

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

VISIBLE CONNECTIONS, LLC,

Plaintiff,

v.

ZOOM VIDEO
COMMUNICATIONS, INC.,

Defendant.

CIVIL ACTION NO.

JURY TRIAL REQUESTED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Visible Connections, LLC (“VisiCon” or “Plaintiff”) files this Complaint for Patent Infringement against Defendant Zoom Communications, Inc. (“Zoom” or “Defendant”), and states as follows:

THE PARTIES

1. Plaintiff is a limited liability company organized and existing under the laws of the State of Georgia, having its principal office at 4725 Peachtree Corners Circle, Day Building, Suite 230, Peachtree Corners, Georgia 30092.

2. Defendant is a corporation organized and existing under the laws of the State of Delaware and is registered and authorized to do business in the State of

Georgia. Defendant may be served via its registered agent, Incorporating Services, Ltd. 900 Old Roswell LKS Pkwy., Suite 310, Roswell, Georgia 30076.

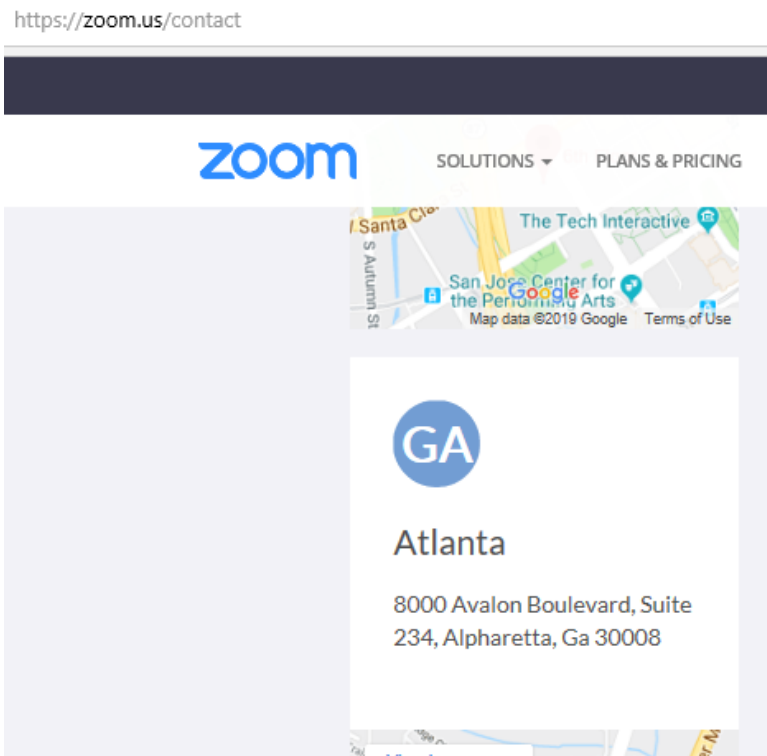
JURISDICTION AND VENUE

3. This Court has exclusive subject matter jurisdiction over this case pursuant to 28 U.S.C. §§ 1331 and 1338(a) on the grounds that this action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including, without limitation, 35 U.S.C. §§ 271, 281, 284, and 285.

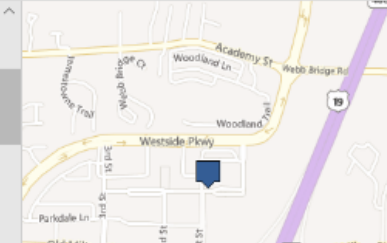
4. This Court has personal jurisdiction over Defendant on the grounds that Zoom has minimum contacts with the State of Georgia and has purposefully availed itself of the privileges of conducting business in the State of Georgia including through the sale and offer for sale of products accused of infringement in this action throughout the State of Georgia and this judicial district. Further, Zoom maintains a regular and established place of business in this district, namely 8000 Avalon Blvd. Suite 100, Alpharetta, Georgia 30008.

5. Venue is proper in this Court pursuant to 28 U.S.C. § 1400(b) on the grounds that Defendant has committed acts of infringement in this judicial district and has a regular and established place of business in this judicial district, namely 8000 Avalon Blvd. Suite 100, Alpharetta, Georgia 30008

6. Zoom lists an Alpharetta office address on its website which can be found at <https://zoom.us/contact> and on its LinkedIn website which can be found at <https://www.linkedin.com/company/zoom-video-communications/about/> :



Website	https://www.zoom.com
Industry	Information Technology and Services
Company size	1,001-5,000 employees
Headquarters	San Jose, CA
Type	Public Company
Founded	2011
Specialties	Mobile Collaboration, Audio Conferencing, Video Conferencing, Online Meetings, Web Conferencing, and Cloud Meetings

Locations	
Level 1, 9 Castlereagh St, Sydney, NSW 2000, AU	
Get directions	
Headquarters 8000 Avalon Blvd , Suite 100, space 216, Alpharetta, Georgia 30008, US	
Get directions	

FACTUAL BACKGROUND

7. VisiCon is the owner by assignment of all right, title and interest in and to United States Patent Number 6,665,392 (“the ’392 Patent”), titled “Associating Data Connections With Conference Call Telephone” including the right to sue for all past, present, and future infringement.

8. A true and correct copy of the ’392 Patent is attached hereto as Exhibit A.

9. The ’392 Patent issued from application no. 09/610,566 (“the ’566 Application”) filed on July 3, 2000.

10. The Patent Office granted the '392 Patent on December 16, 2003, after a full and fair examination.

11. The '392 Patent is valid and enforceable.

12. VisiCon is the owner by assignment of all right, title and interest in and to United States Patent Number 7,284,203 (“the '203 Patent”), titled “Method and Apparatus for Application Sharing Interface” including the right to sue for all past, present, and future infringement.

13. A true and correct copy of the '203 Patent is attached hereto as Exhibit B.

14. The '203 Patent issued from application no. 09/362,014 filed on July 27, 1999 (“the '014 Application”).

15. The Patent Office granted the '203 Patent on October 16, 2007, after a full and fair examination.

16. The '203 Patent is valid and enforceable.

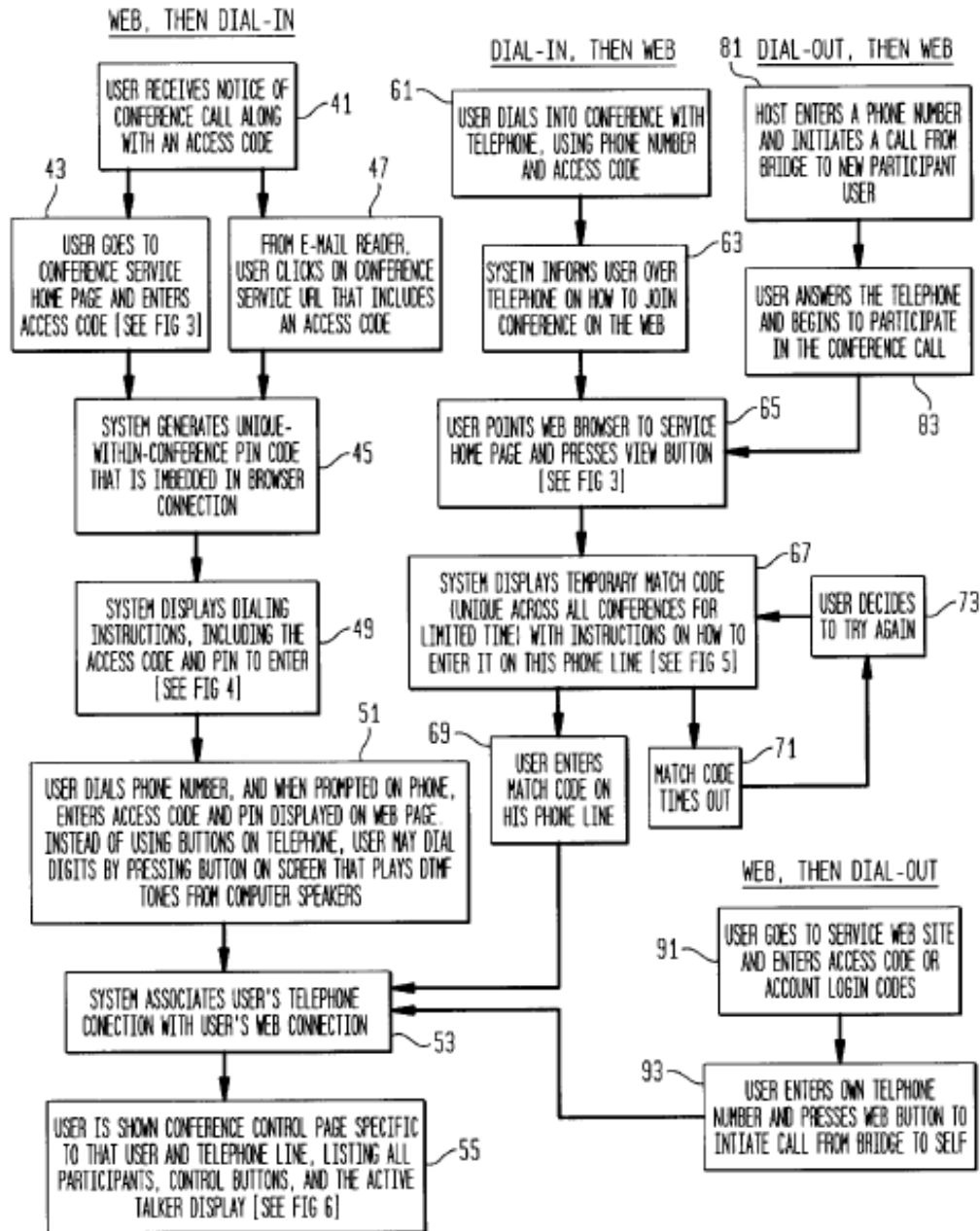
SUBJECT MATTER OF THE '392 PATENT

17. The '392 Patent describes a method for operationally associating a participant's telephone connection to a conference call system with a data connection via the internet.

18. The '392 Patent is directed to solving problems particular to conferencing programs and the claimed subject matter relates to telecommunications conferencing. '392 Patent, 1:19-22.

19. As described in the figure below the system associates the user's telephone connection with the user's web connection.

FIG. 3



20. The inventors of the '392 Patent recognized that "Conference call systems that integrate personal computers with telephones often need to establish an operational association between a user's computer screen and that user's telephone

line.” ’392 Patent 1:25-28. By improving communication conferencing systems to associate data and voice connections, conference organizers and participants eliminate barriers to connecting to a conferencing system in systems existing at the time. This enabled faster and more efficient conference set-up and avoids a cumbersome pre-registration process requiring conference line reservation or distribution of access PIN codes in advance of a conference call.

21. By associating voice and data communication lines on a conferencing system, the inventions claimed in the ’392 Patent enables a conference administrator to identify data recipients and providers and associate them with active voice call participants.

22. The ’392 Patent provides several advantages over the prior art: a) participants do not have to pre-register with the system to enjoy its benefits and capabilities; b) participants do not have to remember a personal identification number from one conference to the next (a unique temporary code is generated) and c) the conference host can broadcast the details about joining the call via email or other medium without the necessity of sending individualized invitations to participants each with a unique access code. ’392 Patent 2:1-8.

23. The ’392 Patent describes and claims a specific way to overcome connection and communication problems by 1) generating a unique temporary code

when a data connection is established between the participant and said conference call system; 2) displaying the code over the data connection to the participant on that participant's computer screen; and 3) instructing the participant to enter the code over his telephone connection to the conference call system. '392 Patent, 2:34-45.

24. For example, in a web-then-dial-in scenario, the operational association between the participant's telephone and data connections is accomplished by: 1) establishing a data connection between the participant's computer screen and the conference system; 2) receiving a conference access code from the participant for a specific conference call; 3) generating a PIN (personal identification number) code unique to the specific conference; 4) sending the PIN code over the participant's data connection to the participant's computer; 5) displaying dialing instructions on the participant's computer screen explaining to the participant how to enter the conference; 6) dialing into the conference call according to the displayed dialing instructions; 7) establishing an operational association between the participant's data and telephone connections; and 8) displaying a conference control web page specific to the participant and the participant's telephone connection. '392 Patent, 2:56-3:5.

25. A person of ordinary skill in the art at the time of the invention would recognize that the steps and methods claimed in the '392 Patent were unconventional

and describe associating conferencing lines of communication in a way that was not routine.

26. The '392 Patent recognized that “[i]n the past, systems have typically solved the operational association problem by pre-registering each participant with a unique ID (identification).” ’392 Patent 1:49-51.

27. A person of ordinary skill in the art at the time of the invention would understand that the conventional way of solving these problems at the time of the invention was to pre-register users and provide unique personal IDs in addition to the conference codes on their connection via the public switched telephone network and on their computer over the data network. A skilled artisan would recognize that convention presented redundancy and barriers to access that did not allow for dynamically establishing connections and associating the user’s connection over the public switched telephone network with their data connection on the conference call system.

28. The '392 Patent described the operation of the pre-registering technique described in the preceding paragraph: “[w]hen participants dial in to the conference bridge, they must not only enter their conference codes but must also enter their unique personal IDs, using the same personal ID when connecting to the system from a computer over the data network.” ’392 Patent, 1:51-55.

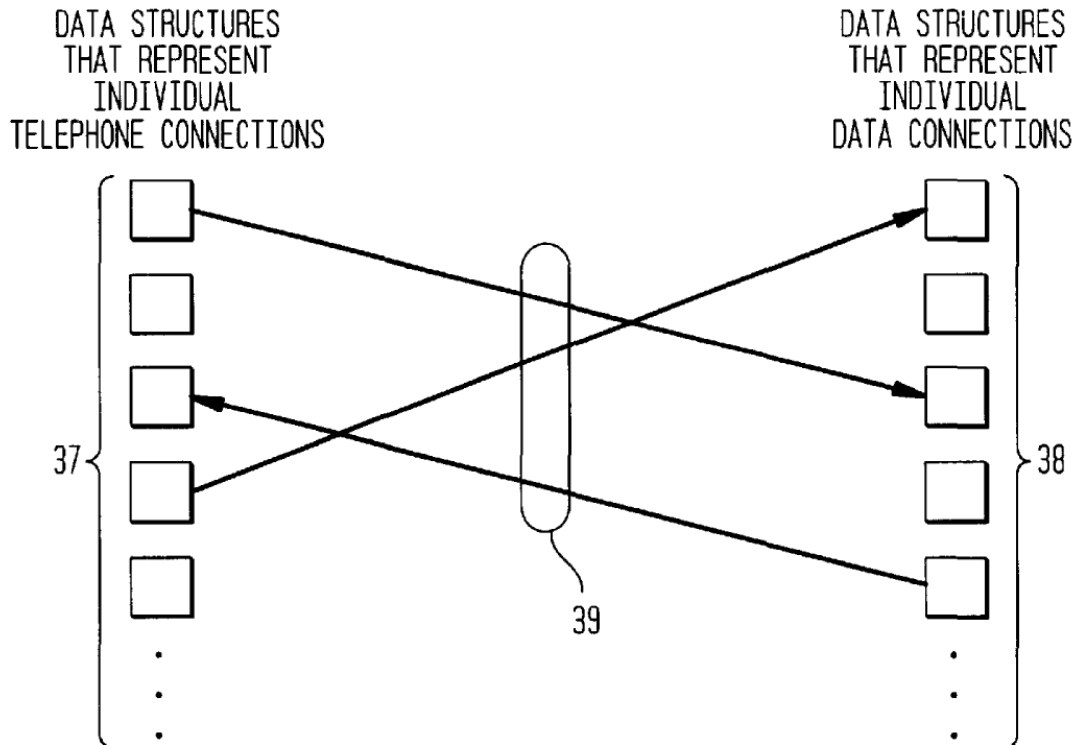
29. The '392 Patent noted certain problems with this approach: “[u]nregistered participants cannot be identified. Drawbacks to this approach are that participants must be pre-registered to enjoy the full benefits of the user interface and must also remember their personal identification numbers.” '392 Patent, 1:55-59.

30. The '392 Patent provides technical solutions to these and other deficiencies in the prior art: “This invention enables a conference call system to establish efficiently an operational association between a particular user’s computer on a public data network (e.g., a web browser on the Internet world wide web and that same user’s telephone on the public switched telephone network (PSTN).” '392 Patent at 1:62-67.

31. For example, the '392 Patent addresses deficiencies in the art by providing that: “[i]n accordance with the invention, a participant’s telephone connection to a conference call system is operationally associated with a data connection from that participant’s computer screen to a conference call system which establishes voice connections between itself and multiple conference call participants by: (1) generating a unique temporary code when a data connection is established between the participant and said conference call system; (2) displaying the code over the data connection to the participant on that participant’s computer

screen; and (3) instructing the participant to enter the code over his telephone connection to the conference call system.” ’392 Patent, 2:34-45.

FIG. 2



32. As shown above in Figure 2, an operational association, represented by each of a plurality of arrows **39**, between a specific telephone connection and data connection is established when the unique identifier for a specific data connection is stored in the data structure for a specific telephone connection, or when the unique identifier for a particular telephone connection is stored in the data structure of a specific data connection. In other words, the data structure representing a telephone connection can store a pointer that identifies a specific data connection, and the data

structure representing a data network connection can store a pointer that identifies a telephone connection. '392 Patent, 4:39-57.

33. In the '392 Patent security and authentication of a user is improved through operational association. The '392 Patent claims a method to authenticate a participant controlling a data connection with access to a telephone connection. '392 Patent, 1:33-35

34. Claim 1 of the '392 Patent states a method for operationally associating a participant's telephone connection to a conference call system with a data connection from said participant's computer screen to the conference call system:

1. A method of operationally associating a participant's telephone connection to a conference call system with a data connection from said participant's computer screen to said conference call system, said conference call system establishing voice connections between itself and multiple conference call participants, said method comprising the steps of:

generating a unique temporary code when a data connection is established between said participant and said conference call system;
displaying said code over said data connection to said participant on that participant's computer screen; and
instructing said participant to enter said code over his telephone connection to the conference call system.

35. Claim 5 of the '392 Patent depends from Claim 1 and specifies:

5. The method of claim 1 in which the operational association between said participant's telephone and data connections is accomplished by the steps of:

- establishing a data connection between said participant's computer screen and the conference system;
- receiving a conference access code from said participant for a specific conference call;
- generating a PIN (personal identification number) code unique to the specific conference;
- sending said PIN code over said participant's data connection to said participant's computer;
- displaying dialing instructions on said participant's computer screen explaining to said participant how to enter the conference;
- dialing into the conference call according to said displayed dialing instructions;
- establishing operational association between said first participant's data and telephone connections; and
- displaying a conference control web page specific to said participant and said participant's telephone connection.

36. A person skilled in the art at the time of the invention would understand that the claims recite steps and structural limitations operating in an unconventional manner to achieve an improved authentication and operational association of the telephone connection and the data connection in the conference call system.

37. These technological improvements provide greater flexibility for participant log-in and participation by establishing an operational association between a user's computer and a data connection and the same user's phone connection.

38. The novel use and arrangement of the specific combinations and steps recited in the '392 claims were not well-understood, routine, or conventional to a person skill in the relevant field at the time of the inventions.

39. In its Order denying a motion to dismiss based on the allegation that the '392 Patent was directed to unpatentable subject matter filed by Zoho Corporation in *Visible Connections, LLC v. Zoho Corporation*, (Case No. 1:18-cv-859-RP, W.D. Tex., Dkt. 36), the United States District Court for the Western District of Texas considered the question of whether claims 1 and 5 of the '392 Patent contain limitations that, considered together, form an ordered combination of steps that was not well-understood, routine, and conventional at the time of the invention and held that VisiCon, in its First Amended Complaint in that action, "has alleged in non-conclusory fashion that they do." *Id.* at 8.

SUBJECT MATTER OF THE '203 PATENT

40. The '203 Patent describes a method and apparatus for application sharing. The claimed subject matter of the '203 Patent relates to improvements to computer functionality and user interfaces for electronic devices used in conferencing systems. '203 Patent, 1:6-10.

41. The '203 Patent is directed to real-time application sharing via a conferencing interface program that maintains connectivity status and active participant information.

42. The inventors of the '203 Patent recognized that “[s]ome application programs allow a computer system user to contemporaneously share electronic media with users of other computer systems (“application sharing”)” and that “[t]hese programs conventionally comprise some level of conferencing capability.” '203 Patent, 1:26-31. But they noted that these had problems.

43. These prior conferencing systems lacked status information pertaining to participants, so administrators and other conference participants were unable view shared documents with known participants, unable to know who was viewing a shared document, and unable to assess audience size or participation. The '203 Patent addressed these shortcomings by using an interface program in cooperation with a call manager to maintain this information during a conference call. This enabled real-time shared viewing between at least one audience member and a host user having up-to-the-moment user information.

44. The inventors recognized and addressed operational problems with existing systems because “these conferencing programs require knowledge on how to use them for conferencing and require knowledge on how to configure them for

application sharing.” ’203 Patent, 1:39-42. The ’203 Patent describes and claims a solution to sharing a document (as opposed to simply sharing a window) in real-time with audience members in connection with maintaining status information about the audience members that is available to the host for improved conference administration.

45. The inventors recognized that “it would be desirable to enable a user to share applications without having to have any knowledge of an underlying application” and that “[t]hus, an application sharing interface is needed which is easier to use than those heretofore.” ’203 Patent, 1:56-60.

46. The claimed subject matter of the ’203 Patent provides a technical solution to problems in the prior art by “provid[ing] method[s] and apparatus for an application-sharing interface. More particularly, an aspect of the present invention is an interface program for application sharing. This interface program facilitates application sharing by reducing prior art complexity associated therewith. In particular, this interface program allows application sharing to be minimally established by selecting one or more documents to be shared and one or more participants with whom to share such one or more documents. After which, connectivity and any associated activity is automatically initiated.” ’203 Patent, 1:64 – 2:7.

47. In an embodiment described in the '203 Patent, the interface program “uses two user steps for invoking application sharing: accordingly, in any order selecting one or more documents [] and selecting one or more persons []. Notably, a set of documents or a set of persons may be selected to avoid having to select individual documents or participants.” '203 Patent, 4:35-37.

48. Claims 34 and 35 of the '203 Patent recite:

34. A system for application sharing, comprising:
a call manager, the call manager having an interface program;
a plurality of communication devices for electrical communication with the call manager;
the call manager configured to manage calls to and from the plurality of communication devices for establishing connectivity for the application sharing; and
the interface program in cooperation with the call manager configured to maintain status information regarding the connectivity, the status information including current number of active participants.

35. The system of claim **34**, wherein the interface program automatically establishes at least a substantially real-time shared viewing of at least one document between at least one audience member and a host user, wherein the host user only selects the at least one document to be shared and the at least one audience member with whom to share the at least one document to initiate the substantially real-time shared viewing.

49. A person skilled in the art at the time of the inventions claimed in the '203 Patent would recognize that then-existing systems lacked real-time shared viewing and user status information.

50. A person skilled in the art at the time of the invention would understand that the improvements of claim 35 of the '203 Patent allow the users to share documents (as opposed to application windows) and view status information regarding connectivity and a current number of active participants.

51. Claim 36 of the '203 Patent includes the additional limitation of providing an active list of names of the participants as shown in Fig. 11F below.

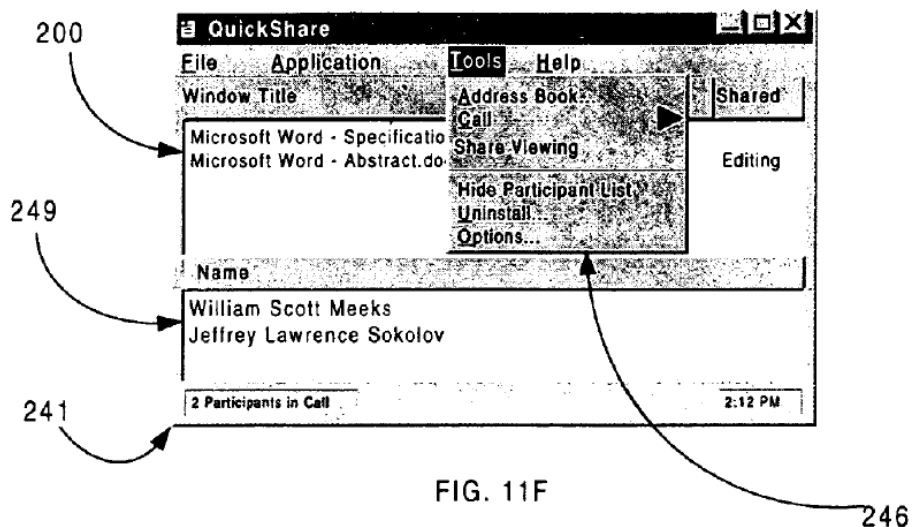


FIG. 11F

ZOOM VIDEO COMMUNICATIONS, INC.



52. Zoom was founded in 2011.

53. Zoom claims to be the “leader in modern enterprise video communications, with an easy, reliable cloud platform for video and audio

conferencing, collaboration, chat and webinars across mobile devices, desktops, telephones and room systems.”

Zoom is the leader in modern enterprise video communications, with an easy, reliable cloud platform for video and audio conferencing, collaboration, chat, and webinars across mobile devices, desktops, telephones, and room systems. Zoom Rooms is the original software-based conference room solution used around the world in board, conference, huddle, and training rooms, as well as executive offices and classrooms. Founded in 2011, Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Zoom is a publicly traded company on Nasdaq (ticker: ZM) and headquartered in San Jose, California.

54. Zoom’s mission is to make video communications frictionless.

Our mission

Make video
communications
frictionless

55. Zoom cares for “our company, customers, community, teammates, and ourselves.”

Our values

We care for our company,
customers, community,
teammates, and ourselves

56. Zoom provides a video-first communications platform.

Overview

Our mission is to make video communications frictionless.

We provide a video-first communications platform that delivers happiness and fundamentally changes how people interact. We connect people through frictionless video, voice, chat, and content sharing and enable face-to-face video experiences for thousands of people in a single meeting across disparate devices and locations. Our cloud-native platform delivers reliable, high-quality video that is easy to use, manage and deploy, provides an attractive return on investment, is scalable, and easily integrates with physical spaces and applications. We believe that rich and reliable communications lead to interactions that build greater empathy and trust. We strive to live up to the trust our customers place in us by delivering a communications solution that “just works.” Our goal is to make Zoom meetings better than in-person meetings.

We generate revenue from the sale of subscriptions to our video-first communications platform. Subscription revenue is driven primarily by the number of paid hosts, as well as purchases of additional products including Zoom Rooms, Zoom Video Webinars, and Zoom Phone. A host is any user of our video-first communications platform who initiates a Zoom Meeting and invites one or more participants to join that meeting. We refer to hosts who subscribe to a paid Zoom Meeting plan as “paid hosts.” We define a customer as a separate and distinct buying entity, which can be a single paid host or an organization of any size (including a distinct unit of an organization) that has multiple paid hosts. Our Basic offering is free and gives hosts access to Zoom Meetings with core features but with limitations on the number of attendees and time. Our paid offerings include our Pro, Business, and Enterprise plans, which provide incremental features and functionality, such as different participant limits, administrative controls, and reporting.

57. Zoom connects people through frictionless video, voice, chat, and content sharing.

58. Zoom’s cloud-native platform delivers reliable, high quality video that is easy to use, manage and deploy.

59. Zoom’s cloud-native platform provides an attractive return on investment, is scalable, and easily integrates with physical spaces and applications.

60. Zoom generates revenue from the sale of subscriptions to its video-first communications platform.

61. Zoom’s subscription revenue is driven primarily by the number of paid hosts, as well as purchases of additional product including Zoom Rooms, Zoom Video Webinars, and Zoom Phone.

62. Zoom considers a host to be any user of its video-first communications platform who initiates a Zoom Meeting and invites one or more participants to join that meeting.

63. Zoom refers to hosts who subscribe to a paid Zoom Meeting plan as “paid hosts.”

64. Zoom defines a customer as a separate and distinct buying entity, which can be a single paid host or an organization of any size (including a distinct unit of an organization) that has multiple paid hosts.

65. Zoom’s Basic offering is a free.

66. Zoom’s Basic offering gives hosts access to Zoom Meetings with core features but with limitations on the number of attendees and time.

67. Zoom’s paid offerings include its Pro, Business, and Enterprise plans.

68. Zoom’s paid offerings provide incremental features and functionality, such as different participant limits, administrative controls, and reporting.

Zoom Meeting Plans for Your Business

[Zoom for Education](#) | [Zoom for Telehealth](#) | [Zoom for Developers](#)

Basic	Pro	Business	Enterprise
Personal Meeting	Great for Small Teams	Small & Med Businesses	Large Enterprise-Ready
Free	\$14.99 /mo/host	\$19.99 /mo/host	\$19.99 /mo/host
Sign up, It's Free	Buy Now	Buy Now	Contact Sales
Host up to 100 participants	All Basic features +	All Pro features +	All Business features +
Unlimited 1 to 1 meetings	Includes 100 participants Need more participants?	Includes 100 participants Need more participants?	Up to 1,000 participants
40 mins limit on group meetings	Meeting duration limit is 24 hrs	Dedicated phone support	Unlimited Cloud Storage
Unlimited number of meetings	User management	Admin dashboard	Dedicated Customer Success Manager
Online support	Admin feature controls	Vanity URL	Executive Business Reviews
+ Video Conferencing Features	Reporting	Option for on-premise deployment	Bundle discounts on Webinars and Zoom Rooms
+ Web Conferencing Features	Custom Personal Meeting ID	Managed domains	
+ Group Collaboration Features	Assign scheduler	Single sign-on	
+ Security	1GB of MP4 or M4A cloud recording	Company branding	
	REST API	Custom emails	
	Skype for Business (Lync) interoperability	LTI integration	
	+ Optional Add-on Plans	Cloud Recording Transcripts	
		+ Optional Add-on Plans	

69. Zoom’s products and services include the ability to share an application (including a document) between the host and audience members.

Group Collaboration

- Mac, Windows, Linux, Chromebooks, iOS and Android
- Group messaging (/feature/messaging)
- Screen share documents, photos and video clips (/feature/share)
- Simultaneous screen sharing
- iPhone/iPad screen share with iOS mirror
- Annotation and co-annotation
- Keyboard and mouse control
- Whiteboarding



70. Zoom’s product called “Zoom Meetings” includes features for associating a participant’s telephone connection with their data connection and sharing applications with video-conferencing members.

71. Zoom provides a Support Center at <https://support.zoom.us/hc/en-us>

72. The Zoom Support Center at <https://support.zoom.us/hc/en-us> teaches users how to take advantage of the capabilities of its products.

73. Zoom provides accurate information concerning its Meetings product at <https://support.zoom.us/hc/en-us>

74. Zoom provides accurate information concerning its Meetings product at https://support.zoom.us/hc/en-us/categories/200108436?flash_digest=59ad4c464358a3feb6607cba95891d7a85207fbb

75. Zoom provides accurate information concerning its Zoom Rooms product at <https://support.zoom.us/hc/en-us/articles/205000945-Zoom-Rooms-Overview-Video>

76. Zoom provides accurate information concerning its Zoom Rooms product at <https://support.zoom.us/hc/en-us/articles/203727929-Screen-Sharing-with-Zoom-Rooms>

77. Zoom provides accurate information concerning its Meetings product at <https://support.zoom.us/hc/en-us/categories/201137166> .

78. Zoom provides training and frequent webinars to instruct end users how to use its products including through Live Training as shown by <https://zoom.us/livetraining> .

COUNT I – DIRECT PATENT INFRINGEMENT OF '392 PATENT

79. Plaintiff realleges and incorporates by reference the allegations set forth above, as if set forth verbatim herein.

80. Defendant has directly infringed the '392 Patent in violation of 35 U.S.C. § 271(a) by performing methods, including its own use and testing of Zoom Meetings (including Basic, Pro, Business, and Enterprise) and other branded solutions including, upon information and belief, Zoom Rooms and also including other audio and video conferencing solutions with the same or similar features and

functionality as detailed in Count I (collectively “Zoom Meetings” or “Accused Products”) that embody the patented inventions of claims 1 and 5 of the ’392 Patent.

81. Defendant’s infringing Accused Products include, without limitation, Zoom Meetings and other Zoom solutions including audio and video conferencing solutions with the same or similar features and functionality that satisfy each element of one or more asserted claims of the ’392 Patent.

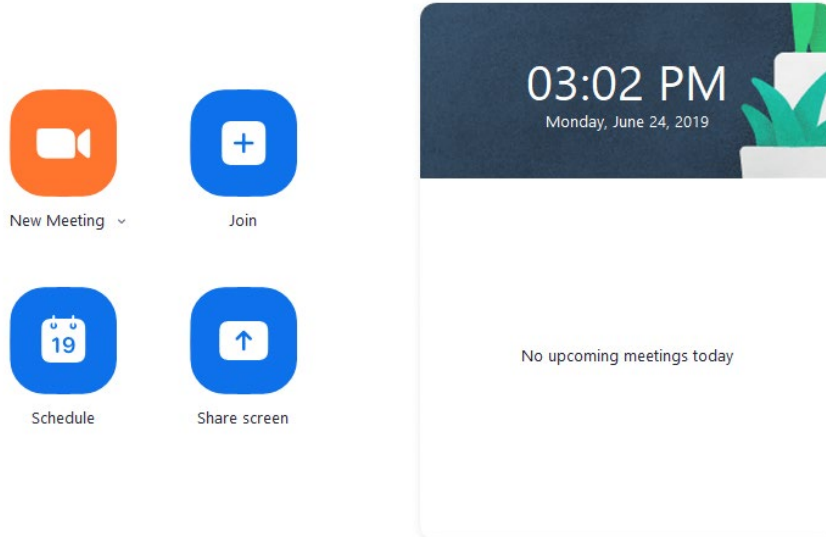
82. The Accused Products satisfy each and every element of each asserted claim of the ’392 Patent either literally or under the doctrine of equivalents.

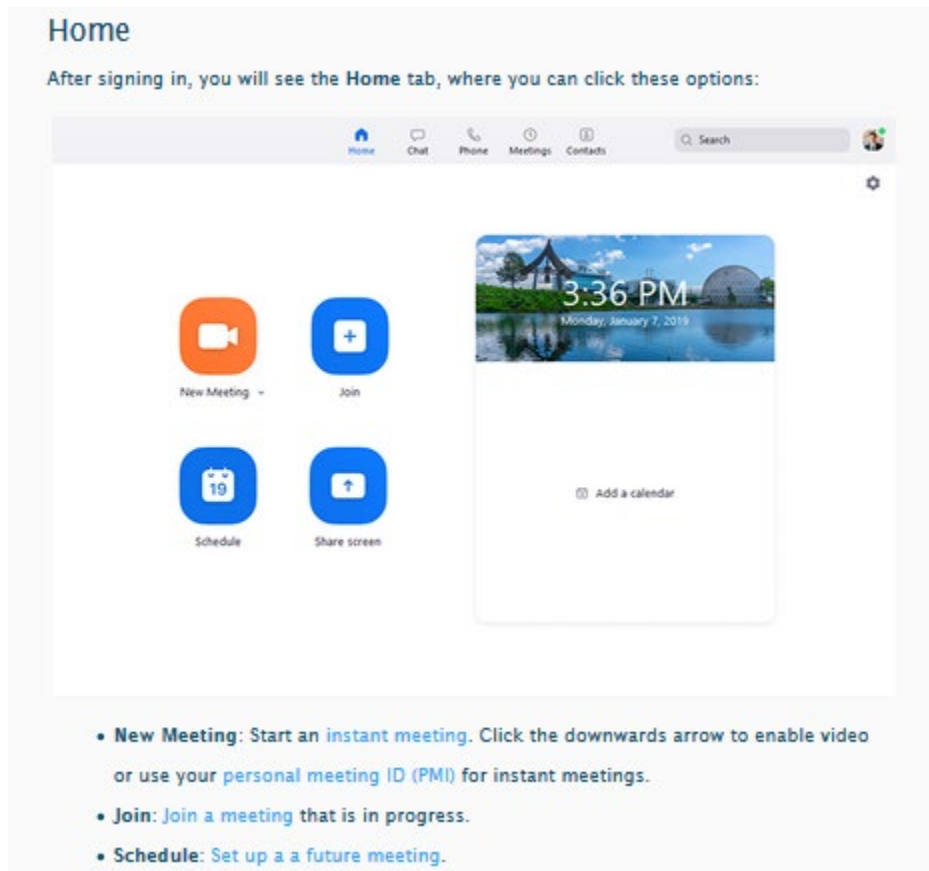
83. According to <https://support.zoom.us/hc/en-us/articles/201362033-Getting-Started-on-Windows-and-Mac> Zoom unifies cloud video conferencing, simple online meetings, and group messaging into one easy-to-use platform that “offers the best video, audio, and wireless screen-sharing experience across multiple platforms.”

84. The Zoom Accused Products are “high quality video and audio conferencing products” with which “you can collaborate with colleagues, give presentations, perform product demonstrations, and deliver companywide messages to up to 10,000 attendees.” <https://zoom.us/docs/doc/2-Page-All-Products.pdf> The Zoom Accused Products operationally associate a participant’s telephone connection to a conference call system (e.g. Zoom Meetings) with a data connection

from said participant's computer screen to a conference call system (e.g. Zoom Meetings), wherein the Zoom Accused Products establish voice connections between itself and multiple conference call participants.

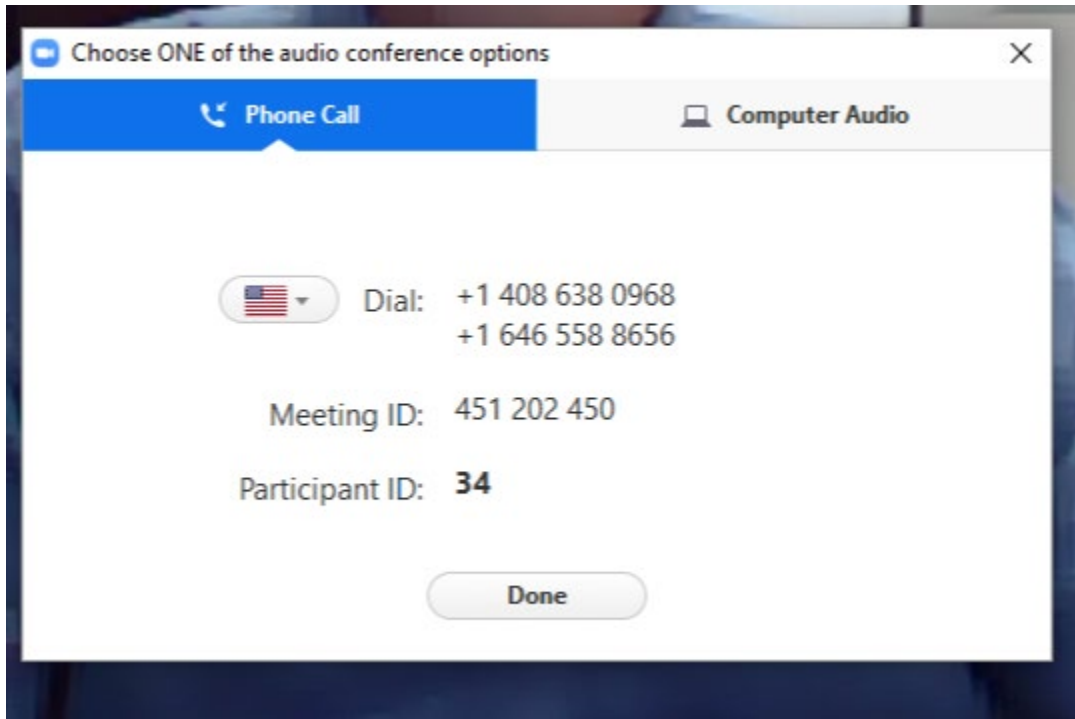
85. The Zoom Accused Products include options to schedule a meeting in advance or start a new meeting instantly.





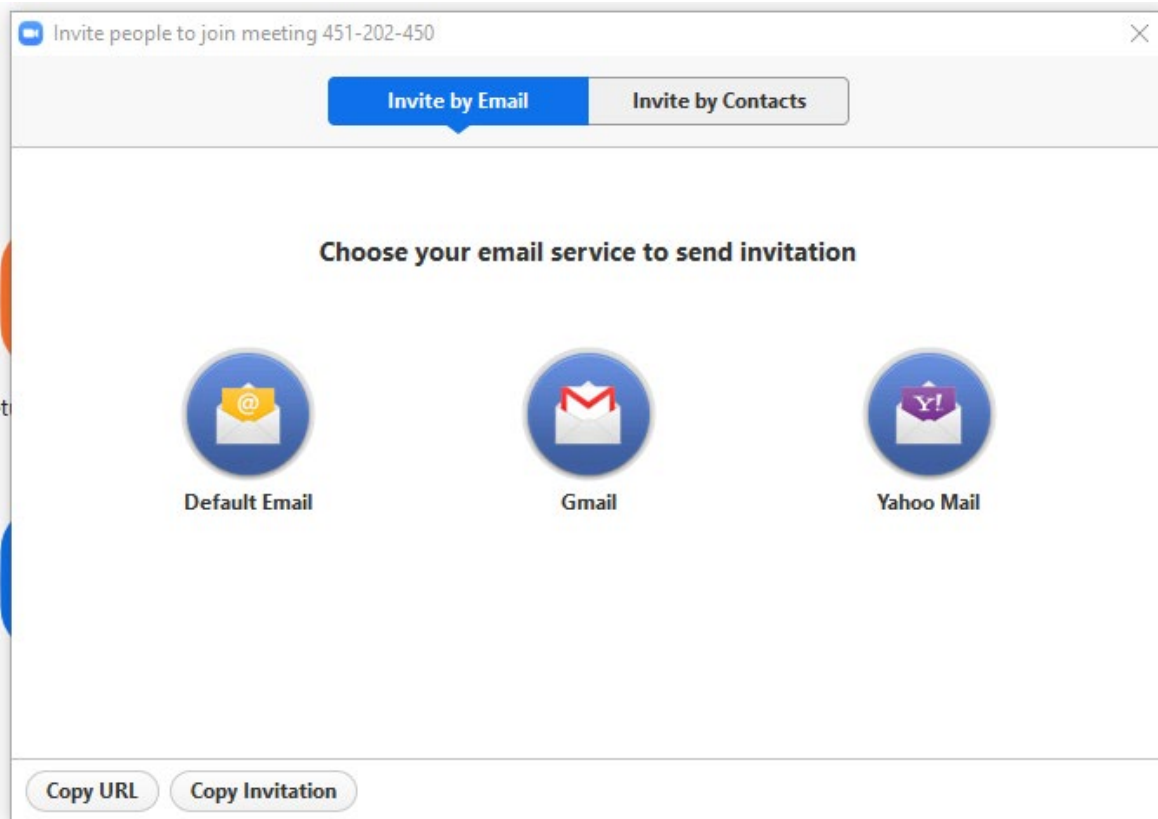
<https://support.zoom.us/hc/en-us/articles/201362033-Getting-Started-on-Windows-and-Mac>

86. With the Zoom Accused Products, participants can dial-in to the conference call system.








87. Zoom’s Accused Products establish a data connection between the participants computer and the conference system (e.g. Zoom Meetings).

88. Zoom’s Accused Products provide a “Meeting ID” that can be shared through email or through other methods (e.g. copied link). That Meeting ID or conference access code is specific to the conference call.



- □ ×

Format Insert Draw ▾  Discard  Send

  Heading 1 ▾  Undo ▾

From:  

To:   Cc & Bcc

Please join Zoom meeting in progress

Join Zoom Meeting
<https://zoom.us/j/451202450>

One tap mobile
+14086380968,,451202450# US (San Jose)
+16465588656,,451202450# US (New York)

Dial by your location
+1 408 638 0968 US (San Jose)
+1 646 558 8656 US (New York)
Meeting ID: 451 202 450
Find your local number: <https://zoom.us/u/ac9ljsRiQ>

Sent from [Mail](#) for Windows 10

Prerequisites

- Each meeting has a unique 9, 10, or 11-digit number called a **meeting ID** that will be required to join a Zoom meeting
- If you are joining via telephone, you will need the **teleconferencing number** provided in the invite.

 Windows |  Mac

1. Open the Zoom desktop client.
2. Join a meeting using one of these methods:
 - Click **Join a Meeting** if you want to join without signing in.

zoom

Join a Meeting

Sign In

- Sign in to Zoom then click **Join**.



Join

3. Enter the **meeting ID** number and your display name.
 - If you're signed in, change your name if you don't want your **default name** to appear.
 - If you're not signed in, enter a display name.

Join a Meeting

Meeting ID or Personal Link Name 

Grant MacLaren

Do not connect to audio

Turn off my video

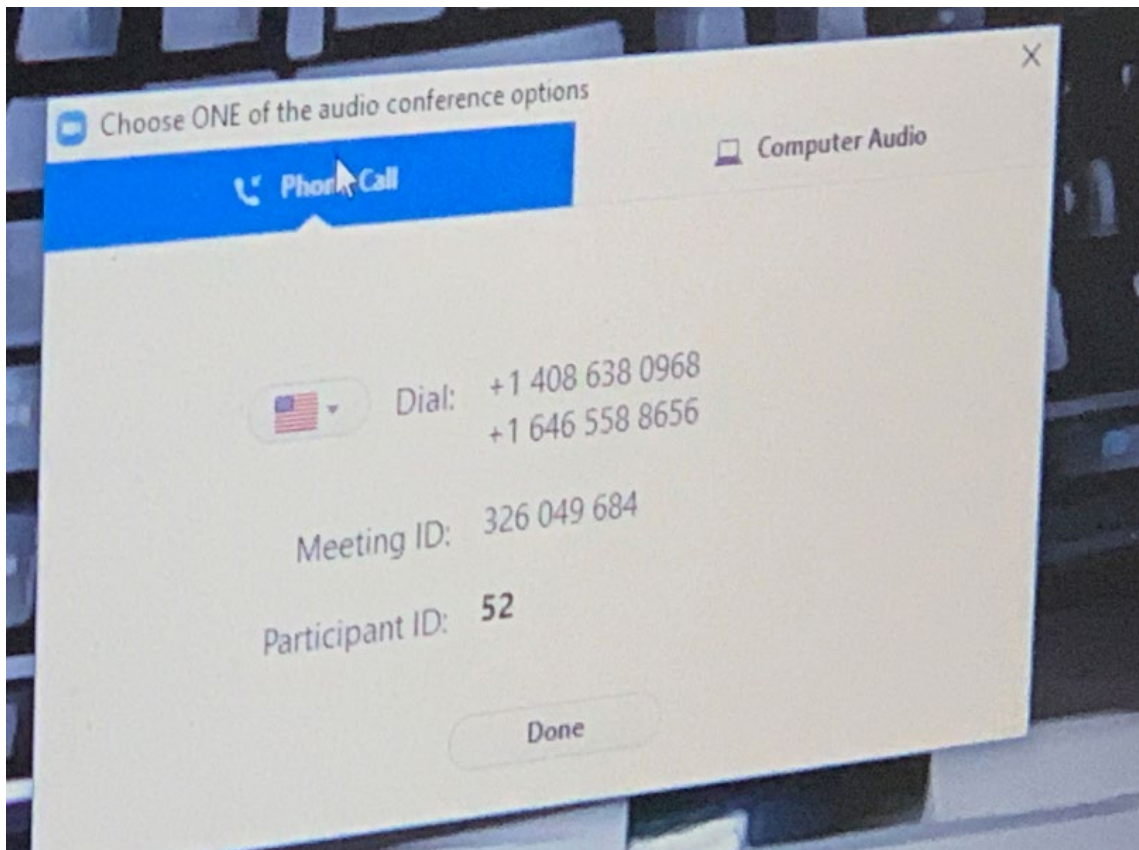
Join

Cancel

4. Select if you would like to connect audio and/or video and click **Join**.

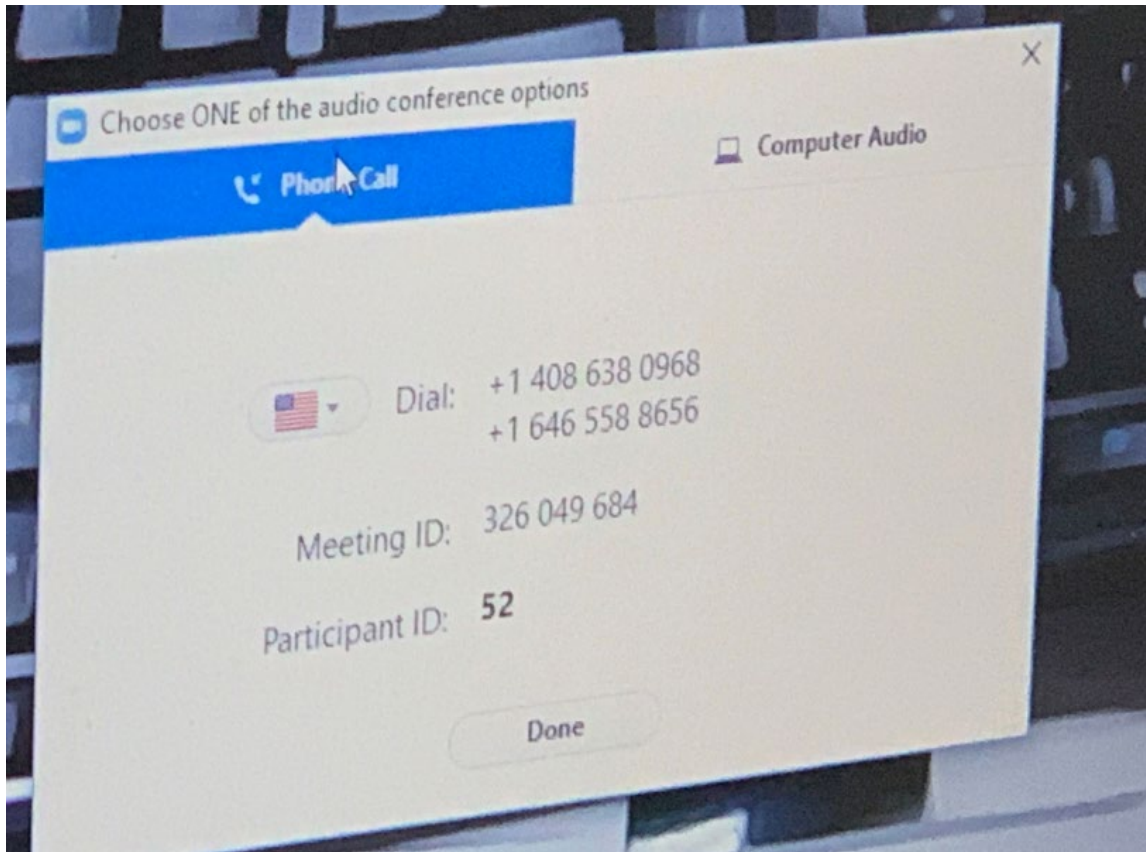
<https://support.zoom.us/hc/en-us/articles/201362193-Joining-a-Meeting>

89. Upon receiving the Meeting ID and choosing the “Phone Call” tab, the Zoom Accused Products generate a personal identification number (Participant ID) unique to the conference and send the personal identification number over the participant’s data connection.



90. The Zoom Accused Products allow participants to enter a dial-in number followed by the Meeting ID and Participant ID.

91. The Zoom Accused Products display dialing instructions on the participant’s computer screen explaining how to enter the conference.

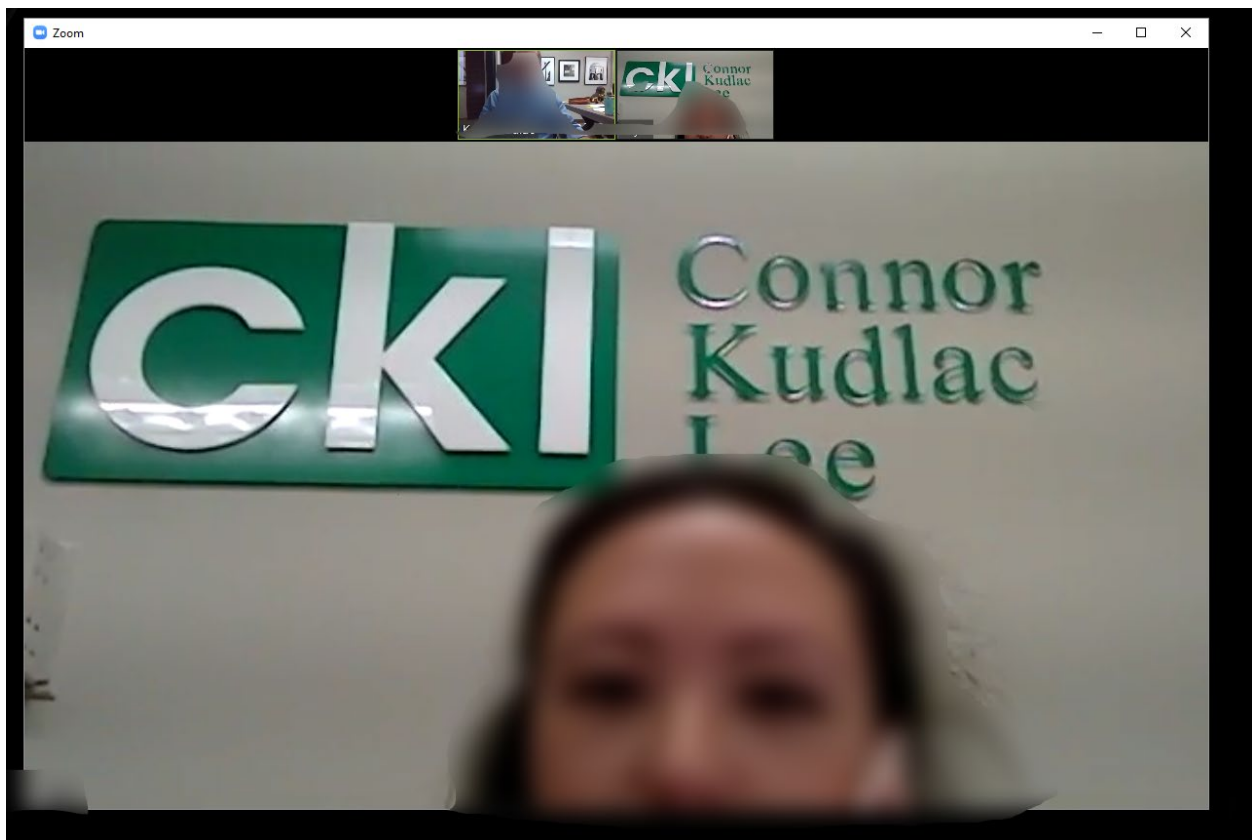


92. As shown in the image above, in Zoom Meetings, the unique code (Participant ID) is displayed to the participant over the participant's computer screen.

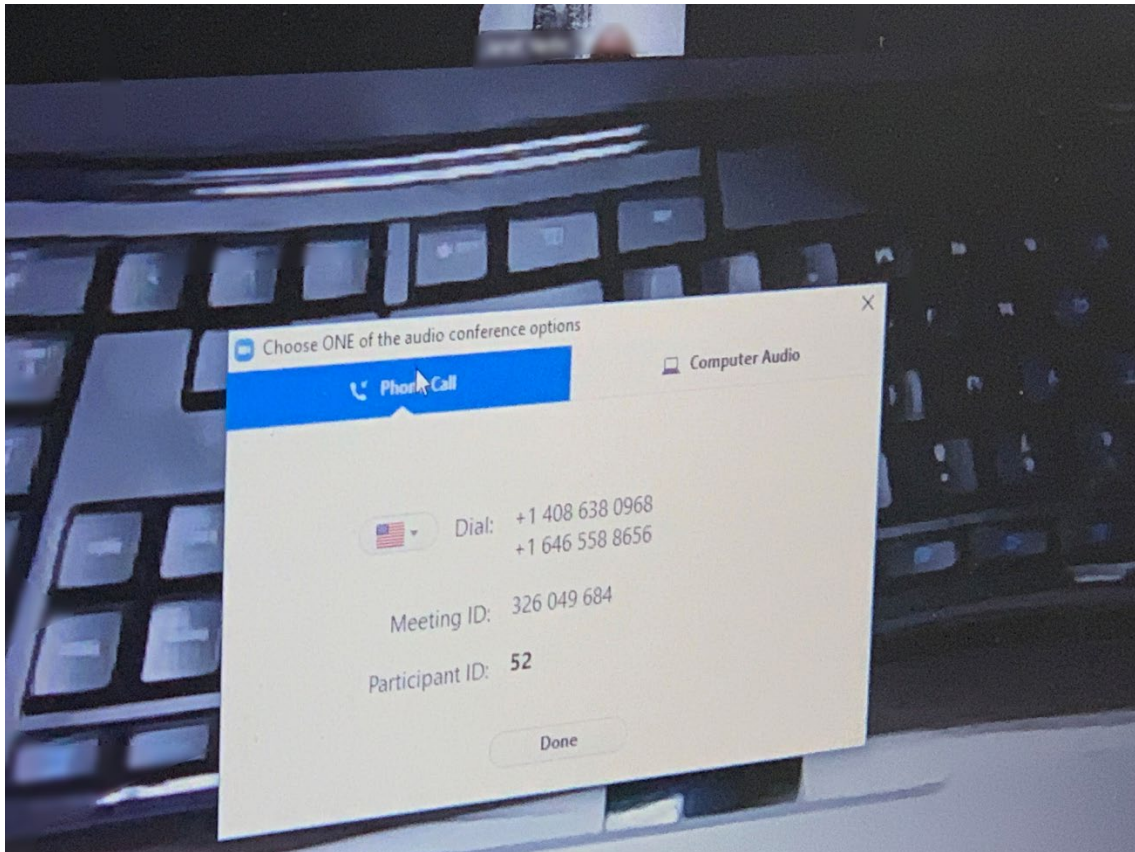
93. In the Zoom Accused Products, when the participant, chooses "Phone Call" and dials the displayed number, the participant is instructed via voice prompt to enter the unique code (Participant ID) (as well as a Meeting ID) over their telephone connection to the Zoom Accused Products. The image above shows the selection of "Phone Call."

94. In the Zoom Accused Products, a participant has established a data connection and a phone (audio) connection after choosing “Phone Call” and entering the requested information (Meeting ID and Participant ID).

95. In the Zoom Accused Products after entering the unique code (Participant ID), the data connection and the phone connection are operationally associated. That the data connection and the phone connection are operationally associated can be determined by viewing the Hosts screen which will switch to show the active speaker in the main video portion of the screen.



96. In the Zoom Accused Products the conference control web page specific to that participant and the participant's telephone connection is displayed.



97. Defendant's infringing activities are and have been without authority or license under the '392 Patent.

98. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's infringing 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, pursuant to 35 U.S.C. § 284.

COUNT II – INDUCED PATENT INFRINGEMENT OF '392 PATENT

99. Plaintiff realleges and incorporates by reference the allegations set forth above, as if set forth verbatim herein.

100. As detailed in Count I above, Defendant has instructed its customers to use the accused methods in an infringing manner.

101. Zoom's analysis and knowledge of the '392 Patent combined with its ongoing activity demonstrates Zoom's knowledge and intent that the identified features of its products be used to infringe the '392 Patent.

102. Zoom's knowledge of the '392 Patent and Plaintiff's infringement allegations against Zoom combined with its knowledge of the Accused Products and how they are used to infringe the '392 Patent, consistent with Zoom's promotions and instructions, demonstrate Zoom's specific intent to induce Zoom's users to infringe the '392 Patent since filing of this Complaint.

103. Plaintiff is entitled to recover from Zoom compensation in the form of monetary damages suffered as a result of Zoom's infringement in an amount that cannot be less than a reasonable royalty together with interest and costs as fixed by this Court.

COUNT III – DIRECT PATENT INFRINGEMENT OF '203 PATENT

104. Plaintiff realleges and incorporates by reference the allegations set forth above, as if set forth verbatim herein.

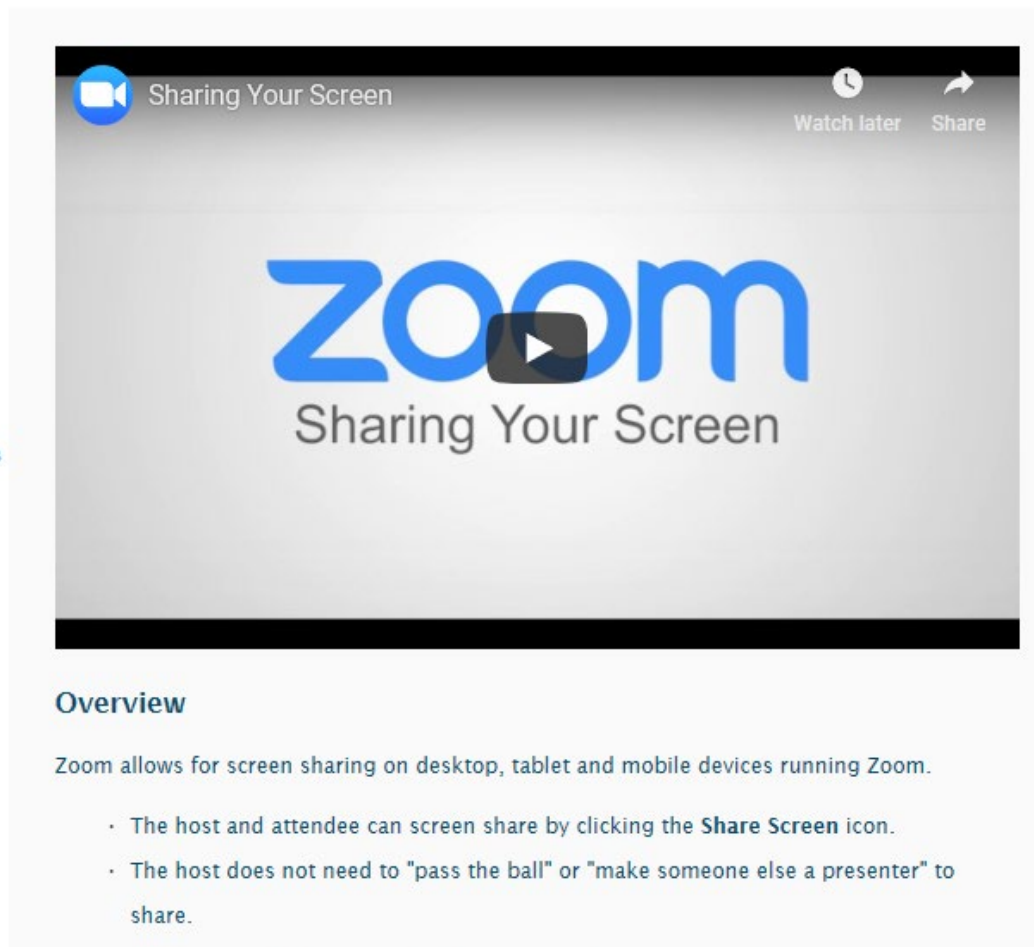
105. Defendant has directly infringed the '203 Patent in violation of 35 U.S.C. § 271(a) by making, using (including its own use and testing), selling, or offering to sell in the United States, or importing into the United States products that embody the inventions of claims 34-39 of the '203 Patent including Zoom Meetings (including Basic, Pro, Business, and Enterprise) and other branded solutions including, upon information and belief, Zoom Rooms and also including other audio and video conferencing solutions with the same or similar features and functionality as detailed in Count III (collectively “Zoom Meetings” or “Accused Products”).

106. Defendant’s infringing Accused Products include, without limitation, Zoom Meetings and other Zoom solutions including audio and video conferencing solutions with the same or similar features and functionality that satisfy each element of one or more asserted claims of the '203 Patent.

107. The Accused Products satisfy each and every element of each asserted claim of the '203 Patent, as detailed herein, either literally or under the doctrine of equivalents.

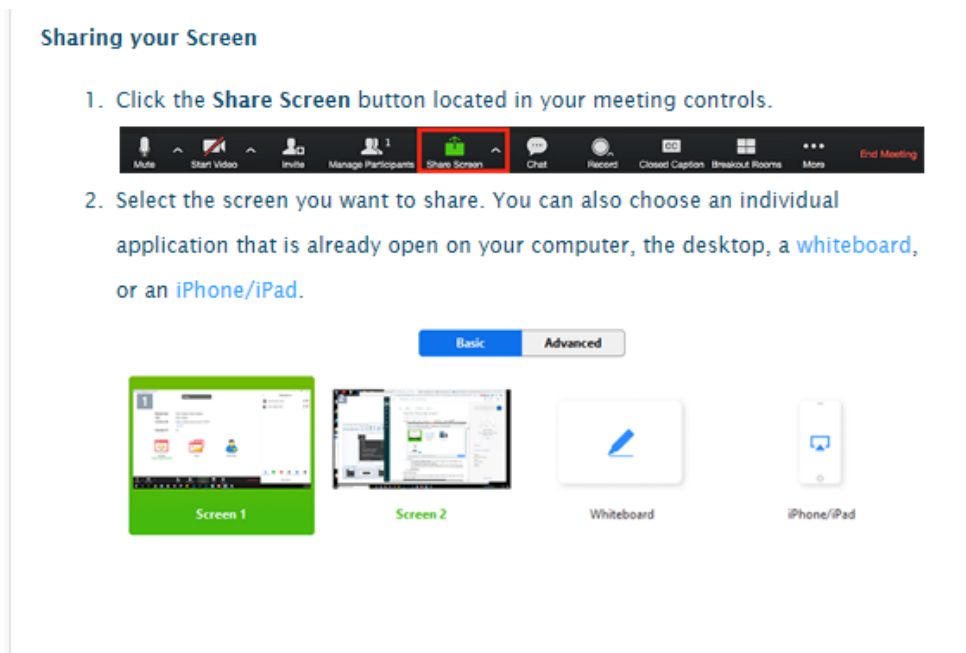
108. According to <https://support.zoom.us/hc/en-us/articles/201362153-How-Do-I-Share-My-Screen-> Defendant's Zoom's Meetings includes features that allow "for screen sharing on desktop, tablet and mobile devices running Zoom."

How Do I Share My Screen?



109. The Zoom Accused Products include a call manager having an interface program, namely the Zoom Meetings downloadable software.

110. According to <https://support.zoom.us/hc/en-us/articles/201362153-How-Do-I-Share-My-Screen-> during a Zoom video conference you can share a specific document (from an application window) with attendees.



111. Zoom's Support Center instructs users how to use Zoom Meetings application.

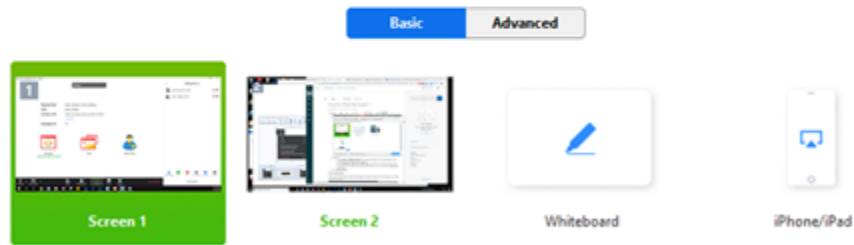
112. Zoom provides instructions in its Support Center at <https://support.zoom.us/hc/en-us/articles/201362153-How-Do-I-Share-My-Screen-> for sharing an application window.

Sharing your Screen

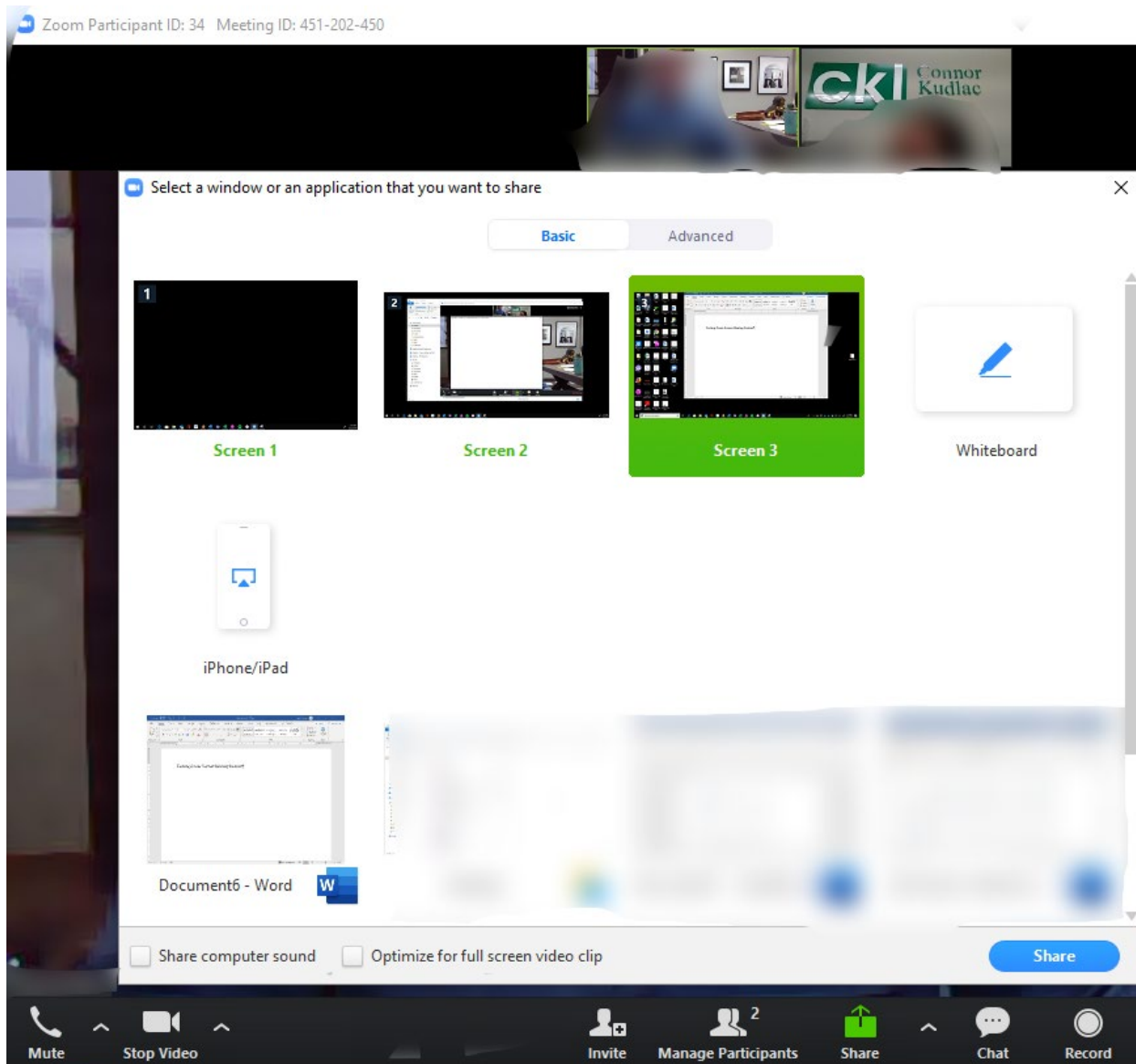
1. Click the **Share Screen** button located in your meeting controls.

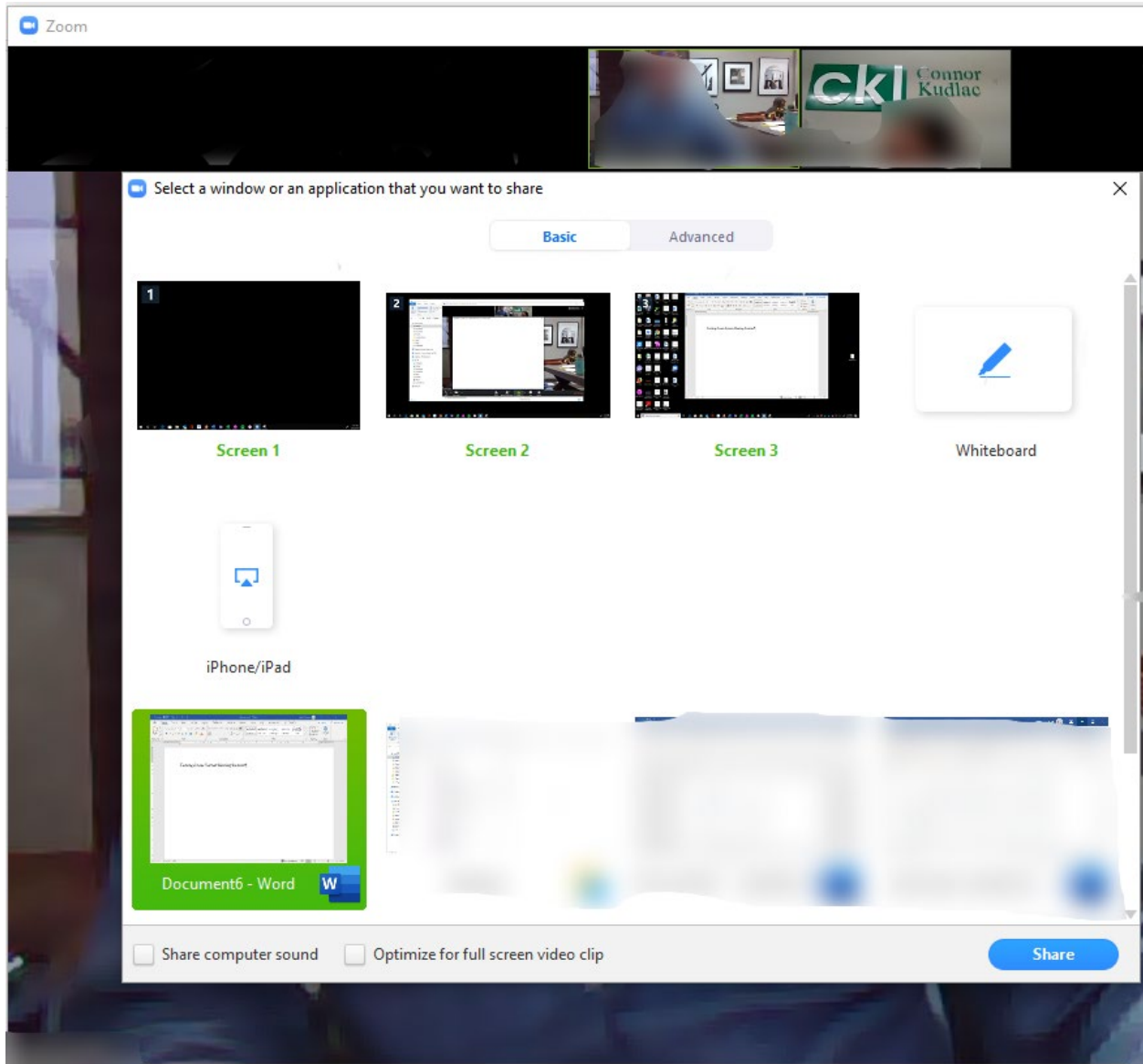


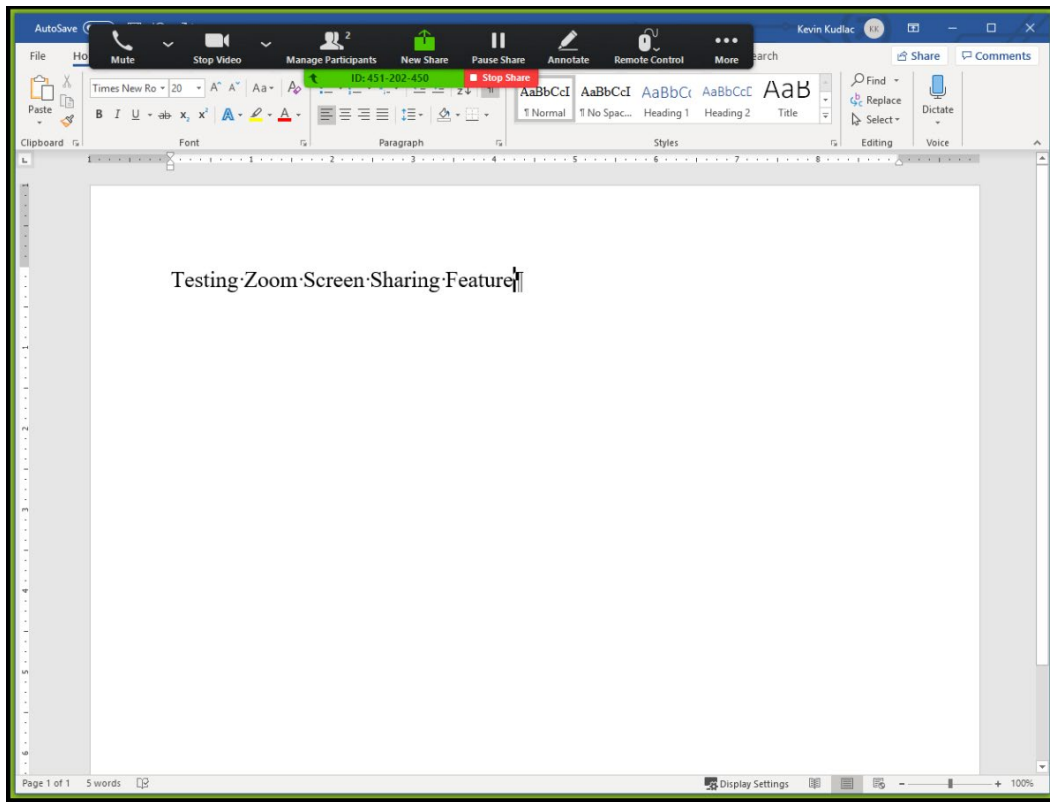
2. Select the screen you want to share. You can also choose an individual application that is already open on your computer, the desktop, a [whiteboard](#), or an [iPhone/iPad](#).



113. Zoom Meetings allows the meeting host to share a particular application window with attendees.

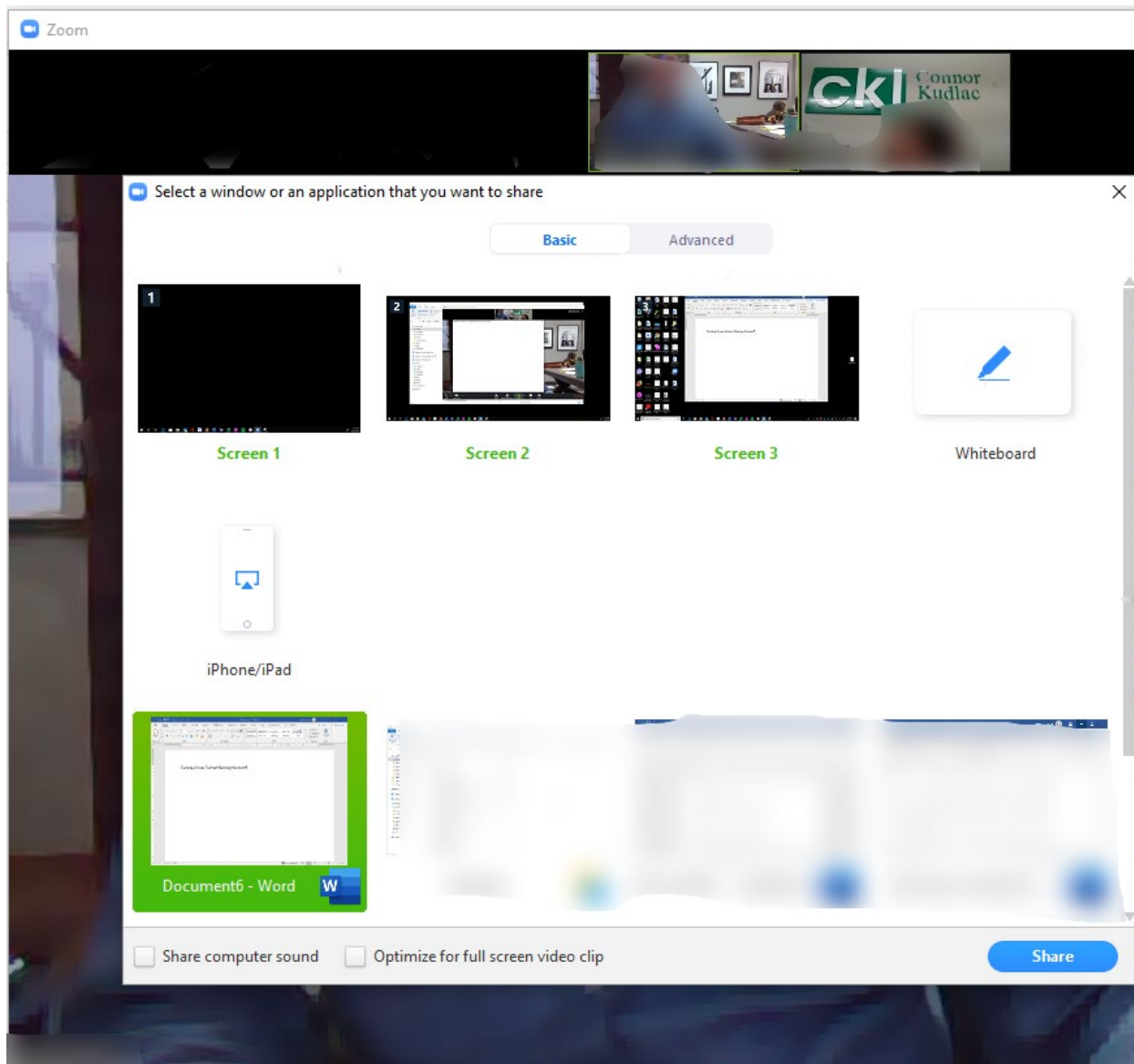


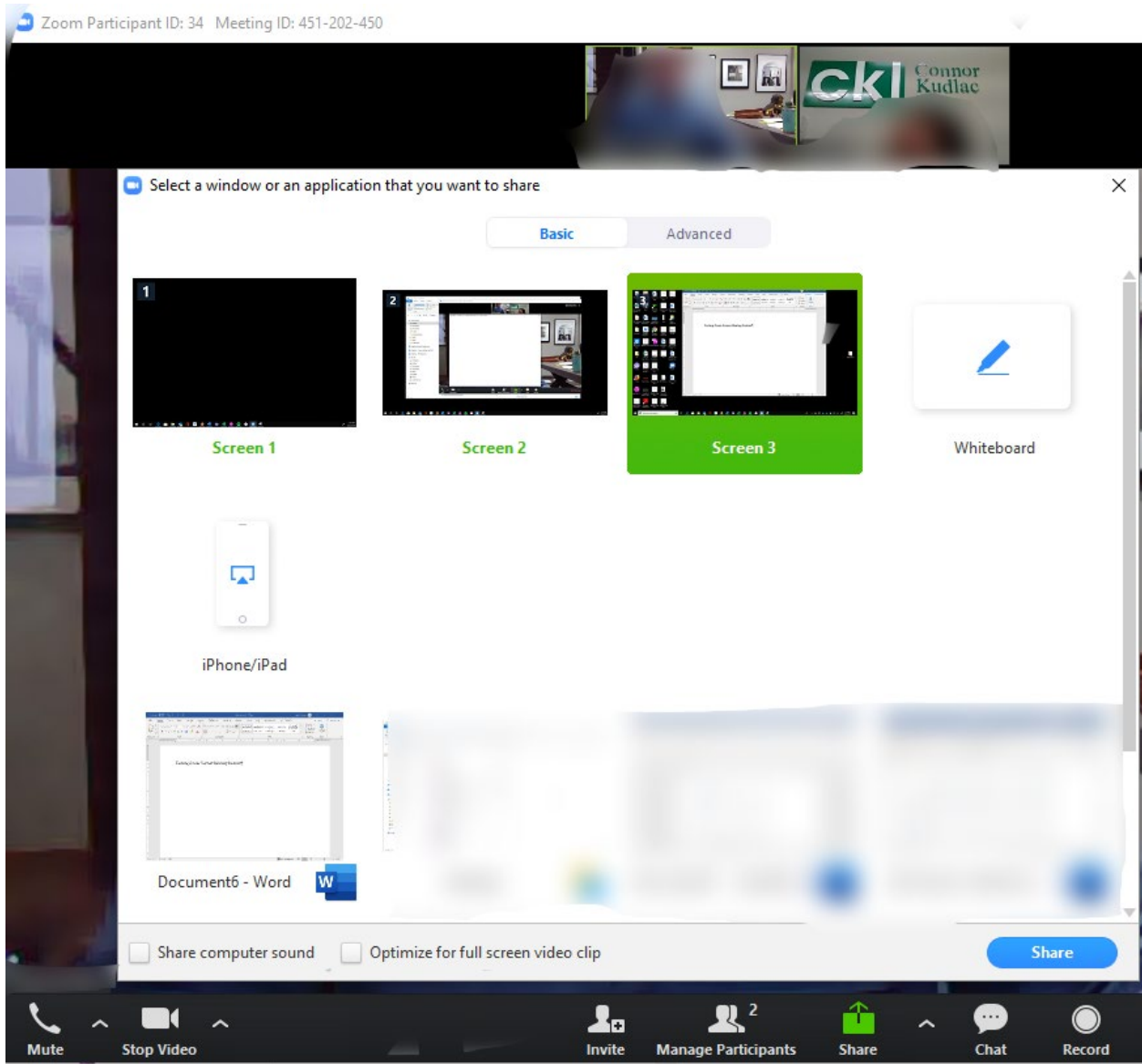




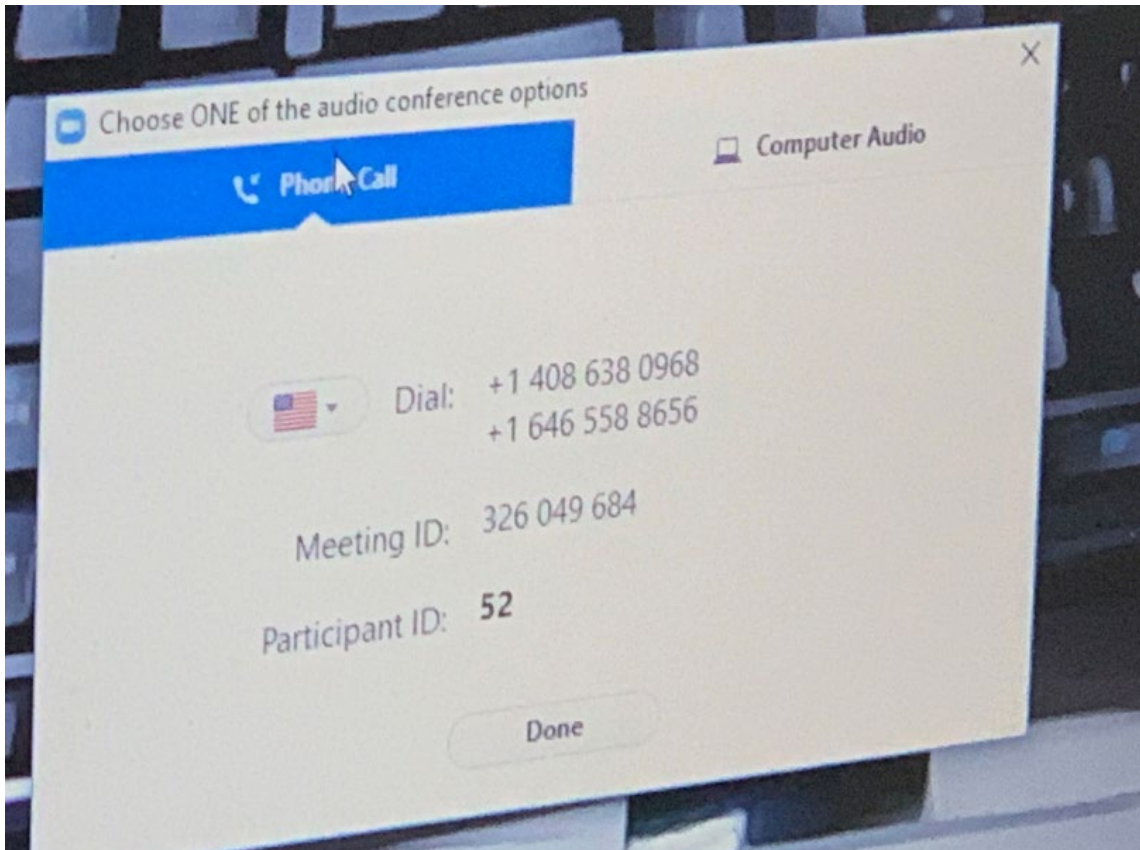
114. When the Zoom Accused Products are used for their intended purposes they include a plurality of communication devices for electrical communications with the call manager.

115. In operation, the Accused Products (as seen in the image below) demonstrates that each of a plurality of communication devices is put into electrical communication with Zoom Meetings.



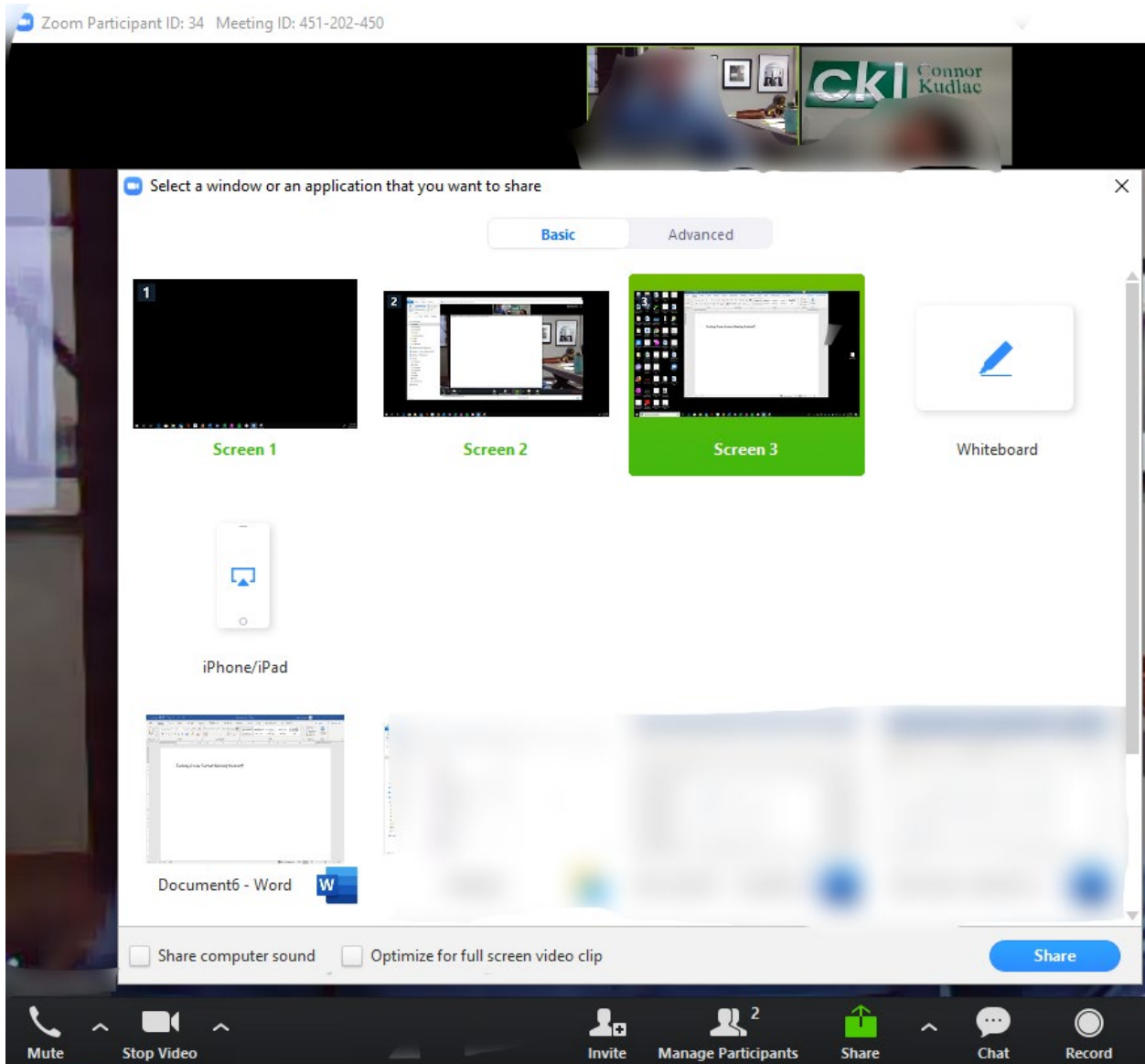


116. Zoom Meetings, for example, includes an interface for receiving calls from (via the Phone Call tab) the plurality of communication devices. This connectivity is then used for application sharing.



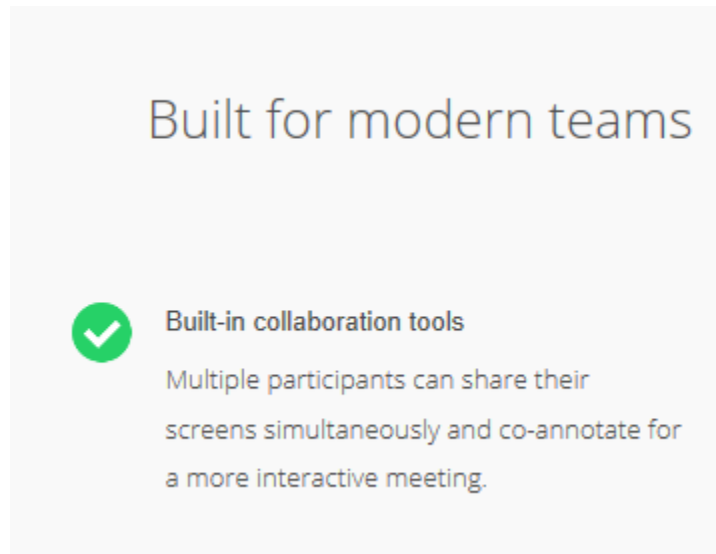
117. The Zoom Accused Products maintains status information regarding the connectivity of participants including the current number of active participants.

118. The picture below shows the number of participants (tw) in the lower portion of the screen where it states “Manage Participants” and has a “2” next to the icon.

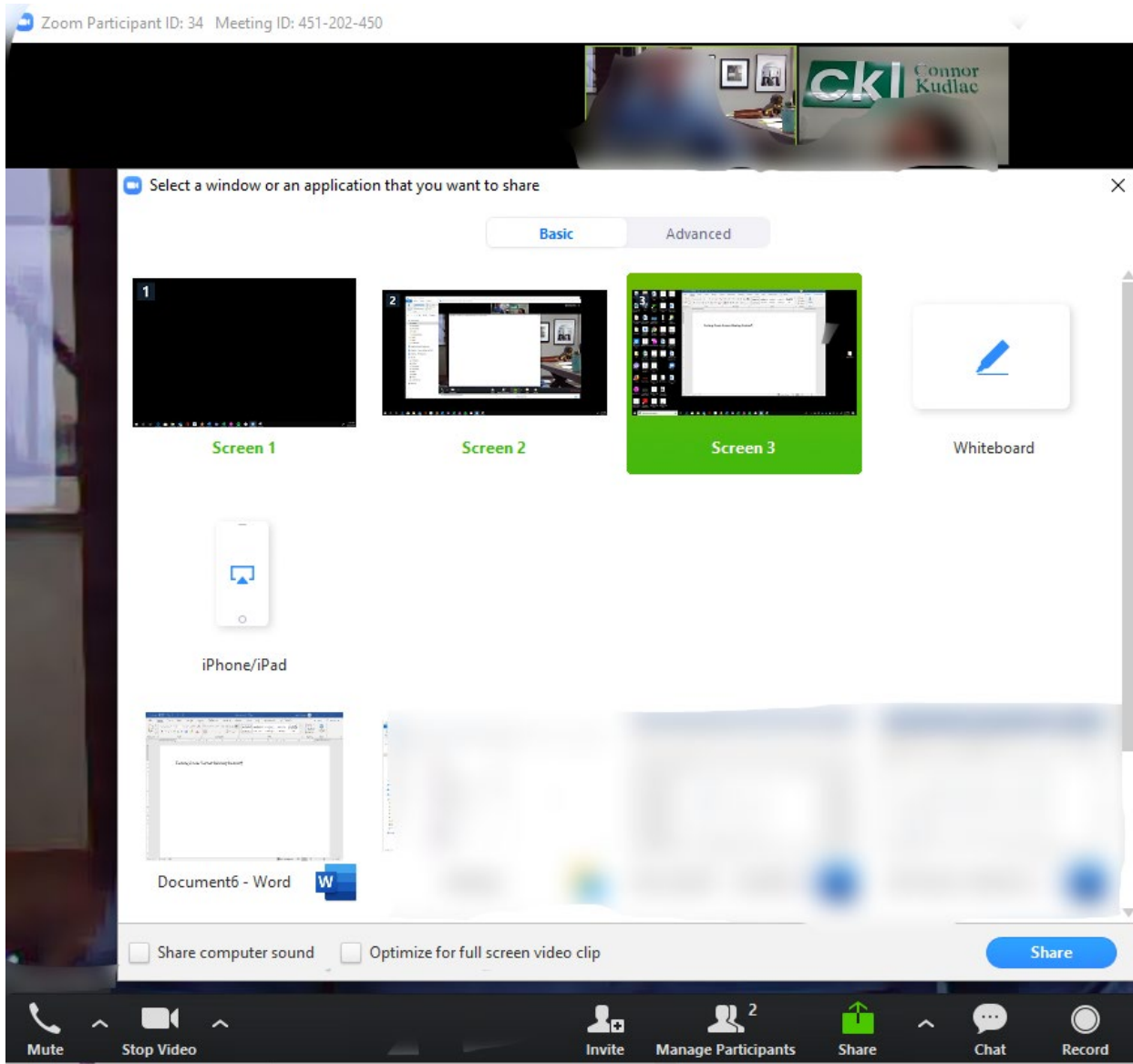


119. The Zoom Accused Products provide software within the interface program that automatically establishes at least a substantially real-time shared viewing of at least one document between at least one audience member and a host user, wherein the host user only selects the at least one document to be shared and

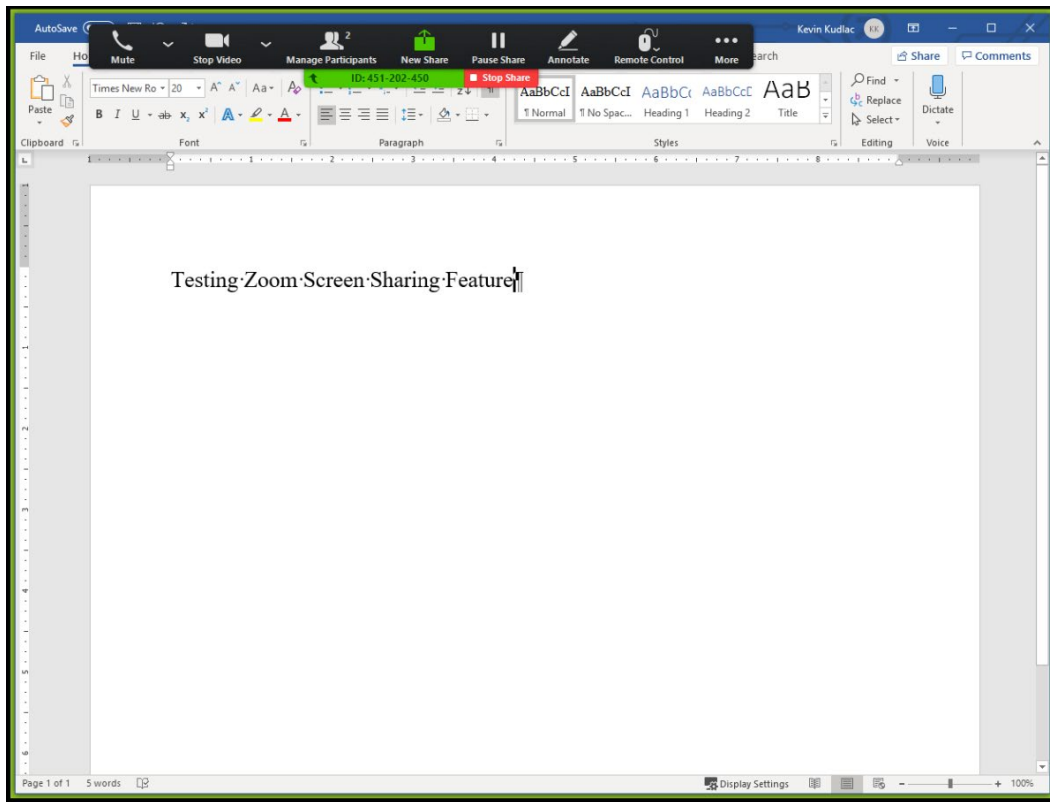
the at least one audience member with whom to share the at least one document to initiate the substantially real-time shared viewing.



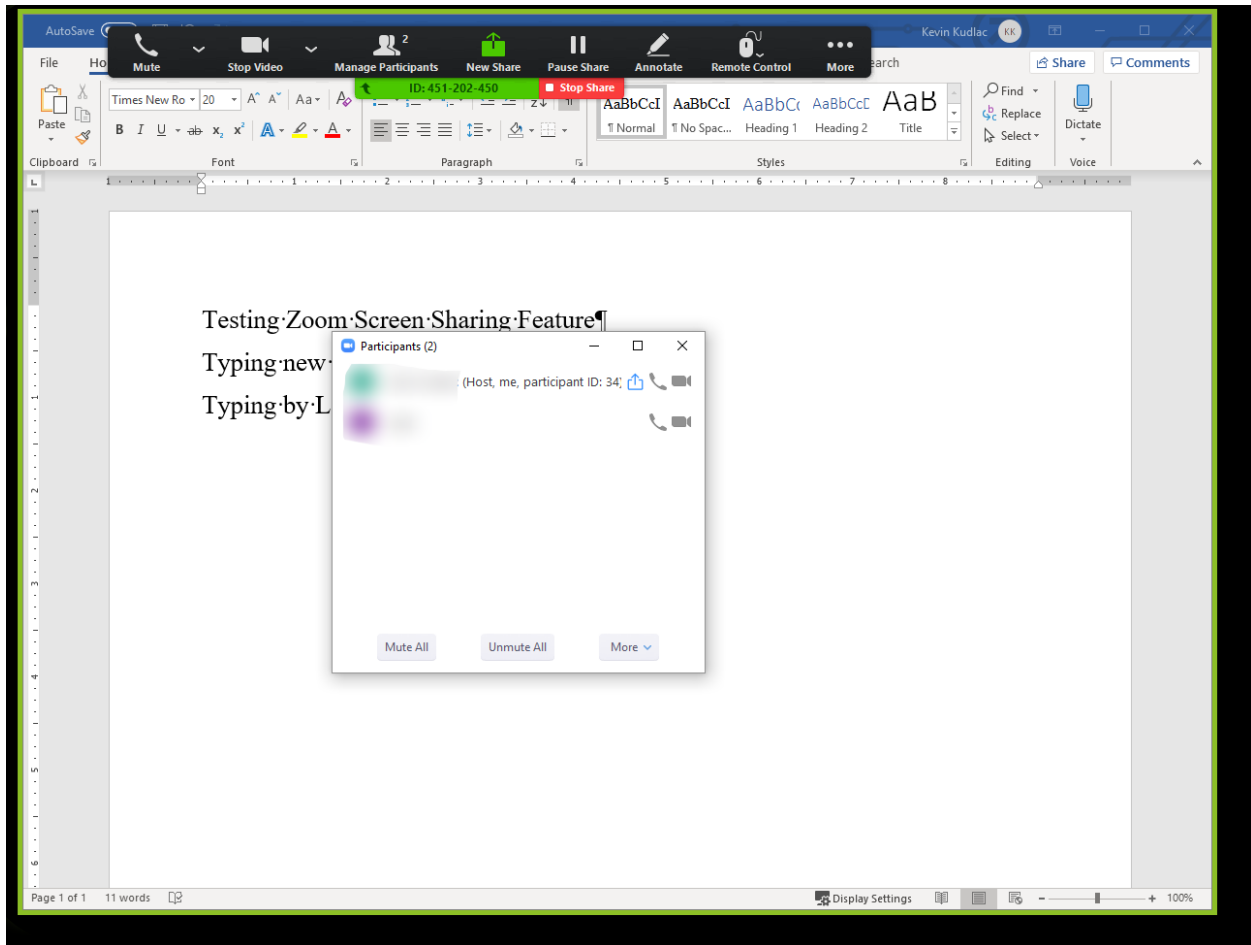
120. After the connections described above have been established, the Host (or, depending on the configuration, other participants) can select the “Share” option which then reveals a list of application windows as well as documents. Thereafter, the Host (or other participant, depending on configuration) can select the document for sharing.



121. After clicking the share button, the selected document is shared with the other participant on the conference.



122. The Zoom Accused Products include a list of active participants which, among other things, can be revealed by clicking the “Manage Participants” icon at the bottom of the screen.



123. Defendant's infringing activities are and have been without authority or license under the '203 Patent.

124. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's infringing 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, pursuant to 35 U.S.C. § 284.

COUNT IV – INDUCED PATENT INFRINGEMENT OF '203 PATENT

125. Plaintiff realleges and incorporates by reference the allegations set forth above, as if set forth verbatim herein.

126. Since the filing of this lawsuit, Defendant has actively and intentionally, with prior knowledge of the '203 Patent and Plaintiff's claims of infringement, induced the direct infringement by others of claims 34-39 of the '203 Patent in violation of 35 U.S.C. § 271(b), in making, using, selling, or offering to sell in the United States, or importing into the United States Accused Products embody the patented invention as described in Count III, above.

127. Furthermore, Defendant has instructed its customers to use the Accused Products in an infringing manner.

128. Zoom's analysis and knowledge of the '203 Patent combined with its ongoing activity demonstrates Zoom's knowledge and intent that the identified features of its products be used to infringe the '203 Patent.

129. Zoom's knowledge of the '203 Patent and Plaintiff's infringement allegations against Zoom combined with its knowledge of the Accused Products and how they are used to infringe the '203 Patent, consistent with Zoom's promotions and instructions, demonstrate Zoom's specific intent to induce Zoom's users to infringe the '203 Patent since filing of this Complaint.

130. Plaintiff is entitled to recover from Zoom compensation in the form of monetary damages suffered as a result of Zoom's infringement in an amount that cannot be less than a reasonable royalty together with interest and costs as fixed by this Court.

JURY DEMAND

131. Plaintiff hereby demands a trial by jury of all issues so triable pursuant to Fed. R. Civ. P. 38.

PRAYER FOR RELIEF

Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- A. An adjudication that one or more claims of the '392 Patent have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- B. An adjudication that one or more claims of the '203 Patent have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- C. An accounting and an award to Plaintiff of damages adequate to compensate Plaintiff for the Defendant's acts of infringement, together

with pre-judgment and post-judgment interest and costs pursuant to 35 U.S.C. § 284;

D. That this Court declare this to be an exceptional case and award Plaintiff its reasonable attorneys' fees and expenses in accordance with 35 U.S.C. § 285; and

E. Any further relief that this Court deems just and proper.

Respectfully submitted this 10th day of July 2019.

By: /s/ Daniel A. Kent

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