

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ADIONA IP, LLC,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. _____
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
LG ELECTRONICS U.S.A., INC.,	)	
	)	
Defendant.	)	
_____	)	

**COMPLAINT**

For its Complaint, Adiona IP, LLC ("Adiona"), by and through the undersigned counsel, alleges as follows:

**THE PARTIES**

1. Adiona is a Texas limited liability company with a place of business located at 5068 West Plano Parkway, Suite 300, Plano, Texas 75093.
2. Defendant LG Electronics U.S.A., Inc. is a Delaware company with, upon information and belief, a place of business located at 1000 Sylvan Ave, Englewood Cliffs, New Jersey 07632.

**JURISDICTION AND VENUE**

3. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
5. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements 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

this district.

6. Venue is proper in this district pursuant to § 1400(b).

**THE PATENT-IN-SUIT**

7. On March 20, 2007, U.S. Patent No. 7,194,520 (the "'520 patent"), entitled "Content Player for Broadcasting to Information Appliances," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '520 patent is attached hereto as Exhibit A.

8. Adiona is the assignee and owner of the right, title and interest in and to the '520 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

**COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,194,520**

9. Adiona repeats and realleges the allegations of paragraphs 1 through 8 as if fully set forth herein.

10. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe at least claim 8 of the '520 patent by making, using, importing, offering for sale, and/or selling, methods of broadcasting media content to an information appliance from a personal computer that is linked to a network, including, but not limited to, LG FH6 in combination in combination with a LG smartphone with Bluetooth connectivity, such as, but notwithstanding, LG G6 (the combination collectively referred to herein as the "Accused Instrumentality").

11. Upon information and belief, Defendant used the Accused Instrumentality via its internal use and testing in the United States, directly infringing one or more claims of the '520 patent.

12. More specifically, the LG FH6 is a speaker system (i.e., an information appliance) with Bluetooth connectivity which allows a user to connect with the speaker wirelessly using the Bluetooth-connectivity of the LG G6. The LG G6 can access the Internet using Wi-Fi, and once connected, it can stream music to the LG FH6 speaker. *See* <http://www.lg.com/us/mobile-phones/g6#specs/design-display> ("G6 Web") (last accessed Apr. 27, 2018); User Guide LG G6 ("G6 User Guide") at pp. 114-16 (available at <http://gscs-b2c.lge.com/downloadFile?fileId=IUPuLJifFrW5brT68zK9A> (last accessed Apr. 27, 2018)). To stream/play music on the LG FH6 speaker, LG G6 is connected to the speaker over Bluetooth (i.e., a bi-directional communication link).

## Using BLUETOOTH® wireless technology

### About Bluetooth

**Bluetooth** is wireless communication technology for short range connection.

The sound may be interrupted when the connection interfered by the other electronic wave or you connect the **Bluetooth** in the other rooms.

Connecting individual devices under **Bluetooth** wireless technology does not incur any charges. A mobile phone with **Bluetooth** wireless technology can be operated via the Cascade if the connection was made via **Bluetooth** wireless technology. Available Devices : Mobile phone, MP3, Laptop, PDA.

### Bluetooth Profiles

In order to use **Bluetooth** wireless technology, devices must be able to interpret certain profiles. This unit is compatible with following profile.

A2DP (Advanced Audio Distribution Profile)

Codec : SBC

### Listening to music stored on the Bluetooth devices

#### Pairing your unit and Bluetooth device

Before you start the pairing procedure, make sure the **Bluetooth** feature is activated on your **Bluetooth** device. Refer to your **Bluetooth** device's user guide. Once a pairing operation is performed, it does not need to be performed again.

1. Turn on the unit.
2. Operate the **Bluetooth** device and perform the pairing operation. When searching for this unit with the **Bluetooth** device, a list of the devices found may appear in the **Bluetooth** device display depending on the type of **Bluetooth** device. Your unit appears as "LG FH6 (XX)".

#### ! Note

- XX means the last two digits of **Bluetooth** address. For example, if your unit has a **Bluetooth** address such as 9C:02:98:4A:F7:08, you will see "LG FH6 (08)" on your **Bluetooth** device.
- Depending on the **Bluetooth** device type, some devices may have a different pairing process. Enter the PIN code (0000) as needed.
- You can connect this unit with up to 3 **Bluetooth** devices simultaneously using the same method as described above, only in the **Bluetooth** function.
- The multi pairing connection is only supported on Android or iOS devices. (Multi pairing connection may not be supported depending on the connected device specifications.)
- Removable/detachable **Bluetooth** devices (Ex: Dongle etc.) will not support multi pairing.

3. When this unit is successfully connected with your **Bluetooth** device, "PAIRED" appears on the display window and change to **Bluetooth** device name soon. Then "BT" will be appeared on the display window.

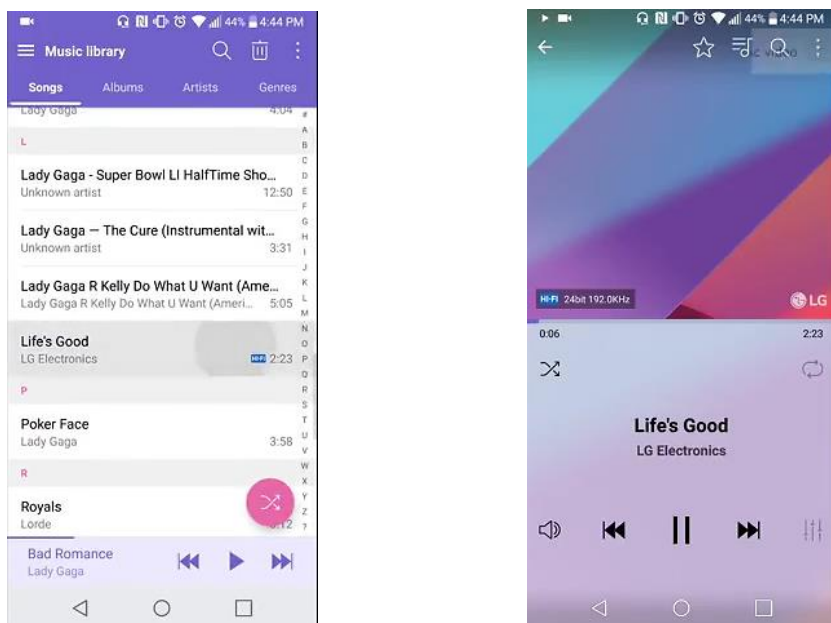
#### ! Note

- "PAIRED" will momentarily appear on the display when you connect other devices for multi pairing.
- If the device name is unavailable, "\_" will be displayed.

4. Listen to music.  
To play a music stored on your **Bluetooth** device, refer to your **Bluetooth** device's user guide.

Owner's Manual High Power Speaker System ("FH6 Owner's Manual") at p. 22 (available at <http://gscs-b2c.lge.com/downloadFile?fileId=aDAY1Lgw18Ygfb2cr7xNw> (last accessed Apr. 27, 2018)); see also <http://www.lg.com/us/home-audio/lg-FH6-shelf-stereo-systems> ("FH6 Web") (last accessed Apr. 27, 2018); G6 Web; G6 User Guide at p. 104. LG G6 allows the user create

playlists and playback a song selected from the playlist ("the media content"). As seen below, LG G6 Music Player is currently playing "Life's Good" track.



<https://www.youtube.com/watch?v=CyQ2YuxlIYI> (last accessed Apr. 27, 2018). LG G6 can be in one room while wirelessly connected through Bluetooth to the LG FH6 located in another room. See FH6 Owner's Guide at pp. 23-23. LG G6 can download music files using the Internet and store them either in the internal storage or MicroSD card storage included in the LG G6.

## Downloads

You can view, delete or share files downloaded via the Internet or apps.

Tap  > **Management** > **Downloads**.

G6 User Guide at p. 108.

- Music files may be protected by international copyright owners or copyright laws. You may have to obtain legal permission before copying a music file. To download or copy a music file, first check the copyright law for the relevant country.

*Id.* at p. 104.

## Play Music

Purchase music files from the Play Store. Play music files saved on your device.

*Id.* at p. 112.

## Specifications

- Display: 5.7" QHD Plus FullVision (2880 x 1440) with 564 ppi and 18:9 Aspect Ratio
- Battery Capacity: 3,300 mAh Non-Removable
- Platform: Android 7.0 (Nougat)
- Processor: Qualcomm Snapdragon™ 821 2.35 GHz + 1.6 GHz Quad-Core Custom 64-bit Qualcomm Kryo™
- Technology: LTE, CDMA, GSM, UMTS
- Network: CDMA, GSM, LTE, LTE CA
- Size & Weight: 5.86" (H) x 2.83" (W) x 0.31" (D); Weight: 5.74 oz.
- Internal Memory: 32 GB
- Supports microSD card up to 2 TB<sup>1</sup>
- RAM: 4 GB
- Available Colors: Platinum, Black

<sup>1</sup> microSD cards sold separately.

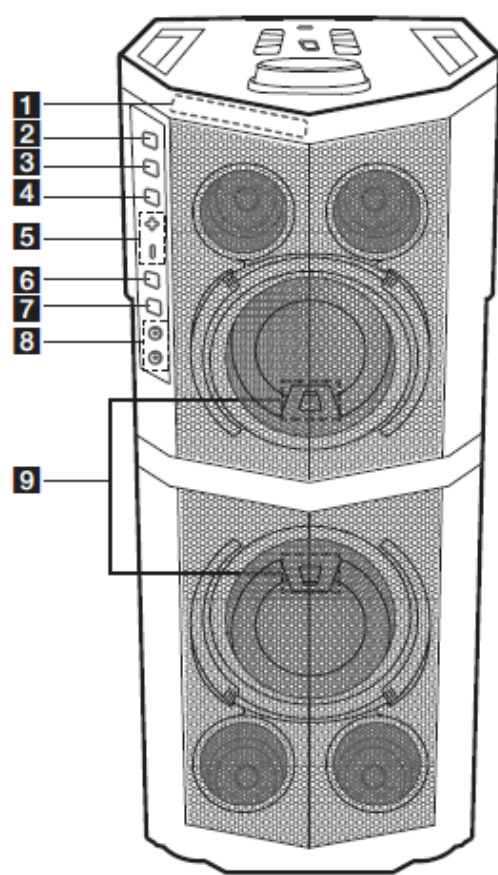
G6 Web. The LG FH6 speaker can control playback from the LG G6, which means the LG FH6 speaker transmits control signals to the LG G6.

## Controls connected Bluetooth device

You can control connected **Bluetooth** device by the unit; play, pause, skip.

FH6 Owner's Manual at p. 23.

## Front panel / Rear panel



- 1** Display window
- 2** >>I (Skip/Search)
  - Skips forward.
  - Searches for a section within a file.
  - Selects the radio stations.
- 3** >II (Play/Pause)
  - Starts or pauses playback.
  - Selects Stereo/Mono (Horizon mode Only)
- 4** I<<< (Skip/Search)
  - Skips backward.
  - Searches for a section within a file.
  - Selects the radio stations.
- 5** +/- (Volume)
  - Adjusts speaker volume.
- 6** F (Function)
  - Selects the function and input source.
- 7** ⏻/I (Standby/On)
- 8** MIC (Microphone) 1 / 2 jack
- 9** Remote control receiver

*Id.* at p. 14. For example, if the Skip/Search button (2 in the above image) is pressed, a control signal will be generated and transmitted to the LG G6 via Bluetooth and the LG G6 will broadcast the next song to the LG FH6 speaker, which will receive and playback the song. LG FH6 is Bluetooth speaker that includes a radio which transmits data using frequency hopping spread spectrum signal (FHSS) carrier.



FH6 Web.



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FH6 Owner's Manual at p. 22.

## 1.1 OVERVIEW OF BR/EDR OPERATION

The Basic Rate / Enhanced Data Rate (BR/EDR) radio (physical layer or PHY) operates in the unlicensed ISM band at 2.4 GHz. The system employs a frequency hopping transceiver to combat interference and fading and provides many FHSS carriers. Basic Rate radio operation uses a shaped, binary frequency modulation to minimize transceiver complexity. The symbol rate is 1 megasymbol per second (Msym/s) supporting the bit rate of 1 megabit per second (Mb/s) or, with Enhanced Data Rate, a gross air bit rate of 2 or 3Mb/s. These modes are known as Basic Rate and Enhanced Data Rate respectively.

Bluetooth Core Specification v 5.0 at p. 167 (available at [https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc\\_id=42104](https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc_id=42104) (last accessed Apr. 27, 2018)).

13. The LG G6 includes a controller, a memory, a network connection device, a display system, and an input/output system, the controller configured to communicate with the memory, the network connection device, the display system, and the input/output system with a system bus. *See* G6 Web.

14. Adiona is entitled to recover from Defendant the damages sustained by Adiona as a result of Defendant's infringement of the '520 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

### **JURY DEMAND**

Adiona hereby demands a trial by jury on all issues so triable.

### **PRAYER FOR RELIEF**

WHEREFORE, Adiona requests that this Court enter judgment against Defendant as follows:

A. An adjudication that Defendant has infringed the '520 patent;

B. An award of damages to be paid by Defendant adequate to compensate Adiona for Defendant's past infringement of the '520 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Adiona's reasonable attorneys' fees; and

D. An award to Adiona of such further relief at law or in equity as the Court deems just and proper.

Dated: May 11, 2018

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

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