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24 **UNITED STATES DISTRICT COURT**  
25 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

26 SONOS, INC.,

27 Plaintiff,

28 v.

GOOGLE LLC,

Defendant.

Case No. 2:20-cv-00169

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff Sonos, Inc. (“Sonos” or “Plaintiff”) hereby asserts the following  
3 claims for patent infringement of United States Patent Nos. 8,588,949, 9,195,258,  
4 9,219,959, 10,209,953, and 10,439,896 (“patents-in-suit”; attached hereto as  
5 Exhibits 1-5 respectively) against Defendant Google LLC (“Google” or  
6 “Defendant”), and alleges as follows:

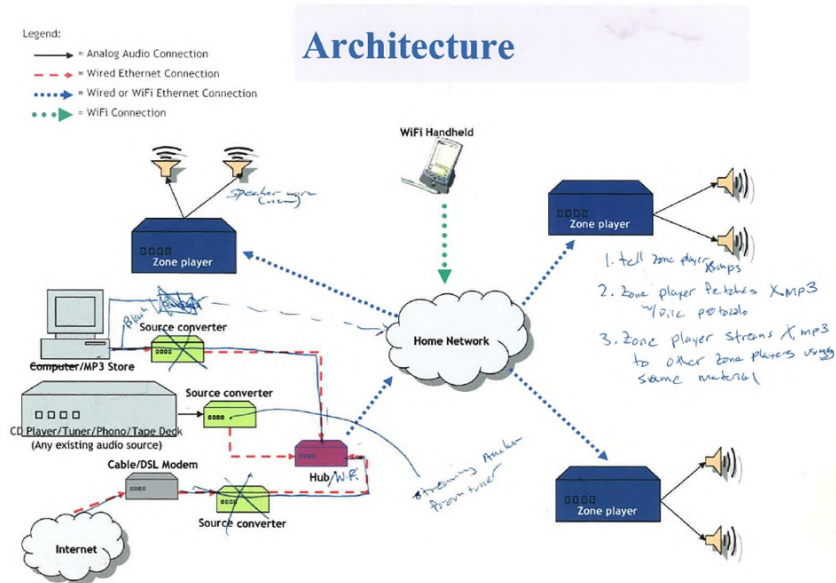
7 **INTRODUCTION**

8 1. In the early 2000s, Sonos pioneered what is known as wireless multi-  
9 room audio, bringing its first commercial products to market in 2005. In  
10 recognition of its wide-ranging innovations, the U.S. Patent & Trademark Office  
11 has granted Sonos more than 750 patents, including the patents-in-suit. The  
12 innovations captured by these patents cover many important aspects of wireless  
13 multi-room audio devices/systems, including, for example, how to set up a playback  
14 device on a wireless local area network, how to manage and control groups of  
15 playback devices (*e.g.*, how to adjust group volume of playback devices and how  
16 to pair playback devices together for stereo sound), and how to synchronize the play  
17 back of audio within groups of playback devices.

18 2. As early as 2013, Google gained knowledge of Sonos’s patented multi-  
19 room technology through a partnership with Sonos to integrate Google Play Music  
20 into the Sonos platform. However, just two years later in 2015, Google began  
21 willfully infringing Sonos’s patents when it launched its first wireless multi-room  
22 audio product – Chromecast Audio. Since 2015, Google’s misappropriation of  
23 Sonos’s patented technology has only proliferated, as Google has expanded its  
24 wireless multi-room audio system to more than a dozen different infringing  
25 products, including, for example, the Google Home Mini, Google Home, Google  
26 Home Max, and Pixel phones, tablets, and laptops. Worse still, Google has  
27 persisted despite the fact that Sonos has warned Google of its infringement on at  
28 least four separate occasions dating back to 2016.



1 7. An early sketch of Sonos's wireless multi-room audio architecture is  
 2 shown below:



15 8. Sonos launched its first commercial products in 2005 and has since  
 16 released a wide variety of wireless multi-room audio products, including, for  
 17 example, the Play:1, Play:3, Play:5 (Gen 1 and Gen 2), One (Gen 1 and Gen 2),  
 18 One SL, Move, Playbar, Playbase, Beam, Sub, Connect, Port, Connect:Amp, and  
 19 Amp. *See, e.g., Ex. 9.* Sonos's products can be set up and controlled by the Sonos  
 app. *Id.*

20 9. A sampling of Sonos's product lineup is shown below.



1           10. Sonos’s products are consistently hailed as setting the standard for the  
2 industry. *See, e.g.*, Ex. 10 (2018 *Digital Trends*: “Sonos is the king of multiroom  
3 audio . . . .”); Ex. 11 (2019 *What Hi-Fi*: “[N]o multi-room offering is as complete  
4 or as pleasurable to live with as Sonos.”).

5           11. Sonos’s products are also compatible with many different third-party  
6 music streaming services and Sonos has entered into partnerships with dozens of  
7 them to integrate their services into the Sonos platform. *See, e.g.*, Ex. 12. For  
8 example, in 2013, Sonos started working closely with Google to integrate the  
9 Google Play Music streaming service and Google Play Music launched on the  
10 Sonos platform in 2014 (with Google’s YouTube Music service added later). *See,*  
11 *e.g.*, Ex. 13. As recognized at the time, Sonos’s integration work with Google was  
12 especially “deep” and gave Google a wide aperture through which to view Sonos’s  
13 proprietary technology. *Id.* (2014 *Wired*: “Now, Google Play Music will be  
14 available as an option to Sonos owners via the Sonos controller app (iOS, Android,  
15 and web). And, for the first time, the Google Play Music Android app is getting  
16 updated with a button that lets users easily play music from any Sonos speaker in  
17 the house. This is the first time this sort of deep integration has happened between  
18 a third party music service and Sonos.”).

19           12. As a pioneer in wireless audio, Sonos has been and continues to be at  
20 the forefront of technological innovation and diligently protects its inventions.  
21 Leading outside organizations have recognized the value of Sonos’s ingenuity. For  
22 example, Sonos earned a spot on the IPO list of “Top 300 Organizations Granted  
23 U.S. Patents” and the IEEE recognized Sonos as having one of “[t]he technology  
24 world’s most valuable patent portfolios.” *See* Exs. 14, 15. Currently, Sonos is the  
25 owner of more than 750 United States Patents related to audio technology, as well  
26 as more than 420 pending United States Patent Applications. Sonos’s patents cover  
27 important aspects of wireless multi-room audio systems, such as setting up a  
28 playback device on a wireless local area network, managing and controlling groups

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