

**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.	§	<b>JURY TRIAL DEMANDED</b>
	§	
HTC CORPORATION, et al.	§	
	§	
Defendant.	§	

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

**DECLARATION OF JUSTIN CHI IN SUPPORT OF DEFENDANTS’ JOINT SUR-  
REPLY IN SUPPORT OF THEIR OPPOSITION TO PLAINTIFF’S MOTION TO  
STRIKE PORTIONS OF THE EXPERT REPORT OF MR. SCOTT ANDREWS**

I, Justin Chi, state and declare as follows:

1. I am an attorney with the firm 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 Texas 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 Defendants HTC Corporation and LG Korea’s sur-reply in support of their opposition to Plaintiff’s motion to strike portions of the expert report of Mr. Scott Andrews. 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 A is a true and correct copy of excerpts of the expert report of Mr. Scott Andrews served on Plaintiff on December 14, 2018.

3. Attached hereto as Exhibit B is a true and correct copy of a claim chart attached as Exhibit C-8 to LG Korea's amended invalidity contentions served on Plaintiff on January 1, 2019.

4. Attached hereto as Exhibit C is a true and correct copy of a claim chart attached as Exhibit C-8 to HTC Corporation's invalidity contentions served on Plaintiff on February 6, 2018.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Palo Alto, California on February 27, 2019.

/s/ Justin Chi  
Justin Chi  
Attorney for Defendant LG Electronics Inc.