

# EXHIBIT I

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

AGIS SOFTWARE DEVELOPMENT  
LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.  
and SAMSUNG ELECTRONICS  
AMERICA, INC.,

Defendants.

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Case No. 2:19-cv-362

JURY TRIAL DEMANDED

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, AGIS Software Development LLC (“AGIS Software” or “Plaintiff”) files this original Complaint against Defendants Samsung Electronics Co., Ltd. (“Samsung Electronics”) and Samsung Electronics America, Inc. (“Samsung Electronics America”) (collectively “Samsung” or “Defendants”) for patent infringement under 35 U.S.C. § 271 and alleges as follows:

THE PARTIES

- 1. Plaintiff AGIS Software is a limited liability company organized and existing under the laws of the State of Texas, and maintains its principal place of business at 100 W. Houston Street, Marshall, Texas 75670. AGIS Software is the owner of all right, title, and interest in and to U.S. Patent Nos. 9,820,123 and 9,749,829 (the “Patents-in-Suit”).
- 2. Defendant Samsung Electronics is a corporation organized and existing under the laws of the Republic of Korea, with its principal place of business at 129 Samsung-Ro, Yeongtong-Gu, Suwon-Si, Gyeonggi-Do, 443-742, Republic of Korea. Upon information and

**COUNT I**  
**(Infringement of the '123 Patent)**

17. Paragraphs 1 through 17 are incorporated herein by reference as if fully set forth in their entireties.

18. AGIS Software has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the '123 Patent.

19. Defendants have and continue to directly infringe at least claim 23 of the '123 Patent, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States the Accused Devices without authority and in violation of 35 U.S.C. § 271(a).

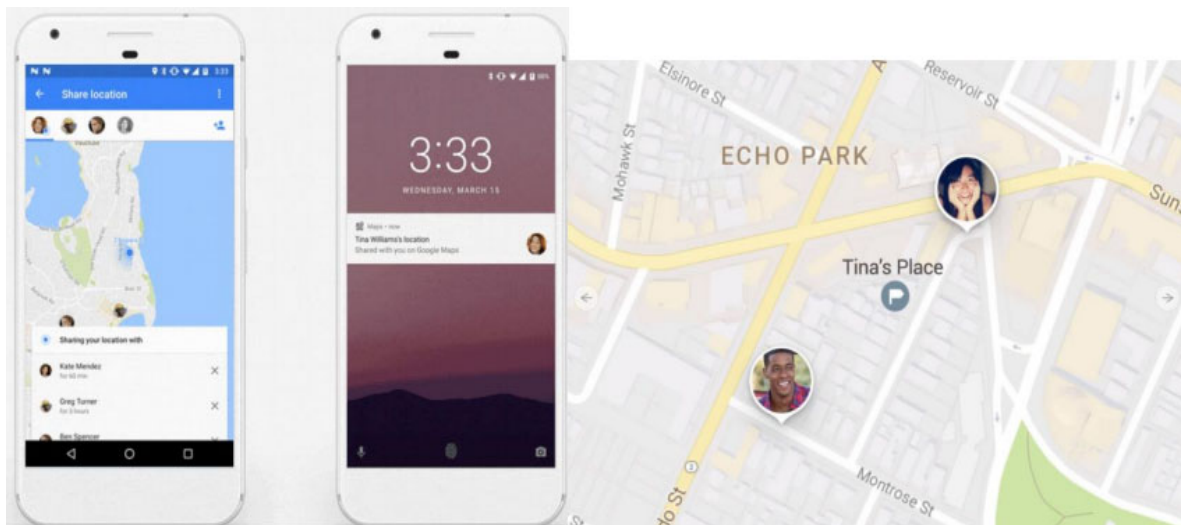
20. Defendants have and continue to indirectly infringe at least claim 23 of the '123 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States the Accused Devices and by instructing users of the Accused Devices to perform methods claimed in the '123 Patent. For example, Defendants, with knowledge that the Accused Devices infringe the '123 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continue to actively, knowingly, and intentionally induce direct infringement of the '123 Patent.

21. For example, Defendants have indirectly infringed and continue to indirectly infringe at least claim 23 of the '123 Patent in the United States because Defendants' customers use such devices, including at least the Google Maps, Find My Device (formerly Android Device Manager), Find My Phone, Google Messages, Android Messenger, Samsung Messages, Google Hangouts, Google Plus, Google Latitude, Google Play Protect, and Google Chrome apps installed on the Accused Devices, in accordance with Defendants' instructions and thereby

directly infringe at least one claim of the '123 Patent in violation of 35 U.S.C. § 271. Defendants directly and/or indirectly intentionally instruct its customers to infringe through training videos, demonstrations, brochures, installations and/or user guides, such as those located at one or more of the following:

<https://ss7.vzw.com/is/content/VerizonWireless/Devices/Samsung/note/samsung-galaxy-note9-ug.pdf> and <https://www.samsung.com/my/support/mobile-devices/how-do-i-use-android-device-manager-to-locate-lock-and-erase-my-lost-samsung-galaxy-s5/>, and Google agents and representatives located within this Judicial District. Defendants are thereby liable for infringement of the '123 Patent under 35 U.S.C. § 271(b).

22. For example, Defendants' Accused Devices are pre-installed with at least the Google Maps app which allows users to share their locations and view other users' locations on a map and to communicate with those users via the Google Maps app (as shown below) which is integrated with Google Messages, Android Messenger, and Samsung Messages and which are also pre-installed on the Accused Devices.



23. For example, the exemplary Accused Devices allow users to establish groups and to exchange messages via interaction with Google's servers and Samsung's servers which

34. Defendants have and continue to indirectly infringe at least claim 68 of the '829 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling and/or importing into the United States the Accused Devices and by instructing users of the Accused Devices to perform methods claimed in the '829 Patent. For example, Defendants, with knowledge that the Accused Devices infringe the '829 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continue to actively, knowingly, and intentionally induce direct infringement of the '829 Patent.

35. For example, Defendants have indirectly infringed and continue to indirectly infringe at least claim 68 of the '829 Patent in the United States because Defendants' customers use such devices, including at least the Google Maps, Find My Device (formerly Android Device Manager), Find My Phone, Google Messages, Android Messenger, Google Hangouts, Google Plus, Google Latitude, Google Play Protect, and Google Chrome apps installed on the Accused Devices, in accordance with Defendants' instructions and thereby directly infringe at least one claim of the '829 Patent in violation of 35 U.S.C. § 271. Defendants directly and/or indirectly intentionally instruct its customers to infringe through training videos, demonstrations, brochures, installations and/or user guides, such as those located at one or more of the following: <https://ss7.vzw.com/is/content/VerizonWireless/Devices/Samsung/note/samsung-galaxy-note9-ug.pdf> and <https://www.samsung.com/my/support/mobile-devices/how-do-i-use-android-device-manager-to-locate-lock-and-erase-my-lost-samsung-galaxy-s5/>, and Google agents and representatives located within this Judicial District. Defendants are thereby liable for infringement of the '829 Patent under 35 U.S.C. § 271(b).

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