

**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
	§	(CONSOLIDATED CASE)
Plaintiff,	§	
	§	
v.	§	JURY TRIAL DEMANDED
	§	
LG ELECTRONICS INC.	§	
	§	
Defendant.	§	

**DECLARATION OF NICHOLAS H. LEE IN SUPPORT OF LG ELECTRONICS INC.’S
OPPOSITION TO AGIS SOFTWARE DEVELOPMENT LLC’S MOTIONS *IN LIMINE***

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 Opposition to AGIS Software Development LLC’s (“AGIS”) Motions *In Limine*. 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 the Expert Report of Edward R. Tittel In Rebuttal To The Expert Report of Joseph McAlexander Regarding Alleged Infringement of U.S. Patent Numbers: 8,213,970; 9,408,055; 9,455,251; and 9,467,838, dated January 11, 2019.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of W. Christopher Bakewell's Rebuttal Expert Report Regarding Damages, dated January 11, 2019.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Damages Expert Report of Alan Ratliff On Behalf of AGIS With Respect to LG Electronics Inc., dated December 14, 2018.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the Rebuttal Expert Report of Joseph C. McAlexander III Regarding Validity of U.S. Patent Numbers: 8,213,970; 9,408,055; 9,445,251; and 9,467,838, dated January 11, 2019.

6. Attached hereto as Exhibit 5 is a true and correct copy of the transcript of the deposition of Dr. Neil Siegel, taken on November 14, 2018, in the present action.

7. Attached hereto as Exhibit 6 is a true and correct copy of the transcript of the deposition of Dr. Neil Siegel, taken on November 14, 2018, in the case *AGIS Software Development LLC v. Apple, Inc.*, No. 2:17-cv-513-JRG (lead case), No. 2:17-cv-516-JRG.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles, California on February 19, 2019.

/s/ Nicholas H. Lee

Nicholas H. Lee

Attorney for Defendant LG Electronics Inc.