

**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. 6:20-cv-267-ADA
VOIP-PAL.COM, INC. Plaintiff, v. GOOGLE, LLC, Defendant.	CIVIL ACTION NO. 6:20-cv-269-ADA
VOIP-PAL.COM, INC. Plaintiff, v. AMAZON.COM, INC.; AMAZON.COM SERVICES LLC; and AMAZON.COM WEB SERVICES, INC.; Defendants.	CIVIL ACTION NO. 6:20-cv-272-ADA

JOINT MOTION TO LIFT STAY AND ENTER SCHEDULING ORDER

The parties in the above-captioned actions jointly move the Court to lift the stay in these actions based on events that have occurred since the parties submitted their Joint Status Report on September 29, 2021. *See, e.g.*, Case No. 6:20-cv-267-ADA, Dkt. No. 49.

As previously reported, VoIP-Pal.com and Verizon stipulated to the dismissal of *Cellco*

Partnership dba Verizon Wireless, v. VoIP-Pal.com Inc., Case No. 5:20-cv-03092-LHK (N.D. Cal.) without prejudice and the case was dismissed on May 26, 2021. Separately, on August 30, 2021, the court in *Twitter, Inc. v. VoIP-Pal.com Inc.*, Case No. 5-20-cv-02397-LHK (N.D. Cal.) granted VoIP-Pal's motion to dismiss and entered judgment closing the case.

After the parties filed the Joint Status Report, on October 13, 2021, VoIP-Pal and AT&T stipulated to the dismissal of *AT&T Corp., et al. v. VoIP-Pal.com Inc.*, Case No. 5:20-cv-02995-LHK (N.D. Cal.) without prejudice. A copy of the stipulation of dismissal is attached as Exhibit A. On October 22, 2021, VoIP-Pal and Apple stipulated to the dismissal of *Apple, Inc. v. VoIP-Pal.com Inc.*, Case No. 5:20-cv-02460-LHK (N.D. Cal.) without prejudice. A copy of the stipulation of dismissal is attached as Exhibit B.

After meeting and conferring, the parties agree that the stay that was put in place in these cases can be lifted. *See, e.g.*, Case No. 6:20-cv-267-ADA, Dkt. No. 38. Accordingly, the parties respectfully request that the Court lift the stay and enter the Proposed Scheduling Order enclosed with this Motion.¹

Dated: November 8, 2021

Respectfully submitted,

By: /s/Lewis E. Hudnell, III
Lewis E. Hudnell, III
lewis@hudnelllaw.com
Nicolas S. Gikkas
nick@gikkaslaw.com
Hudnell Law Group P.C.

¹ As previously indicated (*see* Dkt. 49 at 4 n.2), transfer briefing was not completed in Facebook's or Google's 2020 WDTX cases, and those defendants intend to pursue their prior motions to transfer. However, transfer briefing was completed in Amazon's 2020 WDTX case, although VoIP-Pal has a pending Motion To Strike Portions Of The Amazon Defendants' Reply In Support Of Motion To Transfer Venue Or In The Alternative, Motion For Leave To Conduct Venue Discovery And To File A Surreply (Case No. 6:20-cv-272-ADA, Dkt. No. 43), which is fully briefed.

800 W. El Camino Real Suite 180
Mountain View, California 94040
T: 650.564.3698
F: 347.772.3034

**ATTORNEYS FOR PLAINTIFF
VOIP-PAL.COM, INC.**

/s/draft

Steve McConnico
Texas State Bar No. 13450300
smconnico@scottdoug.com
Paige Arnette Amstutz
Texas State Bar No. 00796136
pamstutz@scottdoug.com
SCOTT, DOUGLASS & McCONNICO, LLP
303 Colorado Street, Suite 2400
Austin, TX 78701
Telephone: (512) 495-6300
Facsimile: (512) 495-6399

Robert W. Unikel (Admitted *Pro Hac Vice*)
robertunikel@paulhastings.com
John A. Cotiguala (Admitted *Pro Hac Vice*)
johncotiguala@paulhastings.com
PAUL HASTINGS LLP
71 South Wacker Drive, 45th Floor
Chicago, IL 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6100

Robert R. Laurenzi (Admitted *Pro Hac Vice*)
robertlaurenzi@paulhastings.com
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090

James V. Razick (Admitted *Pro Hac Vice*)
Jamesrazick@paulhastings.com
PAUL HASTINGS LLP
875 15th Street, N.W.
Washington, DC 20005
Telephone: (202) 551-1700

Facsimile: (202) 551-1705

Ariell N. Bratton (Admitted *Pro Hac Vice*)

ariellbratton@paulhastings.com

PAUL HASTINGS LLP

4747 Executive Drive, 12th Floor

San Diego, CA 92121

Telephone: (858) 458-3000

Facsimile: (858) 458-3005

**ATTORNEYS FOR DEFENDANT
GOOGLE LLC**

/s/draft

Michael E. Jones

State Bar No. 10929400

mikejones@potterminton.com

POTTER MINTON

110 N. College Ave., Suite 500

Tyler, Texas 75702

Tel: (903) 597-8311

Fax: (903) 593-0846 (Facsimile)

Jeanne M. Heffernan (Pro Hac Vice)

jeannie.heffernan@kirkland.com

KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, NY 10022

Tel: (212) 446-4800

Fax: (212) 446-4900

Ellisen Shelton Turner (Pro Hac Vice)

ellisen.turner@kirkland.com

Joshua Popik Glucoft (CA Bar No. 301249)

josh.glucoft@kirkland.com

KIRKLAND & ELLIS LLP

2049 Century Park East, Suite 3700

Los Angeles, CA 90067

Tel: (310) 552-4220

Fax: (310) 552-5900

Kristina R. Cary

Massachusetts BBO No. 688759

kristina.cary@kirkland.com

KIRKLAND & ELLIS LLP

200 Clarendon Street

Boston, MA 02116
Tel: (617) 385-7500
Fax: (617) 385-7501

**ATTORNEYS FOR DEFENDANTS
FACEBOOK, INC. AND WHATSAPP, INC.**

/s/draft

M. Craig Tyler, Bar No. 00794762
Perkins Coie LLP
500 W 2nd St, Suite 1900
Austin, TX 78701-4687
Tel. No. 737.256.6113
Fax No. 737.256.6300

Daniel T. Shvodian, Admitted Pro Hac Vice
James F. Valentine, Admitted Pro Hac Vice
Wing H. Liang, Admitted Pro Hac Vice
Perkins Coie LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Tel. No. 650.838.4300
Fax No. 650.838.4350

**ATTORNEYS FOR DEFENDANTS
AMAZON.COM, INC.; AMAZON.COM,
SERVICES LLC; AND AMAZON WEB
SERVICES, INC.**

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