

UEI's Infringement Contentions and Asserted Claims Regarding Infringement of U.S. Patent No. 5,255,313 By Logitech, Inc., Logitech International S.A., and Logitech Europe S.A.

'313 Patent Claim	Logitech's Accused Systems, Products and/or Services
<p>Claim 1</p> <p>. A universal remote control system including</p>	<p>Logitech's manufacture, sale, offer for sale, and use in the United States and importation into the United States of certain remote controls and related technology, including but not limited to the following accused systems, products and services: Harmony H300, H650, H700, H900, One, and H1100 remote controls, associated software and hardware, programming and data available on cd, Logitech's website and/or from Logitech's database, and any similar products and related technology, constitutes infringement of at least Claims 1, 2, and 20 of the '313 Patent under 35 U.S.C. § 271 (a), (b), and (c).</p> <p>More specifically, Logitech infringes Claims 1, 2, and 20 of the '313 Patent under § 271 (a) through its manufacture, importation, use, operation, configuration, control, and testing of its Harmony H300, H650, H700, H900, One, and H1100 remote controls, associated software and hardware, programming and data available on cd, Logitech's website and/or from Logitech's database, and any similar products and related technology.</p> <p>Logitech also infringes Claims 1, 2, and 20 of the '313 Patent under § 271 (b) and (c) through its sale and offer to sell in the United States, Harmony H300, H650, H700, H900, One, and H1100 remote controls, to customers or users along with instructions and associated software and hardware, programming and data for use, activation, set-up, and operation of its Harmony H300, H650, H700, H900, One, and H1100 remote controls. Logitech's actions constitute active inducement of infringement of Claims 1, 2, and 20 of the '313 Patent by these users and also constitute contributory infringement insofar as Logitech offers to sell and sells within the United States, and/or imports into the United States, a component of a patented machine, manufacture, combination, or composition, or a material or apparatus for use in practicing a patented process claimed in Claims 1, 2, and 20 of the '313 Patent, which constitutes a material part of the claimed process, knowing the same to be especially made or especially adapted for use in an infringement of Claims 1, 2, and 20 of the '313 Patent, and not a staple article or commodity of commerce suitable for substantial noninfringing use. Such instructions and associated software, programming and data include guides, manuals and applications on how to use, activate, set-up, and operate the Harmony H300, H650, H700, H900, One, and H1100 remote controls, that is provided with the remote controls in written form or on a cd or other medium, and any guides, instructions and associated software, programming and data available online on Logitech's website at www.logitech.com. In turn, the users of the Harmony H300, H650, H700, H900, One, and H1100 remote controls who use, activate, set-up, and operate such infringing technology, infringe Claims 1, 2, and 20 of the '313 Patent under § 271 (a).</p>

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'313 Patent Claim	Logitech's Accused Systems, Products and/or Services
Claim 1	<p style="text-align: center;"><u>Logitech Harmony 300 Universal Remote</u></p> <p>“Logitech® Harmony® 300 Remote.” (H300 Quick-start Guide, UE015160.) The Harmony 300 makes it easy to sit back and enjoy better control of your entertainment devices.” (H300 Quick-start Guide, UE015166.)</p> <p>“Simple online setup. Just connect your remote to your computer. Find your devices from a simple software menu. Download a full set of commands into your remote. No more codes you can't find. No more buttons that don't work.” (H300 Packaging, UE015159.)</p> <p style="text-align: center;"><u>Logitech Harmony 650 Universal Remote</u></p> <p>“The Harmony 650 is an Activity-based infrared (IR) universal remote control” (H650 User Manual, p. 4, UE015344.)</p> <p>“Works with 5000+ brands Our online library includes more than 225,000 devices—and the list grows every day. So your remote is never out of date.” (H650 Packaging, UE015138.)</p> <p style="text-align: center;"><u>Logitech Harmony 700 Universal Remote</u></p> <p>“The Harmony 700 is an Activity-based infrared (IR) universal remote control.” (H700 User Manual, p. 1, UE015381.)</p> <p>“Yes it works with your system How can you be sure? Harmony already supports more than 5,000 brands and 225,000 devices. And with more added every day, you'll be covered tomorrow, too.” (H700 Packaging, UE015085.)</p> <p style="text-align: center;"><u>Logitech Harmony 900 Universal Remote</u></p> <p>“The Harmony 900 is an Activity-based universal remote control.” (H900 User Manual, p. 6.)</p>

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Claim 1	<p> "It's possible that a device's commands may not be recognized. Maybe you have a very rare device? Or a new one? Although we update our device list regularly, there are always new devices in the market. To remedy this, you can teach your Harmony how to control this device by using the device's original remote." (H900 User Manual, p. 35, UE054467.) </p> <p style="text-align: center;"> <u>Logitech Harmony One Universal Remote</u> </p> <p> "The Harmony One is an Activity-based infrared (IR) universal remote control." (One User Manual, p. 4, UE015456.) </p> <p> "From Betamax to Blu-ray™ and beyond Harmony already works with more than 5,000 brands and 225,000 devices. And our library of home entertainment devices grows every day. So, you can be sure your remote will work with what you own today and what you add tomorrow." (One Packaging, UE015180.) </p> <p style="text-align: center;"> <u>Logitech Harmony 1100 Universal Remote</u> </p> <p> "The Harmony 1100 is an Activity-based infrared (IR) universal remote control." (H1100 User Manual, p. 5, UE015407.) </p> <p> "It's possible that a device's commands are not recognized by your Harmony 1100. Maybe you have a very rare device? Or a new one? Although we update our device list regularly, there are always new devices in the market. To remedy this, you can teach your Harmony remote how to control this device by using the device's original remote." (H1100 User Manual, p. 26, UE015428.) </p>
computer having a memory,	<p> <i>The computer or server that houses Logitech's database of IR code data is a computer having a memory.</i> IR code data that corresponds to a particular controlled device is downloadable from the Logitech database of IR code data onto each of the Accused Products, the H300, H650, H700, H900, One, and H1100 universal remote. </p> <p> <i>Additionally, the local computer to which Harmony remotes attach is also a computer having a</i> </p>

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Claim 1	<p><i>memory.</i> The IR code data is stored in the local computer memory's during the remote set-up and configuration process.</p> <p style="text-align: center;"><u>Logitech Harmony 300 Universal Remote</u></p> <p>“Simple online setup. Just connect your remote to your computer. Find your devices from a simple software menu. Download a full set of commands into your remote. No more codes you can't find. No more buttons that don't work.” (H300 Packaging, UE015159.)</p> <p style="text-align: center;"><u>Logitech Harmony 650 Universal Remote</u></p> <p>“Works with 5000+ brands Our online library includes more than 225,000 devices—and the list grows every day. So your remote is never out of date.” (H650 Packaging, UE015138.)</p> <p style="text-align: center;"><u>Logitech Harmony 700 Universal Remote</u></p> <p>“Yes it works with your system How can you be sure? Harmony already supports more than 5,000 brands and 225,000 devices. And with more added every day, you'll be covered tomorrow, too.” (H700 Packaging, UE015085.)</p> <p style="text-align: center;"><u>Logitech Harmony 900 Universal Remote</u></p> <p>“It's possible that a device's commands may not be recognized. Maybe you have a very rare device? Or a new one? Although we update our device list regularly, there are always new devices in the market. To remedy this, you can teach your Harmony how to control this device by using the device's original remote.” (H900 User Manual, p. 35, UE054467.)</p> <p style="text-align: center;"><u>Logitech Harmony One Universal Remote</u></p> <p>“From Betamax to Blu-ray™ and beyond Harmony already works with more than 5,000 brands and 225,000 devices. And our library of home entertainment devices grows every day. So, you can be sure</p>

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Claim 1	<p>your remote will work with what you own today and what you add tomorrow.” (One Packaging, UE015180.)</p> <p style="text-align: center;"><u>Logitech Harmony 1100 Universal Remote</u></p> <p>“It’s possible that a device’s commands are not recognized by your Harmony 1100. Maybe you have a very rare device? Or a new one? Although we update our device list regularly, there are always new devices in the market. To remedy this, you can teach your Harmony remote how to control this device by using the device’s original remote.” (H1100 User Manual, p. 26, UE015428.)</p> <p>Further, each of the Accused Products meets this limitation under the doctrine of equivalents, applying the plain and ordinary meaning of the phrase “a computer having a memory,” at least because any corresponding structure used by the Accused Products performs the same function as the claimed computer having a memory, in the same way, to achieve the same result.</p>
<p>code data for creating appropriate infrared (IR) lamp driver instructions for causing an infrared signal generator to emit infrared signals which will cause specific functions to occur in a specific controlled device, for operating a variety of devices to be controlled, stored in said memory of said computer,</p>	<p><i>The Accused Products, Harmony H300, H650, H700, H900, One, and H1100 remotes, associated software and hardware, programming and data available on cd, Logitech's website and/or from Logitech's database, and any similar products and related technology, have code data for creating appropriate infrared (IR) lamp driver instructions for causing an infrared signal generator to emit infrared signals which will cause specific functions to occur in a specific controlled device, for operating a variety of devices to be controlled, stored in said memory of said computer.</i></p> <p>Logitech stores IR code data in the memory of a computer or server (referred to above as Logitech’s database of IR code data). IR code data may be accessed and downloaded through the Harmony software onto each of the Accused Products, the H300, H650, H700, H900, One, and H1100 universal remote control systems. As further noted above, a local computer stores, IR code data in memory during the remote set-up and configuration process. After the IR code data is downloaded onto the Harmony remote, the remote can then emit infrared signals corresponding to the downloaded IR code data to cause specific functions to occur in a specific controlled device. Further, each Accused Product can control more than one device.</p> <p style="text-align: center;"><u>Logitech Harmony 300 Universal Remote</u></p>

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