "subsystems" in which to address the Internet-centric problem.

13. As set forth in the claims, the claimed invention has a collection of unconventional and particularly configured subsystems, including:

- "an electronic media submissions server subsystem,"
- "an electronic multimedia creator server subsystem,"
- "an electronic release subsystem,"
- "an electronic voting subsystem," and
- their corresponding specialized databases.

14. Each of these subsystems are configured in a very specific (and not generic), unconventional and non-routine manner to offer the novel and non-obvious claimed invention. For example, claim 1 requires an "electronic media submissions database," which is a subsystem that receives media submissions from Internet users. This is not a generic database but rather a scalable database that must be able to receive, store, and manage multiple petabytes of multimedia data received from users all over the world. This is one of the many specialized databased required in the claim. In fact, the specification discloses the use of a sophisticated database management system known in the art at the time that was capable of handling data at this level, Oracle7. This type of database management system cannot operate on a generic computing system but rather requires specialized hardware and software.

15. As another example, the claim requires a specifically configured "electronic media submission server subsystem." This subsystem is defined as specifically having:

- "one or more data processing apparatus,"

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- "an electronic media submission database stored on a non-transitory medium," and
- "a submissions electronic interface."

The "submissions electronic interface" is further specifically "configured" [1] "to receive electronic media submissions from a plurality of submitters over a public network, and [2] store the electronic media submissions in the electronic media submission database." Further, "the electronic media submissions database" in this subsystem is further required to "store[] [1] data identifying the submitter and [2] data indicating content for each electronic media submission." Collectively, the level of detail included in this very particular, well-defined, and unconventional subsystem makes clear that the claims include substantially more than the alleged abstract idea or merely performing an alleged abstract idea on a computer.

16. Similarly, the claim also requires a separate specifically configured "an electronic multimedia creator server subsystem." The claim specifically defines how this second subsystem interacts with other components including being "operatively coupled to the electronic media submissions server subsystem." The claim also specifically defines this subsystem as "having":

- "one or more data processing apparatus" and
- "an electronic creator multimedia database stored on a non-transitory medium."

17. This subsystem is also specifically "configured [1] to select and [2] retrieve a plurality of electronic media submissions from the electronic media submissions database using an electronic content filter located on the electronic multimedia creator server." The "filter" also includes a very specific algorithm of "being based at least in part on at least one of the one or more user attributes to develop multimedia content to be electronically available for viewing on user devices." Even more detail is provided by requiring "the identification of the submitter [be] maintained with each selected and retrieved submission within the multimedia content." Here

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again, collectively, the level of detail included in this very particular and well-defined and unconventional subsystem makes clear that the claims include substantially more than an alleged abstract idea or merely performing an alleged abstract idea on a computer.

18. The claim also includes "an electronic release subsystem," which is well defined and not conventional or routine. The claim defines how this subsystem is "operatively coupled to the electronic multimedia creator server subsystem." The claim also defines the components of this subsystem as having "one or more data processing apparatus" and being particularly "configured to make the multimedia content electronically available for viewing on one of more user devices." These details, collectively, also make this very particular and well-defined and unconventional subsystem substantially more than an abstract idea or performing an abstract idea on a computer.

19. The claim also requires "an electronic voting subsystem," which is well-defined, specific, and unconventional. This claimed subsystem has "one or more data processing apparatus" and is specifically "configured to enable a user to electronic vote for or electronically rate an electronically available multimedia content or an electronic media submission within a respective electronically available multimedia content."

20. Claim 1 is a specific and discrete implementation. For example, the claim requires an "electronic content filter" located at the server, remote from end users, and customizable based on user attributes. As another example, the "electronic voting subsystem" at the time of the invention was novel and inventive and added sufficient inventive contributions to avoid a risk of preempting creating and distributing media content. It is possible to create and distribute media content without ever having to include a "voting" subsystem on what components should be included in such media content. The detailed configuration "to enable a user to vote for or electronically rate an electronically available multimedia content or an electronic media

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submission within a respective electronically available multimedia content" has the level of particularity that avoids any risk of preemption.

21. Furthermore, the very particular and specifically configured "electronic media creator subsystem" not only provides a detailed and unique physical structure and interrelationship with other claimed components, but also includes a very specific configuration that is not conventional or routine. The claims make clear the interrelationship of the "electronic multimedia creator server subsystem" with respect to "the electronic media submission server subsystem" which must be "operatively coupled" thereto. The claims also provide detail on how the "electronic media creator subsystem" is "configured" "to select and retrieve a plurality of electronic media submissions from the electronic media submission database using an electronic filter." They also provide detail on how the "electronic filter" is "based at least in part on at least one of the one or more user attributes" and specifies that "the identification of the submitter is maintained with each selected and retrieved submission within the multimedia content."

22. These arguments overcame a patent eligibility rejection under 35 U.S.C. §101 of the claim at issue during the prosecution of the '480 patent.

23. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claim 1 of the '480 Patent in Washington, and elsewhere in the United States, by employing a computer-based system using https://store.steampowered.com/ ("Accused Instrumentality") (*e.g.*, https://store.steampowered.com/).

24. Valve uses a computer-based system for its Accused Instrumentality, to enable video game developers/publishers (submitters) to create developer/publisher pages, to publish video game titles, and to share multimedia content pertaining to the video game title (*e.g.*, image content, video content and textual content). Multimedia content pertaining to developer/publisher

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pages includes image and textual content (*e.g.*, a submitter's developer/publisher picture and an About section). The published video game titles include multimedia content including image, video and textual content (*e.g.*, a video game title name and video game title features and the like, and associated image content, video content and textual content) which may be shown to other users based on, *inter alia*, user attributes. Valve, during the relevant time period, took advantage of multiple cloud server providers for the Accused Instrumentality, as discussed above, as well as scalability within its cloud server providers, employing separate server subsystems for all its meaningfully different functions. Valve uses, and has used during the relevant time period, numerous different networks and providers for, *inter alia*, content management systems, web servers, web hosting, data centers, proxy certificates, SSL certificates, traffic analysis, advertising, and tagging, thereby using separate server subsystems for all its meaningfully different functions, such as those indicated below.

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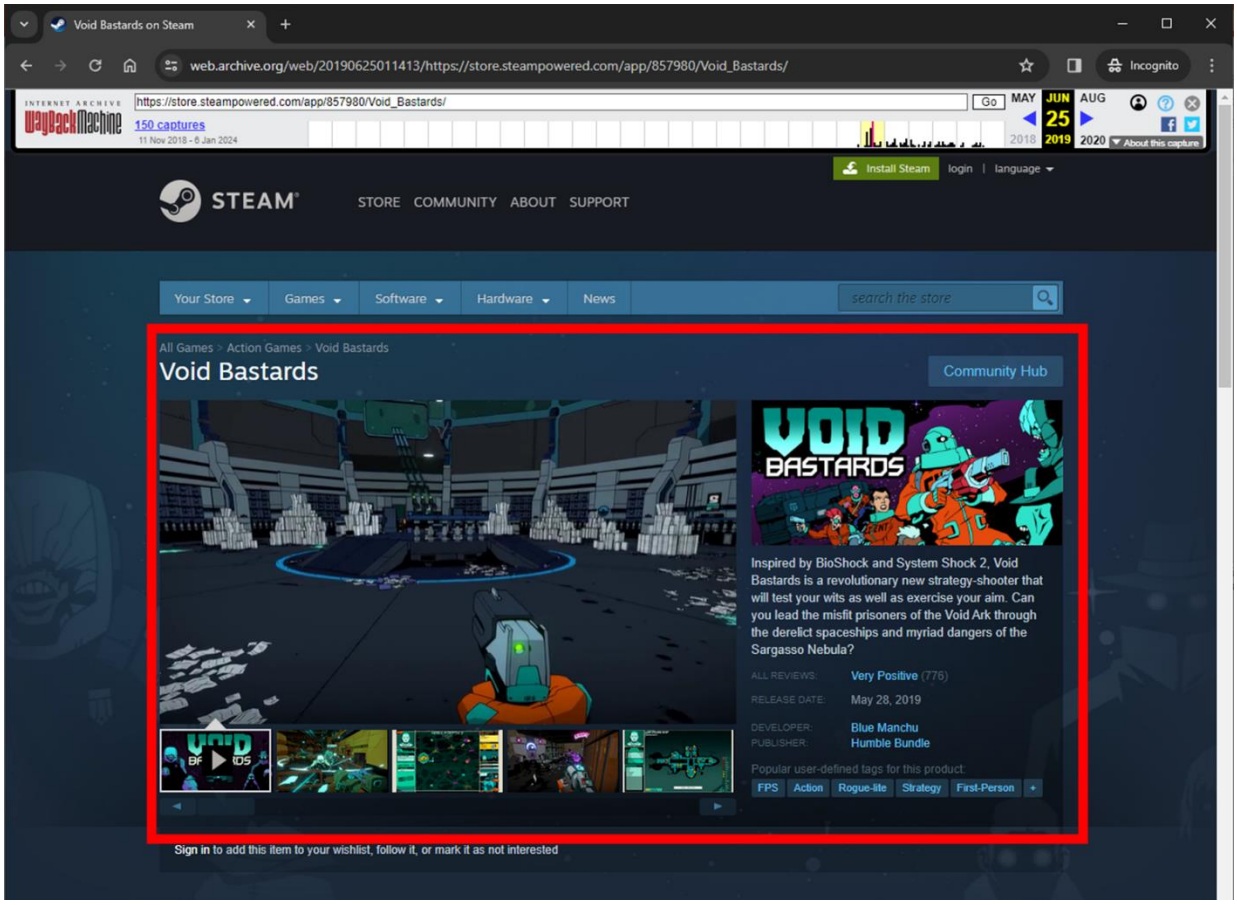

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

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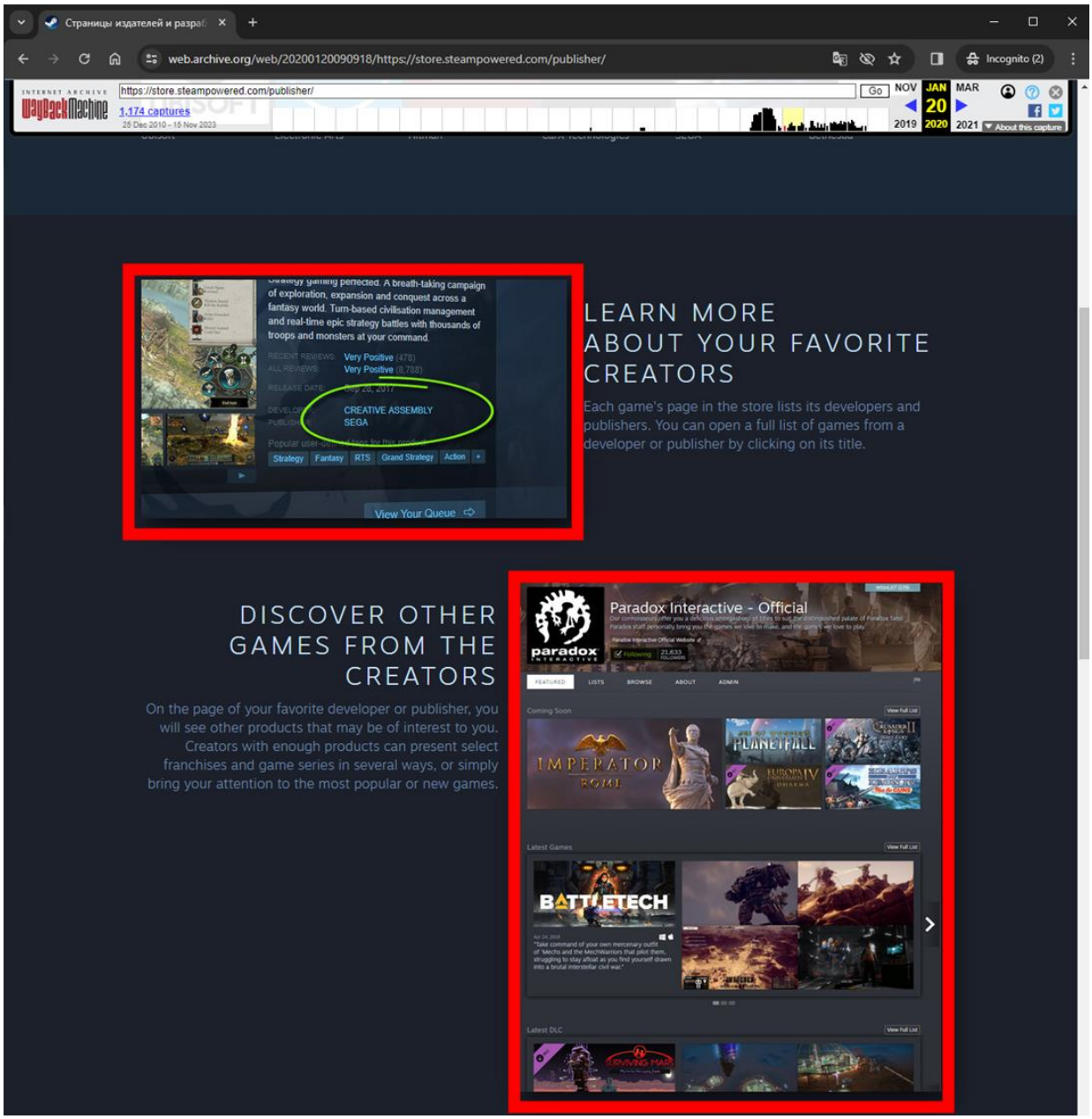

(*E.g.*, https://web.archive.org/web/20200120090918/https://store.steampowered.com/publisher/).

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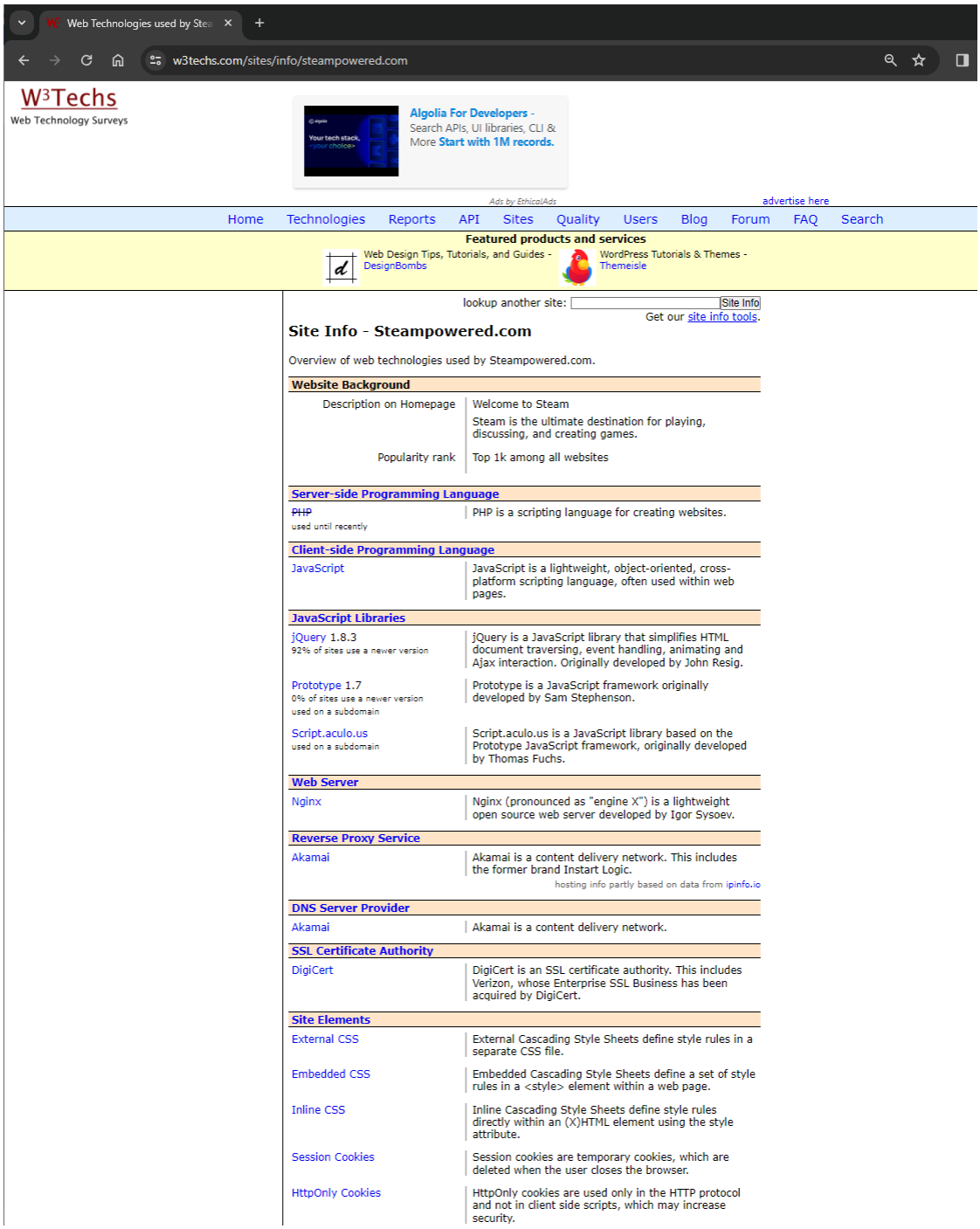

(*E.g.*, https://w3techs.com/sites/info/steampowered.com).

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Web Technologies used by Stea

w3techs.com/sites/info/steampowered.com

Inline CSS	Inline Cascading Style Sheets define style rules directly within an (X)HTML element using the style attribute.
Session Cookies	Session cookies are temporary cookies, which are deleted when the user closes the browser.
HttpOnly Cookies	HttpOnly cookies are used only in the HTTP protocol and not in client side scripts, which may increase security.
Non-HttpOnly Cookies	Non-HttpOnly cookies are used in the HTTP protocol and also in client side scripts, which may be a security threat.
Secure Cookies	Secure cookies are used only via an encrypted connections, which may increase security.
Gzip Compression	Gzip (GNU zip) is a file compression algorithm.
HTTP Strict Transport Security	HTTP Strict Transport Security (HSTS) defines a mechanism enabling web sites to declare themselves accessible only via secure connections.
Default protocol https	The websites redirects visitors to use SSL encryption, e.g. from http://example.com/ to https://example.com/.
Structured Data Formats	
Open Graph	The Open Graph protocol, originally developed by Facebook, is an RDFa-based format that enables any web page to become a rich object in a social graph.
Twitter Cards	Twitter Cards enable automatic attachment of photos, videos and media elements to Tweets.
Generic RDFa	Generic RDFa (Resource Description Framework in attributes) is RDFa without further specialization.
Microdata used on a subdomain	Microdata is a specification to integrate metadata within existing content on web pages.
Markup Language	
HTML5	HTML5 is the fifth revision of the HTML standard.
Character Encoding	
UTF-8	UTF-8 (8-bit Unicode Transformation Format) is a variable-length character encoding for Unicode, which is backwards compatible with ASCII.
Image File Formats	
PNG	PNG (Portable Network Graphics) is a lossless compression image format, suitable to store graphics with uniformly colored areas, and originally introduced as a free, open-source successor of GIF.
JPEG	JPEG (Joint Photographic Experts Group) is a lossy compression method suitable to store photographic images.
SVG	Scalable Vector Graphics (SVG) is an XML-based vector image format.
GIF	GIF (Graphics Interchange Format) is a lossless compression image format, originally introduced by CompuServe and suitable to store graphics, logos and simple animations.
Top Level Domain	
.com	Commercial entities
Content Language	
English	

Share this page

(*E.g.*, https://w3techs.com/sites/info/steampowered.com).

25. The Accused Instrumentality includes an electronic media submissions server subsystem, having one or more data processing apparatus and an electronic media submissions database stored on a non-transitory medium in order to process and store received submissions

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from a plurality of developers/publishers (submitters), for example content pertaining to their respective electronic media submission/video game title on the Accused Instrumentality, as well as multimedia content to be displayed on the developer/publisher page, as discussed and shown for example in connection with the above discussion. The submissions pertaining to building a developer/publisher page and to posting a video game title may include *e.g.*, photo, video and/or textual content. The submissions are provided to the Accused Instrumentality via a submissions electronic interface, *e.g.*, a web-based content portal, accessible for example by logging in and selecting options to upload such content or import content, configured to receive such electronic media, from a plurality of submitters (*e.g.*, developers/publishers/users) over a public network (*e.g.*, the Internet) and stored, via an uploading process, in said electronic media submissions database for use in distribution to other users of the Accused Instrumentality.

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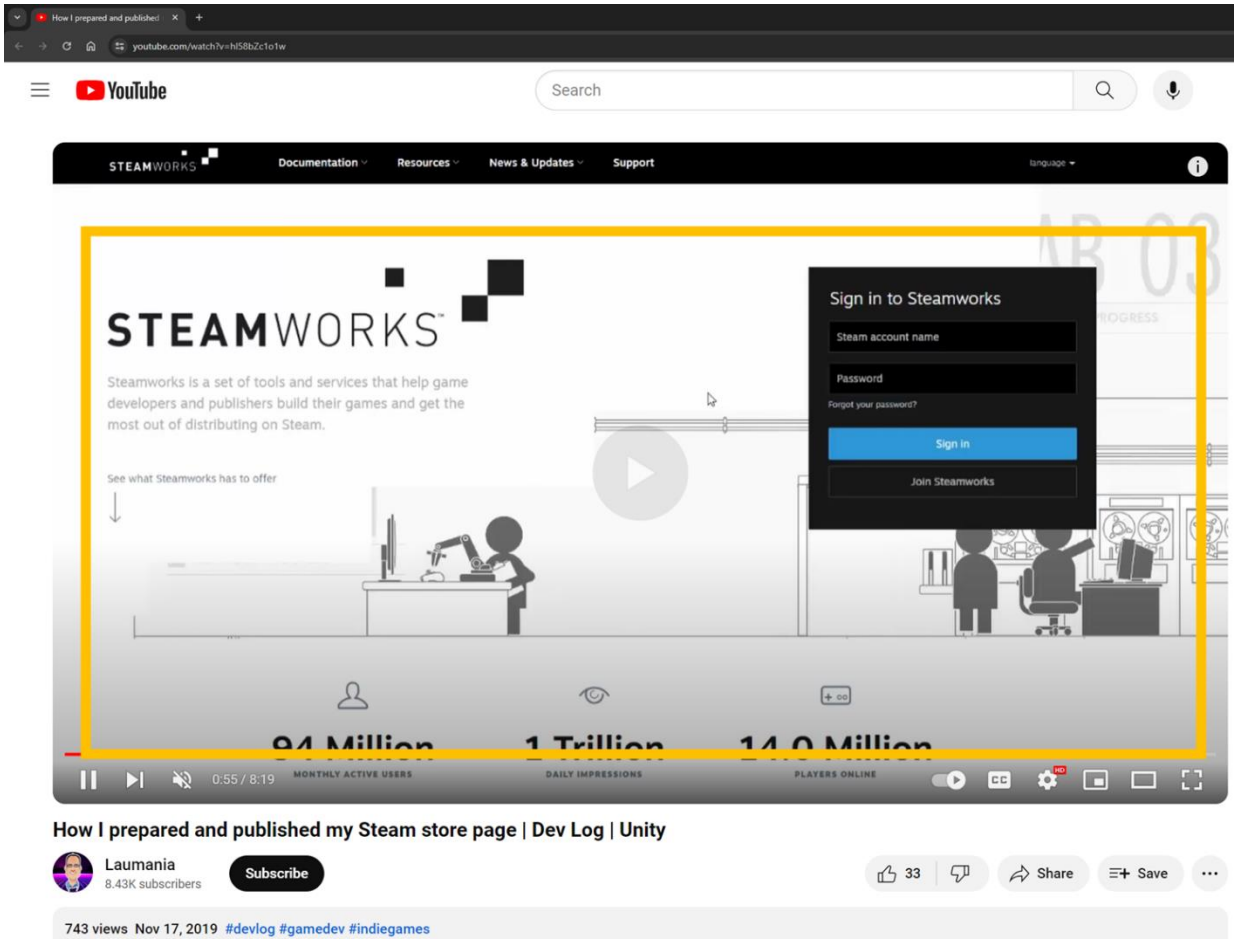

(*E.g.*, https://www.youtube.com/watch?v=hI58bZc1o1w).

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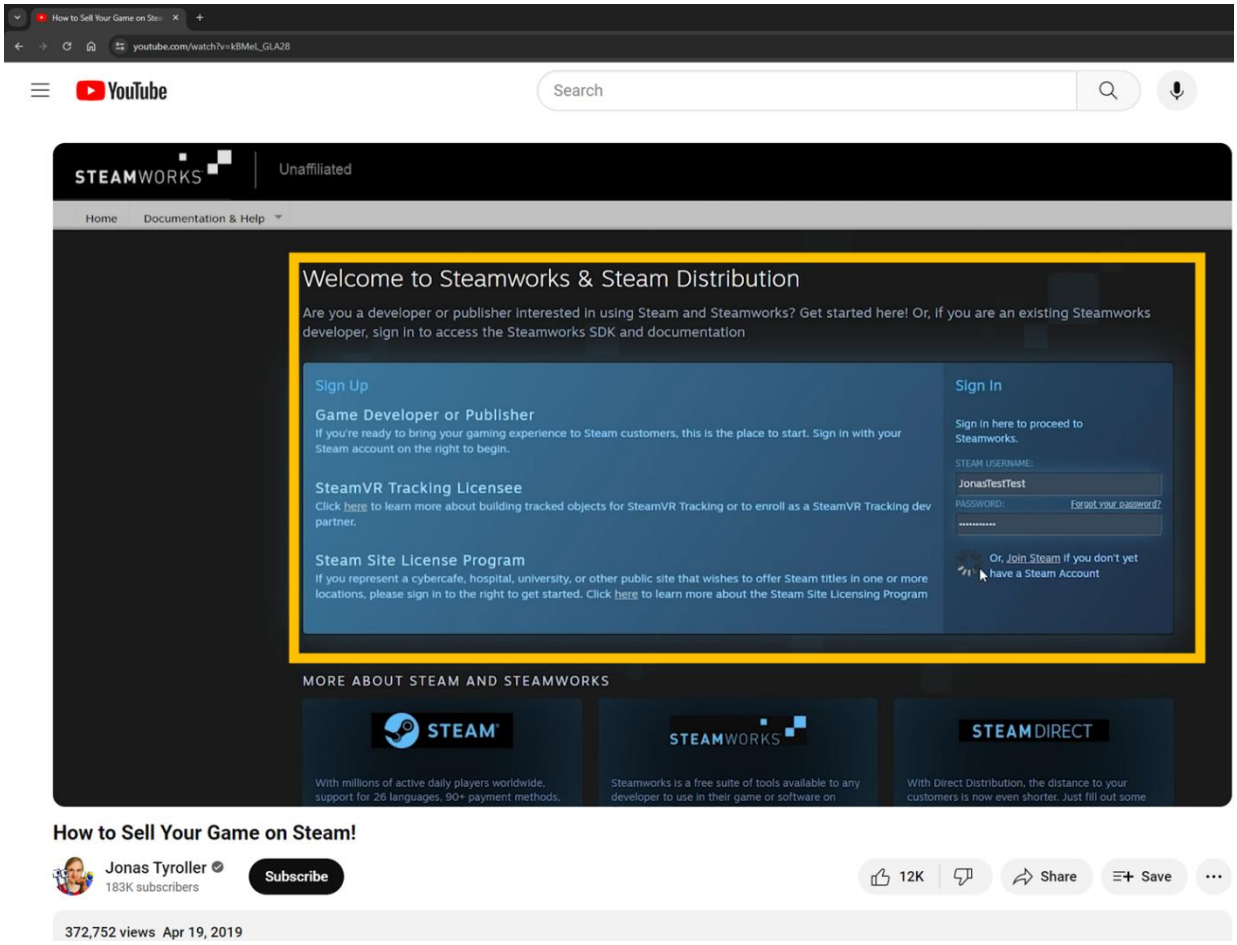

(*E.g.*, https://www.youtube.com/watch?v=kBMeL_GLA28).

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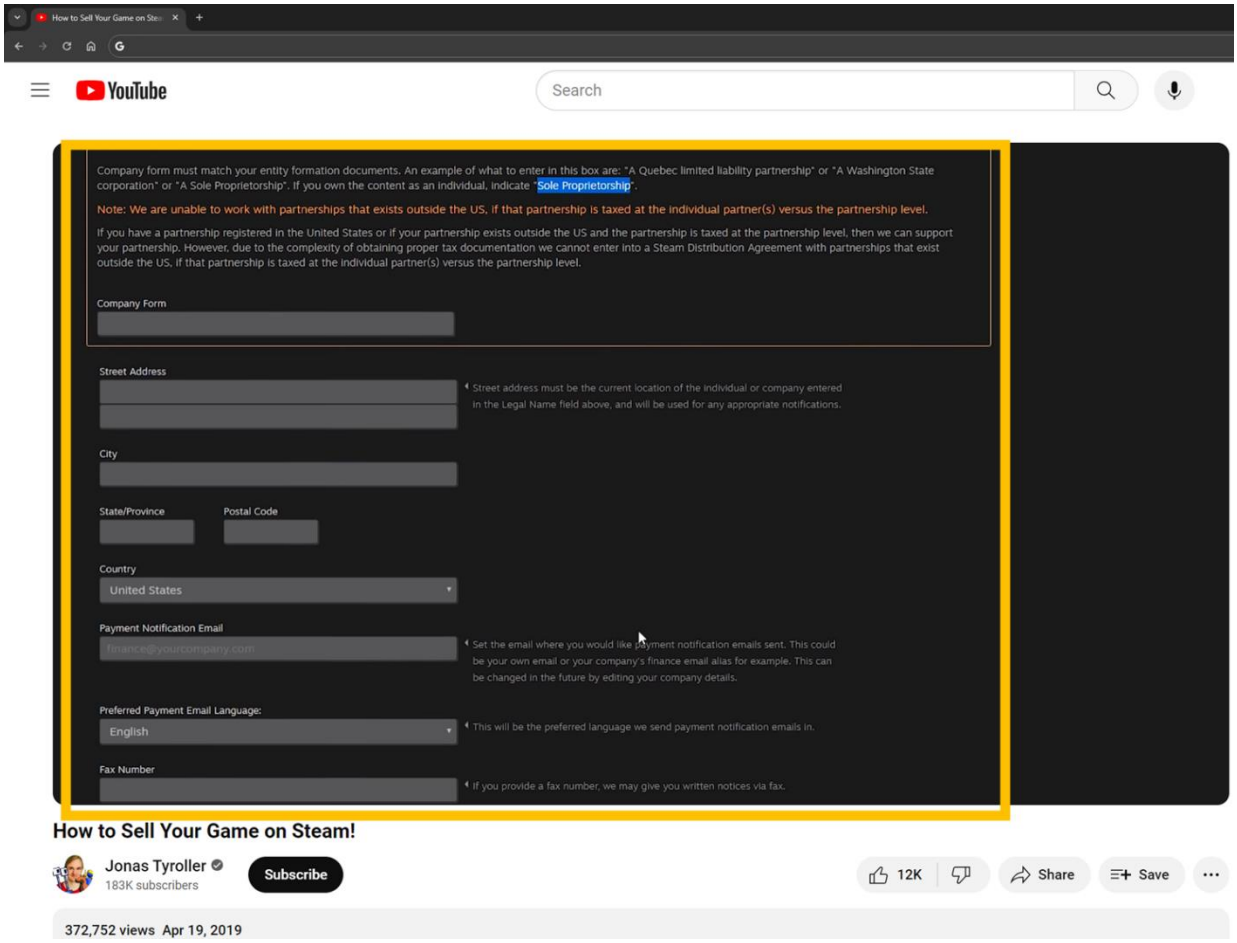

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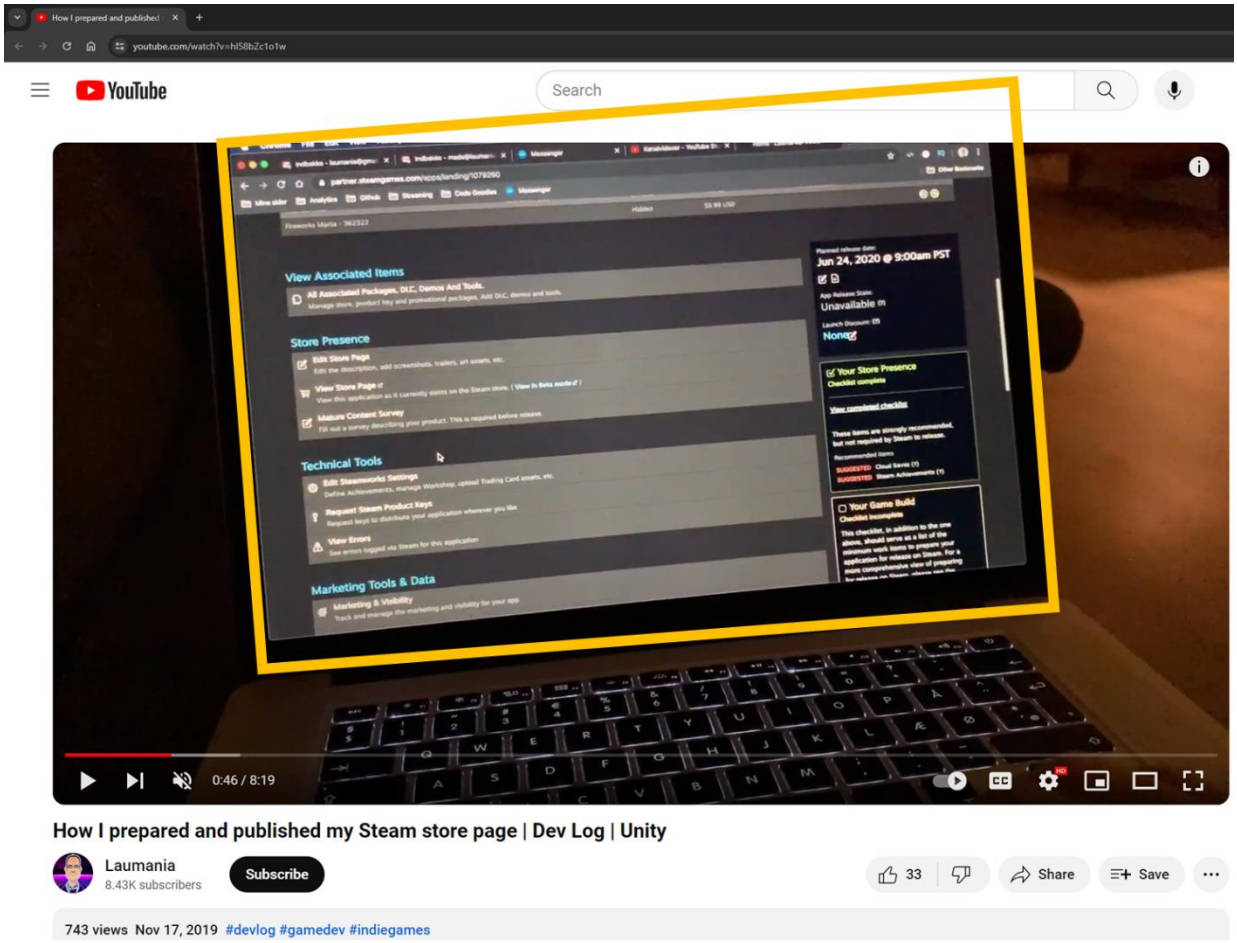

(*E.g.*, https://www.youtube.com/watch?v=hI58bZc1o1w).

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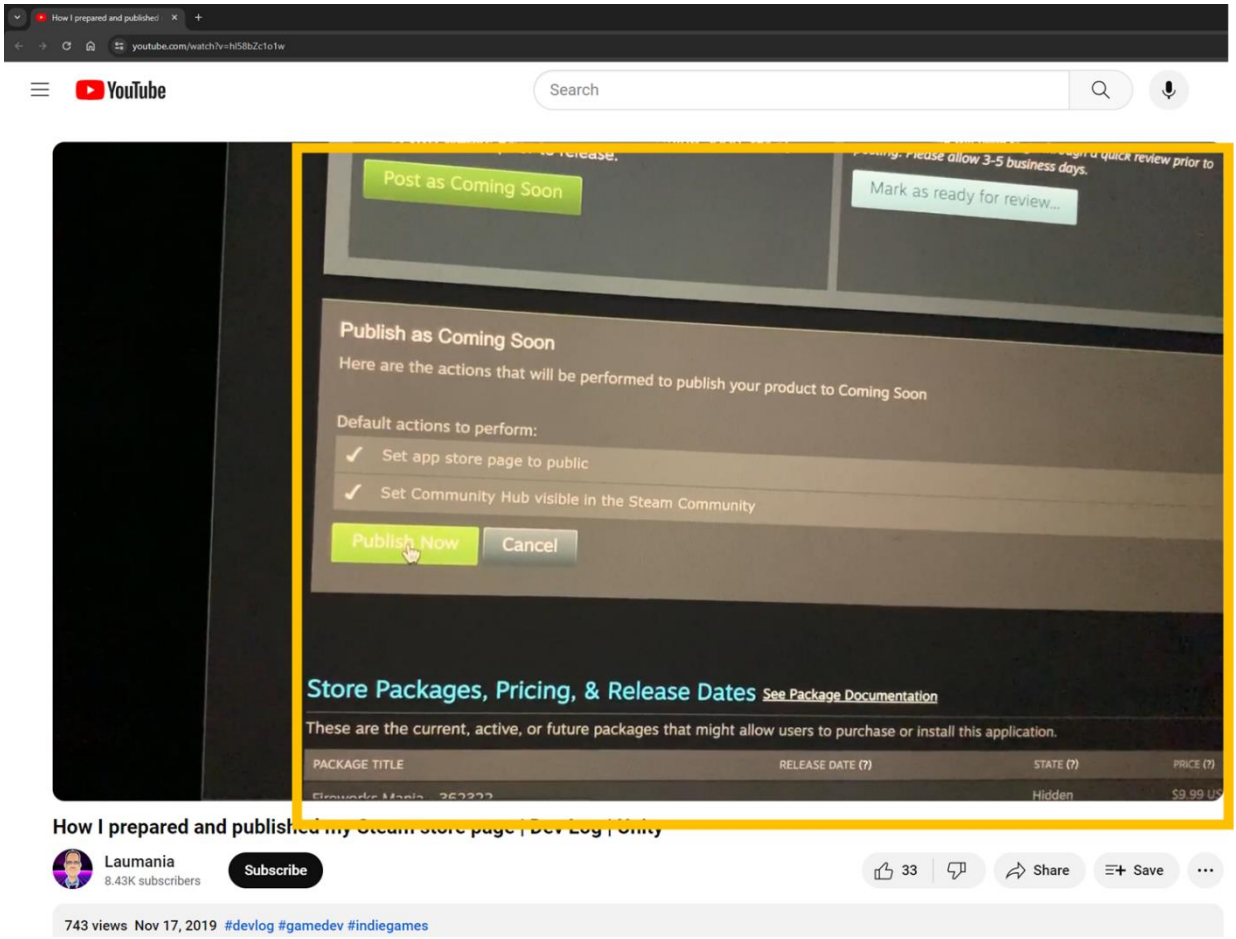

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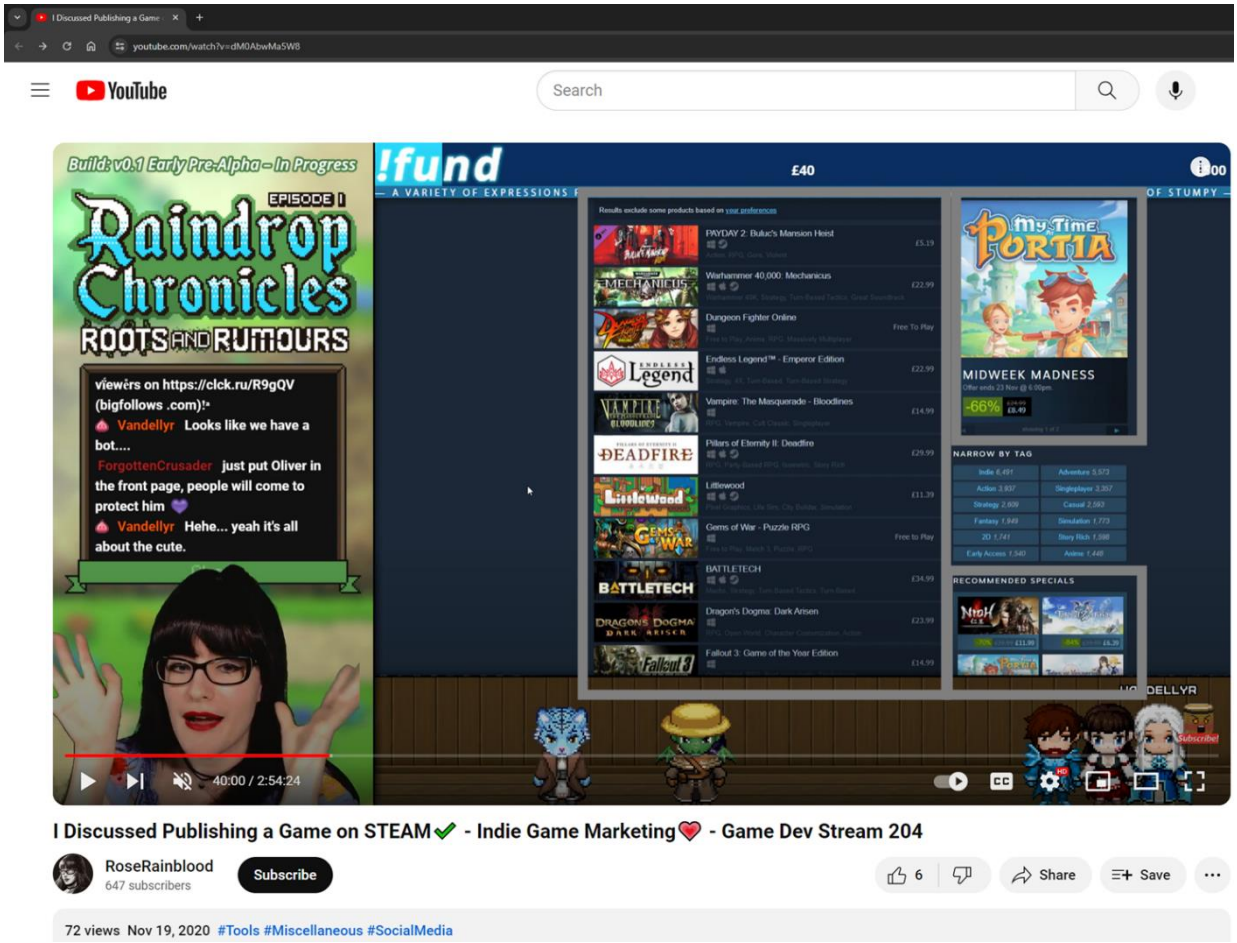

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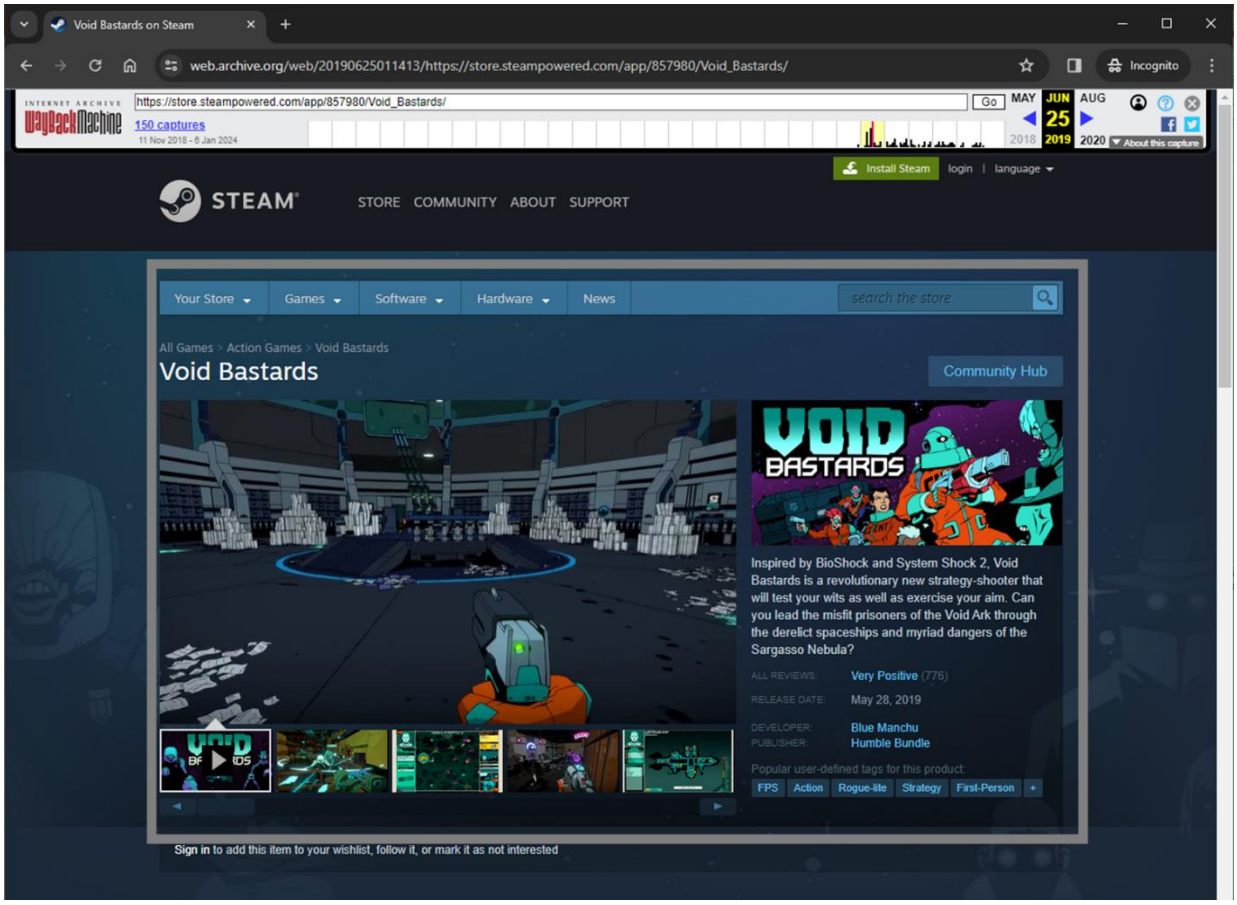

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

26. The electronic media submissions database of the Accused Instrumentality used by Valve which stores the submissions further stores data identifying the submitter and data indicating content for each electronic media submission/video game title. As shown below, data identifying the developer/publisher (submitter) includes, *e.g.*, a name and/or a developer/publisher photo. Data indicating content for each electronic media submission includes photo, video and/or textual content pertaining to the video game title.

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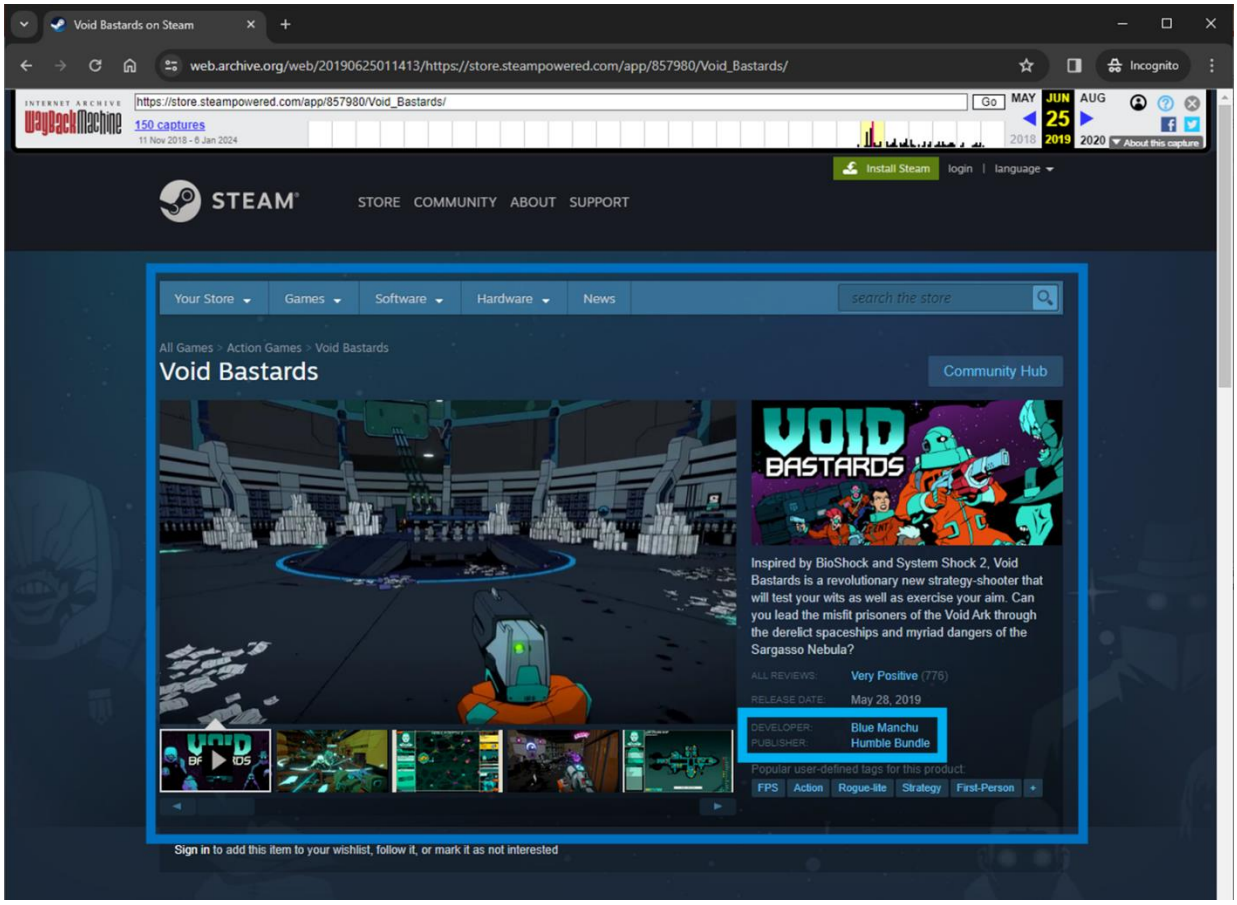

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

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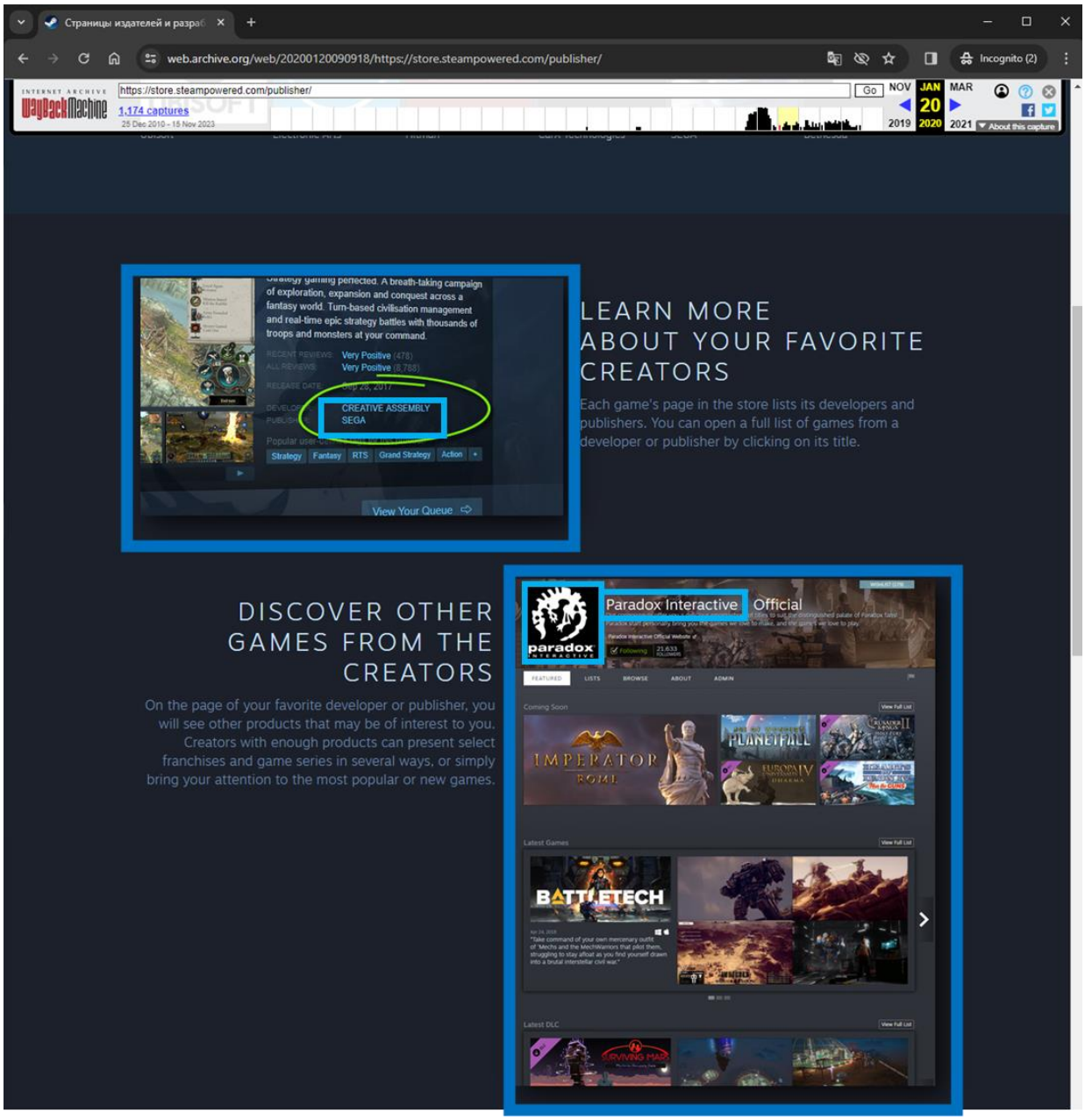

(*E.g.*, https://web.archive.org/web/20200120090918/https://store.steampowered.com/publisher/).

27. Individual developers/publishers can sign up and create a developer/publisher page and publish video game titles on Valve Corp's Accused Instrumentality, which are stored on a user database. Such user database is stored in memory available through the Accused Instrumentality, for example as discussed above. The user attributes contained on the user

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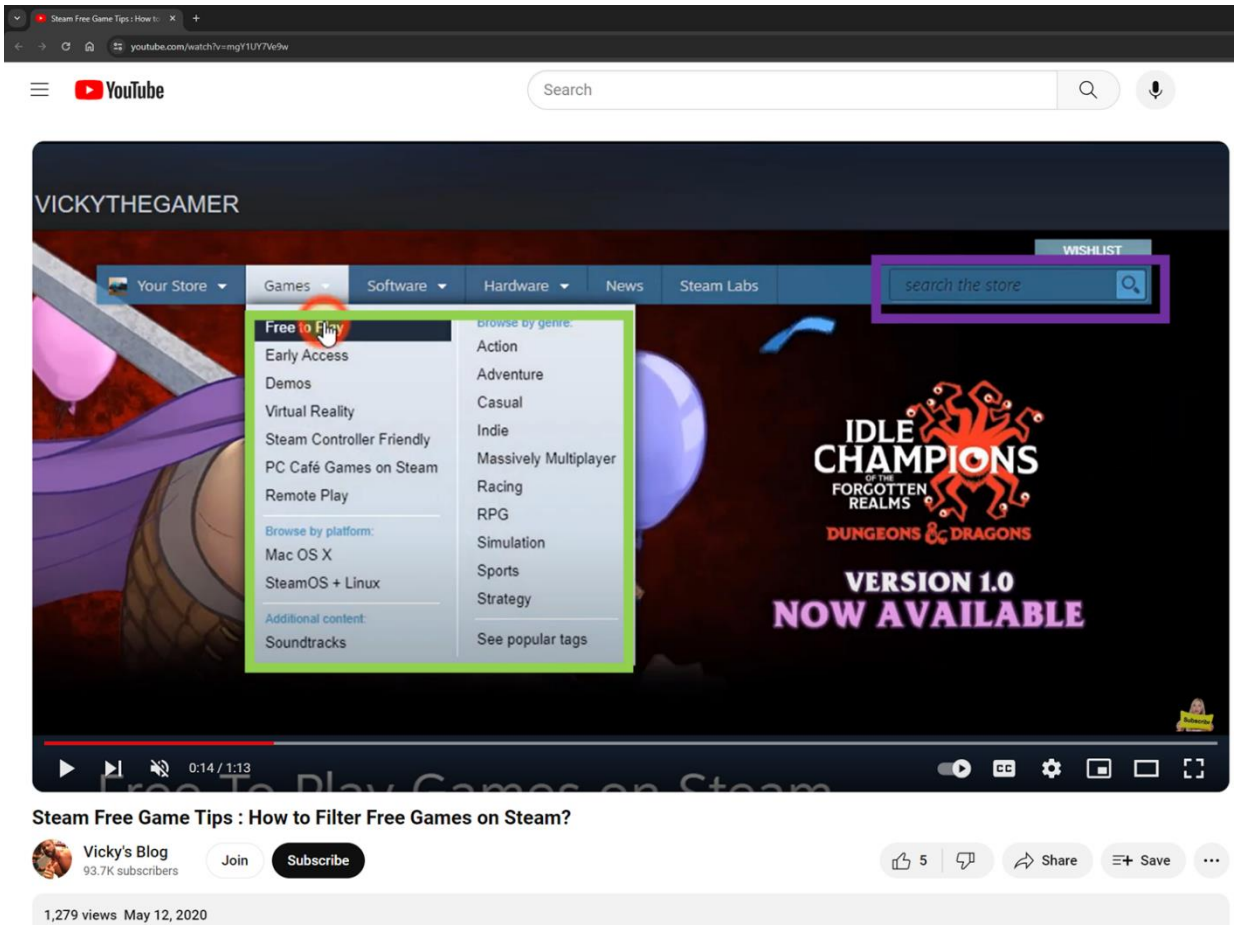
database, may include, *e.g.*, special features of interest to users such as "free to play," "early access," "demons" and the like, as well as genre, platform, and tags, and the like such as is shown, for example, in the examples below.



(*E.g.*, https://www.youtube.com/watch?v=mgY1UY7Ve9w).

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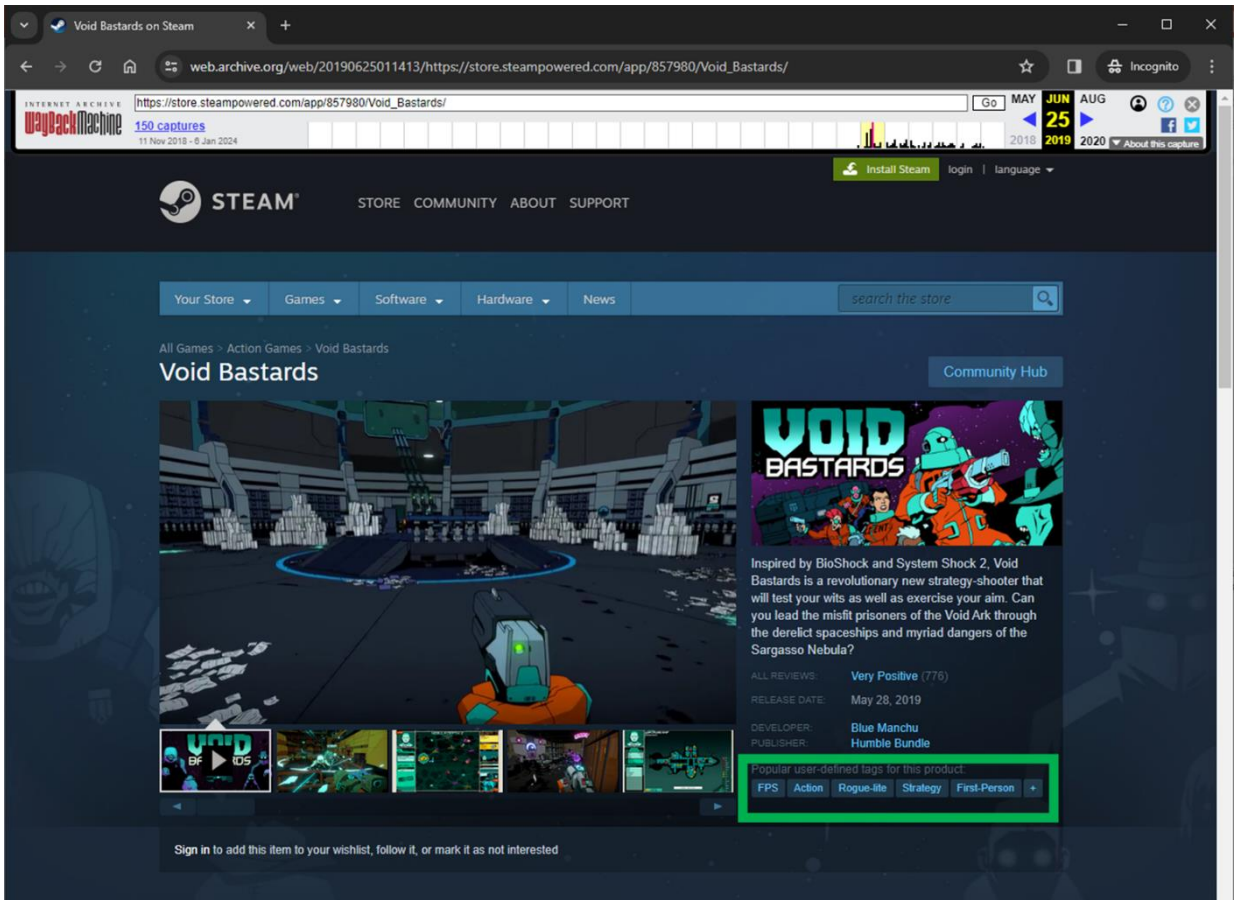

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

28. The Accused Instrumentality employs an electronic multimedia creator server subsystem operatively coupled to the electronic media submissions server subsystem, necessarily having one or more data processing apparatus in order to manage content, and an electronic creator multimedia database stored on a non-transitory medium, configured to select and retrieve a plurality of electronic media submissions (*e.g.*, published video game titles with associated photo content, video content and/or textual content) from the electronic media submissions database using an electronic content filter located on the electronic multimedia creator server. As can be seen below, such electronic content filter as is used by Valve is based at least in part on at least one of the one or more user attributes, (*e.g.*, based on, *inter alia*, special features of

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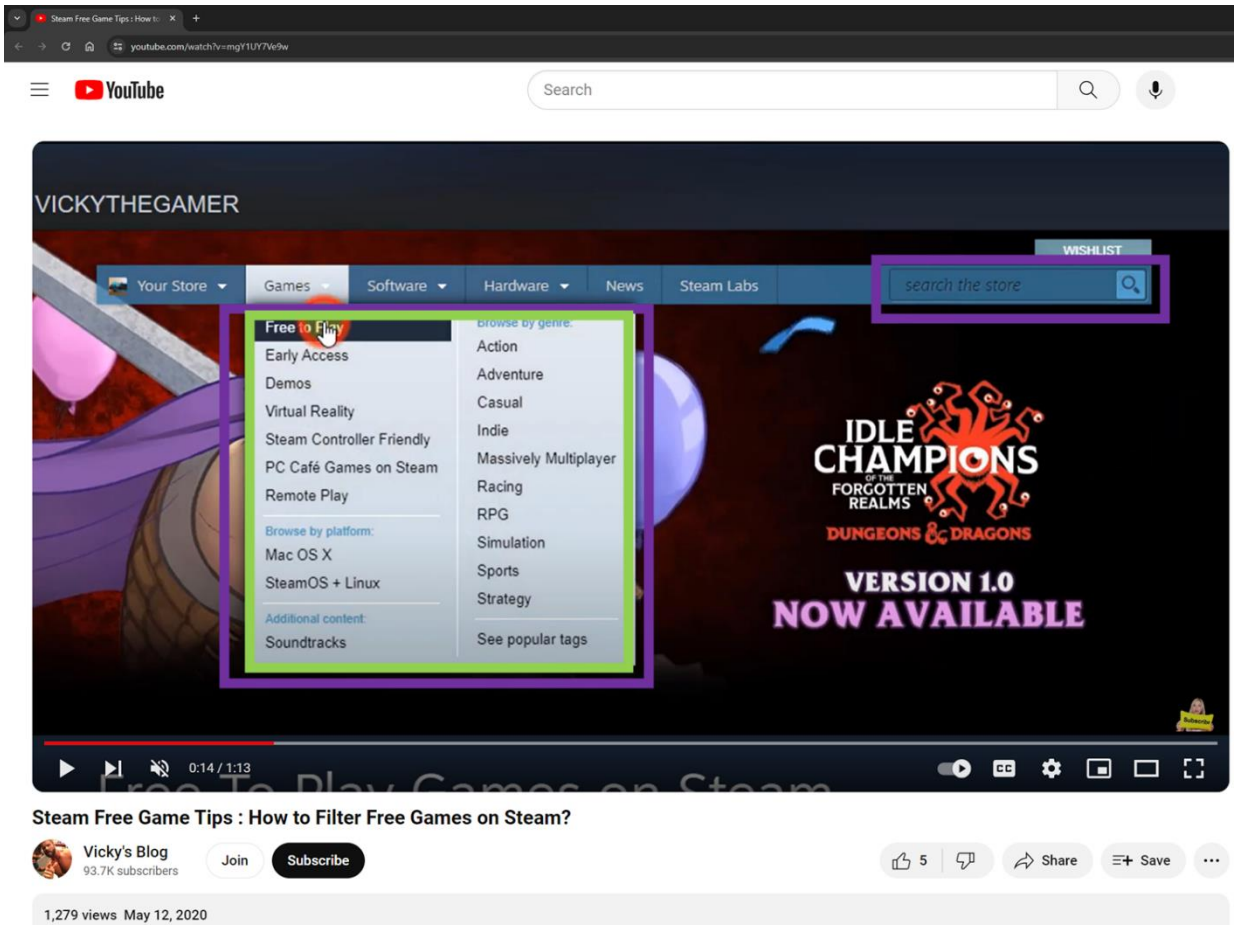
interest to users such as "free to play," "early access," "demons" and the like, as well as genre, platform and tags) which in turn affect which electronic media submissions, *e.g.*, published video game titles and associated media, appear to the user as shown and discussed for example below.



(*E.g.*, https://www.youtube.com/watch?v=mgY1UY7Ve9w).

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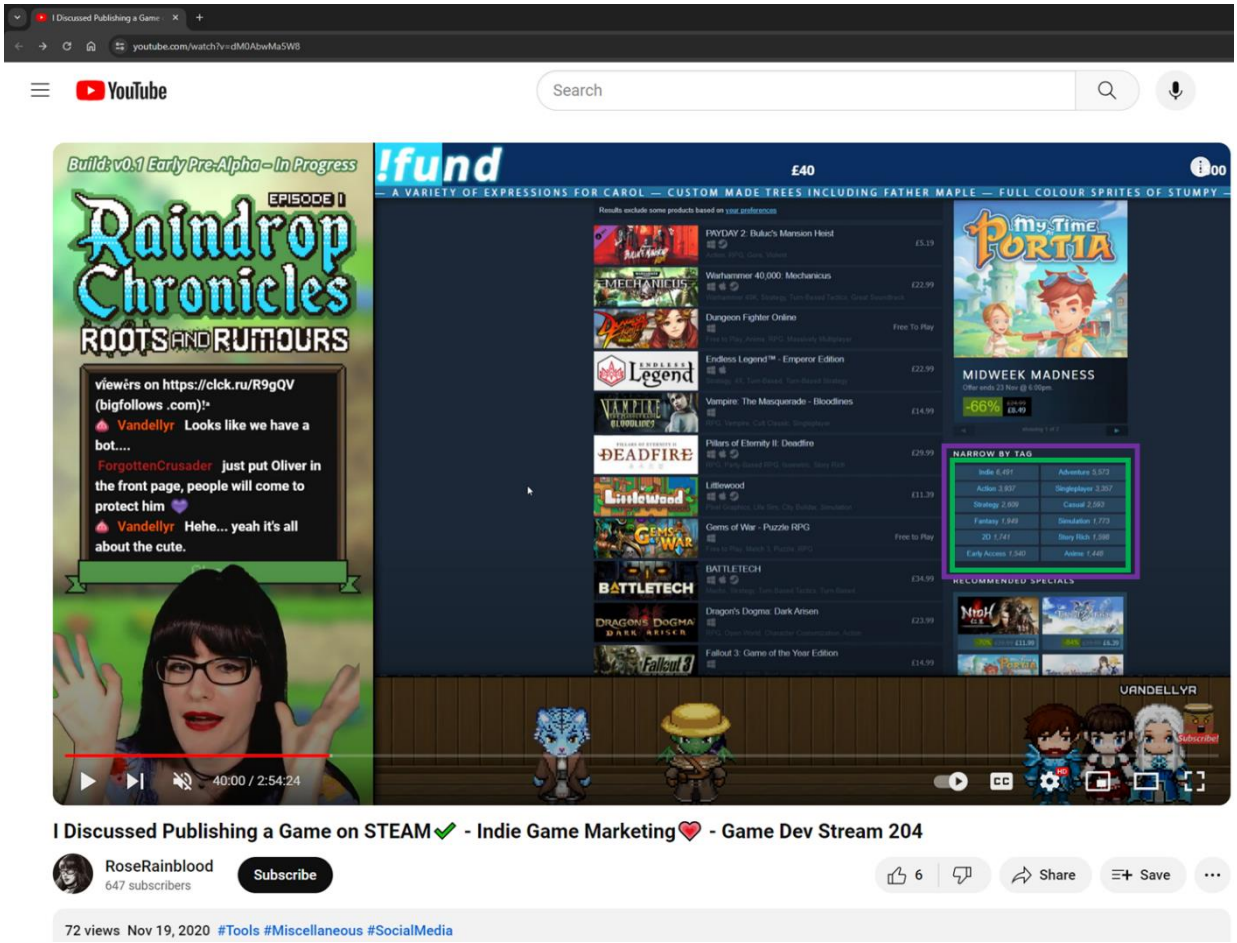

(*E.g.*, https://www.youtube.com/watch?v=dM0AbwMa5W8).

29. Such electronic content filter is used by the Accused Instrumentality to develop multimedia content (*e.g.*, the developer/publisher pages, video game titles, and/or various content as discussed above) associated with the developer/publisher (submitter) to be electronically available for viewing on user devices (*e.g.*, devices such as computers and smart phones incorporating browsers or apps) wherein the identification of the submitter (*e.g.*, a developer/publisher's name) is maintained with each selected and retrieved submission within the multimedia content, for example as shown below.

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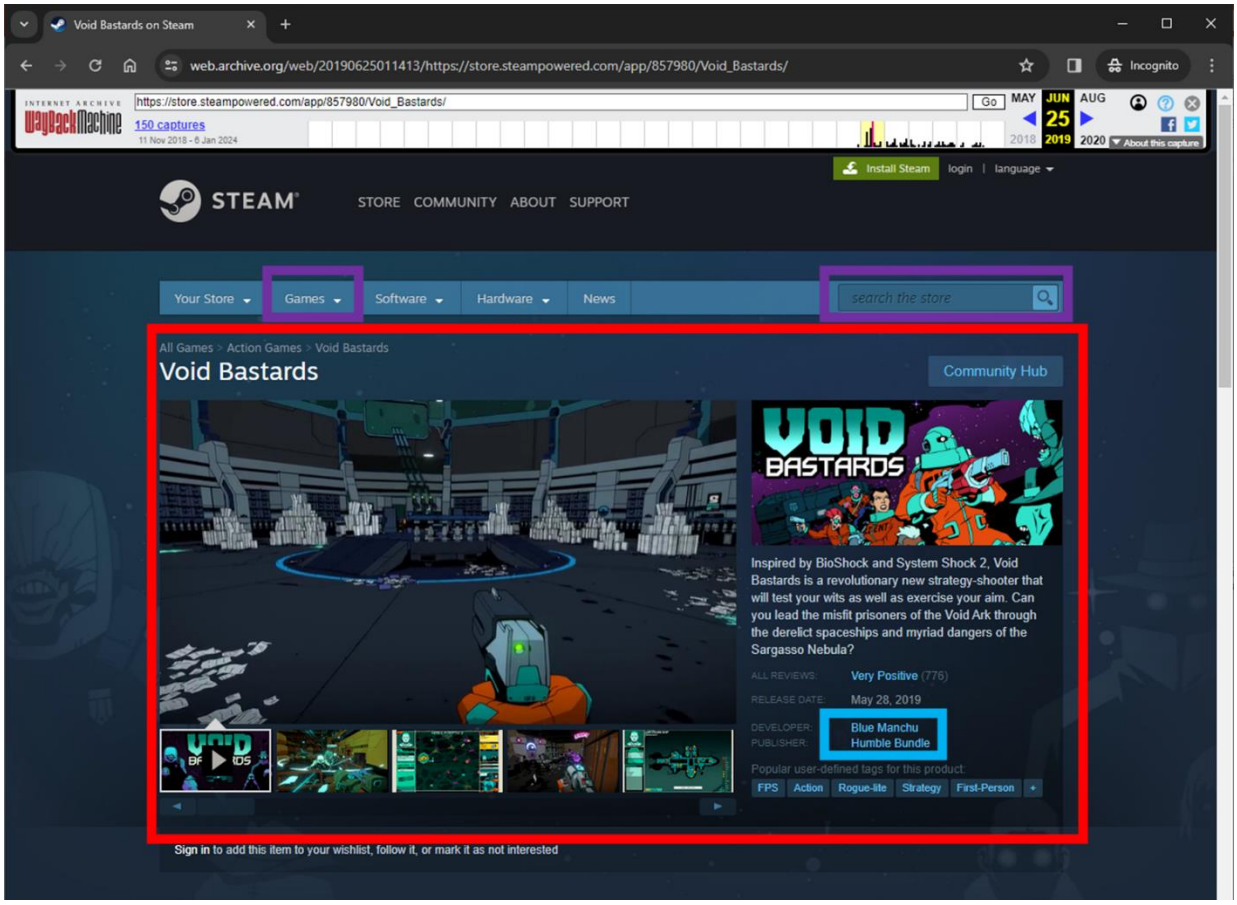

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

30. The Accused Instrumentality employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus to serve multimedia developer/publisher page and/or video game title-specific content with associated photo, video and/or textual content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. For example, as shown below, multimedia content associated with the video game title is provided on various user devices (*e.g.*, a computer or other device with a web browser or app) in response to a user logging in to the Accused Instrumentality. Valve uses function-specific subsystems, for example as discussed below.

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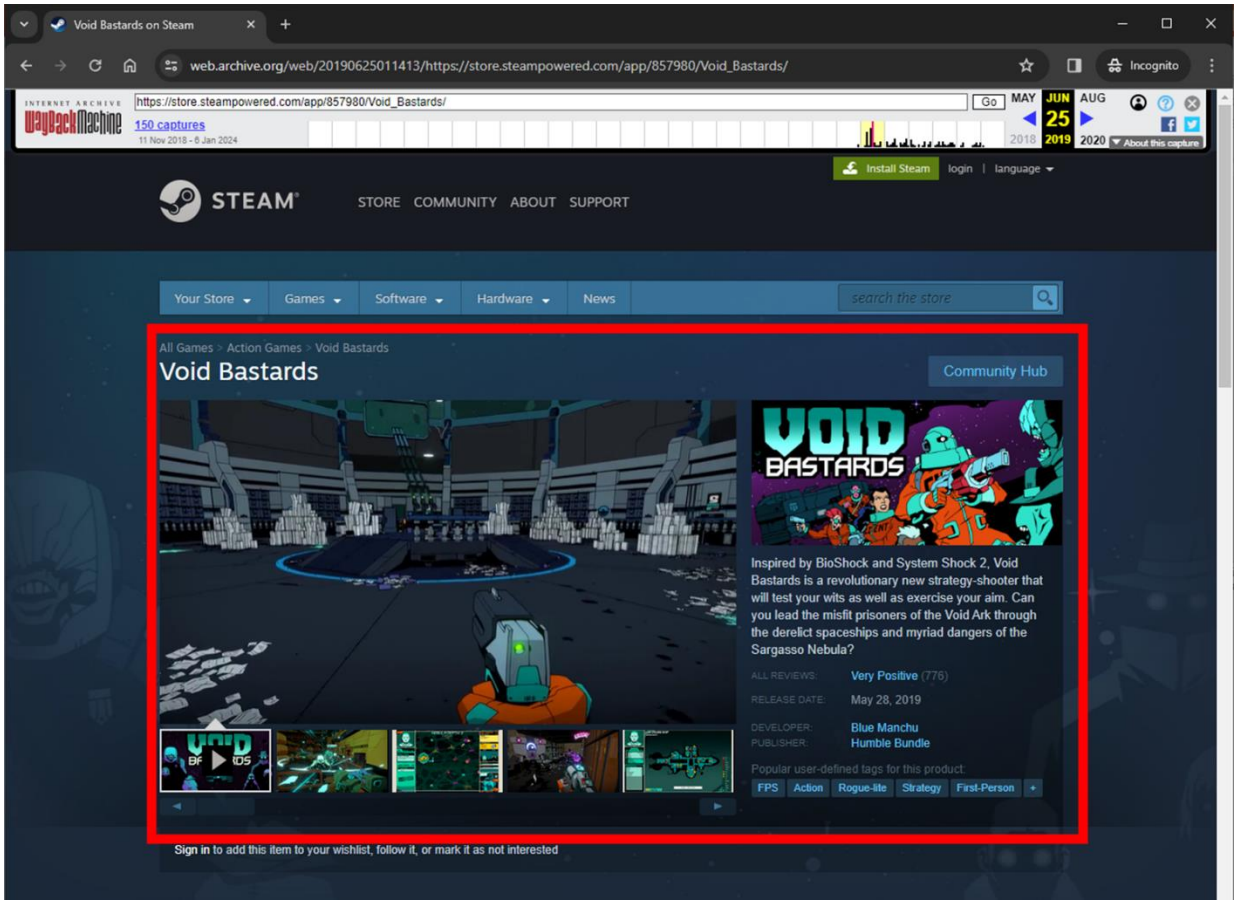

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

31. The Accused Instrumentality employs an electronic voting subsystem, necessarily having one or more data processing apparatus in order to track voting or electronic rating, configured to enable a user to electronically vote for or rate (*e.g.*, by the user's choices with respect to a selection of a thumbs up or a thumbs down and textual content in the form of a review) an electronically available multimedia content (*e.g.*, multimedia content pertaining to a video game title provided by a submitter, with accompanying photo, video and/or textual content). Valve uses function-specific subsystems, for example as discussed below.

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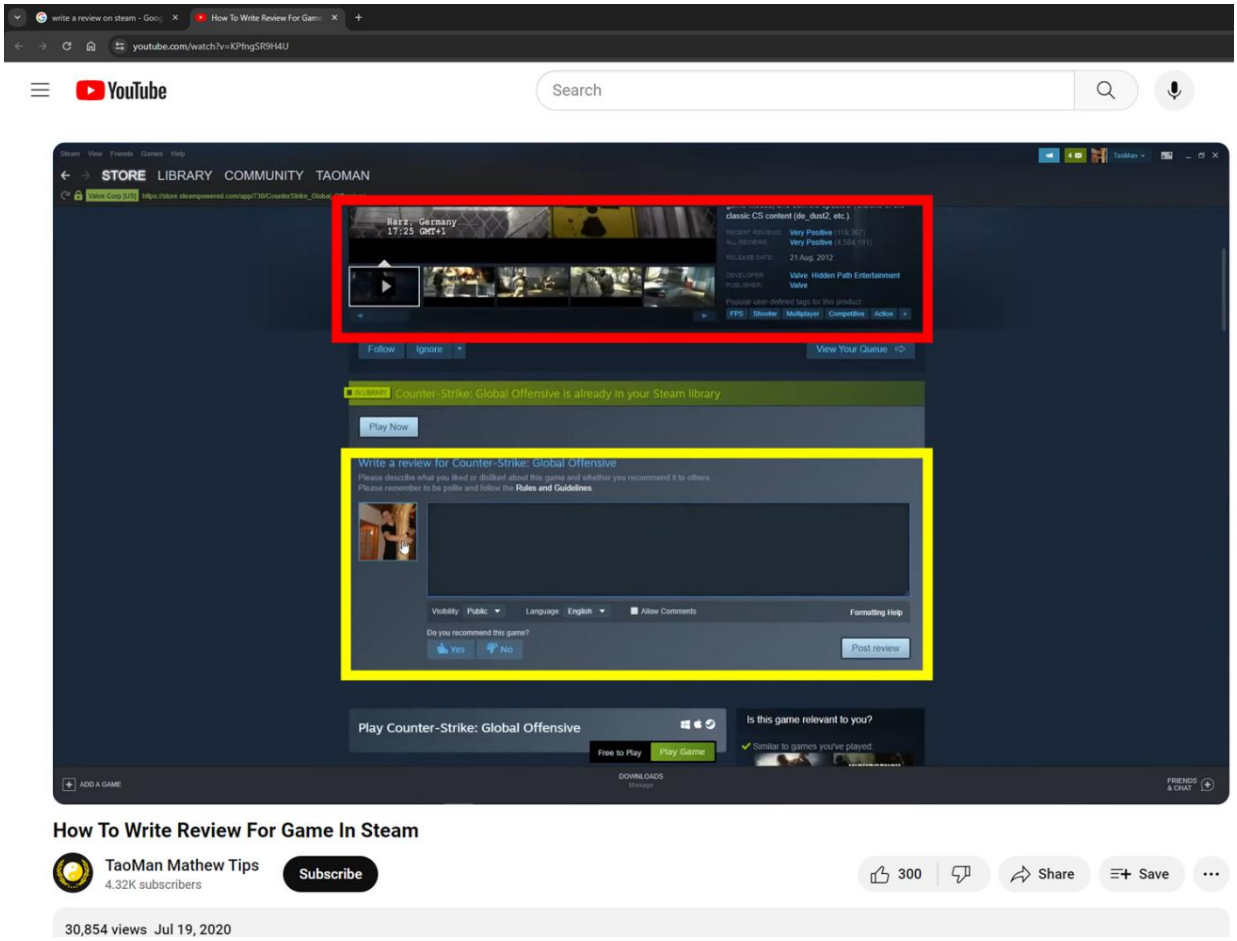

(*E.g.*, https://www.youtube.com/watch?v=KPfngSR9H4U).

32. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '480 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

33. On information and belief, to the extent marking is required, VCA has complied with all marking requirements.

V. COUNT II
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,477,665)

34. Plaintiff incorporates the above paragraphs herein by reference.

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35. On October 25, 2016, United States Patent No. 9,477,665 ("the '665 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '665 Patent is titled "Revenue-Generating Electronic Multi-Media Exchange and Process of Operating Same." A true and correct copy of the '665 Patent is attached hereto as Exhibit B and incorporated herein by reference.

36. VCA is the assignee of all right, title, and interest in the '665 Patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '665 Patent. Accordingly, VCA possesses the exclusive right and standing to prosecute the present action for infringement of the '665 Patent by Defendant.

37. The application leading to the '665 patent was filed November 16, 2012, which was a continuation of application no. 11/978,781, which issued as United States Patent No. 8,340,994, which was a continuation of application no. 09/565,438 which issued as United States Patent No. 7,308,413. (Ex. B at cover). The '665 patent was first assigned to Virtual Creative Artists, LLC. (*Id.*).

38. The '665 Patent shares the identical specification as the '480 patent and therefore VCA incorporates the background and discussion of the invention in Paragraphs 11-18. Furthermore claim 1 involves a system for generating multimedia content. The claim requires, among other things, electronically generating a multimedia file from the retrieved electronic media Submissions in accordance with a selected digital format, wherein the identification of the submitter is maintained with each retrieved submission within the multimedia file. The claim requires electronically transmitting the multimedia file to a plurality of publicly accessible webservers to be electronically available for viewing on one or more user devices over a public network via a web-browser and. This allows electronically transmit data indicating votes or rating of multimedia content in a much quicker and easier fashion based on specific user criteria.

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There is nothing abstract about this very particular, unconventional, and non-routine system for the generation of multimedia content as specifically claimed and there is no risk of preempting creating and distribution contention generally, or even within the context of the Internet.

39. The invention is a highly technical electronic process that cannot be achieved with the human mind and is instead rooted in computer technology, including the steps of:

- "electronically retrieving a plurality of electronic media submissions,"
- "electronically generating a multimedia file from the retrieved electronic media submissions in accordance with a selected digital format,"
- "electronically transmitting the multimedia file to a plurality of publicly accessible webservers to be electronically available for viewing on one or more user devices over a public network via a web-browser," and
- "providing a web-based graphical user interface that enables a user to electronically transmit data indicating a vote or rating for an electronically available multimedia content or an electronic media Submission within a respective electronically available multimedia content."

40. Each of these subsystems are configured in a very specific (and not generi0, unconventional and non-routine manner to offer the novel and non-obvious approach claimed invention. For example, claim 1 requires an "electronic media submissions database," which is a subsystem that receives media submissions from Internet users. This is not a generic database but rather a scalable database that must be able to receive, store, and manage multiple petabytes of multimedia data received from users all over the world. This is one of the many specialized databased required in the claim. In fact, the specification discloses the use of a sophisticated database management system known in the art at the time that was capable of handling data at this level, Oracle7. This type of database management system cannot operate on a generic computing system but rather requires specialized hardware and software.

41. The claim also provides details to explain how each step operates. For example, the claim requires "electronically retrieving a plurality of electronic media submissions from an

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electronic media submissions database using an electronic content filter located on one or more data processing apparatus." Further, "the electronic media submissions database" in this step is further required to "store[] [1] data identifying the submitter and [2] data indicating content for each electronic media submission." The step further requires and "electronic content filter." The "filter" also includes a very specific algorithm of "being based at least in part on at least one of the one or more user attributes."

42. The claims also require an "electronically generating a multimedia file from the retrieved electronic media submissions in accordance with a selected digital format." Manipulation of multimedia data in accordance with a selected digital format is far from generic and was not routine or conventional at the time of the invention. Further, this step requires that the "electronic media submissions database" "stores data identifying the submitter" and the "the identification of the submitter is maintained with each retrieved submission within the multimedia file."

43. The claims also require "providing a web-based graphical user interface that enables a user to electronically transmit data indicating a vote or rating for an electronically available multimedia content or an electronic media Submission within a respective electronically available multimedia content," which is a well-defined, specific, and unconventional feature. By including this additional voting/rating feature, the claims avoid any risk of preempting the creation and distribution of content.

44. The also has inventive concepts. For example, the claim requires that he filtering tool be at a specific location, remote from the end-users, with customizable filtering features specific to each end user. The "electronic content filter" is located at the server, remote from the end user, and customizable based on user attributes. The "electron voting" step at the time of the invention was also novel, inventive, and added sufficient inventive contributions to avoid a risk

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of preempting the creation and distribution of media content. It is clearly possible to create and distribute media content without every having to include a "voting" subsystem on what components should be included in such media content.

45. These arguments overcame a patent eligibility rejection under 35 U.S.C. §101 of the claim at issue during the prosecution of the '665 patent.

46. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claim 1 of the '665 Patent in Washington, and elsewhere in the United States, by employing a computer-based system using https://store.steampowered.com/ ("Accused Instrumentality") (*e.g.*, https://store.steampowered.com/).

47. Valve uses a computer system for its Accused Instrumentality, to enable video game developers/publishers (submitters) to create developer/publisher pages and to publish video game titles, and share multimedia content pertaining to the video game title (*e.g.*, image content, video content and textual content). Multimedia content pertaining to developer/publisher pages includes image and textual content (*e.g.*, a submitter's developer/publisher picture and an About section). The published video game titles include multimedia content including image, video and textual content (*e.g.*, a video game title name and video game title features and the like, and associated image content, video content and textual content) which may be shown to other users based on, *inter alia*, user attributes. This computer system makes use of one or more data processing apparatus, and a computer readable medium coupled to the one or more data processing apparatus having instructions stored thereon which, when executed by the one or more data processing apparatus, cause the one or more data processing apparatus to perform an electronic method comprising the functions as further discussed below. Valve, during the relevant time period, took advantage of multiple cloud server providers for the Accused Instrumentality, as discussed above, as well as scalability within its cloud server providers,

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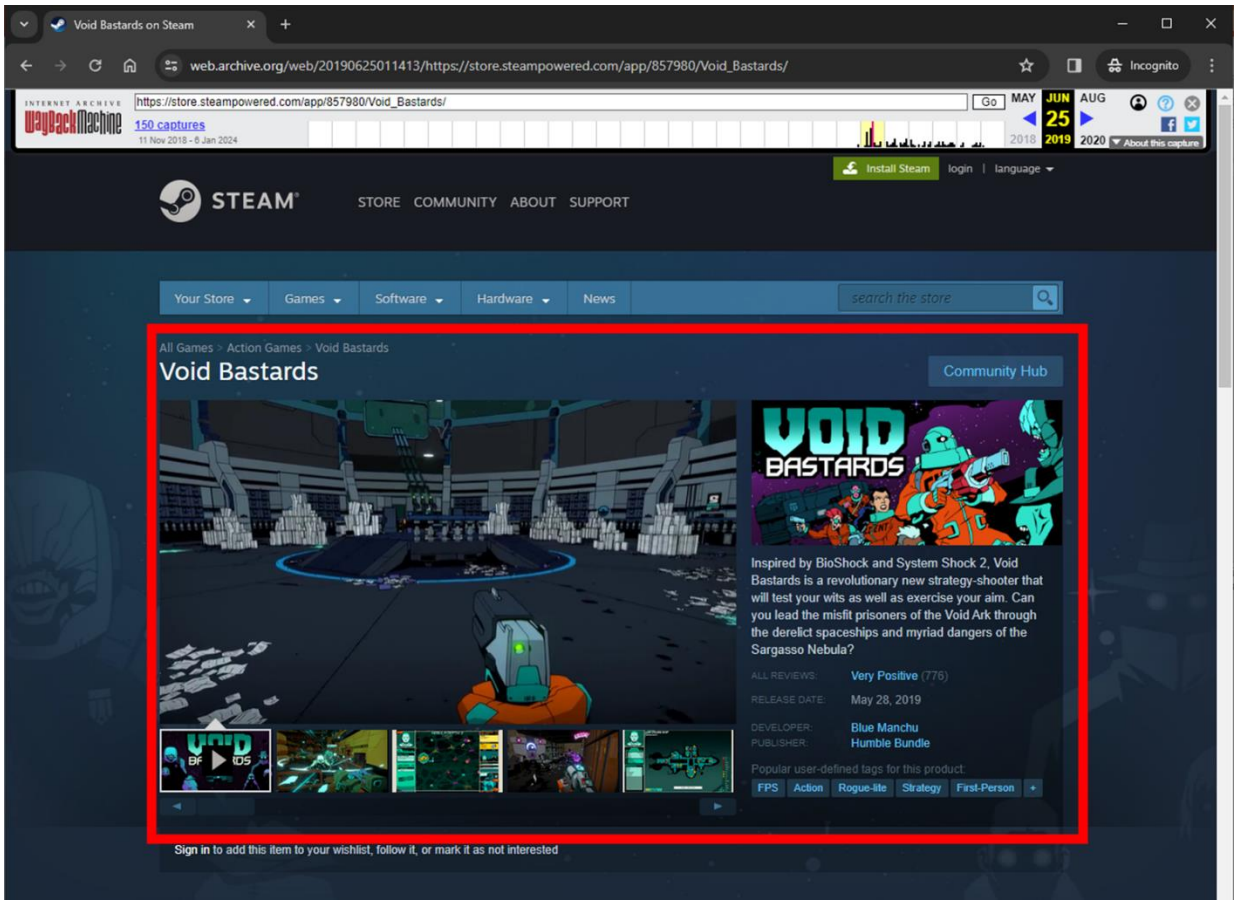
employing separate server subsystems for all its meaningfully different functions. Valve uses, and has used during the relevant time period, numerous different networks and providers for, *inter alia*, content management systems, web servers, web hosting, data centers, proxy certificates, SSL certificates, traffic analysis, advertising, and tagging, thereby using separate server subsystems for all its meaningfully different functions, such as those indicated below.



(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

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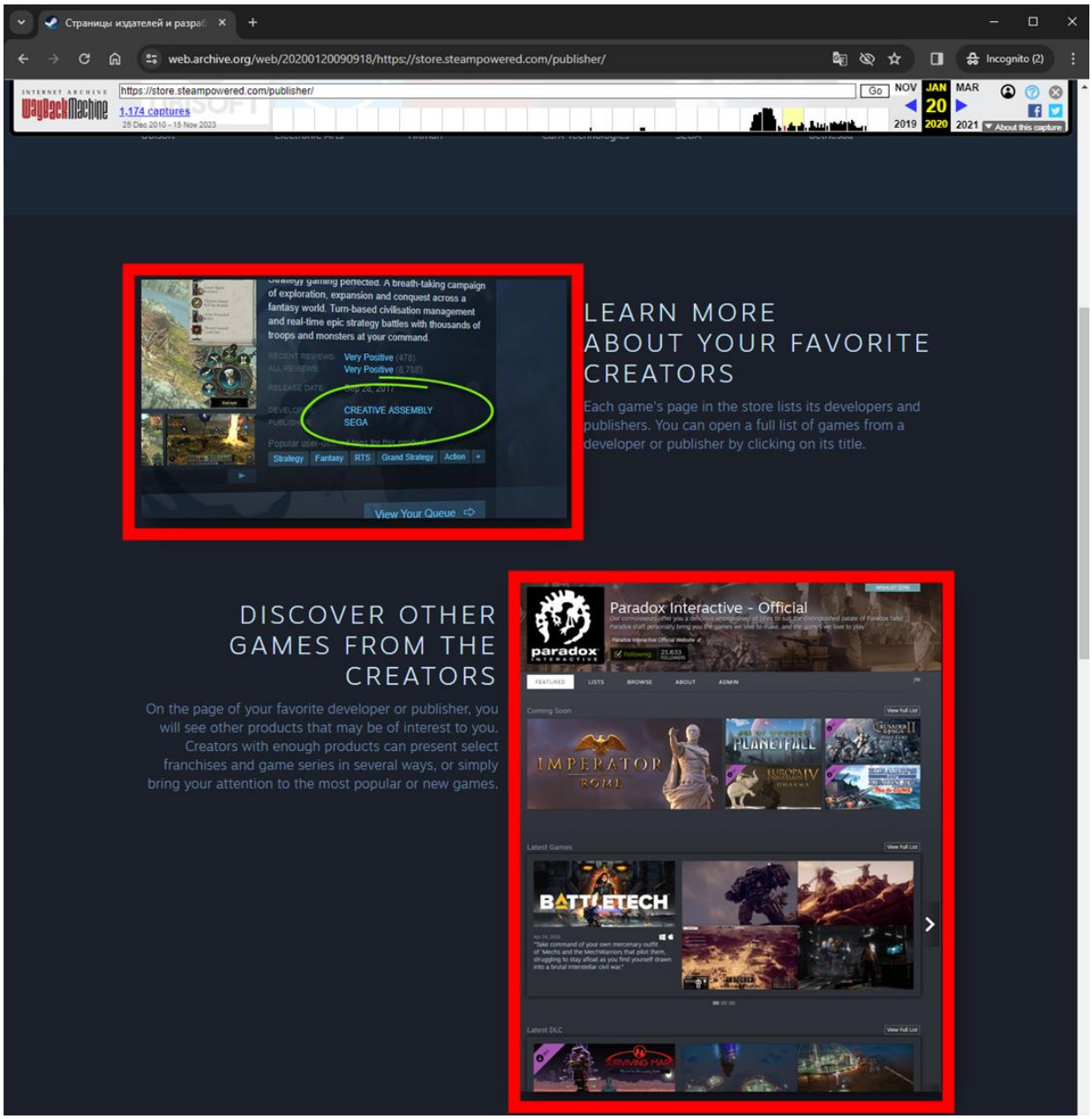

(*E.g.*, https://web.archive.org/web/20200120090918/https://store.steampowered.com/publisher/).

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Web Technologies used by Stea

w3techs.com/sites/info/steampowered.com

W³Techs
Web Technology Surveys

Algolia For Developers - Search APIs, UI libraries, CLI & More Start with 1M records.
Ads by EthicalAds
advertise here

Home Technologies Reports API Sites Quality Users Blog Forum FAQ Search

Featured products and services
Web Design Tips, Tutorials, and Guides - DesignBombs
WordPress Tutorials & Themes - Themeisle

lookup another site: Site Info
Get our site info tools.

Site Info - Steampowered.com

Overview of web technologies used by Steampowered.com.

Website Background	
Description on Homepage	Welcome to Steam Steam is the ultimate destination for playing, discussing, and creating games.
Popularity rank	Top 1k among all websites
Server-side Programming Language	
~~PHP~~ used until recently	PHP is a scripting language for creating websites.
Client-side Programming Language	
JavaScript	JavaScript is a lightweight, object-oriented, cross-platform scripting language, often used within web pages.
JavaScript Libraries	
jQuery 1.8.3 92% of sites use a newer version	jQuery is a JavaScript library that simplifies HTML document traversing, event handling, animating and Ajax interaction. Originally developed by John Resig.
Prototype 1.7 0% of sites use a newer version used on a subdomain	Prototype is a JavaScript framework originally developed by Sam Stephenson.
Script.aculo.us used on a subdomain	Script.aculo.us is a JavaScript library based on the Prototype JavaScript framework, originally developed by Thomas Fuchs.
Web Server	
Nginx	Nginx (pronounced as "engine X") is a lightweight open source web server developed by Igor Sysoev.
Reverse Proxy Service	
Akamai	Akamai is a content delivery network. This includes the former brand Instart Logic. hosting info partly based on data from ipinfo.io
DNS Server Provider	
Akamai	Akamai is a content delivery network.
SSL Certificate Authority	
DigiCert	DigiCert is an SSL certificate authority. This includes Verizon, whose Enterprise SSL Business has been acquired by DigiCert.
Site Elements	
External CSS	External Cascading Style Sheets define style rules in a separate CSS file.
Embedded CSS	Embedded Cascading Style Sheets define a set of style rules in a <style> element within a web page.
Inline CSS	Inline Cascading Style Sheets define style rules directly within an (X)HTML element using the style attribute.
Session Cookies	Session cookies are temporary cookies, which are deleted when the user closes the browser.
HttpOnly Cookies	HttpOnly cookies are used only in the HTTP protocol and not in client side scripts, which may increase security.

(*E.g.*, https://w3techs.com/sites/info/steampowered.com).

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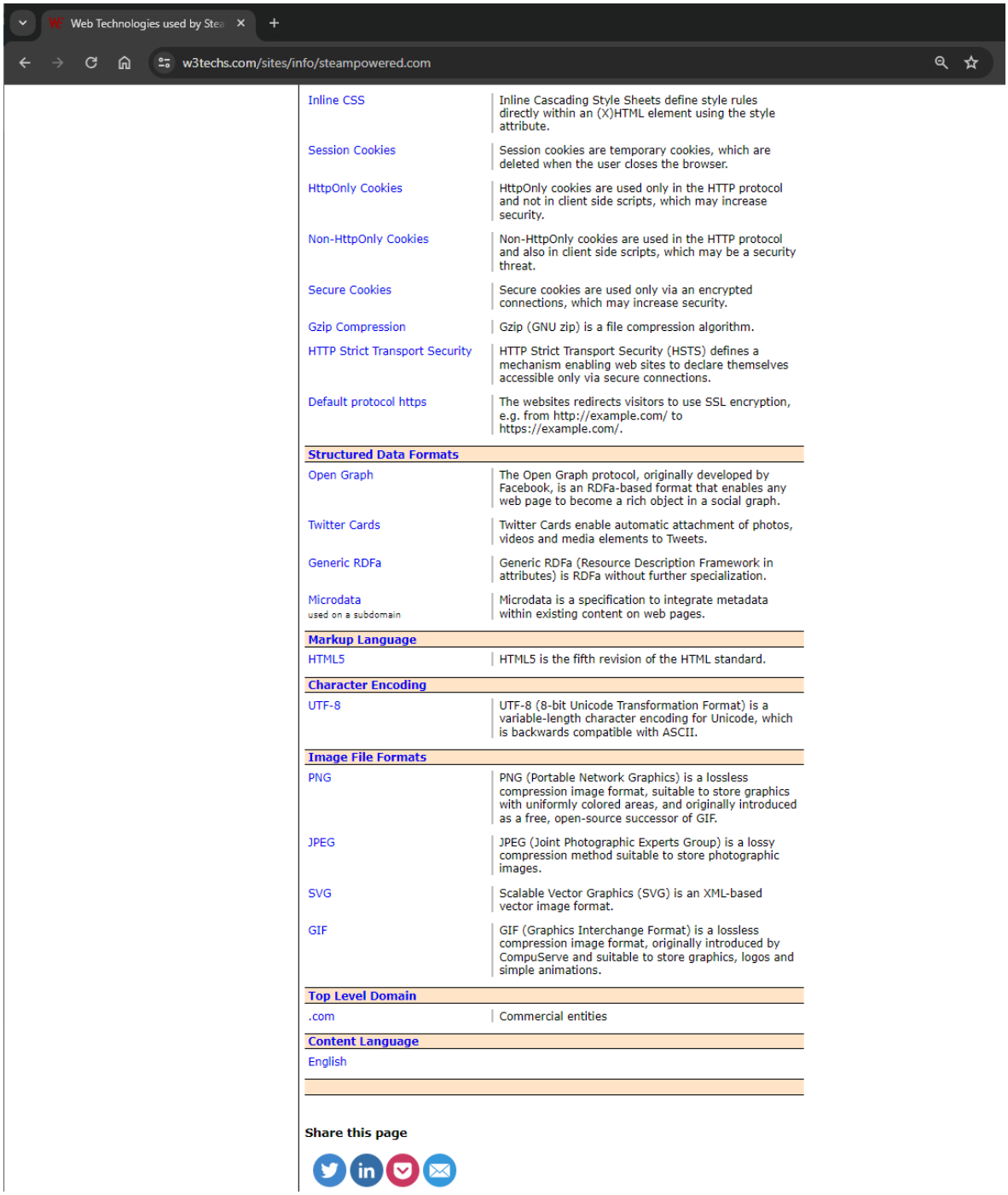

(*E.g.*, https://w3techs.com/sites/info/steampowered.com).

48. The Accused Instrumentality electronically retrieves a plurality of electronic media submissions from an electronic media submissions database on a non-transitory medium, for example multimedia content pertaining to building a personalized page (*e.g.*, publisher page

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or developer page) on the Accused Instrumentality, as well as multimedia content pertaining to published video game titles. Individual developers/publishers can sign up and create a developer/publisher page and publish video game titles on Valve Corp's Accused Instrumentality, which are stored on a user database. Such user database is stored in memory available through the Accused Instrumentality, for example as discussed above. The user attributes contained on the user database, may include, *e.g.*, special features of interest to users such as "free to play," "early access," "demons" and the like, as well as genre, platform, and tags, such as is shown, for example, in the examples below. Valve's Accused Instrumentality's retrieval of electronic media with associated photo content and textual content associated with the published video game titles from the electronic media submissions database uses an electronic content filter located on the one or more data processing apparatus. As can be seen below, such electronic content filter as is used by Valve is based at least in part on at least one of the one or more user attributes, (*e.g.*, based on, *inter alia*, special features of interest to users such as "free to play," "early access," "demons" and the like, as well as genre, platform and tags) which in turn affect which electronic media submissions, *e.g.*, published video game titles and associated media, appear to the user as shown and discussed for example below. Valve uses function-specific subsystems, for example as discussed below.

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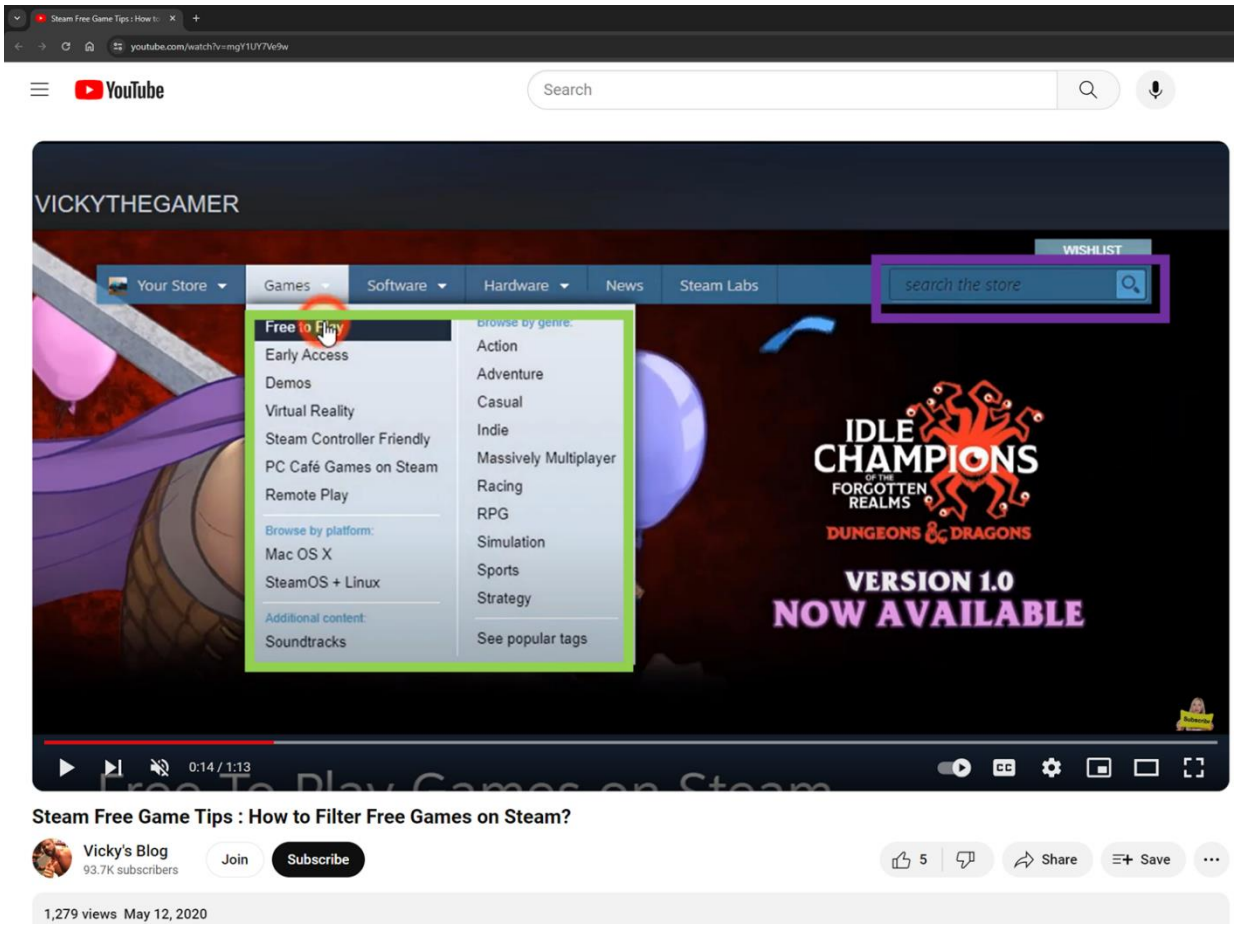

(*E.g.*, https://www.youtube.com/watch?v=mgY1UY7Ve9w).

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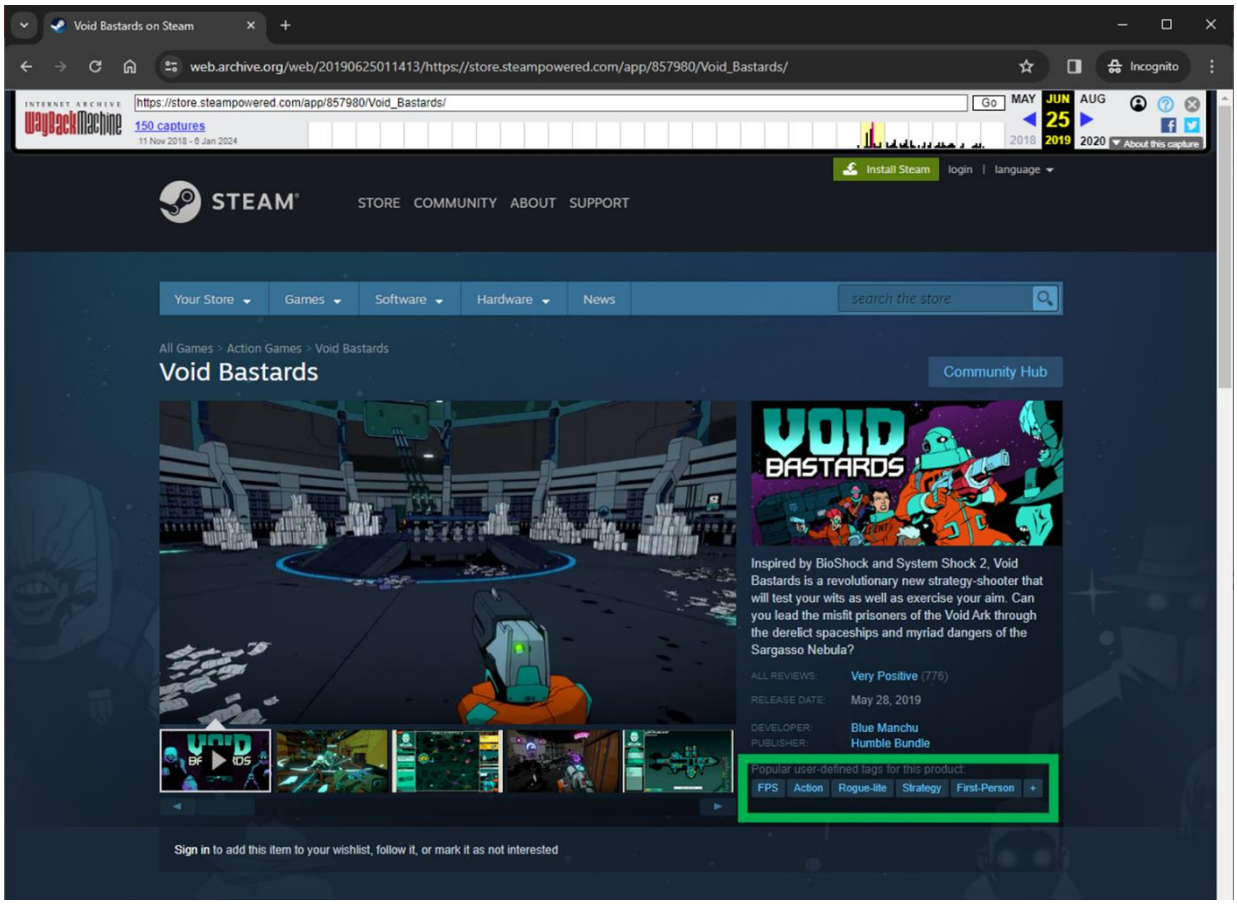

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

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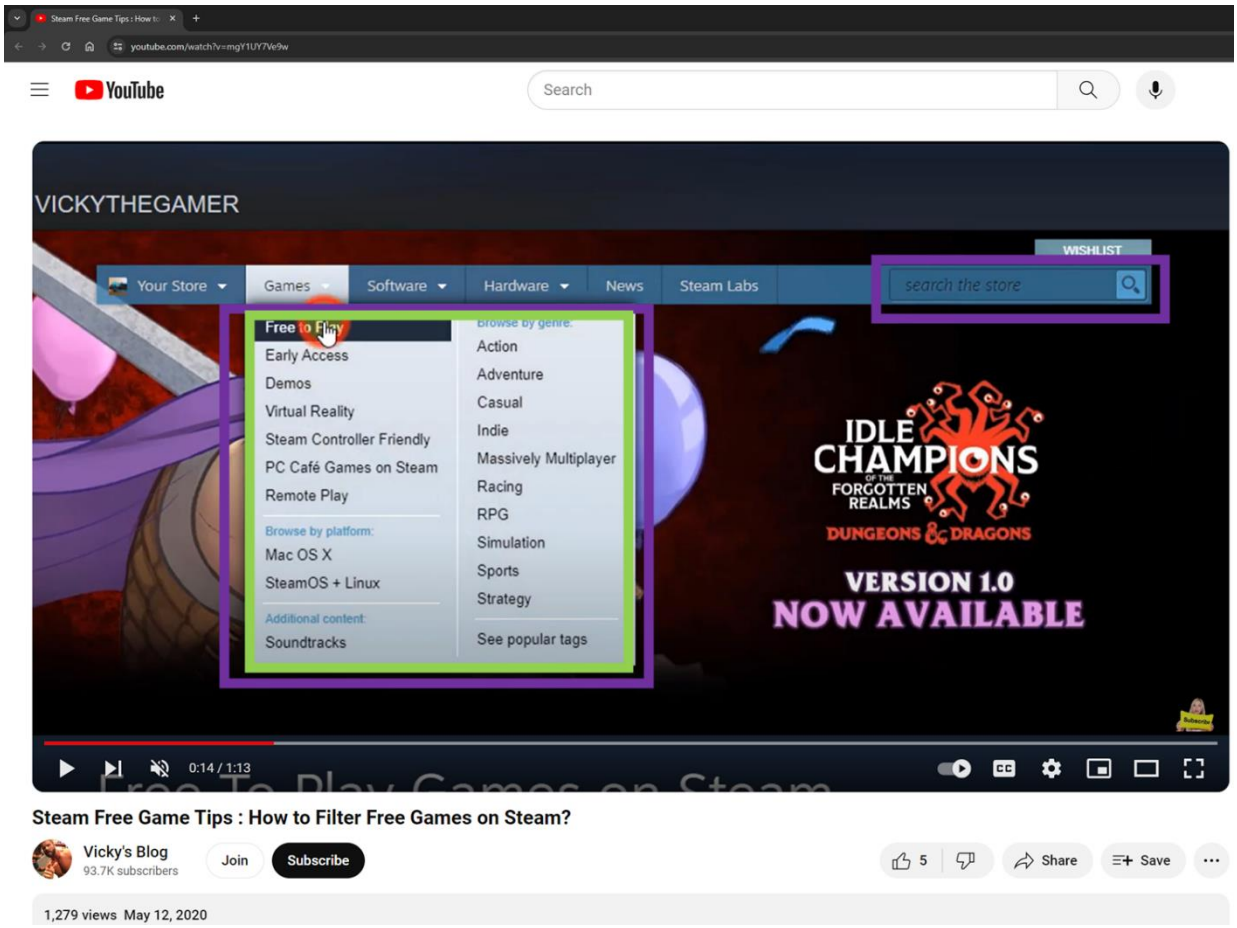

(*E.g.*, https://www.youtube.com/watch?v=mgY1UY7Ve9w).

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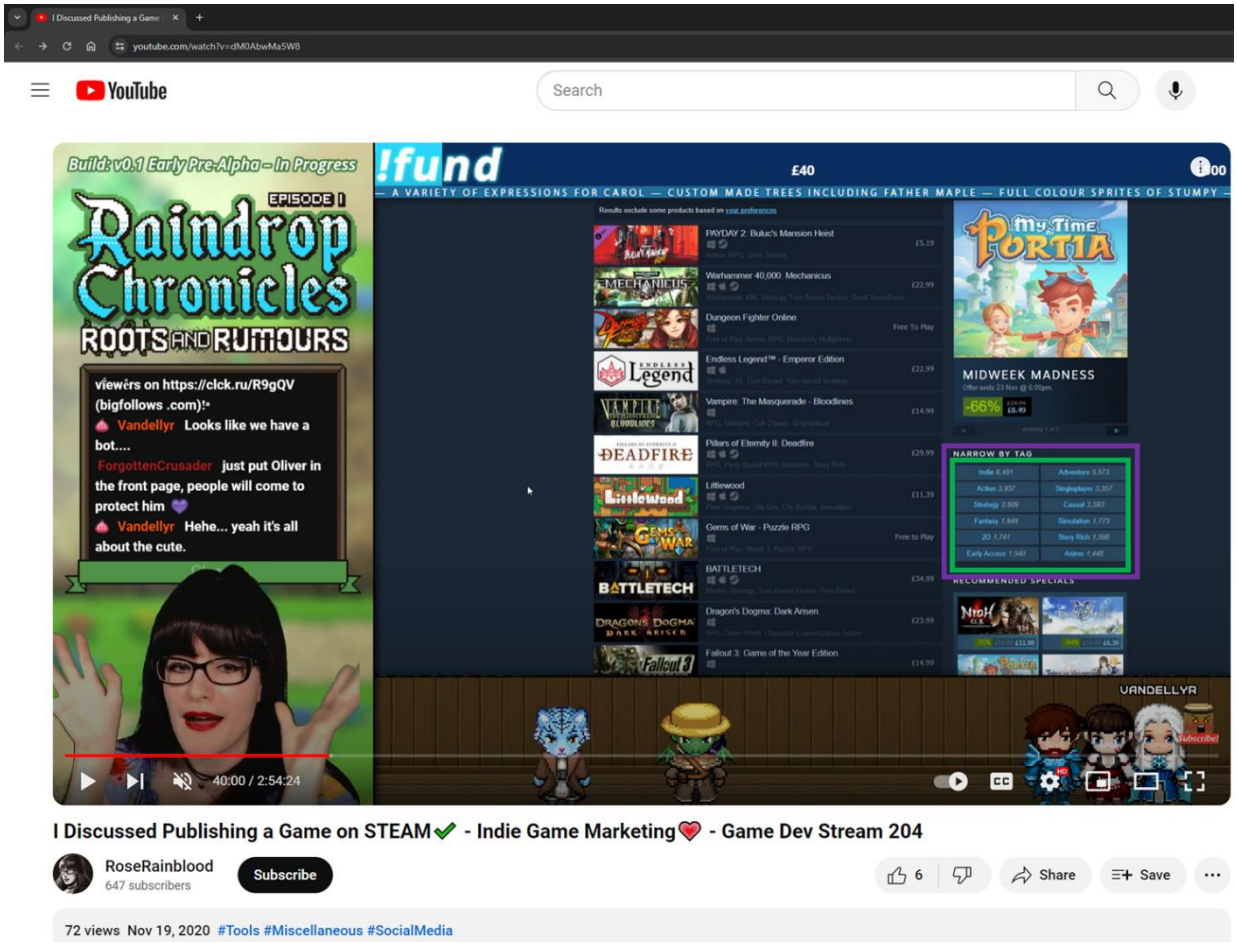

(*E.g.*, https://www.youtube.com/watch?v=dM0AbwMa5W8).

49. The Accused Instrumentality includes an electronic media submissions server subsystem, having one or more data processing apparatus and an electronic media submissions database stored on a non-transitory medium in order to process and store received submissions from a plurality of developers/publishers (submitters), for example content pertaining to their respective electronic media submission/video game title on the Accused Instrumentality, as well as multimedia content to be displayed on the developer/publisher page, as discussed and shown for example in connection with the above discussion. The submissions pertaining to building a developer/publisher page and to posting a video game title may include, *e.g.*, photo, video and/or textual content. The submissions are provided to the Accused Instrumentality via a submissions

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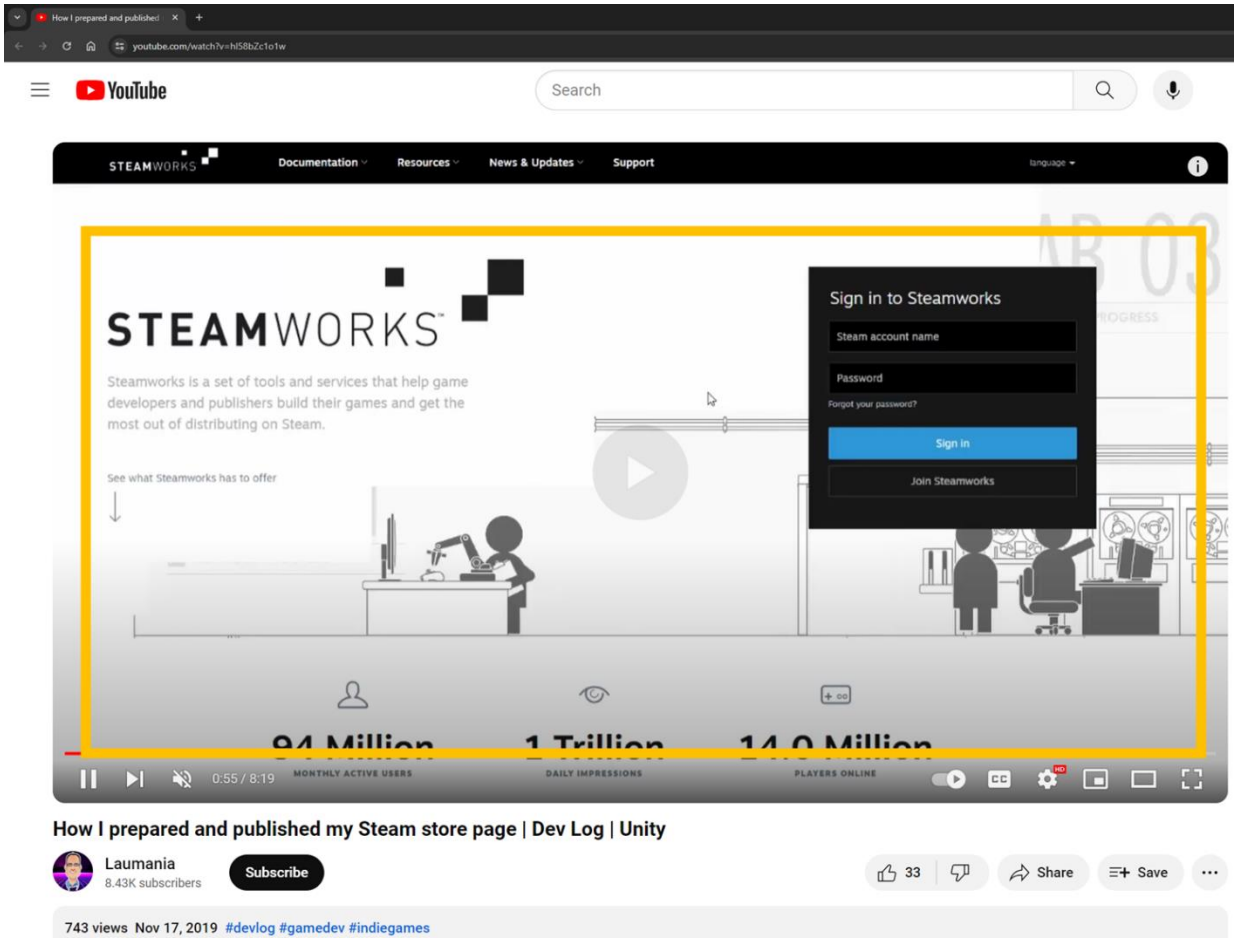
electronic interface, *e.g.*, a web-based content portal, accessible for example by logging in and selecting options to upload such content or import content, configured to receive such electronic media, from a plurality of submitters (*e.g.*, developers/publishers/users) over a public network (*e.g.*, the Internet) and stored, via an uploading process, in said electronic media submissions database for use in distribution to other users of the Accused Instrumentality.



(*E.g.*, https://www.youtube.com/watch?v=hI58bZc1o1w).

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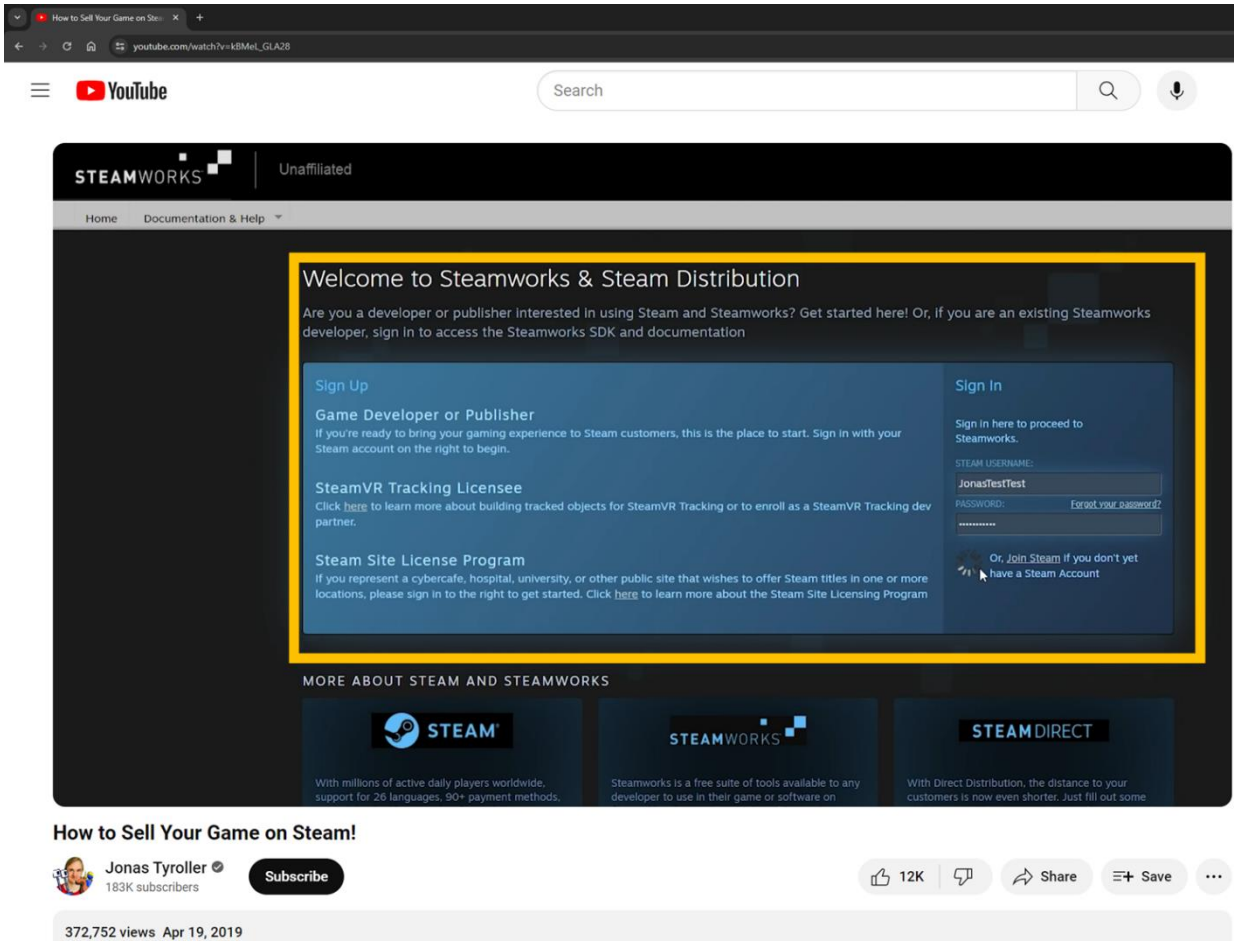

(*E.g.*, https://www.youtube.com/watch?v=kBMeL_GLA28).

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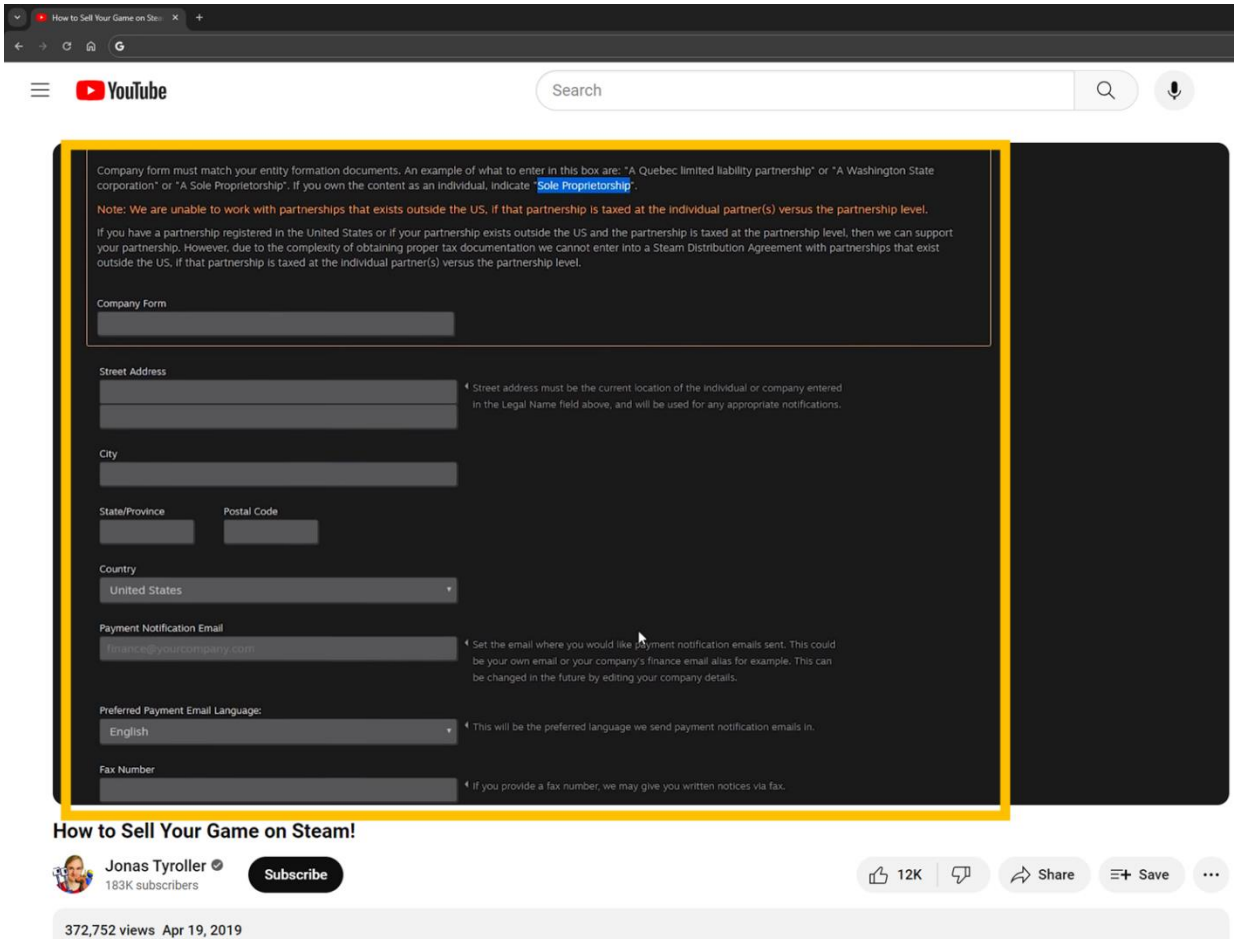

(*E.g.*, https://www.youtube.com/watch?v=kBMeL_GLA28).

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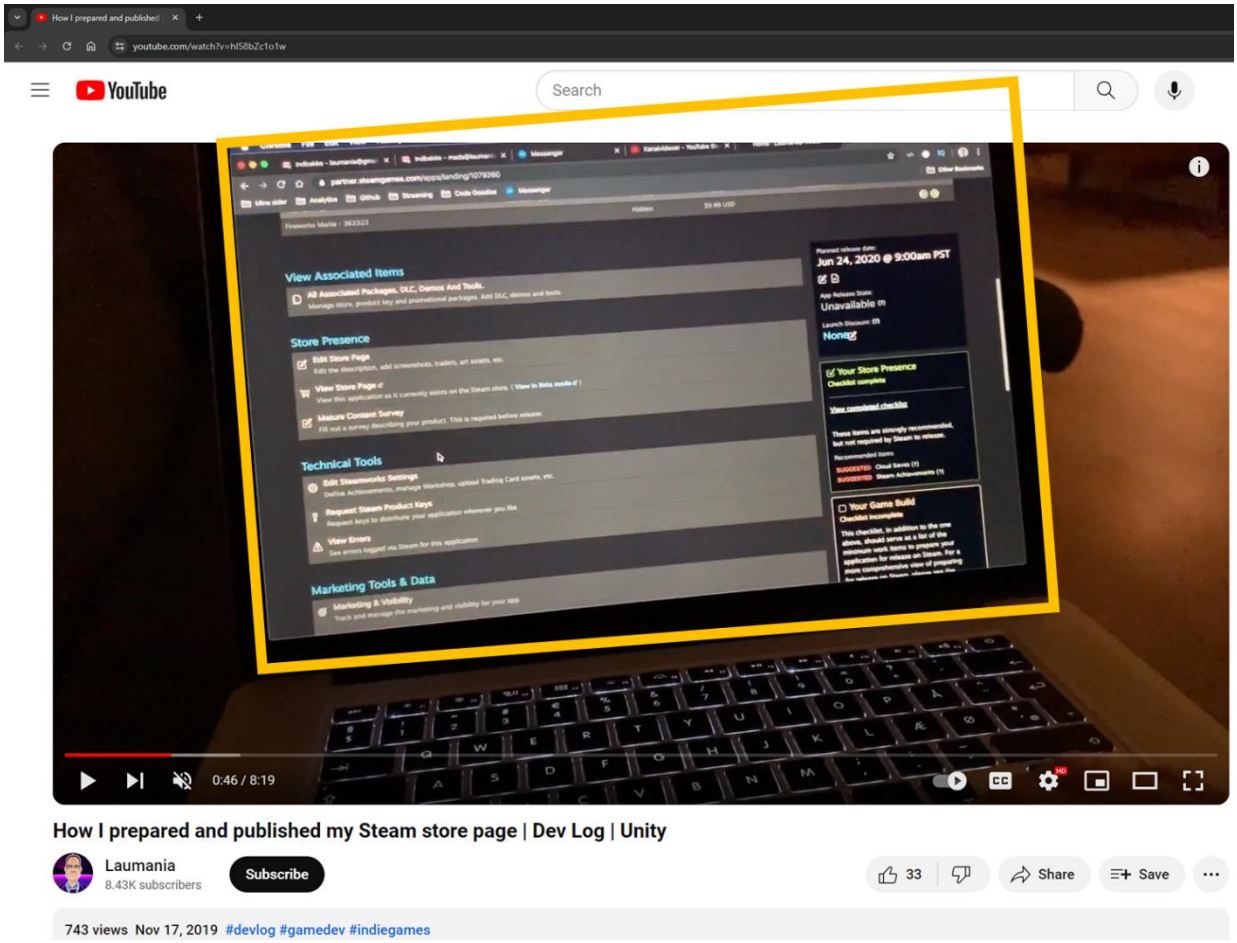

(*E.g.*, https://www.youtube.com/watch?v=hI58bZc1o1w).

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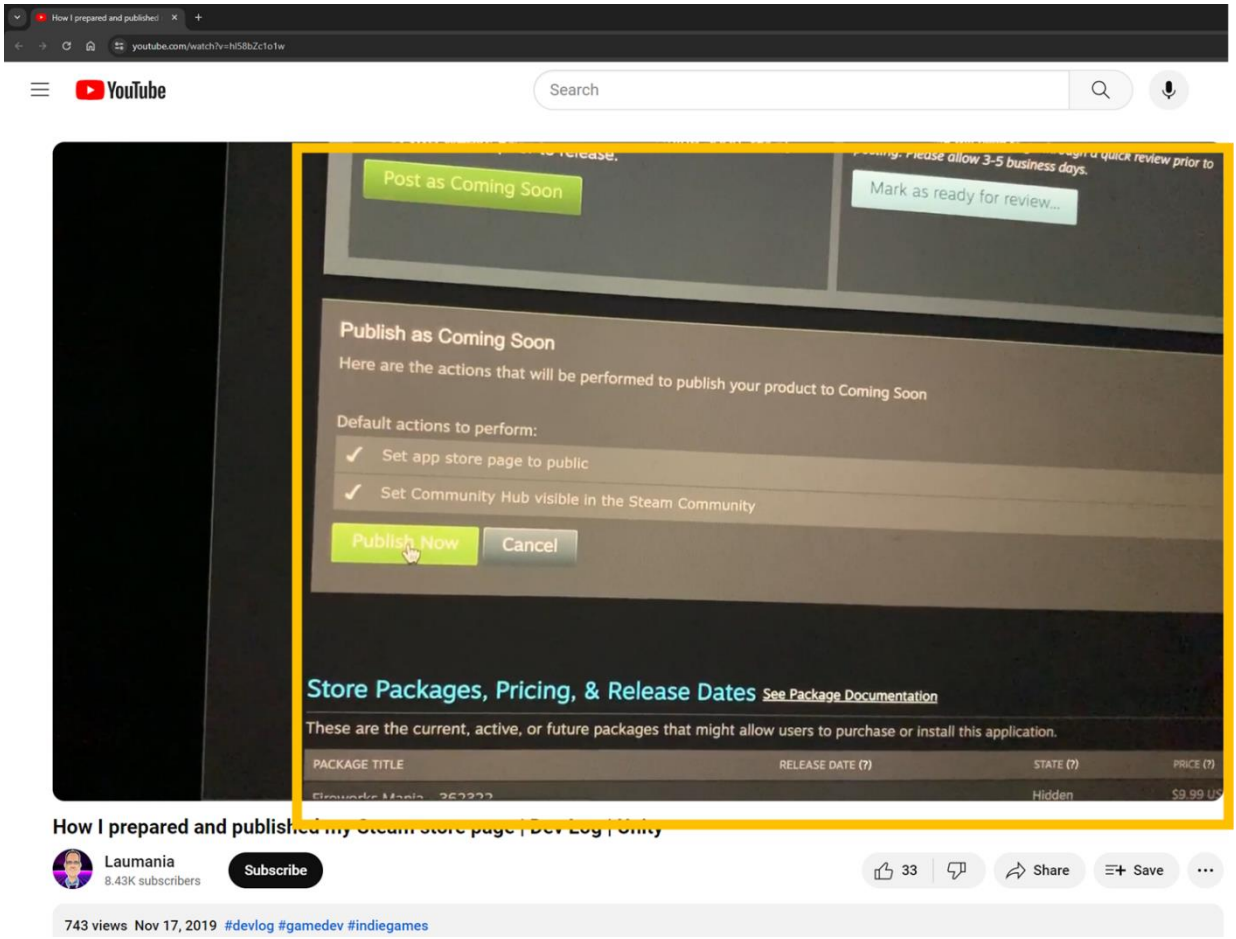

(*E.g.*, https://www.youtube.com/watch?v=hI58bZc1o1w).

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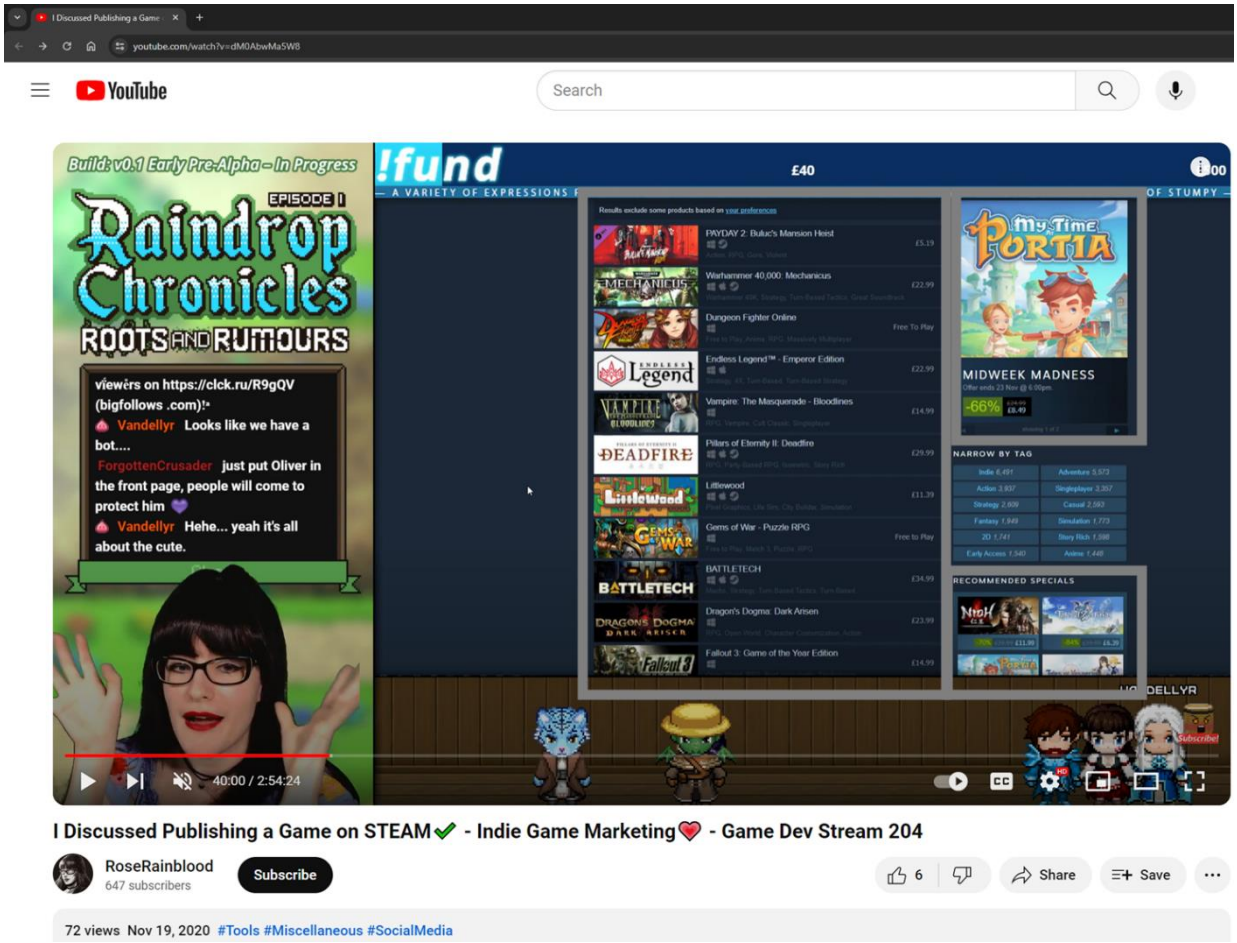

(*E.g.*, https://www.youtube.com/watch?v=dM0AbwMa5W8).

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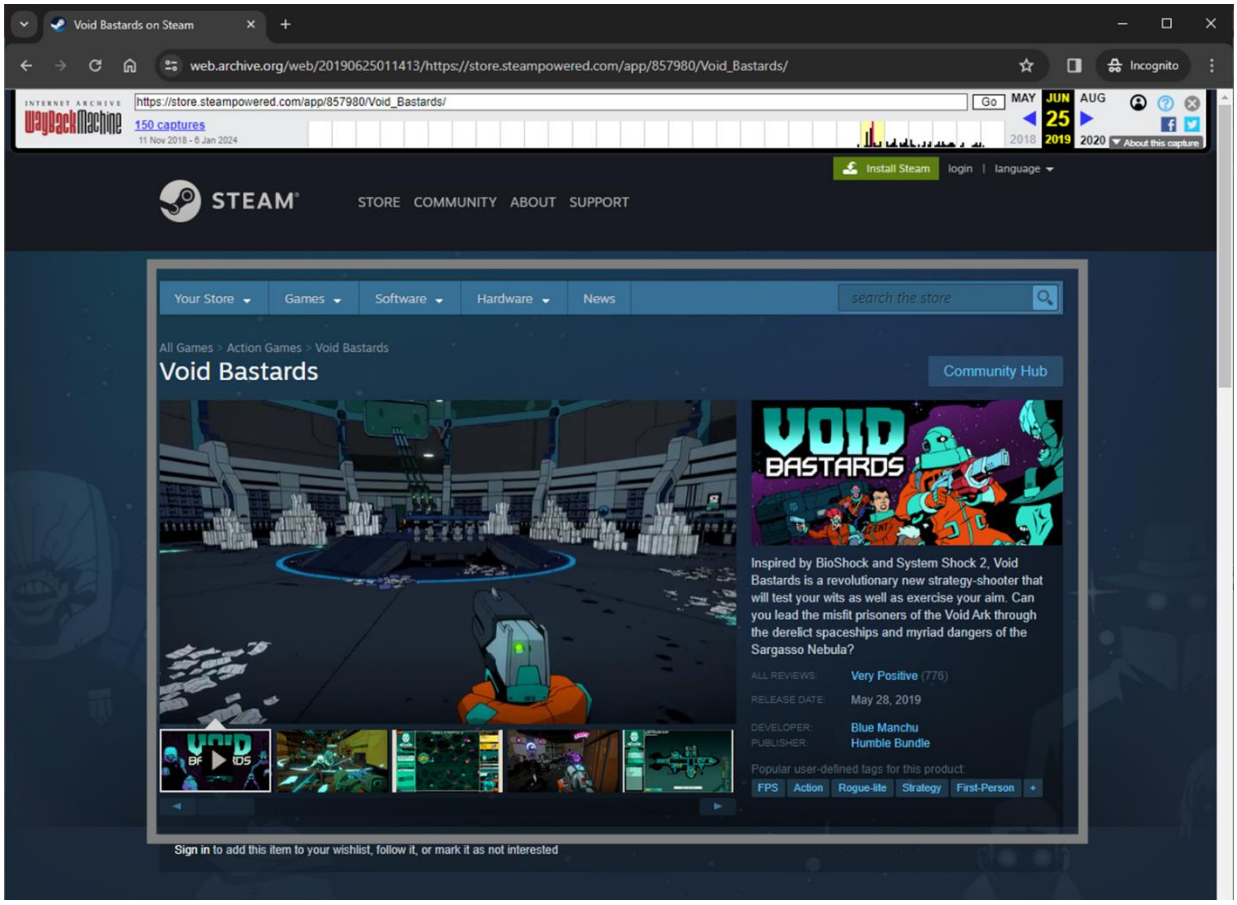

(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

50. The electronic media submissions database of the Accused Instrumentality used by Valve which stores the submissions further stores data identifying the submitter and data indicating content for each electronic media submission/video game title. As shown below, data identifying the developer/publisher (submitter) includes, *e.g.*, a name and a developer/publisher photo. Data indicating content for each electronic media submission includes photo and/or textual content.

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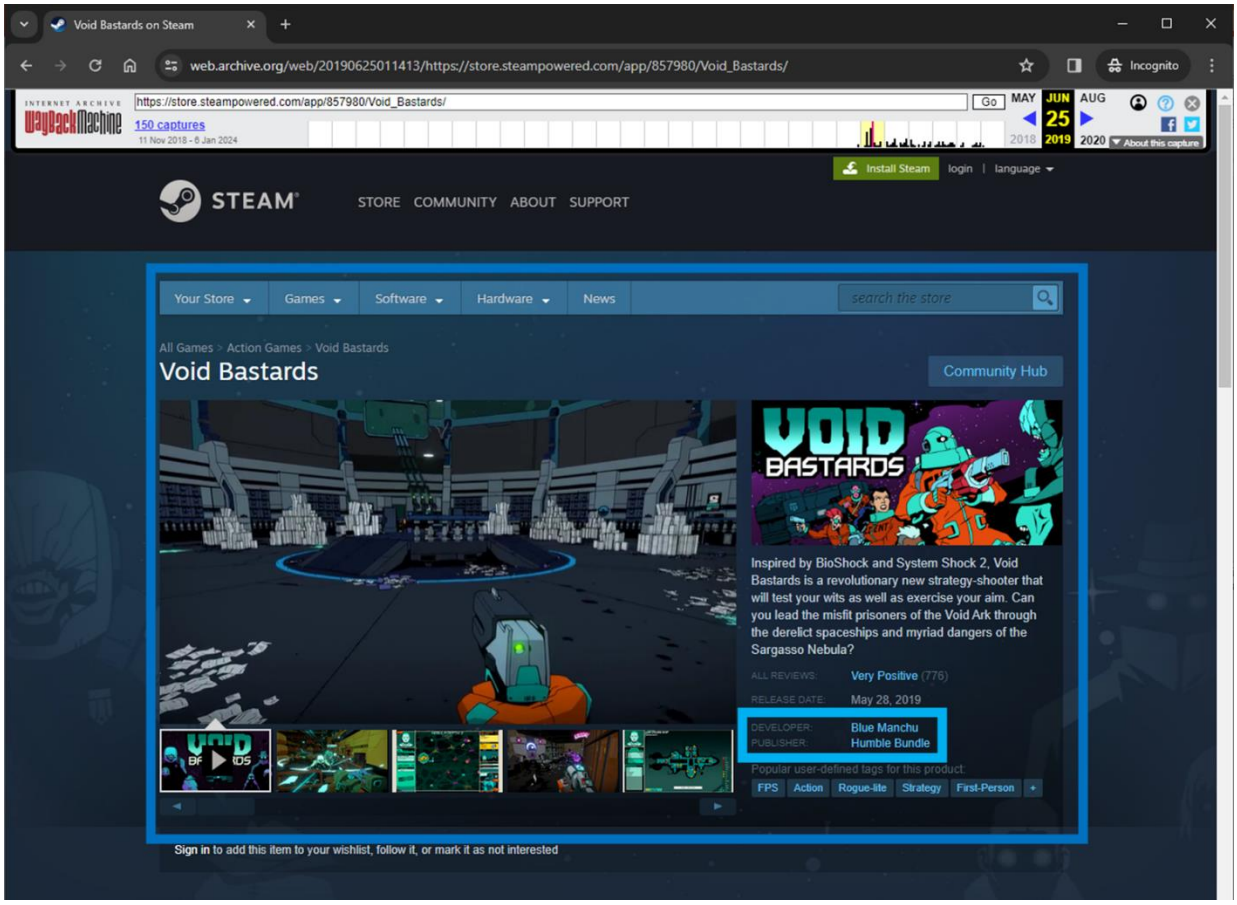

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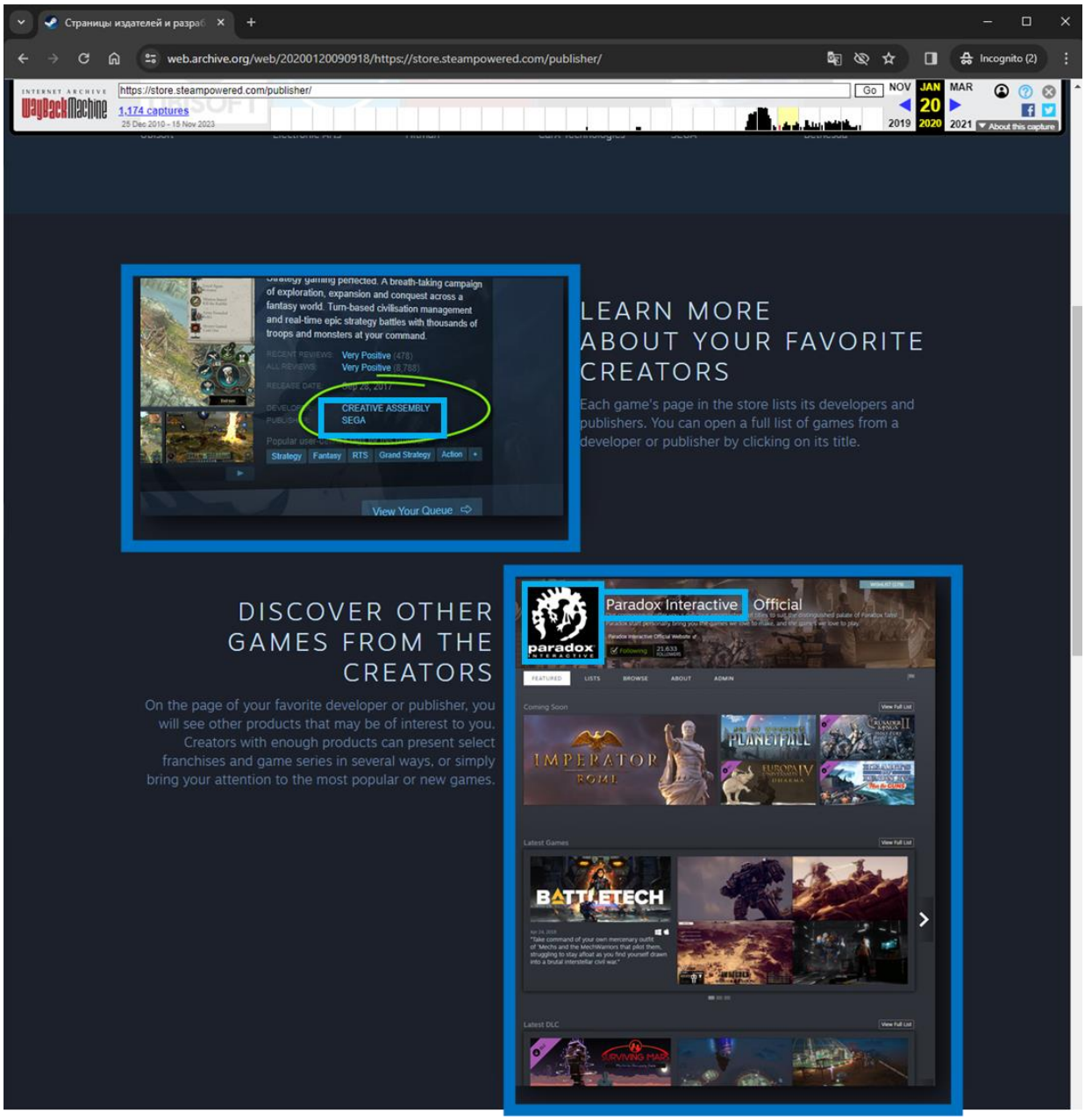

(*E.g.*, https://web.archive.org/web/20200120090918/https://store.steampowered.com/publisher/).

51. The Accused Instrumentality electronically generates multimedia files from the retrieved electronic media submissions, in accordance with a selected digital format (*e.g.*, a digital format compatible with a selected digital format compatible with the particular device such as a computers or smart phone incorporating one or more browsers or apps), and the

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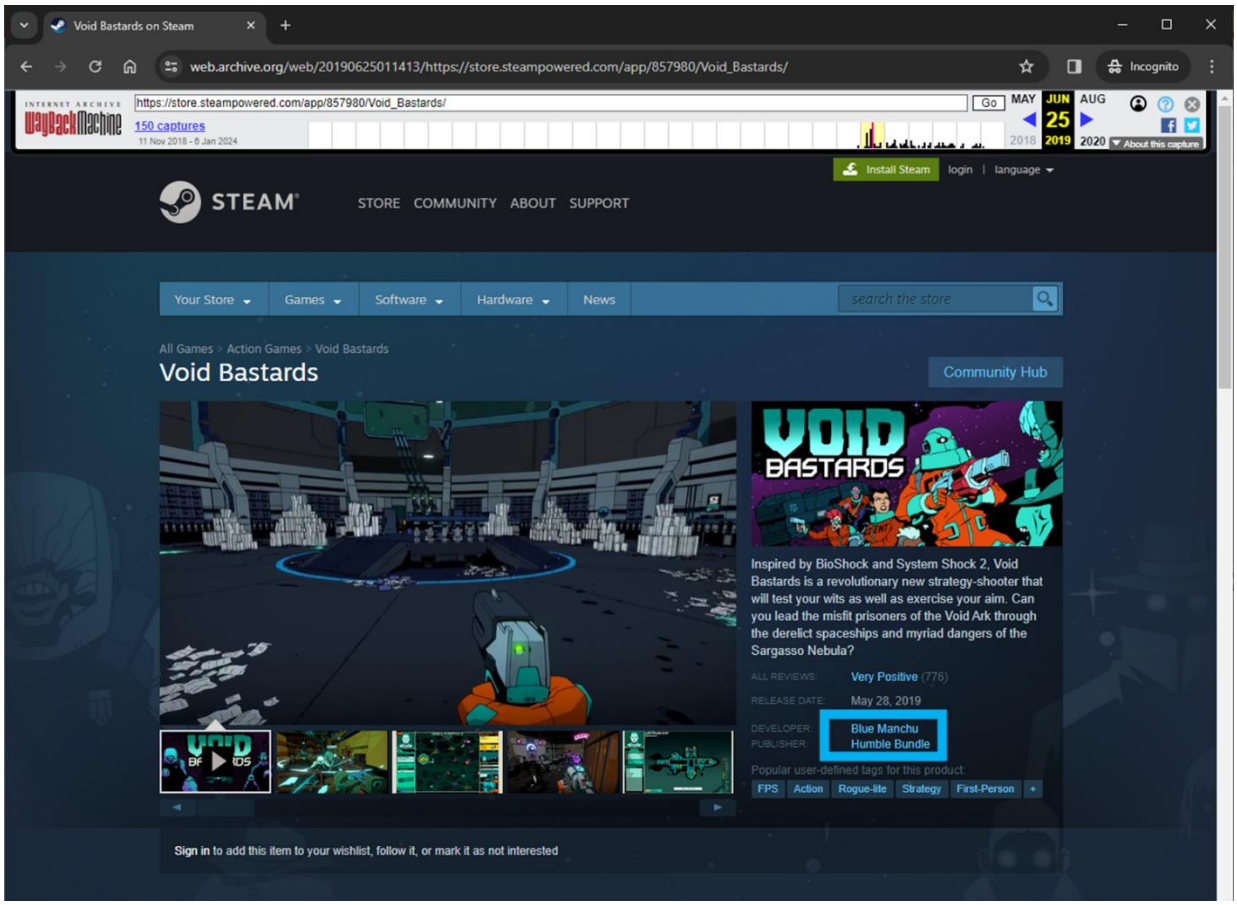
identification of the submitter is maintained with each retrieved submission within the multimedia file. As shown below, data identifying the developer/publisher (submitter) includes, *e.g.*, a name and developer/publisher picture.



(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

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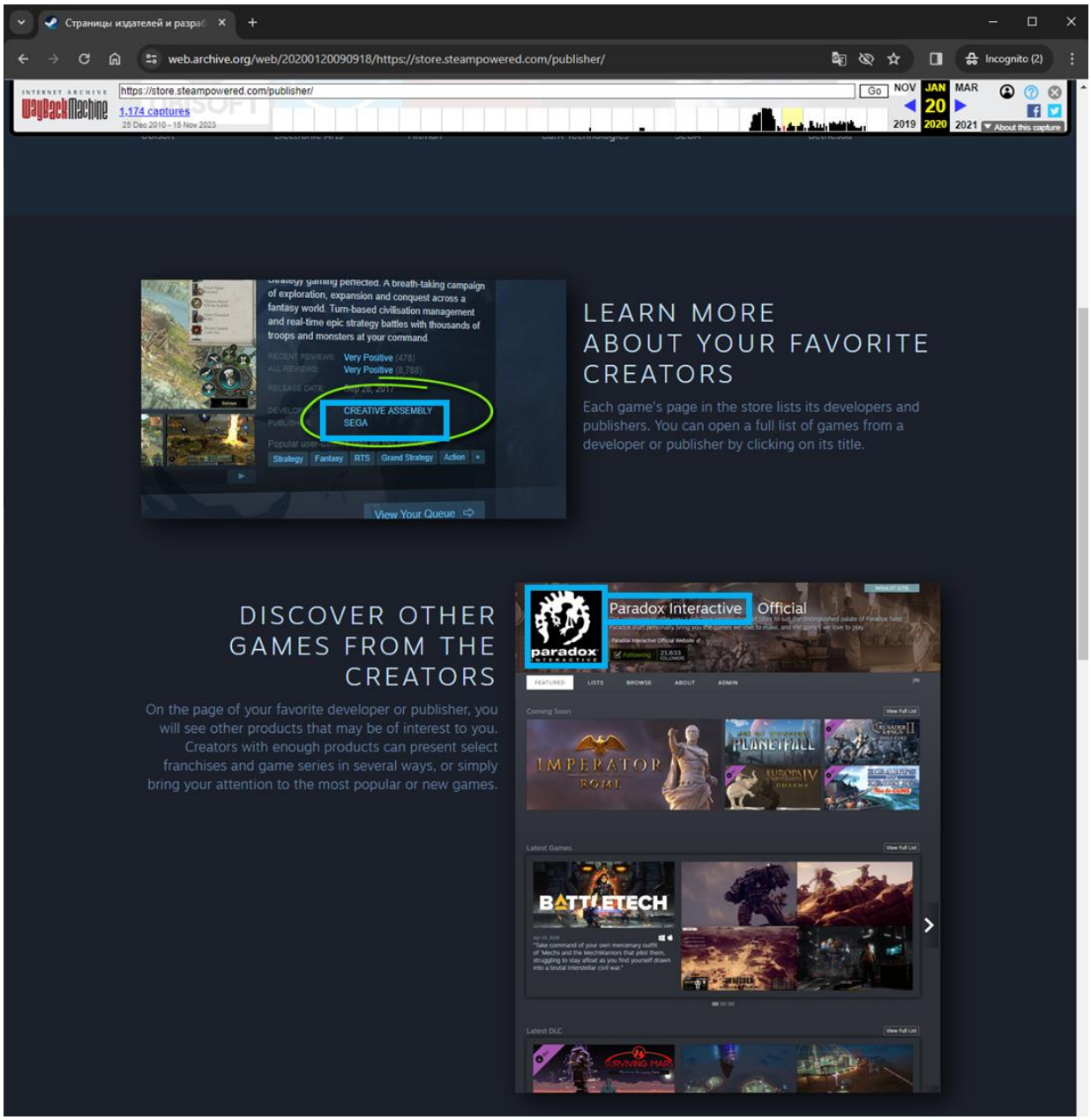

(*E.g.*, https://web.archive.org/web/20200120090918/https://store.steampowered.com/publisher/).

52. The Accused Instrumentality, in order to distribute its multimedia file to a geographically distributed userbase, electronically transmits the multimedia file to a plurality of publicly accessible webservers, so as to make electronically available multimedia page and/or video game title, with associated developer/publisher picture and textual content, to various users

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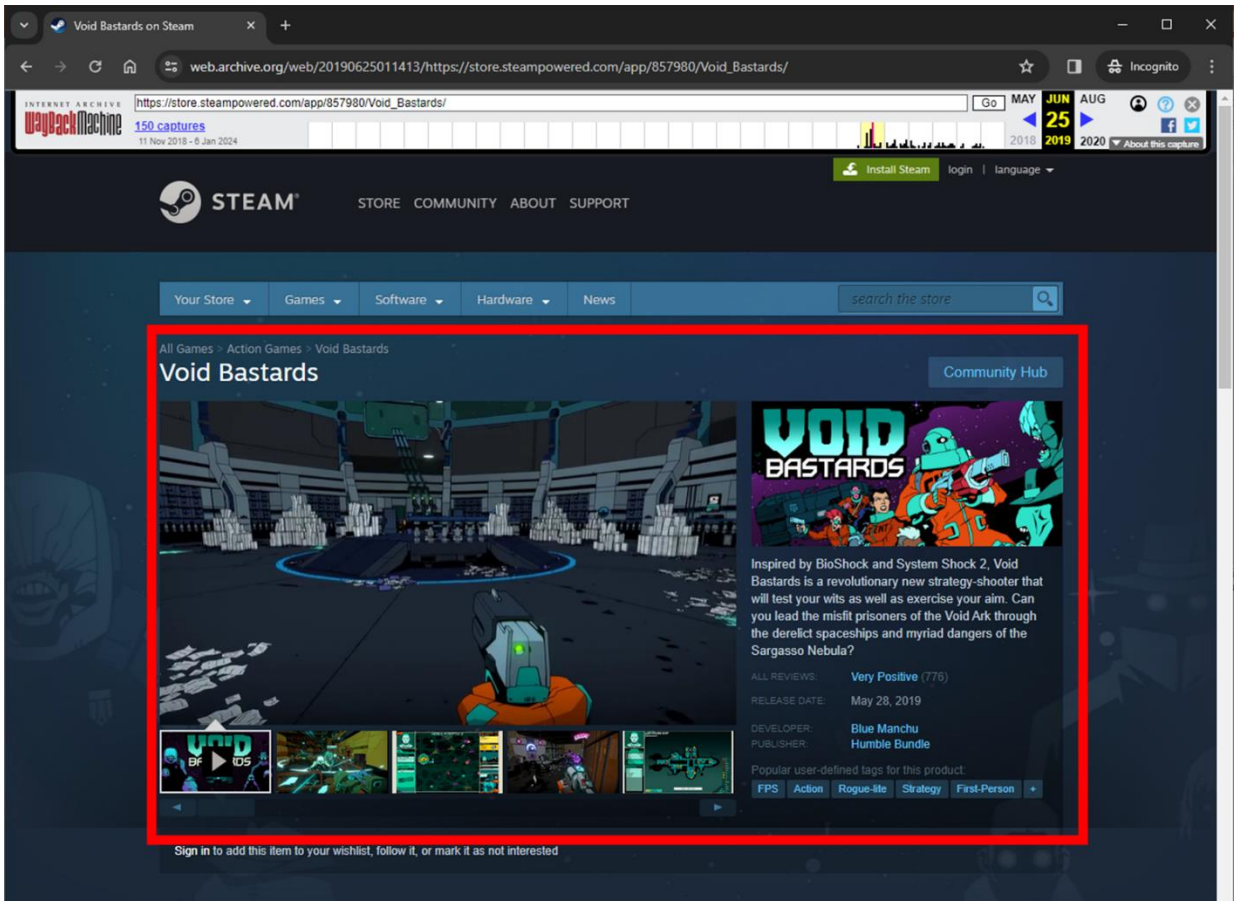
amongst a geographically distributed userbase, thereby making the multimedia file electronically available for viewing via a web-browser on one or more user devices over a public network (*e.g.*, the Internet). Valve uses function-specific subsystems, for example as discussed below.



(*E.g.*, https://web.archive.org/web/20190625011413/https://store.steampowered.com/app/857980/Void_Bastards/).

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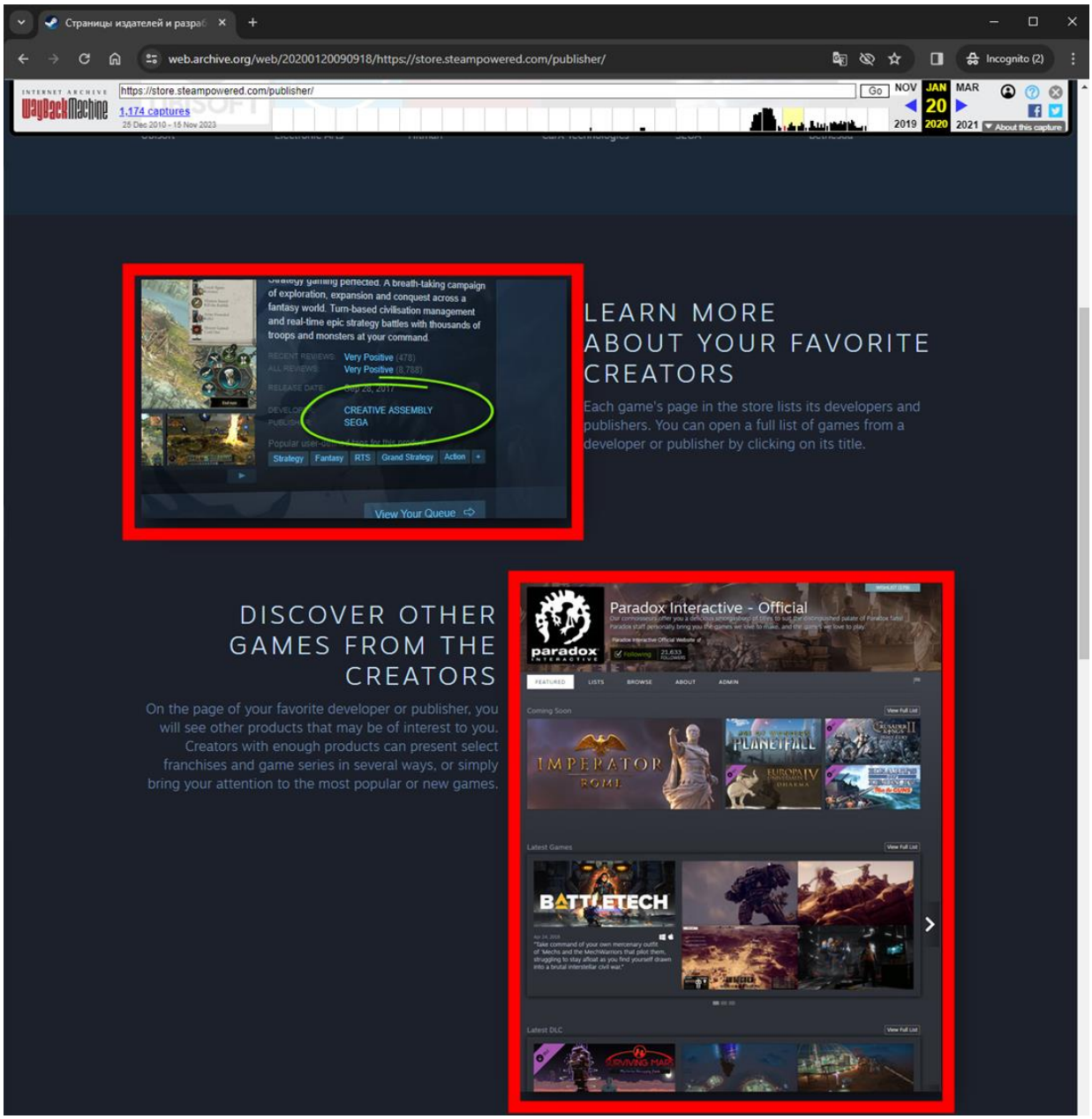

(*E.g.*, https://web.archive.org/web/20200120090918/https://store.steampowered.com/publisher/).

53. The Accused Instrumentality employs a web-based graphical user interface enabling its users to electronically access an electronic voting subsystem, enabling tracking of voting or electronic rating, configured to enable a user to electronically transmit data indicating a vote for or rating of (*e.g.*, by the user's choices with respect to a selection of one or more Stars

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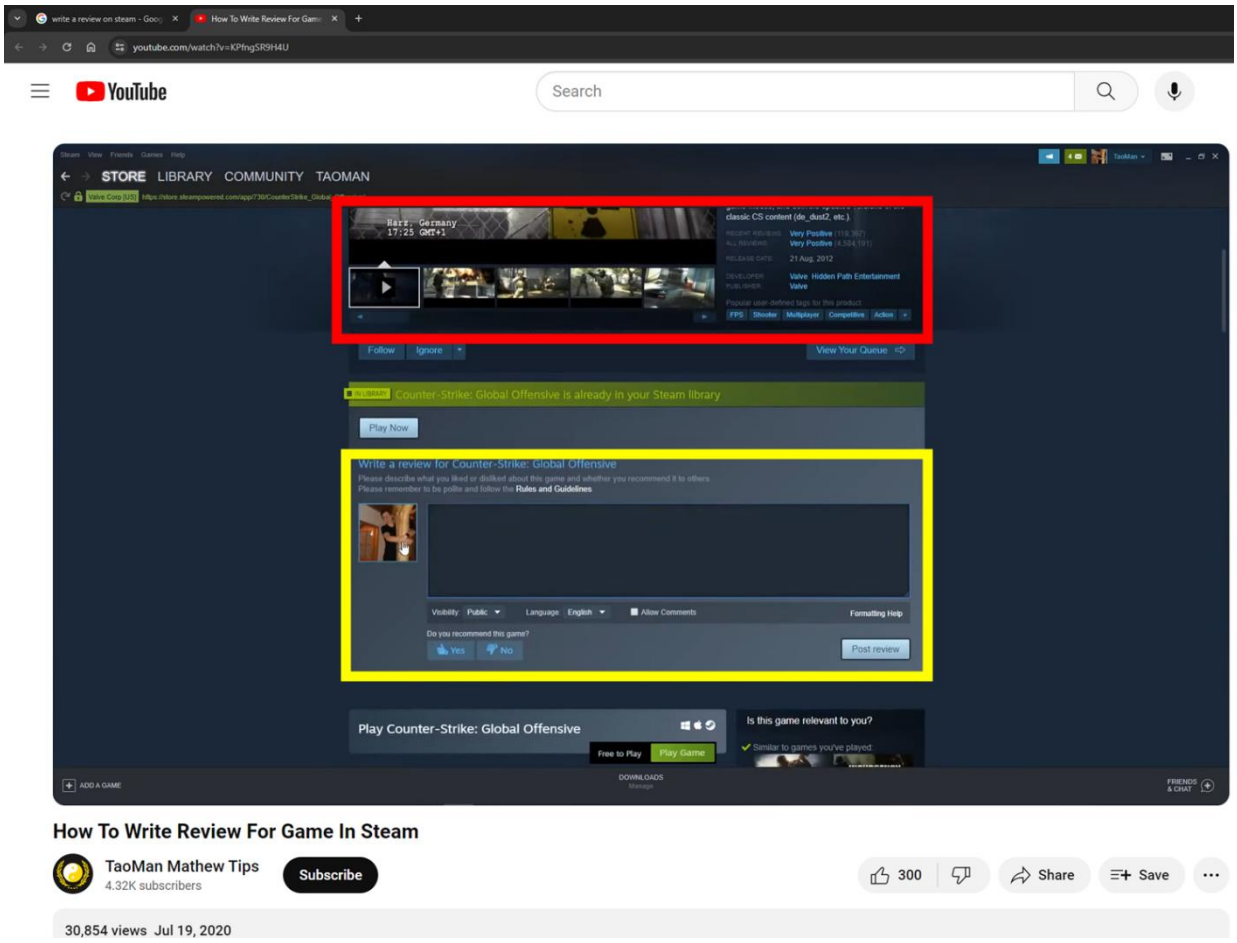
and textual content in the form of a Review) an electronically available content (*e.g.*, a multimedia video game title provided by a submitter, with accompanying photo, video and/or textual content). Valve uses function-specific subsystems, for example as discussed below.



(*E.g.* https://www.youtube.com/watch?v=KPfngSR9H4U).

54. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '665 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

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55. On information and belief, to the extent marking is required, VCA has complied with all marking requirements.

VI. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

a. Judgment that one or more claims of United States Patent No. 9,501,480 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;

b. Judgment that one or more claims of United States Patent No. 9,477,665 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;

c. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;

d. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and

e. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

May 30, 2024

Respectfully Submitted,

By /s/*Philip P. Mann*

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Attorneys for Plaintiff Virtual Creative Artists, LLC

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on May 30, 2024, with a copy of this document via the Court's CM/ECF system pursuant to Local Rule LCR 5(b).

/s/*Philip P. Mann*
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