

# EXHIBIT 2022

**Re: VoIP-Pal.com v. T-Mobile: Claim Narrowing**

Lewis Hudnell <lewis@hudnelllaw.com>

Fri 5/12/2023 6:04 PM

To: Gilmore, Martin (AUS) <MGilmore@perkinscoie.com>

Cc: Tessar, Amanda (DEN) <ATessar@perkinscoie.com>; \*T-Mobile-VOIP <TMobile-VOIP@perkinscoie.com>; melissa@gillamsmithlaw.com <melissa@gillamsmithlaw.com>; **VoIP-Pal.WDTX <VoIP-Pal.WDTX@hudnelllaw.com>**; Sean Parmenter <sean@parmenterip.com>; Parrish, Bill <BPARRISH@stradlinglaw.com>

 1 attachments (26 KB)

TMO cmts 2023-05-12 Meet and Confer Report REDLINE TMO [VoIP-Pal].docx;

Dear Martin,

I accepted your changes and added our redlines. Please let me know if T-Mobile has any further changes.

The following is VoIP-Pal's narrowed list of asserted claims:

'234 patent: claims 32, 38, 51, 62

'721 patent: claims 43, 77, 130, 133, 138, 140

Regards,

Lewis E. Hudnell, III  
Hudnell Law Group PC  
t: 650.564.7720  
f: 347.772.3034  
m: 917.861.3494  
e: lewis@hudnelllaw.com  
www.hudnelllaw.com

This e-mail message is intended for the sole use of the intended recipient(s) and may contain information that is confidential, privileged and/or attorneys' work product. Any review or distribution by any other person is prohibited. If you are not an intended recipient, please immediately contact the sender and delete all copies.

---

**From:** Gilmore, Martin (AUS) <MGilmore@perkinscoie.com>

**Sent:** Friday, May 12, 2023 5:19 PM

**To:** Lewis Hudnell <lewis@hudnelllaw.com>

**Cc:** Tessar, Amanda (DEN) <ATessar@perkinscoie.com>; \*T-Mobile-VOIP <TMobile-VOIP@perkinscoie.com>; melissa@gillamsmithlaw.com <melissa@gillamsmithlaw.com>; VoIP-Pal.WDTX <VoIP-Pal.WDTX@hudnelllaw.com>; Sean Parmenter <sean@parmenterip.com>; Parrish, Bill

**Re: VoIP-Pal/T-Mobile: Willfulness**

Lewis Hudnell

Tue 5/23/2023 8:31 PM

To: Gilmore, Martin (AUS) <MGilmore@perkinscoie.com>; Tessar, Amanda (DEN) <ATessar@perkinscoie.com>  
Cc: Nick Gikkas <Nick@hudnelllaw.com>; sean@parmenterip.com <sean@parmenterip.com>; \*T-Mobile-VOIP <T-Mobile-VOIP@perkinscoie.com>; Melissa Smith <Melissa@gillamsmithlaw.com>; VoIP-Pal.WDTX <VoIP-Pal.WDTX@hudnelllaw.com>

Dear Martin,

I believe that my email was unequivocal: VoIP-Pal intends to assert only post-suit willfulness. VoIP-Pal may rely on pre-suit and post-suit conduct to prove that claim. That means that all of T-Mobile's conduct from the time it received notice of the patents is in play. See, e.g., Pinn, Inc. v. Apple Inc., No. SA 19-CV-1805-DOC-JDE, 2020 U.S. Dist. LEXIS 234792, at \*7 (C.D. Cal. Nov. 24, 2020) (citing Mentor Graphics Corp. v. EVE-USA, Inc., 851 F.3d 1275, 1295 (Fed. Cir. 2017)) (relying on pre-suit activities in support of post-suit willfulness).

Regarding inducement, VoIP-Pal agrees to further narrow the asserted claims and not assert claims 43 and 140 of the '721 patent. Thus, VoIP-Pal does not intend to present an inducement theory at trial. If T-Mobile wants a stipulation, then please send us a draft to review.

Regards,

Lewis E. Hudnell, III  
Hudnell Law Group PC  
t: 650.564.7720  
f: 347.772.3034  
m: 917.861.3494  
e: lewis@hudnelllaw.com  
www.hudnelllaw.com

This e-mail message is intended for the sole use of the intended recipient(s) and may contain information that is confidential, privileged and/or attorneys' work product. Any review or distribution by any other person is prohibited. If you are not an intended recipient, please immediately contact the sender and delete all copies.

---

**From:** Gilmore, Martin (AUS) <MGilmore@perkinscoie.com>

**Sent:** Saturday, May 20, 2023 9:29 PM

**To:** Lewis Hudnell <lewis@hudnelllaw.com>; Tessar, Amanda (DEN) <ATessar@perkinscoie.com>

**Cc:** Nick Gikkas <Nick@hudnelllaw.com>; sean@parmenterip.com <sean@parmenterip.com>; \*T-Mobile-VOIP <T-Mobile-VOIP@perkinscoie.com>; Melissa Smith <Melissa@gillamsmithlaw.com>; VoIP-Pal.WDTX <VoIP-Pal.WDTX@hudnelllaw.com>

**Subject:** RE: VoIP-Pal/T-Mobile: Willfulness

Dear Lewis,

Please provide a response to this email.