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15 **IN THE UNITED STATES DISTRICT COURT**  
16 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

18 SONOS, INC.,  
19 *Plaintiff-Counterclaim Defendant,*  
20 vs.  
21 GOOGLE LLC,  
22 *Defendant-Counterclaimant.*

CASE NO. 2:20-cv-00169-JAK  
(DFMx)

**GOOGLE’S FIRST AMENDED  
ANSWER AND  
COUNTERCLAIMS TO SONOS’  
SECOND AMENDED  
COMPLAINT**

**JURY TRIAL DEMANDED**

Judge: Hon. John A. Kronstadt

Complaint Filed: Jan. 7, 2020

1 Defendant Google LLC (“Google”) submits this First Amended Answer and  
2 Counterclaims to Plaintiff Sonos, Inc.’s (“Sonos”) Second Amended Complaint for  
3 Patent Infringement (“SAC”), and states as follows:

4 **RESPONSES TO SPECIFIC ALLEGATIONS OF THE SECOND AMENDED**  
5 **COMPLAINT**

6 1. Google admits that Sonos, Inc. asserts United States Patent Nos.  
7 7,571,014, 8,588,949, 9,195,258, 9,219,959, 10,031,715, 10,209,953, 10,439,896,  
8 10,541,833, 10,966,025, and 11,080,001 against Google. Google admits that Exhibits  
9 1-5, 108-110, and 130-131 purport to be those asserted patents. Google is currently  
10 without knowledge or information sufficient to form a belief as to the truth or falsity  
11 of the remaining allegations in Paragraph 1 of the SAC, and therefore denies them.

12 **INTRODUCTION**

13 2. Google is currently without knowledge or information sufficient to form  
14 a belief as to the truth or falsity of the allegations and characterizations contained in  
15 Paragraph 2 of the SAC and, on that basis, denies them.

16 3. Google denies that it has copied Sonos’s products or technology. Google  
17 is currently without knowledge or information sufficient to form a belief as to the  
18 truth or falsity of the remaining allegations and characterizations contained in  
19 Paragraph 3 of the SAC and, on that basis, denies them.

20 4. Google is currently without knowledge or information sufficient to form  
21 a belief as to the truth or falsity of the allegations and characterizations contained in  
22 Paragraph 4 of the SAC and, on that basis, denies them.

23 5. Google is currently without knowledge or information sufficient to form  
24 a belief as to the truth or falsity of the allegations that, as early as 2011, Google  
25 engineers and employees were familiar with Sonos and its products and recognized  
26 Sonos’s commercial success and, on that basis, denies them. Google also denies the  
27 remaining allegations and characterizations contained in Paragraph 5 of the SAC.

28 6. Google denies the allegations of Paragraph 6 of the SAC.

1 7. Google denies the allegations of Paragraph 7 of the SAC.

2 8. Google denies the allegations of Paragraph 8 of the SAC.

3 9. Google is without knowledge or information sufficient to form a belief  
4 as to the truth or falsity of the reasons why Sonos brought this lawsuit. Google  
5 specifically denies that it has infringed, willful or not, any of Sonos's patent rights.  
6 Google denies the remaining allegations of Paragraph 9 of the SAC.

7 **SONOS'S ALLEGED INNOVATION**

8 10. Google admits that Exhibits 6 and 7 purport to be articles from *NBC*  
9 *News* and *Men's Journal*, respectively. Google is currently without knowledge or  
10 information sufficient to form a belief as to the truth or falsity of the remaining  
11 allegations and characterizations contained in Paragraph 10 of the SAC, and therefore  
12 denies them.

13 11. Google admits that Exhibit 8 purports to be an article from *PC Magazine*.  
14 Google is currently without knowledge or information sufficient to form a belief as to  
15 the truth or falsity of the remaining allegations and characterizations contained in  
16 Paragraph 11 of the SAC, and therefore denies them.

17 12. Google is currently without knowledge or information sufficient to form  
18 a belief as to the truth or falsity of the allegations and characterizations in Paragraph  
19 12 of the SAC and, on that basis, denies them.

20 13. Google admits that Exhibit 9 purports to be a Sonos user guide. Google  
21 is currently without knowledge or information sufficient to form a belief as to the  
22 truth or falsity of the remaining allegations and characterizations in Paragraph 13 of  
23 the SAC and, on that basis, denies them.

24 14. Google is currently without knowledge or information sufficient to form  
25 a belief as to the truth or falsity of the allegations and characterizations in Paragraph  
26 14 of the SAC and, on that basis, denies them.

27 15. Google admits that Exhibits 10 and 11 purport to be news articles from  
28 *Digital Trends* and *What Hi-Fi*. Google is currently without knowledge or

1 information sufficient to form a belief as to the truth or falsity of the remaining  
2 allegations and characterizations in Paragraph 15 of the SAC and, on that basis, denies  
3 them.

4 16. Google admits that Exhibit 12 purports to a printed copy of a Sonos  
5 webpage. Google admits that Exhibit 13 purports to be a news article from *Wired*.  
6 Google is currently without knowledge or information sufficient to form a belief as to  
7 the truth or falsity of the remaining allegations and characterizations in Paragraph 16  
8 of the SAC and, on that basis, denies them.

9 17. Google admits that Exhibits 14 and 15 purport to be articles from IPO  
10 and IEEE. Google is currently without knowledge or information sufficient to form  
11 a belief as to the truth or falsity of the remaining allegations and characterizations in  
12 Paragraph 17 of the SAC and, on that basis, denies them.

13 18. Google admits that Exhibits 16 and 18 purport to be a printed copy of  
14 Sonos’s webpage. Google admits that Exhibit 9 purports to be a Sonos user guide.  
15 Google admits that Exhibit 17 purports to be a Sonos product information sheet.  
16 Google is currently without knowledge or information sufficient to form a belief as to  
17 the truth or falsity of the remaining allegations and characterizations in Paragraph 18  
18 of the SAC and, on that basis, denies them.

19 **GOOGLE DOES NOT INFRINGE**

20 19. Google admits that Google had a product called “Chromecast Audio,”  
21 and admits that Exhibit 19 purports to be a September 2015 news article from The  
22 Guardian. Except as specifically admitted, Google denies the allegations and  
23 characterizations contained in Paragraph 19 of the SAC.

24 20. Google admits that Exhibit 20 purports to be a December 2015 posting  
25 from a webpage entitled “Chrome Blog.” Except as specifically admitted, Google  
26 denies the allegations and characterizations contained in Paragraph 20 of the SAC.

27 21. Google admits that Exhibit 21 purports to be a copy of a December 2015  
28 Variety article entitled “Google’s Chromecast Audio Adapter Gets Multi-Room

1 Support Similar to Sonos.” Except as specifically admitted, Google denies the  
2 allegations and characterizations contained in Paragraph 21 of the SAC.

3 22. Google admits that Exhibit 22 purports to be a copy of a December 2015  
4 article from Pocket-Lint. Except as specifically admitted, Google denies the  
5 allegations and characterizations contained in Paragraph 22 of the SAC.

6 23. Google denies the allegations and characterizations contained in  
7 Paragraph 23 of the SAC.

8 24. Google denies the allegations and characterizations contained in  
9 Paragraph 24 of the SAC.

10 25. Google denies the allegations and characterizations contained in  
11 Paragraph 25 of the SAC.

12 26. Google admits that Google launched a Chromecast Audio wireless  
13 adapter in 2015, and that in 2016 Google launched the Google Home smart speaker.  
14 Google denies the remaining allegations and characterizations contained in Paragraph  
15 26 of the SAC.

16 27. Google admits that Exhibit 23 purports to be a copy of an October 2016  
17 article from *The Register*. Except as specifically admitted, Google denies the  
18 allegations and characterizations contained in Paragraph 27 of the SAC.

19 28. Google admits that Exhibit 24 purports to be a copy of a November 2016  
20 article from the Verge. Except as specifically admitted, Google denies the allegations  
21 and characterizations contained in Paragraph 28 of the SAC.

22 29. Google denies the allegations and characterizations contained in  
23 Paragraph 29 of the SAC.

24 30. Google admits that Exhibit 25 purports to be a copy of an October 2017  
25 article from Gizmodo, and that Exhibit 26 purports to be a copy of a December 2017  
26 article from Android Central. Google admits that in 2017 Google released the Google  
27 Home Max and the Google Home Mini. Except as specifically admitted, Google  
28 denies the allegations and characterizations contained in Paragraph 30 of the SAC.

1 31. Google denies the allegations and characterizations contained in  
2 Paragraph 31 of the SAC.

3 32. Google admits that Exhibits 27 purports to be a copy of a Google blog,  
4 and that Exhibit 28 purports to be an article from *News Without Borders*. Except as  
5 specifically admitted, Google denies the allegations and characterizations contained  
6 in Paragraph 32 of the SAC.

7 33. Google denies the allegations and characterizations contained in  
8 Paragraph 33 of the SAC.

9 34. Google admits that Exhibits 29-39 appear to be print-outs of various  
10 webpages. Except as specifically admitted, Google denies the allegations and  
11 characterizations contained in Paragraph 34 of the SAC.

12 35. Although the image contained within Paragraph 35 is grainy, Google  
13 admits that it is possible it may display several Google products and purports to  
14 display several Sonos products. Except as specifically admitted, Google denies the  
15 allegations and characterizations contained in Paragraph 35 of the Complaint.

16 36. Google admits that Exhibits 40-43 appear to be print-outs of various  
17 webpages. Except as specifically admitted, Google denies the allegations and  
18 characterizations contained in Paragraph 36 of the SAC.

19 37. Paragraph 37 does not contain any factual allegations, and therefore,  
20 does not require a response. To the extent it contains allegations requiring a response,  
21 Google denies them.

22 **THE PARTIES' PRIOR LICENSING DISCUSSIONS**

23 38. Google denies the allegations and characterizations contained in  
24 Paragraph 38 of the SAC.

25 39. Google denies the allegations and characterizations contained in  
26 Paragraph 39 of the SAC.

27 40. Google admits that Google launched a Chromecast Audio wireless  
28 adapter in 2015, and that in 2016 Google launched the Google Home smart speaker.

1 Google denies the remaining allegations and characterizations contained in Paragraph  
2 40 of the SAC.

3 41. Google denies the allegations and characterizations contained in  
4 Paragraph 41 of the SAC.

5 42. Google admits that Exhibit 114 purports to be a copy of a September 2,  
6 2016 email exchange. Except as specifically admitted, Google denies the allegations  
7 and characterizations contained in Paragraph 42 of the SAC.

8 43. Google admits that Exhibit 115 purports to be a copy of an email  
9 exchange ending on October 13, 2016. Except as specifically admitted, Google denies  
10 the allegations and characterizations contained in Paragraph 43 of the SAC.

11 44. Google admits that Exhibit 116 purports to be a copy of an October 26,  
12 2016 email exchange. Except as specifically admitted, Google denies the allegations  
13 and characterizations contained in Paragraph 44 of the SAC.

14 45. Google admits that Exhibit 117 appears to be a copy of an email  
15 exchange and a slide date with the date January 31, 2018 on the first slide. Except as  
16 specifically admitted, Google denies the allegations and characterizations contained  
17 in Paragraph 45 of the SAC.

18 46. Google admits that on July 12, 2018, Google received an email from  
19 Sonos with the subject line “Attached Sonos IP License Model.” Except as  
20 specifically admitted, Google denies the allegations and characterizations contained  
21 in Paragraph 46 of the SAC.

22 47. Google admits that on February 22, 2019, Google received an email from  
23 Sonos with the subject line “Sonos Google Meeting” that attached a letter from Sonos  
24 to Google also dated February 22, 2019. Except as specifically admitted, Google  
25 denies the allegations and characterizations contained in Paragraph 47 of the SAC.

26 48. Google admits that on June 13, 2019, Google received an email from  
27 Sonos with the subject line “Follow up from our meeting.” Except as specifically  
28

1 admitted, Google denies the allegations and characterizations contained in Paragraph  
2 48 of the SAC.

3 49. Google admits that on January 6, 2020, Google received an email from  
4 Sonos with attachments and the subject line “Notice.” Except as specifically admitted,  
5 Google denies the allegations and characterizations contained in Paragraph 49 of the  
6 SAC.

7 50. Google denies the allegations and characterizations contained in  
8 Paragraph 50 of the SAC.

9 51. Google admits that Exhibits 25 and 26 to the SAC purport to be articles  
10 from, respectively, Gizmodo and 2017 Android Central. Google is currently without  
11 knowledge or information sufficient to form a belief as to the truth or falsity of the  
12 remaining allegations and characterizations contained in Paragraph 51 of the SAC,  
13 and therefore denies them.

14 52. Google denies the allegations and characterizations contained in  
15 Paragraph 52 of the SAC.

16 **GOOGLE HAS NOT INFRINGED THE ASSERTED PATENTS**

17 53. Google admits that *In re Certain Audio Players and Controllers,*  
18 *Components Thereof, and Products Containing Same*, Inv. No. 337-TA-1191 was  
19 instituted and decided by the ITC and that the ’258, ’953, ’949, ’959, and ’896 patents  
20 were part of that investigation. Except as specifically admitted, Google denies the  
21 allegations and characterizations contained in Paragraph 53 of the SAC.

22 54. Google admits that, by agreement of the parties, the case was stayed  
23 pending the completion of the ITC investigation.

24 55. Google admits that Exhibits 118-21 purport to be copies of articles  
25 published by third parties. Except as specifically admitted, Google denies the  
26 allegations and characterizations contained in Paragraph 55 of the SAC.

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1 56. Google admits that Exhibit 23 appears to be a third party blog post.  
2 Except as specifically admitted, Google denies the allegations and characterizations  
3 contained in Paragraph 56 of the SAC.

4 57. Google admits that the ITC determined that Google’s re-designed  
5 products did not infringe any of Sonos’s patents. Except as specifically admitted,  
6 Google denies the allegations and characterizations contained in Paragraph 57 of the  
7 SAC, and specifically denies it has committed acts of infringement. To the extent  
8 Paragraph 57 of the SAC contains conclusions of law, no response is necessary.

9 58. Google denies the allegations in Paragraph 58 of the SAC insofar as they  
10 purport to attribute to the ITC investigation anything that is not stated therein. Google  
11 admits that there was an ITC investigation called *In re Certain Audio Players and*  
12 *Controllers, Components Thereof, and Products Containing Same*, Inv. No. 337-TA-  
13 1191 that involved the ’258, ’953, ’949, ’959, and ’896 patents. Google further admits  
14 that the ITC’s final determination concluded that Google’s redesigned products did  
15 not infringe any of Sonos’s patents. Except as specifically admitted or as specifically  
16 stated in the ITC investigation, Google denies the allegations and characterizations  
17 contained in Paragraph 58 of the SAC.

18 **GOOGLE HAS NOT WILLFULLY INFRINGED THE ASSERTED**  
19 **PATENTS**

20 59. Google denies the allegations and characterizations contained in  
21 Paragraph 59 of the SAC.

22 60. Google admits that Exhibit 128 purports to be a copy of an August 13,  
23 2021 letter. Except as specifically admitted, Google denies the allegations and  
24 characterizations contained in Paragraph 60 of the SAC.

25 61. Google admits that Exhibit 129 purports to be a copy of a December 4,  
26 2023 letter. Except as specifically admitted, Google denies the allegations and  
27 characterizations contained in Paragraph 61 of the SAC.  
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1           62. Google denies the allegations and characterizations contained in  
2 Paragraph 62 of the SAC.

3           63. Google denies the allegations and characterizations contained in  
4 Paragraph 63 of the SAC.

5           64. Google denies the allegations and characterizations contained in  
6 Paragraph 64 of the SAC.

7           65. Google denies the allegations and characterizations contained in  
8 Paragraph 65 of the SAC.

9           66. Google denies the allegations and characterizations contained in  
10 Paragraph 66 of the SAC.

11           67. Google denies the allegations and characterizations contained in  
12 Paragraph 67 of the SAC.

13           68. Google denies the allegations and characterizations contained in  
14 Paragraph 68 of the SAC.

15           69. Google denies the allegations and characterizations contained in  
16 Paragraph 69 of the SAC.

17           70. Google admits that Exhibit 47 purports to be a copy of a docket report  
18 for *Sonos Inc. v. D&M Holdings Inc. et al*, 1:14-cv-01330-WCB (D. Del.). Google  
19 admits that Sonos provided a pre-filing copy of the Complaint one day before it was  
20 filed, that Exhibit 48 purports to an article from *Venture Beat*, that Exhibit 49 purports  
21 to be an article from *CNET*, and that Exhibit 50 purports to be a copy of a jury form  
22 from *Sonos Inc. v. D&M Holdings Inc. et al.*, 1:14-cv-01330-WCB (D. Del.). Except  
23 as specifically admitted, Google denies the allegations and characterizations  
24 contained in Paragraph 70 of the SAC.

25           71. Google denies the allegations and characterizations contained in  
26 Paragraph 71 of the SAC.

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1 **GOOGLE HAS NOT BEEN UNJUST ENRICHED**

2 72. Google admits that Exhibit 44 purports to be a copy of a report from the  
3 Royal Bank of Canada. Except as specifically admitted, Google denies the allegations  
4 and characterizations contained in Paragraph 72 of the SAC.

5 73. Google admits that Exhibit 44 purports to be a copy of a report from the  
6 Royal Bank of Canada and that the cited webpage purports to be a page from Forbes’s  
7 website. Except as specifically admitted, Google denies the allegations and  
8 characterizations contained in Paragraph 73 of the SAC.

9 74. Google admits that Exhibit 45 and 28 purport to be articles from the *New*  
10 *York Post* and *News Without Borders*, respectively. Except as specifically admitted,  
11 Google denies the allegations and characterizations contained in Paragraph 74 of the  
12 SAC.

13 75. Google admits that Exhibit 46 purports to be a copy of an NPR report.  
14 Google admits that Exhibit 28 purports to be an article from *News Without Borders*.  
15 Except as specifically admitted, Google denies the allegations and characterizations  
16 contained in Paragraph 75 of the SAC.

17 76. Google denies the allegations and characterizations contained in  
18 Paragraph 76 of the SAC.

19 **THE PARTIES**

20 77. Google currently lacks knowledge or information sufficient to form a  
21 belief as to the truth or falsity of the allegations and characterizations in Paragraph 77  
22 of the SAC and, on that basis, denies them.

23 78. Google admits that Google LLC is a Delaware limited liability company  
24 with its principal place of business and headquarters at 1600 Amphitheatre Parkway,  
25 Mountain View, CA 94043. Google admits that there is a Google office at 340 Main  
26 St., Venice, CA 90291 and a YouTube office at 12422 W. Bluff Creek, Playa Vista,  
27 CA 90094. Google is currently without knowledge or information sufficient to form  
28

1 a belief as to the truth or falsity of the remaining allegations and characterizations in  
2 Paragraph 78 of the SAC and, on that basis, denies them.

3 79. Google admits that it is a technology company and conducts business  
4 operations in this District. Google is currently without knowledge or information  
5 sufficient to form a belief as to the truth or falsity of the remaining allegations and  
6 characterizations in Paragraph 79 of the SAC and, on that basis, denies them.

7 80. Google denies the allegations and characterizations contained in  
8 Paragraph 80 of the SAC.

9 **JURISDICTION AND VENUE**

10 81. Google admits that this Court has subject matter jurisdiction under 28  
11 U.S.C. §§ 1331 and 1338(a) and that this action purports to arise under the Patent Act,  
12 35 U.S.C. § 1 *et seq.*

13 82. For purposes of this action only, Google does not challenge personal  
14 jurisdiction. Except as expressly admitted, Google denies the remaining allegations  
15 of Paragraph 82 of the SAC, and specifically denies that it has committed acts of  
16 infringement.

17 83. For purposes of this action only, Google does not challenge personal  
18 jurisdiction. Except as expressly admitted, Google denies the allegations and  
19 characterizations contained in Paragraph 83 of the SAC.

20 84. For purposes of this action only, Google admits that venue is proper in  
21 this District. Except as expressly admitted, Google denies the remaining allegations  
22 of Paragraph 84 of the SAC, and specifically denies that it has committed acts of  
23 infringement.

24 **PATENT-IN-SUIT**

25 **Background**

26 85. Google denies the allegations in Paragraph 85 of the SAC insofar as they  
27 purport to attribute to the '949 and '959 patents anything that is not stated therein.  
28 Google admits that early technology for multi-zone audio systems sometimes utilized

1 upon hard-wiring with dedicated speaker wires to different audio players in different  
2 rooms. Google is currently without knowledge or information sufficient to form a  
3 belief as to the truth or falsity of the remaining allegations and characterizations  
4 contained in Paragraph 85 of the SAC, and therefore denies them.

5 86. Google denies the allegations in Paragraph 86 of the SAC insofar as they  
6 purport to attribute to the '949 patent anything that is not stated therein. Google admits  
7 that early technology for multi-zone audio systems sometimes utilized upon hard-  
8 wiring with dedicated speaker wires to different audio players in different rooms.  
9 Google is currently without knowledge or information sufficient to form a belief as to  
10 the truth or falsity of the remaining allegations and characterizations contained in this  
11 Paragraph of the SAC, and therefore denies them.

12 87. Google denies the allegations in Paragraph 87 of the Complaint insofar  
13 as they purport to attribute to the '949 and '959 patents anything that is not stated  
14 therein. Google admits that early technology for multi-zone audio systems sometimes  
15 utilized upon hard-wiring with dedicated speaker wires to different audio players in  
16 different rooms. Google is currently without knowledge or information sufficient to  
17 form a belief as to the truth or falsity of the remaining allegations and  
18 characterizations contained in this Paragraph of the SAC, and therefore denies them.

19 88. Google is currently without knowledge or information sufficient to form  
20 a belief as to the truth or falsity of the remaining allegations and characterizations  
21 contained in Paragraph 88 of the SAC, and therefore denies them.

22 89. Google denies the allegations in Paragraph 89 of the SAC insofar as they  
23 purport to attribute to the '949 and '258 patents anything that is not stated therein.  
24 Google is currently without knowledge or information sufficient to form a belief as to  
25 the truth or falsity of the remaining allegations and characterizations contained in this  
26 Paragraph of the SAC, and therefore denies them.

27 90. Google denies the allegations in Paragraph 90 of the SAC insofar as they  
28 purport to attribute to the '949 and '258 patents and claims 1, 8, and 15 (as to the '949

1 patent) and claims 1, 11, and 17 (as to the '258 patent) anything that is not stated  
2 therein. Google is currently without knowledge or information sufficient to form a  
3 belief as to the truth or falsity of the remaining allegations and characterizations  
4 contained in this Paragraph of the SAC, and therefore denies them.

5 91. Google denies the allegations in Paragraph 91 of the SAC insofar as they  
6 purport to attribute to the '949, '258, and '001 patents and claims 1, 8, and 15 (as to  
7 the '949 patent), claims 1, 11, and 17 (as to the '258 patent), and claims 1, 12, and 23  
8 (as to the '001 patent) anything that is not stated therein. Google is currently without  
9 knowledge or information sufficient to form a belief as to the truth or falsity of the  
10 remaining allegations and characterizations contained in this Paragraph of the SAC,  
11 and therefore denies them.

12 92. Google denies the allegations in Paragraph 92 of the SAC insofar as they  
13 purport to attribute to the '949 and '258 patents anything that is not stated therein.  
14 Google is currently without knowledge or information sufficient to form a belief as to  
15 the truth or falsity of the remaining allegations and characterizations contained in this  
16 Paragraph of the SAC, and therefore denies them.

17 93. Google is currently without knowledge or information sufficient to form  
18 a belief as to the truth or falsity of the allegations and characterizations contained in  
19 Paragraph 93 of the SAC, and therefore denies them.

20 **U.S. Patent No. 7,571,014**

21 94. Google denies the allegations in Paragraph 94 of the SAC insofar as they  
22 purport to attribute to the '014 patent anything that is not stated therein. Google admits  
23 that the '014 patent is titled “Methods And Apparatus For Controller Multimedia  
24 Players in a Multi-Zone System”; that the '014 patent bears an issuance date of August  
25 4, 2009; that a Reexamination Certificate for the '014 patent was issued by the  
26 USPTO on September 1, 2017; and that Exhibit 108 purports to be a copy of the '014  
27 patent and Reexamination Certificate. Google is currently without knowledge or  
28 information sufficient to form a belief as to the truth or falsity of the remaining

1 allegations and characterizations contained in Paragraph 94 of the SAC, and therefore  
2 denies them.

3 95. Google denies the allegations in Paragraph 95 of the SAC insofar as they  
4 purport to attribute to the '014 patent anything that is not stated therein. Google is  
5 currently without knowledge or information sufficient to form a belief as to the truth  
6 or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 96. Google denies the allegations in Paragraph 96 of the SAC insofar as they  
9 purport to attribute to the '014 patent anything that is not stated therein. Google is  
10 currently without knowledge or information sufficient to form a belief as to the truth  
11 or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 97. Google denies the allegations in Paragraph 97 of the SAC insofar as they  
14 purport to attribute to the '014 patent anything that is not stated therein. Google is  
15 currently without knowledge or information sufficient to form a belief as to the truth  
16 or falsity of the remaining allegations and characterizations contained in this  
17 Paragraph of the SAC, and therefore denies them.

18 **The Alleged Inventions Claimed in U.S. Patent No. 7,571,014 Did Not Improve**  
19 **Technology & Were Well Understood, Routine, or Conventional**

20 98. Google denies the allegations in Paragraph 98 of the SAC insofar as they  
21 purport to attribute to the '014 patent anything that is not stated therein. Google is  
22 currently without knowledge or information sufficient to form a belief as to the truth  
23 or falsity of the remaining allegations and characterizations contained in this  
24 Paragraph of the SAC, and therefore denies them.

25 99. Google denies the allegations in Paragraph 99 of the SAC insofar as they  
26 purport to attribute to the '014 patent anything that is not stated therein. Google is  
27 currently without knowledge or information sufficient to form a belief as to the truth  
28

1 or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 100. Google admits that Exhibit 8 purports to be an article from *PC Mag*.  
4 Except as specifically admitted, Google denies the allegations in Paragraph 100 of the  
5 SAC insofar as they purport to attribute to the '014 patent anything that is not stated  
6 therein. Google is currently without knowledge or information sufficient to form a  
7 belief as to the truth or falsity of the remaining allegations and characterizations  
8 contained in this Paragraph of the SAC, and therefore denies them.

9 101. Google denies the allegations in Paragraph 101 of the SAC insofar as  
10 they purport to attribute to the '014 patent anything that is not stated therein. Google  
11 is currently without knowledge or information sufficient to form a belief as to the  
12 truth or falsity of the remaining allegations and characterizations contained in this  
13 Paragraph of the SAC, and therefore denies them.

14 102. Google denies the allegations in Paragraph 102 of the SAC insofar as  
15 they purport to attribute to the '014 patent anything that is not stated therein. Google  
16 is currently without knowledge or information sufficient to form a belief as to the  
17 truth or falsity of the remaining allegations and characterizations contained in this  
18 Paragraph of the SAC, and therefore denies them.

19 103. Google denies the allegations in Paragraph 103 of the SAC insofar as  
20 they purport to attribute to the '014 patent anything that is not stated therein. Google  
21 is currently without knowledge or information sufficient to form a belief as to the  
22 truth or falsity of the remaining allegations and characterizations contained in this  
23 Paragraph of the SAC, and therefore denies them.

24 104. Google admits that Exhibit 51 purports to be a copy of a memorandum  
25 opinion issued by the District Court of Delaware in from *Sonos, Inc. v. D&M Holdings*  
26 *Inc.*, Civil Action No. 14-1330-WCB (D. Del.). Google denies the allegations in  
27 Paragraph 104 of the SAC insofar as they purport to attribute to the '014 patent  
28 anything that is not stated therein. Google denies that the '014 patent is valid under

1 Section 101. Google is currently without knowledge or information sufficient to form  
2 a belief as to the truth or falsity of the remaining allegations and characterizations  
3 contained in this Paragraph of the SAC, and therefore denies them.

4 105. Google denies the allegations in Paragraph 105 of the SAC insofar as  
5 they purport to attribute to the '014 patent anything that is not stated therein. Google  
6 denies that the '014 patent is valid under Section 101. Google is currently without  
7 knowledge or information sufficient to form a belief as to the truth or falsity of the  
8 remaining allegations and characterizations contained in this Paragraph of the SAC,  
9 and therefore denies them.

10 106. Google admits that Exhibit 50 purports to be a verdict form from *Sonos,*  
11 *Inc. v. D&M Holdings Inc.*, Civil Action No. 14-1330-WCB (D. Del.) and Exhibit  
12 108 purports to be a copy of the '014 patent and Reexamination Certificate. Google  
13 denies the allegations in Paragraph 106 of the SAC insofar as they purport to attribute  
14 to the '014 patent anything that is not stated therein. Google denies that the '014 patent  
15 is valid under Section 101. Google is currently without knowledge or information  
16 sufficient to form a belief as to the truth or falsity of the remaining allegations and  
17 characterizations contained in this Paragraph of the SAC, and therefore denies them.

18 **The Alleged Inventions Claimed in U.S. Patent No. 7,571,014 Did Not Provide**  
19 **Important Advantages to Multi-Room Audio Systems**

20 107. Google admits that Exhibits 8, 52, 53, and 54 to the SAC purport to be  
21 articles from, respectively, PC Magazine, Playlist, Gizmodo, and Pocket-lint. Google  
22 is currently without knowledge or information sufficient to form a belief as to the  
23 truth or falsity of the remaining allegations and characterizations contained in  
24 Paragraph 107 of the SAC, and therefore denies them.

25 108. Google admits that Exhibits 29 and 55 purport to be printed copies of  
26 Google websites. Google denies the allegations in Paragraph 108 that relate to  
27 Google. To the extent the allegations relate to entities other than Google, Google is  
28 currently without knowledge or information sufficient to form a belief as to the truth

1 or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 109. Google admits that Exhibit 56 purports to be an article from the *Verge*.  
4 Google is currently without knowledge or information sufficient to form a belief as to  
5 the truth or falsity of the remaining allegations and characterizations contained in  
6 Paragraph 109 of the SAC, and therefore denies them.

7 **U.S. Patent No. 8,588,949**

8 110. Google denies the allegations in Paragraph 110 of the SAC insofar as  
9 they purport to attribute to the '949 patent anything that is not stated therein. Google  
10 admits that the '949 patent is titled "Methods And Apparatus For Adjusting Volume  
11 Levels In A Multi-Zone System"; that the '949 patent bears an issuance date of  
12 November 19, 2023; that a Reexamination Certificate for the '949 patent was issued  
13 by the USPTO on November 5, 2015; and that Exhibit 1 purports to be a copy of the  
14 '949 patent and Reexamination Certificate. Google is currently without knowledge  
15 or information sufficient to form a belief as to the truth or falsity of the remaining  
16 allegations and characterizations contained in Paragraph 110 of the SAC, and  
17 therefore denies them.

18 111. Google denies the allegations in Paragraph 111 of the SAC insofar as  
19 they purport to attribute to the '949 patent anything that is not stated therein. Google  
20 is currently without knowledge or information sufficient to form a belief as to the  
21 truth or falsity of the remaining allegations and characterizations contained in this  
22 Paragraph of the SAC, and therefore denies them.

23 112. Google denies the allegations in Paragraph 112 of the Complaint insofar  
24 as they purport to attribute to the '949 patent anything that is not stated therein.  
25 Google is currently without knowledge or information sufficient to form a belief as to  
26 the truth or falsity of the remaining allegations and characterizations contained in this  
27 Paragraph of the SAC, and therefore denies them.

28

1 113. Google denies the allegations in Paragraph 113 of the Complaint insofar  
2 as they purport to attribute to the '949 patent anything that is not stated therein.  
3 Google is currently without knowledge or information sufficient to form a belief as to  
4 the truth or falsity of the remaining allegations and characterizations contained in this  
5 Paragraph of the SAC, and therefore denies them.

6 **The Alleged Inventions Claimed in U.S. Patent No. 8,588,949 Did Not Improve**  
7 **Technology & Were Well Understood, Routine, or Conventional**

8 114. Google denies the allegations in Paragraph 114 of the SAC insofar as  
9 they purport to attribute to the '949 patent anything that is not stated therein. Google  
10 is currently without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 115. Google denies the allegations in Paragraph 115 of the Complaint insofar  
14 as they purport to attribute to the '949 patent anything that is not stated therein.  
15 Google is currently without knowledge or information sufficient to form a belief as to  
16 the truth or falsity of the remaining allegations and characterizations contained in this  
17 Paragraph of the SAC, and therefore denies them.

18 116. Google admits that Exhibit 8 purports to be an article from *PC Mag*.  
19 Except as specifically admitted, Google denies the allegations in Paragraph 116 of the  
20 SAC insofar as they purport to attribute to the '949 patent anything that is not stated  
21 therein. Google is currently without knowledge or information sufficient to form a  
22 belief as to the truth or falsity of the remaining allegations and characterizations  
23 contained in this Paragraph of the SAC, and therefore denies them.

24 117. Google admits that Exhibit 8 purports to be an article from *PC Mag*.  
25 Except as specifically admitted, Google denies the allegations in Paragraph 117 of the  
26 SAC insofar as they purport to attribute to the '949 patent anything that is not stated  
27 therein. Google is currently without knowledge or information sufficient to form a  
28

1 belief as to the truth or falsity of the remaining allegations and characterizations  
2 contained in this Paragraph of the SAC, and therefore denies them.

3 118. Google denies the allegations in Paragraph 118 of the SAC insofar as  
4 they purport to attribute to the '949 patent anything that is not stated therein. Google  
5 is currently without knowledge or information sufficient to form a belief as to the  
6 truth or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 119. Google denies the allegations in Paragraph 119 of the SAC insofar as  
9 they purport to attribute to the '949 patent anything that is not stated therein. Google  
10 is currently without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 120. Google admits that Exhibit 51 purports to be a copy of a memorandum  
14 opinion issued by the District Court of Delaware in from *Sonos, Inc. v. D&M Holdings*  
15 *Inc.*, Civil Action No. 14-1330-WCB (D. Del.). Google denies the allegations in  
16 Paragraph 120 of the SAC insofar as they purport to attribute to the '949 patent  
17 anything that is not stated therein. Google denies that the '949 patent is valid under  
18 Section 101. Google is currently without knowledge or information sufficient to form  
19 a belief as to the truth or falsity of the remaining allegations and characterizations  
20 contained in this Paragraph of the SAC, and therefore denies them.

21 121. Google denies the allegations in Paragraph 121 of the SAC insofar as  
22 they purport to attribute to the '949 patent anything that is not stated therein. Google  
23 denies that the '949 patent is valid under Section 101. Google is currently without  
24 knowledge or information sufficient to form a belief as to the truth or falsity of the  
25 remaining allegations and characterizations contained in this Paragraph of the SAC,  
26 and therefore denies them.

27 122. Google admits that Exhibit 50 purports to be a verdict form from *Sonos,*  
28 *Inc. v. D&M Holdings Inc.*, Civil Action No. 14-1330-WCB (D. Del.) and Exhibit 1

1 purports to be a copy of the '949 patent and Reexamination Certificate. Google denies  
2 the allegations in Paragraph 122 of the SAC insofar as they purport to attribute to the  
3 '949 patent anything that is not stated therein. Google denies that the '949 patent is  
4 valid under Section 101. Google is currently without knowledge or information  
5 sufficient to form a belief as to the truth or falsity of the remaining allegations and  
6 characterizations contained in this Paragraph of the SAC, and therefore denies them.

7 **The Alleged Inventions Claimed in U.S. Patent No. 8,588,949 Did Not Provide**  
8 **Important Advantages to Wireless Audio Systems**

9 123. Google admits that Exhibits 8, 52, 53, and 54 to the Complaint purport  
10 to be articles from, respectively, PC Magazine, Playlist, Gizmodo, and Pocket-lint.  
11 Google is currently without knowledge or information sufficient to form a belief as to  
12 the truth or falsity of the remaining allegations and characterizations contained in  
13 Paragraph 123 of the SAC, and therefore denies them.

14 124. Google admits that Exhibit 29 and 55 purport to be printed copies of  
15 Google websites. Google denies the allegations in Paragraph 124 that relate to  
16 Google. To the extent the allegations relate to entities other than Google, Google is  
17 currently without knowledge or information sufficient to form a belief as to the truth  
18 or falsity of the remaining allegations and characterizations contained in this  
19 Paragraph of the SAC, and therefore denies them.

20 125. Google admits that Exhibit 56 purports to be an article from the *Verge*.  
21 Google is currently without knowledge or information sufficient to form a belief as to  
22 the truth or falsity of the remaining allegations and characterizations contained in  
23 Paragraph 125 of the SAC, and therefore denies them.

24 **U.S. Patent No. 9,195,258**

25 126. Google admits that Exhibit 2 purports to be a copy of the '258 patent.  
26 Google admits that the '258 Patent is titled "System and Method for Synchronizing  
27 Operations Among a Plurality of Independently Clocked Digital Data Processing  
28 Devices" and that it bears an issuance date of November 24, 2015. Google is currently

1 without knowledge or information sufficient to form a belief as to the truth or falsity  
2 of the remaining allegations and characterizations contained in Paragraph 126 of the  
3 SAC, and therefore denies them.

4 127. Google denies the allegations in Paragraph 127 of the SAC insofar as  
5 they purport to attribute to the '258 patent anything that is not stated therein. Google  
6 is currently without knowledge or information sufficient to form a belief as to the  
7 truth or falsity of the remaining allegations and characterizations contained in this  
8 Paragraph of the SAC, and therefore denies them.

9 128. Google denies the allegations in Paragraph 128 of the SAC insofar as  
10 they purport to attribute to the '258 patent anything that is not stated therein. Google  
11 is currently without knowledge or information sufficient to form a belief as to the  
12 truth or falsity of the remaining allegations and characterizations contained in this  
13 Paragraph of the SAC, and therefore denies them.

14 129. Google denies the allegations in Paragraph 129 of the SAC insofar as  
15 they purport to attribute to the '258 patent anything that is not stated therein. Google  
16 is currently without knowledge or information sufficient to form a belief as to the  
17 truth or falsity of the remaining allegations and characterizations contained in this  
18 Paragraph of the SAC, and therefore denies them.

19 130. Google denies the allegations in Paragraph 130 of the SAC insofar as  
20 they purport to attribute to the '258 patent anything that is not stated therein. Google  
21 is currently without knowledge or information sufficient to form a belief as to the  
22 truth or falsity of the remaining allegations and characterizations contained in this  
23 Paragraph of the SAC, and therefore denies them.

24 **The Alleged Inventions Claimed in U.S. Patent No. 9,195,258 Did Not Improve**  
25 **Technology & Were Well Understood, Routine, or Conventional**

26 131. Google denies the allegations in Paragraph 131 of the SAC insofar as  
27 they purport to attribute to the '258 patent anything that is not stated therein. Google  
28 is currently without knowledge or information sufficient to form a belief as to the

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 132. Google denies the allegations in Paragraph 132 of the SAC insofar as  
4 they purport to attribute to the '258 patent anything that is not stated therein. Google  
5 is currently without knowledge or information sufficient to form a belief as to the  
6 truth or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 133. Google admits that Exhibit 8 of the SAC purports to be an article from  
9 *PC Mag*. Google denies the allegations in Paragraph 133 of the SAC insofar as they  
10 purport to attribute to the '258 patent anything that is not stated therein. Google is  
11 currently without knowledge or information sufficient to form a belief as to the truth  
12 or falsity of the remaining allegations and characterizations contained in this  
13 Paragraph of the SAC, and therefore denies them.

14 134. Google admits that Exhibit 6 purports to be an article from *NBC News*.  
15 Google denies the allegations in Paragraph 134 of the SAC insofar as they purport to  
16 attribute to the '258 patent anything that is not stated therein. Google is currently  
17 without knowledge or information sufficient to form a belief as to the truth or falsity  
18 of the remaining allegations and characterizations contained in this Paragraph of the  
19 SAC, and therefore denies them.

20 135. Google denies the allegations in Paragraph 135 of the SAC insofar as  
21 they purport to attribute to the '258 patent anything that is not stated therein. Google  
22 is currently without knowledge or information sufficient to form a belief as to the  
23 truth or falsity of the remaining allegations and characterizations contained in this  
24 Paragraph of the SAC, and therefore denies them.

25 136. Google denies the allegations in Paragraph 136 of the SAC insofar as  
26 they purport to attribute to the '258 patent anything that is not stated therein. Google  
27 is currently without knowledge or information sufficient to form a belief as to the  
28

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 137. Google admits that Exhibit 57 purports to be a copy of a decision from  
4 the Patent Trial and Appeal Board (“PTAB”) regarding U.S. Patent No. 9,213,357.  
5 Google is currently without knowledge or information sufficient to form a belief as to  
6 the truth or falsity of the remaining allegations and characterizations contained in  
7 Paragraph 137 of the SAC, and therefore denies them.

8 138. Google admits that Exhibit 50 purports to be a verdict form from *Sonos,*  
9 *Inc. v. D&M Holdings Inc.*, Civil Action No. 14-1330-WCB (D. Del.). Google is  
10 currently without knowledge or information sufficient to form a belief as to the truth  
11 or falsity of the remaining allegations and characterizations contained in Paragraph  
12 138 of the SAC, and therefore denies them.

13 **The Alleged Inventions Claimed in U.S. Patent No. 9,195,258 Did Not Provide**  
14 **Important Advantages to Wireless Audio Systems**

15 139. Google denies the allegations in Paragraph 139 of the SAC insofar as  
16 they purport to attribute to the ’258 patent anything that is not stated therein. Google  
17 admits that Exhibits 8, 58, 59, and 6 purport to be articles from PC Magazine, the  
18 Wall Street Journal, Macworld, and NBC News, respectively. Google is currently  
19 without knowledge or information sufficient to form a belief as to the truth or falsity  
20 of the remaining allegations and characterizations contained in this Paragraph of the  
21 SAC, and therefore denies them.

22 140. Google admits that Exhibits 20 and 60 purport to be copies of Google  
23 websites. Google denies the remaining allegations and characterizations contained in  
24 Paragraph 140 of the SAC.

25 141. Google admits that Exhibits 29 and 61 purport to be copies of Google  
26 websites. Google denies the remaining allegations and characterizations contained in  
27 Paragraph 141 of the SAC.

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1 142. Google admits that Exhibits 21 and 24 purport to be articles from *Variety*  
2 and *The Verge*, respectively. Google admits that Exhibit 86 purports to be an Amazon  
3 press release. Google is currently without knowledge or information sufficient to form  
4 a belief as to the truth or falsity of the remaining allegations and characterizations  
5 contained in Paragraph 142 of the SAC, and therefore denies them.

6 **U.S. Patent No. 9,219,959**

7 143. Google denies the allegations in Paragraph 143 of the SAC insofar as  
8 they purport to attribute to the '959 patent anything that is not stated therein. Google  
9 admits that the '959 patent is titled "Multi Channel Pairing in a Media System"; that  
10 the '959 patent bears an issuance date of December 22, 2015; that a Reexamination  
11 Certificate for the '959 patent was issued by the USPTO on April 5, 2017; and that  
12 Exhibit 3 purports to be a copy of the '959 patent and Reexamination Certificate.  
13 Google is currently without knowledge or information sufficient to form a belief as to  
14 the truth or falsity of the remaining allegations and characterizations contained in  
15 Paragraph 143 of the SAC, and therefore denies them.

16 144. Google denies the allegations in Paragraph 144 of the SAC insofar as  
17 they purport to attribute to the '959 patent anything that is not stated therein. Google  
18 is currently without knowledge or information sufficient to form a belief as to the  
19 truth or falsity of the remaining allegations and characterizations contained in this  
20 Paragraph of the SAC, and therefore denies them.

21 145. Google denies the allegations in Paragraph 145 of the SAC insofar as  
22 they purport to attribute to the '959 patent anything that is not stated therein. Google  
23 is currently without knowledge or information sufficient to form a belief as to the  
24 truth or falsity of the remaining allegations and characterizations contained in this  
25 Paragraph of the SAC, and therefore denies them.

26 146. Google denies the allegations in Paragraph 146 of the SAC insofar as  
27 they purport to attribute to the '959 patent anything that is not stated therein. Google  
28 is currently without knowledge or information sufficient to form a belief as to the

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 **The Alleged Inventions Claimed in U.S. Patent No. 9,219,959 Did Not Improve**  
4 **Technology & Were Well Understood, Routine, or Conventional**

5 147. Google denies the allegations in Paragraph 147 of the SAC insofar as  
6 they purport to attribute to the '959 patent anything that is not stated therein. Google  
7 is currently without knowledge or information sufficient to form a belief as to the  
8 truth or falsity of the remaining allegations and characterizations contained in this  
9 Paragraph of the SAC, and therefore denies them.

10 148. Google denies the allegations in Paragraph 148 of the SAC insofar as  
11 they purport to attribute to the '959 patent anything that is not stated therein. Google  
12 is currently without knowledge or information sufficient to form a belief as to the  
13 truth or falsity of the remaining allegations and characterizations contained in this  
14 Paragraph of the SAC, and therefore denies them.

15 149. Google denies the allegations in Paragraph 149 of the SAC insofar as  
16 they purport to attribute to the '959 patent anything that is not stated therein. Google  
17 is currently without knowledge or information sufficient to form a belief as to the  
18 truth or falsity of the remaining allegations and characterizations contained in this  
19 Paragraph of the SAC, and therefore denies them.

20 150. Google denies the allegations in Paragraph 150 of the SAC insofar as  
21 they purport to attribute to the '959 patent anything that is not stated therein. Google  
22 is currently without knowledge or information sufficient to form a belief as to the  
23 truth or falsity of the remaining allegations and characterizations contained in this  
24 Paragraph of the SAC, and therefore denies them.

25 151. Google denies the allegations in Paragraph 151 of the SAC insofar as  
26 they purport to attribute to the '959 patent anything that is not stated therein. Google  
27 is currently without knowledge or information sufficient to form a belief as to the  
28

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 152. Google admits that Exhibit 51 purports to be a copy of a memorandum  
4 opinion issued by the District Court of Delaware in *Sonos, Inc. v. D&M Holdings*  
5 *Inc.*, Civil Action No. 14-1330-WCB (D. Del.). Google denies that the '959 patent is  
6 valid under Section 101. Google is currently without knowledge or information  
7 sufficient to form a belief as to the truth or falsity of the remaining allegations and  
8 characterizations contained in Paragraph 152 of the SAC, and therefore denies them.

9 153. Google admits that Exhibit 51 purports to be a copy of a memorandum  
10 opinion issued by the District Court of Delaware in *Sonos, Inc. v. D&M Holdings*  
11 *Inc.*, Civil Action No. 14-1330-WCB (D. Del.). Google denies that the '959 patent is  
12 valid under Section 101. Google is currently without knowledge or information  
13 sufficient to form a belief as to the truth or falsity of the remaining allegations and  
14 characterizations contained in Paragraph 153 of the SAC, and therefore denies them.

15 154. Google admits that Exhibit 3 purports to be a copy of the '959 patent and  
16 Reexamination Certificate. Google denies that the '959 patent is valid under Section  
17 101. Google is currently without knowledge or information sufficient to form a belief  
18 as to the truth or falsity of the remaining allegations and characterizations contained  
19 in Paragraph 154 of the SAC, and therefore denies them.

20 **The Alleged Inventions Claimed in U.S. Patent No. 9,219,959 Did Not Provide**  
21 **Important Advantages to Wireless Audio Systems**

22 155. Google admits that Exhibits 62-66 of the Complaint purport to be,  
23 respectively, articles from *SlashGear*, *Trusted Reviews*, *Consumer Reports*,  
24 *Businessweek*, and *What Hi-Fi*. Google is currently without knowledge or information  
25 sufficient to form a belief as to the truth or falsity of the remaining allegations and  
26 characterizations contained in Paragraph 155 of the SAC, and therefore denies them.

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28

1 156. Google admits that Exhibit 67 of the SAC appears to be a printout of a  
2 webpage discussing Google products. Except as expressly admitted, Google denies  
3 the allegations of Paragraph 156 of the SAC.

4 157. Google admits that Exhibit 68 of the SAC appears to be a printout of a  
5 webpage discussing Google products. Except as expressly admitted, Google denies  
6 the allegations of Paragraph 157 of the SAC.

7 158. Google admits that Exhibit 69 of the SAC appears to be a printout of a  
8 webpage discussing Google products. Except as expressly admitted, Google denies  
9 the allegations of Paragraph 157 of the SAC.

10 159. Google admits that Exhibit 70 of the SAC appears to be a printout of a  
11 webpage discussing Google products. Except as expressly admitted, Google denies  
12 the allegations of Paragraph 158 of the SAC.

13 160. Google admits that Exhibits 71-73 of the Complaint purport to be,  
14 respectively, articles from *Engadget*, *Digital Trends*, and *The Verge*. Google is  
15 currently without knowledge or information sufficient to form a belief as to the truth  
16 or falsity of the remaining allegations and characterizations contained in Paragraph  
17 159 of the SAC, and therefore denies them.

18 161. Google admits that Exhibits 74-75 of the SAC appear to be, respectively,  
19 articles from 9to5Google and Digital Trends discussing Google products. Google is  
20 currently without knowledge or information sufficient to form a belief as to the truth  
21 or falsity of the remaining allegations and characterizations contained in Paragraph  
22 160 of the SAC, and therefore denies them.

23 **U.S. Patent No. 10,031,715**

24 162. Google denies the allegations in Paragraph 162 of the SAC insofar as  
25 they purport to attribute to the '715 patent anything that is not stated therein. Google  
26 admits that Exhibit 109 of the SAC purports to be a copy of the '715 patent. Google  
27 admits that the '715 patent is entitled "Method and Apparatus for Dynamic Master  
28 Device Switching in a Synchrony Group" and that it bears an issuance date of July

1 24, 2018. Google is currently without knowledge or information sufficient to form a  
2 belief as to the truth or falsity of the remaining allegations and characterizations  
3 contained in this Paragraph of the SAC, and therefore denies them.

4 163. Google denies the allegations in Paragraph 163 of the SAC insofar as  
5 they purport to attribute to the '715 patent anything that is not stated therein. Google  
6 is currently without knowledge or information sufficient to form a belief as to the  
7 truth or falsity of the remaining allegations and characterizations contained in this  
8 Paragraph of the SAC, and therefore denies them.

9 164. Google denies the allegations in Paragraph 164 of the SAC insofar as  
10 they purport to attribute to the '715 patent anything that is not stated therein. Google  
11 is currently without knowledge or information sufficient to form a belief as to the  
12 truth or falsity of the remaining allegations and characterizations contained in this  
13 Paragraph of the SAC, and therefore denies them.

14 165. Google incorporates by reference each of its responses to Paragraphs  
15 126-30 of the SAC set forth above as if fully set forth herein.

16 **The Alleged Inventions Claimed in U.S. Patent No. 10,031,715 Did Not Improve**  
17 **Technology & Were Well Understood, Routine, or Conventional**

18 166. Google incorporates by reference each of its responses to Paragraphs  
19 131-38 of the SAC set forth above as if fully set forth herein

20 167. Google denies the allegations in Paragraph 167 of the SAC insofar as  
21 they purport to attribute to the '258 or '715 patents anything that is not stated therein.  
22 Google is currently without knowledge or information sufficient to form a belief as to  
23 the truth or falsity of the remaining allegations and characterizations contained in this  
24 Paragraph of the SAC, and therefore denies them.

25 168. Google denies the allegations in Paragraph 168 of the SAC insofar as  
26 they purport to attribute to the '715 patent anything that is not stated therein. Google  
27 is currently without knowledge or information sufficient to form a belief as to the  
28

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 169. Google denies the allegations in Paragraph 169 of the SAC insofar as  
4 they purport to attribute to the '715 patent anything that is not stated therein. Google  
5 is currently without knowledge or information sufficient to form a belief as to the  
6 truth or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 170. Google denies the allegations in Paragraph 170 of the SAC insofar as  
9 they purport to attribute to the '715 patent anything that is not stated therein. Google  
10 is currently without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 171. Google denies the allegations in Paragraph 171 of the SAC insofar as  
14 they purport to attribute to the '715 patent anything that is not stated therein. Google  
15 is currently without knowledge or information sufficient to form a belief as to the  
16 truth or falsity of the remaining allegations and characterizations contained in this  
17 Paragraph of the SAC, and therefore denies them.

18 **The Alleged Inventions Claimed in U.S. Patent No. 10,031,715 Did Not Provide**  
19 **Important Advantages to Wireless Audio Systems**

20 172. Google incorporates by reference each of its responses to Paragraphs  
21 139-42 of the SAC set forth above as if fully set forth herein.

22 173. Google admits that Exhibit 122 of the SAC appears to be excerpts of  
23 testimony from a Google engineer. Google denies the allegations in Paragraph 173  
24 of the SAC insofar as they purport to attribute to the '715 patent anything that is not  
25 stated therein. Google is currently without knowledge or information sufficient to  
26 form a belief as to the truth or falsity of the remaining allegations and  
27 characterizations contained in this Paragraph of the SAC, and therefore denies them.  
28

1 **U.S. Patent No. 10,209,953**

2 174. Google denies the allegations in Paragraph 174 of the SAC insofar as  
3 they purport to attribute to the '953 patent anything that is not stated therein. Google  
4 admits that Exhibit 4 of the SAC purports to be a copy of the '953 patent. Google  
5 admits that the '953 patent is entitled "Playback Device" and that it bears an issuance  
6 date of February 19, 2019. Google is currently without knowledge or information  
7 sufficient to form a belief as to the truth or falsity of the remaining allegations and  
8 characterizations contained in this Paragraph of the SAC, and therefore denies them.

9 175. Google denies the allegations in Paragraph 175 of the SAC insofar as  
10 they purport to attribute to the '258, '715, and '953 patent anything that is not stated  
11 therein. Google is currently without knowledge or information sufficient to form a  
12 belief as to the truth or falsity of the remaining allegations and characterizations  
13 contained in this Paragraph of the SAC, and therefore denies them.

14 176. Google denies the allegations in Paragraph 176 of the SAC insofar as  
15 they purport to attribute to the '953 patent anything that is not stated therein. Google  
16 is currently without knowledge or information sufficient to form a belief as to the  
17 truth or falsity of the remaining allegations and characterizations contained in this  
18 Paragraph of the SAC, and therefore denies them.

19 177. Google incorporates by reference each of its responses to Paragraphs  
20 126-30 of the SAC set forth above as if fully set forth herein.

21 **The Alleged Inventions Claimed in U.S. Patent No. 10,209,953 Did Not Improve**  
22 **Technology & Were Well Understood, Routine, or Conventional**

23 178. Google incorporates by reference each of its responses to Paragraphs  
24 131-38 of the SAC set forth above as if fully set forth herein

25 179. Google denies the allegations in Paragraph 179 of the SAC insofar as  
26 they purport to attribute to the '258 or '953 patents anything that is not stated therein.  
27 Google is currently without knowledge or information sufficient to form a belief as to  
28

1 the truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 180. Google admits that Exhibit 8 purports to be an article from PC Mag.  
4 Google denies the allegations in Paragraph 180 of the SAC insofar as they purport to  
5 attribute to the '953 patent anything that is not stated therein. Google is currently  
6 without knowledge or information sufficient to form a belief as to the truth or falsity  
7 of the remaining allegations and characterizations contained in this Paragraph of the  
8 SAC, and therefore denies them.

9 181. Google admits that Exhibit 6 purports to be an article from NBC News.  
10 Google denies the allegations in Paragraph 181 of the SAC insofar as they purport to  
11 attribute to the '953 patent anything that is not stated therein. Google is currently  
12 without knowledge or information sufficient to form a belief as to the truth or falsity  
13 of the remaining allegations and characterizations contained in this Paragraph of the  
14 SAC, and therefore denies them.

15 182. Google admits that Exhibit 6 purports to be an article from NBC News.  
16 Google denies the allegations in Paragraph 182 of the SAC insofar as they purport to  
17 attribute to the '953 patent anything that is not stated therein. Google is currently  
18 without knowledge or information sufficient to form a belief as to the truth or falsity  
19 of the remaining allegations and characterizations contained in this Paragraph of the  
20 SAC, and therefore denies them.

21 183. Google denies the allegations in Paragraph 183 of the SAC insofar as  
22 they purport to attribute to the '953 patent anything that is not stated therein. Google  
23 is currently without knowledge or information sufficient to form a belief as to the  
24 truth or falsity of the remaining allegations and characterizations contained in this  
25 Paragraph of the SAC, and therefore denies them.

26 184. Google denies the allegations in Paragraph 184 of the SAC insofar as  
27 they purport to attribute to the '953 patent anything that is not stated therein. Google  
28 is currently without knowledge or information sufficient to form a belief as to the

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 **The Alleged Inventions Claimed in U.S. Patent No. 10,209,953 Did Not Provide**  
4 **Important Advantages to Wireless Audio Systems**

5 185. Google incorporates by reference each of its responses to Paragraphs  
6 139-42 of the SAC set forth above as if fully set forth herein.

7 186. Google denies the allegations in Paragraph 186 of the SAC insofar as  
8 they purport to attribute to the '258 or '953 patents anything that is not stated therein.  
9 Google is currently without knowledge or information sufficient to form a belief as to  
10 the truth or falsity of the remaining allegations and characterizations contained in this  
11 Paragraph of the SAC, and therefore denies them.

12 **U.S. Patent No. 10,439,896**

13 187. Google denies the allegations in Paragraph 187 of the SAC insofar as  
14 they purport to attribute to the '896 patent anything that is not stated therein. Google  
15 admits that Exhibit 5 of the Complaint purports to be a copy of the '896 patent. Google  
16 admits that the '896 patent is entitled "Playback Device Connection" and that it bears  
17 an issuance date of October 8, 2019. Google is currently without knowledge or  
18 information sufficient to form a belief as to the truth or falsity of the remaining  
19 allegations and characterizations contained in this Paragraph of the SAC, and  
20 therefore denies them.

21 188. Google denies the allegations in Paragraph 188 of the SAC insofar as  
22 they purport to attribute to the '896 patent anything that is not stated therein. Google  
23 is currently without knowledge or information sufficient to form a belief as to the  
24 truth or falsity of the remaining allegations and characterizations contained in this  
25 Paragraph of the SAC, and therefore denies them.

26 189. Google denies the allegations in Paragraph 189 of the SAC insofar as  
27 they purport to attribute to the '896 patent anything that is not stated therein. Google  
28 is currently without knowledge or information sufficient to form a belief as to the

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 190. Google denies the allegations in Paragraph 190 of the SAC insofar as  
4 they purport to attribute to the '896 patent anything that is not stated therein. Google  
5 is currently without knowledge or information sufficient to form a belief as to the  
6 truth or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 191. Google denies the allegations in Paragraph 191 of the SAC insofar as  
9 they purport to attribute to the '896 patent anything that is not stated therein. Google  
10 is currently without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 192. Google denies the allegations in Paragraph 192 of the SAC insofar as  
14 they purport to attribute to the '896 patent anything that is not stated therein. Google  
15 is currently without knowledge or information sufficient to form a belief as to the  
16 truth or falsity of the remaining allegations and characterizations contained in this  
17 Paragraph of the SAC, and therefore denies them.

18 **The Alleged Inventions Claimed in U.S. Patent No. 10,439,896 Did Not Improve**  
19 **Technology & Were Well Understood, Routine, or Conventional**

20 193. Google denies the allegations in Paragraph 193 of the SAC insofar as  
21 they purport to attribute to the '896 patent anything that is not stated therein. Google  
22 is currently without knowledge or information sufficient to form a belief as to the  
23 truth or falsity of the remaining allegations and characterizations contained in this  
24 Paragraph of the SAC, and therefore denies them.

25 194. Google denies the allegations in Paragraph 194 of the SAC insofar as  
26 they purport to attribute to the '896 patent anything that is not stated therein. Google  
27 is currently without knowledge or information sufficient to form a belief as to the  
28

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 195. Google denies the allegations in Paragraph 195 of the SAC insofar as  
4 they purport to attribute to the '896 patent anything that is not stated therein. Google  
5 is currently without knowledge or information sufficient to form a belief as to the  
6 truth or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 196. Google denies the allegations in Paragraph 196 of the SAC insofar as  
9 they purport to attribute to the '896 patent anything that is not stated therein. Google  
10 is currently without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 197. Google denies the allegations in Paragraph 197 of the SAC insofar as  
14 they purport to attribute to the '896 patent anything that is not stated therein. Google  
15 is currently without knowledge or information sufficient to form a belief as to the  
16 truth or falsity of the remaining allegations and characterizations contained in this  
17 Paragraph of the SAC, and therefore denies them.

18 198. Google denies the allegations in Paragraph 198 of the SAC insofar as  
19 they purport to attribute to the '896 patent anything that is not stated therein. Google  
20 is currently without knowledge or information sufficient to form a belief as to the  
21 truth or falsity of the remaining allegations and characterizations contained in this  
22 Paragraph of the SAC, and therefore denies them.

23 199. Google is currently without knowledge or information sufficient to form  
24 a belief as to the truth or falsity of the remaining allegations and characterizations  
25 contained in Paragraph 199 of the SAC, and therefore denies them.

26 200. Google denies the allegations in Paragraph 200 of the SAC insofar as  
27 they purport to attribute to the '896 patent anything that is not stated therein. Google  
28 is currently without knowledge or information sufficient to form a belief as to the

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 **The Alleged Inventions Claimed in U.S. Patent No. 10,439,896 Did Not Provide**  
4 **Important Advantages to Wireless Audio Systems**

5 201. Google denies the allegations in Paragraph 201 of the SAC insofar as  
6 they purport to attribute to the '896 patent anything that is not stated therein. Google  
7 admits that Exhibit 76 of the SAC purports to be an article from *Ars Technica*. Google  
8 is currently without knowledge or information sufficient to form a belief as to the  
9 truth or falsity of the remaining allegations and characterizations contained in this  
10 Paragraph of the SAC, and therefore denies them.

11 202. Google denies the allegations in Paragraph 202 of the SAC insofar as  
12 they purport to attribute to the '896 patent anything that is not stated therein. Google  
13 admits that Exhibits 77-78 of the SAC purport to be, respectively, articles from  
14 *Gizmodo* and *Consumer Reports*. Google is currently without knowledge or  
15 information sufficient to form a belief as to the truth or falsity of the remaining  
16 allegations and characterizations contained in this Paragraph of the SAC, and  
17 therefore denies them.

18 203. Google admits that Exhibits 79-80 of the SAC appear to be printouts of  
19 webpages discussing Google products. Except as expressly admitted, Google denies  
20 the allegations of Paragraph 203 the of SAC.

21 204. Google admits that Exhibits 81-83 of the SAC purport to be,  
22 respectively, articles from *Android Central*, *Tom's Guide*, and CNET. Google is  
23 currently without knowledge or information sufficient to form a belief as to the truth  
24 or falsity of the remaining allegations and characterizations contained in this  
25 Paragraph of the SAC, and therefore denies them.

26 **U.S. Patent No. 11,080,001**

27 205. Google denies the allegations in Paragraph 205 of the SAC insofar as  
28 they purport to attribute to the '001 patent anything that is not stated therein. Google

1 admits that Exhibit 110 of the SAC purports to be a copy of the '001 patent. Google  
2 admits that the '001 patent is entitled "Concurrent Transmission and Playback of  
3 Audio Information" and that it bears an issuance date of August 3, 2021. Google is  
4 currently without knowledge or information sufficient to form a belief as to the truth  
5 or falsity of the remaining allegations and characterizations contained in this  
6 Paragraph of the SAC, and therefore denies them.

7 206. Google denies the allegations in Paragraph 206 of the SAC insofar as  
8 they purport to attribute to the '001 patent anything that is not stated therein. Google  
9 is currently without knowledge or information sufficient to form a belief as to the  
10 truth or falsity of the remaining allegations and characterizations contained in this  
11 Paragraph of the SAC, and therefore denies them.

12 207. Google denies the allegations in Paragraph 207 of the SAC insofar as  
13 they purport to attribute to the '001 patent anything that is not stated therein. Google  
14 is currently without knowledge or information sufficient to form a belief as to the  
15 truth or falsity of the remaining allegations and characterizations contained in this  
16 Paragraph of the SAC, and therefore denies them.

17 208. Google incorporates by reference each of its responses to Paragraphs  
18 126-30 of the SAC set forth above as if fully set forth herein.

19 **The Alleged Inventions Claimed in U.S. Patent No. 11,080,001 Did Not Improve**  
20 **Technology & Were Well Understood, Routine, or Conventional**

21 209. Google incorporates by reference each of its responses to Paragraphs  
22 131-38, 166-71, and 178-84 of the SAC set forth above as if fully set forth herein

23 210. Google denies the allegations in Paragraph 210 of the SAC insofar as  
24 they purport to attribute to the '258, '715, '953, and '001 patents anything that is not  
25 stated therein. Google is currently without knowledge or information sufficient to  
26 form a belief as to the truth or falsity of the remaining allegations and  
27 characterizations contained in this Paragraph of the SAC, and therefore denies them.  
28

1 211. Google denies the allegations in Paragraph 211 of the SAC insofar as  
2 they purport to attribute to the '258, '715, '953, and '001 patents anything that is not  
3 stated therein. Google is currently without knowledge or information sufficient to  
4 form a belief as to the truth or falsity of the remaining allegations and  
5 characterizations contained in this Paragraph of the SAC, and therefore denies them.

6 212. Google denies the allegations in Paragraph 212 of the SAC insofar as  
7 they purport to attribute to the '001 patent anything that is not stated therein. Google  
8 is currently without knowledge or information sufficient to form a belief as to the  
9 truth or falsity of the remaining allegations and characterizations contained in this  
10 Paragraph of the SAC, and therefore denies them.

11 213. Google denies the allegations in Paragraph 213 of the SAC insofar as  
12 they purport to attribute to the '001 patent anything that is not stated therein. Google  
13 is currently without knowledge or information sufficient to form a belief as to the  
14 truth or falsity of the remaining allegations and characterizations contained in this  
15 Paragraph of the SAC, and therefore denies them.

16 214. Google denies the allegations in Paragraph 214 of the SAC insofar as  
17 they purport to attribute to the '001 patent anything that is not stated therein. Google  
18 is currently without knowledge or information sufficient to form a belief as to the  
19 truth or falsity of the remaining allegations and characterizations contained in this  
20 Paragraph of the SAC, and therefore denies them.

21 215. Google denies the allegations in Paragraph 215 of the SAC insofar as  
22 they purport to attribute to the '001 patent anything that is not stated therein. Google  
23 is currently without knowledge or information sufficient to form a belief as to the  
24 truth or falsity of the remaining allegations and characterizations contained in this  
25 Paragraph of the SAC, and therefore denies them.

26 216. Google denies the allegations in Paragraph 216 of the SAC insofar as  
27 they purport to attribute to the '001 patent anything that is not stated therein. Google  
28 is currently without knowledge or information sufficient to form a belief as to the

1 truth or falsity of the remaining allegations and characterizations contained in this  
2 Paragraph of the SAC, and therefore denies them.

3 217. Google denies the allegations in Paragraph 217 of the SAC insofar as  
4 they purport to attribute to the '001 patent anything that is not stated therein. Google  
5 is currently without knowledge or information sufficient to form a belief as to the  
6 truth or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 218. Google denies the allegations in Paragraph 218 of the SAC insofar as  
9 they purport to attribute to the '001 patent anything that is not stated therein. Google  
10 is currently without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 **The Alleged Inventions Claimed in U.S. Patent No. 11,080,001 Did Not Provide**  
14 **Important Advantages to Wireless Audio Systems**

15 219. Google incorporates by reference each of its responses to Paragraphs  
16 139-42 and 173 of the SAC set forth above as if fully set forth herein.

17 220. Google denies the allegations in Paragraph 220 of the SAC insofar as  
18 they purport to attribute to the '258, '715, '953, and '001 patents anything that is not  
19 stated therein. Google is currently without knowledge or information sufficient to  
20 form a belief as to the truth or falsity of the remaining allegations and  
21 characterizations contained in this Paragraph of the SAC, and therefore denies them.

22 **U.S. Patent No. 10,966,025**

23 221. Google denies the allegations in Paragraph 221 of the SAC insofar as  
24 they purport to attribute to the '025 patent anything that is not stated therein. Google  
25 admits that Exhibit 130 of the SAC purports to be a copy of the '025 patent. Google  
26 admits that the '025 patent is entitled "Playback Device Pairing" and that it bears an  
27 issuance date of March 30, 2021. Google is currently without knowledge or  
28 information sufficient to form a belief as to the truth or falsity of the remaining

1 allegations and characterizations contained in this Paragraph of the SAC, and  
2 therefore denies them.

3 222. Google denies the allegations in Paragraph 222 of the SAC insofar as  
4 they purport to attribute to the '025 patent anything that is not stated therein. Google  
5 is currently without knowledge or information sufficient to form a belief as to the  
6 truth or falsity of the remaining allegations and characterizations contained in this  
7 Paragraph of the SAC, and therefore denies them.

8 223. Google denies the allegations in Paragraph 223 of the SAC insofar as  
9 they purport to attribute to the '025 patent anything that is not stated therein. Google  
10 is currently without knowledge or information sufficient to form a belief as to the  
11 truth or falsity of the remaining allegations and characterizations contained in this  
12 Paragraph of the SAC, and therefore denies them.

13 224. Google incorporates by reference each of its responses to Paragraphs  
14 143-46 of the SAC set forth above as if fully set forth herein.

15 **The Alleged Inventions Claimed in U.S. Patent No. 10,966,025 Did Not Improve**  
16 **Technology & Were Well Understood, Routine, or Conventional**

17 225. Google incorporates by reference each of its responses to Paragraphs  
18 147-54 of the SAC set forth above as if fully set forth herein

19 226. Google denies the allegations in Paragraph 226 of the SAC insofar as  
20 they purport to attribute to the '959 and '001 patents anything that is not stated therein.  
21 Google is currently without knowledge or information sufficient to form a belief as to  
22 the truth or falsity of the remaining allegations and characterizations contained in this  
23 Paragraph of the SAC, and therefore denies them.

24 227. Google denies the allegations in Paragraph 227 of the SAC insofar as  
25 they purport to attribute to the '025 patent anything that is not stated therein. Google  
26 is currently without knowledge or information sufficient to form a belief as to the  
27 truth or falsity of the remaining allegations and characterizations contained in this  
28 Paragraph of the SAC, and therefore denies them.

1 228. Google denies the allegations in Paragraph 228 of the SAC insofar as  
2 they purport to attribute to the '025 patent anything that is not stated therein. Google  
3 is currently without knowledge or information sufficient to form a belief as to the  
4 truth or falsity of the remaining allegations and characterizations contained in this  
5 Paragraph of the SAC, and therefore denies them.

6 229. Google denies the allegations in Paragraph 229 of the SAC insofar as  
7 they purport to attribute to the '025 patent anything that is not stated therein. Google  
8 is currently without knowledge or information sufficient to form a belief as to the  
9 truth or falsity of the remaining allegations and characterizations contained in this  
10 Paragraph of the SAC, and therefore denies them.

11 230. Google denies the allegations in Paragraph 230 of the SAC insofar as  
12 they purport to attribute to the '025 patent anything that is not stated therein. Google  
13 is currently without knowledge or information sufficient to form a belief as to the  
14 truth or falsity of the remaining allegations and characterizations contained in this  
15 Paragraph of the SAC, and therefore denies them.

16 **The Alleged Inventions Claimed in U.S. Patent No. 10,966,025 Did Not Provide**  
17 **Important Advantages to Wireless Audio Systems**

18 231. Google incorporates by reference each of its responses to Paragraphs  
19 155-61 of the SAC set forth above as if fully set forth herein.

20 232. Google denies the allegations in Paragraph 232 of the SAC insofar as  
21 they purport to attribute to the '959 and '025 patents anything that is not stated therein.  
22 Google is currently without knowledge or information sufficient to form a belief as to  
23 the truth or falsity of the remaining allegations and characterizations contained in this  
24 Paragraph of the SAC, and therefore denies them.

25 **U.S. Patent No. 10,541,883**

26 233. Google denies the allegations in Paragraph 233 of the SAC insofar as  
27 they purport to attribute to the '883 patent anything that is not stated therein. Google  
28 admits that Exhibit 131 of the SAC purports to be a copy of the '883 patent. Google

1 admits that the '883 patent is entitled "Playback Device Connection" and that it bears  
2 an issuance date of January 21, 2020. Google is currently without knowledge or  
3 information sufficient to form a belief as to the truth or falsity of the remaining  
4 allegations and characterizations contained in this Paragraph of the SAC, and  
5 therefore denies them.

6 234. Google denies the allegations in Paragraph 234 of the SAC insofar as  
7 they purport to attribute to the '883 patent anything that is not stated therein. Google  
8 is currently without knowledge or information sufficient to form a belief as to the  
9 truth or falsity of the remaining allegations and characterizations contained in this  
10 Paragraph of the SAC, and therefore denies them.

11 235. Google denies the allegations in Paragraph 235 of the SAC insofar as  
12 they purport to attribute to the '883 patent anything that is not stated therein. Google  
13 is currently without knowledge or information sufficient to form a belief as to the  
14 truth or falsity of the remaining allegations and characterizations contained in this  
15 Paragraph of the SAC, and therefore denies them.

16 236. Google incorporates by reference each of its responses to Paragraphs  
17 187-92 of the SAC set forth above as if fully set forth herein.

18 **The Alleged Inventions Claimed in U.S. Patent No. 10,541,883 Did Not Improve**  
19 **Technology & Were Well Understood, Routine, or Conventional**

20 237. Google incorporates by reference each of its responses to Paragraphs  
21 193-200 of the SAC set forth above as if fully set forth herein

22 238. Google denies the allegations in Paragraph 238 of the SAC insofar as  
23 they purport to attribute to the '896 and '883 patents anything that is not stated therein.  
24 Google is currently without knowledge or information sufficient to form a belief as to  
25 the truth or falsity of the remaining allegations and characterizations contained in this  
26 Paragraph of the SAC, and therefore denies them.

27 239. Google denies the allegations in Paragraph 239 of the SAC insofar as  
28 they purport to attribute to the '883 patent anything that is not stated therein. Google

1 is currently without knowledge or information sufficient to form a belief as to the  
2 truth or falsity of the remaining allegations and characterizations contained in this  
3 Paragraph of the SAC, and therefore denies them.

4 240. Google denies the allegations in Paragraph 240 of the SAC insofar as  
5 they purport to attribute to the '883 patent anything that is not stated therein. Google  
6 is currently without knowledge or information sufficient to form a belief as to the  
7 truth or falsity of the remaining allegations and characterizations contained in this  
8 Paragraph of the SAC, and therefore denies them.

9 241. Google denies the allegations in Paragraph 241 of the SAC insofar as  
10 they purport to attribute to the '883 patent anything that is not stated therein. Google  
11 is currently without knowledge or information sufficient to form a belief as to the  
12 truth or falsity of the remaining allegations and characterizations contained in this  
13 Paragraph of the SAC, and therefore denies them.

14 242. Google denies the allegations in Paragraph 242 of the SAC insofar as  
15 they purport to attribute to the '883 patent anything that is not stated therein. Google  
16 is currently without knowledge or information sufficient to form a belief as to the  
17 truth or falsity of the remaining allegations and characterizations contained in this  
18 Paragraph of the SAC, and therefore denies them.

19 **The Alleged Inventions Claimed in U.S. Patent No. 10,541,883 Did Not Provide**  
20 **Important Advantages to Wireless Audio Systems**

21 243. Google incorporates by reference each of its responses to Paragraphs  
22 201-204 of the SAC set forth above as if fully set forth herein.

23 244. Google denies the allegations in Paragraph 244 of the SAC insofar as  
24 they purport to attribute to the '896 and '883 patents anything that is not stated therein.  
25 Google is currently without knowledge or information sufficient to form a belief as to  
26 the truth or falsity of the remaining allegations and characterizations contained in this  
27 Paragraph of the SAC, and therefore denies them.

28

1       **COUNT I: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 7,571,014**

2           245. Google incorporates by reference each of its responses to Paragraphs 85-  
3 109 of the SAC set forth above as if fully set forth herein.

4           246. Google denies the allegations and characterizations contained in  
5 Paragraph 246 of the SAC, and specifically denies it has committed acts of  
6 infringement. To the extent Paragraph 246 of the SAC contains conclusions of law,  
7 no response is necessary.

8           247. Google denies the allegations and characterizations contained in  
9 Paragraph 247 of the SAC, and specifically denies it has committed acts of  
10 infringement. To the extent Paragraph 247 of the SAC contains conclusions of law,  
11 no response is necessary.

12           248. Google denies the allegations and characterizations contained in  
13 Paragraph 248 of the SAC, and specifically denies it has committed acts of  
14 infringement. To the extent Paragraph 248 of the SAC contains conclusions of law,  
15 no response is necessary.

16           249. Google admits that Exhibits 29 and 84 purport to be printed copies of  
17 Google webpages. Google denies the remaining allegations and characterizations  
18 contained in Paragraph 249 of the SAC, and specifically denies it has committed acts  
19 of infringement. To the extent Paragraph 225 of the SAC contains conclusions of law,  
20 no response is necessary.

21           250. Google admits that Exhibits 29, 34-39, and 55 purport to be printed  
22 copies of Google webpages. Google denies the remaining allegations and  
23 characterizations contained in Paragraph 250 of the SAC, and specifically denies it  
24 has committed acts of infringement. To the extent Paragraph 250 of the SAC contains  
25 conclusions of law, no response is necessary.

26           251. Google admits that Exhibits 29, 84, and 85 purport to be printed copies  
27 of Google webpages. Google denies the remaining allegations and characterizations  
28 contained in Paragraph 251 of the SAC, and specifically denies it has committed acts

1 of infringement. To the extent Paragraph 251 of the SAC contains conclusions of law,  
2 no response is necessary.

3 252. Google denies the allegations and characterizations contained in  
4 Paragraph 252 of the SAC, and specifically denies it has committed acts of  
5 infringement. To the extent Paragraph 252 of the SAC contains conclusions of law,  
6 no response is necessary.

7 253. Google denies the allegations and characterizations contained in  
8 Paragraph 253 of the SAC, and specifically denies it has committed acts of  
9 infringement. To the extent Paragraph 253 of the SAC contains conclusions of law,  
10 no response is necessary.

11 254. Google is currently without knowledge or information sufficient to form  
12 a belief as to the truth or falsity of the allegations and characterizations contained in  
13 Paragraph 254 of the SAC, and therefore denies them. To the extent Paragraph 254  
14 of the SAC contains conclusions of law, no response is necessary.

15 255. Google denies the allegations and characterizations contained in  
16 Paragraph 255 of the SAC, and specifically denies it has committed acts of  
17 infringement. To the extent Paragraph 255 of the SAC contains conclusions of law,  
18 no response is necessary.

19 256. Google denies the allegations and characterizations contained in  
20 Paragraph 256 of the SAC, and specifically denies it has committed acts of  
21 infringement. To the extent Paragraph 256 of the SAC contains conclusions of law,  
22 no response is necessary.

23 257. Google denies the allegations and characterizations contained in  
24 Paragraph 257 of the SAC, and specifically denies it has committed acts of  
25 infringement. To the extent Paragraph 257 of the SAC contains conclusions of law,  
26 no response is necessary.

27 258. Google denies the allegations and characterizations contained in  
28 Paragraph 258 of the SAC, and specifically denies it has committed acts of

1 infringement. To the extent Paragraph 258 of the SAC contains conclusions of law,  
2 no response is necessary.

3 **COUNT II: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 8,588,949**

4 259. Google incorporates by reference each of its responses to Paragraphs 85-  
5 93 and 110-25 of the SAC set forth above as if fully set forth herein.

6 260. Google denies the allegations and characterizations contained in  
7 Paragraph 260 of the SAC, and specifically denies it has committed acts of  
8 infringement. To the extent Paragraph 260 of the SAC contains conclusions of law,  
9 no response is necessary.

10 261. Google denies the allegations and characterizations contained in  
11 Paragraph 261 of the SAC, including the footnotes to Paragraph 261, and specifically  
12 denies it has committed acts of infringement. To the extent Paragraph 261 of the SAC  
13 contains conclusions of law, no response is necessary.

14 262. Google admits that Exhibits 29, 34-39, and 55 purport to be printed  
15 copies of Google webpages. Google denies the remaining allegations and  
16 characterizations contained in Paragraph 262 of the SAC, and specifically denies it  
17 has committed acts of infringement. To the extent Paragraph 262 of the SAC contains  
18 conclusions of law, no response is necessary.

19 263. Google admits that Exhibits 29 and 84 purport to be printed copies of  
20 Google webpages. Google denies the remaining allegations and characterizations  
21 contained in Paragraph 263 of the SAC, and specifically denies it has committed acts  
22 of infringement. To the extent Paragraph 263 of the SAC contains conclusions of law,  
23 no response is necessary.

24 264. Google admits that Exhibits 29, 34-39, and 55 purport to be printed  
25 copies of Google webpages. Google denies the remaining allegations and  
26 characterizations contained in Paragraph 264 of the SAC, and specifically denies it  
27 has committed acts of infringement. To the extent Paragraph 264 of the SAC contains  
28 conclusions of law, no response is necessary.

1           265. Google admits that Exhibits 29, 84, and 85 purport to be printed copies  
2 of Google webpages. Google denies the remaining allegations and characterizations  
3 contained in Paragraph 265 of the SAC, and specifically denies it has committed acts  
4 of infringement. To the extent Paragraph 265 of the SAC contains conclusions of law,  
5 no response is necessary.

6           266. Google denies the allegations and characterizations contained in  
7 Paragraph 266 of the SAC, and specifically denies it has committed acts of  
8 infringement. To the extent Paragraph 266 of the SAC contains conclusions of law,  
9 no response is necessary.

10           267. Google denies the allegations and characterizations contained in  
11 Paragraph 267 of the SAC, and specifically denies it has committed acts of  
12 infringement. To the extent Paragraph 267 of the SAC contains conclusions of law,  
13 no response is necessary.

14           268. Google is currently without knowledge or information sufficient to form  
15 a belief as to the truth or falsity of the allegations and characterizations contained in  
16 Paragraph 268 of the SAC, and therefore denies them. To the extent Paragraph 268  
17 of the SAC contains conclusions of law, no response is necessary.

18           269. Google denies the allegations and characterizations contained in  
19 Paragraph 269 of the SAC, and specifically denies it has committed acts of  
20 infringement. To the extent Paragraph 269 of the SAC contains conclusions of law,  
21 no response is necessary.

22           270. Google denies the allegations and characterizations contained in  
23 Paragraph 270 of the SAC, and specifically denies it has committed acts of  
24 infringement. To the extent Paragraph 270 of the SAC contains conclusions of law,  
25 no response is necessary.

26           271. Google denies the allegations and characterizations contained in  
27 Paragraph 271 of the SAC, and specifically denies it has committed acts of  
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1 infringement. To the extent Paragraph 271 of the SAC contains conclusions of law,  
2 no response is necessary.

3 **COUNT III: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 9,195,258**

4 272. Google incorporates by reference each of its responses to Paragraphs 85-  
5 93 and 126-42 of the SAC set forth above as if fully set forth herein.

6 273. Google denies the allegations and characterizations contained in  
7 Paragraph 273 of the SAC, and specifically denies it has committed acts of  
8 infringement. To the extent Paragraph 273 of the SAC contains conclusions of law,  
9 no response is necessary.

10 274. Google denies the allegations and characterizations contained in  
11 Paragraph 274 of the SAC, and specifically denies it has committed acts of  
12 infringement. To the extent Paragraph 274 of the SAC contains conclusions of law,  
13 no response is necessary.

14 275. Google admits that Exhibits 20, 29, 60, and 61 purport to be printed  
15 copies of Google webpages. Google denies the remaining allegations and  
16 characterizations contained in Paragraph 275 of the SAC, and specifically denies it  
17 has committed acts of infringement. To the extent Paragraph 275 of the SAC contains  
18 conclusions of law, no response is necessary.

19 276. Google admits that Exhibits 20, 29, 60, 61, and 85 purport to be printed  
20 copies of Google webpages. Google denies the remaining allegations and  
21 characterizations contained in Paragraph 276 of the SAC, and specifically denies it  
22 has committed acts of infringement. To the extent Paragraph 276 of the SAC contains  
23 conclusions of law, no response is necessary.

24 277. Google denies the allegations and characterizations contained in  
25 Paragraph 277 of the SAC, and specifically denies it has committed acts of  
26 infringement. To the extent Paragraph 277 of the SAC contains conclusions of law,  
27 no response is necessary.

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1 278. Google denies the allegations and characterizations contained in  
2 Paragraph 278 of the SAC, and specifically denies it has committed acts of  
3 infringement. To the extent Paragraph 278 of the SAC contains conclusions of law,  
4 no response is necessary.

5 279. Google is currently without knowledge or information sufficient to form  
6 a belief as to the truth or falsity of the allegations and characterizations contained in  
7 Paragraph 279 of the SAC, and therefore denies them. To the extent Paragraph 279  
8 of the SAC contains conclusions of law, no response is necessary.

9 280. Google denies the allegations and characterizations contained in  
10 Paragraph 280 of the SAC, and specifically denies it has committed acts of  
11 infringement. To the extent Paragraph 280 of the SAC contains conclusions of law,  
12 no response is necessary.

13 281. Google denies the allegations and characterizations contained in  
14 Paragraph 281 of the SAC, and specifically denies it has committed acts of  
15 infringement. To the extent Paragraph 281 of the SAC contains conclusions of law,  
16 no response is necessary.

17 282. Google denies the allegations and characterizations contained in  
18 Paragraph 282 of the SAC, and specifically denies it has committed acts of  
19 infringement. To the extent Paragraph 282 of the SAC contains conclusions of law,  
20 no response is necessary.

21 **COUNT IV: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 9,219,959**

22 283. Google incorporates by reference each of its responses to 47-55 and 89-  
23 106 of the SAC set forth above as if fully set forth herein.

24 284. Google denies the allegations and characterizations contained in  
25 Paragraph 284 of the SAC, and specifically denies it has committed acts of  
26 infringement. To the extent Paragraph 284 of the SAC contains conclusions of law,  
27 no response is necessary.  
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1 285. Google denies the allegations and characterizations contained in  
2 Paragraph 285 of the SAC, and specifically denies it has committed acts of  
3 infringement. To the extent Paragraph 285 of the SAC contains conclusions of law,  
4 no response is necessary.

5 286. Google admits that Exhibits 67-70 and 132 purport to be printed copies  
6 of Google webpages. Google denies the remaining allegations and characterizations  
7 contained in Paragraph 286 of the SAC, and specifically denies it has committed acts  
8 of infringement. To the extent Paragraph 286 of the SAC contains conclusions of law,  
9 no response is necessary.

10 287. Google admits that Exhibits 67-70 and 85 purport to be printed copies of  
11 Google webpages. Google denies the remaining allegations and characterizations  
12 contained in Paragraph 287 of the SAC, and specifically denies it has committed acts  
13 of infringement. To the extent Paragraph 287 of the SAC contains conclusions of law,  
14 no response is necessary.

15 288. Google denies the allegations and characterizations contained in  
16 Paragraph 288 of the SAC, and specifically denies it has committed acts of  
17 infringement. To the extent Paragraph 288 of the SAC contains conclusions of law,  
18 no response is necessary.

19 289. Google denies the allegations and characterizations contained in  
20 Paragraph 289 of the SAC, and specifically denies it has committed acts of  
21 infringement. To the extent Paragraph 289 of the SAC contains conclusions of law,  
22 no response is necessary.

23 290. Google is currently without knowledge or information sufficient to form  
24 a belief as to the truth or falsity of the allegations and characterizations contained in  
25 Paragraph 290 of the SAC, and therefore denies them. To the extent Paragraph 290  
26 of the SAC contains conclusions of law, no response is necessary.

27 291. Google denies the allegations and characterizations contained in  
28 Paragraph 291 of the SAC, and specifically denies it has committed acts of

1 infringement. To the extent Paragraph 291 of the SAC contains conclusions of law,  
2 no response is necessary.

3 292. Google denies the allegations and characterizations contained in  
4 Paragraph 292 of the SAC, and specifically denies it has committed acts of  
5 infringement. To the extent Paragraph 292 of the SAC contains conclusions of law,  
6 no response is necessary.

7 293. Google denies the allegations and characterizations contained in  
8 Paragraph 293 of the SAC, and specifically denies it has committed acts of  
9 infringement. To the extent Paragraph 293 of the SAC contains conclusions of law,  
10 no response is necessary.

11 **COUNT V: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,031,715**

12 294. Google incorporates by reference each of its responses to 85-93 and 162-  
13 73 of the SAC set forth above as if fully set forth herein.

14 295. Google denies the allegations and characterizations contained in  
15 Paragraph 295 of the SAC, and specifically denies it has committed acts of  
16 infringement. To the extent Paragraph 295 of the SAC contains conclusions of law,  
17 no response is necessary.

18 296. Google denies the allegations and characterizations contained in  
19 Paragraph 296 of the SAC, and specifically denies it has committed acts of  
20 infringement. To the extent Paragraph 296 of the SAC contains conclusions of law,  
21 no response is necessary.

22 297. Google admits that Exhibits 20, 29, 60, and 61 purport to be printed  
23 copies of Google webpages. Google denies the remaining allegations and  
24 characterizations contained in Paragraph 297 of the SAC, and specifically denies it  
25 has committed acts of infringement. To the extent Paragraph 297 of the SAC contains  
26 conclusions of law, no response is necessary.

27 298. Google admits that Exhibits 20, 29, 60, 61, and 85 purport to be printed  
28 copies of Google webpages. Google denies the remaining allegations and

1 characterizations contained in Paragraph 298 of the SAC, and specifically denies it  
2 has committed acts of infringement. To the extent Paragraph 298 of the SAC contains  
3 conclusions of law, no response is necessary.

4 299. Google denies the allegations and characterizations contained in  
5 Paragraph 299 of the SAC, and specifically denies it has committed acts of  
6 infringement. To the extent Paragraph 299 of the SAC contains conclusions of law,  
7 no response is necessary.

8 300. Google denies the allegations and characterizations contained in  
9 Paragraph 300 of the SAC, and specifically denies it has committed acts of  
10 infringement. To the extent Paragraph 300 of the SAC contains conclusions of law,  
11 no response is necessary.

12 301. Google is currently without knowledge or information sufficient to form  
13 a belief as to the truth or falsity of the allegations and characterizations contained in  
14 Paragraph 301 of the SAC, and therefore denies them. To the extent Paragraph 301  
15 of the SAC contains conclusions of law, no response is necessary.

16 302. Google denies the allegations and characterizations contained in  
17 Paragraph 302 of the SAC, and specifically denies it has committed acts of  
18 infringement. To the extent Paragraph 302 of the SAC contains conclusions of law,  
19 no response is necessary.

20 303. Google denies the allegations and characterizations contained in  
21 Paragraph 303 of the SAC, and specifically denies it has committed acts of  
22 infringement. To the extent Paragraph 303 of the SAC contains conclusions of law,  
23 no response is necessary.

24 304. Google denies the allegations and characterizations contained in  
25 Paragraph 304 of the SAC, and specifically denies it has committed acts of  
26 infringement. To the extent Paragraph 304 of the SAC contains conclusions of law,  
27 no response is necessary.  
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1 305. Google denies the allegations and characterizations contained in  
2 Paragraph 305 of the SAC, and specifically denies it has committed acts of  
3 infringement. To the extent Paragraph 305 of the SAC contains conclusions of law,  
4 no response is necessary.

5 **COUNT VI: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,209,953**

6 306. Google incorporates by reference each of its responses to Paragraphs 85-  
7 93 and 174-86 of the SAC set forth above as if fully set forth herein.

8 307. Google denies the allegations and characterizations contained in  
9 Paragraph 307 of the SAC, and specifically denies it has committed acts of  
10 infringement. To the extent Paragraph 307 of the SAC contains conclusions of law,  
11 no response is necessary.

12 308. Google denies the allegations and characterizations contained in  
13 Paragraph 308 of the SAC, and specifically denies it has committed acts of  
14 infringement. To the extent Paragraph 308 of the SAC contains conclusions of law,  
15 no response is necessary.

16 309. Google admits that Exhibits 20, 29, 60, and 61 purport to be printed  
17 copies of Google webpages. Google denies the remaining allegations and  
18 characterizations contained in Paragraph 309 of the SAC, and specifically denies it  
19 has committed acts of infringement. To the extent Paragraph 309 of the SAC contains  
20 conclusions of law, no response is necessary.

21 310. Google admits that Exhibits 20, 29, 60, 61, and 85 purport to be printed  
22 copies of Google webpages. Google denies the remaining allegations and  
23 characterizations contained in Paragraph 310 of the SAC, and specifically denies it  
24 has committed acts of infringement. To the extent Paragraph 310 of the SAC contains  
25 conclusions of law, no response is necessary.

26 311. Google denies the allegations and characterizations contained in  
27 Paragraph 311 of the SAC, and specifically denies it has committed acts of  
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1 infringement. To the extent Paragraph 311 of the SAC contains conclusions of law,  
2 no response is necessary.

3 312. Google denies the allegations and characterizations contained in  
4 Paragraph 312 of the SAC, and specifically denies it has committed acts of  
5 infringement. To the extent Paragraph 312 of the SAC contains conclusions of law,  
6 no response is necessary.

7 313. Google is currently without knowledge or information sufficient to form  
8 a belief as to the truth or falsity of the allegations and characterizations contained in  
9 Paragraph 313 of the SAC, and therefore denies them. To the extent Paragraph 313  
10 of the SAC contains conclusions of law, no response is necessary.

11 314. Google denies the allegations and characterizations contained in  
12 Paragraph 314 of the SAC, and specifically denies it has committed acts of  
13 infringement. To the extent Paragraph 314 of the SAC contains conclusions of law,  
14 no response is necessary.

15 315. Google denies the allegations and characterizations contained in  
16 Paragraph 315 of the SAC, and specifically denies it has committed acts of  
17 infringement. To the extent Paragraph 315 of the SAC contains conclusions of law,  
18 no response is necessary.

19 316. Google denies the allegations and characterizations contained in  
20 Paragraph 316 of the SAC, and specifically denies it has committed acts of  
21 infringement. To the extent Paragraph 316 of the SAC contains conclusions of law,  
22 no response is necessary.

23 **COUNT VII: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,439,896**

24 317. Google incorporates by reference each of its responses to Paragraphs 85-  
25 93 and 187-204 of the SAC set forth above as if fully set forth herein.

26 318. Google denies the allegations and characterizations contained in  
27 Paragraph 318 of the SAC, and specifically denies it has committed acts of  
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1 infringement. To the extent Paragraph 318 of the SAC contains conclusions of law,  
2 no response is necessary.

3 319. Google denies the allegations and characterizations contained in  
4 Paragraph 319 of the SAC, and specifically denies it has committed acts of  
5 infringement. To the extent Paragraph 319 of the SAC contains conclusions of law,  
6 no response is necessary.

7 320. Google admits that Exhibits 34, 35, 79, and 80 purport to be printed  
8 copies of Google webpages. Google denies the remaining allegations and  
9 characterizations contained in Paragraph 320 of the SAC, and specifically denies it  
10 has committed acts of infringement. To the extent Paragraph 320 of the SAC contains  
11 conclusions of law, no response is necessary.

12 321. Google admits that Exhibits 34, 35, 79, and 80 purport to be printed  
13 copies of Google webpages. Google denies the remaining allegations and  
14 characterizations contained in Paragraph 321 of the SAC, and specifically denies it  
15 has committed acts of infringement. To the extent Paragraph 321 of the SAC contains  
16 conclusions of law, no response is necessary.

17 322. Google denies the allegations and characterizations contained in  
18 Paragraph 322 of the SAC, and specifically denies it has committed acts of  
19 infringement. To the extent Paragraph 322 of the SAC contains conclusions of law,  
20 no response is necessary.

21 323. Google denies the allegations and characterizations contained in  
22 Paragraph 323 of the SAC, and specifically denies it has committed acts of  
23 infringement. To the extent Paragraph 323 of the SAC contains conclusions of law,  
24 no response is necessary.

25 324. Google is currently without knowledge or information sufficient to form  
26 a belief as to the truth or falsity of the allegations and characterizations contained in  
27 Paragraph 324 of the SAC, and therefore denies them. To the extent Paragraph 324  
28 of the SAC contains conclusions of law, no response is necessary.

1 325. Google denies the allegations and characterizations contained in  
2 Paragraph 325 of the SAC, and specifically denies it has committed acts of  
3 infringement. To the extent Paragraph 325 of the SAC contains conclusions of law,  
4 no response is necessary.

5 326. Google denies the allegations and characterizations contained in  
6 Paragraph 326 of the SAC, and specifically denies it has committed acts of  
7 infringement. To the extent Paragraph 326 of the SAC contains conclusions of law,  
8 no response is necessary.

9 327. Google denies the allegations and characterizations contained in  
10 Paragraph 327 of the SAC, and specifically denies it has committed acts of  
11 infringement. To the extent Paragraph 327 of the SAC contains conclusions of law,  
12 no response is necessary.

13 328. Google denies the allegations and characterizations contained in  
14 Paragraph 328 of the SAC, and specifically denies it has committed acts of  
15 infringement. To the extent Paragraph 328 of the SAC contains conclusions of law,  
16 no response is necessary.

17 **COUNT VIII: ALLEGED INFRINGEMENT OF U.S. PATENT NO.**

18 **11,080,001**

19 329. Google incorporates by reference each of its responses to 85-93 and 205-  
20 220 of the SAC set forth above as if fully set forth herein.

21 330. Google denies the allegations and characterizations contained in  
22 Paragraph 330 of the SAC, and specifically denies it has committed acts of  
23 infringement. To the extent Paragraph 330 of the SAC contains conclusions of law,  
24 no response is necessary.

25 331. Google denies the allegations and characterizations contained in  
26 Paragraph 331 of the SAC, and specifically denies it has committed acts of  
27 infringement. To the extent Paragraph 331 of the SAC contains conclusions of law,  
28 no response is necessary.

1 332. Google admits that Exhibits 20, 29, 60, and 61 purport to be printed  
2 copies of Google webpages. Google denies the remaining allegations and  
3 characterizations contained in Paragraph 332 of the SAC, and specifically denies it  
4 has committed acts of infringement. To the extent Paragraph 332 of the SAC contains  
5 conclusions of law, no response is necessary.

6 333. Google admits that Exhibits 20, 29, 60, 61, and 85 purport to be printed  
7 copies of Google webpages. Google denies the remaining allegations and  
8 characterizations contained in Paragraph 333 of the SAC, and specifically denies it  
9 has committed acts of infringement. To the extent Paragraph 333 of the SAC contains  
10 conclusions of law, no response is necessary.

11 334. Google denies the allegations and characterizations contained in  
12 Paragraph 334 of the SAC, and specifically denies it has committed acts of  
13 infringement. To the extent Paragraph 334 of the SAC contains conclusions of law,  
14 no response is necessary.

15 335. Google denies the allegations and characterizations contained in  
16 Paragraph 335 of the SAC, and specifically denies it has committed acts of  
17 infringement. To the extent Paragraph 335 of the SAC contains conclusions of law,  
18 no response is necessary.

19 336. Google is currently without knowledge or information sufficient to form  
20 a belief as to the truth or falsity of the allegations and characterizations contained in  
21 Paragraph 336 of the SAC, and therefore denies them. To the extent Paragraph 336  
22 of the SAC contains conclusions of law, no response is necessary.

23 337. Google denies the allegations and characterizations contained in  
24 Paragraph 337 of the SAC, and specifically denies it has committed acts of  
25 infringement. To the extent Paragraph 337 of the SAC contains conclusions of law,  
26 no response is necessary.

27 338. Google denies the allegations and characterizations contained in  
28 Paragraph 338 of the SAC, and specifically denies it has committed acts of

1 infringement. To the extent Paragraph 338 of the SAC contains conclusions of law,  
2 no response is necessary.

3 339. Google denies the allegations and characterizations contained in  
4 Paragraph 339 of the SAC, and specifically denies it has committed acts of  
5 infringement. To the extent Paragraph 339 of the SAC contains conclusions of law,  
6 no response is necessary.

7 340. Google denies the allegations and characterizations contained in  
8 Paragraph 339 of the SAC, and specifically denies it has committed acts of  
9 infringement. To the extent Paragraph 339 of the SAC contains conclusions of law,  
10 no response is necessary.

11 **COUNT IX: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,966,025**

12 341. Google incorporates by reference each of its responses to 85-93 and 221-  
13 232 of the SAC set forth above as if fully set forth herein.

14 342. Google denies the allegations and characterizations contained in  
15 Paragraph 342 of the SAC, and specifically denies it has committed acts of  
16 infringement. To the extent Paragraph 342 of the SAC contains conclusions of law,  
17 no response is necessary.

18 343. Google denies the allegations and characterizations contained in  
19 Paragraph 343 of the SAC, and specifically denies it has committed acts of  
20 infringement. To the extent Paragraph 343 of the SAC contains conclusions of law,  
21 no response is necessary.

22 344. Google admits that Exhibits 67-70 and 132 purport to be printed copies  
23 of Google webpages. Google denies the remaining allegations and characterizations  
24 contained in Paragraph 344 of the SAC, and specifically denies it has committed acts  
25 of infringement. To the extent Paragraph 344 of the SAC contains conclusions of law,  
26 no response is necessary.

27 345. Google admits that Exhibits 67-70, 85, and 132 purport to be printed  
28 copies of Google webpages. Google denies the remaining allegations and

1 characterizations contained in Paragraph 345 of the SAC, and specifically denies it  
2 has committed acts of infringement. To the extent Paragraph 345 of the SAC contains  
3 conclusions of law, no response is necessary.

4 346. Google denies the allegations and characterizations contained in  
5 Paragraph 346 of the SAC, and specifically denies it has committed acts of  
6 infringement. To the extent Paragraph 346 of the SAC contains conclusions of law,  
7 no response is necessary.

8 347. Google denies the allegations and characterizations contained in  
9 Paragraph 347 of the SAC, and specifically denies it has committed acts of  
10 infringement. To the extent Paragraph 347 of the SAC contains conclusions of law,  
11 no response is necessary.

12 348. Google is currently without knowledge or information sufficient to form  
13 a belief as to the truth or falsity of the allegations and characterizations contained in  
14 Paragraph 348 of the SAC, and therefore denies them. To the extent Paragraph 348  
15 of the SAC contains conclusions of law, no response is necessary.

16 349. Google denies the allegations and characterizations contained in  
17 Paragraph 349 of the SAC, and specifically denies it has committed acts of  
18 infringement. To the extent Paragraph 349 of the SAC contains conclusions of law,  
19 no response is necessary.

20 350. Google denies the allegations and characterizations contained in  
21 Paragraph 350 of the SAC, and specifically denies it has committed acts of  
22 infringement. To the extent Paragraph 350 of the SAC contains conclusions of law,  
23 no response is necessary.

24 351. Google denies the allegations and characterizations contained in  
25 Paragraph 351 of the SAC, and specifically denies it has committed acts of  
26 infringement. To the extent Paragraph 351 of the SAC contains conclusions of law,  
27 no response is necessary.  
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1 352. Google denies the allegations and characterizations contained in  
2 Paragraph 352 of the SAC, and specifically denies it has committed acts of  
3 infringement. To the extent Paragraph 352 of the SAC contains conclusions of law,  
4 no response is necessary.

5 **COUNT X: ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,541,883**

6 353. Google incorporates by reference each of its responses to 85-93 and 233-  
7 244 of the SAC set forth above as if fully set forth herein.

8 354. Google denies the allegations and characterizations contained in  
9 Paragraph 354 of the SAC, and specifically denies it has committed acts of  
10 infringement. To the extent Paragraph 354 of the SAC contains conclusions of law,  
11 no response is necessary.

12 355. Google denies the allegations and characterizations contained in  
13 Paragraph 355 of the SAC, and specifically denies it has committed acts of  
14 infringement. To the extent Paragraph 355 of the SAC contains conclusions of law,  
15 no response is necessary.

16 356. Google admits that Exhibits 34, 35, 79, 80, 101, 135, and 136 purport to  
17 be printed copies of Google webpages. Google denies the remaining allegations and  
18 characterizations contained in Paragraph 356 of the SAC, and specifically denies it  
19 has committed acts of infringement. To the extent Paragraph 356 of the SAC contains  
20 conclusions of law, no response is necessary.

21 357. Google admits that Exhibits 34, 35, 79, 80, 85, 101, 135, and 136 purport  
22 to be printed copies of Google webpages. Google denies the remaining allegations  
23 and characterizations contained in Paragraph 357 of the SAC, and specifically denies  
24 it has committed acts of infringement. To the extent Paragraph 357 of the SAC  
25 contains conclusions of law, no response is necessary.

26 358. Google denies the allegations and characterizations contained in  
27 Paragraph 358 of the SAC, and specifically denies it has committed acts of  
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1 infringement. To the extent Paragraph 358 of the SAC contains conclusions of law,  
2 no response is necessary.

3 359. Google denies the allegations and characterizations contained in  
4 Paragraph 359 of the SAC, and specifically denies it has committed acts of  
5 infringement. To the extent Paragraph 359 of the SAC contains conclusions of law,  
6 no response is necessary.

7 360. Google is currently without knowledge or information sufficient to form  
8 a belief as to the truth or falsity of the allegations and characterizations contained in  
9 Paragraph 360 of the SAC, and therefore denies them. To the extent Paragraph 360  
10 of the SAC contains conclusions of law, no response is necessary.

11 361. Google denies the allegations and characterizations contained in  
12 Paragraph 361 of the SAC, and specifically denies it has committed acts of  
13 infringement. To the extent Paragraph 361 of the SAC contains conclusions of law,  
14 no response is necessary.

15 362. Google denies the allegations and characterizations contained in  
16 Paragraph 362 of the SAC, and specifically denies it has committed acts of  
17 infringement. To the extent Paragraph 362 of the SAC contains conclusions of law,  
18 no response is necessary.

19 363. Google denies the allegations and characterizations contained in  
20 Paragraph 363 of the SAC, and specifically denies it has committed acts of  
21 infringement. To the extent Paragraph 363 of the SAC contains conclusions of law,  
22 no response is necessary.

23 364. Google denies the allegations and characterizations contained in  
24 Paragraph 364 of the SAC, and specifically denies it has committed acts of  
25 infringement. To the extent Paragraph 364 of the SAC contains conclusions of law,  
26 no response is necessary.

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**RESPONSE TO PRAYER FOR RELIEF**

Google denies that Sonos is entitled to any of the relief requested or any other relief.

365. Paragraph 365 does not contain any factual allegations, and therefore, does not require a response. To the extent it contains allegations requiring a response, Google denies them.

366. Paragraph 366 does not contain any factual allegations, and therefore, does not require a response. To the extent it contains allegations requiring a response, Google denies them, including specifically denying that Google has infringed, willful or not, any of Sonos’s patent rights and that Sonos is entitled to any of the relief requested or any other relief.

367. Paragraph 367 does not contain any factual allegations, and therefore, does not require a response. To the extent it contains allegations requiring a response, Google denies them, including specifically denying that Google has infringed, willful or not, any of Sonos’s patent rights and that Sonos is entitled to any of the relief requested or any other relief.

368. Paragraph 368 does not contain any factual allegations, and therefore, does not require a response. To the extent it contains allegations requiring a response, Google denies them, including specifically denying that Google has infringed, willful or not, any of Sonos’s patent rights and that Sonos is entitled to any of the relief requested or any other relief.

369. Paragraph 369 does not contain any factual allegations, and therefore, does not require a response. To the extent it contains allegations requiring a response, Google denies them, including specifically denying that Google has infringed, willful or not, any of Sonos’s patent rights and that Sonos is entitled to any of the relief requested or any other relief.

370. Paragraph 370 does not contain any factual allegations, and therefore, does not require a response. To the extent it contains allegations requiring a response,

1 Google denies them, including specifically denying that Google has infringed, willful  
2 or not, any of Sonos’s patent rights and that Sonos is entitled to any of the relief  
3 requested or any other relief.

4 371. Paragraph 371 does not contain any factual allegations, and therefore,  
5 does not require a response. To the extent it contains allegations requiring a response,  
6 Google denies them, including specifically denying that Google has infringed, willful  
7 or not, any of Sonos’s patent rights and that Sonos is entitled to any of the relief  
8 requested or any other relief.

9 372. Paragraph 372 does not contain any factual allegations, and therefore,  
10 does not require a response. To the extent it contains allegations requiring a response,  
11 Google denies them, including specifically denying that Google has infringed, willful  
12 or not, any of Sonos’s patent rights and that Sonos is entitled to any of the relief  
13 requested or any other relief.

14 **DEFENSES TO SECOND AMENDED COMPLAINT**

15 Subject to the responses above, Google alleges and asserts the following  
16 defenses in response to the allegations, undertaking the burden of proof only as to  
17 those defenses deemed affirmative defenses by law, regardless of how such defenses  
18 are denominated herein. In addition to the affirmative defenses described below,  
19 subject to its responses above, Google specifically reserves all rights to allege  
20 additional affirmative defenses that become known through the course of discovery:

21 **FIRST DEFENSE – NON-INFRINGEMENT**

22 Google does not infringe and has not infringed (either directly, contributorily,  
23 or by inducement), either literally or under the doctrine of equivalents, and is not  
24 liable for infringement of any valid and enforceable claim of the ’014, ’949, ’258,  
25 ’959, ’715, ’953, ’896, ’001, ’025, and ’883 (“asserted patents”).

26 **SECOND DEFENSE – INVALIDITY**

27 Each asserted claim of the asserted patents is invalid for failure to comply with  
28 one or more of the requirements of United States Code, Title 35, including without

1 limitation, 35 U.S.C. §§ 101, 102, 103, and/or 112, the non-statutory doctrine of  
2 double patenting, improper inventorship, and the rules, regulations, and laws  
3 pertaining thereto.

4 **THIRD DEFENSE – UNENFORCEABILITY**

5 On information and belief, Sonos is not entitled to any relief against Google in  
6 this action because the asserted patents are unenforceable.

7 **FOURTH DEFENSE – PATENT EXHAUSTION AND/OR LICENSE**

8 On information and belief, Sonos’s claims against Google are barred as a result  
9 of patent exhaustion and/or a license to the asserted patents.

10 **FIFTH DEFENSE – IMPLIED LICENSE**

11 On information and belief, Sonos’s claims against Google are barred by the  
12 doctrine of implied license.

13 **SIXTH DEFENSE – LACK OF STANDING**

14 On information and belief, Sonos’s claims against Google are barred because  
15 Sonos lacks standing to assert the asserted patents.

16 **SEVENTH DEFENSE – EQUITABLE ESTOPPEL**

17 On information and belief, Sonos’s claims against Google are barred by the  
18 doctrine of equitable estoppel.

19 **EIGHT DEFENSE – WAIVER**

20 On information and belief, Sonos’s claims against Google are barred by the  
21 doctrine of waiver.

22 **NINTH DEFENSE – PROSECUTION HISTORY ESTOPPEL**

23 On information and belief, due to admissions and statements made to the  
24 United States Patent and Trademark Office during the prosecution of the applications  
25 that resulted in the asserted patents or related patent applications, Sonos is estopped  
26 from construing a valid and enforceable claim, if any, of the asserted patents as  
27 infringed literally or under the doctrine of equivalents by the accused products.  
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**TENTH DEFENSE – UNCLEAN HANDS**

On information and belief, Sonos’s claims against Google are barred by the doctrine of unclean hands.

**ELEVENTH DEFENSE – LIMITATION ON PATENT DAMAGES**

On information and belief, Sonos’s claims for damages, if any, against Google for alleged infringement of the asserted patents are limited by 35 U.S.C. §§ 286, 287 and/or 288.

**TWELFTH DEFENSE – ENSNAREMENT**

On information and belief, Sonos’s claims for infringement against Google are barred by the doctrine of ensnarement.

**THIRTEENTH DEFENSE – SUBSTANTIAL NON-INFRINGEMENT USE**

Any and all accused instrumentalities have substantial uses that do not infringe and do not induce or contribute to the alleged infringement of the claims of the asserted patents.

**FOURTEENTH DEFENSE – OTHER DEFENSES**

Google reserves the right to amend its Answer to include other additional defenses that Google may learn of during the course of this litigation.

**RESERVATION OF RIGHTS**

Google hereby reserves the right to amend its Answer and reserves any and all additional defenses available to it under Title 35, U.S.C., or the rules, regulations, and laws related thereto, the Federal Rules of Civil Procedure including any defenses set out in Rule 8(c), the Rules of this Court, or otherwise in law or equity, now existing or later arising, as may be discovered or become applicable throughout discovery or otherwise in the course of litigation.

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1 Sonos Roam, Sonos Roam SL, Sonos Five, Sonos Arc, Sonos Beam, Sonos Ray,  
2 Sonos Era 100, Sonos Era 300, Sonos Ace, Sonos Arc Ultra, Sonos Sub 4, Sonos Sub  
3 Mini, Sonos Sub, and Sonos Port.

4 7. Sonos is thus actively infringing Google’s intellectual property. Sonos  
5 has no license to use Google’s patents. Because Sonos refuses to cease its  
6 infringement, and is unwilling to recognize the value of Google’s technology through  
7 a license, Google has filed these counterclaims to protect its intellectual property.

8 **THE PARTIES**

9 8. Plaintiff Google LLC is a subsidiary of Alphabet Inc. with its principal  
10 place of business located in Mountain View, California 94043.

11 9. Defendant Sonos, Inc. is a Delaware corporation with headquarters at  
12 614 Chapala Street, Santa Barbara, California 93101.

13 **JURISDICTION AND VENUE**

14 10. This is a civil action for patent infringement arising under the patent laws  
15 of the United States, Title 35 of the United States Code. This Court has exclusive  
16 subject matter jurisdiction over this Complaint pursuant to 28 U.S.C. Sections 1331  
17 and 1338(a).

18 11. This Court has personal jurisdiction over Sonos in this action at least  
19 because Sonos submitted to the jurisdiction of this Court when it filed its SAC in this  
20 District, because Sonos maintains its headquarters in this District, and because Sonos  
21 has committed acts of patent infringement and has regularly and systematically  
22 conducted and solicited business in this District by and through at least its  
23 headquarters in this District.

24 12. Venue is proper in this District under 28 U.S.C. § 1400(b) at least  
25 because Sonos has committed acts of infringement in this District and has regular and  
26 established places of business in this District, specifically its headquarters at 614  
27 Chapala Street, Santa Barbara, California 93101.

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**FIRST CAUSE OF ACTION**

**(Infringement of Patent No. 12,132,608)**

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13. Google incorporates all of the above paragraphs as though fully set forth herein.

14. U.S. Patent No. 12,132,608, titled “Apparatus and Method for Seamless Commissioning of Wireless Devices,” was duly and lawfully issued by the United States Patent and Trademark Office on October 29, 2024. A true and correct copy of the ’608 patent is attached to this Complaint as Exhibit 1.

15. Google is the owner by assignment of all rights, title, and interest in the ’608 patent, including the right to bring this suit for past and future damages and/or injunctive relief.

16. The ’608 patent is valid and enforceable.

17. Sonos infringes one or more claims of the ’608 patent, including but not limited to claim 1 (the “Asserted ’608 Claims”), directly and/or indirectly via induced infringement and/or by contributory infringement. Sonos infringes the Asserted ’608 Claims by making, using, importing, selling for importation, and/or selling after importation into the United States at least the Sonos One, Sonos One SL, Sonos Move, Sonos Move 2, Sonos Roam 2, Sonos Roam, Sonos Roam SL, Sonos Five, Sonos Arc, Sonos Beam, Sonos Ray, Sonos Era 100, Sonos Era 300, Sonos Ace, Sonos Arc Ultra, Sonos Sub 4, Sonos Sub Mini, Sonos Sub, and Sonos Port products (the “Accused ’608 Products”) in violation of 35 U.S.C. Sections 271(a)-(b). On information and belief, the Accused ’608 Products satisfy all claim limitations of the Asserted ’608 Claims at the time of their importation into and/or sale in the United States.

18. Sonos had actual knowledge of the ’608 patent or was willfully blind to its existence at least no later than the filing of this First Amended Answer and Counterclaims.

19. Sonos directly infringes the Asserted ’608 Claims by making, using, offering to sell, or selling the Accused ’608 Products in the United States and by

1 importing the Accused '608 Products into the United States in violation of 35 U.S.C.  
2 Section 271(a). For example, as shown in Exhibit 2, which is incorporated herein by  
3 reference, the Accused '608 Products practice each and every limitation of at least  
4 claim 1 of the '608 patent.

5       20. Sonos actively, knowingly, and intentionally induces the infringement of  
6 the Asserted '608 Claims by actively encouraging others to make, use, offer to sell,  
7 or sell the Accused '608 Products in the United States and/or import the Accused '608  
8 Products into the United States in violation of 35 U.S.C. Section 271(b). Sonos knows  
9 (or should know) that its actions will induce users of the Accused '608 Products to  
10 directly infringe the Asserted '608 Claims. Those users then directly infringe the  
11 Asserted '608 Claims.

12       21. For example, Sonos promotes and advertises the use of the Accused '608  
13 Products, including the Sonos One, Sonos One SL, Sonos Move, Sonos Move 2,  
14 Sonos Roam 2, Sonos Roam, Sonos Roam SL, Sonos Five, Sonos Arc, Sonos Beam,  
15 Sonos Ray, Sonos Era 100, Sonos Era 300, Sonos Ace, Sonos Arc Ultra, Sonos Sub  
16 4, Sonos Sub Mini, Sonos Sub, and Sonos Port, on its website  
17 (<https://www.sonos.com/en-us/home>, a true and correct copy of which is attached as  
18 Exhibit 3) and in other promotional materials like user manuals and user guides.  
19 Sonos advertises and instructs its customers and potential customers to purchase and  
20 set up one or more of the Accused '608 Products in a manner that directly infringes  
21 the Asserted '608 Claims by “[c]onnect[ing]” a product “to WiFi wirelessly.”  
22 (<https://www.sonos.com/en-us/how-sonos-works>, a true and correct copy of which is  
23 attached as Exhibit 4). Google further incorporates by reference the material posted  
24 by Sonos on its website and cited in Exhibit 2, which further demonstrates Sonos’  
25 instructions to its customers and potential customers to connect the Accused '608  
26 Products to their home WLAN. By instructing its customers and potential customers  
27 to connect the Accused '608 Products to their home WLAN, Sonos induces its  
28 customers and potential customers to use at least the invention of claim 1 of the '608

1 Patent. Based on Sonos' instructions, users of the Accused '608 Products directly  
2 infringe the asserted '608 patent.

3 22. Sonos contributorily infringes the Asserted '608 Claims by offering to  
4 sell or selling within the United States or importing into the United States the Accused  
5 '608 Products (where each of the Accused '608 Products is or contains a component  
6 of a patented machine, manufacture, combination or composition, or a material or  
7 apparatus for use in practicing a patented process, constituting a material part of the  
8 invention), knowing the same to be especially made or especially adapted for use in  
9 infringing the '608 patent, and not a staple article or commodity of commerce suitable  
10 for substantial noninfringing use in violation of 35 U.S.C. Section 271(c).

11 23. Sonos' infringement of the '608 patent has been willful and deliberate  
12 because it knew or should have known about the '608 patent and the infringement of  
13 that patent at least as early as filing of this First Amended Answer and Counterclaims  
14 but acted despite an objectively high likelihood that such acts would result in  
15 infringement of the patent.

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

22 **SECOND CAUSE OF ACTION**

23 **(Infringement of Patent No. 9,485,790)**

24 25. Google incorporates all of the above paragraphs as though fully set forth  
25 herein.

26 26. U.S. Patent No. 9,485,790, titled "Apparatus and Method for Seamless  
27 Commissioning of Wireless Devices," was duly and lawfully issued by the United  
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1 States Patent and Trademark Office on November 1, 2016. A true and correct copy  
2 of the '790 patent is attached to this Complaint as Exhibit 5.

3 27. Google is the owner by assignment of all rights, title, and interest in the  
4 '790 patent, including the right to bring this suit for past and future damages and/or  
5 injunctive relief.

6 28. The '790 patent is valid and enforceable.

7 29. Sonos infringes one or more claims of the '790 patent, including but not  
8 limited to claim 1 (the "Asserted '790 Claims"), directly and/or indirectly via induced  
9 infringement and/or by contributory infringement. Sonos infringes the Asserted '790  
10 Claims by making, using, importing, selling for importation, and/or selling after  
11 importation into the United States at least the Sonos One, Sonos One SL, Sonos Move,  
12 Sonos Move 2, Sonos Roam 2, Sonos Roam, Sonos Roam SL, Sonos Five, Sonos Arc,  
13 Sonos Beam, Sonos Ray, Sonos Era 100, Sonos Era 300, Sonos Ace, Sonos Arc Ultra,  
14 Sonos Sub 4, Sonos Sub Mini, Sonos Sub, and Sonos Port products (the "Accused  
15 '790 Products") in violation of 35 U.S.C. Sections 271(a)-(b). On information and  
16 belief, the Accused '790 Products satisfy all claim limitations of the Asserted '790  
17 Claims at the time of their importation into and/or sale in the United States.

18 30. Sonos had actual knowledge of the '790 patent or was willfully blind to  
19 its existence at least no later than the filing of this First Amended Answer and  
20 Counterclaims.

21 31. Sonos directly infringes the Asserted '790 Claims by making, using,  
22 offering to sell, or selling the Accused '790 Products in the United States and by  
23 importing the Accused '790 Products into the United States in violation of 35 U.S.C.  
24 Section 271(a). For example, as shown in Exhibit 6, which is incorporated herein by  
25 reference, the Accused '790 Products practice each and every limitation of at least  
26 claim 1 of the '790 patent.

27 32. Sonos actively, knowingly, and intentionally induces the infringement of  
28 the Asserted '790 Claims by actively encouraging others to make, use, offer to sell,

1 or sell the Accused '790 Products in the United States and/or import the Accused '790  
2 Products into the United States in violation of 35 U.S.C. Section 271(b). Sonos knows  
3 (or should know) that its actions will induce users of the Accused '790 Products to  
4 directly infringe the Asserted '790 Claims. Those users then directly infringe the  
5 Asserted '790 Claims.

6 33. For example, Sonos promotes and advertises the use of the Accused '790  
7 Products, including the Sonos One, Sonos One SL, Sonos Move, Sonos Move 2,  
8 Sonos Roam 2, Sonos Roam, Sonos Roam SL, Sonos Five, Sonos Arc, Sonos Beam,  
9 Sonos Ray, Sonos Era 100, Sonos Era 300, Sonos Ace, Sonos Arc Ultra, Sonos Sub  
10 4, Sonos Sub Mini, Sonos Sub, and Sonos Port, on its website  
11 (<https://www.sonos.com/en-us/home>, a true and correct copy of which is attached as  
12 Exhibit 3) and in other promotional materials like user manuals and user guides.  
13 Sonos advertises and instructs its customers and potential customers to purchase and  
14 set up one or more of the Accused '790 Products in a manner that directly infringes  
15 the Asserted '790 Claims by “[c]onnect[ing]” a product “to WiFi wirelessly.”  
16 (<https://www.sonos.com/en-us/how-sonos-works>, a true and correct copy of which is  
17 attached as Exhibit 4). Google further incorporates by reference the material posted  
18 by Sonos on its website and cited in Exhibit 6, which further demonstrates Sonos’  
19 instructions to its customers and potential customers to connect the Accused '790  
20 Products to their home WLAN. By instructing its customers and potential customers  
21 to connect the Accused '790 Products to their home WLAN, Sonos induces its  
22 customers and potential customers to use at least the invention of claim 1 of the '790  
23 Patent. Based on Sonos’ instructions, users of the Accused '790 Products directly  
24 infringe the asserted '790 patent.

25 34. Sonos contributorily infringes the Asserted '790 Claims by offering to  
26 sell or selling within the United States or importing into the United States the Accused  
27 '790 Products (where each of the Accused '790 Products is or contains a component  
28 of a patented machine, manufacture, combination or composition, or a material or

1 apparatus for use in practicing a patented process, constituting a material part of the  
2 invention), knowing the same to be especially made or especially adapted for use in  
3 infringing the '790 patent, and not a staple article or commodity of commerce suitable  
4 for substantial noninfringing use in violation of 35 U.S.C. Section 271(c).

5 35. Sonos' infringement of the '790 patent has been willful and deliberate  
6 because it knew or should have known about the '790 patent and the infringement of  
7 that patent at least as early as filing of this First Amended Answer and Counterclaims  
8 but acted despite an objectively high likelihood that such acts would result in  
9 infringement of the patent.

10 36. As the direct and proximate result of Sonos' conduct, Google has  
11 suffered and, if Sonos' conduct is not stopped, will continue to suffer, competitive  
12 harm, irreparable injury, and damages in an amount to be proven at trial. Because  
13 Google's remedy at law is inadequate, Google seeks, in addition to damages,  
14 permanent injunctive relief. Google's business operates in a competitive market and  
15 will continue suffering irreparable harm absent injunctive relief.

16 **PRAYER FOR RELIEF**

17 WHEREFORE, Google respectfully requests that this Court enter judgement  
18 in its favor and against Sonos as follows:

19 A. Dismissing Sonos' Second Amended Complaint in its entirety and with  
20 prejudice;

21 B. Denying all relief that Sonos seeks in its Second Amended Complaint;

22 C. Declaring that Google has not infringed, and is not infringing, any of the  
23 patents asserted in the Second Amended Complaint;

24 D. Declaring that the claims of each of the patents asserted in the Second  
25 Amended Complaint are invalid, unpatentable and/or unenforceable against Google;

26 E. That Judgment be entered that Sonos has infringed one or more of the  
27 '608 and '790 patents, directly and/or indirectly, by way of inducement or  
28 contributory infringement, literally or under the doctrine of equivalents;

1 F. That, in accordance with 35 U.S.C. § 283, Sonos and all affiliates,  
2 employees, agents, officers, directors, attorneys, successors, and assigns and all those  
3 acting on behalf of or in active concert or participation with any of them, including  
4 partners, distributors, resellers and customers, be preliminarily and permanently  
5 enjoined from (1) infringing the '608 and '790 patents and (2) making, using, selling,  
6 offering for sale and/or importing any products and/or services that infringe the '608  
7 and '790 patents;

8 G. An award of damages sufficient to compensate Google for Sonos'  
9 infringement under 35 U.S.C. § 284;

10 H. A judgment holding Sonos' infringement of the '608 and '790 patents to  
11 be willful, and a trebling of damages pursuant to 35 U.S.C. § 284.

12 I. That the case be found exceptional under 35 U.S.C. § 285 and that  
13 Google be awarded its attorneys' fees;

14 J. Costs and expenses in this action;

15 K. An award of prejudgment and post-judgment interest;

16 L. Finding this case to be exceptional under 35 U.S.C. § 285 and awarding  
17 Google all reasonable costs, experts' fees, and attorneys' fees; and

18 M. Awarding any other relief that the Court deems just and equitable.

19 **DEMAND FOR JURY TRIAL**

20 Google hereby demands a trial by jury on all issues so triable raised by Sonos's  
21 Second Amended Complaint and Google's Counterclaims.  
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1 DATED: July 25, 2025

Respectfully submitted,

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3 QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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