

EXHIBIT 3

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

VOIP-PAL.COM, INC.

Plaintiff,

v.

FACEBOOK, 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 USA, INC.

Defendant.

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

JOINT CLAIM CONSTRUCTION STATEMENT

Under the Scheduling Order (Case No. 6:21-cv-665, Dkt. No. 38), Plaintiff and Defendants submit this Joint Claim Construction Statement with respect to U.S. Patent Nos. 8,630,234 and 10,880,721.

I. AGREED-UPON CLAIM TERMS:

Claim Term	Agreed Construction
“access server” ’234 patent, claims 1, 11, 19-21, 25, 28; ’721 patent, claims 1, 16, 20, 34, 38, 39, 46, 49, 50	Plain and ordinary meaning
“routing controller” ’234 patent, claims 10, 19, 28, 32, 48, 62, 64; ’721 patent, claims 15, 16, 34, 49, 51, 77, 103, 109, 110, 124	Plain and ordinary meaning
“means for receiving, from a user of the mobile telephone, a callee identifier” ’234 patent, claim 11	Governed by 35 U.S.C. § 112, ¶ 6 Function: receiving, from a user of the mobile telephone, a callee identifier Structure: a dialing input, which is a key pad, a voice recognition unit, or a parameter memory with prestored callee identifiers
“means for transmitting an access code request message to an access server” ’234 patent, claim 11; ’721 patent, claim 20	Governed by 35 U.S.C. § 112, ¶ 6 Function: transmitting an access code request message to an access server Structure: a network interface
“means for receiving an access code reply message from the access server in response to [said/the] access code request message” ’234 patent, claim 11; ’721 patent, claim 20	Governed by 35 U.S.C. § 112, ¶ 6 Function: receiving an access code reply message from the access server in response to [said/the] access code request message Structure: a network interface

Claim Term	Agreed Construction
<p>“means for receiving from the mobile telephone [said/an] access code request message”</p> <p>’234 patent, claims 19, 46</p>	<p>Governed by 35 U.S.C. § 112, ¶ 6</p> <p>Function: receiving from the mobile telephone [said/an] access code request message</p> <p>Structure: a network interface</p>
<p>“means for transmitting [said/an/the] access code reply message including [said/the] access code to the [mobile telephone/wireless apparatus]”</p> <p>’234 patent, claims 19, 46; ’721 patent, claims 34, 77</p>	<p>Governed by 35 U.S.C. § 112, ¶ 6</p> <p>Function: transmitting [said/an/the] access code reply message including [said/the] access code to the [mobile telephone/wireless apparatus]</p> <p>Structure: a network interface</p>
<p>“means for receiving from a user of the wireless apparatus a destination node identifier”</p> <p>’721 patent, claim 20</p>	<p>Governed by 35 U.S.C. § 112, ¶ 6</p> <p>Function: receiving from a user of the wireless apparatus a destination node identifier</p> <p>Structure: a dialing input, which is a key pad, a voice recognition unit, or a parameter memory with prestored callee identifiers</p>
<p>“means for receiving from the wireless [apparatus/device] [the/an] access code request message”</p> <p>’721 patent, claims 34, 77</p>	<p>Governed by 35 U.S.C. § 112, ¶ 6</p> <p>Function: receiving from the wireless [apparatus/device] [the/an] access code request message</p> <p>Structure: a network interface</p>

II. DISPUTED CLAIM TERMS:

Claim Term	Plaintiff’s Construction	Defendants’ Construction	Proposing Party
“roaming”	Plain and ordinary meaning ¹	Preamble is limiting.	Defendants

¹ Plaintiff disputes that it has made any assertion about how the plain and ordinary meaning of “roaming” should be construed.

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