

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IPA TECHNOLOGIES INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff IPA Technologies Inc. (“IPA”) as and for its complaint against Google LLC (“Google” or “Defendant”) alleges as follows:

PARTIES

1. IPA is a Delaware corporation with a principal place of business at 600 Anton Blvd., Suite 1350, Costa Mesa, California 92626.
2. On information and belief, Defendant Google LLC is a Delaware limited liability company with a principal place of business at 1600 Amphitheatre Parkway, Mountain View, California. Google may be served with process through its registered agent, the Corporation Service Company, 251 Little Falls Drive, Wilmington, Delaware 19808.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. Accordingly, this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has specific and general personal jurisdiction over Defendant pursuant to due process and/or the Delaware Long Arm Statute, due to Defendant having availed itself of the rights and benefits of Delaware by incorporating under Delaware law and due to its substantial business in this forum, including: (i) at least a portion of the infringement alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Delaware and in this Judicial District.

5. Venue is proper in this District under 28 U.S.C. §§ 1391 (b)-(c) and 1400(b) because Defendant is resident in this District as it is incorporated in Delaware.

BACKGROUND

6. SRI International, Inc. (“SRI”), the original owner of the patents-in-suit, is an independent, not-for-profit research institute that conducts client-supported research and development for government agencies, commercial businesses, foundations, and other organizations.

7. SRI employs about 2,100 people worldwide, including scientists, engineers, technologists, policy researchers, and corporate and support staff. SRI works with clients to take the most advanced R&D from the laboratory to the marketplace. SRI collaborates across technical and scientific disciplines to generate real innovation and create value by inventing solutions that solve challenging problems and looks ahead to the needs of the future. For more than 70 years, SRI has led the discovery and design of ground-breaking products, technologies, and industries—from the computer mouse and intelligent personal assistants to robotic surgery, medical ultrasound, cancer treatments, and more. The revenue generated by SRI’s R&D projects, commercialization activities,

and marketplace solutions is reinvested in SRI capabilities, facilities, and staff to advance its mission.

8. Among its many areas of research, SRI has engaged in fundamental research and development related to intelligent personal assistants and speech-based navigation of electronic data sources.

9. SRI's innovative work on personal digital assistants was a key area of development in one of the world's largest artificial intelligence projects, the Cognitive Assistant that Learns and Organizes ("CALO"). The vision for the SRI-led CALO project, which was funded by the U.S. Defense Advanced Research Projects Agency ("DARPA"), was to create groundbreaking software that could revolutionize how computers support decision-makers.

10. SRI's work on personal digital assistants and speech-based navigation of electronic data sources, which started before the launch of the CALO project, developed further as part of the project. SRI's engineers were awarded numerous patents on their groundbreaking personal digital assistant and speech-based navigation inventions.

11. To bring the personal digital assistant and speech-based navigation technology to the marketplace, SRI formed the spin-off company Siri, Inc. in 2007, and granted it a non-exclusive license to the patent portfolio. The technology was demonstrated as an iPhone app at technology conferences and later released as an iPhone 3GS app in February 2010. In April 2010, Apple Inc. acquired Siri, Inc. In 2011, the Siri personal digital assistant was released as an integrated feature of the iPhone 4S.

12. Intelligent personal assistants and speech-based navigation of electronic data sources have continued to be implemented as effective and user-friendly solutions for interacting with electronic devices.

13. On May 6, 2016, IPA acquired the SRI patent portfolio at issue here. IPA is a wholly-owned subsidiary of WiLAN, a leading technology innovation and licensing business actively engaged in research, development, and licensing of new technologies.

INVENTOR BACKGROUNDS

14. Co-inventor Adam Cheyer is today a recognized thought leader in the field of artificial intelligence. After obtaining his computer science degree from Brandeis University and his MS in Computer Science and Artificial intelligence (“AI”), Mr. Cheyer served as a researcher in Artificial Intelligence at SRI International. He authored more than 60 publications and 26 issued patents. He was Chief Architect of CALO, the largest AI project in US history. Previously, he was co-founder and VP Engineering of Siri, a mobile phone virtual personal assistant. As a startup, Siri won the Innovative Web Technologies award at SXSW, and was chosen as a Top Ten Emerging Technology by MIT’s Technology Review before Apple purchased Siri in 2010. He is currently co-founder and VP Engineering of Viv Labs, whose goal is to simplify the world by providing an intelligent interface to everything. Viv Labs is now a wholly-owned subsidiary of Samsung.

15. Co-inventor Dr. Luc Julia is named one of the top 100 most influential French developers in the digital world. After receiving his Ph.D. in Multimodal Human-Computer Interfaces from the Ecole Nationale Superieure de Telecommunications in Paris, France, Dr. Julia worked at SRI, where he studied agent architectures, co-founded

Nuance Communications (a world leader in speech recognition), and served as co-founder and director of the Computer Human Interactive Center (CHIC!). He was also Chief Technologist at Hewlett-Packard Company, and Director of Siri at Apple, Inc. He now serves as VP of Innovation at Samsung Electronics' Strategy and Innovation Center.

16. Co-inventor Christine Halverson obtained her MS and Ph.D. in Cognitive Science while working at NASA's Ames Research Center building next-generation air traffic control software. She worked for SRI as an Interim Program Director of SRI's CHIC! Most recently she has served at IBM as a researcher at the Thomas J. Watson Research Center for a total of 16 years in the areas of human computer interaction, and the PERCS (Productive Easy-to-Use Reliable Computing System) program, which was part of a DARPA challenge in the High Performance Computing System (HPCS) mandate to develop a peta-scale computer.

17. Co-inventor Dimitris Voutsas has a Masters in Computer Science and worked as a Research & Development Engineer at SRI's CHIC! For the last twelve years he has served at Microsoft as a Project Manager for Windows and Windows Phone, and currently serves as Senior Program Manager for Microsoft's Bing.

18. Co-inventor David L. Martin worked as a Senior Computer Scientist at the Artificial Intelligence Center of SRI International for over 16 years, and worked as the Senior Manager for Applications Engineering at Siri Inc. and later as an Engineering Manager at Apple Inc. upon Apple's acquisition of Siri. Since August 2013, he has served as the Senior Research Scientist at Nuance Communications, focusing on artificial intelligence research.

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