

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

AGIS SOFTWARE DEVELOPMENT LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 2:17-cv-513-JRG
	§	(Lead Case)
HUAWEI DEVICE USA INC., HUAWEI	§	
DEVICE CO., LTD. AND HUAWEI DEVICE	§	Civil Action No. 2:17-cv-514-JRG
(DONGGUAN) CO., LTD.,	§	Civil Action No. 2:17-cv-515-JRG
HTC COPORATION,	§	Civil Action No. 2:17-cv-516-JRG
LG ELECTRONICS, INC.,	§	Civil Action No. 2:17-cv-517-JRG
APPLE INC.	§	
ZTE CORPORATION, ZTE (USA), INC.	§	
AND ZTE (TX), INC.,	§	
	§	
Defendants.		

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO INCREASE PAGE LIMITS
FOR MARKMAN BRIEFING**

Defendants Huawei Device USA Inc., Huawei Device Co., Ltd, Huawei Device (Dongguan) Co., Ltd., HTC Corporation, LG Electronics, Inc., Apple Inc., ZTE (USA), Inc., and ZTE (TX), Inc. (collectively, “Defendants”) file this unopposed Motion for Leave to Increase Page Limit for Markman Briefing by 15 pages for each of Plaintiff AGIS Software Development LLC (“Plaintiff”) and Defendants file this unopposed Motion for Leave to Increase Page Limits for Markman Briefing by 15 pages for each of Plaintiff and Defendants.¹ Defendants seek to increase the page limit for their responsive Markman brief to 45 pages, from the 30 page default set forth in P.R. 4-5(e) and L.R. CV-7. Plaintiff does not oppose Defendants’ motion, as long as Plaintiff is granted a corresponding 15-page increase, to be distributed at Plaintiff’s choice

¹ ZTE Corporation remains a non-party until AGIS serves the Amended Complaint (Dkt. No. 32) on it in Civil Action No. 2:17-cv-517-JRG.

between its opening and reply briefs, from a total of 40 pages to a total of 55 pages.

This page limit increase is warranted in view of the number of claims and complexity of the legal issues involved in the parties' claim construction dispute. Plaintiff has asserted more than 92 claims against the consolidated defendants. The asserted claims derive from five patents directed to software applications that enable location tracking and communication among users. The asserted claims are lengthy and contain a large number of unique limitations, including many limitations written in means-plus-function form. Twenty of the parties' disputes center on indefiniteness, and twelve involve underlying disputes as to whether the term is properly construed under 35 U.S.C. § 112(6). A page limit increase is appropriate and necessary to allow the parties to meaningfully address these challenging legal issues for such a large number of claims.

For the reasons set forth above, Defendants respectfully request that the Court grant their unopposed motion to increase the page limit for each party's claim construction briefing to 45 pages.

Dated: July 18, 2018

Respectfully submitted:

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