EXHIBIT 6

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

AGIS SOFTWARE DEVELOPMNT LLC,	
Plaintiff,	Civil Action No. 2:17-cv-00516-JRG
v.	
APPLE INC.,	
Defendant.	

DEFENDANT APPLE'S PATENT RULE 3-3 INVALIDITY CONTENTIONS

been motivated to combine the teachings of those and similar references that deal with improving systems and methods for the transmission of messages among devices located in different places.

The claim charts attached hereto provide additional detail and explanation concerning the motivation to combine the teachings of certain references and/or modify the disclosures of the prior art references.

As demonstrated in the claim charts attached as Exhibits A-1 to A-5, B-1 to B-14, C-1 to C-14, D-1 to D-14, and E-1 to E-14, each of the asserted claims of the '970, '055, '251, '838, and '829 patents is invalid: (a) under 35 U.S.C. § 102 as anticipated by one or more of the following references, and/or (b) under 35 U.S.C. § 103 as obvious in light of one or more of the following references either individually or in combination. These references are prior art under at least pre-AIA 35 U.S.C. §§ 102(a), (b), (e), (g), AIA 35 U.S.C. § 102(a)(1) and/or (a)(2), and/or (pre-AIA and AIA) 35 U.S.C. § 103(a).

- United States Patent Publication No. 2003/0217109, entitled "Method and Apparatus for Automatic Notification and Response" to Ordille, published Sept. 11, 2008 (APL-AGIS_00012105 - APL-AGIS_00012144).

- United States Patent Application No. 08/0219416, entitled "Method and System for Obtaining Feedback from At Least One Recipient Via a Telecommunication Network" to Roujinsky, published Sept. 11, 2008 (APL-AGIS_00012145 - APL-AGIS_00012161).

- United States Patent No. 7,609,669, entitled "Voice Directed System and Method Configured for Assured Messaging to Multiple Recipients" to Sweeney, issued October 27, 2009 (APL-AGIS_00012170 - APL-AGIS_00012180).

- United States Patent No. 7,386,589, entitled "Managed Messaging Platform with Message Response Aggregation" to Tanumihardja, issued June 10, 2008 (APL-AGIS_00012181 - APL-AGIS_00012235).

- United States Patent No. 6,816,878, entitled "Alert Notification System" to Zimmers, issued on November 9, 2004 (APL-AGIS_00012236 - APL-AGIS_00012283).

- United States Patent No. 5,692,032, entitled "Mobile Terminal Having One Key User Message Acknowledgment Function" to Seppanen, issued November 11, 1995 (APL-AGIS_00012162 - APL-AGIS_00012169).

- United States Patent Publication No. 2006/0178128, entitled "Method of operating a mobile communication device and mobile communication system during an emergency situation" to Eaton, published August 10, 2006 (APL-AGIS_00012094 - APL-AGIS_00012104).

- United States Patent Application No. 2007/0281690, entitled "Displaying and Tagging Places of Interest on Location-Aware Mobile Communication Devices in a Local Area Network" to Altman, published December 6, 2007 (APL-AGIS_00011797 - APL-AGIS_00011823).

- United States Patent No. 7,353,034, entitled "Location Sharing and Tracking using Mobile Phones or other Wireless Devices" to Haney, issued Apr. 1, 2008 (APL-AGIS_00011875 - APL-AGIS_00011939).

- United States Patent No. 7,917,866, entitled "Method, System, and Graphical User Interface for Meeting-Spot-Related Online Communications" to Karam, issued March 29, 2011 (APL-AGIS_00011940 - APL-AGIS_00011962).

- United States Patent Application No. 2002/0115453, entitled "Method and System for Location Based Wireless Communication Services" to Poulin, published August 22, 2002 (APL-AGIS_00011986 - APL-AGIS_00012004).

- United States Patent No. 7,450,003, entitled "User-Defined Private Maps" to Weber, issued November 11, 2008 (APL-AGIS_00012073 - APL-AGIS_00012093).

- United States Patent No. 7,330,112, entitled "Location-Aware Services" to Emigh issued Feb. 12, 2008 (APL-AGIS_00011851 - APL-AGIS_00011874).

- United States Patent No. 6,867,733, entitled "Method and System for a Plurality of Mobile Units to Locate One Another" to Sandhu, issued March 15, 2005 (APL-AGIS_00012005 - APL-AGIS_00012017).

- United States Patent No. 7,271,742, entitled "Method And Apparatus For Sending, Retrieving And Planning Location Relevant Information" to Sheha, issued Sept. 18, 2007 (.APL-AGIS_00012018 - APL-AGIS_00012072).

- United States Patent No. 6,148,332, entitled "Mandatory Message Display And Reporting System" to Brewer, issued Nov. 14, 2000 (APL-AGIS_00012914 - APL-AGIS_00012922).

- United States Patent No. 6,108,704, entitled "Point-to-Point Internet Protocol" to Hutton, issued Aug. 22, 2000 (APL-AGIS_00012923 - APL-AGIS_00012954).

- APRS Protocol Reference 1.0 ("APRS 1.0"), published on or before August 29, 2000.

28

- The ActiveCampus system, which on information and belief was made available to the public no later than April 2003 by the University of California San Diego, and as described in at least the materials identified in Exhibits B-1, C-1, D-1, and E-1 hereto.

- At least under Plaintiff's infringement theories and apparent interpretation of the claims, the AGIS's LifeRing Product and its prototypes (the "AGIS system"), which on information and belief was made available to the public by October 30, 2005 by AGIS, and as described in at least the materials identified in Exhibits B-2, C-2, D-2, and E-2 hereto.

- The AT&T Find Friends system, which on information and belief was made available to the public no later than June 24, 2002 by AT&T, and as described in at least the materials identified in Exhibits B-5, C-5, D-5, and E-5 hereto.

- The BuddySpace system, which on information and belief was made available to the public at least by June 2002, and no later than September 21, 2004, by the Open University, and as described in at least the materials identified in Exhibits B-6, C-6, D-6, and E-6 hereto.

- The Navizon system, made available to the public at least by October 30, 2005, and no later than February 20, 2006, by Navizon Inc., and as described in at least the materials identified in Exhibits B-9, C-9, D-9, and E-9 hereto.

- The Automatic Packet/Position Reporting System ("APRS System"), which on information and belief was made available to the public no later than September 21, 2004 by Bob Bruninga, and as described in at least the materials identified in Exhibits B-4, C-4, D-4, and E-4 hereto.

- Force XXI Battle Command, Brigade And Below ("FBCB2"), which on information and belief was made available to the public no later than March 21, 2003 by the U.S. Army, and as described in at least the materials identified in B-14, C-14, D-14, and E-14 hereto.

Apple reserves the right to modify or supplement these charts, including to add new prior art references, as discovery proceeds, consistent with P.R. 3-6. As one example, on information and belief, AGIS's own prior disclosure, use, sale, and/or offer for sale of certain products (or prototypes of products), including certain materials AGIS produced pursuant to P.R. 3-2(b). *See* Exs. B-2, C-2, D-2, and E-2.   In its infringement contentions, AGIS represented that it would make source code and other software concerning such products available for inspection (*see* AGIS Oct. 6, 2017 Infringement Contentions at footnote 2). Apple has requested the immediate

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