

Exhibit 11

RESTRICTED -- ATTORNEY'S EYES ONLY

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	
	§	Case No. 2:17-CV-0513-JRG
	§	(LEAD CASE)
Plaintiff,	§	
	§	
v.	§	<u>JURY TRIAL DEMANDED</u>
	§	
HUAWEI DEVICE USA INC., ET AL.,	§	
	§	
Defendants.	§	
	§	

**PLAINTIFF AGIS SOFTWARE DEVELOPMENT LLC'S SECOND SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO DEFENDANT HTC CORPORATION'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF (NOS. 1-15)**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff AGIS Software Development LLC ("AGIS" or "Plaintiff") hereby supplements its response to Defendant HTC Corporation's ("HTC") First Set of Interrogatories to Plaintiff (Nos. 1-15) in writing, under oath, and in accordance with the following definitions and instructions. These Interrogatories are continuing in nature and require supplementation in accordance with the Federal Rules of Civil Procedure as follows:

These responses are made solely for the purposes of this action, and are made without waiving, or intending to waive, the right at any time to revise, correct, modify, supplement or clarify any response provided herein or the right to object on any proper grounds to the use of these responses, for any purpose in whole or in part, in any subsequent proceedings or any other action. The right to raise any applicable objections at any time is expressly reserved. A response to any interrogatory herein should not be taken as an admission or acceptance of the existence of any facts set forth or assumed by such interrogatory, or that such response constitutes admissible

evidence. The responses herein reflect only the present state of AGIS' investigation and the present state of discovery. Except as otherwise indicated, an objection and/or response to a specific interrogatory does not imply that facts responsive to the interrogatory exist.

AGIS incorporates by reference the general and specific objections in *AGIS's Objections and Responses to HTC Corporation's First Set of Interrogatories to Plaintiff (Nos. 1-15)*, dated June 18, 2018, and *AGIS's Supplemental Objections and Responses to HTC Corporation's First Set of Interrogatories to Plaintiff (Nos. 1-15)*, dated August 17, 2018.

INTERROGATORY NO. 8

If You contend that AGIS is entitled to relief for HTC's alleged infringement of any Asserted Claim, state the basis for Your contention on a patent by patent basis, including but not limited to:

- (a) whether AGIS contends it is entitled to lost profits or a reasonable royalty;
- (b) the amount of lost profits or reasonable royalty by each Accused Instrumentality;
- (c) whether the royalty rate is an industry royalty rate, has been paid on comparable patents or technology, was discussed in any Document, was paid as a part of a license or settlement, or is based on any of AGIS's or any of AGIS's Companies' established licensing policies or marketing programs;
- (d) the date on which AGIS contends that such relief should begin;
- (e) whether the amount is based on revenues that HTC received from the Accused Instrumentalities or a portion of such revenues attributable to features of the Accused Instrumentalities, and the extent that HTC utilized the Accused Instrumentalities; and
- (f) the basis for the amount, including but not limited to the data on which You based Your calculation, the method by which You calculated the amount, and all persons who have knowledge upon which Your calculations are based.

RESPONSE TO INTERROGATORY NO. 8

AGIS hereby incorporates the General Objections as if fully set forth herein. AGIS further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case because the burden or expense of the proposed discovery outweighs its likely benefit. AGIS further objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, attorney work product doctrine, and/or any other applicable privilege. AGIS further objects to this interrogatory on the ground it seeks information publicly available. AGIS further objects to this interrogatory on the ground it seeks information not within the custody, possession, or control of AGIS. AGIS further objects to this interrogatory as it seeks information that is the topic of expert discovery.

AGIS objects to this interrogatory as vague, overbroad, ambiguous and confusing. AGIS objects to the terms "basis" and "established" as vague, overbroad, ambiguous, and uncertain. AGIS objects to the phrase "any of AGIS's or any of AGIS's Companies" as vague, overbroad, ambiguous, overbroad, and uncertain.

AGIS objects to this interrogatory because the interrogatory is an improper compound request. AGIS objects to this interrogatory because the interrogatory contains multiple distinct sub-parts (at least six), each of which counts towards HTC's total number of interrogatories.

AGIS objects to this interrogatory because AGIS's answer depends on information requested from HTC by AGIS and is subject to HTC's supplemental responses to AGIS's pending interrogatories to HTC.

Notwithstanding its general and specific objections, AGIS answers as follows:

Discovery in this case is still ongoing and AGIS continues to investigate this matter. AGIS reserves the right to supplement the response to this interrogatory to identify additional documents pursuant to Fed. R. Civ. P. 33(d). AGIS reserves the right to supplement the answer to this interrogatory upon the resolution of the above objections and/or an appropriate narrowing of the scope of this request.

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