

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

**VIRTUAL CREATIVE ARTISTS, LLC,**

Plaintiff,

v.

**BUZZFEED, INC.,**

Defendant.

C.A. No. 1:24-cv-05346

**JURY TRIAL DEMANDED**

**PATENT CASE**

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Virtual Creative Artists, LLC files this Original Complaint for Patent Infringement against Buzzfeed, Inc. and would respectfully show the Court as follows:

**I. THE PARTIES**

1. Plaintiff Virtual Creative Artists, LLC (“VCA” or “Plaintiff”) is a Delaware limited liability company, having business address at 338 Gracious Way, Henderson, NV 89011.

2. On information and belief, Defendant Buzzfeed, Inc. (“Buzzfeed” or “Defendant”) is a corporation organized and existing under the laws of Delaware. Defendant has its principal place of business at 229 West 43rd St, 10th Floor New York, NY 10036. Defendant has a registered agent at C T Corporation System, 28 Liberty Street, New York, NY, 10005.

**II. JURISDICTION AND VENUE**

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and the New York Long-Arm Statute, due at least to

its business in this forum, including at least a portion of the infringements alleged herein at 229 West 43rd St, 10th Floor New York, NY 10036.

5. Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within New York. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in New York. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within New York. Defendant has committed such purposeful acts and/or transactions in New York such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant has businesses in this district at 229 West 43rd St, 10th Floor New York, NY 10036. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this District under 28 U.S.C. § 1400(b).

**III. COUNT I**  
**(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,501,480)**

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On November 22, 2016, United States Patent No. 9,501,480 ("the '480 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '480 Patent is

titled “Revenue-Generating Electronic Multi-Media Exchange and Process of Operating Same.” A true and correct copy of the ‘480 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. VCA is the assignee of all right, title, and interest in the ‘480 Patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘480 Patent. Accordingly, VCA possesses the exclusive right and standing to prosecute the present action for infringement of the ‘480 Patent by Defendant.

11. The invention relates to the field of creating and distributing media content, in particular, creating media content based upon submissions received on an electronic media exchange. At the time of the original invention in 1998, there was an Internet-centric problem that required a technical solution—how to develop a computer system that would allow remote contributors of electronic content to share and collaborate their content to develop new media content. The claimed invention, which predates modern crowdsourcing solutions, offers a unique, unconventional, and specially configured combination of “subsystems” in which to address the Internet-centric problem.

12. As set forth in the claims, the claimed invention has a collection of unconventional and particularly configured subsystems, including:

- “an electronic media submissions server subsystem,”
- “an electronic multimedia creator server subsystem,”
- “an electronic release subsystem,”
- “an electronic voting subsystem,” and
- their corresponding specialized databases.

13. Each of these subsystems are configured in a very specific (and not generic), unconventional and non-routine manner to offer the novel and non-obvious claimed invention.

For example, claim 1 requires an “electronic media submissions database,” which is a subsystem that receives media submissions from Internet users. This is not a generic database but rather a scalable database that must be able to receive, store, and manage multiple petabytes of multimedia data received from users all over the world. This is one of the many specialized databases required in the claim. In fact, the specification discloses the use of a sophisticated database management system known in the art at the time that was capable of handling data at this level, Oracle7. This type of database management system cannot operate on a generic computing system but rather requires specialized hardware and software.

14. As another example, the claim requires a specifically configured “electronic media submission server subsystem.” This subsystem is defined as specifically having:

- “one or more data processing apparatus,”
- “an electronic media submission database stored on a non-transitory medium,”  
and
- “a submissions electronic interface.”

The “submissions electronic interface” is further specifically “configured” [1] “to receive electronic media submissions from a plurality of submitters over a public network, and [2] store the electronic media submissions in the electronic media submission database.” Further, “the electronic media submissions database” in this subsystem is further required to “store[] [1] data identifying the submitter and [2] data indicating content for each electronic media submission.” Collectively, the level of detail included in this very particular, well-defined, and unconventional subsystem makes clear that the claims include substantially more than the alleged abstract idea or merely performing an alleged abstract idea on a computer.

15. Similarly, the claim also requires a separate specifically configured “an electronic multimedia creator server subsystem.” The claim specifically defines how this second subsystem

interacts with other components including being “operatively coupled to the electronic media submissions server subsystem.” The claim also specifically defines this subsystem as “having”:

- “one or more data processing apparatus” and
- “an electronic creator multimedia database stored on a non-transitory medium.”

16. This subsystem is also specifically “configured [1] to select and [2] retrieve a plurality of electronic media submissions from the electronic media submissions database using an electronic content filter located on the electronic multimedia creator server.” The “filter” also includes a very specific algorithm of “being based at least in part on at least one of the one or more user attributes to develop multimedia content to be electronically available for viewing on user devices.” Even more detail is provided by requiring “the identification of the submitter [be] maintained with each selected and retrieved submission within the multimedia content.” Here again, collectively, the level of detail included in this very particular and well-defined and unconventional subsystem makes clear that the claims include substantially more than an alleged abstract idea or merely performing an alleged abstract idea on a computer.

17. The claim also includes “an electronic release subsystem,” which is well defined and not conventional or routine. The claim defines how this subsystem is “operatively coupled to the electronic multimedia creator server subsystem.” The claim also defines the components of this subsystem as having “one or more data processing apparatus” and being particularly “configured to make the multimedia content electronically available for viewing on one of more user devices.” These details, collectively, also make this very particular and well-defined and unconventional subsystem substantially more than an abstract idea or performing an abstract idea on a computer.

18. The claim also requires “an electronic voting subsystem,” which is well-defined, specific, and unconventional. This claimed subsystem has “one or more data processing apparatus” and is specifically “configured to enable a user to electronic vote for or electronically rate an electronically available multimedia content or an electronic media submission within a respective electronically available multimedia content.”

19. Claim 1 is a specific and discrete implementation. For example, the claim requires an “electronic content filter” located at the server, remote from end users, and customizable based on user attributes. As another example, the “electronic voting subsystem” at the time of the invention was novel and inventive and added sufficient inventive contributions to avoid a risk of preempting creating and distributing media content. It is possible to create and distribute media content without ever having to include a “voting” subsystem on what components should be included in such media content. The detailed configuration “to enable a user to vote for or electronically rate an electronically available multimedia content or an electronic media submission within a respective electronically available multimedia content” has the level of particularity that avoids any risk of preemption.

20. Furthermore, the very particular and specifically configured “electronic media creator subsystem” not only provides a detailed and unique physical structure and interrelationship with other claimed components, but also includes a very specific configuration that is not conventional or routine. The claims make clear the interrelationship of the “electronic multimedia creator server subsystem” with respect to “the electronic media submission server subsystem” which must be “operatively coupled” thereto. The claims also provide detail on how the “electronic media creator subsystem” is “configured” “to select and retrieve a plurality of electronic media submissions from the electronic media submission database using an electronic

filter.” They also provide detail on how the “electronic filter” is “based at least in part on at least one of the one or more user attributes” and specifies that “the identification of the submitter is maintained with each selected and retrieved submission within the multimedia content.”

21. These arguments overcame a patent eligibility rejection under 35 U.S.C. §101 of the claim at issue during the prosecution of the ‘480 patent before the United States Patents and Trademark Office.

22. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claim 1 of the ‘480 Patent in New York, and elsewhere in the United States, by employing a computer-based system using <https://www.buzzfeed.com/> (“Accused Instrumentality”) (*e.g.*, <https://www.buzzfeed.com/>). BuzzFeed uses a computer-based system for its Accused Instrumentality to enable user-submitters to create profiles and publish multimedia content pertaining to pop-culture, current topics, US domestic and world news (hereinafter referred to as “Articles”). Articles may also include multimedia content pertaining to “listicles” (articles having a list format) and/or quizzes, inviting participation and comment from other active users. In May 2013, BuzzFeed launched the “Community,” enabling users to submit multimedia content in the form of Articles (including listicles and/or quizzes). Multimedia content pertaining to a user’s profile includes image and textual content *e.g.*, a profile picture, a biography and affiliated links. Multimedia content pertaining to an Article includes image, video and textual content, including interactive links (such as quizzes). The Articles and associated multimedia content may be shown to other users based on, *inter alia*, user attributes and/or Article attributes. The Accused Instrumentality employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus in order to serve multimedia profile and/or post content with associated photo, profile picture, and

textual content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. For example, as shown below, multimedia content associated with the Article or a contributor/user profile is provided on various user devices (*e.g.*, computers or other devices with a web browser or app) in response to a user logging in to the Accused Instrumentality. BuzzFeed uses function-specific subsystems, for example as discussed below. BuzzFeed, during the relevant time period, took advantage of multiple cloud server providers for the Accused Instrumentality, as discussed above, as well as scalability within its cloud server providers, employing separate server subsystems for all its meaningfully different functions. BuzzFeed uses, and has used during the relevant time period, numerous different networks and providers for, *inter alia*, content management systems, web servers, web hosting, data centers, proxy certificates, SSL certificates, traffic analysis, advertising, and tagging, thereby using separate server subsystems for all its meaningfully different functions, such as those indicated below.



Stephen LaConte (stephenlacon...)

web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte

INTERNET ARCHIVE  
Wayback Machine  
2,406 captures  
2 Jun 2017 - 9 May 2024

BuzzFeed News REVIEWS TASTE Goodful As/Is

BuzzFeed Quizzes Videos Shopping Merch Newsletters

LOL win

**Stephen LaConte**  
Staff writer in LA. Big fan of your dog.

English Posts All Posts

**Demi Lovato Just Knocked Her Trainer's Tooth Out And Shared The Aftermath On Instagram**  
Sorry.....not sorry?  
Stephen LaConte • 23 hours ago

**20 People Who Are Definitely Having A Worse Winter Than You**  
Things could always be worse!  
Stephen LaConte • One day ago

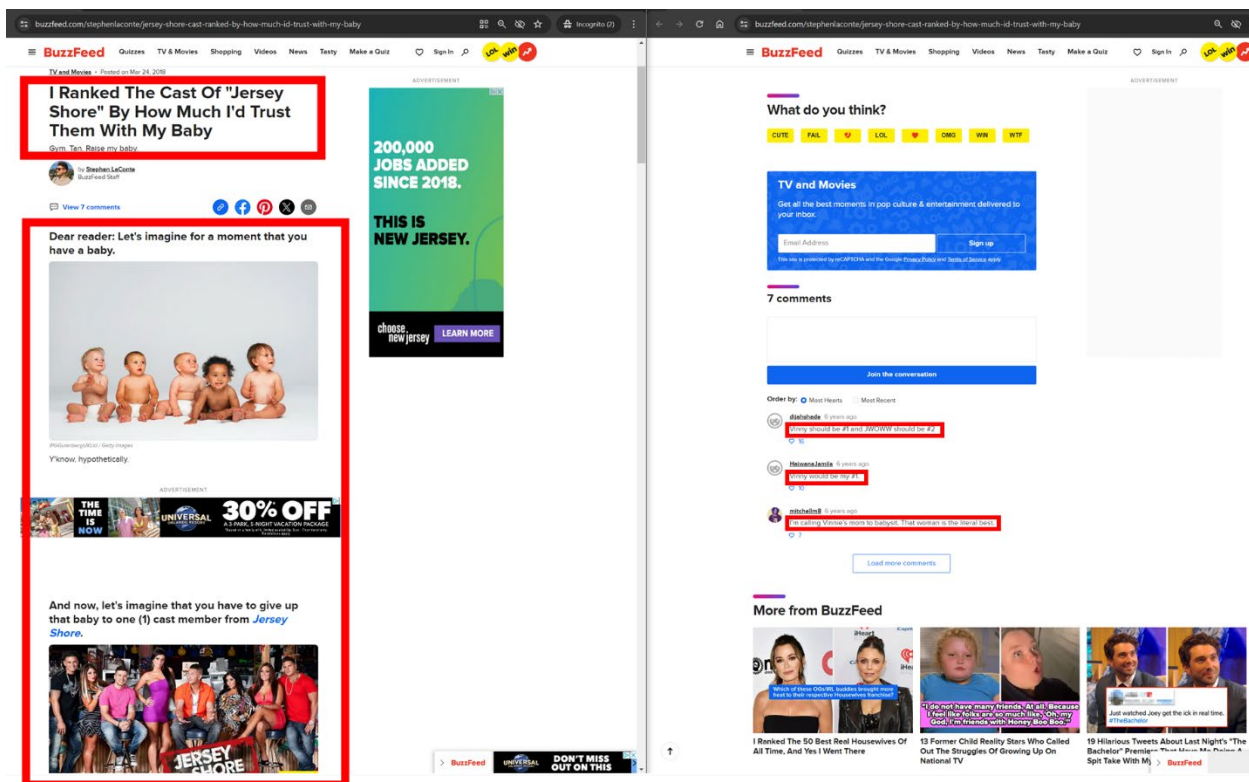
**People Are Sharing The Most Inappropriate Things They've Seen At Funerals And OMG It's A Lot**  
"Everyone left my great-grandma's funeral early to loot her house."  
Stephen LaConte • One day ago

**The Trailer For The New Season Of "Queer Eye" Just Dropped And Holy Guacamole It's Emotional**  
March 15 can't come soon enough.  
Stephen LaConte • 2 days ago

Like On Facebook

Follow On Twitter

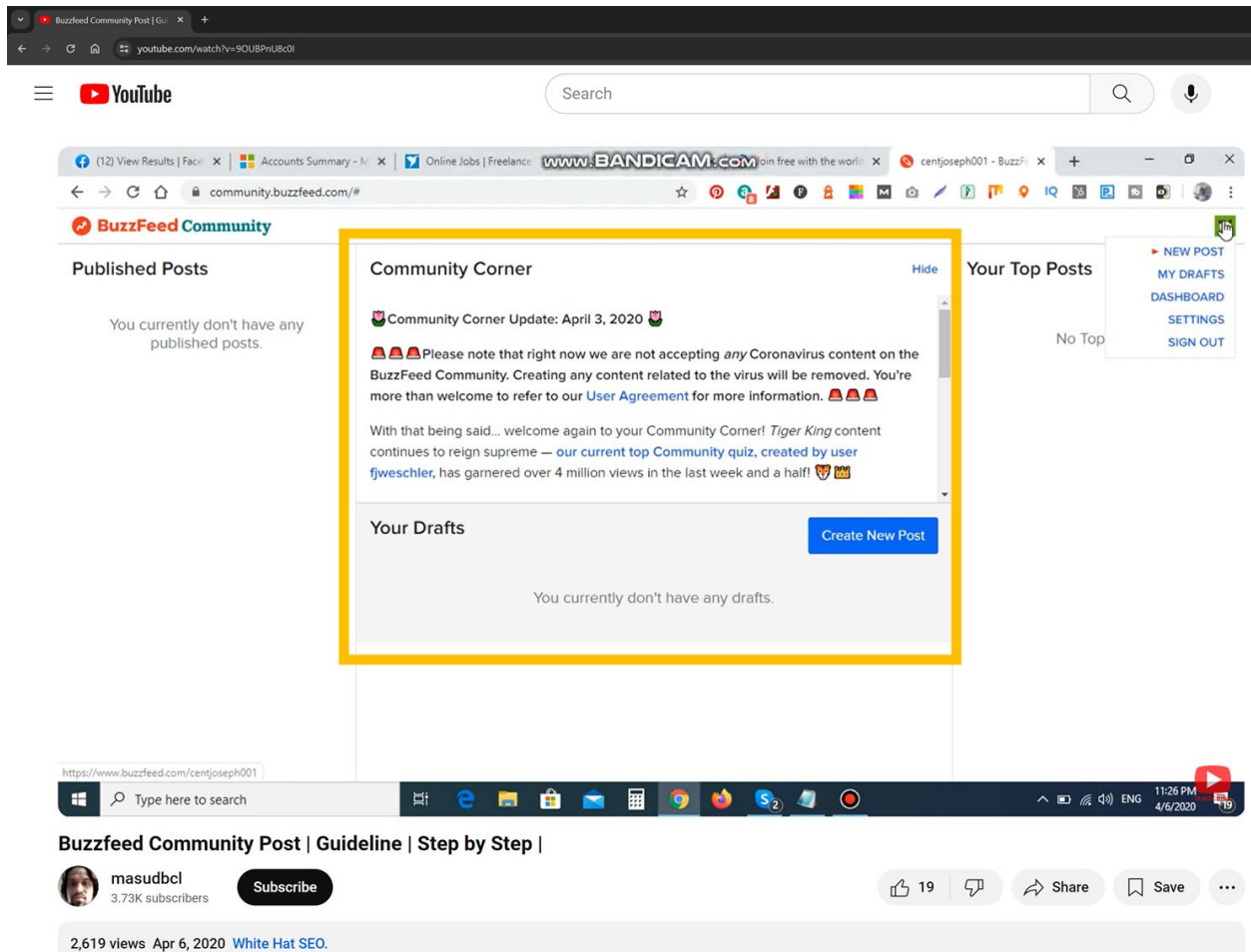
(E.g., <https://web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte>).



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

23. The Accused Instrumentality includes an electronic media submissions server subsystem, having one or more data processing apparatus and an electronic media submissions database stored on a non-transitory medium in order to process and store received submissions from a plurality of user-submitters, for example content pertaining to their respective electronic media submission (e.g., Article or comment on an Article) on the Accused Instrumentality, as well as multimedia content (e.g., photo and/or textual content) to be displayed on a main page or within the Article, as discussed and shown for example in connection with the above discussion. Individual users may create a profile and submit content pertaining to their user profile and/or Article or comment on an Article. The submissions are provided to the Accused Instrumentality via a submissions electronic interface, e.g., a web-based content portal, accessible for example by

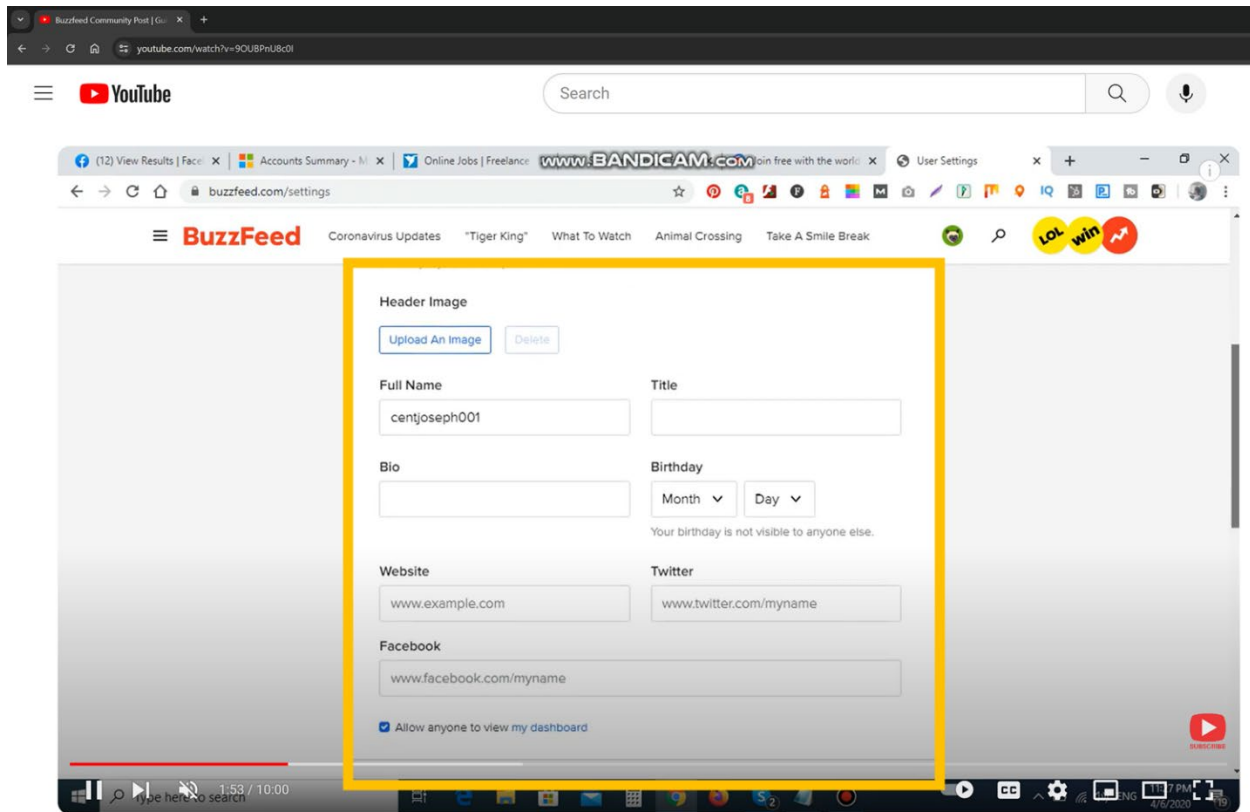
logging in and selecting an option to upload such content or import content, configured to receive such electronic media, from a plurality of submitters (e.g., user-submitters) over a public network (e.g., the Internet) and stored, via an uploading process, in said electronic media Listings database for use in distribution to other users of the Accused Instrumentality.



(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

The screenshot displays a YouTube video player interface. At the top, the YouTube logo and search bar are visible. Below the video player, the video title "Buzzfeed Community Post | Guideline | Step by Step |" is shown, along with the channel name "masudbcl" and "3.73K subscribers". Interaction buttons for "Like" (19), "Comment", "Share", and "Save" are present. The video content itself is a screen recording of the BuzzFeed website's profile settings page, which is highlighted with a yellow border. The settings page includes sections for "Profile Photo and Username" (with "Upload New Photo" and "Delete Photo" buttons), "Username" (containing "centjoseph001" and a note: "Choose wisely! You can only change this once, and only if you haven't posted."), "Header Image" (with "Upload An Image" and "Delete" buttons), and "Full Name" and "Title" fields.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).



(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

The screenshot displays a YouTube video player. The video content is a BuzzFeed Community post by Md Masudul Hasan. The post features a large yellow-bordered box with the following text: "Welcome to the BuzzFeed Community!" followed by "BuzzFeed Community is a hub for BuzzFeeders to create awesome quizzes and posts that people love." Below this is a blue button that says "Create your first post!" and a link "Or browse what others are doing". At the bottom of the box, it says "Don't know where to start?" with a smiley face icon and "Learn how to make an awesome post with these guides made by our BuzzFeed Staff." To the right of the main text, there is a section titled "seolistly's Trophies (1)" showing a trophy icon and the text "Latest Trophy: You Exist!". The video player interface includes the YouTube logo, a search bar, and a video title "Buzzfeed Community Post | Guideline | Step by Step |". Below the video, the channel name "Md Masudul Hasan" is shown with "3.73K subscribers" and a "Subscribe" button. There are 19 likes, a share button, and a save button. The video has 2,619 views and was posted on Apr 6, 2020.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

YouTube  
community.buzzfeed.com/post

**BuzzFeed Community**

Draft Post

Save Preview Publish Now

Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Edit Mode

- List
- Sort

Earn From Home. Work From Home.

Join free with the world best online marketplace. Completely free method to earn from online.

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

- Plain List
- Numbered
- Countdown

Thumbnails

Drag and drop or click to upload

Select From Post

Community Tags

After you save your post, add a relevant tag to increase its chances of being promoted by our staff!

Save your draft first, then we can assign it to a challenge.

masudbcl  
3.73K subscribers  
Subscribe

19 19 Share Save

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Save Preview Publish Now

Edit Mode

- List
- Sort

Completely free to join... free to Listing... 5\$ coupon for you if you want to buy any 5\$ SEO Services from me. masudbcl SEOListly.com/Marektplace

Credit Who created or owns this? Via Where did you find it (URL?)

Description

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

- Plain List
- Numbered
- Countdown

Thumbnails

Drag and drop or click to upload

Select From Post

Community Tags

After you save your post, add a relevant tag to increase its chances of being promoted by our staff!

Not an initiative post

masudbcl 3.73K subscribers Subscribe

19 Comments Share Save

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).



Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Save Preview Publish Now

SEOListly.com  
skype: masudbcl

Credit masudbcl Via http://www.seolistly.com

Description

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

- Plain List
- Numbered
- Countdown

Not an Initiative post

- Challenge Submission
- List
- Tumblr roundup
- Trivia Quiz
- Friends
- Harry Potter
- Love & Relationships
- Disney/Marvel
- Nostalgia
- Netflix shows
- K-POP
- UK

Not an Initiative post





masudbcl  
3.73K subscribers



19 likes

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

**To find your personal dashboard, make sure you're logged in on a computer, then click the bell on the upper-right-hand side of BuzzFeed. Next, click "Dashboard."**

Tasty    

je  **Anna Kopsky** 

- New Post
- My Wishlist
- My Drafts
- Dashboard**
- Account Settings
- Log Out

*BuzzFeed*

*Canva/Anna Kopsky*

**It's important to note that \*everyone's\* dashboard numbers will look different because yours shows data specifically from the posts you've created.**

**Here's an \*example\* of how a dashboard might look, and we'll use this specific chart to break down how it all works.**

*BuzzFeed*

Please note that your dashboard page will not display a chart unless you've created at least one post!

**First, you'll want to set the region and time frame from which you'd like to view data. You can do this on the upper-right-hand side of your dashboard page.**

(E.g., <https://web.archive.org/web/20210205221127/https://www.buzzfeed.com/annakopsky/dashboard-dashbird-guide>).

**The chart displayed on your dashboard is a visual representation of the number of viral and seed views your posts have earned.**

*BuzzFeed*

Both the right and left sides of this chart display the number of views from lowest at the bottom to highest at the top. Along the bottom of the chart are dates showing when there were spikes or dips in views.

**Hovering over any part of this chart will display view numbers from a specific date, including seed and viral views.**

*BuzzFeed*

**And if you're not a chart person, the right-hand side of your Dashboard displays the exact number of views your posts have earned over the time frame you set. Hovering over the question marks below each number will break down from where these views came.**

*BuzzFeed*

**After admiring your chart, scroll down a bit to find a list of your top posts by views. You can sort these by date or by views. Remember, you can change the time frame at the top of the dashboard page to see which posts of yours were popular this past week, month, or any other up-to-30-day time frame of your choosing.**

*BuzzFeed*

**To the right of each post title, you'll find statistics related to each particular post.**

*BuzzFeed*

Here you'll find your:

- ★ **Top Referrer**, aka the website or app from where people found your post and opened it up.
- ★ **Total Views**
- ★ **Viral Views**, which, if you remember above, are the views your post

(E.g., <https://web.archive.org/web/20210205221127/https://www.buzzfeed.com/annakopsky/dashboard-dashbird-guide>).

BuzzFeed

Here you'll find your:

- ★ **Top Referrer**, aka the website or app from where people found your post and opened it up.
- ★ **Total Views**
- ★ **Viral Views**, which, if you remember above, are the views your post earned from viewers who found your post on social media or any site *not* on BuzzFeed itself.
- ★ **Social Lift**, which is a fun little metric we use to illustrate the amount of social media attention your list or quiz is getting.

**How is Social Lift calculated, and what does this number mean?**

Anna Kopsky/BuzzFeed

Social Lift is calculated when we **divide the number of viral views by the total number of seed views** on the list or quiz. Then add 1, and there you have it! Your social lift.

Put plainly, your Social Lift describes how many views your post is getting from others sharing it online. So if you have a 1.2X Social Lift, this means that for every 10 people who saw your quiz or list, 2 additional people saw it through sharing.

**Note that you can also click on the post titles within that list to find a dashboard for each specific post! Here's an example of the top post from the list above, by Community Contributor [sarrs24](#).**

BuzzFeed

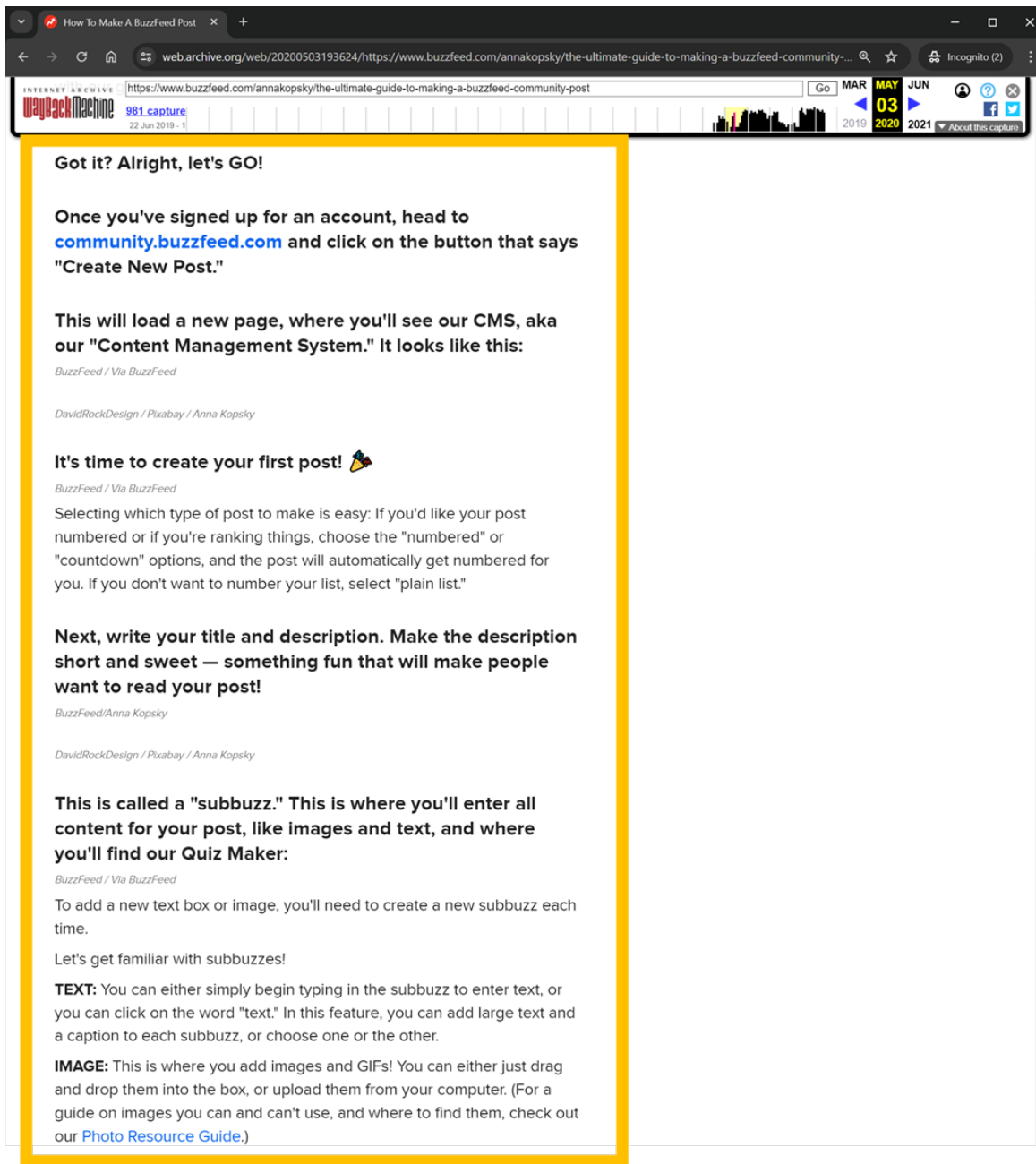
Using the guide above, you can learn about the traffic related to each quiz or list you've created. Cool, right?!

Anna Kopsky/Canva

**Finally, all the way at the bottom of your dashboard page, you'll find a "Viral Traffic Referral Breakdown."**

BuzzFeed

(E.g., <https://web.archive.org/web/20210205221127/https://www.buzzfeed.com/annakopsky/dashboard-dashbird-guide>).



(E.g., <https://web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-post>).

**IMAGE:** This is where you add images and GIFs! You can either just drag and drop them into the box, or upload them from your computer. (For a guide on images you can and can't use, and where to find them, check out our [Photo Resource Guide](#).)

**EMBED:** Click this option to enter embed links (more info on how to embed can be found in our Photo Resource Guide as well!)

**LINK:** This one's pretty self-explanatory. If you want to include a link, highlight the text you'd like to link, and then click "link." A little box will pop up where you can drop your link, and voilà!

**QUIZ:** This button is for making quizzes, obviously! Make sure you check out our [updated Quiz Guide](#) for a step-by-step walkthrough on how to make a great BuzzFeed Quiz.

**Let's break it down.**  
*DavidRockDesign / Pixabay / Anna Kopsky*

**Once you've created a rad title and written a clever description, you can begin decking out your post by filling out your subbuzzes!**  
*BuzzFeed/Anna Kopsky*

You can either begin typing in the box on top to enter text, or you can click on the word "text" in the subbuzz to start.

**You can then bold, italicize, and add links to your text.**  
*BuzzFeed/Anna Kopsky*

Just highlight the text you're looking to edit, and select one of the options in the bottom right-hand corner of the subbuzz: "B" will bold your text, "i" will italicize it, and the chain icon will open up a box where you can drop a link.

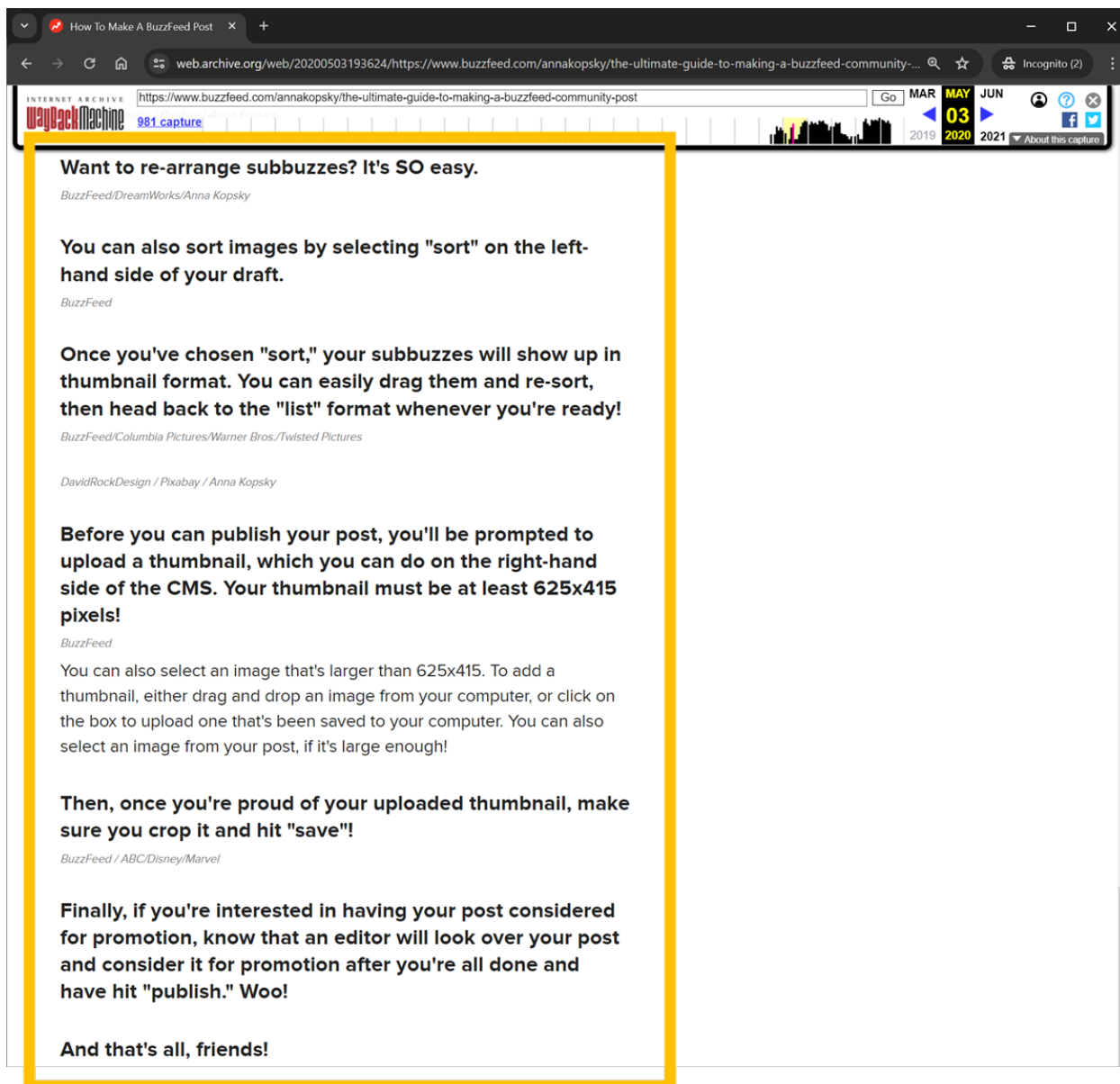
You can also use keyboard shortcuts. Just highlight your text and press "command + b" to bold, or "command + i" to italicize.

*DavidRockDesign / Pixabay / Anna Kopsky*

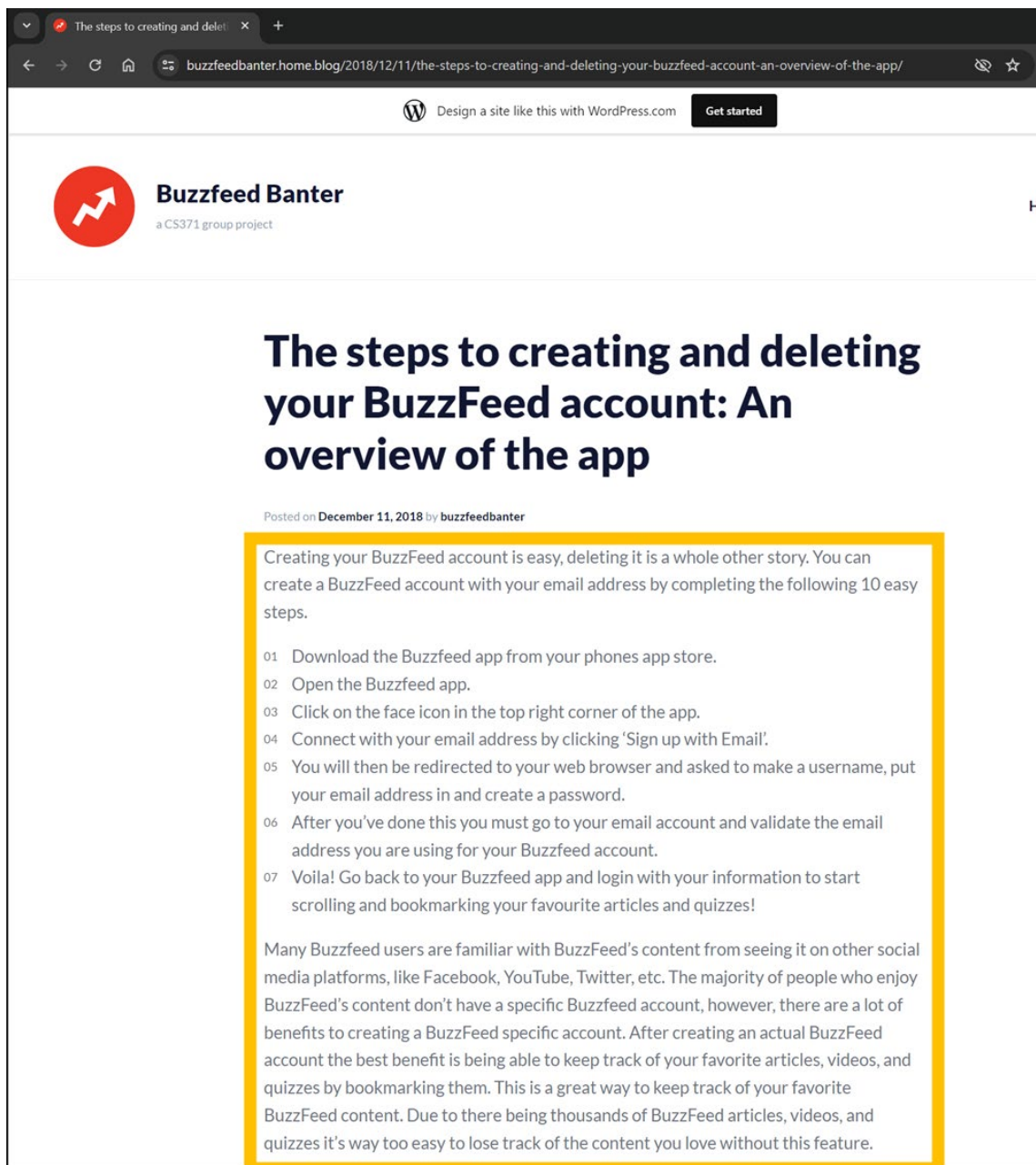
**You can add stills and GIFs to your post to make it extra awesome by clicking the "image" button in your subbuzz or simply by dropping a .jpg or .gif file in the subbuzz.**  
*BuzzFeed / NBC*

**Then, remember to source the image. For the example**

(E.g., <https://web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-post>).



(E.g., <https://web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-post>).



The screenshot shows a web browser window displaying a WordPress blog post. The browser's address bar shows the URL: [buzzfeedbanter.home.blog/2018/12/11/the-steps-to-creating-and-deleting-your-buzzfeed-account-an-overview-of-the-app/](https://buzzfeedbanter.home.blog/2018/12/11/the-steps-to-creating-and-deleting-your-buzzfeed-account-an-overview-of-the-app/). The page header includes the WordPress logo, the text "Design a site like this with WordPress.com", and a "Get started" button. The site's logo is a red circle with a white upward-pointing arrow, and the site name is "Buzzfeed Banter", a CS371 group project. The main heading of the post is "The steps to creating and deleting your BuzzFeed account: An overview of the app". Below the heading, it says "Posted on December 11, 2018 by buzzfeedbanter". The main content is enclosed in a yellow border and contains the following text:

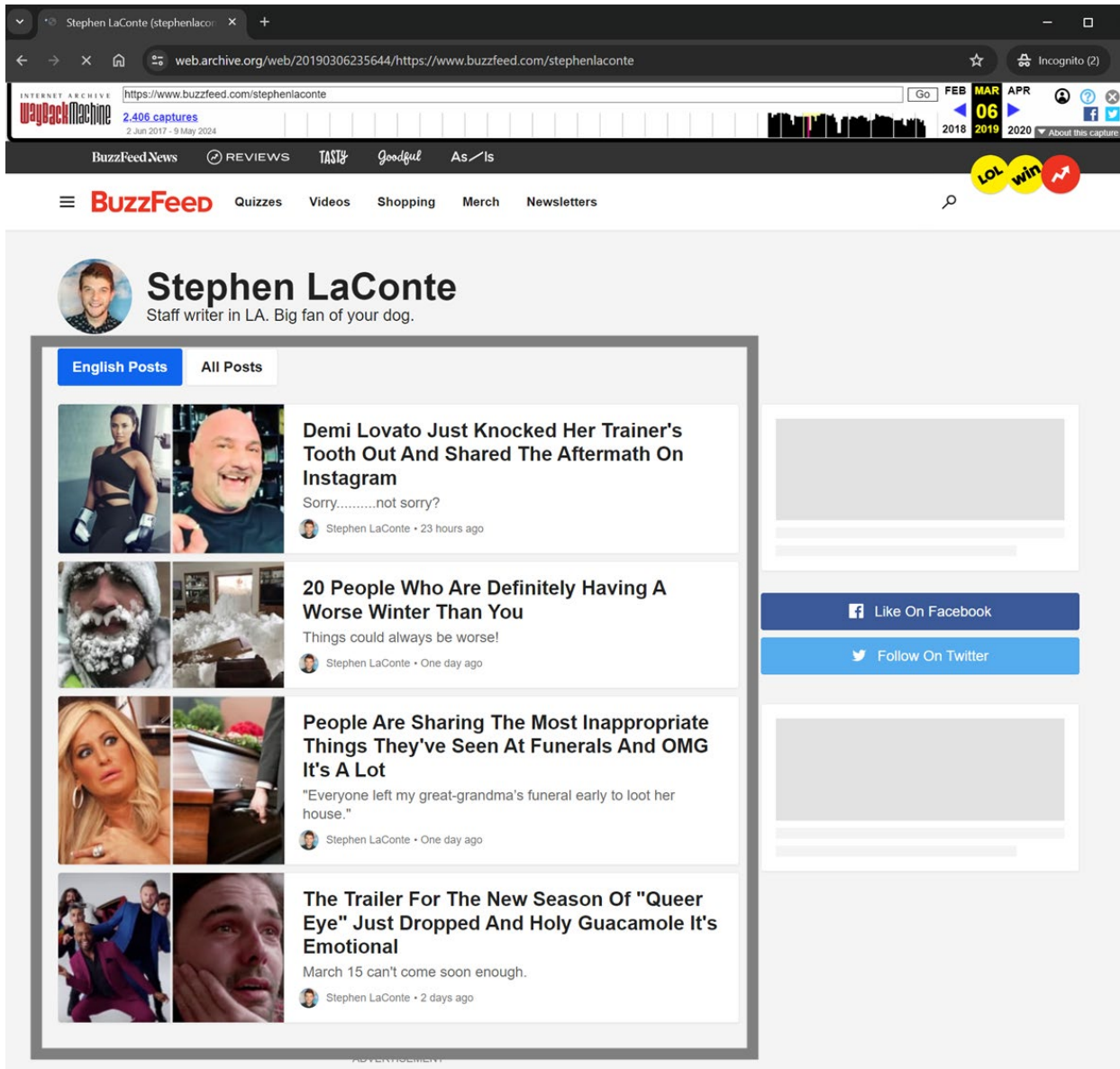
Creating your BuzzFeed account is easy, deleting it is a whole other story. You can create a BuzzFeed account with your email address by completing the following 10 easy steps.

- 01 Download the BuzzFeed app from your phones app store.
- 02 Open the BuzzFeed app.
- 03 Click on the face icon in the top right corner of the app.
- 04 Connect with your email address by clicking 'Sign up with Email'.
- 05 You will then be redirected to your web browser and asked to make a username, put your email address in and create a password.
- 06 After you've done this you must go to your email account and validate the email address you are using for your BuzzFeed account.
- 07 Voila! Go back to your BuzzFeed app and login with your information to start scrolling and bookmarking your favourite articles and quizzes!

Many BuzzFeed users are familiar with BuzzFeed's content from seeing it on other social media platforms, like Facebook, YouTube, Twitter, etc. The majority of people who enjoy BuzzFeed's content don't have a specific BuzzFeed account, however, there are a lot of benefits to creating a BuzzFeed specific account. After creating an actual BuzzFeed account the best benefit is being able to keep track of your favorite articles, videos, and quizzes by bookmarking them. This is a great way to keep track of your favorite BuzzFeed content. Due to there being thousands of BuzzFeed articles, videos, and quizzes it's way too easy to lose track of the content you love without this feature.

(E.g., <https://buzzfeedbanter.home.blog/2018/12/11/the-steps-to-creating-and-deleting-your-buzzfeed-account-an-overview-of-the-app/>).

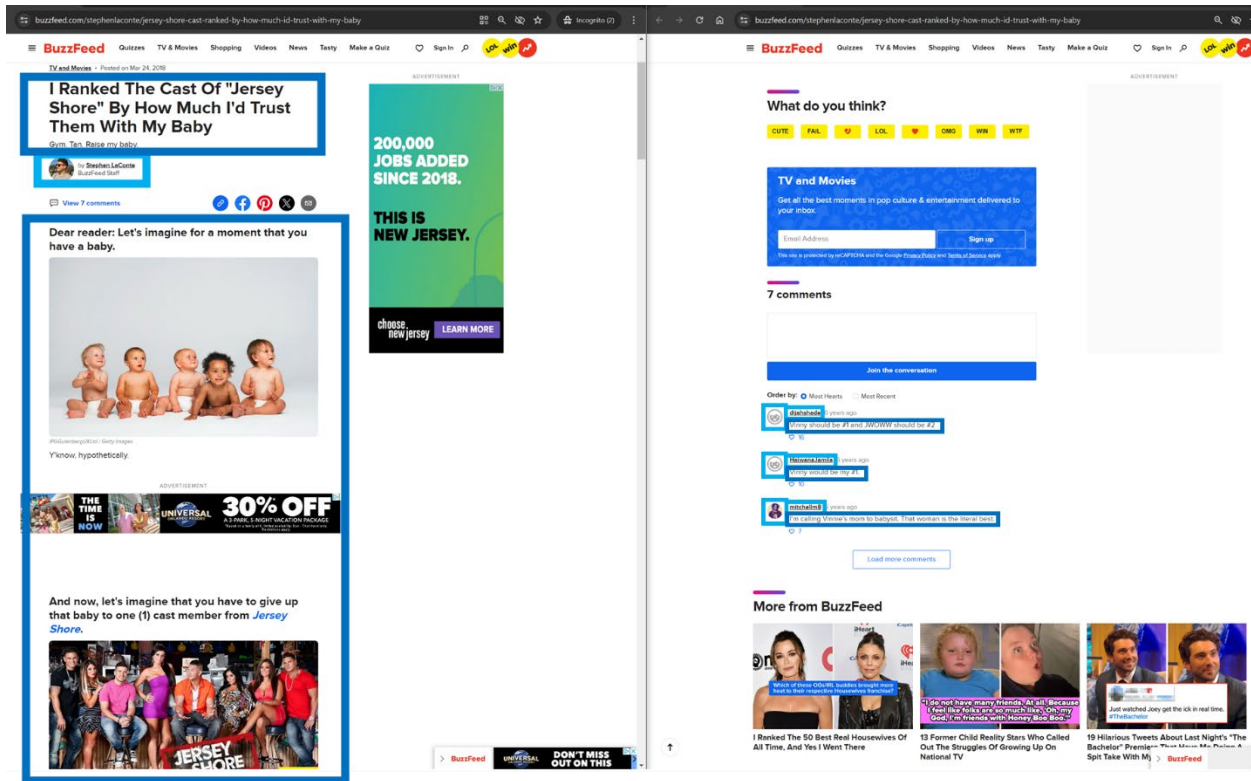




(E.g., <https://web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte>).

24. The electronic media submissions database of the Accused Instrumentality used by BuzzFeed which stores the submissions further stores data identifying the submitter and data indicating content for each electronic media submission (e.g., Article or Comment). As shown below, data identifying the user-submitter includes, e.g., a name and a profile picture. Data

indicating content for each electronic media submission includes photo and/or textual content pertaining to the Article.



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

25. Individual user-submitters can sign up and create user profiles, contributor profiles and post Articles or Comments on The Accused Instrumentality, which are stored on a user database. Such user database is stored in memory available through the Accused Instrumentality, for example as discussed above. User attributes attributed to posts submitted by the user and selected by the user, contained on the user database, may include, e.g., community tags such as Challenge Submission, List, Tumblr Roundup, Trivia Quiz, Friends, and the like, and the like, as well as associated popular topics, as shown for example in the examples below.

Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Save Preview Publish Now

Completely free to join... free to Listing... 5\$ coupon for you if you want to buy any 5\$ SEO Services from me. S masudbcl SEOListly.com/Marektplace

Credit Who created or owns this? Via Where did you find it (URL)?

Description

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

Plain List Numbered Countdown

Thumbnails

Drag and drop or click to upload

Select From Post

Community Tags

After you save your post, add a relevant tag to increase its chances of being promoted by our staff!

Not an initiative post

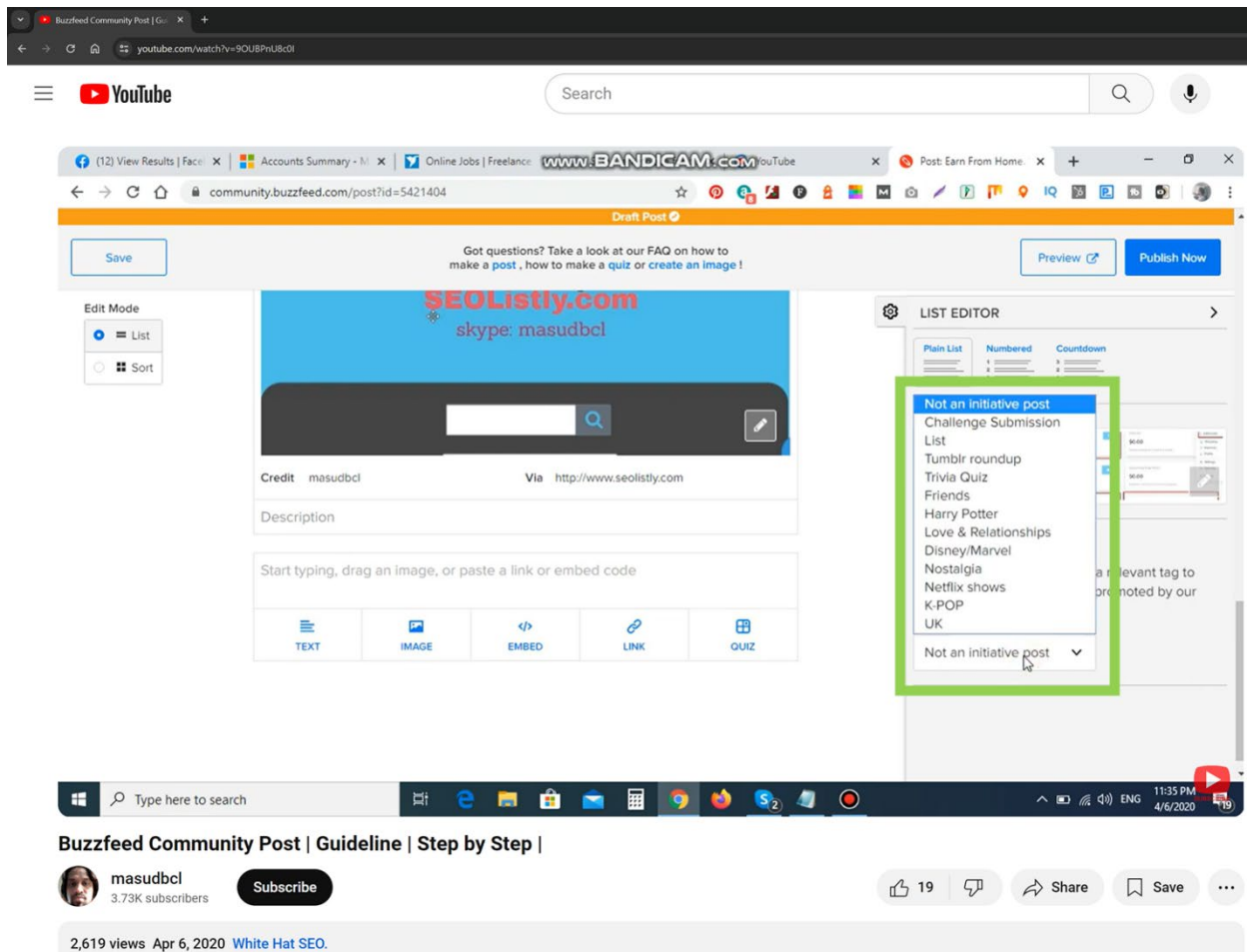
Buzzfeed Community Post | Guideline | Step by Step |

masudbcl 3.73K subscribers Subscribe

19 Share Save

2,619 views Apr 6, 2020 White Hat SEO

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).



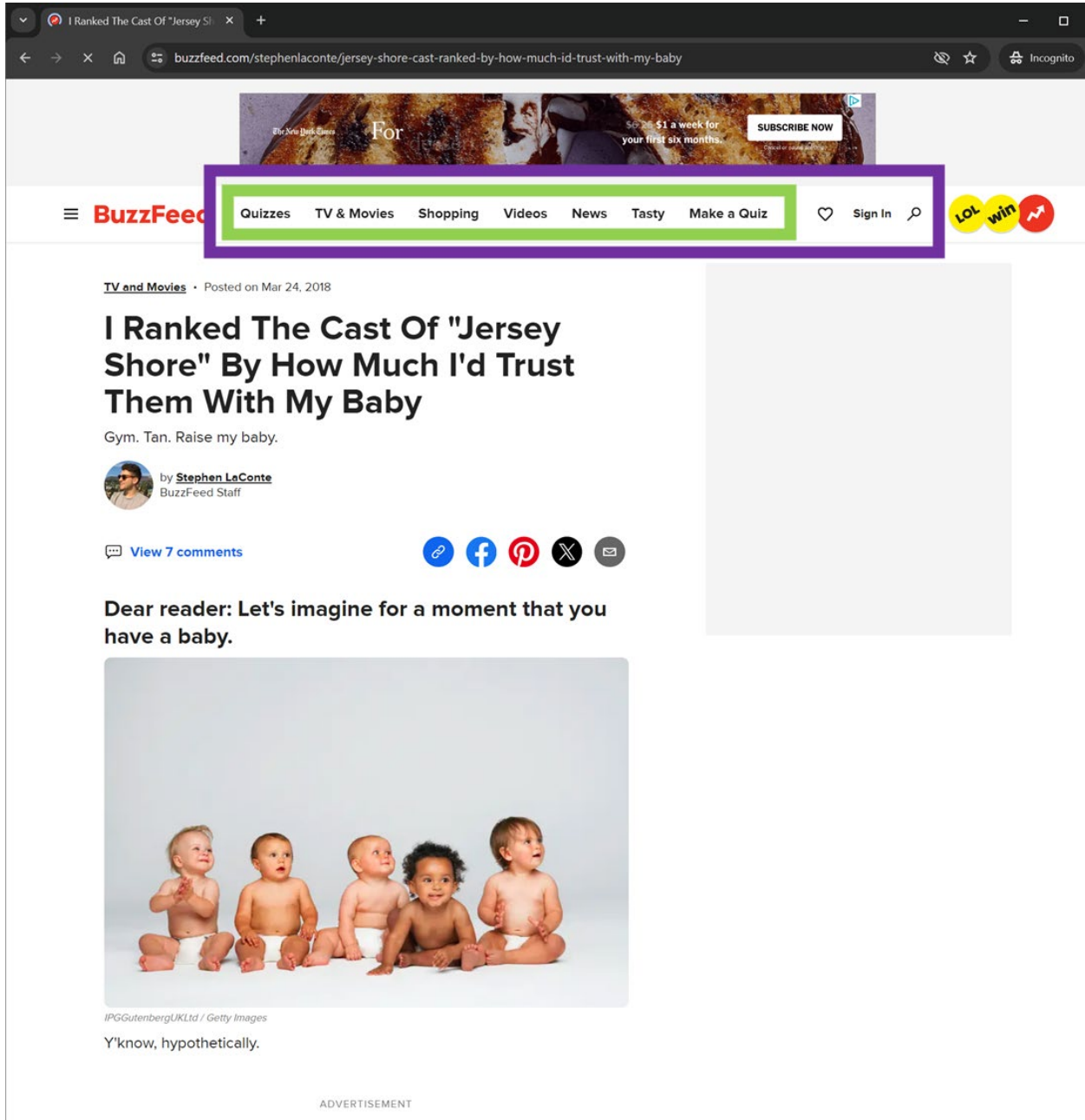
The screenshot displays the YouTube community post draft editor interface. The main content area features a blue banner for 'SEOListly.com' with the text 'skype: masudbcl'. Below the banner is a search bar and a credit line. A 'LIST EDITOR' panel on the right is open, showing a dropdown menu with options like 'Not an initiative post', 'Challenge Submission', 'List', 'Tumblr roundup', 'Trivia Quiz', 'Friends', 'Harry Potter', 'Love & Relationships', 'Disney/Marvel', 'Nostalgia', 'Netflix shows', 'K-POP', and 'UK'. The 'Not an initiative post' option is highlighted with a green box. The bottom of the screen shows the video player interface with the title 'Buzzfeed Community Post | Guideline | Step by Step |', the creator's name 'masudbcl' (3.73K subscribers), and engagement metrics (19 likes, 2 comments, 2,619 views).

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

26. The Accused Instrumentality employs an electronic multimedia creator server subsystem operatively coupled to the electronic media submissions server subsystem, necessarily having one or more data processing apparatus in order to manage content, and an electronic creator multimedia database stored on a non-transitory medium, configured to select and retrieve a plurality of electronic media submissions (e.g., Articles with associated photo content and textual content, as well as user profiles or Comments) from the electronic media submissions database using an electronic content filter located on the electronic multimedia creator server. As can be seen below, such electronic content filter as is used by BuzzFeed is based at least in part on at least one of the one or more user attributes selected by the user (e.g., community tags such as Quizzes,

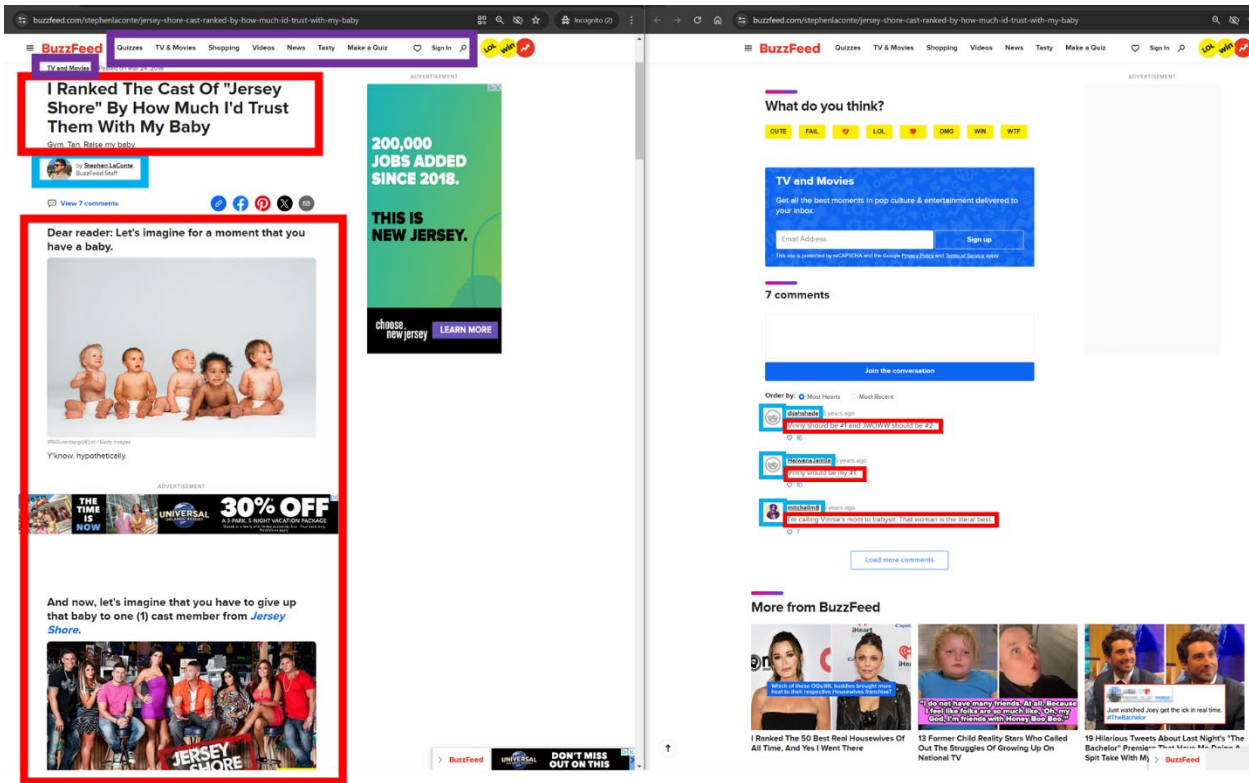
TV & Movies, Shopping, News, and the like), which in turn affect which electronic media submissions, and associated media, appear to the user, as shown and discussed for example below.

Buzzfeed uses function-specific subsystems, for example as discussed below.



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

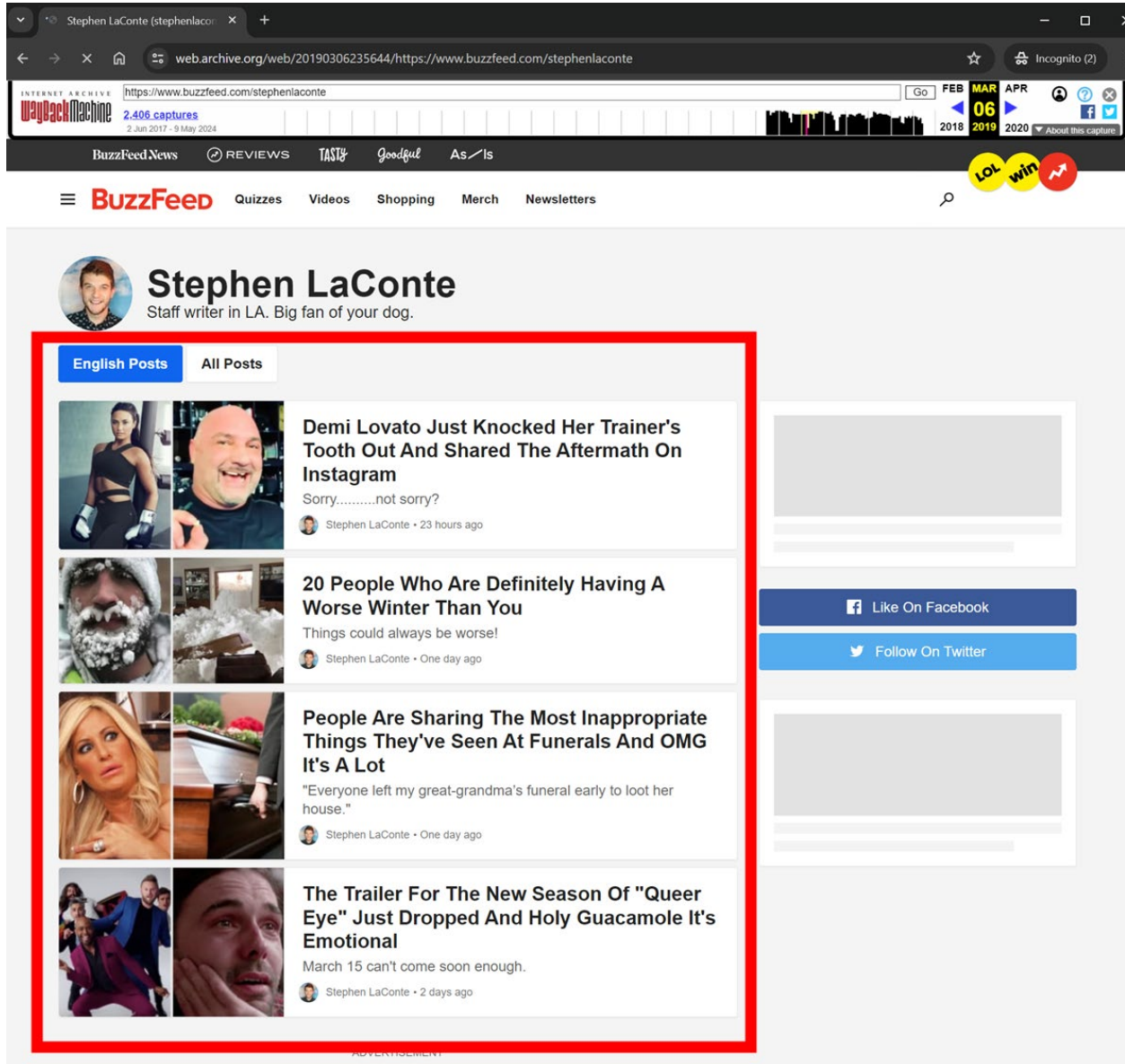
27. Such electronic content filter is used by the Accused Instrumentality to develop multimedia content (e.g., user profiles, Articles, comments and/or various content as discussed above) associated with the user-submitter to be electronically available for viewing on user devices (e.g., devices such as computers and smart phones incorporating browsers or apps) wherein the identification of the submitter (e.g., a name and profile photo) is maintained with each selected and retrieved submission within the multimedia content, for example, as shown below.



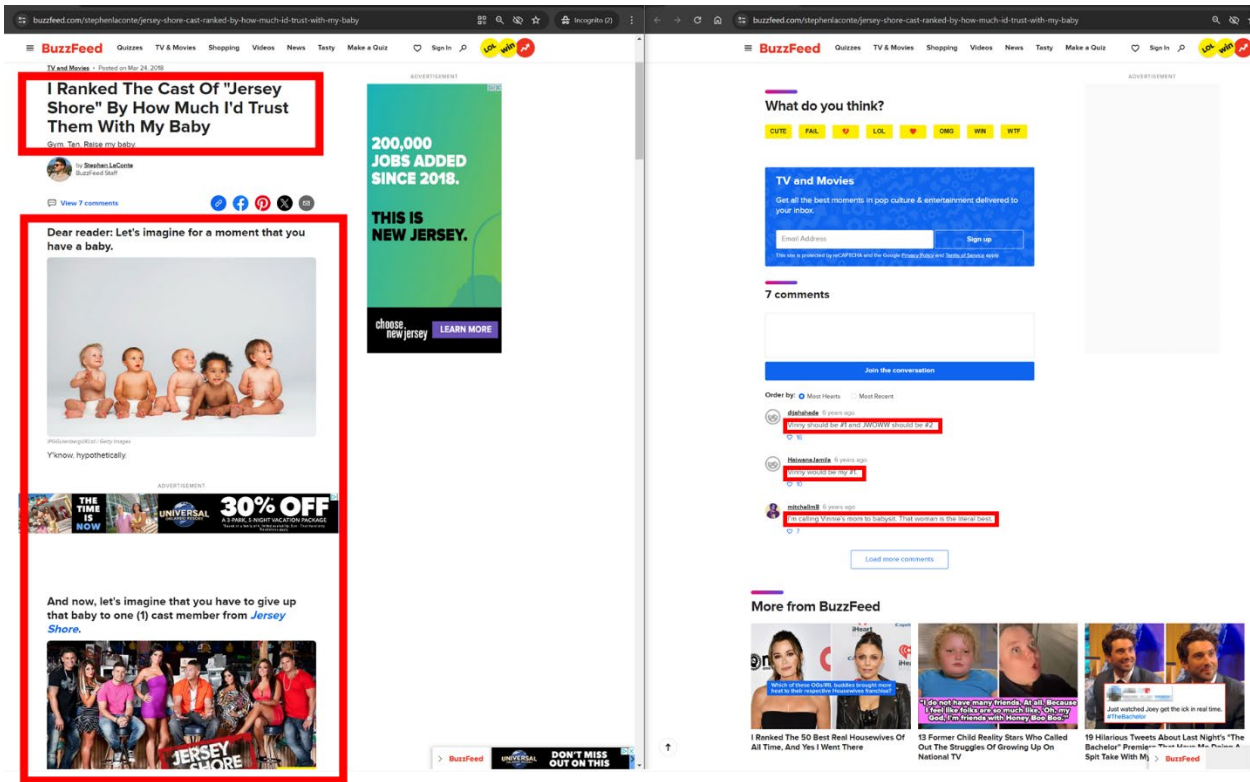
(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-ranked-by-how-much-id-trust-with-my-baby>).

28. The Accused Instrumentality employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus in order to serve multimedia profile and/or post content with associated photo, profile picture, and textual content to users, configured to make the multimedia content

electronically available for viewing on one or more user devices. For example, as shown below, multimedia content associated with the Article or a contributor/user profile is provided on various user devices (e.g., computers or other devices with a web browser or app) in response to a user logging in to the Accused Instrumentality. BuzzFeed uses function-specific subsystems, for example as discussed below.



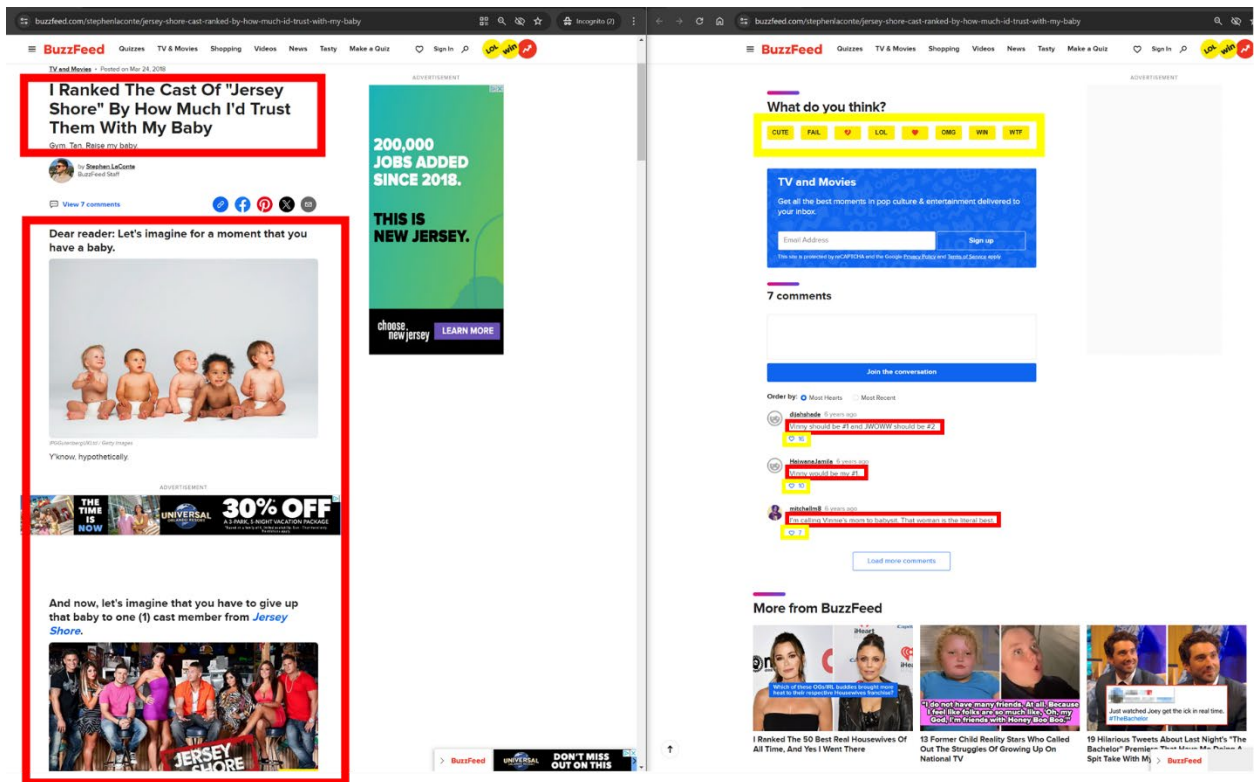
(E.g., <https://web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte>).



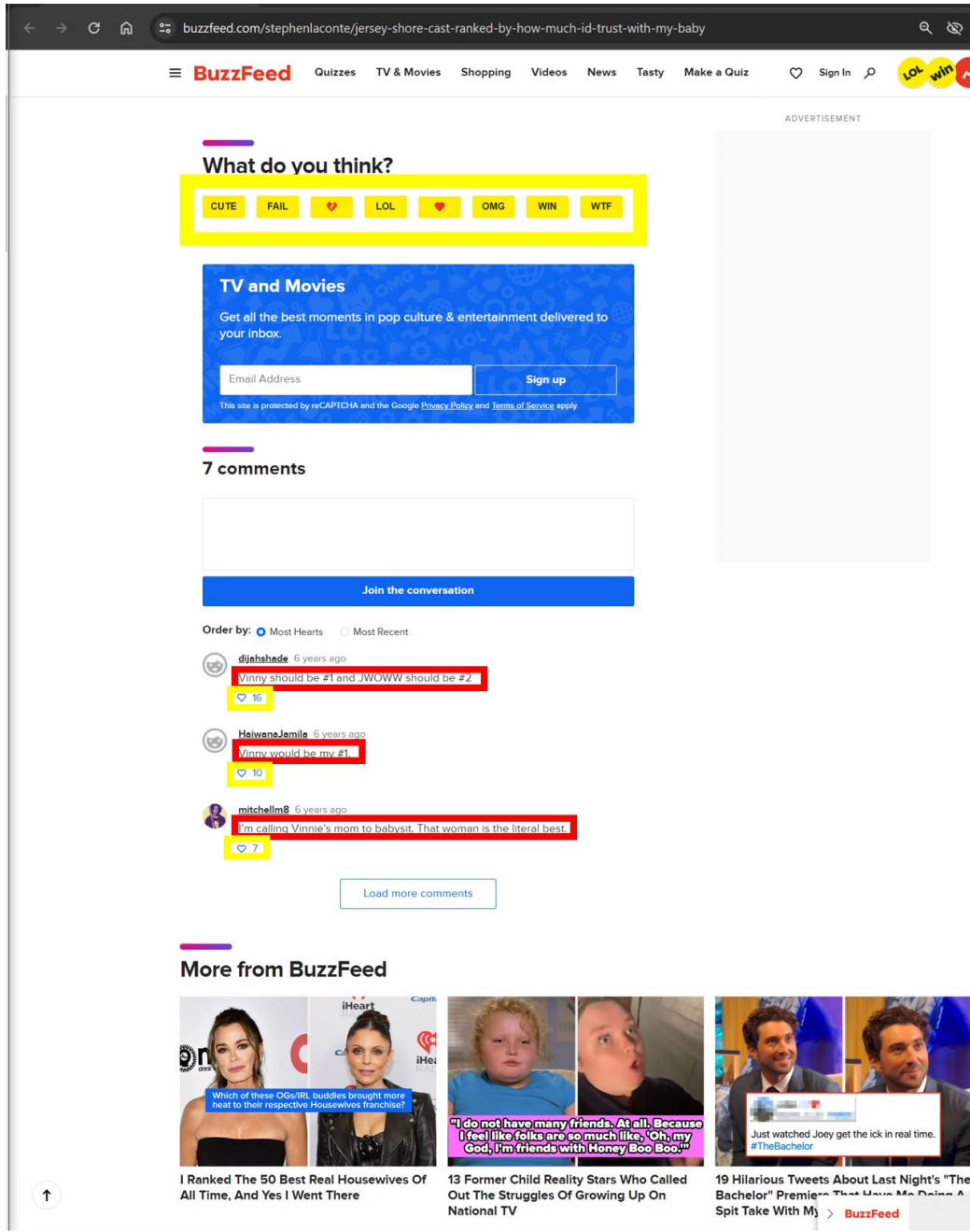
(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

29. The Accused Instrumentality employs an electronic voting subsystem, necessarily having one or more data processing apparatus in order to track voting or electronic rating, configured to enable a user to electronically vote for or rate an electronically available multimedia content (e.g., a multimedia Article provided by a submitter, with accompanying photo and/or textual content), e.g., by the user's choices with respect to a selection of a Like button and textual content in the form of a comment, or by assigning a reaction to an Article such as by characterizing the Article by one or more of CUTE, FAIL, LOL, OMG, WIN, WTF and a heart icon. BuzzFeed uses function-specific subsystems, for example as discussed below.





(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

30. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '480 Patent, *i.e.*, in an amount that by law cannot

be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

31. To the extent marking is required, VCA has complied with all marking requirements.

**IV. COUNT II**  
**(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,477,665)**

32. Plaintiff incorporates the above paragraphs herein by reference.

33. On October 25, 2016, United States Patent No. 9,477,665 (“the ‘665 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘665 Patent is titled “Revenue-Generating Electronic Multi-Media Exchange and Process of Operating Same.” A true and correct copy of the ‘665 Patent is attached hereto as Exhibit B and incorporated herein by reference.

34. VCA is the assignee of all right, title, and interest in the ‘665 Patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘665 Patent. Accordingly, VCA possesses the exclusive right and standing to prosecute the present action for infringement of the ‘665 Patent by Defendant.

35. The application leading to the ‘665 patent was filed November 16, 2012, which was a continuation of application no. 11/978,781, which issued as United States Patent No. 8,340,994, which was a continuation of application no. 09/565,438 which issued as United States Patent No. 7,308,413. (Ex. B at cover). The ‘665 patent was first assigned to Virtual Creative Artists, LLC. (*Id.*).

36. The ‘665 Patent shares the identical specification as the ‘480 patent and therefore VCA incorporates the background and discussion of the invention in Paragraphs 11-18. Furthermore claim 1 involves a system for generating multimedia content. The claim requires,

among other things, electronically generating a multimedia file from the retrieved electronic media Submissions in accordance with a selected digital format, wherein the identification of the submitter is maintained with each retrieved submission within the multimedia file. The claim requires electronically transmitting the multimedia file to a plurality of publicly accessible web servers to be electronically available for viewing on one or more user devices over a public network via a web-browser and. This allows electronically transmitting data indicating votes or rating of multimedia content in a much quicker and easier fashion based on specific user criteria. There is nothing abstract about this very particular, unconventional, and non-routine system for the generation of multimedia content as specifically claimed and there is no risk of preempting creating and distribution contention generally, or even within the context of the Internet.

37. The invention is a highly technical electronic process that cannot be achieved with the human mind and is instead rooted in computer technology, including the steps of:

- “electronically retrieving a plurality of electronic media submissions,”
- “electronically generating a multimedia file from the retrieved electronic media submissions in accordance with a selected digital format,”
- “electronically transmitting the multimedia file to a plurality of publicly accessible web servers to be electronically available for viewing on one or more user devices over a public network via a web-browser,” and
- “providing a web-based graphical user interface that enables a user to electronically transmit data indicating a vote or rating for an electronically available multimedia content or an electronic media Submission within a respective electronically available multimedia content.”

38. Each of these subsystems are configured in a very specific (and not generic, unconventional and non-routine manner to offer the novel and non-obvious approach claimed invention. For example, claim 1 requires an “electronic media submissions database,” which is a subsystem that receives media submissions from Internet users. This is not a generic database but rather a scalable database that must be able to receive, store, and manage multiple petabytes of

multimedia data received from users all over the world. This is one of the many specialized databased required in the claim. In fact, the specification discloses the use of a sophisticated database management system known in the art at the time that was capable of handling data at this level, Oracle7. This type of database management system cannot operate on a generic computing system but rather requires specialized hardware and software.

39. The claim also provides details to explain how each step operates. For example, the claim requires “electronically retrieving a plurality of electronic media submissions from an electronic media submissions database using an electronic content filter located on one or more data processing apparatus.” Further, “the electronic media submissions database” in this step is further required to “store[] [1] data identifying the submitter and [2] data indicating content for each electronic media submission.” The step further requires and “electronic content filter.” The “filter” also includes a very specific algorithm of “being based at least in part on at least one of the one or more user attributes.”

40. The claims also require an “electronically generating a multimedia file from the retrieved electronic media submissions in accordance with a selected digital format.” Manipulation of multimedia data in accordance with a selected digital format is far from generic and was not routine or conventional at the time of the invention. Further, this step requires that the “electronic media submissions database” “stores data identifying the submitter” and the “the identification of the submitter is maintained with each retrieved submission within the multimedia file.”

41. The claims also require “providing a web-based graphical user interface that enables a user to electronically transmit data indicating a vote or rating for an electronically available multimedia content or an electronic media Submission within a respective electronically available multimedia content,” which is a well-defined, specific, and unconventional feature. By

including this additional voting/rating feature, the claims avoid any risk of preempting the creation and distribution of content.

42. The claim also inventive concepts. For example, the claim requires that the filtering tool be at a specific location, remote from the end-users, with customizable filtering features specific to each end user. The "electronic content filter" is located at the server, remote from the end user, and customizable based on user attributes. The "electron voting" step at the time of the invention was also novel, inventive, and added sufficient inventive contributions to avoid a risk of preempting the creation and distribution of media content. It is clearly possible to create and distribute media content without ever having to include a "voting" subsystem on what components should be included in such media content.

43. These arguments overcame a patent eligibility rejection under 35 U.S.C. §101 of the claim at issue during the prosecution of the '665 patent before the United States Patent and Trademark Office.

44. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claim 1 of the '665 Patent in New York, and elsewhere in the United States, by employing a computer-based system using <https://www.buzzfeed.com/> ("Accused Instrumentality") (*e.g.*, <https://www.buzzfeed.com/>).

45. Buzzfeed uses a computer-based system for its Accused Instrumentality to enable user-submitters to create profiles and publish multimedia content pertaining to pop-culture, current topics, US domestic and world news (hereinafter referred to as "Articles"). Articles may also include multimedia content pertaining to "listicles" (articles having a list format) and/or quizzes, inviting participation and comment from other active users. In May 2013, Buzzfeed launched the "Community," enabling users to submit multimedia content in the form of Articles (including

listicles and/or quizzes). Multimedia content pertaining to a user's profile includes image and textual content *e.g.*, a profile picture, a biography and affiliated links. Multimedia content pertaining to an Article includes image, video and textual content, including interactive links (such as quizzes). The Articles and associated multimedia content may be shown to other users based on, *inter alia*, user attributes and/or Article attributes. The Accused Instrumentality employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus in order to serve multimedia profile and/or post content with associated photo, profile picture, and textual content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. For example, as shown below, multimedia content associated with the Article or a contributor/user profile is provided on various user devices (*e.g.*, computers or other devices with a web browser or app) in response to a user logging in to the Accused Instrumentality. BuzzFeed uses function-specific subsystems, for example as discussed below. BuzzFeed, during the relevant time period, took advantage of multiple cloud server providers for the Accused Instrumentality, as discussed above, as well as scalability within its cloud server providers, employing separate server subsystems for all its meaningfully different functions. BuzzFeed uses, and has used during the relevant time period, numerous different networks and providers for, *inter alia*, content management systems, web servers, web hosting, data centers, proxy certificates, SSL certificates, traffic analysis, advertising, and tagging, thereby using separate server subsystems for all its meaningfully different functions, such as those indicated below.

Stephen LaConte (stephenlacon...)

web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte

INTERNET ARCHIVE  
Wayback Machine  
2,406 captures  
2 Jun 2017 - 9 May 2024

BuzzFeedNews REVIEWS TASTE Goodful As/Is

BuzzFeed Quizzes Videos Shopping Merch Newsletters

LOL win

**Stephen LaConte**  
Staff writer in LA. Big fan of your dog.

English Posts All Posts

**Demi Lovato Just Knocked Her Trainer's Tooth Out And Shared The Aftermath On Instagram**  
Sorry.....not sorry?  
Stephen LaConte • 23 hours ago

**20 People Who Are Definitely Having A Worse Winter Than You**  
Things could always be worse!  
Stephen LaConte • One day ago

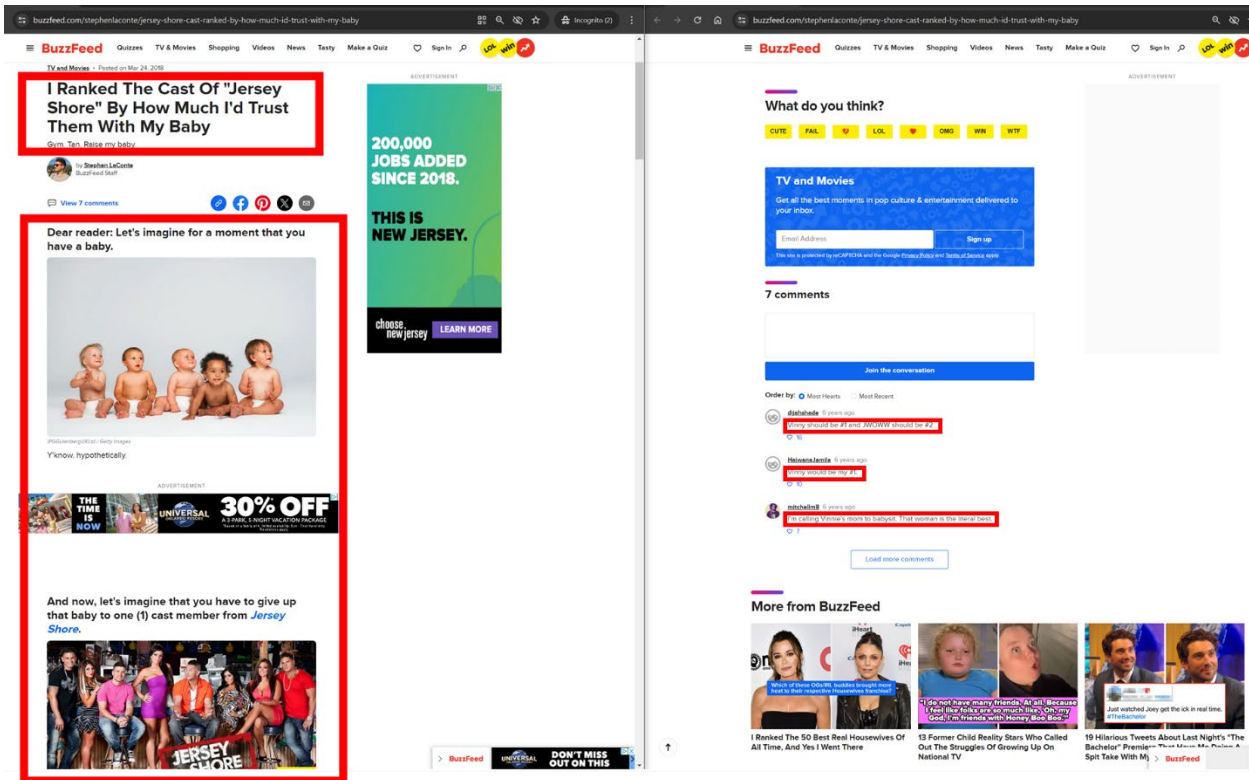
**People Are Sharing The Most Inappropriate Things They've Seen At Funerals And OMG It's A Lot**  
"Everyone left my great-grandma's funeral early to loot her house."  
Stephen LaConte • One day ago

**The Trailer For The New Season Of "Queer Eye" Just Dropped And Holy Guacamole It's Emotional**  
March 15 can't come soon enough.  
Stephen LaConte • 2 days ago

Like On Facebook  
Follow On Twitter

(E.g., <https://web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte>).





(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

46. The Accused Instrumentality electronically retrieves a plurality of electronic media submissions from an electronic media submissions database on a non-transitory medium, for example multimedia content pertaining to posting an Article or comment, or a personalized user profile on the Accused Instrumentality, as well as multimedia content pertaining to Articles and user profiles. Individual user-submitters can sign up and create user profiles, contributor profiles and post Articles or Comments on the Accused Instrumentality, which are stored on a user database. Such user database is stored in memory available through the Accused Instrumentality, for example as discussed above. User attributes attributed to posts submitted by the user and selected by the user, contained on the user database, may include, e.g., community tags such as Challenge Submission, List, Tumblr Roundup, Trivia Quiz, Friends, and the like, and the like, as

well as associated popular topics, as shown for example in the examples below. The Accused Instrumentality's retrieval of electronic media with associated photo content and textual content associated with the Articles from the electronic media submissions database uses an electronic content filter located on the one or more data processing apparatus. As can be seen below, such electronic content filter as is used by BuzzFeed is based at least in part on at least one of the one or more user attributes selected by the user (e.g., community tags such as Quizzes, TV & Movies, Shopping, News, and the like), which in turn affect which electronic media submissions, and associated media, appear to the user, as shown and discussed for example below. BuzzFeed uses function-specific subsystems, for example as discussed below.

Buzzfeed Community Post | Guideline | Step by Step |

masudbel  
3.73K subscribers

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Save Preview Publish Now

Edit Mode  
List Sort

SEOListly.com  
skype: masudbcl

Credit masudbcl Via http://www.seolistly.com

Description

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

- Not an initiative post
- Challenge Submission
- List
- Tumblr roundup
- Trivia Quiz
- Friends
- Harry Potter
- Love & Relationships
- Disney/Marvel
- Nostalgia
- Netflix shows
- K-POP
- UK

Not an initiative post

masudbcl  
3.73K subscribers

Subscribe

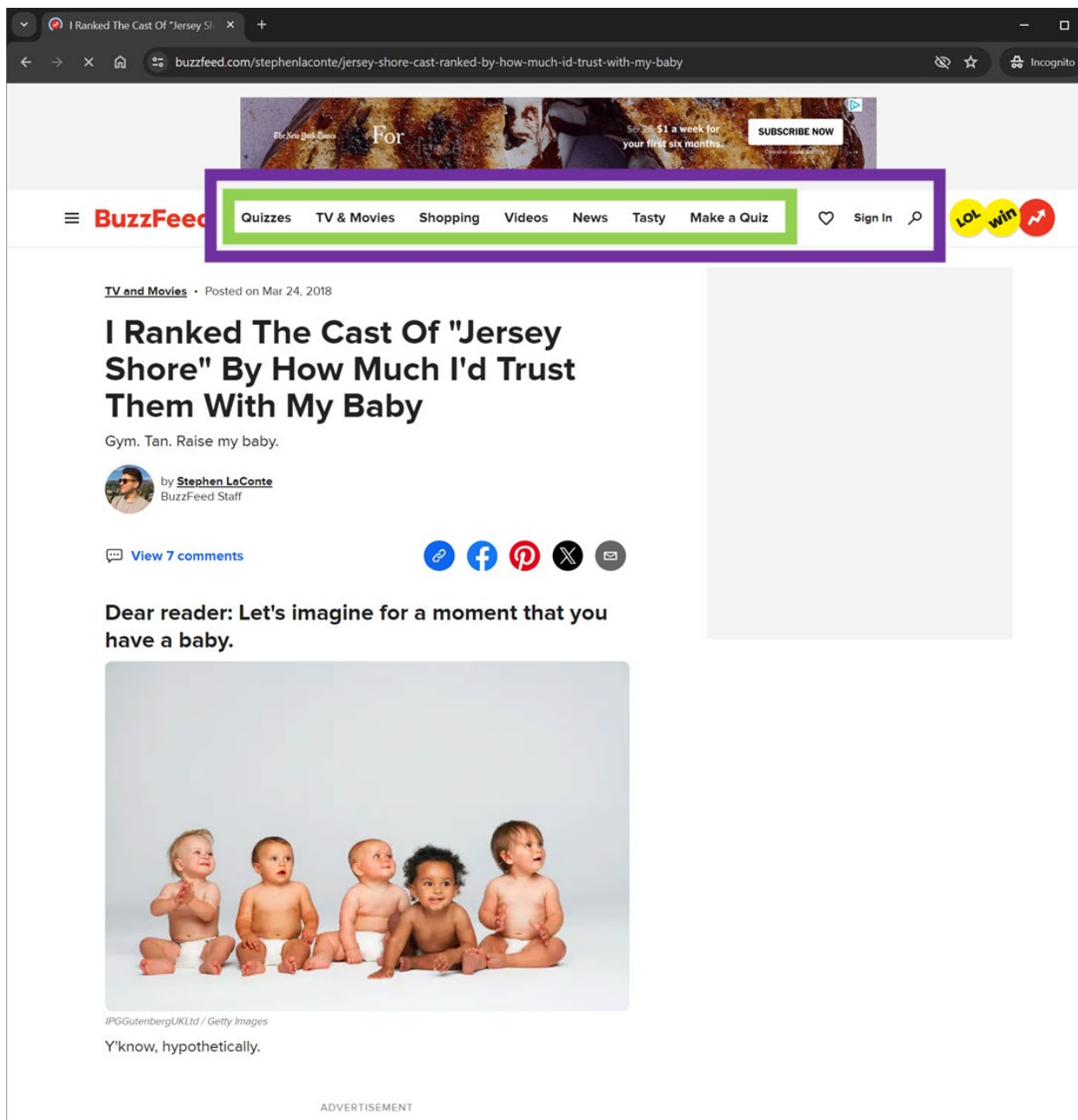
19

Share

Save

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

47. The Accused Instrumentality includes an electronic media submissions server subsystem, having one or more data processing apparatus and an electronic media submissions database stored on a non-transitory medium in order to process and store received submissions

from a plurality of user-submitters, for example content pertaining to their respective electronic media submission (*e.g.*, Article or comment on an Article) on the Accused Instrumentality, as well as multimedia content (*e.g.*, photo and/or textual content) to be displayed on a main page or within the Article, as discussed and shown for example in connection with the above discussion. Individual users may create a profile and submit content pertaining to their user profile and/or Article or comment on an Article. The submissions are provided to the Accused Instrumentality via a submissions electronic interface, *e.g.*, a web-based content portal, accessible for example by logging in and selecting an option to upload such content or import content, configured to receive such electronic media, from a plurality of submitters (*e.g.*, user-submitters) over a public network (*e.g.*, the Internet) and stored, via an uploading process, in said electronic media Listings database for use in distribution to other users of the Accused Instrumentality.

The screenshot displays a YouTube video player with a yellow border around the video content. The video content is a BuzzFeed Community post titled "Community Corner". The text in the video reads: "Community Corner Update: April 3, 2020. Please note that right now we are not accepting any Coronavirus content on the BuzzFeed Community. Creating any content related to the virus will be removed. You're more than welcome to refer to our User Agreement for more information. With that being said... welcome again to your Community Corner! Tiger King content continues to reign supreme — our current top Community quiz, created by user fjweschler, has garnered over 4 million views in the last week and a half!". Below the video, the user "masudbcl" is shown with 3.73K subscribers and 19 likes. The video title is "Buzzfeed Community Post | Guideline | Step by Step |" and it has 2,619 views as of April 6, 2020.

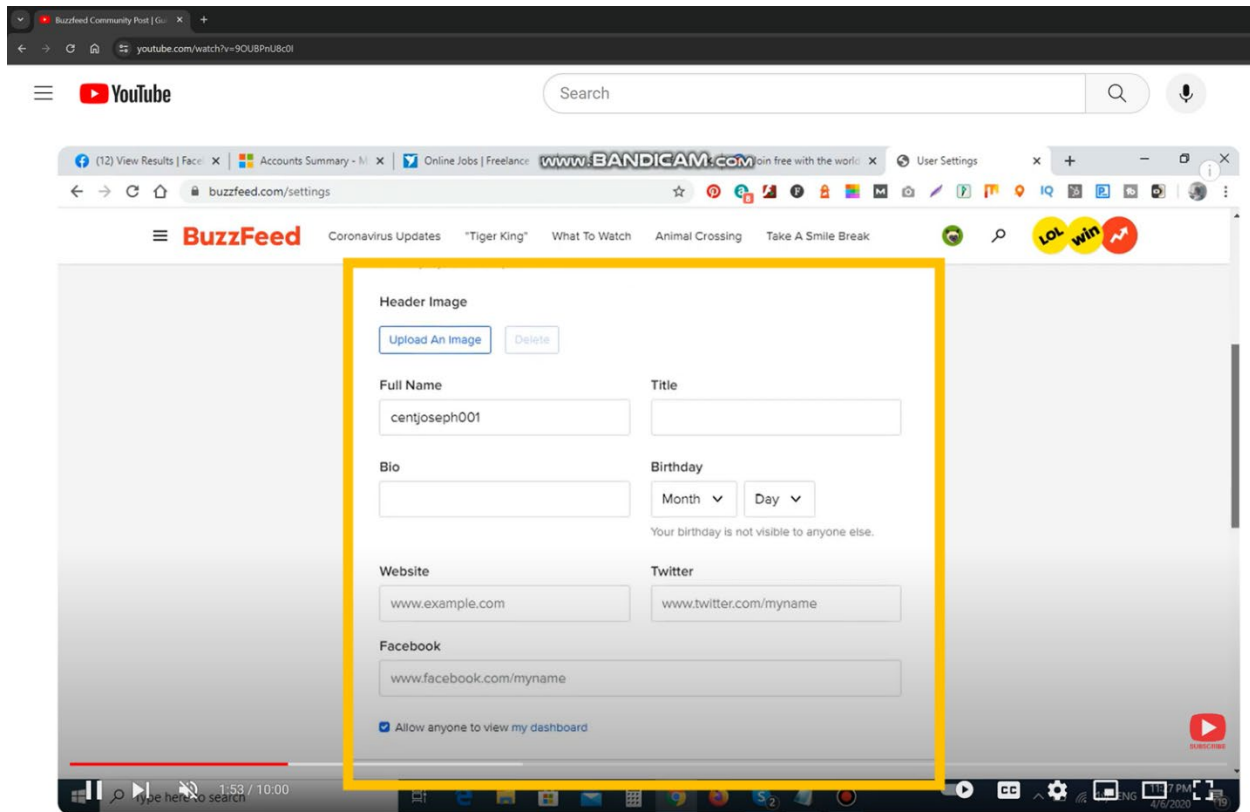
(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

The screenshot shows a YouTube video player with a video titled "Buzzfeed Community Post | Guideline | Step by Step |" by the channel "masudbcl" (3.7K subscribers). The video has 2,619 views and was posted on April 6, 2020. The video content is a screen recording of the BuzzFeed website's profile settings page. A yellow rectangular box highlights the "Profile Information" section, which includes:

- Profile Photo and Username:** A circular profile picture of a cat's face. Buttons for "Upload New Photo" and "Delete Photo" are visible.
- Username:** The username "centjoseph001" is displayed in a text input field. Below it, a note reads: "Choose wisely! You can only change this once, and only if you haven't posted."
- Header Image:** Buttons for "Upload An Image" and "Delete" are visible.
- Full Name:** A text input field is present but empty.
- Title:** A text input field is present but empty.

At the bottom of the video player, there are interaction buttons for "Like" (19), "Comment", "Share", "Save", and a menu icon.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).



Buzzfeed Community Post | Guideline | Step by Step |



masudbcl  
3.73K subscribers

Subscribe

19



Share

Save



2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).



The screenshot shows a YouTube video player with the following content:

- Channel:** Md Masudul Hasan (3.73K subscribers)
- Video Title:** BuzzFeed Community Post | Guideline | Step by Step |
- Views:** 2,619 views (Apr 6, 2020)
- Video Content:**
  - Profile picture and name: Md Masudul Hasan (+100 points)
  - Bio: Full time freelancer and outsourcing worker for the last 09 years. Affiliate programmer and Blogger.
  - Message: **Welcome to the BuzzFeed Community!** BuzzFeed Community is a hub for BuzzFeeders to create awesome quizzes and posts that people love.
  - Buttons: **Create your first post!** (blue), Or browse what others are doing (grey)
  - Trophy: **seolistly's Trophies (1)** - Latest Trophy: **You Exist!**
  - Footer: **Don't know where to start?** Learn how to make an awesome post with these guides made by our BuzzFeed Staff.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

YouTube

community.buzzfeed.com/post

**BuzzFeed Community**

Draft Post

Save

Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Preview Publish Now

Edit Mode

- List
- Sort

Earn From Home. Work From Home.

Join free with the world best online marketplace. Completely free method to earn from online.

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

Plain List Numbered Countdown

Thumbnails

Drag and drop or click to upload

Select From Post

Community Tags

After you save your post, add a relevant tag to increase its chances of being promoted by our staff!

Save your draft first, then we can assign it to a challenge.

Type here to search

11:30 PM 4/6/2020

**Buzzfeed Community Post | Guideline | Step by Step |**

masudbcl  
3.73K subscribers  
Subscribe

19

Share Save

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Save Preview Publish Now

Edit Mode

- List
- Sort

Completely free to join... free to Listing... 5\$ coupon for you if you want to buy any 5\$ SEO Services from me. masudbcl SEOListly.com/Marektplace

Credit Who created or owns this? Via Where did you find it (URL?)

Description

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

- Plain List
- Numbered
- Countdown

Thumbnails

Drag and drop or click to upload

Select From Post

Community Tags

After you save your post, add a relevant tag to increase its chances of being promoted by our staff!

Not an initiative post

masudbcl 3.73K subscribers Subscribe

19 Comments Share Save

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

Got questions? Take a look at our FAQ on how to make a post, how to make a quiz or create an image!

Save Preview Publish Now

Edit Mode  
List  
Sort

SEOListly.com  
skype: masudbcl

Credit masudbcl Via http://www.seolistly.com

Description

Start typing, drag an image, or paste a link or embed code

TEXT IMAGE EMBED LINK QUIZ

LIST EDITOR

Plain List Numbered Countdown

Not an Initiative post  
Challenge Submission  
List  
Tumblr roundup  
Trivia Quiz  
Friends  
Harry Potter  
Love & Relationships  
Disney/Marvel  
Nostalgia  
Netflix shows  
K-POP  
UK

Not an Initiative post

masudbcl  
3.73K subscribers  
Subscribe

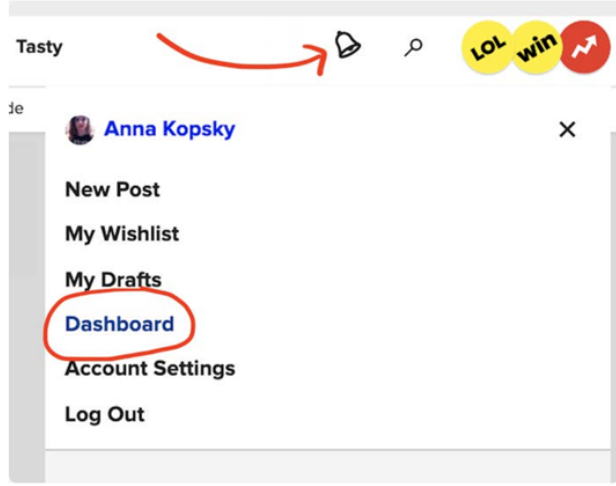
19 likes

Share Save

2,619 views Apr 6, 2020 White Hat SEO.

(E.g., <https://www.youtube.com/watch?v=9OUBPnU8c0I>).

To find your personal dashboard, make sure you're logged in on a computer, then click the bell on the upper-right-hand side of BuzzFeed. Next, click "Dashboard."



The screenshot shows the BuzzFeed user interface. At the top, there is a navigation bar with the word "Tasty" on the left and a bell icon, a magnifying glass, and two circular buttons labeled "LOL" and "win" on the right. A red arrow points from the text above to the bell icon. Below the navigation bar is a user profile for "Anna Kopsky" with a close button (X). A dropdown menu is open, listing several options: "New Post", "My Wishlist", "My Drafts", "Dashboard" (which is circled in red), "Account Settings", and "Log Out".

It's important to note that *everyone's* dashboard numbers will look different because yours shows data specifically from the posts you've created.

Here's an *example* of how a dashboard might look, and we'll use this specific chart to break down how it all works.

Please note that your dashboard page will not display a chart unless you've created at least one post!

First, you'll want to set the region and time frame from which you'd like to view data. You can do this on the upper-right-hand side of your dashboard page.

(E.g., <https://web.archive.org/web/20210205221127/https://www.buzzfeed.com/annakopsky/dashboard-dashbird-guide>).

**The chart displayed on your dashboard is a visual representation of the number of viral and seed views your posts have earned.**

*BuzzFeed*

Both the right and left sides of this chart display the number of views from lowest at the bottom to highest at the top. Along the bottom of the chart are dates showing when there were spikes or dips in views.

**Hovering over any part of this chart will display view numbers from a specific date, including seed and viral views.**

*BuzzFeed*

**And if you're not a chart person, the right-hand side of your Dashboard displays the exact number of views your posts have earned over the time frame you set. Hovering over the question marks below each number will break down from where these views came.**

*BuzzFeed*

**After admiring your chart, scroll down a bit to find a list of your top posts by views. You can sort these by date or by views. Remember, you can change the time frame at the top of the dashboard page to see which posts of yours were popular this past week, month, or any other up-to-30-day time frame of your choosing.**

*BuzzFeed*

**To the right of each post title, you'll find statistics related to each particular post.**

*BuzzFeed*

Here you'll find your:

- ★ **Top Referrer**, aka the website or app from where people found your post and opened it up.
- ★ **Total Views**
- ★ **Viral Views**, which, if you remember above, are the views your post

(E.g., <https://web.archive.org/web/20210205221127/https://www.buzzfeed.com/annakopsky/dashboard-dashbird-guide>).

web.archive.org/web/20210205221127/https://www.buzzfeed.com/annakopsky/dashboard-dashbird-guide

Wayback Machine 20 captures 5 Feb 2021 - 12

Go JAN FEB MAR 05 2021 2022 About this capture

*BuzzFeed*

Here you'll find your:

- ★ **Top Referrer**, aka the website or app from where people found your post and opened it up.
- ★ **Total Views**
- ★ **Viral Views**, which, if you remember above, are the views your post earned from viewers who found your post on social media or any site *not* on BuzzFeed itself.
- ★ **Social Lift**, which is a fun little metriic we use to illustrate the amount of social media attention your list or quiz is getting.

**How is Social Lift calculated, and what does this number mean?**

*Anna Kopsky/BuzzFeed*

Social Lift is calculated when we **divide the number of viral views by the total number of seed views** on the list or quiz. Then add 1, and there you have it! Your social lift.

Put plainly, your Social Lift describes how many views your post is getting from others sharing it online. So if you have a 1.2X Social Lift, this means that for every 10 people who saw your quiz or list, 2 additional people saw it through sharing.

**Note that you can also click on the post titles within that list to find a dashboard for each specific post! Here's an example of the top post from the list above, by Community Contributor [sarrs24](#).**

*BuzzFeed*

Using the guide above, you can learn about the traffic related to each quiz or list you've created. Cool, right?!

*Anna Kopsky/Canva*

**Finally, all the way at the bottom of your dashboard page, you'll find a "Viral Traffic Referral Breakdown."**

*BuzzFeed*

(E.g., <https://web.archive.org/web/20210205221127/https://www.buzzfeed.com/annakopsky/dashboard-dashbird-guide>).

How To Make A BuzzFeed Post

web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-... Incognito (2)

INTERNET ARCHIVE Wayback Machine 981 capture 22 Jun 2019 - 1

**Got it? Alright, let's GO!**

Once you've signed up for an account, head to [community.buzzfeed.com](https://community.buzzfeed.com) and click on the button that says "Create New Post."

This will load a new page, where you'll see our CMS, aka our "Content Management System." It looks like this:

*BuzzFeed / Via BuzzFeed*

*DavidRockDesign / Pixabay / Anna Kopsky*

**It's time to create your first post!** 🎉

*BuzzFeed / Via BuzzFeed*

Selecting which type of post to make is easy: If you'd like your post numbered or if you're ranking things, choose the "numbered" or "countdown" options, and the post will automatically get numbered for you. If you don't want to number your list, select "plain list."

**Next, write your title and description. Make the description short and sweet — something fun that will make people want to read your post!**

*BuzzFeed/Anna Kopsky*

*DavidRockDesign / Pixabay / Anna Kopsky*

**This is called a "subbuzz." This is where you'll enter all content for your post, like images and text, and where you'll find our Quiz Maker:**

*BuzzFeed / Via BuzzFeed*

To add a new text box or image, you'll need to create a new subbuzz each time.

Let's get familiar with subbuzzes!

**TEXT:** You can either simply begin typing in the subbuzz to enter text, or you can click on the word "text." In this feature, you can add large text and a caption to each subbuzz, or choose one or the other.

**IMAGE:** This is where you add images and GIFs! You can either just drag and drop them into the box, or upload them from your computer. (For a guide on images you can and can't use, and where to find them, check out our [Photo Resource Guide](#).)

(E.g., <https://web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-post>).



**IMAGE:** This is where you add images and GIFs! You can either just drag and drop them into the box, or upload them from your computer. (For a guide on images you can and can't use, and where to find them, check out our [Photo Resource Guide](#).)

**EMBED:** Click this option to enter embed links (more info on how to embed can be found in our [Photo Resource Guide](#) as well!)

**LINK:** This one's pretty self-explanatory. If you want to include a link, highlight the text you'd like to link, and then click "link." A little box will pop up where you can drop your link, and voilà!

**QUIZ:** This button is for making quizzes, obviously! Make sure you check out our [updated Quiz Guide](#) for a step-by-step walkthrough on how to make a great BuzzFeed Quiz.

**Let's break it down.**  
*DavidRockDesign / Pixabay / Anna Kopsky*

**Once you've created a rad title and written a clever description, you can begin decking out your post by filling out your subbuzzes!**  
*BuzzFeed/Anna Kopsky*

You can either begin typing in the box on top to enter text, or you can click on the word "text" in the subbuzz to start.

**You can then bold, italicize, and add links to your text.**  
*BuzzFeed/Anna Kopsky*

Just highlight the text you're looking to edit, and select one of the options in the bottom right-hand corner of the subbuzz: "B" will bold your text, "I" will italicize it, and the chain icon will open up a box where you can drop a link.

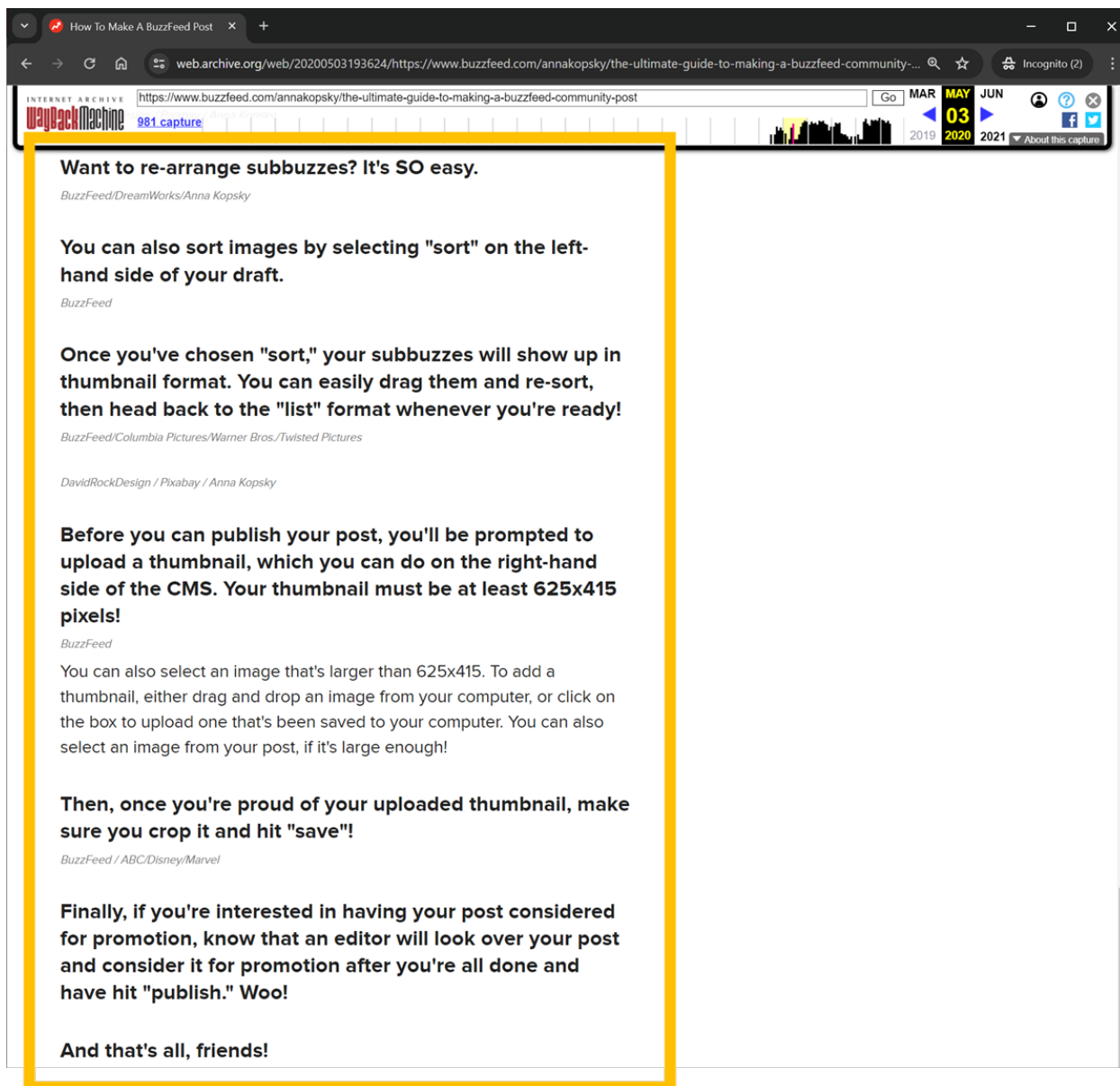
You can also use keyboard shortcuts. Just highlight your text and press "command + b" to bold, or "command + i" to italicize.

*DavidRockDesign / Pixabay / Anna Kopsky*

**You can add stills and GIFs to your post to make it extra awesome by clicking the "image" button in your subbuzz or simply by dropping a .jpg or .gif file in the subbuzz.**  
*BuzzFeed / NBC*

**Then, remember to source the image. For the example**

(E.g., <https://web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-post>).



(E.g., <https://web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-post>).

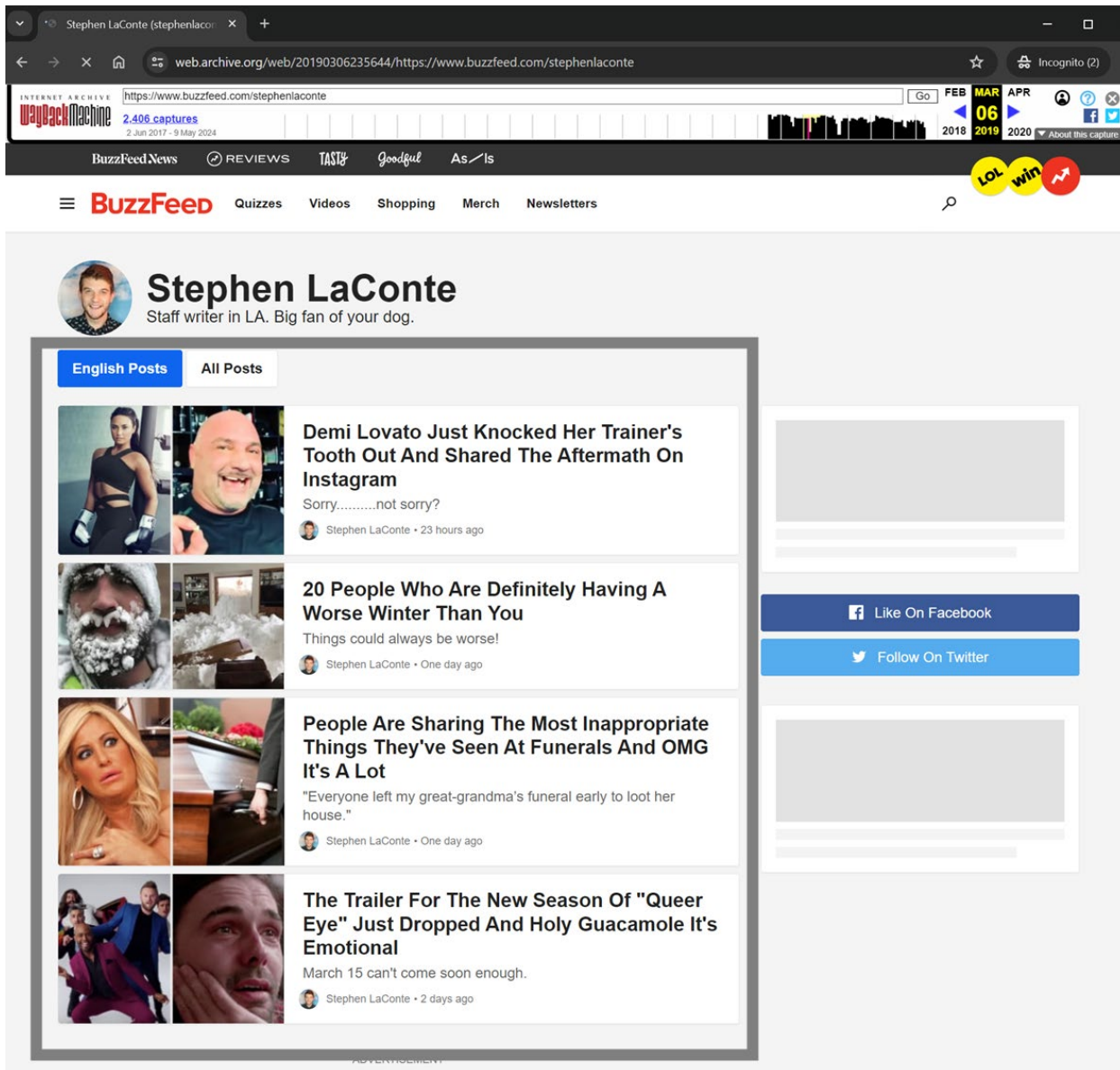
The screenshot shows a web browser window with the URL [buzzfeedbanter.home.blog/2018/12/11/the-steps-to-creating-and-deleting-your-buzzfeed-account-an-overview-of-the-app/](https://buzzfeedbanter.home.blog/2018/12/11/the-steps-to-creating-and-deleting-your-buzzfeed-account-an-overview-of-the-app/). The page features the BuzzFeed Banter logo (a red circle with a white upward-pointing arrow) and the text "Buzzfeed Banter a CS371 group project". The main heading is "The steps to creating and deleting your BuzzFeed account: An overview of the app". Below the heading, it says "Posted on December 11, 2018 by buzzfeedbanter". The main content is enclosed in a yellow border and includes the following text:

Creating your BuzzFeed account is easy, deleting it is a whole other story. You can create a BuzzFeed account with your email address by completing the following 10 easy steps.

- 01 Download the BuzzFeed app from your phones app store.
- 02 Open the BuzzFeed app.
- 03 Click on the face icon in the top right corner of the app.
- 04 Connect with your email address by clicking 'Sign up with Email'.
- 05 You will then be redirected to your web browser and asked to make a username, put your email address in and create a password.
- 06 After you've done this you must go to your email account and validate the email address you are using for your BuzzFeed account.
- 07 Voila! Go back to your BuzzFeed app and login with your information to start scrolling and bookmarking your favourite articles and quizzes!

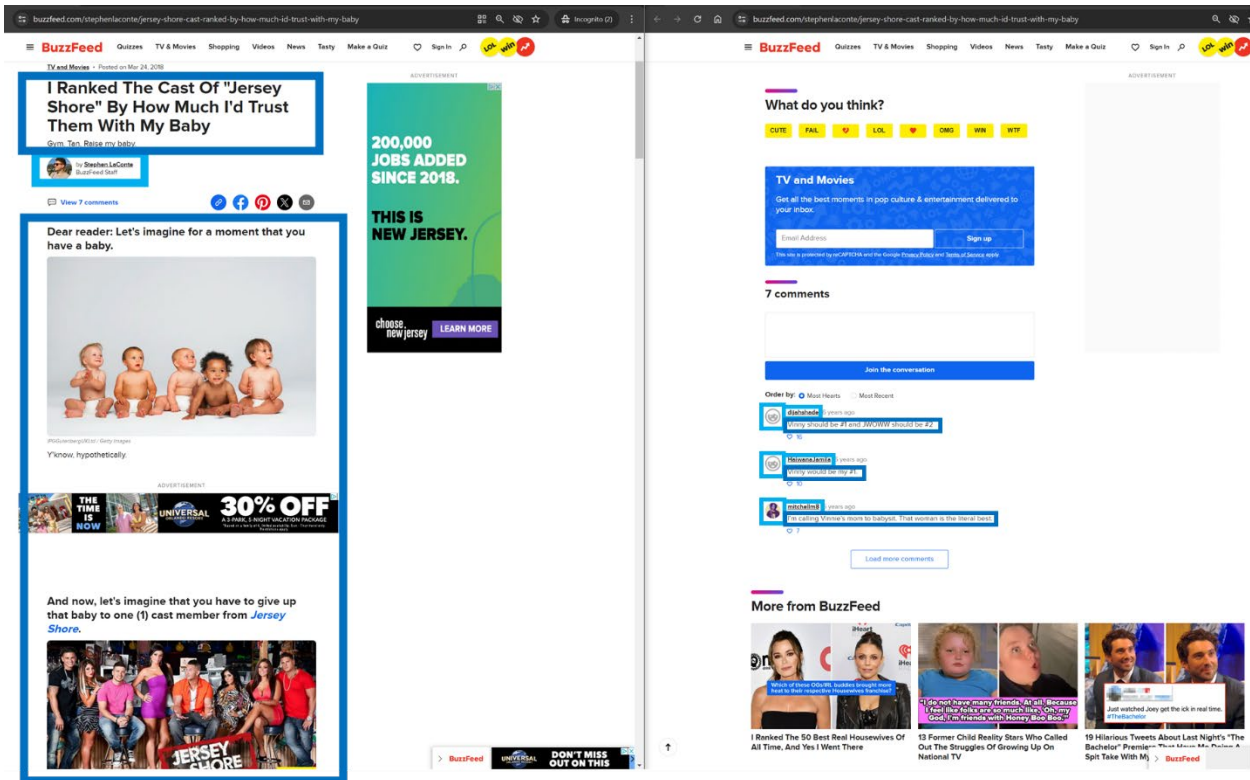
Many BuzzFeed users are familiar with BuzzFeed's content from seeing it on other social media platforms, like Facebook, YouTube, Twitter, etc. The majority of people who enjoy BuzzFeed's content don't have a specific BuzzFeed account, however, there are a lot of benefits to creating a BuzzFeed specific account. After creating an actual BuzzFeed account the best benefit is being able to keep track of your favorite articles, videos, and quizzes by bookmarking them. This is a great way to keep track of your favorite BuzzFeed content. Due to there being thousands of BuzzFeed articles, videos, and quizzes it's way too easy to lose track of the content you love without this feature.

(E.g., <https://web.archive.org/web/20200503193624/https://www.buzzfeed.com/annakopsky/the-ultimate-guide-to-making-a-buzzfeed-community-post>).



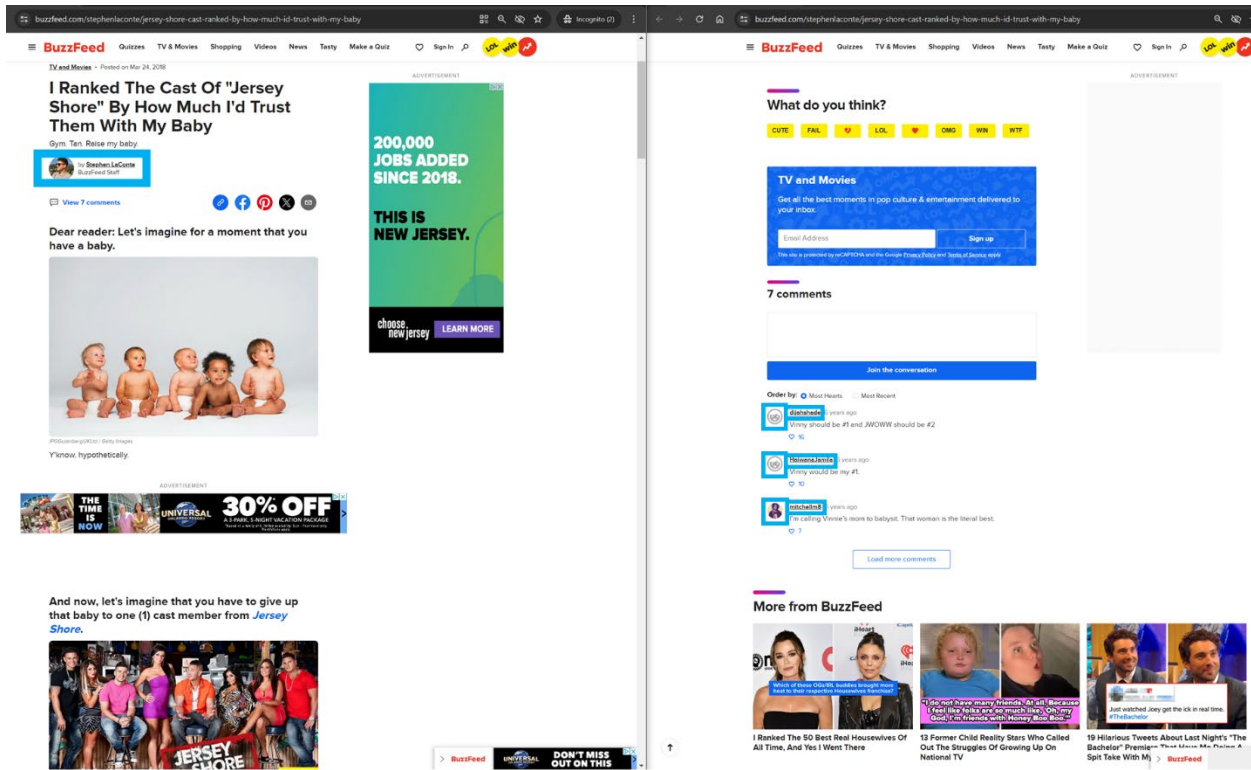
(E.g., <https://web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte>).

48. The electronic media submissions database of the Accused Instrumentality used by BuzzFeed which stores the submissions further stores data identifying the submitter and data indicating content for each electronic media submission (e.g., Article or Comment). As shown below, data identifying the user-submitter includes, e.g., a name and a profile picture. Data indicating content for each electronic media submission includes photo and/or textual content pertaining to the Article.



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

49. The Accused Instrumentality electronically generates multimedia files from the retrieved electronic media submissions, in accordance with a selected digital format (e.g., a digital format compatible with a selected digital format compatible with the particular device such as a computer or smart phone incorporating one or more browsers or apps), and the identification of the submitter is maintained with each retrieved submission within the multimedia file. As shown below, data identifying the user-submitter includes, e.g., a name identifying the user.



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

50. The Accused Instrumentality employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus in order to serve multimedia profile and/or post content with associated photo, profile picture, and textual content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. For example, as shown below, multimedia content associated with the Article or a contributor/user profile is provided on various user devices (e.g., computers or other devices with a web browser or app) in response to a user logging in to the Accused Instrumentality. BuzzFeed uses function-specific subsystems, for example as discussed below.

Stephen LaConte (stephenlacon...)

web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte

INTERNET ARCHIVE Wayback Machine 2,406 captures 2 Jun 2017 - 9 May 2024

BuzzFeed News REVIEWS TASTE Goodful As/Is

BuzzFeed Quizzes Videos Shopping Merch Newsletters

LOL win

**Stephen LaConte**  
Staff writer in LA. Big fan of your dog.

English Posts All Posts

**Demi Lovato Just Knocked Her Trainer's Tooth Out And Shared The Aftermath On Instagram**  
Sorry.....not sorry?  
Stephen LaConte • 23 hours ago

**20 People Who Are Definitely Having A Worse Winter Than You**  
Things could always be worse!  
Stephen LaConte • One day ago

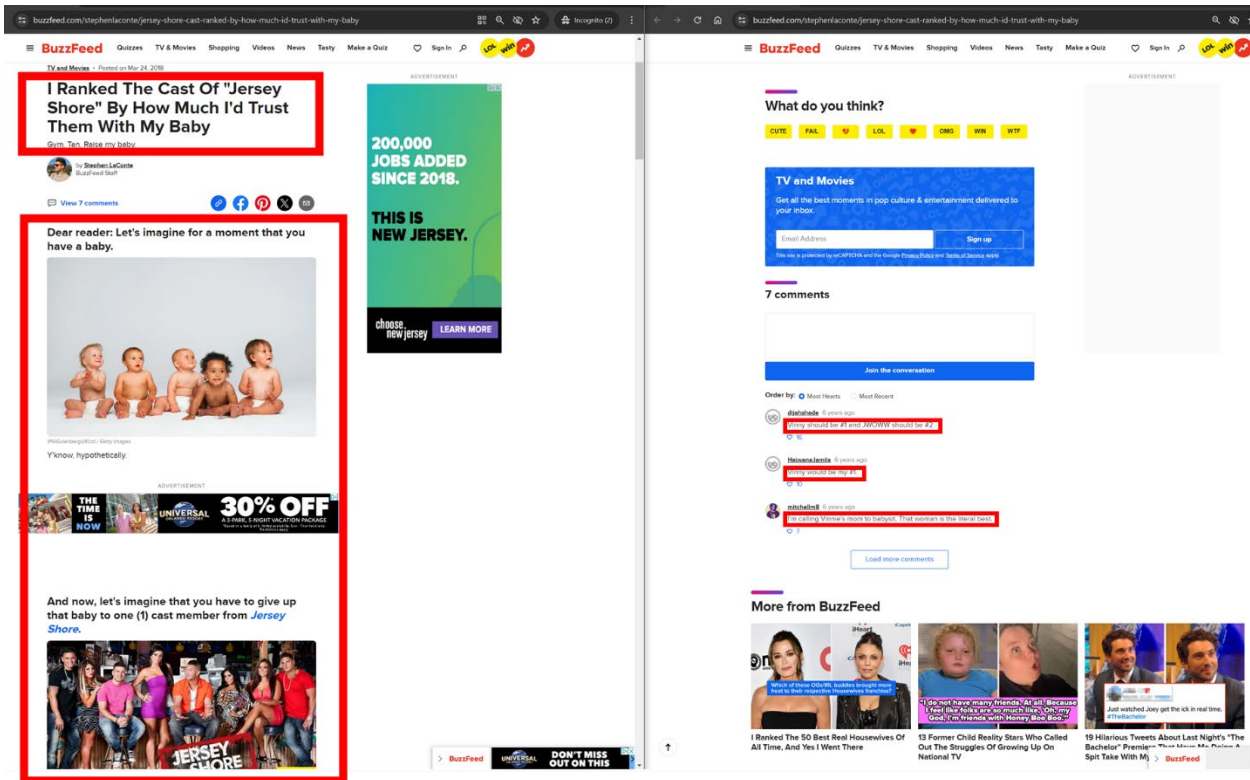
**People Are Sharing The Most Inappropriate Things They've Seen At Funerals And OMG It's A Lot**  
"Everyone left my great-grandma's funeral early to loot her house."  
Stephen LaConte • One day ago

**The Trailer For The New Season Of "Queer Eye" Just Dropped And Holy Guacamole It's Emotional**  
March 15 can't come soon enough.  
Stephen LaConte • 2 days ago

Like On Facebook

Follow On Twitter

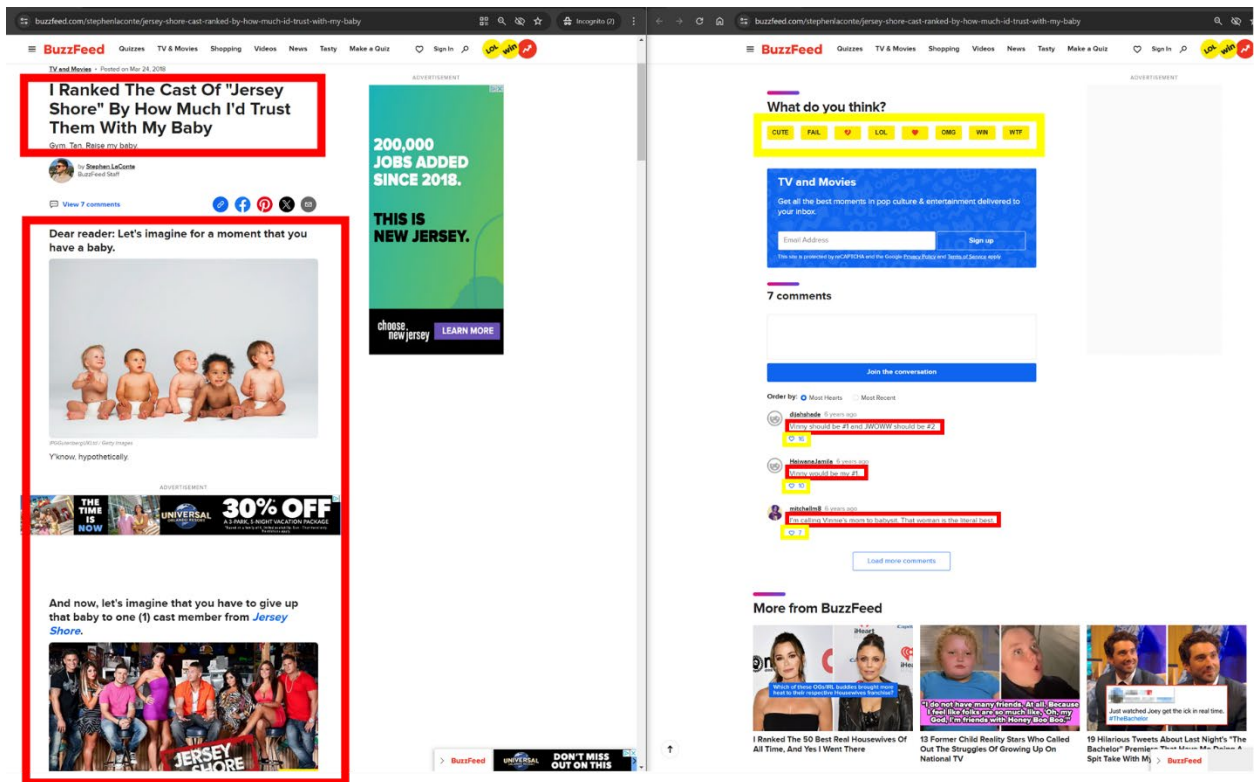
(E.g., <https://web.archive.org/web/20190306235644/https://www.buzzfeed.com/stephenlaconte>).



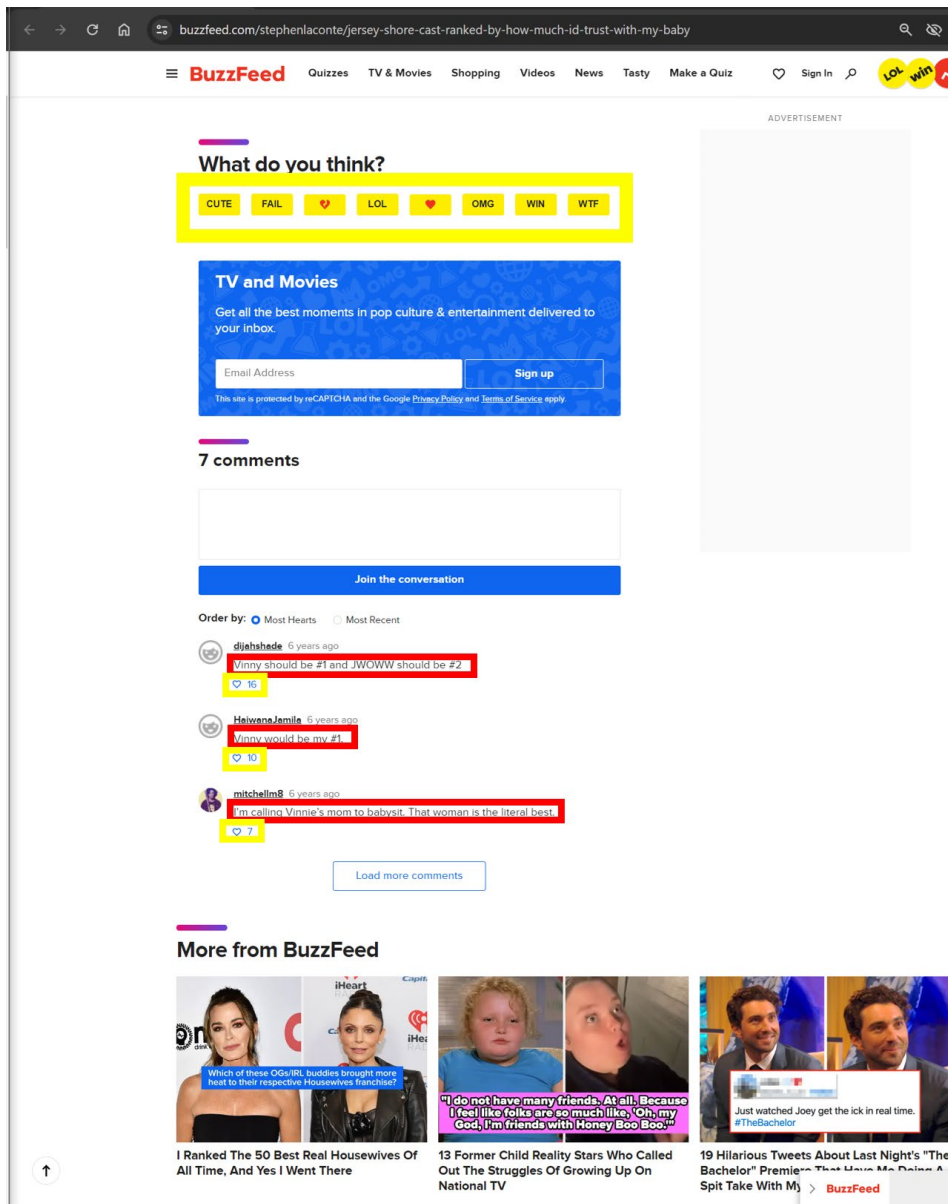
(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

51. The Accused Instrumentality employs an electronic voting subsystem, necessarily having one or more data processing apparatus in order to track voting or electronic rating, configured to enable a user to electronically vote for or rate an electronically available multimedia content (e.g., a multimedia Article provided by a submitter, with accompanying photo and/or textual content), e.g., by the user's choices with respect to a selection of a Like button and textual content in the form of a comment, or by assigning a reaction to an Article such as by characterizing the Article by one or more of CUTE, FAIL, LOL, OMG, WIN, WTF and a heart icon. BuzzFeed uses function-specific subsystems, for example as discussed below.





(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).



(E.g., <https://www.buzzfeed.com/stephenlaconte/jersey-shore-cast-ranked-by-how-much-id-trust-with-my-baby>).

52. Plaintiff has been damaged as a result of Defendant’s infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant’s infringement of the ‘665 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

53. To the extent marking is required, VCA has complied with all marking requirements.

**V. JURY DEMAND**

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

**VI. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that one or more claims of United States Patent No. 9,501,480 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that one or more claims of United States Patent No. 9,477,665 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- c. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- d. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- e. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

July 16, 2024

LOAKNAUTH LAW, P.C.

OF COUNSEL:

David R. Bennett  
(*pro hac vice* to be filed)  
Direction IP Law  
P.O. Box 14184  
Chicago, IL 60614-0184  
(312) 291-1667  
dbennett@directionip.com

/s/ Nicholas Loaknauth  
Nicholas Loaknauth  
1460 Broadway  
New York, NY 10036  
(212) 641-0745  
nick@loaknauthlaw.com  
  
*Attorneys for Plaintiff*  
*Virtual Creative Artists LLC*