

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

VUSURA TECHNOLOGY LLC	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION No. 2:25-cv-00871-JRG
	§	
v.	§	
	§	
CISCO SYSTEMS, INC.	§	JURY TRIAL DEMANDED
	§	
<i>Defendant</i>	§	
	§	

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS AND PRELIMINARY
INFRINGEMENT CONTENTIONS PURSUANT TO P.R. 3-1 & P.R. 3-2 DOCUMENT
PRODUCTION ACCOMPANYING DISCLOSURE**

Pursuant to Patent Rules 3-1 and 3-2, Plaintiff Vusura Technology LLC (“Vusura”) hereby provides its Disclosure of Asserted Claims and Preliminary Infringement Contentions and Document Production Accompanying Disclosure concerning Defendant Cisco Systems, Inc. (“Defendant” or “Cisco”). Vusura 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 Defendant’s products or services.

I. Vusura’s P.R. 3-1 Disclosures

A. P.R. 3-1(a): Infringed Claims

Subject to ongoing discovery and investigation, Vusura contends that Cisco infringes the following claims of U.S. Patent No. 7,418,092 under 35 U.S.C. § 271(a) by using in the United States the Accused Instrumentalities set forth in Part I.B below and thereby performing certain methods claimed therein.

Vusura further contends that Cisco infringes the following claims of the ’092 Patent under 35 U.S.C. § 271(b) by actively and knowingly inducing, directing, causing, and encouraging

others, including, but not limited to, their designers, manufacturers, suppliers, distributors, resellers, software developers, customers, end users, subscribers, and repair providers, to directly infringe the '092 Patent through the use in the United States of the Accused Instrumentalities set forth in Part I.B below. Vusura contends that Cisco actively and knowingly induces infringement by others of the '092 Patent by, *inter alia*, providing the aforementioned direct infringers with (i) infringing functionality and/or devices that are capable of performing the method claims of the '092 Patent; (ii) manuals and guides, videos, technical documentation, technical support and assistance, advertisements and marketing; and/or (iii) software and/or firmware updates.

Subject to ongoing discovery and investigation, Vusura contends that Cisco infringes the following claims of U.S. Patent Nos. 10,198,741; and 11,227,303 under 35 U.S.C. § 271(a) by making, using, offering to sell, and/or selling in the United States and/or importing into the United States, the Accused Instrumentalities set forth in Part I.B below. Vusura further contends that Cisco infringes the '741 Patent and the '303 Patent by (i) practicing the asserted method claims of the '741 Patent and the '303 Patent in the United States, and/or (ii) by making, using, offering to sell, and/or selling in the United States and/or importing into the United States the Accused Instrumentalities set forth in Part I.B below, which practice the asserted method claims of the '741 Patent and the '303 Patent.

Vusura further contends that Cisco infringes the following claims of the '741 Patent and the '303 Patent under 35 U.S.C. § 271(b) by actively and knowingly inducing, directing, causing, and encouraging others, including, but not limited to, their designers, manufacturers, suppliers, distributors, resellers, software developers, customers, end users, subscribers, and repair providers, to directly infringe the '741 Patent and the '303 Patent by making, using, offering to sell, and/or selling in the United States and/or importing into the United States, the Accused Instrumentalities set forth in Part I.B below. Vusura contends that Cisco actively and knowingly induces infringement by others of the '741 Patent and the '303 Patent by, *inter alia*, providing the aforementioned direct infringers with (i) infringing functionality and/or devices; (ii) manuals and guides, videos, technical documentation, technical support and assistance, advertisements and

marketing; and/or (iii) software and/or firmware updates.

Vusura reserves the right to supplement its position as to infringement following further discovery and/or claim construction.

U.S. Patent No.	Claims Infringed
7,418,092	Claims 1-15
10,198,741	Claims 1, 4-8, 11-14, 17-21, and 23
11,227,303	Claims 1, 4-6, 8-11, 13-14, 17-19, and 21-24

B. P.R. 3-1(b): Accused Instrumentalities

Subject to ongoing discovery and investigation, and based on available information obtained to date, the Accused Instrumentalities include Webex Contact Center, Webex Contact Center Enterprise, any Accused Instrumentalities identified by Cisco in response to discovery requests, and any other Cisco cloud contact center product that functions in a similar manner (collectively, “Webex Contact Center”).

On information and belief, Webex Contact Center includes the Webex Contact Center Cloud in addition to Cisco hardware and software components deployed at customer, partner, or service provider datacenters in the United States. *See e.g.*, Vusura00000876-00000902, Vusura00001351-00001364. Additionally, the Accused Instrumentalities include any components identified by Cisco in response to Vusura’s forthcoming interrogatories seeking the identity of all Webex Contact Center components and any other Cisco cloud contact center product that functions in a similar manner.

Cisco both directly and indirectly infringes each of the Asserted Claims. Cisco directly infringes the asserted method claims by using the Accused Instrumentalities in the United States without a license. Cisco directly infringes the asserted apparatus claims by making, using, selling, offering to sell, and/or importing the Accused Instrumentalities in the United States without a license.

Cisco also indirectly infringes the asserted claims by inducing third parties—including Cisco’s customers and end-users of Cisco’s products—to use the Accused Instrumentalities in the

United States in an infringing manner, as directed and instructed by Cisco. For example, Cisco tells its customers that “Webex® Contact Center is an omnichannel cloud contact center solution that can transform your customers’ experience and improve your business results.” Vusura00001856. Cisco also advertises that its “cloud-based subscription” enables “rapid time to market and time to new revenue while minimizing upfront capital investment.” *Id.* Per Cisco, the Accused Instrumentalities allow customers to “[i]ntelligently distribute calls across any number of sites and locations, with ease of integration that lets you work with the channels that suite your business.” Vusura00002740. Cisco also instructs its customers on how to “migrat[e] from an on-premises to cloud contact center[.]” Vusura00001856.

Cisco has had knowledge of the Asserted Patents and knowledge of its infringement since at least the filing and service of the Complaint on August 25, 2025. Cisco’s inducement has been and continues to be willful and with specific intent to cause infringement. Cisco knew or should have known that its actions would induce actual infringement of the Asserted Patents. Despite this knowledge, Cisco continues to actively market, sell, support, and encourage the use of the Accused Instrumentalities in ways that infringe the Asserted Patents.

Vusura reserves the right to supplement its infringement contentions to identify additional products and/or services, if necessary, when it is provided with non-public documents and/or source code from third parties and/or Cisco via the discovery process.

C. P.R. 3-1(c): Preliminary Infringement Charts

Subject to ongoing discovery and investigation, and based on available information obtained to date, Vusura hereby contends that each element of each infringed claim is found within each Accused Instrumentality as shown in preliminary infringement charts attached hereto as Exhibits A through C. Vusura 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.

D. P.R. 3-1(d): Literal Infringement and Infringement Under Doctrine of Equivalents

Subject to ongoing discovery and investigation, and based on available information

obtained to date, Vusura hereby contends that each element of each asserted claim is literally present in each of the Accused Instrumentalities as specifically shown in Exhibits A through C. As indicated above, discovery is necessary to further develop Vusura'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, Vusura 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 Cisco and/or pending this Court's claim construction order.

E. P.R. 3-1(e): Priority Dates

The '092 Patent Application was filed on March 8, 2004 as Application No. 10/796,423. Based on information currently available to Vusura, the earliest priority date for the '092 Patent is March 8, 2004.

The '741 Patent Application was filed on April 1, 2016 as Application No. 15/089,098, which is a continuation-in-part of Application No. 14/951,351, filed on November 24, 2015, which is a continuation-in-part of Application No. 14/327,325, filed on July 9, 2014, which is a continuation of Application No. 14/041,879, filed on September 30, 2013, which is a continuation of Application No. 12/563,112, filed on September 18, 2009, which claims the benefit of U.S. Provisional Application No. 61/167,105, filed on April 6, 2009. Based on information currently available to Vusura, the earliest priority date for the '741 Patent is April 6, 2009.

The '303 Patent Application was filed on October 9, 2019 as Application No. 16/597,052, which is a continuation of Application No. 15/790,949, filed on October 23, 2017, which is a continuation of Application No. 14/951,399, filed on November 24, 2015, which is a continuation of Application No. 14/327,332, filed on July 9, 2014, which is a continuation of Application No. 14/041,879, filed on September 30, 2013, which is a continuation of Application No. 12/563,112, filed on September 18, 2009, which claims the benefit of U.S. Provisional Application No. 61/167,105, filed on April 6, 2009. Based on information currently available to Vusura, the earliest priority date for the '303 Patent is April 6, 2009.

F. P.R. 3-1(f): Right to Rely on Plaintiffs' Own Instrumentality

Vusura does not contend that it practices the asserted claims of the asserted patents.

II. Vusura's P.R. 3-2 Production

A. P.R. 3-2(a): Disclosure Prior to Application Date

Vusura does not presently possess any relevant, non-privileged documents responsive to P.R. 3-2(a). Vusura will supplement this response should any relevant, non-privileged documents be identified in the future.

B. P.R. 3-2(b): Conception and Reduction to Practice

Vusura does not presently possess any relevant, non-privileged documents responsive to P.R. 3-2(b). Vusura will supplement this response should any relevant, non-privileged documents be identified in the future.

C. P.R. 3-2(c): File Histories for Patents-in-Suit

Vusura produces concurrently herewith a copy of the file history for each patent-in-suit at Vusura00000001-00000327, Vusura00000365-00000658, and Vusura00000688-00000803.

Dated: November 10, 2025

Respectfully submitted,

/s/ Masood Anjom

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record by electronic mail on November 10, 2025.

/s/ Masood Anjom
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