

1 Randall T. Garteiser (CA State Bar No. 231821)
rgarteiser@ghiplaw.com
2 Christopher A. Honea (CA State Bar No. 232473)
chonea@ghiplaw.com
3 GARTEISER HONEA—IP TRIAL BOUTIQUE
4 795 Folsom St., Floor 1, San Francisco, CA 94107
5 119 W Ferguson, Tyler, TX 75702
6 Telephone: (888) 908-4400

7 *Attorneys for Plaintiff*

8
9 **IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10
11 **DISPLAY TECHNOLOGIES, LLC**

12 Plaintiff,

13
14 v.

15 **DISCORD INC.,**

16 Defendants.

Case No. 3:24-cv-703

Jury Trial Demanded

17
18 **COMPLAINT FOR PATENT INFRINGEMENT**

19 Plaintiff files this complaint for patent infringement against defendant and alleges as follows:

20 **PARTIES**

21 1. Plaintiff is a Texas limited liability company with an office at 1 East Broward
22 Boulevard, Suite 700, Ft. Lauderdale, FL 33301.

23 2. On information and belief, Defendant Discord Inc. is headquartered at 444 De Haro
24 St., San Francisco, CA 94107.

25 3. Venue is proper in the Northern District of California as to Defendant pursuant to at
26 least 28 U.S.C. §§ 1391 and 1400.

PATENT FAMILY

1
2 4. Display Technologies is the owner of U.S. Patent Numbers 9,300,723 (**Exhibit A**) and
3 8,671,195 (**Exhibit C**).

4 5. The '723 Patent claims priority to a Continuation-in-Part of U.S. application Serial No.
5 11/999,570, filed on Dec. 7, 2007, which is incorporated by reference in its entirety to the '723 patent
6 specification.

7 6. According to Google Patents, the '723 Patent has an anticipated expiration date of no
8 earlier than January 8, 2029. See website page, as last visited on January 24, 2029, at
9 <https://patents.google.com/patent/US9300723B2/en?q=9%2c300%2c723>.

10 7. The examiner performed a thorough examination that included searching in eleven
11 categories, including these:

- 12 a. “**H04W4/80** Services using short range communication, e.g. near-field
13 communication [NFC], radio-frequency identification [RFID] or low energy
14 communication.”
 - 15 b. “**H04W12/086** Access security using security domains”
 - 16 c. “**H04W12/08** Access security,”
 - 17 d. “**H04M1/72412** User interfaces specially adapted for cordless or mobile
18 telephones with means for local support of applications that increase the
19 functionality by interfacing with external accessories using two-way short-range
20 wireless interfaces,”
 - 21 e. “**H04M1/724098** Interfacing with an on-board device of a vehicle,”
 - 22 f. “**H04L67/06** Protocols specially adapted for file transfer, e.g. file transfer protocol
23 [FTP],”
 - 24 g. “**H04L65/75** Media network packet handling,”
 - 25 h. “**H04L63/20** Network architectures or network communication protocols for
26 network security for managing network security; network security policies in
27 general,”
- 28

- 1 i. “**H04L63/10** Network architectures or network communication protocols for
2 network security for controlling access to devices or network resources,”
3 j. “**H04L63/0209** Architectural arrangements, e.g. perimeter networks or
4 demilitarized zones,”
5 k. “**H04B1/3822** Transceivers, i.e. devices in which transmitter and receiver form a
6 structural unit and in which at least one part is used for functions of transmitting
7 and receiving specially adapted for use in vehicles.”

8 8. The ’723 Patent is cited by large electronic suppliers, including Sony Mobile
9 Communications, Inc. in its publication [US20160337303A1](#), titled “Method and system for approving
10 or disapproving connection requests.”¹

11
12 **COUNT I**
(INFRINGEMENT OF UNITED STATES PATENT NO. 9,300,723)

13 9. Plaintiff incorporates above paragraphs herein by reference.

14 10. The ’723 Patent does not expire under January 8, 2029.

15 11. This cause of action arises under the patent laws of the United States, Title 35 U.S.C.
16 §§ 271, *et seq.*

17 12. Plaintiff is the owner by assignment of the ’723 Patent with sole rights to enforce the
18 ’723 Patent and sue infringers.

19 13. A copy of the ’723 Patent, titled “Enabling social interactive wireless
20 communications,” is attached hereto as **Exhibit A**.

21 14. The ’723 Patent is valid, enforceable, and was duly issued in full compliance with
22 Title 35 of the United States Code.

23 15. Defendant has infringed and continues to infringe **Claims 22, 24, 27, 29 and 30 of**
24 **the ’723 Patent** by making, using, and/or selling its Accused Instrumentality. *See Exhibit B.*
25

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28 ¹ Sony is an investor in Discord.

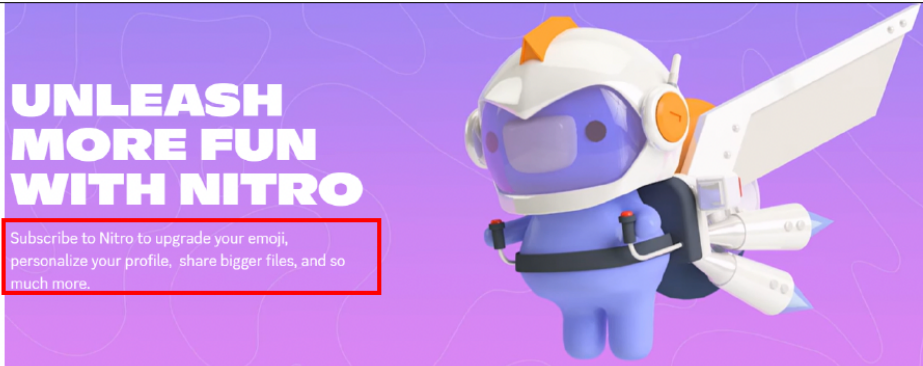
1 16. Defendant’s actions complained of herein will continue unless Defendant is enjoined
 2 by this court.

3 17. Defendant’s actions complained of herein are causing irreparable harm and monetary
 4 damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained
 5 by this Court.
 6

Claim	Analysis
<p>[22.P] A method of transferring a media file from a wireless mobile device to a media system over a communication network, the media system including a security measure, comprising:</p>	<p>Discord (“Company”) performs and/or induces others to perform a method of transferring a media file from a wireless mobile device to a media system over a communication network, the media system including a security measure.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Company provides a Discord app which is installed on both the user’s mobile device (“media system”) and his friend’s mobile device (“wireless mobile device”). It features a functionality called Server which serves as a place where users and their friends can exchange text chat (“transferring a media file”) within a voice channel, facilitated by a wireless network connection (“a communication network”). Within this voice channel, users can communicate with each other through text-based messages. To communicate through text chat in voice channels, both the user and his friend need to log in (“security measure”) to the Discord account.</p>  <p>Source: https://discord.com/</p>

19
 20 **Figure 1** – Excerpt from Page 2 of Exhibit 2.

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UNLEASH MORE FUN WITH NITRO

Subscribe to Nitro to upgrade your emoji, personalize your profile, share bigger files, and so much more.

Source: <https://discord.com/nitro>

What Is A Server?

Discord gives you the power to create an **invite-only** home for your friends or community - a place where you can talk, hang out, and have fun. We call these special places - **servers**, and they look like this:

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

- You can join or create servers for all kinds of communities -- be it a book club 📖, a dance class 💃, a study group 📚, or just some friends you want to spend time with.

How To Use Text And Voice Channels

Your server is made up of **text channels** and **voice channels**.

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Figure 2 – Excerpt from Page 3 of Exhibit 2.

Voice channels are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk, wave hello over video, or share their screen.

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

Where Can I Find The Text Chat In A Voice Channel?

Every voice channel has an associated text chat that users can utilize if their role or the channel has the appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand corner of the voice UI (and a swipe-left gesture for mobile!).

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 3 – Excerpt from Page 4 of Exhibit 2.

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Mobile clients

You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 4 – Excerpt from Page 5 of Exhibit 2.

Sending Photos And Files

Want to stay in chat and directly send a photo without opening your camera app?

1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
2. This will let you view your photos within your photo gallery or select the Camera button.
3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within Discord. Then, you will be able to take a photo.
4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

Figure 5 – Excerpt from Page 6 of Exhibit 2.



11 Figure 6 – Excerpt from Page 7 of Exhibit 2.

12 Here are the steps we recommend to resolve the above errors:

13 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it

14 back on again" trick works.

15 2. Check with your internet service provider and make sure there are no outages in your area.

16 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled

17 4. Check your VPN (Discord only works on VPNs that have UDP)

18 5. Check with your network admin - If you're on a work/school network, Discord could be blocked!

19 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in

20 Voice Channel Settings > Overview > Region Override.

21 - You're also able to change a voice region in private voice calls

22 Source: <https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors>

23 **Adding A Friend In A Server**

24 1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap

25 on that person's username in the server list or press on the user's avatar in chat to open their **User**

26 **Profile**.

27 2. Once you've opened their profile, you'll be able to select the **Add Friend** option to send a Friend

28 Request.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

26 Figure 7 – Excerpt from Page 8 of Exhibit 2.

1 2 3 4 5 6 7	<p>Logging Into Your Account</p> <p>If you're on a browser, start by heading to https://discord.com/login!</p> <p>If you're on a desktop or mobile device, you can directly open the Discord app on your device! (You can learn more information on downloading the app here.)</p> <p>Once you're at the login page, type in either 1) your email address or 2) phone number that has been officially verified to your Discord account in the first text box.</p> <p>Note: You will need to verify your phone number to your Discord account before using phone number login! Click here to learn how to verify your phone number to your Discord account.</p> <p>In the second box, type the password associated with your account!</p> <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p>
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Figure 8 – Excerpt from Page 9 of Exhibit 2.

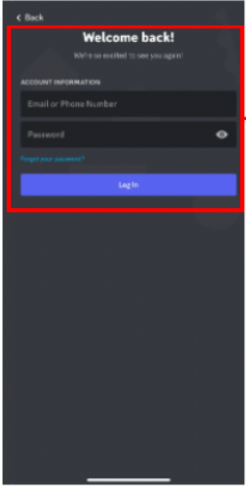
9 10 11 12 13 14 15 16 17 18 19 20 21 22	 <p>Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p>
	<p>Further, to the extent this element is performed at least in part by Defendant’s software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[22.1] disposing the media system in an accessible relation to at least one interactive computer network that has a wireless</p>	<p>Company performs and/or induces others to perform the step of disposing the media system in an accessible relation to at least one interactive computer network that has a wireless range structured to permit authorized access to said at least one interactive computer network, wherein the wireless mobile device within said wireless range, wherein said wireless mobile device is detectable by said media system.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Discord app is installed on the user's mobile device (“media system”). Users engage in communication with their friends through a Text Chat feature of the voice channel. When a user utilizes Text Chat, their text chats are transmitted from his mobile device to the friend’s mobile device via a wireless internet connection (“interactive</p>

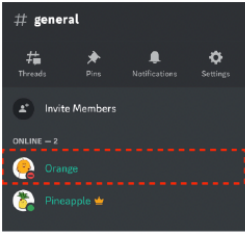
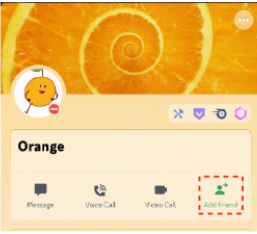
Figure 9 – Excerpt from Page 10 of Exhibit 2.

<p>1 range structured to permit authorized access to said at least one interactive computer network, wherein the wireless mobile device within said wireless range, wherein said wireless mobile device is detectable by said media system,</p>	<p>computer network”). Given that the user needs to connect to the wireless internet connection to engage in text chat communication, it is apparent that the user’s mobile device maintains an accessible relationship with the interactive computer network.</p> <p>Further, the user’s mobile device logs in to the router by entering its login credentials (“authorized access”) on its mobile device for establishing a wireless connection to the wireless internet (“interactive computer network”). As wireless routers inherently possess a specified range, therefore, it is apparent to a person having ordinary skill in the art that a wireless range is structured to permit authorized access to at least one interactive computer network.</p> <p>Furthermore, the user adds his friends to the server so that he can communicate with them through text chat. Subsequently, in text chat, the friend’s mobile device (“wireless mobile device”) transmits text chats to the user’s mobile device (“media system”) through the established wireless connection. Given that wireless routers have a defined range and the user’s mobile device connects to it before initiating an internet connection, it follows that the user’s mobile device communicates with its friend’s mobile device. Therefore, upon information and belief, the friend’s mobile device is disposed within said wireless range and it is detectable by the user’s mobile device.</p>
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Figure 10 – Excerpt from Page 11 of Exhibit 2.

Adding A Friend In A Server

1. If you’re already in a server, and you’d like to add someone you’ve become friends with, you can also tap on that person’s username in the server list or press on the user’s avatar in chat to open their **User Profile**.
2. Once you’ve opened their profile, you’ll be able to select the **Add Friend** option to send a Friend Request.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

What Is A Server?

Discord gives you the power to create an **invite-only** home for your friends or community - a place where you can talk, hang out, and have fun. We call these special places - **servers**, and they look like this:

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Figure 11 – Excerpt from Page 12 of Exhibit 2.

1 • You can join or create servers for all kinds of communities -- be it a book club 📖, a dance class 🕺
2 , a study group 📚, or just some friends you want to spend time with.

3 **How To Use Text And Voice Channels**

4 Your server is made up of text channels and voice channels.
Source: <https://support.discord.com/hc/en-us/articles/360045138571>

5 **Voice channels** are where you can hang out over voice and video. There's no calling or ringing required -
6 just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk,
7 wave hello over video, or share their screen.
Source: <https://support.discord.com/hc/en-us/articles/360045138571>

8 Using the embedded text chat of voice channels, users can send message content, comment on
9 something being said without interrupting the speaker, and share links, memes, and more, all in the
10 dedicated text chat within the voice channel. This feature also means users don't have to switch to a
11 different text channel while in a voice channel, missing the stream you're actively watching or potentially
12 distracting you from the live conversation happening in the voice channel.
Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

11 Figure 12 – Excerpt from Page 13 of Exhibit 2.

12 **Mobile clients**

13 You can find the text chat in a voice channel on your iOS or Android device by going through the steps
14 below:

15 1. Go to the server with the voice channel you want to join and press on the voice channel's name.
16 2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a
17 message bubble icon in the upper right-hand corner of the voice UI.
18 3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can
19 also join voice and see the text chat simultaneously.

20 For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring
the text chat into view.
Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

20 Figure 13 – Excerpt from Page 14 of Exhibit 2.

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Figure 14 – Excerpt from Page 15 of Exhibit 2.

	<p>Here are the steps we recommend to resolve the above errors:</p> <ol style="list-style-type: none"> 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works. 2. Check with your internet service provider and make sure there are no outages in your area. 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled 4. Check your VPN (Discord only works on VPNs that have UDP) 5. Check with your network admin - If you're on a work/school network, Discord could be blocked! 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override. - You're also able to change a voice region in private voice calls <p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[22.2] initially disposing at least one digital media file on the wireless mobile device, said media system being structured to detect said wireless mobile device disposed within said wireless range.</p>	<p>Company performs and/or induces others to perform the step of initially disposing at least one digital media file on the wireless mobile device, said media system being structured to detect said wireless mobile device disposed within said wireless range.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, both user's mobile device and his friend's mobile device communicate with each other using text chat in the voice channel. The friend's mobile device ("wireless mobile device") sends the text chat ("initially disposing at least one digital media file") to the user's mobile device. Therefore, it would be apparent to a person having ordinary skill in the art that the user's mobile device ("media system") is structured to detect its friend's mobile device ("wireless mobile device"). Since, both the user and his friend's mobile devices are connected to a wireless router having a defined range therefore, upon information and belief, the friend's mobile device is disposed within said wireless range.</p>

Figure 15 – Excerpt from Page 16 of Exhibit 2.

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Voice channels are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk, wave hello over video, or share their screen.

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Mobile clients

You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

digital media file

Friend's mobile device ("wireless mobile device")

Figure 16 – Excerpt from Page 17 of Exhibit 2.

Sending Photos And Files

Want to stay in chat and directly send a photo without opening your camera app?

1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
2. This will let you view your photos within your photo gallery or select the Camera button.
3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within Discord. Then, you will be able to take a photo.
4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

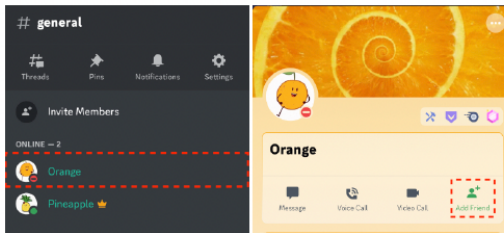
Figure 17 – Excerpt from Page 18 of Exhibit 2.

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Adding A Friend In A Server

1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their **User Profile**.
2. Once you've opened their profile, you'll be able to select the **Add Friend** option to send a Friend Request.

Friend's mobile device ("wireless mobile device")



Source: <https://support.discord.com/hc/en-us/articles/360046618751> (annotated)

Here are the steps we recommend to resolve the above errors:

1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works.
2. Check with your internet service provider and make sure there are no outages in your area.
3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled
4. Check your VPN (Discord only works on VPNs that have UDP)
5. Check with your network admin - If you're on a work/school network, Discord could be blocked!
6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override.
- You're also able to change a voice region in private voice calls

Figure 18 – Excerpt from Page 19 of Exhibit 2.

1	<p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <p>Further, to the extent this element is performed at least in part by Defendant’s software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>2</p> <p>3 [22.3] structuring a communication link to dispose said media system and said wireless mobile device in a communicative relation with one another via said at least one interactive computer network.</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p>	<p>Company performs and/or induces others to perform the step of structuring a communication link to dispose said media system and said wireless mobile device in a communicative relation with one another via said at least one interactive computer network.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, once connected to the wireless internet, the user initiates the login process to their Discord account using his mobile device (“media system”). This involves entering login credentials such as email and password through the wireless connection (“one interactive computer network”). Further, the user adds his friend so that he can communicate with them through text chat in the voice channel. Consequently, this procedure establishes a communication channel (“structuring a communication link”) between the user’s mobile device and the friend’s mobile device (“wireless mobile device”).</p> <p>Logging Into Your Account</p> <p>If you’re on a browser, start by heading to https://discord.com/login!</p> <p>If you’re on a desktop or mobile device, you can directly open the Discord app on your device! (You can learn more information on downloading the app here.)</p> <p>Once you’re at the login page, type in either 1) your email address or 2) phone number that has been officially verified to your Discord account in the first text box.</p> <p>Note: You will need to verify your phone number to your Discord account before using phone number login! Click here to learn how to verify your phone number to your Discord account.</p> <p>In the second box, type the password associated with your account!</p> <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p>

Figure 19 – Excerpt from Page 20 of Exhibit 2.

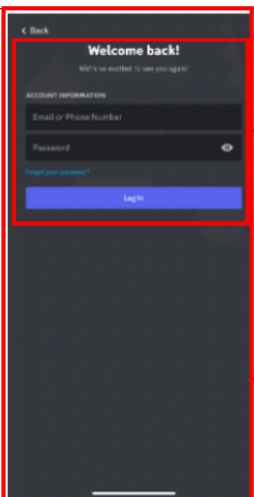
<p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p>	 <p>Log In to Discord account</p> <p>media system</p> <p>Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p> <p>What Is A Server?</p> <p>Discord gives you the power to create an invite-only home for your friends or community - a place where you can talk, hang out, and have fun. We call these special places - servers, and they look like this:</p> <p>Source: https://support.discord.com/hc/en-us/articles/360045138571</p>
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Figure 20 – Excerpt from Page 21 of Exhibit 2.

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- You can join or create servers for all kinds of communities -- be it a book club 📖, a dance class 💃, a study group 🎨, or just some friends you want to spend time with.

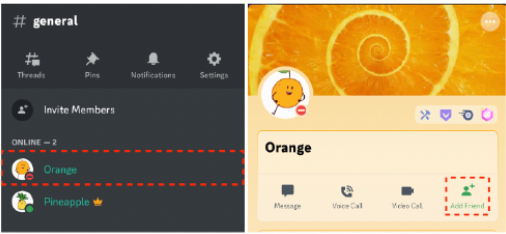
How To Use Text And Voice Channels

Your server is made up of **text channels** and **voice channels**.

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Adding A Friend In A Server

1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their **User Profile**.
2. Once you've opened their profile, you'll be able to select the **Add Friend** option to send a Friend Request.



Source: <https://support.discord.com/hc/en-us/articles/360046618751> (annotated)

user's mobile device ("media system") adds friend

Figure 21 – Excerpt from Page 22 of Exhibit 2.



interactive computer network

media system

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

Figure 22 – Excerpt from Page 23 of Exhibit 2.

<p>1 2 3 4 5 6 7</p>	<p>Here are the steps we recommend to resolve the above errors:</p> <ol style="list-style-type: none"> 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works. 2. Check with your internet service provider and make sure there are no outages in your area. 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled 4. Check your VPN (Discord only works on VPNs that have UDP) 5. Check with your network admin - If you're on a work/school network, Discord could be blocked! 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override. <ul style="list-style-type: none"> - You're also able to change a voice region in private voice calls <p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>8 9 10 11</p>	<p>[22.4] initiating said communication link by said media system.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user adds his friends so that he can communicate with them through text chat in the voice channel. Consequently, this procedure establishes a communication channel between the user's mobile device and the friend's mobile device ("initiating said communication link by said media system").</p>

Figure 23 – Excerpt from Page 24 of Exhibit 2.

Logging Into Your Account

If you're on a browser, start by heading to <https://discord.com/login!>

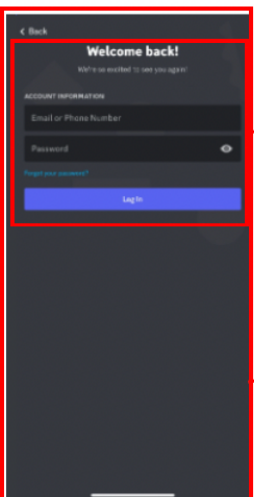
If you're on a desktop or mobile device, you can directly open the Discord app on your device! (You can learn more information on downloading the app [here](#).)

Once you're at the login page, type in either 1) your email address or 2) phone number that has been officially verified to your Discord account in the first text box.

Note: You will need to verify your phone number to your Discord account before using phone number login! [Click here to learn how to verify your phone number to your Discord account.](#)

In the second box, type the password associated with your account!

Source: <https://support.discord.com/hc/en-us/articles/360046618751>



Log In to Discord account

media system

Figure 24 – Excerpt from Page 25 of Exhibit 2.

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	<p>Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p> <h3>What Is A Server?</h3> <p>Discord gives you the power to <u>create an invite-only home for your friends</u> or community - a place where you can talk, hang out, and have fun. We call these special places - servers, and they look like this:</p> <p>Source: https://support.discord.com/hc/en-us/articles/360045138571</p> <ul style="list-style-type: none"> • <u>You can join or create servers for all kinds of communities</u> -- be it a book club 📖, a dance class 💃, a study group 📚, or <u>just some friends you want to spend time with.</u> <h3>How To Use Text And Voice Channels</h3> <p>Your server is made up of text channels and voice channels.</p> <p>Source: https://support.discord.com/hc/en-us/articles/360045138571</p>
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Figure 25 – Excerpt from Page 26 of Exhibit 2.

	<h3>Adding A Friend In A Server</h3> <ol style="list-style-type: none"> 1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their User Profile. 2. Once you've opened their profile, <u>you'll be able to select the Add Friend option to send a Friend Request.</u>  <p>Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[22.5] transmitting by said wireless mobile device to the media system said at least one digital media file therebetween</p>	<p>Company performs and/or induces others to perform the step of transmitting by said wireless mobile device to the media system said at least one digital media file therebetween via said communication link.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, both the user and his friend communicate with each other using text chat in voice channel. The friend's mobile device ("wireless mobile device") sends the text chat ("digital media file") to the user's mobile device ("media system").</p>

Figure 26 – Excerpt from Page 27 of Exhibit 2.

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2 communication
3 link, and



4 wireless mobile
5 device

6 digital media file

7 media
8 system

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10 Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

11 Voice channels are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk, wave hello over video, or share their screen.

12 Source: <https://support.discord.com/hc/en-us/articles/360045138571> (annotated)

13 Figure 27 – Excerpt from Page 28 of Exhibit 2.

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15 Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a

16 different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

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18 **Where Can I Find The Text Chat In A Voice Channel?**

19 Every voice channel has an associated text chat that users can utilize if their role or the channel has the appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand corner of the voice UI (and a swipe-left gesture for mobile!).

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21 Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

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digital media file

22 Figure 28 – Excerpt from Page 29 of Exhibit 2.

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Mobile clients

You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 29 – Excerpt from Page 30 of Exhibit 2.

Sending Photos And Files

Want to stay in chat and directly send a photo without opening your camera app?

1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
2. This will let you view your photos within your photo gallery or select the Camera button.
3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within Discord. Then, you will be able to take a photo.
4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

Figure 30 – Excerpt from Page 31 of Exhibit 2.

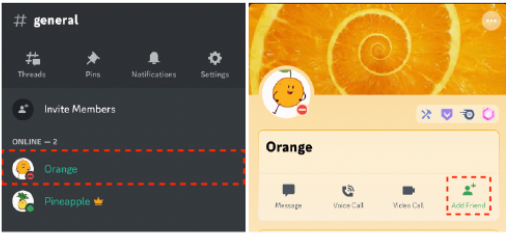
<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p>	<p>Adding A Friend In A Server</p> <p>1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their User Profile.</p> <p>2. Once you've opened their profile, you'll be able to select the Add Friend option to send a Friend Request.</p>  <p>Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p>	<p>[22.6] wherein said communication link is structured to bypass the security measure of the media system for a limited</p> <p>Company performs and/or induces others to perform the step of wherein said communication link is structured to bypass the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file to, and displaying the at least one digital media file on, the media system.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user's mobile device ("media system") and the friend's mobile device initially requires to enter login credentials such as an email and a password ("security measure") for login into Discord server. The server does not require both user and his friend to input the email and password ("security measure") every time they communicate. Instead, the email and password input are necessary during the initial connection process, and thereafter, both user and</p>

Figure 31 – Excerpt from Page 32 of Exhibit 2.

<p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>his friend's mobile device automatically exchanges data without requiring users to re-enter the email and password ("bypass the security measure of the media system"). Therefore, upon information and belief, the communication link is structured to bypass the security measure of the media system. Furthermore, the friend's mobile device utilizes the communication channel exclusively for transmitting the text chats ("digital media file") to the user's mobile device ("bypass the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file"). The user's mobile device displays the received text chats.</p> <p>Logging Into Your Account</p> <p>If you're on a browser, start by heading to https://discord.com/login!</p> <p>If you're on a desktop or mobile device, you can directly open the Discord app on your device! (You can learn more information on downloading the app here.)</p> <p>Once you're at the login page, type in either 1) your email address or 2) phone number that has been officially verified to your Discord account in the first text box.</p> <p>Note: You will need to verify your phone number to your Discord account before using phone number login! Click here to learn how to verify your phone number to your Discord account.</p> <p>In the second box, type the password associated with your account!</p> <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p>
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Figure 32 – Excerpt from Page 33 of Exhibit 2.

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Figure 33 – Excerpt from Page 34 of Exhibit 2.



Figure 34 – Excerpt from Page 35 of Exhibit 2.

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Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

Where Can I Find The Text Chat In A Voice Channel?

Every voice channel has an associated text chat that users can utilize if their role or the channel has the appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand corner of the voice UI (and a swipe-left gesture for mobile!).

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

digital media file

Figure 35 – Excerpt from Page 36 of Exhibit 2.

Mobile clients

You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 36 – Excerpt from Page 37 of Exhibit 2.

Sending Photos And Files

Want to stay in chat and directly send a photo without opening your camera app?

1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
2. This will let you view your photos within your photo gallery or select the Camera button.
3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within Discord. Then, you will be able to take a photo.
4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

Figure 37 – Excerpt from Page 38 of Exhibit 2.

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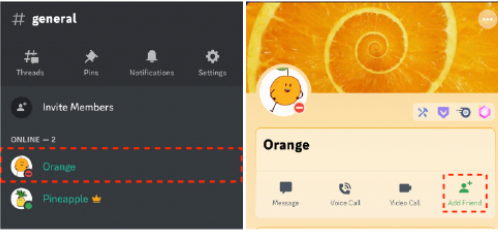
	<p>Adding A Friend In A Server</p> <p>1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their User Profile.</p> <p>2. Once you've opened their profile, you'll be able to select the Add Friend option to send a Friend Request.</p>  <p>Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[24] The method of claim 22, wherein the transmission of the at least one digital media file from the wireless mobile</p>	<p>Company performs and/or induces others to perform the step of transmission of the at least one digital media file from the wireless mobile device to the media system completely bypasses the security measure.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user's mobile device ("media system") and the friend's mobile device ("wireless mobile device") are not required to input the email and password ("security measure") every time they communicate. Instead, the email and password input are necessary during the initial connection process, and thereafter, the devices automatically exchange data without requiring users to re-enter the email and password. The friend's mobile device transmits the text chats in voice channel to the user's mobile device ("bypass the security measure"). Therefore, upon information and belief, the channel created between the user's mobile device and the friend's mobile device bypass the security measure.</p>

Figure 38 – Excerpt from Page 39 of Exhibit 2.

<p>device to the media system completely bypasses the security measure.</p>	<p>Logging Into Your Account</p> <p>If you're on a browser, start by heading to https://discord.com/login!</p> <p>If you're on a desktop or mobile device, you can directly open the Discord app on your device! (You can learn more information on downloading the app here.)</p> <p>Once you're at the login page, type in either 1) your email address or 2) phone number that has been officially verified to your Discord account in the first text box.</p> <p>Note: You will need to verify your phone number to your Discord account before using phone number login! Click here to learn how to verify your phone number to your Discord account.</p> <p>In the second box, type the password associated with your account!</p> <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p>
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Figure 39 – Excerpt from Page 40 of Exhibit 2.

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Figure 40 – Excerpt from Page 41 of Exhibit 2.



Figure 41 – Excerpt from Page 42 of Exhibit 2.

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Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

Where Can I Find The Text Chat In A Voice Channel?

Every voice channel has an associated text chat that users can utilize if their role or the channel has the appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand corner of the voice UI (and a swipe-left gesture for mobile!).

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

digital media file

Figure 42 – Excerpt from Page 43 of Exhibit 2.

Mobile clients

You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 43 – Excerpt from Page 44 of Exhibit 2.

Sending Photos And Files

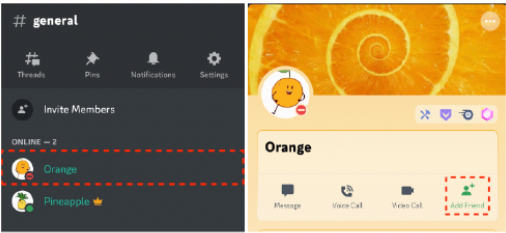
Want to stay in chat and directly send a photo without opening your camera app?

1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
2. This will let you view your photos within your photo gallery or select the Camera button.
3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within Discord. Then, you will be able to take a photo.
4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

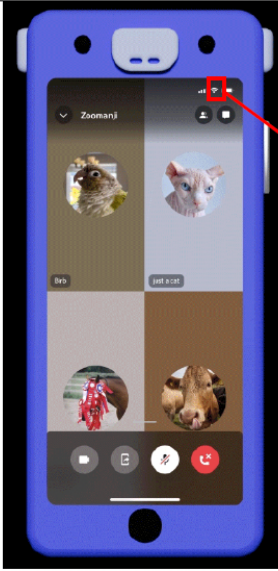
Figure 44 – Excerpt from Page 45 of Exhibit 2.

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	<p>Adding A Friend In A Server</p> <p>1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their User Profile.</p> <p>2. Once you've opened their profile, you'll be able to select the Add Friend option to send a Friend Request.</p>  <p>Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[27] The method of claim 22, wherein the communication link is at least one of a peer-to-peer connection, bluetooth connection,</p>	<p>Company performs and/or induces others to perform the step of the communication link is at least one of a peer-to-peer connection, bluetooth connection, and a WiFi connection.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the friend's mobile device transmits the text chats to the user's mobile device using the wireless internet connection ("WiFi connection").</p>

wireless mobile device

Figure 45 – Excerpt from Page 46 of Exhibit 2.

<p>and a WiFi connection.</p>	 <p>Source: https://support.discord.com/hc/en-us/articles/4412085582359 (annotated)</p>
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WiFi connection

Figure 46 – Excerpt from Page 47 of Exhibit 2.

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Figure 47 – Excerpt from Page 48 of Exhibit 2.

	<p>Here are the steps we recommend to resolve the above errors:</p> <ol style="list-style-type: none"> 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works. 2. Check with your internet service provider and make sure there are no outages in your area. 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled 4. Check your VPN (Discord only works on VPNs that have UDP) 5. Check with your network admin - If you're on a work/school network, Discord could be blocked! 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override. <ul style="list-style-type: none"> - You're also able to change a voice region in private voice calls <p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[29] The method of claim 22, further comprising presenting the at least one digital media file on a display.</p>	<p>Company performs and/or induces others to perform the step of presenting the at least one digital media file on a display.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user's mobile device show ("presenting") the received text chats ("digital media file") on its display.</p>

Figure 48 – Excerpt from Page 49 of Exhibit 2.

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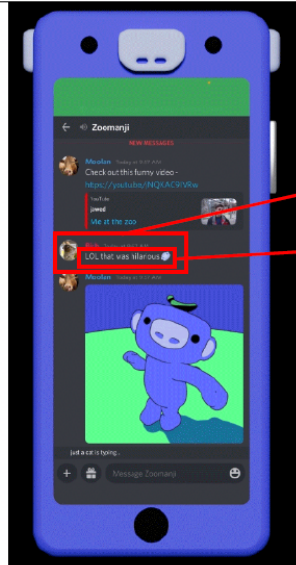


Figure 49 – Excerpt from Page 50 of Exhibit 2.

	<p>Mobile clients</p> <p>You can find the <u>text chat in a voice channel on your iOS or Android device</u> by going through the steps below:</p> <ol style="list-style-type: none"> 1. Go to the server with the voice channel you want to join and press on the voice channel's name. 2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI. 3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously. <p>For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.</p> <p>Source: https://support.discord.com/hc/en-us/articles/4412085582359</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[30] The method of claim 22, wherein the at least one digital media file is provided by the wireless mobile device.</p>	<p>Company performs and/or induces others to perform the step of at least one digital media file is provided by the wireless mobile device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the friend's mobile device ("wireless mobile device") transmits ("provided") the text chats ("at least one digital media file") to the user's mobile device.</p>

Figure 50 – Excerpt from Page 51 of Exhibit 2.

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wireless mobile device
digital media file

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

Voice channels are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk, wave hello over video, or share their screen.

Source: <https://support.discord.com/hc/en-us/articles/360045138571> (annotated)

Figure 51 – Excerpt from Page 52 of Exhibit 2.

Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

digital media file

Where Can I Find The Text Chat In A Voice Channel?

Every voice channel has an associated text chat that users can utilize if their role or the channel has the appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand corner of the voice UI (and a swipe-left gesture for mobile!).

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

Figure 52 – Excerpt from Page 53 of Exhibit 2.

1 **Mobile clients**

2 You can find the text chat in a voice channel on your iOS or Android device by going through the steps

3 below:

4 1. Go to the server with the voice channel you want to join and press on the voice channel's name.

5 2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a

6 message bubble icon in the upper right-hand corner of the voice UI.

7 3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can

8 also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

9 Figure 53 – Excerpt from Page 54 of Exhibit 2.

10 **Sending Photos And Files**

11 Want to stay in chat and directly send a photo without opening your camera app?

12 1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.

13 2. This will let you view your photos within your photo gallery or select the Camera button.

14 3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within

15 Discord. Then, you will be able to take a photo.

16 4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to

17 your friends.

18 Source: <https://support.discord.com/hc/en-us/articles/360046618751>

Further, to the extent this element is performed at least in part by Defendant’s software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

19 Figure 54 – Excerpt from Page 55 of Exhibit 2.

20 **2. List of References**

21 1. <https://support.discord.com/hc/en-us/articles/360045138571>, last accessed on December 27, 2023.

22 2. <https://support.discord.com/hc/en-us/articles/360057027354>, last accessed on December 27, 2023.

23 3. <https://support.discord.com/hc/en-us/articles/360046618751>, last accessed on December 27, 2023.

24 4. <https://support.discord.com/hc/en-us/articles/115001310031>, last accessed on December 27, 2023.

25 5. <https://support.discord.com/hc/en-us/articles/4412085582359>, last accessed on December 27, 2023.

26 6. <https://discord.com/>, last accessed on December 27, 2023.

27 7. <https://discord.com/nitro>, last accessed on December 27, 2023.

28 Figure 55 – Excerpt from Page 56 of Exhibit 2.

18. Plaintiff is in compliance with 35 U.S.C. § 287.

1 19. Defendant’s infringement is willful as it had knowledge of the patents through its
 2 Freedom to Operate analysis performed on information and belief, through conversations about its
 3 alleged infringement with counsel for Display Technologies, LLC, and via this lawsuit.

4
 5 **COUNT II**
(INFRINGEMENT OF UNITED STATES PATENT NO. 8,671,195)

6 20. Plaintiff refers to and incorporates the allegations in Paragraphs above, the same as
 7 if set forth herein.

8 21. Defendant has infringed and continues to infringe, **claims 1, 6, 7, 9, 17, 18, 19, 21,**
 9 **23 of the ’195 Patent** in violation of 35 U.S.C. § 271. Upon information and belief, Defendant has
 10 infringed and continues to infringe these claims by making, using, importing, selling, and/or offering
 11 for sale (as identified in the Claim Chart attached hereto as **Exhibit D**) the Accused
 12 Instrumentalities.
 13

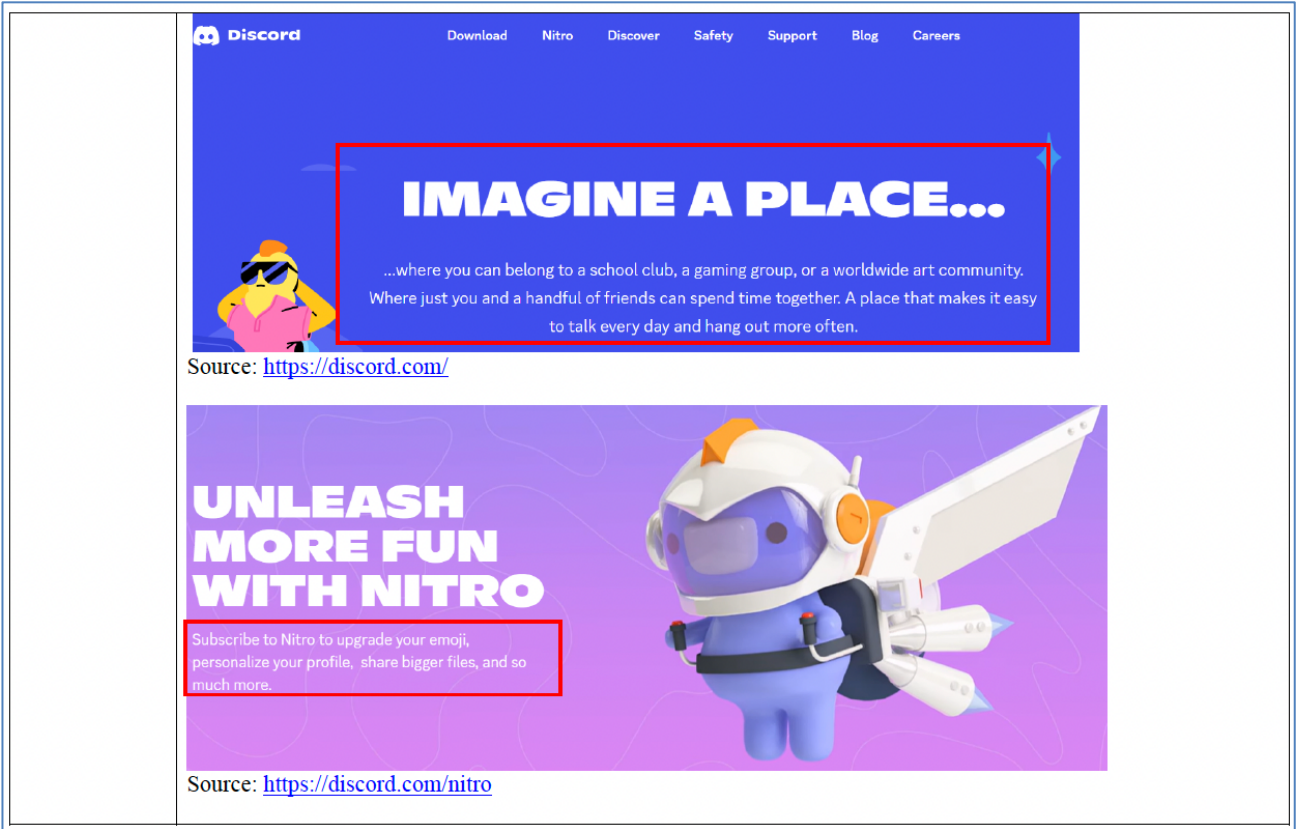
14 22. Defendant also has and continues to directly infringe, literally or under the doctrine
 15 of equivalents, these asserted claims of the ’195 Patent, by having its employees internally test and
 16 use the Accused Instrumentalities.
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18 23. The service of this Complaint, in conjunction with the attached Claim Chart and
 19 references cited, constitutes actual knowledge of infringement as alleged here.

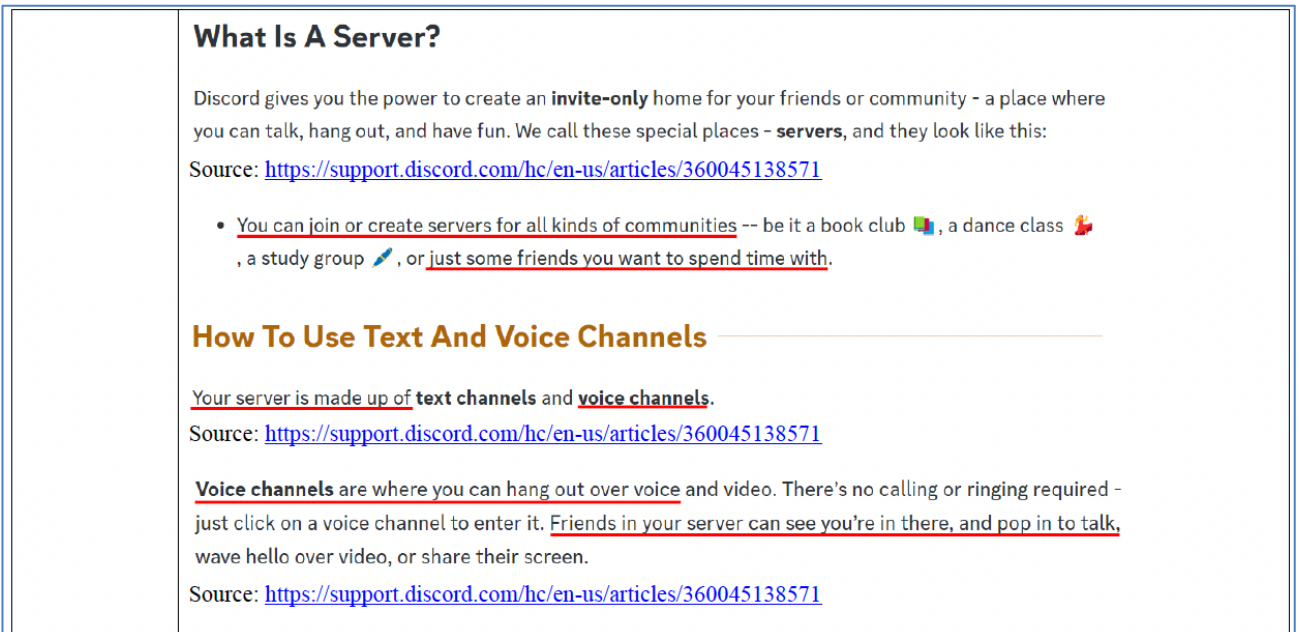
[17.P] A digital media communication protocol, comprising	Discord (“Company”) makes, uses, sells and/or offers to sell a digital media communication protocol. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, the Company provides a Discord app installed on users' devices, featuring a functionality called Server. This serves as a place where users and their friends can exchange text chat within a voice channel, facilitated by a wireless network connection. Within this voice channel, users can communicate with each other through text-based messages. It would be apparent to a person having ordinary skill in the art that the wireless network connection uses a digital media communication protocol to send text chats.
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25 Figure 56 – Excerpt from Page 55 of Exhibit 4.

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14 Figure 57 – Excerpt from Page 56 of Exhibit 4.



25 Figure 58 – Excerpt from Page 57 of Exhibit 4.

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Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

Where Can I Find The Text Chat In A Voice Channel?

Every voice channel has an associated text chat that users can utilize if their role or the channel has the appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand corner of the voice UI (and a swipe-left gesture for mobile!).

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 59 – Excerpt from Page 58 of Exhibit 4.

Mobile clients

You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 60 – Excerpt from Page 59 of Exhibit 4.

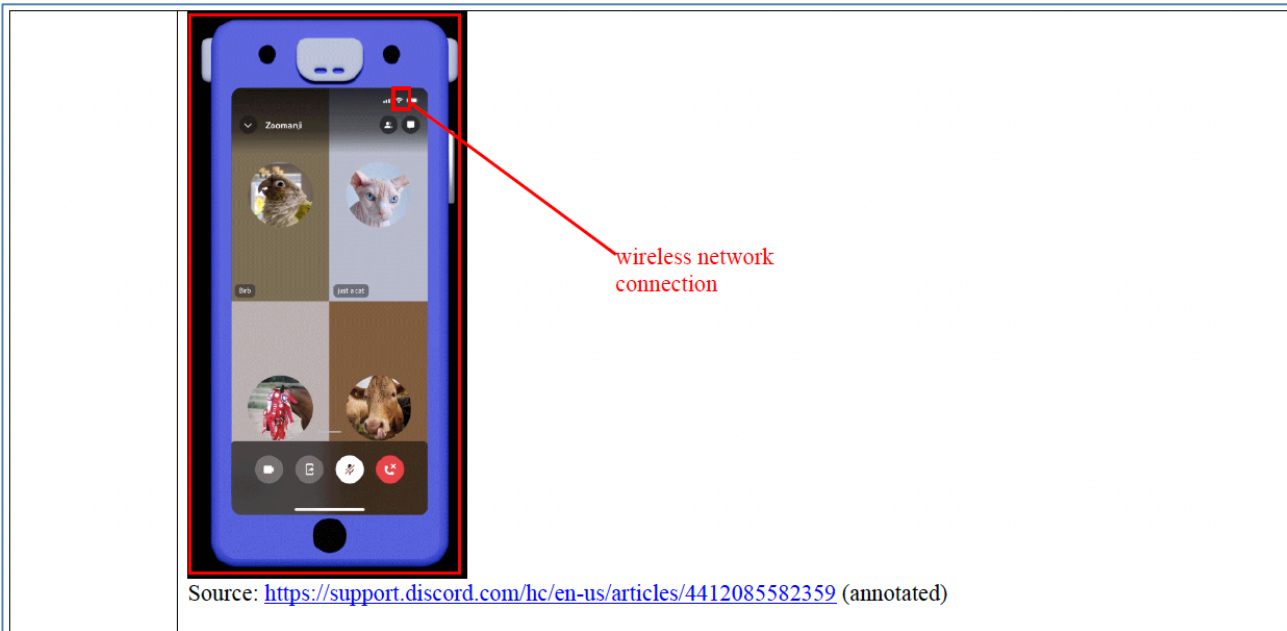
Sending Photos And Files

Want to stay in chat and directly send a photo without opening your camera app?

1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
2. This will let you view your photos within your photo gallery or select the Camera button.
3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within Discord. Then, you will be able to take a photo.
4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

Figure 61 – Excerpt from Page 60 of Exhibit 4.



11 Figure 62 – Excerpt from Page 61 of Exhibit 4.

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	<p>Here are the steps we recommend to resolve the above errors:</p> <ol style="list-style-type: none"> 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works. 2. Check with your internet service provider and make sure there are no outages in your area. 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled 4. Check your VPN (Discord only works on VPNs that have UDP) 5. Check with your network admin - If you're on a work/school network, Discord could be blocked! 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override. <p>- You're also able to change a voice region in private voice calls</p> <p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[17.1] at least one media terminal and at least one media node disposed in an accessible relation with at least one inter active computer network.</p>	<p>Company makes, uses, sells and/or offers to sell at least one media terminal and at least one media node disposed in an accessible relation with at least one inter active computer network.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Discord app is installed on the user's mobile device ("media terminal"). Users engage in communication with their friends through a Text Chat feature of the voice channel. When the user utilizes Text Chat, their text chats are transmitted from his mobile device to the friend's mobile device via a wireless internet connection ("interactive computer network"). Given that the user needs to connect to the wireless internet connection to engage in text chat communication, it is apparent that the user's mobile device and the friend's mobile device disposed in an accessible relation with at least one interactive computer network.</p>

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Figure 63 – Excerpt from Page 62 of Exhibit 4.

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Mobile clients

You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 64 – Excerpt from Page 63 of Exhibit 4.

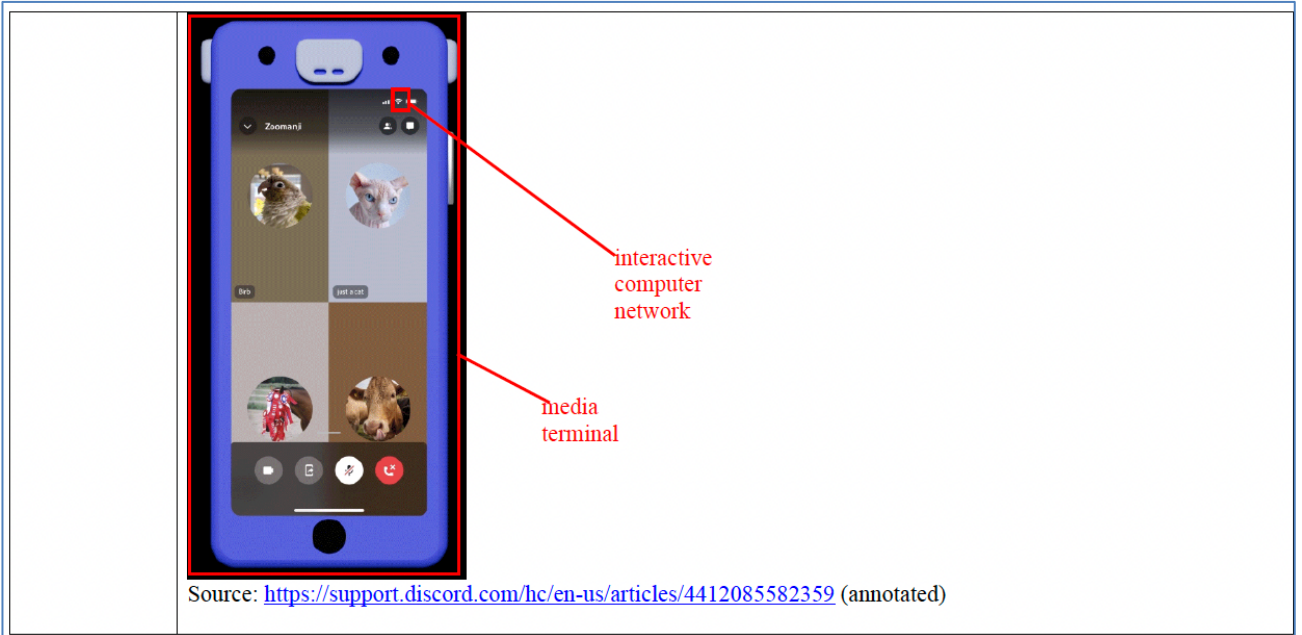


Figure 65 – Excerpt from Page 64 of Exhibit 4.

<p>1 2 3 4 5 6 7</p>	<p>Here are the steps we recommend to resolve the above errors:</p> <ol style="list-style-type: none"> 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works. 2. Check with your internet service provider and make sure there are no outages in your area. 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled 4. Check your VPN (Discord only works on VPNs that have UDP) 5. Check with your network admin - If you're on a work/school network, Discord could be blocked! 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override. <ul style="list-style-type: none"> - You're also able to change a voice region in private voice calls <p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>8 9 10 11 12 13 14</p>	<p>[17.2] at least one digital media file initially disposed on at least one of said media terminal or said media node, said at least one media terminal structured to detect said at least</p> <p>Company makes, uses, sells and/or offers to sell at least one digital media file initially disposed on at least one of said media terminal or said media node, said at least one media terminal structured to detect said at least one media node.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user's mobile device ("media terminal") sends ("initially disposed") the text chats ("digital media file"). Discord app also enables the user to add its friends. Therefore, it would be apparent to a person having ordinary skill in the art that the user's mobile device ("at least one media terminal") is structured to detect its friend's mobile device ("at least one media node").</p> <p><u>Voice channels</u> are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. <u>Friends in your server can see you're in there, and pop in to talk,</u> wave hello over video, or share their screen.</p> <p>Source: https://support.discord.com/hc/en-us/articles/360045138571</p>

Figure 66 – Excerpt from Page 65 of Exhibit 4.

<p>16 17 18 19 20 21 22 23 24 25 26 27</p>	<p>one media node.</p> <p>Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.</p> <p>Source: https://support.discord.com/hc/en-us/articles/4412085582359 (annotated)</p> <p>Mobile clients</p> <p>You can find the <u>text chat in a voice channel on your iOS or Android device</u> by going through the steps below:</p> <ol style="list-style-type: none"> 1. Go to the server with the voice channel you want to join and press on the voice channel's name. 2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI. 3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously. <p>For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.</p> <p>Source: https://support.discord.com/hc/en-us/articles/4412085582359 (annotated)</p>
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Figure 67 – Excerpt from Page 66 of Exhibit 4.

1 **Sending Photos And Files**

2 Want to stay in chat and directly send a photo without opening your camera app?

3 1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.

4 2. This will let you view your photos within your photo gallery or select the Camera button.

5 3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within

6 Discord. Then, you will be able to take a photo.

7 4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to

8 your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

Figure 68 – Excerpt from Page 67 of Exhibit 4.

10 **Adding A Friend In A Server**

11 1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap

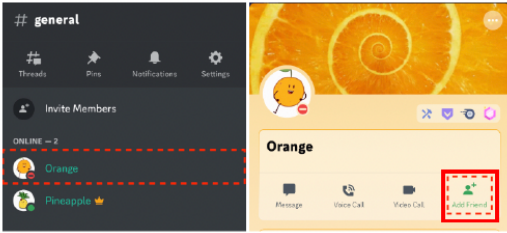
12 on that person's username in the server list or press on the user's avatar in chat to open their **User**

13 **Profile**.

14 2. Once you've opened their profile, you'll be able to select the **Add Friend** option to send a Friend

15 Request.

16 *friend's mobile device ("media node")*



17 Source: <https://support.discord.com/hc/en-us/articles/360046618751> (annotated)

18 Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

19 [17.3] a Company makes, uses, sells and/or offers to sell a communication link structured to dispose said at least one media terminal and said at least one media node in a communicative relation with

20 This element is infringed literally, or in the alternative, under the doctrine of equivalents.

21 For example, once connected to the wireless internet, the user initiates the login process to their Discord account using his mobile device ("media terminal"). This involves entering login credentials such as email and password through the wireless connection ("one interactive computer network"). Further, the user adds his friend so that he can communicate with them through text chat in the voice channel. Consequently, this procedure establishes a communication channel

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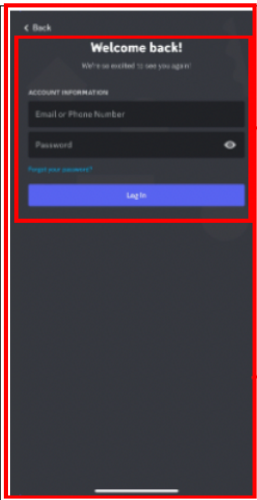
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Figure 69 – Excerpt from Page 68 of Exhibit 4.

<p>1 one another via 2 said inter 3 active 4 computer 5 network,</p>	<p>(“communication link structured to dispose”) between the user’s mobile device and the friend’s mobile device (“media node”).</p> <p>Logging Into Your Account</p> <p>If you’re on a browser, start by heading to https://discord.com/login!</p> <p>If you’re on a desktop or mobile device, you can directly open the Discord app on your device! (You can learn more information on downloading the app here.)</p> <p>Once you’re at the login page, type in either 1) your email address or 2) phone number that has been officially verified to your Discord account in the first text box.</p> <p>Note: You will need to verify your phone number to your Discord account before using phone number login! Click here to learn how to verify your phone number to your Discord account.</p> <p>In the second box, type the password associated with your account!</p> <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p>
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8 Figure 70 – Excerpt from Page 69 of Exhibit 4.

	 <p>10 Log In to Discord 11 account</p> <p>14 media terminal</p> <p>17 Source: https://support.discord.com/hc/en-us/articles/360046618751 (annotated)</p> <p>18 What Is A Server?</p> <p>19 Discord gives you the power to <u>create an invite-only home for your friends</u> or community - a place where 20 you can talk, hang out, and have fun. We call these special places - servers, and they look like this: 21 Source: https://support.discord.com/hc/en-us/articles/360045138571</p>
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21 Figure 71 – Excerpt from Page 70 of Exhibit 4.

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- You can join or create servers for all kinds of communities -- be it a book club 📖, a dance class 💃, a study group 📚, or just some friends you want to spend time with.

How To Use Text And Voice Channels

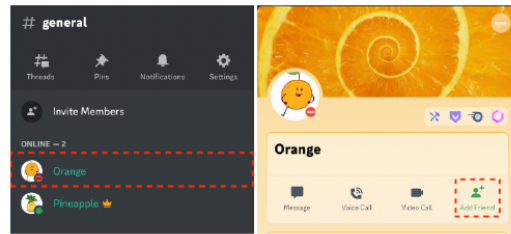
Your server is made up of **text channels** and **voice channels**.

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Adding A Friend In A Server

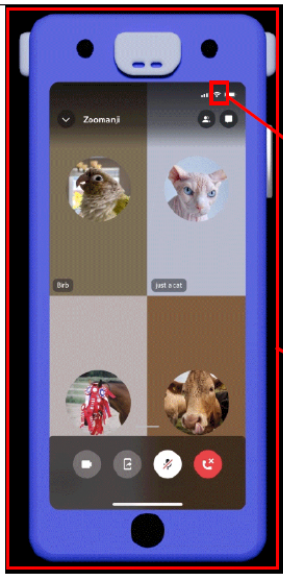
1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their **User Profile**.
2. Once you've opened their profile, you'll be able to select the **Add Friend** option to send a Friend Request.

user's mobile device ("media terminal") add friend



Source: <https://support.discord.com/hc/en-us/articles/360046618751> (annotated)

Figure 72 – Excerpt from Page 71 of Exhibit 4.



interactive computer network

media terminal

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

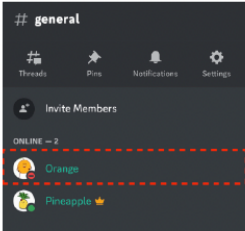
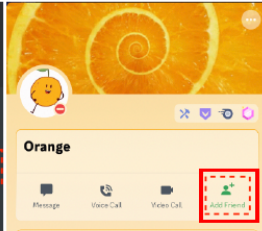
Figure 73 – Excerpt from Page 72 of Exhibit 4.

	<p>Here are the steps we recommend to resolve the above errors:</p> <ol style="list-style-type: none"> 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works. 2. Check with your internet service provider and make sure there are no outages in your area. 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled 4. Check your VPN (Discord only works on VPNs that have UDP) 5. Check with your network admin - If you're on a work/school network, Discord could be blocked! 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override. - You're also able to change a voice region in private voice calls <p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[17.4] said communication link being initiated by said at least one media terminal.</p>	<p>Company makes, uses, sells and/or offers to sell said communication link being initiated by said at least one media terminal.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user adds his friends so that he can communicate with them through text chat in the voice channel. Consequently, this procedure establishes a communication channel between the user's mobile device ("media terminal") and the friend's mobile device ("said communication link being initiated by said at least one media terminal").</p>

Figure 74 – Excerpt from Page 73 of Exhibit 4.

Adding A Friend In A Server

1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their **User Profile**.
2. Once you've opened their profile, you'll be able to select the Add Friend option to send a Friend Request.

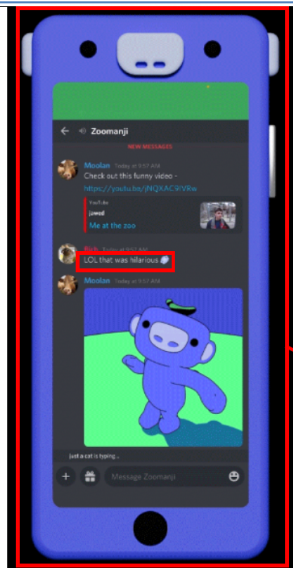



user's mobile device ("media terminal") adds friend

Source: <https://support.discord.com/hc/en-us/articles/360046618751> (annotated)

Figure 75 – Excerpt from Page 74 of Exhibit 4.

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media
terminal

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

What Is A Server?

Discord gives you the power to create an invite-only home for your friends or community - a place where you can talk, hang out, and have fun. We call these special places - **servers**, and they look like this:

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Figure 76 – Excerpt from Page 75 of Exhibit 4.

1 • You can join or create servers for all kinds of communities -- be it a book club 📖, a dance class 🕺, a study group 📚, or just some friends you want to spend time with.

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3 **How To Use Text And Voice Channels**

4 Your server is made up of **text channels** and **voice channels**.
Source: <https://support.discord.com/hc/en-us/articles/360045138571>

5 **Voice channels** are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk, wave hello over video, or share their screen.

6 Source: <https://support.discord.com/hc/en-us/articles/360045138571>

7 Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

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11 **Where Can I Find The Text Chat In A Voice Channel?**

12 Every voice channel has an associated text chat that users can utilize if their role or the channel has the appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand corner of the voice UI (and a swipe-left gesture for mobile!).

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Figure 77 – Excerpt from Page 76 of Exhibit 4.

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16 Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

17 Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

18 [17.5] said at least one media node and said at least one media terminal structured to transmit said at least one digital media file therebetween via said communication link, wherein

19 Company makes, uses, sells and/or offers to sell said at least one media node and said at least one media terminal structured to transmit said at least one digital media file therebetween via said communication link.

20 This element is infringed literally, or in the alternative, under the doctrine of equivalents.

21 For example, the user's mobile device ("media terminal") utilizes the established communication channel for sending ("transmit") the text chat ("digital media file") to the friend's mobile device ("media node").

22 **Voice channels** are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk, wave hello over video, or share their screen.

23 Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Figure 78 – Excerpt from Page 77 of Exhibit 4.

1 Using the embedded text chat of voice channels, users can send message content, comment on
 2 something being said without interrupting the speaker, and share links, memes, and more, all in the
 3 dedicated text chat within the voice channel. This feature also means users don't have to switch to a
 4 different text channel while in a voice channel, missing the stream you're actively watching or potentially
 5 distracting you from the live conversation happening in the voice channel.

6 **Where Can I Find The Text Chat In A Voice Channel?**

7 Every voice channel has an associated text chat that users can utilize if their role or the channel has the
 8 appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message
 bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand
 corner of the voice UI (and a swipe-left gesture for mobile!).

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

digital media file

Figure 79 – Excerpt from Page 78 of Exhibit 4

10 **Mobile clients**

11 You can find the text chat in a voice channel on your iOS or Android device by going through the steps
 12 below:

- 13 1. Go to the server with the voice channel you want to join and press on the voice channel's name.
- 14 2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a
 message bubble icon in the upper right-hand corner of the voice UI.
- 15 3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can
 also join voice and see the text chat simultaneously.

16 For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring
 17 the text chat into view.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Figure 80 – Excerpt from Page 79 of Exhibit 4.

19 **Sending Photos And Files**

20 Want to stay in chat and directly send a photo without opening your camera app?

- 21 1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
- 22 2. This will let you view your photos within your photo gallery or select the Camera button.
- 23 3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within
 24 Discord. Then, you will be able to take a photo.
- 25 4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to
 26 your friends.

Source: <https://support.discord.com/hc/en-us/articles/360046618751>

Figure 81 – Excerpt from Page 80 of Exhibit 4.

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	<p>Adding A Friend In A Server</p> <p>1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their User Profile.</p> <p>2. Once you've opened their profile, you'll be able to select the Add Friend option to send a Friend Request.</p>  <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[17.6] said communication link is structured to bypass at least one media terminal security measure.</p>	<p>Company makes, uses, sells and/or offers to sell said communication link is structured to bypass at least one media terminal security measure.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user's mobile device ("media terminal") and the friend's mobile device initially requires to enter login credentials such as an email and a password ("security measure") for login into Discord server. The server does not require both the user and his friend to input the email and password ("security measure") every time they communicate. Instead, the email and password input are necessary during the initial connection process, and thereafter, both user and his friend's mobile device automatically exchanges data without requiring users to re-enter the email and password</p>

Figure 82 – Excerpt from Page 81 of Exhibit 4.

	<p>("bypass at least one media terminal security measure"). Therefore, upon information and belief, the communication link structured to bypass at least one media terminal security measure.</p> <p>Logging Into Your Account</p> <p>If you're on a browser, start by heading to https://discord.com/login!</p> <p>If you're on a desktop or mobile device, you can directly open the Discord app on your device! (You can learn more information on downloading the app here.)</p> <p>Once you're at the login page, type in either 1) your email address or 2) phone number that has been officially verified to your Discord account in the first text box.</p> <p>Note: You will need to verify your phone number to your Discord account before using phone number login! Click here to learn how to verify your phone number to your Discord account.</p> <p>In the second box, type the password associated with your account!</p> <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p>
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Figure 83 – Excerpt from Page 82 of Exhibit 4.

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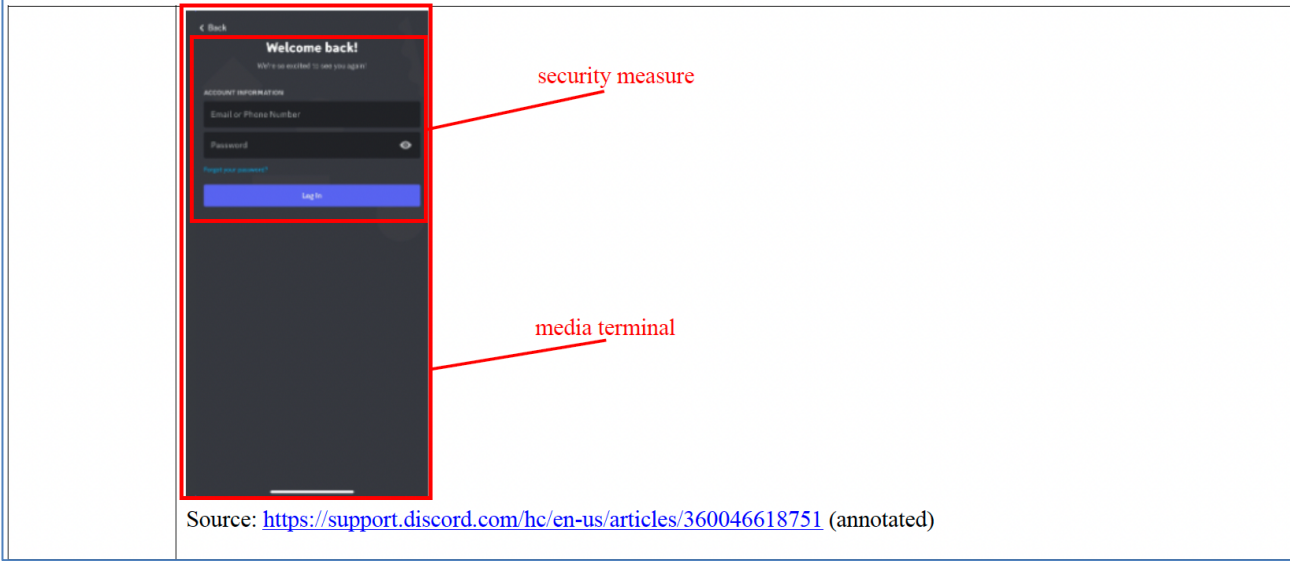


Figure 84 – Excerpt from Page 83 of Exhibit 4.



Figure 85 – Excerpt from Page 84 of Exhibit 4.

1 Using the embedded text chat of voice channels, users can send message content, comment on
 2 something being said without interrupting the speaker, and share links, memes, and more, all in the
 3 dedicated text chat within the voice channel. This feature also means users don't have to switch to a
 4 different text channel while in a voice channel, missing the stream you're actively watching or potentially
 5 distracting you from the live conversation happening in the voice channel.

Where Can I Find The Text Chat In A Voice Channel?

6 Every voice channel has an associated text chat that users can utilize if their role or the channel has the
 7 appropriate permissions. Across all clients, you can access the text chat in a voice channel via a **message**
 8 **bubble icon** by hovering over the voice channel name in the server channel list or in the top-right hand
 corner of the voice UI (and a swipe-left gesture for mobile!).

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

9 Figure 86 – Excerpt from Page 85 of Exhibit 4.

10 **Mobile clients**

11 You can find the text chat in a voice channel on your iOS or Android device by going through the steps
 12 below:

- 13 1. Go to the server with the voice channel you want to join and press on the voice channel's name.
- 14 2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a
 message bubble icon in the upper right-hand corner of the voice UI.
- 15 3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can
 also join voice and see the text chat simultaneously.

16 For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring
 the text chat into view.

17 Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

18 Figure 87 – Excerpt from Page 86 of Exhibit 4.

19 **Sending Photos And Files**

20 Want to stay in chat and directly send a photo without opening your camera app?

- 21 1. You can send a photo on the fly to your friends by tapping the **Add File** icon in the bottom left corner.
- 22 2. This will let you view your photos within your photo gallery or select the Camera button.
- 23 3. If you would like to directly take a photo, select the **Camera** button to open the Camera app within
 24 Discord. Then, you will be able to take a photo.
- 25 4. Once you have taken or chosen the photo, you will be able to send a message along with the photo to
 your friends.

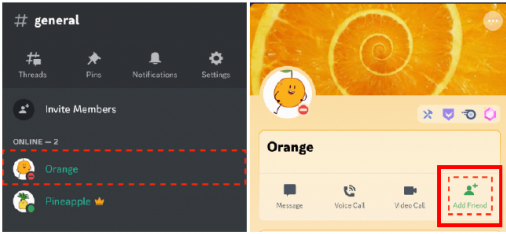
26 Source: <https://support.discord.com/hc/en-us/articles/360046618751>

27 Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall
 28 supplement these contentions pursuant to production of such source code by the Defendant.

Figure 88 – Excerpt from Page 87 of Exhibit 4.

<p>1 [18] The digital 2 communication 3 protocol recited 4 in claim 17 5 further 6 comprising a 7 wireless range 8 structured to 9 permit 10 authorized 11 access to said at</p>	<p>Company makes, uses, sells and/or offers to sell a wireless range structured to permit authorized access to said at least one interactive computer network.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user's mobile device logs in to the router by entering its login credentials ("authorized access") on its mobile device for establishing a wireless connection to the wireless internet ("interactive computer network"). As wireless routers inherently possess a specified range, therefore, it is apparent to a person having ordinary skill in the art that a wireless range is structured to permit authorized access to at least one interactive computer network.</p>
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6 Figure 89 – Excerpt from Page 87 of Exhibit 4.

<p>7 least one 8 interactive 9 computer 10 network.</p>	<p>Here are the steps we recommend to resolve the above errors:</p> <ol style="list-style-type: none"> 1. Restart your Modem+Router+Computer - You'd be surprised how often the "turn it off and turn it back on again" trick works. 2. Check with your internet service provider and make sure there are no outages in your area. 3. Check your Firewall/Antivirus and make sure that Discord is allowlisted/temporarily disabled 4. Check your VPN (Discord only works on VPNs that have UDP) 5. Check with your network admin - If you're on a work/school network, Discord could be blocked! 6. Change the voice region - If you're the admin, temporarily switch to try a different voice region in Voice Channel Settings > Overview > Region Override. - You're also able to change a voice region in private voice calls <p>Source: https://support.discord.com/hc/en-us/articles/115001310031-Voice-Connection-Errors</p> <h3 style="color: #e67e22;">Adding A Friend In A Server</h3> <ol style="list-style-type: none"> 1. If you're already in a server, and you'd like to add someone you've become friends with, you can also tap on that person's username in the server list or press on the user's avatar in chat to open their User Profile. 2. Once you've opened their profile, you'll be able to <u>select the Add Friend option</u> to send a Friend Request.  <p>Source: https://support.discord.com/hc/en-us/articles/360046618751</p>
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21 Figure 90 – Excerpt from Page 88 of Exhibit 4.

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Voice channels are where you can hang out over voice and video. There's no calling or ringing required - just click on a voice channel to enter it. Friends in your server can see you're in there, and pop in to talk, wave hello over video, or share their screen.

Source: <https://support.discord.com/hc/en-us/articles/360045138571>

Using the embedded text chat of voice channels, users can send message content, comment on something being said without interrupting the speaker, and share links, memes, and more, all in the dedicated text chat within the voice channel. This feature also means users don't have to switch to a different text channel while in a voice channel, missing the stream you're actively watching or potentially distracting you from the live conversation happening in the voice channel.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>

Mobile clients

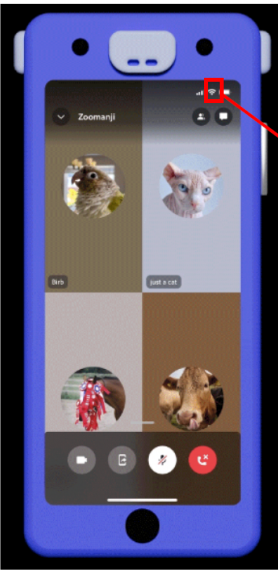
You can find the text chat in a voice channel on your iOS or Android device by going through the steps below:

1. Go to the server with the voice channel you want to join and press on the voice channel's name.
2. In the following screen that appears, you will see the buttons "Join Voice" and "Join Muted" plus a message bubble icon in the upper right-hand corner of the voice UI.
3. Pressing on the message bubble icon will reveal the text chat without joining the voice call. You can also join voice and see the text chat simultaneously.

For an additional way to access chat, simply swipe left on your phone while in the voice channel to bring the text chat into view.

Figure 91 – Excerpt from Page 89 of Exhibit 4.

Source: <https://support.discord.com/hc/en-us/articles/4412085582359>



interactive computer network

Source: <https://support.discord.com/hc/en-us/articles/4412085582359> (annotated)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

Figure 92 – Excerpt from Page 90 of Exhibit 4.

1 24. Plaintiff is entitled to recover damages adequate to compensate for Defendant's
2 infringement.

3 25. Defendant's actions complained of herein will continue unless Defendant is enjoined
4 by this Court.

5 26. The '195 Patent is valid, enforceable, and was duly issued in full compliance with
6 Title 35 of the United States Code.

7 27. Defendant has committed these acts of literal infringement, or infringement under
8 the doctrine of equivalents of the '195 Patent, without license or authorization.

9 28. As a result of Defendant's infringement of the '195 Patent, injured Plaintiff has
10 suffered monetary damages and is entitled to a monetary judgment in an amount adequate to
11 compensate for Defendant's past infringement, together with interests and costs.
12

13 29. Plaintiff is in compliance with 35 U.S.C. § 287.

14 30. As such, Plaintiff is entitled to compensation for any continuing and/or future
15 infringement of the '195 Patent up until the date that Defendant ceases its infringing activities or
16 until expiration projected by Google Patents to be no earlier than February 6, 2032.
17

18 31. Defendant's infringement is willful as it had knowledge of the patents through its
19 Freedom to Operate analysis performed on information and belief, through conversations about its
20 alleged infringement with counsel for Display Technologies, LLC, and via this lawsuit.
21

22 **DEMAND FOR JURY TRIAL**

23 32. Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury
24 of any issues so triable by right.

25 **PRAYER FOR RELIEF**

26 WHEREFORE, Plaintiff asks the Court to:

- 27 (a) Enter judgment for Plaintiff on this Complaint on all cases of action asserted herein;
28 (b) Enter an Order enjoining Defendant, its agents, officers, servants, employees,

1 attorneys, and all persons in active concert or participation with Defendant who receives notice of the
2 order from further infringement of Patents (or, in the alternative, awarding Plaintiff running royalty
3 from the time judgment going forward);

4 (c) Award Plaintiff damages resulting from Defendants infringement in accordance with
5 35 U.S.C. § 284; et al.

6 (d) Award Plaintiff such further relief to which
7 the Court finds Plaintiff entitled under law or equity

8
9 Dated: February 6, 2024

Respectfully served,
GARTEISER HONEA, PLLC

11 */s/ Randall Garteiser*

12 Randall Garteiser
13 CA State Bar No. 231821
14 rgarteiser@ghiplaw.com
15 Christopher A. Honea
16 CA State Bar No. 232473
17 chonea@ghiplaw.com
18 **GARTEISER HONEA, PLLC**
19 119 W. Ferguson Street
20 Tyler, Texas 75702
21 Telephone: (903) 705-7420

Attorneys for Plaintiff

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