IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PROGME CORPORATION 211 Cedar Bend Drive Lake Orion, MI 48362,	Civil Action No. 2:18-cv-11057
	District Judge Denise Page Hood Magistrate Judge Mona K. Majzoub
Plaintiff	
v.	**JURY TRIAL DEMANDED**
FOX BROADCASTING COMPANY, LLC 10201 W. Pico Blvd., Bldg. 1003220 Los Angeles, CA 90064-2606,	**SECOND AMENDED COMPLAINT** **FOR PATENT INFRINGEMENT**

FOX TELEVISION STATIONS, LLC
1999 S. Bundy Dr.
Los Angeles, CA 90025

FOX NEWS NETWORK, LLC
1211 Avenue of the Americas
New York, NY 10036

NEW WORLD COMMUNICATIONS OF DETROIT, INC.
400 N. Capital St., NW, Ste. 890
Washington, DC 20001

GRAHAM MEDIA GROUP, MICHIGAN, INC.
550 W. Lafayette Blvd.
Detroit, MI 48226

GRAHAM MEDIA GROUP, INC.
161 N. Clark St., Ste. 2900
Chicago, IL 60601

SCRIPPS BROADCASTING HOLDINGS LLC
312 Walnut St., 28th Fl.
Cincinnati, OH 45202-4067

SCRIPPS MEDIA, INC.
312 Walnut St., 28th Fl.
Cincinnati, OH 45202-4067

DETROIT TELEVISION STATION WKBD INC.

1

1725 Desales St., NW, Ste. 501
Washington, DC 20036

CBS BROADCASTING INC.
1725 Desales St., NW, Ste. 501
Washington, DC 20036

ADELL BROADCASTING CORPORATION
35000 Adell Drive
Mt. Clemons, MI 48035,

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Defendants

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Plaintiff Progme Corporation (hereinafter termed "Progme"), by counsel, files this **SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT** against Defendant Fox Broadcasting Company, LLC (hereinafter termed "Fox Broadcasting"), Defendant Fox Television Stations, LLC (hereinafter termed "Fox Television Stations"), Defendant Fox News Network, LLC (hereinafter termed "Fox News"), Defendant New World Communications of Detroit, Inc. (hereinafter termed "New World Communications"), Defendant Graham Media Group, Michigan, Inc. (hereinafter termed "Graham Media Group Michigan"), Defendant Graham Media Group, Inc. (hereinafter termed "Graham Media Group"), Defendant Scripps Broadcasting Holdings LLC (hereinafter termed "Scripps Broadcasting"), Defendant Scripps Media, Inc. (hereinafter termed "Scripps Media"), Defendant Detroit Television Station WKBD Inc. (hereinafter termed "WKBD-TV"), Defendant CBS Broadcasting Inc. (hereinafter termed "CBS") and Defendant Adell Broadcasting Corporation (hereinafter termed "Adell Broadcasting") for infringement of U.S. Patent No. RE47,735 ("'735 Patent"). A copy of the '735 Patent is attached as **Exhibit A.**

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THE PARTIES

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1. Progme is a corporation organized and existing under the laws of Michigan with its principal place of business at 211 Cedar Bend Drive, Lake Orion, MI 48362.

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2

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2. On information and belief, Defendant Fox Broadcasting is a subsidiary of Fox Corporation, a corporation existing under the laws of the state of Delaware, and Defendant Fox Broadcasting is a legal liability company organized and existing under the laws of Delaware with its principal place of business at 10201 W. Pico Blvd., Bldg. 1003220, Los Angeles, CA 90064-2606.

3. On information and belief, Defendant Fox Television Stations is a subsidiary of Fox Corporation, a corporation organized and existing under the laws of the state of Delaware, and Defendant Fox Television Stations is a legal liability company organized and existing under the laws of Delaware with its principal place of business at 1999 S. Bundy Dr., Los Angeles, CA 90025.

4. On information and belief, Defendant Fox News is a subsidiary of Fox Corporation, a corporation organized and existing under the laws of the state of Delaware, and Defendant Fox News is a limited liability company organized and existing under the laws of the state of Delaware, with its principal place of business located at 1211 Avenue of the Americas, New York, New York10036.

5. On information and belief, Defendant New World Communications is a subsidiary of Fox Corporation, a corporation organized and existing under the laws of the state of Delaware, and Defendant New World Communications is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business located at 400 N. Capital St., NW, Ste. 890, Washington, DC 20001.

6. On information and belief, Defendant Graham Media Group Michigan is a subsidiary of Defendant Graham Media Group, a corporation organized and existing under the laws of the state of Delaware, and Defendant Graham Media Group Michigan is a corporation

organized and existing under the laws of the state of Delaware, with its principal place of business located at 550 W. Lafayette Blvd., Detroit, MI 48226.

7. On information and belief, Defendant Graham Media Group Michigan is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business located at 161 N. Clark St., Ste. 2900, Chicago, IL 60601.

8. On information and belief, Defendant Scripps Broadcasting is a subsidiary of E.W. Scripps Company, a corporation organized and existing under the laws of the state of Ohio, and Defendant Scripps Broadcasting is a legal liability company organized and existing under the laws of the state of Nevada, with its principal place of business located at 312 Walnut St., 28th Fl., Cincinnati, OH 45202-4067.

9. On information and belief, Defendant Scripps Media is a subsidiary of E.W. Scripps Company, a corporation organized and existing under the laws of the state of Ohio, and Defendant Scripps Media is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business located at 312 Walnut St., 28th Fl., Cincinnati, OH 45202-4067.

10. On information and belief, Defendant WKBD-TV is a subsidiary of Defendant CBS, a corporation organized and existing under the laws of the state of New York, and Defendant WKBD-TV is a corporation organized and existing under the laws of the state of Virginia, with its principal place of business located at 1725 Desales St., NW, Ste. 501, Washington, DC 20036.

11. On information and belief, Defendant CBS is a corporation organized and existing under the laws of the state of New York, with its principal place of business located at 51 West 52nd Street, New York, NY 10019.

12. On information and belief, Defendant Adell Broadcasting is a corporation organized and existing under the laws of the state of Michigan, with its principal place of business located at 35000 Adell Drive, Mt. Clemons, MI 48035.

JURISDICTION AND VENUE

13. This action arises under the patent laws of the United States, 35 U.S.C. § 1, et seq. including 35 U.S.C. § 271. This Court has exclusive subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

14. This Court has personal jurisdiction over Defendants for at least the following reasons: 1) Defendants have committed acts of patent infringement in Michigan and specifically in this Judicial District and 2) Defendants have purposefully established systematic and continuous contacts in this Judicial District and should reasonably expect to be haled into Court here.

15. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c), and 1400(b) because Defendants regularly do or solicit business, engage in other persistent courses of conduct and/or derive substantial revenue from goods and services provided to individuals and/or businesses in Michigan and specifically in this Judicial District.

JOINDER

16. Joinder of Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting is proper under 35 U.S.C. § 299 because, as alleged in **COUNT I-II**, Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New

World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting are liable for patent infringement arising out of the same series of transactions or occurrences related to the use of the same method and questions of fact common to all said Defendants will arise in the action.

17. Further, numerous rights to relief are asserted against Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting jointly, severally, or in the alternative with respect to or arising out of the same transaction, occurrence or series of transactions or occurrences relating to the making, using, importing into the United States, offering to sell or selling of the same accused method and/or process and the same Accused Instrumentalities.

18. Each allegation made herein against Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting is made jointly, individually or in the alterative.

19. Said joint, several or alternative liability between Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant

Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting, all jointly participating in a live stream event of the Governor's Town Hall on 4/2/20 and jointly, severally or alternatively implementing as direct infringers, the activities infringing the '735 patent including, respectively, executing a Service Class comprising print() or println() statements of the dump PrintWriter method during a Governor's Town Hall live event on Android TV between 7-8 pm on 4/2/20, each defendant representing at least one local Detroit television station participating in the Governor's Town Hall.

20. Said activities performed jointly, severally or alternatively by Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting include generating via a generator print() or println() statements of the PrintWriter method contained in Service Class predetermined program material and transmitting via joint Android TV means for transmitting program signals program signals representative of Service Class predetermined program material.

21. Said certain activities performed jointly, several or alternatively by Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting further include encoding program signals representative of Service Class predetermined program material to

transmit said print() or println() statements of the PrintWriter method in conjunction with program signals representative of Service Class predetermined program material.

U.S. PATENT RE47,735

22. On November 19, 2019, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. RE47,735 ("735 Patent"), entitled "AUDIO/VIDEO PROGRAM-RELATED HYPERLINK PRINTER", to Progme as assignee after a full and fair Reexamination and Reissue proceeding.

23. As indicated in the appended **EXHIBIT B**, Progme became the owner of all rights, title and interest in and to the '735 Patent after being the Assignee of U.S. Patent No. 8,713,425 by recorded assignment and continuing as said Assignee as well as the Applicant in the Reissue Proceeding at the USPTO in which the reissue of U.S. Patent No. 8,713,425 into the '735 Patent was allowed and further Progme possesses all rights of recovery under the '735 Patent including the right to sue and recover damages for all infringements. Since the date of issue of the '735 Patent on 11/19/19, Progme has been and remains the sole owner of said rights, title and interest in and to the '735 Patent.

24. Progme operates the website PrintHD.TV listing for license for a fee various sets of one or more print() or println() statements of the PrintWriter method covered by the '735 Patent.

25. The '735 Patent discloses and claims, in part, a method deploying timer means for generating an hyperlink address string structured as a PrintWriter method and an apparatus deploying timer means for receiving and processing an hyperlink address string structured as a PrintWriter method, said hyperlink address string structured as a PrintWriter method having an out, writer, pw or ps parameter, for hyperlinking to a resource in the initial array position of a list in which resource identifiers uniquely identifying resources

corresponding to predetermined program material are arrayed printing predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed wherein said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed is defined within at least one print() or println() statement of a PrintWriter method. *See* '735 Patent at 16:12-27 and claims 1, 2, 4, 5-8, 14 and 24.

26. The '735 Patent discloses and claims, in part, said hyperlink address string structured as a PrintWriter method comprising a first attribute indicating a predetermined hyperlink address comprising a resource identifier identifying a resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed and a second attribute indicating one or a plurality of predetermined parameters defining predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed comprising at least one predetermined parameter instructing a PrintWriter to print said predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed. *See* '735 Patent at 3:22-33 and claims 1, 2 and 14.

27. The '735 Patent discloses and claims, in part, said one or a plurality of predetermined parameters defining predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed indicated in said second

attribute of said hyperlink address string comprises a predetermined parameter defining a predetermined value of a predetermined copy control attribute of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed. *See* '735 Patent at 3:65-67-4:1-3 and claims 2 and 11.

28. The '735 Patent discloses and claims, in part, "the first attribute indicating a predetermined hyperlink address to predetermined hyperlinked content may be a resource identifier to identify a resource related to a Java Virtual Machine (JVM) and an application executed in the JVM, … wherein the resource identifier … [is] generated by using Java language, said resource identifier comprises a unique identifier related to an application that is to be executed … and … an identifier of an application to which a resource consumer related to a resource belongs … ." *See* '735 Patent at 21:37-67-22:1-29 and claims 1, 2 and 14.

29. The '735 Patent discloses and claims, in part, said predetermined hyperlink address string comprises a character string and said resource identifier identifying a resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed comprises an URI or URL. *See* '735 Patent at 5:50-67-6:1-19 and 9:20-23, **FIG. 2**, **6A**, **FIG. 3**, **6B** and claims 2 and 3.

30. The '735 Patent discloses and claims, in part, said predetermined hyperlink address indicates http hyperlink means comprising an Http Post or an Http Get value wherein said predetermined hyperlink address may comprise a local storage address or an Internet web

address. *See* '735 Patent at 2:48-50, 5:50-67-6:1-19, 9:19-20, **FIG. 2**, **6A**, **FIG. 3**, **6B** and claims 14, 19 and 20.

31. The '735 Patent discloses and claims, in part, said predetermined hyperlink address indicating http hyperlink means comprising an Http Post or an Http Get value wherein said predetermined hyperlink address may comprise a local storage address or an Internet web address may be defined within at least one print() or println() statement of said PrintWriter method. *See* '735 Patent at 2:48-50, 5:50-67-6:1-19, 9:19-20, **FIG. 2**, **6A**, **FIG. 3**, **6B** and claims 2, 4, 14, 19 and 20.

32. The '735 Patent discloses and claims, in part, said method deploying timer means further for encoding said hyperlink address string structured as a PrintWriter method for transmission in conjunction with program signals representative of said predetermined program material to a receiver for receiving said hyperlink address string structured as a PrintWriter method in conjunction with said program signals representative of said predetermined program material. *See* '735 Patent at 7:66-67-8:1-28, **FIG. 1**, **13 & 14** and claims 2, 13, 14, 15, 16 and 17.

33. The '735 Patent discloses and claims, in part, sending and thus, implicitly, sending to a receiver receiving, said hyperlink address string structured as a PrintWriter method in a class containing at least one print() or println() statement of a PrintWriter method. *See* '735 Patent at 16:12-27 and claims 1, 2 and 14.

34. The '735 Patent discloses and claims, in part, transforming said PrintWriter method from a receiver receiving said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed to a printer printing predetermined printable output of said resource in

the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed according to said second attribute of said hyperlink address string. *See* '735 Patent at claims 1, 2 and 14.

35. The '735 Patent discloses and claims, in part, said hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed comprises hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed defined within at least one print() or println() statement of a PrintWriter method. *See* '735 Patent at 15:51-16:2, 16:12-26, 16:29-67-18:12 and claims 2 and 4.

36. The '735 Patent discloses and claims, in part, said hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed comprises hyperlinking or traversing through a list of one or more print() or println() statements of a PrintWriter method wherein said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material is defined within at least one print() or println() statement of the PrintWriter method. *See* '735 Patent at 7:48-56, 15:51-16:2, 16:12-26, 16:29-67-18-12 and claims 2 and 4.

37. The '735 Patent discloses and claims, in part, said hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed activates said printing said predetermined printable output of said resource in the initial array position of a list in

which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed. *See* '735 Patent at 1:42-48, 11:41-47 and claims 1, 2 and 14.

38. The '735 Patent discloses and claims, in part, said timer means for temporally defining predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed wherein said timer means determines one or a plurality of timing instructions for said hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed timely printing said predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed according to said one or a plurality of predetermined parameters defining predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed indicated in said second attribute of said hyperlink address string wherein said one or a plurality of timing instructions comprise one or a plurality of respective offset values. *See* '735 Patent at 2:59-67-3:1-14, 10:28-43 and claims 2 and 9.

39. The '735 Patent discloses and claims, in part, said receiver for receiving said hyperlink address string structured as a PrintWriter method in conjunction with said program signals representative of said predetermined program material comprises said timer means. *See* '735 Patent at 9:59-61, 10:28-43, **FIG. 1**, **22 & 26** and claims 14 and 18.

40. The '735 Patent discloses and claims, in part, said hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources

corresponding to predetermined program material are arrayed comprises seeking behavior. *See* '735 Patent at 2:50-55, 16:12-26 and claims 2 and 10.

41. The '735 Patent further discloses and claims, in part, predetermined activation of said hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed. *See* '735 Patent at 1:60-67-2:1-5, 6:20-26, 7:24-47, 9:24-47, **FIG. 1**, **30**, **31** and **34** and claims 2, 12, 14, 21 and 22.

42. The '735 Patent discloses and claims, in part, said hyperlinking to said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed prints predetermined printable output of said resource in the initial array position of a list in which resource identifiers uniquely identifying resources corresponding to predetermined program material are arrayed to display on a screen. *See* '735 Patent at 1:42-48, 11:41-47 and claims 1, 2 and 14.

43. The '735 Patent is valid and enforceable.

The Governor's Town Hall

44. On or about 4/2/20, on information and belief, Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting directly infringed at least Claims 2, 4, 6, 7 and 9 of the '735 Patent by invoking certain dump() PrintWriter method in each of the TvInputHardwareManager and TvInputManagerService Service Classes for live

14

transmission of the virtual "Governor's Town Hall" between 7:00 and 8:00 pm on 4/2/20 via Android TV in conjunction with program signals representative of the Governor's Town Hall and committed indirect infringement thererof by encouraging, promoting and instructing on infringing dumpsys access to valuable information concerning the live transmission, by several Detroit local television stations jointly executing the Android TV application and streaming the Governor's Town Hall via their respective local television signals on Android TV and, on information and belief, access (hyperlink to and print) valuable dumpsys information during the live stream. *See* <u>Detroit Television Stations Partner on Virtual 'Governor's Town Hall'</u> @ <u>https://tvnewscheck.com/article/247009/247009/</u>, the ''735 Patent at Claims 2, 4, 6, 7 and 9 and **Defendant Google's Infringing Code Service Class Examples** listed below.

45. On information and belief, said Governor's Town Hall was listed and transmitted as a live event on Android TV pursuant to "a standard API for manufacturers to create input modules for controlling Android TV, and enables live TV search and recommendations via metadata published by the TV Input." *See* <u>https://source.android.com/devices/tv</u>.

46. On information and belief, said Governor's Town Hall was negotiated in a "contract" to be listed and transmitted as a live event on Android TV in advance of any listing or transmission on Android TV, said contract between the respective "TV Provider", e.g. local Detroit television station or broadcast or cable network, and a predetermined Android TV application for such listing and transmission on Android TV wherein said contract defines the basic database of TV content storing channel and program information from TV Inputs including metadata supplying respective local Detroit television station channel and program information for the Governor's Town Hall to be

stored in respective channels and programs tables in rows and columns representing information about the TV channel typically channel number and name in the channels table and data describing the TV program, e.g. the Governor's Town Hall live event, including program title and start time and the TV Provider publishes and manages associated permissions so that TV Inputs "can see only their own records", e.g. the supplied TV channels and programs. *See* https://developer.android.com/reference/android/media/tv/TvContract.

47. On information and belief, Google negotiated such contract with each local Detroit television station participating in the Governor's Town Hall live event in advance of the live event or other predetermined program material for said listing and transmission of the live event on Android TV.

48. On information and belief, said database listing for each participating local Detroit television station included the following database fields populated by TV Inputs: 1) display: containing information that applications want to make visible to the user such as channel number and name and program title; 2) metadata: 3 subfields for identifying content: the channel's transport stream, original network ID and Service ID; 3) internal data: for arbitrary information about the channel or program to be stored and 4)flag: to indicate whether the channel is to be restricted from search, browsing or viewing. *See* https://source.android.com/devices/tv.

TV Input Element in Android TV Contract

49. A key element in negotiating such Android TV contract between TV Provider and Application is the input, provided as "TV Input" or other input, to constitute the predetermined program material to be listed and transmitted via Android TV.

50. In negotiating such Android TV contract on behalf of the Android TV system, Defendant Google is aware of the key importance of said TV Input element or willfully blind of such key importance to a TV Provider in negotiating such Android TV contract.

TvInputHardwareManager and TvInputManagerService

51. TV Provider dumpsys access during the streaming of TV Provider predetermined program material provides critical information on said key TV Input element in the TvInputHardwareManager Service Class comprising 13 print() or println() statements of the dump PrintWriter method wherein said dumpsys access by a TV Provider directly infringes all elements of at least one of Claims 2, 4, 6, 7, 14, 22 and 24 of the '735 Patent while providing predetermined printable output of each of the 13 print() or println() statements of the dump PrintWriter method represented in the chart below.

Println() Statement# of the dump() PrintWriter Method	Predetermined Printable Output
Println() Statement[1]	`"TvInputHardwareManager Info:"`
Println() Statement[2]	`"mConnections: deviceId -> Connection"`
Println() Statement[3]	`deviceId + ": " + mConnection`
Println() Statement[4]	`"mHardwareList:"`
Println() Statement[5]	`tvInputHardwareInfo`
Println() Statement[6]	`"mHdmiDeviceList:"`
Println() Statement[7]	`hdmiDeviceInfo`
Println()Statement[8]	`"mHardwareInputIdMap: deviceId -> inputId"`
Println() Statement[9]	`deviceId + ": " + inputId`
Println() Statement[10]	`"mHdmiInputIdMap: id -> inputId"`

Println() Statement[11]	`id + ": " + inputId`
Println() Statement[12]	`"mInputMap: inputId -> inputInfo"`
Println() Statement[13]	`entry.getKey() + ": " + entry.getValue());.`

See TvInputHardware example in **Defendant Google's Infringing Code Service Class Examples** listed below and '735 Patent at Claims 2, 4, 6, 7, 14, 22 and 24.

52. TV Provider dumpsys access during the streaming of TV Provider predetermined program material provides critical information on said key TV Input element in the TvInputManagerService Service Class comprising 35 print() or println() statements of the dump PrintWriter method wherein said dumpsys access by a TV Provider directly infringes all elements of at least one of Claims 2, 4, 6, 7, 14, 22 and 24 of the '735 Patent while providing predetermined printable output of each of the 35 print() or println() statements of the dump PrintWriter method represented in the chart below.

Println() Statement# of the dump() PrintWriter Method	Predetermined Printable Output
Println() Statement[1]	`"User Ids (Current user: " + mCurrentUserId + "):"`
Println() Statement[2]	`Integer.valueOf(userId)`
Println() Statement[3]	`"UserState (" + userId + "):"`
Println() Statement[4]	`"inputMap: inputId -> TvInputState"`
Println() Statement[5]	`entry.getKey() + ": " + entry.getValue()`
Println() Statement[6]	`"packageSet:"`
Println() Statement[7]	`packageName`

Println() Statement[8]	`"clientStateMap: ITvInputClient -> ClientState"`
Println() Statement[9]	`entry.getKey() + ": " + client`
Println() Statement[10]	`"sessionTokens:"`
Println() Statement[11]	`"" + token`
Println() Statement[12]	`"clientTokens: " + client.clientToken`
Println() Statement[13]	`"userId: " + client.userId`
Println() Statement[14]	`"serviceStateMap: ComponentName -> ServiceState"`
Println() Statement[15]	`entry.getKey() + ": " + service`
Println() Statement[16]	`"sessionTokens:"`
Println() Statement[17]	`"" + token`
Println() Statement[18]	`"service: " + service.service`
Println() Statement[19]	`"callback: " + service.callback`
Println() Statement[20]	`"bound: " + service.bound`
Println() Statement[21]	`"reconnecting: " + service.reconnecting`
Println() Statement[22]	`"sessionStateMap: ITvInputSession -> SessionState"`
Println() Statement[23]	`entry.getKey() + ": " + session`
Println() Statement[24]	`"inputId: " + session.inputId`
Println() Statement[25]	`"client: " + session.client`

Println() Statement[26]	`"seq: " + session.seq`
Println() Statement[27]	`"callingUid: " + session.callingUid`
Println() Statement[28]	`"userId: " + session.userId`
Println() Statement[29]	`"sessionToken: " + session.sessionToken`
Println() Statement[30]	`"session: " + session.session`
Println() Statement[31]	`"logUri: " + session.logUri`
Println() Statement[32]	`"hardwareSessionToken: " + session.hardwareSessionToken`
Println() Statement[33]	`"mCallbacks:"`
Println() Statement[34]	`userState.mCallbacks.getRegisteredCallback Item(j).toString()`
Println() Statement[35]	`"mainSessionToken: " + userState.mainSessionToken`

See TvInputManagerService example in **Defendant Google's Infringing Code Service Class Examples** listed below and '735 Patent at Claims 2, 4, 6, 7, 14, 22 and 24.

Defendants Infringing Code Service Class Examples

53. **Defendants Infringing Code** hyperlink address string structured as a PrintWriter method infringes the '735 Patent in every Service Class in the Android system and/or dumpsys tool containing such a hyperlink address string structured as a PrintWriter method including the TvInputHardwareManager Service Class wherein the file descriptor resource in the initial array position of a list in which file descriptor resource identifiers uniquely identifying file descriptor resources corresponding to TvInputHardwareManager

Service Class predetermined program material is defined within at least one of print() or println() statements[1-13] of the PrintWriter method having a pw parameter.

```
public void dump(FileDescriptor fd, final PrintWriter wri
                ter, String[] args) {

            [1]pw.println("TvInputHardwareManager Info:");

            [2]pw.println("mConnections: deviceId ->
                    Connection");

            [3]pw.println(deviceId + ": " + mConnection);

                [4]pw.println("mHardwareList:");

                [5]pw.println(tvInputHardwareInfo);

                [6]pw.println("mHdmiDeviceList:");

                    [7]pw.println(hdmiDeviceInfo);

            [8]pw.println("mHardwareInputIdMap: deviceId -
                    > inputId");

            [9]pw.println(deviceId + ": " + inputId);

                [10]pw.println("mHdmiInputIdMap: id ->
                    inputId");

                    [11]pw.println(id + ": " + inputId);

                [12]pw.println("mInputMap: inputId ->
                    inputInfo");

                    [13]pw.println(entry.getKey() + ":
                " + entry.getValue());

                        }
```

21

See http://printhd.tv/67-tv-input-service/31-tvinputhardwaremanager citing

https://android.googlesource.com/platform/frameworks/base/+/master/services/core/java/

com/android/server/tv/TvInputHardwareManager.java at lines 552-609.

54. **Defendants Infringing Code** hyperlink address string structured as a PrintWriter method

infringes the '735 Patent in every Service Class in the Android system and/or dumpsys

tool containing such a hyperlink address string structured as a PrintWriter method

including the TvInputManagerService Service Class wherein the file descriptor resource

in the initial array position of a list in which file descriptor resource identifiers uniquely

identifying file descriptor resources corresponding to TvInputManagerService Service

Class predetermined program material is defined within at least one of print() or println()

statements[1-35] of the PrintWriter method having a pw parameter.

```
protected void dump(FileDescriptor fd, final PrintWriter
                writer, String[] args) {

        1pw.println("User Ids (Current user:
             " + mCurrentUserId + "):");

        2pw.println(Integer.valueOf(userId));

        3pw.println("UserState (" + userId + "):");

       4pw.println("inputMap: inputId -> TvInputState");

      5pw.println(entry.getKey() + ": " + entry.getValue());

            6pw.println("packageSet:");

             7pw.println(packageName);
```

```
8pw.println("clientStateMap: ITvInputClient ->
                ClientState");

9pw.println(entry.getKey() + ": " + client);

    10pw.println("sessionTokens:");

        11pw.println("" + token);


12pw.println("clientTokens: " + client.clientToken);

        13println("userId: " + client.userId);

    14pw.println("serviceStateMap: ComponentName ->
                ServiceState");

    15pw.println(entry.getKey() + ": " + service);

        16pw.println("sessionTokens:");

            17pw.println("" + token);

    18pw.println("service: " + service.service);

    19pw.println("callback: " + service.callback);

        20pw.println("bound: " + service.bound);

21pw.println("reconnecting: " + service.reconnecting);

    22pw.println("sessionStateMap: ITvInputSession ->
                SessionState");

    23pw.println(entry.getKey() + ": " + session);

    24pw.println("inputId: " + session.inputId);

        25pw.println("client: " + session.client);
```

23

```
26 pw.println("seq: " + session.seq);

27 pw.println("callingUid: " + session.callingUid);

28 pw.println("userId: " + session.userId);

29 pw.println("sessionToken: " + session.sessionToken);

30 pw.println("session: " + session.session);

31 pw.println("logUri: " + session.logUri);

32 pw.println("hardwareSessionToken:
   " + session.hardwareSessionToken);

33 pw.println("mCallbacks:");

34 pw.println(userState.mCallbacks.getRe
   gisteredCallbackItem(j).toString());

35 pw.println("mainSessionToken:
   " + userState.mainSessionToken);

}
```

See http://printhd.tv/67-tv-input-service/32-tvinputmanagerservice citing

https://android.googlesource.com/platform/frameworks/base/+/master/services/core/java/

com/android/server/tv/TvInputManagerService.java at lines 2007-2123.

COUNT I: Defendant Fox Broadcasting, Defendant Fox Television Stations,

Defendant Fox News, Defendant New World Communications, Defendant Graham

Media Group Michigan, Defendant Graham Media Group, Defendant Scripps

Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and

Defendant Adell Broadcasting's

INFRINGEMENT OF U.S. PATENT RE47,735

55. Progme re-alleges paragraphs 1-54 as if fully set forth herein.

56. At least since Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting received service of this Complaint, the service of the original Complaint for Patent Infringement against Defendant Twenty-First Century Fox, Defendant Fox News, Defendant Fox Broadcasting, Defendant Fox Networks and Defendant Fox Entertainment on 4/3/18 and/or service of the First Amended Complaint for Patent Infringement on 4/13/20, Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting have each had knowledge of the '735 Patent-in-suit or has been willfully blind to the existence of the '735 Patent-in-suit.

57. On information and belief, Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting each continue to infringe the '735 Patent after being made aware of the existence and infringement of the '735 Patent at least from actual notice from service of this Complaint, the service of the original Complaint for Patent Infringement

against Defendant Twenty-First Century Fox, Defendant Fox News, Defendant Fox Broadcasting, Defendant Fox Networks and Defendant Fox Entertainment on 4/3/18 and/or service of the First Amended Complaint for Patent Infringement on 4/13/20.

58. On or about 4/2/20, Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications (WJBKD-TV), Defendant Graham Media Group Michigan, Defendant Graham Media Group (WDIV-TV), Defendant Scripps Broadcasting, Defendant Scripps Media (WXYZ-TV & WMYD-TV), Defendant WKBD-TV, Defendant CBS (WKBD-TV & WWJ-TV) and Defendant Adell Broadcasting (WADL-TV), on behalf of respective local Detroit television stations, participated in a joint Governor's Town Hall live stream on Android TV wherein, on information and belief, said defendants each invoked via the Android TV dumpsys tool said certain dump() PrintWriter method specified above in at least one of the Android TV Service Classes TvInputHardwareManager and TvInputManagerService and thereby directly infringed at least one of Claims 2, 4, 6, 7 ,9 , 14 ,22 and 24 of the '735 Patent.

COUNT II: Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's

INFRINGEMENT OF U.S. PATENT RE47,735

59. Plaintiff re-alleges paragraphs 1-58 as if fully set forth herein.

60. At least since Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group

Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting each received service of this complaint, the service of the original Complaint for Patent Infringement against Defendant Twenty-First Century Fox, Defendant Fox News, Defendant Fox Broadcasting, Defendant Fox Networks and Defendant Fox Entertainment on 4/3/18 and/or service of the First Amended Complaint for Patent Infringement on 4/13/20, each has had knowledge of the '735 Patent-in-suit or has been willfully blind to the existence of the '735 Patent-in-suit.

61. On information and belief, Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting each continued to infringe the '735 Patent after being made aware of the existence of the '735 Patent from actual notice from said service of this complaint, the service of the original Complaint for Patent Infringement against Defendant Google on 4/3/18 and/or service of the First Amended Complaint for Patent Infringement on 4/13/20,.

62. On information and belief, Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting has each directly infringed one or more of claims 14-25 of the '735 Patent by making, using (including using for testing, debugging and diagnosis

purposes), importing, offering for sale and/or selling within the United States the Accused Streaming Platform Instrumentalities in violation of 35 U.S.C. § 271(a).

63. Said Accused Streaming Platform Instrumentalities for Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting comprise the respective local television station streaming platform: Defendant Fox Broadcasting, Defendant Fox Television Stations and Defendant New World Communications: WJBKD-TV streaming platform; Defendant Graham Media Group Michigan and Defendant Graham Media Group: WDIV-TV streaming platform; Defendant Scripps Broadcasting and Defendant Scripps Media: WXYZ-TV streaming platform & WMYD-TV streaming platform; Defendant WKBD-TV and Defendant CBS: WKBD-TV streaming platform & WWJ-TV streaming platform and Defendant Adell Broadcasting: WADL-TV streaming platform.

64. Said Accused Streaming Platform Instrumentalities for Defendant Fox News comprise the Fox NOW streaming platform including TV Everywhere.RTM and specifically generating, encoding, receiving and processing a Fox News Android application for distributing program signals comprising, *inter alia*, Fox News, Fox Live, Fox Weather and Fox News Alerts.

65. Said Accused Streaming Platform Instrumentalities deploy a virtual machine enabling said Android Runtime to perform the receiving and processing functions claimed in the '735 Patent.

66. Said Accused Streaming Platform Instrumentalities include the receiving apparatus disclosed and claimed in the '735 Patent comprising virtual machine functionality designed to receive and process as claimed therein said dump() method and at least one print() or println() statement of the PrintWriter method.

RELIEF WARRANTED FOR INFRINGEMENT OF U.S. PATENT RE47,735

67. Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's respective infringing activity alleged above comprises the compelling reason Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's respective product or service offering is acquired in the marketplace.

68. Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's respective infringing activity alleged above creates a performance advantage that drives demand for Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant

Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's respective product or service offering.

69. Progme has no adequate remedy at law against Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's acts of infringement and, unless Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting is each enjoined from continuing to infringe the '735 Patent, Progme will suffer irreparable harm. Indeed, the hardships that would be imposed upon Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting by an injunction are relatively less than those faced by Plaintiff Progme should an injunction not issue. Finally, the public interest would be served by issuance of an injunction.

70. Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting each

has had prior constructive notice by marking of the '735 Patent as indicated in **Exhibit C**, the patent number "**Patent No. 8,713,425**" (Original)/"**Patent No. RE47,735**" (Reissue) marked on the PrintHD.TV home page (located at www.printhd.tv) web page, labelling at the bottom of the page on 5/27/14, to provide constructive notice thereof pursuant to 35 U.S.C. § 287. *See* 35 U.S.C. § 252.

71. Progme has at all times complied with 35 U.S.C. § 287, providing Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting with prior constructive notice, which constituted consistent and continuous notice of the '735 Patent being infringed to Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting. *See* 35 U.S.C. § 252.

72. The method of generating and encoding the hyperlink address string structured as a PrintWriter method claimed in the '735 Patent and alleged infringed herein is capable of being produced in a physical device, a web page, and has been and is noticed in said web page for constructive notice by marking pursuant to 35 U.S.C. § 287.

73. Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps

Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting has received actual notice of the '735 Patent and Defendants' respective infringement thereof from service of this Complaint, the service of the original Complaint for Patent Infringement against Defendant Twenty-First Century Fox, Defendant Fox News, Defendant Fox Broadcasting, Defendant Fox Networks and Defendant Fox Entertainment on 4/3/18 and/or service of the First Amended Complaint for Patent Infringement on 4/13/20.

74. As a result of Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's respective acts of infringement, Progme has suffered and will continue to suffer damages in an amount to be proved at trial. Pursuant to 35 U.S.C § 284, Progme is entitled to adequate damages to compensate for infringement including a reasonable royalty from the date of Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's notice of the '735 Patent. Progme has no means of ascertaining the full extent of Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell

Broadcasting's infringement of the '735 Patent and the amount of Progme's damages

resulting from said infringement except through the production of evidence thereof in

Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News,

Defendant New World Communications, Defendant Graham Media Group Michigan,

Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps

Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's sole

possession and control.

PRAYER FOR RELIEF

75. WHEREFORE, Progme prays for the following relief:

76. A judgment in favor of Progme that

    a.   Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant

        Fox News, Defendant New World Communications, Defendant Graham

        Media Group Michigan, Defendant Graham Media Group, Defendant Scripps

        Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant

        CBS and Defendant Adell Broadcasting each has infringed, directly, literally

        and/or under the doctrine of equivalents, at least one claim of the '735 Patent;

    b.   a permanent injunction enjoining Defendant Fox Broadcasting, Defendant Fox

        Television Stations, Defendant Fox News, Defendant New World

        Communications, Defendant Graham Media Group Michigan, Defendant

        Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps

        Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell

        Broadcasting and their respective officers, directors, agents, servants,

        employees, affiliates, divisions, branches, subsidiaries, parents, and all others

acting in concert or privity with any of them from continuing to infringe the '735 Patent including from continuing to make, use, sell and/or offer for sale in the United States or import into the United States the Android SDK, Android applications, Android dumpsys tool, Android devices and streaming platforms;

c. award to Progme the damages to which it is entitled by law and under 35 U.S.C. § 284 for Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting's past infringement and any continuing or future infringement up until the date Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV, Defendant CBS and Defendant Adell Broadcasting each is finally and permanently enjoined from further infringement, including both compensatory damages and treble damages for willful infringement;

d. a finding that this is an "exceptional action" and a judgment and order requiring Defendant Fox Broadcasting, Defendant Fox Television Stations, Defendant Fox News, Defendant New World Communications, Defendant Graham Media Group Michigan, Defendant Graham Media Group, Defendant

34

Scripps Broadcasting, Defendant Scripps Media, Defendant WKBD-TV,

Defendant CBS and Defendant Adell Broadcasting to pay the costs of this

action (including all disbursements) as well as attorneys' fees as provided by

35 U.S.C. § 285;

e.   award to Progme pre-judgment and post-judgment interest on its damages and

f.   such other further relief in law or equity to which Progme may be justly

entitled.

DEMAND FOR JURY TRIAL

77. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Progme hereby demands a

trial by jury as to all issues so triable.

Dated: June 8, 2020

Respectfully submitted,

/s/ Michael T. Raggio
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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2020, I electronically filed the

foregoing paper with the Clerk of Court using the ECF system which will send

notification of such filing to all counsel of record.

Signed,

/s/ Michael T. Raggio
Michael T. Raggio