

# EXHIBIT 27

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No.
	§	
Plaintiff,	§	<b><u>JURY TRIAL DEMANDED</u></b>
	§	
v.	§	
	§	
ONEPLUS TECHNOLOGY (SHENZHEN) CO., LTD.,	§	
	§	
Defendant.	§	
	§	

**PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, AGIS Software Development LLC (“AGIS Software” or “Plaintiff”) files this Complaint against Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“OnePlus” or “Defendant”) 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. 8,213,970, 9,445,251, 9,467,838, 9,749,829, and 9,820,123 (the “Patents-in-Suit”).

2. On information and belief, Defendant is a corporation organized and existing under the laws of China, with a principal place of business at 18F, Tairan Building, Block C, Tairan 8<sup>th</sup> Road, Chegongmiao, Futian District, Shenzhen, Guangdong 518040, China. On information and belief, Defendant may be served pursuant to the provisions of the Hague Convention. OnePlus is a leading manufacturer and seller of smartphones in the world and throughout the United States.

Alternatively, Defendant believed there was a high probability that others would infringe the '970 Patent but remained willfully blind to the infringing nature of others' actions.

23. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 10 of the '970 Patent in the United States because Defendant's customers use the Accused Products, including at least the Find My Device (formerly known as Android Device Manager) Apps and/or services or the Accused Products with the Find My Device Apps and/or services, alone or in conjunction with additional Accused Products, in accordance with Defendant's instructions and thereby directly infringe at least claim 10 of the '970 Patent in violation of 35 U.S.C. § 271. Defendant directly and/or indirectly intentionally instructs 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://service.oneplus.com/content/dam/support/user-manuals/common/OnePlus\\_10T\\_5G\\_User\\_Manual\\_EN.pdf](https://service.oneplus.com/content/dam/support/user-manuals/common/OnePlus_10T_5G_User_Manual_EN.pdf);  
[https://service.oneplus.com/content/dam/support/user-manuals/common/OnePlus\\_9\\_Pro\\_User\\_Manual\\_EN.pdf](https://service.oneplus.com/content/dam/support/user-manuals/common/OnePlus_9_Pro_User_Manual_EN.pdf);  
[https://service.oneplus.com/content/dam/support/user-manuals/common/OnePlus\\_10\\_Pro\\_User\\_Manual\\_EN.pdf](https://service.oneplus.com/content/dam/support/user-manuals/common/OnePlus_10_Pro_User_Manual_EN.pdf); and Defendant's agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '970 Patent under 35 U.S.C. § 271(b). Alternatively, Defendant believed there was a high probability that others would infringe the '970 Patent but remained willfully blind to the infringing nature of others' actions.

24. For example, Defendant directly infringes and/or indirectly infringes by instructing its customers to infringe by performing claim 10 of the '970 Patent, including: a method of

e. An order awarding AGIS Software treble damages under 35 U.S.C. § 284 as a result of Defendant's willful and deliberate infringement of the Patents-in-Suit;

f. Entry of judgment declaring that this case is exceptional and awarding AGIS Software its costs and reasonable attorney fees under 35 U.S.C. § 285; and

g. Such other and further relief as the Court deems just and proper.

Dated: November 18, 2022

Respectfully submitted,

/s/ Alfred R. Fabricant

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