

IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF DELAWARE

SMART LOCKING TECHNOLOGIES LLC)	
)	
Plaintiff,)	
)	Civil Action No. _____
v.)	
)	JURY TRIAL DEMANDED
AUGUST HOME, INC.)	
)	
Defendant.)	
_____)	

COMPLAINT

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

THE PARTIES

- Smart Locking Technologies is a Delaware limited liability company with a place of business located at 3511 Silverside Road, Suite 105, Wilmington, Delaware 19810.
- Defendant August Home, Inc. is a Delaware company, with, upon information and belief, a place of business located at 657 Bryant Street, San Francisco, California 94110.

JURISDICTION AND VENUE

- This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
- Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
- 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, Smart Lock Pro + Connect and Smart Lock Pro + Connect with Smart Keypad (collectively, "Smart Lock Pro"), because each and every element is met either literally or equivalently.

12. Upon information and belief, Defendant used the Smart Lock Pro 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 "August Smart Lock Pro – Features" (available at <https://www.youtube.com/watch?v=xp30DZNphGE>), Defendant used the Smart Lock Pro.

14. More specifically, Smart Lock Pro is a locking mechanism.



<https://august.com/products/asl-pro-connect-keypad>.

Experience total front door control

Lock and unlock your door from anywhere, grant secure access to friends and family, and track who is coming and going, all from the August app. Automatically unlocks when you arrive and locks when you leave. August Smart Lock Pro works with all three voice assistants - Siri, Amazon Alexa, and the Google Assistant. Comes with August Smart Keypad, so you can control your smart lock without a traditional key or phone.

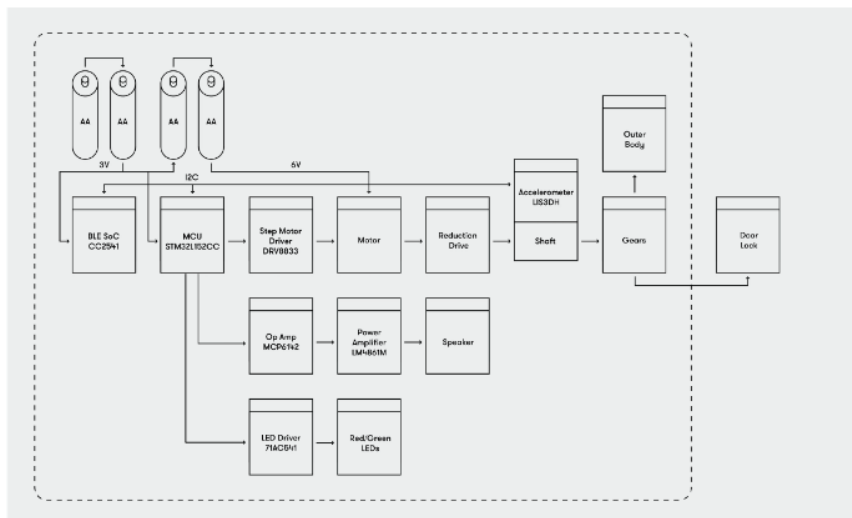
Id.

Smart Keypad

Unlock your door with secure codes. Create unique entry codes to unlock your August Smart Lock without a traditional key or phone.

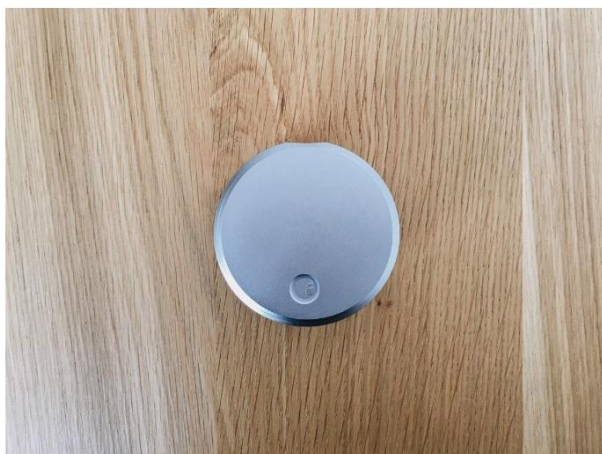
<https://august.com/pages/accessories>.

15. Smart Lock Pro includes an actuator configured to unlock in response to entry of an authorized access code.



The principle of operation is as follows—after the phone establishes a secure BLE connection with the CC2541, it sends a request to open the lock to the STM32. The STM32 rotates the motor using PWM (Pulse-width Modulation—technique for creating analogue signals using digital signal) and monitors the orientation of the shaft throughout the process by talking to the accelerometer. At the end, to make sure the deadbolt is rotated all the way, it tries to rotate it to the point when it doesn't anymore and then stops, reporting the status of the lock back to CC2541, which then relays it to the phone.

<https://medium.com/ruki-founder-s-journal/august-teardown-6274a7858338>.



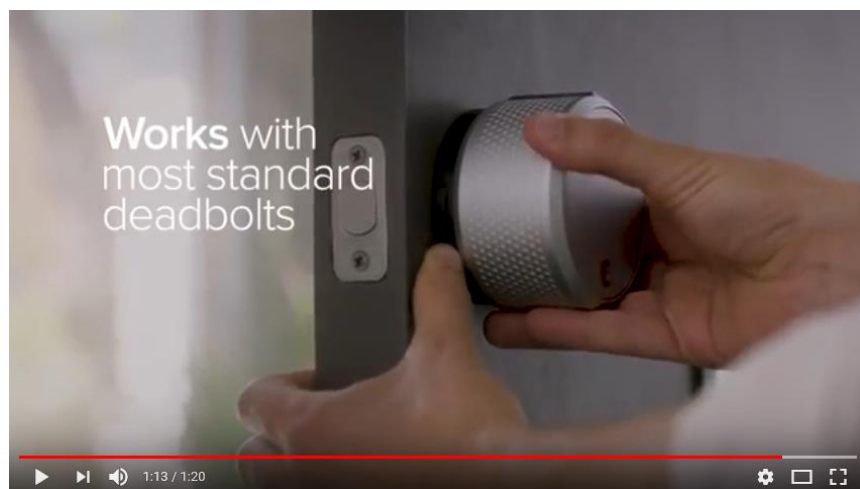
Id.



Id.



Id.



<https://youtu.be/xp30DZNphGE?t=73>

Smart Keypad

Unlock your door with secure codes. Create unique entry codes to unlock your August Smart Lock without a traditional key or phone.

<https://august.com/pages/accessories>.

To use your Personal Entry Code

1. Enter your personal entry code on the keypad
2. Press the red August button
3. The keypad light will pulse and then flash when the lock operation has been completed.

<https://support.august.com/how-to-use-a-personal-entry-code-BkiCILyCdz>.



Easy to use for everyone.

Perfect for guests, your dog walker, house cleaner, handyman, or contractor to access to your home.

<https://www.homedepot.com/p/August-Smart-Keypad-Dark-Gray-AUG-AK01-M01-G01/206823819>.

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

The perfect bundle for hosting guests

Get all the tools to grant temporary access to your rental property or your home. This exclusive bundle includes an August Smart Lock, August Connect Wi-Fi Bridge and August Smart Keypad.

<https://august.com/products/august-smarter-hosting-bundle>.

Smart Keypad

Unlock your door with secure codes. Create unique entry codes to unlock your August Smart Lock without a traditional key or phone.

<https://august.com/pages/accessories>.

To use your Personal Entry Code

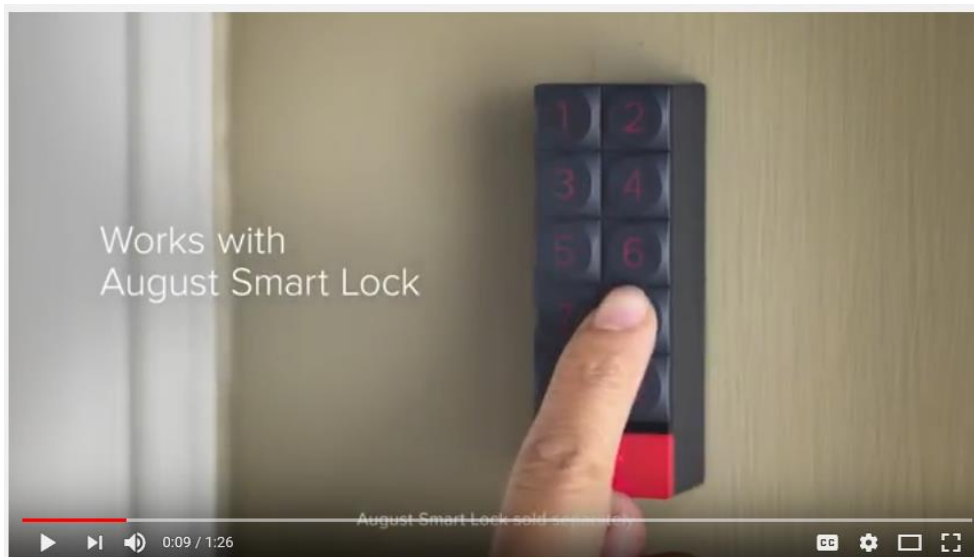
1. Enter your personal entry code on the keypad
2. Press the red August button
3. The keypad light will pulse and then flash when the lock operation has been completed.

<https://support.august.com/how-to-use-a-personal-entry-code-BkiCILyCdz>

Experience total front door control

Lock and unlock your door from anywhere, grant secure access to friends and family, and track who is coming and going, all from the August app. Automatically unlocks when you arrive and locks when you leave. August Smart Lock Pro works with all three voice assistants - Siri, Amazon Alexa, and the Google Assistant. Comes with August Smart Keypad, so you can control your smart lock without a traditional key or phone.

<https://august.com/products/asl-pro-connect-keypad>.



<https://youtu.be/SxF-vzdqgUo?t=9>.



Never leave keys under the mat again.

Create custom entry codes for family and guests to unlock your August Smart Lock without a traditional key or smartphone.

<https://www.homedepot.com/p/August-Smart-Keypad-Dark-Gray-AUG-AK01-M01-G01/206823819>.



Easy to use for everyone.

Perfect for guests, your dog walker, house cleaner, handyman, or contractor to access to your home.

Id.

How to Invite Guests to Your Smart Lock

With an August Smart Lock, it's easy to issue keys to family, friends, and services listed in your contacts. Simply send each guest an invitation to download the app. After doing so, they'll have instant access to your home based on the access levels you set.

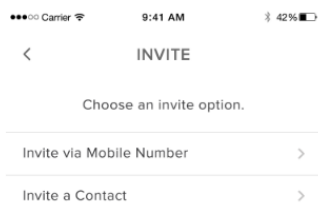
PLEASE NOTE: Guests need to have a [compatible](#) smart phone to download the August App and use your Smart Lock.

Adding a Guest

To add a guest, first send them an invite:

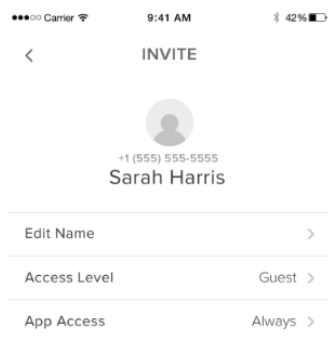
Step 1: Open the August App and select the **Guest** icon on the lower right from the menu.

Step 2: Select **Invite** and then choose an invite option. Enter the guest's phone number or select them from your contact's list to invite them to use your lock.



https://support.august.com/how-do-i-invite-guests-r1BRIIJA_M.

Step 3: Select **Send Invite** once you have added your guest and designated their access level and type. More information on access levels is available [here](#).



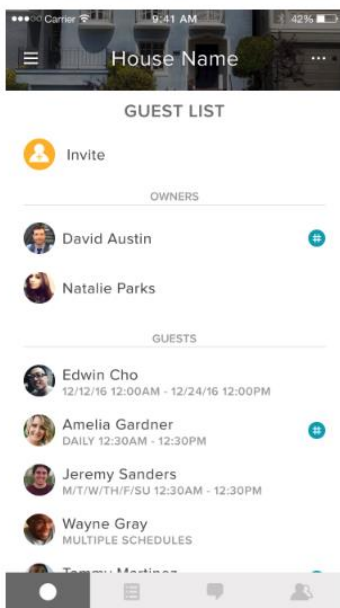
SEND INVITE

Your guest will be added to your Guest List and they will see your lock in their Keychain on their August App.

If you want to change a Guest's access to Owner, follow the directions outlined [here](#).

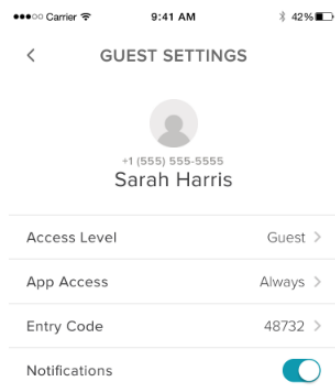
If you have an August Keypad, it's just as simple to issue your Guests an entry code. To learn about Entry Code invites, please click [here](#).

Id.



https://support.august.com/changing-guest-to-owner-HJU0LUk0_G.

Step 4: Select the "Update" option at the bottom of the screen to save your changes



Your Guest is now an Owner, and will display as an Owner in your Guest List

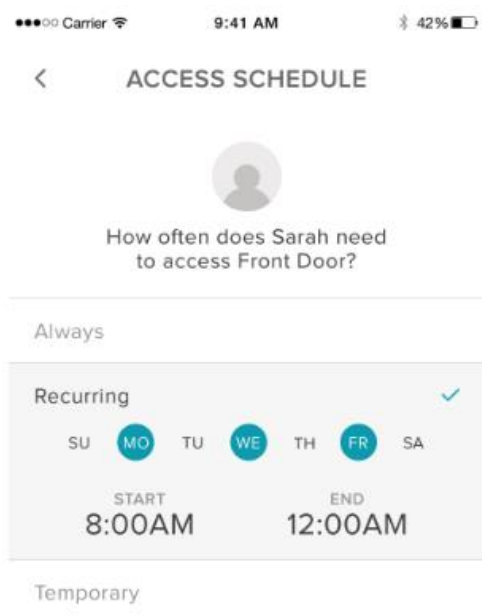
You can change a user's access level back at any time by completing these steps again and selecting Guest from the Access Level options.

How to Set Access Types: Always, Recurring, Temporary

August Smart Locks have 3 access types: Always, Temporary, and Recurring. You can choose between three different access types when adding guests to your Smart Lock.

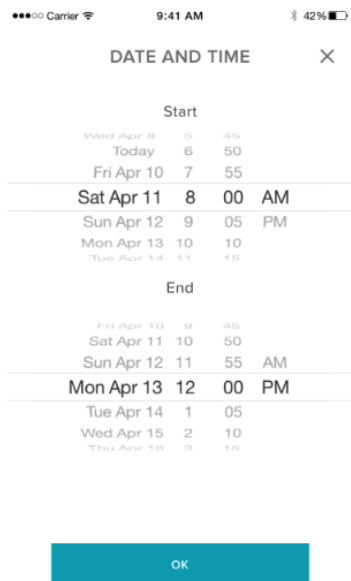
- **Always** - Guests have unlimited access, but the owner can change or delete their access at any time.
- **Recurring** - Guests have a scheduled access time that repeats. For example, guests are invited every Monday, Wednesday, and Friday morning from 8:00 am to 10:00 am.
- **Temporary** - Guests have a limited invitation to your home that expires. For example, guests have access for a one time use that is limited to the date and time you've selected.

<https://support.august.com/temporary-and-recurring-access-r13ALLJRdz>.



Id.

For Temporary access, select the time frame you want your guest to access to your lock.



Temporary guests have a limited invitation to your home that starts and expires at a specified time. For example, temporary access from 8:00 am 4/11/15 until Noon on 4/13/15. Click "Ok" when done to save updates.

Id.

How to Create Entry Codes and Invite Guests to Your Keypad

This article includes steps for giving your guests access to your home using your Smart Keypad. Use the August App and follow directions below to invite guests to your Keypad, send, and assign entry codes:

Keypad Access

1. Go to the **Guest List** screen, and select the **Invite** button
2. Choose the person you want to invite
3. Select **Access Level** on the **Invite** screen
4. Choose **Keypad Only** access level
5. Tap the back arrow
6. Select **Send Invite**

Adding an Entry Code to an App Invite

1. Go to the **Guest List** Screen, and select the **Invite** Button
2. Choose the person you want to invite
3. On the **Invite** screen, Select **Entry Code**
4. Toggle **Entry Code Active** on
5. You can customize or change the entry code by tapping on the code form field.
6. Tap the back arrow button
7. Select **Send Invite**

Giving an Entry Code to a Current Guest or Owner

1. Select the person you'd like to give a personal entry code from the **Guest List** screen
2. Select **Entry Code** from the **Guest Setting** screen
3. Toggle **Entry Code Active** on
4. You can customize or change the entry code by tapping on the code form field.
5. Tap the back arrow button
6. Select **Send Invite**

Emergency Codes

The emergency access code can be used to give immediate access to your lock if you can't give your guest a personal entry code.

https://support.august.com/how-do-i-send-my-guest-a-personal-entry-code-ry71w8J0_M.

3) Access Using Either App or Keypad

If the Host authorizes access using either the app or Smart Keypad Keypad, the guest has the option to use the entry code or the mobile app.

There are additional guests in my reservation. Will they be able to use the Smart Lock too?

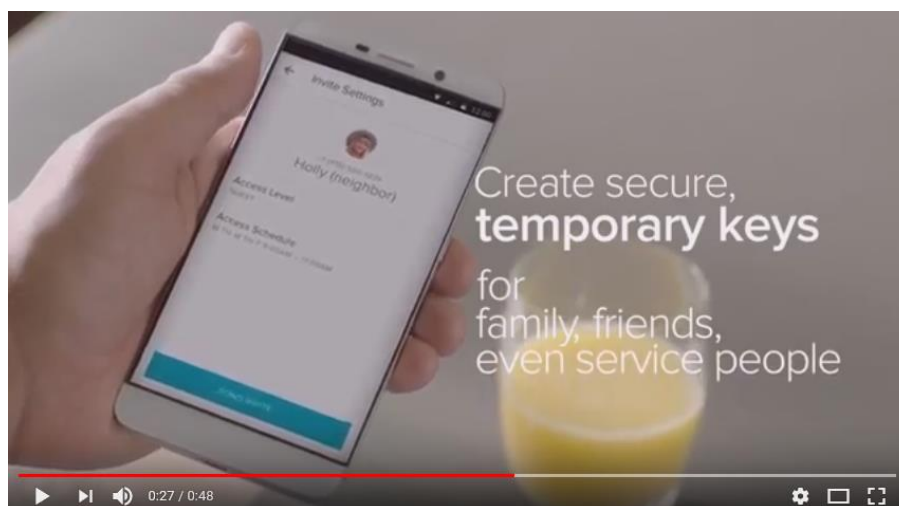
Access via App: Only the primary Airbnb guest receives automatic access. You will have to send your guests' phone numbers to the host, so the host can grant access to your additional guests.

Access via Keypad: You can share the personal entry code with your travel partners, but it should not be shared with others who are not authorized to enter the home.

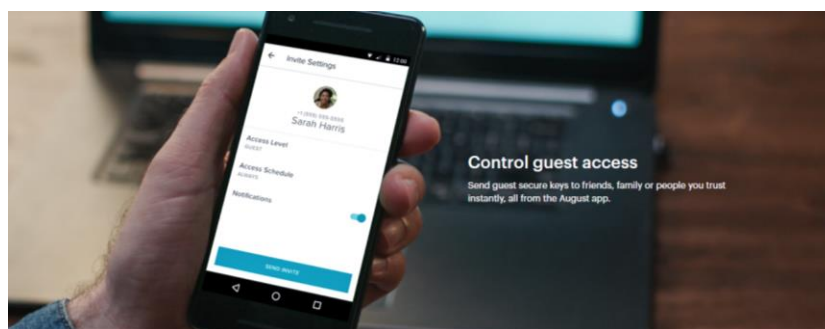
Using the Keypad to Lock and Unlock the Door

- Locate the rectangular keypad near the door of the Airbnb rental.
- Enter your personal entry code on the keypad.
- Press the red, circular button at the bottom of the keypad.
- The keypad light will pulse and then flash when the lock operation has been completed.
- You can unlock and lock the door using the same method.
- When locking the door after you leave the home, confirm that the door is locked by attempting to open the door.
- If the unlock or lock operation fails, contact your Airbnb host for assistance.

https://support.august.com/airbnb-integration-faq-B1YAULkC_z.



<https://youtu.be/9dF4-0hVGgA?t=27>.

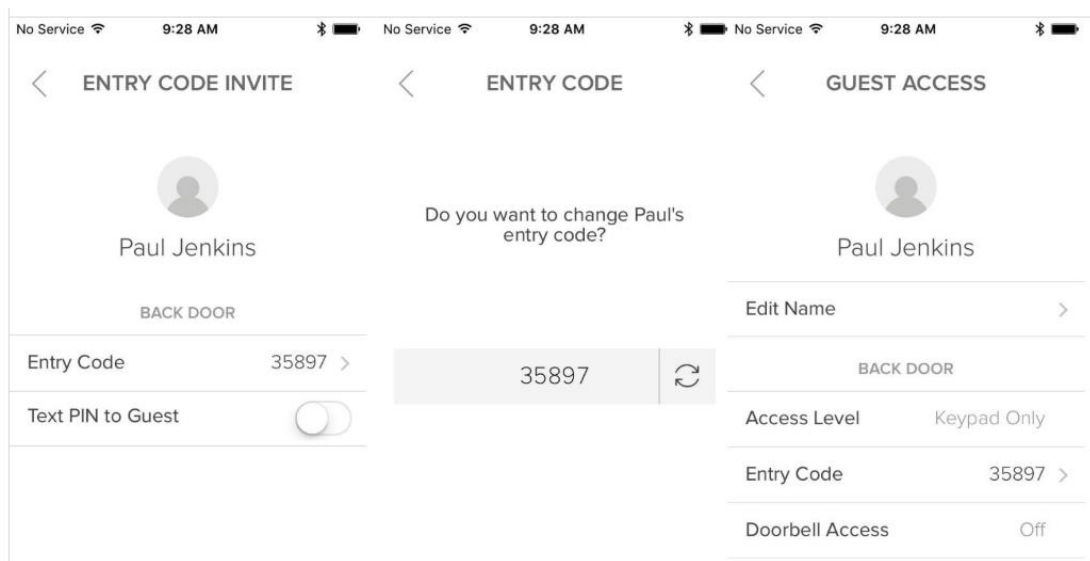


<https://august.com/products/august-smarter-hosting-bundle>.

An Owner:

- Can lock and unlock door via August app
- Can use Auto-Unlock
- Can invite/remove guests and owners
- Can control all lock settings
- Can view activity feed
- Can view guest list
- Can operate lock remotely via August Connect

https://support.august.com/changing-guest-to-owner-HJU0LUk0_G.



<https://www.slashgear.com/august-smart-keypad-review-29433805/>.

The app can generate a random code itself for each new user, or you can choose your own 4-6 digit PIN. If the guest doesn't have a smartphone, or doesn't have the August app installed and a guest account set up, you can send them their PIN via a text message.

As you'd expect, actually using the Smart Keypad is as easy as punching in a number and hitting the unlock button at the bottom. After seven failed attempts, it'll automatically disable itself for five minutes; you can optionally disable it altogether through the app, though you'll need to be within Bluetooth range.

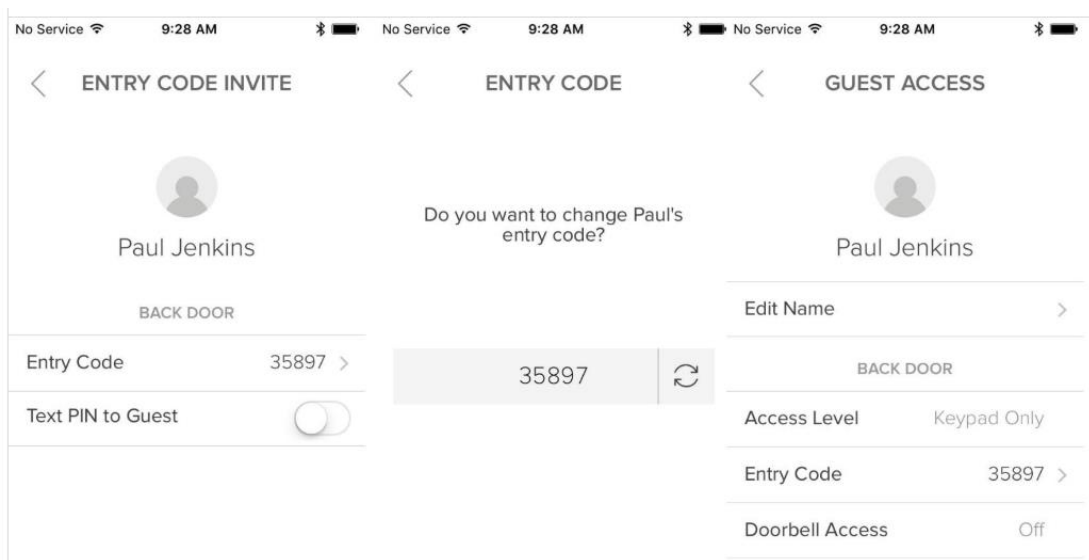
Id.

Similarly, the ability to have a code auto-expire on a set date would be useful. That way, even if you forget to delete the guest account for your maintenance person, he or she will automatically be locked out of the system at a certain time.

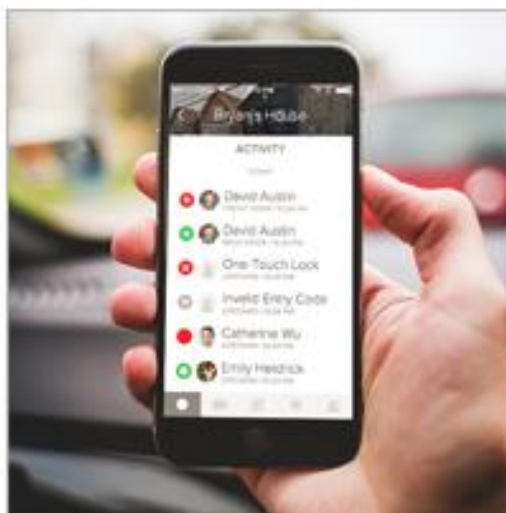
Those are all things August could easily add in via software updates; the hardware itself is simple and solid.

Id.

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



Id.

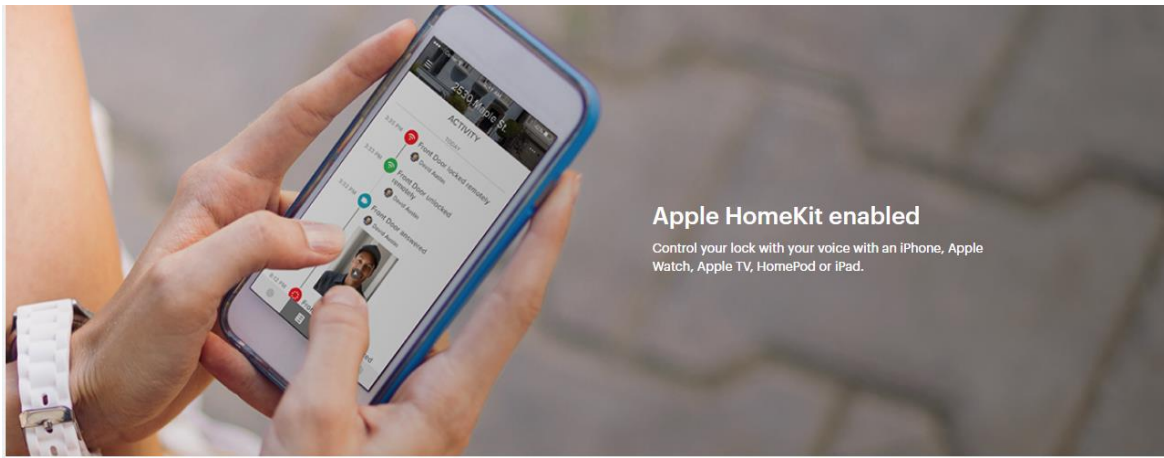


Know who comes and goes.

The activity log in the August app tracks when your door is locked and unlocked.

Requires August Smart Lock HomeKit enabled version.

<https://www.homedepot.com/p/August-Smart-Keypad-Dark-Gray-AUG-AK01-M01-G01/206823819>.



<https://august.com/products/august-smart-lock-pro-connect>.

18. Smart Lock Pro 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.

When inviting guests, you can customize their access level and choose to be notified when they operate your lock.

Access Levels:

Owners

- Can lock and unlock door via August app
- Can lock and unlock door via Personal Entry Code (Using Smart Keypad)
- Can use Auto-Unlock
- Can invite/remove other owners
- Can control all lock settings
- Can view activity feed
- Can view guest list

Guests

- Can lock and unlock door via August app
- Can lock and unlock door via Personal Entry Code (Using Smart Keypad)
- Cannot use Auto-Unlock
- Cannot invite/remove other owners
- Cannot control all lock settings
- Cannot view activity feed
- Cannot view guest list

For information on how to change a guest to an owner click [here](#)

Access Type:

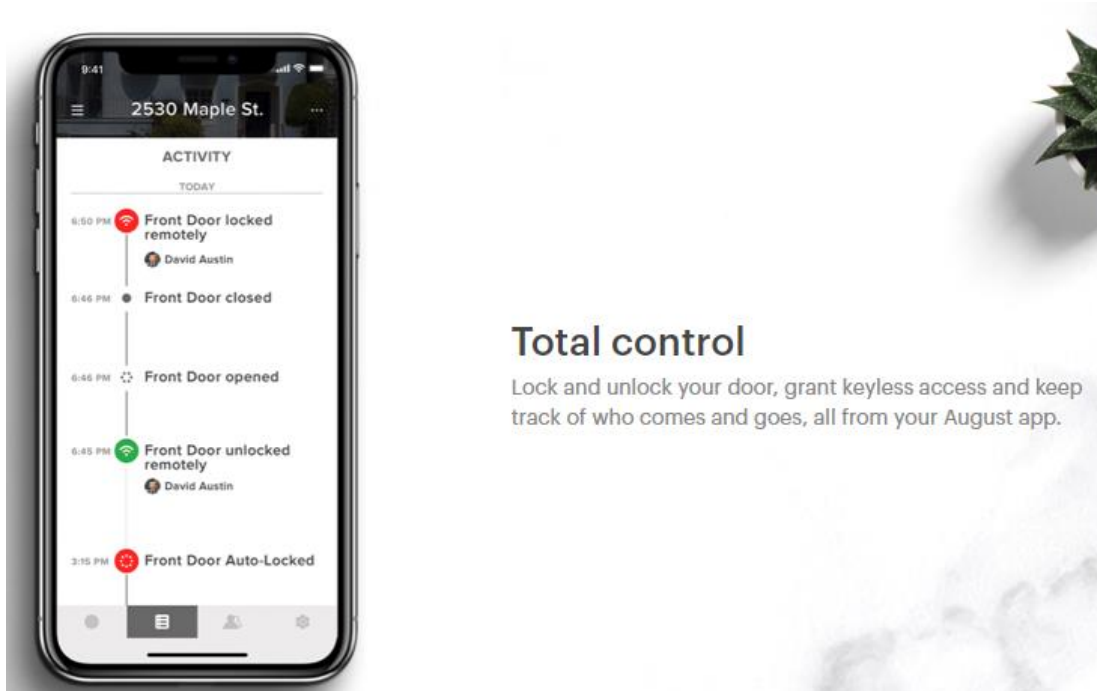
Always - Guests will have unlimited access, but the owner can change or delete their access at any time.

Recurring - Guests will have a scheduled access that repeats. i.e. guests will be invited every Tuesday for a short period of time.

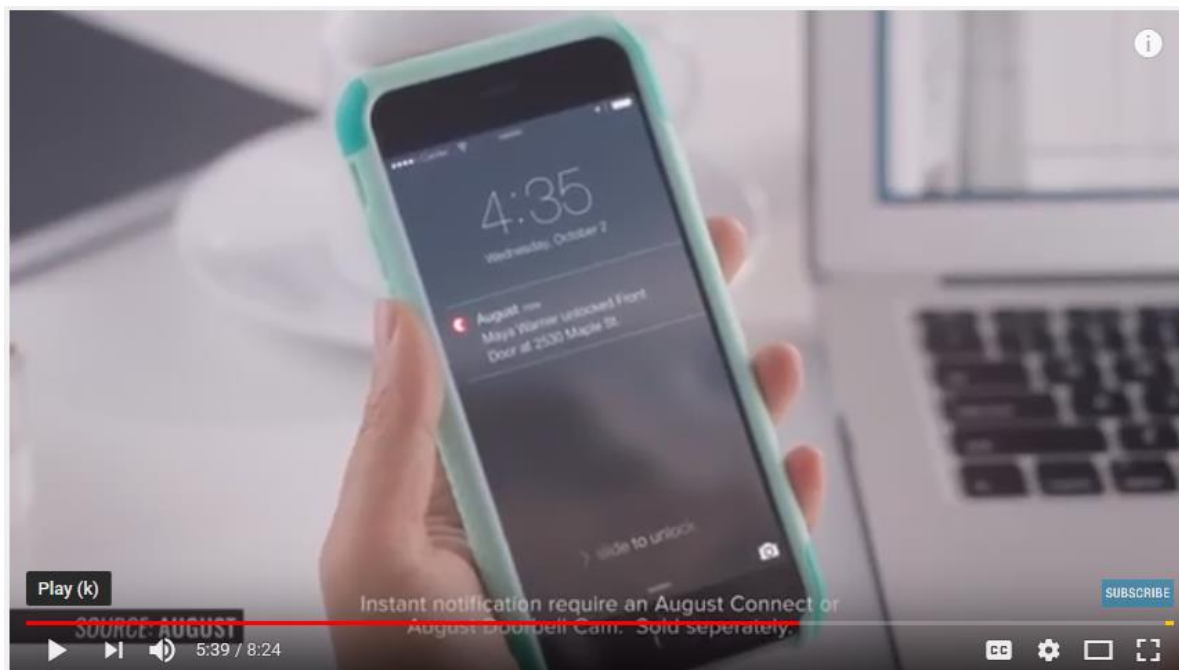
Temporary - Guests will have a limited invitation to your home that expires. i.e. guests will have access for a one time use, limited to the date and time you've selected.

Notifications- The notification toggle is specific for each guest/owner. When turned on, all owners will be alerted when that specific guest operates the lock.

<https://support.august.com/types-of-guest-access-r1C1P810uM>.



<https://august.com/products/asl-pro-connect-keypad>



https://youtu.be/eYWy49JY_fE?t=339.

Smart Alerts are sent as notifications and let you know about the activity of your Smart Lock. Many Smart Alerts appear in the Activity Feed.

Smart Alert options currently include manual lock events, user specific lock operations, notifications for when a door is left open (3rd Gen Smart Lock / Smart Lock Pro only), Auto-Lock notifications, and door locking with One-Touch Keypad operation (requires August Smart Keypad).

Over time, additional notifications and scheduling options will be added.

For the best Smart Alerts experience, we recommend that you pair August Smart Lock with August Connect.

Creating Smart Alerts

Smart Alerts can be found in the Notifications section of your lock settings.

1. Select "Create a Smart Alert" to get started.
2. Select "Choose an event".

On launch, users can select one of five alerts:

The Door is locked or unlocked manually

- This alert notifies you any time someone operates the August Smart Lock by hand or with a key.

The door is locked or unlocked by a specific user

- This alert will notify you any time a specified guest or owner operates the lock via Bluetooth. This includes unlocking the lock using the app or Auto-Unlock.

The door is left ajar (3rd Gen Smart Lock and Smart Lock Pro only)

- This alert will notify you any time the door has been left open for a specified amount of time. This time can be adjusted in the lock settings page.

The door is Auto-Locked

- This alert will notify you anytime your August Smart Lock Auto-Locks. Auto-Lock can be set up in the lock settings page.

The door is One-Touch Keypad locked (only if August Smart Keypad paired with lock)

- This alert will notify you anytime the August Smart Lock is Locked using the One-Touch Lock feature on the August Smart Keypad.

<https://www.pipedrive.com/en/blog/call-tracking-arrives-for-ios-and-android-apps> ("Pipedrive Blog").

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, Smart Lock Pro + Connect and Smart Lock Pro + Connect with Smart Keypad (collectively, "Smart Lock Pro"), because each and every element is met either literally or equivalently.

22. Upon information and belief, Defendant used the Smart Lock Pro via its internal use and testing in the United States, directly infringing one or more claims of the '873 patent.

23. For example, to create its video "August Smart Lock Pro – Features" (available at <https://www.youtube.com/watch?v=xp30DZNphGE>), Defendant used the Smart Lock Pro.

24. More specifically and upon information and belief, Smart Lock Pro is a locking mechanism.



<https://august.com/products/asl-pro-connect-keypad>.

Experience total front door control

Lock and unlock your door from anywhere, grant secure access to friends and family, and track who is coming and going, all from the August app. Automatically unlocks when you arrive and locks when you leave. August Smart Lock Pro works with all three voice assistants - Siri, Amazon Alexa, and the Google Assistant. Comes with August Smart Keypad, so you can control your smart lock without a traditional key or phone.

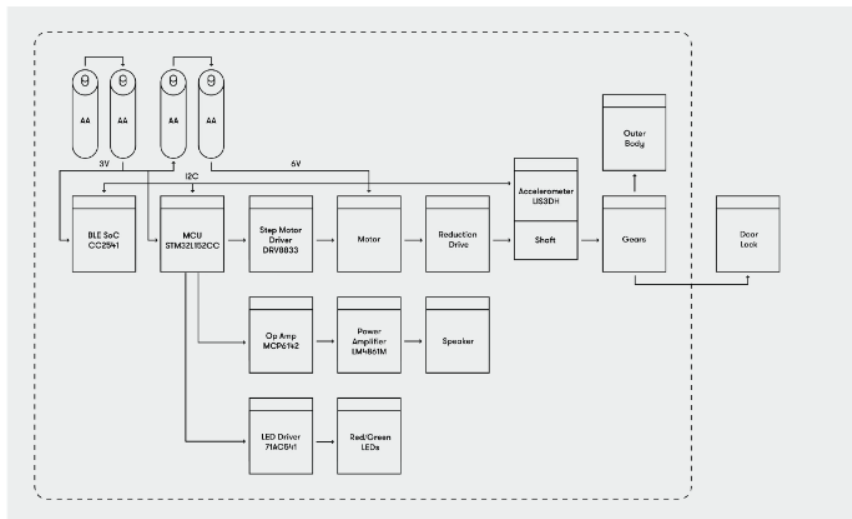
Id.

Smart Keypad

Unlock your door with secure codes. Create unique entry codes to unlock your August Smart Lock without a traditional key or phone.

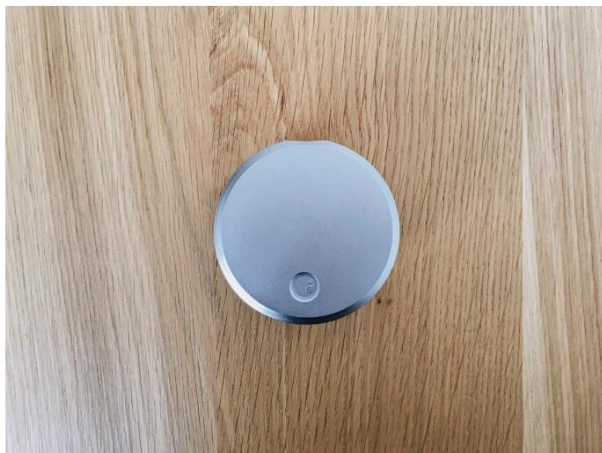
<https://august.com/pages/accessories>.

25. Smart Lock Pro includes an actuator configured to unlock in response to entry of an authorized access code.



The principle of operation is as follows—after the phone establishes a secure BLE connection with the CC2541, it sends a request to open the lock to the STM32. The STM32 rotates the motor using PWM (Pulse-width Modulation—technique for creating analogue signals using digital signal) and monitors the orientation of the shaft throughout the process by talking to the accelerometer. At the end, to make sure the deadbolt is rotated all the way, it tries to rotate it to the point when it doesn't anymore and then stops, reporting the status of the lock back to CC2541, which then relays it to the phone.

<https://medium.com/ruki-founder-s-journal/august-teardown-6274a7858338>.



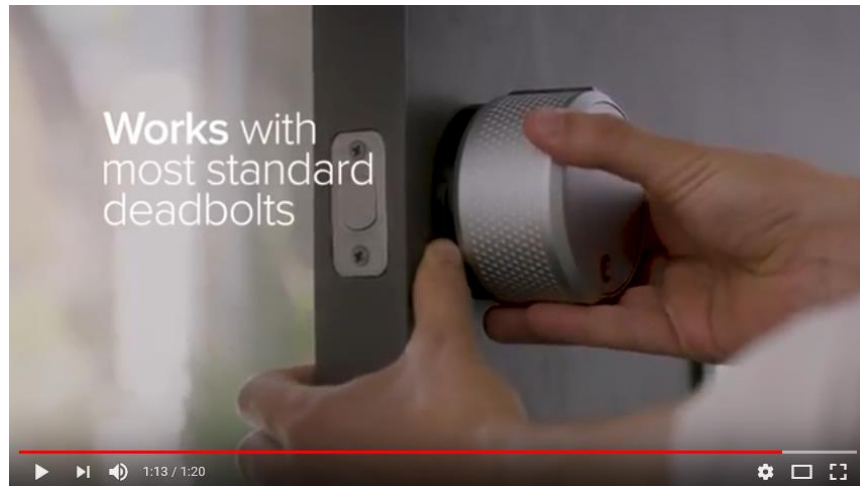
Id.



Id.



Id.



<https://youtu.be/xp30DZNphGE?t=73>

Smart Keypad

Unlock your door with secure codes. Create unique entry codes to unlock your August Smart Lock without a traditional key or phone.

<https://august.com/pages/accessories>.

To use your Personal Entry Code

1. Enter your personal entry code on the keypad
2. Press the red August button
3. The keypad light will pulse and then flash when the lock operation has been completed.

<https://support.august.com/how-to-use-a-personal-entry-code-BkiCILyCdz>.



Easy to use for everyone.

Perfect for guests, your dog walker, house cleaner, handyman, or contractor to access to your home.

<https://www.homedepot.com/p/August-Smart-Keypad-Dark-Gray-AUG-AK01-M01-G01/206823819>.

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

The perfect bundle for hosting guests

Get all the tools to grant temporary access to your rental property or your home. This exclusive bundle includes an August Smart Lock, August Connect Wi-Fi Bridge and August Smart Keypad.

<https://august.com/products/august-smarter-hosting-bundle>.

Smart Keypad

Unlock your door with secure codes. Create unique entry codes to unlock your August Smart Lock without a traditional key or phone.

<https://august.com/pages/accessories>.

To use your Personal Entry Code

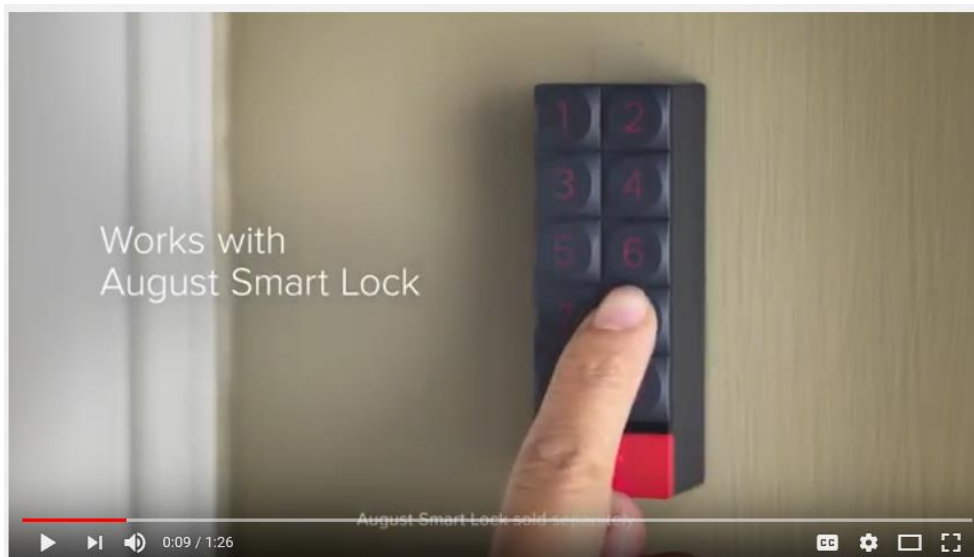
1. Enter your personal entry code on the keypad
2. Press the red August button
3. The keypad light will pulse and then flash when the lock operation has been completed.

<https://support.august.com/how-to-use-a-personal-entry-code-BkiCILyCdz>

Experience total front door control

Lock and unlock your door from anywhere, grant secure access to friends and family, and track who is coming and going, all from the August app. Automatically unlocks when you arrive and locks when you leave. August Smart Lock Pro works with all three voice assistants - Siri, Amazon Alexa, and the Google Assistant. Comes with August Smart Keypad, so you can control your smart lock without a traditional key or phone.

<https://august.com/products/asl-pro-connect-keypad>.



<https://youtu.be/SxF-vzdqgUo?t=9>.



Never leave keys under the mat again.

Create custom entry codes for family and guests to unlock your August Smart Lock without a traditional key or smartphone.

<https://www.homedepot.com/p/August-Smart-Keypad-Dark-Gray-AUG-AK01-M01-G01/206823819>.



Easy to use for everyone.

Perfect for guests, your dog walker, house cleaner, handyman, or contractor to access to your home.

Id.

How to Invite Guests to Your Smart Lock

With an August Smart Lock, it's easy to issue keys to family, friends, and services listed in your contacts. Simply send each guest an invitation to download the app. After doing so, they'll have instant access to your home based on the access levels you set.

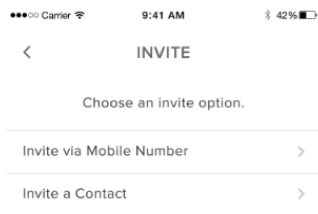
PLEASE NOTE: Guests need to have a [compatible](#) smart phone to download the August App and use your Smart Lock.

Adding a Guest

To add a guest, first send them an invite:

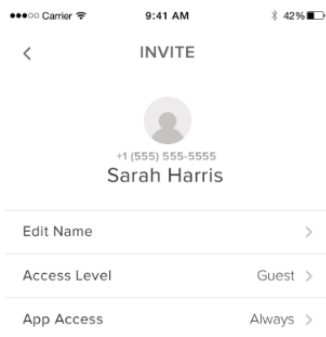
Step 1: Open the August App and select the **Guest** icon on the lower right from the menu.

Step 2: Select **Invite** and then choose an invite option. Enter the guest's phone number or select them from your contact's list to invite them to use your lock.



https://support.august.com/how-do-i-invite-guests-r1BRIIJA_M.

Step 3: Select **Send Invite** once you have added your guest and designated their access level and type. More information on access levels is available [here](#).



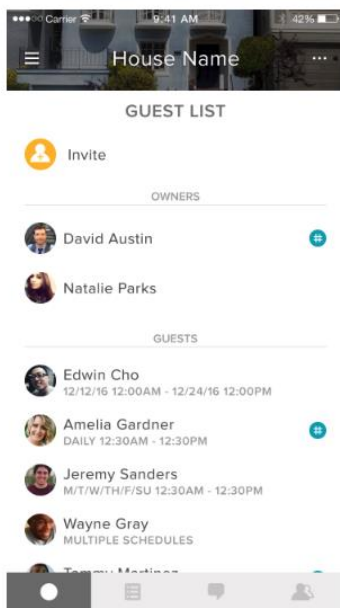
SEND INVITE

Your guest will be added to your Guest List and they will see your lock in their Keychain on their August App.

If you want to change a Guest's access to Owner, follow the directions outlined [here](#).

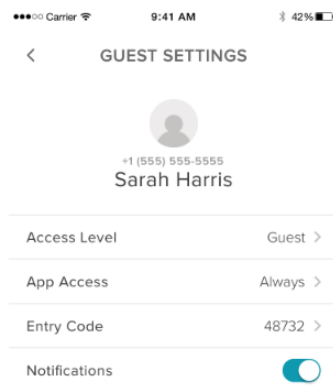
If you have an August Keypad, it's just as simple to issue your Guests an entry code. To learn about Entry Code invites, please click [here](#).

Id.



https://support.august.com/changing-guest-to-owner-HJU0LUk0_G.

Step 4: Select the "Update" option at the bottom of the screen to save your changes



Your Guest is now an Owner, and will display as an Owner in your Guest List

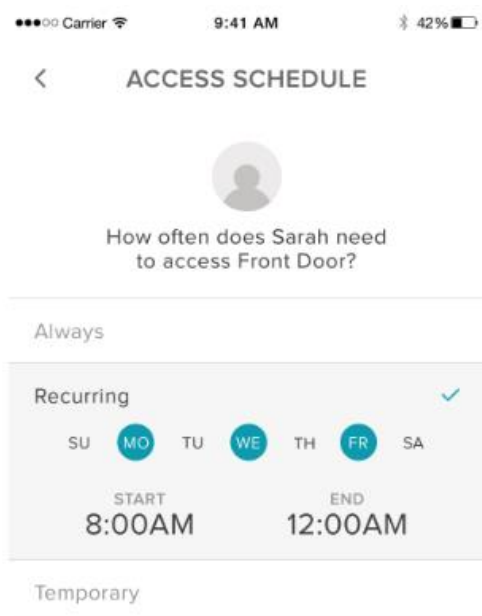
You can change a user's access level back at any time by completing these steps again and selecting Guest from the Access Level options.

How to Set Access Types: Always, Recurring, Temporary

August Smart Locks have 3 access types: Always, Temporary, and Recurring. You can choose between three different access types when adding guests to your Smart Lock.

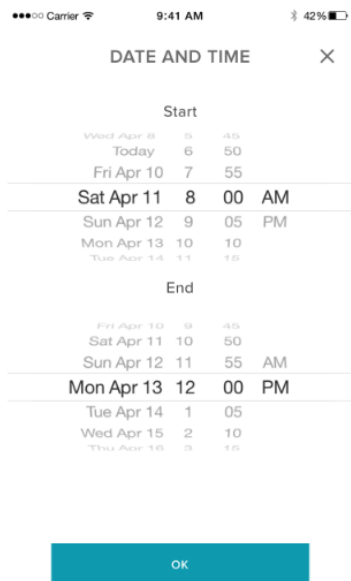
- **Always** - Guests have unlimited access, but the owner can change or delete their access at any time.
- **Recurring** - Guests have a scheduled access time that repeats. For example, guests are invited every Monday, Wednesday, and Friday morning from 8:00 am to 10:00 am.
- **Temporary** - Guests have a limited invitation to your home that expires. For example, guests have access for a one time use that is limited to the date and time you've selected.

<https://support.august.com/temporary-and-recurring-access-r13ALLJRdz>.



Id.

For Temporary access, select the time frame you want your guest to access to your lock.



Temporary guests have a limited invitation to your home that starts and expires at a specified time. For example, temporary access from 8:00 am 4/11/15 until Noon on 4/13/15. Click "Ok" when done to save updates.

Id.

How to Create Entry Codes and Invite Guests to Your Keypad

This article includes steps for giving your guests access to your home using your Smart Keypad. Use the August App and follow directions below to invite guests to your Keypad, send, and assign entry codes:

Keypad Access

1. Go to the **Guest List** screen, and select the **Invite** button
2. Choose the person you want to invite
3. Select **Access Level** on the **Invite** screen
4. Choose **Keypad Only** access level
5. Tap the back arrow
6. Select **Send Invite**

Adding an Entry Code to an App Invite

1. Go to the **Guest List** Screen, and select the **Invite** Button
2. Choose the person you want to invite
3. On the **Invite** screen, Select **Entry Code**
4. Toggle **Entry Code Active** on
5. You can customize or change the entry code by tapping on the code form field.
6. Tap the back arrow button
7. Select **Send Invite**

Giving an Entry Code to a Current Guest or Owner

1. Select the person you'd like to give a personal entry code from the **Guest List** screen
2. Select **Entry Code** from the **Guest Setting** screen
3. Toggle **Entry Code Active** on
4. You can customize or change the entry code by tapping on the code form field.
5. Tap the back arrow button
6. Select **Send Invite**

Emergency Codes

The emergency access code can be used to give immediate access to your lock if you can't give your guest a personal entry code.

https://support.august.com/how-do-i-send-my-guest-a-personal-entry-code-ry71w8J0_M.

3) Access Using Either App or Keypad

If the Host authorizes access using either the app or Smart Keypad Keypad, the guest has the option to use the entry code or the mobile app.

There are additional guests in my reservation. Will they be able to use the Smart Lock too?

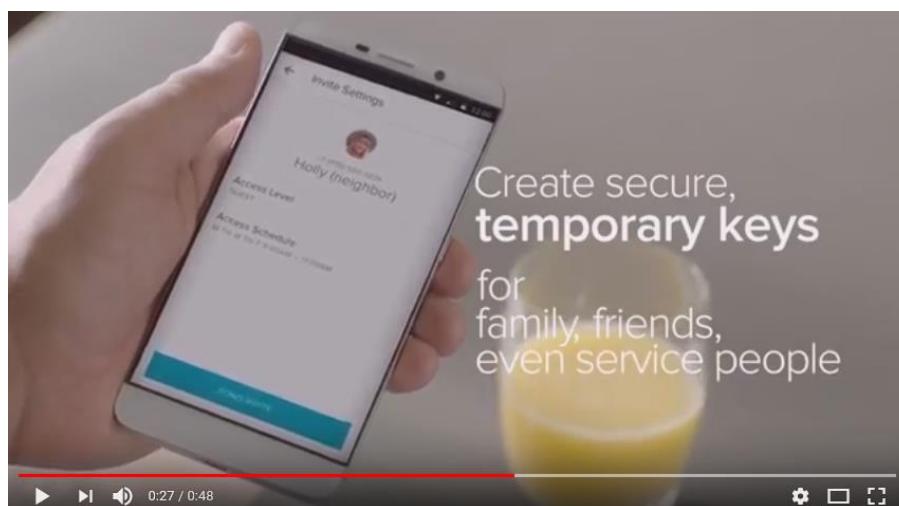
Access via App: Only the primary Airbnb guest receives automatic access. You will have to send your guests' phone numbers to the host, so the host can grant access to your additional guests.

Access via Keypad: You can share the personal entry code with your travel partners, but it should not be shared with others who are not authorized to enter the home.

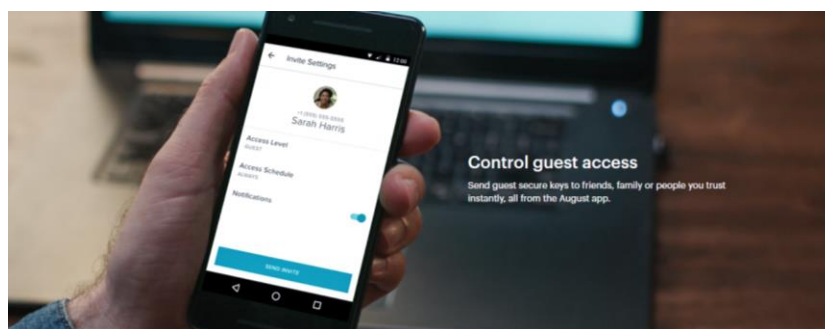
Using the Keypad to Lock and Unlock the Door

- Locate the rectangular keypad near the door of the Airbnb rental.
- Enter your personal entry code on the keypad.
- Press the red, circular button at the bottom of the keypad.
- The keypad light will pulse and then flash when the lock operation has been completed.
- You can unlock and lock the door using the same method.
- When locking the door after you leave the home, confirm that the door is locked by attempting to open the door.
- If the unlock or lock operation fails, contact your Airbnb host for assistance.

https://support.august.com/airbnb-integration-faq-B1YAULkC_z.



<https://youtu.be/9dF4-0hVGgA?t=27>.

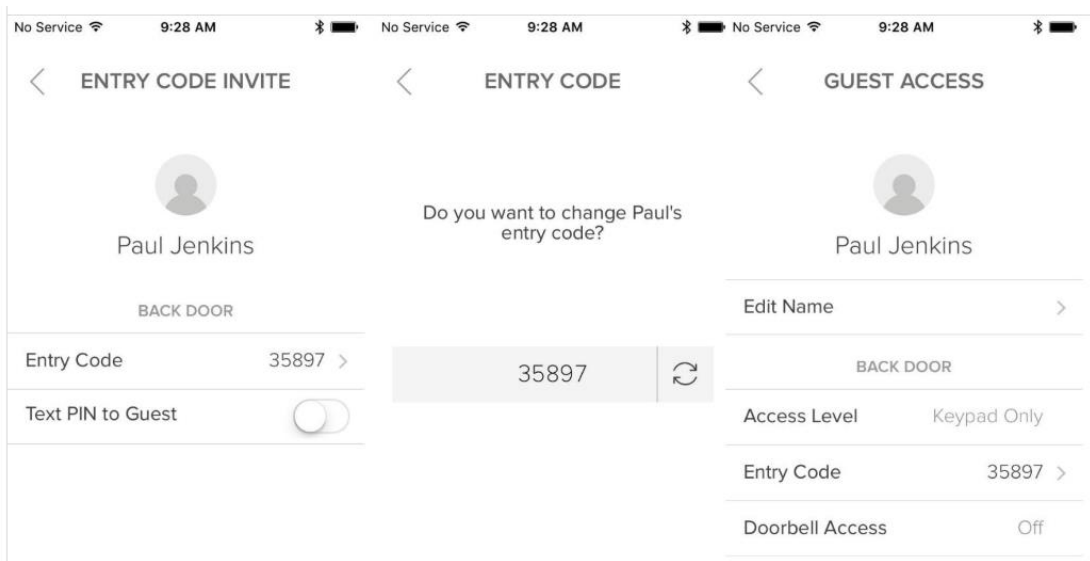


<https://august.com/products/august-smarter-hosting-bundle>.

An Owner:

- Can lock and unlock door via August app
- Can use Auto-Unlock
- Can invite/remove guests and owners
- Can control all lock settings
- Can view activity feed
- Can view guest list
- Can operate lock remotely via August Connect

https://support.august.com/changing-guest-to-owner-HJU0LUk0_G.



<https://www.slashgear.com/august-smart-keypad-review-29433805/>.

The app can generate a random code itself for each new user, or you can choose your own 4-6 digit PIN. If the guest doesn't have a smartphone, or doesn't have the August app installed and a guest account set up, you can send them their PIN via a text message.

As you'd expect, actually using the Smart Keypad is as easy as punching in a number and hitting the unlock button at the bottom. After seven failed attempts, it'll automatically disable itself for five minutes; you can optionally disable it altogether through the app, though you'll need to be within Bluetooth range.

Id.

Similarly, the ability to have a code auto-expire on a set date would be useful. That way, even if you forget to delete the guest account for your maintenance person, he or she will automatically be locked out of the system at a certain time.

Those are all things August could easily add in via software updates; the hardware itself is simple and solid.

Id.

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

The app can generate a random code itself for each new user, or you can choose your own 4-6 digit PIN. If the guest doesn't have a smartphone, or doesn't have the August app installed and a guest account set up, you can send them their PIN via a text message.

Id.

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)

800 N. West Street, Third Floor

Wilmington, DE 19801

(302) 999-1540

stamoulis@swdelaw.com

weinblatt@swdelaw.com

Attorneys for Plaintiff

Smart Locking Technologies LLC