

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

GLOBAL INTERACTIVE MEDIA, INC.

Plaintiff,

v.

SINCLAIR BROADCAST GROUP, INC.

Defendant.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Global Interactive Media, Inc. (“GIM”) brings this patent-infringement action against Sinclair Broadcast Group, Inc. (“Sinclair”).

Parties

1. GIM is a Belizian corporation based in Belize.
2. Sinclair is a Maryland corporation, having its principal place of business in Baltimore, Maryland.

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 Sinclair. Sinclair conducts continuous and systematic business in Wisconsin and in this District and has regular and established places of business in this District. For example, Sinclair owns and operates WCGV, a television broadcast station, located in this District. This patent-infringement claim arises

directly from Sinclair's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over Sinclair 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. § 1400(b). Sinclair has regular and established places of business in this District and has committed acts of infringement in this District.

Count 1 – Infringement of U.S. Patent No. 7,574,721

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

8. Sinclair is infringing at least one of the 35 methods and systems claimed in the ‘721 patent by providing the “Designated Market Area” service (“DMA”). <http://sbgi.net/tv-stations/>.

9. For example, and for illustration of one of the 35 claims of the ‘721 patent that GIM alleges the Sinclair DMA 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 Sinclair DMA service, which identifies Sinclair broadcast providers, digitally stores region codes in a database, which are associated with market areas in which Sinclair broadcasts are receivable.

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 Sinclair DMA service digitally stores in a database broadcast identifiers—broadcast call signs (e.g., WBUI, WCCU, WICD, WICS, WRSP)—that correspond to broadcast providers.

c. Claim 1 involves “receiving at least one user related geographic identification code[.]” (Ex. A, 17:54-55.) The Sinclair DMA service receives a user related geographic identification code when the user selects her market area within the Sinclair DMA map, central Illinois for example.

d. 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, the subset of data comprising at least one of the stored one or more broadcast identifiers that are associated with at least one of the stored one or more geographic identification codes that corresponds to the received at least one user related geographic identification code[.]” (Ex. A, 17:60-67.) The Sinclair DMA service determines by processor, using the user’s market area, a subset of data comprising stored call signs that correspond to Sinclair broadcast providers available in the user’s selected service area.

e. Claim 1 involves “receiving at least one user related broadcast identifier[.]” (Ex. A, 17:56.) The Sinclair DMA service receives a user related broadcast identifier when the user selects the subscription package for which she would like to identify a broadcast provider. For example, the user may select “WBUI.”

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 Sinclair DMA service—using the subset of data based on the service area and the user-related broadcast identifier of, for example, WBUI—identifies, for example, the broadcast provider The CW on channel 23 in Decatur, Illinois.

Prayer for Relief

WHEREFORE, GIM prays for the following relief against Sinclair:

- (a) Judgment that Sinclair has directly infringed claims of 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

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

Date: July 7, 2017

Respectfully Submitted,

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