

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

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

vs.

HTC CORPORATION,

Defendant.

**CASE NO. 2:17-CV-514-JRG
(LEAD CASE)**

JURY TRIAL DEMANDED

**DECLARATION OF MIGUEL J. BOMBACH
IN SUPPORT OF DEFENDANT HTC CORPORATION'S
MOTIONS *IN LIMINE* NOS. 1-12**

I, Miguel J. Bombach, hereby declare as follows:

1. I am an attorney at the law firm of Perkins Coie LLP and counsel of record for HTC Corporation (“HTC Corp.”) in the above entitled matter. I am a member of good standing of the California and United States Patent and Trademark Bar and am admitted to practice in the Eastern District of Texas.

2. I make this declaration in support of HTC Corp.’s Motions *in Limine* Nos. 1-12.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of Attachment A to the expert report of Joseph C. McAlexander.

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of Attachment B to the expert report of Joseph C. McAlexander.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of Attachment C to the expert report of Joseph C. McAlexander.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of Attachment D to the expert report of Joseph C. McAlexander.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the deposition of Dr. Andrew Wolfe, taken on February 1, 2019.

8. Attached hereto as Exhibit 6 is a true and correct copy of an email from Enrique W. Iturralde (who represents AGIS) regarding AGIS receiving a production of source code from Google, dated January 24, 2019.

9. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiff’s Disclosure of Asserted Claims and Infringement Contentions, dated December 19, 2018.

10. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the Expert Report of Dr. Andrew Wolfe, dated January 11, 2019.

11. Attached hereto as Exhibit 9 is a true and correct copy of the Notice of Subpoenas to Google LLC by AGIS Software Development, LLC, dated August 29, 2018.

12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of a letter from Miguel Bombach to Alessandra Messing, dated May 16, 2018.

13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of an email from Enrique W. Iturralde to Miguel Bombach regarding source code review, dated October 2, 2018.

14. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of the Expert Report of Joseph C. McAlexander, dated December 14, 2018.

15. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the Expert Report of Alan Ratliff, dated December 14, 2018.

16. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the deposition of Alan Ratliff, dated January 24, 2019.

17. Attached hereto as Exhibit 15 is a true and correct copy of excerpts of the deposition of Malcolm Keller Beyer, Jr., taken on October 22 and October 23, 2018.

18. Attached hereto as Exhibit 16 is a true and correct copy of excerpts of Defendant's Notice of Deposition of AGIS Software Development LLC pursuant to Rule 30(B)(6), dated July 27, 2018.

19. Attached hereto as Exhibit 17 is a true and correct copy of excerpts of an email from Enrique W. Iturralde, dated September 21, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of February, 2019, in San Diego, California.

/s/ Miguel J. Bombach
Miguel J. Bombach