Exhibit G

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

AGIS SOFTWARE DEVELOPMENT LLC v. T-MOBILE USA, INC., and T-MOBILE US, INC.	§ § § § § § §	CASE NO. 2:21-cv-00072-JRG (Lead Case)
AGIS SOFTWARE DEVELOPMENT LLC v. LYFT, INC.	§ § § § § § §	CASE NO. 2:21-cv-00024-JRG (Member Case)
AGIS SOFTWARE DEVELOPMENT LLC v. UBER TECHNOLOGIES, INC., d/b/a UBER	§ § § § § § §	CASE NO. 2:21-cv-00026-JRG (Member Case)

DEFENDANT LYFT, INC.'S MOTION TO STRIKE PLAINTIFF'S FIRST AMENDED DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

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I.   Introduction

Plaintiff AGIS Software Development LLC's ("AGIS") infringement contentions are deficient and cannot stand for two primary reasons. First, AGIS's May 2021 Infringement Contentions include infringement allegations only for Lyft's iOS application, yet it attempts to improperly encapsulate other Lyft products, including applications for other operating systems, such as Android, through the use of boilerplate language. Lyft notified AGIS repeatedly over the course of several months that the boilerplate language was insufficient to provide proper notice of its infringement theories, against any Lyft product other than Lyft's iOS application, but AGIS did nothing in response.

Several months later, after reviewing Lyft's source code, AGIS provided source code contentions and for the very first time updated the infringement allegations to include Lyft's Android application. But source code contentions are meant to provide notice as to *how* the accused products meet the claim limitations; they are not a vehicle for adding new accused products to a case. If AGIS intended to accuse the Lyft Android app in this case, it should have provided the requisite notice months ago with its May contentions pursuant to Local Patent Rule 3-1 and consistent with its obligations. For this reason, AGIS's contentions should be limited to the Lyft iOS applications only.

Second, AGIS's contentions present conflicting theories that are facially untenable. Some of the asserted claims require network participants to store the cellular phone numbers or IP addresses of the other network participants. Other claims require anonymization: One network user does not have access to the telephone number and/or IP address of another network user. Despite the obvious conflict between these two sets of claims, AGIS asserts that the same accused Lyft products infringe both sets of claims. That cannot be. AGIS's contradictory allegations,

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