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

VOIP-PAL.COM, INC. Plaintiff, v. FACEBOOK, INC, and WHATSAPP, INC. Defendants.	CIVIL ACTION NO. 6:21-cv-665-ADA
VOIP-PAL.COM, INC. Plaintiff, v. GOOGLE LLC, Defendant.	CIVIL ACTION NO. 6:21-cv-667-ADA
VOIP-PAL.COM, INC. Plaintiff, v. AMAZON.COM, INC.; AMAZON.COM SERVICES LLC; and AMAZON WEB SERVICES, INC., Defendants.	CIVIL ACTION NO. 6:21-cv-668-ADA

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GOOGLE EXHIBIT 1013

VOIP-PAL.COM, INC. Plaintiff, v. VERIZON COMMUNICATIONS, INC.; CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS; VERIZON SERVICES, CORP.; and VERIZON BUSINESS NETWORK SERVICES, INC., Defendants.	CIVIL ACTION NO. 6:21-cv-672-ADA
VOIP-PAL.COM, INC. Plaintiff, v. T-MOBILE USA, INC. Defendant.	CIVIL ACTION NO. 6:21-cv-674-ADA

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JOINT CLAIM CONSTRUCTION STATEMENT

Under the Scheduling Order (Case No. 6:21-cv-665, Dkt. No. 38), Plaintiff and Defendants submit this Joint Claim Construction Statement with respect to U.S. Patent Nos. 8,630,234 and 10,880,721.

I. AGREED-UPON CLAIM TERMS:

Claim Term	Agreed Construction
"access server" '234 patent, claims 1, 11, 19-21, 25, 28; '721 patent, claims 1, 16, 20, 34, 38, 39, 46, 49, 50	Plain and ordinary meaning
"routing controller" '234 patent, claims 10, 19, 28, 32, 48, 62, 64; '721 patent, claims 15, 16, 34, 49, 51, 77, 103, 109, 110, 124	Plain and ordinary meaning
"means for receiving, from a user of the mobile telephone, a callee identifier" '234 patent, claim 11	Governed by 35 U.S.C. § 112, ¶ 6 **Function:** receiving, from a user of the mobile telephone, a callee identifier **Structure:** a dialing input, which is a key pad, a voice recognition unit, or a parameter memory with prestored callee identifiers
"means for transmitting an access code request message to an access server" '234 patent, claim 11; '721 patent, claim 20	Governed by 35 U.S.C. § 112, ¶ 6 **Function:** transmitting an access code request message to an access server **Structure:** a network interface
"means for receiving an access code reply message from the access server in response to [said/the] access code request message" '234 patent, claim 11; '721 patent, claim 20	Governed by 35 U.S.C. § 112, ¶ 6 **Function:** receiving an access code reply message from the access server in response to [said/the] access code request message **Structure:** a network interface

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Claim Term	Agreed Construction
"means for receiving from the mobile telephone [said/an] access code request message" '234 patent, claims 19, 46	Governed by 35 U.S.C. § 112, ¶ 6 **Function:** receiving from the mobile telephone [said/an] access code request message **Structure:** a network interface
"means for transmitting [said/an/the] access code reply message including [said/the] access code to the [mobile telephone/wireless apparatus]" '234 patent, claims 19, 46; '721 patent, claims 34, 77	Governed by 35 U.S.C. § 112, ¶ 6 **Function:** transmitting [said/an/the] access code reply message including [said/the] access code to the [mobile telephone/wireless apparatus] **Structure:** a network interface
"means for receiving from a user of the wireless apparatus a destination node identifier" '721 patent, claim 20	Governed by 35 U.S.C. § 112, ¶ 6 **Function:** receiving from a user of the wireless apparatus a destination node identifier **Structure:** a dialing input, which is a key pad, a voice recognition unit, or a parameter memory with prestored callee identifiers
"means for receiving from the wireless [apparatus/device] [the/an] access code request message" '721 patent, claims 34, 77	Governed by 35 U.S.C. § 112, ¶ 6 **Function:** receiving from the wireless [apparatus/device] [the/an] access code request message **Structure:** a network interface

II. DISPUTED CLAIM TERMS:

Claim Term	Plaintiff's Construction	Defendants' Construction	Proposing Party
"roaming"	Plain and ordinary meaning[1]	Preamble is limiting.	Defendants

[1] Plaintiff disputes that it has made any assertion about how the plain and ordinary meaning of "roaming" should be construed.

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Claim Term	Plaintiff's Construction	Defendants' Construction	Proposing Party
'234 patent, claims 1, 19, 28, 30, 46, 62; '721 patent, claims 34, 49		Plain and ordinary meaning of "roaming" is "being in another mobile telephone service provider's network and not the mobile telephone's home network." This contrasts with Plaintiff's assertion that the plain and ordinary meaning of "roaming" is "use [of a communication device] over a geographical area."	
"callee identifier" '234 patent, claims 1, 11, 20, 25, 28, 30, 46, 62	Plain and ordinary meaning	"telephone number, and not a username"[2]	Defendants
"access code" '234 patent, claims 1, 10, 11, 19-21, 25, 28, 30-33, 38, 40, 43, 45-48, 54, 61, 62, 64, 65, 70, 72, 75; '721 patent, claims 1, 14, 16, 20, 34, 38, 39, 46, 49-51, 57, 63, 77, 103, 104, 109, 110, 124, 130, 135, 138-40	Plain and ordinary meaning	"code used by the [mobile telephone / wireless device / wireless apparatus] in place of the callee identifier"	Defendants
"access code request message"	Plain and ordinary meaning	"message sent from the [mobile device / wireless device / wireless apparatus]	Plaintiff

[2] Defendant Google LLC ("Google") does not join the other Defendants' proposed construction and instead believes that this term does not require construction.

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Claim Term	Plaintiff's Construction	Defendants' Construction	Proposing Party
'234 patent, claims 1, 10, 11, 19-21, 28, 30, 31, 40, 46, 47, 62, 72; '721 patent, claims 1, 16, 20, 34, 38, 39, 49-51, 77, 103, 104, 135		and received by the access server"[3]	
"access code reply message" '234 patent, claims 1, 10, 11, 19, 20, 25, 28, 30, 43, 45, 46, 61, 62, 75; '721 patent, claims 1, 16, 20, 34, 38, 46, 49-51, 77, 103, 124, 135, 138-40	Plain and ordinary meaning	"message sent from the access server and received by the [mobile device / wireless device / wireless apparatus]"[4]	Plaintiff
"pool of access codes" '234 patent, claims 1, 11, 20, 30, 38, 46, 54, 57, 62, 70; '721 patent, claims 63, 109	Plain and ordinary meaning	"table containing access codes for exclusive association with a [callee identifier / destination node identifier]"[5]	Defendants
"local call" '234 patent, claims 1, 11, 20	"A call that is made in a geographical area associated with the caller's device"	Plain and ordinary meaning, which is "call within the PSTN local calling area of the mobile telephone"	Defendants
"means for initiating a call	Governed by 35 U.S.C. § 112, ¶ 6	Governed by 35 U.S.C. § 112, ¶ 6	Defendants

[3] Google and Amazon do not join the other Defendants' proposed construction and instead agree with Plaintiff's proposed construction.
[4] Google and Amazon do not join the other Defendants' proposed construction and instead agree with Plaintiff's proposed construction.
[5] Google does not join the other Defendants' proposed construction and instead believes that this term does not require construction.

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Claim Term	Plaintiff's Construction	Defendants' Construction	Proposing Party
using said access code to identify the callee" '234 patent, claim 11	**Function:** initiating a call using said access code to identify the callee **Structure:** Mobile wireless device 12 having a microprocessor 52 programmed to implement the algorithm illustrated in FIG. 3, which includes block 149 labeled "Initiate voice/video call using access code." The wireless device 12 includes I/O port(s) 56 capable of acting as an interface to external networks (70, 72, 15, 16). See FIG. 2.	**Function:** initiating a call using said access code to identify the callee **Structure:** a network interface, including switched line channels in a public switched telephone network (PSTN)[6]	
"means for selecting said access code from a pool of access codes" '234 patent, claim 46	Governed by 35 U.S.C. § 112, ¶ 6 **Function**: selecting said access code from a pool of access codes **Structure**: Access server 14 and/or a routing controller 30 having a microprocessor (152 or 232) programmed to implement the algorithm illustrated in FIG. 7 including step 196, FIG. 12 and/or disclosed alternative embodiments or equivalents thereof. Various	Governed by 35 U.S.C. § 112, ¶ 6 **Function**: selecting said access code from a pool of access codes **Structure**: a processor (of the routing controller), a memory storing table memory in a form given in FIG. 10, a temporary memory containing a local calling area identifier and an access code store, and a clock for selecting an access code from a pool of access	Defendants

[6] Google does not join the other Defendants' proposed structure and instead offers as a proposed structure "a network interface."

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Claim Term	Plaintiff's Construction	Defendants' Construction	Proposing Party
	embodiments of a routing controller producing an access code are disclosed at col. 15, line 7 to col. 22 line 60, for example. In some embodiments, the routing controller is part of or integrated with the access server; see col. 17 lines 19-30.	codes using the algorithm given in FIG. 12[7]	
"gateway" '721 patent, claims 1, 20, 38, 51, 77, 103, 133	Plain and ordinary meaning[8]	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

[7] Google does not join the other Defendants' proposed structure and instead offers as a proposed structure "a processor (of the routing controller) with searching access to a pool of access codes."
[8] Plaintiff disputes that it has made any assertion about how the plain and ordinary meaning of "gateway" should be construed.

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Respectfully submitted,

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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 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 6th day of May, 2021.

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