

1 Stefan Szpajda (SBN 282322)
2 stefan@foliolaw.com
3 **FOLIO LAW GROUP PLLC**
4 1200 Westlake Ave. N. Ste. 809
5 Seattle, WA 98109
6 Tel: (206) 809-6809

7 David Stein (SBN 198256)
8 **OLSON STEIN LLP**
9 240 Nice Lane #301
10 Newport Beach, CA 92663
11 Tel: (949) 887-4600
12 dstein@olsonstein.com

13 *Attorneys for Plaintiff*
14 *Universal Electronics Inc.*
15 *Additional counsel on last page*

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **SOUTHERN DIVISION**

19 UNIVERSAL ELECTRONICS INC.,
20 a Delaware Company,

21 Plaintiff,

22 v.

23 AMAZON.COM, INC.,
24 AMAZON WEB SERVICES, INC., and
25 AMAZON.COM SERVICES LLC,
26 Delaware Corporations,

27 Defendant.

Case No. 8:26-cv-2117

COMPLAINT

COMPLAINT

Plaintiff Universal Electronics Inc. (“UEI”) files this Complaint against Defendants Amazon.com, Inc. (“Amazon.com”), Amazon Web Services, Inc. (“AWS”), and Amazon.com Services LLC (formerly “Amazon.com Services Inc.” and referred to herein as “Amazon Services”) (collectively, “Defendant” or “Amazon”).

NATURE OF THE CASE

1. This is an action for the infringement of five United States Patents: U.S. Patent Nos. 9,706,252 (“the ’252 patent”), 11,676,480 (“the ’480 patent”), 11,102,538 (“the ’538 patent”), 11,575,534 (“the ’534 patent”), and 11,032,598 (“the ’598 patent”) (collectively, “the Asserted Patents”).

2. Amazon has been making, using, selling, offering for sale, and/or importing certain products, including without limitations previously available, current, and soon to be available versions of the Echo, Echo Plus, Echo Dot, Echo Dot Max, Echo Hub, Echo Pop, Echo Spot, Echo Show, Echo Studio, Fire TV Stick, Fire TV Stick 4k, Fire TV Stick Lite, Fire TV Stick 4k Max, Fire TV Stick HD Alexa Voice Remote, Fire TV Alexa Voice Remote Pro, Fire TV Cube, Alexa App, Prime Video Mobile App, and related software (collectively, “the Accused Instrumentalities”), thereby infringing the Asserted Patents in violation of 35 U.S.C. § 271.

3. AWS and Amazon Services are wholly owned subsidiaries of Amazon.com. Amazon.com operates, manages, and relies on AWS’s and Amazon Services’ systems to make, use, sell, offer for sale, and import certain products and services in the United States. The acts of alleged infringement recited herein can be traced directly to Amazon.com through its assertion of management, control, and interference with AWS’s and Amazon Services’ operations in a manner that surpasses control incident to ownership alone. Amazon.com offers products and services that rely on, use, and interoperate with AWS and Amazon Services infrastructure, such as the Accused Instrumentalities. On information and belief, there exists and at all relevant times has existed a unity of interest, ownership, and control between Amazon.com on one hand and AWS and Amazon Services on the

1 other hand that would make recognition of their separate corporate forms a fraud, promote
2 injustice, and result in an inequitable outcome.

3 4. UEI seeks appropriate damages, injunctive relief, and prejudgment and post-
4 judgment interest for Defendant's infringement of the Asserted Patents.

5 **THE PARTIES**

6 5. Plaintiff UEI is a 40-year-old public company based in Scottsdale, Arizona. It
7 is the technology leader in home entertainment and home automation control, winning
8 numerous awards related to universal entertainment control processes and technology.
9 Throughout its 40-year history, UEI has consistently prioritized investments in research
10 and development and technology acquisitions that have allowed it to pioneer, patent, and
11 perfect key technologies in the area of entertainment interaction and control. As a result,
12 UEI holds over 500 U.S. patents related to TV, home entertainment, and home control
13 technologies and has many additional patent applications pending in the United States and
14 jurisdictions throughout the world. Many of the world's leading consumer electronics
15 OEM brands and subscription broadcasting operators purchase or license UEI's control
16 technologies.

17 6. UEI is a Delaware corporation with its principal place of business located at
18 15147 N. Scottsdale Road, Suite H300 in Scottsdale, Arizona 85254. UEI maintains a
19 research and development facility and other offices in this District located at 201 E.
20 Sandpointe Ave. 7th Floor, in Santa Ana, California 92707. UEI owns the Asserted Patents.

21 7. On information and belief, Amazon.com is a corporation existing under the
22 laws of Delaware with a principal address of 410 Terry Avenue North, in Seattle,
23 Washington 98109, and has a regular and established place of business in this District
24 located at 17300 Laguna Canyon Rd in Irvine, California 92618.

25 8. On information and belief, AWS is a Delaware corporation with a principal
26 address of 410 Terry Avenue North, Seattle, Washington, 98109, and is a subsidiary of
27 Amazon.com, Inc.

Instrumentalities within this District. Defendant's infringement has caused substantial injury to UEI, including within this District.

15. Amazon resides in this District within the meaning of 28 U.S.C. § 1400(b). Amazon has committed acts of infringement within this District and has regular and established places of business here.

16. Venue is proper in this District. There have been numerous cases against Amazon in this District involving some of the same Accused Instrumentalities as in this case where Amazon did not challenge venue at all. *See e.g. Longitude Licensing Limited v. Amazon.com, Inc.*, No. 8:23-cv-00039- JWH-DFM (C.D. Cal. Jan. 9, 2023); *NXP USA, Inc. v. MediaTek Inc. et al*, No. 8:21-cv-01810-JVS (ADSx) (C.D. Cal. Nov. 1, 2021); *SpeakWare, Inc. v. Amazon.com, Inc.*, No. 8:18-cv-01303-DOC (DFMx) (C.D. Cal. Jul. 26, 2018); *Broadcom Corporation et al v. Amazon.com, Inc. et al*, No. 8:16-cv-01774-JVS-JCGx (C.D. Cal. Sept. 23, 2016).

17. In addition, Amazon's operations in the Central District of California are substantial and varied, and include employees and open positions that relate to the Accused Instrumentalities including Echo and Fire Stick products. For example, Amazon employees in Irvine list varied job titles on LinkedIn such as Sr. Software Engineer - Fire TV & Smart TV Platform,¹ Sr. Software QA Engineer – Amazon Lab126,² Software Development Engineer at Amazon Lab126,³ Senior Product Manager,⁴ Software Development Engineer

¹ See <https://www.linkedin.com/in/ramamohan-bommireddy/> (last visited August 6, 2026) ("I build the software that powers Amazon Fire TV.").

² See <https://www.linkedin.com/in/vicknesh-selvamani-8444378b/> (last visited August 6, 2026) ("I work on developing and testing innovative software solutions for smart devices, such as Fire TV, Echo, and Kindle.").

³ See <https://www.linkedin.com/in/pavanpattanada/> (last visited August 6, 2026) ("working as part of the Echo team.").

⁴ See <https://www.linkedin.com/in/pankajfadnavis/> (last visited August 6, 2026) ("I lead global subscription growth initiatives for Fire TV and Fire Tablet devices.").

at Amazon,⁵ and Principal Product Manager - Tech, Device OS.⁶ Additionally, Amazon advertises that it is currently hiring for 96 positions in Irvine,⁷ including numerous positions related to its Devices divisions: Principal Product Manager - Technical, Alexa Connections,⁸ Software Development Engineer - Real Time Visual Intelligence,⁹ Software Dev Engineer,¹⁰ and Sr. Software Development Engineer - FireTV.¹¹

THE ASSERTED PATENTS

18. The '252 patent is titled "System and Method for User Monitoring and Intent Determination" and was issued by the United States Patent Office to inventors Arsham Hatambeiki and Paul Arling on July 11, 2017. The earliest application related to the '252 patent was filed on February 4, 2013. A true and correct copy of the '252 patent is attached as **Exhibit A**.

19. UEI is the owner of all right, title, and interest in and to the '252 patent with the full and exclusive right to bring suit to enforce the '252 patent.

20. The '252 patent is valid and enforceable under the United States Patent Laws.

21. The '252 patent is generally directed to enhanced control of home entertainment systems using user-related inputs (e.g., image/audio sensing, presence/interaction detection) to automate system behavior and responsiveness. For

⁵ See <https://www.linkedin.com/in/oscar-lim-b2033233/> (last visited August 6, 2026) ("[I] develop software for Echo Family Devices, Alexa Gadgets, and Alexa Services integrating new technology initiatives into Alexa to bring new levels of user engagement to customers all around the world.").

⁶ See <https://www.linkedin.com/in/stefankyap/> (last visited August 6, 2026) ("responsible for operating system strategy and portfolio planning across Amazon Echo Devices.").

⁷ See <https://amazon.jobs/content/en/locations/united-states/california/irvine> (last visited August 6, 2026).

⁸ See <https://amazon.jobs/en/jobs/10469631/principal-product-manager-technical-alexa-connections> (last visited August 6, 2026).

⁹ See <https://amazon.jobs/en/jobs/10453287/software-development-engineer-real-time-visual-intelligence> (last visited August 6, 2026).

¹⁰ See <https://amazon.jobs/en/jobs/10390344/software-dev-engineer> (last visited August 6, 2026).

¹¹ See <https://amazon.jobs/en/jobs/10483704/sr-software-development-engineer-firetv> (last visited August 6, 2026).

1 example, claim 7 of the '252 patent is generally directed to a sensor-driven method for
2 proactively readying and then restoring a home entertainment system's controlling device
3 based on predicted user interaction. The problem addressed is that conventional systems
4 lack mechanisms to use user presence or interaction cues to ready controls before the user
5 acts and to revert when the anticipated action does not occur, leading to poorer user
6 experience and unnecessary power or attention costs. Claim 7 solves this by: receiving
7 event data via image and/or sound sensing interfaces; determining whether that data
8 indicates a preparatory event; when it does, executing a first anticipatory action by the
9 controlling device to transition it from a first state to a second, "readied" state for an
10 anticipated user interaction with the controlling device (e.g., moving from quiescent to a
11 more responsive state); and then determining whether the anticipated event occurs, and if
12 it does not within a set time, executing a restorative action to transition the controlling
13 device back to the first, not-readied state. These and other limitations remove the claims of
14 the '252 patent from the realm of abstract ideas and render its claims patent eligible.

15 22. The '480 patent is titled "System and Method for Simplified Setup of a
16 Universal Remote Control" and was issued by the United States Patent Office to inventors
17 Joseph Lee Haughawout and Patrick H. Hayes on June 13, 2023. The earliest application
18 related to the '480 patent was filed on September 8, 2005. A true and correct copy of
19 the '480 patent is attached as **Exhibit B**.

20 23. UEI is the owner of all right, title, and interest in and to the '480 patent with
21 the full and exclusive right to bring suit to enforce the '480 patent.

22 24. The '480 patent is valid and enforceable under the United States Patent Laws.

23 25. The '480 patent is directed to systems and software for simplifying the setup
24 and provisioning of a controlling device (e.g., a universal remote) by using another host
25 device (e.g., a set-top box/media access device) to drive an on-screen, interactive, code-
26 selection workflow for the target appliance, such as a TV or other controllable device. The
27 problem addressed is that traditional universal-remote setup is demanding and
28 frustrating—users lose code tables, brand/model references change, and manual trial-and-

error is error-prone—so there is a need for a more user-friendly, guided setup process. Claim 1, for example, solves this by reciting a non-transitory computer-readable medium with instructions that cause a first device to display, on a third device’s display, a series of interactive prompts, each tied to a specific command-code set for a previously identified brand/type of the third device (step (a)). The instructions further cause the first device to receive communications from a second device (the controlling device) in a format recognizable by the first device in response to each prompt (step (b)). The workflow automatically repeats the prompting/response cycle until the prompts are exhausted or a final response indicates that the command-code set associated with the last prompt should be provisioned to the second device for use in controlling the functional operations of the third device (step (c)). The specific limitations—on-screen interactive prompts mapped to discrete code sets for a prior-identified brand/type; receipt of second-device responses in a recognizable format; and automatic iteration culminating in provisioning—implement the claimed, guided setup that reduces user burden and error compared to manual code lookups. These and other limitations remove the claims of the ’480 patent from the realm of abstract ideas and render its claims patent eligible.

26. The ’538 patent is titled “System and Method for Ubiquitous Appliance Control” and was issued by the United States Patent Office to inventors Jeremy Black and Patrick H. Hayes on August 24, 2021. The earliest application related to the ’538 patent was filed on June 27, 2008. A true and correct copy of the ’538 patent is attached as **Exhibit C**.

27. UEI is the owner of all right, title, and interest in and to the ’538 patent with the full and exclusive right to bring suit to enforce the ’538 patent.

28. The ’538 patent is valid and enforceable under the United States Patent Laws.

29. The ’538 patent is generally directed to appliance control in which a network-capable relay/slave device serves simple GUI pages to a personal communication device and, in response to user interactions, issues appropriate command sequences to A/V equipment—e.g., a request like “switch_to_abc.irm” causes the relay to retrieve stored

1 commands to tune a set-top box to ABC—so that content can be invoked by human-
2 friendly identifiers rather than device-specific codes. The problem addressed is bridging
3 the gap between a user selecting content “by name” (e.g., a network/broadcaster) and the
4 heterogeneous, device-specific command sequences needed to actually tune equipment and
5 present the corresponding media stream on a display, with the prior art not showing a single
6 device that both uses the name data to locate the command sequence and then executes it
7 to present the content. Claim 1, for example, solves this by reciting instructions on non-
8 transitory media that cause a device to: (i) receive data identifying by name one of multiple
9 media content sources; (ii) use that name-identifying data to locate a sequence of
10 commands that will cause a display device to present the media stream from the named
11 source; and (iii) execute the located sequence so the stream from the named source is
12 actually presented on the display device. These and other limitations remove the claims of
13 the ’538 patent from the realm of abstract ideas and render its claims patent eligible.

14 30. The ’534 patent is titled “System and Method for Aggregating and Analyzing
15 the Status of a System” and was issued by the United States Patent Office to inventors
16 Arsham Hatambeiki and Paul D. Arling on February 7, 2023. The earliest application
17 related to the ’534 patent was filed on February 10, 2015. A true and correct copy of
18 the ’534 patent is attached as **Exhibit D**.

19 31. UEI is the owner of all right, title, and interest in and to the ’534 patent with
20 the full and exclusive right to bring suit to enforce the ’534 patent.

21 32. The ’534 patent is valid and enforceable under the United States Patent Laws.

22 33. The ’534 patent is generally directed to a centralized software agent that
23 coordinates smart home appliances by discovering them, monitoring their states, and
24 automatically issuing appropriate control commands to change device states when
25 predefined conditions occur. The problem it addresses is that modern smart devices often
26 cannot readily share information or cooperate across brands and protocols, making cross-
27 device automation difficult for users and systems. To solve this, claim 1, for example,
28 requires: performing device discovery to build a listing of all appliances in the system;

1 using that listing to identify corresponding command code sets (i.e., command collections,
2 system data, and protocols) for each device so the agent can generate signals the specific
3 devices will understand; associating, within the centralized software agent, particular
4 “action-triggering” device states with actions to be taken; receiving device-state messages
5 over an external wireless channel and determining when a current state matches a triggering
6 state; and, upon a match, using the identified command code sets to generate and transmit
7 operational commands over the wireless channel to target appliances to effect a change of
8 state. These and other limitations remove the claims of the ’534 patent from the realm of
9 abstract ideas and render its claims patent eligible.

10 34. The ’598 patent is titled “System and Method for Retrieving Information
11 While Commanding Operation of an Appliance” and was issued by the United States Patent
12 Office to inventors Marcel Hilbrink, Patrick H. Hayes, and Jeremy K. Black on June 8,
13 2021. The earliest application related to the ’598 patent was filed on July 16, 2004. A true
14 and correct copy of the ’598 patent is attached as **Exhibit E**.

15 35. UEI is the owner of all right, title, and interest in and to the ’598 patent with
16 the full and exclusive right to bring suit to enforce the ’598 patent.

17 36. The ’598 patent is valid and enforceable under the United States Patent Laws.

18 37. The ’598 patent is generally directed to enabling a portable electronic device
19 (e.g., a remote/control device with media rendering) to hand off an in-progress media
20 stream to an appliance via a wireless interface device so the appliance plays the stream
21 instead of the portable device. The problem addressed is the lack of a seamless, user-
22 minimal way to move media playback from a portable device to a home appliance (such as
23 a TV or receiver) when a suitable wireless connection becomes available, avoiding manual
24 steps to reconfigure outputs and restart playback on the appliance. For example, claim 1
25 solves this by: (i) having the portable device detect that it has been placed into wireless
26 communication with a wireless interface device interfaced to the appliance, and (ii) in
27 response to that detection, automatically rerouting the received media stream from local
28 playback on the portable device to the wireless interface device for playback by the

1 appliance, thereby shifting output without user intervention. These and other limitations
 2 remove the claims of the '598 patent from the realm of abstract ideas and render its claims
 3 patent eligible.

4 **THE ACCUSED INSTRUMENTALITIES**

5 38. Examples of the Accused Instrumentalities include, without limitation, the
 6 following Amazon products and related software: Echo, Echo Plus, Echo Dot, Echo Dot
 7 Max, Echo Hub, Echo Pop, Echo Spot, Echo Show, Echo Studio, Fire TV Stick, Fire TV
 8 Stick 4k, Fire TV Stick Lite, Fire TV Stick 4k Max, Fire TV Stick HD Alexa Voice
 9 Remote, Fire TV Alexa Voice Remote Pro, Fire TV Cube, Alexa App, and Prime Video
 10 Mobile App. For example and without limitation, various models of the Accused
 11 Instrumentalities are discussed below.

12 39. Amazon Prime Video is a streaming video service by Amazon that allows
 13 users to “watch hundreds of TV shows and movies on [their] favorite devices.”¹² Prime
 14 Video can be accessed through a web browser or through the Prime Video Mobile App,
 15 which is available for iOS and Android phone, tablet, or select Smart TVs.¹³ The Amazon
 16 Prime Video Casting¹⁴ Feature works by allowing Amazon Prime Video users to stream
 17 shows and movies from the Prime Video Mobile App to another screen, such as an Android
 18 TV, Fire TV, Echo Show 15, and other devices.¹⁵

19 40. In general, the Amazon Fire TV Stick is a device which lets users “[e]njoy
 20 streaming movies and shows from a variety of services” by simply plugging the product
 21
 22

23 ¹² See <https://www.amazon.com/gp/video/splash/getTheApp> (last visited August 6, 2026).

24 ¹³ *Id.*

25 ¹⁴ “Video Casting” is the process of wirelessly transmitting or sending audio or video
 26 from one device to another. See <https://www.bestbuy.com/discover-learn/the-difference-between-casting-and-mirroring/pcmcat1704902219059> (last visited August 6, 2026).

27 ¹⁵ See <https://www.primevideo.com/help?nodeId=GDSGFYXXPCSAGVTH#:~:text=To%20cast%20to%20Chromecast%20/%20Android,your%20Echo%20Show%2015%20device>
 28 (last visited August 6, 2026).

1 into the HDMI port on a user's TV.¹⁶ Users plug the Fire TV Stick into their TV, connect
 2 it to WiFi, and are then able to access different kinds of streaming services.¹⁷ To access
 3 these streaming services, users download free or paid apps from the Amazon Appstore,
 4 which requires users to be logged into their Amazon Account.¹⁸ Users can then navigate
 5 their app interface by using a one of the Fire TV remotes (Amazon Fire TV Remote or
 6 Voice Remote), or with a game controller (either the Amazon Fire Game Controller, or
 7 other Bluetooth game controllers).¹⁹ There are various exemplary models of Fire Sticks,
 8 including the Fire TV Stick 4K, Amazon Fire TV Stick, Fire TV Stick 4K Max, and Fire
 9 TV Stick Lite. These exemplary models are discussed in more detail below.

10 41. Amazon has sold the Fire TV Stick 4K 1st Generation since 2018; it is a media
 11 streamer that can stream ultra-high definition, 4K media.²⁰ It features Alexa for voice
 12 control with support for a wide selection of smart home devices and it can access a massive
 13 selection of streaming media both from Amazon's own libraries and most major third
 14 parties.²¹ The Alexa Voice Remote that accompanies this product can control Fire TV Stick
 15 4K as well as power and volume on a wide range of compatible IR-enabled devices,
 16 including TVs, sound bars, and A/V receivers.²² With this remote, users can also ask Alexa

17
 18 ¹⁶ See <https://www.aboutamazon.com/news/devices/amazon-fire-tv-stick> (last visited
 19 August 6, 2026).

20 ¹⁷ *Id.*

21 ¹⁸ See *id.*; see also

22 [https://www.amazonforum.com/s/question/0D5Kf00003klUHeKAM/fire-tv-stick-install-](https://www.amazonforum.com/s/question/0D5Kf00003klUHeKAM/fire-tv-stick-install-without-amazon-account)
 23 [without-amazon-account](https://www.amazonforum.com/s/question/0D5Kf00003klUHeKAM/fire-tv-stick-install-without-amazon-account) (last visited August 6, 2026) (an Amazon customer on an
 24 Amazon forum advising that “[a]ny Amazon device, from a stick, to a kindle, to a fire, to
 25 any Echo device requires an Amazon Account.”); see also
 26 <https://www.amazon.com/setting-up-fire-tv/b?ie=UTF8&node=23477579011> (last visited
 27 August 6, 2026).

28 ¹⁹ See [https://developer.amazon.com/docs/fire-tv/design-and-user-experience-](https://developer.amazon.com/docs/fire-tv/design-and-user-experience-guidelines.html)
[guidelines.html](https://developer.amazon.com/docs/fire-tv/design-and-user-experience-guidelines.html) (last visited August 6, 2026).

²⁰ See <https://www.pcmag.com/reviews/amazon-fire-tv-stick-4k> (last visited August 6,
 2026).

²¹ *Id.*

²² See [https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-](https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4k)
[streaming-media-player.html?v=ftvstick4k](https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4k) (August 6, 2026).

1 to switch TV inputs, change the channel on compatible cable/satellite set top boxes, view
 2 live camera feeds, or control lights, thermostats, and other compatible smart home
 3 devices.²³ Amazon released the Fire TV Stick 4K 2nd Generation in 2023, with many of the
 4 same core features as the 1st Generation product, including an Alexa remote that allows
 5 users to “quickly find, launch, and control content with [their] voice.”²⁴ This version of the
 6 Alexa Voice Remote included dedicated power and volume buttons to control compatible
 7 TVs, soundbars, and receivers.²⁵

8 42. The Amazon Fire TV Stick 3rd Generation shares many characteristics with
 9 the other Fire TV Stick models. Amazon released the Amazon Fire TV Stick 3rd Generation
 10 in 2020, and it is advertised as being “50% more powerful than the previous generation for
 11 fast streaming in Full HD.”²⁶ This product includes an Alexa Voice Remote that lets users
 12 search by voice to launch shows across apps.²⁷ This Alexa Voice Remote includes
 13 dedicated power, volume, and mute buttons to allow for easy control of TVs, soundbars,
 14 and A/V receivers with a single remote.²⁸

17 ²³ *Id.*

18 ²⁴ See [https://developer.amazon.com/docs/device-specs/device-specifications-](https://developer.amazon.com/docs/device-specs/device-specifications-comparison-table.html)
 19 [comparison-table.html](https://developer.amazon.com/docs/device-specs/device-specifications-comparison-table.html) (with “Fire TV Stick 4K-1st Gen (2018)” and “Fire TV Stick 4K-
 20 2nd Gen (2023)-8 GB” selected) (last visited August 6, 2026); *see also*
 21 [https://www.digitalreviews.net/reviews/audio/amazon-fire-tv-stick-4k-2nd-gen-an-](https://www.digitalreviews.net/reviews/audio/amazon-fire-tv-stick-4k-2nd-gen-an-incremental-update/)
 22 [incremental-update/](https://www.digitalreviews.net/reviews/audio/amazon-fire-tv-stick-4k-2nd-gen-an-incremental-update/) (last visited August 6, 2026); *see also*
 23 <https://electronics.woot.com/offers/new-amazon-fire-tv-stick-4k-2nd-gen-1> (last visited

24 August 6, 2026).
 25 ²⁵ See [https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-](https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4k_gen2_8)
 26 [streaming-media-player.html?v=ftvstick4k_gen2_8](https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4k_gen2_8) (last visited August 6, 2026).

27 ²⁶ See [https://help.screencloud.com/en/articles/10124990-how-to-tell-the-difference-](https://help.screencloud.com/en/articles/10124990-how-to-tell-the-difference-between-the-amazon-fire-tv-stick-models-physically)
 28 [between-the-amazon-fire-tv-stick-models-physically](https://help.screencloud.com/en/articles/10124990-how-to-tell-the-difference-between-the-amazon-fire-tv-stick-models-physically) (last visited August 6, 2026); *see*
 also [https://www.amazon.com/fire-tv-stick-with-3rd-gen-alexa-voice-](https://www.amazon.com/fire-tv-stick-with-3rd-gen-alexa-voice-remote/dp/B08C1W5N87)
[remote/dp/B08C1W5N87](https://www.amazon.com/fire-tv-stick-with-3rd-gen-alexa-voice-remote/dp/B08C1W5N87) (last visited August 6, 2026).

²⁷ See [https://www.amazon.com/fire-tv-stick-with-3rd-gen-alexa-voice-](https://www.amazon.com/fire-tv-stick-with-3rd-gen-alexa-voice-remote/dp/B08C1W5N87)
[remote/dp/B08C1W5N87](https://www.amazon.com/fire-tv-stick-with-3rd-gen-alexa-voice-remote/dp/B08C1W5N87) (last visited August 6, 2026).

²⁸ See [https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-](https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstickgen3)
[streaming-media-player.html?v=ftvstickgen3](https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstickgen3) (last visited August 6, 2026).

43. Amazon released the Amazon Fire TV Stick 4K Max 1st Generation in 2021, and was considered a product upgrade to the Fire TV Stick 4K 1st Generation.²⁹ The Amazon Fire TV Stick 4K Max 1st Generation is described as being “loaded with apps and features,” and as having an Alexa voice assistant that is built-in through the remote that can “provide information like weather reports and sports scores, search for content, and control compatible smart home devices.”³⁰ The Alexa Voice Remote that comes with this product has dedicated power and volume buttons to control a wide range of compatible IR-enabled devices including TVs, sound bars, and A/V receivers, and has convenient preset app buttons.³¹ Users can press and hold the voice button on the remote and ask Alexa to find, launch and control their content, or switch TV inputs, control lights, thermostats, and other compatible smart home devices.³² The Amazon Fire TV Stick 4K Max 2nd Generation uses the same model of Alexa remote as the device’s previous generation.³³ This remote has dedicated power, volume, and channel buttons to control compatible TVs, soundbars, and receivers.³⁴

44. The Amazon Fire TV Stick Lite launched in 2020, with Amazon describing it as an “even more affordable way to begin streaming in full HD” and reviewers calling it

²⁹ See <https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4kmax> (last visited August 6, 2026); *see also* <https://www.pcmag.com/reviews/amazon-fire-tv-stick-4k-max> (last visited August 6, 2026).

³⁰ See <https://www.pcmag.com/reviews/amazon-fire-tv-stick-4k-max> (last visited August 6, 2026).

³¹ See <https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4kmax> (last visited August 6, 2206).

³² *Id.*

³³ See https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4kmax_gen2_16 (last visited August 6, 2026); *see also* <https://dongknows.com/fire-tv-stick-4k-max-2nd-gen-2023-review/> (last visited August 6, 2026).

³⁴ See https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvstick4kmax_gen2_16 (last visited August 6, 2026).

an “ultra budget streamer with a voice remote.”³⁵ The remote that accompanies the Fire Stick Lite is similar to the one that came with the first version of the Fire TV Stick, allowing for Alexa voice searches and having basic buttons for navigating menus and accessing streaming apps.³⁶ Amazon states that the Fire TV Stick Lite comes with “all the essentials you need to get set up and start watching” and refers to the accompanying Alexa Voice Remote Lite as “a new remote that allows you to use voice to find, launch, and control content.”³⁷

45. The Amazon Fire TV Cube 3rd Generation is a media streaming product from 2022 with hands-free voice control.³⁸ “Most media hubs include some form of voice assistant or search, but the Fire TV Cube is the only one to let you use that assistant without requiring a remote.”³⁹ The Fire TV Cube acts as an Alexa smart speaker, and can do so even when the TV is turned off.⁴⁰ Though the Fire TV Cube does not require a remote, it still comes with one that is “more complex” than the remotes that typically accompany the Fire TV Sticks, for example having a wider variety of buttons specific to certain streaming

³⁵ See <https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvsticklite> (last visited August 6, 2026); see also <https://www.cnet.com/reviews/amazon-fire-tv-stick-lite-review/> (last visited August 6, 2026).

³⁶ *Id.*

³⁷ See <https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-streaming-media-player.html?v=ftvsticklite> (last visited August 6, 2026).

³⁸ See <https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-cube.html?v=ftvcubegen3> (last visited August 6, 2026); see also <https://www.pcmag.com/reviews/amazon-fire-tv-cube-2022> (last visited August 6, 2026).

³⁹ See <https://www.pcmag.com/reviews/amazon-fire-tv-cube-2022> (last visited August 6, 2026).

⁴⁰ See <https://www.whathifi.com/reviews/amazon-fire-tv-cube-3rd-generation> (last visited August 6, 2026).

platforms.⁴¹ The Fire TV Cube can also access the Alexa Assistant through the remote, and can use Alexa to control a user's compatible TV, sound bar, and receivers through voice.⁴²

46. The various Amazon Fire TV products are sold with related Alexa Remote products such as the Fire TV Stick HD Alexa Voice Remote and Amazon Fire TV Alexa Voice Remote Pro.

47. Amazon Echo is a product line "Designed for Alexa+" that consists of hands-free speaker and virtual assistant devices that interact with an end user via the Amazon Alexa cloud-based voice service.⁴³ Amazon describes Echo as being "the ultimate way to experience Alexa."⁴⁴ Amazon began selling the Amazon Echo 4th Generation smart speaker in 2020; it allows users to access the Alexa voice assistant.⁴⁵ Users are also able to use Echo through the Alexa App to control everything from volume, Bluetooth pairing, adding speakers, setting up multi-room groups, setting alarms, and more.⁴⁶ In fact, users have to use the Alexa App it for the initial setup process of their Echo device.⁴⁷

⁴¹ See <https://www.pcmag.com/reviews/amazon-fire-tv-cube-2022> (last visited August 6, 2026).

⁴² See <https://developer.amazon.com/docs/device-specs/device-specifications-fire-tv-cube.html> (last visited August 6, 2026); see also <https://www.amazon.com/dp/B09BZZ3MM7?th=1> (last visited August 6, 2026); <https://www.whathifi.com/reviews/amazon-fire-tv-cube-3rd-generation> (last visited August 6, 2026).

⁴³ See <https://www.amazon.com/b?ie=UTF8&node=210779651011> (last visited August 6, 2026); see also <https://web.archive.org/web/20260305235125/https://www.techtarget.com/searchaws/definition/Amazon-Echo> (last visited August 6, 2026).

⁴⁴ See <https://www.amazon.com/gp/browse.html?node=9818047011> (last visited August 6, 2026).

⁴⁵ See <https://www.nbcnews.com/select/shopping/new-amazon-echo-dot-ncna1241113> (last visited August 6, 2026); see also <https://www.soundguys.com/amazon-echo-4th-gen-review-42618/> (last visited August 6, 2026).

⁴⁶ See <https://www.soundguys.com/amazon-echo-4th-gen-review-42618/> (last visited August 6, 2026).

⁴⁷ *Id.*

48. The Amazon Echo Show 5 3rd Generation is a smart speaker product released in 2023 that includes a touchscreen display.⁴⁸ The built-in display allows users to do things like see news and weather at a glance, view shows and song titles, browse photos, check camera feeds, make video calls, and stream apps like Amazon Music and Prime Video.”⁴⁹ As with the Echo 4th Generation, the Echo Show 5 3rd Generation allows users to interact with the Alexa Assistant through voice and is accessible through the Alexa App.⁵⁰ The Amazon Echo Show 8 3rd Generation is another 2023 smart speaker product that includes a touchscreen display.⁵¹ It also allows users to interact with the Alexa Assistant through voice to control both the device itself and other compatible smart home devices, and has features accessible through the Alexa App such as accessing a live feed from the device’s camera.⁵² The Amazon Echo Show 15 2nd Generation is a 2024 smart speaker with a touchscreen display.⁵³ This model has both Alexa support and a capable Fire TV interface, and also comes with the same remote that accompanies most of the Fire TV Stick products.⁵⁴ As with the other Echo Show products, the Amazon Echo Show 15 2nd Generation allows users to interact with the Alexa Assistant through voice to control both the device itself and other compatible smart home devices, and has features accessible through the Alexa App.⁵⁵ The Amazon Echo Show 21, another 2024 smart speaker with a

⁴⁸ See <https://www.amazon.com/All-new-Echo-Show-5/dp/B09B2SBHQB?th=1> (last visited August 6, 2026); see also <https://www.pcmag.com/reviews/amazon-echo-show-5-3rd-gen-2023-release> (last visited August 6, 2026).

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ See <https://www.amazon.com/All-New-Echo-Show-8/dp/B0BLS3Y632?th=1> (last visited August 6, 2026); see also <https://www.cnet.com/home/smart-home/amazon-echo-show-8-2023-review-great-screen-but-alexa-is-pushy/> (last visited August 6, 2026).

⁵² See *id.*; see <https://www.pcmag.com/reviews/amazon-echo-show-8-3rd-gen-2023> (last visited August 6, 2026).

⁵³ See <https://www.amazon.com/Echo-Show-15-Smart-Display/dp/B0C5DPSW5Y?th=1> (last visited August 6, 2026); see also <https://www.pcmag.com/reviews/amazon-echo-show-15-2024> (last visited August 6, 2026).

⁵⁴ *Id.*

⁵⁵ *Id.*

touchscreen display, is “effectively identical” to the Amazon Echo Show 2nd Generation.⁵⁶ The products share a number of features, including Alexa support and a capable Fire TV interface.⁵⁷

49. The Amazon Echo Spot is a 2024 smart alarm clock that incorporates Alexa;⁵⁸ it has a screen that shows “smart display features with none of the clutter.”⁵⁹ The device allows users to control Alexa-compatible smart home devices through the touchscreen, and allows users to log into the Alexa App for optimal use of the device.⁶⁰

50. The Amazon Echo Dot 5th Generation is a 2022 smart speaker with built-in Alexa capabilities that allow a user to “ask Alexa for weather updates and to set hands-free timers, get answers to your questions and even hear jokes.”⁶¹ The Echo Dot 5th Generation also allows users to “control compatible smart home devices with [their] voice” and to build “routines triggered by built-in motion or indoor temperature sensors.”⁶²

51. The Amazon Echo Pop is a compact smart speaker with Alexa features that became available for sale in 2023.⁶³ The device allows users to “easily control compatible smart home devices like smart plugs or smart lights with [their] voice or the Alexa App.”⁶⁴

⁵⁶ See <https://www.amazon.com/Echo-Show-21-Smart-Display/dp/B0CDWWS127?th=1> (last visited August 6, 2026); see also <https://www.pcmag.com/reviews/amazon-echo-show-21> (last visited August 6, 2026).

⁵⁷ See <https://www.pcmag.com/reviews/amazon-echo-show-21> (last visited August 6, 2026).

⁵⁸ See <https://www.amazon.com/Amazon-Echo-Spot-2024-release-Smart-alarm-clock-with-vibrant-sound-Alexa-Black/dp/B0BFC7WQ6R?th=1> (last visited August 6, 2026).

⁵⁹ See <https://www.wired.com/review/echo-spot/> (last visited August 6, 2026).

⁶⁰ *Id.*

⁶¹ See https://www.amazon.com/b/?node=9818047011&ref_=mars_byline_aucc_branded (last visited August 6, 2026); see also https://www.amazon.com/dp/B09B8V1LZ3?ref=amzdvp_ucc_dp_lod_B09B8V1LZ3&th=1 (last visited August 6, 2026).

⁶² See https://www.amazon.com/dp/B09B8V1LZ3?ref=amzdvp_ucc_dp_lod_B09B8V1LZ3&th=1 (last visited August 6, 2026).

⁶³ See <https://www.amazon.com/Amazon-Echo-Alexa-fits-anywhere/dp/B09ZXJDSL5?th=1> (last visited August 6, 2026).

⁶⁴ *Id.*

1 It also allows users to interact with Alexa to “[h]ave Alexa set timers, check the weather,
2 read the news, re-order paper towels, make calls, answer questions, and more.”⁶⁵

3 52. The Amazon Echo Hub is an Alexa-enabled control panel for smart home
4 devices that became available for purchase in 2024.⁶⁶ Amazon claims that the Echo Hub
5 allows users to streamline their smart homes, for example because the device can
6 “customize the controls and widgets[] displayed on [the] dashboard to quickly adjust
7 devices, view cameras, start routines, and more.”⁶⁷ The Echo Hub can also control select
8 devices, such as lights, switches, and plugs, even if internet is down.⁶⁸ Overall, the Echo
9 Hub was designed to make it easy to organize and control the smart home devices in a
10 user’s home.⁶⁹

11 53. The Amazon Alexa App is a mobile application that allows users to set up and
12 manage Amazon Echo and other Alexa-enabled devices, control smart home devices, and
13 use Alexa as a virtual assistant on their phone.⁷⁰ The Alexa App is a key feature of many
14 of the Accused Instrumentalities covered above.

15 **AMAZON’S CONTROL OVER AND BENEFIT**
16 **FROM THE ACCUSED INSTRUMENTALITIES**

17 54. Amazon exercises control over the Accused Instrumentalities in several ways,
18 including without limitation by requiring users to sign into an Amazon account to access
19

20
21 ⁶⁵ *Id.*

22 ⁶⁶ See <https://www.aboutamazon.com/news/devices/amazon-echo-hub-best-features> (last
visited August 6, 2026).

23 ⁶⁷ See <https://www.amazon.com/Echo-Hub/dp/B0BCR7M9KX?th=1> (last visited August
6, 2026).

24 ⁶⁸ See <https://www.aboutamazon.com/news/devices/amazon-echo-hub-best-features> (last
visited August 6, 2026).

25 ⁶⁹ *Id.*

26 ⁷⁰ See <https://apps.apple.com/us/app/amazon-alexa/id944011620> (last visited August 6,
2026); see also

27 <https://www.amazon.com/gp/help/customer/display.html?nodeId=GGYT25QXMYBEC>
28 [H2E#:~:text=The%20Alexa%20app%20gives%20you,play%20games%20with%20Alexa%20Skills](https://www.amazon.com/gp/help/customer/display.html?nodeId=GGYT25QXMYBEC&H2E#:~:text=The%20Alexa%20app%20gives%20you,play%20games%20with%20Alexa%20Skills) (last visited August 6, 2026).

the functionalities of various apps and products, and benefits from its ongoing control of the Accused Instrumentalities.

55. Amazon Prime Video is offered by Amazon either as a standalone subscription or as a benefit of having an Amazon Prime membership.⁷¹ Once a user has purchased a subscription to Prime Video by itself or signed up for an Amazon Prime membership, they need to log into or create an Amazon account in order to access Prime Video.⁷² This can be done through a web browser, or through the Prime Video App on a compatible device (like a smart TV) or mobile phone.⁷³ Amazon Prime Video uses Amazon Web Service (AWS) Cloud and AWS Elemental Cloud as the underlying technologies for all its services, further showcasing Amazon's control of the product.⁷⁴ Additionally, Prime Video users must continuously apply app updates as they are released by Amazon or they will lose access to streaming capabilities.⁷⁵ The Prime Video Casting feature, which can be used while streaming shows and movies through Prime Video, by default also requires users to be logged into an Amazon account and is built upon Amazon technologies.

56. Similarly, for the Alexa App, users must log into their Amazon account in order to access the app's functionalities.⁷⁶ These functionalities include using the Alexa in-app assistant, manage Alexa-enabled devices, and controlling smart home devices and

⁷¹ See <https://www.businessinsider.com/guides/streaming/what-is-prime-video> (last visited August 6, 2026).

⁷² See <https://www.primevideo.com/help?nodeId=GQDJBT3CFLKPBV> (last visited August 6, 2026).

⁷³ *Id.*

⁷⁴ See <https://aws.amazon.com/solutions/case-studies/amazon-prime-video/> (last visited August 6, 2026).

⁷⁵ See e.g. <https://www.amazonforum.com/s/question/0D5Kf00003Bw4tBKAR/need-to-update-prime-video-app> (Amazon forum exchange lead by a customer who lost access to streaming because they were not able to update their Prime Video app) (last visited August 6, 2026).

⁷⁶ See https://www.amazon.in/gp/help/customer/display.html?ref_=hp_left_v4_sib&nodeId=GM4JYXHYDSTNQRK (last visited August 6, 2026).

1 music playback across Alexa devices.⁷⁷ The Alexa App interacts with Amazon's cloud to
2 execute these functionalities; for example, when a user speaks to Alexa, a recording of
3 what the user said to Alexa is sent to Amazon's cloud, where Amazon processes the user's
4 request and other information before Alexa then responds.⁷⁸ Users were previously able to
5 change Alexa settings so that recordings from interacting with Alexa were stored and
6 processed locally, rather than being sent to Amazon servers, but that setting was removed
7 in March 2025.⁷⁹ The Alexa App, much like Prime Video, is built on a foundation of other
8 Amazon technologies, such as AWS DynamoDB storage service and AWS Private
9 Certificate Authority (which creates private certificates for each smart-home device to
10 prove its identity and maintain secure connections).⁸⁰ Also similar to Prime Video, Alexa
11 App users must continuously apply app updates as they are released by Amazon in order
12 to continue successfully using the app.⁸¹

17 ⁷⁷ See

18 <https://www.amazon.in/gp/help/customer/display.html?nodeId=GGYT25QXMYBECH2>
19 [E](#) (last visited August 6, 2026).

20 ⁷⁸ See

21 <https://www.amazon.com/gp/help/customer/display.html?nodeId=GVP69FUJ48X9DK8>
22 [V](#) (last visited August 6, 2026).

23 ⁷⁹ See [https://www.pcmag.com/news/reminder-your-alexa-voice-recordings-will-soon-be-](https://www.pcmag.com/news/reminder-your-alexa-voice-recordings-will-soon-be-sent-to-amazon)
24 [sent-to-amazon](#) (last visited August 6, 2026).

25 ⁸⁰ See [https://www.amazon.science/latest-news/the-engineering-behind-alexa-](https://www.amazon.science/latest-news/the-engineering-behind-alexa-contextual-speech-recognition)
26 [contextual-speech-recognition](#) (last visited August 6, 2026); see also

27 <https://aws.amazon.com/solutions/case-studies/amazon-alexa-case-study/> (last visited
28 August 6, 2026).

⁸¹ See

29 <https://www.amazon.com/gp/help/customer/display.html?nodeId=GMB5FVUB6REAVT>
30 [XY](#) (last visited August 6, 2026); see also [https://www.asurion.com/connect/tech-](https://www.asurion.com/connect/tech-tips/how-to-update-alexa-software/)
31 [tips/how-to-update-alexa-software/](#) (last visited August 6, 2026); see also
32 <https://www.amazon.com/gp/help/customer/display.html?nodeId=GMZQWNQRVENX4>
33 [GTQ](#) (last visited August 6, 2026).

57. Amazon states that a “basic requirement” for setting up its Fire TV Stick products is an Amazon account to use the product.⁸² This is also true for the Fire TV Cube.⁸³ When a user logs into their Amazon account on a Fire TV Device, Amazon is able to automatically download and install updates onto the Fire TV products.⁸⁴ These updates are crucial for product performance, security, and keeping up to date with features and functionalities.⁸⁵ Many of the Amazon Fire TV products also come with an Alexa-enabled remote. As noted above, Alexa interacts with Amazon’s cloud to respond to user requests. Therefore, Amazon still has control over Amazon Fire TV products, such as the Sticks and the Cube, beyond the point of sale because purchasers of the Amazon Fire TV products must have an Amazon account to (1) use the products and (2) keep the products’ software up to date. Additionally, even after a consumer has purchased these products, Amazon maintains control by enmeshing the consumer further into the universe of AWS Cloud and other Amazon technologies.

58. A core functionality of the various Amazon Echo products is built-in Alexa capabilities; as Amazon has stated, “Alexa and Echo work hand-in-hand” and “Alexa puts

⁸² See e.g.

<https://www.amazon.com/gp/help/customer/display.html?nodeId=G32KYQ2NQA9YVGQW> (last visited August 6, 2026);

https://www.amazon.com/gp/help/customer/display.html?ref=hp_left_v4_sib&nodeId=TymbaFq79bStv4Eiso (last visited August 6, 2026);

https://www.amazon.com/gp/help/customer/display.html?ref=hp_left_v4_sib&nodeId=T02r5ieBnpXtlgiwZ3 (last visited August 6, 2026); see also

<https://www.amazonforum.com/s/question/0D54P00007rZ4pQSAS/do-i-need-to-have-an-amazon-account-to-work-my-fire-stick> (interaction with Fire Stick user in Amazon forum from 2020 where Amazon employee confirms you need an Amazon account to use a Fire Stick) (last visited August 6, 2026).

⁸³ See

https://www.amazon.com/gp/help/customer/display.html?ref=hp_left_v4_sib&nodeId=GBYCE4N4B33YKGG9L (last visited August 6, 2026).

⁸⁴ See <https://www.airbeam.tv/knowledge-base/how-to-update-firestick/> (last visited August 6, 2026).

⁸⁵ *Id.*

the smart in Echo smart speakers, screens, and wearables.”⁸⁶ In particular, it is the Alexa App which allows users to “set up and manage [their] Echo devices.”⁸⁷ Amazon’s control over the Alexa App is outlined above. Because consumers’ use of the Echo line of devices is inextricable from Alexa and the Alexa App, Amazon’s control extends over the Echo line of products even past the point of purchase.

COUNT ONE

INFRINGEMENT OF U.S. PATENT NO. 9,706,252

59. UEI re-alleges and incorporates by reference all of the foregoing paragraphs.

60. UEI is the owner of the ’252 patent with full rights to pursue recovery of royalties for damages for infringement, including full rights to recover past and future damages.

61. The specification of the ’252 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

62. UEI has satisfied any requirements of 35 U.S.C. § 287(a) with respect to the ’252 patent, and UEI is entitled to damages for Amazon’s past infringement.

63. Amazon has directly infringed (literally and under the doctrine of equivalents) the ’252 patent by making, using, selling, offering for sale, or importing products that infringe the claims of the ’252 patent and by inducing others to infringe the claims of the ’252 patent without a license or permission from UEI.

64. Amazon has infringed multiple claims of the ’252 patent, including independent claim 7. By way of example only, the normal and customary use of Amazon’s products made, used, sold, offered for sale and/or imported by Amazon infringes an

⁸⁶ See <https://www.amazon.com/b?ie=UTF8&node=21576558011> (last visited August 6, 2026).

⁸⁷ See <https://www.amazon.com/Alexa-App/b?ie=UTF8&node=18354642011> (last visited August 6, 2026).

1 exemplary claim of the '252 patent, as set forth in **Exhibit F**, which UEI provides without
2 the benefit of information about the Accused Instrumentalities, which include the Amazon
3 Echo, Echo Dot, Echo Pop, Echo Spot, and Echo Show.

4 65. Amazon also knowingly and intentionally induces and contributes to
5 infringement of the '252 patent in violation of 35 U.S.C. §§ 271(b) and 271(c). For
6 example, Amazon has had knowledge of or was willfully blind to the '252 patent and the
7 infringing nature of the Accused Instrumentalities at least as of the filing date of this
8 lawsuit.

9 66. Despite its knowledge of the '252 patent, Amazon has induced, and continues
10 to induce, infringement of the '252 patent by actively encouraging others (including its
11 customers) to use, offer to sell, sell, and import the Accused Instrumentalities. On
12 information and belief, these acts include providing information and instructions on the use
13 of the Accused Instrumentalities; providing information, education and instructions to its
14 customers; and providing the Accused Instrumentalities to customers. Amazon does so
15 knowing and intending that its customers will commit these infringing acts. Amazon also
16 continues to make, use, offer for sale, sell, and/or import the Accused Instrumentalities,
17 despite their knowledge of the '252 patent, thereby specifically intending for and inducing
18 its customers to infringe the '252 patent through its customers' normal and customary use
19 of the Accused Instrumentalities. Accordingly, Amazon has been, and currently is,
20 contributorily infringing the '252 patent in violation of 35 U.S.C. § 271(b).

21 67. Amazon has also infringed, and continues to infringe, the '252 patent because
22 it has made, used, sold, offered for sale and/or imported the Accused Instrumentalities,
23 which are used in the practicing the patent claims and constitute a material part of the
24 invention. Amazon is aware that the components of the Accused Instrumentalities, and the
25 Accused Instrumentalities themselves, are especially made or especially adapted for use in
26 infringement of the patent, not a staple article or commodity of commerce suitable for
27 substantial non-infringing use. Accordingly, Amazon has been, and currently is,
28 contributorily infringing the '252 patent in violation of 35 U.S.C. § 271(c).

68. UEI has been damages by Amazon's infringement of the '252 patent and is entitled to damages as provided for in 35 U.S.C. § 284, including reasonable royalty damages.

COUNT TWO

INFRINGEMENT OF U.S. PATENT NO. 11,676,480

69. UEI re-alleges and incorporates by reference all of the foregoing paragraphs.

70. UEI is the owner of the '480 patent with full rights to pursue recovery of royalties for damages for infringement, including full rights to recover past and future damages.

71. The specification of the '480 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

72. UEI has satisfied any requirements of 35 U.S.C. § 287(a) with respect to the '480 patent, and UEI is entitled to damages for Amazon's past infringement.

73. Amazon has directly infringed (literally and under the doctrine of equivalents) the '480 patent by making, using, selling, offering for sale, or importing products that infringe the claims of the '480 patent and by inducing others to infringe the claims of the '480 patent without a license or permission from UEI.

74. Amazon has infringed multiple claims of the '480 patent, including independent claim 1. By way of example only, the normal and customary use of Amazon's products made, used, sold, offered for sale and/or imported by Amazon infringes an exemplary claim of the '480 patent, as set forth in **Exhibit G**, which UEI provides without the benefit of information about the Accused Instrumentalities, which include the Fire TV Stick 4K, Fire TV Stick, Fire TV Stick Lite, Fire TV Stick 4K Max, Fire TV Cube, Fire TV Alexa Voice Remote Pro, and Fire TV Alexa Voice Remote.

1 75. Amazon also knowingly and intentionally induces and contributes to
2 infringement of the '480 patent in violation of 35 U.S.C. §§ 271(b), 271(c), and 271(f). For
3 example, Amazon has had knowledge of or was willfully blind to the '480 patent and the
4 infringing nature of the Accused Instrumentalities at least as of the filing date of this
5 lawsuit.

6 76. Despite its knowledge of the '480 patent, Amazon has induced, and continues
7 to induce, infringement of the '480 patent by actively encouraging others (including its
8 customers) to use, offer to sell, sell, and import the Accused Instrumentalities. On
9 information and belief, these acts include providing information and instructions on the use
10 of the Accused Instrumentalities; providing information, education and instructions to its
11 customers; and providing the Accused Instrumentalities to customers. Amazon does so
12 knowing and intending that its customers will commit these infringing acts. Amazon also
13 continues to make, use, offer for sale, sell, and/or import the Accused Instrumentalities,
14 despite their knowledge of the '480 patent, thereby specifically intending for and inducing
15 its customers to infringe the '480 patent through its customers' normal and customary use
16 of the Accused Instrumentalities. Accordingly, Amazon has been, and currently is,
17 contributorily infringing the '480 patent in violation of 35 U.S.C. § 271(b).

18 77. Amazon has also infringed, and continues to infringe, the '480 patent because
19 it has made, used, sold, offered for sale and/or imported the Accused Instrumentalities,
20 which are used in the practicing the patent claims and constitute a material part of the
21 invention. Amazon is aware that the components of the Accused Instrumentalities, and the
22 Accused Instrumentalities themselves, are especially made or especially adapted for use in
23 infringement of the patent, not a staple article or commodity of commerce suitable for
24 substantial non-infringing use. Accordingly, Amazon has been, and currently is,
25 contributorily infringing the '480 patent in violation of 35 U.S.C. § 271(c).

26 78. Amazon has further infringed, and continues to infringe, the '480 patent
27 because, on information and belief, Amazon has, among other things, supplied or caused
28 to be supplied in or from the United States, without license or authority, products or

1 components of products that are combined and/or used outside the United States in a
2 manner that falls within the scope of one or more claims of the '480 Patent including
3 without limitation the Accused Instrumentalities falling within the scope of one or more
4 claims of the '480 patent.

5 79. UEI has been damages by Amazon's infringement of the '480 patent and is
6 entitled to damages as provided for in 35 U.S.C. § 284, including reasonable royalty
7 damages.

8 **COUNT THREE**

9 **INFRINGEMENT OF U.S. PATENT NO. 11,102,538**

10 80. UEI re-alleges and incorporates by reference all of the foregoing paragraphs.

11 81. UEI is the owner of the '538 patent with full rights to pursue recovery of
12 royalties for damages for infringement, including full rights to recover past and future
13 damages.

14 82. The specification of the '538 patent describes in technical detail each
15 limitation of the claims, allowing a skilled artisan to understand the scope of the claims
16 and how the non-conventional and non-generic combination of claim limitations is patently
17 distinct from and improved upon what may have been considered conventional or generic
18 in the art at the time of the invention.

19 83. UEI has satisfied any requirements of 35 U.S.C. § 287(a) with respect to
20 the '538 patent, and UEI is entitled to damages for Amazon's past infringement.

21 84. Amazon has directly infringed (literally and under the doctrine of equivalents)
22 the '538 patent by making, using, selling, offering for sale, or importing products that
23 infringe the claims of the '538 patent and by inducing others to infringe the claims of
24 the '538 patent without a license or permission from UEI.

25 85. Amazon has infringed multiple claims of the '538 patent, including
26 independent claim 1. By way of example only, the normal and customary use of Amazon's
27 products made, used, sold, offered for sale and/or imported by Amazon infringes an
28 exemplary claim of the '538 patent, as set forth in **Exhibit H**, which UEI provides without

1 the benefit of information about the Accused Instrumentalities, which include the Fire TV
2 Stick, Fire TV Stick 4K, Fire TV Stick Lite, Fire TV Stick 4K Max, Fire TV Cube, and
3 Fire TV Stick HD Alexa Voice Remote.

4 86. Amazon also knowingly and intentionally induces and contributes to
5 infringement of the '538 patent in violation of 35 U.S.C. §§ 271(b), 271(c), and 271(f). For
6 example, Amazon has had knowledge of or was willfully blind to the '538 patent and the
7 infringing nature of the Accused Instrumentalities at least as of the filing date of this
8 lawsuit.

9 87. Despite its knowledge of the '538 patent, Amazon has induced, and continues
10 to induce, infringement of the '538 patent by actively encouraging others (including its
11 customers) to use, offer to sell, sell, and import the Accused Instrumentalities. On
12 information and belief, these acts include providing information and instructions on the use
13 of the Accused Instrumentalities; providing information, education and instructions to its
14 customers; and providing the Accused Instrumentalities to customers. Amazon does so
15 knowing and intending that its customers will commit these infringing acts. Amazon also
16 continues to make, use, offer for sale, sell, and/or import the Accused Instrumentalities,
17 despite their knowledge of the '538 patent, thereby specifically intending for and inducing
18 its customers to infringe the '538 patent through its customers' normal and customary use
19 of the Accused Instrumentalities. Accordingly, Amazon has been, and currently is,
20 contributorily infringing the '538 patent in violation of 35 U.S.C. § 271(b).

21 88. Amazon has also infringed, and continues to infringe, the '538 patent because
22 it has made, used, sold, offered for sale and/or imported the Accused Instrumentalities,
23 which are used in the practicing the patent claims and constitute a material part of the
24 invention. Amazon is aware that the components of the Accused Instrumentalities, and the
25 Accused Instrumentalities themselves, are especially made or especially adapted for use in
26 infringement of the patent, not a staple article or commodity of commerce suitable for
27 substantial non-infringing use. Accordingly, Amazon has been, and currently is,
28 contributorily infringing the '538 patent in violation of 35 U.S.C. § 271(c).

1 89. Amazon has further infringed, and continues to infringe, the '538 patent
2 because, on information and belief, Amazon has, among other things, supplied or caused
3 to be supplied in or from the United States, without license or authority, products or
4 components of products that are combined and/or used outside the United States in a
5 manner that falls within the scope of one or more claims of the '538 Patent including
6 without limitation the Accused Instrumentalities falling within the scope of one or more
7 claims of the '538 patent.

8 90. UEI has been damages by Amazon's infringement of the '538 patent and is
9 entitled to damages as provided for in 35 U.S.C. § 284, including reasonable royalty
10 damages.

11 **COUNT FOUR**

12 **INFRINGEMENT OF U.S. PATENT NO. 11,575,534**

13 91. UEI re-alleges and incorporates by reference all of the foregoing paragraphs.

14 92. UEI is the owner of the '534 patent with full rights to pursue recovery of
15 royalties for damages for infringement, including full rights to recover past and future
16 damages.

17 93. The specification of the '534 patent describes in technical detail each
18 limitation of the claims, allowing a skilled artisan to understand the scope of the claims
19 and how the non-conventional and non-generic combination of claim limitations is patently
20 distinct from and improved upon what may have been considered conventional or generic
21 in the art at the time of the invention.

22 94. UEI has satisfied any requirements of 35 U.S.C. § 287(a) with respect to
23 the '534 patent, and UEI is entitled to damages for Amazon's past infringement.

24 95. Amazon has directly infringed (literally and under the doctrine of equivalents)
25 the '534 patent by making, using, selling, offering for sale, or importing products that
26 infringe the claims of the '534 patent and by inducing others to infringe the claims of
27 the '534 patent without a license or permission from UEI.
28

1 96. Amazon has infringed multiple claims of the '534 patent, including
2 independent claim 1. By way of example only, the normal and customary use of Amazon's
3 products made, used, sold, offered for sale and/or imported by Amazon infringes an
4 exemplary claim of the '534 patent, as set forth in **Exhibit I**, which UEI provides without
5 the benefit of information about the Accused Instrumentalities, which include the Alexa
6 App and running on Echo products.

7 97. Amazon also knowingly and intentionally induces and contributes to
8 infringement of the '534 patent in violation of 35 U.S.C. §§ 271(b) and 271(c). For
9 example, Amazon has had knowledge of or was willfully blind to the '534 patent and the
10 infringing nature of the Accused Instrumentalities at least as of the filing date of this
11 lawsuit.

12 98. Despite its knowledge of the '534 patent, Amazon has induced, and continues
13 to induce, infringement of the '534 patent by actively encouraging others (including its
14 customers) to use, offer to sell, sell, and import the Accused Instrumentalities. On
15 information and belief, these acts include providing information and instructions on the use
16 of the Accused Instrumentalities; providing information, education and instructions to its
17 customers; and providing the Accused Instrumentalities to customers. Amazon does so
18 knowing and intending that its customers will commit these infringing acts. Amazon also
19 continues to make, use, offer for sale, sell, and/or import the Accused Instrumentalities,
20 despite their knowledge of the '534 patent, thereby specifically intending for and inducing
21 its customers to infringe the '534 patent through its customers' normal and customary use
22 of the Accused Instrumentalities. Accordingly, Amazon has been, and currently is,
23 contributorily infringing the '534 patent in violation of 35 U.S.C. § 271(b).

24 99. Amazon has also infringed, and continues to infringe, the '534 patent because
25 it has made, used, sold, offered for sale and/or imported the Accused Instrumentalities,
26 which are used in the practicing the patent claims and constitute a material part of the
27 invention. Amazon is aware that the components of the Accused Instrumentalities, and the
28 Accused Instrumentalities themselves, are especially made or especially adapted for use in

1 infringement of the patent, not a staple article or commodity of commerce suitable for
2 substantial non-infringing use. Accordingly, Amazon has been, and currently is,
3 contributorily infringing the '534 patent in violation of 35 U.S.C. § 271(c).

4 100. Amazon has further infringed, and continues to infringe, the '534 patent
5 because, on information and belief, Amazon has, among other things, supplied or caused
6 to be supplied in or from the United States, without license or authority, products or
7 components of products that are combined and/or used outside the United States in a
8 manner that falls within the scope of one or more claims of the '534 Patent including
9 without limitation the Accused Instrumentalities falling within the scope of one or more
10 claims of the '534 patent.

11 101. UEI has been damages by Amazon's infringement of the '534 patent and is
12 entitled to damages as provided for in 35 U.S.C. § 284, including reasonable royalty
13 damages.

14 **COUNT FIVE**

15 **INFRINGEMENT OF U.S. PATENT NO. 11,032,598**

16 102. UEI re-alleges and incorporates by reference all of the foregoing paragraphs.

17 103. UEI is the owner of the '598 patent with full rights to pursue recovery of
18 royalties for damages for infringement, including full rights to recover past and future
19 damages.

20 104. The specification of the '598 patent describes in technical detail each
21 limitation of the claims, allowing a skilled artisan to understand the scope of the claims
22 and how the non-conventional and non-generic combination of claim limitations is patently
23 distinct from and improved upon what may have been considered conventional or generic
24 in the art at the time of the invention.

25 105. UEI has satisfied any requirements of 35 U.S.C. § 287(a) with respect to
26 the '598 patent, and UEI is entitled to damages for Amazon's past infringement.

27 106. Amazon has directly infringed (literally and under the doctrine of equivalents)
28 the '598 patent by making, using, selling, offering for sale, or importing products that

1 infringe the claims of the '598 patent and by inducing others to infringe the claims of
2 the '598 patent without a license or permission from UEI.

3 107. Amazon has infringed multiple claims of the '598 patent, including
4 independent claim 1. By way of example only, the normal and customary use of Amazon's
5 products made, used, sold, offered for sale and/or imported by Amazon infringes an
6 exemplary claim of the '598 patent, as set forth in **Exhibit J**, which UEI provides without
7 the benefit of information about the Accused Instrumentalities, which include the Prime
8 Video Mobile App.

9 108. Amazon also knowingly and intentionally induces and contributes to
10 infringement of the '598 patent in violation of 35 U.S.C. §§ 271(b) and 271(c). For
11 example, Amazon has had knowledge of or was willfully blind to the '598 patent and the
12 infringing nature of the Accused Instrumentalities at least as of the filing date of this
13 lawsuit.

14 109. Despite its knowledge of the '598 patent, Amazon has induced, and continues
15 to induce, infringement of the '598 patent by actively encouraging others (including its
16 customers) to use, offer to sell, sell, and import the Accused Instrumentalities. On
17 information and belief, these acts include providing information and instructions on the use
18 of the Accused Instrumentalities; providing information, education and instructions to its
19 customers; and providing the Accused Instrumentalities to customers. Amazon does so
20 knowing and intending that its customers will commit these infringing acts. Amazon also
21 continues to make, use, offer for sale, sell, and/or import the Accused Instrumentalities,
22 despite their knowledge of the '598 patent, thereby specifically intending for and inducing
23 its customers to infringe the '598 patent through its customers' normal and customary use
24 of the Accused Instrumentalities. Accordingly, Amazon has been, and currently is,
25 contributorily infringing the '598 patent in violation of 35 U.S.C. § 271(b).

26 110. Amazon has also infringed, and continues to infringe, the '598 patent because
27 it has made, used, sold, offered for sale and/or imported the Accused Instrumentalities,
28 which are used in the practicing the patent claims and constitute a material part of the

1 invention. Amazon is aware that the components of the Accused Instrumentalities, and the
2 Accused Instrumentalities themselves, are especially made or especially adapted for use in
3 infringement of the patent, not a staple article or commodity of commerce suitable for
4 substantial non-infringing use. Accordingly, Amazon has been, and currently is,
5 contributorily infringing the '598 patent in violation of 35 U.S.C. § 271(c).

6 111. UEI has been damages by Amazon's infringement of the '598 patent and is
7 entitled to damages as provided for in 35 U.S.C. § 284, including reasonable royalty
8 damages.

9 **PRAYER FOR RELIEF**

10
11 WHEREFORE, UEI respectfully requests judgment against Amazon as follows:

12 A. That this Court determine that Amazon, to the extent not enjoined, has
13 infringed and continues to infringe the Asserted Patents and that the Asserted Patents are
14 valid and enforceable;

15
16 B. that this Court enter an injunction prohibiting Amazon and its agents, officers,
17 servants, employees, and all persons in active concert or participation with Amazon from
18 deploying, operating, maintaining, testing, and using the Accused Instrumentalities, and
19 from otherwise infringing any of the Asserted Patents;

20
21 C. that this Court ascertain and award UEI damages under 35 U.S.C. § 284
22 sufficient to compensate for Amazon's infringement, including but not limited to
23 infringement occurring before the filing of this lawsuit;

24
25 D. that this Court ascertain and award UEI any post-judgment ongoing royalties
26 under 35 U.S.C. § 284 as may be appropriate;

1 E. that this Court award UEI any applicable prejudgment and post-judgment
2 interest;

3 F. that this Court enter a finding that this case is exceptional under 35 U.S.C. §
4 285, and an award of UEI's reasonable attorney's fees and costs; and
5

6 G. that this Court award UEI such other relief at law or in equity as the Court
7 deems just and proper.
8

9 **JURY DEMAND**

10 UEI requests that all claims and causes of action raised in this Complaint against
11 Amazon be tried to a jury to the fullest extent possible.
12

13 Dated: August 6, 2026

Respectfully Submitted,

14
15 /s/Stefan Szpajda

16 Stefan Szpajda (SBN 282322)
17 C. Maclain Wells (SBN 221609)
18 Sam Kim (SBN 282582)
19 Cliff Win, Jr. (SBN 270517)
20 **FOLIO LAW GROUP PLLC**
21 1200 Westlake Ave. N. Ste. 809
22 Seattle, WA 98109
23 Tel: (206) 809-6809
24 stefan@foliolaw.com
25 maclain@foliolaw.com
26 sam.kim@foliolaw.com
27 cliff.win@foliolaw.com

28 David Stein (SBN 198256)
OLSON STEIN LLP
240 Nice Lane #301
Newport Beach, CA 92663
Tel: (949) 887-4600
dstein@olsonstein.com

Attorneys for Plaintiff
Universal Electronics Inc.