

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CIRCUIT VENTURES LLC,

Plaintiff,

vs.

SCOUT SECURITY, INC.,

Defendant.

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Case No:

JURY TRIAL DEMANDED

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Circuit Ventures LLC (“Plaintiff” or “CV”), by and through its attorneys, files this Original Complaint against Scout Security, Inc. (“Defendant” or “Scout”) for infringement of United States Patent Nos. 7,256,683 (“the ‘683 Patent”); 7,834,744 (“the ‘744 Patent”); 8,816,869 (“the ‘869 Patent”); and 8,912,893 (“the ‘893 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 Delaware LLC, with an office address of 825 Watters Creek Blvd., Building M, Suite 250, Allen, TX 75013.

4. Upon information and belief, Defendant is a Delaware corporation with a place of business located at 210 N. Racine Ave. Suite 2m, Chicago, IL 60607. 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.

5. Upon 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**

6. On information and belief, 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.

**COUNT I**  
**(INFRINGEMENT OF UNITED STATES PATENT NO. 7,256,683)**

7. Plaintiff incorporates paragraphs 1 through 6 herein by reference.

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

9. Plaintiff is the owner by assignment of the '683 Patent with sole rights to enforce the '683 patent and sue infringers.

10. A copy of the '683 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit A.

11. The '683 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

12. The claims of the '683 Patent recite a flexible system that can reproduce the function of a typical security management system. '683 Patent, 3:14-16. Typical systems are proprietary and components from one system will not work with components from another system. Additionally, any modifications to the hardware or software of a typical system usually must be done by the original manufacturer. *Id.*, 1:16-24. Further, each manufacturer of typical security management system equipment specifies a particular value of field resistance for the last

field device in a line of devices. *Id.*, 2:5-7. The problems with typical systems are especially apparent when an owner needs to upgrade or modify their system. *Id.*, 2:26-38.

Because each line connected to the system includes a field resistor of a particular value, the owner is forced to return to the original supplier of the SMS in order to provide an upgrade. Alternatively, the system owner must rewire each of the lines connected to the system and replace the field resistor with a different value, as specified by the supplier of the new SMS control unit. Where the resistor is built into the field device it cannot be changed and the system owner is forced to also replace each of the devices if it wants to change to a different brand of SMS control unit.

*Id.*, 2:27-38. And, typical systems include an operator interface which is proprietary and cannot be changed by the user. *Id.*, 2:38-45. The system claimed in the '683 Patent allows for the retrofit of existing security management systems while using the existing circuitry wiring of the typical legacy system. *Id.*, 4:9-16.

13. Claim 8, for example, recites:

Apparatus for monitoring the status of a measurable parameter of an electrical circuit, the apparatus comprising:

measurement means for measuring the magnitude of said parameter and generating an analog signal representative of said magnitude;

analog to digital conversion means for generating from said analog signal a count value representative of said magnitude;

comparison means for comparing said count value with a threshold value and generating from the comparison a status signal, said status signal having two possible values which thereby indicates whether the count value is greater than or less than said threshold value;

transmission means for transmitting said status signal via a communications network to a display; and

display means for displaying an indication of said assigned status.

'683 Patent, 9:48-64.

14. The components recited in the claims (such as in claim 8 for example) are

configured, such that they operate in a non-conventional manner.

15. The components recited in the claims (such as in claim 8 for example) are configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit). Generic processors cannot provide this functionality. As stated in the specification, “[t]he various threshold values . . . are preferably configured as variables which may be set as parameters of the EOL module. In this way, the EOL module may be configured to operate with a wide range of field resistors, thus enabling the EOL module to be retrofitted to a wide range of field circuits wherein the series and field resistors . . . already exist and cannot readily be changed.” ‘683 Patent, 7:1-8; see also *Id.*, 7:19-39 and 7:41-53.

Such . . . systems using EOL modules according to the present invention may be readily retrofitted to existing system, while utilizing the existing wiring regardless of existing resistance values. A system built in this way, either as an original installation or as a retrofit, provides a flexible and relatively inexpensive option which eliminates dependency on proprietary hardware and software.

*Id.*, 8:27-34. Thus, the ‘683 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

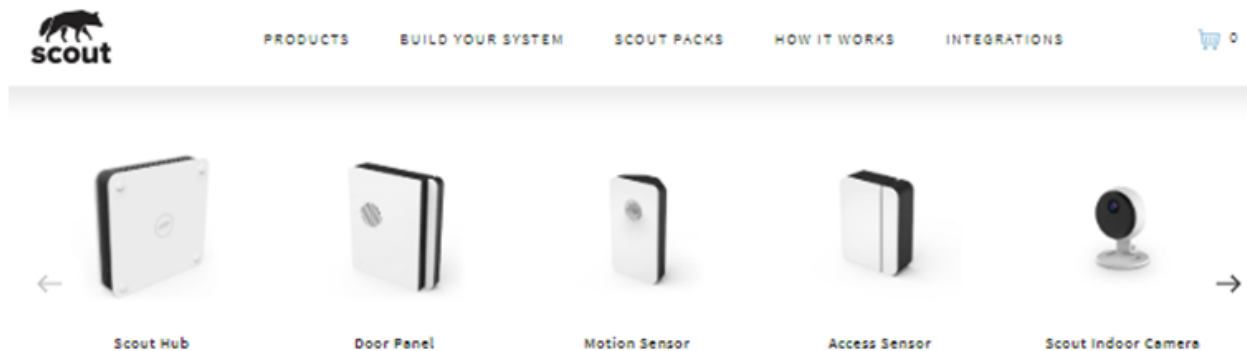
16. Collectively, the claimed embodiments in the ‘683 Patent provide new solutions to problems of traditional security monitoring systems. These solutions are enabled by non-generic components functioning in a non-conventional manner.

17. The ‘683 Patent solves a problem with the art that is rooted in computer technology. The ‘683 Patent does not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.

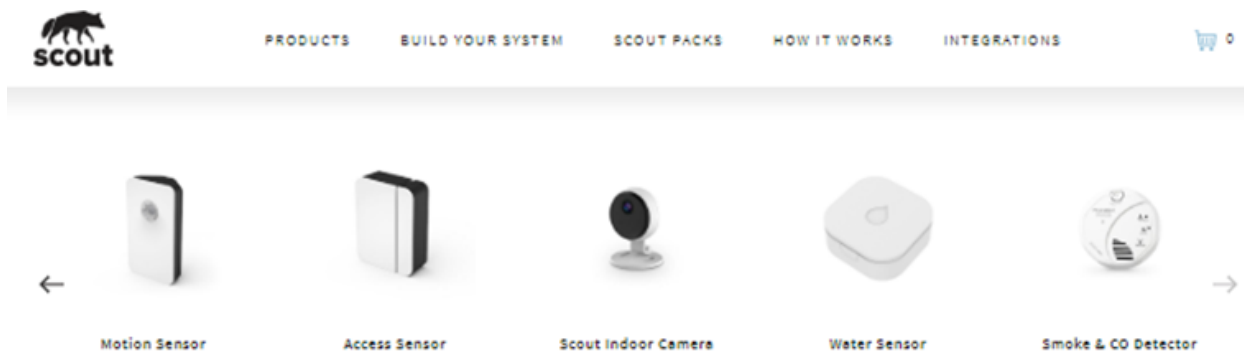
18. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 8 of the ‘683 Patent by making, using, importing,

selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems, which are covered by one or more claims of the ‘683 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed and continues to infringe the ‘683 Patent directly in violation of 35 U.S.C. § 271.

19. Regarding Claim 8, Defendant makes, uses, sells and/or offers for sale an apparatus for monitoring the status of a measurable parameter of an electrical circuit. For example, Defendant provides Wifi Home & Apartment Security Systems such as Scout Hub, Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock (“Apparatus”) for monitoring the measurable parameter (such as inductance, resistance and/or capacitance) of an electric circuit associated with the sensor. Infringing products and certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



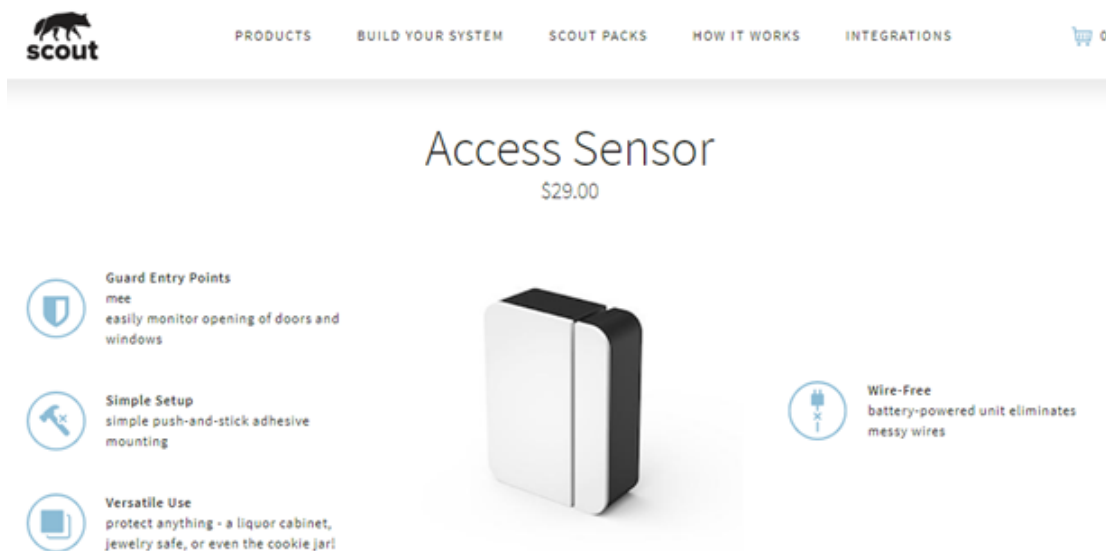
Source: <https://www.scoutalarm.com/>



Source: <https://www.scoutalarm.com/>



Source: <https://www.scoutalarm.com/pages/how-it-works>



Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>



**Protect anything you want**

The access sensor detects when the sensor bar and the detector move apart. Keep an eye on anything you want to keep off-limits that opens and closes, like your fridge or liquor cabinet.

Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>

## Scout Hub

\$129

The brains of the system. Plugs into your router and talks wirelessly to the sensors.

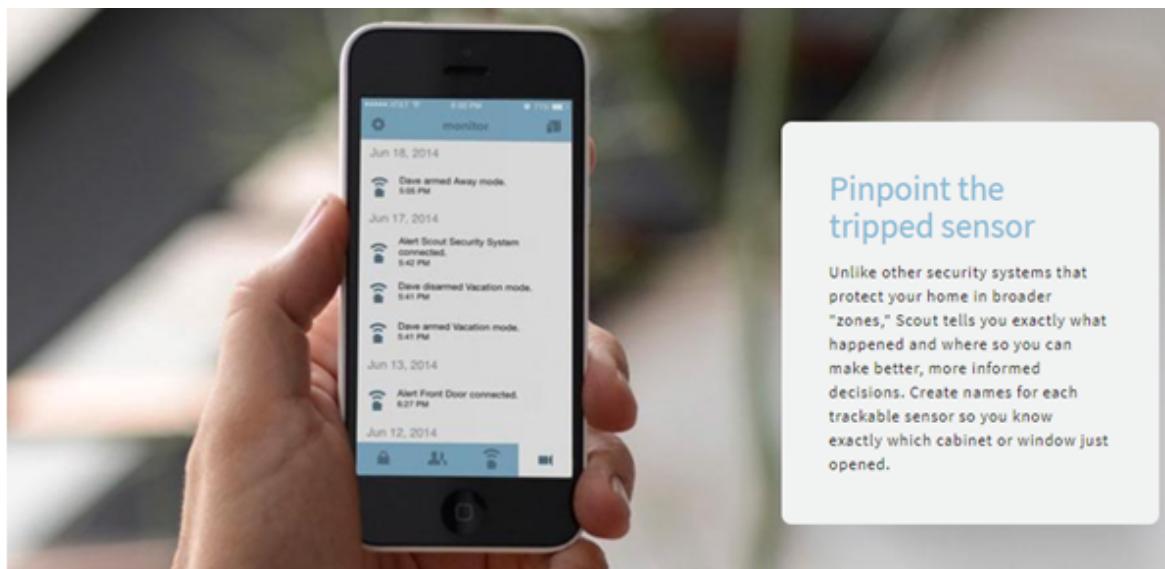
### SYSTEM FEATURES

- › Month-to month, no long-term contracts
- › Simple, do-it-yourself installation
- › 4G cellular backup and battery backup included
- › Smart home integrations included
- › Self-monitor or add 24/7 police dispatch

*The Hub is equipped with 4G Cellular and battery backups, so you never lose security. A 105 dB siren deters intruders, and the ZigBee and Z-wave radios connect you to the best in class integrations.*



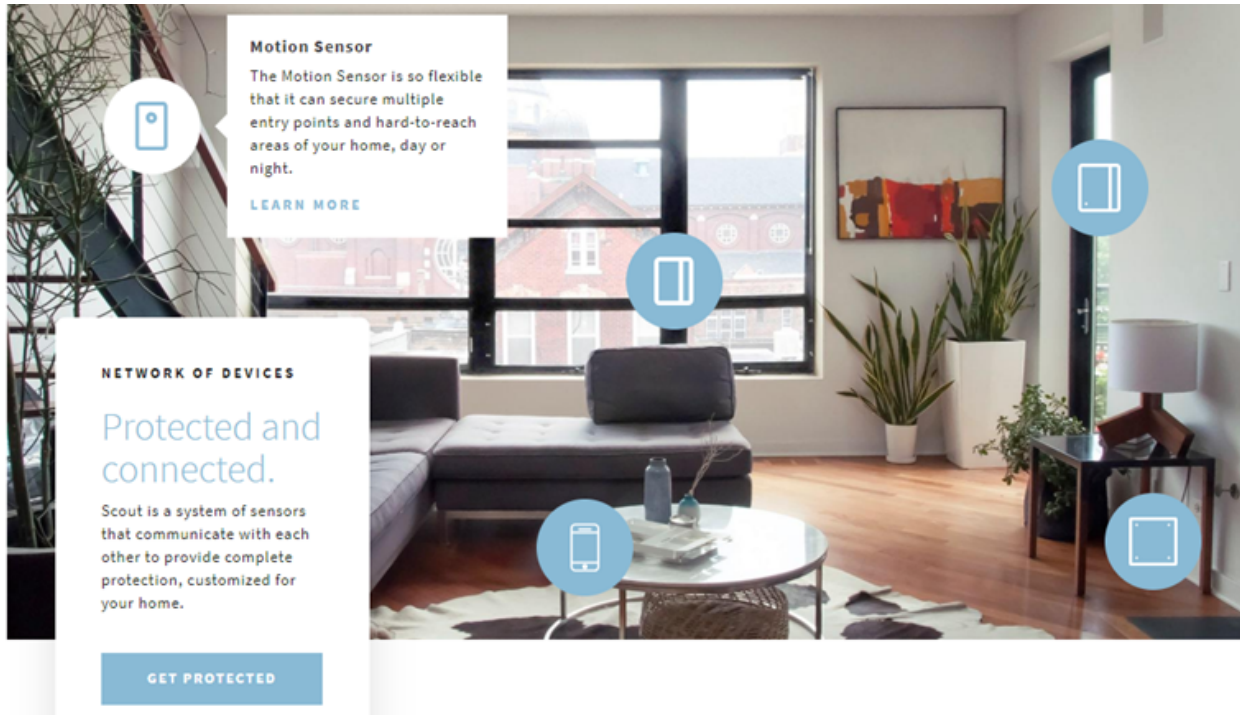
Source: <https://www.scoutalarm.com/pages/build-your-system>



Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>

20. The infringing products provide a measurement means for measuring the magnitude of said parameter and generating an analog signal representative of said magnitude. For example, the Scout Security Wifi Home & Apartment Security System integrates with one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) to measure the magnitude of the parameter of the circuit and generates an analog signal (such as voltage and/or current) representative of the measured parameter associated with the sensor. Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.





Source: <https://www.scoutalarm.com/>

## Scout Packs

**MOST POPULAR**

**Scout Small Pack** **\$299.00**

The perfect introduction to Scout's DIY Home Security Products. Affordable security products for any sized home.

- Hub - 1x
- Door Panel - 1x
- Motion - 1x
- Access - 2x
- Key Fobs - 2x
- Yard Sign - 1x

Arctic  Midnight [ADD TO CART](#)

**Scout Large Pack** **\$449.00**

For larger homes and areas, the Large Pack offers a reliable, cost effective solution. These DIY Security Products strengthen your ability to monitor your home from anywhere via the Scout Mobile app.

- Hub - 1x
- Door Panel - 1x
- Motion - 2x
- Access - 5x
- Key Fobs - 2x
- Yard Sign - 1x

Arctic  Midnight [ADD TO CART](#)

Source: <https://www.scoutalarm.com/collections/scout-packs>

**Scout Elements Pack** **\$599.00**

Scout's Elements kit protects against costly, yet common, in-home disasters such as fire & flood. Coupled with our Always On+ plan, peace of mind comes standard; local fire & police are standing by.

- » Hub - 1x
- » Door Panel - 1x
- » Motion - 1x
- » Access - 4x
- » Key Fobs - 2x
- » Yard Sign - 1x
- » Smoke/CO - 1x
- » Water Sensor - 1x

Arctic  Midnight **ADD TO CART**

**Scout Architect Pack** **\$799.00**

Designed for houses with multiple access points. The Yale Smart lock makes it easier to secure your home from anywhere, and the Glass Break sensor ensures intruders trying to gain access through windows or patio doors are thwarted.

- » Hub - 1x
- » Door Panel - 1x
- » Motion - 1x
- » Access - 4x
- » Key Fobs - 2x
- » Yard Sign - 1x
- » Smart Lock - 1x
- » Glass Break - 1x

Arctic  Midnight **ADD TO CART**

Source: <https://www.scoutalarm.com/collections/scout-packs>

**Brains and beauty**

The Hub does so much more than just look sleek. It connects directly to your sensors across your home, capturing and analyzing information from all of your Scout devices. This is how the Hub knows when and how to alert you.

Source: <https://www.scoutalarm.com/products/scout-hub?variant=12783050489898>

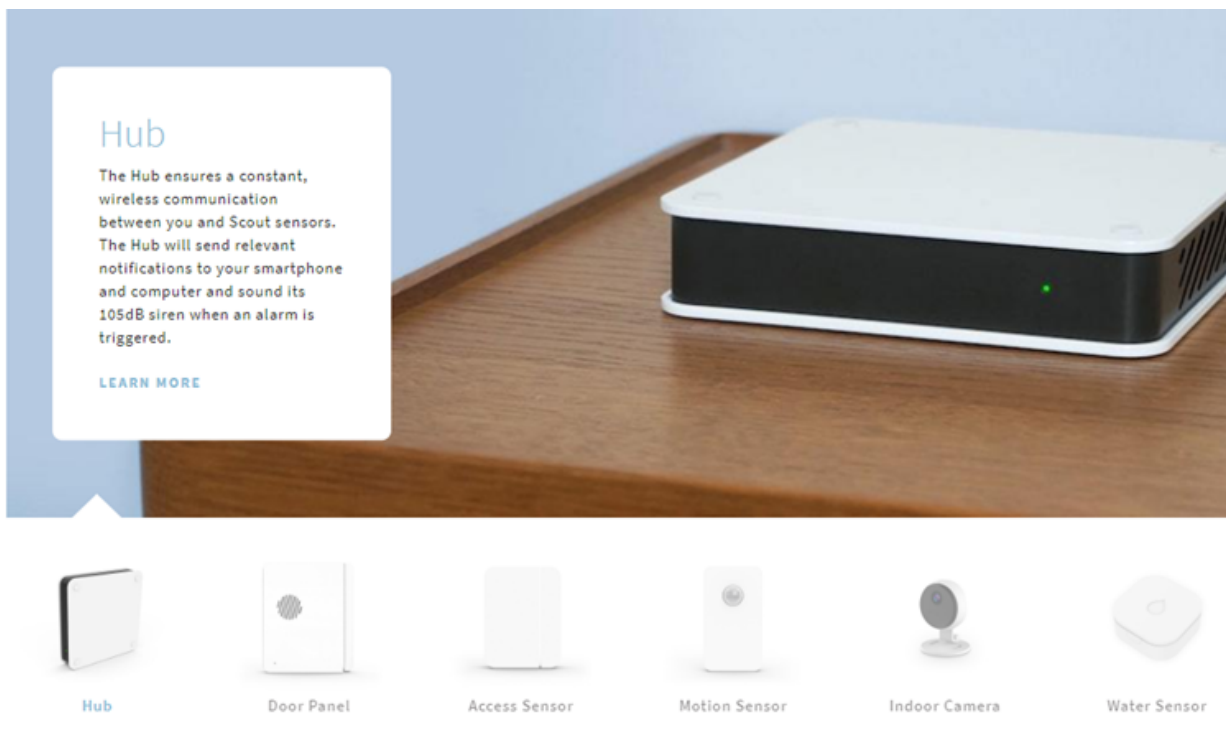
**Motion Sensor**

The Motion Sensor can detect movement up to 25 feet away, day or night. Its unique shape and 90 degree field of view allow for placement on walls, in corners, standing on a shelf and more.

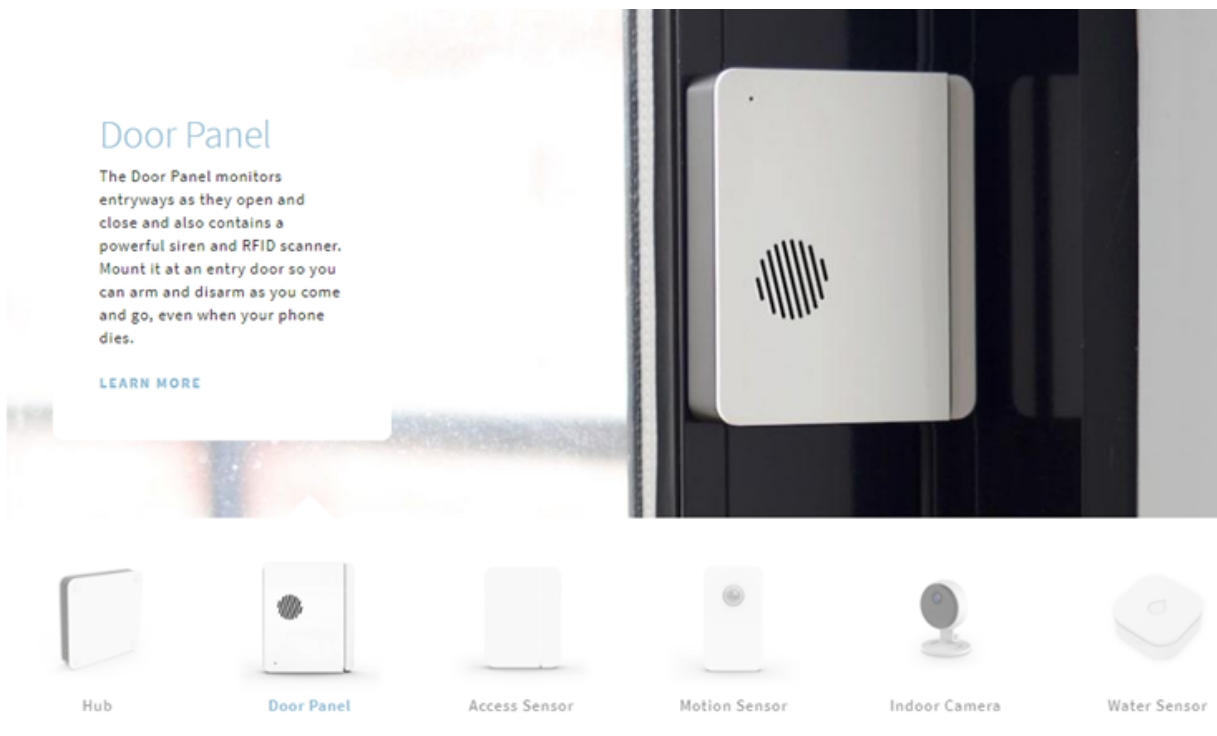
[LEARN MORE](#)

Source: <https://www.scoutalarm.com/pages/how-it-works>

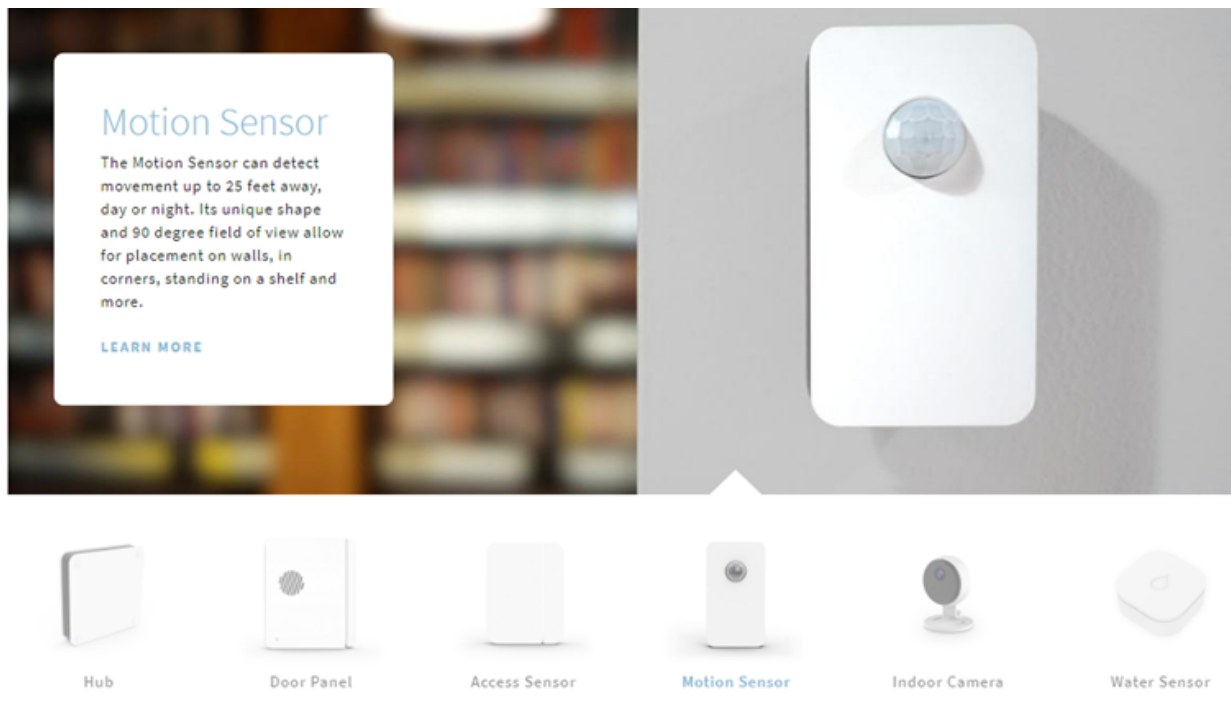
21. The infringing products provide an analog to digital conversion means for generating from said analog signal a count value representative of said magnitude. For example, the Scout Security Wifi Home & Apartment Security system provides an analog to digital converter to generate a count value associated with the analog signal (such as voltage and/or current) representative of the measured parameter of the sensor. Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



Source: <https://www.scoutalarm.com/pages/how-it-works>



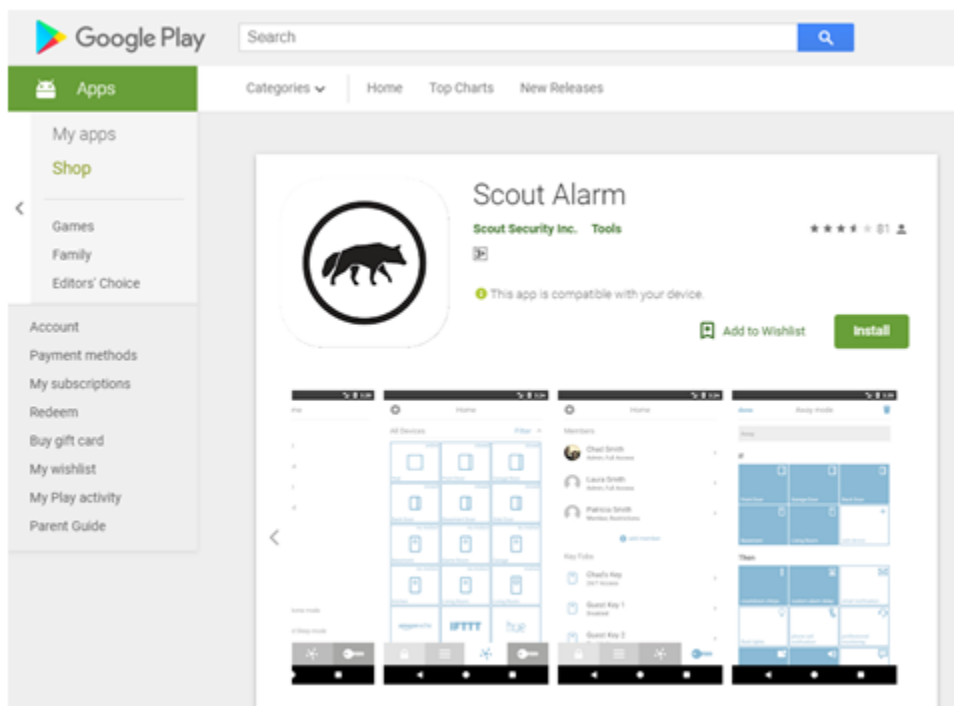
Source: <https://www.scoutalarm.com/pages/how-it-works>



Source: <https://www.scoutalarm.com/pages/how-it-works>

22. The infringing products provide a comparison means for comparing said count value with a threshold value and generating from the comparison a status signal, said status

signal having two possible values which thereby indicates whether the count value is greater than or less than said threshold value. For example, the Scout Security Wifi Home & Apartment Security System integrates Scout Hub and at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) via a wireless communication network and compares the count value with a threshold value and generates a status signal (such as alert, notification and/or alarm). The status signal have at least two possible values (high or low) which is greater or less than the threshold value. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: <https://play.google.com/store/apps/details?id=com.scoutalarm.android&hl=en>

## App Store Preview

This app is only available on the App Store for iOS devices.



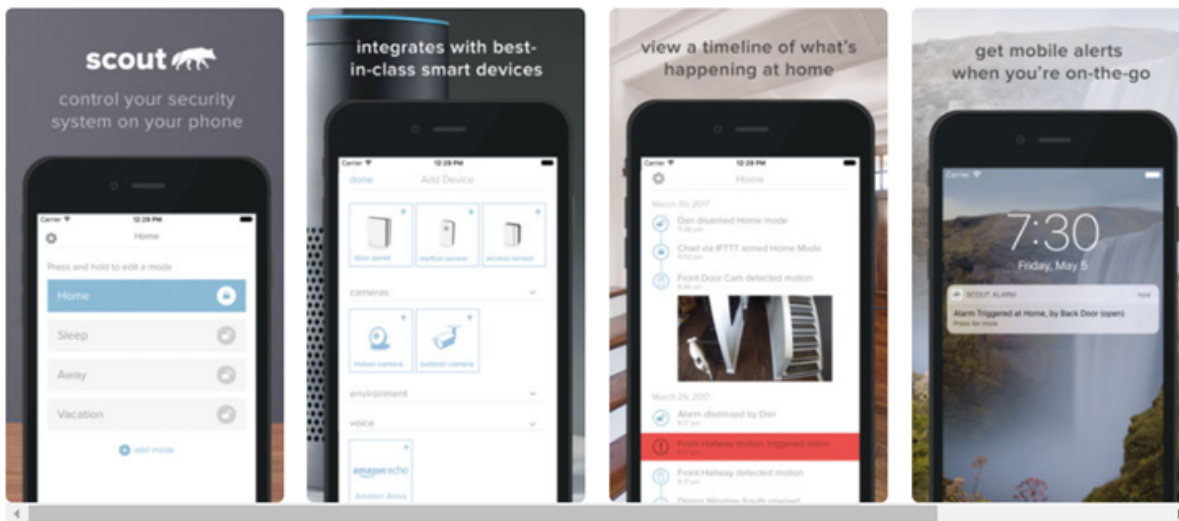
### Scout Alarm - Home Security 4+

A New Breed of Home Security

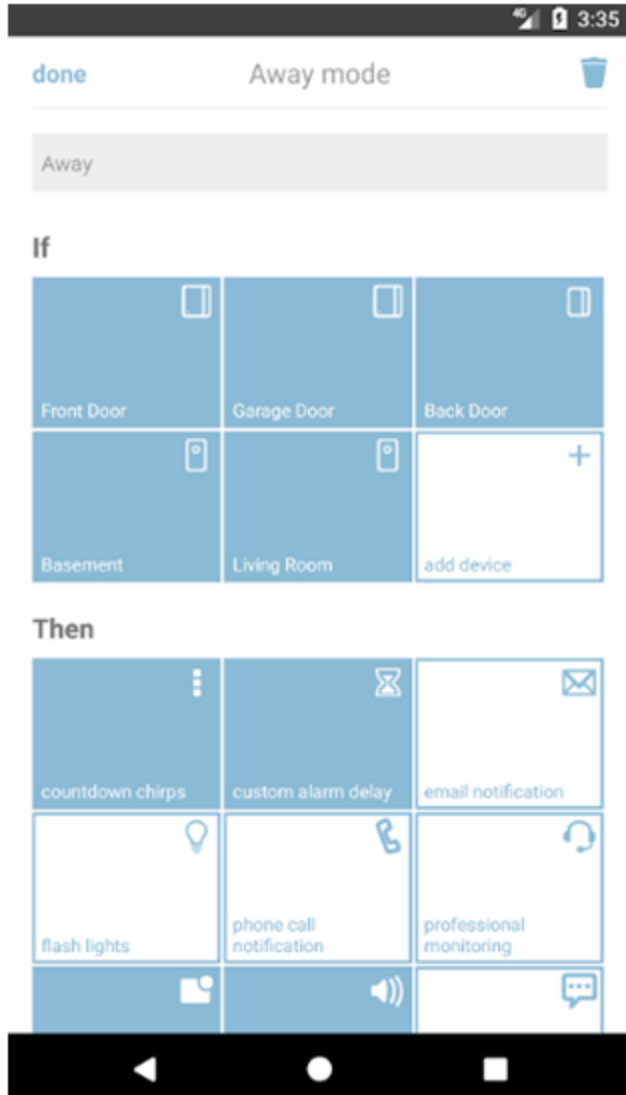
Scout Alarm

Free

### Screenshots [iPhone](#) [iPad](#) [Apple Watch](#)



Source: <https://itunes.apple.com/us/app/scout-alarm-home-security/id865289702?mt=8>



Source: <https://play.google.com/store/apps/details?id=com.scoutalarm.android&hl=en>

## Motion Sensor

\$49.00



**Works at Night**  
infrared sensor detects motion regardless of available light



**Simple Setup**  
easy flat or push-and-stick mounting in seconds



**Wire-Free**  
detect intruders that enter without opening a door or window



**Full-Range Coverage**  
field of view of 90 degrees gives you a wide picture



**Flexible Placement**  
put it on a wall, in a corner, on a shelf, or anywhere you want

Source: <https://www.scoutalarm.com/collections/home-featured/products/motion-sensor?variant=12783049736234>

# Door Lock

\$229.00



**Ditch your Keys**  
keyless, digital touchpad and pin codes replace the need for keys



**Syncs with Scout Modes**  
sync locking and unlocking with arming and disarming of security modes



**Battery-Powered**  
runs on batteries and features fail-safe 9v charging pins



**Control from Anywhere**  
lock and unlock your door remotely



**Tamper-Resistant**  
built-in security features so that pincodes cannot be deciphered

Source: <https://www.scoutalarm.com/collections/added-protection/products/door-lock?variant=12783048818730>

Your anytime, anywhere connection to your home.

**Check in from any smart device:**

- ▶ activity feed records all sensor activity
- ▶ view the entire system or a single sensor

**Set custom actions and alerts:**

- ▶ tell Scout how to react in different situations
- ▶ set location and context-based modes
- ▶ auto-alert a trusted network if you're out of reach



**Arm and disarm from anywhere:**

- ▶ remotely grant temporary access to your home
- ▶ arm Scout or change modes from your phone

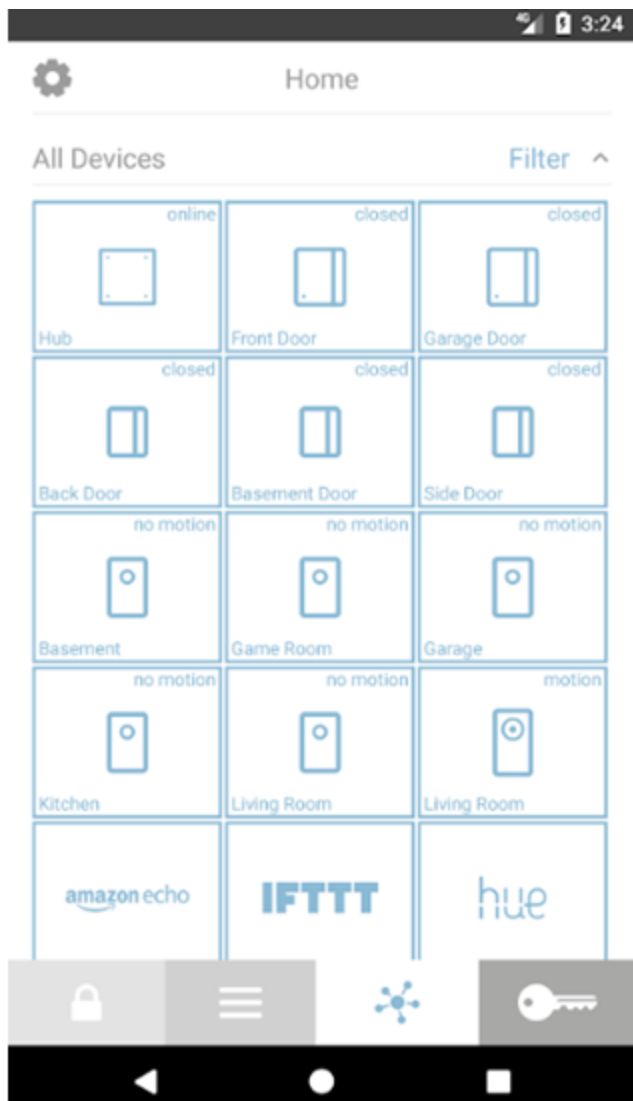
**Pull the plug on false alarms**

- ▶ know exact sensor that tripped in seconds
- ▶ quickly decide if you need the police or not

<https://www.scoutalarm.com/pages/how-it-works>

Source:





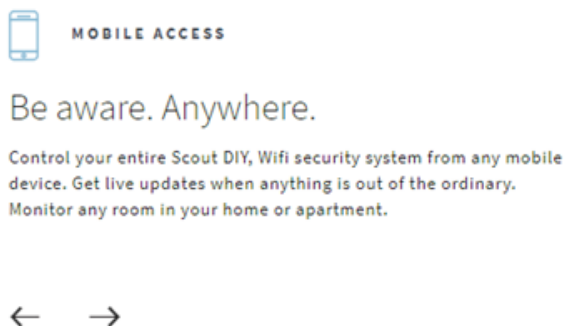
Source: <https://play.google.com/store/apps/details?id=com.scoutalarm.android&hl=en>

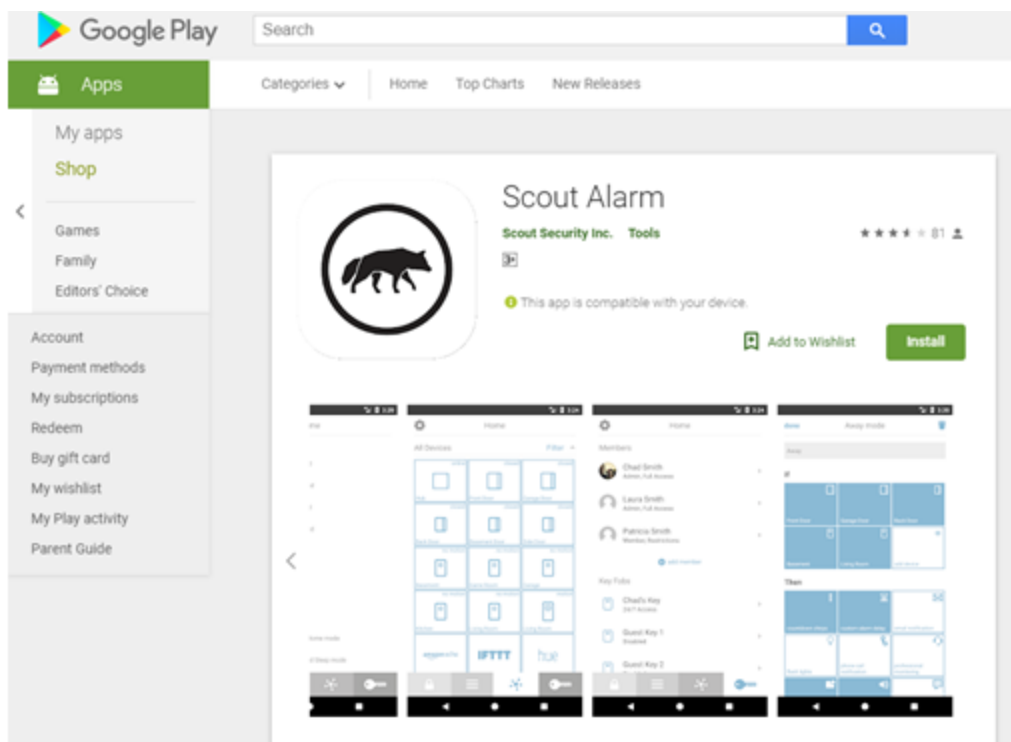
23. The infringing products provide a transmission means for transmitting said status signal via a communications network to a display. For example, the Scout Security Wifi Home & Apartment Security System provide a communication module (“transmission means”) for at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) via a wireless network (such as Wi-Fi, ZigBee, Z-Wave and/or 4G LTE) to a Scout Hub and/or mobile computing device (“display”). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

24. The infringing products provide a display means for displaying an indication of said assigned status. For example, the Scout Security Wifi Home & Apartment Security System provides a mobile application (“Scout Alarm”) to display an indication (such as alarm, notification and/or alerts) of at least one of the coupled sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) based on the signal assigned status on a computing device (such as smartphone, tablet and/or computer). Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

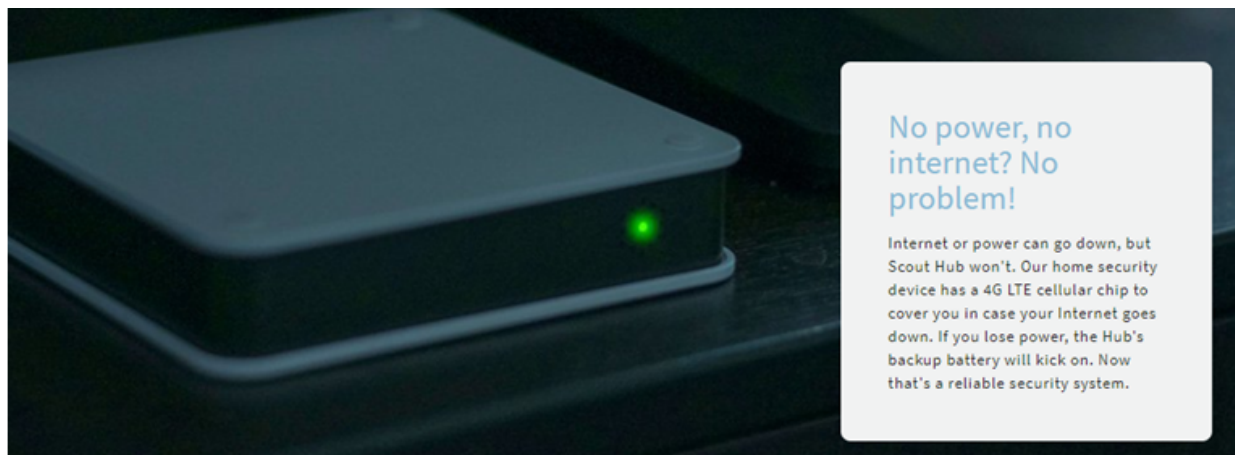


Source: <https://www.scoutalarm.com/>





Source: <https://play.google.com/store/apps/details?id=com.scoutalarm.android&hl=en>



Source: <https://www.scoutalarm.com/products/scout-hub?variant=12783050489898>



Source: <https://www.scoutalarm.com/pages/how-it-works>



Source: <https://www.scoutalarm.com/pages/how-it-works>

### What happens if an alarm goes off?



**1. Sensor is Tripped**

A sensor detects unexpected activity and immediately notifies your Scout Hub.



**2. Your Plan in Motion**

The Hub triggers your preset responses such as a siren or custom alerts.



**3. Respond or Ignore**

View details of the event and quickly decide if you need to alert authorities or not.



Source: <https://www.scoutalarm.com/pages/how-it-works>

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

26. 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.

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

**COUNT II**  
**(INFRINGEMENT OF UNITED STATES PATENT NO. 7,834,744)**

28. Plaintiff incorporates paragraphs 1 through 27 herein by reference.

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

30. Plaintiff is the owner by assignment of the '744 Patent with sole rights to enforce the '744 Patent and sue infringers.

31. A copy of the '744 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit B.

32. The '744 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

33. The claims of the '744 recite subject matter that is similar to that recited in the claims of the '683 Patent (discussed above in connection with Count I). The specification of the '744 Patent discloses problems of prior systems and non-generic solutions in a manner similar to the specification of the '683 Patent (discussed above in connection with Count I).

35. The components recited in the claims (such as in claim 1 for example) are configured, such that they operate in a non-conventional manner.

36. The components recited in the claims (such as in claim 1 for example) are

configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit). Generic processors cannot provide this functionality. The '744 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

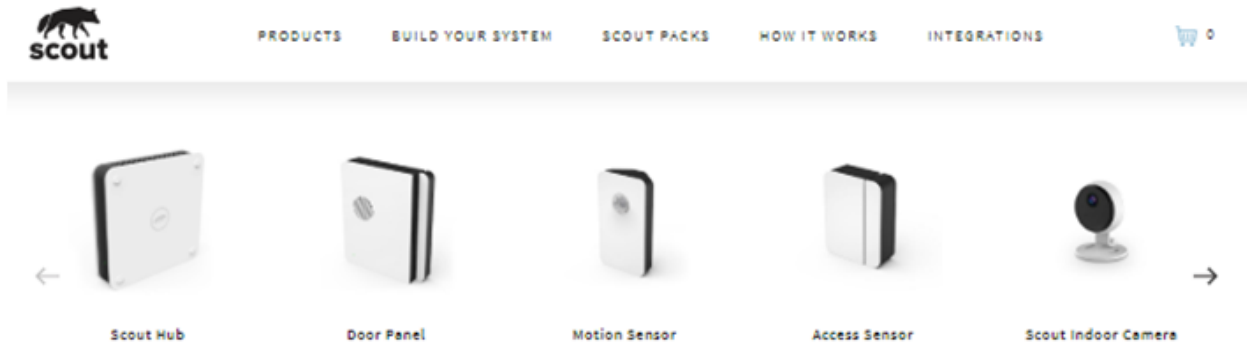
37. Collectively, the claimed embodiments in the '744 Patent provide new solutions to problems of traditional security monitoring systems. These solutions are enabled by non-generic components functioning in a non-conventional manner.

38. The '744 Patent solves a problem with the art that is rooted in computer technology. The '744 Patent does not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.

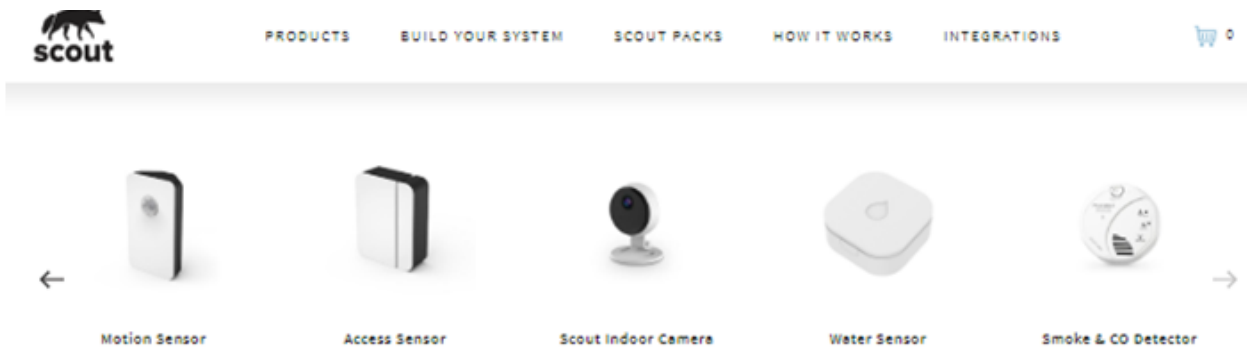
39. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '744 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems covered by one or more claims of the '744 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed and continues to infringe the '744 Patent directly in violation of 35 U.S.C. § 271.

40. Regarding Claim 1, Defendant makes, uses, sells and/or offers for sale an apparatus for monitoring a circuit and for coupling to a central system. For example, Defendant provides the Wifi Home & Apartment Security Systems including Scout Hub for monitoring at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock). Scout Security Scout Hub ("central system") couples to the sensor using wireless network (such as Wi-

Fi, ZigBee, Z-Wave and/or 4G LTE). Infringing products and certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



Source: <https://www.scoutalarm.com/>



Source: <https://www.scoutalarm.com/>

## Scout Hub

\$129

The brains of the system. Plugs into your router and talks wirelessly to the sensors.

### SYSTEM FEATURES

- › Month-to-month, no long-term contracts
- › Simple, do-it-yourself installation
- › 4G cellular backup and battery backup included
- › Smart home integrations included
- › Self-monitor or add 24/7 police dispatch

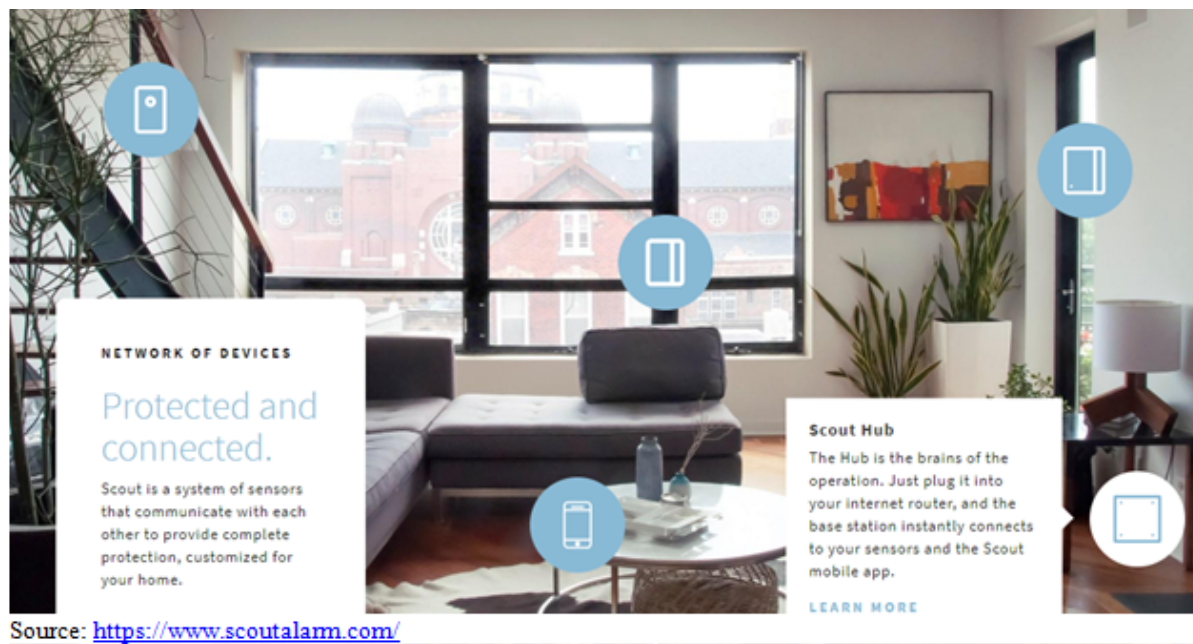
*The Hub is equipped with 4G Cellular and battery backups, so you never lose security. A 105 dB siren deters intruders, and the ZigBee and Z-wave radios connect you to the best in class integrations.*



Arctic

SELECT + CHOOSE SENSORS

Source: <https://www.scoutalarm.com/pages/build-your-system>

A photograph of a modern living room with a large window overlooking a city. The room contains a grey sofa, a coffee table, and a lamp. Several Scout Hub and sensor icons are overlaid on the image. A text box on the left describes the network of devices, and a text box on the right describes the Scout Hub.

**NETWORK OF DEVICES**

Protected and connected.

Scout is a system of sensors that communicate with each other to provide complete protection, customized for your home.

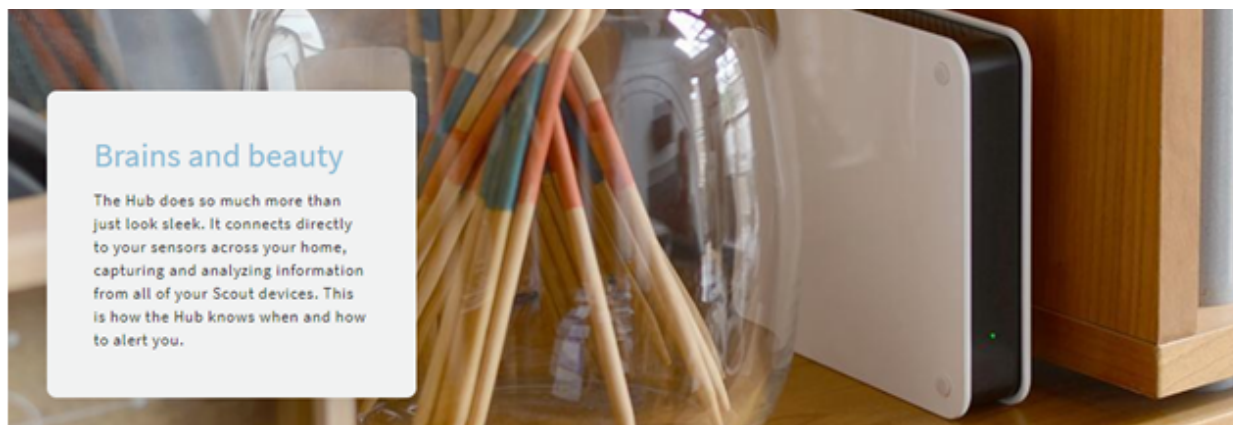
**Scout Hub**

The Hub is the brains of the operation. Just plug it into your internet router, and the base station instantly connects to your sensors and the Scout mobile app.

LEARN MORE

Source: <https://www.scoutalarm.com/>





Source: <https://www.scoutalarm.com/products/scout-hub?variant=12783050489898>

## Scout Hub

\$129.00



**Versatile Design**  
stands on its side or vertically on your desktops and shelves



**4G LTE Cellular Backup**  
keeps your system running even when the internet's down



**105DB Alarm**  
triggers siren loud enough to scare burglars



**Easy Connection**  
plug into modem or router via an ethernet cord



**Battery Backup**  
keeps your system running even when the power is out



**Pair Multiple Sensors**  
easily expand your system with simply one hub

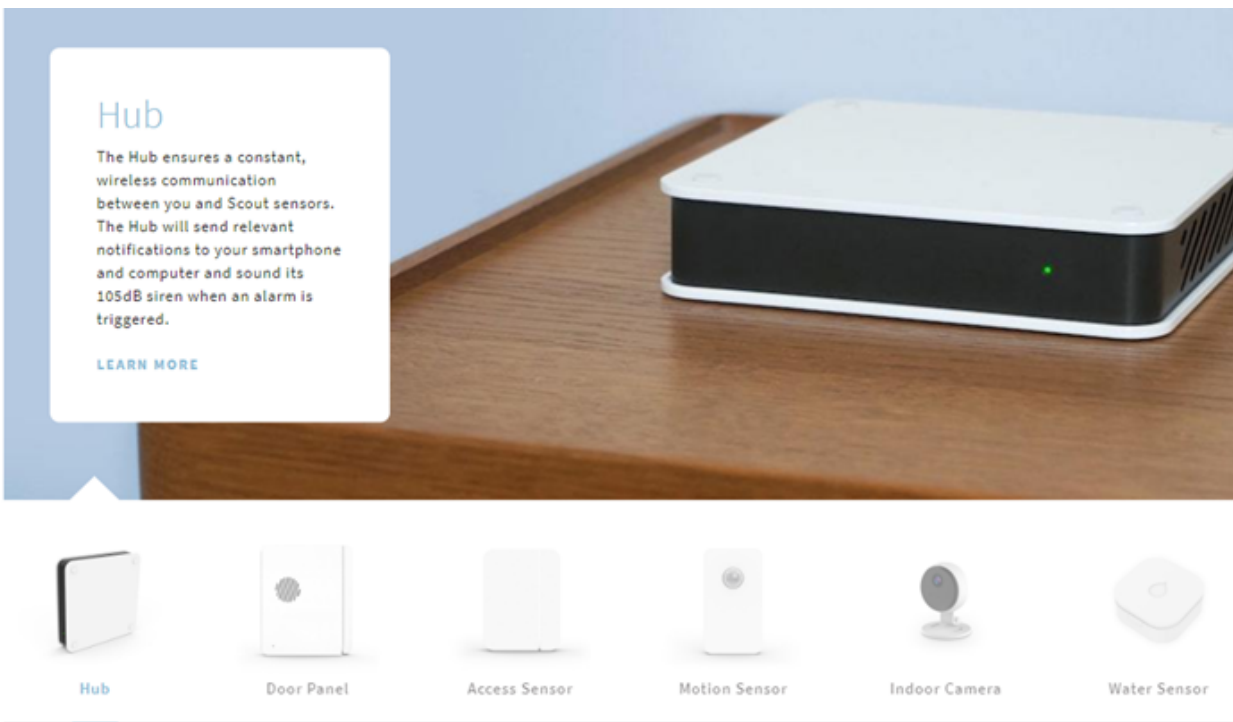
Source: <https://www.scoutalarm.com/products/scout-hub?variant=12783050489898>

## Meet Our Scout Hub



Source: [Source: https://www.scoutalarm.com/products/scout-hub?variant=12783050489898](https://www.scoutalarm.com/products/scout-hub?variant=12783050489898)

41. The infringing products provide a circuit module to determine a status of the circuit. For example, the Scout Security System Wifi Home & Apartment Security System integrates with at least one of the sensors (“circuit module”) (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) to determine a status (such as motion, smoke and/or leakage of carbon monoxide) of the sensor. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: <https://www.scoutalarm.com/pages/how-it-works>

## Access Sensor

\$29.00



**Guard Entry Points**  
easily monitor opening of doors and windows



**Simple Setup**  
simple push-and-stick adhesive mounting

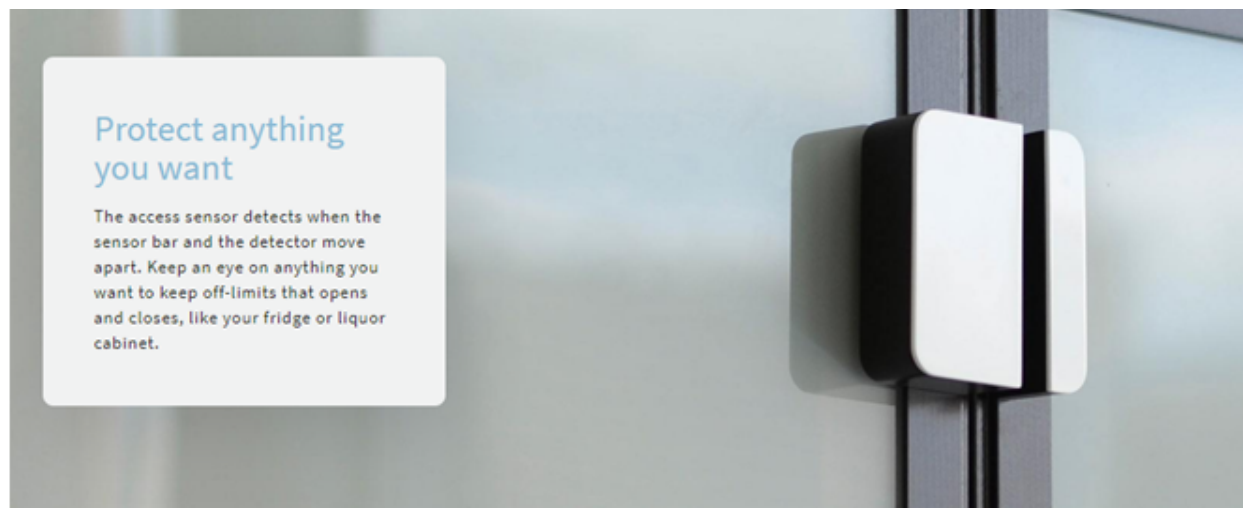


**Versatile Use**  
protect anything - a liquor cabinet, jewelry safe, or even the cookie jar!



**Wire-Free**  
battery-powered unit eliminates messy wires

Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>



Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>

## Motion Sensor

\$49.00



**Works at Night**  
Infrared sensor detects motion regardless of available light



**Simple Setup**  
easy flat or push-and-stick mounting in seconds



**Wire-Free**  
detect intruders that enter without opening a door or window

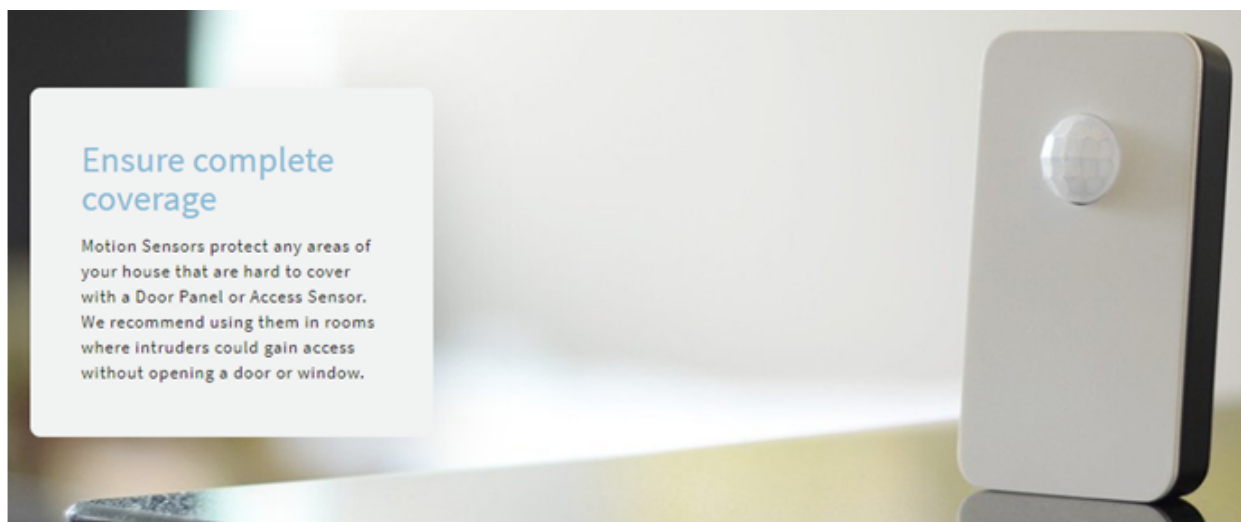


**Full-Range Coverage**  
field of view of 90 degrees gives you a wide picture



**Flexible Placement**  
put it on a wall, in a corner, on a shelf, or anywhere you want

Source: <https://www.scoutalarm.com/collections/home-featured/products/motion-sensor?variant=12783049736234>



Source: <https://www.scoutalarm.com/collections/home-featured/products/motion-sensor?variant=12783049736234>



Source: <https://www.scoutalarm.com/collections/added-protection/products/door-lock?variant=12783048818730>

## Door Lock

\$229.00



### Ditch your Keys

keyless, digital touchpad and pin codes replace the need for keys



### Syncs with Scout Modes

sync locking and unlocking with arming and disarming of security modes



### Battery-Powered

runs on batteries and features fail-safe 9v charging pins



### Control from Anywhere

lock and unlock your door remotely



### Tamper-Resistant

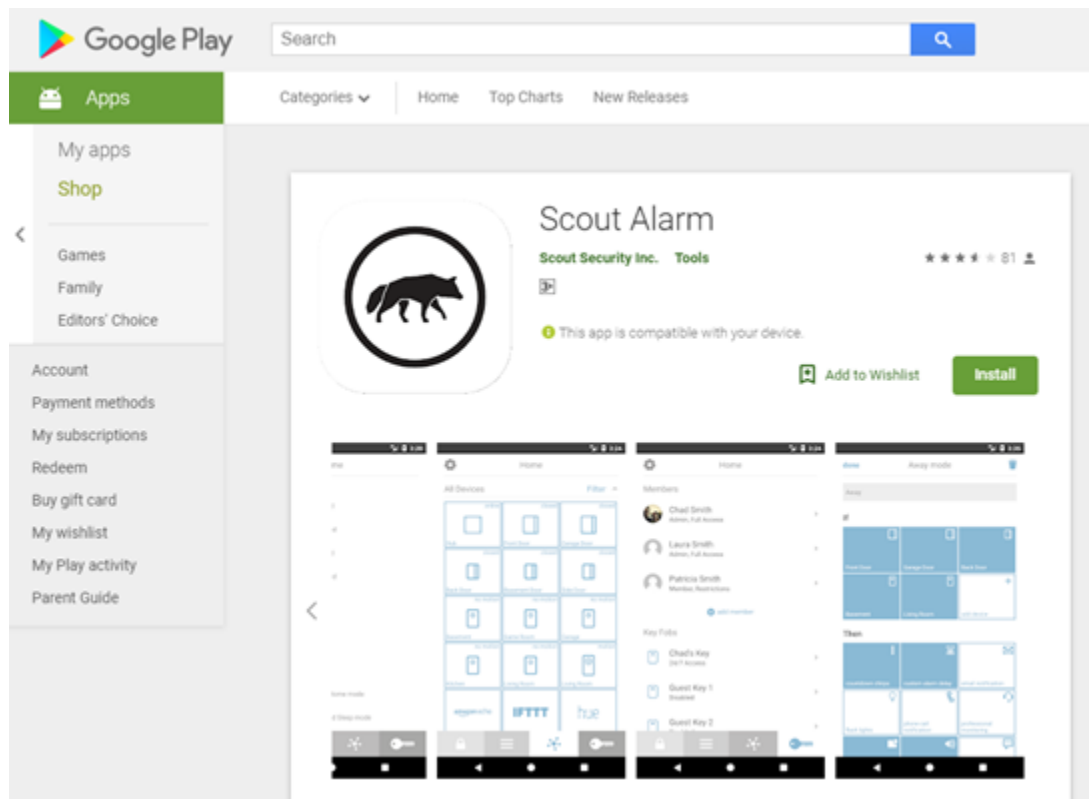
built-in security features so that pincodes cannot be deciphered

Source: <https://www.scoutalarm.com/collections/added-protection/products/door-lock?variant=12783048818730>

42. The infringing products provide a network communications module coupled to the circuit module to communicate a signal indicative of the assigned status to the central system via a network, said network communications module limiting all status communications with the central system to only the signal indicative of the assigned status. For example, the Scout Security Wifi Home & Apartment Security Systems comprises a network communication module coupled with at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) to communicate a signal indicative of the assigned status (such as motion, access, smoke and/or carbon monoxide) to the Scout Hub (“central system”) via a wireless network (such as Wi-Fi, ZigBee, Z-Wave and/or 4G LTE). The communication module is dedicated to communicate with the central system to indicate the status of the signal from at least one of the sensor. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

43. The infringing products provide a display to present an indication of a status of the circuit based on the signal indicative of the assigned status, wherein the circuit module measures a magnitude of a parameter of the circuit and generates a count value representative of said magnitude. For example, the Scout Security provides a Wifi Home & Apartment Security System including a mobile application “Scout Alarm App” for mobile, tablet and/or computer (“a display”) to present an indication (such as alarm, notification and/or alerts) of at least one of the coupled sensors based on the signal indicative of the assigned status (such as motion, access, smoke and/or carbon monoxide). The sensor measures a magnitude of a parameter (such as resistance, voltage and/or current) and generates a count value representative of at least one of the magnitude. Certain aspects of this element are illustrated in the screenshots below and/or

those provided in connection with other allegations herein.



App Store Preview

This app is only available on the App Store for iOS devices.



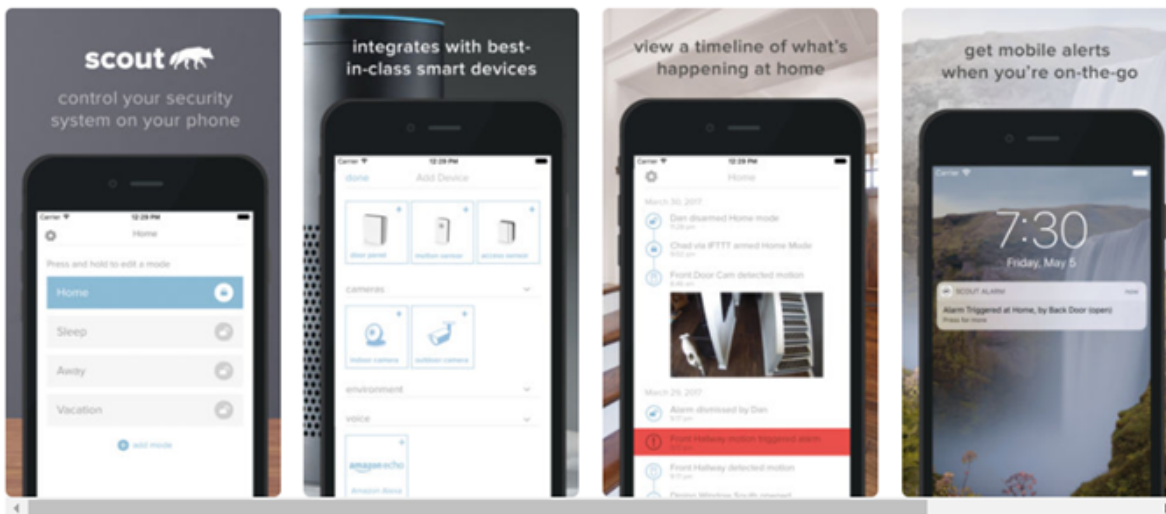
**Scout Alarm - Home Security** (4+)

A New Breed of Home Security

Scout Alarm

Free

Screenshots iPhone iPad Apple Watch



Source: <https://itunes.apple.com/us/app/scout-alarm-home-security/id865289702?mt=8>

44. Defendant’s actions complained of herein will continue unless Defendant is enjoined by this court.

45. 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.

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

**COUNT III**  
**(INFRINGEMENT OF UNITED STATES PATENT NO. 8,816,869)**

47. Plaintiff incorporates paragraphs 1 through 46 herein by reference.

48. This cause of action arises under the patent laws of the United States and, in

particular, under 35 U.S.C. §§ 271, et seq.

49. Plaintiff is the owner by assignment of the '869 Patent with sole rights to enforce the '869 Patent and sue infringers.

50. A copy of the '869 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit C.

51. The '869 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

52. The claims of the '869 recite subject matter that is similar to that recited in the claims of the '683 Patent (discussed above in connection with Count I). The specification of the '869 Patent discloses problems of prior systems and non-generic solutions in a manner similar to the specification of the '683 Patent (discussed above in connection with Count I).

53. The components recited in the claims (such as in claim 1 for example) are configured, such that they operate in a non-conventional manner.

54. The components recited in the claims (such as in claim 1 for example) are configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit). Generic processors cannot provide this functionality. The '869 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

55. Collectively, the claimed embodiments in the '869 Patent provide new solutions to problems of traditional security monitoring systems. These solutions are enabled by non-generic components functioning in a non-conventional manner.

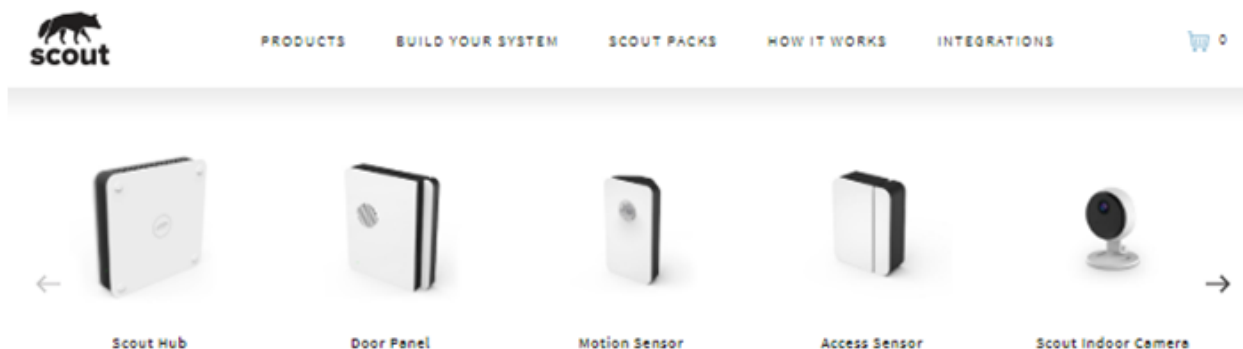
56. The '869 Patent solves a problem with the art that is rooted in computer technology. The '869 Patent does not merely recite the performance of some business practice



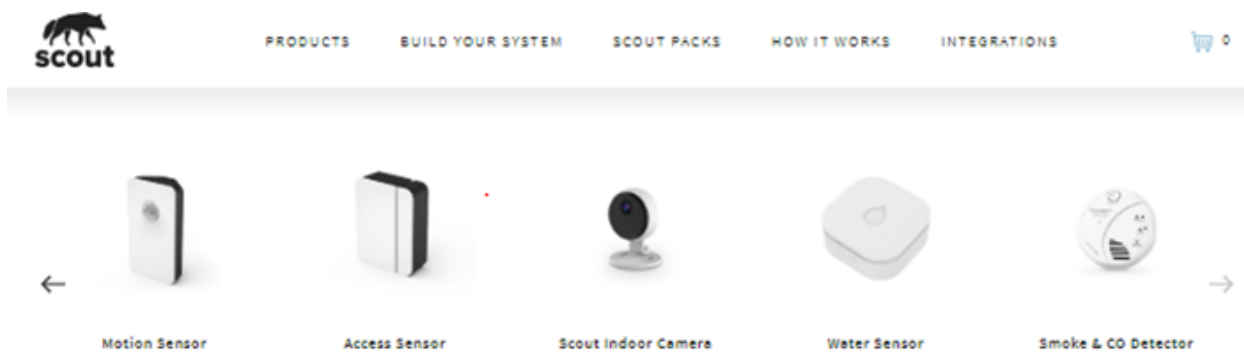
known from the pre-Internet world along with the requirement to perform it on the Internet.

57. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the ‘869 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems covered by one or more claims of the ‘869 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed and continues to infringe the ‘869 Patent directly in violation of 35 U.S.C. § 271.

58. Regarding Claim 1, Defendant makes, uses, sells and/or offers for sale a device for monitoring the status of a circuit based on a measurable parameter of the circuit. For example, Defendant provides Wifi Home & Apartment Security Systems including Scout Hub, Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock (“device”) for monitoring the measurable parameter (such as inductance, resistance and/or capacitance) of the circuit associated with the sensor. Infringing products and certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



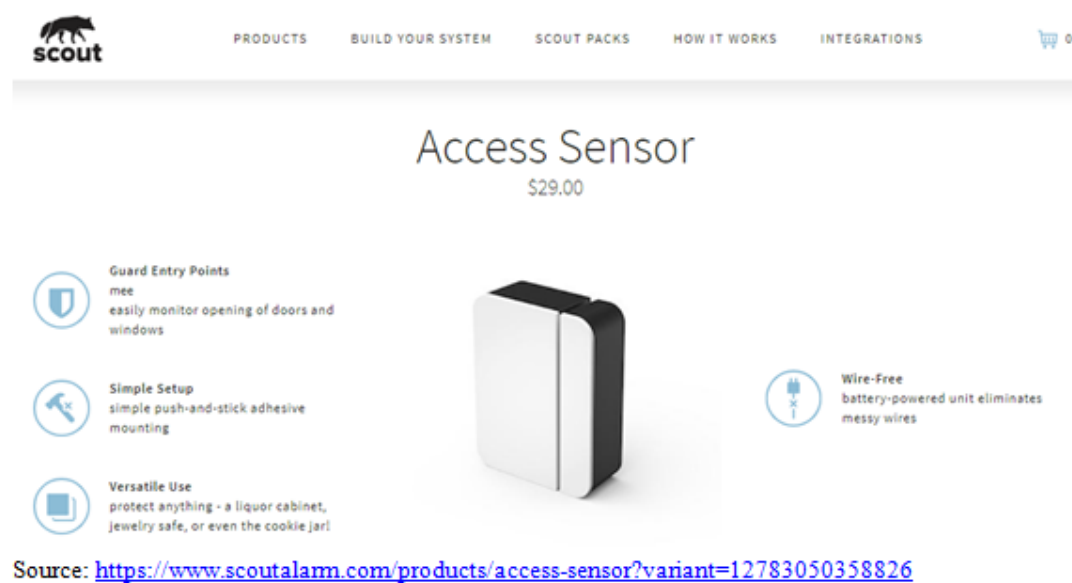
Source: <https://www.scoutalarm.com/>



Source: <https://www.scoutalarm.com/>



Source: <https://www.scoutalarm.com/pages/how-it-works>





Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>

## Scout Hub

\$129

The brains of the system. Plugs into your router and talks wirelessly to the sensors.

### SYSTEM FEATURES

- › Month-to-month, no long-term contracts
- › Simple, do-it-yourself installation
- › 4G cellular backup and battery backup included
- › Smart home integrations included
- › Self-monitor or add 24/7 police dispatch

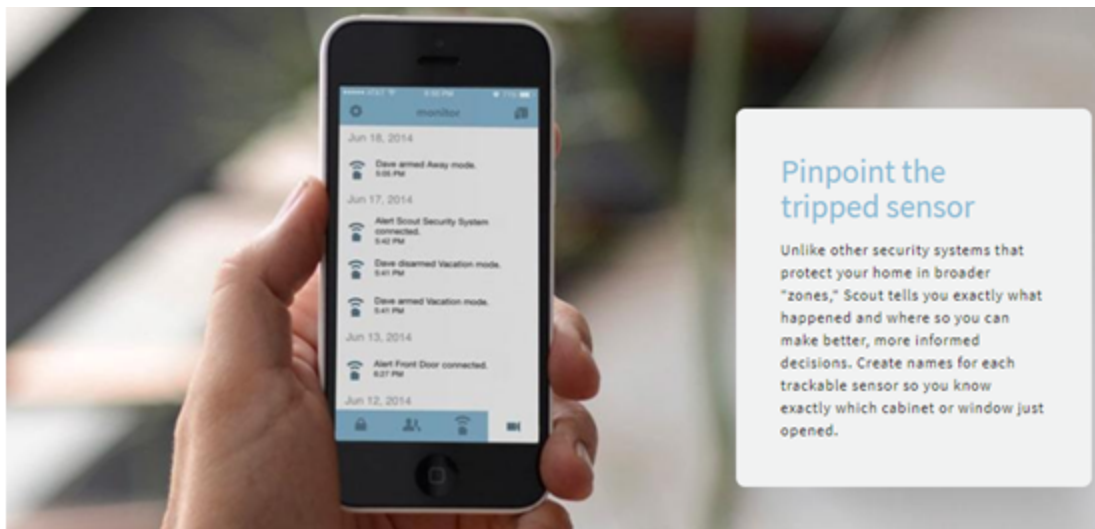
*The Hub is equipped with 4G Cellular and battery backups, so you never lose security. A 105 dB siren deters intruders, and the ZigBee and Z-wave radios connect you to the best in class integrations.*



Arctic

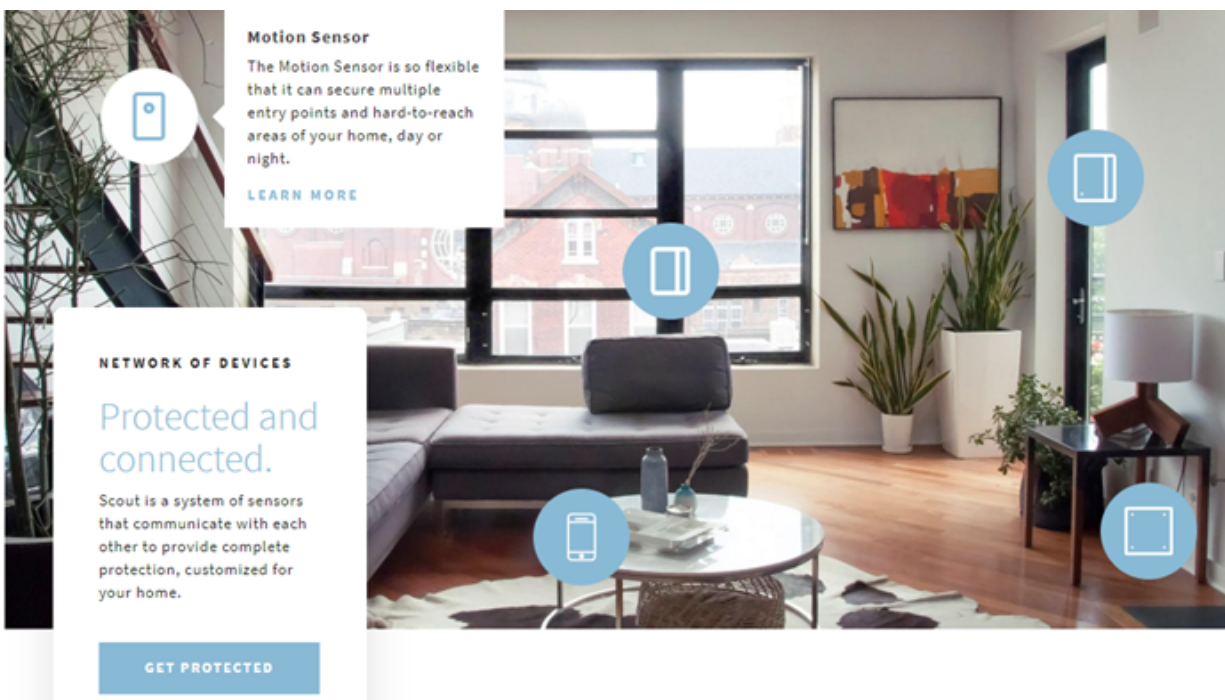
SELECT + CHOOSE SENSORS

Source: <https://www.scoutalarm.com/pages/build-your-system>



Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>

59. The infringing products provide a measurement means to measure the parameter of the circuit. For example, the Scout Security Wifi Home & Apartment Security System integrates with one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) to measure the magnitude of the parameter (such as voltage and/or current) of the circuit associated with the sensor. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Source: <https://www.scoutalarm.com/>

## Scout Packs

**MOST POPULAR**

**Scout Small Pack** **\$299.00**

The perfect introduction to Scout's DIY Home Security Products. Affordable security products for any sized home.

- Hub - 1x
- Door Panel - 1x
- Motion - 1x
- Access - 2x
- Key Fobs - 2x
- Yard Sign - 1x

Arctic  Midnight [ADD TO CART](#)

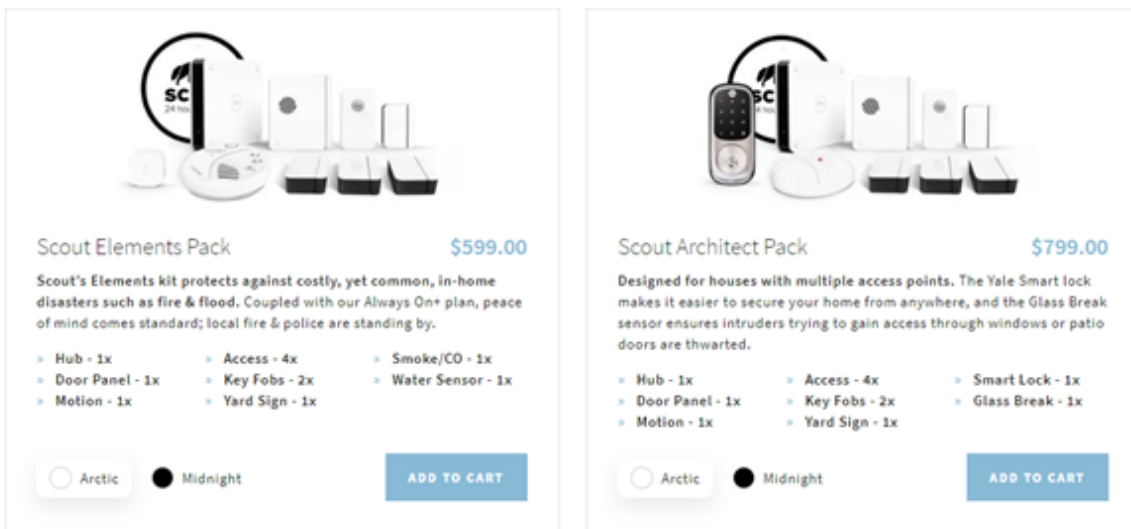
**Scout Large Pack** **\$449.00**

For larger homes and areas, the Large Pack offers a reliable, cost effective solution. These DIY Security Products strengthen your ability to monitor your home from anywhere via the Scout Mobile app.

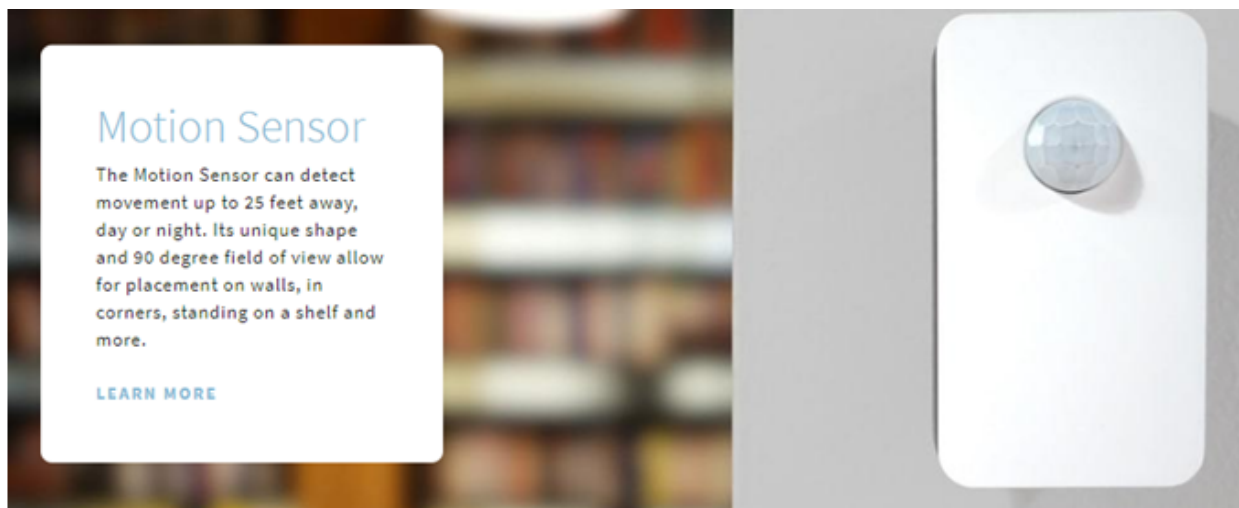
- Hub - 1x
- Door Panel - 1x
- Motion - 2x
- Access - 5x
- Key Fobs - 2x
- Yard Sign - 1x

Arctic  Midnight [ADD TO CART](#)

Source: <https://www.scoutalarm.com/collections/scout-packs>



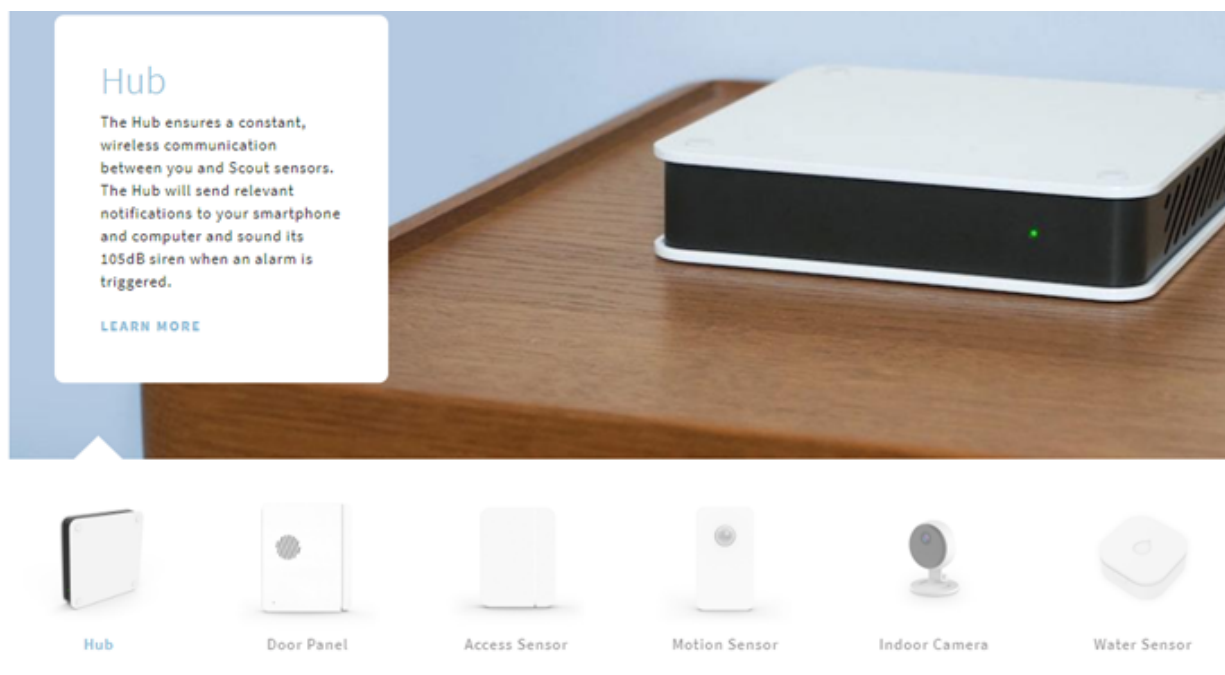
Source: <https://www.scoutalarm.com/collections/scout-packs>



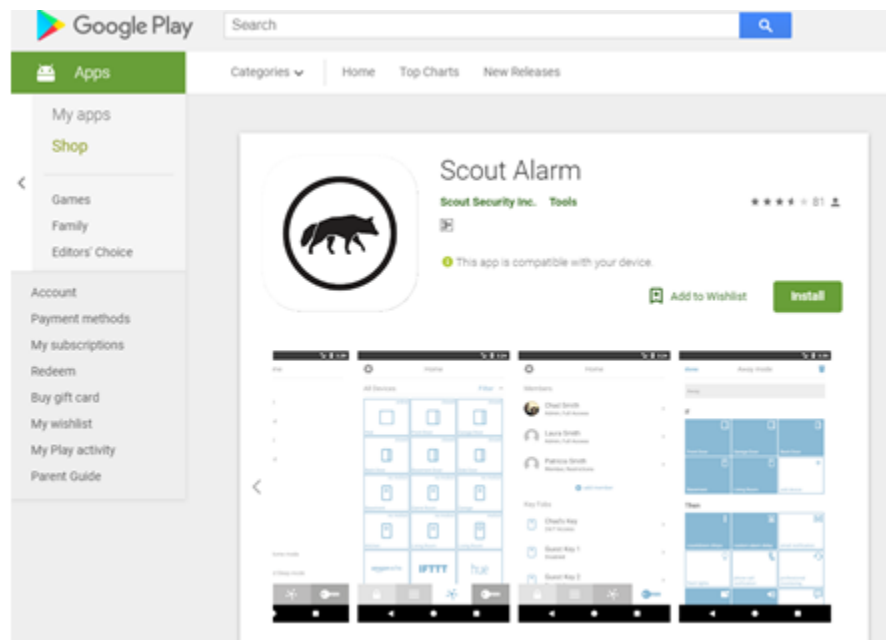
Source: <https://www.scoutalarm.com/pages/how-it-works>

60. The infringing products a comparison means to compare the measured parameter to a plurality of threshold values and to assign a status based on a result of the comparison. For example, the Scout Security Wifi Home & Apartment Security System integrates Scout Hub and at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) via a wireless communication network and compares the measured parameter with a threshold value to generates a status signal (such as alert, notification and/or

alarm). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



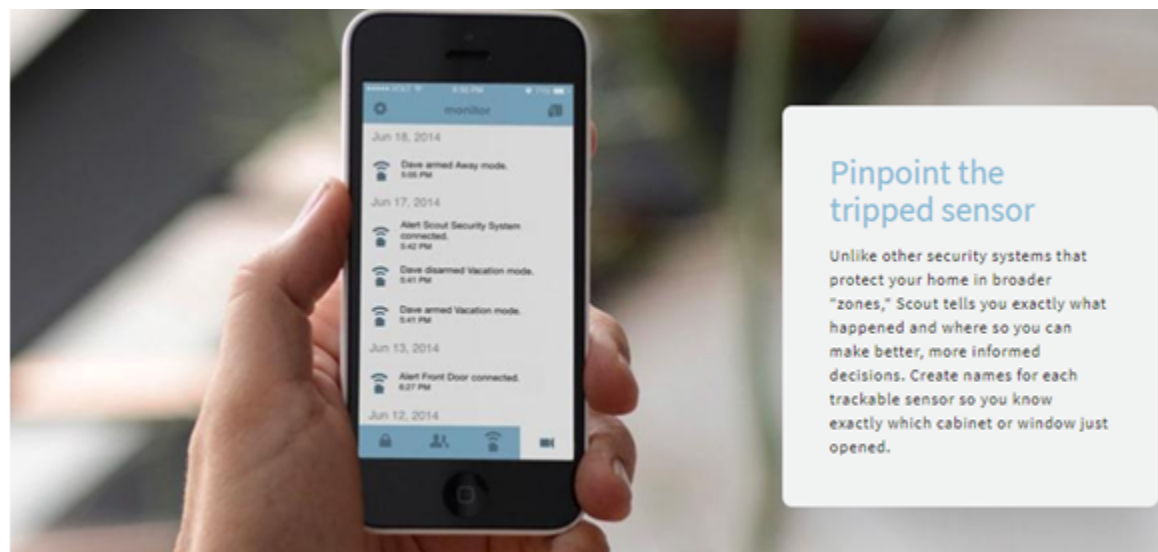
Source: <https://www.scoutalarm.com/pages/how-it-works>



Source: <https://play.google.com/store/apps/details?id=com.scoutalarm.android&hl=en>



Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>



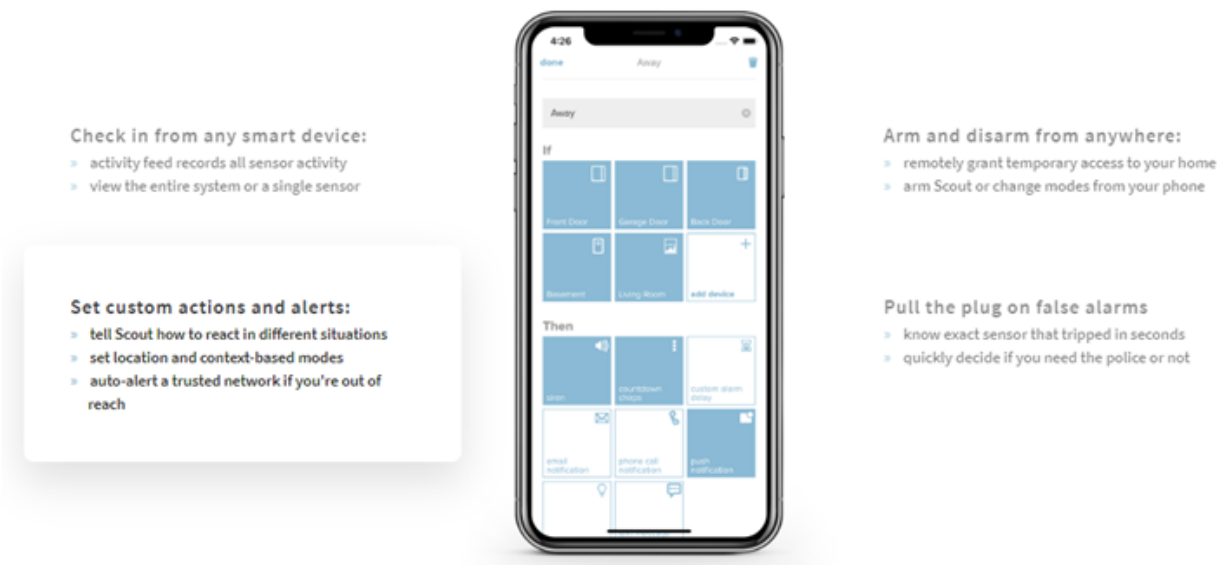
Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>





Source: <https://play.google.com/store/apps/details?id=com.scoutalarm.android&hl=en>

Your anytime, anywhere connection to your home.



Source: <https://www.scoutalarm.com/pages/how-it-works>

61. The infringing products provide a transmission means to communicate the status over a network and to limit the communicated status to only digital bits indicating the status and being sufficient to describe the status. For example, the Scout Security Wifi Home & Apartment Security system provides a communication module (“transmission means”) for at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) to transmit the status signal (such as alert, notification and/or alarm) via a wireless network (such as Wi-Fi, ZigBee, Z-Wave and/or 4G LTE) to a Scout Hub and/or mobile computing device (“display”). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

62. The infringing products provide a transmission means wherein the status communication is transmitted over the network to an output means configured to present an indication of the assigned status. For example, the Scout Security Wifi Home & Apartment Security System provides a mobile application (“Scout Alarm”) to display an indication (such

as alarm, notification and/or alerts) of at least one of the coupled sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) based on the signal assigned status on a computing device (such as smartphone, tablet and/or computer). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

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

64. 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.

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

**COUNT IV**  
**(INFRINGEMENT OF UNITED STATES PATENT NO. 8,912,893)**

66. Plaintiff incorporates paragraphs 1 through 65 herein by reference.

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

68. Plaintiff is the owner by assignment of the '893 Patent with sole rights to enforce the '893 Patent and sue infringers.

69. A copy of the '893 Patent, titled "Circuit Monitoring Device," is attached hereto as Exhibit D.

70. The '893 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

71. The claims of the '893 recite subject matter that is similar to that recited in the claims of the '683 Patent (discussed above in connection with Count I). The specification of

the '893 Patent discloses problems of prior systems and non-generic solutions in a manner similar to the specification of the '683 Patent (discussed above in connection with Count I).

72. The components recited in the claims (such as in claim 1 for example) are configured, such that they operate in a non-conventional manner.

73. The components recited in the claims (such as in claim 1 for example) are configured so as to allow a user to set customized ranges of values to be set as parameters of end-of-line modules (i.e., parameters of a circuit). Generic processors cannot provide this functionality. The '893 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

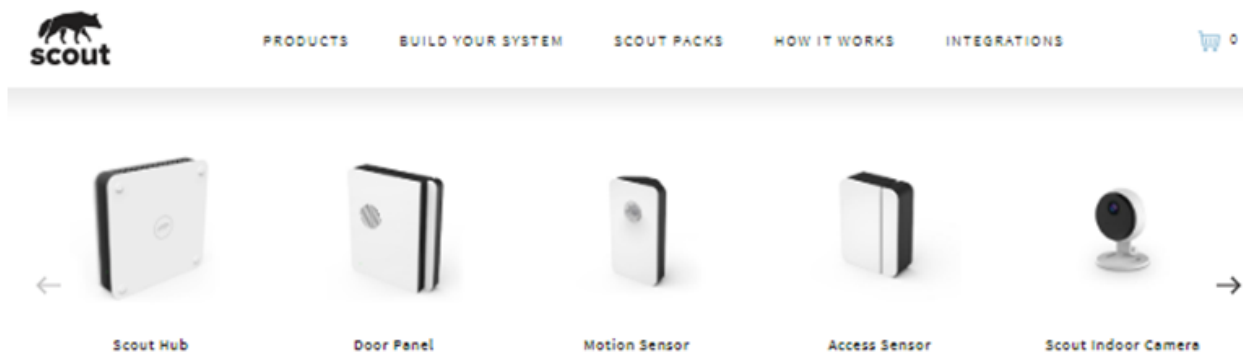
74. Collectively, the claimed embodiments in the '893 Patent provide new solutions to problems of traditional security monitoring systems. These solutions are enabled by non-generic components functioning in a non-conventional manner.

75. The '893 Patent solves a problem with the art that is rooted in computer technology. The '893 Patent does not merely recite the performance of some business practice known from the pre-Internet world along with the requirement to perform it on the Internet.

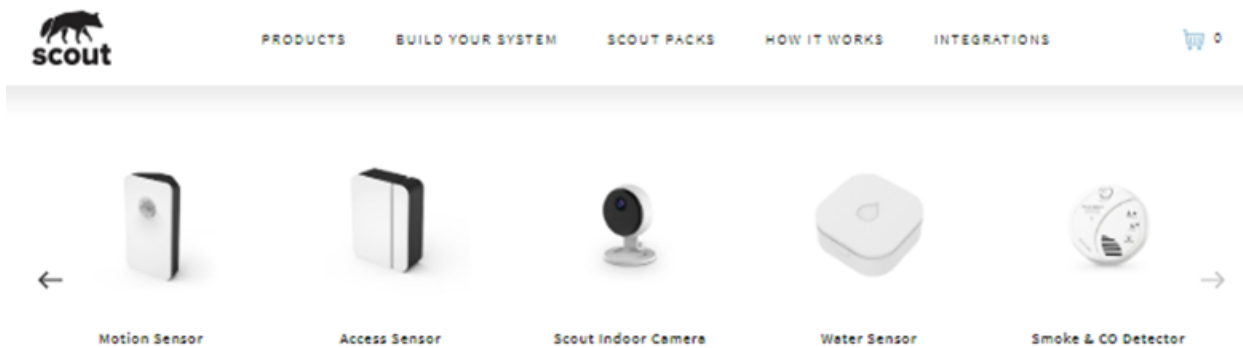
76. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claim 1, of the '893 Patent by making, using, importing, selling, and/or offering for sale, field devices, wireless systems, circuit monitoring devices, and/or components for such systems covered by one or more claims of the '893 Patent. Defendant causes infringement by its customers and users and encourages the use of accused devices through distribution, support and customer services. Defendant has infringed and continues to infringe the '893 Patent directly in violation of 35 U.S.C. § 271.

77. Regarding Claim 1, Defendant makes, uses, sells and/or offers for sale a circuit

monitoring device. For example, Defendant provides Wifi Home & Apartment Security Systems such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock (“device”) for monitoring the measurable parameter (such as inductance, resistance and/or capacitance). The system monitors the sensor such as electronic RFID door panel, window/cabinet/fridge motion access sensor, electronic door lock etc. Infringing products and certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



Source: <https://www.scoutalarm.com/>



Source: <https://www.scoutalarm.com/>



Source: <https://www.scoutalarm.com/pages/how-it-works>

A screenshot of the Scout Alarm website's product page for the Access Sensor. The Scout logo is in the top left. The navigation menu includes "PRODUCTS", "BUILD YOUR SYSTEM", "SCOUT PACKS", "HOW IT WORKS", and "INTEGRATIONS". A shopping cart icon shows 0 items. The product title "Access Sensor" is centered, with a price of "\$29.00" below it. A central image shows the sensor device. To the left of the device are three feature icons: a shield for "Guard Entry Points" (easily monitor opening of doors and windows), a wrench for "Simple Setup" (simple push-and-stick adhesive mounting), and a cabinet for "Versatile Use" (protect anything - a liquor cabinet, jewelry safe, or even the cookie jar!). To the right of the device is a plug icon for "Wire-Free" (battery-powered unit eliminates messy wires).

Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>



Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>

## Scout Hub

\$129

The brains of the system. Plugs into your router and talks wirelessly to the sensors.

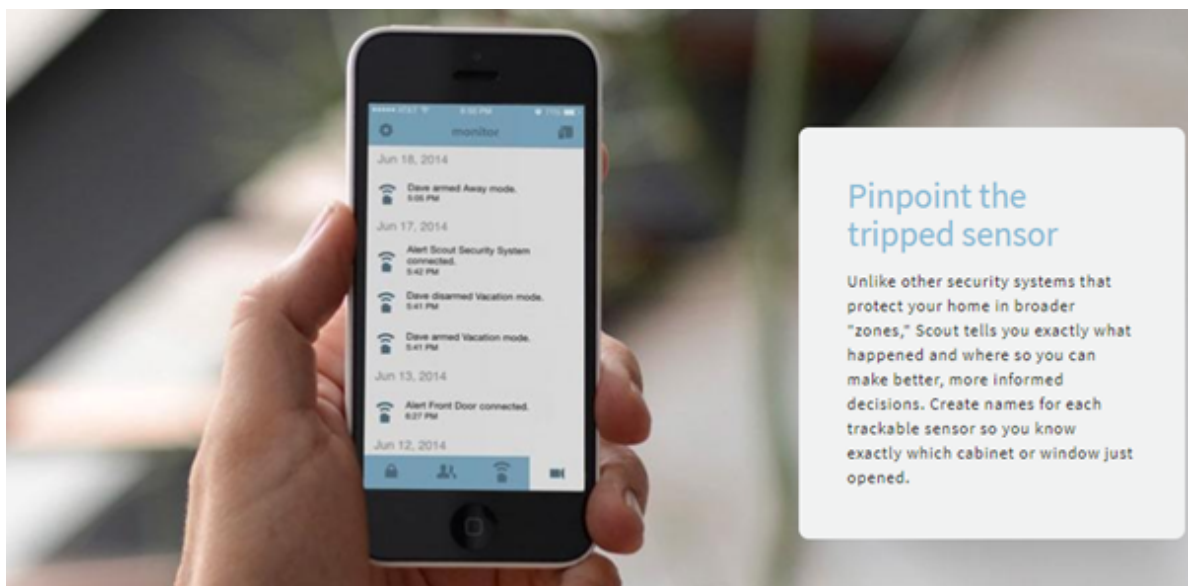
### SYSTEM FEATURES

- › Month-to-month, no long-term contracts
- › Simple, do-it-yourself installation
- › 4G cellular backup and battery backup included
- › Smart home integrations included
- › Self-monitor or add 24/7 police dispatch

*The Hub is equipped with 4G Cellular and battery backups, so you never lose security. A 105 dB siren deters intruders, and the ZigBee and Z-wave radios connect you to the best in class integrations.*



Source: <https://www.scoutalarm.com/pages/build-your-system>



Source: <https://www.scoutalarm.com/products/access-sensor?variant=12783050358826>

78. The infringing products provide one or more processors, each having a memory and an input electrically coupled to a circuit which is configured to receive a measured electrical parameter of the circuit, and modules comprising software to configure the one or more processors. For example, the Scout Security provides Wifi Home & Apartment Security Systems including Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock which comprises of one or more processors, each having a memory and an input (such as smoke, water and or intruder) electrically coupled to a sensor (including but not limited to motion sensor, sound detector and/or IR sensor) which is configured to receive the measured electrical parameter (such as voltage, inductance, current and/or resistance) of the circuit. Further, the Wifi Home & Apartment Security System also comprises software to configure one or more processors and integrate with a mobile computing device to generate alerts, notifications and/or alarms via a mobile app "Scout Alarm". Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

79. The infringing products a comparison module configured to compare a digital



value, which corresponds to a magnitude of the measured electrical parameter, to a plurality of threshold values stored in the memory, wherein the plurality of threshold values define a respective plurality of ranges of digital values, each range corresponding to one of a plurality of conditions of the circuit including a normal condition and at least one alarm condition. For example, the Scout Security Wifi Home & Apartment Security System provides a comparison module that integrates Scout Hub and at least one of the sensor (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) via a wireless communication network and compares the digital value (a voltage and/or current indicative count value i.e. low or high) corresponding to a magnitude of the measured electrical parameter (such as voltage, current, inductance and/or resistance) with a plurality of threshold values (such as normal value condition and/or alarm value condition (alert, notification, siren and/or panic button)) stored in the memory. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

80. The infringing products provide a comparison module to assign a status based on the digital value being within a particular range defined by one or more of the plurality of threshold values. For example, the Scout Security Wifi Home & Apartment Security Systems including Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock assigns a status (such as alarm, notification and/or alerts) based on the digital value (such as voltage and/or current indicative count value i.e. low or high) which is within a particular range defined by one or more of the plurality of threshold values (such as normal value condition and/or alarm value condition). Certain aspects of this element are illustrated in the screenshots provided in connection with

other allegations herein.

81. The infringing products provide a communication module configured to generate a status signal including at least the assigned status. For example, the Scout Security Wifi Home & Apartment Security System integrates Scout Hub and at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) via a wireless communication network which is configured to generate a status signal (such as motion, access, smoke and/or carbon monoxide) representative of the measured electrical parameter associated with the sensor. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

82. The infringing products provide a transmitter configured to transmit the status signal to a centralized system over a network for output, by the centralized system, of the status. For example, the Scout Security Wifi Home & Apartment Security System provides a communication module (“transmitter”) for at least one of the sensors (such as Door Panel, Motion Sensor, Access Sensor, Scout Indoor Camera, Water Sensor, Smoke & CO Detector, Glass Break Sensor and Door Lock) to a Scout Hub (“centralized system”) via a wireless network (such as Wi-Fi, ZigBee, Z-Wave and/or 4G LTE). Further, Scout Hub displays an indication (such as alarm, notification and/or alerts) of status signal to a mobile computing device via a mobile app “Scout Alarm.” Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

83. Defendant’s actions complained of herein will continue unless Defendant is enjoined by this court.

84. 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.

85. 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) Award Plaintiff past and future damages, costs, and expenses resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

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

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

Dated: May 7, 2019

Respectfully submitted,

*/s/Stamatios Stamoulis*

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**STAMATIOS STAMOULIS (#4606)**  
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**ATTORNEYS FOR PLAINTIFF**