

IPR2021-00574
Patent 8,391,298

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RINGCENTRAL, INC.,

Petitioner,

v.

ESTECH SYSTEMS, INC.,

Patent Owner

***Inter Partes* Review No. IPR2021-00574**

Patent No. 8,391,298

JOINT STATEMENT REGARDING PRIOR ART

Estech Systems, Inc. (“Estech” or “Patent Owner”) and RingCentral, Inc. (“RingCentral” or “Petitioner”) hereby submit this joint statement regarding the extent to which the prior art cited in the Petition in this proceeding will be relied on in the parallel litigations in the Eastern and Western Districts of Texas. *See* Paper 9, p. 4.

The prior art asserted in the Petition does not overlap with the prior art at issue in the Eastern District of Texas Litigation.¹

In the Western District of Texas Litigation,² the same primary reference (U.S. Patent No. 6,240,558 to Chang) used in both Grounds of the Petition is currently asserted. Petitioner is not a party to any of the pending litigations. But, if *inter partes* review is granted, Petitioner represents that no Real Party-in-Interest with respect to the above proceeding will rely upon the Grounds or prior art presented in the Petition in the Western District of Texas Litigation. Thus, there would be no overlap between this proceeding and the Western District of Texas Litigation.

¹ *Estech Systems, Inc. v. Target Corporation, et al.*, No. 2:20-cv-00123-JRG-RSP (E.D. Tex.).

² *Estech Systems, Inc. v. Howard Midstream Energy Partners, LLC*, No. 6:20-cv-777-ADA (W.D. Tex.).

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Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on September 10, 2021, the foregoing document was served on counsel of record for Petitioner by filing this document through the End-to-End System, as well as via electronic mail to counsel of record for Petitioner at the following addresses:

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