

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
4

5 TWITTER, Inc.,

6 Plaintiff,

7 v.

8 VOIP-PAL.COM, INC,

9 Defendant.

Case No. 3:21-CV-9773-JD

**SECOND DECLARATION OF LEWIS E.  
HUDNELL, III IN SUPPORT OF  
DEFENDANT VOIP-PAL.COM, INC.'S  
MOTION TO DISMISS**

10  
11 I, Lewis E. Hudnell, III, declare as follows:

12  
13 1. I am an attorney licensed to practice law in the State of California and the State of New  
14 York and admitted to practice in this District.

15  
16 2. I am an attorney at the Hudnell Law Group, P.C., 800 W. El Camino Real, Mountain  
17 View, California 94040 representing Plaintiff VoIP-Pal, Inc. ("VoIP-Pal") in the above-captioned case.

18  
19 3. I have personal knowledge of the facts contained herein and, if called as a witness, I  
20 could and would testify competently thereto. I make this Declaration in Support of VoIP-Pal's  
21 Motion to Dismiss.

22  
23 4. Attached as Exhibit 13 is a true and correct copy of a comparisons of selected claims of  
24 the Mobile Gateway patents and the RBR patents.

25  
26 5. Attached as Exhibit 14 is a true and correct copy of Dkt. No. 90-6 in Case No. 5:20-cv-  
27 2460 (N.D. Cal.).

28  
29 6. Attached as Exhibit 15 is a true and correct copy of Dkt. No. 90-6 in Case No. 5:20-cv-  
30 2995 (N.D. Cal.).

31 7. Attached as Exhibit 16 is a true and correct copy of a Declaration of Lewis E. Hudnell,

1 III from Case No. 5:21-cv-02769 (N.D. Cal.).

2 8. Attached as Exhibit 17 is a true and correct copy of VoIP-Pal's Answer in Case No. 5:21-  
3 cv-02769 (N.D. Cal.).

4 9. Attached as Exhibit 18 is a true and correct copy of Twitter's Complaint in Case No.  
5 5:21-cv-02769 (N.D. Cal.).

6 10. Attached as Exhibit 19 is a true and correct copy of VoIP-Pal's Complaint in Case No.  
7 5:18-cv-04523 (N.D. Cal.).

8 11. Attached as Exhibit 20 are a true and correct copies Notices of Appearance of Lewis E.  
9 Hudnell, III in Case No. 5:18-cv-04523 (N.D. Cal.) and Case No. 5:18-cv-6216 (N.D. Cal.).

10 I declare under penalty of perjury under the laws of the State of California and United States of  
11 America that the foregoing statements are true and correct.

12 Dated this 28<sup>th</sup> day of March, 2022.

13  
14  
15 /s/Lewis E. Hudnell, III  
16 Lewis E. Hudnell, III