EXHIBIT F

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

AGIS SOFTWARE DEVELOPMENT LLC, Plaintiff, v. HTC CORPORATION, Defendants.	§ § § § § § § § § § § §	Case No. 2:17-CV-0514-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**

**PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC'S SECOND SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO DEFENDANT LG ELECTRONICS INC.'S
SECOND SET OF INTERROGATORIES TO PLAINTIFF (NO. 14)**

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 responses to Defendant LG Electronics Inc.'s ("LG" or "Defendant") Second Set

of Interrogatories to Plaintiff (No. 14) 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 evidence. The responses herein reflect only the present state of AGIS's investigation and the present state of discovery. Except as otherwise indicated, an objection and/or response to a specific interrogatory does not imply that facts responsive to the interrogatory exist.

GENERAL OBJECTIONS

AGIS incorporates by reference the general and specific objections in *AGIS's Objections and Responses to Defendant LG Electronics, Inc.'s First Set of Interrogatories to Plaintiff (Nos. 1-13)*, dated July 13, 2018, *AGIS Objections and Responses to Defendant LG Electronics, Inc.'s Second Set of Interrogatories (No. 14)*, dated November 8, 2018, and *AGIS Objections and Responses to LG Electronics, Inc.'s Third Set of Interrogatories (No. 15)*, dated November 30, 2018.

**SPECIFIC OBJECTIONS AND RESPONSES TO DEFENDANT'S
SECOND SET OF INTERROGATORIES TO PLAINTIFF (NO. 14)**

INTERROGATORY NO. 14

Identify, on a claim-by-claim basis, each AGIS product that AGIS contends practices any Asserted Claim of any Patent-in-Suit.

RESPONSE TO INTERROGATORY NO. 14:

AGIS hereby incorporates the General Objections as if fully set forth herein.

AGIS objects to this interrogatory as vague and ambiguous with respect to the phrase "AGIS product."

AGIS objects to this interrogatory as overbroad and seeking irrelevant information to the extent the phrase "AGIS product[s]" purports to seek information regarding products developed by entities other than AGIS Software Development LLC.

AGIS objects to this Interrogatory as seeking information that is properly the subject of expert reports before the deadline for such disclosures.

AGIS objects to this Interrogatory to the extent it calls for a legal conclusion.

AGIS objects to this Interrogatory to the extent it seeks material protected by or may only be answered by reliance upon any privileged or work-product information.

Subject to and without waiver of the foregoing general and specific objections, AGIS responds as follows: Discovery and AGIS's investigation in this case remain ongoing, and subject to the parties' meet-and-confer and LG's narrowing of the scope of this interrogatory, AGIS will supplement this response to provide any additional responsive, non-privileged information to the extent such information exists and can be ascertained after a reasonable investigation in accordance with the Federal Rules of Civil Procedure and any applicable order of the Court. AGIS will supplement its response to this Interrogatory, if necessary, once the

Court and/or the parties clarify the scope of the claims by virtue of the claim construction process. AGIS reserves the right to supplement the response to this interrogatory including to identify documents pursuant Fed. R. Civ. P. 33(d).

In accordance with AGIS's identifications in its Complaint, AGIS Software Development LLC identifies the LifeRing and ASSIST software products, both of which are made and sold by AGIS Software Development LLC's sister company AGIS, Inc., as products that practice the claimed inventions of the asserted claims. AGIS, Inc. is a licensee of the Patents-in-Suit.

On August 14, 2018, counsel for AGIS Software Development LLC informed LG's counsel that a production of source code of AGIS, Inc.'s source code repository was available for inspection on a secure computer at Brown Rudnick LLP, 7 Times Square, New York, NY 10036 beginning of August 17, 2018. On September 6, 2018 and September 7, 2018, LG's counsel, Matthew Horton, inspected the production of source code.

AGIS identifies, pursuant to Fed. R. Civ. P. 33(d), the entire source code production made available on August 17, 2018 and reviewed by LG's counsel on September 6, 2018 and September 7, 2018 as information responsive to this interrogatory. The production of source code contains code which was checked in to AGIS, Inc.'s source code repository for LifeRing as of at least October 1, 2004 and meets the limitations of at least claim 28 of the '055 Patent, at least claim 24 of the '251 Patent, and at least claim 54 of the '838 Patent, when installed on the claimed apparatuses and/or systems. The first production of source code also contains code for LifeRing 5.0 which meets the limitations of at least claim 28 of the '055 Patent, at least claim 24 of the '251 Patent, at least claim 54 of the '838 Patent, and at least claim 1 of the '970 Patent.

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