


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

AGIS SOFTWARE DEVELOPMENT LLC,	§	
	§	Case No. 2:17-CV-0514-JRG
Plaintiff,	§	(LEAD CASE)
	§	
v.	§	<u>JURY TRIAL DEMANDED</u>
	§	
HTC CORPORATION,	§	
	§	
Defendant.	§	

LG ELECTRONICS INC.,	§	Case No. 2:17-CV-0515-JRG
	§	(CONSOLIDATED CASE)
Defendant.	§	
	§	<u>JURY TRIAL DEMANDED</u>

**PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC'S SUR-REPLY
IN OPPOSITION TO LG ELECTRONICS INC.'S
SEALED MOTION FOR SUMMARY JUDGMENT
OF NON-INFRINGEMENT OF U.S. PATENT NO. 8,213,970 (DKT. 112)**

Plaintiff AGIS Software Development LLC (“AGIS”) hereby submits its Sur-Reply in Opposition to LG Electronics Inc.’s (“LG”) Sealed Motion for Summary Judgment of Non-Infringement of U.S. Patent No. 8,213,970 (Dkt. 112).

Pre-installation is a disputed issue. LG disagrees with its own technical expert [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

LG’s Reply does not address AGIS’s evidence showing a genuine issue with respect to inducement. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] LG does not refute that “LG provides user manuals instructing users to use Find My Device and Google Play Protect. Dkt. 193 at 13 (citing Dkt. 193-2 at 74:15-24, 75:5-20, 76:2-9, 76:18-77:18. In particular, LG does not address that the user manual for the LG G6, [REDACTED]

[REDACTED]

[REDACTED] LG’s new argument attempting to distance itself from LG’s own

documents on its customer support website is another point of contention between the parties.

[REDACTED]

[REDACTED]

For the foregoing reasons and those reasons presented in AGIS's opposition, AGIS respectfully requests that the Court deny summary judgment that LG has not infringed U.S. Patent No. 8,213,970.

Dated: February 28, 2019

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**ATTORNEYS FOR PLAINTIFF, AGIS
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CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

The undersigned certifies that the foregoing document is authorized to be filed under seal pursuant to the Protective Order entered in this case.

/s/ Alfred R. Fabricant _____

Alfred R. Fabricant

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