EXHIBIT I

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

AGIS SOFTWARE DEVELOPMENT, LLC
 	
    Plaintiff,
 	
v.
 	
HUAWEI DEVICE USA INC., ET AL.,
 	
    Defendants.
	Case No. 2:17-CV-0513-JRG
	(LEAD CASE)
	
	JURY TRIAL DEMANDED

AGIS SOFTWARE DEVELOPMENT, LLC
 	
    Plaintiff,
 	
v.
 	
LG ELECTRONICS INC.,
 	
    Defendant.
	Case No. 2:17-CV-0515-JRG
	(CONSOLIDATED CASE)
	
	JURY TRIAL DEMANDED

LG ELECTRONICS INC.'S FIRST SET OF INTERROGATORIES
TO PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC (NOS. 1- 13)

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil

Procedure, Defendant LG Electronics Inc. ("LGEKR" or "Defendant") hereby requests that

Plaintiff AGIS Software Development LLC ("AGIS" or "Plaintiff") respond to the following

Interrogatories in writing, under oath, and in accordance with the following definitions and

instructions, within thirty (30) days of the date of service thereof. These Interrogatories are

continuing in nature and require supplementation in accordance with the Federal Rules of Civil

Procedure.

DEFINITIONS

1.   "LGEKR" and "Defendant" shall mean Defendant LG Electronics Inc.

2.   "AGIS," "Plaintiff," "You," and "Your" shall mean Plaintiff AGIS Software

Development LLC, including but not limited to its past or present officers, directors, trustees,

employees, counsel, agents, consultants, representatives, and any other persons acting or

purporting to act on behalf of any of the foregoing, and AGIS's predecessors-in-interest,

successors-in-interest, parents, subsidiaries, and entities acting in joint venture, licensing, or

partnership relationships.

3.   "This Action" means *AGIS Software Development LLC v. LG Electronics Inc.*,

2:17-cv-00515-JRG (E.D. Tex.).

4.   "'970 Patent" means U.S. Patent No. 8,213,970, entitled "Method of Utilizing

Forced Alerts for Interactive Remote Communications."

5.   "'055 Patent" means U.S. Patent No. 9,408,055, entitled "Method to Provide Ad

Hoc and Password Protected Digital and Voice Networks."

6.   "'251 Patent" means U.S. Patent No. 9,445,251, entitled "Method to Provide Ad

Hoc and Password Protected Digital and Voice Networks."

7.   "'838 Patent" means U.S. Patent No. 9,467,838, entitled "Method to Provide Ad

Hoc and Password Protected Digital and Voice Networks."

8.   "Patents-in-Suit" means the '970 Patent, the '055 Patent, the '251 Patent, and the

'838 Patent.

9.   "Related Patents and Patent Applications" means any issued patent or patent

application having a relation by continuation application, continuation-in-part application, and/or

divisional application, as defined by the Manual of Patent Examining Procedure (Ninth Edition,

Revision 07.2015) §§ 201.06–08, with respect to the Patents-in-Suit. "Related Patent

Application" includes any international application and/or foreign counterpart of the Patents-in-

Suit. "Related Patent Application" also includes any patent application or issued patent within a chain of copendency with respect to any of the Patents-in-Suit.

10.   "Document(s)" shall have the broadest meaning ascribed to it by Federal Rule of Civil Procedure 34 and Federal Rule of Evidence 1001, and shall include within its meaning any and all papers, videotapes or video recordings, photographs, films, recordings, memoranda, books, records, accounts, letters, telegrams, correspondence, notes of meetings, notes of conversations, notes of telephone calls, inter-office memoranda or written communications of any nature, recordings of conversations either in writing or by means of any mechanical or electrical recording device, notes, papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings, time sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs and any differing versions of the foregoing whether denominated formal, informal or otherwise, as well as copies of the foregoing which differ in any way, including handwritten notations or other written or printed matter of any nature, from the original. The foregoing specifically includes the information stored in any form, including electronic form, on a computer or in a computer database or otherwise, including electronic mail. Moreover, the term "document" shall also include all "technical documents," such as source code, specifications, schematics, flow charts, artwork, drawing, pictures, pictorial representations, formulas, troubleshooting guides, service bulletins, technical bulletins, production specification sheets, white papers, operator manuals, operation manuals and instruction manuals.

11.   "Communication(s)" shall mean, including its usual and customary meaning, any transmission, conveyance or exchange of a word, statement, fact, thing, idea, document,

instruction, information, demand or question by any medium, whether by written, oral or other means, including, but not limited to, electronic communications and electronic mail.

12.   "Thing(s)" refers to any physical specimen or tangible item, including research and development models, samples, prototypes and the like.

13.   "Person(s)" refers to all natural persons and all types and kinds of business or other entities, including, but not limited to, corporations, limited liability companies, partnerships, joint ventures, associations, sole proprietorships, government bodies and government agencies. Any reference to an individual person, either singularly or as part of a defined group, includes that person's employees, agents, legal and non-legal representatives, heirs, successors, assigns and any other person or entity within that person's control. Any reference to a corporation or any other entity also refers to and includes any and all agents, employees, representatives, accountants, investment bankers, consultants or attorneys acting on behalf of the corporation or other entity.

14.   "Prior Art" shall mean the subject matter described in 35 U.S.C. §§ 102 and 103, including but not limited to publications, patents, physical devices, prototypes, uses, sales, and offers for sale, and any documents or other items evidencing any of the foregoing.

15.   "Identify" shall mean to state the following: (1) when referring to a person, the person's full name, present or last known address, the last known title and place of employment, the person's business title during the time period to which the interrogatory relates, and the relationship if any between such person and Plaintiff and dates during which such relationship existed; (2) when referring to a business, legal, or governmental entity or association, the name of the entity or association, and the address of its main office; (3) when referring to a fact, the fact and the identity of the documentary or testimonial support for that fact; (4) when referring to

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