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9 Attorneys for Plaintiff, Pragmatius AV, LLC

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12
13 PRAGMATIUS AV, LLC,

14 Plaintiff,

15 vs.

16 FACEBOOK, INC., et al.,

17 Defendants.

No.: C11-00494-SI

**PLAINTIFF'S DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS TO
PHOTOBUCKET.COM, INC.**

Honorable Judge Susan Illston

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19 Pursuant to Patent Local Rule 3-1, Plaintiff Pragmatius AV, LLC ("Plaintiff" or "Pragmatius"),
20 sets forth the following infringement contentions as to Photobucket.com, Inc. ("Infringement
21 Contentions") with respect to the patents-in-suit, U.S. Patent Numbers 7,831,663 (the "663 patent");
22 7,822,813 (the "813 patent"); and 7,730,132 (the "132 patent").

23 **PRELIMINARY STATEMENT**

24 Plaintiff's investigation of the matters disclosed herein is ongoing. Discovery has not begun,
25 and Photobucket has not produced any documents or other information that may provide further
26 factual bases for Plaintiff's claims of infringement, including any technical documentation and
27 source code of the accused systems and methods and its communications with its advertisers,
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1 partners, licensees or end-users. The following disclosures, therefore, are based upon public
2 information available to Plaintiff after a reasonable investigation. Plaintiff also states that the
3 subject matter of this disclosure may relate to, at least in part, information regarding, constituting or
4 included in communications between Photobucket (as well as any related companies) and its (or
5 their) advertisers, partners, licensees or end-users regarding product designs, features and
6 functionalities and/or partnering or other software or hardware license agreements to which
7 Photobucket is a party and which are under the control or within the possession of third-parties. This
8 disclosure may, therefore, be preliminary or incomplete, and Plaintiff expressly reserves the right to
9 amend and supplement its disclosure, consistent with Pat. L.R. 3-6, if additional information is
10 discovered from these third parties or Photobucket, or if the claims of the '663, '813 and '132 patents
11 are construed by this Court in a manner not proposed by Plaintiff, or for other timely showing of
12 good cause.

13 **3-1. Disclosure of Asserted Claims and Infringement Contentions.**

14 (a) *Each claim of each patent in suit that is allegedly infringed by each opposing party,*
15 *including for each claim the applicable statutory subsections of 35 U.S.C. §271 asserted;*

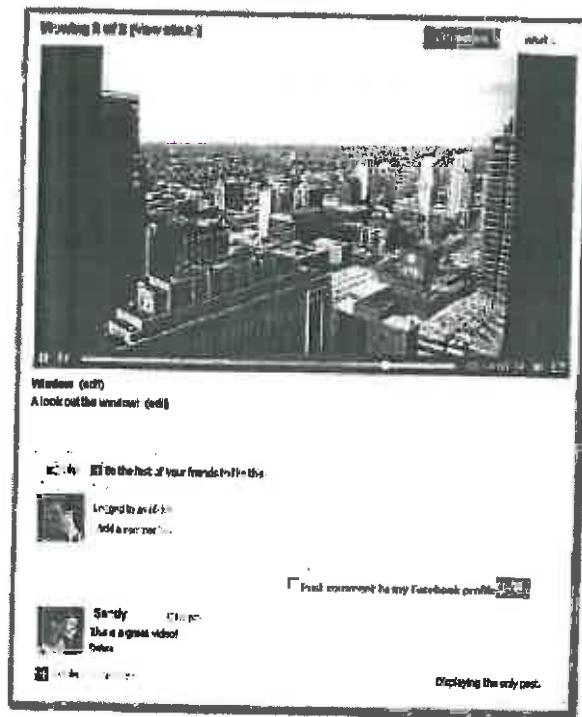
16 Subject to the limitations in the Preliminary Statement, Plaintiff contends that Photobucket
17 has directly infringed and continues directly to infringe claims 1-5, and 8-20 of the '663 patent;
18 claims 1-7, 9, 11-17, and 19-20 of the '813 patent; and claims 1-17 of the '132 patent within the
19 meaning of 35 U.S.C. § 271(a).

20 (b) *Separately for each asserted claim, each accused apparatus, product, device,*
21 *process, method, act, or other instrumentality ("Accused Instrumentality") of each opposing party of*
22 *which the party is aware. This identification shall be as specific as possible. Each product, device,*
23 *and apparatus shall be identified by name or model number, if known. Each method or process*
24 *shall be identified by name, if known, or by any product, device, or apparatus which, when used,*
25 *allegedly results in the practice of the claimed method or process;*

26 Subject to the limitations in the Preliminary Statement, Plaintiff contends that the Accused
27 Instrumentalities with respect to Photobucket include, without limitation, at least the following:
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1 1. With regard to the asserted claims of the '663 patent, the Accused Instrumentalities
2 are:

3 (i) For claims 1-5, and 8-13 of the '663 patent, the Accused Instrumentalities are
4 Photobucket's networked storage systems configured to store universally formatted multimedia
5 documents comprising component media uploaded and added by users over the internet. The
6 Accused Instrumentalities include, for example, the networked storage systems that provide the
7 representation of the multimedia document at least part of which is shown by the partial screenshot
8 below.



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21 As far as Plaintiff is aware, Photobucket's networked storage systems do not have a name or
22 model number.

23 (ii) For claims 14-20 of the '663 patent, the Accused Instrumentalities are
24 Photobucket's methods of configuring its networked storage systems to allow users to store
25 component media such as videos that comprise multimedia documents, and add to and access
26 multimedia documents over the internet. The Accused Instrumentalities include, for example, the
27 methods that provide the representation of the multimedia document at least part of which is shown
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1 by the partial screenshot above. As far as Plaintiff is aware, these methods do not have a name or
 2 model number.

3 2. With regard to the asserted claims of the '813 patent, the Accused Instrumentalities
 4 are:

5 (i) For claims 1-7, and 9 of the '813 patent, the Accused Instrumentalities are
 6 Photobucket's content storage systems configured for storing universally formatted multimedia
 7 documents comprising component media uploaded by users over the internet, where users can
 8 access, add to, and play back components of the document using start, stop and pause. The Accused
 9 Instrumentalities include, for example, Photobucket's content storage systems that provide the
 10 representation of the multimedia document at least part of which is shown by the partial screenshot
 11 above and below.



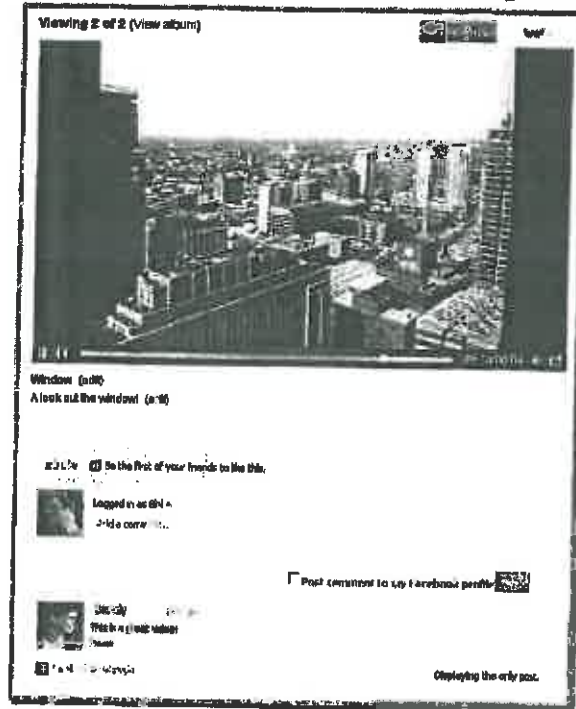
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 21 As far as Plaintiff is aware, Photobucket's content storage systems do not have a name or
 22 model number.

23 (ii) For claims 11-17, and 19-20 of the '813 patent, the Accused Instrumentalities
 24 are audio-video storage subsystems configured for storing universally formatted multimedia
 25 documents comprising component media uploaded by users over the internet, where users can add
 26 to the document and tag a portion of the document to allow the tags to be searched. The Accused
 27 Instrumentalities include, for example, Photobucket's audio-video storage subsystems that provide
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1 the representation of the multimedia document at least part of which is shown by the partial
2 screenshot above and below. As far as Plaintiff is aware, Photobucket's audio-video storage
3 subsystems do not have a name or model number.

4 3. With regard to the asserted claims of the '132 patent, the Accused Instrumentalities
5 are:

6 (i) For claims 1-9 of the '132 patent, the Accused Instrumentalities are
7 Photobucket's multimedia storage server with a network interface that allow users to upload and
8 store component media that comprise multimedia documents that are displayed with spatial layout
9 and order of presentation, including video component media, as well as allowing editing, including
10 annotating, component media and simultaneously providing access to decompressed video
11 component media and its associated annotations over the internet using IP protocol. The Accused
12 Instrumentalities include, for example, the multimedia storage servers that provide the representation
13 of the multimedia document at least part of which is shown by the partial screenshot below.



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26 As far as Plaintiff is aware, Photobucket's multimedia storage servers do not have a name or
27 model number.
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1 (ii) For claims 10-17 of the '132 patent, the Accused Instrumentalities are
2 Photobucket's methods of configuring its multimedia storage servers to provide simultaneous access
3 to multimedia documents comprising component media laid out and ordered for the users, and
4 allowing editing including annotating the multimedia document as well as playback of component
5 decompressed video media over the internet using IP protocol. The Accused Instrumentalities
6 include, for example, Photobucket's methods of configuring its multimedia storage servers to
7 provide the representation of the multimedia document at least part of which is shown by the partial
8 screenshot above. As far as Plaintiff is aware, these methods do not have a name or model number.

9 (c) *A chart identifying specifically where each limitation of each asserted claim is found*
10 *within each Accused Instrumentality, including for each limitation that such party contends is*
11 *governed by 35 U.S.C. § 112(6), the identity of the structure(s), act(s), or material(s) in the Accused*
12 *Instrumentality that performs the claimed function.*

13 Subject to the limitations in the Preliminary Statement, attached hereto as Exhibit A is a
14 claim chart identifying Photobucket's infringement of the '663 patent. Plaintiff contends that each
15 Accused Instrumentality of Photobucket literally infringes each asserted claim of the '663 patent.

16 Subject to the limitations in the Preliminary Statement, attached hereto as Exhibit B is a
17 claim chart identifying Photobucket's infringement of the '813 patent. Plaintiff contends that each
18 Accused Instrumentality of Photobucket literally infringes each asserted claim of the '813 patent.

19 Subject to the limitations in the Preliminary Statement, attached hereto as Exhibit C is a
20 claim chart identifying Photobucket's infringement of the '132 patent. Plaintiff contends that each
21 Accused Instrumentality of Photobucket literally infringes each asserted claim of the '132 patent.

22 (d) *For each claim which is alleged to have been indirectly infringed, an identification of*
23 *any direct infringement and a description of the acts of the alleged indirect infringer that contribute*
24 *to or are inducing that direct infringement. Insofar as alleged direct infringement is based on joint*
25 *acts of multiple parties, the role of each such party in the direct infringement must be described.*

26 Subject to the limitations in the Preliminary Statement, Plaintiff contends that Photobucket
27 has directly infringed the '663, '813 and '132 patents and expressly reserves its right to amend this
28 disclosure to present contentions regarding Photobucket's indirect infringement, if appropriate.

1 (e) Whether each limitation of each asserted claim is alleged to be literally present or
2 present under the doctrine of equivalents in the Accused Instrumentality.

3 Subject to the limitations in the Preliminary Statement, Plaintiff contends that Photobucket
4 has infringed the '663, '813 and '132 patents literally and expressly reserves its right to present
5 Photobucket's infringement under the Doctrine of Equivalents following the Court's claim
6 construction of any disputed claim term or element if such claim construction warrants further
7 elaboration of its contentions under the Doctrine of Equivalents.

8 If the Court's claim construction results in one or more of the claimed elements of any
9 asserted claims not being literally present in the Accused Instrumentalities, Plaintiff also reserves its
10 right to present its additional contention that any distinction or differences between the resultant
11 construed claims and the steps taken using the Accused Instrumentalities is an insubstantial and
12 immaterial difference that does not preclude liability for infringing the '663, '813 and '132 patents
13 by Photobucket on the basis of a Wilson Sporting Goods Hypothetical Claim analysis. In other
14 words, Plaintiff may present an analysis that the owner of the '663, '813 and '132 patents could have
15 obtained from the United States Patent Office a hypothetical claim that omits any additional
16 limitation or requirement claimed to be missing literally from the accused products, services,
17 technologies and/or methods as a result of the Court's claim construction. The fact that a
18 hypothetical patent claim, sufficient in scope to cover these Accused Instrumentalities literally (or
19 any use of such instrumentalities) would and could have been allowed by the Patent Office will show
20 that any such additional limitation or requirement in the asserted claims of the '663, '813 and '132
21 patents is an insubstantial difference that does not preclude a finding of infringement against
22 Photobucket. See *Wilson Sporting Goods Co. v. David Geoffrey & Assoc.*, 904 F.2d 677 (Fed. Cir.
23 1990).

24 Plaintiff also may rely upon the opinions of one or more experts in support of its
25 infringement contentions under the Doctrine of Equivalents in the manner set forth by the Court's
26 Scheduling Order and Patent Local Rules. Plaintiff will disclose these opinions and the support for
27 them in accordance with the Federal Rules of Civil Procedure and the procedures, schedules and
28 deadlines ordered by the Court.

1 (f) *For any patent that claims priority to an earlier application, the priority date to*
2 *which each asserted claim allegedly is entitled.*

3 Subject to the limitations in the Preliminary Statement, the '663, '813 and '132 patents all
4 claim priority, directly or indirectly under 35 U.S.C. § 120 and/or § 121, to U.S. Application
5 08/131,523 filed on October 1, 1993. Thus, subject to the above limitations and reservations,
6 Plaintiff will rely on the October 1, 1993 filing date as its date of priority, as reflected on the face
7 page of the '663, '813 and '132 patents.

8 (g) *If a party claiming patent infringement wishes to preserve the right to rely, for any*
9 *purpose, on the assertion that its own apparatus, product, device, process, method, act, or other*
10 *instrumentality practices the claimed invention, the party shall identify, separately for each asserted*
11 *claim, each such apparatus, product, device, process, method, act, or other instrumentality that*
12 *incorporates or reflects that particular claim.*

13 Subject to the limitations in the Preliminary Statement, Plaintiff states that the subject matter
14 of this disclosure may relate to information regarding product design and development that is wholly
15 or largely under the control or within the possession of third parties such as Avistar, Inc. and Vicor,
16 Inc. which are not currently affiliated with Plaintiff, and over which Plaintiff has no control. In
17 addition, one of the third parties may no longer be an active or independent business. Therefore, this
18 disclosure by Plaintiff may well be preliminary or incomplete, and it expressly reserves the right to
19 modify and supplement its disclosure if additional information is discovered.

20 Subject to these limitations, Plaintiff states that it does not believe it owns any apparatus,
21 product, device, process, method, act, or other instrumentality that practices one or more of the
22 claimed inventions of the '663, '813 and '132 patents.


23 (h) *If a party claiming patent infringement alleges willful infringement, the basis for such*
24 *allegation.*

25 Subject to the limitations in the Preliminary Statement, Plaintiff reserves the right to amend
26 this disclosure to present contentions regarding Photobucket's willful infringement, if appropriate.
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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2011, the foregoing Plaintiff's Disclosure of Asserted Claims and Infringement Contentions to Photobucket.com, Inc. was sent via overnight mail to the following:

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and was sent via first class mail, postage prepaid, to the following:

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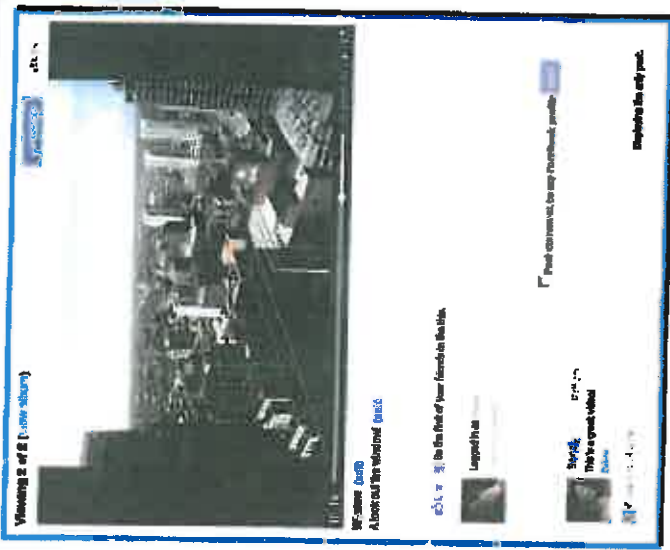
EXHIBIT A

**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket¹ with Respect to
 EXHIBIT A
 US Patent No. 7,831,663**


US 7,831,663	Photobucket Products
<p>1. A networked storage system comprising:</p>	<p>The networked Photobucket servers on which one or more of the multimedia documents and components (e.g. video, annotations, comments, tags, hyperlinks, graphics, still images, slideshows, timestamps, etc.) are stored.</p>
<p>a first storage device configured to store at least a first and second multimedia document,</p>	<p>Photobucket multimedia documents are stored as components on Photobucket servers. A Photobucket user sees representations of multimedia documents on their respective client devices, made up of components. One such representation is shown in the screenshot below. Here, a video component is linked to this multimedia document using HTML code. It also includes components such as a photo identifying a user (see top left), various forms of text, a "box" for entering comments, as well as other images.</p> <p>Note that a "second" multimedia document would have the same format but different content.</p> <p>When a user accesses the Photobucket multimedia documents that contain video and comments, the URL is a Photobucket URL, indicating storage within the Photobucket servers or servers under the control of, or affiliated with, Photobucket.</p>

¹ For purposes of Plaintiff's infringement contentions with respect to this and all other asserted claims, "Photobucket Products" including these expressly identified Accused Instrumentalities (including their various versions and releases) as well as other Photobucket products, systems, servers, services, technologies and methods (regardless of their labels, names or identifiers) made, used, sold, offered for sale, or otherwise distributed in the United States on or after November 9, 2010 that have at least the same or substantially the same functionalities or features of the expressly identified Accused Instrumentalities.

**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
 EXHIBIT A cont.
 US Patent No. 7,831,663**

<p>US 7,831,663</p>	<p align="center">Photobucket Products</p>  <p align="center">Note that a "second" multimedia document would have the same format but different content.</p>
<p>both multimedia documents having a universal format that defines the multimedia document as a collection of media components and with a structure that captures the relationship among the</p>	<p>Photobucket multimedia documents have a universal format that defines how they look to a user. The spatial layout and structural relationship between the different components, such as video, user identifying icons, text, boxes, etc of the multimedia document are shown in the screen shot below. The arrangement of these component media compose the multimedia document.</p> <p>HTML defines the spatial layout of the multimedia document that users view on the webpages. The HTML code and referenced CSS files define the structure of the document including the position and</p>

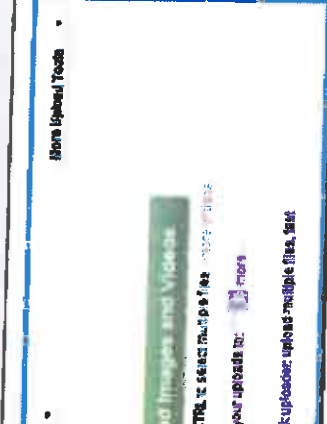
Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>
<p>components including spatial layout, and</p>	<p>layout of the text, graphics, colors, font, etc.</p> 
<p>configured to provide access to the first and second multimedia documents to respective users of first and second client devices, the first client device being in</p>	<p>Photobucket users connect to the Photobucket storage servers through their respective client devices over the wide area network, the internet. Once connected, Photobucket allows them to access, or view, the various multimedia documents. The screenshot above shows a rendition of a multimedia document that maybe displayed to a user.</p>

**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
EXHIBIT A cont.
US Patent No. 7,831,663**

US 7,831,663	Photobucket Products
<p>communication with the first storage device, and being separated from the first storage device by a wide area network, and</p>	<p>Note that a "second" multimedia document would have the same format but different content.</p>
<p>the second client device being in communication with the first storage device, the second client device being separated from the first client device and the first storage device by a wide area network,</p>	<p>Photobucket users' client devices are physically separated from one another but are in communication with the Photobucket storage servers over the wide area network, the internet.</p>
<p>wherein the networked storage system is configured to:</p>	<p>Photobucket server(s).</p>
<p>enable respective users of the first and second client devices to cause storage of the first and second multimedia documents, respectively, at the first storage device,</p> <p>the first and second multimedia documents each including at least a reference to a video portion and at least a hyperlink referencing at least one other multimedia document;</p>	<p>The Photobucket servers allow users to upload and store different media components (video, picture, etc) on the Photobucket storage servers. The screenshot below shows how media such as video is uploaded by users for storage by Photobucket.</p>

Plaintiff Pragmatas AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

US 7,831,663	Photobucket Products
<p>Upload to: <input type="text" value="Bible"/> <input type="button" value="More Upload Tools"/></p>  <p>The screenshot shows a green button labeled "Upload Images and Videos". Below it, text reads: "To upload, click CTRL + S to select multiple files. View help More". Below that, it says "Start your uploads to:" followed by a folder icon and "More". At the bottom, it says "Use our bulk uploader: uploads multiple files. Get".</p> <p>Once stored, component media is used to compose multimedia documents. One such rendition is shown below.</p>	

Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663




<p>US 7,831,663</p>	<p>Photobucket Products</p>  <p>The screenshot shows a video player interface. At the top, it says "Viewing a video (4:00:00)". The video itself shows a cityscape with a prominent tower. Below the video, there are social media sharing options and a "Log in or Sign up" button. The URL in the address bar is http://photobucket.com/videos/cool/%20cars/%20videos/.</p>
	<p>Note that a "second" multimedia document would have the same format but different content. As shown, this multimedia document has a reference to video. The video is shown in the center of the page. The multimedia document also has numerous hyperlinks. One hyperlink, "Cool Cars Videos" is shown in the screenshot below, which has an underlying URL of http://photobucket.com/videos/cool/%20cars/%20videos/ as indicated by the "Properties" tab.</p>


EXHIBIT A cont.
Plaintiff Pragmatas AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
US Patent No. 7,831,663

<p align="center">US 7,831,663</p>	<p align="center">Photobucket Products</p> <div data-bbox="406 577 844 1123" data-label="Image"> </div> <p>Clicking on the link takes a user to "one other" multimedia document. See "Cool Cars Videos Videos" circled.</p>
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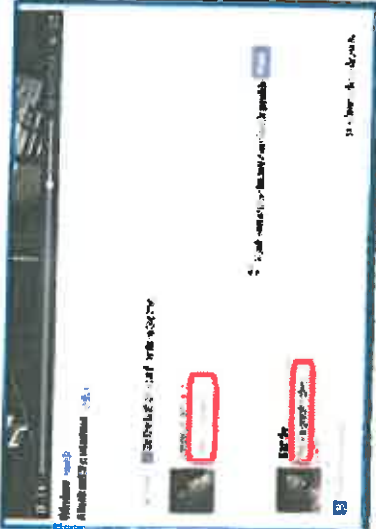
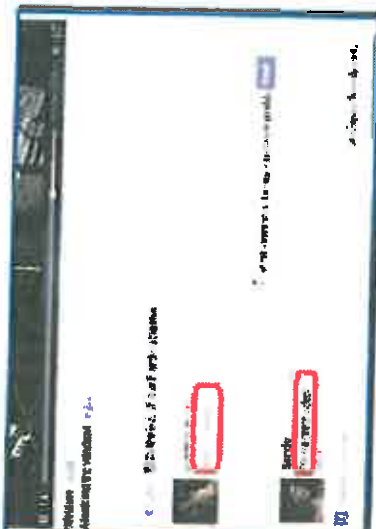
Plaintiff Pragmatas AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>	
<p>Examples also include access to content from advertisers/sponsors, as shown in the screen shot below.</p> 		


Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p align="center">Photobucket Products</p> <p>Clicking on the "Toyota Corolla" ad above links a user to http://www.toyota.com/corolla/ as shown below.</p> 
<p>enable respective users of the first and second client devices to each add content to the first and second multimedia documents by using the respective first and second client devices; and</p>	<p>Photobucket servers allow users to each add to the various multimedia documents at their own client devices, using their web browsers. Users can add to multimedia documents in many ways including adding comments, hyperlinks, or tags and using the "Like" rating feature.</p>

Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p align="center">Photobucket Products</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p>This screenshot above shows added content in the form of tags and comments. Note that a "second" multimedia document would have the same format but different content.</p> <hr style="border-top: 1px dashed black;"/> <p>enable the users of the first and second client devices to each access and view the first and second multimedia documents to which content has been added.</p> <p>Photobucket users can access and view various multimedia documents to which content has been added. This screenshot shows a video with added comments that can be accessed and viewed by other users.</p>
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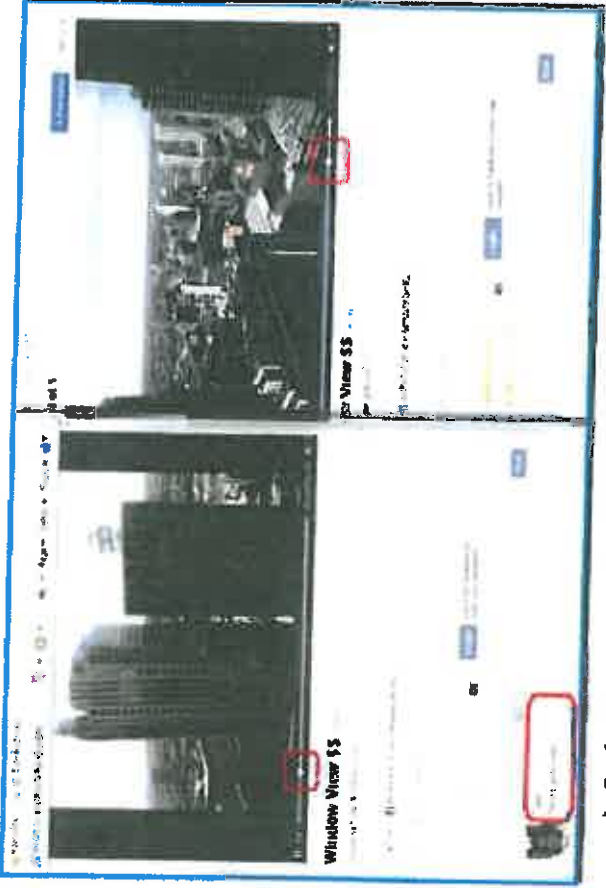
Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
EXHIBIT A cont.
 US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>	<p>This screenshot shows tags and comments circled. Note that a "second" multimedia document would have the same format but different content.</p>
<p>2. The networked storage system of Claim 1, further configured to enable playback of media associated with at least one of the first and second multimedia documents at the first and second client devices, and to enable operations on the played back media using at least one operation from a group consisting of start, stop, and pause-operations.</p>	<p>The Photobucket servers are configured to enable playback of media, including video, associated with multimedia documents stored on Photobucket. Specifically, the Photobucket servers cause the video to be displayed in the user's browser. Users can manipulate the video playback using the operations of start, stop and pause.</p>  <p>This screenshot shows a video in playback mode. The video progress bar can be manipulated by the user to start and pause the video. The pause button to the left of the time bar may also be used, and when paused, the pause button becomes a play (start) button. Stopping the video can be accomplished for example, by navigating away from the video using the browser's "back" button or choosing another video to view.</p>	<p></p>
<p>3. The networked storage system of Claim 1, wherein the respective users of the first and second devices are further enabled to:</p> <p>(i) access the first and second multimedia documents stored at the first storage device;</p>	<p>Photobucket allows different users to access, or view, different multimedia documents stored on the Photobucket storage servers. Specifically, the Photobucket servers cause the video to be displayed in the users' browser. After accessing a multimedia document, users may playback media, such as video, associated with the multimedia documents. Photobucket allows users to operate the video playback using start, stop and pause.</p>	<p></p>

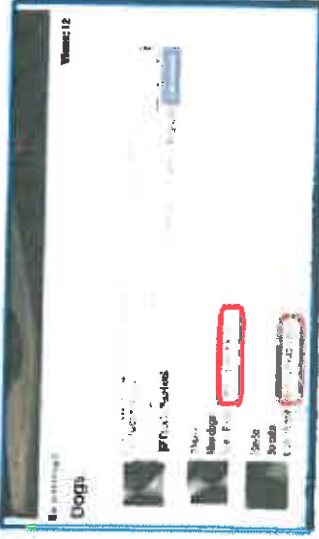
**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
 EXHIBIT A cont.
 US Patent No. 7,831,663**

<p>US 7,831,663</p>	<p align="center">Photobucket Products</p>
<p>(ii) playback media associated with at least one of the first and second multimedia documents accessed from the first storage device; and</p> <p>(iii) operate on the played back media using at least one operation from a group consisting of start, stop, and pause operations.</p>	<div data-bbox="406 577 1063 1123" data-label="Image"> </div> <p>The above screenshot shows a rendition of a multimedia document accessed by the user, with component video media. Note that a "second" multimedia document would have the same format but different content.</p> <div data-bbox="1144 420 1307 1302" data-label="Image"> </div> <p>This screenshot shows a video in playback. A user can manipulate the video progress bar and the button to the left of the bar to play and pause the video as it plays. The pause button on the left may also be used.</p>



Plaintiff Pragmatns AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p align="center">Photobucket Products</p> <p>When paused, the pause button becomes a play (start) button. Stopping the video can be accomplished for example, by navigating away from the video using the browser's "back" button or choosing another video to view.</p>
<p>4. The networked storage system of Claim 1, further configured to:</p> <ul style="list-style-type: none"> (i) enable simultaneous multiple access at the first and second devices to a plurality of multimedia documents stored at the first storage device; and (ii) cause multiple playbacks of media associated with the plurality of multimedia documents accessed from the first storage device. 	<p>The Photobucket servers enable users, through their respective client devices to simultaneously access a variety of multimedia documents stored on the Photobucket servers. The users can then playback media associated with the multimedia documents. Users can also play a video multiple times. This screenshot shows two users playing back the same multimedia file simultaneously.</p>  <p>Simultaneous access is further demonstrated by the fact that both users <i>Blake</i> and <i>Marie</i> added comments</p>

**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
 EXHIBIT A cont.
 US Patent No. 7,831,663**

<p>US 7,831,663</p>	<p align="center">Photobucket Products</p> <p>at the same time (i.e. "about a minute ago").</p>  <p>The example above shows simultaneous access to a single multimedia document. In addition, it is self evident that multiple users can simultaneously access multiple documents on a single Photobucket server.</p>
<p>5. The networked storage system of Claim 1, wherein the networked storage system is further configured to enable at the first and second client device to:</p> <ul style="list-style-type: none"> a) receive a multimedia document from a multimedia resource over the wide area network; and b) playback of media associated with the received multimedia document. 	<p>The Photobucket system is configured to allow users to receive, access and view media from various types of multimedia resources. Access is via client devices over a wide area network, the internet. Examples include access to content from advertisers/sponsors, as shown in the screen shot below.</p>

Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>
 <p>Clicking on the "Toyota Corolla" ad above takes a user to http://www.toyota.com/corolla/ that is not stored on a Photobucket server.</p> 	

Plaintiff Pragmatas AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

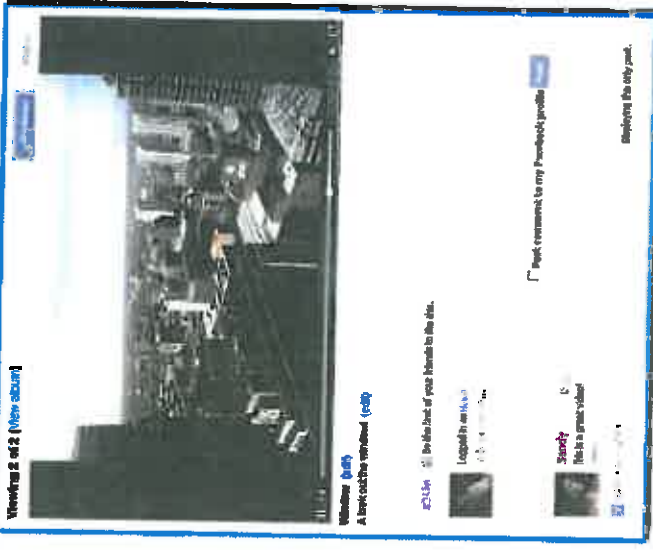
<p>US 7,831,663</p>	<p>Photobucket Products</p>
<p>8. The networked storage system of Claim 1, wherein the first and second multimedia documents further includes one or more pointers to corresponding multimedia documents in a plurality of file systems.</p>	<p>The Photobucket system comprises storage facilities in communication with the wide area network, the internet. The Photobucket system stores components of multimedia documents on these storage facilities including pointers in the HTML code.</p> <p>To produce a multimedia document requires pointers in the HTML code to the storage where these component images, videos, files, etc. reside.</p>  <p>Note that a "second" multimedia document would have the same format but different content.</p>

EXHIBIT A cont.
Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
US Patent No. 7,831,663

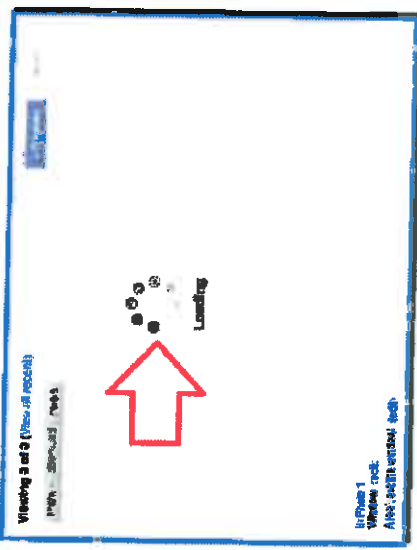
<p>US 7,831,663</p>	<p align="center">Photobucket Products</p>
<p>9. The networked storage system of Claim 1, further configured to cause buffering of a flow of data associated with a respective multimedia document accessed from the first storage device.</p>	<p>The Photobucket storage system is configured to cause buffering of data associated with a multimedia document in order to display it to the user, when the respective user accesses the video.</p> <p>This screenshot shows a video "buffering." The word "loading," coupled with the spinning wheel as highlighted by the arrow, shows the user that the file is being buffered.</p>  <p>The screenshot shows a video player interface. At the top, it says 'Viewing 3 of 9 (View all results)'. Below that, there are search filters: 'PHOTOBUCKET' and 'PVA'. In the center, there is a large red arrow pointing to a 'Loading' indicator, which consists of a spinning wheel and the word 'Loading' below it. At the bottom, there is a copyright notice: '© 2008 Photobucket, Inc. All rights reserved. http://www.photobucket.com'.</p>
<p>10. The networked storage of Claim 1, wherein at least one multimedia document stored at the first storage device includes time-sensitive media and time-insensitive media, and wherein the multimedia document includes at least three different media.</p>	<p>The Photobucket servers store both time sensitive media such as videos and time insensitive media such as still graphics and text. This screenshot shows a representation of a multimedia document with at least three different kinds of media: video, still graphics and text.</p>

EXHIBIT A cont.
Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
US Patent No. 7,831,663


<p>US 7,831,663</p>	<p>Photobucket Products</p>
<p>11. The networked storage system of Claim 1, wherein at least one of the multimedia documents referenced by a hyperlink is stored in a second storage device.</p>	 <p>The screenshot shows a web browser window displaying a user profile on Photobucket. At the top, there is a video player with a play button and a video title. Below the video, there are navigation links such as 'Home', 'About this network', 'Logout', and 'Sign out'. A 'Feedback' link is also visible. The page layout includes a header area, a main content area with the video, and a sidebar with additional links and information.</p>
<p>The networked storage system comprises storage facilities in communication with the wide area network, the internet. The Photobucket system's multimedia documents include associated hyperlinks. For example, some of the media components include hyperlinks that take a user, accessing this multimedia document, to other multimedia documents, other functions, other user's profile pages, etc.</p>	<p>The Photobucket system comprises storage facilities in communication with the wide area network, the internet. The Photobucket system's multimedia documents include associated hyperlinks. For example, some of the media components include hyperlinks that take a user, accessing this multimedia document, to other multimedia documents, other functions, other user's profile pages, etc.</p>

EXHIBIT A cont.
Plaintiff Pragmatus AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
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<p align="center">US 7,831,663</p>	<p align="center">Photobucket Products</p>
<div data-bbox="406 577 1047 1123" data-label="Image"> </div> <p data-bbox="1047 231 1169 1480"> The screenshot below illustrates, for one hyperlink on a multimedia document, "Cool Cars Videos" is shown in the screenshot below, which has an underlying URL of http://photobucket.com/videos/cool%20cars%20videos/ as indicated by the "Properties" tab. </p>	

Plaintiff Pragmatus AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

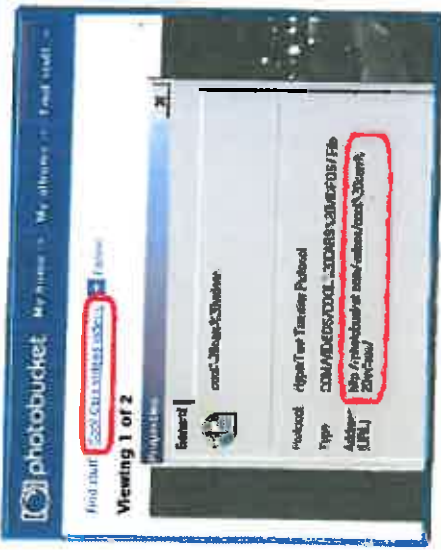


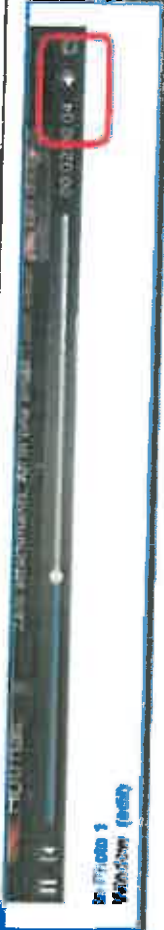
<p>US 7,831,663</p>	<p>Photobucket Products</p>
<div style="display: flex; justify-content: space-around;">   </div> <p>The Photobucket system is also configured to allow users to access and view media from various third party storage devices. These are referenced by a hyperlink. Examples include access to content from advertisers/sponsors, as shown in the screen shot below.</p>	

EXHIBIT A cont.
Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>	<p>Clicking on the "Toyota Corolla" ad above takes a user to http://www.toyota.com/corolla/ as shown below.</p>
<p>12. The networked storage system of Claim 1, further configured to enable the first storage device to transfer multimedia documents to a second storage device in the networked storage system.</p>	<p>Standard industry practice for a major data center would require transfer for redundancy and backup replication.</p>	
<p>13. The networked storage system of Claim 1, wherein the third multimedia document referenced by the at least one hyperlink includes audio.</p>	<p>As explained above, for instance in Claim 11, multimedia documents that contain video can be accessed by hyperlink. The video also includes audio. The screenshot below shows a multimedia document in playback mode. The audio (volume) control is circled.</p>	

<p>US 7,831,663</p>	<p align="center">Photobucket Products</p> 
<p>14. A method comprising:</p> <p>enabling storing, by respective users of first and second client devices of at least first and second multimedia documents at a first storage device in a networked storage system,</p>	<p>The method of providing access occurring on the Photobucket servers on which one or more of the multimedia documents and components (e.g. video, annotations, comments, tags, hyperlinks, graphics, still images, slideshows, timestamps, etc.) are stored.</p> <p>Photobucket multimedia documents are stored as components on Photobucket servers. A Photobucket user sees representations of multimedia documents on their respective client devices, made up of components. One such representation is shown in the screenshot below. Here, a video component is linked to this multimedia document using HTML code. It also includes components such as a photo identifying a user (see bottom left), various forms of text, a "box" for entering comments, as well as other images.</p>

Plaintiff Pragmatus AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663



<p>US 7,831,663</p>	<p>Photobucket Products</p>
<p>each of the first and second multimedia documents having a universal format that defines the multimedia document as a collection of media components and with a structure that captures the relationship among the</p>	 <p>Note that a "second"¹⁹ multimedia document would have the same format but different content.</p>
<p>Photobucket multimedia documents have a universal format that defines how they look to a user. The component media are arranged in the multimedia document for the user. The spatial layout and structural relationship between the different components, such as video, user identifying icons, text, boxes, etc of the multimedia document are shown in the screen shot below.</p> <p>HTML defines the spatial layout of the multimedia document that users view on the webpages. The HTML code and referenced CSS files define the structure of the document including the position and</p>	<p>each of the first and second multimedia documents having a universal format that defines how they look to a user. The component media are arranged in the multimedia document for the user. The spatial layout and structural relationship between the different components, such as video, user identifying icons, text, boxes, etc of the multimedia document are shown in the screen shot below.</p> <p>HTML defines the spatial layout of the multimedia document that users view on the webpages. The HTML code and referenced CSS files define the structure of the document including the position and</p>

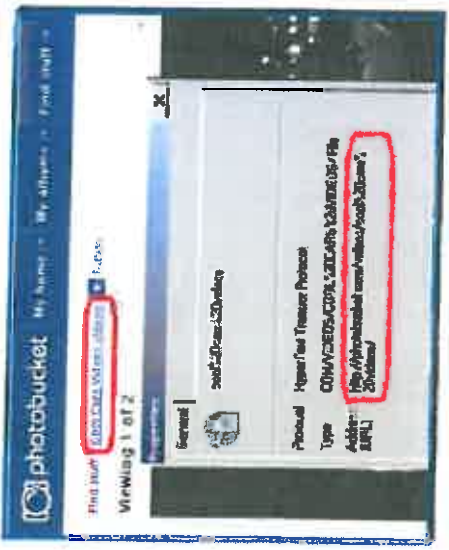
EXHIBIT A cont.
Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
US Patent No. 7,831,663

<p>US 7,831,663</p> <p>components including spatial layout; and</p>	<p>Photobucket Products</p>
<p>enabling respective users of the first and second client devices that are in communication with the first storage device over a</p>	<p>layout of the text, graphics, colors, font, etc.</p> <div data-bbox="500 583 1166 1129" data-label="Image"> <p>The image is a screenshot of a web browser displaying a Photobucket photo gallery. The main content area shows a grid of several small thumbnail images. Below the grid, there are navigation and control elements including a 'Viewing 2 of 2 (New album)' indicator, a 'View more (0/2)' link, and a '4,143 comments' count. There are also social media sharing icons for Facebook and Twitter. The overall layout is clean and organized, typical of a web-based photo gallery interface.</p> </div> <p>Note that a "second" multimedia document would have the same format but different content.</p>
<p>respective client devices over a wide area network, users can access, or view, multimedia documents including ones with video component media. When a user accesses a Photobucket multimedia document that contains video and comments, the URL is a Photobucket URL, indicating storage within the Photobucket servers or servers</p>	<p>Photobucket servers are in communication with users' respective client devices over a wide area network, the internet. Over this network, users can access, or view, multimedia documents including ones with video component media. When a user accesses a Photobucket multimedia document that contains video and comments, the URL is a Photobucket URL, indicating storage within the Photobucket servers or servers</p>


**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
 EXHIBIT A cont.
 US Patent No. 7,831,663**

<p>US 7,831,663</p>	<p>Photobucket Products</p>
<p>wide area network to each access both the first and second multimedia documents stored at the first storage device, the first and second multimedia documents each including at least a reference to a video portion and at least a hyperlink referencing at least one other multimedia document;</p>	<p>under the control of, or affiliated with, Photobucket.</p> <p>Photobucket multimedia documents include references to video and also have hyperlinks referencing other multimedia documents. This screenshot shows a multimedia document with a video reference.</p>  <p>Note that a "second" multimedia document would have the same format but different content.</p> <p>In the screenshot below, one hyperlink on a multimedia document is shown. The multimedia document also has numerous hyperlinks. One hyperlink, "Cool Cars Videos" is shown in the screenshot below, which has an underlying URL of http://photobucket.com/videos/cool%20cars%20videos/ as indicated by the "Properties" tab.</p>



Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>  <p>Clicking on the link takes a user to "one other" multimedia document. See "Cool Cars Videos Videos" circled.</p>
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Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>
 <p>The Photobucket system is also configured to allow users to access and view media from various third party storage devices. Examples also include access to content from advertisers/sponsors, as shown in the screen shot below. These are referenced using hyperlinks.</p>	

Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>  <p>Clicking on the "Toyota Corolla" ad above takes a user to http://www.toyota.com/corolla/ as shown below.</p> 
<p>enabling respective users of the first and second client devices to</p>	<p>Photobucket servers allow users to communicate with the Photobucket storage servers through their</p>


**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
 EXHIBIT A cont.
 US Patent No. 7,831,663**

US 7,831,663	Photobucket Products
<p>communicate with the first storage device, the first and second client devices being separated from each other and the first storage device by a wide area network;</p>	<p>respective client devices over a wide area network, the internet. Multiple Photobucket users are physically separated from one another and the Photobucket servers, but still connected to Photobucket over the internet.</p>
<p>enabling respective users of the first and second client devices to add content to the first and second multimedia documents by using the first and second client devices; and</p>	<p>Photobucket allows users to each add to the various multimedia documents from their own client devices, using their browsers for example. These additions can come in many forms including adding annotations, comments or tags to the multimedia document as shown below. After this content is added, it becomes part of the multimedia document.</p>



Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>
<p>enabling respective users of the first and second client devices to access and view the first and second multimedia documents to which content has been added.</p>	<div data-bbox="406 577 1071 1123" data-label="Image"> <p>The screenshot shows a web page for a multimedia document. At the top, there is a video player with a play button and a 'View share' link. Below the video, there are social interaction buttons: 'Like', 'Like this item', 'Like this item', and 'Like this item'. There is also a 'Study' button and a 'Post comment to any Facebook profile' button. The page is titled 'Viewing 2 of 2 (New share)'.</p> </div> <p>This screenshot shows a multimedia document with added comments and tags. Note that a "second" multimedia document would have the same format but different content.</p>
<p>enabling respective users of the first and second client devices to access and view the first and second multimedia documents to which content has been added.</p>	<p>Photobucket users are able to view the multimedia documents to which video, comments, tags and annotations have been added.</p> <p>The screenshot below shows what a user would see when accessing a Photobucket multimedia document.</p>

Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p>
<p>15. The method of Claim 14, wherein the at least one other multimedia document referenced by the hyperlink is stored in a second storage device.</p>	<p>This one has video with added comments and tags circled.</p>  <p>Note that a "second" multimedia document would have the same format but different content.</p>
<p>15. The method of Claim 14, wherein the at least one other multimedia document referenced by the hyperlink is stored in a second storage device.</p>	<p>Photobucket is configured to allow users to access and view media from various third party storage devices. These are referenced by hyperlink. Examples include access to content from advertisers/sponsors, as shown in the screen shot below.</p>

Plaintiff Pragmatius AV LLC's P.L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont. US Patent No. 7,831,663

<p>US 7,831,663</p>	<p>Photobucket Products</p> <p>Examples include access to content from advertisers/sponsors, as shown in the screen shot below.</p>  <p>Clicking on the "Toyota Corolla" ad above takes a user to http://www.toyota.com/corolla/ as shown below.</p> 
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**Plaintiff Pragmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
 EXHIBIT A cont.
 US Patent No. 7,831,663**






<p>US 7,831,663</p>	<p align="center">Photobucket Products</p>
<p>16. The method of Claim 14, further comprising enabling transferring of multimedia documents from the first storage device to a second storage device, and wherein at least one multimedia document includes at least three different media.</p>	<p>Standard industry practice for a major data center would require transfer for redundancy and backup replication.</p> <p>The screenshot below shows a multimedia document with three forms of media, video, photos and text.</p>  <p>The screenshot shows a multimedia document interface. At the top, there is a video player with a play button and a progress bar. Below the video player, there is a photo of a cityscape at night. To the right of the photo, there is text that reads: 'A beautiful view of the city at night.' Below the text, there are social media-style interaction buttons: 'Like', 'Comment', and 'Share'. At the bottom of the screenshot, there is a footer that reads: 'Post comment to my Photobucket profile: [button] Delete the entry just.' The entire screenshot is enclosed in a blue border.</p>

EXHIBIT A cont.
Plaintiff Prsgmatius AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to
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US 7,831,663	Photobucket Products
<p>17. The method of Claim 14, wherein the at least one other multimedia document referenced by the hyperlink includes audio.</p>	<p>As explained above, for instance in Claim 15, multimedia documents that contain video can be accessed by hyperlink. The video also includes audio. The screenshot below shows a multimedia document in playback mode. The audio (volume) control is circled in</p>  <p>The screenshot shows a video player window with a volume control slider on the right side, which is circled in red. The window title is 'In F7:35 1 Window'.</p>
<p>18. The method of Claim 14, further comprising enabling the respective users of the first and second client devices to cause playback of media associated with the first multimedia document, and to operate on the play back of the media using at least one operation from a group consisting of start, stop, and pause operations.</p>	<p>The Photobucket servers are configured to enable playback of media, including video, associated with multimedia documents stored on Photobucket. Specifically, the Photobucket servers cause the video to be displayed in the user's browser. Users can manipulate the video playback using the operations of start, stop and pause.</p>  <p>The screenshot shows a video player window with a progress bar and playback controls. The window title is 'In F7:35 1 Window'.</p> <p>This screenshot shows a video in playback mode. The video progress bar can be manipulated by the user to start and pause the video. The pause button to the left of the time bar may also be used, and when paused, the pause button becomes a play (start) button. Stopping the video can be accomplished for example, by navigating away from the video using the browser's "back" button or choosing another video to view.</p>
<p>19. The method of Claim 14, further comprising enabling the respective users of the first and second client devices to:</p>	<p>Photobucket allows different users to access different multimedia documents stored on the Photobucket storage servers. After accessing a multimedia document, users may playback media, such as video, associated with the multimedia documents. Photobucket allows users to operate the video playback using</p>

<p>US 7,831,663</p>	<p>Photobucket Products</p> <p>start, stop and pause.</p> <p>(i) access the first and second multimedia documents stored at the first storage device;</p> <p>(ii) playback media associated with at least one of the first and second multimedia documents accessed from the first storage device; and</p> <p>(iii) operate on the play back of the media using at least one operation from a group consisting of start, stop, and pause operations.</p> <p>The above screenshot shows a multimedia document accessed by the user, with component video media. Note that a "second" multimedia document would have the same format but different content.</p>  <p>This screenshot shows a video in playback. A user can manipulate the video progress bar and the button the left of the bar to play and pause the video as it plays. The pause button on the left may also be used. When paused, the pause button becomes a play (start) button. Stopping the video can be accomplished for example, by navigating away from the video using the browser's "back" button or choosing another video to view.</p>
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<p>US 7,831,663</p>	<p align="center">Photobucket Products</p>
<p>20. The method of Claim 14, further comprising:</p> <ul style="list-style-type: none"> (i) enabling simultaneous multiple access to a plurality of multimedia documents stored at the first storage device; and (ii) causing multiple playbacks of media associated with the plurality of multimedia documents accessed from the first storage device. 	<p>Photobucket allows multiple users, through their respective client devices, to simultaneously access various multimedia documents stored on Photobucket's servers. The users may then playback the associated component media, such as video on the multimedia documents. Users may also access a video multiple times.</p> <p>This screenshot shows two users playing back the same video simultaneously.</p>  <p>Simultaneous access is further demonstrated by the fact that both users <i>Blake</i> and <i>Marie</i> added comments at the same time (i.e. "about a minute ago").</p>

**Plaintiff Pragmatix AV LLC's PLR 3-1 Disclosure of Asserted Claims and Infringement Contentions to Photobucket with Respect to EXHIBIT A cont.
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	 <p>The example above shows simultaneous access to a single multimedia document. In addition, it is self evident that multiple users can simultaneously access multiple documents in a single Photobucket server.</p>