

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SENSORMATIC ELECTRONICS, LLC,)	
)	
Plaintiff,)	
)	C.A. No. _____
v.)	
)	JURY TRIAL DEMANDED
WYZE LABS, INC.,)	
)	
Defendant.)	

COMPLAINT

Plaintiff Sensormatic Electronics, LLC (“Sensormatic”), by and for its Complaint for patent infringement against Defendant Wyze Labs, Inc. (“Wyze”), alleges to the Court as follows:

PARTIES

1. Sensormatic is a company organized and existing under the laws of the State of Nevada, with a principal place of business located at 6 Technology Park Drive, Westford, Massachusetts 01886.

2. Sensormatic is informed and believes that Wyze is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 22522 29th Drive SE, Suite L101, Bothell, Washington 98021.

JURISDICTION AND VENUE

3. This is an action for patent infringement arising out of Wyze’s unauthorized manufacturing, distributing, offering for sale, and selling of video surveillance products in violation of Sensormatic’s patent rights. Because this action for infringement arises under the patent laws of the United States, 35 U.S.C. § 271, *et seq.*, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Wyze in that at all times pertinent hereto, upon information and belief, Wyze has had systematic activities in this Judicial District and has committed and/or is committing infringing acts in Delaware and this District. More specifically, upon information and belief, Wyze manufactures, offers for sale, and sells video surveillance products, including the infringing products, in this Judicial District for use in this Judicial District as well as across the United States. Additionally, upon information and belief, Wyze is a corporation incorporated in Delaware and does business within this Judicial District.

5. Venue is proper in the District of Delaware pursuant to 28 U.S.C. §§ 1391(b) and (c) and 1400(b) because Wyze at least resides in, is subject to personal jurisdiction in, and has committed acts of infringement in this District.

BACKGROUND

THE PATENTS-IN-SUIT

6. Sensormatic is the assignee and owner of United States Patent No. 7,954,129 (“the ’129 patent”). The ’129 patent, which is entitled “Wireless video surveillance system and method with remote viewing,” was duly and legally issued by the United States Patent and Trademark Office on May 31, 2011. A true and correct copy of the ’129 patent is attached hereto as Exhibit A.

7. Sensormatic is the assignee and owner of United States Patent No. 7,730,534 (“the ’534 patent”). The ’534 patent, which is entitled “Enterprise video intelligence and analytics management system and method,” was duly and legally issued by the United States Patent and Trademark Office on June 1, 2010. A true and correct copy of the ’534 patent is attached hereto as Exhibit B.

8. Sensormatic is the assignee and owner of United States Patent No. 7,936,370 (“the ’370 patent”). The ’370 patent, which is entitled “Wireless video surveillance system and

method with dual encoding,” was duly and legally issued by the United States Patent and Trademark Office on May 3, 2011. A true and correct copy of the ’370 patent is attached hereto as Exhibit C.

9. Sensormatic is the assignee and owner of United States Patent No. 8,208,019 (“the ’019 patent”). The ’019 patent, which is entitled “Wireless video surveillance system and method with external removable recording,” was duly and legally issued by the United States Patent and Trademark Office on June 26, 2012. A true and correct copy of the ’019 patent is attached hereto as Exhibit D.

10. Sensormatic is the assignee and owner of United States Patent No. 8,610,772 (“the ’772 patent”). The ’772 patent, which is entitled “Wireless video surveillance system and method with input capture and data transmission prioritization and adjustment,” was duly and legally issued by the United States Patent and Trademark Office on December 17, 2013. A true and correct copy of the ’772 patent is attached hereto as Exhibit E.

11. Sensormatic is the assignee and owner of United States Patent No. 9,407,877 (“the ’877 patent”). The ’877 patent, which is entitled “Wireless video surveillance system and method with input capture and data transmission prioritization and adjustment,” was duly and legally issued by the United States Patent and Trademark Office on August 2, 2016. A true and correct copy of the ’877 patent is attached hereto as Exhibit F.

12. Sensormatic is the assignee and owner of United States Patent No. 10,198,923 (“the ’923 patent”). The ’923 patent, which is entitled “Wireless video surveillance system and method with input capture and data transmission prioritization and adjustment,” was duly and legally issued by the United States Patent and Trademark Office on February 5, 2019. A true and correct copy of the ’923 patent is attached hereto as Exhibit G.

13. The '370, '534, '129, '019, '772, '877, and '923 patents are collectively referred to herein as the "Patents-in-Suit."

**SENSORMATIC ACQUIRES SMARTVUE CORPORATION
WHICH HAD A HISTORY OF INNOVATION**

14. Mr. Martin Renkis, named inventor of the Patents-in-Suit, was the founder of Smartvue Corporation ("Smartvue"), the original assignee of the Patents-in-Suit.

15. Smartvue grew from a start-up company housed in Mr. Renkis' log cabin in North Carolina into a multi-million dollar company acquired by Sensormatic, an indirect subsidiary wholly owned by Johnson Controls International plc that manufactures and sells commercial surveillance equipment solutions. In 2018, as part of the Sensormatic acquisition, Smartvue's extensive patent portfolio was transferred to Sensormatic.

16. Smartvue, which began in 1996 as Security Data Networks, Inc., has provided commercial and residential video surveillance solutions including custom hardware and software innovations utilizing a previously unknown communication and remote storage capability, commonly referred to today as "storage in the Cloud."

17. Always innovating, for more than twenty years, Mr. Renkis and Smartvue have made significant investments in the engineering, design, and development of Cloud-based security products. With more than thousands of customers, Smartvue has emerged as an industry and market leader in providing Cloud-based software solutions, which is now part of Sensormatic.

COUNT I

INFRINGEMENT OF UNITED STATES PATENT NO. 7,954,129

18. Sensormatic repeats and realleges each and every allegation contained in paragraphs 1-17, inclusive, as though fully set forth herein.

19. The '129 patent is valid and enforceable.

20. Since at least August 19, 2019, Wyze has had notice of the '129 patent and Sensormatic's infringement allegations relating to the same.

21. Without permission or authorization from Sensormatic, Wyze has manufactured, offered for sale, and sold and continues to manufacture, offer for sale, and sell certain video surveillance systems, including, without limitation, Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App, which infringe at least claim 14 of the '129 patent in violation of 35 U.S.C. § 271(a).

22. Without permission or authorization from Sensormatic and in violation of 35 U.S.C. § 271(b), Wyze induced and continues to induce the direct infringement of at least claim 14 of the '129 patent by aiding, abetting, and encouraging its customers' use of the Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App with knowledge of the infringement of the '129 patent and with the intent to cause such infringement.

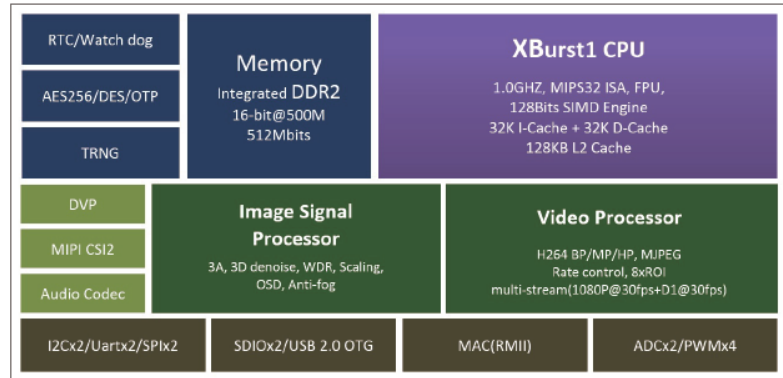
23. For example, the following chart depicts and describes how a Wyze Cam, Wyze Cam Pan, and/or Wyze Sense, used in conjunction with the Wyze App, meet each and every claim limitation of claim 14 of the '129 patent:

U.S. Pat. No. 7,954,129	
14. A surveillance system for wireless communication between components comprising:	The Wyze Cam V1/V2, Wyze Cam Pan, Wyze Sense, and Wyze App executing on a mobile device are connected over Wi-Fi and cellular networks to provide a surveillance system for wireless communication. <i>See, e.g., Say Hello to WyzeCam, https://youtu.be/kRytpc3q4Lw; Introducing Wyze Sense – Contact and Motion Sensors for Your Home, https://www.youtube.com/watch?v=rlp5f5jJPSk.</i>
a base system including at least two wireless input capture devices (ICDs), the ICDs having	The Wyze Cam V2 and/or Wyze Cam Pan are available for purchase at http://www.wyze.com . (The Wyze Cam V1 was previously available for purchase on the Wyze website.) The Wyze app can be downloaded and executed on a mobile device executing IOS or

U.S. Pat. No. 7,954,129	
<p>at least one sensor and at least one input component for detecting and recording inputs, a processor, a memory, a transmitter/receiver, all constructed and configured in electronic connection;</p>	<p>Android.</p> <p>The Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images from a target environment.</p> <p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won’t miss a thing.” • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.” <p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.” • “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.” <p>Upon information and belief, each of the Wyze Cam V1/V2 and Wyze Cam Pan has an embedded DSP chip that runs software. For example, upon information and belief, some of the Wyze cameras include the Ingenic T20 Smart Video Processor.</p>

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T20 Block Diagram



See *T20 FHD Smart Video Processor Datasheet T20_P8.pdf*
(ftp://ftp.ingenic.com/SOC/T20/T20_PB.PDF).

Each camera has a transmitter/receiver. For example, each Wyze Cam V1/V2 and/or Wyze Cam Pan transmits and receives via Wi-Fi using an included Wi-Fi Chip.

Regarding the Wyze Cam and Wyze Cam Pan (from <https://www.wyze.com/wyze-cam> and <https://www.wyze.com/wyze-cam-pan>):

- “802.11 b/g/n 2.4GHz (Does not support 5GHz network)
Supports WPA and WPA2 protocols”

The Wyze Cam V1/V2 and the Wyze Cam Pan can record inputs from a user sent from a mobile device executing the Wyze app.

From “Wyze Cam Alert Settings” video
(<https://www.youtube.com/watch?v=qCIXbkygGkg>)

- At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.”

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	<ul style="list-style-type: none"> • At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of your motion detection between low, medium, and high.” • At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.” • At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.” <p>The Wyze Cam V1/V2 and the Wyze Cam Pan can also record video and/or audio in response to detecting an event or a user pressing a record button on a mobile device executing the Wyze app.</p> <p>From “Wyze Cam Alert Settings” video https://www.youtube.com/watch?v=qCIXbkygGkg)</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.” <p>From “Making the Most of the Wyze Cam Live Stream” video https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 1:55 – “Next to that is the record video button where you can record a video clip from the livestream to your phone. The clip will record as long as you like, but it will end if you

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exit the livestream.”

The Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.

From the Wyze Sense Setup Guide

(<https://support.wyzecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide>):

- “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it’s within 2 cm of this switch.

The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high.”

The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.

From <https://www.wyze.com/wyze-sense>:

- “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.”

From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video

(<https://www.youtube.com/watch?v=rlp5f5jJPSk>):

- At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup

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	<p>a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes.”</p> <p>The Wyze app can be used to set a notification when the motion sensor detects movement or the contact sensor registers as open.</p> <p>From https://support.wyzecam.com/hc/en-us/articles/360030468852-Events-and-Notifications:</p> <ul style="list-style-type: none"> • “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this: <ol style="list-style-type: none"> 1. Open the Wyze app 2. Tap the sensor's listing on your Home tab to access the Device Screen 3. Tap the SettingsGear icon in the top right 4. Tap Notifications 5. Select when you want to receive Push Notifications from your sensor <ul style="list-style-type: none"> ○ For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open ○ For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear 6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”
<p>wherein the ICDs are operable for direct wireless cross-communication with each other without requiring interaction with a remote server computer for operation; and</p>	<p>The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.” <p>From “Introducing Wyze Sense – Contact and Motion Sensors for</p>

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	<p>Your Home” video https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes. So one of the great things about using Wyze Cam as our connection to Wi-Fi is that we can also record a sensor readout. With the sensor readout, we can easily pair the sensor to the camera where we can let the camera record a video when something’s triggered. So if you have a Wyze Cam pointed at the front door with a contact sensor, you don’t have to get a notification when the dog walks by or a family member walks by. You’ll get a notification when the door is opened. And only when the door is opened you can see who exactly walked in.”
<p>wherein the ICDs are operable for direct wireless communication with a remote viewing device operable by an authorized user.</p>	<p>The Wyze Cam and Wyze Cam Pan communicate via 2.4 GHz Wi-Fi with a mobile device executing the Wyze app.</p> <p>Regarding the Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols” <p>From “Making the Most of the Wyze Cam Live Stream” video (https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> At 0:07 – “The devices tab shows all your connected devices with a thumbnail of the last streaming session. Just press on the thumbnail of the camera you want to see, and you’ll jump into a new livestream. You should see a live feed video from your Wyze Cam.” <p>In order to use the Wyze app, you have to create a user account and pair the account to the Wyze Cam, Wyze Cam Pan, and/or Wyze Sense. As such, a user communicating with the Wyze Cam, Wyze Cam Pan, and/or Wyze Sense via the Wyze app is an authorized user.</p>

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	<p>From “Wyze Cam Setup” video https://www.youtube.com/watch?v=BB5oXEQZw4U):</p> <ul style="list-style-type: none"> At 0:31 – “Going back to your smartphone or tablet, open up the Wyze app and log in. Create a Wyze account, if you don’t already have one. Enter your email and password. It’ll then send a verification code via your email. Pop that email code into the Wyze app, and now you’re logged in and given a plus sign. This’ll let you add new devices and connect your camera to your account. When you’re ready for setup, turn the camera over, and press the button until you hear ‘Ready to connect.’ Once you’ve heard that, press ‘Next’ on the app. You will then need to put in your Wi-Fi info. Once you’re connected to your network, you tap this button [indicating ‘Next’] to get the QR code. Hold your phone steady, about five inches away [from the camera]. It should scan the QR code in a few seconds.... Once it is successfully scanned, you will hear ‘QR code scanned. Please wait.’ Press this button [stating ‘I heard QR code scanned. Please wait’], and Wyze Cam will finish the setup on its own. The LED light indicator on the back [of the camera] will start flashing yellow and blue, then flashing blue, and when setup is complete, it turns to a solid blue and says, ‘Setup complete.’ Name your camera, and you’re good to go.”

24. Sensormatic reserves the right to modify its infringement theories as discovery progresses in this case; it shall not be estopped for infringement contention or claim construction purposes by the information contained herein. This chart is intended to satisfy the notice requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure; it does not represent Sensormatic’s preliminary or final infringement contentions or preliminary or final claim construction positions.

25. Wyze’s infringement of the ’129 patent has been and continues to be willful and deliberate.

26. Wyze's conduct has caused and will continue to cause Sensormatic substantial damage, including irreparable harm, for which Sensormatic has no adequate remedy at law, unless and until Wyze is enjoined from infringing the '129 patent.

COUNT II

INFRINGEMENT OF UNITED STATES PATENT NO. 7,730,534

27. Sensormatic repeats and realleges each and every allegation contained in paragraphs 1-17, inclusive, as though fully set forth herein.

28. The '534 patent is valid and enforceable.

29. Since at least August 19, 2019, Wyze has had notice of the '534 patent and Sensormatic's infringement allegations relating to the same.

30. Without permission or authorization from Sensormatic, Wyze has manufactured, offered for sale, and sold and continues to manufacture, offer for sale, and sell certain video surveillance systems, including, without limitation, Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App, which infringe at least claim 1 of the '534 patent in violation of 35 U.S.C. § 271(a).

31. Without permission or authorization from Sensormatic and in violation of 35 U.S.C. § 271(b), Wyze induced and continues to induce the direct infringement of at least claim 1 of the '534 patent by aiding, abetting, and encouraging its customers' use of the Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App with knowledge of the infringement of the '534 patent and with the intent to cause such infringement.

32. For example, the following chart depicts and describes how a Wyze Cam, Wyze Cam Pan, and/or Wyze Sense, used in conjunction with the Wyze App, meet each and every claim limitation of claim 1 of the '534 patent:

U.S. Pat. No. 7,730,534	
<p>1. A wireless surveillance system including:</p>	<p>The Wyze Cam V1/V2, Wyze Cam Pan, Wyze Sense, and Wyze App executing on a mobile device are connected over Wi-Fi and cellular networks to provide a surveillance system for wireless communication.</p> <p><i>See, e.g., Say Hello to WyzeCam, https://youtu.be/kRytpc3q4Lw; Introducing Wyze Sense – Contact and Motion Sensors for Your Home, https://www.youtube.com/watch?v=rlp5f5jJPSk.</i></p>
<p>at least one input capture device (ICD) having input sensors operable for capturing data input from activities within a target environment,</p>	<p>The Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images from a target environment.</p> <p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won’t miss a thing.” • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.” <p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.” • “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.” <p>Additionally, the Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.</p> <p>Regarding the Wyze Sense (from https://www.wyze.com/wyze-sense):</p> <ul style="list-style-type: none"> • “Wyze Contact Sensors notify you any time something is opened, closed, or left open.” • “Wyze Motion Sensors notify you when motion from people

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	or pets is detected.”
<p>the at least one ICD operable for direct cross-communication, including data exchange, with one or more other ICDs through a wireless communication network;</p>	<p>The Wyze Cam and Wyze Cam Pan communicate via 2.4 GHz Wi-Fi with a mobile device executing the Wyze app and Amazon Web Services (AWS) for storage of event videos.</p> <p>Regarding the Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols” <p>The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.” <p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video (https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> • At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes. So one of the great things about using Wyze Cam as our connection to Wi-Fi is that we can also record a sensor readout. With the sensor readout, we can easily pair the sensor to the camera where we can let the camera record a video when something’s triggered. So if you have a Wyze Cam pointed at the front door with a contact sensor, you don’t have to get a notification when the dog walks by or a family member walks by. You’ll get a

U.S. Pat. No. 7,730,534	
	notification when the door is opened. And only when the door is opened you can see who exactly walked in.”
a remote server computer (RSC) with software operable thereon for providing automated functions selected from analytics, data storage, reporting, device management, control, and combinations thereof;	<p>A mobile device executing the Wyze App can store videos, show event reports, and manage and control the camera. Upon information and belief, the Wyze App provides this functionality by communicating with a “remote server computer” maintained by Wyze that allows remote access via the Wyze App to the installed Wyze system.</p> <p>From “Making the Most of the Wyze Cam Live Stream” video (https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 0:07 – “The devices tab shows all your connected devices with a thumbnail of the last streaming session. Just press on the thumbnail of the camera you want to see, and you’ll jump into a new livestream. You should see a live feed video from your Wyze Cam.” • At 0:35 – “Above the video feed in the top left corner there’s an HD/SD toggle. HD/SD affects your video quality by causing your Wyze Cam to switch between high definition (HD) and standard definition (SD).” • At 0:57 – “On the right side you’ll find night vision. Night vision turns your video gray and makes use of the camera’s infrared lights so you can see in the dark. By tapping the button, you can toggle the night vision on, off, or put it on auto, and as you’d expect, auto switches night vision on automatically as it gets dark.” <p>From “Wyze Cam Alert Settings” video (https://www.youtube.com/watch?v=qCIXbkygGkg):</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.” • At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of

U.S. Pat. No. 7,730,534	
	<p>your motion detection between low, medium, and high.”</p> <ul style="list-style-type: none">• At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.”• At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.”• At 2:19 – “The last thing here is the alert schedule. With the alert schedule you can set up a start time and end time to receive alerts. So if you don’t need alerts if you’re already home in the evening or something, you can schedule them to automatically turn off when you get home from work. Select your desired start time and end time through the scrolling number wheels, and you will only receive alerts within that time frame.”

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<p>a digital video management and/or recording device (DVM) communicates wirelessly through the wireless communication network providing wireless communication with the at least one ICD and networked communication with the RSC;</p>	<p>AWS provides 14 days of free storage for Event Videos captured by the camera. They are uploaded via, at least, the 2.4 GHz Wi-Fi connection. The event videos are securely uploaded to the AWS (Amazon Web Service) cloud via end-to-end encryption and are accessible for 14 days.</p> <p>Regarding Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “Free rolling 14 days of Event Videos stored in the AWS Cloud” <p>From the Wyze Cam User’s Guide (https://support.wysecam.com/hc/en-us/articles/360022543292-Wyze-Cam-User-s-Guide):</p> <ul style="list-style-type: none"> • “When any of the Event detection types are turned on, your Wyze Cam will automatically record a 12-second Event video that is saved to the Cloud. These Event videos can be viewed for up to 14 days in the Events tab of the Wyze App. After 14 days, Event videos are deleted and cannot be recovered. <p>Tap the Events tab of the Wyze App to see a list of Event videos. If you have multiple cameras linked to your account, you can filter to view only the videos from one specific camera by tapping the menu icon in the upper right corner, tapping Filter and selecting that specific camera.”</p> <p>From “How to Access Wyze Cam Alert Videos” video (https://youtu.be/GlmFA8l-d3k):</p> <ul style="list-style-type: none"> • At 0:00 – “With your Wyze Cam purchase you also received free, rolling 14-day access to alert videos saved in the cloud.” • At 0:17 – “When your motion and sound alerts are turned on, as we’ve discussed in the previous video, your Wyze Cam will automatically record a 12-15 second clip each time motion or sound is detected and then save that clip to the cloud.” • At 0:45 – “Back in the Wyze app, in the main device screen, you can tap the notifications tab to access these alert videos. You’ll notice a drop-down list on the word ‘Alerts’ up at the top where you can filter alert videos by camera or just select all cameras.”

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<p>automatically activating the system based on inputs provided through a user interface on a remote computer;</p>	<p>The system is automatically activated during set-up using the Wyze app.</p> <p>From “Wyze Cam Setup” video (https://www.youtube.com/watch?v=BB5oXEQZw4U):</p> <ul style="list-style-type: none"> At 0:48 – “And now you’re logged in and given a plus sign. This’ll let you add new devices and connect your camera to your account. When you’re ready for setup, turn the camera over, and press the button until you hear ‘Ready to connect.’ Once you’ve heard that, press ‘Next’ on the app. You will then need to put in your Wi-Fi info. Once you’re connected to your network, you tap this button [indicating ‘Next’] to get the QR code. Hold your phone steady, about five inches away [from the camera]. It should scan the QR code in a few seconds.... Once it is successfully scanned, you will hear ‘QR code scanned. Please wait.’ Press this button [stating ‘I heard QR code scanned. Please wait’], and Wyze Cam will finish the setup on its own. The LED light indicator on the back [of the camera] will start flashing yellow and blue, then flashing blue, and when setup is complete, it turns to a solid blue and says, ‘Setup complete.’ Name your camera, and you’re good to go.” <p>Further, automatic event recording can be triggered by using configuration settings in the Wyze app.</p> <p>From “Wyze Cam Alert Settings” video (https://www.youtube.com/watch?v=qCIXbkygGkg):</p> <ul style="list-style-type: none"> At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.”
<p>capturing data inputs via the input capture device(s);</p>	<p>Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images.</p>

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	<p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won’t miss a thing.” • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.” <p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.” • “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.” <p>Additionally, the Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.</p> <p>Regarding the Wyze Sense (from https://www.wyze.com/wyze-sense):</p> <ul style="list-style-type: none"> • “Wyze Contact Sensors notify you any time something is opened, closed, or left open.” • “Wyze Motion Sensors notify you when motion from people or pets is detected.”
software analyzing the captured data inputs and generating a report that is viewable by the user on a display associated with the remote computer.	<p>The camera includes software to record the triggered events and upload them automatically to the cloud (AWS) for 14 days of storage. The user can use the Wyze App to see the events that were uploaded on the display of the mobile device.</p> <p>From the Wyze Cam User’s Guide (https://support.wysecam.com/hc/en-us/articles/360022543292-Wyze-Cam-User-s-Guide):</p> <ul style="list-style-type: none"> • “When any of the Event detection types are turned on, your Wyze Cam will automatically record a 12-second Event video

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that is saved to the Cloud. These Event videos can be viewed for up to 14 days in the Events tab of the Wyze App. After 14 days, Event videos are deleted and cannot be recovered.”

From “Wyze Cam Alert Settings” video

(<https://www.youtube.com/watch?v=qCIXbkygGkg>):

- At 0:58 – “Just a heads up, right now Wyze Cam uses a pixel comparison algorithm, not actual motion detection. So if the pixels within the frame are changed for any reason, you’ll get that motion notification.”

From “A Huge Update for Wyze Cam” video

(<https://www.youtube.com/watch?v=8LJcyitKL94>):

- At 1:15 – “Currently Wyze Cam uses a pixel comparison algorithm, which means that you’re taking two different frames and looking pixel by pixel to see if there is any change. Because of that, we might be sending a notification for a headlight or a shadow or for a bug.”
- At 6:53 – “Person detection is the first add-on service for Wyze Cam. Once activated, you can set your Wyze Cam to only send you notifications when it detects a person. In addition to better notifications, you are able to filter your event videos by person so that you can quickly see the videos that are more meaningful to you.”

From “How to Access Wyze Cam Alert Videos” video

(<https://youtu.be/GlmFA8l-d3k>):

- At 0:45 – “Back in the Wyze app, in the main device screen, you can tap the notifications tab to access these alert videos. You’ll notice a drop-down list on the word ‘Alerts’ up at the top where you can filter alert videos by camera or just select all cameras. This gray date bar shows which day you’re viewing videos from, so tap on the arrow next to the date to drop down this sliding calendar where you can select any day to see alert videos within the last 14 days.”
- At 1:26 – “Next to each alert video, you can see if it was triggered by motion or by sound, as well as the time that the video was recorded. To the right there’s this generic thumbnail with a play button on it. Just tap that play button to view the alert video.”

33. Sensormatic reserves the right to modify its infringement theories as discovery progresses in this case; it shall not be estopped for infringement contention or claim construction purposes by the information contained herein. This chart is intended to satisfy the notice requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure; it does not represent Sensormatic's preliminary or final infringement contentions or preliminary or final claim construction positions.

34. Wyze's infringement of the '534 patent has been and continues to be willful and deliberate.

35. Wyze's conduct has caused and will continue to cause Sensormatic substantial damage, including irreparable harm, for which Sensormatic has no adequate remedy at law, unless and until Wyze is enjoined from infringing the '534 patent.

COUNT III

INFRINGEMENT OF UNITED STATES PATENT NO. 7,936,370

36. Sensormatic repeats and realleges each and every allegation contained in paragraphs 1-17, inclusive, as though fully set forth herein.

37. The '370 patent is valid and enforceable.

38. Since at least August 19, 2019, Wyze has had notice of the '370 patent and Sensormatic's infringement allegations relating to the same.

39. Without permission or authorization from Sensormatic, Wyze has manufactured, offered for sale, and sold and continues to manufacture, offer for sale, and sell certain video surveillance systems, including, without limitation, Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App, which infringe at least claim 7 of the '370 patent in violation of 35 U.S.C. § 271(a).

40. Without permission or authorization from Sensormatic and in violation of 35 U.S.C. § 271(b), Wyze induced and continues to induce the direct infringement of at least claim 7 of the '370 patent by aiding, abetting, and encouraging its customers' use of the Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App with knowledge of the infringement of the '370 patent and with the intent to cause such infringement.

41. For example, the following chart depicts and describes how a Wyze Cam, Wyze Cam Pan, and/or Wyze Sense, used in conjunction with the Wyze App, meet each and every claim limitation of claim 7 of the '370 patent:

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7. A surveillance system for wireless communication between components comprising:	<p>The Wyze Cam V1/V2, Wyze Cam Pan, Wyze Sense, and Wyze App executing on a mobile device are connected over Wi-Fi and cellular networks to provide a surveillance system for wireless communication.</p> <p><i>See, e.g., Say Hello to WyzeCam, https://youtu.be/kRytpc3q4Lw; Introducing Wyze Sense – Contact and Motion Sensors for Your Home, https://www.youtube.com/watch?v=rlp5f5jJPSk</i></p>
a base system including at least one wireless input capture device (ICD);	<p>The Wyze Cam V2, Wyze Cam Pan, Wyze Sense, and/or Wyze App are available for purchase at http://www.wyze.com. (The Wyze Cam V1 was previously available for purchase on the Wyze website.) The Wyze app can be downloaded and executed on a mobile device executing IOS or Android.</p> <p>The Wyze Cam V1/V2 and/or Wyze Cam Pan can capture video, audio, and still images.</p> <p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won't miss a thing.” • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.”

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	<p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7” CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.” • “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.” <p><i>See also “Wyze Cam Setup” video</i> https://www.youtube.com/watch?v=BB5oXEQZw4U</p> <p>The Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.</p> <p>From the Wyze Sense Setup Guide https://support.wyzecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide):</p> <ul style="list-style-type: none"> • “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it’s within 2 cm of this switch. <p>The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high.”</p>
<p>a DIR having a processor, a memory, a transmitter/receiver,</p>	<p>Upon information and belief, the Wyze system contains a DIR including a processor, a memory, and a transmitter/receiver that records and stores the content collected by the ICD.</p> <p>From “Wyze Cam Setup” video https://www.youtube.com/watch?v=BB5oXEQZw4U):</p> <ul style="list-style-type: none"> • At 0:48 – “And now you’re logged in and given a plus sign. This’ll let you add new devices and connect your camera to your account. When you’re ready for setup, turn the camera over, and press the button until you hear ‘Ready to connect.’ Once you’ve heard that, press ‘Next’ on the app. You will then need to put in your Wi-Fi info. Once you’re connected to your network, you tap this button [indicating ‘Next’] to get

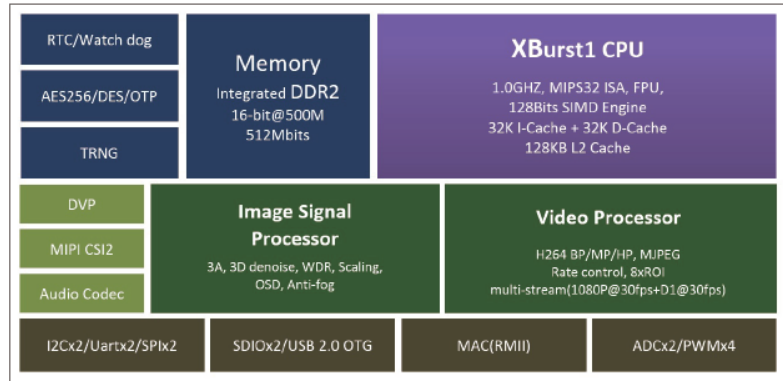
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	<p>the QR code. Hold your phone steady, about five inches away [from the camera]. It should scan the QR code in a few seconds.... Once it is successfully scanned, you will hear ‘QR code scanned. Please wait.’ Press this button [stating ‘I heard QR code scanned. Please wait’], and Wyze Cam will finish the setup on its own. The LED light indicator on the back [of the camera] will start flashing yellow and blue, then flashing blue, and when setup is complete, it turns to a solid blue and says, ‘Setup complete.’ Name your camera, and you’re good to go.”</p> <p>From “Making the Most of the Wyze Cam Live Stream” video (https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 1:55 – “Next to that is the record video button where you can record a video clip from the livestream to your phone. The clip will record as long as you like, but it will end if you exit the livestream. The next button to the right is the voice button, which is how you use the two-way audio. Now this feature works more like a walkie-talkie than a phone. You press the button, hold it down to speak, and then let the button go to listen, so you aren’t able to speak and hear sound through the Wyze Cam at the same time. Next button is ‘take photo.’ It does about exactly what you’d expect by taking a snapshot of the video feed that you’re looking at. Your videos and your photos can then be found in your album.”
and operable for wireless communication with the ICD(s) and a remote server computer (RSC);	<p>A mobile device executing the Wyze App can store videos, show event reports, and manage and control the camera. Additionally, upon information and belief, Wyze maintains servers which Wyze systems communicate with and store and serve content to the Wyze App from. The Wyze Cam, Wyze Cam Pan, and Wyze Sense wirelessly communicate with the mobile device executing the Wyze App via 2.4 GHz Wi-Fi.</p> <p>Regarding the Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols” <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app,

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	<p>activate the sensor, and it's ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes."</p> <p>From "Making the Most of the Wyze Cam Live Stream" video (https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none">• At 0:07 – "The devices tab shows all your connected devices with a thumbnail of the last streaming session. Just press on the thumbnail of the camera you want to see, and you'll jump into a new livestream. You should see a live feed video from your Wyze Cam."• At 0:35 – "Above the video feed in the top left corner there's an HD/SD toggle. HD/SD affects your video quality by causing your Wyze Cam to switch between high definition (HD) and standard definition (SD)."• At 0:57 – "On the right side you'll find night vision. Night vision turns your video gray and makes use of the camera's infrared lights so you can see in the dark. By tapping the button, you can toggle the night vision on, off, or put it on auto, and as you'd expect, auto switches night vision on automatically as it gets dark." <p>From "Wyze Cam Alert Settings" video (https://www.youtube.com/watch?v=qCIXbkygGkg):</p> <ul style="list-style-type: none">• At 0:24 – "Alert settings are made on an individual camera basis, so to find them, you'll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you'll see three types of settings. Right at the top you'll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you're allowing Wyze Cam to send you push notifications."• At 1:09 – "In order to manage the number of notifications you receive, we've given you a way to reduce the sensitivity of your motion detection between low, medium, and high."• At 1:17 – "The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high."• At 1:53 – "Following your motion and sound settings are your

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	<p>smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren't older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.”</p> <ul style="list-style-type: none"> • At 2:19 – “The last thing here is the alert schedule. With the alert schedule you can set up a start time and end time to receive alerts. So if you don't need alerts if you're already home in the evening or something, you can schedule them to automatically turn off when you get home from work. Select your desired start time and end time through the scrolling number wheels, and you will only receive alerts within that time frame.”
<p>wherein the ICD(s) having at least one sensor and at least one input component for detecting and recording inputs, a processor, a memory, a transmitter/receiver, all constructed and configured in electronic connection;</p>	<p>The Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images from a target environment.</p> <p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won't miss a thing.” • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.” <p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.” • “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.” <p>Each of the Wyze Cam V1/V2 and Wyze Cam Pan has an embedded DSP chip that runs software. Examples include the Ingenic T20 Smart Video Processor.</p>

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T20 Block Diagram



See *T20 FHD Smart Video Processor Datasheet T20_P8.pdf*
ftp://ftp.ingenic.com/SOC/T20/T20_PB.PDF

Each camera has a transmitter/receiver. For example, each Wyze Cam V1/V2 and/or Wyze Cam Pan transmits and receives via Wi-Fi using a Wi-Fi Chip.

Regarding the Wyze Cam and Wyze Cam Pan (from <https://www.wyze.com/wyze-cam> and <https://www.wyze.com/wyze-cam-pan>):

- “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols”

The Wyze Cam V1/V2 and the Wyze Cam Pan can record inputs from a user sent from a mobile device executing the Wyze app.

From “Wyze Cam Alert Settings” video (<https://www.youtube.com/watch?v=qCIXbkygGkg>)

- At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.”
- At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of your motion detection between low, medium, and high.”

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	<ul style="list-style-type: none"> • At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.” • At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.” <p>The Wyze Cam V1/V2 and the Wyze Cam Pan can also record video and/or audio in response to detecting an event or a user pressing a record button on a mobile device executing the Wyze app.</p> <p>From “Wyze Cam Alert Settings” video https://www.youtube.com/watch?v=qCIXbkygGkg)</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.” <p>From “Making the Most of the Wyze Cam Live Stream” video https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 1:55 – “Next to that is the record video button where you can record a video clip from the livestream to your phone. The clip will record as long as you like, but it will end if you exit the livestream.” <p>The Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.</p> <p>From the Wyze Sense Setup Guide</p>

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(<https://support.wysecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide>):

- “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it’s within 2 cm of this switch.

The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high.”

The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.

From <https://www.wyze.com/wyze-sense>:

- “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.”

From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video

(<https://www.youtube.com/watch?v=rlp5f5jJPSk>):

- At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes.”

The Wyze app can be used to set a notification when the motion sensor detects movement or the contact sensor registers as open.

From <https://support.wysecam.com/hc/en-us/articles/360030468852-Events-and-Notifications>:

- “You can set the Wyze app to send a Notifications when a

U.S. Pat. No. 7,936,370	
	<p>Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this:</p> <ol style="list-style-type: none"> 1. Open the Wyze app 2. Tap the sensor's listing on your Home tab to access the Device Screen 3. Tap the SettingsGear icon in the top right 4. Tap Notifications 5. Select when you want to receive Push Notifications from your sensor <ul style="list-style-type: none"> ○ For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open ○ For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear 6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”
<p>wherein the ICDs are operable for wireless direct cross-communication with each other and with the DIR without requiring interaction with the RSC for operation,</p>	<p>The Wyze contact sensors and Wyze motion sensors communicate wirelessly and directly with the Wyze Cam/Wyze Cam Pan, including the DIR, using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.” <p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video (https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> • At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes. So one of the great

U.S. Pat. No. 7,936,370

things about using Wyze Cam as our connection to Wi-Fi is that we can also record a sensor readout. With the sensor readout, we can easily pair the sensor to the camera where we can let the camera record a video when something's triggered. So if you have a Wyze Cam pointed at the front door with a contact sensor, you don't have to get a notification when the dog walks by or a family member walks by. You'll get a notification when the door is opened. And only when the door is opened you can see who exactly walked in."

The Wyze Cam V1/V2 and/or Wyze Cam Pan automatically captures and uploads an event video to Amazon Web Services ("AWS") without requiring interaction with the mobile device executing the Wyze App. The events can be determined and recorded based on inputs to the Wyze contact sensors and Wyze motion sensors wirelessly communicated to the Wyze Cam/Wyze Cam Pan via the RF bridge without requiring interaction with the mobile device executing the Wyze App.

From the Wyze Cam User's Guide

(<https://support.wysecam.com/hc/en-us/articles/360022543292-Wyze-Cam-User-s-Guide>):

- "When any of the Event detection types are turned on, your Wyze Cam will automatically record a 12-second Event video that is saved to the Cloud. These Event videos can be viewed for up to 14 days in the Events tab of the Wyze App. After 14 days, Event videos are deleted and cannot be recovered."

From the Wyze Sense Setup Guide

(<https://support.wysecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide>):

- "The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it's within 2 cm of this switch.

The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high."

From <https://support.wysecam.com/hc/en-us/articles/360030468852-Events-and-Notifications>:

U.S. Pat. No. 7,936,370	
	<ul style="list-style-type: none"> • “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this: <ol style="list-style-type: none"> 1. Open the Wyze app 2. Tap the sensor's listing on your Home tab to access the Device Screen 3. Tap the SettingsGear icon in the top right 4. Tap Notifications 5. Select when you want to receive Push Notifications from your sensor <ul style="list-style-type: none"> ○ For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open ○ For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear 6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”
<p>wherein the direct cross-communication includes data exchange, and wherein the data exchange includes input data and information about the surveillance environment, settings, inputs, and combinations thereof;</p>	<p>As noted above, the Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan via the RF bridge. The Wyze contact sensors and Wyze motion sensors communicate inputs (e.g., an open contact, moving heat in the field-of-view) to the Wyze Cam/Wyze Cam Pan, which can be set to record an event video in response to the input. These inputs inherently include information about the surveillance environment (e.g., whether something has broken the contacts, whether there is motion in the field-of-view).</p> <p>From the Wyze Sense Setup Guide (https://support.wysecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide):</p> <ul style="list-style-type: none"> • “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it’s within 2 cm of this switch. <p>The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high.”</p>

U.S. Pat. No. 7,936,370	
	<p>From https://support.wysecam.com/hc/en-us/articles/360030468852-Events-and-Notifications:</p> <ul style="list-style-type: none"> • “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this: <ol style="list-style-type: none"> 1. Open the Wyze app 2. Tap the sensor's listing on your Home tab to access the Device Screen 3. Tap the SettingsGear icon in the top right 4. Tap Notifications 5. Select when you want to receive Push Notifications from your sensor <ul style="list-style-type: none"> ○ For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open ○ For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear 6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”
<p>and wherein the ICD is operable to encode inputs in two formats simultaneously via a DSP running software.</p>	<p>Each of the Wyze Cam V1/V2 and Wyze Cam Pan Cam has an embedded DSP chip. Upon information and belief, an exemplary chip includes the Ingenic T20 Smart Video Processor.</p> <p>Video Encoder</p> <ul style="list-style-type: none"> ◆ Max resolution 2048x2048 ◆ Up to H264 1080P@40fps encode ◆ H264 multiple streams <ul style="list-style-type: none"> 1080P@30fps+D1@30fps+JPEG@15fps 2048x1536@25fps+D1@25fps+JPEG@15fps 2048x2048@15fps+D1@15fps+JPEG@15fps ◆ Smart H.264 ◆ ABR/VBR/CBR/CQP, 8 ROIs ◆ 5-layer OSD <p>Integration XBurst, ultra-low power CPU technology, the Ingenic T20 smart video processor is the most popular solution for the video and intelligent analysis device. T20 is a high performance video processor. It has high level ISP and H.264 encoding technology, maximum resolution up to 3MP, and CPU frequency up to 1.0GHz, with MXU2.0(SIMD128) instruction. T20 integrated audio codec and 64MB/128MB DDR2, can make hardware design easily and shorten the time to market.</p> <p><i>See T20 FHD Smart Video Processor Datasheet T20_P8.pdf</i> (ftp://ftp.ingenic.com/SOC/T20/T20_PB.PDF)</p>

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The Wyze Cam/Wyze Cam Pan records video in HD and, if set by the mobile device executing the Wyze App, can simultaneously convert the video to SD, e.g., for live streaming to the mobile device and recording event videos.

From the Wyze Cam User's Guide

(<https://support.wysecam.com/hc/en-us/articles/360022543292-Wyze-Cam-User-s-Guide>):

- “HD stands for high-definition video and SD stands for standard-definition video. The HD/SD setting does not impact the image quality of the video. All videos are recorded in 1080p. Instead, HD/SD controls the compression levels of the videos for storage. SD will compress the video more than HD, which means that it is squeezing the 1080p videos down into a smaller package for storage. It does this by layering images of static objects over each other and only updating moving objects. A side effect of this is that the video may not appear to move as smoothly as it would in HD, as objects like shadows may not update as often. If the camera is primarily saving updated data in SD, it reduces how much internet speed affects video consistency and footage will also take up less space on a microSD card.

Unlike HD/SD, 360p will impact the image quality and lower the resolution of the live stream to 480x360. All videos are also recorded in 360p, including local recording onto a microSD card. This feature is intended for users without access to high speed internet or that wish to reduce the amount of data the camera consumes. Note: this feature is only available for Wyze Cam v2 and Wyze Cam Pan.

To switch between HD, SD, and 360p settings, tap into your camera's Live Stream and tap the HD/SD/360p icon above the feed.”

Additionally, if provided with a microSD card, the Wyze Cam/Wyze Cam Pan can simultaneously record video and time lapse photos.

From the Wyze Cam User's Guide

(<https://support.wysecam.com/hc/en-us/articles/360022500271-MicroSD-Card-Playback-and-Time-Lapse>):

- “A time lapse video is a series of photos taken by your Wyze Cam over a period of time and shown in quick succession. A time lapse can be captured simultaneously with continuous recording.”

42. Sensormatic reserves the right to modify its infringement theories as discovery progresses in this case; it shall not be estopped for infringement contention or claim construction purposes by the information contained herein. This chart is intended to satisfy the notice requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure; it does not represent Sensormatic's preliminary or final infringement contentions or preliminary or final claim construction positions.

43. Wyze's infringement of the '370 patent has been and continues to be willful and deliberate.

44. Wyze's conduct has caused and will continue to cause Sensormatic substantial damage, including irreparable harm, for which Sensormatic has no adequate remedy at law, unless and until Wyze is enjoined from infringing the '370 patent.

COUNT IV

INFRINGEMENT OF UNITED STATES PATENT NO. 8,208,019

45. Sensormatic repeats and realleges each and every allegation contained in paragraphs 1-17, inclusive, as though fully set forth herein.

46. The '019 patent is valid and enforceable.

47. Since at least August 19, 2019, Wyze has had notice of the '019 patent and Sensormatic's infringement allegations relating to the same.

48. Without permission or authorization from Sensormatic, Wyze has manufactured, offered for sale, and sold and continues to manufacture, offer for sale, and sell certain video surveillance systems, including, without limitation, Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App, which infringe at least claim 7 of the '019 patent in violation of 35 U.S.C. § 271(a).

49. Without permission or authorization from Sensormatic and in violation of 35 U.S.C. § 271(b), Wyze induced and continues to induce the direct infringement of at least claim 7 of the '019 patent by aiding, abetting, and encouraging its customers' use of the Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App with knowledge of the infringement of the '019 patent and with the intent to cause such infringement.

50. For example, the following chart depicts and describes how Wyze Cam, Wyze Cam Pan, and/or Wyze Sense, used in conjunction with the Wyze App, meet each and every claim limitation of claim 7 of the '019 patent:

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<p>7. A surveillance system having removable data storage comprising:</p>	<p>The Wyze Cam V1/V2, Wyze Cam Pan, Wyze Sense, and Wyze App executing on a mobile device are connected over Wi-Fi and cellular networks to provide a surveillance system for wireless communication.</p> <p><i>See, e.g., Say Hello to WyzeCam, https://youtu.be/kRytpc3q4Lw; Introducing Wyze Sense – Contact and Motion Sensors for Your Home, https://www.youtube.com/watch?v=rlp5f5jJPSk.</i></p> <p>Each Wyze Cam and Wyze Cam Pan can include a removable microSD card.</p> <p>Regarding Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “Local Storage: Supports 8GB, 16GB and 32GB microSD cards in FAT32 format”
<p>a base system including at least one wireless input capture device (ICD), the ICD(s) having at least one sensor and at least one input component for detecting and recording inputs, a processor, a memory, a transmitter/receiver, all constructed and configured in electronic connection;</p>	<p>The Wyze Cam V2 and/or Wyze Cam Pan are available for purchase at http://www.wyze.com. (The Wyze Cam V1 was previously available for purchase on the Wyze website.) The Wyze app can be downloaded and executed on a mobile device executing IOS or Android.</p> <p>The Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images from a target environment.</p> <p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won’t miss a thing.” • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.” <p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens.

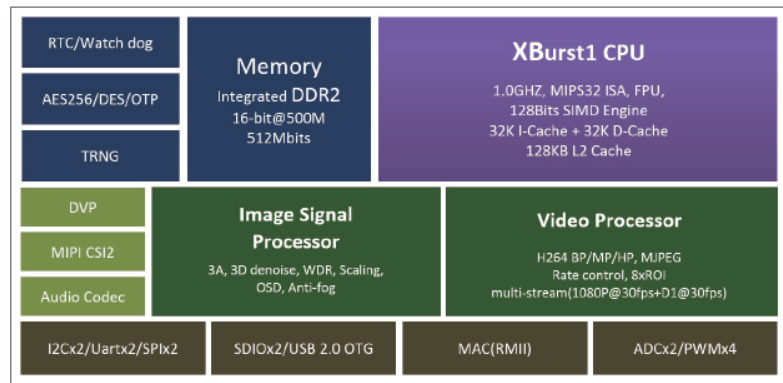
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Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.”

- “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.”

Each of the Wyze Cam V1/V2 and Wyze Cam Pan has an embedded DSP chip that runs software. For example, upon information and belief, some of the Wyze ICDs include the Ingenic T20 Smart Video Processor.

T20 Block Diagram



See T20 FHD Smart Video Processor Datasheet T20_P8.pdf (ftp://ftp.ingenic.com/SOC/T20/T20_PB.PDF).

Each camera has a transmitter/receiver. For example, each Wyze Cam V1/V2 and/or Wyze Cam Pan transmits and receives via Wi-Fi using a Wi-Fi Chip.

Regarding the Wyze Cam and Wyze Cam Pan (from <https://www.wyze.com/wyze-cam> and <https://www.wyze.com/wyze-cam-pan>):

- “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols”

The Wyze Cam V1/V2 and the Wyze Cam Pan can record inputs from a user sent from a mobile device executing the Wyze app.

From “Wyze Cam Alert Settings” video

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	<p>https://www.youtube.com/watch?v=qCIXbkygGkg</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.” • At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of your motion detection between low, medium, and high.” • At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.” • At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.” <p>The Wyze Cam V1/V2 and the Wyze Cam Pan can also record video and/or audio in response to detecting an event or a user pressing a record button on a mobile device executing the Wyze app.</p> <p>From “Wyze Cam Alert Settings” video https://www.youtube.com/watch?v=qCIXbkygGkg</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on

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motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you're allowing Wyze Cam to send you push notifications."

From "Making the Most of the Wyze Cam Live Stream" video (<https://www.youtube.com/watch?v=VP6jUsrQxLY>):

- At 1:55 – "Next to that is the record video button where you can record a video clip from the livestream to your phone. The clip will record as long as you like, but it will end if you exit the livestream."

The Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.

From the Wyze Sense Setup Guide

(<https://support.wyze.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide>):

- "The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it's within 2 cm of this switch.

The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high."

The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.

From <https://www.wyze.com/wyze-sense>:

- "Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it's ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes."

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	<p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> • At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes.” <p>The Wyze app can be used to set a notification when the motion sensor detects movement or the contact sensor registers as open.</p> <p>From https://support.wyzecam.com/hc/en-us/articles/360030468852-Events-and-Notifications:</p> <ul style="list-style-type: none"> • “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this: <ol style="list-style-type: none"> 1. Open the Wyze app 2. Tap the sensor's listing on your Home tab to access the Device Screen 3. Tap the SettingsGear icon in the top right 4. Tap Notifications 5. Select when you want to receive Push Notifications from your sensor <ul style="list-style-type: none"> ○ For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open ○ For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear 6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”
wherein the ICDs are operable for wireless	Upon information and belief, the Wyze system contains a DIR that records and stores the content collected by the ICD. The DIR records

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<p>direct cross-control of surveillance area settings and cross-communication with each other and a digital input recorder (DIR),</p>	<p>and stores the content collected by the ICD and can communicate settings and controls to the ICDs. The Wyze Cam V1/V2 and/or Wyze Cam Pan communicate, via the DIR, with the Wyze app executing on the mobile iOS or Android device via a 2.4 GHz Wi-Fi connection.</p> <p>Regarding the Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols” <p>The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.” <p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video (https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> • At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes. So one of the great things about using Wyze Cam as our connection to Wi-Fi is that we can also record a sensor readout. With the sensor readout, we can easily pair the sensor to the camera where we can let the camera record a video when something’s triggered. So if you have a Wyze Cam pointed at the front door with a contact sensor, you don’t have to get a notification when the

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dog walks by or a family member walks by. You'll get a notification when the door is opened. And only when the door is opened you can see who exactly walked in."

Additionally, the Wyze Cam, Wyze Cam Pan, and Wyze Cam Sense surveillance area settings can be adjusted through the Wyze App on the mobile device. The Wyze App allows for adjustment of camera settings, via the DIR, such as resolution and the capture of still images, as examples. Changes to the resolution are directly transmitted from the Wyze App to the camera via the DIR and 2.4 GHZ Wi-Fi connection.

From "Wyze Cam Alert Settings" video

(<https://www.youtube.com/watch?v=qCIXbkygGkg>)

- At 0:24 – "Alert settings are made on an individual camera basis, so to find them, you'll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you'll see three types of settings. Right at the top you'll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you're allowing Wyze Cam to send you push notifications."
- At 1:09 – "In order to manage the number of notifications you receive, we've given you a way to reduce the sensitivity of your motion detection between low, medium, and high."
- At 1:17 – "The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high."
- At 1:53 – "Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren't older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens."

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	<ul style="list-style-type: none">• At 2:19 – “The last thing here is the alert schedule. With the alert schedule you can set up a start time and end time to receive alerts. So if you don’t need alerts if you’re already home in the evening or something, you can schedule them to automatically turn off when you get home from work. Select your desired start time and end time through the scrolling number wheels, and you will only receive alerts within that time frame.” <p>From https://support.wysecam.com/hc/en-us/articles/360030468852-Events-and-Notifications:</p> <ul style="list-style-type: none">• “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this:<ol style="list-style-type: none">1. Open the Wyze app2. Tap the sensor's listing on your Home tab to access the Device Screen3. Tap the SettingsGear icon in the top right4. Tap Notifications5. Select when you want to receive Push Notifications from your sensor<ul style="list-style-type: none">○ For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open○ For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”

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<p>wherein the cross-communication of ICDs and DIR includes data exchange, and wherein the data exchange includes information about the surveillance environment,</p>	<p>Upon information and belief, the Wyze system contains a DIR that records and stores the content collected by the ICD and can communicate settings and controls to the ICDs. The Wyze Cam V1/V2 and/or Wyze Cam Pan communicate, via the DIR, with the Wyze App executing on the mobile iOS or Android device via a 2.4 GHz Wi-Fi connection. The Wyze App allows for adjustment of camera settings, via the DIR, such as resolution and the capture of still images, as examples. The communication with the Wyze Cam and/or Wyze Cam Pan include the audio, video, and/or still photos, which is information about the surveillance environment. Additionally, the communication can include a smoke or carbon monoxide status of the surveillance environment.</p> <p>From “Wyze Cam Alert Settings” video https://www.youtube.com/watch?v=qCIXbkygGkg</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.” • At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.” • At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.” <p>Additionally, the Wyze Sense includes two contact sensors and one</p>

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	<p data-bbox="522 243 1445 317">motion sensor that determine motion in a target environment and can be used to send notifications to the mobile device.</p> <p data-bbox="522 369 1445 478">From the Wyze Sense Setup Guide (https://support.wysecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide):</p> <ul data-bbox="522 491 1445 636" style="list-style-type: none"><li data-bbox="522 491 1445 636">• “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it’s within 2 cm of this switch. <p data-bbox="522 688 1445 909">The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high.”</p> <p data-bbox="522 961 1445 1035">From https://support.wysecam.com/hc/en-us/articles/360030468852-Events-and-Notifications:</p> <ul data-bbox="522 1047 1445 1812" style="list-style-type: none"><li data-bbox="522 1047 1445 1812">• “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this:<ol data-bbox="522 1234 1445 1812" style="list-style-type: none"><li data-bbox="522 1234 1445 1272">1. Open the Wyze app<li data-bbox="522 1276 1445 1350">2. Tap the sensor's listing on your Home tab to access the Device Screen<li data-bbox="522 1354 1445 1392">3. Tap the SettingsGear icon in the top right<li data-bbox="522 1396 1445 1434">4. Tap Notifications<li data-bbox="522 1438 1445 1512">5. Select when you want to receive Push Notifications from your sensor<ul data-bbox="522 1516 1445 1686" style="list-style-type: none"><li data-bbox="522 1516 1445 1589">○ For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open<li data-bbox="522 1593 1445 1686">○ For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear<li data-bbox="522 1690 1445 1812">6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”

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<p>and wherein the direct cross-control includes the direct exchange of set triggers and trigger events, settings, inputs, and combinations thereof;</p>	<p>The control of the Wyze Cam, Wyze Cam Pan, and/or Wyze Sense includes setting triggers to cause events to be recorded.</p> <p>From “Wyze Cam Alert Settings” video (https://www.youtube.com/watch?v=qCIXbkygGkg)</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.” • At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of your motion detection between low, medium, and high.” • At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.” • At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.” • At 2:19 – “The last thing here is the alert schedule. With the alert schedule you can set up a start time and end time to receive alerts. So if you don’t need alerts if you’re already home in the evening or something, you can schedule them to automatically turn off when you get home from work. Select your desired start time and end time through the scrolling number wheels, and you will only receive alerts within that time frame.”

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From <https://support.wysecam.com/hc/en-us/articles/360030468852-Events-and-Notifications>:

- “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open. You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this:
 1. Open the Wyze app
 2. Tap the sensor's listing on your Home tab to access the Device Screen
 3. Tap the SettingsGear icon in the top right
 4. Tap Notifications
 5. Select when you want to receive Push Notifications from your sensor
 - For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open
 - For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear
 6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”

The user can also adjust settings and other inputs using the Wyze app, such as whether to record video in HD/SD.

From “Making the Most of the Wyze Cam Live Stream” video (<https://www.youtube.com/watch?v=VP6jUsrQxLY>):

- At 0:07 – “The devices tab shows all your connected devices with a thumbnail of the last streaming session. Just press on the thumbnail of the camera you want to see, and you’ll jump into a new livestream. You should see a live feed video from your Wyze Cam.”
- At 0:35 – “Above the video feed in the top left corner there’s an HD/SD toggle. HD/SD affects your video quality by causing your Wyze Cam to switch between high definition (HD) and standard definition (SD).”
- At 0:57 – “On the right side you’ll find night vision. Night vision turns your video gray and makes use of the camera’s infrared lights so you can see in the dark. By tapping the button, you can toggle the night vision on, off, or put it on

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	<p>auto, and as you'd expect, auto switches night vision on automatically as it gets dark.”</p>
<p>an external removable storage device connected to the DIR and/or ICD(s), operable to receive transferred or copied data associated with inputs captured by the ICD(s) including inputs captured by the ICD(s) data associated with image tagging or flagging based upon the occurrence of a trigger event, and</p>	<p>Each Wyze Cam and Wyze Cam Pan can include a removable microSD card.</p> <p>Regarding Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “Local Storage: Supports 8GB, 16GB and 32GB microSD cards in FAT32 format” <p>The Wyze app can be used to configure the Wyze Cam and/or Wyze Cam Pan with a microSD card to record video continuously or to only record alerts to the microSD card.</p> <p>From “How to Use Continuous Recording with a MicroSD Card” video (https://www.youtube.com/watch?v=7Bo10pUTfwQ):</p> <ul style="list-style-type: none"> • At 0:05 – “To use these settings, insert a microSD card in the small slot underneath the Wyze Cam.” • At 0:42 – “Once you’ve inserted the microSD card, hop back into your Wyze app, and once you’ve jumped into an individual Wyze Cam, click on the gear icon in the top right corner. And this time we’re going to select ‘Advanced Settings.’ Right at the top you’ll see ‘Local recording to micro SD Card.’... With a microSD card correctly recognized, you’ll be able to choose between ‘Record alerts only’ and ‘Continuous recording.’ Recording alerts only is similar to the alert videos that are saved to the cloud, but they’re saved to your microSD card, and they’re saved in one-minute increments instead of 15-second increments. There isn’t a cool down period for these, though, so if you have an event that lasts longer than one minute, your Wyze Cam will also save the next minute’s footage, and that will keep going until the camera no longer detects motion or sound.” • At 2:15 – “Continuous recording, on the other hand, will tell your Wyze Cam to constantly record video to your microSD card 24/7. Anything that happens in front of a Wyze Cam at any point will be captured.” <p>Additionally, the mobile device executing the Wyze app can be used to record video, audio, and/or still images locally. This can include videos recorded as a result of a detected event. Local storage on the</p>

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	<p>mobile device (such as a microSD card) can then be operable to receive the recorded video, audio, and/or still images.</p> <p>From “Making the Most of the Wyze Cam Live Stream” video (https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 1:55 – “Next to that is the record video button where you can record a video clip from the livestream to your phone. The clip will record as long as you like, but it will end if you exit the livestream.” <p>From “How to Access Wyze Cam Alert Videos” video (https://www.youtube.com/watch?v=GlmFA81-d3k):</p> <ul style="list-style-type: none"> • At 1:26 – “Next to each alert video, you can see if it was triggered by motion or by sound, as well as the time that the video was recorded. To the right there’s this generic thumbnail with a play button on it. Just tap that play button to view the alert video...and down below you have options to...share the clip....”
<p>the system is operable to activate data transfer automatically if a trigger event is detected by any of the ICDs, wherein the trigger event is automatically by the system at any of the ICD(s) and includes a predefined input captured by at least one of the ICDs; thereby providing for data storage and transfer from the surveillance system.</p>	<p>The Wyze Cam and/or Wyze Cam Pan automatically uploads an event video to AWS.</p> <p>From the Wyze Cam User’s Guide (https://support.wyze.com/hc/en-us/articles/360022543292-Wyze-Cam-User-s-Guide):</p> <ul style="list-style-type: none"> • “When any of the Event detection types are turned on, your Wyze Cam will automatically record a 12-second Event video that is saved to the Cloud. These Event videos can be viewed for up to 14 days in the Events tab of the Wyze App. After 14 days, Event videos are deleted and cannot be recovered.” <p>The user can also receive alerts if the Wyze Sense contact sensor or motion sensor is triggered. In these instances, the user can further receive video of the trigger.</p> <p>From https://support.wyze.com/hc/en-us/articles/360030468852-Events-and-Notifications:</p> <ul style="list-style-type: none"> • “You can set the Wyze app to send a Notifications when a Motion Sensor detected movement or the Contact Sensor has been registered as open.” <p>From https://support.wyze.com/hc/en-us/articles/360030471332-</p>

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Sensor-Videos:

- “Wyze Sense lets you record a video with your Wyze Cam whenever a sensor is triggered. Any Sensor in your account can trigger any Wyze Cam on the same account.”

Moreover, the Wyze Cam and/or Wyze Cam Pan can be set to record event videos to a microSD card.

From “How to Use Continuous Recording with a MicroSD Card” video (<https://www.youtube.com/watch?v=7Bo10pUTfwQ>):

- At 1:15 – “With a microSD card correctly recognized, you’ll be able to choose between ‘Record alerts only’ and ‘Continuous recording.’ Recording alerts only is similar to the alert videos that are saved to the cloud, but they’re saved to your microSD card, and they’re saved in one-minute increments instead of 15-second increments. There isn’t a cool down period for these, though, so if you have an event that lasts longer than one minute, your Wyze Cam will also save the next minute’s footage, and that will keep going until the camera no longer detects motion or sound.”

Trigger events are determined by predefined inputs set by the user using the Wyze app on the mobile device.

From “Wyze Cam Alert Settings” video (<https://www.youtube.com/watch?v=qCIXbkygGkg>)

- At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.”
- At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of your motion detection between low, medium, and high.”
- At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can

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receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.”

- At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.”

From <https://support.wysecam.com/hc/en-us/articles/360030468852-Events-and-Notifications>:

- “You can toggle Notifications on/off for each sensor, in addition to your account's Settings. To do this:
 1. Open the Wyze app
 2. Tap the sensor's listing on your Home tab to access the Device Screen
 3. Tap the SettingsGear icon in the top right
 4. Tap Notifications
 5. Select when you want to receive Push Notifications from your sensor
 - For Contact Sensors, you can receive a notification whenever it Opens, Closes, and Is Left Open
 - For Motion Sensors, you can receive a notification whenever it Detects Motion or Becomes Clear
 6. You can select any or all of the different notifications types to better control the kind of notifications you receive from your sensor.”

From <https://support.wysecam.com/hc/en-us/articles/360030471332-Sensor-Videos>:

- “To set up a sensor to trigger Sensor Videos:
 1. Open the Wyze app
 2. Tap the sensor's listing on your Home tab to access the Device Screen
 3. Tap the SettingsGear icon in the top right

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	4. Tap Sensor Videos 5. Select as many Wyze Cams as you'd like to record a Sensor Video from the list 6. To finish, tap the arrow in the top left”

51. Sensormatic reserves the right to modify its infringement theories as discovery progresses in this case; it shall not be estopped for infringement contention or claim construction purposes by the information contained herein. This chart is intended to satisfy the notice requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure; it does not represent Sensormatic’s preliminary or final infringement contentions or preliminary or final claim construction positions.

52. Wyze’s infringement of the ’019 patent has been and continues to be willful and deliberate.

53. Wyze’s conduct has caused and will continue to cause Sensormatic substantial damage, including irreparable harm, for which Sensormatic has no adequate remedy at law, unless and until Wyze is enjoined from infringing the ’019 patent.

COUNT V

INFRINGEMENT OF UNITED STATES PATENT NO. 8,610,772

54. Sensormatic repeats and realleges each and every allegation contained in paragraphs 1-17, inclusive, as though fully set forth herein.

55. The ’772 patent is valid and enforceable.

56. Since at least August 19, 2019, Wyze has had notice of the ’772 patent and Sensormatic’s infringement allegations relating to the same.

57. Without permission or authorization from Sensormatic, Wyze has manufactured, offered for sale, and sold and continues to manufacture, offer for sale, and sell certain video

surveillance systems, including, without limitation, Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App, which infringe at least claim 1 of the '772 patent in violation of 35 U.S.C. § 271(a).

58. Without permission or authorization from Sensormatic and in violation of 35 U.S.C. § 271(b), Wyze induced and continues to induce the direct infringement of at least claim 1 of the '772 patent by aiding, abetting, and encouraging its customers' use of the Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App with knowledge of the infringement of the '772 patent and with the intent to cause such infringement.

59. For example, the following chart depicts and describes how Wyze Cam, Wyze Cam Pan, and/or Wyze Sense, used in conjunction with the Wyze App, meet each and every claim limitation of claim 1 of the '772 patent:

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1. A networked surveillance system, comprising:	<p>The Wyze Cam V1/V2, Wyze Cam Pan, Wyze Sense, and Wyze App executing on a mobile device are connected over Wi-Fi and cellular networks to provide a surveillance system for wireless communication.</p> <p><i>See, e.g., Say Hello to WyzeCam, https://youtu.be/kRytpc3q4Lw; Introducing Wyze Sense – Contact and Motion Sensors for Your Home, https://www.youtube.com/watch?v=rlp5f5jJPSk.</i></p>
a base system comprising at least one wireless input capture device ICD(s) and a corresponding digital input recorder (DIR) or another ICD;	<p>The Wyze Cam V2 and/or Wyze Cam Pan are available for purchase at http://www.wyze.com. (The Wyze Cam V1 was previously available for purchase on the Wyze website.) The Wyze app can be downloaded and executed on a mobile device executing IOS or Android.</p> <p>The Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images from a target environment.</p> <p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you

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	<p>won't miss a thing.”</p> <ul style="list-style-type: none"> • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.” <p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.” • “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.” <p>Each camera has a transmitter/receiver. For example, each Wyze Cam V1/V2 and/or Wyze Cam Pan transmits and receives via Wi-Fi using a Wi-Fi Chip.</p> <p>Regarding the Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols” <p>The Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.</p> <p>From the Wyze Sense Setup Guide (https://support.wysecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide):</p> <ul style="list-style-type: none"> • “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it's within 2 cm of this switch. <p>The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing</p>

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	<p>upright when placing the sensor and mounting the sensor at approximately 6 feet high.”</p> <p>The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.” <p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video (https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> • At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes.” <p>Upon information and belief, the Wyze system contains a DIR that records and stores the content collected by the ICD and can communicate settings and controls to the ICDs. The Wyze Cam V1/V2 and/or Wyze Cam Pan communicate, via the DIR, with the Wyze App executing on the mobile iOS or Android device via a 2.4 GHz Wi-Fi connection. The Wyze App allows for adjustment of camera settings, via the DIR, such as resolution and the capture of still images, as examples.</p>
<p>wherein the ICD(s) are operable for wireless cross-communication with other ICD(s), including communication for</p>	<p>The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into

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<p>adjustment of ICD settings and controls, without coupling through a remote server computer; and</p>	<p>the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it's ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.”</p> <p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn't have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That's why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes. So one of the great things about using Wyze Cam as our connection to Wi-Fi is that we can also record a sensor readout. With the sensor readout, we can easily pair the sensor to the camera where we can let the camera record a video when something's triggered. So if you have a Wyze Cam pointed at the front door with a contact sensor, you don't have to get a notification when the dog walks by or a family member walks by. You'll get a notification when the door is opened. And only when the door is opened you can see who exactly walked in.” <p>As noted in the above excerpt, the communication between the Wyze contact sensors and motion sensors and the Wyze Cam/Wyze Cam Pan can include activating video recording in response to the contact sensor/motion sensor being triggered.</p> <p>From https://support.wysecam.com/hc/en-us/articles/360030471332-Sensor-Videos:</p> <ul style="list-style-type: none"> “Any of the cameras that you have selected for that sensor will start recording if the sensor is triggered. Just like with Event Videos, any Sensor Videos will be a 12-second clip that is saved on the cloud for 14 days.”
<p>wherein each of the ICD(s) and DIR are set-up and activated with a single click-select</p>	<p>Each of the Wyze Cam and Wyze Cam Pan are set-up and activated after pressing the “plus” sign on the Wyze app on the mobile device.</p>

U.S. Pat. No. 8,610,772	
<p>command for providing an automatically networked surveillance system following the single click-select command activation.</p>	<p>From “Wyze Cam Setup” video (https://www.youtube.com/watch?v=BB5oXEQZw4U):</p> <ul style="list-style-type: none"> • At 0:48 – “And now you’re logged in and given a plus sign. This’ll let you add new devices and connect your camera to your account. When you’re ready for setup, turn the camera over, and press the button until you hear ‘Ready to connect.’ Once you’ve heard that, press ‘Next’ on the app. You will then need to put in your Wi-Fi info. Once you’re connected to your network, you tap this button [indicating ‘Next’] to get the QR code. Hold your phone steady, about five inches away [from the camera]. It should scan the QR code in a few seconds.... Once it is successfully scanned, you will hear ‘QR code scanned. Please wait.’ Press this button [stating ‘I heard QR code scanned. Please wait’], and Wyze Cam will finish the setup on its own. The LED light indicator on the back [of the camera] will start flashing yellow and blue, then flashing blue, and when setup is complete, it turns to a solid blue and says, ‘Setup complete.’ Name your camera, and you’re good to go.” <p>After the bridge is paired with a Wyze Cam/Wyze Cam Pan, the Wyze Sense contact sensor and motion sensor are set-up and activated after pressing the “Add a Product” button on the Wyze app on the mobile device.</p> <p>From https://support.wyze.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide:</p> <ul style="list-style-type: none"> • “Once the Bridge is paired, you can add a Motion or Contact Sensor to your account with the Wyze app. Follow these steps to add a sensor: <ol style="list-style-type: none"> 1. Open the Wyze app 2. Check your camera’s firmware to make sure it’s up to date <ol style="list-style-type: none"> 1. Go to Account tab on the bottom and then select the Firmware Upgrade. 3. From the Home Tab tap the [...] in the top right corner 4. Select “Add a Product” 5. Pick the sensor you want to add (Contact or Motion) 6. Use the included Reset Pin to poke the reset button on the sensor you’re adding, and hold it in until you see the red light flash at least 3 times 7. Name the sensor when prompted and test it out in the spot where you want to place it before using the adhesive backing.”

60. Sensormatic reserves the right to modify its infringement theories as discovery progresses in this case; it shall not be estopped for infringement contention or claim construction purposes by the information contained herein. This chart is intended to satisfy the notice requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure; it does not represent Sensormatic's preliminary or final infringement contentions or preliminary or final claim construction positions.

61. Wyze's infringement of the '772 patent has been and continues to be willful and deliberate.

62. Wyze's conduct has caused and will continue to cause Sensormatic substantial damage, including irreparable harm, for which Sensormatic has no adequate remedy at law, unless and until Wyze is enjoined from infringing the '772 patent.

COUNT VI

INFRINGEMENT OF UNITED STATES PATENT NO. 9,407,877

63. Sensormatic repeats and realleges each and every allegation contained in paragraphs 1-17, inclusive, as though fully set forth herein.

64. The '877 patent is valid and enforceable.

65. Since at least August 19, 2019, Wyze has had notice of the '877 patent and Sensormatic's infringement allegations relating to the same.

66. Without permission or authorization from Sensormatic, Wyze has manufactured, offered for sale, and sold and continues to manufacture, offer for sale, and sell certain video surveillance systems, including, without limitation, Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App, which infringe at least claim 16 of the '877 patent in violation of 35 U.S.C. § 271(a).

67. Without permission or authorization from Sensormatic and in violation of 35 U.S.C. § 271(b), Wyze induced and continues to induce the direct infringement of at least claim 16 of the '877 patent by aiding, abetting, and encouraging its customers' use of the Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App with knowledge of the infringement of the '877 patent and with the intent to cause such infringement.

68. For example, the following chart depicts and describes how Wyze Cam, Wyze Cam Pan, and/or Wyze Sense, used in conjunction with the Wyze App, meet each and every claim limitation of claim 16 of the '877 patent:

U.S. Pat. No. 9,407,877	
16. A networked surveillance system, comprising:	<p>The Wyze Cam V1/V2, Wyze Cam Pan, Wyze Sense, and Wyze App executing on a mobile device are connected over Wi-Fi and cellular networks to provide a surveillance system for wireless communication.</p> <p><i>See, e.g., Say Hello to WyzeCam, https://youtu.be/kRytpc3q4Lw; Introducing Wyze Sense – Contact and Motion Sensors for Your Home, https://www.youtube.com/watch?v=rlp5f5jJPSk.</i></p>
a base system comprising at least one wireless input capture device (ICD) and a corresponding digital input recorder (DIR) or another ICD;	<p>The Wyze Cam V2 and/or Wyze Cam Pan are available for purchase at http://www.wyze.com. (The Wyze Cam V1 was previously available for purchase on the Wyze website.) The Wyze app can be downloaded and executed on a mobile device executing IOS or Android.</p> <p>The Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images from a target environment.</p> <p>Upon information and belief, the Wyze system contains a DIR that records and stores the content collected by the ICD and can communicate settings and controls to the ICDs. The Wyze Cam V1/V2 and/or Wyze Cam Pan communicate, via the DIR, with the Wyze App executing on the mobile iOS or Android device via a 2.4 GHz Wi-Fi connection. The Wyze App allows for adjustment of camera settings, via the DIR, such as resolution and the capture of still images, as examples.</p>

U.S. Pat. No. 9,407,877

Regarding the Wyze Cam V2 (from <https://www.wyze.com/wyze-cam>):

- “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won’t miss a thing.”
- “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.”
- “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.”

Regarding the Wyze Cam Pan (from <https://www.wyze.com/wyze-cam-pan>):

- “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.”
- “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.”

Each camera has a transmitter/receiver. For example, each Wyze Cam V1/V2 and/or Wyze Cam Pan transmits and receives via Wi-Fi using a Wi-Fi Chip.

Regarding the Wyze Cam and Wyze Cam Pan (from <https://www.wyze.com/wyze-cam> and <https://www.wyze.com/wyze-cam-pan>):

- “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols”

The Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.

From the Wyze Sense Setup Guide (<https://support.wysecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide>):

- “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it’s within 2 cm of this switch.

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	<p>The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high.”</p> <p>The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.” <p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video (https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> • At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes.” <p>Upon information and belief, the Wyze system contains a DIR that records and stores the content collected by the ICD and can communicate settings and controls to the ICDs. The Wyze Cam V1/V2 and/or Wyze Cam Pan communicate, via the DIR, with the Wyze App executing on the mobile iOS or Android device via a 2.4 GHz Wi-Fi connection. The Wyze App allows for adjustment of camera settings, via the DIR, such as resolution and the capture of still images, as examples.</p>
wherein the ICD(s) are	The Wyze contact sensors and Wyze motion sensors communicate

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<p>operable for wireless cross-communication with other ICD(s), including communication for adjustment of ICD settings and controls,</p>	<p>directly with the Wyze Cam/Wyze Cam Pan using an RF bridge.</p> <p>From https://www.wyze.com/wyze-sense:</p> <ul style="list-style-type: none"> • “Wyze Sense piggybacks off the wifi connection from Wyze Cam, so setup is extra simple. Insert the included bridge into the back of a Wyze Cam, add a sensor in your Wyze app, activate the sensor, and it’s ready to go. One Bridge can support up to 100 Wyze sensors and has a signal range that will work throughout most US homes.” <p>From “Introducing Wyze Sense – Contact and Motion Sensors for Your Home” video (https://www.youtube.com/watch?v=rlp5f5jJPSk):</p> <ul style="list-style-type: none"> • At 2:36 – “The other thing that we knew is because [the contact and motion sensors] were battery powered, we couldn’t have the sensors connect direct to Wi-Fi. It would take too much battery, and they would only be able to last, you know, a couple weeks maybe. So we had to find a way to have a hub or some other type of communication. That’s why we chose to use the Wi-Fi from the Wyze Cam to make setup a breeze. You just plug the Wyze bridge into the Wyze Cam and then pair each sensor to that bridge. In total, the setup should take no more than 2-3 minutes. So one of the great things about using Wyze Cam as our connection to Wi-Fi is that we can also record a sensor readout. With the sensor readout, we can easily pair the sensor to the camera where we can let the camera record a video when something’s triggered. So if you have a Wyze Cam pointed at the front door with a contact sensor, you don’t have to get a notification when the dog walks by or a family member walks by. You’ll get a notification when the door is opened. And only when the door is opened you can see who exactly walked in.” <p>As noted in the above excerpt, the communication between the Wyze contact sensors and motion sensors and the Wyze Cam/Wyze Cam Pan can include activating video recording in response to the contact sensor/motion sensor being triggered.</p> <p>From https://support.wysecam.com/hc/en-us/articles/360030471332-Sensor-Videos:</p> <ul style="list-style-type: none"> • “Any of the cameras that you have selected for that sensor will start recording if the sensor is triggered. Just like with

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	Event Videos, any Sensor Videos will be a 12-second clip that is saved on the cloud for 14 days.”
wherein each of the ICD(s) and DIR are set-up and activated following input of a single click-select command from a remote server computer (RSC);	<p>Each of the Wyze Cam and Wyze Cam Pan are set-up and activated after pressing the “plus” sign on the Wyze app on the mobile device.</p> <p>From “Wyze Cam Setup” video (https://www.youtube.com/watch?v=BB5oXEQZw4U):</p> <ul style="list-style-type: none"> • At 0:48 – “And now you’re logged in and given a plus sign. This’ll let you add new devices and connect your camera to your account. When you’re ready for setup, turn the camera over, and press the button until you hear ‘Ready to connect.’ Once you’ve heard that, press ‘Next’ on the app. You will then need to put in your Wi-Fi info. Once you’re connected to your network, you tap this button [indicating ‘Next’] to get the QR code. Hold your phone steady, about five inches away [from the camera]. It should scan the QR code in a few seconds.... Once it is successfully scanned, you will hear ‘QR code scanned. Please wait.’ Press this button [stating ‘I heard QR code scanned. Please wait’], and Wyze Cam will finish the setup on its own. The LED light indicator on the back [of the camera] will start flashing yellow and blue, then flashing blue, and when setup is complete, it turns to a solid blue and says, ‘Setup complete.’ Name your camera, and you’re good to go.” <p>After the bridge is paired with a Wyze Cam/Wyze Cam Pan, the Wyze Sense contact sensor and motion sensor are set-up and activated after pressing the “Add a Product” button on the Wyze app on the mobile device.</p> <p>From https://support.wysecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide:</p> <ul style="list-style-type: none"> • “Once the Bridge is paired, you can add a Motion or Contact Sensor to your account with the Wyze app. Follow these steps to add a sensor: <ol style="list-style-type: none"> 1. Open the Wyze app 2. Check your camera’s firmware to make sure it’s up to date <ol style="list-style-type: none"> 1. Go to Account tab on the bottom and then select the Firmware Upgrade. 3. From the Home Tab tap the [...] in the top right corner 4. Select “Add a Product”

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	<p>5. Pick the sensor you want to add (Contact or Motion)</p> <p>6. Use the included Reset Pin to poke the reset button on the sensor you’re adding, and hold it in until you see the red light flash at least 3 times</p> <p>7. Name the sensor when prompted and test it out in the spot where you want to place it before using the adhesive backing.”</p>
<p>wherein each ICD is operable for direct cross-communication with other ICDs and the DIR after the single click-select command activation of the base system; and</p>	<p>Once activated, the Wyze Cam/Wyze Cam Pan can communicate with the Wyze Sense. Additionally, the system communicates with the Wyze App executed on the mobile device. More specifically, the Wyze Cam and Wyze Cam Pan communicate via 2.4 GHz Wi-Fi and DIR with a mobile device executing the Wyze App and Amazon Web Services (AWS) for storage of event videos.</p> <p>Regarding the Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols” <p>The Wyze contact sensors and Wyze motion sensors communicate directly with the Wyze Cam/Wyze Cam Pan using an RF bridge, as discussed above.</p>

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<p>wherein the RSC automatically provides for remote access to live and/or recorded audio and/or video for any ICD on any DIR, and</p>	<p>The mobile device and Wyze app provide access to the live and recorded video streams over Wi-Fi and cellular networks.</p> <p>From “Making the Most of the Wyze Cam Live Stream” video (https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 0:07 – “The devices tab shows all your connected devices with a thumbnail of the last streaming session. Just press on the thumbnail of the camera you want to see, and you’ll jump into a new livestream. You should see a live feed video from your Wyze Cam.” • At 1:53 – “You can toggle audio on and off with this sound button.” <p>From “How to Access Wyze Cam Alert Videos” video (https://youtu.be/GlmFA8l-d3k):</p> <ul style="list-style-type: none"> • At 0:45 – “Back in the Wyze app, in the main device screen, you can tap the notifications tab to access these alert videos. You’ll notice a drop-down list on the word ‘Alerts’ up at the top where you can filter alert videos by camera or just select all cameras.” • At 1:26 – “Next to each alert video, you can see if it was triggered by motion or by sound, as well as the time that the video was recorded. To the right there’s this generic thumbnail with a play button on it. Just tap that play button to view the alert video...and down below you have options to turn on the sound...”
<p>wherein control functions permit remote adjustments to any DIR or ICD settings remotely by corresponding single click-select action through a graphic user interface.</p>	<p>The Wyze App permits the user to control aspects of the camera using a single click-select operation. For example, the user can change from HD/SD/360.</p> <p>From “Making the Most of the Wyze Cam Live Stream” video (https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 0:35 – “Above the video feed in the top left corner there’s an HD/SD toggle. HD/SD affects your video quality by causing your Wyze Cam to switch between high definition (HD) and standard definition (SD).” • At 0:57 – “On the right side you’ll find night vision. Night vision turns your video gray and makes use of the camera’s infrared lights so you can see in the dark. By tapping the button, you can toggle the night vision on, off, or put it on auto, and as you’d expect, auto switches night vision on

U.S. Pat. No. 9,407,877	
	<p>automatically as it gets dark.”</p> <p>From “Wyze Cam Alert Settings” video https://www.youtube.com/watch?v=qCIXbkygGkg)</p> <ul style="list-style-type: none"> • At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.” • At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of your motion detection between low, medium, and high.” • At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.” • At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.”

69. Sensormatic reserves the right to modify its infringement theories as discovery progresses in this case; it shall not be estopped for infringement contention or claim construction purposes by the information contained herein. This chart is intended to satisfy the notice requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure; it does not represent

Sensormatic's preliminary or final infringement contentions or preliminary or final claim construction positions.

70. Wyze's infringement of the '877 patent has been and continues to be willful and deliberate.

71. Wyze's conduct has caused and will continue to cause Sensormatic substantial damage, including irreparable harm, for which Sensormatic has no adequate remedy at law, unless and until Wyze is enjoined from infringing the '877 patent.

COUNT VII

INFRINGEMENT OF UNITED STATES PATENT NO. 10,198,923

72. Sensormatic repeats and realleges each and every allegation contained in paragraphs 1-17, inclusive, as though fully set forth herein.

73. The '923 patent is valid and enforceable.

74. Since at least August 19, 2019, Wyze has had notice of the '923 patent and Sensormatic's infringement allegations relating to the same.

75. Without permission or authorization from Sensormatic, Wyze has manufactured, offered for sale, and sold and continues to manufacture, offer for sale, and sell certain video surveillance systems, including, without limitation, Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App, which infringe at least claim 1 of the '923 patent in violation of 35 U.S.C. § 271(a).

76. Without permission or authorization from Sensormatic and in violation of 35 U.S.C. § 271(b), Wyze induced and continues to induce the direct infringement of at least claim 1 of the '923 patent by aiding, abetting, and encouraging its customers' use of the Wyze Cam, Wyze Cam Pan, Wyze Sense, and the Wyze App with knowledge of the infringement of the '923 patent and with the intent to cause such infringement.

77. For example, the following chart depicts and describes how Wyze Cam, Wyze Cam Pan, and/or Wyze Sense, used in conjunction with the Wyze App, meet each and every claim limitation of claim 1 of the '923 patent:

U.S. Pat. No. 10,198,923	
<p>1. A networked surveillance system, comprising:</p>	<p>The Wyze Cam V1/V2, Wyze Cam Pan, and Wyze App executing on a mobile device are connected over Wi-Fi and cellular networks to provide a surveillance system for wireless communication.</p> <p><i>See, e.g., Say Hello to WyzeCam, https://youtu.be/kRytpc3q4Lw.</i></p>
<p>at least one wireless input capture device (ICD) and corresponding at least one digital input recorder (DIR);</p>	<p>The Wyze Cam V2 and/or Wyze Cam Pan are available for purchase at http://www.wyze.com. (The Wyze Cam V1 was previously available for purchase on the Wyze website.) The Wyze app can be downloaded and executed on a mobile device executing IOS or Android.</p> <p>The Wyze Cam V1/V2 and Wyze Cam Pan capture video, sound, and still images from a target environment.</p> <p>Regarding the Wyze Cam V2 (from https://www.wyze.com/wyze-cam):</p> <ul style="list-style-type: none"> • “2.8mm focal length. 110° wide angle lens. 1/2.9" CMOS sensor. 1920×1080 (1080p) full HD. Images so clear you won’t miss a thing.” • “Use the built-in speaker and microphone to listen and talk to your loved ones, furry friends, or visitors.” • “Capture the events of a day with beautiful time lapse videos. Simply schedule the start and end times as well as how often you want your camera to take a picture.” <p>Regarding the Wyze Cam Pan (from https://www.wyze.com/wyze-cam-pan):</p> <ul style="list-style-type: none"> • “3.5mm focal length. F2.3 aperture. 120° wide angle lens. Enhanced 1/2.7" CMOS sensor. Wyze Cam Pan delivers 1080p HD images with stunning clarity.” • “Listen and talk to anyone you care about while not at home. Unique mic design minimizes motor sounds while providing high quality audio. A Class-K audio power amplifier enables high speaker volume.” <p>Each camera has a transmitter/receiver. For example, each Wyze Cam V1/V2 and/or Wyze Cam Pan transmits and receives via Wi-Fi using a Wi-Fi Chip.</p> <p>Regarding the Wyze Cam and Wyze Cam Pan (from https://www.wyze.com/wyze-cam and https://www.wyze.com/wyze-cam-pan):</p>

U.S. Pat. No. 10,198,923	
	<p>cam-pan):</p> <ul style="list-style-type: none"> • “802.11 b/g/n 2.4GHz (Does not support 5GHz network) Supports WPA and WPA2 protocols” <p>The Wyze Sense includes two contact sensors and one motion sensor that determine motion in a target environment.</p> <p>From the Wyze Sense Setup Guide https://support.wyzecam.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide):</p> <ul style="list-style-type: none"> • “The Contact Sensor has two parts. The larger side houses the tech, with the magnetic switch being located on its straight edge. You can place the smaller part of the sensor in any orientation as long as it’s within 2 cm of this switch. <p>The Motion Sensor detects heat from objects moving at distances up to 26 feet and a horizontal detection angle of 120°. The sensor is designed to detect at a slight downward angle. For most cases, it's best to have the Wyze logo facing upright when placing the sensor and mounting the sensor at approximately 6 feet high.”</p>
<p>wherein the at least one ICD is operable for automatic communication for adjustment of ICD settings and controls remotely and/or for automatic communication with the at least one DIR for controlling other electronic devices;</p>	<p>The Wyze Cam and/or Wyze Cam Pan is operable for automatic communication with the Wyze App executing on the mobile device for adjustment of ICD settings and controls remotely via the Wyze App.</p> <p>From “Making the Most of the Wyze Cam Live Stream” video https://www.youtube.com/watch?v=VP6jUsrQxLY):</p> <ul style="list-style-type: none"> • At 0:07 – “The devices tab shows all your connected devices with a thumbnail of the last streaming session. Just press on the thumbnail of the camera you want to see, and you’ll jump into a new livestream. You should see a live feed video from your Wyze Cam.” • At 0:35 – “Above the video feed in the top left corner there’s an HD/SD toggle. HD/SD affects your video quality by causing your Wyze Cam to switch between high definition (HD) and standard definition (SD).” • At 0:57 – “On the right side you’ll find night vision. Night vision turns your video gray and makes use of the camera’s infrared lights so you can see in the dark. By tapping the button, you can toggle the night vision on, off, or put it on auto, and as you’d expect, auto switches night vision on

U.S. Pat. No. 10,198,923

automatically as it gets dark.”

From “Wyze Cam Alert Settings” video

(<https://www.youtube.com/watch?v=qCIXbkygGkg>)

- At 0:24 – “Alert settings are made on an individual camera basis, so to find them, you’ll need to be in a specific Wyze Cam and then tap the gear in the top right corner of the screen. This is the camera settings screen where you’ll see three types of settings. Right at the top you’ll see alert settings. Within alert settings you have the option to turn on motion detection. Turning it on means that this Wyze Cam, whenever it detects motion, will record a 12-15 second alert video, which it automatically uploads to the cloud, and then the cloud sends a notification to your phone as long as you’re allowing Wyze Cam to send you push notifications.”
- At 1:09 – “In order to manage the number of notifications you receive, we’ve given you a way to reduce the sensitivity of your motion detection between low, medium, and high.”
- At 1:17 – “The next setting is sound detection. Your Wyze Cam records audio as well as video, so if you like, you can receive a notification if your Wyze Cam hears something. Sound sensitivity can also be toggled between low, medium, and high.”
- At 1:53 – “Following your motion and sound settings are your smoke and carbon monoxide alarm detection settings. Wyze Cam has a smart sound recognition algorithm that can detect the unique tones associated with these emergency alarms as long as they aren’t older than 10 years old because those beeping patterns have changed in the last 10 years. So with the smoke and carbon monoxide detection turned on, your Wyze Cam will now send you push alerts if your smoke alarm goes off, if your house is on fire, or if something crazy happens.”
- At 2:19 – “The last thing here is the alert schedule. With the alert schedule you can set up a start time and end time to receive alerts. So if you don’t need alerts if you’re already home in the evening or something, you can schedule them to automatically turn off when you get home from work. Select your desired start time and end time through the scrolling number wheels, and you will only receive alerts within that time frame.”

Additionally, the Wyze Sense can be connected to the Wyze Cam/Wyze Cam Pan. The Wyze Cam/Wyze Cam Pan can be set to

U.S. Pat. No. 10,198,923	
	<p>automatically record a video, which is sent to the mobile device, when a contact sensor or a motion sensor of the Wyze Sense is activated.</p> <p>From https://support.wyzecam.com/hc/en-us/articles/360030471332-Sensor-Videos:</p> <ul style="list-style-type: none"> • “Wyze Sense lets you record a video with your Wyze Cam whenever a sensor is triggered. Any Sensor in your account can trigger any Wyze Cam on the same account. <p>To set up a sensor to trigger Sensor Videos:</p> <ol style="list-style-type: none"> 1. Open the Wyze app 2. Tap the sensor's listing on your Home tab to access the Device Screen 3. Tap the SettingsGear icon in the top right 4. Tap Sensor Videos 5. Select as many Wyze Cams as you'd like to record a Sensor Video from the list 6. To finish, tap the arrow in the top left” <p>Upon information and belief, the Wyze system contains a DIR that records and stores the content collected by the ICD and can communicate settings and controls to the ICDs. The Wyze Cam V1/V2 and/or Wyze Cam Pan communicate, via the DIR, with the Wyze App executing on the mobile iOS or Android device via a 2.4 GHz Wi-Fi connection. The Wyze App allows for adjustment of camera settings, via the DIR, such as resolution and the capture of still images, as examples.</p>
<p>wherein the at least one ICD and/or DIR are set-up and activated with a single click-select command via a remote user interface for providing an automatically networked surveillance system.</p>	<p>Each of the Wyze Cam and Wyze Cam Pan are set-up and activated after pressing the “plus” sign on the Wyze app on the mobile device.</p> <p>From “Wyze Cam Setup” video (https://www.youtube.com/watch?v=BB5oXEQZw4U):</p> <ul style="list-style-type: none"> • At 0:48 – “And now you’re logged in and given a plus sign. This’ll let you add new devices and connect your camera to your account. When you’re ready for setup, turn the camera over, and press the button until you hear ‘Ready to connect.’ Once you’ve heard that, press ‘Next’ on the app. You will then need to put in your Wi-Fi info. Once you’re connected to your network, you tap this button [indicating ‘Next’] to get the QR code. Hold your phone steady, about five inches away [from the camera]. It should scan the QR code in a few seconds.... Once it is successfully scanned, you will hear ‘QR

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	<p>code scanned. Please wait.’ Press this button [stating ‘I heard QR code scanned. Please wait’], and Wyze Cam will finish the setup on its own. The LED light indicator on the back [of the camera] will start flashing yellow and blue, then flashing blue, and when setup is complete, it turns to a solid blue and says, ‘Setup complete.’ Name your camera, and you’re good to go.”</p> <p>After the bridge is paired with a Wyze Cam/Wyze Cam Pan, the Wyze Sense contact sensor and motion sensor are set-up and activated after pressing the “Add a Product” button on the Wyze app on the mobile device.</p> <p>From https://support.wyze.com/hc/en-us/articles/360030765191-Wyze-Sense-Setup-Guide:</p> <ul style="list-style-type: none"> • “Once the Bridge is paired, you can add a Motion or Contact Sensor to your account with the Wyze app. Follow these steps to add a sensor: <ol style="list-style-type: none"> 1. Open the Wyze app 2. Check your camera’s firmware to make sure it’s up to date <ol style="list-style-type: none"> 1. Go to Account tab on the bottom and then select the Firmware Upgrade. 3. From the Home Tab tap the [...] in the top right corner 4. Select “Add a Product” 5. Pick the sensor you want to add (Contact or Motion) 6. Use the included Reset Pin to poke the reset button on the sensor you’re adding, and hold it in until you see the red light flash at least 3 times 7. Name the sensor when prompted and test it out in the spot where you want to place it before using the adhesive backing.”

78. Sensormatic reserves the right to modify its infringement theories as discovery progresses in this case; it shall not be estopped for infringement contention or claim construction purposes by the information contained herein. This chart is intended to satisfy the notice requirements of Rule 8(a)(2) of the Federal Rules of Civil Procedure; it does not represent Sensormatic’s preliminary or final infringement contentions or preliminary or final claim construction positions.

79. Wyze's infringement of the '923 patent has been and continues to be willful and deliberate.

80. Wyze's conduct has caused and will continue to cause Sensormatic substantial damage, including irreparable harm, for which Sensormatic has no adequate remedy at law, unless and until Wyze is enjoined from infringing the '923 patent.

REQUEST FOR RELIEF

Wherefore, Sensormatic prays for judgment as follows:

- A. For a judgment that Wyze has infringed the '129 patent;
- B. For a judgment that Wyze has infringed the '534 patent;
- C. For a judgment that Wyze has infringed the '370 patent;
- D. For a judgment that Wyze has infringed the '019 patent;
- E. For a judgment that Wyze has infringed the '772 patent;
- F. For a judgment that Wyze has infringed the '877 patent;
- G. For a judgment that Wyze has infringed the '923 patent;
- H. For an order preliminarily and permanently enjoining Wyze and its officers, directors, agents, employees, successors, and all persons in privity or active concert or participation with Wyze, directly or indirectly, from infringing the unexpired Patents-in-Suit;
- I. For a judgment and award that Wyze account for and pay to Sensormatic damages adequate to compensate for Wyze's infringement of the Patents-in-Suit, including lost profits but in no event less than a reasonable royalty;
- J. For a judgment and award of any supplemental damages sustained by Sensormatic for any continuing post-verdict infringement of the unexpired Patents-in-Suit until entry of final judgment with an accounting as needed;

K. For a finding that Wyze's infringement is willful and an award of increased damages for willful infringement pursuant to 35 U.S.C. § 284;

L. For an order finding that this case is exceptional under 35 U.S.C. § 285 and awarding Sensormatic its costs, expenses, and disbursements incurred in this action, including reasonable attorneys' fees as available by law to be paid by Wyze;

M. For an award of pre-judgment interest, post-judgment interest, and costs in this action; and

N. For an award of such other relief as this Court deems just and proper.

JURY DEMAND

Sensormatic demands a jury trial on all issues so triable.

ASHBY & GEDDES

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