

EXHIBIT 18

From: [Ameet Modi](#)
To: [Rubino, Vincent J.](#)
Cc: [Dangelmajer, Susan E.](#); [Melissa Smith](#); [Michael Stadnick](#); [Jeffrey Seddon](#); [Franco Silletta](#); [John Desmarais](#); [Brian Matty](#); [Wesley White](#); [Apple AGIS Service](#); [AGIS-Lit](#)
Subject: RE: AGIS Software Development LLC v. Huawei Device USA Inc., et al. Case No. 2:17-cv-0513-JRG (Lead Case)
Date: Wednesday, October 3, 2018 4:03:01 PM

Vincent,

Thanks for your confirmation. We will be serving objections to AGIS's subpoena topics in due course, and Mr. Siegel will be made available to testify in response to the subpoena topics (subject to those objections), his personal knowledge, and concerning his expert report(s) during the expert discovery period.

Thanks,
Ameet

From: Rubino, Vincent J. <VRubino@brownrudnick.com>
Sent: Wednesday, October 3, 2018 10:06 AM
To: Ameet Modi <AModi@desmaraisllp.com>
Cc: Dangelmajer, Susan E. <SDangelmajer@brownrudnick.com>; Melissa Smith <melissa@gillamsmithlaw.com>; Michael Stadnick <MStadnick@desmaraisllp.com>; Jeffrey Seddon <JSeddon@desmaraisllp.com>; Franco Silletta <FSilletta@desmaraisllp.com>; John Desmarais <JDesmarais@desmaraisllp.com>; Brian Matty <BMatty@desmaraisllp.com>; Wesley White <WWhite@desmaraisllp.com>; Apple AGIS Service <AppleAGISService@desmaraisllp.com>; AGIS-Lit <agislit@brownrudnick.com>
Subject: [Ext] Re: AGIS Software Development LLC v. Huawei Device USA Inc., et al. Case No. 2:17-cv-0513-JRG (Lead Case)

Ameet,

As long as AGIS is able to question Mr. Siegel regarding the scope of his subpoena and his personal knowledge as if the deposition were conducted during the fact discovery period, the timing of the deposition is agreeable. However, depending on the content of any report submitted by Mr. Siegel, AGIS may request additional time to cover the subpoena topics. With this understanding, AGIS agrees to postpone the deposition until after expert reports.

Regards,
Vincent

On Oct 3, 2018, at 9:59 AM, Ameet Modi <AModi@desmaraisllp.com<<mailto:AModi@desmaraisllp.com>>> wrote:

Counsel,

I write regarding the September 27, 2018 notice of subpoena to non-party Neil Siegel. Mr. Siegel is not available for deposition on the noticed date (October 9, 2018). As I have explained in earlier correspondence, Mr. Siegel has been retained as an expert consultant in this matter. It seems more efficient to conduct his deposition once during the expert discovery period, after service of his expert

report(s). See, e.g., Raytheon Co. v. Indigo Systems Co., No. 4:07-cv-109, 2008 WL 4411569 (E.D. Tex. Sep. 23, 2008). Please let us know whether AGIS will agree to conduct any deposition of Mr. Siegel during expert discovery, rather than during fact discovery.

Regards,
Ameet

From: Dangelmajer, Susan E.

<SDangelmajer@brownrudnick.com<<mailto:SDangelmajer@brownrudnick.com>>>

Sent: Thursday, September 27, 2018 5:34 PM

To: Ameet Modi <AModi@desmaraisllp.com<<mailto:AModi@desmaraisllp.com>>>; Melissa Smith <melissa@gillamsmithlaw.com<<mailto:melissa@gillamsmithlaw.com>>>; Michael Stadnick <MStadnick@desmaraisllp.com<<mailto:MStadnick@desmaraisllp.com>>>; Jeffrey Seddon <JSeddon@desmaraisllp.com<<mailto:JSeddon@desmaraisllp.com>>>; Franco Silletta <FSilletta@desmaraisllp.com<<mailto:FSilletta@desmaraisllp.com>>>; John Desmarais <JDesmarais@desmaraisllp.com<<mailto:JDesmarais@desmaraisllp.com>>>; Brian Matty <BMatty@desmaraisllp.com<<mailto:BMatty@desmaraisllp.com>>>; Wesley White <WWhite@desmaraisllp.com<<mailto:WWhite@desmaraisllp.com>>>; Apple AGIS Service <AppleAGISService@desmaraisllp.com<<mailto:AppleAGISService@desmaraisllp.com>>>

Cc: AGIS-Lit <agislit@brownrudnick.com<<mailto:agislit@brownrudnick.com>>>

Subject: [Ext] AGIS Software Development LLC v. Huawei Device USA Inc., et al. Case No. 2:17-cv-0513-JRG (Lead Case)

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Counsel,

Attached please find revised Notices of Subpoena to William G. Griswold and Neal Gilbert Siegel. I apologize for the inconvenience.

Regards,

From: Ameet Modi [<mailto:AModi@desmaraisllp.com>]

Sent: Thursday, September 27, 2018 3:45 PM

To: Dangelmajer, Susan E.; Melissa Smith; Michael Stadnick; Jeffrey Seddon; Franco Silletta; John Desmarais; Brian Matty; Wesley White; Apple AGIS Service

Cc: AGIS-Lit

Subject: RE: AGIS Software Development LLC v. Huawei Device USA Inc., et al. Case No. 2:17-cv-0513-JRG (Lead Case)

Counsel,

We are in receipt of the September 21, 2018 notices of deposition subpoenas to Mr. Siegel and Mr. Griswold. The subpoenas attached thereto are not signed, nor do the notices or subpoenas indicate any noticed deposition dates.

With respect to Mr. Siegel, please direct any communications concerning any subpoena for deposition to my firm. With respect to Mr. Griswold, we ask that you please keep us informed of any communications with Mr. Griswold regarding deposition scheduling, so that we can coordinate a mutually convenient date for all parties.

Regards,
Ameet

From: Dangelmajer, Susan E.
<SDangelmajer@brownrudnick.com<<mailto:SDangelmajer@brownrudnick.com>>>
Sent: Friday, September 21, 2018 6:24 PM
To: Melissa Smith <melissa@gillamsmithlaw.com<<mailto:melissa@gillamsmithlaw.com>>>; Michael Stadnick <MStadnick@desmaraisllp.com<<mailto:MStadnick@desmaraisllp.com>>>; Jeffrey Seddon <JSeddon@desmaraisllp.com<<mailto:JSeddon@desmaraisllp.com>>>; Franco Silletta <FSilletta@desmaraisllp.com<<mailto:FSilletta@desmaraisllp.com>>>; John Desmarais <JDesmarais@desmaraisllp.com<<mailto:JDesmarais@desmaraisllp.com>>>; Ameet Modi <AModi@desmaraisllp.com<<mailto:AModi@desmaraisllp.com>>>; Brian Matty <BMatty@desmaraisllp.com<<mailto:BMatty@desmaraisllp.com>>>; Wesley White <WWhite@desmaraisllp.com<<mailto:WWhite@desmaraisllp.com>>>; Apple AGIS Service <AppleAGISService@desmaraisllp.com<<mailto:AppleAGISService@desmaraisllp.com>>>
Cc: AGIS-Lit <agislit@brownrudnick.com<<mailto:agislit@brownrudnick.com>>>
Subject: [Ext] AGIS Software Development LLC v. Huawei Device USA Inc., et al. Case No. 2:17-cv-0513-JRG (Lead Case)

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Counsel,

Attached please find Notices of Subpoena for Mr. Siegel and Mr. Griswold.

Regards,

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