

EXHIBIT 7

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

AGIS SOFTWARE DEVELOPMENT, LLC,

Plaintiff,

v.

HUAWEI DEVICE USA INC., HUAWEI
DEVICE CO., LTD. AND HUAWEI
DEVICE (DONGGUAN) CO., LTD.

Defendants.

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Case No. 2:17-cv-513-JRG
(LEAD CASE)

JURY TRIAL DEMANDED

**PLAINTIFF’S PRELIMINARY CLAIM CONSTRUCTIONS AND PRELIMINARY
IDENTIFICATION OF EXTRINSIC EVIDENCE PURSUANT TO P.R. 4-2**

Pursuant to Patent Rule 4-2 and the Docket Control Order (Dkt. 115), Plaintiff, AGIS Software Development, LLC (“AGIS”) provides its preliminary proposed claim constructions and preliminary identification of extrinsic evidence, attached hereto as Appendix A, for U.S. Patent Nos. 8,213,970 (the “970 Patent”), 9,408,055 (the “055 Patent”), 9,445,251 (the “251 Patent”), 9,467,838 (the “838 Patent”), and 9,749, 829 (the “829 Patent”) (collectively, the “Patents-in-Suit”) to Defendants. Terms construed include those identified in each party’s P.R. 4-1 disclosures.

AGIS is producing and making available for inspection, pursuant to P.R. 4-2(b), copies of the preliminarily identified extrinsic evidence. *See* Exhibit 1. AGIS reserves the right to offer further extrinsic evidence to rebut preliminary claim constructions, testimony, or extrinsic evidence Defendants offer in support of their claim construction positions. In accordance with United States Court of Appeals for the Federal Circuit precedent, AGIS contends that the following information is part of the intrinsic record of the Asserted Patents, and therefore does

Proposed Terms	Claim(s)	AGIS's Preliminary Construction	Extrinsic Evidence
			AGIS may rely on papers and/or declarations filed in Inter Partes Review numbers IPR2018-00817, IPR2018-00818, IPR2018-00819, IPR2018-00821, IPR2018-01079, IPR2018-01080, IPR2018-01081, IPR2018-01082, IPR2018-01083, IPR2018-01084, IPR2018-01085, IPR2018-01086, IPR2018-01087, and IPR2018-01088.
“joining a communication network corresponding to a group, wherein joining the communication network comprises transmitting a message including an identifier corresponding to the group”	‘838 Claim 1	Plain Meaning	AGIS may rely on the expert testimony of Mr. Joseph McAlexander and/or Dr. Jaime G. Carbonell in connection with this claim term. AGIS may rely on papers and/or declarations filed in Inter Partes Review numbers IPR2018-00817, IPR2018-00818, IPR2018-00819, IPR2018-00821, IPR2018-

Proposed Terms	Claim(s)	AGIS's Preliminary Construction	Extrinsic Evidence
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<p>“identifying [second] user interaction with the interactive display selecting at least one of the [second set of] user-selectable symbols corresponding to at least one of the second devices and user interaction with the display specifying an action and, based thereon, initiating a phone call or phone conference with the at least one second device”</p> <p>“identifying user interaction with the interactive display selecting a particular user-selectable symbol corresponding to a particular second device and user interaction with the display specifying an action and, based thereon, initiating voice-over-IP (VOIP) communication with the particular second device”</p> <p>“identifying second user interaction with the interactive display selecting a particular user-selectable symbol corresponding to a particular second device and user interaction with the display specifying an action and, based thereon, initiating voice-over-IP (VOIP) communication with the</p>		Plain Meaning	<p>AGIS may rely on the expert testimony of Mr. Joseph McAlexander and/or Dr. Jaime G. Carbonell in connection with this claim term.</p> <p>AGIS may rely on papers and/or declarations filed in Inter Partes Review numbers IPR2018-00817, IPR2018-00818, IPR2018-00819, IPR2018-00821, IPR2018-01079, IPR2018-01080, IPR2018-01081, IPR2018-01082, IPR2018-01083, IPR2018-01084, IPR2018-01085, IPR2018-01086, IPR2018-01087, and</p>