

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

AGIS SOFTWARE DEVELOPMENT, LLC	§	CASE NO. 2:17-cv-514-JRG
	§	(Lead Case)
Plaintiff,	§	
	§	
v.	§	JURY TRIAL DEMANDED
	§	
HTC CORPORATION, et al.	§	
	§	
Defendant.	§	

AGIS SOFTWARE DEVELOPMENT, LLC	§	CASE NO. 2:17-CV-515-JRG
	§	(Member Case)
	§	
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
LG ELECTRONICS INC.	§	
	§	
Defendant.	§	

**DECLARATION OF NICHOLAS H. LEE IN SUPPORT OF DEFENDANT LG
ELECTRONICS INC.’S MOTIONS IN LIMINE NOS. 1-6**

I, Nicholas H. Lee, state and declare as follows:

1. I am a partner of Arnold & Porter Kaye Scholer LLP, counsel of record for Defendant LG Electronics Inc. (“LG Korea”). I am a member of the Bar of the State of California and have been admitted to practice in the United States District Court for the Eastern District of Texas (“EDTX”). I provide this declaration in support of Defendant LG Korea’s Motions *In Limine* Nos. 1–6. 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 1 is a true and correct copy of excerpts of Exhibit A to AGIS's Infringement Contentions regarding U.S. Patent No. 8,213,970, dated December 19, 2018.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of Exhibit B to AGIS's Infringement Contentions regarding U.S. Patent No. 9,408,055, dated November 28, 2017.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of Exhibit C to AGIS's Infringement Contentions regarding U.S. Patent No. 9,445,251, dated November 28, 2017.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of Exhibit D to AGIS's Infringement Contentions regarding U.S. Patent No. 9,467,838, dated November 28, 2017.

6. Attached hereto as Exhibit 5 is a true and correct copy of Attachment A to Mr. McAlexander's December 14, 2018 report regarding Findings of LG Product Infringement of 8,213,970 Patent Claims.

7. Attached hereto as Exhibit 6 is a true and correct copy of Attachment B to Mr. McAlexander's December 14, 2018 report regarding Findings of LG Product Infringement of 9,408,055 Patent Claims.

8. Attached hereto as Exhibit 7 is a true and correct copy of Attachment C to Mr. McAlexander's December 14, 2018 report regarding Findings of LG Product Infringement of 9,445,251 Patent Claims.

9. Attached hereto as Exhibit 8 is a true and correct copy of Attachment D to Mr. McAlexander's December 14, 2018 report regarding Findings of LG Product Infringement of 9,467,838 Patent Claims.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the Expert Report of Joseph C. McAlexander III Regarding Infringement of U.S. Patent Numbers: 8,213,970; 9,408,055; 9,445,251; and 9,467,838, dated December 14, 2018.

11. Attached hereto as Exhibit 10 is a true and correct copy of AGIS's Notice of Subpoena to Google LLC and Subpoena to Produce Documents, Information, Or Objects Or To Permit Inspection Of Premises In A Civil Action, served on August 29, 2018.

12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of Plaintiff AGIS Software Development LLC's Supplemental Objections and Responses to Defendant LG Electronics Inc.'s First Set of Interrogatories to Plaintiff (Nos. 1-13), served on December 6, 2018.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles, California on February 11, 2019.

/s/ Nicholas H. Lee
Nicholas H. Lee
Attorney for Defendant LG Electronics Inc.