IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BECK BRANCH LLC, Plaintiff, **v.** **SONY MOBILE COMMUICATIONS (USA) INC.,** Defendant.	**CIVIL ACTION NO** **JURY TRIAL DEMANDED**

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

1. This is an action for patent infringement in which Beck Branch LLC makes the following allegations against Sony Mobile Communications (USA) Inc.

PARTIES

2. Plaintiff Beck Branch LLC ("Plaintiff") is a Texas limited liability company with its principal place of business at 101 E. Park Blvd, Suite 600, Plano, TX 75074.

3. On information and belief, Sony Mobile Communications (USA) Inc. ("Defendant" or "Sony Mobile Communications") is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in San Mateo, California.

JURISDICTION AND VENUE

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

5. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). Sony is a Delaware corporation, and, thus, resides in Delaware for purposes of venue.

6. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long Arm Statute, due at least to its substantial business in this forum, 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 Delaware and in this Judicial District.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 6,873,620

7. Plaintiff is the owner of United States Patent No. 6,873,620 ("the '620 patent") entitled "Communication Server Including Virtual Gateway to Perform Protocol Conversion and Communication System Incorporating the Same." The '620 Patent issued on March 29, 2005. A true and correct copy of the '620 Patent is attached as Exhibit A.

8. Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides products and/or services that infringe the '620 patent. The '620 patent provides, among other things, " A communication server acting as a gateway for the transmission of messages between two virtual devices communicating with networks implementing different protocols, said communication server comprising: a knowledge base comprising a registry identifying each physical device registered to deliver messages for transmission between said virtual devices and through said gateway, a logical table identifying each registered connection available between physical devices and protocol conversion information required for each registered connection to convert messages of one protocol to a different protocol and a dynamic database identifying the current status of each actual connection between physical devices; and a virtual gateway accessing said knowledge base for protocol conversion information upon receipt of a message to be transmitted between said virtual devices and converting the protocol of said message to a protocol compatible with the network to which said message is being sent wherein said virtual gateway updates the protocol conversion information and the current status information in said knowledge base based on message traffic therethrough."

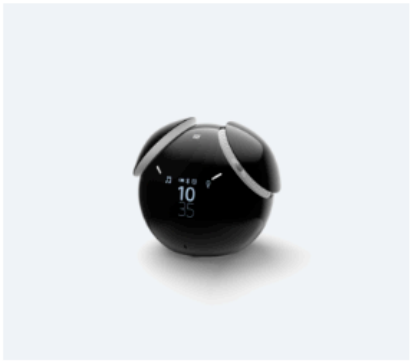
9. Defendant directly and/or through intermediaries, made, has made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or services that infringed one or more claims of the '620 patent, including at least Claim 23, in this district and elsewhere in the United States. By making, using, importing, offering for sale, and/or selling such products and services, and all like products and services, Defendant has injured Plaintiff and is thus liable for infringement of the '620 patent pursuant to 35 U.S.C. § 271.

10. Based on present information and belief, Sony Mobile Communications makes, uses, sells and/or offers for sale a communication server acting as a gateway for the transmission of messages between two virtual devices communicating with networks implementing different protocols. For example, Sony Mobile Communications provides wearables such as Sony Mobile Communications Smartwatches and Smart Bands which use Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application as a gateway for transmission of messages between the Samsung Smartwatches and Smart Fitness Bands and other devices (such as servers, computers, smartphones and/or other devices). When data is sent from Sony Mobile Communications Wearable devices such as smartwatches and/or fitness bands using Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application smartphone application (which when installed on a smartphone comprise one or more "virtual devices"), the wearable sends the data via the Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application ("communication server"). The smartphone application converts the protocol used for communicating between the Bluetooth connected wearables via the smartphone and a server (including but not limited to a Sony Mobile Communications server) connected via the internet. Further, when a message and/or call is placed using Sony's smartwatch to another smartphone and/or smart watches, the Samsung's smartwatch send the message and/or call via the Wear OS by Google (formerly known as Android Wear) smartphone application working on different protocols.

SmartBand 2
Find your balance in life

★★★½☆ (11)

- Heart rate monitor
- Activity tracker
- Pulse and stress monitor



Smart Bluetooth® Speaker BSP60
Conference calls, voice commands, and a smart alarm clock

- Voice control and handsfree calls
- Alarm and information
- Wireless music playback

SmartBand Talk SWR30
Talk to it. Log your life with it

★★★☆☆ (13)

- Voice calls and notifications
- Accelerometer and altimeter
- E Ink display – low energy, high performance

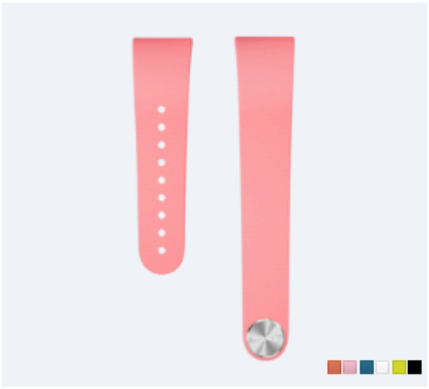
Source: https://www.sonymobile.com/us/products/smart-products/

SmartWatch 3 SWR50
Life at a glance

- Notifications on your wrist
- Full color touchscreen display
- Fill it with music and listen on the go

SmartWatch 3 Wrist Strap SWR510
Choose your style

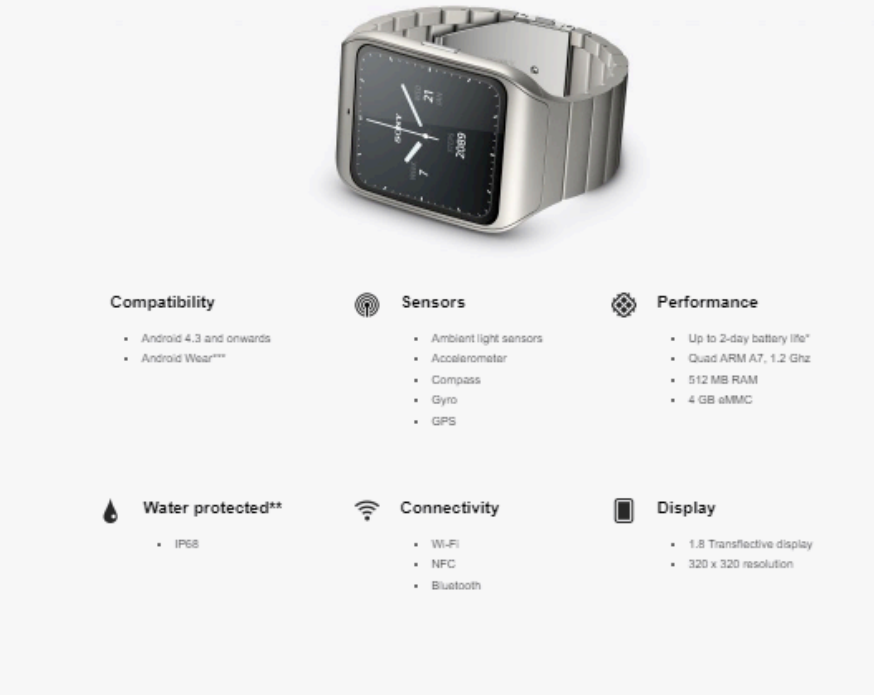
- 24/7 wearable
- Silicon – comfortable and durable
- Easy to change color



SmartBand Talk Wrist Strap SWR310
Express yourself

- Designed for SmartBand Talk
- Choose from many attractive colors
- Comfortable silicone straps

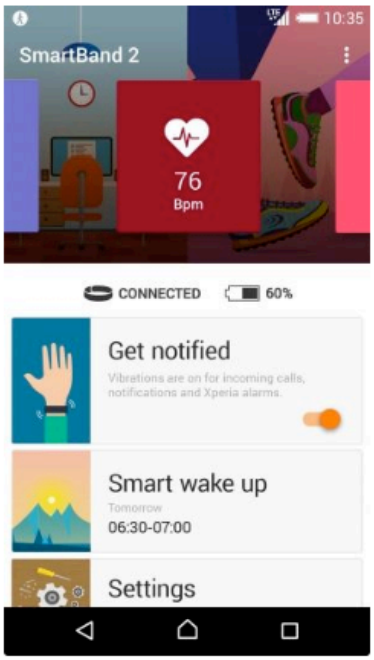
Source: https://www.Sony Mobile Communications.com/us/mobile/wearables/all-wearables/s/_/n-10+11+hv1rr/



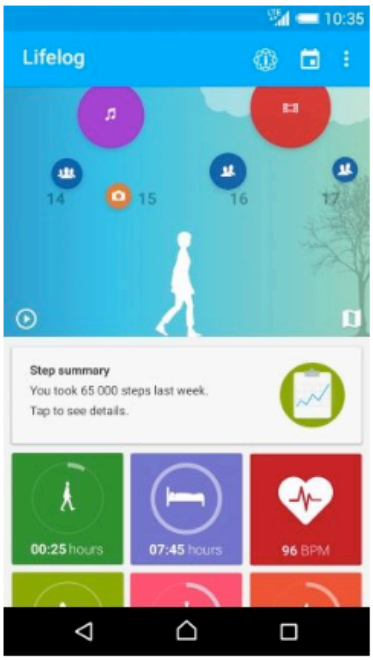
Source: https://www.sonymobile.com/us/products/smart-products/smartwatch-3-swr50/

Choose how you log

There are many ways to keep track of your SmartBand 2 activity data. For Android*** users, there's a dedicated host app to view recent data, or the Sony Lifelog app for a full timeline of heart rate data and statistics straight from your activity tracker. iOS users can download a host app that logs, analyzes, and stores all activity and heart data.



Android host app



Sony Lifelog app

iOS host app

Source: https://www.sonymobile.com/us/products/smart-products/smartband-2/features/#tabs

To set up your SmartBand using Bluetooth®

1. Make sure that your SmartBand has been charged for at least 30 minutes.
2. **Android™ device:** Make sure you have installed or updated the Smart Connect application to the latest version from Google Play™.
3. Start the Smart Connect application.
4. Turn on your SmartBand.
5. **Android™ device:** Turn on the Bluetooth® function, then scan for Bluetooth® devices and select **SWR10** in the list of available devices.
6. Follow the instructions to install the SmartBand application and the Lifelog application. appears briefly in the status bar and permanently in the Notification panel when a connection with the SmartBand is active.

! All applications required for the SmartBand to work are available on Google Play™.

You can drag down the status bar to open the Notification panel and get quick access to the SmartBand application and the Lifelog application.

Reconnecting your SmartBand

In cases where a connection gets lost, for example, when the connected Android™ device goes out of range, your SmartBand automatically performs a series of reconnection attempts. If no connection is found after a certain period, your SmartBand stops trying to reconnect. When this happens, you can use the power key to restart the reconnection attempts, or you can use NFC to reconnect the two devices.

To force restart reconnection attempts

- Briefly press the power key.

Source: https://www-support-downloads.sonymobile.com/swr10/userguide_EN_SWR10_8.pdf, page 7

To set up your SmartWatch 3 manually

1. Make sure that your Android™ phone or tablet is connected to a Wi-Fi® network and that it maintains a Wi-Fi® connection throughout the setup procedure.
2. Turn on your SmartWatch 3.
3. **Phone or tablet:** Search for the Android Wear application on Google Play™, then download and install the application.
4. **Phone or tablet:** Once Android Wear is installed, open the Android Wear application, then follow the on-screen instructions.
5. **Phone or tablet:** If Bluetooth® is not turned on, tap **Turn on Bluetooth** when prompted.
6. **Phone or tablet:** From the list of available devices, select the SmartWatch 3. A pairing code now appears on both the SmartWatch 3 and your phone or tablet.
7. Confirm on your phone or tablet that the same code is displayed on both devices. The SmartWatch 3 now checks for updates, installs any required software and restarts automatically, if necessary.
8. **Phone or tablet:** Follow the on-screen instructions to complete the setup.
9. After setup, the SmartWatch 3 prompts you to turn on some features, such as Google Now and Location services, to add more functionality and improve the user experience. If desired, follow the relevant instructions.

! The first time you pair and connect the SmartWatch 3 with a new phone or tablet, the procedure can take several minutes.

! If your SmartWatch 3 has already been paired with another phone or tablet, you have to reset your SmartWatch 3 before pairing it with a new phone or tablet. For more information about resetting, see *To perform a factory data reset* on page 17.

Source: https://www-support-downloads.sonymobile.com/swr50/userguide_EN_SWR50_10.pdf, page 7

Cloud sync

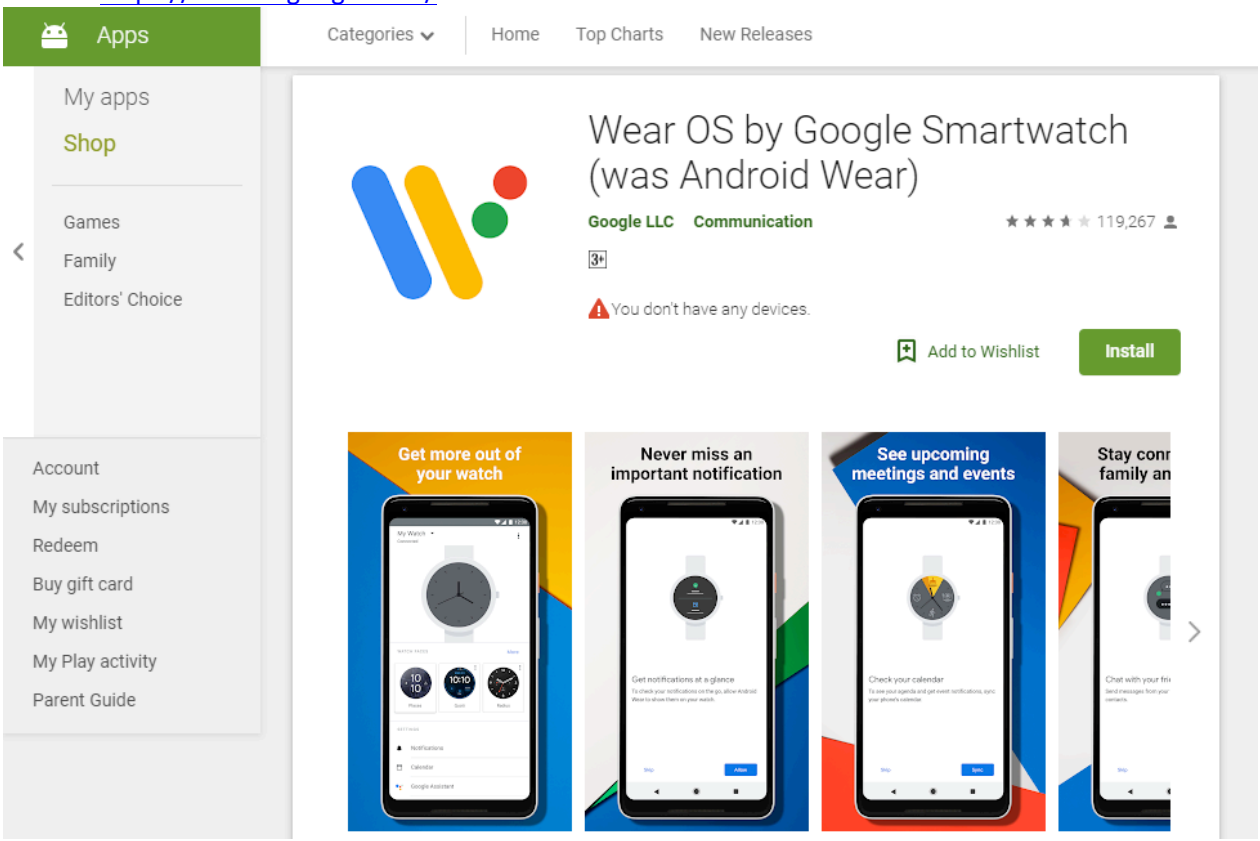
The Android Wear cloud sync service lets you share data between your SmartWatch 3 and your Android™ phone or tablet over the Internet. The data is saved on the Android Wear cloud sync server. Before you can use Wi-Fi® on your SmartWatch 3, you need to turn on the cloud sync feature in the Android Wear application on your phone or tablet.

To turn on Cloud sync

1. Open the Android Wear application on your Android™ phone or tablet, then tap ⚙.
2. Find and tap **Cloud sync**.
3. Drag the slider to the **On** position.

Source: https://www-support-downloads.sonymobile.com/swr50/userguide_EN_SWR50_10.pdf, page 9

Source: https://wearos.google.com/



Source: https://play.google.com/store/apps/details?id=com.google.android.wearable.app&hl=en_US

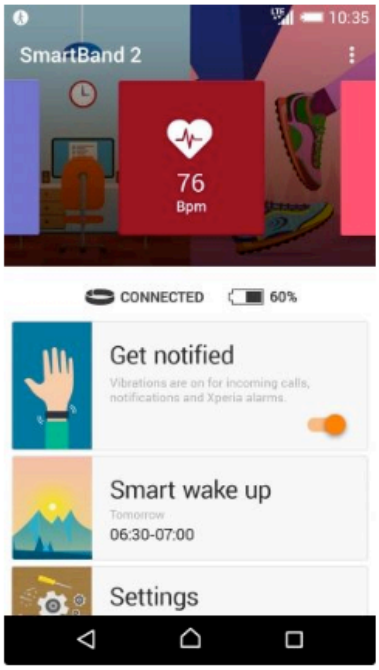
Bluetooth	Bluetooth is a wireless communication link, operating in the unlicensed ISM band at 2.4 GHz using a frequency hopping transceiver. It allows real-time AV and data communications between Bluetooth Hosts. The link protocol is based on time slots.
Bluetooth Baseband	The part of the Bluetooth system that specifies or implements the medium access and physical layer procedures to support the exchange of real-time voice, data information streams, and ad hoc networking between Bluetooth Devices.
Bluetooth Clock	A 28 bit clock internal to a BR/EDR Controller sub-system that ticks every 312.5µs. The value of this clock defines the slot numbering and timing in the various physical channels.
Bluetooth Controller	A generic term referring to a Primary Controller with or without a Secondary Controller.
Bluetooth Device	A device that is capable of short-range wireless communications using the Bluetooth system.

Source: https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc_id=282159, page 24

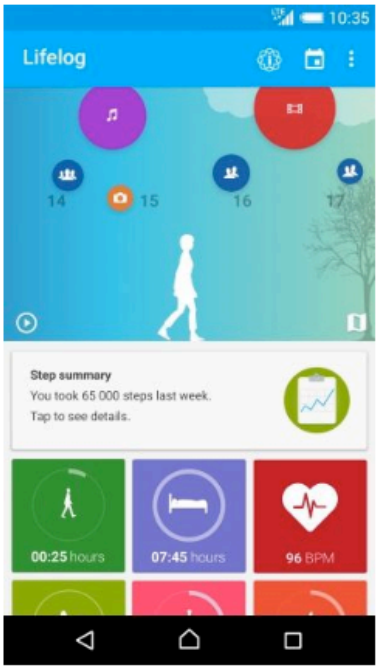
11. Based on present information and belief, Sony Mobile Communications makes, uses, sells and/or offers for sale a knowledge base comprising a registry identifying each physical device registered to deliver messages for transmission between said virtual devices and through said gateway. For example, Sony Mobile Communications and/or its customers utilize Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application to send and/or receive data between Sony Mobile Communications smartwatch which is connected via Bluetooth with the smartphone and the Google and/or Sony Mobile Communications sever which is connected to the smartphone via the internet. The Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application installed on the smartphone comprises a knowledge base registry to identify the registered physical devices. Further, the wearable transmits data between smartwatch operating on the Bluetooth protocol and the Google and/or Sony Mobile Communications server connected to the smartphone via the internet operating on Internet Protocol (IP) via the Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application. For example, Sony's smartwatch send a message and/or call using Wear OS by Google (formerly known as Android Wear) application operating on the Bluetooth protocol to the another smartphone and/or smart watches over the internet and/or network services.

Choose how you log

There are many ways to keep track of your SmartBand 2 activity data. For Android*** users, there's a dedicated host app to view recent data, or the Sony Lifelog app for a full timeline of heart rate data and statistics straight from your activity tracker. iOS users can download a host app that logs, analyzes, and stores all activity and heart data.



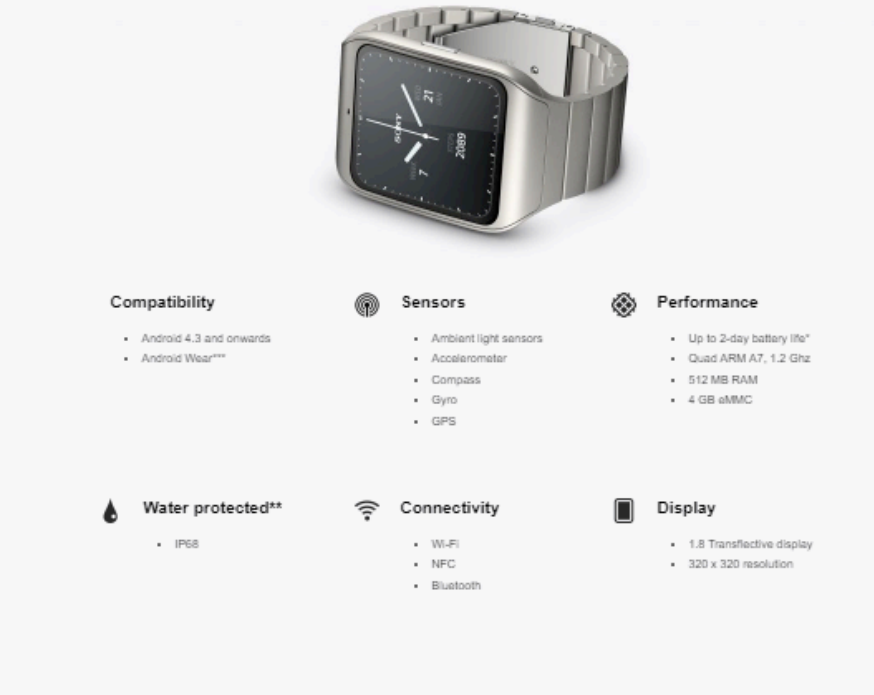
Android host app

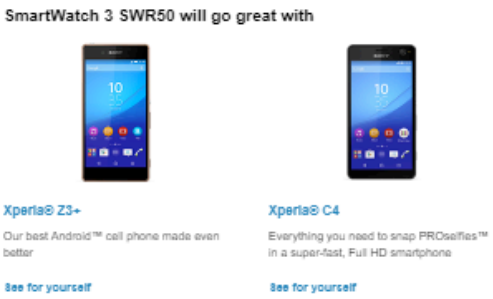


Sony Lifelog app

iOS host app

Source: https://www.sonymobile.com/us/products/smart-products/smartband-2/features/#tabs





Source: https://www.sonymobile.com/us/products/smart-products/smartwatch-3-swr50/

Bluetooth Device Address	A 48 bit address used to identify each Bluetooth device.
BR/EDR	Bluetooth basic rate (BR) and enhanced data rate (EDR).
BR/EDR Controller	A term referring to the Bluetooth Radio, Baseband, Link Manager, and HCI layers.
BR/EDR Piconet Physical Channel	A Channel that is divided into time slots in which each slot is related to an RF hop frequency. Consecutive hops normally correspond to different RF hop frequencies and occur at a standard hop rate of 1600 hops/s. These consecutive hops follow a pseudo-random hopping sequence, hopping through a 79 RF channel set, or optionally fewer channels when Adaptive Frequency Hopping (AFH) is in use.
BR/EDR/LE	Bluetooth basic rate (BR), enhanced data rate (EDR) and low energy (LE)

Source: https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc_id=282159, page 24

Source: https://wearos.google.com/

3.1 CORE TRAFFIC BEARERS

The Bluetooth core system provides a number of standard traffic bearers for the transport of service protocol and application data. These are shown in Figure 3.2 on page 40 below (for ease of representation this is shown with higher layers to the left and lower layers to the right).

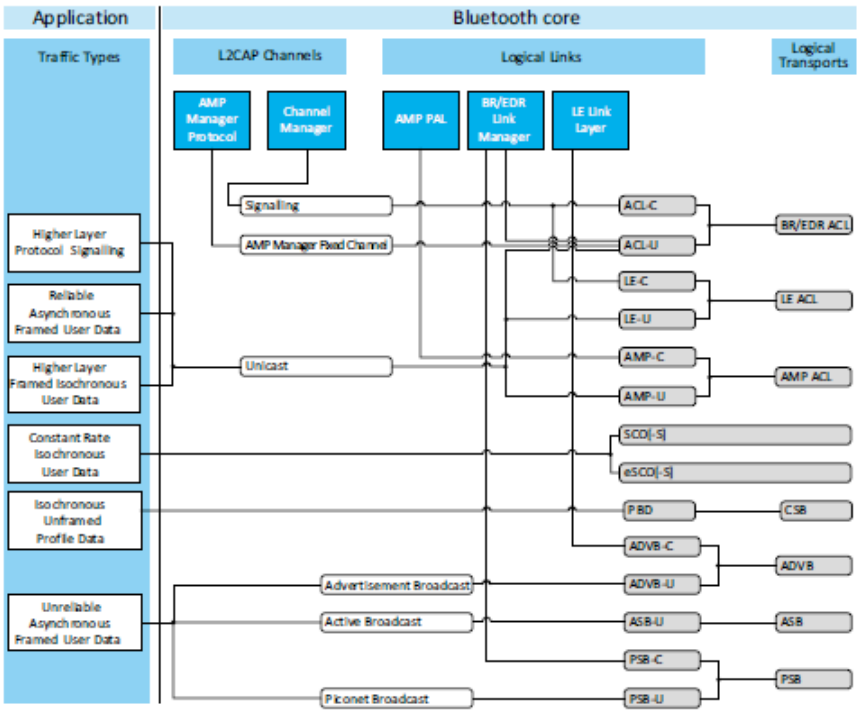


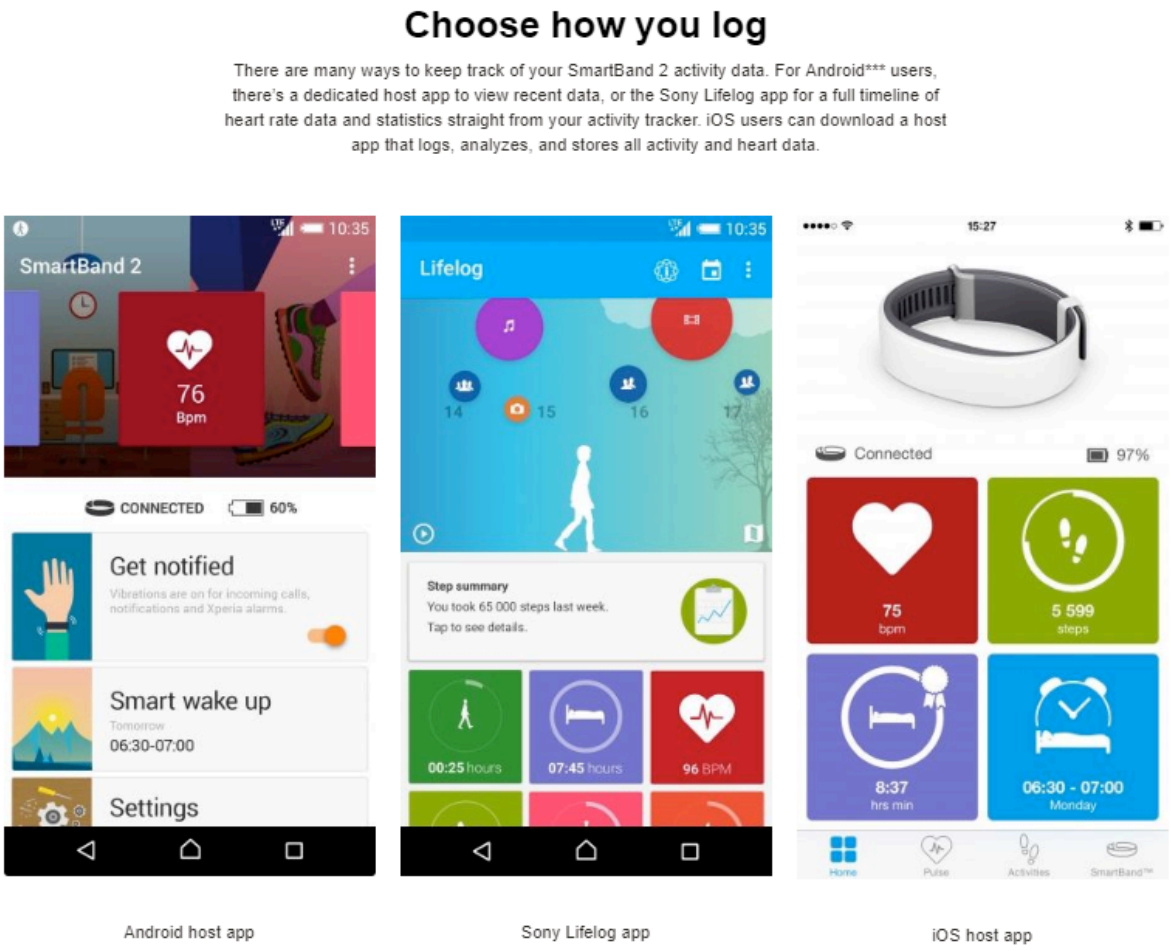
Figure 3.2: Bluetooth traffic bearers

Source: https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc_id=282159, page 40

Further, Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application also maintains a knowledge base comprising a registry identifying the phones and devices within the customers' network.

12. Based on information and belief, Sony Mobile Communications makes, uses, sells and/or offers for sale a logical table identifying each registered connection available between physical devices and protocol conversion information required for each registered connection to convert messages of one protocol to a different protocol. Upon information and belief, Sony Mobile Communications and/or its customers utilize Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application which comprises a logical table to identify the type of connection and selects Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile

Communications Lifelog smartphone application to convert data from Bluetooth protocol to IP and vice versa.



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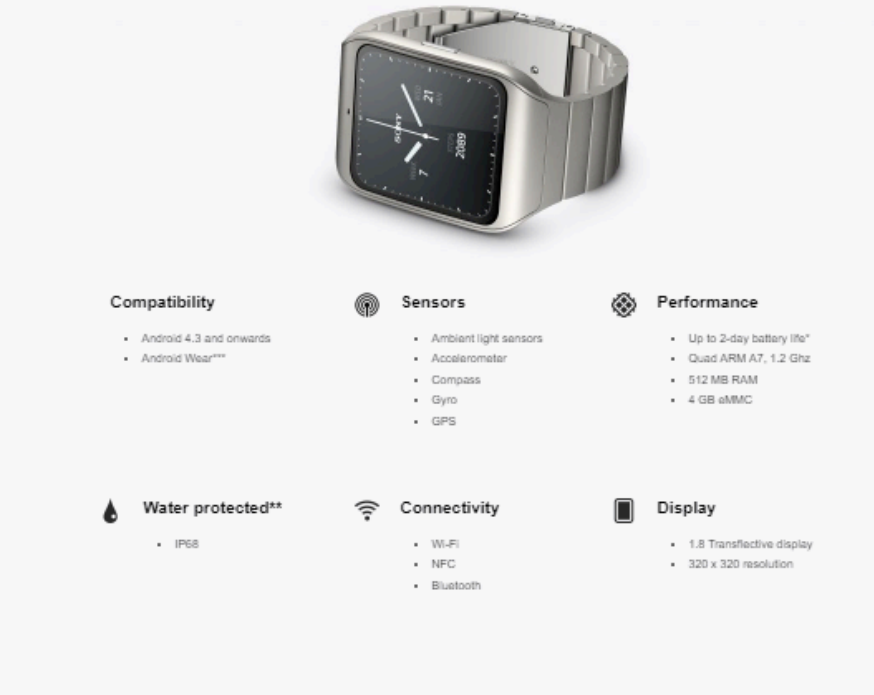

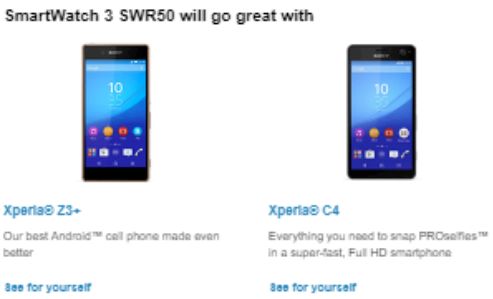

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BR/EDR/LE	Bluetooth basic rate (BR), enhanced data rate (EDR) and low energy (LE)

Source: https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc_id=282159, page 24

Viewing status icons

Your SmartWatch 3 displays status icons on the home screen. It shows, for example, the connection status of your accessory and the battery charge status.

Status icons

If your phone or tablet runs Android™ version 4.3 or 4.4, the following status icons may appear on the home screen of your SmartWatch 3:

	Your SmartWatch 3 is disconnected from your phone or tablet
	Theatre mode is activated
	Your SmartWatch 3 is muted
	The battery is charging
	Airplane mode is activated

If your phone or tablet runs Android™ version 5.0, the following status icons may appear on the home screen of your SmartWatch 3:

	Your SmartWatch 3 is disconnected from your phone or tablet
	Theatre mode is activated
	Silent mode is activated
	Only allow priority interruptions
	The battery is charging
	Airplane mode is activated

Source: https://www-support-downloads.sonymobile.com/swr50/userguide_EN_SWR50_10.pdf, page 14

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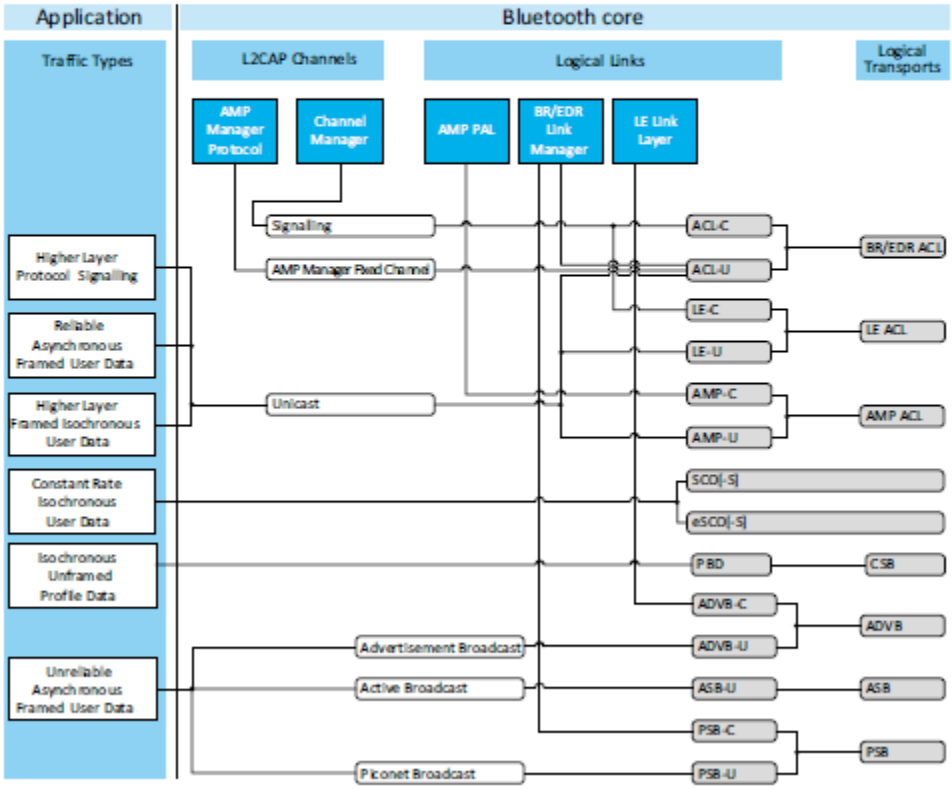

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Source: https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc_id=282159, page 40

Source: https://wearos.google.com/

13. Based on present information and belief, Sony Mobile Communications makes, uses, sells and/or offers for sale a dynamic database identifying the current status of each actual connection between physical devices. For example, Sony Mobile Communications and/or its customers utilize Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application which comprises a dynamic database to identify the current status of connection between the physical devices (including Smartwatches and the Fitness Bands).

Choose how you log

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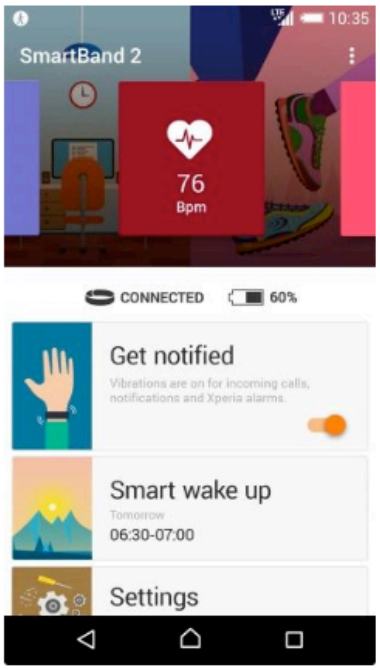
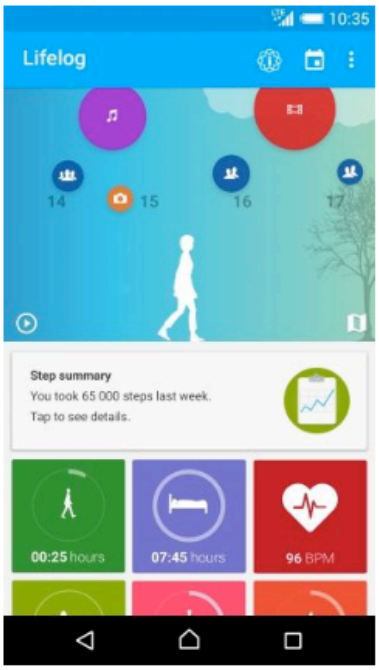


Android host app



Sony Lifelog app

iOS host app

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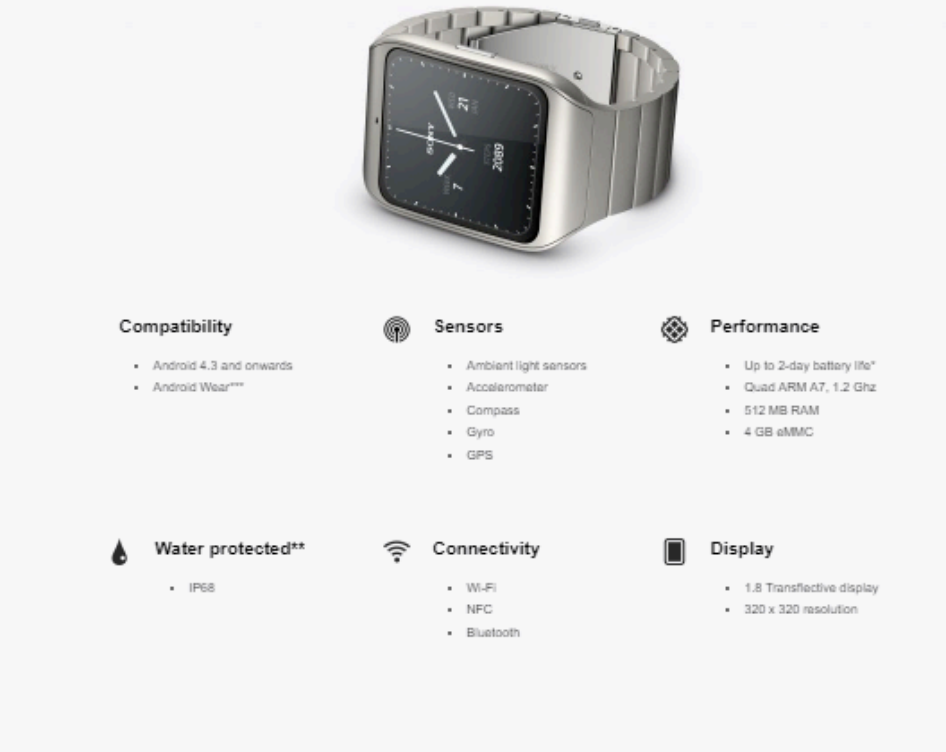

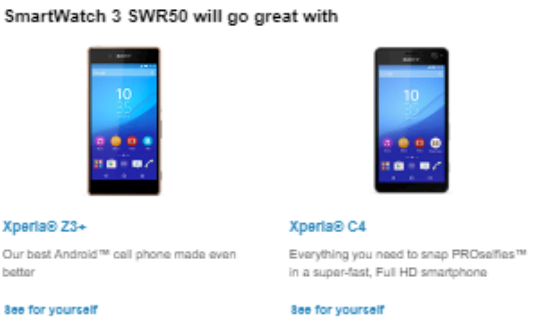

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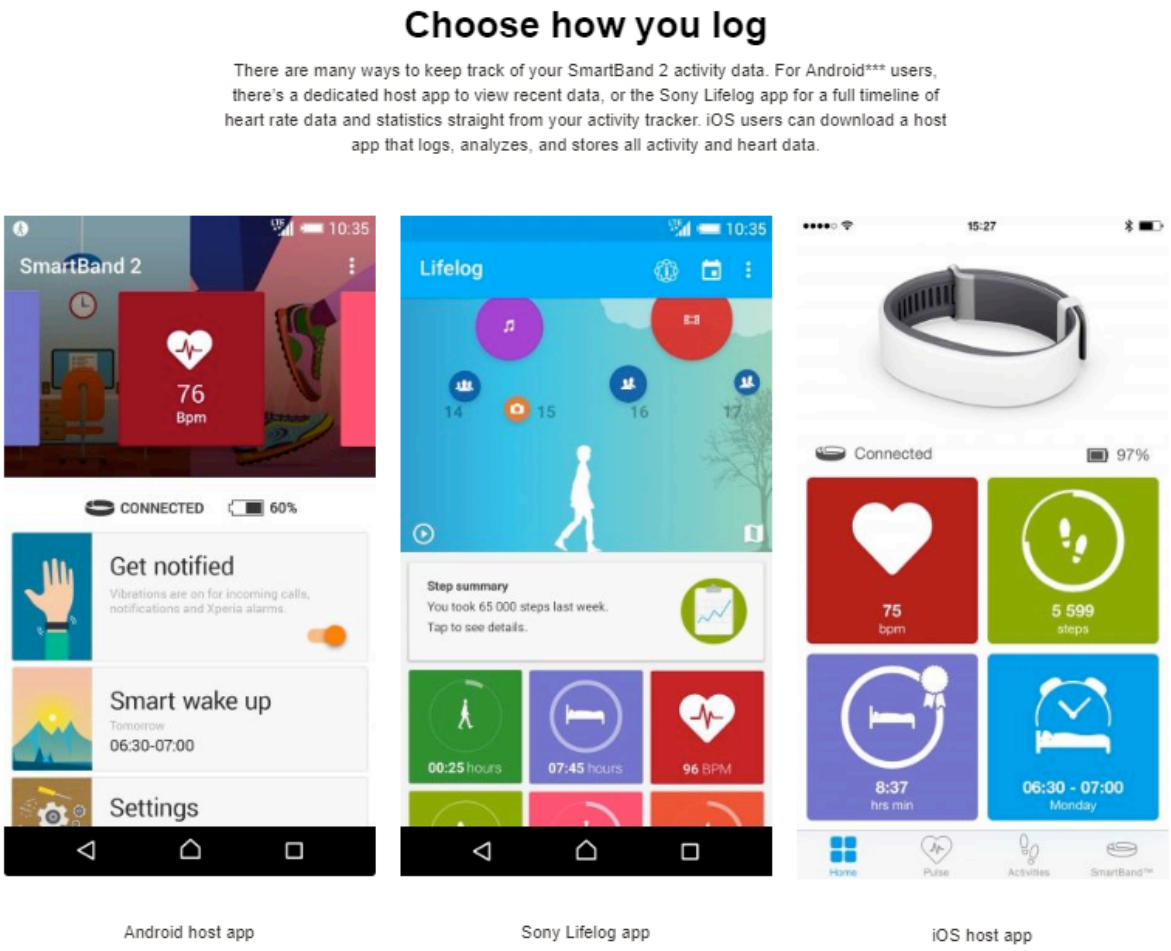
Source: https://www-support-downloads.sonymobile.com/swr50/userguide_EN_SWR50_10.pdf, page 14

14. Based on present information and belief, Sony Mobile Communications makes, uses, sells and/or offers for sale a virtual gateway accessing said knowledge base for protocol conversion information upon receipt of a message to be transmitted between said virtual devices. For example, Sony Mobile Communications and/or its customers utilize Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application comprising a virtual gateway which uses the Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application as a gateway for protocol conversion upon receiving the data to be transmitted between Sony Mobile Communications smartwatch which is connected via

Bluetooth with the smartphone and the Google and/or Sony Mobile Communications sever which is connected to the smartphone via the internet.



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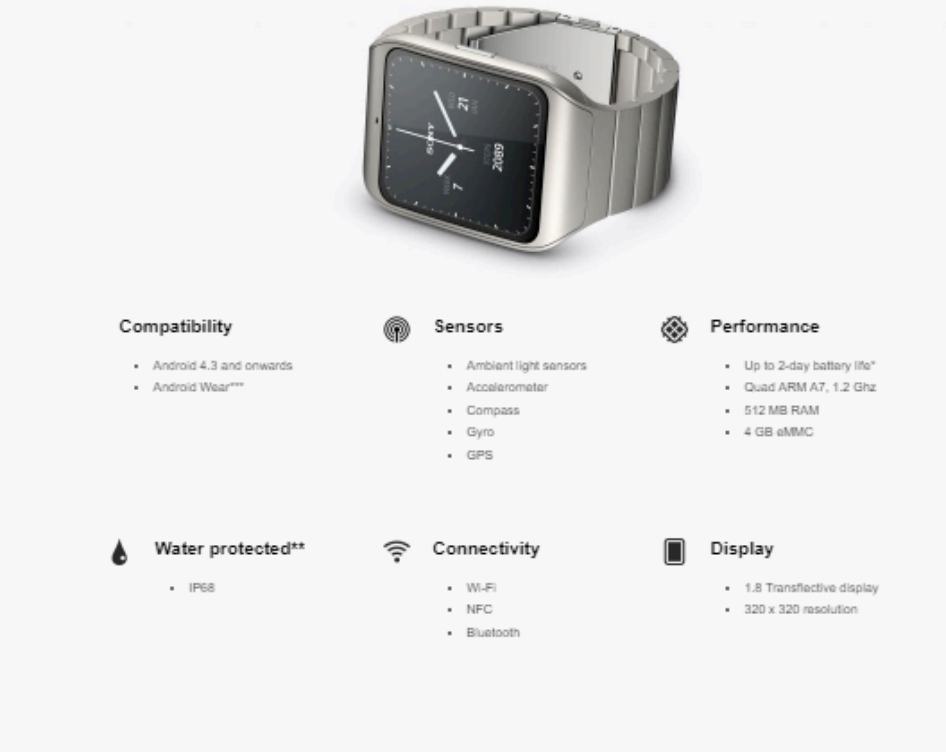

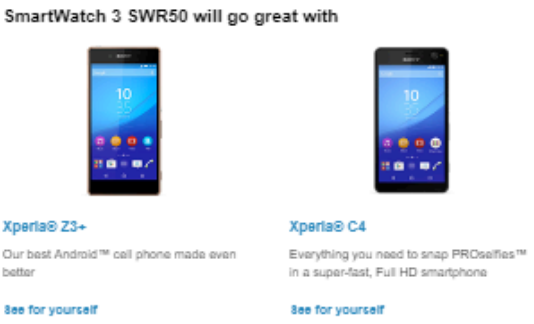

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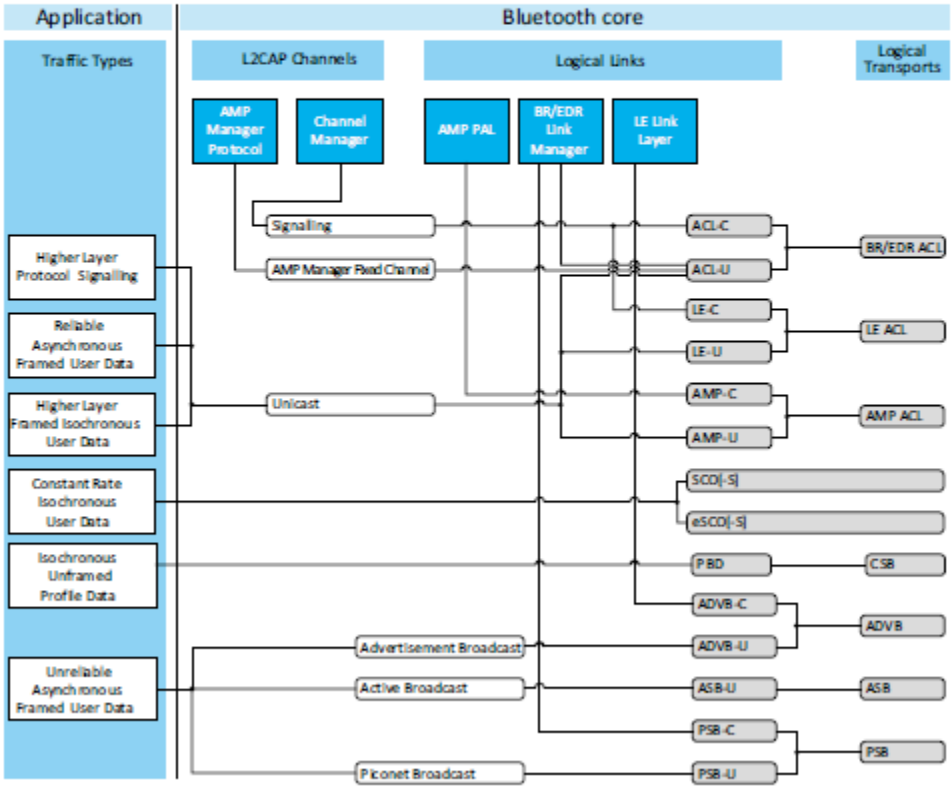


Figure 3.2: Bluetooth traffic bearers

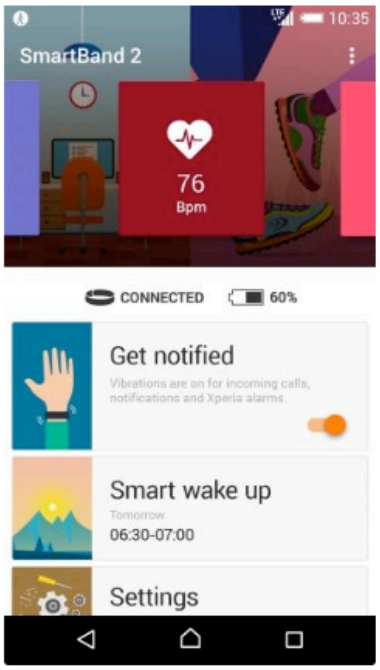
Source: https://www.bluetooth.org/DocMan/handlers/DownloadDoc.ashx?doc_id=282159, page 40

Source: https://wearos.google.com/

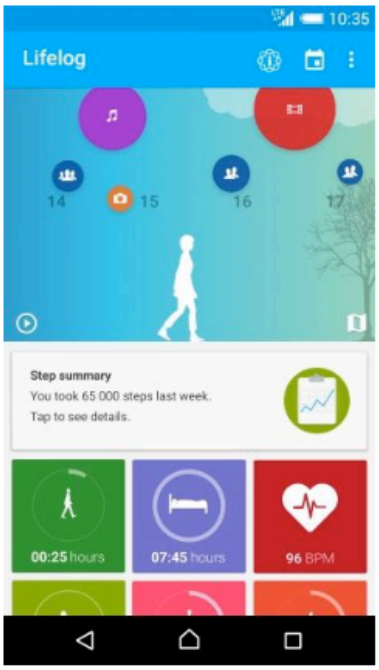
15. Based on present information and belief, Sony Mobile Communications makes, uses, sells and/or offers for sale a virtual gateway converting the protocol of said message to a protocol compatible with the network to which said message is being sent. For example, Sony Mobile Communications and/or its customers utilize Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application comprising a gateway which converts the protocol of the data sent from Sony Mobile Communications smartwatch which is connected via the Bluetooth with the smartphone to the Google and/or Sony Mobile Communications sever which is connected to the smartphone via the internet working on internet protocol.

Choose how you log

There are many ways to keep track of your SmartBand 2 activity data. For Android*** users, there's a dedicated host app to view recent data, or the Sony Lifelog app for a full timeline of heart rate data and statistics straight from your activity tracker. iOS users can download a host app that logs, analyzes, and stores all activity and heart data.



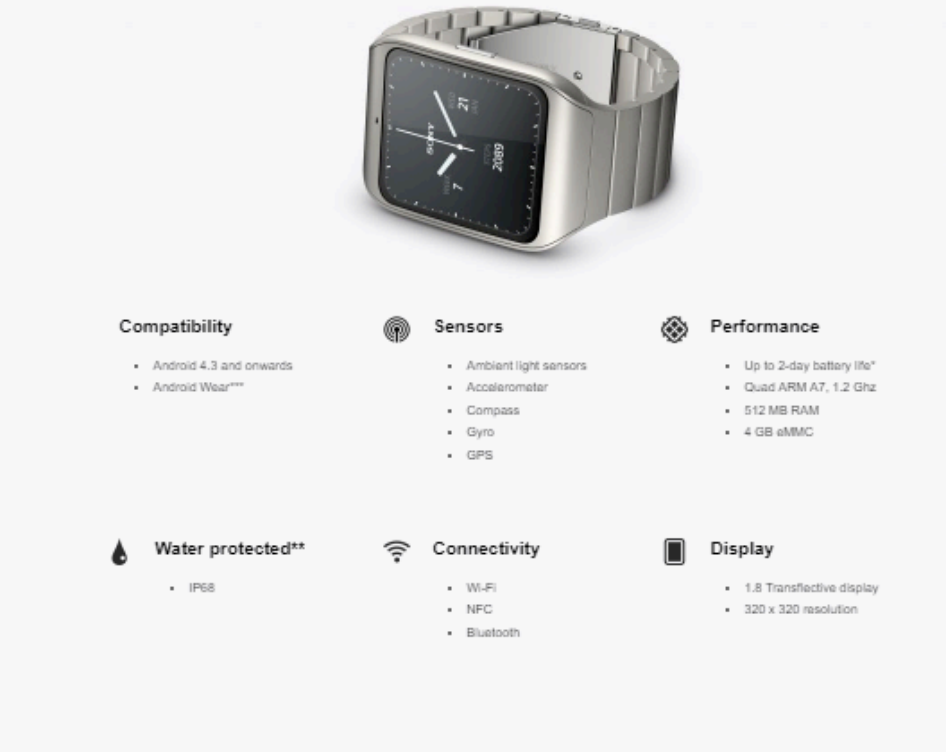
Android host app



Sony Lifelog app

iOS host app

Source: https://www.sonymobile.com/us/products/smart-products/smartband-2/features/#tabs



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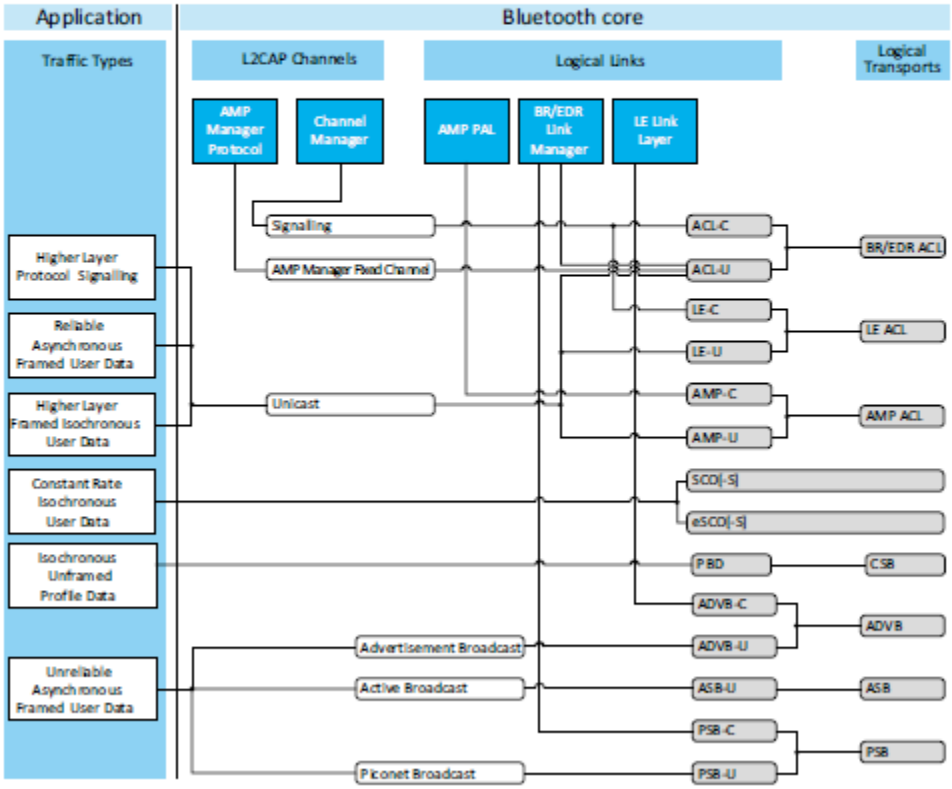

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Source: https://wearos.google.com/

16. Based on present information and belief, Sony Mobile Communications makes, uses, sells and/or offers for sale a virtual gateway wherein said virtual gateway updates the protocol conversion information and the current status information in said knowledge base based on message traffic there through. Upon information and belief, Sony Mobile Communications and/or its customers utilize Wear OS by Google (formerly known as Android Wear), Google Fit and/or Sony Mobile Communications Lifelog smartphone application which accesses and updates the information stored in the registry based on the communicating virtual devices via the virtual gateway.

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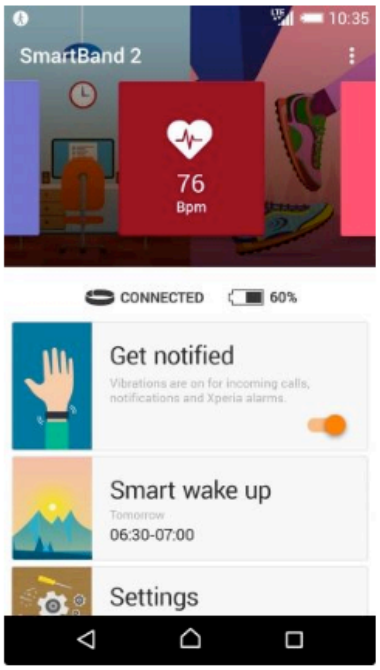

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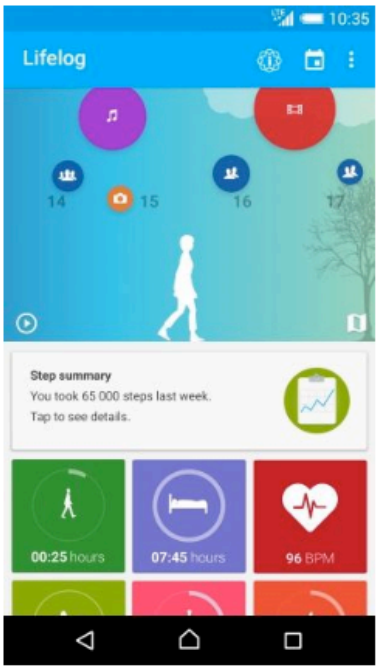

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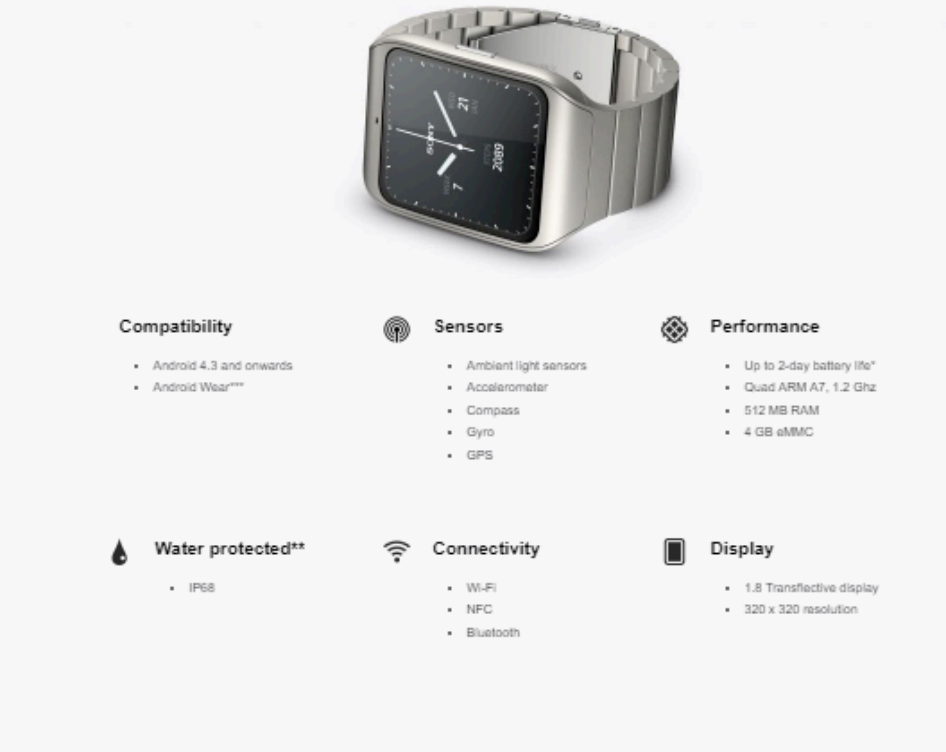

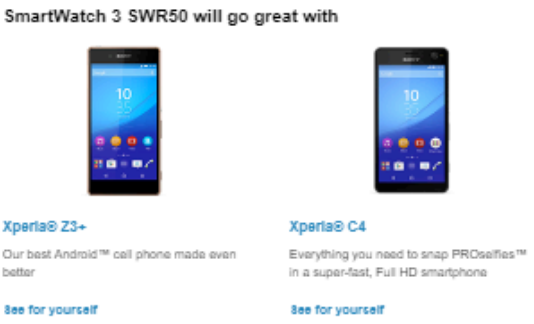

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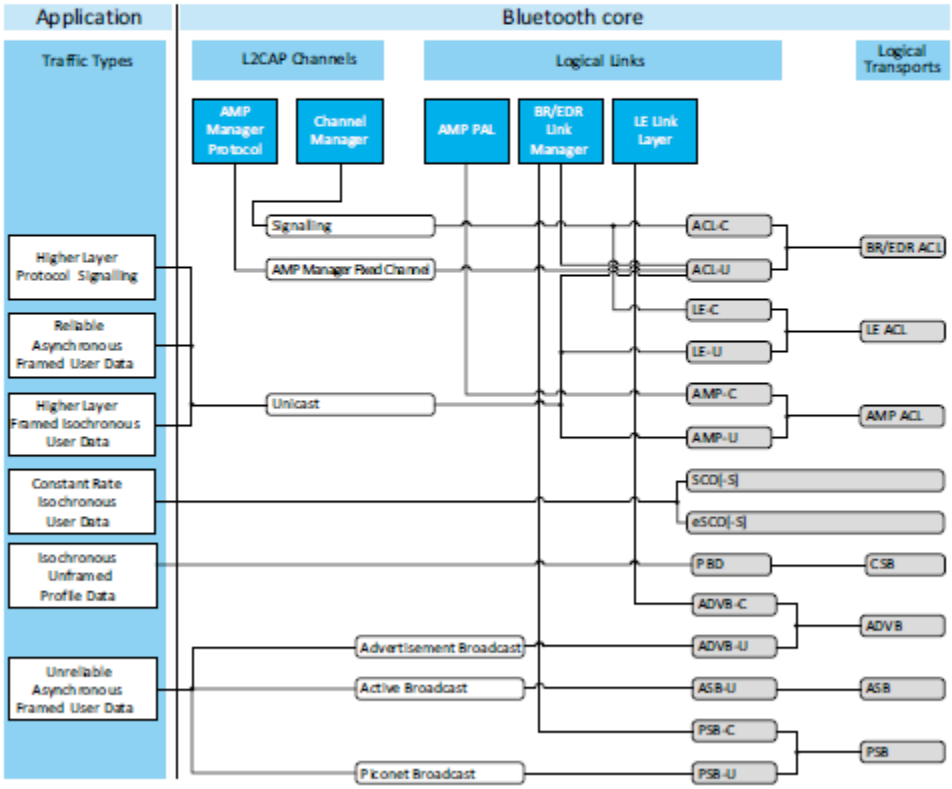

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17. In the alternative, because the manner of use by Defendant differs in no substantial way from language of the claims, if Defendant is not found to literally infringe, Defendant infringes under the doctrine of equivalents.

18. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

19. In addition to what is required for pleadings in patent cases, and to the extent any marking was required by 35 U.S.C. § 287, Plaintiff and all predecessors in interest to the '620 Patent complied with all marking requirements under 35 U.S.C. § 287.

20. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of the Defendant's wrongful acts 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.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Defendant has infringed the '620 Patent;

2. A judgment and order requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '620 Patent as provided under 35 U.S.C. § 284;

3. An award to Plaintiff for enhanced damages resulting from the knowing, deliberate, and willful nature of Defendant's prohibited conduct with notice being made at least as early as the date of the filing of this Complaint, as provided under 35 U.S.C. § 284;

4. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees; and

5. Any and all other relief to which Plaintiff may show itself to be entitled.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully Submitted,

BECK BRANCH LLC

Dated: July 1, 2018

By: __*/s/Stamatios Stamoulis*_____

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