



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>.

Since creating the market, Sonos has observed competitors entering the wireless multi-room audio market using the technology and experiences created and patented by Sonos. As a result, Sonos has been forced to assert its patents in Federal court. See *Sonos Inc. v. D&M Holdings, Inc.*, C.A. No. 14-1330-RGA (D. Del.) (jury finding D&M willfully infringed Sonos's patents in bellwether trial). The patents that Sonos asserted in such proceedings included, *inter alia*:

- **U.S. Patent No. 9,195,258** entitled "System and Method for Synchronizing Operations Among a Plurality of Independently Clocked Digital Data Processing Devices"
- **U.S. Patent No. 8,588,949** entitled "Method and Apparatus for Adjusting Volume Levels In a Multi-Zone System"
- **U.S. Patent No. 7,571,014** entitled "Method and Apparatus for Controlling Multimedia Players In a Multi-Zone System"

We believe that your company is infringing one or more claims of at least the Sonos U.S. patents listed below by using, manufacturing, offering for sale, selling and/or importing wireless multi-room audio products in/into the United States that practice the technology covered by these Sonos patents (and/or inducing or contributing to such activity by others), including but not limited to the PULSE FLEX, PULSE FLEX 2i, PULSE MINI, PULSE MINI 2i, PULSE, PULSE 2, PULSE 2i, PULSE SOUNDBAR, PULSE SOUNDBAR 2i, PULSE SUB, NODE, NODE 2, NODE 2i, POWERNODE, POWERNODE 2, POWERNODE 2i, VAULT, VAULT 2, and VAULT 2i audio devices along with the corresponding Bluesound Controller and BluOS Controller apps.

Synchronization Patent(s):

- US8020023
- US8234395
- US8370678
- US8689036
- US8938637
- US9158327
- US9164531
- US9164532
- US9164533
- US9170600
- US9176520
- US9182777
- US9189011
- US9195258
- US9207905
- US9213356
- US9213357
- US9218017
- US9348354
- US9658820
- US9727302
- US9727303
- US9727304

- US9733891
- US9733892
- US9733893
- US9740453
- US9778897
- US9778898
- US9778900

Group Volume Patent(s):

- US8588949

Group Management Patent(s):

- US8483853
- US9348824
- US9916125

Stereo Pair & Home Theatre Patent(s):

- US8788080
- US9202509
- US9219959
- US9438193
- US9516440
- US9680433
- US9766853

- US9928026
 - US10050594
 - US10051398
- Setup Patent(s):**
- US8868698

Advanced Playback Control Patent(s):

- US9241355
- US9363255
- US9495076
- US9648071
- US9654821
- US9703521
- US9735978
- US9798510
- US9860589
- US9883234
- US9967615

Failure Recovery Patent(s):

- US9507560

- US9940091

Source Switching Patent(s):

- US8938312
- US9681223
- US9686606

Orientation Patent(s):

- US9042556
- US9748647

Power Save Patent(s):

- US10061379
- US8024055
- US8843224
- US9246442
- US9252721

Sound Profile Patent(s):

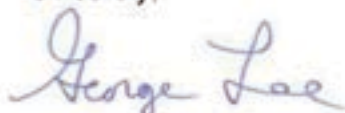
- US8923997
- US9734243

In bringing your attention to this matter, we would like to assure you that our current intention is to allow your company to continue its use of Sonos's patents through a license. Please contact me for licensing terms and rates by telephone at (212) 750-8888 or email at lee@lsas.com

Continued unauthorized use of Sonos's patented technology, however, will significantly increase your liability and the likelihood that this matter will not be resolvable without a different course of action.

We look forward to working with you to amicably resolve this matter.

Sincerely,



George I. Lee
Partner

