

EXHIBIT E

Exhibit D - Claim Chart for U.S. Patent No. 9,467,838 Against Google

Based on information presently available, AGIS Software Development LLC (“AGIS Software”) contends that Defendant Google LLC (“Google” or “Defendant”) infringes claims 1-54 (the “Asserted Claims”) of U.S. Patent No. 9,467,838 (the “’838 Patent”) through the Accused Products which are manufactured, sold, offered for sale, and/or used by Google.

The Accused Products include Google products comprising and/or running the Android mobile operating system and/or android based applications, made, used, sold, offered for sale, or imported during and after 2013.

For example, the Accused Products include, but are not limited to, the following Accused Devices: Android-based phones, tablets, smartwatches, such as 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, Pixel 2, Pixel 2 XL, Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL Pixel C, Chromebook Pixel, Google Pixelbook, Google Pixelbook Go, Pixel Slate, Android One Smartphones (*e.g.* the Motorola Moto X4, Motorola One Power, Motorola One, Motorola One Action, Xiaomi Mi A1, Xiaomi Mi A2, Xiaomi Mi A3, Nokia 2.3, Nokia 6.2, Nokia 7.2, Nokia 3.2, Nokia 2.2, Nokia 4.2, Nokia X71, Nokia 3.1 Plus, Nokia 5.1 Plus, Nokia 3.1, Nokia 6.1, Nokia 7 Plus, Nokia 8.1, Nokia 7.1, Nokia 6.1 Plus, Nokia 5.1, and Nokia 8 Sirocco), Android Go Smartphones, and any variants thereof made, used, sold, offered for sale, or imported during and after 2013. AGIS reserves the right to amend this list of Accused Products as discovery progresses.

For example, the Accused Products include, but are not limited to, the following Accused Services: including but not limited to the following versions (and all intervening updates and sub-versions) of the Android mobile operating systems: Android 1.5 (Cupcake); Android 1.6 (Donut); Android 2.0 (Éclair); Android 2.2 (Froyo); Android 2.3 (Gingerbread); Android 3.0 (Honeycomb); Android 4.0 (Ice Cream Sandwich); Android 4.1 (Jelly Bean); Android 4.4 (KitKat); Android 5.0 (Lollipop); Android 6.0 (Marshmallow); Android 7.0 (Nougat); Android 8.0 (Oreo); Android 9 (Pie); Android 10; Android 11; Android One; Android Go; and any variants thereof made, used, sold, offered for sale, or imported during and after 2013, whether or not associated with an Accused Device or another android device.

For example, the Accused Services further comprise but are not limited to, the following Android-based applications and/or software: Google Maps, Find My Device (formerly Android Device Manager), Messages, Android Messenger, Hangouts, Google Plus, Google Latitude, Google Play Protect, Google Chrome, and any variants thereof made, used, sold, offered for sale, or imported during and after 2013, among other relevant applications and/or features.

For example, the Accused Products include, but are not limited, Accused Infrastructures, such as servers and supporting computer systems associated with the Accused Services, and any variants thereof made, used, sold, offered for sale, or imported during and after 2013.

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limited to, positions on claim construction,¹⁰ invalidity, and/or non-infringement; and in connection with the preparation and exchange of expert reports.

Claim - 9,467,838	Exemplary Supporting Evidence Regarding Accused Products
<p>1[P]. A computer-implemented method comprising:</p>	<p>Google infringes directly and/or indirectly by performing, inducing others to perform, and/or contributing to the performance of: a computer-implemented method [of claim 1].</p> <p>The Accused Products meet the claim limitations by providing device-location tracking features such as those features described below. For example, the Accused Products meet the claim limitations because they are pre-installed with Android mobile operating systems containing code for providing device-location tracking features as provided in the claim limitations herein. For example, the Accused Products run and comprise applications and/or software that run within the Android mobile operating system and that include and utilize components of the Android mobile operating system to provide device-location tracking features (e.g. Google Maps, Find My Device (formerly Android Device Manager), Messages, Android Messenger, Hangouts, Google Plus, Google Latitude, Google Play Protect, and Google Chrome). Upon information and belief, in addition to the components and features of the Android mobile operating system itself, the following applications and/or software run within the Android mobile operating system and use components of the Android mobile operating system to provide device-location tracking features: Google Maps, Find My Device (formerly Android Device Manager), Messages, Android Messenger, Hangouts, Google Plus, Google Latitude, Google Play Protect, and Google Chrome.</p> <p>The Accused Products meet the claim limitations under at least two exemplary methods and/or systems, as shown below, which may be useable together or separately.</p> <p>Find My Device: Android Device Manager is the predecessor to Find My Device and has been available</p>

¹⁰ The construction of claim terms herein is consistent with the constructions in *AGIS Software Dev. LLC v. Huawei Device USA, Inc.*, No. 2:17-cv-00513-JRG, Dkt. No. 205 (Lead Case) (E.D. Tex. Oct. 10, 2018). AGIS reserves the right to update its constructions and contentions in view of this Court’s claim construction order.

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	<p>as a standard, pre-installed feature since 2013 and downloadable as a software application. The current iteration, Find My Device, often called the “new and improved Android Device Manager” or “rebranded Android Device Manager” is now part of the standard Google Play Protect suite which is “built in and enabled on all devices,” <i>i.e.</i>, the Accused Products running Android OS. Upon information and belief, the Find My Device method also uses and/or works in conjunction with functionalities associated with Google Maps, Google Messages, Android Messenger, Location Access, Google Chrome, and other features which come pre-installed on the Accused Products. For the purposes of avoiding needlessly presenting cumulative and duplicative evidence, AGIS sets forth the Find My Device feature of the Accused Products as representative of this first exemplary method. AGIS reserves the right to supplement these contentions in accordance with P.R. 3-1 and for any other reason for which it may deem necessary.</p> <p><i>See, e.g.</i>, https://www.androidcentral.com/find-my-device; https://support.google.com/android/answer/6160491?hl=en; https://android.googleblog.com/2013/08/find-your-lost-phone-with-android.html; https://play.google.com/store/apps/details?id=com.google.android.apps.adm&hl=en; https://www.blog.google/products/android/google-play-protect/</p> <p><u>Google Maps Share Location:</u> Share Location is currently included as a standard feature of the Accused Products operating (<i>e.g.</i> Google Maps). Google Maps is a pre-installed software application in Android OS. The Accused Products, and devices of the Accused Products, have included the Share Location functionalities since 2009 as part of Google Latitude which was an opt-in feature for Google Maps on Android OS-based mobile devices, such as the Accused Products. Share Location functionalities were briefly shifted from Latitude for Google Maps to Google Plus and Google Hangouts, until reappearing as a standard feature in Google Maps. Upon information and belief, the Share Location method also uses and/or works in conjunction with functionalities associated with Google Maps, Google Messages, Android Messenger, Location Access, Google Allo, Google Duo, Google Chrome, and other features which come pre-installed on the Accused Products. For the purposes of avoiding needlessly presenting cumulative and duplicative evidence, AGIS sets forth Google Maps’ Share Location feature of the Accused Products as representative of this second exemplary method. AGIS reserves the right to supplement these contentions to the extent that defendant requires additional information in accordance with P.R. 3-1 and for any other reason for which it may deem necessary.</p>

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	<p><code>public void getMapAsync (OnMapReadyCallback callback)</code></p> <p>Returns a non-null instance of the GoogleMap , ready to be used.</p> <p>Note that:</p> <ul style="list-style-type: none"> • This method must be called from the main thread. • The callback will be executed in the main thread. • In the case where Google Play services is not installed on the user's device, the callback will not be triggered until the user installs it. • The GoogleMap object provided by the callback is non-null. <p>Parameters</p> <table border="1" data-bbox="554 688 1761 753"> <tr> <td><code>callback</code></td> <td>The callback object that will be triggered when the map is ready to be used.</td> </tr> </table> <p><code>public final void onCreate (Bundle savedInstanceState)</code></p> <p>You must call this method from the parent Activity/Fragment's corresponding method.</p> <p>https://developers.google.com/android/reference/com/google/android/gms/maps/MapView</p>	<code>callback</code>	The callback object that will be triggered when the map is ready to be used.
<code>callback</code>	The callback object that will be triggered when the map is ready to be used.		
<p>[1H] and identifying user interaction with the interactive display selecting one or more of the second set of user-selectable symbols corresponding to one or more of the second devices and positioned on the second georeferenced map and</p>	<p>Google infringes directly and/or indirectly by performing, inducing others to perform, and/or contributing to the performance of: identifying user interaction with the interactive display selecting one or more of the second set of user-selectable symbols corresponding to one or more of the second devices and positioned on the second georeferenced map and user interaction with the display specifying an action and, based thereon, sending third data to the selected one or more second devices via the first server.</p> <p>The claimed step of identifying user interaction is performed by the hardware and event handling portions of the Android OS and other software executing on the (first) Accused Product which detect the symbol being touched by a user and reports that information to the application requesting the tracking.</p>		

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