

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

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

HTC CORPORATION,

Defendant.

Case No. 2:17-cv-00514-JRG  
(Lead Case)

**JURY TRIAL DEMANDED**

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

LG ELECTRONICS INC.,

Defendant.

Case No. 2:17-cv-00515-JRG  
(Member Case)

**JURY TRIAL DEMANDED**

**DECLARATION OF YASSER NAFEI IN SUPPORT OF  
LG ELECTRONICS INC.'S MOTION FOR SUMMARY JUDGMENT**

I, Yasser Nafei, state and declare as follows:

1. I am the Senior Vice President, Go-to-Market Strategy, Sales, and Product Management for LG Electronics U.S.A, Inc. ("LGEUS"). I provide this declaration in support of LG Electronics Inc.'s ("LGEKR") motion for summary judgment, and, in particular, related to the process by which LG mobile devices in the United States obtain Android OS software updates and pre-installed Google Mobile Service ("GMS") application software updates. If called as a witness, I could and would testify competently to the information contained herein.

2. My current position as the Senior Vice President, Go-to-Market Strategy, Sales, and Product Management is to assess and drive the successful launch and product marketing of LG mobile devices in the United States for different carriers, such as Verizon Wireless, AT&T, Sprint, T-Mobile, U.S. Cellular, and retailers, such as Best Buy and Walmart. In conjunction and coordination with other LG account team leaders, my team and I interface with these U.S. carriers and retailers to determine and ensure proper product portfolios are selected for the U.S. market and that appropriate Go-To-Market (GTM) activities including strategy, pricing, promotion schemes, and term sheets for those products are developed and executed during their life cycles. In my capacity as a Senior Vice President I have become aware of how LG mobile devices sold by LEGUS in the United States will receive Google-related software updates, as that is a part of the overall GTM activities including the communication of new product features and enhanced user experience, the planning of joint PR activities with carriers, the updates to LG marketing collaterals or social and digital media, all of these correspond to the many pieces of information relevant to the fulfillment and evaluation of my job responsibilities.

3. Google LLC ("Google") develops and provides Android OS software updates as well as updates to its GMS applications. I understand that Google is not a party in this action.

4. [REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]


7. [REDACTED]

[REDACTED]

[REDACTED]

8. I understand that there is a late-2018 article mentioning a new LG “Software Upgrade Center” in Magok-dong, Seoul, South Korea. (See, e.g., <http://www.lgnewsroom.com/2018/04/lg-opens-global-software-upgrade-center-for-faster-smartphone-updates/>.)

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

  
Yasser Nafei