

FILED

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

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U.S. DISTRICT COURT  
ALEXANDRIA, VIRGINIA

GLOBAL TEL\*LINK CORPORATION,

Plaintiff,

v.

SECURUS TECHNOLOGIES, INC.,

Defendant.

Civil Action No. 3:13CV7B-JRS

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

**GLOBAL TEL\*LINK CORPORATION'S  
COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Global Tel\*Link Corporation ("GTL") files the following Complaint for Patent Infringement and, in support thereof, alleges as follows:

**PARTIES**

1. Plaintiff GTL is a Delaware corporation with its principal place of business at 12021 Sunset Hills Road, Suite 100, Reston, VA 20190. GTL is the owner of each of the patents involved in this action.

2. Defendant Securus Technologies, Inc. ("Securus") is a Delaware corporation with its principal place of business at 14651 Dallas Parkway, Suite 600, Dallas, TX 75254.

**JURISDICTION AND VENUE**

3. This action for patent infringement arises under the patent laws of the United States, including 35 U.S.C. § 271.

4. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Securus. Securus provides telephone, video, data, and other communications services to correctional facilities in Virginia; maintains a registered agent in Virginia; and has systematic and continuous contacts with the forum. On information and belief, Securus regularly solicits business from and conducts business with customers in this District, including for example the Virginia Department of Corrections.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(c) and 1400.

### **GENERAL ALLEGATIONS**

7. GTL is an innovative provider of communications and related services to correctional facilities. GTL's success is the result of its technical expertise, operational experience, innovative solutions, and a commitment to investment in product development. GTL's innovative contributions have been recognized by the U.S. Patent and Trademark Office ("PTO") through the issuance of various U.S. patents.

8. GTL offers integrated telecommunications solutions to solve the business problems in the corrections industry. GTL's state-of-the-art technology includes call controls and live monitoring and recording of inmate conversations, intelligence gathering and data correlation capability, video visitation, and many other features. GTL's products include the LazerNet, LazerPhone, ICMV, and HMP Focus platforms.

9. U.S. Patent No. 7,551,732 ("the '732 patent"), entitled "Centralized Voice over IP Recording and Retrieval Method and Apparatus," was duly and legally issued by the PTO on June 23, 2009. A true and correct copy of the '732 patent is attached hereto as Exhibit A.

10. U.S. Patent No. 7,783,021 ("the '021 patent"), entitled "Digital Telecommunications Call Management and Monitoring System," was duly and legally issued by

the PTO on August 24, 2010. A true and correct copy of the '021 patent is attached hereto as Exhibit B.

11. U.S. Patent No. 8,509,736 (“the '736 patent”), entitled “Telecommunication Call Management and Monitoring System with Voiceprint Verification,” was duly and legally issued by the PTO on August 13, 2013. A true and correct copy of the '736 patent is attached hereto as Exhibit C.

12. U.S. Patent No. 7,853,243 (“the '243 patent”), entitled “Telecommunication Call Management and Monitoring System,” was duly and legally issued by the PTO on December 14, 2010. A true and correct copy of the '243 patent is attached hereto as Exhibit D.

13. Securus makes, uses, sells, or offers to sell specialized telecommunications systems and/or services for correctional institutions in competition with GTL. As further alleged in the paragraphs below, Defendant Securus has infringed and continues to infringe the '732, '021, '736, '243 patents (collectively, the “Asserted GTL Patents”).

**COUNT I**  
**(INFRINGEMENT OF U.S. PATENT NO. 7,551,732)**

14. GTL realleges and incorporates by reference paragraphs 1 through 13 of this Complaint as though set forth in full herein.

15. GTL is the sole owner of the entire right, title, and interest in the '732 patent, including the right to bring suit and recover damages for past infringement.

16. Securus has been aware of the '732 patent since at least the date of this Complaint.

17. Securus has directly infringed one or more claims of the '732 patent in violation of 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States products and services, including its inmate

telephone system and inmate telephone services, and other inmate correctional facility related services, including but not limited to its Secure Call Platform™ (“SCP”) and features thereof (including but not limited to the Secure Connect Network™) (collectively, the “Securus Call Management Products and Services”).

18. On information and belief, Securus has induced and continues to induce others to infringe one or more claims of the ’732 patent in violation of 35 U.S.C. § 271(b) by, with specific intent or willful blindness, actively aiding and abetting others to directly infringe the ’732 patent, including without limitation by: (1) performing the steps of the method claims in connection with the Securus Call Management Products and Services; (2) using the Securus Call Management Products and Services; and (3) combining the Securus Call Management Products and Services with each other and with other components, such as third party software, to make and use the claimed inventions in the United States. These other entities include Securus’s customers and end users of the Securus Call Management Products and Services, including, but not limited to, correctional facilities. Securus actively induces these other entities to engage in these actions by responding to correctional facilities’ requests for proposals, such as Securus’s response, dated January 17, 2013, to the request for proposal issued by Clay County, Florida; by advertising, offering for sale, and selling the Securus Call Management Products and Services; by configuring the Securus Call Management Products and Services so that they will result in infringement when employed for their intended use; and by providing user manuals, product documentation, and other instructions regarding the use of and promotional materials to practice the patented invention. On information and belief, at least from the date of this Complaint forward, Securus’s continued engagement in such actions is with specific intent to cause

infringement or with willful blindness to the resulting infringement because Securus has actual knowledge of the '732 patent and that its acts are inducing infringement of the '732 patent.

19. Such infringement has injured and damaged GTL, and continues to do so.

20. To the extent that facts learned during the pendency of this case show that Securus's infringement of the '732 patent is willful and deliberate, GTL reserves the right to amend this Complaint and request a finding of willful infringement and seek appropriate relief at the time of trial.

21. On information and belief, Securus will continue to infringe the '732 patent unless enjoined by this Court.

**COUNT II**  
**(INFRINGEMENT OF U.S. PATENT NO. 7,783,021)**

22. GTL realleges and incorporates by reference paragraphs 1 through 13 of this Complaint as though set forth in full herein.

23. GTL is the sole owner of the entire right, title, and interest in the '021 patent, including the right to bring suit and recover damages for past infringement.

24. Securus has been aware of the '021 patent since at least the date of this Complaint.

25. Securus has directly infringed one or more claims of the '021 patent in violation of 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States the Securus Call Management Products and Services, including, but not limited to, the SCP.

26. On information and belief, Securus has induced and continues to induce others to infringe one or more claims of the '021 patent in violation of 35 U.S.C. § 271(b) by, with specific intent or willful blindness, actively aiding and abetting others to directly infringe the

'021 patent, including without limitation by: (1) performing the steps of the method claims in connection with the Securus Call Management Products and Services; (2) using the Securus Call Management Products and Services; and (3) combining the Securus Call Management Products and Services with each other and with other components, such as third party software, to make and use the claimed inventions in the United States. These other entities include Securus's customers and end users of the Securus Call Management Products and Services, including, but not limited to, correctional facilities. Securus actively induces these other entities to engage in these actions by responding to correctional facilities' requests for proposals, such as Securus's response, dated January 17, 2013, to the request for proposal issued by Clay County, Florida; by advertising, offering for sale, and selling the Securus Call Management Products and Services; by configuring the Securus Call Management Products and Services so that they will result in infringement when employed for their intended use; and by providing user manuals, product documentation, and other instructions regarding the use of and promotional materials to practice the patented invention. On information and belief, at least from the date of this Complaint forward, Securus's continued engagement in such actions is with specific intent to cause infringement or with willful blindness to the resulting infringement because Securus has actual knowledge of the '021 patent and that its acts are inducing infringement of the '021 patent.

27. Such infringement has injured and damaged GTL, and continues to do so.

28. To the extent that facts learned during the pendency of this case show that Securus's infringement of the '021 patent is willful and deliberate, GTL reserves the right to amend this Complaint and request a finding of willful infringement and seek appropriate relief at the time of trial.

29. On information and belief, Securus will continue to infringe the '021 patent unless enjoined by this Court.

**COUNT III**  
**(INFRINGEMENT OF U.S. PATENT NO. 8,509,736)**

30. GTL realleges and incorporates by reference paragraphs 1 through 13 of this Complaint as though set forth in full herein.

31. GTL is the sole owner of the entire right, title, and interest in the '736 patent, including the right to bring suit and recover damages for past infringement.

32. Securus has been aware of the '736 patent since at least the date of this Complaint.

33. Securus has directly infringed one or more claims of the '736 patent in violation of 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States products and services, including its inmate telephone system and inmate telephone services, and other inmate correctional facility related services, including but not limited to the SCP and features thereof (including but not limited to Continuous Voice Verification, Investigator Pro, Echo, and Voice Biometrics) (collectively, the "Securus Voice Verification Products and Services").

34. On information and belief, Securus has induced and continues to induce others to infringe one or more claims of the '736 patent in violation of 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to engage in the following actions that constitute direct infringement: (1) performing the steps of the method claims in connection with the Securus Voice Verification Products and Services; (2) using the Securus Voice Verification Products and Services; and (3) combining the Securus Voice Verification Products and Services with each other and with other components, such as

third party software, to make and use the claimed inventions in the United States. These other entities include Securus's customers and end users of the Securus Voice Verification Products and Services, including, but not limited to, correctional facilities. Securus actively induces these other entities to engage in these actions by responding to correctional facilities' requests for proposals, such as Securus's response, dated July 9, 2012, to the request for proposal issued by Collin County, Texas; by advertising, offering for sale, and selling the Securus Voice Verification Products and Services; by configuring the Securus Voice Verification Products and Services so that they will result in infringement when employed for their intended use; and by providing user manuals, product documentation, and other instructions regarding the use of and promotional materials to practice the patented invention. On information and belief, at least from the date of this Complaint forward, Securus's continued engagement in such actions is with specific intent to cause infringement or with willful blindness to the resulting infringement because Securus has actual knowledge of the '736 patent and that its acts are inducing infringement of the '736 patent.

35. Such infringement has injured and damaged GTL, and continues to do so.

36. To the extent that facts learned during the pendency of this case show that Securus's infringement of the '736 patent is willful and deliberate, GTL reserves the right to amend this Complaint and request a finding of willful infringement and seek appropriate relief at the time of trial.

37. On information and belief, Securus will continue to infringe the '736 patent unless enjoined by this Court.



**COUNT IV**  
**(INFRINGEMENT OF U.S. PATENT NO. 7,853,243)**

38. GTL realleges and incorporates by reference paragraphs 1 through 13 of this Complaint as though set forth in full herein.

39. GTL is the sole owner of the entire right, title, and interest in the '243 patent, including the right to bring suit and recover damages for past infringement.

40. Securus has been aware of the '243 patent since at least the date of this Complaint.

41. Securus has directly infringed one or more claims of the '243 patent in violation of 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States the Securus Voice Verification Products and Services, including, but not limited to, the SCP.

42. On information and belief, Securus has induced and continues to induce others to infringe one or more claims of the '243 patent in violation of 35 U.S.C. § 271(b) by with specific intent or willful blindness, actively aiding and abetting others to directly infringe the '243 patent, including without limitation by: (1) performing the steps of the method claims in connection with the Securus Voice Verification Products and Services; (2) using the Securus Voice Verification Products and Services; and (3) combining the Securus Voice Verification Products and Services with each other and with other components, such as third party software, to make and use the claimed inventions in the United States. These other entities include Securus's customers and end users of the Securus Voice Verification Products and Services, including, but not limited to, correctional facilities. Securus actively induces these other entities to engage in these actions by responding to correctional facilities' requests for proposals, such as Securus's response, dated May 21, 2013, to the invitation to negotiate issued by the Florida Department of Corrections; by

advertising, offering for sale, and selling the Securus Voice Verification Products and Services; by configuring the Securus Voice Verification Products and Services so that they will result in infringement when employed for their intended use; and by providing user manuals, product documentation, and other instructions regarding the use of and promotional materials to practice the patented invention. On information and belief, at least from the date of this Complaint forward, Securus's continued engagement in such actions is with specific intent to cause infringement or with willful blindness to the resulting infringement because Securus has actual knowledge of the '243 patent and that its acts are inducing infringement of the '243 patent.

43. Such infringement has injured and damaged GTL, and continues to do so.

44. To the extent that facts learned during the pendency of this case show that Securus's infringement of the '243 patent is willful and deliberate, GTL reserves the right to amend this Complaint and request a finding of willful infringement and seek appropriate relief at the time of trial.

45. On information and belief, Securus will continue to infringe the '243 patent unless enjoined by this Court.

#### **PRAYER FOR RELIEF**

WHEREFORE, GTL prays that the Court enter judgment against Defendant Securus and in favor of Plaintiff GTL with respect to all relief requested in the Complaint, including the following:

(a) adjudicating and declaring that Securus, including through its affiliates, has infringed the Asserted GTL Patents;

(b) permanently enjoining further infringement of the foregoing patents by unauthorized use of the inventions patented therein, by Securus, its affiliates and their officers,

agents, servants, employees, attorneys, and all persons in active concert or participation with them;

(c) awarding GTL damages in an amount to be determined by the Court, plus pre- and post-judgment interest, and costs, as allowed by law, sufficient to compensate GTL for Securus's infringement of the Asserted GTL Patents, in an amount not less than a reasonable royalty;

(d) if Securus's infringement is found to be willful, ordering Securus to pay treble damages to GTL as provided by 35 U.S.C. § 284;

(e) granting GTL such other and further relief as the Court deems just and appropriate.

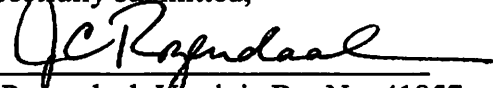
**DEMAND FOR JURY TRIAL**

GTL demands a jury trial on all issues so triable.

Dated: October 21, 2013

Respectfully submitted,

By:



J.C. Rozendaal, Virginia Bar No. 41857

Courtney S. Elwood

Wan J. Kim

Evan T. Leo

Christopher C. Funk

KELLOGG, HUBER, HANSEN, TODD,

EVANS & FIGEL, P.L.L.C.

1615 M Street, NW, Suite 400

Washington, DC 20036

Tel: (202) 326-7900

Fax: (202) 326-7999

*Counsel for Plaintiff Global Tel\*Link  
Corporation*