

EXHIBIT A

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

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

HTC CORPORATION,

Defendant.

Case No. 2:17-cv-00514-JRG
(Lead Case)

JURY TRIAL DEMANDED

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

LG ELECTRONICS, INC.,

Defendant.

Case No. 2:17-cv-00515-JRG
(Member Case)

JURY TRIAL DEMANDED

**DEFENDANT LG ELECTRONICS, INC.'S AMENDED INVALIDITY CONTENTIONS
PURSUANT TO PATENT LOCAL RULE 3-6**

I. INTRODUCTION

Pursuant to Local Patent Rule (“P.R.”) 3-6, Defendant LG Electronics, Inc. (“LGEKR” or “Defendant”) hereby serves its Amended Invalidity Contentions on Plaintiff AGIS Software Development LLC (“AGIS” or “Plaintiff”). Defendant’s investigation related to the above-captioned case is continuing, and, as such, these contentions and disclosures are based on information reasonably obtained by Defendant to date. Defendant reserves the right to supplement or modify these contentions, consistent with any applicable Court order.

AGIS has asserted the following patents and claims against Defendant in this case:

- claims 1, 3, 5, and 8 of U.S. Patent No. 8,213,970 (the “’970 Patent”);
- claims 1, 2, 7, 22, 24, 28, 32, 36, 42, 49, and 54 of U.S. Patent No. 9,408,055 (the “’055 Patent”);
- claims 1, 5, 6, 12, 15, 19, 24, 27, 29, 31, and 35 of U.S. Patent No. 9,445,251 (the “’251 Patent”); and
- claims 1, 5, 7, 10, 15, 18-20, 27, 38, 40, and 54 of U.S. Patent No. 9,467,838 (the “’838 Patent”)

The ’970 Patent, ’055 Patent, ’251 Patent, and ’838 Patent are collectively referred to herein as the “patents-in-suit” and the claims identified above are collectively referred to herein as the “asserted claims.”

Defendant’s Invalidity Contentions are based in whole or in part on their present understanding of AGIS’s contentions concerning the scope and construction of the asserted claims, including from AGIS’s Infringement Contentions, and Defendants’ own understanding of the scope and construction of those claims. AGIS’s Infringement Contentions are deficient at least insofar as they fail to articulate how any single accused product or application (or its use)

Claim 32:

- “wherein the first device uses an Internet Protocol to transmit the user-specified symbol, location, and information associated with the [second] entity.”

Claim 36:

- “wherein the database is stored on the first server.”

Claim 39:

- “wherein the message including the identifier corresponding to the group is a first message, and wherein the method further comprises performing by the first device: sending, to a particular second device via the first server, a second message related to remotely controlling the particular second device to perform an action, wherein the particular second device is configured to perform the action based on receiving the second message.”

Claim 47:

- “wherein the information associated with the facility comprises a uniform resource locator (URL) of a web site associated with the facility.”

Claim 48:

- “further comprising performing, by the first device: identifying user interaction with the interactive display selecting the symbol corresponding to the facility and user interaction with the display specifying an action, and based thereon, loading a web page associated with the facility.”

Claim 51:

- “wherein the first server is the second server.”

B. Patent Local Rule 3-3(a)-(c) Initial Disclosures

Pursuant to P.R. 3-3(a), and as detailed below and in the attached Exhibits, Defendant contends that the asserted claims of the patents-in-suit are invalid as anticipated and/or obvious under (pre-AIA and/or AIA) 35 U.S.C. §§ 102 and 103 over at least the following prior art.

Exhibit (Chart)	Reference	Inventor or Author	Date of Issue or Publication or Public Use / Availability	Filing Date
A-1	U.S. Patent Application	Ordille et al.	Nov. 20, 2003	June 26, 2002

	Publication No. US 2003/0217109			
A-2	U.S. Patent Application Publication No. US 2008/0219416	Roujinsky	Sept. 11, 2008	Feb. 15, 2008
A-3	U.S. Patent No. 7,609,669	Sweeney	Oct. 27, 2009	Feb. 14, 2005
A-4	U.S. Patent No. 7,386,589	Tanumihardja et al.	June 10, 2008	June 27, 2001
A-5	U.S. Patent No. 6,816,878	Zimmers et al.	Nov. 9, 2004	Feb. 11, 2000
A-9	U.S. Patent No. 7,912,913	Accapadi et al.	Mar. 22, 2011	Sept. 15, 2005
A-8	U.S. Patent No. 7,619,584	Wolf	Nov. 17, 2009	Sept. 8, 2006
A-10	WO 2008/1188878	Swanburg et al.	Oct. 2, 2008	Mar. 24, 2008
C-1 E-1 G-1	U.S. Patent Application Publication No. US 2007/0281690	Altman et al.	Dec. 6, 2007	June 1, 2006
C-5 E-5 G-5	U.S. Patent No. 6,867,733	Sandhu et al.	Mar. 15, 2005	Apr. 9, 2001
C-5 E-5 G-5	U.S. Patent No. 7,271,742	Sheha et al.	Sept. 18, 2007	Mar. 3, 2003
C-6 E-6 G-6	U.S. Patent No. 7,450,003	Weber et al.	Nov. 11, 2008	Feb. 24, 2006
C-4 E-4 G-4	U.S. Patent Application Publication No. US 2002/0115453	Poulin et al.	Aug. 22, 2002	Feb. 15, 2002
C-3 E-3 G-3	U.S. Patent No. 7,917,866	Karam	Mar. 29, 2011	Dec. 30, 2005
C-2 E-2 G-2	U.S. Patent No. 7,330,112	Emigh et al.	Feb. 12, 2008	Sept. 9, 2004

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