

EXHIBIT 2

Exhibit A for US Patent No. 8,213,970 Against LG Accused Products

In these Infringement Contentions, AGIS Software Development LLC (“AGIS”) contends that at least the following U.S. Patent No. 8,213,970 (the “’970 Patent”) identified below are infringed by the Accused Products (*e.g.*, phones) that are manufactured, sold, offered for sale, and/or used by LG Electronics, Inc. (“LG”).

The Accused Products comprise LG products running the Android mobile operating system and manufactured during and after 2011. For example, the Accused Products comprise the following Android-based phones: V30 (H932, H932U, VS996, US998, AS998), X charge (US601, SP320, M327, M322), Q6 (US700), G6+ (US997U), AS993, H871, H872, LS993), Fiesta 2 (L173BL, L164VL), V20 (LS997, H910, H918, US996, VS995), X venture (L64VL), Stylo 3 (LS777), Stylo 3 Plus (MP450, TP450), Tribute HD (LS676), Rebel 2 (L57BL, L58BL, L58VL), Fiesta 1 (L64VL), Stylo 3 LTE (L83BL, L84VL), K20 plus (MP260, TP260), Grace LTE (L59BL), K3 (AS110, US110, LS777, M430), Phoenix 3 (M150), Risio 2 (M154), K8 2017 (US215), Stylo 2 V (VS835), K20 (M255, RS501), Aristo (M210), Harmony (M257), G5 (VS987, AS992, H820, H830, LS992, RS988, US992), Aristo Silver (MS210), Blue (MS210UK), Stylo 2 Plus (MS550BK, K550), Fortune (M153), Tribute HD (LS676), X power (K212, K450), K10 (MS428, K425, K428SG), Stylo 2 (LS775, K540), G Vista (VS880), Escape 3 (K373), Classic (L18VC), Rebel (L44VL), Treasure LTE (L51AL, L52VL), Premier LTE (L61AL, L62VL), Stylo 2 LTE (L82VL), K7 (MS330, AS330, RS500, US375), G4 (US991), K4 (VS425), Optimus Zone 3 (VS425PP), K8 V (VS500, VS500PP), Phoenix 2 (LS675), Spree (K120), G Vista 2 (H740), Escape 2 (H443), Risio (H343), Access LTE (L31L), Leon LTE (H343), (H631, MS631, H634, LS770), Volt 2 (LS751), Tribute 2 (LS665), Escape 2 (H445), Logos (US550), Transpyre (D850, LS990, D851, AS985, VS985, AS990, US990), Ultimate 2 (L41C), Tribute (LS660), G3 Vigor (D725), Vista (D631), Volt (LS740), Optimus Fuel (L34C), Optimus L90 (D415), Optimus F3Q (D520), D820 (D820), C (D801, LS980), Optimus F6 (D500), Enact (VS890), Optimus F3 (VM720, LS720), Rumor Reflex S (LN272S), C (US780), Optimus F5 (AS870), Optimus G Pro (E980), Lucid2 (VS870), Spirit 3G (MS870), LGE960 (LGE960), (LW770), Mach (LS860), Optimus G (LS970, E970), Optimus L9 (P769), Venice (LG730), Escape (P870), Specter (MS695), Splendor (US730), Intuition (VS950), Motion 4 (MS770), Optimus Plus (AS695), Elite (LS696), Viper (LS840), (MS695), Lucid (VS840), Nitro (P930), Spectrum (VS920), Marquee (LG855), Connect 4G (MS830), Optimus C (AS680), Ignite (AS855), myTouch Q (LGC800DG, LGC800VL), Optimus One (P504), myTouch (LGE739B), (C729), Optimus Slider (VM701), Esteem (MS910), Enlighten (VS700), Marquee (LS855), Thrill 4G (P925), Rebel (US760), Genesis (US760), G2x (P999), Thrive (P506), Phoenix (P505), Optimus C (LW690), Optimus V (WM670), Optimus M (MS690), Axis (LGAS740), Apex (US740), Vortex (VS660), Optimus S (LS670), Ally (VS740), and

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AGIS reserves the right to amend this list of accused phones as discovery progresses. For example, the Accused Products comprise the following Android-based tablets: G Pad F2 8.0 (LK460), G Pad X II 8.0 Plus (V530), G Pad X II 10.1 (UK730), G Pad X II 8.0 Gen (AK495, UK495), G Pad X 8.0 (V520, V521), G Pad II 10.1 Full HD (V940N), G Pad X 10.1 (V930), G Pad X 8.0 (V480), G Pad 10.1 (V700), G Pad 7.0 (V400), G Pad F 8.0 1st Gen (AK495, V495, V496, UK495), G Pad F 7.0 (VK810), G Pad F 7.0 (LK430), G Pad 7.0 LTE (VK410, UK410, V410), G Pad 10.1 LTE (VK700), G Pad 8.3 LTE (V510), G Pad 8.3 Black (V500), G7 ThinQ, V30S ThinQ, Zone 4, K30, K10 (2018), K8 (2018), Aristo 2, X4+, X4, X4 II, X4 III, X4 IV 8.0 FHD, X venture, G6, X power2, Stylus 3, G Pad III 10.1 FHD, U, X Skin, X5, X max, X mach, G Pad III 8.0, X power, Stylus 2 Plus, K5, G5 SE, X cam, X screen, K8, Stylus 2, G Pad II 8.3 LTE, V10, Ray, V10, G Pad II 8.3 LTE, Wine Smart, Bello II, G4 Beat, G360, G350, G4c, G4 Dual, G Stylo, G4 Stylus, AKA, Magna, Spirit, Leon, Prime, G2 Lite, G3 Dual-LTE, G3 Screen, F60, L60, L60 Dual, G3 Stylus, L Bello, L Fino, G Pad 8.0 LTE, G Pad 8.0, L20, G Vista (CDMA), G3 LTE-A, G3 S Dual, G3 S, L65 D280, G3 (CDMA), 450, L35, Volt, L80, L80 Dual, L80, L80 Dual D285, G Pad 8.3 LTE, F70 D315, G2 mini LTE (Tegra), G2 mini LTE, G2 mini, L90 Dual D410, L90 Dual D400, L90 Dual D325, L45 Dual X132, L40 D160, L40 Dual D170, G Pro 2, Optimus L4 II Tri E470, Optimus L1 II Tri E470, G Pro Lite, G Pro Lite Dual, Optimus L2 II E435, Vu 3 F300L, G Pad 8.3, Optimus L9 II, Optimus Gj E975W, Optimus E445, Optimus L4 II E440, Optimus Zone VS410, Optimus G Pro E985, OptimusL7 II Dual P715, Optimus L7 II Dual E455, Optimus L5 II E460, Optimus L3 II Dual E435, Optimus L3 II E430, Optimus L1 II E410, Optimus L1 II F200, Optimus G E975, Optimus L5 Dual E615, Optimus L9 P760, Motion 4G MS770, Optimus Vu P895, Optimus LTE2, Optimus True HD LTE P936, Xpression C395, Lucid 4G VS840, Optimus 4X HD P880, Optimus 3D Cube SU870, Optimus L7 P700, Optimus L5 E610, Optimus Vu F100S, Optimus LTE Tag, Optimus Pad LTE, Rumor Reflex LN272, Connect 4G MS840, Viper 4G LTE LS840, X350, Prada 3.0, Nitro HD, Optimus Extravert VN271, S367, Jil Sander Mobile, Optimus LTE SU640, Optimus LTE LU6200, Optimus EX SU880, Optimus Q2 Lu6500, Optimus Hub E510, Optimus Sol E730, Optimus Net Dual, Optimus Net, Optimus Black (CDMA), Optimus Pro C660. AGIS reserves the right to amend this list of accused tablets as discovery progresses. For example, the Accused Products comprise LG products, including but not limited to the phones and tablets as described herein, running any versions (and all intervening updates and sub-versions) of the Android mobile operating system: Android 2.3, 4.0, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 6.0, 7.0, 7.1, 8.0, and 8.1. For example, the Accused Products comprise LG products, including but not limited to the phones and tablets as described herein, running any versions of the following Android-based applications and/or software: A Manager, Find My Phone, Find My Device, Google Latitude, Google Plus, Google Hangouts, Google Maps, Google Now, Google Search, Google Messages, Android Messenger, Google Allo, Google Duo, Gmail, and Google Chrome.

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Accused Products comprise LG products, including but not limited to the phones and tablets described herein, peripheral devices, networks and/or services related to the execution and/or use of the Android mobile operating system versions and/or applications and/or software described herein.

AGIS does not concede that any claims of the '970 Patent that are not listed below are not infringed by the Accused Products. Moreover, the citations to certain documents and other information below are intended to be exemplary only and are not intended to prevent AGIS from citing or relying on additional documents, information, source code, and/or testimony at a later time. The information below is preliminary in nature, and an analysis of LG's products, internal documentation, source code, and/or testimony and other witnesses may more fully and accurately describe the infringing features of its accused products. Accordingly, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions once such additional information is made available. Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as discovery progresses; in view of the Court's claim construction order(s); in view of any positions taken by LG, including but not limited to its positions on claim construction, invalidity, and/or non-infringement; and in connection with the preparation and filing of reports.

Claim	Accused Products
1[P]. A communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising: a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that	<p>The Accused Products together constitute a “communication system” for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising: a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a touch screen display, a CPU, and memory.</p> <p>LG makes, uses, sells, and otherwise provides this communication system by making, using, selling, and otherwise providing and importing Android OS devices such as Accused Products.</p> <p>The Accused Products meet the claim limitations by providing device-location tracking and other features as those features described below. For example, the Accused Products meet the c</p>

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includes a CPU and a touch screen display a CPU and memory;

because they are pre-installed with Android mobile operating systems containing device-location tracking features as provided in the claims limitations herein. For Accused Products run applications and/or software that run within the Android mobile operating system and that use components of the Android mobile operating system to provide device-location tracking features. Upon information and belief, in addition to the components and software of the Android mobile operating system itself, the following applications and/or software running on the Android mobile operating system and use components of the Android mobile operating system to provide device-location tracking features: Android Device Manager, Find My Device.

Android Device Manager is the predecessor to Find My Device and has been available as a pre-installed feature since 2013 and downloadable as a software application. The Find My Device, often called the “new and improved Android Device Manager” or “Find My Device” is now part of the standard Google Play Protect suite of services that is enabled on all devices,” i.e., the Accused Products running Android OS. AGIS submitted the Find My Device feature of the Accused Products as representative of this method. AGIS respectfully requests the Court to supplement these contentions to the extent that LG requires additional information. P.R. 3-1 and for any other reason for which it may deem necessary.

See, e.g., <https://www.androidcentral.com/find-my-device>;
<https://support.google.com/android/answer/6160491?hl=en>;
<https://android.googleblog.com/2013/08/find-your-lost-phone-with-android.html>;
<https://play.google.com/store/apps/details?id=com.google.android.apps.adm&hl=en>;
<https://www.blog.google/products/android/google-play-protect/>
Each “Google Account” is associated with a pre-determined number of devices, which can be used on a smartphone, tablet, and a touchscreen, and which are registered when a customer acquires an Accused Product. LG Android OS based device.

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