

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

COBBLESTONE WIRELESS, LLC,

Plaintiff,

v.

AT&T INC.; AT&T SERVICES INC.; AT&T
MOBILITY LLC; AND AT&T CORP.;

Defendants.

Case No. 2:22-cv-00474

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Cobblestone Wireless, LLC (“Cobblestone”) files this complaint against Defendants AT&T Inc., AT&T Services Inc., AT&T Mobility LLC, and AT&T Corp. (collectively, “Defendants” or “AT&T”) alleging infringement of U.S. Patent Nos. 8,891,347 (the “’347 patent”), 9,094,888 (the “’888 patent”), 10,368,361 (the “’361 patent”), and 8,554,196 (the “’196 patent”) (collectively, the “Patents-in-Suit” or “Asserted Patents”).

Plaintiff Cobblestone and the Patents-in-Suit

1. Plaintiff Cobblestone Wireless, LLC is a limited liability company organized under the laws of the State of Texas, with an address at 101 E. Park Blvd., Suite 600, Plano, Texas 75074.
2. Cobblestone is the owner of U.S. Patent No. 8,891,347 entitled “User-Focusing Technique for Wireless Communication Systems,” which issued November 18, 2014. A copy of the ’347 patent is attached to this complaint as Exhibit 1.
3. Cobblestone is the owner of U.S. Patent No. 9,094,888 entitled “Wireless Device Handoff Between Wireless Networks,” which issued July 28, 2015. A copy of the ’888 patent is attached to this complaint as Exhibit 2.

4. Cobblestone is the owner of U.S. Patent No. 10,368,361 entitled “Adaptive Communication Resource Allocation in a Wireless Network,” which issued July 30, 2019. A copy of the ’361 patent is attached to this complaint as Exhibit 3.

5. Cobblestone is the owner of U.S. Patent No. 8,554,196 entitled “Network Coverage By Cycling Through Beam Shape Coverage Configurations,” which issued October 8, 2013. A copy of the ’196 patent is attached to this complaint as Exhibit 4.

6. On information and belief, Defendant AT&T Inc. is a corporation organized under the laws of the State of Delaware, with its principal place of business at 208 S. Akard Street, Dallas, Texas, 75202. AT&T Inc. has as its registered agent for service: CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

7. On information and belief, Defendant AT&T Services, Inc. is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 208 South Akard Street, Dallas, Texas 75202. AT&T Services, Inc. has as its registered agent for service: CT Corporation System, located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

8. On information and belief, Defendant AT&T Mobility LLC is a limited liability company organized and existing under the laws of Delaware, with its principal place of business at 1025 Lenox Park Boulevard NE, Atlanta, Georgia 30319. AT&T Mobility LLC has as its registered agent for service: The Corporation Trust Company, located at Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

9. On information and belief, Defendant AT&T Corp. is a corporation organized and existing under the laws of the State of New York, with a principal place of business at One AT&T Way, Bedminster, New Jersey 07921-0752. AT&T Corp. has as its registered agent for service: C T Corporation System, located at 28 Liberty Street, New York, New York, 10005.

Jurisdiction and Venue

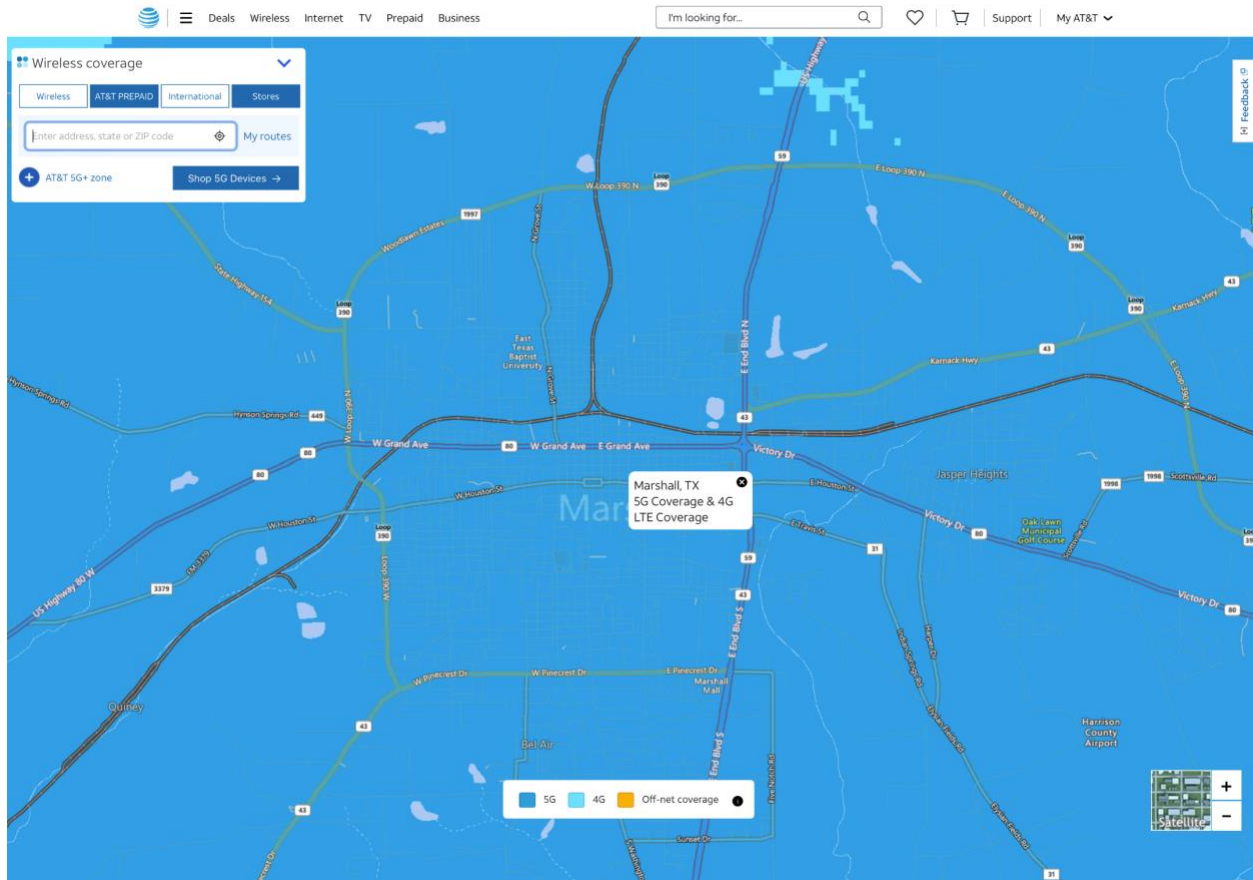
10. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

11. This Court has personal jurisdiction over AT&T in this action because AT&T has committed acts of infringement within this District giving rise to this action, has a regular and established place of business in this District, and has established minimum contacts with this forum such that the exercise of jurisdiction over AT&T would not offend traditional notions of fair play and substantial justice. AT&T, directly and/or through subsidiaries or intermediaries, conducts its business extensively throughout Texas, by shipping, distributing, offering for sale, selling, and advertising its products and/or services in the State of Texas and the Eastern District of Texas, regularly does business or solicits business, engages in other persistent courses of conduct, and/or derives substantial revenue from products and/or services provided to individuals in the State of Texas, and commits acts of infringement of Plaintiff's patents in this District by, among other things, making, using, importing, offering to sell, and selling products and/or services that infringe the asserted patents, including without limitation the tablets and phones accused of infringement in this case and cellular services offered by AT&T on its network.

12. AT&T, directly and/or through subsidiaries or intermediaries, has purposefully and voluntarily placed one or more products and/or services in the stream of commerce that practice the Asserted Patents with the intention and expectation that they will be purchased and used by consumers in the Eastern District of Texas. These products and/or services have been and continue to be purchased and used in the Eastern District of Texas.

13. Venue as to AT&T is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). On information and belief, AT&T resides in this District and/or has committed acts of infringement and has a regular and established place of business in this District.

14. For example, AT&T advertises its wireless networks as available in Texas, including within the Eastern District of Texas. *See e.g.*, <https://www.att.com/maps/wireless-coverage.html>:

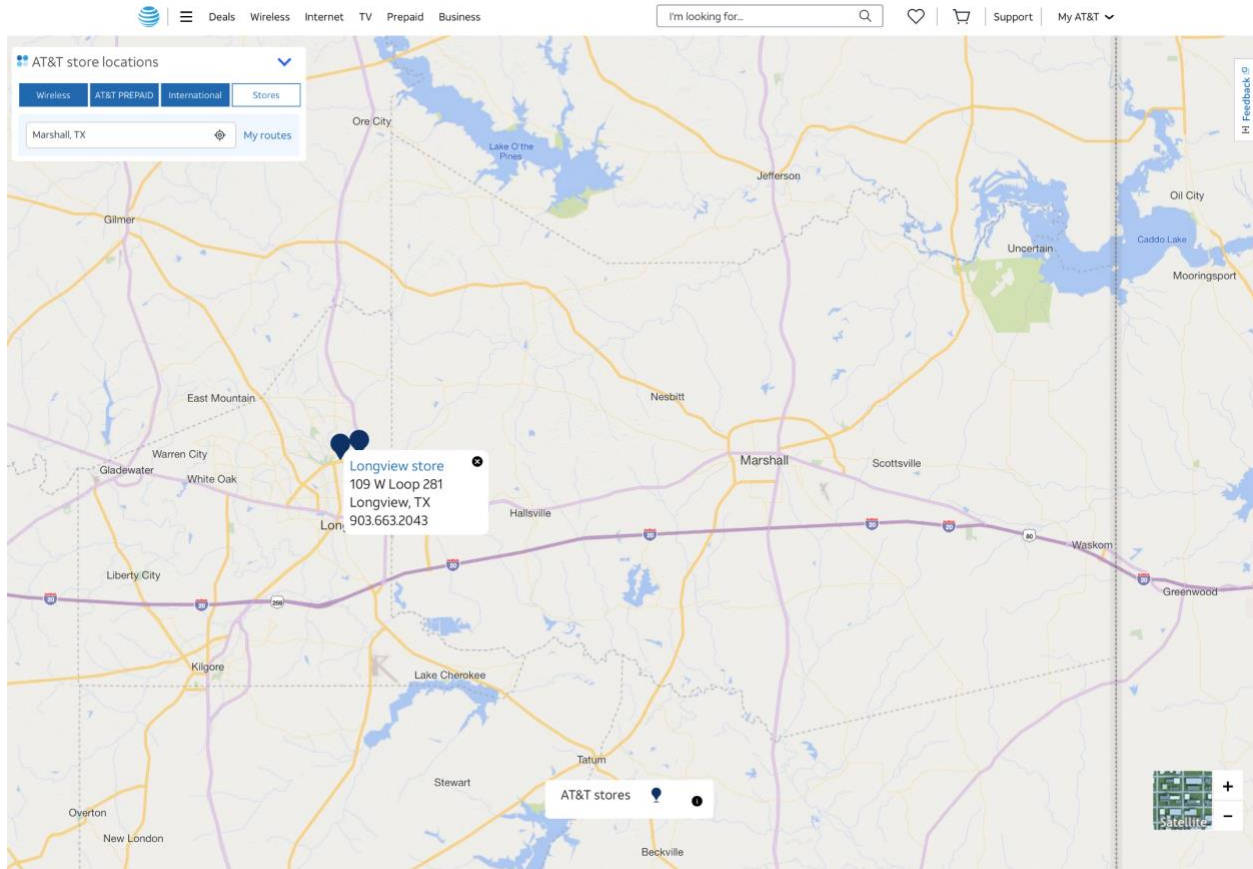


15. AT&T had more than 196 million subscribers as of March 31, 2022.¹

16. For further example, AT&T sells mobile devices accused of infringement in Texas, including within the Eastern District of Texas.²

¹ https://investors.att.com/~media/Files/A/ATT-IR-V2/financial-reports/quarterly-earnings/2022/1Q22/ATT_1Q22_8K.pdf.

² *See, e.g.*, <https://www.att.com/maps/wireless-coverage.html>



17. On information and belief, AT&T owns and operates a foundry at 2900 West Plano Parkway, Plano, Texas 75075.³

Count 1 – Claim for infringement of the '347 patent.

18. Cobblestone incorporates by reference each of the allegations in paragraphs 1–17 above and further alleges as follows:

19. Plaintiff owns by assignment all rights, title, and interest in U.S. Patent No. 8,891,347 (the “’347 Patent”), entitled “User-Focusing Technique for Wireless Communication Systems.” The ’347 Patent was duly and legally issued by the United States Patent and Trademark Office on November 18, 2014. A true and correct copy of the ’347 Patent is attached as Exhibit 1.

³ See e.g., https://about.att.com/story/2018/plano_foundry.html.

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