

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

RIGHTQUESTION, LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC., 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

**PLAINTIFF RIGHTQUESTION, LLC'S DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS (P.R. 3-1 AND 3-2)**

Plaintiff RightQuestion, LLC ("RightQuestion" or "Plaintiff") hereby submits its Disclosure of Asserted Claims and Preliminary Infringement Contentions ("Disclosure") with respect to Defendants AT&T Corp., AT&T Mobility LLC, AT&T Mobility II LLC, and AT&T Services Inc. (collectively, "AT&T" or "Defendants") concerning U.S. Patent Nos. 10,674,009 ("the '009 patent"), 11,005,989 ("the '989 patent"), and 11,856,132 ("the '132 patent") (collectively, the "Patents-in-Suit").

Plaintiff bases this Disclosure on its current knowledge, understanding, and belief as to the facts and information available as of the date of this Disclosure. Plaintiff has not yet completed its

investigation, collection of information, discovery, or analysis relating to this action, and additional discovery, including discovery from Defendants and third parties, may lead Plaintiff to amend, revise, and/or supplement this Disclosure. Plaintiff specifically reserves the right to amend, revise and/or supplement this Disclosure and/or accompanying exhibits in accordance with any Orders of record in this matter, Patent R. 3-6, and Federal Rule of Civil Procedure 26(e), as additional documents and information become available and as discovery and investigation proceed. Plaintiff reserves the right to supplement, modify or amend this Disclosure to include additional products or services made, used, sold, or offered for sale in or imported into the United States by Defendants.

This Disclosure is made without prejudice to any position Plaintiff may take with respect to claim construction. Plaintiff reserves its right to supplement this Disclosure and exhibits based on decisions by the Court regarding claim construction. Plaintiff further reserves the right to introduce and use such supplemental materials at trial.

The information in this Disclosure is not an admission regarding the scope of any claims or the proper construction of those claims or any terms contained therein. The production of documents accompanying this Disclosure is not an admission that such documents are admissible, and Plaintiff does not waive any objections regarding admissibility. Plaintiff reserves the right to supplement its production of documents accompanying this disclosure upon identification or receipt of additional documents, including documents from third parties.

I. DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE – PATENT LOCAL RULE 3-2

Pursuant to Patent Rule 3-2, Plaintiff identifies documents corresponding to the following categories by production number below. Plaintiff's investigation is ongoing, and it reserves the right to supplement its production as discovery in this case continues.

Category	Production Bates Numbers
Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party of joint development agreements) sufficient to evidence each discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, the claimed invention prior to the date of application for the patent in suit. Plaintiff's production of any documents as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. § 102. Patent R. 3-2(a).	None.
All documents evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the date of application for the patent in suit or the priority date identified pursuant to P.R. 3-1(e), whichever is earlier.	RQ0002124– RQ0002135
A copy of the file history for each patent in suit.	RQ0000001– RQ0001663

II. ASSERTED CLAIMS – PATENT LOCAL RULE 3-1(A)

Plaintiff asserts that AT&T has infringed and continues to infringe at least the following claims of each of the Patents-in-Suit:

Patent	Asserted Claims
'009 Patent	1 – 23
'989 Patent	1 – 28
'132 Patent	1 – 19

Plaintiff specifically reserves the right to amend, revise, and/or supplement its asserted claims and statutory bases as it acquires additional information about Defendants activities, the Accused Instrumentalities (referenced below), and any other additional Accused Instrumentalities that are identified.

III. ACCUSED INSTRUMENTALITIES – PATENT LOCAL RULE 3-1(B)

Based on information currently available to RightQuestion, RightQuestion asserts that AT&T's system(s) and/or method(s) for verifying caller identification information (corresponding to, associated with, and/or otherwise relating to, for example, voice and/or text communications), including Defendants' Call Protect, Digital Call Protect, ActiveArmor, caller identification verification mobile applications, and all other of Defendants' systems, methods, services, products, and/or devices—physical and/or virtual—that implement caller identification authentication and/or verification technology, including without limitation STIR/SHAKEN (also called “SHAKEN/STIR”) (collectively, the “Accused Instrumentalities”) infringe the asserted claims of the Patents-in-Suit. For the avoidance of any doubt, “Accused Instrumentalities” also includes all associated interfaces, software, data, digital content, electronic devices, hardware, and processes and methods related thereto.

Plaintiff has identified the Accused Instrumentalities above by the name and model or service as described by AT&T on AT&T's publicly available website, www.att.com and subpages, such as https://about.att.com/story/2019/call_validation_displays.html (RQ-ATT0000024-RQ-ATT0000026). Plaintiff's list of devices above is also based on its current investigation of publicly available models and services listed on third party websites. Neither the Accused Instrumentalities nor Plaintiff's infringement contentions are limited to the specifically listed models, networks, or services above, but also include all models, devices, platforms, networks, services, and/or iterations of the specifically listed models, networks, and services that function in accordance with the attached claim charts and/or operate in a reasonably similar manner to the technology identified in the attached claim charts. Plaintiff reserves the right to add additional products, services, and model numbers as they are identified during discovery. To the extent that AT&T has renamed its

products or services, the list of Accused Instrumentalities above should be read to include both prior naming and any renaming AT&T may adopt in the future. Plaintiff's identification of these Accused Instrumentalities is based on its current knowledge, understanding, and belief as to the facts and information available as of the date of this Disclosure. As explained above, RightQuestion believes that discovery from AT&T and others will provide additional evidence of the nature and/or scope of AT&T's infringement. Accordingly, RightQuestion reserves the right to amend, supplement, or otherwise revise the Accused Instrumentalities.

IV. CLAIM CHARTS – PATENT LOCAL RULE 3-1(C)

A claim chart for AT&T's infringement of the asserted claims of each of the Patents-in-Suit is set forth as described below:

Patent	Claim Chart
'009 Patent	Exhibit A
'989 Patent	Exhibit B
'132 Patent	Exhibit C

Plaintiff's claim charts are based on its current knowledge, understanding, and belief as to the facts and information available as of the date of this Disclosure. As explained above, RightQuestion believes that discovery from AT&T and others will provide additional evidence of the nature and/or scope of AT&T's infringement. Accordingly, Plaintiff reserves the right to amend, revise, or supplement its claim charts.

V. LITERAL INFRINGEMENT OR INFRINGEMENT UNDER DOCTRINE OF EQUIVALENTS – PATENT LOCAL RULE 3-1(D)

Each element of the asserted claims is literally present in the Accused Instrumentalities. To the extent that any limitation is found to be not literally present, or to the extent that AT&T argues that any limitation is not present, in the Accused Instrumentalities, Plaintiff reserves the right to allege infringement under the doctrine of equivalents.

VI. PRIORITY DATES – PATENT LOCAL RULE 3-1(E)

The asserted claims are entitled to the priority dates identified below. Plaintiff may rely on additional evidence to demonstrate earlier dates of conception, reduction to practice, and/or diligence in reducing to practice. *See EMG Tech., LLC v. Chrysler Grp., LLC*, No. 6:12-CV-259, 2013 WL 12147662, at *2 (E.D. Tex. July 3, 2013).

Patent	Asserted Claims	Priority Date
'009 Patent	Exhibit A	The asserted claims are entitled to a priority date at least as early as November 7, 2013, and possibly earlier than this date.
'989 Patent	Exhibit B	The asserted claims are entitled to a priority date at least as early as November 7, 2013, and possibly earlier than this date.
'132 Patent	Exhibit C	The asserted claims are entitled to a priority date at least as early as November 7, 2013, and possibly earlier than this date.

VII. RIGHTQUESTION'S PRODUCTS – PATENT LOCAL RULE 3-1(F)

RightQuestion is not currently relying on its own products or methods as practicing the asserted claims of the Patents-in-Suit.

Dated: May 15, 2024

Respectfully submitted,

/s/ Andrea L. Fair

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record is being served with a copy of the foregoing on May 15, 2024.

/s/ Andrea L. Fair
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