

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](mailto:efile@alversontaylor.com)  
11 *Attorneys for Plaintiff*

12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 \* \* \*

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

CASE NO.:

16 Plaintiff,

17 v.

**CHART 2 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 2 TO EXHIBIT E**

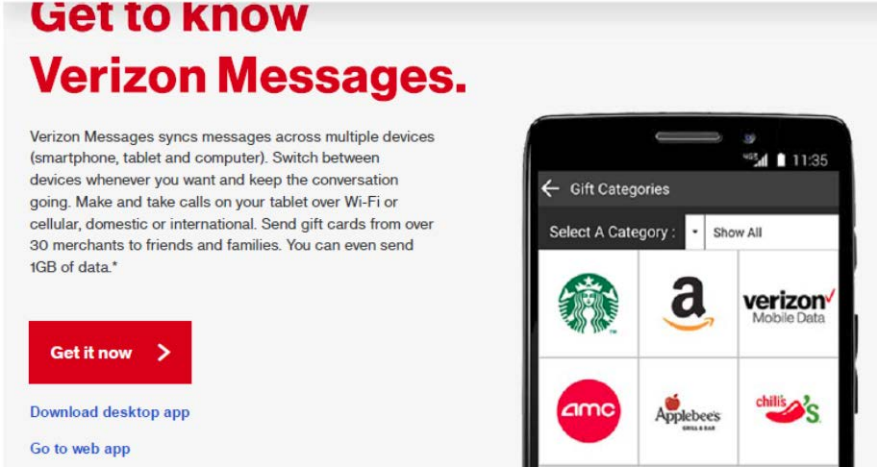
27 **CHART SUPPORTING ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS  
28 CONCERNING U.S. PATENT NO. 8,542,815**

Verizon Wireless Services, Inc. and Verizon Communications, Inc. (collectively, “Verizon”) support and operate a messaging platform (the “Verizon Messaging System”) that includes desktop computers, laptops, tablets and mobile devices, software applications running on such devices and

1 servers operated by Verizon. The Verizon Messaging System allows smartphone and desktop users  
 2 to send messages including text, images, video and audio to others. Verizon practices certain claims  
 3 of U.S. Patent 8,542,815 (“’815 Patent”) as illustrated in the chart below.

4 The Verizon Messaging System allows devices to initiate a communication between a caller  
 5 and a callee, which may be n Verizon subscriber or a non-subscriber. A profile that includes  
 6 attributes is used as part of the process that classifies a call.

7 This chart applies claims 1, 7, 27, 28, 34, 54, 72 – 74, 92, 93 and 111 of the ‘815 Patent to  
 8 the Verizon Messaging System.

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>The Verizon Messaging System 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 offers messaging services through its Verizon Messages application, which is available for smartphone platforms including Android and iOS as well as desktop computers including those running Windows and MacOS.</p>  <p>Verizon Messages allows smartphones to send messages including text, audio, video and images to other smartphone users, including both Verizon subscribers and to non-subscribers.</p> <p>The Verizon Messaging System uses a call routing controller that includes</p>

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
	<p>the caller device and/or Verizon servers.</p> <p>The Verizon Messaging System utilizes a plurality of nodes with which callers and callees are associated.</p>
<p>[1a] in response to initiation of a call by a calling subscriber, receiving a caller identifier and a callee identifier;</p>	<p>The Verizon Messaging System receives a caller identifier and a callee identifier in response to initiation of a call by a calling subscriber.</p> <p>In the Verizon Messaging System the caller identifier includes a phone number associated with the caller. A message is initiated by the Messages application. The message initiation includes information associated with the recipient based on the contact list of the smartphone, or entered by the user. The callee identifier includes a phone number associated with the recipient.</p>
<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>	<p>The Verizon Messaging System 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 calling profile is located by the Verizon server based on a phone number of the caller, or on the calling device. Calling attributes include information used in the classification of a call, such as settings stored on the local device, information stored on the carrier servers, and/or information obtained regarding the connection of the local device to the network.</p>
<p>[1c] determining a match when at least one of said calling attributes matches at least a portion of said callee identifier;</p>	<p>The Verizon Messaging System determines a match when at least one of said calling attributes matches at least a portion of said callee identifier.</p> <p>The Verizon Messaging System matches at least one of the calling attributes and at least a portion of the callee identifier in processing the callee identifier.</p>
<p>[1d] classifying the call as a public network call when said match meets public network</p>	<p>The Verizon Messaging System 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>The Verizon Messaging System allows messages to be sent over Verizon's</p>

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
classification criteria and classifying the call as a private network call when said match meets private network classification criteria;	<p>private network and over non-Verizon networks. Private network classification criteria represents routing the message using Verizon's private network. Public network classification criteria represents routing the message using non-Verizon networks. Calling attributes are used to establish private and public network classification criteria.</p> <p>An example of calling attributes being used to establish private and public network classification criteria is the use of caller information to interpret the callee identifier. For example, if the callee identifier is an international phone number with international dialing digits (IDD) or national dialing digits (NDD) prepended, information associated with the registered location of the caller and/or the physical location of the caller is used to determine how to reformat the callee identifier before it can be determined if the callee is a Verizon subscriber.</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>The Verizon Messaging System 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>In the case that the message is to be delivered over Verizon's private network a routing message is prepared for receipt by a call controller operated by Verizon.</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	<p>The Verizon Messaging System 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 message is sent using non-Verizon networks, the device running the Messages application and/or a Verizon server identifies a gateway to a non-Verizon network.</p>

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
message identifying a gateway to the public network.	
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.	The Verizon Messaging System 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, the method comprising:	The Verizon Messaging System 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	See claim element [1a].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
to initiation of a call by a calling subscriber, receiving a caller identifier and a callee identifier;	
[27b] 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].
[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].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
<p>[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 identifying an address, on the private network, associated with the callee; and</p>	<p>See claim element [1e].</p>
<p>[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.</p>	<p>See claim element [1f].</p>
<p>28. [28p] A call routing apparatus for facilitating communications between callers and callees in a system comprising a plurality of</p>	<p>The Verizon Messaging System 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.</p> <p>See claim element [1p].</p>

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
nodes with which callers and callees are associated, the apparatus 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	See claim element [1d].



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
network classification criteria;	
[28e] means for classifying the call as a private network call when said match meets private network classification criteria;	See claim element [1d].
[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	See claim element [1f].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
identifying a gateway to the public network.	
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:	The Verizon Messaging System and the carrier system 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].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
[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 classification criterion,	See claim elements [1c], [1d].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
[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.	The Verizon Messaging System 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.	The Verizon Messaging System include 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 controller apparatus for establishing a	The Verizon Messaging System and the carrier system include a call routing controller apparatus for establishing a call between a caller and a callee in a communication system.  See claim clement [1p].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
call between a caller and a callee in a communication system, the apparatus comprising:	
[74a] a processor operably configured to:	The Verizon Messaging System and the carrier system consists 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	The Verizon Messaging System and the carrier system 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	See claim element [1e].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
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 match meets a public network classification	See claim elements [1c], [1d].

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
<p>critrion.</p>	
<p>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.</p>	<p>The Verizon Messaging System 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.</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>The Verizon Messaging establishes a call between a caller and a callee in a communication system.</p> <p>See claim clement [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</p>	<p>See claim element [74b].</p>

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
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].
[93d] means for producing a public network	See claim element [74e].



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

U.S. Patent No. 8,542,815	
Claim	Accused Device/Instrumentality
routing message for receipt by a call controller, said public network routing 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.	The Verizon Messaging System 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.