

**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-272-ADA

FIRST AMENDED JOINT CLAIM CONSTRUCTION STATEMENT

In advance of the claim construction hearing scheduled for February 15, 2023 and in light of several defendants being transferred to other venues, Plaintiff and Defendants submit this First Amended Joint Claim Construction Statement with respect to U.S. Patent No. 10,218,606.

I. AGREED-UPON CLAIM TERMS:

Claim Term	Agreed Construction
“network element(s)” claims 1, 4, 8, 14, 19-21, 23, 24, 27, 32	Plain and ordinary meaning
“identifier(s)” claims 1, 5, 6, 8, 9, 11, 14, 15, 19, 21, 22, 27, 32, 42, 44	Plain and ordinary meaning
“first participant profile” claims 1, 3, 19-21, 42, 44	Plain and ordinary meaning
“private network” claim 8	Plain and ordinary meaning

II. DISPUTED CLAIM TERMS:

Claim Term	Plaintiff’s Construction	Defendants’ Construction	Proposing Party
“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

Claim Term	Plaintiff's Construction	Defendants' Construction	Proposing Party
"gateway" ¹ claims 14, 26	Plain and ordinary meaning	Plain and ordinary meaning, which is "device that connects networks that use different communication protocols."	Defendants

¹ The Court construed the identical term "gateway" to mean "a device that connects networks and can adjust a protocol of traffic moving between the networks" in the Claim Construction Order issued on June 3, 2022, in *VoIP-Pal.com, Inc. v. Amazon.com, Inc., et al.*, No. 6:21-cv-00668-ADA, Dkt. No. 67 (W.D. Tex.). While the parties maintain the assertion of their proposed constructions, the parties agree that they will not argue this term at the claim construction hearing if the Court preliminarily adopts the same construction as in the other matter.

Dated: February 8, 2023

Respectfully submitted,

/s/Lewis E. Hudnell, III

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the forgoing FIRST AMENDED JOINT CLAIM CONSTRUCTION STATEMENT via the Court's CM/ECF system pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5(b)(1) this 8th day of February, 2023.

By: /s/Lewis E. Hudnell, III

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