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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 F

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 AT&T ENTITIES**

25 Defendants.

CHART 3 TO EXHIBIT F

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

26 AT&T, Inc. and AT&T Corp. (collectively, "AT&T") support a Wi-Fi based calling platform
27 ("AT&T Wi-Fi Calling") that includes mobile devices, software running on such devices and servers
28 operated by AT&T that allows calls to be placed over Wi-Fi networks. AT&T practices certain
claims of U.S. Patent 8,542,815 ("the '815 patent") as illustrated in the chart below.


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AT&T Wi-Fi Calling allows a mobile device to initiate a call between a caller and a callee using a carrier assisted voice over IP (“VoIP”) system and the callee may be an AT&T subscriber or a non-subscriber. A profile that includes calling attributes is used as part of the process that classifies a call.

This chart applies claims 1, 7, 27, 28, 34, 54, 72 – 74, 92, 93 and 111 of the ‘815 Patent to AT&T Wi-Fi Calling.


U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
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>AT&T 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>AT&T supports Wi-Fi Calling on desktop, tablet and mobile devices including iPhone and Apple Watch devices.</p> <p>BENEFITS A new way to keep the conversation going</p> <ul style="list-style-type: none"> • Wi-Fi Calling is easy to set up and use. • Once you set up Wi-Fi Calling, your phone automatically detects when to use it. Wi-Fi Calling is only used if your cellular coverage is weak or not available. • It works with your AT&T mobile number and compatible device—no new number or app required. <p>COMPATIBILITY Devices that support Wi-Fi Calling We're proud to offer Wi-Fi Calling on iPhone, the phone that's absolutely beautiful and simple to use. Enjoy Wi-Fi Calling on these models**:</p> <ul style="list-style-type: none"> • iPhone 6s • iPhone 6s Plus • iPhone 6 • iPhone 6 Plus <p>**iOS 9 must be installed.</p>

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U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
	<p>AT&T Wi-Fi Calling allows Mac desktop computers, iPads, iPhones and Apple Watches connected to a Wi-Fi network to place calls to other users.</p> <p>AT&T Wi-Fi Calling uses a call routing controller that includes AT&T operated equipment.</p> <p>AT&T Wi-Fi Calling utilizes 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>AT&T 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 mobile device beginning with the establishment of communication between the device and a server operated by AT&T. The caller identifier includes a phone number associated with the caller. The callee identifier includes a phone number associated with the callee.</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>AT&T 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 information stored on AT&T servers, and/or information obtained regarding the connection of the caller device to the network.</p> 
[1c] determining a match when at least one of said calling attributes matches at least a portion of said callee identifier;	<p>AT&T 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>AT&T Wi-Fi Calling matches at least one of the calling attributes and at least a portion of the callee identifier in interpreting the callee identifier.</p>


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Claim	Accused Device/Instrumentality
<p>[1d] 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;</p>	<p>AT&T 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 classification criteria.</p> <p>AT&T Wi-Fi Calling allows calls to be made using AT&T's private network and over a public network such as the PSTN. Private network classification criteria represents routing calls over AT&T's private network. Public network classification criteria represents routing calls over a public network such as the PSTN. Calling attributes are used to establish a private and public network classification criteria.</p> <p>One example of calling attributes being used to establish private and public network classification criteria is the use of caller related information to interpret the callee identifier. 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 AT&T Wi-Fi Calling.</p> <p>* When cellular service is available, your iPhone uses it for emergency calls. If you turned on Wi-Fi Calling service isn't available, emergency calls might use Wi-Fi calling. Emergency calls might send your device's information to help emergency workers find you, regardless of whether you turn on Location Services.</p>  <p>The Apple setup screen indicates that "For short code calls, the city will be sent for call routing purpose."</p>

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Claim	Accused Device/Instrumentality
	
<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 message identifying an address, on the private network, associated with the callee;</p>	<p>AT&T 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 AT&T operated controller routes the call using a routing message to its own subscriber over its private network.</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>AT&T 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 a public network, the AT&T operated controller routes the call using a routing message to a gateway associated with a public network such as the PSTN.</p>

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Claim	Accused Device/Instrumentality
7. The process of claim 1 further comprising formatting said callee identifier into a pre-defined digit format to produce a re-formatted callee identifier.	AT&T Wi-Fi Calling formats said callee identifier into a pre-defined digit format to 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.	AT&T 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	See claim element [1a].

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U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
<p>callee identifier;</p>	
<p>[27b] locating a caller dialing profile comprising a username associated with the caller and a plurality of calling attributes associated with the caller;</p>	<p>See claim element [1b].</p>
<p>[27c] determining a match when at least one of said calling attributes matches at least a portion of said callee identifier;</p>	<p>See claim element [1c].</p>
<p>[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;</p>	<p>See claim element [1d].</p>
<p>[27e] when the call is classified as a private network call,</p>	<p>See claim element [1e].</p>

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U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
producing a private network routing message for receipt by a call controller, said private network routing message 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	AT&T 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].

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Claim	Accused Device/Instrumentality
comprising:	
[28a] receiving means for receiving a caller identifier and a callee identifier, in response to initiation of a call by a calling subscriber;	See claim element [1a].
[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	See claim element [1d].

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Claim	Accused Device/Instrumentality
classifying the call as a private network call when said match meets private network classification criteria;	
[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	See claim element [1e].
[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.	See claim element [1f].
34. The	See claim 7.

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Claim	Accused Device/Instrumentality
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.	
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:	AT&T 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 associated with the caller; and	See claim element [1b].
[54b] when at least one of said calling attributes and at least a portion of a	See claim elements [1c], [1d].

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Claim	Accused Device/Instrumentality
callee identifier associated with the callee match and when the match meets a private network classification criterion,	
[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 classification criterion,	See claim elements [1c], [1d].
[54e] producing a public network routing message for receipt by a call controller,	See claim element [1f].

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Claim	Accused Device/Instrumentality
<p>said public network routing message identifying a gateway to a public network.</p>	
<p>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.</p>	<p>AT&T 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.</p>
<p>73. A non-transitory computer readable medium encoded with codes for directing a processor to execute the method of claim 54.</p>	<p>AT&T Wi-Fi Calling includes a non-transitory computer readable medium encoded with codes for directing a processor to execute the method of claim 54.</p> <p>See claim elements [54p], [54a], [54b], [54c], [54d] and [54e].</p>
<p>74. [74p] A call routing controller apparatus for establishing a call between a caller and a callee in a communication system, the</p>	<p>AT&T Wi-Fi Calling includes a call routing controller apparatus for establishing a call between a caller and a callee in a communication system.</p> <p>See claim clement [1p].</p>

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Claim	Accused Device/Instrumentality
apparatus comprising:	
[74a] a processor operably configured to:	AT&T Wi-Fi Calling includes of multiple machines with processors at multiple AT&T 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;	AT&T 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 private network, through which the call is to be routed,	See claim element [1e].
[74d] when at least one of said calling attributes	See claim elements [1c], [1d].

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Claim	Accused Device/Instrumentality
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	
[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 match meets a public network classification criterion.	See claim elements [1c], [1d].
92. The apparatus of claim 74 wherein	AT&T 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.

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Claim	Accused Device/Instrumentality
<p>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.</p>	
<p>93. [93p] A call routing controller apparatus for establishing a call between a caller and a callee in a communication system, the apparatus comprising:</p>	<p>AT&T Wi-Fi Calling establishes a call between a caller and a callee in a communication system.</p> <p>See claim element [1p].</p>
<p>[93a] means for accessing 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</p>	<p>See claim element [74b].</p>

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Claim	Accused Device/Instrumentality
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].
[93d] means for producing a public network routing message for receipt by a call controller, said public network routing	See claim element [74e].

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Claim	Accused Device/Instrumentality
message identifying a gateway to a public network	
[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.	AT&T 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.