

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

Global Interactive Media, Inc.,

Plaintiff,

v.

Comcast Corporation,

Defendant.

Case No.

Judge:

Magistrate Judge:

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Global Interactive Media, Inc. (“Global”) brings this patent-infringement action against Comcast Corporation (“Comcast”).

Parties

1. Global is a Belizian company based in Belize.
2. Comcast is a Pennsylvanian corporation, having its principal place of business in Philadelphia, 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 Comcast. Comcast conducts continuous and systematic business in Illinois and this District. This patent-infringement case arises directly from Comcast’s continuous and systematic activity in this District. In short, this Court’s exercise of jurisdiction over Comcast 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. 7,574,721

7. Global owns United States Patent 7,574,721 (the “‘721 patent”) (attached as Exhibit A).

8. Comcast is infringing at least one of the 35 methods and systems claimed in the ‘721 patent by providing the Comcast TV Listings service.

9. For example, and for illustration of one of the 35 claims of the ‘721 patent that Global alleges the Comcast TV Listings service infringes, the service infringes claim 1 of the ‘721 patent as follows:

- a. Claim 1 is “A method for identifying at least one broadcast provider through a combination of a geographic identification code and a broadcast identifier, the method comprising: digitally storing, in a database, one or more geographic identification codes that are each associated with at least one area or location in which a broadcast is receivable from at least one broadcast provider; . . .” (Ex. A, 17:44-50.) The Comcast TV Listings service digitally stores zip codes in a database, which are associated with service areas in which broadcasts are receivable from broadcast providers.
- b. Claim 1 involves “digitally storing, in the database, one or more broadcast identifiers that are each associated with at least one broadcast

provider; . . .” (Ex. A, 17:51-53.) The Comcast TV Listings service digitally stores in a database broadcast identifiers (e.g., date and time for which a user wants to identify a broadcast provider of programming) that are associated with broadcast providers.

- c. Claim 1 involves “receiving at least one user related geographic identification code; . . .” (Ex. A, 17:54-55.) The Comcast TV Listings service receives a user related geographic identification code when the user enters her zip code into the service website. <http://xfinitytv.comcast.net/tv-listings> (pop-up over “Change Lineup” button).
- d. Claim 1 involves “receiving at least one user related broadcast identifier” (Ex. A, 17:56.) The Comcast TV Listings service receives a user related broadcast identifier when the user enters into the service website the date and time for which she would like to identify a broadcast provider. <http://xfinitytv.comcast.net/tv-listings#date;> [http://xfinitytv.comcast.net/tv-listings#timeselector.](http://xfinitytv.comcast.net/tv-listings#timeselector)
- e. Claim 1 involves “determining, by a processor, a subset of data from the database using the received at least one user related geographic identification code” (Ex. A, 17:60-62.) The Comcast TV Listings service determines by processor, using the user’s zip code, a subset of data comprising broadcast programming available to the user based on her service area. <http://xfinitytv.comcast.net/tv-listings>.

f. Claim 1 involves “identifying, by the processor, at least one broadcast provider using at least both the subset of data and received at least one user related broadcast identifier” (Ex. A, 18:1-3.) The Comcast TV Listings service, identifies, for example, WBBM as the broadcast provider of the television show *Dr. Phil*, Season 13, Episode 84, “15 and a Teenage Terror” using the subset of data determining that WBBM is available in the user’s service area of the 60602 zip code, and the user related broadcast identifier of March 25, 2015 at 3:00 p.m. <http://xfinitytv.comcast.net/tv-listings> (pop-up over *Dr. Phil*).

Count 2 – Infringement of U.S. Patent No. 8,032,907

10. Global owns United States Patent 8,032,907 (the “‘907 patent”) (attached as Exhibit B).

11. Comcast is infringing at least one of the 90 methods and systems claimed in the ‘907 patent by providing the Comcast TV Listings service.

12. For example, and for illustration of one of the 90 claims of the ‘907 patent that Global alleges that the Comcast TV Listings 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. B, 19:16.) The Comcast TV Listings service contains listings of television programs that are broadcasted to consumers. <http://xfinitytv.comcast.net/tv-listings>.
- 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. B, 19:17-19.) A consumer using the Comcast TV Listings service may access the service’s website and inquire about the television show *Dr. Phil* broadcast by Comcast.

- 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. B, 19:20-22.) The individual inquiring about *Dr. Phil* would learn from the TV Listings service: “A mother seeks advice for handling her out-of-control teenage daughter.” <http://xfinitytv.comcast.net/tv-listings> (pop-up over *Dr. Phil*).
- d. Next, claim 18 involves “communicating the program information into a programmed data processor” (Ex. B, 19:23-24.) The Comcast TV Listings service user is able to learn about Comcast’s broadcast of *Dr. Phil* because Comcast has a programmed data processor that communicates the program information to the Comcast TV Listings service.
- e. Claim 18 involves “synchronizing said communicated program information with said program material of said at least one broadcast. . . .” (Ex. B, 19:25-26.) Comcast synchronizes the *Dr. Phil* program information with the broadcast of the *Dr. Phil* 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. B, 19:28-35.)

The Comcast TV Listings service communicates the *Dr. Phil* program information to the Comcast TV Listings service user.

Count 3 – Infringement of U.S. Patent No. 6,314,577

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

14. Comcast is infringing at least one of the 130 methods and systems claimed in the ‘577 patent by providing the Comcast TV Listings service.

15. For example, and for illustration of one of the 130 claims of the ‘577 patent that Global alleges the Comcast TV Listings 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. C, 23:14-18.) The Comcast TV Listings service website contains listings of television programs that Comcast broadcasts to consumers. <http://xfinitytv.comcast.net/tv-listings>.
- b. Claim 94 involves “receiving user inquiries from a listener or viewer of said radio or television broadcast” (Ex. C, 19-20.) A consumer using the Comcast TV Listings service may access the Comcast TV

Listings service website and inquire about the television show *Dr. Phil* broadcast by Comcast.

- c. Claim 94 involves “creating a program description file” (Ex. C, 23:21.) The individual inquiring about *Dr. Phil* would learn from the Comcast TV Listings service: “A mother seeks advice for handling her out-of-control teenage daughter.” <http://xfinitytv.comcast.net/tv-listings> (pop-up over *Dr. Phil*).
- d. The method of claim 94 involves “communicating program list information into a programmed data processor” (Ex. C, 23:23-24.) The Comcast TV Listings service user is able to learn about *Dr. Phil*, broadcast by Comcast, because Comcast has a programmed data processor that communicates the program information to the Comcast TV Listings 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. C, 23:24-27.) Comcast correlates the communicated *Dr. Phil* program information with the broadcast of the *Dr. Phil* program.
- f. Claim 94 involves “using said programmed data processor to communicate said program description file responsive to said user inquiry.” The Comcast TV Listings service communicates the *Dr. Phil* program information to the Comcast TV Listings service user.

Prayer for Relief

WHEREFORE, Global prays for the following relief against Comcast:

- (a) Judgment that Comcast has directly infringed claims of the '721 patent, '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

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

Date: April 26, 2016

Respectfully Submitted,

/s/ Matthew M. Wawrzyn
Matthew M. Wawrzyn (#6276135)
matt@wawrzynlaw.com
Stephen C. Jarvis (#6309321)
stephen@wawrzynlaw.com
WAWRZYN & JARVIS LLC
233 S. Wacker Drive, 84th Floor
Chicago, IL 60606
Phone: (847) 274-9844
Fax: 312.283.8331

Counsel for Global Interactive Media, Inc.