UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SPORTSCASTR INC. (d/b/a PANDA INTERACTIVE),	)	
Plaintiff,	)	
v.	)	Civil Action No. 23cv471
GENIUS SPORTS LTD.,	)	JURY TRIAL DEMANDED
Defendant.	)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SportsCastr Inc. (d/b/a PANDA Interactive) ("Plaintiff" or "PANDA") alleges against Defendant Genius Sports Ltd. ("Defendant" or "Genius Sports") the following:

1. PANDA developed, built and has obtained numerous patents covering, revolutionary Internet technology for the delivery of broadcasts that are enhanced with synchronized, contextually matched, and actionable live data and content. For example, this technology enables viewers to see live odds and to place a bet while watching a sporting event. PANDA's technology is ultra-low latency, push-based and scalable to millions of viewers. It has been widely copied in the streaming market generally, and even more so in the exploding online sports betting market. PANDA's patented technology underpins the sports streaming industry's offerings; but those offerings, including Defendant's offerings are without license or authorization and infringe PANDA's patents.

2. This case involves patented technologies that helped to revolutionize, and have become increasingly adopted in, the fields of live video streaming, also referred to as livestreaming or simply streaming. Live video streaming involves recording and broadcasting an event, such as a sporting event, concert, or product promotion, over the internet in real-time or

near real-time to multiple viewers across the network.

3. In addition to covering an event with video signals, today's live video streaming also attempts to provide viewers with synchronized event information, such as game status of a sporting event or price information of a product promotion.

4. The synchronized event information enabled by the patented technologies may also be actionable. For example, a viewer may click the game status to view or receive more detailed statistics and analysis (such as player and/or game statistics, betting odds, or betting opportunities) or click the price information to place an order of a promoted product. The interactive features of the patented technologies allow the viewer to interact and/or transact, for example, by placing a bet or purchasing a promoted product, while viewing the sporting event without interruption.

5. By the early-to-mid-2010s, as social media and smartphones became widespread, the industry of live video streaming saw exponential growth. By the mid-2010s, many with a smartphone and internet access were able to become content broadcasters via one of the social media platforms, such as YouTube, Facebook Live, and/or TikTok.

6. Despite substantial investments in resources and time, conventional video streaming systems still suffer from several drawbacks that often lead to frustrating user experiences for broadcasters, viewers, or both. One such drawback is the synchronization between contextual-matched event information and the video signals. In many cases, such as with live streaming sports, or sports-betting related content, any noticeable offset (e.g., greater than 1 second) often confuses viewers, and greatly hampers the viewing experience.

7. Relatedly, conventional live video streaming systems also struggle to synchronize the broadcasting among multiple viewers. The offset between different viewers can become

especially significant when they watch videos of different qualities or use network connections having different bandwidths.

8. Plaintiff's patented technologies helped transform the way video streaming is conducted, reducing, and often even eliminating the shortcomings that plagued conventional video streaming systems.

9. More specifically, Plaintiff's patented technologies use a novel socket server architecture that allows actionable and contextual-matched information to be provided in a synchronized and efficient way with online streaming video.

10. Traditional socket server architectures provided one-to-one connections, where a unique identifier was provided to each authenticated user to connect to their own unique socket.

11. Plaintiff's patented technologies, on the other hand, employ a novel socket server architecture, in which a socket is dedicated to a particular live stream to all viewers watching that live stream. For example, Plaintiff's patented technologies allow multiple users to connect to the same event socket, thereby achieving a one-to-many socket architecture. Plaintiff's patented technologies' use of a one-to-many socket architecture was counter to the then-conventional understanding and use of sockets. For example, prior art socket architectures were not designed or used for the delivery of interactive and synchronous content alongside live video streams, let alone multi-cast (or one-to-many) delivery of content over a single unauthenticated socket. Rather, prior art sockets were used in specific and limited applications, such as for chat rooms, delivering update notifications, or other lower data-rate information, where each individual user was connected to a separate socket and given a unique user id. (S*ee,* PANDA_000182-PANDA_000195, https://web.archive.org/web/20160307174809/http://blog.pusher.com/using-your-real-time-data-features/.)

12. In operation, Plaintiff's patented technologies employ a web server to deliver a uniform resource locator (URL), which contains the address of the socket dedicated to a streamed event, to viewers interested in watching the event. Viewers can then use the received URL to connect to the dedicated socket and retrieve synchronized event information from the socket server. The interconnectivity of respective sockets of a socket server to multiple viewer client devices allows for synchronous real-time sharing of event information relating to a live event.

13. Plaintiff's patented technologies also employ separate channels for video content and event information. More specifically, video content is received at a viewer device on a first communication channel (*e.g.*, from a media server), while other video-related information (*e.g.*, game status, price information) are received on a different second communication channel originating at a designated socket of socket server. The different information streams on the separate first and second channels are seamlessly integrated at the viewer device and displayed to the viewer. In this manner, contextual-matched and actionable information is synchronized with livestreaming video. The delivery of video and video-related information over separate channels allows for unmodified video to be delivered, which is an important improvement over prior art systems which required contextual information to be embedded in the video stream itself, increasing processing delays and requiring special license and media rights held by only a few individuals.

14. Plaintiff has implemented its patented technologies in its video-streaming products including a video-based social network targeting consumers (SportsCastr) and a B2B software solution designed for major enterprises, sports media, affiliates, and betting operators (PANDA Studio). It was one of the first companies to receive an investment and licensing deal from the NFL Players Association (NFLPA) and was an officially licensed NFLPA platform.

15. Over the years, Plaintiff has also received numerous accolades and awards for its products and services, including winning Sports Tech Tokyo and being named a finalist in the Yahoo! Sports Tech Awards and Sports Business Journal's Best in Sport's Tech in 2019. Its technology and platform have been featured in dozens of mainstream and trade publications and TV broadcasts including CNBC, Yahoo!, CNet, Sports Business Journal, Forbes and many more.

16. Plaintiff currently owns numerous patents and pending patent applications describing and claiming these technologies and other innovations, including U.S. Patent Nos. 10,805,687 ("the '687 Patent"), 11,039,218 ("the '218 Patent"), and 10,425,697 ("the '697 Patent").

17. Defendant Genius Sports is a direct competitor of Plaintiff and provides video streaming software and systems that, without authorization, implements Plaintiff's patented technologies. Genius Sports provides a suite of infringing video-streaming products that (1) facilitate providing live streams of sporting events to end users and (2) integrate with broadcasters' streams and sportsbooks' platforms alike (e.g., LiveData, LiveTrading, Genius Trading Services, BetVision, and In-Play MultiBet) ("the Accused Products"). Through Defendant's illegal and unauthorized use of Plaintiff's patented technology, Defendant has earned significantly increased profits, revenue, market capital, and market share.

18. Plaintiff brings this action to seek damages for and ultimately to stop Defendant's continued infringement of Plaintiff's patents, including in particular the '687, '218, and '697 Patents (collectively, the "Asserted Patents"; Exhibits 1-3). As a result of Defendant's unlawful competition in this District and elsewhere in the United States, Plaintiff has lost sales and profits and suffered irreparable harm, including lost market share and goodwill.

NATURE OF THE CASE

19. Plaintiff brings claims under the patent laws of the United States, 35 U.S.C. § 1, *et seq*., for infringement of the Asserted Patents. Defendant has infringed and continues to infringe each of the Asserted Patents under at least 35 U.S.C. §§271(a), 271(b) and 271(c).

THE PARTIES

20. Plaintiff, SportsCastr Inc., is the owner by assignment of each of the Asserted Patents.

21. Plaintiff has launched multiple video-streaming products incorporating its patented technologies, including for example the SportsCastr mobile app for sports fans and journalists and PANDA Studio, a B2B video streaming platform for sports media, betting operators and affiliates.

22. Plaintiff is a registered business in Delaware.

23. On information and belief, Defendant Genius Sports is a foreign entity incorporated in the United Kingdom with its headquarters and principal place of business in London, England. (S*ee,* PANDA_000028-PANDA_000047, https://geniussports.com/contact-us/.)

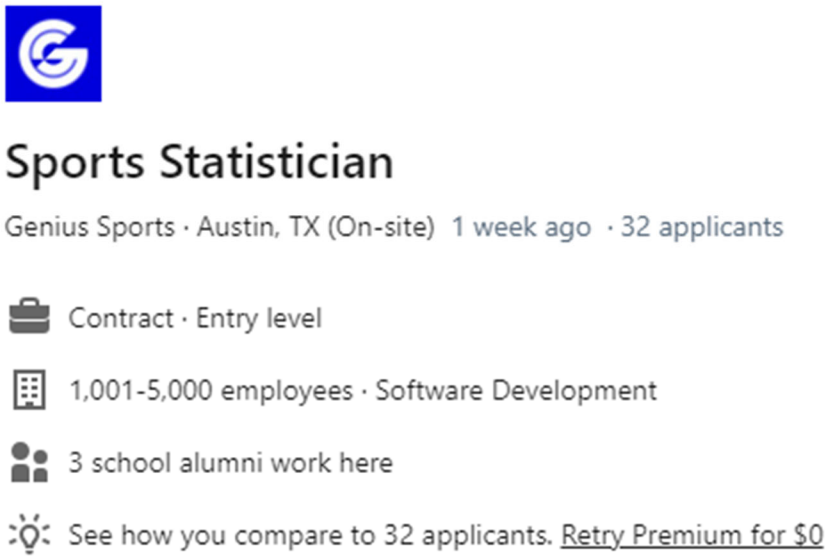
JURISDICTION & VENUE

24. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1, et seq. The Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

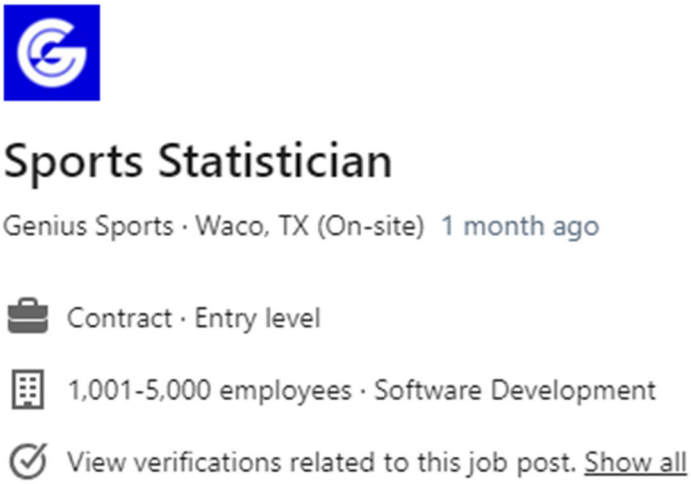
25. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c) and 28 U.S.C. § 1400(b). Upon information and belief, Genius Sports is a foreign entity over which venue is proper under 28 U.S.C. §1391(c). On information and belief, Genius Sports has also committed acts of infringement within this District.

26. On information and belief, Genius Sports is subject to this Court's specific and general personal jurisdiction, pursuant to due process and Tex. Civ. Prac. & Rem. Code § 17.042, due at least to its recruitment activities and employment of citizens of Texas in this forum.

27. On information and belief, Genius Sports has a regular and established practice of recruiting employees for work in Texas in furtherance of its business, and specifically in relation to the Accused Products. For example, as shown below, Genius Sports is actively recruiting an on-site sports statistician in Texas in connection with furthering its business and offering for sale and selling the Accused Products:



(*See*, PANDA_000136, https://www.linkedin.com/jobs/view/sports-statistician-at-genius-sports-3693048275/.) Genius Sports had previously posted an opening for another sports statistician in Waco, TX only a month earlier:



(*See*, PANDA_000048, https://www.linkedin.com/jobs/view/sports-statistician-at-genius-sports-3679122706/.) On information and belief, the exemplary recruiting effort is demonstrative of a larger recruiting effort to recruit citizens of Texas to perform jobs in relation to the Accused Products. This conduct adequately shows Genius Sports does business in Texas sufficient to establish jurisdiction under Tex. Civ. Prac. & Rem. Code § 17.042.

28. This Court has personal jurisdiction over Genius Sports in the State of Texas and in this District. Genius Sports has purposely directed its activities toward the State of Texas which give rise to the causes of action asserted by Plaintiffs such that the exercise of personal jurisdiction by courts within the State of Texas is fair and reasonable. On information and belief, Genius Sports is a foreign corporation with significant contacts with this District. Through its activities in this District, Genius Sports has directly and/or through intermediaries including partners, purposefully and voluntarily placed products and/or provided services that practice the systems and methods claimed in the Asserted Patents into the stream of commerce with the intention and expectation that they will be purchased and used by customers in the State of Texas and within this District. As an example, on February 17, 2023, Genius Sports entered into an exclusive data distribution agreement entitled "Official Betting Data Distribution Partner and Free-to-Play

Provider of the League," with the XFL, which is headquartered in Arlington, TX. (S*ee,* PANDA_000051-PANDA_000054, https://investors.geniussports.com/news/news-details/2023/XFL-and-Genius-Sports-Strike-Official-Data-Distribution-and-Fan-Engagement-Partnership/default.aspx; PANDA_000019-PANDA_000020, https://www.arlingtontx.gov/news/my_arlington_t_x/news_stories/xfl_hub_arlington.) Through this agreement, Sports Genius provided services that practice the systems and methods claimed in the Asserted Patents in the State of Texas and within this District.

29. On information and belief, Genius Sports also uses a network of partners to provide the Accused Products and implementation services for the Accused Products to its customers the State of Texas and within this District. Genius Sports has already entered into data partnerships with U.S. professional sports leagues, including the National Basketball Association, the National Football League, the Extreme Football League, Major League Baseball, and NASCAR. (S*ee,* PANDA_000130-PANDA_000131, https://www.reuters.com/article/genius-sports-group-ma-dmy-technologygro/update-1-uks-genius-sports-to-go-public-in-1-5-bln-deal-with-new-york-listed-spac-idUSL4N2HI202.)

30. On information and belief, Genius Sports places these products and/or provides services in the stream of commerce with the knowledge and intention that they are used by persons residing in Texas. On information and belief, the Accused Products are used in multiple neighboring states that have legalized gambling, including Louisiana and Arkansas. (S*ee,* PANDA_000132-PANDA_000135, https://www.bettexas.com/news/Genius__Sports-s-brandt-iden-bullish-on-texas-sports-betting-being-legalized. *See also,* PANDA_000206-PANDA_000208, https://www.gamingtoday.com/news/louisiana-sports-betting-texans-crossing-state-border-impact/.)

31. On information and belief, notwithstanding Texas state law, numerous residents in Texas utilize products, including the Accused Products, to place sports wagers. Studies from Eilers & Krejcik Gaming indicate that Texas residents place as many as two million offshore bets a year on sports, totaling an estimated $8.7 billion. During Texas' recent legislative session, Representative Jeff Leach, who represents residents within this District in the Texas House of Representatives, authored legislation to address the large volume of illegal sports betting that occurs in the State of Texas. Rep. Leach testified before a House committee, "The hundreds of thousands of Texans, who every year are placing nearly $7 billion in sports wagers, are doing so illegally and they're doing so criminally. We have the opportunity with this legislature to implement smart, safe and efficient oversight over the sports betting industry and sports wagering activities in the state of Texas." (*See,* PANDA_00225-PANDA_00227, https://www.statesman.com/story/news/politics/state/2023/03/24/texas-legislature-sports-betting-gambling-casino-rick-perry-jeff-leach/70042725007/.)

32. Furthermore, Genius Sports has entered into streaming and broadcast agreements with multiple networks and broadcasters who broadcast sports media in the State of Texas and within this District. For example, Genius Sports partnered with DraftKings to provide sportsbook data and live video feeds for over 170,000 sporting events per year. (S*ee,* PANDA_000009-PANDA_000014, https://www.cnbc.com/2021/08/05/draftkings-partners-with-genius-sports-for-sports-betting.html.) As previously noted, Genius Sports has exclusive data rights with the XFL, and the XFL's "Hub" for all eight of the League's team is located in Arlington, TX. (S*ee,* Bates Number PANDA_000019-PANDA_000020, https://www.arlingtontx.gov/news/my_arlington_t_x/news_stories/xfl_hub_arlington.) Arlington's Choctaw Stadium serves as the in-week practice facility for both the Arlington Renegades and the Houston Roughnecks, and it

is the home stadium for the Arlington Renegades.

(*See,* PANDA_000019 at PANDA_000020, https://www.arlingtontx.gov/news/my_arlington_t_x/news_stories/xfl_hub_arlington.)

33. Texas is home to 12 major league men's professional teams and two major league women's professional teams. Three of these teams are located in this District—the Dallas Cowboys, the Dallas Stars, and FC Dallas, each of which are headquartered in Frisco, Texas.

34. Texas is also home to numerous college-level sports teams. Four NCAA Division 1 Colleges are located in this District.

35. On information and belief, Genius Sports and/or its partners intentionally use and profit from data and video from professional and college-level Texas sports teams through the Accused Products. For example, Genius Sports has partnered with the NCAA to develop the NCAA LiveStats solution, which provides a statistics technology platform for various college-

level sports, including basketball, volleyball, soccer and football. (*See*, PANDA_000512-PANDA_000525, http://fs.ncaa.org/Docs/stats/ForSIDs/LiveStats.pdf; *see also* PANDA_000526-PANDA_000529, https://ncaamanager.com/ncaa/home.) While this partnership does not currently include betting rights, betting is not required in order for the Accused Products to infringe the Asserted Patents as set out below, and certain NCAA members have already begun discussions of legalizing sports betting in states where it is currently not allowed. (*See*, PANDA_000530-PANDA_000532, https://www.espn.com/chalk/story/_/id/23502387/sports-betting-ncaa-announces-10-year-data-partnership-genius-sports.)

36. For at least these reasons, personal jurisdiction exists under Tex. Civ. Prac. & Rem. Code § 17.042 and venue is proper in this District under 28 U.S.C. §1391(c).

PLAINTIFF'S PATENTED INNOVATIONS

37. Plaintiff PANDA Interactive, and its predecessors, were all pioneers and leading innovators in developing and providing advanced video streaming solutions, including SportsCastr and PANDA Studio that offers technology platforms that enable live and interactive video streaming enhanced with vibrant real-time visuals and overlays that are contextually matched and synchronized with any live or pre-recorded video.

38. The Asserted Patents discussed below capture technology, features, and processes that reflect these innovations, and improve on traditional video streaming systems.

39. The '687, '218, and '697 Patents are part of the same patent family and generally disclose and claim systems and processes related to video streaming with contextual-matched event information. Plaintiff owns by assignment the entire right, title, and interest in and to the '687, '218, and '697 Patents.

40. The ’687 Patent is entitled “Systems, apparatus, and methods for scalable low-latency viewing of broadcast digital content streams of live events, and synchronization of event information with viewed streams, via multiple internet channels,” was filed on September 24, 2019, and was duly and legally issued by the United States Patent and Trademark Office (“USPTO”) on October 13, 2020. The ’687 Patent claims priority to provisional application No. 62/371,558, filed on August 5, 2016. A true and correct copy of the ’687 Patent is attached as Exhibit 1.

41. The ’218 Patent is entitled “Systems, apparatus and methods for rendering digital content relating to a sporting event with online gaming information,” was filed on January 5, 2021, and was duly and legally issued by the USPTO on June 15, 2021. The ’218 Patent claims priority to the same provisional application as the ’687 Patent. A true and correct copy of the ’218 Patent is attached as Exhibit 2.

42. The ’697 Patent is entitled “Systems, apparatus, and methods for scalable low-latency viewing of broadcast digital content streams of live events, and synchronization of event information with viewed streams, via multiple internet channels,” was filed on February 5, 2019, and was duly and legally issued by the USPTO on September 24, 2019. The ’697 Patent claims priority to the same provisional application as the ’687 Patent. A true and correct copy of the ’697 Patent is attached as Exhibit 3.

43. Conventional video streaming systems hard-embedded event information into the video signals and delivered them together to viewers. (*See*, Exhibit 2, ’218 Patent, at 28:59-65), which had the drawbacks discussed above, including processing overhead and limited licensing and rights.

44. Conventional approaches to live video streaming had significant shortcomings that

often lead to frustrating user experiences. For example, the viewer latency, *i.e.*, the delay between a first user generating a live video stream for transmission via the Internet and a second user receiving a copy of the live video stream via the Internet for viewing, was still significant. (*See*, Exhibit 2, '218 Patent, at 2:40-52.) For example, mainstream platforms such as Twitch.tv and Facebook had about 10-15 seconds of view latency. *Id*.

45. Furthermore, conventional video streaming systems also had difficulties in providing relatively low latency copies of live video streams with relatively high quality (e.g., high-definition HD and high bit rate, such as 2 to 5 megabits per second) or allowing for different classes or types of viewers to flexibly access copies of a live video stream via different live streaming formats, which may lead to different qualities of service. (Exhibit 2, '218 Patent, at 2:55-65.)

46. By contrast, the methods and systems disclosed and claimed in the Asserted Patents provide a novel and specific technological improvement over the prior art, by among other things, performing live video streaming that is enhanced with a one-to-many socket architecture for real-time, contextually matched and actionable event information, in which one socket of a socket server dedicated to a particular event allows multiple viewer client devices to establish an event information channel with the socket server, such that the event information is shared in a synchronized manner by all broadcasters/viewers following the particular event. (Exhibit 2, '218 Patent, at 20:16-30; 21:56-22:4; 22:26-57; 23:4-18; 27:23-45; 29:43-61; 53:34-50.) To this end, the patented technologies use a web server to provide viewers with an identifier of the particular event, also referred to as EventID, which corresponds to the socket dedicated to a particular event. Viewers who are interested in watching the live stream of the particular event can then use the received EventID to connect to the dedicated server. In response, the socket server transmits the

event information associated with the particular event back to the viewers via an event information channel. (Exhibit 2, ’218 Patent, at 22:5-25; 23:37-63.)

47. The event information channel that is configured to transmit event information to viewers is separate from a video channel that is configured to transmit video signals, which can be the live video of the event being streamed or any other video-based commentary (*e.g.*, provided by broadcasters). Providing sockets dedicated to the event information and separate from the live stream of video-based commentary provides for user-interactive features in connection with the event information, such as clickable overlays, screen animations, and special effects graphics incorporating the event information. For example, the user may interact with an overlay or on screen graphic including the event information to obtain access to additional (and in some cases more detailed) information relating to the event (*e.g.*, a drill down on more granular event information, or a redirect to a web site or other app related to the particular event) or to make a transaction such as placing a bet or purchasing merchandise. (Exhibit 2, ’218 Patent, at 7:26-47; 23:4-18; 27:1-22; 29:43-61.)

48. Each of the claimed inventions of the Asserted Patents is necessarily rooted in computer technology—in other words, the synchronized streaming of events and associated event information to multiple viewers is fundamentally and inextricably a problem experienced with computer technology and networks—and addresses this fundamental computer technology problem with a computer technology solution.

49. In addition, the Asserted Patents improve the technical functioning of the computer network using techniques, such as one-to-many socket architecture and separate communication channels for video and other event information. The architectural difference between the patented technologies and prior art systems effectively addresses identified

weaknesses in conventional systems and processes. (*See*, *e.g.*, Exhibit 2, '218 Patent, at 26:37-27:45; 28:59-29:61.)

50. For example, one technical challenge overcome by the inventive concepts described and claimed in the Asserted Patents relates to the display of event information updates (if present, e.g., if the broadcast is associated with an event), as well as screen animations and other special effects graphics that may be generally associated with the video associated with a live stream, in a manner that is synchronized across multiple live streams with appreciably low latency. This is a particularly relevant consideration when multiple broadcasters are providing video-based commentary for the same event, and each of these broadcasters may have multiple viewers of their broadcast. Accordingly, the technical challenge is to provide the same event information, and periodic updates to this event information, in a synchronized and low-latency manner to all of these broadcasters and viewers interested in following the same event. (Exhibit 2, '218 Patent, at 26:39-56.)

51. The Asserted Patents describes and claims a technological solution implemented on both the client devices and the server architecture to which the client devices are communicatively coupled. This technological solution involves the use of multiple communication channels respectively dedicated to video content from a given broadcaster and event information germane to an event about which any broadcaster may be providing video-based commentary. (Exhibit 2, '218 Patent, at 26:56-67.)

52. As discussed above, event information and updates to event information are provided to broadcaster client devices and viewer client devices via a socket-based "event information channel" dedicated to the event, which is separate from the copy of the live stream of video-based commentary provided on a "video channel." Thus, all viewers and broadcasters

of the event, regardless of which live stream they may be generating or watching, connect to one or more sockets of a socket server that is/are dedicated to the event, such that all live streams relating to the event are similarly synchronized to event information and updates to same. (Exhibit 2, '218 Patent, at 27:1-13.)

53. Notably, if a viewer switches amongst different broadcasters of the same event (*e.g.*, the viewer originally watches a first live stream from a first broadcaster of the event, and later selects a second live stream from a second broadcaster of the same event), the event information and updates to the same remain synchronized with all live streams from the different broadcasters, providing for a smooth experience across multiple broadcasters and viewers, thus enabling broadcasters and rights-holders offer personalized broadcasts in multiple languages and vantage points. (Exhibit 2, '218 Patent, at 27:14-22.)

54. Another technical challenge overcome by the Asserted Patents relates to client-side rendering of overlays, on-screen interactive animation, special effects, and/or event information. By way of background, in conventional sports broadcasting, game information (such as player and betting stats), and current score information, also sometimes referred to as a "scorebug," as well as screen animations and other special effects graphics, are hard-embedded into the live stream of the game broadcast itself that is received by viewers. (Exhibit 2, '218 Patent, at 28:59-65.) This hard-embedding approach is inflexible and may cause licensing issues for right holders if the video feed is modified to add customized event information.

55. Unlike conventional systems, in the technological solution offered by the Asserted Patents, graphics and effects are generated by the client device itself, separate from a given broadcaster's video-based commentary or other video signals, and then integrated with (*e.g.*, superimposed or overlaid on) the broadcaster's video-based commentary or other video

signals when rendered on the display of the client device. (Exhibit 2, ’218 Patent, at 28:65-29:10).

56. In summary, the patented technologies, via the one-to-many architecture and separate channels for video and event information, improve computer network functionality by facilitating scalable and appreciably low-latency viewing of both live events and video-based commentary about an event by significant numbers of viewers as the event unfolds. Particularly in the context of live sports and sports betting broadcasts, a discernible delay between the observation of the event itself and a given broadcaster’s video-based commentary would significantly undermine viewer experience. (Exhibit 2, ’218 Patent, at 4:42-58.) The patented technologies also improve computer network functionality by improving the speed of content transfer from broadcaster devices to viewer devices and synchronization of various content amongst multiple client devices. (Exhibit 2, ’218 Patent, at 24:59-25:11.) The patented technologies further improve computer network functionality by improving the processing efficiency of broadcaster and viewer client devices via execution of the client app, while at the same time reducing memory storage requirements for the client app on the client devices. *Id*.

ACCUSED PRODUCTS

57. Defendant offers, sells, and uses several products that provide and implement video streaming platforms for individuals and enterprises and incorporate Plaintiff’s patented technologies.

58. Out of the various applications of the patented video streaming technology, Defendant chose to implement it in sports betting products and services. More specifically, Defendant implements the patented technologies at least in Genius Sports, which provides a suite of products to sportsbooks that can be integrated into the sportsbook’s platform including both data feeds and video streams.

59. On information and belief, Genius Sports was founded in 2016 and before that it was known as BetGenius.

60. Presently, Genius Sports offers various data feeds for both pre-match and in-play betting. Genius Sports also announced its live video streaming service on Oct 8, 2019. The video streaming service is advertised as being paired with Genius Sport's other product offerings (sports data, live betting). Genius Sports' streaming product includes both a live stream of a sporting event and overlayed event information germane to the sporting event.

FIRST CAUSE OF ACTION
(INFRINGEMENT OF THE '687 PATENT)

61. Plaintiff realleges and incorporates by reference the allegations of the preceding paragraphs of this Complaint.

62. Defendant has infringed and continues to infringe one or more claims of the '687 Patent in violation of 35 U.S.C. § 271 in this District and elsewhere in the United States and will continue to do so unless enjoined by this Court. The Accused Products, including features of the Genius Sports' products at least when used for their ordinary and customary purposes, practice each element of at least claims 19 and 20 of the '687 Patent as demonstrated below.

63. For example, claim 19 of the '687 Patent recites:

> 19. A system for providing a first plurality of copies of a first live stream of digital content relating to a first live sporting event to a first plurality of viewer client devices, and for providing a second plurality of copies of a second live stream of digital content relating to a second live sporting event to a second plurality of viewer client devices, the system comprising:
>
> A) a plurality of media sources to:
>
> receive the first live stream of digital content and the second live stream of digital content;
>
> provide a first copy of the first plurality of copies to a first viewer client device of the first plurality of viewer client devices via a first Internet communication channel between the plurality of media sources and the first viewer

client device of the first plurality of viewer client devices; and

provide a first copy of the second plurality of copies to a first viewer client device of the second plurality of viewer client devices via a second Internet communication channel between the plurality of media sources and the first viewer client device of the second plurality of viewer client devices;

B) a control server to periodically retrieve, via the Internet, first event information germane to the first live sporting event and second event information germane to the second live sporting event; and

C) at least one socket server communicatively coupled to the control server to:

receive from the control server at least some of the first event information and at least some of the second event information; and

transmit the at least some of the first event information to the first viewer client device of the first plurality of viewer client devices via a third Internet communication channel between at least one first event socket of the at least one socket server and the first viewer client device of the first plurality of viewer devices; and

transmit the at least some of the second event information to the first viewer client device of the second plurality of viewer client devices via a fourth Internet communication channel between at least one second event socket of the at least one socket server and the first viewer client device of the second plurality of viewer devices.

64. Claim 20 of the ’687 Patent, which depends from claim 19, recites:

20. The system of claim 19, wherein:

in A), the plurality of media sources:

provide a second copy of the first plurality of copies to a second viewer client device of the first plurality of viewer client devices via a third video Internet communication channel between the plurality of media sources and the second viewer client device of the first plurality of viewer client devices; and

provide a second copy of the second plurality of copies to a second viewer client device of the second plurality of viewer client devices via a fourth video Internet communication channel between the plurality of media sources and the second viewer client device of the second plurality of viewer client devices; and

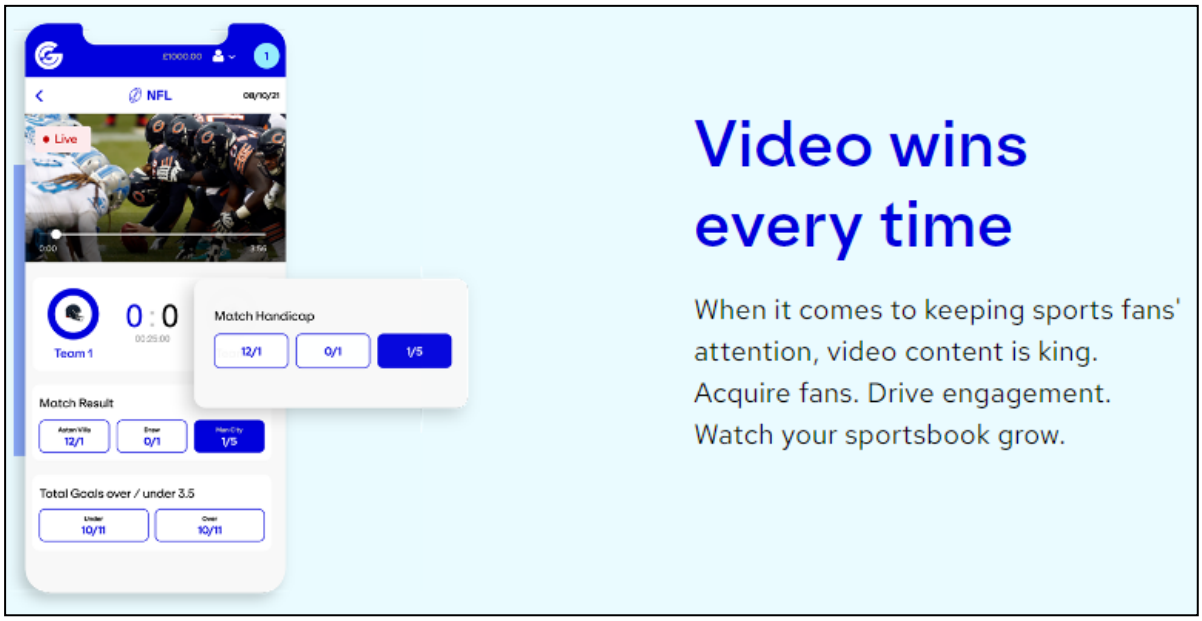
in C), the at least one socket server:

transmits at least the first event information to the second viewer client

device of the first plurality of viewer client devices via a third event information Internet communication channel between the at least one first event socket of the at least one socket server and the second viewer client device of the first plurality of viewer devices; and

transmits at least the second event information to the second viewer client device of the second plurality of viewer client devices via a fourth event information Internet communication channel between the at least one second event socket of the at least one socket server and the second viewer client device of the second plurality of viewer devices.

65. The Accused Products include each element of claims 19 and 20 of the '687 Patent. To the extent the preamble is construed to be limiting, the Accused Products include *a system for providing a first plurality of copies of a first live stream of digital content relating to a first live sporting event to a first plurality of viewer client devices, and for providing a second plurality of copies of a second live stream of digital content relating to a second live sporting event to a second plurality of viewer client devices*. For example, Genius Sports' streaming product practices a system for providing video streams of sporting events (e.g., football match) to viewers' devices (e.g., a computer, a laptop, a smartphone or a tablet, etc.).



(*See,* PANDA_000055 at PANDA_000057,

https://www.geniussports.com/sportsbook/streaming/.)

66. Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

> ***New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.***
>
> Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.
>
> Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.
>
> By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.
>
> All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.
>
> International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.
>
> Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.
>
> "Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

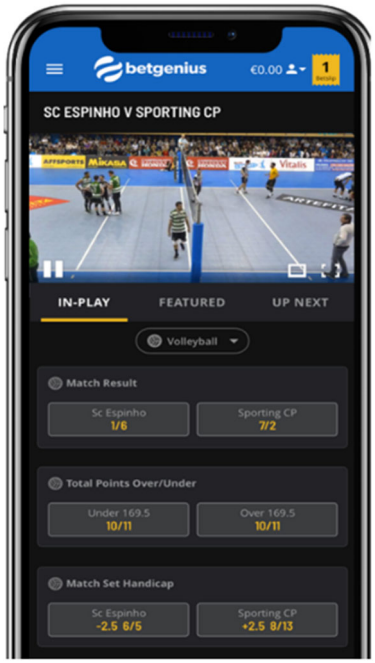
67. As described below, Genius Sports delivers "thousands of low latency live streams" from top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

> Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has agreed to a major expansion of its long-term partnership with Tipsport, a leading Czech sportsbook operator across retail and online.
>
> Tipsport has agreed to a substantial uplift in the number of annual events covered by Genius Sports' suite of data-driven PreMatch, LiveData and LiveTrading solutions while maintaining full flexibility and control over each element of its sportsbook.
>
> Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipsport will have access to Genius Sports' full NFL product suite, including access to the league's real-time statistics, proprietary Next Gen Stats (NGS) and official sports betting data feed.
>
> Genius Sports will also deliver thousands of low latency streams through its rapidly expanding Streaming solution. Tipsport customers will benefit from an enhanced live betting experience through live streams of top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

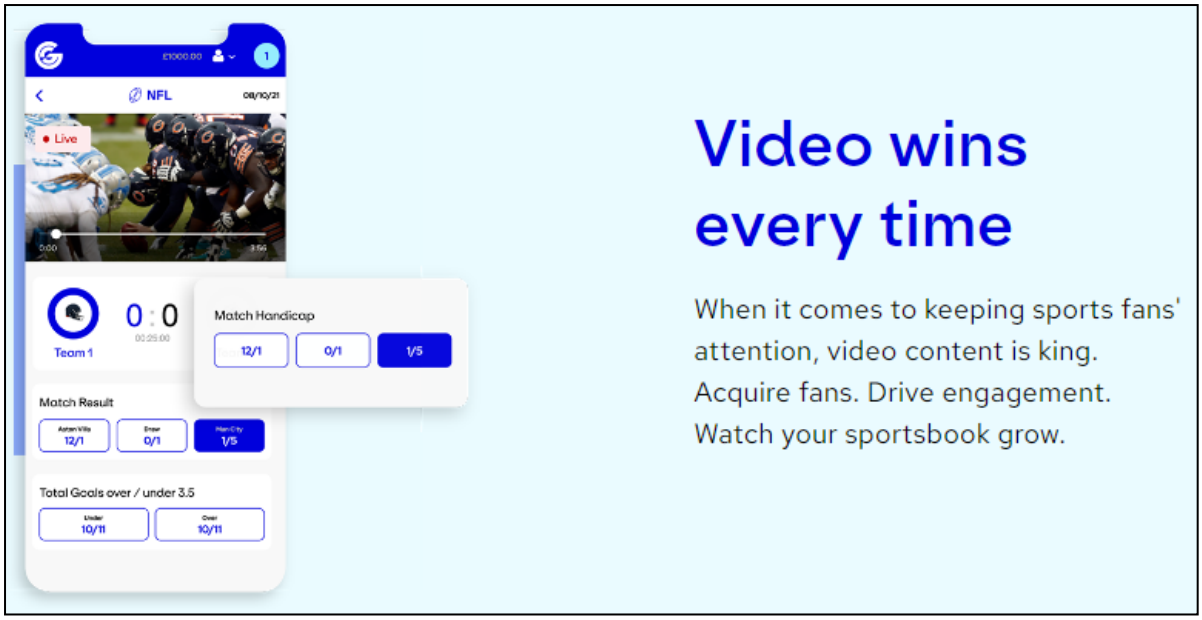
(*See,* PANDA_000176-PANDA_000177, https://geniussports.com/newsroom/genius-sports-builds-out-official-data-trading-and-live-streaming-partnership-with-tipsport/.) Genius Sports is

also the NFL's official data distributor, providing low-latency video feeds of live sporting events and allowing fans to watch and bet on NFL games. (*See*, PANDA_000555, https://www.espn.com/chalk/story/_/id/38496077/new-platform-betvision-lets-fans-watch-bet-nfl-same-screen.) Genius Sports also delivers live streams of various other sporting events within the United States.

68. The Accused Products include *a plurality of media sources to receive the first live stream of digital content and the second live stream of digital content*. For example, Genius Sports maintains an expansive portfolio of live sporting event video feeds, as mentioned above, and the Accused Products utilize a plurality of media sources to receive the live streams of digital content.

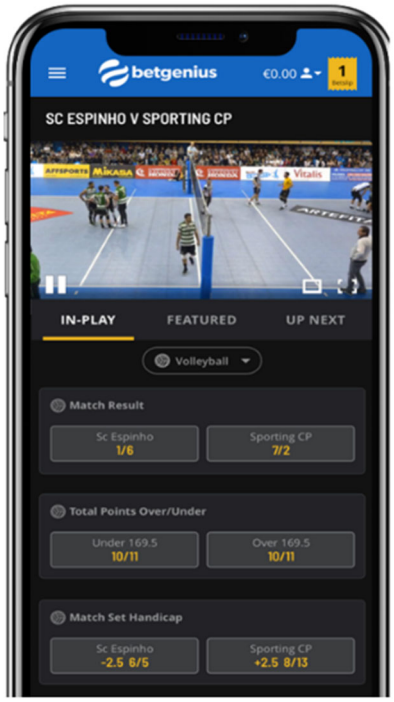


(S*ee,* PANDA_000015, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)



(*See,* PANDA_000055 at PANDA_000057, https://www.geniussports.com/sportsbook/streaming/.)

69. The Accused Products also includes *a plurality of media sources to provide a first copy of the first plurality of copies to a first viewer client device of the first plurality of viewer client devices via a first Internet communication channel between the plurality of media sources and the first viewer client device of the first plurality of viewer client devices and provide a first copy of the second plurality of copies to a first viewer client device of the second plurality of viewer client devices via a second Internet communication channel between the plurality of media sources and the first viewer client device of the second plurality of viewer client devices*. For example, Genius Sports' streaming product combines live sports data and live sports video.



(*See,* PANDA_000015, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

70. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…":

> ***New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.***
>
> Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.
>
> Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.
>
> By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.
>
> All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.
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> International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.
>
> Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.
>
> "Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

71. Genius Sports offers two options for sportsbooks to receive its live video stream offerings: (1) a Drop & Play video player developed in-house by Genius Sports that can be embedded in a sportsbook's webpage, and (2) a video API that can facilitate access to Genius Sport's live streams using a sportsbook's own video player. Both options result in a copy of a video stream being provided to a viewer client device. Authentication data (e.g., a URL, token, DRM) is transmitted to the client device, which is passed to a video player on the client device (e.g., the video player embedded in a sportsbook's website). The video player then requests and receives a copy of the video stream from an appropriate CDN using the authentication data.

72. Option (1): Drop & Play: For this option, Genius Sports provides a video player widget that can be integrated by a sportsbook into its website. When a user/viewer requests a video stream while using the sportsbook's website, the back-end of the sportsbook's website transmits a query to Genius Sport's video API to retrieve authentication data related to the selected video stream. When the sportsbook's website retrieves this information, the authentication data is passed along to the video player, which in turn transmits a request from a CDN to retrieve the video stream. In this manner, a copy of the video stream is provided to the video player on the viewer client device via a communication channel between the CDN (e.g., a media source) and the viewer client device.

Insert a script tag defining the desired fixture and the bookmaker source:

```
1 <script
2   src="https://genius-live-player-production.betstream.betgenius.com/widgetLoader?
customerId=YOUR_CUSTOMER_ID&fixtureId=YOUR_FIXTURE_ID">
3 </script>
```

Insert an element with defined id to attach the video player to it, should be the exact same one used as the script **containerId** parameter

```
1 <div id="YOUR_CONTAINER_ID" /> <!-- Defaults to geniusLive if a containerId is not set -->
```

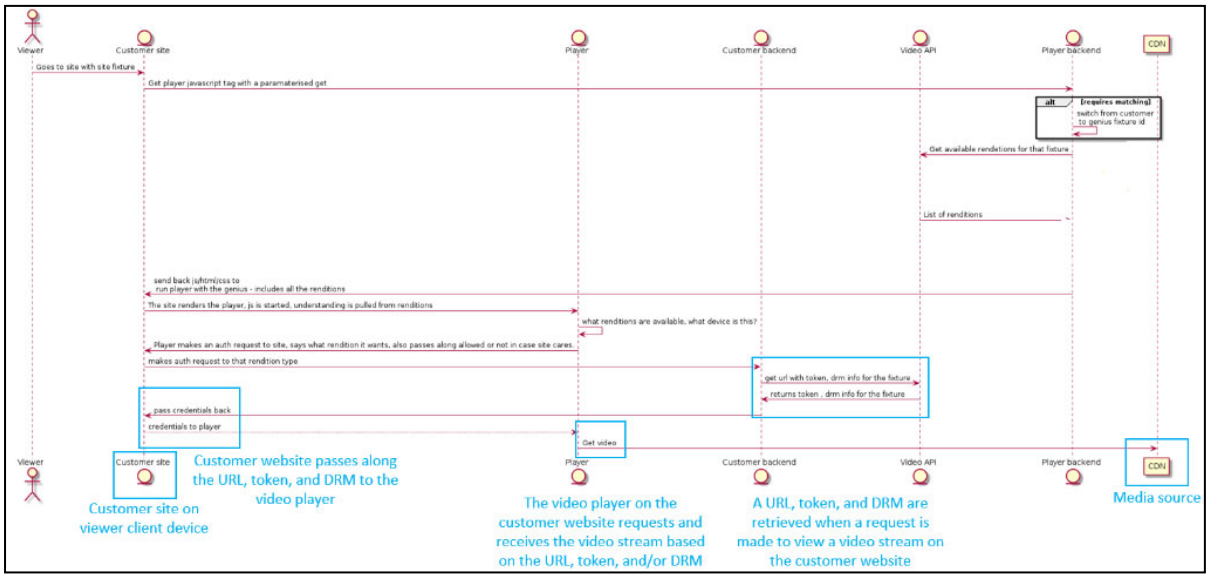
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

You embed a script tag in your site with the querystring parameters you are interested in passing to the player. Our player looks at the stream types available for the specific fixture you are trying to display and picks the most appropriate stream for your viewers device. Our script will then raise an event out to the containing window, with the necessary information to make a call to our API from your backend.

Our API should never be called from the browser directly.

The call to our backend, which is per fixture viewer session, retrieves a url, a token and any DRM information which you may need to play the fixture. You hand the response straight back to our player and it will play the fixture. Sensible HTTP error codes will be returned from our API around the status of the fixture and whether you have booked it.



(S*ee,* PANDA_000541, PANDA_000550, https://dap-docs.betstream.betgenius.com/how-to-integrate.)

73. Option (2): Video API: For this option, the back-end of the sportsbook's website first requests and retrieve authentication data (e.g., a URL, a token, and/or DRM) related to the selected video stream and then passes this information along to a video player to request and retrieve the video stream. The sportsbook provides its own video player, which is configured to use CDN token authentication. A copy of the video stream is provided to the sportsbook's own video player on the client device via a communication channel between the CDN and the client device. This process is depicted below.

GL-Video-v3 3.0.33

[Base URL: api.geniussports.com/Video-v3/PRODSTD]
https://explorer.api.geniussports.com/Video/v3/PRODSTD/swagger-latest.json

Video Streaming API

The video streaming API is used by customers to:

- Retrieve the schedule of upcoming streams.
- Retrieve the streaming parameters for a particular fixture.
- Retrieve the full list of possible regions for playback.

This API does not deliver the video stream itself, it only tells what are the specific parameters for streaming a given fixture. It is up to the users of this API to configure a video player with the streaming parameters. This API must never be called from the browser/client side. Instead, the API should be integrated into your server-side systems. This avoids exposing authentication credentials and manage the load on Geniuslive systems.

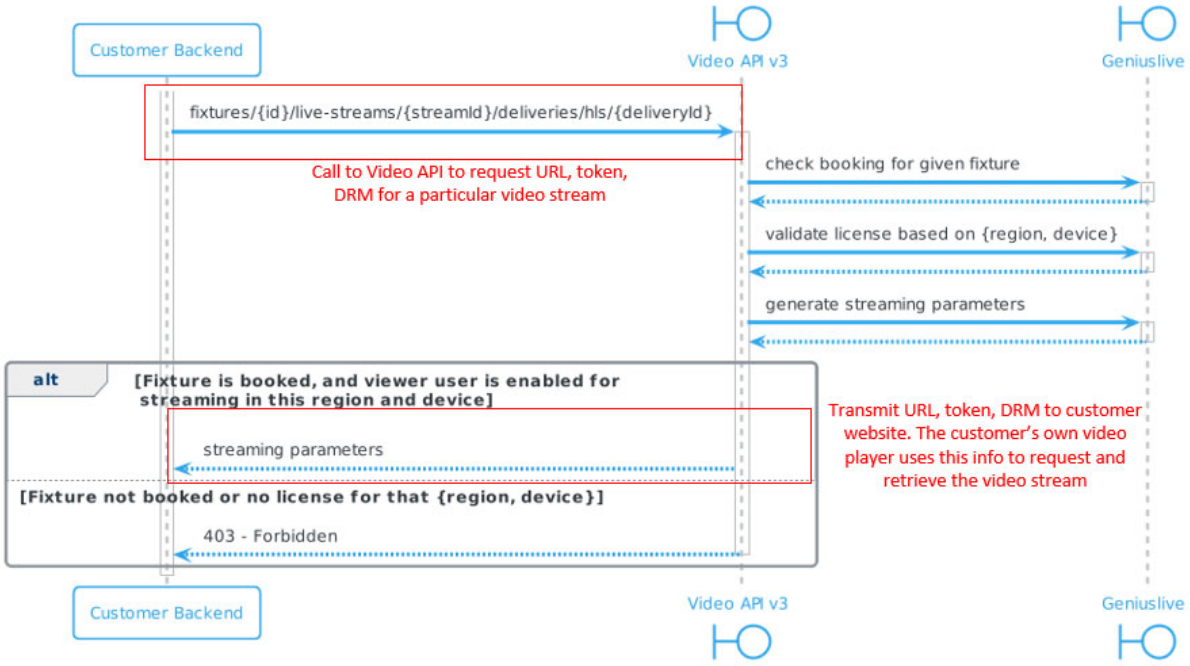
Player integration

You will need to add the necessary logic in your web site to call your backend to retrieve the schedule and the streaming parameters described before. Also, you will need to integrate a player in your site that can apply CDN token authentication. For specific competitions your player will also have to decrypt content using DRM.

Playing the content

Once you have retrieved the schedule and you have selected a fixture to watch, your site should do the following per viewer:

1. Geo-locate the viewer to know the region where the playback is requested
2. Validate if the viewer meets at least one of the permissions required by the selected live stream
3. Select the appropriate delivery to play from the selected live stream. You might need to check the client's platform to choose between HLS or DASh deliveries.
4. Call your backend to get the streaming parameters from the Video API.
5. Play the content using CDN token authentication (and DRM for specific competitions)



(*See,* PANDA_00217, PANDA_00222, https://swaggerui.api.geniussports.com/?url=https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json.)

74. The Accused Products also include *a control server to periodically retrieve, via the Internet, first event information germane to the first live sporting event and second event*

information germane to the second live sporting event. For example, Genius Sports' streaming product provides fixture information, such as "Sport, Start (local time of user), Competition, Fixture, FixtureId, Coverage, Lineups, and Assigned", as well as "Statistics."

Schedule

This is where you select the booked fixtures for viewing.

For each fixture, you will see the following information:

- **Sport** - the sport of the fixture
- **Start (local time of user)** - the start time of the match, in *your* time zone (based on your device's current time).
- **Competition** - the league or tournament to which this match belongs.
- **Fixture** - the teams or competitors in this match.
- **FixtureId** - unique id per fixture per sport
- **Coverage** - indicates whether the event is covered from the Venue or TV
- **Lineups** - indicates whether the event has lineup information or not
- **Assigned** - check this box to add this fixture to your **Live** tab.

The **All Fixtures** tab displays all available fixtures in your selected date range. The **Scheduled Fixtures** tab displays only fixtures that you have selected.

By default, the Schedule displays fixtures with start times from -3 hours to +12 hours from the current time. Use the **Filter** button to expand your selection of fixtures, and to filter by coverage type and lineups availability

⚠ Not all fixtures from the selected Date Range are loaded at once. The user can see the first batch of fixtures and scrolling down will automatically load more fixtures.

(S*ee,* PANDA_000196 at PANDA_000198, https://geniussports.atlassian.net/wiki/spaces/BID/pages/1511621214/Live+Viewer+-+User+Manual.)

Statistics

Statistics show the number of events of each type in this match, per side.

Clicking the opens Time Based Statistics filter menu.

User can apply only one of the filters from the list, which updates the statistics based on the selected filter. Text with the selected filter is shown in the top right corner of the component

- Last 5 mins
- Last 10 mins
- Last 15 mins
- Between 0 - 15 mins
- Between 15 - 30 mins
- Between 30 - 45 mins
- Between 45 - 60 mins
- Between 60 - 7 5mins
- Between 75- 90 mins
- First Half
- Second Half
- Since last Goal
- Since last Red Card
- Extra-tme

(*See,* PANDA_000196 at PANDA_000200-PANDA_000201, https://geniussports.atlassian.net/wiki/spaces/BID/pages/1511621214/Live+Viewer+-+User+Manual.)

75. Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.

Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.

Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.

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"Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

76. Genius Sports also delivers dozens of FIBA basketball and FIVB volleyball leagues globally.

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Tipsport has agreed to a substantial uplift in the number of annual events covered by Genius Sports' suite of data-driven PreMatch, LiveData and LiveTrading solutions while maintaining full flexibility and control over each element of its sportsbook.

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Genius Sports will also deliver thousands of low latency streams through its rapidly expanding Streaming solution. Tipsport customers will benefit from an enhanced live betting experience through live streams of top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

(*See,* PANDA_000176-PANDA_000177, https://geniussports.com/newsroom/genius-sports-builds-out-official-data-trading-and-live-streaming-partnership-with-tipsport/.)

77. The Accused Products include *at least one socket server communicatively coupled to the control server to receive from the control server at least some of the first event information and at least some of the second event information*. For example, Genius Sports' streaming product sends "a stream of messages over a long running socket" to accomplish the "API call to send real time data to the Warehouse/Statistics Engine."

Introduction

This API call is to send real time data to the Warehouse/Statistics Engine. It is accomplished by sending a stream of messages over a long running socket. Pending network problems the connection should remain open for the length of the match.

Connection

There are two different ways to establish a publish connection to the system a HTTP method or a RAW method. These two different ways exists to enable the client to potentially work around any port or proxy problems present at in venue areas. Connections can also be sent over one of two different ports, 80 or 5522

The same data, parameters and format is used in both methods, only the startup of the connection differs.

RAW

In the RAW method, a socket is opened to the streaming API endpoint and the request string is sent, followed by two carriage returns (`\n\n`) or two carriage return line feeds (`\r\n\r\n`). To initiate RAW mode the nohttp parameter must be present and set in the request string.

```
/v2/{sport}/publish
```

Example - HTTP

```
POST /v2/basketball/publish?streamKey=TESTSTREAMKEY&timestamp=1412987153 HTTP/1.1
Host: localhost:8000
Connection: keep-alive
```

Example - RAW

```
/v2/basketball/publish?nohttp=1&streamKey=TESTSTREAMKEY&timestamp=1412987153
```

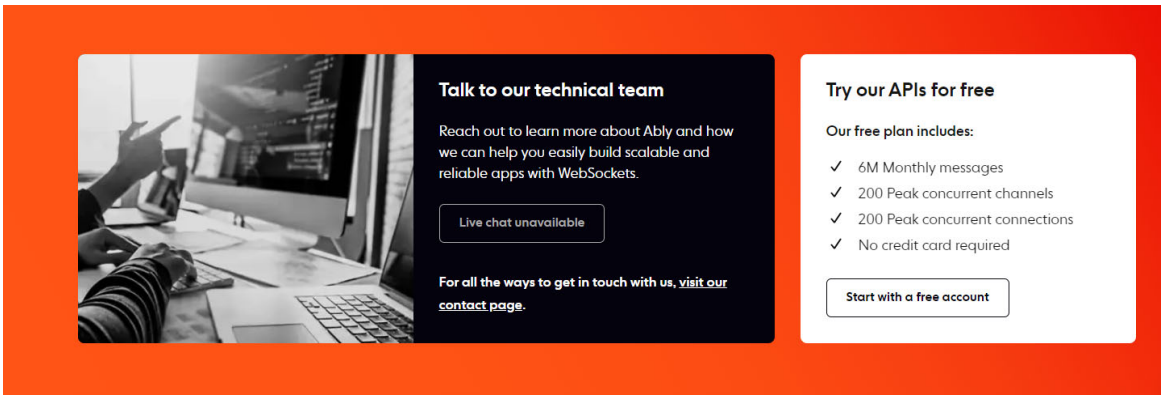
(*See,* PANDA_000139-PANDA_000141, https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

78. In addition, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

Infrastructure teams can "sleep easy" and developers are free to innovate

Genius Sports now relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport. Concerns about latency are gone - with 300+ points of presence across a global edge network, Ably effortlessly maintains sub-65ms latency at global scale. That ensures live data delivery to Genius Sports' customers is always 3-4 seconds ahead of video, which protects the integrity of in-play betting and customer revenues.

Meanwhile, Gary and his team can "sleep easier at night", knowing that business critical data is no longer at the mercy of complex and increasingly unstable on-premises infrastructure; the daily rush to address hardware issues is a thing of the past. In turn, that has eliminated annual hardware costs and freed up around 30 hours per month in RabbitMQ maintenance that Genius Sports' developers and engineers can now refocus on service optimisation and innovation.



(*See* https://ably.com/case-studies/genius-sports)

79. The Accused Products include *at least one socket server communicatively coupled to the control server to transmit the at least some of the first event information to the first viewer client device of the first plurality of viewer client devices via a third Internet communication channel between at least one first event socket of the at least one socket server and the first viewer client device of the first plurality of viewer devices and transmit the at least some of the second event information to the first viewer client device of the second plurality of viewer client devices via a fourth Internet communication channel between at least one second event socket of the at least one socket server and the first viewer client device of the second plurality of viewer devices.* For example, Genius Sports offers a Multibet widget, which can be integrated into the front-end of the sportsbook's platform. An end user using the sportsbook's platform can request a bet via the widget and the widget can thereafter retrieve the data needed to populate the end user's betslip. This data includes, for example, the bet generated by the sportsbook's trading platform, which is transmitted by Genius Sports' back-end (e.g., its Pricing Engine) to the Multibet widget. Although the bets are generated dynamically by the sportsbook's platform, the bets are always stored by Genius Sports for re-use.

> In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.
>
> It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

(S*ee,* PANDA_000065,

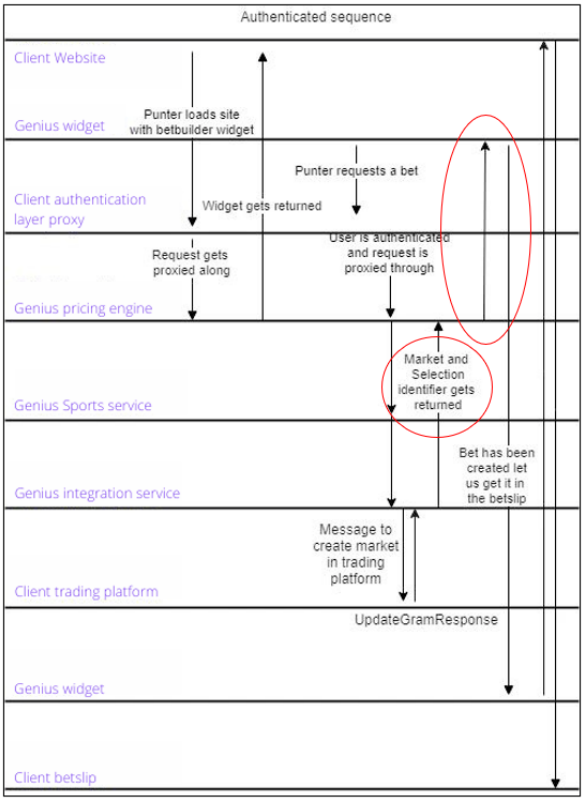
https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> Please note that latest platform response for each unique Multibet market will be stored on Genius Sports' system in order to be re-used for subsequent bets.

(S*ee,* PANDA_000533 at PANDA_000535,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664043/Multibet+Sportsbook+Integration+V3#Sportsbook-Trading-Platform-Response-to-Multibet-Market-Messages.)

80. In addition, the Accused Products transmit at least the bet generated by the sportsbook's trading platform to Genius widget on client's device, via the Internet.



(*See,* PANDA_000001, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284776797/Authenticating+User-Session+Using+a+Proxy+Service.)

81. Communication between the Multibet widget and Genius Sport's back-end is accomplished using Genius Sport's SmartStream integration. SmartStream products are embedded within a webpage via an iframe.

Multibet Widget Integration

Our customers should embed the Multibet Widget through an iframe. When a player made his choice and requests a bet, the Multibet Widget will make a call to the customer's bet slip with all the required data to populate it with the selection details.

The technical information for the front-end integration can be found in the following space - SmartStream Integrations.

Customers that have already integrated with other Fan Engagement products such as betting widgets, Game Trackers, and Scoreboards can re-use the existing iframe implementation for the Multibet Widget.

(*See,* PANDA_000065,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

This page describes how to integrate with the variety of SmartStream products with examples.

All SmartStream products are hosted by Genius Sports and designed to be embedded within a client hosted webpage via an iframe.

(*See,* PANDA_000077,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

SmartStream Release Process

SmartStream is released to it's user acceptance testing (UAT) environment every two weeks with new features and bug fixes. Release notes will be published at the start of each cycle detailing what features and fixes are to be included in the release.

After two weeks have passed with no critical issues, the version will be pushed to Production where it will be visible on your live site. It is at your discretion that you keep track of these release notes to ensure you are still successfully integrating and that you are satisfied with the new and upcoming version of SmartStream.

A separate UAT SmartStream URL will be included as part of your integration details for you to use. It is highly recommended that you maintain a replica environment of your own site with the UAT version of SmartStream integrated to enable you to review up-and-coming features and fixes before they reach Production.

Embedding a product

To display the HTML SmartStream product on your page you will first need to add the following scripts into the body of the page, preferably at the bottom to ensure that the SmartStream application is loaded after the elements of the page itself. The demo URLs should be replaced with your customer specific URLs, which will be provided by Genius Sports once a client specific version of the application has been generated.

```
<script src="https://bsdemo.betstream.betgenius.com/betstrear
  <script>
          var iframeApi = new IFrameApi("betgenius-iframe");
  </script>
```

The iframe code below should be placed within the body of the webpage where you would like the HTML SmartStream product application to appear. The script below is an example that embeds a Football Scorecentre product and should be replaced with the location of your client specific product which will be provided by Genius Sports. The id of the iframe should match the parameter passed in the JavaScript object above.

```
<iframe scrolling="no" id="betgenius-iframe" src="https://bs
```

(*See,* PANDA_000077-PANDA_000078,

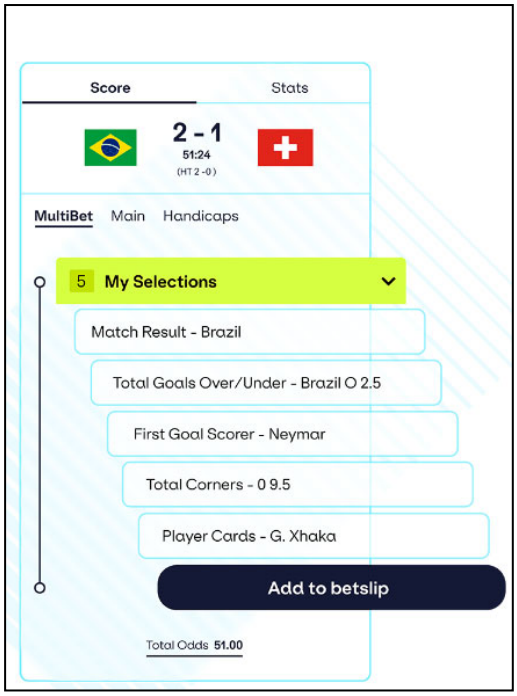
https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

82. As shown below, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.

More in-play profits

In-Play MultiBet is a high-margin live betbuilder product, where revenues mount as users add selections to their betslips.

Players create the exact accumulator they want, during a single game, for example - *Ronaldo to score, Portugal to win, Over 5.5 Corners, Penalty awarded to Portugal.*



(*See,* PANDA_000111 at PANDA_000112-PANDA_000113,

https://geniussports.com/sportsbook/betting-data-odds/in-play-multibet/.)

- Genius Sports to provide sportsbooks with automated, AI-powered live odds enabling bettors to place same-game parlays during live play or game intervals
- The new product will be available for the FIFA World Cup, NFL, English Premier League and thousands of other official Genius events

Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has launched *In-Play MultiBet*, providing sportsbooks with a powerful new tool to engage players and grow revenues in time for the FIFA World Cup 2022 and ongoing NFL season.

Same-game parlay bets, which enable bettors to wager on multiple events occurring within the same game, have become an essential part of every major sportsbook's offering, giving customer's greater control over their bets and enhanced margins for the operators themselves.

Now, through *In-Play MultiBet*, these bespoke bets can be placed once the game has begun, enabling players to place bets after every goal, touchdown and during intervals.

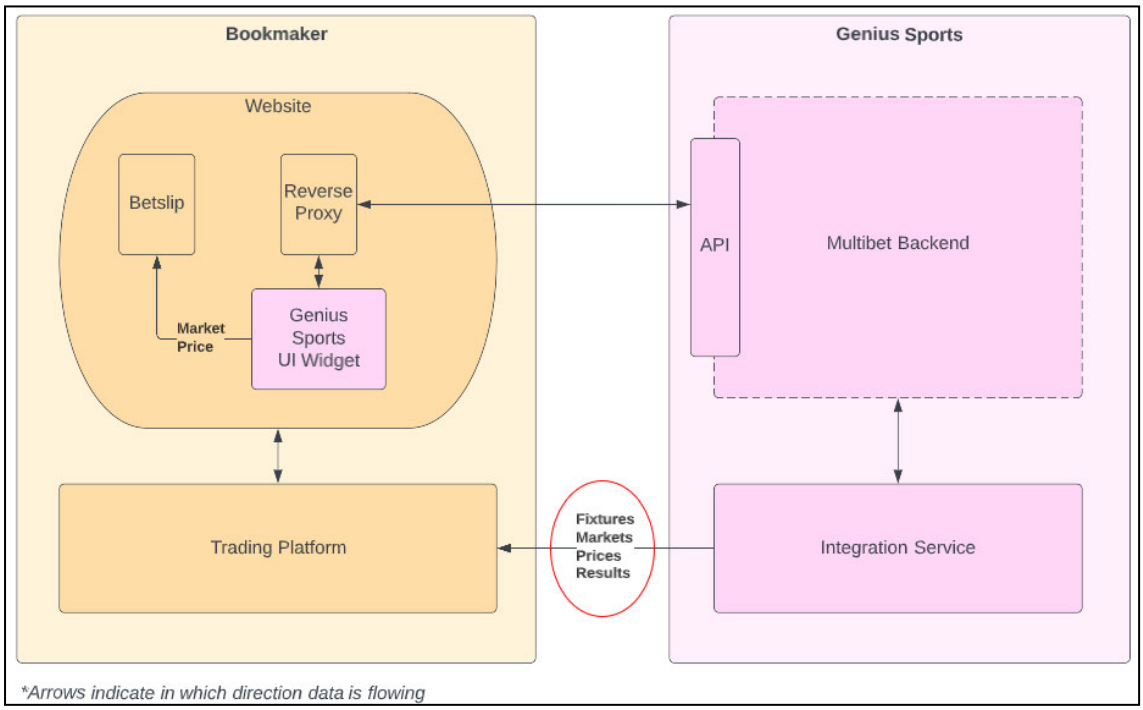
Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

InPlay MultiBet will also be available across the NFL, English Premier League, Liga MX, and dozens of FIBA basketball and FIVB volleyball leagues worldwide.

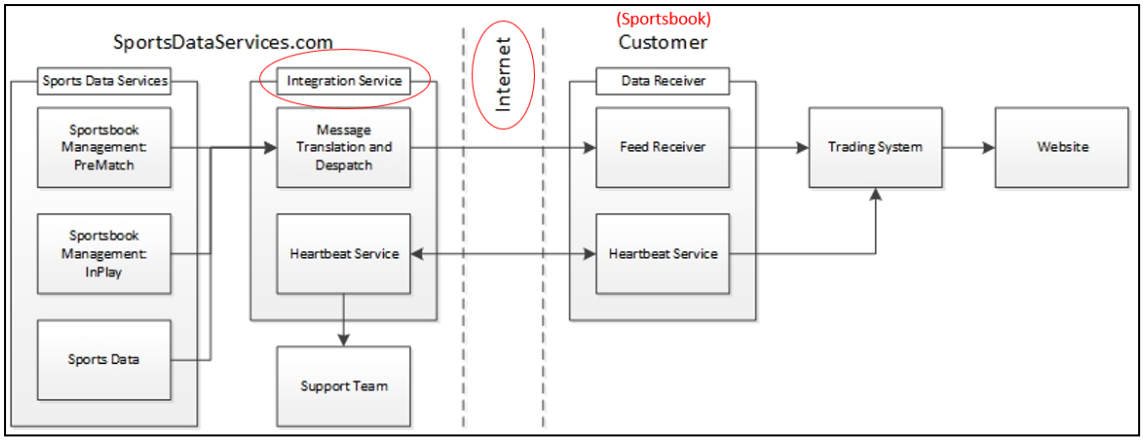
"Combining same game parlays with the unstoppable growth of in-play betting is a breakthrough innovation for us and our partners," said **Jack Davison, Chief Commercial Officer of Genius Sports**. "Starting with the biggest sports event of the year, the FIFA World Cup, *InPlay MultiBet* will enable our partners to unlock bigger margins and drive engagement between key match events and breaks."

(S*ee,* PANDA_000179-PANDA_000180, https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/.)

83. During operation, Genius Sport's Integration Service (provided by Sportsbook Integration (V3)) transmits various data (fixtures, markets, prices, results) to the sportsbook's trading platform via an Internet connection. Additionally, the Integration Service transmits a message to create a market (bet) in the sportsbook's trading platform. In return, the generated bet is transmitted from the trading platform to the Integration Service. In this manner, the sportsbook and Genius Sports services retrieve information germane to the first live sporting event via the Internet.

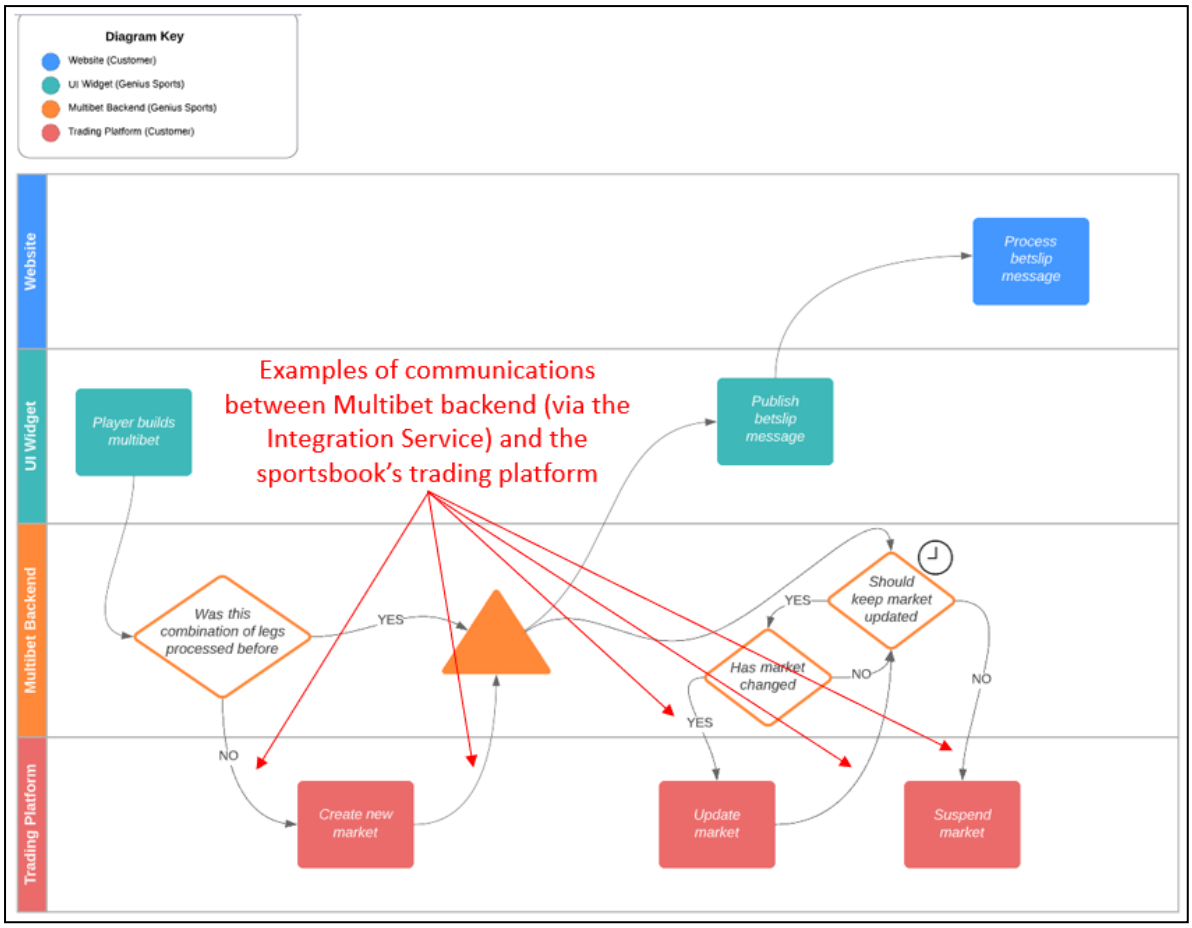


(S*ee,* PANDA_00212 at PANDA_00213, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664027/Multibet+Back-End+Integration.)



(*See,* PANDA_000539,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/34822492/Integration+Schema.)



84. The Accused Products include a plurality of media sources to *provide a second copy of the first plurality of copies to a second viewer client device of the first plurality of viewer*

client devices via a third video Internet communication channel between the plurality of media sources and the second viewer client device of the first plurality of viewer client devices and provide a second copy of the second plurality of copies to a second viewer client device of the second plurality of viewer client devices via a fourth video Internet communication channel between the plurality of media sources and the second viewer client device of the second plurality of viewer client devices. For example, the Genius Sports platform supports multiple users viewing the same sporting event simultaneously, such that a second viewer client device of the first plurality of viewer client devices will be provided a second copy of the first plurality of copies.

85. Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.

Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.

Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.

By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.

All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.

International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.

Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.

"Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

86. The Accused Products also include *the at least one socket server to transmit at least the first event information to the second viewer client device of the first plurality of viewer client devices via a third event information Internet communication channel between the at least*

one first event socket of the at least one socket server and the second viewer client device of the first plurality of viewer devices and transmit at least the second event information to the second viewer client device of the second plurality of viewer client devices via a fourth event information Internet communication channel between the at least one second event socket of the at least one socket server and the second viewer client device of the second plurality of viewer devices. For example, the Genius Sports platform supports multiple users viewing the same sporting event simultaneously, such that a second viewer client device of the first plurality of viewer client devices will be provided a second copy of the first plurality of copies.

87. Genius Sports offers a Multibet widget, which can be integrated into the front-end of the sportsbook's platform. An end user using the sportsbook's platform can request a bet via the widget and the widget can thereafter retrieve the data needed to populate the end user's betslip. This data includes, for example, the bet generated by the sportsbook's trading platform, which is transmitted by Genius Sports' back-end (e.g., its Pricing Engine) to the Multibet widget. Although the bets are generated dynamically by the sportsbook's platform, the bets are always stored by Genius Sports for re-use.

> In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.
>
> It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

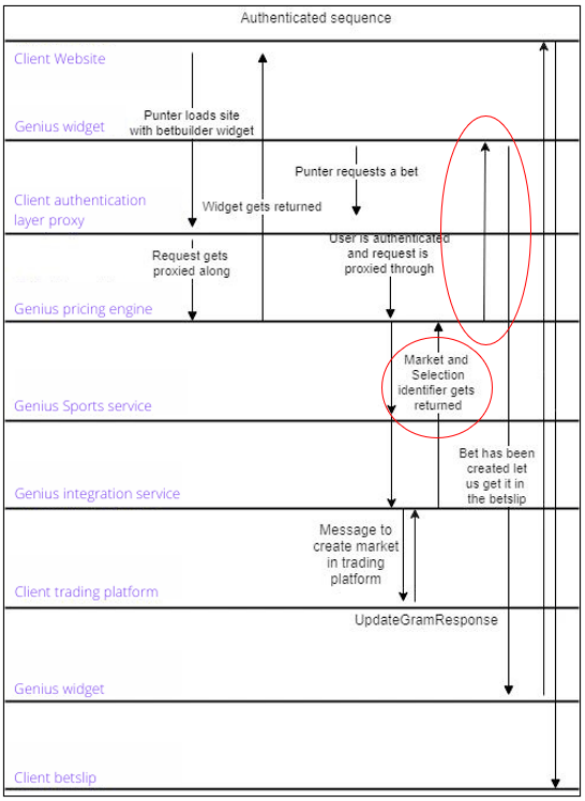
(S*ee,* PANDA_000065,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

Please note that latest platform response for each unique Multibet market will be stored on Genius Sports' system in order to be re-used for subsequent bets.

(*See,* PANDA_000533 at PANDA_000535, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664043/Multibet+Sportsbook+Integration+V3#Sportsbook-Trading-Platform-Response-to-Multibet-Market-Messages.)

88. The screenshot below confirms that Genius Sports transmits at least the bet generated by the sportsbook's trading platform to Genius widget on client's device (e.g., a computer, a laptop, a smartphone or a tablet) via the Internet.



(*See,* PANDA_000001, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284776797/Authenticating+User-Session+Using+a+Proxy+Service.)

89. Communication between the Multibet widget and Genius Sport's back-end is accomplished using Genius Sport's SmartStream integration. SmartStream products are embedded within a webpage via an iframe..

> **Multibet Widget Integration**
>
> Our customers should embed the Multibet Widget through an iframe. When a player made his choice and requests a bet, the Multibet Widget will make a call to the customer's bet slip with all the required data to populate it with the selection details.
>
> The technical information for the front-end integration can be found in the following space - SmartStream Integrations.
>
> Customers that have already integrated with other Fan Engagement products such as betting widgets, Game Trackers, and Scoreboards can re-use the existing iframe implementation for the Multibet Widget.

(*See,* PANDA_000065,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> This page describes how to integrate with the variety of SmartStream products with examples.
>
> All SmartStream products are hosted by Genius Sports and designed to be embedded within a client hosted webpage via an iframe.

(*See,* PANDA_000077,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

SmartStream Release Process

SmartStream is released to it's user acceptance testing (UAT) environment every two weeks with new features and bug fixes. Release notes will be published at the start of each cycle detailing what features and fixes are to be included in the release.

After two weeks have passed with no critical issues, the version will be pushed to Production where it will be visible on your live site. It is at your discretion that you keep track of these release notes to ensure you are still successfully integrating and that you are satisfied with the new and upcoming version of SmartStream.

A separate UAT SmartStream URL will be included as part of your integration details for you to use. It is highly recommended that you maintain a replica environment of your own site with the UAT version of SmartStream integrated to enable you to review up-and-coming features and fixes before they reach Production.

Embedding a product

To display the HTML SmartStream product on your page you will first need to add the following scripts into the body of the page, preferably at the bottom to ensure that the SmartStream application is loaded after the elements of the page itself. The demo URLs should be replaced with your customer specific URLs, which will be provided by Genius Sports once a client specific version of the application has been generated.

```
<script src="https://bsdemo.betstream.betgenius.com/betstrear
  <script>
        var iframeApi = new IFrameApi("betgenius-iframe");
  </script>
```

The iframe code below should be placed within the body of the webpage where you would like the HTML SmartStream product application to appear. The script below is an example that embeds a Football Scorecentre product and should be replaced with the location of your client specific product which will be provided by Genius Sports. The id of the iframe should match the parameter passed in the JavaScript object above.

```
<iframe scrolling="no" id="betgenius-iframe" src="https://bs
```

(*See,* PANDA_000077-PANDA_000078, https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

90. Genius Sports offers several data-related product offerings to provide sportsbooks various data streams (betting data, sports data). In one example, Genius Sports' streaming product uses Multibet, which allows end users (e.g., bettors) to place same-game parlays during a sports match. Multibet is specifically offered to sportsbooks for integration into their trading platform.

91. As shown in the screenshots below, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.

More in-play profits

In-Play MultiBet is a high-margin live betbuilder product, where revenues mount as users add selections to their betslips.

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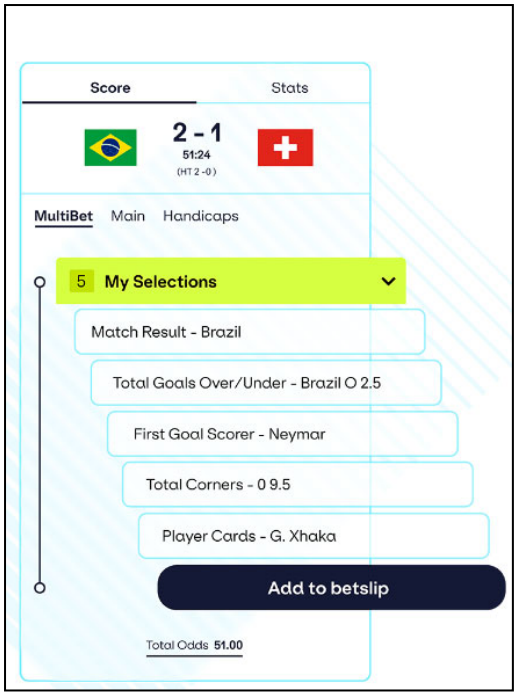

(*See,* PANDA_000111 at PANDA_000112-PANDA_000113,

https://geniussports.com/sportsbook/betting-data-odds/in-play-multibet/.)

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- The new product will be available for the FIFA World Cup, NFL, English Premier League and thousands of other official Genius events

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(S*ee,* PANDA_000179-PANDA_000180, https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/.)

92. Each claim in the ’687 Patent recites an independent invention. Neither claims 19 and 20, described above, nor any other individual claim is representative of all claims in the ’687 Patent.

93. Defendant has been aware of the ’687 Patent since at least the filing of this Complaint. Further, Plaintiff provided affirmative notice of the ’687 Patent to Defendant by sending a letter on October 4, 2023, informing Defendant of its infringement of the ’687 Patent. Additionally, Plaintiff has met with and had communications with executives at Genius Sports since 2018.

94. Defendant directly infringes at least claims 19 and 20 of the ’687 Patent, either literally or under the doctrine of equivalents, by making, using, offering to sell, and selling the systems described above.

95. Defendant’s partners, customers, and end users of its Accused Products and corresponding systems and services directly infringe at least claims 19 and 20 of the ’687 Patent, literally or under the doctrine of equivalents, at least by using the Accused Products and corresponding systems and services, as described above.

96. Defendant has actively induced and are actively inducing infringement of at least claims 19 and 20 of the ’687 Patent with specific intent to induce infringement, and/or willful blindness to the possibility that its acts induce infringement, in violation of 35 U.S.C. § 271(b). For example, Defendant encourages and induces customers to use the Accused Products in a manner that infringes claims 19 and 20 of the ’687 Patent at least by offering and providing the software and by engaging in activities relating to selling, marketing, advertising, promotion,

installation, support, and distribution of the Accused Products.

97. Defendant encourages, instructs, directs, and/or requires third parties—including its certified partners and/or customers—to use the Accused Products in infringing ways.

98. Defendant further encourages and induces its customers to infringe claims 19 and 20 of the ’687 Patent: 1) by widely advertising those services, and providing technical support and instructions to users, and 2) through activities relating to marketing, advertising, promotion, installation, support, and distribution of the Accused Products, including its video streaming software, and services in the United States.

99. Further, as the entity that provides installation, implementation, and integration of the Accused Products in addition to ensuring the Accused Product remains operational for each customer through ongoing technical support, on information and belief, Defendant and/or its partners affirmatively aid and abet each customer’s use of the Accused Products in a manner that infringes the ’687 Patent.

100. Defendant also contributes to the infringement of its partners, customers, and end-users of the Accused Products by providing within the United States or importing into the United States the Accused Products, constituting a material part of the inventions claimed, and not a staple article or commodity of commerce suitable for substantial non-infringing uses.

101. Indeed, as shown above, the Accused Products have no substantial non-infringing uses because the accused functionality, including the one-to-many socket architecture and separate channels for video and event information, is an integral part of the Accused Products and must be performed for the Accused Products to perform their intended purpose. These functionalities are continually running when the system is in use and, on information and belief, cannot be removed or disabled (or, if they could, the system would no longer suitably function

for its intended purpose). Moreover, for the same reasons, without the system and components identified above that practice the ’687 Patent, that functionality could not be performed.

102. Additionally, the accused functionality, including the one-to-many socket architecture and separate channels for video and event information, itself has no substantial non-infringing uses because the components, modules and methods identified above are a necessary part of that functionality. For example, without the one-to-many socket architecture, the Accused Products could not effectively synchronize the event information across multiple viewers. These functionalities are continually running when the system is in use and cannot be removed or disabled (or, if they could, the system would no longer suitably function for its intended purpose). Moreover, for the same reasons, without the system and components identified above that practice claimed in the ’687 Patent, that functionality could not be performed.

103. In addition, as shown in the detailed analysis above, the products, systems, modules, and methods provided by Defendant constitutes a material part of the invention—indeed, they provide all the components, modules, and features that perform the claimed methods and systems. For example, the Accused Products and accused functionalities (*e.g.*, the one-to-many architecture) constitute a material part of the inventions claimed because such architecture is integral to the system as recited in the claims of the ’687 Patent. None of these products are staple goods—they are sophisticated and customized video-streaming products, methods, and systems.

104. On information and belief, the infringing actions of each partner, customer, and/or end-user of the Accused Products are attributable to Defendant. For example, on information and belief, Defendant directs and controls the activities or actions of its partners or others in connection with the Accused Products by contractual agreement or otherwise requiring partners

or others to provide information and instructions to customers who acquire the Accused Products which, when followed, results in infringement. Defendant further directs and controls the operation of devices executing the Accused Products by programming the software which, when executed by a customer or end user, performs the claimed method of at least claims 19 and 20 of the ’687 Patent.

105. Plaintiff has suffered and continues to suffer damages, including lost profits, as a result of Defendant’s infringement of the ’687 Patent. Defendant is therefore liable to Plaintiff under 35 U.S.C. § 284 for damages in an amount that adequately compensates Plaintiff for Defendant’s infringement, but no less than a reasonable royalty.

106. Plaintiff will continue to suffer irreparable harm unless this Court preliminarily and permanently enjoins Defendant, its agents, employees, representatives, and all others acting in concert with Defendant from infringing the ’687 Patent.

107. Defendant’s infringement of the ’687 Patent is knowing and willful. Defendant acquired actual knowledge of the ’687 Patent at least upon the filing of this Complaint. Further, Plaintiff provided affirmative notice of the ’687 Patent to Defendant by sending a letter on October 4, 2023, informing Defendant of its infringement of the ’687 Patent.

108. On information and belief, despite Defendant’s knowledge of the Asserted Patents and Plaintiff’s patented technologies, Defendant made the deliberate decision to sell products and services that it knew infringe the ’687 Patent. Defendant’s continued infringement of the ’687 Patent with knowledge of the ’687 Patent constitutes willful infringement.

109. Plaintiff’s allegations of direct infringement, indirect infringement, and willful infringement with respect to this patent are further set forth in Exhibit 4.

SECOND CAUSE OF ACTION
(INFRINGEMENT OF THE ’218 PATENT)

110. Plaintiff realleges and incorporate by reference the allegations of the preceding paragraphs of this Complaint.

111. Defendant has infringed and continue to infringe one or more claims of the ’218 Patent in violation of 35 U.S.C. § 271 in this District and elsewhere in the United States and will continue to do so unless enjoined by this Court. The Accused Products, including features of the Genius Sports’ products at least when used for their ordinary and customary purposes, practice each element of at least claims 1 and 4 of the ’218 Patent as demonstrated below.

112. For example, claim 1 of the ’218 Patent recites:

> 1. A system for controlling a plurality of viewer client devices to receive first digital content relating to a first sporting event and first event information germane to the first sporting event, the first event information including online gaming information, the system comprising:
>
> A) a control server to periodically retrieve, via the Internet, the first event information germane to the first sporting event;
>
> B) at least one socket server communicatively coupled to the control server to:
>
> receive from the control server at least the first event information; and
>
> transmit at least some of the first event information, including the online gaming information, to at least a first viewer client device of the plurality of viewer client devices via a first event information Internet communication channel between a first event socket of the at least one socket server and the first viewer client device, wherein the first event socket corresponds to the first event information germane to the first sporting event; and
>
> C) at least one webserver communicatively coupled to the at least one socket server to transmit, to the first viewer client device:
>
> a first Internet address of a first media source to establish a first video Internet communication channel between the first media source and the first viewer client device to carry the first digital content relating to the first sporting event; and

a first socket address of the first event socket to establish the first event information Internet communication channel to carry the online gaming information.

113. Claim 4 of the ’218 Patent, which depends from claim 1, recites:

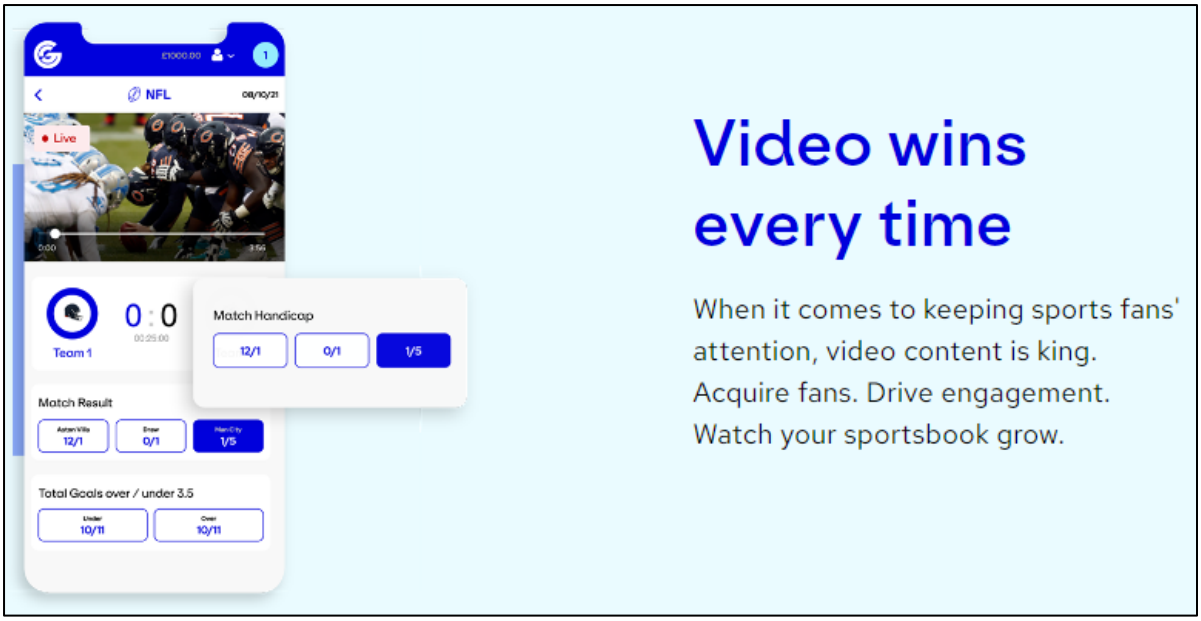
4. The system of claim 1, wherein:

in C), the at least one webserver transmits, to a second viewer client device of the plurality of viewer client devices, the first socket address of the first event socket to establish a second event information Internet communication channel between the first event socket and the second viewer client device; and

in B), the at least one socket server transmits at least some of the first event information, including the online gaming information germane to the first sporting event, to the second viewer client device via the second event information Internet communication channel, such that the online gaming information is shared in a synchronized manner by the first viewer client device and the second viewer client device.

114. The Accused Products include each element of claims 1 and 4 of the ’218 Patent. To the extent the preamble is construed to be limiting, the Accused Products include *a system for controlling a plurality of viewer client devices to receive first digital content relating to a first sporting event and first event information germane to the first sporting event, the first event information including online gaming information*.

115. For example, Genius Sports’ streaming product includes both a live stream of a sporting event and overlayed event information germane to the sporting event.



(*See* PANDA_000055 at PANDA_000057, https://www.geniussports.com/sportsbook/streaming/)

116. Genius Sports delivers "thousands of low latency live streams" from top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

> Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has agreed to a major expansion of its long-term partnership with Tipsport, a leading Czech sportsbook operator across retail and online.
>
> Tipsport has agreed to a substantial uplift in the number of annual events covered by Genius Sports' suite of data-driven PreMatch, LiveData and LiveTrading solutions while maintaining full flexibility and control over each element of its sportsbook.
>
> Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipsport will have access to Genius Sports' full NFL product suite, including access to the league's real-time statistics, proprietary Next Gen Stats (NGS) and official sports betting data feed.
>
> Genius Sports will also deliver thousands of low latency streams through its rapidly expanding Streaming solution. Tipsport customers will benefit from an enhanced live betting experience through live streams of top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

(*See,* PANDA_000176-PANDA_000177, https://geniussports.com/newsroom/genius-sports-builds-out-official-data-trading-and-live-streaming-partnership-with-tipsport/.) Genius Sports is also the NFL's official data distributor, providing low-latency video feeds of live sporting events and allowing fans to watch and bet on NFL games. (*See*, PANDA_000555,

https://www.espn.com/chalk/story/_/id/38496077/new-platform-betvision-lets-fans-watch-bet-nfl-same-screen.) Genius Sports also delivers live streams of various other sporting events within the United States.

117. The Accused Products include "*a control server to periodically retrieve, via the Internet, the first event information germane to the first sporting event*." For example, Genius Sports' streaming product provides fixture information, such as "Sport, Start (local time of user), Competition, Fixture, FixtureId, Coverage, Lineups, and Assigned", as well as "Statistics."

Schedule

This is where you select the booked fixtures for viewing.

For each fixture, you will see the following information:

- **Sport** - the sport of the fixture
- **Start (local time of user)** - the start time of the match, in *your* time zone (based on your device's current time).
- **Competition** - the league or tournament to which this match belongs.
- **Fixture** - the teams or competitors in this match.
- **FixtureId** - unique id per fixture per sport
- **Coverage** - indicates whether the event is covered from the Venue or TV
- **Lineups** - indicates whether the event has lineup information or not
- **Assigned** - check this box to add this fixture to your **Live** tab.

The **All Fixtures** tab displays all available fixtures in your selected date range. The **Scheduled Fixtures** tab displays only fixtures that you have selected.

By default, the Schedule displays fixtures with start times from -3 hours to +12 hours from the current time. Use the **Filter** button to expand your selection of fixtures, and to filter by coverage type and lineups availability

⚠ Not all fixtures from the selected Date Range are loaded at once. The user can see the first batch of fixtures and scrolling down will automatically load more fixtures.

(S*ee,* PANDA_000196 at PANDA_000198, https://geniussports.atlassian.net/wiki/spaces/BID/pages/1511621214/Live+Viewer+-+User+Manual.)

Statistics

Statistics show the number of events of each type in this match, per side.

Clicking the opens Time Based Statistics filter menu.

User can apply only one of the filters from the list, which updates the statistics based on the selected filter. Text with the selected filter is shown in the top right corner of the component

- Last 5 mins
- Last 10 mins
- Last 15 mins
- Between 0 - 15 mins
- Between 15 - 30 mins
- Between 30 - 45 mins
- Between 45 - 60 mins
- Between 60 - 7 5mins
- Between 75- 90 mins
- First Half
- Second Half
- Since last Goal
- Since last Red Card
- Extra-tme

(*See,* PANDA_000196 at PANDA_000200-PANDA_000201, https://geniussports.atlassian.net/wiki/spaces/BID/pages/1511621214/Live+Viewer+-+User+Manual.)

118. In addition, Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.

Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.

Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.

By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.

All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.

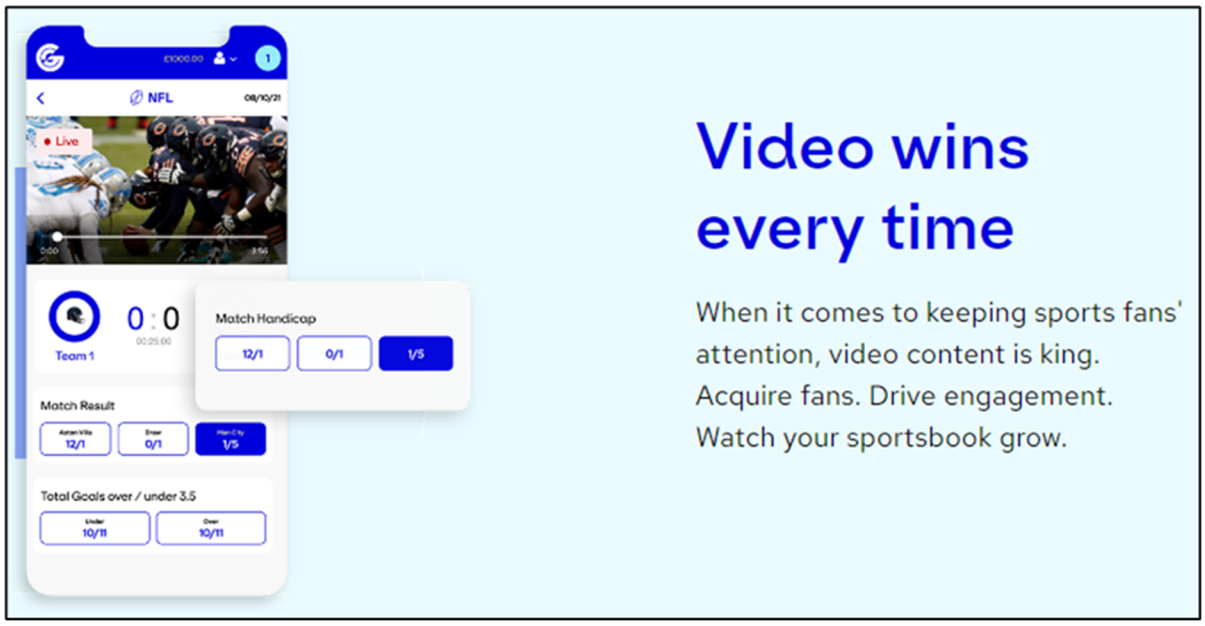
International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.

Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.

"Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-

details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)



(*See* PANDA_000055 at PANDA_000057, https://www.geniussports.com/sportsbook/streaming/.)

119. The Accused Products include *at least one socket server communicatively coupled to the control server to receive from the control server at least the first event information.* For example, Genius Sports' streaming product sends "a stream of messages over a long running socket" to accomplish the "API call to send real time data to the Warehouse/Statistics Engine."

Introduction

This API call is to send real time data to the Warehouse/Statistics Engine. It is accomplished by sending a stream of messages over a long running socket. Pending network problems the connection should remain open for the length of the match.

Connection

There are two different ways to establish a publish connection to the system a HTTP method or a RAW method. These two different ways exists to enable the client to potentially work around any port or proxy problems present at in venue areas. Connections can also be sent over one of two different ports, 80 or 5522

The same data, parameters and format is used in both methods, only the startup of the connection differs.

RAW

In the RAW method, a socket is opened to the streaming API endpoint and the request string is sent, followed by two carriage returns (`\n\n`) or two carriage return line feeds (`\r\n\r\n`). To initiate RAW mode the nohttp parameter must be present and set in the request string.

```
/v2/{sport}/publish
```

RAW

In the RAW method, a socket is opened to the streaming API endpoint and the request string is sent, followed by two carriage returns (`\n\n`) or two carriage return line feeds (`\r\n\r\n`). To initiate RAW mode the nohttp parameter must be present and set in the request string.

```
/v2/{sport}/publish
```

Example - HTTP

```
POST /v2/basketball/publish?streamKey=TESTSTREAMKEY&timestamp=1412987153 HTTP/1.1
Host: localhost:8000
Connection: keep-alive
```

Example - RAW

```
/v2/basketball/publish?nohttp=1&streamKey=TESTSTREAMKEY&timestamp=1412987153
```

(*See* PANDA_000139-PANDA_000141, https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

120. In addition, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

Infrastructure teams can "sleep easy" and developers are free to innovate

Genius Sports now relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport. Concerns about latency are gone - with 300+ points of presence across a global edge network, Ably effortlessly maintains sub-65ms latency at global scale. That ensures live data delivery to Genius Sports' customers is always 3-4 seconds ahead of video, which protects the integrity of in-play betting and customer revenues.

Meanwhile, Gary and his team can "sleep easier at night", knowing that business critical data is no longer at the mercy of complex and increasingly unstable on-premises infrastructure; the daily rush to address hardware issues is a thing of the past. In turn, that has eliminated annual hardware costs and freed up around 30 hours per month in RabbitMQ maintenance that Genius Sports' developers and engineers can now refocus on service optimisation and innovation.

Talk to our technical team

Reach out to learn more about Ably and how we can help you easily build scalable and reliable apps with WebSockets.

Live chat unavailable

For all the ways to get in touch with us, visit our contact page.

Try our APIs for free

Our free plan includes:

- ✓ 6M Monthly messages
- ✓ 200 Peak concurrent channels
- ✓ 200 Peak concurrent connections
- ✓ No credit card required

Start with a free account

(*See* https://ably.com/case-studies/genius-sports.)

121. The Accused Products include at least one socket server to *transmit at least some of the first event information, including the online gaming information, to at least a first viewer client device of the plurality of viewer client devices via a first event information Internet communication channel between a first event socket of the at least one socket server and the first viewer client device wherein the first event socket corresponds to the first event information*

germane to the first sporting event. For example, Genius Sports offers a Multibet widget, which can be integrated into the front-end of the sportsbook's platform. An end user using the sportsbook's platform can request a bet via the widget and the widget can thereafter retrieve the data needed to populate the end user's betslip. This data includes, for example, the bet generated by the sportsbook's trading platform, which is transmitted by Genius Sports' back-end (e.g., its Pricing Engine) to the Multibet widget. Although the bets are generated dynamically by the sportsbook's platform, the bets are always stored by Genius Sports for re-use.

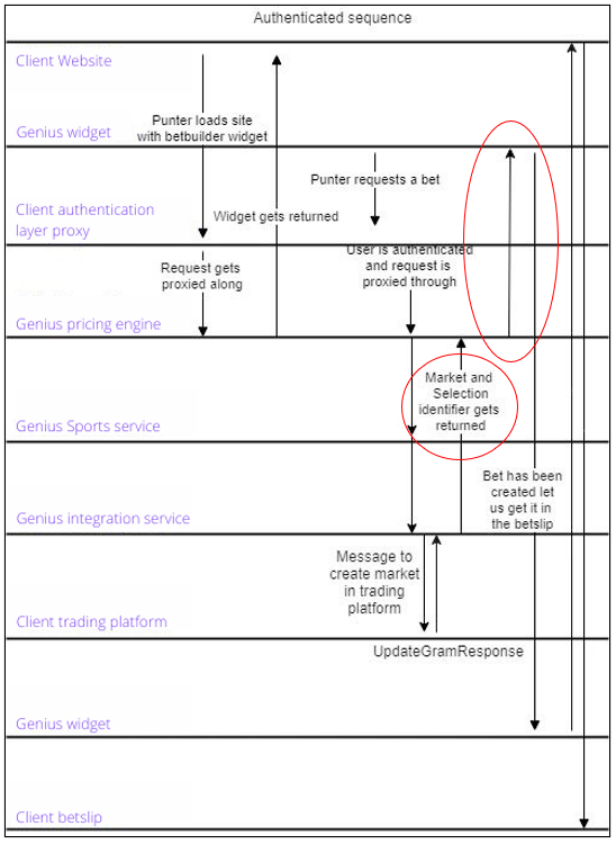
> In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.
>
> It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

(S*ee,* PANDA_000065, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> Please note that latest platform response for each unique Multibet market will be stored on Genius Sports' system in order to be re-used for subsequent bets.

(S*ee,* PANDA_000533 at PANDA_000535, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664043/Multibet+Sportsbook+Integration+V3#Sportsbook-Trading-Platform-Response-to-Multibet-Market-Messages.)

122. The screenshot below confirms that Genius Sports transmits at least the bet generated by the sportsbook's trading platform to the Genius widget on client's device via the Internet.



(*See,* PANDA_000001, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284776797/Authenticating+User-Session+Using+a+Proxy+Service.)

123. Communication between the Multibet widget and Genius Sport's back-end is accomplished using Genius Sport's SmartStream integration. SmartStream products are embedded within a webpage via an iframe.

> **Multibet Widget Integration**
>
> Our customers should embed the Multibet Widget through an iframe. When a player made his choice and requests a bet, the Multibet Widget will make a call to the customer's bet slip with all the required data to populate it with the selection details.
>
> The technical information for the front-end integration can be found in the following space - SmartStream Integrations.
>
> Customers that have already integrated with other Fan Engagement products such as betting widgets, Game Trackers, and Scoreboards can re-use the existing iframe implementation for the Multibet Widget.

(*See,* PANDA_000065,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

This page describes how to integrate with the variety of SmartStream products with examples.

All SmartStream products are hosted by Genius Sports and designed to be embedded within a client hosted webpage via an iframe.

(*See,* PANDA_000077,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

SmartStream Release Process

SmartStream is released to it's user acceptance testing (UAT) environment every two weeks with new features and bug fixes. Release notes will be published at the start of each cycle detailing what features and fixes are to be included in the release.

After two weeks have passed with no critical issues, the version will be pushed to Production where it will be visible on your live site. It is at your discretion that you keep track of these release notes to ensure you are still successfully integrating and that you are satisfied with the new and upcoming version of SmartStream.

A separate UAT SmartStream URL will be included as part of your integration details for you to use. It is highly recommended that you maintain a replica environment of your own site with the UAT version of SmartStream integrated to enable you to review up-and-coming features and fixes before they reach Production.

Embedding a product

To display the HTML SmartStream product on your page you will first need to add the following scripts into the body of the page, preferably at the bottom to ensure that the SmartStream application is loaded after the elements of the page itself. The demo URLs should be replaced with your customer specific URLs, which will be provided by Genius Sports once a client specific version of the application has been generated.

```
<script src="https://bsdemo.betstream.betgenius.com/betstrear
  <script>
        var iframeApi = new IFrameApi("betgenius-iframe");
  </script>
```

The iframe code below should be placed within the body of the webpage where you would like the HTML SmartStream product application to appear. The script below is an example that embeds a Football Scorecentre product and should be replaced with the location of your client specific product which will be provided by Genius Sports. The id of the iframe should match the parameter passed in the JavaScript object above.

```
<iframe scrolling="no" id="betgenius-iframe" src="https://bs
```

(*See,* PANDA_000077-PANDA_000078,

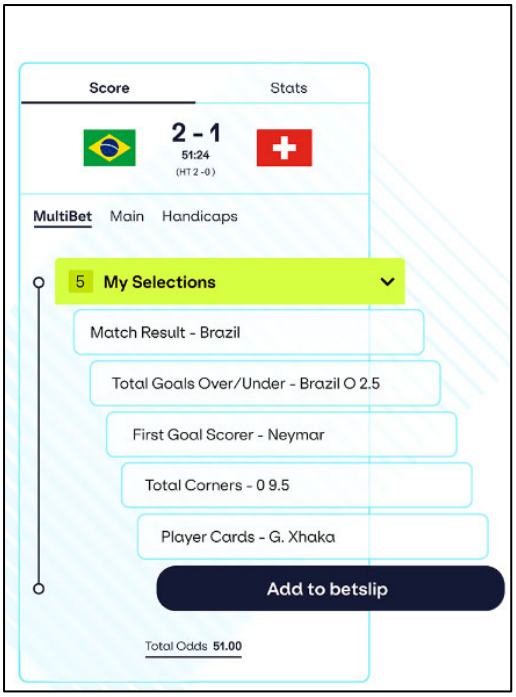
https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

124. As shown in the screenshots below, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.

More in-play profits

In-Play MultiBet is a high-margin live betbuilder product, where revenues mount as users add selections to their betslips.

Players create the exact accumulator they want, during a single game, for example - *Ronaldo to score, Portugal to win, Over 5.5 Corners, Penalty awarded to Portugal.*



(*See,* PANDA_000111 at PANDA_000112-PANDA_000113,

https://geniussports.com/sportsbook/betting-data-odds/in-play-multibet/.)

- Genius Sports to provide sportsbooks with automated, AI-powered live odds enabling bettors to place same-game parlays during live play or game intervals
- The new product will be available for the FIFA World Cup, NFL, English Premier League and thousands of other official Genius events

Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has launched *In-Play MultiBet*, providing sportsbooks with a powerful new tool to engage players and grow revenues in time for the FIFA World Cup 2022 and ongoing NFL season.

Same-game parlay bets, which enable bettors to wager on multiple events occurring within the same game, have become an essential part of every major sportsbook's offering, giving customer's greater control over their bets and enhanced margins for the operators themselves.

Now, through *In-Play MultiBet*, these bespoke bets can be placed once the game has begun, enabling players to place bets after every goal, touchdown and during intervals.

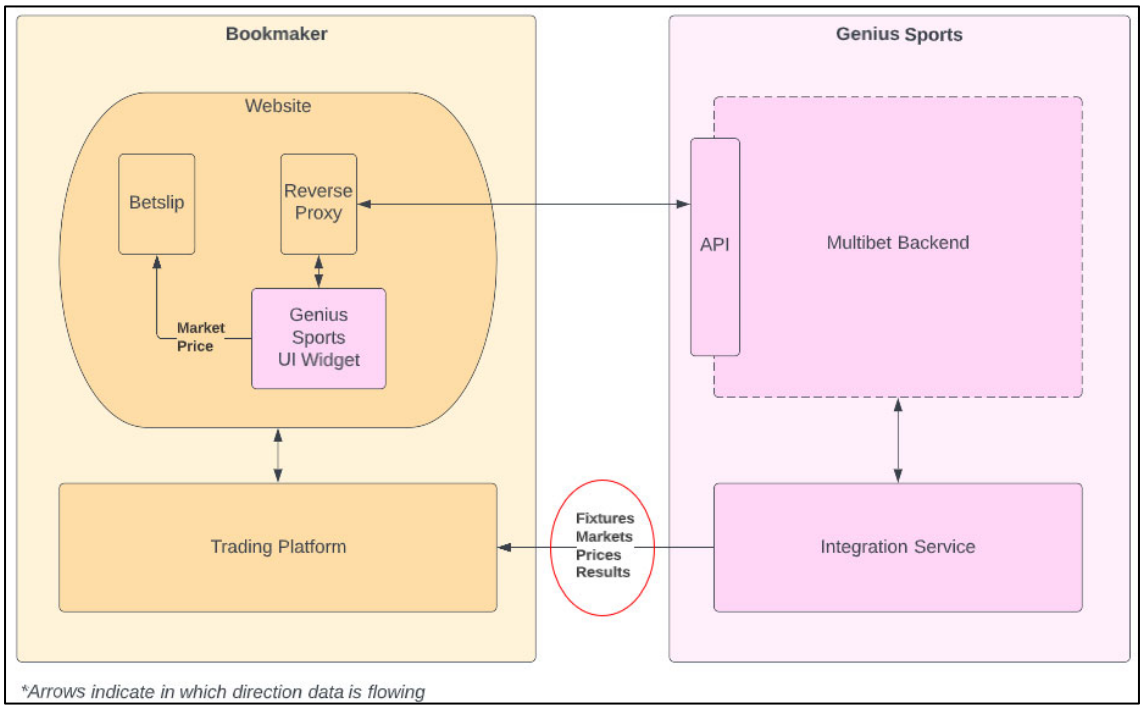
Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

InPlay MultiBet will also be available across the NFL, English Premier League, Liga MX, and dozens of FIBA basketball and FIVB volleyball leagues worldwide.

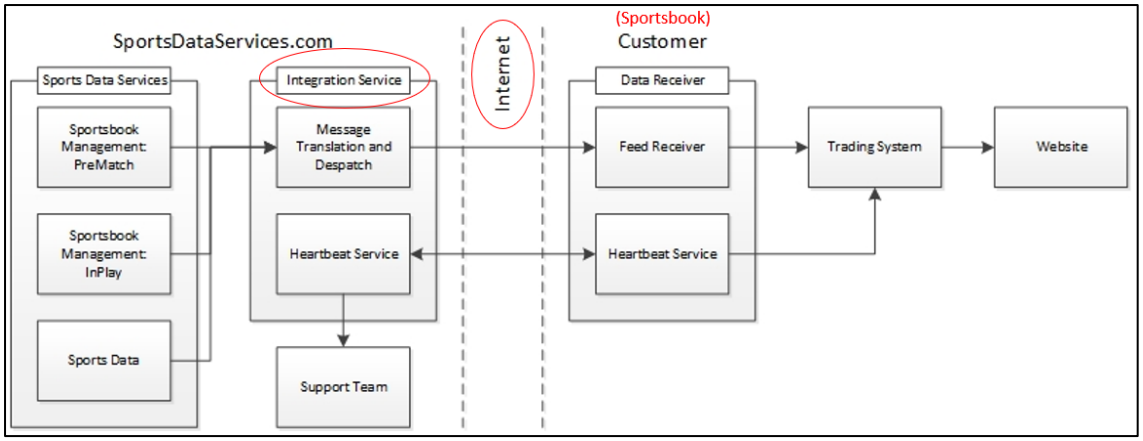
"Combining same game parlays with the unstoppable growth of in-play betting is a breakthrough innovation for us and our partners," said **Jack Davison, Chief Commercial Officer of Genius Sports**. "Starting with the biggest sports event of the year, the FIFA World Cup, *InPlay MultiBet* will enable our partners to unlock bigger margins and drive engagement between key match events and breaks."

(*See,* PANDA_000179-PANDA_000180, https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/.)

125. During operation, Genius Sport's Integration Service (provided by Sportsbook Integration (V3)) transmits various data (fixtures, markets, prices, results) to the sportsbook's trading platform via an Internet connection. Additionally, the Integration Service transmits a message to create a market (bet) in the sportsbook's trading platform. In return, the generated bet is transmitted from the trading platform to the Integration Service. In this manner, the sportsbook and Genius Sports services retrieve information germane to the first live sporting event via the Internet.

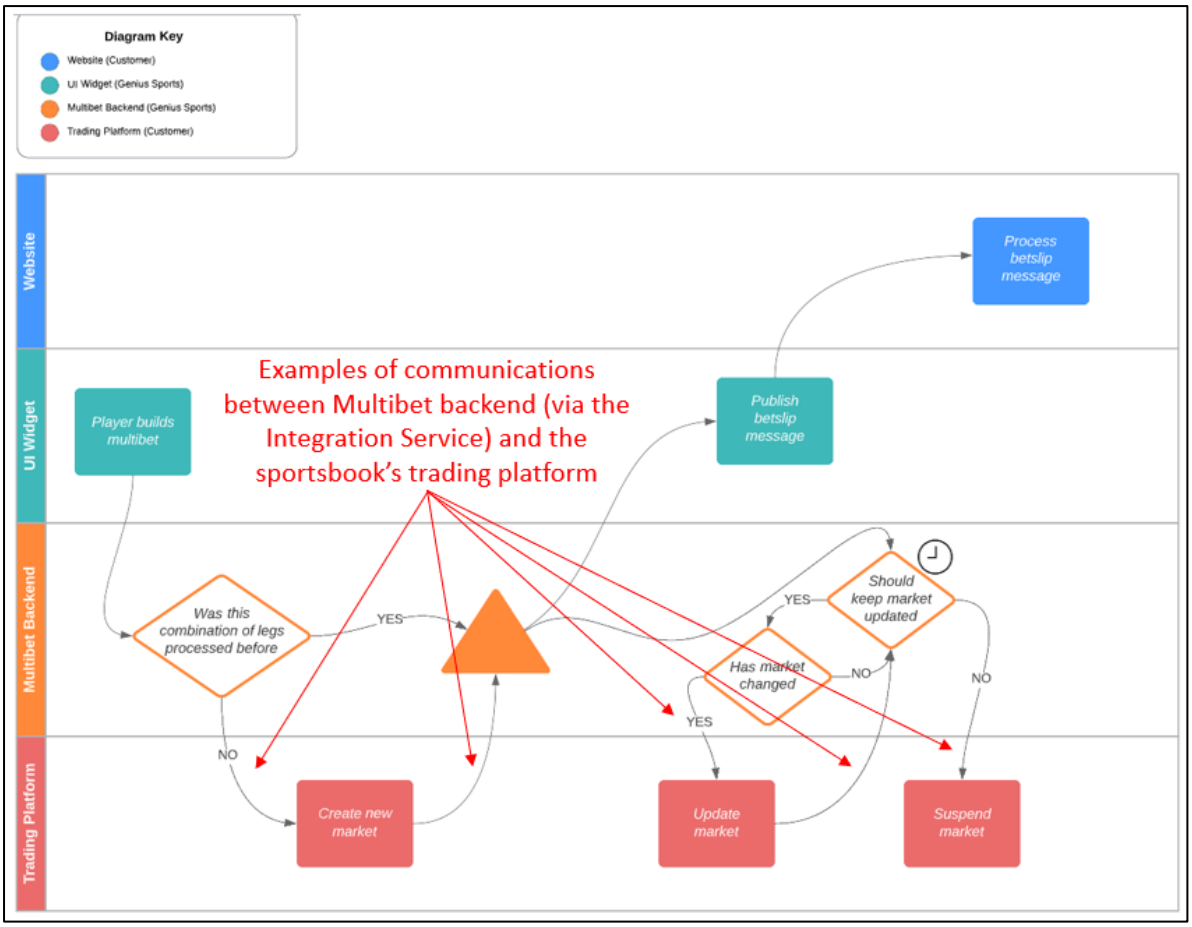


(*See,* PANDA_00212 at PANDA_00213, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664027/Multibet+Back-End+Integration.)



(*See,* PANDA_000539,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/34822492/Integration+Schema.)



(*See,* PANDA_00209 at PANDA_00210,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284187362/Market+Lifetime.)

126. The Multibet widget, when embedded into the Genius Sports' streaming product, is configured for a specific sports match or fixture. The connection between the widget and Genius Sport's back-end is configured to transmit data related to the sports match,.

Embedding a Multibet Widget

How do I embed a Multibet widget under a specific fixture?

The Multibet Widget offered by Genius Sports is fixture specific and does not accommodate an event viewer and selector page, therefore it should be embedded under a specific fixture within the Sportsbook page. Using an URL parameter ***fixtureId*** which is expecting Genius Sports Fixture Id as a value:

https://gsm-widgets.betstream.betgenius.com/multibet?fixtureId=6102728&productName=[clientName]&competitionId=296&culture=es-ES

Other parameters will be required like:

- **Product Name:** this is the customer name given by Genius.
- **Competition id:** is the Genius Sports identifier for a competition.
- **Culture:** is the parameter related to the language preferred.

```
<iframe src="https://gsm-widgets.betstream.betgenius.com/mul
```

(*See,* PANDA_000065,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

Introduction

This API call is to send real time data to the Warehouse/Statistics Engine. It is accomplished by sending a stream of messages over a long running socket. Pending network problems the connection should remain open for the length of the match.

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There are two different ways to establish a publish connection to the system a HTTP method or a RAW method. These two different ways exists to enable the client to potentially work around any port or proxy problems present at in venue areas. Connections can also be sent over one of two different ports, 80 or 5522

The same data, parameters and format is used in both methods, only the startup of the connection differs.

RAW

In the RAW method, a socket is opened to the streaming API endpoint and the request string is sent, followed by two carriage returns (`\n\n`) or two carriage return line feeds (`\r\n\r\n`). To initiate RAW mode the nohttp parameter must be present and set in the request string.

`/v2/{sport}/publish`

Example - HTTP

```
POST /v2/basketball/publish?streamKey=TESTSTREAMKEY&timestamp=1412987153 HTTP/1.1
Host: localhost:8000
Connection: keep-alive
```

Example - RAW

```
/v2/basketball/publish?nohttp=1&streamKey=TESTSTREAMKEY&timestamp=1412987153
```

(S*ee,* PANDA_000139-PANDA_000141, https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

127. The Accused Products include *at least one webserver communicatively coupled to the at least one socket server to transmit, to the first viewer client device, a first Internet address of a first media source to establish a first video Internet communication channel between the first media source and the first viewer client device to carry the first digital content relating to the first sporting event*.

128. For example, Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.

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"Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

> In order to protect client from unauthorized access and malicious traffic within the application to platform, client **must** implement the solution described in detail below. The described workflow will guarantee that only authorized (logged-in) user can access the widget and only through client's website. If the below is implemented, non-logged in users should notbe able to construct betslips within the Multibet widget.
>
> The widget, and all calls to get probabilities/prices should pass through a reverse proxy which ensures that the the person requesting the price or widget is known to the bookmaker.
>
> The "Add-to-Betslip" action is a client side javascript initiated event which the bookmaker website or webview should be listening to. This event is described in more detail further down this document. When the punter adds to the betslip, a call is made through the reverse proxy to create the market in the bookmaker trading platform.
>
> To allow the widget on the web to properly authenticate the exact solution described below needs to be implemented by the bookmaker for their reverse proxy which does authentication.

(*See,* PANDA_000228,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/1277034498/Authenticating+user+session+using+a+proxy+service.)

> 1. Player will access client's website, which hosts an iframe. Iframe would point to the Genius Sports Integration page endpoint **(https://gsm-widgets-uat.betstream.betgenius.com/...).**
> 2. Genius Sports integration Iframe page would point to client's reverse proxy, which in turn forwards the request transparently in the background to Multibet app **(www.customer.com/multibet). NB! Proxy must be located in the root path of the domain.**
> 3. Webserver hosting the Multibet widget will be IP whitelisted to allow traffic only from customer's reverse proxy.
> 4. Multibet widget is then executed/rendered in player's device/browser.
> 5. Backend calls within the widget will be passing through client's proxy. Each call will be using relative paths.
> 6. If player creates a betslip ("Add-to-BetSlip") then the associated back-end call (V1: "addorupdatebetslip", V2: "savebetslip") will be intercepted to check if the user session is logged.

(*See,* PANDA_000228-PANDA_000229,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/1277034498/Authenticating+user+session+using+a+proxy+service.)

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```
POST /v2/basketball/publish?streamKey=TESTSTREAMKEY&timestamp=1412987153 HTTP/1.1
Host: localhost:8000
Connection: keep-alive
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Example - RAW

```
/v2/basketball/publish?nohttp=1&streamKey=TESTSTREAMKEY&timestamp=1412987153
```

(S*ee,* PANDA_000139-PANDA_000141, https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

129. Genius Sports also offers two options for sportsbooks to receive its live video stream offerings: (1) a Drop & Play video player developed in-house by Genius Sports that can be embedded in a sportsbook's webpage, and (2) a video API that can facilitate access to Genius Sport's live streams using a sportsbook's own video player. Both options result in a copy of a video stream being provided to a client device, as claimed. Authentication data (e.g., a URL, token, DRM) is transmitted to the client device, which is passed to a video player on the client

device (e.g., the video player embedded in a sportsbook's website). The video player then requests and receives a copy of the video stream from an appropriate CDN using the authentication data.

130. Option (1): Drop & Play: For this option, Genius Sports provides a video player widget that can be integrated by a sportsbook into its website. When a user/viewer requests a video stream while using the sportsbook's website, the back-end of the sportsbook's website transmits a query to Genius Sport's video API to retrieve authentication data related to the selected video stream. When the sportsbook's website retrieves this information, the authentication data is passed along to the video player, which in turn transmits a request from a CDN to retrieve the video stream. In this manner, a copy of the video stream is provided to the video player on the viewer client device via a communication channel between the CDN and the viewer client device. This process is depicted below.

Insert a script tag defining the desired fixture and the bookmaker source:

```
<script
  src="https://genius-live-player-production.betstream.betgenius.com/widgetLoader?customerId=YOUR_CUSTOMER_ID&fixtureId=YOUR_FIXTURE_ID">
</script>
```

Insert an element with defined id to attach the video player to it, should be the exact same one used as the script **containerId** parameter

```
<div id="YOUR_CONTAINER_ID" /> <!-- Defaults to geniusLive if a containerId is not set -->
```

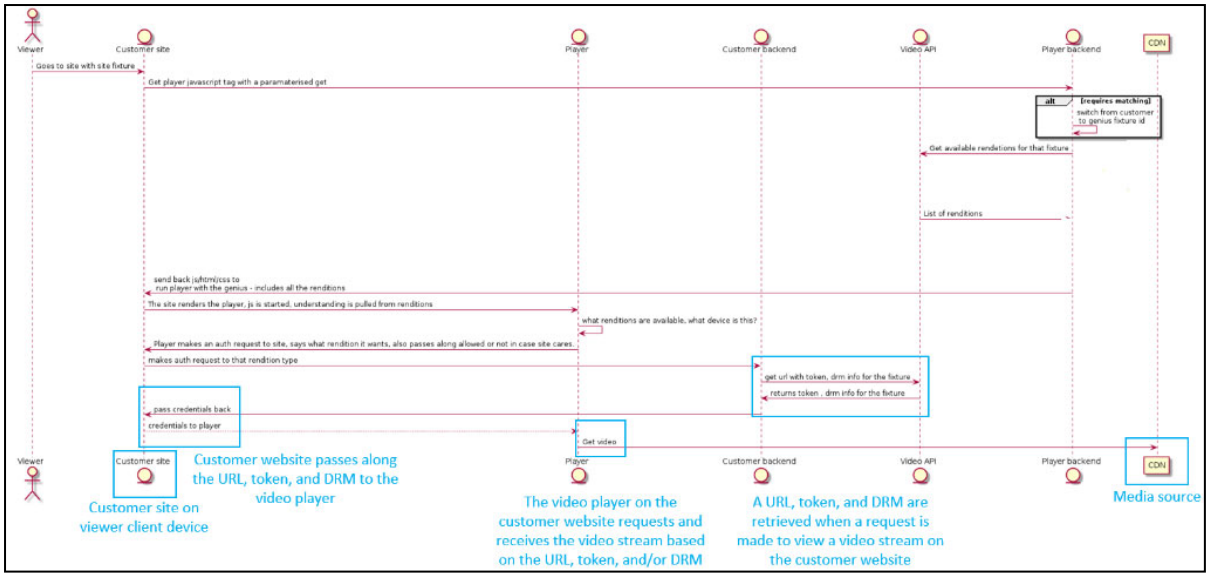
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

You embed a script tag in your site with the querystring parameters you are interested in passing to the player. Our player looks at the stream types available for the specific fixture you are trying to display and picks the most appropriate stream for your viewers device. Our script will then raise an event out to the containing window, with the necessary information to make a call to our API from your backend.

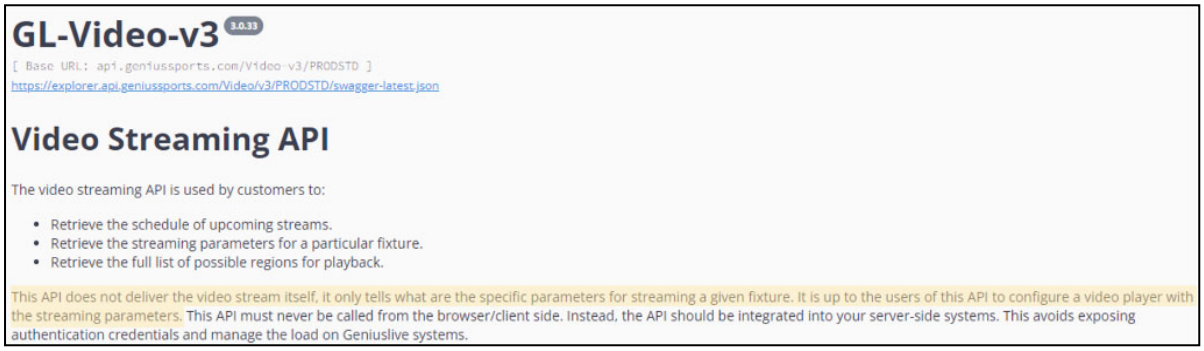
Our API should never be called from the browser directly.

The call to our backend, which is per fixture viewer session, retrieves a url, a token and any DRM information which you may need to play the fixture. You hand the response straight back to our player and it will play the fixture. Sensible HTTP error codes will be returned from our API around the status of the fixture and whether you have booked it.



(*See,* PANDA_000541, PANDA_000550, https://dap-docs.betstream.betgenius.com/how-to-integrate.)

131. Option (2): Video API: For this option, the back-end of the sportsbook's website first requests and retrieve authentication data (e.g., a URL, a token, and/or DRM) related to the selected video stream and then passes this information along to a video player to request and retrieve the video stream. The sportsbook provides its own video player, which is configured to use CDN token authentication. A copy of the video stream is provided to the sportsbook's own video player on the viewer client device via a communication channel between the CDN and the viewer client device. This process is depicted below.



GL-Video-v3 3.0.33

[Base URL: api.geniussports.com/Video-v3/PRODSTD]
https://explorer.api.geniussports.com/Video/v3/PRODSTD/swagger-latest.json

Video Streaming API

The video streaming API is used by customers to:

- Retrieve the schedule of upcoming streams.
- Retrieve the streaming parameters for a particular fixture.
- Retrieve the full list of possible regions for playback.

This API does not deliver the video stream itself, it only tells what are the specific parameters for streaming a given fixture. It is up to the users of this API to configure a video player with the streaming parameters. This API must never be called from the browser/client side. Instead, the API should be integrated into your server-side systems. This avoids exposing authentication credentials and manage the load on Geniuslive systems.

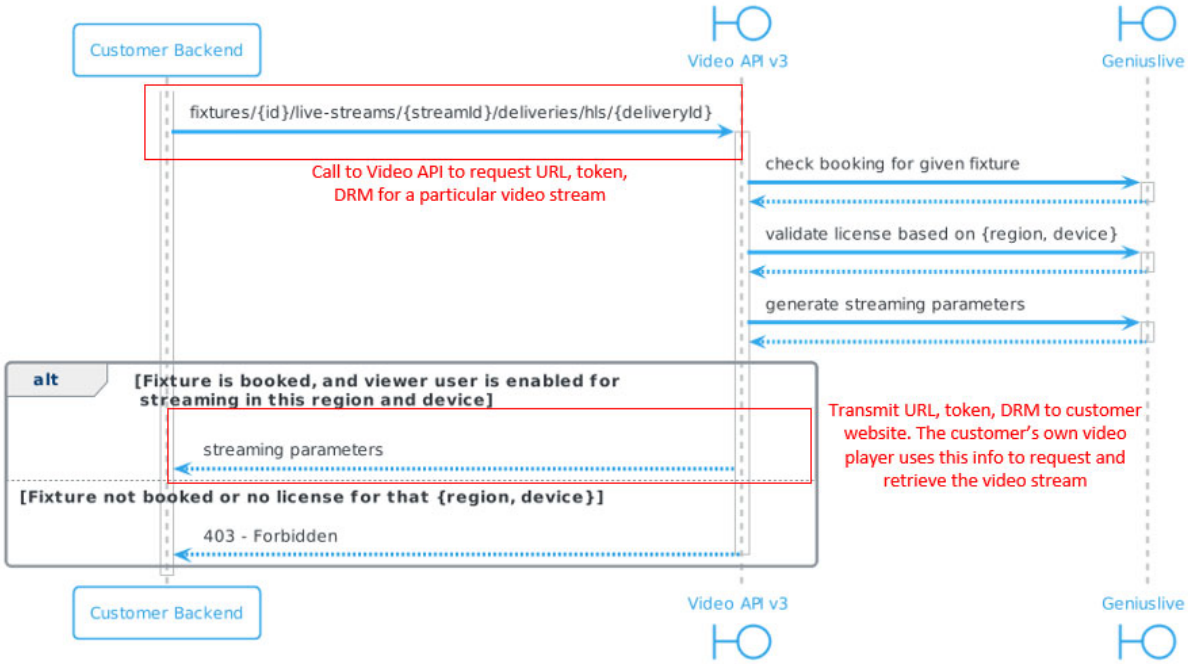
Player integration

You will need to add the necessary logic in your web site to call your backend to retrieve the schedule and the streaming parameters described before. Also, you will need to integrate a player in your site that can apply CDN token authentication. For specific competitions your player will also have to decrypt content using DRM.

Playing the content

Once you have retrieved the schedule and you have selected a fixture to watch, your site should do the following per viewer:

1. Geo-locate the viewer to know the region where the playback is requested
2. Validate if the viewer meets at least one of the permissions required by the selected live stream
3. Select the appropriate delivery to play from the selected live stream. You might need to check the client's platform to choose between HLS or DASh deliveries.
4. Call your backend to get the streaming parameters from the Video API.
5. Play the content using CDN token authentication (and DRM for specific competitions)



(S*ee,* PANDA_00217, PANDA_00222, https://swaggerui.api.geniussports.com/?url=https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json.)

132. Genius Sports' streaming product includes at least on webserver to transmit *a first socket address of the first event socket to establish the first event information Internet communication channel to carry the online gaming information.* For example, Genius Sports' streaming product practices a system/method for providing a requested video stream to a viewer via a port . The RAW method is used to send from the API the port number from where the stream is to be received. The request from the user can have multiple return line feeds which return the video feed to the client device form the assigned port/socket via the internet.

133. Genius Sports' streaming product combines live sports data and live sports video.

New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.

Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.

Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.

By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.

All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.

International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.

Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.

"Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

Insert a script tag defining the desired fixture and the bookmaker source:

```
1 <script
2   src="https://genius-live-player-production.betstream.betgenius.com/widgetLoader?
  customerId=YOUR_CUSTOMER_ID&fixtureId=YOUR_FIXTURE_ID">
3 </script>
```

Insert an element with defined id to attach the video player to it, should be the exact same one used as the script **containerId** parameter

```
1 <div id="YOUR_CONTAINER_ID" /> <!-- Defaults to geniusLive if a containerId is not set -->
```

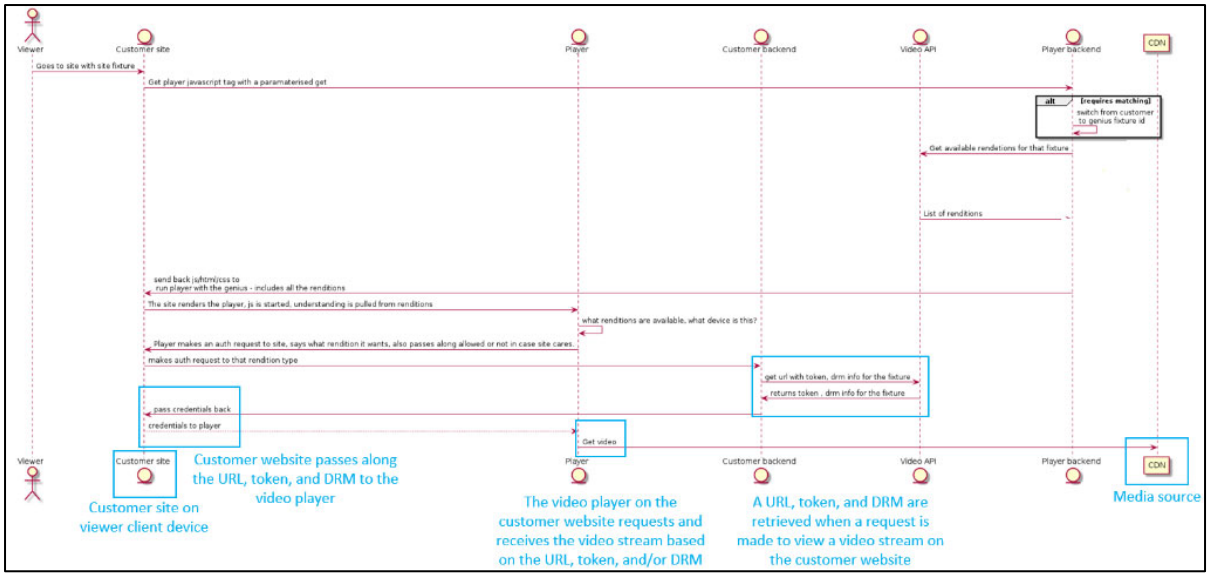
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

You embed a script tag in your site with the querystring parameters you are interested in passing to the player. Our player looks at the stream types available for the specific fixture you are trying to display and picks the most appropriate stream for your viewers device. Our script will then raise an event out to the containing window, with the necessary information to make a call to our API from your backend.

Our API should never be called from the browser directly.

The call to our backend, which is per fixture viewer session, retrieves a url, a token and any DRM information which you may need to play the fixture. You hand the response straight back to our player and it will play the fixture. Sensible HTTP error codes will be returned from our API around the status of the fixture and whether you have booked it.



(*See,* PANDA_000541, PANDA_000550, https://dap-docs.betstream.betgenius.com/how-to-integrate.)

Introduction

This API call is to send real time data to the Warehouse/Statistics Engine. It is accomplished by sending a stream of messages over a long running socket. Pending network problems the connection should remain open for the length of the match.

Connection

There are two different ways to establish a publish connection to the system a HTTP method or a RAW method. These two different ways exists to enable the client to potentially work around any port or proxy problems present at in venue areas. Connections can also be sent over one of two different ports, 80 or 5522

The same data, parameters and format is used in both methods, only the startup of the connection differs.

RAW

In the RAW method, a socket is opened to the streaming API endpoint and the request string is sent, followed by two carriage returns (`\n\n`) or two carriage return line feeds (`\r\n\r\n`). To initiate RAW mode the nohttp parameter must be present and set in the request string.

```
/v2/{sport}/publish
```

Example - HTTP

```
POST /v2/basketball/publish?streamKey=TESTSTREAMKEY&timestamp=1412987153 HTTP/1.1
Host: localhost:8000
Connection: keep-alive
```

Example - RAW

```
/v2/basketball/publish?nohttp=1&streamKey=TESTSTREAMKEY&timestamp=1412987153
```

(*See,* PANDA_000139-PANDA_000141,

https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

134. Genius Sports product includes *at least one webserver [that] transmits, to a second viewer client device of the plurality of viewer client devices, the first socket address of the first event socket to establish a second event information Internet communication channel between the first event socket and the second viewer client device*. For example, Genius Sports' streaming product sends "a stream of messages over a long running socket" to accomplish the "API call to send real time data to the Warehouse/Statistics Engine."

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This API call is to send real time data to the Warehouse/Statistics Engine. It is accomplished by sending a stream of messages over a long running socket. Pending network problems the connection should remain open for the length of the match.

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Host: localhost:8000
Connection: keep-alive
```

Example - RAW

```
/v2/basketball/publish?nohttp=1&streamKey=TESTSTREAMKEY&timestamp=1412987153
```

(*See,* PANDA_000139-PANDA_000141,

https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

135. Genius Sports product includes *at least one socket server [that] transmits at least some of the first event information, including the online gaming information germane to the first*

sporting event, to the second viewer client device via the second event information Internet communication channel, such that the online gaming information is shared in a synchronized manner by the first viewer client device and the second viewer client device. For example, in Genius Sports' streaming product, "data is synchronized with Genius' data distribution network, ensuring low latency, accurate, reliable delivery of play-by-play data."

Fail-safe data and video capture

Genius' in-venue data collection systems are designed to continue to function when disconnected from supporting systems, ensuring statisticians can continue to collect rich sports data unimpeded. When disconnected from the internet, these systems will continue to support officials, teams, scoreboards, and broadcasters in the venue. While connected, data is synchronized with Genius' data distribution network, ensuring low latency, accurate, reliable delivery of play-by-play data. The unique sport-specific user interface workflows ensure the most time critical data is delivered at the earliest opportunity while still allowing the collection of a rich dataset.

Supplementing the data solutions, automated cameras allow sports leagues to produce live streaming content for delivery through the distribution network.

Automated monitoring, remote management, and AI-driven production mean minimal interaction is required from sports leagues once the solution has been installed which, alongside Genius' innovative hardware solution, reduces production costs.

(*See,* PANDA_00231 at PANDA_000254, https://www.sec.gov/Archives/edgar/data/1834489/000119312521184911/d196130df1.htm.)

136. Each claim in the '218 Patent recites an independent invention. Neither claims 1 and 4, described above, nor any other individual claim is representative of all claims in the '218 Patent.

137. Defendant has been aware of the '218 Patent since at least the filing of this Complaint. Further, Plaintiff provided affirmative notice of the '218 Patent to Defendant by sending a letter on October 4, 2023, informing Defendant of its infringement of the '218 Patent. Additionally, Plaintiff has met with and had communications with executives at Genius Sports since 2018.

138. Defendant directly infringes at least claims 1 and 4 of the '218 Patent, either literally or under the doctrine of equivalents, by making, using, offering to sell, and selling the systems described above.

139. Defendant's partners, customers, and end users of its Accused Products and corresponding systems and services directly infringe at least claims 1 and 4 of the '218 Patent, literally or under the doctrine of equivalents, at least by using the Accused Products and corresponding systems and services, as described above.

140. Defendant has actively induced and are actively inducing infringement of at least claims 1 and 4 of the '218 Patent with specific intent to induce infringement, and/or willful blindness to the possibility that its acts induce infringement, in violation of 35 U.S.C. § 271(b). For example, Defendant encourages and induces customers to use the Accused Products in a manner that infringes claims 1 and 4 of the '218 Patent at least by offering and providing the software and by engaging in activities relating to selling, marketing, advertising, promotion, installation, support, and distribution of the Accused Products.

141. Defendant encourages, instructs, directs, and/or requires third parties—including its certified partners and/or customers—to use the Accused Products in infringing ways.

142. Defendant further encourages and induces its customers to infringe claims 1 and 4 of the '218 Patent: 1) by widely advertising those services, and providing technical support and instructions to users, and 2) through activities relating to marketing, advertising, promotion, installation, support, and distribution of the Accused Products, including its video streaming software, and services in the United States.

143. Further, as the entity that provides installation, implementation, and integration of the Accused Products in addition to ensuring the Accused Product remains operational for each customer through ongoing technical support, on information and belief, Defendant and/or Defendant's partners affirmatively aid and abet each customer's use of the Accused Products in a manner that infringes the '218 Patent.

144. Defendant also contributes to the infringement of its partners, customers, and end-users of the Accused Products by providing within the United States or importing into the United States the Accused Products, constituting a material part of the inventions claimed, and not a staple article or commodity of commerce suitable for substantial non-infringing uses.

145. Indeed, as shown above, the Accused Products have no substantial non-infringing uses because the accused functionality, including the one-to-many socket architecture and separate channels for video and event information, is an integral part of the Accused Products and must be performed for the Accused Products to perform their intended purpose. These functionalities are continually running when the system is in use and, on information and belief, cannot be removed or disabled (or, if they could, the system would no longer suitably function for its intended purpose). Moreover, for the same reasons, without the system and components identified above that practice the ’218 Patent, that functionality could not be performed.

146. Additionally, the accused functionality, including the one-to-many socket architecture and separate channels for video and event information, itself has no substantial non-infringing uses because the components, modules and methods identified above are a necessary part of that functionality. For example, without the one-to-many socket architecture, the Accused Products could not effectively synchronize the event information across multiple viewers. These functionalities are continually running when the system is in use and cannot be removed or disabled (or, if they could, the system would no longer suitably function for its intended purpose). Moreover, for the same reasons, without the system and components identified above that practice claimed in the ’218 Patent, that functionality could not be performed.

147. In addition, as shown in the detailed analysis above, the products, systems, modules, and methods provided by Defendant constitute a material part of the invention—indeed,

they provide all the components, modules, and features that perform the claimed methods and systems. For example, the Accused Products and accused functionalities (e.g., the one-to-many architecture) constitute a material part of the inventions claimed because such architecture is integral to the system as recited in the claims of the ’218 Patent. None of these products are staple goods—they are sophisticated and customized video-streaming products, methods, and systems.

148. On information and belief, the infringing actions of each partner, customer, and/or end-user of the Accused Products are attributable to Defendant. For example, on information and belief, Defendant directs and controls the activities or actions of its partners or others in connection with the Accused Products by contractual agreement or otherwise requiring partners or others to provide information and instructions to customers who acquire the Accused Products which, when followed, results in infringement. Defendant further directs and controls the operation of devices executing the Accused Products by programming the software which, when executed by a customer or end user, performs the claimed method of at least claims 1 and 4 of the ’218 Patent.

149. Plaintiff has suffered and continues to suffer damages, including lost profits, as a result of Defendant’s infringement of the ’218 Patent. Defendant is therefore liable to Plaintiff under 35 U.S.C. § 284 for damages in an amount that adequately compensates Plaintiff for Defendant’s infringement, but no less than a reasonable royalty.

150. Plaintiff will continue to suffer irreparable harm unless this Court preliminarily and permanently enjoins Defendant, its agents, employees, representatives, and all others acting in concert with Defendant from infringing the ’218 Patent.

151. Defendant’s infringement of the ’218 Patent is knowing and willful. Defendant acquired actual knowledge of the ’218 Patent at least upon the filing of this Complaint. Further,

Plaintiff provided affirmative notice of the ’218 Patent to Defendant by sending a letter on October 4, 2023, informing Defendant of its infringement of the ’218 Patent.

152. On information and belief, despite Defendant’s knowledge of the Asserted Patents and Plaintiff’s patented technologies, Defendant made the deliberate decision to sell products and services that it knew infringe the ’218 Patent. Defendant’s continued infringement of the ’218 Patent with knowledge of the ’218 Patent constitutes willful infringement.

153. Plaintiff’s allegations of direct infringement, indirect infringement, and willful infringement with respect to this patent are further set forth in Exhibit 5.

THIRD CAUSE OF ACTION
(INFRINGEMENT OF THE ’697 PATENT)

154. Plaintiff realleges and incorporates by reference the allegations of the preceding paragraphs of this Complaint.

155. Defendant has infringed and continues to infringe one or more claims of the ’697 Patent in violation of 35 U.S.C. § 271 in this District and elsewhere in the United States and will continue to do so unless enjoined by this Court. The Accused Products, including features of the Genius Sports’ products at least when used for their ordinary and customary purposes, practice each element of at least claims 19 and 20 of the ’697 Patent as demonstrated below.

156. For example, claim 19 of the ’697 Patent recites:

> A system for providing a first plurality of copies of a first broadcaster’s live stream of digital content including first video-based commentary about a first live sporting event from a first broadcaster client device to a first plurality of viewer client devices, and for providing a second plurality of copies of a second broadcaster’s live stream of digital content including second video-based commentary about a second live sporting event from a second broadcaster client device to a second plurality of viewer client devices, the system comprising:
>
> A) a plurality of media sources to:
>
> receive the first broadcaster’s live stream of digital content and the second

broadcaster's live stream of digital content;

provide a first copy of the first plurality of copies to a first viewer client device of the first plurality of viewer client devices via a first Internet communication channel between the plurality of media sources and the first viewer client device of the first plurality of viewer client devices; and

provide a first copy of the second plurality of copies to a first viewer client device of the second plurality of viewer client devices via a second Internet communication channel between the plurality of media sources and the first viewer client device of the second plurality of viewer client devices;

B) a control server to periodically retrieve, via the Internet and from an event information provider, first event information germane to the first live sporting event and second event information germane to the second live sporting event; and

C) at least one socket server communicatively coupled to the control server to:

receive from the control server at least some of the first event information and at least some of the second event information, wherein:

the at least some of the first event information includes first score information for the first sporting event; and

the at least some of the second event information includes second score information for the second sporting event; and

transmit at least the first score information the at least some of the first event information to the first viewer client device of the first plurality of viewer client devices via a third Internet communication channel between at least one first event socket of the at least one socket server and the first viewer client device of the first plurality of viewer devices; and

transmit at least the second score information of the at least some of the second event information to the first viewer client device of the second plurality of viewer client devices via a fourth Internet communication channel between at least one second event socket of the at least one socket server and the first viewer client device of the second plurality of viewer devices.

157. Claim 20 of the '697 Patent, which depends from claim 19, recites:

20. The system of claim 19, wherein:

in A), the plurality of media sources:

provide a second copy of the first plurality of copies to a second viewer

client device of the first plurality of viewer client devices via a third video Internet communication channel between the plurality of media sources and the second viewer client device of the first plurality of viewer client devices; and

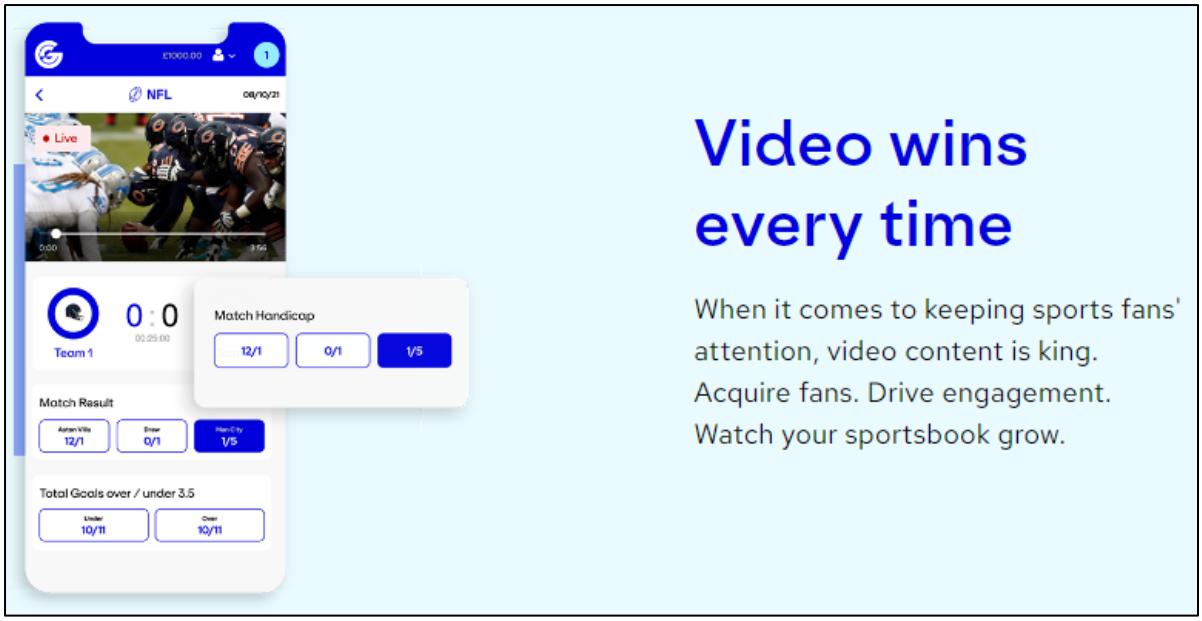
provide a second copy of the second plurality of copies to a second viewer client device of the second plurality of viewer client devices via a fourth video Internet communication channel between the plurality of media sources and the second viewer client device of the second plurality of viewer client devices; and

in C), the at least one socket server:

transmits at least the first score information of the first event information to the second viewer client device of the first plurality of viewer client devices via a third event information Internet communication channel between the at least one first event socket of the at least one socket server and the second viewer client device of the first plurality of viewer devices; and

transmits at least the second score information of the second event information to the second viewer client device of the second plurality of viewer client devices via a fourth event information Internet communication channel between the at least one second event socket of the at least one socket server and the second viewer client device of the second plurality of viewer devices.

158. The Accused Products include each element of claims 19 and 20 of the '697 Patent. To the extent the preamble is construed to be limiting, the Accused Products include *a system for providing a first plurality of copies of a first broadcaster's live stream of digital content including first video-based commentary about a first live sporting event from a first broadcaster client device to a first plurality of viewer client devices, and for providing a second plurality of copies of a second broadcaster's live stream of digital content including second video-based commentary about a second live sporting event from a second broadcaster client device to a second plurality of viewer client devices*. For example, Genius Sports' streaming product includes both a live stream of a sporting event and overlayed event information germane to the sporting event.



(*See,* PANDA_000055 at PANDA_000057, https://www.geniussports.com/sportsbook/streaming/.)

159. The overlaid event information includes Milestones, Leaderboards, Highs, Probabilities, team information (e.g., team names, abbreviations, and/or logos), score information (e.g., with essentially real-time score updates synchronized with the video-based commentary), player information, venue information, game status information (e.g., on-base, at-bat, timeouts, fouls, pole position, yards-to-go, yards-to-goal, down, team statistics, player statistics, historical data, etc.). Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.

Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.

Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.

By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.

All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.

International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.

Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.

"Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

160. Genius Sports delivers "thousands of low latency live streams" from top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has agreed to a major expansion of its long-term partnership with Tipsport, a leading Czech sportsbook operator across retail and online.

Tipsport has agreed to a substantial uplift in the number of annual events covered by Genius Sports' suite of data-driven PreMatch, LiveData and LiveTrading solutions while maintaining full flexibility and control over each element of its sportsbook.

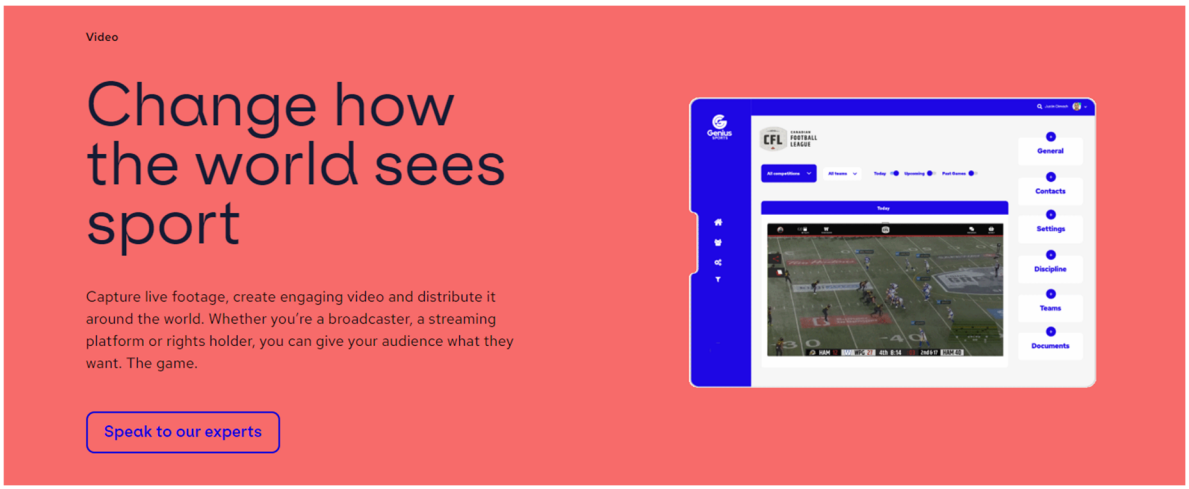
Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipsport will have access to Genius Sports' full NFL product suite, including access to the league's real-time statistics, proprietary Next Gen Stats (NGS) and official sports betting data feed.

Genius Sports will also deliver thousands of low latency streams through its rapidly expanding Streaming solution. Tipsport customers will benefit from an enhanced live betting experience through live streams of top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

(*See,* PANDA_000176-PANDA_000177, https://geniussports.com/newsroom/genius-sports-builds-out-official-data-trading-and-live-streaming-partnership-with-tipsport/.) Genius Sports is also the NFL's official data distributor, providing low-latency video feeds of live sporting events and allowing fans to watch and bet on NFL games. (*See*, PANDA_000555, https://www.espn.com/chalk/story/_/id/38496077/new-platform-betvision-lets-fans-watch-bet-nfl-same-screen.) Genius Sports also delivers live streams of various other sporting events

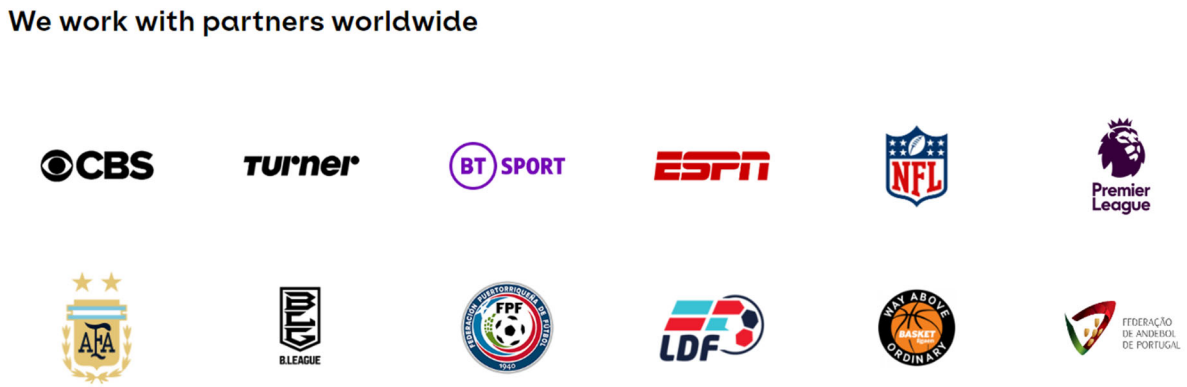
within the United States.

161. Further, the Accused Products are used by Genius Sports and/or in connections with its partners and/or customers, such as broadcasters, to "[c]apture live footage, create engaging video and distribute it around the world" for broadcasters and streaming platform or rights holders:



(*See,* PANDA_000069, https://geniussports.com/video/.)

162. On information and belief, Genius Sports partners with one or more broadcasters to use, offer for sale, and/or sell the Accused Products:



(*See,* PANDA_000069 at PANDA_000074-75, https://geniussports.com/video/.)

We work with the biggest media players in sport

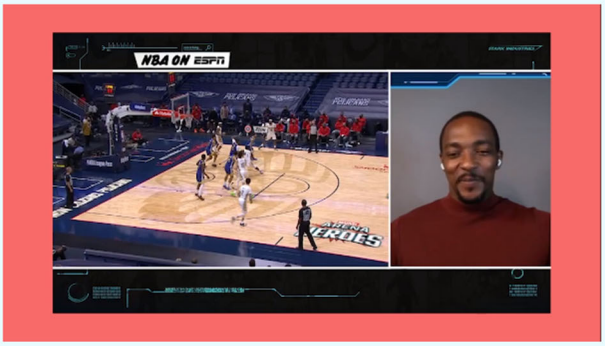
(*See,* PANDA_000021 at PANDA_000025, https://geniussports.com/publishers-broadcasters/.)

163. On information and belief, the Accused Products provide a first and second plurality of copies of a first and second broadcaster's live stream of digital content including first and second video-based commentary about a first and second live sporting event from a first and second broadcaster client device to a first and second plurality of viewer client devices.

Give fans what they care about

People want to know more. How often are the players passing? Who had the most possession?

So track key data about the players, like their speeds and shot velocity. And use that to add graphics and live animations.



(*See,* PANDA_000098 at PANDA_000101, https://geniussports.com/video/production/.)

1

Keep viewers informed

Offer producers and presenters pointers based on pre-match data and analysis, helping them explain the subtle nuances of a coach's strategy.

2

Power visualisations with data

Give your video that extra push. Visualise key moments and statistics in real time with animations and content specific to your viewers.

3

Tell the full story

Dig deeper into every sports story. Producers, editors and fans can create hundreds of stories in minutes through simple web interfaces or embeddable UIs.

(*See,* PANDA_000098 at PANDA_000101-102, https://geniussports.com/video/production/.)

BT Sport augments broadcasts with tracking data

(*See,* PANDA_000004, https://geniussports.com/customer-stories/bt-sport-augments-coverage-with-tracking-data/.)

Team Talk

Personalisation and rich data are pivotal to the future of sports broadcasting.

With fans wanting more control and greater levels of insight than ever before, BT Sport set out to launch a new **Matchday Experience** tool to transform its coverage of the English Premier League (EPL) .

The major UK broadcaster needed a solution that would be:

- Immersive and informative fan experiences
- Editorially relevant with insights that meet fans' demands to better understand games
- Ready for the rollout of 5G and suitable for Premier League fans of all ages

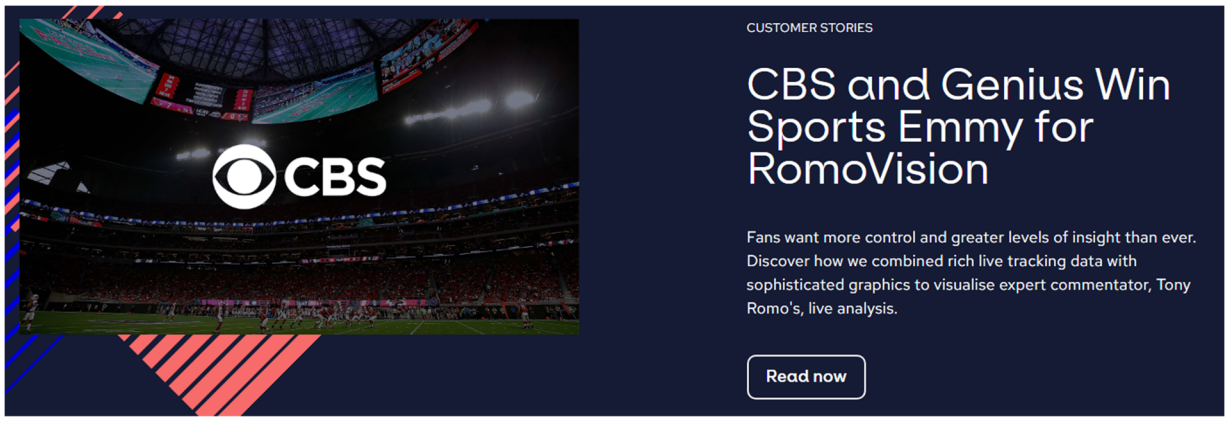
(*See,* PANDA_000004 at PANDA_000005, https://geniussports.com/customer-stories/bt-sport-augments-coverage-with-tracking-data/.)

Bring sports stories to life

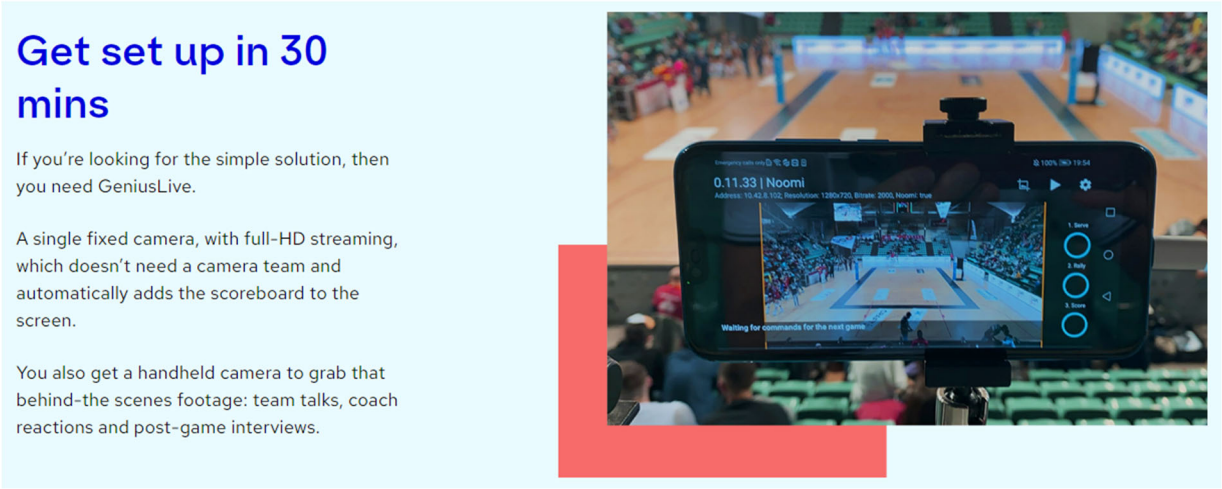
Our optical tracking tech creates augmented, data-driven broadcasts. Adds special effects that change how fans see the game, like:

- Split-second shot probabilities
- Distance to three-pointers
- Real-time player speeds
- Shot velocity
- And much more

(*See,* PANDA_000496, https://geniussports.com/publishers-broadcasters/.)



(*See,* PANDA_000496 at PANDA_000497, https://geniussports.com/publishers-broadcasters/.)



(*See,* PANDA_000084 at PANDA_000088, https://geniussports.com/video/capture/.)

GeniusLive in action:

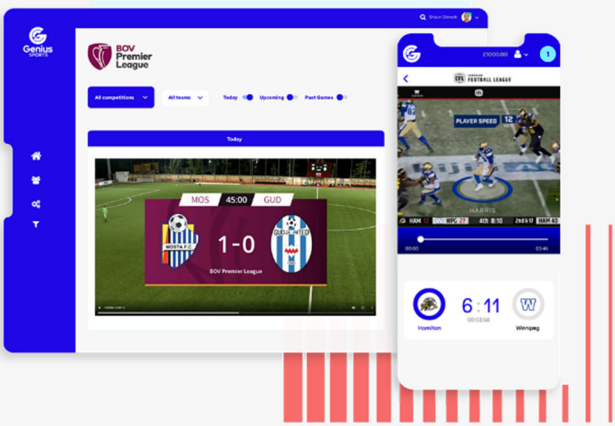
- 1 camera system, fixed in-venue
- Up to full HD video streaming
- Unmanned system films the entire court
- Installation within 30 minutes
- Graphic overlay (scoreboard)
- Additional handheld camera to take over video and audio
- Integrated with real-time fan engagement tools

(*See,* PANDA_000084 at PANDA_000089, https://geniussports.com/video/capture/.)

Broadcast the full picture

Need that extra touch? GeniusLive+ gives you everything you need. Create streams that rival TV. Add graphic overlays and post-match highlights.

Capture the entire pitch, with a 180° panoramic camera. And even throw in live commentary and extra cameras from around the venue. All automatically.



(*See,* PANDA_000084 at PANDA_000090, https://geniussports.com/video/capture/.)

GeniusLive+ in action:

- Live and on-demand video in full HD
- Fully-automated production for every game and training session at the venue
- Full-pitch panoramic view through our unique camera head that captures 180° in high resolution
- Automated on-screen graphics and post-match highlights
- Enhanced production with additional cameras located around the venue and live commentary

(*See,* PANDA_000084 at PANDA_000091, https://geniussports.com/video/capture/.)

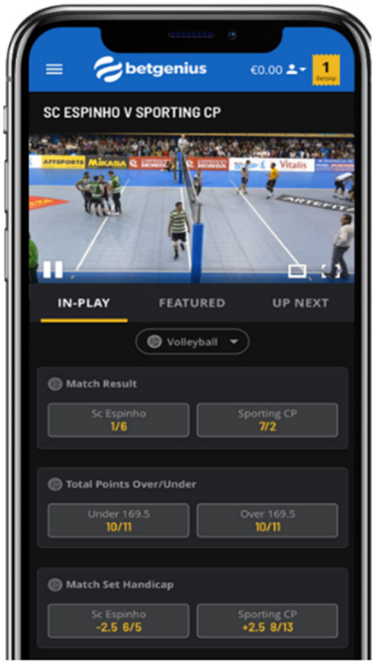
The NFL appointed Genius Sports in April 2021 as its exclusive worldwide distributor of real-time official play-by-play statistics, proprietary Next Gen Stats (NGS) data, and the League's official sports betting data feed to media companies and sportsbooks in regulated markets. This partnership included the rights for Genius Sports to distribute low latency video feeds to sportsbooks in key international markets, which has now been expanded to include the U.S.

As a first of its kind in the U.S., Caesars Sportsbook will offer official data-driven in-game betting opportunities and player props alongside live video streams of NFL games to give their customers access to the most compelling in-play NFL betting experience available for mobile and tablets. In addition, Caesars Sportsbook will utilize official NFL league and team marks and logos to help promote their live premium content through a fully immersive Watch & Bet live wagering experience.

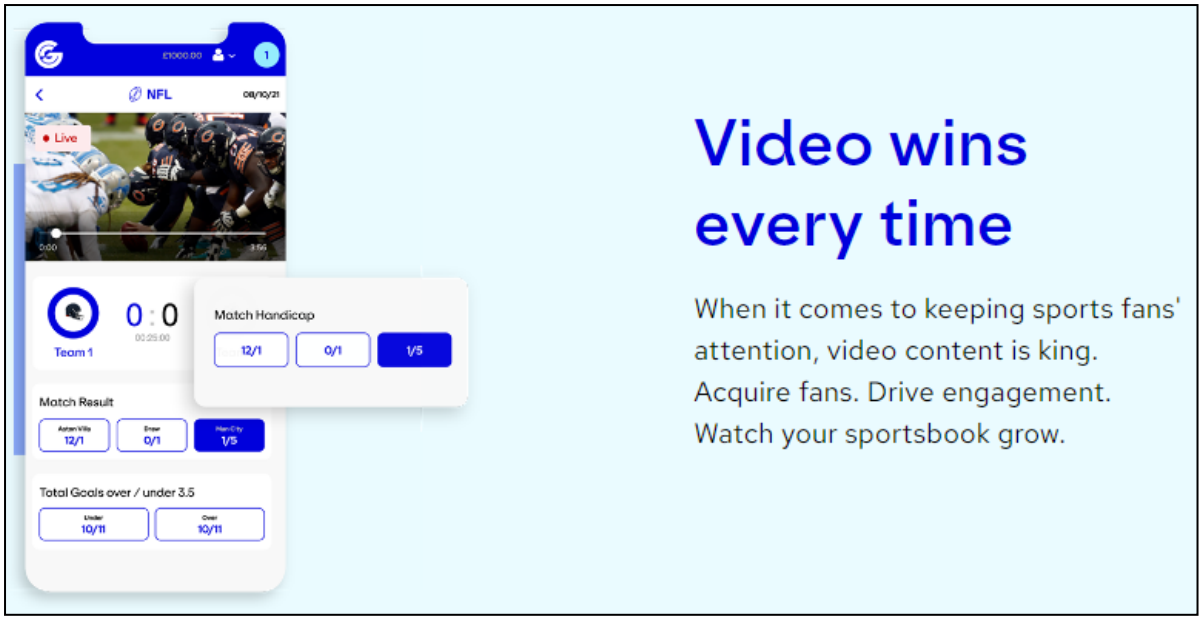
(*See,* PANDA_000066 at PANDA_000067, https://www.geniussports.com/newsroom/genius-sports-expands-partnership-with-nfl-to-provide-watch-bet-video-streams-for-the-2022-season-

starting-with-caesars-entertainment/.)

164. The Accused Products *a plurality of media sources to receive the first broadcaster's live stream of digital content and the second broadcaster's live stream of digital content*. For example, Genius Sports maintains an expansive portfolio of live sporting event video feeds, as mentioned above, and the Accused Products utilize a plurality of media sources to receive the broadcasters' live streams of digital content.



(S*ee,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)



(*See,* PANDA_000055 at PANDA_000057, https://www.geniussports.com/sportsbook/streaming/.)

165. The Accused Products includes a plurality of media sources to *provide a first copy of the first plurality of copies to a first viewer client device of the first plurality of viewer client devices via a first Internet communication channel between the plurality of media sources and the first viewer client device of the first plurality of viewer client devices and provide a first copy of the second plurality of copies to a first viewer client device of the second plurality of viewer client devices via a second video Internet communication channel between the plurality of media sources and the first viewer client device of the second plurality of viewer client devices.*

166. For example, Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.

Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.

Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.

By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.

All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.

International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.

Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.

"Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(S*ee,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

167. Genius Sports offers two options for sportsbooks to receive its live video stream offerings: (1) a Drop & Play video player developed in-house by Genius Sports that can be embedded in a sportsbook's webpage, and (2) a video API that can facilitate access to Genius Sport's live streams using a sportsbook's own video player. Both options result in a copy of a video stream being provided to a client device. Authentication data (e.g., a URL, token, DRM) is transmitted to the client device and is passed to a video player on the client device (e.g., the video player embedded in a sportsbook's website). The video player then requests and receives a copy of the video stream from an appropriate CDN using the authentication data.

168. Option (1): Drop & Play: For this option, Genius Sports provides a video player widget that can be integrated by a sportsbook into its website. When a user/viewer requests a video stream while using the sportsbook's website, the back-end of the sportsbook's website transmits a query to Genius Sport's video API to retrieve authentication data related to the selected video stream. When the sportsbook's website retrieves this information, the authentication data is passed along to the video player, which in turn transmits a request from a CDN to retrieve the video stream. In this manner, a copy of the video stream is provided to the

video player on the viewer client device via a communication channel between the CDN and the viewer client device. This process is depicted below.

Insert a script tag defining the desired fixture and the bookmaker source:

```
1 <script
2   src="https://genius-live-player-production.betstream.betgenius.com/widgetLoader?
  customerId=YOUR_CUSTOMER_ID&fixtureId=YOUR_FIXTURE_ID">
3 </script>
```

Insert an element with defined id to attach the video player to it, should be the exact same one used as the script **containerId** parameter

```
1 <div id="YOUR_CONTAINER_ID" /> <!-- Defaults to geniusLive if a containerId is not set -->
```

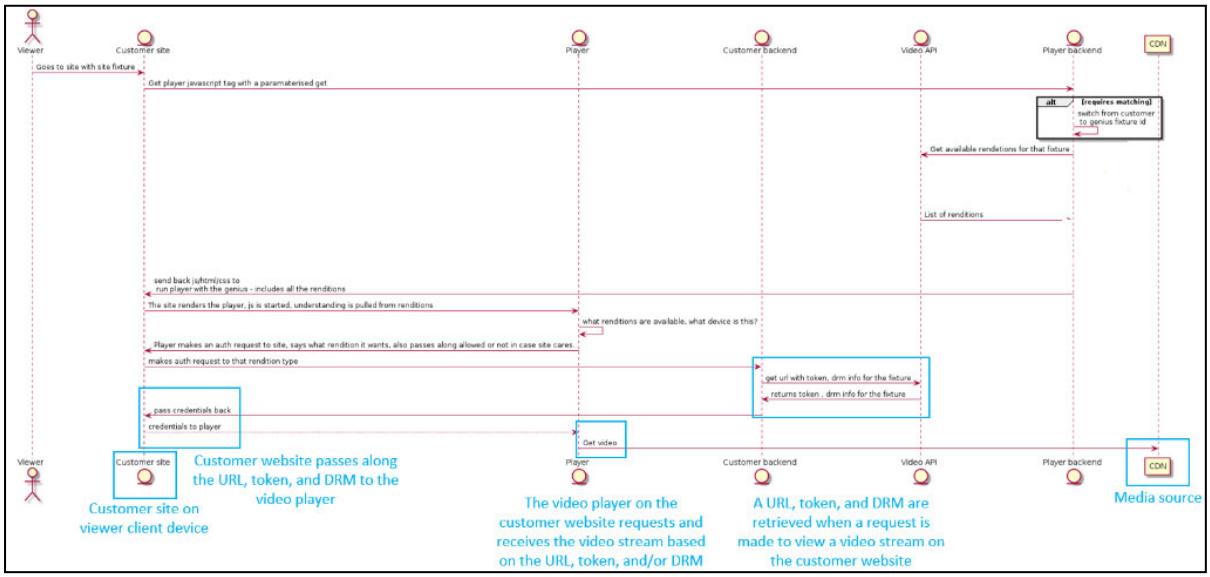
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

You embed a script tag in your site with the querystring parameters you are interested in passing to the player. Our player looks at the stream types available for the specific fixture you are trying to display and picks the most appropriate stream for your viewers device. Our script will then raise an event out to the containing window, with the necessary information to make a call to our API from your backend.

Our API should never be called from the browser directly.

The call to our backend, which is per fixture viewer session, retrieves a url, a token and any DRM information which you may need to play the fixture. You hand the response straight back to our player and it will play the fixture. Sensible HTTP error codes will be returned from our API around the status of the fixture and whether you have booked it.



(*See,* PANDA_000541, PANDA_000550, https://dap-docs.betstream.betgenius.com/how-to-integrate.)

169. Option (2): Video API: For this option, the back-end of the sportsbook's website first requests and retrieve authentication data (e.g., a URL, a token, and/or DRM) related to the selected video stream and then passes this information along to a video player to request and retrieve the video stream. The sportsbook provides its own video player, which is configured to use CDN token authentication. A copy of the video stream is provided to the sportsbook's own video player on the client device via a communication channel between the CDN and the client device. This process is depicted below.

GL-Video-v3 3.0.33

[Base URL: api.geniussports.com/Video-v3/PRODSTD]
https://explorer.api.geniussports.com/Video/v3/PRODSTD/swagger-latest.json

Video Streaming API

The video streaming API is used by customers to:

- Retrieve the schedule of upcoming streams.
- Retrieve the streaming parameters for a particular fixture.
- Retrieve the full list of possible regions for playback.

This API does not deliver the video stream itself, it only tells what are the specific parameters for streaming a given fixture. It is up to the users of this API to configure a video player with the streaming parameters. This API must never be called from the browser/client side. Instead, the API should be integrated into your server-side systems. This avoids exposing authentication credentials and manage the load on Geniuslive systems.

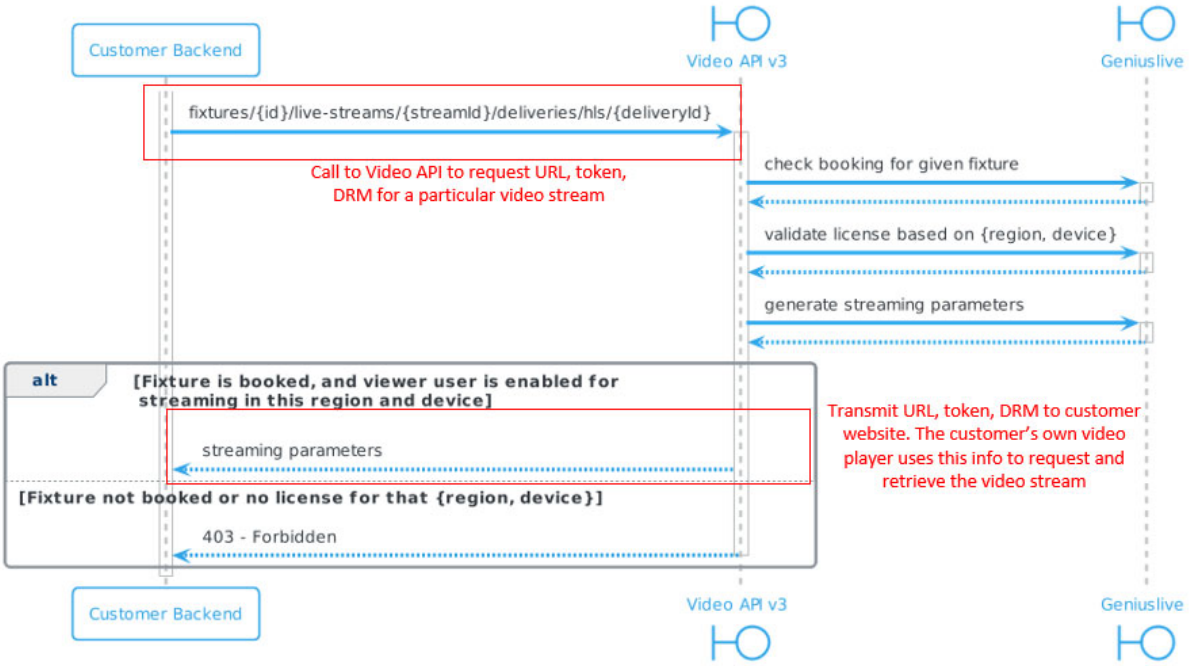
Player integration

You will need to add the necessary logic in your web site to call your backend to retrieve the schedule and the streaming parameters described before. Also, you will need to integrate a player in your site that can apply CDN token authentication. For specific competitions your player will also have to decrypt content using DRM.

Playing the content

Once you have retrieved the schedule and you have selected a fixture to watch, your site should do the following per viewer:

1. Geo-locate the viewer to know the region where the playback is requested
2. Validate if the viewer meets at least one of the permissions required by the selected live stream
3. Select the appropriate delivery to play from the selected live stream. You might need to check the client's platform to choose between HLS or DASh deliveries.
4. Call your backend to get the streaming parameters from the Video API.
5. Play the content using CDN token authentication (and DRM for specific competitions)



(*See*, PANDA_00217, PANDA_00222, https://swaggerui.api.geniussports.com/?url=https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json.)

170. Genius Sports' streaming product includes *a control server to periodically retrieve, via the Internet and from an event information provider, first event information germane to the first live sporting event and second event information germane to the second live sporting event*. For example, Genius Sports' streaming product provides fixture information, such as "Sport, Start (local time of user), Competition, Fixture, FixtureId, Coverage, Lineups, and Assigned", as well as "Statistics."

Schedule

This is where you select the booked fixtures for viewing.

For each fixture, you will see the following information:

- **Sport** - the sport of the fixture
- **Start (local time of user)** - the start time of the match, in *your* time zone (based on your device's current time).
- **Competition** - the league or tournament to which this match belongs.
- **Fixture** - the teams or competitors in this match.
- **FixtureId** - unique id per fixture per sport
- **Coverage** - indicates whether the event is covered from the Venue or TV
- **Lineups** - indicates whether the event has lineup information or not
- **Assigned** - check this box to add this fixture to your **Live** tab.

The **All Fixtures** tab displays all available fixtures in your selected date range. The **Scheduled Fixtures** tab displays only fixtures that you have selected.

By default, the Schedule displays fixtures with start times from -3 hours to +12 hours from the current time. Use the **Filter** button to expand your selection of fixtures, and to filter by coverage type and lineups availability

⚠ Not all fixtures from the selected Date Range are loaded at once. The user can see the first batch of fixtures and scrolling down will automatically load more fixtures.

(S*ee,* PANDA_000196 at PANDA_000198,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/1511621214/Live+Viewer+-+User+Manual.)

Statistics

Statistics show the number of events of each type in this match, per side.

Clicking the opens Time Based Statistics filter menu.

User can apply only one of the filters from the list, which updates the statistics based on the selected filter. Text with the selected filter is shown in the top right corner of the component

- Last 5 mins
- Last 10 mins
- Last 15 mins
- Between 0 - 15 mins
- Between 15 - 30 mins
- Between 30 - 45 mins
- Between 45 - 60 mins
- Between 60 - 7 5mins
- Between 75- 90 mins
- First Half
- Second Half
- Since last Goal
- Since last Red Card
- Extra-tme

(S*ee,* PANDA_000196 at PANDA_000200-PANDA_000201, https://geniussports.atlassian.net/wiki/spaces/BID/pages/1511621214/Live+Viewer+-+User+Manual.)

171. As described below, Genius Sports delivers dozens of FIBA basketball and FIVB volleyball leagues globally.

Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has agreed to a major expansion of its long-term partnership with Tipsport, a leading Czech sportsbook operator across retail and online.

Tipsport has agreed to a substantial uplift in the number of annual events covered by Genius Sports' suite of data-driven PreMatch, LiveData and LiveTrading solutions while maintaining full flexibility and control over each element of its sportsbook.

Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipsport will have access to Genius Sports' full NFL product suite, including access to the league's real-time statistics, proprietary Next Gen Stats (NGS) and official sports betting data feed.

Genius Sports will also deliver thousands of low latency streams through its rapidly expanding Streaming solution. Tipsport customers will benefit from an enhanced live betting experience through live streams of top tier football leagues across Argentina, Colombia, Iceland and China, as well as dozens of FIBA basketball and FIVB volleyball leagues globally.

(S*ee,* PANDA_000176-PANDA_000177, https://geniussports.com/newsroom/genius-sports-builds-out-official-data-trading-and-live-streaming-partnership-with-tipsport/.)

172. On information and belief, Genius Sports' streaming product includes *at least one socket server communicatively coupled to the control server to receive from the control server at least some of the first event information and at least some of the second event information, wherein the at least some of the first event information includes first score information for the first sporting event; and the at least some of the second event information includes second score information for the second sporting event*." For example, Genius Sports' streaming product sends "a stream of messages over a long running socket" to accomplish the "API call to send real time data to the Warehouse/Statistics Engine."

Introduction

This API call is to send real time data to the Warehouse/Statistics Engine. It is accomplished by sending a stream of messages over a long running socket. Pending network problems the connection should remain open for the length of the match.

Connection

There are two different ways to establish a publish connection to the system a HTTP method or a RAW method. These two different ways exists to enable the client to potentially work around any port or proxy problems present at in venue areas. Connections can also be sent over one of two different ports, 80 or 5522

The same data, parameters and format is used in both methods, only the startup of the connection differs.

RAW

In the RAW method, a socket is opened to the streaming API endpoint and the request string is sent, followed by two carriage returns (`\n\n`) or two carriage return line feeds (`\r\n\r\n`). To initiate RAW mode the nohttp parameter must be present and set in the request string.

`/v2/{sport}/publish`

Example - HTTP

```
POST /v2/basketball/publish?streamKey=TESTSTREAMKEY&timestamp=1412987153 HTTP/1.1
Host: localhost:8000
Connection: keep-alive
```

Example - RAW

```
/v2/basketball/publish?nohttp=1&streamKey=TESTSTREAMKEY&timestamp=1412987153
```

(*See,* PANDA_000139-PANDA_000141, https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

173. In addition, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

Infrastructure teams can "sleep easy" and developers are free to innovate

Genius Sports now relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport. Concerns about latency are gone - with 300+ points of presence across a global edge network, Ably effortlessly maintains sub-65ms latency at global scale. That ensures live data delivery to Genius Sports' customers is always 3-4 seconds ahead of video, which protects the integrity of in-play betting and customer revenues.

Meanwhile, Gary and his team can "sleep easier at night", knowing that business critical data is no longer at the mercy of complex and increasingly unstable on-premises infrastructure; the daily rush to address hardware issues is a thing of the past. In turn, that has eliminated annual hardware costs and freed up around 30 hours per month in RabbitMQ maintenance that Genius Sports' developers and engineers can now refocus on service optimisation and innovation.

Talk to our technical team

Reach out to learn more about Ably and how we can help you easily build scalable and reliable apps with WebSockets.

Live chat unavailable

For all the ways to get in touch with us, visit our contact page.

Try our APIs for free

Our free plan includes:

- ✓ 6M Monthly messages
- ✓ 200 Peak concurrent channels
- ✓ 200 Peak concurrent connections
- ✓ No credit card required

Start with a free account

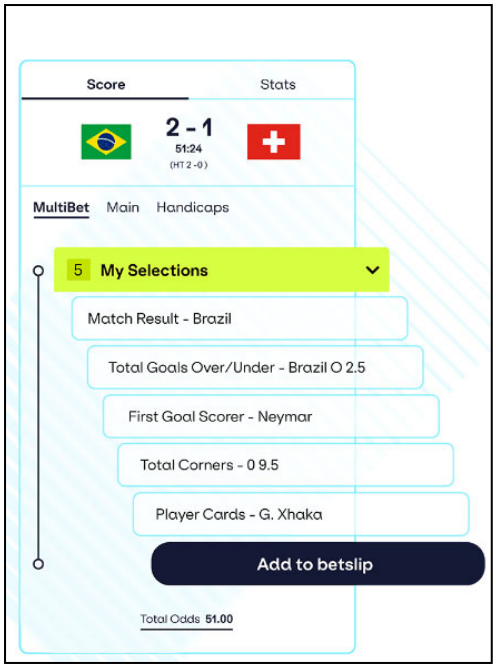
(*See* https://ably.com/case-studies/genius-sports)

174. In addition, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.

More in-play profits

In-Play MultiBet is a high-margin live betbuilder product, where revenues mount as users add selections to their betslips.

Players create the exact accumulator they want, during a single game, for example - *Ronaldo to score, Portugal to win, Over 5.5 Corners, Penalty awarded to Portugal.*



(*See,* PANDA_000111 at PANDA_000112-PANDA_000113,

https://geniussports.com/sportsbook/betting-data-odds/in-play-multibet/.)

- Genius Sports to provide sportsbooks with automated, AI-powered live odds enabling bettors to place same-game parlays during live play or game intervals
- The new product will be available for the FIFA World Cup, NFL, English Premier League and thousands of other official Genius events

Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has launched *In-Play MultiBet*, providing sportsbooks with a powerful new tool to engage players and grow revenues in time for the FIFA World Cup 2022 and ongoing NFL season.

Same-game parlay bets, which enable bettors to wager on multiple events occurring within the same game, have become an essential part of every major sportsbook's offering, giving customer's greater control over their bets and enhanced margins for the operators themselves.

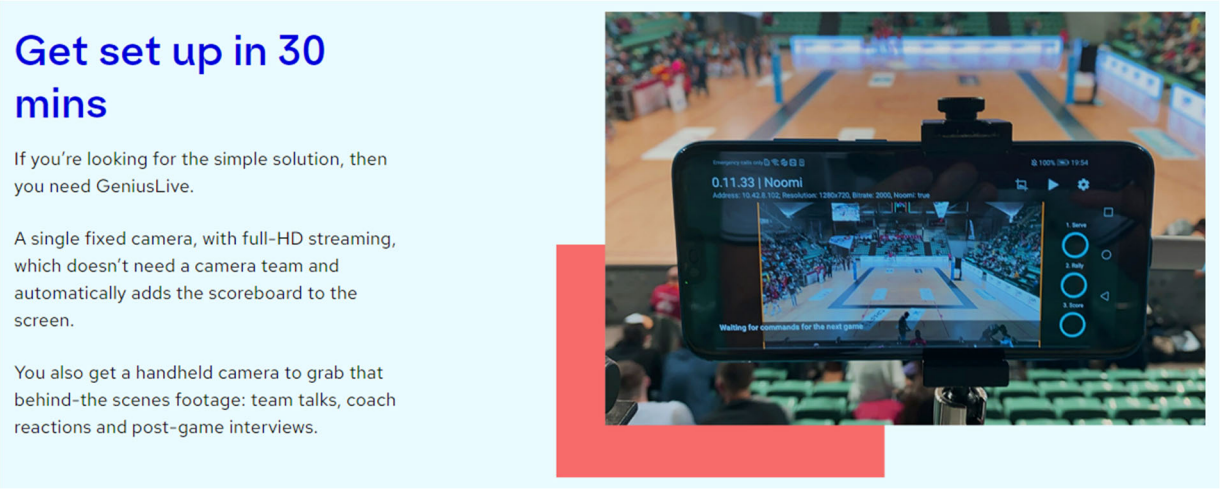
Now, through *In-Play MultiBet*, these bespoke bets can be placed once the game has begun, enabling players to place bets after every goal, touchdown and during intervals.

Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

InPlay MultiBet will also be available across the NFL, English Premier League, Liga MX, and dozens of FIBA basketball and FIVB volleyball leagues worldwide.

"Combining same game parlays with the unstoppable growth of in-play betting is a breakthrough innovation for us and our partners," said **Jack Davison, Chief Commercial Officer of Genius Sports**. "Starting with the biggest sports event of the year, the FIFA World Cup, *InPlay MultiBet* will enable our partners to unlock bigger margins and drive engagement between key match events and breaks."

(*See,* PANDA_000179-PANDA_000180, https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/.)

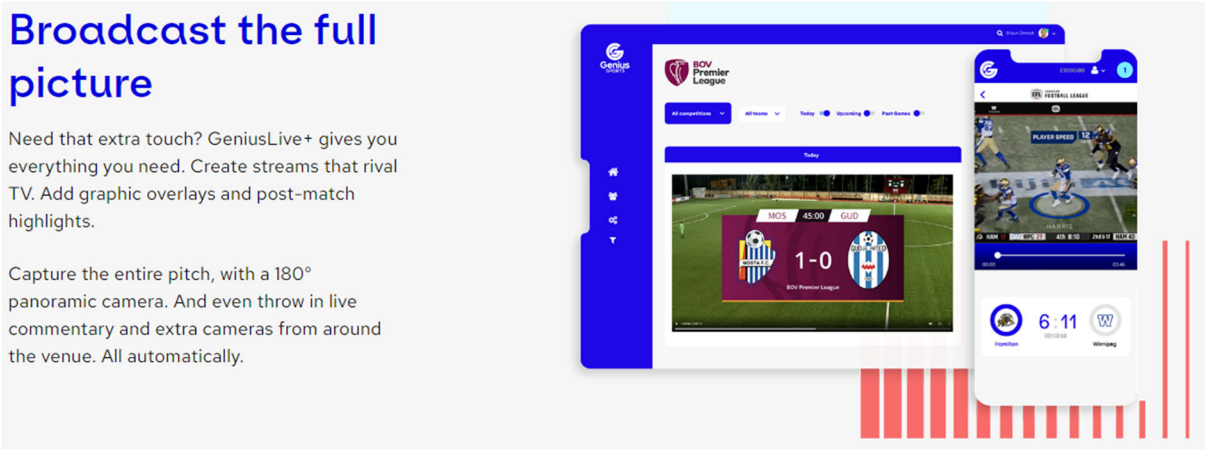


(*See,* PANDA_000084 at PANDA_000088, https://geniussports.com/video/capture/.)

GeniusLive in action:

- 1 camera system, fixed in-venue
- Up to full HD video streaming
- Unmanned system films the entire court
- Installation within 30 minutes
- Graphic overlay (scoreboard)
- Additional handheld camera to take over video and audio
- Integrated with real-time fan engagement tools

(*See,* PANDA_000084 at PANDA_000089, https://geniussports.com/video/capture/.)



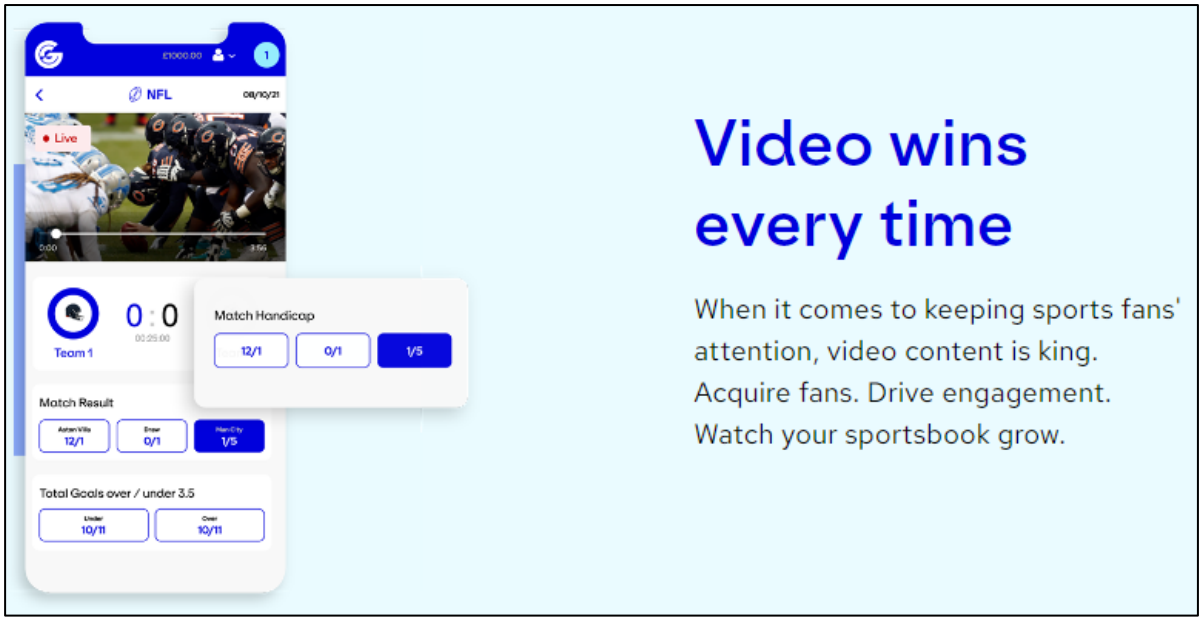
(*See,* PANDA_000084 at PANDA_000090, https://geniussports.com/video/capture/.)

GeniusLive+ in action:

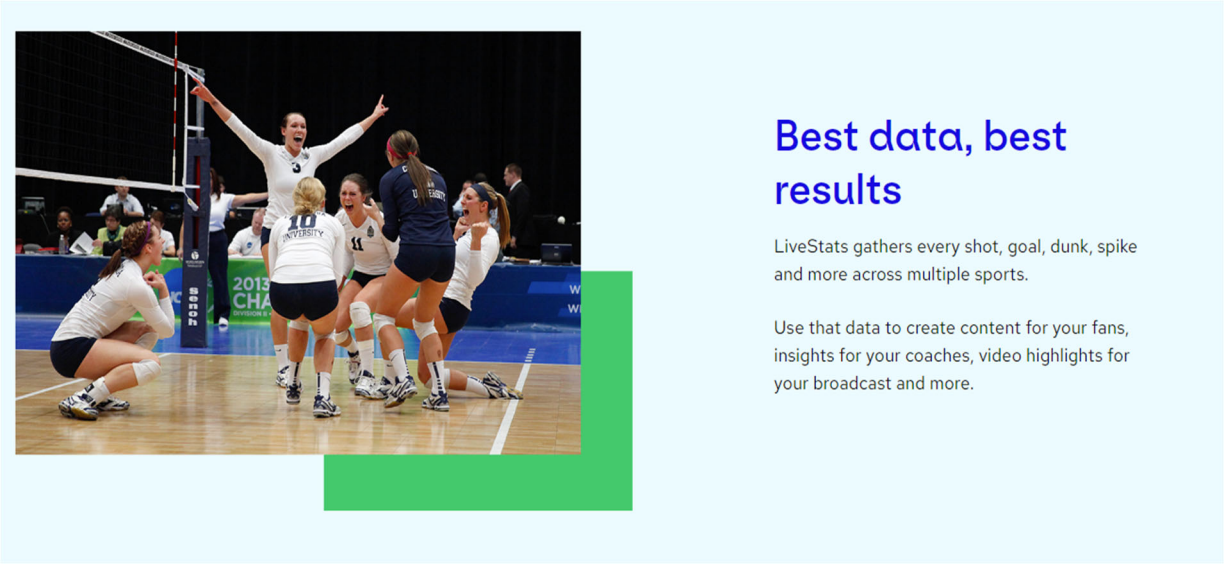
- Live and on-demand video in full HD
- Fully-automated production for every game and training session at the venue
- Full-pitch panoramic view through our unique camera head that captures 180° in high resolution
- Automated on-screen graphics and post-match highlights
- Enhanced production with additional cameras located around the venue and live commentary

(*See,* PANDA_000084 at PANDA_000091, https://geniussports.com/video/capture/.)

175. In another example, the Genius Sports live streaming services provide multiple score and match details, which are updated live on the multibet widgets on a user device.



(*See,* PANDA_000055 at PANDA_000057, https://www.geniussports.com/sportsbook/streaming/.)



(*See,* PANDA_000500 at PANDA_000502, https://geniussports.com/sportstech/data/livestats/.)

176. The Accused Products include a socket server to "*transmit at least the first score information the at least some of the first event information to the first viewer client device of the first plurality of viewer client devices via a third Internet communication channel between at least one first event socket of the at least one socket server and the first viewer client device of the first*

plurality of viewer devices and transmit at least the second score information of the at least some of the second event information to the first viewer client device of the second plurality of viewer client devices via a fourth Internet communication channel between at least one second event socket of the at least one socket server and the first viewer client device of the second plurality of viewer devices." For example, Genius Sports offers a Multibet widget, which can be integrated into the front-end of the sportsbook's platform. An end user using the sportsbook's platform can request a bet via the widget and the widget can thereafter retrieve the data needed to populate the end user's betslip. This data includes, for example, the bet generated by the sportsbook's trading platform, which is transmitted by Genius Sports' back-end (e.g., its Pricing Engine) to the Multibet widget. Although the bets are generated dynamically by the sportsbook's platform, the bets are always stored by Genius Sports for re-use.

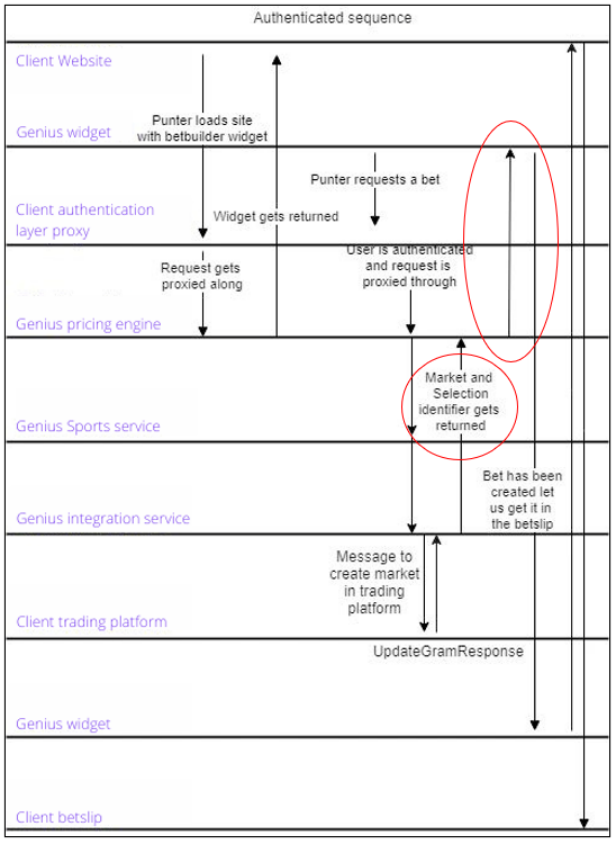
> In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.
>
> It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

(S*ee,* PANDA_000065, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> Please note that latest platform response for each unique Multibet market will be stored on Genius Sports' system in order to be re-used for subsequent bets.

(S*ee,* PANDA_000533 at PANDA_000535, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664043/Multibet+Sportsbook+Integration+V3#Sportsbook-Trading-Platform-Response-to-Multibet-Market-Messages.)

177. The screenshot below confirms that Genius Sports transmits score information to Genius widget on client's device via the Internet.



(*See,* PANDA_000001, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284776797/Authenticating+User-Session+Using+a+Proxy+Service.)

178. Communication between the Multibet widget and Genius Sport's back-end is accomplished using Genius Sport's SmartStream integration. SmartStream products are embedded within a webpage via an iframe.

Multibet Widget Integration

Our customers should embed the Multibet Widget through an iframe. When a player made his choice and requests a bet, the Multibet Widget will make a call to the customer's bet slip with all the required data to populate it with the selection details.

The technical information for the front-end integration can be found in the following space - SmartStream Integrations.

Customers that have already integrated with other Fan Engagement products such as betting widgets, Game Trackers, and Scoreboards can re-use the existing iframe implementation for the Multibet Widget.

(*See,* PANDA_000065,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

This page describes how to integrate with the variety of SmartStream products with examples.

All SmartStream products are hosted by Genius Sports and designed to be embedded within a client hosted webpage via an iframe.

(*See,* PANDA_000077,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

SmartStream Release Process

SmartStream is released to it's user acceptance testing (UAT) environment every two weeks with new features and bug fixes. Release notes will be published at the start of each cycle detailing what features and fixes are to be included in the release.

After two weeks have passed with no critical issues, the version will be pushed to Production where it will be visible on your live site. It is at your discretion that you keep track of these release notes to ensure you are still successfully integrating and that you are satisfied with the new and upcoming version of SmartStream.

A separate UAT SmartStream URL will be included as part of your integration details for you to use. It is highly recommended that you maintain a replica environment of your own site with the UAT version of SmartStream integrated to enable you to review up-and-coming features and fixes before they reach Production.

Embedding a product

To display the HTML SmartStream product on your page you will first need to add the following scripts into the body of the page, preferably at the bottom to ensure that the SmartStream application is loaded after the elements of the page itself. The demo URLs should be replaced with your customer specific URLs, which will be provided by Genius Sports once a client specific version of the application has been generated.

```
<script src="https://bsdemo.betstream.betgenius.com/betstrear
  <script>
        var iframeApi = new IFrameApi("betgenius-iframe");
  </script>
```

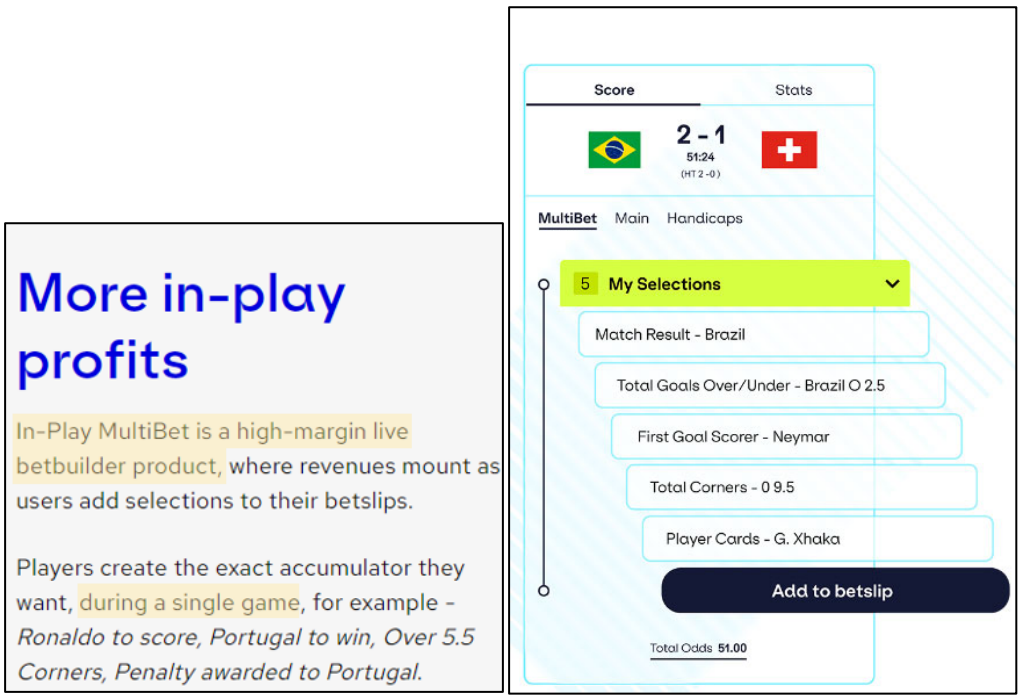
The iframe code below should be placed within the body of the webpage where you would like the HTML SmartStream product application to appear. The script below is an example that embeds a Football Scorecentre product and should be replaced with the location of your client specific product which will be provided by Genius Sports. The id of the iframe should match the parameter passed in the JavaScript object above.

```
<iframe scrolling="no" id="betgenius-iframe" src="https://bs
```

(*See,* PANDA_000077-PANDA_000078,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

179. As shown in the screenshots below, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.



(*See,* PANDA_000111 at PANDA_000112-PANDA_000113 https://geniussports.com/sportsbook/betting-data-odds/in-play-multibet/.)

- Genius Sports to provide sportsbooks with automated, AI-powered live odds enabling bettors to place same-game parlays during live play or game intervals
- The new product will be available for the FIFA World Cup, NFL, English Premier League and thousands of other official Genius events

Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has launched *In-Play MultiBet*, providing sportsbooks with a powerful new tool to engage players and grow revenues in time for the FIFA World Cup 2022 and ongoing NFL season.

Same-game parlay bets, which enable bettors to wager on multiple events occurring within the same game, have become an essential part of every major sportsbook's offering, giving customer's greater control over their bets and enhanced margins for the operators themselves.

Now, through *In-Play MultiBet*, these bespoke bets can be placed once the game has begun, enabling players to place bets after every goal, touchdown and during intervals.

Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

InPlay MultiBet will also be available across the NFL, English Premier League, Liga MX, and dozens of FIBA basketball and FIVB volleyball leagues worldwide.

"Combining same game parlays with the unstoppable growth of in-play betting is a breakthrough innovation for us and our partners," said **Jack Davison, Chief Commercial Officer of Genius Sports**. "Starting with the biggest sports event of the year, the FIFA World Cup, *InPlay MultiBet* will enable our partners to unlock bigger margins and drive engagement between key match events and breaks."

(S*ee,* PANDA_000179-PANDA_000180, https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/.)

180. The Genius Sports platform includes a plurality of media sources that "*provide a second copy of the first plurality of copies to a second viewer client device of the first plurality of viewer client devices via a third video Internet communication channel between the plurality of media sources and the second viewer client device of the first plurality of viewer client devices and provide a second copy of the second plurality of copies to a second viewer client device of the second plurality of viewer client devices via a fourth video Internet communication channel between the plurality of media sources and the second viewer client device of the second plurality of viewer client devices*." For example, the Genius Sports platform supports multiple users viewing the same sporting event simultaneously, such that a second viewer client device of the

first plurality of viewer client devices will be provided a second copy of the first plurality of copies.

181. Genius Sports' streaming product combines live sports data and live sports video. As stated below, Genius Sports' streaming product pairs "video, captured direct from pitch or courtside … with official data and live betting services…."

> ***New content is complemented by complete official data offering and will plug crucial gaps in in-play betting schedules – bet365 among the first to go live with the product.***
>
> Betgenius, a leading supplier of data and trading services to sportsbooks, has launched a live streaming service giving operators access to new content from sport competitions around the world.
>
> Derived from partnerships with official rights holder across multiple sports, the service features thousands of low latency streams including content which has never before been available to sportsbooks.
>
> By focusing on fixtures played at off-peak times, the service allows operators to offer a more engaging experience right around the clock, enhancing bet placement and customer retention during quiet scheduling periods.
>
> All video, captured direct from pitch or courtside, is paired with official data and live betting services, and features easy-access API integration.
>
> International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.
>
> Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.
>
> "Combined with fast, accurate data on thousands of fixtures, this is a new and cost-effective way to attract more customers with a complete and immersive live betting experience."

(*See,* PANDA_000015-PANDA_000016, https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.)

182. Genius Sports offers two options for sportsbooks to receive its live video stream offerings: (1) a Drop & Play video player developed in-house by Genius Sports that can be embedded in a sportsbook's webpage, and (2) a video API that can facilitate access to Genius Sport's live streams using a sportsbook's own video player. Both options result in a copy of a video stream being provided to a viewer client device, as claimed. Authentication data (e.g., a URL, token, DRM) is transmitted to the client device and is passed to a video player on the client device (e.g., the video player embedded in a sportsbook's website). The video player then requests and receives a copy of the video stream from an appropriate CDN using the authentication data.

183. <u>Option (1): Drop & Play</u>: For this option, Genius Sports provides a video player widget that can be integrated by a sportsbook into its website. When a user/viewer requests a

video stream while using the sportsbook's website, the back-end of the sportsbook's website transmits a query to Genius Sport's video API to retrieve authentication data related to the selected video stream. When the sportsbook's website retrieves this information, the authentication data is passed along to the video player, which in turn transmits a request from a CDN to retrieve the video stream. In this manner, a copy of the video stream is provided to the video player on the viewer client device via a communication channel between the CDN and the viewer client device. This process is depicted below.

Insert a script tag defining the desired fixture and the bookmaker source:

```
<script
  src="https://genius-live-player-production.betstream.betgenius.com/widgetLoader?customerId=YOUR_CUSTOMER_ID&fixtureId=YOUR_FIXTURE_ID">
</script>
```

Insert an element with defined id to attach the video player to it, should be the exact same one used as the script **containerId** parameter

```
<div id="YOUR_CONTAINER_ID" /> <!-- Defaults to geniusLive if a containerId is not set -->
```

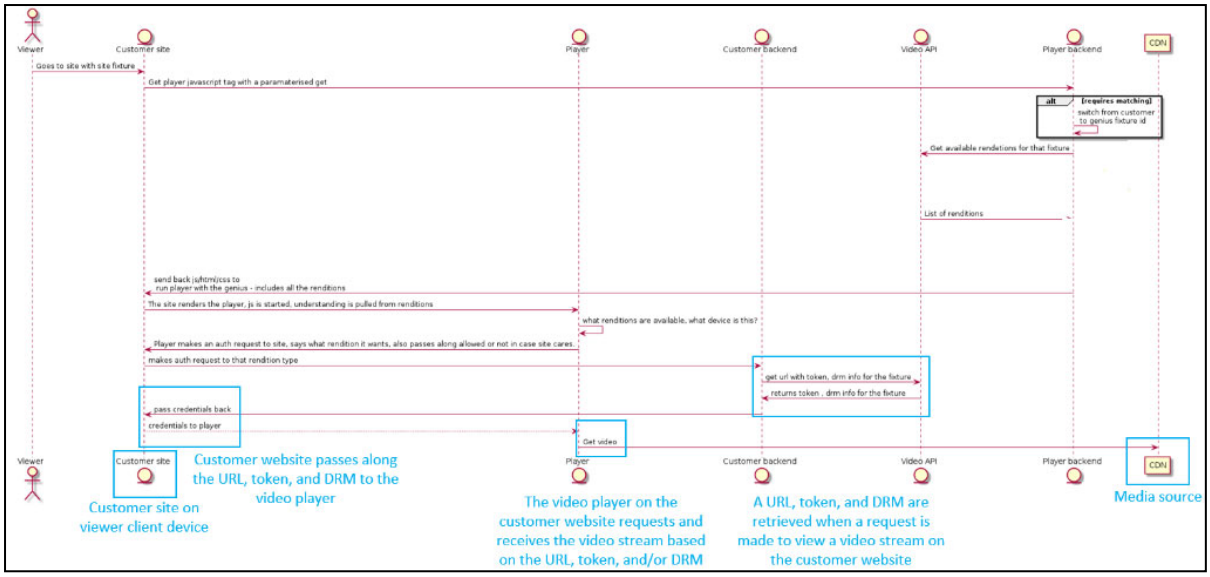
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

You embed a script tag in your site with the querystring parameters you are interested in passing to the player. Our player looks at the stream types available for the specific fixture you are trying to display and picks the most appropriate stream for your viewers device. Our script will then raise an event out to the containing window, with the necessary information to make a call to our API from your backend.

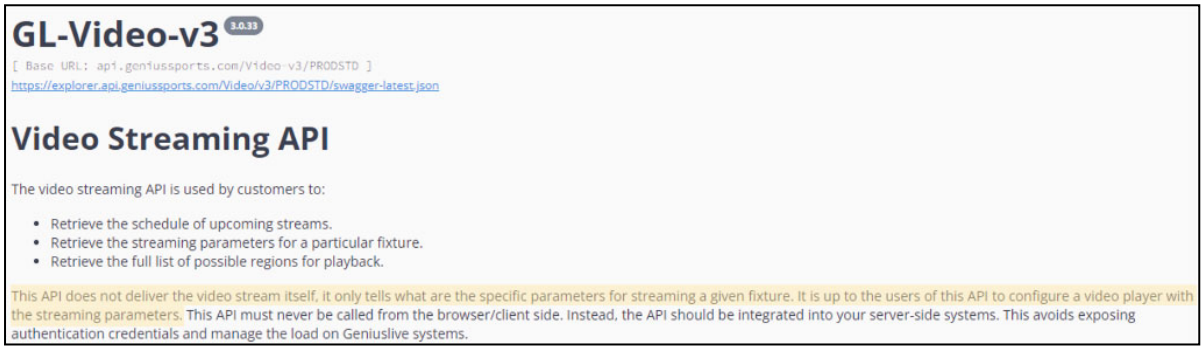
Our API should never be called from the browser directly.

The call to our backend, which is per fixture viewer session, retrieves a url, a token and any DRM information which you may need to play the fixture. You hand the response straight back to our player and it will play the fixture. Sensible HTTP error codes will be returned from our API around the status of the fixture and whether you have booked it.



(*See,* PANDA_000541, PANDA_000550, https://dap-docs.betstream.betgenius.com/how-to-integrate.)

184. Option (2): Video API: For this option, the back-end of the sportsbook's website first requests and retrieve authentication data (e.g., a URL, a token, and/or DRM) related to the selected video stream and then passes this information along to a video player to request and retrieve the video stream. The sportsbook provides its own video player, which must be configured to use CDN token authentication. A copy of the video stream is provided to the sportsbook's own video player on the viewer client device via a communication channel between the CDN and the viewer client device. This process is depicted below.



GL-Video-v3 3.0.33

[Base URL: api.geniussports.com/Video-v3/PRODSTD]

https://explorer.api.geniussports.com/Video/v3/PRODSTD/swagger-latest.json

Video Streaming API

The video streaming API is used by customers to:

- Retrieve the schedule of upcoming streams.
- Retrieve the streaming parameters for a particular fixture.
- Retrieve the full list of possible regions for playback.

This API does not deliver the video stream itself, it only tells what are the specific parameters for streaming a given fixture. It is up to the users of this API to configure a video player with the streaming parameters. This API must never be called from the browser/client side. Instead, the API should be integrated into your server-side systems. This avoids exposing authentication credentials and manage the load on Geniuslive systems.

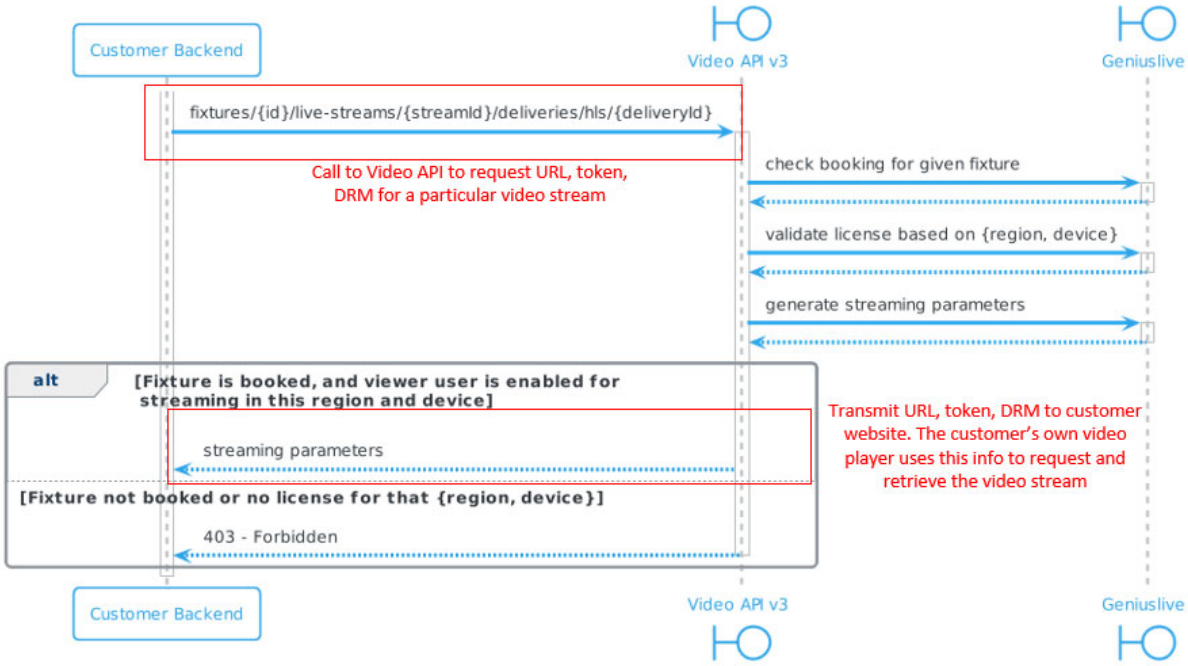
Player integration

You will need to add the necessary logic in your web site to call your backend to retrieve the schedule and the streaming parameters described before. Also, you will need to integrate a player in your site that can apply CDN token authentication. For specific competitions your player will also have to decrypt content using DRM.

Playing the content

Once you have retrieved the schedule and you have selected a fixture to watch, your site should do the following per viewer:

1. Geo-locate the viewer to know the region where the playback is requested
2. Validate if the viewer meets at least one of the permissions required by the selected live stream
3. Select the appropriate delivery to play from the selected live stream. You might need to check the client's platform to choose between HLS or DASh deliveries.
4. Call your backend to get the streaming parameters from the Video API.
5. Play the content using CDN token authentication (and DRM for specific competitions)



(S*ee,* PANDA_00217, PANDA_00222, https://swaggerui.api.geniussports.com/?url=https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json.)

185. On information and belief, Genius Sports' streaming product includes at least one socket server that *transmits at least the first score information of the first event information to the second viewer client device of the first plurality of viewer client devices via a third event information Internet communication channel between the at least one first event socket of the at least one socket server and the second viewer client device of the first plurality of viewer devices and transmits at least the second score information of the second event information to the second viewer client device of the second plurality of viewer client devices via a fourth event information*

Internet communication channel between the at least one second event socket of the at least one socket server and the second viewer client device of the second plurality of viewer devices. For example, the Genius Sports platform supports multiple users viewing the same sporting event simultaneously, such that a second viewer client device of the first plurality of viewer client devices will be provided a second copy of the first plurality of copies.

186. Genius Sports offers a Multibet widget, which can be integrated into the front-end of the sportsbook's platform. An end user using the sportsbook's platform can request a bet via the widget and the widget can thereafter retrieve the data needed to populate the end user's betslip. This data includes, for example, the bet generated by the sportsbook's trading platform, which is transmitted by Genius Sports' back-end (e.g., its Pricing Engine) to the Multibet widget. Although the bets are generated dynamically by the sportsbook's platform, the bets are always stored by Genius Sports for re-use.

> In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.
>
> It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

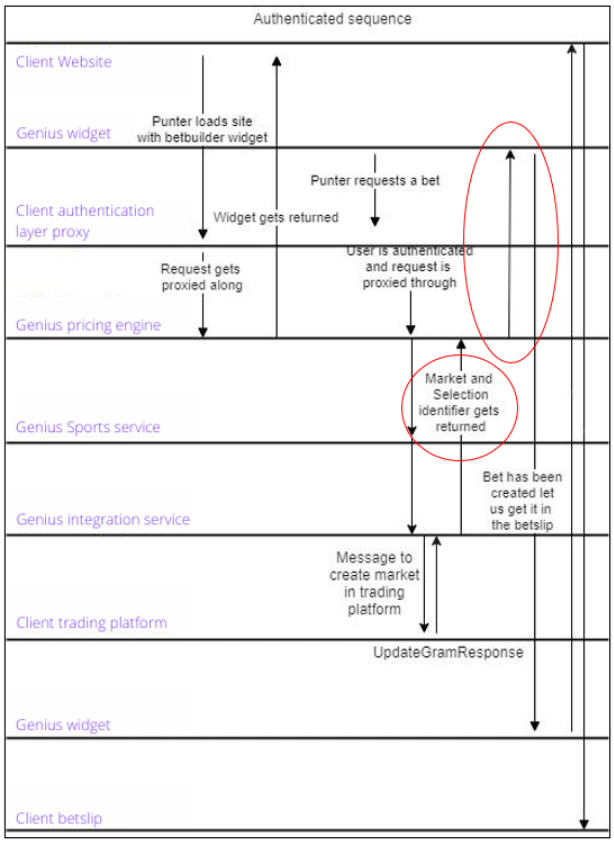
(S*ee,* PANDA_000065, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> Please note that latest platform response for each unique Multibet market will be stored on Genius Sports' system in order to be re-used for subsequent bets.

(S*ee,* PANDA_000533 at PANDA_000535,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664043/Multibet+Sportsbook+Integration+V3#Sportsbook-Trading-Platform-Response-to-Multibet-Market-Messages.)

187. The screenshot below confirms that Genius Sports transmits at least the bet generated by the sportsbook's trading platform to the Genius widget on client's device via the Internet.



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188. Communication between the Multibet widget and Genius Sport's back-end is accomplished using Genius Sport's SmartStream integration. SmartStream products are embedded within a webpage via an iframe.

Multibet Widget Integration

Our customers should embed the Multibet Widget through an iframe. When a player made his choice and requests a bet, the Multibet Widget will make a call to the customer's bet slip with all the required data to populate it with the selection details.

The technical information for the front-end integration can be found in the following space - SmartStream Integrations.

Customers that have already integrated with other Fan Engagement products such as betting widgets, Game Trackers, and Scoreboards can re-use the existing iframe implementation for the Multibet Widget.

(*See,* PANDA_000065,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

This page describes how to integrate with the variety of SmartStream products with examples.

All SmartStream products are hosted by Genius Sports and designed to be embedded within a client hosted webpage via an iframe.

(*See,* PANDA_000077,

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SmartStream Release Process

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After two weeks have passed with no critical issues, the version will be pushed to Production where it will be visible on your live site. It is at your discretion that you keep track of these release notes to ensure you are still successfully integrating and that you are satisfied with the new and upcoming version of SmartStream.

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```
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```

(*See,* PANDA_000077-PANDA_000078,

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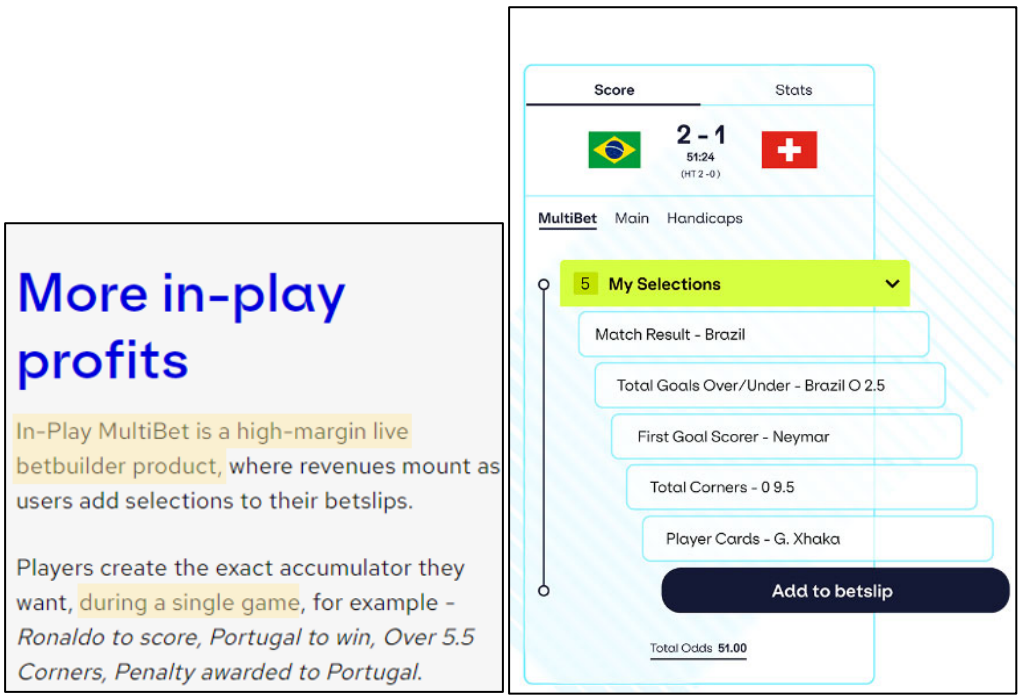
189. As shown in the screenshots below, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.



(*See,* PANDA_000111 at PANDA_000112-PANDA_000113, https://geniussports.com/sportsbook/betting-data-odds/in-play-multibet/.)

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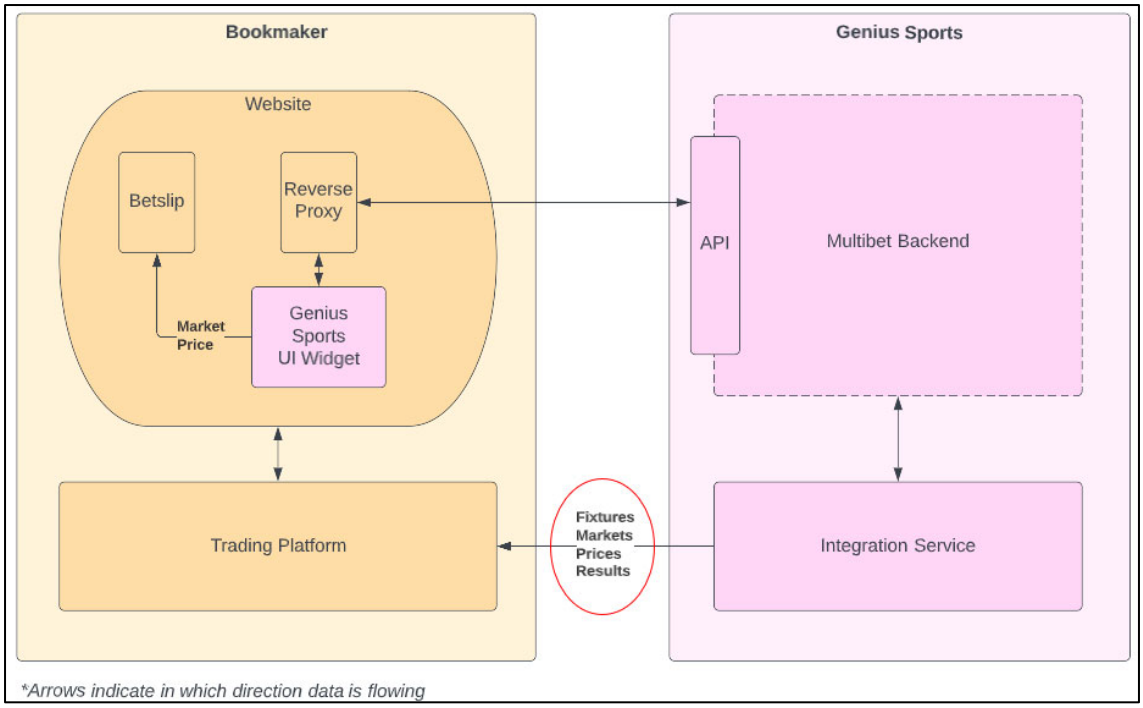
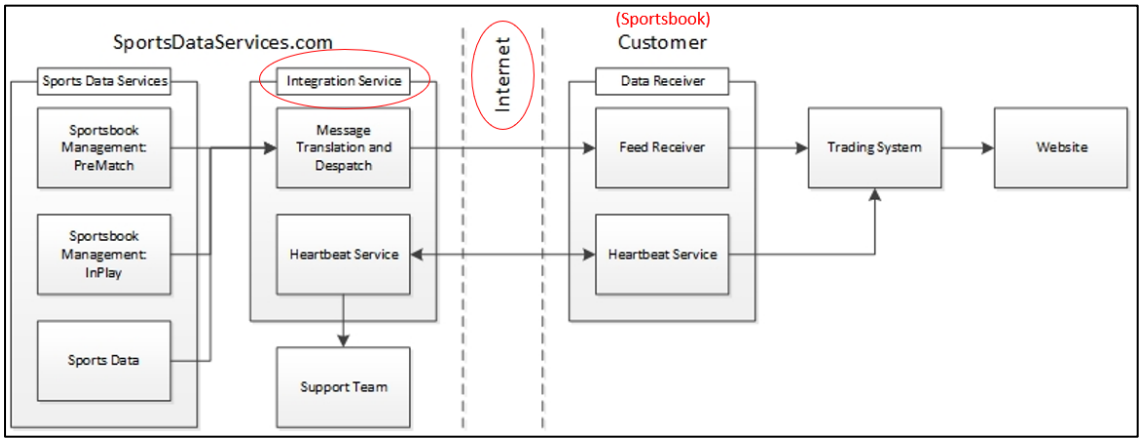
(S*ee,* PANDA_000179-PANDA_000180, https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/.)

190. During operation, Genius Sport's Integration Service (provided by Sportsbook Integration (V3)) transmits various data (fixtures, markets, prices, results) to the sportsbook's trading platform via an Internet connection. Additionally, the Integration Service transmits a message to create a market (bet) in the sportsbook's trading platform. In return, the generated bet is transmitted from the trading platform to the Integration Service. In this manner, the sportsbook and Genius Sports services retrieve information germane to the first live sporting event via the Internet.



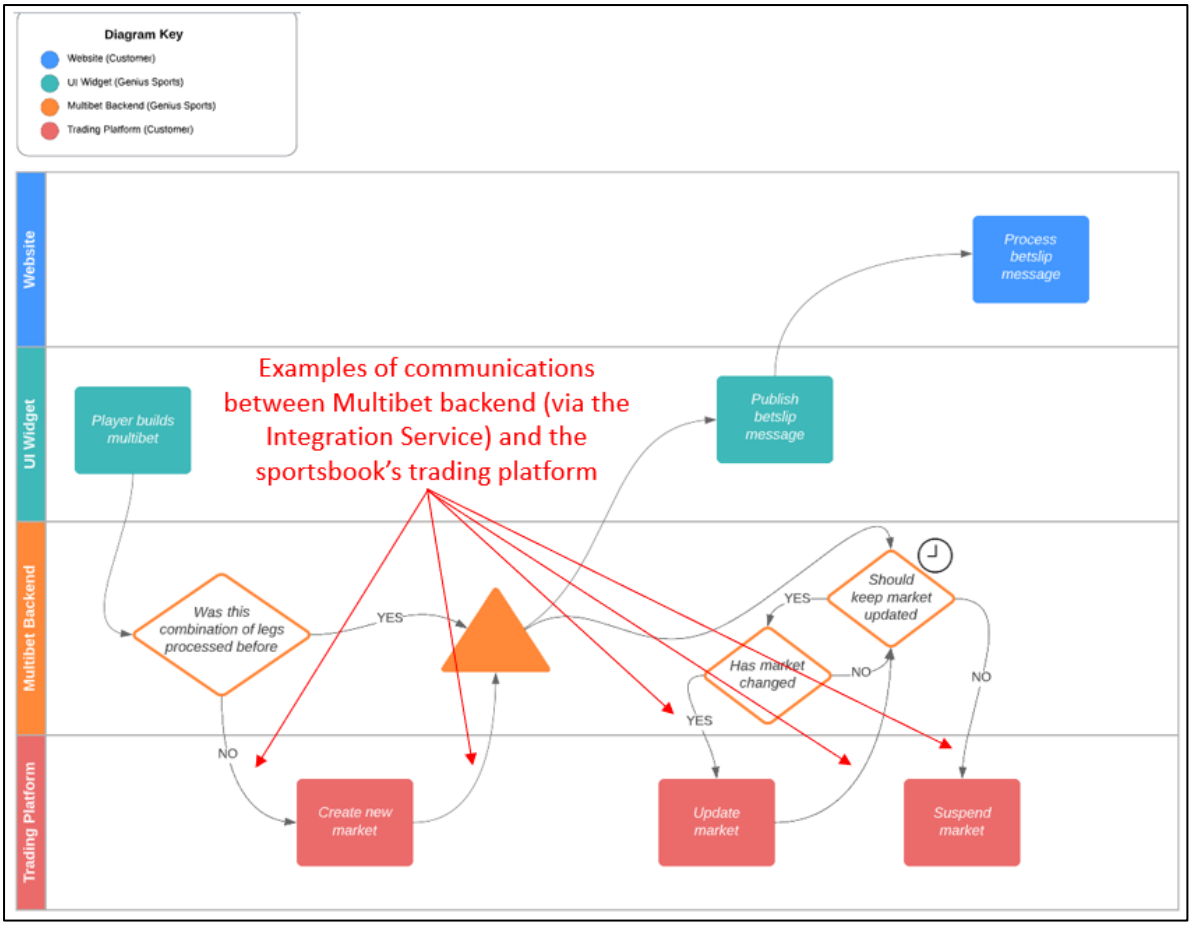
(*See,* PANDA_00212 at PANDA_00213,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664027/Multibet+Back-End+Integration.)



(*See,* PANDA_000539,

https://geniussports.atlassian.net/wiki/spaces/BID/pages/34822492/Integration+Schema.)



(*See,* PANDA_00209 at PANDA_00210, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284187362/Market+Lifetime.)

191. Each claim in the '697 Patent recites an independent invention. Neither claims 19 and 20, described above, nor any other individual claim is representative of all claims in the '697 Patent.

192. Defendant has been aware of the '697 Patent since at least the filing of this Complaint. Further, Plaintiff provided affirmative notice of the '697 Patent to Defendant by sending a letter on October 4, 2023, informing Defendant of its infringement of the '697 Patent. Additionally, Plaintiff has met with and had communications with executives at Genius Sports since 2018.

193. Defendant directly infringes at least claims 19 and 20 of the ’697 Patent, either literally or under the doctrine of equivalents, by making, using, offering to sell, and selling the systems described above.

194. Defendant’s partners, customers, and end users of its Accused Products and corresponding systems and services directly infringe at least claims 19 and 20 of the ’697 Patent, literally or under the doctrine of equivalents, at least by using the Accused Products and corresponding systems and services, as described above.

195. Defendant has actively induced and are actively inducing infringement of at least claims 19 and 20 of the ’697 Patent with specific intent to induce infringement, and/or willful blindness to the possibility that its acts induce infringement, in violation of 35 U.S.C. § 271(b). For example, Defendant encourages and induces customers to use Genius Sports in a manner that infringes claims 19 and 20 of the ’697 Patent at least by offering and providing the software and by engaging in activities relating to selling, marketing, advertising, promotion, installation, support, and distribution of the Accused Products.

196. Defendant encourages, instructs, directs, and/or requires third parties—including its certified partners and/or customers—to use the Accused Products in infringing ways.

197. Defendant further encourages and induces its customers to infringe claims 19 and 20 of the ’697 Patent: 1) by widely advertising those services, and providing technical support and instructions to users, and 2) through activities relating to marketing, advertising, promotion, installation, support, and distribution of the Accused Products, including its video streaming software, and services in the United States.

198. Further, as the entity that provides installation, implementation, and integration of the Accused Products in addition to ensuring the Accused Product remains operational for each

customer through ongoing technical support, on information and belief, Defendant and/or Defendant's partners affirmatively aid and abet each customer's use of the Accused Products in a manner that infringes the '697 Patent.

199. Defendant also contributes to the infringement of its partners, customers, and end-users of the Accused Products by providing within the United States or importing into the United States the Accused Products, constituting a material part of the inventions claimed, and not a staple article or commodity of commerce suitable for substantial non-infringing uses.

200. Indeed, as shown above, the Accused Products have no substantial non-infringing uses because the accused functionality, including the one-to-many socket architecture and separate channels for video and event information, is an integral part of the Accused Products and must be performed for the Accused Products to perform their intended purpose. These functionalities are continually running when the system is in use and, on information and belief, cannot be removed or disabled (or, if they could, the system would no longer suitably function for its intended purpose). Moreover, for the same reasons, without the system and components identified above that practice the '697 Patent, that functionality could not be performed.

201. Additionally, the accused functionality, including the one-to-many socket architecture and separate channels for video and event information, itself has no substantial non-infringing uses because the components, modules and methods identified above are a necessary part of that functionality. For example, without the one-to-many socket architecture, the Accused Products could not effectively synchronize the event information across multiple viewers. These functionalities are continually running when the system is in use and cannot be removed or disabled (or, if they could, the system would no longer suitably function for its intended purpose).

Moreover, for the same reasons, without the system and components identified above that practice claimed in the ’697 Patent, that functionality could not be performed.

202. In addition, as shown in the detailed analysis above, the products, systems, modules, and methods provided by Defendant constitute a material part of the invention—indeed, they provide all the components, modules, and features that perform the claimed methods and systems. For example, the Accused Products and accused functionalities (e.g., the one-to-many architecture) constitute a material part of the inventions claimed because such architecture is integral to the system as recited in the claims of the ’697 Patent. None of these products are staple goods—they are sophisticated and customized video-streaming products, methods, and systems.

203. On information and belief, the infringing actions of each partner, customer, and/or end-user of the Accused Products are attributable to Defendant. For example, on information and belief, Defendant directs and controls the activities or actions of its partners or others in connection with the Accused Products by contractual agreement or otherwise requiring partners or others to provide information and instructions to customers who acquire the Accused Products which, when followed, results in infringement. Defendant further directs and controls the operation of devices executing the Accused Products by programming the software which, when executed by a customer or end user, performs the claimed method of at least claims 19 and 20 of the ’697 Patent.

204. Plaintiff has suffered and continues to suffer damages, including lost profits, as a result of Defendant’s infringement of the ’697 Patent. Defendant is therefore liable to Plaintiff under 35 U.S.C. § 284 for damages in an amount that adequately compensates Plaintiff for Defendant’s infringement, but no less than a reasonable royalty.

205. Plaintiff will continue to suffer irreparable harm unless this Court preliminarily and permanently enjoins Defendant, its agents, employees, representatives, and all others acting in concert with Defendant from infringing the '697 Patent.

206. Defendant's infringement of the '697 Patent is knowing and willful. Defendant acquired actual knowledge of the '697 Patent at least upon the filing of this Complaint. Further, Plaintiff provided affirmative notice of the '697 Patent to Defendant by sending a letter on October 4, 2023, informing Defendant of its infringement of the '697 Patent.

207. On information and belief, despite Defendant's knowledge of the Asserted Patents and Plaintiff's patented technologies, Defendant made the deliberate decision to sell products and services that it knew infringe the '697 Patent. Defendant's continued infringement of the '697 Patent with knowledge of the '697 Patent constitutes willful infringement.

208. Plaintiff's allegations of direct infringement, indirect infringement, and willful infringement with respect to this patent are further set forth in Exhibit 6.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

a) That this Court adjudge and decree that Defendant has been, and is currently, infringing each of the Asserted Patents;

b) That this Court award damages to Plaintiff to compensate Plaintiff for Defendant's past infringement of the Asserted Patents, through the date of trial in this action;

c) That this Court award pre- and post-judgment interest on such damages to Plaintiff;

d) That this Court order an accounting of damages incurred by Plaintiff from six years prior to the date this lawsuit was filed through the entry of a final, non-appealable

judgment;

e) That this Court determine that this patent infringement case is exceptional and award Plaintiff its costs and attorneys' fees incurred in this action;

f) That this Court award increased damages under 35 U.S.C. § 284;

g) That this Court preliminarily and permanently enjoin Defendant from infringing any of the Asserted Patents;

h) That this Court order Defendant to:

(i) recall and collect from all persons and entities that have purchased any and all products found to infringe any of the Asserted Patents that were made, offered for sale, sold, or otherwise distributed in the United States by Defendant or anyone acting on its behalf;

(ii) destroy or deliver all such infringing products to Plaintiff;

(iii) revoke all licenses to all such infringing products;

(iv) disable all web pages offering or advertising all such infringing products;

(v) destroy all other marketing materials relating to all such infringing products;

(vi) disable all applications providing access to all such infringing software; and

(vii) destroy all infringing software that exists on hosted systems;

i) That this Court, if it declines to enjoin Defendant from infringing any of the Asserted Patents, award damages for future infringement in lieu of an injunction; and

j) That this Court award such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff respectfully requests a trial by jury on all issues triable thereby.

DATED: October 5, 2023

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