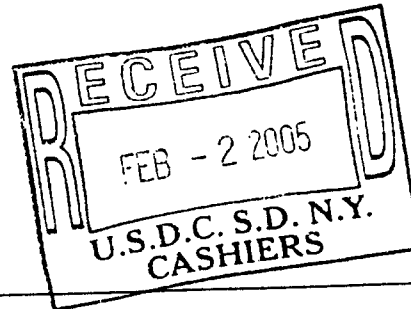


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KENNETH RUBENSTEIN  
 NANCY KILSON  
 PROSKAUER ROSE LLP  
 1585 Broadway  
 New York, NY 10036-8299  
 Telephone: (212) 969-3000

Attorneys for SkyStream Networks, Inc.



IN THE UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF NEW YORK

**05 CV 1155**

SKYSTREAM NETWORKS, INC.,

Plaintiff,

v.

PFIZER, INC. and HELIUS, INC.

Defendants.

COMPLAINT

JURY DEMANDED

SkyStream Networks, Inc. ("SkyStream"), by its attorneys, and for its complaint alleges as follows:

The Parties

1. Plaintiff SkyStream is a Delaware corporation in good standing, with a principal place of business located at 455 DeGuigne Drive, Sunnyvale, California. SkyStream is engaged in, among other things, the manufacture and sale of multimedia delivery platforms, including the Edge Media Router family of products.

2. On information and belief, Defendant Pfizer, Inc. ("Pfizer") is a Delaware corporation with a principal place of business located in New York, New York.

3. On information and belief, Defendant Heliuss, Inc. ("Heliuss") is a Utah corporation with a principal place of business located in Lindon, Utah.

Jurisdiction and Venue

4. This action arises under the Patent laws of the United States, Title 35, United States Code, including without limitation 35 U.S.C. §§ 271(a), (b), (c), (f) and 281.

5. This Court has subject matter jurisdiction over these claims under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant Heliuss because, inter alia, Heliuss has offered for sale and/or sold infringing products, including without limitation its MediaGate family of products, in this District, and has been inducing the infringing use of infringing products in this District.

7. This Court has personal jurisdiction over Defendant Pfizer because, inter alia, Pfizer has used infringing products, including without limitation Heliuss' MediaGate family of products, in this District, and because Pfizer resides in this District.

8. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1391 and 1400(b).

Count One  
(Patent Infringement Against Heliuss and Pfizer)

9. SkyStream repeats and realleges the allegations of paragraphs 1 through 8 as if fully set forth herein.

10. SkyStream is the owner by assignment of all title and interest to United States Patent No. 6,831,892 B1 entitled "Network distributed remultiplexer for video program bearing transport

streams” (the “‘892 Patent”). The patent issued on December 14, 2004. A copy of the ‘892 Patent is annexed hereto as Exhibit A.

11. Helius has been and still is directly and contributorily infringing the ‘892 Patent in this judicial district and elsewhere by making, using, selling and offering for sale infringing products including, *inter alia*, the MediaGate family of products. Also, Helius has been actively inducing infringement of the ‘892 patent by making, using, selling and offering for sale products including, *inter alia*, the MediaGate family of products, as well as encouraging use of those products in an infringing manner.

12. On information and belief, Helius’s infringement of the ‘892 Patent is willful, wanton and deliberate, without license, and with full knowledge of SkyStream’s rights.

13. Pfizer has been and still is directly and contributorily infringing the ‘892 Patent in this judicial district and elsewhere by using infringing products including, *inter alia*, Helius’ MediaGate family of products.

14. On information and belief, Pfizer’s infringement of the ‘892 Patent is willful, wanton and deliberate, without license, and with full knowledge of SkyStream’s rights.

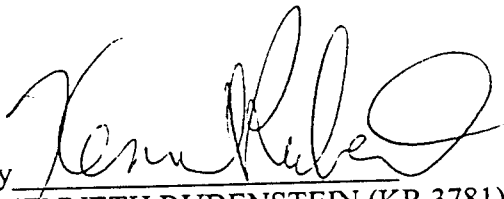
15. Unless restrained and enjoined by this Court, Helius and Pfizer will continue their acts of infringement and the resulting damages to SkyStream shall be substantial, continuing and irreparable.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff SkyStream prays that the Court:

- A. Permanently restrain and enjoin Heliuss, Pfizer, and all agents, servants, employees, attorneys, directors, successors, assigns and all persons in active concert or participation with Heliuss or Pfizer from further infringement of the '892 Patent;
- B. Order that Heliuss and Pfizer pay SkyStream damages in an amount adequate to compensate SkyStream for Heliuss' and Pfizer's infringement of the '892 Patent;
- C. Increase said damages to three times the amount found or assessed;
- D. Find this case to be exceptional and award SkyStream its attorneys fees and expenses under 35 U.S.C. § 285; and
- E. Order such other and further relief as the Court deems just and proper.

Dated: January 19, 2005

By   
KENNETH RUBENSTEIN (KR 3781)  
NANCY KILSON (NK 4557)  
PROSKAUER ROSE LLP  
1585 Broadway  
New York, New York 10036  
(212) 969-3000

*Counsel for SkyStream Networks, Inc.*