IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

REEF MOUNTAIN LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
LIPPERT COMPONENTS, INC.,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	
	§	

ORIGINAL COMPLAINT

Plaintiff Reef Mountain LLC ("Plaintiff" or "Reef Mountain") files this Original Complaint against Lippert Components, Inc. ("Defendant" or "LCI") for infringement of United States Patent No. 8,239,481 (hereinafter "the '481 Patent").

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with its office address at 5570 FM 423, Suite 250-125, Frisco, TX 75034.

4. On information and belief, Defendant is a Delaware corporation with a principal address of 3501 County Road 6 East, Elkhart, IN 46514 and may be served through its registered agent, Corporation Service Company, at 251 Little Falls Drive, Wilmington, DE 19808.

5. On information and belief, this Court has personal jurisdiction over Defendant

because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District as it is a Delaware corporation.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO. 8,239,481)

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq*.

10. Plaintiff is the owner by assignment of the '481 Patent with sole rights to enforce the '011 Patent and sue infringers.

11. A copy of the '481 Patent, titled "System and method for implementing open-control remote device control," is attached hereto as Exhibit A.

12. The '481 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. The '481 Patent is generally directed to a system and method for implementing open-protocol remote control of various devices.

14. The '481 Patent claims are directed to both methods and computer-readable media.

15. The '481 Patent claims recite hardware and software components and/or functionality thereof, which is non-generic.

16. The '481 Patent claims recite elements and limitations directed specifically to inventive components and improvements in the workings of computers.

17. The claims of the '481 Patent are directed to specific improvements in computer technology. For example, with respect to the prior art, the '481 Patent notes: "Often, to manipulate a particular device, or obtain data from the device, the device requires some form of control/instruction from a proprietary user interface and/or proprietary protocol." '481 Patent, 1:24-17. And, "a single manufacturer may utilize different protocols for the different model devices or even different versions of the same model of device." *Id*., 1:31-33.

18. The '481 Patent notes problems with conventional systems in communicating with different devices that have device specific and/or proprietary communication protocols. As stated:

> [I]n the event a network supports multiple networked devices, an authorized user within the network can utilize each individual manufacturer-provided user interface, such as a proprietary graphical user interface, to communicate with the respective hardware device. ***However, as the number of devices connected to the network increases, maintaining each user interface becomes problematic***. For example, a user, Such as a security monitor, must receive training and be proficient in each type of proprietary user interface. Additionally, the size and/or usability of a central control panel, such as a computer display screen, having each user interface display can become burdensome. Still further, the ability of a user to implement a common task, such as the activation of all the cameras, must be executed individually, one interface at a time.

'481 Patent, 35-49 (Emphasis added). Other problems with conventional networks and systems are discussed in the remainder of the Background of the '481 Patent. '481 Patent, 1:50-2:21.

19. The claims of the '481 Patent present methods and systems that solve problems with conventional networks by, among other things, presenting a user with a user interface that allows the user to select from among multiple devices, enter commands in a standard-protocol language, and have those instructions translated to device-specific protocol instructions and delivered to the appropriate device(s).

> A system and method for implementing open-protocol remote device controls are provided. A user accesses a common user interface for controlling one or more networked monitoring devices. Utilizing the interface, the user administrator selects one or more actions. The selection is encoded in a common general language and transmitted to a device server. The device server obtains the selection, accesses a device interface database and translates the selection into a device-specific protocol. The translated instruction is transmitted to the selected device for implementation. The user interface then obtains any device return data for display on the user interface.

'481 Patent, 2:31-43.

20. The claims of the '481 Patent recite functionality that is not provided by a generic computing platform. At least some of this functionality can only be performed by special-purpose computers.

21. The claims of the '481 Patent recite functionality involving the translation of commands from standard-protocol languages to device-specific languages, and back. This functionality, by definition, suggests the use of specialized computers.

22. As noted in the specification,

> In accordance with an illustrative embodiment of the present invention, the standard protocol utilized by the control application 226 is a generic language capable of controlling basic device activity that is generally common to a particular type of device. For instance, most cameras are capable of pan, tilt, or Zoom activity, allowing the device to pan left or right, tilt up or down, or Zoom near or far. The standard protocol encodes the users instructions in an established standard language rather than a manufacturer-specific protocol. Accordingly, the control application 226 is not required to maintain, or otherwise, any manufacturer-specific protocols.

'481 Patent, 9:63-10:7. And,

> Upon receiving the standard protocol encoded instructions, the premises server 230 identifies the targeted device and translates the instructions into device specific protocol instructions. In an illustrative embodiment of the present invention, the device interface database 232 maintains information correlating the standard control instructions and a corresponding device-specific protocol. The premises server 230 then transmits the device specific control instruction to the targeted device, or devices. The device 234, 236 executes the device specific instruction and returns a result of the execution back to the premises server 230. In an illustrative embodiment of the present invention, the result from the premises server 230 can also be translated into a standard protocol by the premises server 230, in the event

> the output is proprietary to the device. Alternatively, a device may also send the executing result back to the viewer application 228 directly if the device can generate the executing results in the standard protocol.

'481 Patent, 10:17-34.

23. On information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claims 1, 9, 12, 13, 15, 17, 26, 30, 31, 32, 35, 37, 40, 44, 45, and 46 of the '481 Patent by making, using, importing, selling, and/or offering devices and methods for controlling devices in a computer system, which are covered by at least Claims 1, 9, 12, 13, 15, 17, 26, 30, 31, 32, 35, 37, 40, 44, 45, and 46 of the '481 Patent. Defendant has infringed and continues to infringe the '481 Patent directly in violation of 35 U.S.C. § 271.

24. Defendant sells, offers to sell, and/or uses (including by at least testing) appliance control devices and/or systems including, without limitation, the OneControl App, and any similar products ("Product"), which infringe at least Claims 1, 9, 12, 13, 15, 17, 26, 30, 31, 32, 35, 37, 40, 44, 45, and 46 of the '481 Patent. The Product enables a user to control various appliances that utilize different device-specific protocol instruction through an interface by encoding selected appliance operations according to a standard communication protocol instruction.

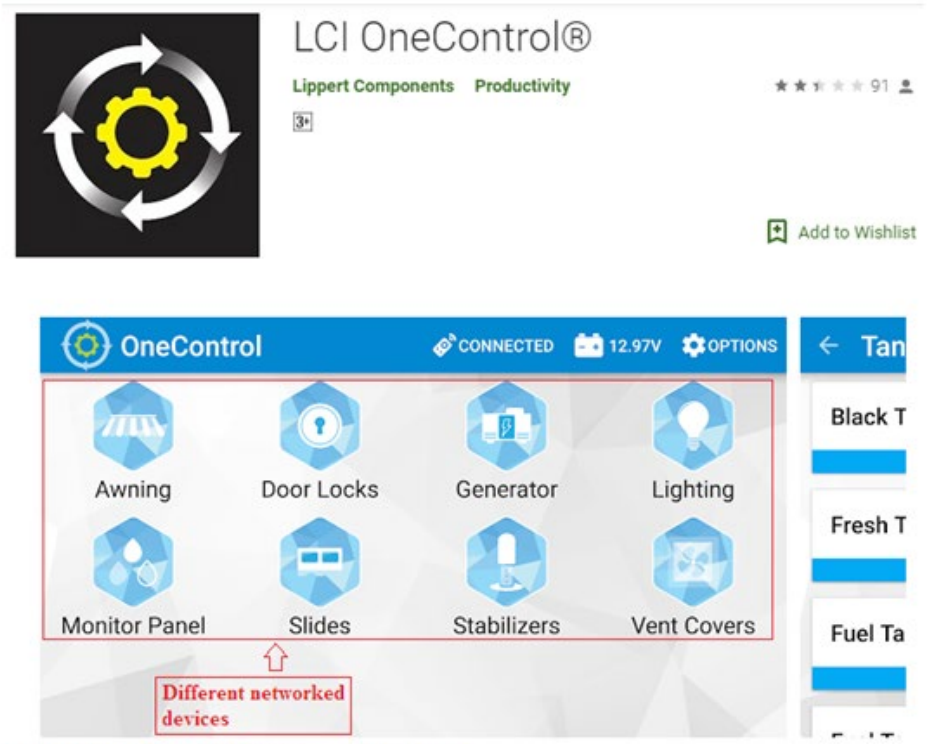
25. In at least testing and usage, the Product implements a communication method for controlling devices in a computer system. The Product obtains a user selection (e.g., selection of smart appliances which a user wants to control. For example, the user can select lights, thermostat, etc.) of one or more of a plurality of networked devices (e.g., smart appliance such as lights, tanks, levelers, etc.) to be manipulated from a user interface (e.g., OneControl app interface), wherein at least one of the plurality of networked devices requires device-specific protocol instructions that are different from protocol instructions required by at least one of the other plurality of networked devices. The OneControl app can control, by means of a smartphone, multiple types of devices (e.g., smart appliances like lights, tanks, levelers, etc.) which have different functionalities, and

therefore, on information and belief must have different software operating instructions that correspond to their differentiated functions (e.g., different device-specific protocol instructions). Certain aspects of these elements and limitations are illustrated in the screen shots below and/or in screen shots provided in connection with other allegations herein.

ONEControl

Leave old manual processes in the dust with OneControl® technology. OneControl technology lets RVers control and monitor their many RV systems, all from the unit's digital touchscreen or your smartphone.

https://www.lci1.com/onecontrol



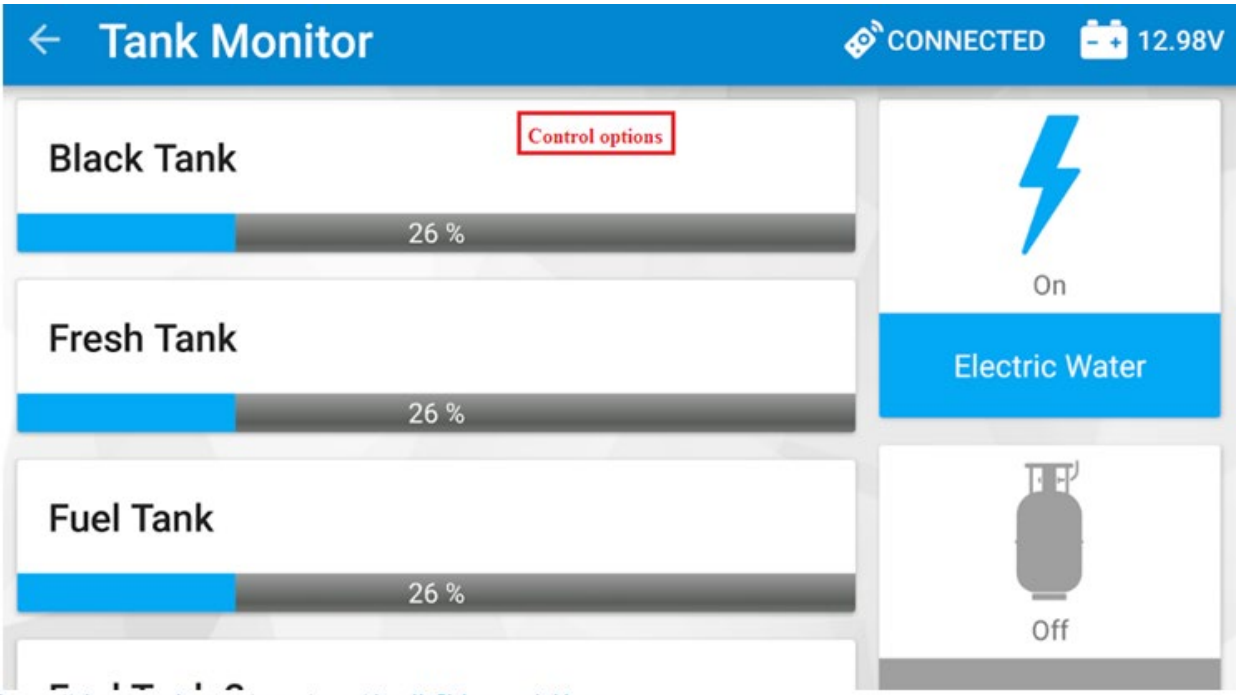
https://play.google.com/store/apps/details?id=com.lci1.one

The OneControl® mobile application by Lippert Components® (LCI®) puts the power into your hands to remotely control and monitor your myRV Wi-Fi and Bluetooth-enabled LCI products using a tablet, smartphone or another smart device. Operate your leveling system, lights, bedroom slide-out, power awning and more with just the push of a button. One Control also allows you to check water tank levels, battery levels, and temperature. Features will be added regularly as the LCI product line continues to expand.

One Control remotely controls and monitors:

- RV auto-leveling systems
- Power jacks and stabilizers
- Interior and exterior lights
- RV slide-out rooms
- Power awnings
- Generator
- TV and bed lifts
- HVAC thermostat
- Gas and electric water heaters
- Water and fuel tanks
- Back-up camera systems
- Water pumps
- Kitchen and bathroom vents and vent covers
- Automatic door locks
- TV, radio and DVD systems
- Automatic fireplace control

https://play.google.com/store/apps/details?id=com.lci1.one



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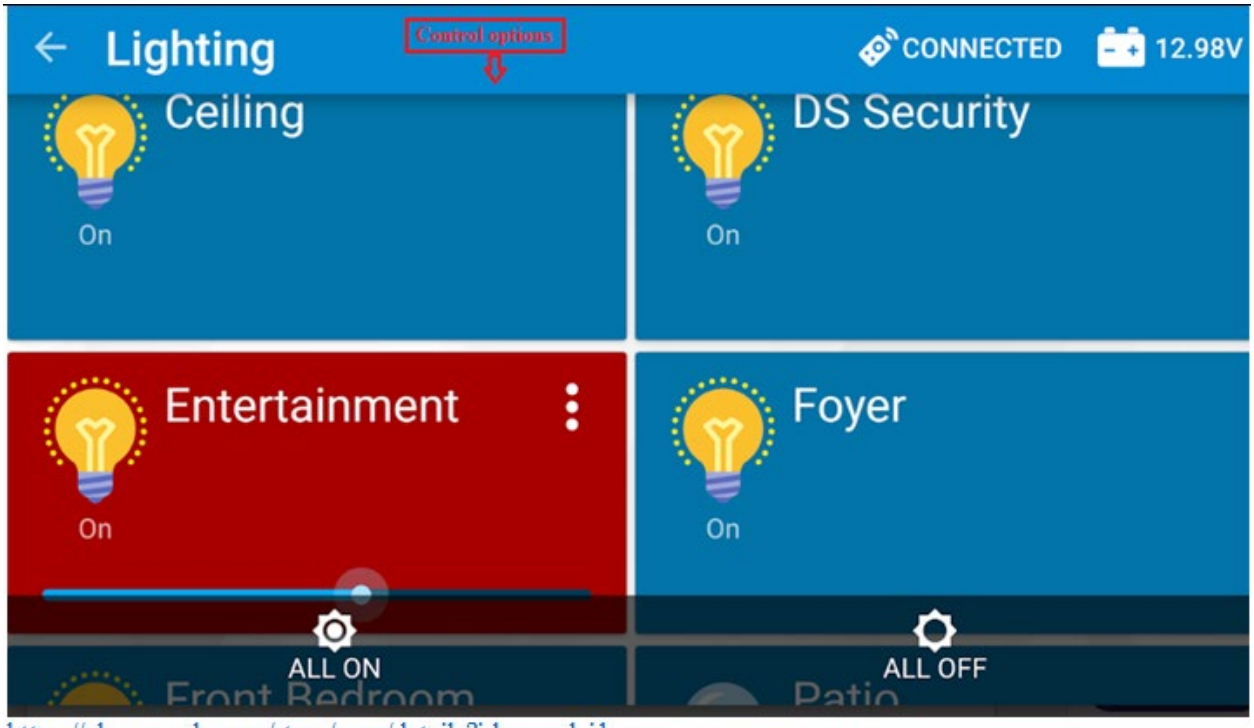

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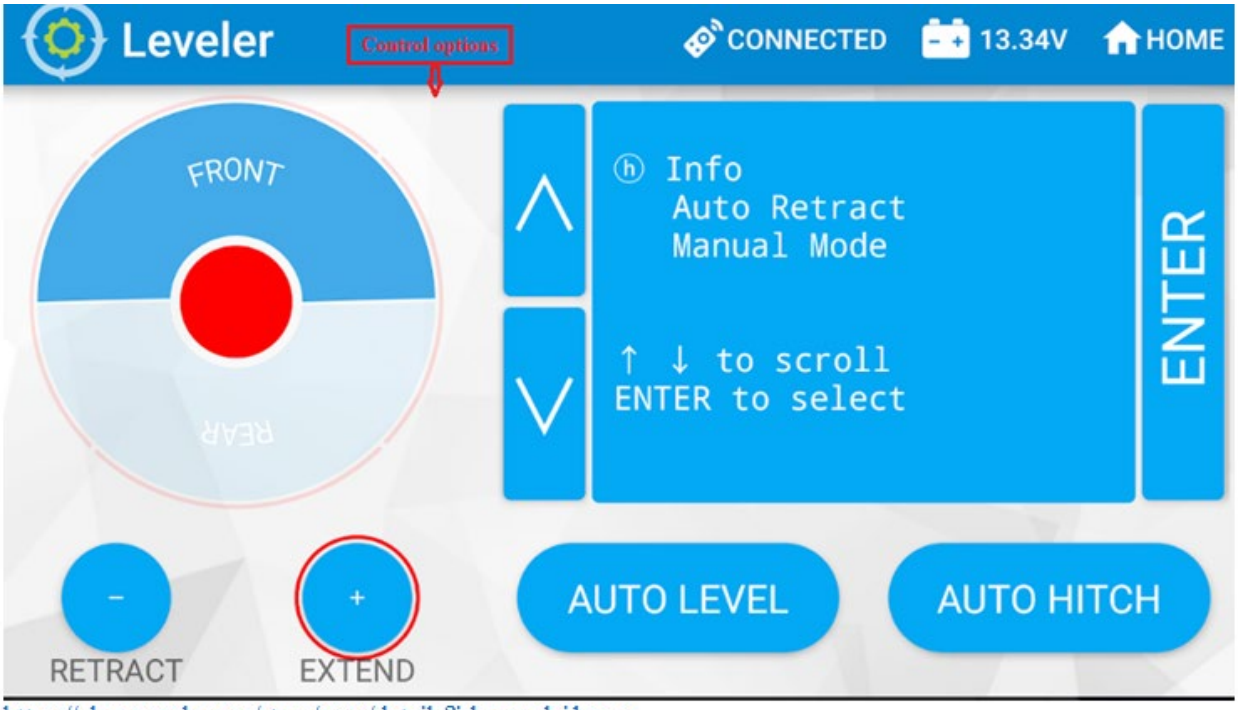

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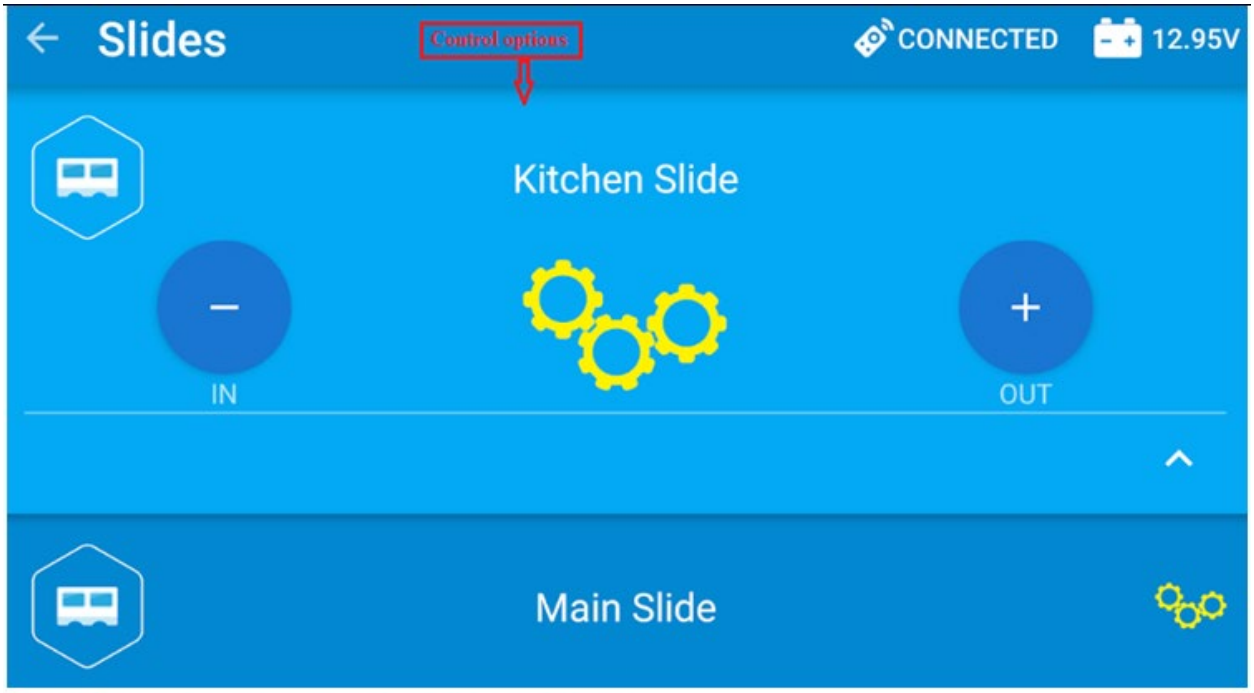

https://play.google.com/store/apps/details?id=com.lci1.one

26. In at least testing and usage, the Product obtains a user interface application (e.g., OneControl smartphone app) corresponding to the selected one or more networked devices (e.g., smart appliance such as lights, thermostat, etc.). Certain aspects of these elements are illustrated

in the screen shots provided in connection with other allegations herein.

27. In at least testing and usage, the Product transmits, to at least one user interface selection device, the user interface application (e.g., smartphone with the OneControl App installed) corresponding to the selected one or more networked devices (e.g., the OneControl application will display a user interface that can be used to control corresponding smart appliances) so that the user interface (e.g., OneControl smartphone app) can be displayed on the at least one user interface selection device (e.g., a smartphone with the OneControl application installed). Certain aspects of these elements are illustrated in the screen shots provided in connection with other allegations herein.

28. In at least testing and usage, the Product obtains a user selection of an operation (e.g., settings of the device being controlled) corresponding to at least one selected networked device (e.g., smart appliances, lights, tanks, levelers, etc.). Certain aspects of these elements are illustrated in the screen shots provided in connection with other allegations herein.

29. On information and belief, in at least testing and usage, the Product encodes the selected operation (e.g., a user's selection of a particular setting or control pertaining to a particular device) according to a standard communication protocol instruction (e.g., a standard protocol utilized by the OneControl system to encode all user instructions to a format appropriate for transmittal to the OneControl server and/or host over the Internet). Because the OneControl system utilizes a single application interface to control a multitude of devices, it is inherent that the application utilizes a common communication protocol to encode all user instructions originating from the OneControl App. The fact that a OneControl server and/or host device parses all of the said instructions or settings further supports the conclusion that a single communication protocol is utilized by the OneControl App to transmit settings and/or settings. This standard

communication protocol could be any Internet Protocol or proprietary OneControl protocol appropriate for the transmittal of controls/settings from the mobile application to the server/host via the Internet. Certain aspects of these elements are illustrated in the screen shot below and/or in screen shots provided in connection with other allegations herein.

The Protocol

IP is a protocol. Simply said, a protocol is a set of rules governing how things work in a certain technology so that there is some kind of standardization. When put into a network communication context, an internet protocol describes how data packets move through a network.

When you have a protocol, you are sure that all machines on a network (or in the world, when it comes to the internet), however different they might be, speak the same "language" and can integrate into the whole framework.

The IP protocol standardizes the way machines over the Internet or any IP network forward or route their packets based on their IP addresses.

https://www.lifewire.com/internet-protocol-explained-3426713

30. The Product transmits the selected standard protocol instruction (e.g., user input settings or controls that have been encoded utilizing a standard communication protocol) to a server (e.g., server and/or host device) corresponding to the selected networked device (e.g., smart appliances connected to server and/or host). Certain aspects of these elements are illustrated in the screen shots provided in connection with other allegations herein.

31. On information and belief, the Product obtains an output (e.g., the actual carrying out of controls or settings by a particular device; for example, the retrieval of status data from a device and/or device settings) corresponding to the selected operation (e.g., the user input control and/or setting) of the selected networked device (e.g., smart appliances or other connected device). On information and belief, the OneControl server and/or host will receive commands and or settings originating from a mobile device, those commands or settings having been encoded

utilizing a standard communication protocol that is appropriate for data transmission over a network (e.g., the Internet). The server and/or host will then parse said data to determine the appropriate commands/instructions to send to a particular device so that the desired setting/control can be carried out (e.g., the appropriate OneControl proprietary protocol command). Certain aspects of these elements are illustrated in the screen shots provided in connection with other allegations herein.

32. Regarding Claim 9, the output includes data indicative of the network device status (e.g., device settings).

33. Regarding Claim 12, the standard communication protocol is device independent (e.g., the communication protocol utilized for data transmission to the server and/or host is independent of any protocols used for direct communication with actual devices and is universally used to transmit controls and settings across all of the different devices).

34. Regarding Claim 13, the user interface is a web-based graphical user interface (e.g., a smartphone app interface which controls through a network such as the Internet).

35. Regarding Claim 15, obtaining a user selection of an operation (e.g., settings of the device being controlled) corresponding to at least one selected networked device (e.g., smart appliances, lights, tanks, levelers, etc.) includes obtaining a user manipulation of a graphical icon.

36. Regarding Claim 17, the Product includes a computer-readable medium having a computer executable program therein for performing the method of controlling devices in a computer system. The method steps are as described in connection with Claim 1 and as illustrated in the screen shots provided in connection with other allegations herein.

37. Regarding Claim 26, the output includes data indicative of a networked device status. This is described in connection with Claim 9 and as illustrated in the screen shots provided

in connection with other allegations herein.

38. Regarding Claim 30, the standard communication protocol is device independent. This is described in connection with Claim 12 and as illustrated in the screen shots provided in connection with other allegations herein.

39. Regarding Claim 31, the user interface is a Web-based graphical user interface. This is described in connection with Claim 13 and as illustrated in the screen shots provided in connection with other allegations herein.

40. Regarding Claim 32, obtaining a user selection of an operation corresponding to at least one selected networked device includes obtaining a user manipulation of a graphical icon. This is described in connection with Claim 15 and as illustrated in the screen shots provided in connection with other allegations herein.

41. Regarding Claim 35, the Product provides a method of controlling devices in a computer system. The method steps are as described in connection with Claim 1 and as illustrated in the screen shots provided in connection with other allegations herein.

42. Regarding Claim 37, the selected networked device is a monitoring device. This is described in connection with Claim 3 and as illustrated in the screen shots provided in connection with other allegations herein.

43. Regarding Claim 40, the output includes data indicative of a networked device status. This is described in connection with Claim 9 and as illustrated in the screen shots provided in connection with other allegations herein.

44. Regarding Claim 44, the standard communication protocol is device independent. This is described in connection with Claim 12 and as illustrated in the screen shots provided in connection with other allegations herein.

45. Regarding Claim 45, the user interface is a Web-based graphical user interface. This is described in connection with Claim 13 and as illustrated in the screen shots provided in connection with other allegations herein.

46. Regarding Claim 46, obtaining a user selection of an operation corresponding to at least one selected networked device includes obtaining a user manipulation of a graphical icon. This is described in connection with Claim 15 and as illustrated in the screen shots provided in connection with other allegations herein.

47. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

48. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

49. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 7,797,011 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: October 31, 2018

Respectfully submitted,

DEVLIN LAW FIRM LLC

/s/ Timothy Devlin

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