

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

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

HTC CORPORATION, et al.

Defendant.

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

JURY TRIAL DEMANDED

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

LG ELECTRONICS INC.

Defendant.

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CASE NO. 2:17-CV-515-JRG
(CONSOLIDATED CASE)

JURY TRIAL DEMANDED

**DECLARATION OF JUSTIN CHI IN SUPPORT OF LG ELECTRONICS INC.'S
OPPOSITION TO AGIS SOFTWARE DEVELOPMENT LLC'S DAUBERT MOTION
TO EXCLUDE THE OPINIONS OF W. CHRISTOPHER BAKEWELL**

I, Justin Chi, state and declare as follows:


1. I am an attorney with Arnold & Porter Kaye Scholer LLP ("APKS"), counsel of record for Defendant LG Electronics Inc. ("LGEKR"). I am a member of the Bar of the State of Texas and have been admitted to practice in the United States District Court for the Eastern District of Texas. I provide this declaration in support of Defendant LGEKR's opposition to AGIS Software Development LLC's ("AGIS") *Daubert* motion to exclude the opinions of W. Christopher Bakewell relating to damages. I have personal knowledge of the matters stated in this declaration and would testify competently and truthfully to them if called upon to do so.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts of Mr. W. Christopher Bakewell's Rebuttal Expert Report Regarding Damages, dated January 11, 2019. As recommended in Local Rule CV-7(b), relevant, cited-to portions have been highlighted in this copy for the Court.

3. Attached hereto as Exhibit B is a true and correct copy of a workpaper submitted with the supplemental exhibits and workpapers in support of the expert report of AGIS's damages expert, Mr. Alan Ratliff, entitled "StoneTurn Workpaper 13." As recommended in Local Rule CV-7(b), relevant, cited-to portions have been highlighted in this copy for the Court.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts of the Damages Expert Report of Alan Ratliff on Behalf of AGIS With Respect To LG Electronics Inc. and a workpaper submitted with the exhibits and workpapers in support of Mr. Ratliff's expert report, entitled "StoneTurn Workpaper 12."

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 11th day of February 2019 in Houston, Texas.


Justin Chi