



**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'S REPLY IN
SUPPORT OF MOTION TO SEVER AND TRANSFER TO THE NORTHERN
DISTRICT OF CALIFORNIA CLAIMS AGAINST GOOGLE FIND MY DEVICE**

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") in the above captioned matter.

2. I submit this declaration in support of Samsung's Reply in Support of Motion to Sever Claims Based on Google's Find My Device and Transfer Those Claims to the Northern District of California, 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 T** is a true and correct copy of AGIS's July 21, 2023 Exhibit C1 claim chart for U.S. Patent No. 8,213,970 to AGIS's Disclosure of Asserted Claims and Infringement Contentions in this case, *AGIS Software Development LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, No. 2:22-CV-00263-JRG-RSP.

4. Attached hereto as **Exhibit U** is a true and correct copy of AGIS's July 21, 2023 Exhibit D1 claim chart for U.S. Patent No. 9,467,838 to AGIS's Disclosure of Asserted Claims and Infringement Contentions in this case, *AGIS Software Development LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, No. 2:22-CV-00263-JRG-RSP.

5. Attached hereto as **Exhibit V** is a true and correct copy of AGIS's July 21, 2023 Exhibit C2 claim chart for U.S. Patent No. 8,213,970 to AGIS's Disclosure of Asserted Claims and Infringement Contentions in this case, *AGIS Software Development LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, No. 2:22-CV-00263-JRG-RSP.

6. Attached hereto as **Exhibit W** is a true and correct copy of AGIS's July 21, 2023 Exhibit D2 claim chart for U.S. Patent No. 9,467,838 to AGIS's Disclosure of Asserted Claims and Infringement Contentions in this case, *AGIS Software Development LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, No. 2:22-CV-00263-JRG-RSP.

7. Attached hereto as **Exhibit X** is a true and correct copy of AGIS's March 23, 2020 infringement contention claim chart for U.S. Patent No. 8,213,970 in *AGIS Software Development LLC v. Google LLC*, No. 2:19-CV-00361-JRG.

8. Attached hereto as **Exhibit Y** is true and correct copy of AGIS's March 23, 2020 infringement contention claim chart for U.S. Patent No. 9,467,838 in *AGIS Software Development LLC v. Google LLC*, No. 2:19-CV-00361-JRG.

9. Attached hereto as **Exhibit Z** is a true and correct copy of AGIS's July 7, 2023 Subpoena to Google LLC in this case, *AGIS Software Development LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, No. 2:22-CV-00263-JRG-RSP.

10. Attached hereto as **Exhibit AA** is a true and correct copy of AGIS's July 7, 2023 Subpoena to PAR Government Systems Corporation in this case, *AGIS Software Development LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, No. 2:22-CV-00263-JRG-RSP.

11. Attached hereto as **Exhibit BB** is a true and correct copy of AGIS's July 7, 2023 Subpoena to Samsung SDS America, Inc. in this case, *AGIS Software Development LLC v. Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.*, No. 2:22-CV-00263-JRG-RSP.

12. Attached hereto as **Exhibit CC** is a true and correct copy of AGIS Software Development LLC's Response in Opposition to Samsung Electronics Co., Ltd. and Samsung Electronics America's Motion to Transfer Venue in *AGIS Software Development LLC v. Google LLC, Samsung Electronics Co. Ltd, and Samsung Electronics America, Inc.*, Nos. 2:19-CV-00361-JRG (Lead Case), 2:19-CV-00362-JRG (Consolidated Case), with cited sections highlighted. This copy was filed in the Google case, 2:19-CV-00361-JRG, as Dkt. 35.

13. Attached hereto as **Exhibit DD** is true and correct copy of the Declaration of Malcolm K. Beyer, Jr., which was filed in opposition to Samsung Electronics Co., Ltd. and Samsung Electronics America's Motion to Transfer Venue in *AGIS Software Development LLC v. Google LLC, Samsung Electronics Co. Ltd, and Samsung Electronics America, Inc.*, Nos. 2:19-CV-00361-JRG (Lead Case), 2:19-CV-00362-JRG (Consolidated Case). This copy was filed in the consolidated case, 2:19-CV-00361-JRG, as Dkt. 35 Ex. 1, and cited sections are highlighted.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on September 25, 2023.

Dated: September 25, 2023

/s/ Mark Liang

Mark Liang