

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

_____	x
	:
RYAN KLEBBA, on behalf of himself and	:
others similarly situated,	:
	:
Plaintiff,	:
	:
v.	:
	:
NETGEAR, INC.,	:
	:
Defendant.	:
_____	x

Civil Action No. 1:18-cv-438
CLASS ACTION COMPLAINT
Jury Trial Demanded

Nature of Action

1. During the stressful and hectic period following the birth of a child, the most important concern of new parents is the safety of their newborn.

2. To ensure as much, while trying to obtain a few hours of sleep, many parents purchase baby monitors to keep an eye—and an ear—on their hopefully-sleeping baby.

3. Attempting to capitalize on this, Netgear, Inc. (“Netgear”) released a baby monitor, the Arlo Baby, in approximately May 2017, that promised an “all-in-one” baby monitoring experience, capable of video and audio monitoring, along with a host of other features, from night lights to music playing capability.

4. A particular feature of the Arlo Baby that Netgear touted was its ability to let consumers monitor their children “anywhere, anytime,” and to “always stay connected to the most important things in your life, even when you can’t be where they are.”¹

¹ <https://www.arlo.com/en-us/products/arlo-baby/Default.aspx> (last visited April 30, 2018).

5. To do so, parents could connect the Arlo Baby to a Wi-Fi network so that its video and audio feeds could be tapped from any number of devices—computers, cellular telephones, tablets—also connected to the internet

6. This sort of flexibility ostensibly offered a wider range of uses as compared to traditional baby monitors, and thereby commanded a higher price.

7. Another critical feature of the Arlo Baby that Netgear advertised was the ability to combine it with Netgear's proprietary companion tablet, to be released in Summer 2017.

8. According to Netgear, the companion tablet promised the unique ability to stream the Arlo Baby to the tablet without an internet connection, thereby allowing consumers to monitor their baby away from Wi-Fi networks like a traditional baby monitor.

9. However, unbeknownst to consumers who purchased the Arlo Baby, Netgear was unwilling or unable to release its proprietary tablet, thereby depriving consumers of the ability to use the Arlo Baby without an active internet connection.

10. And, greatly compounding Netgear's failure to release the companion tablet, the Arlo Baby simply did not work.

11. Indeed, countless consumer complaints point out that the Arlo Baby frequently disconnects and fails to reconnect without manual intervention, leaving the baby monitor unable to perform the single task it was designed to do: provide continuous monitoring of babies while the parents attempted to sleep in a different room.

12. This left purchasers of the Arlo Baby with little more than a frustrating paperweight, capable of sporadic and unreliable monitoring with less functionality than a conventional baby monitor available for one-tenth of the price of the Arlo Baby.

Parties

13. Ryan Klebba (“Klebba”) is a natural person who at all relevant times resided in Travis County, Texas.

14. Klebba purchased an Arlo Baby on or about August 25, 2017.

15. Netgear is a publicly traded corporation headquartered in San Jose, California, and incorporated in Delaware.

16. Netgear “is a global networking company that delivers innovative products to consumers, businesses and service providers. Netgear’s products are built on a variety of proven technologies such as wireless (WiFi and LTE), Ethernet, and powerline, with a focus on reliability and ease-of-use. Netgear’s product line consists of wired and wireless devices that enable networking, broadband access, and network connectivity.”²

17. Upon information and belief, Netgear disseminated the misrepresentations and advertisements at issue from its headquarters in California.

Jurisdiction and Venue

18. This Court has subject matter jurisdiction over this action under the Class Action Fairness Act, 28 U.S.C. § 1332(d), because, upon information and good faith belief, there are more than 100 members of the proposed classes, some members of the proposed classes and Netgear are citizens of different states, and the amount in controversy exceeds \$5 million.

19. This Court has personal jurisdiction over Netgear because Netgear has sufficient minimum contacts with Texas such that the exercise of jurisdiction by this Court over Netgear is consistent with notions of fair play and substantial justice.

² See <https://investor.netgear.com/overview/default.aspx> (last visited April 30, 2018).

20. Netgear conducts business in Texas and otherwise avails itself of the protections and benefits of Texas law through the promotion, marketing, and sale of the Arlo Baby in Texas; and this action arises out of or relates to these contacts.

21. Moreover, Netgear's wrongful conduct, as described herein, foreseeably affects consumers in Texas.

22. Venue is proper before this Court under 28 U.S.C. § 1391(b), as a substantial part of the events giving rise to the claim occurred in this District, and a substantial part of the property that is the subject of the action is situated in this District.

Factual Allegations

I. Netgear announced and began advertising the Arlo Baby around May 2017.

23. Netgear's Arlo business line, focused on connected, "smart" security systems, has been a noteworthy growth driver in Netgear's recent financial success, driving triple-digit growth from 2016 to 2017³ and continuing to grow through 2018.⁴

24. Around May 2017, to continue Arlo's precipitous growth, Netgear announced the release of the Arlo Baby, a baby monitor variant of the popular Arlo line of video and camera monitoring products sold by Netgear.

25. Netgear described the Arlo Baby as a revolutionary "smart" baby monitor, capable of a host of "smart" features—such as the ability to play music or operate as a night light—in addition to its core functionality of video and audio monitoring of babies.

³ <https://www.fool.com/investing/2017/07/27/netgear-inc-crushes-it-on-arlo-demand.aspx> (last visited April 30, 2018).

⁴ https://s22.q4cdn.com/334267776/files/doc_presentations/2018/Netgear_Earnings-Presentation-1Q18-Final.pdf (last visited April 30, 2018).

26. Specifically, the Arlo Baby was advertised with the following features:⁵

Never Miss a Moment



High Definition Video

Watch your baby in clear 1080p HD video, day or night, from anywhere.



Night Vision

See your baby's every move, even in the dark.



2-Way Talk

Listen in & talk to your baby, straight from your smartphone.



Music Player

Soothe your baby to sleep each night with built-in lullabies.



Air Sensors

Monitor your nursery's air condition, including temperature & humidity.



Multi-Colored Night Light

Provides your nursery with warm, dimmable ambient lighting.



Motion and Sound Alerts

Know when your baby is active or crying with smart alerts.



Rechargeable Battery

Monitor anywhere around your home without having to plug it in.

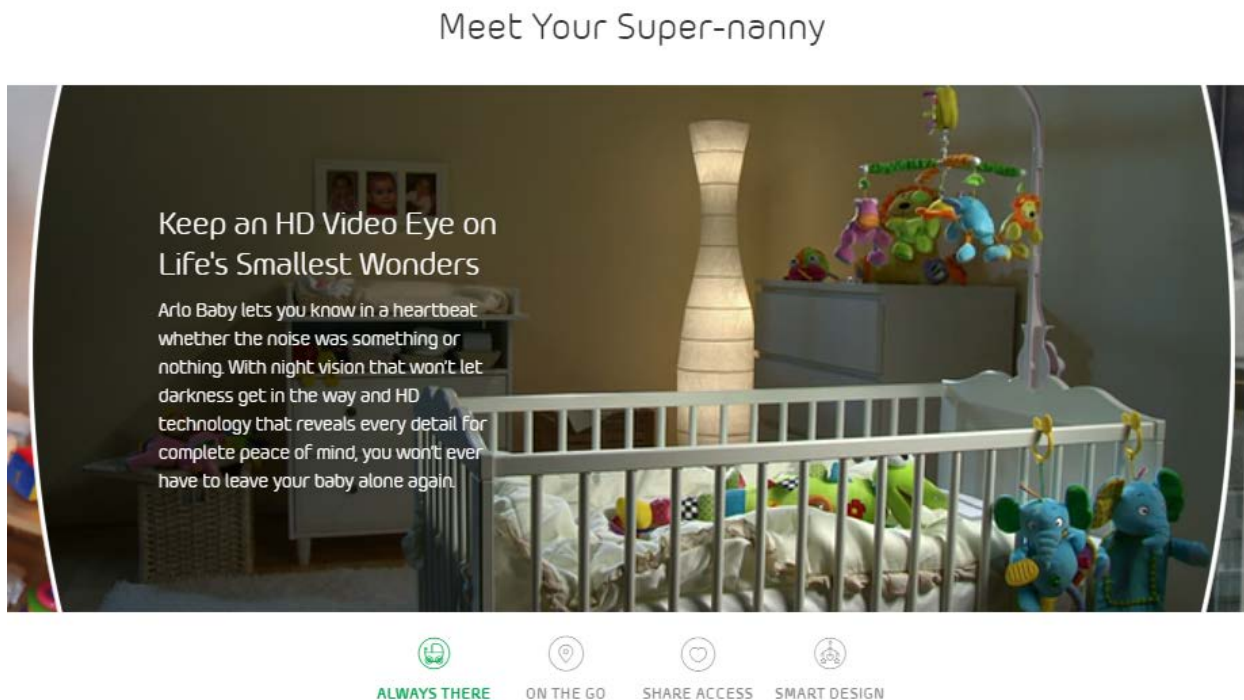


Accessories

Additional Arlo Baby character accessories sold separately.

⁵ https://www.arlo.com/en-us/images/documents/arlo_baby_datasheet.pdf (last visited April 30, 2018).

27. Netgear provided a number of additional related advertisements, promising reliable connectivity, and—at bottom—a functional baby monitor:⁶



28. Netgear also advertised that the Arlo Baby would allow consumers to “[a]lways stay connected to the most important things in your life, even when you can’t be where they are.”⁷

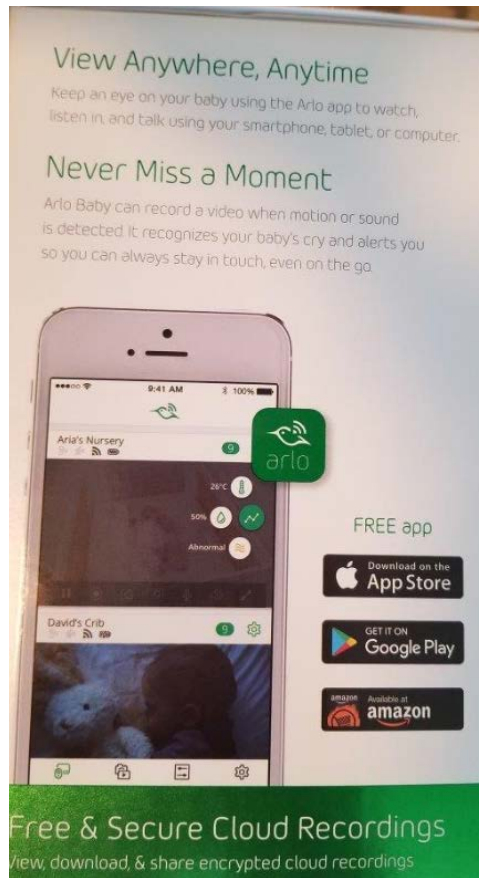
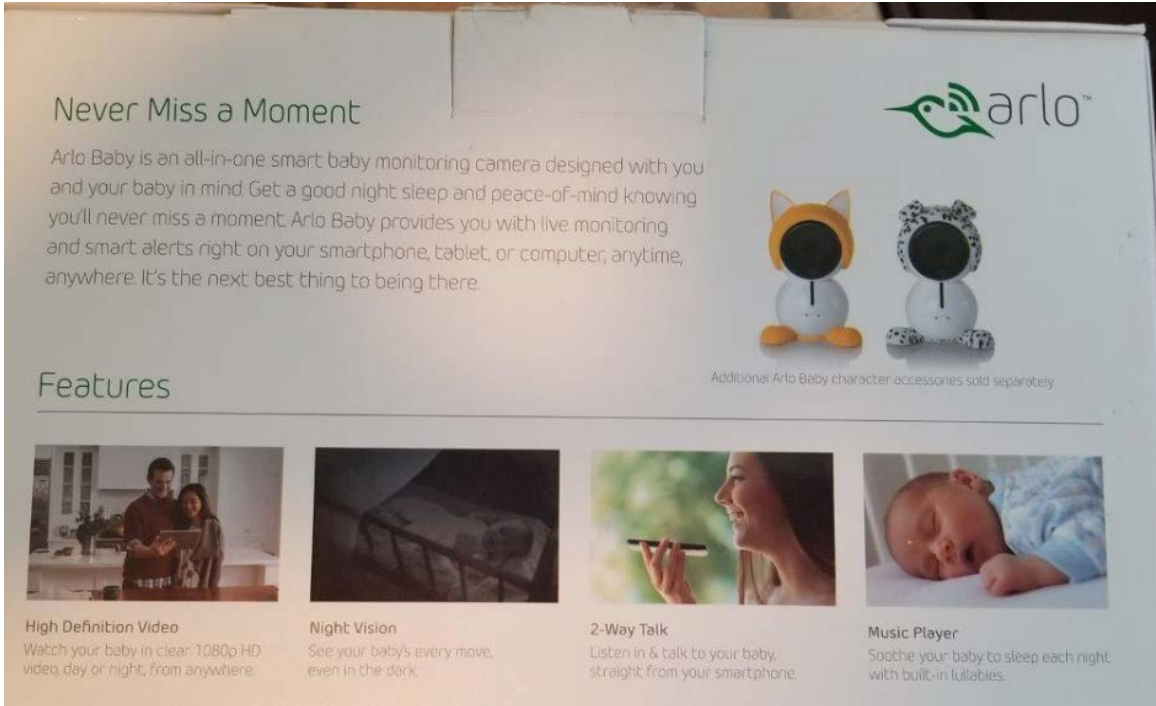
29. Netgear further added: “Arlo Baby is an all-in-one smart baby monitoring camera designed with you and your baby in mind. Get a good night sleep and peace-of-mind knowing you’ll never miss a moment.”⁸

⁶ <https://www.arlo.com/en-us/products/arlo-baby/Default.aspx> (last visited April 30, 2018).

⁷ *Id.*

⁸ *Id.*



30. Similar statements adorned every Arlo Baby box:



31. All of these features served to differentiate the Arlo Baby from traditional baby monitors, in that the Arlo Baby allowed consumers to use the monitor remotely from a host of internet-connected devices, while traditional monitors typically require a corresponding receiver device to connect to the monitor without an internet connection.

32. And, to accompany the Arlo Baby and negate any potential problems with using an internet-dependent baby monitor, Netgear heavily promoted a companion tablet that it promised as “an excellent addition to your Arlo Baby camera, providing a more focused, uninterrupted monitoring experience of your baby. With this display, the camera can be used even when an Internet connection is not available, so you can take Arlo Baby wherever you go.”⁹

33. Other related advertisements included:

Arlo Baby 7" Touchscreen Display (ABD1000)


Coming Soon

MSRP \$99.99

Description

The Arlo Baby Display is designed for an uninterrupted baby monitoring experience, so you can use your smartphone for other tasks. With this large 7" touchscreen display, the Arlo Baby camera can also be used offline, without the need for an internet connection, just like a traditional baby monitor. Take the Arlo Baby camera and display anywhere you want and still enjoy many of the available smart features even when a WiFi connection is not available.

Designed for:


[Arlo Baby](#)

What's Included:

- (1) Arlo Baby 7" Touchscreen Display
- (1) Power adapter & cable
- (1) Arlo logo decal
- (1) Quick Start Guide
- Camera NOT included

⁹ https://www.arlo.com/en-us/images/documents/arlo_baby_datasheet.pdf (last visited April 30, 2018).

34. And Netgear even heavily promoted the tablet to investors, featuring the Arlo Baby and the companion tablet side-by-side in the announcement of the Arlo Baby's release:¹⁰

...and Arlo Baby

The next best thing to being there!

- Smart Music Player
- Smart Multi-Colored Night Light
- Air Sensors
- Intelligent Motion and Sound Alerts
- 7" display that connects directly to the camera
- Battery operation mode for when away from home



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https://s22.q4cdn.com/334267776/files/doc_financials/quarterly/2017/q2/Netgear_IR_Presentation_Q217_-_Final_v3.pdf (last visited April 30, 2018).

35. In fact, each and every Arlo Baby box contained a brochure promoting the companion tablet as a critical component, necessary to use the Arlo Baby as a traditional baby monitor whenever internet connections were unavailable or unreliable:



36. Once the Arlo Baby was released, in the second quarter of 2017, Netgear's Arlo division continued to experience significant growth, from 4 million cameras shipped¹¹ to over 7.5 million cameras shipped in Netgear's most recent fiscal quarter.¹²

¹¹

https://s22.q4cdn.com/334267776/files/doc_financials/quarterly/2017/q2/Netgear_IR_Presentation_Q217_-_Final_v3.pdf (last visited April 30, 2018).

¹² https://s22.q4cdn.com/334267776/files/doc_presentations/2018/Netgear_Earnings-Presentation-1Q18-Final.pdf (last visited April 30, 2018).

II. The Arlo Baby fails to perform as advertised.

37. Klebba's experience with the Arlo Baby—replicated and repeated by consumers across the country—is illustrative of the failure of the device to perform as advertised.

38. In particular, Klebba purchased an Arlo Baby in August 2017 for \$244 at amazon.com in anticipation of the birth of his twin babies, who were born in November 2017.

39. The price Klebba paid was a significant premium over other competing baby monitors, costing several times as much as many more traditional monitors.

40. Some time in September 2017, Klebba set up the Arlo Baby in his nursery and experimented with its functionality, where he rapidly realized that the video and audio monitoring features of the Arlo Baby were unreliable and ineffective, and prone to extended bouts of heavy pixelization and static.

41. At bottom, using the Arlo Baby over an internet connection appeared to strain its core functionality beyond the level at which it could operate.

42. On September 26, 2017, Klebba attempted to return the Arlo Baby through Amazon, but was informed by Amazon that he was one day outside of the 30-day return period, and his request was denied.

43. Nevertheless, in November 2017, after bringing his newborn babies home, Klebba attempted to use the Arlo Baby as a baby monitor, and continued to experience difficulty, prompting a discussion with Netgear's tech support staff, who ultimately offered to send him a replacement for his original Arlo Baby, which Klebba accepted in hopes that it would resolve the connection issues he experienced.

44. This exchange, however, did not resolve any of Klebba's issues with the Arlo Baby's poor visual quality and frequent disconnects.

45. On December 7, 2017, after persistent and repeated discussion with Netgear's tech support employees, Klebba was advised by Netgear's Level 2 Support Expert—the next-level support staff beyond the front-line tech support employees—that the Arlo Baby was unable to maintain a consistent connection with the video monitoring feature active, and that continual monitoring of his babies could only be reliably maintained if Klebba used audio monitoring exclusively.

46. Then, on December 15, 2017, Klebba experienced the most egregious failure of the Arlo Baby yet.

47. He had begun sleep training with his babies, intending to allow his babies to cry for a period of time before intervening and soothing them back to sleep, relying on the Arlo Baby's monitoring to determine when he, his wife, or his au pair had to intervene.

48. By chance, at 2:00 that morning, Klebba's wife woke up and heard that their babies were crying, and determined that this had been ongoing for approximately two hours.¹³

49. Klebba and his wife were shocked by the realization that their babies were unattended and in potential danger for hours, all because the Arlo Baby was unable to maintain a connection and, once disconnected, failed to reconnect automatically—despite disabling video monitoring and using exclusively audio monitoring, as suggested by Netgear.

50. In short, the Arlo Baby required regular and continuous supervision, and manual intervention to reconnect the monitoring device—entirely defeating its most basic purpose.

¹³ This length of time was confirmed by Klebba's au pair, who was instructed not to intervene when they were crying that night and to leave that to the discretion of Klebba or his wife because they were sleep training their babies, and through notifications from the Arlo Baby device that did not transmit due to the Arlo Baby disconnecting.

51. After that incident, Klebba purchased a conventional 2.4-ghz wireless audio baby monitor for approximately \$20, which never disconnected during his entire use of that product.

52. But despite the earlier failures of the Arlo Baby, Klebba continued to attempt to troubleshoot and fix the device with Netgear's technical support team.

53. These efforts were, at one point on February 7, 2018, met with an admission from Netgear that the frequent disconnects of the Arlo Baby were a problem that Netgear was aware of, and that its "engineers are still currently working on a fix for this."¹⁴

54. Importantly, Klebba reviewed Netgear's advertisements and product description pages for the Arlo Baby prior to purchasing the product, and he purchased the Arlo Baby in reliance on Netgear's assertions that the Arlo Baby could maintain a stable connection to ensure the safety of his babies.

55. Klebba would not have purchased the Arlo Baby if he had known that the Arlo Baby was unable to function reliably as a baby monitor due to its frequent disconnects and failures.

56. Klebba's frustration with the Arlo Baby was not unique to him, as countless other consumers have voiced their complaints with the Arlo Baby being incapable of performing its core task—allowing parents to monitor babies without constant active supervision.¹⁵

¹⁴ Excerpt of Netgear Tech Support Log, attached as Exhibit A.

¹⁵ See, e.g., https://www.reddit.com/r/Parenting/comments/8bqzei/arlo_baby_sucks_alternatives/ (last visited April 30, 2018); <https://www.apple.com/shop/reviews/HLGM2VC/A/arlo-baby-1080p-hd-monitoring-camera-by-netgear> (last visited April 30, 2018); <https://community.netgear.com/t5/Arlo-Baby/Intermittent-Arlo-Baby-Camera-Disconnections/td-p/1286080/page/2> (last visited April 30, 2018); <https://community.netgear.com/t5/Arlo-Baby/Arlo-Baby-firmware-update-and-connectivity-issues/m-p/1524792> (last visited April 30, 2018).

57. Examples of recent purchaser reviews—among dozens—illuminate these flaws:¹⁶

★☆☆☆☆ Do not buy!

By Christopher Ream on May 1, 2018

Verified Purchase

I am giving this one star as the product has toooo many glitches. It Lags while loading, it lags during "live" video. My daughter started fussing on the camera meanwhile I heard a thump (no thump on the camera), she fell. If the camera did not loose connection I would have been able to catch my daughter before she fell. Mind you I was 15 feet away.

Helpful

Not Helpful

1 comment

Report abuse

★☆☆☆☆ Far too expensive to have issues like constantly disconnecting

By Ethan Handel on April 25, 2018

Verified Purchase

Far too expensive to have issues like constantly disconnecting. Needs to be reset every other day in order to begin functioning again. Unreliable as a baby monitor. Every other wifi device on my network works perfectly, this device just has shoddy quality. Using latest firmware and app.

Helpful

Not Helpful

1 comment

Report abuse

★☆☆☆☆ VERY UNRELIABLE, DO NOT BUY SKIP

By TomTom on April 19, 2018

Verified Purchase

VERY UNRELIABLE, DO NOT BUY SKIP

I have to rest this thing every 1/2 days because the connectivity on the cam itself crashes and needs a hard reboot. SKIP, DO NOT BUY SKIP, WASTE OF MONEY BUY A YI CAM INSTEAD FOR 1/4 of the price
Been waiting for a few months for updates and nothing has fixed it, an access point was added specifically for this monitor and it still has issues. SKIP, issues with ios/android/windows

Helpful

Not Helpful

1 comment

Report abuse

★☆☆☆☆ Unreliable Baby Monitor

By y2ka_53 on April 15, 2018

Highly unreliable baby monitor. I did all the updates and checked the wifi but still issues persisted. I tried to hold out as long as I could but it got to a point that my wife & I decided to give-up on the Arlo Baby camera and purchase a traditional baby monitor. I don't understand how Netgear, a major security camera company, could sell such a product. It just comes down to safety and you need a reliable baby monitor as parents. The features are great when they work but unfortunately I think the technology is just not there yet to be reliable.

Examples of issues as follows:

- 1) Whilst monitor is on the volume suddenly cuts out and if you don't actually check the screen you are unaware
- 2) Suddenly the connection is lost without warning even though there is no issue with the wifi
- 3) Upon start-up, the camera inexplicably disconnected from your monitoring device / app.

58. Thus, actual consumer experience deviates dramatically from Netgear's advertisements and warranties regarding the functionality of the Arlo Baby, including that the Arlo Baby enables consumers to "Never Miss a Moment," "Always stay connected to the most important things in your life, even when you can't be where they are," and "Arlo Baby lets you know in a heartbeat whether the noise was something or nothing. With night vision that won't let

¹⁶ https://www.amazon.com/NETGEAR-ABC1000-100NAS-Arlo-Baby-by/product-reviews/B071RD1KSN/ref=cm_cr_dp_d_btm?ie=UTF8&reviewerType=all_reviews&sortBy=recent#R2E2ZM3I44HDM7 (last visited May 1, 2018).

darkness get in the way and HD technology that reveals every detail for complete peace of mind, you won't ever have to leave your baby alone again.”¹⁷

59. Accordingly, the Arlo Baby—despite being advertised as a baby monitor—was, and remains, unable to reliably perform the single most important task for which it is sold, which is to provide a continuous monitor of babies to allow their supervisors peace of mind that the baby is not entirely unsupervised, even when they are physically separated.

60. The fact that the Arlo Baby cannot maintain a reliable monitoring connection, and that it requires manual user intervention to reconnect after it initially disconnects, defeats the entire purpose of purchasing a baby monitor, and it ultimately underperformed the conventional baby monitor that Klebba purchased for less than one tenth of the Arlo Baby's price.

61. Despite these issues—and Netgear's occasional acknowledgement of them—Netgear has refused to refund consumers' purchases of the Arlo Baby.

III. Netgear unceremoniously cancelled the Arlo Baby companion tablet.

62. In part to potentially remove some of the reliability and connectivity problems associated with the Arlo Baby's use over an internet connection, Netgear promised and advertised that it would release a companion tablet to allow the Arlo Baby to function as a traditional baby monitor without the need for an active wireless internet connection.

63. Yet despite print and electronic advertisements stating that the companion tablet would be released in “Summer 2017,” that summer came and went without the tablet's release, and communications to customers were limited.

¹⁷ See *supra* Factual Allegations § I.

64. On August 23, 2017, a customer service representative for Netgear stated that “[t]he latest information I have on target availability is Quarter 3 of 2017 (Months of July, August, September). I do not have any official release information at this time.”¹⁸

65. Then, on September 15, 2017, the same customer service representative advised Klebba that the release of the Arlo Baby companion tablet was going to be delayed, “as further development work needs to be done to bring the product’s performance to a level that we believe will satisfy our users’ expectations.”¹⁹

66. And then, on March 14, 2018, after months of silence, Netgear announced that the Arlo Baby companion tablet was being cancelled, and instead offered a lackluster consolation to frustrated consumers:

We wanted to let you know that we no longer plan to release a dedicated display monitor. Instead, we are offering people who bought an Arlo Baby a \$30 coupon for an Amazon Fire HD 8 Tablet (16GB, With Special Offers), redeemable on Amazon.com. We think this tablet is a great alternative to the Arlo Baby Touchscreen Display. It works great with the Arlo app, offers great image and audio quality, and is Alexa-enabled so you can take advantage of the voice control capability offered by Amazon Alexa. If you would like to take advantage of this offer, please reach out to the Arlo Customer Support team. Please be prepared to provide your name, email address, and your Arlo Baby serial number/MAC address which can be found under the camera. Once our team has been able to verify your ownership of an Arlo Baby camera, we will respond to you with a one-time use coupon. This offer is only available to owners of Arlo Baby cameras registered before March 31, 2018.²⁰

67. Consumer outrage was pointed and immediate, including:

No.

Just no.

I don’t need another tablet. I don’t want another tablet.

¹⁸ Netgear Support Forum, *Arlo Baby and Dedicate Touch Screen Monitor*, attached as Exhibit B, at 10.

¹⁹ *Id.* at 20.

²⁰ *Id.* at 54.

What I want is what was promised - a dedicated monitor that connects to the Arlo Baby that circumvents having to connect through wi-fi. Wi-fi is imperfect and susceptible to any weak link in the process - Arlo hardware, phone/tablet hardware, ISP speed and reliability. What this tablet was to do is make the Arlo Baby reliable. And now you're telling me is that I have to rely on a safety device that cannot ensure that reliability.

I want a full refund of your product. Please contact me to set that up immediately.²¹

* * *

I do not accept a \$30 coupon. If that is the only solution, it should be for the full cost of the tablet. I bought this with the promise of a direct connect monitor. I do not want it on wifi.

I want a full refund for the camera. Please let me know how to do this.²²

* * *

Not very satisfied at the moment. Considering I am burning out my iPad Pro with constant monitoring and connection is lost at least twice a week through WiFi. I am really regretting this purchase. I have been waiting for at least a year if not more to be told sorry it's not going to happen?²³

68. In short, instead of being able to use the Arlo Baby as a “traditional baby monitor” with the companion tablet, Netgear merely offered a coupon for a small portion of the price of a conventional Amazon Fire tablet, which still requires an internet connection to operate, thus obviating the benefits of the originally promised companion tablet.

69. What the advertised companion tablet was to offer—a direct communications link to the Arlo Baby to bypass an internet connection—no third-party tablet like an Amazon Fire or Apple iPad could possibly offer.

²¹ *Id.* at 56.

²² *Id.* at 57.

²³ *Id.* at 59.

70. Without a unique hardware option from Netgear (*i.e.*, the companion tablet), the Arlo Baby is entirely dependent on an internet connection—which, in the real world, has proven to be a glaring weakness of the product.

71. And, despite numerous consumer complaints and requests for a refund or workable device that could operate without an active internet connection—as originally advertised—Netgear refused to compensate or assist consumers further, depriving them of the ability to use the Arlo Baby as a “traditional baby monitor.”

72. Further exacerbating this problem, Netgear continues to list the companion tablet for sale as an available purchase in its product data sheet on the Arlo Baby website.²⁴

73. Had Klebba known that Netgear had no intention of producing the Arlo Baby companion tablet, enabling him to use the Arlo Baby as a “traditional baby monitor,” he would not have purchased the Arlo Baby.

Class Allegations

74. Klebba brings this action as a class action under Federal Rules of Civil Procedure 23(a) and 23(b)(3) on behalf of the following classes:

Nationwide Class: All residents of the United States who purchased an Arlo Baby.

Texas Class: All residents of the State of Texas who purchased an Arlo Baby.

75. Excluded from the classes are Netgear, its officers and directors, members of their immediate families and their legal representatives, heirs, successors, or assigns, and any entity in which Netgear has or had controlling interests.

²⁴ https://www.arlo.com/en-us/images/documents/arlo_baby_datasheet.pdf (last visited April 30, 2018).

76. The proposed classes satisfy Rule 23(a)(1) because, upon information and belief, the class members are so numerous that joinder of all of them is impracticable.

77. The exact number of class members is unknown to Klebba at this time and can only be determined through appropriate discovery.

78. The proposed classes are ascertainable because they are defined by reference to objective criteria.

79. The proposed classes satisfy Rules 23(a)(2) and 23(a)(3) because Klebba's claims are typical of the claims of the members of the classes.

80. To be sure, the claims of Klebba and all members of the classes originate from the same conduct, practice, and procedure on the part of Netgear, and Klebba possesses the same interests and has suffered the same injuries as each member of the proposed classes.

81. Klebba satisfies Rule 23(a)(4) because he will fairly and adequately protect the interests of the members of the classes, and he has retained counsel experienced and competent in class action litigation.

82. Klebba has no interests that are irrevocably contrary to or in conflict with the members of the classes that he seeks to represent.

83. There will be little difficulty in the management of this action as a class action.

84. Issues of law and fact common to the members of the classes predominate over any questions that may affect only individual members, in that Netgear has acted on grounds generally applicable to the classes.

85. Among the issues of law and fact common to the classes are:

- a. Whether the Arlo Baby is of the same quality as baby monitors generally acceptable in the market;

- b. Whether the Arlo Baby is fit for the ordinary purposes for which the goods are used;
- c. Whether Netgear's conduct complied with its express warranties regarding the Arlo Baby;
- d. Whether Netgear's conduct complied with implied warranties regarding the Arlo Baby;
- e. Whether Netgear's advertisements regarding the functionality of the Arlo Baby were false or misleading;
- f. Whether Netgear's advertisements regarding the Arlo Baby companion tablet were false or misleading;
- g. Whether Netgear engaged in deceptive or unfair acts and practices in violation of California's False Advertising Law or Unfair Competition Law ("UCL");
- h. Whether Netgear's conduct injured the classes;
- i. Whether Netgear was unjustly enriched by its conduct;
- j. the availability of damages, punitive damages, and/or injunctive relief; and
- k. the availability of attorneys' fees and costs.

86. A class action is superior to all other available methods for the fair and efficient adjudication of this controversy since joinder of all members is impracticable.

87. Furthermore, as the damages suffered by individual members of the classes may be relatively small, the expense and burden of individual litigation make it impracticable for the members of the classes to individually redress the wrongs done to them.

88. As well, even for those class members who could afford to litigate such a claim, it would remain an economically impractical alternative.

89. In the alternative, the classes may also be certified because:
- a. the prosecution of separate actions by individual class members would create a risk of inconsistent or varying adjudication with respect to individual class members that would establish incompatible standards of conduct for Netgear;
 - b. the prosecution of separate actions by individual class members would create a risk of adjudications with respect to them that would, as a practical matter, be dispositive of the interests of other class members not parties to the adjudications, or substantially impair or impede their ability to protect their interests;
 - c. Netgear has acted or refused to act on grounds generally applicable to the classes thereby making appropriate final declaratory and/or injunctive relief with respect to the members of the classes as a whole; and/or
 - d. Certification of specific issues such as Netgear's liability is appropriate.

90. Adequate notice can be given to class members directly using information maintained in Netgear's records, records of its approved vendors, or through notice by publication.

Causes of Action

COUNT I BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY Tex. Bus. & Com. Code § 2.314 (On behalf of the Texas Class)

91. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

92. Klebba brings this claim on behalf of himself and the Texas Class.

93. Netgear was at all relevant times a "merchant" with respect to baby monitors under Tex. Bus. & Com. Code § 2.104(a), and a "seller" of baby monitors under § 2.103(a)(4).

94. The Arlo Baby was at all relevant times a “good” within the meaning of Tex. Bus. & Com. Code § 2.105(a).

95. A warranty that the Arlo Baby was in merchantable condition and fit for the ordinary purpose for which baby monitors are used is implied by law pursuant to Tex. Bus. & Com. Code § 2.314.

96. The Arlo Baby, when sold and at all times thereafter, was not in merchantable condition and is not fit for the ordinary purpose for which baby monitors are used.

97. Specifically, the Arlo Baby is inherently defective in that it cannot maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets; and the Arlo Baby was not adequately designed, manufactured, and tested.

98. The Arlo Baby’s ability to maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets is material—and critical—to Klebba and the members of the Texas class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

99. Netgear was provided notice of these issues by Klebba and by numerous individual consumer complaints, negative reviews, tech support requests, support forum discussions and communications sent by Klebba and others within a reasonable amount of time after the release of the Arlo Baby.

100. As a direct and proximate result of Netgear’s breach of the implied warranty of merchantability, Klebba and the other Texas class members have been damaged in an amount to be proven at trial.

COUNT II
BREACH OF IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE
Tex. Bus. & Com. Code § 2.315
(On behalf of the Texas Class)

101. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

102. Klebba brings this claim on behalf of himself and the Texas Class.

103. Netgear was at all relevant times a “merchant” with respect to baby monitors under Tex. Bus. & Com. Code § 2.104(a) and 2A.103(a)(20), and a “seller” of baby monitors under § 2.103(a)(4).

104. The Arlo Baby was at all relevant times a “good” within the meaning of Tex. Bus. & Com. Code § 2.105(a).

105. A warranty that the Arlo Baby was fit for the particular purpose for which the Arlo Baby is required and that the buyer is relying on Netgear’s skill or judgment to select or furnish suitable goods is implied by law pursuant to Tex. Bus. & Com. Code § 2.315.

106. The Arlo Baby, when sold and at all times thereafter, was not in merchantable condition and is not fit for the ordinary purpose for which baby monitors are used.

107. Specifically, the Arlo Baby is inherently defective in that it cannot maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets; and the Arlo Baby was not adequately designed, manufactured, and tested.

108. The Arlo Baby’s ability to maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets is material—and critical—to Klebba and the members of the class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

109. Netgear was provided notice of these issues by Klebba and by numerous individual consumer complaints, negative reviews, tech support requests, support forums discussions and communications sent by Klebba and others within a reasonable amount of time after the release of the Arlo Baby.

110. As a direct and proximate result of Netgear's breach of the implied warranty of fitness for a particular purpose, Klebba and the other Texas class members have been damaged in an amount to be proven at trial.

COUNT III
BREACH OF EXPRESS WARRANTY
Tex. Bus. & Com. Code § 2.313
(On behalf of the Texas Class)

111. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

112. Klebba brings this claim on behalf of himself and the Texas Class.

113. Netgear was at all relevant times a "merchant" with respect to baby monitors under Tex. Bus. & Com. Code § 2.104(a), and a "seller" of baby monitors under § 2.103(a)(4).

114. The Arlo Baby was at all relevant times a "good" within the meaning of Tex. Bus. & Com. Code § 2.105(a).

115. Netgear, through its advertisements and product labeling, expressly warranted that the Arlo Baby could function as a baby monitor, allowing consumers to "Never Miss a Moment," "Always stay connected to the most important things in your life, even when you can't be where they are," and that the "Arlo Baby lets you know in a heartbeat whether the noise was something or nothing. With night vision that won't let darkness get in the way and HD technology that reveals every detail for complete peace of mind, you won't ever have to leave your baby alone again."

116. Netgear additionally advertised and warranted that it would release a companion tablet to the Arlo Baby allowing a direct connection between the devices without requiring an active internet connection, thereby allowing the Arlo Baby to function as a “traditional baby monitor” for use when traveling, for example.

117. Affording Netgear an additional opportunity to cure their breached warranties would be futile, as Netgear has formally cancelled the release of the Arlo Baby’s companion tablet, and Netgear has received requests for refunds and complaints about the Arlo Baby’s performance that have been rejected or ignored for over six months.

118. In fact, Netgear continues to list the Arlo Baby companion tablet for sale on the product data sheet for the Arlo Baby.

119. Also, as alleged in more detail herein, at the time that Netgear sold the Arlo Baby, it knew that the Arlo Baby was inherently defective and did not conform to its warranties or advertised promises, and Netgear wrongfully concealed the defective nature of the Arlo Baby—as well as its intention to not release the companion tablet—from Klebba and the members of the class, who were therefore induced to purchase the Arlo Baby under false or fraudulent pretenses.

120. The Arlo Baby’s ability to maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets is material—and critical—to Klebba and the members of the Texas class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

121. Further, the Arlo Baby’s inability to function as a “traditional baby monitor” and Netgear’s decision to cancel the companion tablet is also material—and critical—to Klebba and the members of the Texas class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

122. Further still, replacement or repair will not remedy the issues with the Arlo Baby, and because of Netgear's failure to remedy the issues associated with the Arlo Baby, Klebba and the Texas class members seek damages or the revocation of the acceptance of the Arlo Baby and any incidental or consequential damages as allowed.

123. As a direct and proximate result of Netgear's breach of its express warranties, Klebba and the other Texas class members have been damaged in an amount to be proven at trial.

COUNT IV
BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY
Cal. Com. Code § 2.314
(On behalf of the Nationwide Class)

124. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

125. Klebba brings this claim on behalf of himself and the Nationwide Class.

126. Netgear was at all relevant times a "merchant" with respect to baby monitors under Cal. Com. Code § 2104(1), and a "seller" of baby monitors under § 2103(1)(d).

127. The Arlo Baby was at all relevant times a "good" within the meaning of Cal. Com. Code § 2105(1).

128. A warranty that the Arlo Baby was in merchantable condition and fit for the ordinary purpose for which baby monitors are used is implied by law pursuant to Cal. Com. Code § 2314.

129. The Arlo Baby, when sold and at all times thereafter, was not in merchantable condition and is not fit for the ordinary purpose for which baby monitors are used.

130. Specifically, the Arlo Baby is inherently defective in that it cannot maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without

requiring manual intervention and device resets; and the Arlo Baby was not adequately designed, manufactured, and tested.

131. The Arlo Baby's ability to maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets is material—and critical—to Klebba and the members of the class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

132. Netgear was provided notice of these issues by Klebba and by numerous individual consumer complaints, negative reviews, tech support requests, support forums discussions and communications sent by Klebba and others within a reasonable amount of time after the release of the Arlo Baby.

133. As a direct and proximate result of Netgear's breach of the implied warranty of merchantability, Klebba and the other class members have been damaged in an amount to be proven at trial.

COUNT V
BREACH OF IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE
Cal. Com. Code § 2.315
(On behalf of the Nationwide Class)

134. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

135. Klebba brings this claim on behalf of himself and the Nationwide Class.

136. Netgear was at all relevant times a “merchant” with respect to baby monitors under Cal. Com. Code § 2104(1), and a “seller” of baby monitors under § 2103(1)(d).

137. The Arlo Baby was at all relevant times a “good” within the meaning of Cal. Com. Code § 2105(1).

138. A warranty that the Arlo Baby was fit for the particular purpose for which the Arlo Baby is required and that the buyer is relying on Netgear's skill or judgment to select or furnish suitable goods is implied by law pursuant to Cal. Com. Code § 2315.

139. The Arlo Baby, when sold and at all times thereafter, was not in merchantable condition and is not fit for the ordinary purpose for which baby monitors are used.

140. Specifically, the Arlo Baby is inherently defective in that it cannot maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets; and the Arlo Baby was not adequately designed, manufactured, and tested.

141. The Arlo Baby's ability to maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets is material—and critical—to Klebba and the members of the class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

142. Netgear was provided notice of these issues by Klebba and by numerous individual consumer complaints, negative reviews, tech support requests, support forums discussions and communications sent by Klebba and others within a reasonable amount of time after the release of the Arlo Baby.

143. As a direct and proximate result of Netgear's breach of the implied warranty of fitness for a particular purpose, Klebba and the other class members have been damaged in an amount to be proven at trial.

COUNT VI
BREACH OF EXPRESS WARRANTY
Cal. Com. Code § 2.313
(On behalf of the Nationwide Class)

144. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

145. Klebba brings this claim on behalf of himself and the Nationwide Class.

146. Netgear was at all relevant times a “merchant” with respect to baby monitors under Cal. Com. Code § 2104(1), and a “seller” of baby monitors under § 2103(1)(d).

147. The Arlo Baby was at all relevant times a “good” within the meaning of Cal. Com. Code § 2105(1).

148. Netgear, through its advertisements and product labeling, expressly warranted that the Arlo Baby could function as a baby monitor, allowing consumers to “Never Miss a Moment,” “Always stay connected to the most important things in your life, even when you can’t be where they are,” and that the “Arlo Baby lets you know in a heartbeat whether the noise was something or nothing. With night vision that won’t let darkness get in the way and HD technology that reveals every detail for complete peace of mind, you won’t ever have to leave your baby alone again.”

149. Netgear additionally advertised and warranted that it would release a companion tablet to the Arlo Baby allowing a direct connection between the devices without requiring an active internet connection, thereby allowing the Arlo Baby to function as a “traditional baby monitor” for use when traveling, for example.

150. Affording Netgear an additional opportunity to cure their breached warranties would be futile, as Netgear has formally cancelled the release of the Arlo Baby’s companion tablet, and Netgear has received requests for refunds and complaints about the Arlo Baby’s performance that have been rejected or ignored for over six months.

151. In fact, Netgear continues to list the Arlo Baby companion tablet for sale on the product data sheet for the Arlo Baby.

152. Also, as alleged in more detail herein, at the time that Netgear sold the Arlo Baby, it knew that the Arlo Baby was inherently defective and did not conform to its warranties or advertised promises, and Netgear wrongfully concealed the defective nature of the Arlo Baby—as well as its intention to not release the companion tablet—from Klebba and the members of the class, who were therefore induced to purchase the Arlo Baby under false or fraudulent pretenses.

153. The Arlo Baby’s ability to maintain a reliable connection to allow consumers to monitor babies for a reasonable period of time without requiring manual intervention and device resets is material—and critical—to Klebba and the members of the class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

154. Further, the Arlo Baby’s inability to function as a “traditional baby monitor” and Netgear’s decision to cancel the companion tablet is also material—and critical—to Klebba and the members of the class, and they would not have purchased the Arlo Baby if they knew about its poor performance and inadequate design.

155. Further still, replacement or repair will not remedy the issues with the Arlo Baby, and because of Netgear’s failure to remedy the issues associated with the Arlo Baby, Klebba and the class members seek damages or the revocation of the acceptance of the Arlo Baby and any incidental or consequential damages as allowed.

156. As a direct and proximate result of Netgear’s breach of its express warranties, Klebba and the other class members have been damaged in an amount to be proven at trial.

COUNT VII
BREACH OF WRITTEN WARRANTY
PURSUANT TO THE MAGNUSON-MOSS WARRANTY ACT
15 U.S.C. § 2301, et seq.
(On behalf of the Nationwide Class)

157. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

158. Klebba brings this claim on behalf of himself and the Nationwide Class, or, in the alternative, on behalf of the Texas Class.

159. Klebba and the class members are “consumers” within the meaning of the Magnuson-Moss Warranty Act (“MMWA”), 15 U.S.C. § 2301.

160. Netgear is a “supplier” and “warrantor” within the meaning of § 2301.

161. The Arlo Baby is a “consumer product” within the meaning of § 2301.

162. Netgear made written warranties arising under state law regarding the Arlo Baby within the meaning of § 2301(6), for any non-conformities or defects in material or workmanship, comprising an undertaking in writing in connection with the purchase of the Arlo Baby to repair the Arlo Baby or take other remedial action free of charge to Klebba with respect to the Arlo Baby in the event that it failed to meet the specifications set forth therein.

163. Netgear’s warranties were the basis of the bargain of the contract between Klebba and Netgear for the sale of the Arlo Baby to Klebba.

164. Netgear has been afforded a reasonable opportunity to cure its breach of warranties.

165. The amount in controversy of Klebba’s and the class members’ individual claims meets or exceeds the sum of \$25.

166. The amount in controversy of this action exceeds the sum of \$50,000, exclusive of interest and costs, computed on the basis of all claims to be determined in this lawsuit.

167. Resorting to any informal dispute settlement procedure and/or affording Netgear another opportunity to cure these breaches of warranties is unnecessary and/or futile.

168. Any remedies available through any informal dispute settlement procedure would be inadequate under the circumstances, as Netgear has failed to remedy the problems associated with the Arlo Baby, and, as such, has indicated it has no desire to participate in such a process at this time.

169. Any requirement—whether under the MMWA or otherwise—that Klebba resort to an informal dispute resolution procedure and/or afford Netgear a reasonable opportunity to cure its breach of warranties is excused and thereby deemed satisfied.

170. As a direct and proximate result of Netgear’s breach of express warranties, Klebba and the members of the classes sustained damages and other losses in an amount to be determined at trial.

171. Netgear’s conduct damaged Klebba and the members of the classes, who are entitled to recover damages, consequential damages, diminution in value of the Arlo Baby, costs, attorneys’ fees, rescission, and/or other relief as appropriate, in accordance with 15 U.S.C. § 2310(d).

COUNT VIII
BREACH OF IMPLIED WARRANTY
PURSUANT TO THE MAGNUSON-MOSS WARRANTY ACT
15 U.S.C. § 2301, *et seq.*
(On behalf of the Nationwide Class)

172. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

173. Klebba brings this claim on behalf of himself and the Nationwide Class, or, in the alternative, on behalf of the Texas Class.

174. Klebba and the class members are “consumers” within the meaning of the MMWA, 15 U.S.C. § 2301.

175. Netgear is a “supplier” and “warrantor” within the meaning of § 2301.

176. The Arlo Baby is a “consumer product” within the meaning of § 2301.

177. Netgear made implied warranties arising under state law regarding the Arlo Baby within the meaning of § 2301(7).

178. Netgear’s warranties were the basis of the bargain of the contract between Klebba and Netgear for the sale of the Arlo Baby to Klebba.

179. Netgear has been afforded a reasonable opportunity to cure its breach of warranties.

180. The amount in controversy of Klebba’s and the class members’ individual claims meets or exceeds the sum of \$25.

181. The amount in controversy of this action exceeds the sum of \$50,000, exclusive of interest and costs, computed on the basis of all claims to be determined in this lawsuit.

182. Further, Netgear breached these implied warranties because the Arlo Baby does not perform as Netgear represented or it is not fit for its intended use and Netgear did not repair the Arlo Baby’s defects; provided the Arlo Baby in a non-merchantable condition, which presents a risk of danger and bodily harm as a result of the defects, and was not fit for the ordinary purpose for which baby monitors are used; provided Arlo Babies that were not fully operational, safe, or reliable; and failed to cure the defects and nonconformities once they were identified.

183. Netgear violated the MMWA by failing to comply with the implied warranties it made to the class by, among other things: (a) selling Arlo Baby devices that were defective in workmanship, material, or design, requiring constant manual intervention to restart and reconnect the Arlo Baby to monitoring devices; (b) refusing to repair or refund the Arlo Baby after it was

revealed that it was unable to perform as warranted; and (c) warranting that the Arlo Baby could be used as a “traditional baby monitor” with the companion tablet, yet deciding not to release the tablet for consumers.

184. Resorting to any informal dispute settlement procedure and/or affording Netgear another opportunity to cure these breaches of warranties is unnecessary and/or futile.

185. Any remedies available through any informal dispute settlement procedure would be inadequate under the circumstances, as Netgear has failed to remedy the problems associated with the Arlo Baby, and, as such, has indicated it has no desire to participate in such a process at this time.

186. Any requirement—whether under the MMWA or otherwise—that Klebba resort to an informal dispute resolution procedure and/or afford Netgear a reasonable opportunity to cure its breach of warranties is excused and thereby deemed satisfied.

187. As a direct and proximate result of Netgear’s breach of implied warranties, Klebba and the members of the classes sustained damages and other losses in an amount to be determined at trial.

COUNT IX
VIOLATIONS OF THE CALIFORNIA FALSE ADVERTISING LAW
Cal. Bus. & Com. Code § 17500 *et seq.*
(On behalf of the Nationwide Class)

188. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

189. Klebba brings this claim on behalf of himself and the Nationwide Class.

190. California Bus. & Prof. Code § 17500 states: “It is unlawful for any ... corporation ... with intent directly or indirectly to dispose of real or personal property ... to induce the public to enter into any obligation relating thereto, to make or disseminate or cause to be made or

disseminated ... from this state before the public in any state, in any newspaper or other publication, or any advertising device, ... or in any other manner or means whatever, including over the Internet, any statement ... which is untrue or misleading, and which is known, or which by the exercise of reasonable care should be known, to be untrue or misleading.”

191. Netgear caused to be made or disseminated through Texas and the United States, through advertising, marketing and other publications, statements that were untrue or misleading, and which were known, or which by the exercise of reasonable care should have been known to Netgear, to be untrue and misleading to consumers, including Klebba and the class members.

192. Netgear has violated Cal. Bus. & Com. Code § 17500 because the misrepresentations and omissions regarding the performance, reliability, and functionality of the Arlo Baby as set forth in this complaint were material and likely to deceive a reasonable consumer, and its advertisements of a companion tablet that enabled the Arlo Baby to operate as a “traditional baby monitor” were plainly false, and continue to be false.

193. Had Klebba and the class known that the Arlo Baby was unable to provide reliable monitoring of babies, requiring frequent manual resets and often shutting off for hours at a time, and that it would not be able to be operated without an active internet connection at all times, he would not have purchased the Arlo Baby.

194. Absent Netgear’s misrepresentations and omissions and other unlawful, unfair, or fraudulent practices, Klebba and the class would not have purchased the Arlo Baby, or would not have purchased it at the price he paid.

195. All of the wrongful conduct alleged herein occurred, and continues to occur, in the conduct of Netgear’s business, and Netgear’s wrongful conduct is part of a pattern or generalized course of conduct that is still perpetuated and repeated, both in the State of Texas and nationwide.

196. As a direct and proximate result of these unlawful, unfair, or fraudulent commercial practices, Klebba and the members of the class have suffered injury in fact including lost money or property as a result of Netgear's practices.

197. Klebba requests that this Court enter such orders or judgments as may be necessary to enjoin Netgear from continuing its unfair, unlawful, and/or deceptive practices and to restore to Klebba and the members of the class any money Netgear acquired by unfair competition, including restitution and/or restitutionary disgorgement.

COUNT X
VIOLATIONS OF THE CALIFORNIA UNFAIR COMPETITION LAW
Cal. Bus. & Com. Code § 17200 *et seq.*
(On behalf of the Nationwide Class)

198. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

199. Klebba brings this claim on behalf of himself and the Nationwide Class.

200. California Business and Professions Code § 17200 prohibits any "unlawful, unfair, or fraudulent business act or practices."

201. Netgear's conduct, as described herein, was and is in violation of the UCL in at least the following ways:

- by intentionally concealing from Klebba and the class members that Netgear did not intend to release the Arlo Baby's companion tablet so that the Arlo Baby could be used as a "traditional baby monitor" without requiring an active internet connection;
- by marketing the Arlo Baby as possessing functional and defect-free baby monitoring capabilities; and

- by advertising that the Arlo Baby, in its normal use, would let consumers monitor their children “anywhere, anytime” and let them “always stay connected to the most important things in your life, even when you can’t be where they are.”

202. Had Klebba known that the Arlo Baby was unable to provide reliable monitoring of babies, requiring frequent manual resets and often shutting off for hours at a time, and that it would not be able to be operated without an active internet connection at all times, he would not have purchased the Arlo Baby.

203. Absent Netgear’s misrepresentations and omissions and other unlawful, unfair, or fraudulent practices, Klebba would not have purchased the Arlo Baby, or would not have purchased it at the prices he paid.

204. As a direct and proximate result of these unlawful, unfair, or fraudulent commercial practices, Klebba and the members of the class have suffered injury in fact, including lost money or property as a result of Netgear’s misrepresentations and omissions.

205. Klebba seeks to enjoin further unlawful, unfair, and/or fraudulent acts or practices by Netgear under Cal. Bus. & Prof. Code § 17200.

206. Klebba requests that this Court enter such orders or judgments as may be necessary to enjoin Netgear from continuing its unfair, unlawful, and/or deceptive practices and to restore to Klebba and the members of the classes any money Netgear acquired by unfair competition, including restitution and/or restitutionary disgorgement, as provided in Cal. Bus. & Prof. Code § 17203.

**COUNT XI
UNJUST ENRICHMENT
(On behalf of the Nationwide Class)**

207. Klebba repeats and re-alleges each and every factual allegation contained in paragraphs 1 through 90.

208. Klebba brings this claim on behalf of himself and the Nationwide Class.

209. Netgear has benefitted from selling at an unjust profit defective Arlo Baby monitors whose value was artificially inflated by Netgear's concealment of its true characteristics and promises regarding its ability to function as a baby monitor, and Klebba and the class members have overpaid for the Arlo Baby.

210. Netgear has received and retained unjust benefits from Klebba and the class members, and inequity has resulted.

211. It is inequitable and unconscionable for Netgear to retain these benefits.

212. Netgear knowingly accepted the unjust benefits of its fraudulent conduct.

213. As a result of Netgear's misconduct, the amount of its unjust enrichment should be disgorged and returned to Klebba and the class members, in an amount to be proven at trial.

Conclusion

WHEREFORE, Klebba respectfully requests relief and judgment as follows:

- A. Determining that this action is a proper class action under Rule 23 of the Federal Rules of Civil Procedure;
- B. Adjudging and declaring that Netgear violated the UCL, California's False Advertising Law, and the MMWA, and breached its express and implied warranties to Klebba and the classes;
- C. Declaring that Netgear has engaged in the wrongful conduct alleged;

- D. Awarding Klebba and members of the classes actual, consequential, and/or compensatory damages, and pre-judgment and post-judgment interest;
- E. Awarding injunctive relief, including but not limited to restitution to Klebba and members of the classes;
- F. Awarding Klebba and members of the classes their reasonable costs and attorneys' fees incurred in this action, including expert fees; and
- G. Awarding other and further relief as the Court may deem just and proper.

TRIAL BY JURY

Klebba is entitled to and hereby demands a trial by jury.

Dated: May 24, 2018

Respectfully submitted,

/s/ Aaron D. Radbil

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Counsel for Plaintiff and the proposed classes

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Ryan Klebba

(b) County of Residence of First Listed Plaintiff Travis (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Aaron D. Radbil, Greenwald Davidson Radbil PLLC, 106 E. 6th Street, Austin, TX 78701, aradbil@gdrlawfirm.com, 512-322-3912.

DEFENDANTS

Netgear, Inc.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location. Includes options for Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, and Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C. § 2301; 28 U.S.C. § 1332, Tex. Bus. & Com. Code §§ 2.313, 2.314, 2.315; Cal. Com. Code § 2.313, etc. Brief description of cause: Deceptive, false, and/or misleading advertising, breach of express and implied warranties.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 5/24/2018 SIGNATURE OF ATTORNEY OF RECORD /s Aaron D. Radbil

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

EXHIBIT A

Hi Goldmar

I still have constant issues with the android app on all devices...cutting out, disconnecting, taking forever to reconnect and a terrible lag on the camera. I have looked at many online forums and this is a constant complaint about the android app. I understand the iphone app is much better and even has an auto reconnect feature. When will the android app be improved? It is not usable as a baby monitor in its current state. It cut out on me the other night and my babies cried for 2 hours before i woke up and realized that it had become disconnected. This is unacceptable as a baby product and should be pulled from the shelf until the platform is more stable. I even bought a tablet (android) when i first got the unit because the arlo tablet wasn't out yet. Now there is literally no date when the tablet will be available. Again another unacceptable issue - the tablet has been delayed over and over (even given previous available dates) with is false marketing and borderline fraud. Please escalate this issue to your upper management as i now have a \$300 paperweight that i don't trust to stay connected to monitor my baby. I will also be posting reviews on amazon and on the arlo forum discouraging other buyers from buying this product due to the huge issues.

This was replied on 30/Dec/2017.

Hi Ryan,

Good day!

Thank you for the response and I'm sorry to hear about the experiences that you're having with the app. Rest assured that your comments and feedback are documented as these are important to us to better our services. Let me discuss your issues with the appropriate team so that I can give you accurate answers especially with the development of the android app and with the Arlo Baby monitor.

Head office will be closed until the holidays so I would like to ask more time for me to get back to you on this.

I appreciate your time and I do apologize for the inconvenience.

Regards,

Goldmar
Expert ID 8310
NETGEAR Level 2 Support

In between this email until 06/Feb/2018, the case was escalated to our higher tiers. You sent email update on 06/Feb/2018.

Goldmar

Someone from your executive mgmt contacted me shortly after this email. They assured me my problems would be fixed and they would make it right. To date

NOTHING from anyone else. I am shocked by the lack of support for such a serious issue. There are talks on an online forum of a class action lawsuit against netgear for the serious problems that are occurring with this baby monitor and the companies unwillingness to address the serious issues.

My colleague responded to your email on 07/Feb/2018.

Hi Ryan,

Our engineers are still currently working on a fix for this. We will send another follow-up to them and we will let you know once we receive any feedback.

Thank you for your cooperation on this case. Have a great day!

Best Regards,

Neil
Expert ID: 8324
NETGEAR Level 2 Support Expert

And a follow up email was sent by Goldmar again on 14/MAR/2018.

Hi Ryan,

Good day!

I'd like to inform you that the always listening issue should be solved after Android app ver. 2.4.5.05 and later version. Engineering tested and confirmed that they do not see the issue.

Please check if you're still seeing the issue. Make sure that the app on your phone is v2.4.8.19938.

I'm looking forward for your feedback.

Regards,

Goldmar
Expert ID 8310
NETGEAR Level 2 Support

Goldmar tried to call you on 16/Mar/2018 but he was not able to reach you. And the last update to this case is your last email requesting to whole correspondence to the case.

Let me know if there is anything else that I can assist you with.

Thank you once again for choosing NETGEAR.

Best Regards,

Christine
Expert ID 8306
NETGEAR Level 2 Support

*** This is an automatic, system-generated message. Please do not reply directly to this message. ***

To send a follow-up response, click on the following link:

[https://my.netgear.com/myNETGEAR/portal/OnlineCaseUpdate.aspx?
val=yaYJaZ1vFCAGlncSz6CWNO%3D%3D&id=t2Vx2OzBHQNT8s68tkhIyg%3D%3D](https://my.netgear.com/myNETGEAR/portal/OnlineCaseUpdate.aspx?val=yaYJaZ1vFCAGlncSz6CWNO%3D%3D&id=t2Vx2OzBHQNT8s68tkhIyg%3D%3D)

NOTE: If clicking the link above does not work, copy and paste the URL in a new browser window instead.

EXHIBIT B

Arlo Baby and Dedicate Touch Screen Monitor

My wife and I have an Arlo Pro system and are interested in the Arlo Baby. We also really like the dedicated touch screen so we could separate the Arlo Baby from our other Arlo's a little and because the live stream on the app times out after awhile and it would mean we don't have to dedicate our tablets or phones to streaming the baby's cam. We have a 9 week old, so we hope to get the Arlo Baby sooner versus later and noticed the version with the dedicated touchscreen monitor isn't on preorder and is said to arrive sometime in the summer.

Questions: Is the current pre-order Arlo Baby model without the dedicated touchscreen able to function with the touchscreen monitor later? Will the monitor be sold separately as well so that we could pre-order an Arlo Baby now and then buy the touch screen monitor separately to go with it when it comes out or if we simply wanted a second dedicated monitor later?

Solved! [Go to Solution.](#)

Message [1](#) of 145

Labels:

- [Before You Buy](#)

0 Kudos

[Reply](#)

Accepted Solutions



JamesC
NETGEAR Moderator

2018-03-14 09:39 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Dear Arlo Baby user,

First of all, we would like to thank you for being an Arlo Baby customer. We hope that this product has been a valuable addition to your family and keeping you close to your little one. Our ultimate goal has been to create the best, most innovative smart baby monitor in the market. Since the product launched in May 2017, our product and engineering teams have been working on improving connectivity, response time, and adding background features to make using Arlo Baby a delight for you to use every day. We recently launched our integration with Apple HomeKit to provide even more ways for you to make the most out of the product.

We wanted to let you know that we no longer plan to release a dedicated display monitor. Instead, we are offering people who bought an Arlo Baby a \$30 coupon for an [Amazon Fire HD 8 Tablet](#) (16GB, With Special Offers), redeemable on Amazon.com. We think this tablet is a great alternative to the Arlo Baby Touchscreen Display. It works great with the Arlo app, offers great image and audio quality, and is Alexa-enabled so you can take advantage of the voice control capability offered by Amazon Alexa. If you would like to take advantage of this offer, please reach out to the [Arlo Customer Support team](#). Please be prepared to provide your name, email address, and your Arlo Baby serial number/MAC address which can be found under the camera. Once our team has been able to verify your ownership of an Arlo Baby camera, we will respond to you with a one-time use coupon. This offer is only available to owners of Arlo Baby cameras registered before March 31, 2018.

Warm regards,

The Arlo Team

Message [99](#) of 145

Tags (3)

- Tags:
- [NOT SOLVED](#)
- [Pathetic](#)
- [typical netgear](#)

0 Kudos



All Replies



[JamesC](#) 
NETGEAR Moderator

2017-05-08 01:03 PM

Re: Arlo Baby and Dedicare Touch Screen Monitor

dsmythe,

The touchscreen display will be available as a stand-alone add-on for Arlo Baby in addition to the bundle. More information will be available on this closer to release.

JamesC

Message [2](#) of 145

0 Kudos



[felickz](#) 
Initiate

2017-05-09 08:12 PM

Re: Arlo Baby and Dedicare Touch Screen Monitor


Will it show me all my arlo pro camera feeds or just the baby cam?

Message [3](#) of 145

1 Kudo

[Reply](#)



PBJ918 
Tutor

2017-06-05 06:25 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Ditto

Message [4](#) of 145

0 Kudos

[Reply](#)



JamesC 
NETGEAR Moderator

2017-06-05 07:56 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

The Arlo Baby 7" Touchscreen Display, shipping in Summer of 2017, will be available for purchase as an add-on to your existing Arlo Baby camera for \$99.99, or in a set with the Arlo Baby camera for \$349.99.

In its Direct Connect mode, the display will allow for live streaming of video from the Arlo Baby camera without the need for an Internet connection. Cloud features such as remote live streaming and Library access will not be available from the tablet in Direct Connect mode. The display can also connect to the cloud via WiFi, just like a regular smart tablet. When connected to WiFi, the tablet will have all the cloud features as you would expect from the Arlo mobile app, and allow you to access all devices on your Arlo account.

JamesC

Message [5](#) of 145

3 Kudos

[Reply](#)



[rader](#)
Guide

2017-06-20 11:56 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

When is the release date for the dedicated tablet? We are well into summer and I bought Baby expecting an imminent release for the tablet.

Message [6](#) of 145

1 Kudo

[Reply](#)



[JamesC](#)
NETGEAR Moderator

2017-06-22 09:41 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

rader,

Currently, the target eta is later this year (hoping for a mid-Q3 release). I will post an update when I have more information.

JamesC

Message [7](#) of 145

0 Kudos

[Reply](#)



[jmelizondo](#)
Initiate

2017-07-28 10:22 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Hi, James. There is an article on the arlo site that the touchscreen would be available in July 2017:

<https://kb.arlo.com/1285498/When-will-the-Arlo-Baby-touchscreen-display-be-available-to-buy>

As we are closing in on August, any updates?

Message [8](#) of 145

1 Kudo

[Reply](#)



[JamesC](#) 
NETGEAR Moderator

2017-07-28 10:28 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

jmelizondo,

I believe the target is still for Q3 (I don't have a more granular date). I will provide an update when I have more information.

JamesC

Message [9](#) of 145

0 Kudos

[Reply](#)



JeremyBrumm 

Star

2017-08-10 08:57 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I am also looking for a release date for this, do we have a more accurate ETA yet?

Model: VMB3000 | Arlo Base Station,VMC4030| Arlo Pro Wire-Free Camera,arlo.netgear.com | Web Site/App
Message [10](#) of 145

Tags (1)

- Tags:
- [baby monitor](#)

2 Kudos

[Reply](#)



Zamora13 

Initiate

2017-08-10 07:50 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


We have to arlo home system and are looking into the baby monitor. The press release says the add on monitor should be released q2 which we have now passed. Any word on she this will be available.

Message [11](#) of 145

2 Kudos

[Reply](#)



Ashnj412 

Initiate

2017-08-18 08:35 AM

Arlo Baby 7" Touchscreen Display

Hi there,

We currently have the Arlo Pro system and were curious if the touchscreen display would work for the cameras we already have or if you have to have the baby monitor. Also, it keeps being noted that the display will be out this summer but as August is about to end is there a more accurate release date?

Message [12](#) of 145

4 Kudos

[Reply](#)



[JeremyBrumm](#) 
Star

2017-08-18 11:22 AM

Re: Arlo Baby 7" Touchscreen Display

I would also really like to know when this is coming out. Im ready to buy it, please take my money.

Message [13](#) of 145

3 Kudos

[Reply](#)



[John3](#) 
Initiate

2017-08-19 08:54 AM

Re: Arlo Baby 7" Touchscreen Display

I would also like to get an answer to these questions.

Model: VMB3000 | Arlo Base Station

Message [14](#) of 145

1 Kudo

[Reply](#)



Moodyj 
Aspirant

2017-08-20 09:32 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Ditto on release date for dedicated baby monitor screen. Good to know about direct connection mode.

Message [15](#) of 145

0 Kudos



rader 
Guide

2017-08-21 07:50 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

JamesC, This is becoming really frustrating. Please tell me the "&" Monitor is being released this week.

Message [16](#) of 145

1 Kudo



JamesC 
NETGEAR Moderator

2017-08-21 11:46 AM

Re: Arlo Baby 7" Touchscreen Display

The Arlo Baby 7" Touchscreen Display, shipping in Summer of 2017, will be available for purchase as an add-on to your existing Arlo Baby camera for \$99.99, or in a set with the Arlo Baby camera for \$349.99.

In its Direct Connect mode, the display will allow for live streaming of video from the Arlo Baby camera without the need for an Internet connection. Cloud features such as remote live streaming and Library access will not be

available from the tablet in Direct Connect mode. The display can also connect to the cloud via WiFi, just like a regular smart tablet. When connected to WiFi, the tablet will have all the cloud features as you would expect from the Arlo mobile app, and allow you to access all devices on your Arlo account.

JamesC

Update: The latest information I have on target availability is Quarter 3 of 2017 (Months of July, August, September). I do not have any official release information at this time.

Message [17](#) of 145

1 Kudo

[Reply](#)



[JamesC](#) 
NETGEAR Moderator

2017-08-23 11:45 AM

Re: Arlo Baby and Dedicat Touch Screen Monitor

Update: The latest information I have on target availability is Quarter 3 of 2017 (Months of July, August, September). I do not have any official release information at this time.

JamesC

Message [18](#) of 145

1 Kudo

[Reply](#)



[JeremyBrumm](#) 
Star

2017-08-23 11:49 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Thanks for the update, I appreciate it.

If you do get a more exact date, please let us know.

Model: VMC4030| Arlo Pro Wire-Free Camera
Message [19](#) of 145

Tags (3)

- Tags:
- [Arlo](#)
- [baby](#)
- [Release Date](#)

1 Kudo

[Reply](#)



[adambean](#) 
Luminary

2017-08-23 07:36 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

When speaking with netgear via chat as well as Facebook, September is the target month as of a couple weeks ago.

Message [20](#) of 145

0 Kudos

[Reply](#)



[Knfoster1](#) 
Aspirant

2017-08-28 10:00 AM

Arlo baby touch-screen display

When does the touch-screen come out?

Message [21](#) of 145

0 Kudos

[Reply](#)



[ChicagoOutfit](#) 
Guide

2017-08-28 12:34 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Hello,

We have twins... so, will we be able to monitor both of our Arlo Baby's streams at the same time? I am hoping the Arlo Baby 7" Touchscreen Display (ABD1000) will be able to have a split screen mode. Please let me know if this is an intended functionality.

Thank you

Message [22](#) of 145

1 Kudo

[Reply](#)



[JamesC](#) 
NETGEAR Moderator

2017-08-29 08:08 AM

Re: Arlo baby touch-screen display

I do not have an exact launch date at this time. The current target for release is Q3 of this year.

JamesC

Message [23](#) of 145

0 Kudos

[Reply](#)



koche
Initiate

2017-08-29 08:30 AM

Re: Arlo baby touch-screen display

Its almost Sep and no date yet. Thanks but I'm out. Retruning my Arlo baby and the rest of the cameras and going with another platform.

Message [24](#) of 145

1 Kudo



JamesC
NETGEAR Moderator

2017-08-29 02:02 PM

Re: Arlo Baby and Dedicat Touch Screen Monitor

ChicagoOutfit,

Yes, you can have multiple Arlo Baby cameras connected to one display.

JamesC

Message [25](#) of 145

1 Kudo



ChicagoOutfit
Guide

2017-08-29 02:24 PM

Re: Arlo Baby and Dedicat Touch Screen Monitor

Right. Great. But, can you stream two Arlo Baby Cameras at the exact same time on the device... seeing the streams on a "split screen" type of view?


(This would alleviate having to switch back and forth between two cameras.)

Thank you!

Message [26](#) of 145

0 Kudos



[matt_freder](#) 
Initiate

2017-08-31 01:17 PM

Arlo Baby 7" Touchscreen Display (ABD1000)

I've seen that the Arlo Baby 7" touchscreen Display has been marked as "coming soon" for some time. I would like to purchase the Arlo baby camera along with the touchscreen display. But I would need both products. Any clue as to how soon is "soon?" Are there any other Arlo displays available other than using a mobile device which isn't a closed circuit connection and isn't always running. Thanks

Message [27](#) of 145

1 Kudo



[JamesC](#) 
NETGEAR Moderator

2017-09-01 09:43 AM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

I do not have an exact launch date at this time. The current target for release is Q3 of this year.


JamesC

Message [28](#) of 145

1 Kudo

[Reply](#)



[matt_freder](#) 
Initiate

2017-09-01 10:41 AM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

Thank you

Message [29](#) of 145

0 Kudos

[Reply](#)



[jscirocco](#) 
Aspirant

2017-09-02 04:40 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I would like to know this as well

Message [30](#) of 145

0 Kudos

[Reply](#)



[JamesC](#) 
NETGEAR Moderator

2017-09-07 10:59 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

After further verification, I've been informed that the Arlo Baby touchscreen monitor will be able to stream two Arlo Baby cameras simultaneously.

JamesC

Message [31](#) of 145

2 Kudos

[Reply](#)



[ChicagoOutfit](#) 
Guide

2017-09-07 12:02 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Excellent news! Let's release this thing!

Message [32](#) of 145

0 Kudos

[Reply](#)



[Packer86](#) 
Initiate

2017-09-07 08:22 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Can screen be pre ordered? When is is being released? How soon could I have it in my house?
Baby is 5 days old

Message [33](#) of 145

0 Kudos

[Reply](#)



[MAKnificent24](#) 
Aspirant

2017-09-08 02:39 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Can this run three baby cameras simultaneously? What time in Sept will this
release? Will it timeout?

Thank You

Message [34](#) of 145

0 Kudos



[jdepew](#) 
Tutor

2017-09-11 12:49 PM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

So....just noticed this on the product page....

"This Arlo Baby combo set will be available for purchase in **Spring 2018**. Join our pre-order list for future updates on availability!"

What is going on? I bought into the Arlo Baby system - as I'm sure many others did - because of the dedicated display. This is a REQUIRED part of a baby monitoring system. Another 6 month delay is unacceptable.... please update.


Message [35](#) of 145

Tags (1)

- Tags:
- [ABD1000](#)

3 Kudos



[gmtom1](#) 
Tutor

2017-09-12 07:32 AM

Re: Arlo Baby and Dedicat Touch Screen Monitor


It's almost mid-September. Is this thing EVER going to be released? If I don't get a definite answer in the next week, you've lost my business Netgear.

Message [36](#) of 145

1 Kudo

[Reply](#)



[Packer86](#) 
Initiate

2017-09-12 01:22 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Yes this is not good. I'll have to start looking into something else

Message [37](#) of 145

1 Kudo

[Reply](#)



[jgandhi19](#) 
Aspirant

2017-09-13 04:23 PM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

Another delay? I guess they need another 6 months to make sure that turd is nice and polished.

Message [38](#) of 145

0 Kudos

[Reply](#)



[gmtom1](#) 
Tutor

2017-09-13 04:53 PM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

Spring 2018?!?! [@JamesC](#) - Care to comment / provide an update? (And don't tell us Q3 again).

Sounds like Netgear ran into some major issues for the monitor. Common sense tells me that if the bundle is not available until Spring 2018, the standalone monitor is also not arriving until then. AFAIK, there's no practical difference between the bundle and standalone. The pricing is even the same as the two products individually.


Sorry, but unless there's a major change (like immediate availability for purchase) in the next week, I'm taking my business elsewhere. Netgear, you've lost my business.

Message [39](#) of 145

1 Kudo

[Reply](#)



[Tmamiya](#) 
Aspirant

2017-09-14 06:49 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Q3 has only 2 more weeks left, any update on when the dedicated monitor will be released??

Message [40](#) of 145

0 Kudos

[Reply](#)



[JamesC](#) 
NETGEAR Moderator

2017-09-15 09:32 AM


Re: Arlo Baby 7" Touchscreen Display (ABD1000)

The release of the Arlo Baby touchscreen display has been delayed as further development work needs to be done to bring the product's performance to a level that we believe will satisfy our users' expectations. With the touchscreen display, our goal is to offer a monitoring experience which is simple, real-time, and reliable while still allowing our users to access the smart features Arlo Baby has to offer. We understand that this delay may be causing disappointment amongst our existing Arlo Baby users and we ask for your patience while the Arlo team works on perfecting the product's performance. In the meantime, we recommend that you use a tablet, if available, as a monitoring device.

Message [41](#) of 145

0 Kudos



[adambean](#) 
Luminary

2017-09-15 10:30 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

[@JamesC](#)


Is there any chance at getting a date/range? Are we talking next month or two, or 2018?

Thanks

Message [42](#) of 145

1 Kudo



bradpeschel 
Aspirant

2017-09-17 10:05 AM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

Can anyone recommend a cheap alternative tablet as I do not currently have one? The posts on this forum suggest that the Amazon Fire Tablets do to support push notifications from the Arlo app.

Message [43](#) of 145

0 Kudos

[Reply](#)



gmtom1 
Tutor

2017-09-17 10:35 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

[@adambean](#) The site says the bundle package (cam + monitor) will be available in Spring 2018, so I wouldn't expect anything until at least summer 2018.

Message [44](#) of 145

0 Kudos

[Reply](#)



bradpeschel 
Aspirant

2017-09-17 11:04 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

With that kind of timeline I wouldn't be surprised if a new camera gets released with the tablet.

Message [45](#) of 145

0 Kudos

[Reply](#)



Jeff S
Aspirant

2017-09-19 06:50 AM

Arlo Baby Touchscreen

Hello -

Wanted to see if there is a more recent update on the release date for the Touchscreen that accompanies the Arlo Baby camera? It's nearly the end of 3Q 2017 so hoping to get a more definitive date.

Thanks!

Message [46](#) of 145

0 Kudos



rader
Guide

2017-09-19 07:05 AM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

Emphasized...

JamesC wrote:

We understand that this delay may be causing disappointment amongst our existing Arlo Baby users...

This is ridiculous and borders on fraud. Is Netgear going to do anything to compensate all of us who bought in to a promised system? My child will be a year old by the time you release.

Message [47](#) of 145

0 Kudos





[jguerdat](#) SUPERUSER

Guru

2017-09-19 11:07 AM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

Fraud? Really? An announcement, regardless of whether a projected date was "promised", hardly constitutes fraud. Better consult a legal dictionary.

Message [48](#) of 145

0 Kudos



[rader](#)
Guide

2017-09-19 11:22 AM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

If you don't think repeatedly stating a critical accessory is coming in just a few more weeks while someone who bought in to the system with the promise of a complete product rolls past the return period for said purchase "borders" on fraud, then perhaps you should consult a legal dictionary. I have over a \$1000 invested in Arlo and Baby was the deciding factor in taking that plunge. You don't just all of a sudden decide you need six to nine more months to deliver a product... They had to have known there were serious issues and could have made everyone aware a long time ago instead of stringing invested users along with this coming "soon" nonsense.

Message [49](#) of 145

0 Kudos



[jguerdat](#) SUPERUSER

Guru

2017-09-19 04:03 PM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

Time to take a breath. There are so many more important things to hyperventilate about. Sure, it would have been nice to have a product as originally scheduled but do you want a proper product or not? Maybe there are design issues, production issues, components not available, whatever.

It's not even close to fraud. It's simply a missed target and you're making all kinds of unsupported suppositions.

Message [50](#) of 145

1 Kudo

[Reply](#)

[sullivan](#) 
Apprentice

2017-09-19 10:09 PM

Re: Arlo Baby 7" Touchscreen Display (ABD1000)

James

I am presuming the display screen only works with Arlo products? As such those who buy will already have the arlo baby.. I think you need to be taking the feedback that this community forum is giving you back to the powers that be at Arlo about just how unhappy everyone is. I am one of those people that went into Arlo in a big way as have 8 Arlo pros plus the Baby. Suggesting a monitor is a poor substitute for mis managing expectations. The Arlo lag in real time viewing can't be a consideration when your talking about a baby. You development team generally are way behind your competitors, most cameras are instant record and even seconds before (UCam247Live for example) . Not about 5 seconds in so miss the key activity! Are you going to consider allowing refunds of opened and used products? Or at worst a massive discount at launch (even prelaunch) to those already purchased an Arlo baby? At lot of people bought this in good faith. It's not fraud clearly, but Arlo does have a responsibility it does need to answer to as currently the product is not fit for purpose where seconds are vital in the life/death of a baby in trouble.

Message [51](#) of 145

3 Kudos

[Reply](#)



JamesC
NETGEAR Moderator

2017-09-20 08:39 AM

Re: Arlo Baby Touchscreen

Jeff_S,

The release of the Arlo Baby touchscreen display has been delayed as further development work needs to be done to bring the product's performance to a level that we believe will satisfy our users' expectations. With the touchscreen display, our goal is to offer a monitoring experience which is simple, real-time, and reliable while still allowing our users to access the smart features Arlo Baby has to offer. We understand that this delay may be causing disappointment amongst our existing Arlo Baby users and we ask for your patience while the Arlo team works on perfecting the product's performance. In the meantime, we recommend that you use a tablet, if available, as a monitoring device.

You can follow release updates for this product here: [Arlo Baby 1080p HD Monitoring Camera and 7" Touchscreen Display - Coming Soon!](#)

JamesC

Message [52](#) of 145

1 Kudo



Steph44
Guide

2017-09-21 12:28 PM

Re: Arlo Baby Touchscreen


Will the wall stand be released before the monitor?

Message [53](#) of 145

0 Kudos

[Reply](#)



[AlbertL](#) 
NETGEAR Employee

2017-09-25 02:42 PM

Re: Arlo Baby Touchscreen


Wall stand has been released and available.

Message [54](#) of 145

0 Kudos

[Reply](#)



[adambean](#) 
Luminary

2017-09-25 03:06 PM

Re: Arlo Baby Touchscreen


Stand still says coming soon.

Message [55](#) of 145

0 Kudos

[Reply](#)



[Phifer](#) 
Aspirant

2017-09-28 12:48 AM

Local Arlo Baby Access

Hi,

I have an Arlo baby and the amount of lag time to get my camera feed is laughable at times. The tablet that still does not have a release date will have a direct connection to the camera so it will not require an internet connection. This will improve camera feed times when on the same network as the camera. Why is this not built into the android and iOS apps? Thank you

Message [56](#) of 145

0 Kudos



[EZEKIEL54](#) 

Initiate

2017-10-04 10:56 AM

Baby monitor screen

When is the arlo baby screen coming out? I've been told since March it was coming soon I want to return my arlo baby because of this. I cannot view the camera offline. This is unfortunate because I have arlo pro and prefer all my cameras to be on one feed.

Model: VMB3000 | Arlo Base Station

Message [57](#) of 145

Tags (1)

- Tags:
- [Arlo Baby](#)

1 Kudo



[nogoalielikeme](#) 

Initiate

2017-10-04 06:16 PM

Arlo Baby Touchscreen Display

Hello,

When will the 7" touchscreen display be out for the Baby Monitor. There's been no update, and at first the release date was in summer, then end of summer, then end of Q3. It is now October, and past all these dates, please provide an update.


Thank you.

Message [58](#) of 145

1 Kudo

[Reply](#)



[Schreibz](#) 
Tutor

2017-10-14 08:58 PM

Re: Arlo Baby Touchscreen


So I bought a baby monitor for my newborn with the assurance that the screen would come sometime over summer. Now it's being said spring 18... my newborn won't be a newborn by then. So this monitor goes from one of the best purchases to a pretty foolish one as WiFi mode on tablets isn't very reliable...

Message [59](#) of 145

1 Kudo

[Reply](#)



[TheHills](#) 
Initiate

2017-10-14 10:11 PM

Re: Arlo Baby Touchscreen

Hi there - could we please get an updated eta on the touchscreen? Is there any chance it will be released by Christmas?

Message [60](#) of 145

1 Kudo

[Reply](#)



[Jarredh](#) 
Initiate

2017-10-18 06:15 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Any updates on the time of release for this screen?

Message [61](#) of 145

1 Kudo

[Reply](#)



[Bububu](#) 
Initiate

2017-10-21 03:09 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

One can be sure that for each reply here, there are 10 customers that just read these threads. Me for one have been morning the developments around the monitor availability for months and finally decided to register. The delay is unacceptable, Netgear has hundreds if not thousands of developers so any challenges can be addressed if there is a management directive. When I got the camera the expected date for our baby was 4 months after the expected availability date.

Everyone affected should register and voice their concern so the scale of the issue becomes more apparent to the Netgear team.

Message [62](#) of 145

2 Kudos

[Reply](#)



Rebbienore

Initiate

2017-10-22 07:24 AM

Touchscreen release

I've read that the Arlo touchscreen was to be available 7/2017 but when I go To purchase it still says "coming soon". Very annoying!!! When will it be available??

Message [63](#) of 145

2 Kudos



Jesiegel

Initiate

2017-10-22 09:30 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I'm quite upset here, I feel like I've been duped, arlo sold me on this device with the anticipation that the tablet would be coming in the second to third quarter in 2017, its now the fourth quarter and nothing. The app on my android keeps disconnecting, and it's not reliable, I cannot trust that my arlo will stay connected through the night. I now Need to go out and buy another baby monitor because I am now past the return date and the dedicated tablet is not available. 250 dollars down the drain on a baby monitor that works about 30% of the time. My son's life is at risk because arlos monitor cannot stay connected, this is a problem with the app, as when this happens I can connect on a different device, or when it happens a different device is still connected even though my app on the error device says that the arlo is not connected to my network which is false. When will arlo either fix the app issues or release this tablet??

Message [64](#) of 145

4 Kudos



farrellw 
Guide

2017-11-07 05:30 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


so here we are in november with no answers from netgear anymore. So this was supposed to be released back in may-july when I bought the camera for our then newborn. Here she is 6months old growing like a weed and we have to settle for an audio monitor at night, to make sure we can hear her. Arlo kind of works when we're awake, despite having to reopen the app a bigillion times because it won't stay connected. I would like to think i would just saw screw it and go buy something else, but I want that dang dedicated display. At this rate im guess the display will be available sometime between q1 and q4 of 2018-2020 Give or take a bit. So the real question is, when will it be available? Your website says coming soon as a standalone item and as a bundle item it says spring. Well, what is it, coming soon or spring? Because coming soon doesnt mean squat at this point, since it said coming soon in may, and here we are 6 months later. So is it going to be another 6 months? or maybe 12 months? C'mon netgear!

Message [65](#) of 145

3 Kudos

[Reply](#)



Papamann 
Aspirant

2017-11-25 09:00 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


[@netgear](#) please advise why there is no eta here.

Message [66](#) of 145

0 Kudos

[Reply](#)



Gurutek 
Aspirant

2017-12-01 11:35 AM


Re: Arlo Baby and Dedicate Touch Screen Monitor

Hello [@netgear](#) - Can you please help us out, and give us a realistic ship date for this product? To be frank - without the deicated monitor - the camera is pretty crappy, as you really can't trust an App 100% of the time.....

Message [67](#) of 145

0 Kudos



Tmamiya 
Aspirant

2017-12-01 01:50 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


[@netgear,](#)

I returned the Arlo Baby due to the inconsistency and unreliability of your camera and log ins. The inability to follow up on your promised dates and lack of providing dates for the monitor is bad. This is unacceptable for a product to monitor the health and safety of a baby. I will likely not purchase another Netgear product going forward. Rethink how you conduct your business.

Message [68](#) of 145

0 Kudos



pobo123 
Guide

2017-12-03 09:25 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I am in 100% agreement with the BS stringing along that Netgear has done with the arlo baby monitor screen. This is ridiculous. I had to buy a tablet to use the camera, as it is useless on the android app, and mostly useless on the adroid tablet. Fix your app Netgear, and get your screen done! This camera should have NEVER been sold without the screen, and promise of it coming soon. Borderline fraud - get people to buy a camera that is absolutely useless!!!

Message [69](#) of 145

0 Kudos

[Reply](#)



[danielhan](#) 
Aspirant

2017-12-04 12:14 PM

Re: Arlo Baby and Dedicat Touch Screen Monitor

I bought the Arlo Baby with the promise by Netgear that this touchscreen was coming out. I completely regret that mistake and I am very upset at them purposely misleading people about a product they never intended to release. This is fraud and a deceptive business practice. We should all be able to return thier Arlo Baby back to them for a full refund. I will never purchase any product from Netgear again. Their customer service is also beyond terrible.

Message [70](#) of 145

0 Kudos

[Reply](#)



[ChicagoOutfit](#) 
Guide

2017-12-04 01:06 PM

Re: Arlo Baby and Dedicat Touch Screen Monitor


My experience has been very different. Sure, I would have loved for the tablet to have come out by now... but, the cameras (I have two Arlo Baby) have not failed once. They are crystal clear on any of our devices (iPhone, iPad, iMac) and all of our friends comment on how clear is the feed.

Message [71](#) of 145

1 Kudo

[Reply](#)



[pobo123](#) 
Guide

2017-12-04 01:09 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


It sounds like your experience is only with apple products, Android platform is horrible as you can see from the above comments. Netgear needs to address their issues - i am not buying a whole new platform just to get my Arlo Baby to work as it should have worked in the beginning! I sure hope their tablet is Apple!

Message [72](#) of 145

0 Kudos

[Reply](#)



[slash32487](#) 
Tutor

2017-12-11 03:39 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

[@netgear](#) please provide an update. there needs to be an eta here. the software relying on wifi just doesnt cut it. my camera desides to not reconnect unless i turn it off on the app and turn it back on. there needs to be constant video without hiccups. i stopped subscribing because i was paying for video

not to stream. i also have a arlo Q which has the same issue. if i was relying on your feed in the event i had a robbery i would lose everything and not catch the perp. so basically your service would be worthless. on top of all of it i cannot host the footage locally so. im a very unsatisfied customer and i have ended up buying a audio monitor to supplement my bad investment. i think the software is something you need to build from scratch all over again. from reading in the community im not the only one with these issues.

Message [73](#) of 145

0 Kudos

[Reply](#)



[BigJim378](#)

Tutor

2017-12-19 06:02 PM

Re: Arlo Baby Touchscreen

James,

Is there any update on the tablet yet? I clicked the link you provided and it doesn't even list it anymore. Our baby is due in 3 weeks and I am looking to make a purchase, I will not be buying one if I can not get an update on the status of the tablet. I'm sure I am one of many who are searching this product and seeing your blanket copy and paste statements that offer little to no information and are very turned off by that.

Message [74](#) of 145

0 Kudos

[Reply](#)



[MAKnificent24](#)

Aspirant

2017-12-19 08:04 PM

Re: Arlo Baby Touchscreen

There was just an app update that keeps you logged in via any Apple product and now has an auto reconnect if the signal is lost. I have had up to 4 screens going at once on my iPad. They have canceled all dates in regards to the monitor until maybe sometime next year. So if you have an iPad you can plug in at night and use or a iPhone, you might wanna pass.

Model: VMC4030P | Arlo Pro 2 Wire-Free Camera arlo.netgear.com | Web Site/App

Message [75](#) of 145

Re: Arlo Baby Touchscreen

I do not currently have any new information on this products release. Keep an eye on the [Arlo Baby Products](#) page for updates.


JamesC

Message [76](#) of 145

0 Kudos

[Reply](#)



Schreibz 
Tutor

2017-12-20 12:30 PM

Re: Arlo Baby Touchscreen

Looking like anyone who bought the device alone with the promise of getting a monitor later is out of luck. Classic move... Now the only way to get the monitor will be to also buy a new Arlo Baby. At least that's judging by the page that the admin just told us to go to for updates. No longer any mention of the option to purchase a monitor separately, only to buy both together in spring. What are you going to do for us, Netgear? You promised something,

that got everyone to buy your device and never delivered. This is a really bad look for Netgear... I have been recommending your devices to friends for the past year, but after this, I can't in good concience recommend a company that clearly tries to screw it's customers.

Message 77 of 145

0 Kudos

Reply



dsmythe 
Tutor

2017-12-20 12:52 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I have had the Arlo Baby for several months now and I love it. It would be a tad nicer with the monitor too, but it's great without it and it's functionality, while imperfect, is largely fantastic. I looked at my neighbor's monitor the other day and it was vastly lower quality and without the vast majority of the features. My brother in law has gone through at least a few monitors with each breaking and being lower quality to my single one. I love that I can check on my little one with push alerts on my phone anywhere and I can take the Arlo Baby everywhere I'm going with wifi. I love that it can distinguish between regular audio (sometimes he babbles in bed) from crying (he needs me). Not to mention the white noise/other tunes, night light, air quality, humidity monitor and temperature gauge. I've done video chats with my wife and our baby. It's a great product. I use my phone and iPad as monitors and while I can't stream video for hours, I've never had a problem streaming audio for hours/all night (often when I sleep). I suspect at least a few complaints might relate to being unfamiliar with the functionality of the app (like being able to turn on audio that doesn't time out easily vs. video that can) and becoming upset, rather than looking up how it works. The Arlo Baby has a surprisingly large number of

features and controls and this can result in having trouble learning all of them, but once you know them, they're great.

And while I'm looking forward to getting the dedicated monitor, it is nice to know I always have a monitor since I pretty much always have my phone. I don't know many, if any, other monitors that can do that and I have to carry 1 less intrusive device, not 2.


The accusations of malicious intent are quite unfounded and bizarre to me. For example, this accusation they were listed separately, now aren't and we are out of luck. I started looking into this 10-11 months ago and have never seen them listed separately. I started this thread for the sole reason to ask if they might be available separately at some point, and they affirmed they would be upon release. So, given I've never seen them listed separately, I have no idea why someone would comment they were and that has changed unless they mean over a year ago. Maybe I missed it, but I've looked pretty regularly for awhile. The only significant change I've seen is estimated release date, which is pretty common with new tech. Every time Canary, Arlo, Ring or a host of others have new products coming, they release "coming soon" "pre-orders", etc. Sometimes those products are delayed. It's pretty common. Estimated release dates aren't promises, so it's pretty ridiculous to accuse them of "trying" to screw anyone over. It sucks, but I don't see anyone offering a dedicated tablet with real time streaming like that, so I'm not going to complain that Netgear is trying to make sure it works optimally before release (I'd rather them wait than release something that works poorly). It is to their advantage to release a fully working product and in no way to their advantage to screw anyone over.

Message 78 of 145

1 Kudo

Reply



Schreibz 
Tutor

2017-12-20 01:52 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Considering there are countless people who reference the standalone monitor, you must not have been looking for one very hard, but there was one originally stated for release when the Baby first came out. It was listed for \$100 and was slated for release in Summer. I bought my Arlo baby back in June thinking that I would have a monitor before the baby moved to his own room and checked for updates almost weekly. It went from Summer, to Fall, to now nonexistent.

I do agree that the video quality and the device is nice. I enjoy most the features that it comes with, but that doesn't mean we can't complain about it's rather significant shortcomings... As for projecting people don't look up how things work, I personally do use the audio only function at night, why would I need to view the screen while I am asleep? However, it still cuts out. Last night, for example, I woke up two hours after I went to sleep and there was no audio playing anymore. I had to go to the app and start the audio back up, it did stay connected the rest the night. That happens roughly once a week, which doesn't sound too bad... Unless you are talking about a device meant to monitor a baby. That can't happen, ever. I have thought about buying an audio monitor for this, but why should we need a separate device to go along with one of the more expensive baby monitors that doesn't include a tablet out there?

One thing I am interested to know though is how often you see the baby crying alert, as oposed to the audio detected in baby's room. Maybe I am doing something wrong, but I have only seen that alert a few times. The first


time was one of the first days and I thought it was awesome, but now can't remember the last time I saw it. So if you have any tips on that, please let me know!

Message 79 of 145

0 Kudos

[Reply](#)



adambean 
Luminary

2017-12-21 01:01 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I'm confused, are we now to understand that when/if the monitor is released, it won't be available as a stand alone purchase? That can't be right.

Message 80 of 145

0 Kudos

[Reply](#)



ChicagoOutfit 
Guide

2017-12-21 05:40 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Netgear, you really had better offer a stand-alone tablet when you launch (even if it's just for registers users). I own two, very good Arlo Baby cameras... and I do NOT want to have to purchase another camera with a tablet. That would be a truly ridiculous request of current owners. Better re-think this... it was listed as a \$99 accessory for months.

Message 81 of 145

0 Kudos

[Reply](#)



adambean 
Luminary

2017-12-21 05:47 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

See attached.

I purchased two Arlos under the impression that we would be able to buy the monitor later.

They will release it stand alone, have faith. [@JamesC](#), some clarity would be appreciated.

Thanks

Message [82](#) of 145

[Screenshot_20171221-204445.jpg](#) 302 KB

0 Kudos



mwittkopp89 
Tutor

2018-01-05 10:16 AM


Re: Arlo Baby and Dedicate Touch Screen Monitor

Has anyone heard anything more about the dedicated touchscreen? I recently purchased the Arlo and it would be nice to have the dedicated touchscreen monitor. It seems like they first started advertising this monitor last year with an expected release date of Summer 2017, now that summer and fall have come and gone, do think there is an end in sight for the touchscreen monitor?

Message 83 of 145

0 Kudos



tomncincy 
Apprentice

2018-01-08 06:51 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I've kept quiet on this issue for some time now hoping that Netgear would resolve this without the need for legal action but my patience is running out. If this product is not made available as a standalone purchase by the end of the 1st quarter of 2018, I will have no choice other than to seek judicial relief.

It angers me to no end that I'm going to need to retain counsel at a significant expense to myself however, make no mistake that I am unwavering in my resolve on this matter and I'm fairly confident that I will be able to recover legal fees when all is said and done.

At issue here are two potential liabilities that Netgear management should take serious notice of. First off by failing to make the touchscreen monitor available for purchase, Netgear is forcing parents to stream video of their minor children over the internet via servers that we can only assume are secure.

The second issue is the reliability of these servers because by forcing consumers to stream through remote servers, any service outage could expose Netgear to serious liability should this service fail resulting in serious injury or God forbid death of a child. Why would any company openly subject themselves to such a potential liability? Greed and arrogance come to mind.

James, I know that you monitor the community forums, so I'm going to request that you to pass this on to Netgear managment and encourage them to reach out to me. It's my sincere wish that we can come to a satisfactory resolution to this issue not just for myself but for everyone that purchased the Arlo Baby device with the belief that Netgear would make the touchscreen monitor available for purchase to consumers that wish to purchase one.

If someone from Netgear management or thier legal councler wishes to reach out to me on this issue, they know how to contact me other than that, this is the last I have to say on this subject other than to emplore Netgear not to test my resolve on this matter.

Please understand that I am not looking to receive any financial gain here other than the recovery of expenses I might incur resulting from legal action should that course of action be unavoidable. What I will be seeking is to persuade Netgear to either provide a free monitor in a reasonable time frame as decided by the courts or be required to buy back the cameras from consumers that were duped into purchasing the Arlo Baby when it was released, with the belief that Netgear would make the touchscreen monitor available in a reasonable amount of time, which they have not by any definition legal or otherwise.

Respectfully,


Thomas R. Mitchell

Message 84 of 145

3 Kudos

Reply



pobo123 
Guide

2018-01-08 07:01 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Thomas I will gladly join you. I too have put them on notice and have requested the exact same thing you have 1. A free monitor or 2. Buy my camera. This is unacceptable on all levels and after my twins screamed their heads off for more than 2 hours and my wife had to go see a counselor because she felt like such a terrible mom due to the camera failing (disconnecting) and is not hearing them I will gladly spend money to make a point. Class action is the way to go here. Rely to this post if you would like to join forces.

Message 85 of 145

1 Kudo



rader 
Guide

2018-01-08 08:20 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I'm in. Been beyond infuriated with this issue as long as I can remember. Bought this as soon as it came out with promise of the dedicated monitor. Basically don't use in the house. Where is the promised monitor? I bought in to Arlo ecosystem because of baby. Would have gone another way likely had I known this. About \$850 invested in 5 cameras plus baby. NETGEAR, you need to make this right.

Message 86 of 145

0 Kudos



bradpeschel 

Aspirant

2018-01-10 10:11 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

It appears that Netgear has released a new model number of the Arlo Baby with Apple HomeKit at CES. The landing page for Arlo Baby shows it to be Coming Soon.

ABC1000A vs ABC1000R6

I see that current cameras will have a firmware update pushed. Hard to tell if there are any differences to the hardware.

Message 87 of 145

0 Kudos

[Reply](#)



F2W12 
Guide

2018-01-10 03:50 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

+1 Thomas


I bought this thing via preorder and have suffered through the issues ONLY because of the promise of the dedicated tablet. And as each release date gets pushed further out, I find myself, almost a year later, wondering why I have put up with this for so long. We've all apparently been duped, and at the expense of our children. If they don't fix this, and soon, they'll have another customer seeking restitution through any and all legal means available to me.

Message 88 of 145

0 Kudos

[Reply](#)



pobo123 
Guide

2018-01-10 06:15 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

dsmythe wrote:

I have had the Arlo Baby for several months now and I love it. It would be a tad nicer with the monitor too, but it's great without it and it's functionality, while imperfect, is largely fantastic. I looked at my neighbor's monitor the other day and it was vastly lower quality and without the vast majority of the features. My brother in law has gone through at least a few monitors with each breaking and being lower quality to my single one. I love that I can check on my little one with push alerts on my phone anywhere and I can take the Arlo Baby everywhere I'm going with wifi. I love that it can distinguish between regular audio (sometimes he babbles in bed) from crying (he needs me). Not to mention the white noise/other tunes, night light, air quality, humidity monitor and temperature gauge. I've done video chats with my wife and our baby. It's a great product. I use my phone and iPad as monitors and while I can't stream video for hours, I've never had a problem streaming audio for hours/all night (often when I sleep). I suspect at least a few complaints might relate to being unfamiliar with the functionality of the app (like being able to turn on audio that doesn't time out easily vs. video that can) and becoming upset, rather than looking up how it works. The Arlo Baby has a surprisingly large number of features and controls and this can result in having trouble learning all of them, but once you know them, they're great.

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complain that Netgear is trying to make sure it works optimally before release (i'd rather them wait than release something that works poorly). It is to their advantage to release a fully working product and in no way to their advantage to screw anyone over.

Here is where it is listed separately and has been since the start! <https://www.arlo.com/en-us/products/arlo-baby/display-monitor.aspx>

Message 89 of 145

0 Kudos

Reply



rwinter 
Tutor

2018-02-12 01:57 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

On the arlo baby page, it's now listed as a combo available Spring 2018, for an additional \$150.

--

Description

This Arlo Baby combo set will be available for purchase in Spring 2018. Join our pre-order list for future updates on availability!

<https://www.arlo.com/en-us/products/arlo-baby/default.aspx>

Message 90 of 145

0 Kudos

Reply




DavidsonMK 

Initiate

2018-02-15 12:21 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Got the email saying I could pre-order my Arlo security light. Wouldn't it be nice to get the email that says "Here's your free Touch Screen Monitor for being such a loyal customer. Sorry that your baby is almost a year old." 

Message 91 of 145

0 Kudos

Reply



kaza86 

Aspirant

2018-02-17 04:41 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Can netgear please provide an update on this item? I also bought on the promise this screen was "coming soon"

Message 92 of 145

0 Kudos

Reply



Brett37 

Tutor

2018-02-20 10:30 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I also purchased the Arlo Baby on release with the promise of the dedicated monitor to come out shortly after. That was in May 2017. My son is already 9 months old and I do not even use this camera. I cannot return it. I tried to use it for a short period but it kept disconnecting along with the delay. I prefer not to drain my phone battery. I only bought because the monitor was suppose to come right after. I ended up buying another camera with a dedicated monitor that we use. Very dissappointed.

Message 93 of 145

0 Kudos

Reply



F2W12 
Guide

2018-02-22 11:26 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

@JamesC It's been another 2 months since your last update of having no update. My daughter is almost 10 months old and I've had to buy additional products from other companies to help supplement your seriously flawed product. I would have returned this thing long ago had I known that each delay would cause the release date to continue to be pushed back further and further until I no longer had the option. Each time there was a delay, I gave you people the benefit of the doubt, that the next "projected" release would be accurate.

I want to know right now what the projected release date is, as well as what you are going to do to compensate all those who have had to suffer through these issues with no updates, little support, an complete indifference.

Message 94 of 145

0 Kudos

Reply



Moodyj 
Aspirant

2018-02-22 12:36 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Although I am quite upset about the multiple delays from the company I can appreciate that this can happen. It still indicates poor planning, poor project management, and from what I have seen poor communication with your customers thus jeopardizing our trust in you.

So while I am upset, I simply had to jump ship and sell my (3 days out of Best Buy return policy) monitor for a 30% loss in value. I still believe in the company but I no longer am invested in your ecosystem and if you could do something to make this right that would be great.

Jon,

Message 95 of 145

0 Kudos

Reply



Pmrodriguez 
Guide

2018-02-25 06:58 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Is there any information on when the touch screen monitor will be available for the arlo baby? The last I've seen is summer of 2017. And that has long past.

Message 96 of 145

0 Kudos

Reply



Thomaswgoodwin 
Star

2018-03-03 08:57 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

This is incredibly dissapointing. I have been a NETGEAR customer ever since I can remember. I have been sitting on a slew of Arlo Pro 2 cameras that I purchased in hopes to set up a new security system when my first child arrived in February. However, this thing has been so poorly managed by NETGEAR that I may be forced to figure out how to return all of my cameras to either Bet Buy or directly to NETGEAR. My daughter deserves better than this, as does all the poor people that bought the Arlo Baby under the guise thy the product would be made whole within a reasonable time. NETGEAR really needs to step it up here. Otherwise, I will be looking to recoup the roughly \$1,000 I have into the Arlo system as well.

Message 97 of 145

0 Kudos

Reply



mwittkopp89 
Tutor

2018-03-04 08:29 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

i have had the Arlo Baby now for about three months and we have had out little one now for about three weeks. We also have a set of Arlo Pro cameras around the house. In the limited time we have used it, we have managed to get by without the tablet for the following reasons.

1. Arlo motion and sounds notifications are clutch and work very well and are very reliable.
2. We have a Amazon Echo Show, that is integrated with Arlo and allows us to bring it up on the screen. Its glitchy but once its running it works well. I am sure Amazon and Arlo will work out the glitches over time.
3. Just recently, Arlo integrated with Chromecast so you can view the Arlo stream on your TV if you have a Chromecast. That features has been really nice as well - It too is glitchy but over time it should fix itself.
4. If we want to have a live stream up with limited delay, we use an old cellphone of ours that has been reset to only have the Arlo App on it.

Note: There is about a 5-10 delay when viewing via Echo Show or via Chromecast but that hasn't really bothered us. Our delay on our phones is down to a little under 2 seconds so we haven't really had any issues that way.

These are the ways we have managed without the dedicated tablet. We do hope they release it at somepoint but until then we are making due without. The features (music, night light & sensors) & stream quality definitely outweigh the negatives we have experienced. This monitor in my opinion is still the best on the market and will only get better once and if they finally release the tablet.

Message 98 of 145

0 Kudos

Reply



JamesC 
NETGEAR Moderator

2018-03-14 09:39 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Dear Arlo Baby user,

First of all, we would like to thank you for being an Arlo Baby customer. We hope that this product has been a valuable addition to your family and keeping you close to your little one. Our ultimate goal has been to create the best, most innovative smart baby monitor in the market. Since the product launched in May 2017, our product and engineering teams have been working on improving connectivity, response time, and adding background features to make using Arlo Baby a delight for you to use every day. We recently launched our integration with Apple HomeKit to provide even more ways for you to make the most out of the product.

We wanted to let you know that we no longer plan to release a dedicated display monitor. Instead, we are offering people who bought an Arlo Baby a \$30 coupon for an [Amazon Fire HD 8 Tablet \(16GB, With Special Offers\)](#), redeemable on Amazon.com. We think this tablet is a great alternative to the Arlo Baby Touchscreen Display. It works great with the Arlo app, offers great image and audio quality, and is Alexa-enabled so you can take advantage of the voice control capability offered by Amazon Alexa. If you would like to take advantage of this offer, please reach out to the [Arlo Customer Support team](#). Please be prepared to provide your name, email address, and your Arlo Baby serial number/MAC address which can be found under the camera. Once our team has been able to verify your ownership of an Arlo Baby camera, we will respond to you with a one-time use coupon. This offer is only available to owners of Arlo Baby cameras registered before March 31, 2018.

Warm regards,
The Arlo Team

Message 99 of 145

Tags (3)

- Tags:
- NOT SOLVED
- Pathetic
- typical netgear

0 Kudos

Reply



farrellw 
Guide


2018-03-14 09:51 AM

Re: Arlo Baby and Dedicare Touch Screen Monitor

While this is great in theory, what about those of us that have already done this. I don't need another tablet. I want a refund for the product that was supposed to be a complete solution. Please contact me at your earliest convience to reutrnr all said arlo baby products, so I can find another solution that will work.

Thank you,

Message 100 of 145

Thomaswgoodwin 
Star

2018-03-14 09:51 AM

Re: Arlo Baby and Dedicare Touch Screen Monitor

Un-freaking-believable!!


How about you all buy all of my Arlo cameras back if you can not get a direct connection mode established? Or how about you all provide a coupon for a competitors product that will provide a direct conection without WiFi? This ability has been promised, and is needed by my family when we travel to

places without WiFi such as my in law's home. Most of us already have an iPad or other such devices. Being provided a small coupon for something that is a redundancy of a WiFi required connection is not an acceptable solution.

Message [101](#) of 145

0 Kudos



[F2W12](#) 
Guide

2018-03-14 09:59 AM

Re: Arlo Baby and Dedicat Touch Screen Monitor

No.

Just no.

I don't need another tablet. I don't want another tablet.

What I want is what was promised - a dedicated monitor that connects to the Arlo Baby that circumvents having to connect through wi-fi. Wi-fi is imperfect and susceptible to any weak link in the process - Arlo hardware, phone/tablet hardware, ISP speed and reliability. What this tablet was to do is make the Arlo Baby reliable. And now you're telling me is that I have to rely on a safety device that cannot ensure that reliability.

I want a full refund of your product. Please contact me to set that up immediately.

Message [102](#) of 145

2 Kudos

[Reply](#)



Brett37
Tutor

2018-03-14 10:29 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I do not accept a \$30 coupon. If that is the only solution, it should be for the full cost of the tablet. I bought this with the promise of a direct connect monitor. I do not want it on wifi.

I want a full refund for the camera. Please let me know how to do this.

Thanks.

Message [103](#) of 145

1 Kudo

[Reply](#)



dsmythe
Tutor

2018-03-14 10:35 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Netgear, bummer. Thanks for the heads up. Sorry it didn't work out. I know we all (you and us) which is had. My Arlo Baby works so well over wifi and my iOS device, my wife and I weren't sure we needed the dedicated tablet after all. The Arlo Baby been thoroughly wonderful for us. I appreciate the offer of the coupon.

Message [104](#) of 145

0 Kudos

[Reply](#)



[pobo123](#) 
Guide

2018-03-14 10:36 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

This is absolutely NOT an acceptable solution with the premise that this camera system was sold with a dedicated tablet coming. I have already bought a tablet, i don't want another one. I strongly suggest you offer full refunds to those that desire it. Please post your reply to this immediately.

Message [105](#) of 145

2 Kudos

[Reply](#)



[Brett37](#) 
Tutor

2018-03-14 10:38 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I am in!

Message [106](#) of 145

0 Kudos

[Reply](#)



[rwinter](#) 
Tutor

2018-03-14 10:42 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I didn't actually buy this camera, but as a result of this announcement I can no longer sleep at night, I have lost my job, my wife left me, my dog died, I am now homeless and it has triggered the rapture which will result in my soul burning in hell for all eternity.

I demand compensation for my ongoing pain and suffering. Please contact my ASAP to organise this.

Regards

Message [107](#) of 145

Tags (2)

- Tags:
- [burn in hell](#)
- [rapture](#)

0 Kudos

[Reply](#)



[Pmrodriguez](#) 
Guide

2018-03-14 10:51 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Not very satisfied at the moment. Considering I am burning out my iPad Pro with constant monitoring and connection is lost at least twice a week through WiFi. I am really regretting this purchase. I have been waiting for at least a year if not more to be told sorry it's not going to happen?

Message [108](#) of 145

2 Kudos

[Reply](#)



[tunguyen](#) 
NETGEAR Expert

2018-03-14 11:11 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Hi [@F2W12](#),

The Arlo display was design to use WiFi to communicate directly with the Arlo Baby camera (through WiFi Direct), so the limitations you stated in your post would still apply. As we worked on this WiFi Direct route, we found that these limitations could not be completely mitigated and the user experience, at the end of the day, would not be where we want to deliver to you.

Unfortunately, we are not able to offer a full for the camera, but we hope that the alternative display solution will help.

Best,

Tu

Message [109](#) of 145

0 Kudos

[Reply](#)



[Pmrodriguez](#) 
Guide

2018-03-14 11:20 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor


I'm sorry but your customer service is horrible. I wasn't looking for a full refund. Nor do I have connectivity issues with anything else in my home other than the arlo. So it is not an issue with my WiFi. If this is your response to an expectation the consumers had to your products I don't think I want to be associated with this brand any longer. I'll just take it as a loss and move on to a brand more reliable and sensitive to their customers issues.

Message [110](#) of 145

2 Kudos

[Reply](#)



Thomaswgoodwin 
Star

2018-03-14 11:30 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Over an hour on the phone. Took me over 54 minutes to even speak with a manager. For the rest of that time, we discussed how this solution is not universal, and how a discount on a product that many people do not want, as well as does not fix the issue with direct connectivity. I was repeatedly told, "Netgear does not do refunds." I was also told that this "Level 2" was the top tier for issues such as this. There is a "Level 3" but that only applies to technical issues with products. I let him know that I was very likely to buy Nest cameras before the Arlo Baby was released. I know how 3 Arlo Pro 2, one Arlo Q, and one Arlo Baby, that are unreturnable to the retailer. The only acceptable fix here would be the following:

1. Refund the cameras
2. Offer a replacement that has direct connectivity.
3. Offer a compensation that is not limited to a specific device that solves no issues.

The supervisor said he would relay the information. God only knows how long until I hear something back. I know there is about a zero chance that Netgear refunds me for all of my cameras. The more likely, unfortunate solution, would be to offer compensation that is not restricted to some tablet that I have no need for. I have a need for a high quality direct connect baby monitor. I suggest that all of the frustrated people voice their dissatisfaction. This is false advertisement, and it has rendered many of us with entire systems that now


no longer work as advertised. All the while, they have been developing new devices that integrate with Apple Home Kit.



Message [111](#) of 145

2 Kudos



[BigJim378](#) 
Tutor

2018-03-14 11:32 AM


Re: Arlo Baby and Dedicare Touch Screen Monitor

As a long time Netgear reseller and user, this is very disappointing. I have no need for another tablet as my family already own 3 of them, so your solution of a \$30 coupon is not a fair solution. The stand alone tablet was the deciding factor for me when making my purchase. I would also like to see a gift card to be used on Amazon instead of a coupon. I also will not be recommend your products anymore, and will no longer be purchasing any Netgear items. I feel as if this whole tablet/Arlo Baby has been mismanaged from day one.

Message [112](#) of 145

3 Kudos



BigJim378 
Tutor

2018-03-14 11:49 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor


I am happy to see that you are monitoring these replies and editing them to your liking....yet another reason I will not be recommending any Netgear products to any of my customers any more.

Message [113](#) of 145

1 Kudo

[Reply](#)



pobo123 
Guide

2018-03-14 11:52 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Netgear Moderator,
you can continue to modify my posts, removing the reference that if a full refund is not offered to me as a customer, i am prepared to file a class action suite for the class affected on the basis of false advertising, misleading claims, and fraud. I will continue to post this to this forum (and to others that you can't delete). As i mentioned, you have 10 days to provide a formal response from 3-14-2018. This is a bad look for you, and modifying posts that your users are making is even worse. You are just digging yourself a bigger hole. Remember your own forum design, each time a post is put here, it emails EVERYONE that post. Good luck keeping up with your pissed off customers responses.

Message [114](#) of 145

6 Kudos

[Reply](#)



F2W12 
Guide

2018-03-14 12:09 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

[@tunguyen](#)

What?

The Arlo Baby Display is designed for an uninterrupted baby monitoring experience, so you can use your smartphone for other tasks. With this large 7" touchscreen display, the **Arlo Baby camera can also be used offline, without the need for an internet connection, just like a traditional baby monitor.** Take the Arlo Baby camera and display anywhere you want and still enjoy many of the available smart features **even when a WiFi connection is not available.**

... and from a post here on the forums by JamesC and ChristineT

In its Direct Connect mode, the display will allow for live streaming of video from the Arlo Baby camera **without the need for an Internet connection.** Cloud features such as remote live streaming and Library access will not be available from the tablet in Direct Connect mode. The display can also connect to the cloud via WiFi, just like a regular smart tablet. When connected to WiFi, the tablet will have all the cloud features as you would expect from the Arlo mobile app, and allow you to access all devices on your Arlo account.


Again, I demand a full refund. Or at least a refund of the proposed cost of the new defunct tablet.

Message [115](#) of 145

3 Kudos

[Reply](#)



[Thomaswgoodwin](#) 
Star

2018-03-14 12:17 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


[@tunguyen](#) This is categorically false. As [@F2W12](#) has already posted, the advertisements clearly stated that an internet connection would not be needed. Whether that was some word play to say no internet connection was needed while WiFi would have been, or a complete oversight by yourself, no internet connection was promised to be a capability of the device.

Message [116](#) of 145

0 Kudos

[Reply](#)



[Pmrodriguez](#) 
Guide

2018-03-14 12:23 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Thank you for posting this. To be told it wouldn't have helped my connectivity issues was a slap in the face.

Message [117](#) of 145

1 Kudo

[Reply](#)



[Thomaswgoodwin](#) 

Star

2018-03-14 12:25 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Just a reminder of that since they seemed to have forgot a very obvious problem. You can not silence the thoughts of a class action suit by editing your members posts, such as you did [@BigJim378](#). The deleted portion is highlighted.



Message [118](#) of 145

0 Kudos

[Reply](#)



[tunguyen](#) 
NETGEAR Expert

2018-03-14 12:30 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Hi [@Thomaswgoodwin](#), [@F2W12](#),

Our design for the display aimed to create the direct connection between the display and camera using WiFi Direct, and would not require an internet connection. WiFi Direct connection is subject to interference from the surrounding environment, and although we applied mechanisms to overcome some of the limitations, others remained.

Best,


Tu

Message [119](#) of 145

0 Kudos

[Reply](#)



[Thomaswgoodwin](#) 
Star

2018-03-14 12:32 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Which means I could have taken a spare netgear router to my in-laws rural home and set up a private network without internet, correct? [@tunguyen](#)

Message [120](#) of 145

0 Kudos

[Reply](#)



[Brett37](#) 
Tutor

2018-03-14 01:11 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

You cannot just edit a post you do not like. As [@pobo123](#) said, we all get emails with the original post. I am including the post you deleted about the class action below. I am joining in if/when it happens unless you refund all of us our original purchase price of the Arlo Baby. You mislead us for almost a year with false advertising. I even had to buy a different baby monitor with dedicated display since my Arlo Baby always disconnected and I could not trust it anymore.

"Hi Brett37,

pobo123 (Tutor) posted a new reply in Arlo Baby on 2018-03-14 01:36 PM :

This is absolutely NOT an acceptable solution with the premise that this camera system was sold with a dedicated tablet coming. I have already bought a tablet, i don't want another one. I strongly suggest you offer full refunds to those that desire it. If Netgear chooses not to go down this path, I am prepared to file a class action lawsuit against Netgear for false advertising, misleading claims, and fraud. Please post your reply to this immediately. If no reply is received within 10 working days from 3-14-2018, i will proceed with legal action on behalf of the class that has been affected. "

Message [121](#) of 145

1 Kudo



[mwittkopp89](#) 
Tutor

2018-03-14 01:44 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

WIFI direct would have been similar to how Panasonic Camcorders or GoPros transmit their images to cell phones, am i correct?

So I assume that this WIFI direct capability still exists in our cameras and is just disabled. Why not enabled it for people to stream directly to cell phone, tablet or other wifi device and they would just have to deal with the limitations. AKA, If I know that when I connect to my ARLO baby via WIFI direct and I am limited to 30 feet (or w/e the limit) I think that is a better option then not allowing it at all. This would not require a internet connect. If its the

same as the GoPro or panasonic video camera, they do not require a wifi data connection to work.

Just a thought.

Message [122](#) of 145

1 Kudo

[Reply](#)



[tunguyen](#) 
NETGEAR Expert

2018-03-14 02:09 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Hi [@mwittkopp89](#),

Yes, what you described is similar to what would have been put in place for Arlo Baby and the display monitor. As you probably already know, when you connect your smart phone to a WiFi Direct network, you lose your internet connection. Your phone at this point only connects to the master device (the camera in this case). This solution is ok if you only need temporary connection with a device to transfer files for example, but not feasible as a solution for video monitoring. This was why we needed a dedicated device to make the solution possible.

Best,

Tu

Message [123](#) of 145

0 Kudos

[Reply](#)



F2W12
Guide

2018-03-14 03:51 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

[@tunguyen](#)

Please tell me how a dedicated monitor would suffer the same limitations that I explicitly outlined.

Phone/tablet hardware/software issues should be minimal because it would be with a Arlo tablet with Netgear support, without the proprietary UI and hardware from Apple and other manufacturers you would have had to navigate and ensure compatibility. Plus, I would hope the dedicated monitor would have been less complex, both hardware and software-wise than say, an iPad.

Also, ISP issues would be nil since WI-FI P2P, which is what WI-FI direct is, is essentially a WI-FI connection directly between devices. It cuts out the ISP and any router or other external hardware completely.

What I find so hilarious is you said that based on the limitations, you couldn't provide a suitable tablet experience. Why didn't you explore that before promising it to consumers, and marketing the Arlo Baby with this feature that was an absolute selling point to most of us? And it's equally hilarious that you actually believe that by not delivering on your promise and trying to offer a measly coupon to the consumers that all probably already own tablets (Who on here doesn't already own a tablet? Seriously?) and doesn't actually solve any problem is somehow compensation for dealing with all of the technical missteps you've made, and is somehow an actual "solution" for this huge tablet cluster. Look at this thread! This is more traffic than your boards have received probably ever. We're NOT satisfied with this "solution."

Again, I demand a refund.


PS, I have a number of conversations and transcripts (chats, calls, etc.) saved that contain numerous promises related to the release of this tablet. I'm sure they will help to establish the narrative in the inevitable action that's to follow..

Message [124](#) of 145

1 Kudo

[Reply](#)



Thomaswgoodwin 
Star

2018-03-14 07:46 PM


Re: Arlo Baby and Dedicate Touch Screen Monitor

How ironic.... My AT&T internet is down tonight and I can now not monitor my three week old because my camera will not connect and there is no direct connect method. FANTASTIC!! Bring on that class action lawsuit. The class will be huge!!

Message [125](#) of 145

1 Kudo



Steph44 
Guide

2018-03-14 08:28 PM


Re: Arlo Baby and Dedicate Touch Screen Monitor

I would like to just be able to return it. I have been patient waiting for the direct connect tablet. I really thought this would be the perfect monitor. I truly don't understand how, in 2018, it takes 30+ seconds to connect AND you couldn't deliver on your tablet promise. Just let people return the **bleep**ty product.

Message [126](#) of 145

2 Kudos



Pmrodriguez 
Guide

2018-03-15 07:02 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Am I the only one having serious issues with this baby monitor since yesterday when all most found out the monitor was never coming? My arlo app keeps going completely white. I have to keep signing in. It's almost like Netgear is messing with everyone's camera because we got pissed they wouldn't honor their initial offer. I've had consistent issues but now this thing is really not working right.

Message [127](#) of 145

1 Kudo

[Reply](#)



[farrellw](#) 
Guide

2018-03-15 07:46 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor


Agree 100%. Mines been acting up last 4 days. Disconnects nightly and won't reconnect until I power cycle it which is a blast since my daughter is in bed. It's been very frustrating to use this week. Don't know if there was an update that's screwed up or what

Message [128](#) of 145

2 Kudos

[Reply](#)



[F2W12](#) 
Guide

2018-03-16 04:56 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Look at the other threads on this message board. Lots of people have been complaining of constant issues since the last update.

And Netgear wants us to believe that getting a \$30 coupon towards an Amazon tablet is supposed to make up for this thing essentially being a expensive, albeit cute, paperweight?

Just give us our money back.

Message [129](#) of 145

2 Kudos

[Reply](#)



[uunnzz](#) 
Aspirant

2018-03-17 07:42 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

What a fail! Can you guys at least enable P2P mode on the camera so I can use a better app to monitor it? With the recent updates the Arlo app on Android can't stay connected to the camera and many times won't connect to begin with. For all of you who want a better solution you should get a WyzeCam camera (~\$25) and use TinyCam Pro (~\$4). You would also need a micro SD card if you would like to record automatically on the camera. The only things it doesn't do is monitor temperature and humidity, and doesn't play music. It does make up for that in other ways like having P2P (direct local connection to the camera - does not have to use the internet), picture-in-picture mode on your phone/tablet (dunno if this works on Apple devices), background audio, customizable audio/motion alerts. It also allows you to create a shortcut directly to a camera so you just need one tap to get to it, which can also be done with tap and hold (3D touch on Apple... lol) and selecting a camera from the menu that pops up from the app icon. Sad that a \$30 solution works better for me than the Arlo camera and app. I wish I could get a refund and buy a normal baby monitor for 20% of the cost or just keep using my WyzeCam solution.

Message [130](#) of 145**0 Kudos**[Reply](#)

[UpsetCustomer99](#) 
Tutor

2018-03-20 01:11 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I'm here to pass along my support to all of the other loyal Netgear customers that were affected by Netgear's most recent show of extreme unreliability and complete indifference to customer concerns. Many customers, myself


included, have been waiting patiently for Netgear to fulfill their advertised commitment only to find that we've been duped. The Arlo Baby is now officially not able to operate in the manner that it was initially advertised. I, along with many others, have screenshots of all of the advertisements and comments from moderators stating that the Arlo Baby would eventually function in a direct connected manner that would allow for its use in locations without wifi. Like so many others, I would not have purchased this product had it not been for this promised eventual capability/functionality. Now that it has been announced that this advertised functionality will no longer be available, I will be forced to purchase other equipment. The product is no longer able to be returned to the retailer that it was purchased from. I would like a complete refund and to return my Arlo Baby to Netgear or will be forced to participate in legal action with the other customers that were deceived.

Please respond ASAP.

Message [131](#) of 145

1 Kudo



[pobo123](#) 
Guide

2018-03-20 01:19 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

directly from their webpage - download the pic to the right so you can see how badly everyone was duped. Clock is ticking Netgear!

Message [132](#) of 145

[Arlo Baby1.jpg 142 KB](#)

0 Kudos

[Reply](#)



[rwinter](#) 
Tutor

2018-03-20 01:23 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

If there was any advertising on the packaging, or contents saying this would work with a future planned product (the remote screen), you could probably return the product to the reseller under the implied warranty law.

Message [133](#) of 145

0 Kudos

[Reply](#)



[UpsetCustomer99](#) 
Tutor

2018-03-20 01:32 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I don't recall that there was any reference but I will check when I return home. I'm sure they were careful to not include this on the Arlo Baby packaging. Worth a look nonetheless.

Edit: Nothing on the packaging it seems, however the attached screenshot is of physical, printed media that came with my Arlo Baby. See screenshot.


Message [134](#) of 145

[2018-03-20 15.33.13.jpg 1830 KB](#)

0 Kudos

[Reply](#)



[farrellw](#) 
Guide

2018-03-20 01:36 PM

Re: Arlo Baby and Dedicare Touch Screen Monitor

The only reference on the box that is even close is wording that says "View from Anywhere, Anytime" located above the packaging window and on the side of the box. On the side it also adds "Keep an eye on your baby using the Arlo app to watch, listen in, and talk using your smartphone, tablet or computer." There are no other references to dedicated monitors, direct connect etc on the box.


Also as an added downfall to their claims on the bottom of the box under requierments, it lists High-Speed Internet, WiFi Connection and AC Power.

Message [135](#) of 145

0 Kudos

[Reply](#)



[F2W12](#) 
Guide

2018-03-20 02:06 PM

Re: Arlo Baby and Dedicare Touch Screen Monitor

I also have the above-referenced card within the packaging promising the release of the tablet.

But even if there was nothing on the box or included in packaging, I like many others here pre-ordered the Arlo Baby based solely on electronic advertising, before a box even existed. I relied on this marketing, as well as subsequent

promises made on here as well as through social media, chat, email, and phone calls with Arlo Support. I even recall a phone conversation I had with someone from support several months ago where that associate told me that he was receiving training on the dedicated tablet in the upcoming days because it was to be released within a few short weeks. And look where we are now!

I have had to suffer through the black screens, lost connections, latency, pixelation, and failed update after failed update (like the current one) that each only has worked to erode any and all positive progress that was previously made. All of these are completely unacceptable issues to have with a baby monitor, but I continued to stay with the product ONLY because of the promise of a dedicated tablet. Now not only is the tablet being scrapped altogether, but now they're trying to dupe me a second a second time by saying that the product wouldn't have even lived up to my expectations anyway. I was led on for a year. How naive of me.

Give us the option to get our money back Netgear.

I even bought the later-released stand (why did that take 9 months to release anyway) and the cute little kitty outfit. I'll gladly take a loss on these to get my money back for the camera right now, so that I can quickly give my business to someone who actually knows what they're doing.

Message [136](#) of 145

1 Kudo

[Reply](#)



rwinter 
Tutor

2018-03-20 02:09 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

How about the [products datasheet](#). The screen is still listed as an "excellent addition" accessory.



Message [137](#) of 145

[Capture.PNG 70 KB](#)

0 Kudos

[Reply](#)



rwinter 
Tutor

2018-03-20 02:14 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

[@F2W12](#) wrote:

I also have the above-referenced card within the packaging promising the release of the tablet.

But even if there was nothing on the box or included in packaging, I like many others here pre-ordered the Arlo Baby based solely on electronic advertising, before a box even existed. I relied on this marketing, as well as subsequent promises made on here as well as through social media, chat, email, and phone calls with Arlo Support. I even recall a phone conversation I had with someone from support several months ago where that associate told me that he was receiving training on the dedicated tablet in the upcoming days because it was to be released within a few short weeks. And look where we are now!

Yes, but if the product packaging itself includes a promise that is unfulfilled: "(f) conform to the promises or affirmations of fact made on the container or label if any."

Or if the seller knows of a particular purpose that the device ends of not fulfilling:

"Where the seller at the time of contracting has reason to know any particular purpose for which the goods are required and that the buyer is relying on the seller's skill or judgment to select or furnish suitable goods, there is unless excluded or modified under the next section an implied warranty that the goods shall be fit for such purpose."

then, assuming you haven't waived your rights to the implied warranty, you can just return it to the place of purchase and ask for a full refund.

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1 Kudo

[Reply](#)



[UpsetCustomer99](#) 
Tutor

2018-03-20 02:52 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

As a Bestbuy Elite+ member, I reached out to the dedicated team and expressed my issue with the product and the way Netgear has handled the situation. Explained the product is no longer able to function as advertised without a dedicated monitor. They were not willing to provide me with a refund exception. It was suggested that I take the product to a local store, speak with the manager and request a refund exception. I will probably see if this produces any results, even if it's store credit.


If the way Netgear has handled the concerns/complaints so far is any indication of how the new blowback will be handled, we should explore all potential options. Netgear will likely sit on their hands until they're forced to do something.

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0 Kudos

[Reply](#)



[PBJ918](#) 
Tutor

2018-03-20 07:52 PM

Re: Arlo Baby and Dedicate Touch Screen Monitor

I purchased and Arlo Q and Arlo Q Plus based on this response:

<https://community.netgear.com/t5/Arlo-Baby/Arlo-Baby-Touchscreen-multiple-cameras/m-p/1297028/highli...>

I intended to purchase the Arlo Baby with the display as soon as it was released because it would have served dual functions and fill a void in the home surveillance market. My Arlo Q's are almost as bad as the Arlo Baby, too.

Message [140](#) of 145

0 Kudos



[Elijahsupper](#) 
Aspirant

2018-03-21 05:04 AM

Re: Arlo Baby and Dedicate Touch Screen Monitor

Ive noticed that the NetGear is offering money off to put towards an amazon fire tablet for those who have Baby Moniotr. My question is can this camera connect directly to the this tablet rather than an iPad using the Bluetooth? Or rather is this an offer for those who bought the camera who were expecting the dedicated display?

As we prepare for our second baby I was looking at getting there cameras for our kids rooms but we like the idea of a dedicated monitor. When we travel and we stay in a hotel to where the kids allways have their space to sleep & we always bring our current monitor for obvious reasons.

Something tells me this will not be as easy to hook up when we travel do to probably having the cameras MAC number needing to be added for our short time there. Has anyone explored this traveling?

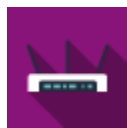
Thanks in Advance.

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Tags (1)

- Tags:
- [Before You Buy](#)

0 Kudos



[farrellw](#) 
Guide

2018-03-21 05:16 AM

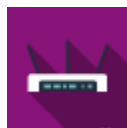
Re: Arlo Baby and Dedicat Touch Screen Monitor

It's all wifi based. When you travel you would need to setup your camera again. Once thats complete it works fine.

the coupon is striuctly for a tablet that you can use their app on. This will not allow a direct connect as they have completely taken that off the table.

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1 Kudo



[rader](#) 
Guide

2018-03-21 07:51 AM

Re: Arlo Baby and Dedicat Touch Screen Monitor


Plus one on necessary legal action. I purchased baby based on the promise of functionality that is no longer intended to be delivered. Further, I committed

to an entire Arlo ecosystem for cameras based on this same information. Netgear needs to step up and at a MINIMUM provide a full refund for the original Arlo Baby purchase.

Message [143](#) of 145

1 Kudo



[Thomaswgoodwin](#) 
Star

2018-03-21 09:58 AM

Re: Arlo Baby and Dedicat Touch Screen Monitor


My case has now been "resolved" in the eyes of Netgear. Now that they have made their stance clear, it is time to take further action.



Message [144](#) of 145

1 Kudo



[neo1981](#) 
Tutor

2018-03-21 12:10 PM

Re: Arlo Baby and Dedicat Touch Screen Monitor

I just found out as well that Arlo Baby won't be releasing a stand-alone monitor anymore. The only reason why I bought a not-so-well reviewed camera on Amazon was so that I'd have the option of using the camera via the iphone app AND the monitor w/o an internet connection.

And, of course, now the camera is out of the return window at Amazon and Netgear won't take it back.

If I had known that the stand-alone monitor isn't happening, I would've never bought this thing in the first place.

Netgear - I am more than happy to send the camera back for a full refund.

Thanks everyone for putting your feedback here! It's good to know that it's not only me who feels deceived by this entire episode.

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Tags (2)

- Tags:
- [no standalone monitor](#)
- [return arlo baby](#)

0 Kudos

[Reply](#)

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