# EXHIBIT 1

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EVIDENCE INDEX:

## MATTERS FOR JUDICIAL NOTICE AND PROFFERS OF EVIDENCE
### APPENDICES A THROUGH H


VoIP-Pal.com, Inc. v. Apple Inc. et al.
No. 1:25-cv-01843-RDM (D.D.C.)


Submitted in Support of Plaintiff's Opposition to Defendants' Motion to Dismiss


## I. PURPOSE AND SCOPE

This Evidence Index compiles publicly available materials and proffered internal records relevant to Plaintiff's Opposition to Defendants' Motion to Dismiss. Materials cited herein fall into the following categories:

> (a) Publicly available materials on the internet, requiring no discovery to obtain or authenticate;
>
> (b) Official records of federal agencies (USPTO, SEC, PTAB);
>
> (c) Materials archived by the Internet Archive's Wayback Machine, a neutral third-party archival service;
>
> (d) Records of proceedings before this Court or related proceedings; and
>
> (e) Internal business records proffered with a supporting declaration, for which Plaintiff may seek leave to introduce.

Items marked with [JN] are submitted for judicial notice under Federal Rule of Evidence 201. Items marked with [IA] are preserved in the Internet Archive and are independently verifiable. Items marked with [SEC] are public SEC/OTC filings. Items marked with [PTAB] are public records of the U.S. Patent Trial and Appeal Board. Items marked with [USPTO] are public records of the U.S. Patent and Trademark Office. Items marked with [PROFFER] are internal business records proffered as evidence of commercial activity; introduction is subject to leave of Court and a supporting declaration.

Appendix Structure:
• Appendix A — Digifonica/Nokia/JustCallMe Commercialization Evidence (2004–2008)
• Appendix B — PointsPhone Commercialization Evidence (2010–2013)
• Appendix C — PlatinumPhone Commercialization Evidence (2012–2015)
• Appendix D — Pre-Litigation Outreach and Technology Partnership Proposals (2014–2018)
• Appendix E — Inter Partes Review (IPR) Proceedings and Ex Parte Reexaminations
• Appendix F — Apple iOS Public Record Materials
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• Appendix H — Samsung Android Public Record Materials

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# APPENDIX A

## DIGIFONICA / NOKIA / JUSTCALLME

## COMMERCIALIZATION EVIDENCE (ca. 2008)

## II. Purpose

Appendix A documents the commercialization activities of Digifonica (International) Limited, VoIP-Pal's predecessor technology company, focusing on the JustCallMe VoWiFi service and the Nokia OEM partnership.

## A. Internal Records [PROFFER]

### A-1 — Nokia Corporation Commercial Agreement (December 2007–February 2008) [PROFFER]

**Source:** Commercially signed agreement (internal Nokia documents)
**Date:** December 2007 (signed); February 2008 (final signatures)
**Type:** Commercial OEM partnership agreement
**Description:** Signed agreement between Digifonica and Nokia Corporation for distribution of the "JustCallMe" Voice-over-WiFi (VoWiFi) application on Nokia handsets. Nokia conducted a formal Supplier Evaluation. Supporting documents include: Nokia Supplier Evaluation report; Nokia Solution Overview Memo; Nokia product roll-out plan; AnnexureA listing Nokia trial credentials; and the signed .sis application file (digifonica_1_00_nokia_signed.sis).
**Note:** Internal commercial documents proffered as evidence of commercial execution. Would require a supporting declaration for introduction. Not submitted for purposes of converting this motion into a motion for summary judgment.

## B. JustCallMe / Nokia VoWiFi Service — Public Evidence [IA] [JN]

### A-2 — VoIP Monitor: Digifonica VoIP "Just Call Me" Service Optimised for Nokia Devices (February 2008) [JN]

**Source:** VoIP Monitor (third-party trade press)
**Date:** February 12, 2008
**Type:** Third-party trade publication article
**Extracted URL:**
http://www.voipmonitor.net/2008/02/12/VoIP+Just+Call+Me+Service+Optimised+For+Nokia+Devices.aspx

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**Description:** Third-party trade press reporting the launch of Digifonica's "Just Call Me" VoIP service optimized for Nokia devices. The article states that Digifonica would be demonstrating the JustCallMe service at the Mobile World Congress event in Barcelona.

**Judicial Notice Basis:** Published third-party trade press article; existence and publication date are facts not subject to reasonable dispute.

### A-3 — JustCallMe.me.uk Home Page — Internet Telephone Systems (September 2008) [IA] [JN]

**Source:** Internet Archive / www.justcall.me.uk

**Date:** Archived September 18, 2008

**Type:** Archived consumer VoIP service website (Nokia WiFi solution, powered by Digifonica)

**Extracted URL:** https://web.archive.org/web/20080918015135/http://www.justcall.me.uk:80/

**Description:** Internet Archive capture of the JustCallMe home page showing a consumer VoIP service website powered by Digifonica. The site offered internet telephone services via Nokia WiFi handsets, with plan options, subscriber login, and an order/signup system. Footer: "Powered by Digifonica."

**Judicial Notice Basis:** Internet Archive capture of a publicly accessible website. Independently verifiable.

### A-4 — JustCallMe Features Page (September 2008) [IA] [JN]

**Source:** Internet Archive / www.justcall.me.uk

**Date:** Archived September 18, 2008

**Type:** Archived product features page

**Extracted URL:** https://web.archive.org/web/20080918075724/http://www.justcall.me.uk:80/content/services

**Description:** Internet Archive capture of the JustCallMe features/services page detailing the VoWiFi product's technical capabilities, powered by Digifonica's platform.

**Judicial Notice Basis:** Internet Archive capture; independently verifiable.

### A-5 — JustCallMe Plans Page (September 2008) [IA] [JN]

**Source:** Internet Archive / www.justcall.me.uk

**Date:** Archived September 18, 2008

**Type:** Archived service plans and pricing page

**Extracted URL:** https://web.archive.org/web/20080918075657/http://www.justcall.me.uk:80/content/plans

**Description:** Internet Archive capture of JustCallMe pricing plans page showing consumer subscription options with "Order Now" buttons linking to a checkout system. Plans included Pay As You Go, and unlimited minute plans starting from £5.99.

**Judicial Notice Basis:** Internet Archive capture; independently verifiable.

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### A-6 — JustCallMe Rates Page (September 2008) [IA] [JN]

**Source:** Internet Archive / www.justcall.me.uk
**Date:** Archived September 18, 2008
**Type:** Archived international calling rates page
**Extracted URL:**
https://web.archive.org/web/20080918075717/http://www.justcall.me.uk:80/content/rates
**Description:** Internet Archive capture of JustCallMe international calling rates page, with a downloadable rate card PDF.
**Judicial Notice Basis:** Internet Archive capture; independently verifiable.

### A-7 — JustCallMe FAQ Page (September 2008) [IA] [JN]

**Source:** Internet Archive / www.justcall.me.uk
**Date:** Archived September 18, 2008
**Type:** Archived FAQ/support page
**Extracted URL:**
https://web.archive.org/web/20080918075653/http://www.justcall.me.uk:80/content/faq
**Description:** Internet Archive capture of the JustCallMe FAQ page with technical support documentation covering Nokia handset configuration, WiFi connectivity, softphone installation, account management, and troubleshooting.
**Judicial Notice Basis:** Internet Archive capture; independently verifiable.

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# APPENDIX B

## POINTSPHONE COMMERCIALIZATION EVIDENCE (ca. 2010–2013)

### III. Purpose

Appendix B documents PointsPhone, VoIP-Pal's first proprietary retail VoIP service, which was publicly available on Apple's iTunes App Store and through the PointsPhone.com website.

### A. Internet Archive Evidence — App Store Listings [IA] [JN]

### B-1 — PointsPhone Mobile on Apple iTunes App Store (June 2010) [IA] [JN]

**Source:** Internet Archive / Apple iTunes App Store
**Date:** App released June 13, 2010; archived August 9, 2010
**Type:** Archived app store listing
**Extracted URL:**
https://web.archive.org/web/20100809084153/http://itunes.apple.com:80/us/app/pointsphone-mobile/id376011131
**Description:** PointsPhone Mobile listed on Apple's iTunes App Store. Seller: "PointsPhone Inc." The app description states: "PointsPhone Mobile is a VoiP application that allows economical international calls on the iPhone." Features: "Connectivity through WIFI, 3G, EDGE and GPRS." Free download with $10 account activation.
**Judicial Notice Basis:** Internet Archive capture of a publicly available app store listing. Independently verifiable.

### B. Press Releases and Trade Press [JN]

### B-2 — PointsPhone Platinum Suite Launch — VoIP Monitor (April 2011) [JN]

**Source:** VoIP Monitor (third-party trade press)
**Date:** April 11, 2011
**Type:** Third-party trade publication article
**Extracted URL:**
http://www.voipmonitor.net/2011/04/11/VoipPalCom+Announces+The+Launch+Of+Its+New+PointsPhone+Platinum+Suite+Which+Includes+An+Antivirus+Program+For+North+America+Android+Users.aspx
**Description:** Third-party trade press reporting VoIP-Pal's launch of the "PointsPhone Platinum Suite" including an antivirus program for Android, available at $29.95.
**Judicial Notice Basis:** Published third-party trade press.

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### B-3 — PointsPhone Debt Reduction and Revenue Operations — VoIP Monitor (September 2011) [JN]

**Source:** VoIP Monitor (third-party trade press)

**Date:** September 12, 2011

**Type:** Third-party trade publication

**Extracted URL:**
http://www.voipmonitor.net/2011/09/12/VoipPalCom+Reduces+Debt+By+30.aspx

**Description:** Third-party report on VoIP-Pal reducing debt by 30% and plans to resume revenue-producing operations through PointsPhone and VoIP apps for iPhone and Android.

**Judicial Notice Basis:** Published third-party trade press.

### B-4 — VoIP-Pal Beta Testing Complete — VoIP Monitor (September 2011) [JN]

**Source:** VoIP Monitor (third-party trade press)

**Date:** September 27, 2011

**Type:** Third-party trade publication article

**Extracted URL:**
http://www.voipmonitor.net/2011/09/27/VoipPal+Successfully+Completes+Beta+Testing+On+Its+PointsPhoneCom+Website.aspx

**Description:** Third-party trade press reporting VoIP-Pal's completion of beta testing on PointsPhone.com. Also noted mobile apps for Android, iPhone, and Blackberry.

**Judicial Notice Basis:** Published third-party trade press.

### B-5 — PointsPhone India Expansion — EDN.com (October 2011) [JN]

**Source:** EDN.com (third-party technology press)

**Date:** October 7, 2011

**Type:** Third-party technology publication

**Extracted URL:** https://www.edn.com/voip-pal-com-inc-opening-new-sales-channels-to-india/

**Description:** Third-party technology press reporting VoIP-Pal opening new sales channels to India through licensing agreements with RupeeChat.com and RupeePhone.com.

**Judicial Notice Basis:** Published third-party technology press.

### B-6 — PointsPhone Mobile v3.01 on Apple App Store (November 2011) [IA] [JN]

**Source:** Internet Archive / Apple App Store

**Date:** Archived November 2, 2011

**Type:** Archived app store listing

**Extracted URL:**
https://web.archive.org/web/20111102100256/http://itunes.apple.com:80/us/app/pointsphone-mobile/id376011131

**Description:** Updated version (v3.01) of PointsPhone Mobile on Apple's App Store. Same core features with connectivity through WiFi, 3G, EDGE and GPRS. Now showing 15+ supported languages. Demonstrates continued availability over an 18+ month period.

**Judicial Notice Basis:** Internet Archive capture of app store listing.

### B-7 — PRNewswire: VoIP-Pal Completes Beta Testing of Digifonica Soft Switch (August 2012) [JN]

**Source:** PRNewswire (major wire service)

**Date:** August 9, 2012

**Type:** Major wire service press release

**Extracted URL:** https://www.prnewswire.com/news-releases/voip-palcom-inc-completes-successful-beta-test-of-soft-switch-voip-network-framework-165566356.html

**Description:** PRNewswire press release confirming VoIP-Pal "completed initial beta testing of its proprietary and leading edge intelligent 'Soft Switch' VoIP network framework and five specific patents acquired from Digifonica." The release footer includes a description of PointsPhone Mobile as a VoIP application for iPhone and Android phones.

**Judicial Notice Basis:** Major wire service press release; existence and content are facts not subject to reasonable dispute.

### C. Internet Archive Evidence — Website [IA]

### B-8 — PointsPhone.com Website (June 2013) [IA]

**Source:** Internet Archive / PointsPhone.com

**Date:** Archived June 19, 2013

**Type:** Archived website

**Extracted URL:** https://web.archive.org/web/20130619005738/http://pointsphone.com/

**Description:** PointsPhone.com website captured by Internet Archive showing rate tables, PayPal processing integration, and active service offerings.

**Judicial Notice Basis:** Internet Archive capture; independently verifiable.

### B-9 — PointsPhone.com "Cell Over IP" Feature (November 2013) [IA]

**Source:** Internet Archive / PointsPhone.com

**Date:** Archived November 26, 2013

**Type:** Archived website

**Extracted URL:**
https://web.archive.org/web/20131126010402/http://pointsphone.com/coip.asp

**Description:** PointsPhone.com website showing "Cell Over IP" (COIP) feature and continued service availability through late 2013.

**Judicial Notice Basis:** Internet Archive capture.

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**B-10 — YouTube Advertisement: PointsPhone [IA]**

    **Source:** YouTube
    **Type:** Promotional video
    **Extracted URL:** https://www.youtube.com/watch?v=-vSnIpCsnS0
    **Description:** YouTube promotional video advertising the PointsPhone VoIP service.
    **Judicial Notice Basis:** Public YouTube video with verifiable upload date.

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# APPENDIX C

## PLATINUMPHONE COMMERCIALIZATION EVIDENCE (ca. 2012–2015)

### IV. Purpose

Appendix C documents PlatinumPhone, VoIP-Pal's second retail VoIP service launched in October 2012 after acquiring and integrating Digifonica's technology. PlatinumPhone was publicly available on the Google Play Store, with a functioning e-commerce website, and was marketed through YouTube.

### A. Press Release — Service Launch [JN]

### C-1 — PRNewswire: PlatinumPhone.com Launch (October 2012) [JN]
   **Source:** PRNewswire
   **Date:** October 22, 2012
   **Type:** Major wire service press release
   **Extracted URL:** https://www.prnewswire.com/news-releases/voip-palcom-inc-launches-wwwplatinumphonecom-175224221.html
   **Description:** PRNewswire press release announcing public launch of PlatinumPhone.com, stating that "recently acquired patents from Digifonica Gibraltar have been successfully integrated" into a "highly scalable and proprietary VoIP softswitch platform."
   **Judicial Notice Basis:** Major wire service press release.

### B. Internet Archive Evidence — PlatinumPhone [IA] [JN]

### C-2 — PlatinumPhone.com Home Page (September 2013) [IA] [JN]
   **Source:** Internet Archive / PlatinumPhone.com
   **Date:** Archived September 14, 2013
   **Type:** Archived website
   **Extracted URL:**
   https://web.archive.org/web/20130914181436/http://www.platinumphone.com:80/
   **Description:** Internet Archive capture of PlatinumPhone.com home page showing a consumer VoIP service website.
   **Judicial Notice Basis:** Internet Archive capture; independently verifiable.

### C-3 — PlatinumPhone Description: "System powered by Voip-Pal.Com" (June 2013) [IA] [JN]

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**Source:** Internet Archive / VOIP-PAL.COM
**Date:** Archived June 9, 2013
**Type:** Archived product description
**Extracted URL:** https://web.archive.org/web/20130609151740/http://www.voip-pal.com:80/Platinumphone.asp
**Description:** VoIP-Pal's website described PlatinumPhone as "based upon a Voip-Pal owned proprietary softswitch Framework that is designed to integrate Voip-Pal's Patent Applications." Footer reads "System powered by Voip-Pal.Com network systems."
**Judicial Notice Basis:** Archived website content; independently verifiable.

### C-4 — PlatinumPhone on Google Play Store (December 2013) [IA] [JN]

**Source:** Internet Archive / Google Play Store
**Date:** Archived December 11, 2013 (app released October 11, 2012)
**Type:** Archived app store listing
**Extracted URL:**
https://web.archive.org/web/20131211002351/https://play.google.com/store/apps/details?id=com.platinumPhone
**Description:** PlatinumPhone Mobile app listed on the Google Play Store. Developer: "PlatinumPhone." App description: "PlatinumPhone Mobile is a VoIP application that allows economical international calls on the Android." Features: "Connectivity through WIFI, 3G, EDGE and GPRS." Free with $10 activation. Virtual Numbers, Call Forwarding, DID numbers. Android 2.3+.
**Judicial Notice Basis:** Internet Archive capture of an app store listing.

### C-4b — Additional PlatinumPhone Internet Archive Captures [IA] [JN]

The following additional Internet Archive captures document various pages of the PlatinumPhone.com website and service:

Description: PlatinumPhone — Download Free Smartphone App (November 2, 2013)
Extracted URL:
https://web.archive.org/web/20131102161923/http://platinumphone.com/plans/show/10

Description: PlatinumPhone — Latest News (November 2, 2013)
Extracted URL:
https://web.archive.org/web/20131102180949/http://platinumphone.com/content/news_room

Description: PlatinumPhone — Start Making Calls ($10 registration) (November 2, 2013)
Extracted URL:
https://web.archive.org/web/20131102171019/http://platinumphone.com/plans/show/8

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Description: VOIP-PAL.COM — VP Inc Begins Process to Become Fully Reporting (November 28, 2012)
Extracted URL: https://web.archive.org/web/20121128095512/http://www.voip-pal.com:80/news_may29_2012.asp

Description: VOIP-PAL.COM — VP Inc Launches PlatinumPhone (May 8, 2013)
Extracted URL: https://web.archive.org/web/20130508002229/http://www.voip-pal.com:80/news_jan28_2013.asp

Description: VOIP-PAL.COM — PRNewswire Update re Patent Pending Applications (May 8, 2013)
Extracted URL: https://web.archive.org/web/20130508002235/http://www.voip-pal.com/news_mar19_2013.asp

### C-5 — **PlatinumPhone Order Bundle Page (January 2014) [IA] [JN]**

**Source:** Internet Archive / PlatinumPhone.com
**Date:** Archived January 9, 2014
**Type:** Archived e-commerce page
**Extracted URL:**
https://web.archive.org/web/20140109032137/https://platinumphone.com/secure/order_bundle
**Description:** Functioning e-commerce order system with a five-step checkout: Plan Options, Dialling Profile, Additional Funds, Billing & Shipping, Order Summary. Products: "Start making calls using PlatinumPhone" ($10.00), "Platinum Antivirus Suite" ($29.95), "Download Free Smartphone App" ($0.00). Credit card logos (Visa, MasterCard, Discover, JCB), SSL encryption, multi-platform downloads (iOS, Android, Blackberry, Windows). Footer: "System powered by Voip-Pal.Com network systems."
**Judicial Notice Basis:** Internet Archive capture of a functioning e-commerce page. Independently verifiable.

### C-6 — **YouTube Promotional Video: PlatinumPhone (October 2012) [JN]**

**Source:** YouTube (uploaded by "ThePlatinumPhone")
**Date:** October 16, 2012
**Type:** Promotional video advertisement
**Extracted URL:** https://www.youtube.com/watch?v=tej4_DWQiZ8&t=31s
**Description:** YouTube promotional video advertising VoIP-Pal's PlatinumPhone product. Shows PlatinumPhone.com website with product tiers, platform icons (iOS, Android, BlackBerry), and "System powered by Voip-Pal.Com network systems" footer. Promotional video shows a copy of the PlatinumPhone website with the $10 sign-up fee.
**Judicial Notice Basis:** Public YouTube video with verifiable upload date.

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# APPENDIX D

## PRE-LITIGATION OUTREACH AND TECHNOLOGY PARTNERSHIP PROPOSALS
## (2014–2018)

## (PROFFERED INTERNAL RECORDS — DECLARATION REQUIRED)

### V. Purpose

Appendix D catalogs VoIP-Pal's pre-litigation outreach campaign to major technology companies and carriers. The outreach is offered to show that VoIP-Pal pursued non-litigation alternatives before filing suit. All items in Appendix D are proffered as evidence of pre-litigation conduct; introduction is subject to leave of Court and a supporting declaration.

> **Note:** This appendix documents the existence, timing, and general nature of pre-litigation outreach contacts. The descriptions below do not disclose the substance of any settlement communications and are not offered for any purpose barred by Federal Rule of Evidence 408.

### A. Apple Engagement (2014–2015) [PROFFER]

### D-1 — Apple Pre-Litigation Engagement
**Source:** Internal correspondence
**Date:** Approximately March 2014 through December 2015
**Type:** Investment bank-mediated engagement and direct correspondence
**Description:** VoIP-Pal, through an investment bank intermediary (Bois Capital), initiated contact with Apple regarding VoIP-Pal's patent portfolio and technology. Apple engaged in a lengthy dialogue over approximately this period before declining to pursue a transaction.
**Note:** Internal correspondence; requires declaration. Offered solely to establish the existence and duration of pre-litigation engagement.

### B. Samsung Engagement (November–December 2014) [PROFFER]

### D-2 — Samsung Pre-Litigation Engagement
**Source:** Internal correspondence and proposal document
**Date:** Approximately November through December 2014
**Type:** Technology partnership proposal
**Description:** VoIP-Pal submitted a comprehensive technology partnership proposal to Samsung's mobile division. The proposal encompassed patent/IP rights, systems and technology, implementation support, and operational expertise. Samsung executed a non-

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disclosure agreement in connection with the engagement. Samsung did not pursue a transaction.

**Note:** Internal correspondence; requires declaration. Offered solely to establish the existence and nature of pre-litigation engagement.


### C. Carrier Engagement (2014–2016) [PROFFER]


### D-3 — AT&T Pre-Litigation Engagement

**Source:** Internal correspondence
**Date:** Approximately July 2014 through January 2016
**Type:** Patent portfolio proposal and correspondence
**Description:** VoIP-Pal, through an intermediary (Cedar Band Corporation), submitted a patent portfolio proposal to AT&T. Correspondence continued over approximately this period. AT&T did not pursue a transaction.
**Note:** Internal correspondence; requires declaration. Offered solely to establish the existence and timing of pre-litigation engagement.


### D-4 — Verizon Pre-Litigation Engagement

**Source:** Internal correspondence
**Date:** Approximately July 2014 through November 2015
**Type:** Patent portfolio proposal, conference call, and correspondence
**Description:** VoIP-Pal submitted a patent portfolio proposal to Verizon. Verizon's intellectual property group held at least one conference call and conducted a review before declining.
**Note:** Internal correspondence; requires declaration. Offered solely to establish the existence and timing of pre-litigation engagement.


### D. Google Engagement (2015–2018) [PROFFER]


### D-5 — Google Pre-Litigation Engagement (Phase 1: 2015–2016)

**Source:** Internal correspondence, email communications, and Google Patent Opportunity Submission portal records
**Date:** Approximately November 2015 through October 2016
**Type:** Patent portfolio proposal, multiple conference calls, NDA negotiation, and acquisition discussions
**Description:** VoIP-Pal, through an intermediary, initiated contact with Google's patent counsel via Google's Patent Opportunity Submission portal. Google's patent counsel agreed to evaluate the submission and engaged in due diligence. Over approximately the following eleven months, the parties held multiple conference calls and exchanged extensive correspondence regarding a potential patent acquisition. Google provided a proposed NDA in

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May 2016; the parties exchanged redlined drafts and held further calls to resolve NDA terms. Discussions concluded in October 2016 without a transaction.

**Note:** Internal correspondence; requires declaration. Offered solely to establish the existence, duration, and general nature of pre-litigation engagement. Google's Patent Opportunity Submission portal terms and conditions are included in the source document.

### D-6 — Google Pre-Litigation Engagement (Phase 2: 2018)

**Source:** Internal correspondence and email communications

**Date:** Approximately August 2018

**Type:** Renewed acquisition discussions

**Description:** VoIP-Pal, through an intermediary, renewed contact with Google's patent counsel to discuss a potential acquisition of VoIP-Pal. Google's counsel indicated availability and a willingness to have a substantive discussion. Call scheduling was underway as of late August 2018.

**Note:** Internal correspondence; requires declaration. Offered solely to establish the existence and timing of renewed pre-litigation engagement.

### E. Summary of All Pre-Litigation Outreach [PROFFER]

### D-7 — Comprehensive Summary of Pre-Litigation Outreach

**Date:** 2014–2018

**Type:** Summary of outreach to multiple entities

**Description:** Over a multi-year period before and after filing suit, VoIP-Pal conducted outreach to the following entities: Apple; Samsung; Google; Verizon; AT&T; T-Mobile; Facebook; Microsoft; Amazon; and News Corporation. VoIP-Pal's engagement with Google extended from approximately November 2015 through at least August 2018.

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# APPENDIX E

## INTER PARTES REVIEW (IPR) PROCEEDINGS AND EX PARTE REEXAMINATIONS

## (PUBLIC RECORDS OF THE USPTO/PTAB)

## VI. Purpose

Appendix E catalogs all Inter Partes Review (IPR) proceedings filed against VoIP-Pal's patents before the U.S. Patent Trial and Appeal Board (PTAB), as well as ex parte reexamination proceedings before the USPTO. All proceedings are public records of a federal agency and are appropriate for judicial notice under FRE 201.

### A. IPR Proceedings — U.S. Patent No. 8,542,815 ('815 Patent) [PTAB] [JN]

| No. | Case No. | Petitioner | Filed | Decided | Outcome |
|---|---|---|---|---|---|
| 1 | IPR2016-01082 | Unified Patents | 05/27/2016 | 11/28/2016 | Institution Denied |
| 2 | IPR2016-01201 | Apple | 06/10/2016 | 12/11/2017 | Final Written Decision (VoIP-Pal prevailed) |
| 3 | IPR2017-01399 | Apple | 06/30/2017 | 01/09/2018 | Institution Denied |
| 4 | IPR2017-01382 | AT&T | 06/28/2017 | 01/09/2018 | Institution Denied |

### B. IPR Proceedings — U.S. Patent No. 9,179,005 ('005 Patent) [PTAB] [JN]

| No. | Case No. | Petitioner | Filed | Decided | Outcome |
|---|---|---|---|---|---|
| 5 | IPR2016-01198 | Apple | 06/10/2016 | 12/11/2017 | Final Written Decision (VoIP-Pal prevailed) |
| 6 | IPR2017-01398 | Apple | 06/30/2017 | 01/09/2018 | Institution Denied |
| 7 | IPR2017-01384 | AT&T | 06/28/2017 | 01/09/2018 | Institution Denied |
| 8 | IPR2017-01383 | AT&T | 06/28/2017 | 01/09/2018 | Institution Denied |

### C. IPR Proceedings — U.S. Patent No. 8,630,234 ('234 Patent — Mobile Gateway) [PTAB] [JN]

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| No. | Case No. | Petitioner | Filed | Decided | Outcome |
|-----|----------|-----------|-------|---------|---------|
| 9 | IPR2022-01072 | Google | 06/24/2022 | 01/03/2023 | Institution Denied |
| 10 | IPR2022-01073 | Google | 06/24/2022 | 01/03/2023 | Institution Denied |
| 11 | IPR2022-01078 | Amazon | 06/27/2022 | 01/03/2023 | Institution Denied |
| 12 | IPR2022-01079 | Amazon | 06/27/2022 | 01/03/2023 | Institution Denied |
| 13 | IPR2022-01231 | Meta | 07/29/2022 | 10/31/2022 | Terminated |
| 14 | IPR2022-01232 | Meta | 07/29/2022 | 10/31/2022 | Terminated |
| 15 | IPR2022-01390 | Samsung | 08/31/2022 | 11/30/2022 | Terminated |
| 16 | IPR2022-01391 | Samsung | 08/31/2022 | 11/30/2022 | Terminated |
| 17 | IPR2023-00638 | T-Mobile | 03/10/2023 | 09/08/2023 | Institution Denied |
| 18 | IPR2023-00639 | T-Mobile | 03/10/2023 | 09/08/2023 | Institution Denied |
| 19 | IPR2023-00647 | Google | 03/15/2023 | 06/15/2023 | Terminated |
| 20 | IPR2023-00648 | Google | 03/15/2023 | 06/15/2023 | Terminated |

## D. IPR Proceedings — U.S. Patent No. 10,880,721 ('721 Patent — Mobile Gateway) [PTAB] [JN]

| No. | Case No. | Petitioner | Filed | Decided | Outcome |
|-----|----------|-----------|-------|---------|---------|
| 21 | IPR2022-01074 | Google | 06/24/2022 | 01/03/2023 | Institution Denied |
| 22 | IPR2022-01075 | Google | 06/24/2022 | 01/03/2023 | Institution Denied |
| 23 | IPR2022-01080 | Amazon | 06/27/2022 | 01/03/2023 | Institution Denied |
| 24 | IPR2022-01081 | Amazon | 06/27/2022 | 01/03/2023 | Institution Denied |
| 25 | IPR2022-01234 | Meta | 07/29/2022 | 10/31/2022 | Terminated |
| 26 | IPR2022-01235 | Meta | 07/29/2022 | 10/31/2022 | Terminated |
| 27 | IPR2022-01392 | Samsung | 08/31/2022 | 11/30/2022 | Terminated |
| 28 | IPR2022-01393 | Samsung | 08/31/2022 | 11/30/2022 | Terminated |
| 29 | IPR2023-00640 | T-Mobile | 03/10/2023 | 09/08/2023 | Institution Denied |
| 30 | IPR2023-00641 | T-Mobile | 03/10/2023 | 09/08/2023 | Institution Denied |
| 31 | IPR2023-00649 | Google | 03/15/2023 | 06/15/2023 | Terminated |
| 32 | IPR2023-00650 | Google | 03/15/2023 | 06/15/2023 | Terminated |

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### E. IPR Proceedings — Continuation Patents [PTAB] [JN]

| No. | Case No. | Patent No. | Petitioner | Filed | Decided | Outcome |
|---|---|---|---|---|---|---|
| 33 | IPR2019-01003 | 9,537,762 | Apple | 05/24/2019 | 12/11/2019 | Institution Denied |
| 34 | IPR2019-01006 | 9,813,330 | Apple | 05/24/2019 | 12/11/2019 | Institution Denied |
| 35 | IPR2019-01008 | 9,826,002 | Apple | 05/24/2019 | 12/11/2019 | Institution Denied |
| 36 | IPR2019-01009 | 9,948,549 | Apple | 05/24/2019 | 12/11/2019 | Institution Denied |

### F. Ex Parte Reexaminations [USPTO] [JN]

### E-1 — Reexamination of U.S. Patent No. 10,218,606 ('606 Patent) — CONCLUDED

**Patent:** U.S. Patent No. 10,218,606 ("Producing routing messages for voice over IP communications")
**Type:** Ex Parte Reexamination
**Status:** CONCLUDED — Reexamination Certificate issued November 2023
**Result:** All 31 challenged claims CONFIRMED as patentable; 8 new claims also affirmed
**Source:** GlobeNewswire, November 20, 2023; USPTO Reexamination Certificate in record
**Judicial Notice Basis:** Public record of the U.S. Patent and Trademark Office.

### E-2 — Reexamination of U.S. Patent No. 8,630,234 ('234 Patent — Mobile Gateway) — PENDING

**Patent:** U.S. Patent No. 8,630,234 ("Mobile Gateway")
**Type:** Ex Parte Reexamination
**Status:** PENDING (as of March 2026)
**Judicial Notice Basis:** Public record of the USPTO. Verifiable through USPTO Patent Center.

### E-3 — Reexamination of U.S. Patent No. 10,880,721 ('721 Patent — Mobile Gateway) — PENDING

**Patent:** U.S. Patent No. 10,880,721 ("Mobile Gateway")
**Type:** Ex Parte Reexamination
**Status:** PENDING (as of March 2026)
**Judicial Notice Basis:** Public record of the USPTO.

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# APPENDIX F

## APPLE iOS — PUBLIC RECORD MATERIALS

## VII. Purpose

Appendix F documents Apple's OS-level telephony access controls and recent feature additions relevant to the architectural disparities between native carrier-integrated telephony and third-party VoIP applications on iOS. All items are drawn from Apple's own publicly available documentation and press materials. Items dated after the filing of the First Amended Complaint (September 21, 2025) are included as evidence of a continuing pattern.

### F-1 — Native Call Recording and AI Transcription (iOS 18.1, October 2024) [JN]

**Source:** Apple Support / apple.com
**Date:** October 2024 (iOS 18.1)
**Type:** Apple's own public documentation
**Extracted URLs:**

https://support.apple.com/guide/iphone/record-and-transcribe-a-call-iph57c6590e9/ios
https://support.apple.com/guide/iphone/use-apple-intelligence-in-phone-iph2571a9780/ios

**Description:** In iOS 18.1, Apple introduced built-in call recording directly into the native Phone app, using system-level audio capture capabilities.
**Judicial Notice Basis:** Apple's own public documentation; independently verifiable.

### F-2 — Live Voicemail with Carrier Integration (iOS 17, September 2023) [JN]

**Source:** Apple Newsroom and Support / apple.com
**Date:** September 2023 (iOS 17)
**Type:** Apple's own public documentation and press materials
**Extracted URLs:**

https://www.apple.com/newsroom/2023/09/ios-17-is-available-today/
https://support.apple.com/en-us/HT213877
https://support.apple.com/guide/iphone/listen-to-voicemail-iph3c99374c/ios

**Description:** In iOS 17, Apple introduced Live Voicemail, a Phone app feature that displays a real-time, on-device transcription of a voicemail as a caller leaves it.
**Judicial Notice Basis:** Apple's own public documentation; independently verifiable.

### F-3 — Call Screening (iOS 26, September 2025) [JN]

**Source:** Apple Support / apple.com
**Date:** September 2025 (iOS 26)
**Type:** Apple's own public documentation
**Extracted URLs:**

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https://support.apple.com/guide/iphone/screen-and-block-calls-iphe4b3f7823/ios
https://support.apple.com/en-us/123075
https://support.apple.com/guide/iphone/whats-new-in-ios-26-iphfed2c4091/26/ios/26

**Description:** In iOS 26, Apple introduced Call Screening as a system-level Phone app feature that automatically answers calls from unknown numbers and gathers the caller's name and reason for calling before the phone rings.

**Judicial Notice Basis:** Apple's own public documentation; independently verifiable.

### F-4 — Hold Assist (iOS 26, September 2025) [JN]

**Source:** Apple Support / apple.com
**Date:** September 2025 (iOS 26)
**Type:** Apple's own public documentation
**Extracted URLs:**

https://support.apple.com/en-me/guide/iphone/iph3c9951d7/ios
https://support.apple.com/en-my/guide/iphone/iph3c9951d7/26/ios/26

**Description:** In iOS 26, Apple introduced Hold Assist as a system-level Phone app feature that notifies the user when a live agent becomes available while on hold.

**Judicial Notice Basis:** Apple's own public documentation; independently verifiable.

### F-5 — eSIM Quick Transfer — Carrier Entitlement Activation (2022) [JN]

**Source:** Third-party technology publications
**Date:** 2022 (iOS 16)
**Type:** Published technology press
**Extracted URLs:**

https://www.1global.com/blog/enterprise/convenience-of-esim-quick-transfer-apple-for-enterprise
https://www.globalsecuritymag.com/ios-entitlements-and-esim-management-are-now-universally-available-to-all.html

**Description:** In iOS 16, Apple introduced an eSIM Quick Transfer feature utilizing a carrier's entitlement server for provisioning.

**Judicial Notice Basis:** Published technology press; independently verifiable.

### F-6 — eSIM Carrier Activation (2023–2024) [JN]

**Source:** Apple Support and third-party technology publications
**Date:** 2024 (iOS 17.4)
**Type:** Apple's own documentation and published press
**Extracted URLs:**

https://support.apple.com/en-us/118669
https://esimaccess.com/in-app-provisioning/

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**Description:** Apple introduced enhanced automatic eSIM activation with iOS 17.4, an exclusively carrier-controlled entitlement flow.

**Judicial Notice Basis:** Apple's own documentation; independently verifiable.

### F-7 — EU-Only Default Dialer App Entitlement (iOS 26, 2025) [JN]

**Source:** Apple Developer Documentation

**Date:** 2025 (iOS 26)

**Type:** Apple's own public developer documentation

**Extracted URL:**
https://developer.apple.com/documentation/bundleresources/entitlements/com.apple.developer.dialing-app

**Description:** In iOS 26, Apple introduced the com.apple.developer.dialing-app entitlement, which enables a third-party app to initiate carrier-based outgoing calls and access conversation history. Apple restricts this entitlement to the European Union; Apple's own documentation states that the developer account must be registered in the EU and the test device must be located within the EU.

**Judicial Notice Basis:** Apple's own developer documentation; independently verifiable.

### F-8 — Apple Newsroom Statement on DMA-Driven Changes to the EU (September 2025) [JN]

**Source:** Apple Newsroom

**Date:** September 2025

**Type:** Apple's own public press materials

**Extracted URL:** https://www.apple.com/newsroom/2025/09/the-digital-markets-acts-impacts-on-eu-users/

**Description:** Apple published a Newsroom article acknowledging that the Digital Markets Act has driven changes to iOS in the EU, including broader default app choices for calling and messaging.

**Judicial Notice Basis:** Apple's own public Newsroom article; independently verifiable.

### F-9 — Messages via Satellite (iOS 18, September 2024) — Native App Exclusive [JN]

**Source:** Apple Support / apple.com

**Date:** September 2024 (iOS 18)

**Type:** Apple's own public documentation

**Extracted URLs:**
https://support.apple.com/en-us/120930
https://support.apple.com/guide/iphone/text-via-satellite-iphb9262f4dd/ios
https://support.apple.com/en-us/105097

**Description:** In iOS 18, Apple introduced Messages via Satellite, allowing the native Messages app to send and receive iMessage and SMS texts when no cellular or Wi-Fi

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connection is available, via Apple's proprietary satellite infrastructure. This feature is exclusively available to Apple's native Messages app.

**Judicial Notice Basis:** Apple's own public documentation; independently verifiable.

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# APPENDIX G

## GOOGLE ANDROID — PUBLIC RECORD MATERIALS

### VIII. Purpose

Appendix G documents Google's Android platform telephony access controls and recent changes relevant to architectural disparities between native carrier-integrated telephony and third-party VoIP applications. All items are drawn from Google's own publicly available documentation, developer resources, and press materials. Items dated after the filing of the First Amended Complaint (September 21, 2025) are included as evidence of a continuing pattern.

### G-1 — Google Patches Pixel IMS Override (October 2025) [JN]

**Source:** Android Security Bulletin and third-party technology press
**Date:** October 2025
**Type:** Google's own security bulletin and published press
**Extracted URLs:**

https://source.android.com/docs/security/bulletin/pixel/2025-10-01
https://www.androidauthority.com/pixel-ims-broken-october-update-3606444/
https://startupnews.fyi/2025/10/11/google-blocks-hack-that-let-pixel-users-enable-volte-anywhere/
https://news.ycombinator.com/item?id=45553764
https://support.google.com/pixelphone/thread/391912589/december-update-broke-pixel-volte-in-foreign-countries
https://droidwin.com/google-patches-pixel-ims-app-heres-a-new-method-to-enable-volte/

**Description:** In its October 2025 security update, Google closed a method by which a non-carrier app could enable Wi-Fi Calling on Pixel phones for carriers not officially whitelisted by Google.
**Judicial Notice Basis:** Google's own security bulletin and published technology press; independently verifiable.

### G-2 — Google Bans Third-Party Call Recording Apps from Play Store (May 2022) [JN]

**Source:** Google Play Developer Policy Center
**Date:** Announced April 6, 2022; effective May 11, 2022
**Type:** Google's own policy documentation
**Extracted URLs:**

https://support.google.com/googleplay/android-developer/answer/10964491
https://support.google.com/googleplay/android-developer/answer/14554743
https://9to5google.com/2022/04/21/google-will-block-all-third-party-call-recording-apps-on-play-store-from-may-11/

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https://www.androidpolice.com/google-ends-call-recording-apps-accessibility-services/

**Description:** Google updated its Play Store developer policies to prohibit third-party apps from using the Accessibility API for call recording. Google's own pre-installed Phone app retains the ability to record calls through system-level APIs.

**Judicial Notice Basis:** Google's own policy documentation and published technology press; independently verifiable.

### G-3 — Android 14/15: Full-Screen Intent Restrictions (2023–2025) [JN]

**Source:** Android Developer Documentation

**Date:** October 2023 (Android 14); Google Play enforcement effective January 22, 2025

**Type:** Google's own developer documentation

**Extracted URLs:**

https://developer.android.com/about/versions/14/behavior-changes-14
https://support.google.com/googleplay/android-developer/answer/13392821
https://source.android.com/docs/core/permissions/fsi-limits

**Description:** Android 14 introduced restrictions on full-screen display of incoming call notifications for third-party apps.

**Judicial Notice Basis:** Google's own developer documentation; independently verifiable.

### G-4 — Android 15: Boot-Time Foreground Service Restrictions (2024–2025) [JN]

**Source:** Android Developer Documentation

**Date:** 2024 (Android 15)

**Type:** Google's own developer documentation

**Extracted URLs:**

https://developer.android.com/about/versions/15/behavior-changes-15
https://developer.android.com/about/versions/15/changes/foreground-service-types

**Description:** Android 15 introduced a restriction prohibiting apps from launching phone-call-type foreground services after boot.

**Judicial Notice Basis:** Google's own developer documentation; independently verifiable.

### G-5 — Android 12/13: IMS Service Entitlement Formalization (2021–2022) [JN]

**Source:** Android Open Source Project (AOSP) and Android Developer Documentation

**Date:** 2021 (Android 12); 2022 (Android 13)

**Type:** Google's own open-source and developer documentation

**Extracted URLs:**

https://source.android.com/docs/core/connect/ims-service-entitlement
https://developer.android.com/reference/android/telephony/CarrierConfigManager

**Description:** Android 12 formalized and Android 13 expanded the integration of GSMA TS.43 service entitlement into the Android telephony stack, enabling automated provisioning of VoWiFi, VoLTE, and SMSoIP with carrier-controlled entitlement verification.

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**Judicial Notice Basis:** Google's own open-source and developer documentation; independently verifiable.

### G-6 — Pixel Call Assist Suite (2024–2026) [JN]

**Source:** Google Store and Support
**Date:** 2024–2026
**Type:** Google's own public documentation
**Extracted URLs:**

https://store.google.com/intl/en/ideas/articles/pixel-call-assist-phone-screen/
https://support.google.com/pixelphone/answer/9118387

**Description:** Google's Pixel phones feature a "Call Assist" suite of AI-driven telephony features — including Call Screen, Hold for Me, Direct My Call, Call Notes, and Wait Times — integrated with the preloaded Google Phone dialer app.
**Judicial Notice Basis:** Google's own public documentation; independently verifiable.

### G-7 — SMS and Call Log Permission Restrictions (July 2024) [JN]

**Source:** Google Play Developer Policy Center
**Date:** Effective July 17, 2024
**Type:** Google's own policy documentation
**Extracted URLs:**

https://support.google.com/googleplay/android-developer/answer/10208820
https://support.google.com/googleplay/android-developer/answer/14993590

**Description:** Google updated its Play Store policies to restrict which apps can access call logs and SMS data; only apps designated as the user's default handler for Phone, SMS, or Assistant may access such data.
**Judicial Notice Basis:** Google's own policy documentation; independently verifiable.

### G-8 — Android 13/14: eSIM Multiple Enabled Profiles (MEP) [JN]

**Source:** Android Open Source Project (AOSP)
**Date:** 2022 (Android 13); 2023 (Android 14)
**Type:** Google's own open-source documentation
**Extracted URLs:**

https://source.android.com/docs/core/connect/esim-mep
https://source.android.com/docs/core/connect/esim-overview

**Description:** Android 13 introduced and Android 14 enhanced support for Multiple Enabled Profiles (MEP) on eSIM hardware, requiring active carrier support and OEM collaboration for provisioning.
**Judicial Notice Basis:** Google's own open-source documentation; independently verifiable.

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**G-9 — Android 14: eSIM Transfer — Carrier-Integrated Profile Portability (2023) [JN]**

    **Source:** Android Open Source Project (AOSP)

    **Date:** 2023 (Android 14)

    **Type:** Google's own open-source documentation

    **Extracted URLs:**

        https://source.android.com/docs/core/connect/esim-transfer-carrier-integration

        https://source.android.com/docs/core/connect/esim-overview

**Description:** Android 14 introduced an eSIM Transfer feature requiring carrier integration for authentication, provisioning eligibility checks, and profile migration.

**Judicial Notice Basis:** Google's own open-source documentation; independently verifiable.

**G-10 — Android 16: JobScheduler Quota Tightening (2025) [JN]**

    **Source:** Android Developer Documentation

    **Date:** 2025 (Android 16)

    **Type:** Google's own developer documentation

    **Extracted URLs:**

        https://developer.android.com/about/versions/16/behavior-changes-all

        https://developer.android.com/about/versions/16/summary

**Description:** Android 16 tightened background execution quotas, further restricting background processing for non-system apps.

**Judicial Notice Basis:** Google's own developer documentation; independently verifiable.

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# APPENDIX H

## SAMSUNG ANDROID — PUBLIC RECORD MATERIALS

## IX. Purpose

Appendix H documents Samsung's Android platform telephony access controls, carrier integration practices, and recent feature additions relevant to architectural disparities between native carrier-integrated telephony and third-party VoIP applications on Samsung devices. All items are drawn from Samsung's own publicly available documentation, Knox resources, and press materials. Items dated after the filing of the First Amended Complaint (September 21, 2025) are included as evidence of a continuing pattern.

### H-1 — Galaxy AI Call Assist Suite (January 2024–February 2026) [JN]

**Source:** Samsung Support / samsung.com
**Date:** January 2024 through February 2026
**Type:** Samsung's own public documentation
**Extracted URLs:**

https://www.samsung.com/us/support/answer/ANS10000935/
https://www.samsung.com/us/support/answer/ANS10007435/
https://www.samsung.com/us/support/answer/ANS00092302/
https://www.samsung.com/us/support/answer/ANS10010345/
https://www.androidauthority.com/samsung-one-ui-8-5-direct-voicemail-3639084/

**Description:** Samsung's "Call Assist" suite includes Live Translate (January 2024), Text Call (One UI 6.1), Direct Voicemail (One UI 8.5, February 2026), and Call Screening (One UI 8.5). These features are integrated into the native Samsung Phone app and operate through the carrier-connected native dialer. On information and belief, a third-party VoIP app cannot access these features—they're available only to calls routed through the native carrier stack.
**Judicial Notice Basis:** Samsung's own public documentation; independently verifiable.

### H-2 — Auto Blocker Changed from Opt-In to Default-On (One UI 6.1.1, July 2024) [JN]

**Source:** Samsung Knox Documentation
**Date:** July 2024 (One UI 6.1.1)
**Type:** Samsung's own Knox documentation
**Extracted URL:** https://docs.samsungknox.com/admin/fundamentals/whitepaper/samsung-knox-mobile-security/system-security/samsung-auto-blocker/
**Description:** In One UI 6.1.1, Samsung changed its Auto Blocker feature from opt-in to enabled-by-default. Auto Blocker restricts application installation to the Google Play Store and Samsung Galaxy Store when enabled. Samsung made it harder for users to sideload apps—including third-party VoIP dialers that aren't distributed through the Play Store or Galaxy Store. Native carrier app ships pre-installed and faces no such barrier, while a competing VoIP app distributed outside those two stores is blocked by default. The user has to

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affirmatively disable a security feature to install it, which most won't do. Epic Games sued Samsung over this feature; Samsung settled in July 2025.

**Judicial Notice Basis:** Samsung's own Knox documentation; independently verifiable.

### H-3 — Samsung-GSMA Partnership — VoLTE Enabled by Default, User Toggle Removed (One UI 7, April–May 2025) [JN]

**Source:** GSMA Newsroom and Samsung Support

**Date:** April–May 2025 (One UI 7)

**Type:** GSMA press release and Samsung's own documentation

**Extracted URLs:**

https://www.gsma.com/newsroom/press-release/gsma-and-samsung-partner-to-enhance-voice-call-connectivity-through-4g-and-5g-networks/

https://www.samsung.com/us/support/answer/ANS10004612/

**Description:** Samsung and the GSMA announced a partnership to enable VoLTE by default on all Galaxy phones running Android 15 (One UI 7) or later, and Samsung removed the VoLTE toggle from user-visible settings. By enabling VoLTE by default and removing the user-facing toggle, Samsung and the GSMA ensured that all voice calls are routed through the carrier's IMS infrastructure with no user option to change it. The architecture is now hardwired to favor carrier-managed voice, and the user can't opt out at the device level.

**Judicial Notice Basis:** GSMA press release and Samsung's own documentation; independently verifiable.

### H-4 — Samsung IR.25 Binary — Carrier-Gated VoLTE Provisioning (October 2025) [JN]

**Source:** GSMA Blog

**Date:** October 2025

**Type:** GSMA published blog post

**Extracted URL:** https://www.gsma.com/solutions-and-impact/industry-services/blog/how-samsung-are-giving-volte-support-to-operators/

**Description:** A GSMA blog post describes Samsung introducing "IR.25 Binary" builds that apply carrier-specific IMS configuration settings from the GSMA Network Settings Exchange database. Samsung's IR.25 builds pull carrier-specific IMS configuration from the GSMA's Network Settings Exchange database and bake it into the device firmware. A third-party VoIP provider has no access to this database and no ability to have its configuration included in these builds. The disparity is architectural: carriers get firmware-level integration for their telephony settings, while non-carrier apps operate in userspace.

**Judicial Notice Basis:** Published industry organization blog; independently verifiable.

### H-5 — Knox Service Plugin — SIM/PLMN Lock Controls (March–April 2024) [JN]

**Source:** Samsung Knox Documentation

**Date:** March–April 2024

**Type:** Samsung's own Knox documentation

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**Extracted URL:** https://docs.samsungknox.com/admin/knox-platform-for-enterprise/knox-service-plugin/policies.html

**Description:** Samsung's Knox Service Plugin (KSP) provides granular SIM management policies including "SIM Lock Control with PLMN" which restricts telephony to an allowlist of authorized carrier codes. KSP policies are available to enterprise administrators and carrier partners. This is a policy tool available to carriers and enterprise administrators that can prevent a device from connecting to any network not on the approved list. A third-party VoIP provider cannot get itself added to a PLMN allowlist — it's not a carrier with a PLMN code. Carriers have a Samsung-provided tool to lock devices to their networks at the firmware level, while VoIP providers have no equivalent access.

**Judicial Notice Basis:** Samsung's own Knox documentation; independently verifiable.

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## X. PROCEDURAL NOTES

Judicial Notice (FRE 201): Under FRE 201(b), a court may judicially notice a fact that is "not subject to reasonable dispute" because it either: (1) is generally known within the trial court's territorial jurisdiction; or (2) can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. Judicial notice is sought as to the existence and content of these materials, not necessarily as to the truth of all assertions contained within them.

Internet Archive: Internet Archive (Wayback Machine) captures are independently verifiable by loading the archived URL. The Internet Archive is a 501(c)(3) non-profit digital library.

Federal Agency Records: All PTAB/USPTO records are public records of a federal agency accessible through PTAB's E2E database and USPTO Patent Center.

Proffered Items: Items marked [PROFFER] are internal business records that Plaintiff proffers as evidence of commercial activity and pre-litigation conduct. Introduction of these materials is subject to leave of Court and would be accompanied by a supporting declaration. These items are not submitted for the purpose of converting this motion into a motion for summary judgment.

Post-Filing Materials: Certain items in Appendices F, G, and H post-date the filing of the First Amended Complaint (September 21, 2025). These items are included to show a continuing pattern of the conduct described in the FAC.

[v.10]