

# EXHIBIT 14



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**VIA EMAIL: AMESSING@BROWNRUDNICK.COM**

Alessandra Messing  
Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036

**Re: *AGIS Software Development, LLC v. HTC Corporation*  
Case No. 2:17-cv-514 (E.D. Tex.)**

Dear Ms. Messing:

I write in response to your letter dated May 9, 2018.

As an initial matter, your letter references a January 16 letter that HTC Corp. never received. In fact, HTC Corp.'s answer date was January 22, 2018, several days after this referenced correspondence.

A week after your March 8 letter, HTC Corp. provided to AGIS over 20,000 pages of responsive and relevant documents on March 15. About two months later, your May 9 letter includes only a generic complaint.<sup>1</sup> AGIS's complaint is unhelpful to HTC Corp. From your letter, HTC Corp. cannot identify what, if anything, you allege is missing. Can you please specify, more particularly, what you believe is missing so HTC Corp. can address it?

In addition, your May 9 letter complains about the number of Google-related documents in HTC Corp.'s production. But, as you well know, AGIS has accused Google's applications (such as Hangouts, Maps, Device Manager, to name a few). HTC Corp. simply installs some Google applications. HTC Corp. does not receive source code to nor does it modify the source code of Google's applications. Naturally, many relevant documents would be Google related.

With respect to source code, even though no HTC Corp. made application is accused or implicated, HTC Corp. will lay make its source code for its phones available for inspection at Perkins Coie's San Diego office. For the initial inspection, please provide us with a week notice so that we may set up the source code computer.

Your generic complaints regarding HTC Corp.'s interrogatory responses also makes it impossible for HTC Corp. to understand exactly what issues you have with the responses. Each

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<sup>1</sup> You stated that HTC Corp. failed to produce "Source code, specifications, schematics, flow charts, artwork, formulas, or other documentation sufficient to show the operation of any aspects or elements of an Accused Instrumentality identified by the patent claimant in its P. R. 3-1(c) chart."

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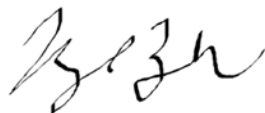
of AGIS's interrogatories is compound, confusing, and asks for information well-beyond the scope of this case. Interrogatory 5, for example, asks for "manufacture" and "assembly." Interrogatory 4 asks for hardware components that HTC Corp. purchases. How HTC Corp. physically manufactures and assembles phones, or the physical components it purchases, is not relevant to AGIS's software patents that accuse Google's applications of infringing. Please provide your basis for requesting hardware-related discovery.

Your letter also states that HTC Corp.'s answer to Rog 5 pointed AGIS to Google, but Google makes the accused applications. What exactly do you seek with this interrogatory, if not individuals involved with developing the accused software applications? Please clarify.

Furthermore, most of AGIS's other interrogatories ask for information from third parties. For instance, Interrogatories 1-2 ask for information relating to devices "sold to customers and made available for purchase by customers in the United States." The other Interrogatories request the same or similar information. As repeatedly stated to AGIS, HTC Corp. does not conduct these activities in the United States; another party not named to this lawsuit does. Please provide your basis for requesting that HTC Corp. provide this information on behalf of third-party entities.

With respect to HTC Corp.'s response to Rog 7, HTC Corp. shall investigate whether any relevant licenses exist. If they exist, HTC Corp. will supplement its response and production with that information. With respect to HTC Corp.'s response to Rog 8, HTC Corp. provided a detailed response noting that it will supplement or amend its response. Discovery is on-going, and HTC Corp. will continue to supplement this interrogatory with more detail as this case progresses. HTC Corp. will supplement its answer to Rog. 8 on or before June 8.

Finally, AGIS's generic May 9 correspondence, demanding a 2-day response, was sent nearly two months after HTC Corp.'s production, and about a month after HTC Corp.'s Interrogatory responses. Should AGIS have specific issues regarding HTC Corp.'s discovery, these issues should be addressed by AGIS in a timely and specific manner. AGIS cannot realistically expect HTC Corp. to substantively address any issue within two days, especially given AGIS's delay and that the complaints are non-specific.



Miguel J. Bombach

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