

# EXHIBIT 19

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

**AGIS SOFTWARE DEVELOPMENT, LLC,**

**Plaintiff,**

**v.**

**HUAWEI DEVICE USA INC., HUAWEI  
DEVICE CO., LTD. AND HUAWEI  
DEVICE (DONGGUAN) CO., LTD.,**

**Defendants.**

**CASE NO. 2:17-CV-0513-JRG  
LEAD CASE**

**JURY TRIAL DEMANDED**

**AGIS SOFTWARE DEVELOPMENT, LLC,**

**Plaintiff,**

**v.**

**HTC CORPORATION,**

**Defendant.**

**CASE NO. 2:17-CV-0514-JRG**

**JURY TRIAL DEMANDED**

**DEFENDANT HTC CORPORATION'S FIRST SET OF INTERROGATORIES TO  
PLAINTIFF AGIS SOFTWARE DEVELOPMENT, LLC (NOS. 1-15)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant HTC Corporation, ("HTC") through its counsel, hereby requests that Plaintiff AGIS Software Development, LLC ("AGIS") fully answer the following interrogatories within thirty (30) days in writing, under oath, and in conformity with the Definitions and Instructions set forth below, and afterwards supplement such interrogatory answers as may become necessary to comply with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

**DEFINITIONS**

The following definitions shall apply throughout these interrogatories, regardless of whether upper or lower-case letters are used:

custody, or control of the trial exhibit, deposition transcript, or trial transcript;

(f) if the trial exhibit, deposition transcript, or trial transcript is not in the possession, custody, or control of AGIS, AGIS FL, AGIS Holdings, what party has possession, custody, or control of that trial exhibit, deposition transcript, or trial transcript;

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(h) whether the trial exhibit, deposition transcript, or trial transcript is under an obligation of confidentiality between any of AGIS, AGIS FL, AGIS Holdings and any third party, including the identification of the third party.

**INTERROGATORY NO. 12:**

For each LifeRing Instrumentality sold or licensed by AGIS FL, on a version by version basis, identify: (a) the date of its first disclosure to a third party and whether said disclosure was under a non-disclosure agreement; (b) the date of its first disclosure to the public; (c) the date of its first sale or the issuance of the first software license; (d) number of sales or software licenses issued on a year by year basis; (e) revenue on a year by year basis; (f) costs on a year by year basis; (g) profit on a year by year basis; (h) usage statistics on a year by year basis; and (i) all persons most knowledgeable about each identified instrumentality.

**INTERROGATORY NO. 13:**

“joining a communication network corresponding to a group, wherein joining the communication network comprises transmitting a message including an identifier corresponding to the group”

If You contend that any Instrumentality made by HTC Corp. practices the above quoted claim limitation of claims 1 and 54 of the '838 patent, either directly or indirectly, explain the

basis for Your contention including a specific element-by-element identification of the specific functionality of the HTC Corp. Instrumentality that corresponds to the following elements:

- (a) communication network;
- (b) group;
- (c) message; and
- (d) identifier.

**INTERROGATORY NO. 14:**

“wherein the first device does not have access to respective Internet Protocol addresses of the second devices”

If You contend that any Instrumentality made by HTC Corp. practices the above quoted claim limitation of claims 1 and 24 of the '251 patent, either directly or indirectly, provide the basis for Your contention including a specific identification of the specific functionality of the HTC Corp. Instrumentality that You allege practices the phrase “does not have access.”

**INTERROGATORY NO. 15:**

If You contend that HTC Corp. has previously willfully infringed or currently willfully infringes any of the Asserted Claims, identify the behavior You allege is egregious and culpable and provide the basis for Your contention.

Dated: May 18, 2018

/s/ Miguel Bombach

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