IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BECK BRANCH LLC, 　　Plaintiff, **v.** **VONAGE HOLDINGS CORP.,** 　　Defendant.	**CIVIL ACTION NO** **JURY TRIAL DEMANDED**

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

1.　　This is an action for patent infringement in which Beck Branch LLC makes the following allegations against Vonage Holdings Corp.

PARTIES

2.　　Plaintiff Beck Branch LLC ("Plaintiff") is a Texas limited liability company with its principal place of business at 101 E. Park Blvd, Suite 600, Plano, TX 75074.

3.　　On information and belief, Vonage Holdings Corp. ("Defendant" or "Vonage") is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Holmdel, NJ.

JURISDICTION AND VENUE

4.　　This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5.　　Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). Vonage is a Delaware corporation, and, thus, resides in Delaware for purposes of venue.

6.　　On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other

persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Delaware and in this Judicial District.
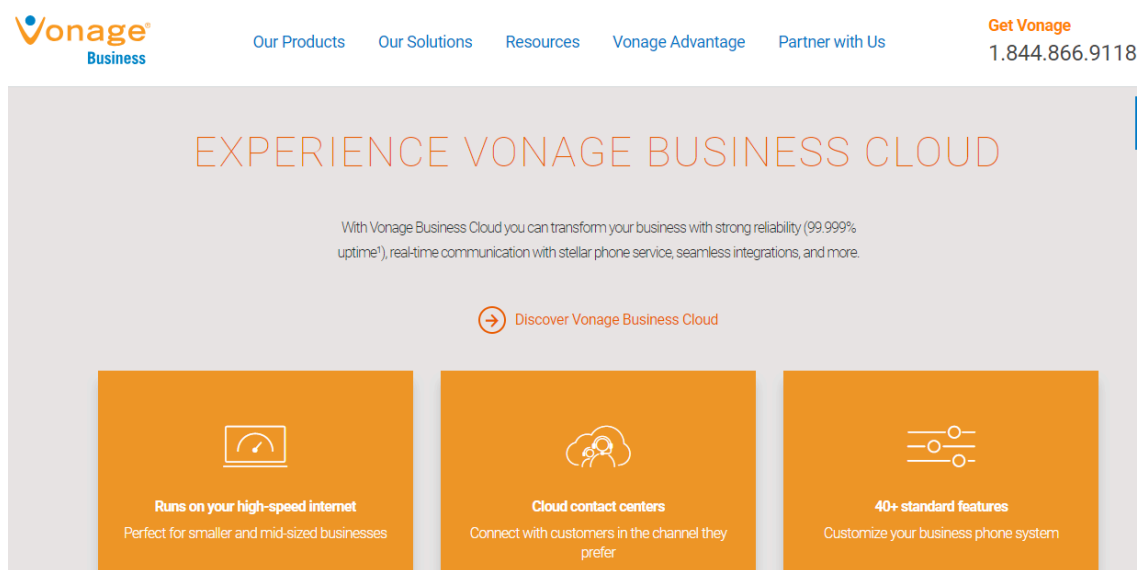
COUNT I

INFRINGEMENT OF U.S. PATENT NO. 6,873,620

7.   Plaintiff is the owner of United States Patent No. 6,873,620 ("the '620 patent") entitled "Communication Server Including Virtual Gateway to Perform Protocol Conversion and Communication System Incorporating the Same." The '620 Patent issued on March 29, 2005. A true and correct copy of the '620 Patent is attached as Exhibit A.
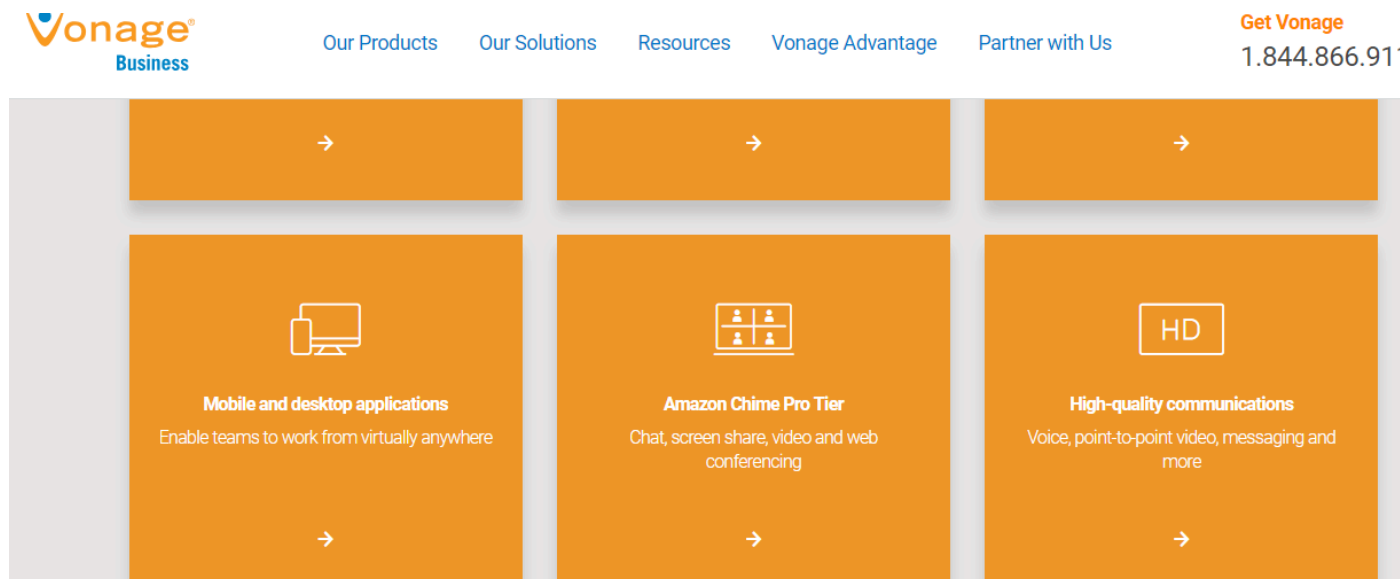
8.   Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides products and/or services that infringe the '620 patent. The '620 patent provides, among other things, " A communication server acting as a gateway for the transmission of messages between two virtual devices communicating with networks implementing different protocols, said communication server comprising: a knowledge base comprising a registry identifying each physical device registered to deliver messages for transmission between said virtual devices and through said gateway, a logical table identifying each registered connection available between physical devices and protocol conversion information required for each registered connection to convert messages of one protocol to a different protocol and a dynamic database identifying the current status of each actual connection between physical devices; and a virtual gateway accessing said knowledge base for protocol conversion information upon receipt of a message to be transmitted between said virtual devices and converting the protocol of said message to a protocol compatible with the network to which said message is being sent wherein said virtual gateway updates the protocol conversion information and the current status information in said knowledge base based on message traffic therethrough."

9.   Defendant directly and/or through intermediaries, made, has made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or services that infringed one or more claims of the '620 patent, including at least Claim 23, in this district and elsewhere in the United States. By making, using, importing, offering for sale, and/or selling such products and services, and all like products and services, Defendant has injured Plaintiff and is thus liable for infringement of the '620 patent pursuant to 35 U.S.C. § 271.

10.   Based on present information and belief, Vonage makes, uses, sells and/or offers for sale a communication server acting as a gateway for the transmission of messages between two virtual devices communicating with networks implementing different protocols. For example, Vonage provides Vonage Business unified communications service based on cloud Public Branch Exchange (PBX) for IP based communication, including but not limited to Session Initiation Protocol (SIP) based communication. When an SIP Trunking based call is placed to a Public Switched Telephone Network (PSTN) using Vonage Business software (which when installed on a computer, smartphone or other computing device comprise one or more "virtual devices"), the call is routed via the Vonage Cloud PBX system and PSTN Gateway included in the Vonage cloud server ("communication server"). The messages between Vonage Business software and the PSTN are transmitted via the cloud PBX ("Gateway").

Source: https://www.vonage.com/business/

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Mobile and desktop applications
Enable teams to work from virtually anywhere

Amazon Chime Pro Tier
Chat, screen share, video and web conferencing

HD

High-quality communications
Voice, point-to-point video, messaging and more

Source: https://www.vonage.com/business/

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HOME / WHAT WE DO / QUALITY OF SERVICE / SIP TRUNKING   Share

SIP Trunking

Your legacy phone system. Our cloud. Connected.

Session initiation protocol (SIP) trunking is cost-effective technology that connects legacy phones and IP PBXs to the cloud without removing or replacing them. With SIP trunking, Vonage makes it easy to update legacy phone systems and get cloud-hosted voice, video, data, text and other unified communications using the scalability of the internet or the power of our network.

What is SIP trunking?

Session initiation protocol (SIP) is the technology and the standard that empowers Voice over Internet Protocol (VoIP) within modern businesses. SIP trunking is the process by which this technology is applied to VoIP systems: SIP trunks replace traditional telephony trunks to bring enhanced communications to both IP networks and legacy systems.

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

[4]

SIP trunking enables cloud communications with high-speed internet

With SIP trunk over a high-speed internet, you can access Vonage cloud capabilities on your traditional PBX. You can even keep your phones. As a top SIP trunk provider, Vonage Business offers private SIP interoperability with Cisco® Call Manager, Avaya®, Asterisk®, Zultys®, and more.

More scalability, call trafficking, and disaster recovery

Many primary rate interface (PRI) systems require the purchase of 23 channels at a time. SIP trunks can be purchased individually so scaling up or down is simple. As a top SIP trunk provider, we also design solutions to handle high call volume and automatic call rerouting, vital to your service if there's problem on a circuit.

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

Vonage® Cloud PBX

Interested in a Vonage® business phone system?

GET STARTED

See Plans and Pricing

Say goodbye to closets full of wires and equipment.

VONAGE CLOUD PBX OVERVIEW

Upgrade your business phone system with a cloud PBX system from Vonage, priced efficiently to keep business expenses down. If you're switching from a traditional phone service, you're probably familiar with the on-premise PBX—the closetful of wires at your business.

The Vonage service is hosted in the cloud, so we manage the cloud PBX (aka, virtual PBX or IP PBX) off site for you. So there's never a need to install PBX equipment at your location, or schedule technician visits for upgrades or maintenance. As a result, you eliminate PBX installation and equipment costs, and the need to pay for service appointments at your office. We manage the system for you and administer all upgrades virtually.

Source: https://www.vonage.com/business/what-we-do/products/essentials/cloud-pbx/

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HOW CLOUD PBX WORKS

Cloud-hosted VoIP phone systems like Vonage have removed the hardware and technology limitations of traditional phone service. With cloud hosting, the feature-enabling PBX is provided by software running on a cloud-based architecture, instead of fixed hardware in a company's server closet. As a result, we're able to constantly update our software to bring robust features and enhancements to our entire customer base—without needing to upgrade hardware or software at each customer location. You simply need high-speed internet to access our service.

WHY YOU'LL LIKE CLOUD PBX

- No closet full of equipment. We host everything for you off-site.

- High-quality, reliable voice and data over the internet

- Efficient pricing with no on-site PBX equipment and installation

- Easy setup and access anywhere you have a high-speed internet connection

- System management and upgrades are handled virtually, with additional tech and customer support available 24/7.

- Access to over 40 business critical features like Virtual Receptionist, Call Recording, Call Flip, Call Forwarding, Mobile Apps, and more

- Seamlessly Integrates with the business applications and CRMs you use daily—to increase productivity.

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Customizable: Only pay for the call paths you need instead of being forced to install (and pay for) an entire PRI.

QoS on a private managed circuit

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Key Benefits

- Nationwide coverage for quality, disaster recovery and business continuity, diversity, etc.
- Redundant ring architecture
- National IP routing fabric
- Multiple access options-ethernet, Dsi, T1, DS3, OCN
- Multi-site MPLS VPN
- End-to-end quality of service (QoS)
- 2 domestic 24x7 NOCs with proactive monitoring and support

Nationwide MPLS Network

Data Centers ●
PSTN Gateway ■
Internet/IP Hub ●
POP ●
Super POP ●

[6]

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

11.   Based on present information and belief, Vonage makes, uses, sells and/or offers for sale a knowledge base comprising a registry identifying each physical device registered to deliver messages for transmission between said virtual devices and through said gateway. Upon information and belief, Vonage and/or its customers utilize Vonage Server SIP trunking functionality which comprises a knowledge base registry to identify the registered physical devices. Further, the server uses Vonage Cloud PBX to transmit messages and/or voice calls from Vonage Business software to the PSTN through PSTN Gateway.

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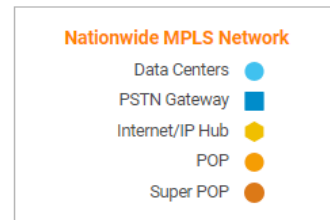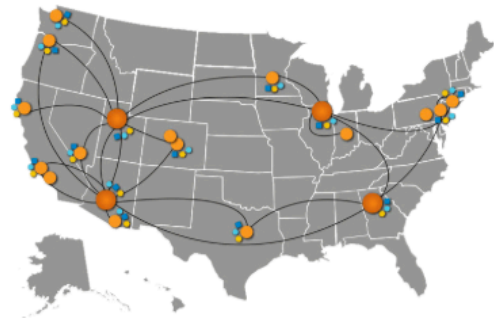
Source: https://www.vonage.com/business/what-we-do/products/essentials/cloud-pbx/

[8]

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

Further, Vonage Server also maintains a knowledge base comprising a registry identifying the phones and devices within the customers' network.

12.   Based on information and belief, Vonage makes, uses, sells and/or offers for sale a logical table identifying each registered connection available between physical devices and protocol conversion information required for each registered connection to convert messages of one protocol to a different protocol. Upon information and belief, Vonage and/or its customers utilize Vonage Server SIP trunking functionality which comprises a logical table to identify the type of connection.   Further, the Vonage cloud server selects PSTN Gateway to convert messages from Session Initiation Protocol (SIP) to PSTN.

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HOW CLOUD PBX WORKS

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WHY YOU'LL LIKE CLOUD PBX

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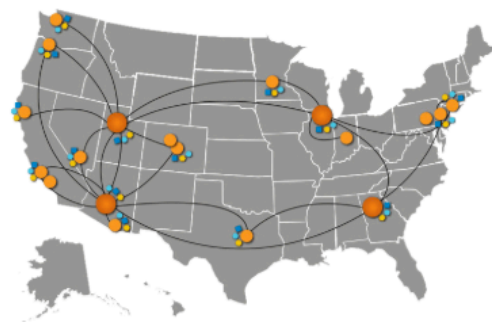
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✓ **Customizable:** Only pay for the call paths you need instead of being forced to install (and pay for) an entire PRI.

QoS on a private managed circuit

The Vonage Enterprise platform is supported by one of the largest private MPLS networks in the country. SIP trunks allow you to connect your legacy phone system to our MPLS network to provide elevated quality of service and allow cloud capabilities on your traditional PBX system. You'll get four-digit dialing between legacy PBX and the Vonage network users, impeccable call quality, and so much more.

Key Benefits

- Nationwide coverage for quality, disaster recovery and business continuity, diversity, etc.
- Redundant ring architecture
- National IP routing fabric
- Multiple access options-ethernet, Dsi, T1, DS3, OCN
- Multi-site MPLS VPN
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- 2 domestic 24x7 NOCs with proactive monitoring and support

Nationwide MPLS Network

Data Centers 🔵
PSTN Gateway 🟦
Internet/IP Hub 🟡
POP 🟠
Super POP 🟤

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

13.   Based on present information and belief, Vonage makes, uses, sells and/or offers for sale a dynamic database identifying the current status of each actual connection between physical devices. Upon information and belief, Vonage and/or its customers utilize Vonage Server SIP trunking functionality which comprises a cloud PBX further comprising a dynamic database to identify the current status of connection between the physical devices (including IP phones, installation computers and the physical PSTN terminals).

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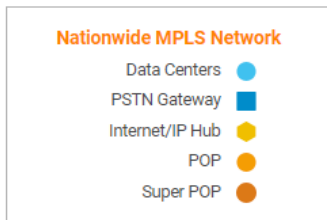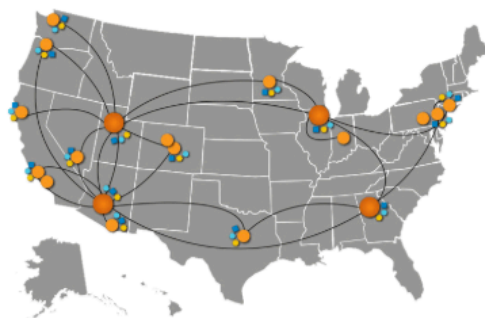
Source: https://www.vonage.com/business/what-we-do/products/essentials/cloud-pbx/

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

14.   Based on present information and belief, Vonage makes, uses, sells and/or offers for sale a virtual gateway accessing said knowledge base for protocol conversion information upon receipt of a message to be transmitted between said virtual devices. For example, Vonage and/or its customers utilize Vonage Server SIP trunking functionality comprising a SIP Proxy ("Virtual gateway") which uses the PSTN Gateway for protocol conversion upon receiving the message to be transmitted from Vonage's Vonage Business software to the PSTN.

[11]

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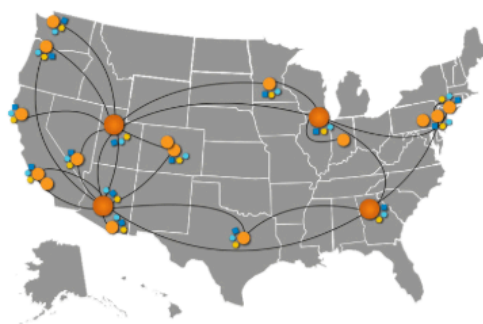
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Customizable. Only pay for the call paths you need instead of being forced to install (and pay for) an entire PRI.

QoS on a private managed circuit

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Key Benefits

- Nationwide coverage for quality, disaster recovery and business continuity, diversity, etc.
- Redundant ring architecture
- National IP routing fabric
- Multiple access options-ethernet, Dsi, T1, DS3, OCN
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- 2 domestic 24x7 NOCs with proactive monitoring and support

Nationwide MPLS Network

Data Centers ●
PSTN Gateway ■
Internet/IP Hub ●
POP ●
Super POP ●

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

15.   Based on present information and belief, Vonage makes, uses, sells and/or offers for sale a virtual gateway converting the protocol of said message to a protocol compatible with the network to which said message is being sent. For example, Vonage and/or its customers utilize Vonage Server SIP trunking functionality comprising a PSTN Gateway which converts the protocol of the messages sent from Vonage Business software to the protocol used within the PSTN.

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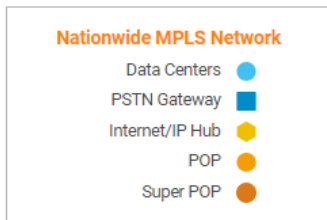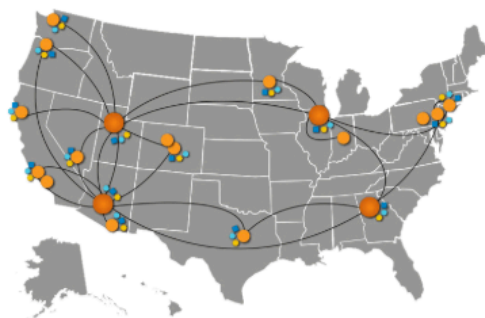
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16.   Based on present information and belief, Vonage makes, uses, sells and/or offers for sale a virtual gateway wherein said virtual gateway updates the protocol conversion information and the current status information in said knowledge base based on message traffic there through. For example, Vonage and/or its customers utilize Vonage Server SIP trunking functionality comprising Proxy server accesses and updates the information stored in the registry based on the communicating virtual devices.

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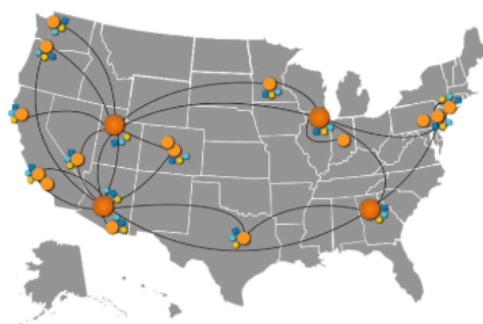
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Super POP ●

Source: https://www.vonage.com/business/what-we-do/unified-communications/sip-trunking/

17.   In the alternative, because the manner of use by Defendant differs in no substantial way from language of the claims, if Defendant is not found to literally infringe, Defendant infringes under the doctrine of equivalents.

18.   Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

19.   In addition to what is required for pleadings in patent cases, and to the extent any marking was required by 35 U.S.C. § 287, Plaintiff and all predecessors in interest to the '620 Patent complied with all marking requirements under 35 U.S.C. § 287.

20.   Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of the Defendant's wrongful acts in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1.   A judgment in favor of Plaintiff that Defendant has infringed the '620 Patent;

2.   A judgment and order requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '620 Patent as provided under 35 U.S.C. § 284;

3.   An award to Plaintiff for enhanced damages resulting from the knowing, deliberate, and willful nature of Defendant's prohibited conduct with notice being made at least as early as the date of the filing of this Complaint, as provided under 35 U.S.C. § 284;

4.   A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees; and

5.   Any and all other relief to which Plaintiff may show itself to be entitled.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully Submitted,

[16]

BECK BRANCH LLC

Dated: July 1, 2018

By: __/s/Stamatios Stamoulis_____
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Richard C. Weinblatt #5080
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**ATTORNEYS FOR PLAINTIFF
BECK BRANCH LLC**