

EXHIBIT 16

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

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. §
 §

**Civil Action No. 2:17-CV-513-JRG
(Lead Case)**

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**DEFENDANTS’ NOTICE OF DEPOSITION OF
AGIS SOFTWARE DEVELOPMENT LLC PURSUANT TO RULE 30(B)(6)**

TO PLAINTIFF AND ITS COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Huawei Device USA Inc.; Huawei Device Co., Ltd.; Huawei Device (Dongguan) Co., Ltd.; LG Electronics, Inc.; HTC Corporation; Apple Inc.; ZTE (TX) Inc.; and ZTE (USA) Inc. (collectively, “Defendants”), by and through undersigned counsel, will take the deposition upon oral examination of Plaintiff AGIS Software Development LLC (“AGIS”) on the topics listed below.

The deposition will begin at 9:00 a.m. on September 10, 2018 at Phillips Point, East Tower, 777 S. Flagler Drive, Suite 1000, West Palm Beach, Florida 33401 or at a mutually-agreed time and place and will continue from day to day until completed or at such other date and time that are mutually agreeable to the parties. The deposition will take place before an officer duly authorized

in-Suit, including but not limited to those at issue in any other lawsuit, judicial proceeding, administrative proceeding, arbitration, or other adverse proceeding.

23. Any testing, analysis, consideration, or evaluation conducted by or prepared by or on behalf of AGIS, AGIS's counsel, or anyone else acting on AGIS's behalf to determine whether, or that may have revealed whether, any Accused Products infringe any of the Asserted Claims.

24. Any analysis related to any products considered by AGIS to embody one or more inventions of the Patents-in-Suit.

25. The Patents-in-Suit, including the subject matter and alleged invention(s) of the Patents-in-Suit.

26. The meaning of the terms in the asserted claims of the Patents-in-Suit.

27. The conception, reduction to practice, and diligence between conception and reduction to practice of any alleged invention of the Patents-in-Suit.

28. The inventorship of each asserted claim of the Patents-in-Suit, including but not limited to the contribution to each asserted claim by each Named Inventor.

29. AGIS's relationship with any inventors of the Patents-in-Suit.

30. All Prior Art (whether disputed or undisputed) to any of the Patents-in-Suit known to AGIS or AGIS Related Entities.

31. AGIS's knowledge of the Prior Art references identified in Defendants' Invalidity Contentions, as well as any additional amendments to those and/or other disclosures of Prior Art.

32. The scope, methodology (including identification of search terms), and results of any Prior Art searches or analyses concerning the Patents-in-Suit conducted by AGIS, AGIS's counsel, AGIS Related Entities, or anyone substantially involved with the prosecution of any of the Patents-in-Suit, whether before or after the issuance dates of the Patents-in-Suit.

33. The prosecution of the Patents-in-Suit and the decision to seek patent protection.
34. The prosecution of any Related Patents and Patent Applications before the United States Patent and Trademark Office.
35. The priority date of each of the Patents-in-Suit.
36. Any evidence that the '410 Application provides support for any of the claims of any of the Patents-in-Suit.
37. The expiration date of each of the Patents-in-Suit.
38. Any alleged novelty or alleged benefit of the Patents-in-Suit over the prior art.
39. Any facts or circumstances that AGIS contends demonstrates objective indicia of nonobviousness of the asserted claims of the Patents-in-Suit, including but not limited to commercial success (including any evidence that such success is attributable to the Patents-in-Suit and not unpatented attributes), long-felt need, failed attempts of others to solve a problem, initial skepticism, industry recognition and praise for the alleged invention(s), and copying by others.
40. For each alleged invention of each of the Patents-in-Suit, the facts and circumstances relating to the first: (a) manufacture; (ii) use; (iii) public use; (iv) offer for sale; (v) offer for sale in the United States; (vi) sale; (vii) sale in the United States; (viii) disclosure outside of AGIS; and (ix) written description.
41. The factual and legal bases for AGIS's allegations of infringement (whether direct or indirect) of each of the Patents-in-Suit by any Accused Product.
42. The date on which AGIS or any AGIS Related Entities became aware of any Accused Product and the date on which AGIS or any AGIS Related Entities became aware of any alleged infringement of each of the Patents-in-Suit.