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

AGIS SOFTWARE DEVELOPMENT, LLC	§	CASE NO. 2:17-cv-514-JRG
	§	(Lead Case)
Plaintiff,	§	
	§	
v.	§	**JURY TRIAL DEMANDED**
	§	
HTC CORPORATION, et al.	§	
	§	
Defendant.	§	
AGIS SOFTWARE DEVELOPMENT, LLC	§	CASE NO. 2:17-CV-515-JRG
	§	(Member Case)
	§	
Plaintiff,	§	
v.	§	**JURY TRIAL DEMANDED**
	§	
LG ELECTRONICS INC.	§	
	§	
Defendant.	§	

**DECLARATION OF NICHOLAS H. LEE IN SUPPORT OF DEFENDANT LG
ELECTRONICS INC.'S MOTION FOR SUMMARY JUDGMENT THAT U.S. PATENT
NO. 7,630,724 MAY NOT BE RELIED UPON TO SHOW THAT U.S. APPLICATION
NO. 14/027,410 PROVIDES WRITTEN DESCRIPTION SUPPORT FOR U.S. PATENT
NOS. 9,408,055; 9,445,251; AND 9,467,838**

I, Nicholas H. Lee, state and declare as follows:

1.   I am a member of Arnold & Porter Kaye Scholer, LLP ("APKS"), counsel of

record for Defendant LG Electronics Inc. ("LGEKR"). I am a member of the Bar of the State of

California and have been admitted to practice in the United States District Court for the Eastern

District of Texas ("EDTX"). I provide this declaration in support of Defendant LGEKR's

Motion for Summary Judgment that U.S. Patent No. 7,630,724 May Not Be Relied Upon to

Show That U.S. Application No. 14/027,410 Provides Written Description Support for U.S.

Patent Nos. 9,408,055; 9,445,251; and 9,467,838. I have personal knowledge of the matters

stated in this declaration and would testify competently and truthfully to them if called upon to do so.

2.   Attached hereto as Exhibit 1 is a true and correct copy of U.S. Patent No. 9,408,055.

3.   Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No. 9,445,251.

4.   Attached hereto as Exhibit 3 is a true and correct copy of U.S. Patent No. 9,467,838.

5.   Attached hereto as Exhibit 4 is a true and correct copy of U.S. Patent Application No. 14-027,410.

6.   Attached hereto as Exhibit 5 is a true and correct copy of the Decision Denying Institution of *Inter Partes* Review of the '251 Patent in *Apple Inc. v. AGIS Software Development LLC*, IPR2018-00817 (P.T.A.B. Oct. 3, 2018) (Paper 9).

7.   Attached hereto as Exhibit 6 is a true and correct copy of the Decision Instituting *Inter Partes* Review of the '838 Patent in *Apple Inc. v. AGIS Software Development LLC*, IPR2018-00819 (P.T.A.B. Nov. 7, 2018) (Paper 9).

8.   Attached hereto as Exhibit 7 is a true and correct copy of the Decision Denying Institution of *Inter Partes* Review of the '055 Patent in *Apple Inc. v. AGIS Software Development LLC*, IPR2018-00818 (P.T.A.B. Oct. 3, 2018) (Paper 9).

9.   Attached hereto as Exhibit 8 is a true and correct copy of an excerpt from The New Oxford American Dictionary (2001) which provides a definition for the term "which."

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los

Angeles, California on January 25, 2019.

/s/ Nicholas H. Lee
Nicholas H. Lee
Attorney for Defendant LG Electronics Inc.