

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

WOODBURY WIRELESS LLC,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant

Civil Action No. 2:24-cv-88
(LEAD CASE)

JURY TRIAL DEMANDED

WOODBURY WIRELESS LLC,

Plaintiff,

v.

AT&T CORP., AT&T MOBILITY LLC,
AT&T MOBILITY LLC II, and AT&T
SERVICES, INC.

Defendants.

Civil Action No. 2:24-cv-99

JURY TRIAL DEMANDED

**PLAINTIFF'S INITIAL AND ADDITIONAL DISCLOSURES
PURSUANT TO P.R. 3-1**

Pursuant to Patent Rules 3-1 Plaintiff Woodbury Wireless LLC (“Woodbury”) hereby provides its Disclosure of Asserted Claims and Preliminary Infringement Contentions Concerning Defendant T-Mobile USA, Inc. (“T-Mobile”) and Defendants AT&T Corp., AT&T Mobility LLC, AT&T Mobility LLC II, and AT&T Services, Inc. (collectively, “AT&T” and collectively with T-Mobile, “Defendants”). Woodbury reserves the right to further amend or modify its disclosures herein—including to supplement its infringement contentions pursuant to P.R. 3-6—based on additional information obtained through discovery or other means concerning the Defendants’ products or services.

I. Woodbury's P.R. 3-1(a) Disclosures: Infringed Claims

Subject to ongoing discovery and investigation, Woodbury contends that the Defendants infringe the following claims of U.S. Patent Nos. 9,496,930; 9,503,163; 9,584,197; 9,859,963; 10,211,895; 10,516,451; 11,108,443 (collectively "the patents in suit") under 35 U.S.C. § 271(a) by making, using (including without limitation testing), selling, importing, and/or offering to sell in the United States, the Accused Instrumentalities set forth in Part II below. Woodbury reserves the right to supplement its position as to infringement following further discovery and/or claim construction.

U.S. Patent No.	Claims Infringed by Each Party
9,496,930	1-14 and 16-20
9,503,163	2-67, 70-73, and 76-80
9,584,197	1-29
9,859,963	1-10, 18-24, and 26
10,211,895	1-25 and 27-29
10,516,451	1-25 and 29-33, 36-43, 50, 53-86, and 88-89
11,108,443	1-20, 22-24, 25-66, and 69-71

II. Woodbury's P.R. 3-1(b) Disclosures: Accused Instrumentalities

Subject to ongoing discovery and investigation, and based on available information obtained to date, Woodbury contends that at least the Accused Instrumentalities identified in the attached Exhibits A1-A7 (AT&T) and T1-T7 (T-Mobile) infringe the patents identified therein. As discussed in the attached charts, Woodbury contends that infringement is established through compliance with one or more standards. As a result, the charted claims are sufficient to identify Woodbury's theories of infringement with respect to all products practicing, implementing, or complying with the standards identified within each chart, whether the specific product is

identified therein or not. Additionally, as disclosed in the charts, certain claims are infringed through the provision of services that do not have a name, model number, or similar identifier.

III. Woodbury's P.R. 3-1(c) Disclosures: Preliminary Infringement Charts

Subject to ongoing discovery and investigation, and based on available information obtained to date, Woodbury hereby contends that each element of each infringed claim is found within each Accused Instrumentality as shown in preliminary infringement claim charts attached hereto as Exhibits A1-A7 (AT&T) and T1-T7 (T-Mobile). Woodbury reserves the right to amend its asserted claims and infringement contentions pursuant to P.R. 3-6 as discovery progresses and additional information is gathered.

To the extent that certain elements of the asserted claims are not literally present in each of the Accused Instrumentalities, at this time, Woodbury contends that such elements of the asserted claims are met by the Accused Instrumentalities under the Doctrine of Equivalents.

As indicated above, discovery is necessary to further develop Woodbury's infringement positions—either literal or under the Doctrine of Equivalents, and the Court has yet to issue a claim construction order. Pursuant to P.R. 3-6, Woodbury expressly reserves the right to amend and supplement its position on whether there is infringement under the Doctrine of Equivalents of any other elements of any asserted claims after further discovery from the Defendants and/or pending this Court's claim construction order.

IV. Woodbury's P.R. 3-1(e) Disclosures: Priority Dates

Woodbury contends that the asserted claims of U.S. Patent No. 9,496,930 are at least entitled to the priority date of Provisional Application No. 60/743,376, filed on Feb. 28, 2006. Woodbury further contends that the asserted claims of U.S. Patent No. 9,503,163 are at least entitled to the priority date of Provisional Application No. 60/743,376, filed on Feb. 28, 2006. Woodbury contends that the asserted claims of U.S. Patent No. 9,584,197 are at least entitled to

the priority date of Provisional Application No. 60/743,376, filed on Feb. 28, 2006. Woodbury contends that the asserted claims of U.S. Patent No. 9,859,963 are at least entitled to the priority date of Provisional Application No. 60/743,376, filed on Feb. 28, 2006. Woodbury contends that the asserted claims of U.S. Patent No. 10,211,895 are at least entitled to the priority date of Provisional Application No. 60/743,376, filed on Feb. 28, 2006. Woodbury contends that the asserted claims of U.S. Patent No. 10,516,451 are at least entitled to the priority date of Provisional Application No. 60/743,376, filed on Feb. 28, 2006. Woodbury contends that the asserted claims of U.S. Patent No. 11,108,443 are at least entitled to the priority date of Provisional Application No. 60/743,376, filed on Feb. 28, 2006.

V. Woodbury's P.R. 3-1(f) Disclosures: Right to Rely on Woodbury's Own Instrumentality

Woodbury presently does not intend to rely upon the assertion that its own instrumentalities practice the claimed inventions.

Dated: May 24, 2024

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CERTIFICATE OF SERVICE

I certify that all counsel of record are being served via electronic mail with a copy of this document on May 24, 2024.

/s/ Chad Henson
Clifford Chad Henson