

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

HOWLINK GLOBAL LLC,

Plaintiff,

v.

GLOBAL TEL\*LINK CORPORATION,  
CONVERSANT TECHNOLOGIES, INC.,  
DSI-ITI LLC, PUBLIC  
COMMUNICATIONS SERVICES, INC.,  
SIP\*LINK, and VALUE-ADDED  
COMMUNICATIONS, INC.,

Defendants.

Civil Action No.: \_\_\_\_\_

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Howlink Global LLC (“Howlink”) hereby alleges patent infringement against Defendants Global Tel\*Link Corporation (“GTL”), Conversant Technologies, Inc. (“CTI”), DSI-ITI LLC (“DSI”), Public Communications Services, Inc. (“PCS”), Sip\*Link (“SIP”), and Value-Added Communications, Inc. (“VACI”) on personal knowledge and information and belief, as follows:

**THE PARTIES**

1. Howlink is a Texas limited liability company with a principal location at 101 E. Park Blvd, Suite 600, Plano, Texas 75074.
2. On information and belief, GTL is an Delaware corporation with a principal place of business at 12021 Sunset Hills Road, Reston, Virginia 20190.
3. On information and belief, CTI is a Texas corporation with a principal place of business at 6900 Alma Drive, Plano, Texas 75023, and a subsidiary of GTL.
4. On information and belief, DSI is a Delaware corporation with a principal place of business at 5000 Sixth Avenue, Altoona, Pennsylvania 16602, and a subsidiary of GTL.

5. On information and belief, PCS is a California corporation with a principal place of business at 11895 Wilshire Boulevard, Los Angeles, California 90025, and a subsidiary of GTL.

6. On information and belief, SIP is a Delaware corporation with a principal place of business at 12021 Sunset Hills Road, Reston, Virginia 20190, and a subsidiary of GTL.

7. On information and belief, VACI is a Delaware corporation with a principal place of business at 3801 E. Plano Parkway, Plano, Texas 75074, and a subsidiary of GTL.

### **JURISDICTION AND VENUE**

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

9. Personal jurisdiction and venue are proper in this district under 28 U.S.C. §§ 1391(b)-(c), and 1400(b). On information and belief, each Defendant has a regular and established place of business in this district, has transacted business in this district, and/or has committed, contributed to, and/or induced acts of patent infringement in this district.

10. On information and belief, each Defendant is subject to this Court's specific and general personal jurisdiction consistent with the principles of due process and/or the Texas Long Arm Statute, due at least to its substantial business in this forum directly related to the allegations set forth herein, including: (i) a portion of the infringement alleged herein, including making, using, selling, offering to sell, and/or importing products, methods and/or systems that infringe the patent-in-suit; (ii) the presence of established distribution and/or marketing channels; and (iii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals and entities in Texas and this judicial district.

### **COUNT I INFRINGEMENT OF THE '744 PATENT**

11. Howlink is the exclusive owner of all rights to United States Patent No. 7,876,744

entitled “Method for Collect Call Service Based on VoIP Technology and System Thereof” (“‘744 Patent”), including but not limited to the right to sue for damages. The United States Patent and Trademark Office issued the ‘744 Patent on January 25, 2011. A true and correct copy of the ‘744 Patent is attached to this Complaint as Exhibit A.

12. On information and belief, Defendant GTL has been and now is infringing, inducing others to infringe, and/or contributorily infringing, literally, under the doctrine of equivalents, and/or jointly, one or more claims of the ‘744 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing systems and methods that implement, utilize or otherwise embody the patented invention, including by way of example certain telecommunication products and services, such as its “Inmate Telephone System,” “OffenderConnect,” “AdvancePay,” and “LazerPhone,” which are described at least in part online at <http://www.gtl.net>. Therefore, Defendant GTL is liable for infringement of the ‘744 Patent.

13. On information and belief, Defendant CTI has been and now is infringing, inducing others to infringe, and/or contributorily infringing, literally, under the doctrine of equivalents, and/or jointly, one or more claims of the ‘744 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing systems and methods that implement, utilize or otherwise embody the patented invention, including by way of example certain inmate telecommunication products and services, such as its “Inmate Phone Service,” which is described at least in part online at <http://www.cticorrections.com/index.html>. Therefore, Defendant CTI is liable for infringement of the ‘744 Patent.

14. On information and belief, Defendant DSI has been and now is infringing, inducing others to infringe, and/or contributorily infringing, literally, under the doctrine of equivalents, and/or jointly, one or more claims of the ‘744 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing systems and methods that implement, utilize or

otherwise embody the patented invention, including by way of example certain inmate telecommunication products and services, such as its “inmate telephone system,” “Offender Management System,” “Offender Communication System (OCS),” and “LazerPhone,” which are described at least in part online at <http://www.dsiiti.com>. Therefore, Defendant DSI is liable for infringement of the ‘744 Patent.

15. On information and belief, Defendant PCS has been and now is infringing, inducing others to infringe, and/or contributorily infringing, literally, under the doctrine of equivalents, and/or jointly, one or more claims of the ‘744 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing systems and methods that implement, utilize or otherwise embody the patented invention, including by way of example certain inmate telecommunication products and services, such as its “Inmate Communication Services” and “Inmate Calling Services,” which are described at least in part online at <http://www.pcstelcom.com> and <https://payment.pcstelcom.com/payments/>. Therefore, Defendant PCS is liable for infringement of the ‘744 Patent.

16. On information and belief, Defendant SIP has been and now is infringing, inducing others to infringe, and/or contributorily infringing, literally, under the doctrine of equivalents, and/or jointly, one or more claims of the ‘744 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing systems and methods that implement, utilize or otherwise embody the patented invention, including by way of example certain inmate telecommunication products and services, such as its “managed call termination services,” which are described at least in part online at <http://www.siplinknetworks.com/>. Therefore, Defendant SIP is liable for infringement of the ‘744 Patent.

17. On information and belief, Defendant VACI has been and now is infringing, inducing others to infringe, and/or contributorily infringing, literally, under the doctrine of equivalents, and/or jointly, one or more claims of the ‘744 Patent in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using,

selling, offering to sell, and/or importing systems and methods that implement, utilize or otherwise embody the patented invention, including by way of example certain inmate telecommunication products and services, such as its “Inmate Calling Systems” and “Focus” system, which are described at least in part online at <http://www.vaci.com/start.aspx>. Therefore, Defendant VACI is liable for infringement of the ‘744 Patent.

18. On information and belief, Defendant GTL directs, controls and/or owns each of Defendants CTI, DSI, PCS, SIP and VACI and their respective operations, revenues, and customer contracts.

19. On information and belief, the infringing systems and services of the Defendants overlap, intertwine, and/or share wholly or partly the same or common platform.

20. Howlink has been and is irreparably harmed by each Defendant’s infringement of the ‘744 Patent. Howlink has incurred and will continue to incur substantial damages, including monetary damages, unless each Defendant is enjoined from further acts of infringement.

21. To the extent that facts uncovered in discovery show that a Defendant’s infringement is, or has been, willful, Howlink reserves the right to seek enhanced damages and attorneys fees.

#### **PRAYER FOR RELIEF**

WHEREFORE, Howlink respectfully requests that this Court:

- (a) enter judgment in favor of Howlink that each Defendant has infringed, and continues to infringe, the ‘744 Patent;
- (b) enjoin each defendant, its officers, subsidiaries, agents, servants, employees, and all persons in active concert with any of them, from any further infringement of the ‘744 Patent;
- (c) award Howlink all monetary relief available under the patent laws of the United States, including but not limited to actual damages, pre- and post- judgment interest, enhanced damages, and costs pursuant to 35 U.S.C. § 284;
- (d) declare this case exceptional and award Howlink its reasonable attorneys’ fees

pursuant to 35 U.S.C. § 285; and

(e) grant Howlink such other relief as the Court deems just and equitable.

**DEMAND FOR JURY TRIAL**

Howlink demands a trial by jury on all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Date: April 18, 2012

Respectfully submitted,

/s/ Elizabeth L. DeRieux

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