

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Charles K. Verhoeven (Bar No. 170151)  
charlesverhoeven@quinnemanuel.com

3 50 California Street, 22nd Floor  
San Francisco, California 94111

4 Telephone: (415) 875-6600

5 David A. Nelson (*pro hac vice* application forthcoming)  
davenelson@quinnemanuel.com

6 191 N. Wacker Dr., Suite 2700  
Chicago, IL 60606

7 Telephone: (312) 705-7400

8 Patrick D. Curran (Bar No. 241630)  
patrickcurran@quinnemanuel.com

9 Quinn Emanuel Urquhart & Sullivan, LLP  
111 Huntington Ave, Suite 520

10 Boston, MA 02199

11 Telephone: (617) 712-7100

12 S. Alex Lasher (*pro hac vice* application forthcoming)  
alexlasher@quinnemanuel.com

13 Jeffrey Gerchick (*pro hac vice* application forthcoming)  
jeffgerchick@quinnemanuel.com

14 Nina S. Tallon (*pro hac vice* application forthcoming)  
ninatallon@quinnemanuel.com

15 1300 I Street, NW, Suite 900  
Washington, D.C. 20005

16 Telephone: (202) 538-8000

17 Attorneys for GOOGLE LLC

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 GOOGLE LLC,

21 Plaintiff,

22 vs.

23 SONOS, INC.,

24 Defendant.

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

25

26

27

28

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 1. Plaintiff Google LLC (“Google”), by and through its attorneys, and for its  
3 Complaint against Sonos, Inc. (“Sonos”), hereby alleges the following:

4 **NATURE OF THE ACTION**

5 2. Google brings this action against Sonos for infringement of U.S. Patent No.  
6 10,593,330 (“the ’330 patent”), U.S. Patent No. 10,134,398 (“the ’398 patent”), and U.S. Patent  
7 No. 7,705,565 (“the ’565 patent”) (collectively, the “Asserted Patents”).

8 **BACKGROUND**

9 3. Google was founded in 1998, and has a mission to organize the world’s  
10 information and make it universally accessible and useful. Over the past two decades, in service of  
11 that mission, Google has become one of the world’s most innovative technology companies.  
12 Google’s revolutionary advances in search, computing, software, hardware, and voice-assisted  
13 technologies have resulted in improved services for millions of people worldwide.

14 4. As part of its commitment to innovation, Google has invested significantly in  
15 extensive research and development efforts. Google is the current assignee of tens of thousands of  
16 patents worldwide.

17 5. Google has pioneered advances at the heart of modern technology. Google’s  
18 innovative voice-activated Google Assistant has transformed smart device management, connected  
19 homes, and mobile computing, and Google’s innovations in power management for voice-  
20 controlled devices have made speech interfaces an efficient and effective component of modern  
21 electronics. Google’s innovations in power management, including advances for speech-detecting  
22 devices and techniques for more efficient wireless charging, are key components for modern  
23 mobile devices and smart-home technologies.

24 6. Google makes its innovative technology available to users worldwide, and also to  
25 other companies – even providing its Google Assistant software to Sonos for many years. Google  
26 engineers have worked for years assisting and instructing Sonos engineers regarding  
27 implementation of voice recognition and voice-activated device controls in Sonos’s products.  
28

1 This software and know-how, which Google provided to Sonos in the spirit of partnership and  
2 collaboration, helped drive demand for Sonos products.

3 **GOOGLE’S PARTNERSHIP WITH SONOS**

4 7. Google partners with other companies to bring Google’s innovations to millions of  
5 shared customers. In particular, Google has long had a continued partnership with Sonos. In these  
6 collaborations, Sonos has repeatedly asked Google for assistance, so that Sonos could employ  
7 Google technology to improve Sonos’s products. In 2013, Sonos asked for Google’s assistance to  
8 integrate with Google’s popular Play Music service. Google gave Sonos that assistance, and  
9 provided significant engineering resources, technical support, and other resources to integrate  
10 Sonos’s products with Google’s Play Music service in 2014.

11 8. In 2016, Sonos again asked for Google’s assistance—this time to integrate with  
12 Google’s innovative Assistant software. And again, Google was willing to help. Google gave  
13 Sonos significant assistance in designing, implementing, and testing a solution that would bring  
14 Google’s voice recognition software to Sonos’s devices. This effort again involved substantial  
15 Google engineering resources, including significant months of employee work time, for the initial  
16 launch of Google’s Assistant on Sonos’s products in May 2019.

17 9. Google is proud of its multi-year partnership with Sonos, and has worked  
18 constructively with Sonos to make the companies’ products work seamlessly by building special  
19 integrations for Sonos. For instance, when Google rolled out the ability to set a Sonos speaker as  
20 the default option for Google Assistant, it was the first time Google had done that for any partner  
21 company.

22 10. Sonos has made false claims about the companies’ shared work and Google’s  
23 technology in the lawsuits that Sonos filed against Google. While Google rarely sues other  
24 companies for patent infringement, it must assert its intellectual property rights here.

25 **SONOS’S INFRINGEMENT OF GOOGLE’S INTELLECTUAL PROPERTY**

26 11. Google has patented inventions on innovative technologies for enabling voice  
27 assistant technology and providing improvements to the efficiency, reliability, and durability of  
28 voice-controlled and battery-powered devices. Sonos is using, without permission, these Google

1 technologies in its products to enable multiple commercially-desirable features. For example,  
2 Sonos has recently introduced its Sonos Voice Control feature to control its products in a power-  
3 efficient manner through the use of “hotwords,” and to manage battery charging of its products,  
4 using technologies invented by Google. Sonos uses these technologies in a number of its  
5 products, including the Sonos Move, Sonos Roam, Sonos Roam SL, Sonos Arc, Sonos Beam, and  
6 Sonos One.

7 12. Google’s patented innovations are fundamental to the ability of Sonos’s products to  
8 work together as energy efficient, voice-controllable smart devices. Sonos acknowledges that for  
9 its products, “the real magic is in the software,” and not in the “look and sound” of its speakers.  
10 See Ex. 4, (retrieved August 3, 2022), available at  
11 [https://jobs.mindtheproduct.com/?post\\_type=job\\_listing&p=10065](https://jobs.mindtheproduct.com/?post_type=job_listing&p=10065). Sonos freely admits as much  
12 on its own tech blog:

13 Our software is the “magic.”

14 If you’ve used Sonos before, you know that the Sonos  
15 experience is more than just sounds coming from a speaker. It’s the  
16 seamlessness of moving from room to room while listening to your  
17 favorite true crime podcast. It’s the ease of asking your voice assistant  
18 to turn down the volume or convert ounces to cups while you’re  
19 cooking. And it’s the joy of soundtracking a picnic with a  
20 collaborative playlist on a speaker that weighs less than a pound.

19 None of this would be possible without the hard-working  
20 software inside our speakers and components. “There’s a perception  
21 that we’re a hardware company because everything we sell is  
22 hardware,” says Jim Dolan, Vice President, Software Development.  
23 “And the hardware is beautiful. It’s amazing. But *the magic of the*  
24 *system is the software*. The speaker itself does not enable the system;  
25 the software enables the system.”

23 See Ex. 5, “5 Things We Want To Share With Our Future SVP, Software” (retrieved June  
24 20, 2022), available at [https://tech-blog.sonos.com/posts/things-we-want-to-share-with-our-future-](https://tech-blog.sonos.com/posts/things-we-want-to-share-with-our-future-svp-software/)  
25 [svp-software/](https://tech-blog.sonos.com/posts/things-we-want-to-share-with-our-future-svp-software/) (emphasis added). This software “magic” uses patented Google technology, and  
26 Google brings this case to defend that technology from Sonos’s infringement.



**FIRST CAUSE OF ACTION**

**(Infringement of U.S. Patent No. 10,593,330)**

1  
2  
3 20. Google incorporates and realleges all of the above paragraphs as though fully set  
4 forth herein.

5 21. U.S. Patent No. 10,593,330, titled “Hotword Detection On Multiple Devices,” was  
6 duly and lawfully issued by the United States Patent and Trademark Office on October 26, 2018  
7 and is assigned to Google LLC. A true and correct copy of the ’330 patent is attached to this  
8 Complaint as Exhibit 1.

9 22. Google is the owner of all rights, title, and interest in the ’330 patent, including the  
10 right to bring this suit for past and future damages and/or injunctive relief.

11 23. The ’330 patent is valid and enforceable.

12 24. Sonos infringes one or more claims of the ’330 patent, including but not limited to  
13 claims 1-7, 9-15, 17, and 18 (the “Asserted ’330 Claims”), directly and/or indirectly via induced  
14 infringement and/or by contributory infringement. Sonos infringes the Asserted ’330 Claims by  
15 making, using, offering to sell, importing, selling for importation, and/or selling after importation  
16 into the United States at least Sonos audio player products that include one or more microphones  
17 and support Sonos Voice Control, including the Sonos One, Sonos Move, Sonos Roam, Sonos  
18 Arc, and Sonos Beam (the “Accused Voice Products”) in violation of 35 U.S.C. Sections 271(a)-  
19 (c). On information and belief, the Accused Voice Products satisfy all claim limitations of the  
20 Asserted ’330 Claims at the time of their importation into and/or sale in the United States.

21 25. Sonos had knowledge of the ’330 patent by no later than the filing of this action.

22 26. Sonos directly infringes the Asserted ’330 Claims by making, using, offering to  
23 sell, or selling the Accused Voice Products in the United States and by importing the Accused  
24 Voice Products into the United States in violation of 35 U.S.C. Section 271(a). A claim chart  
25 illustrating Sonos’s infringement of independent claims 1, 9, and 17 of the ’330 patent for a  
26 representative Accused Voice Product is attached as Exhibit 7.

27 27. Sonos actively, knowingly, and intentionally induces the infringement of the  
28 Asserted ’330 Claims by actively encouraging others to make, use, offer to sell, or sell the

1 Accused Voice Products in the United States and/or import the Accused Voice Products into the  
2 United States in violation of 35 U.S.C. Section 271(b). By at least the filing of this Complaint,  
3 Sonos knows (or should know) that its actions will induce (and do induce) users of the Accused  
4 Voice Products to directly infringe the Asserted '330 Claims. For example, Sonos promotes  
5 Sonos Voice Control as providing “[f]ast, accurate control of your music and your Sonos System,”  
6 and as being available “on new voice capable products and as a free update for existing  
7 customers.” Ex. 14 (retrieved August 3, 2022) available at [https://www.sonos.com/en-](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening)  
8 [us/newsroom/introducing-effortless-listening](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening).

9         28. Sonos contributorily infringes the Asserted '330 Claims by offering to sell or  
10 selling within the United States or importing into the United States the Accused Voice Products  
11 (where each of the Accused Voice Products is or contains a component of a patented machine,  
12 manufacture, combination or composition, or a material or apparatus for use in practicing a  
13 patented process, constituting a material part of the invention), knowing, by at least the filing of  
14 this Complaint, the same to be especially made or especially adapted for use in infringing the '330  
15 patent, and not a staple article or commodity of commerce suitable for substantial non-infringing  
16 use in violation of 35 U.S.C. Section 271(c).

17         29. Sonos’s continued infringement of the '330 patent is willful and deliberate because  
18 it knows of the '330 patent and the infringement of that patent no later than the filing of this  
19 action, but continues to act despite an objectively high likelihood that such acts will result in  
20 infringement of the patent.

21         30. As the direct and proximate result of Sonos’s conduct, Google has suffered and, if  
22 Sonos’s conduct is not stopped, will continue to suffer, competitive harm, irreparable injury, and  
23 damages in an amount to be proven at trial. Because Google’s remedy at law is inadequate,  
24 Google seeks, in addition to damages, permanent injunctive relief. Google’s business operates in  
25 a competitive market and will continue suffering irreparable harm absent injunctive relief.

26  
27  
28

**SECOND CAUSE OF ACTION**

**(Infringement of U.S. Patent No. 10,134,398)**

1  
2  
3 31. Google incorporates and realleges all of the above paragraphs as though fully set  
4 forth herein.

5 32. U.S. Patent No. 10,134,398, titled “Hotword Detection On Multiple Devices,” was  
6 duly and lawfully issued by the United States Patent and Trademark Office on November 20,  
7 2018, and is assigned to Google LLC. A true and correct copy of the ’398 patent is attached to  
8 this Complaint as Exhibit 2.

9 33. Google is the owner of all rights, title, and interest in the ’398 patent, including the  
10 right to bring this suit for past and future damages and/or injunctive relief.

11 34. The ’398 patent is valid and enforceable.

12 35. Sonos infringes one or more claims of the ’398 patent, including but not limited to  
13 claims 1-5, 7-13, and 15-20 (the “Asserted ’398 Claims”), directly and/or indirectly via induced  
14 infringement and/or by contributory infringement. Sonos infringes the Asserted ’398 Claims by  
15 making, using, offering to sell, importing, selling for importation, and/or selling after importation  
16 into the United States at least the Accused Voice Products in violation of 35 U.S.C. Sections  
17 271(a)-(c). On information and belief, the Accused Voice Products satisfy all claim limitations of  
18 the Asserted ’398 Claims at the time of their use in the United States. A claim chart illustrating  
19 Sonos’s infringement of independent claims 1, 9, and 16 of the ’398 patent for a representative  
20 Accused Voice Product is attached as Exhibit 15.

21 36. Sonos had knowledge of the ’398 patent by no later than the filing of this action.

22 37. Sonos directly infringes the Asserted ’398 Claims by making, using, offering to  
23 sell, or selling the Accused Voice Products in the United States in violation of 35 U.S.C. Section  
24 271(a).

25 38. Sonos actively, knowingly, and intentionally induces the infringement of the  
26 Asserted ’398 Claims by actively encouraging others to make, use, offer to sell, or sell the  
27 Accused Voice Products in the United States and/or import the Accused Voice Products into the  
28 United States in violation of 35 U.S.C. Section 271(b). By at least the filing of this Complaint,



1 Sonos knows (or should know) that its actions will induce (and do induce) users of the Accused  
2 Voice Products to directly infringe the Asserted '398 Claims. For example, Sonos promotes  
3 Sonos Voice Control as providing “[f]ast, accurate control of your music and your Sonos System,”  
4 and as being available “on new voice capable products and as a free update for existing  
5 customers.” Ex. 17 (retrieved August 3, 2022) available at [https://www.sonos.com/en-](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening)  
6 [us/newsroom/introducing-effortless-listening](https://www.sonos.com/en-us/newsroom/introducing-effortless-listening).

7 39. Sonos contributorily infringes the Asserted '398 Claims by offering to sell or  
8 selling within the United States or importing into the United States the Accused Voice Products  
9 (where each of the Accused Voice Products is or contains a component of a patented machine,  
10 manufacture, combination or composition, or a material or apparatus for use in practicing a  
11 patented process, constituting a material part of the invention), knowing, by at least the filing of  
12 this Complaint, the same to be especially made or especially adapted for use in infringing the '398  
13 patent, and not a staple article or commodity of commerce suitable for substantial non-infringing  
14 use in violation of 35 U.S.C. Section 271(c).

15 40. Sonos's continued infringement of the '398 patent is willful and deliberate because  
16 it knows of the '398 patent and the infringement of that patent no later than the filing of this  
17 action, but continues to act despite an objectively high likelihood that such acts will result in  
18 infringement of the patent.

19 41. As the direct and proximate result of Sonos's conduct, Google has suffered and, if  
20 Sonos's conduct is not stopped, will continue to suffer, competitive harm, irreparable injury, and  
21 damages in an amount to be proven at trial. Because Google's remedy at law is inadequate,  
22 Google seeks, in addition to damages, permanent injunctive relief. Google's business operates in  
23 a competitive market and will continue suffering irreparable harm absent injunctive relief.

24 **THIRD CAUSE OF ACTION**

25 **(Infringement of U.S. Patent No. 7,705,565)**

26 42. Google incorporates and realleges all of the above paragraphs as though fully set  
27 forth herein.

28

1 43. U.S. Patent No. 7,705,565, titled “Method and System for Wireless Charging,” was  
2 duly and lawfully issued by the United States Patent and Trademark Office on April 27, 2010, and  
3 is assigned to Google LLC. A true and correct copy of the ’565 patent is attached to this  
4 Complaint as Exhibit 3.

5 44. Google is the owner by assignment of all rights, title, and interest in the ’565  
6 patent, including the right to bring this suit for past and future damages and/or injunctive relief.

7 45. The ’565 patent is valid and enforceable.

8 46. Sonos infringes one or more claims of the ’565 patent, including but not limited to  
9 claims 1, 3-7, 9-15, and 18 (the “Asserted ’565 Claims”), directly and/or indirectly via induced  
10 infringement and/or by contributory infringement. Sonos infringes the Asserted ’565 Claims by  
11 making, using, offering to sell, importing, selling for importation, and/or selling after importation  
12 into the United States at least Sonos audio player products that support both wireless and wired  
13 charging, including the Sonos Move, Sonos Roam, and Sonos Roam SL (the “Accused Portable  
14 Products”) in violation of 35 U.S.C. Sections 271(a)-(c). On information and belief, the Accused  
15 Portable Products satisfy all claim limitations of the Asserted ’565 Claims at the time of their  
16 importation into and/or sale in the United States.

17 47. Sonos had knowledge of the ’565 patent by no later than the filing of this action.

18 48. Sonos directly infringes the Asserted ’565 Claims by making, using, offering to  
19 sell, or selling the Accused Portable Products in the United States and by importing the Accused  
20 Portable Products into the United States in violation of 35 U.S.C. Section 271(a). A claim chart  
21 illustrating Sonos’s infringement of independent claims 1, 9, and 18 of the ’565 patent for a  
22 representative Accused Portable Product is attached as Exhibit 16.

23 49. Sonos actively, knowingly, and intentionally induces the infringement of the  
24 Asserted ’565 Claims by actively encouraging others to make, use, offer to sell, or sell the  
25 Accused Portable Products in the United States and/or import the Accused Portable Products into  
26 the United States in violation of 35 U.S.C. Section 271(b). By at least the filing of this Complaint,  
27 Sonos knows (or should know) that its actions will induce (and do induce) users of the Accused  
28 Portable Products to directly infringe the Asserted ’565 Claims. For example, Sonos provides

1 instructions informing a user “how to charge your Sonos Roam or Roam SL with a USB-C cable  
2 (included), wireless Qi charger, or the Sonos Wireless Charger.” Ex. 22 (retrieved August 3,  
3 2022), available at <https://support.sonos.com/s/article/4994>. Sonos advertises to users that they  
4 can charge their Sonos Roam “[u]sing the included USB A-C charging cable with any 5V/1.5A  
5 (7.5W) or higher USB power adapter. You can also use the [Sonos Roam Wireless Charger](#) or any  
6 Qi-certified wireless charger.” Ex. 17 (retrieved August 5, 2022), available at  
7 <https://www.sonos.com/en-us/shop/roam>. Sonos likewise promotes the Sonos Move as capable  
8 of being charged in a wired or wireless configuration. *See* Ex. 23 (retrieved August 5, 2022),  
9 available at <https://www.sonos.com/en-us/guides/move> (“Rechargeable battery lasts up to 10  
10 hours. Easily recharge by just setting Move on the charging base—no plugs or extra wires  
11 required. For power on the go, use a compatible USB-C charger (sold separately).”).

12         50. Sonos contributorily infringes the Asserted ’565 Claims by offering to sell or  
13 selling within the United States or importing into the United States the Accused Portable Products  
14 (where each of the Accused Portable Products is or contains a component of a patented machine,  
15 manufacture, combination or composition, or a material or apparatus for use in practicing a  
16 patented process, constituting a material part of the invention), knowing, by at least the filing of  
17 this Complaint, the same to be especially made or especially adapted for use in infringing the ’565  
18 patent, and not a staple article or commodity of commerce suitable for substantial non-infringing  
19 use in violation of 35 U.S.C. Section 271(c).

20         51. Sonos’s continued infringement of the ’565 patent is willful and deliberate because  
21 it knows of the ’565 patent and the infringement of that patent no later than the filing of this  
22 action, but continues to act despite an objectively high likelihood that such acts will result in  
23 infringement of the patent.

24         52. As the direct and proximate result of Sonos’s conduct, Google has suffered and, if  
25 Sonos’s conduct is not stopped, will continue to suffer, competitive harm, irreparable injury, and  
26 damages in an amount to be proven at trial. Because Google’s remedy at law is inadequate,  
27 Google seeks, in addition to damages, permanent injunctive relief. Google’s business operates in  
28 a competitive market and will continue suffering irreparable harm absent injunctive relief.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Google respectfully demands a trial by jury on all issues triable by jury.

DATED: August 8, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By                   /s/ Patrick D. Curran                    
Patrick D. Curran  
Attorneys for GOOGLE LLC