

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**SEARCH AND SHARE
TECHNOLOGIES, LLC,**

Plaintiff,

vs.

X CORP.,

Defendant.

Civil Action No. 1:25-CV-01540-RP

JURY TRIAL DEMAND

AMENDED COMPLAINT

Plaintiff Search and Share Technologies, LLC (“Plaintiff”) files this Amended Complaint against Defendant X Corp. (“Defendant” or “X”), and states as follows:

INTRODUCTION

1. This lawsuit seeks to stop X Corp.—one of the most powerful and influential technology platforms in the world—from exploiting patented innovations it neither created, owns, nor licensed. In 2011, inventors John Shriber and Roman Zaks developed breakthrough technology that revolutionized how users share information and how search results are generated from real user engagement. Their inventions, protected by U.S. Patent Nos. 10,180,952 and 11,106,744 (the “Patents-in-Suit”), enable users to interact with content through dedicated interfaces and ensure that those interactions directly shape what other users see in ranked feeds and search results.

2. X has built its flagship platform into a global communications hub by incorporating these very features. X allows its hundreds of millions of users to comment on, like, repost, and share content through interfaces separate from the main display window. Those interactions are

collected, indexed, and ranked by X's backend systems, and then surfaced in trending topics, feeds, and search results—exactly as disclosed in the Patents-in-Suit.

3. X has never sought or obtained a license to this technology. Instead, it has willfully appropriated these patented inventions and embedded them into its core platform, driving massive engagement and revenue while depriving Plaintiff of the exclusivity and value of its intellectual property.

4. Plaintiff Search and Share Technologies, LLC brings this action to hold X accountable for its ongoing infringement, to recover damages for past violations, and to secure injunctive and other relief necessary to prevent further unlawful use of its patented innovations.

PARTIES

5. Plaintiff is a limited liability company organized and existing under the laws of state of Florida, having a principal place of business at 529 West 41st Street, #280, Miami Beach, Florida 33140.

6. Defendant is a corporation organized under the laws of the state of Nevada with its headquarters at 865 FM 1209, Building 2, Bastrop, Texas 78602. Defendant may be served with process through its registered agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

JURISDICTION AND VENUE

7. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C § 1338.

8. This Court has personal jurisdiction over Defendant because X has committed acts of infringement in this District and has continuous and systematic contacts with this forum. X directly and through subsidiaries or intermediaries has made, used, offered for sale, sold, and

imported infringing products and services within this District. Exercising jurisdiction over X in this action comports with due process and traditional notions of fair play and substantial justice.

9. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). X maintains its principal executive offices and headquarters at 865 FM 1209, Building 2, Bastrop, Texas 78602, which lies within the Western District of Texas. From this location, X directs its nationwide operations, develops and deploys the accused products and services, and employs numerous individuals across engineering, product development, legal, operations, and other functions. Accordingly, X has a regular and established place of business in this District and has committed acts of infringement here.

10. Plaintiff will also call relevant X employees who reside and work in this District to testify at trial.

FACTUAL ALLEGATIONS

A. Inventor Background

11. Long before social media giants dominated the internet, inventors Shriber and Zaks were building the tools that made modern online sharing and discovery possible. In the mid-1990s, Shriber launched Apartment Source, one of the first platforms to list apartments online. That venture grew into “Move On In,” a multi-platform network that raised over \$60 million and included early innovations in roommate matching, coworking space listings, and online dating.

12. In 2003, Shriber partnered with Zaks to create Roomster, a global roommate-matching platform that flourishes to this day. Always ahead of the curve, the two inventors set out to solve problems that were novel to the early stages of the internet economy—making online content easier to flip through, easier to share, and easier to find based on what real people actually cared about.

13. They created the now-ubiquitous “next” interface for browsing listings like flipping pages in a magazine. They invented a one-click “share” button that let users send content without copying long, messy links. And they re-engineered search itself—developing technology that ranks results based on real user engagement, not just static web crawls. This breakthrough became the foundation for the Patents-in-Suit, which cover systems that let a first user interact with content through a separate interface and have those interactions directly influence what a second user sees in search results.

B. The Patents-in-Suit

14. Plaintiff Search and Share Technologies, LLC is the sole assignee of all rights, title, and interest in the '952 Patent and the '744 Patent. The Patents-in-Suit, entitled “*Search Engine*”, were invented by Shriber and Zaks.

15. The '952 Patent is a continuation of and claims priority to U.S. Patent Application No. 13/420,503, filed March 14, 2012, which claims the benefit of U.S. Provisional Application Ser. No. 61/452,595, filed March 14, 2011.

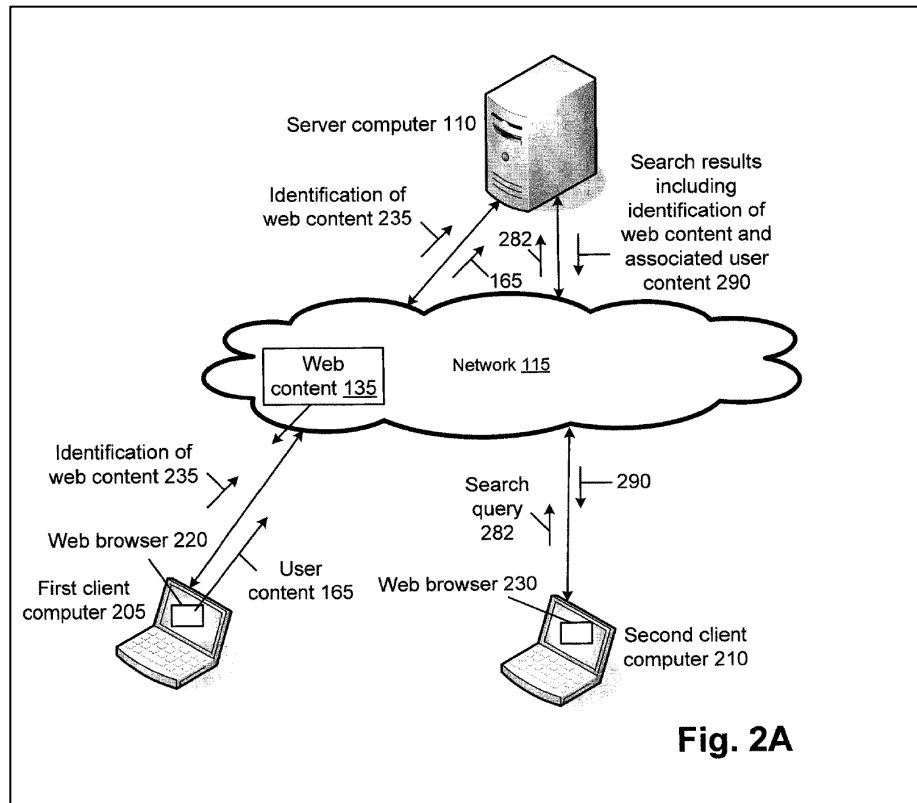
16. The '744 Patent is a continuation of U.S. Patent Application No. 15/142,479, filed on April 29, 2016, which is a continuation of and claims priority to U.S. Patent Application No. 13/420,503, filed on March 14, 2012, which issued on May 10, 2016 as U.S. Pat. No. 9,338,215, which claims the benefit of U.S. Provisional Application Ser. No. 61/452,595, filed March 14, 2011.

17. The Patents-in-Suit address a long-standing flaw in traditional search engines. Conventional systems crawled static links, indexed the located content, and relied on opaque algorithms to rank results—often failing to capture what real users actually found relevant. As explained in both patents, such methods do “not accurately reflect the interest of users on the web.”

'952 Patent at col. 1, 30–32; '744 Patent at col. 1, 33–35. The Patents-in-Suit resolve this issue by creating a search engine that reflects the interest of users on the web.

18. The Patents-in-Suit address deficiencies in conventional search engines that fail to reflect actual user interest in web content. Both patents disclose systems that operate alongside existing web browsers. A user views third-party web content in a browser window, while a separate user interface—distinct from the main browser window—allows the user to identify that web content, submit ratings or other interactions, and control how portions of the content are displayed. The system indexes and ranks content based on these user interactions, and later incorporates that ranked content into search results delivered to other users.

19. The patented methods allow a first user to interact with content through a user interface separate from the main browser or application window—by commenting, liking, rating, or sharing—and then transmit that interaction to a server. The server indexes and ranks the content based on those interactions. When a second user submits a search query, the server selects and transmits results that directly incorporate the indexed and ranked content from the first user's engagement.



20. The '952 Patent discloses, among other things, a method where the system automatically selects and displays a portion of third-party content to a first user in a separate interface based on settings received from that user via the interface, and uses it to index and rank the content for later search queries by other users.

21. The '744 Patent discloses a method where a first user identifies displayed content through a separate interface, the system indexes it, and a second user's search retrieves results that include the identified content in a position relative to other user-identified content.

22. These inventions are now standard features in modern platforms—including X—but remain protected intellectual property. X has never licensed the Patents-in-Suit, yet its core functionality, as described herein, practices the claimed methods in direct violation of Plaintiff's exclusive rights.

C. X's Infringing Activities

23. X is one of the world's most influential social media and communications companies, with hundreds of millions of active users worldwide on its flagship platform. X generates billions of dollars in revenue by enabling users to create, share, and discover digital content enriched with multimedia, reposting, replies, hashtags, and other interactive features.

24. Central to the success of X—and central to this case—are features that implement the patented methods claimed in the '952 and '744 Patents. X allows a first user to engage with content through interfaces that are separate from the main window of a web browser, transmits those interactions to X's servers, and then indexes, ranks, and surfaces that content in trending topics, search results, and personalized feeds for other users.

25. X's mobile applications do not operate solely as standalone native viewers. When users click on links to third-party websites, X's mobile applications invoke embedded web browser components, including WebView-based browsers on iOS and Android platforms. These embedded browsers render third-party web pages using standard web technologies (HTML, CSS, JavaScript) in a main web browser window within the application. The embedded WebView renders third-party web pages in a main browser window within the mobile application, distinct from the separate interaction interface.

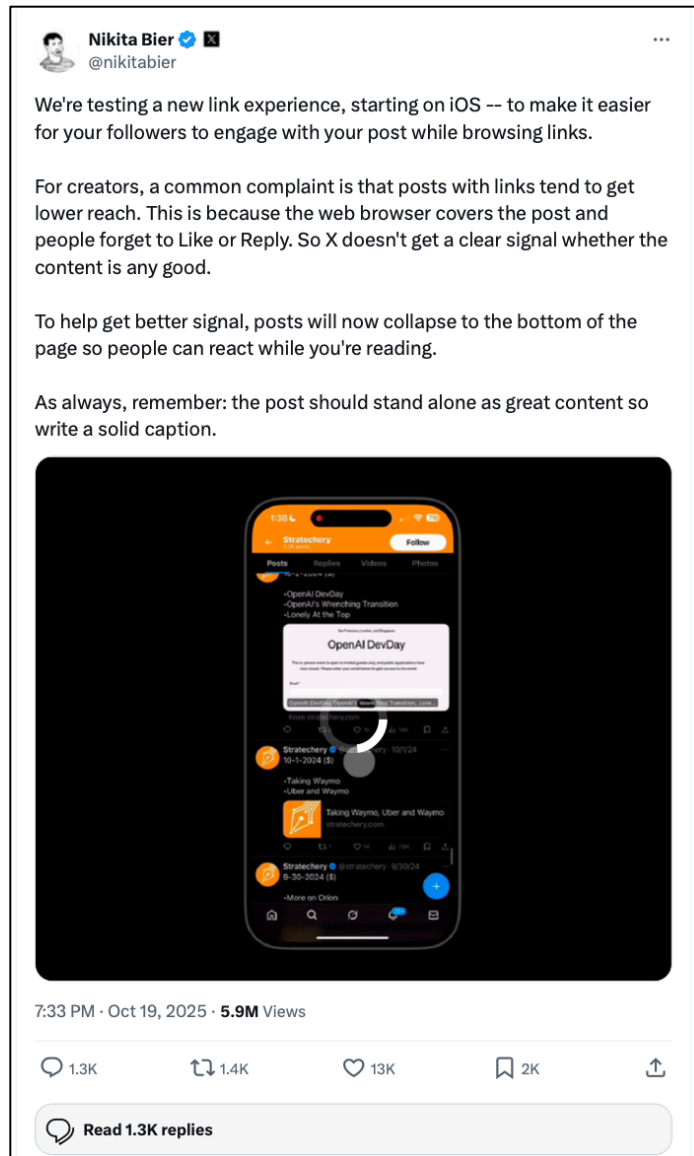
26. While third-party web content is displayed in the embedded web browser, X simultaneously presents separate interaction interfaces from the main browser window. These interfaces include reply panels, repost and share dialogs, reaction and engagement controls, and related overlays. The separate interfaces persist while the web browser displays the third-party content and are used by the user to interact with that content.

27. Through these separate interfaces, X enables a first user to identify the web content displayed by the embedded web browser, including by transmitting the URL, metadata, preview

object, or other identifiers associated with the displayed web page to X's servers. These transmissions occur via the separate interaction interface rather than through the main window of the web browser itself.

28. X's mobile application thus operates in conjunction with a web browser to enable users to interact with third-party content via separate user interfaces.

29. A recent post by X's Head of Product (Nikita Bier) shows exactly how this works in practice. In the post, Bier explains interactions between the main web browser window and the separate user interface (*e.g.*, where users may Like or Reply to posts).



30. These public statements expressly recognize the existence of two distinct components operating simultaneously within X's mobile application: (i) a main window of a web browser rendering third-party web content, and (ii) a separate interaction interface through which users submit likes, replies, and other engagement.

(1) X's Mobile App Infringes the '952 Patent

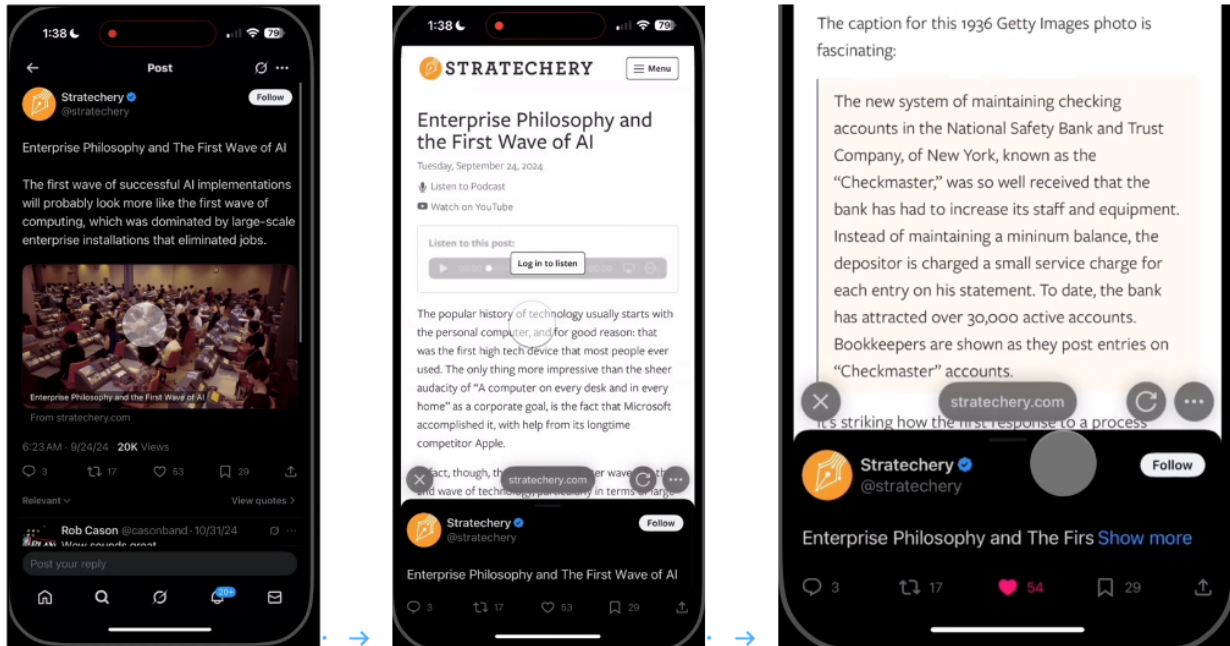
31. X's Mobile infringes the '952 Patent through at least the following features.

i. Separate Interaction Interface

32. X's platform provides overlay interfaces (i.e., comment, like, and share panels) that operate independently from the main window of a web browser. In the below screenshot, a separate user interface is provided for interacting with third-party content in the X mobile application:



33. Similarly, the three screenshots below—taken from a video posted by X's Head of Product—show an X post with a link to third-party content, as well as a separate user interface; that interface then persists after the link is clicked through and accessed via the embedded web browse:



34. According to the X employee, the user interface was collapsed to the bottom while browsing “to make it easier for your followers to engage with your post while browsing links.”

35. As both these examples show, the identified web content includes content hosted on third-party domains distinct from X, including news and media websites, which is rendered by the embedded web browser and identified via the separate interaction interface.

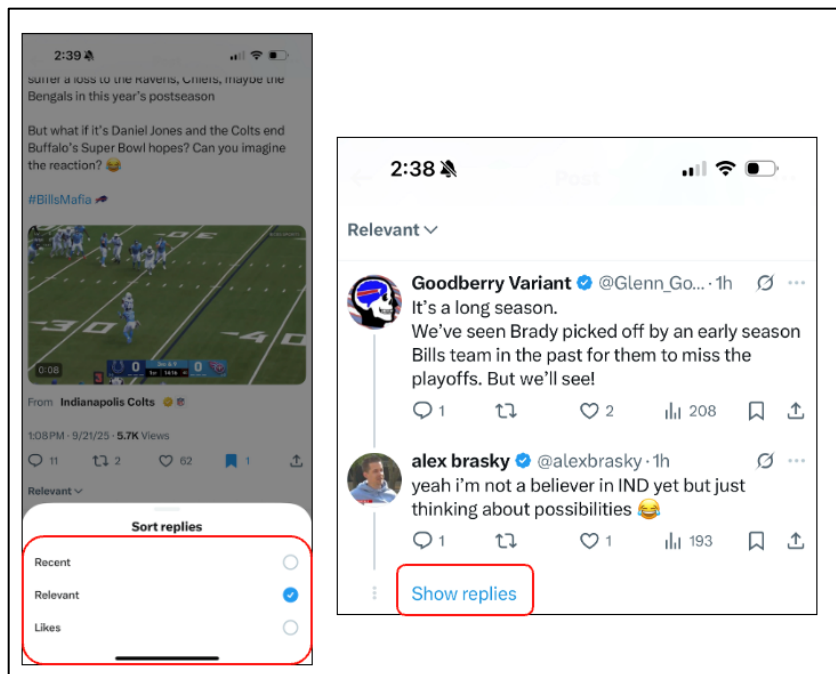
ii. Automatic Content Selection Based on User Settings

36. These overlays display an automatically selected portion of third-party content, such as truncated comments, captions, or preview segments, consistent with the '952 Patent's disclosure.

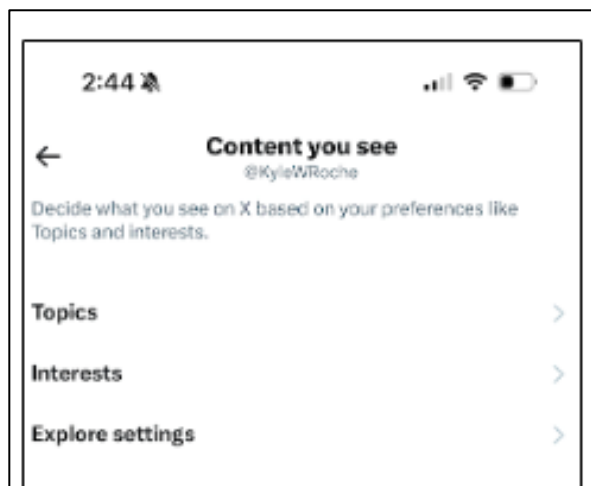
37. X's separate interaction interfaces also receive and apply settings from users that control how portions of third-party content are selected and displayed. Through the separate interfaces, users configure preferences and settings that govern, among other things: whether content previews are expanded or truncated; which comments or replies are shown first; the ordering and filtering of responses; whether sensitive or restricted content is displayed; how much

of an article preview, caption, or media excerpt is presented. Based on these user-defined settings, X's system automatically selects which portion of the third-party content is displayed in the separate interface without further user action.

38. For example, X allows the user to sort and expand comments based on actions taken by the user within the overlay interface, as shown in the below:

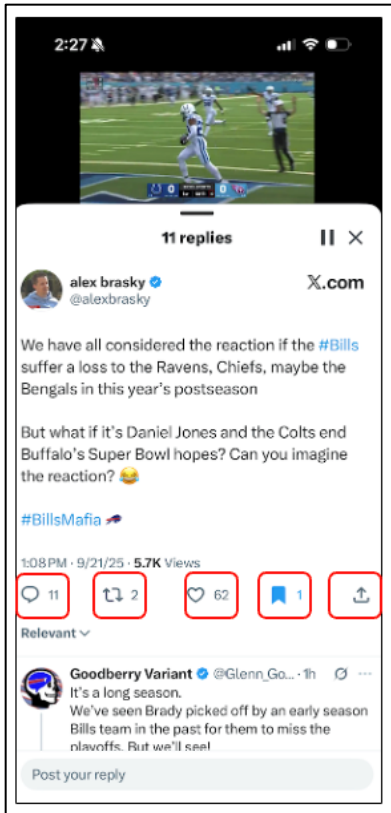


39. As an additional example, X allows the user to set certain content preferences that constrain the type of third-party content selected and shown within the first user interface:



iii. User Submissions Transmitted to Server

40. X's platform receives first-user interactions—including likes, comments, shares, and reactions—through these separate interfaces, as shown in the below:



iv. Indexing and Ranking by Engagement

41. X's backend systems index and rank content based on those user interactions, directly mirroring the inventions' purpose of reflecting real user interest.

42. Upon receipt of the identification of third-party web content and associated user interactions through the separate interaction interface, X's backend systems store the identified web content in one or more searchable indices. These indices persistently associate the identified web content—including its URL, metadata, and engagement data—with corresponding user submissions, ratings, and interactions, rather than merely displaying the content transiently in an ephemeral feed. When users later submit search queries through X's search functionality, X's

servers query these searchable indices to retrieve, rank, and return results that include the previously indexed web content in positions determined relative to other indexed content based on accumulated user engagement.

43. Below is X's own description of, among other things, how it "estimates what you would find relevant by analyzing the engagements of people you follow or those with similar interests":

Social Graph

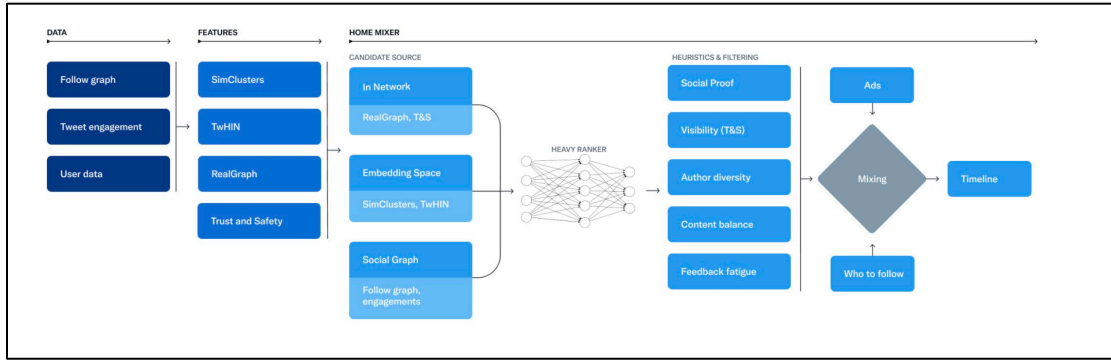
Our first approach is to estimate what you would find relevant by analyzing the engagements of people you follow or those with similar interests.

We traverse the graph of engagements and follows to answer the following questions:

- *What Tweets did the people I follow recently engage with?*
- *Who likes similar Tweets to me, and what else have they recently liked?*

We generate candidate Tweets based on the answers to these questions and rank the resulting Tweets using a logistic regression model. Graph traversals of this type are essential to our Out-of-Network recommendations; we developed [GraphJet](#), a graph processing engine that maintains a real-time interaction graph between users and Tweets, to execute these traversals. While such heuristics for searching the Twitter engagement and follow network have proven useful (these currently serve about 15% of Home Timeline Tweets), embedding space approaches have become the larger source of Out-of-Network Tweets.

44. And in the below flow chart, X lays out the "major components used to construct a [X user] timeline." It shows all the data X uses to construct timelines (*i.e.* to choose what to show its users) is generated via user interactions submitted via a separate interface and/or via user settings:



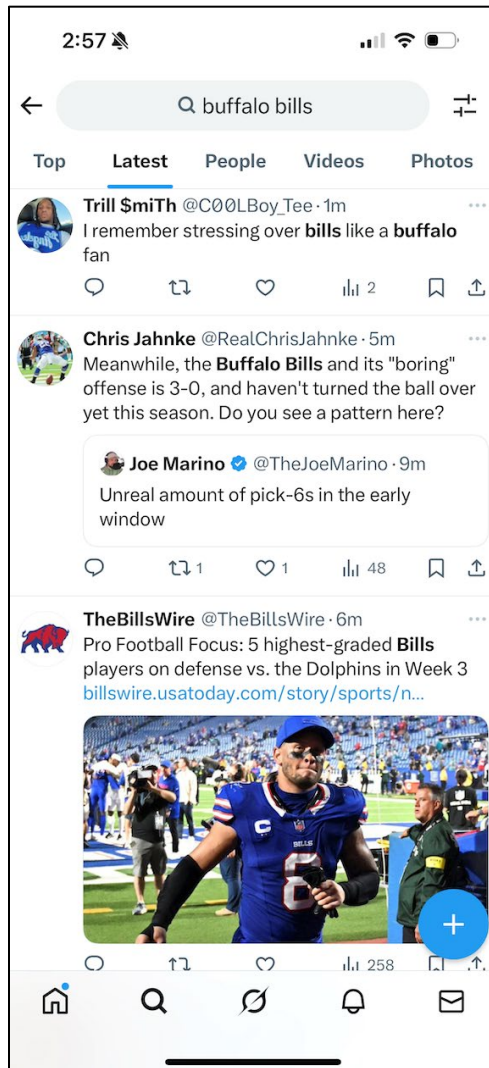
v. Search Query Retrieval

45. Using the searchable indices described above, X responds to subsequent user search activity by retrieving and ranking previously indexed web content.

46. Using the searchable indices described above, X responds to subsequent user search activity by retrieving and ranking previously indexed web content.

47. When a second user searches X, the system selects and transmits results that incorporate the indexed and ranked content from prior user engagement, in the manner disclosed in both the '952 Patents.

48. The below screenshot depicts X returning results in response to such a second user search query:



49. Separately, when a second user runs a search query for new third-party content by refreshing their “Feed,” the system selects and transmits results that incorporate the indexed and ranked content from prior user engagement, in the manner disclosed in both the ’952 Patents. The below screenshot depicts X returning results in response to a user refreshing their feed:



(2) X's Desktop Application Infringes the '952 Patent

50. X's desktop application infringes the '952 Patent in the same manner as X's mobile application. The desktop version of X operates through a standard web browser on a desktop or laptop computer but otherwise implements the same claimed methods and system architecture. In particular, X's desktop application allows a first user to view third-party web content in a main browser window while simultaneously providing a separate interaction interface—such as reply panels, repost and share controls, and engagement overlays—through which the user can interact with that content independently of the main browser window itself.

51. Through these separate interaction interfaces on desktop, X receives first-user submissions—including likes, comments, reposts, and shares—associated with identified third-party web content displayed in the browser. Those interactions are transmitted to X’s servers, where the identified content is indexed, stored, and ranked based on user engagement. X then uses those indexed and ranked results to populate search results, feeds, trending topics, and other discovery surfaces presented to second users.

52. The desktop application thus performs each element of at least Claim 1 of the ’952 Patent in a manner functionally identical to X’s mobile application. The only material difference between the two accused instrumentalities is the client device used to access X’s platform—i.e., a desktop or laptop computer instead of a mobile phone. That difference does not alter the underlying infringing functionality, which relies on the same separate interaction interfaces, server-side indexing and ranking by engagement, and subsequent retrieval of ranked content in response to user search queries. Accordingly, X’s desktop application directly infringes the ’952 Patent under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

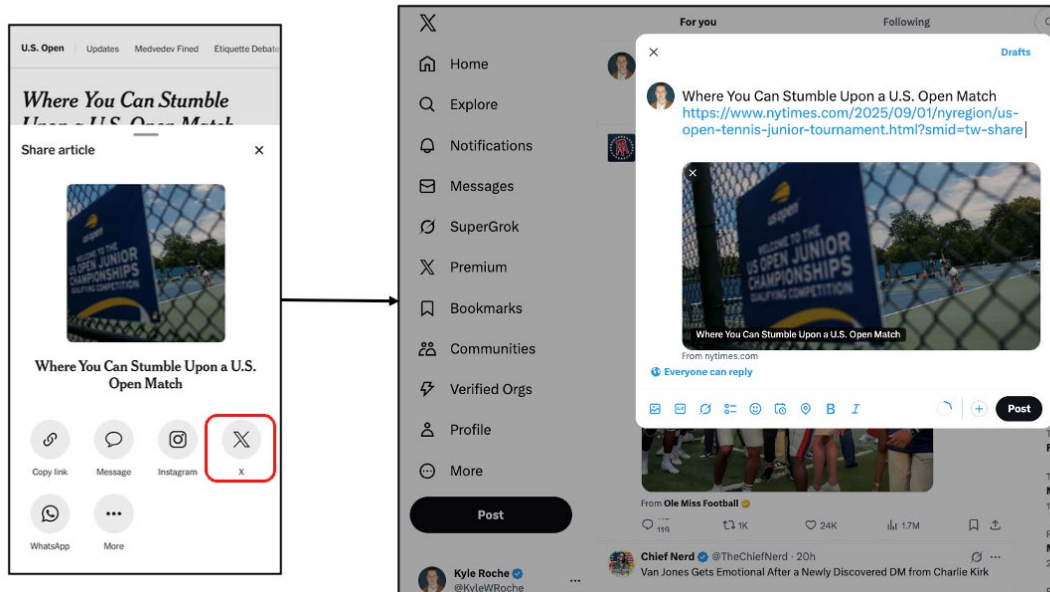
(3) X’s Mobile Application Infringes the ‘744 Patent

53. X also infringes the ’744 Patent through at least the following features:

i. Web Content Sharing Interface

54. X’s computer systems receive from a first client computer operated by a first user, an identification of web content displayed by a web browser of the first client computer in a main browser window, including the URL and associated metadata of third-party web pages hosted on domains distinct from X and that web content is transmitted by the first user to X through a separate user interface.

55. For example, the below screenshots show that a first user can send to X Corp.'s server computer web content displayed in their web browser, such as an article from New York Times (nytimes.com), and that a first user can transmit the web content to X Corp.'s servers via a user interface that is separate from the main browser window:



ii. Indexing and Ranking by Engagement

56. X's backend systems index and rank identified third-party web content based on those user interactions, directly mirroring the inventions' purpose of reflecting real user interest:

How do we choose Tweets?

The foundation of Twitter's recommendations is a set of core models and features that extract latent information from Tweet, user, and engagement data. These models aim to answer important questions about the Twitter network, such as, "What is the probability you will interact with another user in the future?" or, "What are the communities on Twitter and what are trending Tweets within them?" Answering these questions accurately enables Twitter to deliver more relevant recommendations.

The recommendation pipeline is made up of three main stages that consume these features:

- 1 Fetch the best Tweets from different recommendation sources in a process called **candidate sourcing**.
- 2 **Rank** each Tweet using a machine learning model.
- 3 Apply **heuristics and filters**, such as filtering out Tweets from users you've blocked, NSFW content, and Tweets you've already seen.

The service that is responsible for constructing and serving the For You timeline is called Home Mixer. Home Mixer is built on Product Mixer, our custom Scala framework that facilitates building feeds of content. This service acts as the software backbone that connects different candidate sources, scoring functions, heuristics, and filters.

This diagram below illustrates the major components used to construct a timeline:



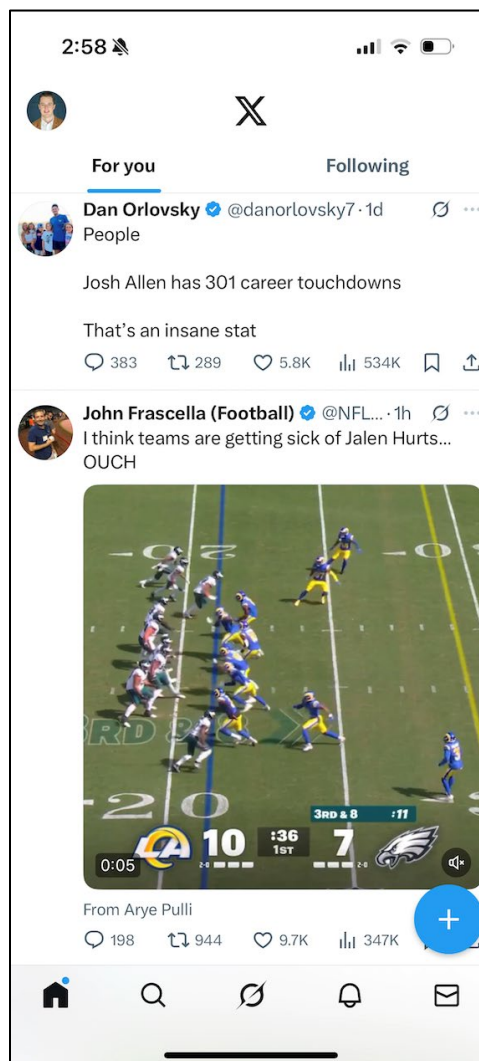
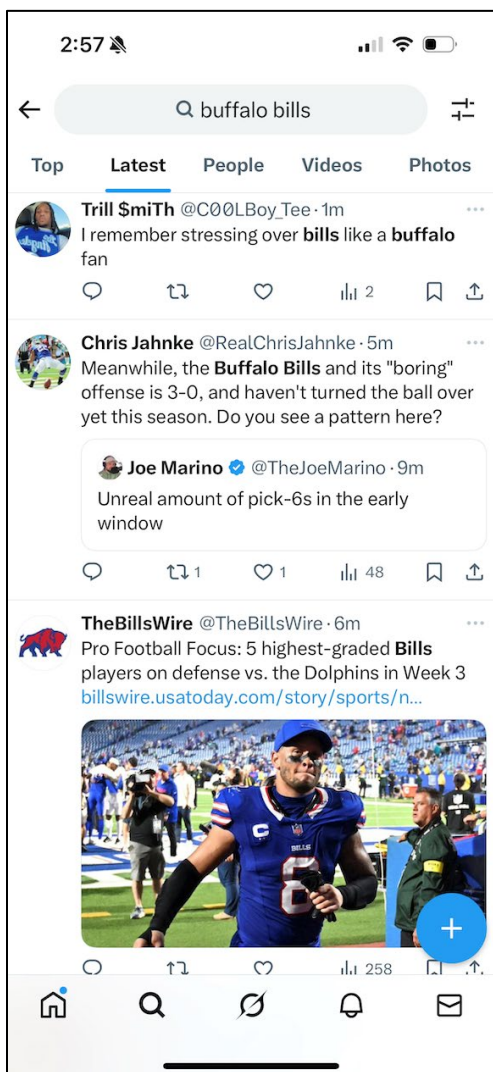
57. Upon receipt of the identification of third-party web content and associated user interactions through the separate interaction interface, X's backend systems store the identified web content in one or more searchable indices. These indices persistently associate the identified web content—including its URL, metadata, and engagement data—with corresponding user submissions, ratings, and interactions, rather than merely displaying the content transiently in an ephemeral feed. When users later submit search queries through X's search functionality, X's servers query these searchable indices to retrieve, rank, and return results that include the previously indexed web content in positions determined relative to other indexed content based on accumulated user engagement.

iii. Search Query Retrieval

58. Using the searchable indices described above, X responds to subsequent user search activity by retrieving and ranking previously indexed web content.

59. When a second user searches X, or when a second user runs a search query for new third-party content by refreshing their "Feed," the system selects and transmits results that

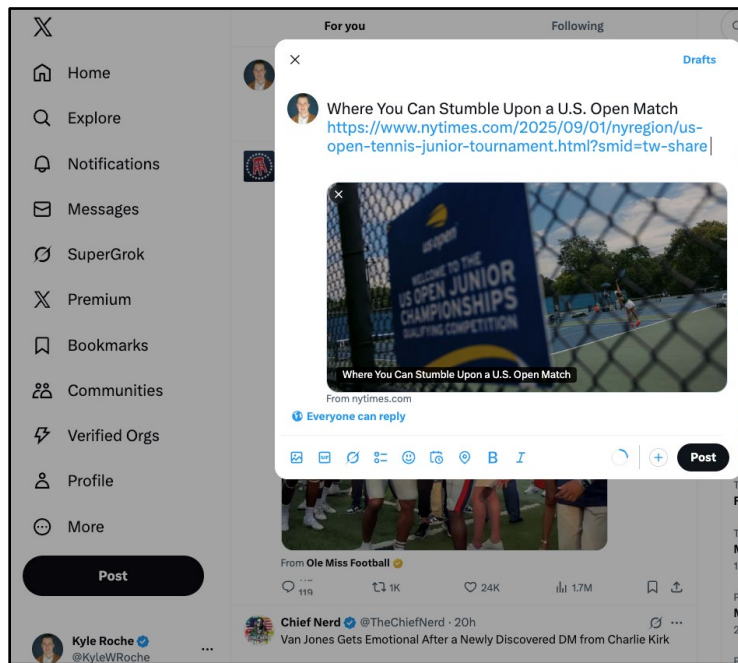
incorporate the indexed and ranked content from prior user engagement, in the manner disclosed in both the '744 Patents.



(4) X's Desktop Application Infringes the '744 Patent

60. X's desktop application infringes the '744 Patent in the same manner as X's mobile application. Although accessed through a desktop or laptop computer rather than a mobile device, X's desktop application implements the same claimed methods and system architecture. In particular, X's desktop application allows users to interact with and identify content through interfaces separate from the primary content display, and enabling those interactions to influence

and appear in other users' search results. For example, a first user can transmit the web content to X Corp.'s servers via a user interface that is separate from the main browser window:



61. Through these separate interfaces on desktop, X receives from a first user an identification of web content displayed in the browser, including the URL and associated metadata of third-party web pages hosted on domains distinct from X. X's servers receive that identification, index the identified web content, and associate it with user engagement data such as comments, reposts, and reactions submitted through the separate interaction interface. X then uses that indexed and engagement-ranked content to retrieve and transmit results to second users in response to search queries or feed refresh requests, with the position of the content determined relative to other user-identified content based on accumulated engagement.

62. The desktop application thus performs each element of at least Claim 1 of the '744 Patent in a manner functionally identical to X's mobile application. The only material difference between the two accused instrumentalities is the client device used to access X's platform—*i.e.*, a desktop or laptop computer instead of a mobile phone. That distinction does not alter the infringing

operation of X's systems, which rely on the same separate identification interface, server-side indexing and ranking of identified web content, and subsequent retrieval and presentation of ranked results to other users. Accordingly, X's desktop application directly infringes the '744 Patent under 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents.

* * *

63. X has never sought or obtained a license to the Patents-in-Suit, yet it has built core aspects of its platforms on these inventions. The result is ongoing, unauthorized use of Plaintiff's intellectual property that has caused—and will continue to cause—significant harm to Search and Share Technologies, LLC.

D. Harm to Plaintiff

64. Defendant's infringement of the Patents-in-Suit has caused, and continues to cause, substantial harm to Plaintiff. By incorporating Plaintiff's patented technology into X without authorization, Defendant has:

- Deprived Plaintiff of the ability to control and license its inventions;
- Unjustly enriched themselves by using patented methods to drive user engagement, retention, and monetization; and
- Eroded the exclusivity and market value of the Patents-in-Suit.

65. Defendants' infringement is not accidental. On information and belief, X has had actual knowledge of the Patents-in-Suit since at least the service of this Complaint, and in all likelihood well before. Despite that knowledge, X has continued to develop, market, and profit from the X platform. The continued use of the patented technology without authorization, particularly given X's size and sophistication, demonstrates willful infringement.

66. Defendant's continued infringement, despite this knowledge, is deliberate and egregious, rendering this an "exceptional case" within the meaning of 35 U.S.C. § 285 and warranting enhanced damages under 35 U.S.C. § 284.

67. Plaintiff has suffered, and will continue to suffer, damages in an amount to be determined at trial, and is entitled to recover all available legal and equitable remedies, including an injunction against further infringement.

CLAIMS FOR RELIEF

COUNT I — Infringement of U.S. Patent No. 10,180,952

68. Plaintiff re-alleges and incorporates by reference the allegations of the preceding paragraphs of this Complaint as if fully set forth herein.

69. Plaintiff is the sole owner, by assignment, of all rights, title, and interest in the '952 Patent, which was duly and legally issued by the United States Patent and Trademark Office on January 15, 2019. Plaintiff has the exclusive right to enforce the '952 Patent and to recover damages for all past, present, and future infringement.

70. X has directly infringed, and continues to directly infringe, one or more claims of the '952 Patent under 35 U.S.C. § 271(a) by making, using, selling, offering for sale, and importing into the United States the X platform which incorporates methods and systems claimed in the '952 Patent.

71. For example, X implements each element of Claim 1 of the '952 Patent, including by:

- Providing a first user interface (comment/share/reaction panels) separate from the main content display;
- Automatically selecting a portion of third-party content to display in that interface;
- Receiving a first user's submission (e.g., like, comment, share) through the interface;

- Indexing and ranking the content based on that submission;
- Receiving a second user's search query; and
- Selecting and transmitting search results that include the indexed content.

72. X's separate interaction interfaces also receive and apply settings from users that control how portions of third-party content are selected and displayed. Through the separate interfaces, users configure preferences and settings that govern, among other things:

- whether content previews are expanded or truncated;
- which comments or replies are shown first;
- the ordering and filtering of responses;
- whether sensitive or restricted content is displayed;
- how much of an article preview, caption, or media excerpt is presented.

73. Further evidence of infringement is reflected in the claim chart attached as Exhibit 1, which Plaintiff incorporates by reference herein.¹

74. These actions, performed in the United States, satisfy each and every element of at least Claim 1 of the '952 Patent literally and/or under the doctrine of equivalents.

75. Since at least the service of this Complaint, X has induced infringement under 35 U.S.C. § 271(b) by knowingly encouraging and instructing third parties to use X in a manner that directly infringes the '952 Patent. X provides detailed instructions, documentation, marketing materials, and in-app prompts designed to promote and facilitate infringing use. X's inducement has been willful, knowing, and with the specific intent to cause infringement.

¹ Plaintiff notes that the claim charts attached as Exhibits 1 and 2 to this Amended Complaint are based on publicly-available information obtained to date. X Corp.'s software and systems are proprietary, much of their functionality is kept in secrecy. Plaintiff expects that information to be revealed in future discovery may result in identification of additional instances of X Corp.'s infringement and may also enable identification of additional claims infringed by X Corp. Furthermore, these contentions are based upon Plaintiff's present interpretation of the scope of the patent claims at issue; under other interpretations, these contentions would not necessarily remain applicable.

76. X's infringement is, and has been, willful. On information and belief, X has had knowledge of the '952 Patent and its infringement thereof since at least the service of the Complaint on October 10, 2025, and likely well before, yet has continued to use Plaintiff's patented technology without authorization and has taken no action to abate its infringement. X's conduct is deliberate, egregious, and objectively reckless, rendering this an exceptional case under 35 U.S.C. § 285 and warranting enhanced damages under 35 U.S.C. § 284.

77. To the extent that X contends it lacked actual knowledge of its infringement of the '952 Patent prior to service of this Complaint, it willfully blinded itself to such infringement by deliberately avoiding investigating Plaintiff's patents or X's infringement.

78. As a direct and proximate result of X's infringement, Plaintiff has suffered and will continue to suffer substantial damages, in an amount to be determined at trial, including lost licensing revenue, price erosion, and harm to the value of the Patents-in-Suit. Plaintiff is entitled to all available remedies under the patent laws of the United States, including compensatory damages, enhanced damages, attorney's fees, costs, interest, and injunctive relief.

COUNT II — Infringement of U.S. Patent No. 11,106,744

79. Plaintiff re-alleges and incorporates by reference the allegations of the preceding paragraphs of this Complaint as if fully set forth herein.

80. Plaintiff is the sole owner, by assignment, of all rights, title, and interest in the '744 Patent, which was duly and legally issued by the United States Patent and Trademark Office on August 31, 2021. Plaintiff has the exclusive right to enforce the '744 Patent and to recover damages for all past, present, and future infringement.

81. X has directly infringed, and continues to directly infringe, one or more claims of the '744 Patent under 35 U.S.C. § 271(a) by making, using, selling, offering for sale, and importing

into the United States the X platform which incorporates methods and systems claimed in the '744 Patent.

82. By way of example, X implements each element of Claim 1 of the '744 Patent, including by:

- Using the separate interaction interface, a first user identifies web content displayed by the embedded web browser—for example, by sharing, reposting, or commenting on a third-party article opened within the browser.
- X's servers receive that identification from the first user device and index the identified web content. X associates the identified web content with user engagement data, including ratings, reactions, and comments submitted via the separate interaction interface. X indexes the identified third-party web content by storing and associating the transmitted URLs and corresponding metadata with user engagement data, enabling later retrieval and ranking of those third-party web pages in response to subsequent search queries.
- When a second user submits a search query through X's search functionality, or initiates a feed refresh request that functions as a real-time search for relevant content, X's servers transmit search results that include the web content previously identified by the first user. The position of that content in the results is determined relative to other web content identified by other users, based on indexed engagement data.
- Multiple users independently identify different third-party web pages via transmitted URLs through the separate user interface, and X's systems rank and position those identified web pages in search results relative to one another based on aggregated user engagement.

83. These actions, performed in the United States, satisfy each and every element of at least Claim 1 of the '744 Patent literally and/or under the doctrine of equivalents.

84. Further evidence of infringement is reflected in the claim chart attached as Exhibit 2, which Plaintiff incorporates by reference herein.

85. Since at least the service of this Complaint, X has induced infringement under 35 U.S.C. § 271(b) by knowingly encouraging and instructing third parties to use X in a manner that directly infringes the '744 Patent. X provides detailed instructions, documentation, marketing

materials, and in-app prompts designed to promote and facilitate infringing use. X's inducement has been willful, knowing, and with the specific intent to cause infringement.

86. X's infringement is, and has been, willful. On information and belief, X has had knowledge of the '744 Patent and its infringement thereof since at least the service of the Complaint on October 10, 2025, and likely well before, yet has continued to use Plaintiff's patented technology without authorization and has taken no action to abate its infringement. X's conduct is deliberate, egregious, and objectively reckless, rendering this an exceptional case under 35 U.S.C. § 285 and warranting enhanced damages under 35 U.S.C. § 284.

87. To the extent that X contends it lacked actual knowledge of its infringement of the '744 Patent prior to service of this Complaint, it willfully blinded itself to such infringement by deliberately avoiding investigating Plaintiff's patents or X's infringement.

88. As a direct and proximate result of X's infringement, Plaintiff has suffered and will continue to suffer substantial damages, in an amount to be determined at trial, including lost licensing revenue, price erosion, and harm to the value of the Patents-in-Suit. Plaintiff is entitled to all available remedies under the patent laws of the United States, including compensatory damages, enhanced damages, attorney's fees, costs, interest, and injunctive relief.

PRAYER FOR RELIEF

WHEREFORE, Search and Share respectfully requests that this Court enter judgment in its favor ordering, finding, declaring, and/or awarding Search and Share relief as follows:

- I. that X infringes the Patents-in-Suit;
- II. all equitable relief the Court deems just and proper as a result of X's infringement;
- III. an award of damages resulting from X's acts of infringement in accordance with 35 U.S.C. § 284;

- IV. that X's infringement of the Patents-in-Suit is willful;
- V. enhanced damages pursuant to 35 U.S.C. § 284;
- VI. that this is an exceptional case and awarding X its reasonable attorneys' fees pursuant to 35 U.S.C. § 285;
- VII. an accounting for acts of infringement and supplemental damages, without limitation, prejudgment and post-judgment interest; and
- VIII. such other equitable relief which may be requested and to which Plaintiff is entitled.

Dated: January 5, 2026

Respectfully Submitted,

/s/ Christopher J. Schwegmann

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**ATTORNEYS FOR PLAINTIFF
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LLC**

CERTIFICATE OF SERVICE

I certify that the foregoing document is true and correct and electronically filed *via ECF* on this 5th day of January, 2026.

/s/ Christopher J. Schwegmann
Christopher J. Schwegmann