

Exhibit 8

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November 8, 2021

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VIA E-MAIL (VRUBINO@FABRICANTLLP.COM)

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Re: AGIS Software Development LLC v. T-Mobile USA, Inc., et al.
Case No. 2:21-cv-00072-JRG (E.D. Tex.) (Lead Case)
AGIS Software Development LLC v. Lyft, Inc.,
Case No. 2:21-cv-00024-JRG (E.D. Tex.) (Member Case)

Dear Vincent:

I write regarding Plaintiff AGIS Software Development LLC's ("AGIS" or "You") deficient document production, and specifically with respect to AGIS's production of minutes from board and shareholder meetings of Advanced Ground Information Systems, Inc. and AGIS Holdings, Inc.

Lyft informed AGIS on October 13, 2021—nearly a week before Lyft was to take the deposition of Ms. Margaret Beyer—that AGIS's document production failed to include any of the board meeting minutes that Ms. Beyer had previously testified about in both the Life360 case (Case No. 9:14-cv-80651) and the Huawei et al. case (2:17-cv-00513). *See* B. Salpietra 10/13/21 Email. Lyft requested, in this same email, that AGIS produce such materials. *Id.* AGIS did not respond to Lyft's initial correspondence regarding the unproduced board meeting minutes, and Lyft sent a follow-up email to AGIS regarding these and other missing materials on October 18, 2021. *See* B. Salpietra 10/18/21 Email. AGIS responded to Lyft's emails concerning the board meeting minutes *less than twelve hours before* Ms. Beyer's scheduled deposition, stating that the "meeting minutes were produced as AGISSOFTWARE_0643749." *See* A. Park 10/18/21 Email. Ms. Beyer confirmed, however, that the minutes AGIS identified in its 10/18/21 email were **not** the board meeting minutes that Ms. Beyer had referred to in her previous depositions. *See* ROUGH Depo. Tr. of Margaret Beyer at 79:14-18 ("Q: So [AGISSOFTWARE_0643749] is not a document that reflects minutes that you took in your role as secretary for one of the AGIS entities that we have discussed today? A: Positively not.").

Lyft continued to follow-up with AGIS regarding the missing meeting minutes numerous times following Ms. Beyer's deposition. *See* B. Salpietra 10/25/21 Email; B. Salpietra 11/1/21 Email. These emails were met with assurances from AGIS that such materials would be produced.

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See, e.g., E. Iturralde 11/2/21 Email (“Regarding the board meeting minutes that came up during Ms. Beyer’s deposition, we confirm that we will produce them before the close of fact discovery.”). Indeed, at the parties’ November 3, 2021 meet-and-confer to discuss discovery deficiencies, AGIS confirmed that its forthcoming document production would include the missing meeting minutes. In view of this representation, Lyft did **not** include this discovery dispute in its motion to compel that was filed later that evening. *See* Dkt. 199.

Although AGIS ultimately produced *some* meeting minutes on November 3, 2021, this production appears to be woefully incomplete. Rather than producing *all* minutes from the minute books of Advanced Ground Information Systems, Inc. and AGIS Holdings, Inc.—as Lyft understood AGIS to be doing—AGIS has made a selective production of the requested minutes, and has produced minutes for only *three* meetings. *See* AGISSOFTWARE_0660138 - AGISSOFTWARE_0660160; *see also* ROUGH Depo. Tr. of Margaret Beyer at 27:2-5. Lyft has indisputably been prejudiced by AGIS’s eleventh hour production of an incomplete set of meeting minutes (at least because Lyft has been unable to question any AGIS witnesses about the content of such minutes and due to Lyft’s reliance on AGIS’s assurances that such minutes would be produced) and demands that AGIS promptly produce any and all remaining minutes from the minute books for Advanced Ground Information Systems, Inc. and AGIS Holdings, Inc., as referenced by Ms. Beyer during her October 19, 2021 deposition.

Please let us know immediately whether AGIS will produce the remaining minutes on or before Thursday, November 11, 2021. Otherwise, please provide AGIS’s availability for a lead and local meet-and-confer on Friday, November 12, 2021.

Respectfully,



Bethany Salpietra

CC: All counsel of record