

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**BECK BRANCH LLC,**

Plaintiff,

v.

**VOXBONE US LLC,**

Defendant.

**CIVIL ACTION NO 1:18-cv-1065**

**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 Voxbone US LLC.

**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, Voxbone US LLC (“Defendant” or “Voxbone”) is a limited liability company organized and existing under the laws of the State of Delaware, with its principal place of business in Simi Valley, CA.

**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). On information and belief, acts of infringement have been committed in this District. Additionally, Voxbone has a regular and established place of business in this District, including, without limitation, 600 Congress Avenue, Austin, TX 78701.

6. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas 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 Texas 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, Voxbone 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, Voxbone provides SIP Trunking for global business communications platform based on cloud Internet Protocol (IP) Private Branch Exchange (PBX) for IP based communication. When a SIP Trunking based call is placed to a Public Switched Telephone Network (PSTN) using SIP Trunks (which when installed on a computer, smartphone or other computing device comprise one or more virtual devices), the calls are routed via the Voxbone Global Private IP Backbone and Voxbone Gateway (“communication server”) using WebRTC (Web Real-Time Communication). Further, the messages between Voxbone’s SIP Trunks and the PSTN are transmitted via the Voxbone Gateway.

**NEW** [How to cut your carrier cord in 17 countries](#)

# Strangely simple communications

Cut your carrier cord with hyper local voice and messaging services available on demand in 9000+ area codes across 60+ countries. This is global business comms redefined, free from the tyranny of PSTN lines.

[GET IN TOUCH](#) [OR TRY FOR FREE!](#)

Source: <https://www.voxbone.com/>

## SIP trunks, nothing to do with elephants

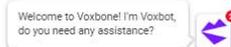


Get your business talking to everyone, everywhere. Our two-way SIP trunks put you in touch with the people that matter, from over 9,000 area codes across 60+ countries. That's the power of VoIP.

### Unlimited concurrent call capacity when you need it

We provide inbound access to on-demand voice services delivered via Session Initiation Protocol (SIP). Each of our DID numbers can be assigned to any SIP URI and carry any number of simultaneous inbound and outbound calls with the purchase of additional trunks. We call this your concurrent call capacity.

Our web portal and APIs provide real-time access to phone numbers and call capacity for over 9,000 area codes across 60+ countries. Check out our APIs.



Source: <https://www.voxbone.com/network/sip-trunks>

# SERVICES

## VoxDID

VoxDID allows customers to extend the international reach of their voice network rapidly, at limited cost. Incoming calls to our numbers are locally converted from PSTN to VoIP and transported to anywhere in the world over Voxbone's private VoIP backbone.

- Geographic mobile and national phone numbers
- 60+ countries and 9,000+ cities
- Global call capacity sharing
- Local number portability
- Flat monthly fee (no per-minute fees)

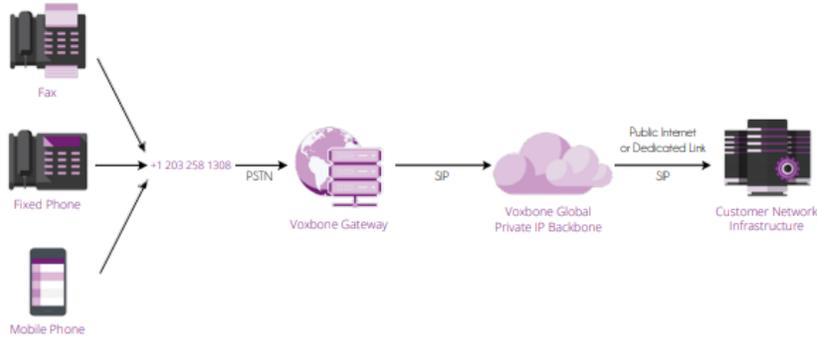
## Vox800

Voxbone provides local toll-free phone numbers in various countries for direct inward dialing (DID). Incoming calls to our toll-free numbers are locally converted from PSTN to VoIP and transported to anywhere in the world over Voxbone's private VoIP backbone.

- Local toll-free phone numbers
- 45+ countries covered
- Global call capacity sharing
- Local number portability
- No restrictions on concurrent calls

Source: [https://www.voxbone.com/files/VOXBONE\\_BROCHURE.pdf](https://www.voxbone.com/files/VOXBONE_BROCHURE.pdf), page 3

## CALL FLOW



## ENABLERS

| VoxTRUNK  | VoxCONNECT   | VoxCOMMAND  | VoxAPI   |
|---|--|---|--|
| <ul style="list-style-type: none"> <li>• Call capacity for VoxDID and Vox800</li> <li>• Capacity sharing across all countries</li> <li>• Sub-allocation to groups of numbers</li> <li>• Rapid capacity provisioning</li> <li>• Flat monthly fee (no per-minute fees)</li> </ul> | <ul style="list-style-type: none"> <li>• Direct interconnection options to Voxbone's backbone</li> <li>• Failover via public Internet (with encryption)</li> <li>• Private, fully-redundant global IP backbone</li> <li>• SuperPoPs in 5 locations on 3 continents</li> <li>• Interconnection with 10+ global Tier1 IP carriers</li> </ul> | <ul style="list-style-type: none"> <li>• Powerful, secure and user-friendly web portal</li> <li>• On-the-fly ordering and provisioning</li> <li>• Instant configuration of technical parameters</li> <li>• Real-time reporting (CDRs and statistics)</li> <li>• Failover and load-balancing settings</li> </ul> | <ul style="list-style-type: none"> <li>• Capability for white-label resale</li> <li>• XML/SOAP, XML/REST or JSON/REST over HTTPS</li> <li>• Automated ordering and configuration</li> <li>• Access control and authentication based security</li> <li>• Voxbone developer support</li> </ul> |

Source: [https://www.voxbone.com/files/VOXBONE\\_BROCHURE.pdf](https://www.voxbone.com/files/VOXBONE_BROCHURE.pdf), page 4

# OPTIONAL FEATURES

## WebRTC (beta)

With WebRTC, Voxbone enables its customers to quickly and easily deploy high-quality and secure WebRTC services without complex software development or network investment.

Voxbone routes WebRTC calls over its private global backbone instead of the public Internet, adding high levels of quality of service and security.

Calls are delivered over a regular SIP trunk, allowing Voxbone customers to start using WebRTC without the need for additional investment in network infrastructure.

- Easy integration of WebRTC
- Carrier-grade quality
- WebRTC JavaScript library
- DDoS protection

## VoxOUT

VoxOUT offers instant access to local emergency services from multiple countries over one interconnection. The service enables outgoing calls to emergency services for VoxDID phone numbers. At the core of this service, Voxbone maintains routing tables that map local addresses to local emergency service numbers.

- Access to all local emergency numbers
- Compliance with regulatory requirements
- Activation on a per-number basis
- Bulk provisioning available
- Flat rate billing
- Interconnection shared with inbound services
- Availability in multiple countries

## VoxFAX

- Inbound fax delivery via HTTP and SMTP
- 50+ countries covered
- PDF, TIFF and custom formats
- White-labeled API integration
- Flat monthly fee (no per-minute fees)

## VoxSMS

- Inbound and outbound SMS on VoxDID Mobile
- Two-way SMS service to all mobile networks
- High quality international termination at competitive rates
- SMPP interconnection
- VoxSMS API

Source: [https://www.voxbone.com/files/VOXBONE\\_BROCHURE.pdf](https://www.voxbone.com/files/VOXBONE_BROCHURE.pdf), page 3

## What are SIP trunks? Nothing to do with elephants



First, let's start with another acronym, VoIP. This stands for Voice over Internet Protocol and is the name for a variety of technologies used to deliver voice calls over data networks, such as the public internet or VPNs, instead of the traditional circuit-switched networks used for telecommunications. As businesses scale up in size, most will use VoIP systems to route calls internally across their data network using a private-branch exchange. This lets them reduce overheads by removing the need to manage separate data and voice networks.

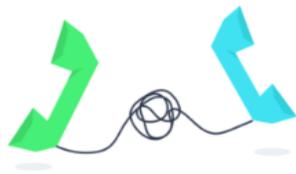
SIP (Session Initiation Protocol) is a signalling protocol used for the real-time delivery of voice and media. With the right infrastructure and interconnections in place, SIP calls can be transmitted between data networks and the public-switched telephone network (PSTN), the global mass of traditional telephone networks operated by national, regional and mobile carriers. So in very simple terms, SIP can be used to enable your on-premise phone systems to make and receive calls via data connections. A virtual phone number, called a DID, can be assigned to your SIP connection so that customers have a phone number to ring when they wish to speak to you.

Source: <https://www.voxbone.com/blog/5-business-benefits-sip-trunks>

## Centralized comms

If you have multiple business locations, SIP trunking eliminates the need for individual telephone lines at each location, consolidating all branches or offices and creating a single, centralized platform. This results in reduced hardware needs and impressive long-term cost savings. Remember though, that to fully replicate the functionality of the PSTN for business purposes, you'll need a SIP provider that offers:

- ◆ Inbound voice
- ◆ Outbound voice (domestic and international)
- ◆ Number portability
- ◆ Access to local emergency services numbers



## Consolidation of providers

With traditional telephone carriers, you only ever receive coverage in one country, (a handful, if you are lucky) meaning that you need to enter into contracts with dozens of service providers for a global communications footprint.

Source: <https://www.voxbone.com/blog/5-business-benefits-sip-trunks>

SIP brings greater depth to the traditional phone call as it's able to set up set up video and audio multicast meetings, or instant messaging conferences.

Voxbone provides local phone numbers (DID) from 50+ countries that can be mapped to any SIP endpoint and have the calls routed through our IP Core backbone.

With our network and this SDK, you will be able to connect the browser to legacy telephone networks like a PBX or even hosted PBXs like Asterisk. You will be able to create applications such as browser-based click-to-call buttons or conferencing bridge.

Source: <https://developers.voxbone.com/webrtc/overview-webrtc/overview/>

The screenshot shows the 'Overview' page for the Voxbone WebRTC API. The page layout includes a purple header with navigation options, a sidebar with a 'WebRTC API' menu, and a main content area. The main content area contains the following text:

**Overview**

Voxbone's WebRTC WebSDK allows you to make and receive calls using Voxbone's DIDs directly from webRTC-enabled web browser. Using this SDK and documentations, you will be able to create applications like Click to Call, Conference bridges and web-based call centers. Read the documentation to get an idea of what can be done!

The Voxbone WebRTC SDK uses a slightly modified JS SIP library. This means that you can also refer to the [JSSIP documentation](#) for additional feature implementation.

The diagram below illustrates the network architecture. It shows a client (Mobile Phone) connected to the Internet. The Internet connects to the Voxbone Global Private IP Backbone. This backbone is connected to various endpoints, including PSTN (Public Switched Telephone Network) and Customer Network Infrastructure. A red box highlights the 'Voxbone WebRTC Implementation' section, which includes 'Authentication + SIP RCP + selection' and 'WebRTC call to +1 202 258 1308'. A 'NEW' label is placed next to this section.

Source: <https://developers.voxbone.com/webrtc/overview-webrtc/overview/>

11. Based on present information and belief, Voxbone 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, Voxbone and/or its customers utilize Voxbone SIP Trunking functionality which comprises a knowledge base registry to identify the registered physical devices. Further, Voxbone uses Voxbone Global Private IP Backbone to transmit messages from Voxbone SIP Trunk to the PSTN through Voxbone Gateway.

## What are SIP trunks? Nothing to do with elephants



First, let's start with another acronym, VoIP. This stands for Voice over Internet Protocol and is the name for a variety of technologies used to deliver voice calls over data networks, such as the public internet or VPNs, instead of the traditional circuit-switched networks used for telecommunications. As businesses scale up in size, most will use VoIP systems to route calls internally across their data network using a private-branch exchange. This lets them reduce overheads by removing the need to manage separate data and voice networks.

SIP (Session Initiation Protocol) is a signalling protocol used for the real-time delivery of voice and media. With the right infrastructure and interconnections in place, SIP calls can be transmitted between data networks and the public-switched telephone network (PSTN), the global mass of traditional telephone networks operated by national, regional and mobile carriers. So in very simple terms, SIP can be used to enable your on-premise phone systems to make and receive calls via data connections. A virtual phone number, called a DID, can be assigned to your SIP connection so that customers have a phone number to ring when they wish to speak to you.

Source: <https://www.voxbone.com/blog/5-business-benefits-sip-trunks>

The screenshot shows the Voxbone developer portal. The top navigation bar includes the Voxbone logo and links for API, Sandbox, Resources, Community, and FAQ. The main content area is titled "Overview" and describes the WebRTC WebSDK. It states that the SDK allows users to make and receive calls using Voxbone's DIDs directly from a web browser. The page also mentions that the SDK uses a modified JS SIP library and refers to the JSSIP documentation for additional features. A diagram at the bottom illustrates the network architecture, showing connections between various phone types (Fax, Fixed Phone, Mobile Phone), PSTN, SIP, and the Internet, with a focus on the WebRTC infrastructure and authentication process.

Source: <https://developers.voxbone.com/webrtc/overview-webrtc/overview/>

# Cookie Policy

## How do we use cookies?

At Voxbone we respect and value your online choices. We understand your concern about the information you share with us while using our site [www.voxbone.com](http://www.voxbone.com) and we commit to respect your preferences in accordance with this Cookie Policy, which describes our practices regarding the use of cookies and helps you to be in control of your information at all times. This Policy applies to any Voxbone product or service that links to this Policy or incorporates it by reference.

Voxbone uses cookies to offer the best browsing experience possible to the user. If you continue visiting our site, you are agreeing to the use of cookies and similar technologies for the purposes described in this Policy.

We also use cookies to collect certain information when you visit our site [www.voxbone.com](http://www.voxbone.com), including the pages you have visited, the date and time, the viewed content and other aggregate information, which will help us to enhance and personalize your experience of our site, understand our performance, and provide you with more relevant adverts or marketing communications.

## What are cookies?

Cookies are text files which contain a small amount of information, often appearing as a block of numbers and letters, which identify your device. Here is an example of what a cookie served from our SITE may look like:

```
%7CAQ5CY25K3BCSHPMEKVL2RE%3A28158185%3A1%7C20LXLEC...
```

Cookies are downloaded to and stored in your device (computer/smartphone/tablet) whenever you enter certain web pages. They enable the website to remember browsing preferences and improve browsing by making the interaction between the user and the website more efficient.

The information collected by cookies is anonymous and does not contain any sensitive information (such as name, address or banking details), as cookies do not collect data which may identify the user.

Source: <https://www.voxbone.com/cookie-policy>

# SERVICES

## VoxDID

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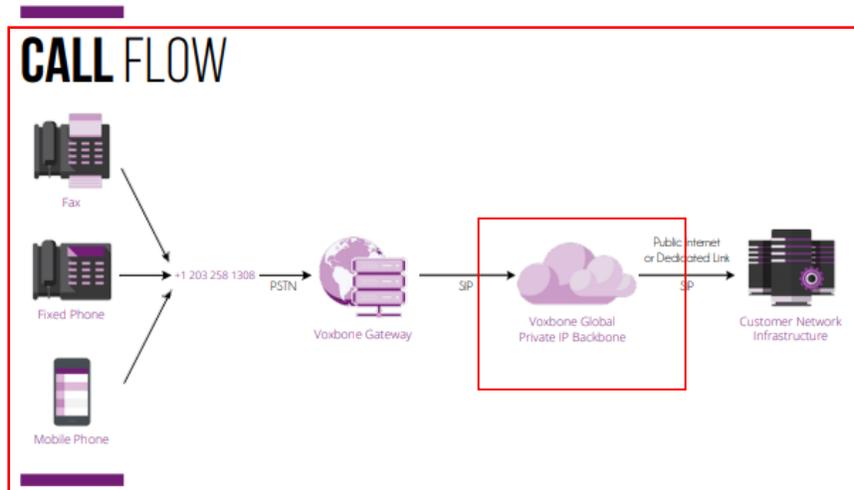
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Source: [https://www.voxbone.com/files/VOXBONE\\_BROCHURE.pdf](https://www.voxbone.com/files/VOXBONE_BROCHURE.pdf), page 4

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

12. Based on information and belief, Voxbone 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, Voxbone and/or its customers utilize Voxbone SIP Trunking functionality which comprises a logical table to identify the type of connection and selects Voxbone Gateway to convert messages from Session Initiation Protocol (SIP) to PSTN.

13. Based on present information and belief, Voxbone 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, Voxbone and/or its customers utilize Voxbone SIP Trunking functionality which comprises a Voxbone Global Private IP Backbone. Voxbone Global Private IP Backbone uses dynamic database to identify the current status of connection

between the physical devices (including IP phones, installation computers and the physical PSTN terminals).

14. Based on present information and belief, Voxbone 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, Voxbone and/or its customers utilize Voxbone SIP Trunking functionality comprising a Voxbone Global Private IP Backbone (“virtual gateway”) which uses the knowledge base registry for protocol conversion upon receiving the message to be transmitted from Voxbone SIP Trunks to the PSTN.

15. Based on present information and belief, Voxbone 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, Voxbone and/or its customers utilize Voxbone SIP Trunking functionality comprising a Voxbone Gateway which converts the protocol of the messages sent from Voxbone Global Private IP Backbone to the protocol used within the PSTN.

16. Based on present information and belief, Voxbone 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, Voxbone and/or its customers utilize Voxbone SIP Trunking functionality comprising Voxbone Global Private IP Backbone accesses and updates the information stored in the registry based on the communicating virtual devices.

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,

**BECK BRANCH LLC**

*/s/ Papool S. Chaudhari*

Dated: December 10, 2018

By: \_\_\_\_\_

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