

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

iROBOT CORPORATION,)	
)	
Plaintiff)	
)	
v.)	
)	Civil Action No.
SHARKNINJA OPERATING LLC,)	
SHARKNINJA MANAGEMENT LLC,)	JURY TRIAL DEMANDED
SHARKNINJA MANAGEMENT CO.,)	
SHARKNINJA SALES CO., EP MIDCO)	
LLC)	
)	
Defendants.)	

COMPLAINT

Plaintiff iRobot Corporation (“iRobot” or “Plaintiff”), by and through its attorneys, for its Complaint against Defendants SharkNinja Operating LLC, SharkNinja Management LLC, SharkNinja Management Company, SharkNinja Sales Company, and EP Midco (collectively, “Shark” or “Defendants”), hereby alleges as follows.

NATURE OF THE ACTION

1. This is an action arising under the patent laws of the United States, 35 U.S.C. § 271, *et seq.* to end Defendants’ unauthorized and infringing importation, offer for sale, sale, distribution, and/or use of products incorporating Plaintiff iRobot’s patented inventions.
2. Under the Patent Act, iRobot seeks to enjoin infringement and obtain damages resulting from Defendants’ unauthorized manufacture, use, sale, and/or offer to sell within the United States and/or importation into the United States of products that infringe one or more claims of United States Patent Nos. 7,571,511 (“the ’511 patent”), 9,884,423 (“the ’423 patent”), 10,296,007 (“the ’007 patent”), 10,813,517 (“the ’517 patent”), and 10,835,096 (“the ’096 patent”), (collectively, “the patents-in-suit”). iRobot seeks permanent injunctive relief to prevent

Defendants from continuing to infringe the patents-in-suit. In addition, iRobot seeks monetary damages, including treble damages, resulting from Defendants' direct, indirect, and willful infringement of the patents-in-suit.

3. This action is related to Plaintiff iRobot's recently filed complaint in the International Trade Commission (ITC) pursuant to 19 U.S.C. § 1337(d). iRobot has filed the present Complaint in this Court as a companion proceeding to the ITC case in accordance with customary ITC practice, given that this Court has authority to afford relief such as money damages that the ITC does not. As such, and as is also customary, this action could be stayed without opposition by iRobot pending the completion of the ITC action upon a proper and timely request by the Defendants in this action (all of whom are proposed Respondents in the ITC complaint). *See* 28 U.S.C. § 1659(a).

4. Defendants import, offer for sale, sell, distribute, and/or use in the United States infringing products ("Accused Products"), and encourage others to use the Accused Products in an infringing manner. The Accused Products consist of Shark's ION-series, IQ-series, and AI-series robotic floor cleaners ("RFCs"). The IQ-series has two primary variants: the standard IQ Robot ("IQ") and an auto-empty version ("IQ-AE"). The AI-series has two primary variants: the standard AI Robot ("AI") and a "wet-dry" version that also has mopping capability ("AI-WD").

PARTIES

5. Plaintiff iRobot Corporation is a corporation organized under the laws of the State of Delaware and has its principal place of business at 8 Crosby Drive, Bedford, MA 01730.

6. On information and belief, Defendant SharkNinja Operating LLC is a limited liability company organized and existing under the laws of the State of Delaware and has its principal place of business at 89 A Street, Suite 100, Needham, MA 02494.

7. On information and belief, Defendant SharkNinja Management LLC is a limited liability company duly organized and existing under the laws of the State of Delaware and has its principal place of business at 89 A Street, Suite 100, Needham MA 02494.

8. On information and belief, Defendant SharkNinja Management Company is a company duly organized and existing under the laws of the State of Delaware and has its principal place of business at 89 A Street, Suite 100, Needham MA 02494.

9. On information and belief, Defendant SharkNinja Sales Company is a company duly organized and existing under the laws of the State of Delaware and has its principal place of business at 89 A Street, Suite 100, Needham MA 02494.

10. On information and belief, Defendant EP Midco LLC is a limited liability company duly organized and existing under the laws of the State of Delaware and has its principal place of business at 89 A Street, Suite 100, Needham MA 02494.

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

12. Defendants are subject to personal jurisdiction in this district because Defendants have their principal place of business in this district. Further, Defendants regularly transact business in this district by, among other things, making, using, selling, or offering to sell products to customers located in this district.

13. Venue in this district is proper under 28 U.S.C. §§ 1391(b) and (c) and 1400(b) because, Defendants have committed acts of infringement and have a regular and established place of business in this district.

FACTUAL BACKGROUND

14. iRobot's passion for innovation has been unflagging since its founding three decades ago. In 1990, three engineers from the Massachusetts Institute of Technology's Artificial Intelligence Lab founded iRobot (formerly IS Robotics, Inc.). In its early years, iRobot principally researched and developed robotic technologies for security, exploration, environmental, and military applications. Its creations made history. iRobot's first product, a six-legged robot designed for space exploration, now resides at the Smithsonian Air & Space Museum in Washington, D.C. Its other early robots explored the Great Pyramid of Giza, discovered harmful subsea oil in the Gulf of Mexico, and were the first self-navigating FDA-approved remote presence robots for hospitals.

15. In the early 2000s, iRobot turned its attention to improving consumer electronics, including by launching its revolutionary Roomba® RFCs, forging a path for an entirely new category in home cleaning. Since then, iRobot has become the undisputed leader in the domestic RFC market segment, and its products have won widespread applause. To date, iRobot has sold more than 30 million home robots worldwide. In May 2020, Popular Mechanics recognized the Roomba® i7 as the "Best Robot Vacuum." Ex. 8. In September 2020, Vacuum Wars named the Roomba® 675 as a winner in the "Budget Robots Category," and named the Roomba® i7+ as a winner in the "Premium Robot Category." Ex. 9. Those and other iRobot RFCs have earned dozens more "Editor's Choice," "Reader's Choice," and "Best of" accolades over the past several years, including, in 2018, Time's Invention of the Year for the Roomba® i7+. Ex. 6; *see also* Exs. 7-10.

16. iRobot's groundbreaking technologies are key to its leadership of the market segment. Owners of iRobot RFCs spend less time cleaning by hand themselves, or even thinking about cleaning. Certain iRobot RFCs can autonomously create a map of the floor of a home,

identify where they are on the map during cleaning missions, and let owners review the maps and customize them for optimal cleaning.



17. Some iRobot RFCs augment these functionalities by allowing users to select particular rooms, zones, or hot spots for cleaning (for example, under the dining table).



18. When certain iRobot RFCs sense a need to recharge during a cleaning mission, they can navigate to a docking station in the home to recharge, then resume the mission—all without the need for human intervention.

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