EXHIBIT 16

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

AGIS SOFTWARE DEVELOPMENT LLC,	§ §	
	§	Case No. 2:17-CV-0513-JRG
Plaintiff,	§	(Lead Case)
	§	
V.	§	
	§	JURY TRIAL DEMANDED
HUAWEI DEVICE USA INC., HUAWEI	§	
DEVICE CO., LTD. AND HUAWEI	§	
DEVICE (DONGGUAN) CO., LTD.,	§	
	§	

Defendant.

NOTICE OF DEPOSITION OF HTC CORPORATION PURSUANT TO RULE 30(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff AGIS Software Development LLC ("AGIS"), by and through its counsel of record, will take the oral deposition of Defendant HTC Corporation ("HTC"), through one or more of their officers, directors, or managing agents, or other persons who consent to testify on their behalf, with regards to the matters set forth in the attached <u>Schedule A</u>. Plaintiff requests that Defendant identify in writing at least seven (7) days in advance of the deposition the person(s) designated by Defendant to testify on its behalf, the job title of such person(s), and the topic(s) on which each such person(s) will testify.

The deposition will commence on March 22, 2018, at 9:00 A.M. EST at the offices of Brown Rudnick LLP, 7 Times Square, New York, NY 10036, or at such other time and place as may be agreed by counsel. The deposition will be taken before a qualified notary public or other officer authorized by law to administer oaths, and will continue from day-to-day, excluding

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45. The correlation of internal and external name(s) and internal and external model number(s) of each HTC Accused Product with the yearly quarter sales, revenue, cost, profit, and pricing for each HTC Accused Product dating back to 2011.

46. The business relationship between Defendant and the suppliers of components to the HTC Accused Products, including but not limited to: the contents of any agreements signed between Defendant and the suppliers, including the effective date, terms, subject matter and/or termination of any such agreement; and, the number of HTC Accused Products, or components thereof, purchased from each supplier and the cost of purchasing or acquiring such components.

47. Any agreements, licenses, and contracts, including attachments or exhibits thereto, produced by Defendant for This Action.

48. The business structures of HTC Corporation, including without limitation the corporate structure and parent-subsidiary relationship with other entities; the corporate officers of each entity within the parent-subsidiary relationship of HTC Corporation; and the distribution of any income, revenues, profits, or other payments between each entity within the parent-subsidiary relationship of HTC Corporation.

49. Any market surveys or studies regarding the Accused Instrumentalities, including but not limited to market surveys or studies regarding consumer preferences or demand in purchasing the Accused Instrumentalities with and without certain features of the HTC Accused Products and HTC Accused Technology.

50. The value that consumers attribute to any features of the HTC Accused Products and HTC Accused Technology.

51. Any advertisements, television and internet commercials, social media content, or other promotional materials related to the Accused Instrumentalities and any features of the Accused Instrumentalities;

52. The pricing and/or discounting of the Accused Instrumentalities including any research, analysis, and other materials used or involved in the determination of such pricing and discounting.

53. The first date on which each Accused Instrumentality was manufactured, sold, offered for sale, and/or imported into the U.S., and the last date if no longer manufactured, sold, offered for sale and/or imported into the U.S.

54. Defendant's awareness of and communications regarding Advanced Ground Information Systems, Inc. v. Life360, Inc., Case No. 9:14-cv-80651-DMM (S.D. Fla.).

55. Defendant's awareness of, including the first awareness of, and communications regarding the Asserted Patents and any Related Patents.

56. Defendant's policies and practices relating to efforts to investigate or monitor patents that the HTC Accused Products may infringe.

57. Any patent licenses or covenants not to sue relating to the Accused Instrumentalities.

58. Defendant's responses to each of Plaintiff's interrogatories and exhibits thereto, including their content and how that content was gathered.

59. The document retention policies both before and after the filing of this action, including any policy regarding document creation, retention, and destruction related to electronic and/or physical documents.

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60. The identities and locations of the persons likely to have knowledge of the foregoing topics.

61. The identities and locations of documents and things pertaining to the foregoing topics.

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