

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Global Interactive Media, Inc.,

Plaintiff,

v.

A&E Television Networks, LLC,

Defendant.

Case No.

Judge:

Magistrate Judge:

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Global Interactive Media, Inc. (“Global Interactive”) brings this patent-infringement action against A&E Television Networks, LLC (“A&E”).

Parties

1. Global Interactive is a Belizian company based in Belize.
2. A&E is a corporation organized under the laws of Delaware, with its principal place of business located in New York, New York.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*
4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).
5. This Court may exercise personal jurisdiction over A&E. A&E conducts continuous and systematic business in Illinois and this District. A&E maintains corporate offices in this District. This patent-infringement case arises directly from A&E’s continuous and systematic activity in this District. In short, this

Court's exercise of jurisdiction over A&E would be consistent with the Illinois long-arm statute, 735 ILCS § 5/2-209, and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(1) and 1400(b).

Count 1 – Infringement of U.S. Patent No. 8,032,907

7. Global Interactive owns United States Patent 8,032,907 (the “'907 patent”) (attached as Exhibit A).

8. A&E is infringing at least one of the 90 methods and systems claimed in the '907 patent by providing the A&E Program Schedule service.

9. For example, and for illustration of one of the 90 claims of the '907 patent that Global Interactive alleges the A&E Program Schedule service infringes, the service infringes claim 18 of the '907 patent as follows:

- a. Claim 18 is a method of “broadcasting program material in at least one broadcast” (Ex. A, 19:16.) The A&E Program Schedule service contains listings of television programs that are broadcasted to consumers. <http://www.aetv.com/schedule>.
- b. Claim 18 is a method of “receiving one or more user inquiries from one or more recipients of said at least one broadcast, said one or more inquiries including broadcast identifier information” (Ex. A, 19:17-19.) A consumer using the A&E Program Schedule service may access the service's website and inquire about the television show *Criminal Minds* broadcast by A&E.

- c. The method of claim 18 involves “creating a program description file comprising program information related to program material to be broadcast in the future” (Ex. A, 19:20-22.) The individual inquiring about *Criminal Minds* would learn from the A&E Program Schedule service: “When a child is abducted at a local mall, the BAU locks down the area and must profile the people at the scene to retrieve the child.” <http://www.aetv.com/criminal-minds/season-3>.
- d. Next, claim 18 involves “communicating the program information into a programmed data processor” (Ex. A, 19:23-24.) The A&E user is able to learn about A&E’s *Criminal Minds* because A&E has a programmed data processor that communicates the program information to the A&E Program Schedule service.
- e. Claim 18 involves “synchronizing said communicated program information with said program material of said at least one broadcast. . . .” (Ex. A, 19:25-26.) A&E synchronizes the *Criminal Minds* program information with the broadcast of the *Criminal Minds* program.
- f. Claim 18 involves “using said data programmed data processor to communicate, to the one or more recipients, program information that corresponds to the broadcast identifier information included in said one or more inquiries, wherein at least one of the program description file, the program information, and the synchronized

program information is associated with the broadcast identifier information.” (Ex. A, 19:28-35.) The A&E Program Schedule service communicates the *Criminal Minds* program information to the A&E Program Schedule service user.

Count 2 – Infringement of U.S. Patent No. 6,314,577

10. Global Interactive owns United States Patent 6,314,577 (the “‘577 patent”) (attached as Exhibit B).

11. A&E is infringing at least one of the 130 methods and systems claimed in the ‘577 patent by providing the A&E Program Schedule service.

12. For example, and for illustration of one of the 130 claims of the ‘577 patent that Global Interactive alleges the A&E Program Schedule service infringes, the service infringes claim 94 of the ‘577 patent as follows:

a. Claim 94 is a “method for providing listeners or viewers of a radio or television broadcast with automated information about program material, comprising the steps of: broadcasting at least one radio or television broadcast” (Ex. B, 23:14-18.) The A&E Program Schedule service website contains listings of television programs that are broadcasted to consumers.

<http://www.aetv.com/schedule>.

b. Claim 94 involves “receiving user inquiries from a listener or viewer of said radio or television broadcast” (Ex. B, 19-20.) A consumer using the A&E Program Schedule service may access the

A&E Program Schedule service website and inquire about the television show *Criminal Minds* broadcast by A&E.

- c. Claim 94 involves “creating a program description file” (Ex. B, 23:21.) The individual inquiring about *Criminal Minds* would learn from the A&E Program Schedule service: “When a child is abducted at a local mall, the BAU locks down the area and must profile the people at the scene to retrieve the child.”
<http://www.aetv.com/criminal-minds/season-3>.
- d. The method of claim 94 involves “communicating program list information into a programmed data processor” (Ex. B, 23:23-24.) The A&E Program Schedule service user is able to learn about A&E’s *Criminal Minds* because A&E has a programmed data processor that communicates the program information to the A&E Program Schedule service.
- e. Claim 94 involves “correlating said program descriptions of program material with said program list information and generating information in a database responsive to only a broadcast identifier” (Ex. B, 23:24-27.) A&E correlates the communicated *Criminal Minds* program information with the broadcast of the *Criminal Minds* program.
- f. Claim 94 involves “using said programmed data processor to communicate said program description file responsive to said user inquiry.” The A&E Program Schedule service communicates the

Criminal Minds program information to the A&E Program Schedule service user.

Count 3 – Infringement of U.S. Patent No. 7,574,721

13. Global Interactive owns United States Patent 7,574,721 (the “’721 patent”) (attached as Exhibit C).

14. A&E is infringing at least one of the 35 methods and systems claimed in the ‘721 patent by providing the A&E Program Schedule service.

15. For example, and for illustration of one of the 35 claims of the ‘721 patent that Global Interactive alleges the A&E Program Schedule service infringes, the service infringes claim 20 of the ‘721 patent as follows:

- a. Claim 20 is a “A method for identifying at least one broadcast provider over a network in response to at least one user communication, wherein the at least one user communication comprises at least one user related broadcast identifier that is not required to by itself identify the at least one broadcast provider, the method comprising: receiving at least one user related network address associated with at least one user communication;” (Ex. C, 19:17-24.) The A&E Program Schedule service website identifies A&E as the broadcast provider of certain television programs to the user according to the user’s Internet Protocol address (“IP address”). For example, in response to a user’s communication, A&E is identified as the broadcaster of the

television show *Criminal Minds* available to the user.

<http://www.aetv.com/schedule>.

- b. Claim 20 involves “querying, by a processor, a database of one or more stored network addresses wherein each stored address or part thereof is indexed to one or more stored broadcast identifiers, wherein each of the stored broadcast identifiers is associated with at least one broadcast provider” (Ex. C, 19:25-29.) The A&E Program Schedule service queries a database of stored Internet Protocol addresses indexed to the broadcast schedule for *Criminal Minds*.
- c. Claim 20 involves “determining whether the received at least one user related network address matches at least one of the stored network addresses or parts thereof” (Ex. C, 19:30-32.) The A&E Program Schedule service determines whether the user’s IP address matches one of the stored IP addresses.
- d. In Claim 20, “if at least one of said stored network addresses or parts thereof matches the received at least one user related network address, retrieving one or more indexed broadcast identifiers corresponding to the at least one matching network address or part thereof” (Ex. C, 19:33-37.) Once the A&E Program Schedule service determines that the user’s IP address matches at least part of a stored IP addresses, the A&E Program Schedule service retrieves information related to the show *Criminal Minds*: “When a

child is abducted at a local mall, the BAU locks down the area and must profile the people at the scene to retrieve the child.”

<http://www.aetv.com/schedule>.

- e. Claim 20 involves “receiving said at least one user related broadcast identifier associated with at least one user communication” (Ex. C, 19:38-39.) The A&E Program Schedule service receives the user related broadcast identifier identifying the time and content of the *Criminal Minds* broadcast associated with the user’s communication.
- f. Claim 20 involves “identifying, by the processor, at least one broadcast provider using both said retrieved indexed one or more broadcast identifiers and said received at least one user related broadcast identifier, wherein the identifying of the at least one broadcast provider does not require identifying only a closest proximity broadcast provider based on the received at least one network address.” (Ex. C, 19:40-46.) The A&E Program Schedule service identifies that A&E is the broadcast provider of *Criminal Minds*: “Today Dec 02, 3pm, *Criminal Minds* “Seven Seconds.”
<http://www.aetv.com/schedule>.

Prayer for Relief

WHEREFORE, Global Interactive prays for the following relief against A&E:

- (a) Judgment that A&E has directly infringed claims of the '907 patent, the '577 patent, and the '721 patent;
- (b) For a reasonable royalty;
- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law; and
- (d) For such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

Global Interactive demands a trial by jury on all matters and issues triable by jury.

Date: December 19, 2014

/s/ Matthew M. Wawrzyn
Matthew M. Wawrzyn (#6276135)
Stephen C. Jarvis (#6309321)
WAWRZYN LLC
233 S. Wacker Dr., 84th Floor
Chicago, IL 60606
(312) 283-8330
matt@wawrzynlaw.com
stephen@wawrzynlaw.com

Counsel for Global Interactive Media, Inc.