

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MISSION ABSTRACT DATA L.L.C.,
d/b/a DIGIMEDIA,

Plaintiff,

v.

Civil Action No. _____

BEASLEY BROADCAST GROUP, INC.,
BEASLEY BROADCASTING OF
GREENVILLE, INC., BEASLEY
BROADCASTING OF SOUTHWEST
FLORIDA, INC., BEASLEY FM
ACQUISITION CORP., BEASLEY
RADIO, INC., CBS RADIO INC., CBS
RADIO EAST HOLDINGS
CORPORATION, CBS RADIO EAST
INC., CBS RADIO HOLDINGS CORP.
OF MASSACHUSETTS, CBS RADIO
HOLDINGS CORP. OF ORLANDO,
CBS RADIO INC. OF ATLANTA, CBS
RADIO INC. OF BOSTON, CBS RADIO
INC. OF CHICAGO, CBS RADIO INC.
OF DETROIT, CBS RADIO INC. OF
FLORIDA, CBS RADIO INC. OF
GLENDALE, CBS RADIO INC. OF
ILLINOIS, CBS RADIO INC. OF LOS
ANGELES, CBS RADIO INC. OF
MARYLAND, CBS RADIO INC. OF
MICHIGAN, CBS RADIO INC. OF
NORTHERN CALIFORNIA, CBS RADIO
INC. OF PHILADELPHIA, CBS RADIO
INC. OF TAMPA, CBS RADIO INC. OF
WASHINGTON, CBS RADIO INC. OF
WASHINGTON, D.C., CBS RADIO
KFRC-AM INC., CBS RADIO KMVQ-FM
INC., CBS RADIO MEDIA
CORPORATION, CBS RADIO
NETWORK INC., CBS RADIO
PROMOTIONS GROUP INC., CBS
RADIO SALES COMPANY, CBS RADIO
SERVICES INC., CBS RADIO STATIONS
INC., CBS RADIO TECHNICAL SERVICES
INC., CBS RADIO TEXAS INC., CBS

JURY TRIAL DEMANDED

RADIO TOWER INC., CBS RADIO
VENTURES, INC., CBS RADIO WPGC
(AM) INC., COX RADIO, INC.,
CUMULUS MEDIA INC., CUMULUS
MEDIA PARTNERS, LLC,
ENTERCOM COMMUNICATIONS
CORP., ENTERCOM AUSTIN, LLC,
ENTERCOM BOSTON, LLC,
ENTERCOM BUFFALO, LLC,
ENTERCOM CAPITAL, INC.,
ENTERCOM DENVER, LLC,
ENTERCOM GAINESVILLE, LLC,
ENTERCOM GREENSBORO, LLC,
ENTERCOM GREENVILLE, LLC,
ENTERCOM INCORPORATED,
ENTERCOM INDIANAPOLIS, LLC,
ENTERCOM KANSAS CITY, LLC,
ENTERCOM MADISON, LLC,
ENTERCOM MEMPHIS, LLC,
ENTERCOM MILWAUKEE, LLC,
ENTERCOM NEW ORLEANS, LLC,
ENTERCOM NORFOLK, LLC,
ENTERCOM PORTLAND, LLC,
ENTERCOM PROPERTIES, LLC,
ENTERCOM PROVIDENCE, LLC,
ENTERCOM RADIO, LLC,
ENTERCOM ROCHESTER, LLC,
ENTERCOM SACRAMENTO, LLC,
ENTERCOM SAN FRANCISCO, LLC,
ENTERCOM SEATTLE, LLC,
ENTERCOMS, INC.,
ENTERCOM SPRINGFIELD, LLC,
ENTERCOM WICHITA, LLC,
ENTERCOM WILKES-BARRE,
SCRANTON, LLC,
GREATER MEDIA, INC., GREATER
MEDIA RADIO, INC., GREATER
MEDIA HOLDCO, LLC,
TOWNSQUARE MEDIA, LLC,
TOWNSQUARE MEDIA ABILENE,
LLC, TOWNSQUARE MEDIA
AMARILLO, LLC, TOWNSQUARE
MEDIA BILLINGS, LLC,
TOWNSQUARE MEDIA BOZEMAN,
LLC, TOWNSQUARE MEDIA BROAD-
CASTING, LLC, TOWNSQUARE

MEDIA CASPER, LLC, TOWNSQUARE
MEDIA CHEYENNE, LLC, TOWN-
SQUARE MEDIA DULUTH, LLC,
TOWNSQUARE MEDIA, INC.,
TOWNSQUARE MEDIA LAKE
CHARLES, LLC, TOWNSQUARE
MEDIA LARAMIE, LLC, TOWNSQUARE
MEDIA LAWTON, LLC, TOWNSQUARE
MEDIA LUBBOCK, LLC, TOWNSQUARE
MEDIA LUFKIN, LLC, TOWNSQUARE
MEDIA MISSOULA, LLC,
TOWNSQUARE MEDIA OF ALBANY,
INC., TOWNSQUARE MEDIA OF
ALBANY AND LAFAYETTE, INC.,
TOWNSQUARE MEDIA OF BLOOMING-
TON, INC, TOWNSQUARE MEDIA OF
BUFFALO, INC., TOWNSQUARE MEDIA
OF EL PASO, INC., TOWNSQUARE
MEDIA OF EVANSVILLE/OWENSBORO,
INC., TOWNSQUARE MEDIA OF
FLINT, INC., TOWNSQUARE MEDIA
OF FT. COLLINS, INC., TOWNSQUARE
MEDIA OF GRAND RAPIDS, INC.,
TOWNSQUARE MEDIA OF
LAFAYETTE, LLC, TOWNSQUARE
MEDIA OF MIDWEST, LLC,
TOWNSQUARE MEDIA OF PEORIA,
INC., TOWNSQUARE MEDIA OF ST.
CLOUD, INC., TOWNSQUARE MEDIA
OF UTICA/ROME, INC., TOWNSQUARE
MEDIA POCATELLO, LLC,
TOWNSQUARE MEDIA SHELBY, LLC,
TOWNSQUARE MEDIA SHREVEPORT,
LLC, TOWNSQUARE MEDIA
TEXARKANA, LLC, TOWNSQUARE
MEDIA TRI-CITIES, LLC,
TOWNSQUARE MEDIA TWIN FALLS,
LLC, TOWNSQUARE MEDIA TYLER,
LLC, TOWNSQUARE MEDIA
VICTORIA, LLC, TOWNSQUARE
MEDIA WEST CENTRAL HOLDINGS,
LLC, TOWNSQUARE MEDIA WEST
CENTRAL INTERMEDIATE HOLDINGS,
LLC, TOWNSQUARE MEDIA WEST
CENTRAL RADIO BROADCASTING,
LLC, TOWNSQUARE MEDIA WICHITA

FALLS, LLC, TOWNSQUARE MEDIA
YAKIMA, LLC,

Defendants.

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Mission Abstract Data L.L.C., d/b/a DigiMedia (“Plaintiff” or “DigiMedia”), for its Complaint against Defendants Beasley Broadcast Group, Inc., Beasley Broadcasting of Greenville, Inc., Beasley Broadcasting of Southwest Florida, Inc., Beasley FM Acquisition Corp., Beasley Radio, Inc., CBS Radio Inc., CBS Radio East Holdings Corporation, CBS Radio East Inc., CBS Radio Holdings Corp. of Massachusetts, CBS Radio Holdings Corp. of Orlando, CBS Radio Inc. of Atlanta, CBS Radio Inc. of Boston, CBS Radio Inc. of Chicago, CBS Radio Inc. of Detroit, CBS Radio Inc. of Florida, CBS Radio Inc. of Glendale, CBS Radio Inc. of Illinois, CBS Radio Inc. of Los Angeles, CBS Radio Inc. of Maryland, CBS Radio Inc. of Michigan, CBS Radio Inc. of Northern California, CBS Radio Inc. of Philadelphia, CBS Radio Inc. of Tampa, CBS Radio Inc. of Washington, CBS Radio Inc. of Washington, D.C., CBS Radio KFRC-AM Inc., CBS Radio KMQV-FM Inc., CBS Radio Media Corporation, CBS Radio Network Inc., CBS Radio Promotions Group Inc., CBS Radio Sales Company, CBS Radio Services Inc., CBS Radio Stations Inc., CBS Radio Technical Services Inc., CBS Radio Texas Inc., CBS Radio Tower Inc., CBS Radio Ventures, Inc., CBS Radio WPGC (AM) Inc., Cox Radio, Inc., Cumulus Media Inc., Cumulus Media Partners, LLC, Entercom Communications Corp., Entercom Austin, LLC, Entercom Boston, LLC, Entercom Buffalo, LLC, Entercom Capital, Inc., Entercom Denver, LLC, Entercom Gainesville, LLC, Entercom Greensboro, LLC, Entercom Greenville, LLC, Entercom

Incorporated, Entercom Indianapolis, LLC, Entercom Kansas City, LLC, Entercom Madison, LLC, Entercom Memphis, LLC, Entercom Milwaukee, LLC, Entercom New Orleans, LLC, Entercom Norfolk, LLC, Entercom Portland, LLC, Entercom Properties, LLC, Entercom Providence, LLC, Entercom Radio, LLC, Entercom Rochester, LLC, Entercom Sacramento, LLC, Entercom San Francisco, LLC, Entercom Seattle, LLC, Entercoms, Inc., Entercom Springfield, LLC, Entercom Wichita, LLC, Entercom Wilkes-Barre Scranton, LLC, Greater Media, Inc., Greater Media Radio, Inc., Greater Media Holdco, LLC, and Townsquare Media, LLC, Townsquare Media Abilene, LLC, Townsquare Media Amarillo, LLC, Townsquare Media Billings, LLC, Townsquare Media Bozeman, LLC, Townsquare Media Broadcasting, LLC, Townsquare Media Casper, LLC, Townsquare Media Cheyenne, LLC, Townsquare Media Duluth, LLC, Townsquare Media, Inc., Townsquare Media Lake Charles, LLC, Townsquare Media Laramie, LLC, Townsquare Media Lawton, LLC, Townsquare Media Lubbock, LLC, Townsquare Media Lufkin, LLC, Townsquare Media Missoula, LLC, Townsquare Media of Albany, Inc., Townsquare Media of Albany and Lafayette, Inc., Townsquare Media of Bloomington, Inc., Townsquare Media of Buffalo, Inc., Townsquare Media of El Paso, Inc., Townsquare Media of Evansville/Owensboro, Inc., Townsquare Media of Flint, Inc., Townsquare Media of Ft. Collins, Inc., Townsquare Media of Grand Rapids, Inc., Townsquare Media of Lafayette, LLC, Townsquare Media of Midwest, LLC, Townsquare Media of Peoria, Inc., Townsquare Media of St. Cloud, Inc., Townsquare Media of Utica/Rome, Inc., Townsquare Media Pocatello, LLC, Townsquare Media Shelby, LLC, Townsquare Media Shreveport, LLC, Townsquare Media Texarkana, LLC, Townsquare Media Tri-Cities, LLC, Townsquare Media Twin Falls, LLC, Townsquare

Media Tyler, LLC, Townsquare Media Victoria, LLC, Townsquare Media West Central Holdings, LLC, Townsquare Media West Central Intermediate Holdings, LLC, Townsquare Media West Central Radio Broadcasting, LLC, Townsquare Media Wichita Falls, LLC, and Townsquare Media Yakima, LLC (collectively “the Defendants”) hereby alleges as follows:

THE PARTIES

1. Plaintiff Mission Abstract Data L.L.C., d/b/a DigiMedia is a limited liability company organized and existing under the laws of the state of Delaware and may be served through its registered agent Corporation Service Company at 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

2. Defendant Beasley Broadcast Group, Inc. is a Delaware corporation with a principal place of business at 3033 Riviera Drive Suite 200, Naples, Florida 34103 and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808. Beasley Broadcasting of Greenville, Inc. is a Delaware corporation and may be served with process through its registered agent, The Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808. Beasley Broadcasting of Southwest Florida, Inc. is a Delaware corporation and may be served with process through its registered agent, The Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808. Beasley FM Acquisition Corp. is a Delaware corporation and may be served with process through its registered agent, The Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808. Beasley Radio, Inc. is a Delaware corporation and may be served with process

through its registered agent, The Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware, 19808. These Defendants are collectively referred to as the “Beasley Defendants.”

3. Defendant CBS Radio Inc. is a Delaware corporation with a principal place of business at 40 West 57th Street, New York, New York 10019 and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio East Holdings Corporation is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio East Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Holdings Corp. of Massachusetts is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Holdings Corp. of Orlando is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Atlanta is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Boston is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Chicago is a Delaware corporation and may be served with process through its registered agent,

Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Detroit is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Florida is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Glendale is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Illinois is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Los Angeles is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Maryland is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Michigan is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Northern California is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Philadelphia is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of

Tampa is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Washington is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Inc. of Washington, D.C. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio KFRC-AM Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio KMQV-FM Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Media Corporation is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Network Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Promotions Group Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Sales Company is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Services Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation

Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Stations Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Technical Services Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Texas Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Tower Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio Ventures, Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. CBS Radio WPGC (AM) Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. These Defendants are collectively referred to as the "CBS Radio Defendants."

4. Defendant Cox Radio, Inc. is a Delaware corporation and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808.

5. Defendant Cumulus Media Inc. is a Delaware corporation with a principal place of business at 3280 Peachtree Road, NW Suite 2300, Atlanta, Georgia 30305, and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

Defendant Cumulus Media Partners, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. These Defendants are collectively referred to as the “Cumulus Media Defendants.”

6. Defendant Entercom Communications Corp. is a Pennsylvania corporation with a principal place of business at 401 City Avenue, Suite 409, Bala Cynwyd, Pennsylvania 19004 and may be served with process through its registered officer, David J. Field, 401 City Avenue, Suite 409, Bala-Cynwyd, PA 19004. Entercom Austin, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Boston, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Buffalo, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Capital, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Denver, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Gainesville, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Greensboro, LLC is a

Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Greenville, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Incorporated is a Delaware corporation and may be served with process through its registered agent, Belfint, Lyons & Shuman, P.A., 1011 Centre Road, Suite 310, Wilmington, DE 19805. Entercom Indianapolis, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Kansas City, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Madison, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Memphis, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Milwaukee, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom New Orleans, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Norfolk, LLC is a Delaware company and may be served with process through

its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Portland, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Properties, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Providence, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Radio, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Rochester, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Sacramento, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom San Francisco, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Seattle, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercoms, Inc. is a Delaware corporation and may be served with process through its registered agent, Capitol

Services, Inc., 615 South Dupont Highway, Dover, DE 19901. Entercom Springfield, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Wichita, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Entercom Wilkes-Barre Scranton, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. These Defendants are collectively referred to as the "Entercom Defendants."

7. Defendant Greater Media, Inc. is a Delaware corporation with a principal place of business at 35 Braintree Hill Park, Suite 300, Braintree, Massachusetts 02184 and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Greater Media Radio, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Greater Media Holdco, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. These Defendants are collectively referred to as the "Greater Media Defendants."

8. Defendant Townsquare Media, LLC is a Delaware company with a principal place of business at 240 Greenwich Avenue, Greenwich, Connecticut 06830 and may be served with process through its registered agent, Corporation Service

Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Abilene, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Amarillo, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Billings, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Bozeman, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Broadcasting, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media Casper, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Cheyenne, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Duluth, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington,

DE 19801. Townsquare Media Lake Charles, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Laramie, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Lawton, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Lubbock, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Lufkin, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Missoula, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media of Albany, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Albany and Lafayette, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Bloomington, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of

Buffalo, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of El Paso, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Evansville/Owensboro, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Flint, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Ft. Collins, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Grand Rapids, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Lafayette, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Midwest, LLC is a Delaware company and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Peoria, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company,

Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of St. Cloud, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media of Utica/Rome, Inc. is a Delaware corporation and may be served with process through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Townsquare Media Pocatello, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Shelby, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Shreveport, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Texarkana, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Tri-Cities, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Twin Falls, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Tyler, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904.

Townsquare Media Victoria, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media West Central Holdings, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media West Central Intermediate Holdings, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media West Central Radio Broadcasting, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. Townsquare Media Wichita Falls, LLC is a Delaware company and may be served with process through its registered agent, National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Townsquare Media Yakima, LLC is a Delaware company and may be served with process through its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808. These Defendants are collectively referred to as the "Townsquare Media Defendants."

JURISDICTION AND VENUE

9. This is a civil action for patent infringement arising under the Acts of Congress relating to patents, including Title 35 United States Code § 1 *et seq.*

10. This Court has jurisdiction over the subject matter of this action pursuant to at least Title 28 United States Code §§1331 and 1338(a).

11. Venue with respect to the Defendants is proper within this district pursuant to Title 28 United States Code §§ 1391(b) and (c) and 1400(b).

12. Personal jurisdiction over Defendants comports with the United States Constitution and 10 Del. C. § 3104 because the Defendants are citizens of this state and/or have systematic and continuous contacts with this state.

BACKGROUND OF THE DIGIMEDIA PATENTS

13. Plaintiff is the owner of United States Patent No. 5,629,867 entitled “Selection and Retrieval of Music from a Digital Database” (“the ‘867 patent”), which was duly and legally issued by the United States Patent and Trademark Office on May 13, 1997. The ‘867 patent is assigned to Plaintiff DigiMedia. A copy of the ‘867 patent is attached hereto as Exhibit A.

14. Plaintiff is the owner of United States Patent No. 5,809,246 entitled “Selection and Retrieval of Music from a Digital Database” (“the ‘246 patent”), which was duly and legally issued by the United States Patent and Trademark Office on September 15, 1998. The ‘246 patent is assigned to Plaintiff DigiMedia. A copy of the ‘246 patent is attached hereto as Exhibit B.

15. Plaintiff DigiMedia has the exclusive right to make, use, sell and offer to sell the inventions of the ‘867 and ‘246 patents, and has the right to sue and to recover for past, present, and future infringement of the claims of the ‘867 and ‘246 patents (collectively the “DigiMedia patents”).

16. The DigiMedia patents relate generally to a method and system for operating radio stations wherein a digital database stores music that is programmed, played and broadcast by the radio stations.

BACKGROUND OF THE SHIFT TO THE DIGIMEDIA TECHNOLOGY IN THE RADIO INDUSTRY

17. Prior to the invention set forth in the DigiMedia patents, operation of a music-based radio station was a cumbersome and expensive process. As pointed out in the specification of the DigiMedia patents: “In a typical prior art radio station environment, the disks to be played and broadcast are located and retrieved from a CD musical library. The disks are then loaded into a CD player, the music cued to play, and subsequently the disks are returned to the library after play, actions which require time, labor, money and space.” ‘867 Patent, Col. 1, ll. 20-26.

18. Similarly, in an NAB Engineering Handbook from 2007, an article entitled “Radio Station Automation, Networks, and Audio Storage” noted with respect to prior art cart systems: “their dependency on extensive mechanical transports made them high-maintenance devices and limited their flexibility. Even the audio quality was hard to maintain due to the number of capstans and tape heads involved. Broadcasters needed newer, higher quality, easier to maintain, more versatile automation systems.” (P. 144).

19. The technology covered by the claims of the DigiMedia patents was a revelation in the radio industry. In an article entitled “Music Delivery Enters Digital Age: Hard-Drive Systems Lead the Way at Radio,” published in Billboard Newspaper on April 12, 1997, pages 71-72, a staff engineer for the National Association of Broadcasters (NAB) stated that in 1997, “there’s certainly an accelerated migration toward all-digital, computer hard-drive-based systems for music storage and delivery at FM and AM stations. It’s not just the better digital quality. With the significantly lower costs for better equipment, a station can have almost all-electronic music delivery with no physical handling of an NAB cartridge, CD, or MiniDisc [MD].” (P. 71). Through utilizing

technology described in the DigiMedia patents “[t]he biggest shift in music delivery and storage is to computer hard drives.” (P. 71).

20. The Billboard Newspaper article highlights the major shift that was occurring in the radio industry in 1997 due to the innovative technology of the DigiMedia patents: “Fidelipac in Mount Laurel, N.J., and Audiopak in Winchester, Va., are the last remaining manufacturers of NAB cartridge hardware and software. ‘We see the final handwriting on the wall,’ says David Strode, Fidelipac sales and marketing manager. ‘If we can get a few more years out of the carts, we’ll be amazed.’” (P. 72).

21. The article entitled “Radio Station Automation, Networks, and Audio Storage” from the 2007 NAB Engineering Handbook discusses how the personal computer revolutionized radio station automation, and how “the current state of the art dictates that [storage] will end up on hard disk drives. This technology has made huge advances in capacity, speed, and reliability that have helped propel digital computing systems into the mainstream of nearly all broadcast operations.” (P. 160). In 2007, “the most common storage architecture for automation systems is to use a centralized file server. This is basically just another networked PC with a lot of storage capacity. However, server hardware is usually more powerful with multiple high-speed CPUs, multiple gigabytes of RAM, multiple Gigabit network interface connections, and a large RAID disk array.” (P. 163).

22. Industry participants have also confirmed the widespread adoption of databases and hard drives to store and play music in radio stations across the United States.

THE DEFENDANTS

23. Upon information and belief, the Beasley Defendants currently own or operate approximately 45 radio stations located in eleven large- and mid-size markets across the United States.

24. Upon information and belief, the CBS Radio Defendants own or operate approximately 130 radio stations in the United States.

25. Upon information and belief, Cox Radio, Inc. owns, operates, and/or provides sales and marketing services to approximately 86 stations in 19 markets in the United States.

26. Upon information and belief, the Cumulus Media Defendants own and operate approximately 347 radio stations serving about 68 mid- and large-sized markets throughout the United States.

27. Upon information and belief, the Entercom Defendants collectively are one of the five largest radio broadcasting companies in the United States, with a nationwide portfolio of approximately 100 radio stations in 23 markets.

28. Upon information and belief, the Greater Media Defendants own and operate approximately 21 radio stations in 5 markets throughout the United States.

29. Upon information and belief, the Townsquare Media Defendants own and operate approximately 171 radio stations and associated digital assets in 36 United States cities.

30. Upon information and belief, each named Defendant uses computer hard-drive-based systems in connection with music storage, broadcast, and acquisition at their

music broadcast radio stations, and is otherwise utilizing inventions claimed in the '867 and '246 patents.

COUNT I: INFRINGEMENT OF THE '867 PATENT

31. The allegations in all the paragraphs above are incorporated by reference into Plaintiff's Count I as fully set forth herein.

32. Upon information and belief, each named Defendant is infringing or has infringed one or more claims of the '867 patent-in-suit through, among other activities, the use of the claimed technology for storing, selecting, retrieving and broadcasting music over the radio stations that each Defendant owns and operates.

33. Upon information and belief, each named Defendant infringes and/or has infringed one or more claims of the '867 patent-in-suit either literally or under the doctrine of equivalents in violation of 35 U.S.C. § 271.

34. Upon information and belief, each named Defendant infringes and/or has infringed one or more claims of the '867 patent-in-suit in violation of 35 U.S.C. § 271.

35. The Defendants' infringement of one or more claims of the '867 patent-in-suit has injured DigiMedia and will continue to do so unless enjoined by this Court.

COUNT II: INFRINGEMENT OF THE '246 PATENT

36. The allegations in all the paragraphs above are incorporated by reference into Plaintiff's Count II as fully set forth herein.

37. Upon information and belief, each named Defendant is infringing or has infringed one or more claims of the '246 patent-in-suit through, among other activities, the use of the claimed technology for storing, selecting, retrieving and broadcasting music over the radio stations that each Defendant owns and operates.

38. Upon information and belief, each named Defendant infringes and/or has infringed one or more claims of the '246 patent-in-suit either literally or under the doctrine of equivalents in violation of 35 U.S.C. § 271.

39. Upon information and belief, each named Defendant infringes and/or has infringed one or more claims of the '246 patent-in-suit in violation of 35 U.S.C. § 271.

40. The Defendants' infringement of one or more claims of the '246 patent-in-suit has injured DigiMedia and will continue to do so unless enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff DigiMedia, prays for relief as follows:

1. For judgment that the Defendants have infringed the '867 and '246 patents;

2. For a permanent injunction prohibiting the Defendants and their respective agents, servants, officers, directors, employees and all persons acting in concert with them, directly or indirectly, from infringing claims of the '867 and '246 patents, or from contributing to or inducing others to infringe the claims of the '867 and '246 patents;

3. For an award of damages, with interest, for infringement of the '867 and '246 patents;

4. For a post-judgment equitable accounting of damages to be ordered for the period of infringement of the '867 and '246 patents following the period of damages established by DigiMedia at trial;

5. Costs and attorneys fees under 35 U.S.C. section 285 to the extent this Court finds this case to be exceptional;

6. Such other and further relief as this Court may deem just and equitable.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff Mission Abstract Data L.L.C., d/b/a DigiMedia demands a trial by jury on all triable issues.

Dated: March 1, 2011

FARNAN LLP

/s/ Brian E. Farnan

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