

EXHIBIT A

SPECIFIC OBJECTIONS AND RESPONSES

INTERROGATORY NO. 11

Identify every AGIS or AGIS Inc. product and versions of such product that you assert practices the Asserted Claims, including LifeRing and ASSIST products, and, for each such product, state the complete basis for that assertion including, but not limited to, a claim chart showing how each element of each Asserted Claim is met by each AGIS or AGIS Inc. product, including citations to all source code in any AGIS or AGIS, Inc. product alleged to practice the Asserted Claims, and identify all facts, witnesses, documents, and source code in support of or against your assertion, including at least the three people most knowledgeable about your assertion that AGIS or AGIS Inc. product embody the claims.

RESPONSE TO INTERROGATORY NO. 11

AGIS incorporates by reference its General Objections as if fully set forth herein. AGIS objects to this Interrogatory as overly broad, unduly burdensome, and seeking information not proportional to the needs of the case. AGIS objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege. AGIS objects to this Interrogatory as seeking information that is properly the subject of expert reports before the deadline for such disclosures. AGIS further objects to this Interrogatory to the extent it calls for a legal conclusion. AGIS objects to this Interrogatory as seeking information that is not relevant to the claims or defenses of any party to this action and not proportional to the needs of the case. AGIS further objects to this Interrogatory as unclear, vague, and ambiguous, particularly with respect to phrases “AGIS or AGIS Inc. product and versions of such product,” “state the complete basis for that assertion,” and “identify all facts, witnesses, documents, and source code in support of or against your assertion.” AGIS objects to this Interrogatory as having multiple subparts, each counting towards Defendant’s total number of Interrogatories.

Subject to and without waiving its General and Specific Objections, AGIS responds as follows:

AGIS Software Development LLC does not presently sell any commercial products.

AGIS Software Development LLC identifies the LifeRing and ASSIST software products, both of which are made and sold by AGIS Software Development LLC's sister company, AGIS, Inc., as products that practice the claimed inventions. AGIS, Inc. is a licensee of the Asserted Patents.

On September 2, 2021, counsel for AGIS Software Development LLC informed Defendant that a first production of source code was available for inspection on a secure computer at McKool Smith's Dallas Office, 300 Crescent Court, #1500, Dallas, Texas 75201.

AGIS identifies, pursuant to Fed. R. Civ. P. 33(d), the source code production made available in its entirety on the secure computer at McKool Smith's Dallas Office, from which information responsive to this Interrogatory may be obtained.

AGIS incorporates by reference, as if fully set forth herein, its Disclosure of Asserted Claims and Infringement Contentions and accompanying document production, served on May 19, 2021. AGIS will supplement its response to this Interrogatory if necessary, once the Court and/or the parties clarify the scope of the claims by virtue of the claim construction process. AGIS incorporates by reference, as if fully set forth herein, its forthcoming expert report on technical issues, damages, validity, and/or infringement, which will be served in accordance with the Court's Docket Control Order (Dkt. 80).

Discovery in this case is ongoing and AGIS continues to investigate this matter. AGIS reserves the right to supplement its response to this Interrogatory to identify additional documents, *e.g.*, pursuant to Fed. R. Civ. P. 33(d).

11/3/2021 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11:

AGIS incorporates by reference its General Objections as if fully set forth herein. Subject to and without waiving its General and Specific Objections, AGIS responds as follows:

AGIS identifies the following documents as containing information responsive to this Interrogatory: AGISSOFTWARE_0660161-AGISSOFTWARE_0660615.

INTERROGATORY NO. 12

For each AGIS or AGIS Inc. Product identified in response to Interrogatory No. 11 that is an application on or service for a phone or other mobile device, providing at least the following information: (i) an identification of the name (including internal and external names) and platform (e.g., operating system) for each AGIS or AGIS Inc. Product; (ii) an identification of each version and revision (including internal and external names) of the AGIS or AGIS Inc. Products; (iii) the first and last dates each version and revision of the AGIS or AGIS Inc. Products was made available for download and/or purchase; and (iv) a detailed explanation of the timeline (including the first date) of testing for each version and revision (including any corresponding pre-release test or beta versions) of the AGIS or AGIS Inc. Products. For each AGIS or AGIS Inc. Product identified in response to Interrogatory No. 11 that is a server, provide at least the following information: (i) the internal and external name(s) and model number(s) of each AGIS or AGIS Inc. server; (ii) the physical location of each AGIS or AGIS Inc. server; (iii) an identification of each version and revision of each AGIS or AGIS Inc. application or AGIS or AGIS Inc. service used with or provided by each AGIS or AGIS Inc. server; (iv) the identification of each function or service (e.g., accounts, maps, payments) carried out by each AGIS or AGIS Inc. server; and (v) the identification of each Entity and/or AGIS or AGIS Inc. business unit that puts into practice each AGIS or AGIS Inc. server.

RESPONSE TO INTERROGATORY NO. 12

AGIS incorporates by reference its General Objections as if fully set forth herein. AGIS objects to this Interrogatory as overly broad, unduly burdensome, and seeking information not proportional to the needs of the case. AGIS objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege. AGIS objects to this Interrogatory as seeking information that is properly the subject of expert reports before the deadline for such disclosures. AGIS further objects to this Interrogatory to the extent it calls for a legal conclusion. AGIS objects to this Interrogatory as seeking information that is not relevant to the claims or defenses of any party to this action, and not proportional to the needs of the case. AGIS further objects to this Interrogatory as unclear, vague, and ambiguous, particularly with respect to phrases “earliest priority date,” “the subject matter to which each person contributed,” and “the dates and places each such person assisted, supervised, or was otherwise so involved.” AGIS objects to this Interrogatory as having multiple subparts, each counting towards Defendant’s total number of Interrogatories.

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