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 VERIZON 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 Cellco Partnership d/b/a/ Verizon Wireless, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., and TracFone Wireless (collectively, "Verizon" or "Defendants"). Redline versions of RightQuestion's Second Amended Infringement Contentions are attached as Exhibits 1-3 to the Declaration of Aidan Brewster ("Brewster Decl.") that is filed herewith.

I. INTRODUCTION

In light of additional information produced by third parties contracted with Verizon during discovery, 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 related to U.S. Patent Nos. 11,005,989 and 11,856,132, and (2) amend its theory regarding the device fingerprint limitations related to U.S. Patent Nos. 10,674,009 and 11,005,989. The amendments will not introduce additional patent claims to the litigation. The amendments are supported by good cause as set forth below. Defendants oppose RightQuestion's requested relief.

II. BACKGROUND

On February 9, 2024, RightQuestion filed its Complaint against Defendants asserting three 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 Verizon pursuant to information learned during the discovery process.

That discovery process has proceeded extremely slowly. Defendants' initial production of documents was scant. As of the end of August of 2024, Verizon had produced only 218 documents

(Brewster Decl. at ¶ 13), primarily related to STIR/SHAKEN and call authentication technologies from 2017 and 2018 only. Verizon initially balked at supplementing discovery responses unless RightQuestion amended its infringement contentions, which it did on October 7, 2024. The procession of discovery led to the identification of several

RightQuestion issued and served subpoenas on these third parties as discovery continued.

The responses to these subpoenas did not come until the end of October 2024 and mid-November 2024 depending on the party, after which time RightQuestion began diligently engaging with these third parties to further the discovery process—the speed of which was partially dependent on Verizon's own unwillingness to produce documents and supplement discovery responses in a timely fashion that identified the nature and scope of the services performed by each third party. For example, it took Verizon almost five months to supplement its interrogatory responses to even acknowledge

Instead, RightQuestion was forced

[redacted]

to pursue the lion's share of relevant technical discovery through the subpoena process, which is far less expedient and efficient than first-party discovery.

[redacted] Following regular negotiations between the parties, [redacted] continued to produce documents on January 31, 2025, March 5, 2025, March 10, 2025, March 28, 2025, April 2, 2025, and most recently on April 29, 2025. *Id*. Though RightQuestion requested that [redacted] produce source code for inspection pursuant to its subpoena, [redacted] initially refused, and it was not until March 25, 2025 that [redacted] first relented and offered to take steps towards making source code available following numerous meet-and-confers. *Id.* at ¶ 12. It was not until April 14, 2025 that [redacted] first allowed RightQuestion access to the source code. *Id*.

Similarly, [redacted] did not allow access to its source code until February 11, 2025. *Id.* at ¶ 9. RightQuestion is still pursuing source code as to the interactions between third parties [redacted] and [redacted] software, the production of which is forthcoming and, as such, RightQuestion has not yet been able to review it. *Id.* at ¶ 12. [redacted] has repeatedly refused to produce any documents despite RightQuestion's attempts to negotiate otherwise, and to date has maintained this position. *Id.* at ¶ 9.

RightQuestion's amendment is decidedly relevant, and is why RightQuestion has expended significant time and effort in effectuating its subpoenas on the third parties. RightQuestion's Second Amended Contentions continue to accuse services deployed primarily by Verizon, [redacted] of infringement of the asserted patents. *See*, e.g., Ex. 2 at 26. [redacted] The information RightQuestion seeks to add

[redacted]

to its Second Amended Infringement Contentions either directly comprises theories based on recently-produced documents and source code about the structure and operation of said instrumentalities or is information identified as relevant to RightQuestion's previously-identified infringement theories as a result of review of the former.

RightQuestion's amendment is also timely—in fact, the third-party discovery process is ongoing. [redacted] is continuing to produce documents and source code, with its most recent production of documents taking place on April 29, 2025. Brewster Decl. at ¶ 11. RightQuestion reviewed newly produced [redacted] source code for the first time the week of April 14, 2025 (the first day that code was made available), and [redacted] plans to produce additional source code that it is in the process of gathering. *Id.* at ¶ 12. RightQuestion has diligently engaged with the third parties, and [redacted] and [redacted] in particular, throughout the time since its subpoenas were answered and prepared its Second Amended Infringement Contentions as soon as reasonably practicable.

On April 28, 2025, RightQuestion served its Second Amended Infringement Contentions on Defendants and informed counsel that it intended to file a request for leave to amend its contentions with this Court. The parties met and conferred on 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.

IV. ARGUMENT

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

A. RightQuestion has been diligent in reviewing third party document productions and source code.

RightQuestion prepared its original and First Amended Infringement Contentions according to its best understanding of publicly available information and without the benefit of material third party discovery. RightQuestion promptly investigated the involvement of the third

[redacted]

parties involved in the provision of relevant portions of the instrumentalities accused of infringing the asserted patents, serving subpoenas and aggressively engaging in the enforcement of said subpoenas, a process that continues as of the filing of this motion. As noted above, [redacted] have recently allowed review of relevant source code, and [redacted] in particular is continuing to gather and produce relevant documents and source code at RightQuestion's requests. It was not possible for RightQuestion to amend its contentions any sooner than now, as documents prominently featured in this amendment were only produced as recently as March and April of 2025, Brewster Decl. at ¶ 11, and relevant source code was only produced for inspection as recently as two weeks before the amended contentions were prepared and served (and well before the 30-day deadline under para. 3(a)(i) of the Discovery Order that would have applied if Verizon itself had produced the source code). Dkt. 35; *see also* Brewster Decl. at ¶¶ 11-12. RightQuestion did not previously know and could not have known this proprietary information which it now seeks leave to include in support of its infringement theories.

Courts in this District considering requests to amend infringement contentions have found diligence and good cause where 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 the instant motion.

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

[redacted]

third parties, at the direction of Verizon, 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. Importantly, Verizon has maintained throughout this case that it possesses *absolutely no source code* related to the accused instrumentalities and accordingly has never produced even a single file for inspection by RightQuestion. Brewster Decl. at ¶ 13. Similarly, given Verizon's repeated deference to third parties as the providers of the accused functionality, fulsome and up-to-date technical documentation was only accessible via RightQuestion's subpoenas. Brewster Decl. at ¶¶ 10, 6-9.

A review of RightQuestion's Second Amended Infringement Contentions regarding the '989 patent, for example, shows that this recently-produced evidence is core to the proposed amendments. *See*, e.g., Ex. 2 ('989 amended contentions) at 46-51, 99-114, 128-149[1]. The same is true of the '009 and '132 patents. *See*, e.g., Ex. 1 ('009 amended contentions) at 54-55, 70-71, 78-79, 87-91[2]; Ex. 3 ('132 amended contentions) at 30-36, 53-61, 78-84[3]. In fact, counsel for Defendants concur that [redacted] in particular is providing a key service that is at issue in this case, and third parties in general are performing major portions of the alleged infringing acts. Specifically,

[redacted] Thus, the addition of this newly produced evidence is a necessity for this instant matter and to avoid prejudice to RightQuestion.

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[1] These exemplary portions show citations to and discussion of information in source code produced April 18, 2025 and documents such as [redacted] (produced March 5, 2025) and [redacted] (produced March 10, 2025).
[2] *See* fn. 1.
[3] *See* fn. 1.

[redacted]

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

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.

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 third-party discovery 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' own discovery delays. Had Verizon adequately supplemented its discovery responses and provided thorough technical documentation, RightQuestion could have subpoenaed relevant third parties more rapidly. In any case, RightQuestion has pursued third parties [redacted] 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 patent, RightQuestion's amended contentions allege that [redacted] generates device fingerprints from a phone's contacts list so that the accused system can recognize whether a caller's number is listed in the callee's contacts list. With respect to the '989 patent, RightQuestion's amended contentions

[redacted]

specify its infringement theories [redacted]

And with respect to the ’132 patent, one of the dependent claims also relates to [redacted] The information and theories RightQuestion seeks to introduce in its Second Amended Infringement Contentions were obtained directly from or are based on the discovery it has received from [redacted] The remainder of the redlines are typographical edits or the 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

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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

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

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DECLARATION OF AIDAN BREWSTER IN SUPPORT OF PLAINTIFF'S OPPOSED MOTION FOR LEAVE TO AMEND INFRINGEMENT CONTENTIONS AS TO THE VERIZON DEFENDANTS

[redacted]

I, Aidan Brewster, hereby declare as follows:

1. I am an attorney 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 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 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 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 21, 2024, RightQuestion served a subpoena on [redacted] seeking documents relevant to this litigation. [redacted] first responded to the subpoena on October 29, 2024. [redacted] produced its first set of documents in response to RightQuestion's subpoena on January 16, 2025.

[redacted]

7. On October 14, 2024, RightQuestion served a subpoena on [redacted] seeking documents relevant to this litigation. [redacted] first responded to the subpoena on November 5, 2024.

8. On October 11, 2024, RightQuestion served a subpoena [redacted] seeking documents relevant to this litigation. [redacted] first responded to the subpoena on October 30, 2024.

9. On October 11, 2024, RightQuestion served a subpoena on [redacted] seeking documents relevant to this litigation. [redacted] first responded to the subpoena on November 15, 2024, and its source code was first made available for inspection on February 11, 2025. [redacted] has, to date, continued to refuse requests to produce any responsive documents.

10. On, July 17, 2024, RightQuestion served its First Set of Common Interrogatories on Verizon. However, it was not until December 17, 2024 that Verizon first formally identified the roles of these specific third parties in its interrogatory responses (in Verizon's First Supplemental Responses and Objections to RightQuestion's First Set of Interrogatories).

11. [redacted] has made document productions on the following dates: January 16, 2025 [redacted] January 31, 2025 [redacted] March 5, 2025 [redacted] March 10, 2025 [redacted] March 28, 2025 [redacted] April 2, 2025 [redacted] and April 29, 2025 [redacted]

12. [redacted] has made source code available for inspection by RightQuestion as a result of a lengthy negotiation process. [redacted] initially refused to produce source code for inspection pursuant

[redacted]

to the October 21, 2024 subpoena, finally relenting on March 25, 2025. On April 14, 2025, RightQuestion's experts were able to review the [redacted] source code for the first time. [redacted] has continued to search for relevant code, and has promised a production in the near future.

13. Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., and TracFone Wireless, Inc. (collectively, "Verizon") have produced a total of 1,209 documents. However, as of August 2024, Verizon had only produced 218 documents. Verizon has repeatedly maintained that it possesses absolutely no source code of relevance to the accused instrumentalities in this case and, as such, has not produced any source code for inspection by RightQuestion.

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/ Aidan Brewster
Aidan Brewster

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

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ORDER GRANTING PLAINTIFF'S OPPOSED MOTION FOR LEAVE TO AMEND INFRINGEMENT CONTENTIONS AS TO THE VERIZON DEFENDANTS

Before the Court is Plaintiff's Opposed Motion for Leave to Amend Infringement Contentions as to the Verizon 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.**