

EXHIBIT 3

**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. | § | <u>JURY TRIAL DEMANDED</u> |
| | § | |
| HUAWEI DEVICE USA INC., ET AL., | § | |
| | § | |
| Defendants. | § | |
| | § | |

**PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC’S FIRST SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO DEFENDANT HTC CORPORATION’S
FIRST SET OF INTERROGATORIES TO PLAINTIFF (NOS. 1-15)**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff AGIS Software Development LLC (“AGIS” or “Plaintiff”) hereby supplements its response to Defendant HTC Corporation’s (“HTC”) First Set of Interrogatories to Plaintiff (Nos. 1-15) in writing, under oath, and in accordance with the following definitions and instructions. These Interrogatories are continuing in nature and require supplementation in accordance with the Federal Rules of Civil Procedure as follows:

These responses are made solely for the purposes of this action, and are made without waiving, or intending to waive, the right at any time to revise, correct, modify, supplement or clarify any response provided herein or the right to object on any proper grounds to the use of these responses, for any purpose in whole or in part, in any subsequent proceedings or any other action. The right to raise any applicable objections at any time is expressly reserved. A response to any interrogatory herein should not be taken as an admission or acceptance of the existence of any facts set forth or assumed by such interrogatory, or that such response constitutes admissible

INTERROGATORY NO. 15

If You contend that HTC Corp. has previously willfully infringed or currently willfully infringes any of the Asserted Claims, identify the behavior You allege is egregious and culpable and provide the basis for Your contention. .

RESPONSE TO INTERROGATORY NO. 15

AGIS hereby incorporates the General Objections as if fully set forth herein. AGIS further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case because the burden or expense of the proposed discovery outweighs its likely benefit. AGIS further 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 further objects to this interrogatory on the ground it seeks information publicly available. AGIS further objects to this interrogatory on the ground it seeks information not within the custody, possession, or control of AGIS.

AGIS objects to this interrogatory because AGIS's answer depends on information requested from HTC by AGIS and is subject to HTC's supplemental responses to AGIS's pending interrogatories to HTC.

AGIS objects to this interrogatory as vague, overbroad, ambiguous and confusing. AGIS objects to the term "basis" as vague, overbroad, ambiguous, overbroad, undefined, and uncertain.

Notwithstanding its general and specific objections, AGIS answers as follows:

Discovery in this case is still ongoing and AGIS continues to investigate this matter. AGIS directs HTC to documents within its own possession.

Dated: August 17, 2018

As to Objections,

BROWN RUDNICK LLP

/s/ Vincent J. Rubino III

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**ATTORNEYS FOR PLAINTIFF, AGIS
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