

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NETSOC, LLC,)	
Plaintiff,)	
)	Civil Action No. 1:18-cv-10262
v.)	
)	
CHEGG INC.)	JURY TRIAL DEMANDED
Defendant.)	

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

NetSoc, LLC ("NetSoc") files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent No. 9,978,107 by Chegg Inc., alleging as follows:

I. THE PARTIES

1. Plaintiff NetSoc is a Texas Limited Liability Company with its principal place of business located in Harris County, Texas.

2. On information and belief, Chegg Inc. ("Chegg") is a domestic corporation organized and existing under the laws of Delaware, with a principal place of business located in New York, New York. Chegg may be served through its registered agent at Corporation Service Company, 80 State Street, Albany, New York 12207-2541. On information and belief, Chegg sells and offers to sell products and services throughout New York, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in New York and this judicial district.

II. JURISDICTION AND VENUE

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court also has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. § 1332(a)(1) because Plaintiff is a limited liability company organized under the laws of the State of Texas and Defendant is a Delaware Corporation with a physical place of business located in New York, New York. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of New York and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of New York and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of New York and in this judicial district.

6. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and has a regular and established place of business in this District.¹ Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or

¹ Chegg, Inc. advertises for employees within zipcode 10016 and maintains on its website and in its SEC filings at chegg.com that it has an office in New York, New York.

deriving substantial revenue from goods and services provided to individuals in New York and this District.

III. INFRINGEMENT ('107 Patent)

7. On May 22, 2018, U.S. Patent No. 9,978,107 (“the ‘107 patent”, attached as Exhibit A) entitled “Method and System for Establishing and Using a Social Network to Facilitate People in Life Issues” was duly and legally issued by the U.S. Patent and Trademark Office. NetSoc, LLC owns the ‘107 patent by assignment.

8. The ‘107 patent relates generally to a method and system for establishing and using a social network to facilitate people in life issues.

A. Defendant

9. Chegg maintains, operates, and administers a website at www.chegg.com that infringes one or more claims of the ‘107 patent, including at least claims 1-11, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the ‘107 Patent into service (i.e., used them); but for Defendant’s actions, the claimed-inventions embodiments involving Defendant’s products and services would never have been put into service. Defendant’s acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant’s procurement of monetary and commercial benefit from it.

10. Support for the allegations of infringement may be found in the following preliminary table:

Claim 6	Accused Product (or Service)
<p>6. A computer system comprising:</p>	<p>Plaintiff contends that Chegg provides computer system that is, one or more servers or databases to provide Chegg Tutors service.</p>  <p>Attachment 1 (How Chegg Tutors works (Webpage, 2018)) at 1.</p>
<p>a memory to store a list comprising a plurality of participants, wherein each participant in the plurality of participants corresponds to one or more individuals, wherein the list also includes information associated with at least one of each participant or the one or more individuals that correspond to each participant;</p> <p>one or more processors that</p>	<p>Plaintiff contends that by using one or more servers or databases (which contain processors and memory), Chegg stores and maintains data of one or more participants or individuals along with their information.</p>  <p>Attachment 1 (How Chegg Tutors works (Webpage, 2018)) at 1.</p>

execute instructions
to:
maintain the list;

FILTER BY






☐ Ready to teach now!
☐ Online

KEYWORDS
e.g. Stanford, piano, James

ADDITIONAL SUBJECTS
Choose subject(s)





GENDER
☒ No preference
☐ Male
☐ Female

Showing 1-10 of thousands of results (34 online)

	Raj K. Programming tutor Birla Institute of Technology and Science, Pilani – Goa Campus 2016 - Engl... "I am currently a 4th year UG student pursuing a 4 year integrated M.Sc. (Hons.) Physics programme with an intensive focus on..."	51
	Harjoben S. Programming tutor Nanyang Technological University, Singapore 2013 - Computer Engineering "I tutored 8th to 10th grade students in Physics, Maths and Java programming along with my undergraduate studies for two years..."	37
	Arfat S. Programming tutor University of Delhi 2017 - Computer Science "I have taken various live and written lessons. I am able to clearly communicate various computer science concepts efficiently..."	103
	Soumith R. Programming tutor VIT University, Vellore 2017 - Electronics and communication "I have enjoyed tutoring my juniors at college in the courses and also mentored them during projects. I have also been a part..."	1
	Zohreh E. Programming tutor Islamic Azad University 2008 - Computer and Electronic engineering "I hold a Computer and Electronic Engineering B.sc and M.sc from the Islamic Azad University in Iran. I have completed my PhD..."	110

Attachment 2 (Find a Programming tutor (Webpage, 2018))

Chegg stores and maintains data of plurality of candidates or participants along with their information.

Raj K.    51  4 (92% positive)

Birla Institute of Technology and Science, Pilani – Goa Campus, Class of 2016
Engineering & Science
Tutors live lessons

Subjects tutored: ACT Math, ACT Science, Algebra, Applied Mathematics, Astronomy, Basic Math, Basic Science, Calculus, Chemistry, College Admissions, Computer Science, English as a Second Language, Geometry, LaTeX, Linear Algebra, Physics, Pre-Algebra, Pre-Calculus, SAT II Mathematics Level 1, SAT II Physics, SAT Math, and Trigonometry

About Reviews Subject expertise

TEACHING EXPERIENCE
I am currently a 4th year UG student pursuing a 4 year integrated M.Sc. (Hons.) Physics programme with an intensive focus on theoretical physics at BITS, Pilani -- a university with a 1.4% acceptance rate. I am currently pursuing my Master's thesis at HRI, Allahabad on inflationary cosmology. Since 2008, I have been involved in popularizing Astronomy and the Physical Sciences. Before joining college, I co-founded and headed an organization called

Send Raj a message
Let Raj know what you'd like help with and when to ensure you get your ideal lesson.
Send message

LIKELIHOOD OF REPLY
90%+

EXPECTED RESPONSE TIME
< 5 min

Frequently Asked Questions

- + How do lessons work?
- + Who are Chegg's tutors?
- + How much does tutoring cost?
- + How do I set up my first lesson?

Attachment 3 (Raj K. (Webpage, 2018)) at 1.

present a user with an interface from which the user makes a selection of a category

Plaintiff contends that by using Chegg Tutors service, user is presented with an interface for making a selection of a category from a plurality of categories.

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