

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AlphaSense, Oy and AlphaSense, Inc.,

Plaintiffs,

v.

Tegus, Inc. and Bamsec, LLC

Defendants.

Civil Action No.

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs AlphaSense Oy and AlphaSense, Inc. (collectively, “AlphaSense”), by and through their undersigned counsel, hereby file the following Complaint against Defendants Tegus, Inc. (“Tegus”) and Bamsec, LLC (“Bamsec”) (collectively “Defendants”) and allege as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement of six U.S. patents—U.S. Patent Nos. 11,216,164 (“the ’164 Patent”) (Ex. A), 11,244,273 (“the ’273 Patent”) (Ex. B), 11,281,739 (“the ’739 Patent”) (Ex. C), 11,550,453 (“the ’453 Patent”) (Ex. D), 11,687,218 (“the ’218 Patent”) (Ex. E), and 11,704,006 (“the ’006 Patent”) (Ex. F) (collectively the “Patents-in-Suit”)—arising under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

2. AlphaSense launched its revolutionary and award-winning AlphaSense Platform (the “AS Platform”) in 2010. The AS Platform features a search engine that enables its users to quickly identify relevant information within financial documents.

3. Before launching the AS Platform, AlphaSense filed for United States Patent protection for its innovations. AlphaSense’s first patent issued as U.S. Patent No. 11,023,675 (“the ’675 Patent”). The six Patents-in-Suit, which issued thereafter, are related to the ’675 Patent.

AlphaSense continued to improve and market its AS Platform in subsequent years, generating significant attention from the financial technology industry.

4. The innovations of the AS Platform have been recognized by over 4,000 enterprise customers, including the majority of the S&P 500 companies. In addition, the innovations of the AS Platform have been recognized by some of the world's leading institutional investors that have invested over \$500 million in AlphaSense.

5. On information and belief, in 2013, Bamsec entered the market with its own document search technology platform (the "Bamsec Platform") which it has continued to develop. As will be shown, the user interface of the Bamsec Platform is remarkably similar to the AS Platform in terms of purpose, functionality, and even aesthetics. The Bamsec Platform infringes the six Patents-in-Suit which cover the AS Platform, causing AlphaSense irreparable harm unless this Court intervenes to enjoin further infringement.

6. On information and belief, in 2017, Tegos entered the market with its own document search technology platform (the "Tegos Platform"). On information and belief, Tegos acquired Bamsec and the Bamsec Platform in 2021 and has integrated key elements of the functionality of the Bamsec Platform into the Tegos Platform. On information and belief, the user interface of the Tegos Platform is remarkably similar to the AS Platform in terms of purpose, functionality, and even aesthetics. The Tegos Platform infringes at least some of the Patents-in-Suit which cover the AS Platform, causing AlphaSense irreparable harm unless this Court intervenes to enjoin further infringement.

7. AlphaSense respectfully seeks, among other things, injunctive relief prohibiting Tegos and Bamsec from infringing the Patents-in-Suit and requiring Tegos and Bamsec to remove AlphaSense's patented technology from their products. AlphaSense also seeks the payment of

damages, to the extent that such damages can be computed, for Tegus's and Bamsec's acts of infringement.

THE PARTIES

8. Plaintiff AlphaSense Oy is a Finnish limited company with a principal place of business located at Itämerenkatu 3 00180, Helsinki, Finland. Plaintiff AlphaSense, Inc. is a California corporation with a principal place of business located at 24 Union Square East, 5th Floor, New York, NY 10003. AlphaSense conducts business through its website located at www.alpha-sense.com.

9. Upon information and belief, Defendant Tegus, Inc. ("Tegus") is a Delaware corporation with a principal place of business located at 200 N. LaSalle St., Suite 1100, Chicago, IL 60601. On information and belief, Tegus is registered with the Delaware Secretary of State to transact business in Delaware. On information and belief, Tegus maintains a registered agent in Delaware, namely Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. On information and belief, Tegus markets and conducts business through its website located at www.tegus.com and servers accessed by mobile apps.

10. Upon information and belief, Defendant Bamsec, LLC ("Bamsec") is a Delaware limited liability company with a principal place of business located at 200 N. LaSalle St., Suite 1100, Chicago, IL 60601. On information and belief, Bamsec is registered with the Delaware Secretary of State to transact business in Delaware. On information and belief, Bamsec maintains a registered agent in Delaware, namely Telos Legal Corp., 13 West Main St., Felton, DE 19943. On information and belief, Bamsec is wholly owned by Tegus. On information and belief, Bamsec and/or Tegus market and conduct business through the websites located at www.bamsec.com and/or www.tegus.com/bamsec.

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

12. Plaintiff AlphaSense Oy is the owner, by assignment, of each of the Patents-in-Suit. Plaintiff AlphaSense Oy has granted Plaintiff AlphaSense, Inc. an exclusive license to the Patents-in-Suit. Therefore, Plaintiffs AlphaSense Oy and AlphaSense, Inc. have standing to pursue the relief sought herein.

13. This Court has personal jurisdiction over each named Defendant. Each named Defendant is incorporated in, present within, and/or has minimum contacts within the State of Delaware and this judicial district and has purposefully availed itself of the privileges of conducting business in the State of Delaware and in this judicial district. Further, AlphaSense's causes of action arise directly from Defendants' business contacts and other activities in the State of Delaware and in this judicial district.

14. Venue is proper in this District under 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b) because Defendants are incorporated in Delaware and therefore reside in Delaware. Further, Defendants have committed, and continue to commit, acts of infringement in this District. Further, venue is proper because Defendants conducts substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and/or (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to companies and/or individuals in Delaware and this District.

BACKGROUND

A. AlphaSense Platform

15. AlphaSense is the creator of the AS Platform, a document search technology platform featuring an innovative search engine that allows users to quickly search through financial

data sources (e.g., SEC or other regulatory filings and transcripts of investor or expert calls) for information matching the users' queries and/or terms that are synonymous with the user's query. AlphaSense owns and operates the website www.alpha-sense.com to promote the AS Platform.

16. A key feature of the AS Platform is its unique graphical interface, which makes it easy for users to locate and identify relevant financial data points for nearly any company across large volumes of financial documents from a range of sources. AlphaSense thereby creates value for its customers by making their financial research more efficient. Among its thousands of enterprise customers that have recognized AlphaSense's technological innovations, AlphaSense counts more than 80% of the S&P 100, a majority of the S&P 500 companies, as well as over a thousand financial institutions, consultancies, and pharmaceutical corporations.

17. The AS Platform's patented search technology aggregates hundreds of millions of financial documents that users can parse by company and/or keyword to generate relevant results.

18. Because AlphaSense's business depends on the AS Platform's search engine and user interface, AlphaSense devoted significant time and effort to create a distinct, novel, and valuable graphical user interface and a powerful, purpose-built financial search engine to attract and retain customers.

19. AlphaSense has been recognized in the industry for its innovations. AlphaSense's recent awards and recognition include:

- 2019 Frost & Sullivan: Technology Innovation Award. Ex. G.
- 2021 FinTech Breakthrough Awards: Best Financial Research and Data Company for a second year straight for allowing users "to make data-driven decisions rapidly and accurately with access to thousands of premium business data sources – indexed, searchable, and all in one place." Ex. H.

- 2021 WatersTechnology Inside Market Data and Inside Reference Data Awards: Best AI/Machine Learning Data Initiative. Ex. I.
- 2022 G2: #1 ranked financial research solution. Ex. J.
- 2023 The Forrester Wave™ Market And Competitive Intelligence, Q2 2023 report: AlphaSense is recognized as the largest player in market and competitive intelligence and receives the highest possible scores in AI Capabilities, Search and Filter, Vision, Innovation, and coverage across Proprietary, Paywalled, and Internal sources. Ex. K.
- 2023 \$100 million investment from CapitalG, Alphabet’s independent growth fund. Ex. L.
- 2023 Forbes: Leading AI 50 Companies. Ex. M.

20. In its 2019 award, Frost & Sullivan credited AlphaSense with solving the automated search industry’s “qualitative data problem.” Ex. N at 3. Prior to AlphaSense’s AS Platform, it was well known that, “[w]hile all business enterprises have unique needs, most share the common challenge of managing large amounts of structured and unstructured data. The lack of comprehensive automated data search systems and the inability to extract highly relevant content based on users’ queries have remained chief concerns for enterprises worldwide.” Ex. N at 3. To address these challenges, AlphaSense “introduced an AI-powered search technology platform” that “leverages machine learning and natural language processing (NLP) technology to automate the classification and extraction of unstructured data from a mix of varied sources, such as public documents, internal documents, brokerage research, trade journals, and news publications.” Ex. N at 3. The AS Platform “focuses on the needs particular to knowledge professionals, thus creating a semantic search engine that empowers them to find critical information efficiently instead of

working manually to painstakingly connect those data points.” Ex. N at 4. And, among other features evidencing AlphaSense’s “visionary innovation,” Frost & Sullivan highlighted that the AS Platform “searches not only the exact search term supplied by the user, but also synonyms tied to the business or financial subject matter” and thus “enables comprehensive synonym recognition for themes, keywords, and complex terms that do not form part of standard nomenclature.” Ex. N at 4.

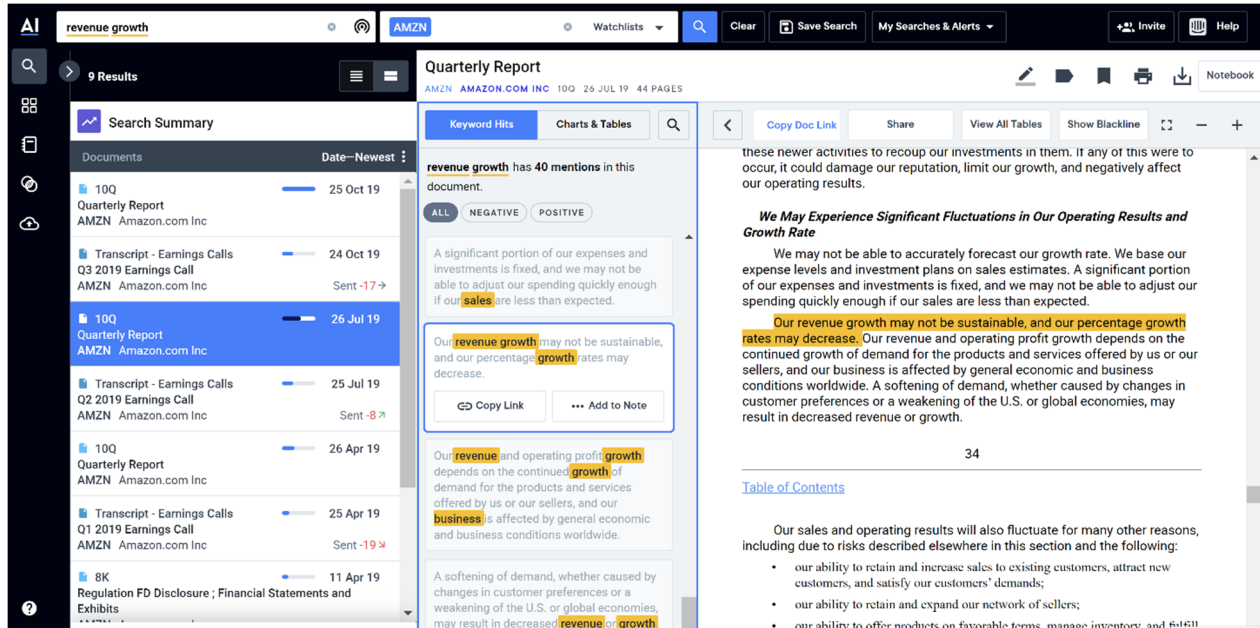
B. Bamsec and Tegos Platforms

21. Approximately three years after AlphaSense launched its AS Platform, Bamsec launched the Bamsec Platform “to provide a better experience when investors need to pull just the facts about a company.” Ex. O (Tegus Press Release Dec. 2021).

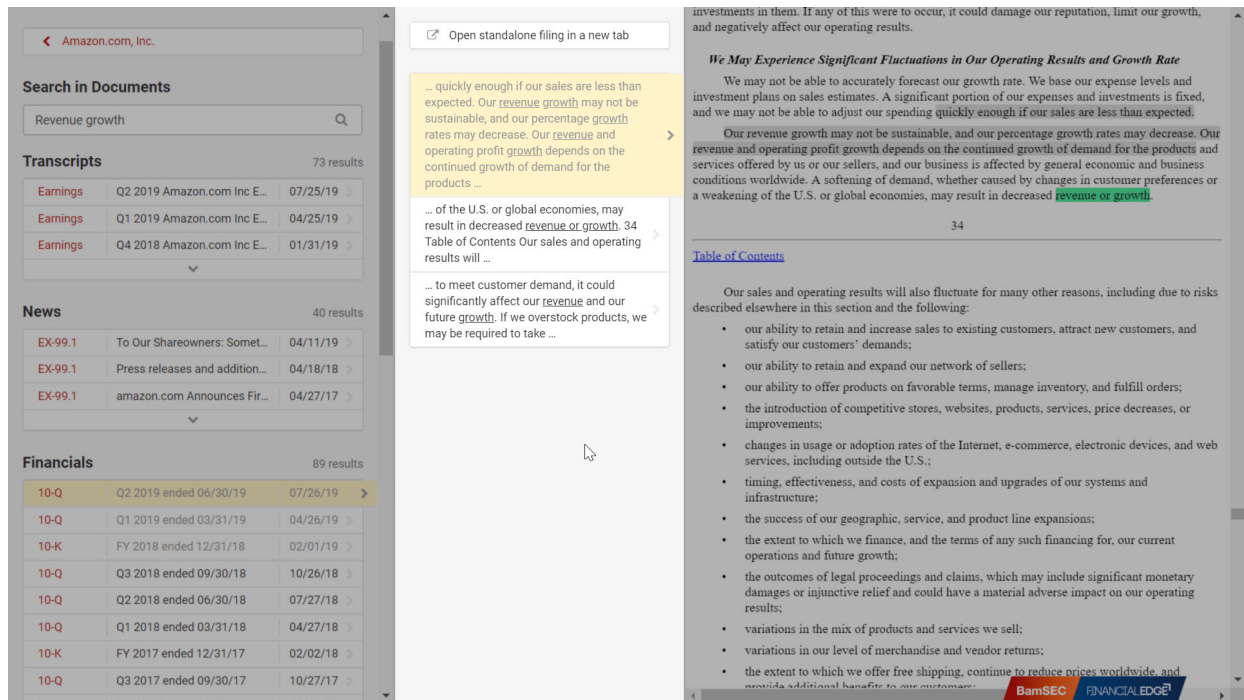
22. On or around the fourth quarter of 2021, Tegus announced plans to acquire Bamsec and the Bamsec Platform. In the December 2021 press release announcing completion of the acquisition, Tegus stated “[w]ork is already underway to integrate BamSEC's data and workflow functionality into Tegus to create a uniformed customer experience.” Ex. O. Accordingly, on information and belief, Tegus has incorporated significant elements of the infringing Bamsec Platform into its Tegus Platform products accessible over the web and on mobile devices to users.

23. As shown below, the search user interface and presentation of search results of the Bamsec Platform is strikingly similar to the search user interface and presentation of search results of the AS Platform.

AlphaSense Platform:



BamSEC Platform:



24. Although document search results can be presented in many different ways, Bamsec chose to build its user interface to present its search results in a substantially similar way to that of the AS Platform.

C. AlphaSense's '164 Patent

25. On January 4, 2022, the United States Patent and Trademark Office issued the '164 Patent, entitled "Server With Associated Remote Display Having Improved Ornamentality and User Friendliness for Searching Documents Associated With Publicly Traded Companies." A true and correct copy of the '164 Patent is attached hereto as Ex. A and incorporated herein by reference.

26. The '164 Patent, as embodied by the claims, provides novel, non-obvious methods and systems for efficiently searching a voluminous number of financial documents primarily for publicly traded companies using keyword proximity searching. The claimed methods and systems produce an easy-to-use interface for searching documents associated with publicly traded companies that, among other things, enables the user to: (1) select a matching document to quickly view complete sentence snippets within the document that have the matching search keywords; and (2) select a displayed snippet to allow the user to view the snippet as it appears within the document and with its surrounding text. This allows the user to quickly find and scan through important concepts in a large number of financial related documents without the need for extensive manual research and without missing the user's desired documents.

27. The '164 Patent claims technical solutions to problems that arise in the development and implementation of search engines for financial documents. For example, the '164 Patent identifies a number of technical drawbacks of prior art systems, including, for example:

Conventional web search engines return links to entire documents in response to a search query consisting of keywords or phrases given by the user. In the financial domain, the end user is often a financial analyst who is researching the information source and looking for specific textual information within a specific contextual topic. ... Also, financial analysts are often evaluating whether the text expressions are positive or negative for the company's stock price, but traditional search engines do not allow the analyst to search for text that is either positive or negative from the perspective of the price of the company's stock. In addition, the analyst would

like to know if the statement was made earlier, is a recurring statement and if it refers to an event in the future.

Thus, it is desirable to provide a method and a system for efficiently conducting contextual, uniqueness or recurring, tense and sentiment-aware deep search within a document, and it is to this end that the disclosure is directed.

Ex. A at 1:18–51.

28. The claims of the '164 Patent are directed to patent-eligible, non-abstract ideas, as the claims are directed to technical solutions to overcome at least the problems identified above. For example, the claimed systems and methods enhance the process for searching for financial documents associated with publicly traded companies, reviewing search results, and accessing documents of interest. Ex. A at 14:61 – 17:3. As a result, the '164 Patent claims inventive concepts that are significantly more than a patent-ineligible, abstract idea. This was confirmed by the Examiner during prosecution of the application that would issue as the '164 Patent. Ex. P. It was also confirmed by the Examiner during prosecution of the '675 and '739 Patents. Exs. Q and R.

29. For further example, a problem solved by the '164 patent relates to conventional search engines returning links to entire documents in response to a search query consisting of keywords or phrases. Ex. A at 1:18-20. But, because these search engines return full documents, “a user has to spend endless amounts of time clicking through those documents to see if there is something potentially useful.” Ex. A at 14:22-24.

30. To solve this technological problem when reviewing search results in conventional computer user interfaces, the inventors created a new user interface for displaying financial documents located in response to their keywords search: First, the system displays a list of the documents identified in response to the search (Ex. A at 12:24-25), as shown in the red box, which has been added to Figure 5B:

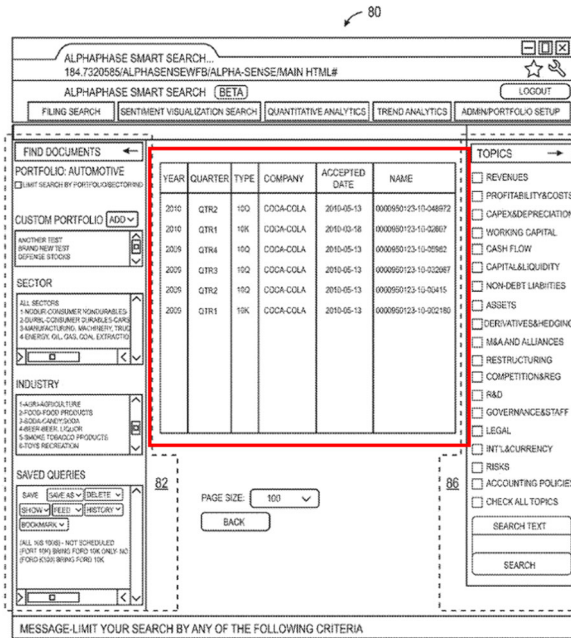


FIG. 5B

31. Second, when one of the returned documents is selected, the user interface displays the extracted sentences as shown in FIG. 6. Ex. A at 12:7-10. In one embodiment, these displayed “snippets” are shown in different colors depending on the sentiment being conveyed in the sentence (e.g., red for negative sentiments, green for positive sentiments, and plain black/uncolored for neutral sentiment). Ex. A at 12:52-56. Figure 6 is shown below, with the green and red shading added to show how the sentences would appear in the user interface:

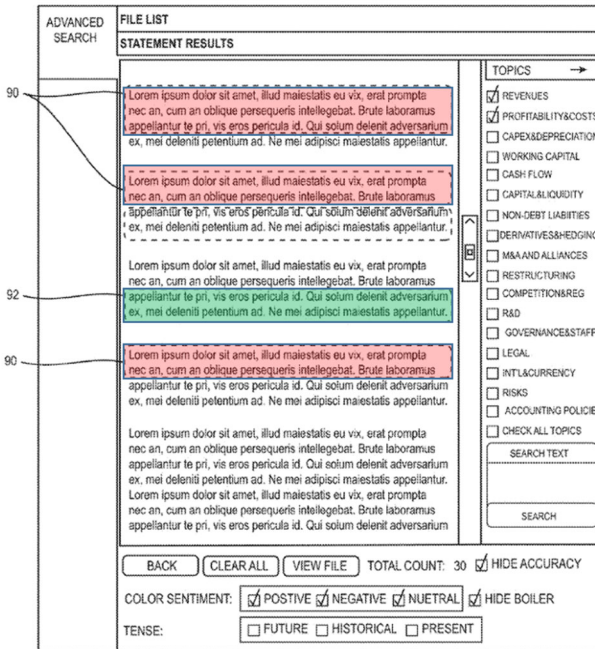


FIG. 6

The inventors explained how the display of these snippets provides an improved user interface over those of traditional search engines: “The search system viewing as shown in FIG. 6 allows the user to rapidly review a long document, such as a new SEC filing, and quickly see sentences in the document,” including, for example, those that are positive, negative or neutral. Ex. A at 12:67-13:13.

32. Third, the system allows the user to quickly drill down to specific portions of one of the financial documents located by the search query and retrieve relevant text. Ex. A at 5:45-50. As shown in Figures 9A and 9B, the user interface displays a summary of one of the retrieved financial documents based on the search query. Ex. A at 13:59-14:18. This summary of a financial document can include a selected sentence, with highlighting, that was displayed as a result of the search query, as shown in Figure 6 and, additionally, include text surrounding the sentences, as shown in Figures 9A and 9B, below:

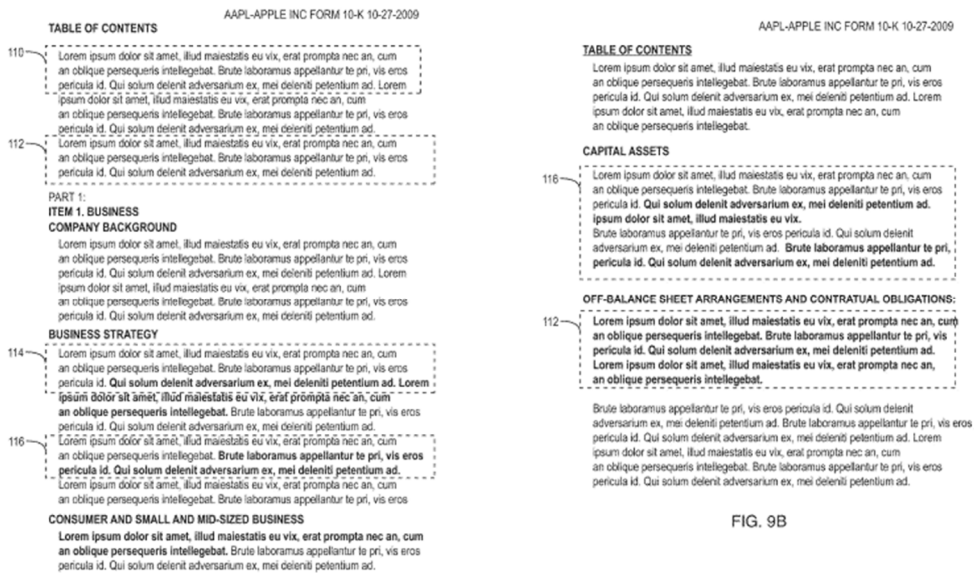


FIG. 9A

FIG. 9B

Again, the inventors explained the improvements provided by highlighting sentences in a summary of a document, including skim-reading through a pre-highlighted document, focusing on what is important, as opposed to having to read everything. Ex. A at 14:15-18.

33. The '164 Patent covers important innovations that have made the AlphaSense Platform successful.

D. AlphaSense's '273 Patent

34. On February 8, 2022, the United States Patent and Trademark Office issued the '273 Patent, entitled "System For Searching And Analyzing Documents In The Financial Industry." A true and correct copy of the '273 Patent is attached hereto as Ex. B and incorporated herein by reference.

35. The '273 Patent, as embodied by the claims, provides novel, non-obvious methods and systems for efficiently searching a voluminous number of financial documents primarily for publicly traded companies using keyword proximity searching. The claimed methods and systems produce an easy-to-use interface for searching documents associated with publicly traded

companies that, among other things, enables the user to: (1) select a matching document to quickly view complete sentence snippets within the document that have the matching search keywords; (2) select a displayed snippet to allow the user to view the snippet as it appears within the document and with its surrounding text; and (3) view recurring statements in the financial documents. This allows the user to quickly find and scan through important concepts in a large number of financial related documents without the need for extensive manual research and without missing the user's desired documents.

36. The '273 Patent claims technical solutions to problems that arise in the development and implementation of search engines for financial documents. For example, the '273 Patent identifies a number of technical drawbacks of prior art systems, including, for example:

Conventional web search engines return links to entire documents in response to a search query consisting of keywords or phrases given by the user. In the financial domain, the end user is often a financial analyst who is researching the information source and looking for specific textual information within a specific contextual topic. ... Also, financial analysts are often evaluating whether the text expressions are positive or negative for the company's stock price, but traditional search engines do not allow the analyst to search for text that is either positive or negative from the perspective of the price of the company's stock. In addition, the analyst would like to know if the statement was made earlier, is a recurring statement and if it refers to an event in the future.

Thus, it is desirable to provide a method and a system for efficiently conducting contextual, uniqueness or recurring, tense and sentiment-aware deep search within a document, and it is to this end that the disclosure is directed.

Ex. B at 1:13-47.

37. The claims of the '273 Patent are directed to patent-eligible, non-abstract ideas, as the claims are directed to technical solutions to overcome at least the problems identified above. For example, the claimed systems and methods enhance the process for searching for financial documents associated with publicly traded companies, reviewing search results, and accessing documents of interest. Ex. B at 14:15 – 16:45. As a result, the '273 Patent claims inventive

concepts that are significantly more than a patent-ineligible, abstract idea. This was confirmed by the Examiner during prosecution of the application that would issue as the '273 Patent. Ex. S. It was also confirmed by the Examiner during prosecution of the '675 and '739 Patents. Exs. Q and R. AlphaSense further incorporates by reference its discussion above from the '164 Patent discussion regarding the problems solved by the claimed inventions and their inventive concepts.

38. The '273 Patent covers important innovations that have made the AlphaSense Platform successful.

E. AlphaSense's '739 Patent

39. On March 22, 2022, the United States Patent and Trademark Office issued the '739 Patent, entitled "Computer With Enhanced File And Document Review Capabilities." A true and correct copy of the '739 Patent is attached hereto as Ex. C and incorporated herein by reference.

40. The '739 Patent, as embodied by the claims, provides novel, non-obvious methods and systems for efficiently searching a voluminous number of financial documents primarily for publicly traded companies using keyword proximity searching. The claimed methods and systems produce an easy-to-use interface for searching documents associated with publicly traded companies that, among other things, enables the user to: (1) select a matching document to quickly view complete sentence snippets within the document that have the matching search keywords; (2) select a displayed snippet to allow the user to view the snippet as it appears within the document and with its surrounding text; and (3) review financial documents grouped according to type. This allows the user to quickly find and scan through important concepts in a large number of financial related documents without the need for extensive manual research and without missing the user's desired documents.

41. The '739 Patent claims technical solutions to problems that arise in the development and implementation of search engines for financial documents. For example, the '739 Patent identifies a number of technical drawbacks of prior art systems, including, for example:

Conventional web search engines return links to entire documents in response to a search query consisting of keywords or phrases given by the user. In the financial domain, the end user is often a financial analyst who is researching the information source and looking for specific textual information within a specific contextual topic. ... Also, financial analysts are often evaluating whether the text expressions are positive or negative for the company's stock price, but traditional search engines do not allow the analyst to search for text that is either positive or negative from the perspective of the price of the company's stock. In addition, the analyst would like to know if the statement was made earlier, is a recurring statement and if it refers to an event in the future.

Thus, it is desirable to provide a method and a system for efficiently conducting contextual, uniqueness or recurring, tense and sentiment-aware deep search within a document, and it is to this end that the disclosure is directed.

Ex. C at 1:12–46.

42. The claims of the '739 Patent are directed to patent-eligible, non-abstract ideas, as the claims are directed to technical solutions to overcome at least the problems identified above. For example, the claimed systems and methods enhance the process for searching for financial documents associated with publicly traded companies, reviewing search results, and accessing documents of interest. Ex. C at 14:13 – 16:47. As a result, the '739 Patent claims inventive concepts that are significantly more than a patent-ineligible, abstract idea. This was confirmed by the Examiner during prosecution of the application that would issue as the '739 Patent. Ex. I. It was also confirmed by the Examiner during prosecution of the '739 Patents. Ex. R. AlphaSense further incorporates by reference its discussion above from the '164 Patent discussion regarding the problems solved by the claimed inventions and their inventive concepts.

43. The '739 Patent covers important innovations that have made the AlphaSense Platform successful.

F. AlphaSense's '453 Patent

44. On January 10, 2023, the United States Patent and Trademark Office issued the '453 Patent, entitled "User Interface For Use With A Search Engine For Searching Financial Related Documents." A true and correct copy of the '453 Patent is attached hereto as Ex. D and incorporated herein by reference.

45. The '453 Patent, as embodied by the claims, provides novel, non-obvious methods and systems for efficiently searching a voluminous number of financial documents primarily for publicly traded companies using keyword proximity searching. The claimed methods and systems produce an easy-to-use interface for searching documents associated with publicly traded companies that, among other things, enables the user to: (1) select a matching document to quickly view complete sentence snippets within the document that have the matching search keywords; and (2) select a displayed snippet to allow the user to view the snippet as it appears within the document and with its surrounding text. This allows the user to quickly find and scan through important concepts in a large number of financial related documents without the need for extensive manual research and without missing the user's desired documents.

46. The '453 Patent claims technical solutions to problems that arise in the development and implementation of search engines for financial documents. For example, the '453 Patent identifies a number of technical drawbacks of prior art systems, including, for example:

Conventional web search engines return links to entire documents in response to a search query consisting of keywords or phrases given by the user. In the financial domain, the end user is often a financial analyst who is researching the information source and looking for specific textual information within a specific contextual topic. ... Also, financial analysts are often evaluating whether the text expressions are positive or negative for the company's stock price, but traditional search engines do not allow the analyst to search for text that is either positive or negative from the perspective of the price of the company's stock. In addition, the analyst would like to know if the statement was made earlier, is a recurring statement and if it refers to an event in the future.

Thus, it is desirable to provide a method and a system for efficiently conducting contextual, uniqueness or recurring, tense and sentiment-aware deep search within a document, and it is to this end that the disclosure is directed.

Ex. D at 1:55–2:23.

47. The claims of the '453 Patent are directed to patent-eligible, non-abstract ideas, as the claims are directed to technical solutions to overcome at least the problems identified above. For example, the claimed systems and methods enhance the process for searching for financial documents associated with publicly traded companies, reviewing search results, and accessing documents of interest. Ex. D at 15:49 – 18:30. As a result, the '453 Patent claims inventive concepts that are significantly more than a patent-ineligible, abstract idea. This was confirmed by the Examiner during prosecution of the application that would issue as the '453 Patent. Ex. T. It was also confirmed by the Examiner during prosecution of the '675 and '739 Patents. Exs. Q and R. AlphaSense further incorporates by reference its discussion above from the '164 Patent discussion regarding the problems solved by the claimed inventions and their inventive concepts.

48. The '453 Patent covers important innovations that have made the AlphaSense Platform successful.

G. AlphaSense's '218 Patent

49. On June 27, 2023, the United States Patent and Trademark Office issued the '218 Patent, entitled "User Interface For Use With A Search Engine For Searching Financial Related Documents." A true and correct copy of the '218 Patent is attached hereto as Ex. E and incorporated herein by reference.

50. The '218 Patent, as embodied by the claims, provides novel, non-obvious methods and systems for efficiently searching a voluminous number of financial documents primarily for publicly traded companies using keyword proximity searching. The claimed methods and systems produce an easy-to-use interface for searching documents associated with publicly traded

companies that, among other things, enables the user to: (1) select a matching document to quickly view complete sentence snippets within the document that have the matching search keywords; (2) select a displayed snippet to allow the user to view the snippet as it appears within the document and with its surrounding text; and (3) receive reports with sentence snippets when new financial documents are identified. This allows the user to quickly find and scan through important concepts in a large number of financial related documents without the need for extensive manual research and without missing the user's desired documents.

51. The '218 Patent claims technical solutions to problems that arise in the development and implementation of search engines for financial documents. For example, the '218 Patent identifies a number of technical drawbacks of prior art systems, including, for example:

Conventional web search engines return links to entire documents in response to a search query consisting of keywords or phrases given by the user. In the financial domain, the end user is often a financial analyst who is researching the information source and looking for specific textual information within a specific contextual topic. ... Also, financial analysts are often evaluating whether the text expressions are positive or negative for the company's stock price, but traditional search engines do not allow the analyst to search for text that is either positive or negative from the perspective of the price of the company's stock. In addition, the analyst would like to know if the statement was made earlier, is a recurring statement and if it refers to an event in the future.

Thus, it is desirable to provide a method and a system for efficiently conducting contextual, uniqueness or recurring, tense and sentiment-aware deep search within a document, and it is to this end that the disclosure is directed.

Ex. E at 1:63–2:32.

52. The claims of the '218 Patent are directed to patent-eligible, non-abstract ideas, as the claims are directed to technical solutions to overcome at least the problems identified above. For example, the claimed systems and methods enhance the process for searching for financial documents associated with publicly traded companies, reviewing search results, and accessing documents of interest. Ex. E at 15:20 – 18:52. As a result, the '218 Patent claims inventive concepts

that are significantly more than a patent-ineligible, abstract idea. This was confirmed by the Examiner during prosecution of the application that would issue as the '218 Patent. Ex. U. It was also confirmed by the Examiner during prosecution of the '675 and '739 Patents. Exs. Q and R. AlphaSense further incorporates by reference its discussion above from the '164 Patent discussion regarding the problems solved by the claimed inventions and their inventive concepts.

53. The '218 Patent covers important innovations that have made the AlphaSense Platform successful.

H. AlphaSense's '006 Patent

54. On July 18, 2023, the United States Patent and Trademark Office issued the '006 Patent, entitled "User Interface For Use With A Search Engine For Searching Financial Related Documents." A true and correct copy of the '006 Patent is attached hereto as Ex. F and incorporated herein by reference.

55. The '006 Patent, as embodied by the claims, provides novel, non-obvious methods and systems for efficiently searching a voluminous number of financial documents primarily for publicly traded companies using keyword searching. The claimed methods and systems produce an easy-to-use interface for searching documents associated with publicly traded companies that, among other things, enables the user to: (1) select a matching document to quickly view complete sentence snippets within the document that have the matching search keywords; (2) select a displayed snippet to allow the user to view the snippet as it appears within the document and with its surrounding text; and (3) receive reports with sentence snippets when new financial documents are identified. This allows the user to quickly find and scan through important concepts in a large number of financial related documents without the need for extensive manual research and without missing the user's desired documents.

56. The '006 Patent claims technical solutions to problems that arise in the development and implementation of search engines for financial documents. For example, the '006 Patent identifies a number of technical drawbacks of prior art systems, including, for example:

Conventional web search engines return links to entire documents in response to a search query consisting of keywords or phrases given by the user. In the financial domain, the end user is often a financial analyst who is researching the information source and looking for specific textual information within a specific contextual topic. ... Also, financial analysts are often evaluating whether the text expressions are positive or negative for the company's stock price, but traditional search engines do not allow the analyst to search for text that is either positive or negative from the perspective of the price of the company's stock. In addition, the analyst would like to know if the statement was made earlier, is a recurring statement and if it refers to an event in the future.

Thus, it is desirable to provide a method and a system for efficiently conducting contextual, uniqueness or recurring, tense and sentiment-aware deep search within a document, and it is to this end that the disclosure is directed.

Ex. F at 1:60–2:27.

57. The claims of the '006 Patent are directed to patent-eligible, non-abstract ideas, as the claims are directed to technical solutions to overcome at least the problems identified above. For example, the claimed systems and methods enhance the process for searching for financial documents associated with publicly traded companies, reviewing search results, and accessing documents of interest. Ex. F at 14:58 – 18:31. As a result, the '006 Patent claims inventive concepts that are significantly more than a patent-ineligible, abstract idea. This was confirmed by the Examiner during prosecution of the application that would issue as the '006 Patent. Ex. V. It was also confirmed by the Examiner during prosecution of the '675 and '739 Patents. Exs. Q and R. AlphaSense further incorporates by reference its discussion above from the '164 Patent discussion regarding the problems solved by the claimed inventions and their inventive concepts.

58. The '006 Patent covers important innovations that have made the AlphaSense Platform successful.

GENERAL ALLEGATIONS RELATED TO INFRINGEMENT

59. Defendants have infringed and continue to directly infringe at least one claim of each of the Patents-in-Suit by engaging in acts constituting infringement under at least 35 U.S.C. § 271(a), including but not limited to one or more of making, using, selling, operating, offering for sale the Tegos and Bamsec Platforms, in this District and elsewhere in the United States.

60. As a result of Defendants' infringement, AlphaSense has suffered and will continue to suffer harm. To the extent determinable, AlphaSense is entitled to pre-suit damages for Defendants' infringement from the date of issuance of each of the Patents-in-Suit up to six years prior to the filing the suit as allowed under 35 U.S.C. §286 and to ongoing damages. The requirements of 35 U.S.C. § 287 have been met with respect to the Patents-in-Suit. Further, as a result of Defendants' misappropriations of AlphaSense's inventions, AlphaSense was effectively precluded from selling its AS Platform to potential customers resulting in lost profits.

COUNT I

(The Tegos and Bamsec Platforms' Infringements of the '164 Patent)

61. All preceding paragraphs are incorporated by reference as if fully restated herein.

62. Since deploying its document search technology platform, Tegos has maintained, operated, used, and marketed the Tegos Platform primarily for the financial services industry. On information and belief, after acquiring Bamsec, Tegos has incorporated significant elements of the infringing Bamsec Platform into its Tegos Platform products accessible over the web and on mobile devices. The Tegos Platform is accessible through Tegos's website at www.tegus.com, Tegos's web portal at <https://app.tegus.co/>, and through its mobile applications. On information and belief, the Tegos Platform includes at least one server that is configured and operable to, and has been used to, provide search results of financial documents in a manner that infringes at least one claim in AlphaSense's '453 Patent.

63. Prior to its acquisition by Tegos, Bamsec was an independent document search application that was marketed, maintained, and operated by its then owners as a means of aggregating, navigating, searching, and displaying relevant financial content and data. After acquiring Bamsec, Tegos continued to operate it in this fashion as a standalone application. Tegos also markets Bamsec as Bamsec by Tegos and makes Bamsec available on its website. On information and belief, Bamsec is available via the websites, www.bamsec.com and www.tegus.com.

64. On information and belief, the Tegos and Bamsec Platforms include at least one server that is configured to, and has been used to, provide search results in a manner that infringes at least one claim in AlphaSense's '164 Patent.

65. The preamble of claim 10 of the '164 Patent states:

10. A system for rendering information from a database onto a user interface, the system comprising a server operable to:

66. On information and belief, to the extent that this claim element is determined to be limiting, the Tegos and Bamsec Platforms provide a system for rendering information from one or more databases into the Bamsec and/or Tegos web applications and/or mobile UI's. For example, on information and belief, the Tegos and Bamsec Platforms provide systems configured and operable to render information about financial and other documents based on queries.

67. The first element of claim 10 requires a server that is operable to:

receiving a query from a user at a remote computer to search within the database, wherein the database comprises a plurality of financial documents,

68. On information and belief, the Tegos and Bamsec Platforms include at least one server that has been and is configured and operable to receive a query from a user at a remote computer to search within the database, wherein the database comprises a plurality of financial documents. For example, on information and belief, the Tegos and Bamsec Platforms are

configured and operable to receive queries from users to search financial documents such as filings and transcripts included within one or more databases (e.g., “Search in Documents”).

Document Search

Use [Document Search](#) to instantly find any text within all filings and transcripts for a company. Quickly find out if Management has mentioned a key term on an earnings call or find all of the buried references to an obscure subsidiary in the filings. No more looking through documents one by one, and you can say **goodbye to Ctrl-F**.

The screenshot shows the BamSEC interface for searching documents for Apple Inc. The search bar contains the text "share repurchase". Below the search bar, there are sections for "Transcripts" (23 results) and "News" (17 results). The "Transcripts" section lists three earnings calls from 2016. The "News" section lists one news item from 2016. The search results are displayed in a list format with snippets of text from the documents. The snippets include phrases like "repurchases", "share repurchase", and "share repurchase program".

Bamsec Getting Started Document Search, *available at* <https://help.bamsec.com/docs/getting-started> (Ex. W).

69. The first element of claim 10 further requires a server that is configured as described above, and:

wherein the user query includes:

information identifying a publicly traded company;

a first keyword distinct from the publicly traded company; and

a second keyword distinct from the first keyword and the publicly traded company;

70. On information and belief, the Tegus and Bamsec Platforms include at least one server that has been and is configured and operable to receive queries that include information identifying a publicly traded company, a first keyword distinct from the publicly traded company, and a second keyword distinct from the first keyword and the publicly traded company. For

example, on information and belief, the Tegus and Bamsec Platform user queries include information identifying a publicly traded company (e.g., Amazon.com, Inc., Apple Inc., etc.) and distinct first and second keywords (e.g., “revenue” and “growth” or “share” and “repurchase”).

This video provides a quick overview of how to run a search and navigate results. For step-by-step instructions, jump to [Running a Search](#) below.

The screenshot displays the BamSEC search results for the query "Revenue growth" related to "Amazon.com, Inc.". The interface is divided into several sections:

- Search in Documents:** Shows the search query "Revenue growth" and a search button.
- Transcripts:** Lists 73 results, including earnings reports for Q2 2019, Q1 2019, and Q4 2018.
- News:** Lists 40 results, including press releases and announcements.
- Financials:** Lists 89 results, including quarterly (10-Q) and annual (10-K) reports for various periods from 2017 to 2019.

The right-hand side of the screenshot shows a preview of a document snippet, which is a section titled "The Seasonality of Our Business Places Increased Strain on Our Operations". The snippet discusses the company's expectations for the fourth quarter, mentioning increased demand and the potential for higher revenue and growth.

Bamsec Revenue-Growth Search, *see video available at* <https://help.bamsec.com/docs/document-search>; <https://help.bamsec.com/docs/training-videos> (Document Search Fundamentals) (Ex. X).

71. The second element of claim 10 requires a server that is configured to:
 - executing a search based on the user query;
72. On information and belief, the Tegus and Bamsec Platforms have been and are configured and operable to execute a search based on the user query, for example, as reflected in the screenshots herein showing searches and search results.
73. The third element of claim 10 requires a server that is configured to:
 - generating search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company

in the query and that contain identified snippets of text from within the financial documents, wherein the identified snippets comprise a complete sentence,

wherein the snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document;

74. On information and belief, the Tegos and Bamsec Platforms include at least one server that has been and is configured and operable to generate search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company in the query and that contain identified snippets of text from within the financial documents, wherein the identified snippets comprise a complete sentence, wherein the snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document. For example, on information and belief and as reflected in the screenshot below, the Tegos and Bamsec Platforms are configured and operable to generate search results (e.g., middle pane below) with identified snippets of text in the financial document that are a complete sentence. Additionally, on information and belief, the snippet of text is identified by the Tegos and Bamsec platforms when the first and second keywords appear within a default number of words such as 10 words. Further, on information and belief, the maximum number of words may be configurable using advanced document search operators.

The screenshot displays the BamSEC search interface for Amazon.com, Inc. The search results are categorized into Transcripts, News, Financials, Legal opinion, and Prospectuses and Registration Statements. A search for "[debt value]" has been performed. The "Financials" section is highlighted, showing a list of documents including "10-Q Q2 2019 ended 06/30/19" and "10-K FY 2018 ended 12/31/18".

The detailed view of a financial document snippet shows the following text:

... as of December 31, 2018 and June 30, 2019. The face value of our total long-term debt obligations is as follows (in millions):

	December 31, 2018	June 30, 2019
... Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

The snippet also includes a table titled "Note 5 — DEBT" comparing debt obligations for December 31, 2018 and June 30, 2019. The table lists various notes and their face values for both periods.

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
4.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

75. The fourth element of claim 10 requires a server that is configured to:

causing to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes:

a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document includes content provided by the publicly traded company;

a plurality of the identified snippets for selection by the user,

wherein the plurality of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents,

wherein the plurality of the identified snippets is from the user selected financial document;

text surrounding and containing a user selected snippet from the user selected financial document,

wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet; and

a stock ticker or a name of the publicly traded company.

76. On information and belief, the Tegos and Bamsec Platforms include at least one server that has been and is configured and operable to cause to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes: a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document includes content provided by the publicly traded company; a plurality of the identified snippets for selection by the user, wherein the plurality of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents, wherein the plurality of the identified snippets is from the user selected financial document; text surrounding and containing a user selected snippet from the user selected financial document, wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet; and a stock ticker or a name of the publicly traded company. For example, on information and belief and as reflected in the screenshots below and herein, the Tegos and Bamsec Platforms are configured and operable to cause to render content from generated search results in a web and/or mobile user interface. On information and belief and as reflected herein, the rendered content includes a list of financial documents such as SEC filings, transcripts, etc. associated with a publicly traded company (e.g., left pane below), a plurality of snippets associated with and displayed in response to user selection of one of the financial documents (e.g., middle pane below), text that surrounds and includes the user selected snippet (e.g., right pane below), and the name of the publicly traded company (e.g., top left portion showing company name).

The screenshot displays the BamSEC search interface for Amazon.com, Inc. The search results are categorized into Transcripts (1 result), News (8 results), Financials (69 results), Legal opinion (1 result), and Prospectuses and Registration Statements (8 results). A document snippet is highlighted, showing financial data for long-term debt obligations as of December 31, 2018, and June 30, 2019. The snippet includes a table titled "Note 5 — DEBT" with the following data:

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
2.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

Bamsec Advanced Operators Search, *see video available at <https://help.bamsec.com/docs/training-videos>* (Ex. Y).

77. As a direct and proximate consequence of Tegus’s and Bamsec’s infringements of AlphaSense’s ’164 Patent, AlphaSense has suffered damages in an amount not yet determined for which AlphaSense is entitled to relief. AlphaSense also seeks injunctive relief to prevent its ongoing harm stemming from these infringements.

COUNT II

(The Bamsec Platform’s Infringement of the ’273 Patent)

78. All preceding paragraphs are incorporated by reference as if fully restated herein.

79. Prior to its acquisition by Tegus, Bamsec was an independent document search application that was marketed, maintained, and operated by its then owners as a means of aggregating, navigating, searching, and displaying relevant financial content and data. After acquiring Bamsec, Tegus continued to operate it in this fashion as a standalone application. Tegus also markets Bamsec as Bamsec by Tegus and makes Bamsec available on its website. On

information and belief, Bamsec is available via the websites, www.bamsec.com and www.tegus.com.

80. On information and belief, the Bamsec Platform includes at least one processor that is configured to, and has been used to, provide search results in a manner that infringes at least one claim in AlphaSense's '273 Patent.

81. The preamble of claim 7 of the '273 Patent states:

7. A system for rendering information from a database on a user interface of a remote computer, the system comprising one or more processors operable for:

82. On information and belief, to the extent that this claim element is determined to be limiting, the Bamsec Platform provides a system for rendering information from one or more databases into the Bamsec and/or Tegus web applications and/or mobile UI's. For example, on information and belief, the Bamsec Platform provides a system configured and operable to render information about financial and other documents based on queries.

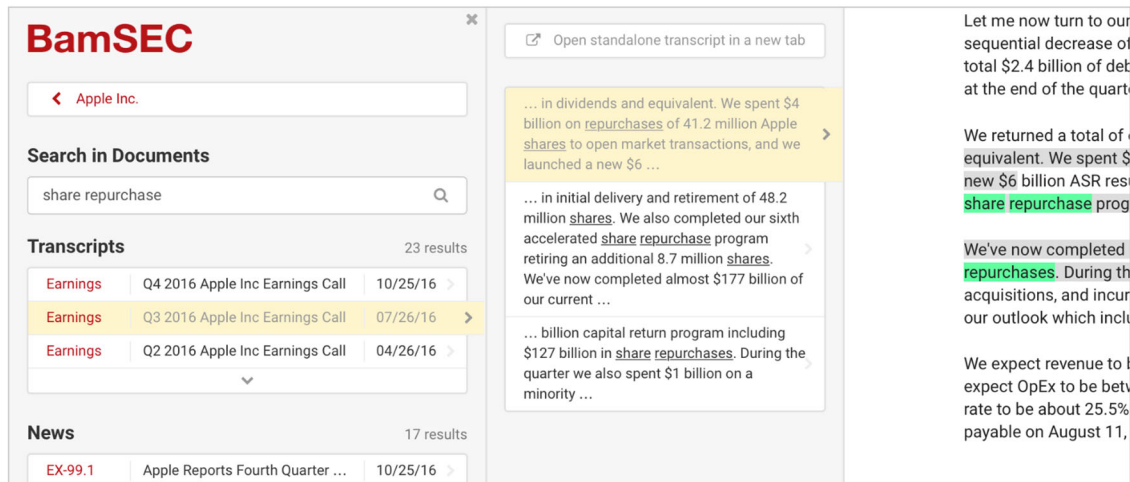
83. The first element of claim 7 requires at least one processor that is operable for:

receiving a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of financial documents,

84. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to receive a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of financial documents. For example, on information and belief, the Bamsec Platform is configured and operable to receive queries from users to search financial documents such as filings and transcripts included within one or more databases (e.g., "Search in Documents").

Document Search

Use **Document Search** to instantly find any text within all filings and transcripts for a company. Quickly find out if Management has mentioned a key term on an earnings call or find all of the buried references to an obscure subsidiary in the filings. No more looking through documents one by one, and you can say **goodbye to Ctrl-F**.



Bamsec Getting Started Document Search, *available at* <https://help.bamsec.com/docs/getting-started> (Ex. W).

85. The first element of claim 7 further requires at least one processor that is operable as described above, and:

wherein the user query includes:

information identifying a publicly traded company;

a first keyword distinct from the publicly traded company; and

a second keyword distinct from the first keyword and the publicly traded company;

86. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to receive queries that include information identifying a publicly traded company, a first keyword distinct from the publicly traded company, and a second keyword distinct from the first keyword and the publicly traded company. For example, on information and belief, the Bamsec Platform user queries include information identifying a

publicly traded company (e.g., Amazon.com, Inc., Apple Inc., etc.) and distinct first and second keywords (e.g., “revenue” and “growth” or “share” and “repurchase”).

This video provides a quick overview of how to run a search and navigate results. For step-by-step instructions, jump to [Running a Search](#) below.

The screenshot displays the BamSEC search results for the query "Revenue growth" on Amazon.com, Inc. The interface is divided into several sections:

- Search in Documents:** A search bar containing "Revenue growth" with a magnifying glass icon.
- Transcripts:** A list of 73 results, including "Earnings" reports for Q2 2019, Q1 2019, and Q4 2018.
- News:** A list of 40 results, including "To Our Shareowners: Somet...", "Press releases and addition...", and "amazon.com Announces Fir...".
- Financials:** A list of 89 results, including "10-Q" reports for Q2 2019, Q1 2019, FY 2018, Q3 2018, Q2 2018, Q1 2018, FY 2017, and Q3 2017.

A snippet of text from a financial document is highlighted in yellow, showing a table of contents for "Our sales and operating results will...". The snippet includes the following text:

... quickly enough if our sales are less than expected. Our revenue growth may not be sustainable, and our percentage growth rates may decrease. Our revenue and operating profit growth depends on the continued growth of demand for the products ...

... of the U.S. or global economies, may result in decreased revenue or growth. 34 Table of Contents Our sales and operating results will ...

... to meet customer demand, it could significantly affect our revenue and our future growth. If we overstock products, we may be required to take ...

The screenshot also shows a snippet of text from a financial document titled "The Seasonality of Our Business Places Increased Strain on Our Operations". The text discusses the company's expectations for the fourth quarter, including a disproportionate amount of net sales, inventory mark downs, and the impact of the holiday season on the fulfillment network.

Bamsec Revenue-Growth Search, *see video available at* <https://help.bamsec.com/docs/document-search>; <https://help.bamsec.com/docs/training-videos> (Document Search Fundamentals) (Ex. X).

87. The second element of claim 7 requires at least one processor that is operable for: executing a search based on the user query;

88. On information and belief, the Bamsec Platform has been and is configured and operable to execute a search based on the user query, for example, as reflected in the screenshots herein showing searches and search results.

89. The third element of claim 7 requires at least one processor that is operable for: generating search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company in the query, the search results containing identified snippets of text from within the financial documents,

wherein a snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document;

90. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to generate search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company in the query, the search results containing identified snippets of text from within the financial documents, wherein a snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document. For example, on information and belief and as reflected in the screenshot below, the Bamsec Platform is configured and operable to generate search results (e.g., middle pane below) with identified snippets of text in the financial document. Additionally, on information and belief, the snippet of text is identified by the Bamsec platform when the first and second keywords appear within a default number of words such as 10 words. Further, on information and belief, the maximum number of words may be configurable using advanced document search operators.

The screenshot displays the BamSEC search interface. On the left, a search bar contains 'Amazon.com, Inc.' and a search box has '[debt value]' entered. Below the search bar are sections for Transcripts (1 result), News (8 results), Financials (69 results), Legal opinion (1 result), and Prospectuses and Registration Statements (8 results). The Financials section is expanded, showing a table of results:

Report Type	Period	End Date	Start Date
10-Q	Q2 2019 ended 06/30/19	07/26/19	
10-Q	Q1 2019 ended 03/31/19	04/26/19	
10-K	FY 2018 ended 12/31/18	02/01/19	

The main content area shows a snippet from a financial document with the following text:

... as of December 31, 2018 and June 30, 2019. The face value of our total long-term debt obligations is as follows (in millions):

	December 31, 2018	June 30, 2019
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,430	\$ 23,430

The snippet also includes a table titled 'Note 5 — DEBT' with columns for 'December 31, 2018' and 'June 30, 2019':

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
2.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,430	\$ 23,430

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

91. The fourth element of claim 7 requires at least one processor that is operable for:

causing to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes:

a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document of the identified financial documents includes content provided by the publicly traded company;

one or more of the identified snippets for selection by the user,

wherein the one or more of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents,

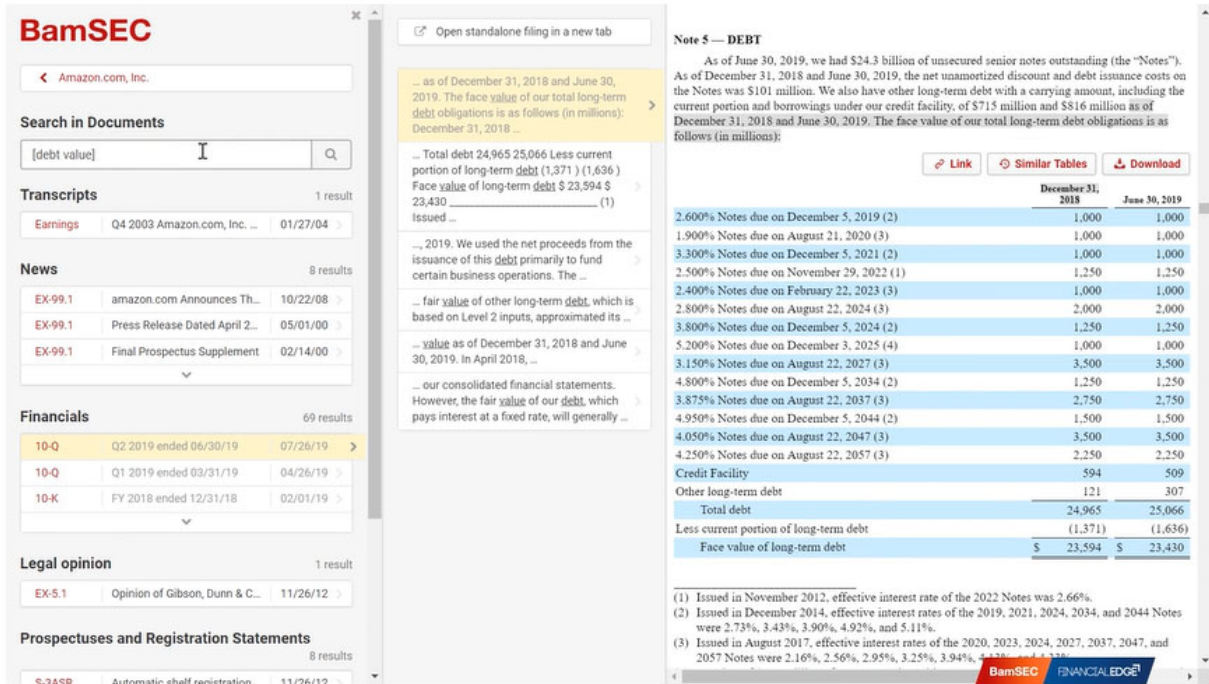
wherein the one or more of the identified snippets is from the user selected financial document;

text surrounding and containing a user selected snippet from the user selected financial document,

wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet; and

a stock ticker or a name of the publicly traded company,

92. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to cause to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes: a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document of the identified financial documents includes content provided by the publicly traded company; one or more of the identified snippets for selection by the user, wherein the one or more of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents, wherein the one or more of the identified snippets is from the user selected financial document; text surrounding and containing a user selected snippet from the user selected financial document, wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet; and a stock ticker or a name of the publicly traded company. For example, on information and belief and as reflected in the screenshots below and herein, the Bamsec Platform is configured and operable to cause to render content from generated search results in a web and/or mobile user interface. On information and belief and as reflected herein, the rendered content includes a list of financial documents such as SEC filings, transcripts, etc. associated with a publicly traded company (e.g., left pane below), one or more snippets associated with and displayed in response to user selection of one of the financial documents (e.g., middle pane below), text that surrounds and includes the user selected snippet (e.g., right pane below) from the selected financial document, and the name of the publicly traded company (e.g., top left portion showing company name).



Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

93. The fifth element of claim 7 requires at least one processor that is operable for:
 identifying recurring statements in the user selected document,

wherein the recurring statements are identified when a statement recurs in sequential documents that are generated by the publicly traded company on a scheduled time basis,

wherein the recurring statements are displayed differently from statements that are not recurring.

94. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to identify recurring statements in the user selected document, wherein the recurring statements are identified when a statement recurs in sequential documents that are generated by the publicly traded company on a scheduled time basis, wherein the recurring statements are displayed differently from statements that are not recurring. For example, on information and belief and as reflected in the screenshots below and herein, the

Bamsec Platform is configured and operable to identify recurring statements in the document selected by the user compared to sequential documents (e.g., the 10-Q's in the screenshot below). Additionally, on information and belief, the recurring statements (e.g., unchanged text) are displayed differently than the non-recurring statements (e.g., the added or deleted text).

3. View the generated comparison. The **green text** represents text that was added in the more recent filing. The **red text** represents text that was removed in the more recent filing. All text that is not highlighted is present in both filings.

This Document Comparison shows changes from the older to the newer exhibit:

- Added text
- Deleted text
- Unchanged text

Share

Newer Exhibit

Filing Form: 10-Q
Date Filed: 04/27/16 4:32 PM EDT
Exhibit: 10-Q

Open exhibit

Older Exhibit

Filing Form: 10-Q
Date Filed: 04/28/15 5:01 PM EDT
Exhibit: 10-Q

Open exhibit

Item 1. Legal Proceedings

The Company is subject to the legal proceedings and claims discussed below as well as certain other legal proceedings and claims that have not been fully resolved and that have arisen in the ordinary course of business. In the opinion of management, there was not at least a reasonable possibility the Company may have incurred a material loss, or a material loss in excess of a recorded accrual, with respect to loss contingencies, contingencies for asserted legal and other claims. However, the outcome of legal proceedings and claims brought against the Company is subject to significant uncertainty. Therefore, although management considers the likelihood of such an outcome to be remote, if one or more of these legal matters were resolved against the Company in a reporting period for amounts in excess of management's expectations, the Company's consolidated financial statements for that reporting period could be materially adversely affected. See the risk factor "The Company could be impacted by unfavorable results of legal proceedings, such as being found to have infringed on intellectual property rights" in Part II, Item 1A of this Form 10-Q under the heading "Risk Factors." The Company settled certain matters during the second quarter of 2015 2016 that did not individually or in the aggregate have a material impact on the Company's financial condition or results of operations, operating results.

Apple eBooks Antitrust Litigation (United States of America v. Apple Inc., et al.)

On April 11, 2012, the U.S. Department of Justice filed a civil antitrust action against the Company and five major book publishers in the U.S. District Court for the Southern District of New York, alleging an unreasonable restraint of interstate trade and commerce in violation of §1 of the Sherman Act and seeking, among other things, injunctive relief, the District Court's declaration that the Company's agency agreements with the publishers are null and void and/or the District Court's reformation of such agreements. On July 10, 2013, the District Court found, following a bench trial, that the Company conspired to restrain trade in violation of §1 of the Sherman Act and relevant state statutes to the extent those laws are congruent with §1 of the Sherman Act. The District Court entered a permanent injunction, which took effect on October 6, 2013 and will be in effect for five years unless the judgment is overturned on appeal, years. The Company has taken the necessary steps to comply with the terms of the District Court's order, including renegotiating agreements with the five major eBook publishers, updating its antitrust training program and hiring an completing a two-year monitorship with a court-appointed antitrust compliance monitor, monitor, whose appointment the District Court ended in October 2015. The Company appealed the District Court's decision. Pursuant Following the exhaustion of all appeals, the Company paid \$450 million in April 2016 pursuant to a settlement agreement reached by the parties in June 2014, any damages the Company may be obligated to pay will be determined by the outcome of the appellate decision. 2014.

Bamsec Compare Filings Function, available at <https://help.bamsec.com/docs/compare-filings> (Ex. Z).

95. As a direct and proximate consequence of Tegus's and Bamsec's infringements of AlphaSense's '273 Patent, AlphaSense has suffered damages in an amount not yet determined for which AlphaSense is entitled to relief. AlphaSense also seeks injunctive relief to prevent its ongoing harm stemming from these infringements.

COUNT III

(The Bamsec Platform's Infringement of the '739 Patent)

96. All preceding paragraphs are incorporated by reference as if fully restated herein.

97. Prior to its acquisition by Tegos, Bamsec was an independent document search application that was marketed, maintained, and operated by its then owners as a means of aggregating, navigating, searching, and displaying relevant financial content and data. After acquiring Bamsec, Tegos continued to operate it in this fashion as a standalone application. Tegos also markets Bamsec as Bamsec by Tegos and makes Bamsec available on its website. On information and belief, Bamsec is available via the websites, www.bamsec.com and www.tegus.com.

98. On information and belief, the Bamsec Platform includes at least one processor that is configured to, and has been used to, provide search results in a manner that infringes at least one claim in AlphaSense's '739 Patent.

99. The preamble of claim 10 of the '739 Patent states:

10. A system for rendering information from a database onto a user interface at a remote computer, the system comprising a server having one or more processors configured for:

100. On information and belief, to the extent that this claim element is determined to be limiting, the Bamsec Platform provides a system for rendering information from one or more databases into the Bamsec and/or Tegos web applications and/or mobile UI's that includes one or more servers with one or more processors. For example, on information and belief, the Bamsec Platform provides a system configured and operable to render information about financial and other documents based on queries.

101. The first element of claim 10 requires at least one processor that is operable for:

receiving a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of financial documents,

102. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to receive a query from a user at the remote computer to

search within the database, wherein the database comprises a plurality of financial documents. For example, on information and belief, the Bamsec Platform is configured and operable to receive queries from users to search financial documents such as filings and transcripts included within one or more databases (e.g., “Search in Documents”).

Document Search

Use **Document Search** to instantly find any text within all filings and transcripts for a company. Quickly find out if Management has mentioned a key term on an earnings call or find all of the buried references to an obscure subsidiary in the filings. No more looking through documents one by one, and you can say **goodbye to Ctrl-F**.

The screenshot displays the BamSEC web application interface. At the top left, the logo 'BamSEC' is visible. Below it, a search bar contains 'Apple Inc.'. Underneath, there's a section titled 'Search in Documents' with a search input field containing 'share repurchase'. To the right of this section, there are two columns of search results. The first column, 'Transcripts', shows 23 results with three items listed: 'Earnings Q4 2016 Apple Inc Earnings Call 10/25/16', 'Earnings Q3 2016 Apple Inc Earnings Call 07/26/16', and 'Earnings Q2 2016 Apple Inc Earnings Call 04/26/16'. The second column, 'News', shows 17 results with one item listed: 'EX-99.1 Apple Reports Fourth Quarter ... 10/25/16'. On the right side of the interface, there are several text snippets from documents, with the word 'share repurchase' highlighted in green in several places. A button at the top right says 'Open standalone transcript in a new tab'.

Bamsec Getting Started Document Search, *available at* <https://help.bamsec.com/docs/getting-started> (Ex. W).

103. The first element of claim 10 further requires at least one processor that is operable as described above, and:

wherein the user query includes:

information identifying a publicly traded company;

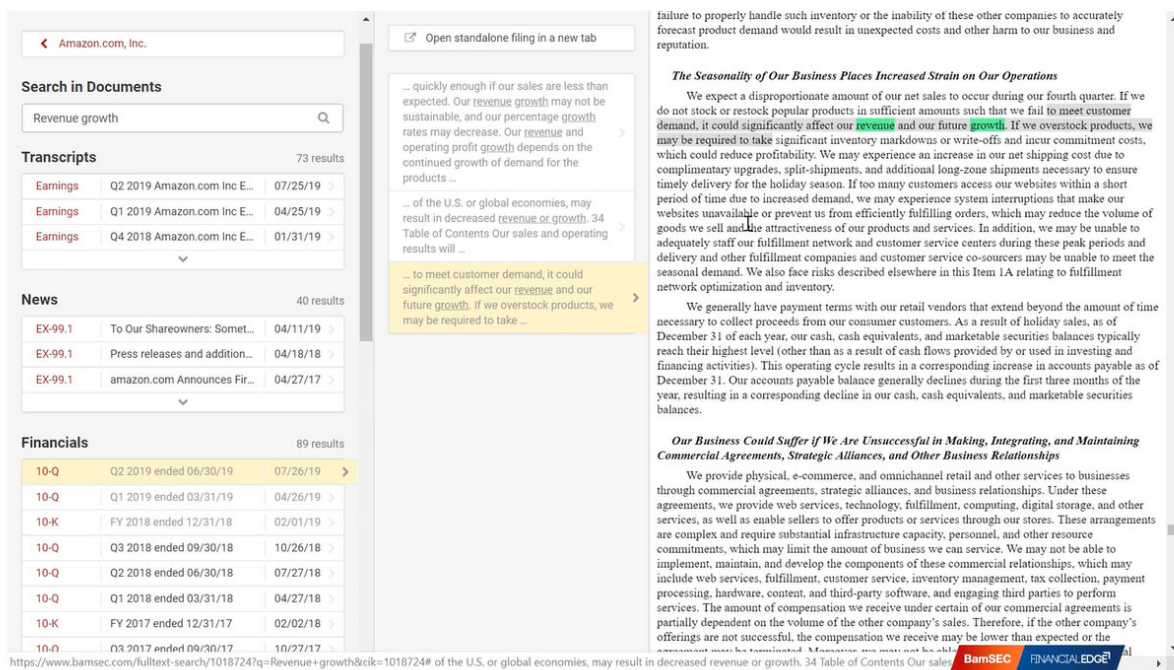
a first keyword distinct from the publicly traded company; and

a second keyword distinct from the first keyword and the publicly traded company;

104. On information and belief, the Bamsec Platform includes at least one server that has been and is configured and operable to receive queries that include information identifying a

publicly traded company, a first keyword distinct from the publicly traded company, and a second keyword distinct from the first keyword and the publicly traded company. For example, on information and belief, the Bamsec Platform user queries include information identifying a publicly traded company (e.g., Amazon.com, Inc., Apple Inc., etc.) and distinct first and second keywords (e.g., “revenue” and “growth” or “share” and “repurchase”).

This video provides a quick overview of how to run a search and navigate results. For step-by-step instructions, jump to [Running a Search](#) below.



Bamsec Revenue-Growth Search, *see video available at* <https://help.bamsec.com/docs/document-search>; <https://help.bamsec.com/docs/training-videos> (Document Search Fundamentals) (Ex. X).

105. The second element of claim 10 requires at least one processor that is operable for: executing a search based on the user query;

106. On information and belief, the Bamsec Platform has been and is configured and operable to execute a search based on the user query, for example, as reflected in the screenshots herein showing searches and search results.

107. The third element of claim 10 requires at least one processor that is operable for:

generating search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company in the query, the search results containing snippets of text from within the financial documents,

wherein a snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document;

108. On information and belief, the Bamsec Platform includes at least one server that has been and is configured and operable to generate search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company in the query, the search results containing snippets of text from within the financial documents, wherein a snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document. For example, on information and belief and as reflected in the screenshot below, the Bamsec Platform is configured and operable to generate search results (e.g., middle pane below) with identified snippets of text in the financial document. Additionally, on information and belief, the snippet of text is identified by the Bamsec platform when the first and second keywords appear within a default number of words such as 10 words. Further, on information and belief, the maximum number of words may be configurable using advanced document search operators.

The screenshot displays the BamSEC search interface for Amazon.com, Inc. The left sidebar shows search results categorized into Transcripts (1 result), News (8 results), Financials (69 results), Legal opinion (1 result), and Prospectuses and Registration Statements (8 results). The main content area shows a search result snippet for a financial document, which is expanded to show a table of debt obligations.

Note 5 — DEBT

As of June 30, 2019, we had \$24.3 billion of unsecured senior notes outstanding (the "Notes"). As of December 31, 2018 and June 30, 2019, the net unamortized discount and debt issuance costs on the Notes was \$101 million. We also have other long-term debt with a carrying amount, including the current portion and borrowings under our credit facility, of \$715 million and \$816 million as of December 31, 2018 and June 30, 2019. The face value of our total long-term debt obligations is as follows (in millions):

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
4.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

(1) Issued in November 2012, effective interest rate of the 2022 Notes was 2.66%.
 (2) Issued in December 2014, effective interest rates of the 2019, 2021, 2024, 2034, and 2044 Notes were 2.73%, 3.43%, 3.90%, 4.92%, and 5.11%.
 (3) Issued in August 2017, effective interest rates of the 2020, 2023, 2024, 2027, 2037, 2047, and 2057 Notes were 2.16%, 2.56%, 2.95%, 3.25%, 3.94%, 4.23%, and 4.23%.

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

109. The fourth element of claim 10 requires at least one processor that is operable for: causing to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes:

a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document of the identified financial documents includes content provided by the publicly traded company,

wherein the list of financial documents is grouped according to a type of financial documents associated with publicly traded companies;

one or more of the identified snippets for selection by the user,

wherein the one or more of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents,

wherein the one or more of the identified snippets is from the user selected financial document;

text surrounding and containing a user selected snippet from the user selected financial document,

wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet,

wherein the user selected snippet is highlighted; and

a stock ticker or a name of the publicly traded company.

110. On information and belief, the Bamsec Platform includes at least one server that has been and is configured and operable to cause to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes: a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document of the identified financial documents includes content provided by the publicly traded company, wherein the list of financial documents is grouped according to a type of financial documents associated with publicly traded companies; one or more of the identified snippets for selection by the user, wherein the one or more of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents, wherein the one or more of the identified snippets is from the user selected financial document; text surrounding and containing a user selected snippet from the user selected financial document, wherein the at least a portion of the user selected snippet is displayed within the text surrounding the user selected snippet, wherein the user selected snippet is highlighted; and a stock ticker or a name of the publicly traded company. For example, on information and belief and as reflected in the screenshots below and herein, the Bamsec Platform is configured and operable to cause to render content from generated search results in a web and/or mobile user interface. On information and belief and as reflected herein, the rendered content includes a list of financial documents such as

SEC filings, transcripts, etc. associated with a publicly traded company grouped according to type (e.g., left pane below), one or more snippets associated with and displayed in response to user selection of one of the financial documents (e.g., middle pane below), text that surrounds and includes the user selected snippet (e.g., right pane below) from the selected financial document where the user selected snippet is highlighted, and the name of the publicly traded company (e.g., top left portion showing company name).

The screenshot displays the BamSEC search interface. On the left, a sidebar shows search results for "Amazon.com, Inc." categorized by Transcripts (1 result), News (8 results), Financials (69 results), Legal opinion (1 result), and Prospectuses and Registration Statements (8 results). The main search area shows a search for "[debt value]" with a search button. The selected document snippet is titled "Note 5 — DEBT" and discusses unsecured senior notes. Below the text is a table comparing debt obligations for December 31, 2018, and June 30, 2019.

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
4.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

111. As a direct and proximate consequence of Tegus’s and Bamsec’s infringements of AlphaSense’s ’739 Patent, AlphaSense has suffered damages in an amount not yet determined for which AlphaSense is entitled to relief. AlphaSense also seeks injunctive relief to prevent its ongoing harm stemming from these infringements.

COUNT IV

(The Tegos and Bamsec Platforms' Infringements of the '453 Patent)

112. All preceding paragraphs are incorporated by reference as if fully restated herein.

113. Since deploying its document search technology platform, Tegos has maintained, operated, used, and marketed the Tegos Platform for primarily the financial services industry. On information and belief, after acquiring Bamsec, Tegos has incorporated significant elements of the infringing Bamsec Platform into its Tegos Platform products accessible over the web and on mobile devices. The Tegos Platform is accessible through Tegos's website at www.tegus.com, Tegos's web portal at <https://app.tegus.co/>, and through its mobile applications. On information and belief, the Tegos Platform includes at least one server that is configured and operable to, and has been used to, provide search results of financial documents in a manner that infringes at least one claim in AlphaSense's '453 Patent.

114. Prior to its acquisition by Tegos, Bamsec was an independent document search application that was marketed, maintained, and operated by its then owners as a means of aggregating, navigating, searching, and displaying relevant financial content and data. After acquiring Bamsec, Tegos continued to operate it in this fashion as a standalone application. Tegos also markets Bamsec as Bamsec by Tegos and makes Bamsec available on its website. On information and belief, Bamsec is available via the websites, www.bamsec.com and www.tegus.com. On information and belief, the Bamsec Platform includes at least one server that is configured and operable to, and has been used to, provide search results in a manner that infringes at least one claim in AlphaSense's '453 Patent.

115. The preamble of claim 10 of the '453 Patent states:

10. A system for rendering information from a database onto a user interface, the system comprising a server operable to:

116. On information and belief, to the extent that this claim element is determined to be limiting, the Tegos and Bamsec Platforms provide a system for rendering information from one or more databases into the Bamsec and Tegos web applications and/or mobile UI's. For example, on information and belief, the Tegos and Bamsec Platforms provide a system configured and operable to render information about financial and other documents based on queries and include at least one server.

117. The first element of claim 10 requires a server that is operable to:

receiving a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of financial documents,

118. On information and belief, the Tegos and Bamsec Platforms include at least one server that has been and is configured to receive a query from a user at the remote computer to search within a database, wherein the database comprises a plurality of financial documents. For example, on information and belief, the Tegos and Bamsec Platforms are configured and operable to receive queries from users to search financial documents such as filings and transcripts included within one or more databases (e.g., "Search in Documents").

Document Search

Use [Document Search](#) to instantly find any text within all filings and transcripts for a company. Quickly find out if Management has mentioned a key term on an earnings call or find all of the buried references to an obscure subsidiary in the filings. No more looking through documents one by one, and you can say **goodbye to Ctrl-F**.

The screenshot displays the BamSEC search interface for Apple Inc. The search term is 'share repurchase'. The results are categorized into Transcripts (23 results) and News (17 results). A transcript snippet is highlighted, showing text about share repurchases and dividends. The text in the snippet is: '... in dividends and equivalent. We spent \$4 billion on repurchases of 41.2 million Apple shares to open market transactions, and we launched a new \$6 ...' and '... in initial delivery and retirement of 48.2 million shares. We also completed our sixth accelerated share repurchase program retiring an additional 8.7 million shares. We've now completed almost \$177 billion of our current ...' and '... billion capital return program including \$127 billion in share repurchases. During the quarter we also spent \$1 billion on a minority ...'.

Bamsec Getting Started Document Search, *available at* <https://help.bamsec.com/docs/getting-started> (Ex. W).

119. The first element of claim 10 further requires a server that is configured as described above, and:

wherein the user query includes:

information identifying a publicly traded company;

a first keyword distinct from the publicly traded company; and

a second keyword distinct from the first keyword and the publicly traded company;

120. On information and belief, the Tegos and Bamsec Platforms include at least one server that has been and is configured and operable to receive queries that include information identifying a publicly traded company, a first keyword distinct from the publicly traded company, and a second keyword distinct from the first keyword and the publicly traded company. For example, on information and belief, the Tegos and Bamsec Platform user queries include

information identifying a publicly traded company (e.g., Amazon.com, Inc., Apple Inc., etc.) and distinct first and second keywords (e.g., “revenue” and “growth” or “share” and “repurchase”).

This video provides a quick overview of how to run a search and navigate results. For step-by-step instructions, jump to [Running a Search](#) below.

The screenshot displays the BamSEC search interface. At the top, the search bar contains 'Amazon.com, Inc.' and the search query is 'Revenue growth'. The results are categorized into Transcripts (73 results), News (40 results), and Financials (89 results). The Financials section is expanded, showing a list of documents with columns for document type (e.g., 10-Q, 10-K), date, and a right-pointing arrow. A snippet of text from a document is highlighted in yellow, showing a sentence about revenue and growth. The snippet reads: '... quickly enough if our sales are less than expected. Our revenue growth may not be sustainable, and our percentage growth rates may decrease. Our revenue and operating profit growth depends on the continued growth of demand for the products ...'.

Bamsec Revenue-Growth Search, *see video available at* <https://help.bamsec.com/docs/document-search>; <https://help.bamsec.com/docs/training-videos> (Document Search Fundamentals) (Ex. X).

121. The second element of claim 10 requires a server configured to:

executing a search based on the user query;

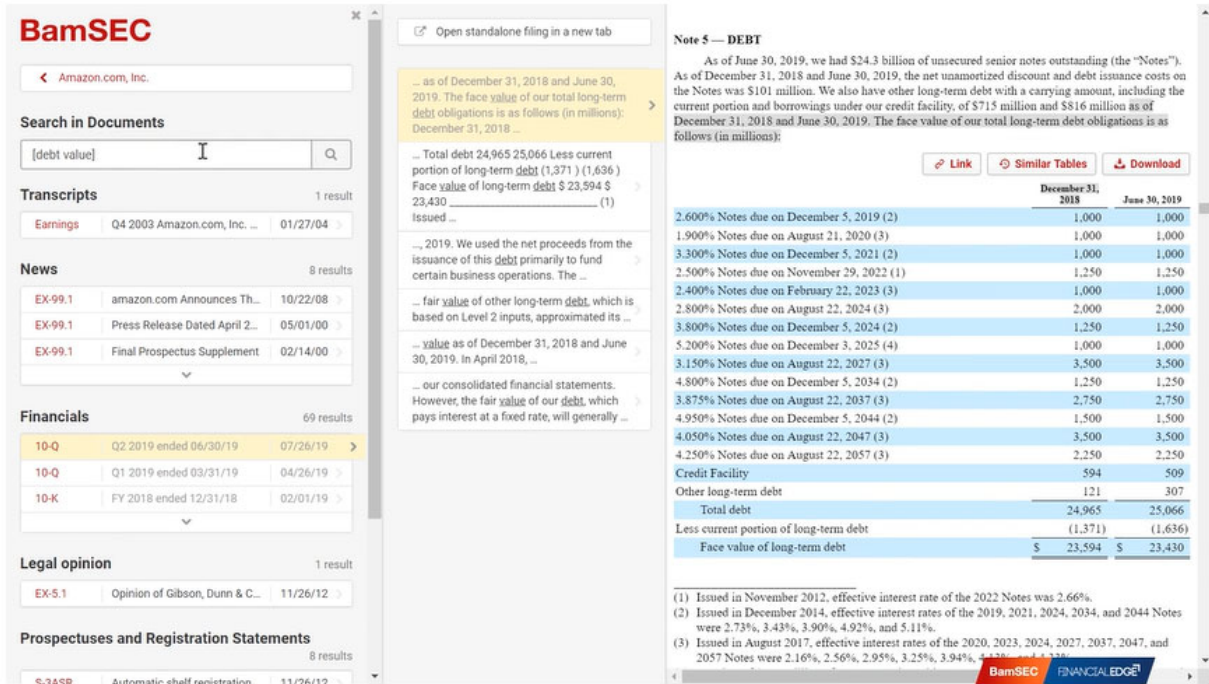
122. On information and belief, the Tegus and Bamsec Platforms have been and are configured and operable to execute a search based on the user query, for example, as reflected in the screenshots herein showing searches and search results.

123. The third element of claim 10 requires a server that is configured to:

generating search results in response to executing the search, wherein the search results include financial documents associated with the publicly traded company in the query and that contain identified snippets of text from within the financial documents, wherein the identified snippets comprise a complete sentence,

wherein the snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document;

124. On information and belief, the Tegos and Bamsec Platforms include at least one server that has been and is configured and operable to generate search results in response to executing the search wherein the search results include financial documents associated with the publicly traded company in the query and that contain identified snippets of text from within the financial documents, wherein the identified snippets comprise a complete sentence, and wherein the snippet of text is identified when the first keyword appears within a defined maximum distance from the second keyword in a searched financial document. For example, on information and belief and as reflected in the screenshot below, the Tegos and Bamsec Platforms are configured and operable to generate search results (e.g., middle pane below) with identified snippets of text in the financial document that are a complete sentence. Additionally, on information and belief, the snippet of text is identified by the Tegos and Bamsec platforms when the first and second keywords appear within a default number of words such as 10 words. Further, on information and belief, the maximum number of words may be configurable using advanced document search operators.



Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

125. The fourth element of claim 10 requires a server that is configured to:

causing to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes:

a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document includes content associated with the publicly traded company;

one or more of the identified snippets for selection by the user,

wherein the one or more of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents,

wherein the one or more of the identified snippets is from the user selected financial document;

text surrounding and containing a user selected snippet from the user selected financial document,

wherein the at least a portion of the user selected snippet is highlighted within the text surrounding the user selected snippet; and

a stock ticker or a name of the publicly traded company.

126. On information and belief, the Tegos and Bamsec Platforms include at least one server that has been and is configured and operable to cause to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes: a list of identified financial documents for selection by the user, wherein the list of identified financial documents is associated with the publicly traded company, and at least one document includes content associated with the publicly traded company; one or more of the identified snippets for selection by the user, wherein the one or more of the identified snippets is displayed in response to a selection of a financial document by the user from the list of identified financial documents, wherein the one or more of the identified snippets is from the user selected financial document; text surrounding and containing a user selected snippet from the user selected financial document, wherein the at least a portion of the user selected snippet is highlighted within the text surrounding the user selected snippet; and a stock ticker or a name of the publicly traded company. For example, on information and belief and as reflected in the screenshots below and herein, the Tegos and Bamsec Platforms are configured and operable to cause to render content from generated search results in a web and/or mobile user interface. On information and belief and as reflected herein, the rendered content includes a list of financial documents such as SEC filings, transcripts, etc. associated with a publicly traded company (e.g., left pane below), a plurality of snippets associated with and displayed in response to user selection of one of the financial documents (e.g., middle pane below), text that surrounds and includes the user selected snippet with at least a portion of the user selected snippet highlighted (e.g., right pane below), and the name of the publicly traded company (e.g., top left portion showing company name).

The screenshot displays the BamSEC search interface. On the left, a search bar contains 'Amazon.com, Inc.' and a search for '[debt value]' is shown. Below are sections for Transcripts (1 result), News (8 results), Financials (69 results), Legal opinion (1 result), and Prospectuses and Registration Statements (8 results). The main content area shows search results for 'debt value', including a snippet about long-term debt obligations and a table for 'Note 5 - DEBT'.

Note 5 — DEBT

As of June 30, 2019, we had \$24.3 billion of unsecured senior notes outstanding (the “Notes”). As of December 31, 2018 and June 30, 2019, the net unamortized discount and debt issuance costs on the Notes was \$101 million. We also have other long-term debt with a carrying amount, including the current portion and borrowings under our credit facility, of \$715 million and \$816 million as of December 31, 2018 and June 30, 2019. The face value of our total long-term debt obligations is as follows (in millions):

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
4.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

Footnotes:
 (1) Issued in November 2012, effective interest rate of the 2022 Notes was 2.66%.
 (2) Issued in December 2014, effective interest rates of the 2019, 2021, 2024, 2034, and 2044 Notes were 2.73%, 3.43%, 3.90%, 4.92%, and 5.11%.
 (3) Issued in August 2017, effective interest rates of the 2020, 2023, 2024, 2027, 2037, 2047, and 2057 Notes were 2.16%, 2.56%, 2.95%, 3.25%, 3.94%, 4.23%, and 4.23%.

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

127. As a direct and proximate consequence of Tegus’s and Bamsec’s infringements of AlphaSense’s ’453 Patent, AlphaSense has suffered damages in an amount not yet determined for which AlphaSense is entitled to relief. AlphaSense also seeks injunctive relief to prevent its ongoing harm stemming from these infringements.

COUNT V

(The Bamsec Platform’s Infringement of the ’218 Patent)

128. All preceding paragraphs are incorporated by reference as if fully restated herein.

129. Prior to its acquisition by Tegus, Bamsec was an independent document search application that was marketed, maintained, and operated by its then owners as a means of aggregating, navigating, searching, and displaying relevant financial content and data. After acquiring Bamsec, Tegus continued to operate it in this fashion as a standalone application. Tegus also markets Bamsec as Bamsec by Tegus and makes Bamsec available on its website. On

information and belief, Bamsec is available via the websites, www.bamsec.com and www.tegus.com.

130. On information and belief, the Bamsec Platform includes at least one processor that is configured to, and has been used to, provide search results in a manner that infringes at least one claim in AlphaSense's '218 Patent.

131. The preamble of claim 1 of the '218 Patent states:

A system for rendering information from a database onto a user interface of a remote computer, the system comprising one or more processors operable to:

132. On information and belief, to the extent that this claim element is determined to be limiting, the Bamsec Platform provides a system for rendering information from one or more databases into the Bamsec and/or Tegus web applications and/or mobile UI's. For example, on information and belief, the Bamsec Platform provides a system configured and operable to render information about financial and other documents based on queries that includes one or more processors.

133. The first element of claim 1 requires at least one processor that is operable to:

receive a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of documents, wherein the documents are related to at least one publicly traded company,

134. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to receive a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of documents, wherein the documents are related to at least one publicly traded company. For example, on information and belief, the Bamsec Platform is configured and operable to receive queries from users to search documents related to publicly traded companies such as filings and transcripts included within one or more databases (e.g., "Search in Documents").

Document Search

Use **Document Search** to instantly find any text within all filings and transcripts for a company. Quickly find out if Management has mentioned a key term on an earnings call or find all of the buried references to an obscure subsidiary in the filings. No more looking through documents one by one, and you can say **goodbye to Ctrl-F**.

BamSEC

Open standalone transcript in a new tab

Apple Inc.

Search in Documents

share repurchase

Transcripts 23 results

Earnings	Q4 2016 Apple Inc Earnings Call	10/25/16
Earnings	Q3 2016 Apple Inc Earnings Call	07/26/16
Earnings	Q2 2016 Apple Inc Earnings Call	04/26/16

News 17 results

EX-99.1	Apple Reports Fourth Quarter ...	10/25/16
---------	----------------------------------	----------

... in dividends and equivalent. We spent \$4 billion on **repurchases** of 41.2 million Apple **shares** to open market transactions, and we launched a new \$6 ...

... in initial delivery and retirement of 48.2 million **shares**. We also completed our sixth accelerated **share repurchase** program retiring an additional 8.7 million **shares**. We've now completed almost \$177 billion of our current ...

... billion capital return program including \$127 billion in **share repurchases**. During the quarter we also spent \$1 billion on a minority ...

Let me now turn to our sequential decrease of total \$2.4 billion of debt at the end of the quarter.

We returned a total of \$6 billion of **equivalent**. We spent \$6 billion ASR **share repurchase** program.

We've now completed **repurchases**. During the quarter we also spent \$1 billion on a minority ...

We expect revenue to be about 25.5% payable on August 11,

Bamsec Getting Started Document Search, *available at* <https://help.bamsec.com/docs/getting-started> (Ex. W).

135. The first element of claim 1 further requires at least one processor that is configured as described above, and:

wherein the user query includes:

information identifying a publicly traded company of the at least one publicly traded companies;

a first keyword distinct from the publicly traded company; and

a second keyword distinct from the first keyword and the publicly traded company;

136. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to receive queries that include information identifying a publicly traded company of the at least one publicly traded companies; a first keyword distinct from the publicly traded company; and a second keyword distinct from the first keyword and the publicly traded company. For example, on information and belief, the Bamsec Platform user queries include information identifying a publicly traded company (e.g., Amazon.com, Inc., Apple

Inc., etc.) and distinct first and second keywords (e.g., “revenue” and “growth” or “share” and “repurchase”).

This video provides a quick overview of how to run a search and navigate results. For step-by-step instructions, jump to [Running a Search](#) below.

The screenshot displays the BamSEC search results for the query "Revenue growth" on Amazon.com, Inc. The interface is divided into several sections:

- Search Bar:** Contains the text "Amazon.com, Inc." and "Revenue growth".
- Transcripts:** A section with 73 results, listing earnings reports such as "Q2 2019 Amazon.com Inc E..." and "Q1 2019 Amazon.com Inc E...".
- News:** A section with 40 results, listing press releases and announcements such as "To Our Shareowners: Somet..." and "amazon.com Announces Fir...".
- Financials:** A section with 89 results, listing quarterly and yearly financial reports such as "Q2 2019 ended 06/30/19" and "FY 2018 ended 12/31/18".
- Main Content Area:** Displays a snippet of text from a document, highlighting the phrase "revenue and our future growth".

The URL at the bottom of the screenshot is: <https://www.bamsec.com/fulltext-search/1018724?q=Revenue+growth&ck=1018724#>

Bamsec Revenue-Growth Search, *see video available at* <https://help.bamsec.com/docs/document-search>; <https://help.bamsec.com/docs/training-videos> (Document Search Fundamentals) (Ex. X).

137. The second element of claim 1 requires at least one processor that is configured to:
execute a search based on the user query;

138. On information and belief, the Bamsec Platform has been and is configured and operable to execute a search based on the user query, for example, as reflected in the screenshots herein showing searches and search results.

139. The third element of claim 1 requires at least one processor that is configured to:
generate search results in response to executing the search, wherein the search results include documents associated with the publicly traded company in the user query and that contain an identified snippet of text from within the documents, wherein the identified snippet of text comprises a complete sentence, and

wherein a snippet of text is identified based on the first keyword or the second keyword appearing in a searched document;

140. On information and belief, the Bamsec Platform includes at least one processor that is configured generate search results in response to executing the search, wherein the search results include documents associated with the publicly traded company in the user query and that contain an identified snippet of text from within the documents, wherein the identified snippet of text comprises a complete sentence, and wherein a snippet of text is identified based on the first keyword or the second keyword appearing in a searched document. For example, on information and belief and as reflected in the screenshot below, the Bamsec Platform is configured and operable to generate search results (e.g., middle pane below) with identified snippets of text in the documents that include complete sentences. Additionally, on information and belief, the snippet of text is identified by the Bamsec platform when the first and second keywords appear within the searched document.

The screenshot displays the BamSEC search interface. On the left, the search bar contains "Amazon.com, Inc." and the search results are categorized into Transcripts (1 result), News (8 results), Financials (69 results), Legal opinion (1 result), and Prospectuses and Registration Statements (8 results). The middle pane shows a search result snippet for "Total debt 24,965,25,066 Less current portion of long-term debt (1,371) (1,636) Face value of long-term debt \$ 23,594 \$ 23,430". The right pane shows the full document snippet for "Note 5 — DEBT", which includes a table of debt obligations for Amazon.com, Inc. as of December 31, 2018 and June 30, 2019.

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
4.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

141. The fourth element of claim 1 requires at least one processor that is configured to:

cause to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes at least one of the one or more identified snippets;

142. On information and belief, the Bamsec Platform includes at least one processor that is configured to cause to render, on a viewing portion of the user interface, content from the generated search results, wherein the rendered content includes at least one of the one or more identified snippets. For example, on information and belief and as reflected in the screenshots below and herein, the Bamsec Platform is configured and operable to cause to render content from generated search results in a web and/or mobile user interface that includes one or more of the identified snippets (e.g., middle pane below).

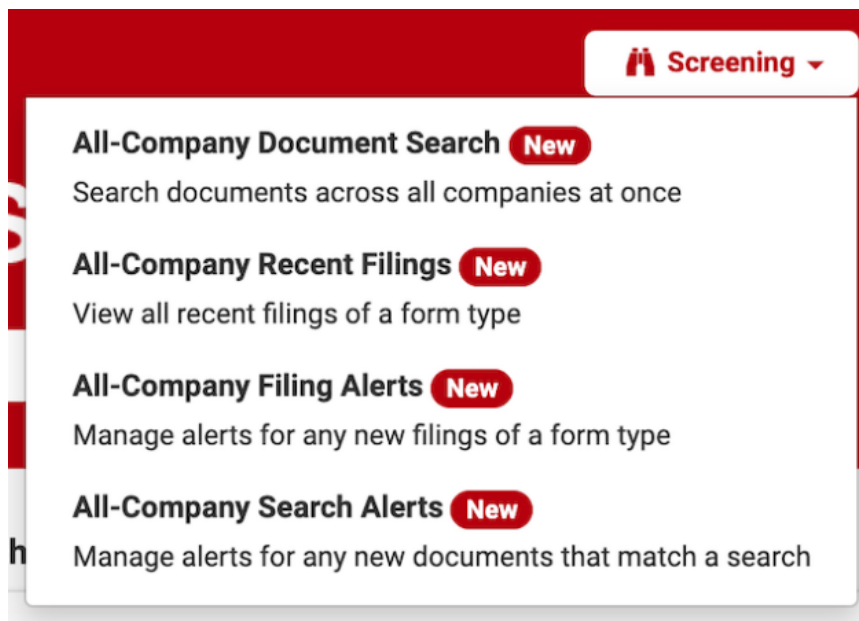
The screenshot displays the BamSEC search interface. On the left, a search bar contains 'Amazon.com, Inc.' and a search for '[debt value]' yields results in Transcripts, News, Financials, Legal opinion, and Prospectuses. The main pane shows a snippet from a document discussing debt obligations as of December 31, 2018 and June 30, 2019. The right pane displays 'Note 5 — DEBT' with a table of debt obligations and their face values.

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
4.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

143. The fifth element of claim 1 requires at least one processor that is configured to:
detect one or more new documents in the database;

144. On information and belief, the Bamsec Platform includes at least one processor that is configured to detect one or more new documents in the database. For example, on information and belief and as reflected below, the Bamsec Platform is configured and operable to detect one or more new documents in the database such as in connection with search alerts.



Bamsec Search Alerts *available at* <https://help.bamsec.com/docs/all-company-filings-alerts> and <https://help.bamsec.com/docs/all-company-search-alerts>.

All-Company Search Alerts

Receive a twice-daily email digest with new filings and transcripts matching any search query. [Learn More](#)

[← Back](#)

Edit Email Alert

Query Advanced Operators

solar panel

<p>Market Cap</p> <p><input checked="" type="checkbox"/> Large ≥\$10bn</p> <p><input checked="" type="checkbox"/> Mid \$2bn–\$10bn</p> <p><input type="checkbox"/> Small \$300mm–\$2bn</p> <p><input type="checkbox"/> Micro <\$300mm</p> <p><input type="checkbox"/> Private or No Market Cap</p>	<p>Industries</p> <p>All Edit</p>	<p>Document Categories</p> <p><input checked="" type="checkbox"/> Transcripts</p> <hr/> <p><input checked="" type="checkbox"/> Financials</p> <p><input checked="" type="checkbox"/> News</p> <p><input checked="" type="checkbox"/> Prospectuses and Registrations</p> <p><input checked="" type="checkbox"/> Proxies</p> <p><input checked="" type="checkbox"/> Ownership</p> <p><input checked="" type="checkbox"/> Other</p>
--	---	---

Cancel Save

Bamsec All Company Search Alerts available at <https://help.bamsec.com/docs/all-company-search-alerts>.

BamSEC

Screening ▾
Help Center

All-Company Filing Alerts

Receive an email any time there is a new filing of a given type across all companies. [Learn More](#)

New Securities Registrations

S-1 Initial registration of new securities	<input checked="" type="checkbox"/>	Edit	✕ Amendments No filters	~25/week at peaks
S-11 Initial registration of new securities for REITs	<input type="checkbox"/>	Edit	✕ Amendments No filters	~5/week at peaks
10-12B Initial registration of securities for a spinoff	<input type="checkbox"/>	Edit	✕ Amendments No filters	~10/week at peaks
10-12G Initial registration of new class of securities	<input type="checkbox"/>	Edit	✕ Amendments No filters	~10/week at peaks
F-1 Initial registration of new securities for foreign issuers	<input type="checkbox"/>	Edit	✕ Amendments No filters	~10/week at peaks
F-10 Initial registration of new securities for Canadian	<input type="checkbox"/>	Edit	✕ Amendments No filters	~5/week at peaks

Bamsec All Company Search Alerts available at <https://help.bamsec.com/docs/all-company-filings-alerts>

145. The sixth element of claim 1 requires at least one processor that is configured to:

in response to detecting the one or more new documents in the database, generate a report based on the user query,

wherein the report comprises a new identified snippet of text and an identification of a new document of the one or more new documents,

wherein the new document is associated with the new identified snippet of text,

wherein the new identified snippet of text is identified based on the first keyword or the second keyword appearing in the new document;

146. On information and belief, the Bamsec Platform includes at least one processor that is configured to, in response to detecting the one or more new documents in the database, generate a report based on the user query, wherein the report comprises a new identified snippet of text and an identification of a new document of the one or more new documents, wherein the new document is associated with the new identified snippet of text, and wherein the new identified snippet of text is identified based on the first keyword or the second keyword appearing in the new document. For example, on information and belief, the Bamsec Platform is configured and operable such that when a new document is identified with the first or second keyword appearing in the document an email is generated that is associated with and/or references a new identified snippet of text associated with the document.

147. The seventh element of claim 1 requires at least one processor that is configured to:

cause to render at least a portion of the new document from the report on the user interface,

wherein the rendered portion of the new document includes the new identified snippet of text, and wherein at least a portion of the new identified snippet of text is highlighted in the rendered portion of the new document.

148. On information and belief, the Bamsec Platform includes at least one processor that is configured to cause to render at least a portion of the new document from the report on the user interface, wherein the rendered portion of the new document includes the new identified snippet

of text, and wherein at least a portion of the new identified snippet of text is highlighted in the rendered portion of the new document. For example, on information and belief, the Bamsec Platform is configured and operable to cause to render at least a portion of the new document on the user interface which includes the new snippet highlighted in the rendered portion of the document (e.g, the right pane in the Bamsec search interface).

149. As a direct and proximate consequence of Tegus's and Bamsec's infringements of AlphaSense's '218 Patent, AlphaSense has suffered damages in an amount not yet determined for which AlphaSense is entitled to relief. AlphaSense also seeks injunctive relief to prevent its ongoing harm stemming from these infringements.

COUNT VI

(The Bamsec Platform's Infringement of the '006 Patent)

150. All preceding paragraphs are incorporated by reference as if fully restated herein.

151. Prior to its acquisition by Tegus, Bamsec was an independent document search application that was marketed, maintained, and operated by its then owners as a means of aggregating, navigating, searching, and displaying relevant financial content and data. After acquiring Bamsec, Tegus continued to operate it in this fashion as a standalone application. Tegus also markets Bamsec as Bamsec by Tegus and makes Bamsec available on its website. On information and belief, Bamsec is available via the websites, www.bamsec.com and www.tegus.com.

152. On information and belief, the Bamsec Platform includes at least one processor that is configured to, and has been used to, provide search results in a manner that infringes at least one claim in AlphaSense's '006 Patent.

153. The preamble of claim 1 of the '006 Patent states:

1. A system for rendering information from a database onto a user interface of a remote computer, the system comprising one or more processors operable to:

154. On information and belief, to the extent that this claim element is determined to be limiting, the Bamsec Platform provides a system for rendering information from one or more databases into the Bamsec and/or Tegos web applications and/or mobile UI's. For example, on information and belief, the Bamsec Platform provides a system configured and operable to render information about financial and other documents based on queries that includes one or more processors.

155. The first element of claim 1 requires at least one processor that is operable to:

receive a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of documents, wherein the documents are related to at least one publicly traded company,

156. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to receive a query from a user at the remote computer to search within the database, wherein the database comprises a plurality of documents, wherein the documents are related to at least one publicly traded company. For example, on information and belief, the Bamsec Platform is configured and operable to receive queries from users to search documents related to one or more public companies such as filings and transcripts included within one or more databases (e.g., "Search in Documents").

Document Search

Use **Document Search** to instantly find any text within all filings and transcripts for a company. Quickly find out if Management has mentioned a key term on an earnings call or find all of the buried references to an obscure subsidiary in the filings. No more looking through documents one by one, and you can say **goodbye to Ctrl-F**.

The screenshot displays the BamSEC interface for searching documents related to Apple Inc. The search term 'share repurchase' is entered in the search bar. The results are categorized into Transcripts (23 results) and News (17 results). A transcript snippet is highlighted, showing text about share repurchases and dividends. The text in the snippet includes: '... in dividends and equivalent. We spent \$4 billion on repurchases of 41.2 million Apple shares to open market transactions, and we launched a new \$6 ...', '... in initial delivery and retirement of 48.2 million shares. We also completed our sixth accelerated share repurchase program retiring an additional 8.7 million shares. We've now completed almost \$177 billion of our current ...', and '... billion capital return program including \$127 billion in share repurchases. During the quarter we also spent \$1 billion on a minority ...'. The interface also shows a search bar with 'Apple Inc.' and a search bar with 'share repurchase'.

Bamsec Getting Started Document Search, *available at* <https://help.bamsec.com/docs/getting-started> (Ex. W).

157. The first element of claim 1 further requires at least one processor that is configured as described above, and:

wherein the user query includes:

information identifying a publicly traded company of the at least one publicly traded companies;

a first keyword distinct from the publicly traded company; and

a second keyword distinct from the first keyword and the publicly traded company;

158. On information and belief, the Bamsec Platform includes at least one processor that has been and is configured and operable to receive queries that include information identifying a publicly traded company of the at least one publicly traded companies; a first keyword distinct from the publicly traded company; and a second keyword distinct from the first keyword and the publicly traded company. For example, on information and belief, the Bamsec Platform user queries include information identifying a publicly traded company (e.g., Amazon.com, Inc., Apple

Inc., etc.) and distinct first and second keywords (e.g., “revenue” and “growth” or “share” and “repurchase”).

This video provides a quick overview of how to run a search and navigate results. For step-by-step instructions, jump to [Running a Search](#) below.

The screenshot displays the BamSEC search results for the query "Revenue growth" on Amazon.com, Inc. The interface is divided into several sections:

- Search Bar:** Contains the text "Amazon.com, Inc." and "Revenue growth".
- Transcripts:** A section with 73 results, listing earnings reports such as "Q2 2019 Amazon.com Inc E..." and "Q1 2019 Amazon.com Inc E...".
- News:** A section with 40 results, listing press releases and announcements such as "To Our Shareowners: Somet..." and "amazon.com Announces Fir...".
- Financials:** A section with 89 results, listing quarterly and yearly financial reports such as "Q2 2019 ended 06/30/19" and "FY 2018 ended 12/31/18".
- Main Content Area:** Displays a snippet of text from a document, highlighting the words "revenue" and "growth" in yellow. The snippet discusses the seasonality of business operations and the impact of inventory and demand on revenue and growth.

Bamsec Revenue-Growth Search, *see video available at* <https://help.bamsec.com/docs/document-search>; <https://help.bamsec.com/docs/training-videos> (Document Search Fundamentals) (Ex. X).

159. The second element of claim 1 requires at least one processor that is configured to:
execute a search based on the user query;

160. On information and belief, the Bamsec Platform has been and is configured and operable to execute a search based on the user query, for example, as reflected in the screenshots herein showing searches and search results.

161. The third element of claim 1 requires at least one processor that is configured to:
generate search results in response to executing the search, wherein the search results include documents associated with the publicly traded company in the user query and that contain an identified snippet of text from within the documents, wherein the identified snippet of text comprises a complete sentence, and

wherein the snippet of text is identified when the first keyword or the second keyword appears in a searched document;

162. On information and belief, the Bamsec Platform includes at least one processor that is configured to generate search results in response to executing the search, wherein the search results include documents associated with the publicly traded company in the user query and that contain an identified snippet of text from within the documents, wherein the identified snippet of text comprises a complete sentence, and wherein the snippet of text is identified when the first keyword or the second keyword appears in a searched document. For example, on information and belief and as reflected in the screenshot below, the Bamsec Platform is configured and operable to generate search results (e.g., middle pane below) with identified snippets of text in the documents that include complete sentences. Additionally, on information and belief, the snippet of text is identified by the Bamsec platform when the first and/or second keywords appear within the searched document.

The screenshot displays the BamSEC search interface for Amazon.com, Inc. The search results are categorized into Transcripts, News, Financials, Legal opinion, and Prospectuses and Registration Statements. The 'Financials' section is highlighted, showing a search result for '10-Q' dated 07/26/19. The document snippet shows the following text:

... as of December 31, 2018 and June 30, 2019. The face value of our total long-term debt obligations is as follows (in millions):

	December 31, 2018	June 30, 2019
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

The snippet also includes a table of debt obligations:

	December 31, 2018	June 30, 2019
2.600% Notes due on December 5, 2019 (2)	1,000	1,000
1.900% Notes due on August 21, 2020 (3)	1,000	1,000
3.300% Notes due on December 5, 2021 (2)	1,000	1,000
2.500% Notes due on November 29, 2022 (1)	1,250	1,250
2.400% Notes due on February 22, 2023 (3)	1,000	1,000
2.800% Notes due on August 22, 2024 (3)	2,000	2,000
3.800% Notes due on December 5, 2024 (2)	1,250	1,250
5.200% Notes due on December 3, 2025 (4)	1,000	1,000
3.150% Notes due on August 22, 2027 (3)	3,500	3,500
4.800% Notes due on December 5, 2034 (2)	1,250	1,250
3.875% Notes due on August 22, 2037 (3)	2,750	2,750
4.950% Notes due on December 5, 2044 (2)	1,500	1,500
4.050% Notes due on August 22, 2047 (3)	3,500	3,500
4.250% Notes due on August 22, 2057 (3)	2,250	2,250
Credit Facility	594	509
Other long-term debt	121	307
Total debt	24,965	25,066
Less current portion of long-term debt	(1,371)	(1,636)
Face value of long-term debt	\$ 23,594	\$ 23,430

The document also includes footnotes regarding the effective interest rates of the notes.

Bamsec Advanced Operators Search, *see video available at* <https://help.bamsec.com/docs/document-search-advanced-operators>; <https://help.bamsec.com/docs/training-videos> (Ex. Y).

163. The fourth element of claim 1 requires at least one processor that is configured to:
- in response to one or more new documents in the database of the plurality of documents, generate a report based on the search,
- wherein the report comprises a new identified snippet of text and an identification of a new document of the one or more new documents,
- wherein the new document is associated with the new identified snippet of text;

164. On information and belief, the Bamsec Platform includes at least one processor that is configured to, in response to one or more new documents in the database of the plurality of documents, generate a report based on the search, wherein the report comprises a new identified snippet of text and an identification of a new document of the one or more new documents, wherein the new document is associated with the new identified snippet of text. For example, on information and belief, the Bamsec Platform is configured and operable such that when a new document is identified based on the search, an email is generated that is associated with and/or references a new identified snippet of text in the document.

Screening ▾

- All-Company Document Search** **New**
Search documents across all companies at once
- All-Company Recent Filings** **New**
View all recent filings of a form type
- All-Company Filing Alerts** **New**
Manage alerts for any new filings of a form type
- All-Company Search Alerts** **New**
Manage alerts for any new documents that match a search

Bamsec Search Alerts *available at* <https://help.bamsec.com/docs/all-company-filings-alerts> and <https://help.bamsec.com/docs/all-company-search-alerts>.

All-Company Search Alerts

Receive a twice-daily email digest with new filings and transcripts matching any search query. [Learn More](#)

[← Back](#)

Edit Email Alert

Query Advanced Operators

solar panel

Market Cap <ul style="list-style-type: none"><input checked="" type="checkbox"/> Large ≥\$10bn<input checked="" type="checkbox"/> Mid \$2bn-\$10bn<input type="checkbox"/> Small \$300mm-\$2bn<input type="checkbox"/> Micro <\$300mm<input type="checkbox"/> Private or No Market Cap	Industries <p>All Edit</p>	Document Categories <ul style="list-style-type: none"><input checked="" type="checkbox"/> Transcripts<input checked="" type="checkbox"/> Financials<input checked="" type="checkbox"/> News<input checked="" type="checkbox"/> Prospectuses and Registrations<input checked="" type="checkbox"/> Proxies<input checked="" type="checkbox"/> Ownership<input checked="" type="checkbox"/> Other
--	--	---

Cancel Save

Bamsec All Company Search Alerts *available at* <https://help.bamsec.com/docs/all-company-search-alerts>.

BamSEC Ticker or company name Screening - Help Center

All-Company Filing Alerts
Receive an email any time there is a new filing of a given type across all companies. [Learn More](#)

New Securities Registrations

S-1 Initial registration of new securities	<input checked="" type="checkbox"/>	Edit	✕ Amendments No filters	~25/week at peaks
S-11 Initial registration of new securities for REITs	<input type="checkbox"/>	Edit	✕ Amendments No filters	~5/week at peaks
10-12B Initial registration of securities for a spinoff	<input type="checkbox"/>	Edit	✕ Amendments No filters	~10/week at peaks
10-12G Initial registration of new class of securities	<input type="checkbox"/>	Edit	✕ Amendments No filters	~10/week at peaks
F-1 Initial registration of new securities for foreign issuers	<input type="checkbox"/>	Edit	✕ Amendments No filters	~10/week at peaks
F-10 Initial registration of new securities for Canadian	<input type="checkbox"/>	Edit	✕ Amendments No filters	~5/week at peaks

Bamsec All Company Search Alerts available at <https://help.bamsec.com/docs/all-company-filings-alerts>

165. The fifth element of claim 1 requires at least one processor that is configured to:

cause to render at least a portion of the new document from the report on the user interface,

wherein the rendered portion of the new document includes the new identified snippet of text, and wherein at least a portion of the new identified snippet of text is highlighted in the rendered portion of the new document.

166. On information and belief, the Bamsec Platform includes at least one processor that is configured to cause to render at least a portion of the new document from the report on the user interface, wherein the rendered portion of the new document includes the new identified snippet of text, and wherein at least a portion of the new identified snippet of text is highlighted in the rendered portion of the new document. For example, on information and belief, the Bamsec Platform is configured and operable to cause to render at least a portion of the new document on the user interface which includes the new snippet highlighted in the rendered portion of the document (e.g, the right pane in the Bamsec search interface).

167. As a direct and proximate consequence of Tegus's and Bamsec's infringements of AlphaSense's '006 Patent, AlphaSense has suffered damages in an amount not yet determined for which AlphaSense is entitled to relief. AlphaSense also seeks injunctive relief to prevent its ongoing harm stemming from these infringements.

PRAYER FOR RELIEF

WHEREFORE, AlphaSense prays for judgment in its favor and against Defendants as follows:

- A. Entry of judgment that the Defendants infringed and infringe one or more claims of the Patents-in-Suit;
- B. Entry of an order that enjoins Tegus and its representatives, assigns or successors, including any subsidiaries, parents, divisions, agents, servants, or employees thereof, and/or those in privity with Defendants from infringing the claims of the Patents-in-Suit and requires removal of AlphaSense's patented innovations from the accused Tegus and Bamsec products;
- C. To the extent calculable, an award of damages adequate to compensate AlphaSense for infringement (past and continuing) of the Patents-in-Suit by Defendants, in an amount to be proven at trial, but in no event less than a reasonable royalty and/or lost profits, including supplemental damages post-verdict, together with pre-judgment and post-judgment interest and costs, until such time as Defendants cease their infringing conduct;
- D. A determination that, this case is exceptional and awarding AlphaSense its costs of this action, as well as reasonable attorneys' fees as provided by 35 U.S.C. § 285;
- E. An accounting for acts of infringement;
- F. A judgment and order requiring Defendants to pay AlphaSense compulsory ongoing licensing fees, to the extent determinable by the Court in equity; and
- G. All other relief, in law or equity, to which AlphaSense is entitled and/or the Court deems just and proper.

Dated: September 21, 2023

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Adam W. Poff

Adam W. Poff (No. 3990)
Robert M. Vrana (No. 5666)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
apoff@ycst.com
rvrana@ycst.com

McKool Smith, P.C.

John B. Campbell
jcampbell@McKoolSmith.com
Geoffrey L. Smith
gsmith@McKoolSmith.com
303 Colorado St., Suite 2100
Austin, TX 78701
Telephone: (512) 692-8700
Facsimile: (512) 692-8744

Alan P. Block
ablock@mckoolsmith.com
300 S. Grand Avenue, Suite 2900
Los Angeles, California 90071
Telephone (213) 694-1200
Facsimile (213) 694-1234

**ATTORNEYS FOR PLAINTIFFS
ALPHASENSE OY AND
ALPHASENSE, INC.**