

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

AGIS SOFTWARE DEVELOPMENT, LLC,	§	
	§	Case No. 2:17-cv-513-JRG
	§	(LEAD CASE)
Plaintiff,	§	
v.	§	
	§	JURY TRIAL DEMANDED
HUAWEI DEVICE USA INC., ET AL.,	§	
	§	
Defendants.	§	
	§	

**DECLARATION OF SHAHAR HAREL IN SUPPORT OF
PLAINTIFF AGIS SOFTWARE DEVELOPMENT, LLC'S
OPENING CLAIM CONSTRUCTION BRIEF**

Shahar Harel, hereby declares as follows:

1. I am an attorney at the law firm of Brown Rudnick LLP, counsel for Plaintiff AGIS Software Development, LLC ("Plaintiff"). I am admitted to practice before this Court. I submit this declaration in support of Plaintiff AGIS Software Development, LLC's Opening Claim Construction Brief. I am familiar with the facts set forth herein.
2. The exhibits attached to this declaration may contain annotations and/or excerpts of the originals.
3. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 8,213,970.
4. Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 9,408,055.
5. Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No. 9,445,251.

6. Attached hereto as Exhibit D is a true and correct copy of U.S. Patent No. 9,467,838.

7. Attached hereto as Exhibit E is a true and correct copy of US Patent No. 9,749,829.

8. Attached hereto as Exhibit F is a true and correct copy of annotated excerpts of Google LLC's Petition for *Inter Partes Review* of U.S. Patent 8,213,970, *Google LLC v. AGIS Software Development, LLC*, Case No. IPR2018-01079, Paper 2 (P.T.A.B., May 15, 2018).

9. Attached hereto as Exhibit G is a true and correct copy of annotated excerpts of Apple Inc.'s *Inter Partes Review* of U.S. Patent 8,213,970, *Apple Inc. v. AGIS Software Development, LLC*, Case No. IPR2018-000821, Paper 1 (P.T.A.B., March 22, 2018).

10. Attached hereto as Exhibit H is a true and correct copy of the Declaration Dr. Jaime G. Carbonell.

11. Attached hereto as Exhibit I is a true and correct copy of an annotated excerpts of *Apple Inc. v. AGIS Software Development, LLC*, Case No, IPR 2018-000821, Ex. 1002 (P.T.A.B., March 22, 2018).

12. Attached hereto as Exhibit J is a true and correct copy of an annotated excerpt of *Google LLC v. AGIS Software Development, LLC*, Case No, IPR 2018-01079, Ex. 1003 (P.T.A.B., May 15, 2018).

13. Attached hereto as Exhibit K is a true and correct copy of annotated excerpts from the file history of U.S. Patent No. 8,126,441 including a February 23, 2011 Amendment and Response to Office Action.

14. Attached hereto as Exhibit L is a true and correct copy of U.S. Patent No. 8,125,441.

15. Attached hereto as Exhibit M is a true and correct copy of annotated excerpts from the file history of U.S. Patent No. 9,445,251 including a November 13, 2015 Amendment and Response to Office Action.

16. Attached hereto as Exhibit N is a true and correct copy of annotated excerpts from the file history of U.S. Patent No. 9,445,251 including a December 10, 2015 Office Action.

17. Attached hereto as Exhibit O is a true and correct copy of annotated excerpts from the file history of U.S. Patent No. 9,445,251 including a January 26, 2016 Amendment and Response to Office Action.

18. Attached hereto as Exhibit P is a true and correct copy of *Apple Inc. v. AGIS Software Development, LLC*, Case No. IPR 2018-00818, Paper No. 1 (P.T.A.B., March 22, 2018).

19. Attached hereto as Exhibit Q is a true and correct copy of Appendix 1 to the Claim Construction brief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of July, 2018.

/s/ Shahar Harel
Shahar Harel