

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

KAMINO LLC,

Plaintiff

v.

**HONEYWELL INTERNATIONAL INC,
AND RESIDEO TECHNOLOGY, INC.**

Defendants

Case No. 6:19-cv-00707

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Kamino LLC (“Plaintiff” or “Kamino”) hereby asserts the following claims for patent infringement against Defendants Honeywell International, Inc. (“Honeywell”) and Resideo Technology, Inc. (“Resideo”) (collectively “Defendants”), and alleges, on information and belief, as follows:

THE PARTIES

1. Kamino is a limited liability company organized and existing under the laws of the Texas with its principal place of business at 17330 Preston Road, Suite 200D, Dallas, Texas 75252.
2. Honeywell is a Delaware corporation with a regular established place of business at 115 Tabor Rd, Morris Plains, New Jersey, 07950.
3. Resideo is a Delaware Corporation with a regular established place of business at 901 E 6th St, Austin, TX 78702.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*

This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5. Defendants have committed acts of infringement in this judicial district.

6. Honeywell has a regular and established place of business in this judicial district in Austin, Texas at 3019 Alvin Devane Blvd # 430, Austin, TX 78741.

7. Resideo has a regular and established place of business in this judicial district in Austin, Texas at 901 E 6th St, Austin, TX 78702.

AUSTIN, Texas, Dec. 12, 2018 – Resideo Technologies, Inc. (**NYSE: REZI**) will establish its headquarters and a software development center at 901 E. Sixth St. in Austin. The state-of-the-art office building will become the new home for the smart home technology company and approximately 120 of its employees, including most of the company's executive leadership team. The headquarters, including a new customer experience center showcasing the latest products and technologies, is planned to open during the first half of 2019.



"The Lone Star State continues to attract the best and most innovative companies from every sector of the economy, and I am thrilled that Resideo has chosen to be a part of our success story," said Texas Gov. Greg Abbott. "With low taxes, reasonable regulations, and a strong workforce, Texas has created an economic environment that allows businesses to flourish. I thank Resideo for their investment, and I look forward to working together to keep Texas the premier state for economic opportunity."

<https://www.resideo.com/us/en/corporate/newsroom/all-articles/2018/november/07/resideo-announces-headquarters-location-in-austin-texas/>

8. On information and belief, the Court has personal jurisdiction over Defendants because Defendants have committed, and continue to commit, acts of infringement in the state of Texas, have conducted business in the state of Texas, and/or has engaged in continuous and systematic activities in the state of Texas.

9. On information and belief, Defendants' instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the Western District of Texas.

10. Venue is proper in the Western District of Texas pursuant to 28 U.S.C. § 11400(b).

THE PATENT-IN SUIT

11. On August 20, 2002, United States Patent No. 6,435,686 (the "'686 patent"), entitled "Light Conducting Plate for a Back Lighting Device and Back Lighting Device," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '686 patent is attached hereto as Exhibit A.

12. Kamino is the assignee and owner of the right, title and interest in and to the '686 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 6,435,686

13. Kamino repeats and realleges the allegations of paragraphs 1 through 12 as if fully set forth herein.

14. Claim 1 of the '686 Patent recites:

1. A light conducting plate for a back lighting device, comprising:

a light-inlet end face for introducing light emitted from a light source to be disposed facing said light conducting plate;

a reflecting face for reflecting the light introduced through said light-inlet end face; and

a light-outlet face disposed opposite to said reflecting face for allowing the light reflected from the reflecting face to emit therethrough,

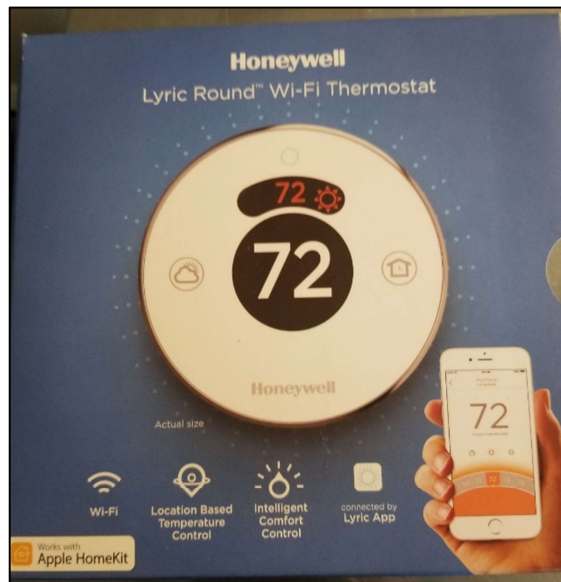
wherein said reflecting face includes a light-scattering region and a remainder region, and the remainder region is located on a side near to said light-inlet end face.

15. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendants have infringed and continues to infringe the '686 patent by making, using, importing, offering for sale, and/or selling mobile devices, such as the Honeywell Lyric Round Wi-Fi Thermostat and the Honeywell RTH9585WF Smart Color Thermostat (the "Accused Products").

16. Defendants have also infringed by inducing others, including their customers, to use and infringe the Accused Products by, for example, marketing and encouraging others to use the Accused Products and providing support for the Accused Products.

17. As exemplified below, the Honeywell Lyric Round Wi-Fi Thermostat includes a light conducting plate as claimed by the '686 Patent.

1. A light conducting plate for a back lighting device, comprising:



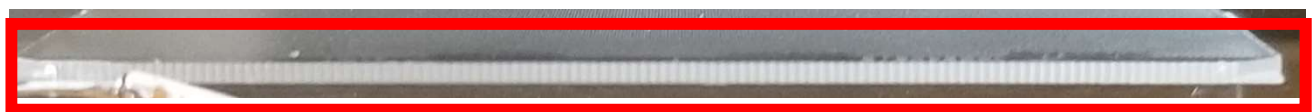
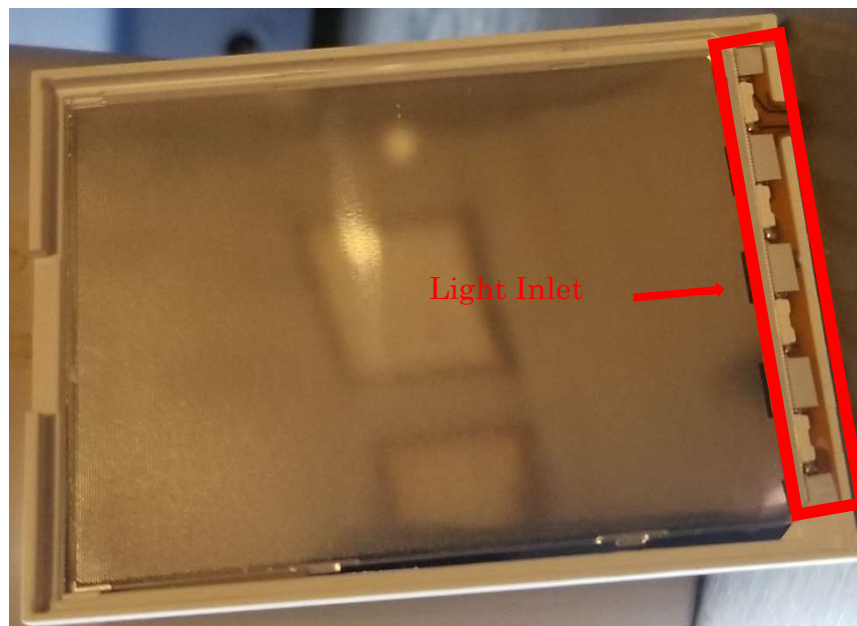
The light conducting plate of the Accused Instrumentality is part of display apparatus. The light conducting plate includes a light-inlet end face, a reflecting face, and a light outlet face. The reflecting face includes a light-scattering region and a remainder region

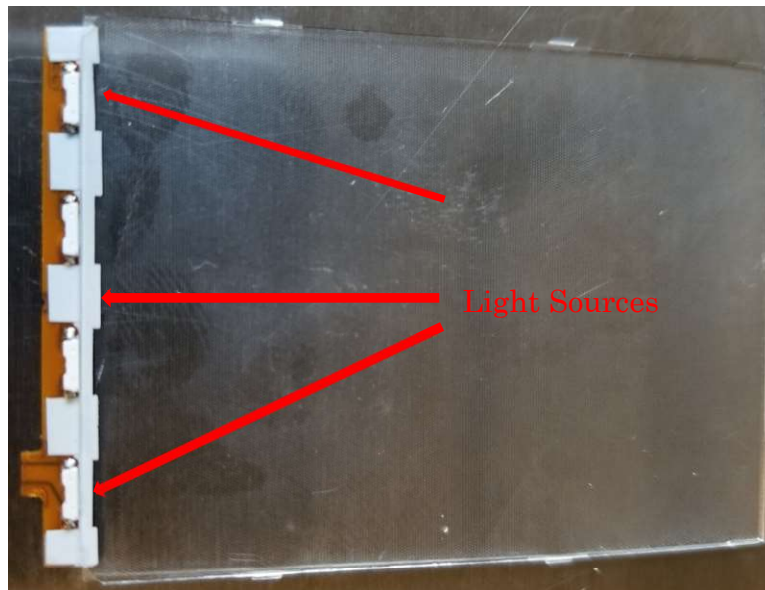




a light-inlet end face for introducing light emitted from a light source to be disposed facing said light conducting plate;

The Accused Instrumentality includes a light-inlet end face for introducing light emitted from a light source.

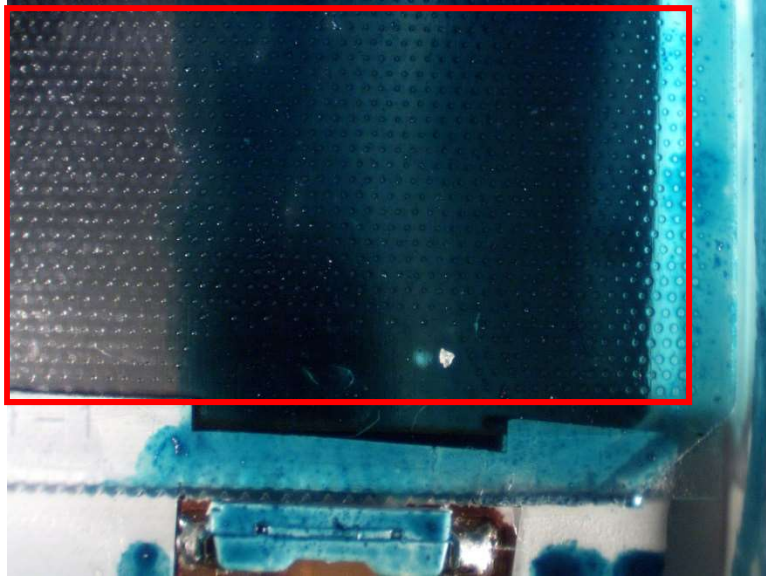




a reflecting face for reflecting the light introduced through said light-inlet end face; and

The Accused Instrumentality includes a reflecting face for reflecting the light introduced through the light-inlet end face.





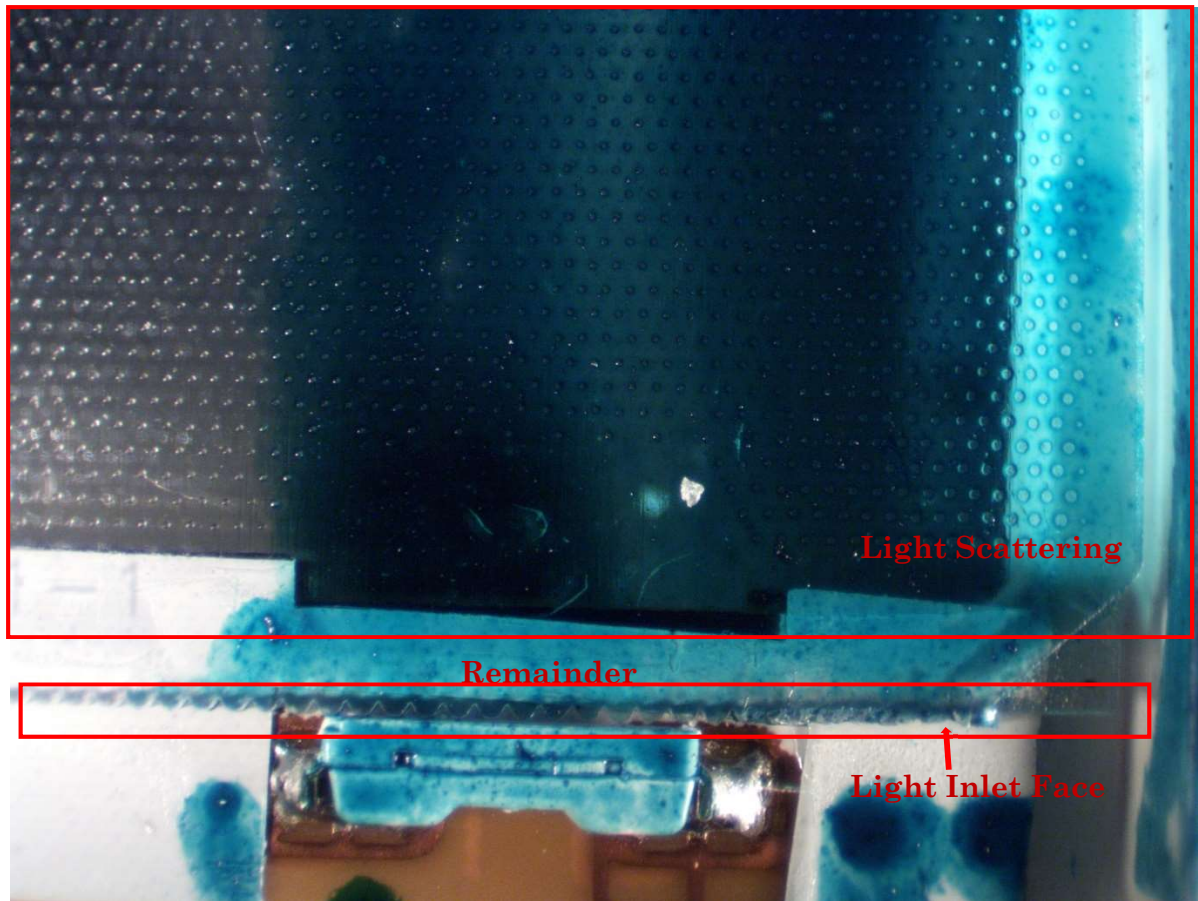
a light-outlet face disposed opposite to said reflecting face for allowing the light reflected from the reflecting face to emit therethrough,

The Accused Instrumentality includes a light-outlet face disposed opposite to the reflecting face for allowing the light reflected from the reflecting face to emit therethrough.



a light-outlet face disposed opposite to said reflecting face for allowing the light reflected from the reflecting face to emit therethrough,

The reflecting face includes a light-scattering region and a remainder region. The remainder region is located on a side near to the light-inlet face.



18. Kamino is entitled to recover from Defendant the damages sustained by Kamino as a result of Defendants' infringement of the '686 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

PRAYER FOR RELIEF

WHEREFORE, Kamino requests that this Court enter judgment against Defendant as follows:

- A. An adjudication that Defendant has infringed the '686 patent;
- B. An award of damages to be paid by Defendant adequate to compensate Kamino for Defendant's past infringement of the '686 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs,

expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

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

D. An award to Kamino of such further relief at law or in equity as the Court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury, Under Fed. R. Civ. P. 38.

Dated: December 13, 2019

Respectfully Submitted

/s/ Raymond W. Mort, III

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