EXHIBIT 20

**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-0514-JRG** (LEAD CASE) **JURY TRIAL DEMANDED**

**DEFENDANT HTC CORPORATION'S SECOND SET OF INTERROGATORIES TO
PLAINTIFF AGIS SOFTWARE DEVELOPMENT, LLC (NOS. 16-25)**

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:

1. "AGIS Software Development, LLC," "AGIS," "You," or "Your" refers to Plaintiff

AGIS Software Development, LLC, including without limitation all subsidiaries, parents,

affiliates, and all past or present directors, officers, attorneys, agents, representatives, employees,

and consultants.

Google owned and operated website accessible only via a web browser. Explain AGIS's basis, and identify all documents in support of AGIS's basis, for alleging that HTC Corporation directly infringes the '970 patent.

INTERROGATORY NO. 20:

HTC Corporation does not make, use, offer to sell, or sell smartphones in the United States or import smartphones into the United States. For each of the asserted claims of the '055, '251, '838, and '970 patents, separately identify the party or parties that AGIS contends directly infringe each patent, and which activity or activities from 35 U.S.C. § 271(a) (*i.e.*, "makes . . . within the United States", "uses . . . within the United States," "offers to sell . . . within the United States," "sells . . . within the United States," or "imports into the United States") constitute the infringing acts. Identify the documents that demonstrate these activities.

INTERROGATORY NO. 21:

Explain AGIS's basis, and identify all documents in support of AGIS's basis, for contending that HTC Corporation induces others to infringe each of the '055, '251, '838, and '970 patents under 35 U.S.C. § 271(b), including an identification of the party or parties that perform the alleged direct infringement and an identification of the activities conducted by HTC Corporation that you claim demonstrate a specific intent of HTC Corporation to encourage direct infringement, including HTC Corporation's knowledge of the '055, '251, '838, and '970 patents, knowledge that the induced acts constitute direct infringement of the '055, '251, '838, and '970 patents, and the affirmative steps taken by HTC Corporation to bring about direct infringement.

INTERROGATORY NO. 22:

Claims 1 and 54 of the '838 patent require the following claim limitations:

"participating in the group, wherein participating in the group includes sending first location information to a first server and receiving second location information from the first server"

and

"sending, to a second server, a request for second georeferenced map data different from the first georeferenced map data"

Identify: (a) whether AGIS alleges that an HTC Corporation-made phone or a server performs the "sending, to a second sever;" (b) what accused instrumentality AGIS contends is the claimed "first server;" and (c) what accused instrumentality AGIS contends is the claimed "second server."

INTERROGATORY NO. 23:

Explain AGIS's basis, and identify all documents in support of AGIS's basis, for stating that consumers attribute value to those features of Find My Device and Google Maps that allegedly infringe the '055, '251, '838, and '970 patents when the consumers purchase or determine to purchase an HTC Corporation-made phone and a quantifiable value attributable to said allegedly infringing features for each of the '055, '251, '838, and '970 patents.

INTERROGATORY NO. 24:

State the basis for AGIS's contention that it is entitled to an injunction, including without limitation (1) how AGIS has suffered irreparable injury as a result of HTC Corporation's alleged infringement, including an identification of the relevant market and the presence or absence of other competitors in the relevant market; (2) why monetary damages are inadequate to compensate for such injury; (3) the hardship AGIS would suffer were an injunction to be denied and why it is greater than the hardship HTC would suffer should an injunction be granted; and (4) how the public interest would be served by such an injunction. Identify all documents supporting AGIS's contention that it is entitled to an injunction.

INTERROGATORY NO. 25:

State the date on which AGIS contends that the hypothetical negotiation between AGIS

and HTC Corporation should take place and AGIS's basis for choosing said date.

Dated: November 7, 2018   Respectfully submitted,

                                                 /s/ Miguel Bombach
                                                 Matthew C. Bernstein, (Lead Attorney)
                                                 CA State Bar No. 199240
                                                 mbernstein@perkinscoie.com
                                                 Miguel J. Bombach
                                                 CA State Bar No. 274287
                                                 mbombach@perkinscoie.com
                                                 James Young Hurt *(Pro Hac Vice)*
                                                 CA State Bar No. 312390
                                                 jhurt@perkinscoie.com
                                                 PERKINS COIE LLP
                                                 11988 El Camino Real, Suite 350
                                                 San Diego, CA 92130-2594
                                                 Tel: (858) 720-5700
                                                 Fax: (858) 720-5799

                                                 Eric Findlay
                                                 State Bar No. 00789886
                                                 efindlay@findlaycraft.com
                                                 FINDLAY CRAFT, P.C.
                                                 102 N. College Ave., Suite 900
                                                 Tyler, TX 75702
                                                 Tel: (903) 534-1100
                                                 Fax: (903) 534-1137

                                                 ATTORNEYS FOR DEFENDANT
                                                 HTC CORPORATION

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.