

# EXHIBIT 13

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

AGIS SOFTWARE DEVELOPMENT, LLC,	§	
	§	Case No. 2:17-cv-513-JRG
Plaintiff,	§	(LEAD CASE)
	§	
v.	§	<b><u>JURY TRIAL DEMANDED</u></b>
	§	
HUAWEI DEVICE USA INC., ET AL.,	§	
	§	
Defendants.	§	
	§	
	§	

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AGIS SOFTWARE DEVELOPMENT LLC,	§	
	§	Case No. 2:17-cv-515-JRG
Plaintiff,	§	(CONSOLIDATED CASE)
	§	
v.	§	<b><u>JURY TRIAL DEMANDED</u></b>
	§	
LG ELECTRONICS, INC.,	§	
	§	
Defendant.	§	

**PLAINTIFFS’ FIRST SET OF INTERROGATORIES  
TO LG ELECTRONICS, INC. (NOS. 1-10)**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff AGIS Software Development LLC (“AGIS”) hereby requests that Defendant LG Electronics Inc. (“LG”) respond to the following Interrogatories in writing, under oath, and in accordance with the following definitions and instructions, within thirty (30) days of the date of service thereof. These Interrogatories are continuing in nature and require supplementation in accordance with the Federal Rules of Civil Procedure.

## DEFINITIONS

1. “AGIS,” “AGIS Software” and “Plaintiff” shall mean Plaintiff, AGIS Software Development LLC.
2. “LG,” “Defendant,” “You,” and “Your” shall mean Defendant, LG Electronics, Inc., including without limitation all predecessors-in-interest, successors in-interest, parents, subsidiaries, affiliates, and all past or present officers, directors, trustees, employees, agents, consultants, attorneys, patent agents, entities acting in joint venture, licensing or partnership relationships with any of the defendants in any country.
3. “LG Accused Products” means any and all products made, used, sold, offered for sale, or imported into the United States by LG—and entities controlled by LG, under the instruction of LG, or doing business with LG for the purposes of making, using, selling, offering for sale, or importing any and all such products into the United States—that incorporate technology as defined and alleged in AGIS’s complaints, infringement contentions, initial disclosures, and expert reports. Any products or devices accused of infringing any patent later asserted by Plaintiff in this Action will also be included in the definition of “LG Accused Products.” “LG Accused Products” include each of the instrumentalities identified in AGIS’s Preliminary Infringement Contentions including but are not limited to: V30 (H931, LS998U, H932, H932U, VS996, US998, AS998), X charge (US601, SP320, M327, M322), Q6 (US700), G6+ (US997U), G6 (US997, VS988, AS993, H871, H872, LS993), Fiesta 2 (L173BL, L164VL), V20 (LS997, H910, H918, US996, VS995), X venture (US701, H700), Stylo 3 (LS777), Stylo 3 Plus (MP450, TP450), Tribute HD (LS676), Rebel 2 (L57BL, L58BL, L58VL), Fiesta LTE (L63BL, L64VL), Stylo 3 LTE (L83BL, L84VL), K20 plus (MP260, TP260), Grace LTE (L59BL), K3 (AS110, US110, LS450), Stylo 3 (LS777, M430), Phoenix 3 (M150), Risio 2

(M154), K8 2017 (US215), Stylo 2 V (VS835), K20 (M255, RS501), K20 V (VS501), Aristo (M210), Harmony (M257), G5 (VS987, AS992, H820, H830, LS992, RS988, US992), Aristo Silver (MS210), Aristo Cobalt Blue (MS210UK), Stylo 2 Plus (MS550BK, K550), Fortune (M153), Tribute HD (LS676), X power (K212, K450, LS755, US610), K10 (MS428, K425, K428SG), Stylo 2 (LS775, K540), G Vista (VS880), Escape 3 (K373), Classic (L18VC), Rebel LTE (L43AL, L44VL), Treasure LTE (L51AL, L52VL), Premier LTE (L61AL, L62VL), Stylo 2 LTE (L82VL), K7 (MS330, AS375, K330), K8 (RS500, US375), G4 (US991), K4 (VS425), Optimus Zone 3 (VS425PP), K8 V (VS500, VS500PP), Phoenix 2 (K371), Tribute 5 (LS675), Spree (K120), G Vista 2 (H740), Escape 2 (H443), Risio (H343), Access LTE (L31L), Leon LTE (H345, MS345), G Stylo (H631, MS631, H634, LS770), Volt 2 (LS751), Tribute 2 (LS665), Escape 2 (H445), Logos (US550), Transpyre (VS810PP), G3 (D850, LS990, D851, AS985, VS985, AS990, US990), Ultimate 2 (L41C), Tribute (LS660), G3 Vigor (D725), Realm (LS620), G Vista (D631), Volt (LS740), Optimus Fuel (L34C), Optimus L90 (D415), Optimus F3Q (D520), D820 (D820), G2 (VS9801, D800, D801, LS980), Optimus F6 (D500), Enact (VS890), Optimus F3 (VM720, LS720), Rumor Reflex S (LN272S), Optimus F7 (LG870, US780), Optimus F5 (AS870), Optimus G Pro (E980), Lucid2 (VS870), Spirit 3G (MS870), LGE960 (LGE960), Optimus REGARD (LW770), Mach (LS860), Optimus G (LS970, E970), Optimus L9 (P769), Venice (LG730), Escape (P870), Spectrum 2 (VS930), Splendor (US730), Intuition (VS950), Motion 4 (MS770), Optimus Plus (AS695), Elite (LS696), Viper (LS840), Optimus M+ (MS695), Lucid (VS840), Nitro (P930), Spectrum (VS920), Marquee (LG855), Connect 4G (MS830), Optimus Q (LGL55C), Optimus 2 (AS680), Ignite (AS855), myTouch Q (LGC800DG, LGC800VL), Optimus One (P504), myTouch (LGE739BK), DoublePlay (C729), Optimus Slider (VM701), Esteem (MS910), Enlighten (VS700), Marquee (LS855), Thrill 4G

(P925), Revolution (VS910), Genesis (US760), G2x (P999), Thrive (P506), Phoenix (P505), Optimus C (LW690), Optimus V (WM670), Optimus U (US670), Optimus M (MS690), Axis (LGAS740), Apex (US740), Vortex (VS660), Optimus S (LS670), Ally (VS740), and Optimus T (P509), and any variants of the listed models thereof.

4. “This Action” means *AGIS Software Development LLC v. LG Electronics, Inc.*, 2:17-cv-00515-JRG (E.D. Tex.) which was consolidated into lead case *AGIS Software Development LLC v. Huawei Device USA Inc., et al.*, 2:17-cv-00513-JRG (E.D. Tex.).

5. “’970 Patent” means U.S. Patent No. 8,213,970, entitled “Method of Utilizing Forced Alerts for Interactive Remote Communications.”

6. “’055 Patent” means U.S. Patent No. 9,408,055, entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.”

7. “’251 Patent” means U.S. Patent No. 9,445,251, entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.”

8. “’838 Patent” means U.S. Patent No. 9,467,838, entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.”

9. “Asserted Patents” means the ’970 Patent, the ’055 Patent, the ’251 Patent, and the ’838 Patent.

10. “Related Patent Application” means any patent application or issued patent having a relation by continuation application, continuation-in-part application, and/or divisional application, as defined by the Manual of Patent Examining Procedure (Ninth Edition, Revision 07.2015) §§ 201.06–08, with respect to the Asserted Patents. “Related Patent Application” means any international application and/or foreign counterpart of the Asserted Patents. “Related

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