

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 MOTION FOR SUMMARY JUDGMENT**

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 motion for summary judgment. 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 the June 15, 2017 patent assignment of U.S. Patent Nos. 9,408,055 (the “’055 Patent”), 9,445,251 (the “’251

Patent”), and 9,467,838 (the “838 Patent”) (collectively, the “location sharing patents”) from Advanced Ground Information Systems, Inc. (“AGIS, Inc.”) to AGIS Holdings, Inc., produced in this litigation as AGISTX_00006025-31.

3. Attached hereto as Exhibit B is a true and correct copy of [REDACTED]

[REDACTED]
[REDACTED] was produced in this litigation as AGISTX_00118219-28.

4. Attached hereto as Exhibit C is a true and correct copy of the June 15, 2017 patent assignment of the location sharing patents from AGIS Holdings, Inc. to AGIS Software Development LLC (“AGIS”), produced in this litigation as AGISTX_00006032-38.

5. Attached hereto as Exhibit D is a true and correct copy of [REDACTED]

[REDACTED]
[REDACTED] was produced in this litigation as AGISTX_00118229-38.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts of AGIS’s Supplemental Objections and Responses to LGEKR’s First Set of Interrogatories to Plaintiff (Nos. 1–13), served on December 6, 2018.

7. Attached hereto as Exhibit F is a true and correct copy of AGIS’s Second Supplemental Objections and Responses to LGEKR’s Second Set of Interrogatories to Plaintiff (No. 14), served on December 7, 2018.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts of the transcript of the deposition of Eric Armstrong, which took place on October 11, 2018.

9. Attached hereto as Exhibit H is a true and correct copy of excerpts of LGEKR's Supplemental Objections and Responses to AGIS's First Set of Interrogatories (Nos. 1-10), served on December 27, 2018.

10. Attached hereto as Exhibit I is a true and correct copy of LGEKR's First Set of Interrogatories to Plaintiff AGIS Software Development LLC (Nos. 1-13), served on June 13, 2018.

11. Attached hereto as Exhibit J is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Malcolm K. Beyer, which took place on October 22 and 23, 2018.

12. Attached hereto as Exhibit K is a true and correct copy of excerpts of the Android LifeRing Pocket Guide Revision 14, December 2016, produced in this litigation as AGISTX_00120881-37.

13. Attached hereto as Exhibit L is a true and correct copy of excerpts of the Android Full Manual Revision 19B, July 2017, produced in this litigation as AGISTX_00121049-89.

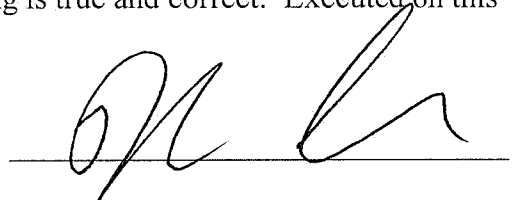
14. Attached hereto as Exhibit M is a true and correct copy of a printout of <https://www.agisinc.com/about/patents/>, accessed on January 24, 2019.

15. Attached hereto as Exhibit N is a true and correct copy of AGIS's Initial Disclosures, served on December 22, 2017.

16. Attached hereto as Exhibit O is a true and correct copy of excerpts of the source code for the LifeRing product produced in this litigation as AGISTXSRC_LG00000994-995 and AGISTXSRC_LG00001001-1004.

17. Attached hereto as Exhibit P is the affidavit of Christopher Butler of the Internet Archive, executed on January 25, 2019.

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.

A handwritten signature in black ink, appearing to read 'Justin Chi', is written over a horizontal line. The signature is stylized and cursive.

Justin Chi