

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

CIRCUIT VENTURES LLC,	§	
	§	
Plaintiff,	§	Case No: 1:19-cv-00856-MN
	§	
vs.	§	
	§	
ALARM.COM HOLDINGS, INC.	§	
dba LINK INTERACTIVE,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	
	§	

**FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Circuit Ventures LLC (“Plaintiff” or “CV”), by and through its attorneys, files this First Amended Complaint against Alarm.com Holdings, Inc. dba Link Interactive (“Defendant” or “Link Interactive”) for infringement of United States Patent Nos. 7,834,744 (“the ‘744 Patent”); 8,816,869 (“the ‘869 Patent”); and 8,912,893 (“the ‘893 Patent”).

**PARTIES AND JURISDICTION**

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Delaware LLC, with an office address of 825 Watters Creek Blvd., Building M, Suite 250, Allen, TX 75013.

4. Upon information and belief, Defendant is a Delaware corporation with a place of business located at 8281 Greensboro Drive, Suite 100, Tysons, VA 22101. 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. 7,834,744)**

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 '744 Patent with sole rights to enforce the '744 Patent and sue infringers.

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

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

12. The claims of the '744 Patent recite a flexible system that can reproduce the function of a typical security management system. '744 Patent, 3:26-28. 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.*, 1:31-39. 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.*, 2:18-20. The problems with typical systems are especially apparent when an owner needs to upgrade or modify their system. *Id.*, 2:39-50.

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.*, 2:40-50. And, typical systems include an operator interface which is proprietary and cannot be changed by the user. *Id.*, 2:51-57. The system claimed in the '744 Patent allows for the retrofit of existing security management systems while using the existing circuitry wiring of the typical legacy system. *Id.*, 21-28.

13. Claim 1, for example, recites:

An apparatus for monitoring a circuit and for coupling to a central system comprising:

a circuit module to determine the status of the circuit;

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; and

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.

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

15. 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. 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.” ‘744 Patent, 7:12-19; see also *Id.*, 7:30-49 and 7:51-63.

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.*, 8:37-43. Thus, the ‘744 Patent specification clarifies that the claimed components, performing the claimed functionality, are not conventional or generic.

16. 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.

17. 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.

18. 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, which are 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.

19. 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.

20. 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 a Home Security and Home Automation System (such as Home Security Cameras, DIY Home Security, Wireless Home Security, Alarm Chat, Home Automation Control and/or Z Wave Home Automation) for monitoring at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.). Link Interactive also provides central alarm control panels ("central system") (such as Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote) which couples to the sensor using wireless network (such as GSM cellular, BLE 4.2, Wi-Fi and/or Z-Wave). 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.



### Build Your Own Security Package

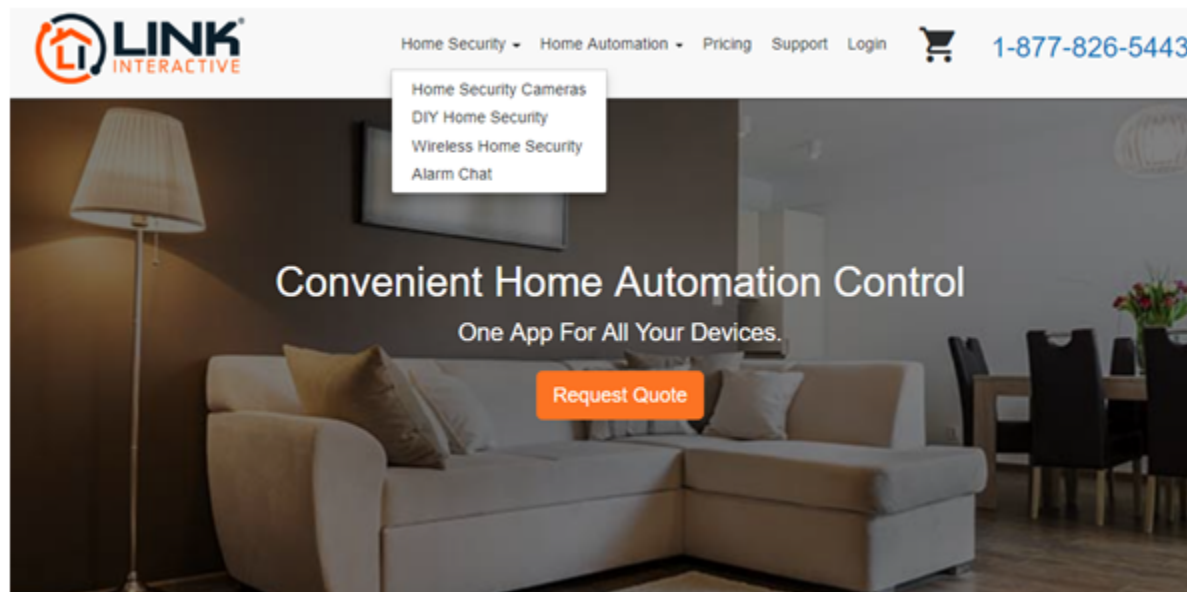
#### DIY Home Security Systems

According to the latest statistics from the FBI, a burglary occurs somewhere in the United States every 14.6 seconds. Today's criminal has become more and more adept at entering homes and quickly finding your most valuable and precious belongings. Protect yourself against crime by installing a security system from Link Interactive. Featuring 24/7 central-station monitoring and cellular-based automation.

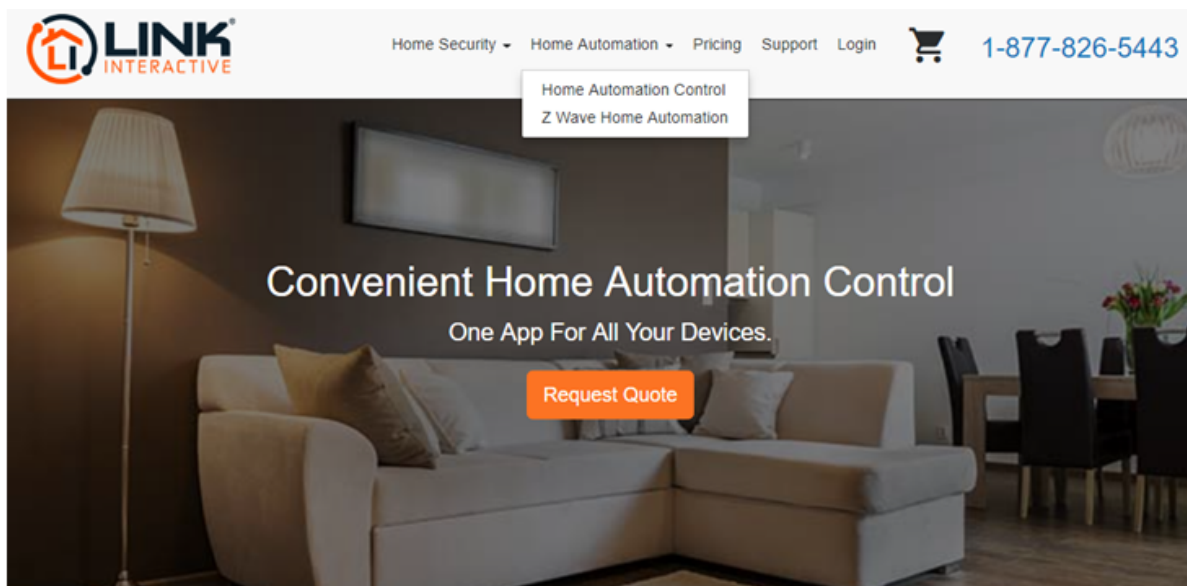
Here you will find all the necessary equipment and technology to keep your loved ones and possessions safe. Take control of your home's safety today with the help of Link Interactive.



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



Source: <https://www.linkinteractive.com/home-automation/home-automation-control/>



Source: <https://www.linkinteractive.com/home-automation/home-automation-control/>



Home Security • Home Automation • Pricing Support Login



1-877-826-5443

## DIY Security Equipment

Link Interactive offers you the flexibility to customize your own diy home security system to match your specific needs and budget. You'll find affordable security products that have attained the highest level of reliability. Put yourself in control of your home's safety today with the help of Link Interactive.

We offer the highest quality in customer support before, during and after the self-installation process via live chat, phone, email, skype, and easy-to-follow installation videos. Save yourself time and money with a security company that's been in business since 1952 and carries an A+ rating from the Better Business Bureau.

### Which Type of Security Products Are You Looking For?



Home Security



Life Safety



Home Automation



Cameras



Add Ons

### Build A Custom Security System



### Put Together A Security/Home Automation System That Fits Your Needs

This option lets you select from all of our components to build a customized option perfect for your home or small business.

[Start Customizing](#)

### Popular Security Systems for your Home



GoControl Alarm Panel

The Future of residential home security and home management is NOW! With the GoControl alarm panel, you get an all-in-one security system with home management.



PANIC1 Wireless Remote Panic Button

The wireless water-resistant panic button is completely portable and comes with a necklace cord, wristband and belt clip. The pendant may be used anywhere, even in the shower!



2GIG Indoor HD Camera

This indoor camera includes IR LEDs for viewing in low-light conditions and incorporates PIR with video motion detection (VMD) to reduce false motion-detection events.

Source: <https://www.linkinteractive.com/home-security/diy-home-security/>





## Life Safety Products

Be alerted and ready for any fires or home disasters with the life safety equipment offered by Link Interactive. We offer a selection of smoke sensors, heat detectors, carbon monoxide sensors, and more which can all be integrated into Alarm.com's cloud service, allowing you to control and monitor every component of your family's safety from one central control center.

### Component Categories

- Home Security
- Life Safety
- Home Automation
- Cameras
- Add Ons



### Smoke/Heat/Freeze Sensor

The wireless Smoke/Heat/Freeze Sensor, 2GIG's next generation in fire and freeze protection, offers smoke detection, heat detection, and freeze detection. It is more customizable than previous models by allowing separation of the smoke, heat, and freeze features enabling the alarm to detect one, two, or all three.

[Learn More >](#)



### Heat Detector

The sensor will send a signal if it senses an increase of 15 or more degrees per minute, and will also signal if the environmental temperature reaches 135 degrees.

[Learn More >](#)

### Disaster Sensor

Three Qolsys compatible wireless sensors in one! It detects flood, heat, and freeze situations.

[Learn More >](#)



### FireFighter Module

The 2Gig FireFighter is a quick and easy way to add smoke alarm monitoring to your 2Gig control panel. FireFighter is specifically tuned to recognize the specific cadence of a UL listed smoke detector's alarm. This unique audio technology monitors existing UL listed hard wired smoke detectors in a home and will send a wireless signal to the control panel when an alarm is detected. The control panel will then contact the central monitoring station. When used with the interconnected smoke detector found in most

Source: [https://www.linkinteractive.com/product\\_cat/life-safety/](https://www.linkinteractive.com/product_cat/life-safety/)



## Home Security Products

Protect your family and home with Link Interactive's wide selection of wireless DIY home security equipment. Install motion sensors, window, and door sensors to be alerted if anyone is entering your home. Access and manage all your security equipment from one central alarm control panel. Instantly get alerts for shattering glass with our wireless glass break sensor. Other home security equipment that Link Interactive offers include panic buttons, and much more. Start building up your home security with equipment from Link Interactive today.


- Component Categories
- Home Security
  - Life Safety
  - Home Automation
  - Cameras
  - Add Ons



### Smart Home Panel

The 2GIG GoControl panel packs high-tech wireless technology into a compact, user friendly unit for the DIY homeowner. Full voice response, quick access emergency buttons and multiple arming options maximize your security needs, while the convenience of an interactive panel, home automation, remote access and over the air software updates keep you continuously on top of technology. By maximizing the features, you can turn off the alarm system prior to the kids arriving home from school, be notified when they arrive home, keep the medicine cabinet armed even when the rest of the home is unarmed, and know by user code who is arming and disarming the system. The functionality of the GoControl panel seems to be endless once you see how easy it is to customize the panel to get the information you desire.

[Learn More >](#)



### Key Ring Remote

The key ring remotes are small, portable touchpads which allow you to conveniently arm and disarm your security system or to initiate a panic alert. Consider ordering additional units to give one to each family member, trusted neighbor or your cleaning service! Each remote is uniquely identified by the security system and you may have up to eight remotes on your alarm system.

[Learn More >](#)



### Secondary Keypad

The wireless remote keypad gives you the ability to arm and disarm your system, along with two 24/7 emergency buttons. For use in the master bedroom, frequently used exit doors or anywhere in the home where you want the capability of controlling your security alarm.

[Learn More >](#)



### Secondary Touchpad

The wireless touch screen keypad is an excellent addition to any 2GIG system, enabling you to more conveniently access and control your home security and home automation devices from any room in your house.

[Learn More >](#)

Source: [https://www.linkinteractive.com/product\\_cat/home-security/](https://www.linkinteractive.com/product_cat/home-security/)

## Dedicated Communication

Dedicated and secure cellular communication provides safe and reliable uninterrupted protection – even if the phone, internet or broadband is down.

Reliable & fast cellular communication, no landline needed.

In the event of a power outage, your system will operate on backup battery power for 24 hours so you stay secure.

Safe for critical security messages – not shared with internet, entertainment or phone lines.



## Tamper-Resistant

Alarm.com withstands common vulnerabilities to keep you protected when you need it most.

Patented Crash & Smash technology ensures that your system works even if the security panel is damaged before it can send a signal, or the phone line is cut.

Secure cellular communication is not impacted by damaged phone, internet or broadband lines that can be cut from the outside.

Source: <https://www.linkinteractive.com/home-automation/z-wave-home-automation/>

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## Awareness & Control Wherever You Go

Unlike traditional systems that only alert you in an alarm event, Alarm.com lets you know what's happening at your property at any time – whether your system is armed or not. And with our mobile app, you can check in anytime and arm and disarm your system remotely wherever you go.



## Mobile App

Stay in control of your system at all times. Our top rated, easy to use mobile app puts your home in your hands. You can arm and disarm your system, and check the arming status at any time.

## Instant Alerts

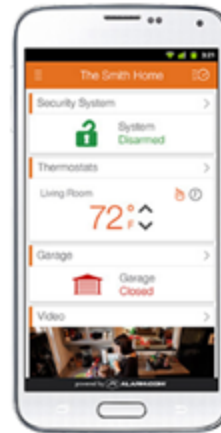
Get real-time notifications by text or email to know what's happening at home, the moment it happens. Choose to receive alerts via text, push notification, email or phone call.

## Personalized User Codes

Create unique user codes for your family and visitors, and know who's coming and going, and who armed or disarmed the system. Enable or disable codes at any time.

## History

Look back at activity over time or search for specific events. With our always-aware sensors and searchable event history, you can review any activity by sensor, type of event, date or time.



Source: <https://www.linkinteractive.com/home-automation/z-wave-home-automation/>

21. The infringing products provide a circuit module to determine a status of the circuit. For example, the Home Security and Home Automation System integrates with at least one of the sensors (“circuit module”) (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) to determine a status (such as motion, smoke and/or leakage of carbon monoxide) of the sensor. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

22. 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 Home Security and Home Automation System comprises a network communication module coupled with at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) to communicate a signal indicative of the assigned status (such as motion, smoke and/or carbon monoxide) to the central system via a wireless network (such as GSM cellular, BLE 4.2, Wi-Fi and/or Z-Wave). The communication module is dedicated to communicate with the central system to indicate the status of the signal from at least one of the sensor. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

The screenshot shows the LINK INTERACTIVE website. At the top, there is a navigation bar with links for Home Security, Home Automation, Pricing, Support, and Login, along with a shopping cart icon and the phone number 1-877-826-5443. The main content area features a product image of the 'Smart Home Panel' on the left. To the right of the image is the product title 'Smart Home Panel' and a descriptive paragraph. Below the paragraph is a blue button labeled 'Build Your Own Package >'. Underneath the product image, there are navigation tabs for 'Overview', 'Technical Specifications' (which is highlighted in blue), and 'Video'. To the right of these tabs is a red-bordered box containing a list of technical specifications.

**Smart Home Panel**

The 2GIG Go!Control panel packs high-tech wireless technology into a compact, user-friendly unit for the DIY homeowner. Full voice response, quick access emergency buttons and multiple arming options maximize your security needs, while the convenience of an interactive panel, home automation, remote access and over-the-air software updates keep you continuously on top of technology. By maximizing the features, you can turn off the alarm system prior to the kids arriving home from school, be notified when they arrive home, keep the medicine cabinet armed even when the rest of the home is unarmed, and know by user code who is arming and disarming the system. The functionality of the Go!Control panel seems to be endless once you see how easy it is to customize the panel to get the information you desire.

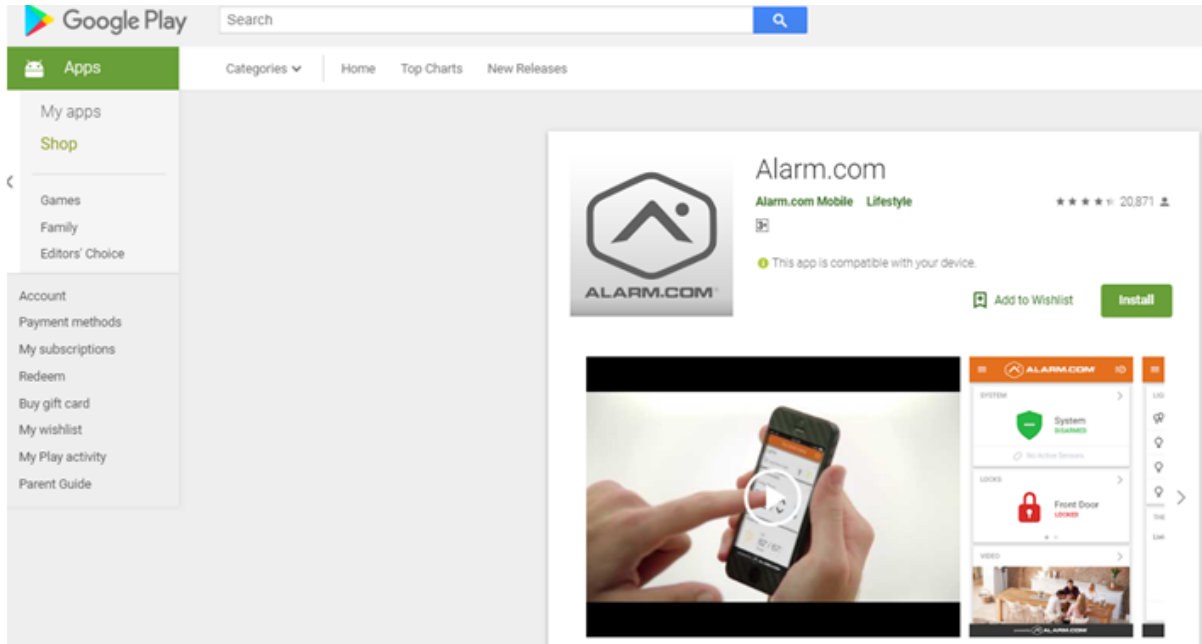
[Build Your Own Package >](#)

- 48 wireless zones
- Wired zones
- Wireless key ring remotes
- 345 MHz RF operating frequencies
- Wireless siren
- No tamper
- 24 hour standby backup power rating
- Individual zone monitor
- Control via call text messages
- Email / text messages of system activity
- GSM cellular support
- Wireless arm/disarm
- Built in wireless receiver
- Compliance to UL 1023 Household Burglar, UL 985 Household Fire Warn, ULC Listing ORD-C10239-74, ULC-5545-M89, SIA-CP01

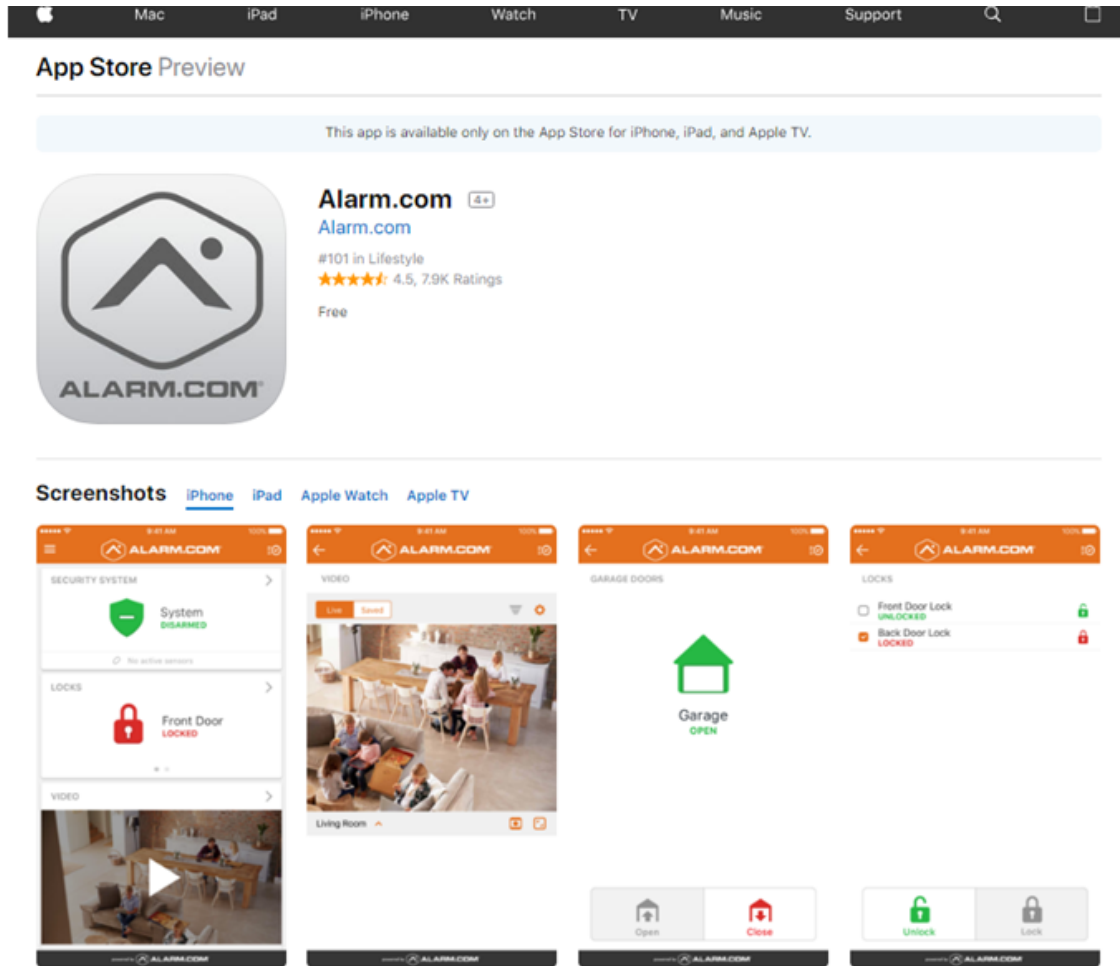
Source: <https://www.linkinteractive.com/product/CO-2GIG-CP21-345E2>

23. 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 Home Security and Home Automation System including Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote (“a display”) to present an indication (such as alarm, notification and/or alerts) of at least one of the coupled sensors based on the signal indicative of the assigned status (such as motion, smoke and/or carbon monoxide). The sensor measures a magnitude of a parameter (such as resistance, voltage and/or current) and generates a count value representative of at least one of the magnitude. Further, Defendant also provides a mobile application (“Alarm.com”) to present an

indication (such as alarm, notification and/or alerts) of at least one of the coupled sensor based on the signal indicative of the assigned status (such as motion, smoke and/or carbon monoxide) on a computing device (such as smartphone, tablet and/or PC). Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.



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



Source: <https://itunes.apple.com/us/app/alarm-com/id315010649?mt=8>

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

25. 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.

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

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

27. Plaintiff incorporates paragraphs 1 through 26 herein by reference.

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



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

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

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

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

32. The claims of the '869 recite subject matter that is similar to that recited in the claims of the '744 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 '744 Patent (discussed above in connection with Count I).

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

34. 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.

35. 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.

36. 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.

37. 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.

38. 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 a Home Security and Home Automation System including central alarm control panels (such as Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote) for monitoring the measurable parameter (“such as inductance, resistance and/or capacitance”) of an electric circuit associated with at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.). Infringing products and certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



### Build Your Own Security Package

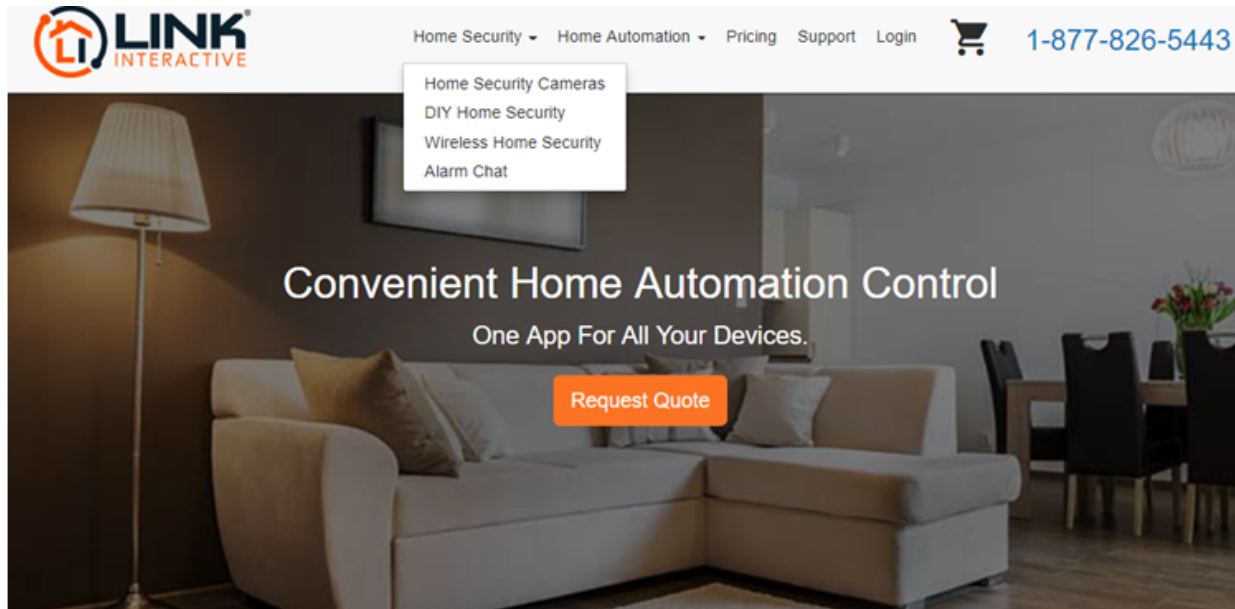
#### DIY Home Security Systems

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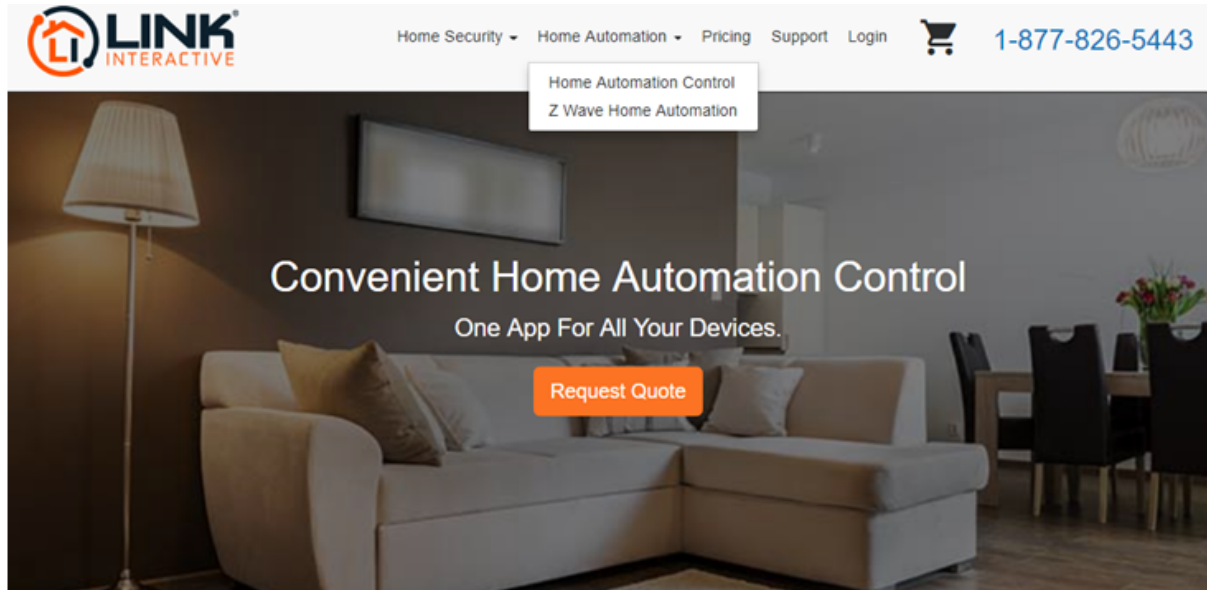
Here you will find all the necessary equipment and technology to keep your loved ones and possessions safe. Take control of your home's safety today with the help of Link Interactive.



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



Source: <https://www.linkinteractive.com/home-automation/home-automation-control/>



Source: <https://www.linkinteractive.com/home-automation/home-automation-control/>



## DIY Security Equipment

Link Interactive offers you the flexibility to customize your own diy home security system to match your specific needs and budget. You'll find affordable security products that have attained the highest level of reliability. Put yourself in control of your home's safety today with the help of Link Interactive.

We offer the highest quality in customer support before, during and after the self-installation process via live chat, phone, email, skype, and easy-to-follow installation videos. Save yourself time and money with a security company that's been in business since 1952 and carries an A+ rating from the Better Business Bureau.

### Which Type of Security Products Are You Looking For?



Home Security



Life Safety



Home Automation



Cameras



Add Ons

**Build A Custom Security System**



### Put Together A Security/Home Automation System That Fits Your Needs

This option lets you select from all of our components to build a customized option perfect for your home or small business.

[Start Customizing](#)

### Popular Security Systems for your Home



Go!Control Alarm Panel

The Future of residential home security and home management is NOW! With the Go!control alarm panel, you get an all-in-one security system with home management.



PANIC1 Wireless Remote Panic Button

The wireless water-resistant panic button is completely portable and comes with a necklace cord, wristband and belt clip. The pendant may be used anywhere, even in the shower!



2GIG Indoor HD Camera

This indoor camera includes IR LEDs for viewing in low-light conditions and incorporates PIR with video motion detection (VMD) to reduce false motion-detection events.

Source: <https://www.linkinteractive.com/home-security/diy-home-security/>



## Life Safety Products

Be alerted and ready for any fires or home disasters with the life safety equipment offered by Link Interactive. We offer a selection of smoke sensors, heat detectors, carbon monoxide sensors, and more which can all be integrated into Alarm.com's cloud service, allowing you to control and monitor every component of your family's safety from one central control center.

### Component Categories

- Home Security
- Life Safety
- Home Automation
- Cameras
- Add Ons



### Smoke/Heat/Freeze Sensor

The wireless Smoke/Heat/Freeze Sensor, 2GIG's next generation in fire and freeze protection, offers smoke detection, heat detection, and freeze detection. It is more customizable than previous models by allowing separation of the smoke, heat, and freeze features enabling the alarm to detect one, two, or all three.

[Learn More >](#)



### Heat Detector

The sensor will send a signal if it senses an increase of 15 or more degrees per minute, and will also signal if the environmental temperature reaches 135 degrees.

[Learn More >](#)

### Disaster Sensor

Three Golsys compatible wireless sensors in one! It detects flood, heat, and freeze situations.

[Learn More >](#)



### FireFighter Module

The 2Gig FireFighter is a quick and easy way to add smoke alarm monitoring to your 2Gig control panel. FireFighter is specifically tuned to recognize the specific cadence of a UL listed smoke detector's alarm. This unique audio technology monitors existing UL listed hard wired smoke detectors in a home and will send a wireless signal to the control panel when an alarm is detected. The control panel will then contact the central monitoring station. When used with the interconnected smoke detector found in most

Source: [https://www.linkinteractive.com/product\\_cat/life-safety/](https://www.linkinteractive.com/product_cat/life-safety/)

Protect your family and home with Link Interactive's wide selection of wireless DIY home security equipment. Install motion sensors, window, and door sensors to be alerted if anyone is entering your home. Access and manage all your security equipment from one central alarm control panel. Instantly get alerts for shattering glass with our wireless glass break sensor. Other home security equipment that Link Interactive offers include panic buttons, and much more. Start building up your home security with equipment from Link Interactive today.

**Component Categories**

- Home Security
- Life Safety
- Home Automation
- Cameras
- Add Ons

**Smart Home Panel**

The 2GIG GoControl panel packs high-tech wireless technology into a compact, user-friendly unit for the DIY homeowner. Full voice responses, quick access emergency buttons and multiple arming options maximize your security needs, while the convenience of an interactive panel, home automation, remote access and over-the-air software updates keep you continuously on top of technology. By maximizing the features, you can turn off the alarm system prior to the kids arriving home from school, be notified when they arrive home, keep the medicine cabinet armed even when the rest of the home is unarmed, and know by user code who is arming and disarming the system. The functionality of the GoControl panel seems to be endless once you see how easy it is to customize the panel to get the information you desire.

**Key Ring Remote**

The key ring remotes are small, portable touchpads which allow you to conveniently arm and disarm your security system or to initiate a panic alert. Consider ordering additional units to give one to each family member, trusted neighbor or your cleaning service! Each remote is uniquely identified by the security system and you may have up to eight remotes on your alarm system.

**Secondary Keypad**

The wireless remote keypad gives you the ability to arm and disarm your system, along with two 24/7 emergency buttons. For use in the master bedroom, frequently used exit doors or anywhere in the home where you want the capability of controlling your security alarm.

**Secondary Touchpad**

The wireless touch screen keypad is an excellent addition to any 2GIG system, enabling you to more conveniently access and control your home security and home automation devices from any room in your house.

Source: [https://www.linkinteractive.com/product\\_cat/home-security/](https://www.linkinteractive.com/product_cat/home-security/)

39. The infringing products provide a measurement means to measure the parameter of the circuit. For example, the Home Security and Home Automation System integrates with at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) to measure the magnitude of the parameter of the circuit associated with the sensor. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

40. 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 Home Security and Home Automation System comprises a comparison module coupled with at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) which compares the measured parameter with a threshold value and to assign a status signal (such as alert, notification and/or notification) based on a result of the comparison. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

41. 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 Home Security and Home Automation System comprises a communication module (“transmission means”) for at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) to transmit the status signal (such as alert, notification and/or notification) via a wireless network (such as GSM cellular, BLE 4.2, Wi-Fi and/or Z-Wave) to a central alarm control panels (such as Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote) (“display”). The communicated status contains digital bits indicating the status and being sufficient to describe the status. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

42. 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 Home Security and Home Automation System including Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote (“a display”) to present an indication (such as alarm, notification and/or alerts) of at least one of the coupled sensors based on the signal assigned status transmitted over the wireless network. Further, Defendant also provides a mobile application (“Alarm.com”) to display an indication (such as alarm, notification and/or alerts) of at least one of the coupled sensor based on the signal assigned status on a computing device (such as smartphone, tablet and/or PC). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

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

44. 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.

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

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

46. Plaintiff incorporates paragraphs 1 through 45 herein by reference.

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

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

49. A copy of the ‘893 Patent, titled “Circuit Monitoring Device,” is attached hereto as Exhibit C.

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

51. The claims of the '893 recite subject matter that is similar to that recited in the claims of the '744 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 '744 Patent (discussed above in connection with Count I).

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

53. 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.

54. 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.

55. 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.

56. 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.

57. Regarding Claim 1, Defendant makes, uses, sells and/or offers for sale a circuit monitoring device. Defendant provides a Home Security and Home Automation System (such as Home Security Cameras, DIY Home Security, Wireless Home Security, Alarm Chat, Home Automation Control and/or Z Wave Home Automation) for monitoring at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.). Infringing products and certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.



#### Build Your Own Security Package

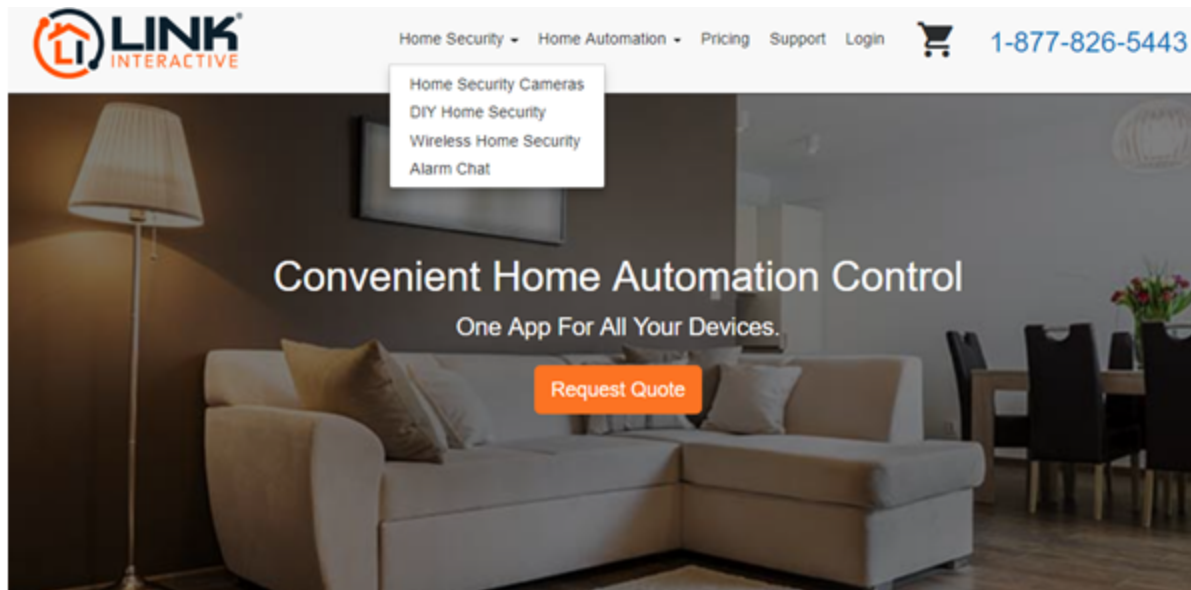
##### DIY Home Security Systems

According to the latest statistics from the FBI, a burglary occurs somewhere in the United States every 14.8 seconds. Today's criminal have become more and more adept at entering homes and quickly finding your most valuable and precious belongings. Protect yourself against crime by installing a security system from Link Interactive, featuring 24/7 central station monitoring and cellular-based automation.

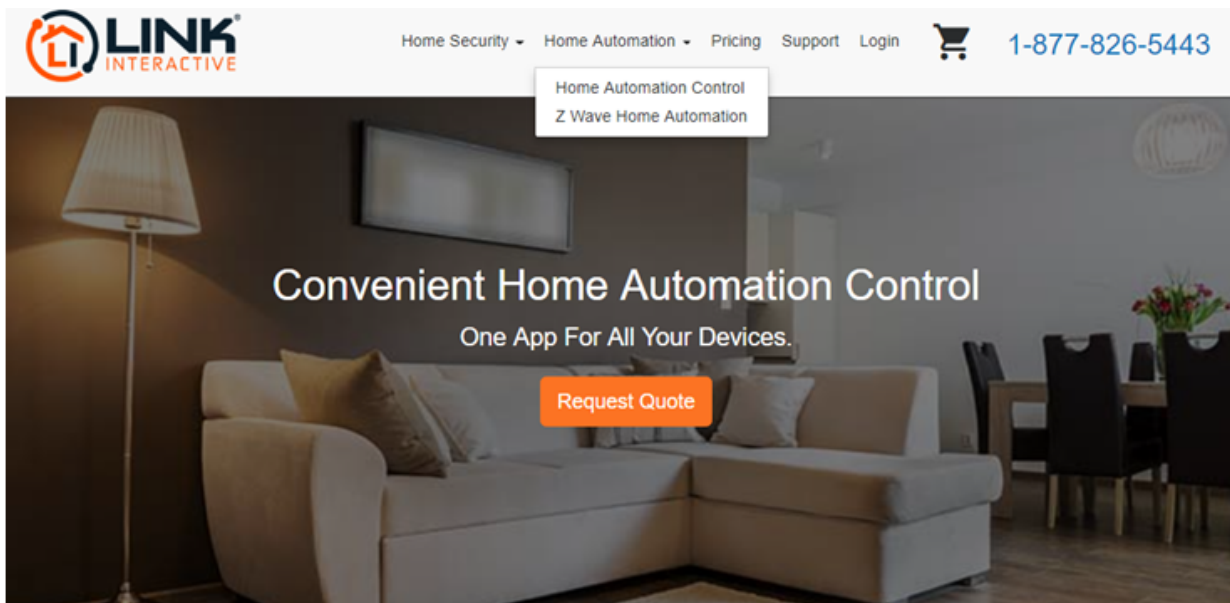
Here you will find all the necessary equipment and technology to keep your loved ones and possessions safe. Take control of your home's safety today with the help of Link Interactive.



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



Source: <https://www.linkinteractive.com/home-automation/home-automation-control/>



Source: <https://www.linkinteractive.com/home-automation/home-automation-control/>



## DIY Security Equipment

Link Interactive offers you the flexibility to customize your own diy home security system to match your specific needs and budget. You'll find affordable security products that have attained the highest level of reliability. Put yourself in control of your home's safety today with the help of Link Interactive.

We offer the highest quality in customer support before, during and after the self-installation process via live chat, phone, email, skype, and easy-to-follow installation videos. Save yourself time and money with a security company that's been in business since 1952 and carries an A+ rating from the Better Business Bureau.

### Which Type of Security Products Are You Looking For?



Home Security



Life Safety



Home Automation



Cameras



Add Ons

#### Build A Custom Security System



#### Put Together A Security/Home Automation System That Fits Your Needs

This option lets you select from all of our components to build a customized option perfect for your home or small business.

[Start Customizing](#)

### Popular Security Systems for your Home



Go!Control Alarm Panel

The Future of residential home security and home management is NOW! With the Go!control alarm panel, you get an all-in-one security system with home management.



PANIC1 Wireless Remote Panic Button

The wireless water-resistant panic button is completely portable and comes with a necklace cord, wristband and belt clip. The pendant may be used anywhere, even in the shower!



2GIG Indoor HD Camera

This indoor camera includes IR LEDs for viewing in low-light conditions and incorporates PIR with video motion detection (VMD) to reduce false motion-detection events.

Source: <https://www.linkinteractive.com/home-security/diy-home-security/>



## Life Safety Products

Be alerted and ready for any fires or home disasters with the life safety equipment offered by Link Interactive. We offer a selection of smoke sensors, heat detectors, carbon monoxide sensors, and more which can all be integrated into Alarm.com's cloud service, allowing you to control and monitor every component of your family's safety from one central control center.

- Component Categories
- Home Security
  - Life Safety
  - Home Automation
  - Cameras
  - Add Ons



### Smoke/Heat/Freeze Sensor

The wireless Smoke/Heat/Freeze Sensor, 2GIG's next generation in fire and freeze protection, offers smoke detection, heat detection, and freeze detection. It is more customizable than previous models by allowing separation of the smoke, heat, and freeze features enabling the alarm to detect one, two, or all three.

[Learn More >](#)



### Heat Detector

The sensor will send a signal if it senses an increase of 15 or more degrees per minute, and will also signal if the environmental temperature reaches 135 degrees.

[Learn More >](#)

### Disaster Sensor

Three Golsys compatible wireless sensors in one! It detects flood, heat, and freeze situations.

[Learn More >](#)



### FireFighter Module

The 2Gig FireFighter is a quick and easy way to add smoke alarm monitoring to your 2Gig control panel. FireFighter is specifically tuned to recognize the specific cadence of a UL listed smoke detector's alarm. This unique audio technology monitors existing UL listed hard wired smoke detectors in a home and will send a wireless signal to the control panel when an alarm is detected. The control panel will then contact the central monitoring station. When used with the interconnected smoke detector found in most

Source: [https://www.linkinteractive.com/product\\_cat/life-safety/](https://www.linkinteractive.com/product_cat/life-safety/)

## Home Security Products

Protect your family and home with Link Interactive's wide selection of wireless DIY home security equipment. Install motion sensors, window, and door sensors to be alerted if anyone is entering your home. Access and manage all your security equipment from one central alarm control panel. Instantly get alerts for shattering glass with our wireless glass break sensor. Other home security equipment that Link Interactive offers include panic buttons, and much more. Start building up your home security with equipment from Link Interactive today.


- Component Categories
- Home Security
  - Life Safety
  - Home Automation
  - Cameras
  - Add Ons



### Smart Home Panel

The 2GIG GoControl panel packs high-tech wireless technology into a compact, user-friendly unit for the DIY homeowner. Full voice response, quick access emergency buttons and multiple arming options maximize your security needs, while the convenience of an interactive panel, home automation, remote access and over the air software updates keep you continuously on top of technology. By maximizing the features, you can turn off the alarm system prior to the kids arriving home from school, be notified when they arrive home, keep the medicine cabinet armed even when the rest of the home is unarmed, and know by user code who is arming and disarming the system. The functionality of the GoControl panel seems to be endless once you see how easy it is to customize the panel to get the information you desire.

[Learn More >](#)



### Key Ring Remote

The key ring remotes are small, portable touchpads which allow you to conveniently arm and disarm your security system or to initiate a panic alert. Consider ordering additional units to give one to each family member, trusted neighbor or your cleaning service! Each remote is uniquely identified by the security system and you may have up to eight remotes on your alarm system.

[Learn More >](#)



### Secondary Keypad

The wireless remote keypad gives you the ability to arm and disarm your system, along with two 24/7 emergency buttons. For use in the master bedroom, frequently used exit doors or anywhere in the home where you want the capability of controlling your security alarm.

[Learn More >](#)



### Secondary Touchpad

The wireless touch screen keypad is an excellent addition to any 2GIG system, enabling you to more conveniently access and control your home security and home automation devices from any room in your house.

[Learn More >](#)

Source: [https://www.linkinteractive.com/product\\_cat/home-security/](https://www.linkinteractive.com/product_cat/home-security/)

### Dedicated Communication

Dedicated and secure cellular communication provides safe and reliable uninterrupted protection – even if the phone, internet or broadband is down.

Reliable & fast cellular communication, no landline needed.

In the event of a power outage, your system will operate on backup battery power for 24 hours so you stay secure.

Safe for critical security messages – not shared with internet, entertainment or phone lines.



### Tamper-Resistant

Alarm.com withstands common vulnerabilities to keep you protected when you need it most.

Patented Crash & Smash technology ensures that your system works even if the security panel is damaged before it can send a signal, or the phone line is cut.

Secure cellular communication is not impacted by damaged phone, internet or broadband lines that can be cut from the outside.

Source: <https://www.linkinteractive.com/home-automation/z-wave-home-automation/>



## Awareness & Control Wherever You Go

Unlike traditional systems that only alert you in an alarm event, Alarm.com lets you know what's happening at your property at any time – whether your system is armed or not. And with our mobile app, you can check in anytime and arm and disarm your system remotely wherever you go.



### Mobile App

Stay in control of your system at all times. Our top rated, easy to use mobile app puts your home in your hands. You can arm and disarm your system, and check the arming status at any time.

### Instant Alerts

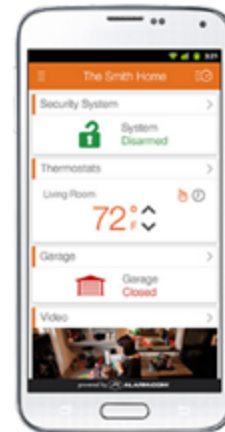
Get real-time notifications by text or email to know what's happening at home, the moment it happens. Choose to receive alerts via text, push notification, email or phone call.

### Personalized User Codes

Create unique user codes for your family and visitors, and know who's coming and going, and who armed or disarmed the system. Enable or disable codes at any time.

### History

Look back at activity over time or search for specific events. With our always-aware sensors and searchable event history, you can review any activity by sensor, type of event, date or time.



Source: <https://www.linkinteractive.com/home-automation/z-wave-home-automation/>

58. 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 Home Security and Home Automation System including Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote comprises one or more processors having a memory which is further electrically coupled over a wireless network with the sensor to receive a measured electrical parameter (such as resistance, inductance and/or capacitance) of the circuit associated with the sensor. The Home Security and Home Automation System also comprises a software to configure the one or more

processors and send the signals (such as alert, notification and/or notification) to a Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote and/or mobile computing device via a wireless network (such as GSM cellular, BLE 4.2, Wi-Fi and/or Z-Wave). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

59. 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 Home Security and Home Automation System integrates with at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) which compares a digital value corresponding to a magnitude of the measured parameter (such as inductance, resistance and/or capacitance) with a threshold value stored in the memory. The plurality of threshold values (high or low) corresponds to the plurality of the circuit conditions (such as normal condition and alarm condition (alert, notification, siren and/or panic button)). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

60. 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 Home Security and Home Automation System assigns a status (such as alert, notification and/or notification) based on the digital value. The digital

value is in the range defined by one or more threshold values. Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

61. The infringing products provide a communication module configured to generate a status signal including at least the assigned status. For example, the Home Security and Home Automation System provides a network communication module coupled with at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) which compares the count value with a threshold value and generates a status signal (such as alert, notification and/or notification). Certain aspects of this element are illustrated in the screenshots provided in connection with other allegations herein.

62. The infringing products provide a transmitter configured to transmit the status signal to a remote computing system over a network for output, by the remote computing system, of the status. For example, the Home Security and Home Automation System provides a communication module (“transmission means”) for at least one of the sensors (such as Wireless Door and Window Sensors, Tilt Sensor, Smoke/Heat/Freeze Sensor, FireFighter Module, Disaster Sensor, Carbon Monoxide Detector, Water Leak Detector Sensor, Motion Sensor, Indoor Camera etc.) to transmit the status signal ((such as alert, notification and/or notification) to a central alarm control panels (such as Go!Control Alarm Panel, Smart Home Panel, Secondary Touchpad and/or IQ Panel 2 Remote) (“display”). 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.

**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: July 17, 2019

Respectfully submitted,

*/s/Stamatios Stamoulis*

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weinblatt@swdelaw.com

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on July 17, 2019.

*/s/Stamatios Stamoulis*

\_\_\_\_\_  
**STAMATIOS STAMOULIS (#4606)**