

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

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-00272-ADA

**DECLARATION OF DANIEL T. SHVODIAN IN SUPPORT OF  
AMAZON'S OPPOSITION TO VOIP-PAL'S MOTION TO LIFT STAY  
AND RESET *MARKMAN* HEARING DATE**

I, Daniel T. Shvodian, declare:

1. I am counsel for Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc. (“Amazon”) in this case. I submit this Declaration in support of Amazon’s Opposition To VoIP-Pal’s Motion To Lift Stay and Reset *Markman* Hearing Date.

2. Attached as Exhibit A is a true and correct copy of Defendant Google LLC’s Notice and Memorandum of Points and Authorities in Support of Its Motion for Judgment on the Pleadings.

3. Attached as Exhibit B is a true and correct copy of Defendants Meta Platforms Inc. and WhatsApp LLC’s Notice and Memorandum of Points and Authorities in Support of Their Motion for Judgment on the Pleadings.

4. In this litigation, VoIP-Pal has asserted claims 1, 3-6, 8-9, 11, 14-15, 18-24, 26-27, and 44 against Amazon. VoIP-Pal has asserted those same claims against Google, and Google’s motion for judgment on the pleadings addresses each of those claims. (*See, e.g.*, Ex. A at 12, n.3.)

5. Judge Donato of the Northern District of California held a status conference on January 26, 2023 in *VoIP-Pal, Inc. v. Google LLC*, Case No. 3:22-cv-05419-JD (N.D. Cal.), *VoIP-Pal, Inc. v. Meta Platforms, Inc.*, Case No. 3:22-cv-04279-JD (N.D. Cal.), and related cases. An attorney from my firm attended that hearing, and I conferred with counsel for Google and Meta about the hearing. I was informed that Judge Donato held that VoIP-Pal had two weeks to file an answer to a related declaratory judgment complaint and that the parties seeking to invalidate the ’606 patent under 35 U.S.C. section 101 would then have up to four weeks to file a consolidated motion for judgment on the pleadings. I was further informed that Judge Donato will rule on that motion, but that the cases pending in the Northern District of California will otherwise be stayed

pending the resolution of the VoIP-Pal cases in the Western District of Texas if the motion for judgment on the pleadings is not granted.

6. I conferred with counsel for Google and Meta and they intend to file a consolidated motion for judgment on the pleadings on or before the deadline set by Judge Donato.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: January 26, 2023

/s/ Daniel T. Shvodian  
Daniel T. Shvodian

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served January 26, 2023 to all counsel of record, via the Court's CM/ECF system.

/s/ Daniel T. Shvodian

Daniel T. Shvodian