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16 Attorneys for Estech Systems IP, LLC

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 ESTECH SYSTEMS IP, LLC,

21 Plaintiff,

22 v.

23 DIALPAD, INC.,

24 Defendant.

25 CASE NO. 3:24-cv-02524

26 **COMPLAINT**

27 DEMAND FOR JURY TRIAL

28 Plaintiff Estech Systems IP, LLC (“Estech”) files this original complaint against Dialpad, Inc. (“Dialpad”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

29 **PARTIES**

30 1. Estech Systems IP, LLC is a Texas corporation, with its principal place of business at 3701 East Plano Parkway, Suite 300, Plano, Texas 75074.

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1 9. Since 1987, ESI has sold more than 400,000 solutions to its customers, working
2 with more than 1,500 certified partners nationwide. Its customers include small and large
3 businesses across the country.

4 10. Recognizing that business doesn't get done without communication, ESI provides
5 powerful products that are easy and simple to use. ESI's products are engineered to make
6 intelligent technology that is intuitive and user-friendly, empowers employee productivity, and
7 fuels customer satisfaction.

8 11. ESI's technology is American-engineered. From its Plano, Texas headquarters,
9 ESI provides a full solutions portfolio of modern business phone systems, including Cloud,
10 Hybrid, Pure IP, and SIP dial tone products. Given ESI's end-to-end product offerings, its
11 customers are empowered to choose the product features they need and want.

12 12. ESI's products include the most integrated cloud PBX in the market—the award-
13 winning ESI Cloud PBX; Voice over IP (VoIP) products and systems; and on-premises products.
14 A cloud-based PBX is a sophisticated telephone exchange system that uses a cloud infrastructure
15 to provide communication services, such as telephony services.

16 13. VoIP transmits and receives voice communications over data networks, such as the
17 Internet or private networks, using the Internet Protocol (IP).

18 14. VoIP systems offer several advantages over traditional phone systems including,
19 but not limited to, lower cost and more efficient network management.

20 15. VoIP systems also enable integration of additional communication services.

21 16. ESI cloud-based VoIP products have handled billions of call minutes.

22 17. ESI also provides U.S.-based, best-in-class technical support for its customers.

23 18. The patents-in-suit, U.S. Patent Nos. 8,391,298 (the "'298 Patent"), 7,068,684 (the
24 "'684 Patent"), and 7,123,699 (the "'699 Patent") (collectively, the "Estech Asserted Patents"),
25 are generally directed to systems and methods for providing robust, feature-rich communications
26 systems including, but not limited to, VoIP telephony and additional communication services that
27 can be integrated with a VoIP telephony system.

1 following functionalities: (i) the ability to make VoIP-based voice calls using its VoIP telephony
2 devices; (ii) the ability to store voice mail messages; (iii) the ability to allow access to the voice
3 mail messages using VoIP telephony devices; and (iv) the ability to provide directory services,
4 which include, but are not limited to, for example, providing directory information to a user or
5 VoIP telephony device, including, but not limited to, for example, providing a list of
6 telecommunications extensions through VoIP telephony devices.

7 24. When this Complaint references “Accused Instrumentalities,” it is referring to the
8 telecommunications and information handling systems Dialpad offers to sell, sells, and makes for
9 its customers as well as the systems its employees use that are referenced in paragraphs 21-23
10 above and are incorporated herein by reference.

11 **COUNT I**

12 **INFRINGEMENT OF U.S. PATENT NO. 8,391,298**

13 25. Estech repeats and re-alleges the allegations in paragraphs 1-24 as though fully set
14 forth in their entirety.

15 26. Estech owns all substantial rights, interest, and title in and to the '298 Patent,
16 including the sole and exclusive right to prosecute this action and enforce the '298 Patent against
17 infringers, and to collect damages for all relevant times. The United States Patent and Trademark
18 Office duly issued the '298 Patent on March 5, 2013. A copy of the '298 Patent is attached as
19 Exhibit A.

20 27. The '298 Patent is titled “Phone Directory in a Voice Over IP Telephone System.”
21 The '298 Patent describes information processing systems that store a list of phone numbers,
22 integrated with a VoIP telephony system, to provide those phone numbers to the user of a VoIP
23 telephone. The user can use that list to dial the telephone number of another user associated with
24 the VoIP telephony system.

25 28. The claims of the '298 Patent are not directed to an abstract idea. For example,
26 claim 13 of the '298 Patent recites a specific arrangement of devices and networking components.
27 Together those devices and networking components enable a user of a first telecommunications

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