# EXHIBIT 13

# D'Aquila, Danielle

**From:** Moore, Steve <steve.moore@pillsburylaw.com>

**Sent:** Wednesday, May 02, 2018 10:51 AM

**To:** D'Aquila, Danielle; Nash, Brian C.; Ko, Jack; Wisnia, Howard N.

Cc: AGIS-Lit

Subject: RE: AGIS Software Development, LLC v. ZTE Corp., No. 2:17-cv-517 (E.D. Tex. 2017)

Follow Up Flag: Follow up Flag Status: Flagged

### Danielle

We don't represent them in this matter. I would invite you to reach out to the team that does. As you know, Finnegan Henderson is the firm responsible for the representation of the ZTE entities in the AGIS Software case. We are not authorized to take any action on behalf of any party in this case.

Best regards,

Steve

# Steve Moore, JD., Ph.D. | Partner

Pillsbury Winthrop Shaw Pittman LLP

501 West Broadway, Suite 1100 | San Diego, CA 92101-3575

t 619.544.3112 | f 619.236.1995 | m +1.760.807.8651

Suite 2404, 24/F Kinwick Centre 32 Hollywood Road | Central Hong Kong

t +852.3959.7500 | m +86.138.1669.0401

steve.moore@pillsburylaw.com | website bio

From: D'Aquila, Danielle <DD'Aquila@brownrudnick.com>

Sent: Wednesday, May 2, 2018 7:16 AM

To: Moore, Steve <steve.moore@pillsburylaw.com>; Nash, Brian C. <brian.nash@pillsburylaw.com>; Ko, Jack

<jack.ko@pillsburylaw.com>; Wisnia, Howard N. <howard.wisnia@pillsburylaw.com>

Cc: AGIS-Lit <agislit@brownrudnick.com>

Subject: RE: AGIS Software Development, LLC v. ZTE Corp., No. 2:17-cv-517 (E.D. Tex. 2017)

## Counsel.

I am following up regarding my below email. Let me know if you are available for a call this week to discuss whether your client, ZTE Corporation, authorizes you to accept service of the Summons and Complaint and the Amended Complaint in the above-referenced action.

Regards,

Danielle





### Danielle A. D'Aquila

Counselor at Law

Brown Rudnick LLP Seven Times Square New York, NY 10036 T: 212-209-4985 F: 212-938-2885 ddaquila@brownrudnick.com www.brownrudnick.com

Please consider the environment before printing this e-mail

From: D'Aquila, Danielle

**Sent:** Saturday, April 21, 2018 9:42 AM

To: steve.moore@pillsburylaw.com; brian.nash@pillsburylaw.com; jack.ko@pillsburylaw.com;

howard.wisnia@pillsburylaw.com

Cc: AGIS-Lit

Subject: AGIS Software Development, LLC v. ZTE Corp., No. 2:17-cv-517 (E.D. Tex. 2017)

Counsel,

We represent Plaintiff AGIS Software Development, LLC ("AGIS") in an action against ZTE Corporation, AGIS Software Development, LLC v. ZTE Corp., et al., No. 2:17-cv-517 (E.D. Tex. June 21, 2017) ("AGIS v. ZTE"). We are reaching out to you because, based on publicly available information, it is our understanding that you currently represent ZTE Corporation. We initiated service of process of the Summons and Complaint and corresponding exhibits (attached hereto) in the AGIS v. ZTE action through the Hague Convention over eight months ago. While the typical time period for receiving proof of service from the Central Authority has expired, it is our understanding that ZTE Corporation still has not been served and that service may take another five months. Approximately four months after initiating the lawsuit, AGIS amended its complaint, which is also attached.

As U.S. counsel to ZTE Corporation, please let us know whether ZTE Corporation would be willing to waive formal service of the Summons and Complaint and Amended Complaint through the Hague Convention, and accept service of process of these documents via email through counsel at your firm. We are generally available next week to discuss AGIS's request.

Regards, Danielle D'Aquila



Danielle A. D'Aquila

Counselor at Law

Brown Rudnick LLP Seven Times Square New York, NY 10036 T: 212-209-4985 F: 212-938-2885 ddaquila@brownrudnick.com



# Case 2:17-cv-00517-JRG Document 64-14 Filed 05/21/18 Page 4 of 4 PageID #: 893

Please consider the environment before printing this e-mail
***************************************
The information contained in this electronic message may be legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brown Rudnick LLP, (617) 856-8200 (if dialing from outside the US, 001-(617)-856-8200) and purge the communication immediately without making any copy or distribution.
***************************************

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender or the Pillsbury Winthrop Shaw Pittman Help Desk at Tel: 800-477-0770, Option 1, immediately by telephone or by return E-mail and delete this message, along with any attachments, from your computer. Thank you.