

EXHIBIT 15

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No. 2:17-CV-0516-JRG
	§	
Plaintiff,	§	
	§	
v.	§	<u>JURY TRIAL DEMANDED</u>
	§	
APPLE, INC.,	§	
	§	
Defendant.	§	
	§	

**PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC’S SECOND SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO DEFENDANT APPLE INC.’S
THIRD SET OF INTERROGATORIES TO PLAINTIFF (NOS. 12-15)**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiff AGIS Software Development LLC (“AGIS” or “Plaintiff”) hereby responds to Defendant Apple Inc.’s (“Apple” or “Defendant”) Third Set of Interrogatories to Plaintiff (Nos. 12-15). These Interrogatories are continuing in nature and require supplementation in accordance with the Federal Rules of Civil Procedure as follows:

These responses are made solely for the purposes of this action, and are made without waiving, or intending to waive, the right at any time to revise, correct, modify, supplement or clarify any response provided herein or the right to object on any proper grounds to the use of these responses, for any purpose in whole or in part, in any subsequent proceedings or any other action. The right to raise any applicable objections at any time is expressly reserved. A response to any interrogatory herein should not be taken as an admission or acceptance of the existence of any facts set forth or assumed by such interrogatory, or that such response constitutes admissible

evidence. The responses herein reflect only the present state of AGIS's investigation and the present state of discovery. Except as otherwise indicated, an objection and/or response to a specific interrogatory does not imply that facts responsive to the interrogatory exist.

GENERAL OBJECTIONS

AGIS incorporates by reference the general and specific objections in AGIS's *Objections and Responses to Apple's First Set of Interrogatories to Plaintiff (Nos. 1-10)*, dated December 4, 2017, AGIS's *Supplemental Objections and Responses to Apple's First Set of Interrogatories to Plaintiff (Nos. 1-10)*, dated February 15, 2018, AGIS's *Second Supplemental Objections and Responses to Apple's First Set of Interrogatories to Plaintiff (Nos. 1-10)*, dated March 16, 2018, and AGIS's *Objections and Responses to Defendant Apple Inc.'s Second Set of Interrogatories to Plaintiff (No. 11)* served March 30, 2018, AGIS's *Objections and Responses to Defendant Apple Inc.'s Third Set of Interrogatories to Plaintiff (Nos. 12-15)* served June 1, 2018, AGIS's *Objections and Responses to Defendant Apple Inc.'s Fourth Set of Interrogatories to Plaintiff (No. 16)* served May 18, 2018; AGIS's *Third Supplemental Objections and Responses to Apple's First Set of Interrogatories to Plaintiff (Nos. 1-10)* served August 18, 2018; AGIS's *Objections and Responses to Apple's Fifth Set of Interrogatories to Plaintiff (Nos. 17-22)* served August 20, 2018; AGIS's *Supplemental Objections and Responses to Apple's Fifth Set of Interrogatories to Plaintiff (Nos. 17-22)* served September 12, 2018; AGIS's *Fourth Supplemental Objections and Responses to Apple's First Set of Interrogatories to Plaintiff (Nos. 1-10)* served September 17, 2018; AGIS's *Supplemental Objections and Responses to Apple's Third Set of Interrogatories to Plaintiff (Nos. 12-15)* served September 21, 2018; AGIS's *Objections and Responses to Apple's Sixth Set of Interrogatories to Plaintiff (Nos. 23-24)* served September 24, 2018; AGIS's *Second Supplemental Objections and Responses to Apple's Fifth Set of Interrogatories to Plaintiff (Nos.*

17-22) served September 27, 2018; *AGIS's Third Supplemental Objections and Responses to Apple's Fifth Set of Interrogatories to Plaintiff (Nos. 17-22)* served October 15, 2018; *AGIS's Fifth Supplemental Objections and Responses to Apple's First Set of Interrogatories to Plaintiff (Nos. 1-10)* served October 22, 2018, *AGIS's Fourth Supplemental Objections and Responses to Apple's Fifth Set of Interrogatories to Plaintiff (Nos. 17-22)* served October 24, 2018; and *AGIS's Objections and Responses to Apple's Seventh Set of Interrogatories to Plaintiff (No. 25)* served October 24, 2018, and further objects as follows:

**SPECIFIC OBJECTIONS AND RESPONSES TO DEFENDANT'S
THIRD SET OF INTERROGATORIES TO PLAINTIFF (NOS. 12-15)**

INTERROGATORY NO. 12

Identify each person and entity over whose documents and materials AGIS Software Development LLC has control.

RESPONSE TO INTERROGATORY NO. 12:

AGIS hereby incorporates the General Objections as if fully set forth herein. AGIS further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, attorney work product doctrine, and/or any other applicable privilege. AGIS further objects to this Topic on the ground it seeks information publicly available. AGIS objects to this topic as vague, ambiguous and confusing. AGIS objects to the definition of "control" as vague, ambiguous, overbroad, and uncertain. AGIS objects to the term "entity" as vague, ambiguous, and uncertain.

Notwithstanding its general and specific objections, AGIS answers as follows:

Discovery in this case is still ongoing and AGIS continues to investigate this matter.

AGIS Software Development LLC maintains documents and materials of AGIS Software Development LLC.

INTERROGATORY NO. 13

Separately, for each of U.S. Patent Nos. 9,408,055, 9,445,251, 9,467,838, and 9,749,829, state whether or not AGIS contends that the asserted claims are governed by pre-America Invents Act 35 U.S.C. §§ 102 and 103 (that is, the versions of 35 U.S.C. §§ 102 and 103 that were in effect prior to March 16, 2013). If AGIS contends that any of U.S. Patent Nos. 9,408,055, 9,445,251, 9,467,838, and 9,749,829 is governed by pre-America Invents Act 35 U.S.C. §§ 102 or 103, state the complete factual and legal bases for such contention.

RESPONSE TO INTERROGATORY NO. 13:

AGIS hereby incorporates the General Objections as if fully set forth herein. AGIS further objects to this interrogatory as containing multiple distinct subparts, each of which count

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