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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

LYFT, INC.

Plaintiff,

v.

AGIS SOFTWARE DEVELOPMENT LLC,

Defendant.

Case No. 5:21-cv-04653-BLF (SVK)

**DECLARATION OF JEREMY J.
TAYLOR IN SUPPORT OF PLAINTIFF
LYFT, INC.’S RESPONSE TO
DEFENDANT AGIS SOFTWARE
DEVELOPMENT LLC’S MOTION FOR
LEAVE TO AMEND INFRINGEMENT
CONTENTIONS PURSUANT TO
PATENT LOCAL RULE 3-6**

Date: June 2, 2022
Time: 10:00 a.m.
Judge: Hon. Beth Labson Freeman
Trial Date: October 16, 2023
Courtroom: 3, Fifth Floor

1 I, Jeremy J. Taylor, declare as follows:

2 1. I am over the age of 21 and am fully competent to make this declaration. I have
3 personal knowledge of all facts recited herein and state that such facts are true and correct to my
4 knowledge or information and belief, and, if called upon to do so, I would testify competently about
5 them.

6 2. I am a partner at the law firm of Baker Botts L.L.P., 101 California St., Ste. 3600,
7 San Francisco, CA 94111, and I represent Lyft, Inc. (“Lyft”) in the above-captioned action. I submit
8 this declaration in support of Plaintiff’s Response to Defendant’s Motion for Leave to Amend
9 Infringement Contentions.

10 3. Attached hereto as **Exhibit A** is a document incorporating screenshots from true and
11 correct copies of AGIS Software’s Disclosure of Asserted Claims and Infringement Contentions,
12 served on Lyft in *AGIS Software Dev. LLC v. T-Mobile USA, Inc.*, Case No. 2:21-cv-72 (E.D. Tex.)
13 (“EDTX Action”) on May 19, 2021, and AGIS Software’s Disclosure of Asserted Claims and
14 Infringement Contentions, served on Lyft in this case on February 25, 2022.

15 4. Attached hereto as **Exhibit B** is a true and correct copy of an email from Jeremy
16 Taylor to AGIS’s counsel, sent on July 21, 2021.

17 5. Attached hereto as **Exhibit C** is a true and correct copy of correspondence from
18 Bethany Salpietra to Vincent Rubino, counsel for AGIS, sent on August 6, 2021.

19 6. Attached hereto as **Exhibit D** is a true and correct copy of AGIS Software’s First
20 Amended Disclosure of Asserted Claims and Infringement Contentions, served on Lyft in the EDTX
21 Action on September 27, 2021.

22 7. Attached hereto as **Exhibit E** is a true and correct copy of correspondence from
23 Bethany Salpietra to Vincent Rubino, counsel for AGIS, sent on October 5, 2021.

24 8. Attached hereto as **Exhibit F** is a true and correct copy of AGIS Software’s Second
25 Amended Disclosure of Asserted Claims and Infringement Contentions, served on Lyft in the EDTX
26 Action on November 3, 2021.

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1 9. Attached hereto as **Exhibit G** is a true and correct copy of Lyft’s Motion to Strike
2 AGIS’s First Amended Disclosure of Asserted Claims and Infringement Contentions in the EDTX
3 Action, filed on November 3, 2021.

4 10. Attached hereto as **Exhibit H** is a true and correct copy of Order by Judge Gilstrap
5 issued on January 19, 2022, in the EDTX Action.

6 11. Attached hereto as **Exhibit I** is a true and correct copy of Transcript of Case
7 Management Conference from January 27, 2022.

8 Executed on this 15 day of April, 2022, at San Francisco, California. I declare under penalty
9 of perjury under the laws of the United States of America that the foregoing is true and correct to
10 the best of my knowledge.

11 Dated: April 15, 2022

Respectfully submitted,

By: /s/ Jeremy J. Taylor

Jeremy J. Taylor

Attorneys for Plaintiff Lyft, Inc.

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