

EXHIBIT 1-A

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

AGIS SOFTWARE DEVELOPMENT
LLC,

Plaintiff,

v.

HUAWEI DEVICE USA INC., HUAWEI
DEVICE CO., LTD. AND HUAWEI
DEVICE (DONGGUAN) CO., LTD.,

Defendants.

Civil Action No. 2:17-CV-513-JRG
(Lead Case)

JURY TRIAL DEMANDED

AGIS SOFTWARE DEVELOPMENT
LLC,

Plaintiff,

v.

LG ELECTRONICS, INC.,

Defendants.

Civil Action No. 2:17-CV-515-JRG
(Consolidated Case)

JURY TRIAL DEMANDED

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS**

Plaintiff AGIS Software Development LLC (“AGIS”) hereby makes the following infringement disclosures under the Patent Local Rules with respect to United States Patent Nos. 9,467,838 (the “838 Patent”), 9,445,251 (the “251 Patent”), 9,408,055 (the “055 Patent”), and 8,213,970 (the “970 Patent”) (collectively, “patents-in-suit”). AGIS’s investigation is ongoing and discovery has not yet commenced. Accordingly, these disclosures are based on information available to AGIS at this time. AGIS reserves the right to supplement this disclosure after further

discovery from the defendants and non-parties, particularly documents and other discovery regarding the LG Accused Products set forth below. AGIS also reserves the right to assert additional claims of the patents-in-suit, accuse different products, or find alternative literal and/or equivalent infringing elements in the LG Accused Products.

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO PATENT LOCAL RULE 3-1

A. ASSERTED CLAIMS

Defendant LG Electronics, Inc. (“Defendant” or “LG”) has infringed and continues to infringe at least the following claims of the patents-in-suit in connection with the LG Accused Products set forth below:

- Claims 1–54 of the ’838 Patent;
- Claims 1–35 of the ’251 Patent;
- Claims 1–54 of the ’055 Patent; and
- Claims 1 and 3–9 of the ’970 Patent.

AGIS reserves the right to seek leave of court to add, delete, substitute, or otherwise amend this list of asserted claims should further discovery, the Court’s claim construction, or other circumstances so merit.

B. ACCUSED INSTRUMENTALITIES

AGIS is currently aware that the following LG Accused Products infringe each of the patents-in-suit either alone or in concert with one or more other LG Accused Products:

- V30 (H931, LS998U, H932, H932U, VS996, US998, AS998),
- X charge (US601, SP320, M327, M322),
- Q6 (US700),
- G6+ (US997U),
- G6 (US997, VS988, AS993, H871, H872, LS993),

- Fiesta 2 (L173BL, L164VL)
- V20 (LS997, H910, H918, US996, VS995)
- X venture (US701, H700), Stylo 3 (LS777)
- Stylo 3 Plus (MP450, TP450)
- Tribute HD (LS676)
- Rebel 2 (L57BL, L58BL, L58VL)
- Fiesta LTE (L63BL, L64VL)
- Stylo 3 LTE (L83BL, L84VL)
- K20 plus (MP260, TP260)
- Grace LTE (L59BL)
- K3 (AS110, US110, LS450)
- Stylo 3 (LS777, M430)
- Phoenix 3 (M150)
- Risio 2 (M154)
- K8 2017 (US215)
- Stylo 2 V (VS835)
- K20 (M255, RS501)
- K20 V (VS501)
- Aristo (M210)
- Harmony (M257)
- G5 (VS987, AS992, H820, H830, LS992, RS988, US992)

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