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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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

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AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

HUAWEI DEVICE USA INC.,
HUAWEI DEVICE CO., LTD. AND
HUAWEI DEVICE (DONGGUAN) CO., LTD.,
HTC CORPORATION,
LG ELECTRONICS INC.,
APPLE INC.,
ZTE CORPORATION,
ZTE (USA), INC., AND
ZTE (TX), INC.,

Defendants.

-----x

Civil Action No. 2:17-CV-513-JRG (Lead Case)
Civil Action No. 2:17-CV-514-JRG
Civil Action No. 2:17-CV-515-JRG
Civil Action No. 2:17-CV-516-JRG
Civil Action No. 2:17-CV-517-JRG

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*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

*** PURSUANT TO PROTECTIVE ORDER ***

VIDEO DEPOSITION OF

AGIS SOFTWARE DEVELOPMENT LLC'S

FED. RULE OF CIV. PROC. 30(b)(6) REPRESENTATIVE,

MALCOLM KELLER BEYER, Jr., VOLUME I

New York, New York

October 22, 2018

REPORTED BY:

BRANDON R. RAINOFF, RPR, RMR, CRR, FCRR

Ref: 23215

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MALCOM KELLER BEYER, Jr., VOLUME II

New York, New York

October 23, 2018

REPORTED BY:
BRANDON R. RAINOFF, RPR, RMR, CRR, FCRR
Ref: 23216

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1 Q. You sent one of our -- your principal
2 patents, correct?

3 A. Yes.

4 Q. Which patent is AGIS, Inc.'s principal
5 patent?

6 MR. RUBINO: Objection to form.

7 A. There are many, but I would say '724
8 is a principal patent. '728 is a principal
9 patent.

10 Q. And those are not the -- are those
11 patents asserted in this case?

12 MR. RUBINO: Objection to form.

13 A. I believe they are part of the patent
14 chain.

15 Q. How do you make a determination of
16 what patents are the principal patents?

17 MR. RUBINO: Objection to form.

18 A. Just what I thought at the time was
19 the principal patent.

20 Q. Has your determination of principal
21 patents changed over time?

22 MR. RUBINO: Objection to form.

23 A. It depends on which customer.

24 Q. It depends on which customer?

25 A. Customer, yes.