

# EXHIBIT 6

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	
	§	
Plaintiff,	§	
v.	§	<b>Civil Action No. 2:17-CV-513-JRG</b>
	§	<b>(Lead Case)</b>
HUAWEI DEVICE USA INC., HUAWEI	§	
DEVICE CO., LTD. AND HUAWEI	§	Civil Action No. 2:17-CV-514-JRG
DEVICE (DONGGUAN) CO., LTD.,	§	Civil Action No. 2:17-CV-515-JRG
HTC CORPORATION,	§	Civil Action No. 2:17-CV-516-JRG
LG ELECTRONICS INC.,	§	Civil Action No. 2:17-CV-517-JRG
APPLE INC.,	§	
ZTE CORPORATION, ZTE (USA), INC.,	§	
AND ZTE (TX), INC.,	§	
	§	
Defendants.	§	
	§	

**DEFENDANTS' NOTICE OF DEPOSITION OF  
AGIS SOFTWARE DEVELOPMENT LLC PURSUANT TO RULE 30(B)(6)**

**TO PLAINTIFF AND ITS COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Huawei Device USA Inc.; Huawei Device Co., Ltd.; Huawei Device (Dongguan) Co., Ltd.; LG Electronics, Inc.; HTC Corporation; Apple Inc.; ZTE (TX) Inc.; and ZTE (USA) Inc. (collectively, "Defendants"), by and through undersigned counsel, will take the deposition upon oral examination of Plaintiff AGIS Software Development LLC ("AGIS") on the topics listed below.

The deposition will begin at 9:00 a.m. on September 10, 2018 at Phillips Point, East Tower, 777 S. Flagler Drive, Suite 1000, West Palm Beach, Florida 33401 or at a mutually-agreed time and place and will continue from day to day until completed or at such other date and time that are mutually agreeable to the parties. The deposition will take place before an officer duly authorized

by law to take depositions. The deposition will be recorded by stenographic and videographic means for discovery purposes and use at trial.

By September 3, 2018, AGIS shall provide a written designation of the name(s) and position(s) of the one or more officers, directors, managing agents, or other persons who will be produced to testify on AGIS's behalf concerning the matters set forth in the following topics. Pursuant to Federal Rule of Civil Procedure 30(b)(6), the person(s) designated by AGIS should be prepared to testify as to such matters known or reasonably available to AGIS.

### **DEFINITIONS**

The following definitions are applicable herein, regardless of whether upper or lower case letters are used:

1. "Defendants" shall mean Defendants Huawei Device USA Inc.; Huawei Device Co., Ltd.; Huawei Device (Dongguan) Co., Ltd.; LG Electronics, Inc.; HTC Corporation; Apple Inc.; ZTE (TX) Inc.; and ZTE (USA) Inc.

2. "Plaintiff," "AGIS," "You," and "Your" shall mean AGIS Software Development LLC and its predecessor or successor entities, and any of its subsidiaries, divisions, affiliates, and any present and former agents, employees, partners, attorneys, representatives, and any other person or entity acting in concert with AGIS Software Development LLC, on behalf of AGIS Software Development LLC, or within the control of AGIS Software Development LLC, including any person or entity from whom AGIS Software Development LLC has the legal right to obtain documents or information on demand.

3. "AGIS Related Entities" means AGIS, Inc. and AGIS Holdings, Inc., and their predecessor or successor entities, and any of its subsidiaries, divisions, affiliates, and any present and former agents, employees, partners, attorneys, representatives, and any other person or entity

acting in concert with AGIS, Inc. and/or AGIS Holdings, Inc., on behalf of AGIS, Inc. and/or AGIS Holdings, Inc., or within the control of AGIS, Inc. and/or AGIS Holdings, Inc., including any person or entity from whom AGIS, Inc. and/or AGIS Holdings, Inc. has the legal right to obtain documents or information on demand.

4. “Action” means *AGIS Software Development LLC v. Huawei Device USA Inc., et al.*, 2:17-cv-00513-JRG (E.D. Tex.) (Lead Case), which also includes the consolidate member cases: 17-cv-514-JRG (E.D. Tex.), 17-cv-515-JRG (E.D. Tex.), 17-cv-516-JRG (E.D. Tex.), 17-cv-517-JRG (E.D. Tex.).

5. “’970 Patent” means U.S. Patent No. 8,213,970, entitled “Method of Utilizing Forced Alerts for Interactive Remote Communications.”

6. “’055 Patent” means U.S. Patent No. 9,408,055, entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.”

7. “’251 Patent” means U.S. Patent No. 9,445,251, entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.”

8. “’838 Patent” means U.S. Patent No. 9,467,838, entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.”

9. “Patents-in-Suit” means the ’970 Patent, the ’055 Patent, the ’251 Patent, and the ’838 Patent.

10. “’410 Application” means U.S. Patent Application No. 14/027,410, entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.”

11. “Related Patents and Patent Applications” means any issued patent or patent application having a relation by continuation application, continuation-in-part application, and/or divisional application, as defined by the Manual of Patent Examining Procedure (Ninth Edition,

Revision 07.2015) §§ 201.06–08, with respect to the Patents-in-Suit. “Related Patent Application” includes any international application and/or foreign counterpart of the Patents-in-Suit. “Related Patent Application” also includes any patent application or issued patent within a chain of copendency with respect to any of the Patents-in-Suit.

12. “Named Inventor” means the named inventor(s) of the Patents-In-Suit, Malcolm K. Beyer, Jr. and/or Christopher R. Rice.

13. “AGIS Practicing Product” means each apparatus, product, device, process, method, or act made, used, sold, offered for sale, and/or imported by AGIS and/or AGIS Related Entities that AGIS contends falls within the scope of any claim of the Patents-in-Suit, including, but not limited to, anything branded as LifeRing, ASSIST, or HoundDog.

14. “Accused Product(s)” means each and every activity, product, process, method, system, device, apparatus, network, software, and other thing that AGIS accuses of infringing any of the Patents-in-Suit in AGIS’s Infringement Contentions against any Defendant.

15. “Asserted Claims” means the claims of the Patents-in-Suit asserted against any of the Defendants as specified in AGIS’s Infringement Contentions against any Defendant, and as also refined by AGIS’s election of asserted claims against any Defendant, pursuant to the operative Docket Control Order entered in this case.

16. “Google Applications” means each and every activity, product, process, method, system, device, apparatus, network, software, and other things related to Google Latitude, Android Device Manager, Find My Device, Google Maps, Messenger, Android Messages, Google Hangouts, Google Plus, or Dodgeball.

17. “Complaint” or “Complaints” means the currently operative complaint(s) in this Action.

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