

EXHIBIT 11

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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 LYFT, INC.

14 Plaintiff,

15 v.

16 AGIS SOFTWARE DEVELOPMENT LLC,

17 Defendant.

Case No. 5:21-cv-04653-BLF

**PLAINTIFF LYFT, INC.'S FIRST SET OF
JURISDICTIONAL INTERROGATORIES
TO DEFENDANT AGIS SOFTWARE
DEVELOPMENT LLC, ADVANCED
GROUND INFORMATION SYSTEMS,
INC., AND AGIS HOLDINGS, INC.**

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1 **LYFT, INC.’S FIRST SET OF INTERROGATORIES**

2 Pursuant to Federal Rule of Civil Procedure 33, the Local Rules of this Court, and The
3 Court’s January 28, 2022 Order, Plaintiff Lyft, Inc. (“Lyft”) hereby submits this first set of
4 jurisdictional interrogatories to AGIS Software Development LLC (“AGIS Software”), Advanced
5 Ground Information Systems, Inc. (“AGIS, Inc.”), and AGIS Holdings, Inc. (“AGIS Holdings”).
6 Responses shall be provided to the office of Baker Botts L.L.P., 101 California Street, Suite 3600,
7 San Francisco, CA 94111, or at such other places as counsel may agree upon, within thirty (30) days
8 of service of these Interrogatories.

9 **DEFINITIONS**

10 The following definitions are set forth for the purposes of these interrogatories and should
11 be considered part of each interrogatory.

12 1. Preliminary Definitions: The present tense includes the past and future tenses. The
13 singular includes the plural, and the plural includes the singular. The terms “any” and “all” shall be
14 construed as “any and all.” “Including” means “including but not limited to.” Words in the
15 masculine, feminine, or neuter form shall include each of the other genders. The use of a verb in
16 any tense shall be construed as the use of the verb in all other tenses. The terms “and” and “or” are
17 terms of inclusion and not of exclusion and are to be construed either disjunctively or conjunctively
18 as necessary to make the request inclusive rather than exclusive. The use of the term “the” shall not
19 be construed as limiting the scope of any request.

20 2. “Lyft” and “Plaintiff” mean plaintiff Lyft, Inc. as well as any agents, affiliates, or
21 other persons acting on Lyft’s behalf.

22 3. “AGIS,” “Defendant,” “You,” or “Your” means defendant AGIS Software
23 Development LLC (“AGIS Software”) and includes, without limitation, (a) any of its divisions,
24 departments, or other organizational or operational units; (b) all of its predecessor or successor
25 companies, corporations, or other business entities, including its parents and affiliates (specifically
26 including Advanced Ground Information Systems, Inc. (“AGIS, Inc.”) and AGIS Holdings, Inc.
27 (“AGIS Holdings”)); (c) all present and former officers, directors, employees, consultants, agents,
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1 attorneys, affiliates, or others acting or purporting to act in whole or in part with any of the foregoing,
2 directly or indirectly.

3 4. "Third Party" or "Third Parties" means anyone other than Lyft or AGIS.

4 5. "Person" means any natural person, proprietorship, association, partnership, firm,
5 corporation, joint venture, government, or other legal entity, and shall include the owners, officers,
6 directors, agents, trustees, parents, subsidiaries, affiliates, assigns, predecessors, and successors of
7 such "Person."

8 6. "Document" shall have the broadest meaning permitted under the Federal Rules of
9 Civil Procedure and the Federal Rules of Evidence, and includes writings, recordings, photographs,
10 phonorecords, videos, drawings, charts, and other graphic matter that is or has been in AGIS's actual
11 or constructive possession or control. "Document" includes any tangible expression regardless of
12 the manner or medium in which the record is produced, reproduced, or stored, including without
13 limitation any written, printed, typed, recorded, photographed, photocopied, taped, graphic, or other
14 matter, in whatever form and whether in final or draft form. "Document" further includes
15 electronically stored information, including without limitation electronic mail, electronic
16 information stored on computer drives, diskettes, tapes, CDs, or other computer media, as well as
17 any other information stored magnetically, electronically, optically, or mechanically. A draft or
18 non-identical copy is a separate document within the meaning of this term. Any document bearing
19 marks, including, without limitation, initials, stamped indicia, comments, or notations not part of
20 the original document or photographic reproduction thereof, is a separate document.

21 7. "Communication" means, without limitation, any transmittal of information in the
22 form of facts, ideas, inquiries or otherwise, whether written, oral, or visual, and whether in person
23 or by telephone, letter, or any other medium and any attachments thereto. A document or thing
24 transferred, whether temporarily or permanently, from one person to another shall be deemed to be
25 a communication between such persons whether or not such document or thing was prepared or
26 created by the transferor or addressed to the transferee.

27 8. "Concerning," "concern(s)," "referring to," "relating to," "related to," "relate(s) to",
28 "pertaining to," or "pertain(s) to" shall mean identifying, referring to, concerning, evidencing,

1 demonstrating, summarizing, reflecting, constituting, containing, embodying, mentioning,
2 pertaining to, commenting on, connected with, discussing, describing, analyzing, showing,
3 comprising, illustrating, stating, dealing with, responding to, involving, recording, supporting,
4 negating, or relating to in any way relevant to a particular subject, in whole or in part, either directly
5 or indirectly.

6 9. As used herein, “identify” has the following meaning:

7 a) When used with respect to a Person, “identify” means to give, to the extent known,
8 the person’s full name, present or last known address, and when referring to a natural
9 person, additionally, the present or last known place of employment.

10 b) When used in relation to a Document, “identify” means to state: (i) the date the
11 Document was created; (ii) the author(s) of the Document; (iii) the recipient(s) of the
12 Document; (iv) any person or entity receiving a copy of the Document by “cc,”
13 “bcc,” or otherwise; (v) a basic description of the nature of the Document, including,
14 if applicable; (vi) the title of the Document; and (vii) whether the Document has been
15 or is being produced in this litigation, the Bates or identifier number affixed to the
16 Document. Documents to be “identified” include Documents in AGIS’s possession,
17 custody, or control, Documents known by AGIS to have existed but no longer exist,
18 and other Documents of which AGIS has knowledge or information.

19 c) As used with respect to an event, “identify” means to provide a description of the
20 event, the date of the event, the location of the event, and any participants in the
21 event.

22 INSTRUCTIONS

23 The following instructions apply to the interrogatories below and should be considered part
24 of each interrogatory.

25 1. These instructions and definitions should be construed to require answers based upon
26 the knowledge of, and information available to, the responding party as well as its agents,
27 representatives, and, unless privileged, attorneys. It is intended that the following discovery requests
28 will not solicit any material protected either by the attorney/client privilege or work product doctrine

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