



**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

DEFENDANT LG ELECTRONICS INC.'S MOTIONS *IN LIMINE* NOS. 1-6

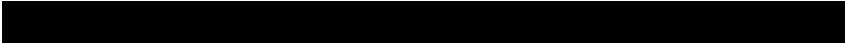


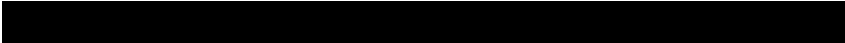
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[REDACTED]

Defendant LG Electronics Inc. (“LG Korea”) hereby moves *in limine* to preclude introduction by Plaintiff AGIS Software Development LLC (“AGIS”) of certain argument, evidence, and/or testimony at trial, as described below.

I. MIL NO. 1 TO EXCLUDE TESTIMONY AND EVIDENCE RELATED TO ACCUSED APPLICATIONS FOR WHICH AGIS HAS NOT PROFFERED EVIDENCE OR ADVANCED SUBSTANTIVE ALLEGATIONS OF INFRINGEMENT

LG Korea moves *in limine* to exclude testimony, evidence and argument related to Google software, and functionality therein, for which AGIS does not advance any substantive contentions, evidence, or analyses in this case. In pursuing its infringement claims against LG Korea related to the asserted patents¹, AGIS and [REDACTED]

[REDACTED]

[REDACTED]. Beyond this, there are passing assertions, without any substantive technical evidence or argument, that other Google applications and systems infringe. This includes Android OS, Google Plus, Google Hangouts, Google Assistant, Google Search, Google Messages, Android Messenger, Google Allo, Google Duo, Gmail, and/or Google Chrome. (*See, e.g.*, Ex. 1, AGIS infringement contentions - ‘970 chart - 12/19/18, at A-2; Ex. 2, AGIS infringement contentions - ‘055 chart - 11/28/17, at B-2; Ex. 3, AGIS infringement contentions - ‘251 chart - 11/28/17, at C-2; Ex. 4, AGIS infringement contentions - ‘838 chart - 11/28/17, at D-2; [REDACTED]

[REDACTED]

[REDACTED]

¹ The patents AGIS asserts against LG Korea are U.S. Patent Nos. 8,213,970 (“‘970 patent”), 9,408,055 (“‘055 patent”), 9,445,251 (“‘251 patent”), and 9,467,838 (“‘838 patent”) (collectively, “Patents-In-Suit”).

² Find My Device is the successor name to what was previously known as Android Device Manager. (D.I. 132-2, ¶ 1.)

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