

# Exhibit I

## Attachment B for US Patent No. 7,031,724 Against Lyft Accused Products

Based on information presently available,<sup>1</sup> Defendant AGIS Software Development LLC (“AGIS Software”) is the Plaintiff Lyft Technologies Inc. (“Lyft” or “Plaintiff”) infringes claims 9, 12-16 (the “Asserted Claims”) of U.S. Patent No. 7,031,724 (the “724 Patent”) through the Accused Products, Services which are manufactured, sold, offered for sale, and/or used.

The Accused Products comprise the Lyft and Lyft Driver applications, servers, and services manufactured by Lyft Technologies Inc. during and after 2016. AGIS Software reserves the right to seek leave of court to amend this list of Accused Products upon filing of an amended complaint or as discovery progresses.

Lyft directly infringes each of the Asserted Claims by making, using, importing, testing, distributing, selling, or offering for sale the Accused Products in violation of 35 U.S.C. § 271(a).

Lyft indirectly infringes the Asserted Claims in violation of 35 U.S.C. § 271(b) by inducing third parties, including third parties and/or customers, to directly infringe through their operation and use of the Accused Products. Lyft has knowingly induced this direct infringement by, *inter alia*, (i) selling, importing, or otherwise providing the Accused Products to third parties with the intent that the Accused Products will be operated and used in a manner that practices the Asserted Claims; (ii) advertising the Accused Products. Lyft’s marketing and promotional materials for the Accused Products are found on Lyft’s website, and in App stores of operating systems for which the Accused Products are made available. For example, Lyft offers customers instructions and/or manuals for the Accused Products that instruct customers to, among other things, use the services in the Accused Products. Lyft’s website also offers support to customers, including instruction to, among other things, use the Accused Products share location information with a group of users. Lyft knows, or should have known, that its actions will constitute infringement of the Asserted Claims, or subjectively believes that there is a high probability that its actions will constitute infringement of the Asserted Claims but has taken deliberate actions to avoid learning these facts.

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<sup>1</sup> These infringement contentions are provided on a provisional basis to comply with the deadline for P.L.R. 3-1. At this time, there is no operative complaint asserting non-infringement of any patent claim in this action, and these contentions are responsive to any claim or cause of action. AGIS Software reserves the right to update these contentions upon receipt of a responsive complaint. These March 18, 2022 amended contentions do not add or modify any theories of infringement and are for the purpose of making clear that AGIS Software does not allege infringement of any Lyft iOS-based applications. AGIS Software does not rely on any Apple products.

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Lyft also contributorily infringes each of the Asserted Claims in violation of 35 U.S.C. § 271(c) by selling for sale, and otherwise providing the Accused Products, which when used directly infringe the Asserted Claims. constitute a material part of the Asserted Claims.

The following chart identifies specifically where each limitation of each Asserted Claim is found within and in particular, the corresponding elements that meet the limitations in the Lyft and Lyft Driver applications, On information and belief, each charted version of the Lyft Rider and Driver Apps are representative of all ve Products, including all variants of the Accused Products made, sold, offered for sale, or used on any version of systems. On information and belief, Lyft also has applications through other distribution platforms.

AGIS Software does not concede that any claims of the '724 Patent that are not listed below are not infr Accused Products. Moreover, the citations to certain documents and other information below are intended to be no way foreclose AGIS from citing or relying on additional documents, information, source code, and/or testimon contentions are preliminary in nature and an analysis of Lyft's products, internal documentation, source code, relevant witnesses may more fully and accurately describe the infringing features of its accused products. Accor reserves the right to seek leave of court to supplement, correct, modify, and/or amend these contentions once such is made available to AGIS Software. Furthermore, AGIS Software reserves the right to seek leave of court to modify, and/or amend these contentions as discovery in this case progresses; in view of the Court's claim construct of any positions taken by Lyft, including but not limited to positions on claim construction, invalidity, and/or no connection with the preparation and exchange of expert reports.

The contents of each claim cell below on which another claim cell depends are expressly incorporated dependent cell, as if set forth in their entirety therein.

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<sup>2</sup> The construction of claim terms herein is consistent with the constructions in *AGIS Software Dev. LLC v. Huawei* No. 2:17-cv-00513-JRG, Dkt. 205 (E.D. Tex. Oct. 10, 2018); *AGIS Software Dev. LLC v. Google LLC*, No. 2:19-147 (E.D. Tex. Dec. 8, 2020); *AGIS Software Dev. LLC v. T-Mobile USA, Inc., et al.*, No. 2:21-cv-00072-JRG, D Nov. 10, 2021). AGIS Software reserves the right to update its constructions and contentions in view of this Court construction order.

**Attachment B for US Patent No. 7,630,724 Against Lyft Accused Products**

Claim – 7,630,724	Accused Products
<p>9[P]. A method for providing a cellular phone communication network for designated participating users, each user having a similarly equipped cellular phone that includes a CPU, GPS navigational system, an interact message transmitter and receiver and a touch screen display comprising:</p>	<p>The Lyft Accused Products perform a computer implemented method as set forth which infringes directly and/or indirectly by performing, inducing others to perform, and/or the performance of: a method for providing a cellular phone communication network for designated participating users, each user having a similarly equipped cellular phone that includes a CPU, GPS navigational system, an interact message transmitter and receiver and a touch screen display comprising:</p> <p>For example, Lyft provides Lyft app for passengers and Lyft Driver app for drivers. Lyft app for passengers and Lyft Driver app for drivers, in conjunction with Lyft’s servers and services, provide users with the ability to request, view, and track locations of passengers/riders using real-time maps and other data. Lyft server(s) and their services communicate with the Lyft apps for riders and drivers and their services host information related to and instructions for processing user accounts, location data, and map data. The claimed methods are distributed by Lyft. The claimed methods are used/tested by Lyft using the Lyft apps. The claimed methods are installed by Lyft’s customers (riders) and personnel (drivers, Lyft personnel) in the direction/encouragement of Lyft and used by Lyft’s customers and Lyft’s personnel. Each of the driver and the passenger’s mobile phones which are installed with the Lyft apps comprises a CPU, GPS, a navigational system symbol generator (Lyft App and Lyft Driver App) and a touch screen display. The Lyft and Lyft Driver application is supported by smartphones but not limited to smartphones and tablets, which have an antenna in them for both transmission and reception.</p> <h2>Lyft Driver app</h2> <p>We’ve separated the passenger and driver experiences into two separate mobile apps — one exclusively for passengers (named the Lyft app) and the other exclusively for drivers (named the Lyft Driver app).</p> <p>The Lyft Driver app will eventually be standard for all drivers and required for driving. At this time, we’ll keep using the Lyft app to give rides. Don’t worry! While we have some planned improvements to the Lyft Driver app, we’ve kept its features the same.</p>

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Claim – 7,630,724	Accused Products
	<p data-bbox="578 747 1471 781"><a href="https://help.lyft.com/hc/en-ca/articles/115013079208-Lyft-Driver-app">https://help.lyft.com/hc/en-ca/articles/115013079208-Lyft-Driver-app</a></p> <h2 data-bbox="586 831 883 884">What is Lyft?</h2> <p data-bbox="586 932 1624 1003">Lyft is a platform that connects drivers with individuals and organizations that need rides.</p> <p data-bbox="578 1031 1049 1064"><a href="https://www.lyft.com/drive-with-lyft">https://www.lyft.com/drive-with-lyft</a></p> <hr/> <p data-bbox="578 1136 703 1163"><b>Go online</b></p> <p data-bbox="578 1203 1624 1310">Open your Lyft Driver app and tap the steering wheel icon. Lyft will now find the closest to your location requesting a ride. Turn on some music and get comfortable: that first ride may come quickly or may take a while, depending on the number of current passengers.</p> <p data-bbox="578 1316 1232 1350"><a href="https://www.lyft.com/hub/posts/how-to-give-a-ride">https://www.lyft.com/hub/posts/how-to-give-a-ride</a></p>

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