

EXHIBIT B

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

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

HTC CORPORATION,

Defendant.

Case No. 2:17-cv-00514-JRG
(Lead Case)

JURY TRIAL DEMANDED

AGIS SOFTWARE DEVELOPMENT LLC,

Plaintiff,

v.

LG ELECTRONICS INC.,

Defendant.

Case No. 2:17-cv-00515-JRG
(Member Case)

JURY TRIAL DEMANDED

LG ELECTRONICS INC.'S LIST OF TRIAL WITNESSES

Pursuant to the Court's Third Amended Docket Control Order (D.I. 95) entered on December 20, 2018, Defendant LG Electronics Inc. ("Defendant" or "LGEKR") hereby serves, for the issues on which it bears the burden of proof, this identification of trial witnesses it may call live or by deposition.

LGEKR's identification of witnesses is based on its current assessment of the case, with expert discovery still ongoing and without a ruling on any pending motions, such as summary judgment motions, *Daubert* motions, motions to strike, as well as motions that are expected to be filed, such as motions *in limine*. LGEKR also, as of the date of this identification, has not received an indication from Plaintiff AGIS Software Development, LLC ("AGIS") of the nature and/or scope of the testimony and evidence that AGIS intends to present at trial. LGEKR reserves the right to supplement, amend, or otherwise modify this identification based on case developments, and in accordance with Rule 26(a)(3) of the Federal Rules of Civil Procedure and any applicable Local Rules of the United States District Court for the Eastern District of Texas or Standing Orders of the Court. LGEKR reserves the right to call live, by video, or by deposition any witness on this list or any witness on the witness list of, or otherwise identified by, AGIS. LGEKR also reserves the right to introduce deposition testimony as impeachment evidence and/or to call any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which any opposing party objects (including but not limited to custodians of records). LGEKR reserves the right to cross-examine any witness called to testify by any opposing party or any other party, regardless of whether they are disclosed in this witness list, including, but not limited to, by counter-designation of proffered deposition testimony. LGEKR further reserves the right to amend this witness list in view of events at trial or other developments, including evidentiary rulings or other rulings by the Court. LGEKR also reserve

the right not to call any of the witnesses (either live or by deposition) set forth in its identification of trial witnesses, or any amendments thereto. Additionally, LGEKR does not waive, and hereby expressly reserves, any rights and objections to the testimony of any witness identified herein if proffered by AGIS.

Witness	Company	Will Call / May Call / May Call But Likely Will Not Call
Edward Tittel	LGEKR	Will Call
Scott Andrews	LGEKR	Will Call
Christopher Bakewell	LGEKR	Will Call
Joseph McAlexander	AGIS	Will Call
Alan Ratliff	AGIS	Will Call
Malcolm Beyer	AGIS	Will Call
Christopher Rice	AGIS	May Call
Ronald Wisneski	AGIS	May Call
Sandel Blackwell	AGIS	May Call
James Fordyce	AGIS	May Call
Eric Armstrong	AGIS	May Call
Rebecca Clark	AGIS	May Call But Likely Will Not Call
Margaret Beyer	AGIS	May Call But Likely Will Not Call
Cecilia Son	LG Electronics USA, Inc.	May Call
Hongsun Yoon	LG Electronics USA, Inc.	May Call
Yasser Nafei	LG Electronics USA, Inc.	May Call
JuSeong Ryu	LGEKR	Will Call
Jae Young Jang	LGEKR	May Call
Taekyung Hwang	LGEKR	May Call
Jaehong Pak	LGEKR	May Call
Sun Ho Ji	LGEKR	May Call
William Luh	Google LLC	Will Call
Micah Mason	Google LLC	Will Call
Neil Siegel	N/A	May Call

Dated: February 8, 2019

Respectfully submitted,

By: /s/ Michael Berta

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