

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

William Grecia,

Plaintiff,

v.

Charter Communications, Inc.,

Defendant.

Case No.

Judge:

Magistrate Judge:

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

William Grecia brings this patent-infringement action against Charter Communications, Inc. (“Charter”).

**Parties**

1. William Grecia is an individual. He maintains a residence in Downingtown, Pennsylvania.
2. Charter is a Delaware corporation, having its principal place of business in Stamford, Connecticut.

**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 Charter. This is because Charter conducts continuous and systematic business in Wisconsin and this

District. For example, Charter sells the “TV Everywhere” service to Charter customers in this District. As such, Charter uses and sells a cloud computing system that authorizes Charter users in this District access to digital content such as movies and television shows. This patent-infringement claim arises directly from Charter’s continuous and systematic activity in this District. In short, this Court’s exercise of jurisdiction over Charter would be consistent with the Wisconsin long-arm statute and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2).

### **Background**

7. William Grecia owns United States Patent 8,533,860 (the “‘860 patent”). William Grecia invented the methods, systems, and products claimed in the ‘860 patent.

8. The field of the invention of the ‘860 patent is digital rights management, commonly referred to as “DRM.” The movement of books, movies, and music to digital form has presented a challenge to the copyright owners of the content. The owners wish to sell the content in a digital form and transfer all attributes of ownership to the buyer, and yet the owners of the content must protect value by preventing “pirating” of the content through illicit, unauthorized copying.

9. The prior art had locked the purchased content, a movie for example, to specific devices and in some cases limited playback rights to a single device. These prior art DRM methods required the content providers to maintain computer servers to receive and send session authorization keys to clients, and the prior DRM methods required that the client reconnect with the servers to obtain reauthorization. These DRM schemes may

be characterized by limiting acquired content to a specific device that the client continually had to reauthorize to enjoy the acquired content.

10. The '860 invention provides a solution. With this invention, a consumer of digital content may enjoy the content on an unlimited number of the consumer's devices; enjoy the content with the consumer's friends and family, all while protecting against unlicensed use.

### **Claim of Patent Infringement**

11. William Grecia is the exclusive owner of the '860 patent, which is attached as Exhibit 1.

12. The '860 patent is valid and enforceable.

13. Charter has and is directly infringing claims of the '860 patent. For example, and without limiting the claims of the '860 patent asserted, Charter's sale of the TV Everywhere service directly infringes claim 10 of the '860 patent.

### **Prayer for Relief**

WHEREFORE, William Grecia prays for the following relief against Charter:

- (a) Judgment that Charter has directly infringed claims of the '860 patent claims;
- (b) For a reasonable royalty;
- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) For such other and further relief as the Court may deem just and proper.

### **Demand for Jury Trial**

William Grecia demands a trial by jury on all matters and issues triable by jury.

Dated: May 12, 2015

Respectfully submitted,



By: \_\_\_\_\_

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