IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

ESTECH SYSTEMS, INC.,

Plaintiff,

v.

CIVIL ACTION NO. 6:20-cv-00322 JURY TRIAL DEMANDED

REGIONS FINANCIAL CORPORATION, Defendant.

PLAINTIFF ESTECH SYSTEMS, INC.'S RESPONSIVE CLAIM CONSTRUCTION BRIEF



TABLE OF CONTENTS

I.	INTROD	UCTION
II.	ASSERTI	ED PATENTS1
	A.	The '684 Patent
	В.	The '699 Patent
	C.	The '298 Patent
III	. CLAIM C	CONSTRUCTION ARGUMENT5
	A.	Terms of the '684 Patent5
		1. "A Data Server Coupled to the Hub"
		2. "Sufficiently Throttling the Data Sent from the Workstation to the Telephone to Increase a Rate of Transfer of the Audio Information During the Communicating Step"
		3. "Reducing a Future Amount of Data from Being Transferred from the Workstation if the Amount of Data Exceeds a Predetermined Threshold" 12
	B.	Terms of the '699 Patent
		1. "Coupling a Second LAN to the First LAN over a WAN"
		"Coupling an Audio Path Over the Channel Between the Telecommunications Device and the Voice Mail Box"
		3. "In Response to an Input at the Telecommunications Device, Sending a User Mail Box Connection Message from the Second LAN to the First LAN Requesting a Channel"
	C.	Terms of the '298 Patent
		1. "A First Local Area Network ("LAN") / "A Second LAN" / "A Wide Area Network" ("WAN") / "A Third LAN"
		2. "wherein the list of the plurality of telecommunications extensions is stored in a server in the second LAN, and is accessed by the first circuitry across the WAN"



	3. "select between observing the list of the plurality of telecommunications extensions coupled to the second LAN or observing a list of the plurality of telecommunications extensions coupled to the third LAN"
	4. "Circuitry for automatically calling one of the plurality of telecommunications extensions in response to the user selecting one of the plurality of telecommunications extensions from the observed list, wherein the list of the plurality of telecommunicatons extensions is stored in a server in the second LAN, and is accessed by the first circuitry across the WAN"
V CONCLUS	SION

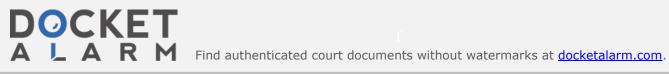


TABLE OF AUTHORITIES

Cases

Adams Respiratory Therapeutics, Inc. v. Perrigo Co., 616 F.3d 1283 (Fed. Cir. 2010)	. 15
Apex Inc. v. Raritan Comput., Inc., 325 F.3d 1364 (Fed. Cir. 2003)	, 26
Blue Calypso, LLC v. Groupon, Inc., 815 F.3d 1331 (Fed. Cir. 2016)	. 12
Capital Mach. Co. v. Miller Veneers, Inc., 524 Fed. Appx. 644, 2013 WL 1501579 (Fed. Cir. 2013)	, 14
Dayco Prods., Inc. v. Total Containment, Inc., 258 F.3d 1317 (Fed. Cir. 2001)	. 21
Epistar Corp. v. ITC, 566 F.3d 1321 (Fed. Cir. 2009)	. 18
Function Media, L.L.C. v. Google, Inc. 708, F.3d 1310 (Fed. Cir. 2013)	. 26
GSK Techs. Inc. v. Eaton Elec. Inc., No. 6:07-cv-16, 2008 U.S. Dist. LEXIS 26232 (E.D. Tex. Apr. 1, 2008)	5
Linear Tech. Corp. v. Impala Linear Corp., 379 F.3d 1311 (Fed. Cir. 2004)	. 26
Media Rights Techs., Inc. v. Capital One Fin. Corp., 800 F.3d 1366 (Fed. Cir. 2015)	, 27
Micro Chem., Inc. v. Great Plains Chem. Co., 194 F.3d 1250 (Fed. Cir. 1999)	. 28
MIT v. Abacus Software, 462 F.3d 1344 (Fed. Cir. 2006)	. 26
NTP, Inc. v. Research in Motion, Ltd., 418 F.3d 1282 (Fed. Cir. 2005)	, 14
Orion Energy Sys. V. Energy Bank Inc., No. 16-C-1250, 2017 U.S. Dist. LEXIS 174665 (E.D. Wis. Oct. 23, 2017)	6
Parthenon Unified Memory Architecture LLC v. ZTE Corn.	



Case 6:20-cv-00322-ADA Document 52 Filed 12/09/20 Page 5 of 35

No. 2:15-cv-00225-JRG-RSP, 2016 U.S. Dist. LEXIS 8038 (E.D. Tex. Jan. 25, 2016)
Phenix Longhorn, LLC v. Wistron Corp., No. 2:17-cv-00711-RWS, 2019 U.S. Dist. LEXIS 103786 (E.D. Tex. June 21, 2019) 25, 26
Randall May Int'l, Inc. v. DEG Music Prods., Inc., 378 F. App'x 989 (Fed. Cir. 2010)
Thorner v. Sony Comput. Entm't Am. LLC, 669 F.3d 1362 (Fed. Cir. 2012)
Williamson v. Citrix Online, LLC, 792 F.3d 1339 (Fed. Cir. 2015)
Statutes
35 U.S.C. § 112



DOCKET A L A R M

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

