

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)  
charlesverhoeven@quinnemanuel.com

50 California Street, 22nd Floor  
San Francisco, California 94111

Telephone: (415) 875-6600

David A. Nelson (*pro hac vice* application forthcoming)  
davenelson@quinnemanuel.com

191 N. Wacker Dr., Suite 2700  
Chicago, IL 60606

Telephone: (312) 705-7400

Patrick D. Curran (Bar No. 241630)  
patrickcurran@quinnemanuel.com

Quinn Emanuel Urquhart & Sullivan, LLP  
111 Huntington Ave, Suite 520

Boston, MA 02199

Telephone: (617) 712-7100

S. Alex Lasher (*pro hac vice* application forthcoming)  
alexlasher@quinnemanuel.com

Jeffrey Gerchick (*pro hac vice* application forthcoming)  
jeffgerchick@quinnemanuel.com

Nina S. Tallon (*pro hac vice* application forthcoming)  
ninatallon@quinnemanuel.com

1300 I Street, NW, Suite 900

Washington, D.C. 20005

Telephone: (202) 538-8000

Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GOOGLE LLC,

Plaintiff,

vs.

SONOS, INC.,

Defendant.

CASE NO. 22-4553

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

1                                    **COMPLAINT FOR PATENT INFRINGEMENT**

2            1.        Plaintiff Google LLC (“Google”), by and through its attorneys, and for its  
3 Complaint against Sonos, Inc. (“Sonos”), hereby alleges the following:

4                                    **NATURE OF THE ACTION**

5            2.        Google brings this action against Sonos for infringement of U.S. Patent No.  
6 11,024,311 (the “’311 patent”), U.S. Patent No. 9,812,128 (the “’128 patent”), U.S. Patent No.  
7 9,632,748 (the “’748 patent”), and U.S. Patent No. 11,050,615 (the “’615 patent”) (collectively,  
8 the “Asserted Patents”).

9                                    **BACKGROUND**

10          3.        Google was founded in 1998, and has a mission to organize the world’s  
11 information and make it universally accessible and useful. Over the past two decades, in service of  
12 that mission, Google has become one of the world’s most innovative technology companies.  
13 Google’s revolutionary advances in search, computing, software, hardware, and voice-assisted  
14 technologies have resulted in improved services for millions of people worldwide.

15          4.        As part of its commitment to innovation, Google has invested significantly in  
16 extensive research and development efforts. Google is the current assignee of tens of thousands of  
17 patents worldwide.

18          5.        Google has pioneered advances at the heart of modern technology. Google’s  
19 innovative voice-activated Google Assistant has transformed smart device management, connected  
20 homes, and mobile computing, and Google’s innovations in multi-device management for voice  
21 control and device commissioning have made smart-home technology a user-friendly component  
22 of modern electronics. Google’s innovations are key components for modern smart-home  
23 technologies.

24          6.        Google makes its innovative technology available to users worldwide, and also to  
25 other companies – even providing its Google Assistant software to Sonos for many years. Google  
26 engineers have worked for years assisting and instructing Sonos engineers on the implementation  
27 of voice recognition and voice-activated device controls in Sonos’s products. This software and  
28

1 know-how, which Google provided to Sonos in the spirit of partnership and collaboration, helped  
2 drive demand for Sonos products.

### 3 **GOOGLE'S PARTNERSHIP WITH SONOS**

4 7. Google partners with other companies to bring Google's innovations to millions of  
5 shared customers. In particular, Google has long had a continued partnership with Sonos. In these  
6 collaborations, Sonos has repeatedly asked Google for assistance, so that Sonos could employ  
7 Google technology to improve Sonos's products. In 2013, Sonos asked for Google's assistance to  
8 integrate with Google's popular Play Music service. Google gave Sonos that assistance, and  
9 provided significant engineering resources, technical support, and other resources to integrate  
10 Sonos's products with Google's Play Music service in 2014.

11 8. 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's 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's products in May 2019.

17 9. Google is proud of its multi-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 10. Sonos has made false claims about the companies' shared work and Google's  
23 technology in the lawsuits that Sonos filed against Google. While Google rarely sues other  
24 companies for patent infringement, it must assert its intellectual property rights here.

### 25 **SONOS'S INFRINGEMENT OF GOOGLE'S INTELLECTUAL PROPERTY**

26 11. Google has patented inventions on innovative technologies for enabling voice  
27 assistant technology and that improve ease of use for smart home devices. Sonos is using, without  
28 permission, these Google technologies in its products to enable multiple commercially-desirable

1 features. For example, Sonos has recently introduced its Sonos Voice Control feature to  
2 coordinate among voice-controlled devices and commission devices onto a wireless local area  
3 network, using technologies invented by Google. Sonos uses these technologies in a number of its  
4 products, including the Sonos One, Sonos One SL, Sonos Move, Sonos Roam, Sonos Roam SL,  
5 Sonos Five, Sonos Arc, Sonos Beam, and Sonos Ray.

6 12. Google's patented innovations are fundamental to the ability of Sonos's products to  
7 work together as user-friendly smart devices. Sonos acknowledges that for its products, "the real  
8 magic is in the software," and not in the "look and sound" of its speakers. *See* Ex. 5, (retrieved  
9 August 3, 2022), available at [https://jobs.mindtheproduct.com/?post\\_type=job\\_listing&p=10065](https://jobs.mindtheproduct.com/?post_type=job_listing&p=10065).  
10 Sonos freely admits as much on its own tech blog:

11 Our software is the "magic."

12  
13 If you've used Sonos before, you know that the Sonos  
14 experience is more than just sounds coming from a speaker. It's  
15 the seamlessness of moving from room to room while listening to  
16 your favorite true crime podcast. It's the ease of asking your voice  
assistant to turn down the volume or convert ounces to cups while  
you're cooking. And it's the joy of soundtracking a picnic with a  
collaborative playlist on a speaker that weighs less than a pound.

17 None of this would be possible without the hard-working  
18 software inside our speakers and components. "There's a  
19 perception that we're a hardware company because everything we  
20 sell is hardware," says Jim Dolan, Vice President, Software  
Development. "And the hardware is beautiful. It's amazing. But  
*the magic of the system is the software*. The speaker itself does  
not enable the system; the software enables the system."

21 See Ex. 6, "5 Things We Want To Share With Our Future SVP, Software" (retrieved June  
22 20, 2022), available at [https://tech-blog.sonos.com/posts/things-we-want-to-share-with-our-future-](https://tech-blog.sonos.com/posts/things-we-want-to-share-with-our-future-svp-software/)  
23 [svp-software/](https://tech-blog.sonos.com/posts/things-we-want-to-share-with-our-future-svp-software/) (emphasis added). This software "magic" uses patented Google technology, and  
24 Google brings this case to defend that technology from Sonos's infringement.

25 13. Sonos is actively infringing Google's intellectual property, and is not licensed to  
26 use Google's patented inventions to implement the accused features described in this Complaint.  
27 Accordingly, Google has filed this suit to protect its intellectual property.  
28

**THE PARTIES**

14. Plaintiff Google LLC is a subsidiary of Alphabet Inc. with its principal place of business located in Mountain View, California.

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

**JURISDICTION AND VENUE**

16. This is a civil action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive subject matter jurisdiction over this Complaint pursuant to 28 U.S.C. Sections 1331 and 1338(a).

17. This Court has personal jurisdiction over Sonos. Sonos is registered to do business in the State of California (Registration No. C2465272), has its headquarters in the State of California, and has offices in this District. Sonos, directly and through agents, regularly does, solicits, and transacts business in this District and elsewhere in the State of California. Those acts have caused injury to Google, including within this District.

18. Venue is proper in this District under 28 U.S.C. Sections 1391 and 1400(b). Sonos has a regular and established place of business in this District—specifically, offices and employees located at 550 Montgomery Street, Suite 750, San Francisco, CA 94111. Sonos lists this San Francisco office on its website (<https://www.sonos.com/en-us/contact>, a true and correct copy of which is attached as Exhibit 7), and the Sonos office at this location is advertised by Sonos as a current place of business (including in the building's directory in the public lobby). Sonos has also committed acts of infringement in this District by selling, using, importing, and/or offering for sale its infringing products in this District.

**INTRADISTRICT ASSIGNMENT**

19. For purposes of intradistrict assignment under Civil Local Rules 3-2(c) and 3-5(b), this Intellectual Property Action will be assigned on a district-wide basis.

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