EXHIBIT 7

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

		§	
AGIS SOFTWARE DEVELOPMENT		§	
LLC,		§	
		§	
	Plaintiff,	§	Civil Action No. 2:17-CV-514-JRG
		§	(Lead Case)
v.		§	
		§	JURY TRIAL DEMANDED
HTC CORPORATION,		§	
		§	
	Defendant.	§	
		§	

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 HTC 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 HTC Accused Products.



- Vivid
- Wildfire
- Wildfire (CDMA)
- Wildfire CDMA
- Wildfire S
- Wildfire S (CDMA)
- Wildfire S (GSM)
- Wing / P4350 (Herald)
- xda II / MDA II
- FLYER
- JETSTREAM
- FLYER WI-FI
- EVO View 4G
- FLYER CDMA
- Desire 12
- Desire 12+

AGIS reserves the right to amend this list of accused instrumentalities, as well as other information contained in this document and the exhibits hereto, to incorporate new information learned during the course of discovery, including, but not limited to, the inclusion of newly-released products or any other equivalent devices ascertained through discovery.

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C. CLAIM CHARTS

Claim charts identifying a location of every element of every asserted claim of the patents-in-suit within HTC Accused Products are attached hereto as Exhibits A–D.¹ AGIS believes that the citations in the claim charts are representative of all HTC Accused Products. For example, where AGIS cites reference material or images representing a phone or tablet, that citation is representative for all other such phones or tablets including all prior and future versions unless otherwise noted. AGIS reserves the right to amend these claim charts as well as other information contained in this document and the exhibits hereto, to incorporate new information learned during the course of discovery, including, but not limited to, information that is not publically available or readily discernible without discovery. AGIS further reserves the right to amend these claim charts, as well as other information contained in this document and the exhibits attached hereto, pursuant to Patent Local Rules 3-1(g) and 3-6.

D. LITERAL INFRINGEMENT AND DOCTRINE OF EQUIVALENTS

AGIS asserts that, under the proper construction of the asserted claims and their claim terms, the limitations of the asserted claims of the patents-in-suit are literally present in the HTC Accused Products as set forth in the claim charts attached hereto as Exhibits A–D. AGIS contends that any and all elements found not to be literally infringed are infringed under the



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¹ Exhibits B-D, previously served on January 19, 2018, remain the operative claim charts. An amended Exhibit A is attached hereto.

doctrine of equivalents because the differences between the claimed inventions and the accused instrumentalities, if any, are insubstantial.

AGIS contends that HTC directly infringes the asserted claims by making, using, offering for sale, selling, and importing in to the United States the accused instrumentalities as well as indirectly infringe by contributing to and/or inducing others (e.g., HTC customers or its HTC customers' customers) to directly infringe those claims by making, using, offering for sale or selling the HTC Accused Products. AGIS contends that HTC directly infringes the asserted claims by testing the HTC Accused Products in the United States. AGIS contends that HTC infringes the asserted claims by contributing to and/or inducing Mobile Network Operators (MNOs) and/or jointly-and-directly infringing the asserted claims with MNOs by making, using, offering for sale, selling, and importing in to the United States the accused instrumentalities.

Pursuant to Patent Local Rule 3-6(a)(1), AGIS reserves the right to amend its Infringement Contentions as to literal infringement or infringement under the doctrine of equivalents, e.g., in light of the Court's claim construction.

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