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Attorneys for Plaintiff
Hypermedia Navigation LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

HYPERMEDIA NAVIGATION LLC,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 4:18-CV-00670-HSG

**SECOND AMENDED AND
SUPPLEMENTAL COMPLAINT**

JURY TRIAL DEMANDED

SECOND AMENDED AND SUPPLEMENTAL COMPLAINT

This is an action for patent infringement in which Hypermedia Navigation LLC (“Hypermedia”) makes the following allegations against Microsoft Corporation (“Defendant”):

PARTIES

1. Hypermedia Navigation LLC is a Texas limited liability company with a principle place of business located at 5068 W. Plano Parkway, Suite 300, Plano, TX 75093.

1
2 radio programs, concert viewings, which were increasingly unorganized with virtually unlimited
3 number of choices, for example, searching for a content on the search term “President” in December
4 1998 on www.Facebook.com would yield non-linear results.

5 7. In 1998, one of the major search engines, Yahoo!’s search engine provided this
6 simple categorical home page with no media content navigation.
7

8 <http://www.yahoo.com:80/> Go JUL DEC JAN
9 1997 1998 2000

10 **YAHOO!** Today's News More Yahoo!

11 [Yahoo! Games](#) chess, hearts, spades [at the new](#) **Cordis STORE** [Yahoo! Travel](#) book a flight

12 Search options

13 [Yahoo! Mail](#) - free email account - use it from home, school, work

14 [Yellow Pages](#) - [People Search](#) - [Maps](#) - [Classifieds](#) - [Personals](#) - [Chat](#) - [Email](#)
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[Get Local](#) [Miami](#) - [Minneapolis / St. Paul](#) - [New York](#) - [S.F. Bay](#) - [Seattle](#) - [Wash D.C.](#)

32 Smart Shopping with

33 [How to Suggest a Site](#) - [Company Info](#) - [Openings at Yahoo!](#) - [Contributors](#) - [Yahoo! How-To](#)

1
2 8. Search results through browsers were lists of links with no linear navigation for
3 media elements such as videos, images, and/or audio files or websites, for example, a search result
4 for president would look like this in 1999:

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9. The Hypermedia patents solved this problem by creating a linear navigation resource program to navigate media elements by pulling multiple media elements from multiple hypermedia resources from multiple remote information nodes and provides them to the subscriber station through an interface which provides presentation of a media element and a linear navigation through a path of additional media elements. The inventive linear navigation resource program permits a user to view media content and filter search results from a plurality of websites without having to leave the website.

10. On June 3, 2008, United States Patent No. 7,383,323 (the “323 Patent”) was duly and legally issued by the United States Patent and Trademark Office for an invention titled “System

1
2 and Method for Creating and Navigating a Linear Hypermedia Resource Program.” A true and
3 correct copy of the ’323 patent is attached hereto as Exhibit A.

4 11. On June 3, 2008, United States Patent No. 7,383,324 (the “’324 Patent”) was duly
5 and legally issued by the United States Patent and Trademark Office for an invention titled “System
6 and Method for Creating and Navigating a Linear Hypermedia Resource Program.” A true and
7 correct copy of the ’324 patent is attached hereto as Exhibit B.

8
9 12. On September 9, 2008, United States Patent No. 7,424,523 (the “’523 Patent”) was
10 duly and legally issued by the United States Patent and Trademark Office for an invention titled
11 “System and Method for Creating and Navigating a Linear Hypermedia Resource Program.” A true
12 and correct copy of the ’523 patent is attached hereto as Exhibit C.

13 13. On January 13, 2009, United States Patent No. 7,478,144 (the “’144 Patent”) was
14 duly and legally issued by the United States Patent and Trademark Office for an invention titled
15 “System and Method for Creating and Navigating a Linear Hypermedia Resource Program.” A true
16 and correct copy of the ’144 patent is attached hereto as Exhibit D.

17
18 14. On August 3, 2010, United States Patent No. 7,769,830 (the “’830 Patent”) was duly
19 and legally issued by the United States Patent and Trademark Office for an invention titled “System
20 and Method for Creating and Navigating a Linear Hypermedia Resource Program.” A true and
21 correct copy of the ’830 patent is attached hereto as Exhibit E.

22 15. On August 21, 2012, United States Patent No. 8,250,173 (the “’173 Patent”) was
23 duly and legally issued by the United States Patent and Trademark Office for an invention titled
24 “System and Method for Creating and Navigating a Linear Hypermedia Resource Program.” A true
25 and correct copy of the ’173 patent is attached hereto as Exhibit F.

26
27 16. On July 14, 2015, United States Patent No. 9,083,672 (the “’672 Patent”) was duly
28 and legally issued by the United States Patent and Trademark Office for an invention titled “System

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