

# EXHIBIT 1-B

## Exhibit C for U.S. Patent No. 9,445,251 Against LG Accused Products

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 LG Electronics, Inc. (“LG”).

The Accused Products comprise LG products running the Android mobile operating system and manufactured during and after 2011. For example, the Accused Products comprise the following Android-based phones: V30 (US997U), H932, H932U, VS996, US998, AS998), X charge (US601, SP320, M327, M322), Q6 (US700), G6+ (US997U), AS993, H871, H872, LS993), Fiesta 2 (L173BL, L164VL), V20 (LS997, H910, H918, US996, VS995), X venture (LS997, M430), Stylo 3 (LS777), Stylo 3 Plus (MP450, TP450), Tribute HD (LS676), Rebel 2 (L57BL, L58BL, L58VL), Fiesta 1 (L64VL), Stylo 3 LTE (L83BL, L84VL), K20 plus (MP260, TP260), Grace LTE (L59BL), K3 (AS110, US110, LS777, M430), Phoenix 3 (M150), Risio 2 (M154), K8 2017 (US215), Stylo 2 V (VS835), K20 (M255, RS501), Aristo (M210), Harmony (M257), G5 (VS987, AS992, H820, H830, LS992, RS988, US992), Aristo Silver (MS210), Blue (MS210UK), Stylo 2 Plus (MS550BK, K550), Fortune (M153), Tribute HD (LS676), X power (K212, K450), K10 (MS428, K425, K428SG), Stylo 2 (LS775, K540), G Vista (VS880), Escape 3 (K373), Classic (L18VC), Rebel (L44VL), Treasure LTE (L51AL, L52VL), Premier LTE (L61AL, L62VL), Stylo 2 LTE (L82VL), K7 (MS330, AS330), (RS500, US375), G4 (US991), K4 (VS425), Optimus Zone 3 (VS425PP), K8 V (VS500, VS500PP), Phoenix 2 (LS675), Spree (K120), G Vista 2 (H740), Escape 2 (H443), Risio (H343), Access LTE (L31L), Leon LTE (H343), (H631, MS631, H634, LS770), Volt 2 (LS751), Tribute 2 (LS665), Escape 2 (H445), Logos (US550), Transpyre (D850, LS990, D851, AS985, VS985, AS990, US990), Ultimate 2 (L41C), Tribute (LS660), G3 Vigor (D725), K4 Vista (D631), Volt (LS740), Optimus Fuel (L34C), Optimus L90 (D415), Optimus F3Q (D520), D820 (D820), C8 (D801, LS980), Optimus F6 (D500), Enact (VS890), Optimus F3 (VM720, LS720), Rumor Reflex S (LN272S), C8 (US780), Optimus F5 (AS870), Optimus G Pro (E980), Lucid2 (VS870), Spirit 3G (MS870), LGE960 (LGE960), (LW770), Mach (LS860), Optimus G (LS970, E970), Optimus L9 (P769), Venice (LG730), Escape (P870), Spectra (MS695), Splendor (US730), Intuition (VS950), Motion 4 (MS770), Optimus Plus (AS695), Elite (LS696), Viper (LS840), (MS695), Lucid (VS840), Nitro (P930), Spectrum (VS920), Marquee (LG855), Connect 4G (MS830), Optimus C (AS680), Ignite (AS855), myTouch Q (LGC800DG, LGC800VL), Optimus One (P504), myTouch (LGE739B), (C729), Optimus Slider (VM701), Esteem (MS910), Enlighten (VS700), Marquee (LS855), Thrill 4G (P925), Rumor Genesis (US760), G2x (P999), Thrive (P506), Phoenix (P505), Optimus C (LW690), Optimus V (WM670), Optimus M (MS690), Axis (LGAS740), Apex (US740), Vortex (VS660), Optimus S (LS670), Ally (VS740), and

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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: G Pad F2 8.0 (LK460), G Pad X II 8.0 Plus (V530), G Pad X II 10.1 (UK730), G Pad X II 10.1 1st Gen (AK495, UK495), G Pad X 8.0 (V520, V521), G Pad II 10.1 Full HD (V940N), G Pad X 10.1 (V930), G Pad X 10.1 1st Gen (AK495, UK495), G Pad 8.0 (V480), G Pad 10.1 (V700), G Pad 7.0 (V400), G Pad F 8.0 1st Gen (AK495, V495, V496, UK495), G Pad F 8.0 2nd Gen (VK810), G Pad F 7.0 (LK430), G Pad 7.0 LTE (VK410, UK410, V410), G Pad 10.1 LTE (VK700), G Pad 8.3 (V510), G Pad 8.3 Black (V500). AGIS reserves the right to amend this list of accused tablets as discovery progresses. The Accused Products comprise LG products, including but not limited to the phones and tablets as described herein, running the following versions (and all intervening updates and sub-versions) of the Android mobile operating system: Android 4.3, 4.4, 5.0, 5.1, 6.0, 7.0, 7.1, 8.0, and 8.1. For example, the Accused Products comprise LG products, including but not limited to the phones and tablets as described herein, running any versions of the following Android-based applications and/or services: Device Manager, Find My Phone, Find My Device, Google Latitude, Google Plus, Google Hangouts, Google Maps, Google Search, Google Messages, Android Messenger, Google Allo, Google Duo, Gmail, and Google Chrome. The Accused Products comprise LG products, including but not limited to the phones and tablets described herein, providing mobile networks and/or services related to the execution and/or use of the Android mobile operating system versions and/or 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 the Accused Products. Moreover, the citations to certain documents and other information below are intended to be exemplary only and are not intended to bind AGIS from citing or relying on additional documents, information, source code, and/or testimony at a later time. The Accused Products are preliminary in nature, and an analysis of LG's products, internal documentation, source code, and/or testimony of witnesses may more fully and accurately describe the infringing features of its accused products. Accordingly, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions once such additional information is made available. Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as discovery progresses; in view of the Court's claim construction order(s); in view of any positions taken by LG, including but not limited to positions on claim construction, invalidity, and/or non-infringement; and in connection with the preparation and filing of reports.

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1[P]. A computer-implemented method	LG infringes directly and/or indirectly by performing, inducing others to perform, and/or the performance of: a computer-implemented method [of claim 1].

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<p>comprising:</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 device-location tracking features as provided in the claims limitations herein. For example, the Accused Products include hardware and/or software that run within the Android mobile operating system and that use components of the Android mobile operating system to provide device-location tracking features. Upon information and belief, in addition to the components and features of the Android mobile operating system itself, the Accused Products include applications and/or software run within the Android mobile operating system and use components of the Android mobile operating system to provide device-location tracking features: Android Device Manager, Find My Device, Google Latitude, Google Plus, Google Hangouts (including Allo and Duo), Google Chrome, Google Messages, and Android Messenger.</p> <p><b><u>Find My Device (also known as “Android Device Manager”)</u></b></p> <p>Android Device Manager is the predecessor to Find My Device and has been available as a pre-installed feature since 2013 and downloadable as a software application. The current iteration of Find My Device, often called the “new and improved Android Device Manager” or “rebranded Android Device Manager” is now part of the standard Google Play Protect suite, which is “built in and available on all Android devices,” <i>i.e.</i>, the Accused Products running Android OS. Upon information and belief, the Find My Device method also uses and/or works in conjunction with functionalities associated with Google Messages, Android Messenger, Google Chrome, Location Access, and other features, which are pre-installed on the Accused Products. For the purposes of avoiding needlessly presenting duplicative evidence, AGIS sets forth the Find My Device feature of the Accused Products as an example of this first exemplary method. AGIS reserves the right to supplement these contentions with additional evidence if the defendant requires additional information in accordance with P.R. 3-1 and for any other reason. In those instances where Find My Device may not be pre-installed as a stand-alone “app,” the functionality of Find My Device is provided by the Google Chrome browser, which is preinstalled on all Android devices. Find My Device is available on both the native app as well as the Chrome browser version, which appears to be identical.</p> <p><i>See, e.g.</i>, <a href="https://www.androidcentral.com/find-my-device">https://www.androidcentral.com/find-my-device</a>;  <a href="https://support.google.com/android/answer/6160491?hl=en">https://support.google.com/android/answer/6160491?hl=en</a>; <a href="https://android.googleblog.com/">https://android.googleblog.com/</a></p>

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	<p>your-lost-phone-with-android.html;  <a href="https://play.google.com/store/apps/details?id=com.google.android.apps.adm&amp;hl=en">https://play.google.com/store/apps/details?id=com.google.android.apps.adm&amp;hl=en</a>;  <a href="https://www.blog.google/products/android/google-play-protect/">https://www.blog.google/products/android/google-play-protect/</a></p> <p><b><u>Google Maps Share Location</u></b></p> <p>Share Location is currently included as a standard feature on the Accused Devices operating system. Google Maps is a pre-installed software application in Android OS. The Accused Products have included the Share Location functionalities since 2009 as part of Google Latitude, a feature for Google Maps on Android OS-based mobile devices, such as the Accused Products. Location functionalities were briefly shifted from Latitude for Google Maps to Google Hangouts, until reappearing as a standard feature in Google Maps. Upon information and observation, the Share Location method also uses and/or works in conjunction with functionalities associated with Google Messages, Android Messenger, Location Access, and other features, which are present in the Accused Products. For the purposes of these contentions, AGIS sets forth Google Maps Share Location as a feature of the Accused Products as representative of this exemplary software. AGIS reserves the right to supplement these contentions to the extent that defendant requires additional information. P.R. 3-1 and for any other reason.</p> <p><i>See, e.g.,</i> <a href="https://techcrunch.com/2017/03/22/google-maps-now-lets-you-share-your-location-and-family-for-a-specific-period-of-time/">https://techcrunch.com/2017/03/22/google-maps-now-lets-you-share-your-location-and-family-for-a-specific-period-of-time/</a>; <a href="https://googleblog.blogspot.com/2009/02/see-how-we-are-with-google.html">https://googleblog.blogspot.com/2009/02/see-how-we-are-with-google.html</a>; <a href="https://googleblog.blogspot.jp/2013/07/a-new-google-maps-app-for-android.html">https://googleblog.blogspot.jp/2013/07/a-new-google-maps-app-for-android.html</a>; <a href="http://googleplusproject.blogspot.com/2013/05/google-for-android-42.html">http://googleplusproject.blogspot.com/2013/05/google-for-android-42.html</a>; <a href="https://googleblog.blogspot.com/2013/10/google-hangouts-and-photos-save-some.html">https://googleblog.blogspot.com/2013/10/google-hangouts-and-photos-save-some.html</a></p>

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