

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

**DECLARATION OF MARK LIANG IN SUPPORT OF SAMSUNG
ELECTRONICS CO. LTD. AND SAMSUNG ELECTRONICS AMERICA,
INC.'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**

I, Mark Liang, declare and state as follows:

1. I am a Partner at O'Melveny & Myers LLP, counsel for Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. ("Samsung Electronics") in the above captioned matter.
2. I submit this declaration in support of Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.'s Response to Plaintiff AGIS Software Development LLC's Opposed Motion for Leave to File Supplemental Brief Regarding Plaintiff's Motion for Leave to Amend Its Disclosure of Asserted Claims and Infringement Contentions, filed concurrently herewith. I have personal knowledge of the statements set forth in this declaration and, if called as a witness, would testify competently.
3. Attached hereto as **Exhibit 19** is a true and correct copy of a written agreement entered between AGIS and Google on July 21, 2023 regarding the production of the June 15, 2023 Deposition Transcript of Sorin Dinu from AGIS's International Trade Commission action, with cited sections highlighted.
4. Attached hereto as **Exhibit 20** is a true and correct copy of a redacted version of the Declaration of Shannon Shaper, which was filed in support of motions to transfer in in *AGIS Software Development LLC v. Waze Mobile Limited, Google LLC, Samsung Electronics Co. Ltd, and Samsung Electronics America, Inc.*, Nos. 2:19-CV-00359-JRG, 2:19-CV-00361-JRG, 2:19-CV-00362-JRG (E.D. Tex.), with cited sections highlighted. This copy was filed in the Samsung case, 2:19-CV-00362-JRG, as Dkt. 28-18.
5. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts from AGIS's 2022 complaint against ASUS filed in the Eastern District of Texas (Case No. 2:22-CV-00440-JRG), with cited sections highlighted.
6. Attached hereto as **Exhibit 22** is a true and correct copy of excerpts from AGIS's 2022 complaint against BLU Products filed in the Eastern District of Texas (Case No. 2:22-CV-00441-JRG), with cited sections highlighted.
7. Attached hereto as **Exhibit 23** is a true and correct copy of excerpts from AGIS's

2022 complaint against Caterpillar filed in the Eastern District of Texas (Case No. 2:22-CV-00442-JRG), with cited sections highlighted.

8. Attached hereto as **Exhibit 24** is a true and correct copy of excerpts from AGIS's 2022 complaint against HMD filed in the Eastern District of Texas (Case No. 2:22-CV-00443-JRG), with cited sections highlighted.

9. Attached hereto as **Exhibit 25** is a true and correct copy of excerpts from AGIS's 2022 complaint against Kyocera filed in the Eastern District of Texas (Case No. 2:22-CV-00444-JRG), with cited sections highlighted.

10. Attached hereto as **Exhibit 26** is a true and correct copy of excerpts from AGIS's 2022 complaint against Lenovo and Motorola filed in the Eastern District of Texas (Case No. 2:22-CV-00445-JRG), with cited sections highlighted.

11. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts from AGIS's 2022 complaint against OnePlus filed in the Eastern District of Texas (Case No. 2:22-CV-00446-JRG), with cited sections highlighted.

12. Attached hereto as **Exhibit 28** is a true and correct copy of excerpts from AGIS's 2022 complaint against Panasonic filed in the Eastern District of Texas (Case No. 2:22-CV-00447-JRG), with cited sections highlighted.

13. Attached hereto as **Exhibit 29** is a true and correct copy of excerpts from AGIS's 2022 complaint against Sony filed in the Eastern District of Texas (Case No. 2:22-CV-00448-JRG), with cited sections highlighted.

14. Attached hereto as **Exhibit 30** is a true and correct copy of excerpts from AGIS's 2022 complaint against TCL filed in the Eastern District of Texas (Case No. 2:22-CV-00449-JRG), with cited sections highlighted.

15. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts from AGIS's 2022 complaint against Xiaomi filed in the Eastern District of Texas (Case No. 2:22-CV-00450-JRG), with cited sections highlighted.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on August 17, 2023.

Dated: August 17, 2023

/s/ Mark Liang

Mark Liang