

EXHIBIT B

Exhibit A for US Patent No. 8,213,970 Against ZTE Accused Products

In these Infringement Contentions, AGIS Software Development LLC (“AGIS”) contends that at least the following claims of U.S. Patent No. 8,213,970 (the “’970 Patent”) identified below are infringed by the Accused Products (e.g., phones and tablets) which are manufactured, sold, offered for sale, and/or used by Defendants ZTE (TX) Inc., ZTE (USA) Inc., and ZTE Corporation (collectively, “ZTE”).

The Accused Products comprise ZTE products running the Android mobile operating system and manufactured, used, or sold during and after 2011. For example, the Accused Products comprise the following Android-based phones and tablets: Adamant, Agent, Anthem 4G, Aspect, Avail / Merit, Avid 4, Avid 4G, Avid Plus, Avid Plus / Avid 828, Avid Trio / ZFive 2, Awe / Emblem, Axon, Axon 7 Max, Axon 7 mini, Axon Elite, Axon Lux, Axon M, Axon Max, Axon Mini, Axon Pro / Axon, Blade A1, Blade A2, Blade A2 Plus, Blade A2S, Blade A3, Blade A910, Blade C, Blade D Lux, Blade D2, Blade D6, Blade E, Blade Force, Blade G2, Blade L, Blade L3, Blade L5 Plus, Blade Max 3, Blade Max Blue, Blade Q, Blade Q Maxi, Blade Q Mini, Blade Qlux 4G, Blade S6, Blade S6 Lux, Blade S6 Plus, Blade S7, Blade Spark, Blade V580, Blade V6, Blade V7, Blade V7 Lite, Blade V7 Max, Blade V7 Plus, Blade V8, Blade V8 Lite, Blade V8 Mini, Blade V8 Pro, Blade Vantage, Blade Vec 3G, Blade Vec 4G, Blade X, Blade X Max, Blade X3, Blade X5, Blade X9, Blade Z Max, C78, C79, C88, CAPTR II / A210, Chorus, Citrine, Compel, Concord / Midnight, Concord II, CYMBAL LTE, Cymbal LTE (Verizon), Cymbal Z-320, Cymbal LTE, Cymbal-C LTE, Cymbal-G LTE, CYMBAL-T, Cymbal-T LTE, Engage, Engage LT / Engage MT, Engage C70, F160, Fanfare, Fanfare 2, Fanfare 3, Flash, Force, Fury / Director, Geek, Grand Memo II LTE, Grand S Flex, Grand S II, Grand S Pro, Grand S3, Grand X, Grand X 3, Grand X 4, Grand X 4, Grand X Max 2 / Imperial MAX, Grand X Max+, Grand X Quad Lite, Grand XMax, Groove, Hawkeye, Imperial, Imperial II, Jasper LTE, Kis 3 Max, Kis Flex, Majesty, Majesty Pro, Majesty Pro LTE, Majesty Pro Plus LTE, Maven 2, Maven 2 / Sonata 3, Maven 3 / Overture 3, Max, MAX Blue LTE, MAX XL, Max+, Memo, Midnight PRO LTE, MSGM8 II, N919D, Nubia M2, Nubia M2 Lite, Nubia M2 Play, Nubia My Prague, Nubia N1, Nubia N1 lite, Nubia N1, Nubia N2, Nubia Prague S, Nubia X6, Nubia Z11, Nubia Z11 Max, Nubia Z11 mini, Nubia Z11 mini S, Nubia Z17, Nubia Z17 Lite, Nubia Z17 mini, Nubia Z17 miniS, Nubia Z17S, Nubia Z7, Nubia Z7 Max, Nubia Z7 mini, Nubia Z9 Classic, Nubia Z9 Elite, Nubia Z9 Exclusive, Nubia Z9 Max, Nubia Z9 mini, Obsidian, Open, Open C, Open II, Overture, Overture 2 / Maven, Prelude / Avail 2, Prelude+, Prestige, Prestige 2, Q519T, Quartz, R225, Reef, Render, Salute, Savvy, Score M / Score, Small Fresh 4, Small Fresh 5, Solar, Sonata / Radiant, Sonata 2 / Paragon, Sonata 3, Source, Speed, Star 1, Star 2, Tempo, Tempo X, TXXM8 3G, V3 Energy Edition, V3 Extreme Edition, V3 Youth Edition, V5, V870, Valet, Vital / Supreme, Warp, Warp 4G, Warp 7, Warp Elite, Warp Sequent, Warp Sync, Whirl, Z221, Z222 / Z223, Z331, Z431 / Altair, Z432 / Altair 2, Z667 / Zinger / Prelude 2 / Flame / Whirl 2, Z998 / Unico LTE, ZFive 2 LTE, ZFive L LTE, Zinger, ZMax, Zmax 2, ZMAX 2 (Unlocked), ZMAX Champ LTE, ZMAX Grand / Champ / Avid 916, ZMAX GRAND LTE,

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ZMax Pro, and any variants thereof. AGIS reserves the right to amend this list of Accused Products as discovery progresses. For example, AGIS reviewed Android-based products from Android-based handset manufacturers, including three ZTE phones (serial numbers 329F75623FA5; 329F7562388B; and 329F75624913) which are available for inspection at ZTE's request. For example, the Accused Products comprise ZTE Accused Products, including but not limited to the phones and tablets as described herein, running the following versions (and all intervening updates and sub-versions) of the Android mobile operating system: Android 2.3, 4.0, 4.1, 4.2, 4.3, 4.4, 5.0, 5.1, 6.0, 7.0, 7.1, 8.0, and 8.1. For example, the Accused Products comprise ZTE products, including but not limited to the phones and tablets as described herein, running any versions of the following Android-based applications and/or software: Android Device Manager, Find My Phone, Find My Device, Google Latitude, Google Plus, Google Hangouts, Google Maps, Google Assistant, Google Search, Google Messages, Android Messenger, Google Allo, Google Duo, Gmail, and Google Chrome. For example, the Accused Products comprise ZTE products, including but not limited to the phones and tablets described herein, participating in any networks and/or services related to the execution and/or use of the Android mobile operating system versions and Android-based applications and/or software described herein.

AGIS does not concede that any claims of the '970 Patent that are not listed below are not infringed by the identified products. Moreover, the citations to certain documents and other information below are intended to be exemplary only and in no way foreclose AGIS from citing or relying on additional documents, information, source code, and/or testimony at a later time. These contentions are preliminary in nature, and an analysis of ZTE's products, internal documentation, source code, and/or testimony from relevant witnesses may more fully and accurately describe the infringing features of its accused products. Accordingly, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions once such additional information is made available to AGIS. Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as discovery in this case progresses; in view of the Court's claim construction order(s); in view of any positions taken by ZTE, including but not limited to positions on claim construction, invalidity, and/or non-infringement; and in connection with the preparation and exchange of expert reports.

Claim - 8,213,970	Accused Products
1[P]. A communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising: a	ZTE infringes either directly or indirectly, induces others to infringe, and/or contributes to the infringement of this system as set forth below. ZTE makes, uses, sells, and otherwise provides this system by making, using, selling, and importing Android devices, as well as by providing its servers for use with Android devices to enable features such as Find My Device in a

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<p>predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a CPU and a touch screen display a CPU and a memory;</p>	<p>communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising: a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a CPU and a touch screen display a CPU and memory.</p> <p>ZTE makes, uses, sells, and otherwise provides this communication system by making, using, selling, and importing Android OS devices such as Accused Products.</p> <p>The Accused Products meet the claim limitations by providing device-location tracking features such as those features described below. For example, the Accused Products meet the claim limitations because they are pre-installed with Android mobile operating systems containing code for providing device-location tracking features as provided in the claims limitations herein. For example, the Accused Products run applications and/or software that run within the Android mobile operating system and that use components of the Android mobile operating system to provide device-location tracking features. Upon information and belief, in addition to the components and features of the Android mobile operating system itself, the following applications and/or software run within the Android mobile operating system and use components of the Android mobile operating system to provide device-location tracking features: Android Device Manager, Find My Device.</p> <p>Android Device Manager is the predecessor to Find My Device and has been available as a standard, pre-installed feature since 2013 and downloadable as a software application. The current iteration, Find My Device, often called the “new and improved Android Device Manager” or “rebranded Android Device Manager” is now part of the standard Google Play Protect suite which is “built in and enabled on all devices,” i.e., the Accused Products running Android OS. AGIS sets forth the Find My Device feature of the Accused Products as representative of this method. AGIS reserves the right to supplement these contentions to the extent that ZTE requires additional information in accordance with P.R. 3-1 and for any other reason for which it may deem necessary.</p> <p>See, e.g., https://www.androidcentral.com/find-my-device; https://support.google.com/android/answer/6160491?hl=en;</p>

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Claim - 8,213,970

Accused Products

https://android.googleblog.com/2013/08/find-your-lost-phone-with-android.html;
 https://play.google.com/store/apps/details?id=com.google.android.apps.adm&hl=en;
 https://www.blog.google/products/android/google-play-protect/

Each “Google Account” is associated with a pre-determined number of devices, which include a CPU and a touchscreen, and which are registered when a customer acquires an Accused Product, such as a ZTE Android OS based device.



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