

# *Exhibit G*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FACEBOOK, INC,

Plaintiff,

v.

PHOENIX MEDIA/COMMUNICATIONS  
GROUP, INC., PEOPLE2PEOPLE GROUP,  
INC., TELE-PUBLISHING, INC., AND FNX  
BROADCASTING LLC,

Defendants.

C.A. No.

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Facebook, Inc. (“Facebook”) alleges as follows:

1. This is an action for infringement under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.* This action is related to *Tele-Publishing, Inc. v. Facebook, Inc. and TheFacebook, LLC*, C.A. No. 1:09-11686-DPW (D. Mass.), in which Facebook is being sued for alleged patent infringement by Tele-Publishing, Inc. (“TPI”). Pursuant to the Honorable Douglas P. Woodlock’s oral order on October 7, 2010, Facebook is filing its patent counterclaims against TPI (and its affiliates as named herein) in a separate complaint rather than as counterclaims to the pending TPI suit. Facebook will seek to have this action assigned to Judge Woodlock pursuant to his October 7 order and consolidated with the pending TPI action.

**PARTIES**

2. Facebook is a Delaware corporation with its principal place of business at 1601 S. California Avenue, Palo Alto, California 94304.

3. On information and belief, Defendants Phoenix Media/Communications Group, Inc., (“PMC”) People2People Group, Inc. (“P2P”), TPI, and FNX Broadcasting LLC (“FNX”) (collectively, “Defendants”) are Massachusetts corporations with a principal place of business at 126 Brookline Avenue, Boston, Massachusetts 02215, and doing business in this jurisdiction and elsewhere in Massachusetts and the United States.

4. On information and belief, Defendants are among a group of affiliated companies that are commonly owned and controlled. Facebook reserves the right to amend this Complaint to name additional affiliated entities should discovery reveal that they should be named.

#### **JURISDICTION AND VENUE**

5. This Court has federal subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because it arises under the patent laws of the United States (Title 35 of the United States Code).

6. This Court has personal jurisdiction over Defendants because they are Massachusetts corporations, do business in this District, and have committed the acts of infringement complained of herein in this District and elsewhere. Venue is appropriate in this District pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b).

#### **COUNT ONE** **(Infringement of U.S. Patent No. 6,199,157)**

7. Facebook incorporates by reference paragraphs 1-6 as if fully set forth herein.

8. Facebook is the owner by assignment of United States Patent No. 6,199,157 (“the ‘157 patent”), entitled “System, Method and Medium for Managing Information,” issued by the United States Patent and Trademark Office on March 6, 2001. A true and correct copy of the ‘157 patent is attached as Exhibit A.

9. On information and belief, Defendant PMC infringes and has infringed one or more claims of the '157 patent by, for example, providing a computer-implemented method for configuring an item, wherein said item comprises two or more optional components, comprising the steps of: (1) creating two or more options, wherein said two or more options correspond to said two or more optional components; (2) associating attributes with each of said two or more options, wherein said attributes relate to characteristics of said two or more components; (3) creating, from said two or more options, a hierarchical option tree; (4) selecting one or more options from said option tree; (5) implementing, responsive to said step (4), at least one attribute corresponding to said one or more selected options, and placing said at least one attribute into an instance creation file; and (6) accessing and utilizing said instance creation file during the operation of said item, for example, through the “Band Guide,” “Events” search, and “Find Restaurants” features available on PMC’s website, <http://thephoenix.com> (e.g., at <http://bandguide.thephoenix.com/resources.aspx>, <http://thephoenix.com/Boston/Events/Search/>, and <http://thephoenix.com/Boston/Food/>).

10. On information and belief, Defendant PMC, infringes and has infringed one or more claims of the '157 patent by, for example, providing a computer-implemented method for configuring an item, wherein said item comprises two or more optional components, comprising the steps of: (1) creating two or more options, wherein said two or more options correspond to said two or more optional components; (2) associating attributes with each of said two or more options, wherein said attributes relate to characteristics of said two or more components; (3) creating, from said two or more options, a hierarchical option tree; (4) selecting one or more options from said option tree; (5) implementing, responsive to said step (4), at least one attribute corresponding to said one or more selected options, and placing said at least one attribute into an

instance creation file; and (6) accessing and utilizing said instance creation file during the operation of said item, for example, through the “Advanced Search” feature accessible from <http://thephoenix.com/>, provided by PMC through <http://thephoenix.loveaccess.com/>, and through the “Advanced Movie Search” feature accessible from <http://thephoenix.com/adult/blogs/adult/pages/video.aspx>, provided by PMC through <http://theater.aebn.net>.

**11.** On information and belief, Defendants P2P and TPI, infringe and have infringed one or more claims of the '157 patent by, for example, providing a computer-implemented method for configuring an item, wherein said item comprises two or more optional components, comprising the steps of: (1) creating two or more options, wherein said two or more options correspond to said two or more optional components; (2) associating attributes with each of said two or more options, wherein said attributes relate to characteristics of said two or more components; (3) creating, from said two or more options, a hierarchical option tree; (4) selecting one or more options from said option tree; (5) implementing, responsive to said step (4), at least one attribute corresponding to said one or more selected options, and placing said at least one attribute into an instance creation file; and (6) accessing and utilizing said instance creation file during the operation of said item, for example, through the “Advanced Search” feature provided by P2P and TPI through <http://people2people.loveaccess.com/login.htm>, previously accessible from <http://www.people2people.com>.

**12.** On information and belief, each Defendant directly infringes the '157 patent because it makes, uses, and/or sells services that meet each limitation of at least one claim. To the extent elements of any claim are performed by non-parties LifeAccess.com, Inc. d/b/a LoveAccess.com and AEBN (Adult Entertainment Broadcasting Network), Defendants nonetheless directly infringe because they use and sell the entire infringing method, and

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.