

EXHIBIT 11

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

**AGIS SOFTWARE DEVELOPMENT
LLC,**

Plaintiff,

v.

**HUAWEI DEVICE USA INC., HUAWEI
DEVICE CO., LTD. AND HUAWEI
DEVICE (DONGGUAN) CO., LTD.,**

Defendants.

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**Civil Action No. 2:17-CV-513-JRG
(Lead Case)**

JURY TRIAL DEMANDED

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS**

Plaintiff AGIS Software Development LLC (“AGIS”) hereby makes the following infringement disclosures under the Patent Local Rules with respect to United States Patent Nos. 9,467,838 (the “’838 Patent”), 9,445,251 (the “’251 Patent”), 9,408,055 (the “’055 Patent”), and 8,213,970 (the “’970 Patent”) (collectively, “patents-in-suit”). AGIS’s investigation is ongoing and discovery has not yet commenced. Accordingly, these disclosures are based on information available to AGIS at this time. AGIS reserves the right to supplement this disclosure after further discovery from the defendants and non-parties, particularly documents and other discovery regarding the Huawei Accused Products set forth below. AGIS also reserves the right to assert additional claims of the patents-in-suit, accuse different products, or find alternative literal and/or equivalent infringing elements in the Huawei Accused Products.

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO PATENT LOCAL RULE 3-1

A. ASSERTED CLAIMS

Defendants Huawei Device USA, Inc., Huawei Device Co., Ltd., and Huawei Device (Dongguan) Co., Ltd. (“Defendants” or “Huawei”) have infringed and continue to infringe at least the following claims of the patents-in-suit in connection with the Huawei Accused Products set forth below:

- Claims 1-54 of the ’838 Patent;
- Claims 1-35 of the ’251 Patent;
- Claims 1-54 of the ’055 Patent; and
- Claims 1 and 3-9 of the ’970 Patent.

AGIS reserves the right to seek leave of court to add, delete, substitute, or otherwise amend this list of asserted claims should further discovery, the Court’s claim construction, or other circumstances so merit.

B. ACCUSED INSTRUMENTALITIES

AGIS is currently aware that the following Huawei Accused Products infringe each of the patents-in-suit either alone or in concert with one or more other Huawei Accused Products:

- Activa 4G
- Ascend
- Ascend D1
- Ascend D1 Quad

- Ascend D1 Quad XL
- Ascend D2
- Ascend G300
- Ascend G350
- Ascend G510
- Ascend G525
- Ascend G526
- Ascend G6
- Ascend G600
- Ascend G610
- Ascend G615
- Ascend G620
- Ascend G620S
- Ascend G630
- Ascend G7
- Ascend G700
- Ascend II
- Ascend Mate
- Ascend Mate 2 4G
- Ascend Mate7
- Ascend P1 LTE

- Ascend P1 LTE
- Ascend P1 S
- Ascend P2
- Ascend P6
- Ascend P7
- Ascend P7 Mini
- Ascend Q
- Ascend W1
- Ascend W2
- Ascend Y
- Ascend Y200
- Ascend Y210
- Ascend Y220
- Ascend Y221
- Ascend Y300
- Ascend Y300II
- Ascend Y320
- Ascend Y330
- Ascend Y511
- Ascend Y520
- Ascend Y530

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