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12 Attorneys for GOOGLE LLC

13 UNITED STATES DISTRICT COURT  
14  
15 NORTHERN DISTRICT OF CALIFORNIA

16 GOOGLE LLC,  
17 Plaintiff,  
18 vs.  
19 SONOS, INC.,  
20 Defendant.

CASE NO. 3:20-cv-6754

**COMPLAINT FOR DECLARATORY  
JUDGMENT OF NON-INFRINGEMENT  
OF U.S. PATENT NOS. 9,967,615;  
10,779,033; 9,344,206; 10,469,966; AND  
9,219,460**

**DEMAND FOR JURY TRIAL**

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23  
24 **COMPLAINT FOR DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF U.S.**

25 **PATENT NOS. 9,967,615; 10,779,033; 9,344,206; 10,469,966; AND 9,219,460**

26 1. Plaintiff Google LLC (“Google”) seeks a declaratory judgment of non-infringement  
27 of United States Patent Nos. 9,967,615; 10,779,033; 9,344,206; 10,469,966; and 9,219,460 as  
28

1 **NATURE OF THE ACTION**

2 2. This is an action for a declaratory judgment of non-infringement arising under the  
3 patent laws of the United States, Title 35 of the United States Code. Google requests this relief  
4 because Defendant Sonos, Inc. (“Sonos”) claims that Google infringes United States Patent Nos.  
5 9,967,615 (“the ’615 patent”); 10,779,033 (“the ’033 patent”); 9,344,206 (“the ’206 patent”);  
6 10,469,966 (“the ’966 patent”); and 9,219,460 (“the ’460 patent”) (collectively, the “Patents-in-  
7 Suit”) by making, using, selling, offering for sale, and/or importing the following products:  
8 Chromecast, Chromecast Ultra, Chromecast Audio, Chromecast with Google TV, Home Mini,  
9 Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Audio, Nest Wifi  
10 Point, YouTube Music app, Google Play Music app, YouTube app, Google Home app, and  
11 Google’s “Pixel” phones, tablets, and laptops (collectively, “Google Accused Products”). Sonos’  
12 litigation campaign has harmed the reputations of these Google Accused Products; and Sonos’  
13 affirmative allegations of infringement of the Patents-in-Suit by the Google Accused Products has  
14 created a justiciable controversy between Google and Sonos.

15 3. As a result of Sonos’ communication to Google of its intention to pursue claims of  
16 infringement of the Patents-in-Suit against Google, Google is under reasonable apprehension of  
17 suit by Sonos.

18 **THE PARTIES**

19 4. Plaintiff Google LLC is a subsidiary of Alphabet Inc. with its principal place of  
20 business located at 1600 Amphitheatre Parkway, Mountain View, California 94043.

21 5. Defendant Sonos, Inc. is a Delaware corporation with headquarters at 614 Chapala  
22 Street, Santa Barbara, California 93101.

23 **JURISDICTIONAL STATEMENT**

24 6. This action arises under the Declaratory Judgment Act, 28 U.S.C. § 2201, and  
25 under the patent laws of the United States, 35 U.S.C. §§ 1-390.

26 7. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331,  
27 1338(a), and 2201(a).

28



1 and acquisitions of other cutting-edge technology companies. Google is the current assignee of  
2 tens of thousands of patents worldwide.

3 15. Google partners with other companies to bring Google's innovations to millions of  
4 shared customers. In particular, Google has long had a continued partnership with Sonos. In these  
5 collaborations, Sonos has repeatedly asked Google for assistance, so that Sonos could employ  
6 Google technology to improve Sonos' products.

7 16. In 2013, Sonos asked for Google's assistance to integrate with Google's popular  
8 Play Music service. Google gave Sonos that assistance, and provided significant engineering  
9 resources, technical support, and other resources to integrate Sonos' products with Google's Play  
10 Music service in 2014.

11 17. In 2016, Sonos again asked for Google's assistance—this time to integrate with  
12 Google's innovative Assistant software. And again, Google was willing to help. Google gave  
13 Sonos significant assistance in designing, implementing, and testing a solution that would bring  
14 Google's voice recognition software to Sonos' devices. This effort again involved substantial  
15 Google engineering resources, including significant months of employee work time, for the initial  
16 launch of Google's Assistant on Sonos' products in May 2019.

17 18. Google is proud of its more than five-year partnership with Sonos, and has worked  
18 constructively with Sonos to make the companies' products work seamlessly by building special  
19 integrations for Sonos. For instance, when Google rolled out the ability to set a Sonos speaker as  
20 the default option for Google Assistant, it was the first time Google had done that for any partner  
21 company.

22 19. Sonos has made false claims about the companies' shared work and Google's  
23 technology in lawsuits that Sonos filed against Google earlier this year. The parties are also  
24 engaged in an additional litigation here in the Northern District of California, Case No. C 3-20-cv-  
25 03845-EMC.

26 **GOOGLE DOES NOT INFRINGE THE PATENTS-IN-SUIT**

27 20. The Google Accused Products do not directly or indirectly infringe any claim of the  
28 Patents-in-Suit, literally or under the doctrine of equivalents.



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