

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

AGIS SOFTWARE DEVELOPMENT, LLC	§	CASE NO. 2:17-cv-514-JRG
	§	(Lead Case)
Plaintiff,	§	
	§	
v.	§	JURY TRIAL DEMANDED
	§	
HTC CORPORATION, et al.	§	
	§	
Defendant.	§	

AGIS SOFTWARE DEVELOPMENT, LLC	§	CASE NO. 2:17-CV-515-JRG
	§	(Member Case)
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
LG ELECTRONICS INC.	§	
	§	
Defendant.	§	
	§	

**DECLARATION OF JUSTIN CHI IN SUPPORT OF LG ELECTRONICS INC.’S
DAUBERT MOTION TO EXCLUDE THE OPINIONS OF MR. JOSEPH
MCALEXANDER**

I, Justin Chi, state and declare as follows:


1. I am an attorney with Arnold & Porter Kaye Scholer LLP (“APKS”), counsel of record for Defendant LG Electronics Inc. (“LGEKR”). I am a member of the Bar of the State of Texas and have been admitted to practice in the United States District Court for the Eastern District of Texas. I provide this declaration in support of Defendant LGEKR’s *Daubert* motion to exclude the opinions of Mr. Joseph C. McAlexander relating to infringement. I have personal knowledge of the matters stated in this declaration and would testify competently and truthfully to them if called upon to do so.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts of the Expert Report of Joseph C. McAlexander III Regarding Infringement of U.S. Patent Numbers: 8,213,970; 9,408,055; 9,445,251; and 9,467,838, dated December 14, 2018.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts of Attachment A to Mr. McAlexander's December 14, 2018 report regarding Findings of LG Product Infringement of 8,213,970 Patent Claims.

4. Attached as Exhibit C is a true and correct copy of the Commercial Invoice & Packing List produced as LG_00296721.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 25th day of January 2019 in Los Angeles, California.


Justin Chi