

1 **ALVERSON, TAYLOR,**
2 **MORTENSEN & SANDERS**
3 KURT R. BONDS, ESQ.
4 Nevada Bar No. 6228
5 ADAM R. KNECHT, ESQ.
6 Nevada Bar No. 13166
7 7401 W. Charleston Boulevard
8 Las Vegas, NV 89117
9 (702) 384-7000
10 efile@alversontaylor.com
11 *Attorneys for Plaintiff*

12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

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15 VOIP-PAL.COM, INC., a Nevada corporation,

CASE NO.:

16 Plaintiff,

17 v.

CHART 3 TO EXHIBIT E

18 VERIZON WIRELESS SERVICES, LLC, a
19 Delaware limited liability corporation;
20 VERIZON COMMUNICATIONS, INC., a
21 Delaware corporation; AT&T, INC., a
22 Delaware corporation; AT&T CORP., a
23 Delaware corporation; and DOES I through X,
24 inclusive,

**ASSERTED CLAIMS AND
INFRINGEMENT CONDITIONS AS
AGAINST THE VERIZON
ENTITIES**

25 Defendants.

26 **CHART 3 TO EXHIBIT E**

27 **CHART SUPPORTING ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS
28 CONCERNING U.S. PATENT NO. 8,542,815**

Verizon Wireless Services, Inc. and Verizon Communications, Inc. (collectively, “Verizon”) support a Wi-Fi based calling platform (“Verizon Wi-Fi Calling”) that includes mobile devices, software running on such devices and servers operated by Verizon that allows calls to be placed over

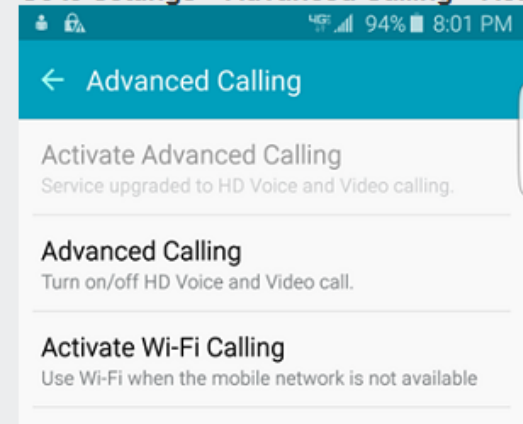
1 Wi-Fi networks. Verizon practices directly and/or indirectly certain claims of U.S. Patent 8,542,815
 2 (“the ‘815 patent”) as illustrated in the chart below.

3 Verizon Wi-Fi Calling allows a mobile device to initiate a call between a caller and a callee
 4 using a carrier assisted voice over IP (“VoIP”) system and the callee may be a Verizon subscriber or
 5 a non-subscriber. A profile that includes calling attributes is used as part of the process that
 6 classifies the call. As explained in the chart below, the use of attributes is needed for one or more of
 7 the following purposes: (1) interpretation of the callee identifier; (2) handling of inactive, suspended
 8 or blocked accounts; (3) handling customer billing authorization.

9 This chart applies claims 1, 2, 7, 27 – 29, 34, 54, 72 – 74, 92, 93 and 111 of the ‘815 Patent
 10 to Verizon Wi-Fi Calling.

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<p>1. [1p] A process for operating a call routing controller to facilitate communication between callers and callees in a system comprising a plurality of nodes with which callers and callees are associated, the process comprising:</p> <p>Verizon Wi-Fi Calling includes a call routing controller to facilitate communication between callers and callees in a system comprising a plurality of nodes with which callers and callees are associated.</p> <p>Verizon supports Wi-Fi Calling on mobile devices including Samsung Galaxy S6 smartphones.</p> <p>1. What is Wi-Fi Calling?</p> <p>Wi-Fi Calling allows you to make and receive calls over a Wi-Fi network if cellular is not available.</p> <p>The benefits of Wi-Fi Calling include:</p> <ul style="list-style-type: none"> • It's included at no additional charge with your existing voice plan and compatible device. • You can make and receive calls in Wi-Fi using your phone number. • Wi-Fi calls to US numbers are free, even while traveling internationally. • Video Calls no longer require an LTE connection to be initiated in Wi-Fi. <p>3. Which devices support Wi-Fi Calling?</p> <p>The Samsung Galaxy S® 6 and Samsung Galaxy S® 6 edge with the latest system update support Wi-Fi Calling. This list of devices will grow over time.</p> <p>Verizon Wi-Fi Calling allows Samsung Galaxy S6 smartphones connected to a Wi-Fi network to place calls to other users.</p>

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	<p>Make calls over Wi-Fi It's easy. Start by going to Settings > Advanced Calling > Activate Advanced Calling. Once Advanced Calling is active, you can turn on HD Voice and Wi-Fi Calling from the same settings menu.</p> <p>Go to Settings > Advanced Calling > Activate Wi-Fi Calling</p>  <p>Verizon Wi-Fi Calling uses a call routing controller that comprises the Samsung device and Verizon operated equipment.</p> <p>Verizon Wi-Fi Calling comprises a plurality of nodes with which callers and callees are associated.</p>
[1a] in response to initiation of a call by a calling subscriber, receiving a caller identifier and a callee identifier;	<p>Verizon Wi-Fi Calling receives a caller identifier and a callee identifier in response to initiation of a call by a calling subscriber.</p> <p>A call is initiated by the Samsung device beginning with the establishment of communication between the device and a server operated by Verizon. The first participant identifier includes the phone number of the first participant. The second participant identifier includes the phone number of the second participant.</p>
[1b] locating a caller dialing profile comprising a username associated with the caller and a plurality of calling attributes associated with the caller;	<p>Verizon Wi-Fi Calling locates a caller dialing profile comprising a username associated with the caller and a plurality of calling attributes associated with the caller.</p> <p>A caller dialing profile including calling attributes includes information used in the classification of a call, such as settings stored on the local device, information stored on Verizon servers, and/or information obtained regarding the connection of the local device to the network.</p>

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Claim	Accused Device/Instrumentality
<p>[1c] determining a match when at least one of said calling attributes matches at least a portion of said callee identifier;</p>	<p>Verizon Wi-Fi Calling determines a match when at least one of said calling attributes matches at least a portion of said callee identifier.</p> <p>Calling attributes tell the server how to set up the call for a variety of different purposes.</p> <p><u>1. Interpretation of the callee identifier.</u> A match may include processing the callee identifier according to a caller related interpretation. The callee identifier may need to be interpreted according to the location from which the caller is registered and/or the location from which the caller is currently located, for example to handle international, national and local dialing patterns. Also, abbreviated dialing patterns such as 311, 511 and 811 are handled according to a local calling area. An “Emergency Address” is needed in the case of 911 calls that are handled using Verizon Wi-Fi Calling.</p> <p>1. Why do I need to set up an address to use Calling on Verizon Messages or Wi-Fi Calling?</p> <div style="background-color: #f0f0f0; padding: 5px; margin: 5px 0;"> <p>To offer voice service over the Internet, Verizon is required by the FCC to support 911 calls collect a registered location to enable it. By registering an address, you are providing information to the Network that determines how your 911 call will route and will be provided to emergency services if you are unable to report your physical location. This address will be used if you use the Verizon Messages app or if you use Wi-Fi Calling in an area or location where cell service is not available. This information is not used for billing or other purposes. Whenever possible, use your phone to dial 911 in an emergency and tell the 911 operator where you</p> </div> <p><u>2. Inactive, suspended or blocked accounts and blocked numbers.</u> A match may include determining if the account of the caller is active and/or if the caller’s account has blocked communication with the callee. The caller account could be set up to block certain outgoing calls, such as international calls or toll destinations. The caller account could also be set up to block calls to specific numbers.</p> <p><u>3. Billing authorization.</u> A match may include determining if the caller account has sufficient authorization to process a charge associated with the communication. In cases where a communication involves a charge, the caller account needs to be consulted to validate the customer credit card, to determine if a purchase limit has been reached, and/or to determine if purchases have been blocked altogether.</p>
<p>[1d] classifying the call as a public network</p>	<p>Verizon Wi-Fi Calling classifies the call as a public network call when the match meets public network classification criteria and classifying the call as a private network call when the match meets private network</p>

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Claim	Accused Device/Instrumentality
<p>call when said match meets public network classification criteria and classifying the call as a private network call when said match meets private network classification criteria;</p>	<p>classification criteria.</p> <p>Verizon Wi-Fi Calling allows calls to be sent using Verizon’s private network and over the public PSTN network. Private network classification criteria represents routing calls over Verizon’s private network. Public network classification criteria represents routing calls over the PSTN network.</p> <p>Calling attributes are used for a number of different purposes to establish a private or public network classification criteria.</p> <p><u>1. Interpretation of the callee identifier.</u> A private network classification would mean that the call can be sent over Verizon’s private network after the callee identifier has been processed according to a caller related interpretation. A public network classification would mean that the call can be sent over the PSTN network after the callee identifier has been processed according to a caller related interpretation.</p> <p><u>2. Inactive, suspended or blocked accounts.</u> A private network classification would mean that the call can be sent over Verizon’s private network and the account of the caller is active and/or that the caller’s account has not blocked communication with the callee. A public network classification would mean that the call can be sent over the PSTN network and the account of the caller is active and/or that the caller’s account has not blocked communication with the callee.</p> <p><u>3. Customer billing authorization.</u> A private network classification would mean that call can be sent over Verizon’s private network and the caller account has sufficient authorization to process a charge associated with the communication. A public network classification would mean that call can be sent over the PSTN network and the caller account has sufficient authorization to process a charge associated with the communication.</p>
<p>[1e] when the call is classified as a private network call, producing a private network routing message for receipt by a call controller, said private network routing</p>	<p>Verizon Wi-Fi Calling produces a private network routing message for receipt by a call controller that identifies an address, on the private network, associated with the callee, when the call is classified as a private network call.</p> <p>The Verizon operated controller routes the call to its own subscriber over its private network.</p>

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<p>message identifying an address, on the private network, associated with the callee;</p>	
<p>[1f] when the call is classified as a public network call, producing a public network routing message for receipt by the call controller, said public network routing message identifying a gateway to the public network.</p>	<p>Verizon Wi-Fi Calling produces a public network routing message for receipt by the call controller that identifies a gateway to the public network, when the call is classified as a public network call.</p> <p>If a call is made over the PSTN network, a PSTN gateway is identified to route the call.</p> <p>.</p>
<p>2. The process of claim 1 further comprising receiving a request to establish a call, from a call controller in communication with a caller identified by said callee identifier.</p>	<p>Verizon Wi-Fi Calling receives a request to establish a call from a call controller in communication with a caller identified by said callee identifier.</p>
<p>7. The process of claim 1 further comprising formatting said callee identifier into a pre-defined digit format to</p>	<p>Verizon Wi-Fi Calling formats said callee identifier into a pre-defined digit format to produce a re-formatted callee identifier.</p>

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Claim	Accused Device/Instrumentality
produce a re-formatted callee identifier.	
27. [27p] A non-transitory computer readable medium encoded with codes for directing a processor to execute a method of operating a call routing controller to facilitate communication between callers and callees in a system comprising a plurality of nodes with which callers and callees are associated.	Verizon Wi-Fi Calling includes a non-transitory computer readable medium encoded with codes for directing a processor to execute a method of operating a call routing controller to facilitate communication between callers and callees in a system comprising a plurality of nodes with which callers and callees are associated. See claim element [1p].
[27a] in response to initiation of a call by a calling subscriber, receiving a caller identifier and a callee identifier;	See claim element [1a].
[27b] locating a caller dialing profile comprising a username associated with	See claim element [1b].

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Claim	Accused Device/Instrumentality
the caller and a plurality of calling attributes associated with the caller;	
[27c] determining a match when at least one of said calling attributes matches at least a portion of said callee identifier;	See claim element [1c].
[27d] classifying the call as a public network call when said match meets public network classification criteria and classifying the call as a private network call when said match meets private network classification criteria;	See claim element [1d].
[27e] when the call is classified as a private network call, producing a private network routing message for receipt by a call controller, said private network routing message	See claim element [1e].

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Claim	Accused Device/Instrumentality
identifying an address, on the private network, associated with the callee; and	
[27f] when the call is classified as a public network call, producing a public network routing message for receipt by a call controller, said public network routing message identifying a gateway to the public network.	See claim element [1f].
28. [28p] A call routing apparatus for facilitating communications between callers and callees in a system comprising a plurality of nodes with which callers and callees are associated, the apparatus comprising:	Verizon Wi-Fi Calling includes a call routing apparatus for facilitating communications between callers and callees in a system comprising a plurality of nodes with which callers and callees are associated. See claim element [1p].
[28a] receiving means for receiving a caller identifier and a callee identifier, in response to	See claim element [1a].

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Claim	Accused Device/Instrumentality
initiation of a call by a calling subscriber;	
[28b] means for locating a caller dialing profile comprising a username associated with the caller and a plurality of calling attributes associated with the caller;	See claim element [1b].
[28c] means for determining a match when at least one of said calling attributes matches at least a portion of said callee identifier;	See claim element [1c].
[28d] means for classifying the call as a public network call when said match meets public network classification criteria;	See claim element [1d].
[28e] means for classifying the call as a private network call when said match meets private network classification criteria;	See claim element [1d].

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Claim	Accused Device/Instrumentality
<p>[28f] means for producing a private network routing message for receipt by a call controller, when the call is classified as a private network call, said private network routing message identifying an address, on the private network, associated with the callee; and</p>	<p>See claim element [1e].</p>
<p>[28g] means for producing a public network routing message for receipt by a call controller, when the call is classified as a public network call, said public network routing message identifying a gateway to the public network.</p>	<p>See claim element [1f].</p>
<p>29. The apparatus of claim 28 wherein said receiving means is operably configured to receive a request to establish a</p>	<p>See claim 2.</p>

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call, from a call controller in communication with a caller identified by said callee identifier.	
34. The apparatus of claim 28 further comprising formatting means for formatting said callee identifier into a pre-defined digit format to produce a re-formatted callee identifier.	See claim 7.
54. [54p] A process for operating a call routing controller to establish a call between a caller and a callee in a communication system, the process comprising:	Verizon Wi-Fi Calling includes a call routing controller to establish a call between a caller and a callee in a communication system. See claim element [1p].
[54a] in response to initiation of a call by a calling subscriber, locating a caller dialing profile comprising a plurality of calling attributes	See claim element [1b].

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associated with the caller; and	
[54b] when at least one of said calling attributes and at least a portion of a callee identifier associated with the callee match and when the match meets a private network classification criterion,	See claim elements [1c], [1d].
[54c] producing a private network routing message for receipt by a call controller, said private network routing message identifying an address, on a private network, the address being associated with the callee; and	See claim element [1e].
[54d] when at least one of said calling attributes and said at least said portion of said callee identifier associated with the callee match and when the match meets a public network	See claim elements[1c], [1d].

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classification criterion,	
[54e] producing a public network routing message for receipt by a call controller, said public network routing message identifying a gateway to a public network.	See claim element [1f].
72. The process of claim 54 further comprising causing the private network routing message or the public network routing message to be communicated to a call controller to effect routing of the call.	Verizon Wi-Fi Calling causes causing the private network routing message or the public network routing message to be communicated to a call controller to effect routing of the call.
73. A non-transitory computer readable medium encoded with codes for directing a processor to execute the method of claim 54.	Verizon Wi-Fi Calling includes a non-transitory computer readable medium encoded with codes for directing a processor to execute the method of claim 54. See claim elements [54p], [54a], [54b], [54c], [54d] and [54e].
74. [74p] A call routing	Verizon Wi-Fi Calling includes a call routing controller apparatus for establishing a call between a caller and a callee in a communication

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controller apparatus for establishing a call between a caller and a callee in a communication system, the apparatus comprising:	system. See claim element [1p].
[74a] a processor operably configured to:	Verizon Wi-Fi Calling includes of multiple machines with processors at multiple Verizon locations, including servers and gateways accessible over local and wide area networks.
[74b] access a database of caller dialing profiles wherein each dialing profile associates a plurality of calling attributes with a respective subscriber, to locate a dialing profile associated with the caller, in response to initiation of a call by a calling subscriber; and	Verizon Wi-Fi Calling includes a database of caller dialing profiles, each associating a plurality of calling attributes with a respective subscriber, to locate a dialing profile associated with the caller, in response to initiation of a call by a calling subscriber. See claim elements [1a], [1b].
[74c] produce a private network routing message for receipt by a call controller, said private network routing message identifying an address, on a	See claim element [1e].

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private network, through which the call is to be routed,	
[74d] when at least one of said calling attributes and at least a portion of a callee identifier associated with the callee match and when the match meets a private network classification criterion, the address being associated with the callee; and	See claim elements [1c], [1d].
[74e] produce a public network routing message for receipt by a call controller, said public network routing message identifying a gateway to a public network,	See claim element [1f].
[74f] when at least one of said calling attributes and said at least said portion of said callee identifier associated with the callee match and when the	See claim elements [1c], [1d].

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match meets a public network classification criterion.	
92. The apparatus of claim 74 wherein said processor is further operably configured to cause the private network routing message or the public network routing message to be communicated to a call controller to effect routing of the call.	Verizon Wi-Fi Calling causes the private network routing message or the public network routing message to be communicated to a call controller to effect routing of the call.
93. [93p] A call routing controller apparatus for establishing a call between a caller and a callee in a communication system, the apparatus comprising:	Verizon Wi-Fi Calling establishes a call between a caller and a callee in a communication system. See claim element [1p].
[93a] means for accessing a database of caller dialing profiles wherein each dialing profile associates a plurality of calling attributes	See claim element [74b].

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Claim	Accused Device/Instrumentality
with a respective subscriber, to locate a dialing profile associated with the caller, in response to initiation of a call by a calling subscriber; and	
[93b] means for producing a private network routing message for receipt by a call controller, said private network routing message identifying an address, on a private network, through which the call is to be routed,	See claim element [74c].
[93c] when at least one of said calling attributes and at least a portion of a callee identifier associated with the callee match and when the match meets a private network classification criterion, the address being associated with the callee; and	See claim element [74d].

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[93d] means for producing a public network routing message for receipt by a call controller, said public network routing message identifying a gateway to a public network	See claim element [74e].
[93e] when at least one of said calling attributes and said at least said portion of said callee identifier associated with the callee match and when the match meets a public network classification criterion.	See claim element [74f]
111. The apparatus of claim 93 further comprising means for causing the private network routing message or the public network routing message to be communicated to a call controller to effect routing of the call.	Verizon Wi-Fi Calling comprises means for causing the private network routing message or the public network routing message to be communicated to a call controller to effect routing of the call.

ALVERSON, TAYLOR, MORTENSEN & SANDERS

LAWYERS

7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000

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