

# Exhibit B

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

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

HUAWEI DEVICE USA INC., HUAWEI  
DEVICE CO., LTD. AND HUAWEI DEVICE  
(DONGGUAN) CO., LTD.

Defendants.

LEAD CASE NO. 2:17-cv-513-JRG

**JURY TRIAL DEMANDED**

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AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

LG ELECTRONICS, INC.

Defendant.

MEMBER CASE NO. 2:17-cv-515-JRG

**JURY TRIAL DEMANDED**

**PLAINTIFF'S INITIAL DISCLOSURES TO LG ELECTRONICS, INC.**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and the Opposed Docket Control Order (Dkt. 61) filed by the parties in this matter, Plaintiff AGIS Software Development LLC ("AGIS"), hereby makes the following initial disclosures to Defendant LG Electronics, Inc. ("LG" or "Defendant"). AGIS makes these initial disclosures based on information obtained to date and available to AGIS and without the full benefit of any discovery or disclosures from LG or any potentially relevant third parties. Moreover, AGIS has not had the opportunity to fully investigate all possible claims as discovery for AGIS has only just begun,

and therefore, AGIS reserves the right to amend and/or supplement these disclosures, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, as additional information becomes available during the course of this lawsuit.

AGIS's initial disclosures are made without, in any way, waiving (i) the right to object to any discovery requests or to the admissibility of any evidence on the grounds of privilege, work product immunity, relevance, competency, materiality, hearsay, or any other proper ground in this action or in any other action; (ii) the right to object to the use of any such information, for any purpose, in whole or in part, in any proceeding in this action or in any other action; or (iii) the right to object to any and all grounds to any other discovery request or proceeding involving or relating to the subject matter of these disclosures in any proceeding in this action or in any other action.

AGIS submits, based on information reasonably available to it at this time, and subject to the limitations set forth above, the following initial disclosures:

**(a) The Correct Name of the Parties to the Lawsuit.**

AGIS believes that the correct entities have been named as the plaintiff and as the defendant in this lawsuit.

**(b) The Names, Address, and Telephone Number of Any Potential Parties.**

AGIS is continuing its investigation into this issue and reserves the right to supplement this response and identify additional parties to the lawsuit. AGIS is not presently aware of any potential parties.

**(c) Legal Theories and, in General, the Factual Bases of AGIS's Claims or Defenses.**

AGIS has identified its current legal theories in its Complaint (Member Case, Dkt. 1) and Plaintiff's Disclosure of Asserted Claims and Infringement Contentions ("PICS") served in accordance with P.R. 3-1, accompanied by claim charts, all of which AGIS hereby incorporates by reference. AGIS reserves the right to raise additional claims as discovery progresses and as the law in this area is developed further during the pendency of this litigation.

Plaintiff's PICS identify that the LG Accused Products, as defined therein, infringe at least each of claims 1-54 of U.S. Patent No. 9,467, 838 (the "838 patent"); claims 1-35 of U.S. Patent No. 9,445,251 (the "251 patent"); claims 1-54 of U.S. Patent No. 9,408,055 (the "055 patent"); and claims 1 and 3-9 of U.S. Patent No. 8,213,970 (the "970 patent") (collectively "Asserted Patents"). Plaintiff's PICS also identify the LG Accused Products including, but not limited to, the following phones and tablets (and any variants of the models listed below):

- V30 (H931, LS998U, H932, H932U, VS996, US998, AS998),
- X charge (US601, SP320, M327, M322),
- Q6 (US700),
- G6+ (US997U),
- G6 (US997, VS988, AS993, H871, H872, LS993),
- Fiesta 2 (L173BL, L164VL)
- V20 (LS997, H910, H918, US996, VS995)
- X venture (US701, H700), Stylo 3 (LS777)
- Stylo 3 Plus (MP450, TP450)
- Tribute HD (LS676)
- Rebel 2 (L57BL, L58BL, L58VL)
- Fiesta LTE (L63BL, L64VL)

- Stylo 3 LTE (L83BL, L84VL)
- K20 plus (MP260, TP260)
- Grace LTE (L59BL)
- K3 (AS110, US110, LS450)
- Stylo 3 (LS777, M430)
- Phoenix 3 (M150)
- Risio 2 (M154)
- K8 2017 (US215)
- Stylo 2 V (VS835)
- K20 (M255, RS501)
- K20 V (VS501)
- Aristo (M210)
- Harmony (M257)
- G5 (VS987, AS992, H820, H830, LS992, RS988, US992)
- Aristo Silver (MS210)
- Aristo Cobalt Blue (MS210UK)
- Stylo 2 Plus (MS550BK, K550)
- Fortune (M153)
- Tribute HD (LS676)
- X power (K212, K450, LS755, US610)
- K10 (MS428, K425, K428SG)
- Stylo 2 (LS775, K540)
- G Vista (VS880)

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