

Exhibit 1

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

VOIP-PAL.COM, INC.

Plaintiff,

v.

META PLATFORMS, INC., and
WHATSAPP, INC.

Defendants.

CIVIL ACTION NO. 6:21-cv-665-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

GOOGLE LLC,

Defendant.

CIVIL ACTION NO. 6:21-cv-667-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

AMAZON.COM, INC.;
AMAZON.COM SERVICES LLC; and
AMAZON WEB SERVICES, INC.,

Defendants.

CIVIL ACTION NO. 6:21-cv-668-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.;
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS;
VERIZON SERVICES, CORP.; and
VERIZON BUSINESS NETWORK
SERVICES, INC.,

Defendants.

CIVIL ACTION NO. 6:21-cv-672-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

T-MOBILE US, INC.; and
T-MOBILE USA, INC.

Defendants.

CIVIL ACTION NO. 6:21-cv-674-ADA

PLAINTIFF VOIP-PAL.COM, INC.’S PROPOSED CLAIM CONSTRUCTIONS

Under the parties’ Proposed Scheduling Order (Case No. 6:21-cv-665-ADA, Dkt. No. 30), Plaintiff VoIP-Pal.com, Inc. (“VoIP-Pal”) provides its proposed claim constructions, to the extent that any of these claim terms require construction. These are the terms and phrases among the asserted claims that VoIP-Pal contends might be in need of construction. By listing any given term or phrase, VoIP-Pal does not agree that that term or phrase actually should be construed, only that it might deserve construction. Otherwise, VoIP-Pal presently contends that the claims receive their plain and ordinary meaning as understood by a person having ordinary skill in the art in the field of the invention, in light of the intrinsic record. VoIP-Pal reserves the right to contend that no particular explanatory construction is needed for these or any other terms or phrases. VoIP-Pal specifically reserves the right to submit proposed jury instructions that present no specific explanation of any

given term or phrase, but that ask the jury to apply the plain meaning as understood by a person of ordinary skill. Likewise, VoIP-Pal reserves the right to contend that additional terms or phrases might be in need of construction, such as after review and consideration of Defendants' disclosure. VoIP-Pal also reserves the right to contend that additional terms or phrases identified by Defendants in the related cases might be in need of construction.

To the extent the claim terms, phrases, or clauses set forth in this disclosure include particular terms, phrases, or clauses appropriate to be construed separately, such terms, phrases, or clauses are deemed to be part of this disclosed list. Similarly, to the extent that it is appropriate to construe terms, phrases, or clauses listed in this disclosure in the context of additional claim language, such additional language is deemed to be part of this disclosure.

VoIP-Pal's investigation is ongoing. Accordingly, VoIP-Pal reserves the right to supplement and/or amend its disclosure, including but not limited to identifying additional terms in response to Defendants' disclosure and proposing additional or alternative constructions, as discovery proceeds, and as additional information becomes available.

Term	Proposed Construction	Patent(s)/Claim(s)
"Access server"	Plain and ordinary meaning	'234 patent claims 1, 11, 19, 20, 21, 25, 28 '721 patent claims 1, 16, 20, 34, 38, 39, 46, 49, 50
"Access code request message"	Plain and ordinary meaning	'234 patent claims 1, 10, 11, 19, 20, 21, 28, 40, 46, 62, 72 '721 patent claims 1, 16, 20, 34, 38, 39, 49, 50, 51, 77, 103, 104
"Access code reply message"	Plain and ordinary meaning	'234 patent claims 1, 11, 19, 20, 43, 45, 46, 61, 62, 75 '721 patent claims 1, 16, 20, 34, 38, 46, 49, 50, 51, 77, 103, 124

“routing controller”	One or more devices that produce messages to setup communication between callers and callees	’234 patent claims 10, 19, 32, 62, 64 ’721 patent claims 15, 16, 34, 49, 51, 77, 103, 109, 110, 124
“roaming”	Plain and ordinary meaning	’234 patent, claims 1, 19, 28, 30, 46, 62 ’721 patent, claims 34, 49
“callee identifier”	Plain and ordinary meaning	’234 patent, claims 1, 11, 20, 25, 28, 30, 46, 62
“access code”	Plain and ordinary meaning	’234 patent, claims 1, 10, 11, 19, 20, 21, 25, 28, 30, 31, 32, 33, 38, 40, 43, 45, 46, 47, 48, 54, 61, 62, 64, 65, 70, 72, 75 ’721 patent, claims 1, 14, 16, 20, 34, 38, 39, 46, 49, 50, 51, 57, 63, 77, 103, 104, 109, 110, 124, 130, 135, 138, 139, 140
“pool of access codes”	Plain and ordinary meaning	’234 patent, claims 1, 11, 20, 30, 38, 46, 54, 57, 62, 70 ’721 patent, claims 63, 109
“local call”	Plain and ordinary meaning	’234 patent, claims 1, 11, 20
“receiv[ing] an access code reply message from the access server”	Plain and ordinary meaning	’234 patent, claims 1, 11, 20 ’721 patent, claims 1, 20, 38
“initiat[ing] a call [with the mobile telephone] using said access code to identify the callee”	Plain and ordinary meaning	’234 patent, claims 1, 11, 20
“means for receiving, from a user of the mobile telephone, a callee identifier”	Function: “receiving, from a user of the mobile telephone, a callee identifier” Corresponding structure: Mobile wireless device 12 having a microprocessor 52	’234 patent, claim 11

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