

EXHIBIT 1 (Part B)

EXHIBIT C

Exhibit C for U.S. Patent No. 9,445,251 Against HUAWEI Accused Pr

In these Infringement Contentions, AGIS Software Development LLC (“AGIS”) contends that at least the following U.S. Patent No. 9,445,251 (the “251 Patent”) identified below are infringed by the Accused Products (*e.g.*, phones) that are manufactured, sold, offered for sale, and/or used by Huawei Device USA, Inc., Huawei Device Co., Ltd., and Huawei (Dongguan) Co., Ltd. (“Defendants” or “Huawei”).

The Accused Products comprise HUAWEI products running the Android mobile operating system and manufactured or sold during and after 2011. For example, the Accused Products comprise the following Android-based phones: Ascend D1, Ascend D1 Quad, Ascend D1 Quad XL, Ascend D2, Ascend G300, Ascend G350, Ascend G510, Ascend G526, Ascend G6, Ascend G600, Ascend G610, Ascend G615, Ascend G620, Ascend G620S, Ascend G630, Ascend G700, Ascend II, Ascend Mate, Ascend Mate 2 4G, Ascend Mate7, Ascend P1 LTE, Ascend P1 S, Ascend P2, Ascend P7 Mini, Ascend Q, Ascend W1, Ascend W2, Ascend Y, Ascend Y200, Ascend Y210, Ascend Y220, Ascend Y300, Ascend Y300II, Ascend Y320, Ascend Y330, Ascend Y511, Ascend Y520, Ascend Y530, Ascend Y540, Ascend Y600, Boulder, Discovery Expedition, G535, G6, G610, G630, G6600, G6620, G7010, G740, G8, GR3, GT3, Honor, Honor 6, Honor 6 Plus, Honor 7, Honor 8, Honor V8, Honor Note 8, Honor V9, Honor 8 Lite (32 GB), Honor 9, Honor 9i, Honor 7i, Honor 3X, Honor 4Play, Honor 4X, Honor 5X, Honor 6X (32GB and 64GB), Honor 7X, Honor 4C, Honor 5C, Honor 6C, Ideos X5, IDEOS S7, IDEOS X1, IDEOS X2, IDEOS X3, IDEOS X6, M228, M328, Mate, Mate 10, Mate 10 Lite, Mate 10 Porsche Design, Mate 10 Pro, Mate 8, Mate 9, Mate 9 Porsche Design, Mercury, Nova, Nova 2, Nova 2 Plus, Nova 2i, Nova Plus, P10, P10 Lite, P10 Plus, P6, P8, P8 Lite, P8 Lite 2017, P9 Lite, P9 Lite Mini, P9 Plus, PAL, Pillar, Pinnacle, Pinnacle 2, Premia 4G, SNAPTO, Sonic, Summit, U120, U121, U8100, U8110, U8150 IDEOS, U8230, U8300, U9200-1, U9500-1, U9510E, Union, Valiant, Verge, Vision, Vitality, Y3, Y3 2017, Y320, Y330, Y3II, Y5, Y530, Y550, Y560, Y5II, Y6, Y6 2017, Y6 Pro, Y625, Y635, Y6II, Y7, Y7 Pro, and any variants of the listed models thereof. AGIS reserves the right to amend this list of accused phones as discovery progresses. For example, the Accused Products comprise the following Android-based tablets: dtab d-01H, Honor X1, Honor Matebook, Matebook D, Matebook E, Matebook X, MediaPad, MediaPad 10 FHD, MediaPad 10 Link, MediaPad 10 Link LTE, MediaPad 10 Link Plus, MediaPad 7 Lite, MediaPad 7 Vogue, MediaPad 7 Youth, MediaPad 7 Youth, MediaPad M2, MediaPad M2 10-inch, MediaPad M2 8.0, MediaPad M3, MediaPad M3 lite 10, MediaPad S7 SL, MediaPad T1 7.0, MediaPad T1 8.0, MediaPad T1 8.0 WIFI, MediaPad T2 10.0 Pro, MediaPad T2 7.0, MediaPad X1, MediaPad X2, and any variants of the listed models thereof. AGIS reserves the right to amend this list of tablets as discovery progresses. For example, the Accused Products comprise HUAWEI products, including but not limited to the following:

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phones and tablets as described herein, running the following versions (and all intervening updates and sub-versi mobile operating system: Android 2.3, 4.0, 4.1, 4.2, 4.3, 4.4, 5.0, 5.1, 6.0, 7.0, 7.1, 8.0, and 8.1. For example, th comprise HUAWEI products, including but not limited to the phones and tablets as described herein, running an following Android-based applications and/or software: Android Device Manager, Find My Phone, Find My Dev Google Plus, Google Hangouts, Google Maps, Google Assistant, Google Search, Google Messages, Android Me Google Duo, Gmail, and Google Chrome. For example, the Accused Products comprise HUAWEI products, inc to the phones and tablets described herein, participating in any networks and/or services related to the execution Android mobile operating system versions and Android-based applications and/or software described herein.

AGIS does not concede that any claims of the '251 Patent that are not listed below are not infringed by th Moreover, the citations to certain documents and other information below are intended to be exemplary only and AGIS from citing or relying on additional documents, information, source code, and/or testimony at a later time. are preliminary in nature, and an analysis of HUAWEI's products, internal documentation, source code, and/or to relevant witnesses may more fully and accurately describe the infringing features of its accused products. Accor the right to supplement, correct, modify, and/or amend these contentions once such additional information is ma Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as discove progresses; in view of the Court's claim construction order(s); in view of any positions taken by HUAWEI, inclu to positions on claim construction, invalidity, and/or non-infringement; and in connection with the preparation an reports.

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1[P]. A computer-implemented method comprising:	<p>HUAWEI infringes directly and/or indirectly by performing, inducing others to perform to the performance of: a computer-implemented method [of claim 1].</p> <p>The Accused Products meet the claim limitations by providing device-location tracking features described below. For example, the Accused Products meet the claim limitation pre-installed with Android mobile operating systems containing code for providing devi features as provided in the claims limitations herein. For example, the Accused Product and/or software that run within the Android mobile operating system and that use comp mobile operating system to provide device-location tracking features. Upon information addition to the components and features of the Android mobile operating system itself, t</p>

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	<p>applications and/or software run within the Android mobile operating system and use co Android mobile operating system to provide device-location tracking features: Android Find My Device, Google Latitude, Google Plus, Google Hangouts (including Allo and I Google Chrome, Google Messages, and Android Messenger.</p> <p><u>Find My Device (also known as “Android Device Manager”)</u></p> <p>Android Device Manager is the predecessor to Find My Device and has been available a installed feature since 2013 and downloadable as a software application. The current ite Device, often called the “new and improved Android Device Manager” or “rebranded A Manager” is now part of the standard Google Play Protect suite, which is “built in and e devices,” <i>i.e.</i>, the Accused Products running Android OS. Upon information and belief, method also uses and/or works in conjunction with functionalities associated with Goog Messages, Android Messenger, Google Chrome, Location Access, and other features, w installed on the Accused Products. For the purposes of avoiding needlessly presenting c duplicative evidence, AGIS sets forth the Find My Device feature of the Accused Produ of this first exemplary method. AGIS reserves the right to supplement these contentions defendant requires additional information in accordance with P.R. 3-1 and for any other where Find My Device may not be pre-installed as a stand-alone “app,” the functionality the Google Chrome browser, which is preinstalled on all Android devices. Find My De both the native app as well as the Chrome browser version, which appears to be identica</p> <p><i>See, e.g.,</i> https://www.androidcentral.com/find-my-device; https://support.google.com/android/answer/6160491?hl=en; https://android.googleblog.com/your-lost-phone-with-android.html; https://play.google.com/store/apps/details?id=com.google.android.apps.adm&hl=en; https://www.blog.google/products/android/google-play-protect/</p> <p><u>Google Maps Share Location</u></p> <p>Share Location is currently included as a standard feature on the Accused Devices opera Google Maps. Google Maps is a pre-installed software application in Android OS. The</p>

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