IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF DELAWARE

SMART LOCKING TECHNOLOGIES LLC	)
	)
Plaintiff,	)
	) Civil Action No. _____
v.	)
	) **JURY TRIAL DEMANDED**
SCHLAGE LOCK COMPANY LLC	)
	)
Defendant.	)
	)

COMPLAINT

For its Complaint, Plaintiff Smart Locking Technologies LLC ("Smart Locking Technologies"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Smart Locking Technologies is a Delaware limited liability company with a place of business located at 3511 Silverside Road, Suite 105, Wilmington, Delaware 19810.

2. Defendant Schlage Lock Company LLC is a Delaware company, with upon information and belief, a place of business located at 2119 East Kansas City Road, Olathe, Kansas 66061.

JURISDICTION AND VENUE

3. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

5. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in

this district.

6. Venue is proper in this district pursuant to 28 U.S.C. § 1400(b).

THE PATENTS-IN-SUIT

7. On February 24, 2014, U.S. Patent No. 6,696,918 (the "'918 patent"), entitled "Locking Mechanism for Use with Non-Permanent Access Code," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '918 patent is attached hereto as Exhibit A.

8. On October 9, 2001, U.S. Patent No. 6,300,873 (the "'873 patent"), entitled "Locking Mechanism for Use with One-Time Access Code," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '873 patent is attached hereto as Exhibit B.

9. Smart Locking Technologies is the assignee and owner of the right, title and interest in and to the '918 and '873 patents, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,696,918

10. Smart Locking Technologies repeats and realleges the allegations of paragraphs 1 through 9 as if fully set forth herein.

11. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of at least claim 32 of the '918 patent by making, using, importing, offering for sale, and/or selling systems and methods for operating a mobile communication device associated with a user, including, but not limited to, Schlage Encode WiFi Deadbolt ("Encode"), because each and every element is met either literally or equivalently.

12. Upon information and belief, Defendant used Encode via its internal use and testing in the United States, directly infringing one or more claims of the '918 patent.

13. For example, to create its video "Schlage Encode™ Smart Deadbolt Overview" (available at https://youtu.be/zQWNRDI1DRk), Defendant used Encode.

14. More specifically, Encode is a locking mechanism.

Schlage **Encode**™
Smart WiFi Deadbolt

The revolutionary Schlage Encode™ Smart WiFi Deadbolt connects to your home from anywhere with built-in WiFi. Pair with either the Schlage Home app or the Key by Amazon app to grant access to trusted friends and family with customized access codes, and know when your lock has been accessed. It's total control and peace of mind at your fingertips.

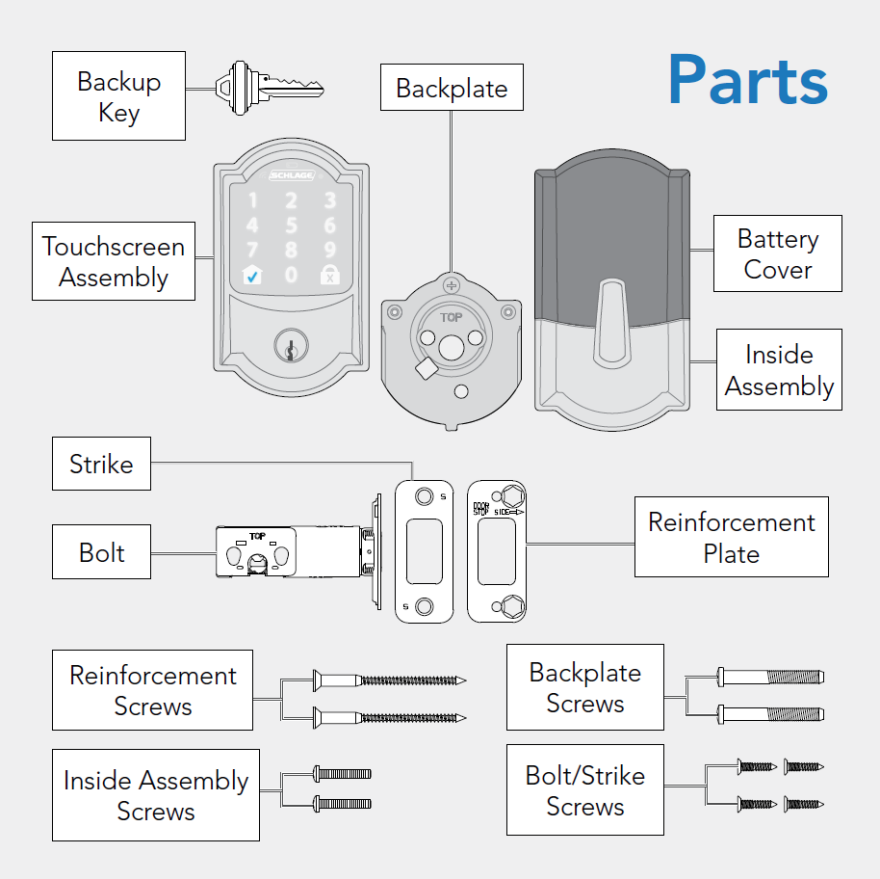
VIEW SCHLAGE ENCODE™ LOCK →

Find a Retailer

https://www.schlage.com/en/home/smart-locks/encode.html.

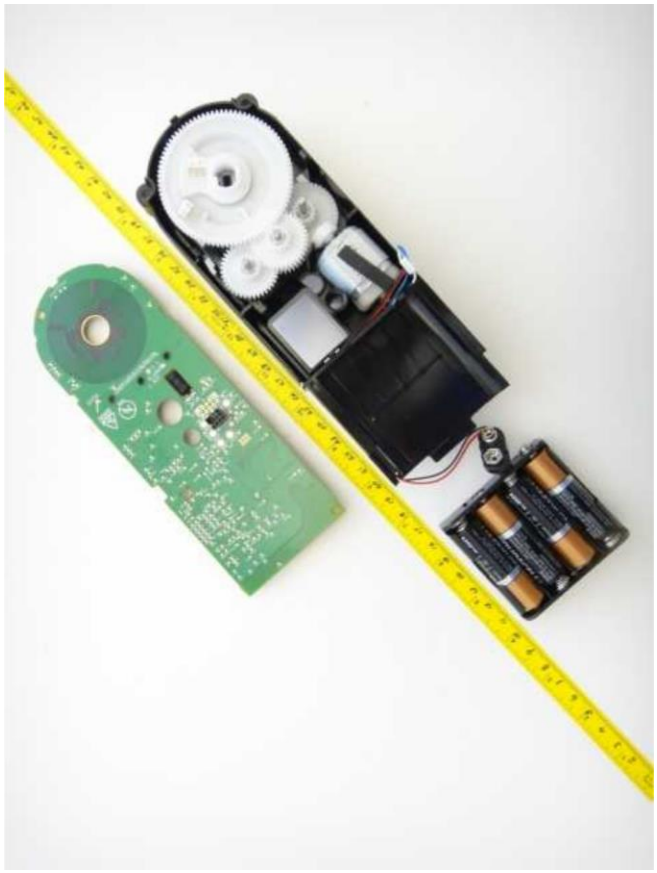
- Built-in WiFi allows you to lock/unlock from anywhere, plus set up guest access codes for recurring, temporary or permanent access when paired with the Schlage Home app or Key by Amazon app, no additional accessories required.
- For additional convenience, enjoy voice commands via Alexa or Google Assistant.
- Create and manage up to 100 access codes for trusted friends and family to use with the fingerprint-resistant, capacitive touchscreen with easy one-touch locking

https://www.schlage.com/en/home/products/BE489WBCENFFF.html.



Schlage Encode Quick Start Guide at p. 2 of 16 ("Quick Start Guide") (available https://www.schlage.com/content/dam/sch-us/documents/pdf/installation-manuals/schlage-encode-quick-start-guide.pdf).

15. Encode includes an actuator configured to unlock in response to entry of an authorized access code.



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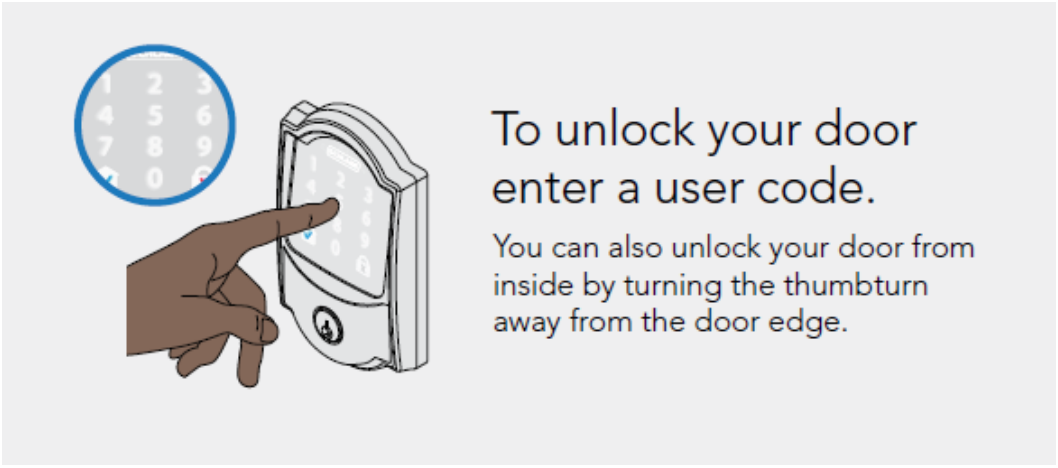


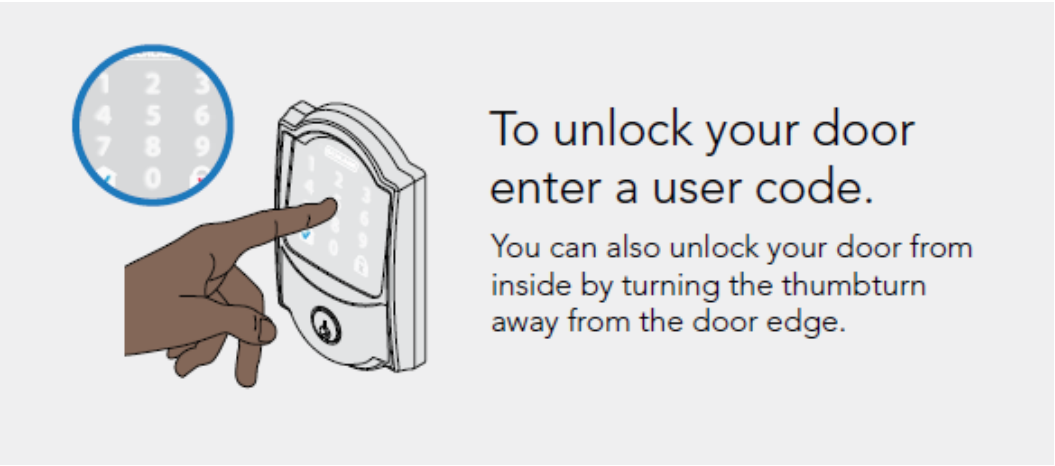
Quick Start Guide at p. 15 of 16.

https://www.digitaltrends.com/smart-home-reviews/schlage-encode-review/#/3.

https://icdn4.digitaltrends.com/image/schlage-encode-smart-lock-review-5-1500x1000.jpg.

16. Encode includes an access code entry unit configured to accept a non-permanent use access code issued by a remote server.

https://www.schlage.com/en/home/smart-locks/encode.html.



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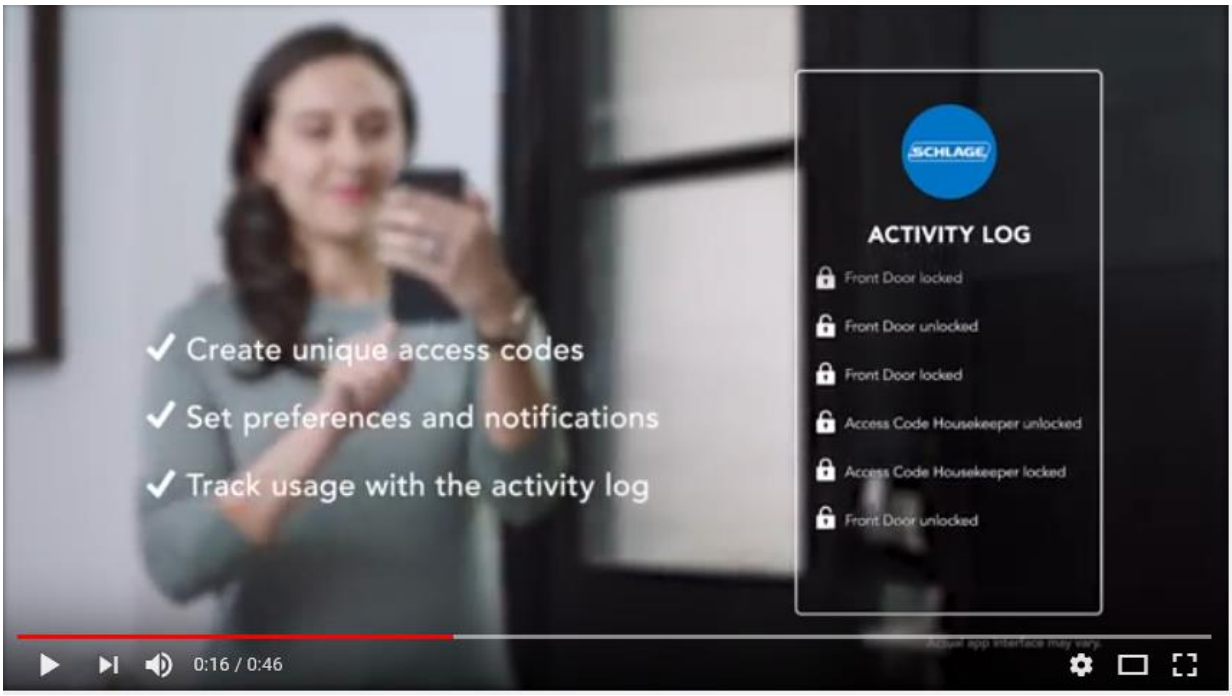

https://youtu.be/ebTmGJz6Kcc?t=16.

How to use a virtual key

With Schlage's app-enabled products like the Schlage Encode and Schlage Sense smart deadbolts, homeowners can share a virtual key with guest or admin privileges.

If you have received a link for a virtual key:

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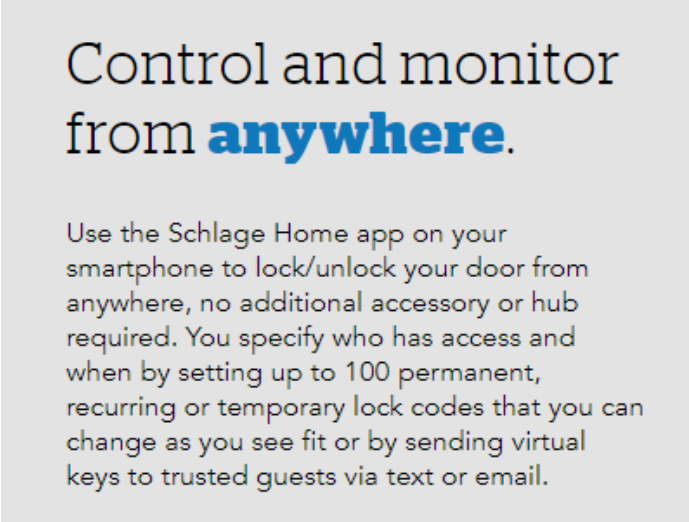
- The virtual key URL will expire after 24 hours or as soon as it has been activated.
- Once you activate the virtual key, the Schlage app will give you privileges to control the lock. If you don't have the Schlage app or a Schlage account, tap on the virtual key link and follow the steps provided.

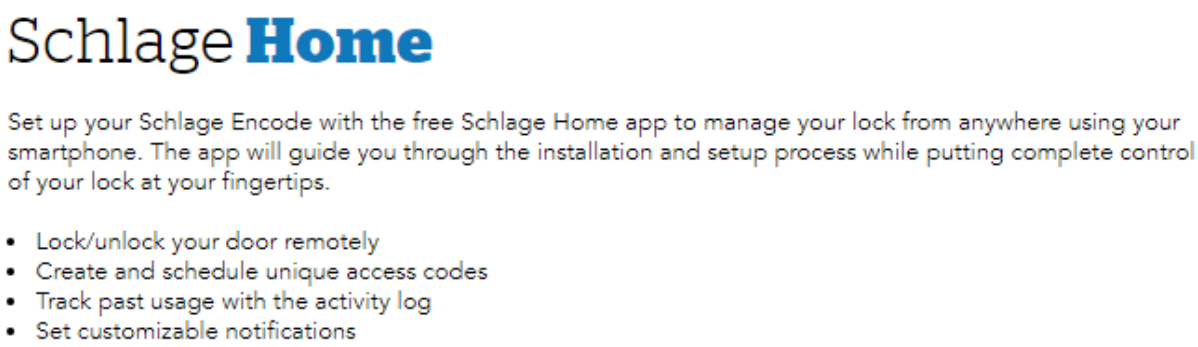
TIP: For guests who would rather not download an app, creating an access code is another way to share access. Access code users can lock and unlock the door using the smart lock's touchscreen.

For more help programming and using your Schlage Sense™ Smart Deadbolt, visit the Schlage Sense FAQ page here.

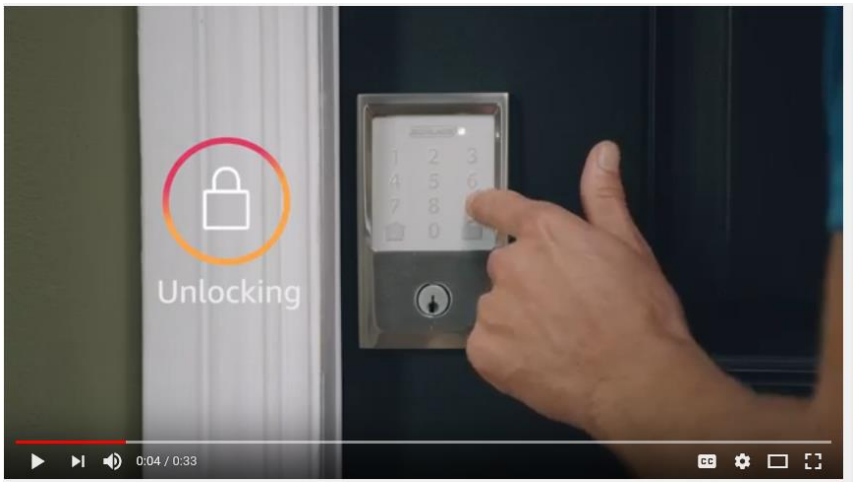
https://www.schlage.com/en/home/faq.html?id=131743.



https://www.schlage.com/en/home/smart-locks/encode.html



https://www.schlage.com/en/home/support/encode-works-with.html.



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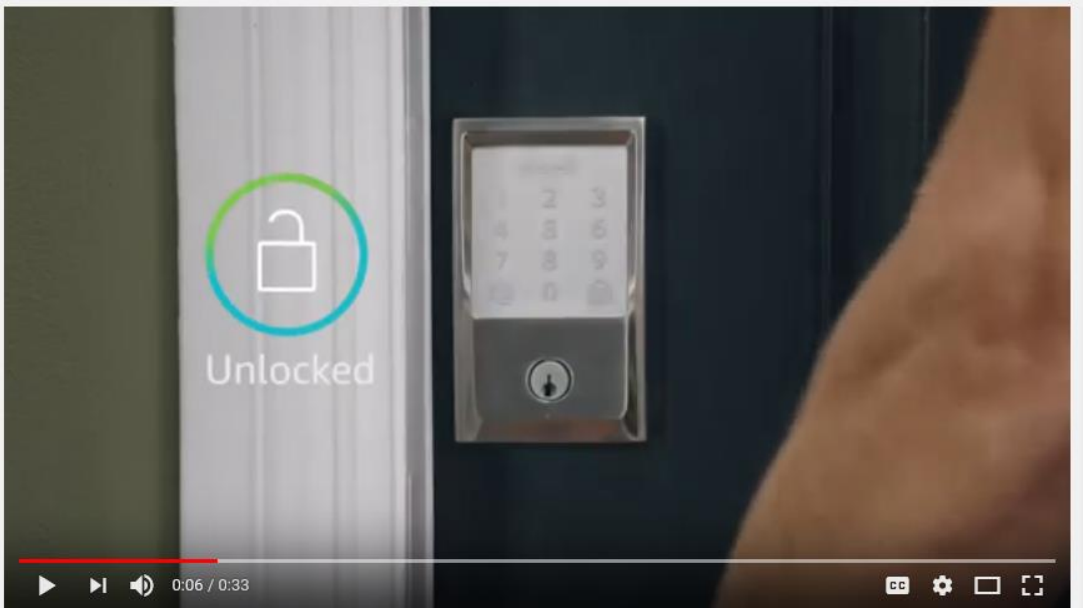

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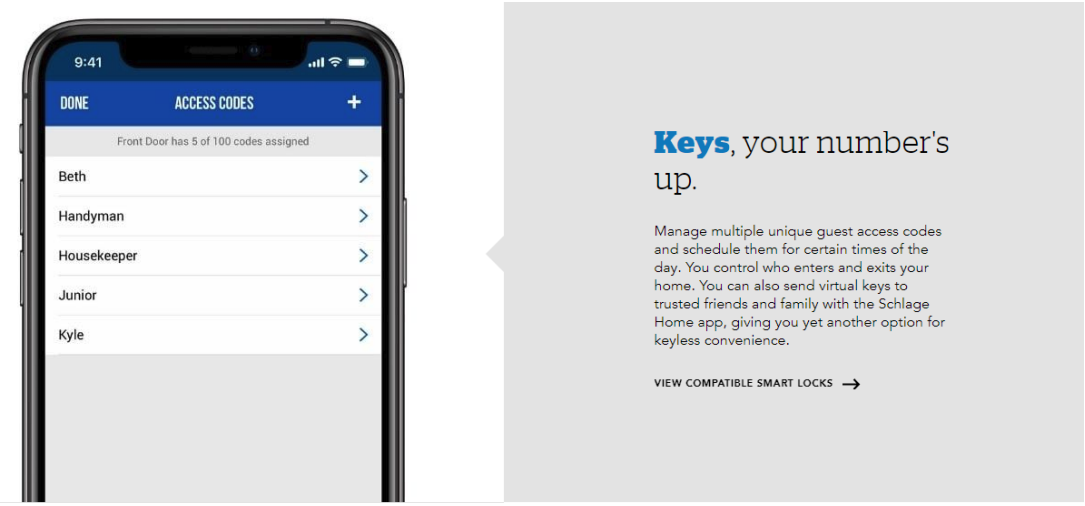


https://www.schlage.com/en/home/smart-locks/schlage-app.html.

Schlage Encode™ Smart WiFi Deadbolt access code schedules (BE489)

You can use the Schlage Home app to schedule access codes that work only at specific times. Codes can be scheduled to grant access for:

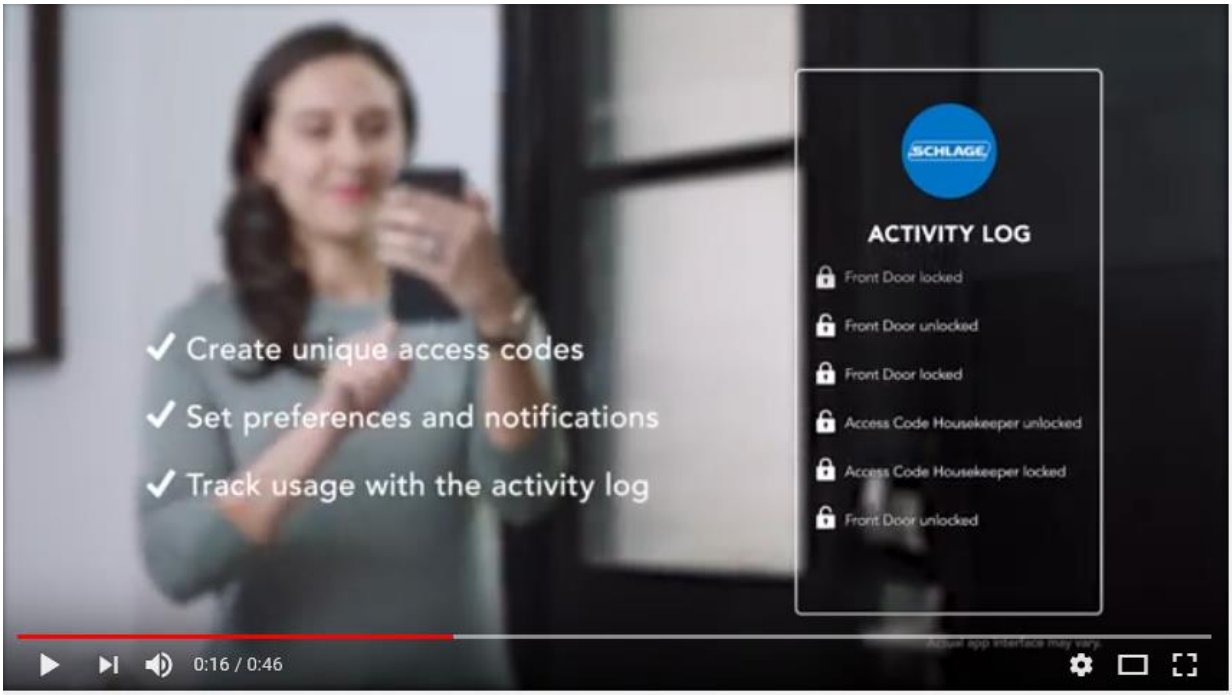
- a single day
- certain times of the day on a recurring basis, such as every day from 8-11 a.m
- certain days of the week on a recurring basis, such as every Wednesday
- a certain period of time, such as for the next three weeks or today only from 2-4 p.m

Popular uses for scheduled access codes include granting access to a house cleaner only on the days and times they are expected or allowing a contractor entry for the few weeks a home improvement job is expected to last. You may also schedule a one-time code that enables a trusted friend to drop off your kids.

For more help programming and using your Schlage Encode lock, visit the Schlage Encode FAQ page.

https://www.schlage.com/en/home/faq.html?id=131954.

17. The access code includes identification information to indicate who accessed the locking mechanism.



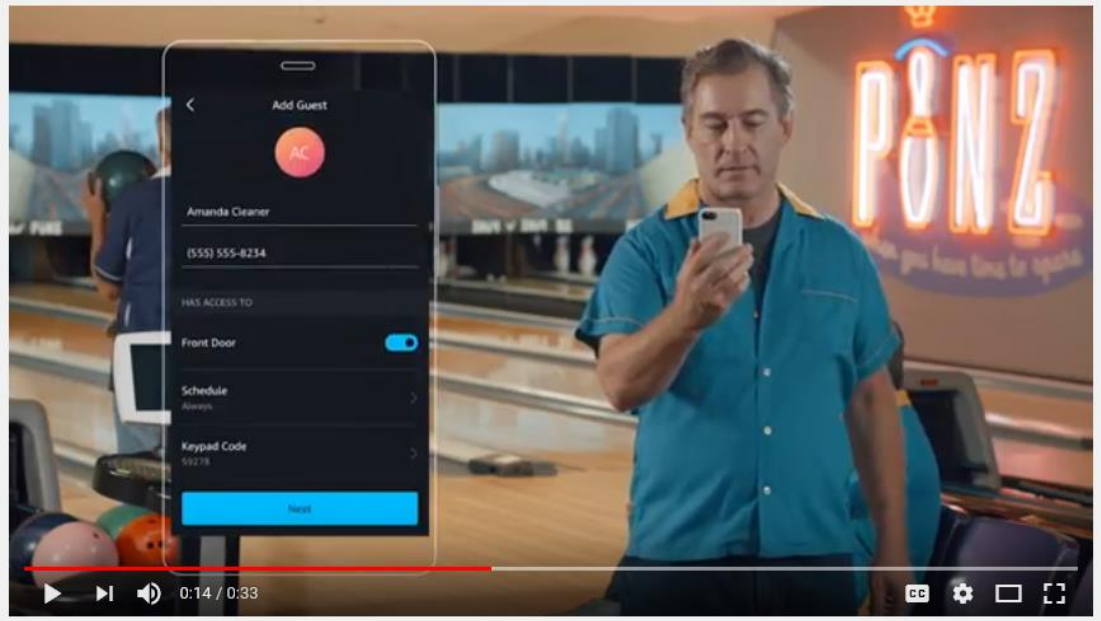
https://youtu.be/ebTmGJz6Kcc?t=16.

Schlage **Home**

Set up your Schlage Encode with the free Schlage Home app to manage your lock from anywhere using your smartphone. The app will guide you through the installation and setup process while putting complete control of your lock at your fingertips.

- Lock/unlock your door remotely
- Create and schedule unique access codes
- Track past usage with the activity log
- Set customizable notifications

https://www.schlage.com/en/home/support/encode-works-with.html.



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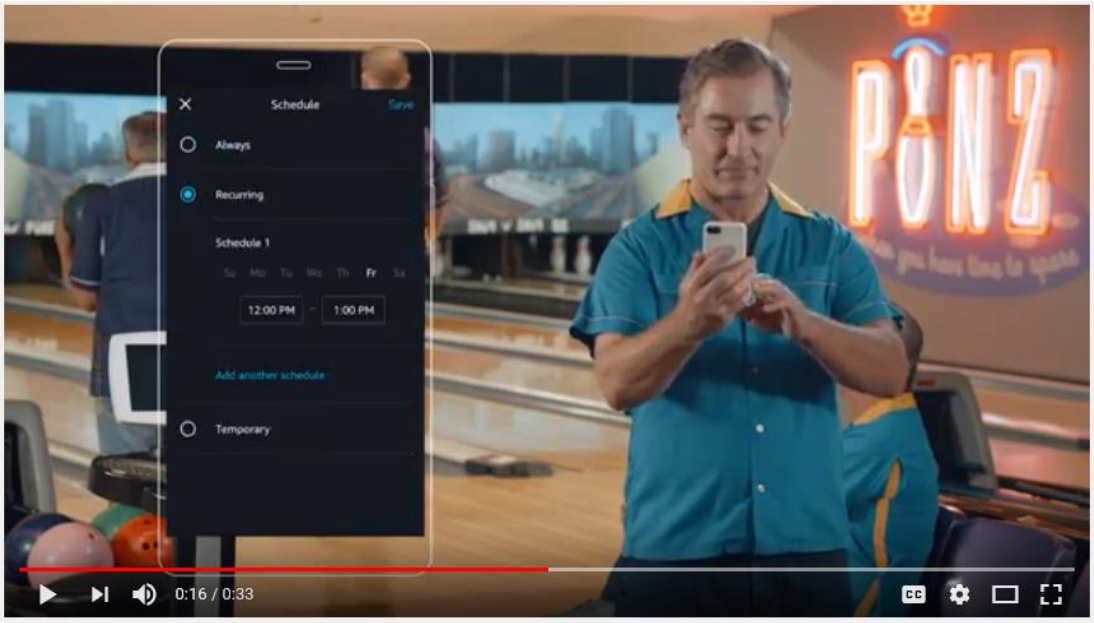
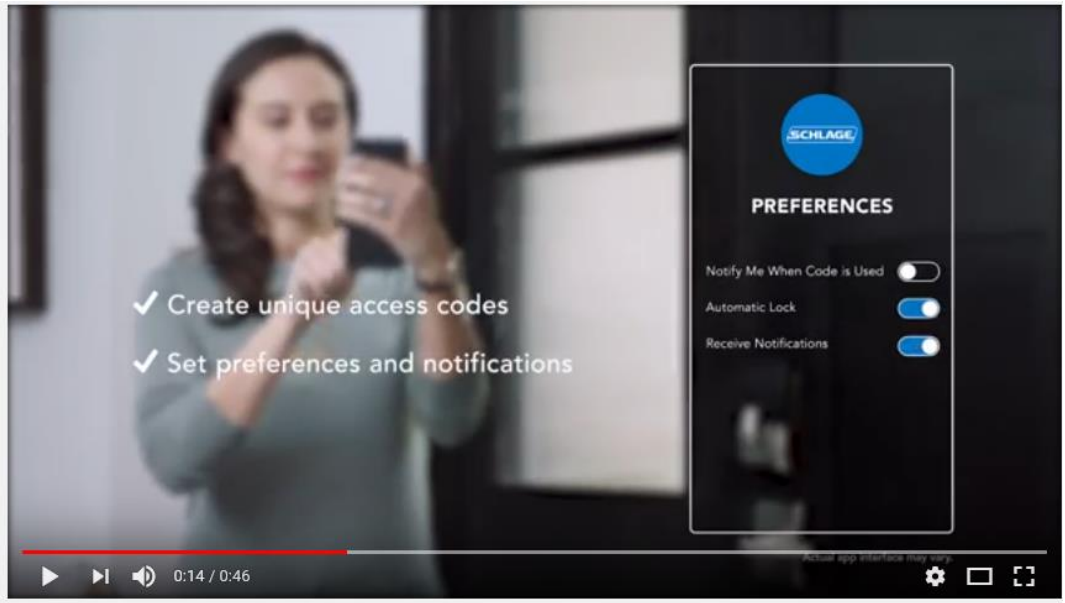


https://youtu.be/js8DLXmo37Y?t=16.

18. Encode includes a locking mechanism controller programmed to transmit a message to a server and/or user indicating a non-permanent use access code has been accepted.



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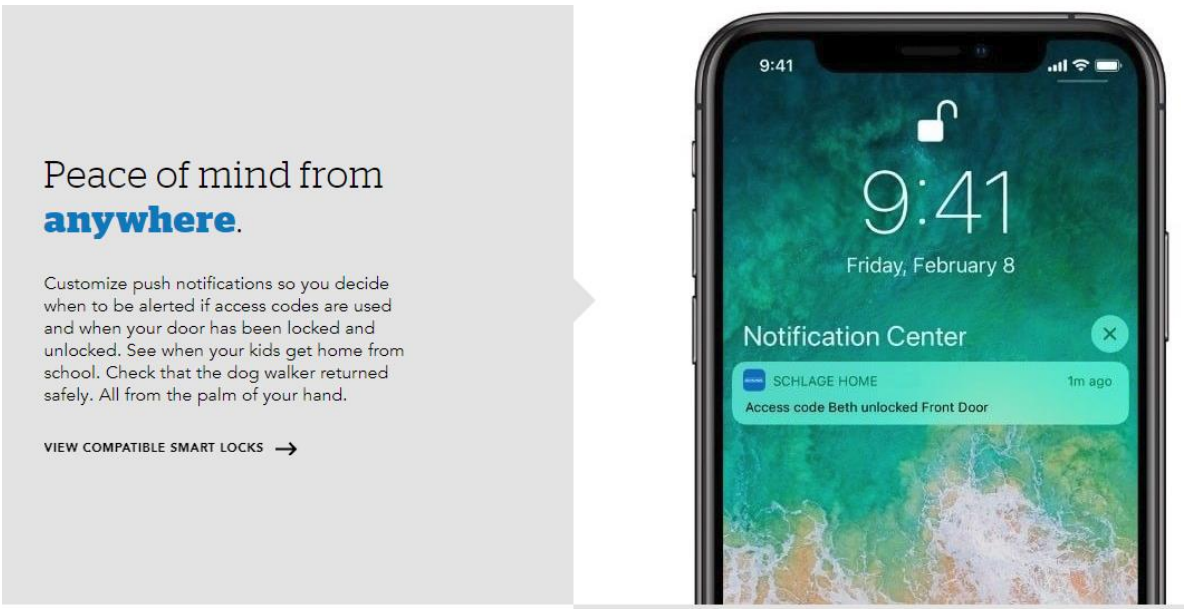

https://www.schlage.com/en/home/smart-locks/schlage-app.html.

https://play.google.com/store/apps/details?id=com.allegion.leopard&hl=en_IN.

> Up to 100 access codes for friends and guests can be easily allocated from the app. You can choose to activate these codes on a recurring schedule or alternatively, for a specified time period. Once configured, a Share button pops up, allowing you to send out the code via your preferred channel. Again, you can choose to be notified when a guest access code is used, while a comprehensive access log provides a detailed history of lock usage.

https://www.digitaltrends.com/smart-home-reviews/schlage-encode-review/.

19. Smart Locking Technologies is entitled to recover from Defendant the damages sustained by Smart Locking Technologies as a result of Defendant's infringement of the '918 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 6,300,873

20. Smart Locking Technologies repeats and realleges the allegations of paragraphs 1 through 19 as if fully set forth herein.

21. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of at least claim 36 of the '873 patent by making, using, importing, offering for sale, and/or selling systems and methods for operating a mobile communication device associated with a user, including, but not limited to, Schlage Encode WiFi Deadbolt ("Encode"), because each and every element is met either literally or equivalently.

22. Upon information and belief, Defendant used Encode via its internal use and testing in the United States, directly infringing one or more claims of the '918 patent.

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VIEW SCHLAGE ENCODE™ LOCK →

Find a Retailer

https://www.schlage.com/en/home/smart-locks/encode.html.

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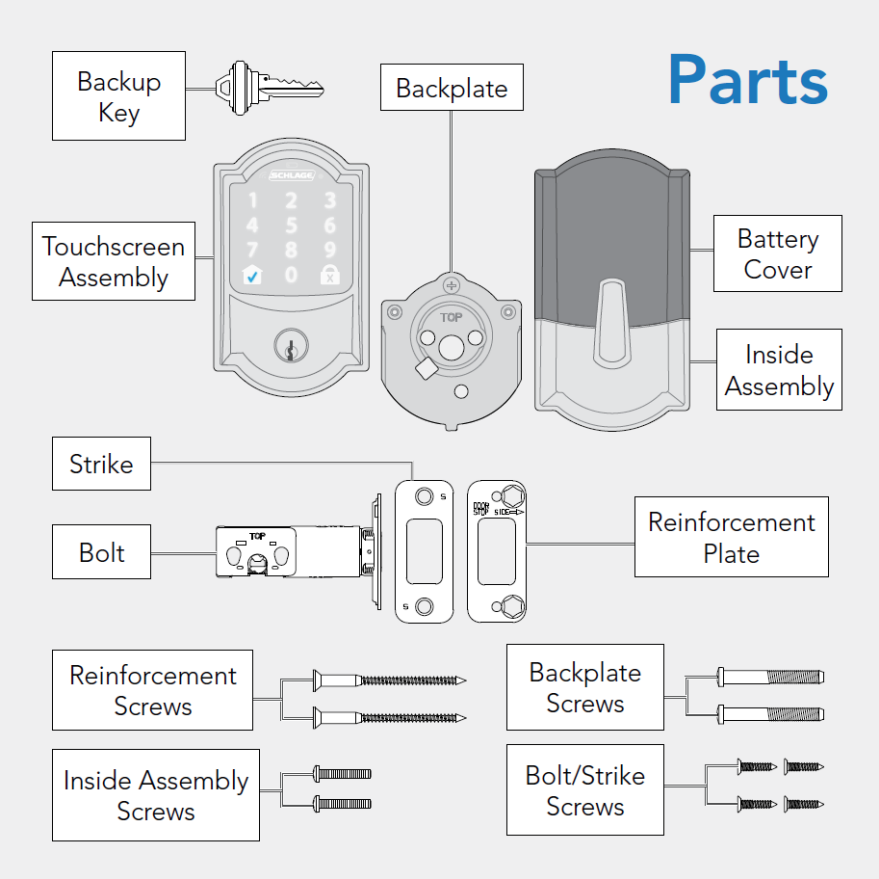
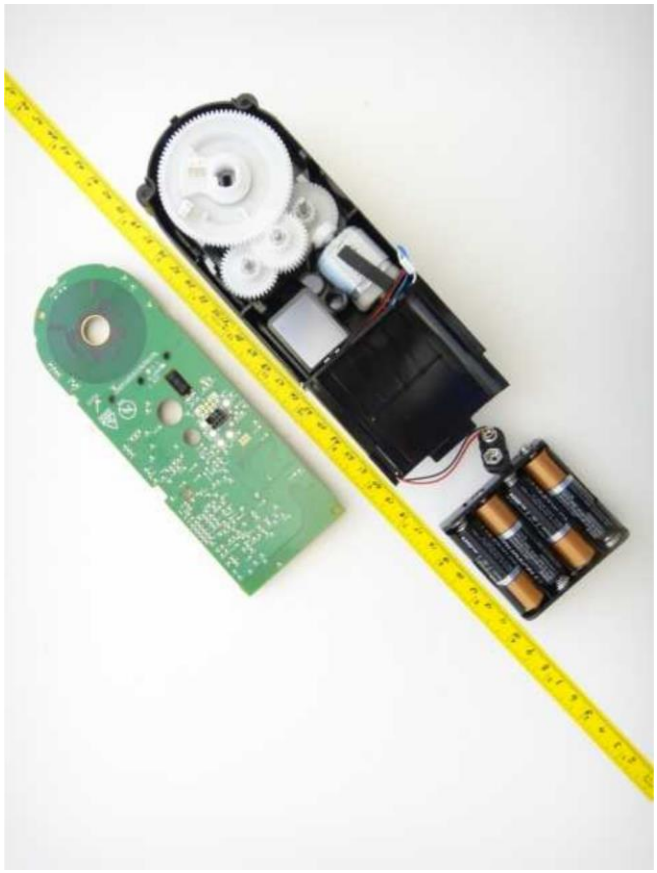
https://www.schlage.com/en/home/products/BE489WBCENFFF.html.



Quick Start Guide at p. 2 of 16.

25. Encode includes an actuator configured to unlock in response to entry of an authorized access code.



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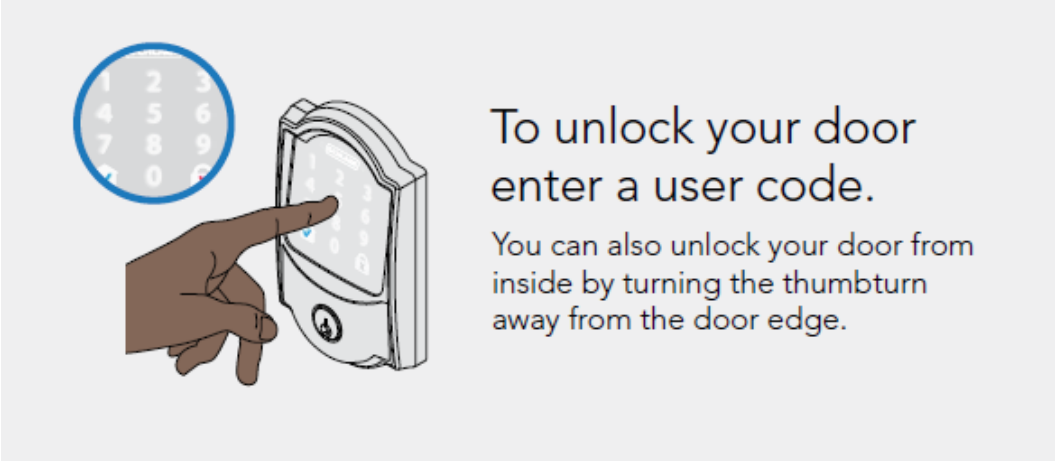

Quick Start Guide at p. 15 of 16.

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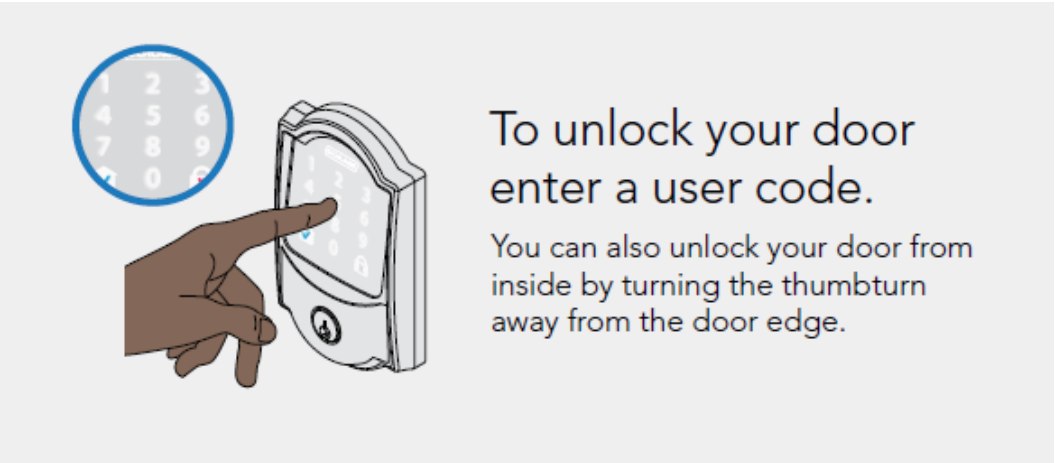
https://icdn4.digitaltrends.com/image/schlage-encode-smart-lock-review-5-1500x1000.jpg.

26. Encode includes an access code entry unit configured to accept a one-time use access-code issued by a remote server.

https://www.schlage.com/en/home/smart-locks/encode.html.



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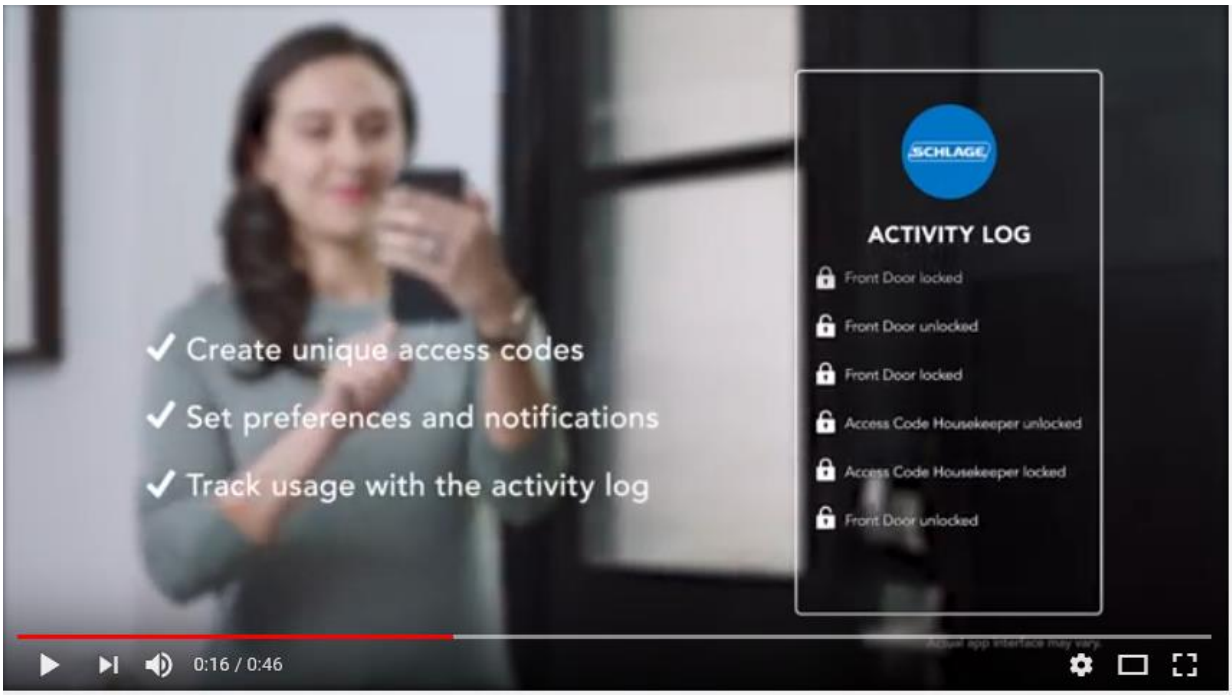

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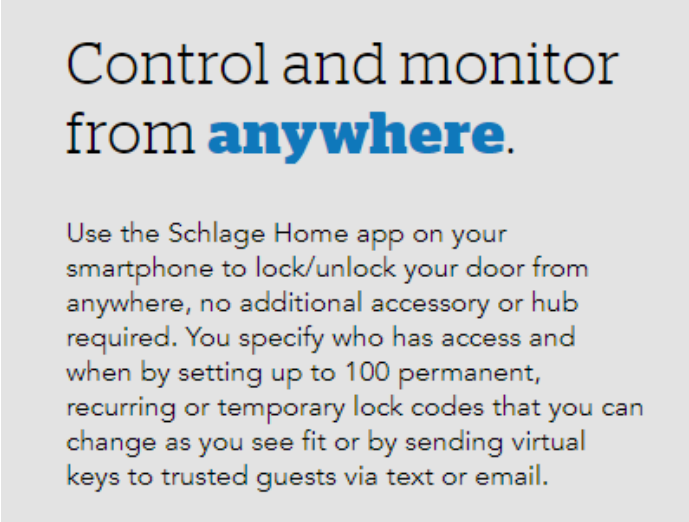

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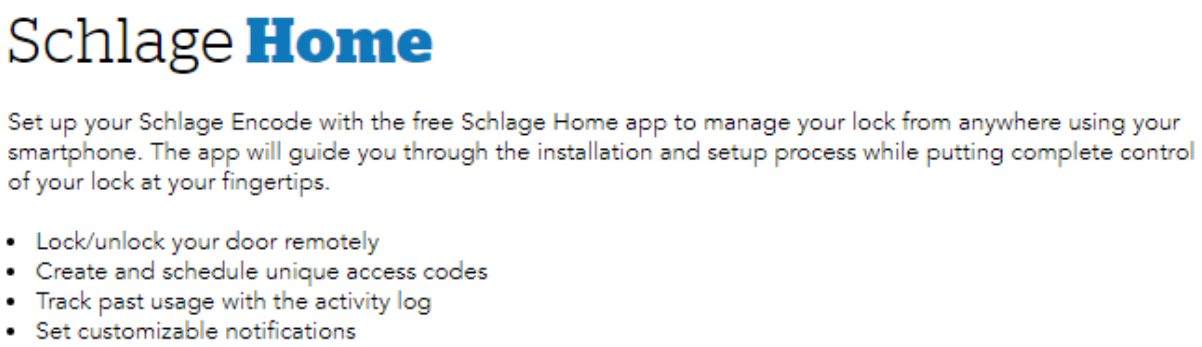

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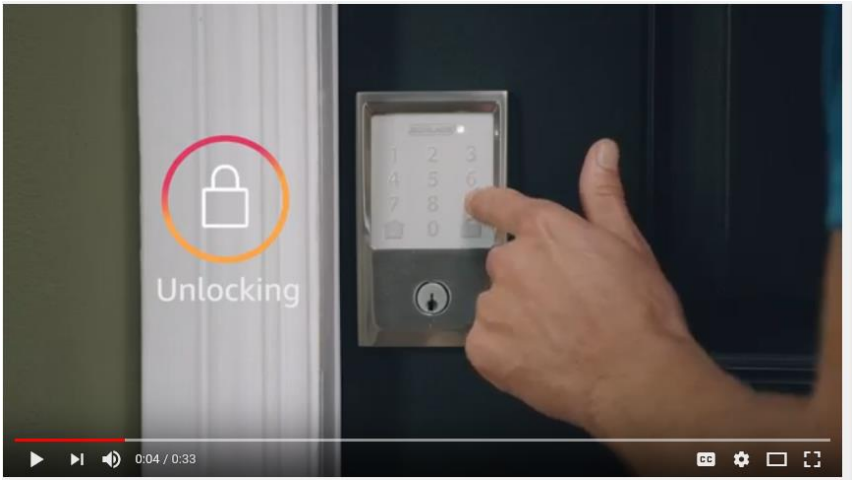

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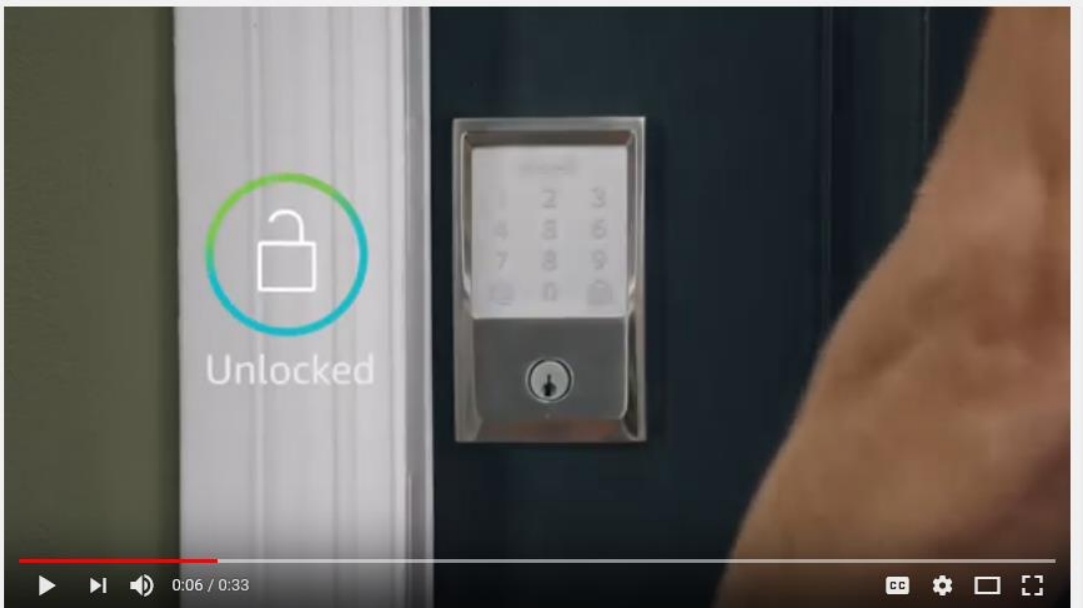

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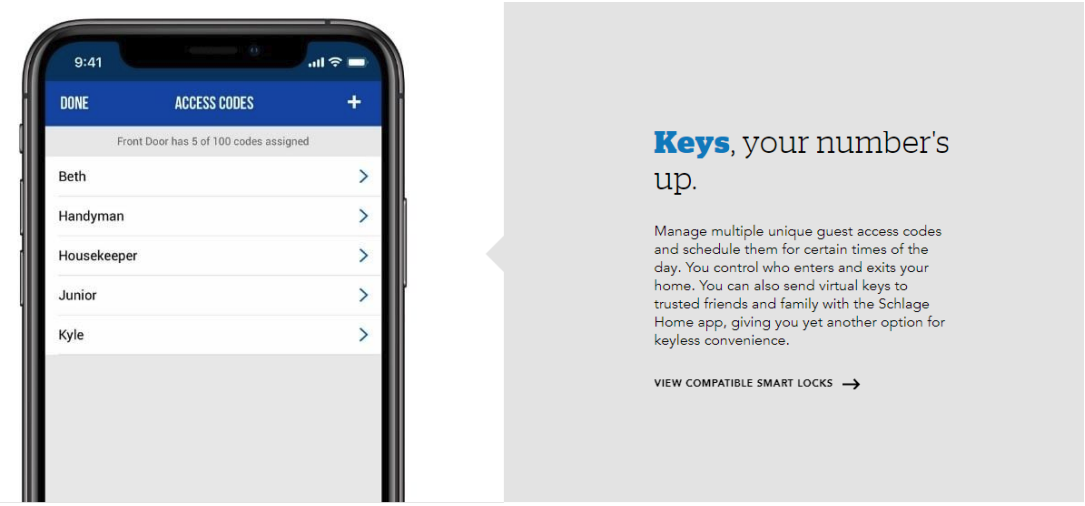

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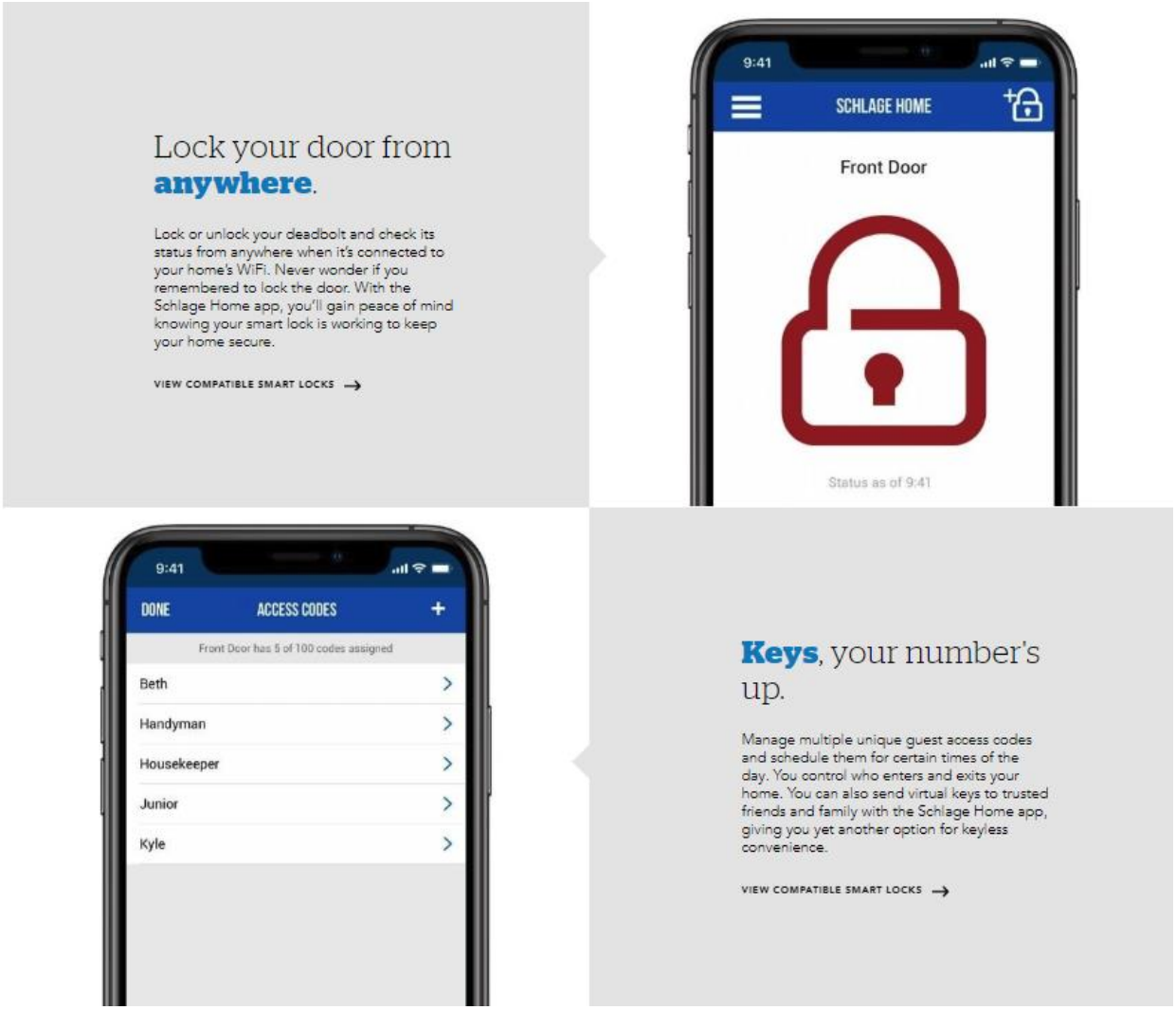
https://www.schlage.com/en/home/faq.html?id=131954.

27. Upon information and belief, the one-time use access code comprises a number generated by a cryptographically strong random number generator.



https://www.schlage.com/en/home/smart-locks/schlage-app.html.

JURY DEMAND

Smart Locking Technologies hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Smart Locking Technologies requests that this Court enter judgment against Defendant as follows:

A. An adjudication that Defendant has infringed the '918 and '873 patents;

B. A judgment that Defendant has induced infringement of the '918 and '873 patents;

C. An award of damages to be paid by Defendant adequate to compensate Smart Locking Technologies for Defendant's past infringement of the '918 and '873 patents and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

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

E. An award to Smart Locking Technologies of such further relief at law or in equity as the Court deems just and proper.

Dated: May 29, 2019

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

Stamatios Stamoulis (#4606)
Richard C. Weinblatt (#5080)
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Wilmington, DE 19801
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stamoulis@swdelaw.com
weinblatt@swdelaw.com

Attorneys for Plaintiff
Smart Locking Technologies LLC