EXHIBIT 21

RESTRICTED -- ATTORNEY'S EYES ONLY

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

	§	
AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No. 2:17-CV-0513-JRG
	§	(LEAD CASE)
Plaintiff,	§	
	§	
v.	§	**JURY TRIAL DEMANDED**
	§	
HUAWEI DEVICE USA INC., ET AL.,	§	
	§	
Defendants.	§	
	§	

**PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC'S SECOND SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO DEFENDANT HTC CORPORATION'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF (NOS. 1-15)**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil

Procedure, Plaintiff AGIS Software Development LLC ("AGIS" or "Plaintiff") hereby

supplements its response to Defendant HTC Corporation's ("HTC") First Set of Interrogatories

to Plaintiff (Nos. 1-15) in writing, under oath, and in accordance with the following definitions

and instructions. These Interrogatories are continuing in nature and require supplementation in

accordance with the Federal Rules of Civil Procedure as follows:

These responses are made solely for the purposes of this action, and are made without

waiving, or intending to waive, the right at any time to revise, correct, modify, supplement or

clarify any response provided herein or the right to object on any proper grounds to the use of

these responses, for any purpose in whole or in part, in any subsequent proceedings or any other

action. The right to raise any applicable objections at any time is expressly reserved. A response

to any interrogatory herein should not be taken as an admission or acceptance of the existence of

any facts set forth or assumed by such interrogatory, or that such response constitutes admissible

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;
I message; and
(d) identifier.

RESPONSE TO INTERROGATORY NO. 13

AGIS hereby incorporates the General Objections as if fully set forth herein. AGIS further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case because the burden or expense of the proposed discovery outweighs its likely benefit. AGIS further objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, attorney work product doctrine, and/or any other applicable privilege. AGIS further objects to this interrogatory on the ground it seeks information publicly available. AGIS further objects to this interrogatory on the ground it seeks information not within the custody, possession, or control of AGIS. AGIS further objects to this interrogatory as it seeks information that is the topic of expert discovery.

AGIS objects to this interrogatory because it seeks information already in HTC's possession and is duplicative of information provided in accordance with the Court's patent rules.

AGIS objects to this interrogatory because the interrogatory is an improper compound request. AGIS objects to this interrogatory because the interrogatory contains multiple distinct sub-parts (at least four), each of which counts towards HTC's total number of interrogatories.

Notwithstanding its general and specific objections, AGIS answers as follows: Discovery in this case is still ongoing and AGIS continues to investigate this matter. AGIS directs HTC to the factual and legal bases of HTC's infringement of the above-quoted claim limitation as shown in AGIS's P.R. 3-1 Disclosures, *i.e.*, infringement contentions, which were served on January 19, 2018.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13 (12/7/2018):

Subject to and without waiving its foregoing General and Specific Objections, AGIS responds as follows:

AGIS incorporates by reference as if fully set forth herein its Disclosure of Asserted Claims and Infringement Contentions and Amended Disclosure of Asserted Claims and Infringement Contentions, served on January 19, 2018 and May 25, 2018, respectively. AGIS further states that information responsive to this Interrogatory will be produced in AGIS's expert reports in accordance with this Court's scheduling order. AGIS will supplement its response to this Interrogatory, if necessary, once the Court and/or the parties clarify the scope of the claims by virtue of the claim construction process.

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."

RESPONSE TO INTERROGATORY NO. 14

AGIS hereby incorporates the General Objections as if fully set forth herein. AGIS further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case because the burden or expense of the proposed discovery outweighs its likely benefit. AGIS further objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, attorney work product doctrine, and/or any other applicable privilege. AGIS further objects to this interrogatory on the ground it seeks information publicly available. AGIS further objects to this interrogatory on the ground it seeks information not within the custody, possession, or control of AGIS. AGIS further objects to this interrogatory as it seeks information that is the topic of expert discovery.

AGIS objects to this interrogatory because it seeks information already in HTC's possession and is duplicative of information provided in accordance with the Court's patent rules.

AGIS objects to this interrogatory because the interrogatory is an improper compound request. AGIS objects to this interrogatory because the interrogatory contains multiple distinct sub-parts (at least four), each of which counts towards HTC's total number of interrogatories.

Notwithstanding its general and specific objections, AGIS answers as follows:

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