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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MARY AND MATTHEW STREET,

Plaintiffs,

v.

AMAZON.COM SERVICES, INC., a Delaware  
Corporation; AMAZON DIGITAL SERVICES,  
INC., a Delaware Corporation,

Defendants.

NO.

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

1 **COMPLAINT**

2 Plaintiffs Mary and Matthew Street (“Plaintiffs” and/or the “Street Plaintiffs”), on their  
3 own behalf and on behalf of all others similarly situated (“Class Members”), bring this class  
4 action against Amazon.com Services, Inc. and Amazon Digital Services, Inc. (collectively  
5 “Amazon” or “Defendants”) and complain and allege the following upon personal knowledge  
6 as to their own experiences, and based upon on information and belief as to other matters:

7 **INTRODUCTION**

8 1. Amazon is building an unprecedented national wireless network but making its  
9 consumers foot the bill. This action seeks to right that wrong.

10 2. This is a class action lawsuit brought against Amazon by Plaintiffs individually,  
11 and on behalf of similarly situated consumers who purchased Amazon Echo smart speakers and  
12 Ring security camera systems equipped with Amazon’s Sidewalk network (referred to herein as  
13 “Sidewalk Devices”).

14 3. Amazon manufactured, marketed, and sold the Echo and Ring devices.<sup>1</sup>  
15 Embedded within Sidewalk Devices is a technology that enables those Sidewalk Devices to  
16 connect to other Echo and Ring devices nearby through their Bluetooth connections, creating a  
17 new, shared network.<sup>2</sup> Together, these connections create a stronger “mesh” network with long-  
18 range connectivity that would otherwise be expensive to create.

19 4. Amazon bypasses the expense of creating such an expensive network, however,  
20 by having Sidewalk tap into Plaintiffs’ and Class Members’ private Internet connections, using  
21 portions of their Internet bandwidth to maintain connections between the Sidewalk Devices.

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24 \_\_\_\_\_  
25 <sup>1</sup> Geoffrey A. Fowler, *Amazon is about to share your Internet connection with neighbors. To*  
26 *turn it off, you’ll have to dig through some settings*, WASHINGTON POST, (June 8, 2021, 11:07  
27 AM), <https://www.washingtonpost.com/technology/2021/06/07/amazon-sidewalk-network/>,  
<https://apple.news/AP7vHVBq5SseZ-9EkFrmT3w>.

<sup>2</sup> *Id.*

1 5. Amazon activated Sidewalk on or about June 8, 2021, automatically connecting  
2 its Sidewalk Devices by default without first seeking consumers' consent to share their Internet  
3 bandwidth.

4 6. As a result of Amazon's unfair, deceptive, and/or fraudulent business practices,  
5 owners of Sidewalk Devices, including Plaintiffs and Class Members, have suffered an  
6 ascertainable loss and injury in fact; are at imminent risk of future harm, including increased  
7 risk to the security of their personal data; and otherwise have been harmed by Amazon's  
8 conduct.

9 7. Accordingly, Plaintiffs bring this action, on behalf of themselves and the Class,  
10 to redress Amazon's violations of the Washington Consumer Protection Act, RCW §§  
11 19.86.010, *et seq.*, and RCW § 9A.56.262. Plaintiffs seek monetary relief for damages suffered,  
12 costs of suit, including reasonable attorney fees and public injunctive relief.

13 **JURISDICTION AND VENUE**

14 8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.  
15 § 1332 of the Class Action Fairness Act of 2005 because: (i) there are 100 or more class  
16 members, (ii) there is an aggregate amount in controversy exceeding \$5,000,000, exclusive of  
17 interest and costs, and (iii) there is minimal diversity because at least one plaintiff and one  
18 defendant are citizens of different states. This Court also has supplemental jurisdiction over the  
19 state law claims pursuant to 28 U.S.C. § 1367.

20 9. Venue properly lies in this judicial district pursuant to 28 U.S.C. § 1391 because  
21 a substantial portion of the conduct described in this Complaint was carried out in this district.  
22 Furthermore, Amazon is headquartered and has a principal place of business in this district,  
23 subjecting Defendants to personal jurisdiction in this district.

24 10. The Court may exercise personal jurisdiction over Defendants because they  
25 maintain headquarters within this judicial district; are registered to conduct business in this  
26 judicial district; have designated an agent for service of process in this judicial district; have  
27

1 employees located in this judicial district; list their address as within this judicial district; and  
2 intentionally and purposefully placed its products and services into the stream of commerce  
3 within the state of Washington and throughout the United States. The exercise of personal  
4 jurisdiction over Defendants in Washington would not offend traditional notions of fair play  
5 and substantial justice.

#### 6 THE PARTIES

7 11. Plaintiffs Matthew and Mary Street are husband and wife, and citizens of the  
8 state of Florida, residing in Miami-Dade County.

9 12. On or about October 9, 2018, Mr. and Mrs. Street became owners of an “Echo  
10 Dot,” third generation, for personal, family, or household use.

11 13. The Street Plaintiffs pay Comcast for personal Internet bandwidth on a monthly  
12 basis.

13 14. The Street Plaintiffs did not consent to share their personal Internet bandwidth for  
14 the Sidewalk network.

15 15. Plaintiffs are informed and believe and thereon allege that Defendants  
16 Amazon.com Services, Inc. and Amazon Digital Services, Inc. are incorporated in the state of  
17 Delaware and maintain their business headquarters at 410 Terry Ave N, Seattle, WA 98103.

#### 18 FACTUAL ALLEGATIONS

19 16. Defendant Amazon.com Services, Inc. is “a vast Internet-based enterprise that  
20 sells books, music, movies, housewares, electronics, toys, and many other goods, either directly  
21 or as a middleman between other retailers and Amazon.com’s millions of customers.”<sup>3</sup>

22 17. Amazon.com Services Inc.’s Prime delivery and streaming services exceed 200  
23 million global customers.<sup>4</sup>

24  
25 <sup>3</sup> Mark Hall, *Amazon.com*, BRITANNICA, <https://www.britannica.com/topic/Amazoncom> (last  
visited June 25, 2021).

26 <sup>4</sup> *Fortune 500: Amazon – Rank 2*, FORTUNE, [https://fortune.com/company/amazon-](https://fortune.com/company/amazon-com/fortune500/)  
27 [com/fortune500/](https://fortune.com/company/amazon-com/fortune500/) (last visited Jun 25, 2021).

1 18. Amazon.com Services Inc. has grown from being an online book retailer to the  
2 world's largest and most influential e-commerce platform with net sales of more than \$280  
3 billion in 2019.<sup>5</sup>

4 19. Defendant Amazon Digital Services Inc.'s "business includes renting data  
5 storage and computing resources, so-called 'cloud computing,' over the Internet."<sup>6</sup>

6 20. Amazon Digital Services Inc. is now also one of the largest providers of cloud  
7 computing services, powering 42% of the Internet through Amazon Web Services.<sup>7</sup>

8 21. In January 2019, Amazon became "the most valuable company on the planet,"  
9 worth almost \$810 billion.<sup>8</sup>

10 22. Amazon also developed the voice-controlled, personal, artificial intelligence,  
11 assistant technology known as Alexa.

12 23. The Alexa application allows users the ability to connect to online music  
13 services, provide weather and news updates, and view shopping lists and calendars, among  
14 other services.

15 24. The Amazon Echo is a platform for Alexa. Its voice-controlled smart speaker  
16 connects to consumers' Wi-Fi Internet connections to provide voice control to connected  
17 mobile devices through Bluetooth technology. The Echo is also equipped with Alexa. Certain  
18 Echo devices are equipped with Sidewalk.

19 25. Amazon Ring devices are smart security products, including a video doorbell  
20 that allows Ring users to see, speak to, and record people at their doorsteps or other home  
21 areas. Certain Ring devices are equipped with Sidewalk.

22 <sup>5</sup> Form 10-K, Amazon.com, Inc., [https://d18rn0p25nwr6d.cloudfront.net/CIK-  
23 0001018724/4d39f579-19d8-4119-b087-ee618abf82d6.pdf](https://d18rn0p25nwr6d.cloudfront.net/CIK-0001018724/4d39f579-19d8-4119-b087-ee618abf82d6.pdf).

24 <sup>6</sup> Hall, *supra*, <https://www.britannica.com/topic/Amazoncom>.

25 <sup>7</sup> Matt Ward, *Amazon: The Company Consuming Consumers*, [https://mattward.io/amazon-the-  
26 company-consuming-consumers/](https://mattward.io/amazon-the-company-consuming-consumers/) (last accessed June 16, 2021).

27 <sup>8</sup> Paul R. La Monica, *Amazon Is Now the Most Valuable Company on the Planet*, CNN, (Jan, 8,  
2019, 11:27 A.M.), [https://www.cnn.com/2019/01/08/investing/amazon-most-valuable-  
company-microsoft-google-apple/index.html](https://www.cnn.com/2019/01/08/investing/amazon-most-valuable-company-microsoft-google-apple/index.html).

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