

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SELECT NOTIFICATIONS MEDIA, LLC,

Plaintiff,

v.

CABLEVISION SYSTEMS CORPORATION
and CSC HOLDINGS, LLC,

Defendants.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Select Notifications Media, LLC (“SNM” or “Plaintiff”), for its Complaint against Defendants Cablevision Systems Corporation and CSC Holdings, LLC (jointly, “Cablevision” or “Defendants”), alleges the following:

THE PARTIES

1. Plaintiff SNM is a Texas limited liability company with a principal place of business at 106 Fannin Avenue East, Round Rock, Texas 78664.
2. On information and belief, Cablevision Systems Corporation is a Delaware corporation with a principal place of business at 1111 Stewart Avenue, Bethpage, New York 11714.
3. On information and belief, CSC Holdings, LLC is a Delaware limited liability company with a principal place of business at 1111 Stewart Avenue, Bethpage, New York 11714.

JURISDICTION AND VENUE

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

5. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). This Court has personal jurisdiction over Defendants at least because they are organized under the laws of Delaware and have thereby purposefully availed themselves of the benefits and protections of the laws of the State of Delaware.

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

JOINDER

7. Joinder of Defendants is proper under 35 U.S.C. § 299. The allegations of patent infringement contained herein arise out of the same transaction, occurrence, or series of transactions or occurrences relating to the making, using, offering for sale, and/or sale within the United States, and/or importing into the United States, of products and/or services for handling and redirecting certain unresolved domain name requests, including but not limited to Optimum DNS Assistance Service.

8. Common questions of fact relating to Defendants will arise in this action.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,631,101

9. SNM re-alleges and incorporates herein by reference the allegations stated in counterclaim paragraphs 1 through 8 above.

10. On December 8, 2009, U.S Patent No. 7,631,101 (“the ’101 Patent”), entitled “Systems and Methods for Direction of Communication Traffic,” was duly and legally issued by the United States Patent and Trademark Office to inventors Alan T. Sullivan, Mark Lewyn, and Phillip Gross. A true and correct copy of the ’101 Patent is attached as **Exhibit A** to this Complaint.

11. SNM is the owner of all rights, title, and interest in the ’101 Patent, and has the right to bring this suit to recover damages for infringement of the ’101 Patent.

12. On information and belief, Cablevision has infringed at least one of the method claims of the '101 Patent under 35 U.S.C. § 271, either literally and/or under the doctrine of equivalents, by making, using, offering for sale, and/or selling in the United States, and/or importing into the United States, products and/or services for handling and redirecting certain unresolved domain name requests, including but not limited to Optimum DNS Assistance Service.

13. On information and belief, Cablevision has profited from infringement of the '101 Patent. SNM has suffered damages as a result of Cablevision's infringement of the '101 Patent, and is entitled to recover from Cablevision damages adequate to compensate it for the infringement under 35 U.S.C. § 284, but in no event less than a reasonable royalty.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, SNM demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

Wherefore, Plaintiff SNM prays for judgment as follows:

- a. a judgment in favor of SNM that Cablevision has infringed and continues to infringe, literally or under the doctrine of equivalents, U.S. Patent No. 7,631,101;
 - b. an award to SNM of damages to which it is entitled for Cablevision's infringement, and ordering a full accounting of same;
 - c. an award to SNM of its costs and disbursements in this civil action, including reasonable attorneys' fees;
 - d. an award to SNM of pre-judgment and post-judgment interest on its damages;
- and,

e. for such further relief at law and in equity as the Court deems just and proper.

Dated: November 14, 2013

STAMOULIS & WEINBLATT LLC

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