

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

Global Interactive Media, Inc.,

Plaintiff,

v.

Entercom Communications Corp.,

Defendant.

Case No.

Judge:

Magistrate Judge:

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Global Interactive Media, Inc. (“GIM”) brings this patent-infringement action against Entercom Communications Corp. (“Entercom”).

**Parties**

1. GIM is a Belizian company based in Belize.
2. Entercom is incorporated under the laws of Pennsylvania, with its principal place of business located in Bala Cynwyd, Pennsylvania.

**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 Entercom. Entercom conducts continuous and systematic business in Wisconsin and this District. This patent-infringement case arises directly from Entercom’s continuous and systematic activity in

this District, for example, Entercom’s operation of radio station FM 99.1 – The Mix in Milwaukee and the website [www.991themix.com](http://www.991themix.com). In short, this Court’s exercise of jurisdiction over Entercom 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) and 1400(b).

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

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

8. Entercom is infringing at least one of the 90 methods and systems claimed in the ‘907 patent.

9. For example, and for illustration of one of the 90 claims of the ‘907 patent that GIM alleges that Entercom infringes, Entercom 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.) Entercom’s radio station FM 99.1 – The Mix in Milwaukee broadcasts adult contemporary music.
- 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 of music broadcast over FM 99.1 in Milwaukee may access the website [www.991themix.com](http://www.991themix.com) and inquire regarding the music being broadcast over FM 99.1 in Milwaukee.

- 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.) Entercom allows consumers to inquire regarding the music being broadcast by, prior to the broadcast, creating files describing the music to be broadcast.
- d. Next, claim 18 involves “communicating the program information into a programmed data processor . . . .” (Ex. A, 19:23-24.) The Entercom consumer is able to learn that *Animals* by the band Maroon 5 is currently being broadcast because Entercom has a programmed data processor into which the program description file is loaded. The user can also learn from Entercom that “[a] mix of polished pop/rock and neo-soul made Maroon 5 one of the most popular bands of the new millennium.”
- e. Claim 18 involves “synchronizing said communicated program information with said program material of said at least one broadcast. . . .” (Ex. A, 19:25-26.) Entercom synchronizes the description of *Animals* and Maroon 5 with the broadcast of the song.
- 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.) Entercom communicates the *Animals* and Maroon 5 program information to the Entercom consumer.

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

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

11. Entercom is infringing at least one of the 130 methods and systems claimed in the ‘577 patent.

12. For example, and for illustration of one of the 130 claims of the ‘577 patent that GIM alleges that Entercom infringes, Entercom 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.) Entercom’s radio station FM 99.1 The Mix in Milwaukee broadcasts adult contemporary music.
- b. Claim 94 involves “receiving user inquiries from a listener or viewer of said radio or television broadcast . . . .” (Ex. B, 19-20.) A consumer of music broadcast over FM 99.1 in Milwaukee may access the website [www.991themix.com](http://www.991themix.com) and inquire regarding the music being broadcast over FM 99.1 in Milwaukee.
- c. Claim 94 involves “creating a program description file . . . .” (Ex. B, 23:21.) Entercom allows consumers to inquire regarding the music

being broadcast by, prior to the broadcast, creating files describing the music to be broadcast.

- d. The method of claim 94 involves “communicating program list information into a programmed data processor . . . .” (Ex. B, 23:23-24.) The Entercom consumer is able to learn that *Animals* by the band Maroon 5 is currently being broadcast because Entercom has a programmed data processor into which the program description file is loaded. The user can also learn from Entercom that “[a] mix of polished pop/rock and neo-soul made Maroon 5 one of the most popular bands of the new millennium.”
- 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.) Entercom correlates the communicated *Animals* and Maroon 5 program information with the broadcast of *Animals*.
- f. Claim 94 involves “using said programmed data processor to communicate said program description file responsive to said user inquiry.” Entercom communicates the *Animals* and Maroon 5 program information to the consumer.

### **Prayer for Relief**

WHEREFORE, GIM prays for the following relief against Entercom:

- (a) Judgment that Entercom has directly infringed claims of the ‘907 patent and the ‘577 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**

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

Date: January 15, 2016

Respectfully Submitted,

/s/ Matthew M. Wawrzyn

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