

IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF DELAWARE

| | | |
|--------------------------------|---|----------------------------|
| SMART LOCKING TECHNOLOGIES LLC |) | |
| |) | |
| Plaintiff, |) | |
| |) | Civil Action No. _____ |
| v. |) | |
| |) | JURY TRIAL DEMANDED |
| IGLOOHOME 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

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 Igloohome Inc. is a Delaware company, with, upon information and belief, a place of business located at 2200 Benjamin Franklin Parkway, Philadelphia, Pennsylvania 19130.

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

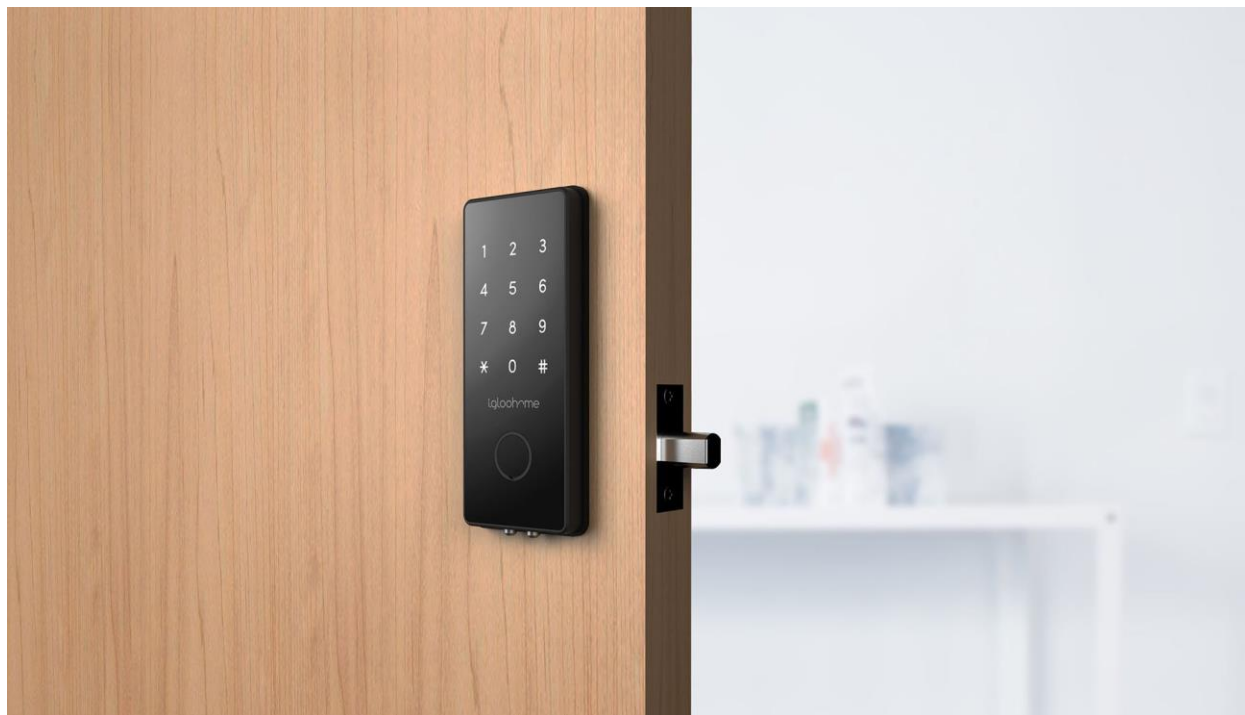
10. Smart Locking Technologies repeats and realleges the allegations of paragraphs 1 through 9 as if fully set forth herein.

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, Deadbolt 2S ("Smart Deadbolt"), because each and every element is met either literally or equivalently.

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

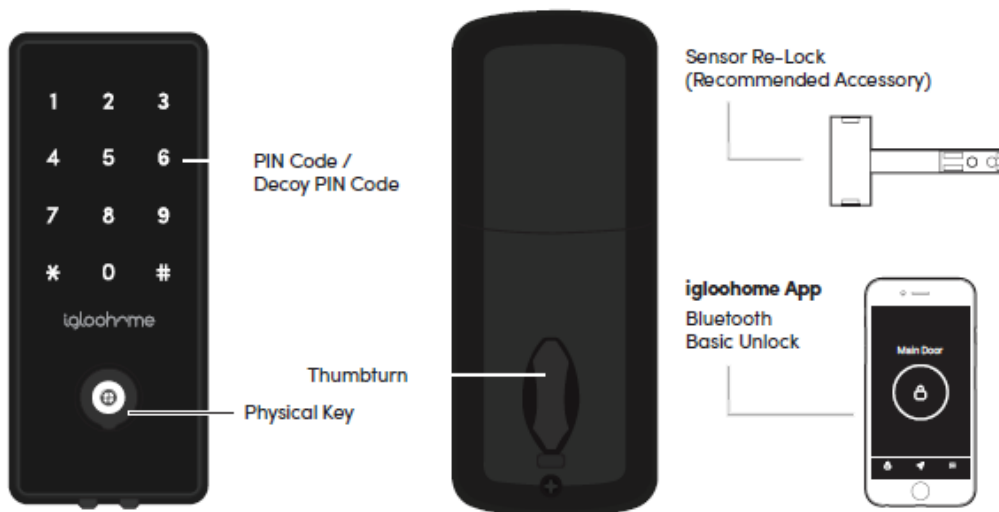
13. For example, to create its video "igloohome Smart Deadbolt || Official Video" (available at <https://youtu.be/Kwuxk7XPrEM>), Defendant used the Smart Deadbolt.

14. More specifically, Smart Deadbolt is a locking mechanism.



<https://www.igloohome.co/products/deadbolt-2s/>.

Unlocking & Locking



Unlocking



PIN Code
Key in your PIN code and press '#'



Bluetooth Guest Key
Refer to page 23



Bluetooth Basic Unlock
On your app, click on the Bluetooth Unlock button and tap on your lock



Physical Key
Use the physical key to unlock the door



Thumbturn
Use thumbturn at the back of lock

Locking



'#' Key
Press and hold '#'



Physical Key
Use the physical key to lock the door



Timer Re-Lock
Refer to page 24



Thumbturn
Use thumbturn at the back of lock



Sensor Re-Lock (Recommended Accessory)
Automatic locking after door closes

Installers & User Guide Deadbolt 2S. ("Manual") at p. 21 (available at https://drive.google.com/file/d/1NiqJzXed81ysuluOAhhWuMnEDt0yg4af/view?_ga=2.87073560.1621303424.1558419509-1177689229.1557826393).

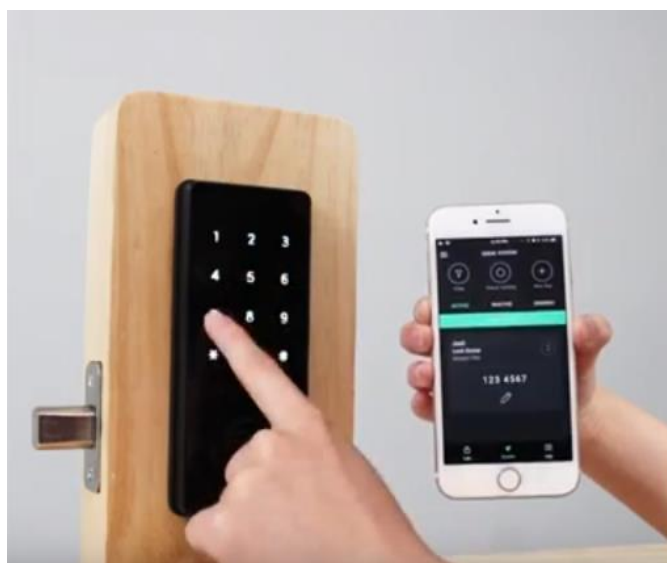
15. Smart Deadbolt includes an actuator configured to unlock in response to entry of an authorized access code.

To unlock your door with a PIN, simply touch your palm over the keypad of the lock to wake it up. Key in your PIN code, followed by '#'.

Each lock comes with a Master PIN which can be changed on the app (between 7-9 digits).

You can also generate and manage PIN codes with your igloohome mobile app.

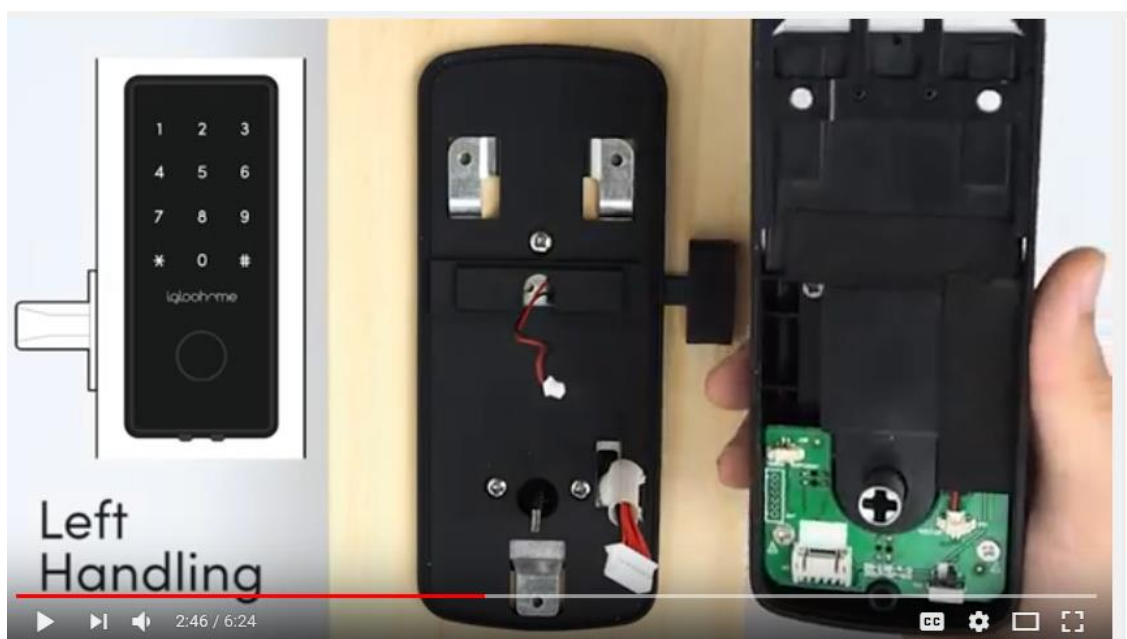
<https://igloohome.freshdesk.com/support/solutions/articles/35000013952-how-does-pin-code-unlock-work->.



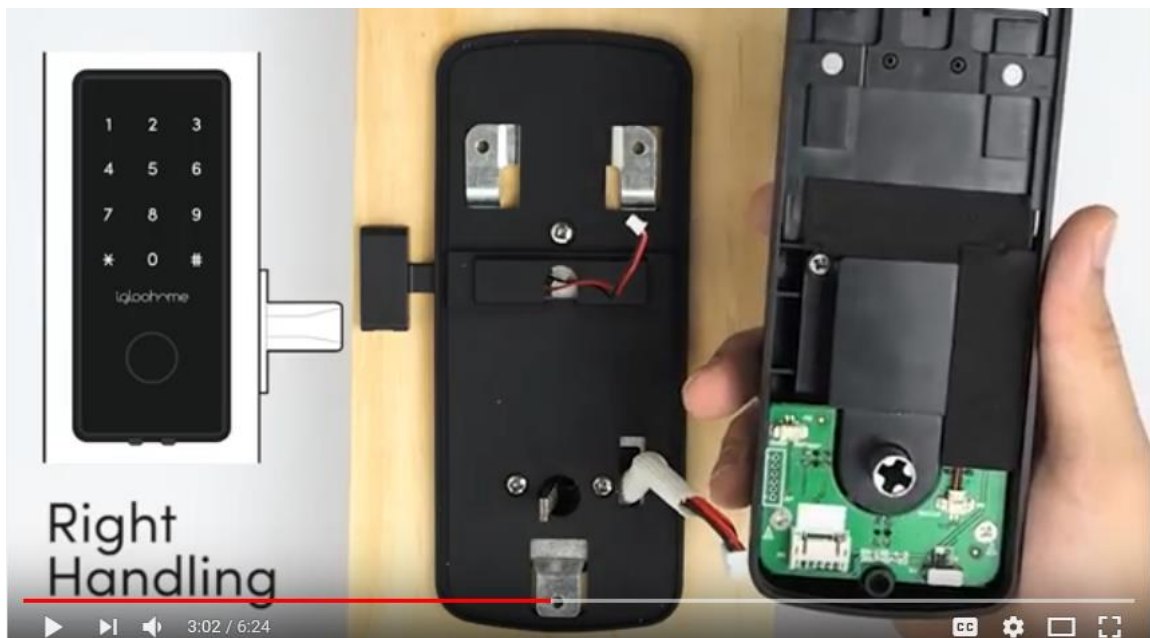
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<https://youtu.be/FIQnhkTUpms?t=31>.

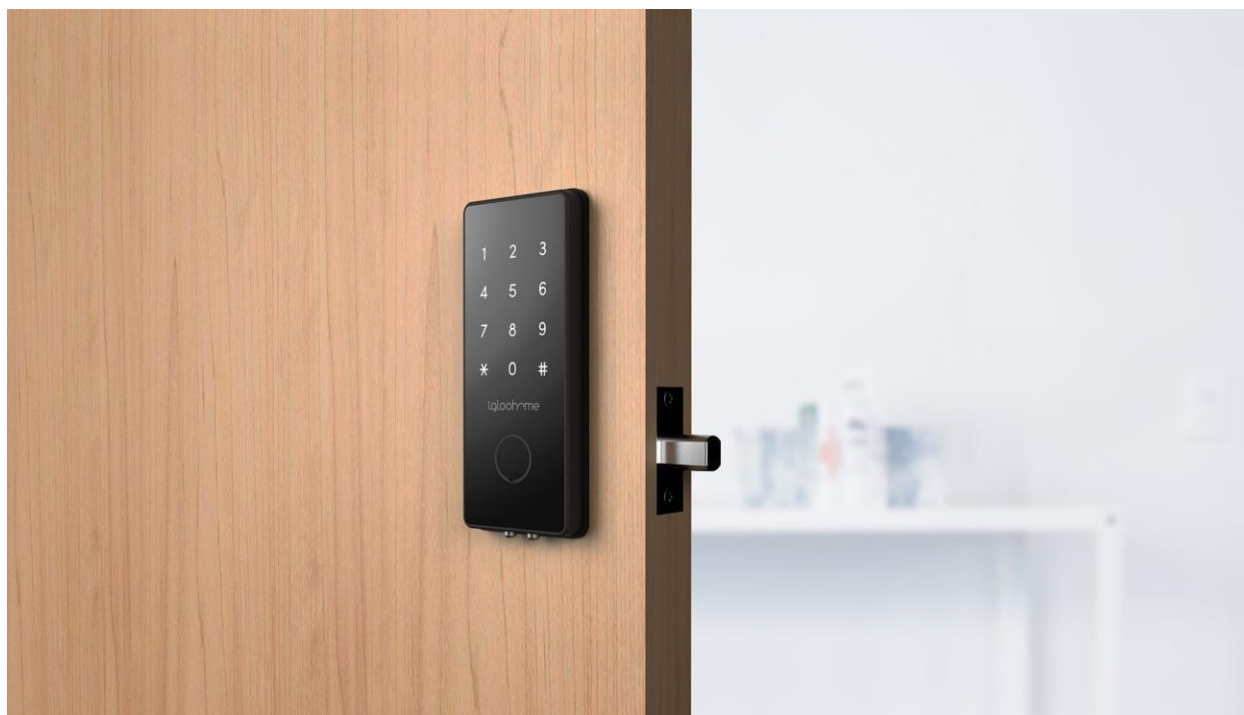


https://youtu.be/PHZkBdq3_WY?t=166.

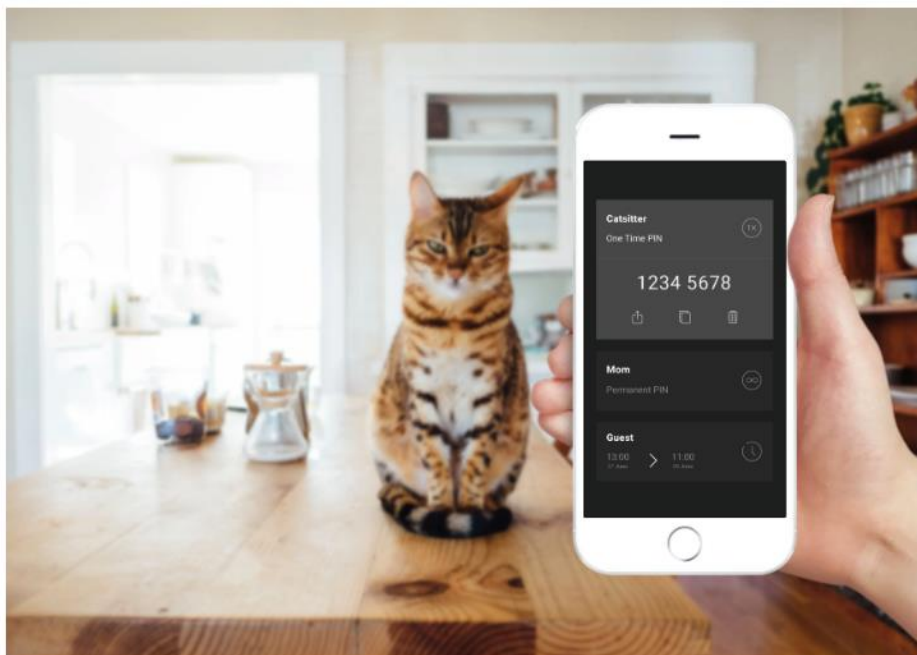


https://youtu.be/PHZkBdq3_WY?t=182.

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



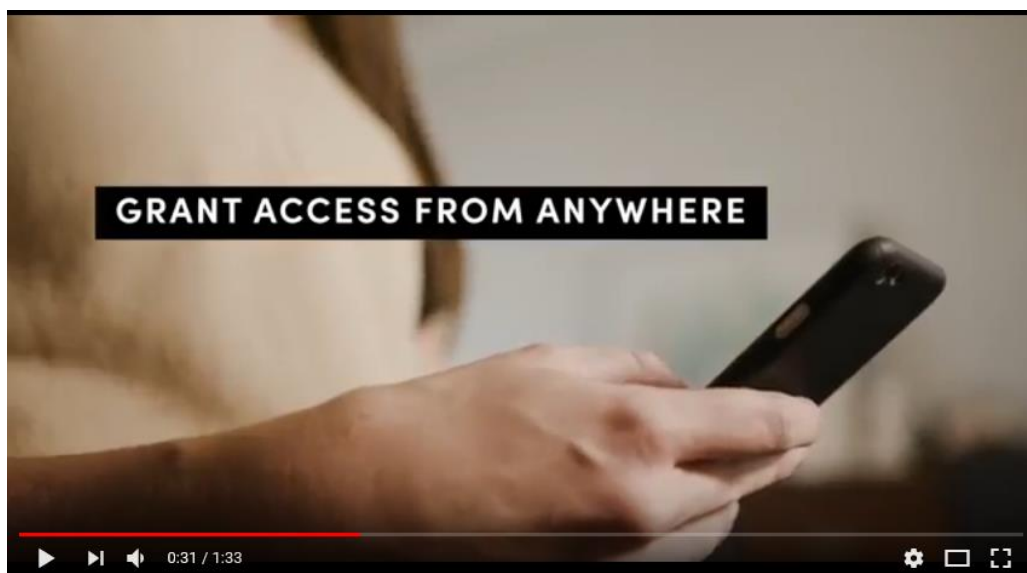
<https://www.igloohome.co/products/deadbolt-2s/>.



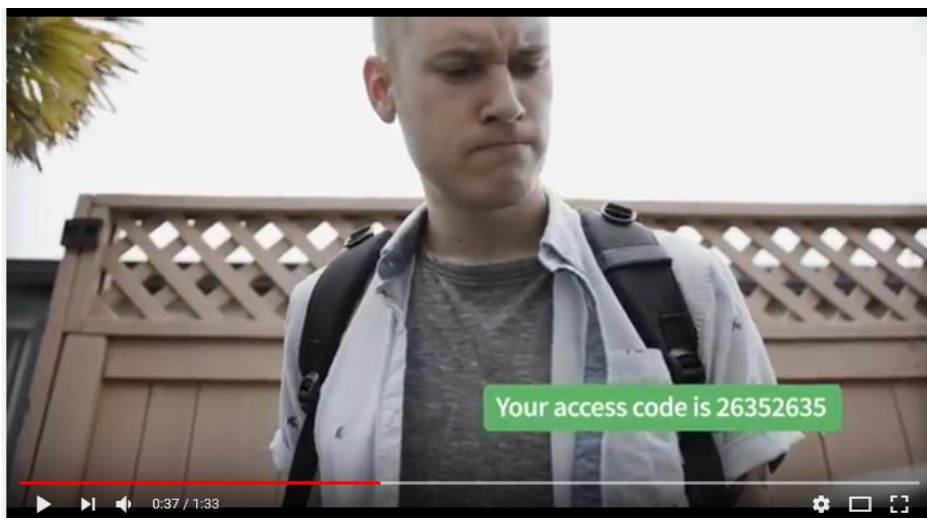
Grant access to your home even when you're away.

With the igloohome mobile app, create PIN codes or bluetooth keys, and select how long you want them to be valid for. Send them to your visitors from the app.

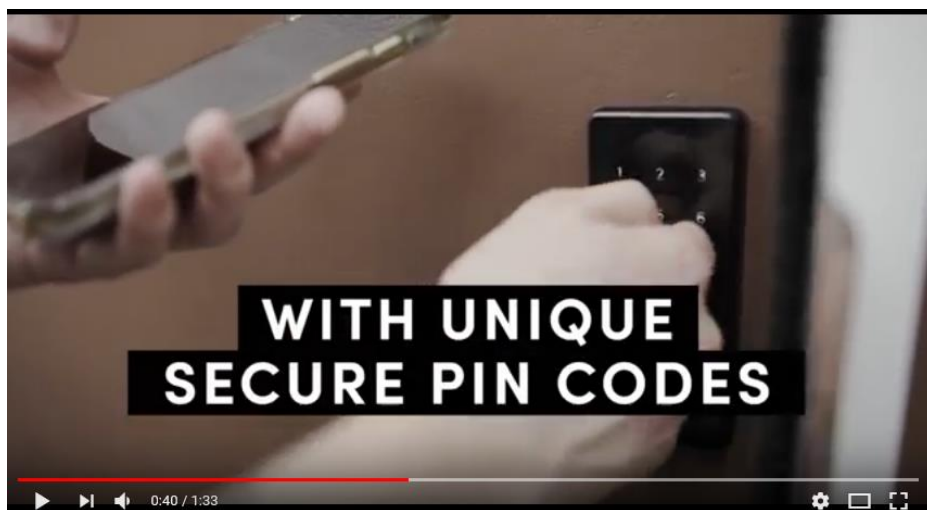
[https://www.igloohome.co/products/deadbolt-2s/?_ga=2.138503479.520391978.1555300236-562153576.1554518717.](https://www.igloohome.co/products/deadbolt-2s/?_ga=2.138503479.520391978.1555300236-562153576.1554518717)



[https://youtu.be/Kwuxk7XPrEM?t=31.](https://youtu.be/Kwuxk7XPrEM?t=31)



<https://youtu.be/Kwuxk7XPrEM?t=37>.



<https://youtu.be/Kwuxk7XPrEM?t=40>.



<https://youtu.be/Kwuxk7XPrEM?t=46>.

I am a guest. How do I unlock the door?



Modified on: Thu, 7 Feb, 2019 at 4:16 PM

If you are a guest, your host would have provided you with one of the following methods of entry:

PIN code

- The PIN code is a series of numbers that you can key into the igloohome smart lock.
- After keying in your PIN, press the # key to unlock (Key icon for Latch Model).
- Depending on the type of PIN code your host has given you, it may expire.

Bluetooth Unlock

- Open the igloohome app and login
- Go to Visits under the Menu, and you will be able to view your Bluetooth Key(s).
- Click on the Bluetooth Key icon to unlock.
- Make sure that you have a strong Bluetooth and Internet connection on your phone.

<https://igloohome.freshdesk.com/support/solutions/articles/35000013987-i-am-a-guest-how-do-i-unlock-the-door->.

Managing Access in App

1 Creating PIN codes

PIN codes can be generated on the app under **[Access]**, create **[New Key]** and choose either One-Time, Permanent or Duration PIN.

Pin codes will expire if its not use within its activation period. Refer to the table below.

| PIN Type | Use PIN within* |
|---------------|---------------------------|
| One-Time PIN | 6 hrs of generation |
| Permanent PIN | 24hrs of generation |
| Duration PIN | 24hrs from the start time |

2 Bluetooth Guest Key

Bluetooth Guest Key can be shared with other users for mobile access. It allows your guests to unlock the igloohome smart lock via Bluetooth.

There are 3 steps to using a Shared Bluetooth Key

1. Under **[Access]**, create **[New Key]** and choose **[Bluetooth Key]** under **[Access Type]**. Proceed to share the key after it is created.
2. Guest receives the Bluetooth Key by one of these methods:
 - Clicking the URL given and follow the instructions.
 - Scanning the QR code under **[Visits]**.
3. Guest can now use the Bluetooth Key under **[Visits]** whenever he is within range of the lock.

Notes:

- The owner can revoke the Bluetooth Key in App.
- Bluetooth Key must be accepted within 1 hour generation before it expires.

3 Resetting PIN codes

Ensure that Bluetooth is switched on, and you are within Bluetooth range of the lock.

Go to Home > Select Lock Name > **[Settings]** > Reset Pins

Lock will reset all codes, except for Master PIN, and all PIN codes previously generated are no longer valid.

Can I create temporary PIN codes?



Modified on: Wed, 1 Nov, 2017 at 5:21 PM

Yes, they can be generated remotely via the igloohome app as long as there is internet connection on your phone.

<https://igloohome.freshdesk.com/support/solutions/articles/35000013956-can-i-create-temporary-pin-codes->.

What types of access codes can I set?



Modified on: Thu, 7 Feb, 2019 at 5:32 PM

You can create PIN and Bluetooth keys for friends, family or other visitors.

The igloohome app allows you to generate 3 types of PIN codes and bluetooth keys:

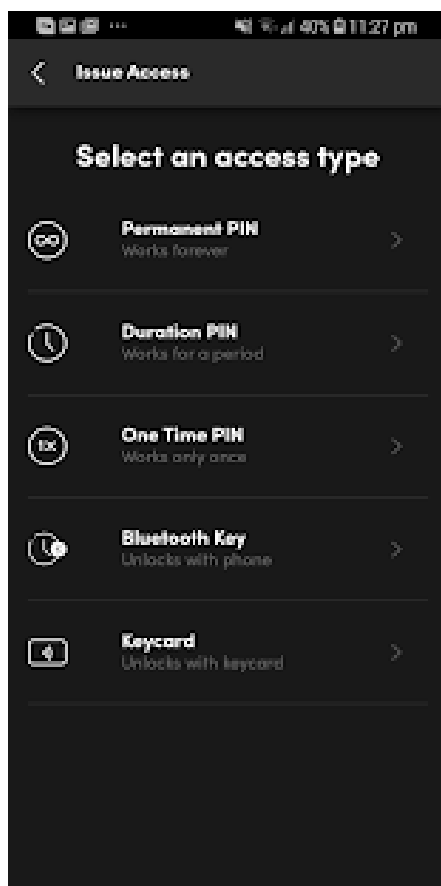
One-Time PINs must be used within 6 hours after creation

Permanent PINs must be used within 24 hours after creation

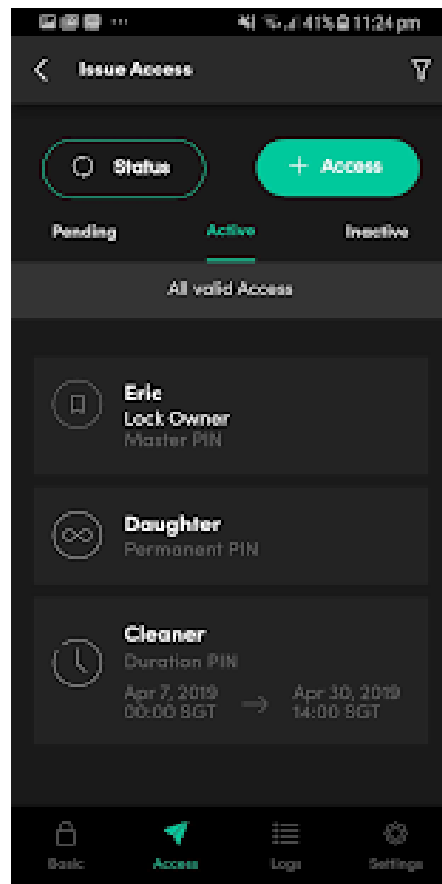
Duration PINs must be used within 24 hours of start time

Bluetooth keys must be used within one hour after creation

<https://igloohome.freshdesk.com/support/solutions/articles/35000013989-what-types-of-access-codes-can-i-set->.



<https://play.google.com/store/apps/details?id=com.igloo.home&hl=en>.



Id

The igloohome app allows users to manage their igloohome smart locks or igloohome smart keyboxes. Grant visitors access to your home or property from any time and place. Through the igloohome app, you can send a PIN code or Bluetooth key to anyone via email/SMS/Whatsapp/other communication platforms, for the duration that you select. Through the igloohome mobile app, you can also check the access logs to see who and when someone has entered your property.

Id.

Access at your fingertips

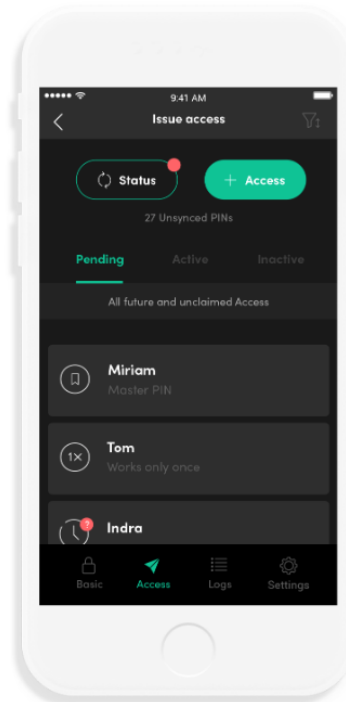
All igloohome devices work with the igloohome mobile app. You can manage access to your property anytime, anywhere.

Grant access anytime, anywhere.

Via the mobile app, you can send PIN codes and Bluetooth keys from wherever you are. Our unique AlgoCode technology makes this possible, so you don't have to be near the Deadbolt to grant access to those who need it.

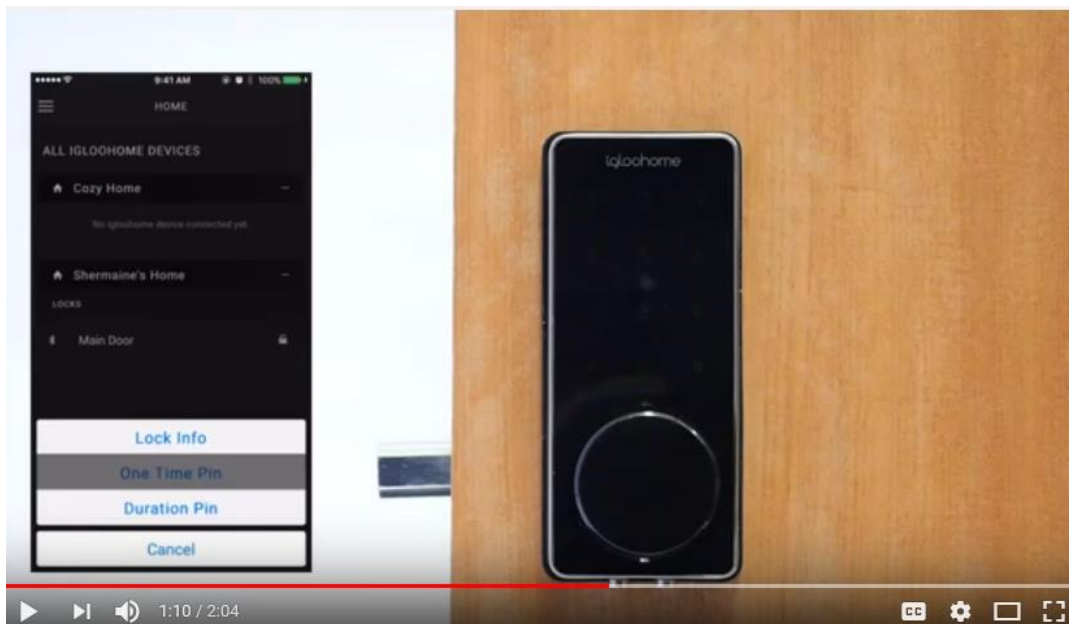
Greater peace of mind.

Unlike conventional locks, the igloohome mobile app allows you to track dates and times at which visitors enter your home. Activity logs provides greater visibility for a greater peace of mind.

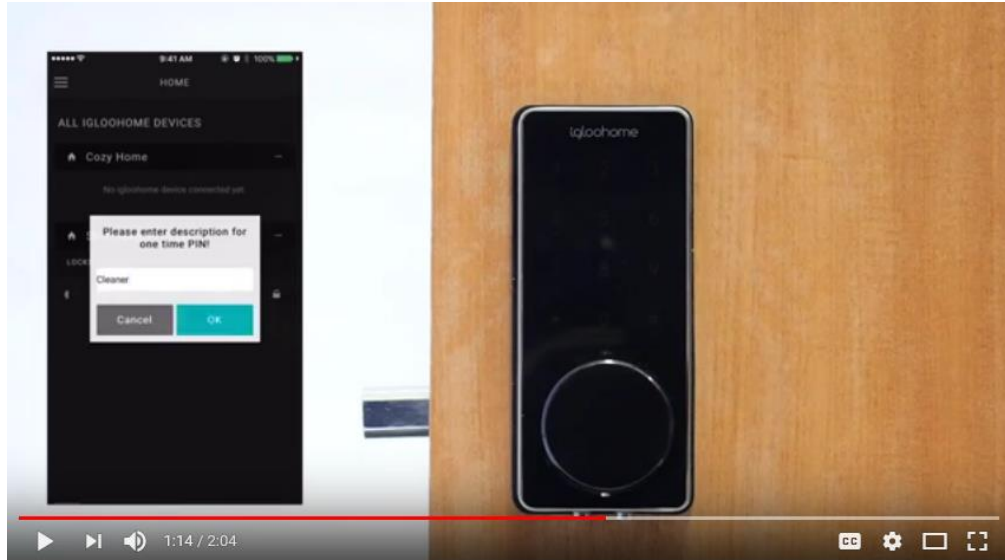


<https://www.igloohome.co/deadbolt-2s>.

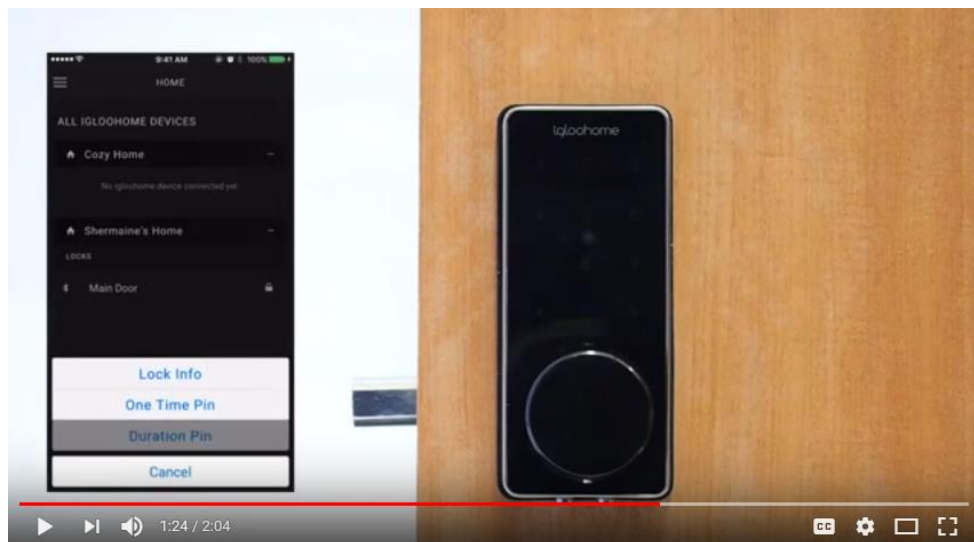
17. The access code includes identification information to indicate who accessed the locking mechanism.



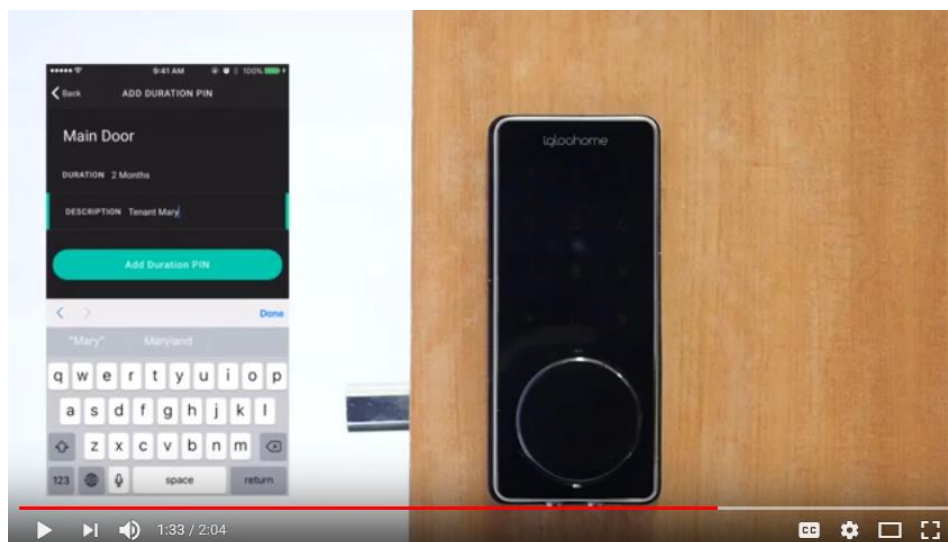
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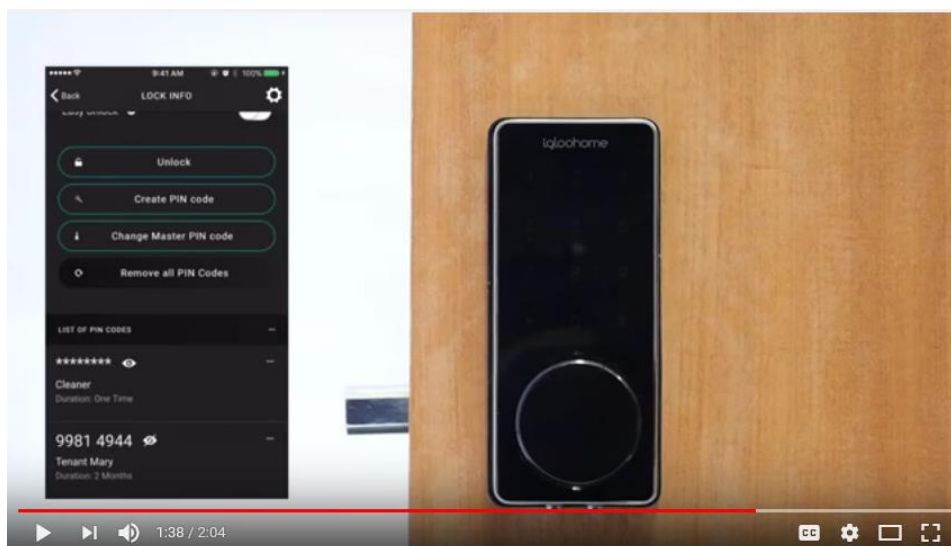
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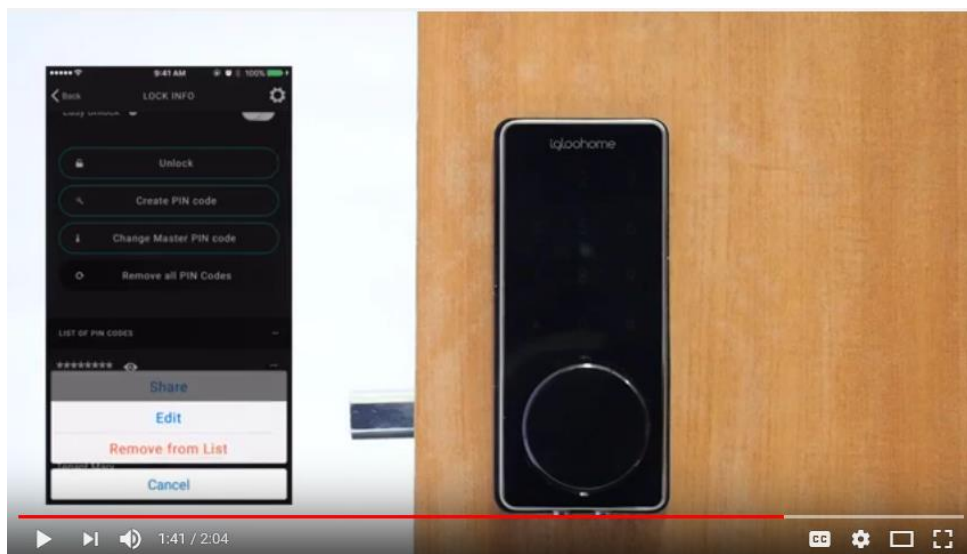
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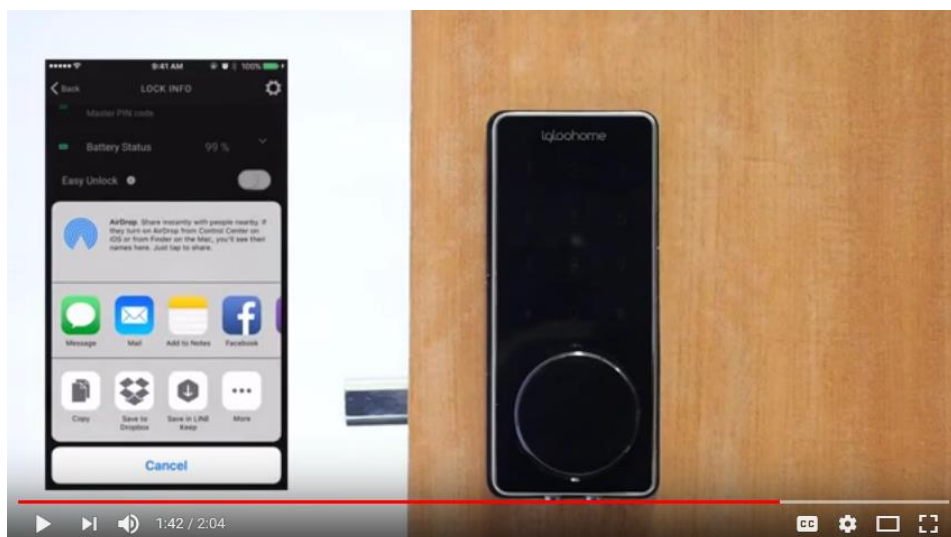
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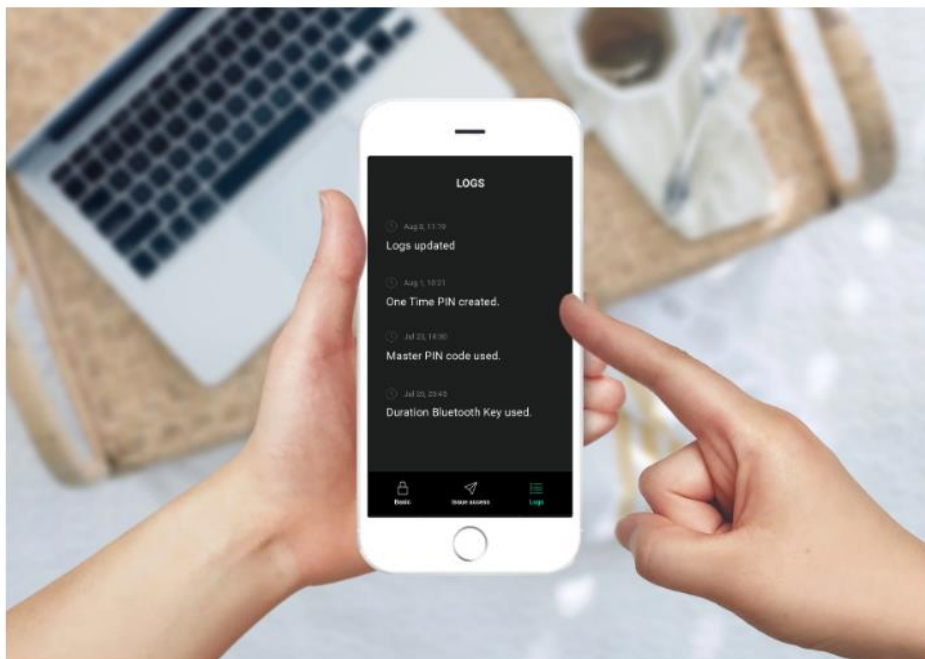
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<https://youtu.be/o0ec9foAPyY?t=101>.



<https://youtu.be/o0ec9foAPyY?t=102>.



View Access Logs

Track the dates and times at which visitors enter your home. Greater visibility on access brings you greater peace of mind. Bluetooth key access logs are updated in real time, and PIN code access logs are updated when the master owner uses a bluetooth key.

https://www.igloohome.co/products/deadbolt-2s/?_ga=2.138503479.520391978.1555300236-562153576.1554518717.

Greater peace of mind.

Unlike conventional locks, the igloohome mobile app allows you to track dates and times at which visitors enter your home. Activity logs provides greater visibility for a greater peace of mind.

Safeguard your home

Choose from One-Time, duration or permanent PIN codes. Time-sensitive access ensures that your home will always be kept safe. You can also view activity logs to see who, when and how the Deadbolt was unlocked.

*PIN code logs are updated when the master owner unlocks the Padlock via a Bluetooth key. Bluetooth access are updated in real-time.

<https://www.igloohome.co/deadbolt-2s>.

18. Smart Deadbolt 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.

Will I be notified if someone enter my house/property?

Modified on: Thu, 28 Jun, 2018 at 11:10 AM



Yes. You could monitor activities of your lock via the Access logs.

To access your activity logs,

1. Go to '**Home**'
2. Click on your Deadbolt 2S
3. Click on the '**Logs**' to access the activity log. (Bottom right corner of the page).

Activities will be updated in real time when guests uses a Bluetooth key for access and owners will immediately receive notifications whenever a Bluetooth Key is used.

Pin-code entries, however, will only be updated when master uses the Bluetooth Key on the lock.

<https://igloohome.freshdesk.com/support/solutions/articles/35000079551-will-i-be-notified-if-someone-enter-my-house-property->.

Are there igloohome app push notifications when someone enters my house/property?

Modified on: Thu, 28 Jun, 2018 at 12:57 PM



In-app notifications are available for any Bluetooth Key activities. These **will be sent in real time** when guests uses a Bluetooth key for access. Owners will immediately receive notifications whenever a Bluetooth Key is used.

However, Pin-code and key card entries will only be updated when the owner uses the Bluetooth Key on the lock.

You can monitor activities of your lock via the Access logs. Go to **Lock Info > Activity log** (tap on the icon at the top right hand corner of the page)

Note: Key card access logs are only available for the Mortise lock.

<https://igloohome.freshdesk.com/support/solutions/articles/35000014130-are-there-igloohome-app-push-notifications-when-someone-enters-my-house-property->.

Can I monitor the entry activities of my guests?



Modified on: Thu, 7 Jun, 2018 at 4:47 PM

This depends on the entry modes of your guests.

1. Bluetooth keys: Owners will be notified whenever guest uses a Bluetooth key to unlock the lock.
2. Pin-codes: Pin-code entries will not send notification to owner whenever it is used. Owners can only view the updated logs when someone uses the Bluetooth Keys to unlock.

<https://igloohome.freshdesk.com/support/solutions/articles/35000079559-can-i-monitor-the-entry-activities-of-my-guests->.

The igloohome app allows users to manage their igloohome smart locks or igloohome smart keyboxes. Grant visitors access to your home or property from any time and place. Through the igloohome app, you can send a PIN code or Bluetooth key to anyone via email/SMS/Whatsapp/other communication platforms, for the duration that you select. Through the igloohome mobile app, you can also check the access logs to see who and when someone has entered your property.

<https://play.google.com/store/apps/details?id=com.igloo.home&hl=en>.

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.

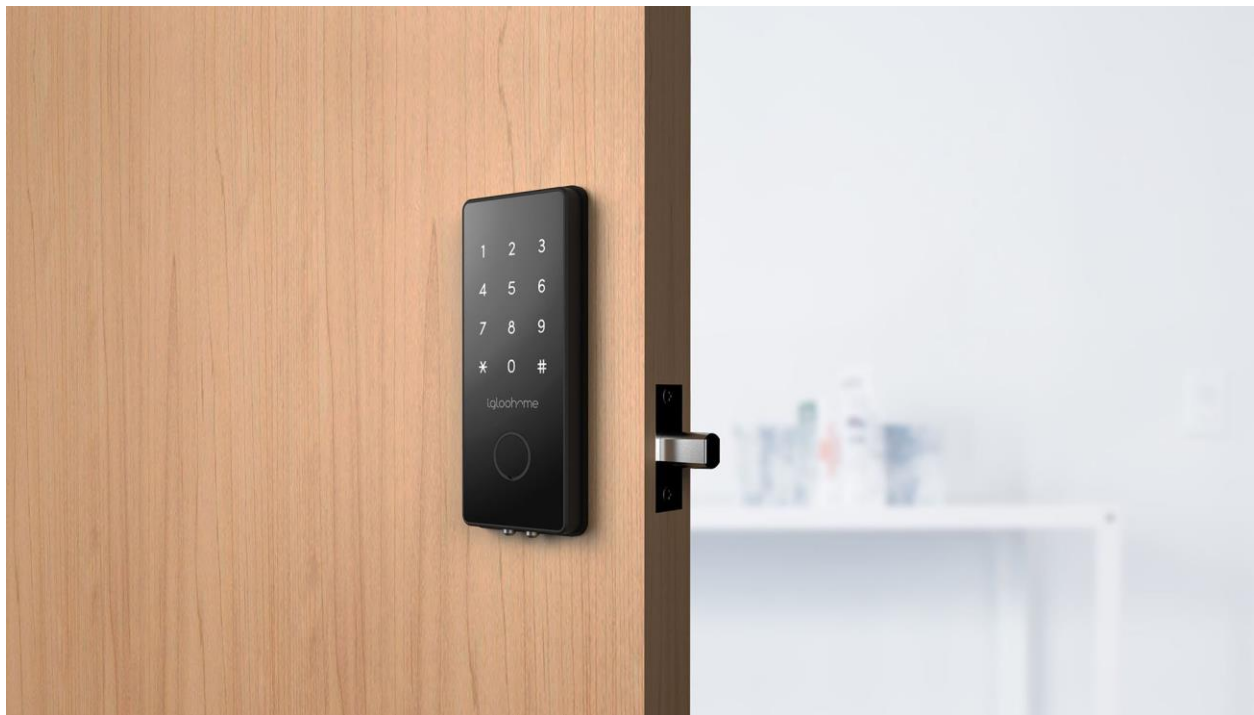
21. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of at least claim 36 of the '873 patent by making, using, importing, offering for sale, and/or selling systems and methods for operating a mobile communication device

associated with a user, including, but not limited to, Deadbolt 2S ("Smart Deadbolt"), because each and every element is met either literally or equivalently.

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

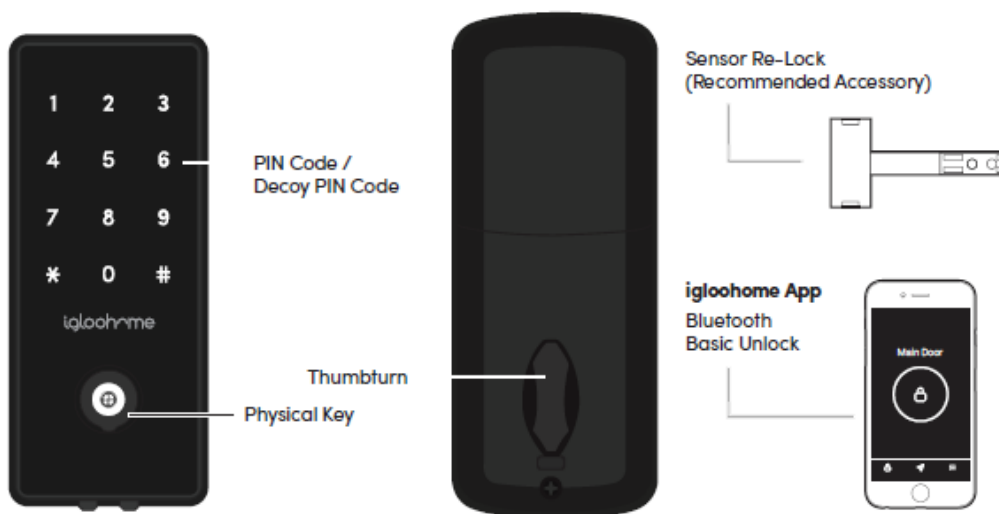
23. For example, to create its video "igloohome Smart Deadbolt || Official Video" (available at <https://youtu.be/Kwuxk7XPrEM>), Defendant used the Smart Deadbolt.

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



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Unlocking & Locking



Unlocking



PIN Code

Key in your PIN code and press '#'



Bluetooth Guest Key

Refer to page 23



Bluetooth Basic Unlock

On your app, click on the Bluetooth Unlock button and tap on your lock



Physical Key

Use the physical key to unlock the door



Thumbturn

Use thumbturn at the back of lock

Locking



'#' Key

Press and hold '#'



Physical Key

Use the physical key to lock the door



Timer Re-Lock

Refer to page 24



Thumbturn

Use thumbturn at the back of lock



Sensor Re-Lock (Recommended Accessory)

Automatic locking after door closes

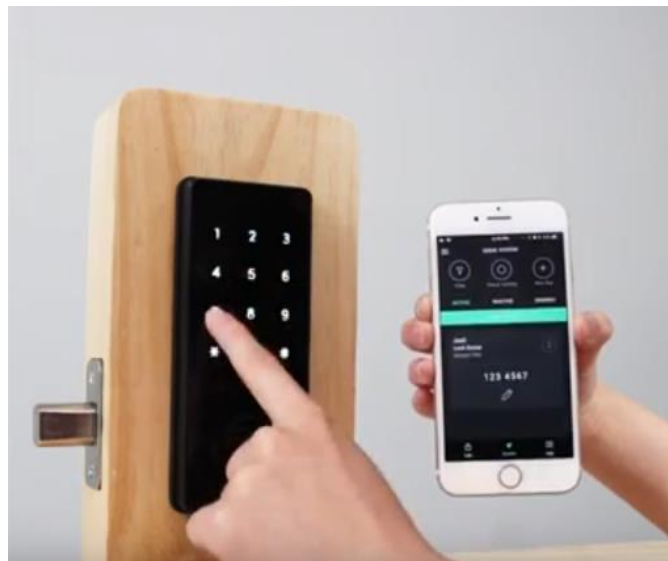
25. Smart Deadbolt includes an actuator configured to unlock in response to entry of an authorized access code.

To unlock your door with a PIN, simply touch your palm over the keypad of the lock to wake it up. Key in your PIN code, followed by '#'.

Each lock comes with a Master PIN which can be changed on the app (between 7-9 digits).

You can also generate and manage PIN codes with your igloohome mobile app.

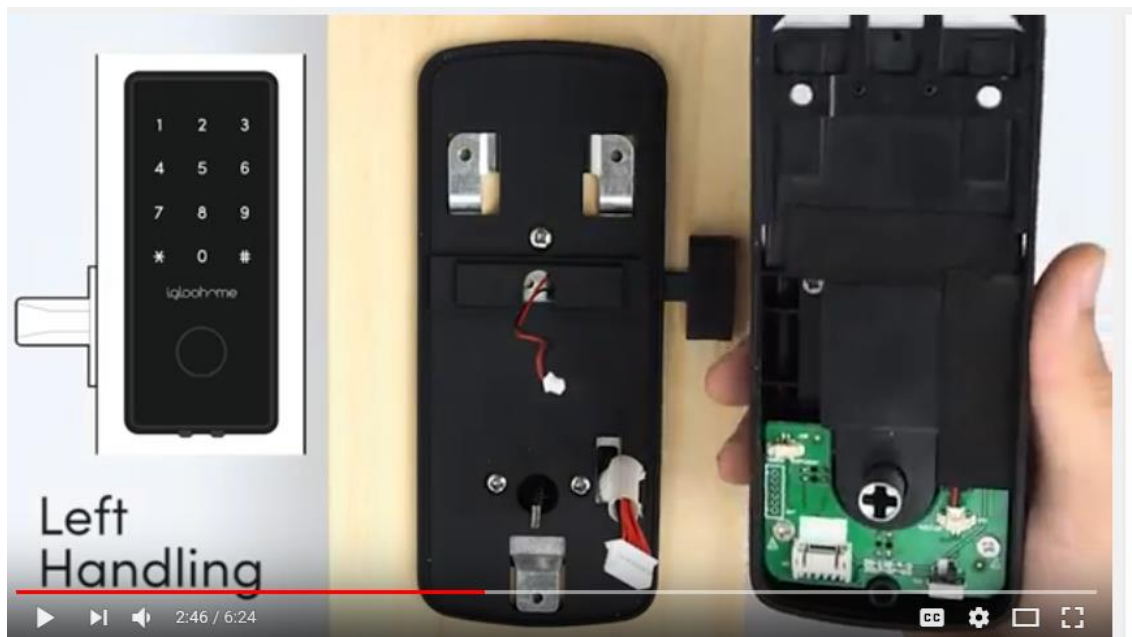
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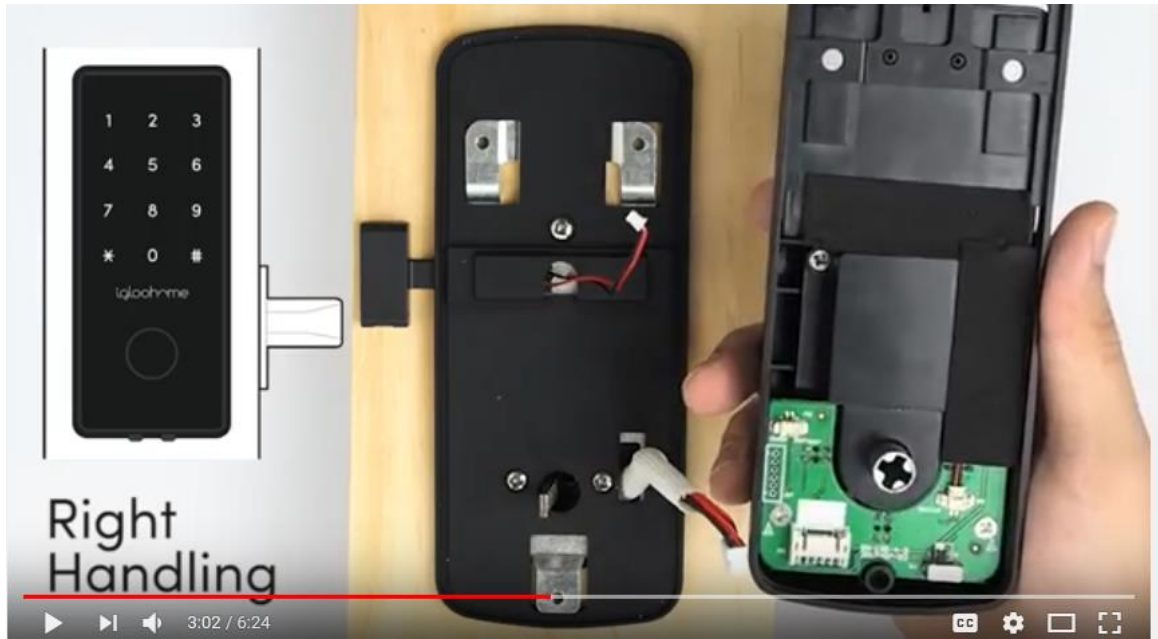
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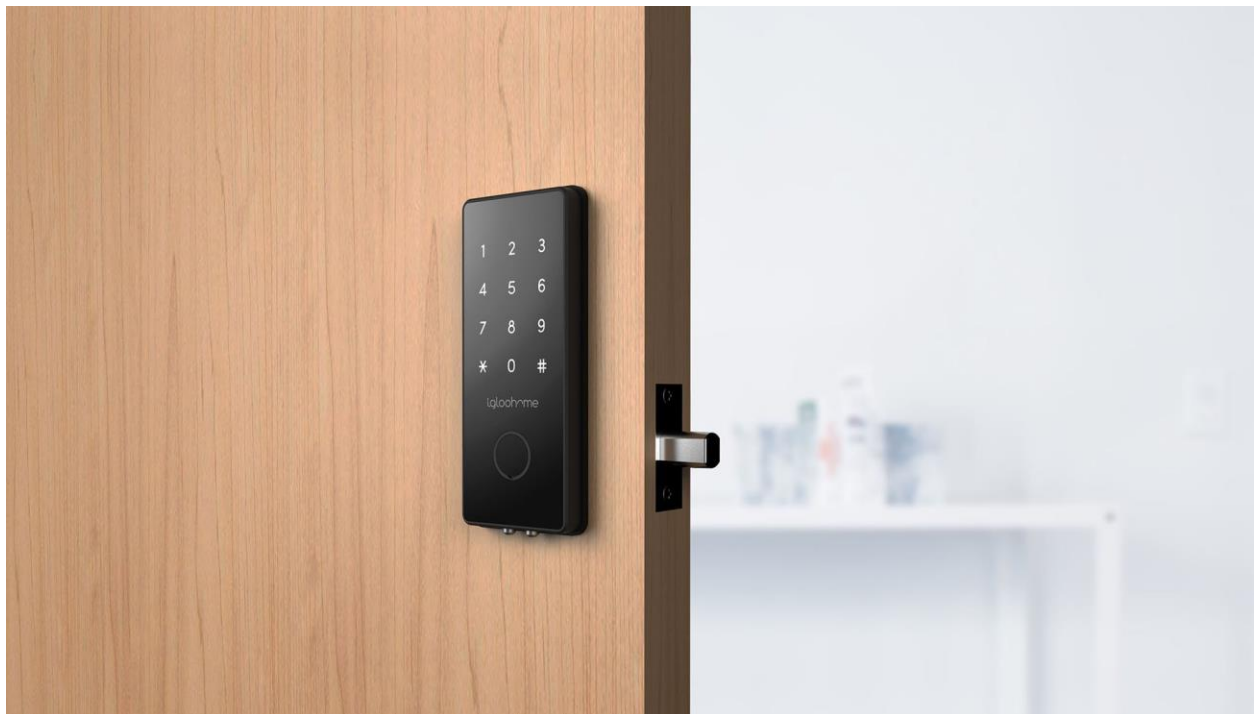


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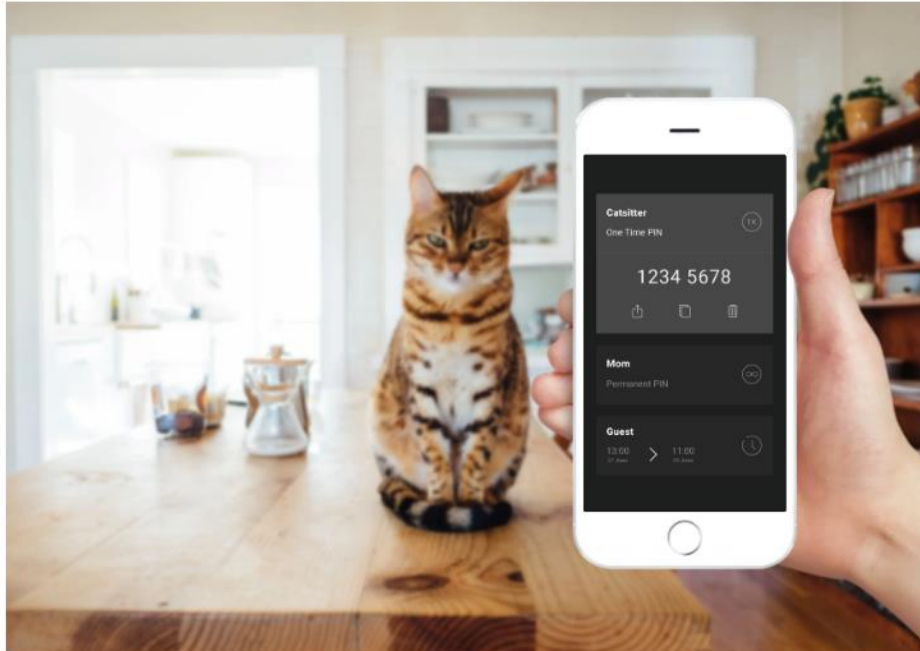


https://youtu.be/PHZkBdq3_WY?t=182.

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



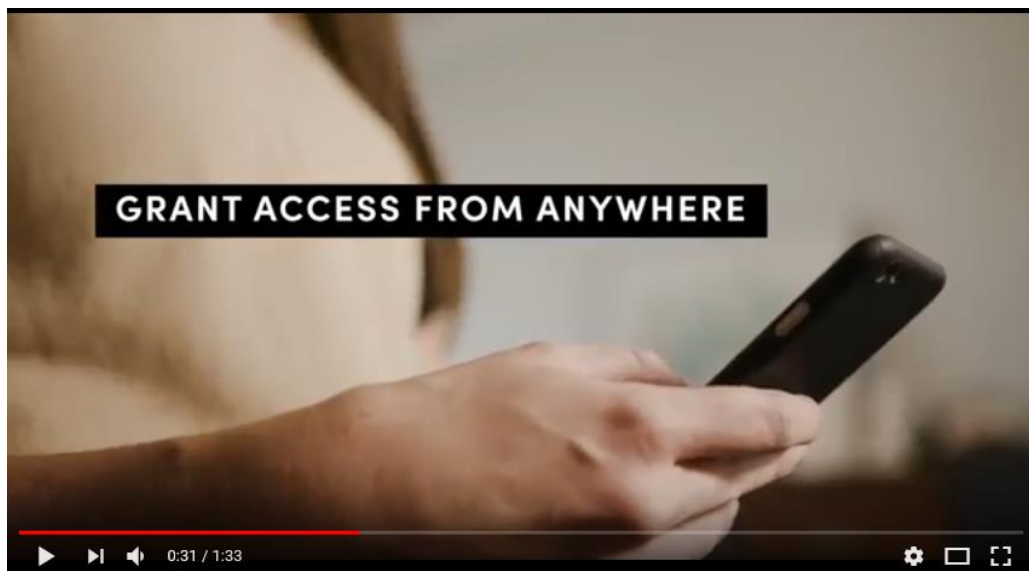
<https://www.igloohome.co/products/deadbolt-2s/>.



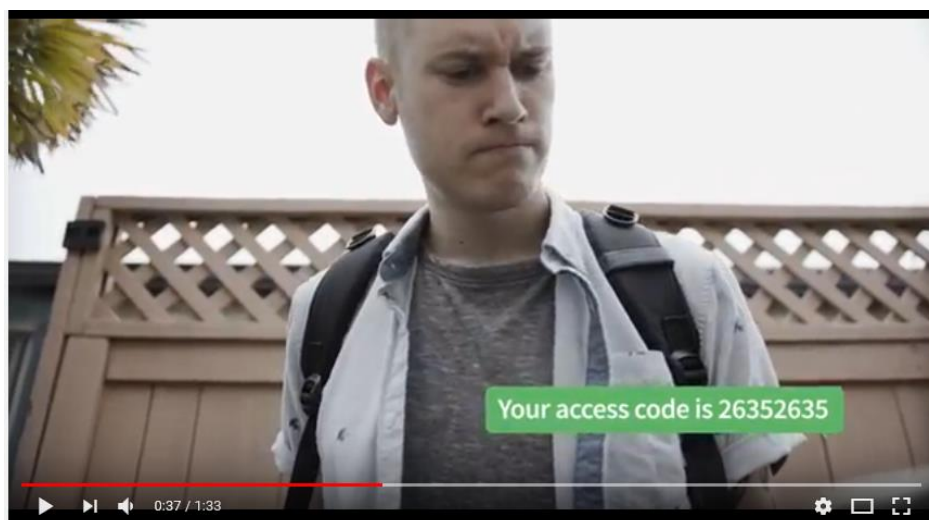
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<https://youtu.be/Kwuxk7XPrEM?t=40>.



<https://youtu.be/Kwuxk7XPrEM?t=46>.

I am a guest. How do I unlock the door?



Modified on: Thu, 7 Feb, 2019 at 4:16 PM

If you are a guest, your host would have provided you with one of the following methods of entry:

PIN code

- The PIN code is a series of numbers that you can key into the igloohome smart lock.
- After keying in your PIN, press the # key to unlock (Key icon for Latch Model).
- Depending on the type of PIN code your host has given you, it may expire.

Bluetooth Unlock

- Open the igloohome app and login
- Go to Visits under the Menu, and you will be able to view your Bluetooth Key(s).
- Click on the Bluetooth Key icon to unlock.
- Make sure that you have a strong Bluetooth and Internet connection on your phone.

<https://igloohome.freshdesk.com/support/solutions/articles/35000013987-i-am-a-guest-how-do-i-unlock-the-door->.

Managing Access in App

1 Creating PIN codes

PIN codes can be generated on the app under **[Access]**, create **[New Key]** and choose either One-Time, Permanent or Duration PIN.

Pin codes will expire if its not use within its activation period. Refer to the table below.

| PIN Type | Use PIN within* |
|---------------|---------------------------|
| One-Time PIN | 6 hrs of generation |
| Permanent PIN | 24hrs of generation |
| Duration PIN | 24hrs from the start time |

2 Bluetooth Guest Key

Bluetooth Guest Key can be shared with other users for mobile access. It allows your guests to unlock the igloohome smart lock via Bluetooth.

There are 3 steps to using a Shared Bluetooth Key

1. Under **[Access]**, create **[New Key]** and choose **[Bluetooth Key]** under **[Access Type]**. Proceed to share the key after it is created.
2. Guest receives the Bluetooth Key by one of these methods:
 - Clicking the URL given and follow the instructions.
 - Scanning the QR code under **[Visits]**.
3. Guest can now use the Bluetooth Key under **[Visits]** whenever he is within range of the lock.

Notes:

- The owner can revoke the Bluetooth Key in App.
- Bluetooth Key must be accepted within 1 hour generation before it expires.

3 Resetting PIN codes

Ensure that Bluetooth is switched on, and you are within Bluetooth range of the lock.

Go to Home > Select Lock Name > **[Settings]** > Reset Pins

Lock will reset all codes, except for Master PIN, and all PIN codes previously generated are no longer valid.

Can I create temporary PIN codes?



Modified on: Wed, 1 Nov, 2017 at 5:21 PM

Yes, they can be generated remotely via the igloohome app as long as there is internet connection on your phone.

<https://igloohome.freshdesk.com/support/solutions/articles/35000013956-can-i-create-temporary-pin-codes->.

What types of access codes can I set?



Modified on: Thu, 7 Feb, 2019 at 5:32 PM

You can create PIN and Bluetooth keys for friends, family or other visitors.

The igloohome app allows you to generate 3 types of PIN codes and bluetooth keys:

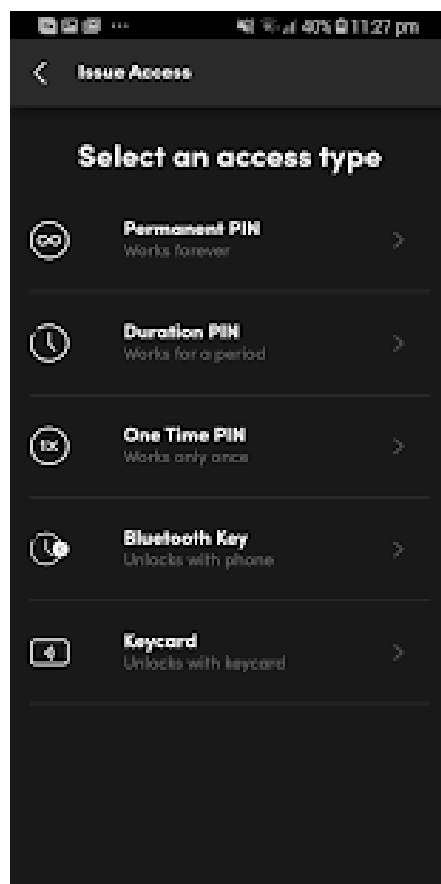
One-Time PINs must be used within 6 hours after creation

Permanent PINs must be used within 24 hours after creation

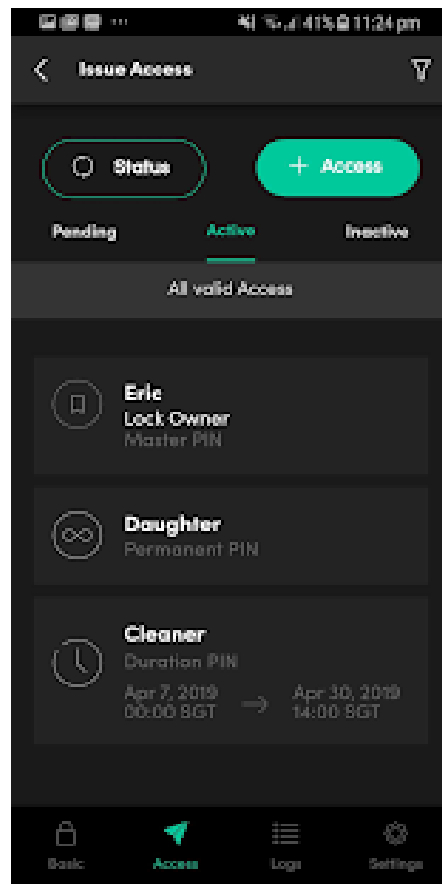
Duration PINs must be used within 24 hours of start time

Bluetooth keys must be used within one hour after creation

<https://igloohome.freshdesk.com/support/solutions/articles/35000013989-what-types-of-access-codes-can-i-set->.



<https://play.google.com/store/apps/details?id=com.igloo.home&hl=en>.



Id

The igloohome app allows users to manage their igloohome smart locks or igloohome smart keyboxes. Grant visitors access to your home or property from any time and place. Through the igloohome app, you can send a PIN code or Bluetooth key to anyone via email/SMS/Whatsapp/other communication platforms, for the duration that you select. Through the igloohome mobile app, you can also check the access logs to see who and when someone has entered your property.

Id.

Access at your fingertips

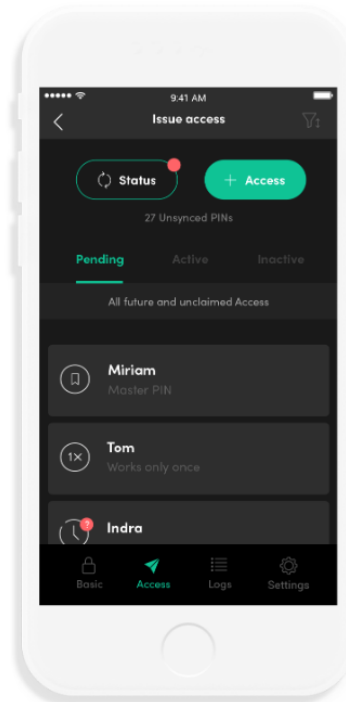
All igloohome devices work with the igloohome mobile app. You can manage access to your property anytime, anywhere.

Grant access anytime, anywhere.

Via the mobile app, you can send PIN codes and Bluetooth keys from wherever you are. Our unique AlgoCode technology makes this possible, so you don't have to be near the Deadbolt to grant access to those who need it.

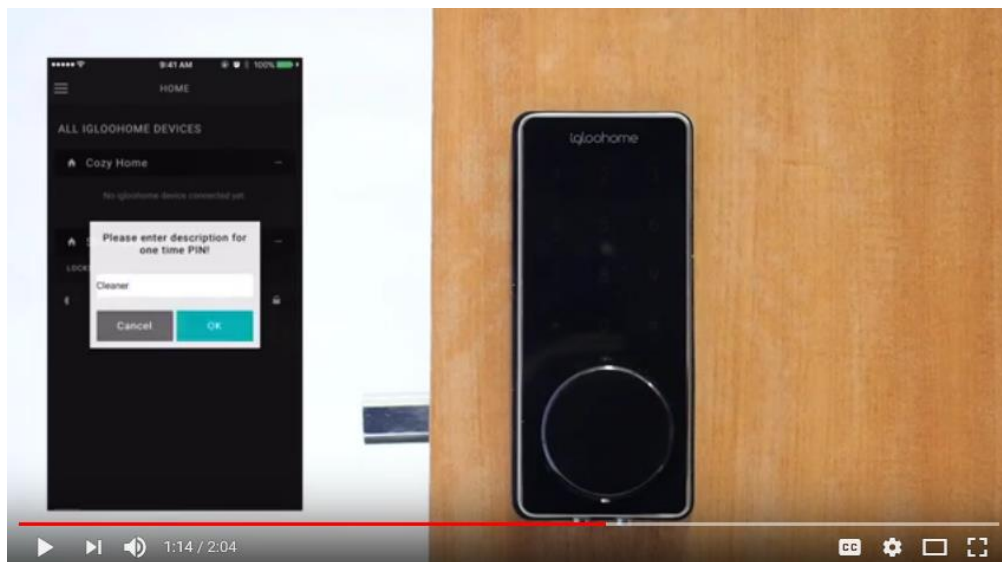
Greater peace of mind.

Unlike conventional locks, the igloohome mobile app allows you to track dates and times at which visitors enter your home. Activity logs provides greater visibility for a greater peace of mind.

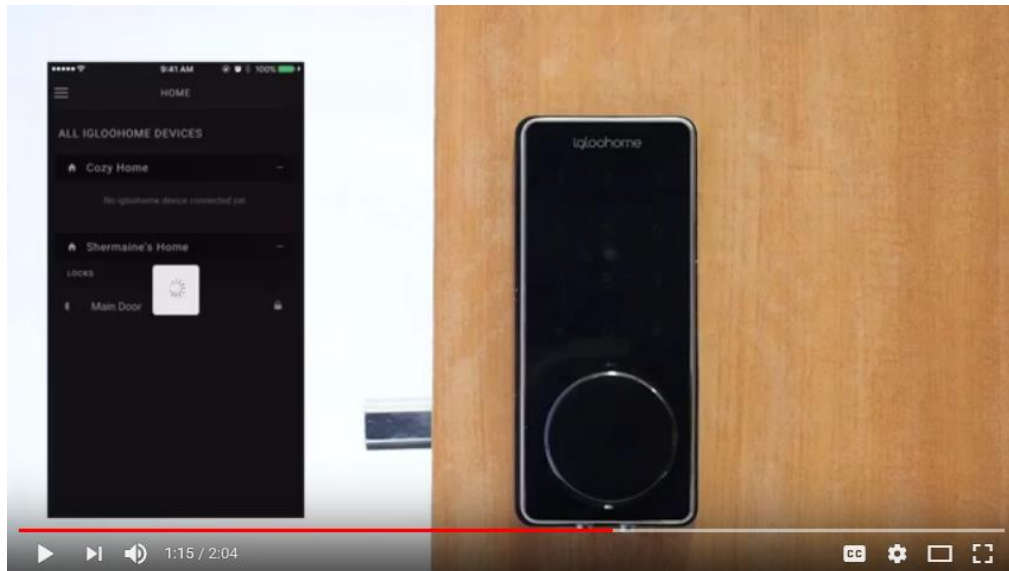


<https://www.igloohome.co/deadbolt-2s>.

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



<https://youtu.be/o0ec9foAPyY?t=74>.



<https://youtu.be/o0ec9foAPyY?t=75>.

How do I create PIN codes?

 Print

Modified on: Wed, 1 Nov, 2017 at 5:20 PM

PIN codes can be generated on the app in 2 ways:

1. On the **Home screen**, click on the lock name and select either One Time, Permanent or Duration PIN.
2. On the **Lock Info page**, go to the PIN tab (second icon on the bottom tray), click on the "Add" icon, and select your desired PIN code type.

<https://igloohome.freshdesk.com/support/solutions/articles/35000013836-how-do-i-create-pin-codes->.

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

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