

EXHIBIT A

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

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

HUAWEI DEVICE USA INC., ET AL.,

Defendants.

Case No. 2:17-CV-0513-JRG
(LEAD CASE)

JURY TRIAL DEMANDED

AGIS SOFTWARE DEVELOPMENT, LLC

Plaintiff,

v.

LG ELECTRONICS, INC.,

Defendants.

Case No. 2:17-CV-0515-JRG
(CONSOLIDATED CASE)

JURY TRIAL DEMANDED

**CONFIDENTIAL ATTORNEYS' EYES
ONLY**

**LG ELECTRONICS, INC.'S OBJECTIONS AND RESPONSES TO
PLAINTIFF AGIS SOFTWARE DEVELOPMENT, LLC'S
FIRST SET OF INTERROGATORIES (NOS. 1-10)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant LG Electronics, Inc. ("LGEKR" or "Defendant") by its attorneys hereby provides responses and objections to Plaintiff AGIS Software Development LLC's ("AGIS") First Set of Interrogatories (Nos. 1-10) (the "Request" or "Interrogatories").

PRELIMINARY STATEMENT

These responses, while based on diligent investigation by LGEKR and its counsel, reflect only the current status of LGEKR's knowledge regarding the subjects and information about which inquiry has been made. LGEKR may not yet fully understand the significance of certain

information, or facts, has not yet discovered all information, facts and documents pertinent to this action, and has not yet identified or located all persons with knowledge or pertinent information, facts or documents. LGEKR will continue to assess and analyze the facts and gather and review evidence in connection with this action up to the time of trial.

Therefore, these responses are neither intended as, nor shall in any way be deemed, an admission or representation that further information or documents relevant to this Request do not exist. As this action proceeds, LGEKR will discover further documents, facts and other information. Without in any way obligating itself to do so, LGEKR reserves the right to modify or supplement its responses herein with such pertinent documents, facts or other information as subsequently may be discovered. Furthermore, these responses are given without prejudice to LGEKR's right to use or rely on at any time, including trial, any subsequently discovered information, facts or documents, or information or facts omitted from these responses as a result of mistake, error, oversight or inadvertence. LGEKR further reserves the right to produce additional documents, facts or information at any time, including trial, and to object on appropriate grounds to the introduction into evidence of any portion of these responses.

All disclosures made herein are produced strictly pursuant to the stipulated protective order in this case.

GENERAL OBJECTIONS

Specific objections to Interrogatory Nos. 1-10 are made on an individual basis in the responses below. In addition to these specific objections, LGEKR makes the following General Objections to AGIS's Interrogatory Nos. 1-10, including without limitation the instructions and definitions set forth therein. These General Objections are hereby incorporated by reference into the responses to Interrogatory Nos. 1-10. For particular emphasis, LGEKR has, from time to

time, expressly included one or more of the General Objections in certain of its responses below. LGEKR's response to Interrogatory Nos. 1-10 is submitted without prejudice to, and without in any respect waiving, any General Objections not expressly set forth in a specific response. Accordingly, the inclusion of any specific objection in response to an interrogatory below is neither intended as, nor shall in any way be deemed to be, a waiver of any General Objection or of any other specific objection that may be asserted at a later date. In addition, the failure to include at this time any General or specific objection to an interrogatory is neither intended as, nor shall in any way be deemed, a waiver of LGEKR's right to assert that or any other objection at a later date.

1. LGEKR objects to the Interrogatories to the extent they call for the disclosure of information or the production of documents that are shielded from discovery by attorney-client privilege, the work product doctrine, or any related joint defense or common interest privilege, privileges applicable to settlement materials or documents or information which constitute trial preparation materials, or any other applicable privilege (collectively, "Privileged Information"). Any statement herein to the effect that LGEKR will provide information in response to an interrogatory is limited to information that does not fall within the scope of any Privileged Information.

2. LGEKR objects to the production of any information or documents to the extent they include confidential, proprietary, trade secret, private or financial information that is protected from disclosure by any applicable trade secret or privacy statute or law. LGEKR will only provide such information pursuant to the confidentiality protections embodied in the Federal Rules of Civil Procedure and the terms of the protective order entered in this action, and

to the extent applicable, with the consent of any third party that may claim confidentiality rights with respect to information responsive to the interrogatory request.

3. LGEKR objects to the definition of “LG,” “Defendant,” “You,” and “Your” as overly broad and unduly burdensome to the extent it includes all predecessors-in-interest, successors in-interest, parents, subsidiaries, affiliates, and entities acting in joint venture, licensing or partnership relationships with any of the defendants in any country. LGEKR understands this term to mean LG Electronics, Inc. as the named defendant in the above-captioned action.

4. LGEKR objects to the definition of “LG Accused Products” as overly broad and unduly burdensome to the extent it includes products made, used, sold, offered for sale, or imported into the United States by entities other than LG Electronics, Inc. LGEKR objects to the definition of “LG Accused Products” as vague and ambiguous insofar as it is defined to include products “that incorporate technology as defined and alleged in AGIS’s complaints, infringement contentions, initial disclosures, and expert reports.” LGEKR further objects to the definition of “LG Accused Products” as overly broad to the extent that it includes any products or devices accused of infringing any patent later asserted by Plaintiff in this Action. LGEKR understands this term to mean only those specific products made, used, sold, offered for sale, or imported into the United States by LG Electronics, Inc. among those identified by AGIS in its Infringement Contentions, and that include the Android-based applications or software identified in Plaintiff’s Infringement Contentions that allow users to utilize forced message alerts or to form groups with other users such that users may view each other’s locations on a map and engage in communication.

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