

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

VIRTUAL CREATIVE ARTISTS, LLC,

Plaintiff,

v.

**COSTAR REALTY INFORMATION,
INC.,**

Defendant.

C.A. No. 1:25-cv-00197

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

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

I. THE PARTIES

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

2. On information and belief, Defendant CoStar Realty Information, Inc. (“CoStar” or “Defendant”) is a corporation organized and existing under the laws of Delaware. Defendant has its principal place of business at 501 S 5th Street, Richmond, VA 23219. Defendant has a registered agent Corporation Service Company, at 100 Shockoe Slip Fl 2, Richmond, VA 23219.

II. JURISDICTION AND VENUE

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

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

its business in this forum, including at least a portion of the infringements alleged herein at 501 S 5th Street, Richmond, VA 23219.

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

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant has businesses in this district at 501 S 5th Street, Richmond, VA 23219. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

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

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

8. Plaintiff incorporates the above paragraphs herein by reference.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

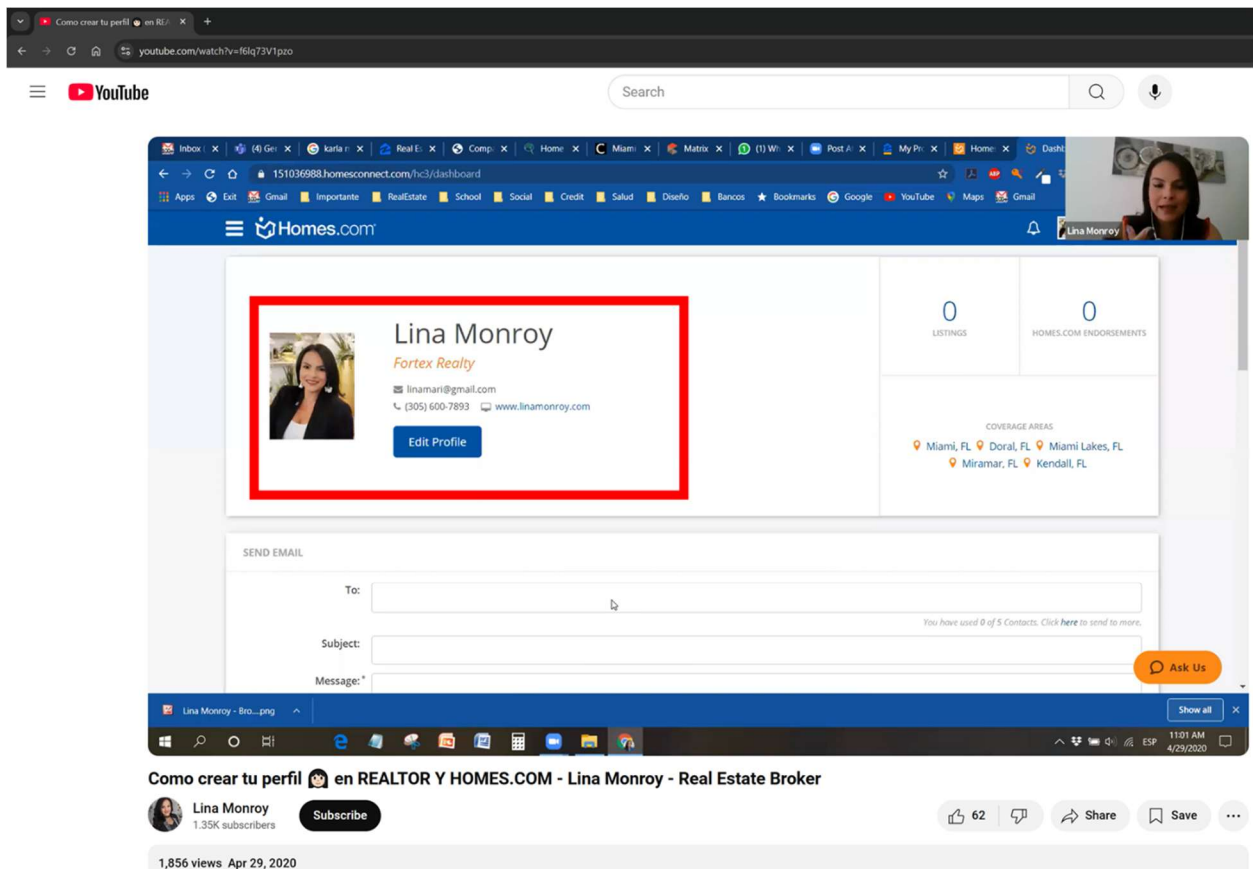
filter.” They also provide detail on how the “electronic filter” is “based at least in part on at least one of the one or more user attributes” and specifies that “the identification of the submitter is maintained with each selected and retrieved submission within the multimedia content.”

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

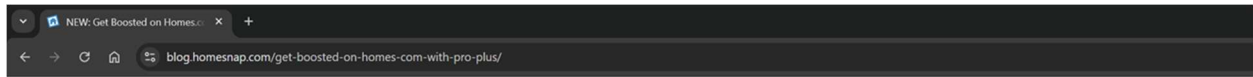
22. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claims 1, and 16 of the ‘480 Patent in Virginia, and elsewhere in the United States, by employing a computer-based system using <https://www.homes.com/> (“Accused Instrumentality”) (e.g., <https://www.homes.com/>).

23. CoStar uses a computer-based system for its Accused Instrumentality, to enable user-submitters to post electronic submissions in the form of real estate listings. The real estate listings contain multimedia content including textual content and image content as well as hyperlinks to other pages internal or external to Homes.com. The real estate listings and associated multimedia content may be shown to other users based on, *inter alia*, user attributes. CoStar’s System employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus in order to serve real estate listings with associated textual content and image content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. Users, such as real estate agents, may also create public profiles containing multimedia content, including textual and image content. For example, as shown below, multimedia content associated with real estate listings and user profiles is provided on various user devices (e.g., computers or other devices with a web browser or app) in response to a user logging in to the Accused

Instrumentality CoStar uses function-specific subsystems, for example as discussed below. CoStar, during the relevant time period, took advantage of multiple cloud server providers for the Accused Instrumentality, as discussed above, as well as scalability within its cloud server providers, employing separate server subsystems for all its meaningfully different functions. CoStar uses, and has used during the relevant time period, numerous different networks and providers for, *inter alia*, content management systems, web servers, web hosting, data centers, proxy certificates, SSL certificates, traffic analysis, advertising, and tagging, thereby using separate server subsystems for all its meaningfully different functions, such as those indicated below.



(E.g., <https://www.youtube.com/watch?v=f6lq73V1pzo>).



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 Victoria Francis Century21 Associate License #61321 Washington, DC (571) 483-5488 9 Reviews	 Oliver Lawson Rise DC Associate License #09645 Washington, DC (571) 483-7699 21 Reviews	 Kelly Pearson Compass Realty of Virginia Associate License #43587 Washington, DC (571) 483-1456 7 Reviews	 Margo Pence Keller Williams Realty Associate License #32166 Washington, DC (571) 483-6678 14 Reviews
 Dennis Price Peakmade Real Estate of Richmond Associate License #77655 Washington, DC (571) 483-5458 4 Reviews	 Terry Price RE/MAX Associate License #78545 Washington, DC (571) 483-1111 15 Reviews	 Roberta Rogers Keller Williams Richmond Associate License #65466 Washington, DC (571) 483-4567 17 Reviews	 Royce Buss Long & Foster OT Historic Associate License #45638 Washington, DC (571) 483-8743 14 Reviews

Showing Results 1 - 12, Page 1 of 89

1 2 3 4 5 Next

(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).



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but getting boosted means you have an enriched profile that shows your five-star Google reviews, review rating, Google posts, agent stories, photos, and business hours and information.

Tricia Battle
Fairfax Realty Georgetown
Real Estate Agent | License #633580, SP98377478
Washington, DC
5 ★★★★★ 29 Reviews
(202) 765-1922 | View My Listings

About Tricia Verified on Google PRO+

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Locations Served: Washington (DC), Rockville (MD), Olney (MD), Potomac (MD), Silver Spring (MD)

Languages: English

I've built a solid reputation for providing quality customer service to all buyers, sellers, investors and estates from beginning to end. In an ever-changing real estate market, it is especially important to have someone on your side who is passionate about what they do in order to guide you through every step of the way.

I am committed to the highest level of personal service and to meeting your real estate needs. I therefore feel it is imperative to stay up to date on the trends and changes happening right here in the D.C. Metropolitan area housing market.

I work hard every day to support my clients and attorneys in order to meet and exceed their real estate goals.

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- Local Expertise
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- Distressed Properties
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- Home Sellers
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- Luxury Homes
- Military
- Military Families
- New Construction
- Property Management
- Senior Communities
- Short Sales
- Time Share
- Timeshares
- Veteran's Programs

Business Hours:

- Open 24 Hours

1 Active Listing


1301 Delaware Ave SW #N711
\$136,000
Studio - 1 Bath - 600 Sq. Ft.
Washington, DC 20024

(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

The screenshot shows a YouTube video player displaying a real estate listing. The video content is a collage of images showing a modern apartment building and its amenities, including a rooftop terrace with outdoor furniture and a view of the city. Below the images, the listing details are provided:

- Price:** \$7,395,000
- Estimated Payment:** \$34,925/mo
- Address:** 121 East 22nd #5901, New York, NY 10010
- Features:** 4 Beds, 5 Baths, 2,553 Sq. Ft.
- Description:** Move In Ready New Home In 121 East 22nd Community. This new construction, quick move-in home is the "S901" plan by Toll Brothers, and is located in the community of The 121 East 22nd at 121 East 22nd #5901, New York, NY-10010. This Condominium inventory home is priced at \$7,395,000 and has 4 bedrooms, 4 baths, 1 half baths, is 2,553 square feet, and has a 1-car garage. The Builder
- Agent:** Toll Brothers Real Estate Agent (212) 300-4226

Below the video player, the YouTube interface shows the channel name "CodemanBD" with 58.4K subscribers, a "Subscribe" button, and engagement metrics: 21 likes, 0 comments, and 0 shares. The video has 1,005 views and was uploaded on August 9, 2021. The video title is "Homes.com | Find Real Estste Agents & Homes From Any Location | Lead Generation Bangla Tutorial".

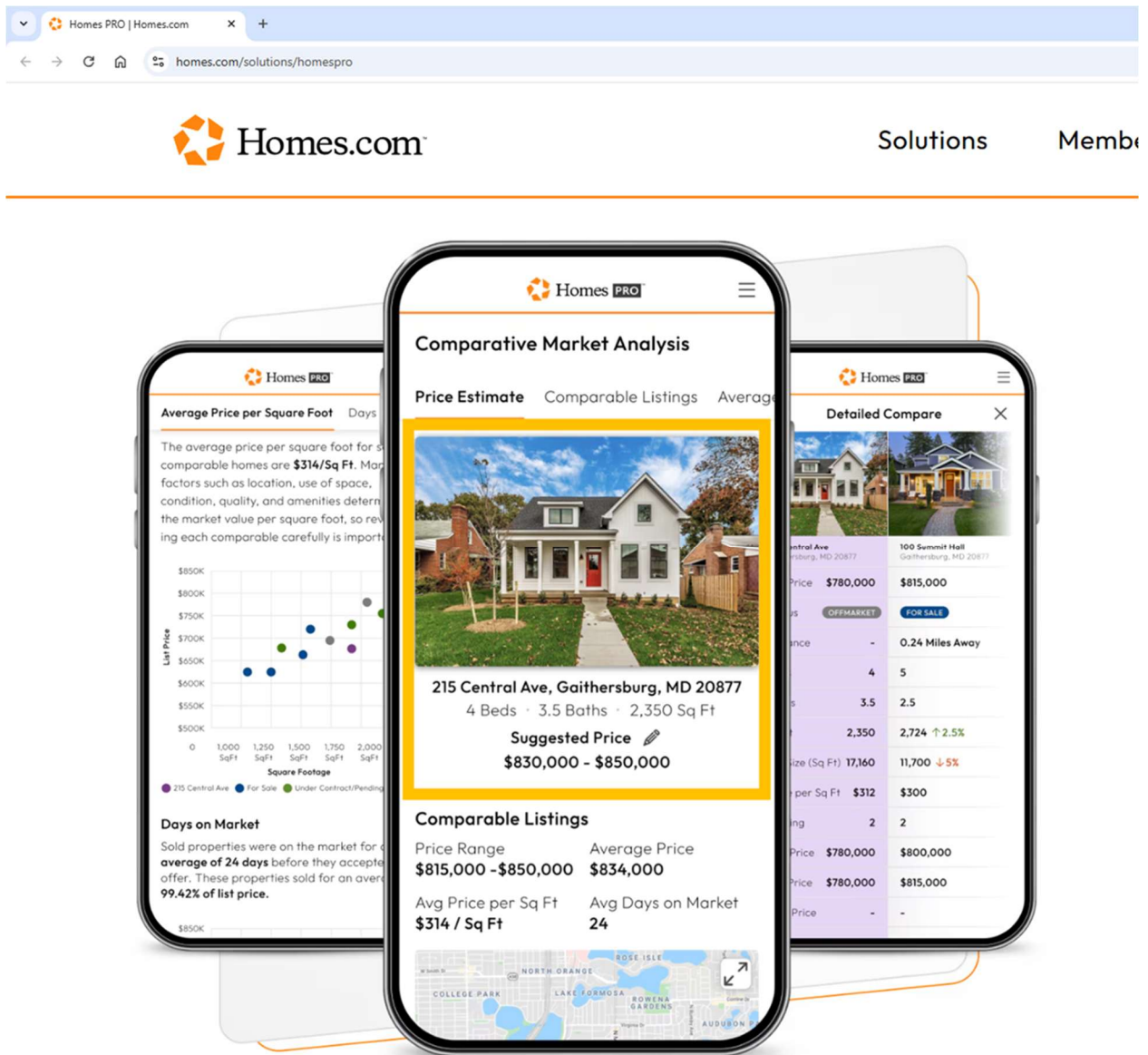
(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).

The screenshot displays a YouTube video player showing a real estate listing from Homes.com. The listing is for a "Luxurious 1-Bedroom Condo in New York" located at 482 Greenwich Street #2B, New York, NY 10013. The price is listed as \$1,250,000. The listing includes a "Request Info" button and a "Schedule a Tour" section with a calendar for August 9-13. The video player shows the channel "CodemanBD" with 58.4K subscribers and 1,005 views. The video title is "Homes.com | Find Real Estste Agents & Homes From Any Location | Lead Generation Bangla Tutorial".

(E.g., https://www.youtube.com/watch?app=desktop&v=81TCIXHa_rc).

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

to the Accused Instrumentality via a submissions electronic interface, e.g., a web-based content portal, accessible for example by logging in and selecting an option to upload such content or import content, configured to receive such electronic media, from a plurality of submitters (e.g., real estate agents or homeowners) over a public network (e.g., the Internet) and stored, via an uploading process, in said electronic media Listings database for use in distribution to other users of the Accused Instrumentality.



(E.g., <https://www.homes.com/solutions/homespro>).

Como crear tu perfil en REALTOR Y HOMES.COM - Lina Monroy - Real Estate Broker

Lina Monroy
1.35K subscribers

1,856 views Apr 29, 2020

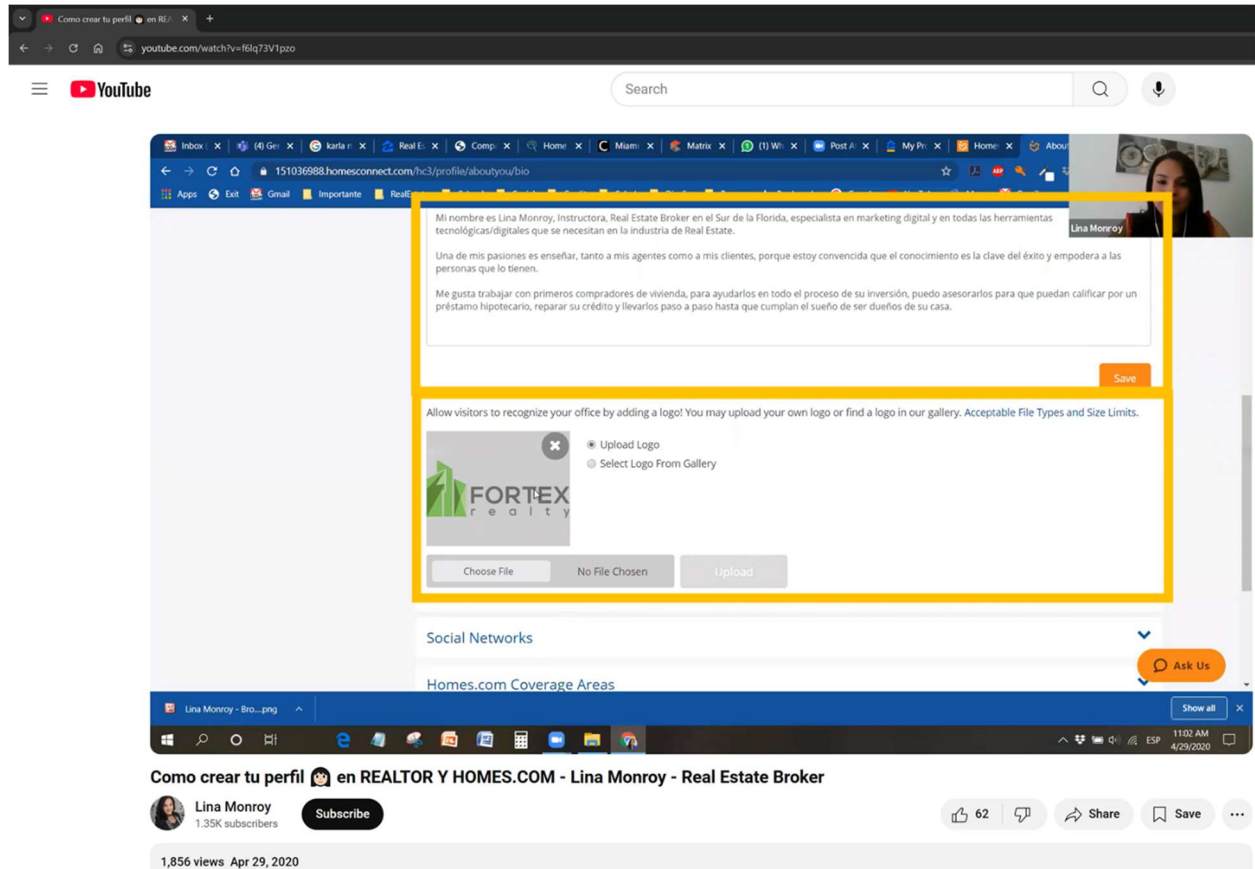
62 likes, Share, Save

Bio & Logo

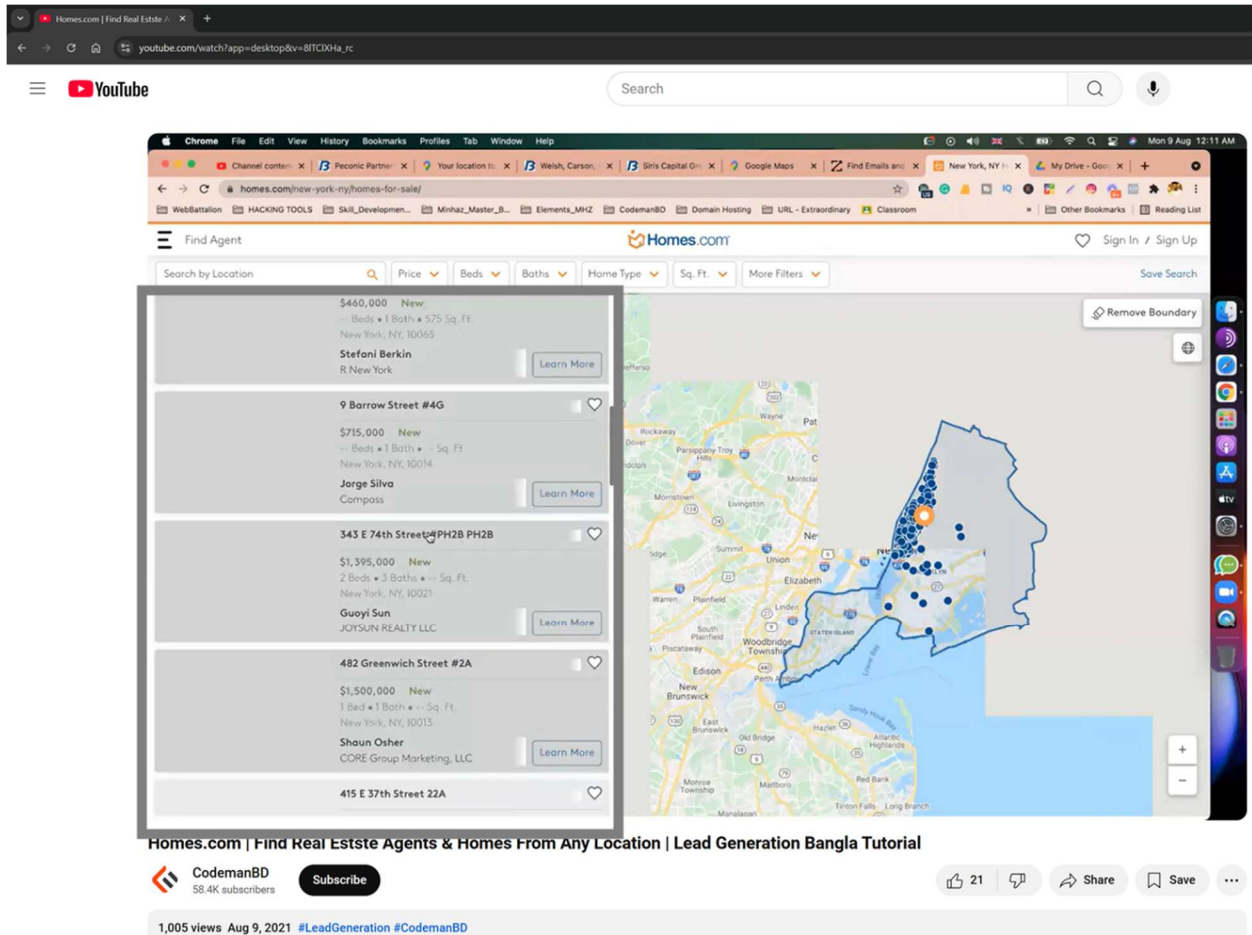
Headline
Lina Monroy - Real Estate Broker Miami

About You
Mi nombre es Lina Monroy, Instructora, Real Estate Broker en el Sur de la Florida, especialista en marketing digital y en todas las herramientas tecnológicas/digitales que se necesitan en la industria de Real Estate.
Una de mis pasiones es enseñar, tanto a mis agentes como a mis clientes, porque estoy convencida que el conocimiento es la clave del éxito y empodera a las personas que lo tienen.
Me gusta trabajar con primeros compradores de vivienda, para ayudarlos en todo el proceso de su inversión, puedo asesorarlos para que puedan calificar por un préstamo hipotecario, reparar su crédito y llevarlos paso a paso hasta que cumplan el sueño de ser dueños de su casa.

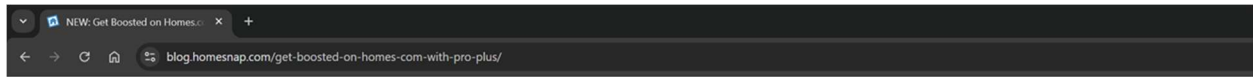
(E.g., <https://www.youtube.com/watch?v=f6lq73V1pzo>).



(E.g., <https://www.youtube.com/watch?v=f6lq73V1pzo>).

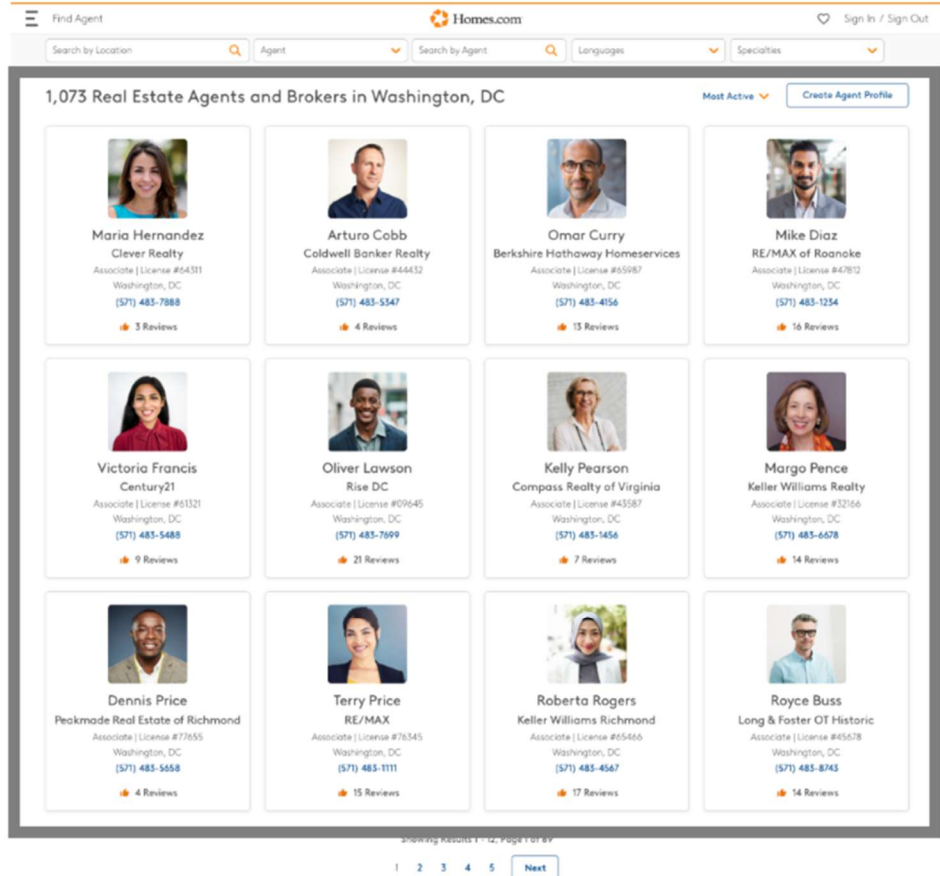


(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).



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(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

25. The electronic media submissions database of the Accused Instrumentality used by CoStar which stores the submissions further stores data identifying the submitter and data indicating content for each electronic media submission (e.g., a real estate listing). As shown below, data identifying the user-submitter includes, e.g., a name and an agency logo. Data indicating content for each electronic media submission includes photo and/or textual content pertaining to the real estate listing.

The screenshot shows a YouTube video player displaying a real estate listing. The video content includes several images of a modern apartment building and its rooftop terrace. The listing details are as follows:

\$7,395,000	Estimated Payment \$34,925/mo	4 Beds	5 Baths	2,553 Sq. Ft.	\$7,395,000
121 East 22nd #5901, New York, NY 10010					
Photos Map Street					
Move In Ready New Home In 121 East 22nd Community					
This new construction, quick move-in home is the "S901" plan by Toll Brothers, and is located in the community of The 121 East 22nd at 121 East 22nd #5901, New York, NY-10010. This Condominium inventory home is priced at \$7,395,000 and has 4 bedrooms, 4 baths, 1 half baths, is 2,553 square feet, and has a 1-car garage. The Builder					
Toll Brothers Real Estate Agent (212) 300-4226					

Below the video, the channel name "CodemanBD" with 58.4K subscribers is visible, along with a "Subscribe" button. The video has 21 likes and is titled "Homes.com | Find Real Estste Agents & Homes From Any Location | Lead Generation Bangla Tutorial". The video was viewed 1,005 times on August 9, 2021, with the hashtag #LeadGeneration #CodemanBD.

(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).

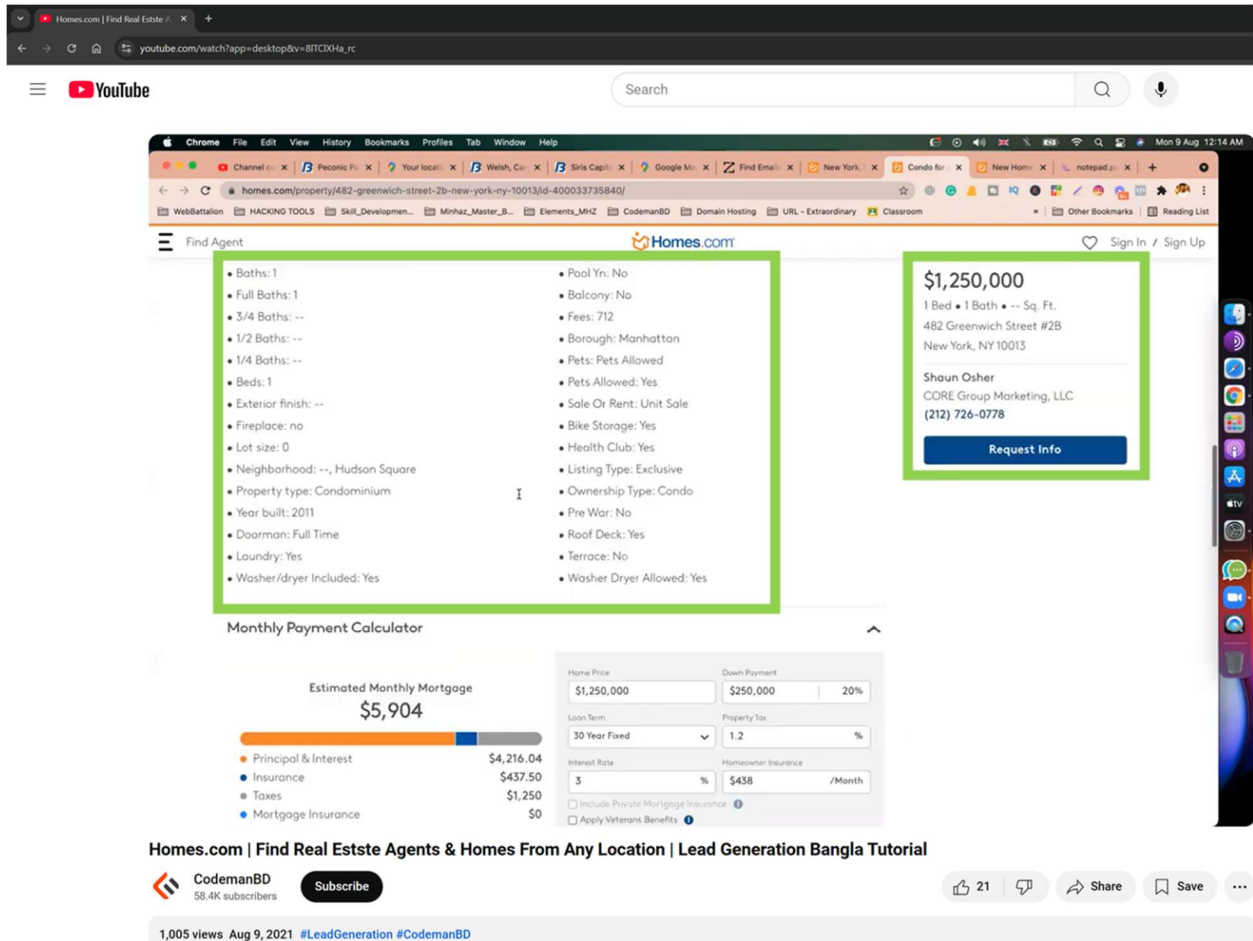
The screenshot shows a YouTube video player displaying a Homes.com real estate search interface. The video title is "Homes.com | Find Real Estste Agents & Homes From Any Location | Lead Generation Bangla Tutorial". The interface includes a search bar, filters for Price, Beds, Baths, Home Type, and Sq. Ft., and a list of real estate listings. The listings are highlighted with blue boxes, showing details such as price, number of beds and baths, square footage, and the agent's name. The map on the right shows a geographical area with several blue dots representing listings.

Price	Year	Beds	Baths	Sq. Ft.	Agent
\$460,000	New	1	1	575	Stefani Berkin, R New York
\$715,000	New	1	1	-	Jorge Silva, Compass
\$1,395,000	New	2	3	-	Guoyi Sun, JOYSUN REALTY, LLC
\$1,500,000	New	1	1	-	Shaun Osher, CORE Group Marketing, LLC

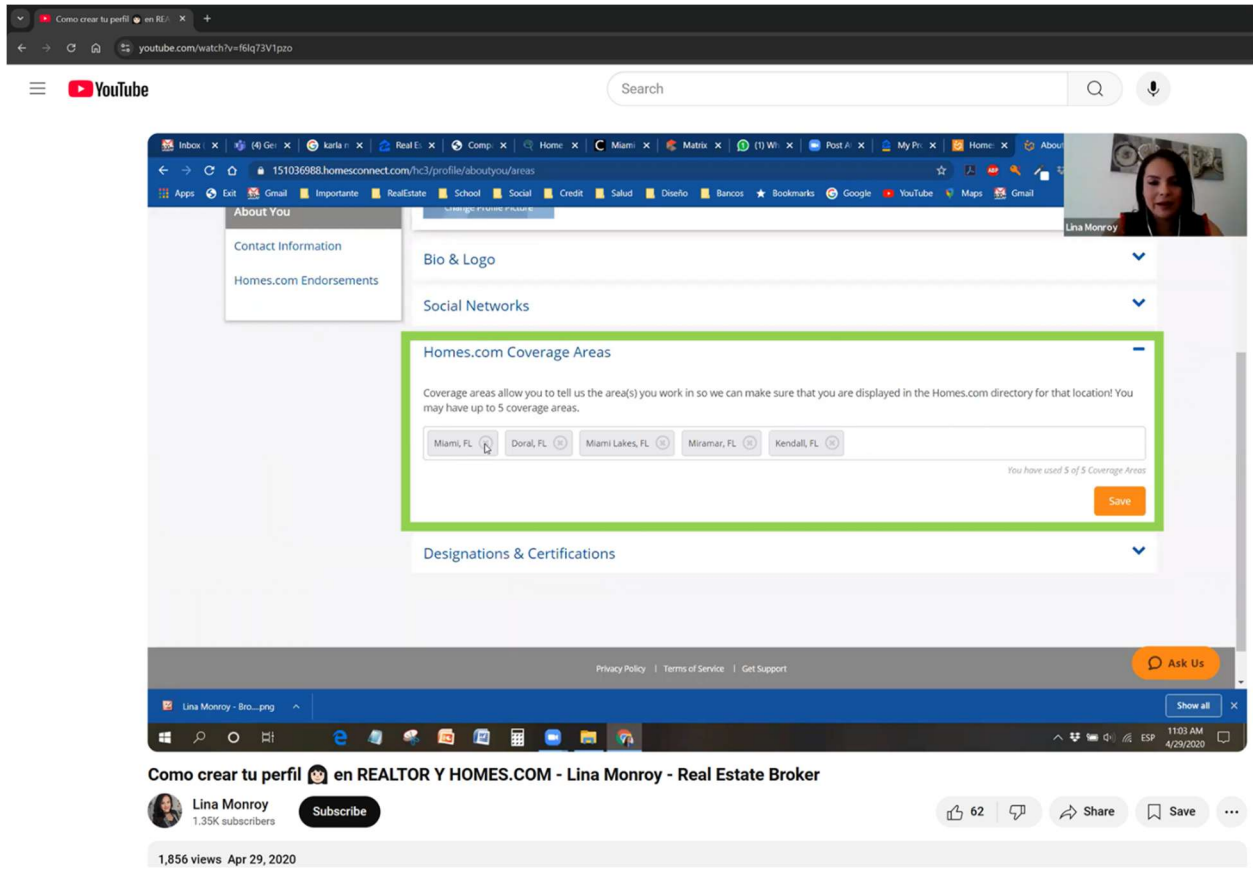
Video details: 1,005 views, Aug 9, 2021, #LeadGeneration #CodemanBD

(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).

26. Individual user-submitters can sign up and maintain a number of real estate listings, which are stored on a user database. Such user database is stored in memory available through the Accused Instrumentality, for example as discussed above. User attributes selected by users pertaining to the real estate listings, contained on the user database, may include *e.g.*, price, year build, bed and bath count, amenities, and the like, as shown in the example below. Users may also select user attributes pertaining to the real estate agent such as coverage area/region as shown below.



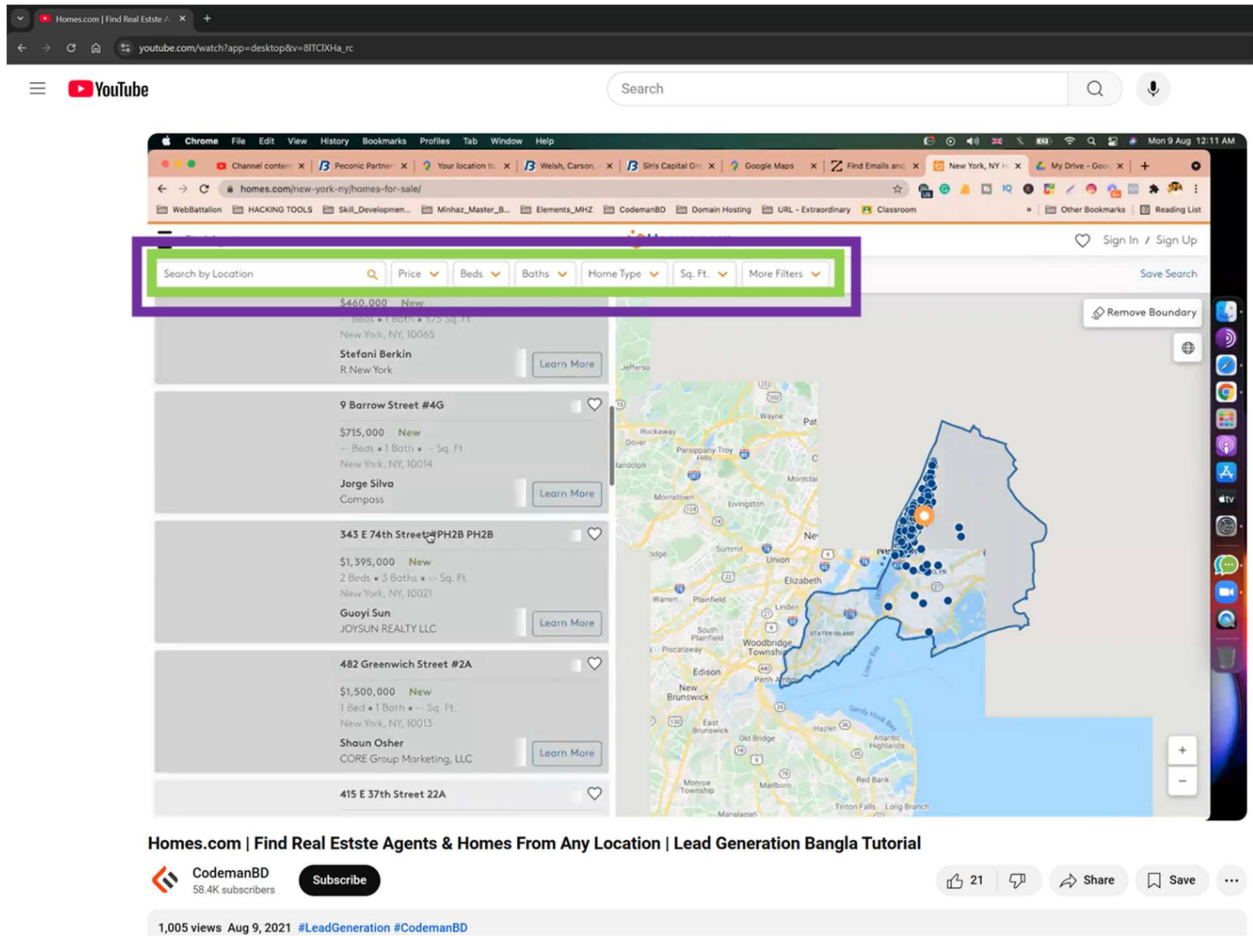
(E.g., https://www.youtube.com/watch?v=8ITCIXHa_rc).



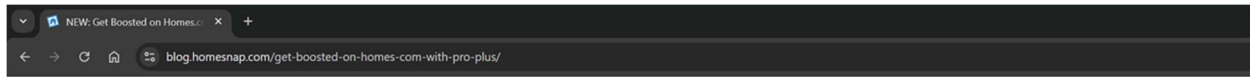
(E.g., <https://www.youtube.com/watch?v=f6lq73V1pzo>).

27. The Accused Instrumentality employs an electronic multimedia creator server subsystem operatively coupled to the electronic media submissions server subsystem, necessarily having one or more data processing apparatus in order to manage content, and an electronic creator multimedia database stored on a non-transitory medium, configured to select and retrieve a plurality of electronic media submissions (e.g., real estate listings with associated photo content and textual content) from the electronic media submissions database using an electronic content filter located on the electronic multimedia creator server. As can be seen below, such electronic content filter as is used by CoStar is based at least in part on at least one of the one or more user attributes selected by the user (e.g., price, year build, bed and bath count, amenities, and the like,

or coverage area/region), which in turn affect which electronic media submissions, and associated media, appear to the user, as shown and discussed for example below.

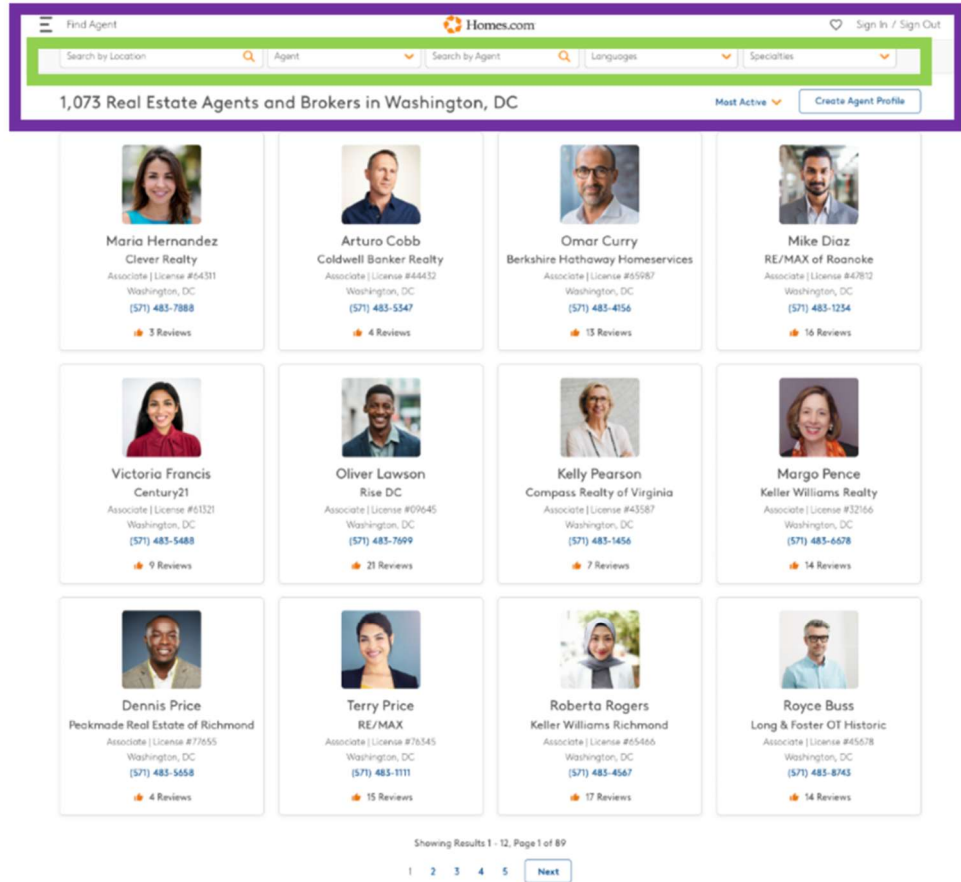


(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).



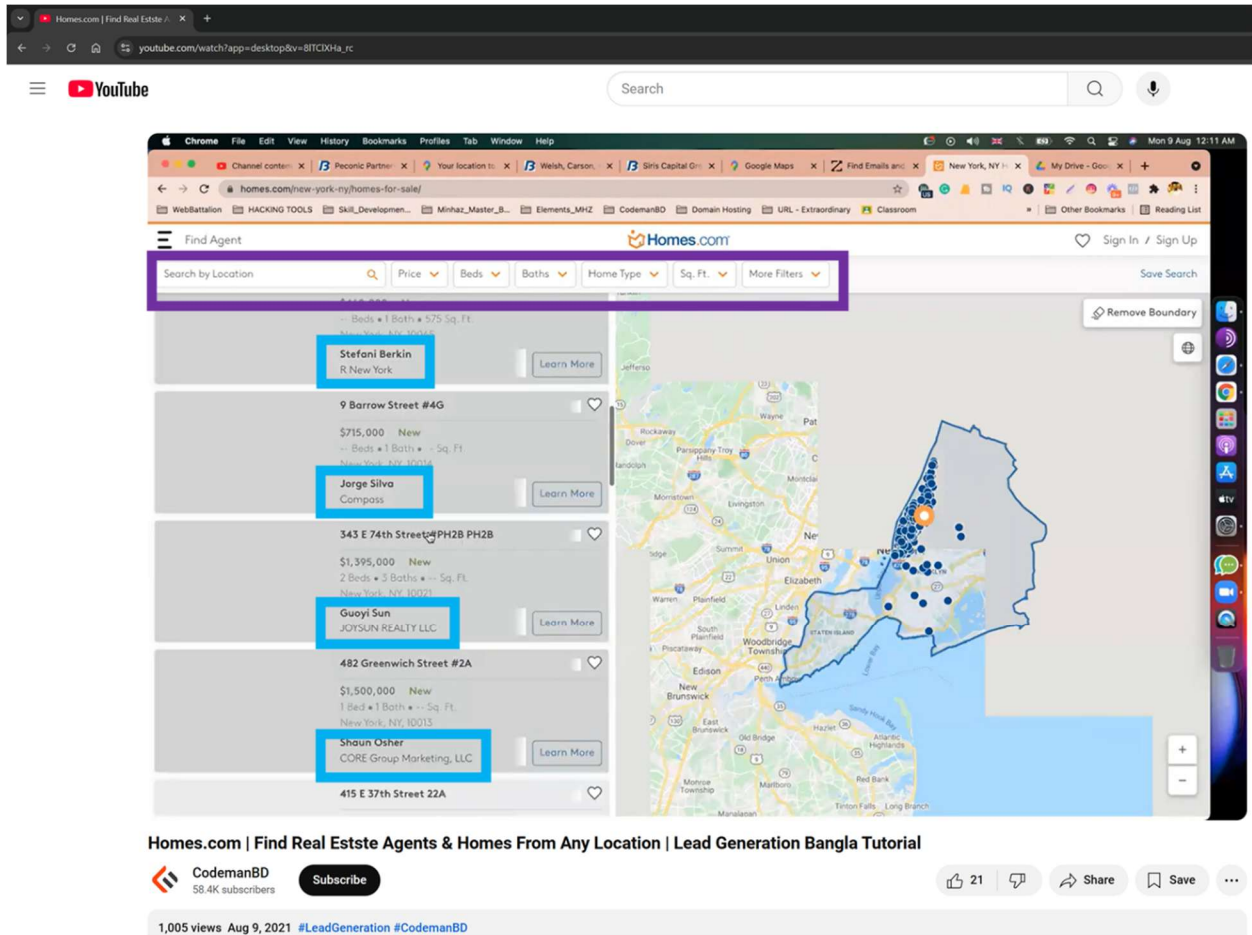
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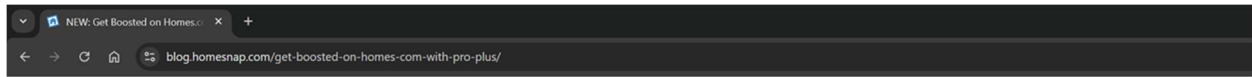


(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

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

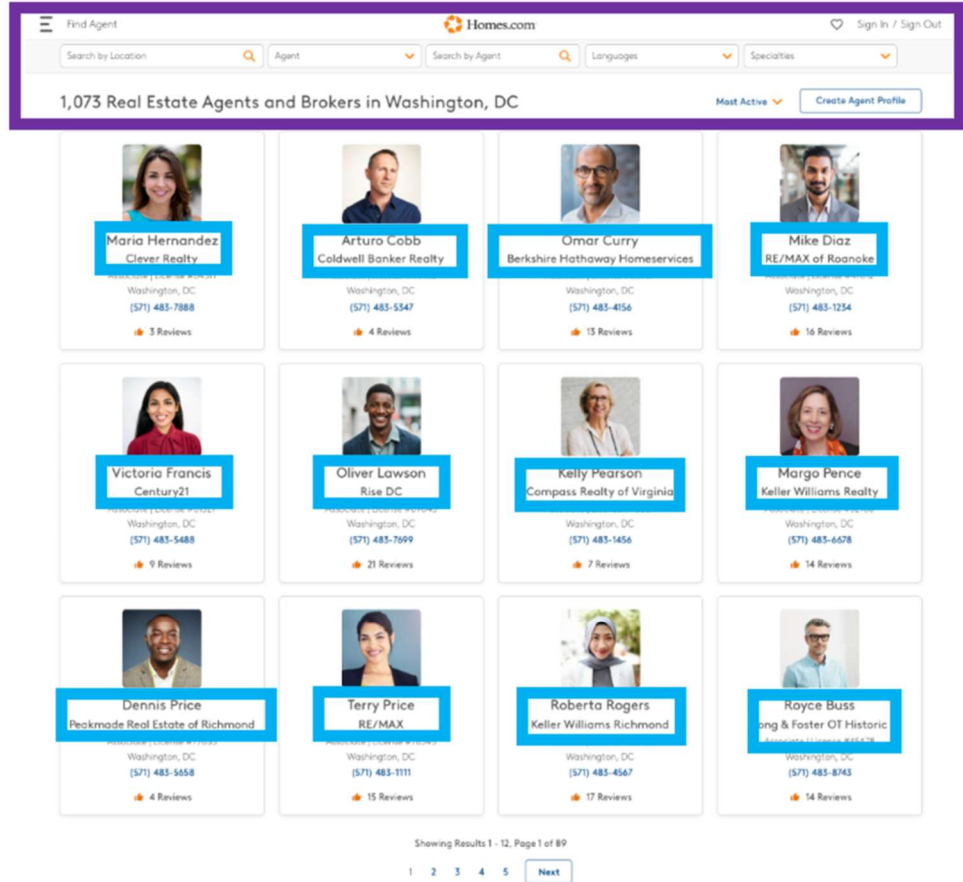


(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).



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much nurturing on your end.

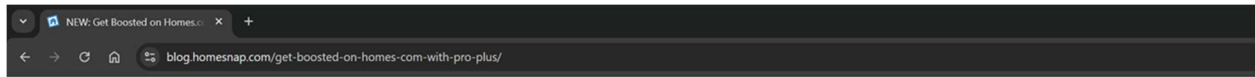


(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).

29. The Accused Instrumentality having one or more data processing apparatus in order to serve real estate listings with associated photo and textual content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. CoStar uses function-specific subsystems, for example as discussed below.

The screenshot displays a YouTube video player. The video content is a screen recording of a web browser showing the profile of Lina Monroy on the Homes.com website. The profile is highlighted with a red rectangular border. The profile information includes a profile picture, the name "Lina Monroy", the company "Fortex Realty", and contact details: "linamari@gmail.com", "(305) 600-7893", and "www.linamonroy.com". There is an "Edit Profile" button. To the right of the profile, statistics show "0 LISTINGS" and "0 HOMES.COM ENDORSEMENTS". Below these are "COVERAGE AREAS" listed as Miami, FL; Doral, FL; Miami Lakes, FL; Miramar, FL; and Kendall, FL. At the bottom of the profile section is a "SEND EMAIL" form with fields for "To:", "Subject:", and "Message:". The video player interface shows the video title "Como crear tu perfil en REALTOR Y HOMES.COM - Lina Monroy - Real Estate Broker", the channel name "Lina Monroy" with "1.35K subscribers", and a "Subscribe" button. Engagement metrics include "62" likes, "0" comments, and "Share" and "Save" options. The video has "1,856 views" and was posted on "Apr 29, 2020".

(E.g., <https://www.youtube.com/watch?v=f6lq73V1pzo>).



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1,073 Real Estate Agents and Brokers in Washington, DC

 Maria Hernandez Clever Realty Associate License #64531 Washington, DC (571) 483-7888 3 Reviews	 Arturo Cobb Coldwell Banker Realty Associate License #44452 Washington, DC (571) 483-5547 4 Reviews	 Omar Curry Berkshire Hathaway Homeservices Associate License #95987 Washington, DC (571) 483-4156 13 Reviews	 Mike Diaz RE/MAX of Roanoke Associate License #47812 Washington, DC (571) 483-1254 16 Reviews
 Victoria Francis Century21 Associate License #61321 Washington, DC (571) 483-5488 9 Reviews	 Oliver Lawson Rise DC Associate License #09645 Washington, DC (571) 483-7699 21 Reviews	 Kelly Pearson Compass Realty of Virginia Associate License #45587 Washington, DC (571) 483-1456 7 Reviews	 Margo Pence Keller Williams Realty Associate License #32166 Washington, DC (571) 483-6678 14 Reviews
 Dennis Price Peakmade Real Estate of Richmond Associate License #77655 Washington, DC (571) 483-5458 4 Reviews	 Terry Price RE/MAX Associate License #78545 Washington, DC (571) 483-1111 15 Reviews	 Roberta Rogers Keller Williams Richmond Associate License #65466 Washington, DC (571) 483-4567 17 Reviews	 Royce Buss Long & Foster OT Historic Associate License #45638 Washington, DC (571) 483-8743 14 Reviews

Showing Results 1 - 12, Page 1 of 89

1 2 3 4 5 Next

(E.g., <https://blog.homesnap.com/get-boostered-on-homes-com-with-pro-plus/>).



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but getting boosted means you have an enriched profile that shows your five-star Google reviews, review rating, Google posts, agent stories, photos, and business hours and information.

Tricia Battle
Fairfax Realty Georgetown
Real Estate Agent | License #633580, SP98377478
Washington, DC
5 ★★★★★ 29 Reviews
(202) 765-1922 | View My Listings

About Tricia Verified on Google PRO+

Let Trish Battle YOUR Real Estate Needs Today!

Locations Served: Washington (DC), Rockville (MD), Olney (MD), Potomac (MD), Silver Spring (MD)

Languages: English

I've built a solid reputation for providing quality customer service to all buyers, sellers, investors and estates from beginning to end. In an ever-changing real estate market, it is especially important to have someone on your side who is passionate about what they do in order to guide you through every step of the way.

I am committed to the highest level of personal service and to meeting your real estate needs. I therefore, feel it is imperative to stay up to date on the trends and changes happening right here in the D.C Metropolitan area housing market.

I work hard every day to support my clients and attorneys in order to meet and exceed their real estate goals.

Let Trish Battle YOUR Real Estate Needs Today!


Specializations:

- Communication
- Local Expertise
- Professionalism
- 1031 Tax Exchange
- Distressed Properties
- Foreclosures
- First Time Homebuyers
- Fixer-Uppers
- Home Buyers
- Home Sellers
- Investments
- Luxury Homes
- Military
- Military Families
- New Construction
- Property Management
- Senior Communities
- Short Sales
- Time Share
- Timeshares
- Veteran's Programs

Business Hours:

- Open 24 Hours

1 Active Listing


1301 Delaware Ave SW #N711
\$136,000
Studio + 1 Bath + 600 Sq. Ft.
Washington, DC 20024

(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

The screenshot displays a YouTube video player showing a real estate listing on the Homes.com website. The listing is for a property at 121 East 22nd, New York, NY 10010. The price is \$7,395,000, with an estimated monthly payment of \$34,925. The property features 4 bedrooms, 5 bathrooms, and 2,553 square feet of space. The listing includes several photos: a large rooftop terrace with a dining table and chairs, a modern kitchen with a bar, and a living area. The text below the photos describes the property as a 'Move In Ready New Home In 121 East 22nd Community' and provides details about the building and the listing agent, Toll Brothers. The video is from the channel 'CodemanBD' and has 1,005 views as of August 9, 2021.

(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

The screenshot displays a YouTube video player showing a real estate listing from Homes.com. The listing is for a "Luxurious 1-Bedroom Condo in New York" located at 482 Greenwich Street #2B, New York, NY 10013. The price is listed as \$1,250,000. The listing includes a "Request Info" button and a "Schedule a Tour" section with a calendar for August 9-13. The video is from the channel "CodemanBD" and has 1,005 views as of August 9, 2021.

(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

30. The Accused Instrumentality employs an electronic voting subsystem, necessarily having one or more data processing apparatus in order to track voting or electronic rating, configured to enable a user to electronically vote for or rate an electronically available multimedia content (e.g., a real estate listing), e.g., by the user's choices with respect to a selection of a Heart/Favorite button. Users may also endorse or post a review for electronically available real estate agent profiles. CoStar uses function-specific subsystems, for example as discussed below.

The screenshot displays a YouTube video player showing a desktop view of the Homes.com real estate website. The website interface includes a search bar, navigation tabs (Price, Beds, Baths, Home Type, Sq. Ft., More Filters), and a list of property listings. Three listings are highlighted with red boxes:

- 9 Barrow Street #4G**: \$460,000 New, 1 Bed + 1 Bath + 575 Sq. Ft., New York, NY, 10065. Agent: Stefani Berkin, R New York.
- 345 E 74th Street PH2B PH2B**: \$715,000 New, 2 Beds + 3 Baths + Sq. Ft., New York, NY, 10021. Agent: Guoyi Sun, JOYSUN REALTY LLC.
- 482 Greenwich Street #2A**: \$1,395,000 New, 1 Bed + 1 Bath + Sq. Ft., New York, NY, 10013. Agent: Shaun Osher, CODE Group Marketing, LLC.

The video player shows the channel name 'CodemanBD' with 58.4K subscribers, 21 likes, and 1,005 views from August 9, 2021. The video title is 'Homes.com | Find Real Estste Agents & Homes From Any Location | Lead Generation Bangla Tutorial'.

(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).

The screenshot displays a YouTube video player showing a webpage from Homes.com. The webpage is titled "Find Agent" and lists various real estate agents. Three agent profiles are highlighted with red rectangular boxes:

- Brian Silvestry**: Broker/Owner | License #37510866357 | BSRG Inc. | New York, NY | (347) 620-7134 | 17 Endorsements
- Julie Thum**: Real Estate Associate Broker | License #307H0698786 | Real Estate Office | New York, NY | (646) 698-8323 | 2 Endorsements
- Lawrence Cagno**: Broker | License #35HA0850489 | Outreach Real Estate | New York, NY | (929) 229-1548 | 1 Endorsement

Other agents visible include David Field, Ron Harris, Jack Yao, Michael Charles, Us Treasury Dept. Real Estat..., Lee Presser, and Brian Phillips. The video player interface shows 21 likes, 1,005 views, and the video was uploaded on Aug 9, 2021. The channel is CodemanBD with 58.4K subscribers.

(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).

The screenshot displays a YouTube video player with a browser window in the background. The browser shows the URL https://www.youtube.com/watch?v=8ITCIXHa_rc and the page content from Homes.com. The real estate listing features several images of a modern apartment building and its rooftop terrace. The listing details are as follows:

\$7,395,000	Estimated Payment \$34,925/mo	4 Beds	5 Baths	2,553 Sq. Ft.	\$7,395,000
121 East 22nd #5901, New York, NY 10010					
Photos Map Street					
Move In Ready New Home In 121 East 22nd Community					
This new construction, quick move-in home is the "S901" plan by Toll Brothers, and is located in the community of The 121 East 22nd at 121 East 22nd #5901, New York, NY-10010. This Condominium inventory home is priced at \$7,395,000 and has 4 bedrooms, 4 baths, 1 half baths, is 2,553 square feet, and has a 1-car garage. The Builder					
Toll Brothers Real Estate Agent (212) 300-4226					
Request Info					

Below the listing, the video player shows the channel name 'CodemanBD' with 58.4K subscribers and a 'Subscribe' button. The video has 21 likes, 0 comments, and 1,005 views. The video title is 'Homes.com | Find Real Estste Agents & Homes From Any Location | Lead Generation Bangla Tutorial'.

(E.g., https://www.youtube.com/watch?v=8ITCIXHa_rc).



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but getting boosted means you have an enriched profile that shows your five-star Google reviews, review rating, Google posts, agent stories, photos, and business hours and information.

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I am committed to the highest level of personal service and to meeting your real estate needs. I, therefore, feel it is imperative to stay up to date on the trends and changes happening right here in the D.C. Metropolitan area housing market.
I work hard every day to support my clients and attorneys in order to meet and exceed their real estate goals.
Let Trish Battle YOUR Real Estate Needs Today!

Specializations:

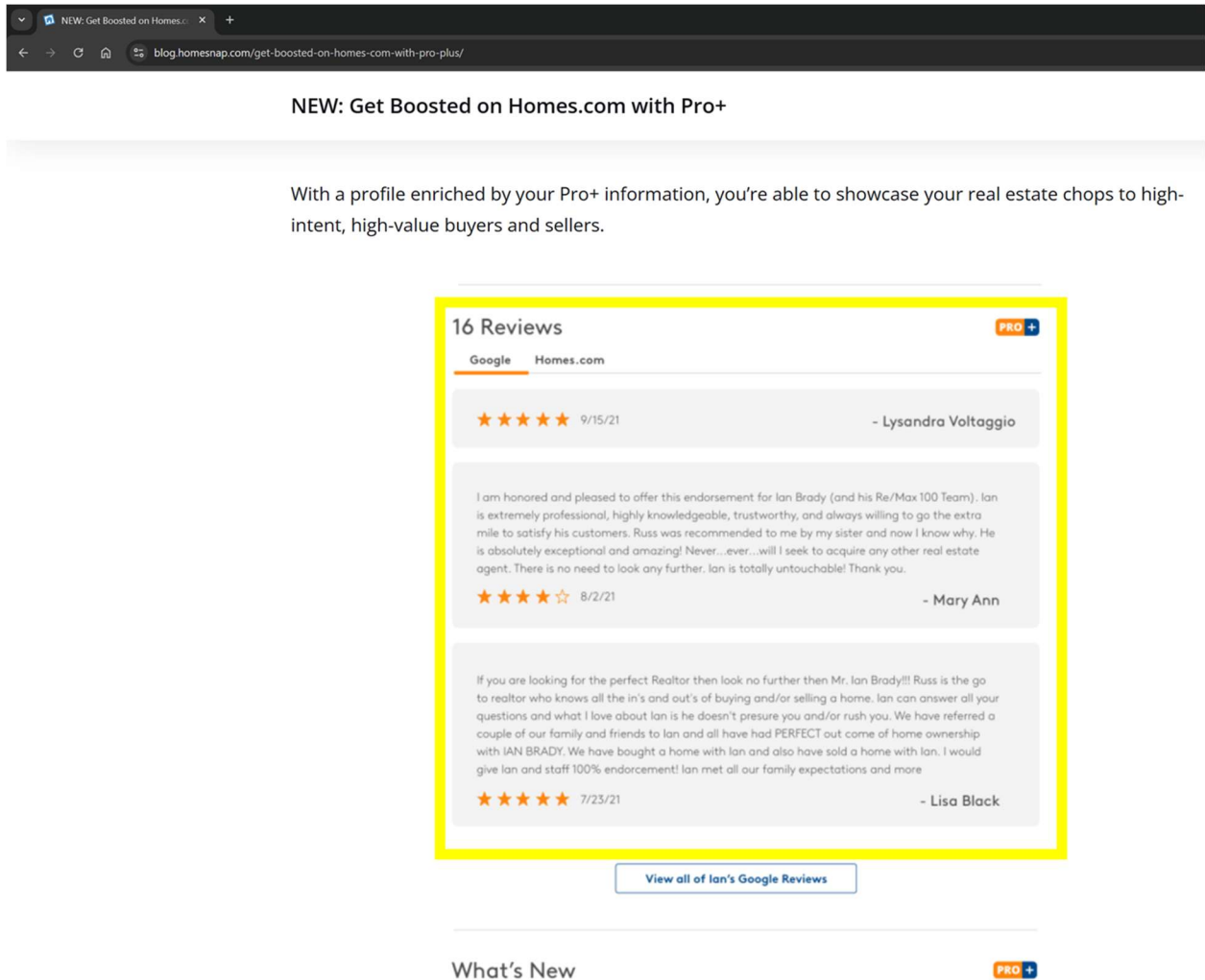
- Communication
- Local Expertise
- Professionalism
- 1031 Tax Exchange
- Distressed Properties
- Foreclosures
- First Time Homebuyers
- Fixer-Uppers
- Home Buyers
- Home Sellers
- Investments
- Luxury Homes
- Military
- Military Families
- New Construction
- Property Management
- Senior Communities
- Short Sales
- Time Share
- Timeshares
- Veteran's Programs

Business Hours:
• Open 24 Hours

Contact Tricia
Name*
Email*
Phone*
Message
Send Message

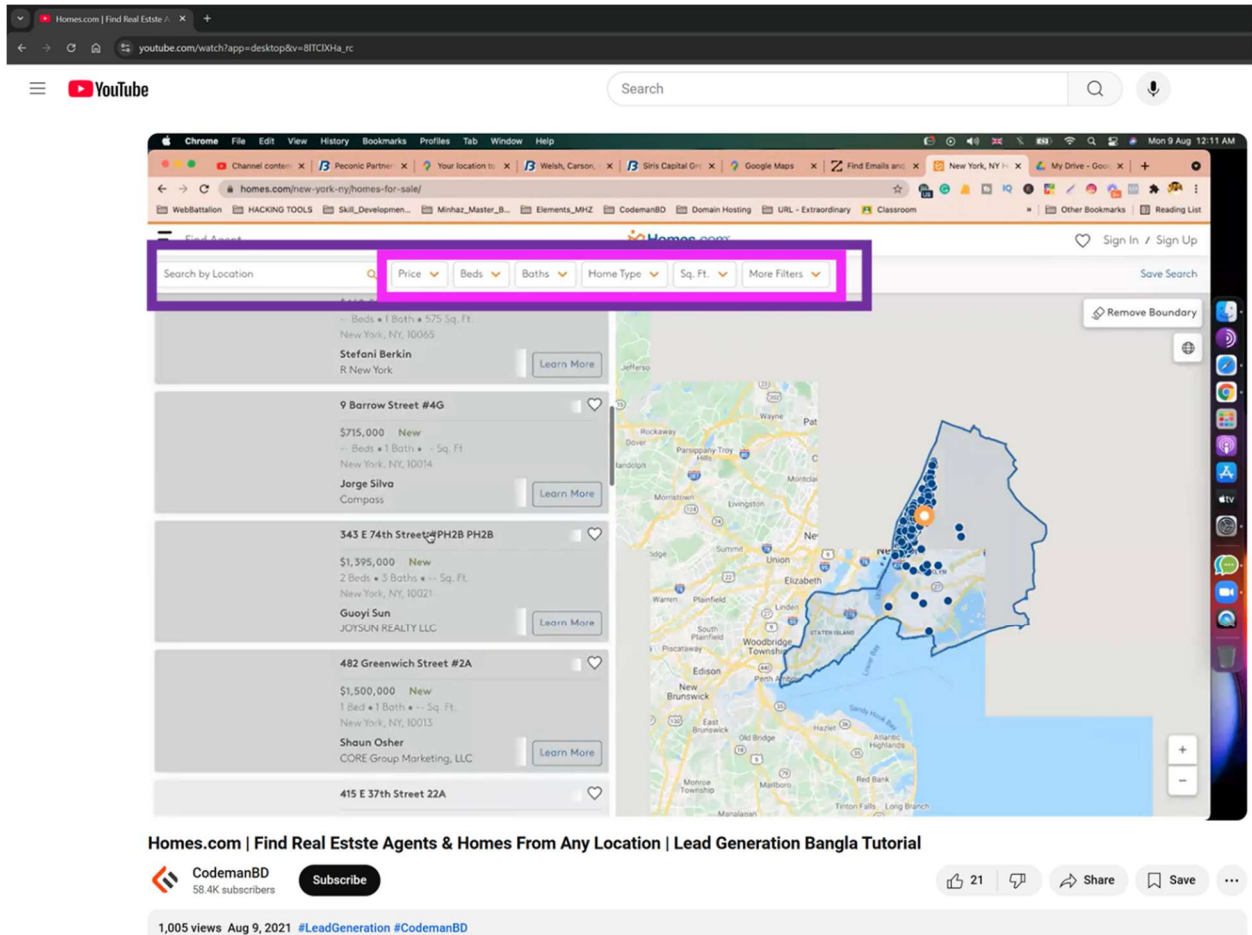
1301 Delaware Ave SW #N711
\$136,000
Studio + 1 Bath + 600 Sq. Ft.
Washington, DC 20024

(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

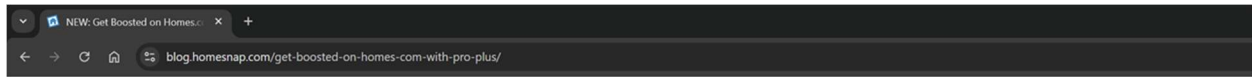


(E.g., <https://blog.homesnap.com/get-boosted-on-homes-com-with-pro-plus/>).

31. The Accused Instrumentality enables the electronic content filter to include criteria identifying defined by Boolean logic. As can be shown below, the user selection of a predetermined criteria necessarily narrows the media submissions by the submissions that either match or do not match the criteria selected by the user.

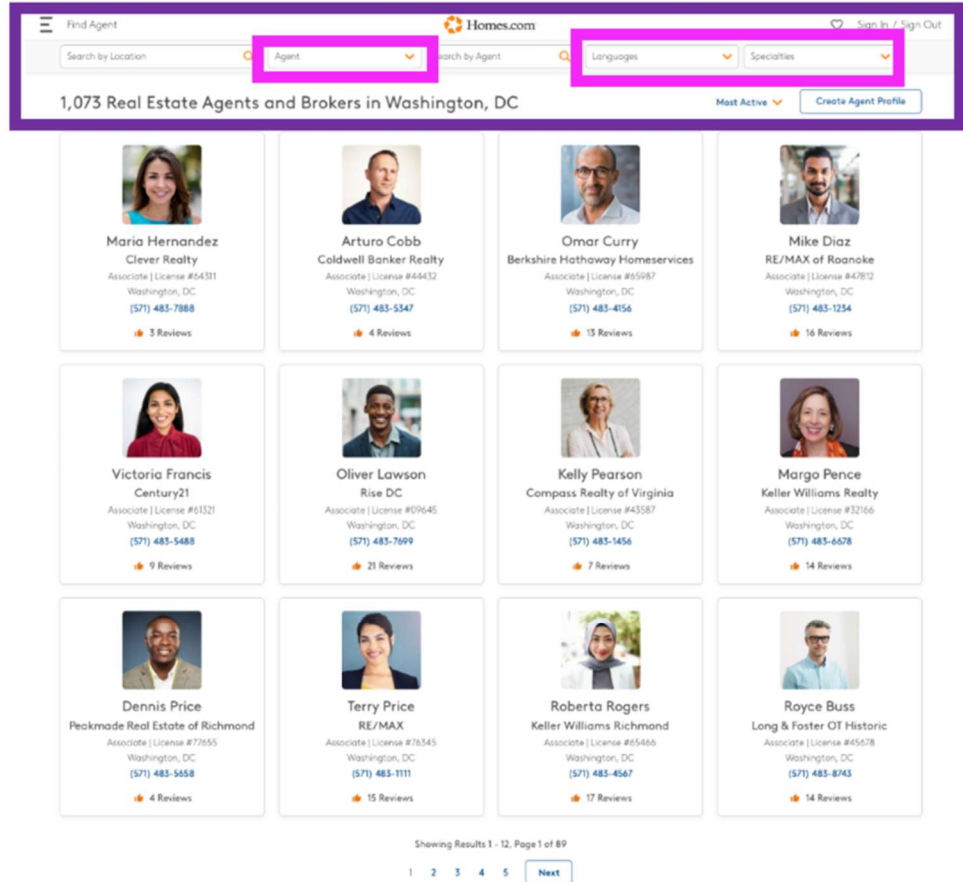


(E.g., https://www.youtube.com/watch?app=desktop&v=8ITCIXHa_rc).



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much nurturing on your end.



(E.g., <https://blog.homesnap.com/get-boostered-on-homes-com-with-pro-plus/>).

32. Plaintiff has been damaged as a result of Defendant’s infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant’s infringement of the ‘480 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

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

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

34. Plaintiff incorporates the above paragraphs herein by reference.

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

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

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

38. The ‘665 Patent shares the identical specification as the ‘480 patent and therefore VCA incorporates the background and discussion of the invention in Paragraphs 11-18. Furthermore claim 1 involves a system for generating multimedia content. The claim requires, among other things, electronically generating a multimedia file from the retrieved electronic media Submissions in accordance with a selected digital format, wherein the identification of the submitter is maintained with each retrieved submission within the multimedia file. The claim requires electronically transmitting the multimedia file to a plurality of publicly accessible

webservers to be electronically available for viewing on one or more user devices over a public network via a web-browser and. This allows electronically transmit data indicating votes or rating of multimedia content in a much quicker and easier fashion based on specific user criteria. There is nothing abstract about this very particular, unconventional, and non-routine system for the generation of multimedia content as specifically claimed and there is no risk of preempting creating and distribution contention generally, or even within the context of the Internet.

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

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

40. Each of these subsystems are configured in a very specific (and not generic, unconventional and non-routine manner to offer the novel and non-obvious approach claimed invention. For example, claim 1 requires an “electronic media submissions database,” which is a subsystem that receives media submissions from Internet users. This is not a generic database but rather a scalable database that must be able to receive, store, and manage multiple petabytes of multimedia data received from users all over the world. This is one of the many specialized databased required in the claim. In fact, the specification discloses the use of a sophisticated database management system known in the art at the time that was capable of handling data at this

level, Oracle7. This type of database management system cannot operate on a generic computing system but rather requires specialized hardware and software.

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

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

43. The claims also require “providing a web-based graphical user interface that enables a user to electronically transmit data indicating a vote or rating for an electronically available multimedia content or an electronic media Submission within a respective electronically available multimedia content,” which is a well-defined, specific, and unconventional feature. By including this additional voting/rating feature, the claims avoid any risk of preempting the creation and distribution of content.

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

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

46. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claims 1, 3, and 16 of the '665 Patent in Virginia, and elsewhere in the United States, by employing a computer-based system using <https://www.homes.com/> ("Accused Instrumentality") (e.g., <https://www.homes.com/>).

47. CoStar uses a computer-based system for its Accused Instrumentality, to enable user-submitters to create public profiles (such as an Agent profile associated with a real estate agent). Individual users may also post electronic submissions in the form of real estate listings. Each of the public profiles and the real estate listings contain multimedia content including textual content and image content as well as hyperlinks to other pages internal or external to Realtor.com. The real estate listings and associated multimedia content may be shown to other users based on, *inter alia*, user attributes. CoStar's System employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more

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

The screenshot shows a YouTube video player interface. At the top, there are browser tabs for 'realtor.com tutorial - YouTube' and 'The New realtor.com - the Home of Home Search'. The address bar shows 'youtube.com/watch?v=JDBmQzV5ys8'. The YouTube logo and a search bar are visible. The video content is a red background with the text 'Streamlined navigation...' and a magnifying glass icon over a house. A smartphone displays the realtor.com app interface with a property listing for \$437,000 at 4567 Crest Ave. Below the video, the title 'The New realtor.com - the Home of Home Search' is displayed. The channel name 'Realtor.com' with 75.6K subscribers and a 'Subscribe' button are shown. Engagement icons for likes (396), comments, share, and save are present. The video statistics show 135,437 views on Oct 10, 2018, with hashtags #realtor and #realestate.

Realtor.com® Real Estate - Homes for Sale and Rentals App

Streamlined navigation...

John Smith with Legends & Luxurious Realty

For Sale - Active

\$437,000

4567 Crest Ave

3 2 1,914 6,162

How much home can you afford?

135,437 views Oct 10, 2018 #realtor #realestate

(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).

More about this property

Your Name
Email
Phone

I'm interested in 4567 Crest Ave

Get pre-approved by a lender.

Contact Agent

By sending a request you agree to our Privacy Policy

\$437,000 Est. Payment \$1,784/mo
4567 Crest Ave, Austin, TX 78738
3 beds 2 baths 1,914 sq ft 6,102 sqft lot

Property Type: Single Family Home **Stop on Realtor.com** 7 hours
Price per sqft: \$225 Style: Two Entry Year Built: 1989 Status: Active

Ask a question Share

Open Houses

Next >
\$499K 3 bd

Immediately see when the home was added

Subscribe

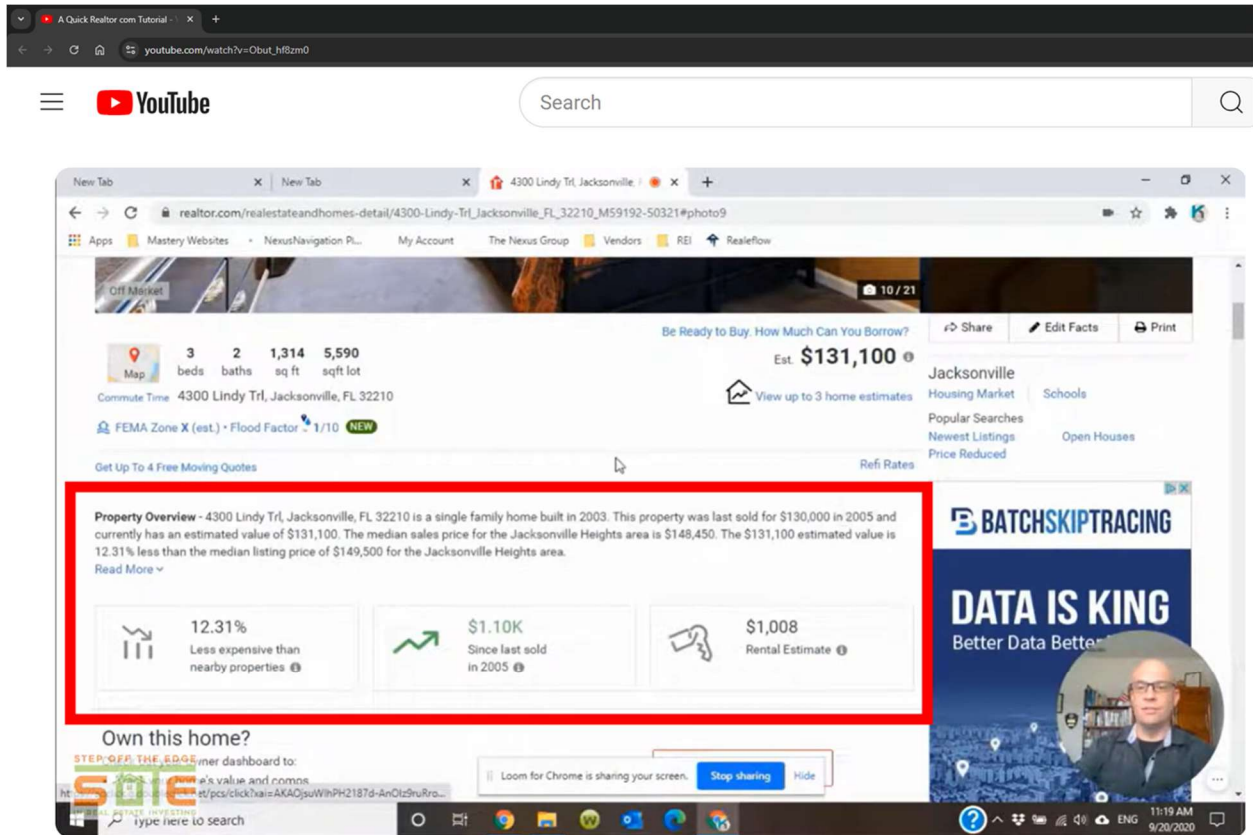
The New realtor.com - the Home of Home Search

Realtor.com
75.6K subscribers **Subscribe**

396 Comments Share Save ...

135,437 views Oct 10, 2018 #realtor #realestate

(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).



A Quick Realtor com Tutorial



Step Off The Edge With Kim Cerrato
67 subscribers

Subscribe

9



Share

Save

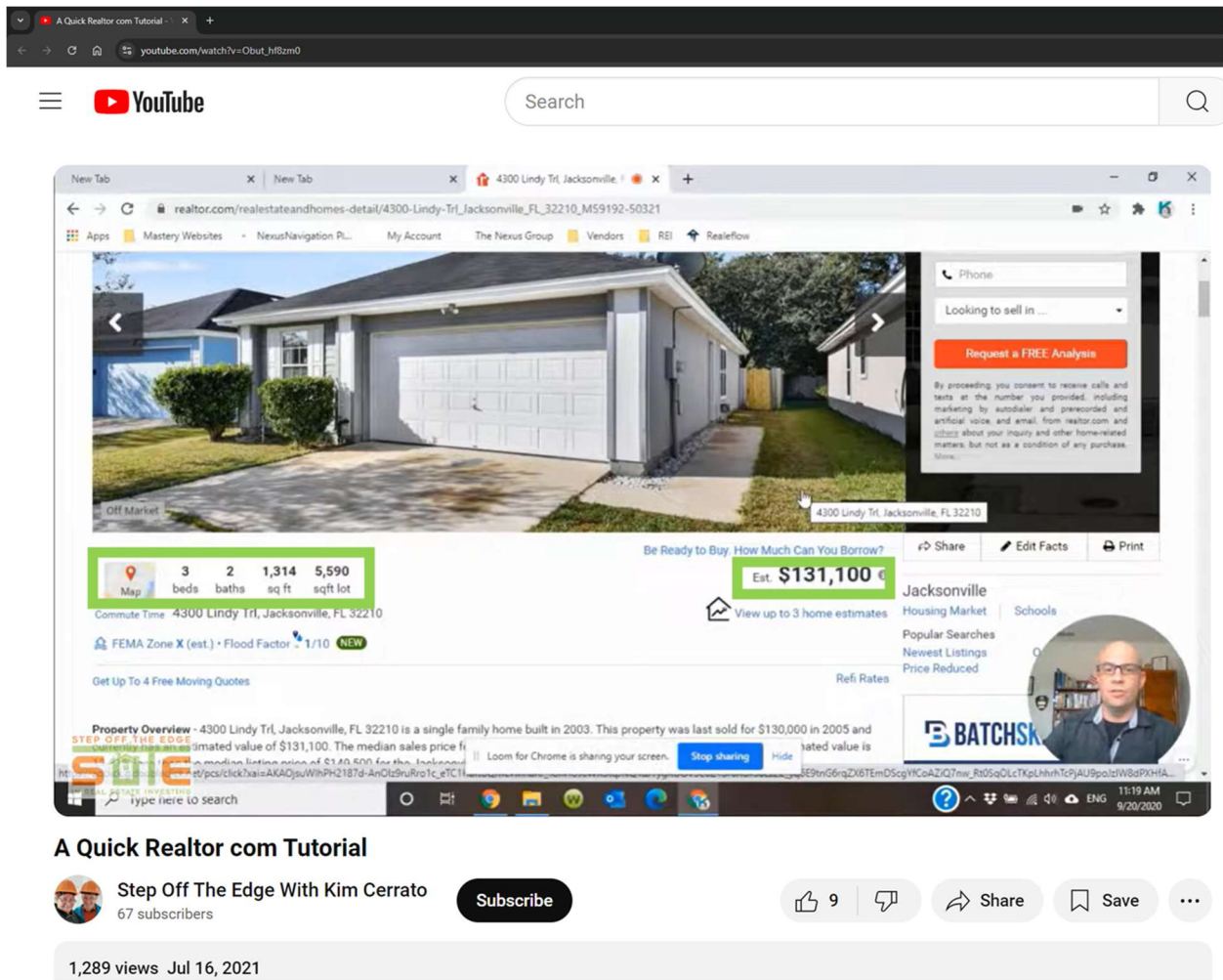


1,289 views Jul 16, 2021

(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).

48. The Accused Instrumentality electronically retrieves a plurality of electronic media submissions from an electronic media submissions database on a non-transitory medium, for example multimedia content pertaining to posting a real estate listing on the Accused Instrumentality. Individual user-submitters can sign up and maintain a number of real estate listings, which are stored on a user database. Such user database is stored in memory available through the Accused Instrumentality, for example as discussed above. User attributes selected by users pertaining to the real estate listings, contained on the user database, may include *e.g.*, Listing price, number of beds and bathrooms, square feet, geographical location and the like, as shown for

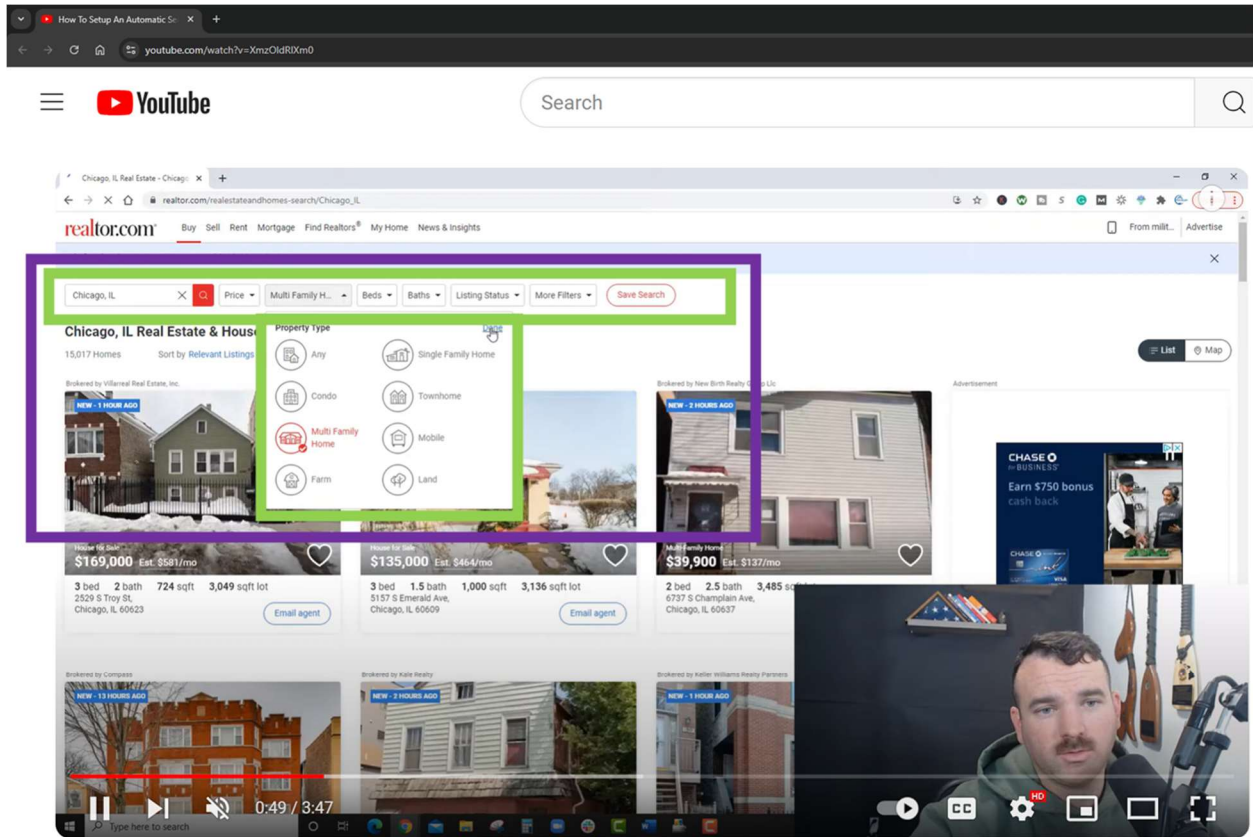
example in the examples below. The Accused Instrumentality’s retrieval of electronic media with associated photo content and textual content associated with the real estate listing from the electronic media submissions database uses an electronic content filter located on the one or more data processing apparatus. As can be seen below, such electronic content filter as is used by CoStar is based at least in part on at least one of the one or more user attributes selected by the user (e.g., Listing price, number of beds and bathrooms, square feet, geographical location, property type, listing status and the like), which in turn affect which electronic media submissions, and associated media, appear to the user, as shown and discussed for example below.



(E.g., https://www.youtube.com/watch?v=Obut_hf8zm0).

The screenshot displays a YouTube video player. The video content shows a browser window with the Realtor.com website. The website's main heading reads "Let's find a home that's perfect for you." Below this, there is a search bar with the placeholder text "Address, School, City, Zip or Neighborhood" and a red "Search" button. The search bar is highlighted with a purple rectangular box. Above the search bar, navigation links for "BUY", "RENT", "PRE-APPROVAL", "JUST SOLD", and "HOME VALUE" are visible. Below the search bar, there is a section titled "New Listings in Springfield, MO" with three property cards. Each card shows a house image, a price, and a "NEW" badge with a timestamp (e.g., "NEW - 28 HOURS AGO"). The first card has a price of \$254,900, the second \$324,900, and the third \$230,000. The video player interface includes the YouTube logo, a search bar, and video controls. The video title is "How To Setup An Automatic Search on Realtor.com" by David Pere, who has 40.5K subscribers. The video has 24 likes and was viewed 1,952 times on Feb 27, 2021.

(E.g., <https://www.youtube.com/watch?v=XmzOldRIXm0>).



How To Setup An Automatic Search on Realtor.com



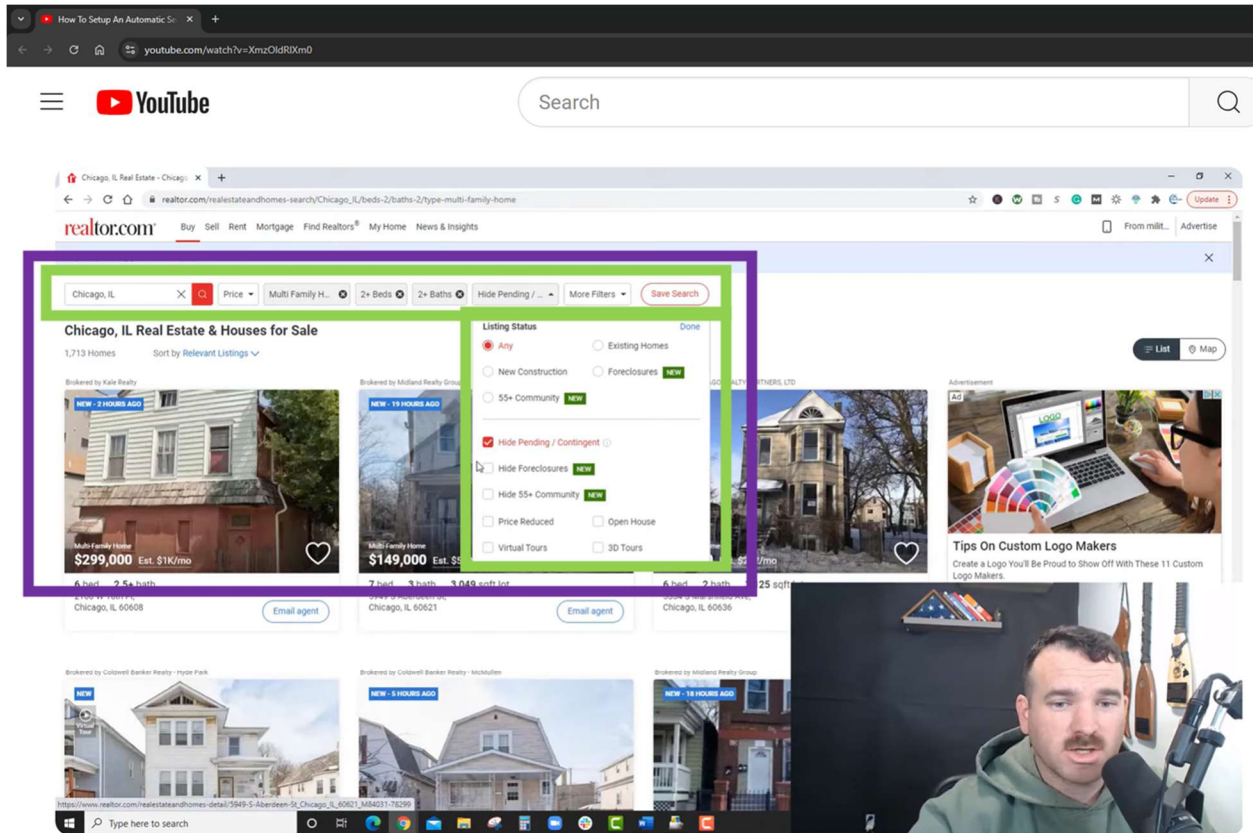
David Pere
40.5K subscribers

Subscribe

24 Likes Comments Share Save ...

1,952 views Feb 27, 2021

(E.g., <https://www.youtube.com/watch?v=XmzOldRIXm0>).



How To Setup An Automatic Search on Realtor.com



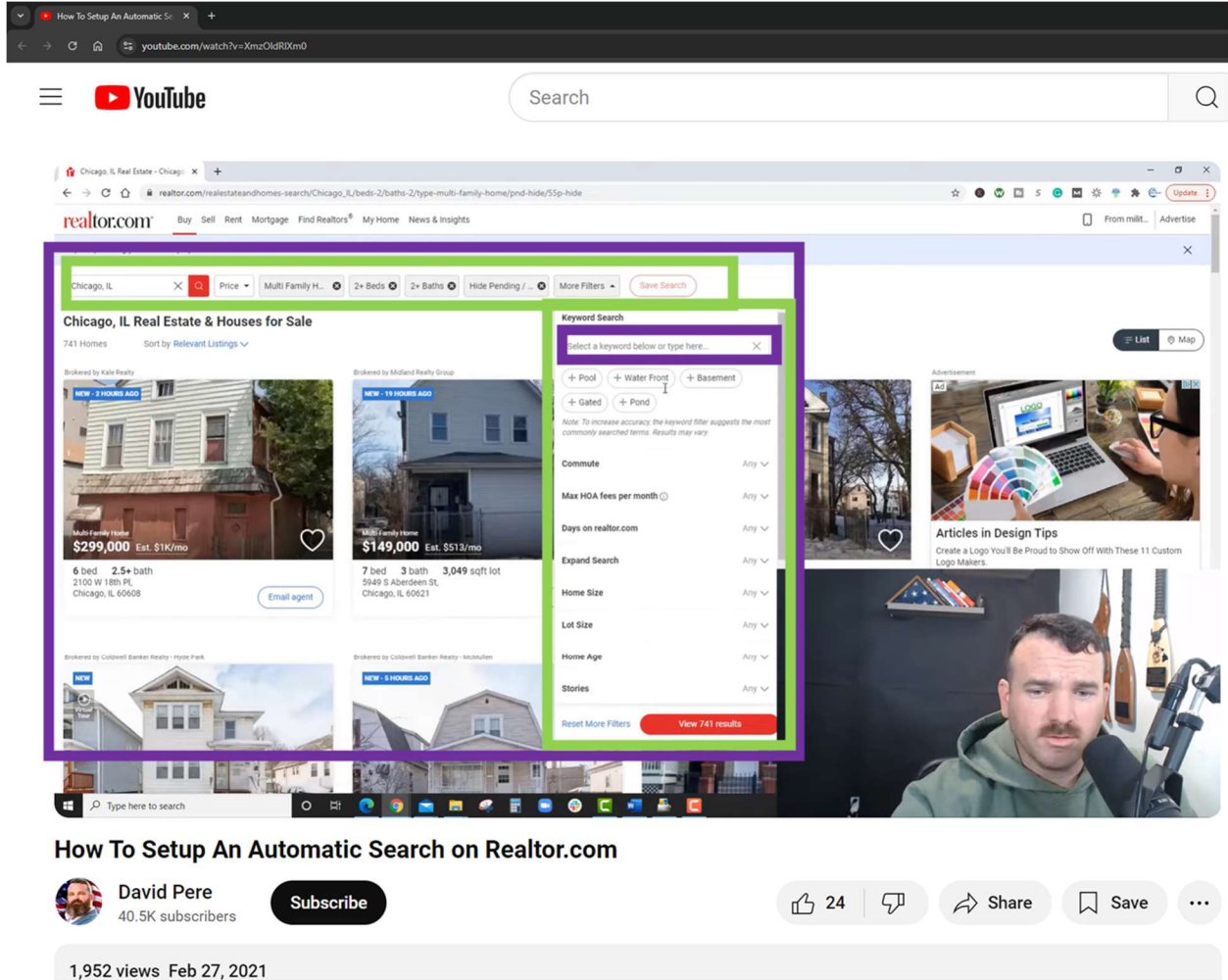
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24 Share Save ...

1,952 views Feb 27, 2021

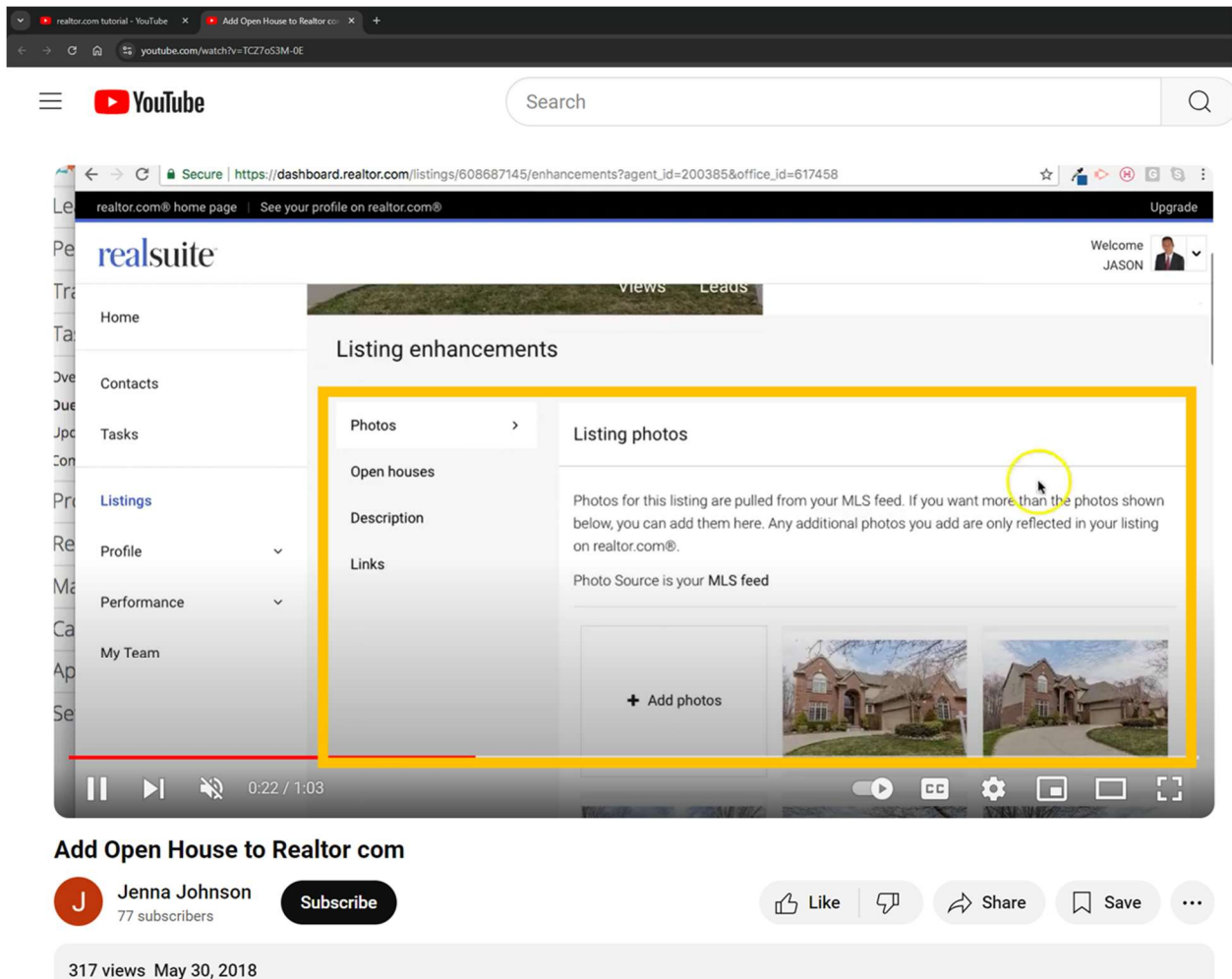
(E.g., <https://www.youtube.com/watch?v=XmzOldRIXm0>).



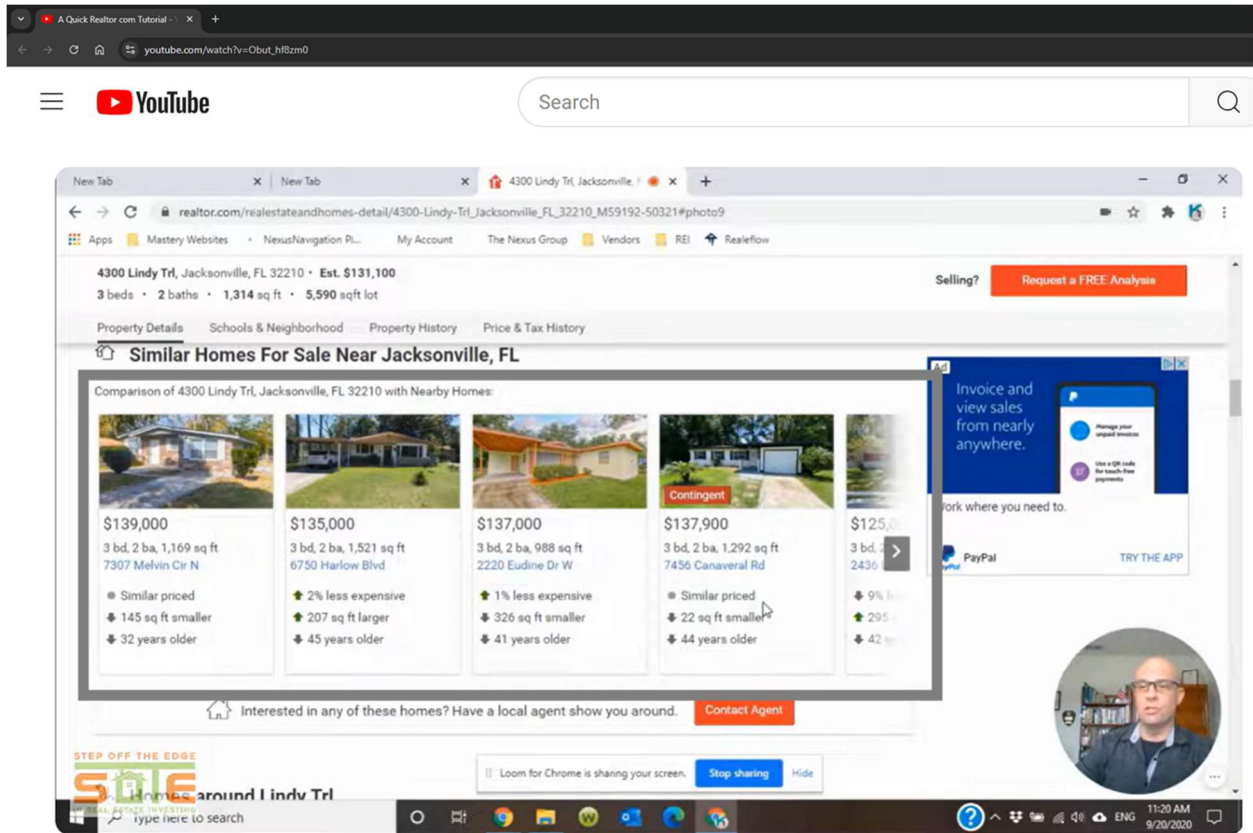
(E.g., <https://www.youtube.com/watch?v=XmzOldRIXm0>).

49. The Accused Instrumentality includes an electronic media submissions server subsystem, having one or more data processing apparatus and an electronic media submissions database stored on a non-transitory medium in order to process and store received submissions from a plurality of user-submitters, for example content pertaining to their respective electronic media submission (e.g., real estate listing) on the Accused Instrumentality, as well as multimedia content (e.g., photo and/or textual content) to be displayed on a main page or within a real estate listing, as discussed and shown for example in connection with the above discussion. Individual

users may create a profile and submit content pertaining to their user profile and/or Real estate listing. The submissions are provided to the Accused Instrumentality via a submissions electronic interface, e.g., a web-based content portal such as CoStar’s RealSuite dashboard for real estate agents, accessible for example by logging in and selecting an option to upload such content or import content, configured to receive such electronic media, from a plurality of submitters (e.g., real estate agents) over a public network (e.g., the Internet) and stored, via an uploading process, in said electronic media Listings database for use in distribution to other users of the Accused Instrumentality.

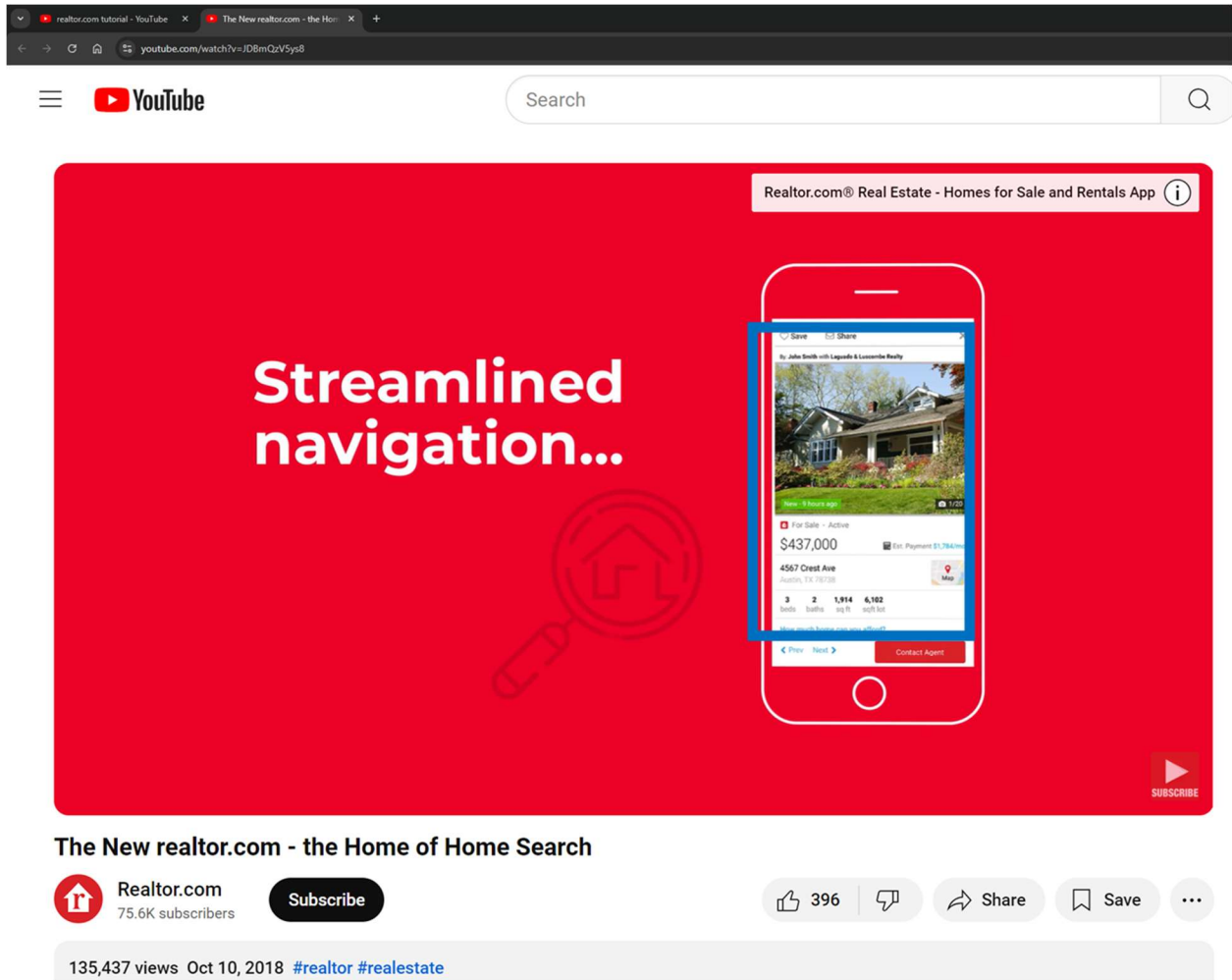


(E.g., <https://www.youtube.com/watch?v=TCZ7oS3M-0E>).



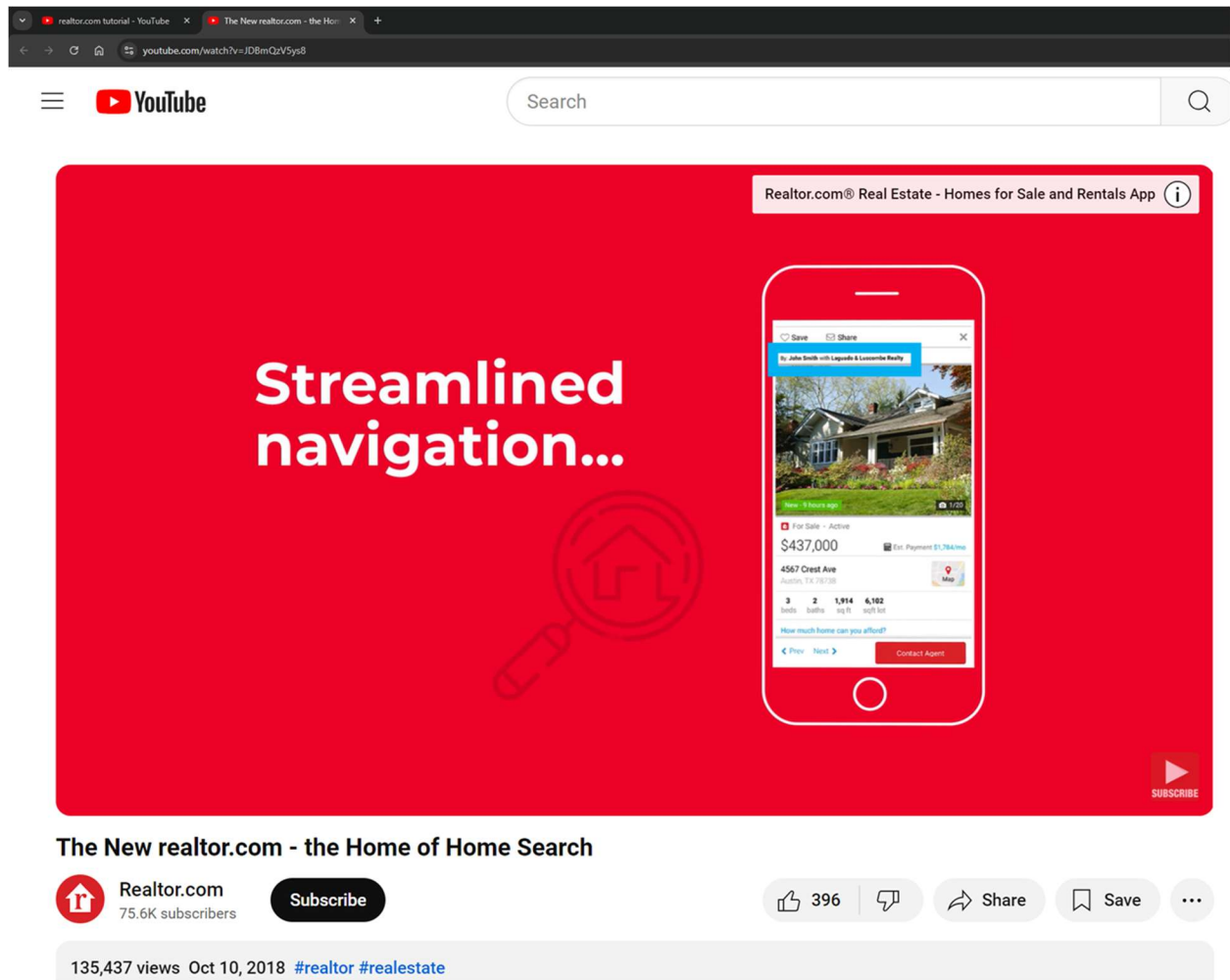
(E.g., https://www.youtube.com/watch?v=Obut_hf8zm0).

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



(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).

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



(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).

52. The Accused Instrumentality employs an electronic release subsystem operatively coupled to the electronic multimedia creator server subsystem, necessarily having one or more data processing apparatus to serve real estate listings with associated photo, and textual content to users, configured to make the multimedia content electronically available for viewing on one or more user devices. CoStar uses function-specific subsystems, for example as discussed below.

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youtube.com/watch?v=JDBmQzV5ys8

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(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).

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YouTube Search

More about this property
Your Name
Email
Phone
I'm interested in 4567 Crest Ave
Get pre-approved by a lender.
Contact Agent

\$437,000 Est. Payment \$1,784/mo
4567 Crest Ave, Austin, TX 78738
3 beds 2 baths 1,914 sq ft 6,102 sqft lot

Property Type: Single Family Home **Stop on Realtor.com** 7 hours
Price per sqft: \$225 Style: Two Entry Year Built: 1989 Status: Active

Ask a question Share

Open Houses

Next \$499K 3 bd

Immediately see when the home was added

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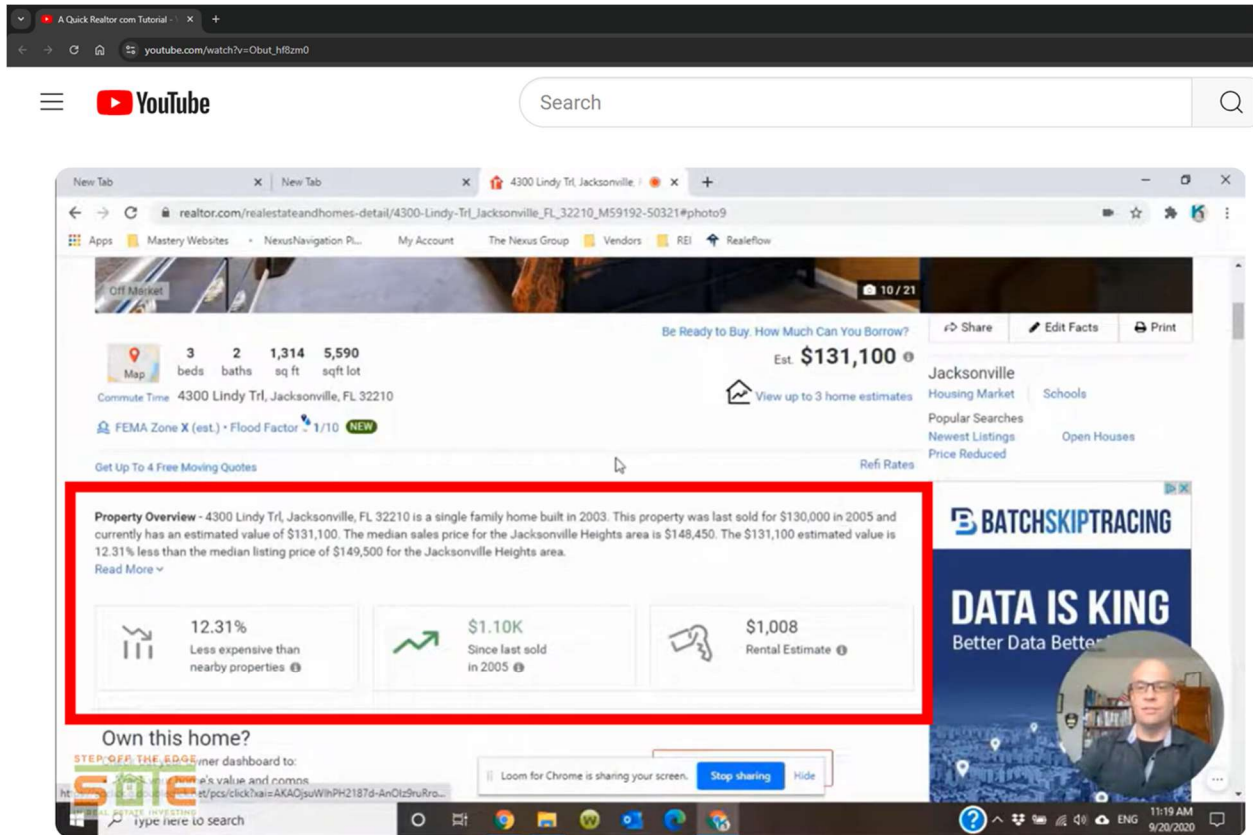
The New realtor.com - the Home of Home Search

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(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).



(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).

53. The Accused Instrumentality employs an electronic voting subsystem, necessarily having one or more data processing apparatus in order to track voting or electronic rating, configured to enable a user to electronically vote for or rate an electronically available multimedia content (e.g., a real estate listing), e.g., by the user's choices with respect to a selection of a Heart button. CoStar uses function-specific subsystems, for example as discussed below.

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youtube.com/watch?v=JDBmQzV5ys8

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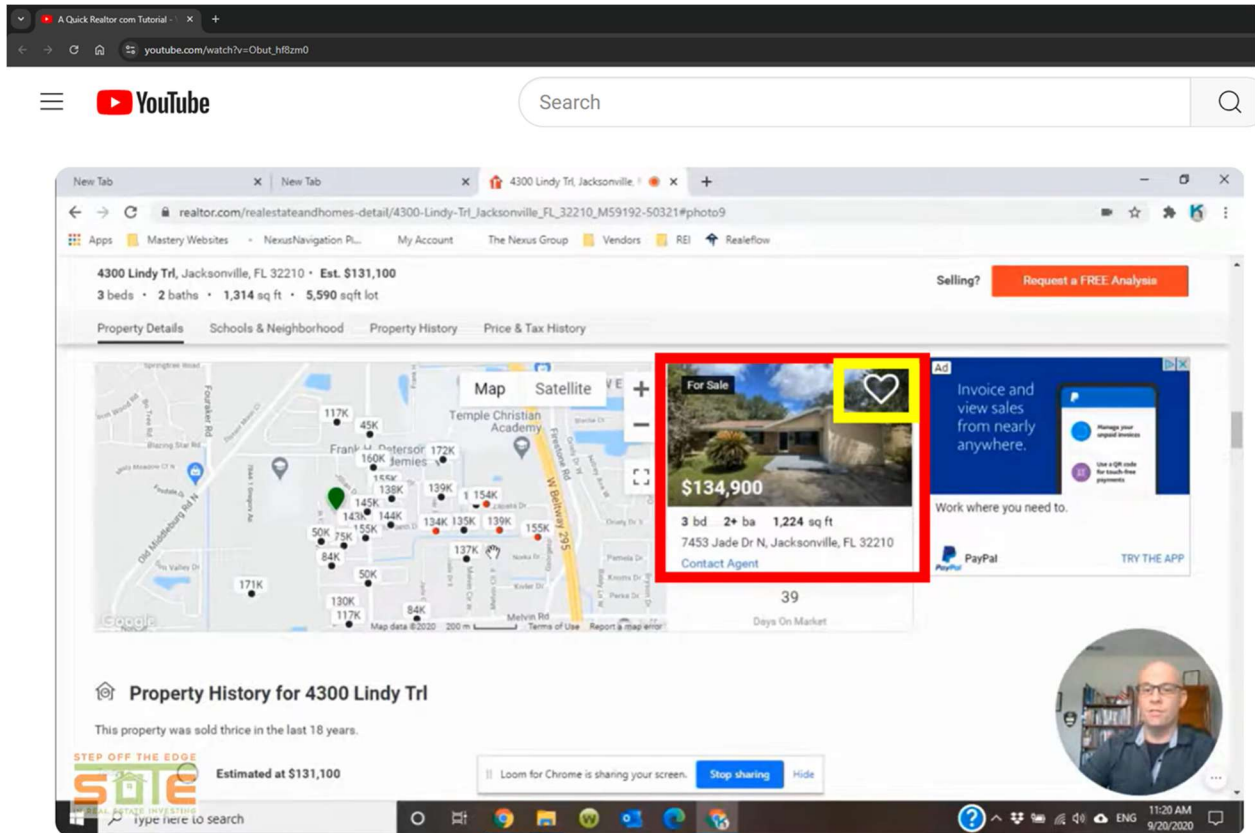
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(E.g., <https://www.youtube.com/watch?v=JDBmQzV5ys8>).



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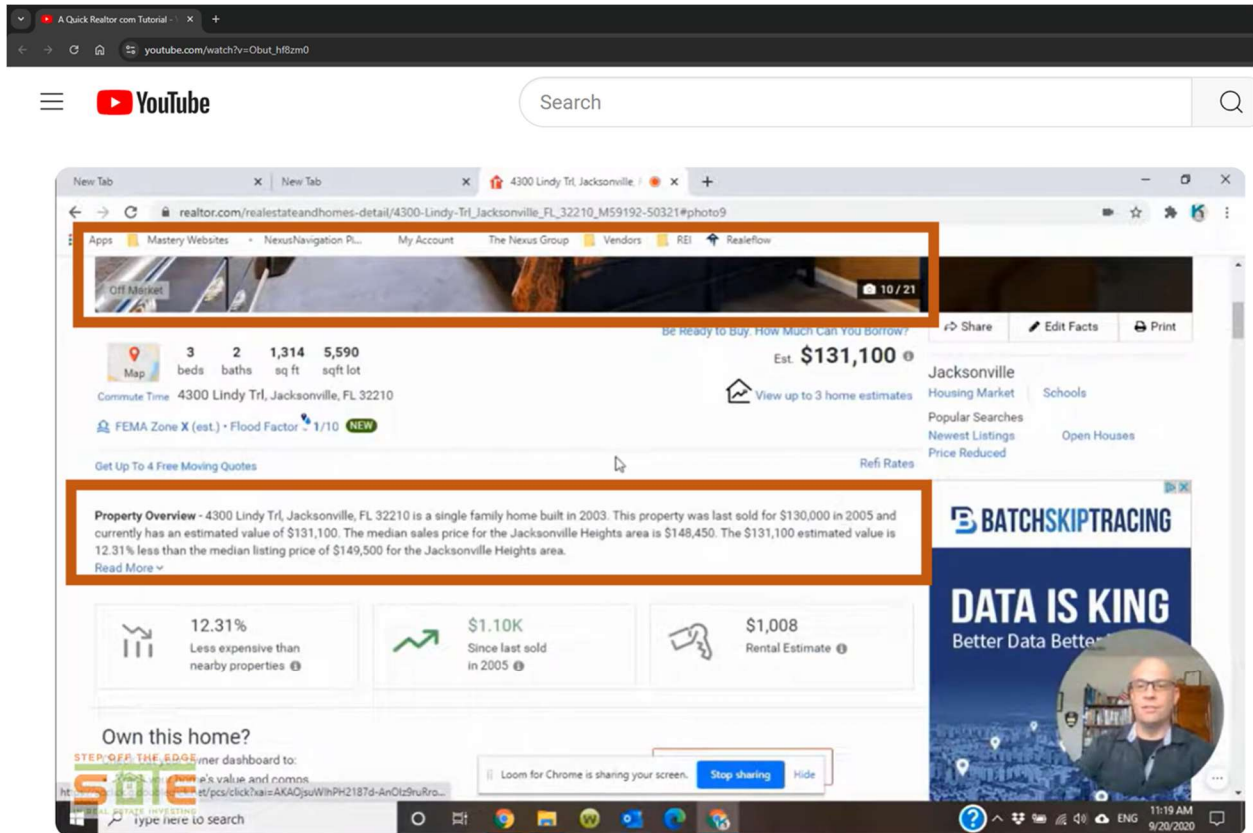
Share

Save

1,289 views Jul 16, 2021

(E.g., https://www.youtube.com/watch?v=Obut_hf8zm0).

54. The Accused Instrumentality enables the electronic media submission to include both image and text associated with the submission. As can be shown below, the images pertain to photographs of the real estate listing and text may include an address or a description associated with the real estate listing as inputted by the user-submitter.



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67 subscribers

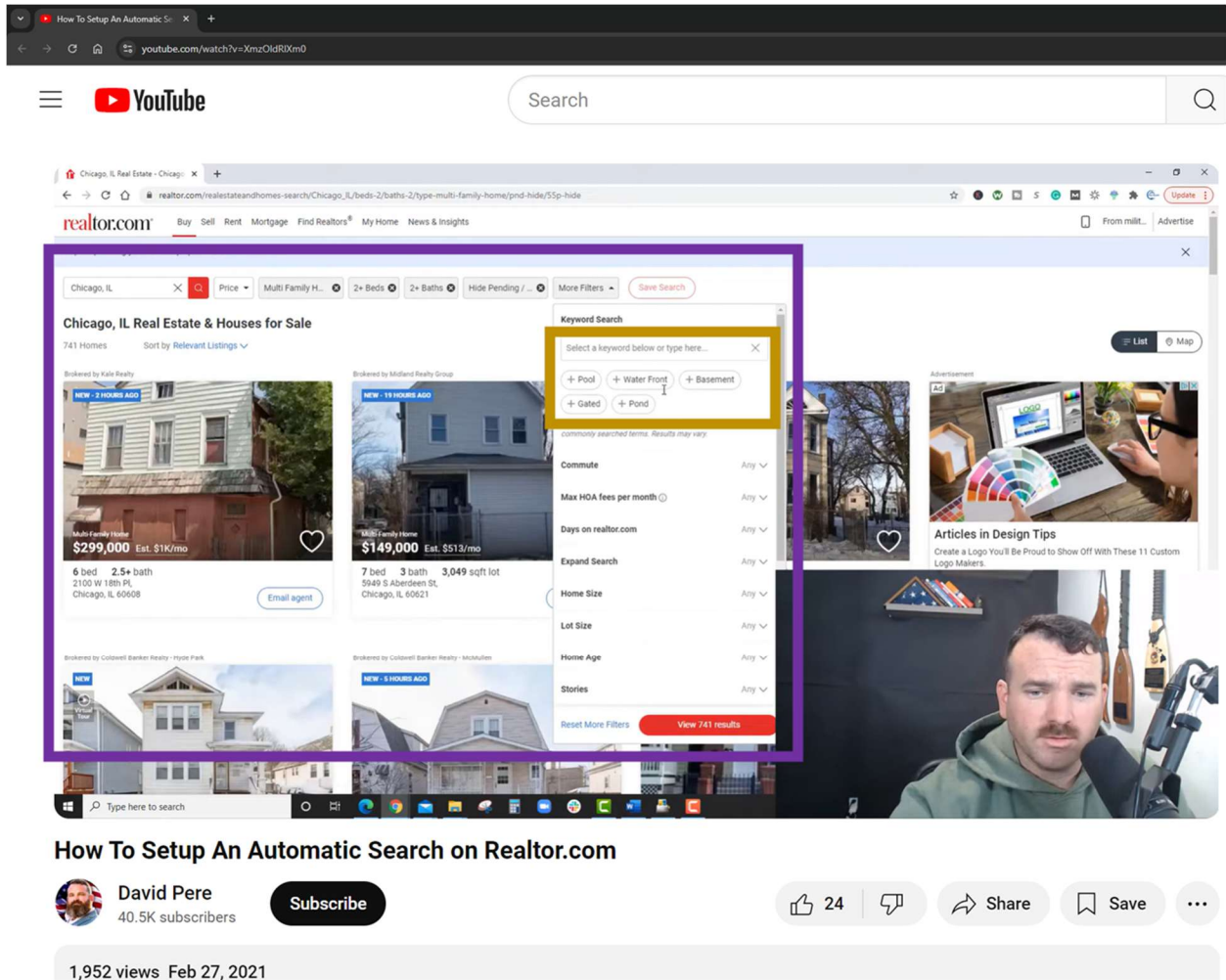
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(E.g., https://www.youtube.com/watch?v=Obut_hf8zm0).

55. The Accused Instrumentality enables the electronic content filter to include criteria defined by keywords. As can be shown below, the user is able to conduct a text search outside of predetermined criteria. The text search represents user-inputted keywords which necessarily narrows the search to media submissions' text.



(E.g., <https://www.youtube.com/watch?v=XmzOldRIXm0>).

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

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

V. JURY DEMAND

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

VI. PRAYER FOR RELIEF

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

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

February 3, 2025

/s/ Cecil E. Key

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