

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

RIGHTQUESTION, LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.,
CELLCO PARTNERSHIP D/B/A
VERIZON WIRELESS, VERIZON
BUSINESS NETWORK SERVICES LLC,
VERIZON CORPORATE SERVICES
GROUP INC., and TRACFONE
WIRELESS, INC.,

Defendants.

Civil Action No.: 2:24-cv-00091

JURY TRIAL DEMANDED

**PLAINTIFF RIGHTQUESTION, LLC'S ORIGINAL
COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff RightQuestion, LLC (“RightQuestion”) brings this action for patent infringement against Verizon Communications, Inc., Cellco Partnership d/b/a Verizon Wireless, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., and TracFone Wireless, Inc. (collectively, “Verizon”), and hereby, on knowledge as to its own actions, and upon information and belief as to all other matters, alleges as follows:

NATURE OF THE CASE

1. This is a civil action for Verizon’s infringement of U.S. Patent Nos. 10,674,009 (“the ’009 patent”), 11,005,989 (“the ’989 patent”), and 11,856,132 (“the ’132 patent”) (collectively, the “Patents-in-Suit,” attached hereto as Exhibits 1, 2, and 3, respectively) under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*

2. RightQuestion seeks damages and other relief for Verizon’s infringement of RightQuestion’s patent rights relating to call-authentication technology known as “STIR/SHAKEN,” a suite of protocols and procedures intended to combat caller ID spoofing on public telephone networks.

BACKGROUND

3. The inventions in this case relate to important technology that, *inter alia*, helps rid the public of fraudulent calls and unwanted robocalls from unscrupulous entities. A 2019 declaratory ruling from the Federal Communications Commission estimated that there are 30 billion scam calls a year in the United States, and that the benefit floor for blocking those calls is, conservatively, \$3 billion. *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, adopted June 6, 2019, released June 7, 2019, ¶ 40. <https://docs.fcc.gov/public/attachments/FCC-19-51A1.pdf>.

4. Bjorn Markus Jakobsson, Ph.D., the inventor of the Patents-in-Suit, understood that calling devices and carrier networks can store information that identifies calling devices, including unique identifiers, cryptographic keys and device fingerprints. Utilizing this information, he invented a technology that would, among other things, help avoid unwanted calls, even when a caller deliberately falsifies the information that is transmitted to caller identification (caller ID) to disguise their identity—known colloquially as spoofing. Dr. Jakobsson filed patent applications to protect his invention as early as 2013, and the U.S. Patent & Trademark granted him the ’009, ’989, and ’132 patents.

5. Years after Dr. Jakobsson’s invention, a call-authentication technology called “STIR/SHAKEN” was developed. FCC adopted a Report and Order on March 31, 2020,

mandating that originating and terminating phone companies implement STIR/SHAKEN in their networks by June 30, 2021. *See* Report and Order: Federal Communications Commission, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42A1 (Mar. 31, 2020), available at <https://docs.fcc.gov/public/attachments/FCC-20-42A1.pdf>. Subsequently, the FCC adopted a Second Report and Order on September 29, 2020, that further implemented STIR/SHAKEN and protected consumers against malicious caller ID spoofing. *See* Second Report and Order: Federal Communications Commission, Second Report and Order, FCC 20-136A1 (Sept. 29, 2020), available at <https://docs.fcc.gov/public/attachments/FCC-20-136A1.pdf>. *See* FCC, *TRACED Act Implementation*, (May 1, 2023), available at <https://www.fcc.gov/TRACEDAct>. While many of the voice-service providers, including Verizon Wireless sought exemptions to implement STIR/SHAKEN, all major carriers eventually complied with the STIR/SHAKEN caller ID authentication standards, in accordance with the FCC's June 30, 2021 deadline. *See* Will Wiquist, *STIR/SHAKEN Broadly Implemented Starting Today*, FCC (June 30, 2021), available at <https://docs.fcc.gov/public/attachments/DOC-373714A1.pdf>.

6. Defendants have used and continue to use Dr. Jakobsson's patented inventions, including to implement STIR/SHAKEN on their networks, resulting in the infringement of the Patents-in-Suit.

THE PARTIES

7. Plaintiff RightQuestion, LLC is a California limited liability company having its principal place of business at 250 Oak Grove Avenue, Number 202, Menlo Park, California 94025.

8. Defendant Verizon Communications Inc. ("Verizon Communications") is a Delaware corporation with a principal place of business at 1095 Avenue of the Americas, New York, New York 10036.

9. Defendant Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”) is a partnership organized and existing under the laws of Delaware. Verizon Wireless is identified by the Texas Secretary of State as having an active right to transact business in Texas under Texas taxpayer number 12233728893. Verizon Wireless is a principal subsidiary of Verizon Communications.

10. Defendant Verizon Business Network Services LLC (“Verizon Business Network”) is a limited liability company organized and existing under the laws of the State of Delaware, with a principal place of business at 22001 Loudoun County Parkway, Ashburn, Virginia 20147. Verizon Business Network is identified by the Texas Secretary of State as having an active right to transact business in Texas under Texas taxpayer number 11327458920 and Secretary of State filing number 0003395106. Verizon Business Network may also be served through its registered agent for service, CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Verizon Business Network is a principal subsidiary of Verizon Communications.

11. Defendant Verizon Corporate Services Group Inc. (“Verizon Corporate Services”) is a corporation organized and existing under the laws of the State of New York, with a principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. Verizon Corporate Services is identified by the Texas Secretary of State as having an active right to transact business in Texas under Texas taxpayer number 11316755229 and Secretary of State filing number 0004708906. Verizon Corporate Services may also be served through its registered agent for service, CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. Verizon Corporate Services is a subsidiary of Verizon Communications.

12. Defendant TracFone Wireless, Inc. (“TracFone”) is a corporation organized and

existing under the laws of the State of Delaware, with a principal place of business at 9700 Northwest 112th Avenue, Miami, Florida 33178. Tracfone is identified by the Texas Secretary of State as having an active right to transact business in Texas under Texas taxpayer number 16506557533. TracFone may also be served through its registered agent for service, CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. TracFone is a subsidiary of Verizon Communications.

13. Verizon is doing business, either directly or acting through its agents or agent subsidiaries, on an ongoing basis in this judicial district and elsewhere in the United States, and has a regular and established place of business in this judicial district. Verizon Communications, Cellco Partnership, Verizon Business Network, and TracFone can be served with process through their registered agent, The Corporation Trust Center, 1209 Orange Street, City of Wilmington, County of New Castle, Delaware 19808. Verizon Corporate Services can be served with process through its registered agent, CT Corporation System, 28 Liberty Street, New York, New York 10005.

JURISDICTION AND VENUE

14. RightQuestion realleges the foregoing paragraphs as if fully set forth herein.

15. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*

16. Each Defendant is subject to this Court's personal jurisdiction consistent with the principles of due process and/or the Texas Long Arm Statute.

17. Personal jurisdiction exists generally over the Defendants because each Defendant has sufficient minimum contacts and/or has engaged in continuous and systematic activities in the forum as a result of business conducted within Texas, including in the Eastern District of Texas.

Personal jurisdiction also exists over each Defendant because each, directly or through subsidiaries, makes, uses, sells, offers for sale, imports, advertises, makes available, and/or markets products and/or services within Texas, including in the Eastern District of Texas, that infringe one or more claims of the Patents-in-Suit. Further, Defendants have placed or contributed to placing infringing products and/or services into the stream of commerce knowing or understanding that such products and/or services would be sold and used in the United States, including in this District. Verizon is registered to do business in the State of Texas.

18. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. § 1400(b), including but not limited to because Verizon has committed acts of infringement in this District and has a regular and established place of business in this District.

19. Verizon has committed infringing acts in this judicial district by making, using, offering for sale, selling, and/or importing products or services that infringe the Patents-in-Suit, or by inducing others to infringe the Asserted Patents or by contributorily infringing the Patents-in-Suit. On information and belief, Verizon maintains a “regular and established” place of business in this district, including by (a) maintaining or controlling retail stores in this District, (b) maintaining and operating infringing base stations in this District, including on cellular towers and other installation sites owned or leased by them, and (c) maintaining and operating other places of business in this District, including those where research, development, or sales are conducted, where customer service is provided, or where repairs are made. Verizon operates one or more telecommunications networks, doing business under the brand names “Verizon” and “TracFone” (collectively, the “Verizon Networks”). The Verizon Networks include network infrastructure, and provide wireless, cellular, and other voice-service coverage throughout the United States, including within the Eastern District of Texas.

20. Verizon has a regular and established physical presence in the District, including but not limited to, ownership of or control over property, inventory, or infrastructure. Verizon's website (<https://www.verizon.com/stores/>) displays information for retail stores located at 1111 E Grand Avenue, Marshall, Texas 75670; 1006 E End Blvd. N, Marshall, Texas 75670; 500 E Loop 281, Longview, Texas 75605; and 301 W Loop 281, Longview Texas 75605 (among others), all of which lie within this federal judicial district. Additionally, Total by Verizon's website (<https://www.totalbyverizon.com/stores/>) displays information for a retail store located at 2765 Washington Boulevard, Beaumont, Texas 77705 (among others), which lies within this District.

21. Upon information and belief, Verizon also has offices, including offices for its network technology and planning group, within this District, including, for example, an office in Plano, Texas.

22. In other recent actions, Verizon has either admitted or not contested that this District is a proper venue for patent infringement actions against it. *See, e.g., XR Communications LLC d/b/a Vivato Technologies v. Verizon Communications Inc.*, No. 2:23-cv-00470, Verizon's Answer and Defenses, Dkt. 16 ¶ 23 (E.D. Tex. Dec. 11, 2023).

23. Verizon derives benefits from its presence in this District, including, but not limited to, sales revenue and serving customers using its mobile network in this District. For example, Verizon receives revenue from its corporate stores in this District, by selling network access, phones/products, and services, and by receiving payment for network access, phones/products, and services.

24. Defendants are properly joined under 35 U.S.C. § 299(a) because, on information and belief, Defendants commonly and/or jointly make, use, sell, offer to sell, and/or import the Verizon Networks and their components such that at least one right to relief is asserted against

Defendants jointly, severally, and in the alternative with respect to or arising out of the same transaction, occurrence, or series of transactions or occurrences relating to the making, using, selling, offering to sell, and/or importing into the United States of the same Verizon Networks and their components, and such that questions of fact common to all Defendants will arise in this action.

THE PATENTS-IN-SUIT

U.S. Patent No. 10,674,009

25. The '009 patent was duly and legally issued on June 2, 2020, and is entitled "Validating Automatic Number Identification Data."

26. RightQuestion is the owner of the entire right, title, and interest to the '009 patent by assignment and has the sole right to sue and recover damages for any current, past, or future infringement.

27. The '009 patent is valid and enforceable.

U.S. Patent No. 11,005,989

28. The '989 patent was duly and legally issued on May 11, 2021, and is entitled "Validating Automatic Number Identification Data."

29. RightQuestion is the owner of the entire right, title, and interest to the '989 patent by assignment and has the sole right to sue and recover damages for any current, past, or future infringement.

30. The '989 patent is valid and enforceable.

U.S. Patent No. 11,856,132

31. The '132 patent was duly and legally issued on December 26, 2023, and is entitled "Validating Automatic Number Identification Data."

32. RightQuestion is the owner of the entire right, title, and interest to the '132 patent by assignment and has the sole right to sue and recover damages for any current, past, or future

infringement.

33. The '132 patent is valid and enforceable.

COUNT I

Infringement of U.S. Patent No. 10,674,009

34. RightQuestion realleges the foregoing paragraphs as if fully set forth herein.

35. Verizon has infringed and continue to infringe one or more claims of the '009 patent, literally and/or under the doctrine of equivalents, under 35 U.S.C. § 271(a) *et seq.* by making, using, selling, offering for sale, or importing into the U.S. the Verizon Networks and their components, which support security services, for example, the STIR/SHAKEN protocol and/or Call Protect.

36. At least by December 3, 2020, Verizon had implemented and supported STIR/SHAKEN on the Verizon Networks. As part of this implementation and support of STIR/SHAKEN, Verizon has worked with other voice-service providers to ensure that STIR/SHAKEN technology works across different providers' networks. *See* Kate Jay, *Verizon continues to lead industry in fight against robocalls*, Verizon (Dec. 3, 2020), <https://www.verizon.com/about/news/verizon-fight-against-robocalls> (hereinafter "Verizon Fight Against Robocalls"); Kate Jay, *Verizon works with wireless carriers in US to combat robocalls*, Verizon (Mar. 17, 2021), <https://www.verizon.com/about/news/verizon-carriers-combat-robocalls> (hereinafter "Verizon Collaboration Against Robocalls").

37. Exhibit 4 is an exemplary claim chart, demonstrating on an element-by-element basis, how the Verizon Networks' implementation of STIR/SHAKEN infringes claim 1 of the '009 patent.

38. Verizon has known of the '009 patent at least as of the filing date of this Complaint.

39. Verizon has indirectly infringed and continues to indirectly infringe one or more claims of the '009 patent by inducing infringement by others, such as Verizon's customers and end-users and other digital voice-service providers, in this District and elsewhere in the United States, to implement and/or use the STIR/SHAKEN protocol in an infringing manner, in violation of 35 U.S.C. § 271(b). For example, Verizon's customers and end-users and other voice-service providers infringe via their use of the Verizon Networks to access and use the networks of such other providers that support STIR/SHAKEN. Verizon induces such direct infringement through its affirmative acts of making, using, selling, offering to sell, and/or importing the Verizon Networks and their components, and supporting the STIR/SHAKEN protocol over the Verizon Networks. Verizon performs these affirmative acts with knowledge of the '009 patent and with the intent, or willful blindness, that the induced acts directly infringe the '009 patent.

40. Verizon has actual notice of its infringement of the '009 patent by the filing of this Complaint and, Verizon was or is now aware of the '009 or has willfully blinded itself as to the existence of the '009 patent and Verizon's infringement thereof.

41. Verizon's infringement of the '009 patent has been willful and egregious.

42. Verizon has also indirectly infringed and continues to indirectly infringe the '009 patent by contributing to direct infringement by others, such as Verizon's customers and end-users and other voice-service providers, in this District and elsewhere in the United States, in violation of 35 U.S.C. § 271(c). Verizon's affirmative acts of providing the Verizon Networks to implement and support STIR/SHAKEN in this District and elsewhere in the United States, and causing the STIR/SHAKEN protocol to be used and implemented by Verizon's customers and end-users and other voice-service providers, contribute to their implementation and use of STIR/SHAKEN, such that the '009 patent is directly infringed by Verizon's customers and end-users and such other

voice-service providers. The accused components in the Verizon Networks are material to the inventions claimed in the '009 patent, are not staple articles or commodities of commerce, have no substantial non-infringing uses, and are known by Verizon to be especially made or adapted for use in the infringement of the '009 patent. Verizon performs these acts with knowledge of the '009 patent and with the intent, or willful blindness, that they cause direct infringement of the '009 patent.

43. Verizon does not have any rights to use the '009 patent as alleged in this Complaint.

44. RightQuestion has complied with 35 U.S.C. § 287.

45. RightQuestion's patents, including the '009 patent, are publicly available from the United States Patent Office and other online resources such as Google Patents. *See, e.g.*, Bjorn Markus Jakobsson, *Validating automatic number identification data*, Google Patents (Jun. 2, 2020), available at <https://patents.google.com/patent/US10674009B1/>.

COUNT II

Infringement of U.S. Patent No. 11,005,989

46. RightQuestion realleges the foregoing paragraphs as if fully set forth herein.

47. Verizon has infringed and continue to infringe one or more claims of the '989 patent, literally and/or under the doctrine of equivalents, under 35 U.S.C. § 271(a) *et seq.* by making, using, selling, offering for sale, or importing into the U.S., the Verizon Networks and their components, which support security services, for example, the STIR/SHAKEN protocol and/or Call Protect.

48. At least by December 3, 2020, Verizon had implemented and supported STIR/SHAKEN on the Verizon Networks. As part of this implementation and support of STIR/SHAKEN, Verizon has worked with other voice-service providers to ensure that

STIR/SHAKEN technology works across different providers' networks. See [Verizon Fight Against Robocalls](#); [Verizon Collaboration Against Robocalls](#).

49. Exhibit 5 is an exemplary claim chart, demonstrating on an element-by-element basis, how the Verizon Networks' implementation of STIR/SHAKEN infringes claim 1 of the '989 patent.

50. Verizon has known of the '989 patent at least as of the filing date of this Complaint.

51. Verizon has indirectly infringed and continues to indirectly infringe one or more claims of the '989 patent by inducing infringement by others, such as Verizon's customers and end-users and other digital voice-service providers, in this District and elsewhere in the United States, to implement and/or use the STIR/SHAKEN protocol in an infringing manner, in violation of 35 U.S.C. § 271(b). For example, Verizon's customers and end-users and other voice-service providers infringe via their use of the Verizon Networks to access and use the networks of such other providers that support STIR/SHAKEN. Verizon induces such direct infringement through its affirmative acts of making, using, selling, offering to sell, and/or importing the Verizon Networks and their components, and supporting the STIR/SHAKEN protocol over the Verizon Networks. Verizon performs these affirmative acts with knowledge of the '989 patent and with the intent, or willful blindness, that the induced acts directly infringe the '989 patent.

52. Verizon has actual notice of its infringement of the '989 patent by the filing of this Complaint and, Verizon was or is now aware of the '989 or has willfully blinded itself as to the existence of the '989 patent and Verizon's infringement thereof.

53. Verizon's infringement of the '989 patent has been willful and egregious.

54. Verizon has also indirectly infringed and continues to indirectly infringe the '989 patent by contributing to direct infringement by others, such as Verizon's customers and end-users

and other voice-service providers, in this District and elsewhere in the United States, in violation of 35 U.S.C. § 271(c). Verizon's affirmative acts of providing the Verizon Networks to implement and support STIR/SHAKEN in this District and elsewhere in the United States, and causing the STIR/SHAKEN protocol to be used and implemented by Verizon's customers and end-users and other voice-service providers, contribute to their implementation and use of STIR/SHAKEN, such that the '989 patent is directly infringed by Verizon's customers and end-users and such other voice-service providers. The accused components in the Verizon Networks are material to the inventions claimed in the '989 patent, are not staple articles or commodities of commerce, have no substantial non-infringing uses, and are known by Verizon to be especially made or adapted for use in the infringement of the '989 patent. Verizon performs these acts with knowledge of the '989 patent and with the intent, or willful blindness, that they cause direct infringement of the '989 patent.

55. Verizon does not have any rights to use the '989 patent as alleged in this Complaint.

56. RightQuestion has complied with 35 U.S.C. § 287.

57. RightQuestion's patents, including the '989 patent, are publicly available from the United States Patent Office and other online resources such as Google Patents. *See, e.g.*, Bjorn Markus Jakobsson, *Validating automatic number identification data*, Google Patents (May 11, 2021), available at <https://patents.google.com/patent/US11005989B1/>.

COUNT III

Infringement of U.S. Patent No. 11,856,132

58. RightQuestion realleges the foregoing paragraphs as if fully set forth herein.

59. Verizon has infringed and continue to infringe one or more claims of the '132 patent, literally and/or under the doctrine of equivalents, under 35 U.S.C. § 271(a) *et seq.* by

making, using, selling, offering for sale, or importing into the U.S. the Verizon Networks and their components, which support security services, for example, the STIR/SHAKEN protocol and/or Call Protect.

60. At least by December 3, 2020, Verizon had implemented and supported STIR/SHAKEN on the Verizon Networks. As part of this implementation and support of STIR/SHAKEN, Verizon has worked with other voice-service providers to ensure that STIR/SHAKEN technology works across different providers' networks. See [Verizon Fight Against Robocalls](#); [Verizon Collaboration Against Robocalls](#).

61. Exhibit 6 is an exemplary claim chart, demonstrating on an element-by-element basis, how the Verizon Networks' implementation of STIR/SHAKEN infringes claim 1 of the '132 patent.

62. Verizon has known of the '132 patent at least as of the filing date of this Complaint.

63. Verizon has indirectly infringed and continues to indirectly infringe one or more claims of the '132 patent by inducing infringement by others, such as Verizon's customers and end-users and other voice-service providers, in this District and elsewhere in the United States, to implement and/or use the STIR/SHAKEN protocol in an infringing manner, in violation of 35 U.S.C. § 271(b). For example, Verizon customers and end-users and other voice-service providers infringe via their use of the Verizon Networks to access and use the networks of such other providers that support STIR/SHAKEN. Verizon induces such direct infringement through its affirmative acts of making, using, selling, offering to sell, and/or importing the Verizon Networks and their components and supporting the STIR/SHAKEN protocol over the Verizon Networks. Verizon performs these affirmative acts with knowledge of the '132 patent and with the intent, or willful blindness, that the induced acts directly infringe the '132 patent.

64. Verizon has actual notice of its infringement of the '132 patent by the filing of this Complaint and, Verizon was or is now aware of the '132 or has willfully blinded itself as to the existence of the '132 patent and Verizon's infringement thereof.

65. Verizon's infringement of the '132 patent has been willful and egregious.

66. Verizon has also indirectly infringed and continues to indirectly infringe the '132 patent by contributing to direct infringement by others, such as Verizon's customers and end-users and other voice-service providers, in this District and elsewhere in the United States, in violation of 35 U.S.C. § 271(c). Verizon's affirmative acts of providing the Verizon Networks to implement and support STIR/SHAKEN in this District and elsewhere in the United States, and causing the STIR/SHAKEN protocol to be used and implemented by Verizon's customers and end-users and other voice-service providers, contribute to their implementation and use of STIR/SHAKEN, such that the '132 patent is directly infringed by Verizon's customers and end-users and other voice-service providers. The accused components in the Verizon Networks are material to the inventions claimed in the '132 patent, are not staple articles or commodities of commerce, have no substantial non-infringing uses, and are known by Verizon to be especially made or adapted for use in the infringement of the '132 patent. Verizon performs these acts with knowledge of the '132 patent and with the intent, or willful blindness, that they cause direct infringement of the '132 patent.

67. Verizon does not have any rights to use the '132 patent as alleged in this Complaint.

68. RightQuestion has complied with 35 U.S.C. § 287.

69. RightQuestion's patents, including the '132 patent, are publicly available from the United States Patent Office and other online resources such as Google Patents. *See, e.g.*, Bjorn Markus Jakobsson, *Validating automatic number identification data*, Google Patents (Dec. 26, 2023), available at <https://patents.google.com/patent/US11856132B2>.

PRAYER FOR RELIEF

WHEREFORE, RightQuestion requests the following relief from this Court:

- A. A judgment that each defendant is liable for infringement of one or more claims of the '009, '989, and '132 patents.
- B. Compensatory damages in an amount according to proof, and in any event no less than a reasonable royalty, including all pre-judgment and post-judgment interest at the maximum rate allowed by law and including an accounting of all infringements and/or damages not presented at trial.
- C. An award of enhanced damages.
- D. A declaration that this case is exceptional and an award of reasonable attorneys' fees.
- E. Plaintiff be awarded such other relief as the Court may deem appropriate.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury for all issues so triable.

Dated: February 9, 2024

Respectfully submitted,

/s/ Robert F. Kramer w/ permission Andrea L. Fair

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