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 individually, and for all others similarly
 8 situated

9
 10 **UNITED STATES DISTRICT COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA**
 12 **WESTERN DIVISION**

13 ALISON WHITE, an individual, on
 behalf of herself and all others
 14 similarly situated,

15 Plaintiff,

16 v.

17
 18 RING LLC, a Delaware Limited
 Liability Company; THE HOME
 19 DEPOT, INC. dba HOME DEPOT
 U.S.A., INC., a Delaware Corporation;
 20 AMAZON.COM SERVICES LLC dba
 AMAZON.COM, INC., a Delaware
 21 Corporation; DOES 1 through 100,
 inclusive,

22 Defendants.
 23
 24
 25
 26

Case No.

**CLASS ACTION COMPLAINT
 FOR VIOLATIONS OF:**

- (1) CONSUMER LEGAL
 REMEDIES ACT, Cal. Civ. Code
 §§ 1750, *et seq.*;
- (2) FALSE ADVERTISING LAW,
 Cal. Bus. & Prof. Code §§ 17500,
et seq.;
- (3) UNFAIR COMPETITION LAW,
 Bus. & Prof. Code §§ 17200, *et
 seq.*;
- (4) NEGLIGENT
 MISREPRESENTATION;
- (5) INTENTIONAL
 MISREPRESENTATION; and
- (6) BREACH OF EXPRESS
 WARRANTY, Cal. Comm. Code
 §§ 2313, *et seq.*

DEMAND FOR JURY TRIAL

TABLE OF CONTENTS

	Page
1	
2 I. INTRODUCTION	1
3 II. NATURE OF THE ACTION	1
4 III. JURISDICTION AND VENUE.....	6
5 IV. PARTIES	7
6 V. FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION	9
7 VI. CLASS ACTION ALLEGATIONS.....	13
8 VII. FIRST CAUSE OF ACTION	17
9	
10 Violations of the California Consumers Legal Remedies Act Cal. Civ. Code §§ 1750, et seq. (On Behalf of the California Subclass)	17
11 VIII. SECOND CAUSE OF ACTION.....	20
12 Violations of California’s False Advertising Law (“FAL”) Bus. & Prof. Code §§ 17500, et seq. (On Behalf of the California Subclass)	20
13 IX. THIRD CAUSE OF ACTION.....	22
14 Violations of California’s Unfair Competition Law (“UCL”) Bus. & Prof. Code §§ 17200, et seq. (On Behalf of the California Subclass)	22
15	
16 “Unlawful” Prong.....	23
17 “Unfair” Prong	24
18 “Fraudulent” Prong.....	25
19 “Unfair, Deceptive, Untrue or Misleading Advertising” Prong	25
20 X. FOURTH CAUSE OF ACTION.....	26
21 Negligent Misrepresentation (On Behalf of the National Class and the California Subclass).....	26
22 XI. FIFTH CAUSE OF ACTION.....	27
23 Intentional Misrepresentation (On Behalf of the National Class and the California Subclass).....	27
24 XII. SIXTH CAUSE OF ACTION.....	29
25 Breach of Express Warranty Cal. Com. Code §§ 2313, et seq. (On Behalf of the National Class and the California Subclass)	29
26 PRAYER FOR RELIEF	31
27	
28	

1 **I. INTRODUCTION**

2 1. Plaintiff ALISON WHITE (“Plaintiff” or “Ms. White”), individually, and
3 on behalf of all others similarly situated, brings this consumer Class Action Complaint
4 against Defendants RING LLC (“Ring”); THE HOME DEPOT, INC. doing business
5 as HOME DEPOT U.S.A., INC. (“Home Depot”); and AMAZON.COM SERVICES
6 LLC doing business as AMAZON.COM, INC. (“Amazon”), and Does 1 through 100
7 inclusive, collectively, “Defendants,” for unlawful, unfair, and deceptive business
8 practices in violation of (1) California’s Consumer Legal Remedies Act, California
9 Civil Code sections 1750, *et seq.*; (2) California’s False Advertising Law, California
10 Business and Professions Code sections 17500, *et seq.*; (3) California’s Unfair
11 Competition Law, California Business and Professions Code sections 17200, *et seq.*;
12 (4) Negligent Misrepresentation; (5) Intentional Misrepresentation; and (6) Breach of
13 Express Warranty, California Commercial Code sections 2313, *et seq.* in response to
14 Defendants’ false and misleading promotion of its security products known as the
15 Jobsite Security 5-Piece Starter Kit and Ring Protect Pro subscription.

16 2. Defendants’ packaging, website, advertisements, and marketing materials
17 associated with Defendant Ring’s Jobsite Security 5-Piece Starter Kit represents to
18 consumers that Jobsite Security Kit, when used in conjunction with a Wi-Fi internet
19 connection and a Pro Subscription with enrollment in “24/7 professional monitoring,”
20 Defendant Ring will automatically “handle it” and “call the authorities and resolve it
21 for you,” when in fact, the Jobsite Security Kit and Pro Subscription are not capable of
22 this advertised functionality. Users must call authorities themselves or instruct
23 Defendant Ring to do so when the users are prompted. Defendants effectively sold
24 purchasers a “911 speed dial” button purchasers can press when purchasers see that
25 their motion sensors have been triggered.

26 **II. NATURE OF THE ACTION**

27 3. Defendants Ring and Amazon manufacture, distribute, market, and sell
28 the Jobsite Security 5-Piece Starter Kit (“Jobsite Security Kit”) to be used in

1 conjunction with Defendant Ring’s Ring Protect Pro subscription (“Pro
2 Subscription”).

3 4. Defendant Home Depot has partnered with Defendants Ring and Amazon
4 to distribute, market, and sell this Jobsite Security Kit. The Jobsite Security Kit is
5 available for purchase exclusively at Defendant Home Depot’s retail stores nationwide
6 and via Defendant Home Depot’s website www.homedepot.com.¹

7 5. Since its release to customers in or around October 2021, the price for the
8 Jobsite Security Kit has been \$399.99, which includes an Alarm Pro Base Station,
9 Stick Up Cam Battery, Motion Sensor, Spotlight Battery, and a Powered Case.

10 6. Defendant Ring advertises the Jobsite Security Kit on its website as “a
11 flexible security system for contractors that adds wifi to your site. Easily move the
12 devices around. Take the system to different sites. And protect your valuable tools and
13 materials from anywhere, anytime.”²

14 7. Defendant Ring’s website markets the Jobsite Security Kit as a device
15 that allows you to “be on the job when you can’t be,” and to “[c]onnect to Ring security
16 cameras, lights, and motion sensors to create an always-on security system, and
17 control it all from the Ring App.”³

18 8. Defendant Ring offers the Pro Subscription, which is a no-contract
19 subscription service available for use with the Jobsite Security Kit that permits
20 subscribers to “[g]et notifications, see what’s happening in real-time, remotely activate
21 your lights or security siren, and control all your Ring devices from one simple
22

23 ¹ Purported affiliate Venue.com holds itself out as an authorized seller of the Jobsite
24 Security Kit. (The Jobsite Security Kit “is authorized for sale under an affiliate
25 agreement with Home Depot and shipped by Home Depot.”)
26 https://venue.com/product/jobsite-security-5-piece-starter-kit/?utm_source=Google-Shopping&utm_medium=WP-cpc&utm_campaign=2022-WP-VENUE-2022&utm_source=google-ads&utm_campaign=utm%20smartshoppinggoogle&utm_agid=138281687430&utm_term=&creative=587433261022&device=c&placement=&gclid=EA1aIQobChMI743n48Ld9gIVBR6tBh3X-ARSEAYYAiABEgKnkFD_BwE (last accessed March 23,
27 2022).
28 ² <https://ring.com/jobsite-security> (last accessed March 24, 2022).

1 dashboard in the Ring App.”⁴ Defendant Ring markets the subscription as “a
2 comprehensive subscription service that lets you review, share, and save every video
3 and photo captured by your Ring device and opt-in to 24/7 professional monitoring.”⁵
4 In reference to “24/7 professional monitoring,” Defendant Ring provides that “Ring
5 Alarm Pro and Ring Alarm professional monitoring service is available only within
6 the U.S. (all 50 states, but not U.S. territories). Ring does not own its own professional
7 monitoring center. Additional charges may apply in areas that require permits or guard
8 response service for alarm verification. Tax not included. Enrollment required.”⁶

9 9. The current price for the Pro Subscription is \$20 per month if purchased
10 on a monthly basis or \$200 per year with an annual purchase.

11 10. The packaging of the Jobsite Security Kit also advertises that, when used
12 in conjunction with a Wi-Fi internet connection and a Pro Subscription with
13 enrollment in “24/7 professional monitoring,” Defendant Ring will “handle it” and
14 “call the authorities and resolve it for you.”² Footnote 2 states in pertinent part, “Ring
15 Alarm Pro and Ring Alarm professional monitoring service is available within the
16 U.S. (all 50 states, but not U.S. territories). Ring does not own its own professional
17 monitoring center. Additional charges may apply in areas that require permits or guard
18 response service for alarm verification. Tax not included. Enrollment for Ring Protect
19 Pro and opt-in for professional monitoring is required (each separately).”⁷

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21
22 ⁴ https://ring.com/protect-plans?utm_source=google&utm_medium=cpc&utm_campaign=833107590&utm_term=ring%20doorbell%20subscription%20plans&utm_content=66897173502&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE (last
23 accessed March 23, 2022).

24 ⁵ https://ring.com/protect-plans?utm_source=google&utm_medium=cpc&utm_campaign=833107590&utm_term=ring%20doorbell%20subscription%20plans&utm_content=66897173502&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE&gclid=EAIaIQobChMIInsLXpb3d9gIVmxitBh0t_QvmEAAAYAiAAEgJTI_D_BwE (last
25 accessed March 23, 2022).

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28 ⁶ *Id.*

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