

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

ASSA ABLOY AB,	:	
ASSA ABLOY Inc.,	:	
ASSA ABLOY Residential Group, Inc.,	:	
August Home, Inc.,	:	
HID Global Corporation, and	:	Civil Action No. 3:22-cv-694
ASSA ABLOY Global Solutions, Inc.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
CPC Patent Technologies Pty. Ltd., and	:	Demand for Jury Trial
Charter Pacific Corporation Ltd.	:	
	:	
Defendants.	:	
	:	

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**COMPLAINT FOR DECLARATORY JUDGMENT  
OF PATENT NON-INFRINGEMENT**

1. The above-named Plaintiffs (collectively, the “ASSA ABLOY Entities”), hereby allege against CPC Patent Technologies Pty. Ltd. (“CPC”) and Charter Pacific Corporation Ltd. (“Charter Pacific Corp.”) (collectively, “Charter Pacific”) on personal knowledge as to their own activities and on information and belief as to the activities of others as follows:

**NATURE OF THE ACTION**

2. This is a declaratory judgment action arising under the Declaratory Judgment Act, 28 U.S.C. § 2201, § 2202, and the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.* The ASSA ABLOY Entities seek a declaration of non-infringement of U.S. Patent Nos. 9,269,208 (“the ’208 Patent”), 9,665,705 (“the ’705 Patent”), and 8,620,039 (“the ’039 Patent”) (collectively, the “Patents-in-Suit”).

3. The ASSA ABLOY Entities bring this action to resolve the conflict between Charter Pacific and the ASSA ABLOY Entities regarding the Patents-in-Suit. A judicial declaration is necessary to determine the respective rights of the parties regarding the Patents-in-Suit, and the ASSA ABLOY Entities respectfully seek a judicial declaration that the Patents-in-Suit are not infringed by any of their market offerings, including products, platforms, and/or services.

### **THE PARTIES**

4. Plaintiff ASSA ABLOY AB is a company organized under the laws of Sweden with its principal place of business at Klarabergsviadukten 90, Stockholm, 111 64, Sweden.

5. Plaintiff ASSA ABLOY Inc. is an Oregon Corporation with its principal place of business located at 110 Sargent Drive, New Haven, Connecticut 06511.

6. Plaintiff ASSA ABLOY Residential Group, Inc. (“Yale”) is a California corporation with its principal place of business located at 110 Sargent Drive, New Haven, CT 06511.

7. Plaintiff August Home, Inc. (“August”) is a Delaware corporation with its principal place of business located at 657 Bryant Street, San Francisco, CA 94107.

8. Plaintiff HID Global Corporation (“HID”) is a Delaware corporation with its principal place of business located at 611 Center Ridge Drive, Austin, TX 78753.

9. Plaintiff ASSA ABLOY Global Solutions, Inc. (“Hospitality”) is a Texas corporation with its principal place of business located at 631 International Parkway, Suite 100 Richardson, Texas 75081.

10. ASSA ABLOY AB is the parent company of several entities worldwide, that are leaders in the delivery of secure identity solutions for millions of customers throughout the world. ASSA ABLOY AB is the ultimate parent company of ASSA ABLOY Inc.

11. ASSA ABLOY Inc. is the main holding entity for ASSA ABLOY AB's North and South American assets. ASSA ABLOY Inc. is therefore the immediate parent company of Yale, August, HID, and Hospitality, and the New Haven, CT headquarters of ASSA ABLOY Inc. is a registered address for each of these entities.

12. ASSA ABLOY AB is the ultimate parent company of Yale, August, HID, and Hospitality by virtue of its ownership of ASSA ABLOY Inc.

13. Each ASSA ABLOY Entity named as a Plaintiff shares a corporate relationship with the other named ASSA ABLOY Entities and each individual Plaintiff has a unique role in the operations that lead to the making and selling of products, platforms, and/or services provided by Yale, August, HID, and Hospitality to customers in the United States. By virtue of the related nature of the above-named Plaintiffs and the facts alleged herein, a case or controversy has arisen between Charter Pacific and each of the ASSA ABLOY Entities as to whether any of the ASSA ABLOY Entities have infringed any asserted valid and enforceable claim of the Patents-in-Suit. Therefore, this declaratory judgment action seeks to resolve Charter Pacific's patent infringement allegations with respect to all above-named Plaintiffs.

14. The ASSA ABLOY family of brands provides identity solutions used in a variety of applications, including physical access control, logical access control, access card printing and personalization, highly secure government identification, and commercial and residential opening solutions. These products, solutions, and services are sold through a well-established network of OEMs, developers, systems integrators, and distributors worldwide. End users of

these products, solutions, and services include businesses and organizations in virtually all industry sectors, including government, healthcare, retail, industrial, commercial, consumer, airports, ports, finance, and education.

15. Yale protects millions of homes and businesses worldwide and is the brand behind locks of every design and function in over 125 countries. Yale products have been helping people to secure their favorite belongings since 1840. As one of the oldest international brands, Yale is among the best-known and most respected names in the lock industry. Yale offers a broad portfolio of door hardware and locks to secure both homes and businesses.

16. August is the leading provider of smart locks and smart home access products and services. August's products and services give customers total control over the front door from a smartphone.

17. August unveiled the August Smart Lock in May 2013. The August Smart Lock attaches to existing deadbolts on the inside of the door. Since its debut, August's technology has advanced to become the most intelligent, secure way for consumers to manage access to their homes. August pairs its August Smart Lock with its August Home software solution.

18. On December 5, 2017, ASSA ABLOY Inc. completed its acquisition of August. In a press release, ASSA ABLOY Inc. announced “[t]he company sees opportunities to leverage the strengths of the two teams and already have a project underway to bring August Access technology to the Yale lock platforms and see many more product opportunities in the future.” The December 5, 2017, Press Release is available at <https://www.yalehome.com/us/en/stories/news/assa-abloy-completes-acquisition-of-august-home--collaboration-commences>.

19. HID is a worldwide leader in trusted identity solutions. Its products range from physical access control products, like ID cards and readers for opening doors, to solutions for accessing digital networks, verifying transactions, and tracking assets. Millions of people around the world use HID products and services to navigate their everyday lives, and over 2 billion things are connected through HID technology. HID Global has over 3,000 employees worldwide and operates international offices that support more than 100 countries.

20. Hospitality similarly provides advanced electronic locking and access solutions to hotels, cruise ships, construction, critical infrastructure, education, senior care, and multi-family residential industries worldwide. Hospitality has been an industry pioneer and global brand for over forty years, with more than 5,000 employees globally.

21. HID and Hospitality offer the HID Mobile Access and ASSA ABLOY Mobile Access software solutions, respectively. Each allows an individual's mobile device (e.g., smartphone or wearable) to be used to gain access to secured doors, gates, networks, services, and more. For example, a user with employee badges or hotel keys in an Apple Wallet can unlock their doors with an iPhone or Apple Watch.

22. HID also provides physical access control products that incorporate biometric authentication, allowing customers to incorporate two-factor authentication for additional security, or use biometric authentication alone to obviate the need to carry a mobile or physical credential.

23. Upon information and belief, defendant CPC is an Australian corporation having its principal place of business located at Level 1, 18 Tedder Avenue, Main Beach, Queensland 4217, Australia.

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