

EXHIBIT 22

**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

**DEFENDANT LG ELECTRONICS, INC.'S AMENDED INVALIDITY CONTENTIONS
PURSUANT TO PATENT LOCAL RULE 3-6**

claim in each patent-in-suit and, accordingly, none of the asserted claims is entitled to the benefit of the September 21, 2004, filing date for that additional reason.

Fourth, as reflected in and expressed by the Patent Trial and Appeals Board (“PTAB”) in *inter partes* review (IPR) petitions filed by Google LLC and Apple, Inc., the Patents-In-Suit are not entitled to the priority date claimed by AGIS. LGEKR incorporates by reference and intends to rely, in relevant part, on any analyses set forth by the PTAB in those petitions related to this issue, including as provided in any respective decisions related to those petitions.

1. '970 patent

None of the asserted claims of the '970 patent are entitled to a priority date of (or earlier than) September 21, 2004, as AGIS alleges, because at least the exemplary claim limitations listed below are not sufficiently disclosed in U.S. Application No. 10/711,490 (now U.S. Patent No. 7,031,728). Nor do any of the intervening parent applications (e.g., U.S. Application No. 11/612,830 and U.S. Application No. 11/308,648, now U.S. Patent No. 7,630,724) through which the '970 claims priority as a continuation-in-part sufficiently disclose at least one such limitation in each of the claims listed below. LGEKR also incorporates by reference any identifications and analyses that any expert witness(es) may take concerning priority issues. To the extent that AGIS is permitted to modify, and in fact modifies in any manner, the alleged date to which the '970 patent is entitled to priority, Defendant reserves the right to respond and challenge that date to the extent required by law to satisfy their burden.

Claim 1:

- “a forced message alert software application program including a list of required possible responses to be selected by a participant recipient of a forced message response loaded on each participating PDA/cell phone”
- “means for attaching a forced message alert software packet to a voice or text message creating a forced message alert that is transmitted by said sender PDA/cell phone to the