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17 **IN THE UNITED STATES DISTRICT COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA
18 **OAKLAND DIVISION**

19 **HYPERMEDIA NAVIGATION LLC,**

20 Plaintiff,

21 v.

22 **FACEBOOK, INC.,**

23 Defendant.
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Case No. 4:17-cv-5383-HSG
AMENDED COMPLAINT
DEMAND FOR JURY TRIAL

AMENDED COMPLAINT
4:17-CV-5358-HSG

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AMENDED COMPLAINT

This is an action for patent infringement in which Hypermedia Navigation LLC (“Hypermedia”) makes the following allegations against Facebook, Inc. (“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.

2. Facebook, Inc., is a corporation organized and existing under the laws of Delaware, with its principal place of business located at 1601 Willow Road, Menlo Park, CA 94025. Defendant may be served with process through its registered agent: The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

JURISDICTION AND VENUE

3. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271(a), 281, and 284 - 85. This Court has subject matter jurisdiction over this action under 28 U.S.C. §1331 and §1338(a).

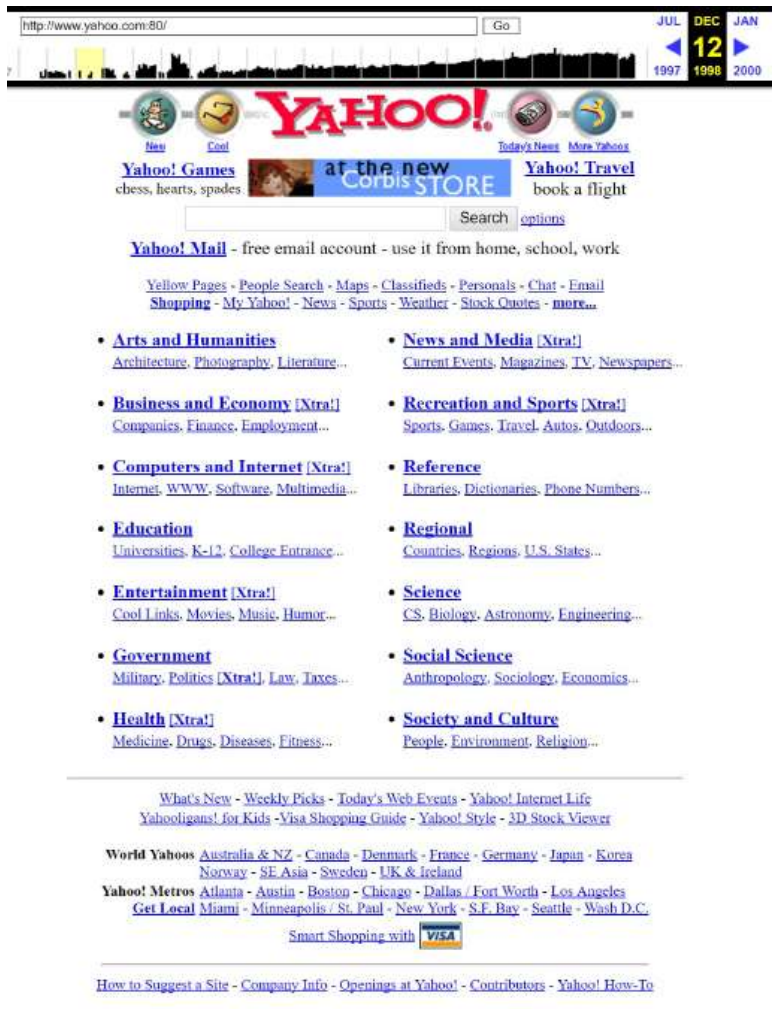
4. Venue is proper in this district pursuant to 28 U.S.C. § 1400(b). Defendant has a regular place of business in this district at 1601 Willow Road, Menlo Park, CA 94025, and has committed acts of patent infringement in this district.

5. Defendant is subject to this Court’s specific and general personal jurisdiction pursuant to due process and/or the California Long Arm Statute, due at least to Defendant’s substantial business in this forum, 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 deriving substantial revenue from goods and services provided to individuals in California and in this district.

THE ASSERTED PATENTS

6. The Hypermedia Patents disclose the solution to a problem created by internet web navigation which lacked linear navigation for media elements such as television shows, movies, radio programs, concert viewings, which were increasingly unorganized with virtually unlimited number of choices, for example, searching for a content on the search term “President” in December 1998 on www.Facebook.com would yield non-linear results.

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



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



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.

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

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

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

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

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

18 15. On August 21, 2012, United States Patent No. 8,250,173 (the “’173 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 correct
21 copy of the ’173 patent is attached hereto as Exhibit F.

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