

1 Susan S.Q. Kalra (CA State Bar No. 16740)  
Email: skalra@rameyfirm.com  
2 RAMEY LLP  
5020 Montrose Blvd., Suite 800  
3 Houston, Texas 77006  
Telephone: (800) 993-7499  
4 Fax: (832) 900-4941

5 William P. Ramey, III (*pro hac vice anticipated*)  
Texas Bar No. 24027643  
6 RAMEY LLP  
Email: wramey@rameyfirm.com  
7 5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
8 (713) 426-3923 (telephone)  
(832) 900-4941 (fax)  
9

10 *Attorneys for Plaintiff*  
**STREET SPIRIT IP LLC**

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

14  
15 STREET SPIRIT IP LLC,  
Plaintiff,  
16 v.  
17 META PLATFORMS, INC. AND  
FACEBOOK, INC.  
18 Defendant.  
19

Case No.:  
**PLAINTIFF’S ORIGINAL COMPLAINT  
FOR PATENT INFRINGEMENT**  
**(35 U.S.C. § 271)**  
**DEMAND FOR JURY TRIAL**

20  
21 Street Spirit IP LLC (“Street Spirit”) files this Original Complaint and demand for jury trial  
22 seeking relief from patent infringement of the claims of U.S. Patent No. 9,282,090 (“the ’090  
23 patent”) (referred to as the “Patent-in-Suit”) by Meta Platforms, Inc. and Facebook, Inc.  
24 (“Defendant” or “Facebook”).  
25  
26  
27  
28

1       **I.       THE PARTIES**

2           1.       Street Spirit IP LLC is a Texas Limited Liability Company with its principal place  
3 of business located in Travis County, Texas.

4           2.       On information and belief, Facebook is a corporation organized under the laws of the  
5 State of Delaware with a principal place of business at 1 Hacker Way, Bldg. 10, Menlo Park, CA  
6 94025.

7           3.       On information and belief, Facebook sells and offers to sell products and services  
8 throughout California, including in this judicial district, and introduces products and services that  
9 perform infringing methods or processes into the stream of commerce knowing that they would be  
10 sold in California and this judicial district. Facebook can be served with process through their  
11 registered agent, Corporation Service Company dba CSC - Lawyers Incorporating Service  
12 Company, 211 E. 7th Street, Suite 620, Austin, TX, 78701, or wherever they may be found.  
13  
14

15       **II.       JURISDICTION AND VENUE**

16           4.       This Court has original subject-matter jurisdiction over the entire action pursuant to  
17 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating  
18 to patents, namely, 35 U.S.C. § 271.

19           5.       This Court has personal jurisdiction over Defendant because: (i) Defendant is present  
20 within or has minimum contacts within the State of California and this judicial district; (ii)  
21 Defendant has purposefully availed itself of the privileges of conducting business in the State of  
22 California and in this judicial district; and (iii) Plaintiff's cause of action arises directly from  
23 Defendant's business contacts and other activities in the State of California and in this judicial  
24 district.  
25  
26  
27  
28

1           6.       Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant  
2 has committed acts of infringement and has a regular and established place of business in this  
3 District. Further, venue is proper because Defendant conducts substantial business in this forum,  
4 directly or through intermediaries, including: (i) at least a portion of the infringements alleged  
5 herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct  
6 and/or deriving substantial revenue from goods and services provided to individuals in California  
7 and this District.  
8

9           **III.    DIVISIONAL ASSIGNMENT**

10           7.       Pursuant to Civ. L.R. 3-2(c) and 3-5(b), this action involves intellectual property  
11 rights and will be assigned on a district-wide basis.  
12

13           **IV.    INFRINGEMENT**

14           **A.    Infringement of the '090 Patent**

15           8.       On March 8, 2016, U.S. Patent No. 9,282,090 (“the '090 patent”, attached as Exhibit  
16 A) entitled “Methods and systems for identity verification in a social network using ratings,” was  
17 duly and legally issued by the U.S. Patent and Trademark Office. Street Spirit IP LLC owns the  
18 '090 patent by assignment.

19           9.       The '090 patent relates to a novel and improved identity verification and  
20 management for a social network system.  
21

22           10.      Defendant maintains, operates, and administers systems, products, and services for  
23 enabling a method of providing customer relationship management for a network that infringes one  
24 or more claims of the '090 patent, including one or more of claims 1-28, literally or under the  
25 doctrine of equivalents. Defendant put the inventions claimed by the '090 Patent into service (i.e.,  
26 used them); but for Defendant’s actions, the claimed-inventions embodiments involving  
27  
28

1 Defendant's products and services would never have been put into service. Defendant's acts  
2 complained of herein caused those claimed-invention embodiments as a whole to perform, and  
3 Defendant's procurement of monetary and commercial benefit from it.

4           11. Support for the allegations of infringement may be found in the chart attached as  
5 exhibit B. These allegations of infringement are preliminary and are therefore subject to change.

6           12. Defendant has and continues to induce infringement. Defendant has actively  
7 encouraged or instructed others (e.g., its customers and/or the customers of its related companies),  
8 and continues to do so, on how to use its products and services (e.g., method of providing security  
9 against cybercrimes using an identification-secured network, the identification-secured network  
10 configured to provide security against Internet-related crimes including cyberstalking and cyber-  
11 bullying) and related services that provide question and answer services across the Internet such as  
12 to cause infringement of one or more of claims 1-28 of the '090 patent, literally or under the doctrine  
13 of equivalents. Defendant, from at least the filing date of the lawsuit, has continued to encourage  
14 and instruct others on how to use the products showing specific intent. Moreover, Defendant has  
15 known of the '090 patent and the technology underlying it from at least the issuance of the patent.

16           13. Defendant has and continues to contributorily infringe. Defendant has actively  
17 encouraged or instructed others (e.g., its customers and/or the customers of its related companies),  
18 and continues to do so, on how to use its products and services (e.g., method of providing security  
19 against cybercrimes using an identification-secured network, the identification-secured network  
20 configured to provide security against Internet-related crimes including cyberstalking and cyber-  
21 bullying) and related services that provide question and answer services across the Internet such as  
22 to cause infringement of one or more of claims 1-28 of the '090 patent, literally or under the doctrine  
23 of equivalents. Defendant, from at least the filing date of the lawsuit, has continued to encourage  
24 and instruct others on how to use the products showing specific intent. Moreover, Defendant has  
25 known of the '090 patent and the technology underlying it from at least the issuance of the patent.

1 and instruct others on how to use the products showing specific intent. Moreover, Defendant has  
2 known of the '090 patent and the technology underlying it from at least the issuance of the patent.

3 14. Defendant has caused and will continue to cause Plaintiff damage by direct and  
4 indirect infringement of (including inducing infringement of) the claims of the '090 patent.

5 **V. PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiff prays for relief as follows:

- 7
- 8 a. enter judgment that Defendant has infringed the claims of the '090 patent;
  - 9 b. award Plaintiff damages in an amount sufficient to compensate it for Defendant's  
10 infringement of the Patents-in-Suit in an amount no less than a reasonable royalty or lost  
11 profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. §  
12 284;
  - 13 c. award Plaintiff an accounting for acts of infringement not presented at trial and an award by  
14 the Court of additional damage for any such acts of infringement;
  - 15 d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award Plaintiff its attorneys'  
16 fees, expenses, and costs incurred in this action;
  - 17 e. declare Defendant's infringement to be willful and treble the damages, including attorneys'  
18 fees, expenses, and costs incurred in this action and an increase in the damage award  
19 pursuant to 35 U.S.C. § 284;
  - 20 f. a decree addressing future infringement that either (i) awards a permanent injunction  
21 enjoining Defendant and its agents, servants, employees, affiliates, divisions, and  
22 subsidiaries, and those in association with Defendant from infringing the claims of the  
23 Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an  
24 amount consistent with the fact that for future infringement the Defendant will be an  
25  
26  
27  
28

1 adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the  
2 future infringement will be willful as a matter of law; and

3 g. award Plaintiff such other and further relief as this Court deems just and proper.

4 Dated: February 27, 2023

Respectfully submitted,

5  
6 RAMEY LLP

7 /s/ Susan S.Q. Kalra  
Susan S.Q. Kalra (CA State Bar No. 16740)  
8 Email: skalra@rameyfirm.com  
5020 Montrose Blvd., Suite 800  
9 Houston, Texas 77006  
Telephone: (800) 993-7499  
10 Fax: (832) 900-4941

11  
12 /s/ William P. Ramey, III  
William P. Ramey, III (*pro hac vice* anticipated)  
13 Texas Bar No. 24027643  
Email: wramey@rameyfirm.com  
14 5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
15 Telephone: (713) 426-3923  
16 Fax: (832) 689-9175

17 *Attorneys for Plaintiff*  
18 **STREET SPIRIT IP LLC**

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DEMAND FOR JURY TRIAL**

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff Street Spirit IP LLC hereby demands a trial by jury on all issues so triable.

Dated: February 27, 2023

Respectfully submitted,

RAMEY LLP

/s/ Susan S.Q. Kalra  
Susan S.Q. Kalra (CA State Bar No. 16740)  
Email: skalra@rameyfirm.com  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
Telephone: (800) 993-7499  
Fax: (832) 900-4941

/s/ William P. Ramey, III  
William P. Ramey, III (*pro hac vice* anticipated)  
Texas Bar No. 24027643  
Email: wramey@rameyfirm.com  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
Telephone: (713) 426-3923  
Fax: (832) 689-9175

***Attorneys for Plaintiff***  
***STREET SPIRIT IP LLC***