Case 2:22-cv-00263-JRG-RSP Document 123-6 Filed 09/07/23 Page 1 of 12 PageID #: 10129

EXHIBIT B



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

		§	
AGIS SOFTWARE DEVELOPMENT		§	
LLC,		§	Case No.
		§	
	Plaintiff,	§	JURY TRIAL DEMANDED
		§	
V.		§	
		§	
GOOGLE LLC,		§	
		§	
	Defendant.	§	
		§	

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, AGIS Software Development LLC ("AGIS Software" or "Plaintiff") files this original Complaint against Defendant Google LLC ("Defendant" or "Google") 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, 9,408,055, 9,445,251, 9,467,838, 9,749,829, and 9,820,123 (the "Patents-in-Suit").
- 2. Defendant Google is a Delaware corporation and maintains its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043, and may be served with process via its registered agent, Corporation Service Company at 251 Little Falls Drive, Wilmington, DE 19808. Upon information and belief, Google does business in Texas, directly or through intermediaries, and offers its products and/or services, including those accused herein



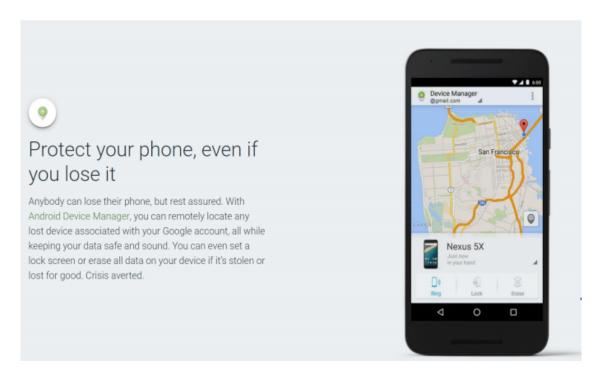
- 83. AGIS Software licenses its patent portfolio, including the '970, '055, '251, '838, '829, and '123 Patents, to AGIS, Inc. AGIS, Inc.'s LifeRing product practices one or more of the patents in the AGIS portfolio and AGIS, Inc. has marked its products accordingly.
- 84. AGIS Software and all previous assignees of the Patents-in-Suit have complied with the requirements of 35 U.S.C. § 287(a).
- 85. Google licenses the Android operating system to third parties, who design their own products that utilize the Android operating system. The Android operating system is the most widely used in smartphones and other mobile devices.
- 86. Google manufactures, uses, sells, offers for sale, and/or imports into the United States products, such as [1] Google smartphones and tablets (including, but not limited to, the Nexus S, Galaxy Nexus, Nexus 4, Nexus 5, Nexus 6, Nexus 5X, Nexus 6P, Nexus 7 1st Gen., Nexus 7 2nd Gen., Nexus 10, Google Pixel, Pixel XL, Pixel 2, Pixel 2 XL, Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel C, and Pixel Slate), [2] Chrome-based notebooks (including, but not limited to, Chromebook Pixel 2013, Chromebook Pixel 2015, and Pixelbook), [3] the Android operating system (including, but not limited to, versions 2.2 through 10.0, [4] the Android Wear OS (including, but not limited to, versions 4.4W1, 4.4W2, Android Wear 1.0 through Android Wear 2.9, and Wear OS 1.0 through Wear OS 2.8), [5] Android Auto, [6] Android-based applications and/or services (including, but not limited to, Google Maps, Find My Device (formerly Android Device Manager), Trust Contacts, Family Link, Play Protect, Chrome browser, Hangouts, Latitude, Messages, Android Messenger, Google Plus, Google Duo, Google Contacts, and Android Auto, and [8] Google's servers for providing services related to the above Android OS, Android Wear OS, Android Auto, and Android-based applications (collectively, "Accused Products"). The Accused Products include applications and software including, but

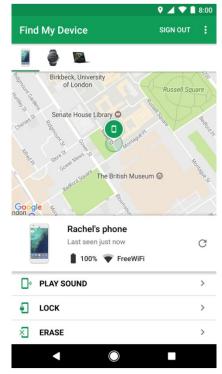


not limited to, the above-listed applications and/or features as components of its operating system and as downloads from a pre-installed application store, such as the Play Store, in the Accused Products. The Accused Products, together with Google's software components such as, but not limited to, Google Maps, Find My Device (former Android Device Manager), Trust Contacts, Family Link, Play Protect, Chrome browser, Hangouts, Latitude, Messages, Android Messenger, Google Plus, Google Duo, Google Contacts, and Android Auto apps are configured to interact with Google's servers which provide services related to the above Android OS, Android Wear OS, Android Auto, and Android-based applications, among other services provided by Google and utilized by Google's customers when operating the Accused Products, such as the Google smartphones and tablets, Chrome-based notebooks, Android Wear, and Android Auto, identified herein.

87. The Accused Products include functionalities that allow users to form groups with other users such that users may view each other's locations on a map and engage in communication including text, voice, and multimedia-based communication. Additionally, the users may form groups that include their own devices in order to track their own lost or stolen devices, as shown below; to send and receive communications from their own lost or stolen Accused Products; and to remotely control the lost or stolen Accused Products.







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