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

Global Interactive Media, Inc.,	Case No.
Plaintiff,	
v.	Judge:
	Magistrate Judge:
FX Networks, LLC,	**JURY TRIAL DEMANDED**
Defendant.	

COMPLAINT FOR PATENT INFRINGEMENT

Global Interactive Media, Inc. ("Global Interactive") brings this patent-infringement action against FX Networks, LLC ("FX").

Parties

1.   Global Interactive is a Belizian company based in Belize.

2.   FX is a company organized under the laws of Delaware, with its principal place of business located in Los Angeles, California.

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 FX. FX conducts continuous and systematic business in Illinois and this District. This patent-infringement case arises directly from FX's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over FX 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)(2) 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.   FX is infringing at least one of the 90 methods and systems claimed in the '907 patent by providing the FX Full Schedule service.

9.   For example, and for illustration of one of the 90 claims of the '907 patent that Global Interactive alleges the FX Full 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 FX Full Schedule service contains listings of television programs that are broadcasted to consumers. http://www.fxnetworks.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 FX Full Schedule service may access the service's website and inquire about the television show *American Horror Story* broadcast by FX.

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 *American Horror Story* would learn from the FX Full Schedule service: "Recent disappearances around camp raise Ethel's suspicion of Elsa. Gloria makes a last ditch effort to contain Dandy's bloodlust." http://www.fxnetworks.com/schedule (pop-up over *American Horror Story*)..

d. Next, claim 18 involves "communicating the program information into a programmed data processor . . . ." (Ex. A, 19:23-24.) The FX Full Schedule service user is able to learn about FX's *American Horror Story* because FX has a programmed data processor that communicates the program information to the FX Full 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.) FX synchronizes the *American Horror Story* program information with the broadcast of the *American Horror Story* 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

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description file, the program information, and the synchronized

program information is associated with the broadcast identifier

information." (Ex. A, 19:28-35.) The FX Full Schedule service

communicates the *American Horror Story* program information to

the FX Full 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.   FX is infringing at least one of the 130 methods and systems claimed

in the '577 patent by providing the FX Full Schedule service.

12.   For example, and for illustration of one of the 130 claims of the '577

patent that Global Interactive alleges the FX Full 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 FX Full Schedule
>
>   service website contains listings of television programs that are
>
>   broadcasted to consumers. http://www.fxnetworks.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 FX Full Schedule service may access the FX

Full Schedule service website and inquire about the television show *American Horror Story* broadcast by FX.

c. Claim 94 involves "creating a program description file . . . ." (Ex. B, 23:21.) The individual inquiring about *American Horror Story* would learn from the FX Full Schedule service: "Recent disappearances around camp raise Ethel's suspicion of Elsa. Gloria makes a last ditch effort to contain Dandy's bloodlust." http://www.fxnetworks.com/schedule (pop-up over *American Horror Story*).

d. The method of claim 94 involves "communicating program list information into a programmed data processor . . . ." (Ex. B, 23:23-24.) The FX Full Schedule service user is able to learn about FX's *American Horror Story* because FX has a programmed data processor that communicates the program information to the FX Full 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.) FX correlates the communicated *American Horror Story* program information with the broadcast of the *American Horror Story* program.

f. Claim 94 involves "using said programmed data processor to communicate said program description file responsive to said user

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inquiry." The FX Full Schedule service communicates the

American Horror Story program information to the FX Full 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.   FX is infringing at least one of the 35 methods and systems claimed in

the '721 patent by providing the FX Full Schedule service.

15.   For example, and for illustration of one of the 35 claims of the '721

patent that Global Interactive alleges the FX Full Schedule service infringes, the

service infringes claim 20 of the '721 patent as follows:

    a. Claim 20 is "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 FX Full Schedule service website identifies

        FX, FXX, and FXM as the broadcast providers of certain television

        programs and movies available to the user based on the user's

        Internet Protocol address ("IP address") and in response to the

        "user related broadcast identifier," e.g., date for which the user

wants to identify a broadcast provider of programming. For example, in response to a user's communication, FX is identified as the broadcast provider of the television show *How I Met Your Mother*, FXX is identified as the broadcast provider of the television show *The Simpsons*, and FXM is identified as the broadcast provider of the movie *Moneyball* on December 18, 2014 at 8:00 pm. http://www.fxnetworks.com/schedule/2014-12-18/Pacific.

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 FX Full Schedule service queries a database of stored IP addresses indexed to broadcast identifiers, e.g., content programming by date.

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 FX Full 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 FX Full Schedule service determines that the user's IP address matches at least part of a stored IP address, the FX Full Schedule service retrieves broadcast identifiers that identify the programming of FX, FXX, and FXM corresponding to the user's IP address.

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 FX Full Schedule service receives the user related broadcast identifier identifying the date for which the user wants to identify a broadcast provider of programming when the user selects a date.

http://www.fxnetworks.com/schedule/

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 FX Full Schedule service, using, for example, the user's related broadcast identifier of December 18, 2014, identifies FX as the broadcast provider of the television show *How I Met Your Mother*, FXX as the broadcast

provider of the television show *The Simpsons*, and FXM as the
broadcast provider of the movie *Moneyball* on December 18, 2014
at 8:00 pm. http://www.fxnetworks.com/schedule/2014-12-
18/Pacific.

Prayer for Relief

WHEREFORE, Global Interactive prays for the following relief against FX:

(a)   Judgment that FX 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.