

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

DIGITAL MEDIA TECHNOLOGY  
HOLDINGS, LLC,

Plaintiff,

v.

DISNEY MEDIA & ENTERTAINMENT  
DISTRIBUTION LLC,

Defendant.

C.A. No.:

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Digital Media Technology Holdings, LLC (“DMTH” or “Plaintiff”), by and through its undersigned counsel, hereby files this complaint for patent infringement against Disney Media & Entertainment Distribution LLC (“DMED” or “Defendant”) under the patent laws of the United States, Title 35, United States Code, and alleges as follows.

**PARTIES**

1. DMTH is a limited liability company organized and existing under the laws of the State of Delaware with a principal place of business in Toronto, Canada.
2. DMED is a corporation organized and existing under the laws of the State of Delaware with a principal place of business in Burbank, California. Upon information and belief, DMED is a wholly owned and operated subsidiary of The Walt Disney Company (“Disney”).

**JURISDICTION AND VENUE**

3. This Court has federal question jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a) because DMTH seeks relief under the Patent Act, 35 U.S.C. § 271 et seq., including remedies for infringement of a United States Patent owned by DMTH.

4. Personal jurisdiction over DMED is proper because DMED is incorporated in Delaware. Additionally, DMED has systematic and continuous business contacts with Delaware at least resulting from its distribution of multimedia streaming services into Delaware.

5. Venue is proper pursuant to 28 U.S.C. §§ 1391(b) and 1400 because DMED is incorporated in the State of Delaware and a substantial part of the events giving rise to DMTH's claims occurred in this District, including the distribution of multimedia streaming services into this District.

### **FACTUAL ALLEGATIONS**

#### **I. The Asserted Patent**

6. DMTH is the owner of U.S. Patent No. 7,574,725 (the "'725 Patent" or "Asserted Patent") titled "Multimedia Marketing and Distribution System." A true and correct copy of the '725 Patent is attached hereto as Exhibit A.

7. The '725 Patent was duly and lawfully issued on August 11, 2009, by the United States Patent and Trademark office and was valid and enforceable at all times between its date of issuance and its expiration.

8. The sole inventor of the Asserted Patent is Nicholas Stiliadis, an individual currently residing in Toronto, Canada.

9. Mr. Stiliadis is the founder and CEO of DMTH.

10. The '725 Patent discloses systems and methods for marketing and distributing multimedia material, such as motion pictures and television programming, over a computerized network. These systems and methods operate principally through internet servers and digital content platforms, where producers can upload the multimedia material and purchasers can download or view the multimedia material.

## II. DMED's Infringement

11. DMED has infringed the Asserted Patent by making, using, selling, and offering for sale systems and methods for marketing and distributing multimedia materials, such as motion pictures and television programming, over a computerized network. DMED's systems and methods for marketing and distributing multimedia materials includes the Disney Media Distribution platform, which embodies or uses the inventions claimed in the Asserted Patent.

12. DMED sells or has sold access to its products and services, such as the Disney Media Distribution platform, at least through an online website located at <https://www.disneymediadistribution.tv>.

13. DMED's services include the distribution of films and television series from several brands owned by Disney, by way of storing the multimedia materials on servers connected through the internet and allowing users to access the materials on those servers.

### **CLAIM I**

#### **(Infringement of the '725 Patent)**

14. DMTH incorporates and realleges paragraphs 1 through 13 as if fully set forth herein.

15. DMED has infringed at least claim 1 of the '725 Patent by making, using, selling, or offering for sale in the United States, infringing services, including but not limited to DMED's Disney Media Distribution platform, in violation of 35 U.S.C. § 271, literally or under the doctrine of equivalents.

16. DMED's acts of infringement of the '725 Patent have caused damages to DMTH for which DMTH is entitled to compensation pursuant to 35 U.S.C. § 284.

**PRAYER FOR RELIEF**

WHEREFORE, DMTH requests judgment against DMED as follows:

- A. Adjudging that DMED has infringed the Asserted Patent, either literally or under the doctrine of equivalents, in violation of 35 U.S.C. § 271;
- B. Ordering DMED to pay damages adequate to compensate DMTH for DMED's infringement of the Asserted Patent, including pre-judgment and post-judgment interest and costs, pursuant to 35 U.S.C. § 284; and
- C. Such other and further relief that the Court may deem just and proper.

**DEMAND FOR JURY TRIAL**

DMTH hereby demands trial by jury of all issues so triable.

Dated: December 29, 2022

SMITH, KATZENSTEIN & JENKINS LLP

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