

# Exhibit 3

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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,  
28

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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