

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

RIGHTQUESTION, LLC

*Plaintiff,*

v.

AT&T INC., AT&T CORP., AT&T  
MOBILITY LLC, AT&T MOBILITY II  
LLC, and AT&T SERVICES, INC.,

*Defendants.*

Civil Action No.: 2:24-cv-00094

**JURY TRIAL DEMANDED**

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

Plaintiff RightQuestion, LLC (“RightQuestion”) brings this action for patent infringement against Defendants AT&T Inc., AT&T Corp., AT&T Mobility LLC, AT&T Mobility II LLC, and AT&T Services Inc. (collectively, “AT&T”), 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 AT&T’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 AT&T’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 AT&T and 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 AT&T Inc. is a corporation organized and existing under the laws of Delaware. Since October 2, 1992, AT&T Inc. has been registered to do business in Texas under Texas SOS file number 0009294006. AT&T Inc. may be served through its registered agent, CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

9. Defendant AT&T Corp. is a corporation organized and existing under the laws of New York. Since February 11, 1925, AT&T Corp. has been registered to do business in Texas

under Texas SOS file number 0000480306. AT&T Corp. may be served through its registered agent for service, CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. AT&T Corp. is a direct or indirect subsidiary of AT&T Inc.

10. Defendant AT&T Mobility LLC is a limited liability company organized and existing under the laws of Delaware. As stated on the website of the Texas Secretary of State, AT&T Mobility LLC's Filing Number is 707861123, the Original Date of Filing for AT&T Mobility LLC is November 21, 2000, and CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201 is the registered agent for service for AT&T Mobility LLC. AT&T Mobility LLC is a direct or indirect subsidiary of AT&T Inc.

11. Defendant AT&T Mobility II LLC is a limited liability company organized and existing under the laws of Delaware. As stated on the website of the Texas Office of the Comptroller, AT&T Mobility II LLC's right to transact business in Texas is "ACTIVE," AT&T Mobility II LLC's Texas Taxpayer Number is 18416599704, and AT&T Mobility II LLC's mailing address is 1010 N Saint Marys Street, Room 9-Y01, San Antonio, Texas 78215. Additionally, as stated on the website of the Delaware Department of State, the Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801 is a registered agent for AT&T Mobility II LLC. AT&T Mobility II LLC may also be served through AT&T Mobility LLC's registered agent for service, CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201. AT&T Mobility II LLC is a direct or indirect subsidiary of AT&T Inc.

12. Defendant AT&T Services, Inc. is a corporation organized and existing under the laws of Delaware. As stated on the website of the Texas Secretary of State, AT&T Services, Inc.'s Filing Number is 10935606, the Original Date of Filing is April 5, 1996, and CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201 is the registered agent for service for

AT&T Services, Inc. AT&T Services, Inc. is a direct or indirect subsidiary of AT&T Inc.

### **JURISDICTION AND VENUE**

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

14. 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.*

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

16. 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. Defendants are each registered or authorized to do business in Texas and maintain an agent authorized to receive service of process within Texas.

17. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. § 1400(b), including but not limited to because AT&T has committed acts of infringement in this District and has a regular and established place of business in this District. By way of example and without limitation, AT&T makes, uses, sells, offers to sell, and/or imports products and/or services that are accused of infringing the Patents-In-Suit into and/or within this District and maintains a permanent

and/or continuing presence within this District.

18. For example, AT&T operates one or more telecommunications networks, doing business under the brand names “AT&T” and “Cricket Wireless” (collectively, the “AT&T Networks”). The AT&T Networks include network infrastructure, and provide wireless, cellular, and other voice-service coverage throughout the United States, including within the Eastern District of Texas.

19. AT&T also advertises in the Eastern District of Texas, including but not limited to advertising the geographic coverage of the AT&T Networks within this District. By way of example and without limitation, AT&T's website provides a “Wireless coverage map” that advertises AT&T's current 4G and 5G wireless network coverage in and around Marshall, Texas. *See, e.g.*, <https://www.att.com/maps/wireless-coverage.html> (last visited January 9, 2024).

20. AT&T also operates numerous brick and mortar retail stores in the Eastern District of Texas. These retail stores are physically located within this District, are regular and established places of business of AT&T, and are used by AT&T to actively market and sell services for the AT&T Networks that infringe the Patents-In-Suit. By way of example and without limitation, AT&T's website provides an “AT&T Stores Near You” feature that shows the locations of such AT&T retail stores within this District. *See, e.g.*, <https://www.att.com/stores/> (last visited January 9, 2024).

21. By way of example and without limitation, AT&T maintains brick and mortar retail stores in this District located, among other places, in Marshall (*e.g.*, 1712 E Grand Avenue, Marshall, Texas 75670) and Longview (*e.g.*, 3407 N 4th Street, Suite 107, Longview, Texas 75605; 109 W Loop 281, Longview, Texas 75605; and 2306 Gilmer Road, Longview, Texas 75604). *See, e.g.*, <https://www.att.com/stores/>.

22. AT&T also maintains a regular and established place of business in this District located at 2900 W Plano Parkway, Plano, Texas 75075, which it calls the “AT&T Foundry.” *See, e.g.,* AT&T, *AT&T Foundry Launches Innovation Space for Vertical Industries*, (Sept. 20, 2018), available at [https://about.att.com/story/2018/plano\\_foundry.html](https://about.att.com/story/2018/plano_foundry.html) (last visited January 9, 2024).

23. AT&T also maintains a regular and established place of business in this District that it calls the “AT&T 5G Innovation Studio,” which is also located in Plano, Texas. *See, e.g.,* AT&T, *AT&T Debuts the 5G Innovation Studio*, available at [https://about.att.com/pages/5g\\_innovation\\_studio.html](https://about.att.com/pages/5g_innovation_studio.html) (last visited January 9, 2024). On information and belief, AT&T uses the AT&T 5G Innovation Studio to design, test, use, promote, and sell services for the AT&T Networks that infringe the Patents-In-Suit.

24. AT&T has numerous employees who work in Texas, including within the Eastern District of Texas. In addition to its many retail stores in Texas and in this District, AT&T also has its corporate headquarters located in Dallas, Texas. *See, e.g.,* Kristine Titus, *Get a Peek Inside AT&T's Headquarters in Dallas*, AT&T, available at <https://life.att.jobs/get-a-peek-inside-atts-headquarters-in-dallas-article/> (last visited January 9, 2024).

25. AT&T has solicited business in the Eastern District of Texas, has transacted business within this District, and has attempted to derive financial benefit from the residents of this District, including benefits directly related to AT&T's infringement of the Patents-In-Suit.

26. In other recent actions, AT&T has either admitted or not contested that the Eastern District of Texas is a proper venue for patent infringement actions against it. *See, e.g., ASUS Technology Licensing Inc. v. AT&T Corp.*, No. 2:23-cv-00486, Dkt. 19 ¶ 13 (E.D. Tex. December 26, 2023) (“To the extent a response is required, AT&T does not contest that venue is proper in this district for purposes of this litigation only.”); *Daingean Technologies LTC. v. AT&T Inc.*, No.

2:23-cv-00123, Dkt. 22 ¶ 24 (E.D. Tex. June 1, 2023); *Wireless Alliance, LLC v. AT&T Mobility LLC*, No. 2:23-cv-00095, Dkt. 11 ¶¶ 9-10 (E.D. Tex. May 26, 2023).

27. 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 AT&T 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 AT&T Networks and their components, and such that questions of fact common to all Defendants will arise in this action.

#### **PATENTS-IN-SUIT**

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

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

29. 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.

30. The '009 patent is valid and enforceable.

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

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

32. 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.



33. The '989 patent is valid and enforceable.

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

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

35. 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.

36. The '132 patent is valid and enforceable.

## COUNT I

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

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

38. AT&T 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 AT&T Networks and their components, which support security services, for example, the STIR/SHAKEN protocol and/or Call Protect.

39. At least by August 14, 2019, AT&T had implemented and supported STIR/SHAKEN on the AT&T Networks. As part of this implementation and support of STIR/SHAKEN, AT&T has worked with other voice-service providers to ensure that STIR/SHAKEN technology works across different providers' networks. AT&T, *AT&T, T-Mobile Deliver Cross-Network Call Authentication Technology*, (Aug. 14, 2019), available at [https://about.att.com/story/2019/att\\_tmo\\_call-authentication.html](https://about.att.com/story/2019/att_tmo_call-authentication.html) (hereinafter “AT&T and T-Mobile Call Authentication Article”).

40. Exhibit 4 is an exemplary claim chart, demonstrating on an element-by-element basis, how the AT&T Networks' implementation of STIR/SHAKEN infringes claim 1 of the '009 patent.

41. AT&T has known of the '009 patent at least as of the filing date of this Complaint.

42. AT&T has indirectly infringed and continues to indirectly infringe one or more claims of the '009 patent by inducing infringement by others, such as AT&T'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, AT&T's customers and end-users and other voice-service providers infringe via their use of the AT&T Networks to access and use the networks of such other providers that support STIR/SHAKEN. AT&T induces such direct infringement through its affirmative acts of making, using, selling, offering to sell, and/or importing the AT&T Networks and their components and supporting the STIR/SHAKEN protocol over the AT&T Networks. AT&T 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.

43. AT&T has actual notice of its infringement of the '009 patent by the filing of this Complaint and, AT&T was or is now aware of the '009 or has willfully blinded itself as to the existence of the '009 patent and AT&T's infringement thereof.

44. AT&T's infringement of the '009 patent has been willful and egregious.

45. AT&T has also indirectly infringed and continues to indirectly infringe the '009 patent by contributing to direct infringement by others, such as AT&T'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). AT&T's affirmative acts of providing the AT&T 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 AT&T'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 AT&T's customers and end-users and such other voice-service providers. The accused components in the AT&T 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 AT&T to be especially made or adapted for use in the infringement of the '009 patent. AT&T 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.

46. AT&T does not have any rights to use the '009 patent as alleged in this Complaint.

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

48. 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*

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

50. AT&T 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 AT&T Networks and their components, which support security services, for example, the STIR/SHAKEN protocol and/or Call Protect.

51. At least by August 14, 2019, AT&T had implemented and supported STIR/SHAKEN on the AT&T Networks. As part of this implementation and support of STIR/SHAKEN, AT&T has worked with other voice-service providers to ensure that STIR/SHAKEN technology works across different providers' networks. [AT&T and T-Mobile Call Authentication Article](#).

52. Exhibit 5 is an exemplary claim chart, demonstrating on an element-by-element basis, how the AT&T Networks' implementation of STIR/SHAKEN infringes claim 1 of the '989 patent.

53. AT&T has known of the '989 patent at least as of the filing date of this Complaint.

54. AT&T has indirectly infringed and continues to indirectly infringe one or more claims of the '989 patent by inducing infringement by others, such as AT&T'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, AT&T's customers and end-users and other voice-service providers infringe via their use of the AT&T Networks to access and use the networks of such other providers that support STIR/SHAKEN. AT&T induces such direct infringement through its affirmative acts of making, using, selling, offering to sell, and/or importing the AT&T Networks and their components and supporting the STIR/SHAKEN protocol over the AT&T Networks. AT&T 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.

55. AT&T has actual notice of its infringement of the '989 patent by the filing of this Complaint and, AT&T was or is now aware of the '989 or has willfully blinded itself as to the existence of the '989 patent and AT&T's infringement thereof.

56. AT&T's infringement of the '989 patent has been willful and egregious.

57. AT&T has also indirectly infringed and continues to indirectly infringe the '989 patent by contributing to direct infringement by others, such as AT&T'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). AT&T's affirmative acts of providing the AT&T 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 AT&T'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 AT&T's customers and end-users and other voice-service providers. The accused components in the AT&T 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 AT&T to be especially made or adapted for use in the infringement of the '989 patent. AT&T 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.

58. AT&T does not have any rights to use the '989 patent as alleged in this Complaint.

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

60. 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 Jacobsson, *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*

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

62. AT&T 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 AT&T Networks and their components, which support security services, for example, the STIR/SHAKEN protocol and/or Call Protect.

63. At least by August 14, 2019, AT&T had implemented and supported STIR/SHAKEN on the AT&T Networks. As part of this implementation and support of STIR/SHAKEN, AT&T has worked with other voice-service providers to ensure that STIR/SHAKEN technology works across different providers' networks. [AT&T and T-Mobile Call Authentication Article](#).

64. Exhibit 6 is an exemplary claim chart, demonstrating on an element-by-element basis, how the AT&T Networks' implementation of STIR/SHAKEN infringes claim 1 of the '132 patent.

65. AT&T has known of the '132 patent at least as of the filing date of this Complaint.

66. AT&T has indirectly infringed and continues to indirectly infringe one or more claims of the '132 patent by inducing infringement by others, such as AT&T'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, AT&T's customers and end-users and other voice-service providers infringe via their use of the AT&T Networks to access and use the networks of such other providers that support STIR/SHAKEN. AT&T induces such direct infringement through its affirmative acts of making, using, selling, offering to sell, and/or importing the AT&T Networks and their components and supporting the STIR/SHAKEN protocol over the AT&T Networks. AT&T

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.

67. AT&T has actual notice of its infringement of the '132 patent by the filing of this Complaint and, AT&T was or is now aware of the '132 or has willfully blinded itself as to the existence of the '132 patent and AT&T's infringement thereof.

68. AT&T's infringement of the '132 patent has been willful and egregious.

69. AT&T has also indirectly infringed and continues to indirectly infringe the '132 patent by contributing to direct infringement by others, such as AT&T'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). AT&T's affirmative acts of providing the AT&T 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 AT&T'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 AT&T's customers and end-users and other voice-service providers. The accused components in the AT&T 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 AT&T to be especially made or adapted for use in the infringement of the '132 patent. AT&T 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.

70. AT&T does not have any rights to use the '132 patent as alleged in this Complaint.

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

72. 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 Jacobsson, *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. A judgement that each defendant's infringement has been and is willful.
- C. 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.
- D. An award of enhanced damages.
- E. A declaration that this case is exceptional and an award of reasonable attorneys' fees.
- F. 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 12, 2024

Respectfully submitted,

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

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