

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

RIGHTQUESTION, LLC,

Plaintiff,

v.

VERIZON BUSINESS NETWORK
SERVICES, LLC, et al,

Defendants.

Civil Action No.: 2:24-cv-00091-JRG
(Lead Case)

JURY TRIAL DEMANDED

RIGHTQUESTION, LLC,

Plaintiff,

v.

AT&T CORP., et al,

Defendants.

Civil Action No.: 2:24-cv-00094-JRG
(Member Case)

JURY TRIAL DEMANDED

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**PLAINTIFF'S OPPOSED MOTION FOR LEAVE TO
AMEND INFRINGEMENT CONTENTIONS AS TO THE AT&T DEFENDANTS**



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Pursuant to Patent Rule 3-6(b), Plaintiff RightQuestion, LLC (“RightQuestion”) hereby respectfully submits this opposed motion for leave to serve its Second Amended Infringement Contentions on Defendants AT&T Corp., AT&T Mobility LLC, AT&T Mobility II LLC, and AT&T Services, Inc. (collectively, “AT&T” or “Defendants”). Redline versions of RightQuestion’s Second Amended Infringement Contentions are attached as Exhibits 1-3 to the Declaration of Nicole Glauser (“Glauser Decl.”) that is filed herewith.

I. INTRODUCTION

AT&T’s third-party vendors have recently produced information, including computer source code, that is directly relevant to RightQuestion’s claim of patent infringement and revealed for the first time critical operation and functionality of the accused AT&T instrumentalities. On this basis, among others, RightQuestion moves to amend its infringement contentions to (1) supplement its previous infringement theories to include additional information regarding the accused products, including recently-produced documents and source code from third parties; and (2) amend its theory regarding the device fingerprint limitations of U.S. Patent Nos. 10,674,009 (the “’009 patent) and 11,005,989 (the “’989 Patent”). The amendments will not introduce new accused products or additional patent claims to the litigation.

RightQuestion’s amendments are also timely and supported by good cause. As set forth herein, RightQuestion has been diligent in conducting discovery, including third-party discovery, the amendments bear directly on the issue of infringement, Defendants will not suffer undue prejudice, and a continuance is not necessary. No depositions have occurred, no claim-construction order has issued, and party and third-party discovery is ongoing.

II. BACKGROUND

On February 12, 2024, RightQuestion filed its Complaint against Defendants asserting three patents, Uthe '009, '989, and '132¹ patents. On May 15, 2024, RightQuestion served its infringement contentions pursuant to Patent Rules 3-1 and 3-2. On October 7, 2024, with leave of this Court, RightQuestion served its First Amended Infringement Contentions on AT&T. On April 28, 2025, RightQuestion served its proposed Second Amended Infringement Contentions on AT&T. Glauser Decl. at ¶¶ 2-4.

For the most part, discovery from AT&T has proceeded at a trickle. By the end of August 2024, AT&T had produced only 29 documents. Glauser Decl. at ¶ 9. As AT&T began to supplement its production, RightQuestion was able to identify several third parties that supply material services and components to AT&T and are relevant to the issue of infringement. These third parties include [REDACTED] who are contracted by AT&T to perform services deployed in the accused AT&T instrumentalities. In particular, [REDACTED]

[REDACTED] Even counsel for AT&T acknowledge that [REDACTED] recently-produced source code contains [REDACTED]

RightQuestion issued and served subpoenas on these and other third parties as discovery continued. RightQuestion served [REDACTED] on October 11, 2024, [REDACTED] on November 27, 2024, and [REDACTED] on October 21, 2024. Glauser Decl. at ¶¶ 6-8. Once each of those third parties responded to its subpoena, RightQuestion began diligently engaging with that third party to obtain discovery that is relevant and important to this matter. But in spite of RightQuestion's identification of these

¹ U.S. Patent No. 11,856,132.

to add to its infringement contentions either directly supports theories based on recently-produced documents and source code about the structure and operation of said instrumentalities or supplements RightQuestion's previously-disclosed infringement theories based on those documents and source code.

The parties met and conferred on Thursday, May 2, 2025, and counsel for Defendants indicated that they opposed RightQuestion's request for leave. Accordingly, RightQuestion now seeks leave of the Court to serve its Second Amended Infringement Contentions.

III. LEGAL STANDARD

Patent Rule 3-6(b) provides that a party may amend or supplement its infringement contentions by order of the Court "upon a showing of good cause." P. R. 3-6(b); *KAIST IP US LLC v. Samsung Elecs. Co.*, No. 2:16-cv-01314-JRG-RSP, 2018 WL 1806765, at *2 (E.D. Tex. Apr. 17, 2018). Courts in this District consider the following factors when deciding whether to allow a party to supplement its infringement contentions:

- (1) the reason for the delay and whether the party has been diligent; (2) the importance of what the court is excluding and the availability of lesser sanctions;
- (3) potential prejudice in allowing the amendment; and (4) the availability of a continuance to cure such prejudice.

Id. (citing *Motion Games, LLC v. Nintendo Co.*, No. 6:12-cv-00878-RWS-JDL, 2015 WL 1774448, at *2 (E.D. Tex. Apr. 16, 2015)). "'Good cause' is established when the balance of the four factors weigh in favor of allowing the amendment." *Keranos, LLC v. Silicon Storage Tech., Inc.*, No. 2:13-cv-00017-RWS-RSP, 2018 WL 574867, at *2 (E.D. Tex. Jan. 26, 2018), *objections overruled*, No. 2:13-cv-00017-RWS-RSP, 2018 WL 11446159 (E.D. Tex. Feb. 27, 2018).

"The infringement contentions due under this Court's local rules are intended to provide reasonable notice of asserted theories of infringement. They do not require the parties to litigate the case in the contentions. It is expected that during the course of discovery, infringement

contentions may be clarified or refined.” *Harris Corp. v. Huawei Device USA, Inc.*, No. 2:18-cv-00439-JRG, 2019 WL 4247067, at *3 (E.D. Tex. Sept. 6, 2019) (citing *Glob. Sessions LP v. Travelocity.com LP*, No. 6:10-cv-671-LED-JDL, 2012 WL 1903903, at *1 (E.D. Tex. May 25, 2012)). “Diligence is a factor, but it is not a threshold requirement that must be evaluated in a vacuum[.]” *Keranos*, 2018 WL 574867, at *2.

All the relevant factors demonstrate good cause and favor granting RightQuestion leave to serve its Second Amended Infringement Contentions.

RightQuestion prepared its original and First Amended Infringement Contentions according to its best understanding of publicly available information or the minimal discovery produced by AT&T and without the benefit of material third-party discovery. RightQuestion promptly investigated the involvement of the third parties who provide material portions of the accused AT&T system, by serving subpoenas and aggressively engaging in the enforcement of the subpoenas—a process that continues as of the filing of this motion. It was not possible for RightQuestion to amend its contentions any sooner than it did, as [REDACTED] first made critical source code available for inspection on April 8, 2025 (and has now made additional source code available for inspection on May 6, 2025), and AT&T itself produced two documents directly relevant to the “device fingerprint” limitation on April 18, 2025. Glauser Decl. at ¶¶ 13-15. The new information gleaned from those sources prompted RightQuestion to amend its contentions concerning how the device fingerprint limitations of the ’009 and ’989 patents are met by AT&T’s accused system.

'989 and '132 patents pertaining to how the accused system receives scores for performing a security determination. Glauser Decl. ¶¶ 13 & 16. Specifically, the source code and document demonstrate that [REDACTED] system includes a [REDACTED]

did not previously know and could not have previously known this proprietary information, which it now seeks leave to include in support of its infringement theories.

In similar situations, courts in this District have found diligence and good cause where, as here, the patent owner acted diligently after the infringement and invalidity contention deadlines. *See, e.g., KAIST*, 2018 WL 1806765, at *3; *Mediostream, Inc. v. Microsoft Corp.*, No. 2:08-cv-00369-CE, 2010 WL 4118589, at *2 (E.D. Tex. Oct. 18, 2010); *Realtime Data, LLC v. Actian Corp.*, No. 6:15-cv-00463-RWS-JDL, 2016 WL 9340797, at *3 (E.D. Tex. Aug. 11, 2016); *CyWee Grp. Ltd. v. Samsung Elecs. Co.*, No. 2:17-cv-00140-WCB-RSP, 2018 WL 5834148, at *6 (E.D. Tex. Nov. 7, 2018). Therefore, this factor weighs in favor of granting leave to amend the infringement contentions.

B. RightQuestion’s amendment is important to this case.

RightQuestion's addition of relevant third party evidence concerning the manner in which the accused instrumentalities infringe the asserted patents is of paramount importance. Given that third parties, at the direction of AT&T, are responsible for the implementation of large portions of the alleged infringement in this matter, the addition of source code and technical documentation only in the possession of these third parties is critical to the prosecution of RightQuestion's claims.

A review of RightQuestion's Second Amended Infringement Contentions regarding the '989 patent, for example, shows that this recently-produced information is core to the proposed

amendments.³ The same is true of the '009 and '132 patents.⁴ In fact, counsel for Defendants concur that [REDACTED] in particular is providing a key service that is “part of the accused system.” Ex. 4, Markman Tr. at 33:11-19.

With respect to the “device fingerprint” limitation in the '009 and '989 patents, the amendments raise an infringement issue that will go unresolved if the amendments are not made. Specifically, as a result of the information recently received from [REDACTED] and AT&T, the amendments identify for the first time how [REDACTED]

[REDACTED]

Similarly, with respect to the amendments relating to the “score” limitation in the '989 and '132 patents, the new information from [REDACTED] serves to specify how [REDACTED]. Specifically, the new information (including the information that [REDACTED] is still in the process of producing)

[REDACTED]

[REDACTED]

[REDACTED]

Because the addition of this newly-produced information to RightQuestion’s infringement contentions is a necessity, this factor also weighs in favor of granting leave to amend.

C. Defendants will not suffer undue prejudice.

Defendants will not suffer any unfair prejudice. Since the outset, they have been aware of the role of the third parties in providing services that are material to the issue of infringement, and the necessity of amended contentions is partly a result of the Defendants’ reluctance to provide complete discovery concerning those third-party services.

³ See, e.g., Ex. 2 at 53-75, 86-96, 112-118, 120-122, 142-151, 153-154, 156-157, 163-170, 172-178, 313, 329, 348, 379.

⁴ See, e.g., Ex. 1 at 21-23, 35-37, 44-46, 55-57, 64-70, 87-92, 100-102, 122-124, 160, 222, 369; Ex. 3 at 22-120.

[REDACTED]

First, the amended infringement contentions have no bearing on the claim construction issues that Defendants raised—whether a device fingerprint is unique and whether certain claim elements are indefinite. The new information implicated in these amended contentions is of a relatively limited scope and size, and does not overly burden Defendants, particularly given the focused nature of the amended contentions. Further, Defendants have been aware of the accused functionalities from the outset because of their working relationships with the third parties and knowledge of the call-verification services that they provide.

Second, any prejudice to Defendants as a result of the timing of this amendment is at best no fault of RightQuestion's, and at worst is the result of Defendants' (or their third-party vendors and suppliers) own discovery delays. Had AT&T adequately supplemented its discovery responses and provided thorough technical documentation concerning the relevant services rendered by third parties, RightQuestion could have subpoenaed those third parties and negotiated the scope of the subpoenas more rapidly. In any event, RightQuestion has pursued discovery from the relevant third parties aggressively and obtained discovery as rapidly as it was able, sparing no time in preparing its amended contentions.

Third, RightQuestion's addition of specific theories of infringement are directly and narrowly responsive to this newly produced information. For example, with respect to the '009 and '989 patents, RightQuestion's amended contentions allege that [REDACTED]

[REDACTED]

[REDACTED] With respect to the '989 and '132 patents, RightQuestion's amended contentions specify its infringement theories centering on the reputation score provided by [REDACTED] The remainder of the redlines are typographical edits or inclusion of additional evidence in support of the disclosed original or amended theory.

Accordingly, this factor weighs in favor of granting the instant motion.

D. Continuance is not necessary.

Given the procedural timeline, the Court does not need to order a continuance to cure any perceived prejudice because trial is not until October 20, 2025; expert discovery closes July 3, 2025; and fact discovery closes on May 23, 2025. Dkt. 63. Courts in this District considering requests to amend infringement contentions have granted leave at late stages. *See United Servs. Auto. Ass'n v. Wells Fargo Bank, N.A.*, No. 2:18-cv-00366-JRG-RSP, 2019 WL 6878880, at *2 (E.D. Tex. Dec. 17, 2019); *see also TiVo, Inc. v. Verizon Commc'ns, Inc.*, No. 2:09-cv-00257-JRG, 2012 WL 2036313, at *3 (E.D. Tex. June 6, 2012) ("Because the Court finds that Verizon will not be prejudiced by the amendment, the Court need not address the availability of a continuance to cure prejudice."). This factor weighs in favor of granting the instant motion.

V. CONCLUSION

Based on the foregoing reasons, Plaintiff respectfully requests that this Court grant leave to Plaintiff to serve its Second Amended Infringement Contentions on Defendants.

May 6, 2025

/s/ Robert F. Kramer

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), I hereby certify that counsel for Plaintiff met and conferred with counsel for Defendants prior to filing this motion. Defendants indicated that they oppose this motion.

/s/ Robert F. Kramer

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via CM/ECF on May 6, 2025, pursuant to L.R. CV-5.2.

/s/ Robert F. Kramer

CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

Pursuant to Local Rule CV-5(a)(7), the undersigned counsel hereby certifies that authorization for filing under seal has been previously granted by the Court in the Protective Order (Dkt. 40) entered in this case on July 9, 2024.

/s/ Robert F. Kramer

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**DECLARATION OF NICOLE GLAUSER IN SUPPORT OF PLAINTIFF'S
OPPOSED MOTION FOR LEAVE TO AMEND INFRINGEMENT CONTENTIONS
AS TO THE AT&T DEFENDANTS**

[REDACTED]

I, Nicole Glauser, hereby declare as follows:

1. I am a partner at Kramer Alberti Lim & Tonkovich LLP and counsel for Plaintiff RightQuestion, LLC. (“Plaintiff” or “RightQuestion”) in this action. I submit this declaration in support of Plaintiff’s Opposed Motion for Leave to Amend Infringement Contentions. I have personal knowledge of the facts set forth in this declaration and would testify competently to them if called as a witness.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the redline version of Plaintiff’s proposed Second Amended Exhibit A claim chart (infringement of U.S. Patent No. 10,674,009) served on April 28, 2025.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the redline version of Plaintiff’s proposed Second Amended Exhibit B claim chart (infringement of U.S. Patent No. 11,005,989) served on April 28, 2025.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the redline version of Plaintiff’s proposed Second Amended Exhibit C claim chart (infringement of U.S. Patent No. 11,856,132) served on April 28, 2025.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts taken from transcript of the Markman Hearing held on April 30, 2025.

6. On October 11, 2024, RightQuestion served a subpoena on [REDACTED] seeking documents relevant to this litigation and its services, products, and/or functionality deployed in the accused AT&T instrumentalities.

7. On October 21, 2024, RightQuestion served a subpoena on [REDACTED] seeking documents relevant to this litigation and its services, products, and/or functionality deployed in the accused AT&T instrumentalities.

8. On November 27, 2024, RightQuestion served a subpoena on [REDACTED] seeking documents relevant to this litigation and its services, products, and/or functionality deployed in the accused AT&T instrumentalities.

9. As of August 31, 2024, Defendants AT&T Corp., AT&T Mobility LLC, AT&T Mobility II LLC, and AT&T Services, Inc. (collectively, "AT&T") had only produced 29 documents.

10. AT&T served its initial disclosures on June 19, 2024, in which [REDACTED] was not identified as having potentially relevant information. On July 17, 2024, RightQuestion served its First Set of Common Interrogatories on AT&T, in which Interrogatory No. 9 sought the identification of third parties and their role in the design, manufacture, and/or implementation of the Accused Instrumentalities. AT&T failed to provide a substantive answer to this specific interrogatory until December 7, 2024, when it served its First Supplemental Responses and Objections to Plaintiff's First Set of Common Interrogatories. About the same time, AT&T finally served supplemental initial disclosures, identifying [REDACTED] for the first time.

11. [REDACTED] first production took place on December 6, 2024. That production consisted of a single, 8-page document that did not explain how [REDACTED]

[REDACTED] Thereafter, the parties engaged in regular negotiations.

12. On February 11, 2025, [REDACTED] produced approximately 100 pages of printed source code. That code did not disclose the relevant operation and functionality of critical portions of RightQuestion's infringement allegations and did not include [REDACTED]

[REDACTED]

[REDACTED] RightQuestion and [REDACTED] conferred further on March 7, 2025 regarding the need for additional documents and source code, and [REDACTED] agreed to make a larger collection of source code available for inspection and to produce additional documents.

13. [REDACTED] made a source-code laptop available for inspection with supplemental code on April 8, 2025, which RightQuestion began reviewing that same day. Thereafter, RightQuestion identified to [REDACTED] several additional categories of relevant source code still missing from [REDACTED] production. RightQuestion and [REDACTED] conferred about this, among other things, on April 23, 2025. [REDACTED] agreed to make additional source code relevant to each of RightQuestion's subpoena requests available. [REDACTED] informed RightQuestion on May 5, 2025 that the additional source code is available, and RightQuestion made plans for its source-code reviewers to travel to the inspection site, so that source-code inspection could resume on May 6, 2025.

14. Additionally, [REDACTED] has indicated that they are still in the process of producing relevant documents and they are making additional source code, including its [REDACTED] [REDACTED] available for inspection on May 6, 2025.

15. On April 18, 2025, AT&T served supplemental production that included two documents that are directly relevant to [REDACTED], a true and correct copy of which is attached as **Exhibit 5**; and [REDACTED] a true and correct copy of which is attached as **Exhibit 6**.

16. On April 22, 2025, [REDACTED] produce a document with the Bates label [REDACTED] [REDACTED] a true and correct copy of which is attached as **Exhibit 7**.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 6, 2025

/s/ Nicole Glauser
Nicole Glauser

EXHIBIT 1

FILED UNDER SEAL IN ITS ENTIRETY

EXHIBIT 2

FILED UNDER SEAL IN ITS ENTIRETY

EXHIBIT 3

FILED UNDER SEAL IN ITS ENTIRETY

EXHIBIT 4

FILED UNDER SEAL IN ITS ENTIRETY

EXHIBIT 5

FILED UNDER SEAL IN ITS ENTIRETY

EXHIBIT 6

FILED UNDER SEAL IN ITS ENTIRETY

EXHIBIT 7

FILED UNDER SEAL IN ITS ENTIRETY

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**ORDER GRANTING PLAINTIFF'S OPPOSED MOTION FOR LEAVE TO AMEND
INFRINGEMENT CONTENTIONS AS TO THE AT&T DEFENDANTS**

Before the Court is Plaintiff's Opposed Motion for Leave to Amend Infringement Contentions as to the AT&T Defendants. The Court, having considered the motion and applicable law, is of the opinion that good cause exists, and Plaintiff's Motion is hereby **GRANTED**.