

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

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

HTC CORPORATION, LG ELECTRONICS  
INC.

Defendants.

CIVIL ACTION NO. 2:17-cv-514-JRG  
(Lead Case)

CIVIL ACTION NO. 2:17-cv-515-JRG  
(Consolidated Case)

**JURY TRIAL DEMANDED**

**DECLARATION OF JUSEONG RYU IN SUPPORT OF  
LG ELECTRONICS, INC.'S MOTION FOR SUMMARY JUDGMENT**

I, Juseong Ryu, state and declare as follows:

1. I am a Senior Manager for LG Electronics Inc. ("LGEKR"). I work out of LGEKR's IP Center in Seoul, South Korea. As a Senior Manager at LGEKR, my job responsibilities include patent licensing and patent litigation support. I submit this declaration based upon my best and current knowledge regarding the subject matters addressed in this declaration. If called as a witness, I could and would testify competently to the information contained herein.

2. I understand that the plaintiff in the above-referenced action has asserted claims of patent infringement against certain LG-branded mobile devices that utilize the Android operating system ("OS") developed by Google LLC ("Google") (the "Accused Devices"). I also understand that the plaintiff's infringement claims are based on the pre-installation by LGEKR of certain Google Mobile Services ("GMS") applications on the Accused Devices, including Google Mobile Maps (the "Accused Applications").

3. LGEKR is a South Korean corporation headquartered in Seoul, South Korea. LGEKR designs, engineers, tests, and manufactures the mobile devices the Accused Devices outside the United States, mostly in Korea. LGEKR obtains the Android OS and Accused Applications from Google, and installs them on the Accused Devices outside the United States in Korea. LGEKR does not perform any activities with respect to the Accused Devices within the United States, including, without limitation, manufacturing, marketing, testing, using, distributing, selling or offering for sale of the Accused Devices within the United States.

4. LG Electronics MobileComm U.S.A. Inc. (“LGEMU”) was a wholly owned subsidiary of LG Electronics USA, Inc. (“LGEUS”), which is a wholly-owned subsidiary of LGEKR. As of August 1, 2018, LGEMU was merged into LGEUS. LGEMU was a California corporation with offices in California. LGEUS is a Delaware corporation headquartered in Englewood Cliffs, New Jersey.

5. LGEUS is solely responsible for importing, offering for sale, and selling the Accused Devices in the United States. Prior to its merger with LGEUS, LGEMU was solely responsible for importing, offering for sale, and selling the Accused Devices in the United States.

6. LGEUS (and before August 1, 2018, LGEMU) acquires the Accused Devices from LGEKR outside the United States and imports them into the United States for sale to national phone carriers, retailers, and distributors, who in turn sell those devices to end users throughout the United States. LGEUS (and before August 1, 2018, LGEMU) is the only entity authorized by LGEKR to import, offer to sell, or sell, LG branded mobile devices in the United States.

7. LGEKR does not sell or offer to sell any mobile devices, including the Accused Devices, in the United States. Sales of the Accused Devices in the United States are handled

exclusively by LGEUS, including all associated marketing and distribution activities in the United States.

8. LGEUS (and, before August 1, 2018, LGEMU) purchases the Accused Devices from LGEKR outside the United States. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] LGEKR does not have any ownership of or title to the Accused Devices at any point within the United States.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Seoul, South Korea on January 25, 2019

Juseong Ryu

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Juseong Ryu