



Lee Sullivan Shea & Smith LLP

George I. Lee | Attorney

656 W Randolph St
Floor 5W
Chicago, Illinois 60661

Direct
Mobile

VIA COURIER

November 1, 2018

Gordon A. Simmonds
President & Chief Executive Officer
Lenbrook Inc. d/b/a Bluesound International
633 Granite Court
Pickering, Ontario, Canada – L1W 3K1

Dean Miller
President & Chief Executive Officer
Lenbrook America Corp. d/b/a Bluesound International
30316 Camino Porvenir
Rancho Palos Verdes, CA 90275

Re: Notice of Infringement of Sonos's Patents

Dear Messrs. Simmonds & Miller:

We represent Sonos, Inc. ("Sonos") of Santa Barbara, California in intellectual property matters. Starting in 2002, Sonos set out to create an easy, reliable way to play any music, in any room, without wires. This ultimately led to the Sonos Wireless HiFi System, which was a radically different experience in home audio and created a new market category – the modern wireless multi-room audio market. Sonos continues to diligently build, learn from, and revise this experience for its users.

Sonos has protected this experience and now is the owner of over 800 patents. Sonos's patents cover technology that drives consumer demand for its leading multi-room audio products. These include fundamental aspects of modern multi-room audio systems such as managing groups of devices, synchronizing playback of audio within groups of devices, and controlling volume across grouped devices.

Sonos's patents have been recognized as being of the highest quality and utility. Indeed, in its analysis of "[t]he technology world's most valuable patent portfolios," IEEE ranked Sonos's patent portfolio second in electronics, behind only Apple. See <https://spectrum.ieee.org/static/interactive-patent-power-2017>. Sonos identifies the many patents that are incorporated into its products on its website at <https://www.sonos.com/en-us/legal/patents>.

