

1 Clement S. Roberts (SBN 209203)
2 *croberts@orrick.com*
3 ORRICK HERRINGTON & SUTCLIFFE LLP
4 405 Howard Street
5 San Francisco, CA 94105
6 Tel: (415) 773-5700 -- Fax: (415) 773-5759

7 Alyssa Caridis (SBN 260103)
8 *acaridis@orrick.com*
9 ORRICK HERRINGTON & SUTCLIFFE LLP
10 777 South Figueroa Street, Suite 3200
11 Los Angeles, CA 90017
12 Tel: (213) 629-2020 -- Fax: (213) 612-2499

13 George I. Lee (*pro hac vice* forthcoming)
14 *lee@ls3ip.com*
15 Sean M. Sullivan (*pro hac vice* forthcoming)
16 *sullivan@ls3ip.com*
17 Rory P. Shea (*pro hac vice* forthcoming)
18 *shea@ls3ip.com*
19 J. Dan Smith (*pro hac vice* forthcoming)
20 *smith@ls3ip.com*
21 LEE SULLIVAN SHEA & SMITH LLP
22 656 W Randolph St, Floor 5W
23 Chicago, IL 60661
24 Tel: (312) 754-0002 -- Fax: (312) 754-0003
25 *Attorneys for Plaintiff Sonos, Inc.*

26 **UNITED STATES DISTRICT COURT**
27 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

28 SONOS, INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 2:20-cv-00169

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

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

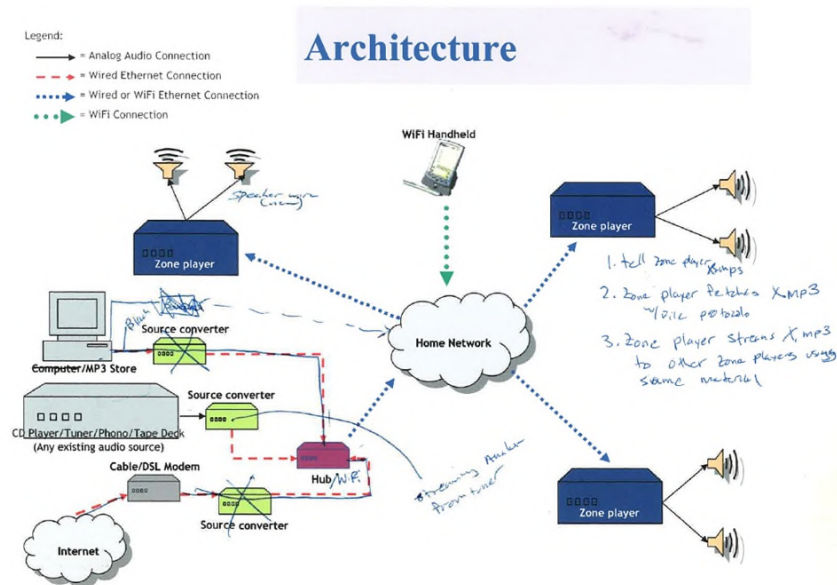
INTRODUCTION

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

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

9 4. Sonos has brought this lawsuit to hold Google accountable for its
10 willful infringement of Sonos's patent rights.

5. Founded in 2002, Sonos invented what is known today as wireless multi-room audio. Ex. 6 (2013 *NBC News*: “If you’re not familiar with Sonos, this company revolutionized the home audio world a decade ago....”); Ex. 7 (2015 *Men’s Journal*: “Sonos almost singlehandedly established the stand-alone wireless home speaker system category....”).



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

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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.