

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

CIRCUIT VENTURES LLC,

Plaintiff,

vs.

HONEYWELL INTERNATIONAL, 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 Honeywell International, Inc. (“Defendant” or “Honeywell”) 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 its principal place of business located at 115 Tabor Road, Morris Plains, NJ, 07950. 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 Security Alarm Control panels (such as Single Door Access Control System, V-Plex Single-Door Access Control Module, Commercial Fire and Partitioned Burglary Alarm Control Panel) and Smart Home Security System including Camera Base Station, Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob ("Apparatus") 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.

Smart Home Security

-  **All-in-One Do-it-Yourself Home Security**
Simple to set up and use, it can change modes automatically as you come and go.
-  **Senses Motion & Sound, Captures & Sends HD Video**
Stays alert day or night with smart motion detection and night vision all recorded in crisp 1080p HD video, with full audio.
-  **Scheduled Facial Recognition***
Can recognize familiar faces to notify you if they arrive home when expected. If it sees someone it doesn't know, you'll get an alert on your phone to see a video clip of who's there.
-  **Amazon Alexa & Voice Control Built In**
Change modes with your voice, and talk to built-in Amazon Alexa to check the weather, ask questions, control other devices, and more.
-  **Smart Home Integration**
It's easy to connect compatible smart devices and services. When used with Outdoor MotionViewers™ your system can even use sounds and Z-Wave lights to deter intruders.



Source: <https://smarthomesecurity.honeywellhome.com/>

Extend your system with accessories



Indoor Motion Sensor
[Find out more](#)



Indoor Access Sensor
[Find out more](#)



Indoor MotionViewer™
[Find out more](#)




Outdoor MotionViewer™
[Find out more](#)



Key Fob
[Find out more](#)





Source: <https://smarthomesecurity.honeywellhome.com/#accessories>




Accessories

Indoor MotionViewer™ **Outdoor MotionViewer™** Motion Sensor Access Sensor Key Fob

Outdoor MotionViewer™

-  Intelligent motion detection with video capture
-  Outdoor discrete weather resistant design
-  Totally wireless
-  Battery powered - lasts up to 2 years

[Watch the video](#)



Source: <https://smarthomesecurity.honeywellhome.com/>

Get alerted when you leave a window or door open

Access Sensors are easy to install and extend your system so you're notified if any of your doors or windows are opened unexpectedly.



Alerts Night and Day, for 4 years*

The battery lasts up to 4 years so you rarely have to worry about changing it



Highly Sensitive Detection

Detects movement of less than an inch so you know when a window or door is open even slightly



Wireless Easy Installation

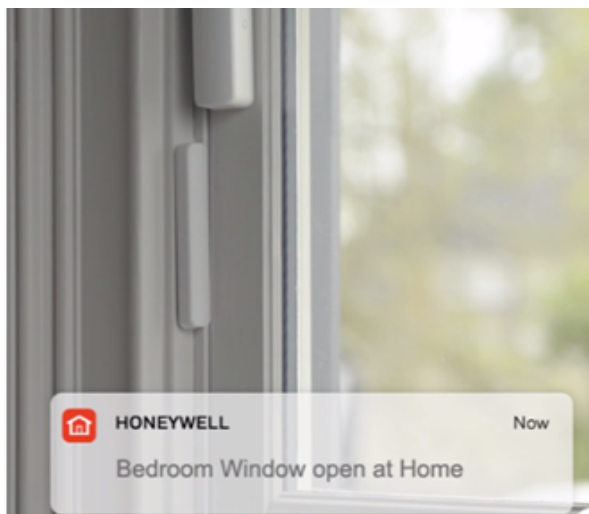
No screws or wires, just simple and fast installation

Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>






Smart Alerts

When you leave home, your Smart Home Security System can remind you about doors or windows that were left open. With highly sensitive detection and tamper-proof smart technology, you'll know when a door or window is opened even slightly, so you can rest assured knowing your home is secure.



Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

Indoor
MotionViewer™
for Smart Home Security

-  Smart Motion Alerts with Video Clips
-  Night Vision
-  Wireless 2-Year Battery Life*

[Buy now](#)

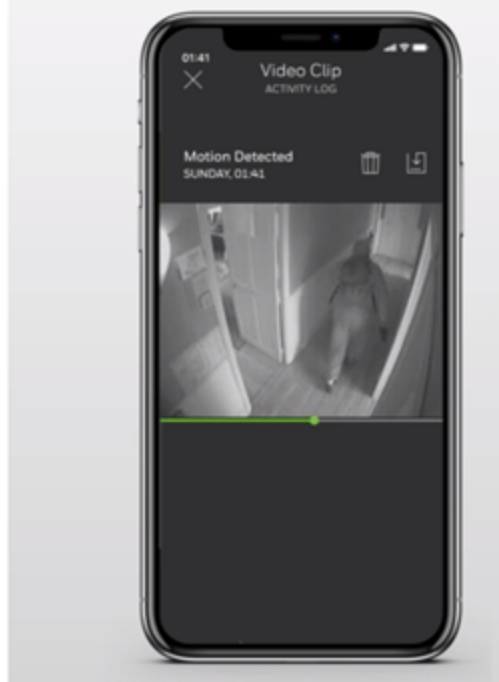
Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



See what's happening at home

No matter where you are, your MotionViewer™ helps you keep an eye on your home and loved ones. It records a ten second video clip in color when motion is detected and sends an alert to view the clip on your smart phone. So you know when the kids are home from school, or even if you have an unwanted visitor.

[Try in app demo](#)



Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



VISTAKEY

Now with 26-bit support!

Honeywell's VISTAKEY Single Door Access Control system is incredibly easy to install and configure. Designed to provide low-cost access control expansion for the popular VISTA-32FB, 128BP, 128FBP, 250BP or 250FBP Integration Ready Control Panels, the state-of-the-art module maximizes security investments by integrating access control, intrusion detection and fire detection into one system. Installation costs are reduced by eliminating the need to install additional wiring, panels and software.

VISTAKEY communicates with the control panel on a standard two-wire V-Plex® polling loop. Access validation time is minimized through Honeywell's patented Global Polling feature and special V-Plex protocol. Installation time is reduced through automatic enrollment and quick-start test functions. All programming can be accomplished locally by a keypad or remotely using Honeywell's Compass Downloader software. Specific system events can be reported to the central station via Honeywell's Contact ID.

Source: <https://www.security.honeywell.com/product-repository/vistakey>

Specifications	Ordering Info	Related
<ul style="list-style-type: none"> Supports 250 to 500 card holders and eight access groups A maximum of four to 15 doors* Wires on standard V-Plex polling loop Supports 26-bit standard HID® format - (H10301) Three input zones, supervised or unsupervised, can be used for door status monitoring Request-to-exit monitoring and cabinet monitoring (tamper) One open collector output trigger (sink 12mA @ 12VDC) 512 to 1,000* access control events recorded in VISTA event log Programmable locally from keypad or remotely from Compass Downloader UL listings: UL294, UL, CUL <p>*Panel dependent</p> <p>HID is a trademark or registered trademark of HID Global Corporation.</p>		

Source: <https://www.security.honeywell.com/product-repository/vistakey>



VISTA-128BPT/VISTA TURBO SERIES


The VISTA-128BPT is a powerful member of the Honeywell family of commercial alarm panels, integrating burglary, CCTV and access control functions. Many features are available that extend the applications of the VISTA-128BPT while simplifying end-user operation. The VISTA-128BPT and VISTA-128BPTSIA are listed for residential burglary, residential fire and commercial burglary applications (see agency listings in this document for more details). They are compatible with a wide range of AlarmNet communications products for alarm reporting, uploading /downloading and remote services.

Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>



Specifications	Ordering Info	Related
<p>Standard features (VISTA-128BPT and VISTA-128BPTSIA):</p> <ul style="list-style-type: none"> • Provides nine style-B hardwired zones • Supports up to 119 additional zones using a built-in polling (V-Plex[®], multiplex) loop interface • Supports up to 127 wireless zones using up to two 5800 series wireless receivers (fewer if using hardwire and/or polling loop zones) • Provides one power-limited bell circuit delivering 1.7Amp (max) at 12VDC • Provides the ability to control eight separate partitions independently, each functioning as if it had its own separate control • Accommodates 150 user codes with seven authority levels • Accommodates 32 keypad macro commands per system • Keeps a log of up to 512 events • Supports up to 16 compatible two-wire smoke detectors on zone 1 • Zone 7 may be used for keyswitch arming/disarming • Integrates with WIN-PAK access control systems to provide increased users, event log and scheduling • Supports V-Plex addressable VISTAKEY access control (up to eight doors and 250 cards) • Easily programmed and maintained by Compass Windows-based downloader • Supports up to 96 programmable outputs • Programmable to meet SIA false alarm prevention specifications. To meet UL approval for ANSI/SIA CP-01-2010, order part number V128BPTSIA • Supports up to six touchscreen Advanced User Interface (AUI) devices (6272 or later) • Smoke detector reset at keypad • Quick exit • Group bypass • Arm faulted • Event arming • Carbon monoxide (CO) zone type support • Expanded high-speed RS-232 capability for third party interface and automation • Internet upload/download over AlarmNet GSM and/or IP communicators over the panel's keypad (ECP) bus • Ringback support for AlarmNet communicators (confirmation of closing report) • 24-hour dialer test support for AlarmNet devices • Supports V-Plex Smart Contact feature for improved responsiveness on systems with many V-Plex zones • Telco line cut detection 		

Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>

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 Smart Home Security System integrates with at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) 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.



Outdoor
MotionViewer™
for Smart Home Security

-  Smart Motion Alerts with Video Clips
-  Night Vision
-  Wireless 2-Year Battery Life*

[Buy now](#)

Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>

More than a motion sensor. Smart detection you can see.

Allow the Outdoor MotionViewer™ to extend your system so that you can keep an eye on the front door, back yard or garage.



Senses Motion, Sends Video

Take awareness outdoors with long-range detection up to 33ft (10m) and a 90° field of view



Alert Night & Day, for 2 Years*

Night vision means it's on watch around the clock, with a 2-year battery*



Pet-Friendly Smart Detection

Small animals (Up to 36kg) won't cause false alarms, so don't worry about your pet, birds or a moving branch triggering the system

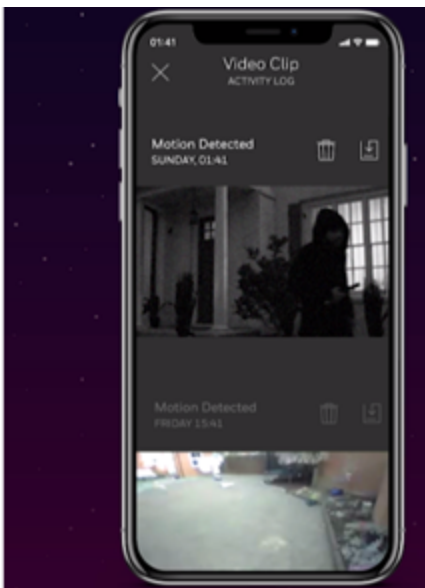
Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>



Alerts Day and Night

The MotionViewer™ is unique: Totally wireless. Battery operated. With night vision and infrared. It's highly weather resistant to let you keep watch day and night for 2 years*. And when it senses motion, you get a video clip – so you can see what's moving outside your home, whether it's the kids arriving home from school or an unwanted visitor.

[Try the App Demo](#)



Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>



Deter Intruders & Early Alerts

With intruder deterrence, when the Outdoor MotionViewer™ detects unwanted motion, your Smart Home Security System even plays sounds – like a barking dog – to make your home appear occupied. Even when the system is in Home mode, the Outdoor MotionViewer™ can play a simple alert tone, to let you know someone is approaching.

Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>

– When will Camera Base Station sound an alarm?

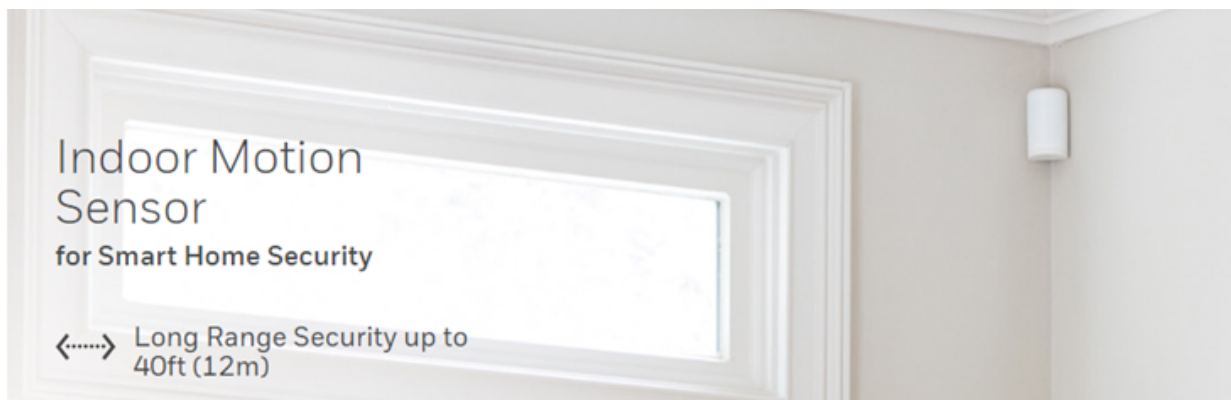
Camera Base Station sound an alarm when any of the following has occurred:

- A Motion Sensor or Indoor MotionViewer has picked up on movement within your home when your system is in AWAY mode
- Entry delay has expired after a door with an Access Sensor had been opened and the system was in either AWAY or NIGHT mode
- A window with an Access Sensor was opened when the system was either in NIGHT or AWAY mode
- Exit delay expires after system was switched to AWAY mode, but you didn't leave yet – you might mistakenly set off a Motion Sensor or an Indoor MotionViewer to cause an alarm
- System is in AWAY or NIGHT modes and any of the sensors appears to be tampered with – opening the case of any sensor in these modes will result in an immediate alarm

Any time Camera Base Station sounds an alarm, you can expect to receive an alert on your phone so long as you're in an area with coverage and you've enabled our app to send you notifications. You can see what's happening by looking at the live video feed from Camera Base Station, and take the appropriate action.

Source: <https://www.honeywellhome.com/en/smart-home-security-faqs-guides-videos? ga=2.134341553.1127803632.1552563696-579322085.1552563696#notes>

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 Smart Home Security System comprises 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://smarthomesecurity.honeywellhome.com/motion-sensor/>

Smart home detection without false alerts

Your Smart Home Security System covers more square footage when you add Indoor Motion Sensors to other rooms. Receive an alert when motion is detected, so you can know if someone is in the house when it should be empty.



Pet-Friendly Motion Detection

Isn't alarmed by background motion like fans, robot vacuums or pets up to 79 lb (36 kg)



Alerts Night and Day, for 3 years*

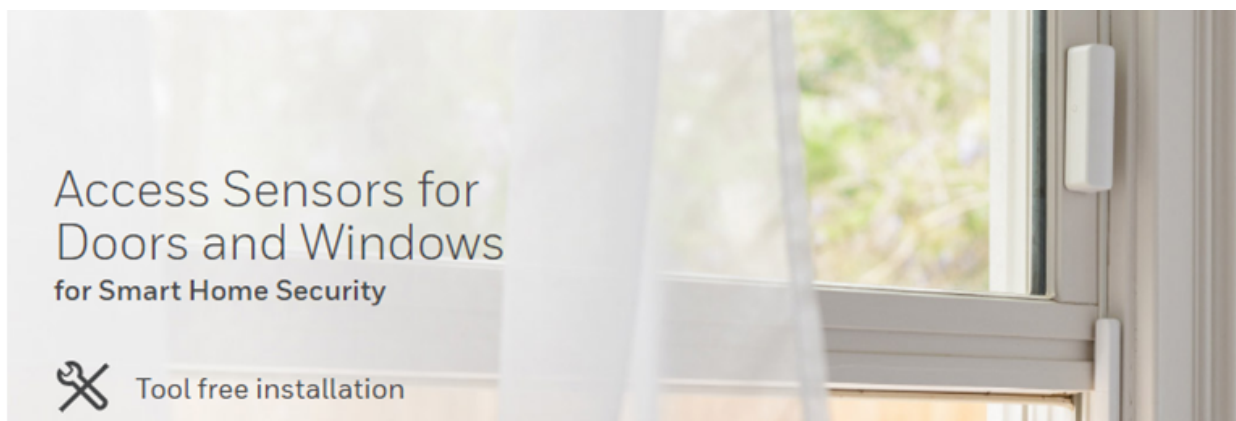
The long-life battery is super easy to replace



Completely Wireless

No wires or screws ensures easy installation

Source: <https://smarthomesecurity.honeywellhome.com/motion-sensor/>



Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

Get alerted when you leave a window or door open

Access Sensors are easy to install and extend your system so you're notified if any of your doors or windows are opened unexpectedly.



Alerts Night and Day, for 4 years*

The battery lasts up to 4 years so you rarely have to worry about changing it



Highly Sensitive Detection

Detects movement of less than an inch so you know when a window or door is open even slightly



Wireless Easy Installation

No screws or wires, just simple and fast installation

Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

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 Smart Home Security System integrates with Camera Base Station and at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) via a wireless communication network and compares the count value with a threshold value which generates a status signal (such as video recording, alert, notification and/or alarm). The status signal has at least two possible values (high or low) which is greater than or less than the threshold value. Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

– **When will Camera Base Station sound an alarm?**

Camera Base Station sound an alarm when any of the following has occurred:

- A Motion Sensor or Indoor MotionViewer has picked up on movement within your home when your system is in AWAY mode
- Entry delay has expired after a door with an Access Sensor had been opened and the system was in either AWAY or NIGHT mode
- A window with an Access Sensor was opened when the system was either in NIGHT or AWAY mode
- Exit delay expires after system was switched to AWAY mode, but you didn't leave yet – you might mistakenly set off a Motion Sensor or an Indoor MotionViewer to cause an alarm
- System is in AWAY or NIGHT modes and any of the sensors appears to be tampered with – opening the case of any sensor in these modes will result in an immediate alarm

Any time Camera Base Station sounds an alarm, you can expect to receive an alert on your phone so long as you're in an area with coverage and you've enabled our app to send you notifications. You can see what's happening by looking at the live video feed from Camera Base Station, and take the appropriate action.

Source: <https://www.honeywellhome.com/en/smart-home-security-faqs-guides-videos? ga=2.134341553.1127803632.1552563696-579322085.1552563696#notes>

Technical Specifications



Battery

CR123A Lithium

Estimated Battery Life

Up to 4 years based on typical usage

Connectivity

Wireless Connectivity

Honeywell Secure Wiselink® Protocol

300ft Range, clear line of sight

Dimensions (L x W x D)

3.72 x 1.01 x 0.92 inches

94.5 x 25.7 x 23.2 mm

Weight

1.7 oz (48 g)






Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>



Source: <https://smarthomesecurity.honeywellhome.com/>

23. The infringing products provide a transmission means for transmitting said status signal via a communications network to a display. For example, the Smart Home Security System comprises a communication module (“transmission means”) for at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) to transmit the status signal via a wireless network (such as Wi-Fi, Z-Wave and/or Honeywell Secure Wiselink Protocol) to a Camera Base Station and/or a mobile computing device (“display”). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

Smart Home Security

-  **All-in-One Do-it-Yourself Home Security**
Simple to set up and use, it can change modes automatically as you come and go.
-  **Senses Motion & Sound, Captures & Sends HD Video**
Stays alert day or night with smart motion detection and night vision all recorded in crisp 1080p HD video, with full audio.
-  **Scheduled Facial Recognition***
Can recognize familiar faces to notify you if they arrive home when expected. If it sees someone it doesn't know, you'll get an alert on your phone to see a video clip of who's there.
-  **Amazon Alexa & Voice Control Built In**
Change modes with your voice, and talk to built-in Amazon Alexa to check the weather, ask questions, control other devices, and more.
-  **Smart Home Integration**
It's easy to connect compatible smart devices and services. When used with Outdoor MotionViewers™ your system can even use sounds and Z-Wave lights to deter intruders.



Source: <https://smarthomesecurity.honeywellhome.com/>

Technical Specifications



Camera

90° field of view

Resolution

QVGA (320x240)

Video Format

10 second colour video clip H.264 @ 10 fps

Battery

3 CR123A Lithium

Estimated Battery Life

Up to 2 years based on typical usage

Connectivity

Wireless Connectivity
Honeywell Secure Wiselink® Protocol
300ft Range, clear line of sight

Detection Distance

Up to 23 ft (7m)

Dimensions (L x W x D)

4.95 x 2.0 x 1.82 inches
125.7 x 50.8 x 46.2 mm

Weight

With sliding plate 5.82 oz (165 g)
With desk mount 6.35 oz (180 g)

Size (H x W x D)

4.92 x 2.05 x 1.81 inches
(125 x 52.1 x 46 mm)

Box Includes

Outdoor MotionViewer™ | Wall bracket | 4 Fixing screws for wall bracket | 3 CR123A lithium batteries | Quick-start guide

Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>



Smarter Alerts

With Smart Home Security you get more than the usual 'something happened'.

- A notification that the kids are home, prompted by facial recognition*.
- A video clip of movement in the yard, captured by a MotionViewer™.
- Helpful alerts that your window upstairs was open when you left home.

Whatever your system detects, it soon lets you know.



Source: <https://smarthomesecurity.honeywellhome.com/>

Deter unwanted visitors

When combined with Outdoor MotionViewers™, your Smart Home Security system can help keep unwanted visitors away by working with your other smart devices to simulate an occupied home. The system can turn on compatible lights, and the 90-decibel internal speaker can play sounds like a barking dog, to make any potential intruder think twice.



Source: <https://smarthomesecurity.honeywellhome.com/>

24. The infringing products provide a display means for displaying an indication of said assigned status. For example, the Smart Home Security System comprises the Camera Base Station (“a display”) to display an indication (such as alarm, LED light) of at least one of the coupled sensor based on the signal assigned status. Further, the Smart Home Security System provides a mobile application (“Honeywell Home”) to display an indication (such as video recording, alarm, notification and/or alerts) of at least one of the coupled sensor (such as Indoor

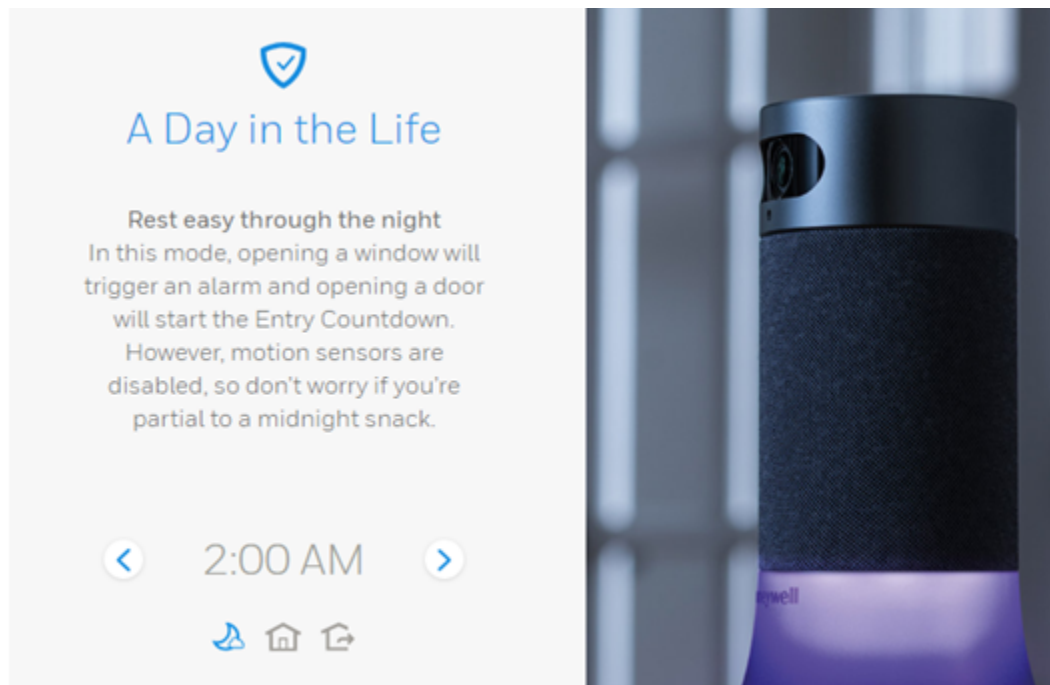
Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) based on the signal assigned status on a computing device (such as smartphone, tablet and/or computer). Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



Security you control with your voice

Change your system's mode with simple voice commands. Or ask built-in Amazon Alexa to switch on a lamp, turn up the thermostat, or dim the lights – without lifting a finger.

Source: <https://smarthomesecurity.honeywellhome.com/>



Source: <https://smarthomesecurity.honeywellhome.com/>

Apps

Categories Home Top Charts New Releases

My apps
Shop
Games
Family
Editors' Choice

Account
Payment methods
My subscriptions
Redeem
Buy gift card
My wishlist
My Play activity
Parent Guide

Honeywell Home

Resideo Technologies, Inc. Lifestyle

★★★★☆ 8,301

Ⓧ This app is incompatible with your device.

Add to Wishlist

Honeywell Lyric is now Honeywell Home
Same Account, New Capabilities, More Devices
We're saying "goodbye" to the Honeywell Lyric app and "hello" to the Honeywell Home app to make room for big improvements.

One-Touch Dashboard
Control all your devices in a single view

All-in-one Security
Monitored and installed by you, with Amazon Alexa built in

Thermost
Comfort when you when you

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

App Store Preview

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



Honeywell Home 4+

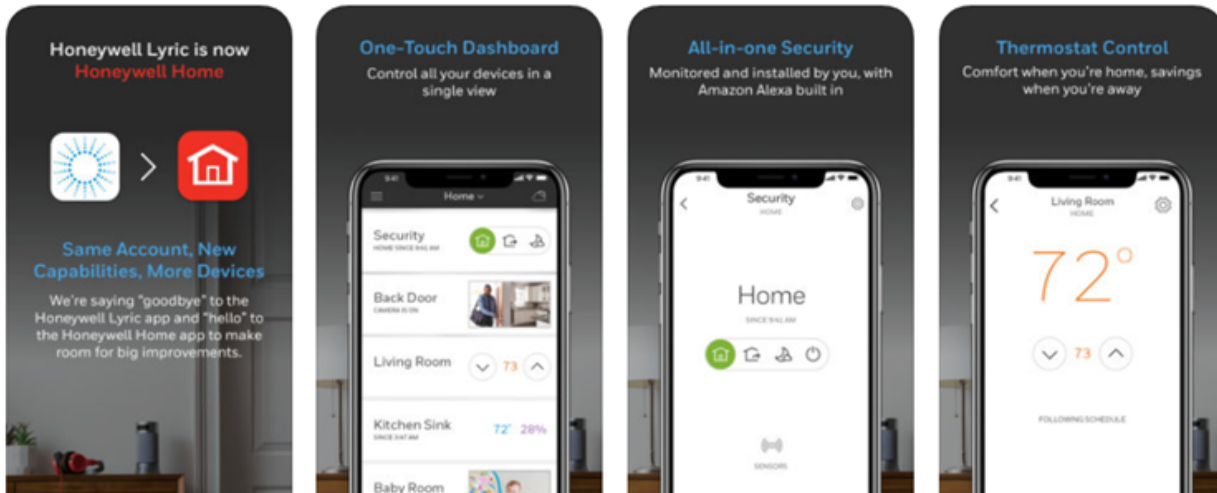
Resideo Technologies, Inc.

#163 in Lifestyle

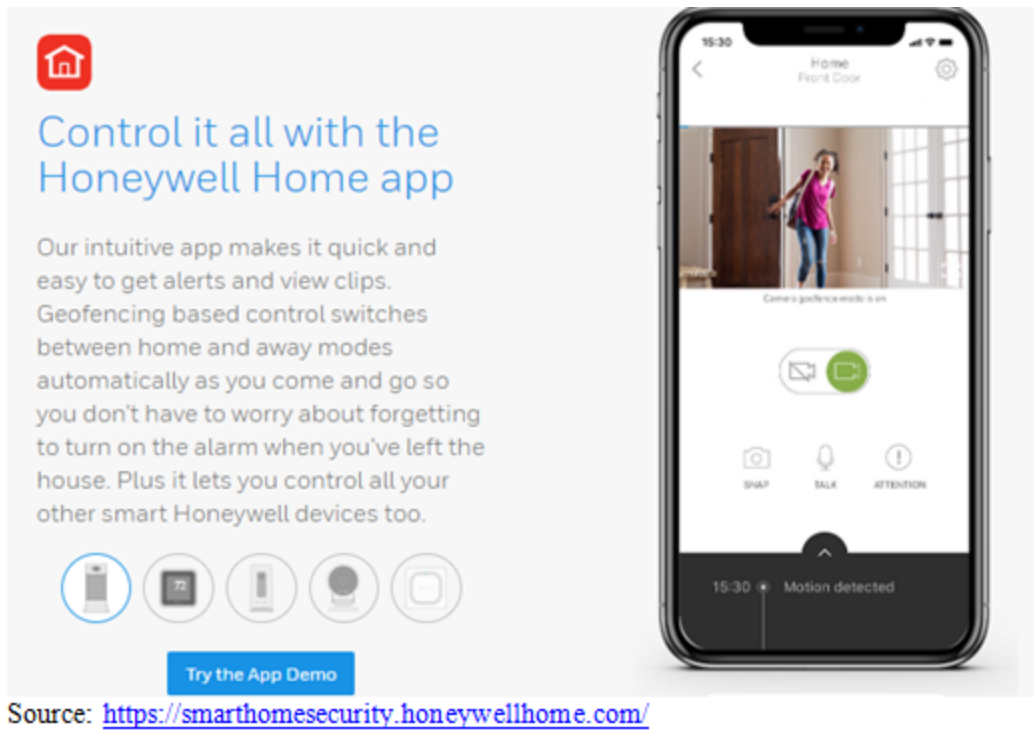
★★★★★ 4.5, 94.7K Ratings

Free

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



Source: <https://itunes.apple.com/us/app/honeywell-home/id880332077?mt=8>



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 Security Alarm Control panels (such as Single Door Access Control System, V-Plex Single-Door Access Control Module, Commercial Fire and Partitioned Burglary Alarm Control Panel) and Smart Home Security System for monitoring a circuit associated with at least one of the sensor (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob). Further, the Smart Home Security System comprising Camera Base Station ("central system") also couples to the sensor using wireless network (such as Wi-Fi, Z-Wave and/or Honeywell Secure Wiselink Protocol). 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.

Smart Home Security

-  **All-in-One Do-it-Yourself Home Security**
Simple to set up and use, it can change modes automatically as you come and go.
-  **Senses Motion & Sound, Captures & Sends HD Video**
Stays alert day or night with smart motion detection and night vision all recorded in crisp 1080p HD video, with full audio.
-  **Scheduled Facial Recognition***
Can recognize familiar faces to notify you if they arrive home when expected. If it sees someone it doesn't know, you'll get an alert on your phone to see a video clip of who's there.
-  **Amazon Alexa & Voice Control Built In**
Change modes with your voice, and talk to built-in Amazon Alexa to check the weather, ask questions, control other devices, and more.
-  **Smart Home Integration**
It's easy to connect compatible smart devices and services. When used with Outdoor MotionViewers™ your system can even use sounds and Z-Wave lights to deter intruders.



Source: <https://smarthomesecurity.honeywellhome.com/>

Extend your system with accessories



Indoor Motion Sensor
[Find out more](#)



Indoor Access Sensor
[Find out more](#)



Indoor MotionViewer™
[Find out more](#)



Outdoor MotionViewer™
[Find out more](#)



Key Fob
[Find out more](#)

Source: <https://smarthomesecurity.honeywellhome.com/#accessories>



Accessories

Indoor MotionViewer™ **Outdoor MotionViewer™** Motion Sensor Access Sensor Key Fob

Outdoor MotionViewer™

-  Intelligent motion detection with video capture
-  Outdoor discrete weather resistant design
-  Totally wireless
-  Battery powered - lasts up to 2 years

 Watch the video



Source: <https://smarthomesecurity.honeywellhome.com/>

Get alerted when you leave a window or door open

Access Sensors are easy to install and extend your system so you're notified if any of your doors or windows are opened unexpectedly.



Alerts Night and Day, for 4 years*

The battery lasts up to 4 years so you rarely have to worry about changing it



Highly Sensitive Detection

Detects movement of less than an inch so you know when a window or door is open even slightly



Wireless Easy Installation

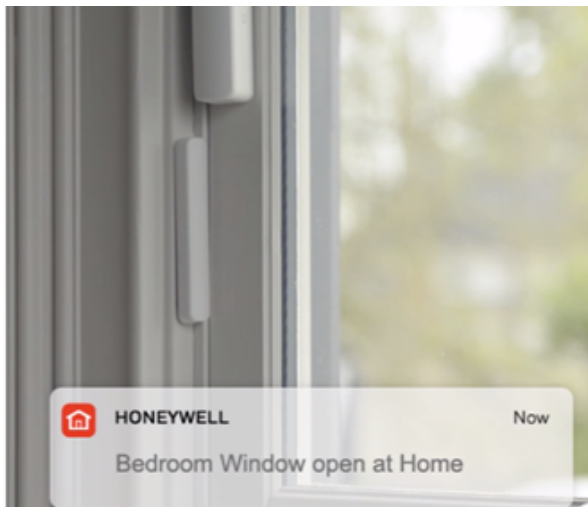
No screws or wires, just simple and fast installation

Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>






Smart Alerts

When you leave home, your Smart Home Security System can remind you about doors or windows that were left open. With highly sensitive detection and tamper-proof smart technology, you'll know when a door or window is opened even slightly, so you can rest assured knowing your home is secure.




Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

Indoor MotionViewer™
for Smart Home Security

-  Smart Motion Alerts with Video Clips
-  Night Vision
-  Wireless 2-Year Battery Life*

[Buy now](#)



Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



VISTAKEY

Now with 26-bit support!

Honeywell's VISTAKEY Single Door Access Control system is incredibly easy to install and configure. Designed to provide low-cost access control expansion for the popular VISTA-32FB, 128BP, 128FBP, 250BP or 250FBP Integration Ready Control Panels, the state-of-the-art module maximizes security investments by integrating access control, intrusion detection and fire detection into one system. Installation costs are reduced by eliminating the need to install additional wiring, panels and software.

VISTAKEY communicates with the control panel on a standard two-wire V-Plex® polling loop. Access validation time is minimized through Honeywell's patented Global Polling feature and special V-Plex protocol. Installation time is reduced through automatic enrollment and quick-start test functions. All programming can be accomplished locally by a keypad or remotely using Honeywell's Compass Downloader software. Specific system events can be reported to the central station via Honeywell's Contact ID.

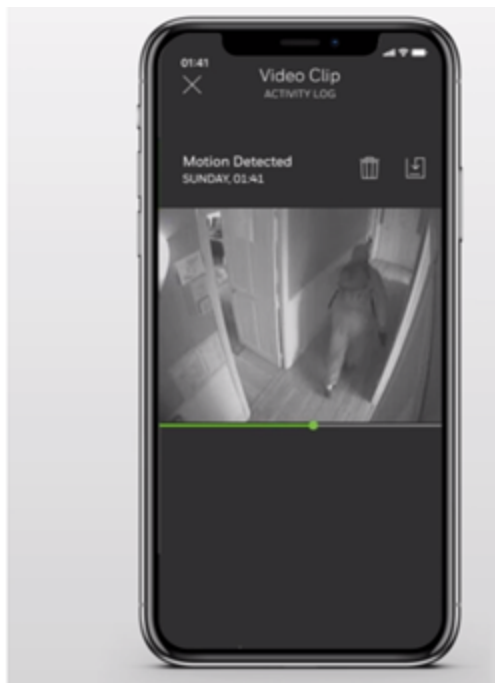
Source: <https://www.security.honeywell.com/product-repository/vistakey>



See what's happening at home

No matter where you are, your MotionViewer™ helps you keep an eye on your home and loved ones. It records a ten second video clip in color when motion is detected and sends an alert to view the clip on your smart phone. So you know when the kids are home from school, or even if you have an unwanted visitor.

[Try in app demo](#)



Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



VISTAKEY

Now with 26-bit support!

Honeywell's VISTAKEY Single Door Access Control system is incredibly easy to install and configure. Designed to provide low-cost access control expansion for the popular VISTA-32FB, 128BP, 128FBP, 250BP or 250FBP Integration Ready Control Panels, the state-of-the-art module maximizes security investments by integrating access control, intrusion detection and fire detection into one system. Installation costs are reduced by eliminating the need to install additional wiring, panels and software.

VISTAKEY communicates with the control panel on a standard two-wire V-Plex® polling loop. Access validation time is minimized through Honeywell's patented Global Polling feature and special V-Plex protocol. Installation time is reduced through automatic enrollment and quick-start test functions. All programming can be accomplished locally by a keypad or remotely using Honeywell's Compass Downloader software. Specific system events can be reported to the central station via Honeywell's Contact ID.

Source: <https://www.security.honeywell.com/product-repository/vistakey>

Specifications	Ordering Info	Related
<ul style="list-style-type: none"> • Supports 250 to 500 card holders and eight access groups • A maximum of four to 15 doors* • Wires on standard V-Plex polling loop • Supports 26-bit standard HID® format - (H10301) • Three input zones, supervised or unsupervised, can be used for door status monitoring • Request-to-exit monitoring and cabinet monitoring (tamper) • One open collector output trigger (sink 12mA @ 12VDC) • 512 to 1,000* access control events recorded in VISTA event log • Programmable locally from keypad or remotely from Compass Downloader • UL listings: UL294, UL, CUL <p>*Panel dependent</p> <p>HID is a trademark or registered trademark of HID Global Corporation.</p>		

Source: <https://www.security.honeywell.com/product-repository/vistakey>



VISTA-128BPT/VISTA TURBO SERIES

The VISTA-128BPT is a powerful member of the Honeywell family of commercial alarm panels, integrating burglary, CCTV and access control functions. Many features are available that extend the applications of the VISTA-128BPT while simplifying end-user operation. The VISTA-128BPT and VISTA-128BPTSIA are listed for residential burglary, residential fire and commercial burglary applications (see agency listings in this document for more details). They are compatible with a wide range of AlarmNet communications products for alarm reporting, uploading /downloading and remote services.

Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>

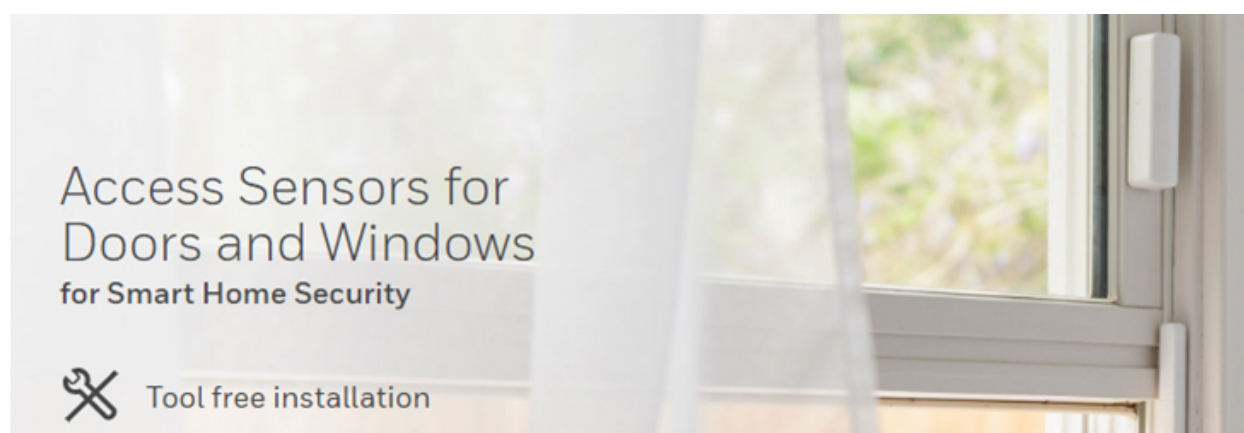
Specifications	Ordering Info	Related
<p>Standard features (VISTA-128BPT and VISTA-128BPTSIA):</p> <ul style="list-style-type: none"> • Provides nine style-B hardwired zones • Supports up to 119 additional zones using a built-in polling (V-Plex®, multiplex) loop interface • Supports up to 127 wireless zones using up to two 5800 series wireless receivers (fewer if using hardwire and/or polling loop zones) • Provides one power-limited bell circuit delivering 1.7Amp (max) at 12VDC • Provides the ability to control eight separate partitions independently, each functioning as if it had its own separate control • Accommodates 150 user codes with seven authority levels • Accommodates 32 keypad macro commands per system • Keeps a log of up to 512 events • Supports up to 16 compatible two-wire smoke detectors on zone 1 • Zone 7 may be used for keyswitch arming/disarming • Integrates with WIN-PAK access control systems to provide increased users, event log and scheduling • Supports V-Plex addressable VISTAKEY access control (up to eight doors and 250 cards) • Easily programmed and maintained by Compass Windows-based downloader • Supports up to 96 programmable outputs • Programmable to meet SIA false alarm prevention specifications. To meet UL approval for ANSI/SIA CP-01-2010, order part number V128BPTSIA • Supports up to six touchscreen Advanced User Interface (AUI) devices (6272 or later) • Smoke detector reset at keypad • Quick exit • Group bypass • Arm faulted • Event arming • Carbon monoxide (CO) zone type support • Expanded high-speed RS-232 capability for third party interface and automation • Internet upload/download over AlarmNet GSM and/or IP communicators over the panel's keypad (ECP) bus • Ringback support for AlarmNet communicators (confirmation of closing report) • 24-hour dialer test support for AlarmNet devices • Supports V-Plex Smart Contact feature for improved responsiveness on systems with many V-Plex zones • Telco line cut detection 		

Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>

41. The infringing products provide a circuit module to determine a status of the circuit. For example, the Smart Home Security System integrates with at least one of the sensors (“circuit module”) (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) to determine a status (such as motion and/or access) 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://smarthomesecurity.honeywellhome.com/motion-sensor/>



Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

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 Smart Home Security System comprises a network communication module coupled with at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) to communicate a signal indicative of the assigned status (such as motion, and/or access) to the Camera Base Station (“central system”) via a wireless network (such as Wi-Fi, Z-Wave and/or Honeywell Secure Wiselink Protocol). The communication module is dedicated to communicate with the Camera Base Station 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 Smart Home Security System comprises the Camera Base Station (“a display”) to display an indication (such as alarm, LED light) of at least one of the coupled sensor based on the signal assigned status. Further, the Smart Home Security System provides a mobile application “Honeywell Home” to present an indication (such as video recording, 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 and/or access). 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 provided in connection with other allegations herein.

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 Security Alarm Control panels (such as Single Door Access Control System, V-Plex Single-Door Access Control Module, Commercial Fire and Partitioned Burglary Alarm Control Panel) and Smart Home Security System including Camera Base Station, Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob ("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.

Smart Home Security

-  **All-in-One Do-it-Yourself Home Security**
Simple to set up and use, it can change modes automatically as you come and go.
-  **Senses Motion & Sound, Captures & Sends HD Video**
Stays alert day or night with smart motion detection and night vision all recorded in crisp 1080p HD video, with full audio.
-  **Scheduled Facial Recognition***
Can recognize familiar faces to notify you if they arrive home when expected. If it sees someone it doesn't know, you'll get an alert on your phone to see a video clip of who's there.
-  **Amazon Alexa & Voice Control Built In**
Change modes with your voice, and talk to built-in Amazon Alexa to check the weather, ask questions, control other devices, and more.
-  **Smart Home Integration**
It's easy to connect compatible smart devices and services. When used with Outdoor MotionViewers™ your system can even use sounds and Z-Wave lights to deter intruders.



Source: <https://smarthomesecurity.honeywellhome.com/>

Extend your system with accessories



Indoor Motion Sensor
[Find out more](#)



Indoor Access Sensor
[Find out more](#)



Indoor MotionViewer™
[Find out more](#)



Outdoor MotionViewer™
[Find out more](#)



Key Fob
[Find out more](#)

Source: <https://smarthomesecurity.honeywellhome.com/#accessories>



Accessories

Indoor MotionViewer™

Outdoor MotionViewer™

Motion Sensor

Access Sensor

Key Fob

Outdoor MotionViewer™



Intelligent motion detection with video capture



Outdoor discrete weather resistant design



Totally wireless



Battery powered - lasts up to 2 years



Watch the video



Source: <https://smarthomesecurity.honeywellhome.com/>

Get alerted when you leave a window or door open

Access Sensors are easy to install and extend your system so you're notified if any of your doors or windows are opened unexpectedly.



Alerts Night and Day, for 4 years*

The battery lasts up to 4 years so you rarely have to worry about changing it



Highly Sensitive Detection

Detects movement of less than an inch so you know when a window or door is open even slightly



Wireless Easy Installation

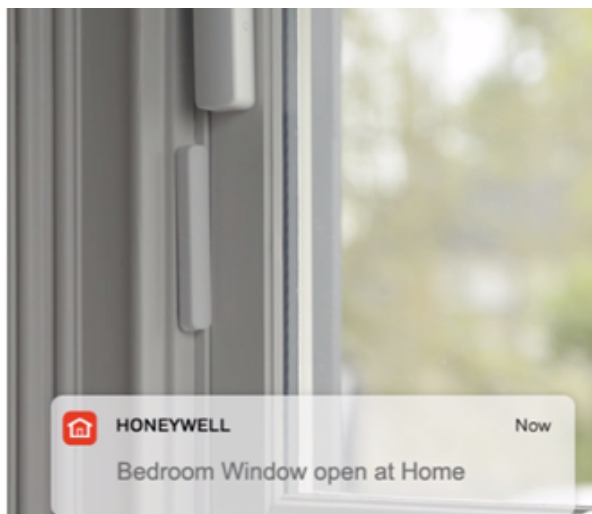
No screws or wires, just simple and fast installation

Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>






Smart Alerts

When you leave home, your Smart Home Security System can remind you about doors or windows that were left open. With highly sensitive detection and tamper-proof smart technology, you'll know when a door or window is opened even slightly, so you can rest assured knowing your home is secure.



Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

Indoor
MotionViewer™
for Smart Home Security

-  Smart Motion Alerts with Video Clips
-  Night Vision
-  Wireless 2-Year Battery Life*

[Buy now](#)

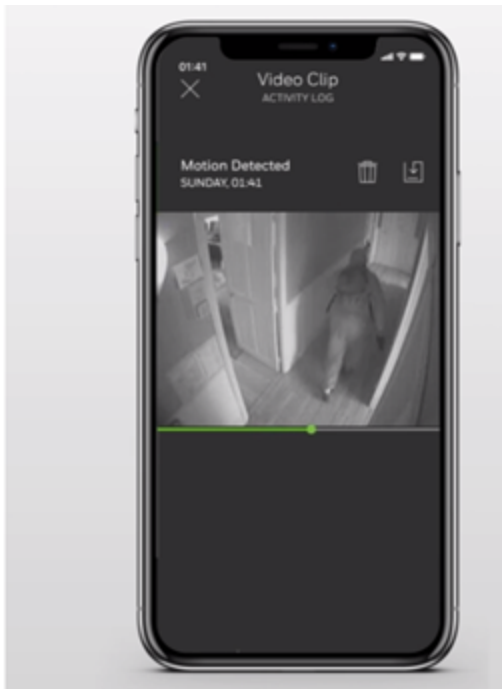
Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



See what's happening at home

No matter where you are, your MotionViewer™ helps you keep an eye on your home and loved ones. It records a ten second video clip in color when motion is detected and sends an alert to view the clip on your smart phone. So you know when the kids are home from school, or even if you have an unwanted visitor.

[Try in app demo](#)



Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



VISTAKEY

Now with 26-bit support!

Honeywell's VISTAKEY Single Door Access Control system is incredibly easy to install and configure. Designed to provide low-cost access control expansion for the popular VISTA-32FB, 128BP, 128FBP, 250BP or 250FBP Integration Ready Control Panels, the state-of-the-art module maximizes security investments by integrating access control, intrusion detection and fire detection into one system. Installation costs are reduced by eliminating the need to install additional wiring, panels and software.

VISTAKEY communicates with the control panel on a standard two-wire V-Plex® polling loop. Access validation time is minimized through Honeywell's patented Global Polling feature and special V-Plex protocol. Installation time is reduced through automatic enrollment and quick-start test functions. All programming can be accomplished locally by a keypad or remotely using Honeywell's Compass Downloader software. Specific system events can be reported to the central station via Honeywell's Contact ID.

Source: <https://www.security.honeywell.com/product-repository/vistakey>

Specifications	Ordering Info	Related
<ul style="list-style-type: none">• Supports 250 to 500 card holders and eight access groups• A maximum of four to 15 doors*• Wires on standard V-Plex polling loop• Supports 26-bit standard HID® format - (H10301)• Three input zones, supervised or unsupervised, can be used for door status monitoring• Request-to-exit monitoring and cabinet monitoring (tamper)• One open collector output trigger (sink 12mA @ 12VDC)• 512 to 1,000* access control events recorded in VISTA event log• Programmable locally from keypad or remotely from Compass Downloader• UL listings: UL294, UL, CUL <p>*Panel dependent HID is a trademark or registered trademark of HID Global Corporation.</p>		

Source: <https://www.security.honeywell.com/product-repository/vistakey>



VISTA-128BPT/VISTA TURBO SERIES


The VISTA-128BPT is a powerful member of the Honeywell family of commercial alarm panels, integrating burglary, CCTV and access control functions. Many features are available that extend the applications of the VISTA-128BPT while simplifying end-user operation. The VISTA-128BPT and VISTA-128BPTSIA are listed for residential burglary, residential fire and commercial burglary applications (see agency listings in this document for more details). They are compatible with a wide range of AlarmNet communications products for alarm reporting, uploading /downloading and remote services.

Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>




Specifications	Ordering Info	Related
<p>Standard features (VISTA-128BPT and VISTA-128BPTSIA):</p> <ul style="list-style-type: none"> • Provides nine style-B hardwired zones • Supports up to 119 additional zones using a built-in polling (V-Plex®, multiplex) loop interface • Supports up to 127 wireless zones using up to two 5800 series wireless receivers (fewer if using hardwire and/or polling loop zones) • Provides one power-limited bell circuit delivering 1.7Amp (max) at 12VDC • Provides the ability to control eight separate partitions independently, each functioning as if it had its own separate control • Accommodates 150 user codes with seven authority levels • Accommodates 32 keypad macro commands per system • Keeps a log of up to 512 events • Supports up to 16 compatible two-wire smoke detectors on zone 1 • Zone 7 may be used for keyswitch arming/disarming • Integrates with WIN-PAK access control systems to provide increased users, event log and scheduling • Supports V-Plex addressable VISTAKEY access control (up to eight doors and 250 cards) • Easily programmed and maintained by Compass Windows-based downloader • Supports up to 96 programmable outputs • Programmable to meet SIA false alarm prevention specifications. To meet UL approval for ANSI/SIA CP-01-2010, order part number V128BF • Supports up to six touchscreen Advanced User Interface (AUI) devices (6272 or later) • Smoke detector reset at keypad • Quick exit • Group bypass • Arm faulted • Event arming • Carbon monoxide (CO) zone type support • Expanded high-speed RS-232 capability for third party interface and automation • Internet upload/download over AlarmNet GSM and/or IP communicators over the panel's keypad (ECP) bus • Ringback support for AlarmNet communicators (confirmation of closing report) • 24-hour dialer test support for AlarmNet devices • Supports V-Plex Smart Contact feature for improved responsiveness on systems with many V-Plex zones • Telco line cut detection 		

Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>

59. The infringing products provide a measurement means to measure the parameter of the circuit. For example, the Smart Home Security System integrates with at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) 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.



Outdoor
MotionViewer™
for Smart Home Security

-  Smart Motion Alerts with Video Clips
-  Night Vision
-  Wireless 2-Year Battery Life*

[Buy now](#)

Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>

More than a motion sensor. Smart detection you can see.

Allow the Outdoor MotionViewer™ to extend your system so that you can keep an eye on the front door, back yard or garage.



Senses Motion, Sends Video

Take awareness outdoors with long-range detection up to 33ft (10m) and a 90° field of view



Alert Night & Day, for 2 Years*

Night vision means it's on watch around the clock, with a 2-year battery*



Pet-Friendly Smart Detection

Small animals (Up to 36kg) won't cause false alarms, so don't worry about your pet, birds or a moving branch triggering the system

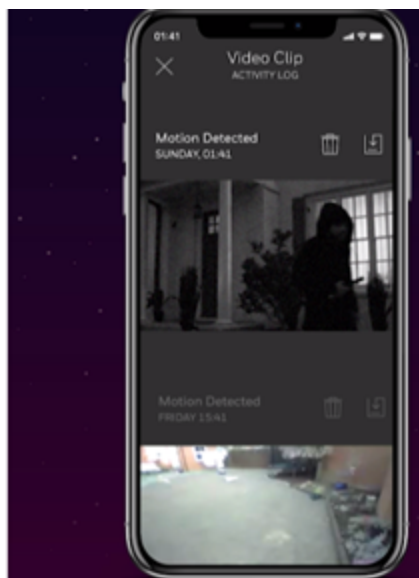
Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>



Alerts Day and Night

The MotionViewer™ is unique: Totally wireless. Battery operated. With night vision and infrared. It's highly weather resistant to let you keep watch day and night for 2 years*. And when it senses motion, you get a video clip – so you can see what's moving outside your home, whether it's the kids arriving home from school or an unwanted visitor.

Try the App Demo



Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>



Deter Intruders & Early Alerts

With intruder deterrence, when the Outdoor MotionViewer™ detects unwanted motion, your Smart Home Security System even plays sounds – like a barking dog – to make your home appear occupied. Even when the system is in Home mode, the Outdoor MotionViewer™ can play a simple alert tone, to let you know someone is approaching.

Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>

– When will Camera Base Station sound an alarm?

Camera Base Station sound an alarm when any of the following has occurred:

- A Motion Sensor or Indoor MotionViewer has picked up on movement within your home when your system is in AWAY mode
- Entry delay has expired after a door with an Access Sensor had been opened and the system was in either AWAY or NIGHT mode
- A window with an Access Sensor was opened when the system was either in NIGHT or AWAY mode
- Exit delay expires after system was switched to AWAY mode, but you didn't leave yet – you might mistakenly set off a Motion Sensor or an Indoor MotionViewer to cause an alarm
- System is in AWAY or NIGHT modes and any of the sensors appears to be tampered with – opening the case of any sensor in these modes will result in an immediate alarm

Any time Camera Base Station sounds an alarm, you can expect to receive an alert on your phone so long as you're in an area with coverage and you've enabled our app to send you notifications. You can see what's happening by looking at the live video feed from Camera Base Station, and take the appropriate action.

Source: https://www.honeywellhome.com/en/smart-home-security-faqs-guides-videos?_ga=2.134341553.1127803632.1552563696-579322085.1552563696#notes

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 Smart Home Security System integrates with Camera Base Station and at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) via a wireless communication network and compares the measured parameter with a threshold value to generate a status signal (such as video recording, 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.

Technical Specifications



Battery

CR123A Lithium

Dimensions (L x W x D)

3.72 x 1.01 x 0.92 inches

94.5 x 25.7 x 23.2 mm

Estimated Battery Life

Up to 4 years based on typical usage

Weight

1.7 oz (48 g)

Connectivity

Wireless Connectivity

Honeywell Secure Wiselink® Protocol

300ft Range, clear line of sight

Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

Technical Specifications

Processor
2GHz Snapdragon 8-core processor

Camera
2MP HD camera with 1080p image sensor
147° field of view
Night vision
Motion detection

Audio
5W omnidirectional speaker
Three-microphone array
90 dB alarm
Two-way audio

Security
Encrypted cloud storage
256-bit AES encryption on device
Secure web transfer (SSL/TLS)

Connectivity
802.11 Wi-Fi a/b/g/n/ac
Dual-band 2.4 / 5 GHz
Bluetooth 4.2
Z-Wave Plus™ control
Honeywell Wiselink Security Protocol

Capacity
8 GB Flash
1 GB RAM



Source: <https://smarthomesecurity.honeywellhome.com/>

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 Smart Home Security System comprises a communication module (“transmission means”) for at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) to transmit the status signal (such as video recording, alert,

notification and/or alarm) via a wireless network (such as Wi-Fi, Z-Wave and/or Honeywell Secure Wiselink Protocol) to a Camera Base Station and/or a mobile computing device (“display”). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Technical Specifications



<p>Camera 90° field of view</p> <p>Resolution QVGA (320x240)</p> <p>Video Format 10 second colour video clip H.264 @ 10 fps</p> <p>Battery 3 CR123A Lithium</p> <p>Estimated Battery Life Up to 2 years based on typical usage</p> <p>Connectivity Wireless Connectivity Honeywell Secure Wiselink® Protocol 300ft Range, clear line of sight</p>	<p>Detection Distance Up to 23 ft (7m)</p> <p>Dimensions (L x W x D) 4.95 x 2.0 x 1.82 inches 125.7 x 50.8 x 46.2 mm</p> <p>Weight With sliding plate 5.82 oz (165 g) With desk mount 6.35 oz (180 g)</p> <p>Size (H x W x D) 4.92 x 2.05 x 1.81 inches (125 x 52.1 x 46 mm)</p> <p>Box Includes Outdoor MotionViewer™ Wall bracket 4 Fixing screws for wall bracket 3 CR123A lithium batteries Quick-start guide</p>
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Source: <https://smarthomesecurity.honeywellhome.com/outdoor-motionviewer/>

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 Smart Home Security System comprises Camera Base Station (“a display”) to display an indication (such as alarm, LED light) of at least one of the coupled sensor based on the signal assigned status. Further, the Smart Home Security System also provides a mobile application (“Honeywell Home”) to display an indication (such as video recording, alarm, notification and/or alerts) of at least one of the coupled sensors (such as Wi-Fi, Z-Wave and/or Honeywell Secure Wiselink Protocol) 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 Security Alarm Control panels (such as Single Door Access Control System, V-Plex Single-Door Access Control Module, Commercial Fire and Partitioned Burglary Alarm Control Panel) and Smart Home Security System including Camera Base Station, Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob (“Apparatus”) 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.

Smart Home Security

-  **All-in-One Do-it-Yourself Home Security**
Simple to set up and use, it can change modes automatically as you come and go.
-  **Senses Motion & Sound, Captures & Sends HD Video**
Stays alert day or night with smart motion detection and night vision all recorded in crisp 1080p HD video, with full audio.
-  **Scheduled Facial Recognition***
Can recognize familiar faces to notify you if they arrive home when expected. If it sees someone it doesn't know, you'll get an alert on your phone to see a video clip of who's there.
-  **Amazon Alexa & Voice Control Built In**
Change modes with your voice, and talk to built-in Amazon Alexa to check the weather, ask questions, control other devices, and more.
-  **Smart Home Integration**
It's easy to connect compatible smart devices and services. When used with Outdoor MotionViewers™ your system can even use sounds and Z-Wave lights to deter intruders.



Source: <https://smarthomesecurity.honeywellhome.com/>

Extend your system with accessories



Indoor Motion Sensor
[Find out more](#)



Indoor Access Sensor
[Find out more](#)



Indoor MotionViewer™
[Find out more](#)



Outdoor MotionViewer™
[Find out more](#)



Key Fob
[Find out more](#)

Source: <https://smarthomesecurity.honeywellhome.com/#accessories>



Accessories

Indoor MotionViewer™ **Outdoor MotionViewer™** Motion Sensor Access Sensor Key Fob

Outdoor MotionViewer™

- Intelligent motion detection with video capture
- Outdoor discrete weather resistant design
- Totally wireless
- Battery powered - lasts up to 2 years

Watch the video



Source: <https://smarthomesecurity.honeywellhome.com/>

Get alerted when you leave a window or door open

Access Sensors are easy to install and extend your system so you're notified if any of your doors or windows are opened unexpectedly.



Alerts Night and Day, for 4 years*

The battery lasts up to 4 years so you rarely have to worry about changing it



Highly Sensitive Detection

Detects movement of less than an inch so you know when a window or door is open even slightly



Wireless Easy Installation

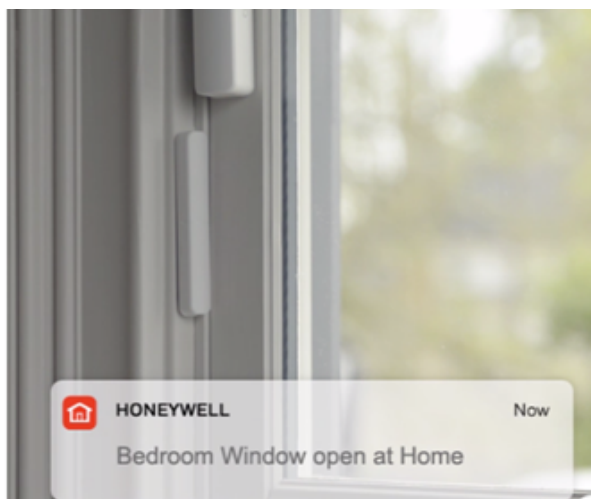
No screws or wires, just simple and fast installation

Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>






Smart Alerts

When you leave home, your Smart Home Security System can remind you about doors or windows that were left open. With highly sensitive detection and tamper-proof smart technology, you'll know when a door or window is opened even slightly, so you can rest assured knowing your home is secure.



Source: <https://smarthomesecurity.honeywellhome.com/access-sensor/>

Indoor
MotionViewer™
for Smart Home Security

-  Smart Motion Alerts with Video Clips
-  Night Vision
-  Wireless 2-Year Battery Life*

[Buy now](#)

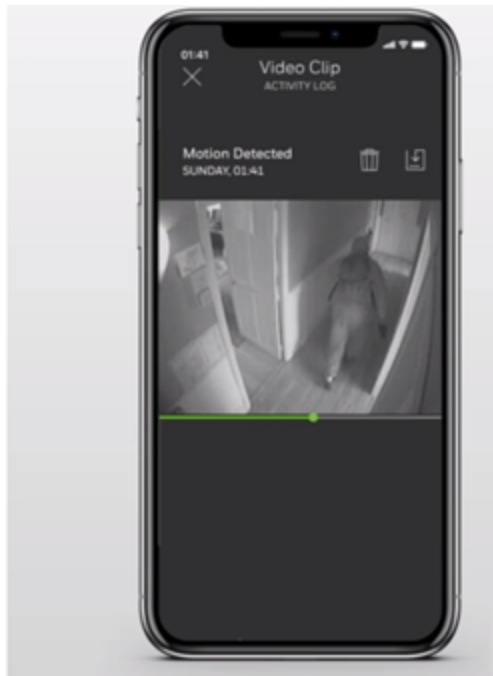
Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



See what's happening at home

No matter where you are, your MotionViewer™ helps you keep an eye on your home and loved ones. It records a ten second video clip in color when motion is detected and sends an alert to view the clip on your smart phone. So you know when the kids are home from school, or even if you have an unwanted visitor.

[Try in app demo](#)



Source: <https://smarthomesecurity.honeywellhome.com/indoor-motionviewer/>



VISTAKEY

Now with 26-bit support!

Honeywell's VISTAKEY Single Door Access Control system is incredibly easy to install and configure. Designed to provide low-cost access control expansion for the popular VISTA-32FB, 128BP, 128FBP, 250BP or 250FBP Integration Ready Control Panels, the state-of-the-art module maximizes security investments by integrating access control, intrusion detection and fire detection into one system. Installation costs are reduced by eliminating the need to install additional wiring, panels and software.

VISTAKEY communicates with the control panel on a standard two-wire V-Plex® polling loop. Access validation time is minimized through Honeywell's patented Global Polling feature and special V-Plex protocol. Installation time is reduced through automatic enrollment and quick-start test functions. All programming can be accomplished locally by a keypad or remotely using Honeywell's Compass Downloader software. Specific system events can be reported to the central station via Honeywell's Contact ID.

Source: <https://www.security.honeywell.com/product-repository/vistakey>

Specifications	Ordering Info	Related
<ul style="list-style-type: none"> Supports 250 to 500 card holders and eight access groups A maximum of four to 15 doors* Wires on standard V-Plex polling loop Supports 26-bit standard HID® format - (H10301) Three input zones, supervised or unsupervised, can be used for door status monitoring Request-to-exit monitoring and cabinet monitoring (tamper) One open collector output trigger (sink 12mA @ 12VDC) 512 to 1,000* access control events recorded in VISTA event log Programmable locally from keypad or remotely from Compass Downloader UL listings: UL294, UL, CUL <p>*Panel dependent</p> <p>HID is a trademark or registered trademark of HID Global Corporation.</p>		

Source: <https://www.security.honeywell.com/product-repository/vistakey>



VISTA-128BPT/VISTA TURBO SERIES

The VISTA-128BPT is a powerful member of the Honeywell family of commercial alarm panels, integrating burglary, CCTV and access control functions. Many features are available that extend the applications of the VISTA-128BPT while simplifying end-user operation. The VISTA-128BPT and VISTA-128BPTSIA are listed for residential burglary, residential fire and commercial burglary applications (see agency listings in this document for more details). They are compatible with a wide range of AlarmNet communications products for alarm reporting, uploading /downloading and remote services.

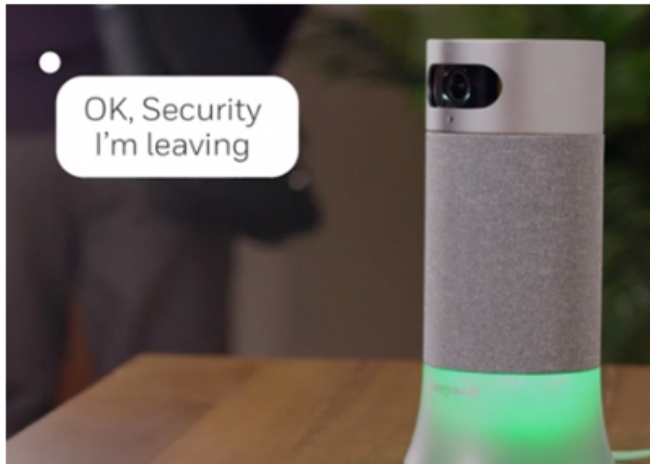
Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>

Specifications	Ordering Info	Related
<p>Standard features (VISTA-128BPT and VISTA-128BPTSIA):</p> <ul style="list-style-type: none"> • Provides nine style-B hardwired zones • Supports up to 119 additional zones using a built-in polling (V-Plex®, multiplex) loop interface • Supports up to 127 wireless zones using up to two 5800 series wireless receivers (fewer if using hardware and/or polling loop zones) • Provides one power-limited bell circuit delivering 1.7Amp (max) at 12VDC • Provides the ability to control eight separate partitions independently, each functioning as if it had its own separate control • Accommodates 150 user codes with seven authority levels • Accommodates 32 keypad macro commands per system • Keeps a log of up to 512 events • Supports up to 16 compatible two-wire smoke detectors on zone 1 • Zone 7 may be used for keyswitch arming/disarming • Integrates with WIN-PAK access control systems to provide increased users, event log and scheduling • Supports V-Plex addressable VISTAKEY access control (up to eight doors and 250 cards) • Easily programmed and maintained by Compass Windows-based downloader • Supports up to 96 programmable outputs • Programmable to meet SIA false alarm prevention specifications. To meet UL approval for ANSI/SIA CP-01-2010, order part number V128BPTSIA • Supports up to six touchscreen Advanced User Interface (AUI) devices (6272 or later) • Smoke detector reset at keypad • Quick exit • Group bypass • Arm faulted • Event arming • Carbon monoxide (CO) zone type support • Expanded high-speed RS-232 capability for third party interface and automation • Internet upload/download over AlarmNet GSM and/or IP communicators over the panel's keypad (ECP) bus • Ringback support for AlarmNet communicators (confirmation of closing report) • 24-hour dialer test support for AlarmNet devices • Supports V-Plex Smart Contact feature for improved responsiveness on systems with many V-Plex zones • Telco line cut detection 		

Source: <https://www.security.honeywell.com/product-repository/vista-128bpt-vista-turbo-series>

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 Smart Home Security System including Camera Base Station, Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob comprises of one or more processors, each having a memory and an input (such as motion and/or access) 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 Smart Home Security System also comprises software to configure one or more processors and integrate with a mobile computing device to generate video recordings, alerts, notifications and/or alarms via a mobile app “Honeywell Home”. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



Security you control with your voice

Change your system's mode with simple voice commands. Or ask built-in Amazon Alexa to switch on a lamp, turn up the thermostat, or dim the lights – without lifting a finger.

Source: <https://smarthomesecurity.honeywellhome.com/>

Technical Specifications

Processor
2GHz Snapdragon 8-core processor

Camera
2MP HD camera with 1080p image sensor
147° field of view
Night vision
Motion detection

Audio
5W omnidirectional speaker
Three-microphone array
90 dB alarm
Two-way audio

Security
Encrypted cloud storage
256-bit AES encryption on device
Secure web transfer (SSL/TLS)

Connectivity
802.11 Wi-Fi a/b/g/n/ac
Dual-band 2.4 / 5 GHz
Bluetooth 4.2
Z-Wave Plus™ control
Honeywell Wiselink Security Protocol

Capacity
8 GB Flash
1 GB RAM



Source: <https://smarthomesecurity.honeywellhome.com/>

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 Smart Home Security System comprises a comparison module that integrates

Camera Base Station and at least one of the sensor (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) 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 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 and/or alarm)) 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 Smart Home Security System comprising Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob 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 Smart Home Security System integrates with Camera Base Station and at least one of the sensors (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) via a wireless communication network which is configured to generate a status signal (such as motion and/or alarm) 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 Smart Home Security System comprises a communication module (“transmitter”) for at least one of the sensor (such as Indoor Motion Sensor, Indoor Access Sensor, Indoor MotionViewer, Outdoor MotionViewer and Key Fob) to a Camera Base Station (“centralized system”) via a wireless network (such as Wi-Fi, Z-Wave and/or Honeywell Secure Wiselink Protocol). Further, the Camera Base Station displays an indication via an alarm or a LED light indication. Also, the Camera Base Station transmits a display indication (such as video recording, alarm, notification and/or alerts) of status signal to a mobile computing device via a mobile application “Honeywell Home.” 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 6, 2019

Respectfully submitted,

/s/

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