

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

Global Findability, Inc.)
455 Massachusetts Ave., N.W.)
Suite 150)
Washington, D.C. 20001)

Plaintiff,)

vs.)

Summit Entertainment, LLC.)
1630 Stewart St.)
Suite 120)
Santa Monica, CA 90404)

And)

Escape Artists, LLC.)
10202 W. Washington Blvd.)
Astaire Bldg., 3rd Floor)
Culver City, CA 90232)

Defendants.)

Civil Action No.

VERIFIED COMPLAINT

Plaintiff Global Findability, Inc., complains as follows against Defendants Summit Entertainment, LLC., and Escape, LLC.

PARTIES

1. Plaintiff Global Findability, Inc. (Global Findability) is a Corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 455 Massachusetts Ave. N.W., Suite 150, Washington, D.C. 20001.

2. On information and belief, defendant Summit Entertainment, LLC., (Summit) is a Limited Liability Corporation organized and existing under the laws of the State of California, with its principal place of business 1630 Stewart St., Ste. 120, Santa Monica, CA 90404.

3. On information and belief, defendant Escape Artists, LLC., (Escape) is a Limited Liability Corporation organized and existing under the laws of the State of California, with its

principal place of business at 10202 W. Washington Blvd., Astaire Bldg., 3rd Fl., Culver City, CA 90232.

JURISDICTION

4. This is an action for patent infringement under the United States Patent Laws, 35 U.S.C. § 271, *et. seq.* This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. Defendants Summit and Escape conduct business in this Judicial District and have committed acts of patent infringement in this Judicial District including, using, offering for sale, and/or selling infringing products and/or methods in this Judicial District.

6. On information and belief, Defendants Summit and Escape Artist actively contributed to infringement and/or have induced others to commit such acts of infringement in this Judicial District.

VENUE

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) and (c) and §§1400(b), because, *inter alia*, each defendant is subject to personal jurisdiction in this district.

FACTUAL BACKGROUND

8. Plaintiff Global Findability, Inc. is the owner by assignment of all right, title, and interest in and to United States Patent No. 7,107,286 (“the ‘286 patent”) entitled “Integrated Information Processing System for Geospatial Media,” which duly and legally issued in the name of Carl M. Burnett on September 12, 2006. A copy of the ‘286 patent is attached to the Complaint as Exhibit A.

9. Upon information and belief, defendants Summit. and Escape, LLC. created, used, offer for sale, and/or sell geospatial entity object code (hereinafter called “Geocode[®]”) in its product, a film entitled “Knowing” (hereinafter called “The Film”).

10. Upon information and belief, defendants Summit. and Escape, LLC. have made, used, offered to sell, and/or sold, and continues to make, use, offer to sell, and/or sell the Film, within this Judicial District, including, without limitation, the Geocode[®] product that infringes Global

Findability's Patents.

COUNT 1: PATENT INFRINGEMENT

11. Global Findability realleges and incorporates by reference the allegations set forth in paragraphs 1-10 above.

12. Upon information and belief, defendants Summit. and Escape, LLC. have infringed and are infringing the '286 patent by making, using, importing, offering for sale and/or selling in the United States, without authority, the Film that embodies the invention claimed in the '286 patent and/or on information and belief, by actively inducing or contributing to infringement of said patent by others.

13. Upon information and belief, defendants Summit. and Escape, LLC's infringement of the '286 patent will continue unless enjoined by this Court.

14. As a direct and proximate consequence of defendants Summit. and Escape, LLC's infringement of the '286 patent, Global Findability has suffered and will continue to suffer irreparable injury and damages in an amount not yet determined for which Global Findability is entitled to relief.

15. Upon information and belief, Defendants Summit and Escape Artist had prior notice and knowledge of the '286 patent and has acted in an objectively reckless manner in disregard of the '286 patent such that its actions constitute willful infringement.

PRAYER FOR RELIEF

Wherefore, Global Findability prays for relief and judgment as follows:

A. That Defendants Summit and Escape directly, contributorily and/or through inducement infringed and continues to infringe the '286 patent;

B. That Summit and Escape, and their respective officers, directors, consultants, managers, agents, servants, employees, attorneys, affiliates, subsidiaries, and all persons in active concert or participation with any of them, and their successors and assigns, be permanently enjoined from infringement, inducement of infringement, and contributory infringement of the '286 patent, including, but not limited to, making, using, offering for sale, selling within the

United States, or importing any products or processes into the United States, that infringe the '286 patent

C. That Global Findability be awarded all damages adequate to compensate it for the infringement by each Defendant, but in no event less than a reasonable royalty for the use made of the invention by each Defendant, together with interest and costs as fixed by the Court;

D. That Summit and Escape be found to have willfully infringed the '286 patent;

E. That the damages awarded to Global Findability be trebled pursuant to 35 U.S.C. §284;

F. That this case be declared an exceptional case within the meaning of 35 U.S.C. §285 and that Global Findability be awarded its attorneys' fees in this action; and

G. That Global Findability be awarded such other and further relief as this Court deems just and proper.

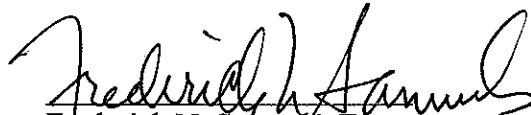
DEMAND FOR JURY TRIAL

Global Findability hereby respectfully demands a jury trial on all claims and issues so triable.

Respectfully submitted by

CAHN & SAMUELS, LLP
Attorneys for Plaintiff

Dated: November 25, 2009


Frederick N. Samuels, Esq.

DC Bar No. 436202

frederick.samuels@cahnsamuels.com

Maurice U. Cahn, Esq.

DC Bar No. 382559

William E. Bradley, Esq.

DC Bar No. 463695

1100 17th St., N.W., Ste. 401

Washington, D.C. 20036

(202) 331-8777 Phone

(202) 331-3838 FAX

VERIFICATION OF COMPLAINT

I, Carl Burnett, principal of Global Findability, Inc., declare that:

1. I have read the foregoing Verified Complaint and am familiar with the allegations and statements contained therein.
2. To the best of my knowledge, information and belief, founded after reasonable inquiry, the allegations in the Verified Complaint are well grounded in fact, are warranted by existing law or good faith argument for extension, modification, or establishment of new law.
3. The foregoing Verified Complaint is not being filed for any improper purpose.
4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

11/22/2009
Date



Carl Burnett