

EXHIBIT E

**EXHIBIT E: PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC'S ("AGIS")
DEPOSITION DESIGNATIONS, WITH DEFENDANT LG ELECTRONICS INC.'S
("LG") OBJECTIONS AND COUNTER-DESIGNATIONS AND
AGIS'S OBJECTIONS TO LG'S COUNTER-DESIGNATIONS**

LG Objection Key:

DEFENDANT LG ELECTRONICS INC.'S OBJECTIONS LEGEND	
Code	Objection
AA	Asked And Answered
AC	Improper Attorney Commentary
AR	Argumentative
BS	Beyond Scope Of 30(b)(6) Topic
BSD	Beyond Scope Of Direct
CC	Compromise And Offers To Compromise (FRE 408)
CE	Calls For Expert Testimony
CQ	Compound Question
CV	Cumulative
DOC	Requirement of Original (FRE 1002)
E, EXP	Expert Testimony (FRE 702)
FO	Foundation, Assumes Facts Not In Evidence
HER, H	Hearsay (FRE 80, FRE 802)
HH	Hearsay Within Hearsay (FRE 805)
IA, I, IH	Incomplete Answer/Question, Incomplete, Incomplete Hypothetical
IN	Incomplete Designation (FRE 106) (portion of testimony necessary to completed designation is indicated)
LC	Legal Conclusion
LIT	Other Litigation
LQ, L	Leading Question / Leading
MIL	Subject to Motion <i>In Limine</i>
MPT	Misrepresents Prior Testimony
NA	Authentication
NRS	Evidence Not Restricted To Its Proper Scope (FRE 105)
OP, O	Opinion Testimony By Law Witness (FRE 701)
PK	Lacks Personal Knowledge (FRE 602)
PRE, P	Overly Prejudicial (FRE 403)
PR	Privileged
REL, R	Relevance (FRE 401, FRE 402)
SP	Calls for speculation
SUM	The proponent may use a summary, chart, or calculation to prove the content of voluminous writings, recordings, or photographs that cannot be conveniently examined in court. The proponent must make the originals or duplicates available for examination or copying, or both, by other parties at a reasonable time and place. And the court may order the proponent to produce them in court
UN	Unresponsive

EXHIBIT E - AGIS DEPOSITION DESIGNATIONS

V, VM	Vagueness, Vague, Vague/Misleading
WD	Withdrawn Question

AGIS Objection Key:

106 = Incomplete exhibit
 401/402 = Irrelevant
 403 = Prejudicial / confusion / undue delay / outweighs limited relevance
 408 = Settlement
 602 = Lacks personal knowledge
 611(b) = Beyond scope of direct / Improper counter
 701 = Improper lay opinion
 702 = Subject to Daubert
 801/802 = Hearsay
 901 = Authentication
 1002 = Best evidence rule; original required
 1006 = Summary docs without underlying backup docs
 F = Lack of Foundation
 LP = Late production
 NP = Never Produced
 ER = Expert report
 MIL = Subject to Motion in Limine
 D = Duplicative / cumulative
 M = Misleading
 PL = Pleading
 DI = Description insufficient to determine admissibility
 DEPO = Inappropriate inclusion of entire deposition transcript
 CLAW = subject to clawback
 MD = multiple docs
 ID = Inadmissible demonstrative
 AS = Attorney statement
 V = Vague
 IC = Incomplete Designation
 SC = Beyond the scope of Rule 30(b)(6)
 SP = Speculation
 LC = Legal Conclusion
 LE = Leading
 ET = Expert Testimony
 UN = Unresponsive

EXHIBIT E - AGIS DEPOSITION DESIGNATIONS

TAEKYUNG HWANG - NOVEMBER 15, 2018			
AGIS's Designations	LG's Objections	LG's Counter- Designations	AGIS's Objections
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Pg: 9 Ln: 19 - 22			
Pg: 11 Ln: 14 - 16	IN, BS, R, V, PK	11:17	
Pg: 11 Ln: 18 - 23		11:1-13	
Pg: 13 Ln: 3 - 6			
Pg: 13 Ln: 21 - Pg: 14 Ln: 5	IN, BS, R	24:24-25:9	
Pg: 15 Ln: 10 - 17	IN, BS, R		
Pg: 16 Ln: 9 - 13	IN, BS, R		
Pg: 17 Ln: 1 - 8	IN, BS, R	17:9	
Pg: 17 Ln: 10 - 13		17:14	
Pg: 17 Ln: 15 - 17			
Pg: 22 Ln: 2 - Pg: 23 Ln: 2	IN, BS, R	23:3-7	401/402
Pg: 25 Ln: 11 - Pg: 26 Ln: 2	IN, BS, R, AA		
Pg: 26 Ln: 13 - Pg: 27 Ln: 12	IN, BS, R		
Pg: 27 Ln: 14 - 19	IN, BS, R		
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Pg: 32 Ln: 25 - Pg: 35 Ln: 9	IN, BS, R, PK		
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Pg: 41 Ln: 2 - Pg: 42 Ln: 10	IN, BS	42:10-12	
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AGIS's Designations	LG's Objections	LG's Counter-Designations	AGIS's Objections
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Pg: 47 Ln: 24 - Pg: 49 Ln: 23	AA, R, SP		
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