

EXHIBIT 26

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No.
	§	
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
	§	
v.	§	
	§	
LENOVO GROUP LTD.,	§	
LENOVO (UNITED STATES) INC., and	§	
MOTOROLA MOBILITY LLC,	§	
	§	
Defendants.	§	
	§	

PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, AGIS Software Development LLC (“AGIS Software” or “Plaintiff”) files this Complaint against Defendants Lenovo Group Ltd. (“Lenovo Group”), Lenovo (United States) Inc. (“Lenovo US”), and Motorola Mobility LLC (“Motorola”) (collectively, “Lenovo” 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. 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 Lenovo Group is a company organized and existing under the laws of China, with its principal place of business located at 6 Chuang ye Road, Haidian District, Beijing 100085, China. On information and belief, Lenovo Group may be served pursuant to the provisions of the Hague Convention. Lenovo Group is a leading manufacturer and

25. For example, Defendants have indirectly infringed and continue to indirectly infringe at least claim 10 of the '970 Patent in the United States because Defendants' 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 Defendants' instructions and thereby directly infringe at least claim 10 of the '970 Patent in violation of 35 U.S.C. § 271. Defendants directly and/or indirectly intentionally instruct their 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://help.motorola.com/hc/7102/10/pdf/help-motorola-edge-10-global-en-us.pdf>; https://download.lenovo.com/consumer/mobiles_pub/lenovo_tab_p11_ug_en_202105.pdf; and Defendants' agents and representatives located within this Judicial District. Defendants are thereby liable for infringement of the '970 Patent under 35 U.S.C. § 271(b). Alternatively, Defendants believed there was a high probability that others would infringe the '970 Patent but remained willfully blind to the infringing nature of others' actions.

26. For example, Defendants directly infringe and/or indirectly infringe by instructing their customers to infringe by performing claim 10 of the '970 Patent, including: a method of receiving, acknowledging and responding to a forced message alert from a sender PDA/cell phone to a recipient PDA/cell phone, wherein the receipt, acknowledgment, and response to said forced message alert is forced by a forced message alert software application program, said method comprising the steps of: receiving an electronically transmitted electronic message; identifying said electronic message as a forced message alert, wherein said forced message alert comprises a voice or text message and a forced message alert application software packet, which triggers the

e. An order awarding AGIS Software treble damages under 35 U.S.C. § 284 as a result of Defendants' 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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