

**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. 6:20-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 WEB SERVICES, INC.,

Defendants.

CIVIL ACTION NO. 6:20-cv-272-ADA

**JOINT CLAIM CONSTRUCTION STATEMENT**

Under the Scheduling Order (Case No. 6:20-cv-267, Dkt. No. 52), Plaintiff and Defendants submit this Joint Claim Construction Statement with respect to U.S. Patent No. 10,218,606.

**I. AGREED-UPON CLAIM TERMS:**

None.

**II. DISPUTED CLAIM TERMS:**

<b>Claim Term</b>	<b>Plaintiff's Construction</b>	<b>Defendants' Construction</b>	<b>Proposing Party</b>
“network element(s)”  claims 1, 4, 8, 14, 19-21, 23, 24, 27, 32	Plain and ordinary meaning <sup>1</sup>	Indefinite.  This contrasts with Plaintiff's assertion that the plain and ordinary meaning of “network element(s)” is “a device or component of the communication network associated with at least one IP address.”	Defendants
“identifier(s)”  claims 1, 5, 6, 8, 9, 11, 14, 15, 19, 21, 22, 27, 32, 42, 44	Plain and ordinary meaning	“value with pre-defined format”	Defendants
“first participant profile”  claims 1, 3, 19-21, 42, 44	“stored information specific to a subscriber (first participant) of a communication system”	“information relating to a call participant in a PSTN system”	Joint
“routing message”  claims 1, 8, 14, 19, 21, 26, 27, 32	Plain and ordinary meaning	“a message that includes a callee user name field, a route field, and a time to live field”	Defendants

<sup>1</sup> Plaintiff disputes that it has made any assertion about how the plain and ordinary meaning of “network element(s)” should be construed.

<b>Claim Term</b>	<b>Plaintiff's Construction</b>	<b>Defendants' Construction</b>	<b>Proposing Party</b>
“private network” claim 8	“a network for communication that is privately controlled”	Plain and ordinary meaning	Plaintiff
“gateway” claims 14, 26	Plain and ordinary meaning <sup>2</sup>	Plain and ordinary meaning, which is “device that connects networks that use different communication protocols.”  This contrasts with Plaintiff's assertion that the plain and ordinary meaning of “gateway” is “a device that connects at least two networks.”	Defendants

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<sup>2</sup> Plaintiff disputes that it has made any assertion about how the plain and ordinary meaning of “gateway” should be construed.

Dated: May 6, 2022

Respectfully submitted,

*/s/Lewis E. Hudnell, III*

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