

# EXHIBIT 4

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

**PLAINTIFF VOIP-PAL.COM, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION  
OF DOCUMENTS AND THINGS TO DEFENDANTS AMAZON.COM, INC.,  
AMAZON.COM SERVICES LLC, AND AMAZON WEB SERVICES, INC. (NOS. 1-56)**

In accordance with the provisions of Rule 34 of the Federal Rules of Civil Procedure, Plaintiff VoIP-Pal.com, Inc. (“VoIP-Pal”) requests that Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc. (collectively “Defendants” or “Amazon”), through their counsel, respond separately and fully for the production of documents and things requested herein by the time periods prescribed by the Federal Rules of Civil Procedure. All documents and things shall be produced to VoIP-Pal at the offices of its attorneys at the address listed below. VoIP-Pal’s Requests for Production are deemed to be continuing up to and including the time of trial.

**INSTRUCTIONS AND DEFINITIONS**

1. These Requests seek production to the full extent provided by the Federal Rules of Civil Procedure and shall be interpreted as inclusive rather than exclusive. They are of a continuing nature and, to the extent required by applicable statutes and regulations, Amazon is required to make supplemental production if, prior to the termination of this action, Amazon obtains additional or different documents and/or things covered by any of these Requests.

2. The term “Amazon,” “You,” “Your,” or “Defendants” shall refer to (i) Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc. and (ii) any of Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc.’s agents, employees, and attorneys, or any other person or entity acting in concert, directly or indirectly, with any of (i).
3. The term “VoIP-Pal” shall refer to Plaintiff VoIP-Pal.com, Inc.
4. The term “Accused Products” shall mean the Accused Products or Accused Instrumentalities identified in VoIP-Pal’s Infringement Contentions.
5. The term “Accused Uses” shall mean the performance of any step of any claim of the patent-in-suit that are process or method claims by Amazon or by any person or entity using the Accused Products anywhere in the world, whether alone or in conjunction with Amazon or any third party, regardless of whether the performance of all of the steps in a claim of the patent-in-suit constitutes infringement of the claimed process or method in Amazon’s opinion.
6. The term “the ’606 patent” refers to U.S. Patent No. 10,218,606.
7. The term “patent-in-suit” refers to the ’606 patent or patents and patent applications related to the ’606 patent.
8. The term “Asserted Claim” means any claim of the patent-in-suit VoIP-Pal asserts in this action.
9. The term “Documents” is defined as synonymous in meaning and equal in scope to the usage of this term in Fed. R. Civ. P. 34(a), and is used in its broadest sense and should be understood to include any written, printed, typed, and visually, aurally, or electronically reproduced material of any kind, whether or not privileged, including but not limited to: “Electronically Stored Information” or “ESI” (as defined below in these Definitions), computer files, source code, computer input and output, computer memory devices, backup media, and databases; files and file folders; books and their contents, whether printed or recorded or reproduced by hand or any other mechanical process, or written or reproduced by hand or any other mechanical process; and all other tangible manifestations of communications whether or not

claimed to be privileged, confidential, or personal; namely, communications, including intra-company communications, correspondence, telegrams, memoranda, printed publications, summaries or records of telephone conversations, summaries or records of personal conversations; text messages, diaries; forecasts; statistical statements; patents, laboratory and engineering reports and notebooks, changes, plans, specifications, technical papers, data sheets, drawings, sketches, schematics, graphs, flow charts, samples, prototypes and tangible things, evaluation boards, developers guidelines; photographs, audio tapes, sound reproductions, motion pictures, films, and videotapes; minutes or records of meetings, including directors' meetings, minutes or records of conferences; expressions of statements or policy; lists of persons attending meetings or conferences; reports and/or summaries of interviews or investigations; opinions or reports of consultants' patent appraisals; opinions of counsel; agreements; records, reports or summaries of negotiations; brochures, calendars, pamphlets, advertisements, circulars, trade letters, packing materials and notices, press releases; litigation files and databases; and any drafts or revisions of any Document and any notes or comments appearing on any Document, whether preliminary or marginal. A comment or notation appearing on any Document, and not a part of the original Document, is considered a separate Document within the meaning of the term. A draft or non-identical copy is a separate Document within the meaning of the term.

10. The term "Electronically Stored Information", ("ESI") means information created, manipulated, communicated, stored, and best utilized in digital form, requiring the use of computer hardware and software and includes, but is not limited to all data recorded or stored on main frame computers, network file systems, servers, workstations, computer databases, personal computers, laptop computers, zip drives, thumb drives, memory sticks, external drives, removable drives, diskettes, CDs, DVDs, smart phones, personal digital assistants, digital photographs, videotapes,

audio tapes and similar media. This includes, by way of example, but not limited to computer-aided design files, CAD, CAM, and other similar drawings, digital photographs, electronic mail (email) (and attachments thereto), Amazondata, object code, presentations, software, source code, spreadsheets, voice mail, word processor files, text messages and other electronically stored compilations. All non-identical versions and drafts are to be produced as separate items..

11. The term “Thing” has the meaning prescribed in Rule 34, of the Federal Rules of Civil Procedure and/or includes every kind of physical specimen or tangible item or object, other than a Document, in the possession, custody or control of Amazon.

12. As used herein, the singular shall include the plural and vice versa, except where the context does not permit. The terms “and” and “or” shall be both conjunctive and disjunctive as to bring within the scope of a request all information that might otherwise be construed to be outside its scope. The term “or” shall mean “and/or.” The terms “any” and “all” shall mean “any and all.” The term “including” shall mean “including without limitation.”

13. The term “person” shall refer to any natural person or any business, legal or governmental entity or association.

14. The terms “relate to,” “evidencing,” “relating to,” “relates to,” or “concerning” shall be construed broadly to mean evidencing, constituting, referring to, comprising, illustrating, recording, memorializing, discussing, or describing.

15. The use of any verb in any tense shall be construed as the use of the verb in all other tenses.

16. The term “communication” or “communications” shall refer to the transmittal of information, in the form of facts, ideas, inquiries, or otherwise, regardless of the manner in which such communication took place.

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