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8 *Attorneys for Plaintiff*
9 CLOUD SYSTEMS HOLDCO IP LLC

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11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION**

14 CLOUD SYSTEMS HOLDCO IP
15 LLC,

Plaintiff,

16 v.

17 RING LLC,

18 Defendant.

Case No.: 2:23-cv-10910

**PLAINTIFF’S ORIGINAL
COMPLAINT FOR PATENT
INFRINGEMENT**

(35 U.S.C. § 271)

JURY TRIAL DEMANDED

21 **PLAINTIFF’S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**
22

23 Cloud Systems Holdco IP LLC (“Cloud”) files this Original Complaint and demand
24 for jury trial seeking relief from patent infringement of the claims of U.S. Patent No.
25 7,957,051 (“the ’051 patent”) (referred to as the “Patent-in-Suit”) by Ring LLC
26 (“Defendant” or “Ring”).
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1 **I. THE PARTIES**

2 1. Cloud Systems Holdco IP is a Texas Limited Liability Company with its
3 principal place of business located in Travis County, Texas.

4
5 2. On information and belief, Ring LLC is a corporation existing under the laws
6 of Delaware having a principal place of business at 12515 Cerise Ave, Hawthorne,
7 CA 90250.

8
9 3. On information and belief, Defendant sells and offers to sell products and
10 services throughout California, including in this judicial district, and introduces
11 products and services that perform infringing methods or processes into the stream of
12 commerce knowing that they would be sold in California and this judicial district.
13 Defendant can be served with process through their registered agent, Corporation
14 Service Company dba CSC - Lawyers Incorporating Service, 2710 Gateway Oaks
15 Drive Suite 150N, Sacramento, California 95833, at its place or business, or wherever
16 they may be found.

17 **II. JURISDICTION AND VENUE**

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

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

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

17 **A. Infringement of the '051 Patent**

18 7. On July 5, 2011, U.S. Patent No. 7,975,051 ("the '051 patent", attached as
19 Exhibit A) entitled "System and method for control and monitoring of multiple
20 devices and inter-device connections," was duly and legally issued by the U.S. Patent
21 and Trademark Office. Cloud Systems Holdco IP LLC owns the '051 patent by
22 assignment.
23
24

25 8. The '051 patent relates to a system and method for control and monitoring of
26 devices and inter-device connections located within an environment using a control
27 client.
28

1 9. Defendants maintain, operate, and administer systems, products, and services
2 for enabling a method for controlling an environment that infringes one or more
3 claims of the '051 patent, including one or more of claims 1-27, literally or under the
4 doctrine of equivalents. Defendant puts the inventions claimed by the '051 Patent into
5 service (i.e., used them); but for Defendant's actions, the claimed-inventions
6 embodiments involving Defendant's products and services would never have been
7 put into service. Defendant's acts complained of herein caused those claimed-
8 invention embodiments as a whole to perform, and Defendant's procurement of
9 monetary and commercial benefit from it.

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13 10. Support for the allegations of infringement may be found in the chart attached
14 as Exhibit B. These allegations of infringement are preliminary and are therefore
15 subject to change.

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17 11. Defendant has and continues to induce infringement. Defendant has actively
18 encouraged or instructed others (e.g., its customers and/or the customers of their
19 related companies), and continues to do so, on how to use its products and services
20 (e.g., method for controlling an environment, comprising establishing communication
21 between a server and a control client) and related services such as to cause
22 infringement of one or more of claims 1-27 of the '051 patent, literally or under the
23 doctrine of equivalents. Moreover, Defendant has known of the '051 patent and the
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1 technology underlying it from at least the issuance of the patent.¹ For clarity, direct
2 infringement is previously alleged in this complaint.
3

4 12. Defendant has and continues to contributorily infringe. Defendant has actively
5 encouraged or instructed others (e.g., its customers and/or the customers of their
6 related companies), and continues to do so, on how to use its products and services
7 (e.g., method for controlling an environment, comprising establishing communication
8 between a server and a control client) and related services such as to cause
9 infringement of one or more of claims 1-27 of the '051 patent, literally or under the
10 doctrine of equivalents. Moreover, Defendant has known of the '051 patent and the
11 technology underlying it from at least the issuance of the patent.² For clarity, direct
12 infringement is previously alleged in this complaint.
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16 13. Defendant has caused and will continue to cause Plaintiff damage by direct and
17 indirect infringement of (including inducing infringement and contributory
18 infringement) the claims of the '051 patent.
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20 14. Plaintiff is a non-practicing entity, with no products to mark. To the extent any
21 licenses are granted, Plaintiff has made reasonable efforts to ensure compliance with
22 35 USC § 287(a). Further, all conditions precedent to recovery are met.
23

24 **IV. CONDITIONS PRECEDENT**

25 _____
26 ¹ Plaintiff reserves the right to amend if discovery reveals an earlier date of
27 knowledge.

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

1 15.Plaintiff is a non-practicing entity, with no products to mark. Plaintiff has plead
2 all statutory requirements to obtain pre-suit damages. Further, all conditions precedent
3 for recovery are met.
4

5 **V. PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiff prays for relief as follows:
7

- 8 a. enter judgment that Defendants have infringed the claims of the '051 patent;
9
10 b. award Plaintiff damages in an amount sufficient to compensate it for
11 Defendants' infringement of the Patent-in-Suit in an amount no less than a
12 reasonable royalty or lost profits, together with pre-judgment and post-
13 judgment interest and costs under 35 U.S.C. § 284;
14
15 c. award Plaintiff an accounting for acts of infringement not presented at trial and
16 an award by the Court of additional damage for any such acts of infringement;
17
18 d. declare this case to be "exceptional" under 35 U.S.C. § 285 and award Plaintiff
19 its attorneys' fees, expenses, and costs incurred in this action;
20
21 e. declare Defendants' infringement to be willful and treble the damages,
22 including attorneys' fees, expenses, and costs incurred in this action and an
23 increase in the damage award pursuant to 35 U.S.C. § 284;
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26 f. a decree addressing future infringement that either (if) awards a permanent
27 injunction enjoining Defendants and their agents, servants, employees,
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1 affiliates, divisions, and subsidiaries, and those in association with Defendants
2 from infringing the claims of the Patent-in-Suit, or (ii) awards damages for
3 future infringement in lieu of an injunction in an amount consistent with the
4 fact that for future infringement the Defendants will be adjudicated infringers
5 of a valid patent, and trebles that amount in view of the fact that the future
6 infringement will be willful as a matter of law; and
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10 g. award Plaintiff such other and further relief as this Court deems just and proper.

11 Dated: January 2, 2024

Respectfully submitted,

12
13 RAMEY LLP

14 /s/ Susan S.Q. Kalra
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Attorneys for Plaintiff
CLOUD SYSTEMS HOLDCO IP LLC

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DEMAND FOR JURY TRIAL

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

Dated: January 2, 2024

Respectfully submitted,

RAMEY LLP

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