

# EXHIBIT 15

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

**AGIS SOFTWARE DEVELOPMENT  
LLC,**

**Plaintiff,**

v.

**APPLE INC.,**

**Defendants.**

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**Civil Action No. 2:17-CV-516-JRG**

**JURY TRIAL DEMANDED**

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS  
AND AMENDED INFRINGEMENT CONTENTIONS**

Pursuant to P.R. 3-6(a)(1), Plaintiff AGIS Software Development LLC (“AGIS”) hereby makes the following amended<sup>1</sup> infringement disclosures under the Patent Local Rules with respect to United States Patent Nos. 9,467,838 (the “838 Patent”), 9,445,251 (the “251 Patent”), 9,408,055 (the “055 Patent”), 9,749, 829, (the “829 Patent”) and 8,213,970 (the “970 Patent”)

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<sup>1</sup> AGIS amends its infringement contentions in response to and as required by the Court’s claim construction order. AGIS submits these amended infringement contentions based on information available to AGIS at this time and makes no representations concerning the completeness, relevancy, and/or sufficiency of Apple’s source code productions to date. AGIS reserves the right to further amend these contentions based on additional discovery, including, but not limited to, additional source code productions, any outstanding and/or forthcoming discovery requests, and Apple’s ongoing duty to disclose all relevant information to this case.

(collectively, “patents-in-suit”). AGIS’s investigation is ongoing and discovery is ongoing.

Accordingly, these disclosures are based on information available to AGIS at this time. AGIS reserves the right to supplement this disclosure after further discovery from the Defendant and non-parties, particularly documents and other discovery regarding the Defendant’s accused products.

AGIS also reserves the right to assert additional claims of the patents-in-suit, accuse different products, or find alternative literal and/or equivalent infringing elements in the Defendant’s products.

inventions. AGIS reserves the right to amend this statement to identify covered products as discovery progresses.

Dated: November 12, 2018

Respectfully submitted,

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