

EXHIBIT F

Attachment E for US Patent No. 7,031,728 Against Lyft Accused Products

Based on information presently available,¹ Defendant AGIS Software Development LLC (“AGIS Software Development”) and Defendant Lyft Inc. (“Lyft” or “Plaintiff”) infringes claim 7 (the “Asserted Claim”) of U.S. Patent No. 7,031,728 through the Accused Products, Services which are manufactured, sold, offered for sale, and/or used by Lyft.

The Accused Products comprise the Lyft and Lyft Driver applications, servers, and services manufactured by Lyft 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 its employees 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.

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

¹ There is no operative complaint asserting non-infringement of any patent claim in this action at this time. AGIS Software Development reserves the right to update its contentions upon receipt of any future amended complaint.

Attachment E for US Patent No. 7,031,728 Against Lyft Accused Products

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 operating systems.

AGIS Software does not concede that any claims of the '728 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 testimony. 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. Accord 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 construction 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.

² 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's construction order.

Attachment E for US Patent No. 7,031,728 Against Lyft Accused Products

Claim – 7,031,728	Exemplary Supporting Evidence Regarding Accused Products
<p>7[P]. A method of establishing a cellular phone communication network for designated participants, each having a similarly equipped cellular phone that includes voice communication, free and operator selected text messages, photograph and video, a CPU, a GPS navigation system and a touch screen display comprising the steps of:</p>	<p>The Lyft Accused Products practice the method of establishing a cellular phone communication network for designated participants, each having a similarly equipped cellular phone that includes voice communication, free and operator selected text messages, photograph and video, a CPU, a GPS navigation system and a touch screen display.</p> <p>For example, Lyft provides Lyft app for passengers and Lyft Driver app for drivers. Lyft servers and services, 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 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 ride requests, 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 also used and installed by Lyft's customers (riders) and personnel (drivers, Lyft personnel) with the direction/encouragement of Lyft and used by Lyft's customers and Lyft's personnel.</p> <p>For example, when the passenger requests a ride from the Lyft app installed on the passenger's mobile device, the ride request message is broadcasted to the nearby drivers who are online on the Lyft app. The ride request message comprises the passenger's name and profile photo.</p> <p>For example, when the driver accepts the ride request of the passenger, the passenger receives the driver's information such as name, location, and driver's photo. After the driver match, both of them get the option to text each other.</p>

Attachment E for US Patent No. 7,031,728 Against Lyft Accused Products

Claim – 7,031,728	Exemplary Supporting Evidence Regarding Accused Products
	<h2 data-bbox="581 716 1073 793">Lyft Driver app</h2> <p data-bbox="581 835 1624 905">We've separated the passenger and driver experiences into two separate mobile apps — one for passengers (named the Lyft app) and the other exclusively for drivers (named the Lyft Driver app).</p> <p data-bbox="581 936 1624 1037">The Lyft Driver app will eventually be standard for all drivers and required for driving. At this time, we will continue to 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> <p data-bbox="581 1066 1471 1100">https://help.lyft.com/hc/en-ca/articles/115013079208-Lyft-Driver-app</p> <h2 data-bbox="581 1150 883 1199">What is Lyft?</h2> <p data-bbox="581 1251 1624 1320">Lyft is a platform that connects drivers with individuals and organizations that need rides.</p> <p data-bbox="581 1350 1049 1383">https://www.lyft.com/drive-with-lyft</p>

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.