

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

ONSTREAM MEDIA CORPORATION,

Plaintiff,

v.

DIGITAL SAMBA, SL,

Defendant.

Case No. 2:25-cv-00086

Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Onstream Media Corporation (“Onstream”) files this Complaint against Digital Samba, SL (“Digital Samba”) for patent infringement of United States Patent Nos. 9,161,068; 9,467,728; 10,038,930; 10,200,648; 10,674,109; 10,694,142; 10,848,707; 10,951,855; and 11,128,833 (the “patents-in suit”) and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 et seq.

THE PARTIES

2. Onstream is a corporation organized under the laws of the State of Florida with its principal place of business at 1451 W. Cypress Creek Rd., No. 204, Ft. Lauderdale, FL 33309.

3. On information and belief, Digital Samba is a foreign corporation, with its principal place of business at Carrer d’Aribau 15, 5/4 08011, Barcelona, Spain.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

5. This Court has personal jurisdiction over Digital Samba in accordance with due process and/or the Texas Long Arm Statute because Digital Samba has committed and continues to commit acts of infringement in the State of Texas giving rise to this action in the State of Texas in violation of at least 35 U.S.C. §§ 271(a) and (b). In particular, on information and belief, Digital Samba has made, used, offered to sell and/or sold infringing products, services and/or systems in Texas.

6. On information and belief, Digital Samba provides services to thousands of clients and “build[s] features that allow millions of people to collaborate, educate, and connect, all in their browser window” including specifically with respect to classroom education, corporates, advertising agencies, sales presentations, retail, enterprises, judicial systems, military, healthcare, government agencies, and viewers located in the State of Texas.¹

7. On information and belief, Digital Samba is used globally in thousands of universities, non-profit organizations, social enterprises, public sector industries, and engages hundreds of millions of viewers at home, at school, and at work including Pearson, American Express, and McDonald’s.²

8. On information and belief, Digital Samba, directly or indirectly,

¹ See <https://www.digitalsamba.com/about-us>

² See <https://www.digitalsamba.com/about-us>

designs, develops, manufactures, makes, sells, offers for sale, imports, distributes, advertises, and/or otherwise promotes the accused infringing methods, products, and services in the United States, the State of Texas, and this Judicial District.

9. On information and belief, Digital Samba has made, used, offered to sell and/or sold products and services, including the following specifically accused products and services: (1) Digital Samba for Meetings;³ (2) Digital Samba Embedded⁴ (3) current or legacy Digital Samba products or services, which use, or have used, one or more of the foregoing products and services as a component product or component service; (4) combinations of products and/or services comprising two or more of the foregoing products and services; (5) and all other current or legacy products and services imported, made, used, sold, or offered for sale by Digital Samba products and services imported, made, used, sold, or offered for sale by Digital Samba that operate, or have operated in a substantially similar manner as the above-listed products and services, (collectively and individually referred to herein as the “Digital Samba Video Products and Services”).

10. On information and belief, Digital Samba (or those acting on its behalf) makes, uses, sells and/or offers to sell the Digital Samba Video Products and Services in the United States, including but not limited to Texas.

11. On information and belief, Digital Samba, as well as the hardware and software components comprising the Digital Samba System that enable the Digital

³ See <https://www.linkedin.com/pulse/what-digital-samba-meetings-getdigitalsamba/>

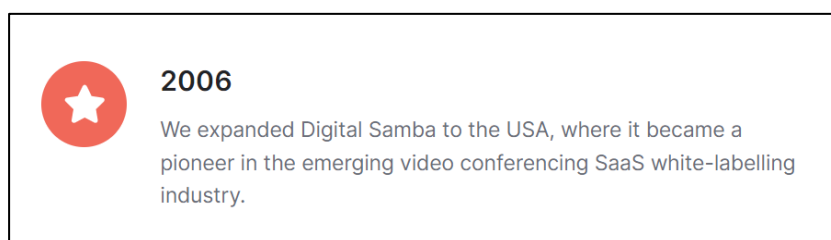
⁴ See <https://dashboard.digitalsamba.com/> and docs.digitalsamba.com/reference

Samba System to operate, including but not limited to servers, server software, client software, and other computer systems and components (collectively referred to herein as the “Digital Samba System”), infringes (literally and/or under the doctrine of equivalents) at least one claim of each of the patents-in-suit.

12. On information and belief, Digital Samba is subject to the Court’s jurisdiction because it regularly markets, conducts, and solicits business, or otherwise engages in other persistent courses of conduct in Texas, and/or derives substantial revenue from the sale and distribution of goods and services provided to individuals and businesses in Texas including with respect to the accused Digital Samba System.

13. On information and belief, the accused Digital Samba System, that Digital Samba uses, makes, markets, distributes, offers to sell, and sells to consumers throughout the United States, including in Texas, infringe one or more of the claims of the patents-in-suit.

14. On information and belief, Digital Samba derives substantial revenue within the state from the offer of infringing products and services, including but not limited to the Digital Samba System. On information and belief, users who reside in the State of Texas regularly use the accused Digital Samba System while they are present in the State of Texas.



5

International expansion: presence in five countries

This year, the objective was to enter into the market and have a presence in France and the United Kingdom. Currently, the **technology is available in five countries**: Spain, **the USA**, Germany, Sweden and Austria. "In the last year, we have strengthened our expansion in Europe, with the new office in Vienna (Austria) and this year is expected to continue with this expansion and enter into the British and French markets", confirms Robert Strobl, CMO of Digital Sambas. "**We already have several clients in these countries**, including companies and organizations from different sectors, for example the University of Cardiff or CEVA in the United Kingdom, which use OnSync for online teaching", he adds.

6

Some amazing companies we've worked with along the way

Deloitte.



 **Pearson**



D-Link®



Atos



7

 **Pearson | Accelerated Pathways**

Mailing Address

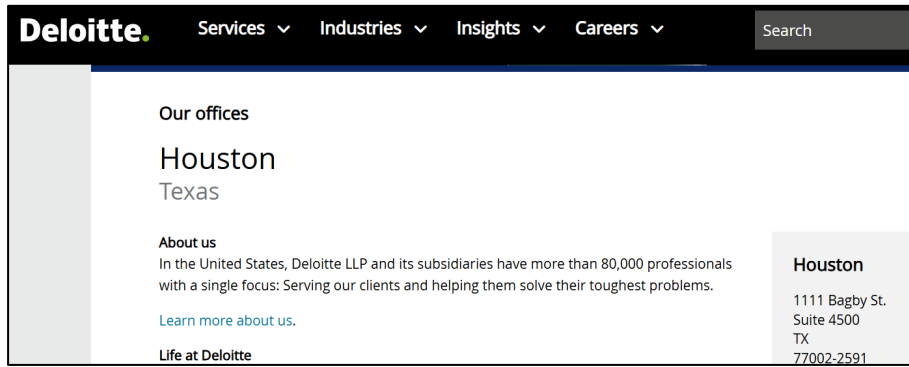
927 E. Sonterra Blvd. Suite 119
San Antonio, Texas 78258

⁵ See <https://www.digitalsamba.com/blog/happy-20th-birthday-digital-samba>

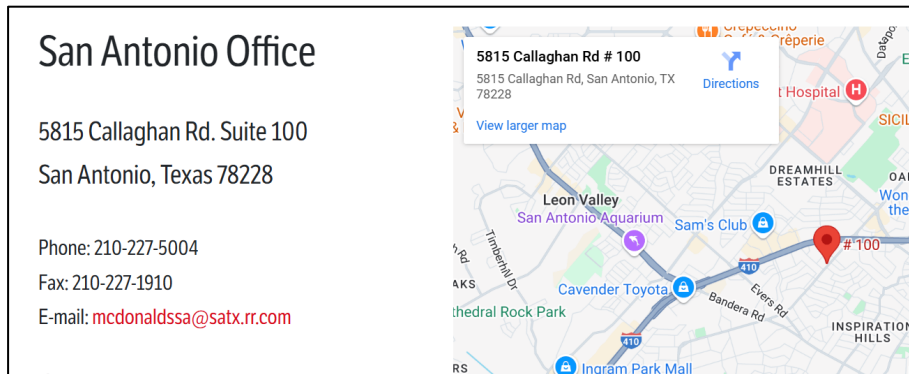
⁶ See <https://www.digitalsamba.com/blog/digital-samba-2016-growth>

⁷ See <https://www.digitalsamba.com/about-us>

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9



10

15. Venue is proper pursuant to 28 U.S.C. §§ 1391(b), (c), (d) and/or 1400(b), at least because Digital Samba is a foreign corporation, and venue is proper in any district.

United States Patent No. 9,161,068

16. On October 13, 2015, the United States Patent and Trademark Office (“USPTO”) duly and legally issued United States Patent No. 9,161,068 (“the ‘068 patent”) entitled “Remotely Accessed Virtual Recording Room” to inventor Gregory Duane Ellis. A true and correct copy of the ‘068 patent is attached as Exhibit 1.

17. The ‘068 patent is presumed valid under 35 U.S.C. § 282.

⁸ See <https://www.pearsonaccelerated.com/contact.html>

⁹ See <https://www2.deloitte.com/us/en/footerlinks/office-locator/texas/houston.html>

¹⁰ See <https://txmcd.com/contact-information/>

18. Onstream owns all rights, title, and interest in the '068 patent.

19. Onstream has not granted Digital Samba an approval, an authorization, or a license to the rights under the '068 patent.

20. The '068 patent relates to, among other things, an audio and video stream recording, storage, and delivery system.

21. The claimed invention(s) of the '068 patent sought to solve problems with, and improve upon, existing audio and video recording, storage, and delivery systems. For example, the '068 patent states:

Unfortunately, new systems and methods for increasing the capabilities of online business-related communications and transactions often result in increased intellectual complexity and/or increased computer system requirements. This tendency is undesirable because another main avenue for increasing the productivity of online business-related communications and transactions is to increase the number of people who are participating in these online business-related transactions.

See '068 Specification at col. 1, ll. 31-39.

22. The '068 patent then states:

Accordingly, it would be highly valuable if any new systems and methods for increasing the capabilities of online business-related communications and transactions also could be simple enough to help attract new users to the online business market and also not have extensive computer system requirements.

See '068 Specification at col. 1, ll. 39-44.

23. The '068 patent then also states:

Accordingly, there has been a long existing need for a system that improves the level of communication possible with respect to online business-related transactions. Further, there is a continuing need for an improved system and/or method that is simple, efficient, and does not have extensive computer system requirements. Accordingly, those skilled in the art have long recognized the need for a system and method that addresses these and other issues.

See '068 Specification at col. 1, ll. 45-52.

24. The invention(s) claimed in the '068 patent solves various technological problems inherent in the then-existing audio and video recording, storage, and delivery systems and enables audio and video recording, storage, and delivery systems to, among other things, (1) function more efficiently, (2) lower the required level of expertise for users of such systems, (3) avoid the need to install and burden front end computer and electronic devices with additional software, (4) reduce or eliminate entirely the need for local memory storage devices and other specialized recording equipment, and (5) reduce or eliminate other hardware and software requirements inherent in prior art audio and video recording and distribution systems.

United States Patent No. 9,467,728

25. On October 11, 2016, the USPTO duly and legally issued United States Patent No. 9,467,728 ("the '728 patent") entitled "Remotely Accessed Virtual Recording Room" to inventor Gregory Ellis. A true and correct copy of the '728 patent is attached as Exhibit 2.

26. The '728 patent is presumed valid under 35 U.S.C. § 282.

27. Onstream owns all rights, title, and interest in the '728 patent.

28. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the '728 patent.

29. The '728 patent relates to, among other things, an audio and video stream recording, storage, and delivery system.

30. The specification of the '728 patent is the same as the '068 patent

specification, and solves the problems recited above and described in the '068 patent specification.

United States Patent No. 10,038,930

31. On July 31, 2018 the USPTO duly and legally issued United States Patent No. 10,038,930 ("the '930 patent") entitled "Remotely Accessed Virtual Recording Room" to inventor Gregory Duane Ellis. A true and correct copy of the '930 patent is attached as Exhibit 3.

32. The '930 patent is presumed valid under 35 U.S.C. § 282.

33. Onstream owns all rights, title, and interest in the '930 patent.

34. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the '930 patent.

35. The '930 patent relates to, among other things, an audio and video stream recording, storage, and delivery system.

36. The claimed invention(s) of the '930 patent sought to solve problems with, and improve upon, existing audio and video recording, storage, and delivery systems. The specification of the '930 patent is the same as the '068 patent specification, and solves the problems recited above and described in the '068 patent specification.

United States Patent No. 10,200,648

37. On February 5, 2019, the USPTO duly and legally issued United States Patent No. 10,200,648 ("the '648 patent") entitled "Remotely Accessed Virtual Recording Room" to inventor Gregory Duane Ellis. A true and correct copy of the '648 patent is attached as Exhibit 4.

38. The '648 patent is presumed valid under 35 U.S.C. § 282.

39. Onstream owns all rights, title, and interest in the '648 patent.

40. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the '648 patent.

41. The '648 patent relates to, among other things, an audio and video stream recording, storage, and delivery system.

42. The claimed invention(s) of the '648 patent sought to solve problems with, and improve upon, existing audio and video recording, storage, and delivery systems. The specification of the '648 patent is the same as the '068 patent specification, and solves the problems recited above and described in the '068 patent specification.

United States Patent No. 10,674,109

43. On June 2, 2020, the USPTO duly and legally issued United States Patent No. 10,674,109 ("the '109 patent") entitled "Remotely Accessed Virtual Recording Room" to inventor Gregory Duane Ellis. A true and correct copy of the '109 patent is attached as Exhibit 5.

44. The '109 patent is presumed valid under 35 U.S.C. § 282.

45. Onstream owns all rights, title, and interest in the '109 patent.

46. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the '109 patent.

47. The '109 patent relates to, among other things, an audio and video stream recording, storage and delivery system.

48. The claimed invention(s) of the '109 patent sought to solve problems

with, and improve upon, existing audio and video recording, storage, and delivery systems. The specification of the '109 patent is the same as the '068 patent specification, and addresses and solves the problems recited above and described in the '068 patent specification.

United States Patent No. 10,694,142

49. On June 23, 2020, the USPTO duly and legally issued United States Patent No. 10,694,142 (“the '142 patent”) entitled “Remotely Accessed Virtual Recording Room” to inventor Gregory Duane Ellis. A true and correct copy of the '142 patent is attached as Exhibit 6.

50. The '142 patent is presumed valid under 35 U.S.C. § 282.

51. Onstream owns all rights, title, and interest in the '142 patent.

52. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the '142 patent.

53. The '142 patent relates to, among other things, an audio and video stream recording, storage and delivery system.

54. The claimed invention(s) of the '142 patent sought to solve problems with, and improve upon, existing audio and video recording, storage, and delivery systems. The specification of the '142 patent is the same as the '068 patent specification, and addresses and solves the problems recited above and described in the '068 patent specification.

United States Patent No. 10,848,707

55. On November 24, 2020, the USPTO duly and legally issued United States Patent No. 10,848,707 (“the '707 patent”) entitled “Remotely Accessed Virtual

Recording Room” to inventor Gregory Duane Ellis. A true and correct copy of the ‘707 patent is attached as Exhibit 7.

56. The ‘707 patent is presumed valid under 35 U.S.C. § 282.

57. Onstream owns all rights, title, and interest in the ‘707 patent.

58. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the ‘707 patent.

59. The ‘707 patent relates to, among other things, an audio and video stream recording, storage and delivery system.

60. The claimed invention(s) of the ‘707 patent sought to solve problems with, and improve upon, existing audio and video recording, storage, and delivery systems. The specification of the ‘707 patent is the same as the ‘068 patent specification, and addresses and solves the problems recited above and described in the ‘068 patent specification.

United States Patent No. 10,951,855

61. On March 16, 2021, the USPTO duly and legally issued United States Patent No. 10,951,855 (“the ‘855 patent”) entitled “Remotely Accessed Virtual Recording Room” to inventor Gregory Duane Ellis. A true and correct copy of the ‘068 patent is attached as Exhibit 8.

62. The ‘855 patent is presumed valid under 35 U.S.C. § 282.

63. Onstream owns all rights, title, and interest in the ‘855 patent.

64. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the ‘855 patent.

65. The ‘855 patent relates to, among other things, an audio and video

stream recording, storage and delivery system.

66. The specification of the '855 patent is the same as the '068 patent specification, and addresses and solves the problems recited above and described in the '855 patent specification.

United States Patent No. 11,128,833

67. On November 24, 2020, the USPTO duly and legally issued United States Patent No. 11,128,833 ("the '833 patent") entitled "Remotely Accessed Virtual Recording Room" to inventor Gregory Duane Ellis. A true and correct copy of the '833 patent is attached as Exhibit 9.

68. The '833 patent is presumed valid under 35 U.S.C. § 282.

69. Onstream owns all rights, title, and interest in the '833 patent.

70. Onstream has not granted Digital Samba an approval, an authorization or a license to the rights under the '833 patent.

71. The '833 patent relates to, among other things, an audio and video stream recording, storage and delivery system.

72. The claimed invention(s) of the '833 patent sought to solve problems with, and improve upon, existing audio and video recording, storage, and delivery systems. The specification of the '833 patent is the same as the '068 patent specification, and addresses and solves the problems recited above and described in the '068 patent specification.

CLAIMS FOR RELIEF

Count I - Infringement of United States Patent No. 9,161,068

73. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

74. On information and belief, Digital Samba (or those acting on its behalf) makes, uses, sells and/or offers to sell the Digital Samba System in the United States. Digital Samba, as well as the Digital Samba System, infringes (literally and/or under the doctrine of equivalents) at least claim 1 of the '068 patent.

75. On information and belief, Digital Samba and the Digital Samba System employs and provides a method that records audio and video material over an Internet browser connection established between a user front end and a host back end.

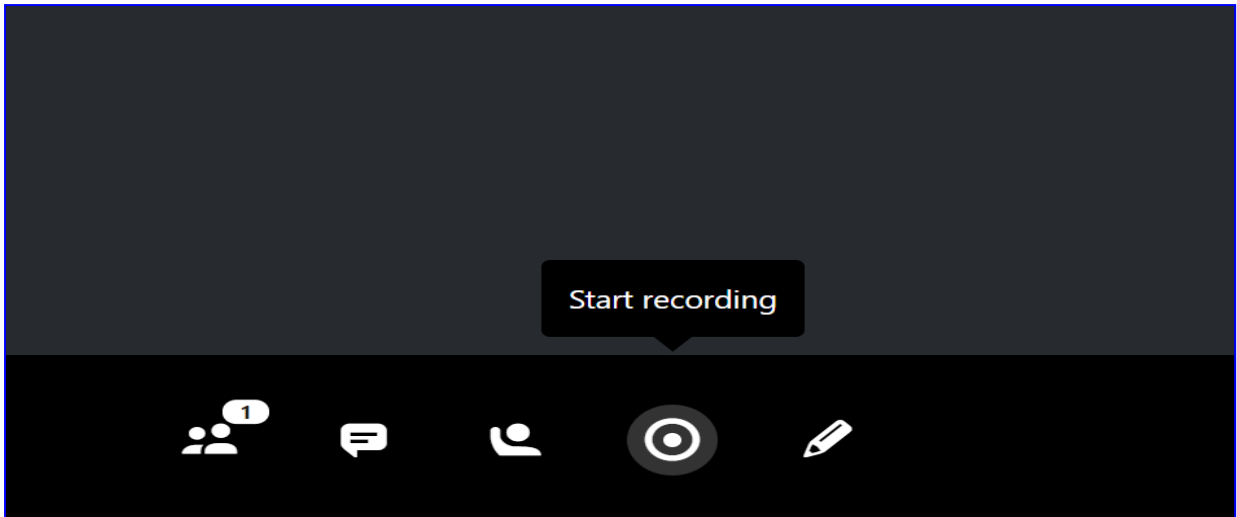
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

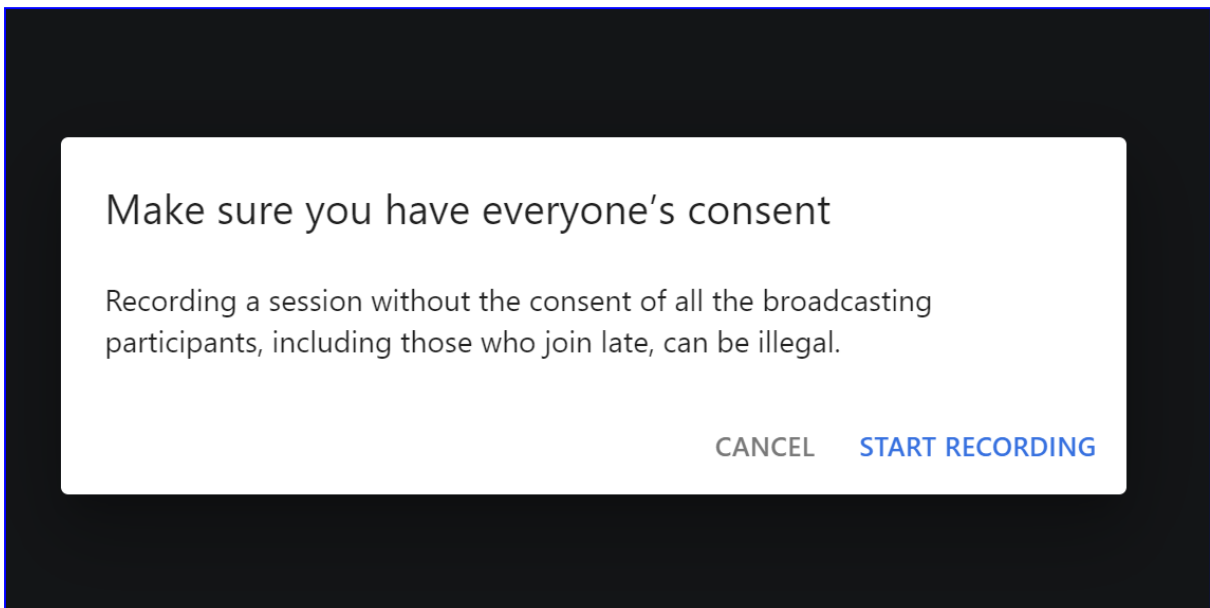
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

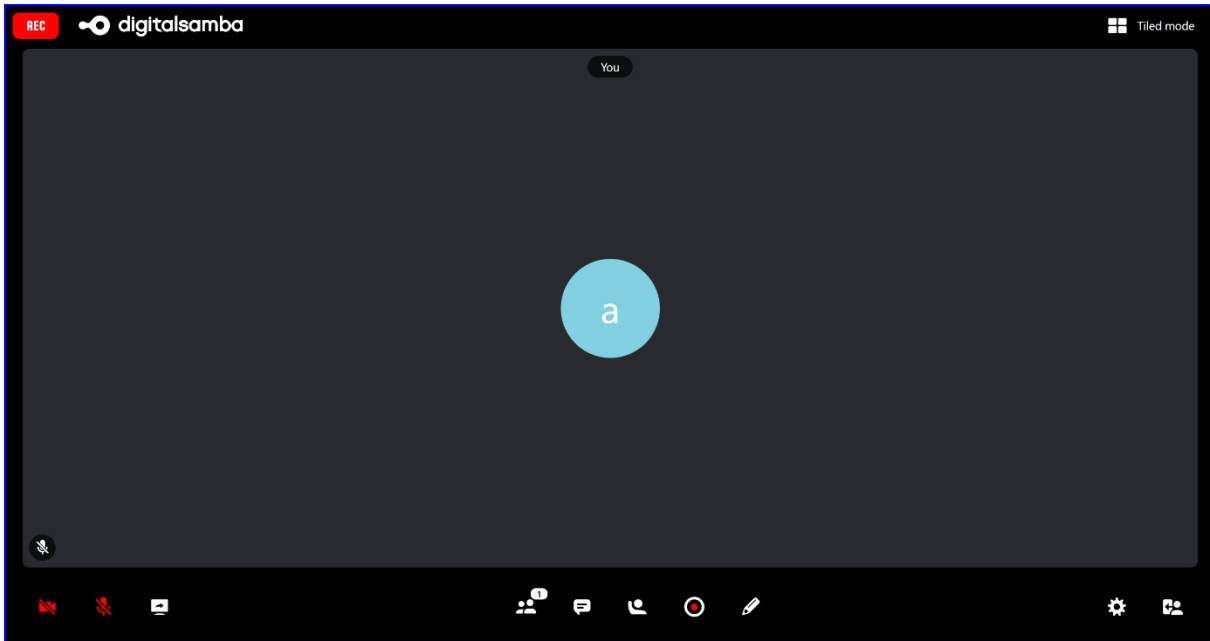
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

76. On information and belief, the Digital Samba System can either be accessed through an Internet browser on a desktop computer or a mobile device.

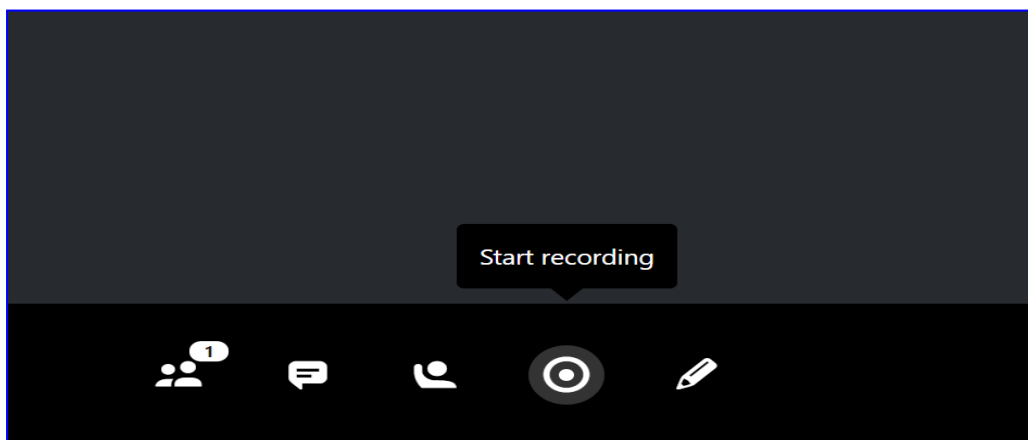
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

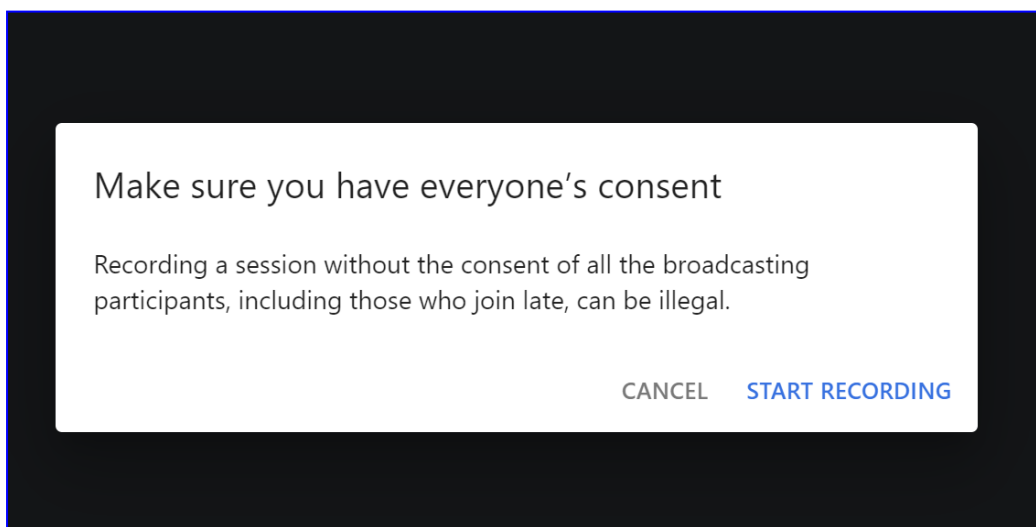
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

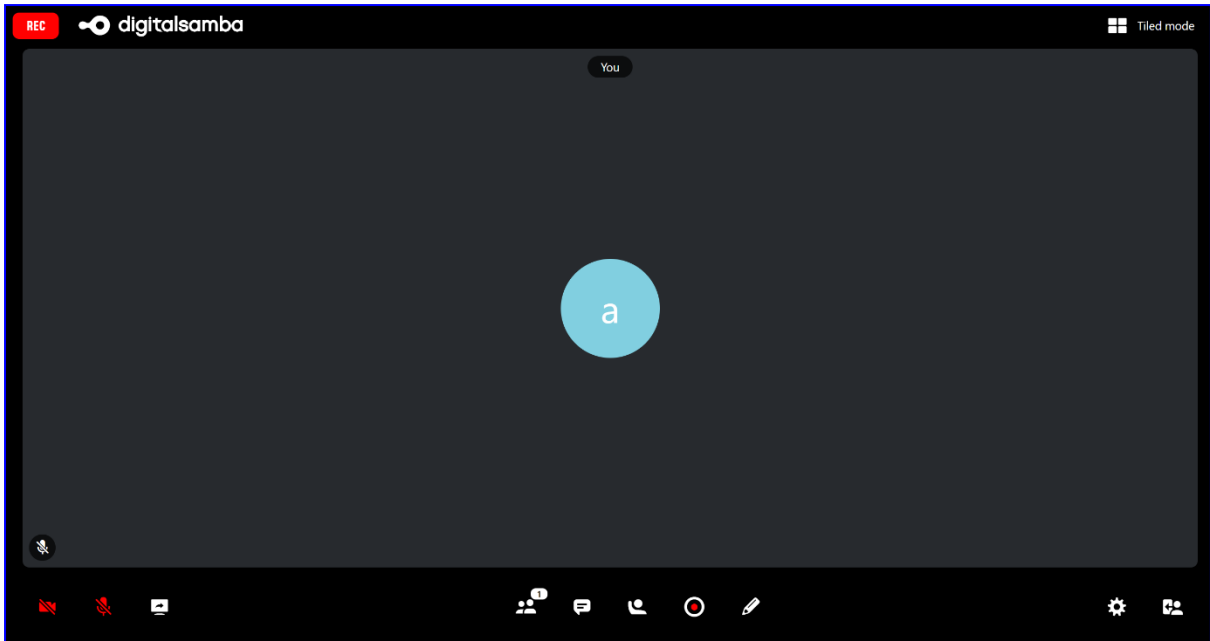
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

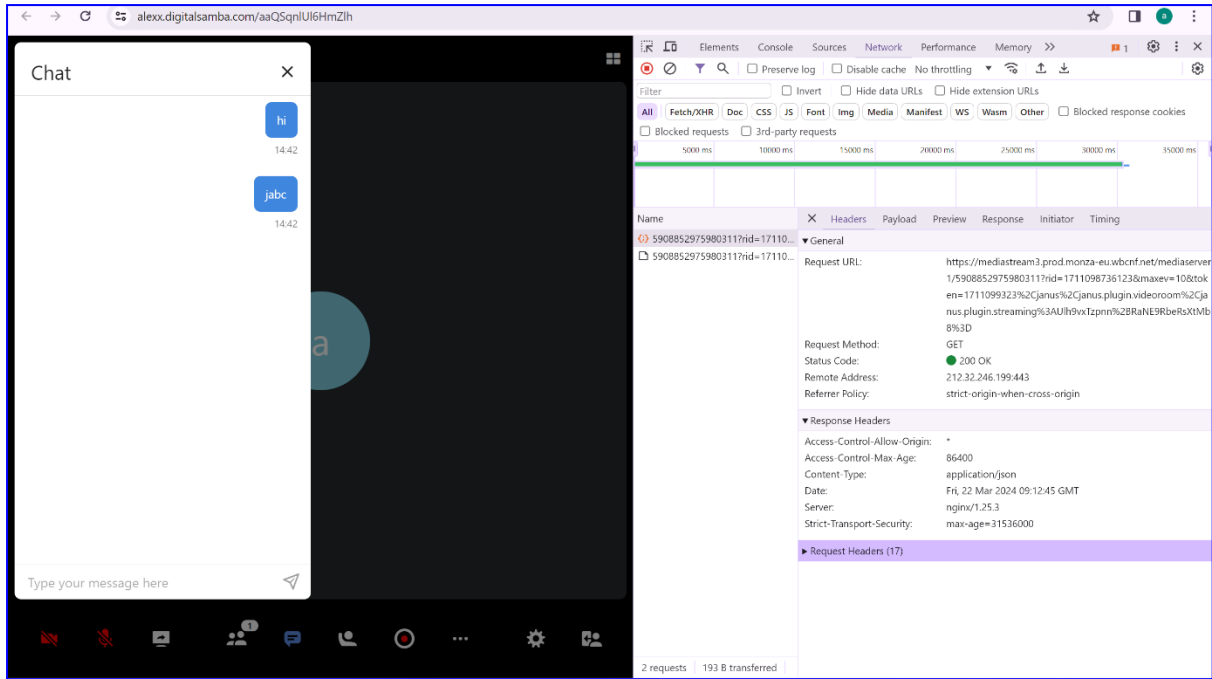


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

77. On information and belief, when a user wants to begin streaming using the Digital Samba System, servers of the Digital Samba System deliver a code, which can be executed by a browser.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

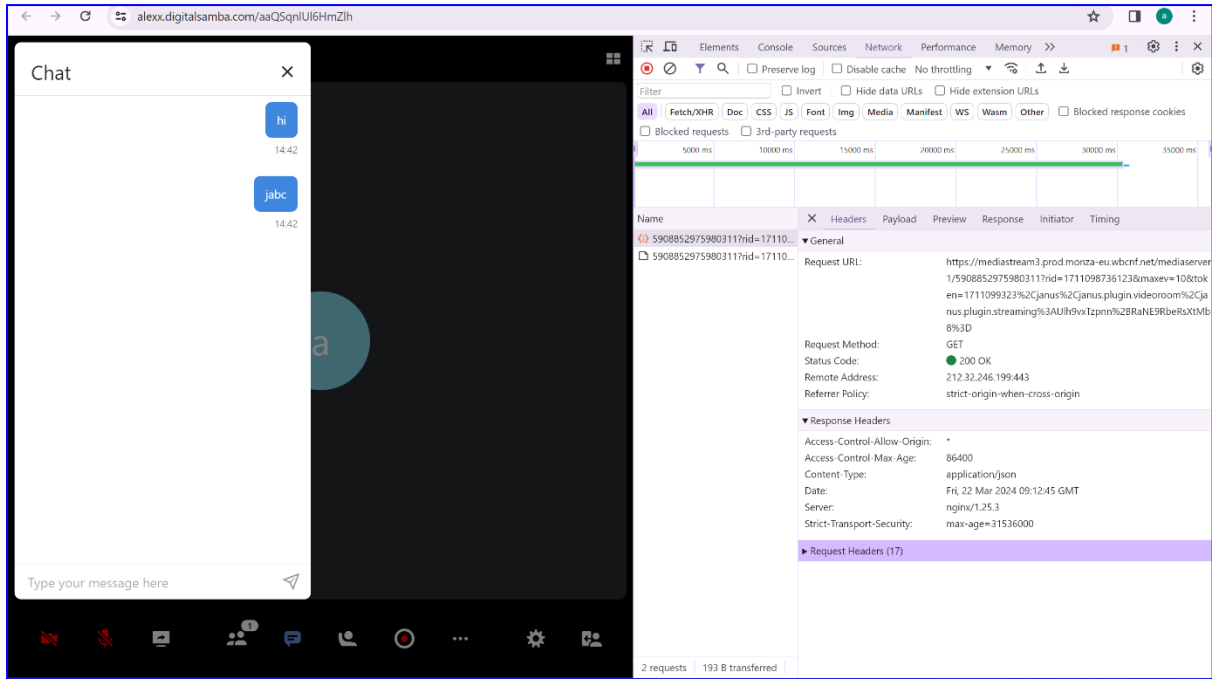


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

78. On information and belief, the Digital Samba System delivers a code that enables the streaming of audio and video material.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

79. On information and belief, the Digital Samba System delivers a browser executable-code that is a browser independent recording application that initiates the audio and video stream to be recorded.

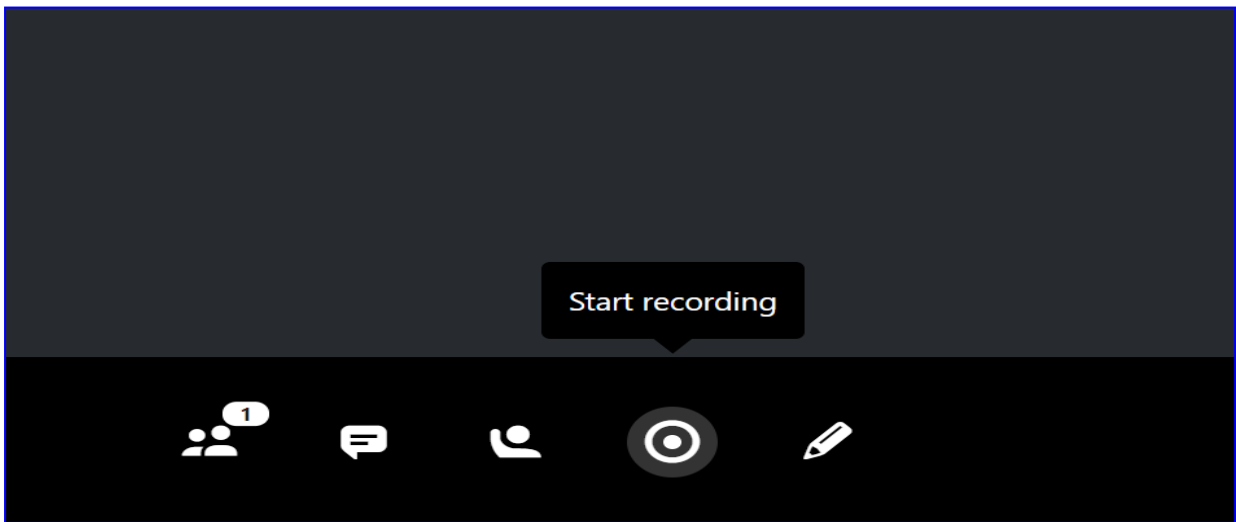
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
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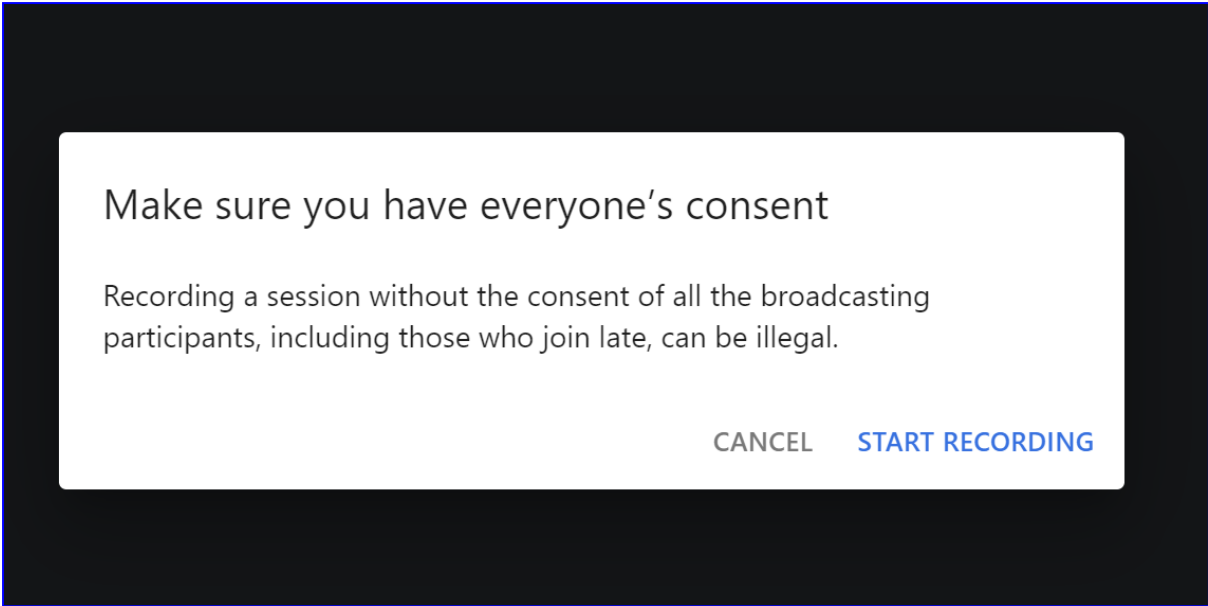
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Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

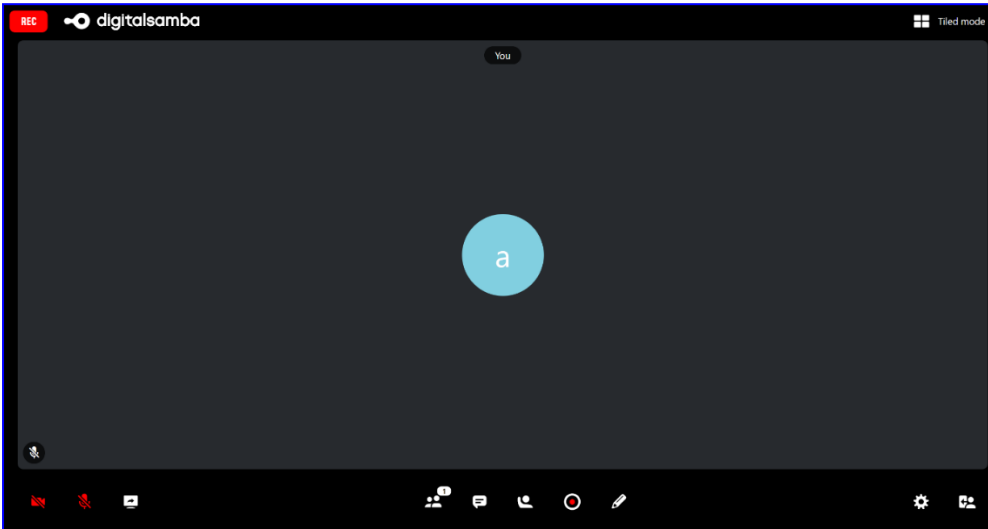
See e.g., <https://www.digitalsamba.com/features>



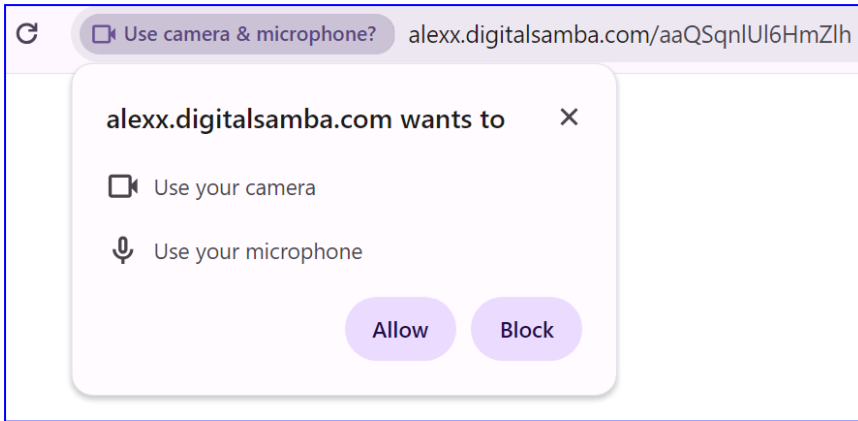
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



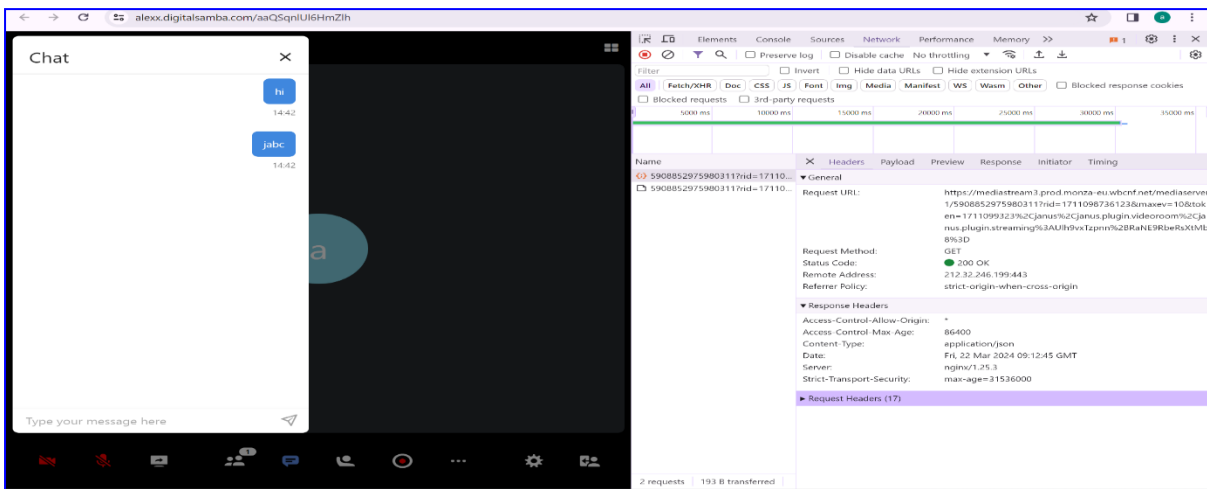
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See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

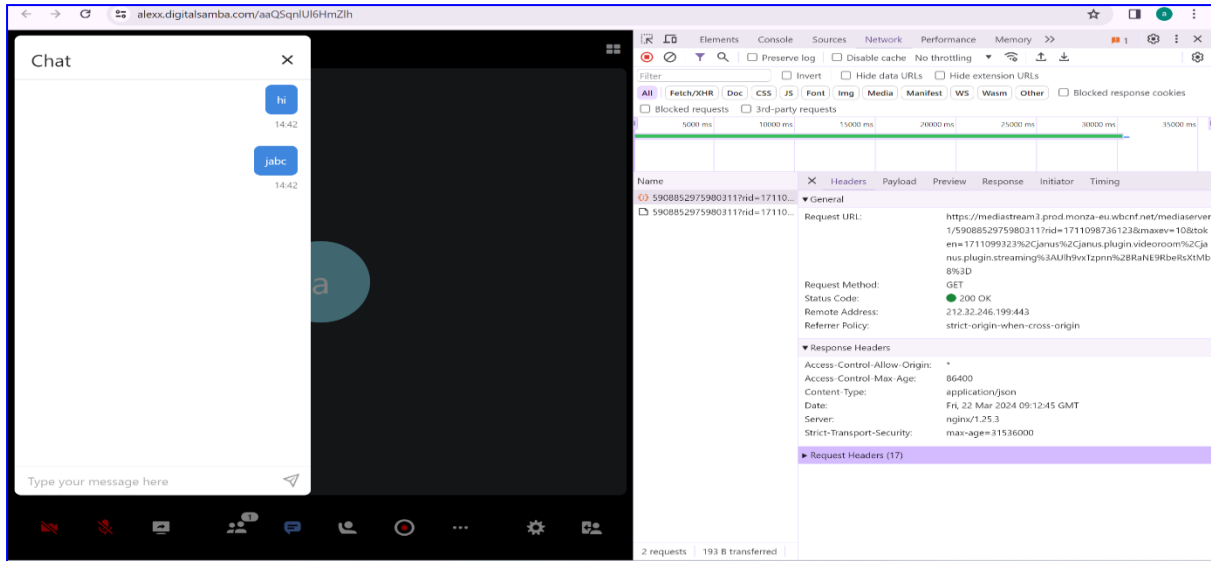


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join)



See e.g., <https://dashUIboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

80. On information and belief, the Digital Samba System delivers a code that is executed through a browser at the user front end.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

81. On information and belief, the Digital Samba System uses an Internet connection.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Audio	Video	Video (HQ and resolution)	Screen sharing	
Minimum 50 kbps upload/download (100 kbps recommended)	Minimum 250kbps upload/download (500 kbps recommended)	Minimum 900 kbps upload/download (3+ mbps recommended)	Minimum 800 kbps upload/download (1.5+ mbps recommended)	

See e.g., <https://www.digitalsamba.com/tech-specs>

82. The Digital Samba System employs and provides a method wherein audio and video material is streamed over the Internet as the audio and video material is captured by a recording device.

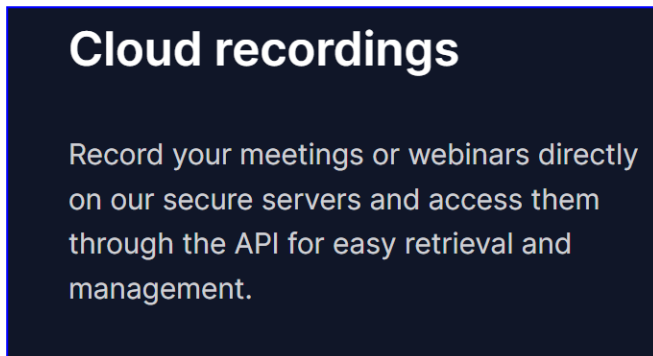
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

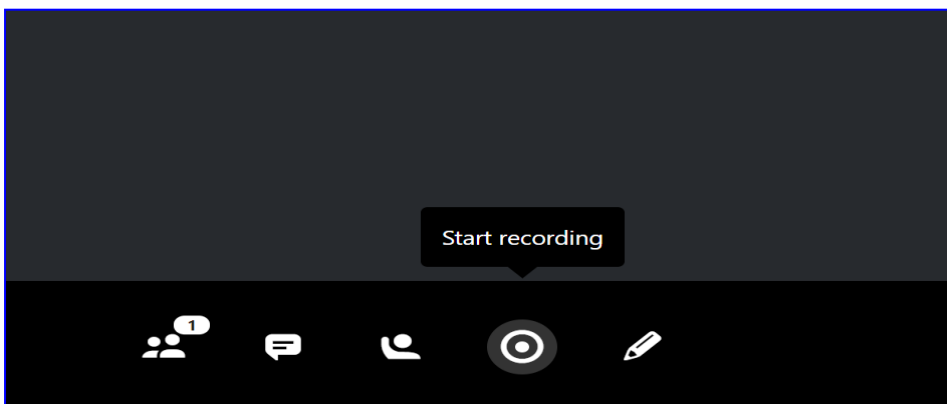
83. On information and belief, the Digital Samba System uses and provides a method wherein audio and video material is captured without using any recording software installed on the user front end.

Windows	Mac	Linux
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.

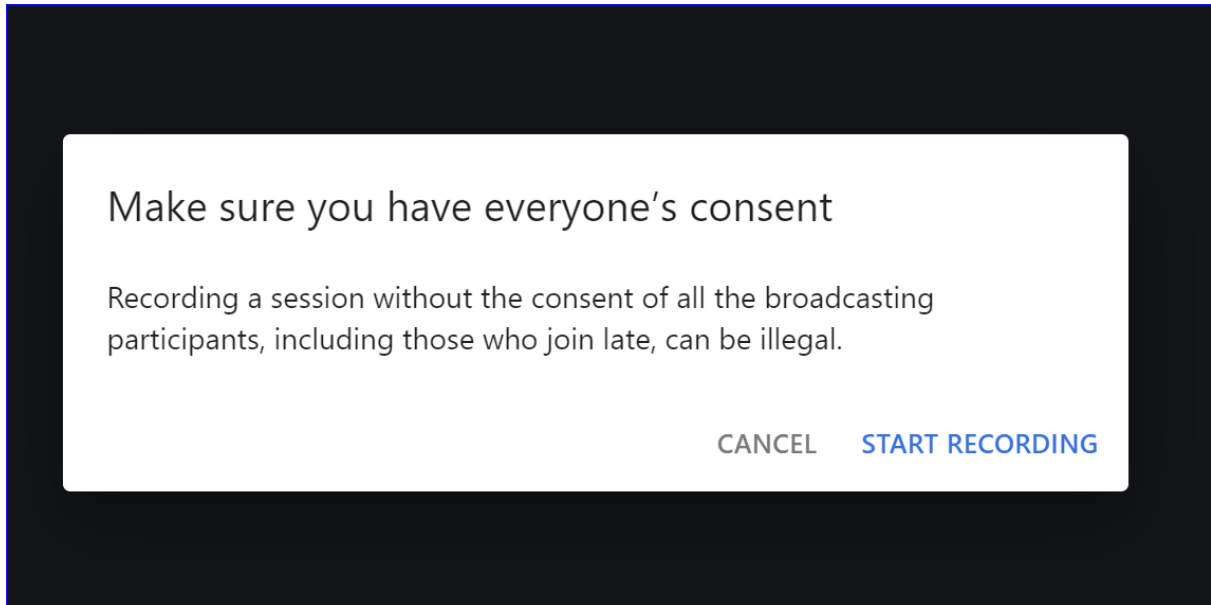
See e.g., <https://www.digitalsamba.com/tech-specs>



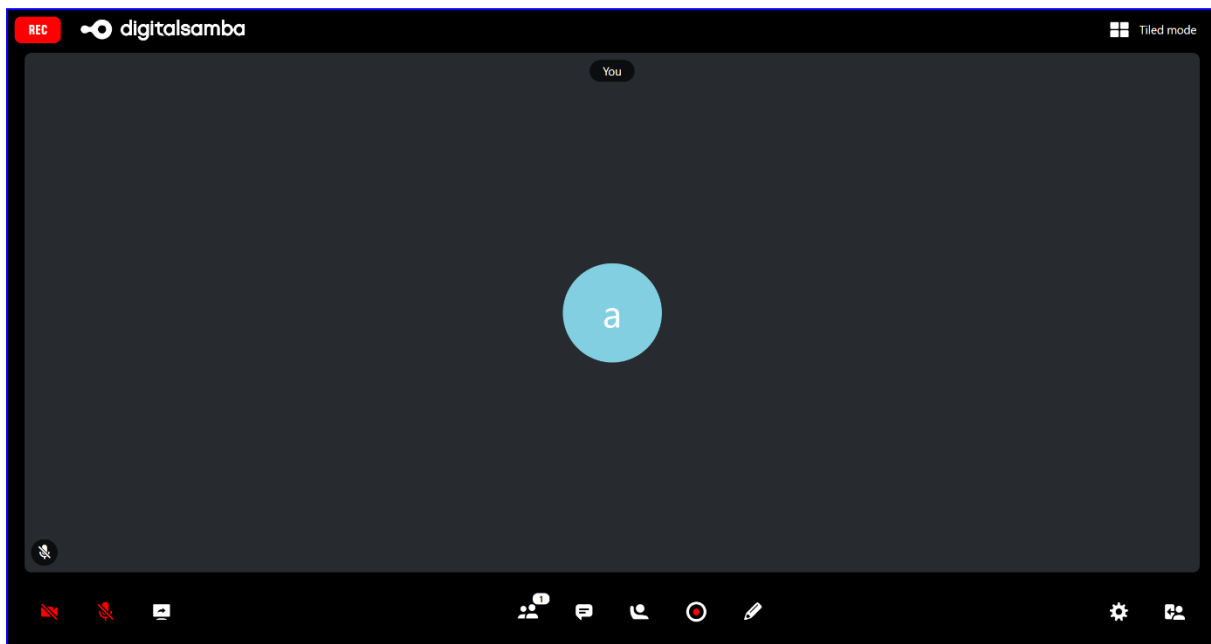
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

84. On information and belief, the Digital Samba System uses and provides a method that does not require transmission of a complete audio and video file from the user front end. Rather, on information and belief, a stream of

audio and video material is transmitted to the servers of the Digital Samba System as the audio and video material is being captured.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

The screenshot shows the Digital Samba dashboard with a sidebar on the left containing navigation options: Rooms, Sessions, Team, Roles, Recordings (selected), Webhooks, Tokens, Statistics, and Documentation. The main content area is titled 'Recordings' and displays a table with the following data:

Title	Room	Started (UTC)	Duration	Author	
Recording 22.03.2024 09:15	111KcVjIbbV8105	Mar 22, 2024 09:15:40	1 min	skdnc	...
Recording 22.03.2024 09:11	aaQ5qnUI6HmZlh	Mar 22, 2024 09:11:30	2 mins	alex	...

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

85. On information and belief, Digital Samba uses and provides a method wherein the audio and video recordings are made and stored on the host back end as a complete file.

This is a duplicate of the screenshot above, showing the Digital Samba dashboard with the 'Recordings' section active. The table lists two recordings with their respective room names, start times, durations, and authors.

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

86. On information and belief, Digital Samba uses and provides a method wherein after the recording of audio and video material is complete, Digital Samba provides access to the entire audio and video recording.

87. On information and belief, Digital Samba directly infringes at least claim 1 of the '068 patent, and is in violation of 35 U.S.C. § 271(a) by using and providing Digital Samba.

88. On information and belief, Digital Samba has been on notice of the '068 patent at least as early as April 24, 2024, when its counsel, Josep Carbonell, responded to Onstream's April 4, 2024 letter concerning Digital Samba's infringement of the patents-in-suit.

89. On information and belief, at least since April 24, 2024, Digital Samba knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '068 patent, including by Digital Samba's actions that include, without limitation, instructing and encouraging its customers to use the Digital Samba System through the publishing, distribution, and propagation of user guides, support documents, blog posts, live events, streaming API's, and instructions, including but not limited to the examples of such materials cited above.

90. On information and belief, at least since acquiring its April 2024 knowledge of the '068 patent, Digital Samba knows that the acts it induced its customers to take constitute patent infringement and Digital Samba's encouraging acts result in direct infringement of one or more claims of the '068 patent by its customers.

91. On information and belief, Digital Samba's customers directly infringe

at least claim 1 of the '068 patent through their use of the Digital Samba System.

92. On information and belief, Digital Samba is in violation of 35 U.S.C. § 271(b) and has been, at least since its April 2024 knowledge of the '068 patent, indirectly infringing and continues to indirectly infringe at least claim 1 of the '068 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Digital Samba's users) and possessing specific intent to encourage infringement by Digital Samba's users. The components of the Digital Samba System are specifically configured to function in accordance with the '068 patent claims, are material parts of the invention.

93. Digital Samba's direct and indirect infringement has damaged Onstream and caused it to suffer and continue to suffer irreparable harm and damages.

Count II - Infringement of United States Patent No. 9,467,728

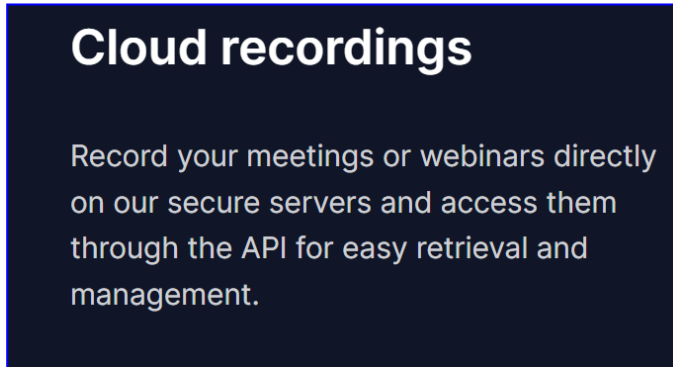
94. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

95. On information and belief, Digital Samba (or those acting on its behalf) makes, uses, sells and/or offers to sell the Digital Samba System in the United States. Digital Samba, as well as the Digital Samba System, infringes (literally and/or under the doctrine of equivalents) at least claim 1 of the '728 patent.

96. On information and belief, Digital Samba employs and provides an Internet based method that records audio and video material over an Internet browser connection established between a user front end and a host back end.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

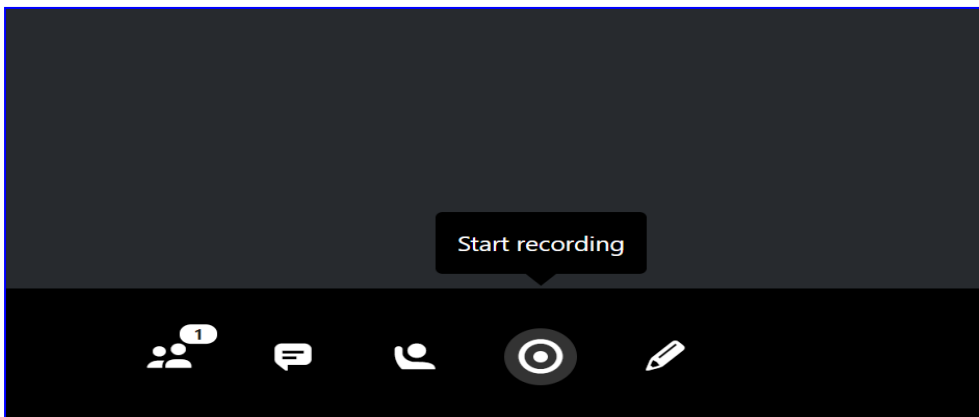
See e.g., <https://www.digitalsamba.com/tech-specs>



Cloud recordings

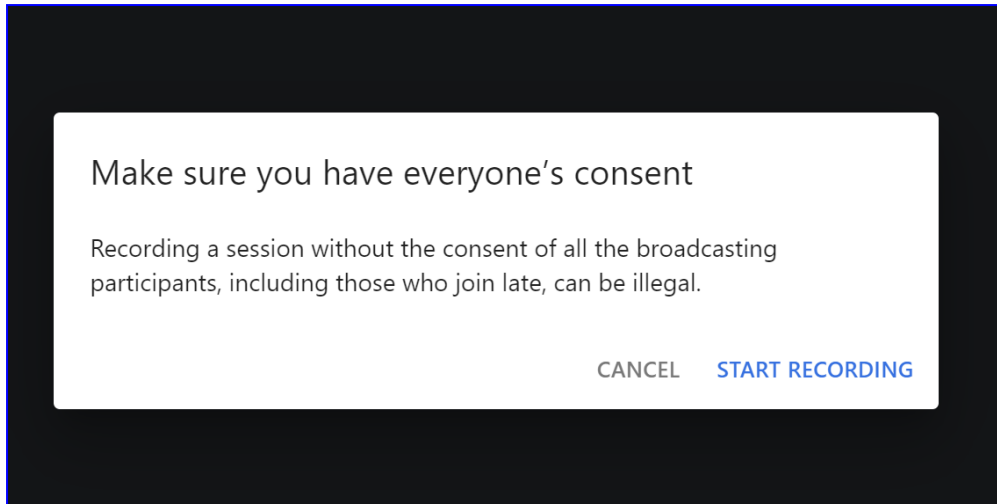
Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

See e.g., <https://www.digitalsamba.com/features>

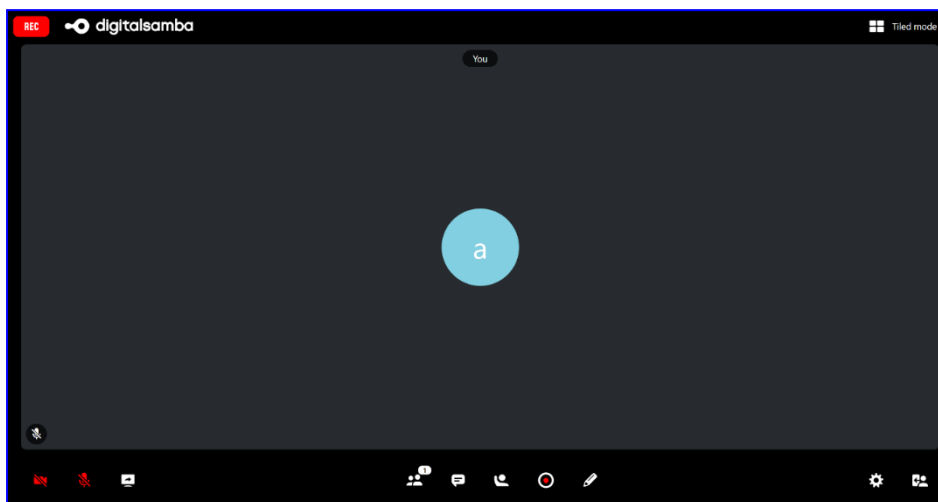


A screenshot of a recording interface. At the top center, there is a dark button labeled "Start recording". Below this, a dark horizontal bar contains five white icons: a group of people with a notification bubble, a speech bubble, a person icon, a target icon, and a pencil icon.

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

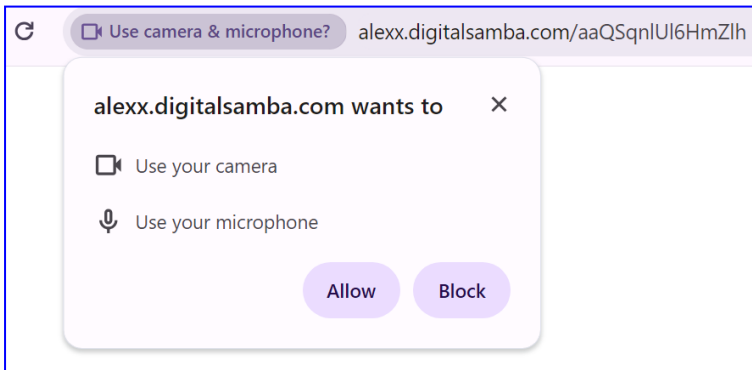


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

97. On information and belief, the Digital Samba System, including particularly and without limitation the servers of the Digital Samba System, transmit via a network a platform independent web application, which initiates the streaming of audio and video material from a user's device as the audio and video material is being captured by that device.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

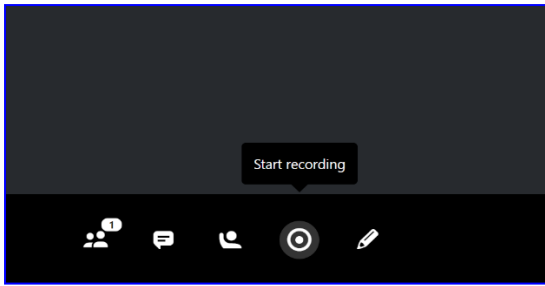


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room)

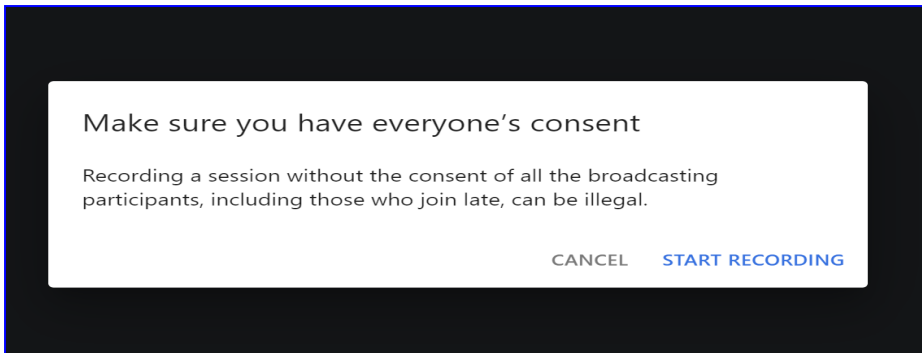
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

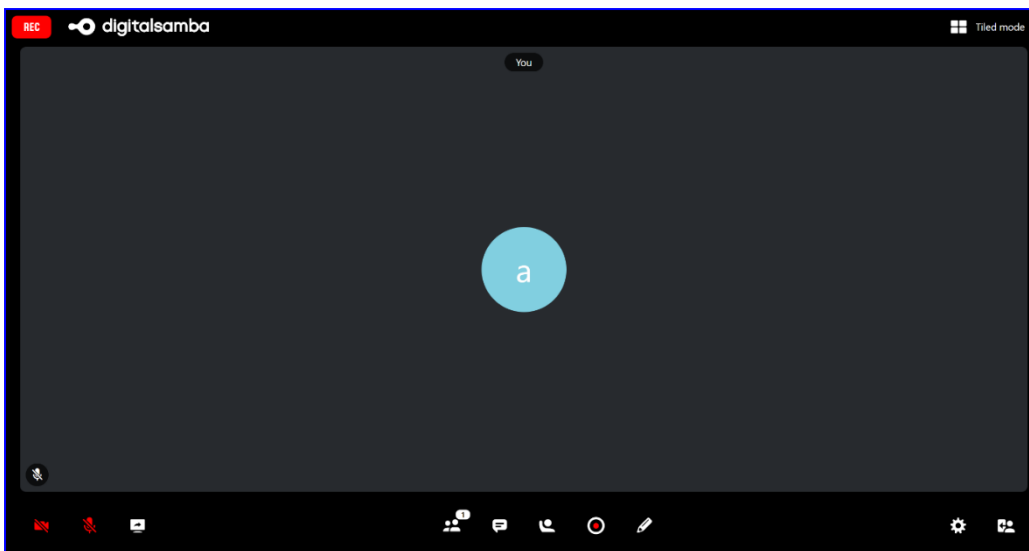
See e.g., <https://www.digitalsamba.com/features>



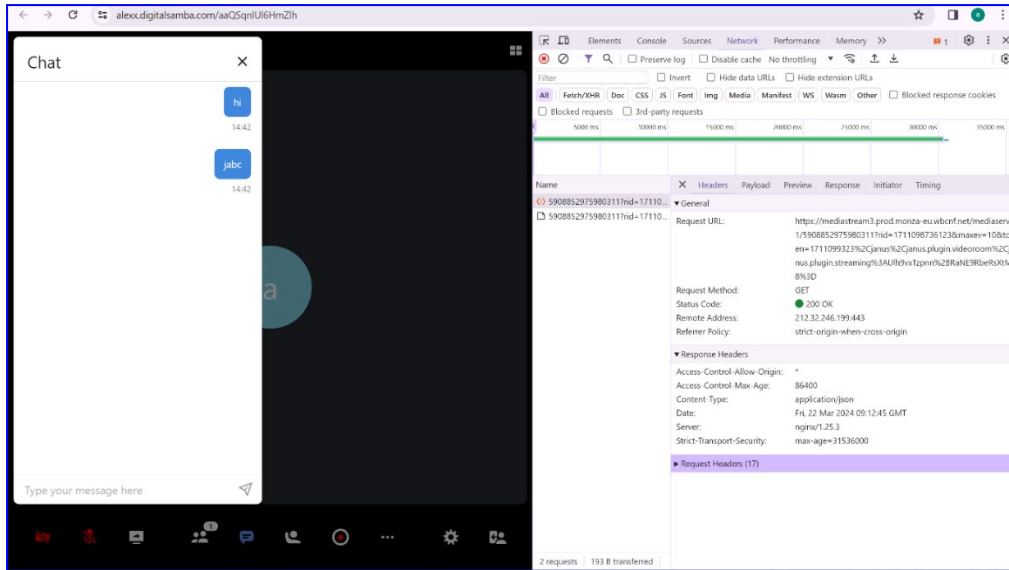
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



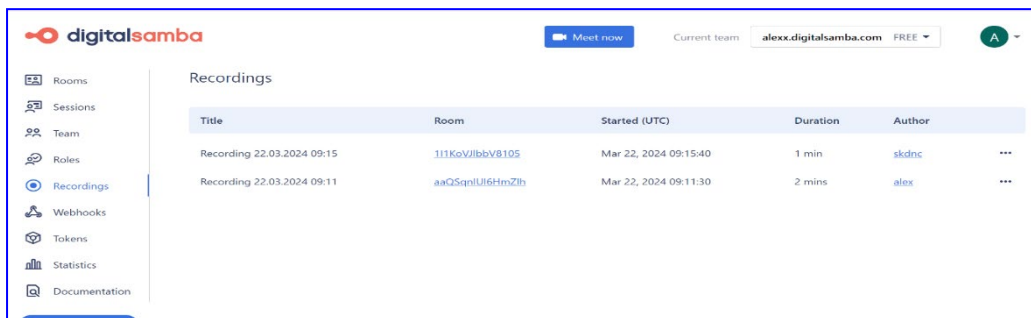
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

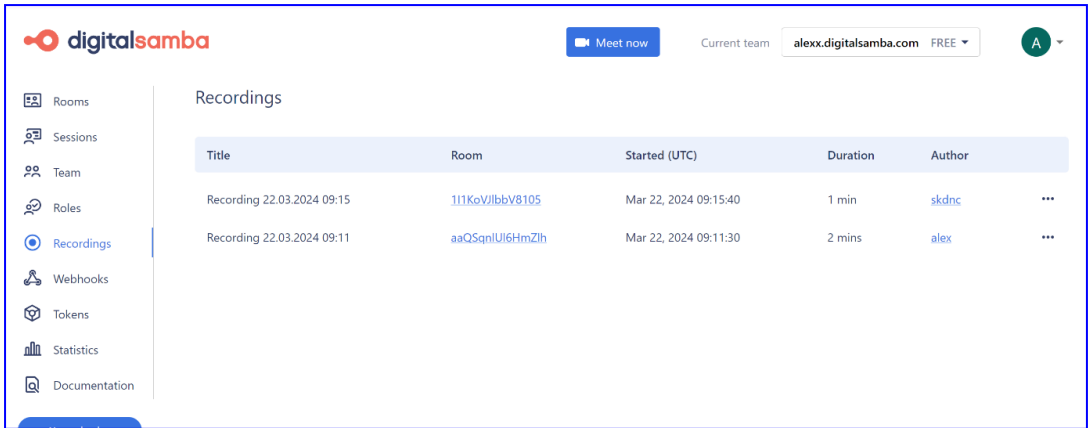


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

98. On information and belief, the Digital Samba System records audio and video material on the Digital Samba System’s servers via a web application and stores that audio and video material as a complete file.

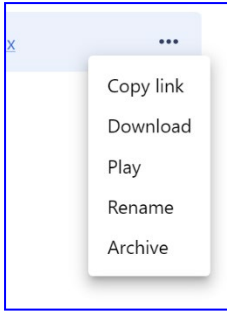


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

99. On information and belief, the Digital Samba System generates one or more codes including but not limited to Universal Resource Locator (URL) and Hyper Text Mark-Up Language (HTML) codes, which are associated with the recorded and stored audio and video, to facilitate accessing the recorded and stored audio and video material from an additional location, such as a location from which another user of the Digital Samba System is accessing the recorded and stored audio and video material.

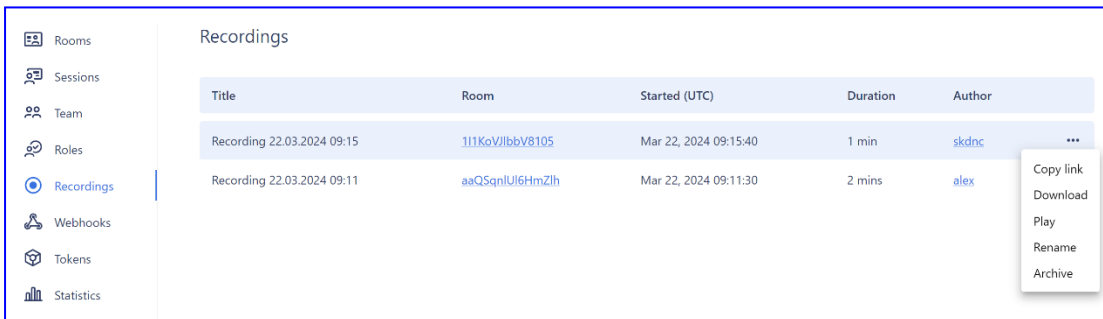


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

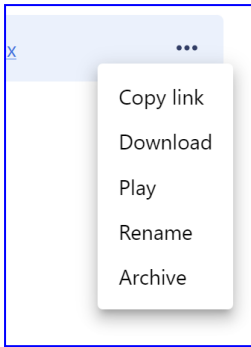


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

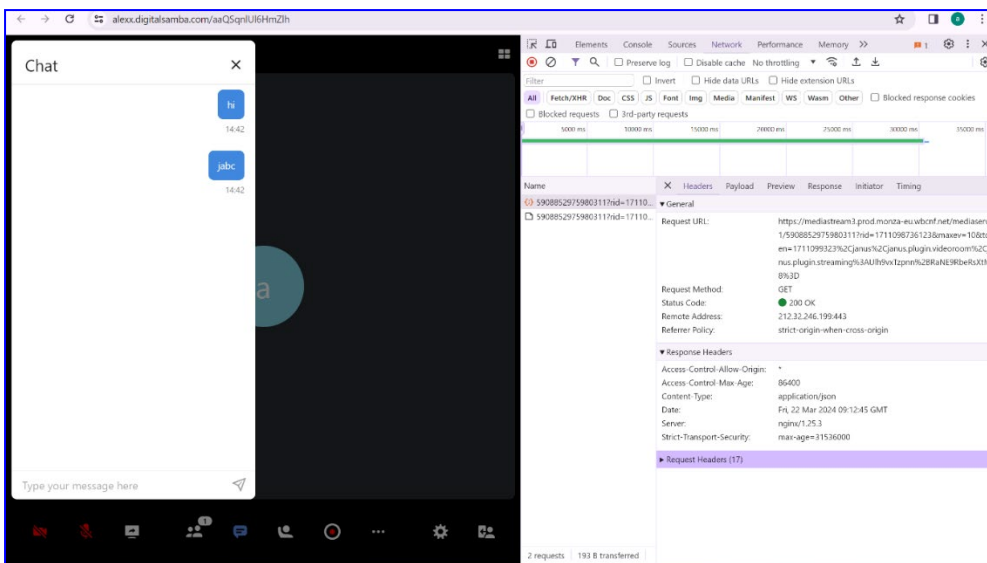
100. On information and belief, the content of the one or more codes generated by the Digital Samba System depends on the type of code supported by the additional location. On information and belief, the content of the one or more codes generated by the Digital Samba system depends on, among other things, the data transfer protocols that are supported by the client and/or device from which another user of the Digital Samba System is accessing the audio and video material.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

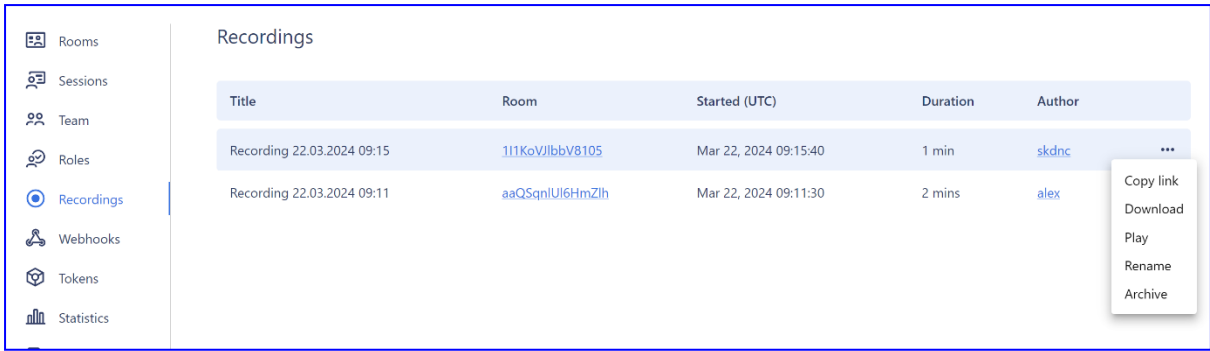


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

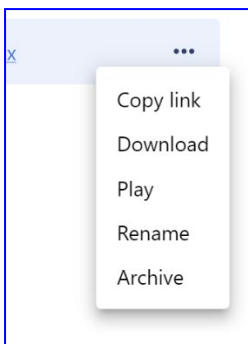


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

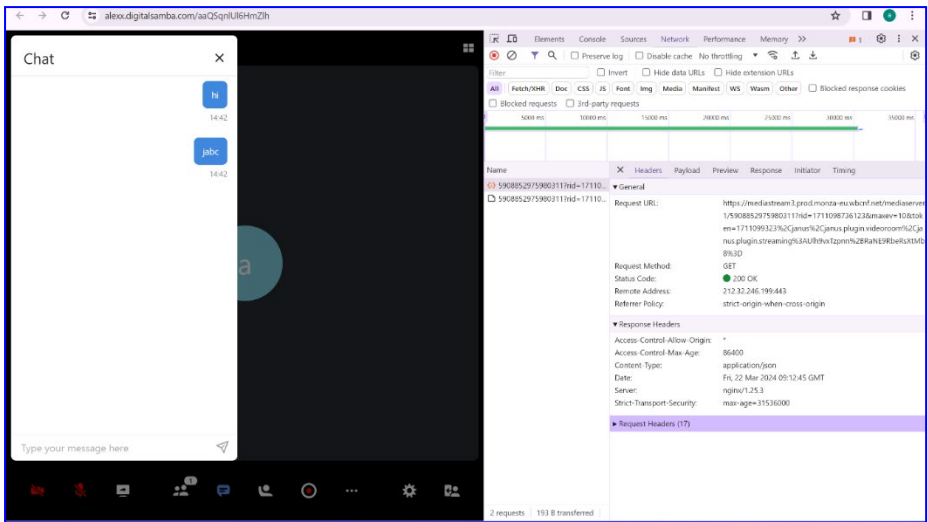
101. On information and belief, Digital Samba enables the copying and pasting of codes associated with the recorded and stored audio and video material, including but not limited to URL and HTML codes, to additional locations, wherein the activation of such a code provides access to the recorded audio and video from additional locations.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

102. On information and belief, Digital Samba directly infringes at least

claim 1 of the '728 patent, and is in violation of 35 U.S.C. § 271(a) by using and providing the Digital Samba System.

103. On information and belief, Digital Samba has been on notice of the '728 patent at least as early as April 24, 2024, when its counsel, Josep Carbonell, responded to Onstream's April 4, 2024 letter concerning Digital Samba's infringement of the patents-in-suit.

104. On information and belief, at least since April 24, 2024, Digital Samba knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '728 patent, including by Digital Samba's actions that include, without limitation, instructing and encouraging its customers to use the Digital Samba System through the publishing, distribution, and propagation of user guides, support documents, blog posts, live events, streaming API's, and instructions, including but not limited to the examples of such materials cited above.

105. On information and belief, at least since acquiring its April 2024 knowledge of the '728 patent, Digital Samba knows that the acts it induced its customers to take constitute patent infringement and Digital Samba's encouraging acts result in direct infringement of one or more claims of the '728 patent by its customers.

106. On information and belief, Digital Samba's customers directly infringe at least claim 1 of the '728 patent through their use of the Digital Samba System.

107. On information and belief, Digital Samba is in violation of 35 U.S.C. § 271(b) and has been, at least since its April 2024 knowledge of the '728 patent, indirectly infringing and continues to indirectly infringe at least claim 1 of the '728

patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Digital Samba's users) and possessing specific intent to encourage infringement by Digital Samba's users. The components of the Digital Samba System are specifically configured to function in accordance with the '728 patent claims, are material parts of the invention.

108. Digital Samba's direct and indirect infringement has damaged Onstream and caused it to suffer and continue to suffer irreparable harm and damages.

Count III - Infringement of United States Patent No. 10,038,930

109. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

110. On information and belief, Digital Samba (or those acting on its behalf) made, used, sold and/or offered to sell the Digital Samba System in the United States. Digital Samba, as well as the Digital Samba System, infringed (literally and/or under the doctrine of equivalents) at least claim 1 of the '930 patent.

111. On information and belief, Digital Samba employed and provided a method that transmits via a network a browser-independent recording application from the servers of the Digital Samba System to the devices used by the users of the Digital Samba System.

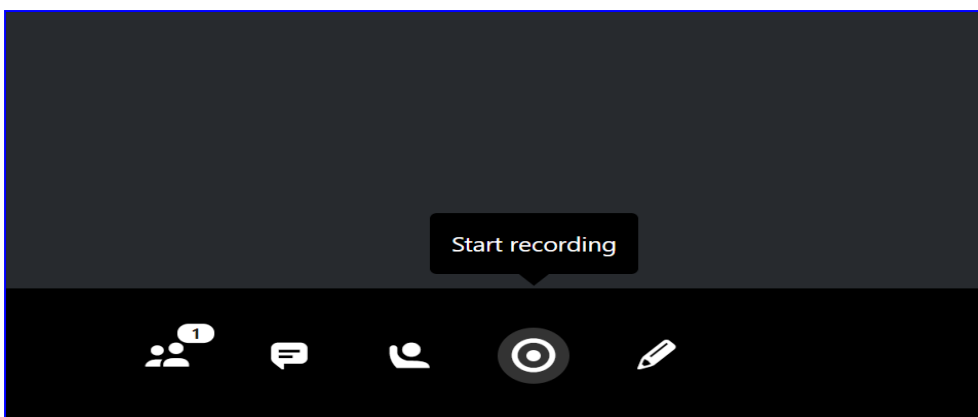
Windows	Mac	Linux
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.

See e.g., <https://www.digitalsamba.com/tech-specs>

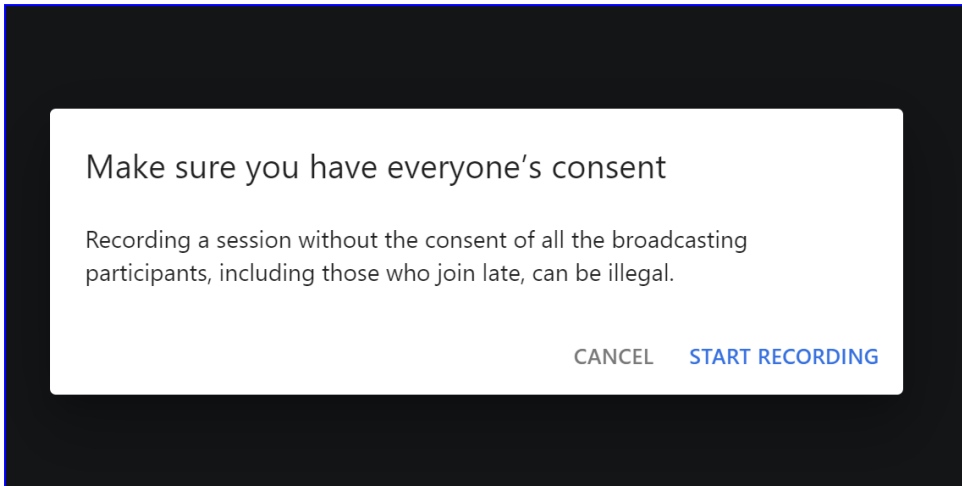
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

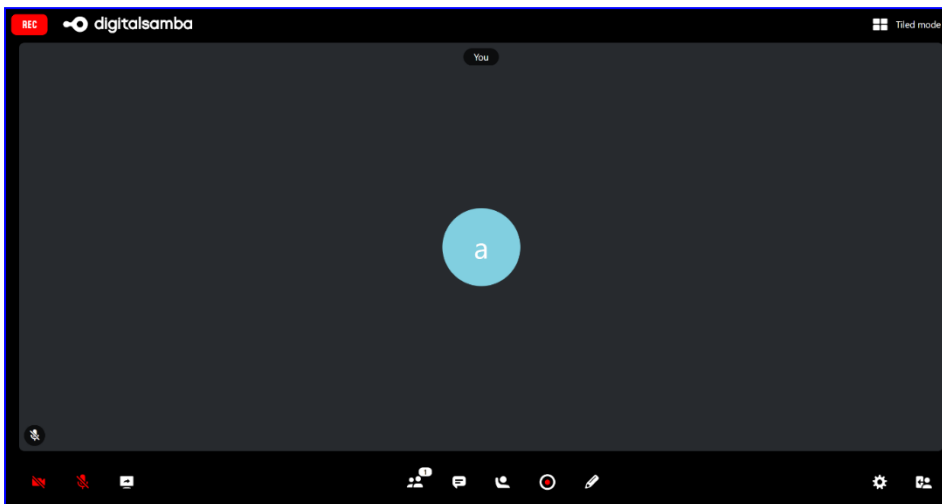
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

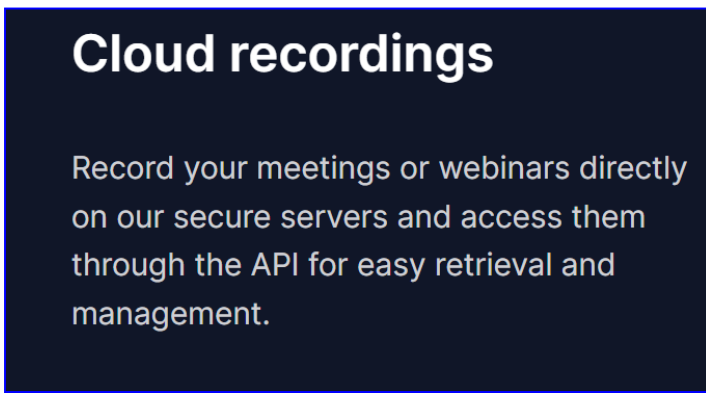


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

112. On information and belief, the media streams that were transmitted to the servers of the Digital Samba System were captured by Digital Samba's browser-independent recording applications, which were executed in a browser.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

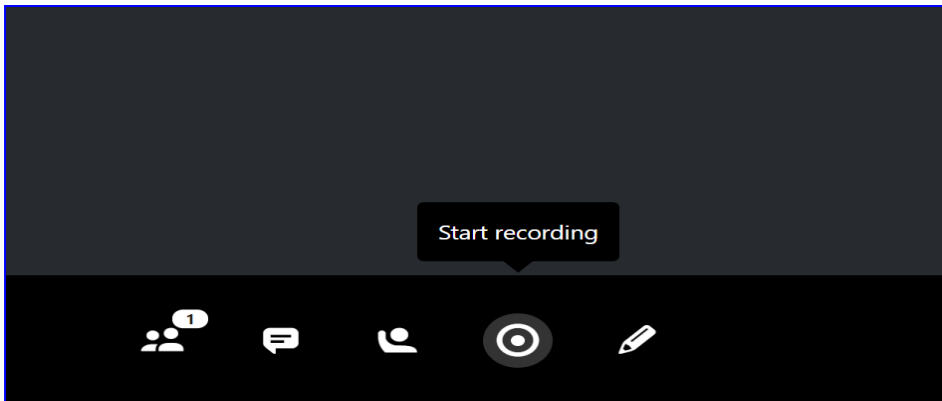
See e.g., <https://www.digitalsamba.com/tech-specs>



Cloud recordings

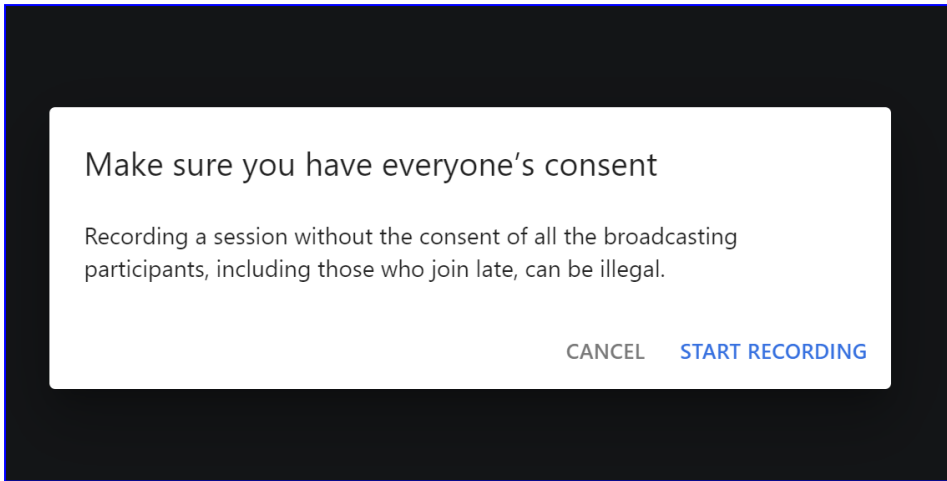
Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

See e.g., <https://www.digitalsamba.com/features>

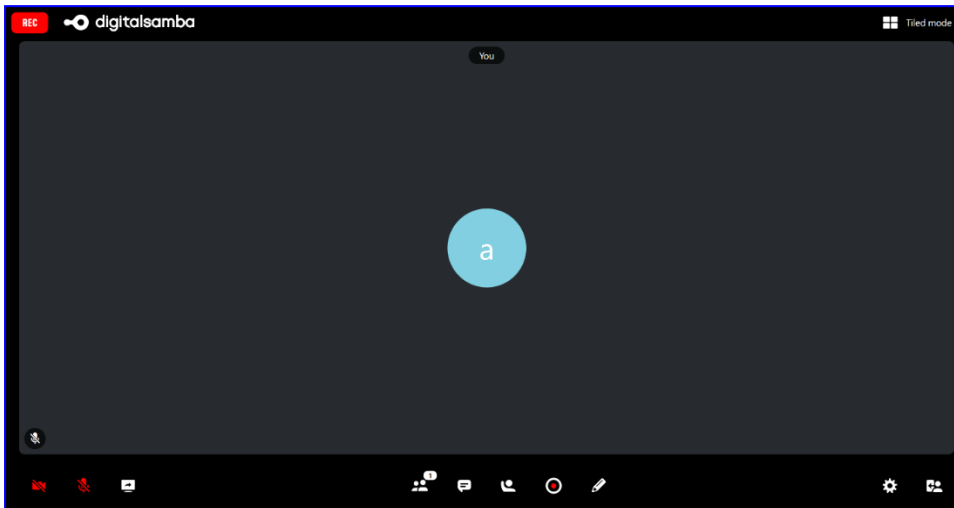


A screenshot of a recording interface. At the top, there is a dark grey bar with a white button labeled "Start recording". Below this bar is a dark grey navigation bar containing five white icons: a group of people with a speech bubble, a speech bubble, a person icon, a target icon, and a pencil icon.

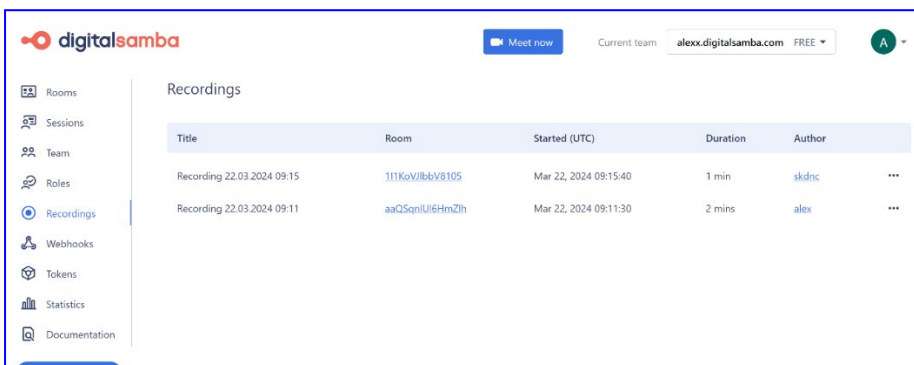
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



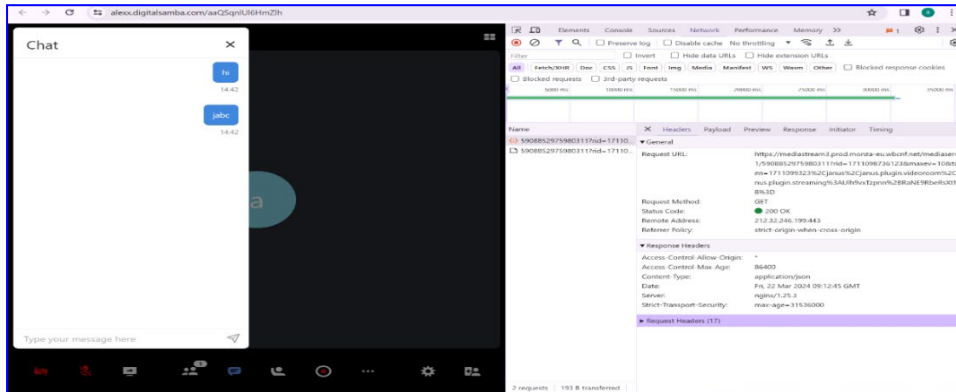
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

113. On information and belief, Digital Samba did not require the installation of record management software to be installed on the devices used by their users to access Digital Samba System.

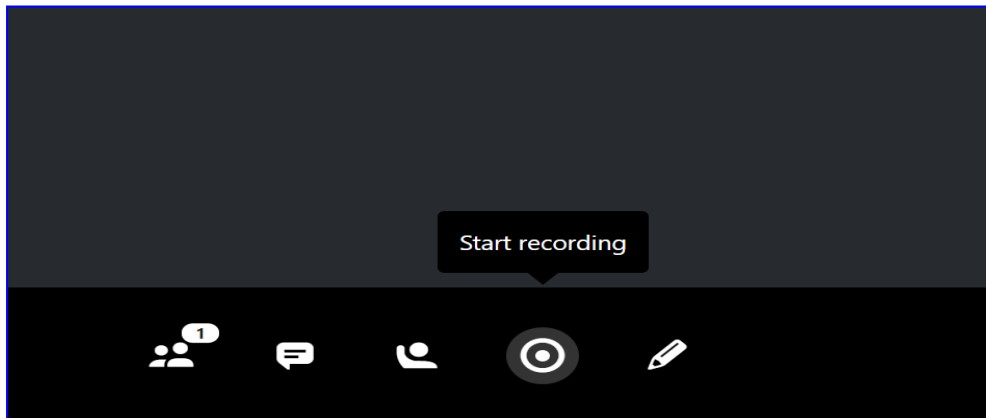
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

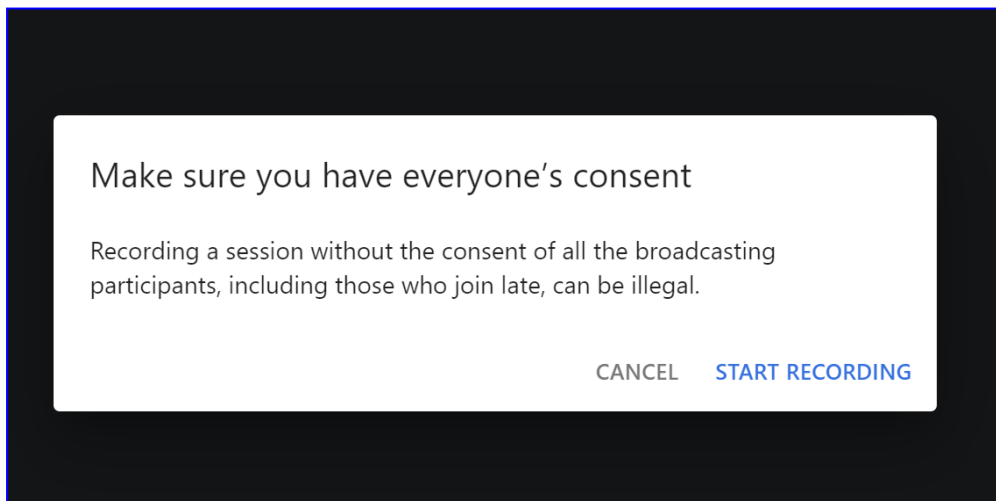
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

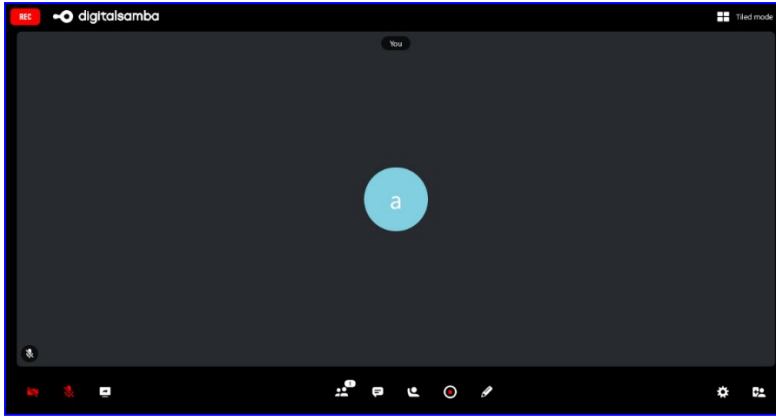
See e.g., <https://www.digitalsamba.com/features>



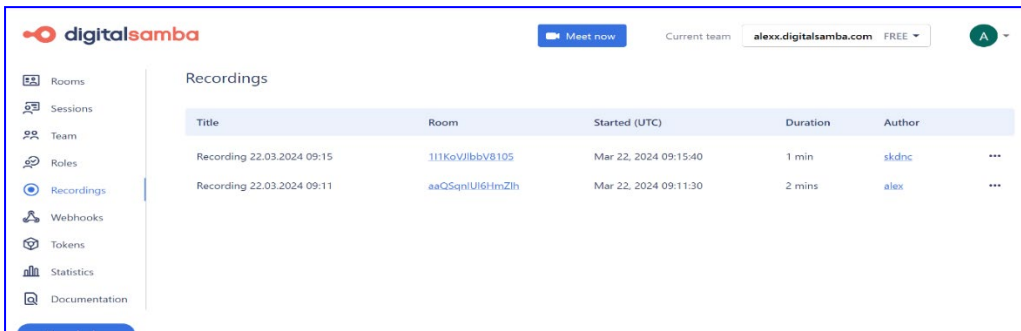
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



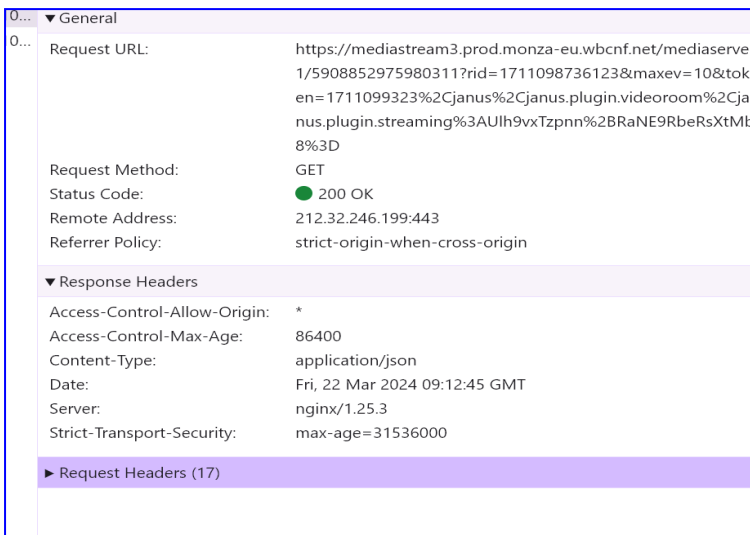
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



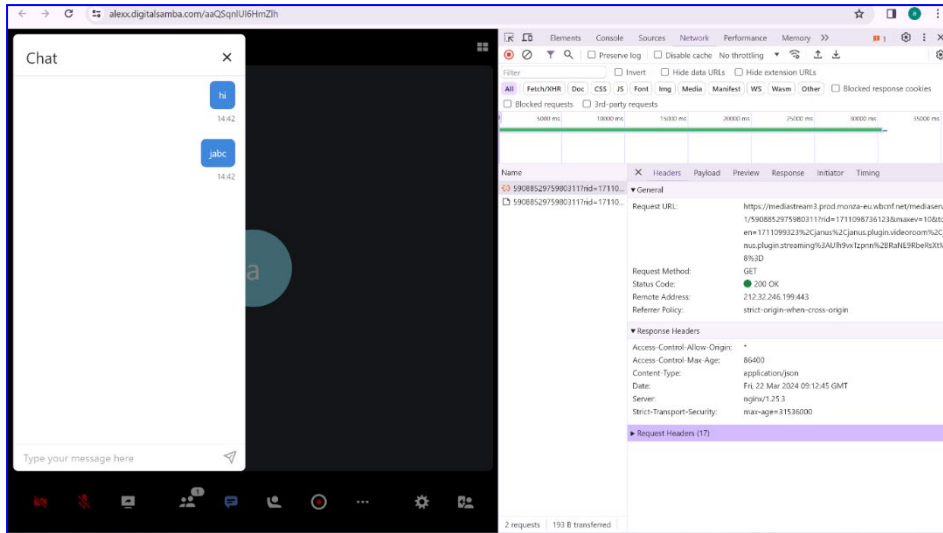
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

114. On information and belief, the media streams generated by the users of the Digital Samba System were recorded on the servers of the Digital Samba System using a browser-independent recording application.

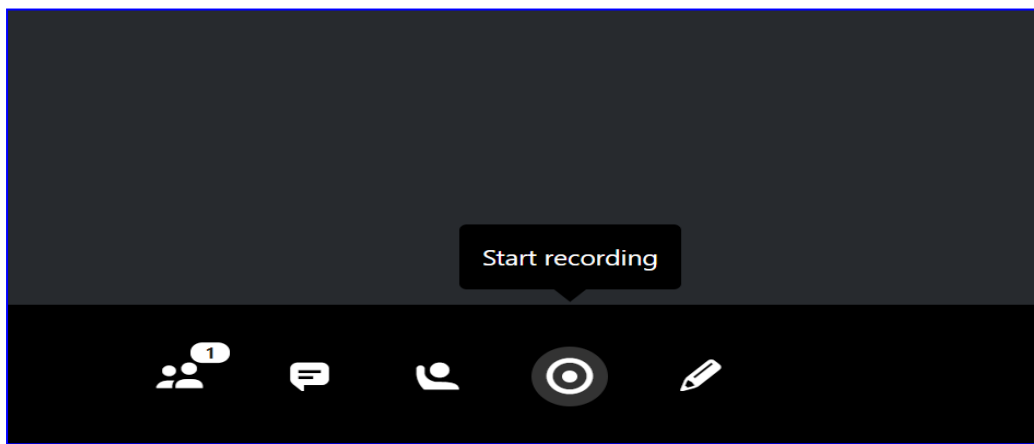
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

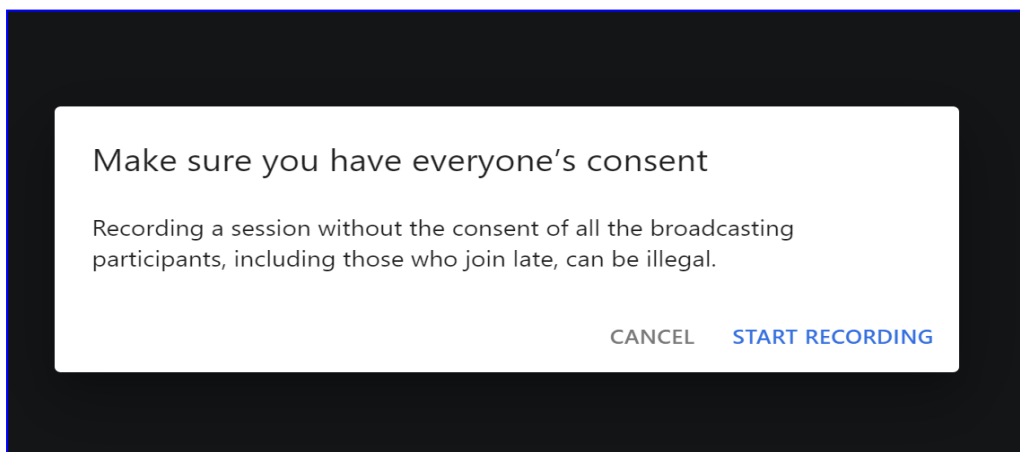
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

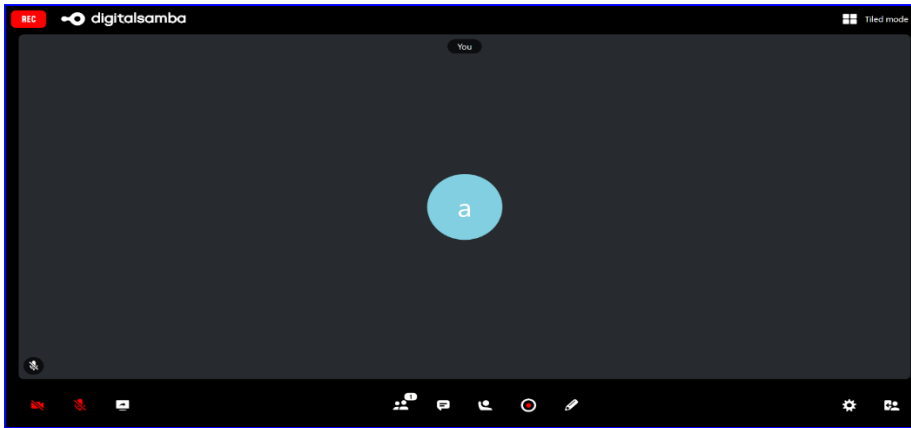
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

115. On information and belief, Digital Samba directly infringed at least claim 1 of the '930 patent, and violated 35 U.S.C. § 271(a) by having made, used, sold and/or offered to sell the Digital Samba System.

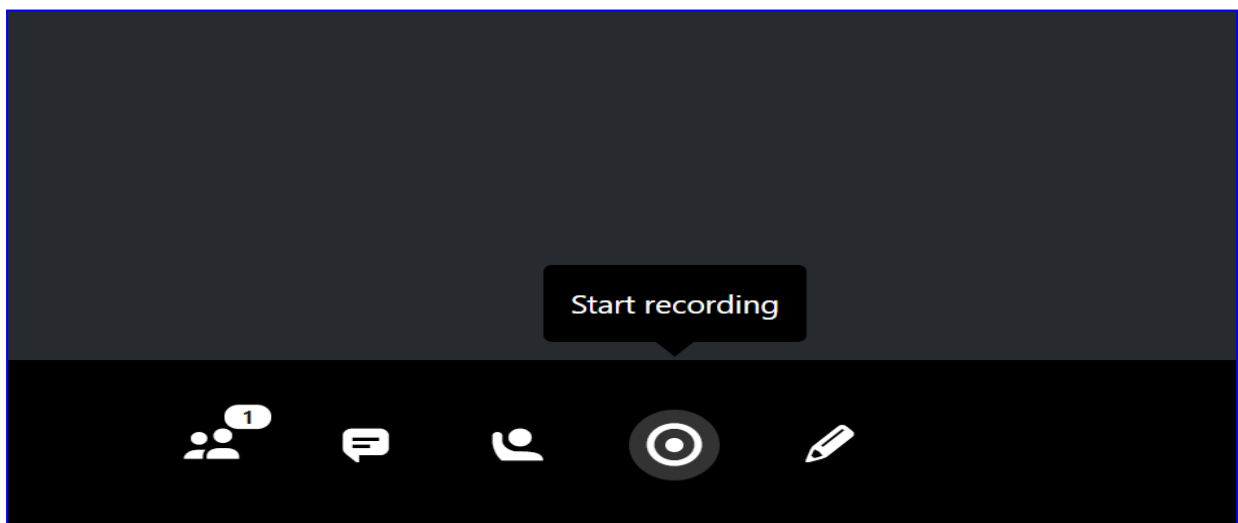
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

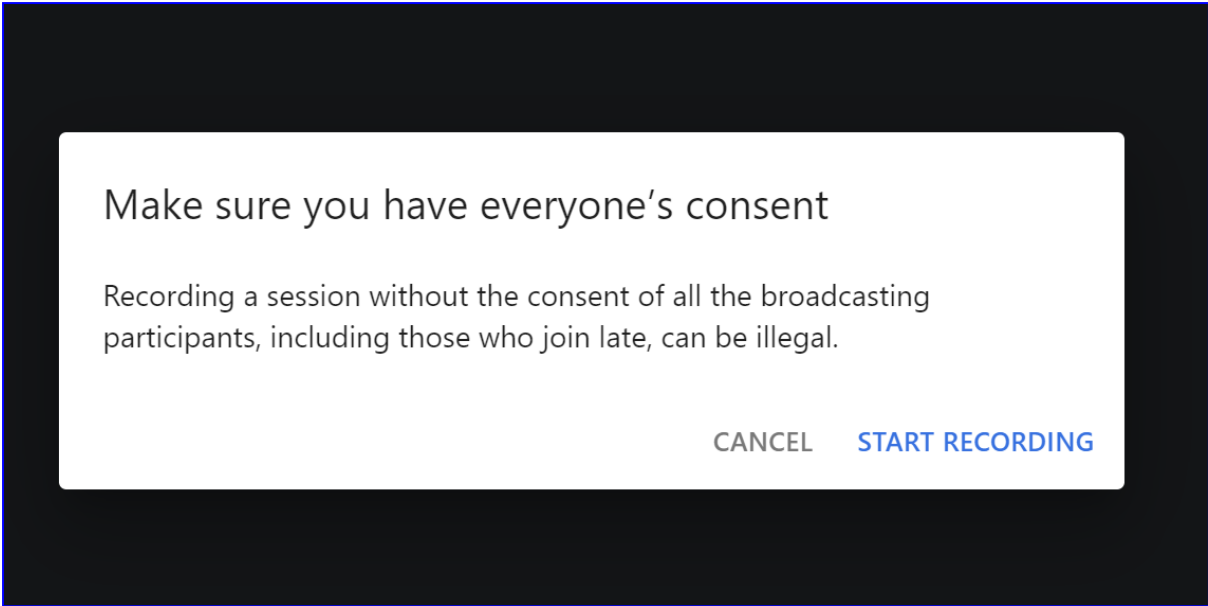
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

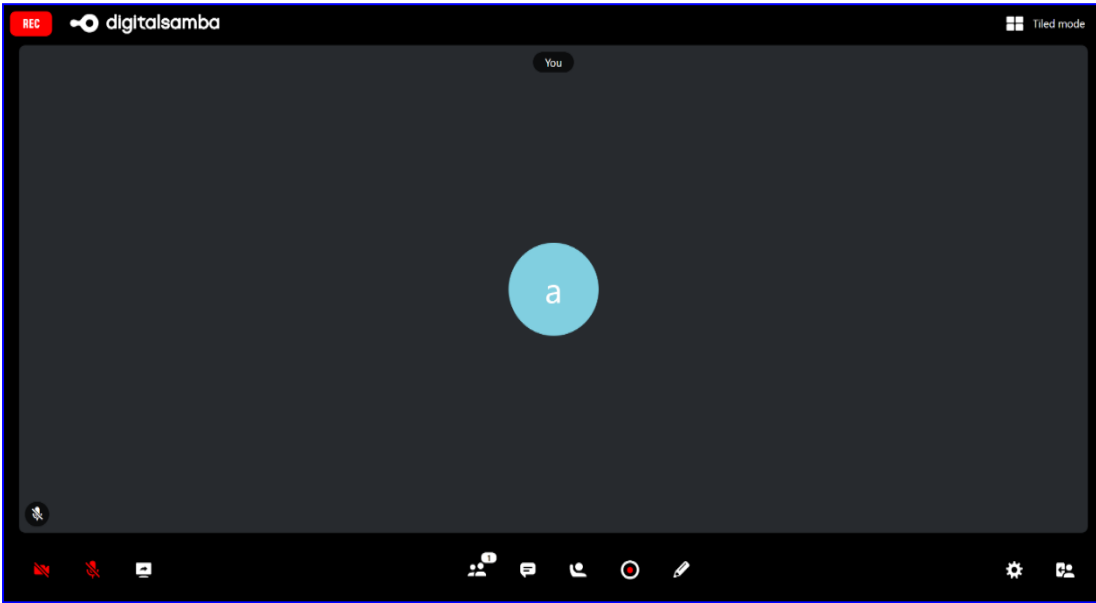
See e.g., <https://www.digitalsamba.com/features>



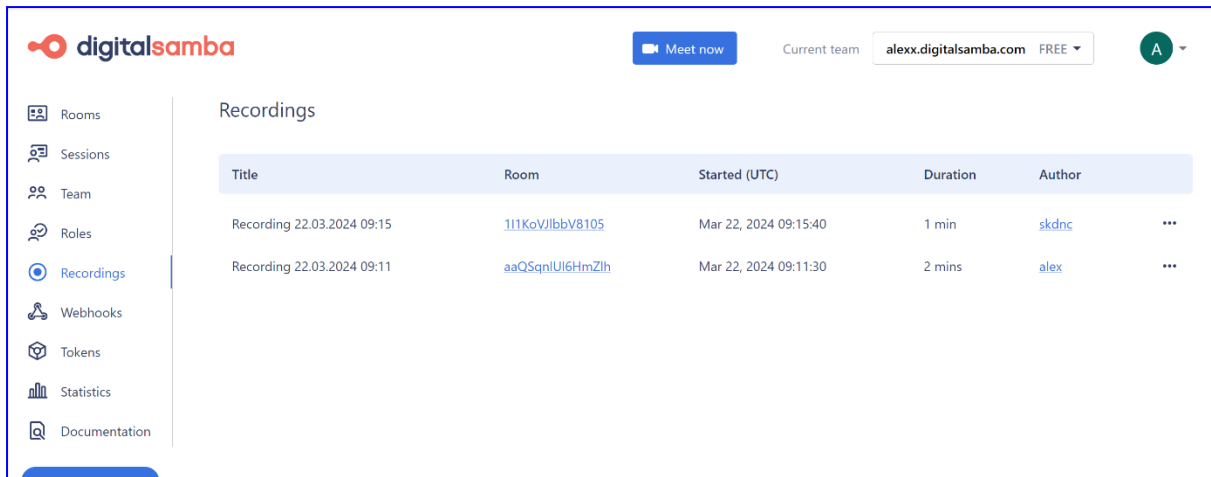
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



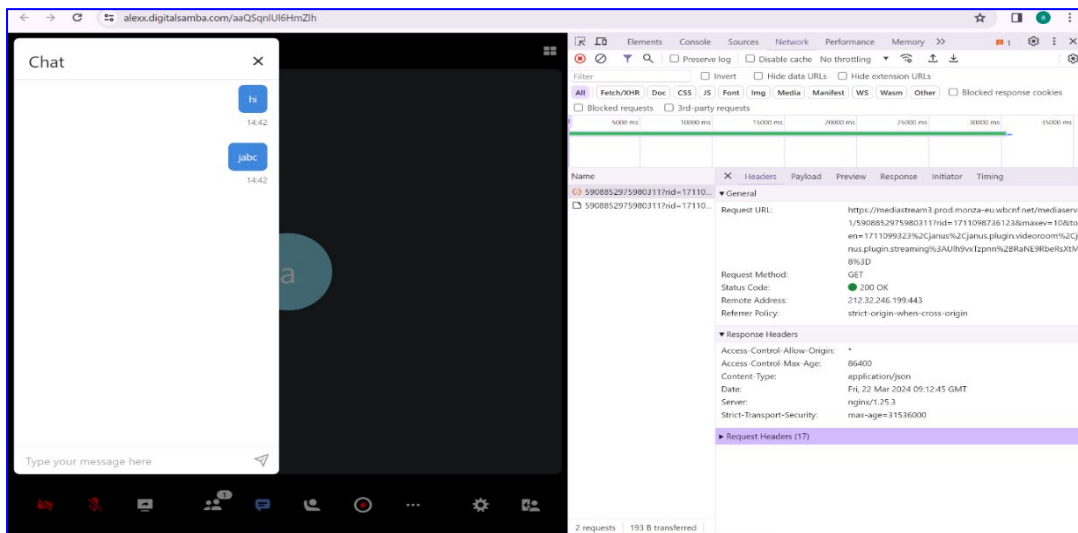
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

116. On information and belief, Digital Samba has been on notice of the '930 patent at least as early as April 24, 2024, when its counsel, Josep Carbonell, responded to Onstream's April 4, 2024 letter concerning Digital Samba's infringement of the patents-in-suit.

117. On information and belief, at least since April 24, 2024, Digital Samba knowingly encouraged its customers to directly infringe one or more claims of the

'930 patent, including by Digital Samba's actions that included, without limitation, instructing and encouraging its customers to use the Digital Samba System through the publishing, distribution, and propagation of user guides, support documents, blog posts, live events, streaming API's, and instructions, including but not limited to the examples of such materials cited above.

118. On information and belief, at least since acquiring its April 2024 knowledge of the '930 patent, Digital Samba knew that the acts it induced its customers to take constituted patent infringement and Digital Samba's encouraging acts resulted in direct infringement of one or more claims of the '930 patent by its customers.

119. On information and belief, Digital Samba's customers directly infringed at least claim 1 of the '930 patent through their use of the Digital Samba System.

120. On information and belief, Digital Samba was in violation of 35 U.S.C. § 271(b) at least since its April 2024 knowledge of the '930 patent, and indirectly infringed at least claim 1 of the '930 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Digital Samba's users) and possessing specific intent to encourage infringement by Digital Samba's users. The components of the Digital Samba System were specifically configured to function in accordance with the '930 patent claims and were material parts of the invention.

121. Digital Samba's direct and indirect infringement damaged Onstream and caused it to suffer irreparable harm and damages.

Count IV - Infringement of United States Patent No. 10,200,648

122. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

123. On information and belief, Digital Samba (or those acting on its behalf) made, used, sold and/or offered to sell the Digital Samba System in the United States. Digital Samba, as well as the Digital Samba System, infringed (literally and/or under the doctrine of equivalents) at least claim 1 of the '648 patent.

124. On information and belief, Digital Samba employed and provided an Internet based recording method that performed its audio and video recording functions over an Internet browser connection established between a user front end and a host back end.

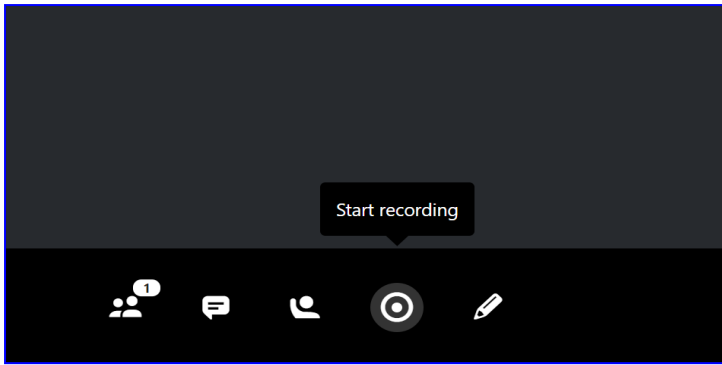
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

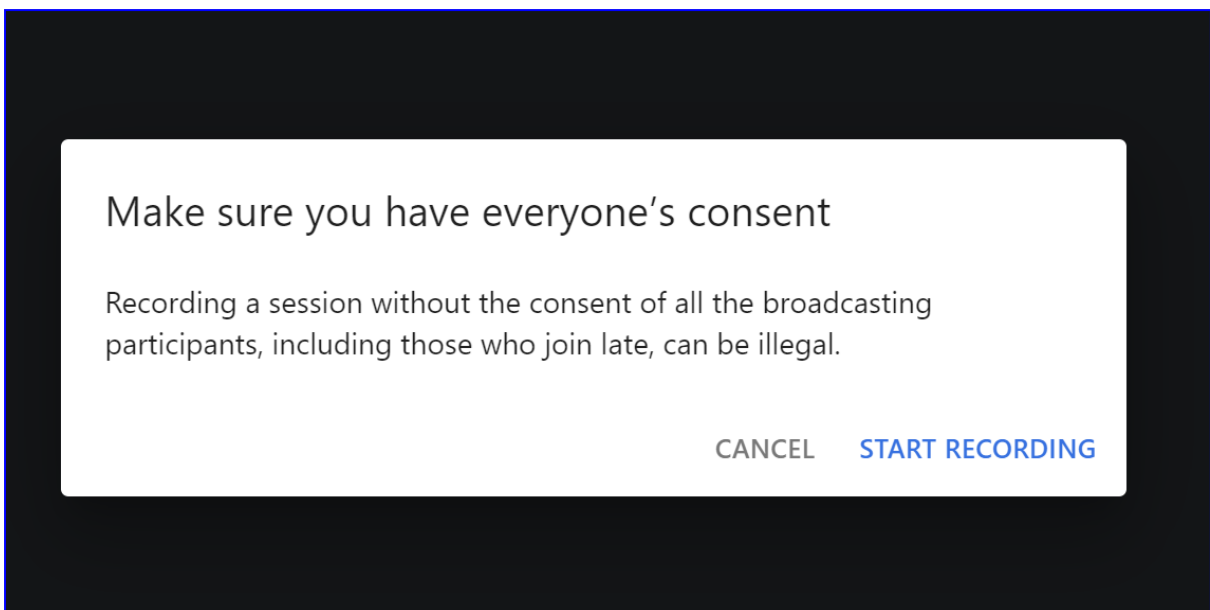
Cloud recordings

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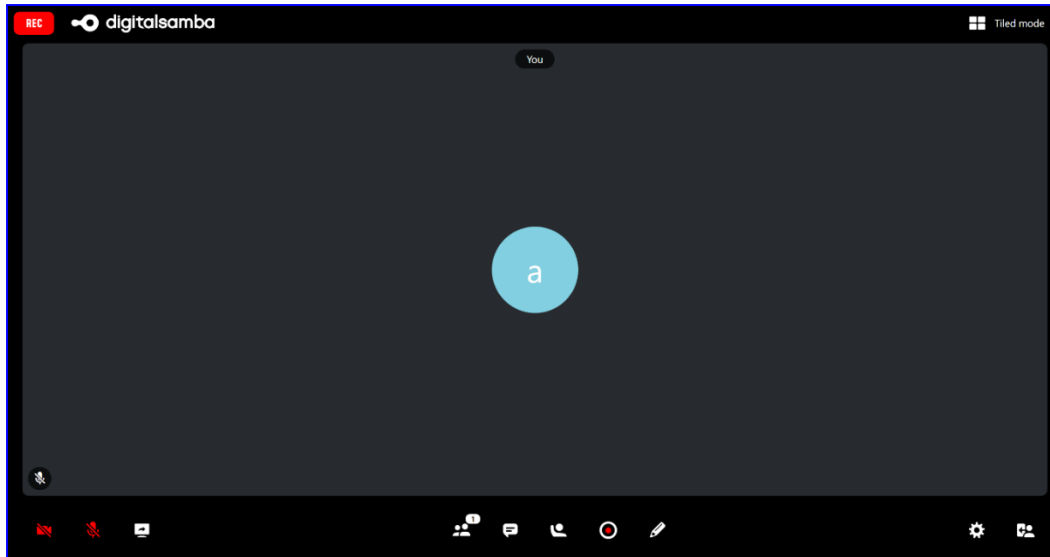
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

125. On information and belief, Digital Samba recorded audio and video material that was created by a user over an Internet browser connection, without requiring recording functionality to be present in the user’s device.

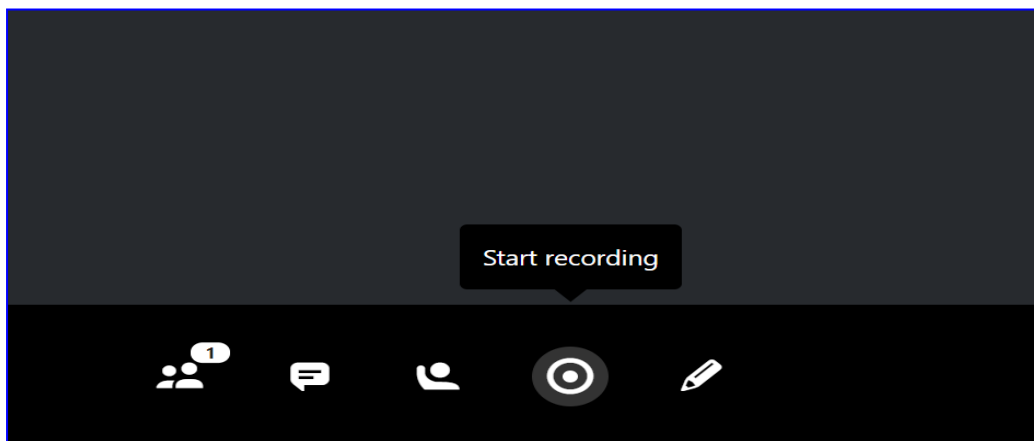
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

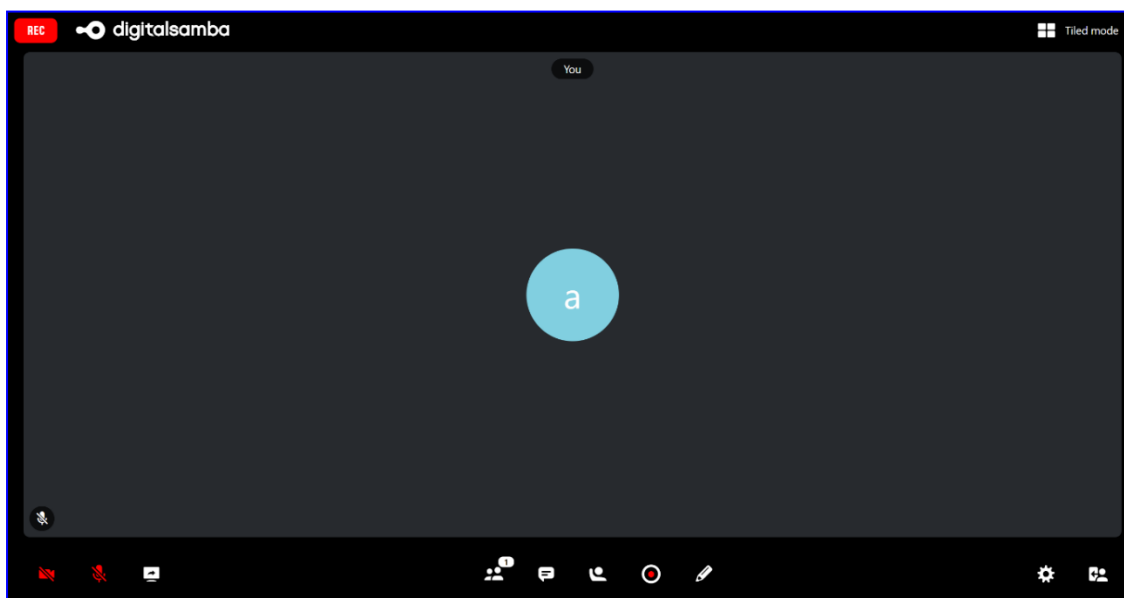
Cloud recordings

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See e.g., <https://www.digitalsamba.com/features>

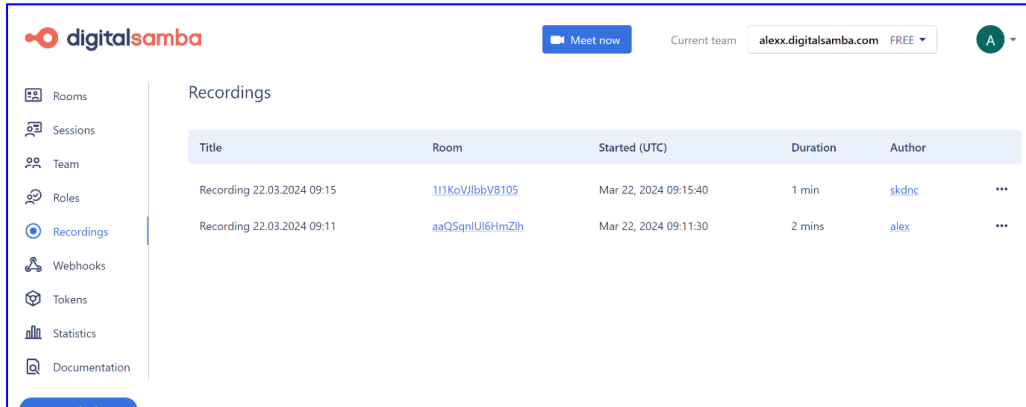


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

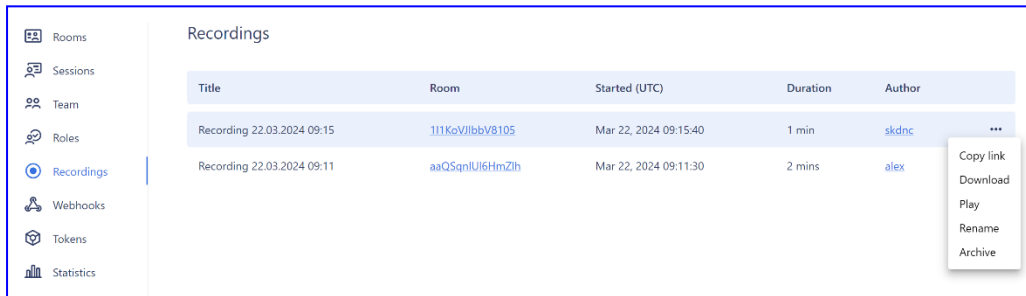


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

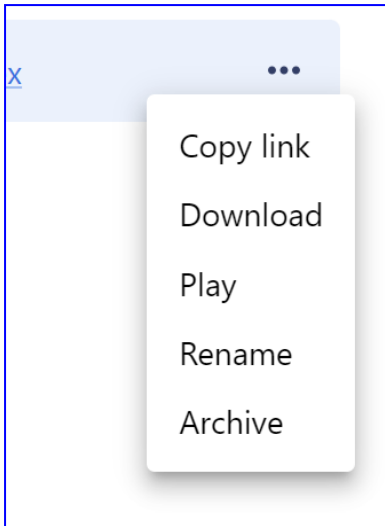
126. On information and belief, Digital Samba System generated one or more codes, including but not limited to URL and HTML codes, associated with the recorded and stored audio and video, to facilitate accessing the recorded and stored audio and video material.



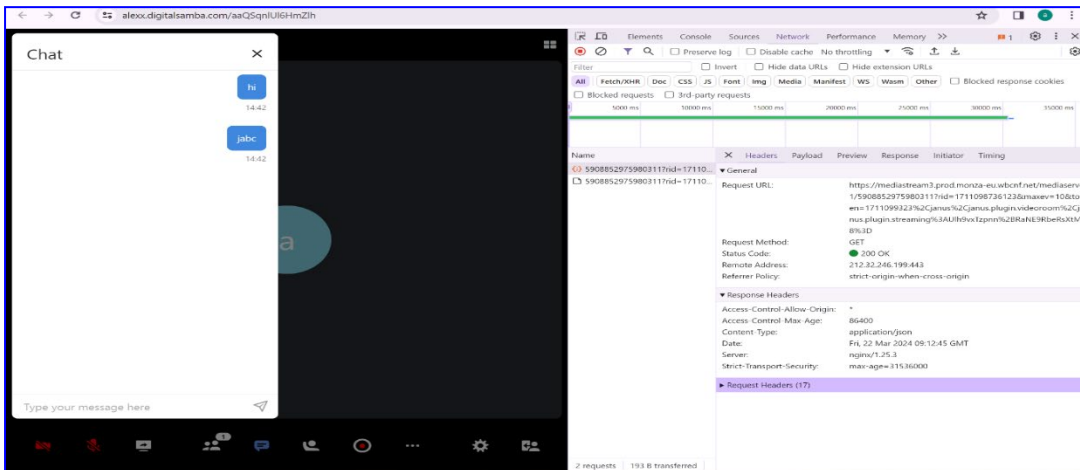
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

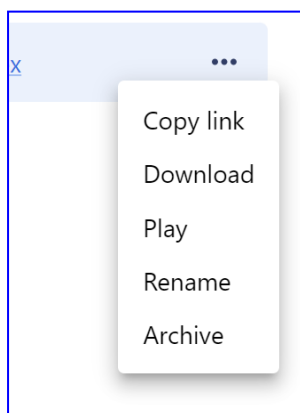
127. On information and belief, the Digital Samba system enabled the copying and pasting of code, including but not limited to URL and HTML codes, to additional locations, wherein the activation of such a code provided access to the

recorded audio and video from additional locations.

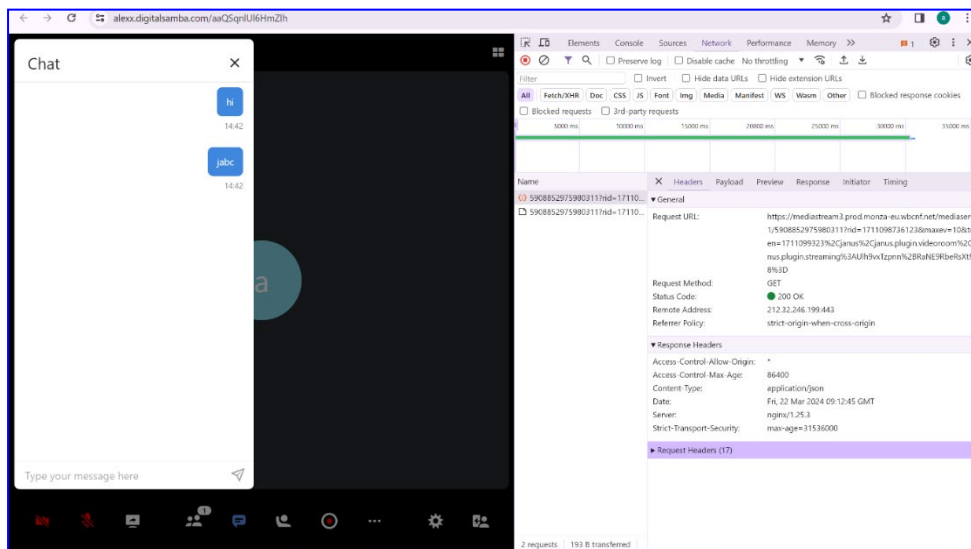


Title	Room	Started (UTC)	Duration	Author	
Recording 22.03.2024 09:15	111KoVJlbbV8105	Mar 22, 2024 09:15:40	1 min	skdnc	...
Recording 22.03.2024 09:11	aaQ5qnlUI6HmZlh	Mar 22, 2024 09:11:30	2 mins	alex	Copy link Download Play Rename Archive

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



The screenshot displays a chat interface on the left with messages "hi" and "jabc" at 14:42. On the right, the network developer tool shows a request to `https://mediastream3.prod.monza.eu.sbconf.net/mediaserver/1/59088529/59802117hd=17110...` with a 200 OK status. The response headers include `Access-Control-Allow-Origin: *`, `Content-Type: application/json`, and `Date: Fri, 22 Mar 2024 09:12:45 GMT`.

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

128. On information and belief, Digital Samba directly infringed at least claim 1 of the '648 patent, and violated 35 U.S.C. § 271(a) by using and providing the Digital Samba System.

129. On information and belief, Digital Samba has been on notice of the '648 patent at least as early as April 24, 2024, when its counsel, Josep Carbonell, responded to Onstream's April 4, 2024 letter concerning Digital Samba's infringement of the patents-in-suit.

130. On information and belief, at least since April 24, 2024, Digital Samba knowingly encouraged its customers to directly infringe one or more claims of the '648 patent, including by Digital Samba's actions that included, without limitation, instructing and encouraging its customers to use the Digital Samba System through the publishing, distribution, and propagation of user guides, support documents, blog posts, live events, streaming API's, and instructions, including but not limited to the examples of such materials cited above.

131. On information and belief, at least since acquiring its April 2024 knowledge of the '648 patent, Digital Samba knew that the acts it induced its customers to take constitute patent infringement and Digital Samba's encouraging acts resulted in direct infringement of one or more claims of the '648 patent by its customers.

132. On information and belief, Digital Samba's customers directly infringed at least claim 1 of the '648 patent through their use of the Digital Samba System.

133. On information and belief, Digital Samba was in violation of 35 U.S.C. § 271(b) at least since its April 2024 knowledge of the '648 patent and indirectly infringed at least claim 1 of the '648 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Digital Samba's users) and possessed specific intent to encourage infringement by Digital Samba's users. The components of the Digital Samba System were specifically configured to function in accordance with the '648 patent claims, are material parts of the invention.

134. Digital Samba's direct and indirect infringement damaged Onstream and caused it to suffer irreparable harm and damages.

Count V - Infringement of United States Patent No. 10,674,109

135. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

136. On information and belief, Digital Samba (or those acting on its behalf) made, used, sold and/or offered to sell the Digital Samba System in the United States. Digital Samba, as well as the Digital Samba System, infringed (literally and/or under the doctrine of equivalents) at least claim 1 of the '109 patent.

137. On information and belief, Digital Samba employed and provided a method comprising the step of transmitting, via a network, a browser-independent recording application from a server of the Digital Samba System to a client device used by a user of one or more of the Digital Samba System, the application executing in a browser on the client device.

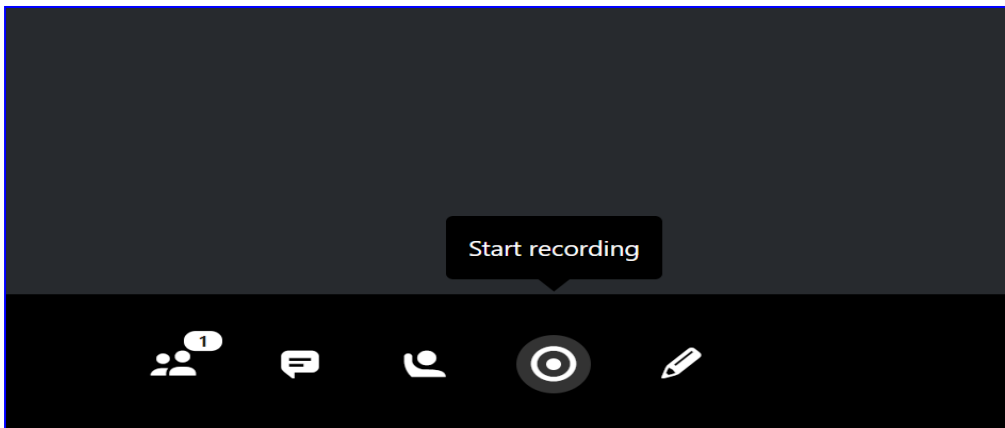
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

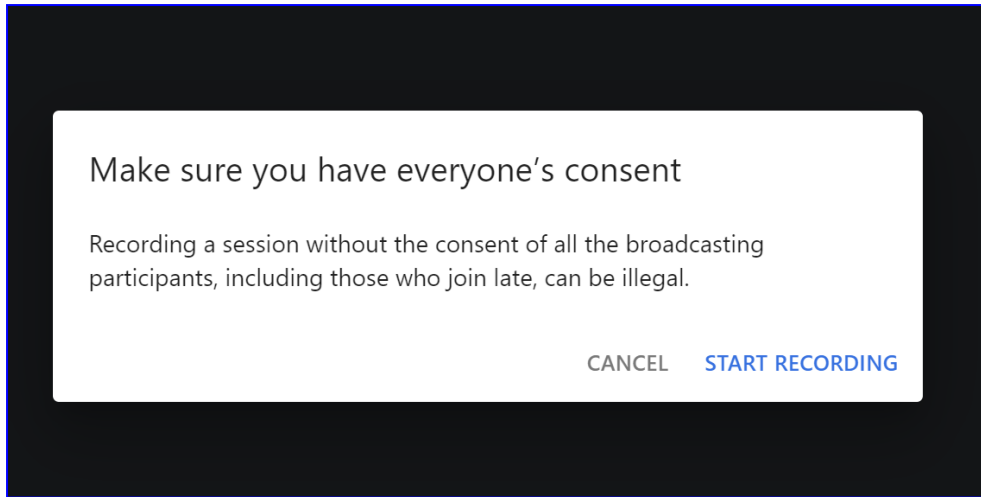
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

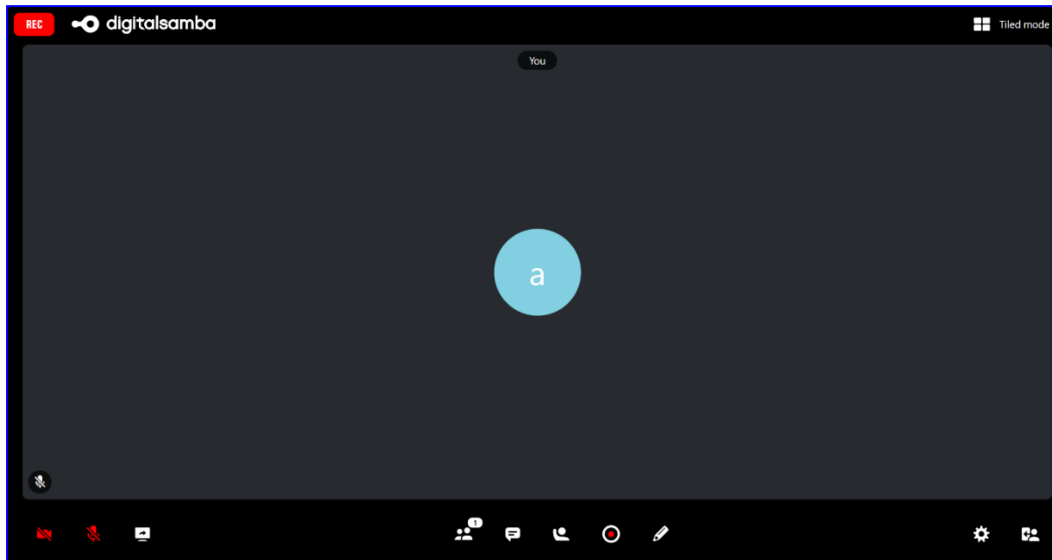
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

138. On information and belief, Digital Samba employed and provided a method comprising the step of receiving, at a server of the Digital Samba System, a media stream from a client device used by a user of the Digital Samba System via a network, wherein the media stream is captured via a browser-independent

recording application executing in a browser without using recording management software installed on the client device.

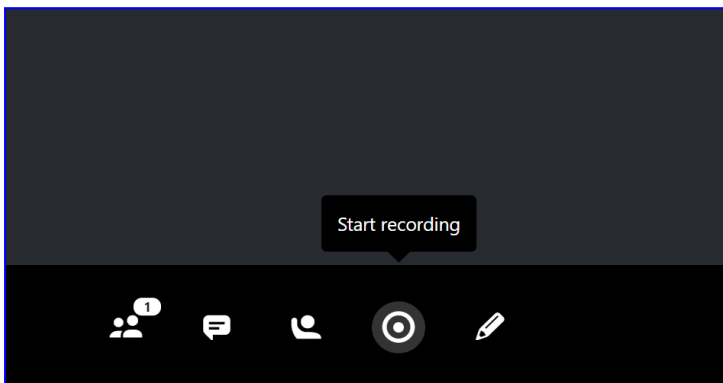
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

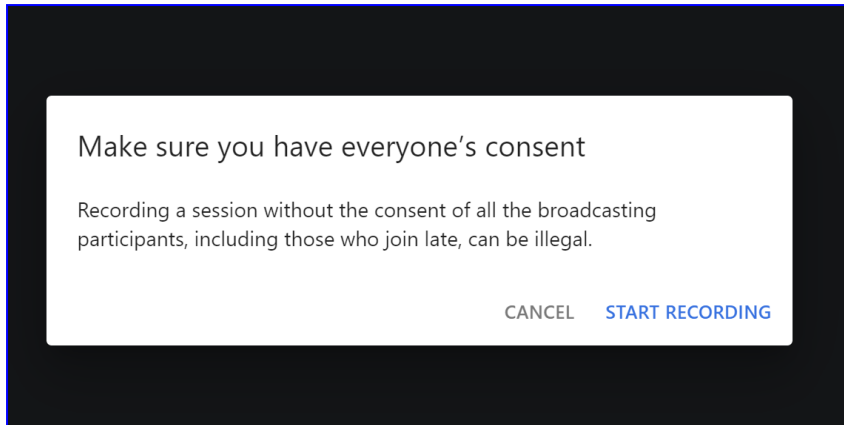
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

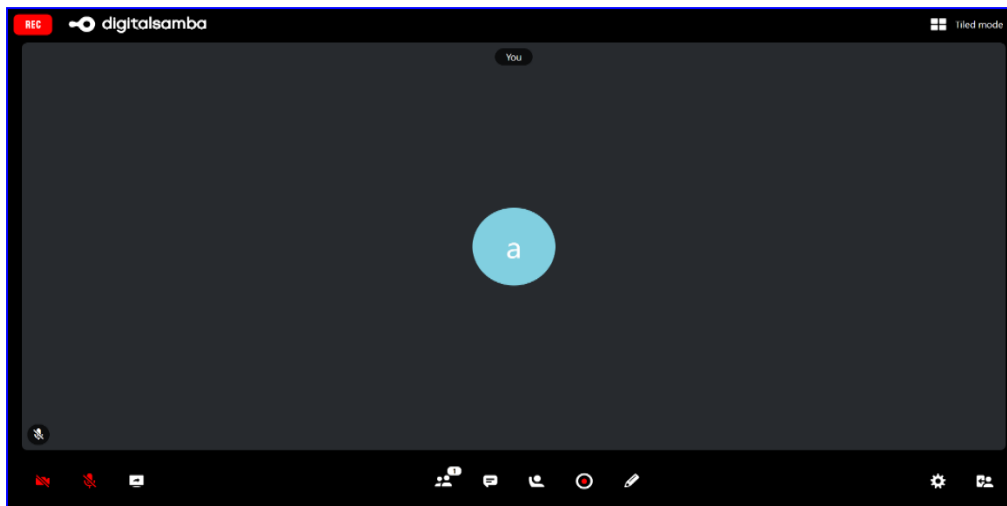
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

139. On information and belief, Digital Samba employed and provided a method comprising the step of recording the media stream on a server of the Digital Samba System using a browser-independent recording application.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

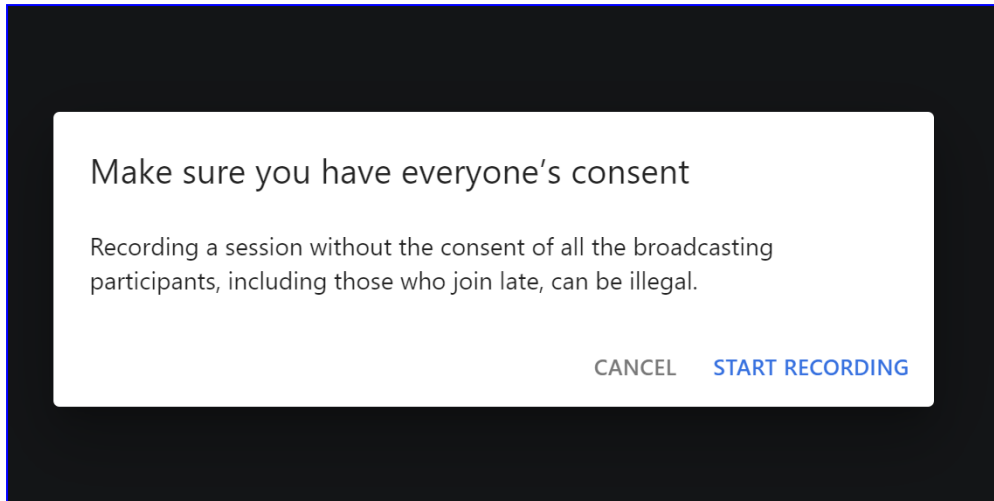
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

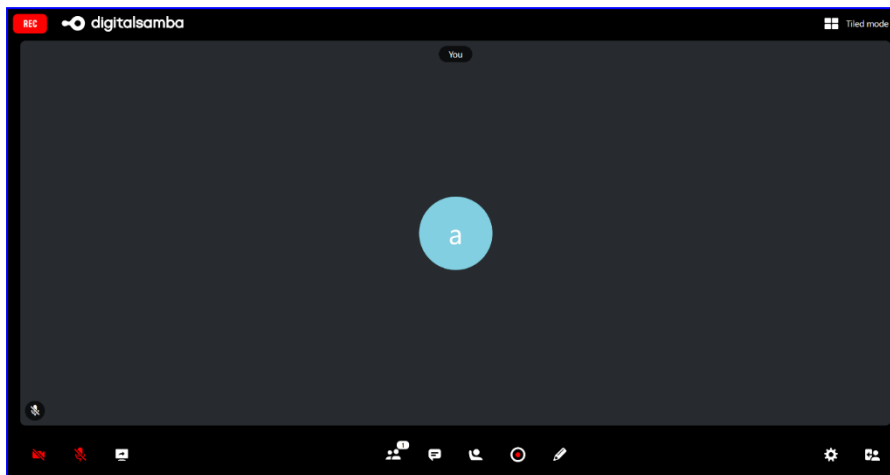
See e.g., <https://www.digitalsamba.com/features>

A screenshot of a meeting control interface. At the top, there is a dark grey bar with a white button labeled "Start recording". Below this is a black bar containing five white icons: a group of people with a "1" notification bubble, a speech bubble, a person icon, a target icon, and a pencil icon.

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

140. On information and belief, Digital Samba directly infringed at least claim 1 of the '109 patent, and violated 35 U.S.C. § 271(a) by using and providing the Digital Samba System.

141. Digital Samba's direct infringement has damaged Onstream and caused it to suffer irreparable harm and damages as a result of Digital Samba's infringement.

Count VI - Infringement of United States Patent No. 10,694,142

142. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

143. On information and belief, Digital Samba (or those acting on its behalf) made, used, sold and/or offered to sell the Digital Samba System in the United States.

144. Digital Samba, as well as the Digital Samba System, infringed (literally and/or under the doctrine of equivalents) at least claim 1 of the '142 patent.

145. On information and belief, the Digital Samba System employed and provided a method that records audio and video material over an Internet connection established between a user front end and a host back end.

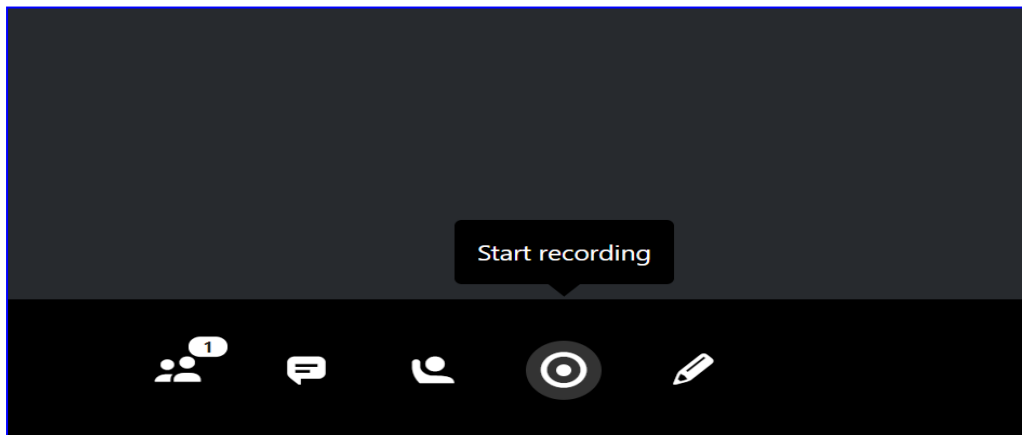
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

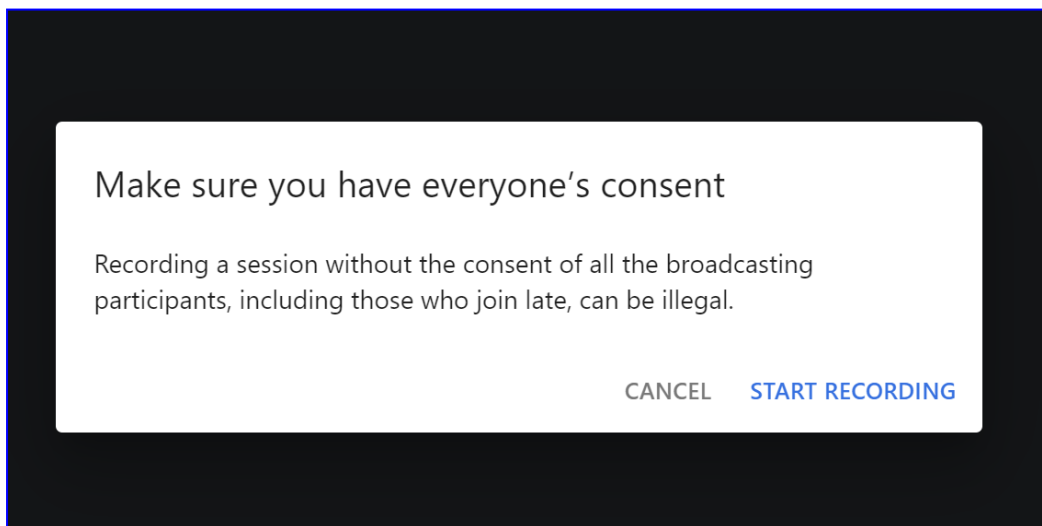
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

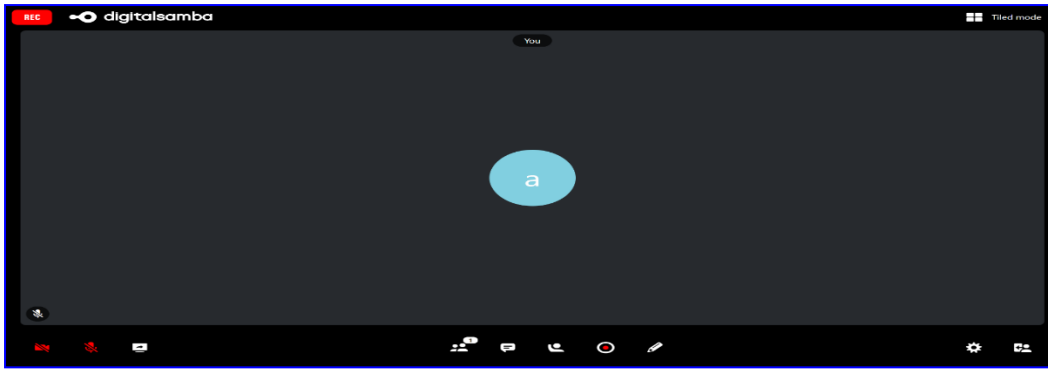
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

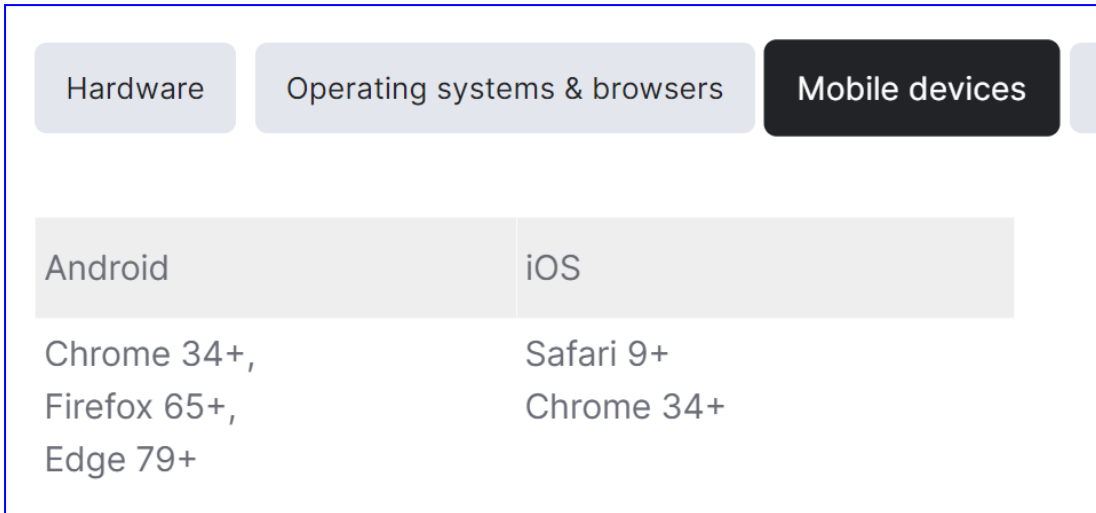
Hardware				Operating systems & browsers				Mobile devices				Bandwidth				Ports			
Audio				Video				Video (HQ and resolution)				Screen sharing							
Minimum 50 kbps upload/download (100 kbps recommended)				Minimum 250kbps upload/download (500 kbps recommended)				Minimum 900 kbps upload/download (3+ mbps recommended)				Minimum 800 kbps upload/download (1.5+ mbps recommended)							

See e.g., <https://www.digitalsamba.com/tech-specs>

146. On information and belief, the Digital Samba system could either have been accessed through an Internet browser on a desktop computer or a mobile device.

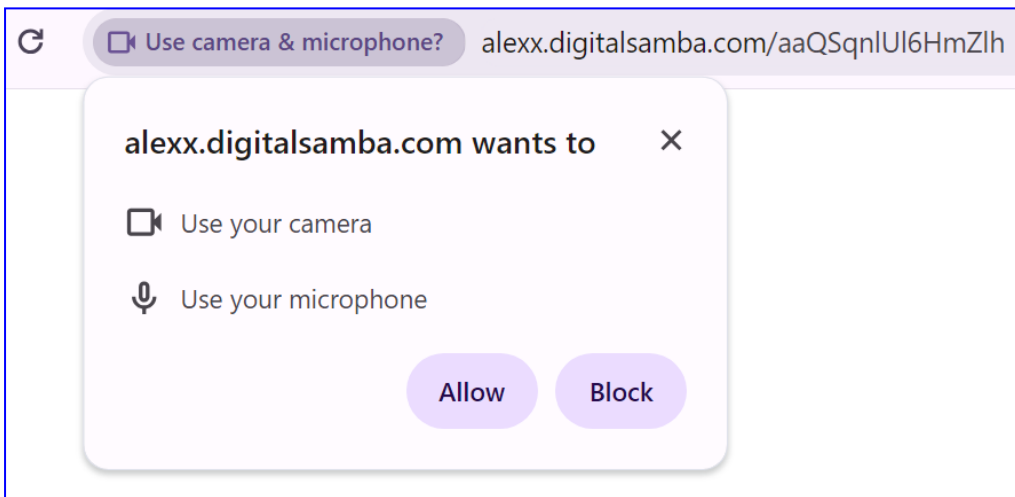
Hardware			Operating systems & browsers			Mobile devices			Bandwidth			Ports		
Windows			Mac			Linux								
Any supported version of Windows.			Mac OS X v10.8 or higher.			Any modern Linux distro.								
Any Chromium based browser is recommended for best performance and feature support.			Any Chromium based browser is recommended for best performance and feature support.			Any Chromium based browser is recommended for best performance and feature support.								
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+			e.g. Chrome 34+, Opera 21+, Vivaldi 2+			e.g. Chrome 34+, Opera 21+, Vivaldi 2+								
Firefox 34+ and Safari 12+ can also be used.			Firefox 34+ and Safari 12+ can also be used.			Firefox 34+ can also be used.								

See e.g., <https://www.digitalsamba.com/tech-specs>

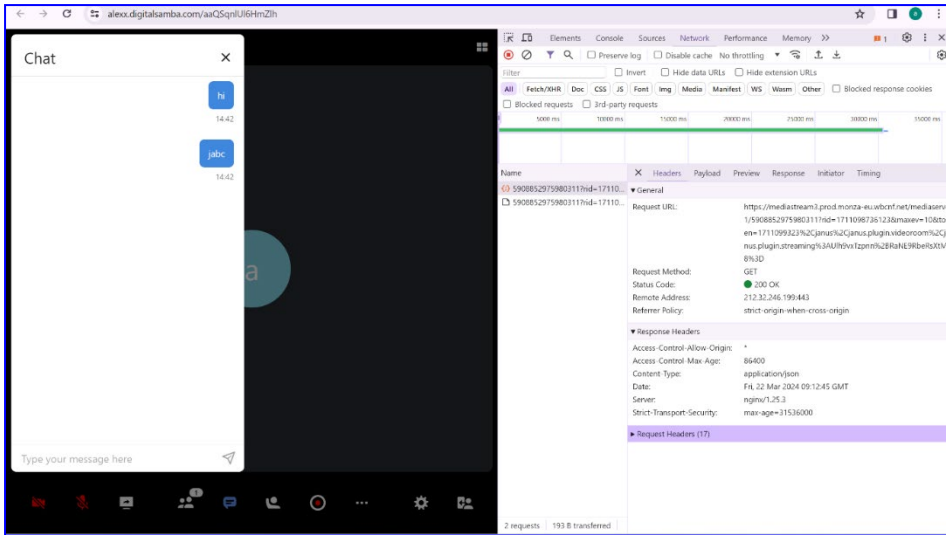


See e.g., <https://www.digitalsamba.com/tech-specs>

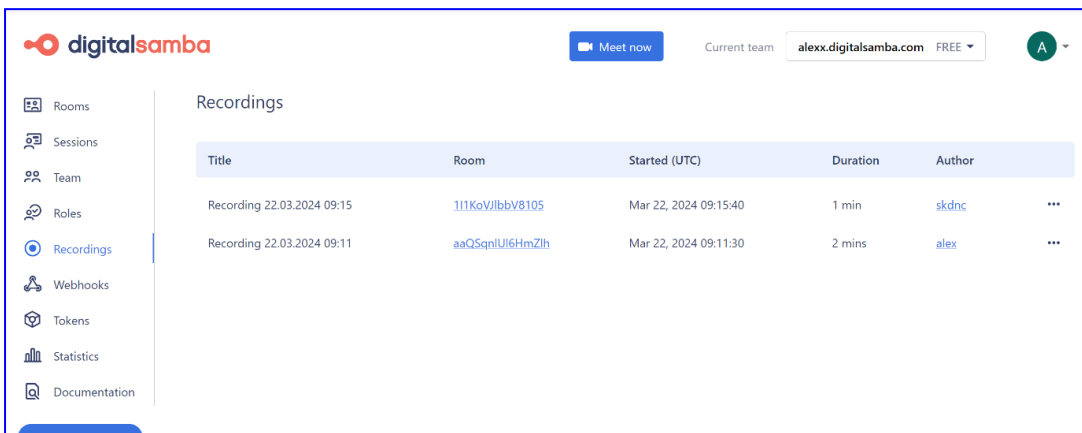
147. On information and belief, Digital Samba employed and provided a method wherein when a user wants to begin recording using the Digital Samba System, in response to a user interaction a server of the Digital Samba System delivers a first code over an internet connection each time recording of audio and video material is sought to be initiated.



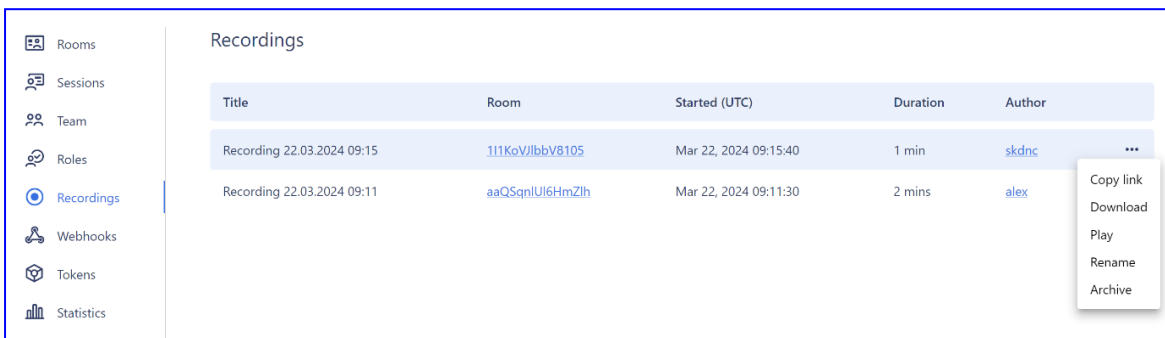
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join)



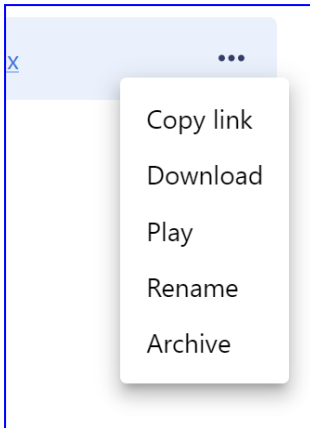
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

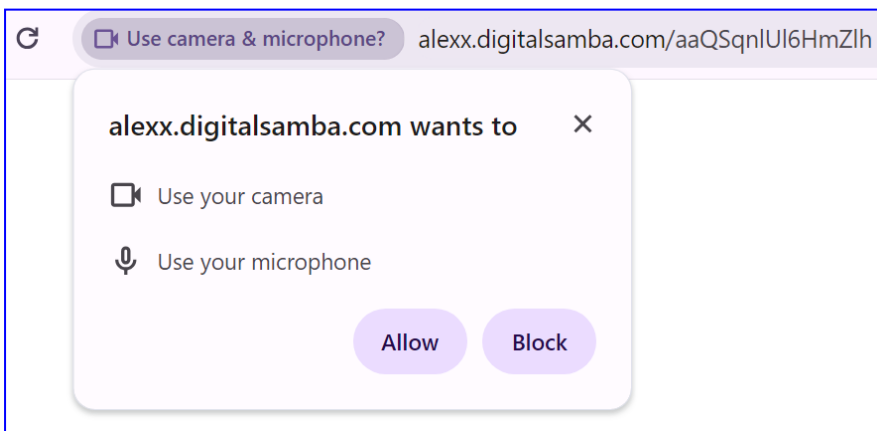


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

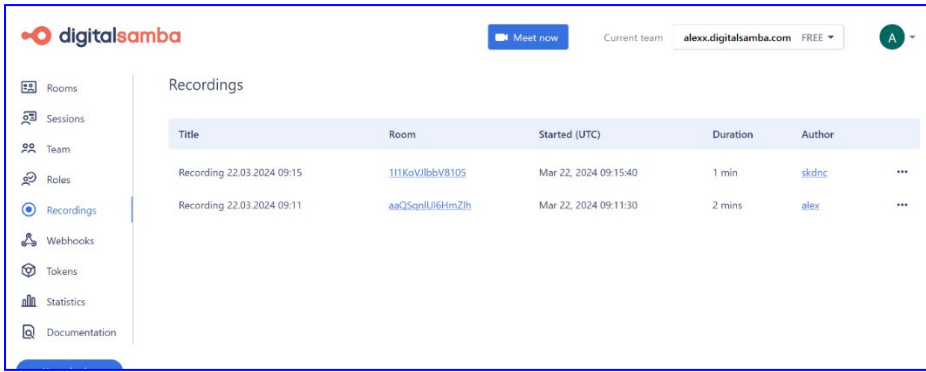


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

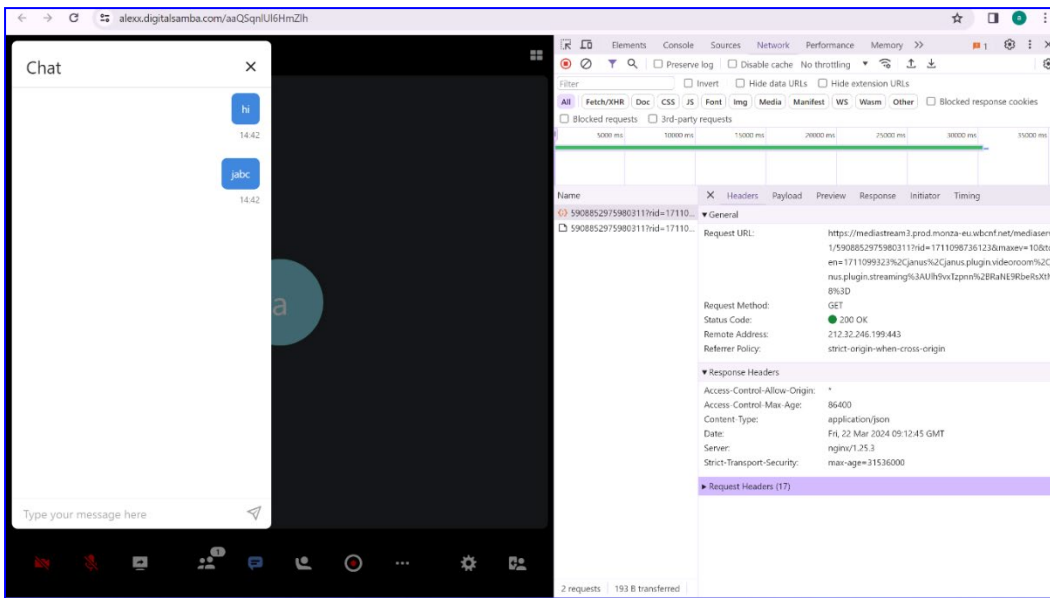
148. On information and belief, the Digital Samba System employed and provided a method wherein when a user wants to begin recording using the Digital Samba Video Products and Services, in response to a user interaction a server of the Digital Samba System delivers a first code configured to be executed at the user's computing device and to initiate the streaming of audio and video material as it is being captured by one or more capturing devices connected to the user's computing device to a server of the Digital Samba System, wherein said first code is not installed on the user's computing device.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join)



See e.g., <https://dashboard.digital samba.com/> (sign in is required, home > recordings)



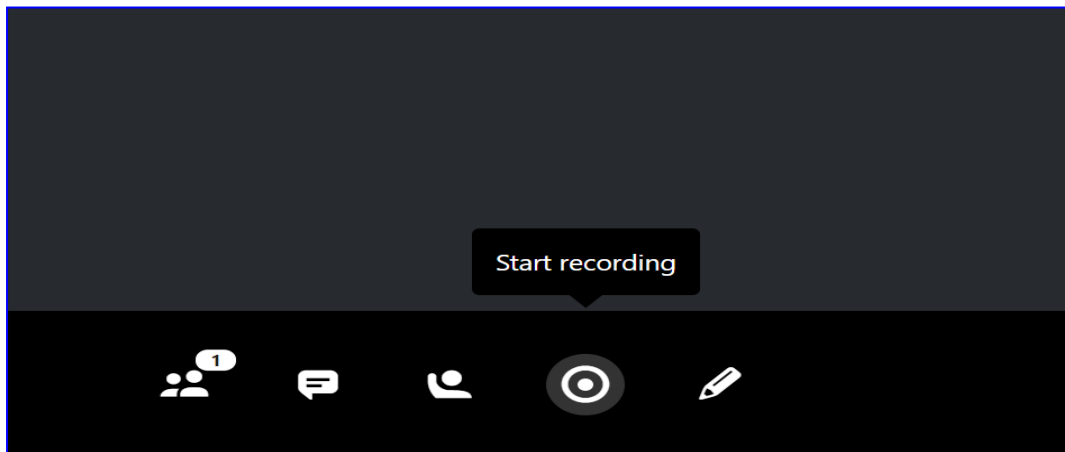
See e.g., <https://dashboard.digital samba.com/> (sign in is required, home > join room > join > chat)

149. On information and belief, the Digital Samba System employed and provided a method comprising the streaming the audio and video material, as it is being captured by one or more capturing devices attached to the user’s computing device, from the user’s computing device to one or more servers of the Digital Samba System.

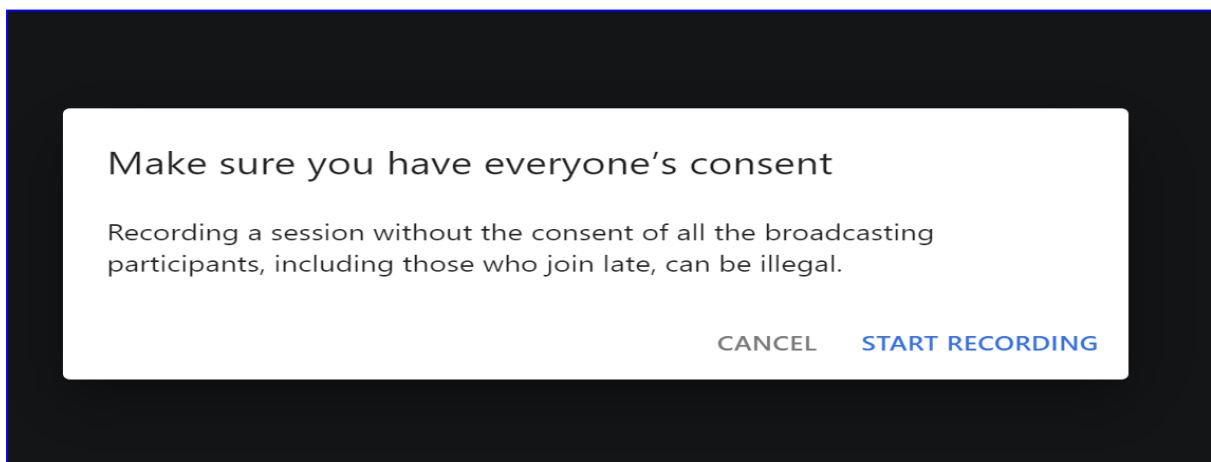
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

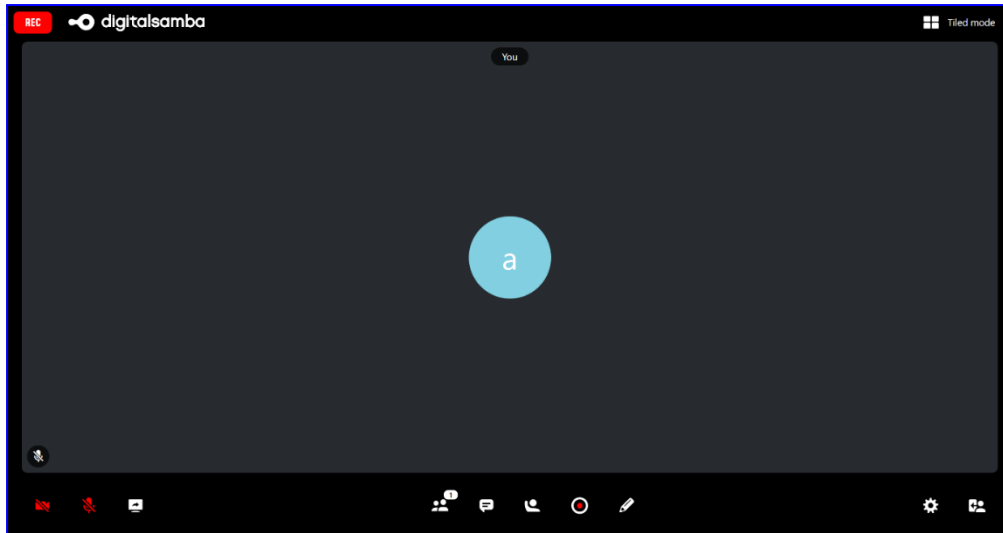
See e.g., <https://www.digitalsamba.com/features>



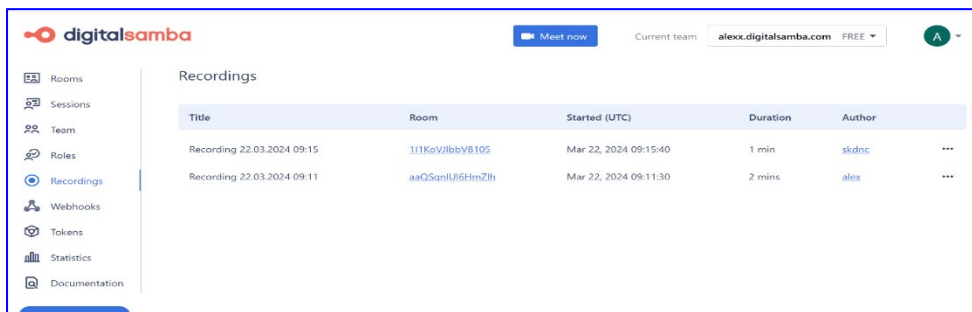
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

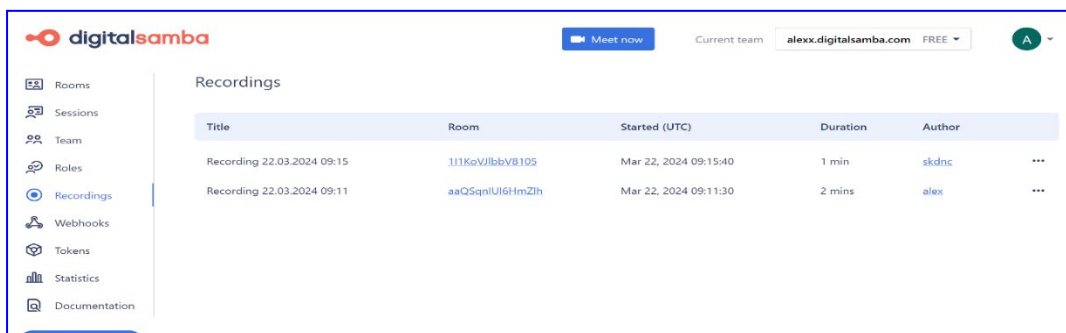


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

150. On information and belief, the Digital Samba System employed and provided a method comprising the recording on one or more servers of the Digital Samba System the audio and video material streamed over the Internet connection.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Audio	Video	Video (HQ and resolution)	Screen sharing	
Minimum 50 kbps upload/download (100 kbps recommended)	Minimum 250kbps upload/download (500 kbps recommended)	Minimum 900 kbps upload/download (3+ mbps recommended)	Minimum 800 kbps upload/download (1.5+ mbps recommended)	

See e.g., <https://www.digitalsamba.com/tech-specs>

151. On information and belief, Digital Samba directly infringed at least claim 1 of the '142 patent in violation of 35 U.S.C. § 271(a) by using and providing the Digital Samba System.

152. Digital Samba's direct infringement has damaged Onstream and caused it to suffer irreparable harm and damages.

Count VII - Infringement of United States Patent No. 10,848,707

153. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

154. On information and belief, Digital Samba (or those acting on its behalf) made, used, sold and/or offered to sell the Digital Samba System in the United States.

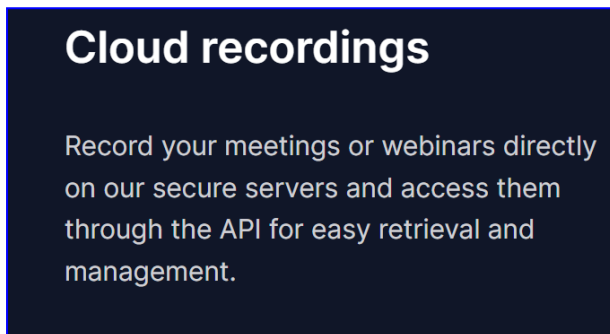
155. Digital Samba, as well as the Digital Samba System, infringed (literally and/or under the doctrine of equivalents) at least claim 1 of the '707 patent.

156. On information and belief, Digital Samba employed and provided a method comprising receiving, at one or more host back end application servers of the Digital Samba System through at least a packet-based network connection, such

as an Internet connection, streamed digital audio and digital video material being streamed from a computing device used by a user of one or more of the Digital Samba System.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

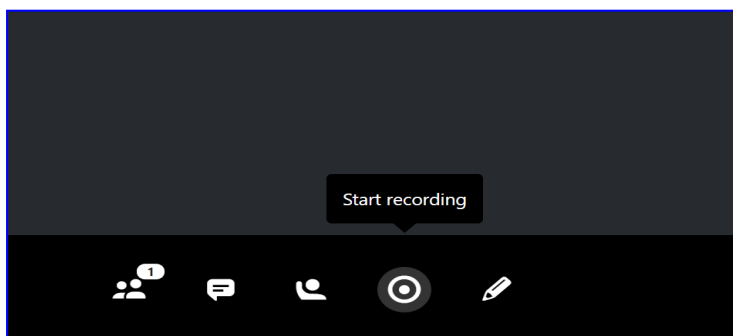
See e.g., <https://www.digitalsamba.com/tech-specs>



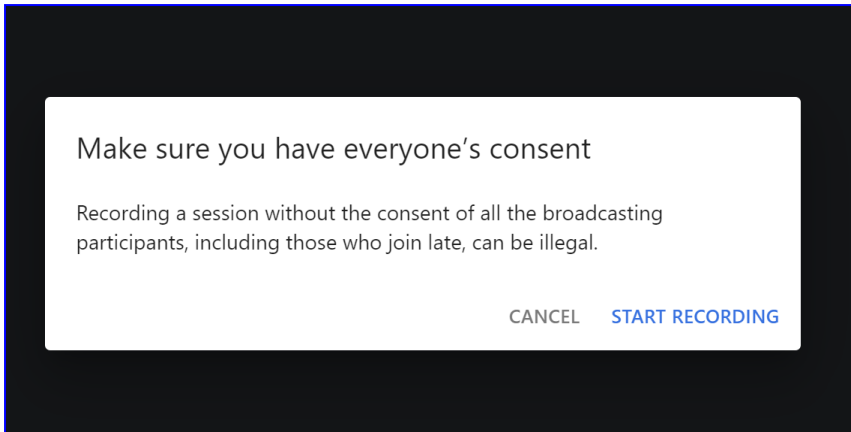
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

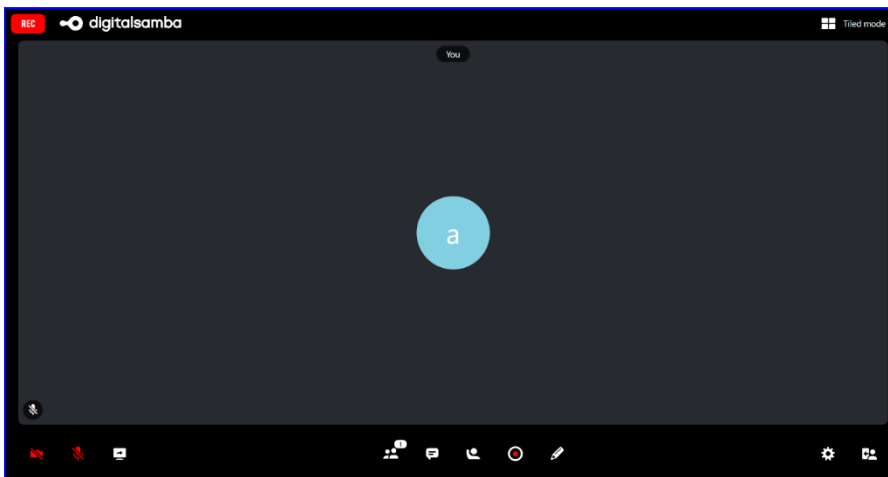
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Audio	Video	Video (HQ and resolution)	Screen sharing	
Minimum 50 kbps upload/download (100 kbps recommended)	Minimum 250kbps upload/download (500 kbps recommended)	Minimum 900 kbps upload/download (3+ mbps recommended)	Minimum 800 kbps upload/download (1.5+ mbps recommended)	

See e.g., <https://www.digitalsamba.com/tech-specs>

157. On information and belief, Digital Samba employed and provided a method wherein the streamed digital audio and digital video material that is

captured on a computing device used by a user of one or more of the Digital Samba Video Products and Services without requiring installation of recording software on the computing device used by a user of one or more of the Digital Samba System that is configured to record digital audio and digital video material as a complete file to a local storage memory.

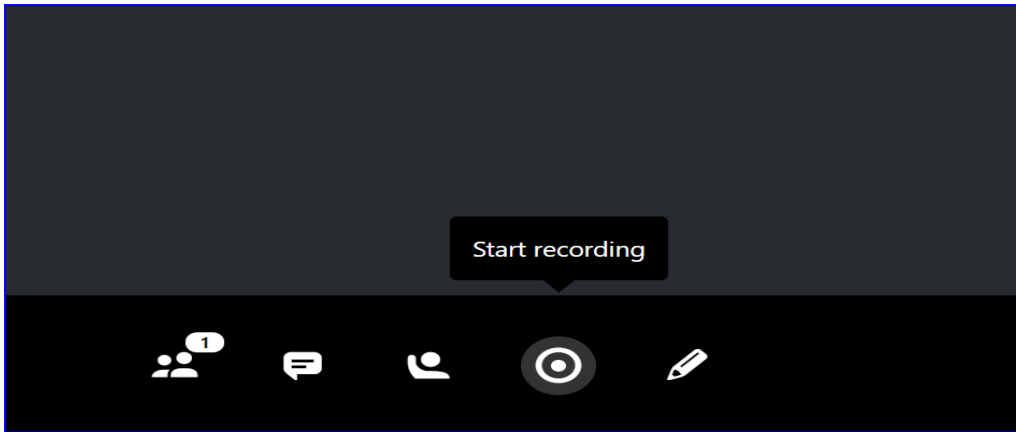
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

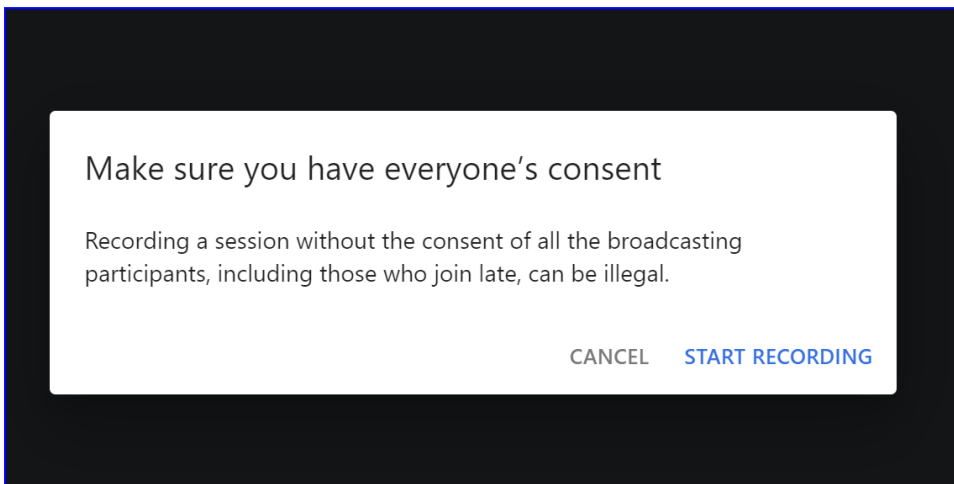
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

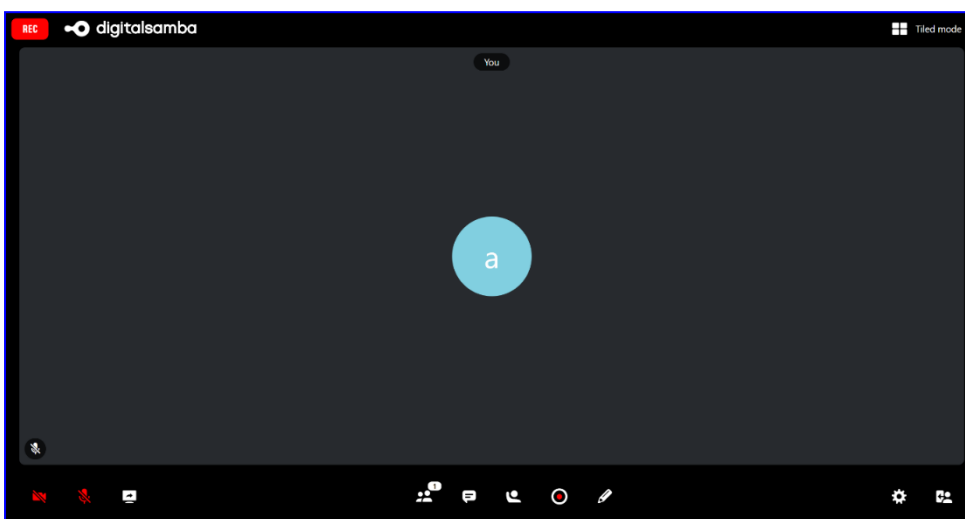
See e.g., <https://www.digitalsamba.com/features>



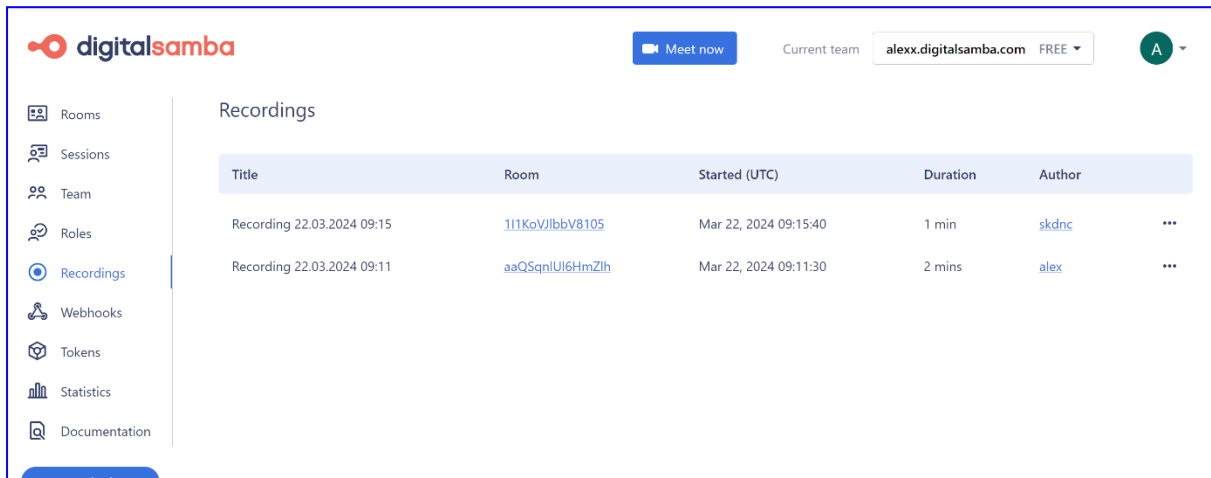
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

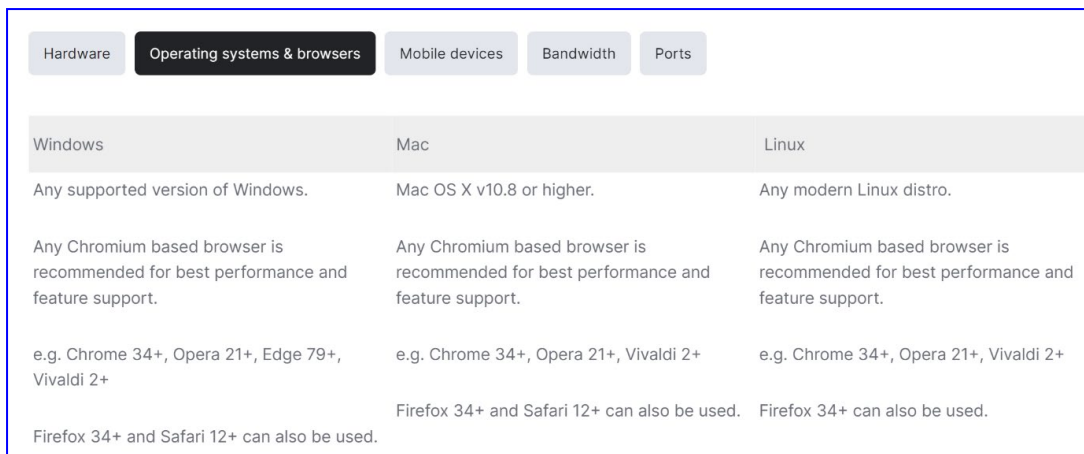


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

158. On information and belief, Digital Samba employed and provided a method comprising remotely recording streamed digital audio and digital video material over at least the packet-based network connection at the one or more host back end application servers of the Digital Samba System as a sequentially stored file.

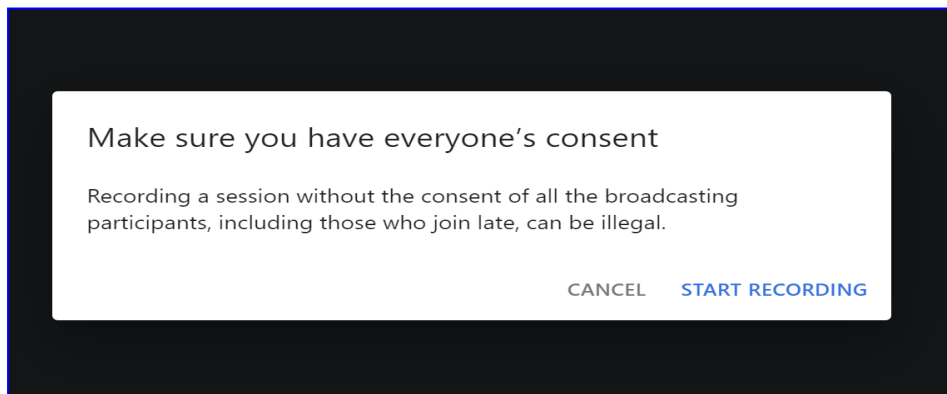


See e.g., <https://www.digitalsamba.com/tech-specs>

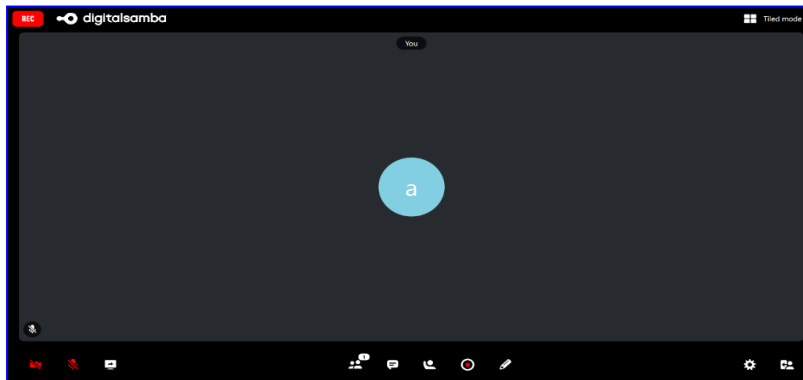
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

See e.g., <https://www.digitalsamba.com/features>

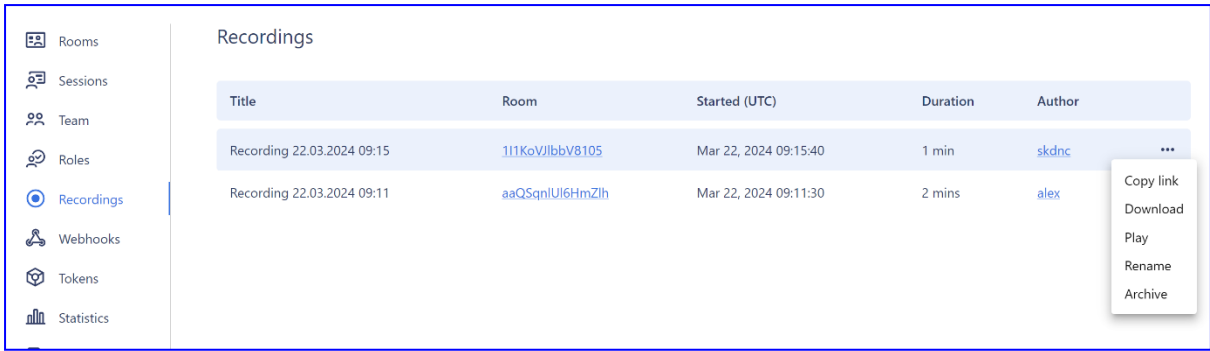


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

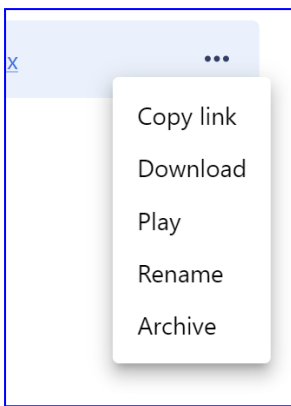


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

159. On information and belief, Digital Samba employed and provided a method comprising generating a pointer comprising a URL associated with the sequentially stored file to facilitate accessing of the sequentially stored file.

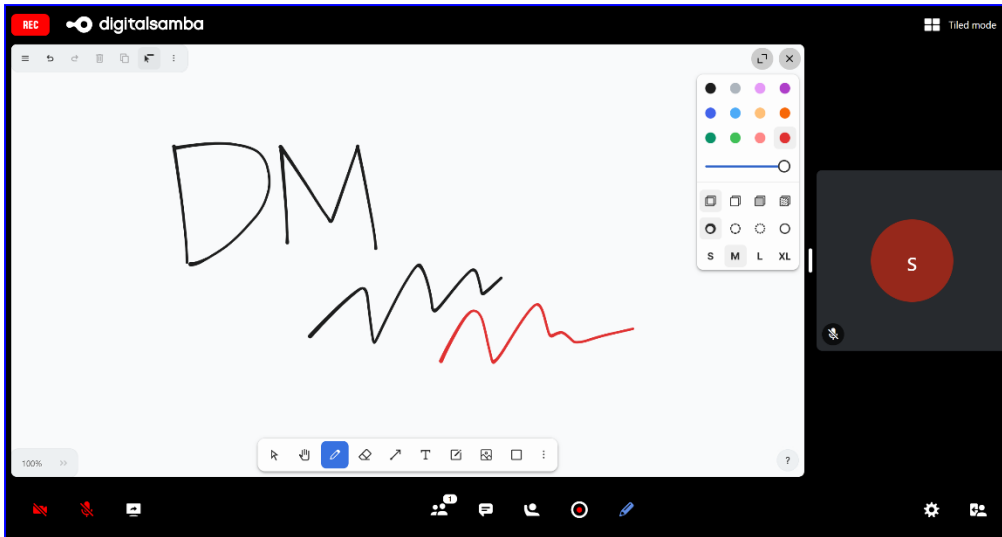


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

160. On information and belief, Digital Samba employed and provided a method comprising enabling additional digital material comprising (i) digital still image material, (ii) digital audio material, (iii) digital video material, (iv) digital video material and digital audio material, (v) digital still image material and digital video material, (vi) digital still image material and digital audio material, or (vii) digital still image material, digital audio material, and digital video material, to be associated with the sequentially stored file at the one or more host back end application servers of the Digital Samba System.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > enable whiteboard)

Whiteboard

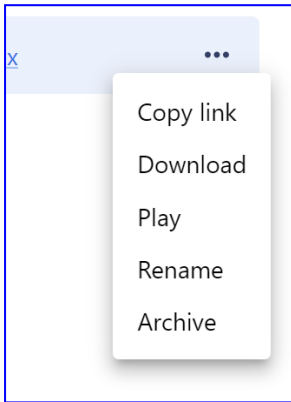
Let users collaborate visually using intuitive drawing and mark-up tools during a video call.

See e.g., <https://www.digitalsamba.com/features>

161. On information and belief, Digital Samba employed and provided a method comprising providing remote user access to the sequentially stored file and the additional digital material in response to activation of the pointer comprising the URL.

Title	Room	Started (UTC)	Duration	Author	
Recording 22.03.2024 09:15	111KoVjIbbV8105	Mar 22, 2024 09:15:40	1 min	skdnc	...
Recording 22.03.2024 09:11	aaQ5qnlU6HmZlh	Mar 22, 2024 09:11:30	2 mins	alex	Copy link Download Play Rename Archive

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

162. On information and belief, Digital Samba directly infringed at least claim 1 of the '707 patent in violation of 35 U.S.C. § 271(a) by using and providing the Digital Samba System.

163. Digital Samba's direct infringement has damaged Onstream and caused it to suffer irreparable harm and damages.

Count VIII - Infringement of United States Patent No. 10,951,855

164. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

165. On information and belief, Digital Samba (or those acting on its behalf) made, used, sold, imported and/or offered to sell the Digital Samba System; and made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Digital Samba System in the United States that infringed (literally and/or under the doctrine of equivalents) at least claim 1 of the '855 patent.

166. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system.

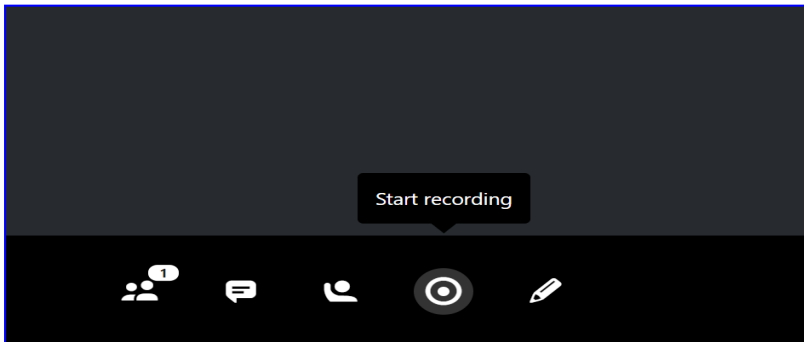
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

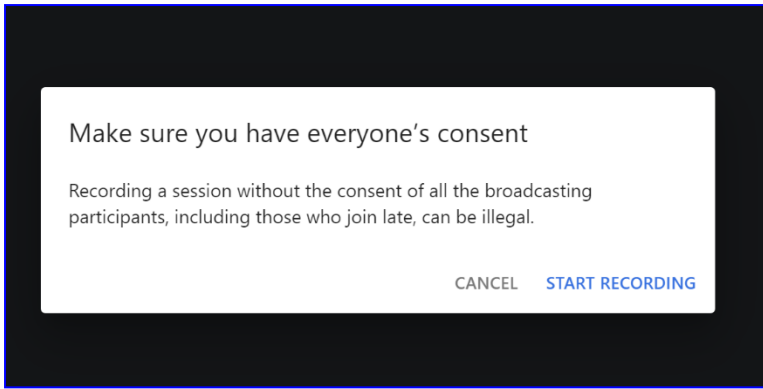
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

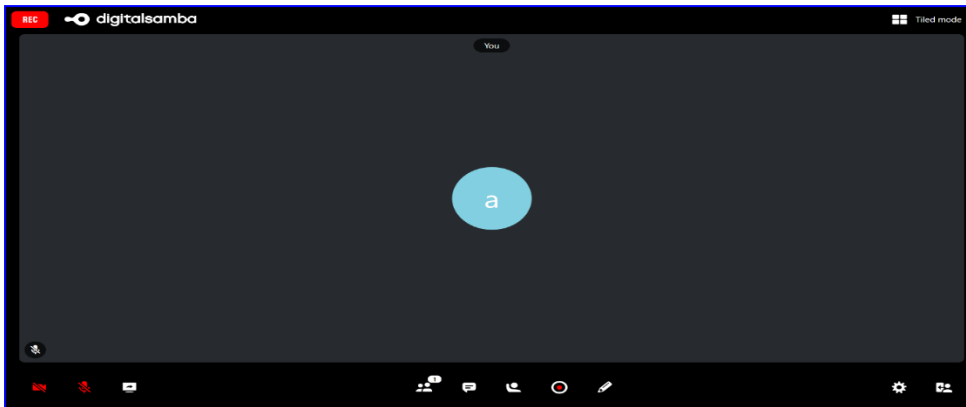
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

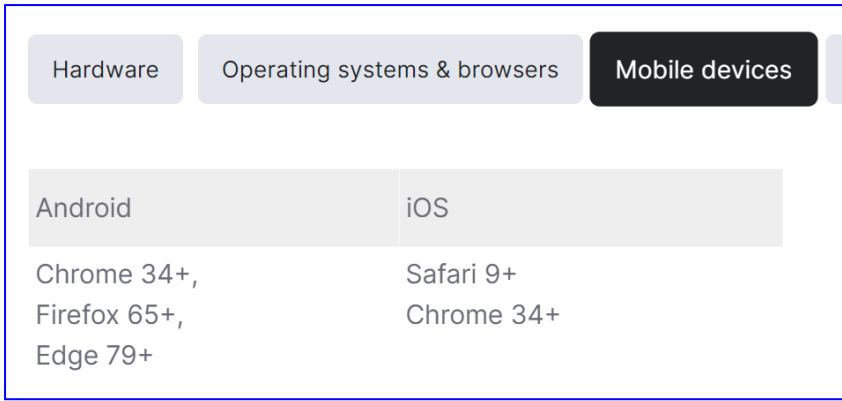


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

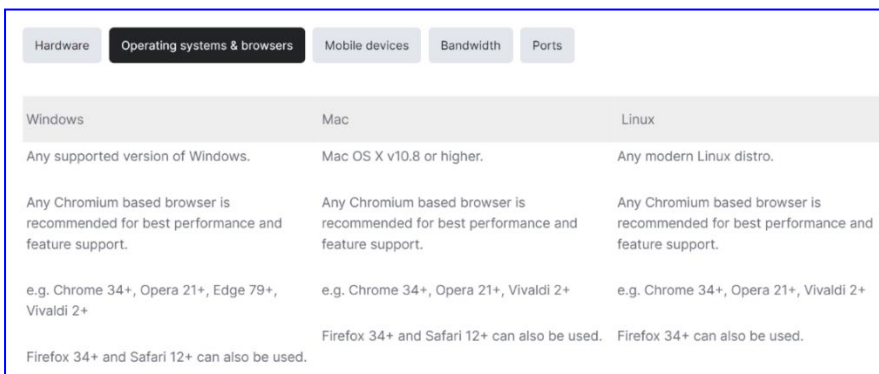


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

167. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system comprising an application configured to operate on a mobile front end digital audio and digital video capturing device.

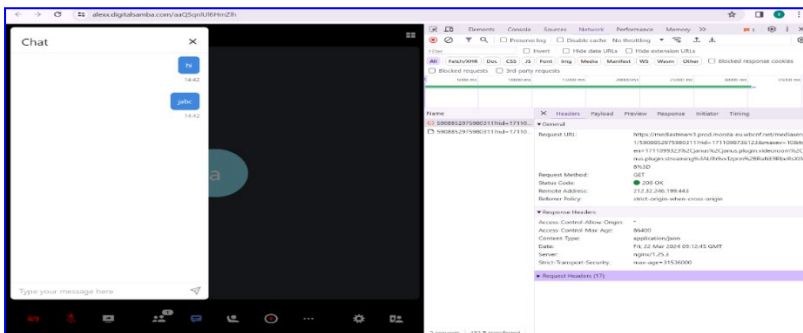


See e.g., <https://www.digitalsamba.com/tech-specs>

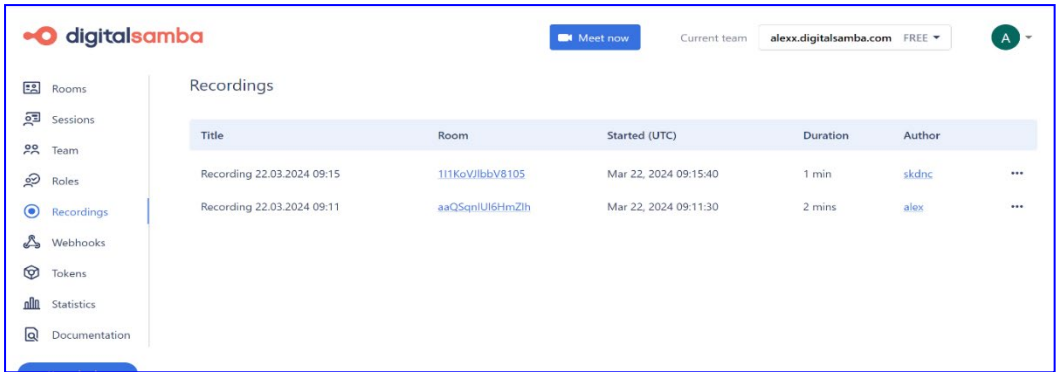


See e.g., <https://www.digitalsamba.com/tech-specs>

168. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system comprising a host back-end application server system comprising one or more host back end application servers.

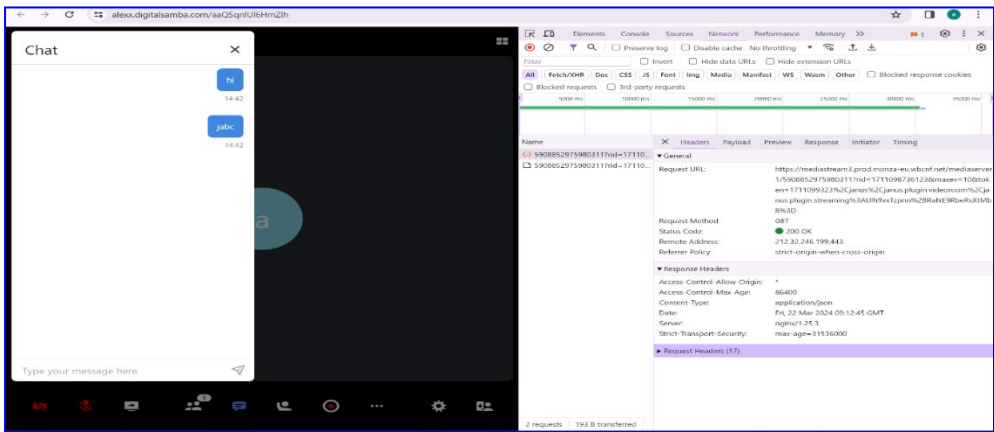


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

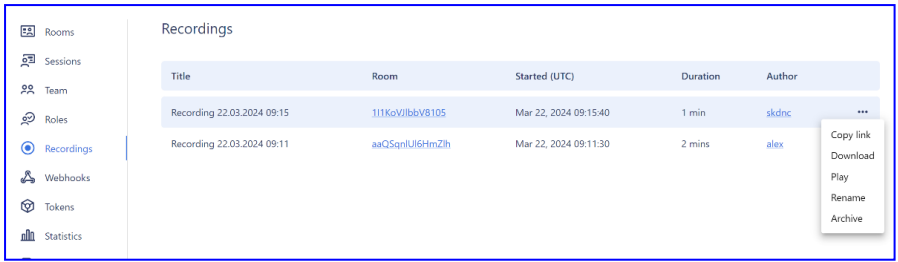


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

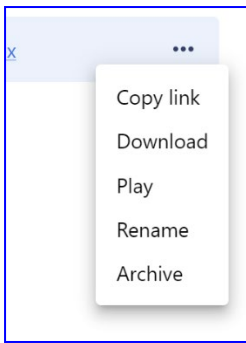
169. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system wherein in response to an interaction with a user, the host back end application server system delivers to the application, each time recording of digital audio and digital video material is sought to be initiated, a stream number that is associated with an account of the user.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)

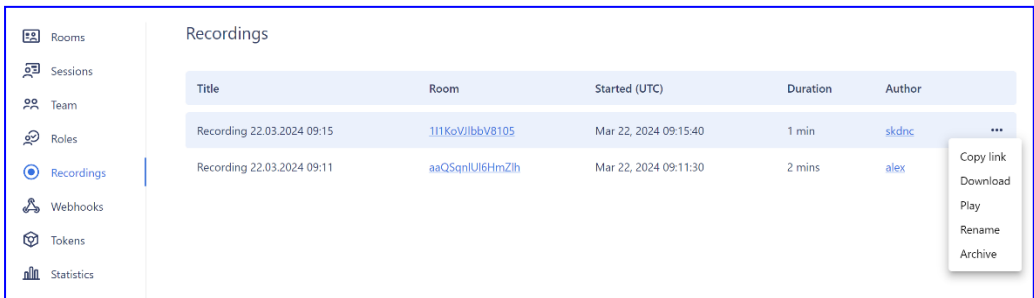


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

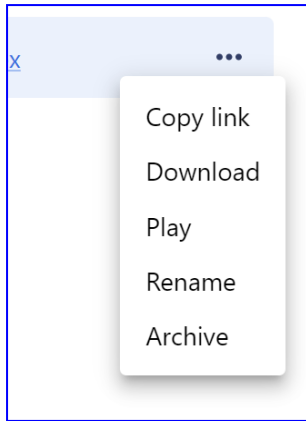


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

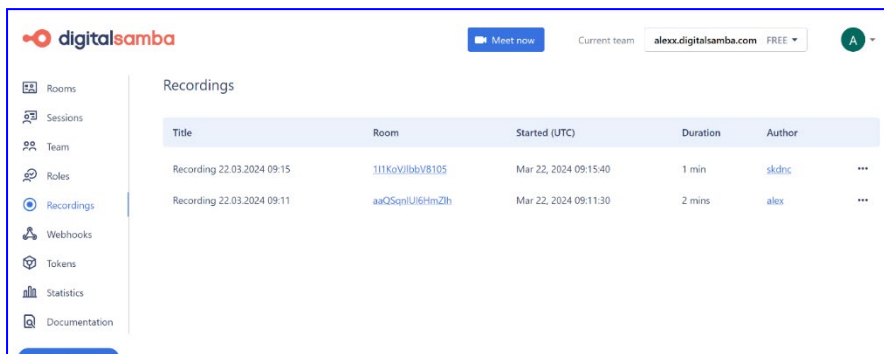
170. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system wherein the application is configured to use the stream number to initiate secure streaming of digital audio and digital video material to the host back-end application server system.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

171. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system wherein the digital audio and digital video material is not stored as a complete file on the mobile front end digital audio and digital video capturing device prior to initiation of the secure streaming of the digital audio and digital video material to the host back end application server system.

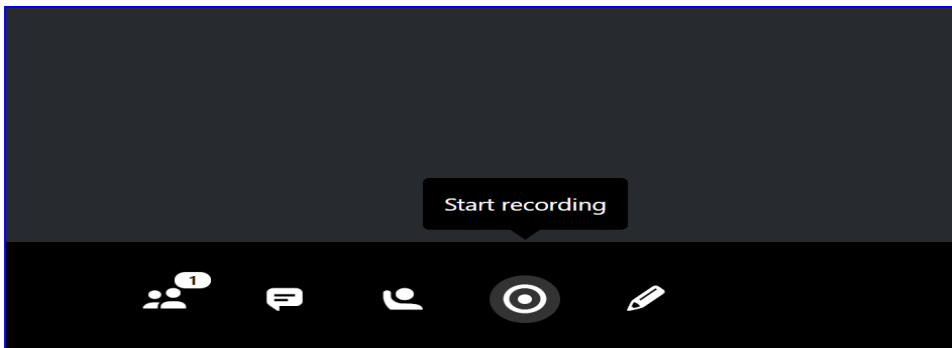
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

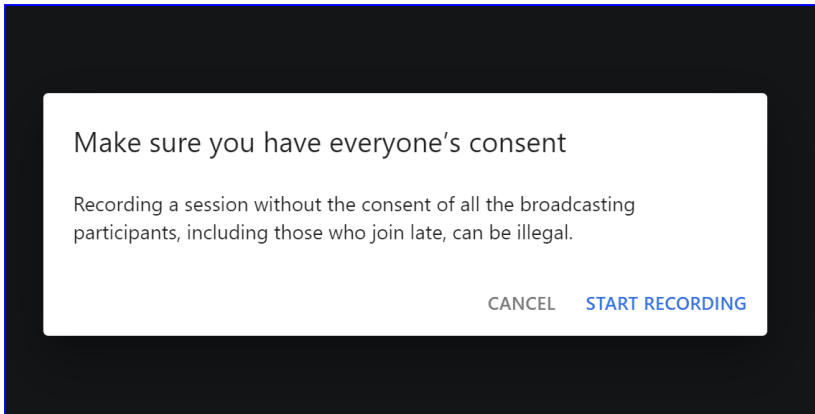
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

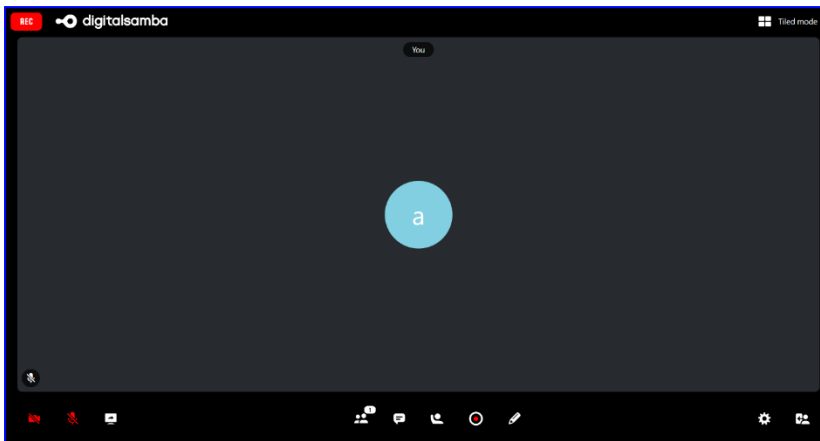
See e.g., <https://www.digitalsamba.com/features>



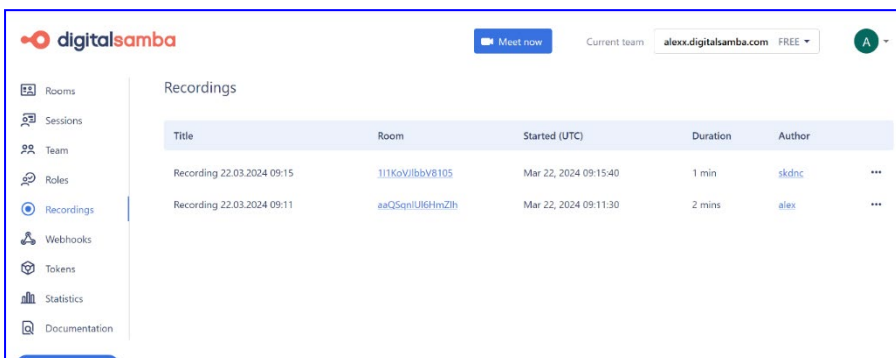
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

172. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system wherein the application is configured to use a secure real time messaging protocol to securely stream the digital audio and digital video material from the mobile front end digital audio and digital video capturing device over at least a packet-based network connection (e.g., the Internet), to the host back end application server system, as the digital audio and digital video material is being captured by the mobile front end digital audio and digital video capturing device.

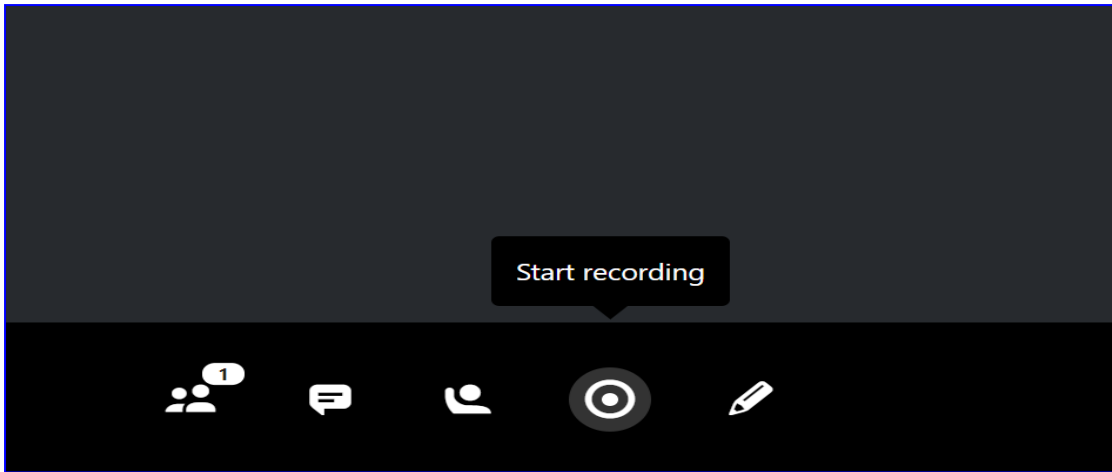
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

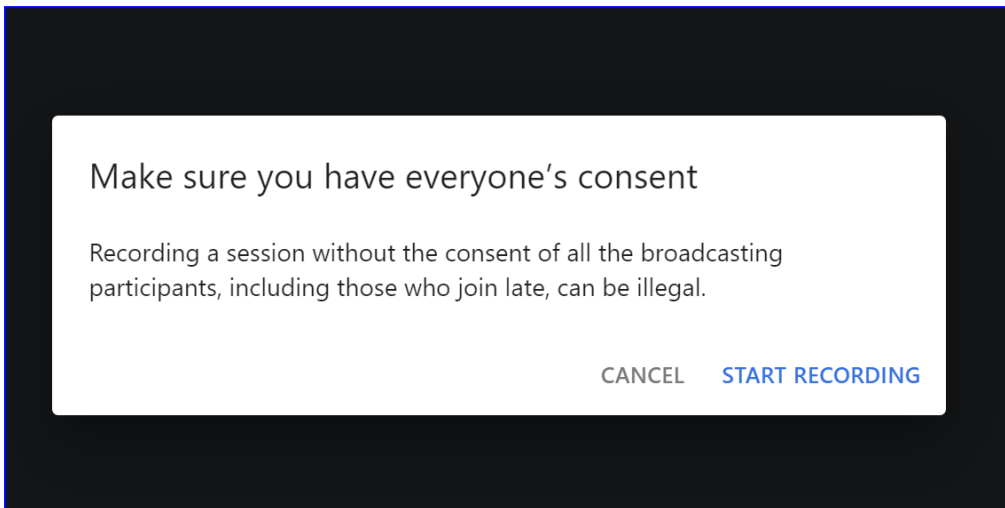
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

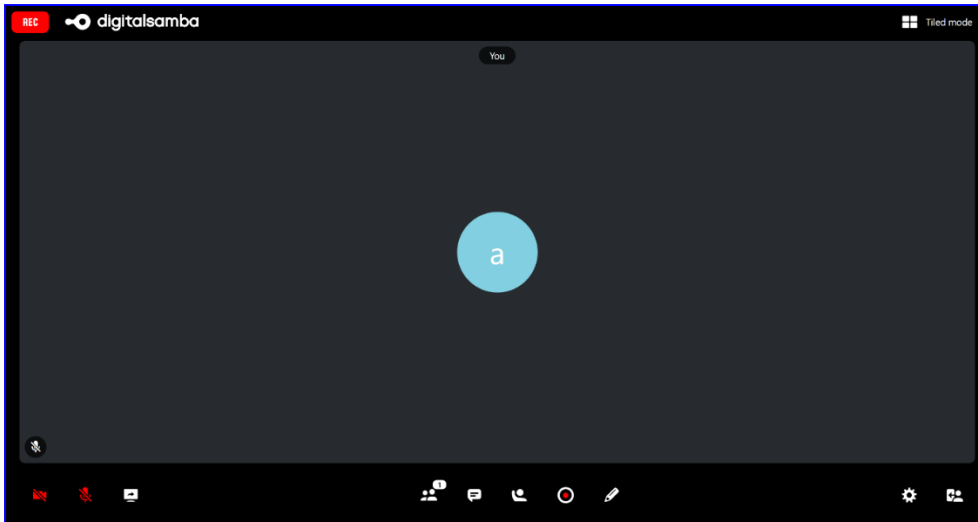
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

173. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system wherein the application is capable of securely streaming the digital audio and digital video material without requiring local installation and concurrent execution on the mobile front end digital audio and digital video capturing device of an additional custom recording software application that is configured to record digital audio and digital video material as a complete file to a local storage memory.

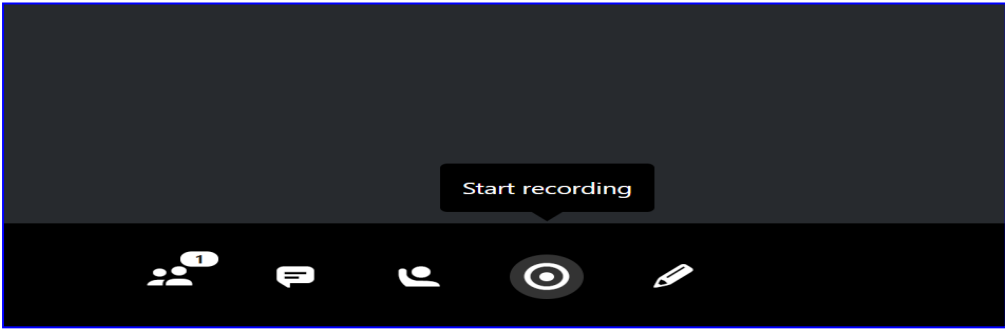
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

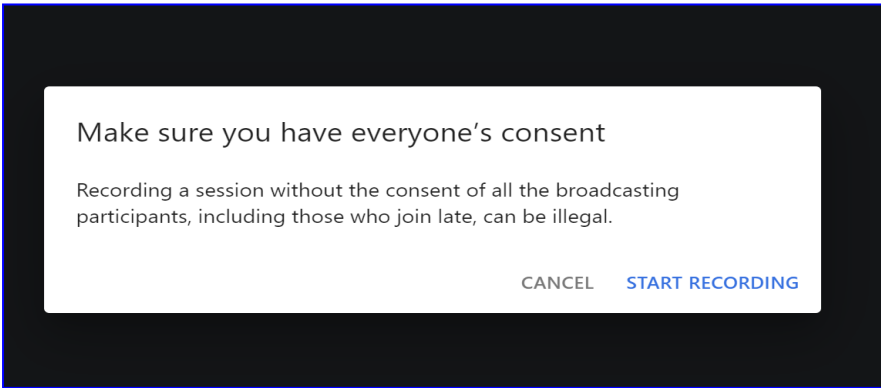
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

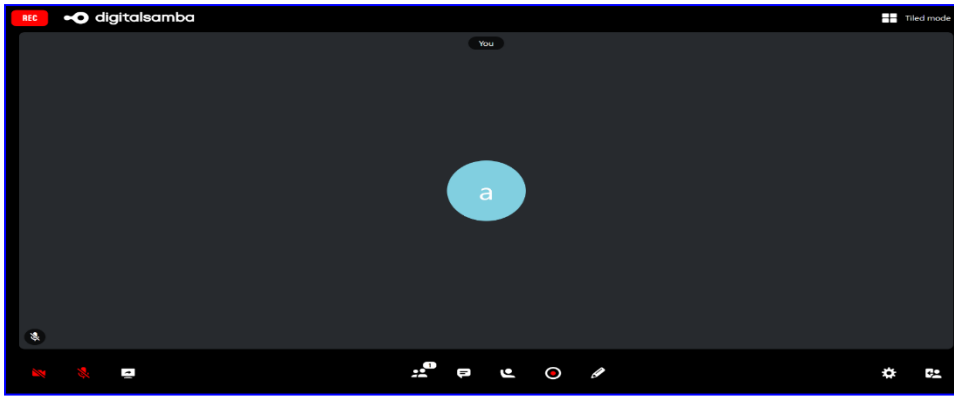
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

174. On information and belief, one or more components of the Digital Samba System comprised a secure distributed digital audio and digital video recording system wherein at least one host back-end application server records the digital audio and digital video material securely streamed from the mobile front end digital audio and digital video capturing device.

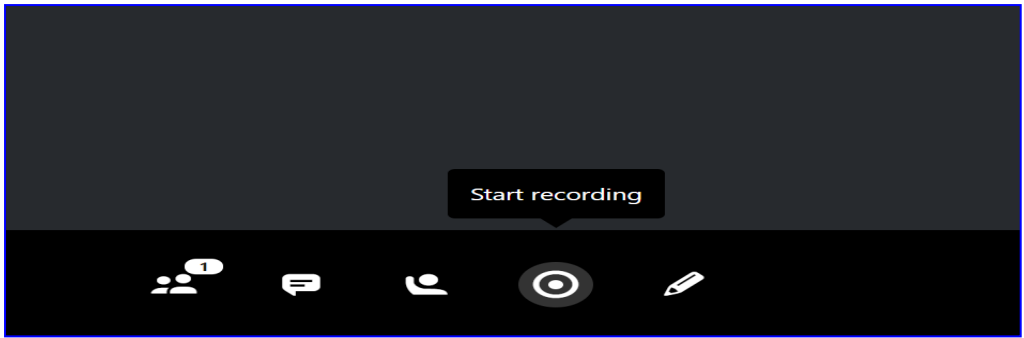
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

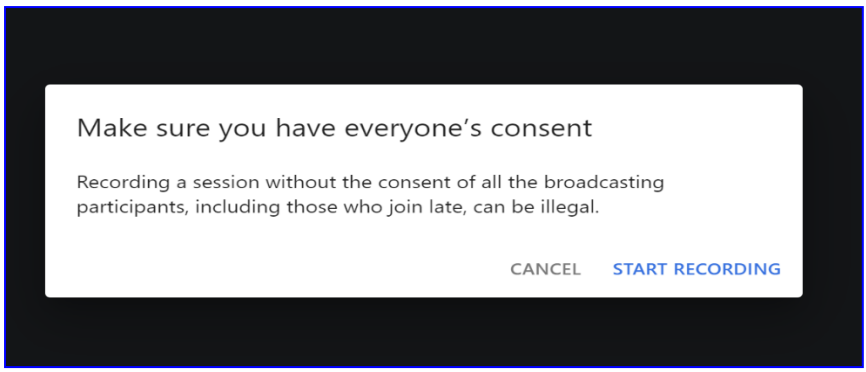
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

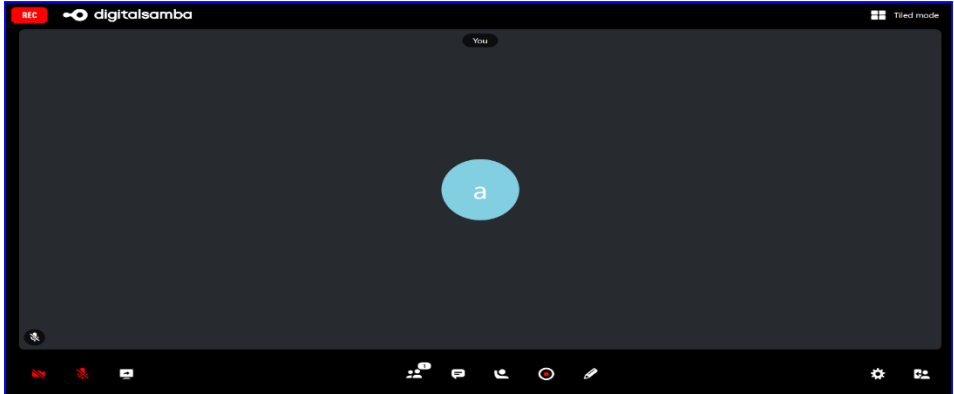
See e.g., <https://www.digitalsamba.com/features>



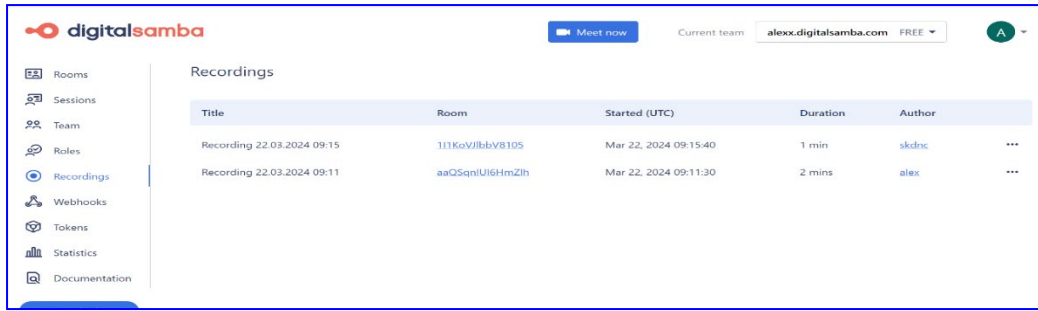
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digital samba.com/> (sign in is required, home > recordings)

175. On information and belief, Digital Samba directly infringed at least claim 1 of the '855 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Digital Samba System; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Digital Samba System.

176. Digital Samba's direct infringement has damaged Onstream and caused it to suffer irreparable harm and damages.

Count IX - Infringement of United States Patent No. 11,128,833

177. Onstream repeats, realleges, and incorporates by reference, as if fully set forth here, the allegations of the preceding paragraphs above.

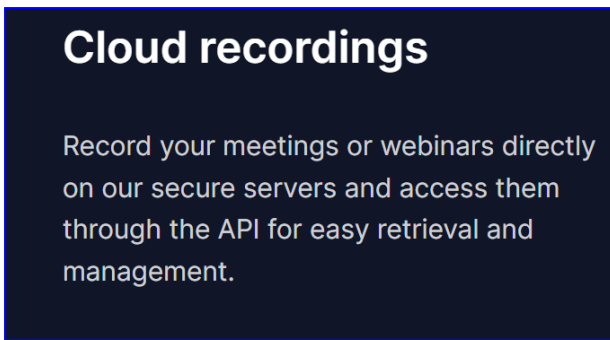
178. On information and belief, Digital Samba (or those acting on its behalf) made, used, sold, imported and/or offered to sell the Digital Samba System; and made, used, sold, sold access to, imported, offered to sell and/or offered to sell access to the Digital Samba System in the United States that infringed (literally and/or under the doctrine of equivalents) at least claim 1 of the '833 patent.

179. On information and belief, one or more components of the Digital Samba System employed and provided a method for network-based recording and

delivery of digital audio and digital video material.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

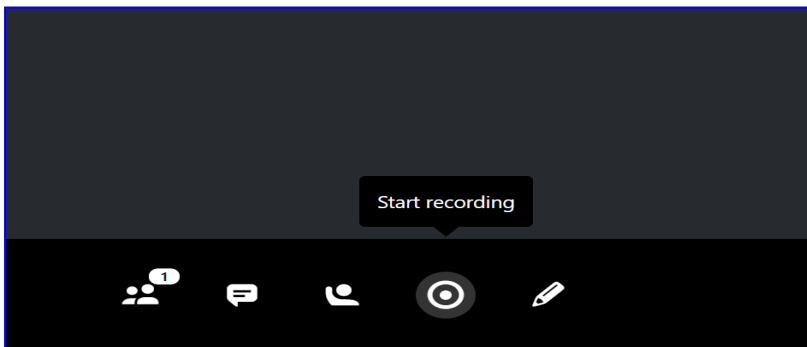
See e.g., <https://www.digitalsamba.com/tech-specs>



Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

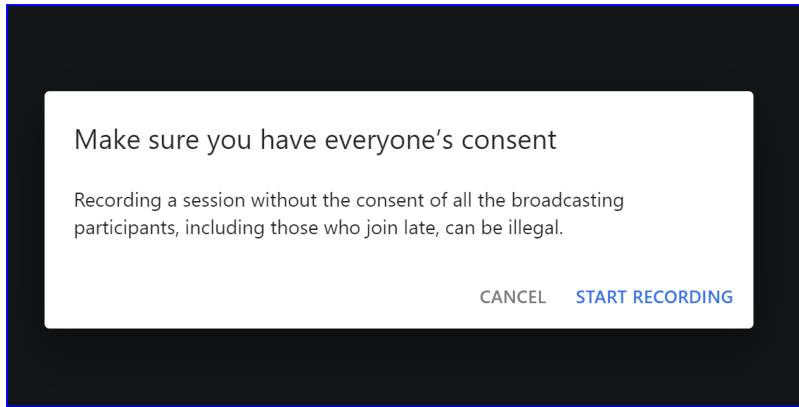
See e.g., <https://www.digitalsamba.com/features>



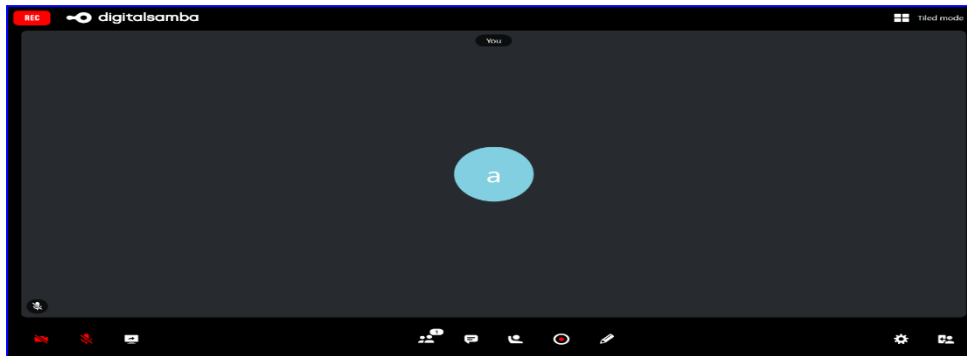
Start recording

Participants, Chat, Mute, Recording, Edit

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

180. On information and belief, one or more components of the Digital Samba System employed and provided a method for network-based recording and delivery of digital audio and digital video material comprising recording, over a packet-based network connection, (e.g., the Internet) at a host back end, digital audio and digital video material that originates from a user front end without using any recording software installed on the user front end.

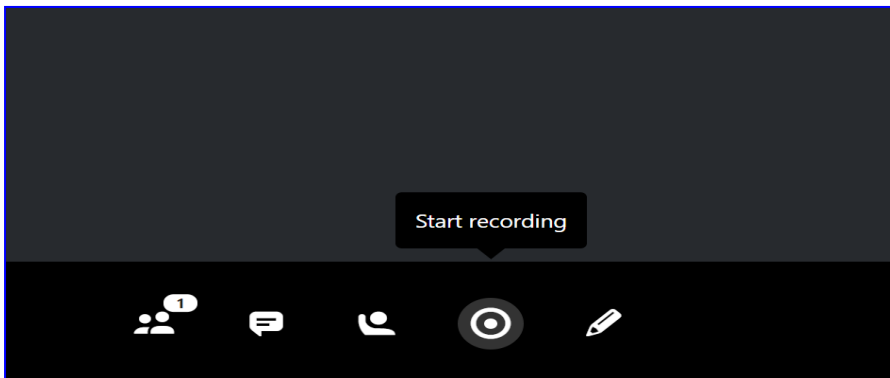
Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+		
Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ and Safari 12+ can also be used.	Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

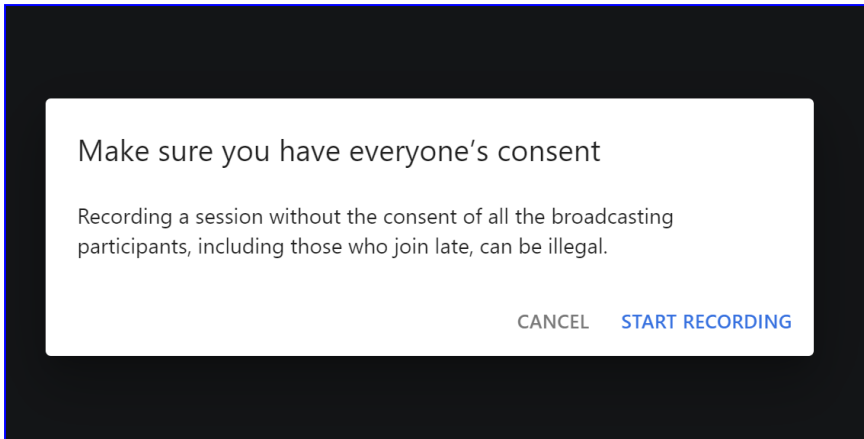
Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

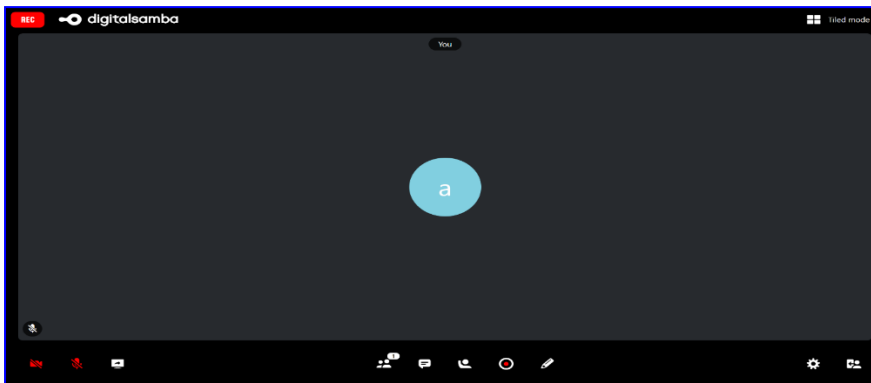
See e.g., <https://www.digitalsamba.com/features>



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

181. On information and belief, one or more components of the Digital Samba System employed and provided a method for network-based recording and delivery of digital audio and digital video material wherein the recording is accomplished using only executable code delivered to the user front end from the host back end and a recording device on the user front end.

Hardware	Operating systems & browsers	Mobile devices	Bandwidth	Ports
Windows	Mac	Linux		
Any supported version of Windows.	Mac OS X v10.8 or higher.	Any modern Linux distro.		
Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.	Any Chromium based browser is recommended for best performance and feature support.		
e.g. Chrome 34+, Opera 21+, Edge 79+, Vivaldi 2+	e.g. Chrome 34+, Opera 21+, Vivaldi 2+ Firefox 34+ and Safari 12+ can also be used.	e.g. Chrome 34+, Opera 21+, Vivaldi 2+ Firefox 34+ can also be used.		

See e.g., <https://www.digitalsamba.com/tech-specs>

Cloud recordings

Record your meetings or webinars directly on our secure servers and access them through the API for easy retrieval and management.

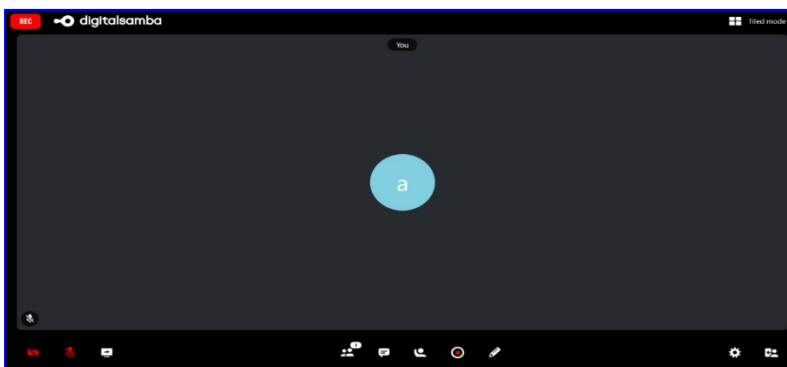
See e.g., <https://www.digitalsamba.com/features>

Make sure you have everyone's consent

Recording a session without the consent of all the broadcasting participants, including those who join late, can be illegal.

CANCEL START RECORDING

See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

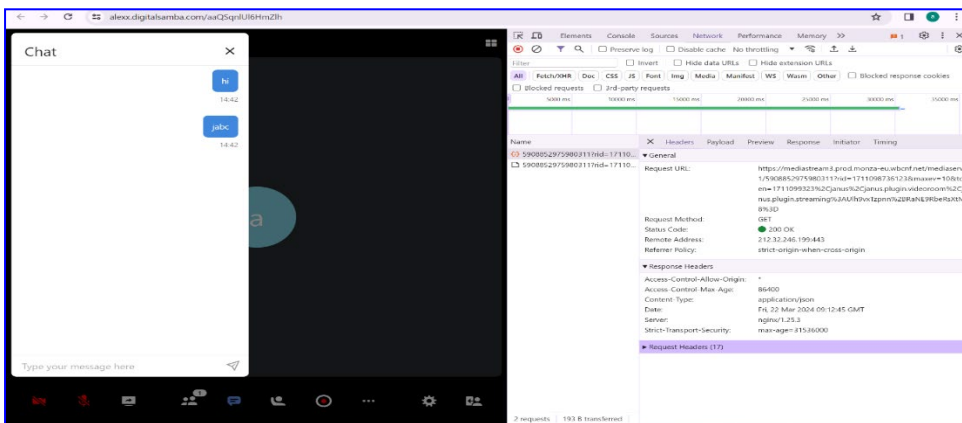


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > record)

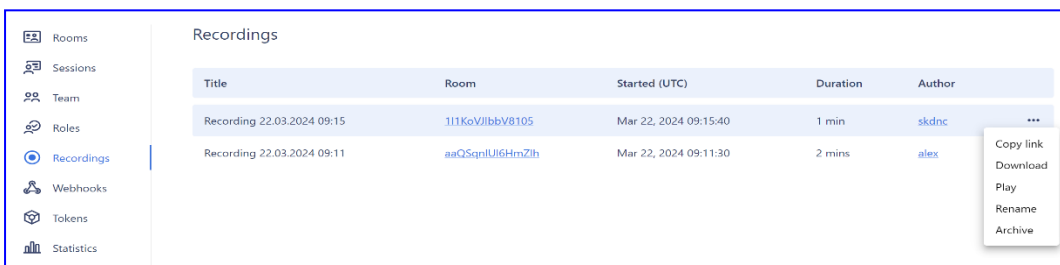


See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

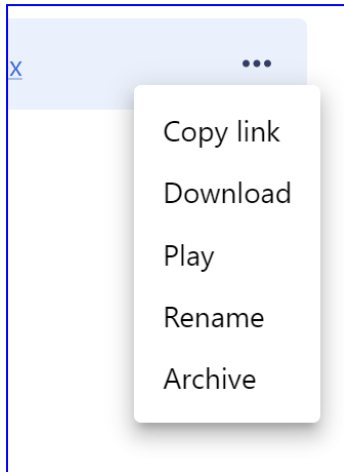
182. On information and belief, one or more components of the Digital Samba System employed and provided a method for network-based recording and delivery of digital audio and digital video material comprising storing the recorded digital audio and digital video material at the host back end.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)



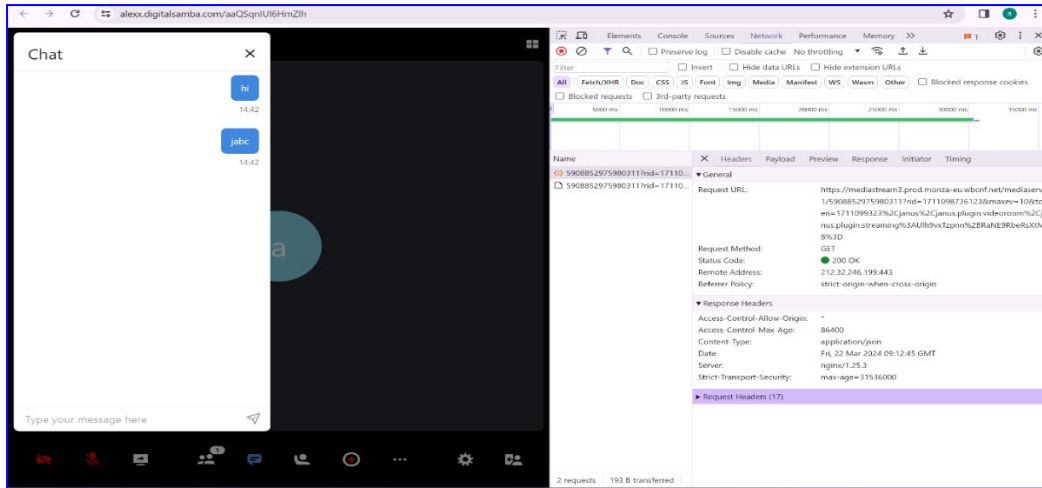
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

183. On information and belief, one or more components of the Digital Samba System employed and provided a method for network-based recording and delivery of digital audio and digital video material comprising generating code associated with the stored digital audio and digital video material to facilitate accessing the stored digital audio and digital video material.

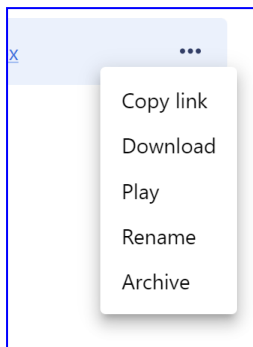
184. On information and belief, one or more components of the Digital Samba System employed and provided a method for network-based recording and delivery of digital audio and digital video material comprising enabling the generated code to be activated at an additional location.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)



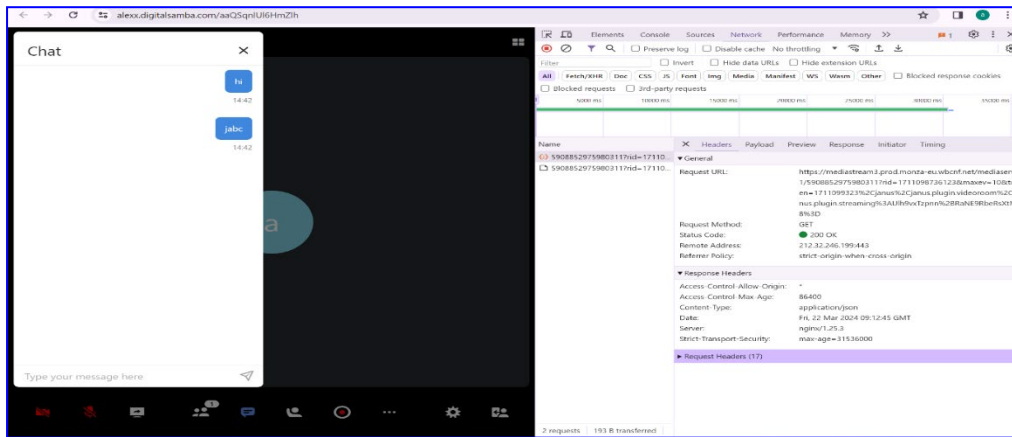
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)



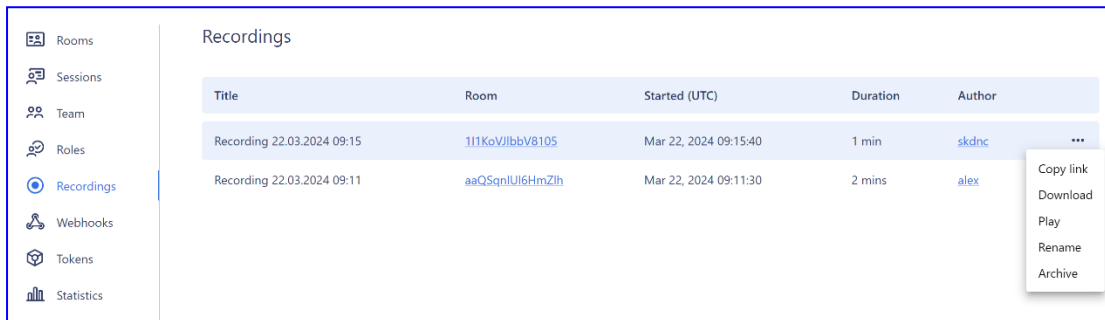
See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

185. On information and belief, one or more components of the Digital Samba System employed and provided a method for network-based recording and

delivery of digital audio and digital video material wherein activating the generated code provides access to the stored digital audio and digital video material.



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > join room > join > chat)



See e.g., <https://dashboard.digitalsamba.com/> (sign in is required, home > recordings)

186. On information and belief, Digital Samba directly infringed at least claim 1 of the '833 patent in violation of 35 U.S.C. § 271(a) by making, using, selling, importing, and/or offering to sell the Digital Samba System; and making, using, selling, selling access to, importing, offering for sale, and/or offering to sell access to the Digital Samba System.

187. Digital Samba's direct infringement has damaged Onstream and caused it to suffer irreparable harm and damages.

JURY DEMANDED

188. Pursuant to Federal Rule of Civil Procedure 38(b), Onstream hereby requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Onstream respectfully requests this Court to enter judgment in Onstream's favor and against Digital Samba as follows:

- a. finding that Digital Samba has infringed one or more claims of the '068 patent under 35 U.S.C. §§ 271(a) and (b);
- b. finding that Digital Samba has infringed one or more claims of the '728 patent under 35 U.S.C. §§ 271(a) and (b);
- c. finding that Digital Samba has infringed one or more claims of the '930 patent under 35 U.S.C. §§ 271(a) and (b);
- d. finding that Digital Samba has infringed one or more claims of the '648 patent under 35 U.S.C. §§ 271(a) and (b);
- e. finding that Digital Samba has infringed one or more claims of the '109 patent under 35 U.S.C. §§ 271(a);
- f. finding that Digital Samba has infringed one or more claims of the '142 patent under 35 U.S.C. §§ 271(a);
- g. finding that Digital Samba has infringed one or more claims of the '707 patent under 35 U.S.C. §§ 271(a);
- h. finding that Digital Samba has infringed one or more claims of the '855 patent under 35 U.S.C. §§ 271(a);
- i. finding that Digital Samba has infringed one or more claims of the '833

- patent under 35 U.S.C. §§ 271(a);
- j. awarding Onstream damages under 35 U.S.C. § 284, or otherwise permitted by law, including supplemental damages for any continued post-verdict infringement;
 - k. awarding Onstream pre-judgment and post-judgment interest on the damages award and costs;
 - l. awarding cost of this action (including all disbursements) and attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by the law; and
 - m. awarding such other costs and further relief that the Court determines to be just and equitable.

Dated: January 30, 2025

Respectfully submitted,

/s/ Oded Burger

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