

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NETWORK-1 TECHNOLOGIES, INC.

Plaintiff,

- against -

GOOGLE LLC and YOUTUBE, LLC

Defendants.

14 Civ. 2396 (PGG)

14 Civ. 9558 (PGG)

DEFENDANTS' SECOND SUPPLEMENTAL INVALIDITY CONTENTIONS

In accordance with Paragraph 6 of the Joint Proposed Case Management Plan (D.I. 137-1) and Local Patent Rule 7, Defendants Google LLC and YouTube, LLC (collectively, "Defendants") provide the following Supplemental Invalidity Contentions to Plaintiff Network-1 Technologies, Inc. ("Network-1"). The exclusion of any prior art reference, software, or system from this disclosure does not constitute an admission that such reference does not anticipate and/or render obvious one or more claims of the asserted patents. Additionally, to the extent that prior art software or systems embody or are related to the printed patents or publications recited in this disclosure, Defendants reserve the right to assert the individual printed patents or publications listed in this pleading, as well as any related prior art software or systems. Defendants reserve the right to supplement or amend this disclosure at any time, including but not limited to the right to supplement or amend this disclosure in response to further discovery, further analysis, further prior art searching, the assertion of additional claims by Network-1, Network-1's litigation positions, Network-1's proposed claim constructions, or the Court's claim construction ruling.

At this time, Defendants supplement their prior invalidity contentions to include the

following additional asserted grounds of invalidity of the asserted patents:

U.S. Patent No. 8,010,988

In addition to the grounds indicated in Defendants' prior invalidity contentions, all asserted claims of U.S. Patent No. 8,010,988 are invalid under 35 U.S.C. §§ 102 and 103 (Anticipation and Obviousness), because the following system(s), either individually or in combination with other prior art references identified by Defendants, disclose all elements of the asserted claims:

- The Relatable FreeAmp audio identification system, including when used in conjunction with the MusicBrainz audio information database.

U.S. Patent No. 8,205,237

In addition to the grounds indicated in Defendants' prior invalidity contentions, all asserted claims of U.S. Patent No. 8,205,237 are invalid under 35 U.S.C. §§ 102 and 103 (Anticipation and Obviousness), because the following system(s), either individually or in combination with other prior art references identified by Defendants, disclose all elements of the asserted claims:

- The Relatable FreeAmp audio identification system, including when used in conjunction with the MusicBrainz audio information database.

U.S. Patent No. 8,904,464

In addition to the grounds indicated in Defendants' prior invalidity contentions, all asserted claims of U.S. Patent No. 8,904,464 are invalid under 35 U.S.C. §§ 102 and 103 (Anticipation and Obviousness), because the following system(s), either individually or in combination with other prior art references identified by Defendants, disclose all elements of the asserted claims:

- The Relatable FreeAmp audio identification system, including when used in conjunction with the MusicBrainz audio information database.

Dated: August 30, 2019

/s/ Andrew V. Trask
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