

**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.,

Defendant.

CIVIL ACTION NO. 2:22-cv-263-JRG

JURY TRIAL DEMANDED

**DEFENDANT SAMSUNG'S RESPONSE TO PLAINTIFF AGIS SOFTWARE
DEVELOPMENT LLC'S OPPOSED MOTION FOR LEAVE TO FILE
SUPPLEMENTAL BRIEF REGARDING PLAINTIFF'S OPPOSED MOTION FOR
LEAVE TO AMEND ITS INFRINGEMENT CONTENTIONS**

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TABLE OF EXHIBITS

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Plaintiff's Exhibits Filed With Plaintiff's Opening Brief (Dkt. 72)	
A (Dkt. 72-2)	AGIS's Amended Disclosure of Asserted Claims and Infringement Contentions
B (Dkt. 72-3)	AGIS's Amended Exhibit A for U.S. Patent No. 9,820, 123 to its Disclosure of Asserted Claims and Infringement Contentions
C (Dkt. 72-4)	AGIS's Amended Exhibit B for U.S. Patent No. 9,749,829 to its Disclosure of Asserted Claims and Infringement Contentions
D (Dkt. 72-5)	AGIS's Amended Exhibit C1 for U.S. Patent No. 8,213,970 to its Disclosure of Asserted Claims and Infringement Contentions
E (Dkt. 72-6)	AGIS's New Exhibit C2 for U.S. Patent No. 8,213,970 to its Disclosure of Asserted Claims and Infringement Contentions
F (Dkt. 72-7)	AGIS's Amended Exhibit D1 for U.S. Patent No. 9,467,838 to its Disclosure of Asserted Claims and Infringement Contentions
G (Dkt. 72-8)	AGIS's New Exhibit D2 for U.S. Patent No. 9,467,838 to its Disclosure of Asserted Claims and Infringement Contentions
H (Dkt. 72-9)	Redline of AGIS's Amended Disclosure of Asserted Claims and Infringement Contentions
Defendants' Additional Exhibits Filed With Their Opposition (Dkt. 85)	
1 (Dkt. 85-2)	List of AGIS District Court and ITC Cases Pulled from Docket Navigator
2 (Dkt. 85-3)	AGIS's 2017 Complaint Against ZTE
3 (Dkt. 85-4)	AGIS's 2017 Complaint Against Apple
4 (Dkt. 85-5)	AGIS's 2017 Complaint Against LG
5 (Dkt. 85-6)	AGIS's 2017 Complaint Against HTC
6 (Dkt. 85-7)	AGIS's 2017 Complaint Against Huawei
7 (Dkt. 85-8)	AGIS's 2019 Complaint Against Google (Google I)
8 (Dkt. 85-9)	AGIS's 2019 Complaint Against Samsung (Samsung I)
9 (Dkt. 85-10)	AGIS's 2019 Complaint Against Waze
10 (Dkt. 85-11)	AGIS's 2022 ITC Complaint against Google, Samsung, and 11 Other Respondents
11 (Dkt. 85-12)	Initial Determination on AGIS's June 15, 2023 Motion to Terminate ITC Investigation
12 (Dkt. 85-13)	AGIS's 2023 Complaint Against Google (Google II)
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14 (Dkt. 85-15)	AGIS Email Chain Noticing Samsung of its Intention to File the Pending Motion for Leave
15 (Dkt. 85-16)	AGIS Email Chain Raising "Group" Claim Construction Issue
16 (Dkt. 85-17)	AGIS Supplemental Claim Construction Brief on "Group" from the ITC Investigation
17 (Dkt. 85-18)	AGIS Infringement Claim Chart from the Google I Case for FMD for the '970 Patent
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19	AGIS and Google Agreement Regarding the Production of the Sorin Dinu Deposition Transcript
20	Redacted Declaration of Shannon Shaper Filed in Support of Motions to Transfer in <i>AGIS Software Development LLC v. Waze Mobile Limited, Google LLC, Samsung Electronics Co. Ltd, and Samsung Electronics America, Inc.</i> , Nos. 2:19-CV-00359-JRG, 2:19-CV-00361-JRG, 2:19-CV-00362-JRG, Dkt. 28-18 (E.D. Tex.)
21	AGIS's 2022 Complaint Against ASUS
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