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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**JOHN BAKER ORANGE on behalf of
himself and all others similarly
situated,**

Plaintiff

v.

**RING LLC and
AMAZON.COM, INC.**

Defendant.

CASE NO.: 2:19-cv-10899

CLASS ACTION

**COMPLAINT FOR DAMAGES,
EQUITABLE, DECLARATORY,
AND INJUNCTIVE RELIEF FOR:**

- (1) NEGLIGENCE**
- (2) INVASION OF PRIVACY**
- (3) BREACH OF THE IMPLIED
WARRANTY OF
MERCHANTABILITY**
- (4) BREACH OF IMPLIED
CONTRACT**
- (5) UNJUST ENRICHMENT**
- (6) VIOLATION OF THE
UNFAIR COMPETITION**

**LAW (“UCL”) CAL. BUS.
PROF. CODE § 17200**

DEMAND FOR JURY TRIAL

Plaintiff John Baker Orange (“Plaintiff”), individually, by and through his undersigned counsel, brings this class action lawsuit against Ring LLC and Amazon.com, Inc. (collectively, “Defendants,” or “Ring”), on behalf of himself and all others similarly situated, and alleges, based upon information and belief and the investigation of his counsel as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action under the Class Action Fairness Act, 28 U.S.C. § 1332(d)(2) because (a) the aggregated claims of putative class members exceeds \$5 million, exclusive of interest and costs; (b) there are at least hundreds of putative class members; and (c) at least one of the members of the putative class is a citizen of a different state than Defendants.

2. This Court has personal jurisdiction over Defendants because Defendants, directly or through their agents, conduct business in the State of California and within this District. Specifically, Defendant Ring maintains headquarters in this District and operate in this District. Through their business operations in this District, Defendants intentionally avail themselves of the markets within this District to render the exercise of jurisdiction by this Court just and proper.

3. Through its business operations in this District, Defendants intentionally availed themselves of the markets within this District and have sufficient minimum contacts with this State to render the exercise of jurisdiction by this Court just and proper.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a)(1) because a substantial part of the events and omissions giving rise to this action occurred in this

1 District and Ring is headquartered in this District.

2 INTRODUCTION

3 5. Ring is a security and safety company which manufactures, markets and
4 sells alarms, video doorbells, security systems, and cameras. At its core, Ring's
5 products are designed to promote the safety of its customers and to protect their
6 privacy.

7 6. Wi-Fi cameras are among Ring's most popular offerings. They are
8 designed to be strategically placed throughout a property, enabling authorized users to
9 see covered areas in high definition and to communicate directly with occupants via a
10 two-way speaker-microphone system.

11 7. Ring promises its customers "peace of mind" with its Wi-Fi enabled
12 smart security systems. Unfortunately, Ring's cameras fail to deliver on its most basic
13 promise. Lax security standards and protocols render its camera systems vulnerable to
14 cyber-attack. Indeed, over the past several months numerous Ring customers reported
15 that their camera systems had been hacked by malicious third parties who gained
16 access to the video and two-way speaker-microphone system which they used to
17 invade the privacy of customers' homes and terrorize unsuspecting occupants, many
18 of whom are children.

19 8. While Ring quickly attempted to distance itself from liability by blaming
20 customers for failing to create strong security passwords, it is Ring who failed to
21 provide sufficiently robust security measures such as two-factor authentication and
22 other protocols necessary to maintain the integrity and inviolability of its cameras. As
23 a result of Ring's defective design, and its failure to imbue its Wi-Fi cameras with
24 sufficient security protocols, its customers' most basic privacy rights were violated
25 along with the security and sanctity of their homes.

26 9. Plaintiff, on behalf of all others similarly situated, alleges claims for
27 negligence, invasion of privacy, breach of implied contract, breach of implied
28

1 warranty and unjust enrichment. In addition, Plaintiff seeks damages, injunctive and
2 declaratory relief.

3 **PARTIES**

4 10. Plaintiff John Baker Orange is a resident of Jefferson County Alabama.
5 He purchased a Ring outdoor camera for his house in July 2019 for approximately
6 \$249.00. The Ring camera was installed over his garage with a view of the driveway.
7 Mr. Orange purchased the Ring camera to provide additional security for him and his
8 family which include his wife and three children aged 7, 9, and 10. Recently, Mr.
9 Orange's children were playing basketball when a voice came on through the
10 camera's two-way speaker system. An unknown person engaged with Mr. Orange's
11 children commenting on their basketball play and encouraging them to get closer to
12 the camera. Once Mr. Orange learned of the incident, he changed the password on the
13 Ring camera and enabled two-factor authentication. Prior to changing his password,
14 Mr. Orange protected his Ring camera with a medium-strong password.

15 11. Prior to the recent hacking incidents, Mr. Orange was unaware of and
16 believes that Ring did not provide users the ability to secure their systems with two-
17 factor authentication.

18 12. Defendant Ring LLC is a home security and smart home company that
19 manufactures a range of home security products including Wi-Fi enabled smart
20 cameras. Ring LLC is a wholly owned subsidiary of Amazon.com with its place of
21 business located at 1523 26th St, Santa Monica, California 90404.

22 13. Defendant Amazon.com Inc. is a Delaware corporation headquartered at
23 410 Terry Avenue North Seattle, Washington 98109-5210. Ring was acquired by
24 Amazon in February 2018 for an estimated value of between \$1.2 billion and \$1.8
25 billion.

26 **JURISDICTION AND VENUE**

27 14. This Court has subject matter jurisdiction over this action under the Class
28

1 Action Fairness Act, 28 U.S.C. § 1332(d)(2). The amount in controversy exceeds \$5
2 million, exclusive of interest and costs. There are thousands of putative class
3 members, and at least some of whom have a different citizenship from Defendants.

4 15. This Court has jurisdiction over the Defendants which operate in this
5 District. Through their business operations in this District, Defendants intentionally
6 avail themselves of the markets within this District to render the exercise of
7 jurisdiction by this Court just and proper.

8 16. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a)(1) because
9 a substantial part of the events and omissions giving rise to this action occurred in this
10 District and Ring is headquartered in this District.

11 **STATEMENT OF FACTS**

12 ***A. Ring Products and Wi-Fi Connectivity***

13 17. Ring offers a variety of Wi-Fi enabled security and safety devices, most
14 notably video doorbells and cameras. The Ring video doorbell is the company's
15 flagship product. It is a smart doorbell that contains a high-definition camera, a
16 motion sensor, a microphone and speaker for two-way audio communication. It
17 integrates with an associated mobile app, which allows users to view real-time video
18 from the camera, receive notifications when the doorbell is rung, and communicate
19 with visitors at the door via the integrated speaker.

20 18. In 2015, Ring released the first of its internal wireless IP cameras. Like
21 the video doorbell, the cameras provide high definition video and microphone-speaker
22 functionality for two-way communication. Since 2015, Ring has expanded its
23 selection to include a range of indoor and outdoor cameras, each with video and two-
24 way audio communication.¹

25 19. Ring products are designed to operate through a users' Wi-Fi network.

26 _____
27 ¹ <https://support.ring.com/hc/en-us/sections/360006380112-Indoor-Cam>
28

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