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15 *Counsel for William Grecia*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 William Grecia,
20 Plaintiff,
21 v.
22 DISH Network L.L.C.
23 Defendant.

Case No. 3:15-cv-02808-WHA
Judge: Hon. William Alsup

JURY TRIAL DEMANDED

24 **FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

25 William Grecia brings this patent-infringement action against DISH Network L.L.C.
26 (“DISH”)

27 **Parties**

28 1. William Grecia is an individual. He maintains a residence in Downingtown,
Pennsylvania.

1 9. The prior art had locked the purchased content, a movie for example, to specific
2 devices and in some cases limited playback rights to a single device. These prior art DRM methods
3 required the content providers to maintain computer servers to receive and send session
4 authorization keys to clients, and the prior DRM methods required that the client reconnect with
5 the servers to obtain reauthorization. These DRM schemes may be characterized by limiting
6 acquired content to a specific device that the client continually had to reauthorize to enjoy the
7 acquired content.

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

11 **Count 1 – Infringement of U.S. Patent No. 8,533,860**

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

14 12. The '860 patent is valid and enforceable.

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

18 **Count 2 – Infringement of U.S. Patent No. 8,402,555**

19 14. William Grecia is the exclusive owner of the '555 patent, which is attached as
20 Exhibit 2.

21 15. The '555 patent is valid and enforceable.

22 16. DISH has and is directly infringing claims of the '555 patent. For example, and
23 without limiting the claims of the '555 patent asserted, DISH's sale of the TV Everywhere service
24 directly infringes claim 12 of the '555 patent.

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Prayer for Relief

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

- (a) Judgment that DISH has directly infringed claims of the ‘860 patent and the ‘555 patent;
- (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.

Date: November 18, 2015

Respectfully Submitted,

/s/ Matthew M. Wawrzyn

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