

# EXHIBIT D

# EXHIBIT 11

## (Corrected)



discovery from the defendants and non-parties, particularly documents and other discovery regarding the ZTE 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 ZTE Accused Products.

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

**A. ASSERTED CLAIMS**

Defendants ZTE (TX) Inc., ZTE (USA) Inc., and ZTE Corporation (“Defendants” or “ZTE”) have infringed and continues to infringe at least the following claims of the patents-in-suit in connection with the ZTE 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<sup>1</sup>.

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 ZTE Accused Products infringe each of the patents-in-suit either alone or in concert with one or more other ZTE Accused Products:

- Adamant
- Agent
- Anthem 4G
- Aspect

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<sup>1</sup> AGIS is no longer pursuing the previously-asserted claims of U.S. Patent Number 9,749,829.

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