IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAVANNAH LICENSING, LLC,	)	
Plaintiff,	)	
	)	**Civil Action No.**
v.	)	
	)	
SONY CORPORATION OF AMERICA	)	**JURY TRIAL DEMANDED**
Defendant.	)	

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Savannah Licensing, LLC ("Savannah") files this Original Complaint and demand for jury trial seeking relief from patent infringement of the claims of U.S. Patent Nos. 8,680,992 ("the '992 patent") and 9,454,777 ("the '777 patent") (referred to as the "Patents-in-Suit") by Sony Corporation of America ("Sony").

I.   THE PARTIES

1. Plaintiff Savannah is a Texas Limited Liability Company with its principal place of business located at 9901 Brodie Lane, Suite 160 PMB925, Austin, TX 78748.

2. On information and belief, Sony is a corporation organized and existing under the laws of the state of Delaware, with a principal place of business located at 25 Madison Avenue, New York City. On information and belief, Sony sells and offers to sell products and services throughout Delaware, including in this judicial district, and introduces products and services that perform infringing methods or processes into the stream of commerce knowing that they would be sold in Delaware and this judicial district. Sony can be served with process at its registered agent, THE CORPORATION TRUST COMPANY, CORPORATION TRUST CENTER 1209 ORANGE ST, Wilmington, DE 19801, or anywhere else it may be found.

II.   JURISDICTION AND VENUE

3. This Court has original subject-matter jurisdiction over the entire action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff's claim arises under an Act of Congress relating to patents, namely, 35 U.S.C. § 271.

4. This Court has personal jurisdiction over Defendant because: (i) Defendant is present within or has minimum contacts within the State of Delaware and this judicial district; (ii) Defendant has purposefully availed itself of the privileges of conducting business in the State of Delaware and in this judicial district; and (iii) Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Delaware and in this judicial district.

5. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b). Defendant has committed acts of infringement and is incorporated in Delaware. Further, venue is proper because Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in Delaware and this District.

III.   INFRINGEMENT

A. Infringement of the '992 Patent

6. On March 25, 2014, U.S. Patent No. 8,860,992 ("the '992 patent", included as an attachment and part of this Complaint) entitled "Measuring and Improving the Quality of a User Experience" was duly and legally issued by the U.S. Patent and Trademark Office. Savannah owns the '992 patent by assignment.

7. The '992 patent provide an apparatus and associated systems and methods for improving a user's experience.

8.   Sony designs, manufactures, markets and sells systems and processes for providing user feedback from a device, that infringe one or more claims of the '992 patent, including one or more of claims 1-29, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the '992 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant's procurement of monetary and commercial benefit from it.

9.   Support for the allegations of infringement may be found in the following preliminary table:

US8680992	Sony Xperia 1 II ("The accused product")
1. A method for providing feedback from a device, the method comprising:	The accused product practices, at least in internal testing and usage, a method for providing feedback from a device (e.g., the accused product). As shown below, the accused product comes preloaded with a map app, Google Maps, for navigation and positioning. The map app included with the accused product practices a method of providing feedback from a device (e.g., the accused product).

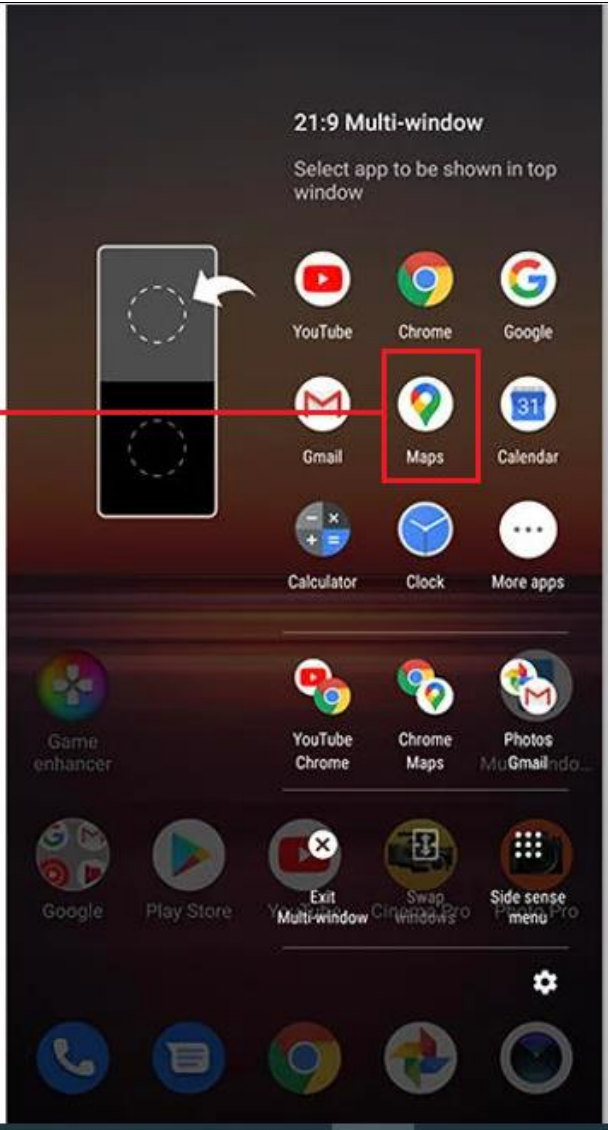https://electronics.sony.com/mobile/smartphone/all/p/xqat51-b

Setting up a Google account on your device

Your device from Sony runs on the Android platform developed by Google. A range of Google applic services is available on your device when you purchase it, for example, Gmail, Google Maps, YouTu Google Play application. To get the most out of these services, you need a Google account. For exa account enables you to do the following:

https://helpguide.sony.net/mobile/xperia-1m2/v1/en/contents/TP0003057506.html

ne 21:9 aspect ratio

usual screen in portrait

becomes viable. To

provides a utility called

Pairs of pre-configured

pe / Chrome sit alongside

ecific apps from a list. It's

nd **The map app used by**

the **the accused product**

g the camera capabilities

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humans and animals that

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much more usable than

n. What you won't find is

nctionality that inevitably

tware loses its grip -- or,

guably gimmicky features.

hones sporting four or

https://www.zdnet.com/product/sony-xperia-1-ii/

Steps to send us feedback

We're always looking for ways to improve Google Maps and would love to hear from you. Tell us what you don't like, or about bugs you've found. If you think something should be removed for l submit a legal request.

Types of feedback you can send

When you send feedback, you can tell us about three kinds of things:

- Your experience using Maps: Learn how to send feedback below.
- Wrong map information: Learn how to report a data problem.
- Missing map information: Learn how to add a missing place or a missing address.

https://support.google.com/maps/answer/3094045?co=GENIE.Platform%3DAndroid&oco=1

Computer   Android   iPhone & iPad

Send feedback about Maps

To tell us about your experience using Maps, follow the steps below.

1. On your Android phone or tablet, open the Google Maps app 📍.
2. Tap your profile picture or initial 👤 ＞ Help & feedback.
3. Select a feedback option.

https://support.google.com/maps/answer/3094045?co=GENIE.Platform%3DAndroid&oco=1

detecting a user frustration event;	The accused product practices, at least in internal testing and usages, a method of detecting a user frustration event (e.g., detecting shaking of the accused product enabled with the map app). As shown below, when an issue, which incites user frustration, occurred at the interface of the map app of the accused product while using it, the user can provide feedback about the issue. The map app of the accused product provides a feature, shake the device, to provide the feedback. The shaking action gets detected by the map app of the accused product and it generates a pop-up option to select for sending the feedback. When the user selects a feedback message to be sent, at the pop-up option, the map app of the accused product generates a feedback message package which includes information regarding the issue such as screenshots of the app to show where issue occurred, text, other addition information, etc. The user can send this message to the server of the map app of the accused product. **Shake Your Device to Send Feedback** I can openly admit that shaking a device is my least favorite way to acc almost anything ever. However, the new "shake to send feedback" feat perfect. If you're looking for a place on your device and Google gives y incorrect information or sends you down the wrong road, the first thir going to do is yell and shake your phone violently. Now, when you do get a handy box prompting you to tell Google exactly what it did wron to fix it. How very accommodating. https://lifehacker.com/the-best-changes-to-the-new-google-maps-for-android-731434697

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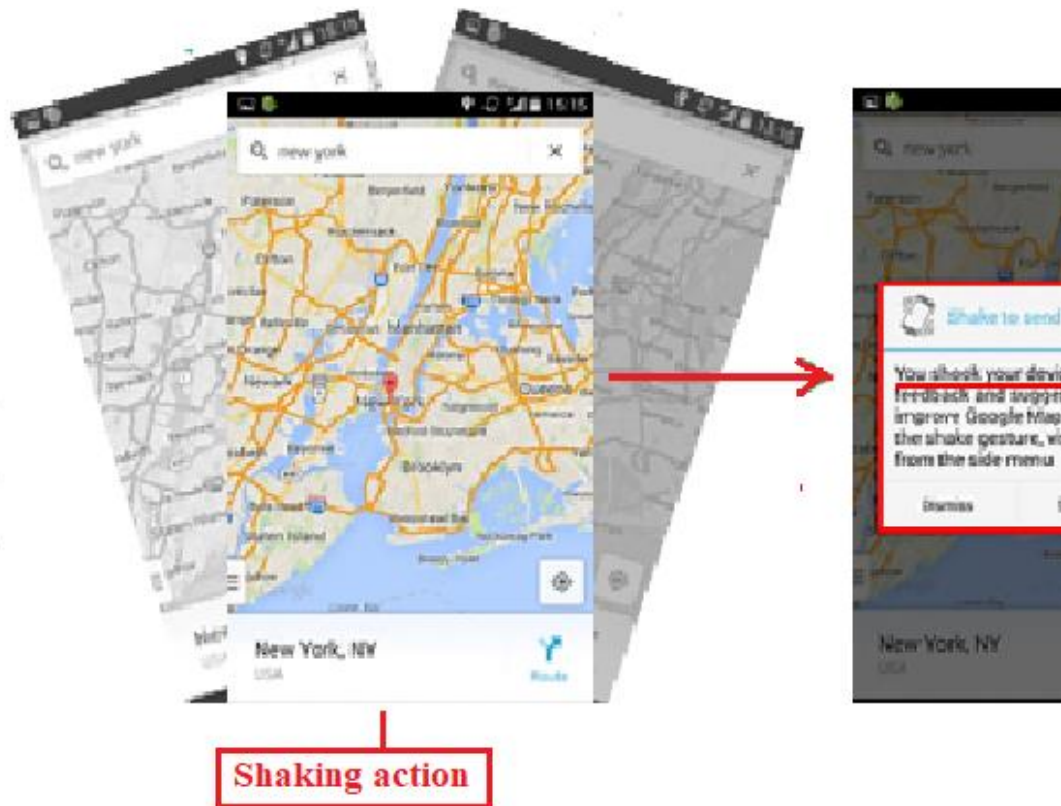2. Tap your profile picture or initial ● > Help & feedback.
3. Select a feedback option.

Shake to send feedback on your phone or tablet

You can shake your phone or tablet to send us feedback. This captures a screenshot of your Goog
to help us understand what is going on. You can remove this screenshot if it's not needed.

To turn "shake to send feedback" on or off, follow the steps below.

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3. Check the box or switch on "Shake to send feedback."

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Shaking action

Shake to send feedback

The fastest way is just by shaking your device while you're experiencing a problem. This ca[...] a screenshot of your current Google Maps screen to give us context for your feedback. You [...] also have the option to remove this screenshot if it is not necessary.

1. Shake your device, then click **Send feedback**.
2. Select **Send app feedback**.
3. Enter any information that might help in our review process. You can optionally in[...] system data, a screenshot, and/or your account information to help Google Maps [...] address your feedback.
4. Hit **Preview**, then **Send**.

https://support.google.com/gmm/answer/3143996?hl=en&ref_topic=3495971

| associating the user frustration event with a device event that includes an active operation of the device at a time when the user frustration event occurred; | The accused product practices, at least in internal testing and usages, a method of associating the user frustration event (e.g., shaking the accused product enabled with the map app) with a device event (e.g., selecting feedback on a pop-up message) that includes an active operation of the device (e.g., active operation of the accused product) at a time when the user frustration event (e.g., shaking the accused product enabled with the map app) occurred.

As shown below, when an issue, which incites user frustration, occurred at the interface of the map app of the accused product while using it, the user can provide feedback about the issue. The map app of the accused product provides a feature, shake the device, in order to provide the feedback. The shaking action gets detected by the map app of the accused product and it generates a pop-up option to select for sending the feedback. When the user selects a feedback message to be sent, at the pop-up option, the map app of the accused product generates a feedback message package which includes information regarding the issue such as screenshots of the app to show where issue occurred, text, other addition information, etc. The user can send this message to the server of the map app of the accused product. |

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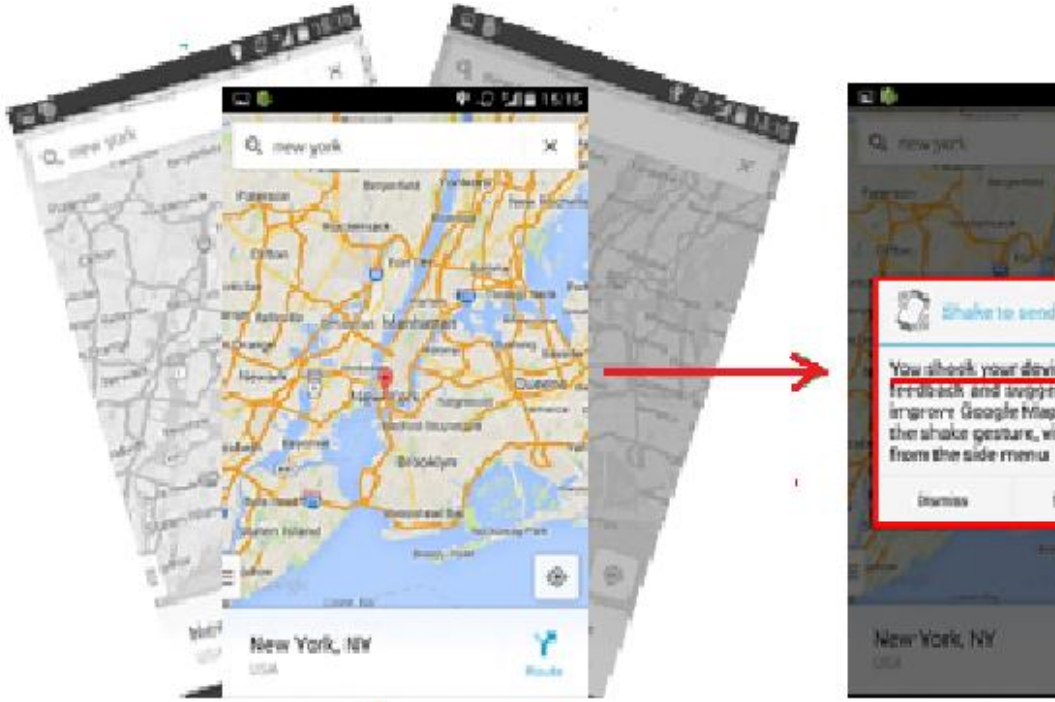3. Select a feedback option.

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1. Shake your device, then click **Send feedback**.
2. Select **Send app feedback**.
3. Enter any information that might help in our review process. You can optionally in system data, a screenshot, and/or your account information to help Google Maps address your feedback.
4. Hit **Preview**, then **Send**.

https://support.google.com/gmm/answer/3143996?hl=en&ref_topic=3495971

forming an event	The accused product practices, at least in internal testing and usages, a method of forming an event package (e.g., a feedback message) based at least in part on the

12

package based at least in part on the user frustratio n event and the device event that includes informati on indicating a level, a type of user frustratio n, and informati on related to routing the event package through a network; and	user frustration event (e.g., shaking the accused product enabled with the map app) and the device event (e.g., selecting feedback on a pop-up message) that includes information indicating a level, a type of user frustration, and information related to routing (e.g., IP address of the server of the map app of the accused product) the event package (e.g., a feedback message) through a network (e.g., Internet). As shown below, when an issue, which incites user frustration, occurred at the interface of the map app of the accused product while using it, the user can provide feedback about the issue. The map app of the accused product provides a feature, shake the device, in order to provide the feedback. The shaking action gets detected by the map app of the accused product and it generates a pop-up option to select for sending the feedback. When the user selects a feedback message to be sent, at the pop-up option, the map app of the accused product generates a feedback message package which includes information regarding the issue such as screenshots of the app to show where issue occurred, text, other addition information, etc. The user can send this message to the server of the map app of the accused product. ## Shake Your Device to Send Feedback I can openly admit that shaking a device is my least favorite way to acc almost anything ever. However, the new "shake to send feedback" feat perfect. If you're looking for a place on your device and Google gives y incorrect information or sends you down the wrong road, the first thir going to do is yell and shake your phone violently. Now, when you do t get a handy box prompting you to tell Google exactly what it did wrong to fix it. How very accommodating. https://lifehacker.com/the-best-changes-to-the-new-google-maps-for-android-731434697

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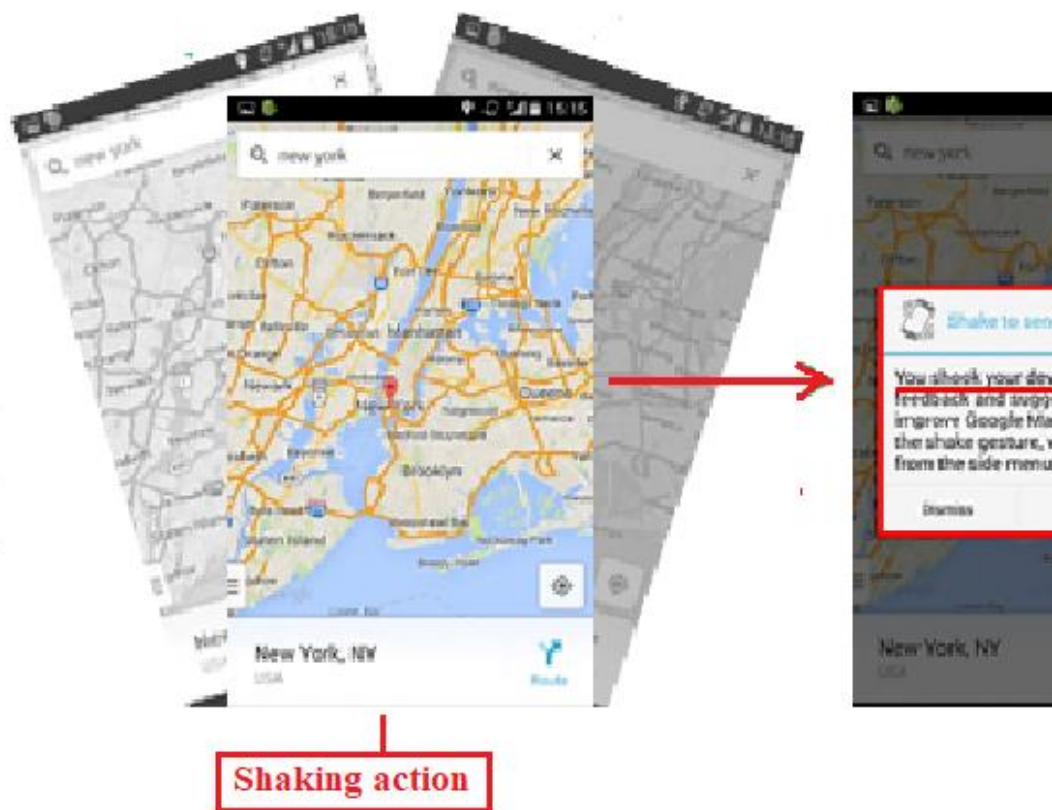2. Tap your profile picture or initial 👤 > Help & feedback.
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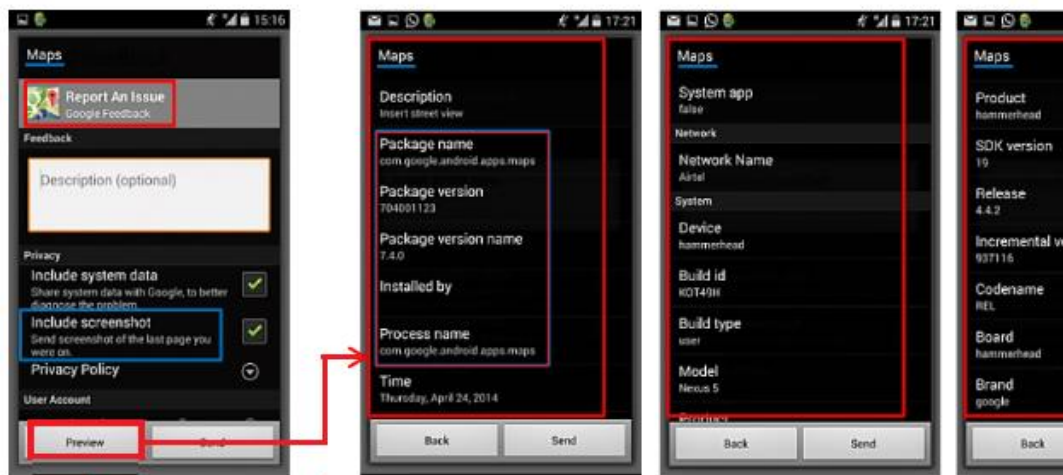3. Check the box or switch on "Shake to send feedback."

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transmitting the event package.	The accused product practices, at least in internal testing and usages, transmitting the event package (e.g., sending of feedback message). As shown below, when an issue, which incites user frustration, occurred at the interface of the map app of the accused product while using it, the user can provide feedback about the issue. The map app of the accused product provides a feature, shake the device, in order to provide the feedback. The shaking action gets detected by the map app of the accused product and it generates a pop-up option to select for sending the feedback. When the user selects a feedback message to be sent, at the pop-up option, the map app of the accused product generates a feedback message package which includes information regarding the issue such as screenshots of the app to show where issue occurred, text, other addition information, etc. The user can send this message to the server of the map app of the accused product.

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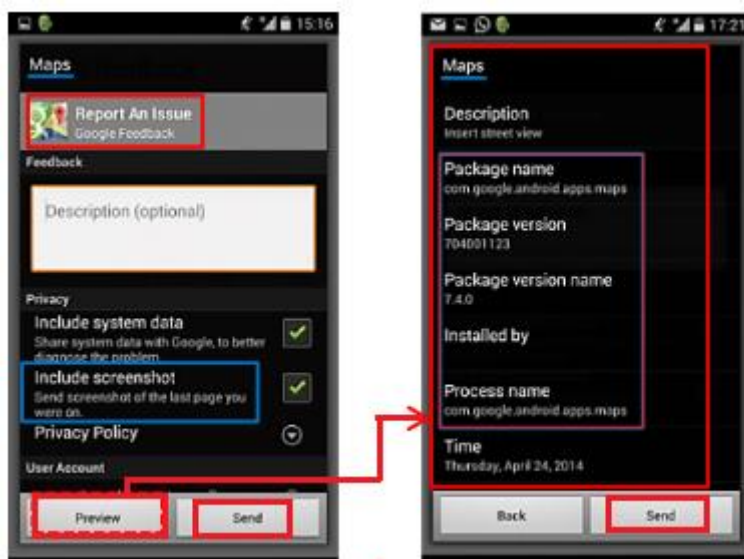https://support.google.com/maps/answer/3094045?co=GENIE.Platform%3DAndroid&oco=1

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4. Hit **Preview**, then **Send**.

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10. These allegations of infringement are preliminary and are therefore subject to change. For instance, there are other of Defendant's products that infringe.

11. Sony has and continues to induce infringement. Sony has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., systems and processes for providing user feedback)

such as to cause infringement of one or more of claims 1–29 of the '992 patent, literally or under the doctrine of equivalents. Moreover, Sony has known of the '992 patent and the technology underlying it from at least the filing date of the lawsuit.[1] For clarity, direct infringement is previously alleged in this complaint.

12. Sony has and continues to contributorily infringe. Sony has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., systems and processes for providing user feedback) such as to cause infringement of one or more of claims 1–29 of the '992 patent, literally or under the doctrine of equivalents. Further, there are no substantial noninfringing uses for Defendant's products and services. Moreover, Sony has known of the '992 patent and the technology underlying it from at least the filing date of the lawsuit.[2] For clarity, direct infringement is previously alleged in this complaint.

13. Sony has caused and will continue to cause Savannah damage by direct and indirect infringement of (including inducing infringement of) the claims of the '992 patent.

B. Infringement of the '777 Patent

14. On September 27, 2017, U.S. Patent No. 9,454,777 ("the '777 patent", included as an attachment and part of this Complaint) entitled "Measuring and Improving the Quality of a User Experience Upon Receiving a Frustration Event Package" was duly and legally issued by the U.S. Patent and Trademark Office. Savannah owns the '777 patent by assignment.
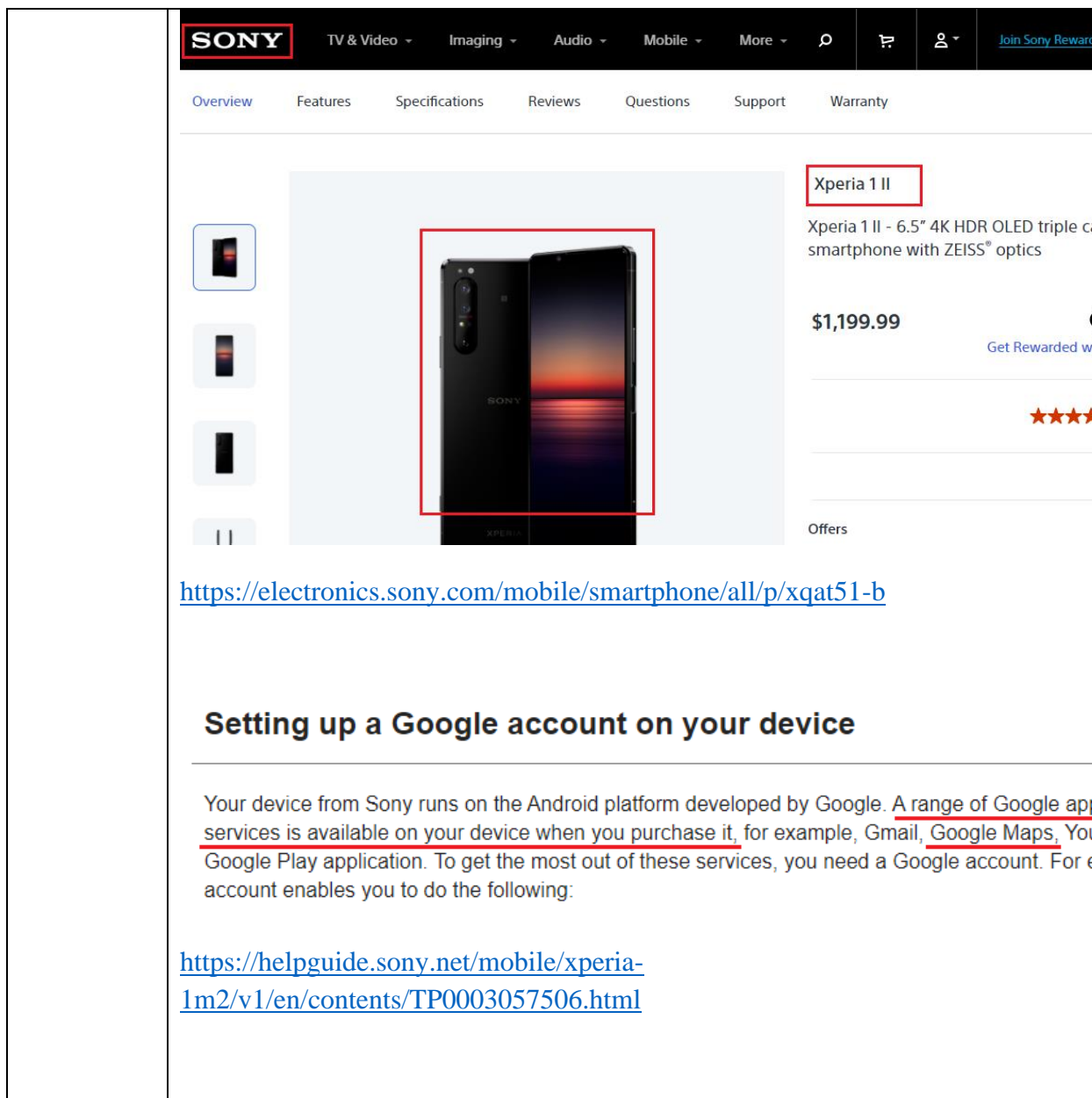
15. The '777 patent provide an apparatus and associated systems and methods for improving a user's experience.

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[1] Plaintiff reserves the right to amend if discovery reveals an earlier date of knowledge.
[2] Plaintiff reserves the right to amend if discovery reveals an earlier date of knowledge.

16. Sony designs, manufactures, markets and sells systems and processes for providing user feedback from a device, that infringe one or more claims of the '777 patent, including one or more of claims 1-10, literally or under the doctrine of equivalents. Defendant put the inventions claimed by the '777 Patent into service (i.e., used them); but for Defendant's actions, the claimed-inventions embodiments involving Defendant's products and services would never have been put into service. Defendant's acts complained of herein caused those claimed-invention embodiments as a whole to perform, and Defendant's procurement of monetary and commercial benefit from it. Support for the allegations of infringement may be found in the following preliminary table:

US9454777	Sony Xperia 1 II ("The accused product")
1. A method to use feedback in a system implemented by a computing device, comprising:	The accused product practices, at least in internal testing and usage, a method to use feedback in a system implemented by a computing device (e.g., a server of the map app of the accused product). As shown below, the accused product comes preloaded with a map app, Google Maps, for navigation and positioning. The map app included on the accused product practices a method of providing feedback from a device (e.g., the accused product).

https://electronics.sony.com/mobile/smartphone/all/p/xqat51-b

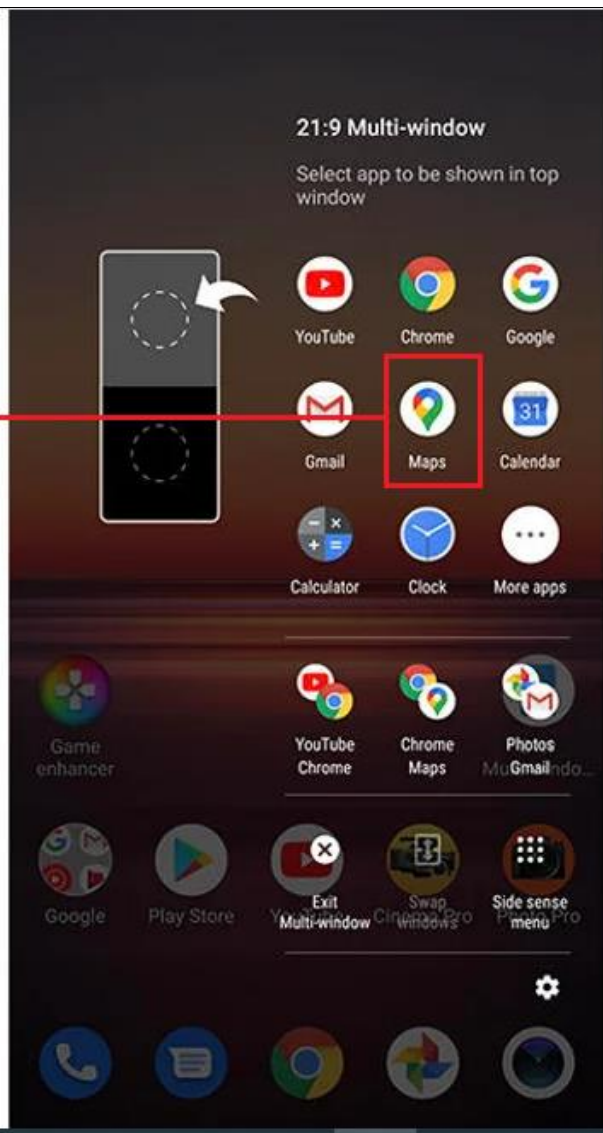https://helpguide.sony.net/mobile/xperia-1m2/v1/en/contents/TP0003057506.html

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hones sporting four or

21:9 Multi-window

Select app to be shown in top window

https://www.zdnet.com/product/sony-xperia-1-ii/

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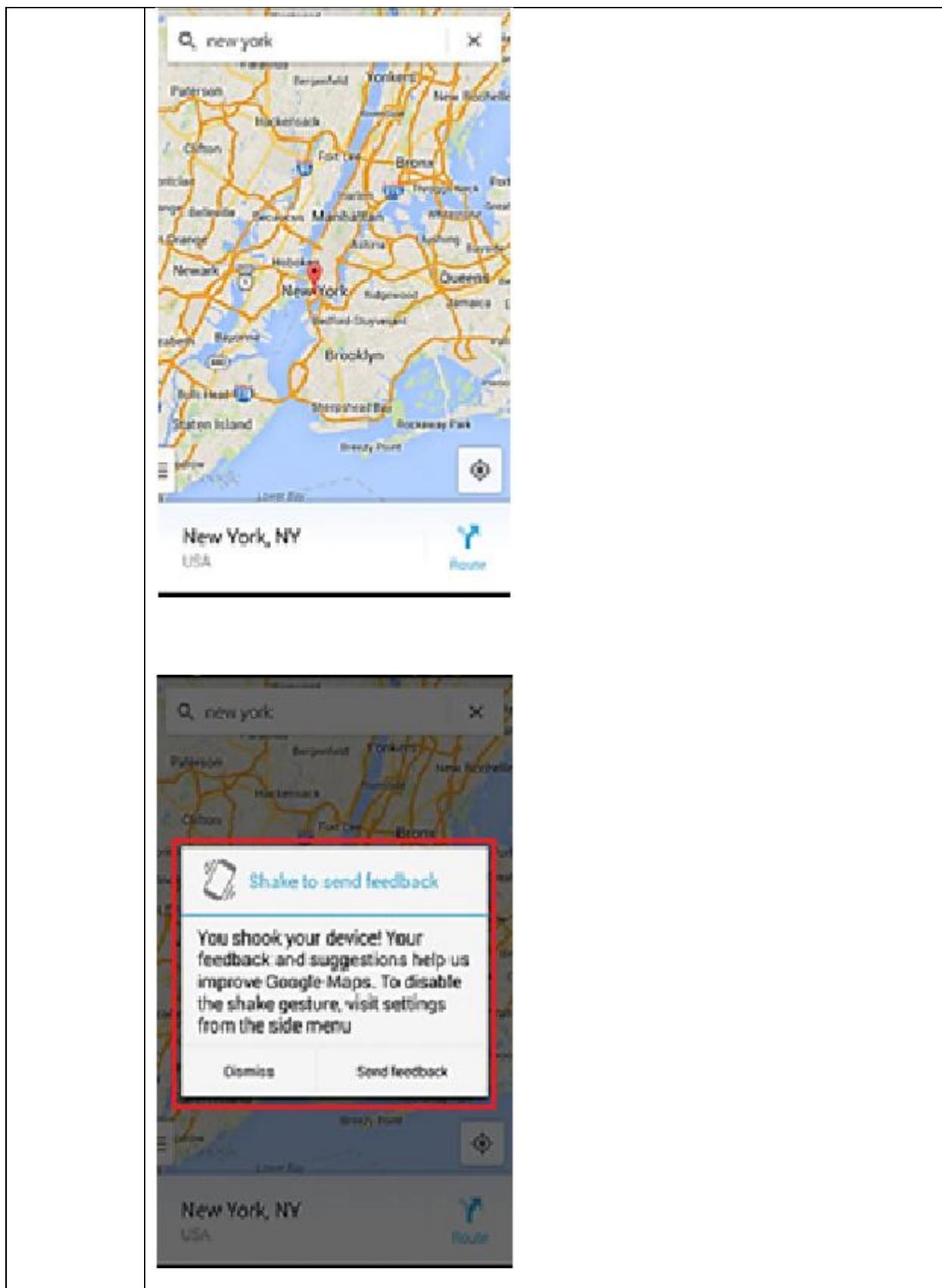
Computer   Android   iPhone & iPad

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receiving, by the computing device, a frustration event package comprising a user frustration event indicator and an associated event indicator that indicates a level and a type of user frustration associated with a user frustration event, wherein the user frustration event is associated with a device event that includes an active operation of a device at a time when the	The accused product practices, at least in internal testing and usages, receiving, by the computing device (e.g., a server of the map app of the accused product), a frustration event package (e.g., a feedback message from a user of the accused product) comprising a user frustration event indicator (e.g., an indicator which designates that the received message is a feedback message) and an associated event indicator (e.g., an indicator to show attachments such as text, image, etc. with the feedback message) that indicates a level and a type of user frustration associated with a user frustration event (e.g., shaking the accused product enabled with the map app), wherein the user frustration event (e.g., shaking the accused product enabled with the map app) is associated with a device event (e.g., selecting feedback on a pop-up message) that includes an active operation of a device (e.g., active operation of the accused product) at a time when the user frustration event (e.g., shaking the accused product enabled with the map app) occurred. As shown below, when an issue, which incites user frustration, occurred at the interface of the map app of the accused product while using it, the user can provide feedback about the issue. The map app of the accused product provides a feature, shake the device, in order to provide the feedback. The shaking action gets detected by the map app of the accused product and it generates a pop-up option to select for sending the feedback. When the user selects a feedback message to be sent, at the pop-up option, the map app of the accused product generates a feedback message package which includes information regarding the issue such as screenshots of the app to show where issue occurred, text, other addition information, etc. The user can send this message to the server of the map app of the accused product. Upon information and belief, the server of the map app of the accused product receives the frustration event package comprising a user frustration event indicator and an associated event indicator that indicates a level and a type of user frustration associated with a user frustration event (e.g., shaking the accused product enabled with the map app), wherein the user frustration event (e.g., shaking the accused product enabled with the map app) is associated with a device event (e.g., selecting feedback on a pop-up message) that includes an active operation of a device (e.g., active operation of the accused product) at a time when the user frustration event (e.g., shaking the accused product enabled with the map app) occurred.

user frustration event occurred;	## Shake Your Device to Send Feedback I can openly admit that shaking a device is my least favorite way to a almost anything ever. However, the new "shake to send feedback" fe: perfect. If you're looking for a place on your device and Google gives incorrect information or sends you down the wrong road, the first th going to do is yell and shake your phone violently. Now, when you d get a handy box prompting you to tell Google exactly what it did wro to fix it. How very accommodating. https://lifehacker.com/the-best-changes-to-the-new-google-maps-for-android-731434697 ## Send feedback about Maps To tell us about your experience using Maps, follow the steps below. 1. On your Android phone or tablet, open the Google Maps app 📍 . 2. Tap your profile picture or initial 👤 > Help & feedback. 3. Select a feedback option. ## Shake to send feedback on your phone or tablet You can shake your phone or tablet to send us feedback. This captures a screenshot of your Go to help us understand what is going on. You can remove this screenshot if it's not needed. To turn "shake to send feedback" on or off, follow the steps below. 1. Open the Google Maps app 📍 . 2. Tap your profile picture or initial 👤 > Settings ⚙ . 3. Check the box or switch on "Shake to send feedback." https://support.google.com/maps/answer/3094045?co=GENIE.Platform%3DAndroid&oco=1

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4. Hit **Preview**, then **Send**.

https://support.google.com/gmm/answer/3143996?hl=en&ref_topic=3495971

determining, by the computing device, feedback based at least in part on the user frustration event indicator and the associated	The accused product practices, at least in internal testing and usages, a method of determining, by the computing device (e.g., the server of the map app of the accused product), feedback based at least in part on the user frustration event indicator (e.g., shaking action) and the associated event indicator (e.g., problem experienced by the user, etc.).
	As shown below, when an issue, which incites user frustration, occurred at the interface of the map app of the accused product while using it, the user can provide feedback about the issue. The map app of the accused product provides a feature; shake the device, in order to provide the feedback. The shaking action gets detected by the map app of the accused product and it generates a pop-up option to select for sending the feedback. When the user selects a feedback

event indicator; and	message to be sent, at the pop-up option, the map app of the accused product generates a feedback message package which includes information regarding the issue such as screenshots of the app to show where issue occurred, text, other addition information, etc. The user can send this message to the server of the map app of the accused product. ## Shake Your Device to Send Feedback I can openly admit that shaking a device is my least favorite way to a almost anything ever. However, the new "shake to send feedback" fe: perfect. If you're looking for a place on your device and Google gives incorrect information or sends you down the wrong road, the first th going to do is yell and shake your phone violently. Now, when you do get a handy box prompting you to tell Google exactly what it did wro to fix it. How very accommodating. https://lifehacker.com/the-best-changes-to-the-new-google-maps-for-android-731434697 ## Send feedback about Maps To tell us about your experience using Maps, follow the steps below. 1. On your Android phone or tablet, open the Google Maps app 📍. 2. Tap your profile picture or initial 👤 > Help & feedback. 3. Select a feedback option. ## Shake to send feedback on your phone or tablet You can shake your phone or tablet to send us feedback. This captures a screenshot of your Go to help us understand what is going on. You can remove this screenshot if it's not needed. To turn "shake to send feedback" on or off, follow the steps below. 1. Open the Google Maps app 📍. 2. Tap your profile picture or initial 👤 > Settings ⚙. 3. Check the box or switch on "Shake to send feedback."

https://support.google.com/maps/answer/3094045?co=GENIE.Platform%3DAndroid&oco=1

Shaking action

Shake to send feedback

The fastest way is just by shaking your device while you're experiencing a problem. This a screenshot of your current Google Maps screen to give us context for your feedback. Y also have the option to remove this screenshot if it is not necessary.
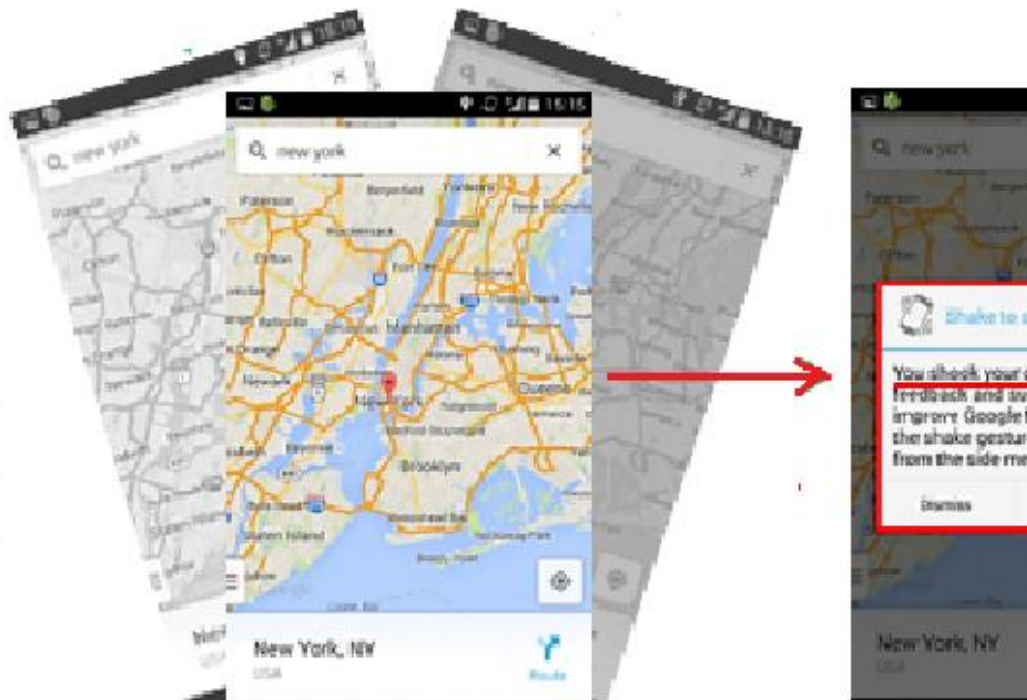
1. Shake your device, then click **Send feedback**.
2. Select **Send app feedback**.
3. Enter any information that might help in our review process. You can optionally system data, a screenshot, and/or your account information to help Google Ma address your feedback.
4. Hit **Preview**, then **Send**.

https://support.google.com/gmm/answer/3143996?hl=en&ref_topic=3495971

implementing, by the computing device, a network action based on the determined feedback.	The accused product practices, at least in internal testing and usages, a method of implementing, by the computing device (e.g., a server of the map app of the accused product), a network action (e.g., notify the respective team of the map app of the accused product regarding the feedback message) based on the determined feedback.
	As shown below, when an issue, which incites user frustration, occurred at the interface of the map app of the accused product while using it, the user can provide feedback about the issue. The map app of the accused product provides a feature, shake the device, in order to provide the feedback. The shaking action gets detected by the map app of the accused product and it generates a pop-up option to select for sending the feedback. When the user selects a feedback message to be sent, at the pop-up option, the map app of the accused product generates a feedback message package which includes information regarding the issue such as screenshots of the app to show where issue occurred, text, other addition information, etc. The user can send this message to the server of the map app of the accused product.
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17. These allegations of infringement are preliminary and are therefore subject to change. For instance, there are other of Defendant's products that infringe.

18. Sony has and continues to induce infringement. Sony has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., systems and processes for providing user feedback)

such as to cause infringement of one or more of claims 1–10 of the '777 patent, literally or under the doctrine of equivalents. Moreover, Sony has known of the '777 patent and the technology underlying it from at least the filing date of the lawsuit.[3] For clarity, direct infringement is previously alleged in this complaint.

19. Sony has and continues to contributorily infringe. Sony has actively encouraged or instructed others (e.g., its customers and/or the customers of its related companies), and continues to do so, on how to use its products and services (e.g., systems and processes for providing user feedback) such as to cause infringement of one or more of claims 1–10 of the '777 patent, literally or under the doctrine of equivalents. Further, there are no substantial noninfringing uses for Defendant's products and services. Moreover, Sony has known of the '777 patent and the technology underlying it from at least the filing date of the lawsuit.[4] For clarity, direct infringement is previously alleged in this complaint.

20. Sony has caused and will continue to cause Savannah damage by direct and indirect infringement of (including inducing infringement of) the claims of the '777 patent.

IV. JURY DEMAND

Savannah hereby requests a trial by jury on issues so triable by right.

V. PRAYER FOR RELIEF

WHEREFORE, Savannah prays for relief as follows:

a.   enter judgment that Defendant has infringed the claims of the Patents-in-Suit;

b.   award Savannah damages in an amount sufficient to compensate it for Defendant's infringement of the Patents-in-Suit in an amount no less than a reasonable royalty or lost

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[3] Plaintiff reserves the right to amend if discovery reveals an earlier date of knowledge.
[4] Plaintiff reserves the right to amend if discovery reveals an earlier date of knowledge.

profits, together with pre-judgment and post-judgment interest and costs under 35 U.S.C. § 284;

c.   award Savannah an accounting for acts of infringement not presented at trial and an award by the Court of additional damage for any such acts of infringement;

d.   declare this case to be "exceptional" under 35 U.S.C. § 285 and award Savannah its attorneys' fees, expenses, and costs incurred in this action;

e.   declare Defendant's infringement to be willful and treble the damages, including attorneys' fees, expenses, and costs incurred in this action and an increase in the damage award pursuant to 35 U.S.C. § 284;

f.   a decree addressing future infringement that either (i) awards a permanent injunction enjoining Defendant and its agents, servants, employees, affiliates, divisions, and subsidiaries, and those in association with Defendant from infringing the claims of the Patents-in-Suit, or (ii) awards damages for future infringement in lieu of an injunction in an amount consistent with the fact that for future infringement the Defendant will be an adjudicated infringer of a valid patent, and trebles that amount in view of the fact that the future infringement will be willful as a matter of law; and

g.   award Savannah such other and further relief as this Court deems just and proper.

DATED: January 31, 2022   Respectfully submitted,

                                    Chong Law Firm PA

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