## EXHIBIT 19

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December 4, 2018

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## VIA EMAIL: VRUBINO@BROWNRUDNICK.COM

Vincent J. Rubino, III Brown Rudnick LLP 7 Times Square New York, NY 10036

## Re: AGIS Software Development, LLC v. HTC Corp. Case No. 2:17-cv-0514 (E.D. Tex.) (Lead Case)

Dear Vincent:

Thank you for your letter dated November 28, 2018. Unfortunately, your letter only reinforces that AGIS's pre-suit claims on the '970 patent have been brought in bad faith.

It is black letter law that there cannot be induced infringement without notice of the patents-insuit. There was no pre-suit notice, and AGIS's pre-suit inducement claims are therefore frivolous as a matter of law. Likewise, it is black letter law, that in order to directly infringe a patent, a defendant must make, use, sell, offer for sale, or import an accused device in the United States. It is undisputed that HTC Corp. does none of these things in the United States. Moreover, none of the accused devices even have the accused Find My Device or Device Manager applications.

AGIS's infringement claim is at most limited to an inducement case <u>from the time of filing of</u> <u>suit</u>. We asked AGIS to so stipulate, but AGIS refused. Accordingly, HTC Corp. will be moving on the issue and we will be seeking our fees.

Regards,

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Matthew C. Bernstein