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Attorneys for Plaintiff
ROVI GUIDES, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ROVI GUIDES, INC.,)	Case No.
Plaintiff,)	
v.)	
)	Judge:
COMCAST CORPORATION; COMCAST)	
CABLE COMMUNICATIONS, LLC;)	COMPLAINT FOR PATENT
COMCAST CABLE)	INFRINGEMENT
COMMUNICATIONS MANAGEMENT,)	
LLC; COMCAST BUSINESS)	DEMAND FOR JURY TRIAL
COMMUNICATIONS, LLC; COMCAST)	
HOLDINGS CORPORATION;)	
COMCAST SHARED SERVICES, LLC;)	
COMCAST OF SANTA MARIA, LLC;)	
and COMCAST OF LOMPOC, LLC,)	
Defendants.)	

1 Plaintiff Rovi Guides, Inc. (Rovi) brings this Complaint for patent
2 infringement against Comcast Corporation; Comcast Cable Communications, LLC;
3 Comcast Cable Communications Management, LLC; Comcast Business
4 Communications, LLC; Comcast Holdings Corporation; Comcast Shared Services,
5 LLC; Comcast of Santa Maria, LLC; Comcast of Lompoc, LLC (collectively,
6 Comcast or Defendants) for infringement of U.S. Patent Nos. 8,001,564 (the '564
7 Patent); 7,779,445 (the '445 Patent); 7,386,871 (the '871 Patent); 8,156,528 (the
8 '528 Patent); and 7,301,900 (the '900 Patent); 7,200,855 (the '855 Patent)
9 (collectively, the Asserted Patents). Rovi, on personal knowledge as to its own acts,
10 and upon information and belief as to all others based on investigation, alleges as
11 follows:

12 **SUMMARY OF THE ACTION**

13 1. For over a decade, Comcast built its interactive cable video business on
14 the back of Rovi's patented technology. Specifically, in 2004, when Rovi's U.S.
15 patent portfolio was less than half the size it is today, Comcast paid Rovi over \$250
16 million for a fixed-term license to Rovi's patent portfolio (the License) to use Rovi's
17 technology in connection with Comcast's Pay-TV systems. Comcast was not alone
18 in recognizing the validity and value of Rovi's patents—every other major Pay-TV
19 provider in the U.S. licensed Rovi's patents on similar terms.

20 2. The License expired on March 31, 2016. Yet when Comcast's major
21 Pay-TV competitors—including AT&T, Charter, DISH, and Verizon—faced similar
22 license expirations, Comcast's competitors renewed their licenses with Rovi, re-
23 affirming the value of Rovi's patents. As part of Rovi's negotiations with Comcast,
24 Rovi offered to renew the License on terms similar to what Rovi offered these
25 competitors. Rovi also provided Comcast notice of infringement of many patents,
26 including at least one of the Asserted Patents. Rovi explained that, without renewing
27 the License, Comcast would no longer have permission to use Rovi's patents.

1 privity with, and all persons in active concert or participation with, any of the
2 foregoing, from continued acts of infringement, contributing to infringement, or
3 inducing infringement of the Asserted Patents in this litigation;

4 202. A judgment requiring Comcast to make an accounting of damages
5 resulting from Comcast's infringement of the Asserted Patents in this litigation;

6 203. A judgment awarding Rovi its damages resulting from Comcast's
7 infringement of the Asserted Patents in this litigation, and increasing such damages
8 pursuant to 35 U.S.C. § 284 because of the willful and deliberate nature of
9 Comcast's conduct;

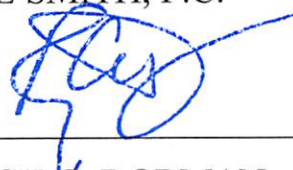
10 204. A judgment requiring Comcast to pay Rovi costs, expenses, and pre-
11 judgment and post-judgment interest for Comcast's infringement of each of the
12 Asserted Patents in this litigation;

13 205. A judgment finding that this is an exceptional case and awarding Rovi's
14 attorneys' fees pursuant to 35 U.S.C. § 285; and

15 206. Such other relief as the Court deems just and proper.
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1 DATED: April 22, 2019

Respectfully submitted,
MCKOOL SMITH, P.C.

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4 BY 
5 RODERICK G. DORMAN
6 ATTORNEYS FOR PLAINTIFF
7 ROVI GUIDES, INC.
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DEMAND FOR JURY TRIAL

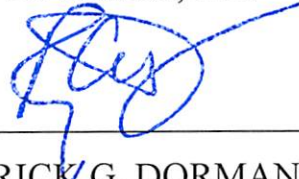
In accordance with Rule 38 of the Federal Rules of Civil Procedure and Local Rule CV-38-1, Plaintiff respectfully demands a jury trial of all issues triable to a jury.

DATED: April 22, 2019

Respectfully submitted,

MCKOOL SMITH, P.C.

BY



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