

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

HANGER SOLUTIONS, LLC,
Plaintiff,

v.

MEDIACOM COMMUNICATIONS
CORPORATION,
Defendant.

Civil Action No. 4:22-cv-00152

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT

Plaintiff HANGER SOLUTIONS, LLC (hereinafter, “Plaintiff” or “Hanger”), by and through its undersigned counsel, files this Original Complaint for Patent Infringement against Defendant MEDIACOM COMMUNICATIONS CORPORATION (hereinafter, “Defendant” or “Mediacom”), based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendant’s infringement of the following United States Patents (collectively, the “Patents-in-Suit”), copies of which are attached hereto as **Exhibit A, Exhibit B, Exhibit C, Exhibit D, and Exhibit E**, respectively:

	U.S. Patent No.	Title
A.	6,098,098	System For Managing The Configuration Of Multiple Computer Devices
B.	6,119,171	Domain Name Routing
C.	6,430,623	Domain Name Routing
D.	6,772,227	Communicating Between Address Spaces
E.	6,868,160	System And Method For Providing Secure Sharing Of Electronic Data

2. Plaintiff seeks monetary damages.

PARTIES

3. Hanger is a limited liability company organized and existing under the laws of the State of Georgia and maintains its principal place of business at 44 Milton Avenue, Suite 254, Alpharetta, Georgia, 30009 (Fulton County).

4. Based upon public information, Mediacom is a corporation organized and existing under the laws of the State of Delaware since November 8, 1999 with its principal place of business at 1 Mediacom Way, Chester, New York, 10918.

5. Defendant may be served through its registered agent, C T Corporation System, at 289 S. Culver Street, Lawrenceville, Georgia 30046-4805.

6. Based upon public information, Mediacom does its business under the name at least the name “Xtream” as relevant to this matter. *See Exhibit F.*

JURISDICTION AND VENUE

7. Hanger repeats and re-alleges the allegations in Paragraphs above as though fully set forth in their entirety.

8. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

9. The Court has personal jurisdiction over Mediacom because: Defendant has minimum contacts within the State of Georgia and in this District; Defendant has purposefully availed itself of the privileges of conducting business in the State of Georgia and in this District; Defendant has sought protection and benefit from the laws of the State of Georgia; Defendant has

established offices in the State of Georgia and is registered to do business the State of Georgia; Defendant regularly conducts business within the State of Georgia and within this District, and Plaintiff's causes of action arise directly from Defendant's business contacts and other activities in the State of Georgia and in this District.

10. More specifically, Mediacom, directly and/or through its intermediaries, ships, distributes, makes, uses, imports, offers for sale, sells, and/or advertises its products and services in the United States, the State of Georgia, and in this District.

11. Based upon public information, Mediacom solicits customers in the State of Georgia and in this District and has many paying customers who are residents of the State of Georgia and this District and who use its products in the State of Georgia and in this District.

12. Mediacom is registered to do business in the State of Georgia, has offices in the State of Georgia, has transacted business in this District, and has committed acts of direct and indirect infringement in this District.

13. Based upon public information, Mediacom has a regular and established place of business at 6700 Macon Rd, Columbus, Georgia 31907, at which it offers its products that are alleged to infringe one or more claims of the Patents-in-Suit.

14. Defendant has done and does business in this District, and it has committed acts of infringement in, and continues to commit acts of infringement in, this District by directly selling and offering for sale the Accused Products, and its services, including those accused of infringement here, to customers and potential customers located in Georgia, including in this District and at least at the addresses above. Furthermore, Defendant directly and/or through its agents and intermediaries, has regular and established places of business throughout this District

where it operates, sells, services, develops, designs, and/or markets and has operated, sold, serviced, developed, designed, and/or marketed during the relevant period of infringement, one or more of its infringing products at several facilities in this District, including at least at its facilities located at the addresses above.

15. Therefore, Venue is proper in this district under 28 U.S.C. § 1400(b) because Mediacom, directly and/or through its Agents and intermediaries, has at least one place of business in Georgia and this District, and the allegations of infringement involve actions within Georgia and this District. *See In re: Cray Inc.*, 871 F.3d 1355, 1362-1363 (Fed. Cir. 2017).

BACKGROUND INFORMATION

16. The Patents-in-Suit were duly and legally issued by the United States Patent and Trademark Office (hereinafter, the “USPTO”) after full and fair examinations.

17. Plaintiff is the owner of the Patents-in-Suit, and possesses all right, title and interest in the Patents-in-Suit including the right to enforce the Patents-in-Suit, the right to license the Patents-in-Suit, and the right to sue Defendant for infringement and recover past damages.

18. Plaintiff has at all times complied with the marking provisions of 35 U.S.C. § 287 with respect to the Patents-in-Suit.

19. Plaintiff does not sell, offer to sell, make, or use any products itself, so it does not have any obligation to mark any of its own products under 35 U.S.C. § 287.

DEFENDANT’S PRODUCTS AND SERVICES

20. Based upon public information, Mediacom has rights to, owns, operates, advertises, and/or controls the websites mediacom.com and mediacomcable.com and related internal systems architecture/infrastructure (the “Mediacom Website Infrastructure”) through which it advertises,

sells, offers to sell, provides and/or educates customers about its infringing products. *See Exhibit G and Exhibit H.*

21. Based upon public information, shipped, distributed, made, used, imported, offered for sale, sold, made available for use, promoted, and/or advertised its Mediacom Website Infrastructure (the “Website Infrastructure”) in support of its Xstream high speed internet access services and other services. *See Exhibit I.*

22. Based upon public information, Mediacom, directly and/or through its agents and intermediaries, also operates, advertises, and/or controls its office in Columbus, through which it advertises, sells, offers to sell, provides and/or educates customers about its infringing products.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,098,098

23. Plaintiff re-alleges and incorporates by reference each of the paragraphs above.

24. U.S. Patent No. 6,098,098 (the “’098 Patent”) was issued on August 11, 2000, after full and fair examination by the USPTO of Application No. 08/970,831 which was filed on November 14, 1997. *See Ex. A.*

25. The claims of the ’098 Patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve networks and network systems by anonymizing network activity for individual clients and groups of clients.

26. The written description of the ’098 Patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time

of the invention.

27. Hanger owns all substantial rights, interest, and title in and to the '098 Patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

28. Hanger or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '098 Patent.

29. Based upon public information, Plaintiff is informed and believes that Defendant infringed one or more claims of the '098 Patent, either literally or under the doctrine of equivalents, because it shipped, distributed, made, used, imported, offered for sale, sold, made available for use, promoted, and/or advertised its Website Infrastructure which provides a method of communicating data to its customers and partners.

30. Upon information and belief, Defendant's Website Infrastructure meets each and every element of at least Claim 10 of the '098 Patent, either literally or equivalently.

31. Based upon public information, Defendant has infringed one or more claims of the '098 Patent, including Claim 10, because Defendant's Website Infrastructure provides a method for managing the configuration of one or more computers of a network system via a network that provides a first computer that stores a first set of data for configuring itself, provides a second computer that stores a second set of data for configuring the first computer, establishes a connection via said network between said first and second computers, comparing the first set of data with the second set of data to determine if the data sets are different from each other when the two computers are connected without sending the second set of data to the first computer, sending

at least one component of the second set of data to the first computer when the comparison of the first set of data and the second set of data determines that the two sets of data are different from each other, and configuring the first computer in accordance with second set of data.

32. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

33. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 6,119,171

34. Plaintiff re-alleges and incorporates by reference each of the paragraphs above.

35. U.S. Patent No. 6,119,171 (the "'171 Patent") was issued on September 12, 2000, after full and fair examination by the USPTO of Application No. 09/015,840 which was filed on January 29, 1998. *See Ex. B.*

36. The claims of the '171 Patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve networks and network systems by anonymizing network activity for individual clients and groups of clients.

37. The written description of the '171 Patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time

of the invention.

38. Hanger owns all substantial rights, interest, and title in and to the '171 Patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

39. Hanger or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '171 Patent.

40. Based upon public information, Plaintiff is informed and believes that Defendant infringed one or more claims of the '171 Patent, either literally or under the doctrine of equivalents, because it shipped, distributed, made, used, imported, offered for sale, sold, made available for use, promoted, and/or advertised Defendant's Website Infrastructure which provides a method of communicating data to its customers and partners.

41. Upon information and belief, Defendant's Website Infrastructure meets each and every element of at least Claim 1 of the '171 Patent, either literally or equivalently.

42. Based upon public information, Defendant has infringed one or more claims of the '171 Patent, including Claim 1, because, it employs Defendant's Website Infrastructure for communicating data through the steps of receiving a data unit (*e.g.*, data of a discrete size and content), said data unit includes a destination address (*e.g.*, 68.66.66.193) and a first set of information (*e.g.*, server name information like *mediacomcable.com*) representing a first domain name (*e.g.*, *mediacomcable.com*), said destination address corresponds to each entity in a set of two or more entities (*e.g.*, *www.mediacomcable.com* and/or *sso.mediacomcable.com*), said domain name corresponds to a first entity in said set of entities (*e.g.*, a WWW server) translating

said first domain name to a first address (*e.g.*, using DMZ), said first address corresponds to said first entity and does not correspond to any other entity in said set of entities; and sending said data unit to said first entity using said first address (*e.g.*, using TLS).

43. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

44. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 6,430,623

45. Plaintiff re-alleges and incorporates by reference each of the paragraphs above.

46. U.S Patent No. 6,430,623 (the "'623 Patent") was issued on August 6, 2002, after full and fair examination by the USPTO of Application No. 09/492,565 which was filed on January 27, 2000. *See Ex. C.*

47. The claims of the '623 Patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve networks and network systems by anonymizing network activity for individual clients and groups of clients.

48. The written description of the '623 Patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time

of the invention.

49. Hanger owns all substantial rights, interest, and title in and to the '623 Patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

50. Hanger or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '623 Patent.

51. Based upon public information, Plaintiff is informed and believes that Defendant infringed one or more claims of the '623 Patent, either literally or under the doctrine of equivalents, because it shipped, distributed, made, used, imported, offered for sale, sold, made available for use, promoted, and/or advertised Defendant's Website Infrastructure, which provides a method of private network communication between entities on at least www.mediacomcable.com.

52. Upon information and belief, Defendant's Website Infrastructure meets each and every element of at least Claim 1 of the '623 Patent, either literally or equivalently.

53. Based upon public information, Defendant has infringed one or more claims of the '623 Patent, including Claim 1, because, through Defendant's Website Infrastructure because it provides a method for communicating with entities (*e.g.*, domains on various web servers like, for instance, www.mediacomcable.com and/or sso.mediacomcable.com) in a private network (*e.g.*, LAN/VPN/DMZ/firewalled/etc.) that initiates communications (*e.g.*, from outside the private network *via* external device) with a first entity (*e.g.*, www.mediacomcable.com at 68.66.66.193) using a unique identifier (*e.g.*, URL) that is used below the application layer (*e.g.*, using TLS), and where that first entity is in the private network (*e.g.*, DMZ using private subnet), is an

addressable physical entity (*e.g.*, web server) that does not have a globally unique address and can communicate messages (*e.g.*, packets) toward said first entity (*e.g.*, domain) that reach said first entity via an intermediate entity (*e.g.*, router) that has a first global address (*e.g.*, IP address).

54. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

55. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 6,772,227

56. Plaintiff re-alleges and incorporates by reference each of the paragraphs above.

57. U.S Patent No. 6,772,227 (the "'227 Patent") was issued on August 3, 2004, after full and fair examination by the USPTO of Application No. 10/147,442 which was filed on May 16, 2002. *See Ex. D.* A Certificate of Correction was issued on June 5, 2007. *See id.*

58. The claims of the '227 Patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve networks and network systems by anonymizing network activity for individual clients and groups of clients.

59. The written description of the '227 Patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time

of the invention.

60. Hanger owns all substantial rights, interest, and title in and to the '227 Patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

61. Hanger or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '227 Patent.

62. Based upon public information, Plaintiff is informed and believes that Defendant infringed one or more claims of the '227 Patent, either literally or under the doctrine of equivalents, because it shipped, distributed, made, used, imported, offered for sale, sold, made available for use, promoted, and/or advertised Defendant's Website Infrastructure, which provides a method communicating messages between entities in different address spaces on at least www.mediacomcable.com.

63. Upon information and belief, Defendant's Website Infrastructure meets each and every element of at least Claim 1 of the '227 Patent, either literally or equivalently.

64. Based upon public information, Defendant's Website Infrastructure has infringed one or more claims of the '227 Patent, including Claim 1, because it receives a message (packet) from a first entity in a first address space (*e.g.*, 10.0.0.3), said message includes a destination network address (*e.g.*, 68.66.66.193) and an identification of a second entity (*e.g.*, www.mediacomcable.com) in a second address space (*e.g.*, on private subnet using, for instance, DMZ), said second entity does not have a routable address in said first address space; determining a destination address in said second address space (*e.g.*, a WWW server) for said message based

on said identification (*e.g.*, images.mediacomcable.com, sso.mediacomcable.com, and/or similar); and sending said message to a destination using said destination address (*e.g.*, using SNI routing) in said second address space.

65. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

66. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT V: INFRINGEMENT OF U.S. PATENT NO. 6,868,160

67. Plaintiff re-alleges and incorporates by reference each of the paragraphs above.

68. U.S. Patent No. 6,868,160 (the "'160 Patent") was issued on March 15, 2005 after full and fair examination by the USPTO of Application No. 09/435,771 which was filed on November 8, 1999. *See Ex. E.* A Certificate of Correction was issued on January 27, 2009. *See id.*

69. The claims of the '160 Patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve networks and network systems by anonymizing network activity for individual clients and groups of clients.

70. The written description of the '160 Patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from

and improved upon what may have been considered conventional or generic in the art at the time of the invention.

71. Hanger owns all substantial rights, interest, and title in and to the '160 Patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

72. Hanger or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of the '160 Patent.

73. Based upon public information, Plaintiff is informed and believes that Defendant infringed one or more claims of the '160 Patent, either literally or under the doctrine of equivalents, because it shipped, distributed, made, used, imported, offered for sale, sold, made available for use, promoted, and/or advertised Defendant's Website Infrastructure, which provides a method of providing public and private keys.

74. Upon information and belief, Defendant's Website Infrastructure meets each and every element of at least Claim 8 of the '160 Patent, either literally or equivalently.

75. Based upon public information, Defendant infringed one or more claims of the '160 Patent, including Claim 8, because Defendant's Website Infrastructure provides the steps of receiving a key generation request associated with a message (*e.g.*, transmitted *via* TLS), the key generation request including at least one attribute uniquely associated with a user of a device (*e.g.*, Mediacom uses ECDHE for public-private key pairing); generating a public and/or private key associated with the user of the device responsive to the key generation request associated with the message (*e.g.*, said message is sent using the key agreement protocol); and providing the public

key and/or private key to the device (*e.g.*, server key exchange occurs).

76. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

77. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

78. Plaintiff demands a trial by jury on all issues.

PRAYER FOR RELIEF

79. Plaintiff respectfully requests the following relief:

- A. An adjudication that one or more claims of the Patents-in-Suit has been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- B. An award of damages to be paid by Defendant adequate to compensate Plaintiff for Defendant's past infringement, including interest, costs, and disbursements as justified under 35 U.S.C. § 284 and, if necessary to adequately compensate Plaintiff for Defendant's infringement, an accounting of all infringing sales including, but not limited to, those sales not presented at trial;
- C. That this Court declare this to be an exceptional case and award Plaintiff its reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and,
- D. Any further relief that this Court deems just and proper.

Dated: September 28, 2022

Respectfully submitted,

/s/ James F. McDonough, III

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ATTORNEYS FOR PLAINTIFF *HANGER SOLUTIONS, LLC*

* admitted to the Middle District of Georgia

** admission *pro hac vice* anticipated

LIST OF EXHIBITS

- A. U.S. Patent No. 6,098,098
- B. U.S. Patent No. 6,119,171
- C. U.S. Patent No. 6,430,623
- D. U.S. Patent No. 6,772,227
- E. U.S. Patent No. 6,868,160
- F. Webpage: MediacomCable.com
- G. Webpage: mediacom.com/en/specialist-divisions/systems-tech
- H. Webpage: mediacomcable.com/products/
- I. Webpage: mediacomcable.com/products/internet/