EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

AGIS SOFTWARE DEVELOPMENT LLC, Plaintiff, v. LYFT INC., Defendant.	Civil Action No. 21-cv-00072-JRG (E.D. Tex.)
AGIS SOFTWARE DEVELOPMENT LLC, Plaintiff, v. UBER TECHNOLOGIES, INC., Defendant.	Civil Action No. 21-cv-00026-JRG (E.D. Tex.)

EXPERT REPORT OF NEIL SIEGEL REGARDING THE INVALIDITY OF U.S. PATENT NOS. 7,031,728 (CLAIM 7); 7,630,724 (CLAIMS 9, 12-16); 8,213,970 (CLAIMS 2, 10, 12-13); 10,299,100 (ALL CLAIMS); 10,341,838 (ALL CLAIMS)

involved both teaching graduate classes in systems engineering, and supervising the master's degree projects of systems engineering students.

23. By 2004, I had more than twenty-five years of actual working experience in designing and developing defense systems, and, in particular, systems that provided situational awareness and command-and-control functionality. I was personally involved with the design, engineering, and deployment of some of the first mobile situational awareness technologies, including the Forward-Area Air Defense Command, Control, and Intelligence System, the Army FBCB2 system, and its derivative, the Joint Capability Release (used by both the U.S. Army and the U.S. Marine Corps).

24. By 2004, I had more than 15 years experience as a senior engineering executive. In that capacity, I wrote job descriptions, hired and supervised the hiring of hundreds of employees, wrote standards of skill and performance for engineering job categories, set evaluation criteria for employee norms and conducted performance evaluations of employees, defined skills sets expected for employees by job category, planned and supervised in-house training and external continuing educational opportunities, and performed &/or participated in many other aspects of setting expectations and norms for engineers, rating and evaluating engineers, and so forth. I did all of this at large scale, that is, in an organization that had thousands of engineers as employees; by 2001, I was in fact the vice-president in charge of all of those thousands of engineers. I continued after 2004 in these roles until my retirement at the end 2015. This experience, I believe, enables me to speak with authority concerning what a person of ordinary skill in the art (POSA) in the relevant fields of engineering would know and be expected to know.

III. PRIOR EXPERT TESTIMONY AND COMPENSATION

25. I testified as an expert by deposition once in the last four years.

use of the IP protocol by FBCB2 and the Tactical Internet, for example, in the last paragraph of page SIEGEL000972.

131. Communication between participants within FBCB2 is established and accomplished via the use of the IP protocol, together with other protocols (such as TCP; see, for example, the citation for RFC 793 on page SIEGEL000963). Different servers are established and used for different types of traffic (see, for example, the discussion that starts in paragraph 3.4.1.3 on page SIEGEL000987, and the table at SIEGEL000322). As described in those sources, the data (these actually can be any mixture of data, packets of digitized voice, imagery, etc.) are forwarded from the sending unit to a server, and then forwarded from the server to the appropriate (one or more) receiving units. Thus, the mobile devices in FBCB2 are connected to an internet connection.

7. exchanging IP addresses using SMS or other digital message format between and among each of the network participant users so that communications between participants is established via IP or transmission of a network participant's IP address to a server which then transmits data to other network participants using the IP address previously

132. FBCB2 implemented a short-message-service format and protocol of its own along with other digital messaging, as described in the '724 Patent, as understood by a POSA.

133. The FBCB2 short message services (one of the digital message services within FBCB2) consists, like all such services, of both a message format and a communication protocol, both of which are optimized for the sending of short messages. Within FBCB2, the message format is the variable-message format described at SIEGEL000904 and the following pages, and the communication protocol is that disclosed in U.S. patent 6,701,375, which appears at SIEGEL001233 and the pages that follow). A person of ordinary skill (POSA) in the art on September 20, 2004 would have understood that that FBCB2's short message system was technically and functionally equivalent to any commercial SMS message.

134. A person of ordinary skill in the art at the time the Patents-in-suit were invented would have recognized that a system implemented over military radios could also be implemented using cellular communications, cell phones, and telephone numbers as contact information. For example, FBCB2 was designed to allow for the use of many types of communications devices and methods (a list was provided above, at 80). The Army's original request for proposal (issued in 1994, as described above) specified that FBCB2 should be able to communicate by at least EPLRS and SINCGARS military radios. In response to this requirement, TRW's original FBCB2 proposal (submitted in 1994, as described above) incorporated a design that *separated* the communications function from other functions of the FBCB2 system, and thereby allowed multiple communications devices and methods to be "plugged in" to the FBCB2 system; in fact, it allowed multiple such communications devices and methods to be plugged in to the FBCB2 system simultaneously, and to route data traffic between and across those multiple communications (exactly as in done by the commercial internet). As a result, multiple communications devices and methods can be made to work readily with the FBCB2 system. It was this design that allowed TRW to implement several additional communications devices and methods before 2004, the NIPRNet, the SIPRNet, the MSE, including Ka-band and L-band satellites, WiFi (IEEE 802.11) devices, and, in an experimental context, additional military radios, the Iridium mobile telephone system, and also cellular mobile phones (these terms are all defined above).

135. As noted above, TRW also conducted experiments that demonstrated (by reducing the technique to practice) that the Tactical Internet could work using commercial mobile phones as a communication device. A cellular version of FBCB2 was not ultimately fielded due to operational considerations. That is, because there are a relatively small number of cellular towers in any given area, they could be easily found and destroyed, and therefore any military system that

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