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15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**
17 **SOUTHERN DIVISION**

18
19 SKYBELL TECHNOLOGIES, INC.,

20 Plaintiff,

21 vs.

22 RING INC.,

23 Defendant.

Case No. 8:18-cv-00014-JVS-JDE

**FIRST AMENDED COMPLAINT FOR
PATENT INFRINGEMENT**

JURY TRIAL DEMANDED

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1 Plaintiff SkyBell Technologies, Inc. (“SkyBell” or “Plaintiff”) files this First
2 Amended Complaint for patent infringement against Defendant Ring Inc.
3 (“Ring” or “Defendant”), and alleges as follows:

4 **INTRODUCTION**

5 1. This lawsuit is the tale of two companies in the emerging video
6 doorbell market. The plaintiff SkyBell is the technological and intellectual
7 market leader. As of the date of this complaint, SkyBell’s innovations have been
8 recognized in 71 issued U.S. patents (47 utility and 24 design patents), by far
9 the most of any company in the field. And that innovation pays off for
10 consumers in SkyBell’s products: SkyBell routinely beats its industry
11 competitors in head-to-head product reviews (including those conducted by
12 the New York Times, CNET, and Entrepreneur, to name just a few).

13 2. Ring, by contrast, has taken a different approach. Ring has devoted
14 its attention and resources to advertising and marketing, which no doubt has
15 contributed to its familiarity among consumers. But Ring has not had nearly
16 the same success with research and development. Ring has only five issued
17 utility patents to its name, and its consistent approach to video doorbell
18 technology is to copy from SkyBell.

19 3. Ring has every right to attempt to compete with SkyBell via hype
20 rather than innovation. What Ring may not do, however, is compete by theft.
21 Ring has knowingly and repeatedly trampled upon SkyBell’s patent rights.
22 SkyBell brings this lawsuit to redress that infringement and ensure fair
23 competition within the video doorbell market.

24 **NATURE OF THE ACTION**

25 4. This is an action under the patent laws of the United States, 35
26 U.S.C. §§ 1, et seq., for infringement by Ring of certain claims of U.S. Patent Nos.
27 9,055,202; 9,179,109; 9,179,107; 9,743,049; and 9,160,987 (collectively
28 referred to as the “Patents-in-Suit”).

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THE PARTIES

5. SkyBell is a corporation duly organized and existing under the laws of Nevada, having its principal place of business at 1 Jenner #100, Irvine, California 92618. SkyBell is the assignee and owner of the Patents-in-Suit.

6. On information and belief, Ring is a corporation duly organized and existing under the laws of Delaware, having its principal place of business at 1523 26th Street, Santa Monica, California 90404.

JURISDICTION AND VENUE

7. This Court has original subject matter jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Ring because, inter alia, upon information and belief, (i) Ring has its principal place of business in Santa Monica, California; (ii) Ring has done and continues to do business in California; and (iii) Ring has committed and continues to commit acts of patent infringement in the State of California, including by making, using, offering to sell, and/or selling accused products and services in California, and/or inducing others to commit acts of patent infringement in this District.

9. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b) because, inter alia, upon information and belief, (i) Ring has its principal place of business in Santa Monica, California; (ii) Ring has done and continues to do business in California; and (iii) Ring has committed and continues to commit acts of patent infringement in the State of California, including by making, using, offering to sell, and/or selling accused products and services in California, and/or inducing others to commit acts of patent infringement in this District.

SKYBELL'S INNOVATIONS

10. In 2013, Joseph Scalisi, Desiree Mejia and Andrew Thomas founded SkyBell, which was then called iDoorCam. At the time, Mr. Scalisi was

1 working in a business so small it lacked the means for a receptionist—whoever
2 sat closest to the door was forced to jump up to answer knocks from visitors,
3 solicitors, and others. Mr. Scalisi devised a novel solution to the problem: a
4 video doorbell that displayed every visitor on the screen of your smartphone.
5 Realizing he was onto something, Mr. Scalisi contacted friends to help design
6 and engineer his vision.

7 11. By September 2013, SkyBell successfully prototyped its video
8 doorbell. By that time, SkyBell had launched an extremely successful crowd-
9 sourcing campaign, raising approximately \$600,000 for its device on the
10 website Indiegogo (plus another \$300,000 in sales from the SkyBell website).

11 12. In January 2014, buoyed by the success of the Indiegogo campaign,
12 SkyBell introduced its first video doorbell product to the market. Since that
13 time, SkyBell has released four versions of its signature round video doorbell,
14 as well as two thinner models (the SkyBell Slim and SkyBell Trim Plus):



22 13. SkyBell markets directly to consumers, but it has thrived primarily
23 by entering into major industry partnerships. SkyBell is the video doorbell of
24 choice for large-scale service providers such as Honeywell, Comcast, and
25 Alarm.com.

26 14. SkyBell has consistently attracted praise from the industry press
27 for the quality of its products. Most recently, PC Magazine chose the SkyBell
28 HD as its “top pick for video doorbells” (in a line-up that includes three Ring

1 video doorbells) in a February 20, 2018 article.¹ Wirecutter, a New York Times
2 publication, declared SkyBell the “best doorbell camera” in an October 4, 2017,
3 article—beating Ring and every other competitor.² Similarly, in a November 5,
4 2017 article, a CNET reviewer called the SkyBell doorbell her “favorite” among
5 all the competitors in the market (including Ring).³ And on December 6, 2016,
6 Entrepreneur labeled SkyBell as the “best video doorbell available.”⁴

7 15. SkyBell has achieved this success in part through its commitment
8 to innovation, research and development. SkyBell has secured 71 U.S. patents,
9 with many more pending. It also has an extensive portfolio of foreign patents.
10 SkyBell believes it has more patents specifically relating to video doorbells
11 than any competitor in the industry. Indeed, a study recently named Mr.
12 Scalisi, one of the named inventors on the Patents-in-Suit, among the 250 most
13 prolific inventors of “Internet of Things” technologies.

14 PATENTS-IN-SUIT

15 16. On June 9, 2015, the United States Patent and Trademark Office
16 duly and lawfully issued U.S. Patent No. 9,055,202 (the “’202 Patent”), entitled
17 “Doorbell Communication Systems and Methods.” A true and correct copy of
18 the ’202 Patent is attached hereto as Exhibit A.

19 17. All rights, title, and interest in the ’202 Patent have been assigned
20 to SkyBell, the sole owner of the ’202 Patent. SkyBell has been the sole owner
21 of the ’202 Patent since its issuance.

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24 ¹ *SkyBell HD*, PC Mag, available at <https://www.pcmag.com/review/359328/skybell-hd>.
See also *The Best Video Doorbells of 2018*, PC Mag, available at <https://www.pcmag.com/roundup/358684/the-best-video-doorbells>.

25 ² *The Best Smart Doorbell Camera*, Wirecutter, available at <https://thewirecutter.com/reviews/best-smart-doorbell-camera>.

26 ³ *7 smart doorbells that make screening visitors oh-so easy*, CNET, available at
27 <https://www.cnet.com/news/you-wont-have-to-guess-whos-coming-to-dinner-with-these-smart-doorbells>.

28 ⁴ *Top 25 Tech Gadgets to Give This Holiday Season*, Entrepreneur, available at
<https://www.entrepreneur.com/article/286054>.

1 18. The '202 Patent is generally directed towards doorbells that can
2 detect visitors using a visitor detection system including a camera assembly, a
3 motion detector assembly, or an infrared detector assembly. The '202 Patent
4 describes a visitor detection system with multiple sensors to detect indications
5 suggestive of a visitor with a wall separating the sensors to divide the field of
6 view of the visitor detection system, such that different sensors are configured
7 to detect the indications suggestive of a visitor in different portions of the field
8 of view.

9 19. On November 3, 2015, the United States Patent and Trademark
10 Office duly and lawfully issued U.S. Patent No. 9,179,109 (the "'109 Patent"),
11 entitled "Doorbell Communication Systems and Methods." A true and correct
12 copy of the '109 Patent is attached hereto as Exhibit B.

13 20. All rights, title, and interest in the '109 Patent have been assigned
14 to SkyBell, the sole owner of the '109 Patent. SkyBell has been the sole owner
15 of the '109 Patent since its issuance.

16 21. The '109 Patent is generally directed towards doorbell systems
17 comprising a doorbell with a camera and a remote computing device, where
18 the two communicate with each other such that an application on a remote
19 computing device can cause the doorbell camera to exit its sleep mode and
20 record a video that is sent to the remote computing device.

21 22. On November 3, 2015, the United States Patent and Trademark
22 Office duly and lawfully issued U.S. Patent No. 9,179,107 (the "'107 Patent"),
23 entitled "Doorbell Chime Systems and Methods." A true and correct copy of the
24 '107 Patent is attached hereto as Exhibit C.

25 23. All rights, title, and interest in the '107 Patent have been assigned
26 to SkyBell, the sole owner of the '107 Patent. SkyBell has been the sole owner
27 of the '107 Patent since its issuance.

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1 unsuccessfully appeared on the television program Shark Tank, failing to
2 secure any funding. It leveraged the ensuing publicity into additional sales,
3 however, and later rebranded itself as “Ring.”

4 32. After its Shark Tank appearance, Ring has continued to pursue the
5 same strategy: attract sales by advertising and marketing, without necessarily
6 providing any technical innovation. Indeed, although Ring may claim to be a
7 leader in video doorbell technology, the numbers tell a different story. On
8 information and belief, based on SkyBell’s search of publicly available
9 information, Ring has obtained only five U.S. utility patents.

10 33. Upon information and belief, including based on Ring’s services
11 and products identified on Ring’s website and in its mobile application, Ring
12 makes, uses, offers to sell, and/or sells in the United States, and/or import into
13 the United States, products and services that practice the inventions disclosed
14 in the Patents-in-Suit, including, but not limited to, Ring’s video doorbells (the
15 “Ring Hardware”) and the mobile Ring application (the “Ring App”).

16 34. The Ring Hardware includes Ring Video Doorbell, Ring Video
17 Doorbell 2, Ring Video Doorbell Pro, and Ring Video Doorbell Elite.



22 Video Doorbell



Video Doorbell 2



Video Doorbell Pro



Video Doorbell Elite

23 35. The Ring Hardware includes an accessory doorbell chime—Ring
24 Chime and Ring Chime Pro.

25 36. In addition to directly infringing the Asserted Patents pursuant to
26 35 U.S.C. § 271(a), literally and/or under the doctrine of equivalents, upon
27 information and belief, Ring indirectly infringes the Asserted Patents because
28 it actively and knowingly directs, causes, induces, and encourages others,

1 including, but not limited to, its software developers, customers, advertisers,
2 end users, and app users to make, use, sell, and/or offer to sell in the United
3 States, and/or import into the United States, application products and services
4 that practice the inventions disclosed in the Patents-in-Suit, including, but not
5 limited to, the Ring Hardware and the Ring App, by, among other things,
6 providing instructions and technical assistance relating to the installation,
7 download, set up, use, operation, and maintenance of said Ring Hardware and
8 Ring App.

9 **NOTICE OF INFRINGEMENT**

10 37. Ring has had notice of the Patents-in-Suit. For example, on May 30,
11 2016, Mr. Scalisi, SkyBell's CEO, sent an email message to Ring's founder Jamie
12 Siminoff. Mr. Scalisi's email signature includes a link to a webpage outlining
13 SkyBell's patent portfolio. On June 1, 2016, Mr. Siminoff answered that email
14 and specifically addressed Mr. Scalisi's patent portfolio link in his response.

15 38. On information and belief, Ring is acutely aware of the important
16 intellectual property in the video doorbell industry. For example, in the
17 summer of 2016, executives at SkyBell met with Mr. Siminoff and discussed
18 who held key patent rights to video doorbells. As such, it is highly likely that
19 Ring has investigated SkyBell's patent portfolio and understands SkyBell's
20 intellectual property position.

21 39. In addition, as mentioned above, Ring has very few issued U.S.
22 patents. One patent that it does own (and which is clearly invalid), is U.S.
23 Patent No. 9,819,713 (the '713 Patent). Mr. Siminoff is a purported co-inventor
24 of the '713 Patent. The '713 Patent lists numerous SkyBell patents in its
25 recitation of the prior art, including the '202, '109,'107, and '987 patents.
26 Accordingly, Ring had further notice of SkyBell's patents as a result of Ring's
27 own patent practice.
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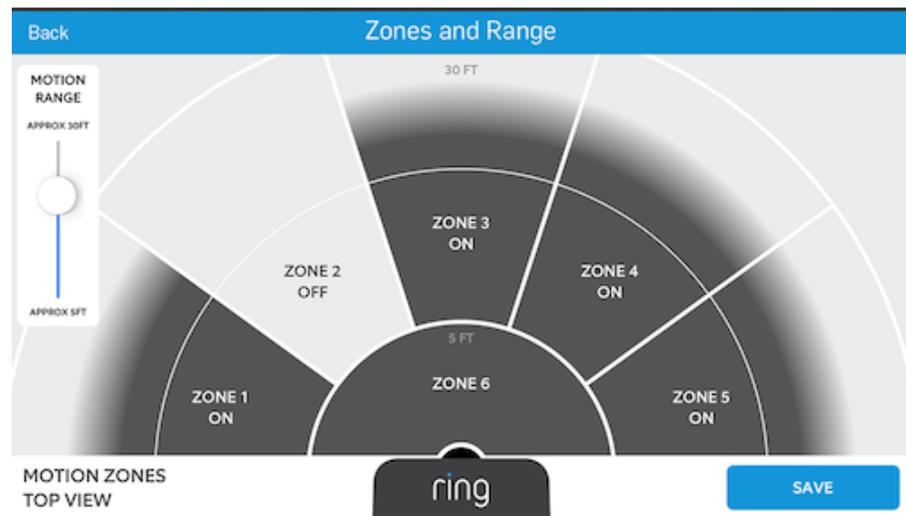
1 40. In the alternative, Ring has notice of the Patents-in-Suit at least as
2 of the date of the original complaint.

3 **COUNT I**
4 **(INFRINGEMENT OF THE '202 PATENT)**

5 41. SkyBell incorporates the preceding paragraphs as if fully set forth
6 herein.

7 42. Ring infringes the '202 Patent by making, using, selling, and/or
8 offering for sale in the United States, and/or importing into the United States,
9 Ring Hardware and Ring Apps that meet the elements of the asserted claims.

10 43. By way of a non-limiting example, the Ring Doorbell practices the
11 inventions disclosed in the '202 Patent because it has a visitor detection
12 system with three infrared motion sensors, each responsible for detecting
13 indications suggestive of a visitor in three different portions of the field of
14 view, as illustrated on Ring's website:⁵



24 The Ring Doorbell's visitor detection system has a wall that separates the three
25 sensors to divide the field of view so that each sensor detects indications
26 suggestive of a visitor in different portions of the field of view:

27 _____
28 ⁵ <https://support.ring.com/hc/en-us/articles/204366534-Utilizing-Motion-Detection-with-your-Ring-Video-Doorbell-or-Stick-Up-Cam>.

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44. Upon information and belief, Ring has infringed at least claims 1, 4, 5, 7, 8, 18, and 19 of the '202 Patent, pursuant to 35 U.S.C. § 271(a), by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States the Ring Hardware and the Ring App. Upon information and belief, Ring's infringement pursuant to 35 U.S.C. § 271(a) is ongoing.

45. Upon information and belief, since having notice of the '202 Patent, Ring has induced infringement of at least claims 1, 18, and 19 of the '202 Patent pursuant to 35 U.S.C. § 271(b) by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to, its software developers, customers, advertisers, end users, and app users to make, use, sell, and/or offer to sell in the United States, and/or import into the United States, products and services that practice the inventions disclosed in the '202 Patent, by, among other things, providing instructions and technical assistance relating to the installation, download, set up, use, operation, and maintenance of the Ring Hardware and Ring App.

46. In one example, Ring has induced infringement of the above-identified claims by providing its software developers, customers, advertisers, end users, and app users with the Ring Hardware and Ring App, knowing and/or intending that, when used as intended, the Ring Hardware and/or Ring

1 App meet the elements of the asserted claims. In another example, Ring has
2 induced infringement of the above-identified claims of the '202 Patent by
3 knowingly and/or willfully providing instructions and technical assistance that
4 explain, instruct, direct, cause, and encourage its software developers,
5 customers, advertisers, end users, and app users to download or install the
6 Ring App from a mobile application store and to run and use the Ring App,
7 thereby activating its infringing functionalities.

8 47. Ring committed the foregoing infringing activities without license
9 from SkyBell and with notice of the '202 Patent.

10 48. Ring knew the '202 Patent existed while committing the foregoing
11 infringing acts, thereby willfully, wantonly, and deliberately infringing the '202
12 Patent. Accordingly, SkyBell's damages should be trebled pursuant to 35 U.S.C.
13 § 284 because of Ring's willful infringement of the '202 Patent.

14 49. The acts of infringement by Ring have been with the knowledge of
15 the '202 Patent and are willful, wanton, and deliberate, thus rendering this
16 action "exceptional" within the meaning of 35 U.S.C. § 285 and entitling SkyBell
17 to its reasonable attorney's fees and litigation expenses.

18 50. The acts of infringement by Ring will continue unless enjoined by
19 this Court.

20 51. SkyBell has been and will continue to be irreparably harmed and
21 damaged by Ring's infringement of the '202 Patent and has no adequate
22 remedy at law.

23 **COUNT II**

24 **(INFRINGEMENT OF THE '109 PATENT)**

25 52. SkyBell incorporates the preceding paragraphs as if fully set forth
26 herein.

27 53. Ring infringes the '109 Patent by making, using, selling, and/or
28 offering for sale in the United States, and/or importing into the United States,

1 Ring Hardware and Ring Apps that meet the elements of the asserted claims.
2 By way of a non-limiting example, the Ring Doorbell with the Ring app practice
3 the inventions disclosed in the '109 Patent because the Ring app has a "Live
4 View" feature, which provides on-demand access to the doorbell camera to
5 record a live video feed. This enables a user of the device to override or exit
6 the sleep power setting of the doorbell, and to enter a recording mode, as
7 described on Ring's website:⁶

8 **Accessing Live View**

- 9
- 10 • On the "My Devices" screen under your Location, select the device from which you want to access Live View.
 - 11 • Tap the "Live View" button to watch a live video stream from your device.

12 54. Ring has infringed at least claims 1, 7, 15, and 20 of the '109
13 Patent, pursuant to 35 U.S.C. § 271(a), by making, using, offering to sell, and/or
14 selling in the United States, and/or importing into the United States the Ring
15 Hardware and the Ring App. Ring's infringement pursuant to 35 U.S.C. § 271(a)
16 is ongoing.

17 55. Upon information and belief, since having notice of the '109
18 Patent, Ring has induced infringement of at least claims 1, 7, 15, and 20 of the
19 '109 Patent pursuant to 35 U.S.C. § 271(b) by actively and knowingly inducing,
20 directing, causing, and encouraging others, including, but not limited to, its
21 software developers, customers, advertisers, end users, and app users to make,
22 use, sell, and/or offer to sell in the United States, and/or import into the United
23 States, products and services that practice the inventions disclosed in the '109
24 Patent, by, among other things, providing instructions and technical assistance
25 relating to the installation, download, set up, use, operation, and maintenance
26 of the Ring Hardware and Ring App.

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28 ⁶ <https://support.ring.com/hc/en-us/articles/208144516-Using-Live-View>.

1 56. In one example, Ring has induced infringement of the above-
2 identified claims by providing its software developers, customers, advertisers,
3 end users, and app users with the Ring Hardware and Ring App, knowing
4 and/or intending that, when used as intended, the Ring Hardware and/or Ring
5 App meet the elements of the asserted claims. In another example, Ring has
6 induced infringement of the above-identified claims of the '109 Patent by
7 knowingly and/or willfully providing instructions and technical assistance that
8 explain, instruct, direct, cause, and encourage its software developers,
9 customers, advertisers, end users, and app users to download or install the
10 Ring App from a mobile application store and to run and use the Ring App,
11 thereby activating its infringing functionalities.

12 57. Ring committed the foregoing infringing activities without license
13 from SkyBell and with notice of the '109 Patent.

14 58. Ring knew the '109 Patent existed while committing the foregoing
15 infringing acts, thereby willfully, wantonly, and deliberately infringing the '109
16 Patent. Accordingly, SkyBell's damages should be trebled pursuant to 35 U.S.C.
17 § 284 because of Ring's willful infringement of the '109 Patent.

18 59. The acts of infringement by Ring have been with the knowledge of
19 the '109 Patent and are willful, wanton, and deliberate, thus rendering this
20 action "exceptional" within the meaning of 35 U.S.C. § 285 and entitling SkyBell
21 to its reasonable attorney's fees and litigation expenses.

22 60. The acts of infringement by Ring will continue unless enjoined by
23 this Court.

24 61. SkyBell has been and will continue to be irreparably harmed and
25 damaged by Ring's infringement of the '109 Patent and has no adequate
26 remedy at law.

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COUNT III
(INFRINGEMENT OF THE '107 PATENT)

62. SkyBell incorporates the preceding paragraphs as if fully set forth herein.

63. Ring infringes the '107 Patent by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, Ring Hardware and Ring App that meet the elements of the asserted claims. By way of a non-limiting example, the Ring Doorbell with a Chime accessory practices the inventions disclosed in the '107 Patent because the Ring App allows for selection of a chime sound and then uploading a sound file to the remotely located Chime, as described on Ring's website:⁷

Downloading Your New Tones
After saving your selected ringtones, you'll see the blue light on your Chime begin to flash; this means it's downloading. Once the light turns solid blue, the download is done, and you're ready to use the new tones.
Note: It may take a few minutes for your Chime to download the new tones.

64. Ring has infringed at least claims 12 and 18 of the '107 Patent, pursuant to 35 U.S.C. § 271(a), by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States the Ring Hardware and the Ring App. Ring's infringement pursuant to 35 U.S.C. § 271(a) is ongoing.

65. Upon information and belief, since having notice of the '107 Patent, Ring has induced infringement of at least claims 12 and 18 of the '107 Patent pursuant to 35 U.S.C. § 271(b) by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to, its software developers, customers, advertisers, end users, and app users to make, use, sell, and/or offer to sell in the United States, and/or import into the United States, products and services that practice the inventions disclosed in the '107 Patent, by, among other things, providing instructions and technical assistance

⁷ <https://support.ring.com/hc/en-us/articles/214363386-Multiple-Ringtones>.

1 relating to the installation, download, set up, use, operation, and maintenance
2 of the Ring Hardware and Ring App.

3 66. In one example, Ring has induced infringement of the above-
4 identified claims by providing its software developers, customers, advertisers,
5 end users, and app users with the Ring Hardware and Ring App, knowing
6 and/or intending that, when used as intended, the Ring Hardware and/or Ring
7 App meet the elements of the asserted claims. In another example, Ring has
8 induced infringement of the above-identified claims of the '107 Patent by
9 knowingly and/or willfully providing instructions and technical assistance that
10 explain, instruct, direct, cause, and encourage its software developers,
11 customers, advertisers, end users, and app users to download or install the
12 Ring App from a mobile application store and to run and use the Ring App,
13 thereby activating its infringing functionalities.

14 67. Ring committed the foregoing infringing activities without license
15 from SkyBell and with notice of the '107 Patent.

16 68. Ring knew the '107 Patent existed while committing the foregoing
17 infringing acts, thereby willfully, wantonly, and deliberately infringing the '107
18 Patent. Accordingly, SkyBell's damages should be trebled pursuant to 35 U.S.C.
19 § 284 because of Ring's willful infringement of the '107 Patent.

20 69. The acts of infringement by Ring have been with the knowledge of
21 the '107 Patent and are willful, wanton, and deliberate, thus rendering this
22 action "exceptional" within the meaning of 35 U.S.C. § 285 and entitling SkyBell
23 to its reasonable attorney's fees and litigation expenses.

24 70. The acts of infringement by Ring will continue unless enjoined by
25 this Court.

26 71. SkyBell has been and will continue to be irreparably harmed and
27 damaged by Ring's infringement of the '107 Patent and has no adequate
28 remedy at law.

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COUNT IV
(INFRINGEMENT OF THE '049 PATENT)

72. SkyBell incorporates the preceding paragraphs as if fully set forth herein.

73. Ring infringes the '049 Patent by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, Ring Hardware and Ring App that meet the elements of the asserted claims. By way of a non-limiting example, the Ring Video Doorbell with the Ring App practice the inventions disclosed in the '049 Patent because the Ring app has a "Live View" feature which provides on-demand access to the Ring Doorbell camera. This enables a user of the device to override or exit the sleep mode setting of the doorbell, and to enter a live view mode, as described on the Ring website:⁸

[Ring Help](#) > [Ring App](#) > [Ring App](#)

Using Live View

Live View for any Ring device lets you access a live video feed from your camera at any time.

Accessing Live View

- On the "My Devices" screen under your Location, select the device from which you want to access Live View.
- Tap the "Live View" button to watch a live video stream from your device.
- To enable two-way audio between your phone and the device, press "Talk."



⁸ <https://support.ring.com/hc/en-us/articles/208144516-Using-Live-View>.

1 74. Ring has infringed at least claims 1-4, 7-9, 11-15, 18, and 19 of the
2 '049 Patent, pursuant to 35 U.S.C. § 271(a), by making, using, offering to sell,
3 and/or selling in the United States, and/or importing into the United States the
4 Ring Hardware and Ring App. Ring's infringement pursuant to 35 U.S.C.
5 § 271(a) is ongoing.

6 75. Upon information and belief, since having notice of the '049
7 Patent, Ring has induced infringement of at least claims 1-4, 7-9, 11-15, 18, and
8 19 of the '049 Patent pursuant to 35 U.S.C. § 271(b) by actively and knowingly
9 inducing, directing, causing, and encouraging others, including, but not limited
10 to its customers and end users to use products and services that practice the
11 inventions disclosed in the '049 Patent, by, among other things, providing
12 instructions and technical assistance relating to the installation, set up, use,
13 operation, and maintenance of the Ring Hardware and the Ring App.

14 76. In one example, Ring has induced infringement of the above-
15 identified claims by providing its customers and end users with the Ring
16 Hardware and the Ring App, knowing and/or intending that, when used as
17 intended, the Ring Hardware and the Ring App meet the elements of the
18 asserted claims. In another example, Ring has induced infringement of the
19 above-identified claims of the '049 Patent by knowingly and/or willfully
20 providing instructions and technical assistance that explain, instruct, direct,
21 cause, and encourage its customers and end users to install and set up the Ring
22 Hardware and the Ring App to operate to infringe the '049 Patent.

23 77. Ring committed the foregoing infringing activities without license
24 from SkyBell and with notice of the '049 Patent.

25 78. Ring knew the '049 Patent existed while committing the foregoing
26 infringing acts, thereby willfully, wantonly, and deliberately infringing the '049
27 Patent. Accordingly, SkyBell's damages should be trebled pursuant to 35 U.S.C.
28 § 284 because of Ring's willful infringement of the '049 Patent.

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Answer the Door From Anywhere

Get instant alerts when visitors press your doorbell or trigger the built-in motion sensors, and see, hear and speak to anyone at your door from your smartphone, tablet or PC.

- Motion-Activated Alerts
- Video on Demand With Live View
- Compatible With iOS, Android, Mac and Windows 10 Devices

85. Ring has infringed at least claim 1 of the '987 Patent, pursuant to 35 U.S.C. § 271(a), by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States the Ring Hardware and the Ring App. Ring's infringement pursuant to 35 U.S.C. § 271(a) is ongoing.

86. Upon information and belief, since having notice of the '987 Patent, Ring has induced infringement of at least claim 1 of the '987 Patent pursuant to 35 U.S.C. § 271(b) by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to its customers and end users to use products and services that practice the inventions disclosed in the '987 Patent, by, among other things, providing instructions and technical assistance relating to the installation, set up, use, operation, and maintenance of the Ring Hardware and the Ring App.

87. In one example, Ring has induced infringement of the above-identified claims by providing its customers and end users with the Ring Hardware, knowing and/or intending that, when used as intended, the Ring Hardware meet the elements of the asserted claims. In another example, Ring has induced infringement of the above-identified claims of the '987 Patent by knowingly and/or willfully providing instructions and technical assistance that

1 explain, instruct, direct, cause, and encourage its customers and end users to
2 install and set up the Ring Hardware and Ring App to operate to infringe the
3 '987 Patent.

4 88. Ring committed the foregoing infringing activities without license
5 from SkyBell and with notice of the '987 Patent.

6 89. Ring knew the '987 Patent existed while committing the foregoing
7 infringing acts, thereby willfully, wantonly, and deliberately infringing the '987
8 Patent. Accordingly, SkyBell's damages should be trebled pursuant to 35 U.S.C.
9 § 284 because of Ring's willful infringement of the '987 Patent.

10 90. The acts of infringement by Ring have been with the knowledge of
11 the '987 Patent and are willful, wanton, and deliberate, thus rendering this
12 action "exceptional" within the meaning of 35 U.S.C. § 285 and entitling SkyBell
13 to its reasonable attorney's fees and litigation expenses.

14 91. The acts of infringement by Ring will continue unless enjoined by
15 this Court.

16 92. SkyBell has been and will continue to be irreparably harmed and
17 damaged by Ring's infringement of the '987 Patent and has no adequate
18 remedy at law.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff SkyBell prays for judgment in its favor and
21 against Defendant Ring and specifically for the following relief:

22 (a) Entry of judgment in favor of SkyBell and against Ring on all
23 counts;

24 (b) Entry of judgment that Ring has infringed the Patents-in-Suit;

25 (c) Entry of judgment that Ring's infringement of the Patents-in-Suit
26 has been willful;

27 (d) An order permanently enjoining Ring, together with its officers,
28 directors, agents, servants, employees, those acting in privity with them, and

1 upon those persons in active concert or participation with them, from
2 infringing the Patents-in-Suit;

3 (e) An award of compensatory damages adequate to compensate
4 SkyBell for Ring's infringement of the Patents-in-Suit, in no event less than a
5 reasonable royalty, in an amount according to proof and trebled as a result of
6 willful infringement as provided by 35 U.S.C. § 284;

7 (f) An award of reasonable fees for expert witnesses and attorneys
8 pursuant to 35 U.S.C. § 285 or as otherwise permitted by law;

9 (g) Pre-judgment and post-judgment interest on SkyBell's award, in
10 an amount according to proof;

11 (h) SkyBell's costs; and

12 (i) All such other and further costs and relief as the Court deems just
13 and proper.

14 Dated: March 6, 2018

OLEG ELKHUNOVICH
MENG XI
JOSEPH S. GRINSTEIN (*pro hac vice*)
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18 By: /s/ Oleg Elkhunovich
Oleg Elkhunovich

19 Attorneys for Plaintiff SkyBell
20 Technologies, Inc.
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DEMAND FOR JURY TRIAL

SkyBell demands a trial by jury on all issues triable in this action pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated: March 6, 2018

OLEG ELKHUNOVICH
MENG XI
JOSEPH S. GRINSTEIN (*pro hac vice*)
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