

Exhibit B

Exhibit A for US Patent No. 10,341,838 Against Lyft Accused Products

Based on information presently available, AGIS Software Development LLC (“AGIS”) contends that Lyft (collectively “Lyft” or “Defendant”) infringes claims 1-26 (the “Asserted Claims”) of U.S. Patent No. 10,341,838 through the Accused Products which are manufactured, sold, offered for sale, and/or used by Lyft.

The Accused Products comprise all versions of the Lyft Application made, used, sold, offered for sale, or used after September 21, 2004. For example, the Accused Products comprise the Lyft application installed on all Android and Windows Mobile based mobile devices (e.g. smartphones, tablets, laptops, and smart watches), and any version thereof. AGIS reserves the right to amend this list of Accused Products as discovery progresses.

Lyft directly infringes each of the Asserted Claims by using, importing, testing, selling, and/or offering the Accused Products in violation of 35 U.S.C. § 271(a).

Lyft indirectly infringes the Asserted Claims in violation of 35 U.S.C. § 271(b) by inducing third parties and/or customers, to directly infringe through their operation and use of the Accused Products. Lyft has knowingly induced this direct infringement by, *inter alia*, (i) selling, importing, or otherwise providing the Accused Products with the intent that the Accused Products will be operated and used in a manner that practices the Asserted Claims; (ii) advertising the Accused Products. Lyft’s marketing and promotional materials for the Accused Products are found on Lyft’s website, and in App stores of operating systems for which the Accused Products are made available. For example, Lyft offers customers instructions and/or manuals for the Accused Products that instruct customers to, among other things, use the services in the Accused Products. Lyft’s website also offers support to customers, including instruction to, among other things, use the Accused Products share location information with a group of users. On information and belief, Lyft knows that its actions will result in infringement of the Asserted Claims, or subjectively believes that there is a high probability that its actions will result in infringement of the Asserted Claims but has taken deliberate actions to avoid learning these facts.

Lyft also contributorily infringes each of the Asserted Claims in violation of 35 U.S.C. § 271(c) by selling, offering for sale, and otherwise providing the Accused Products, which when used directly infringe the Asserted Claims. These actions constitute a material part of the Asserted Claims.

On information and belief, the charted version of the Lyft application is representative of all versions of the Lyft application, including all variants of the Accused Products made, sold, offered for sale, or used on any version of the Android or Windows Mobile operating systems.

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AGIS does not concede that any claims of the '838 Patent that are not listed below are not infringed by its Accused Products. Moreover, the citations to certain documents and other information below are intended to be exemplary and not to foreclose AGIS from citing or relying on additional documents, information, source code, and/or testimony. These contentions are preliminary in nature, and an analysis of Lyft's products, internal documentation, source code, and other relevant witnesses may more fully and accurately describe the infringing features of its Accused Products. Accordingly, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions once such additional information is made available. Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as the litigation progresses; in view of the Court's claim construction order(s); in view of any positions taken by Lyft, including its positions on claim construction,¹ invalidity, and/or non-infringement; and in connection with the preparation and filing of its reports.

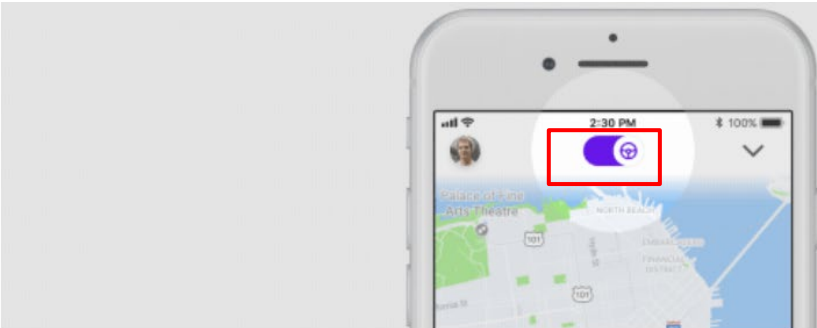
The contents of each claim cell below on which another claim cell depends are expressly incorporated by reference into the dependent cell, as if set forth in their entirety therein.

¹ The construction of claim terms herein is consistent with the constructions in *AGIS Software Dev. LLC v. Huawei*, No. 2:17-cv-00513-JRG, Dkt. No. 205 (Lead Case) (E.D. Tex. Oct. 10, 2018) and *AGIS Software Dev. LLC v. Google*, No. 2:17-cv-00361-JRG, Dkt. No. 147 (Lead Case) (E.D. Tex. Dec. 20, 2020). AGIS reserves the right to update its constructions and contentions in view of this Court's claim construction order.

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Claim 10,341,838	- Exemplary Supporting Evidence Regarding Accused Products
1[P]. A method performed by one or more servers each having one or more processors, the method comprising:	<p>The Lyft Accused Products perform the computer implemented method as set forth below, directly and/or indirectly by performing, inducing others to perform, and/or contributing to the method performed by one or more servers each having one or more processors</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Lyft provides the Lyft app for passengers and the Lyft Driver app for drivers, riders and drivers, in conjunction with Lyft's servers and services, provide users with information request, view, and track locations of passengers/riders using real-time maps and communicate with one or more servers with processors (either hardware or software). The Lyft server(s) communicate with the Lyft apps for riders and drivers. The Lyft server(s) and their services related to and instructions for processing user/device/vehicle accounts, location data, and maps.</p> <h2>Lyft Driver app</h2> <p>We've separated the passenger and driver experiences into two separate mobile apps — one exclusively for passengers (named the Lyft app) and the other exclusively for drivers (named the Lyft Driver app).</p> <p>The Lyft Driver app will eventually be standard for all drivers and required for driving. At this time, drivers keep using the Lyft app to give rides. Don't worry! While we have some planned improvements to the Lyft app, we've kept its features the same.</p> <p>https://help.lyft.com/hc/en-ca/articles/115013079208-Lyft-Driver-app</p> <h2>What is Lyft?</h2> <p>Lyft is a platform that connects drivers with individuals and organizations that need rides.</p> <p>https://www.lyft.com/drive-with-lyft</p>

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Claim 10,341,838	- Exemplary Supporting Evidence Regarding Accused Products
	 <p>Go online</p> <p>Open your Lyft Driver app and tap the steering wheel icon. Lyft will now find the closest passenger to your location requesting a ride. Turn on some music and get comfortable: that first ride request may come quickly or may take a while, depending on the number of current passenger requests. https://www.lyft.com/hub/posts/how-to-give-a-ride</p>

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