

# Exhibit 4

**Exhibit D - Claim Chart for U.S. Patent No. 9,467,838 Against LG**

In these Infringement Contentions, AGIS Software Development LLC (“AGIS”) contends that at least the U.S. Patent No. 9,467,838 (the “’838 Patent”) identified below are infringed by the Accused Products (*e.g.*, phones) are manufactured, sold, offered for sale, and/or used by LG Electronics, Inc. (“LG”).

The Accused Products comprise LG products running the Android mobile operating system and manufactured during and after 2011. For example, the Accused Products comprise the following Android-based phones: V30 (H932, H932U, VS996, US998, AS998), X charge (US601, SP320, M327, M322), Q6 (US700), G6+ (US997U), AS993, H871, H872, LS993), Fiesta 2 (L173BL, L164VL), V20 (LS997, H910, H918, US996, VS995), X venture Stylo 3 (LS777), Stylo 3 Plus (MP450, TP450), Tribute HD (LS676), Rebel 2 (L57BL, L58BL, L58VL), Fiesta 1 (L64VL), Stylo 3 LTE (L83BL, L84VL), K20 plus (MP260, TP260), Grace LTE (L59BL), K3 (AS110, US110, LS777, M430), Phoenix 3 (M150), Risio 2 (M154), K8 2017 (US215), Stylo 2 V (VS835), K20 (M255, RS501), Aristo (M210), Harmony (M257), G5 (VS987, AS992, H820, H830, LS992, RS988, US992), Aristo Silver (MS210), Blue (MS210UK), Stylo 2 Plus (MS550BK, K550), Fortune (M153), Tribute HD (LS676), X power (K212, K450), K10 (MS428, K425, K428SG), Stylo 2 (LS775, K540), G Vista (VS880), Escape 3 (K373), Classic (L18VC), Rebel (L44VL), Treasure LTE (L51AL, L52VL), Premier LTE (L61AL, L62VL), Stylo 2 LTE (L82VL), K7 (MS330, AS330, RS500, US375), G4 (US991), K4 (VS425), Optimus Zone 3 (VS425PP), K8 V (VS500, VS500PP), Phoenix 2 (LS675), Spree (K120), G Vista 2 (H740), Escape 2 (H443), Risio (H343), Access LTE (L31L), Leon LTE (H343), (H631, MS631, H634, LS770), Volt 2 (LS751), Tribute 2 (LS665), Escape 2 (H445), Logos (US550), Transpyre (D850, LS990, D851, AS985, VS985, AS990, US990), Ultimate 2 (L41C), Tribute (LS660), G3 Vigor (D725), Legend Vista (D631), Volt (LS740), Optimus Fuel (L34C), Optimus L90 (D415), Optimus F3Q (D520), D820 (D820), C8 (D801, LS980), Optimus F6 (D500), Enact (VS890), Optimus F3 (VM720, LS720), Rumor Reflex S (LN272S), C8 (US780), Optimus F5 (AS870), Optimus G Pro (E980), Lucid2 (VS870), Spirit 3G (MS870), LGE960 (LGE960), (LW770), Mach (LS860), Optimus G (LS970, E970), Optimus L9 (P769), Venice (LG730), Escape (P870), Specter Splendor (US730), Intuition (VS950), Motion 4 (MS770), Optimus Plus (AS695), Elite (LS696), Viper (LS840), (MS695), Lucid (VS840), Nitro (P930), Spectrum (VS920), Marquee (LG855), Connect 4G (MS830), Optimus C (AS680), Ignite (AS855), myTouch Q (LGC800DG, LGC800VL), Optimus One (P504), myTouch (LGE739B), (C729), Optimus Slider (VM701), Esteem (MS910), Enlighten (VS700), Marquee (LS855), Thrill 4G (P925), Rebel Genesis (US760), G2x (P999), Thrive (P506), Phoenix (P505), Optimus C (LW690), Optimus V (WM670), Optimus M (MS690), Axis (LGAS740), Apex (US740), Vortex (VS660), Optimus S (LS670), Ally (VS740), and

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AGIS reserves the right to amend this list of accused phones as discovery progresses. For example, the Accused the following Android-based tablets: G Pad F2 8.0 (LK460), G Pad X II 8.0 Plus (V530), G Pad X II 10.1 (UK7 Gen (AK495, UK495), G Pad X 8.0 (V520, V521), G Pad II 10.1 Full HD (V940N), G Pad X 10.1 (V930), G Pa G Pad 8.0 (V480), G Pad 10.1 (V700), G Pad 7.0 (V400), G Pad F 8.0 1st Gen (AK495, V495, V496, UK495), C VK810), G Pad F 7.0 (LK430), G Pad 7.0 LTE (VK410, UK410, V410), G Pad 10.1 LTE (VK700), G Pad 8.3 C (V510), G Pad 8.3 Black (V500). AGIS reserves the right to amend this list of accused tablets as discovery prog the Accused Products comprise LG products, including but not limited to the phones and tablets as described her following versions (and all intervening updates and sub-versions) of the Android mobile operating system: Andr 4.3, 4.4, 5.0, 5.1, 6.0, 7.0, 7.1, 8.0, and 8.1. For example, the Accused Products comprise LG products, including phones and tablets as described herein, running any versions of the following Android-based applications and/or Device Manager, Find My Phone, Find My Device, Google Latitude, Google Plus, Google Hangouts, Google M Google Search, Google Messages, Android Messenger, Google Allo, Google Duo, Gmail, and Google Chrome. Accused Products comprise LG products, including but not limited to the phones and tablets described herein, pa networks and/or services related to the execution and/or use of the Android mobile operating system versions and applications and/or software described herein.

AGIS does not concede that any claims of the '838 Patent that are not listed below are not infringed by th Moreover, the citations to certain documents and other information below are intended to be exemplary only and AGIS from citing or relying on additional documents, information, source code, and/or testimony at a later time. are preliminary in nature, and an analysis of LG's products, internal documentation, source code, and/or testimon witnesses may more fully and accurately describe the infringing features of its accused products. Accordingly, A right to supplement, correct, modify, and/or amend these contentions once such additional information is made a Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as discove progresses; in view of the Court's claim construction order(s); in view of any positions taken by LG, including b positions on claim construction, invalidity, and/or non-infringement; and in connection with the preparation and reports.

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US9467838	Exemplary Supporting Evidence Regarding Accused Products
<p>1[P]. A computer-implemented method comprising:</p>	<p>LG infringes directly and/or indirectly by performing, inducing others to perform, and/or causing the performance of: a computer-implemented method [of claim 1].</p> <p>The Accused Products meet the claim limitations by providing device-location tracking features described below. For example, the Accused Products meet the claim limitations because they are pre-installed with Android mobile operating systems containing code for providing device location tracking features as provided in the claims limitations herein. For example, the Accused Products run applications and/or software that run within the Android mobile operating system and use the components of the Android mobile operating system to provide device-location tracking features. In addition to the components and features of the Android mobile operating system itself, the following applications and/or software run within the Android mobile operating system and use the components of the Android mobile operating system to provide device-location tracking features: Device Manager, Find My Phone, Find My Device, Google Latitude, Google Plus, Google Maps, Google Messages, Android Messenger, Google Allo, Google Duo, and Google Assistant.</p> <p>The Accused Products meet the claim limitations under at least two exemplary methods shown below, which may be useable together or separately.</p> <p><b>Find My Device:</b> Android Device Manager is the predecessor to Find My Device and has been, as a standard, pre-installed feature since 2013 and downloadable as a software application. In a more recent iteration, Find My Device, often called the “new and improved Android Device Manager,” is now part of the standard Google Play Protect suite which is pre-installed and enabled on all devices,” <i>i.e.</i>, the Accused Products running Android OS. Upon information, the Find My Device method also uses and/or works in conjunction with functionalities as provided in the claims limitations herein, such as Google Maps, Google Messages, Android Messenger, Location Access, Google Chrome, and Google Assistant, which come pre-installed on the Accused Products. For the purposes of avoiding needlessly cumulative and duplicative evidence, AGIS sets forth the Find My Device feature of the Accused Products as representative of this first exemplary method. AGIS reserves the right to supplement this evidence to the extent that defendant requires additional information in accordance with P.R. 37.1(c) for any reason for which it may deem necessary.</p> <p><i>See, e.g.</i>, <a href="https://www.androidcentral.com/find-my-device">https://www.androidcentral.com/find-my-device</a>;</p>