

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

SPORTSCASTR INC.	)	
(d/b/a PANDA INTERACTIVE),	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 2:23-cv-471-
	)	JRG (E.D. Tex.)
	)	
GENIUS SPORTS LTD.,	)	JURY TRIAL DEMANDED
GENIUS SPORTS MEDIA LTD.	)	
GENIUS SPORTS TECHNOLOGIES LTD.	)	
GENIUS SPORTS UK LTD.	)	
GENIUS SPORTS HOLDINGS LTD.	)	
GENIUS SPORTS GROUP LTD.	)	
MAVEN TOPCO LTD.	)	
MAVEN MIDCO LTD.	)	
MAVEN DEBTCO LTD.	)	
MAVEN BIDCO LTD.	)	
	)	
Defendants.	)	
	)	

SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT

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

1. PANDA developed, built and has obtained numerous patents covering, revolutionary Internet technology for the delivery of broadcasts that are enhanced with synchronized, contextually matched, and actionable live data and content. For example, this technology enables viewers to see live odds and to place a bet while watching a sporting event. PANDA’s technology is ultra-low latency, push-based and scalable to millions of viewers. It has

been widely copied in the streaming market generally, and even more so in the exploding online sports betting market. PANDA's patented technology underpins the sports streaming industry's offerings; but those offerings, including Defendants' offerings are without license or authorization and infringe PANDA's patents.

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

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

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

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

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

7. Relatedly, conventional live video streaming systems also struggle to synchronize the broadcasting among multiple viewers. The offset between different viewers can become especially significant when they watch videos of different qualities or use network connections having different bandwidths.

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

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

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

11. Plaintiff's patented technologies, on the other hand, employ a novel socket server architecture, in which a socket may be dedicated to a live stream to all viewers watching that live stream. For example, Plaintiff's patented technologies allow multiple users to connect to the same event socket, thereby achieving a one-to-many socket architecture. Plaintiff's patented technologies' use of a one-to-many socket architecture was counter to the then-conventional

understanding and use of sockets. For example, prior art socket architectures were not designed or used for the delivery of interactive and synchronous content alongside live video streams, let alone multi-cast (or one-to-many) delivery of content over a single unauthenticated socket. Rather, prior art sockets were used in specific and limited applications, such as for chat rooms, delivering update notifications, or other lower data-rate information, where each individual user was connected to a separate socket and given a unique user id. (See, PANDA_000182-PANDA_000195, <https://web.archive.org/web/20160307174809/http://blog.pusher.com/using-your-real-time-data-features/>.)

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

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

systems which required contextual information to be embedded in the video stream itself, increasing processing delays and requiring special license and media rights held by only a few individuals.

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

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

16. Plaintiff currently owns numerous patents and pending patent applications describing and claiming these technologies and other innovations, including U.S. Patent Nos. 10,805,687 ("the '687 Patent"), 11,039,218 ("the '218 Patent"), 10,425,697 ("the '697 Patent"), and 11,871,088 ("the '088 Patent").

17. 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.

18. 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). 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

19. Plaintiff brings claims under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*, for infringement of the Asserted Patents. 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).

THE PARTIES

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

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

22. Plaintiff is a registered business in Delaware.

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

24. 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.

25. 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.

26. 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.

27. 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.

28. 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.

29. 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.

30. 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.

31. 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.

32. 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

33. 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).

34. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c) and 28 U.S.C. § 1400(b). Upon information and belief, 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.

35. 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.

36. 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:



(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.

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

38. 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. (See, 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>.)

39. 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. (See, PANDA_000132-PANDA_000135, https://www.bettexas.com/news/Genius_Sports-s-brandt-iden-bullish-on-texas-sports-betting-being-legalized. See also, PANDA_000206-PANDA_000208, <https://www.gamingtoday.com/news/louisiana-sports-betting-texans-crossing-state-border-impact/>.)

40. 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/.](https://www.statesman.com/story/news/politics/state/2023/03/24/texas-legislature-sports-betting-gambling-casino-rick-perry-jeff-leach/70042725007/))

41. 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. (See, PANDA_000009-PANDA_000014, <https://www.cnn.com/2021/08/05/draftkings-partners-with-genius-sports-for-sports-betting.html>.) As previously noted, Genius Sports has exclusive data rights with the NFL, and the NFL's "Hub" for all eight of the League's teams is located in Arlington, TX. (See, Bates Number PANDA_000019-PANDA_000020, <https://www.arlingtontx.gov/news/my-arlington-tx/news-stories/nfl-hub-arlington>.) Arlington's Choctaw Stadium serves as the in-week practice facility for both the Arlington Renegades and the Houston Roughnecks, and it is the home stadium for the Arlington Renegades.



(See, PANDA_000019 at PANDA_000020, <https://www.arlingtontx.gov/news/my-arlington-tx/news-stories/xfl-hub-arlington>.)

42. 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.

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

44. On information and belief, Genius Sports and/or its partners intentionally use and profit from data and video from professional and college-level Texas sports teams through the Accused Products. For example, Genius Sports has partnered with the NCAA to develop the NCAA LiveStats solution, which provides a statistics technology platform for various college-level sports, including basketball, volleyball, soccer and football. (See, PANDA_000512-

[REDACTED]

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.)

45. [REDACTED]

[REDACTED]

[REDACTED]

46. 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

47. Genius Sports Ltd. is a publicly traded company [REDACTED]

[REDACTED]

[REDACTED]

GS_00015289.

48. 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”:

<p style="text-align: center;">Genius Sports Limited Notes to Condensed Consolidated Financial Statements (Unaudited)</p> <p>Note 1. Description of Business and Summary of Significant Accounting Policies</p> <p><i>Description of Business</i></p> <p>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”.</p> <p>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.</p>

<https://d18rn0p25nwr6d.cloudfront.net/CIK-0001834489/ce4824d5-ea8f-435d-9036->

[c1c1e27970ae.pdf](#)

49. Genius Sports [REDACTED]

[REDACTED]. For example, [REDACTED]

[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.

<https://www.geniussports.com/newsroom/nfl-extends-strategic-partnership-with-genius-sports-as-exclusive-official-data-watch-bet-partner/>

50. 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.

51. According to Genius Sports Ltd., [REDACTED]

[REDACTED]. [REDACTED]

[REDACTED]

[REDACTED]. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

52. 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.

53. 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.

54. Mr. Davison is listed on Genius Sports' website as its Chief Commercial Officer without any distinction between the companies that make up the Genius Sports corporate family. Mr. Davison has [REDACTED]

[REDACTED]

[REDACTED]. For example, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. GS_00013369. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

GS_00013369, at 1.

[REDACTED]

[REDACTED]

Id. at 7.

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

[REDACTED]

[REDACTED]. (See First Supplemental Response to PANDA's Interrogatory No. 9.)

[REDACTED]

56. 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.

<https://www.sportico.com/business/finance/2023/genius-sports-q3-earnings-1234746433/>.

57. 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.

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

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

58. 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 Services."

59. 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.*

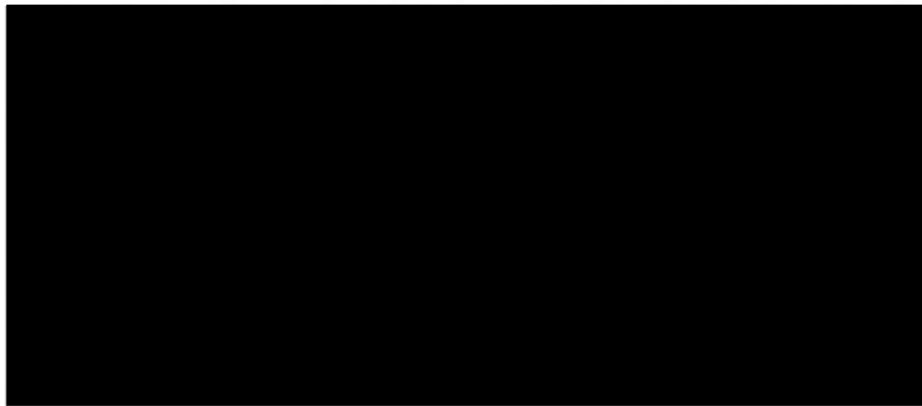
60. Genius Sports CEO, Locke, further noted that "Genius takes about three times as

[REDACTED]

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.*

61. 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.

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



63. 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/or importing of the Accused Products) and recognizing the revenue (or at least the value) from that infringing activity ([REDACTED])
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

64. [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.

65. 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.

<https://d18rn0p25nwr6d.cloudfront.net/CIK-0001834489/ce4824d5-ea8f-435d-9036-c1c1e27970ae.pdf> at 24.

66. 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 United 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.

67. 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.

68. 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.

69. 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

70. 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.

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

72. The '687, '218, and '697 Patents are part of the same patent family and the '088 Patent is in a different family, and they 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.

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

74. 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.

75. 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.

76. 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 provisional patent application No. 62/507,158, filed on May 16, 2017. A true and correct copy of the '088 Patent is attached as Exhibit 7.

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

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

79. 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.)

80. By contrast, the methods and systems disclosed and claimed in the Asserted Patents provide a novel and specific technological improvement over the prior art, by among other things, performing live video streaming that is enhanced with a one-to-many socket architecture for real-time, contextually matched and actionable event information, in which one socket of a socket server dedicated to a particular event allows multiple viewer client devices to establish an event information channel with the socket server, such that the event information is shared in a synchronized manner by all broadcasters/viewers following the particular event. (Exhibit 2, '218 Patent, at 20:16-30; 21:56-22:4; 22:26-57; 23:4-18; 27:23-45; 29:43-61; 53:34-50.) To this end, the patented technologies use a web server to provide viewers with an identifier of the particular event, also referred to as EventID, which corresponds to the socket dedicated to a particular event. Viewers who are interested in watching the live stream of the particular event can then use the received EventID to connect to the dedicated server. In response, the socket server transmits the event information associated with the particular event back to the viewers via an event information channel. (Exhibit 2, '218 Patent, at 22:5-25; 23:37-63.)

81. The event information channel that is configured to transmit event information to viewers is separate from a video channel that is configured to transmit video signals, which can be the live video of the event being streamed or any other video-based commentary (e.g., provided

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

82. 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.

83. In addition, the Asserted Patents improve the technical functioning of the computer network using techniques, such as one-to-many socket architecture and separate communication channels for video and other event information. The architectural difference between the patented technologies and prior art systems effectively addresses identified weaknesses in conventional systems and processes. (*See, e.g.*, Exhibit 2, '218 Patent, at 26:37-27:45; 28:59-29:61.)

84. For example, one technical challenge overcome by the inventive concepts described and claimed in the Asserted Patents relates to the display of event information updates (if present, *e.g.*, if the broadcast is associated with an event), as well as screen animations and

other special effects graphics that may be generally associated with the video associated with a live stream, in a manner that is synchronized across multiple live streams with appreciably low latency. This is a particularly relevant consideration when multiple broadcasters are providing video-based commentary for the same event, and each of these broadcasters may have multiple viewers of their broadcast. Accordingly, the technical challenge is to provide the same event information, and periodic updates to this event information, in a synchronized and low-latency manner to all of these broadcasters and viewers interested in following the same event. (Exhibit 2, '218 Patent, at 26:39-56.)

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

86. As discussed above, event information and updates to event information are provided to broadcaster client devices and viewer client devices via a socket-based “event information channel” dedicated to the event, which is separate from the copy of the live stream of video-based commentary provided on a “video channel.” Thus, all viewers and broadcasters of the event, regardless of which live stream they may be generating or watching, connect to one or more sockets of a socket server that is/are dedicated to the event, such that all live streams relating to the event are similarly synchronized to event information and updates to same. (Exhibit 2, '218 Patent, at 27:1-13.)

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

88. 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.

89. Unlike conventional systems, in the technological solution offered by the Asserted Patents, graphics and effects are generated by the client device itself, separate from a given broadcaster’s video-based commentary or other video signals, and then integrated with (*e.g.*, superimposed or overlaid on) the broadcaster’s video-based commentary or other video signals when rendered on the display of the client device. (Exhibit 2, '218 Patent, at 28:65-29:10).

90. 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

91. Defendants offer, 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.

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

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

94. 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 overlaid event information germane to the sporting event.

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

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

96. 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.

97. 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.

98. 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

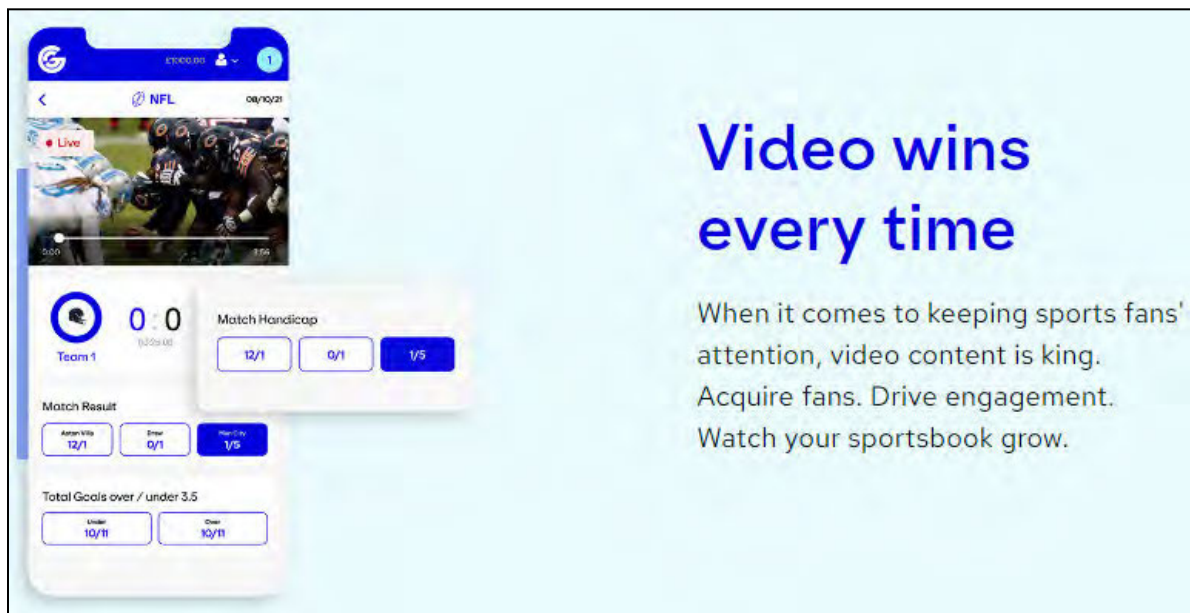
in C), the at least one socket server:

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.

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



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

100. 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>.)

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

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

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

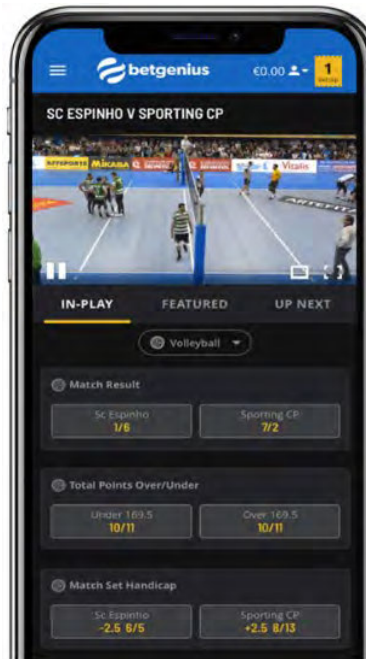
Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipsport will have access to Genius Sports' full NFL product suite, including access to the league's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

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

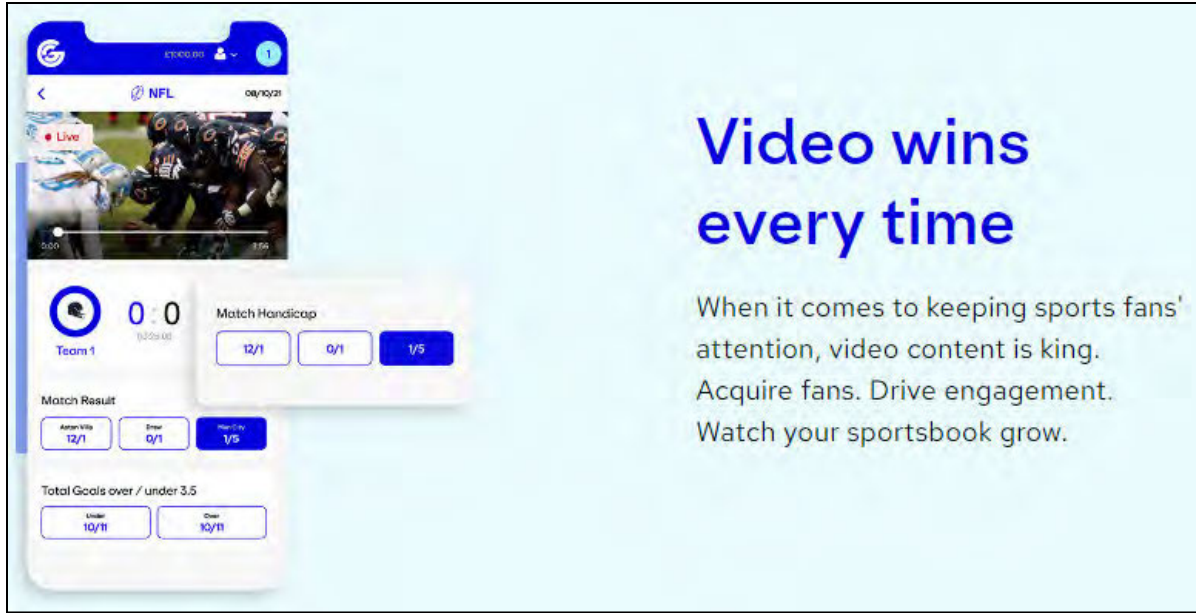
(See, PANDA_000176-PANDA_000177, <https://geniussports.com/newsroom/genius-sports-builds-out-official-data-trading-and-live-streaming-partnership-with-tipsport/>.) Genius Sports is also the NFL's official data distributor, providing low-latency video feeds of live sporting events and allowing fans to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

[nfl-same-screen](#).) Genius Sports also delivers live streams of various other sporting events within the United States.

102. 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.

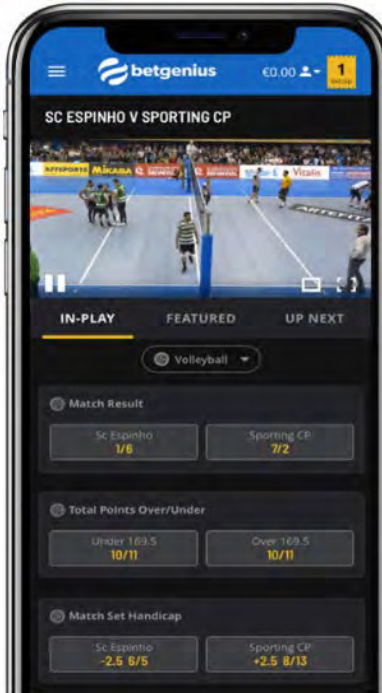


(See, PANDA_000015, <https://investors.geniussports.com/news/news-details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx>.)



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

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



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

104. 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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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>.)

105. 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.

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

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

```

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

```

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

```

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

```

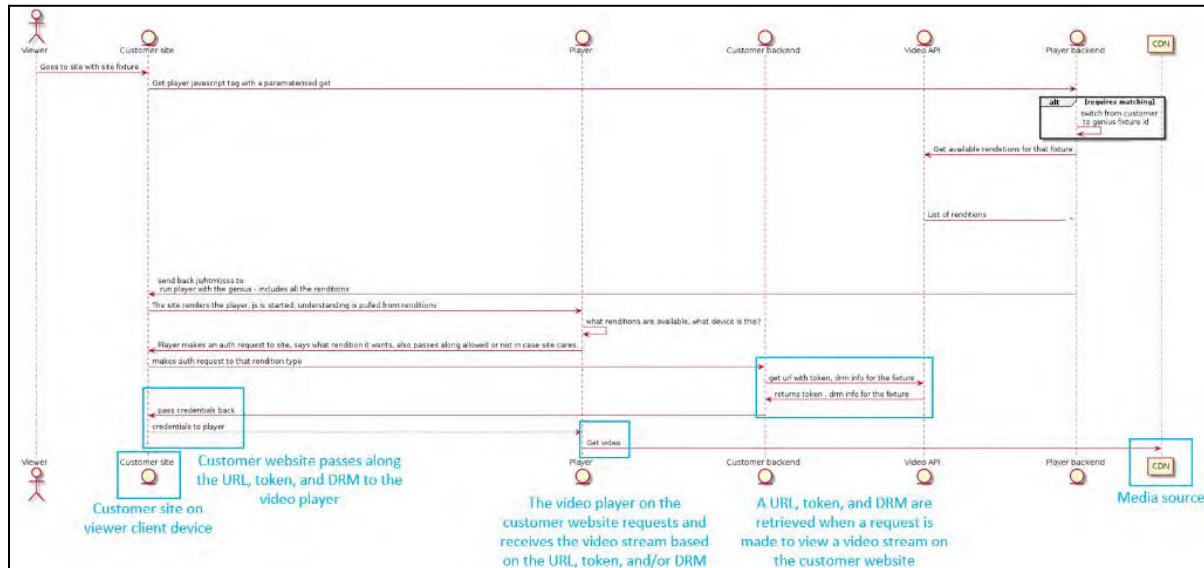
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

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

Our API should never be called from the browser directly.

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



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

107. 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 3.0.31

Base URL: `api.geniussports.com/Video/v3/PRODSTD`
<https://explorer.api.geniussports.com/Video/v3/PRODSTD/swagger-latest.json>

Video Streaming API

The video streaming API is used by customers to:

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

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

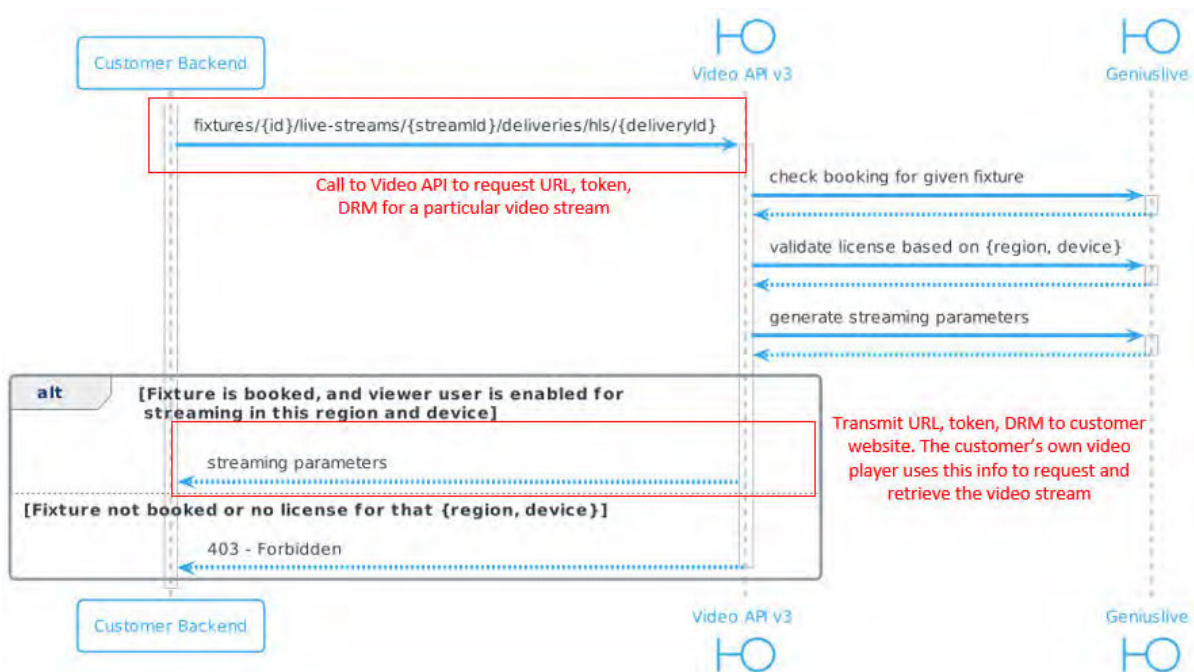
Player integration

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

Playing the content

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

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



(See, PANDA_00217, PANDA_00222,

<https://swaggerui.api.geniussports.com/?url=https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json>.)

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

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

Schedule

This is where you select the booked fixtures for viewing.

For each fixture, you will see the following information:

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

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

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

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

(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 - 75 mins
- Between 75 - 90 mins
- First Half
- Second Half
- Since last Goal
- Since last Red Card
- Extra-time

(See, PANDA_000196 at PANDA_000200-PANDA_000201,

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

109. 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>.)

110. 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/>.)

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

Introduction

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

Connection

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

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

RAW

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

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

Example - HTTP

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

Example - RAW

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

(See, PANDA_000139-PANDA_000141,

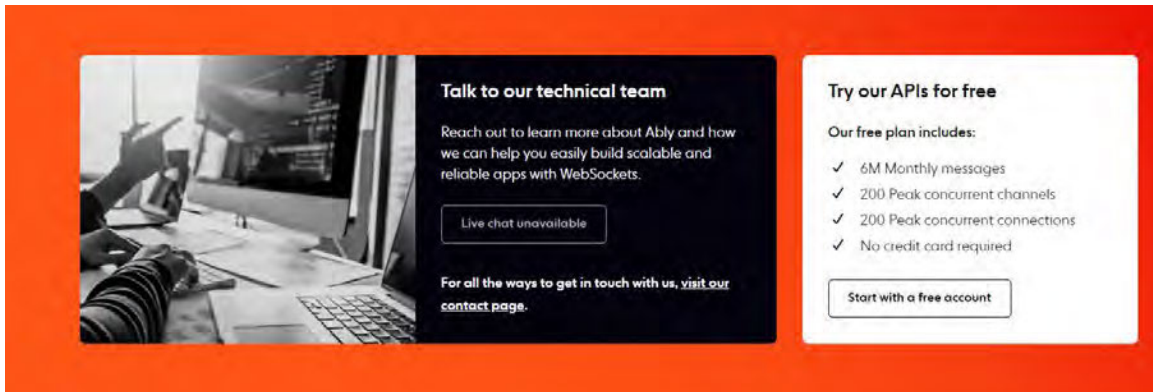
https://developer.geniusports.com/warehouse/livestream/publish/index_football.html.)

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

Infrastructure teams can “sleep easy” and developers are free to innovate

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

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



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

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

In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.

It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

(See, PANDA_000065,

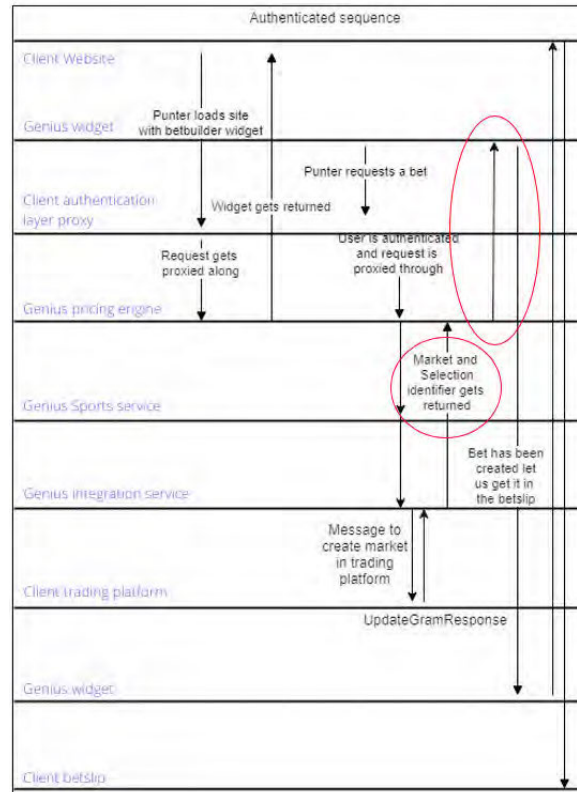
<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.>)

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.>)

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



(See, PANDA_000001,

<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284776797/Authenticating+User-Session+Using+a+Proxy+Service.>)

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

Multibet Widget Integration

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

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

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

(See, PANDA_000065,

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

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

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

(See, PANDA_000077,

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

SmartStream Release Process

SmartStream is released to its 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.



```

graph LR
    A[Development] -- Two weeks --> B[UAT]
    B -- Two weeks --> C[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/betstream"
<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://bsc
  
```

(See, PANDA_000077-PANDA_000078,

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

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

More in-play profits

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

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

Score
Stats

2 - 1

51:24
(HT 2-0)

MultiBet
Main
Handicaps

5 My Selections ▼

Match Result - Brazil

Total Goals Over/Under - Brazil O 2.5

First Goal Scorer - Neymar

Total Corners - O 9.5

Player Cards - G. Khaka

Add to betslip

Total Odds 51.00

(See, PANDA_000111 at PANDA_000112-PANDA_000113,

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

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

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

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

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

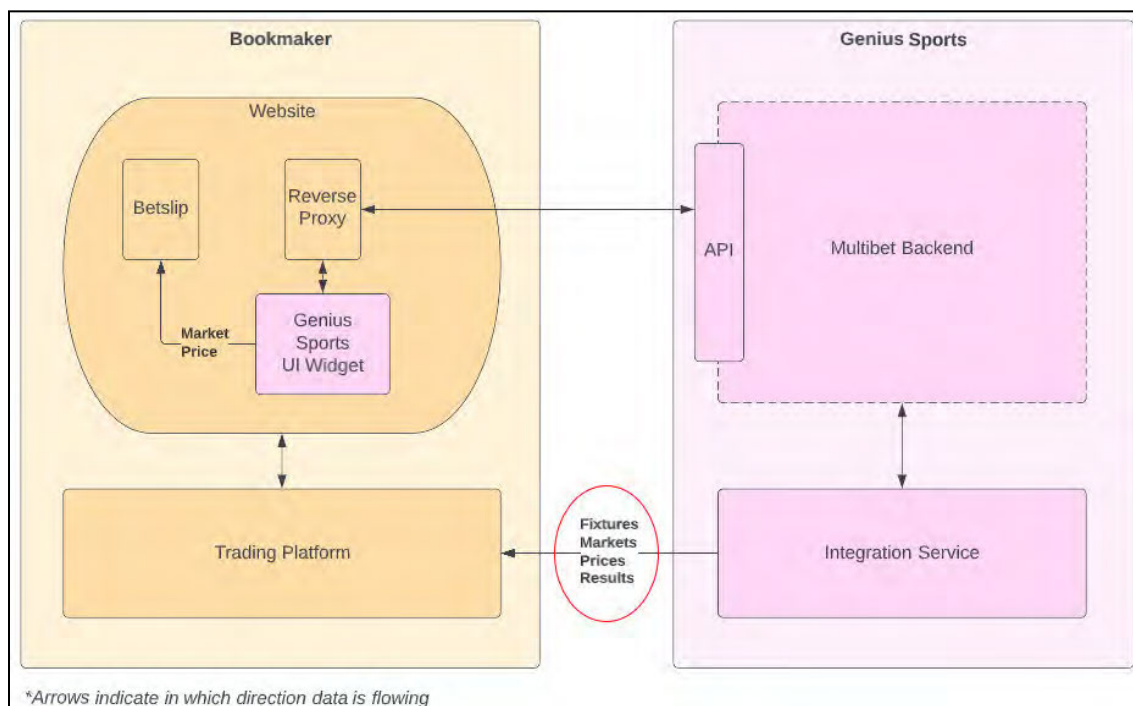
Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

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

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

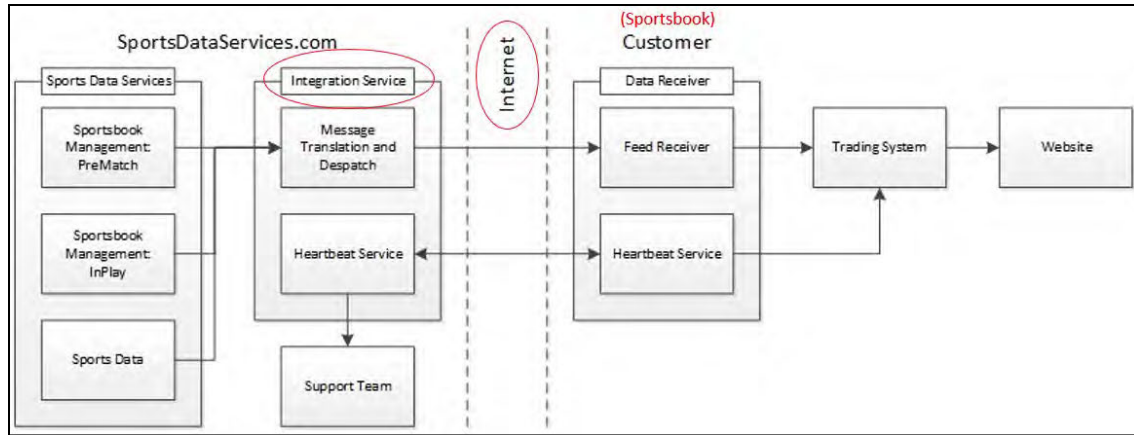
(See, PANDA_000179-PANDA_000180, <https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/>.)

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



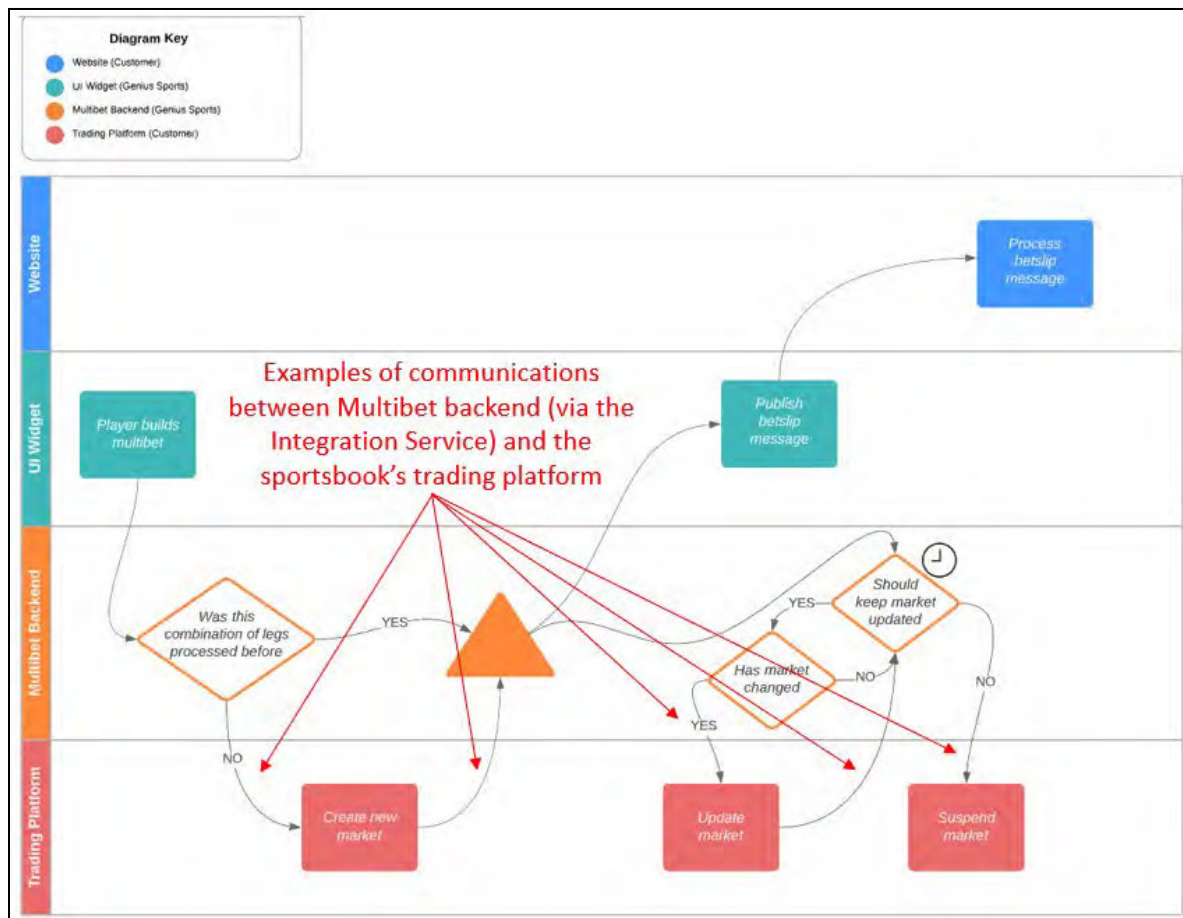
(See, PANDA_00212 at PANDA_00213,

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



(See, PANDA_000539,

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



118. 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.

119. 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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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>.)

120. 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.

121. 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.

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(See, PANDA_000065,

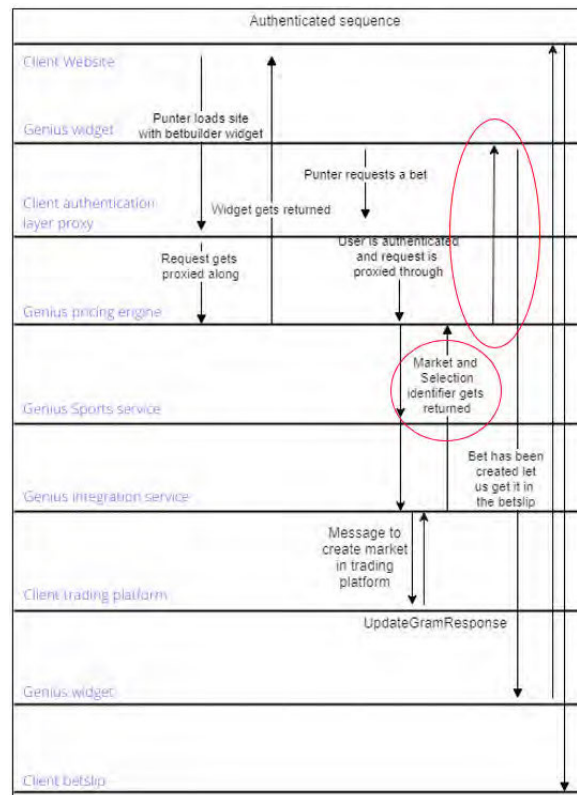
<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.>)

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.>)

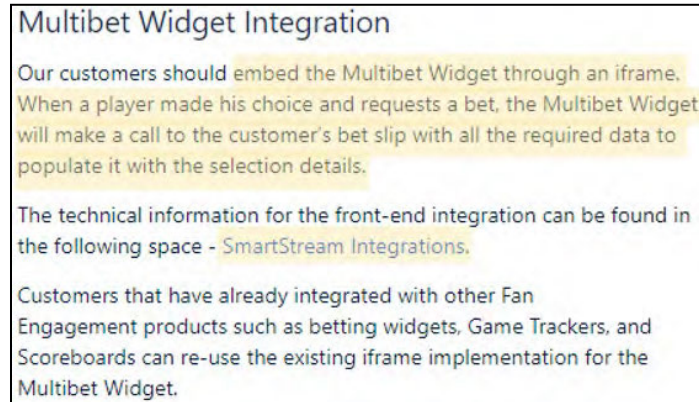
122. The screenshot below confirms that Genius Sports transmits at least the bet generated by the sportsbook's trading platform to Genius widget on client's device (e.g., a computer, a laptop, a smartphone or a tablet) via the Internet.



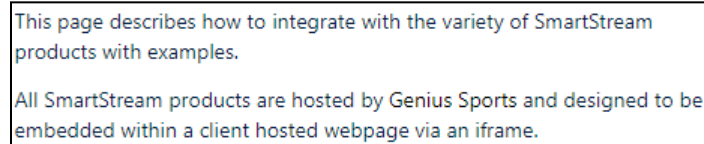
(See, PANDA_000001,

<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4284776797/Authenticated+User-Session+Using+a+Proxy+Service.>)

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



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



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

SmartStream Release Process

SmartStream is released to its 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.



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```
<script src="https://bsdemo.betstream.betgenius.com/betstream"
</script>
<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://bsdemo.betstream.betgenius.com/betstream"
</iframe>
```

(See, PANDA_000077-PANDA_000078,

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

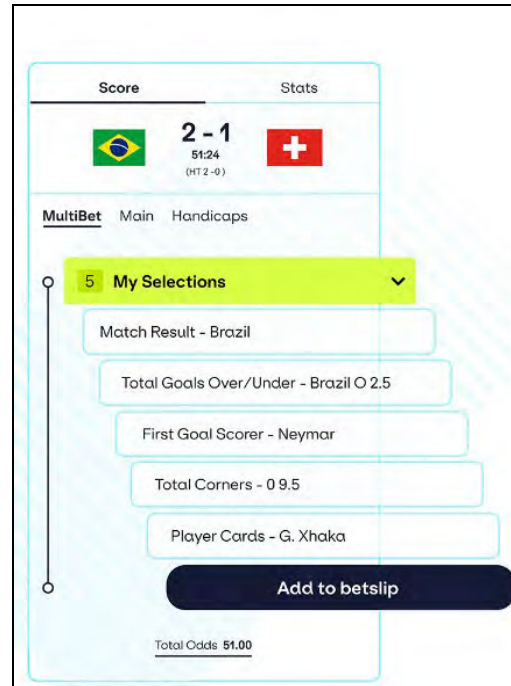
124. Genius Sports offers several data-related product offerings to provide sportsbooks various data streams (betting data, sports data). In one example, Genius Sports' streaming product uses Multibet, which allows end users (e.g., bettors) to place same-game parlays during a sports match. Multibet is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

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

More in-play profits

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

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



(See, PANDA_000111 at PANDA_000112-PANDA_000113,

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

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

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

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

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

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

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

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

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

126. 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.

127. 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.

128. 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.

129. 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.

130. 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,

installation, support, and distribution of the Accused Products.

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

132. 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.

133. 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.

134. 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.

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

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

136. 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.

137. 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.

138. 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

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.

139. 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.

140. 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.

141. 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.

142. 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.

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

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

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

145. 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.

146. For example, claim 1 of the '218 Patent recites:

1. A system for controlling a plurality of viewer client devices to receive first digital content relating to a first sporting event and first event information germane to the first sporting event, the first event information including online gaming information, the system comprising:

A) a control server to periodically retrieve, via the Internet, the first event information germane to the first sporting event;

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

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

transmit at least some of the first event information, including the online gaming information, to at least a first viewer client device of the plurality of viewer client devices via a first event information Internet communication channel between a first event socket of the at least one socket server and the first viewer client device, wherein the first event socket corresponds to the first event information germane to the first sporting event; and

C) at least one webserver communicatively coupled to the at least one socket server to transmit, to the first viewer client device:

a first Internet address of a first media source to establish a first video Internet communication channel between the first media source and the first viewer client device to carry the first digital content relating to the first sporting event; and

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

147. Claim 4 of the '218 Patent, which depends from claim 1, recites:

4. The system of claim 1, wherein:

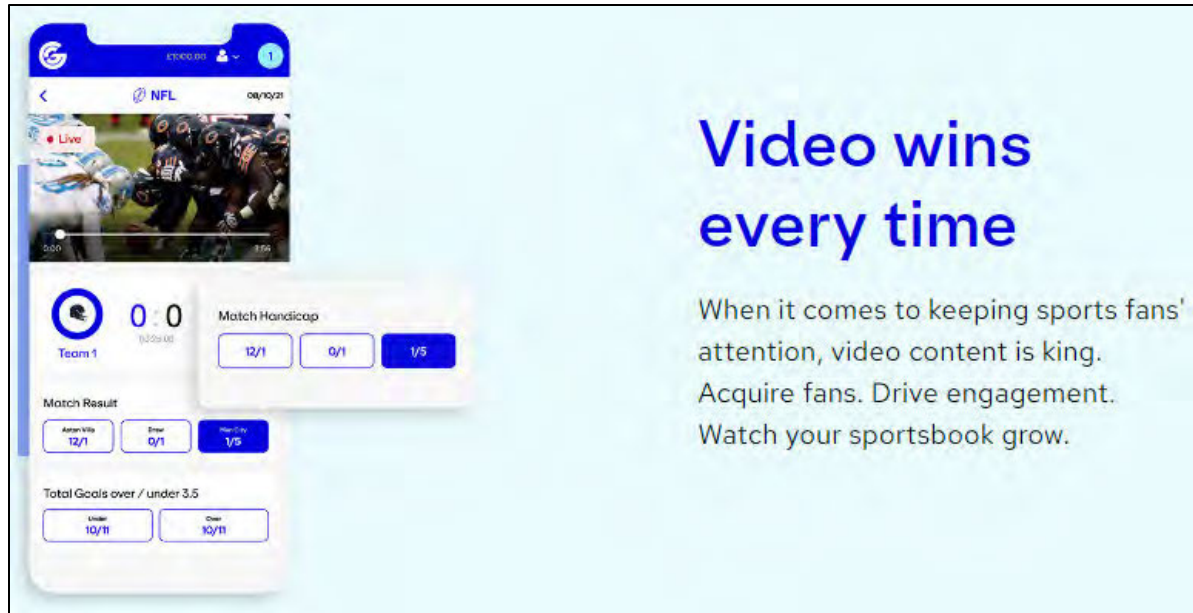
in C), the at least one webserver transmits, to a second viewer client device of the plurality of viewer client devices, the first socket address of the first event socket to establish a second event information Internet communication channel between the first event socket and the second viewer client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

148. 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.*

149. For example, Genius Sports' streaming product includes both a live stream of a sporting event and overlaid event information germane to the sporting event.



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

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

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

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

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

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

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

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

151. 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.

(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 - 75 mins
- Between 75 - 90 mins
- First Half
- Second Half
- Since last Goal
- Since last Red Card
- Extra-time

(See, PANDA_000196 at PANDA_000200-PANDA_000201,

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

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

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

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

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

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

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

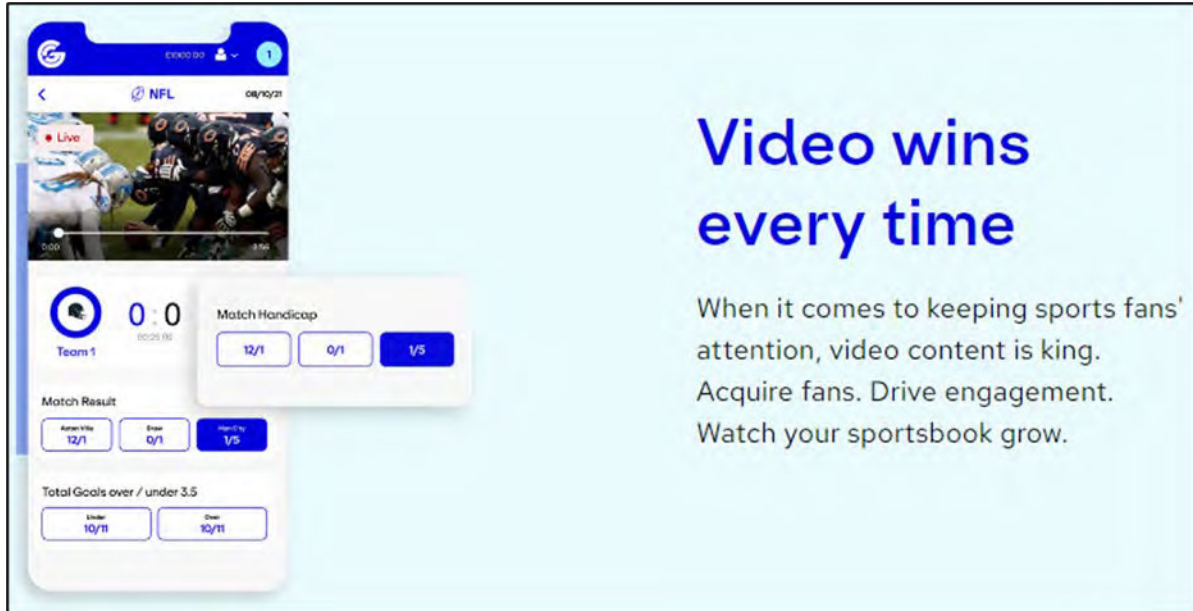
International operator bet365 is among the first sportsbooks to go live with the product, with more to be announced in the coming weeks.

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

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

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

[details/2019/Betgenius-launches-live-streaming-service-for-sportsbooks/default.aspx.](https://www.geniussports.com/sportsbook/streaming/))



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

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

Introduction

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

Connection

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

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

RAW

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

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

RAW

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

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

Example - HTTP

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

Example - RAW

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

(See PANDA_000139-PANDA_000141,

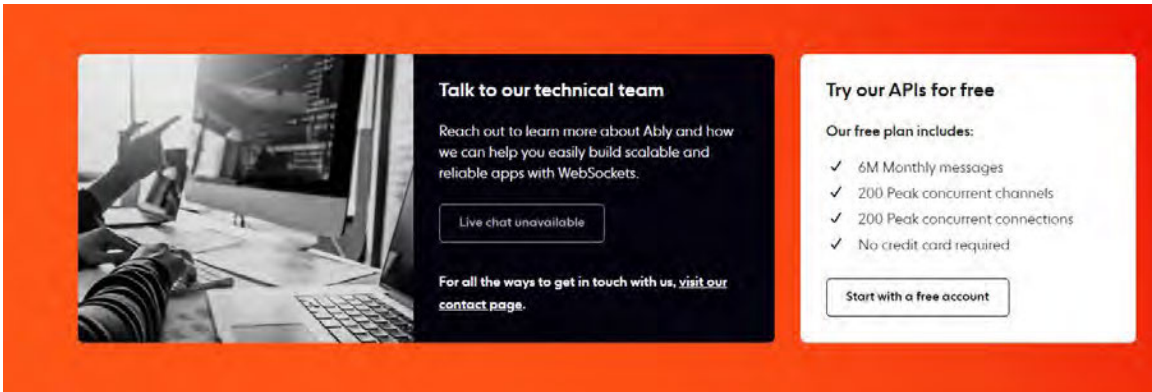
https://developer.geniusports.com/warehouse/livestream/publish/index_football.html.)

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

Infrastructure teams can “sleep easy” and developers are free to innovate

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

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



The screenshot shows a section of the Ably website with a dark blue background. On the left, there is a photo of a person's hands typing on a laptop keyboard. To the right of the photo, the text reads: "Talk to our technical team", "Reach out to learn more about Ably and how we can help you easily build scalable and reliable apps with WebSockets.", "Live chat unavailable", and "For all the ways to get in touch with us, visit our contact page." To the right of this text is a white box with the heading "Try our APIs for free" and a list of features: "Our free plan includes:", "✓ 6M Monthly messages", "✓ 200 Peak concurrent channels", "✓ 200 Peak concurrent connections", and "✓ No credit card required". At the bottom of the white box is a button that says "Start with a free account".

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

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

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

In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.

It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

(See, PANDA_000065,

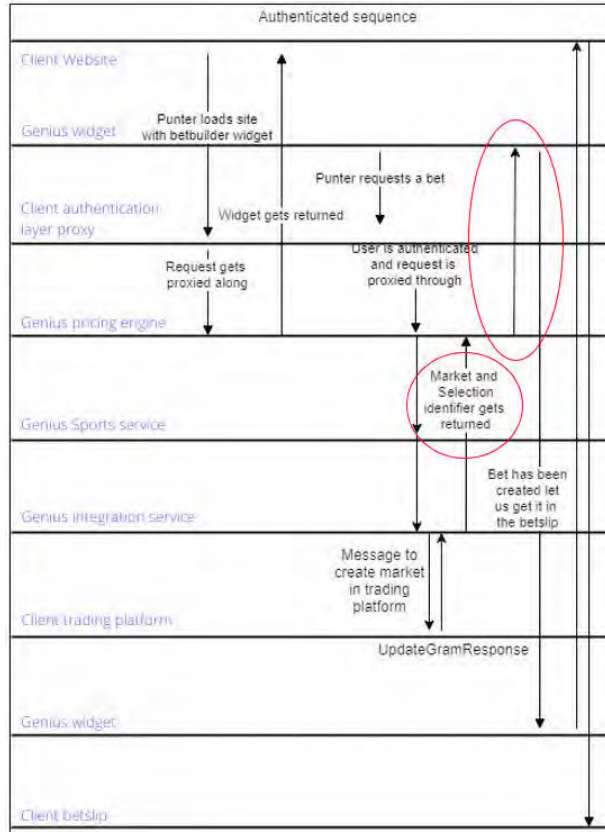
<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.>)

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.>)

156. 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.>)

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

Multibet Widget Integration

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

The technical information for the front-end integration can be found in the following space - [SmartStream Integrations](#).

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

(See, PANDA_000065,

<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front->

End+Integration.)

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

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

(See, PANDA_000077,

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

<h3>SmartStream Release Process</h3> <p>SmartStream is released to its 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.</p> <p>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.</p> <p>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.</p> <pre> graph LR Development[Development] -- Two weeks --> UAT[UAT] UAT -- Two weeks --> Production[Production] </pre>	<h3>Embedding a product</h3> <p>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.</p> <pre> <script src="https://bsdemo.betstream.betgenius.com/betstrear <script> var iframeApi = new IFrameApi("betgenius-iframe"); </script> </pre> <p>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.</p> <pre> <iframe scrolling="no" id="betgenius-iframe" src="https://bsc </pre>
--	---

(See, PANDA_000077-PANDA_000078,

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

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

More in-play profits

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

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

The screenshot displays a live match interface for Brazil vs. Switzerland (2-1) at 51:24 (HT 2-0). The 'MultiBet' section is active, showing a list of selections: Match Result - Brazil, Total Goals Over/Under - Brazil O 2.5, First Goal Scorer - Neymar, Total Corners - O 9.5, and Player Cards - G. Xhaka. A green bar at the top of the selections list indicates '5 My Selections'. An 'Add to betslip' button is visible at the bottom right of the selections list, and the 'Total Odds' are shown as 51.00.

(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

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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.

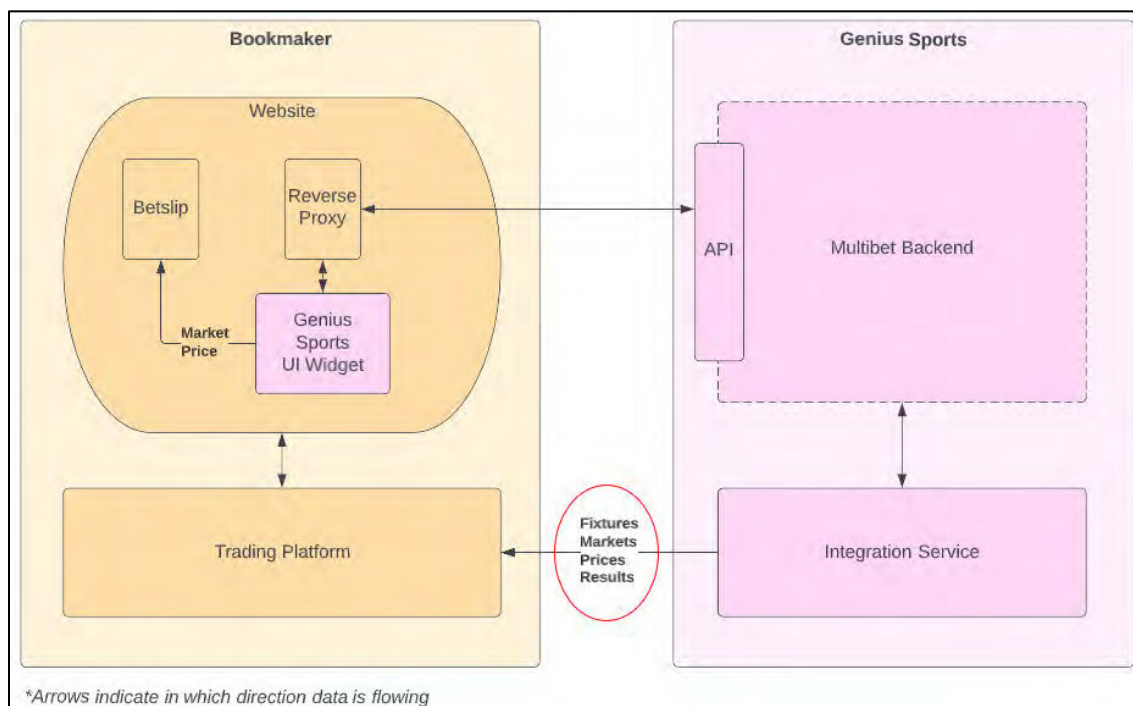
Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

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."

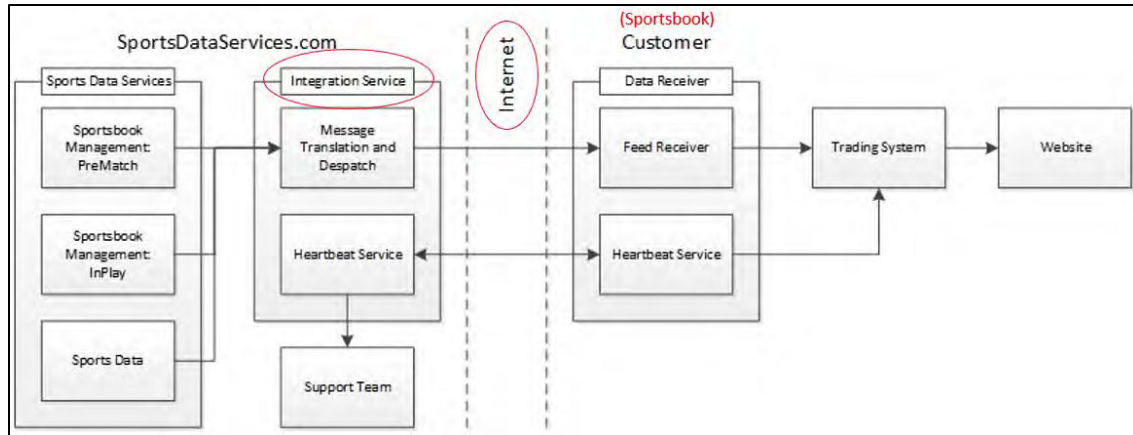
(See, PANDA_000179-PANDA_000180, <https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/>.)

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



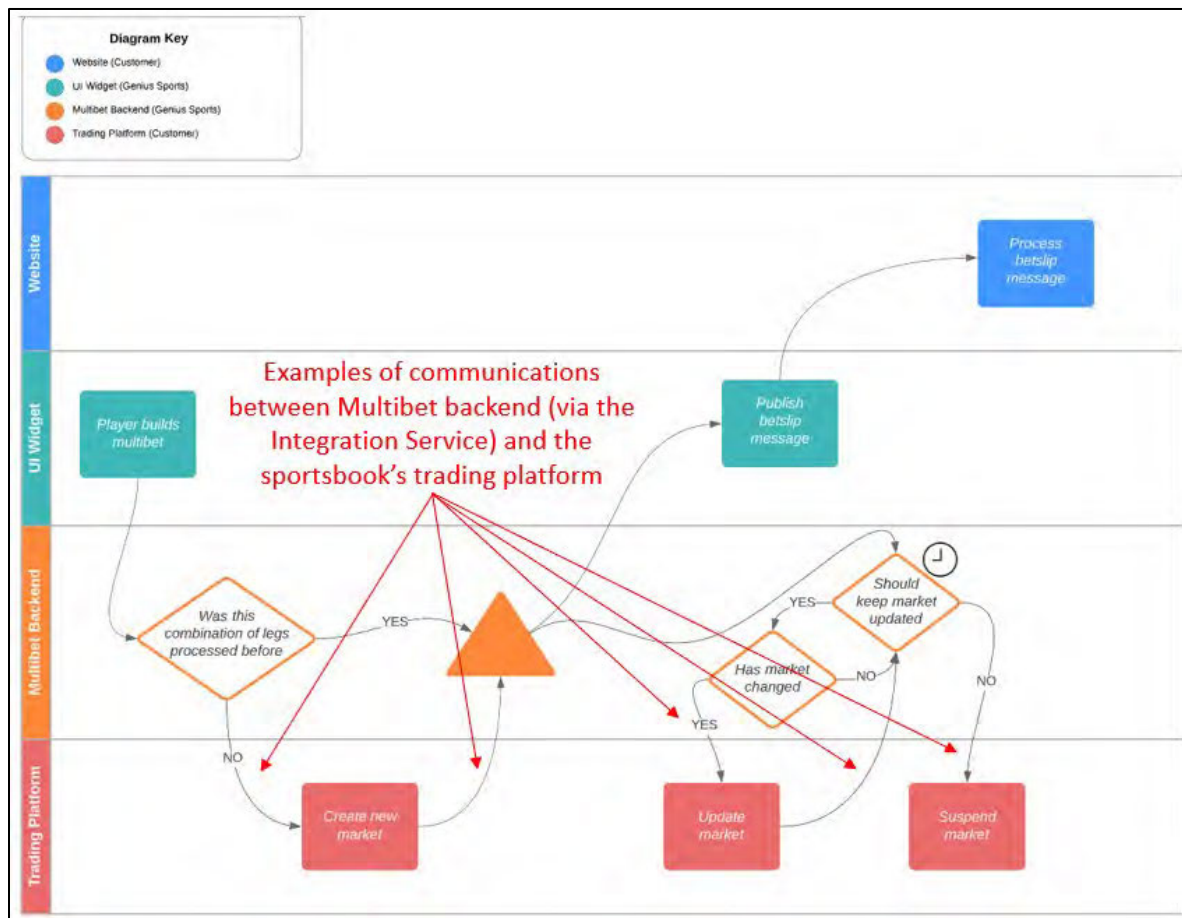
(See, PANDA_00212 at PANDA_00213,

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



(See, PANDA_000539,

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



(See, PANDA_00209 at PANDA_00210,

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

160. 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](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.

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.)

161. 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.*

162. 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."

(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 not be able to construct betsliips within the Multibet widget.

The widget, and all calls to get probabilities/prices should pass through a reverse proxy which ensures that the the person requesting the price or widget is known to the bookmaker.

The "Add-to-Betslip" action is a client side javascript initiated event which the bookmaker website or webview should be listening to. This event is described in more detail further down this document. When the punter adds to the betslip, a call is made through the reverse proxy to create the market in the bookmaker trading platform.

To allow the widget on the web to properly authenticate the exact solution described below needs to be implemented by the bookmaker for their reverse proxy which does authentication.

(See, PANDA_000228, <https://geniussports.atlassian.net/wiki/spaces/BID/pages/1277034498/Authenticating+user+session+using+a+proxy+service>.)

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

(See, PANDA_000228-PANDA_000229,

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

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.)

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

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

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

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

```

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

```

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

```

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

```

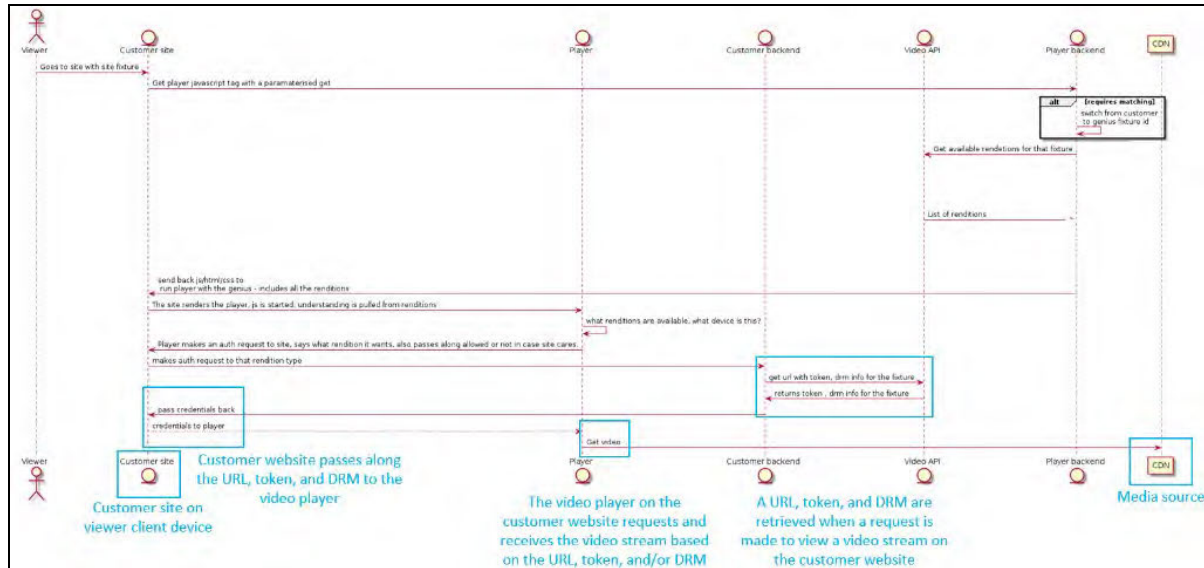
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

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

Our API should never be called from the browser directly.

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



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

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

GL-Video-v3 3.0.13
[Base URL: ap1.geniusports.com/V1deo-v3/PRODSTD]
<https://explorer.ap1.geniusports.com/V1deo/v3/PRODSTD/swagger-latest.json>

Video Streaming API

The video streaming API is used by customers to:

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

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

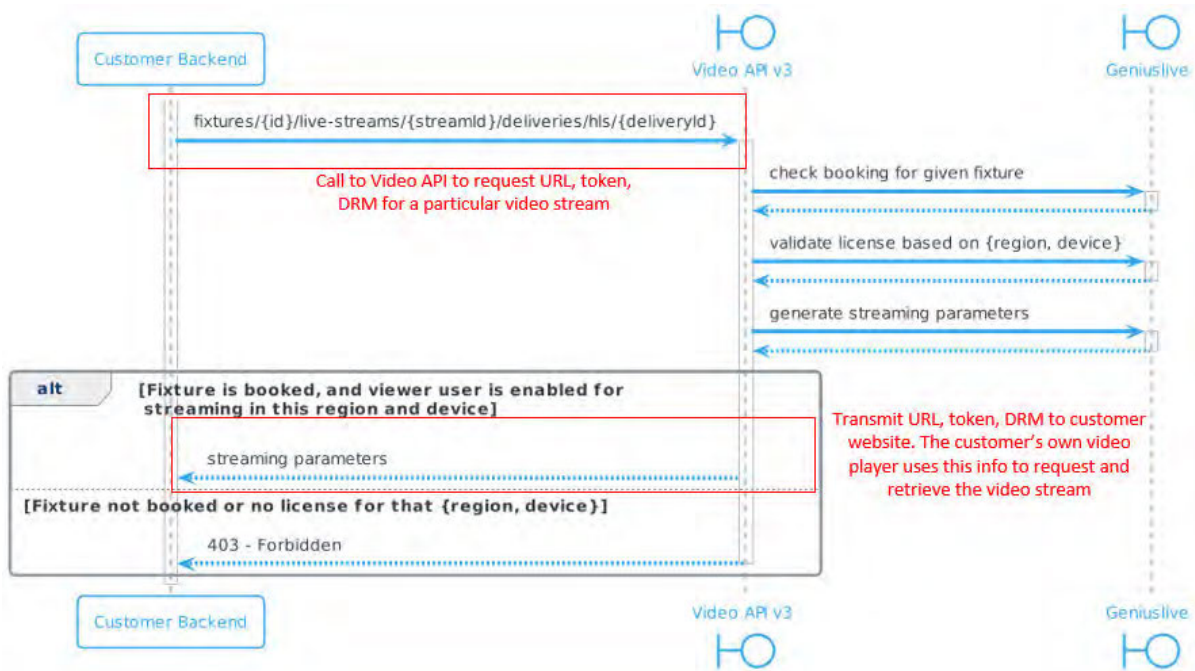
Player integration

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

Playing the content

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

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



(See, PANDA_00217, PANDA_00222,

<https://swaggerui.api.geniussports.com/?url=https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json>.)

166. 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.

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

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

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

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

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

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

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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>.)

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

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   customerId=YOUR_CUSTOMER_ID&fixtureId=YOUR_FIXTURE_ID">
3 </script>
```

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

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

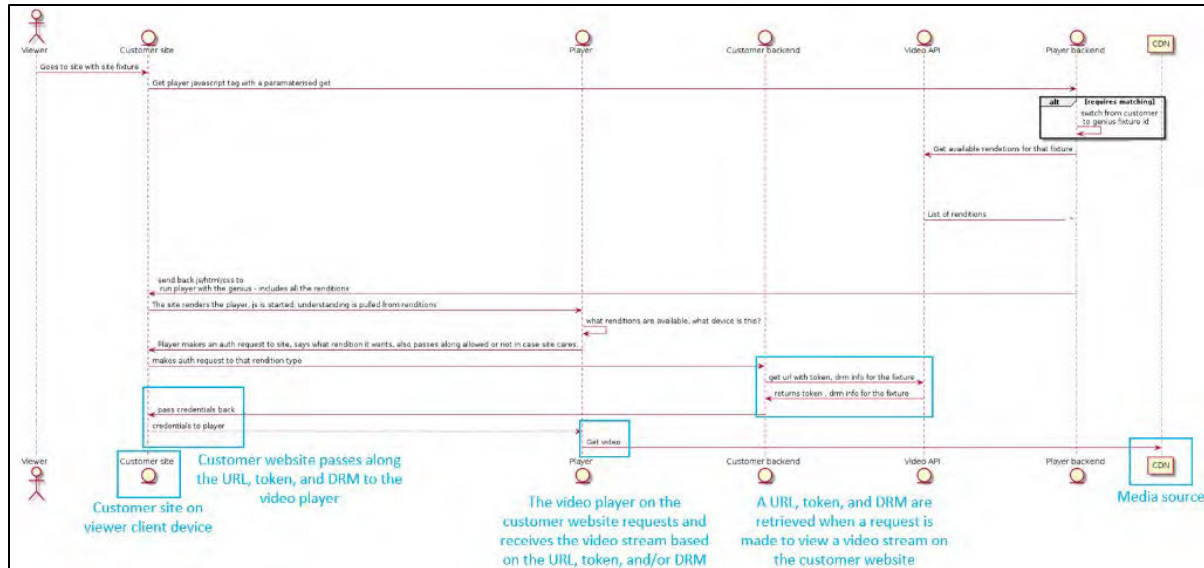
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You embed a script tag in your site with the querystring parameters you are interested in passing to the player. Our player looks at the stream types available for the specific fixture you are trying to display and picks the most appropriate stream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



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

Introduction

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

Connection

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

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

RAW

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

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

Example - HTTP

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

Example - RAW

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

(See, PANDA_000139-PANDA_000141,

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

168. 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.

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

Example - RAW

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

(See, PANDA_000139-PANDA_000141,

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

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

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

Fail-safe data and video capture

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

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

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

(See, PANDA_00231 at PANDA_000254,

<https://www.sec.gov/Archives/edgar/data/1834489/000119312521184911/d196130df1.htm.>)

170. 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.

171. 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.

172. 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.

173. 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.

174. 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.

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

176. 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.

177. 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.

178. 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.

179. 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.

180. 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.

181. 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 '218 Patent. None of these products are staple goods—they are sophisticated and customized video-streaming products, methods, and systems.

182. 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.

183. 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.

184. 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.

185. 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.

186. 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.

187. 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)

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

189. 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.

190. 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.

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

20. The system of claim 19, wherein:

in A), the plurality of media sources:

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

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

in C), the at least one socket server:

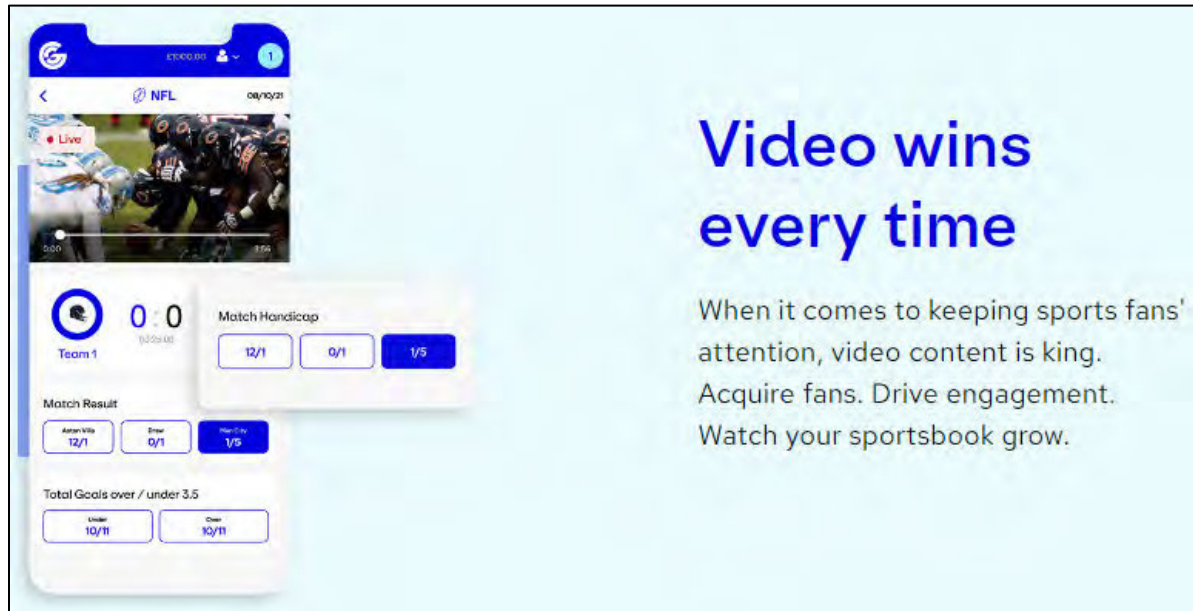
transmits at least the first score information of the first event information to the second viewer client device of the first plurality of viewer client devices via a third event information Internet communication channel between the at least one first event socket of the at least one socket server and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

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

192. 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 overlaid event information germane to the sporting

event.



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

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

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

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

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

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

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

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

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

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

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

194. 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 Tipspoint, a leading Czech sportsbook operator across retail and online.

Tipspoint 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.

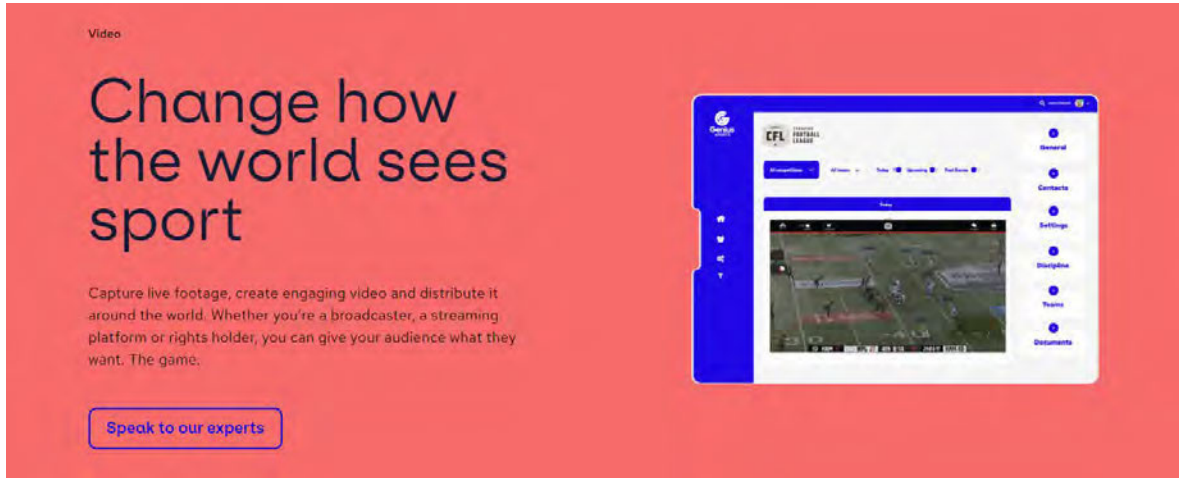
Powered by the highest quality data, Genius Sports will deliver real-time feeds and pin-point pricing for hundreds of competitions, including the EPL, NCAA Basketball, Euroleague Basketball and the NFL. Tipspoint will have access to Genius Sports’ full NFL product suite, including access to the league’s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

195. 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/>.)

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

We work with partners worldwide



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

We work with the biggest media players in sport



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

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

Give fans what they care about

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

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



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



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

BT Sport augments broadcasts with tracking data



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



Team Talk

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

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

The major UK broadcaster needed a solution that would be:

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

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

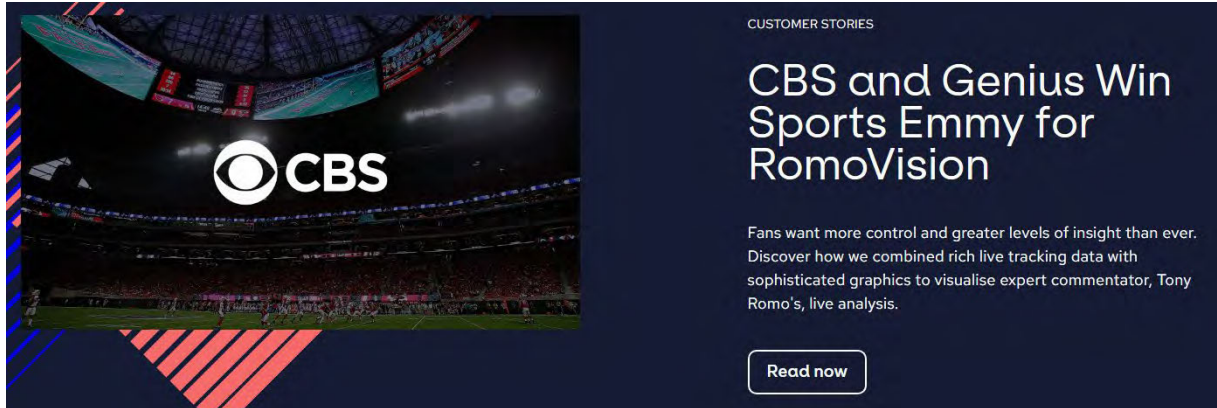


Bring sports stories to life

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

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

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



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

Get set up in 30 mins

If you're looking for the simple solution, then you need GeniusLive.

A single fixed camera, with full-HD streaming, which doesn't need a camera team and automatically adds the scoreboard to the screen.

You also get a handheld camera to grab that behind-the-scenes footage: team talks, coach reactions and post-game interviews.

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

GeniusLive in action:

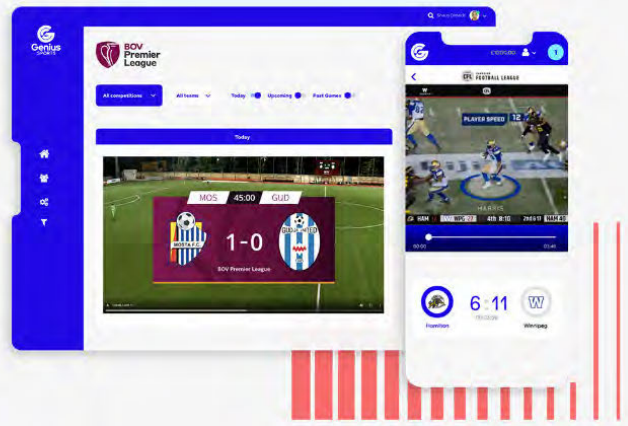
- 1 camera system, fixed in-venue
- Up to full HD video streaming
- Unmanned system films the entire court
- Installation within 30 minutes
- Graphic overlay (scoreboard)
- Additional handheld camera to take over video and audio
- Integrated with real-time fan engagement tools

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

Broadcast the full picture

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

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



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



GeniusLive+ in action:

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

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

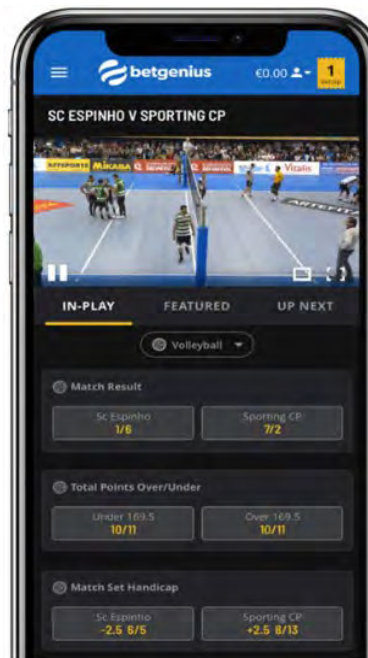
The NFL appointed Genius Sports in April 2021 as its exclusive worldwide distributor of real-time official play-by-play statistics, proprietary Next Gen Stats (NGS) data, and the League's official sports betting data feed to media companies and sportsbooks in regulated markets. This partnership included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

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

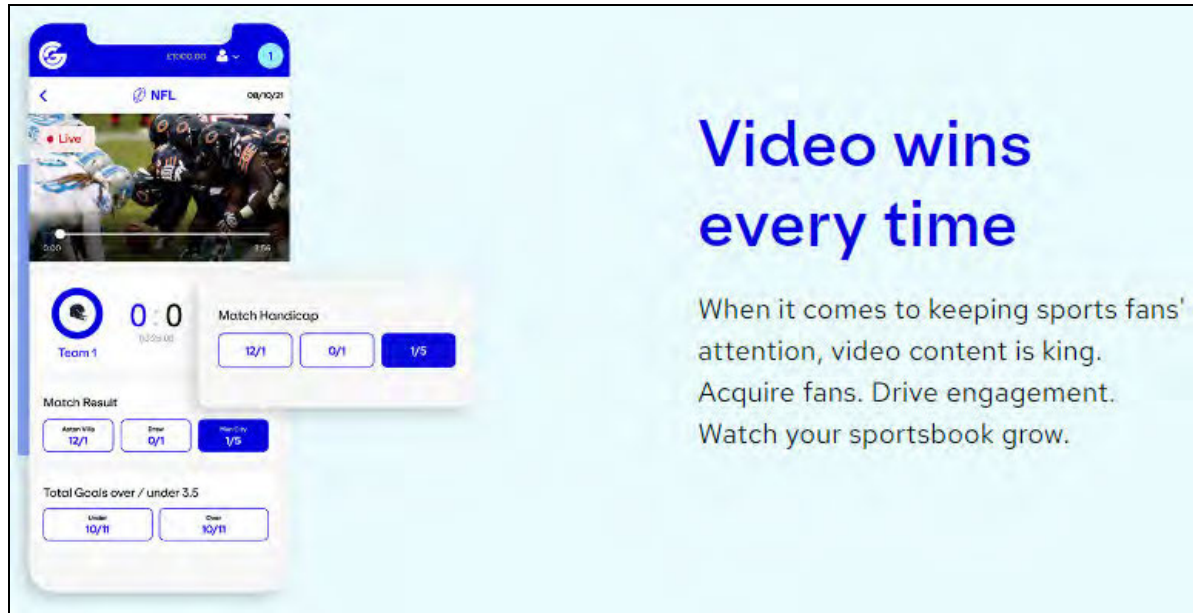
(See, PANDA_000066 at PANDA_000067, <https://www.geniussports.com/newsroom/genius-sports-expands-partnership-with-nfl-to-provide-watch-bet-video-streams-for-the-2022-season->

starting-with-caesars-entertainment/.)

198. 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>.)



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

199. 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.*

200. 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 court-side, 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>.)

201. 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.

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

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

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

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

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

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

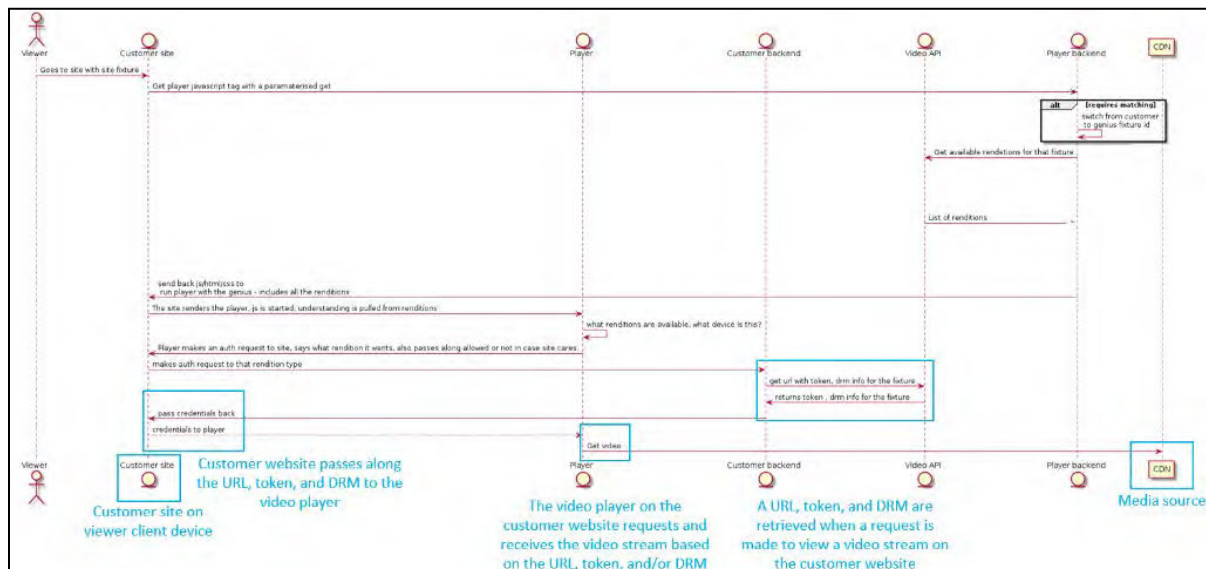
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

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

Our API should never be called from the browser directly.

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



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

203. 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.geniusports.com/Video-v3/PRODSTD`]
<https://explorer.api.geniusports.com/Video/v3/PRODSTD/swagger-latest.json>

Video Streaming API

The video streaming API is used by customers to:

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

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

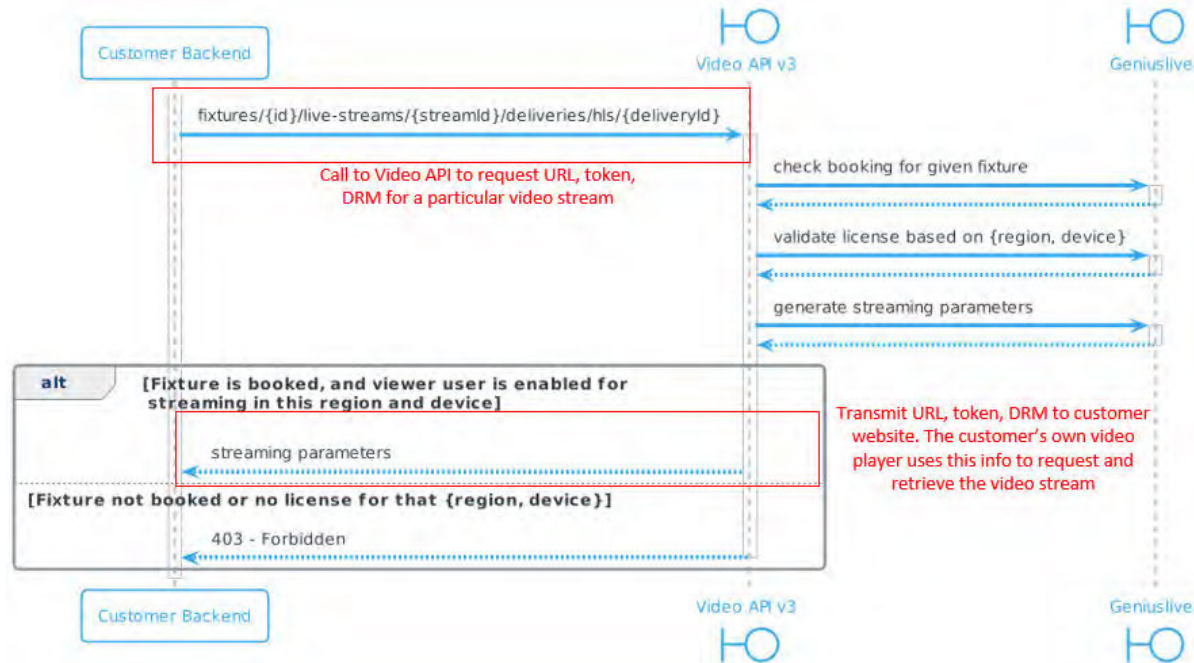
Player integration

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

Playing the content

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

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



(See, PANDA_00217, PANDA_00222,

<https://swaggerui.api.geniussports.com/?url=https://explorer.api.geniussports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json>.)

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

Schedule

This is where you select the booked fixtures for viewing.

For each fixture, you will see the following information:

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

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

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

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

(See, PANDA_000196 at PANDA_000198,

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

+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 - 75 mins
- Between 75- 90 mins
- First Half
- Second Half
- Since last Goal
- Since last Red Card
- Extra-time

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

205. 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/>.)

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

Introduction

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

Connection

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

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

RAW

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

/v2/{sport}/publish

Example - HTTP

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

Example - RAW

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

(See, PANDA_000139-PANDA_000141,

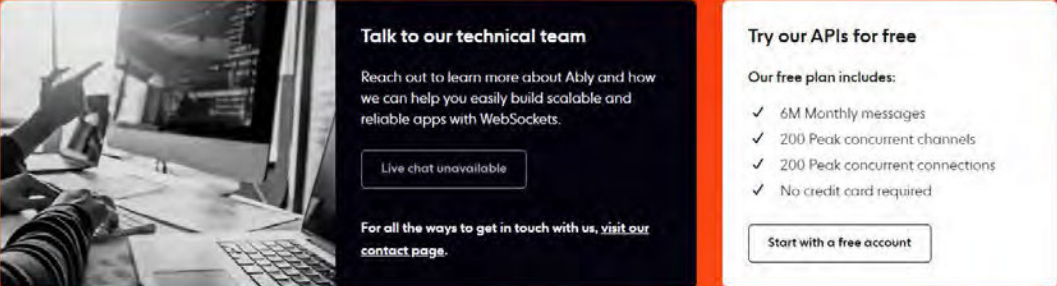
https://developer.geniussports.com/warehouse/livestream/publish/index_football.html.)

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

Infrastructure teams can “sleep easy” and developers are free to innovate

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

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



The screenshot shows a section of the Ably website with a dark background on the left and a white background on the right, all within an orange border. On the left, there is a photo of a person working at a desk with multiple monitors. To the right of the photo, the text reads: "Talk to our technical team", "Reach out to learn more about Ably and how we can help you easily build scalable and reliable apps with WebSockets.", a button that says "Live chat unavailable", and "For all the ways to get in touch with us, [visit our contact page.](#)". On the right side, the text reads: "Try our APIs for free", "Our free plan includes:", followed by a list of features: "✓ 6M Monthly messages", "✓ 200 Peak concurrent channels", "✓ 200 Peak concurrent connections", and "✓ No credit card required". At the bottom of this section is a button that says "Start with a free account".

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

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

More in-play profits

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

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

(See, PANDA_000111 at PANDA_000112-PANDA_000113,

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

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

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

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

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

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

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

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

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

Get set up in 30 mins

If you're looking for the simple solution, then you need GeniusLive.

A single fixed camera, with full-HD streaming, which doesn't need a camera team and automatically adds the scoreboard to the screen.

You also get a handheld camera to grab that behind-the-scenes footage: team talks, coach reactions and post-game interviews.



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



GeniusLive in action:

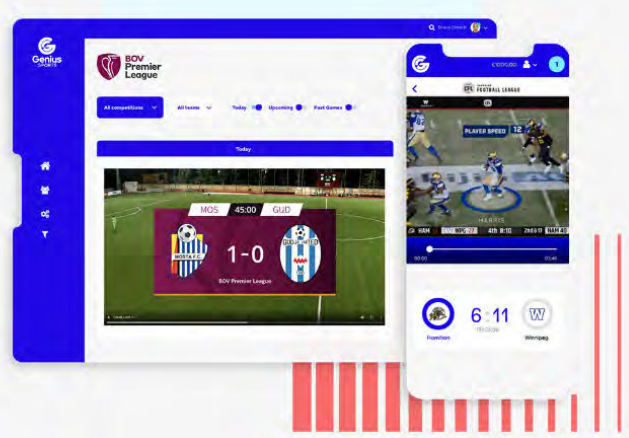
- 1 camera system, fixed in-venue
- Up to full HD video streaming
- Unmanned system films the entire court
- Installation within 30 minutes
- Graphic overlay (scoreboard)
- Additional handheld camera to take over video and audio
- Integrated with real-time fan engagement tools

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

Broadcast the full picture

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

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



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

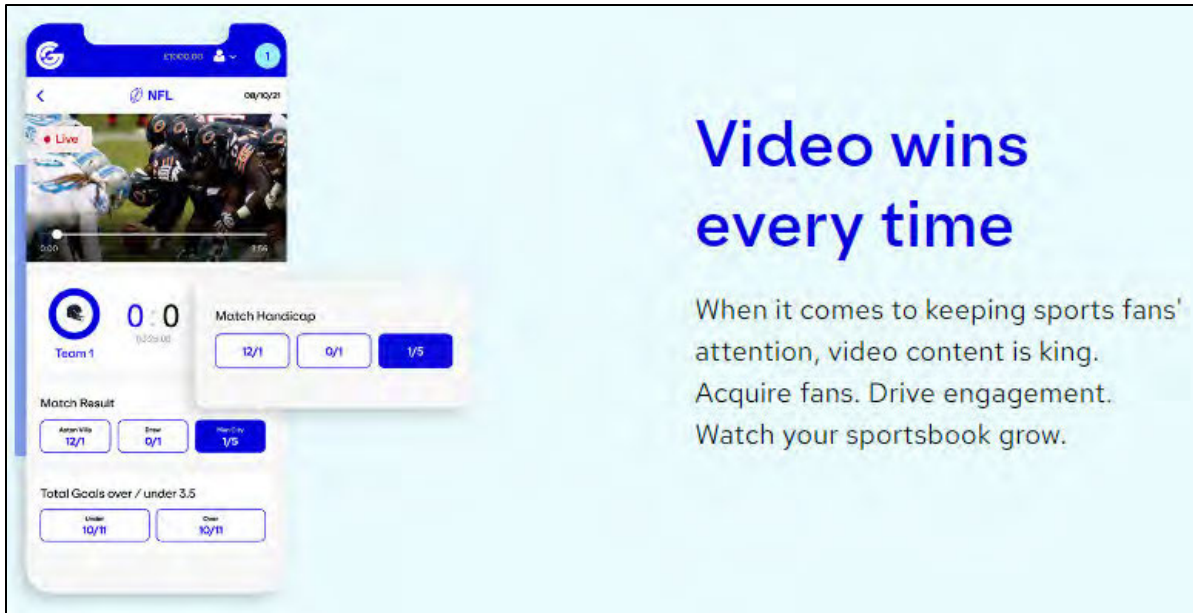


GeniusLive+ in action:

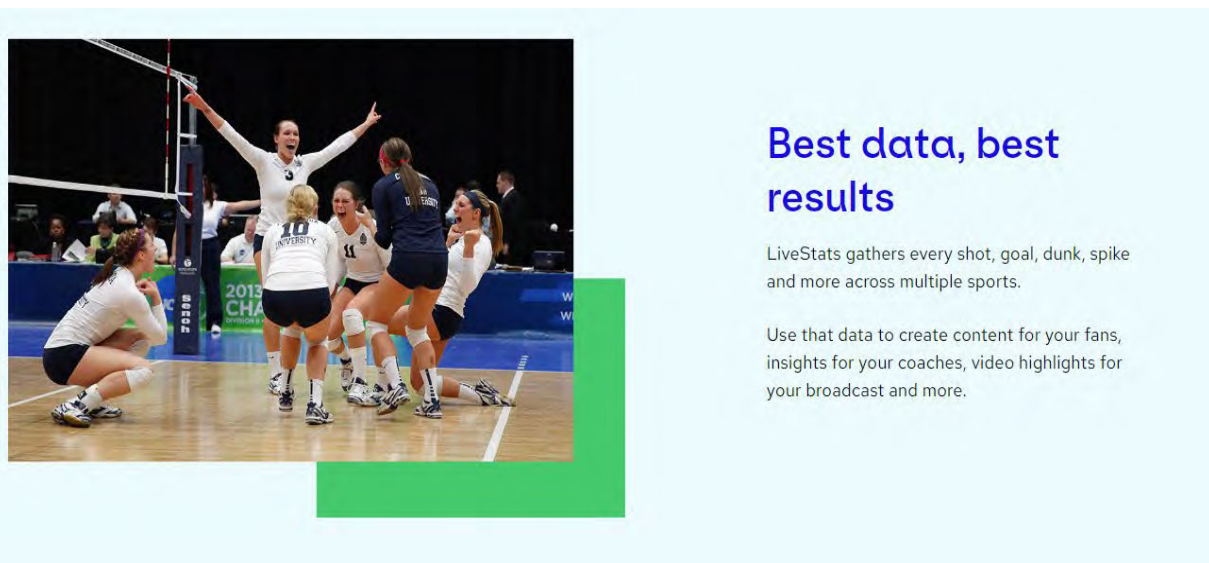
- Live and on-demand video in full HD
- Fully-automated production for every game and training session at the venue
- Full-pitch panoramic view through our unique camera head that captures 180° in high resolution
- Automated on-screen graphics and post-match highlights
- Enhanced production with additional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

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

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



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



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

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

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

In this document, you'll find a brief description of the new Multibet widget front-end structure. The multibet widget product is designed to allow bettors to place several bets related to a fixture in pre-match or in-play. Initially, American football and football (soccer) are supported, although the widget is intended to be sport agnostic, small tasks are required to support new sports.

It is intended for bookmakers to implement on their websites offering their users a range of configurable markets per event according to their needs. The Widget allows different customizations such as colors and fonts, which will allow our customers to use their brand properties offering their end users a seamless experience on their site.

(See, PANDA_000065,

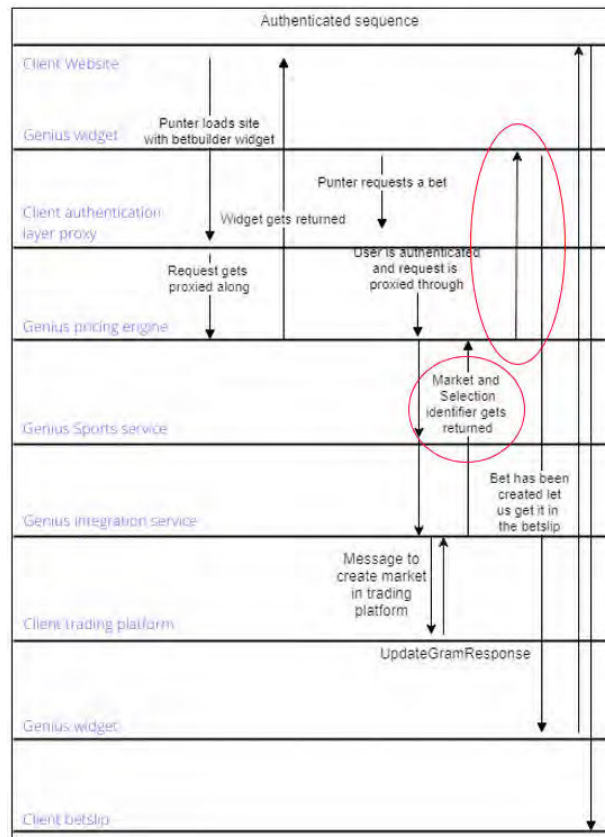
<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.>)

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.>)

211. 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.>)

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

Multibet Widget Integration

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

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

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

(See, PANDA_000065,

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

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

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

(See, PANDA_000077,

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

SmartStream Release Process

SmartStream is released to its 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/betstream
<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.

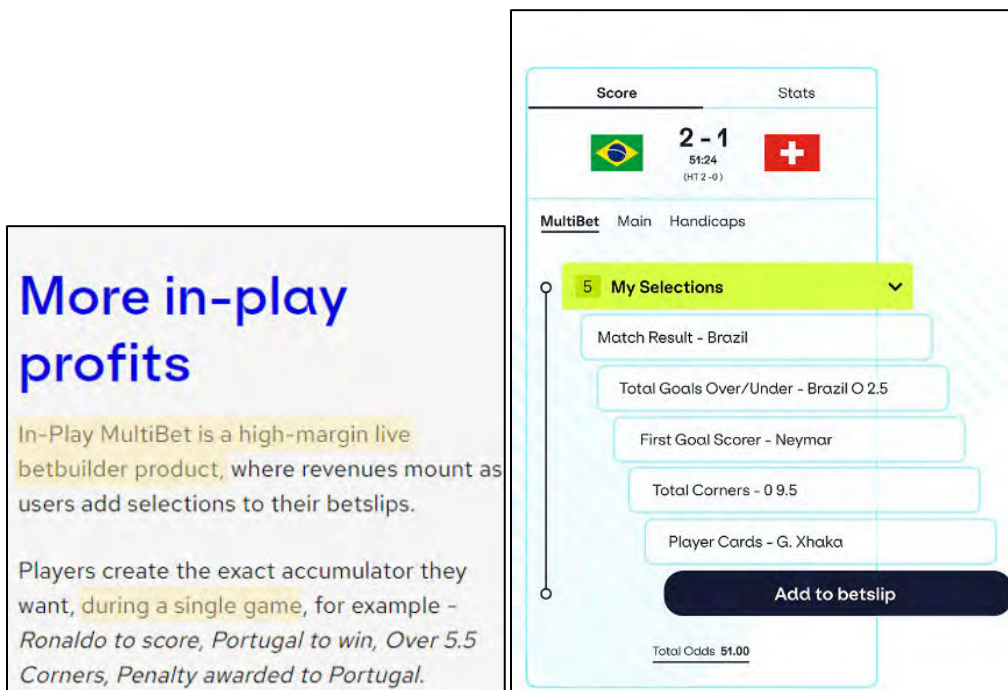
```

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

(See, PANDA_000077-PANDA_000078,

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

213. 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/.](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.

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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/>.)

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

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

215. 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>.)

216. 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.

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

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

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

```

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

```

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

```

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

```

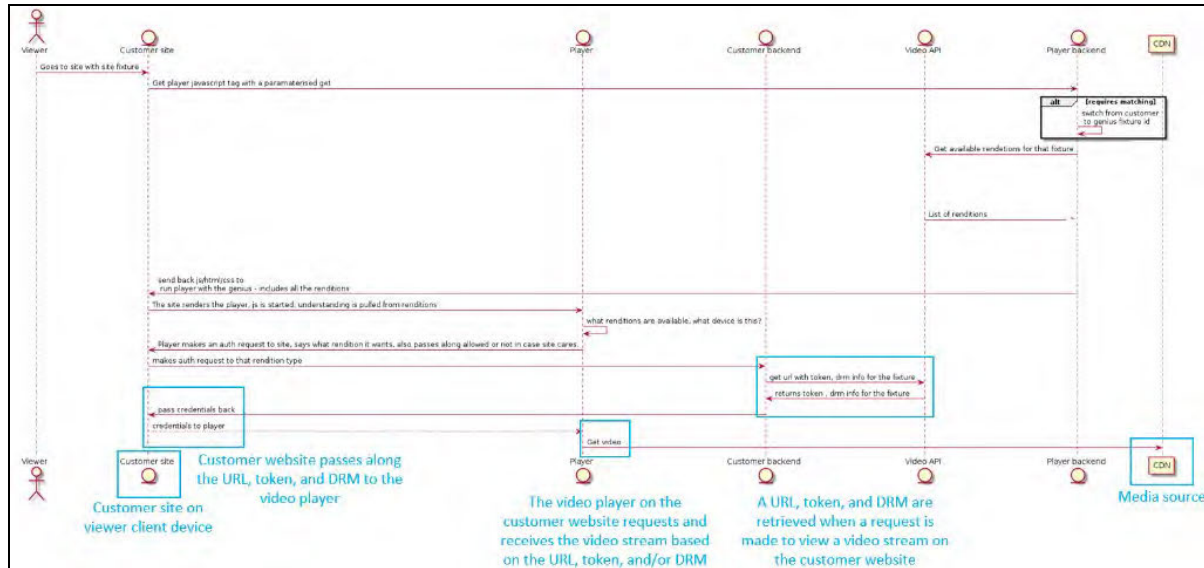
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

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

Our API should never be called from the browser directly.

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



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

218. 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.

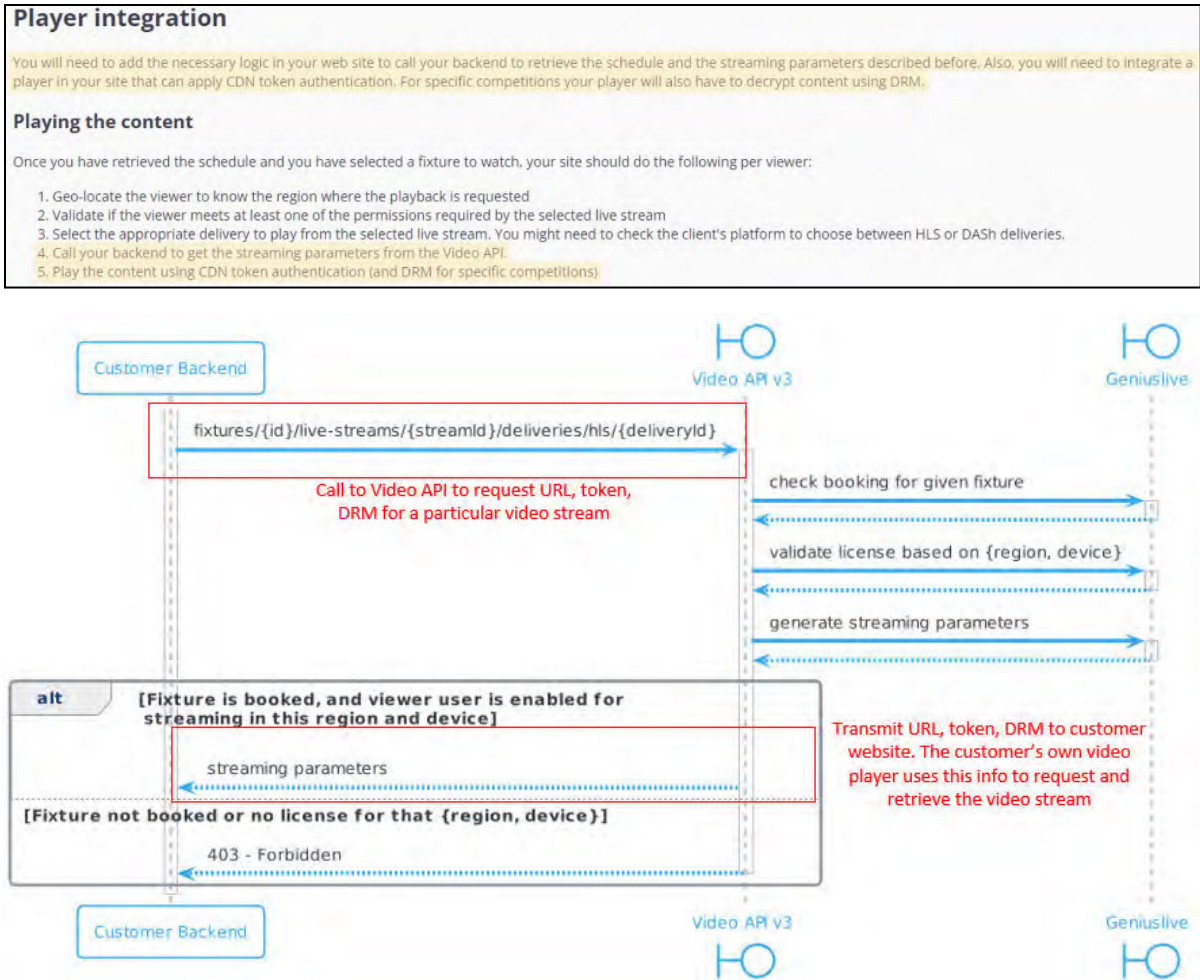
GL-Video-v3 3.0.38
[Base URL: ap1.geniusports.com/V1deo-v3/PRODSTD]
<https://explorer.api.geniusports.com/V1deo/v3/PRODSTD/swagger-latest.json>

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.



(See, PANDA_00217, PANDA_00222,

<https://swaggerui.api.geniusports.com/?url=https://explorer.api.geniusports.com/Video%2Fv3%2FPRODSTD%2Fswagger-latest.json>.)

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

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

220. 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,

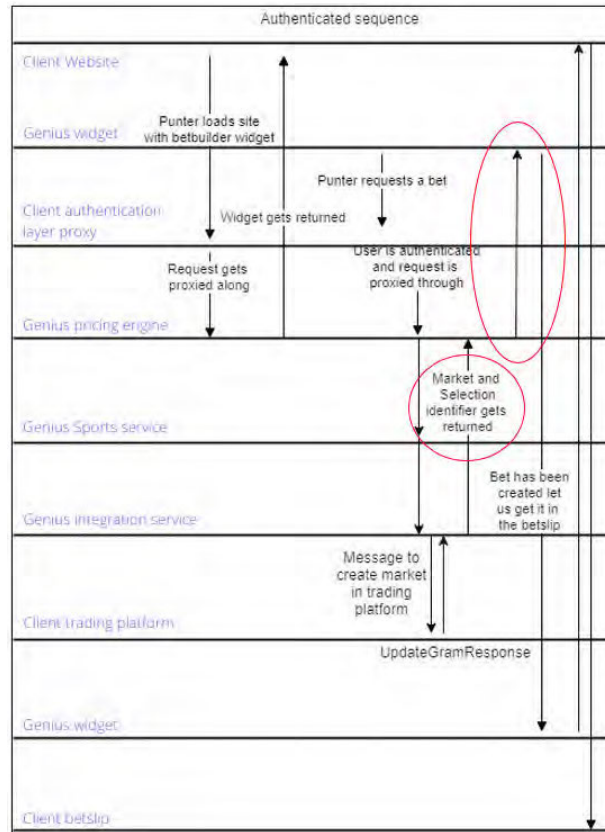
<https://geniussports.atlassian.net/wiki/spaces/BID/pages/4136337521/Multibet+Front-End+Integration.>)

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.



(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.

(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,

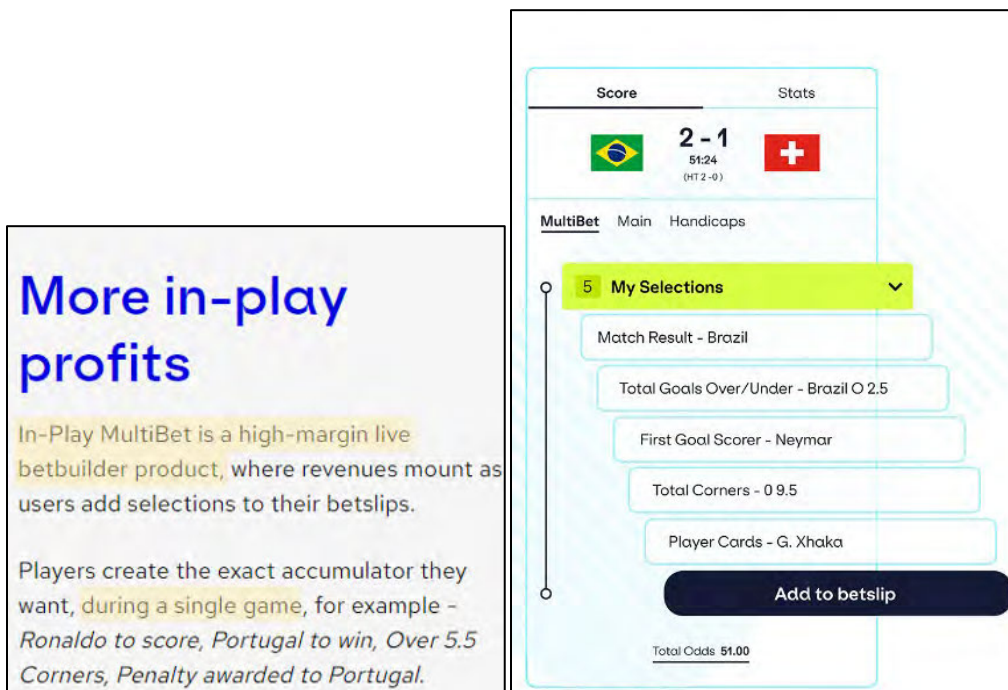
<https://geniussports.atlassian.net/wiki/spaces/BID/pages/56529015/SmartStream+Integrations.>)

<h4>SmartStream Release Process</h4> <p>SmartStream is released to its 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.</p> <p>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.</p> <p>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.</p>  <pre> graph LR Development[Development] -- Two weeks --> UAT[UAT] UAT -- Two weeks --> Production[Production] </pre>	<h4>Embedding a product</h4> <p>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.</p> <pre> <script src="https://bsdemo.betstream.betgenius.com/betstream <script> var iframeApi = new IFrameApi("betgenius-iframe"); </script> </pre> <p>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.</p> <pre> <iframe scrolling="no" id="betgenius-iframe" src="https://bsc </pre>
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(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.



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

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

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

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

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

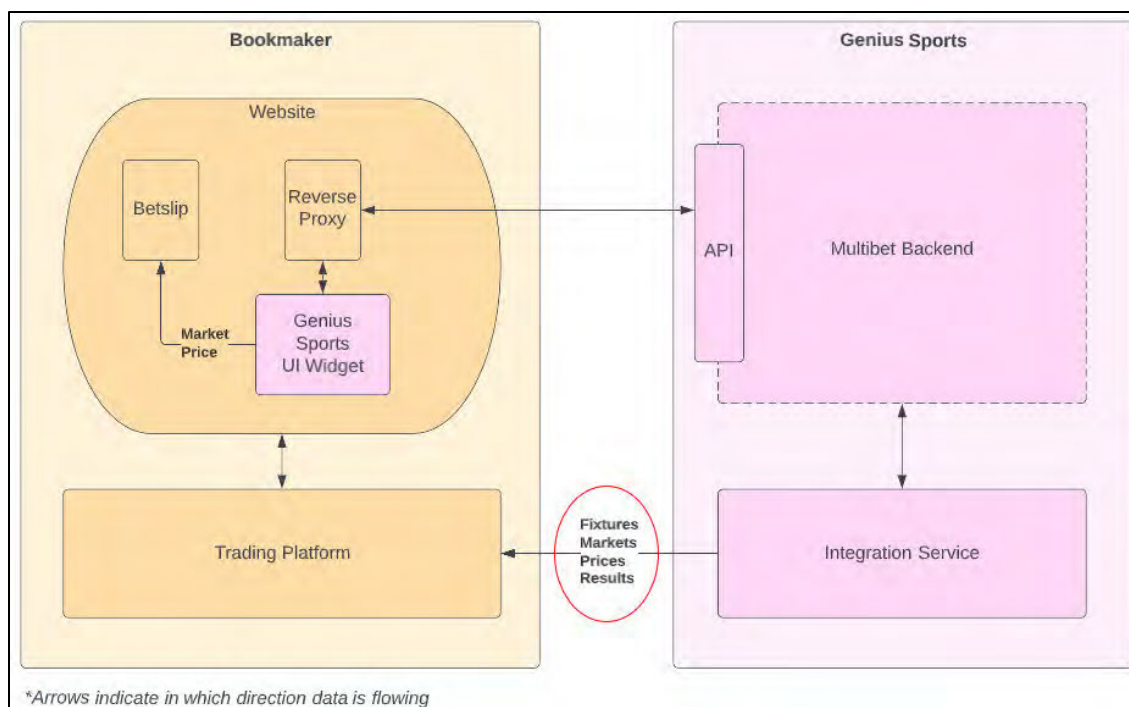
Launched in time to give sportsbooks a new dimension at the FIFA World Cup, *In-Play MultiBet* is powered by the highest quality AI-powered live odds, tried and tested on Genius Sports' leading LiveTrading service.

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

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

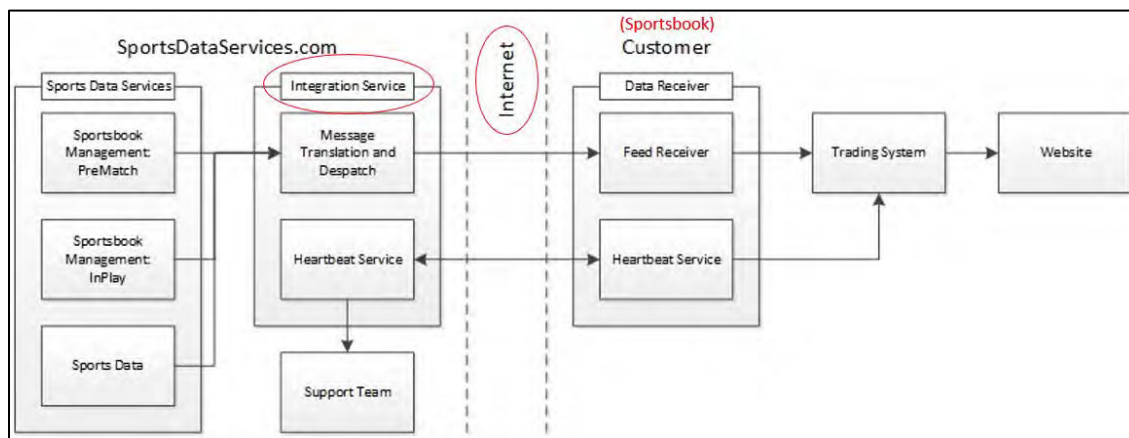
(See, PANDA_000179-PANDA_000180, <https://www.geniussports.com/newsroom/genius-sports-launches-in-play-multibet-for-the-next-generation-of-same-game-parlay-bets/>.)

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.



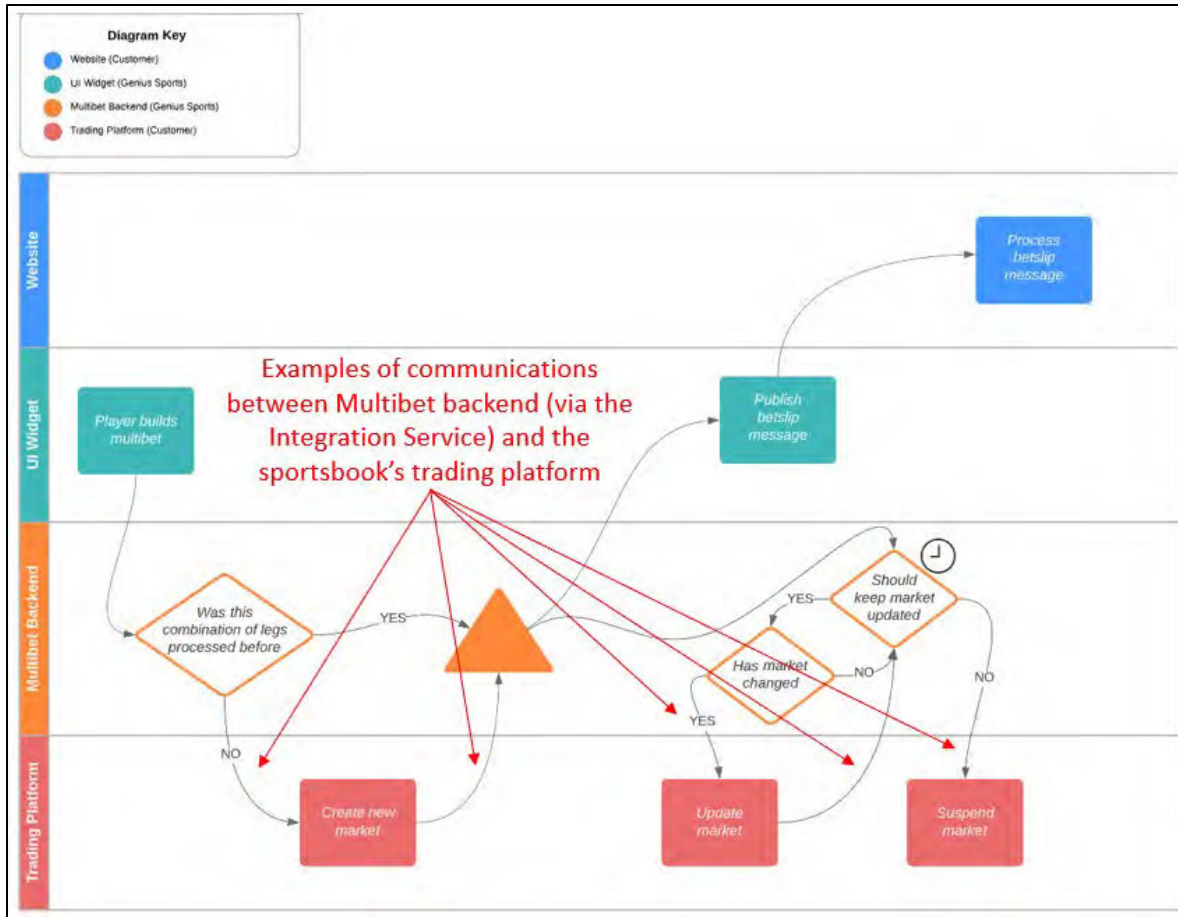
(See, PANDA_00212 at PANDA_00213,

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



(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.>)

225. 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.

226. 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.

227. 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.

228. 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.

229. 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.

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

231. 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.

232. 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' partner affirmatively aid and abet each customer's use of the Accused Products in a manner that infringes the '697 Patent.

233. 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.

234. 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.

235. 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.

236. 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.

237. 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.

238. 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.

239. 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.

240. 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.

241. 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.

242. 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)

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

244. 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.

245. For example, claim 1 of the '088 Patent recites:

1. A system, comprising:

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:

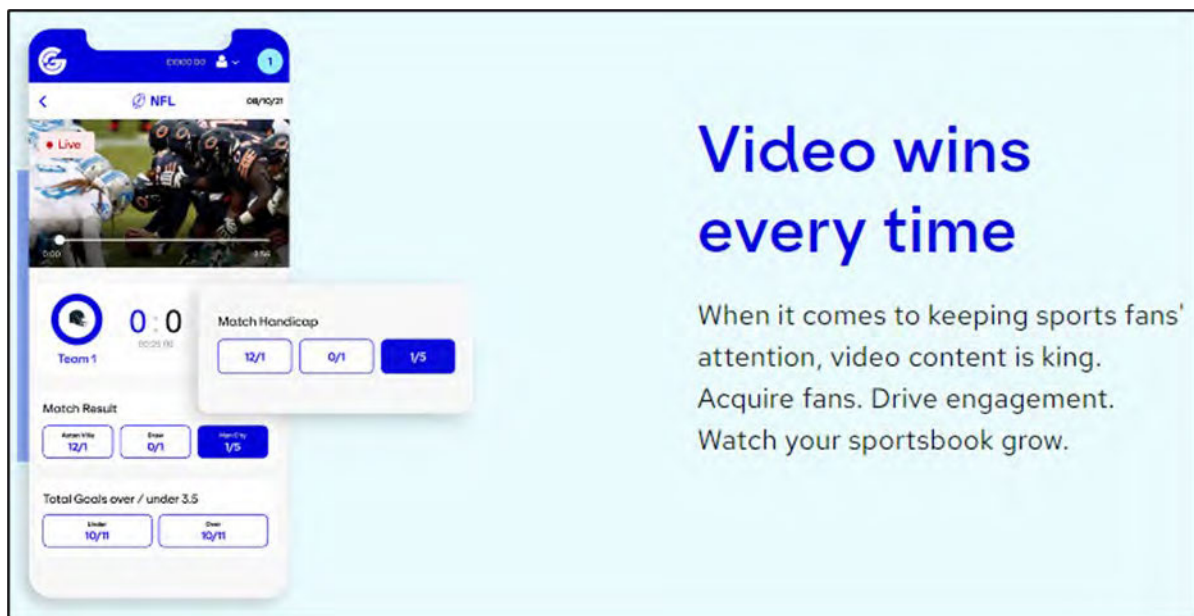
connect to the first socket of the socket server to receive, on a third communication channel between the first socket and the second client device, the first digital content corresponding to the first event information so that the first digital content received at the first client device and the second 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

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.

246. 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 overlaid event information germane to the sporting event.



(See PANDA_000055 at PANDA_000057)

247. 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 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.

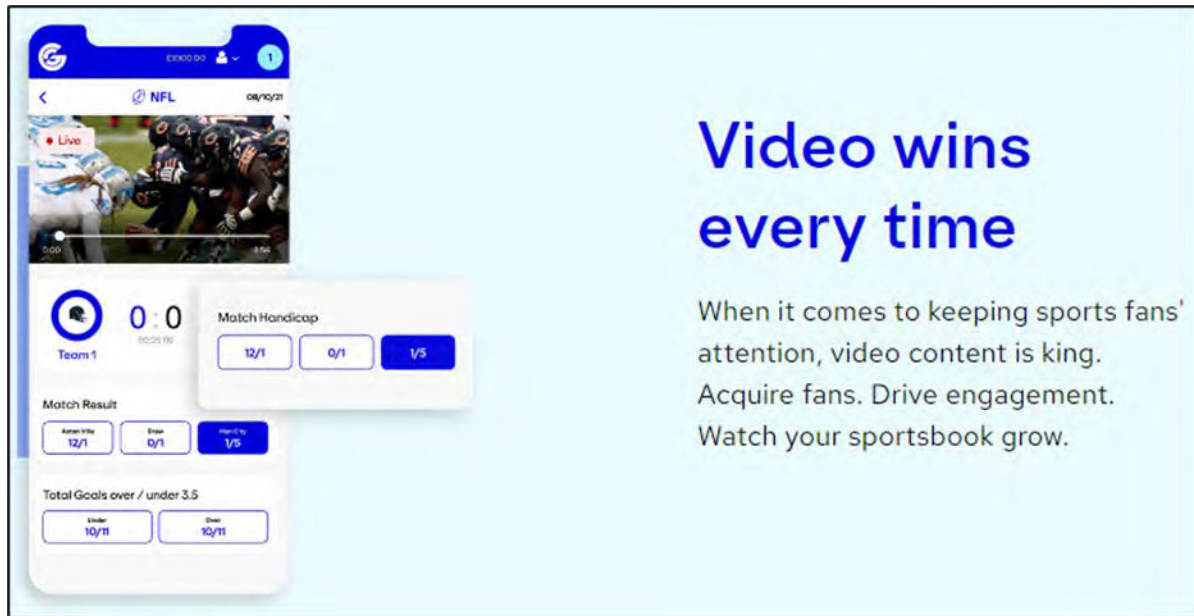
Tipsport has agreed to a substantial uplift in the number of annual events covered by Genius Sports’ suite of data-driven PreMatch, LiveData and LiveTrading solutions while maintaining full flexibility and control over each element of its sportsbook.

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/>.)

248. 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 overlaid event information germane to the sporting event.



(See PANDA_000055 at PANDA_000057)

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



- 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/>)

250. 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

authentication data.

251. 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:

```

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

```

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

```

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

```

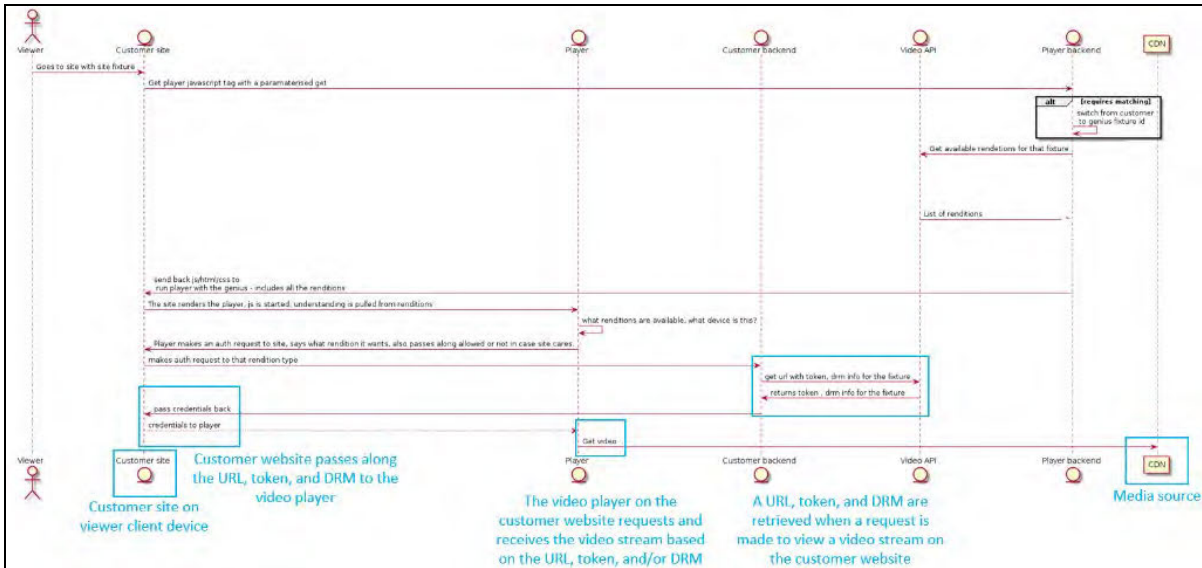
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

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

Our API should never be called from the browser directly.

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



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

252. 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 3.0.31

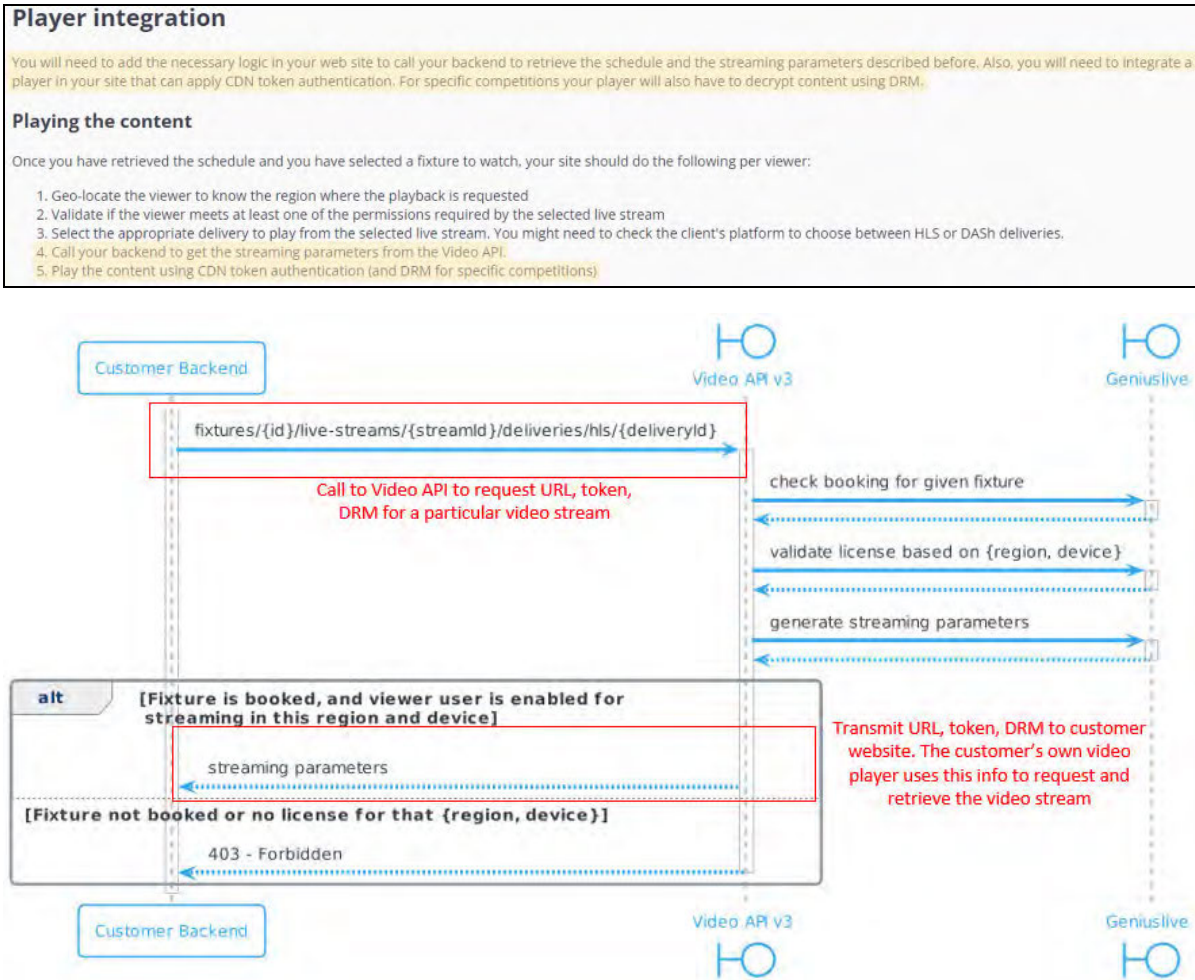
[Base URL: api.geniusports.com/Video/v3/PROQSTD/]
<https://explorer.api.geniusports.com/Video/v3/PROQSTD/swagger-latest.json>

Video Streaming API

The video streaming API is used by customers to:

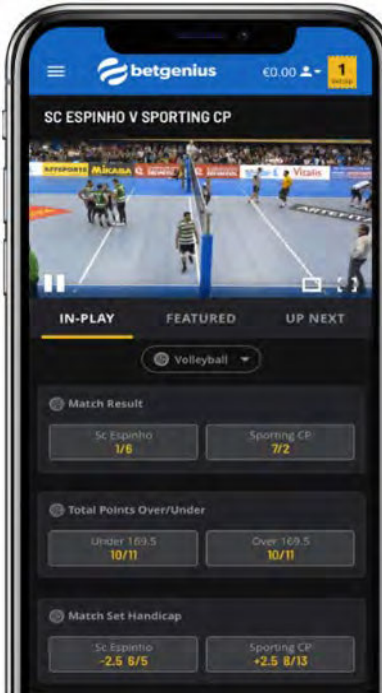
- Retrieve the schedule of upcoming streams.
- Retrieve the streaming parameters for a particular fixture.
- Retrieve the full list of possible regions for playback.

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.



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

253. 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.



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

254. 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>.)

255. 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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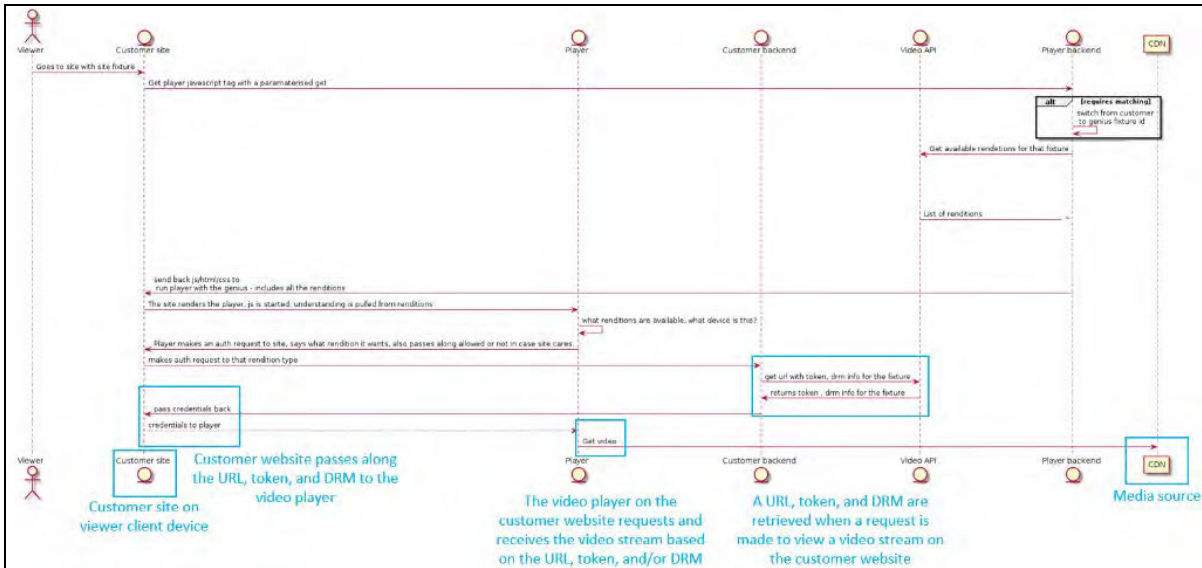
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GL-Video-v3 3.0.31

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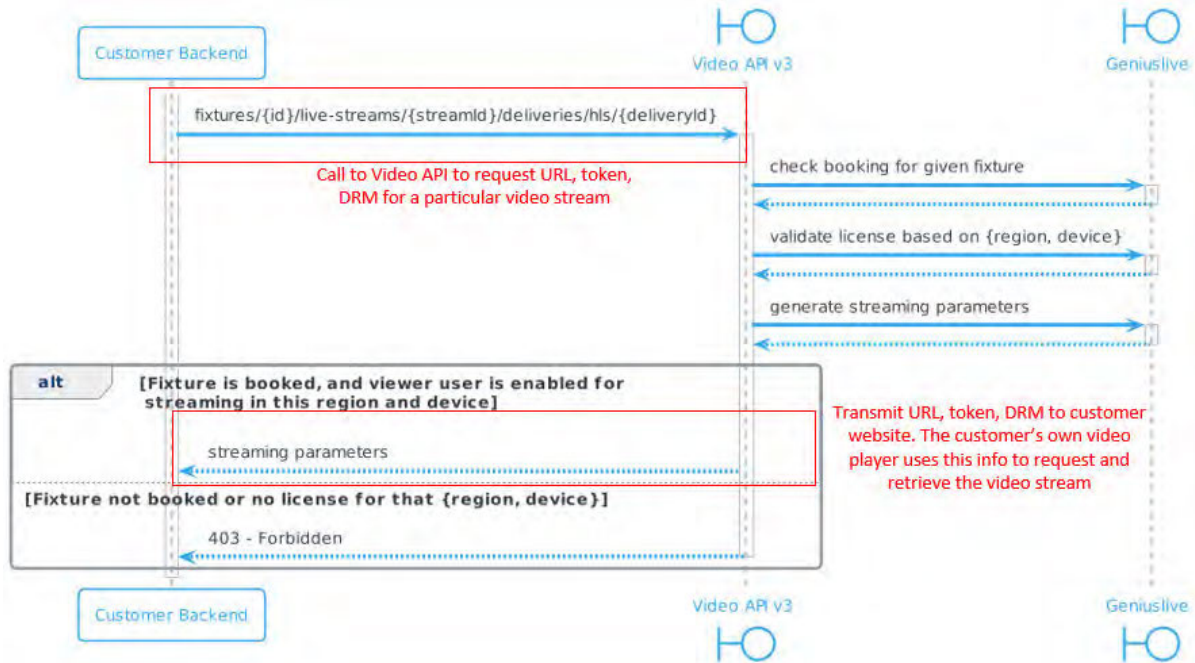
Player integration

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>.)

256. 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.

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(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 - 75 mins
- Between 75- 90 mins
- First Half
- Second Half
- Since last Goal
- Since last Red Card
- Extra-time

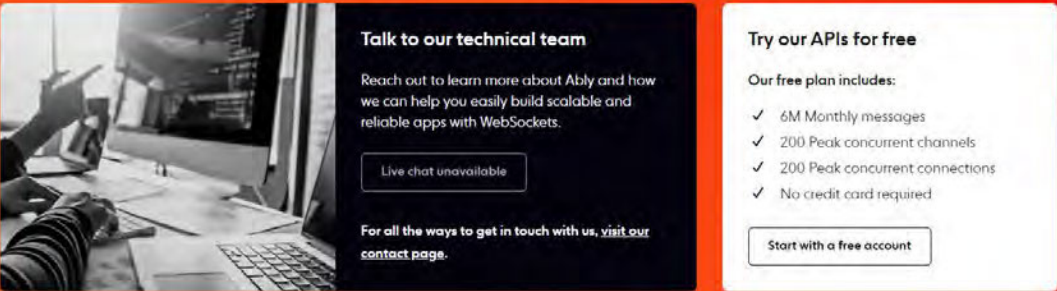
(See, PANDA_000196 at PANDA_000200-PANDA_000201, <https://geniussports.atlassian.net/wiki/spaces/BID/pages/1511621214/Live+Viewer+-+User+Manual>.)

257. 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.”

Infrastructure teams can “sleep easy” and developers are free to innovate

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

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



Talk to our technical team

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

Live chat unavailable

For all the ways to get in touch with us, visit our [contact page](#).

Try our APIs for free

Our free plan includes:

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

Start with a free account

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

258. 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>

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](#)

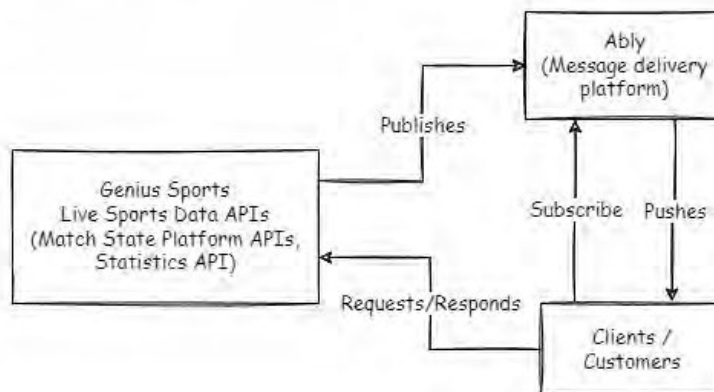
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Pull API for live sports data is exposed via collection of REST APIs called Match State Platform APIs and Statistics APIs. Their purpose is to provide endpoints for requesting information about current state of sports events by request/response model.

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



259. 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)

Introduction

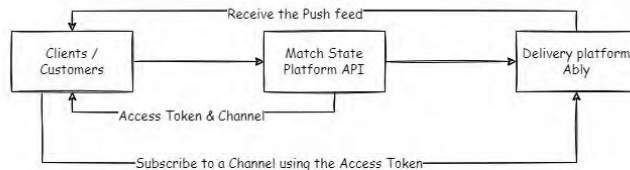
This document explains how to connect to Ably and receive "push feeds" where messages are sent by Genius Sports to clients as sporting actions occur. E.g. a message may describe a goal being scored or a sporting fixture starting.

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

Terminology

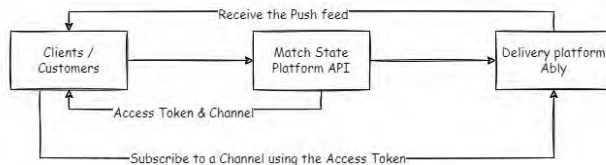
- **Ably Channel** - Channels are the medium through which messages are distributed. Clients attach to channels to subscribe to messages, and every message published to a unique channel is broadcast by Ably to all subscribers. This messaging pattern is commonly called the [Publish-subscribe pattern](#). 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](#).

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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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260. 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

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/>

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

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>

262. 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."

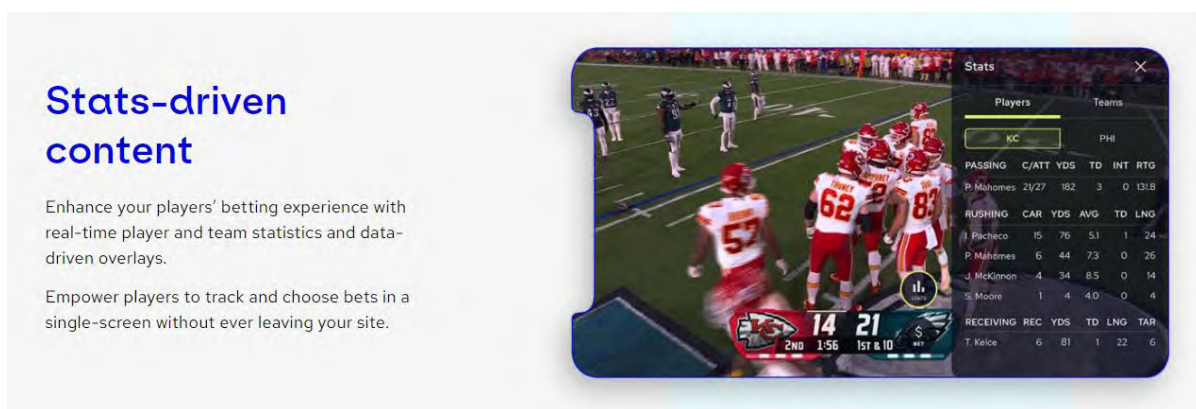
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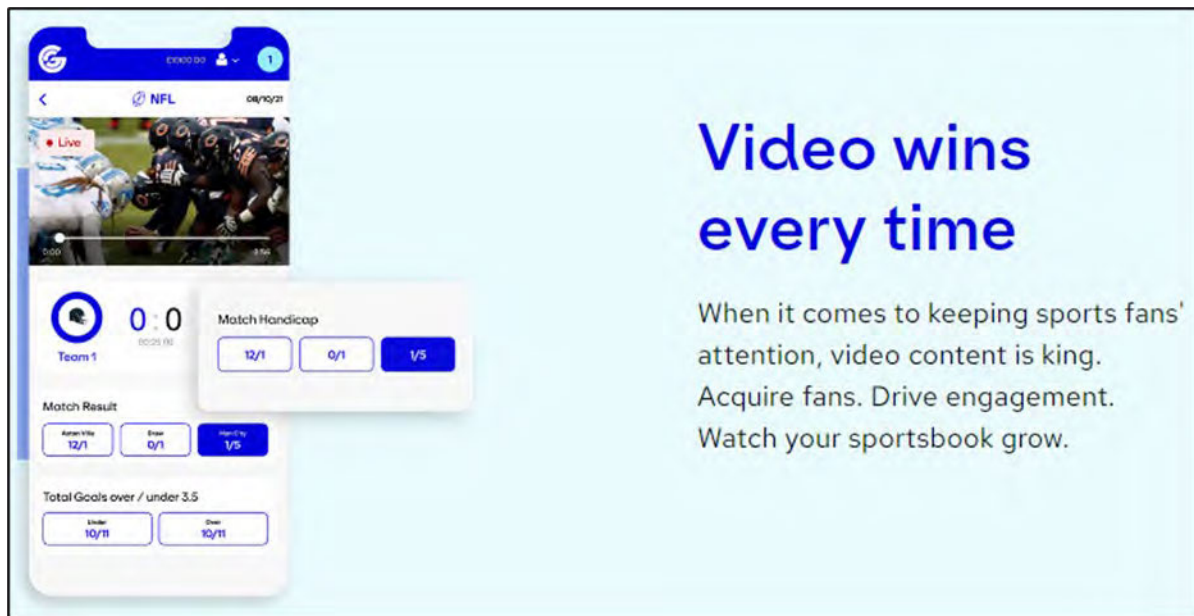
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263. In addition, Genius Sports’ BetVision can “[e]nhance [] players’ betting experience with real-time player and team statistics and data-driven overlays” and “[e]mpower players to track and choose bets in a single-screen without ever leaving your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



See, <https://geniussports.com/sportsbook/betvision/#bet-vision-video>

264. 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 overlaid event information germane to the sporting event.



(See PANDA_000055 at PANDA_000057)

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



- 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/>)

266. 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.

267. 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:

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

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

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

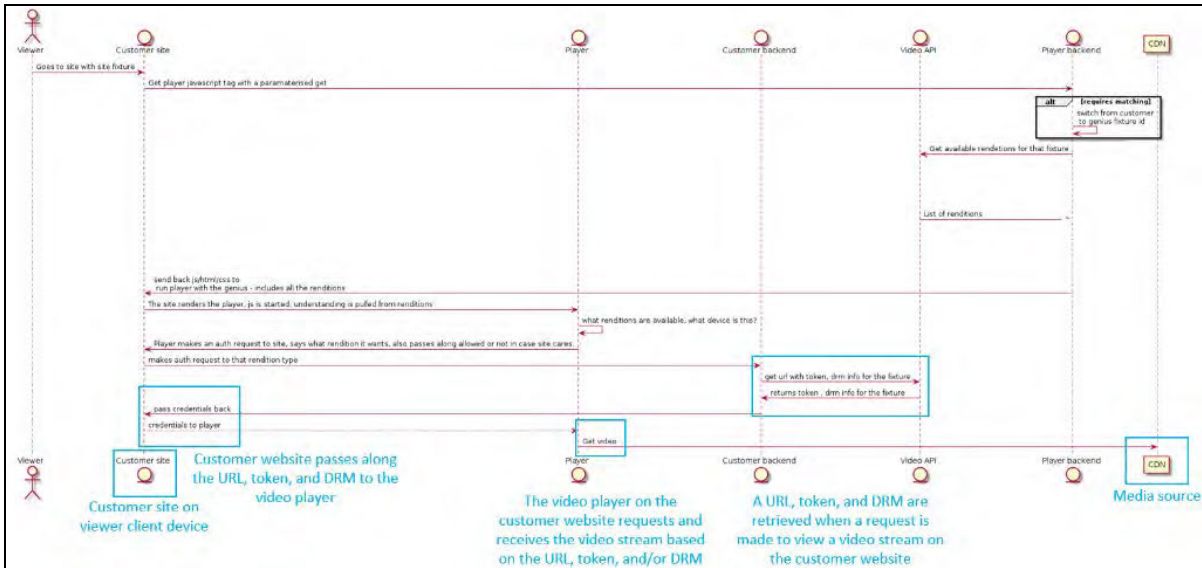
Add an event listener in your website to listen to the player ready event and when this triggers call our API to retrieve the stream-url and token and hand this response back to our player. Everything else is taken care of

How does it work?

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

Our API should never be called from the browser directly.

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



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

268. 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

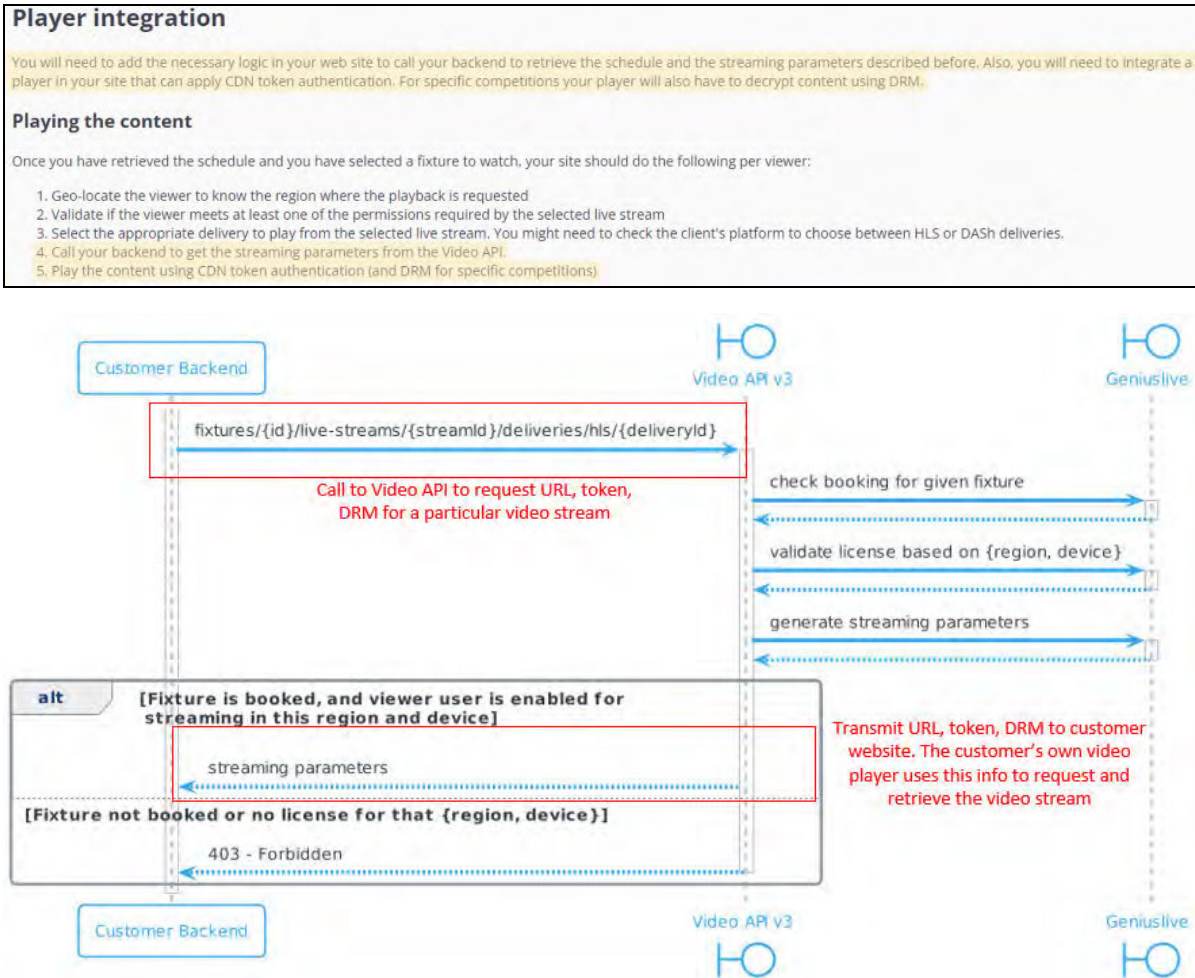
[Base URL: api.geniusports.com/Video/v3/PRODSTD]
<https://explorer.api.geniusports.com/Video/v3/PRODSTD/swagger-latest.json>

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.



(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 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 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.

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

270. 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](#)



See, <https://geniussports.com/sportsbook/betting-data-odds/livedata/>

Great sports data at your fingertips



Fully-automated

A single integration delivers 1000s of data points direct to your fingertips with 100% accuracy, with no manual resource required.



Zero-latency

We're the only authorised party for premium API data on 1000s of major sports fixtures, including metrics like fastest ball carriers and time to throw.



Single source of truth

Our API feeds are used as the NFL and NCAA's official league records – with every data point verified in real-time.

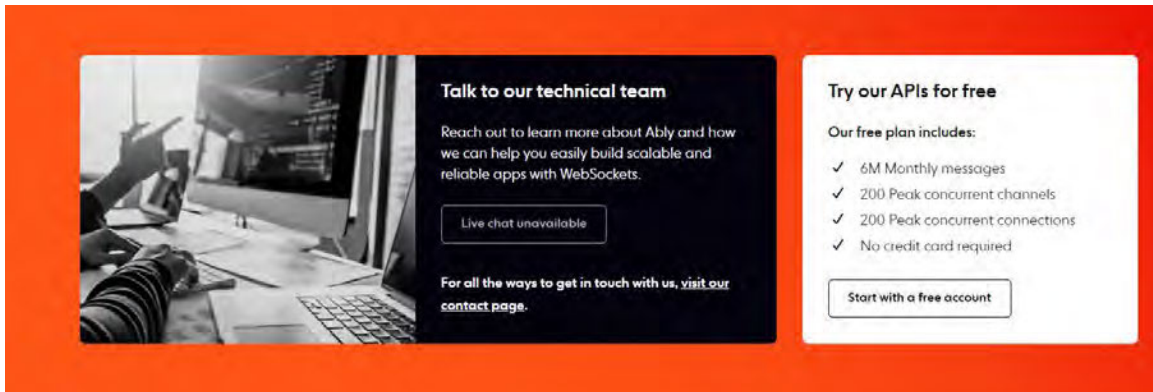
See <https://geniussports.com/genius-marketing-suite/genius-data-content/>

271. 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.”

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Owned by Martin Kuks ***
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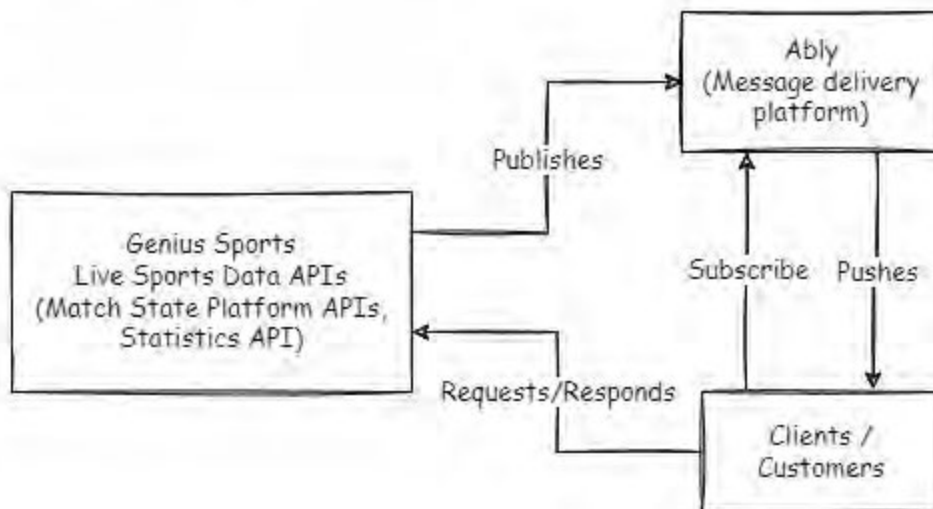
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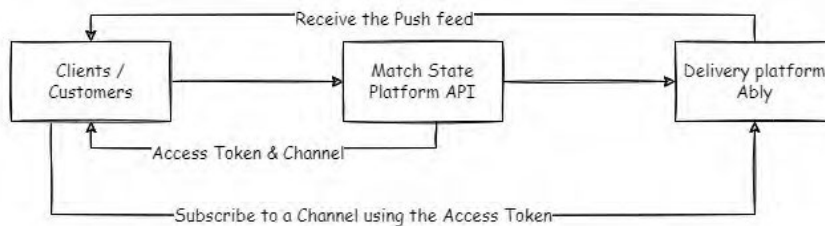
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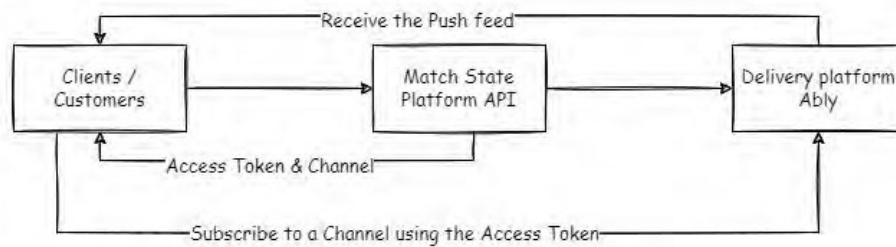
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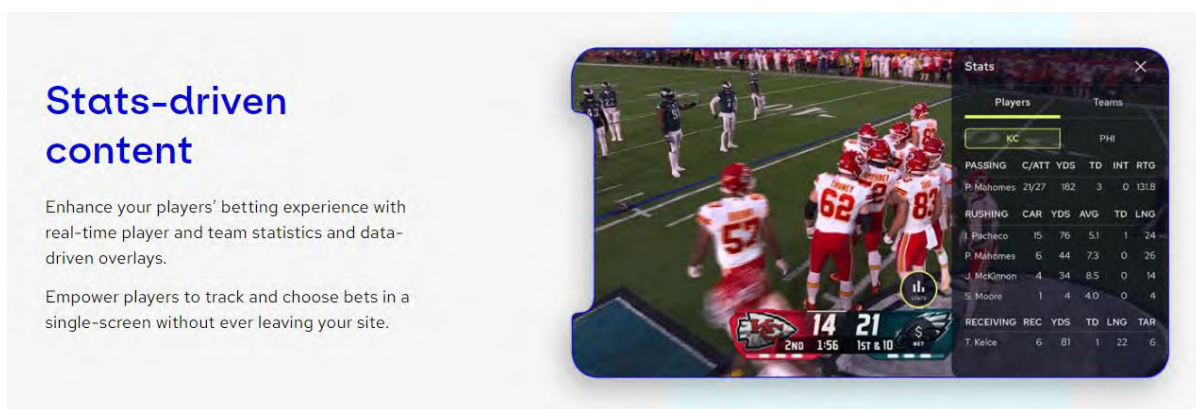
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See, <https://geniussports.com/sportsbook/betvision/#bet-vision-video>

278. 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.

279. 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.

280. 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.

281. 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.

282. 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.

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

284. 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.

285. 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.

286. 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.

287. 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.

288. 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.

289. 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.

290. 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 claim 1 of the '088 Patent.

291. 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.

292. 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.

293. 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.

294. 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.

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

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;

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

DEMAND FOR JURY TRIAL

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

Dated: September 25, 2024

Respectfully submitted:

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record as being served with a copy of the foregoing document via electronic email on September 25, 2024.

/s/ Matthew D. Wood
Matthew D. Wood