

EXHIBIT 3

AGIS further states that information responsive to this Interrogatory will be produced in AGIS's expert reports in accordance with this Court's scheduling order. Discovery in this case is still ongoing and AGIS continues to investigate this matter. AGIS reserves the right to supplement the answer to this Interrogatory upon the resolution of the above objections.

Further, the statement "Find My Device is not installed on any HTC Corporation-made phone and Device Manager (Find My Device's predecessor)" conflicts with statements made during the deposition of Steven Teng and presented in Exhibits 11- See Teng Deposition Transcript at 71:15-74:24; 82:5-85:20; 63:6-19.

INTERROGATORY NO. 20

HTC Corporation does not make, use, offer to sell, or sell smartphones in the United States or import smartphones into the United States. For each of the asserted claims of the '055, '251, '838, and '970 patents, separately identify the party or parties that AGIS contends directly infringe each patent, and which activity or activities from 35 U.S.C. § 271(a) (i.e., "makes . . . within the United States", "uses . . . within the United States," "offers to sell . . . within the United States," "sells . . . within the United States," or "imports into the United States") constitute the infringing acts. Identify the documents that demonstrate these activities.

RESPONSE TO INTERROGATORY NO. 20

AGIS hereby incorporates the General Objections as if fully set forth herein.

AGIS objects to this Interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of this case because the burden or expense of the proposed discovery outweighs its likely benefit.

AGIS objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, attorney work product doctrine, and/or any other applicable privilege.

AGIS objects to this Interrogatory on the ground it seeks information that is the topic of expert discovery.

AGIS objects to this Interrogatory as seeking information that is properly the subject of expert reports before the deadline for such disclosures.

AGIS objects to this Interrogatory to the extent it calls for a legal conclusion.

AGIS objects to this Interrogatory because it is cumulative and duplicative as it seeks the discovery of information that HTC has already obtained through AGIS's Disclosure of Asserted Claims and Infringement Contentions pursuant to P.R. 3-1.

Subject to and without waiving its general and specific objections, AGIS incorporates by reference as if fully set forth herein its Disclosure of Asserted Claims and Infringement Contentions and Amended Disclosure of Asserted Claims and Infringement Contentions, served on January 19, 2018 and May 25, 2018, respectively. AGIS will supplement its response to this Interrogatory, if necessary, once the Court and/or the parties clarify the scope of the claims by virtue of the claim construction process.

INTERROGATORY NO. 21

Explain AGIS's basis, and identify all documents in support of AGIS's basis, for contending that HTC Corporation induces others to infringe each of the '055, '251, '838, and '970 patents under 35 U.S.C. § 271(b), including an identification of the party or parties that perform the alleged direct infringement and an identification of the activities conducted by HTC Corporation that you claim demonstrate a specific intent of HTC Corporation to encourage direct infringement, including HTC Corporation's knowledge of the '055, '251, '838, and '970 patents, knowledge that the induced acts constitute direct infringement of the '055, '251, '838, and '970 patents, and the affirmative steps taken by HTC Corporation to bring about direct infringement.

RESPONSE TO INTERROGATORY NO. 21

AGIS hereby incorporates the General Objections as if fully set forth herein.

AGIS objects to this Interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of this case because the burden or expense of the proposed discovery outweighs its likely benefit.

AGIS objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, attorney work product doctrine, and/or any other applicable privilege.

AGIS objects to this Interrogatory on the ground it seeks information that is the topic of expert discovery.

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AGIS objects to this Interrogatory because it is cumulative and duplicative as it seeks the discovery of information that HTC has already obtained through AGIS's Disclosure of Asserted Claims and Infringement Contentions pursuant to P.R. 3-1.

AGIS identifies the following documents from which information responsive to this Interrogatory may be obtained: *AGIS Software Development, LLC v. HTC Corporation*, 2:17-cv-00514-JRG, Dkt. 1 (E.D. Tex. June 21, 2017) (the "Complaint"); see 2018-11-28 Letter Rubino to Bernstein re 970 Patent.

AGIS further states that information responsive to this Interrogatory will be produced in AGIS's expert reports in accordance with this Court's scheduling order. Discovery in this case is still ongoing and AGIS continues to investigate this matter. AGIS reserves the right to supplement the answer to this Interrogatory upon the resolution of the above objections.

INTERROGATORY NO. 22

Claims 1 and 54 of the '838 patent require the following claim limitations:

"participating in the group, wherein participating in the group includes sending first location information to a first server and receiving second location information from the first server"

and

"sending, to a second server, a request for second georeferenced map data different from the first georeferenced map data"

Identify: (a) whether AGIS alleges that an HTC Corporation-made phone or a server performs the "sending, to a second sever;" (b) what accused instrumentality AGIS contends is the claimed

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