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18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 GOOGLE LLC,

21 Plaintiff,

22 vs.

23 SONOS, INC.,

24 Defendant.

CASE NO. 22-4553

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

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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."

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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.  
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1 **THE PARTIES**

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

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

6 **JURISDICTION AND VENUE**

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

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

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

23 **INTRADISTRICT ASSIGNMENT**

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

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**FIRST CAUSE OF ACTION**

**(Infringement of U.S. Patent No. 11,024,311)**

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3 20. Google incorporates and realleges all of the above paragraphs as though fully set  
4 forth herein.

5 21. U.S. Patent No. 11,024,311, titled “Device Leadership Negotiation Among Voice  
6 Interface Devices,” was duly and lawfully issued by the United States Patent and Trademark  
7 Office on June 1, 2021, and is assigned to Google LLC. A true and correct copy of the ’311 patent  
8 is attached to this Complaint as Exhibit 1.

9 22. Google is the owner of all rights, title, and interest in the ’311 patent, including the  
10 right to bring this suit for past and future damages and/or injunctive relief.

11 23. The ’311 patent is valid and enforceable.

12 24. Sonos infringes one or more claims of the ’311 patent, including but not limited to  
13 claims 1-3, 8-12, 14-18, and 20 (the “Asserted ’311 Claims”), directly and/or indirectly via  
14 induced infringement and/or by contributory infringement. Sonos infringes the Asserted ’311  
15 Claims by making, using, offering to sell, importing, selling for importation, and/or selling after  
16 importation into the United States at least Sonos audio player products that include one or more  
17 microphones and support Sonos Voice Control, including the Sonos One, Sonos Move, Sonos  
18 Roam, Sonos Arc, and Sonos Beam (collectively, the “Accused Voice Products”) in violation of  
19 35 U.S.C. §§ 271(a)-(c). On information and belief, the Accused Voice Products satisfy all claim  
20 limitations of the asserted claims at the time of importation into and/or sale in the United States.

21 25. Sonos had knowledge of the ’311 patent by no later than the filing of this action.

22 26. Sonos directly infringes the Asserted ’311 Claims by making, using, offering to  
23 sell, or selling the Accused Voice Products in the United States and by importing the Accused  
24 Voice Products into the United States in violation of 35 U.S.C. Section 271(a). A claim chart  
25 illustrating Sonos’s infringement of independent claims 1, 10, and 16 of the ’311 patent for a  
26 representative Accused Voice Product is attached as Exhibit 8.

27 27. Sonos actively, knowingly, and intentionally induces the infringement of the  
28 Asserted ’311 Claims by actively encouraging others to make, use, offer to sell, or sell the

1 Accused Voice Products in the United States and/or import the Accused Voice Products into the  
2 United States in violation of 35 U.S.C. Section 271(b). By at least the filing of this Complaint,  
3 Sonos knows (or should know) that its actions will induce (and do induce) users of the Accused  
4 Voice Products to directly infringe the Asserted '311 Claims. For example, Sonos promotes  
5 Sonos Voice Control as providing “[f]ast, accurate control of your music and your Sonos System,”  
6 and as being available “on new voice capable products and as a free update for existing  
7 customers.” Ex. 17 (retrieved August 3, 2022), available at [https://www.sonos.com/en-](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening)  
8 [us/newsroom/introducing-effortless-listening](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening).

9         28. Sonos contributorily infringes the Asserted '311 Claims by offering to sell or  
10 selling within the United States or importing into the United States the Accused Voice Products  
11 (where each of the Accused Voice Products is or contains a component of a patented machine,  
12 manufacture, combination or composition, or a material or apparatus for use in practicing a  
13 patented process, constituting a material part of the invention), knowing, by at least the filing of  
14 this Complaint, the same to be especially made or especially adapted for use in infringing the '311  
15 patent, and not a staple article or commodity of commerce suitable for substantial non-infringing  
16 use in violation of 35 U.S.C. Section 271(c).

17         29. Sonos's continued infringement of the '311 patent is willful and deliberate because  
18 it knows of the '311 patent and the infringement of that patent no later than the filing of this  
19 action, but continues to act despite an objectively high likelihood that such acts will result in  
20 infringement of the patent.

21         30. As the direct and proximate result of Sonos's conduct, Google has suffered and, if  
22 Sonos's conduct is not stopped, will continue to suffer, competitive harm, irreparable injury, and  
23 damages in an amount to be proven at trial. Because Google's remedy at law is inadequate,  
24 Google seeks, in addition to damages, permanent injunctive relief. Google's business operates in  
25 a competitive market and will continue suffering irreparable harm absent injunctive relief.

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**SECOND CAUSE OF ACTION**

**(Infringement of U.S. Patent No. 9,812,128)**

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3 31. Google incorporates and realleges all of the above paragraphs as though fully set  
4 forth herein.

5 32. U.S. Patent No. 9,812,128, titled “Device Leadership Negotiation Among Voice  
6 Interface Devices,” was duly and lawfully issued by the United States Patent and Trademark  
7 Office on November 7, 2017, and is assigned to Google LLC. A true and correct copy of the ’128  
8 patent is attached to this Complaint as Exhibit 2.

9 33. Google is the owner of all rights, title, and interest in the ’128 patent, including the  
10 right to bring this suit for past and future damages and/or injunctive relief.

11 34. The ’128 patent is valid and enforceable.

12 35. Sonos infringes one or more claims of the ’128 patent, including but not limited to  
13 claims 1-3, 5-8, 10-13, and 15 (the “Asserted ’128 Claims”), directly and/or indirectly via induced  
14 infringement and/or contributory infringement. Sonos infringes the Asserted ’128 Claims by  
15 making, using, offering to sell, importing, selling for importation, and/or selling after importation  
16 into the United States at least Sonos audio player products that include one or more microphones  
17 and support Sonos Voice Control, including the Accused Voice Products in violation of 35 U.S.C.  
18 §§ 271(a)-(c). On information and belief, the Accused Voice Products satisfy all claim limitations  
19 of the asserted claims at the time of importation into and/or sale in the United States.

20 36. Sonos had knowledge of the ’128 patent by no later than the filing of this action.

21 37. Sonos directly infringes the Asserted ’128 Claims by making, using, offering to  
22 sell, or selling the Accused Voice Products in the United States and by importing the Accused  
23 Voice Products into the United States in violation of 35 U.S.C. § 271(a). A claim chart illustrating  
24 Sonos’s infringement of independent claims 1, 6, and 11 of the ’128 patent for a representative  
25 Accused Voice Product is attached as Exhibit 18.

26 38. Sonos actively, knowingly, and intentionally induces the infringement of the  
27 Asserted ’128 Claims by actively encouraging others to make, use, offer to sell, or sell the  
28 Accused Voice Products in the United States and/or import the Accused Voice Products into the



1 United States in violation of 35 U.S.C. § 271(b). By at least the filing of this Complaint, Sonos  
2 knows (or should know) that its actions will induce (and do induce) users of the Accused Voice  
3 Products to directly infringe the Asserted '128 Claims. For example, Sonos promotes Sonos  
4 Voice Control as providing “[f]ast, accurate control of your music and your Sonos System,” and as  
5 being available “on new voice capable products and as a free update for existing customers.” Ex.  
6 17 (retrieved August 3, 2022) available at [https://www.sonos.com/en-us/newsroom/introducing-](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening)  
7 [effortless-listening](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening).

8 39. Sonos contributorily infringes the Asserted '128 Claims by offering to sell or  
9 selling within the United States or importing into the United States the Accused Voice Products  
10 (where each of the Accused Voice Products is or contains a component of a patented machine,  
11 manufacture, combination or composition, or a material or apparatus for use in practicing a  
12 patented process, constituting a material part of the invention), knowing, by at least the filing of  
13 this Complaint, the same to be especially made or especially adapted for use in an infringement of  
14 such patent, and not a staple article or commodity of commerce suitable for substantial non-  
15 infringing use in violation of 35 U.S.C. § 271(c).

16 40. Sonos's continued infringement of the '128 patent is willful and deliberate because  
17 it knows of the '128 patent and the infringement of that patent no later than the filing of this  
18 action, but continues to act despite an objectively high likelihood that such acts will result in  
19 infringement of the patent.

20 41. As the direct and proximate result of Sonos's conduct, Google has suffered and, if  
21 Sonos's conduct is not stopped, will continue to suffer, competitive harm, irreparable injury, and  
22 damages in an amount to be proven at trial. Because Google's remedy at law is inadequate,  
23 Google seeks, in addition to damages, permanent injunctive relief. Google's business operates in  
24 a competitive market and will continue suffering irreparable harm absent injunctive relief.

### 25 **THIRD CAUSE OF ACTION**

#### 26 **(Infringement of U.S. Patent No. 9,632,748)**

27 42. Google incorporates and realleges all of the above paragraphs as though fully set  
28 forth herein.

1           43.     U.S. Patent No. 9,632,748, titled “Device Designation for Audio Input  
2 Monitoring,” was duly and lawfully issued by the United States Patent and Trademark Office on  
3 April 25, 2017, and is assigned to Google LLC. A true and correct copy of the ’748 patent is  
4 attached to this Complaint as Exhibit 3.

5           44.     Google is the owner of all rights, title, and interest in the ’748 patent, including the  
6 right to bring this suit for past and future damages and/or injunctive relief.

7           45.     The ’748 patent is valid and enforceable.

8           46.     Sonos infringes one or more claims of the ’748 patent, including but not limited to  
9 claims 1-4, 7, 9-12, 14, and 15 (the “Asserted ’748 Claims”), directly and/or indirectly via induced  
10 infringement and/or by contributory infringement. Sonos infringes the Asserted ’748 Claims by  
11 making, using, offering to sell, importing, selling for importation, and/or selling after importation  
12 into the United States at least Sonos audio player products that include one or more microphones  
13 and support Sonos Voice Control, including the Accused Voice Products in violation of 35 U.S.C.  
14 §§ 271(a)-(c). On information and belief, the Accused Voice Products satisfy all claim limitations  
15 of the asserted claims at the time of importation into and/or sale in the United States.

16           47.     Sonos had knowledge of the ’748 patent by no later than the filing of this action.

17           48.     Sonos directly infringes the Asserted ’748 Claims by making, using, offering to  
18 sell, or selling the Accused Voice Products in the United States and by importing the Accused  
19 Voice Products into the United States in violation of 35 U.S.C. § 271(a). A claim chart illustrating  
20 Sonos’s infringement of independent claims 1, 7, and 11 of the ’748 patent for a representative  
21 Accused Voice Product is attached as Exhibit 19.

22           49.     Sonos actively, knowingly, and intentionally induces the infringement of the  
23 asserted claims by actively encouraging others to make, use, offer to sell, or sell the Accused  
24 Voice Products in the United States and/or import the Accused Voice Products into the United  
25 States in violation of 35 U.S.C. § 271(b). By at least the filing of this Complaint, Sonos knows (or  
26 should know) that its actions will induce (and do induce) users of the Accused Voice Products to  
27 directly infringe the Asserted ’748 Claims. For example, Sonos promotes Sonos Voice Control as  
28 providing “[f]ast, accurate control of your music and your Sonos System,” and as being available

1 “on new voice capable products and as a free update for existing customers.” Ex. 17 (retrieved  
2 August 3, 2022), available at [https://www.sonos.com/en-us/newsroom/introducing-effortless-](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening)  
3 [listening](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening).

4 50. Sonos contributorily infringes the Asserted ’748 Claims by offering to sell or  
5 selling within the United States or importing into the United States the Accused Voice Products  
6 (where each of the Accused Voice Products is or contains a component of a patented machine,  
7 manufacture, combination or composition, or a material or apparatus for use in practicing a  
8 patented process, constituting a material part of the invention), knowing, by at least the filing of  
9 this Complaint, the same to be especially made or especially adapted for use in an infringement of  
10 such patent, and not a staple article or commodity of commerce suitable for substantial non-  
11 infringing use in violation of 35 U.S.C. § 271(c).

12 51. Sonos’s continued infringement of the ’748 patent is willful and deliberate because  
13 it knows of the ’748 patent and the infringement of that patent no later than the filing of this  
14 action, but continues to act despite an objectively high likelihood that such acts will result in  
15 infringement of the patent.

16 52. As the direct and proximate result of Sonos’s conduct, Google has suffered and, if  
17 Sonos’s conduct is not stopped, will continue to suffer, competitive harm, irreparable injury, and  
18 damages in an amount to be proven at trial. Because Google’s remedy at law is inadequate,  
19 Google seeks, in addition to damages, permanent injunctive relief. Google’s business operates in  
20 a competitive market and will continue suffering irreparable harm absent injunctive relief.

21 **FOURTH CAUSE OF ACTION**

22 **(Infringement of U.S. Patent No. 11,050,615)**

23 53. Google incorporates and realleges all of the above paragraphs as though fully set  
24 forth herein.

25 54. U.S. Patent No. 11,050,615, titled “Apparatus and Method for Seamless  
26 Commissioning of Wireless Devices,” was duly and lawfully issued by the United States Patent  
27 and Trademark Office on June 29, 2021, and is assigned to Google LLC. A true and correct copy  
28 of the ’615 patent is attached to this Complaint as Exhibit 4.

1           55.     Google is the owner of all rights, title, and interest in the '615 patent, including the  
2 right to bring this suit for past and future damages and/or injunctive relief.

3           56.     The '615 patent is valid and enforceable.

4           57.     Sonos infringes one or more claims of the '615 patent, including but not limited to  
5 claims 1-3, 5-9, 11, 15-17, and 19 (the "Asserted '615 Claims") directly and/or indirectly via  
6 induced infringement and/or by contributory infringement. Sonos infringes the Asserted '615  
7 Claims by making, using, offering to sell, importing, selling for importation, and/or selling after  
8 importation into the United States at least Sonos audio player products that support commissioning  
9 of the device into a system via short-range transmissions, including the Sonos One, Sonos One SL,  
10 Sonos Move, Sonos Roam, Sonos Roam SL, Sonos Five, Sonos Arc, Sonos Beam, and Sonos Ray  
11 (collectively, the "Accused Player Products") in violation of 35 U.S.C. §§ 271(a)-(c). On  
12 information and belief, the Accused Player Products satisfy all claim limitations of the asserted  
13 claims at the time of importation into and/or sale in the United States.

14           58.     Sonos had knowledge of the '615 patent by no later than the filing of this action.

15           59.     Sonos directly infringes the Asserted '615 Claims by making, using, offering to  
16 sell, or selling the Accused Player Products in the United States and by importing the Accused  
17 Player Products into the United States in violation of 35 U.S.C. § 271(a). A claim chart  
18 illustrating Sonos's infringement of independent claims 1, 11, and 16 of the '615 patent for a  
19 representative Accused Player Product is attached as Exhibit 20.

20           60.     Sonos actively, knowingly, and intentionally induces the infringement of the  
21 Asserted '615 Claims by actively encouraging others to make, use, offer to sell, or sell the  
22 Accused Player Products in the United States and/or import the Accused Player Products into the  
23 United States in violation of 35 U.S.C. § 271(b). By at least the filing of this Complaint, Sonos  
24 knows (or should know) that its actions will induce (and do induce) users of the Accused Player  
25 Products to directly infringe the Asserted '615 Claims. For example, Sonos instructs its customers  
26 to use its Sonos Roam Speaker to perform the commissioning techniques in an infringing manner.  
27 *See* Ex. 24 (retrieved August 3, 2022), available at <https://support.sonos.com/s/article/4994>.

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1 Sonos's customers and end users of Sonos's infringing products test and/or operate the products in  
2 the United States in accordance with Sonos's instructions contained in Sonos's user guides. *Id.*

3 61. Sonos contributorily infringes the Asserted '615 Claims by offering to sell or  
4 selling within the United States or importing into the United States the Accused Player Products  
5 (where each of the Accused Player Products is or contains a component of a patented machine,  
6 manufacture, combination or composition, or a material or apparatus for use in practicing a  
7 patented process, constituting a material part of the invention), knowing, by at least the filing of  
8 this Complaint, the same to be especially made or especially adapted for use in an infringement of  
9 such patent, and not a staple article or commodity of commerce suitable for substantial non-  
10 infringing use in violation of 35 U.S.C. § 271(c).

11 62. Sonos's continued infringement of the '615 patent is willful and deliberate because  
12 it knows of the '615 patent and the infringement of that patent no later than the filing of this  
13 action, but continues to act despite an objectively high likelihood that such acts will result in  
14 infringement of the patent.

15 63. As the direct and proximate result of Sonos's conduct, Google has suffered and, if  
16 Sonos's conduct is not stopped, will continue to suffer, competitive harm, irreparable injury, and  
17 damages in an amount to be proven at trial. Because Google's remedy at law is inadequate,  
18 Google seeks, in addition to damages, permanent injunctive relief. Google's business operates in  
19 a competitive market and will continue suffering irreparable harm absent injunctive relief.

20 **PRAYER FOR RELIEF**

21 WHEREFORE, Google respectfully requests the following relief:

- 22 A. Judgment in Google's favor and against Sonos on all causes of action alleged  
23 herein;
- 24 B. Damages in an amount to be further proven at trial, including trebling of all  
25 damages awarded with respect to infringement of the U.S. Patent Nos. 11,024,311,  
26 9,812,128, 9,632,748, and 11,050,615;
- 27 C. An injunction prohibiting further infringement of the Asserted Patents by Sonos;
- 28 D. Judgment that this is an exceptional case;

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- E. Costs of suit incurred herein;
- F. Prejudgment interest;
- G. Attorneys’ fees and costs; and
- H. Such other and further relief as the Court may deem to be just and proper.

DATED: August 8, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By           /s/ Patrick D. Curran            
Patrick D. Curran  
Attorneys for GOOGLE LLC

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**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Google respectfully demands a trial by jury on all issues triable by jury.

DATED: August 8, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By                   /s/ Patrick D. Curran                    
Patrick D. Curran  
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