[redacted]

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

SPORTSCASTR INC. (d/b/a PANDA INTERACTIVE), Plaintiff, v. SPORTRADAR GROUP, AG, and SPORTRADAR AG, Defendants.	Civil Action No. 2:23-cv-00472-JRG (LEAD CASE)
SPORTSCASTR INC. (d/b/a PANDA INTERACTIVE), Plaintiff, v. GENIUS SPORTS LTD., GENIUS SPORTS MEDIA LTD., GENIUS SPORTS TECHNOLOGIES LTD., GENIUS SPORTS UK LTD., GENIUS SPORTS GROUP LTD., MAVEN TOPCO LTD., MAVEN MIDCO LTD., MAVEN DEBTCO LTD., and MAVEN BIDCO LTD., Defendants.	Civil Action No. 2:23-cv-00471-JRG (MEMBER CASE)

THIRD AMENDED COMPLAINT FOR PATENT INFRINGEMENT
AND FEDERAL ANTITRUST AND STATE LAW VIOLATIONS

Plaintiff SportsCastr Inc. (d/b/a PANDA Interactive) ("Plaintiff" or "PANDA") alleges against Defendant Genius Sports Ltd., Genius Sports Holdings Ltd., Genius Sports Media Ltd., Genius Sports UK Ltd., Genius Sports Technologies Ltd., Genius Sports Group Ltd., Maven

[redacted]

Topco Ltd., Maven Midco Ltd., Maven Debtco Ltd., and Maven Bidco Ltd. (collectively "Defendants" or "Genius Sports") the following:

1. Genius Sports has willfully and maliciously copied PANDA's patented technology and incorporated that technology into products that directly compete with PANDA. Worse still, Genius Sports has coerced potential PANDA customers into using its own infringing products by conditioning access to essential data—which only Genius Sports controls—on the use of those infringing products. This conduct violates not only the U.S. patent laws but also federal and state antitrust laws. PANDA brings this action to redress the harm caused by Genius Sports' infringement and its tying practices, which foreclose PANDA's products from competing in the marketplace.

2. 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 track real-time sports betting odds and related stats and to place real-time sports wagers through an integrated platform that synchronizes sports media content and sports data, such as stats and odds. PANDA's technology is ultra-low latency, push-based and scalable to millions of viewers. It has been widely copied in other streaming products, and even more so in the exploding online sports betting industry. PANDA's patented technology underpins the sports streaming industry's offerings; but those offerings, including Defendants' offerings are without license or authorization and infringe PANDA's patents.

3. 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

[redacted]

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.

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

5. 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.

6. 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.

7. 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 when live streaming sports, or sports-betting related content, any noticeable offset often confuses viewers, and greatly hampers the viewing experience.

8. 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.

9. 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.

10. 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.

11. 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.

12. Plaintiff's patented technologies, on the other hand, employ a novel socket server architecture, in which a socket is dedicated to at least one live event and streams event information to all viewers watching that live event. 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 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/.)

13. In operation, in some embodiments, Plaintiff's patented technologies employ a web server to deliver a uniform resource locator (URL), which contains the address of the socket for the streamed event, to viewers interested in watching the event. Viewers can then use the received URL to connect to a 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.

14. Plaintiff's patented technologies also employ separate channels for digital content (e.g., video content) and event information. More specifically and as an example, video content is received at a viewer device on a first communication channel (*e.g.*, from a media server), while other video-related, contextual information (*e.g.*, game status, price information) are received on a second communication channel originating at a designated socket of socket server. The different information streams on the 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.

15. 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.

16. 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 Sports 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.

17. 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"), 10,425,697 ("the '697 Patent"), and 11,871,088 ("the '088 Patent").

18. 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 Defendants' illegal and unauthorized use of Plaintiff's patented technology, Defendants have earned significantly increased profits, revenue, market capital, and market share.

19. In addition to infringing PANDA's patents, Defendants have also engaged in anticompetitive conduct to foreclose PANDA from marketing its own products. Defendants have unlawfully "tied" two products together by coercing and compelling their customers into tying agreements that condition access to data exclusively controlled by Defendants on purchasing

[redacted]

Defendants' infringing low latency technology. This tie satisfies all criteria for per se condemnation because the tie involves two separate products and a significant amount of interstate commerce in the tied product market, and Defendants have sufficient market power in the market for the tying product to enable them to restrain trade in the market for the tied product. Moreover, Defendants' tying conduct has foreclosed competition in the tied market, denying customers freedom of choice, foreclosing key inputs and business opportunities to rivals, imposing supracompetitive prices, and ultimately harming competition.

20. Defendants' conduct ties two separate and distinct products. The first involves the distribution of official, live professional sports data to online sportsbooks, sports betting apps, and media companies (e.g., mobile apps, mobile and desktop web, and OTT-based sports betting applications), and the second concerns the technology and platforms that enable the delivery and use of this data. The sports leagues whose data are relevant to Defendants' anticompetitive actions are the National Football League ("NFL"), National College Athletic Association ("NCAA"), and the Premier League. Customers in these product markets include sportsbooks and sports betting apps, which require both official, real-time league data and low latency streams to allow users to place bets.

21. Beginning in 2019, Defendants entered into long-term exclusive licenses with certain sports leagues, through which they gained access to the sole official real-time, in-game league data streaming rights. Separately, [redacted]

22. Importantly here, Defendants have locked up all official, live NFL, NCAA, and

[redacted]

Premier League real-time, in-game league data. Through these exclusive deals, Defendants have gained durable monopoly power in (1) the market for official NFL real-time, in-game league data, (2) the markets for each official NCAA sport real-time, in-game league data, and (3) the market for official Premier League real-time, in-game league data. Their monopoly power is durable because the exclusive deals with the NFL, NCAA, and Premier League are long-term (ranging from seven to ten years). Through their monopoly position in these data markets, Defendants then coerce, or force, their customers to purchase Defendants' own infringing sports betting app technology—e.g., the technology and platforms that enable and provide the delivery of the event data alone or in combination with digital content (*e.g.*, audio or video streams)—by tying the technology with the customers' access to the official, live data. Upon information and belief, Defendants' sports betting app technology is more expensive and less efficient than others' (including Plaintiff's) technology, but customers have no choice but to purchase this lower-quality, higher-priced tied product.

23. Defendants are not selling their sports betting app technology by creating a superior product—instead, they coercively and anticompetitively tie their technology to their exclusive access to official, live NFL, NCAA (Football and Basketball), and Premier League data. Defendants have coercively conditioned their provision of official, live sports data on customers also utilizing their sports betting app technology.

24. For example, [redacted]

[1] [redacted]

[redacted]

25. On information and belief, [redacted] Customers have told PANDA that they could not adopt PANDA's sports betting app technology products because they would lose access to official sports league data unless they used Genius Sports' sports betting app technology products. [redacted]

[redacted]

[redacted]. PANDA CUB is a flexible ad-tech solution that sportsbooks can deploy across any digital property to power targeted advertising and engagement that includes inline live odds, lines, and betting overlays that add context and real-time information to digital media.

26. There is no technical or procompetitive reason that a sports betting app technology customer must obtain official, live sports data from the same source. Indeed, there are many examples of customers purchasing official, live sports data from one source, and combining it with another company's sports betting app technology. For example, in 2020, PANDA provided [redacted] Today, PANDA provides its sports betting app technology—PANDA Studio and PANDA CUB—to clients who are able to request data feeds from multiple discrete sources.

27. Despite the ability to offer these products and services separately, Defendants have coercively tied them together. By doing so, Defendants are able to extract supracompetitive prices for their lower-quality sports betting app technology. By depriving customers of the ability to freely choose their preferred sports betting app technology, Defendants have inflicted antitrust injuries on Plaintiff, which also competes in this market.

28. In furtherance of the above anticompetitive conduct, Defendants have also expressly or implicitly coordinated with another major provider of sports data and online betting technology—Sportradar. These two "competitors" have illegally worked to divide the relevant United States markets—for example, Defendants monopolize the NFL, NCAA, and Premier

[redacted]

League data markets and Sportradar monopolizes the NBA, MLB and NHL data markets. (*See* https://investors.sportradar.com/news-releases/news-release-details/sportradar-and-national-hockey-league-announce-landmark-10-year; https://investors.sportradar.com/news-releases/news-release-details/nba-and-sportradar-announce-landmark-long-term-global; https://investors.sportradar.com/news-releases/news-release-details/major-league-baseball-and-sportradar-announce-expanded-exclusive.)

29. Football DataCo ("FDC") is the rights holder for live, official data for United Kingdom football leagues, including the Premier League, Football League, and Scottish Professional Football League. Sportradar and Genius have entered into agreements with each other concerning access to FDC league data [redacted] Those agreements resolved antitrust claims brought by Sportradar against Genius Sports and FDC. Under the agreements, [redacted]

[redacted]

30. On information and belief, Defendants and Sportradar have similar agreements (whether express or implied) in dividing up other portions of the sports betting app technology market, including for the use of NHL, NBA, MLB (Sportradar), each NCAA sport (e.g., Football, Men's Basketball, etc.), and NFL (Genius) data.

31. Plaintiff brings this action to seek damages for and ultimately to stop Defendants' continued infringement of Plaintiff's patents, including in particular the '687, '218,'697, and '088 Patents (collectively, the "Asserted Patents"; Exhibits 1-3 and 7). Plaintiff also seeks all available legal and equitable relief, including treble damages, stemming from Defendants' federal antitrust and related state-law violations. As a result of Defendants' 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

32. Plaintiff brings claims under the patent laws of the United States, 35 U.S.C. § 1, *et seq*., for infringement of the Asserted Patents. Defendants have infringed and continues to infringe each of the Asserted Patents under at least 35 U.S.C. §§271(a), 271(b) and 271(c). Plaintiff also brings claims under the Sherman Antitrust Act of 1890, 15 U.S.C. § 1, et seq., and the Texas Free Enterprise and Antitrust Act of 1983, Tex. Bus. & Comm. Code § 15.01, et seq. Defendants have engaged in anticompetitive conduct by tying access to its exclusive official, real-time league data with the use of its sports betting app technology in violation of at least 15 U.S.C. § 1 and Tex. Bus. & Comm. Code § 15.05.

[redacted]

THE PARTIES

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

34. 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.

35. Plaintiff is a registered business in Delaware.

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

37. On information and belief, Defendant Maven Topco Ltd. is a foreign entity incorporated in Guernsey with its headquarters and principal place of business in London, England. Maven Topco Ltd. is a wholly owned subsidiary of Genius Sports. Ltd.

38. On information and belief, Defendant Maven Midco Ltd. is a foreign entity incorporated in the United Kingdom with a headquarters and principal place of business in London, England. Maven Midco Ltd. is a wholly owned subsidiary of Maven Topco Ltd.

39. On information and belief, Defendant Maven Debtco Ltd. is a foreign entity incorporated in the United Kingdom with a headquarters and principal place of business in London, England. Maven Debtco Ltd. is a wholly owned subsidiary of Maven Midco Ltd.

40. On information and belief, Defendant Maven Bidco Ltd. is a foreign entity incorporated in the United Kingdom with a headquarters and principal place of business in London, England. Maven Bidco Ltd. is a wholly owned subsidiary of Maven Debtco Ltd.

41. On information and belief, Defendant Genius Sports Group Limited is a foreign entity incorporated in the United Kingdom with a principal place of business in London, England. Genius Sports Group Limited is a wholly owned subsidiary of Maven Bidco Ltd. Genius Sports Group Limited in turn wholly owns Genius Sports Holding Limited.

42. On information and belief, Defendant Genius Sports Holdings Ltd. is a foreign entity incorporated in the United Kingdom with a principal place of business in London, England. Genius Sports Holdings Ltd. is a wholly owned subsidiary of Genius Sports Group Ltd.

43. On information and belief, Defendant Genius Sports UK Ltd. is a foreign entity incorporated in the United Kingdom with its headquarters and principal place of business in London, England. Genius Sports UK Ltd. is a wholly owned subsidiary of Genius Sports Holdings Ltd.

44. On information and belief, Defendant Genius Sports Technologies Limited is a foreign entity incorporated in the United Kingdom with a principal place of business in London, England. Genius Sports Technologies Limited is a wholly owned subsidiary of Genius Sports Holdings Ltd.

45. On information and belief, Defendant Genius Sports Media Limited is a foreign entity incorporated in the United Kingdom with a principal place of business in London, England. Genius Sports Media Limited is a wholly owned subsidiary of Genius Sports Holdings Ltd. Genius Sports Media Limited in turn wholly owns Genius Sports Media Inc.

JURISDICTION & VENUE

46. 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).

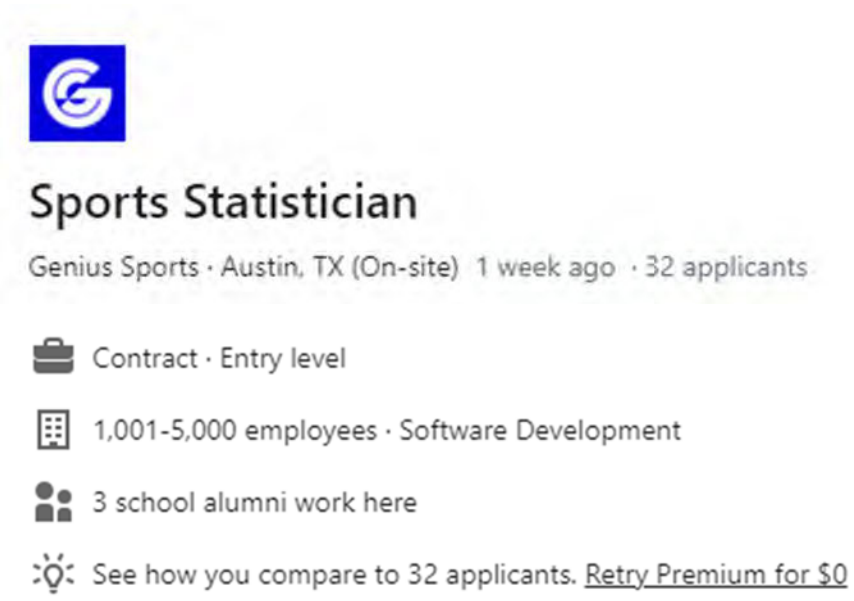
47. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c)

[redacted]

and 28 U.S.C. § 1400(b). Upon information and belief, each of the Defendants 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.

48. On information and belief, each of the Defendants 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.

49. On information and belief, each of the Defendants 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:

[redacted]

(*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.

50. 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

[redacted]

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, Genius Sports provided services that practice the systems and methods claimed in the Asserted Patents in the State of Texas and within this District.

51. 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.)

52. 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-legalizedl *see also,* PANDA_000206-PANDA_000208, https://www.gamingtoday.com/news/louisiana-sports-betting-texans-crossing-state-border-impact/.)

[redacted]

53. 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/.)

54. 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

[redacted]

is the home stadium for the Arlington Renegades.

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

55. 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.

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

57. 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-

[redacted]

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.)

58. [redacted]

59. 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).

GENIUS SPORTS' CORPORATE STRUCTURE

60. Genius Sports Ltd. is a publicly traded company [redacted]

[redacted]

[redacted]

61. In its financial statements, Genius Sports Ltd. claims that it is the company providing the Accused Products "to the sports, sports betting, and sports media industries":

Genius Sports Limited
Notes to Condensed Consolidated Financial Statements
(Unaudited)

Note 1. Description of Business and Summary of Significant Accounting Policies

Description of Business

Genius Sports Limited (the "Company" or "Genius") is a non-cellular company limited by shares incorporated on October 21, 2020 under the laws of Guernsey. The Company was formed for the purpose of effectuating a merger pursuant to a definitive business combination agreement ("Business Combination Agreement"), dated October 27, 2020, by and among dMY Technology Group, Inc. II ("dMY"), Maven Topco Limited ("Maven Topco"), Maven Midco Limited, Galileo NewCo Limited, Genius Merger Sub, Inc., and dMY Sponsor II, LLC (the "Merger"). Upon the closing of the Merger on April 20, 2021 (the "Closing"), the Company changed its name from Galileo NewCo Limited to Genius Sports Limited. The Company's ordinary shares are currently listed on the New York Stock Exchange ("NYSE") under the symbol "GENI".

The Company is a provider of scalable, technology-led products and services to the sports, sports betting, and sports media industries. The Company is a data and technology company that enables consumer-facing businesses such as sports leagues, sportsbook operators and media companies to engage with their customers. The scope of the Company's software bridges the entire sports data journey, from intuitive applications that enable accurate real-time data capture, to the creation and provision of in-game betting odds and digital content that helps the Company's customers create engaging experiences for the ultimate end-users, who are primarily sports fans.

(*See* https://d18rn0p25nwr6d.cloudfront.net/CIK-0001834489/ce4824d5-ea8f-435d-9036-

[redacted]

c1c1e27970ae.pdf.)

62. Genius Sports [redacted]. For example, [redacted]. Shortly thereafter, Genius Sports Ltd. issues a press release claiming that "The National Football League ("NFL") and Genius Sports Ltd. ("Genius Sports") (NYSE:GENI) have agreed to a multi-year extension." [redacted]

> The National Football League ("NFL") and Genius Sports Limited ("Genius Sports") (NYSE:GENI) have agreed to a multi-year extension of their existing strategic partnership to power the next generation of NFL fan experiences through official data and video distribution. The new extended deal will run through the end of the 2027-28 season. Genius Sports will remain the NFL's exclusive distributor of real-time, official play-by-play statistics, proprietary Next Gen Stats ("NGS") data and the NFL's official sports betting data feed to media companies and sports betting operators globally.

(*See* https://www.geniussports.com/newsroom/nfl-extends-strategic-partnership-with-genius-sports-as-exclusive-official-data-watch-bet-partner/.)

63. Genius Sports reports all of its financials for all Defendants in a consolidated manner. Genius Sports also engages in "significant intercompany balances and transactions" that do not appear in its consolidated financial statements. Through these financial statements, Genius Sports Ltd. claims the revenue of its subsidiaries as its own and as a basis for shareholders of Genius Sports Ltd. to value the company.

> The condensed consolidated financial statements include the accounts and operations of the Company, inclusive of its wholly-owned subsidiaries. All significant intercompany balances and transactions have been eliminated in consolidation.

(*Id.*)

[redacted]

64. According to Genius Sports Ltd., [redacted]

65. Genius Sports Ltd. and its subsidiaries do not operate as independent entities. Rather, the corporate family is collectively controlled and directed. Genius Sports Ltd. and its subsidiaries work together in a coordinated and centrally directed fashion to develop, market, sell, distribute, and maintain the Accused Products.

66. Genius Sports Ltd. and its subsidiaries are commonly controlled via shared owners, officers, and directors. For example, Genius Sports Ltd.'s Chief Executive Officer, Mark Locke, is also a Director and the Chief Executive Officer for Genius Sports Holdings Ltd., Genius Sports Media Ltd., Genius Sports Technologies Ltd., Genius Sports Group Ltd., and Genius Sports UK Ltd., and other affiliated entities. Genius Sports Ltd.'s Chief Financial Officer, Nicholas Taylor, is also a Director and Chief Financial Officer of the remaining Defendants. Jack Davison, Genius Sports Ltd.'s Chief Commercial Officer, is a Director of Genius Sports Holdings Ltd. and Genius Sports Technologies Ltd. He is also the Managing Director of Genius Sports UK Ltd.

67. Mr. Locke is also the Chief Executive Officer of each of the Defendants. Mr. Davison is also the Chief Commercial Officer of each of the Defendants.

68. Mr. Davison is listed on Genius Sports' website as its Chief Commercial Officer

[redacted]

without any distinction between the companies that make up the Genius Sports corporate family.

Mr. Davison has [redacted]

[redacted]

[redacted]

[redacted]

(*Id.* at 7.)

69. [redacted]

70. Despite being the primary entities contracting with other businesses in the United States to sell the Accused Products, Genius Sports claims that [redacted]

[redacted]

[redacted]

71. This claim stands in stark contrast to public statements by Genius Sports, such as its CFO's claim that it's "betting product" i.e., the Accused Products, "contributed $66 million of revenue" in the third quarter of 2023 alone. (*See* https://www.sportico.com/business/finance/2023/genius-sports-q3-earnings-1234746433/.)

72. Genius's SEC filings similarly show $67M in quarterly revenue for the period ending June 30, 2024, for their "Betting Technology, Content and Services."

Key Components of Revenue and Expenses

Revenue

Genius generates revenue primarily through delivery of products and services to customers in connection with the following major product lines: Betting Technology, Content and Services, Media Technology, Content and Services, and Sports Technology and Services. The following table shows Genius' revenue split by product line, for the periods indicated:

	Three Months Ended June 30,		Six Months Ended June 30,	
	2024	2023	2024	2023
	(dollars, in thousands)			
Revenue by Product Line				
Betting Technology, Content and Services	$ 67,124	$ 56,862	$ 141,021	$ 121,602
Media Technology, Content and Services	17,953	18,357	53,428	40,121
Sports Technology and Services	10,370	11,628	20,716	22,353
Total Revenue	**$ 95,447**	**$ 86,847**	**$ 215,165**	**$ 184,076**

Betting Technology, Content and Services — revenue is primarily generated through the delivery of official sports data for in-game and pre-match betting and outsourced bookmaking services through the Genius' proprietary sportsbook platform. Customers access Genius' sportsbook platform and associated services through the cloud over the contract term. Customer contracts are typically either on (i) a "fixed" basis, requiring customers to pay a guaranteed minimum recurring fee for a specified number of events, with incremental per-event fees thereafter, or (ii) a "variable" basis, based on a percentage share of the customer's Gross Gaming Revenue ("GGR"), typically with minimum payment guarantees. Minimum guarantee amounts are generally recognized over the life of the contract on a straight-line basis, while generally variable fees based on profit sharing and per event overage fees are recognized as earned. Genius believes that its minimum payment guarantees provide for enhanced revenue visibility while the variable component of its contracts benefits Genius as its partners grow

(*See* https://d18rn0p25nwr6d.cloudfront.net/CIK-0001834489/ce4824d5-ea8f-435d-9036-c1c1e27970ae.pdf.)

73. PANDA also believes that revenue for at least some of the Accused Products is recognized in the "Media Technology, Content and Services" and/or "Sports Technology and

[redacted]

Services."

74. As an example for just one of the Accused Products, Genius Sports claimed that in "its new in-game betting product BetVision" (an Accused Product in this case) "over half of the bets on the system were in-play bets, which generated the lion's share of the handle, at ***83%***." "Handle" refers to the total amount of money wagered by bettors in the system. (*Id.*)

75. Genius Sports CEO, Locke, further noted that "Genius takes about three times as much of a fee for in-play bets as it does with tradition pre-game bets." He further stated that, "As we continue to increase the in-play betting, we directly benefit from this higher revenue share at no incremental cost." (*Id.*)

76. Genius Sports' public statements to the investment community and litigation statements to PANDA simply do not add up, leading PANDA to conclude that Genius Sports much be creatively—and perhaps inappropriately—attributing revenue from its sale and licensing of the Accused Products to various entities within its corporate family.

77. For example, in this litigation, Genius Sports now claims that the ultimate parent Genius Sports Ltd.'s [redacted] Yet Genius Sports Ltd. has a roughly $1.7 billion market cap:

[redacted]

[redacted]

78. This statement seemingly contradicts the above public statements. But it also confirms 1) that Genius Sports Group Limited (a named Defendant) is also actively involved in, and/or controlling, one or more of the Genius Sports entities to direct activity into the United States (including the sale, offer for sale, making, using, and/pr importing of the Accused Products) and recognizing the revenue (or at least the value) from that infringing activity [redacted]

79. [redacted] and overlap of officers and directors, Genius Sports Ltd. and its subsidiaries do not operate at arms-length. Rather, the entities are commonly controlled and directed to make, use, sell, offer to sell, or import into the United States the Accused Products. Because Genius Sports Ltd. and its subsidiaries operate as a unitary business venture, they are jointly and severally liable for the acts of patent infringement alleged herein. Moreover, for the same reasons, each of the subsidiaries also acts as an agent of its corporate parents and, ultimately, of Genius Sports Ltd.

80. In fact, in its SEC filings, for the section entitled "Management's Discussion and Analysis of Financial Condition and Results of Operation," which describes Genius Sports business including its "offerings" (including the Accused Products), infringing actions, and associated revenue, Genius Sports treats, and attributes, all of the activity to "Genius Sports Limited and ***all of its subsidiaries***."

MANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS

For purposes of this section, "we," "our," "us", "Genius" and the "company" refer to Genius Sports Limited and all of its subsidiaries.

[redacted]

(*See* https://d18rn0p25nwr6d.cloudfront.net/CIK-0001834489/ce4824d5-ea8f-435d-9036-c1c1e27970ae.pdf at 24.)

81. In that same section, where actions and revenues are attributed to "Genius Sports Limited and all of its subsidiaries," Genius Sports makes clear that they conduct business in the Unites States with, for example, the National Football League.

Events under Official Sports Data and Streaming Rights

Genius establishes long-term, mutually beneficial relationships with sports leagues, federations and teams that enable its partners to collect, organize and communicate data internally (e.g., for coaching analysis) or externally (e.g., for posting on fan-facing websites) and grant to Genius the rights to collect, distribute and monetize official sport data. Genius seeks to maintain an optimal portfolio of data rights, from high profile, widely followed sports events, such as the English Premier League ("EPL"), National Football League ("NFL") and other Tier 1 sports, to more specialized and less widely followed events, such as non-European soccer, non-US basketball, professional volleyball and other Tier 2 to 4 sports. This provides Genius with global breadth and depth of coverage across all tiers of sport, all time zones, and all geographical locations.

Data rights for Tier 1 sports, which include the most popular sports leagues, are typically acquired via formal tender processes and competitive bidding often resulting in high acquisition costs. For example, Genius' UK soccer data rights contract, which runs through the end of the 2024-2025 season and NFL data rights contract, which runs through the end of the 2027-2028 season, accounts for a significant majority of Genius' third-party data rights fees. Genius believes that its inventory of selectively acquired Tier 1 data rights is important to establishing relationships with sportsbooks on beneficial terms.

(*Id*. at 25.)

82. In that same section, where actions and revenues are attributed to "Genius Sports Limited and all of its subsidiaries," Genius Sports makes clear that these data and streaming rights deals (including the NFL) "form the backbone of its business model and are a principal driver of revenue, particularly for the Betting Technology, Content, and Services product line."

Genius' events under official sports data and streaming rights form the backbone of its business model, and are a principal driver of revenue, particularly for the Betting Technology, Content and Services product line. Genius defines an "event" as a single sports match or competitive event. Genius' rights to collect, distribute and monetize the data related to such events may be exclusive (meaning that Genius has the exclusive right to collect, distribute, and monetize such data), co-exclusive (meaning that Genius shares collection, distribution, and monetization rights with one other company) or non-exclusive.

Genius believes that data under official sports data and streaming rights is critical to sportsbooks, as only official data provides guaranteed access to the fast and reliable data necessary for in-game betting. To remain competitive, sportsbooks must be able to operate and provide customers with betting content around the clock, every single day of the year. This requires an extensive and broad portfolio of data and other content from Tier 1 and Tier 2-4 sports events. Events under exclusive rights give Genius an added commercial advantage over competitors and serve as a barrier of entry, making Genius an essential provider to its customers.

(*Id*.)

83. Therefore, on information and belief, for this additional reason and in Genius Sports' own words, each of the actions of the subsidiaries are equally attributable to each other

and their corporate parents, and each entity is jointly and severally liable for the infringement in the United States, and in the State of Texas.

84. The parties to this action are properly joined under 35 U.S.C. § 299 because of the right to relief asserted against Defendants jointly and severally arises out of the same series and transactions or occurrences relating to the making and using of the same products or processes. Additionally, questions of fact common to all Defendants will arise in this action.

PLAINTIFF'S PATENTED INNOVATIONS

85. 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.

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

87. The '687, '218,'697, and '088 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,'697, and '088 Patents.

88. 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.

[redacted]

62/371,558, filed on August 5, 2016. A true and correct copy of the ’687 Patent is attached as Exhibit 1.

89. 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.

90. 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.

91. The ’088 Patent is entitled “Systems, apparatus, and methods for providing event video streams and synchronized event information via multiple internet channels,” was filed on June 6, 2022, and was duly and legally issued by the USPTO on January 9, 2024. The ’088 Patent claims priority to U.S. provisional application No. 62/507,158, filed on May 16, 2017. A true and correct copy of the ’088 Patent is attached as Exhibit 7.

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

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

[redacted]

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.*)

94. 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.)

95. 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, in some embodiments, the patented technologies may 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 corresponding socket. In

[redacted]

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.)

96. 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, for example, 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 video stream of the event or commentary provides many technological improvements, including 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.)

97. 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.

98. 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

[redacted]

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.)

99. For example, one technical challenge overcome by the inventive concepts described and claimed in certain embodiments 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.)

100. The Asserted Patents describe and claim technological solutions 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.)

101. As discussed above, embodiments provide that 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

[redacted]

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.)

102. 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 to offer personalized broadcasts in multiple languages and vantage points. (Exhibit 2, '218 Patent, at 27:14-22.)

103. 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.

104. Unlike conventional systems, in the technological solutions 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

[redacted]

(*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.)

105. 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

106. Defendants offer for sale, import, make, sell, and use several products that provide and implement video streaming platforms for individuals and enterprises and incorporate Plaintiff's patented technologies. PANDA also hereby incorporates by references its current and its Amended Infringement Contentions, which set forth its current infringement allegations based on the discovery in the case thus far.

107. Out of the various applications of the patented video streaming technology, Defendants chose to implement it in sports betting products and services. More specifically,

[redacted]

Defendants implement 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.

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

109. 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.

PANDA LAUNCHED REVOLUTIONARY SPORTS BETTING APP TECHNOLOGY

110. PANDA was one of the first companies to revolutionize interactive sports betting. PANDA quickly became a healthy and viable competitor seeking to acquire standard partnerships and agreements with sports leagues, sportsbooks, and sports media across the United States.

111. PANDA, for many years after its inception, did in fact land many coveted partnership agreements and gained access to key data that is needed to survive in the sports betting app technology market.

112. For example, PANDA entered into an agreement with [redacted] This relationship, however, was terminated abruptly, around the time that Genius obtained exclusive distribution rights for official real-time league data for the NFL. (*See, e.g.*, https://www.nfl.com/news/nfl-extends-strategic-partnership-with-genius-sports.) Deploying anti-competitive pressure on [redacted] Genius Sports used its exclusive

[redacted]

control over official league and betting data for the NFL to force [redacted] to adopt its technology, and jettison PANDA's.

113. In the mid-2010s, Genius Sports began its relationships with major sports leagues, most importantly the NFL, NCAA, and Premier League. These relationships included partnerships to become major sources for official betting data, which is critical for authorized gaming operators and fans seeking to engage with sports leagues through betting. These agreements, which included access to low-latency official sports data, would often be non-exclusive and co-existed with rivals' agreements to use the same data. These competing partnerships signaled and facilitated healthy competition in a new and emerging market.

GENIUS SPORTS' ANTICOMPETITIVE CONDUCT AND RELATED MARKET IMPACTS

114. In 2021, this healthy competition ended. Unwilling to continue to compete on the merits of their products, Genius Sports along with Sportradar moved to secure *exclusive* media and data rights from sports leagues. Then, Genius Sports (along with Sportradar) used those rights to force sportsbooks to utilize their sports betting products rather than PANDA's. Indeed, during a recent earnings call Genius Sports CEO Mark Locke recently admitted that Sportradar and Genius Sports are "operating in an increasingly duopolistic competitive environment," where "all the major global data rights sit with only the two largest players for the balance of the decade." (*See* https://www.alphaspread.com/security/nyse/geni/earnings-calls/q2-2024.) This division of power is not the result of competitive practices but rather the coordinated action between Sportradar and Genius Sports to engage in a scheme whereby they divide the market for sports betting app technology and collectively lock down exclusive rights to the official league and betting data for all major sports in the United States. Similarly, in its own Q3 earnings report, Sportradar boasted of the nexus between its exclusive "partnership with the NBA" and its ability

[redacted]

to "launch[] a suite of next-generation products and solutions," including "emBet," Sportradar's sportsbook-facing betting software. (*See* https://investors.sportradar.com/news-releases/news-release-details/sportradar-reports-third-quarter-2024-financial-results-and.)

115. In April 2021, Genius Sports entered an agreement with the NFL to become "the NFL's exclusive 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 sports betting operators globally, including the U.S." (*See* https://investors.geniussports.com/news/news-details/2021/National-Football-League-Taps-Genius-Sports-Group-As-Exclusive-Distributor-of-Official-League-Data/default.aspx.) This agreement, which has been extended multiple times, currently runs through the end of the NFL's 2027-28 season. (*See* https://investors.geniussports.com/news/news-details/2023/National-Football-League-Extends-Strategic-Partnership-with-Genius-Sports-as-Exclusive-Official-NFL-Data-and-Watch--Bet-Distribution-Partner/default.aspx.)

116. In May 2018, Genius Sports entered an agreement with the NCAA to become "the NCAA's exclusive agent in licensing real-time official data from championship events, including NCAA March Madness, to media platforms and other companies." (*See* https://investors.geniussports.com/news/news-details/2018/NCAA-launches-transformative-statistics-initiative/default.aspx.) Genius Sports continues to be "the exclusive distributor of official NCAA data." (*See* https://www.geniussports.com/newsroom/dvsport-strikes-new-partnership-with-genius-sports-to-power-officiating-and-coaching-solutions-with-live-college-sports-data/.)

117. In May 2019, Genius Sports entered an agreement with "Football DataCo, the data rights holder of all competitions organised by the Premier League" to become "its official supplier

[redacted]

of live data to the global sports betting sector." (*See* https://investors.geniussports.com/news/news-details/2019/Genius-Sports-Group-secures-landmark-betting-data-agreement-with-Football-DataCo/default.aspx.) This agreement, which has been extended multiple times, currently runs through 2029. (*See* https://investors.geniussports.com/news/news-details/2024/Genius-Sports-and-Football-DataCo-Extend-Exclusive-Official-Data-Partnership-Through-2029/default.aspx.)

118. [redacted]

119. Even high-level sports league executives acknowledge that it has "become very clear to everybody in the betting industry in the U.S. that our official data feed is necessary to be competitive in offering" a sports betting product, including a sports betting app technology product. (*See* Sports Business Journal, *Genius Sports to provide MLB feed to sportsbooks* (March 24, 2021), *available at* https://www.sportsbusinessjournal.com/Daily/Closing-Bell/2021/03/24/Genius-MLB.aspx.) This acknowledges the obvious—competitors like PANDA cannot compete where access to PANDA's products means customers lose their access to official sports data.

120. That view is also held by many of the customers in the industry, who are required to transact with the company, in this case Genius Sports, which holds the exclusive data distribution agreement. For example, PANDA has met with several large sports leagues and

[redacted]

betting operators to use its top-of-the-line platform. [redacted]

121. Genius Sports readily acknowledges the market power it has amassed through these long-term lockups with leagues, and how these arrangements have created an opportunity to grow its sales and up-sell its related products with their official data agreements. For instance, Genius Sports' Chief Executive Officer, Mark Locke, recently explained that Genius Sports' contract renewals with sportsbooks "really involved the requirement for a rollout of BetVision across the term, which is something that we've universally succeeded with. So that is part of all of the deals. And again, that was a commitment I've made to the market previously about having ubiquity of product across the industry." (*See* https://finance.yahoo.com/news/q3-2024-genius-sports-ltd-070854774.html.)

122. Using its monopolistic control over official, live sports data, Genius Sports coerces customers into purchasing Genius Sports' sports betting app technology by tying it to Genius Sports' exclusive ability to distribute official league data, foreclosing the market to Genius Sports' competitors. The customer's choice is not due to Genius Sports' superior product, or even more favorable pricing. It is solely due to the fact that Genius Sports has tied essential data, over which it maintains exclusive control, to its sports betting app technology. [redacted]

123. There is no technical impediment to a customer combining official NFL, NCAA, or Premier League data licensed from Genius Sports with another company's (like PANDA's)

[redacted]

technology. That is so because PANDA's platforms, like Genius Sports', could use that official data (*e.g.*, from the customer or the league itself), and, absent the anticompetitive tie, the customer could use this data with PANDA's platform, which could deliver low latency feeds to customers and normalize the data and synchronize it with the video, which PANDA can stream for the customer in PANDA Studio. The only barrier to PANDA's viability as a competitor, in other words, is the anticompetitive tie prohibiting customers, such as sportsbooks, from using PANDA's platform.

124. Genius Sports is engaged in, and its activities substantially affect, interstate trade and commerce. Genius Sports markets and provides services across, and without regard to, state lines. For example, Genius Sports is based in Guernsey, has offices in California, Florida, and New York, and operates across state lines. Genius Sports' customers are located in multiple states, including FanDuel, which is headquartered in New York, and DraftKings, headquartered in Massachusetts, both of which operate in multiple states. Users in at least Arizona, Colorado, Connecticut, the District of Columbia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, New Jersey, New York, North Carolina, Pennsylvania, Ohio, Tennessee, Vermont, Virginia, West Virginia, and Wyoming can access the betting data and place bets via Genius Sports' sports betting app technology. (*See* https://www.fanduel.com/legal-sports-betting-us-map.)

125. Genius Sports' anticompetitive activities and effects extend even into states where sports betting is not yet legal, including Texas. Genius Sports gathers official betting data—which it then ties to its sports betting app technology—from sporting events held throughout the country, including from NCAA events hosted by the University of Texas, University of Houston, and Southern Methodist University as well as NFL events hosted by the Dallas Cowboys and Houston

[redacted]

Rockets. Genius Sports ties this official data to its sports betting app technology and sells both to sportsbooks and other customers that actively target out of state residents—including Texas residents—to cross state lines and engage in sports betting. Members of the sports betting industry—including Genius Sports—are well aware of and intend these effects. Genius Sports' customers, including FanDuel and DraftKings, regularly advertise in Texas.

RELEVANT PRODUCT MARKETS

126. This action involves several distinct sets of data markets and one technology market.

127. The data-related product markets in this action are: (1) the distribution of data rights to official, live NFL data to sportsbooks, sports betting apps, and media companies market; (2) the distribution of data rights to official, live NCAA data to sportsbooks, sports betting apps, and media companies markets (each NCAA sport, such as NCAA Football, NCAA Men's Basketball, NCAA Women's Basketball, constituting its own distinct market); and (3) the distribution of data rights to official, live Premier League data to sportsbooks, sports betting apps, and media companies market (the "Tying Markets"). The Tying Markets include the rights to official, low-latency, real-time sports data for the NFL, NCAA, and Premier League respectively.

128. There is also a separate product market for sports betting app technology (the "Tied Market") where Defendants compete with Plaintiff via sales of their infringing products. The Tied Market includes mobile app, mobile and desktop web, and OTT application technologies that make use of this sports data to track real-time sports betting odds and related stats and to place real-time sports wagers both before a game starts (pregame) and during the game (in-game).

129. The sports betting app technology market includes the systems, software, and

[redacted]

applications (collectively, a "Platform") on mobile apps, desktop and mobile web, and through OTT platforms that enable, and provide for, 1) the delivery and streaming of the official league sports data alone or in combination with streaming digital content such as audio and/or video broadcast streams (such as the Genius Sports API and backend systems, along with the SDKs and software that provides the interfaces, connections to, and synchronization of the official data and streams for client devices); and 2) the use of that data for online betting, ad tech, and entertainment purposes. The latter includes the real-time display and consumption of that data and digital content by sportsbooks, sportsbook apps, and media companies (*e.g.*, by adding the data and video streams into the sportsbooks, sportsbook apps, or media companies' applications themselves, such as through widgets, applications, video players, or other components) and/or to the end users (*e.g.*, through user-facing applications and user interfaces, and other front-end software components). This technology includes the platforms and components that comprise, for example, Genius Sports' Sportsbook Platform and live streaming services, including the Genius API and backend systems, the MultiBet, BetVision, FANHub, GeniusLive, and GeniusLive+ products.

130. While sports data is a necessary input to sports betting applications, the technology required for delivering the data to customers for purposes of betting or entertainment on mobile apps, desktop and mobile web, or OTT application, and for enabling those uses and consumption, is a separate product. At least until Defendants started tying these products together, Sportsbooks had purchased these products separately, and were listed as separate products in their licensing agreements. Moreover, absent Defendants' tying conduct, the tying and tied products could be purchased separately from different suppliers. For example, in 2020, PANDA participated in a pilot program with [redacted]

[redacted]

[redacted] PANDA did not need proprietary or exclusive access to any data or media source in order to successfully implement its sports betting app technology. PANDA received positive feedback from [redacted] regarding the pilot program. On information and belief, despite the success of the pilot program, [redacted] did not extend the agreement because of anticompetitive pressure from Genius Sports.

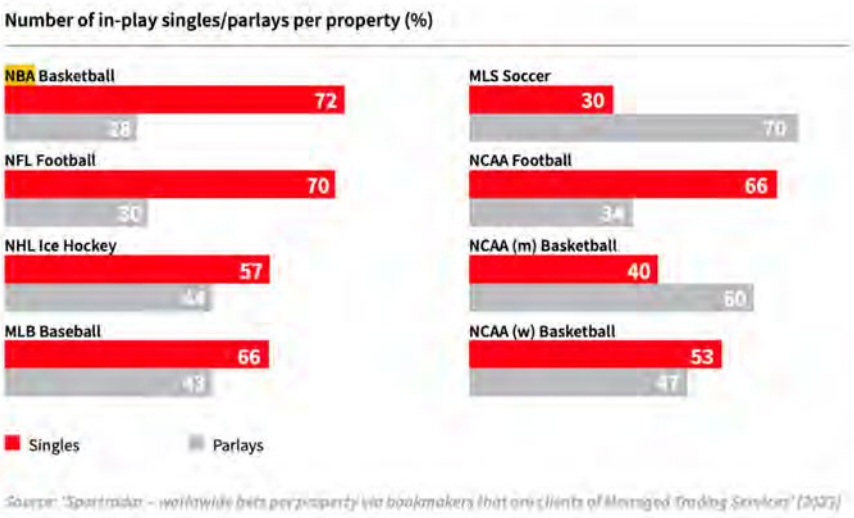
131. There are no reasonable or adequate economic substitutes for official, live league data. Data for one league cannot substitute for another league's data where a user wants to bet on an NFL, NCAA, or Premier League game. The Tying Markets are distinct and unique. Customers engaging in sports wagering often stick to one sport league and do not cross-wager into other sports leagues. Several factors deter bettors of one sport from crossing into another sport. For example, individuals may not enjoy watching—and by extension wagering on—different sports or different sports leagues. Individuals may prefer to watch the sports league in which their alma mater or hometown professional team plays or may prefer amateur or professional sports. Additionally, individuals may not possess the requisite knowledge of various sports—such as player statistics, team strengths, etc.—to feel comfortable making informed wagering decisions across sports or across sports leagues. The sports wagering industry acknowledges that most knowledgeable consumers focus on a single sport while wagering. (*See* Betting Brain, *Sports Betting Strategy: Advantages to Specializing in One Sport* (Nov. 4, 2018), *available at* https://www.bettingbrain.com/strategy/advantages-to-specializing-in-one-sport/.) This same logic applies not only across sports but also across sports leagues. For example, bettors on NFL games develop an understanding of "how trends develop for certain players, certain teams, or even league wide." (*Id.*) This specialized knowledge of which teams or players are performing

[redacted]

well in the NFL—and thus which bets are more favorable—would not aid a bettor wagering on NCAA Football. Therefore, the markets for sports wagering are distinct and unique markets for each sport league. The market for wagering on NFL games is distinct and unique from the market for wagering on NCAA football games or other NCAA sports and Premier League games.

132. For example, the NBA has a game format, e.g., fast pace of play, that is well-suited for in-play betting. Sportradar's Chief Executive Officer has identified these differences, calling the NBA "a better betting sport" because of its unique, dynamic nature. (*See* https://sports.yahoo.com/sportradar-revenue-jumps-30-deals-173803704.html.)

133. Moreover, public data supports the notion that different leagues are unique betting and data markets in and of themselves:



134. Moreover, unofficial league data cannot substitute for real time, live official league data because sports books and users rely on real time, live data to place bets. The official data—to which only Genius Sports has access in the Tying Markets—delivers a feed up to eight seconds quicker than any traditional broadcast. These market realities, in effect, force sportsbook providers and other customers to work with the party that has access to the official data and make

[redacted]

it impossible to offer a quality product without access to such data. Indeed, the Major Sports Leagues describe the importance of their official data to betting applications:

- David Highhill, vice president and general manager of sports betting for the National Football League (NFL), said ***"almost 100 percent"*** of the U.S. sports-betting market is using the league's official data. "It is vital as the source of record," he said. "We don't get a lot of pushback. "I think it's unique for us that we can incorporate not only our down in distance, as quickly and as accurately as we can, which is faster and better than anyone but also that we can layer on our next gen statistics," he added, referring to proprietary data collected from player and ball tracking.
- Eric Rimsky, U.S. head of fantasy sports and betting for the National Basketball Association (NBA), said that he believes official data will only become more valuable as the popularity of in-game betting continues to grow. "Now we're seeing greater than 40 percent [in-game] but we expect to have closer to 70 percent, which is what we're seeing internationally for in-game betting," he said. "So official league data becomes even more important as we move along that spectrum."
- Casey Brett, senior vice president of business development at Major League Baseball (MLB), added that the league's value proposition when it comes to official league data is about "speed, accuracy, and data fidelity richness." "I can't name a sportsbook that isn't using official league data right now," Brett said. "It's been really successful in terms of helping to drive a lot of product innovation, which is the whole purpose for us. "Nobody's denying the speed component relative to an unofficial data source," he continued, adding that the latency from the field to the data feed "right now just isn't being beat in the market." "Will there always be an unofficial data stream? Yes, I think that is something at the end of the day, there's somebody who can sit in front of a TV screen and log a game,"

[redacted]

> Brett added. "Will it ever be able to beat the official? No, and I think the gap is actually going to widen because of the fact that we continue to invest in a lot of product development."

(*See* https://www.vixio.com/insights/gc-us-sports-leagues-remain-high-official-data-value-pushback-begins.)

135. Similarly, there are no reasonable or adequate economic substitutes for the Tied Market. The Tied Market includes technologies for mobile apps, mobile and desktop web, and OTT sports betting applications, and does not include in-person betting at sports books. Sports betting technologies are not interchangeable with in-person wagering. Application-based betting provides a unique experience to users—allowing them to immediately react to live, real-time data and make near-instantaneous bets both before and during a sporting event—that cannot be replicated by other means, and cannot operate without sports betting app technology. There is unique and growing demand for live stream app-based betting, and that demand cannot be met without offering sports betting app technology.

136. Moreover, the convenience, accuracy, and ease of access using sports betting app technology cannot be readily substituted by other products or services. For example, in-person betting requires a physical presence at a betting shop or casino and is appealing to a different segment of the population. Additionally, in at least Colorado, Kentucky, Massachusetts, North Carolina, New Jersey, Tennessee, Vermont, Virginia, and Wyoming, sports betting is *only* legal when done online via sports betting app technology. (*See* https://www.fanduel.com/legal-sports-betting-us-map.) Online betting has seen significant growth given its ease of transacting and convenience.

137. PANDA competes with Genius Sports in the Tied Market and offers sports betting app technology called PANDA Studio and PANDA CUB. PANDA Studio is provided to sportsbooks and other customers and has been used to distribute sports betting data feeds alongside live event streaming and commentary in a unified, interactive experience for clients including [redacted]

[redacted]

PANDA also had business relationships with [redacted] before that relationship was lost, terminated, or not renewed as a result of Genius Sports' anticompetitive conduct.

138. The sports betting app technologies offered by Genius Sports (e.g., Genius Sports' Sportsbook Platform and live streaming services, including the Genius API and backend systems, the MultiBet, BetVision, FANHub, GeniusLive, and GeniusLive+ products) and PANDA (PANDA Studio and PANDA CUB) are reasonable substitutes for each other because each of the above systems are part of platforms that sportsbooks, sportsbook apps, and media companies can choose from to deliver low latency data and streaming digital content synchronized across a scalable number of users.

RELEVANT GEOGRAPHIC MARKET

139. The relevant geographic market is the United States of America.

140. Though various states in the United States have different regulations surrounding sports betting, these regulations do not affect the operation of the parties' sports betting products. Moreover, mobile apps, desktop and mobile web, and OTT sports betting applications do not consider these differences in determining which sports betting app technology to adopt. Customers rely upon the same sports betting applications, placing the same types of bets upon the same sports anywhere in the United States of America that sports betting is legal.

141. In the alternative, even if the relevant geographic markets are the fifty individual U.S. states and territories, the Defendants would still have market power in each of those markets for the tying product market for the reasons described below, including because the Defendants have the exclusive distribution rights for official league data in each of these states and territories.

DEFENDANTS' MARKET POWER IN THE TYING MARKETS

142. As noted above, the Relevant Markets were once highly competitive. Yet today none of the competitors, including PANDA, can compete with Genius Sports because of Genius Sports' anticompetitive policies and conduct—tying access to its exclusive data with its own coercive requirement to use its sports betting app technology.

143. Specific to the Tying Markets, Genius Sports controls 100% of the official, live

[redacted]

data in the NFL, NCAA, and Premier League data Tying Markets.

144. Genius Sports has near total control in the Tying Markets because of its exclusive agreements.

145. Genius Sports market dominance in the Tying Markets is protected and reinforced by high barriers to entry and expansion. Sports leagues' official, live data is available from only one source—the leagues themselves. Genius Sports' exclusive agreements with the NFL, NCAA, and Premier League to distribute their official data are long term deals, [redacted] making it impossible for competitors to break in. There are no adequate substitutes to the leagues' official, live data. Unofficial data can be delayed by many seconds, making it unreliable to place bets. To comply with regulatory and integrity requirements, sportsbooks will often not accept unofficial data to settle bets.

146. Genius Sports' market dominance is reinforced in part through network effects and high switching costs, which it consciously exploits to its advantage. As explained above, all of the relevant NFL, NCAA, and Premier League data is now under Genius Sports' exclusive use, and customers are in turn required to use Genius Sports' platform. Genius Sports has used these unlawful tying arrangements to gain further control over customers and to compel such firms, like betting operators or sportsbooks, to agree to Genius Sports' above-market prices and other anticompetitive terms or practices. Through these anticompetitive arrangements, Genius Sports has gained network effects by accessing a network of customers that spans hundreds of sportsbook clients and media companies. There are many customers doing business on Genius Sports' platform that would like to do business with PANDA or other rivals, or to expand the scope of their relationships with such rivals, but that cannot justify doing or expanding business with Genius Sports' competitors for fear of the adverse economic consequences that could result from any threat to their Genius Sports' relationship. As a result, it is simply too risky to do business with Genius Sports' competitors, even one like PANDA that revolutionized the industry. In sum, given the critical importance of official, live data to having a commercially viable sports betting platform that offers in-play betting on NFL, NCAA or Premier League games, customers have no

[redacted]

choice but to accept Genius Sports' condition of also buying its technology.

147. Because of Genius Sports' unlawful tying, customers are being forced to use an inferior and more expensive product than they would absent the anticompetitive conduct.

148. In light of the aforementioned barriers, it is highly unlikely that any meaningful new entry or expansion into the Tying or Tied Markets will occur on a timely or sufficient basis to limit or restrain Genius Sports' substantial market and monopoly power.

DEFENDANTS ALSO HAVE MARKET POWER IN THE ALTERNATIVE TYING MARKET FOR DISTRIBUTION OF DATA RIGHTS ACROSS ALL SPORTS LEAGUES

149. After discovery, to the extent the data supports a single tying market for the distribution of official data across ***all*** sports leagues, the Defendants would still have market power in that market (i.e., the distribution of data rights to official, live sports league data to sportsbooks, sports betting apps, and media companies market) ("Alternative Tying Market"). The sports leagues for which Genius Sports controls official, live sports data are among the most popular in the United States. In particular, the NFL, NCAA Football, and NCAA Men's Basketball, are three of the most popular sports in the country by viewership and by consumption of official league data for purposes of sports betting.

150. On information and belief—whether measured by gaming revenue or consumption of official sports league data—over 30% (and likely over 40%) of official, live sports data consumed or utilized via sportsbooks, sports betting apps, and media companies is attributable to sports leagues for which Genius Sports exclusively controls official, live sports data.

151. Moreover, sportsbooks, sports betting apps, and media companies need to include at least each of the major sports leagues' official data on their betting platforms to remain competitive, especially given that some bettors bet on only individual sports leagues, while others may bet on multiple leagues. Thus, Genius Sports' exclusive access to the distribution rights to three of the most popular sports in the country gives Genius Sports market power, regardless of whether its market share is above 30%, because it has the ability to tie must-have data to its

[redacted]

platform and foreclose a substantial portion of competition in the sports betting app technology market.

THE TIE AFFECTS A SIGNIFICANT VOLUME OF COMMERCE IN THE TIED MARKET

152. Ties can be condemned as per se unlawful when they affect more than an insignificant or de minimis volume of commerce. Sports betting app technology generates millions in annual revenues for the Defendants. This volume of commerce is sufficient for per se condemnation of Defendants' tying conduct.

CAUSAL ANTITRUST INJURY

153. As explained above, Genius Sports has implemented various anticompetitive policies and practices with the intent and effect of restricting competition from rivals, including PANDA. By design and in practice, Genius Sports' anticompetitive practices, including its tying conduct, have substantially raised its rivals' costs and erected significant barriers to accessing league data and/or providing competing sports betting app technology. As a result, Genius Sports has been able to hold its competitors at bay, preventing those competitors from achieving efficient scale.

154. Genius Sports' exclusionary conduct has severely restricted PANDA's business opportunities and foreclosed PANDA from a substantial portion of the relevant markets, including by blocking PANDA's ability to do business with most customers. Since Genius Sports began its anticompetitive conduct virtually all customers in the Tied Market have become unavailable to PANDA. On information and belief, and based on conversations with former or formerly prospective customers of PANDA, PANDA believes that customers cannot use PANDA's products because doing so would eliminate their access to the exclusive NFL, NCAA, and Premier League data rights controlled by Genius Sports.

155. On information and belief, Genius Sports has harmed other market participants , and foreclosed competition from numerous actual and potential competitors in the Tied Market. Competitors to Genius Sports include PANDA, Sportradar, IMG Arena, and Stats Perform.

[redacted]

Though these competitors historically competed with Genius Sports, none can meaningfully break into the Tied Markets involving the NFL, NCAA, and Premier League official league data because of Genius Sports' anticompetitive tying arrangements.

156. Genius Sports' tying conduct has led to anticompetitive effects in the Tied Market. Genius Sports' ability to charge supracompetitive prices in the Tied Market stems directly from its anticompetitive conduct, i.e., the possession of exclusive licensed data and the subsequent coercion for customers to use its own infringing app technology as a precondition to access that exclusive licensed data. Genius Sports requires its customers that want to acquire official, live NFL, NCAA, or Premier League data to also purchase its in-play betting app technology. Genius Sports' anticompetitive position continues to become more entrenched as states around the country opt to require sports betting to use only "official" data, thereby requiring customers to work with the only company that has access to such data—Genius Sports. Indeed, Genius Sports conduct has harmed the competitive process as a whole. As intended, Genius Sports has specifically used anticompetitive terms and conditions in agreements to thwart competition from its rivals.

157. The harm to competition in the Tied Market flows directly from Genius Sports' unlawful tying arrangements. The anticompetitive conduct by Genius Sports described herein has caused substantial and ongoing harm to PANDA's business, which constitutes cognizable antitrust injuries. PANDA's injuries flow from the same competition-reducing aspects of Genius Sports' conduct that give rise to such violations.

158. Customers are interested in licensing official, live NFL, NCAA, and Premier League data separately from acquiring sports betting app technology. Further, competitive alternatives to Genius Sports' sports betting app technology—such as PANDA's—are technologically superior, more cost-effective, and, on information and belief, lower priced. PANDA is the original inventor of the technology that Genius Sports is infringing, and its sports betting app technology offers industry-leading flexibility and advanced capabilities. For example, PANDA's technology can be fully integrated into a sportsbook's platform, seamlessly embedded

within a sportsbook's media partners' publishing platforms, or both simultaneously. This pioneering capability allows sportsbooks not only to enhance their own platform but also to unlock new customer acquisition channels, drive betting revenue, and maximize the value of their media partnerships to reach millions of potential bettors—all with virtually no additional effort.

159. But for Genius Sports' anticompetitive conduct, PANDA's innovative platform would have succeeded in generating substantially more business and profit, and the total harm done to PANDA's business because of such practices will be reasonably ascertainable through proof to be submitted at trial. For example, prior to Genius Sports' anticompetitive tying, PANDA was successfully doing business with many customers in the Tied Market, including Many of these customers—and indeed even potential competitors like Genius Sports—praised PANDA's sports betting app technology. For example, in 2018, Genius Sports' Director of Sports Partnerships, Ben Turner, PANDA did (and still does) have the ability and scale to meet the demands of any customers seeking PANDA's sports betting app technology, and meet or exceed the offerings of its competitors. However, PANDA's business rapidly dwindled once Genius Sports began imposing its anticompetitive tying, and former customers and prospective customers could not do business with PANDA's sports betting app technology because doing so would eliminate their access to the exclusive NFL, NCAA, and Premier League data rights controlled by Genius Sports.

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

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

161. Defendants have infringed and continue 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.

162. 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.

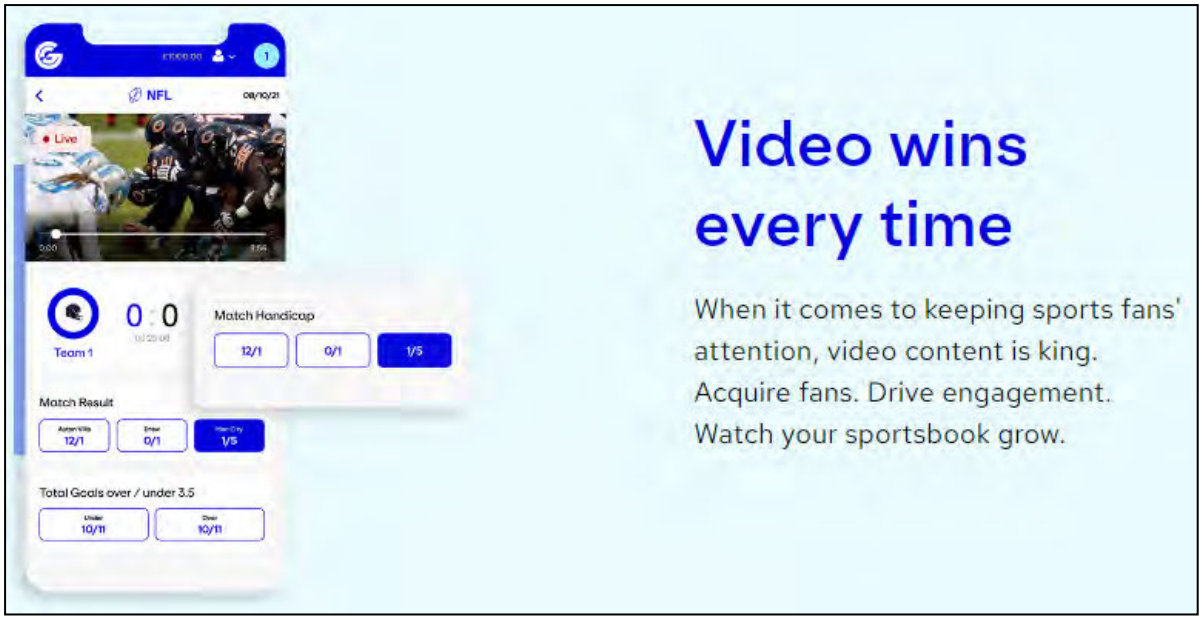
[redacted]

163. 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.

164. 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.).

[redacted]



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

165. 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.)

166. As described below, Genius Sports delivers "thousands of low latency live

[redacted]

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.

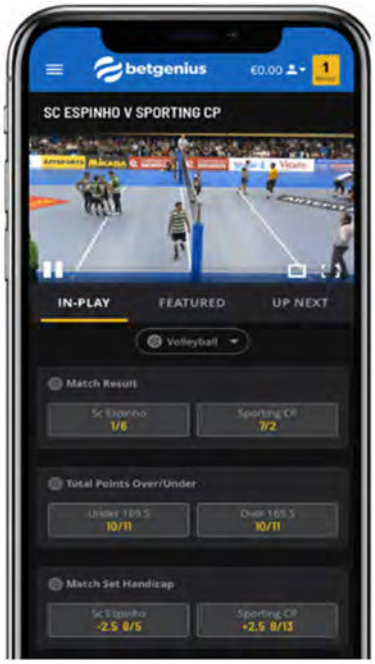
Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipsport will have access to Genius Sports' full NFL product suite, including access to the league's 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.

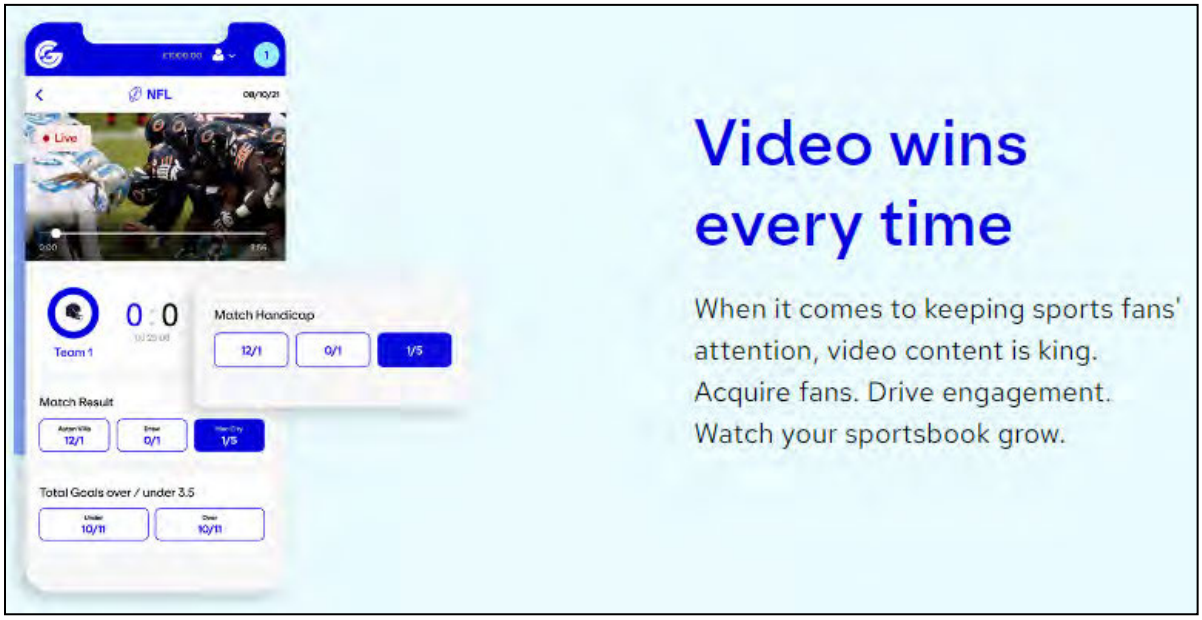
(S*ee* PANDA_000176-PANDA_000177, https://geniussports.com/newsroom/genius-sports-builds-out-official-data-trading-and-live-streaming-partnership-with-tipsport/.) Genius Sports is also the NFL's official data distributor, providing low-latency video feeds of live sporting events and allowing fans to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

167. 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.

[redacted]



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

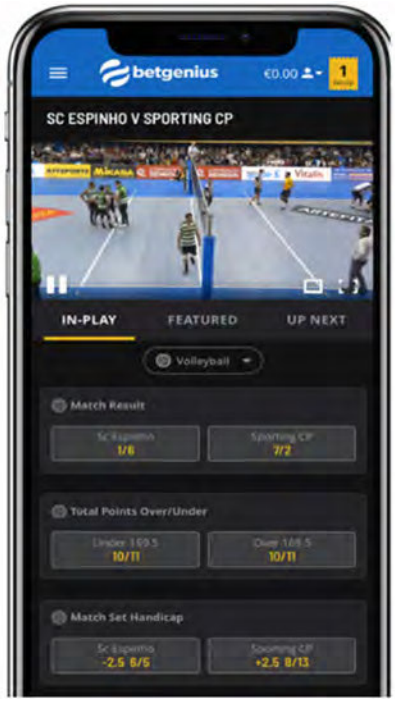


(*See* PANDA_000055 at PANDA_000057, https://www.geniussports.com/sportsbook/streaming/.)

168. 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*

[redacted]

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.



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

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

[redacted]

> ***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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> 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.
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> 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."

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

170. 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.

171. <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

[redacted]

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:

```
<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 -->
```

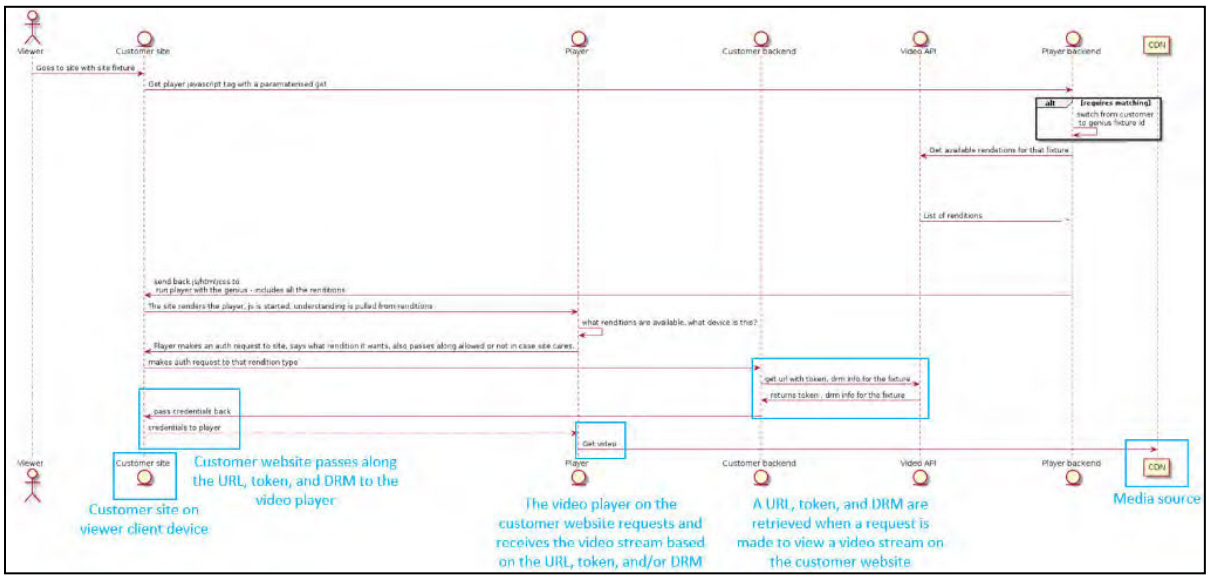
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

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.)

[redacted]

172. 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

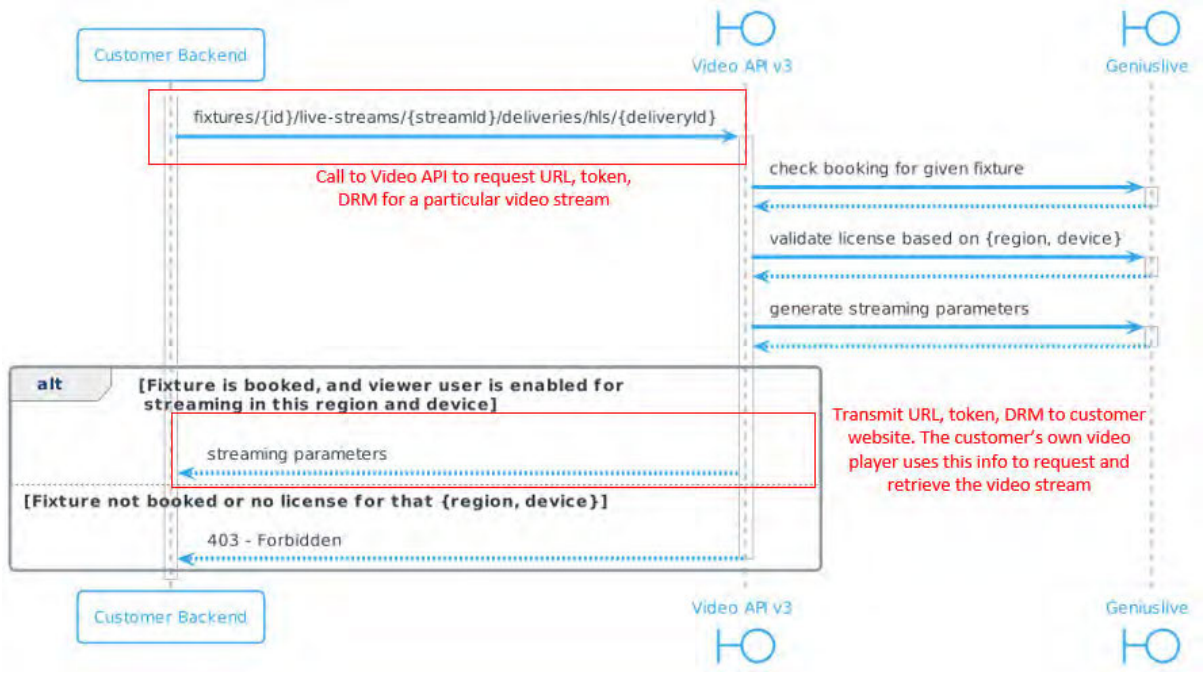
You will need to add the necessary logic in your web site to call your backend to retrieve the schedule and the streaming parameters described before. Also, you will need to integrate a player in your site that can apply CDN token authentication. For specific competitions your player will also have to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

[redacted]



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

173. 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."

[redacted]

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.

(*See* 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+-

[redacted]

+User+Manual.)

174. 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.)

175. Genius Sports also 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.

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

176. The Accused Products include *at least one socket server communicatively coupled*

[redacted]

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.)

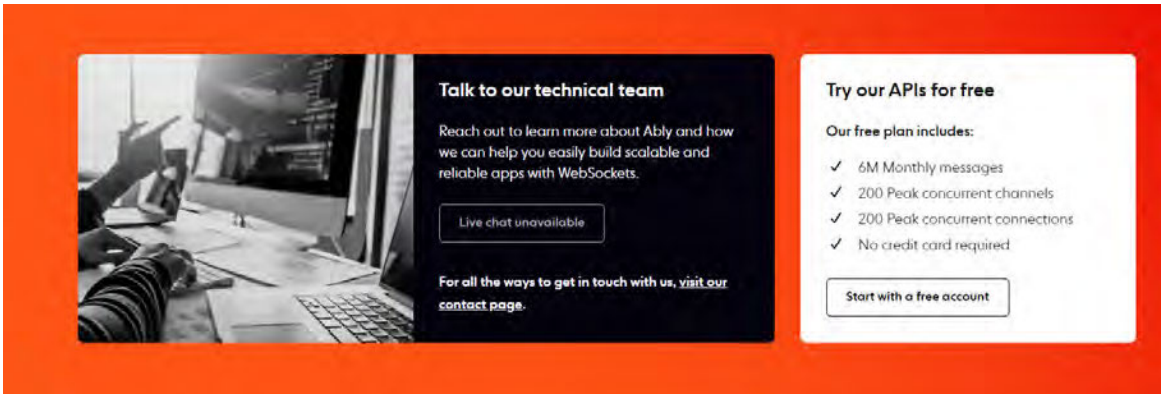
177. In addition, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

[redacted]

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.)

178. 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*

[redacted]

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.

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

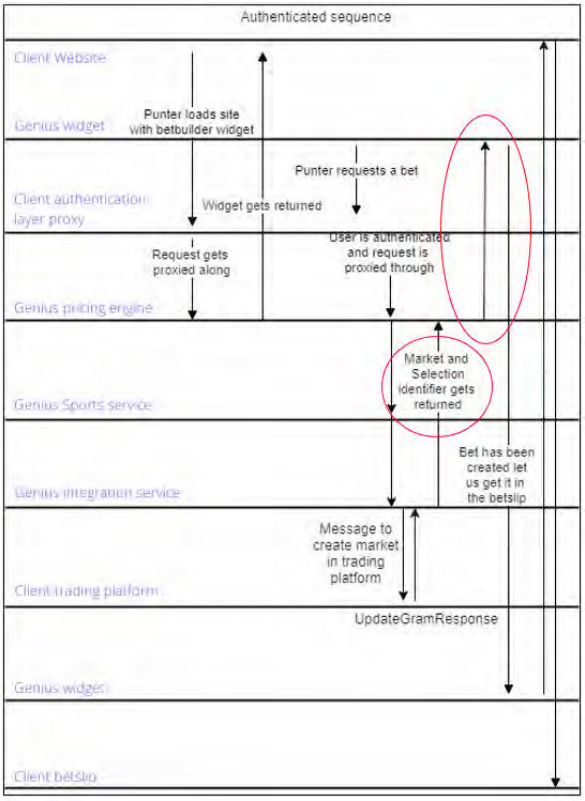
> Please note that latest platform response for each unique Multibet market will be stored on Genius Sports' system in order to be re-used for subsequent bets.

(*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.)

179. In addition, the Accused Products transmit at least the bet generated by the

[redacted]

sportsbook's trading platform to Genius widget on client's device, via the Internet.



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

180. 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.

[redacted]

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.

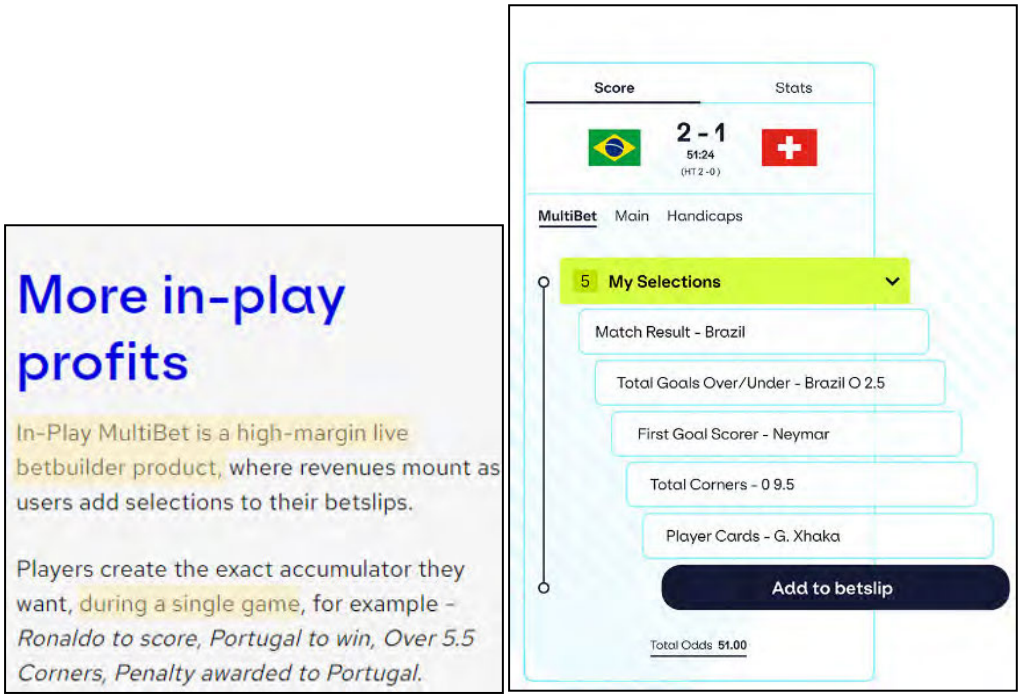
```
<iframe scrolling="no" id="betgenius-iframe" src="https://bs
```

(*See* PANDA_000077-PANDA_000078,

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

[redacted]

181. 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.



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

[redacted]

- 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.

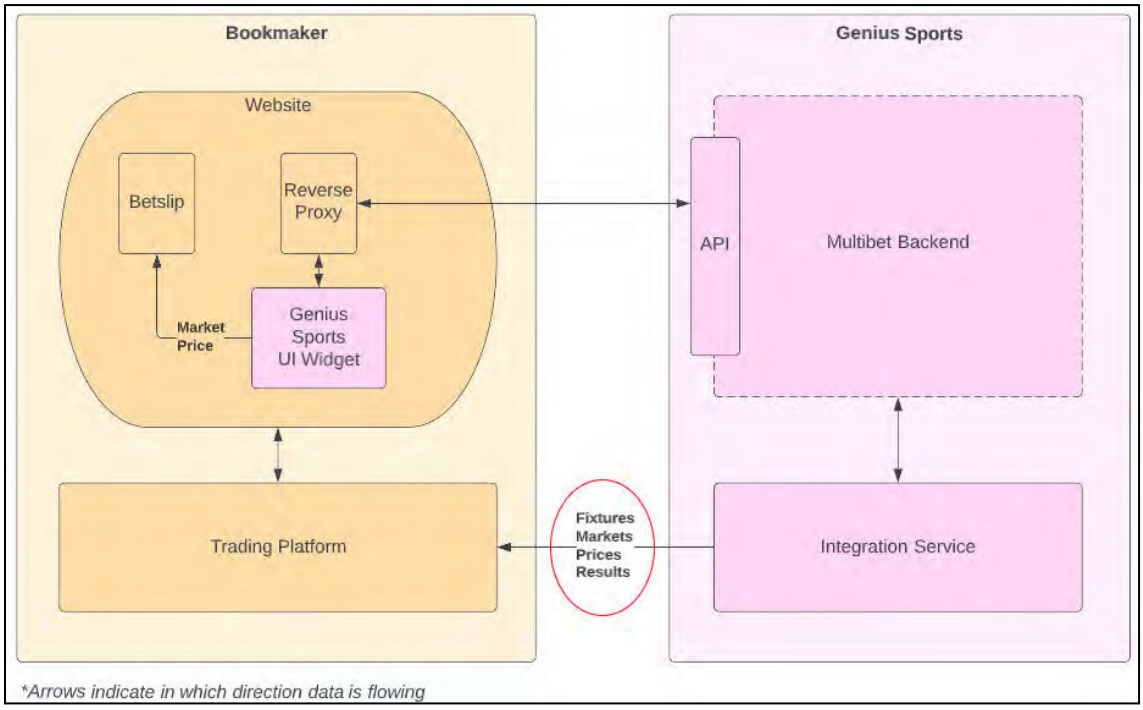
InPlay MultiBet will also be available across the NFL, English Premier League, Liga MX, and dozens of FIBA basketball and FIVB volleyball leagues worldwide.

"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/.)

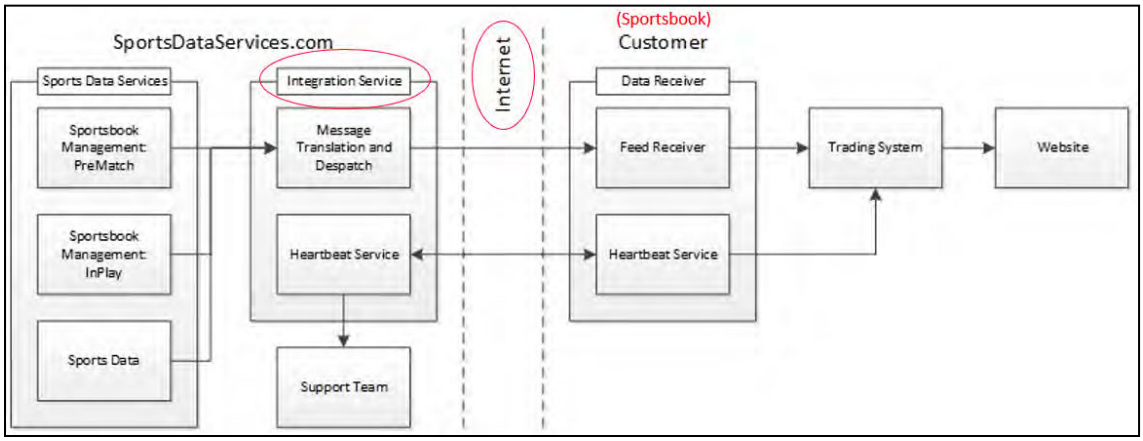
182. During operation, Genius Sport's Integration Service (provided by Sportsbook Integration (V3)) transmits various data (fixtures, markets, prices, results) to the sportsbook's trading platform via an Internet connection. Additionally, the Integration Service transmits a message to create a market (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.

[redacted]



(*See* PANDA_00212 at PANDA_00213,

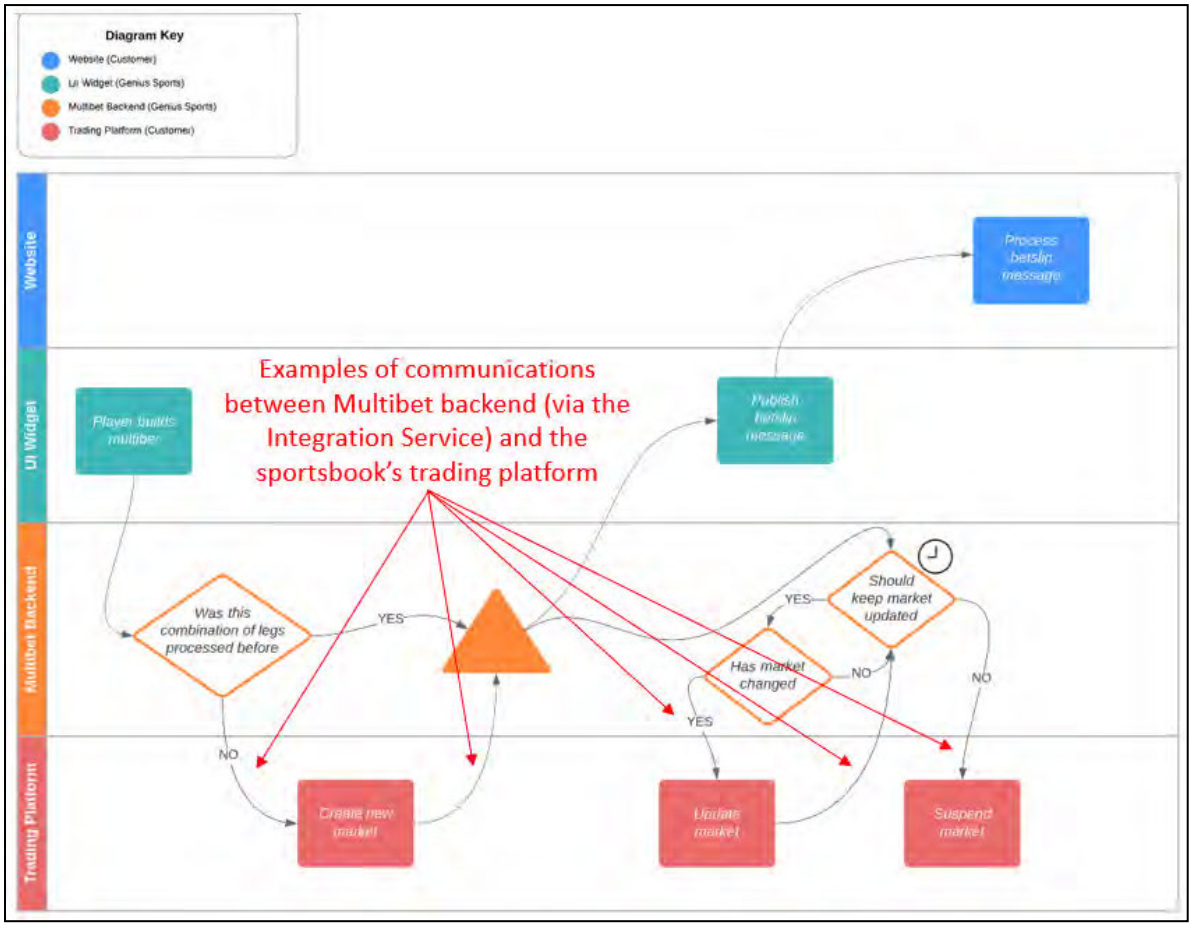
https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664027/Multibet+Back-End+Integration.)



(*See* PANDA_000539,

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

[redacted]



183. 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.

[redacted]

184. 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.)

185. 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.

[redacted]

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.

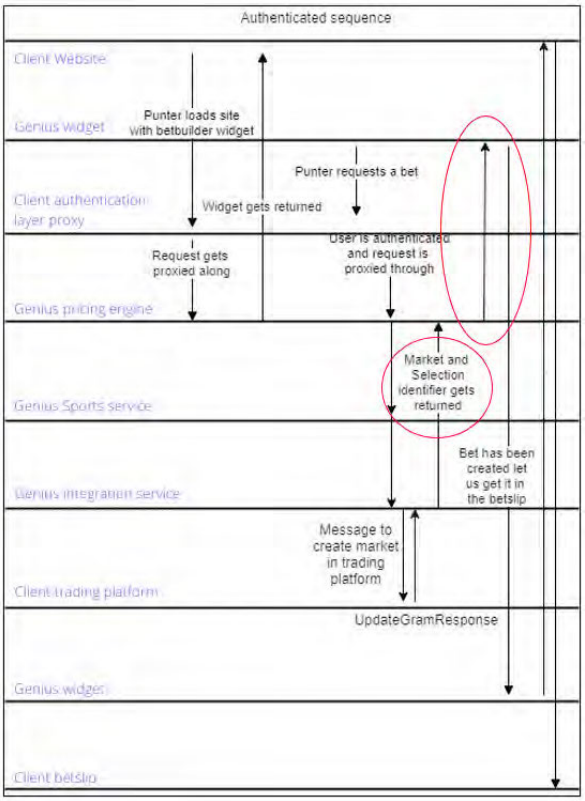
(*See* PANDA_000065, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> 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.)

187. 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.

[redacted]



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

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.

[redacted]

(*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.)

189. 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.

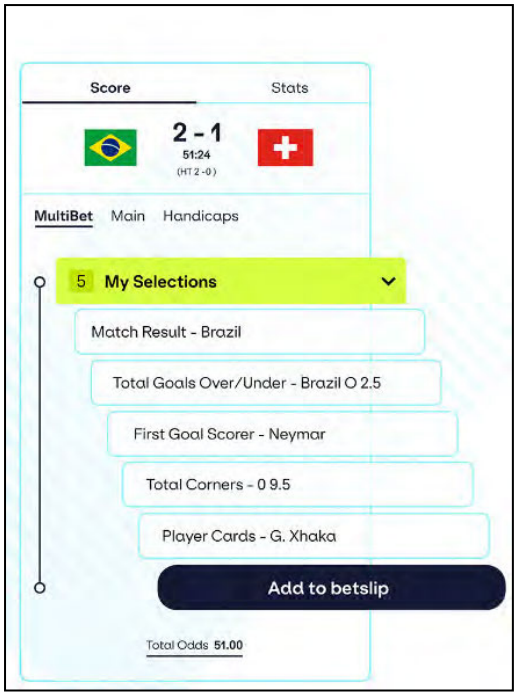
190. As shown in the screenshots below, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.

[redacted]

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."

[redacted]

(*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/.)

191. 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.

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

193. Defendants directly infringe 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.

194. Defendants’ 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.

195. Defendants have 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 their acts induce infringement, in violation of 35 U.S.C. § 271(b). For example, Defendants encourage and induce 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,

[redacted]

installation, support, and distribution of the Accused Products.

196. Defendants encourage, instruct, direct, and/or require third parties—including its certified partners and/or customers—to use the Accused Products in infringing ways.

197. Defendants further encourage and induce 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 their video streaming software, and services in the United States.

198. Further, as the entities 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, Defendants and/or their partners affirmatively aid and abet each customer’s use of the Accused Products in a manner that infringes the ’687 Patent.

199. Defendants also contributes to the infringement of their 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

[redacted]

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.

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 ’687 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 Defendants 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.

203. On information and belief, the infringing actions of each partner, customer, and/or end-user of the Accused Products are attributable to Defendants. For example, on information and belief, Defendants direct and control the activities or actions of their partners or others in connection with the Accused Products by contractual agreement or otherwise requiring partners

[redacted]

or others to provide information and instructions to customers who acquire the Accused Products which, when followed, results in infringement. Defendants further direct and control 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.

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

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

206. Defendants’ infringement of the ’687 Patent is knowing and willful. Defendants 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 Defendants by sending a letter on October 4, 2023, informing Defendants of their infringement of the ’687 Patent.

207. On information and belief, despite Defendants’ knowledge of the Asserted Patents and Plaintiff’s patented technologies, Defendants made the deliberate decision to sell products and services that they knew infringe the ’687 Patent. Defendants’ continued infringement of the ’687 Patent with knowledge of the ’687 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 4.

[redacted]

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

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

210. Defendants have 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.

211. 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

[redacted]

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

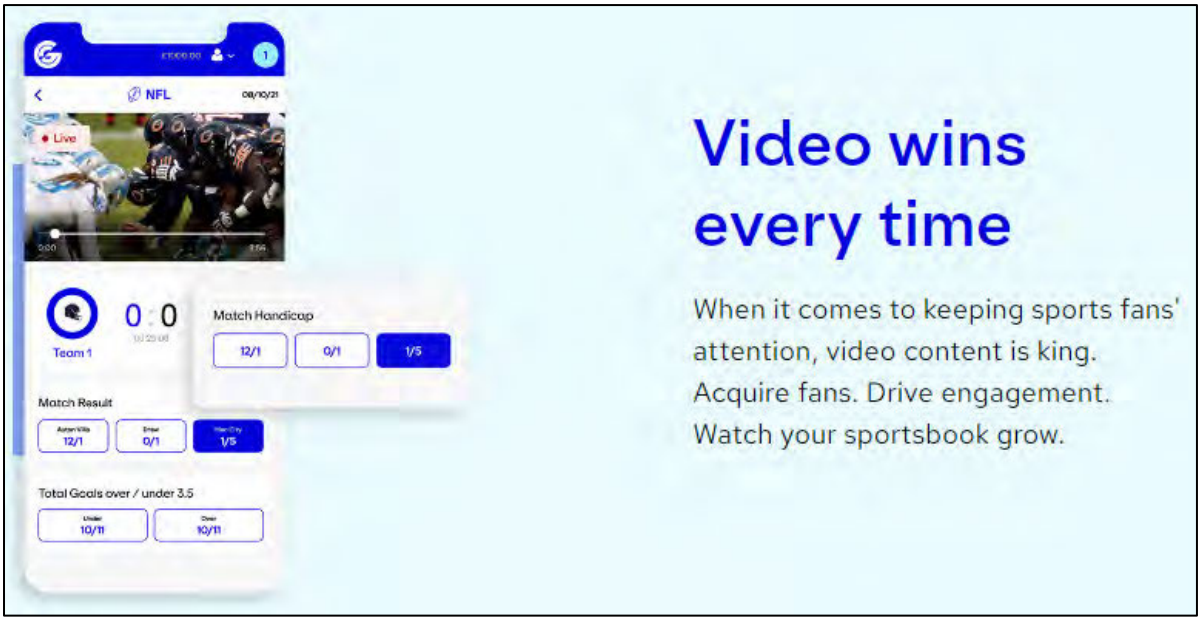
212. Claim 4 of the ’218 Patent, which depends from claim 1, recites:

> 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.

213. 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*.

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

[redacted]



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

215. 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,

[redacted]

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.

216. 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.)

[redacted]

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.)

217. 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.

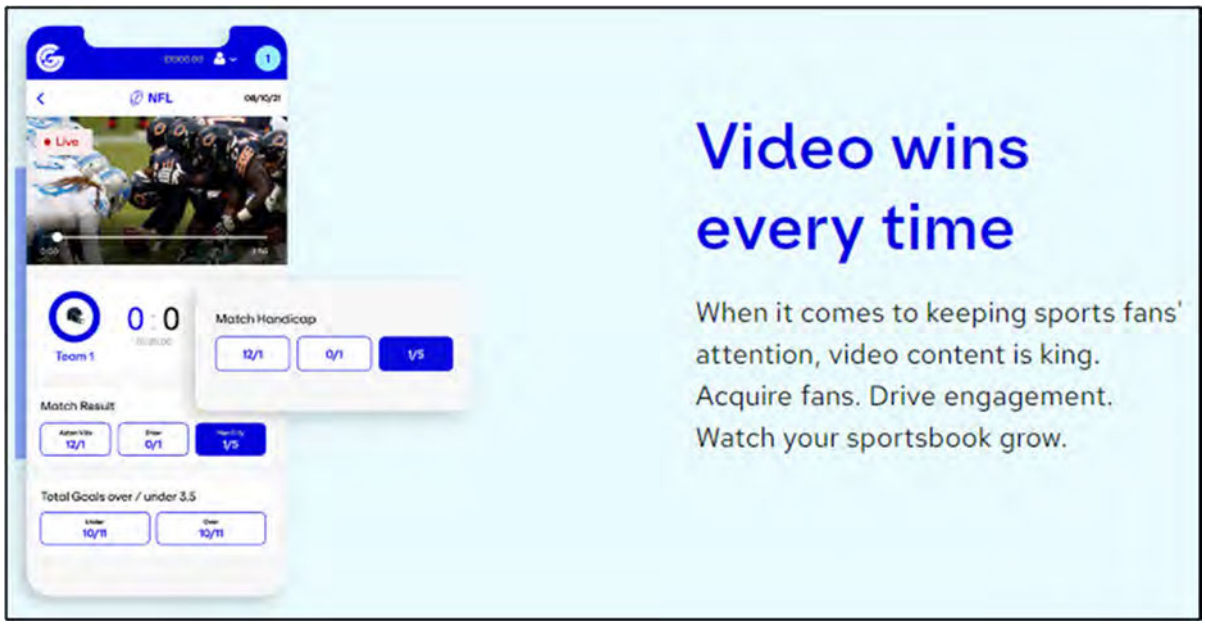
Jack Davison, Chief Commercial Officer at Genius Sports Group, said: "Our close relationships with sports rights holders across the world have given us access to new, high quality streaming content which will significantly enhance our sportsbook partners' in-play products.

"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-

[redacted]

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



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

218. 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.

[redacted]

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.)

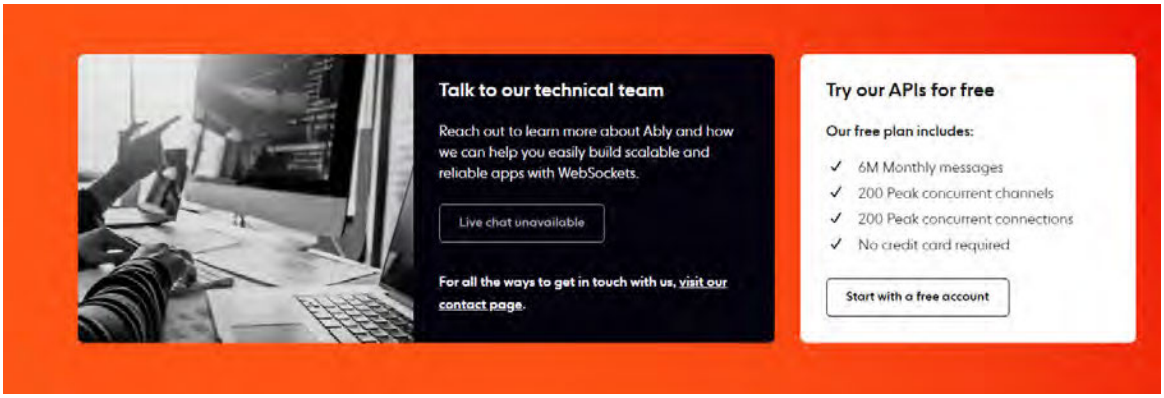
219. In addition, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

[redacted]

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.)

220. 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*

[redacted]

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.

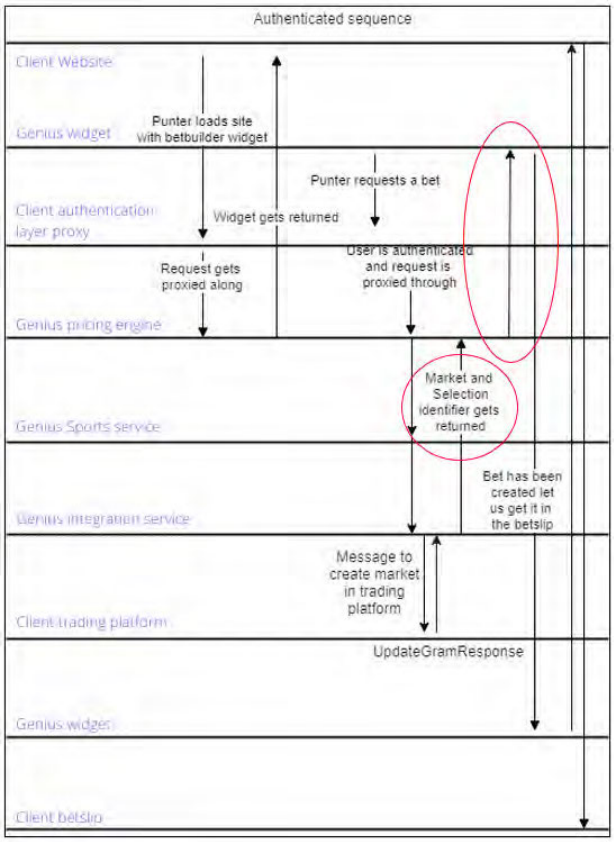
(*See* PANDA_000065, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> 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.)

221. 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.

[redacted]



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

222. 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.

[redacted]

(*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.)

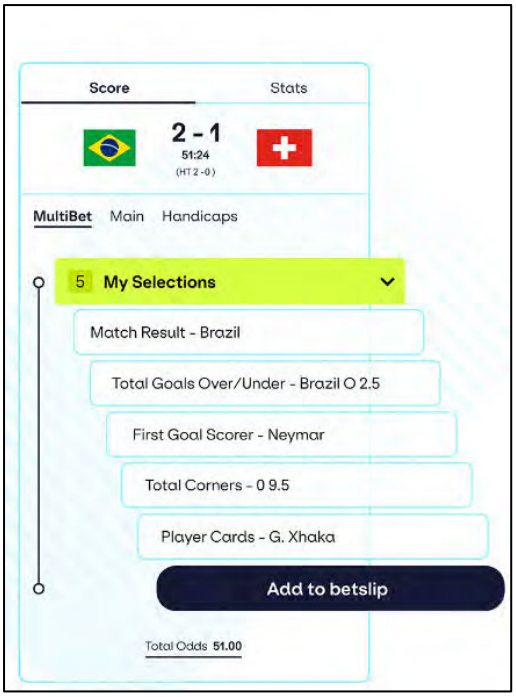
223. As shown in the screenshots below, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.

[redacted]

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.

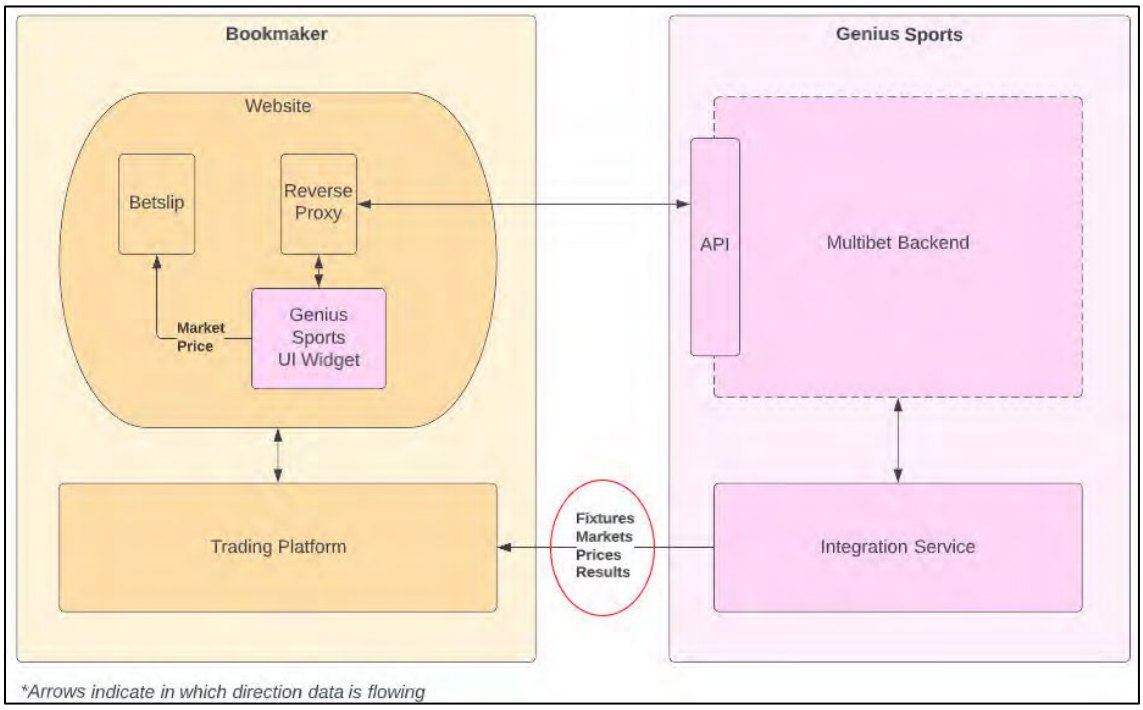
InPlay MultiBet will also be available across the NFL, English Premier League, Liga MX, and dozens of FIBA basketball and FIVB volleyball leagues worldwide.

"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."

[redacted]

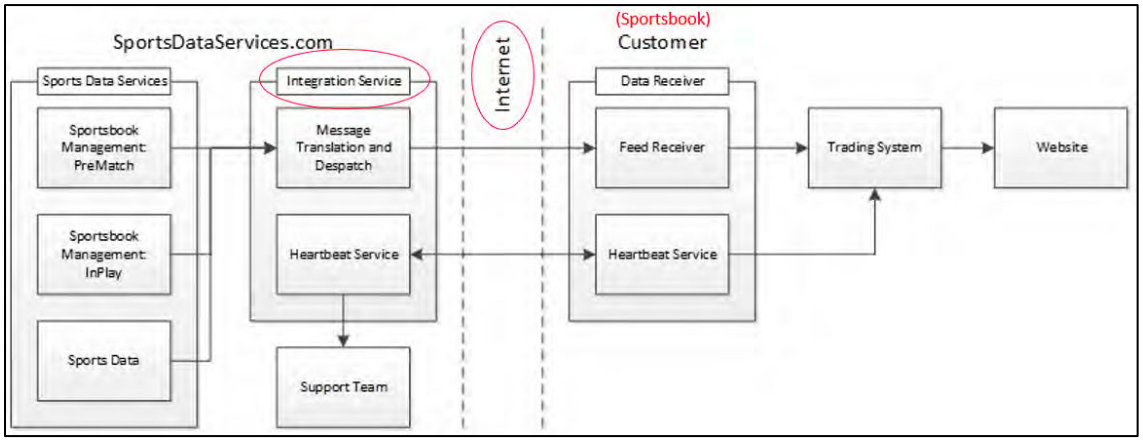
(*See* PANDA_000179-PANDA_000180, https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/.)

224. 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.



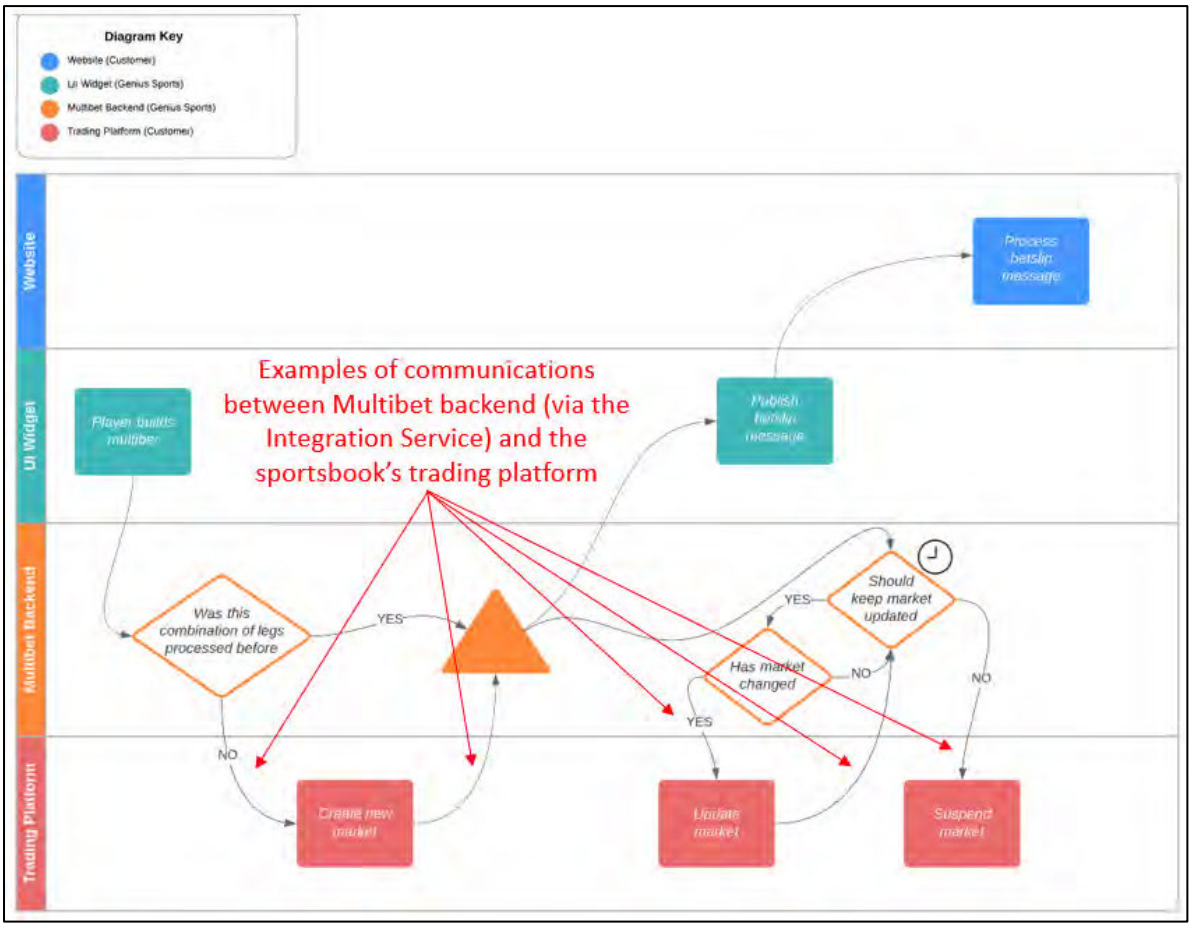
(*See* PANDA_00212 at PANDA_00213, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664027/Multibet+Back-End+Integration.)

[redacted]



(*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.)

[redacted]

225. 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.

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.

[redacted]

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.)

226. 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*.

227. 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."

[redacted]

(*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,

[redacted]

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

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.)

228. 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

[redacted]

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.

229. 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

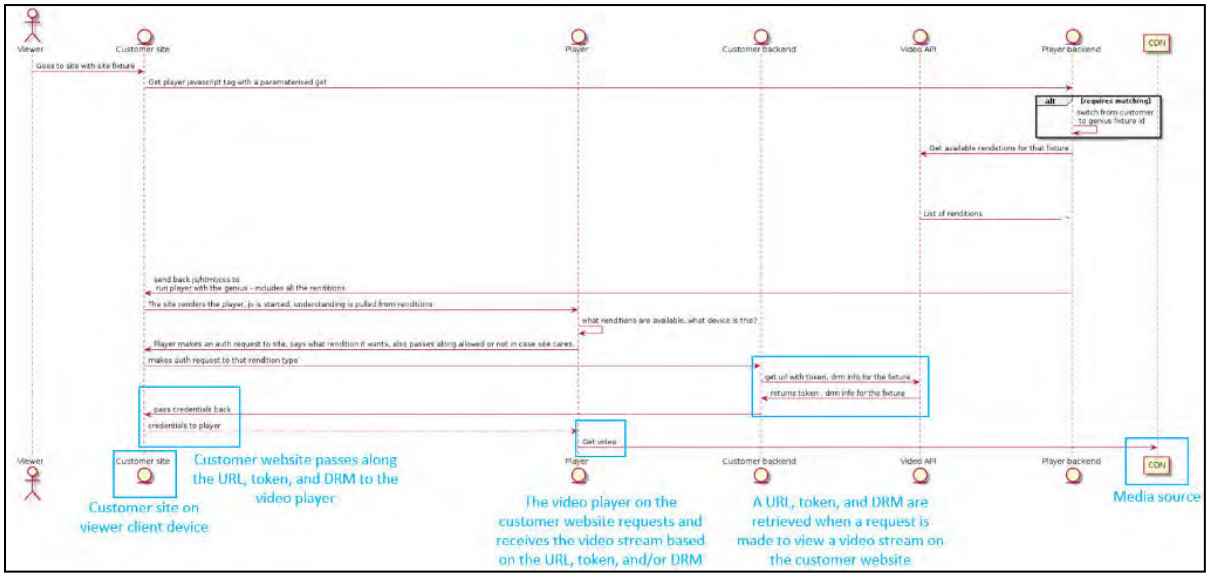
How does it work?

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.

[redacted]



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

230. <u>Option (2): Video API:</u> 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.

[redacted]

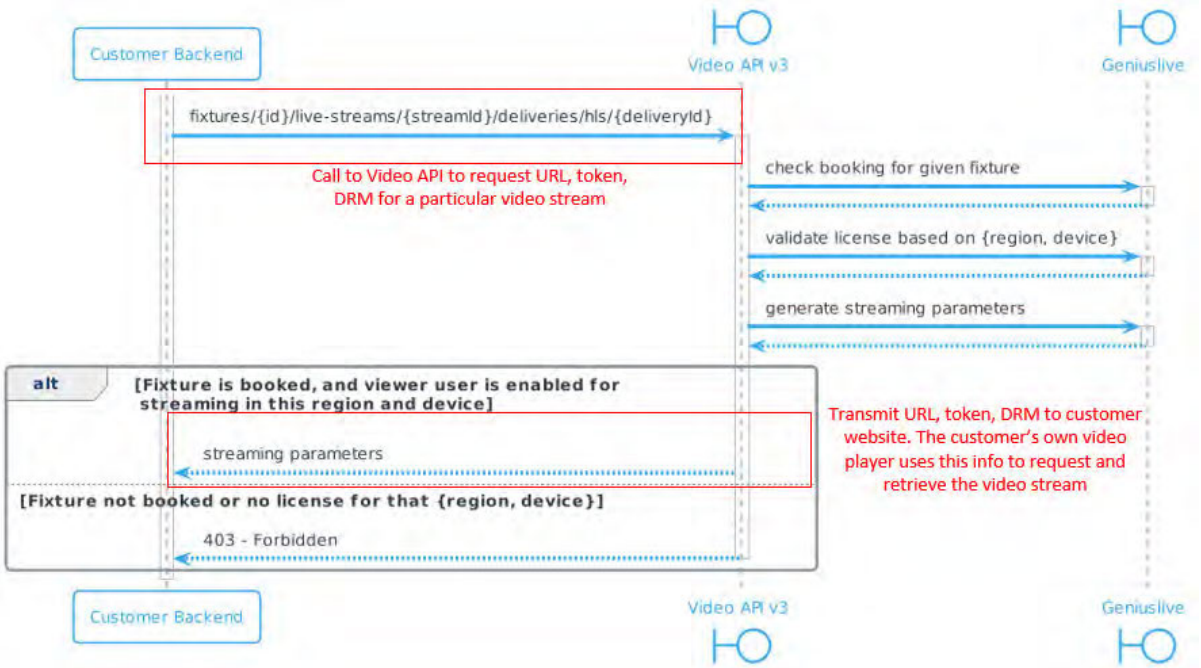
Player integration

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.)

231. 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.

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

[redacted]

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

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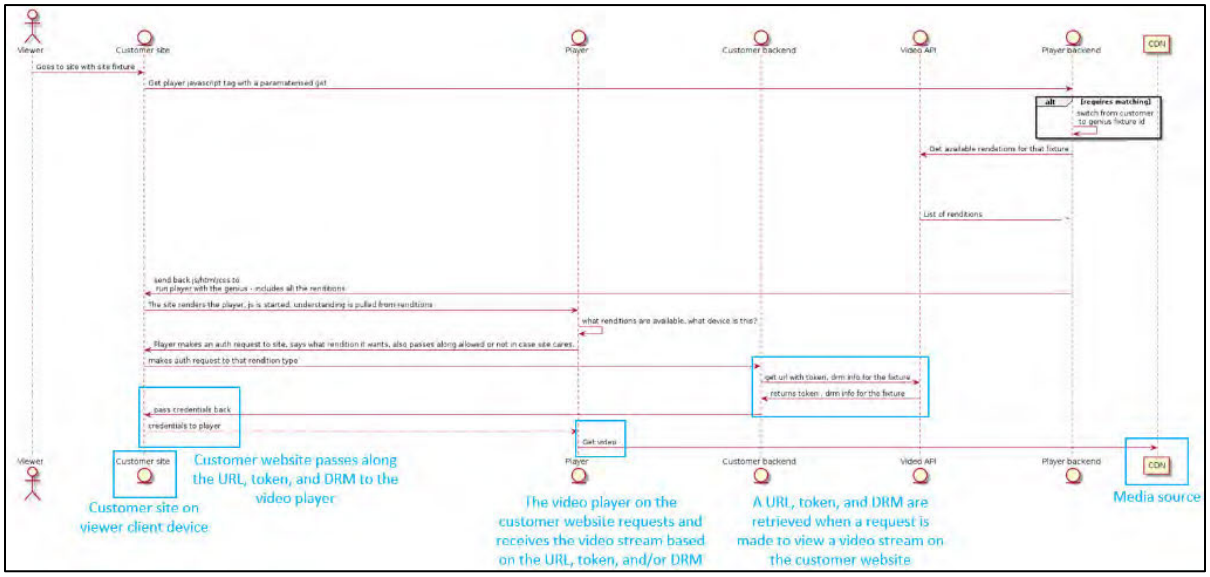
[redacted]



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

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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,

[redacted]

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

233. 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."

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
```

(S*ee* PANDA_000139-PANDA_000141,

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

234. 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*

[redacted]

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.)

235. 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.

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

237. Defendants directly infringe 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.

[redacted]

238. Defendants' 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.

239. Defendants have 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, Defendants encourage and induce 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.

240. Defendants encourage, instruct, direct, and/or require third parties—including their certified partners and/or customers—to use the Accused Products in infringing ways.

241. Defendants further encourage and induce their 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 their video streaming software, and services in the United States.

242. 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, Defendants and/or Defendants' partners affirmatively aid and abet each customer's use of the Accused Products in a manner that infringes the '218 Patent.

[redacted]

243. Defendants also contributes to the infringement of their 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.

244. 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.

245. 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.

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

[redacted]

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.

247. 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, Defendants direct and control the activities or actions of their 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. Defendants further direct and control 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.

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

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

[redacted]

250. Defendants' infringement of the '218 Patent is knowing and willful. Defendants 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 Defendants by sending a letter on October 4, 2023, informing Defendants of their infringement of the '218 Patent.

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

252. 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)

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

254. Defendants have infringed and continue 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.

255. 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.

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

20. The system of claim 19, wherein:

[redacted]

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:

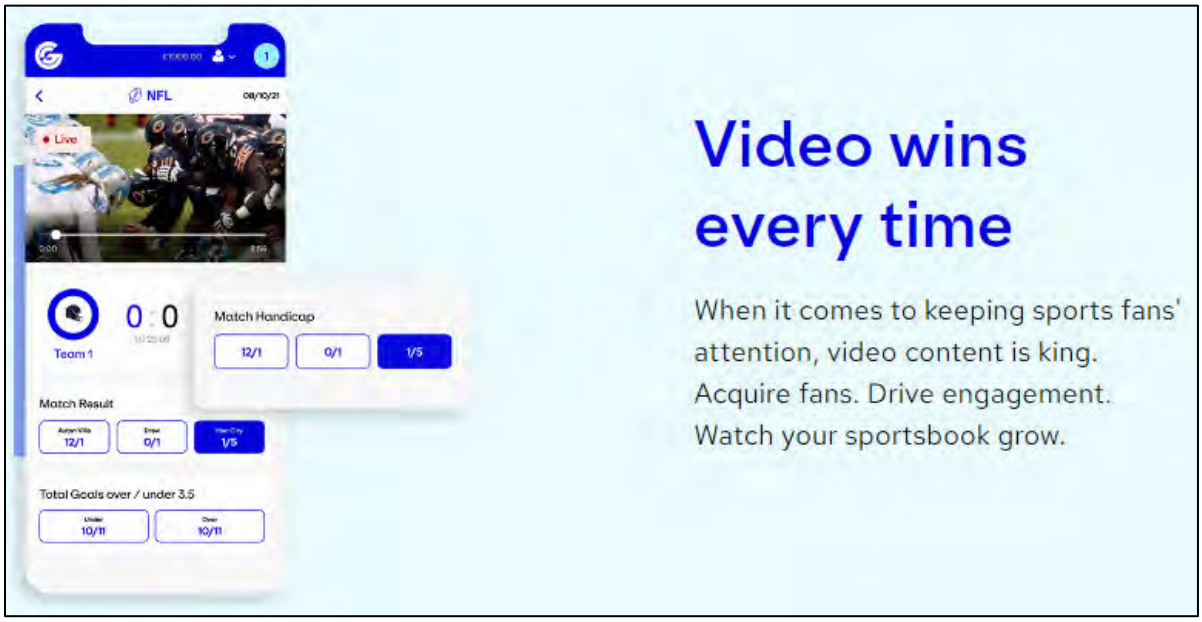
> transmits at least the first score information of the first event information to the second viewer client device of the first plurality of viewer client devices via a third event information Internet communication channel between the at least one first event socket of the at least one socket server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

257. 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

[redacted]

event.



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

258. 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…."

[redacted]

> ***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.)

259. 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.

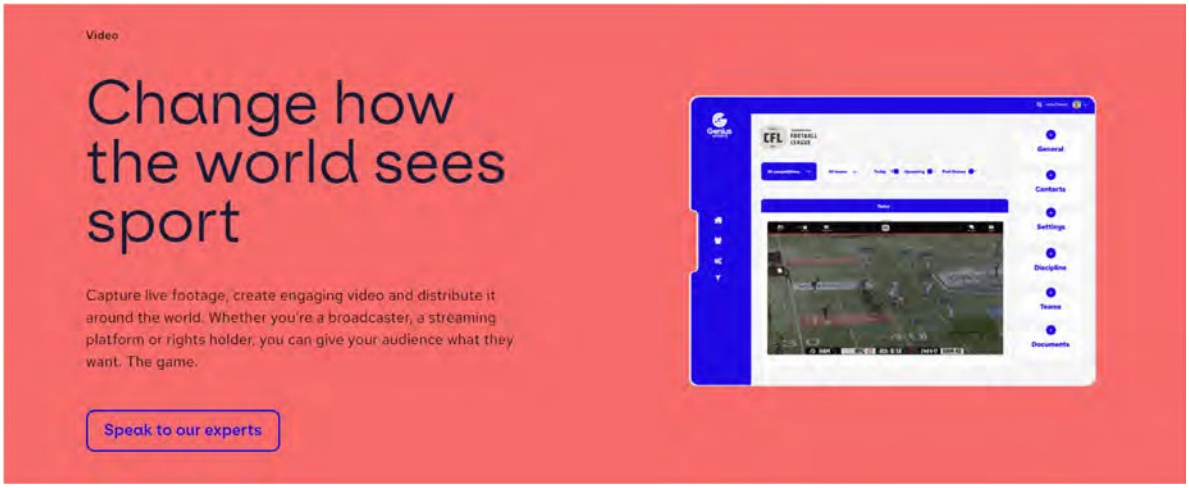
> Genius Sports Limited ("Genius Sports"), the official data, technology and broadcast partner that powers the ecosystem connecting sports, betting and media, has agreed to a major expansion of its long-term partnership with Tipsport, a leading Czech sportsbook operator across retail and online.
>
>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

[redacted]

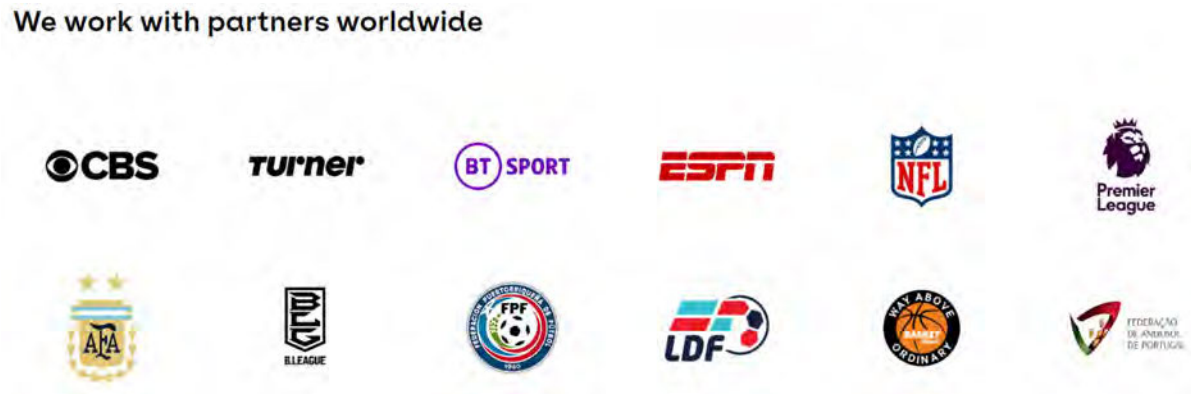
the United States.

260. 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/.)

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

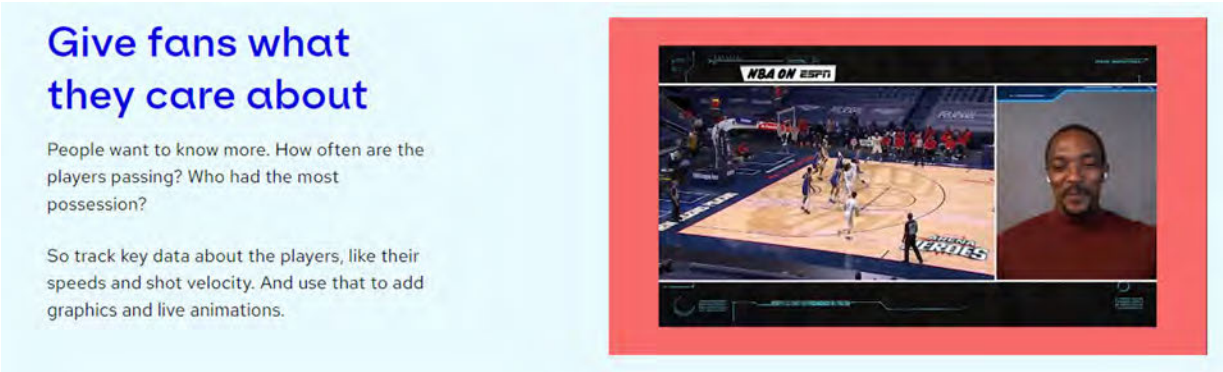


(*See* PANDA_000069 at PANDA_000074-75, https://geniussports.com/video/.)

[redacted]

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

262. 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.



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

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

[redacted]

BT Sport augments broadcasts with tracking data

Genius SPORTS | BT SPORT

(*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/.)

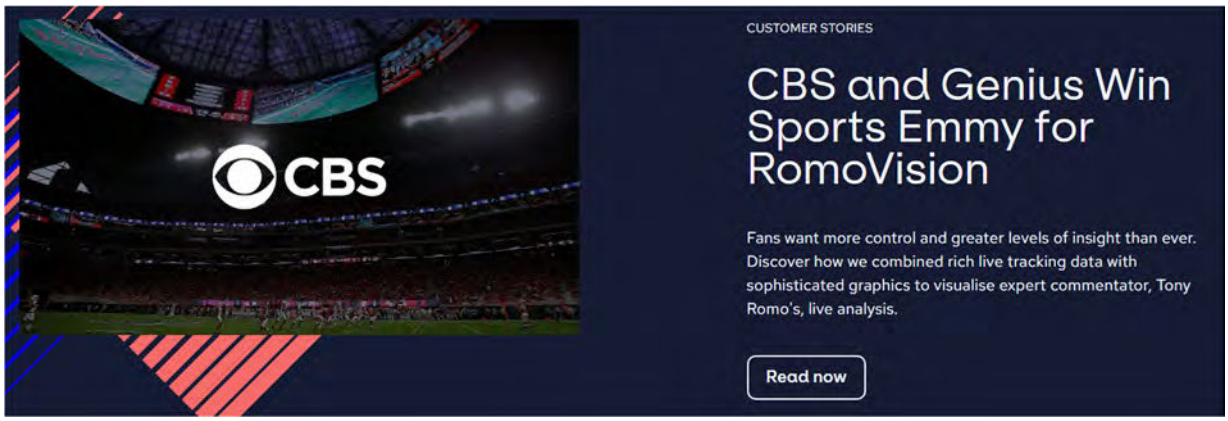
Bring sports stories to life

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

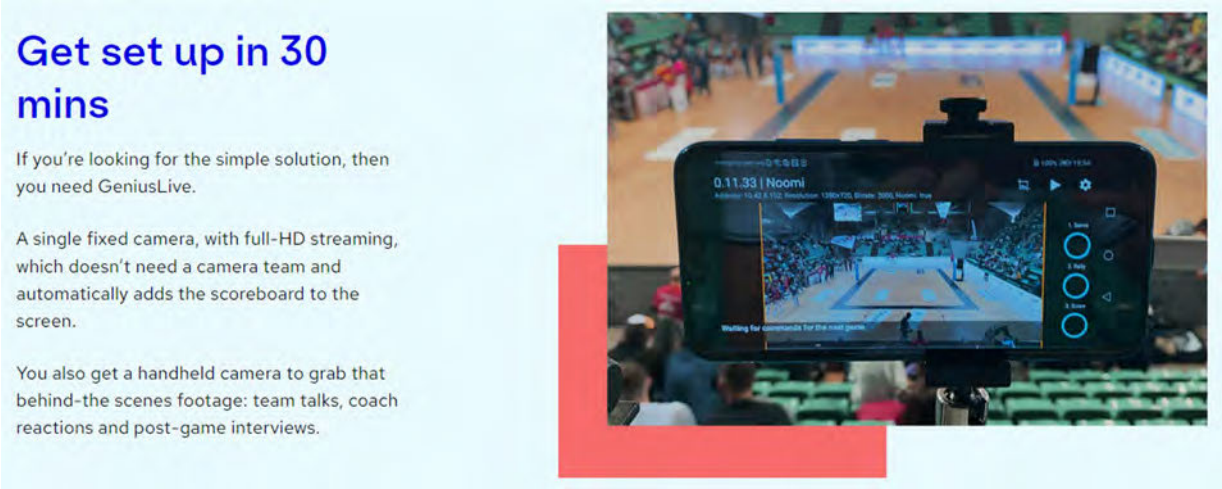
- Split-second shot probabilities
- Distance to three-pointers
- Real-time player speeds
- Shot velocity
- And much more

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

[redacted]



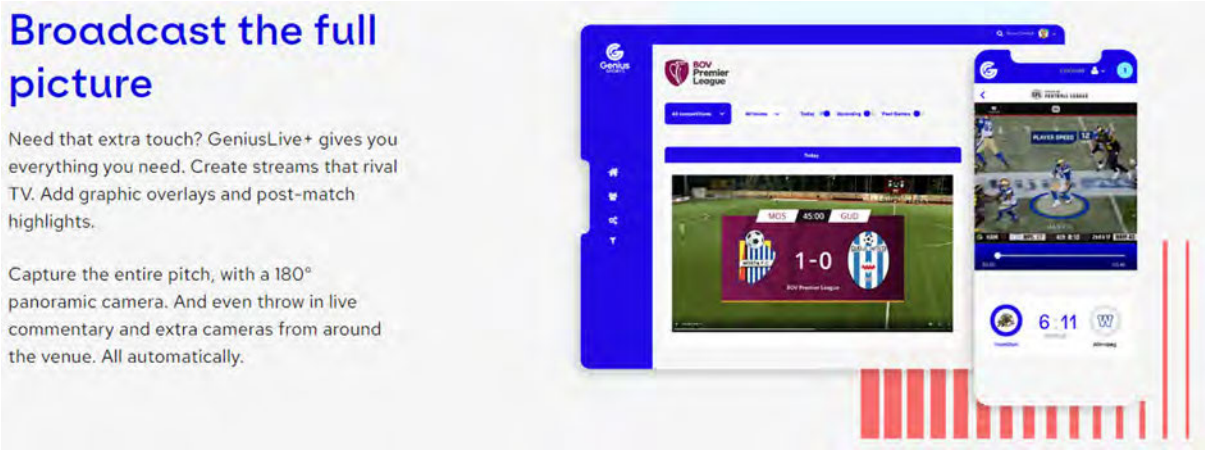
(*See* PANDA_000496 at PANDA_000497, https://geniussports.com/publishers-broadcasters/.)



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

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

[redacted]



(*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.

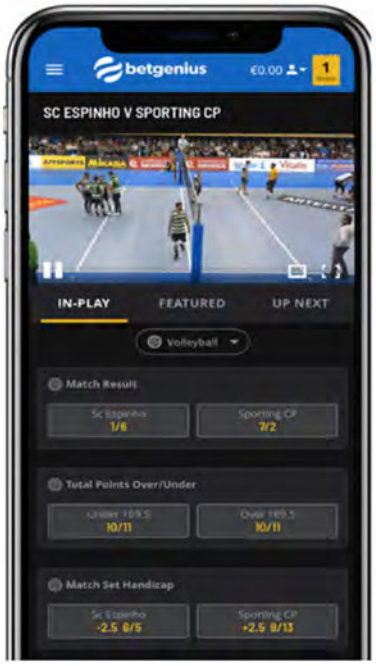
As a first of its kind in the U.S., Caesars Sportsbook will offer official data-driven in-game betting opportunities and player props alongside live video streams of NFL games to give their customers access to the most compelling in-play NFL betting experience available for mobile and tablets. In addition, 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-

[redacted]

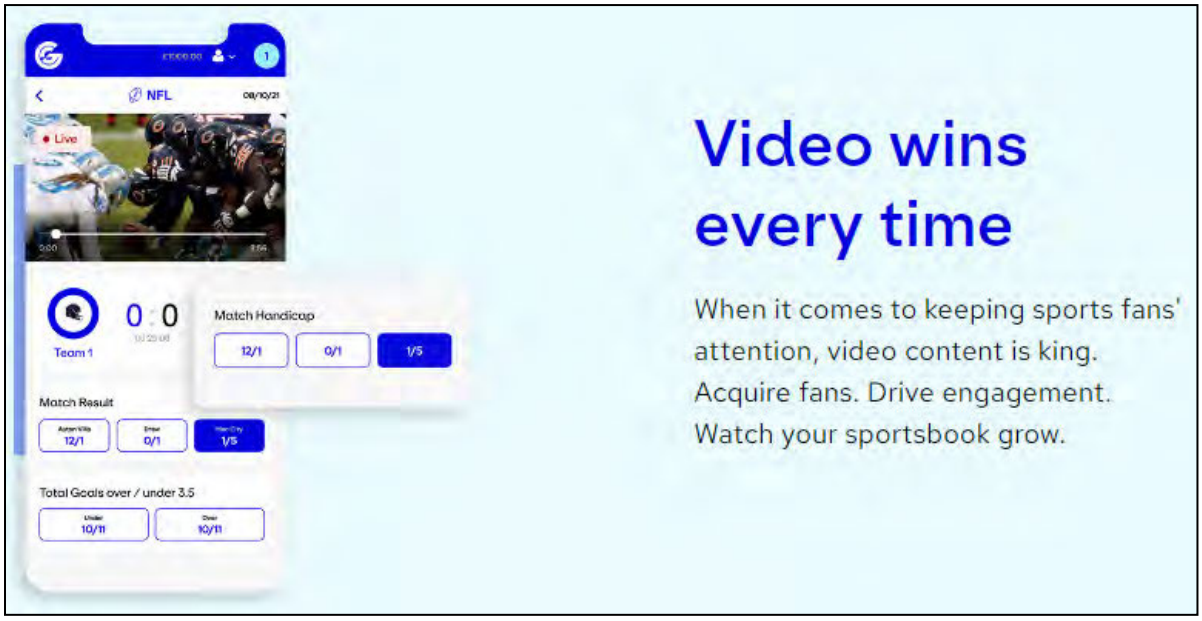
starting-with-caesars-entertainment/.)

263. 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.



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

[redacted]



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

264. 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.*

265. 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…."

[redacted]

> ***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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> 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.
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> 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.)

266. 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.

267. <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

[redacted]

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 -->
```

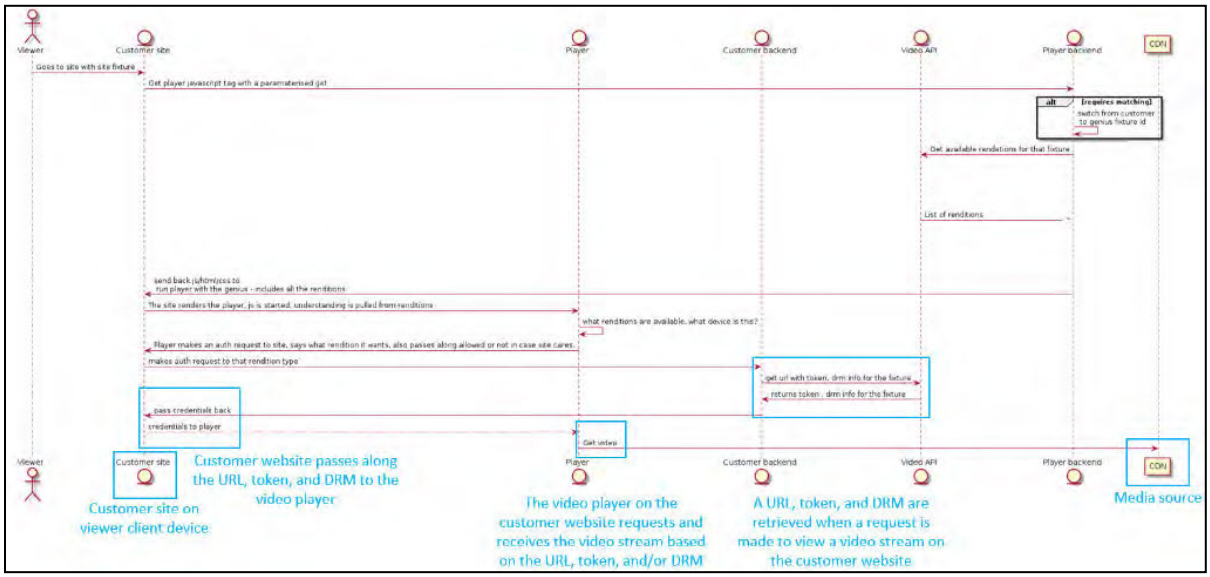
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

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.)

[redacted]

268. 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

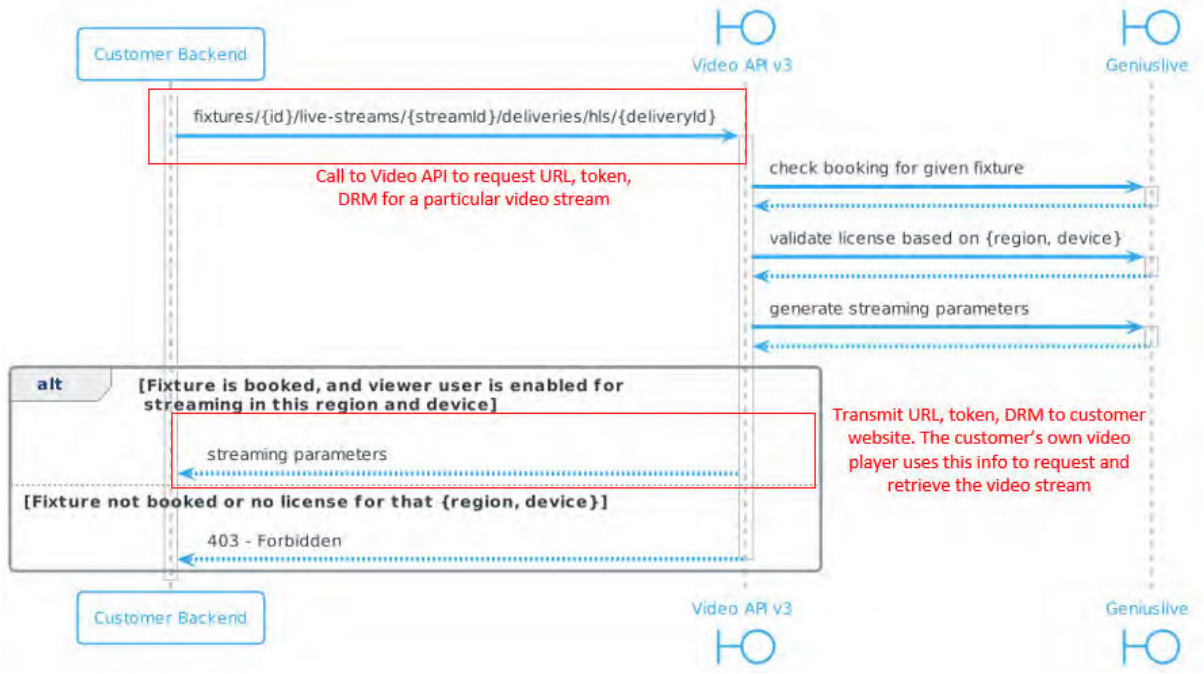
You will need to add the necessary logic in your web site to call your backend to retrieve the schedule and the streaming parameters described before. Also, you will need to integrate a player in your site that can apply CDN token authentication. For specific competitions your player will also have to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

[redacted]



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

269. 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."

[redacted]

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.

(*See* 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

[redacted]

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

270. 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.

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

271. 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."

[redacted]

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.)

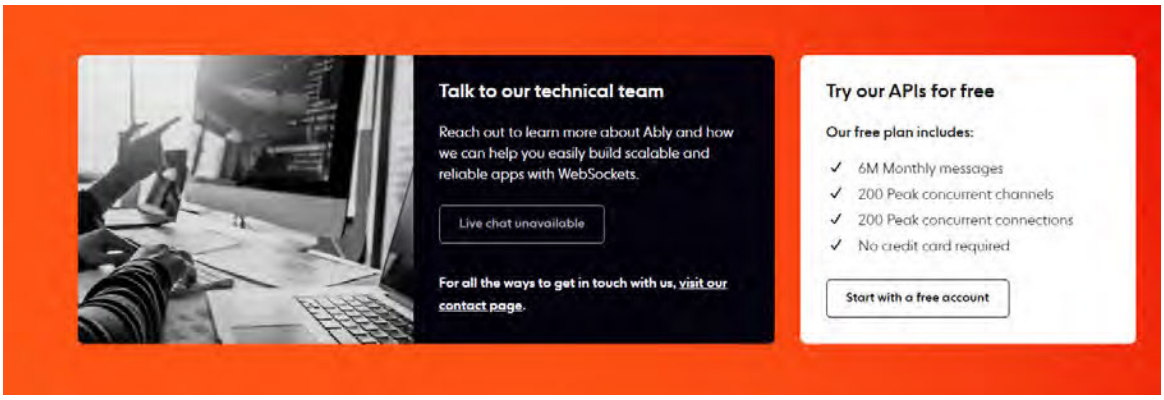
272. In addition, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

[redacted]

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)

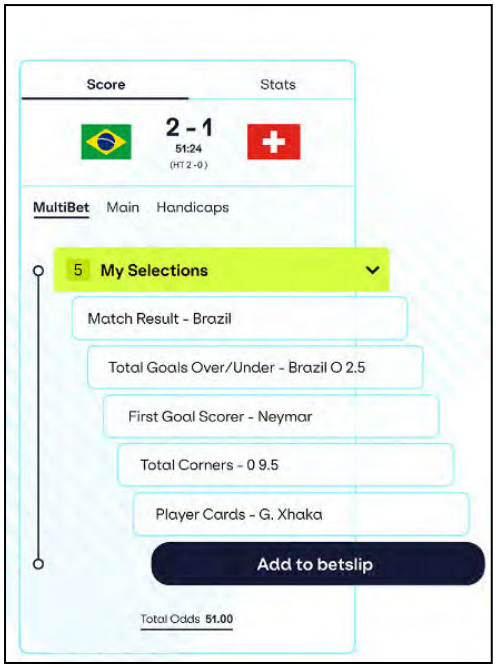
273. In addition, Genius Sports transmits at least the soccer game score, total goals over/under, total corners, first goal scorer, player cards, etc. to viewers.

[redacted]

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.

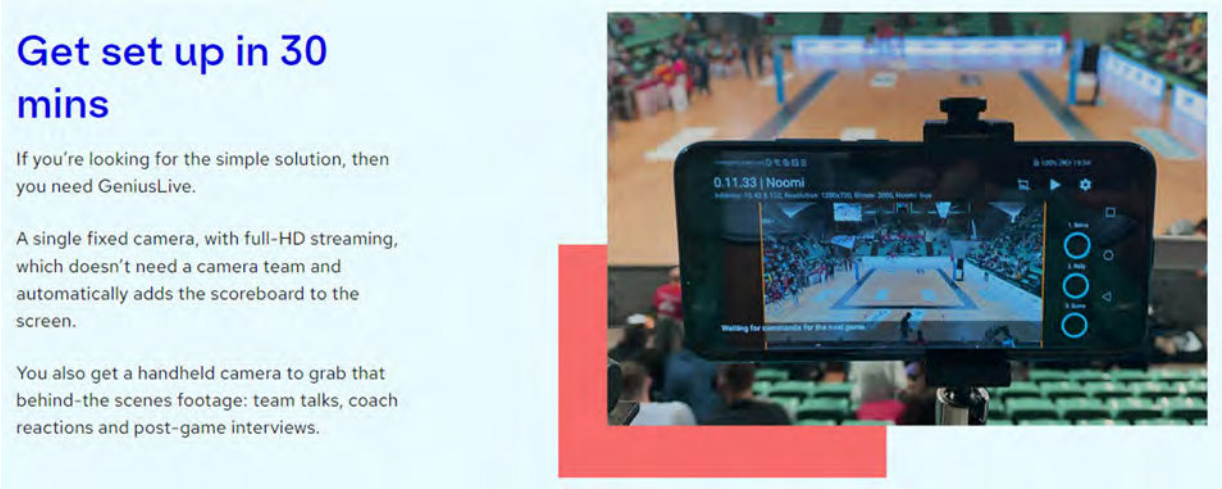
Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

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

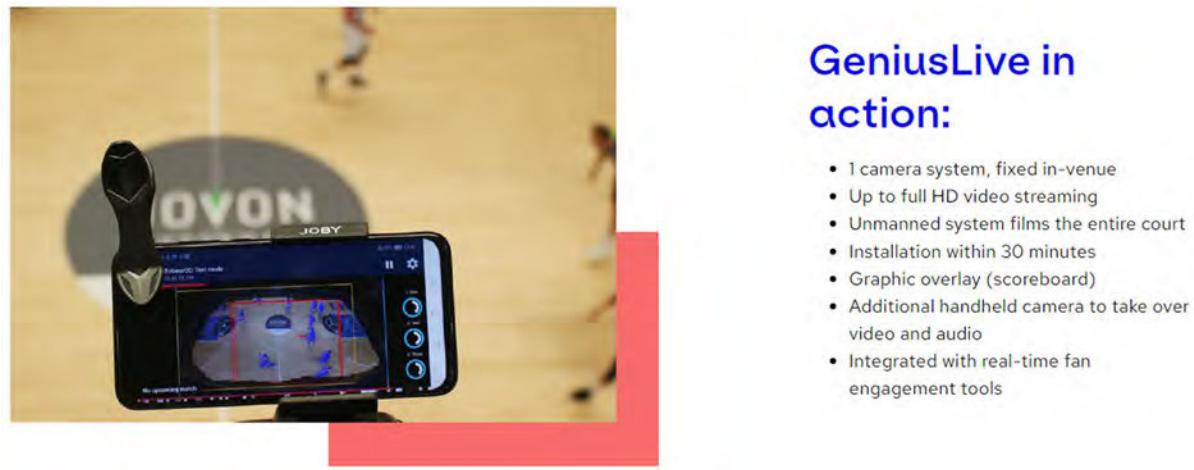
"Combining same game parlays with the unstoppable growth of in-play betting is a breakthrough innovation for us and our partners," said **Jack Davison, Chief Commercial Officer of Genius Sports**. "Starting with the biggest sports event of the year, the FIFA World Cup, *InPlay MultiBet* will enable our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

[redacted]

(*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/.)

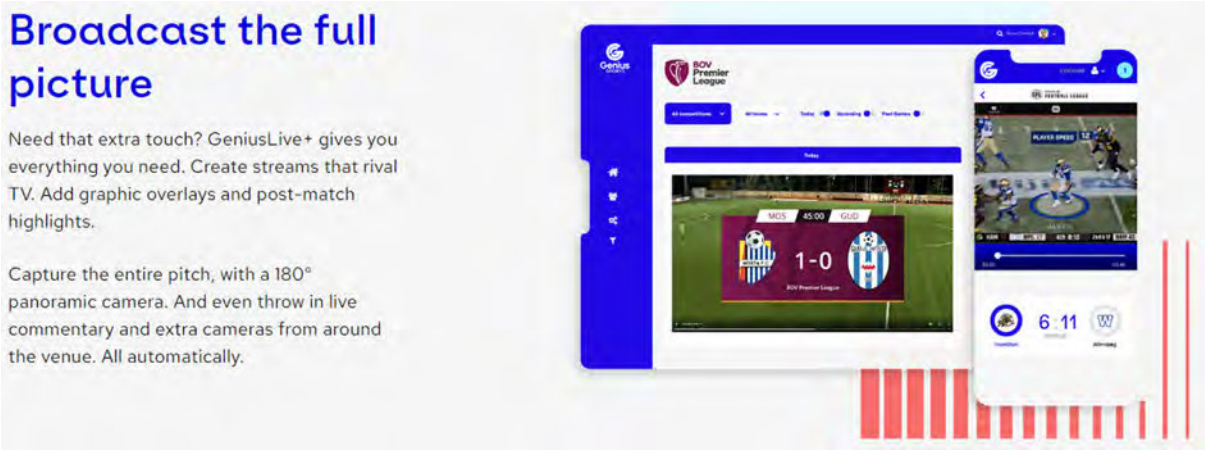


(*See* PANDA_000084 at PANDA_000088, https://geniussports.com/video/capture/.)

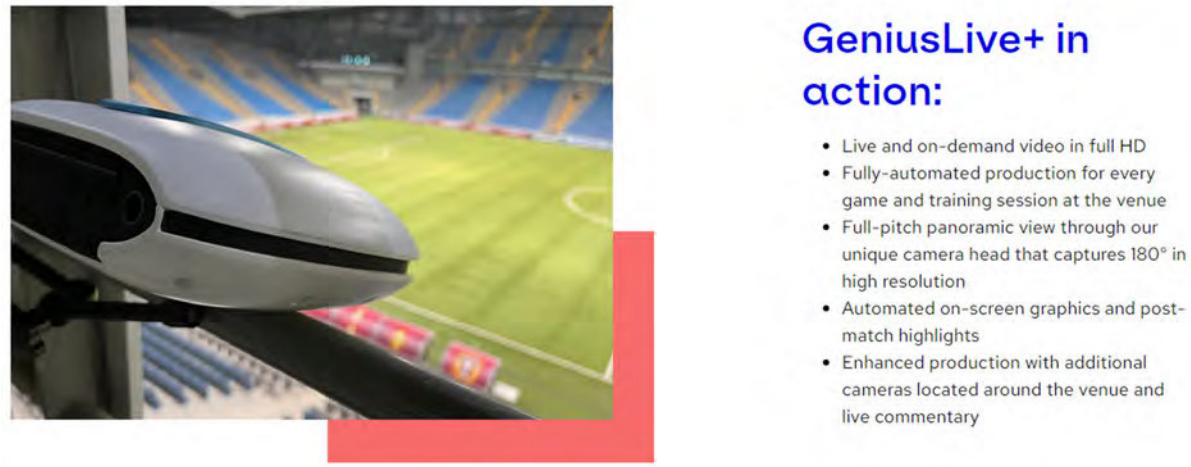


(*See* PANDA_000084 at PANDA_000089, https://geniussports.com/video/capture/.)

[redacted]



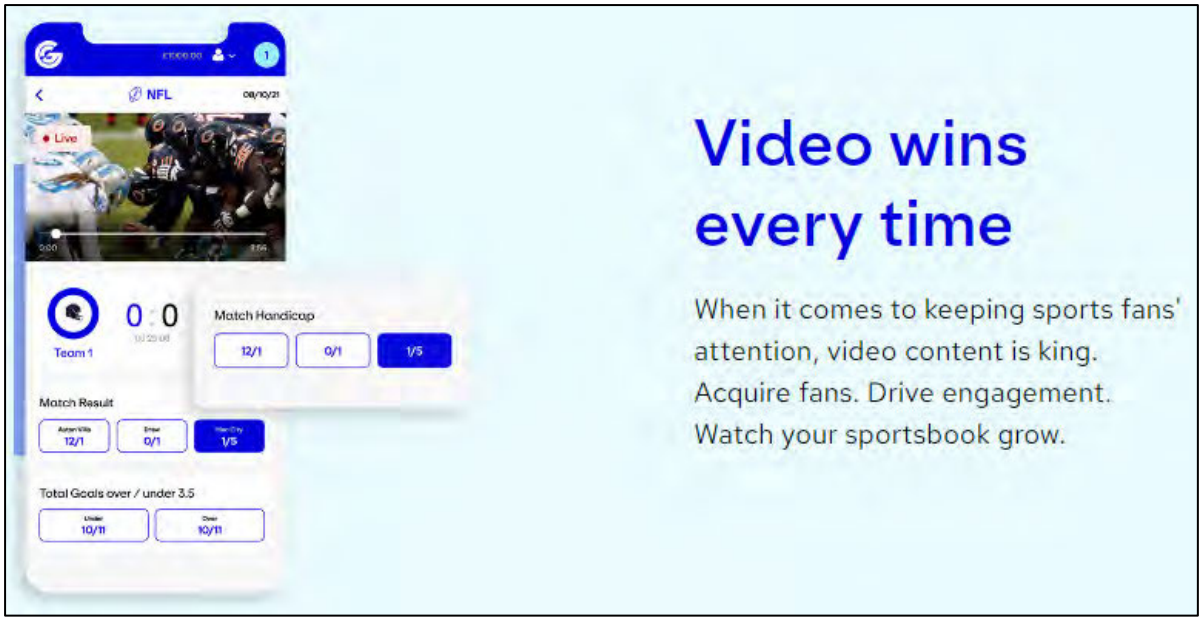
(*See* PANDA_000084 at PANDA_000090, https://geniussports.com/video/capture/.)



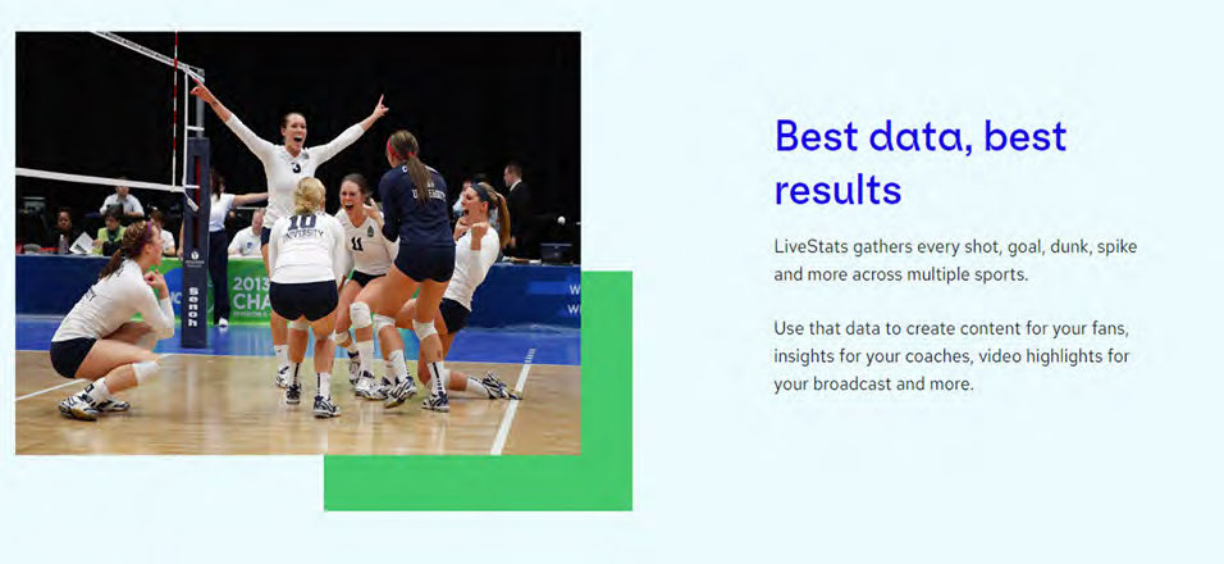
(*See* PANDA_000084 at PANDA_000091, https://geniussports.com/video/capture/.)

274. 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.

[redacted]



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



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

275. 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*

[redacted]

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.

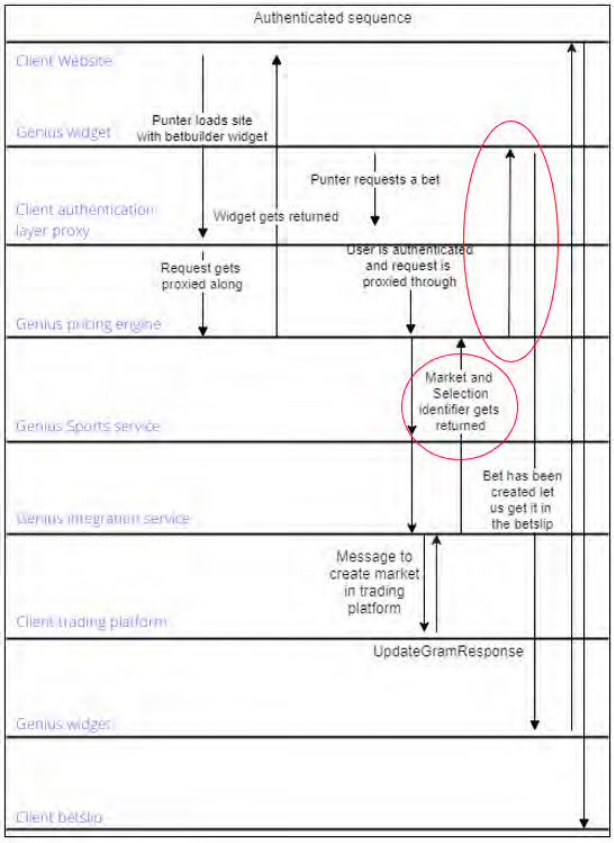
(*See* PANDA_000065, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.)

> 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.)

[redacted]

276. 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.)

277. 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.

[redacted]

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.

f

(*See* PANDA_000077,

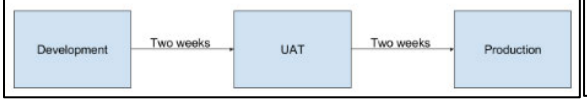
https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.)

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.

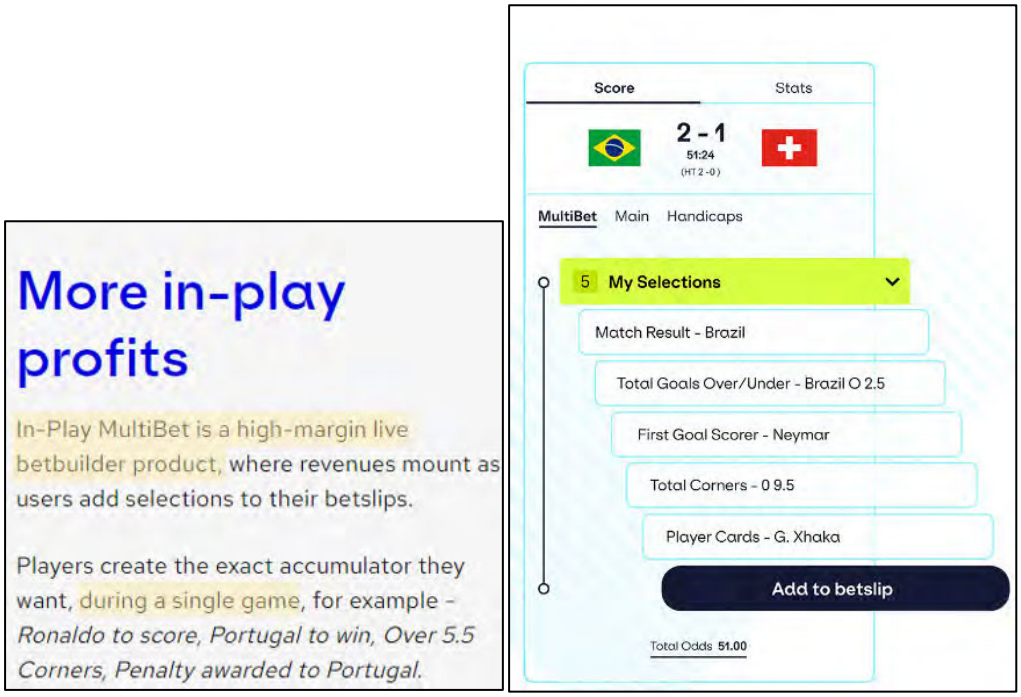
```
<iframe scrolling="no" id="betgenius-iframe" src="https://bs
```

(*See* PANDA_000077-PANDA_000078,

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

[redacted]

278. 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/.)

[redacted]

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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/.)

279. 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

[redacted]

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

280. 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.)

281. 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.

282. <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

[redacted]

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

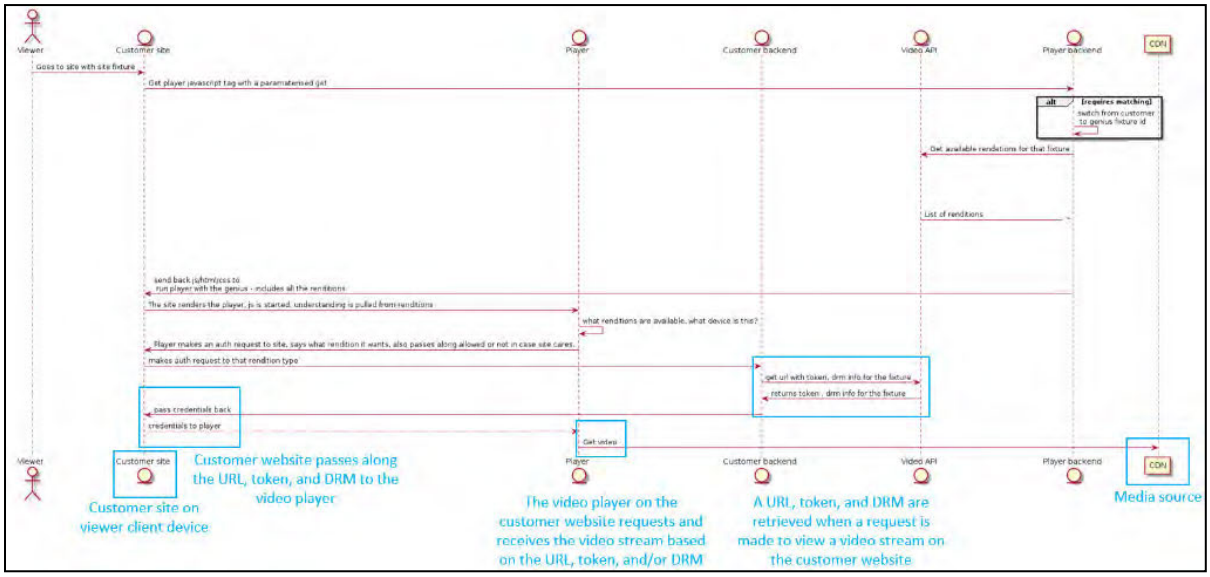
How does it work?

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.

[redacted]



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

283. 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.

[redacted]

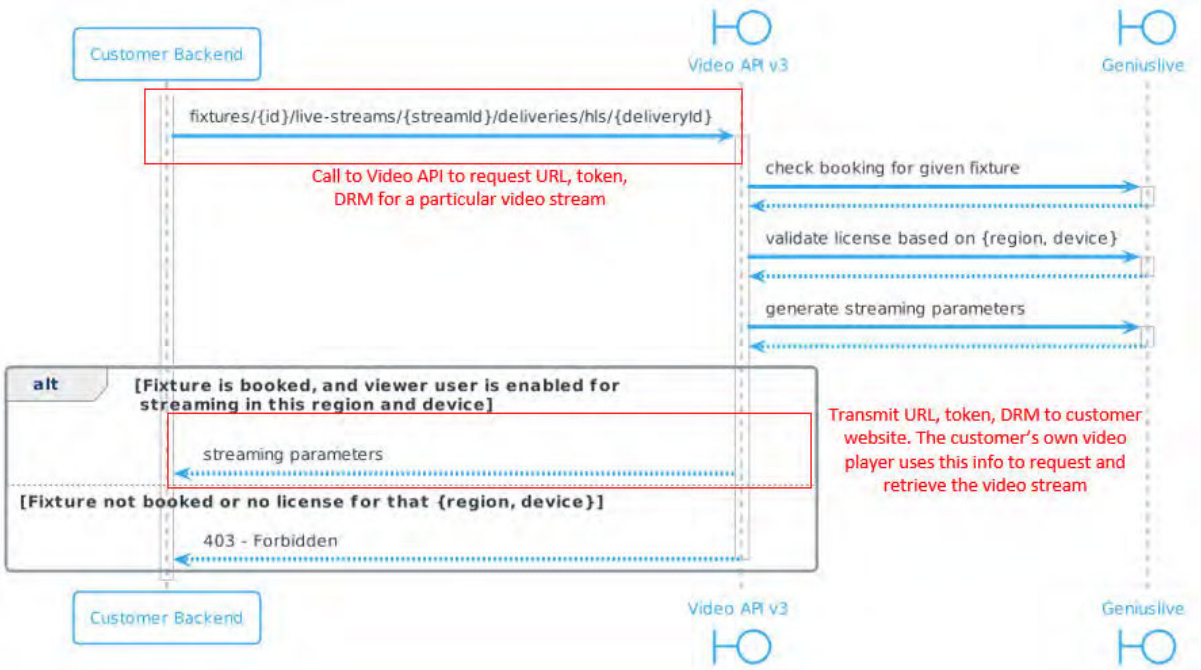
Player integration

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.)

284. 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*

[redacted]

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.

285. 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.

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

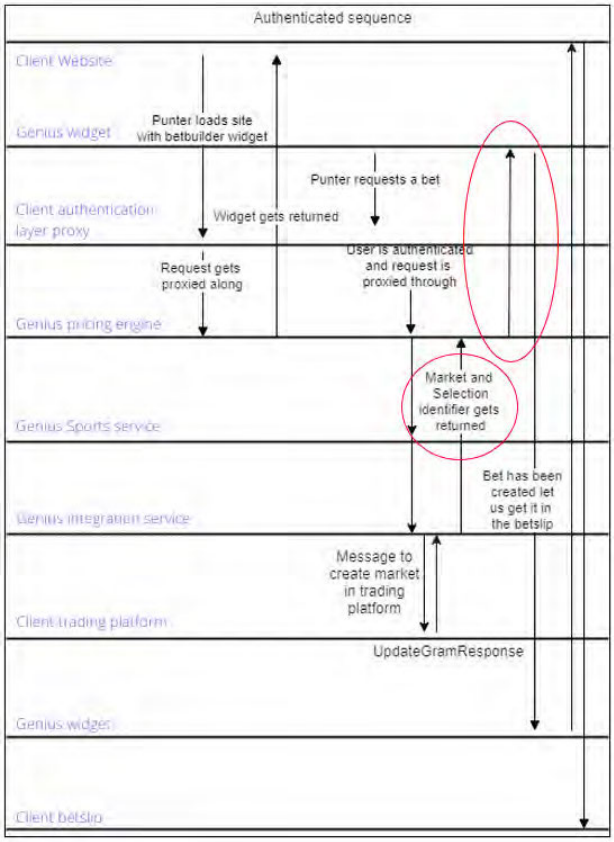
> Please note that latest platform response for each unique Multibet market will be stored on Genius Sports' system in order to be re-used for subsequent bets.

(*See* PANDA_000533 at PANDA_000535, https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664043/Multibet+Sportsbook+Int

[redacted]

egration+V3#Sportsbook-Trading-Platform-Response-to-Multibet-Market-Messages.)

286. 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.)

287. 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.

[redacted]

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.

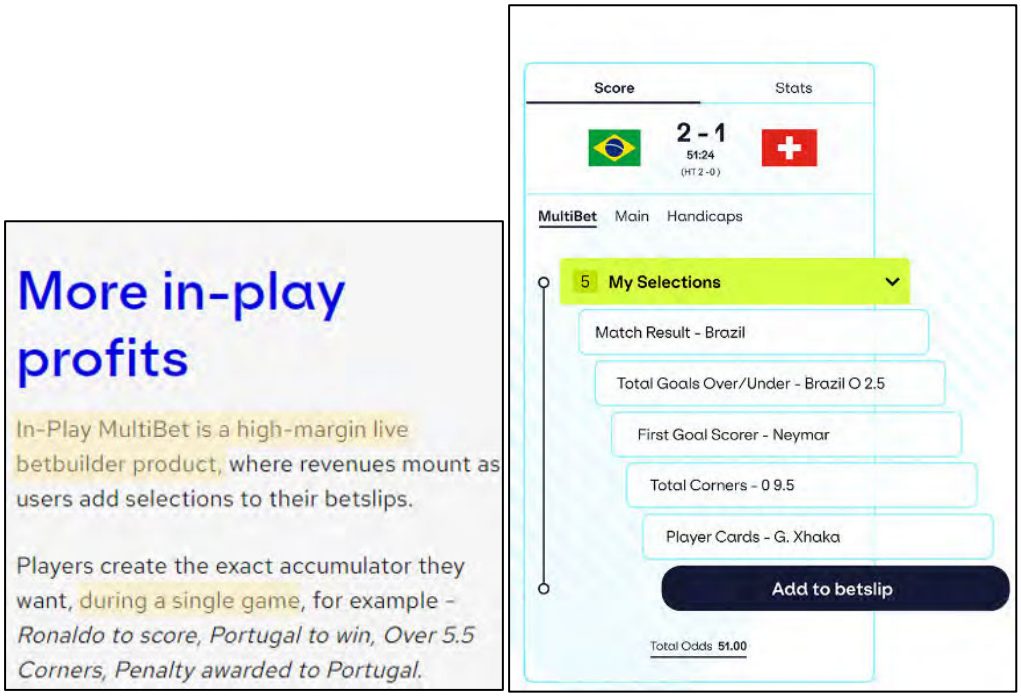
```
<iframe scrolling="no" id="betgenius-iframe" src="https://bs
```

(*See* PANDA_000077-PANDA_000078,

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

[redacted]

288. 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/.)

[redacted]

- 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.

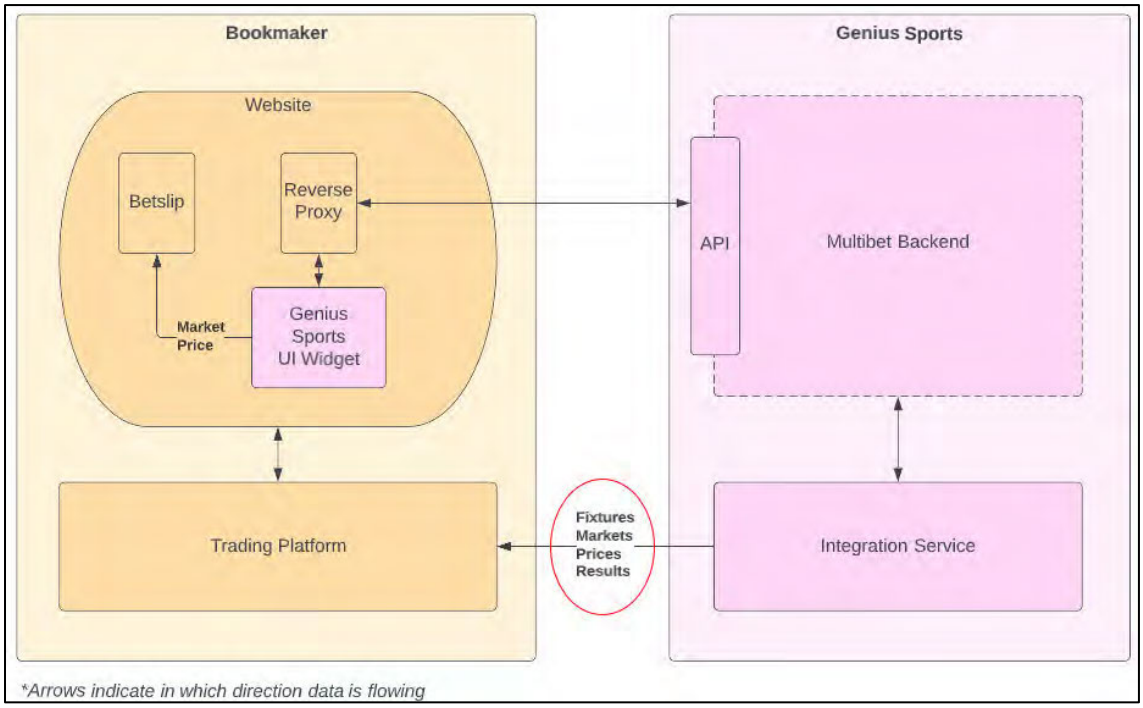
InPlay MultiBet will also be available across the NFL, English Premier League, Liga MX, and dozens of FIBA basketball and FIVB volleyball leagues worldwide.

"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/.)

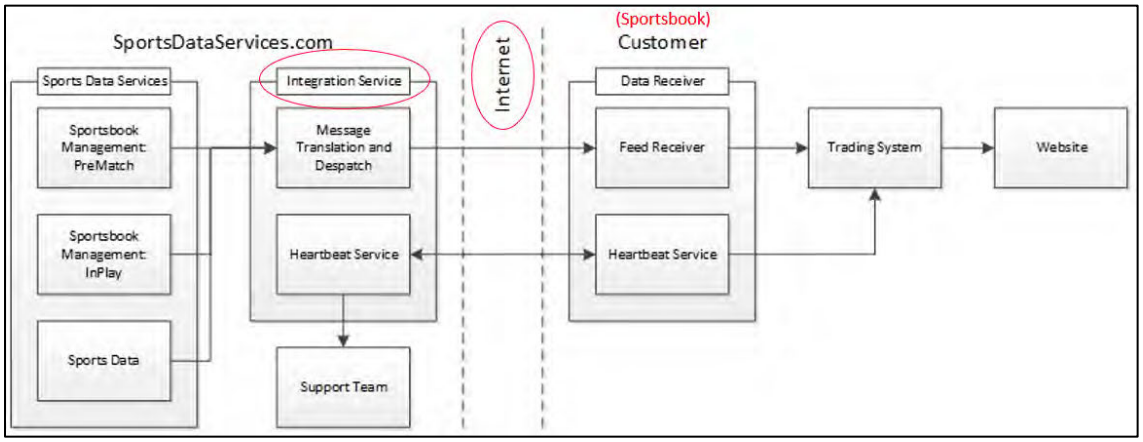
289. During operation, Genius Sport's Integration Service (provided by Sportsbook Integration (V3)) transmits various data (fixtures, markets, prices, results) to the sportsbook's trading platform via an Internet connection. Additionally, the Integration Service transmits a message to create a market (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.

[redacted]



(*See* PANDA_00212 at PANDA_00213,

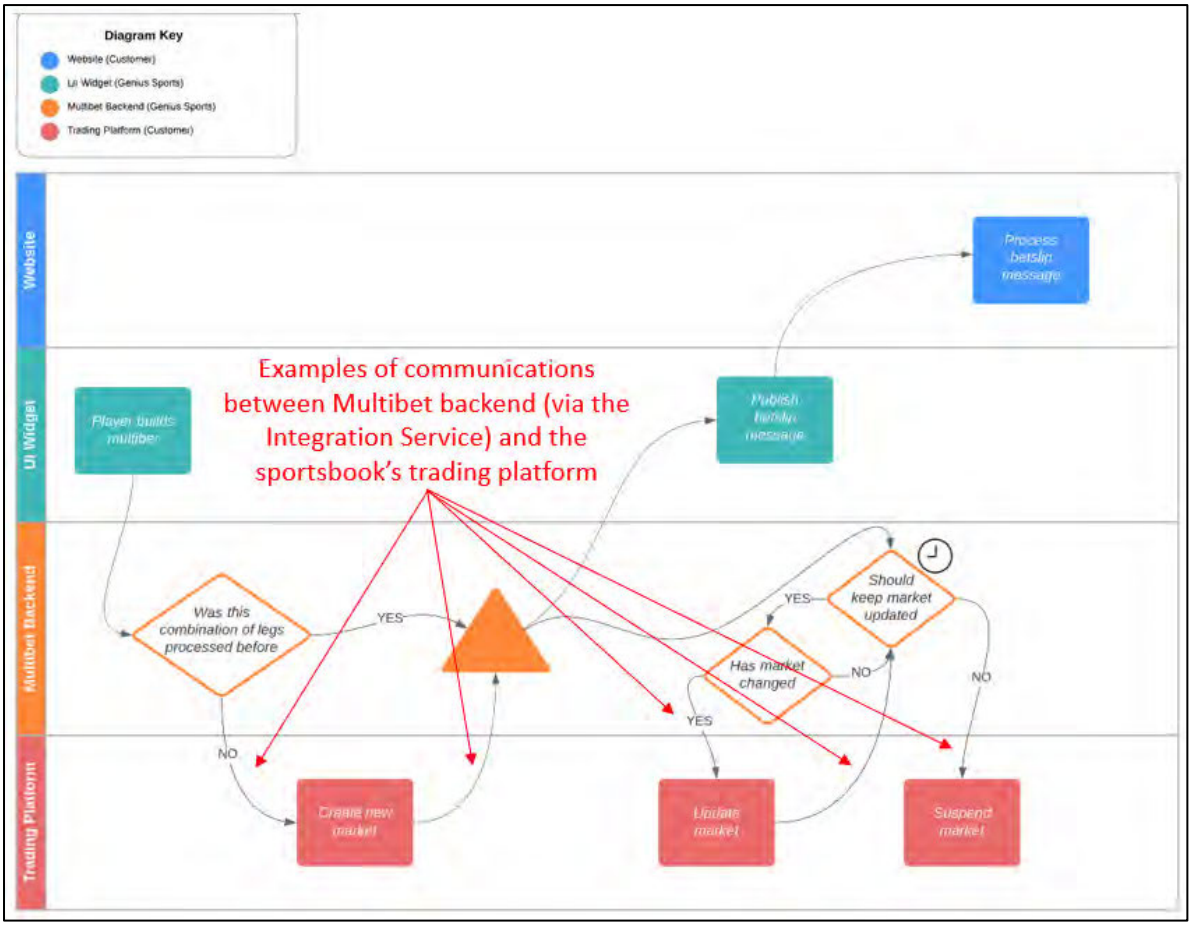
https://geniussports.atlassian.net/wiki/spaces/BID/pages/4283664027/Multibet+Back-End+Integration.)



(*See* PANDA_000539,

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

[redacted]



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

290. 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.

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

[redacted]

292. Defendants 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.

293. Defendants’ partners, customers, and end users of their 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.

294. Defendants have 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 their acts induce infringement, in violation of 35 U.S.C. § 271(b). For example, Defendants encourage and induce 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.

295. Defendants encourage, instruct, direct, and/or require third parties—including their certified partners and/or customers—to use the Accused Products in infringing ways.

296. Defendants further encourage and induce their 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 their video streaming software, and services in the United States.

297. 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

[redacted]

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

298. Defendants also contribute to the infringement of their 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.

299. 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.

300. 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.

301. In addition, as shown in the detailed analysis above, the products, systems, modules, and methods provided by Defendants 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.

302. 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, Defendants direct and control the activities or actions of their 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. Defendants further direct and control 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.

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

[redacted]

304. Plaintiff will continue to suffer irreparable harm unless this Court preliminarily and permanently enjoins Defendants, their agents, employees, representatives, and all others acting in concert with Defendants from infringing the ’697 Patent.

305. Defendants’ infringement of the ’697 Patent is knowing and willful. Defendants 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 Defendants by sending a letter on October 4, 2023, informing Defendants of their infringement of the ’697 Patent.

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

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

FOURTH CAUSE OF ACTION (INFRINGEMENT OF THE ’088 PATENT)

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

309. Defendants has infringed and continue to infringe one or more claims of the ’088 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 claim 1 of the ’088 Patent as demonstrated below.

310. For example, claim 1 of the ’088 Patent recites:

1. A system, comprising:

[redacted]

at least one media source to receive an audio/video feed of a live event and provide a first copy of the audio/video feed of the live event from a first media server endpoint of the at least one media source; and

a webserver configured to:

transmit first instructions to a first client device that includes at least one first display, the first instructions transmitted by the webserver enabling the at least one first display of the first client device to render a first video relating to the live event and render first event information relating to the live event, wherein the first instructions transmitted by the webserver cause the first client device to:

connect to the first media server endpoint of the at least one media source to receive, on a first communication channel between the first media server endpoint and the first client device, the first copy of the audio/video feed of the live event;

connect to a first socket of a socket server to receive, on a second communication channel between the first socket and the first client device, first digital content corresponding to the first event information;

render, on the at least one first display of the first client device, at least some of the first event information as at least one first user-interactive feature overlaid on or adjacent to the first video relating to the live event; and

obtain access to first additional information relating to the live event and/or redirect to a first web site or first app when a first user selects at least a portion of the rendered at least one first user-interactive feature; and

transmit second instructions to a second client device that includes at least one second display, the second instructions transmitted by the webserver enabling the at least one second display of the second client device to also render the first event information relating to the live event, wherein the second instructions transmitted by the webserver cause the second client device to:

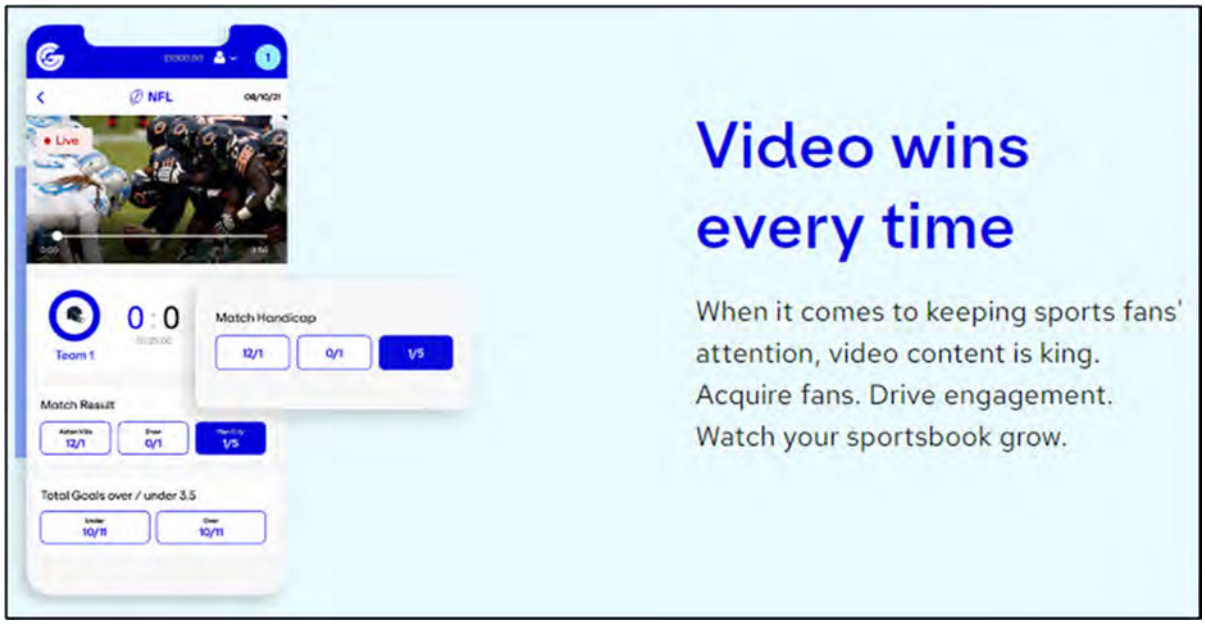
connect to the first socket of the socket server to receive, on a third communication channel between the first socket and the second client device, the first digital content corresponding to the first event information so that the first digital content received at the first client device and the second client device is synchronized and client-by-client latency between the first client device and second client device to render the first event information is thereby mitigated or significantly reduced;

render, on the at least one second display of the second client device, at least some of the first event information as at least one second user-interactive feature; and

[redacted]

> obtain access to the first additional information or second additional information relating to the live event and/or redirect to the first web site, the first app, a second web site or a second app when a second user selects at least a portion of the rendered at least one second user-interactive feature.

311. The Accused Products include each element of claim 1 of the ’088 Patent. To the extent the preamble is construed to be limiting, the Accused Products include *a system*. For example, Genius Sports’ streaming product includes a system to provide both a live stream of a sporting event and overlayed event information germane to the sporting event.



(*See* PANDA_000055 at PANDA_000057)

312. Genius Sports’ streaming products include “*at least one media source to receive an audio/video feed of a live event and provide a first copy of the audio/video feed of the live event from a first media server endpoint of the at least one media source*.” For example, Genius Sports maintains an extensive portfolio of live sporting event video feeds. As described below, Genius Sports delivers “thousands of low latency live streams” from top-tier soccer leagues across

[redacted]

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.

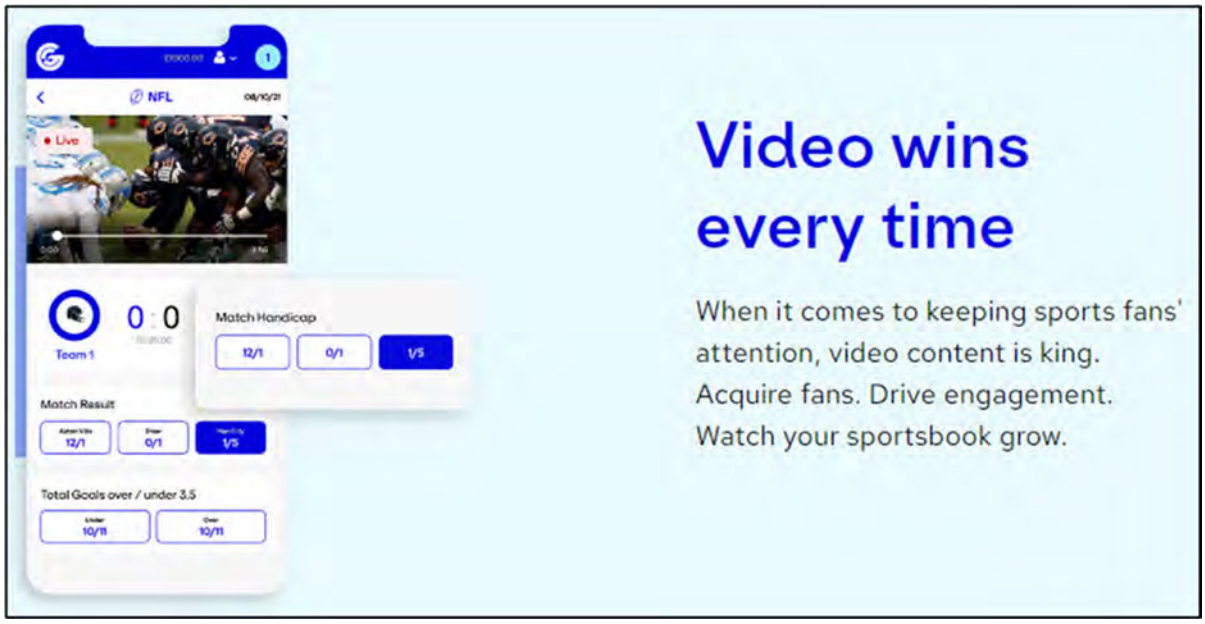
Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipsport will have access to Genius Sports' full NFL product suite, including access to the league's 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/.)

313. Genius Sports' streaming products also include *a webserver configured to transmit first instructions to a first client device that includes at least one first display, the first instructions transmitted by the webserver enabling the at least one first display of the first client device to render a first video relating to the live event and render first event information relating to the live event*. For example, Genius Sports' streaming product includes a system to provide both a live stream of a sporting event and overlayed event information germane to the sporting event.

[redacted]



(*See* PANDA_000055 at PANDA_000057)

314. In addition, Genius Sports' BetVision provides fans with "integrated odds, promotions, real-time statistics, break-in-action offers, graphic overlays and more."

[redacted]

- Genius Sports is the exclusive distributor of NFL Official League Data and live game video streams to sportsbooks
- Caesars Sportsbook, Fanatics and BetRivers first sportsbooks to launch for the 2023 NFL season in the U.S.
- Ground-breaking platform will enable sportsbook customers to place bets within the live video player for the first time
- BetVision to redefine the way fans engage with their favorite sporting events, like the NFL, with integrated odds, promotions, real-time statistics, break-in-action offers, graphic overlays and more

(*See* https://geniussports.com/newsroom/genius-sports-launches-betvision-a-game-changing-immersive-sports-betting-experience-including-nfl-live-game-video/.)

315. In particular, Genius Sports offers two options for sportsbooks to receive their live video stream offerings, each of which uses a webserver: (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

[redacted]

authentication data.

316. Option (1): Drop & Play. For this option, Genius Sports provides a video player widget that can be integrated by a sportsbook into their 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 client device via a communication channel between the CDN and the client device.

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

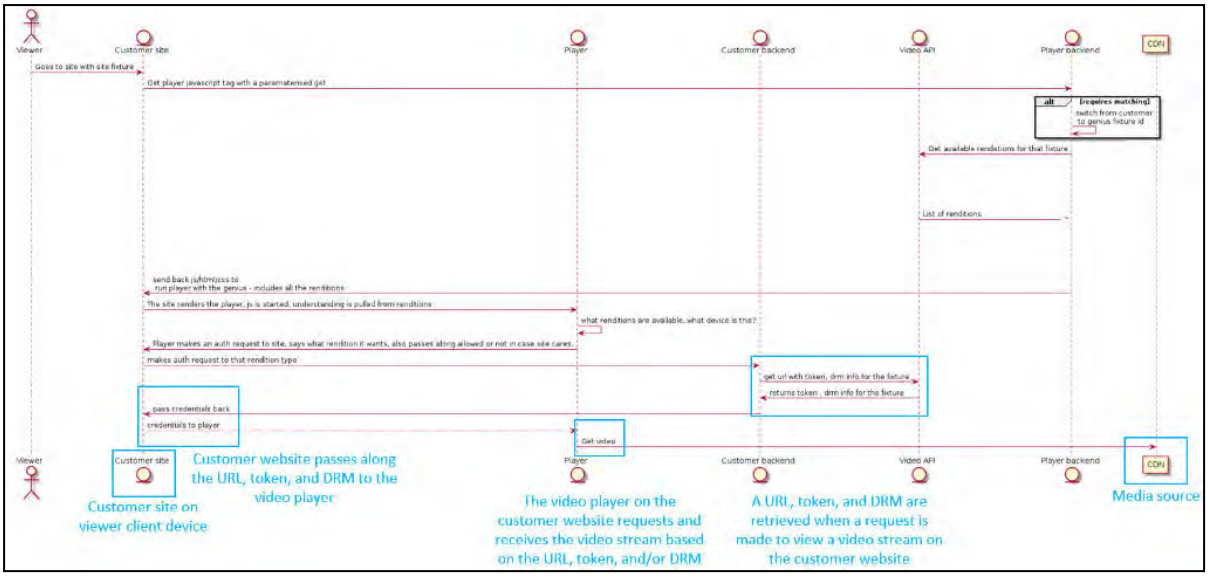
How does it work?

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.

[redacted]



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

317. Option (2): Video API. In 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 their 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 viewer client device.

GL-Video-v3 1.0.33

[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.

[redacted]

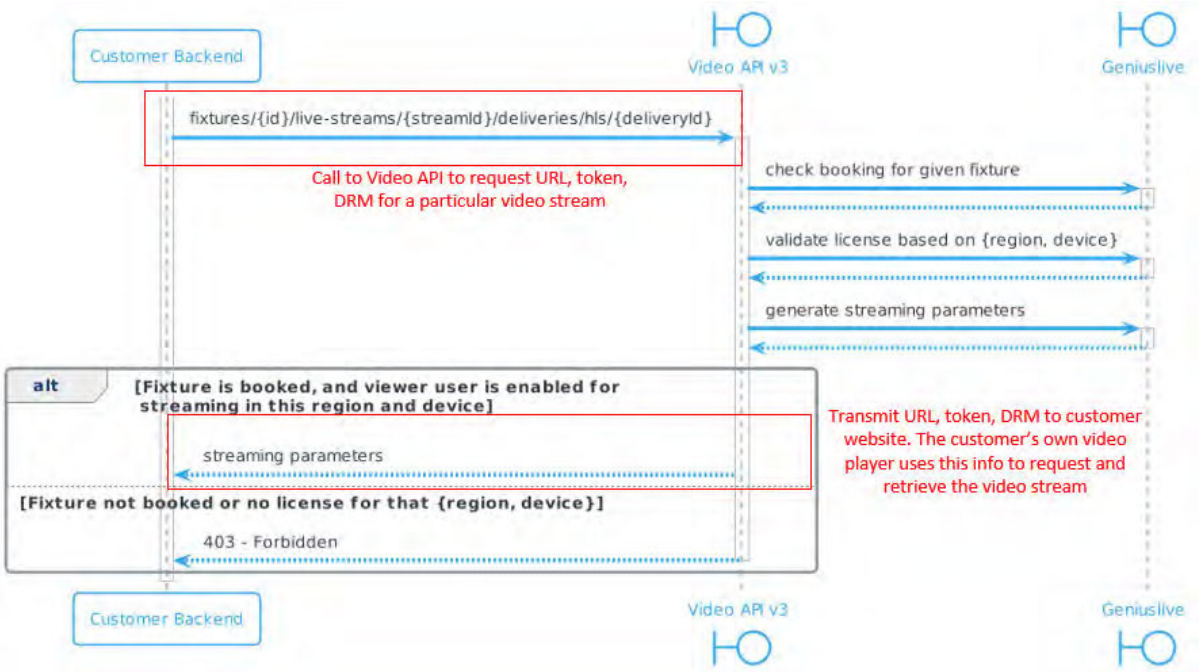
Player integration

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:

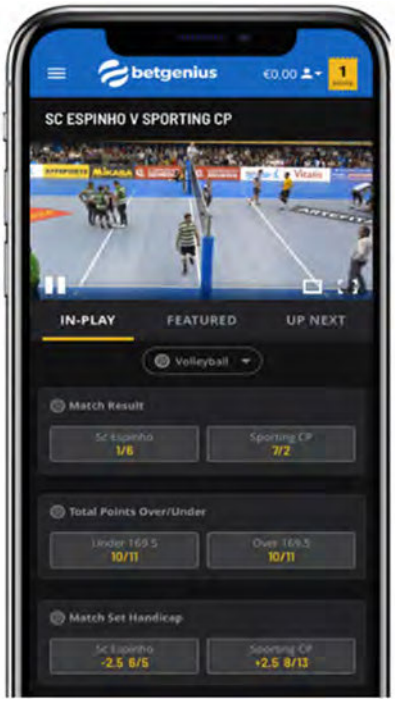
1. Geo-locate the viewer to know the region where the playback is requested
2. Validate if the viewer meets at least one of the permissions required by the selected live stream
3. Select the appropriate delivery to play from the selected live stream. You might need to check the client's platform to choose 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.)

318. Genius Sports' streaming products include *the first instructions transmitted by the webserver cause the first client device to connect to the first media server endpoint of the at least one media source to receive, on a first communication channel between the first media server endpoint and the first client device, the first copy of the audio/video feed of the live event.* As explained above, Genius Sports' streaming product combines live sports data and live sports video.

[redacted]



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

319. In addition, 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.)

[redacted]

320. Also as explained above, Genius Sports offers two options for sportsbooks to receive their 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. More details can be found at PANDA_000541, available online at: https://dap-docs.betstream.betgenius.com/how-to-integrate and PANDA_00217, available online at: https://swaggerui.api.geniussports.com/?url=; https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json.

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<script
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</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

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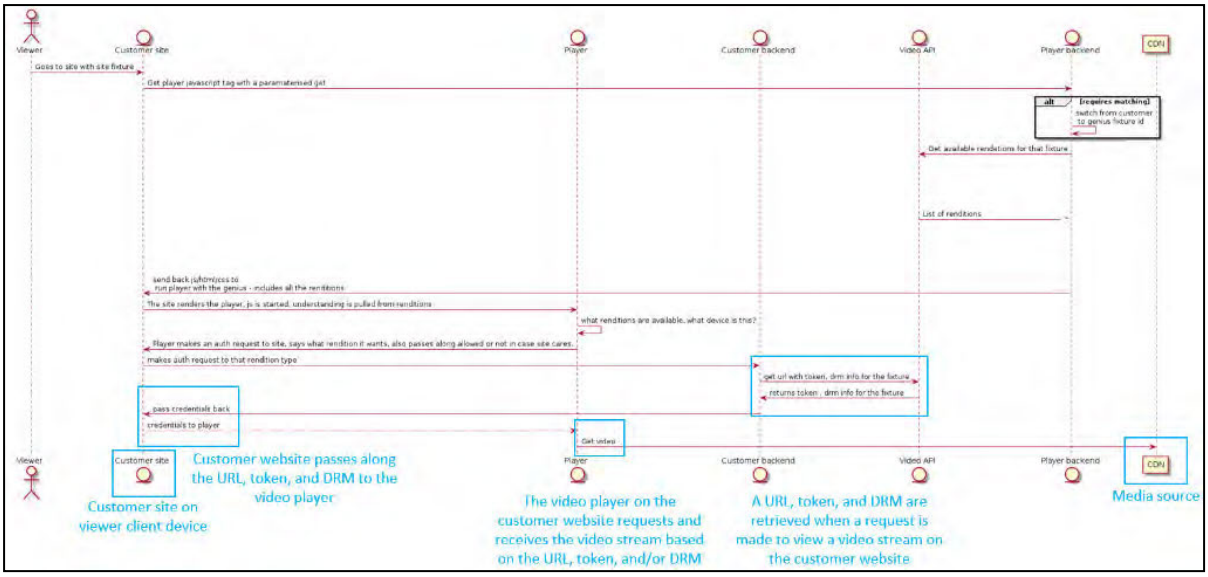
You embed a script tag in your site with the querystring parameters you are interested in passing to the player. Our player looks at the stream types available for the specific fixture you are trying to display and picks the most appropriate stream for your viewers device. Our script will then raise 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.

[redacted]



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

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

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Player integration

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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:

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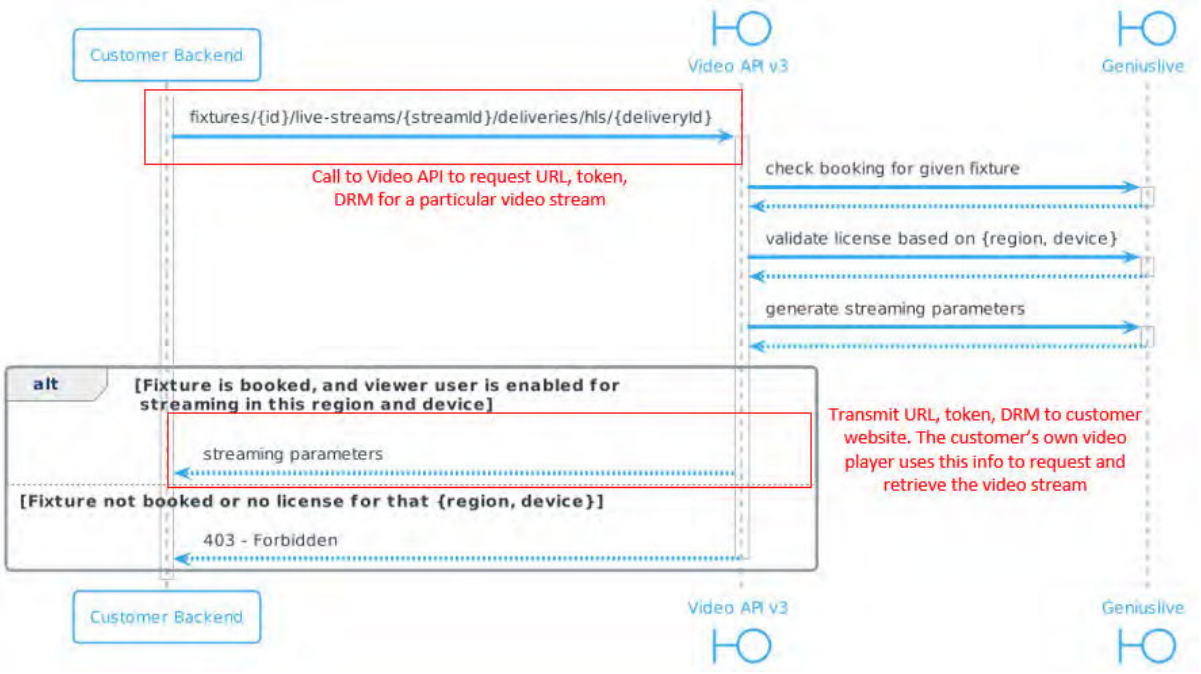
4. Call your backend to get the streaming parameters from the Video API.
5. Play the content using CDN token authentication (and DRM for specific competitions)

[redacted]



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

321. Genius Sport's streaming products include *the first instructions transmitted by the webserver cause the first client device to connect to a first socket of a socket server to receive, on a second communication channel between the first socket and the first client device, first digital content corresponding to the first event information*. For example, 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.

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[redacted]

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

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.)

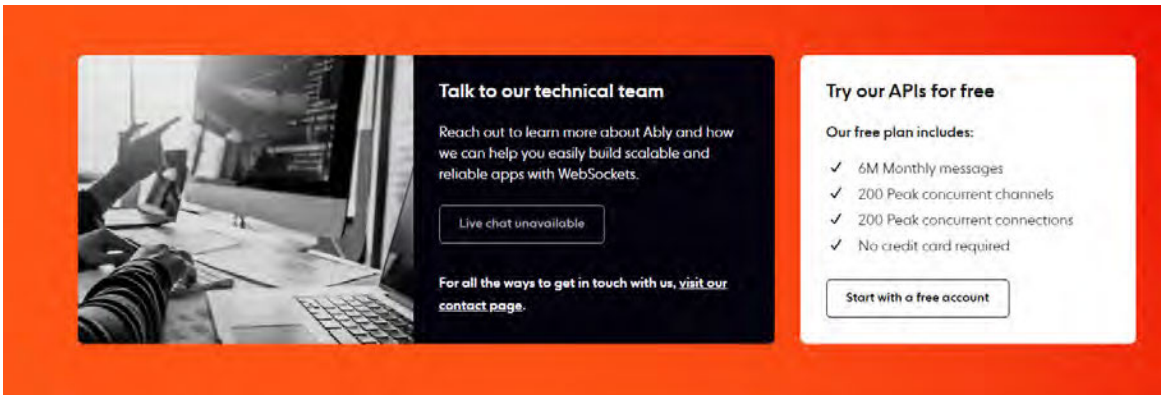
322. Furthermore, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

[redacted]

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.)

323. Genius Sports' employs the Ably platform as part of its "Live Sports Data Integration," whereby "Genius Sports distributes live data for sports events" by using "Pull and Push APIs." (*See* https://geniussports.atlassian.net/wiki/spaces/BID/pages/3990454273/Genius+Sports+Live+Sports+Data+Integration.)

[redacted]

Genius Sports Live Sports Data Integration

MK Owned by Martin Kuks ···
Jul 05, 2022 • 2 min read

- Introduction
- Overview of Push and Pull APIs
- Architecture diagram
- Integration Environments

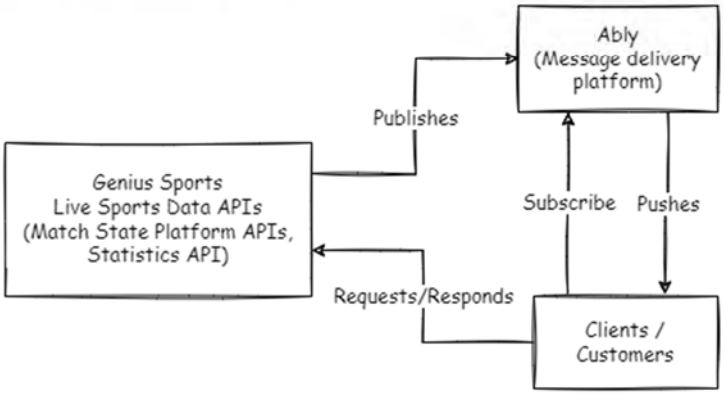
Introduction

Genius Sports distributes live data for sports events. For that purpose Genius Sports systems provide Pull and Push APIs.

Pull API for live sports data is exposed via collection of REST APIs called Match State Platform APIs and Statistics APIs. Their purpose is to provide endpoints for requesting information about current state of sports events by request/response model.

Push API is exposed via message delivery platform called Ably. Its purpose is to provide channels for retrieving information about current state of sports events by publish/subscribe message model.

Architecture diagram



324. Genius Pushes these notifications (e.g., a goal being scored in a game) through "push feeds" that are sent to all end users who "subscribe" to a given "channel" via "Ably." Moreover, in Ably, "**every message** published to a unique channel is broadcast by Ably to **all subscribers." (***See* https://geniussports.atlassian.net/wiki/spaces/BID/pages/3990454301/Genius+Sports+Live+Sports+Data+Push+API+via+Ably (emphasis added).)

[redacted]

Introduction

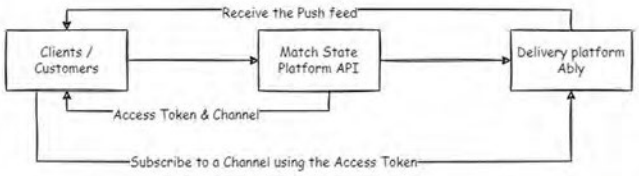
This document explains how to connect to Ably and receive "push feeds" where messages are sent by Genius Sports to clients as sporting actions occur. E.g. a message may describe a goal being scored or a sporting fixture starting.

A catalog of available feeds may be found in API Explorer for Genius Ably Push Feeds which describes the available data in detail.

Terminology

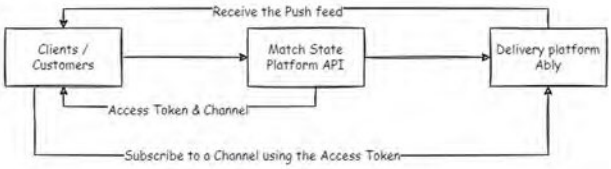
- **Ably Channel** - Channels are the medium through which messages are distributed. Clients attach to channels to subscribe to messages, and every message published to a unique channel is broadcast by Ably to all subscribers. This messaging pattern is commonly called the Publish–subscribe pattern . You can read more about Ably Channels here.
- **Access Token** - Ably's authentication token required to establish a connection with Ably. You can learn more about this here.
- **Client Library** - Ably's public open-source SDKs provided to clients to simplify the software development work required by users of Ably. More information is available here.

Technology Overview



The API is implemented using the Ably platform. Ably acts as a high-performance communication hub between Genius Sports and clients of the API around the World.

Technology Overview



The API is implemented using the Ably platform. Ably acts as a high-performance communication hub between Genius Sports and clients of the API around the World.

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325. Genius Sports' streaming products include *the first instructions transmitted by the webserver cause the first client device to render, on the at least one first display of the first client device, at least some of the first event information as at least one first user-interactive feature overlaid on or adjacent to the first video relating to the live event*. For example, Genius Sports' BetVision "brings live streams together with integrated bet slips, statistical insights, and real-time

[redacted]

augmentations within a single interactive player."

> Genius Sports Limited ("Genius Sports") (NYSE:GENI) has unveiled BetVision, the world's first immersive sports wagering experience that brings live streams together with integrated bet slips, statistical insights, and real-time augmentations within a single interactive player. Genius Sports is launching BetVision with NFL live games in the U.S.
>
> For the first time ever, BetVision will allow sportsbook customers to place wagers from within the live video player in the sportsbook app. These low latency live game video streams feature integrated betting odds and betslips and will be enhanced by in-game betting alerts and on-screen offers during breaks in game action to increase relevance, drive engagement and retain customers.
>
> NFL content is available on mobile and tablet devices and will include live augmentations such as data-driven insights, graphic overlays and visualizations already in use with a range of broadcast and streaming partners across North America. BetVision is a uniquely personalized product that allows users to toggle on and off content and stats to create a tailored viewing experience based on their individual preferences.

(*See, e.g.*, https://geniussports.com/newsroom/genius-sports-launches-betvision-a-game-changing-immersive-sports-betting-experience-including-nfl-live-game-video/.)

326. In addition, "BetVision also provides viewers with real-time data and insights they can interact with on screen during the game broadcast."

[redacted]

BetVision enables fans to place a wager from a bet slip that sits above the live stream.

The digital nature of the solution means Genius (and its sportsbook partners) have valuable information about those watching games in-app; data that can be used to eventually create personalized wagering options.

"Over time, we can look at previous bet activity and start surfacing the most relevant bet types based on what is happening in the game and the bettor's preferences," Conroy said. "That should drive further interactivity and engagement as the relevance of the content the user is seeing is heightened."

BetVision also provides viewers with real-time data and insights they can interact with on screen during the game broadcast.

"Things like graphics with players' names and stats above the players' heads. If you have a player prop, you can actually see the offensive lineup and track the player's progress," Conroy said. "It's all engineered towards creating an additive experience for bettors."

Genius will be adding bet tracking (think: statistical overlays reflecting win probabilities), and could, in time, add the ability for bettors to 'cash out' on-screen during the game too.

(*See* https://blog.johnwallstreet.com/p/genius-betvision-could-be-used-to-create-immersive-experiences-for-core-tv-audience.)

327. Genius Sports' streaming products include *the first instructions transmitted by the webserver cause the first client device to obtain access to first additional information relating to the live event and/or redirect to a first web site or first app when a first user selects at least a portion of the rendered at least one first user-interactive feature*. For example, "BetVision is a uniquely personalized product that allows users to toggle on and off content and stats to create a tailored viewing experience based on their individual preferences."

[redacted]

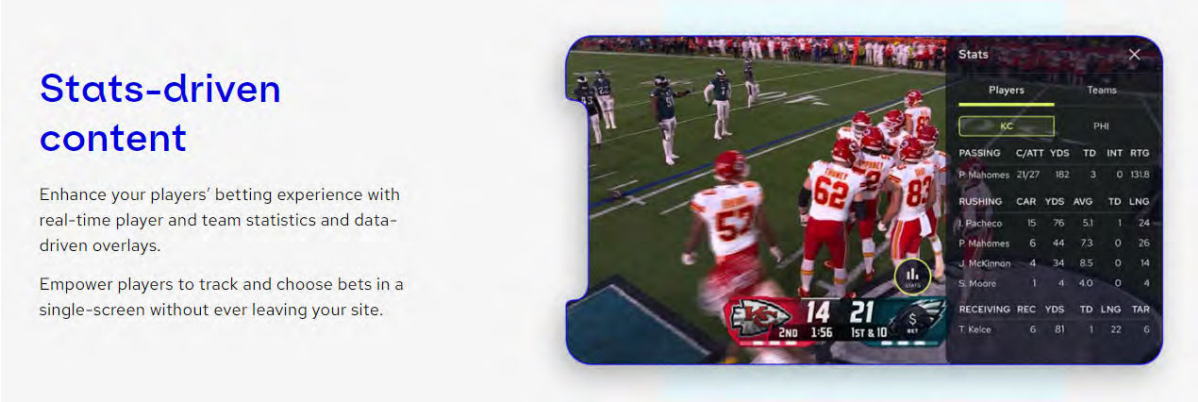
Genius Sports Limited ("Genius Sports") (NYSE:GENI) has unveiled BetVision, the world's first immersive sports wagering experience that brings live streams together with integrated bet slips, statistical insights, and real-time augmentations within a single interactive player. Genius Sports is launching BetVision with NFL live games in the U.S.

For the first time ever, BetVision will allow sportsbook customers to place wagers from within the live video player in the sportsbook app. These low latency live game video streams feature integrated betting odds and betslips and will be enhanced by in-game betting alerts and on-screen offers during breaks in game action to increase relevance, drive engagement and retain customers.

NFL content is available on mobile and tablet devices and will include live augmentations such as data-driven insights, graphic overlays and visualizations already in use with a range of broadcast and streaming partners across North America. BetVision is a uniquely personalized product that allows users to toggle on and off content and stats to create a tailored viewing experience based on their individual preferences.

(*See, e.g.*, https://geniussports.com/newsroom/genius-sports-launches-betvision-a-game-changing-immersive-sports-betting-experience-including-nfl-live-game-video/.)

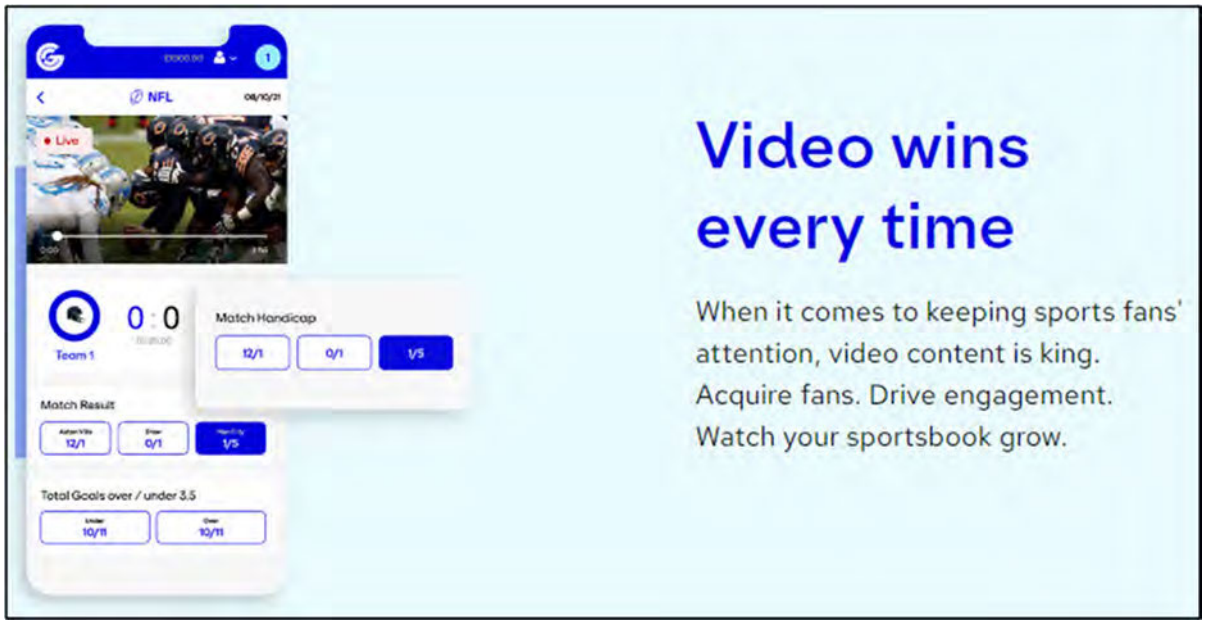
328. In addition, Genius Sports' BetVision can "[e]nhance [] players' betting experience with real-time player and team statistics and data-driven overlays" and "[e]mpower players to track and choose bets in a single-screen without ever leaving your site."



(*See* https://geniussports.com/sportsbook/betvision/#bet-vision-video.)

[redacted]

329. Genius Sports' streaming products include *a webserver configured to transmit second instructions to a second client device that includes at least one second display, the second instructions transmitted by the webserver enabling the at least one second display of the second client device to also render the first event information relating to the live event*. For example, Genius Sports' streaming product includes a system to provide both a live stream of a sporting event and overlayed event information germane to the sporting event.



(*See* PANDA_000055 at PANDA_000057.)

330. In addition, Sport Genius' BetVision provides fans with "integrated odds, promotions, real-time statistics, break-in-action offers, graphic overlays and more."

[redacted]

- Genius Sports is the exclusive distributor of NFL Official League Data and live game video streams to sportsbooks
- Caesars Sportsbook, Fanatics and BetRivers first sportsbooks to launch for the 2023 NFL season in the U.S.
- Ground-breaking platform will enable sportsbook customers to place bets within the live video player for the first time
- BetVision to redefine the way fans engage with their favorite sporting events, like the NFL, with integrated odds, promotions, real-time statistics, break-in-action offers, graphic overlays and more

(*See* https://geniussports.com/newsroom/genius-sports-launches-betvision-a-game-changing-immersive-sports-betting-experience-including-nfl-live-game-video/.)

331. As explained above, Genius Sports offers two options for sportsbooks to receive their 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.

[redacted]

332. Option (1): Drop & Play. For this option, Genius Sports provides a video player widget that can be integrated by a sportsbook into their 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 client device via a communication channel between the CDN and the client device.

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

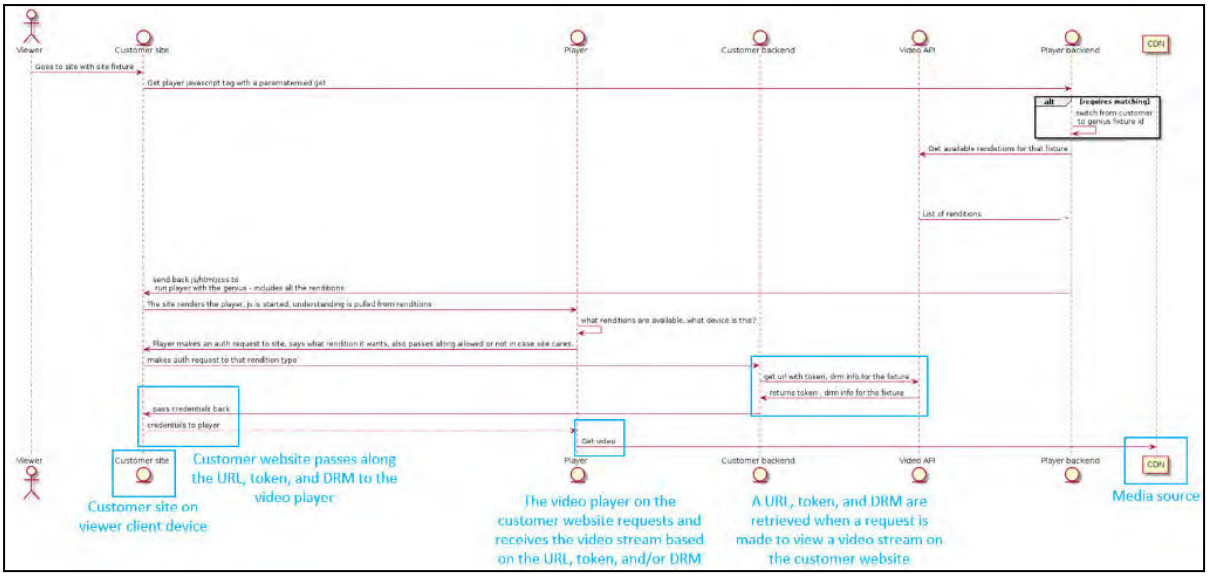
How does it work?

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.

[redacted]



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

333. Option (2): Video API. In 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 their 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 viewer client device.

GL-Video-v3 1.0.11

[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.

[redacted]

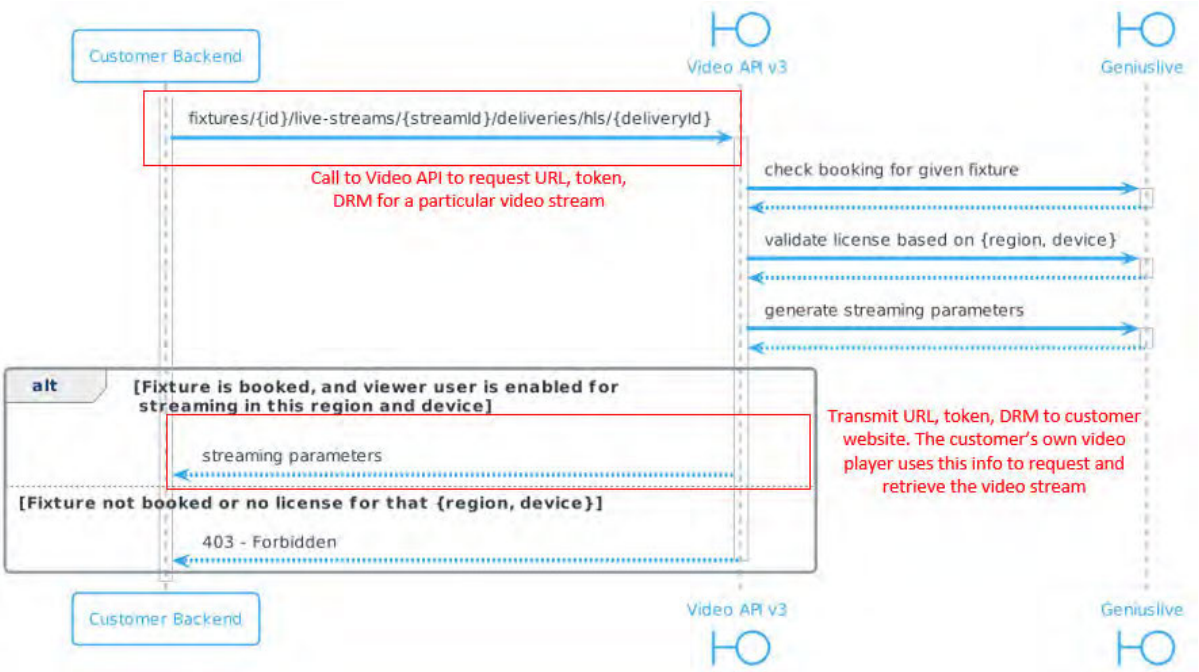
Player integration

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.)

334. Genius Sports' streaming products include *the second instructions transmitted by the webserver to cause the second client device to connect to the first socket of the socket server to receive, on a third communication channel between the first socket and the second client device, the first digital content corresponding to the first event information so that the first digital content received at the first client device and the second client device is synchronized and client-by-client latency between the first client device and second client device to render the first event*

[redacted]

information is thereby mitigated or significantly reduced. For example, Genius Sports maintains an expansive portfolio of live sporting event video feeds. 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.

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

335. In addition, Genius Sports' streaming products provides "[o]fficial low-latency data feeds straight from the venue."

Sportsbooks / Betting Data & Odds / LiveData

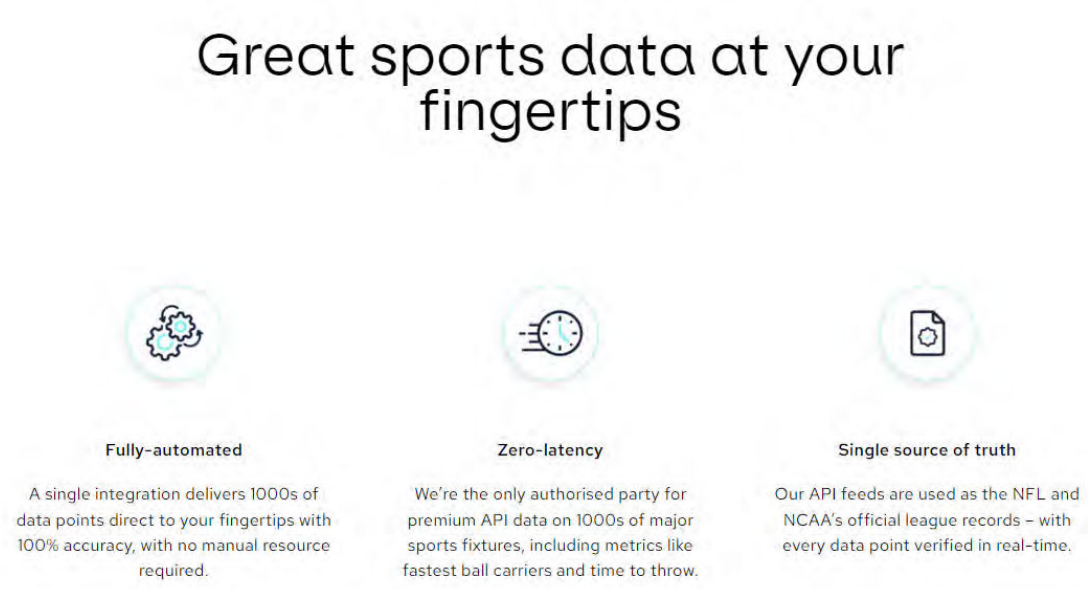
Data to set odds with confidence

Official low-latency data feeds straight from the venue. Set odds and manage live events faster than ever before.

Get a demo

[redacted]

(*See* https://geniussports.com/sportsbook/betting-data-odds/livedata/.)



(*See* https://geniussports.com/genius-marketing-suite/genius-data-content/.)

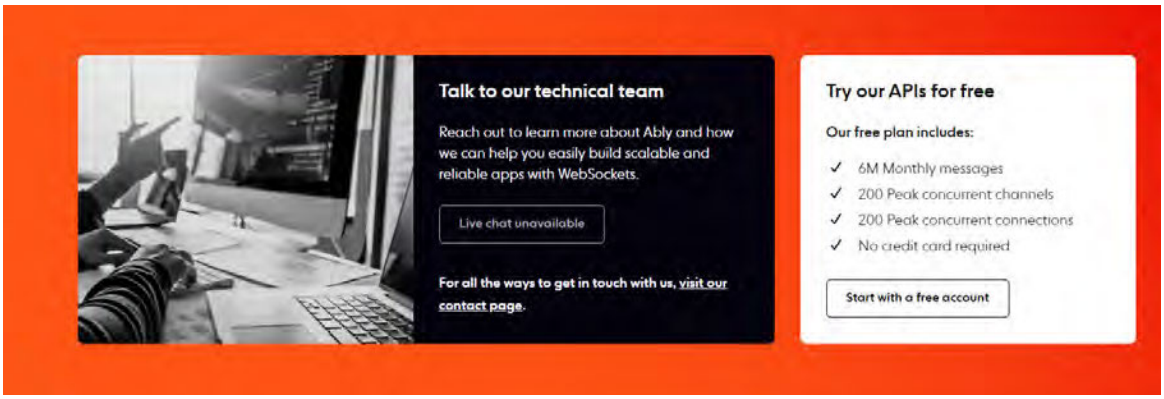
336. Furthermore, Genius Sports "relies on Ably to handle live sports and betting data delivery across 80 apps – each dedicated to a different sport" and Ably "can help [customers] easily build scalable and reliable apps with WebSockets."

[redacted]

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.)

337. Genius Sports' employs the Ably platform as part of its "Live Sports Data Integration," whereby "Genius Sports distributes live data for sports events" by using "Pull and Push APIs." (*See* https://geniussports.atlassian.net/wiki/spaces/BID/pages/3990454273/Genius+Sports+Live+Sports+Data+Integration.)

[redacted]

Genius Sports Live Sports Data Integration

MK Owned by Martin Kuks •••
Jul 05, 2022 • 2 min read

- Introduction
- Overview of Push and Pull APIs
- Architecture diagram
- Integration Environments

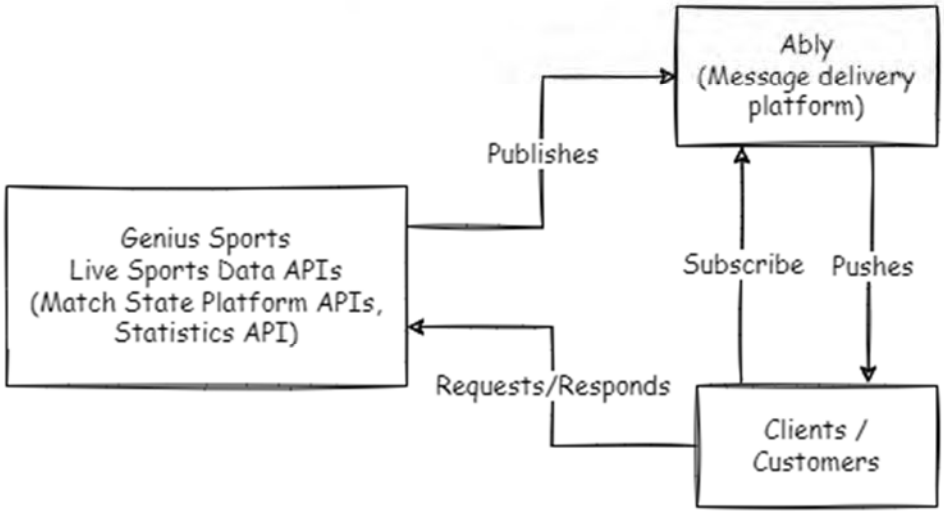
Introduction

Genius Sports distributes live data for sports events. For that purpose Genius Sports systems provide Pull and Push APIs.

Pull API for live sports data is exposed via collection of REST APIs called Match State Platform APIs and Statistics APIs. Their purpose is to provide endpoints for requesting information about current state of sports events by request/response model.

Push API is exposed via message delivery platform called Ably. Its purpose is to provide channels for retrieving information about current state of sports events by publish/subscribe message model.

Architecture diagram



[redacted]

338. Genius Pushes these notifications (e.g., a goal being scored in a game) through "push feeds" that are sent to all end users who "subscribe" to a given "channel" via "Ably." Moreover, in Ably, "**every message** published to a unique channel is broadcast by Ably to **all subscribers." (***See* https://geniussports.atlassian.net/wiki/spaces/BID/pages/3990454301/Genius+Sports+Live+Sports+Data+Push+API+via+Ably (emphasis added).)

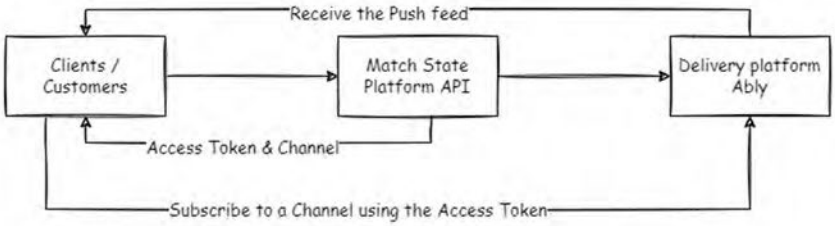
This document explains how to connect to Ably and receive "push feeds" where messages are sent by Genius Sports to clients as sporting actions occur. E.g. a message may describe a goal being scored or a sporting fixture starting.

A catalog of available feeds may be found in API Explorer for Genius Ably Push Feeds which describes the available data in detail.

Terminology

- **Ably Channel** - Channels are the medium through which messages are distributed. Clients attach to channels to subscribe to messages, and every message published to a unique channel is broadcast by Ably to all subscribers. This messaging pattern is commonly called the Publish–subscribe pattern. You can read more about Ably Channels here.
- **Access Token** - Ably's authentication token required to establish a connection with Ably. You can learn more about this here.
- **Client Library** - Ably's public open-source SDKs provided to clients to simplify the software development work required by users of Ably. More information is available here.

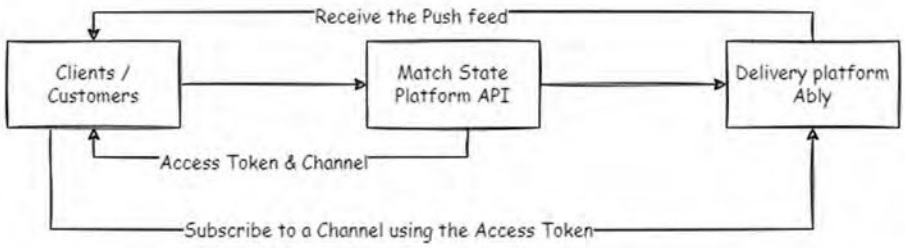
Technology Overview



The API is implemented using the Ably platform. Ably acts as a high-performance communication hub between Genius Sports and clients of the API around the World.

[redacted]

Technology Overview



The API is implemented using the Ably platform. Ably acts as a high-performance communication hub between Genius Sports and clients of the API around the World.

---

339. Genius Sports' streaming products include *the second instructions transmitted by the webserver to cause the second client device to render, on the at least one second display of the second client device, at least some of the first event information as at least one second user-interactive feature*. For example, Genius Sports' BetVision "brings live streams together with integrated bet slips, statistical insights, and real-time augmentations within a single interactive player."

[redacted]

> Genius Sports Limited ("Genius Sports") (NYSE:GENI) has unveiled BetVision, the world's first immersive sports wagering experience that brings live streams together with integrated bet slips, statistical insights, and real-time augmentations within a single interactive player. Genius Sports is launching BetVision with NFL live games in the U.S.
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340. In addition, "BetVision also provides viewers with real-time data and insights they can interact with on screen during the game broadcast."

[redacted]

BetVision enables fans to place a wager from a bet slip that sits above the live stream.

The digital nature of the solution means Genius (and its sportsbook partners) have valuable information about those watching games in-app; data that can be used to eventually create personalized wagering options.

"Over time, we can look at previous bet activity and start surfacing the most relevant bet types based on what is happening in the game and the bettor's preferences," Conroy said. "That should drive further interactivity and engagement as the relevance of the content the user is seeing is heightened."

BetVision also provides viewers with real-time data and insights they can interact with on screen during the game broadcast.

"Things like graphics with players' names and stats above the players' heads. If you have a player prop, you can actually see the offensive lineup and track the player's progress," Conroy said. "It's all engineered towards creating an additive experience for bettors."

Genius will be adding bet tracking (think: statistical overlays reflecting win probabilities), and could, in time, add the ability for bettors to 'cash out' on-screen during the game too.

(*See* https://blog.johnwallstreet.com/p/genius-betvision-could-be-used-to-create-immersive-experiences-for-core-tv-audience.)

341. Genius Sports' streaming products include *the second instructions transmitted by the webserver to cause the second client device to obtain access to the first additional information or second additional information relating to the live event and/or redirect to the first web site, the first app, a second web site or a second app when a second user selects at least a portion of the rendered at least one second user-interactive feature*. For example, "BetVision is a uniquely personalized product that allows users to toggle on and off content and stats to create a tailored viewing experience based on their individual preferences."

[redacted]

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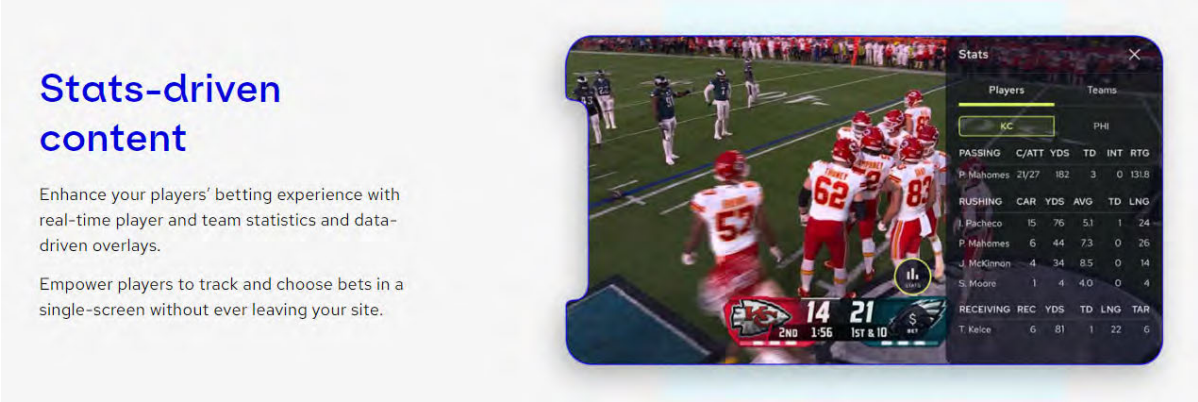

(*See* https://geniussports.com/sportsbook/betvision/#bet-vision-video.)

[redacted]

343. Each claim in the ’088 Patent recites an independent invention. Neither claim 1, described above, nor any other individual claim is representative of all claims in the ’088 Patent.

344. Defendants have been aware of the ’088 Patent since at least the filing of this First Amended Complaint. Further, Plaintiff provided affirmative notice of the ’088 Patent to Defendants by sending a letter on April 17, 2024, informing Defendants of their infringement of the ’088 Patent, which is also owned by Plaintiff. Additionally, Plaintiff has met with and had communications with executives at Genius Sports since 2018.

345. Defendants directly infringe at least claim 1 of the ’088 Patent, either literally or under the doctrine of equivalents, by making, using, offering to sell, and selling the systems described above.

346. Defendants’ partners, customers, and end users of their Accused Products and corresponding systems and services directly infringe at least claim 1 of the ’088 Patent, literally or under the doctrine of equivalents, at least by using the Accused Products and corresponding systems and services, as described above.

347. Defendants have actively induced and are actively inducing infringement of at least claim 1 of the ’088 Patent with specific intent to induce infringement, and/or willful blindness to the possibility that their acts induce infringement, in violation of 35 U.S.C. § 271(b). For example, Defendants encourage and induce customers to use Genius Sports in a manner that infringes claim 1 of the ’088 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.

348. Defendants encourage, instruct, direct, and/or require third parties—including their certified partners and/or customers—to use the Accused Products in infringing ways.

[redacted]

349. Defendants further encourage and induce their customers to infringe claim 1 of the ’088 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 their video streaming software, and services in the United States.

350. 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, Defendants and/or Defendants’ partners affirmatively aid and abet each customer’s use of the Accused Products in a manner that infringes the ’088 Patent.

351. Defendants also contribute to the infringement of their 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.

352. 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 ’088 Patent, that functionality could not be performed.

[redacted]

353. 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 ’088 Patent, that functionality could not be performed.

354. In addition, as shown in the detailed analysis above, the products, systems, modules, and methods provided by Defendants 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 ’088 Patent. None of these products are staple goods—they are sophisticated and customized video-streaming products, methods, and systems.

355. 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, Defendants direct and control the activities or actions of their 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. Defendants further direct and control the operation

[redacted]

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 claim 1 of the ’088 Patent.

356. Plaintiff has suffered and continues to suffer damages, including lost profits, as a result of Defendants’ infringement of the ’088 Patent. Defendants are therefore liable to Plaintiff under 35 U.S.C. § 284 for damages in an amount that adequately compensates Plaintiff for Defendants’ infringement, but no less than a reasonable royalty.

357. Plaintiff will continue to suffer irreparable harm unless this Court preliminarily and permanently enjoins Defendants, their agents, employees, representatives, and all others acting in concert with Defendants from infringing the ’088 Patent.

358. Defendants’ infringement of the ’088 Patent is knowing and willful. Defendants acquired actual knowledge of the ’088 Patent at least upon the filing of this First Amended Complaint. Further, Plaintiff provided affirmative notice of the ’088 Patent to Defendants by sending a letter on April 17, 2024, informing Defendants of their infringement of the ’088 Patent.

359. On information and belief, despite Defendants’ knowledge of the Asserted Patents and Plaintiff’s patented technologies, Defendants made the deliberate decision to sell products and services that it knew infringe the ’088 Patent. Defendants’ continued infringement of the ’088 Patent with knowledge of the ’088 Patent constitutes willful infringement.

360. Plaintiff’s allegations of direct infringement, indirect infringement, and willful infringement with respect to this patent are further set forth in Exhibit 8.

FIFTH CAUSE OF ACTION
(Unlawful Tying Arrangement Under 15 U.S.C. § 1)

361. PANDA incorporates the preceding paragraphs as though fully set forth herein.

362. The Tying and Tied Markets in the United States are well-defined and distinct relevant markets.

[redacted]

363. Genius Sports has monopoly power in the Tying Markets, as evidenced by its dominant market share and various other indicia of monopoly power described herein.

364. Genius Sports has market power in the Alternative Tying Market, as evidenced by its large market share and various other indicia of market power described herein.

365. Genius Sports has unlawfully tied its exclusive access to official NFL, NCAA, and Premier League data to the use and purchase of its own sports betting app technology.

366. As demonstrated herein, all markets are separate and distinct, including the Tying markets.

367. Genius Sports coerces customers to use and purchase its own sports betting app technology, and thereby forecloses competition from would-be rivals in the Tied Market.

368. Genius Sports' conduct affects a substantial volume of commerce in the Tied Market.

369. Genius Sports has thus engaged in a *per se* illegal tying arrangement.

370. In the alternative, even if Genius Sports' tying conduct does not constitute a *per se* violation of the law, a rule-of-reason analysis of Genius Sports' tying arrangement also would demonstrate that it violates the law.

371. There is no valid business necessity or pro-competitive justification for Genius Sports' tying conduct.

372. PANDA has been injured, and will continue to be injured, in its business and property as a result of Genius Sports' conduct.

373. Genius Sports' exclusionary conduct has caused substantial harm to competition and specific, cognizable antitrust injuries to PANDA.

374. Genius Sports' conduct has occurred in and affected interstate commerce.

[redacted]

SIXTH CAUSE OF ACTION
(Texas Free Enterprise and Antitrust Act of 1983, Tex. Bus. & Comm. Code § 15.01, *et seq*.)

375. PANDA incorporates the preceding paragraphs as though fully set forth herein.

376. The Tying and Tied Markets in the United States are well-defined and distinct markets.

377. Genius Sports has substantial market or monopoly power in the Tying Markets, as evidenced by its dominant market share and various other indicia of monopoly power described herein. Genius Sports, through its unlawful tying arrangement, has also gained considerable market power in the Tied Market.

378. Genius Sports has market power in the Alternative Tying Market, as evidenced by its large market share and various other indicia of market power described herein.

379. Genius Sports has used its unlawful tying arrangement to restrain trade and limit or exclude competition from PANDA and other rivals. There is no legitimate business justification for this conduct.

380. This course of conduct, among other things, violates Sections 15.05 of the Texas Free Enterprise and Antitrust Act.

381. Genius Sports competes with PANDA in the Tying Markets throughout the United States, including in Texas.

382. Genius Sports' exclusionary conduct has caused substantial harm to competition and specific, cognizable antitrust injuries to PANDA.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

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

[redacted]

b) That this Court award damages to Plaintiff to compensate Plaintiff for Defendants' 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 Defendants from infringing any of the Asserted Patents;

h) That this Court order Defendants 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 Defendants 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;

[redacted]

and

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

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

j) That this Court enter judgment against Defendants for violations of Section 1 of the Sherman Act and the Texas Free Enterprise and Antitrust Act;

k) That this Court impose permanent injunctive relief against Defendants and their officers, employees, agents, attorneys, affiliates, successors, assigns, and others acting in privity or concert with them, and their parents, subsidiaries, divisions, successors and assigns, prohibiting Defendants from committing further violations of Section 1 of the Sherman Act and Texas Free Enterprise and Antitrust Act violations, and specifically requiring that Defendants discontinue the anticompetitive and unfair acts and practices that give rise to PANDA's claims herein;

l) That this Court award damages to Plaintiff in an amount adequate to fully compensate for the injuries to Plaintiff's business, including but not limited to lost profits, caused by Defendants' unlawful behavior under federal and state antitrust laws;

m) That this Court award Plaintiff treble damages, along with its reasonable attorneys' fees, for Defendants' violations of the federal and state antitrust laws;

m) That this Court award Plaintiff its costs and attorneys' fees; and

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

[redacted]

DEMAND FOR JURY TRIAL

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

Dated: February 14, 2025

Respectfully submitted:

By: /*s/ Christopher C. Campbell*
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record have been served with a copy of the foregoing document via electronic mail February 14, 2025.

/s/ Christopher C. Campbell
Christopher C. Campbell

CERTIFICATE OF AUTHORIZATION TO SEAL

I hereby certify that pursuant to the protective order in the above-captioned case, this Third Amended Complaint and/or exhibits thereto contains confidential information. Accordingly, this document is to be filed under seal.

/s/ Christopher C. Campbell
Christopher C. Campbell