

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. _____

RECOGNICORP, LLC,
a Texas limited liability company,

Plaintiff,

v.

LIBERTY MEDIA CORPORATION,
a Delaware corporation,
STARZ ENTERTAINMENT, LLC,
a Colorado limited liability company,
STARZ MEDIA, LLC,
a Delaware limited liability company,
STARZ, LLC,
a Delaware limited liability company, and
MANGA ENTERTAINMENT, LLC,
a Delaware limited liability company,

Defendants.

COMPLAINT AND JURY DEMAND

Plaintiff Recognicorp, LLC ("Recognicorp" or "Plaintiff"), for its Complaint against defendants Liberty Media Corporation ("Liberty Media"), Starz Entertainment, LLC ("Starz Entertainment"), Starz Media, LLC ("Starz Media"), Starz, LLC ("Starz LLC"), and Manga Entertainment, LLC ("Manga Entertainment") (collectively, "Defendants"), alleges the following:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 1, *et seq.*

THE PARTIES

2. Plaintiff Recognicorp is a limited liability company organized under the laws of the State of Texas with its principal place of business at 106 Fannin Avenue East, Round Rock, Texas 78664-5219.

3. On information and belief, Defendant Liberty Media Corporation is a corporation organized under the laws of Delaware with its principal place of business at 12300 Liberty Boulevard, Englewood, Colorado 80112.

4. On information and belief, Defendant Starz Entertainment, LLC is a limited liability company organized under the laws of Colorado with its principal place of business at 8900 Liberty Circle, Englewood, Colorado 80112. On information and belief, Defendant Starz Entertainment, LLC operates as a subsidiary of Defendant Starz, LLC.

5. On information and belief, Defendant Starz Media, LLC is a limited liability company organized under the laws of Delaware with its principal place of business at 12300 Liberty Boulevard, Englewood, Colorado 80112. On information and belief, Defendant Starz Media, LLC operates as a subsidiary of Defendant Starz, LLC.

6. On information and belief, Defendant Starz, LLC is a limited liability company organized under the laws of Delaware with its principal place of business at 8900 Liberty Circle, Englewood, CO 80112. On information and belief, Defendant Starz, LLC operates as a subsidiary of Defendant Liberty Media Corporation.

7. On information and belief, Manga Entertainment, LLC is a limited liability company organized under the laws of Delaware with its principal place of business at 12300 Liberty Boulevard, Englewood, Colorado 80112. On information and belief, Defendant Manga Entertainment, LLC operates as a subsidiary of Defendant Starz Media, LLC.

JURISDICTION AND VENUE

8. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

9. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

10. Liberty Media is subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, Liberty Media has purposefully availed itself of the privilege of conducting business within this Judicial District; has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being haled into court in the District; has purposefully directed activities at residents of this State; and at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities.

11. Starz Entertainment is subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, Starz Entertainment has purposefully availed itself of the privilege of conducting business within this Judicial District; has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being haled into court in the District; has purposefully

directed activities at residents of this State; and at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities.

12. Starz Media is subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, Starz Media has purposefully availed itself of the privilege of conducting business within this Judicial District; has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being haled into court in the District; has purposefully directed activities at residents of this State; and at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities.

13. Starz LLC is subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, Starz LLC has purposefully availed itself of the privilege of conducting business within this Judicial District; has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being haled into court in the District; has purposefully directed activities at residents of this State; and at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities.

14. Manga Entertainment is subject to the jurisdiction of this Court by reason of its acts of patent infringement which have been committed in this Judicial District, and by virtue of its regularly conducted and systematic business contacts in this State. As such, Manga Entertainment has purposefully availed itself of the privilege of conducting business within this

Judicial District; has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being haled into court in the District; has purposefully directed activities at residents of this State; and at least a portion of the patent infringement claims alleged herein arise out of or are related to one or more of the foregoing activities.

15. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b)-(c) and 1400(b).

COUNT I
(Infringement of U.S. Patent No. 8,005,303)

16. The allegations set forth in all of the foregoing paragraphs are incorporated into this Count I as though fully set forth herein.

17. On August 23, 2011, United States Patent No. 8,005,303 (the "'303 Patent"), entitled "Method and Apparatus for Encoding/Decoding Image Data," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '303 Patent is attached as Exhibit A to this Complaint.

18. Recognicorp is the assignee and owner of the right, title and interest in and to the '303 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

19. Upon information and belief, in violation of 35 U.S.C. § 271(a), each of the Defendants has directly infringed, and continues to directly infringe, including under the doctrine of equivalents, the '303 Patent by making, using, importing, selling, and/or offering for sale in the United States, including within this judicial district, composite image customization products that infringe one or more claims of the '303 Patent ("Accused Services and Products"), without the authority of Recognicorp.

20. The Accused Services and Products include, but are not limited to, Manga Avatar Maker. Infringing aspects of the Manga Avatar Maker software include, for example, the instructions to permit a selected facial feature image, such as eyes, to be incorporated into a composite image, and instructions for modifying the selected facial feature image that has been incorporated into the composite image.

21. Recognicorp has been harmed by Defendants' infringing activities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Recognicorp demands judgment for itself and against each Defendant as follows:

- A. An adjudication that each Defendant has infringed the '303 Patent;
- B. An award of damages to be paid by each Defendant and/or Defendants collectively, adequate to compensate Recognicorp for its past infringement of the '303 Patent, and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- C. An injunction ordering each Defendant, and/or Defendants collectively, to pay an ongoing royalty in an amount to be determined for any continued infringement after the date judgment is entered;
- D. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees; and
- E. An award to Recognicorp of such further relief at law or in equity as the Court deems just and proper.

JURY DEMAND

Recognicorp demands a trial by jury on all issues triable as such.

Dated: July 9, 2012

Respectfully submitted,

s/ David B. Kellis
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**ATTORNEYS FOR PLAINTIFF
RECOGNICORP, LLC**