

EXHIBIT 13

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

AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No. 2:22-cv-00263-JRG-RSP
	§	
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
	§	
v.	§	
	§	
SAMSUNG ELECTRONICS CO., LTD.,	§	
ET AL.,	§	
Defendants.	§	
	§	
	§	

**PLAINTIFF’S FIRST SET OF INTERROGATORIES TO
DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC. (NOS. 1-14)**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff AGIS Software Development LLC (“AGIS” or “Plaintiff”) hereby requests that Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung” or “Defendants”) respond to the following Interrogatories in writing, under oath, and in accordance with the following definitions and instructions, within thirty (30) days of the date of service thereof. These Interrogatories are continuing in nature and require supplementation in accordance with the Federal Rules of Civil Procedure.

DEFINITIONS

1. “AGIS,” “AGIS Software” and “Plaintiff” shall mean Plaintiff, AGIS Software Development LLC.
2. “Samsung,” “Defendant,” “Defendants,” “You,” and “Your” shall mean Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. including, without limitation, all predecessors-in-interest, successors in-interest, parents, subsidiaries,

affiliates, and all past or present officers, directors, trustees, employees, agents, consultants, attorneys, patent agents, entities acting in joint venture, licensing or partnership relationships with any of the defendants in any country.

3. The terms “Accused Functionality” and “Accused Functionalities” are defined as the features disclosed in the Complaint, representative infringement charts, and any amendments or supplements thereto.

4. “Accused Products” include any and all of Defendants’ products (including applications, services, devices, and servers) that implement the Accused Functionalities, including any such products that were released six years preceding the Complaint in this case and any such products that will be released on or before the date of trial in this Action. “Accused Products” includes any and all products identified in the Complaint, initial disclosures, infringement contentions, and any amendments and supplements thereto. “Accused Products” includes any and all products identified by Defendant in response to discovery requests, including these Interrogatories. For example, “Accused Products” includes Samsung Tactical and Samsung Knox services. For example, “Accused Products” includes but is not limited to each and every version of Samsung devices and servers running: Samsung Tactical, TAK, ATAK, and CivTAK, and Samsung Knox. For example, “Accused Products” includes but is not limited to the following devices running Samsung Tactical, TAK, ATAK, and CivTAK, and Samsung Knox: the Galaxy S20 Tactical Edition, Galaxy XCover FieldPro, Galaxy XCover Pro, GT-I7500 Galaxy, i5700 Galaxy Spica, Galaxy S, Galaxy SL, Galaxy S II, Galaxy S Advance, Galaxy S III, Galaxy S Duos, Galaxy S III Mini, Galaxy S II Plus, Galaxy S4, Galaxy S4 Active, Galaxy S4 Mini, Galaxy S4 Zoom, Galaxy S Duos 2, Galaxy S III Slim, Galaxy S5, Galaxy S III Neo, Galaxy S5 Active, Galaxy S5 Mini, Galaxy S Duos 3, Galaxy S5 Plus, Galaxy S6, Galaxy S6 Edge, Galaxy S5 Neo,

Galaxy S6 Active, Galaxy S6 Edge+, Galaxy S7, Galaxy S7 Edge, Galaxy S7 Active, Galaxy S8, Galaxy S8+, Galaxy S8 Active, Galaxy S9, Galaxy S9+, Galaxy S10e, Galaxy S10, Galaxy S10+, Galaxy S10 5G, Galaxy S21, Galaxy S20 FE, Galaxy Alpha, Galaxy A3, Galaxy A5, Galaxy A7, Galaxy A8, Galaxy A3, Galaxy A5, Galaxy A7, Galaxy A8, Galaxy A8+, Galaxy A6, Galaxy A6+, Galaxy A8 Star, Galaxy A7, Galaxy A9, Galaxy A6s, Galaxy A8s, Galaxy A30, Galaxy A50, Galaxy A10, Galaxy A20, Galaxy A40, Galaxy A70, Galaxy A20e, Galaxy A80, Galaxy A40s, Galaxy A60, Galaxy A10s, Galaxy A20s, Galaxy A10e, Galaxy C5, Galaxy C7, Galaxy C9, Galaxy C9 Pro, Galaxy C7 Pro, Galaxy C5, Pro, Galaxy C8, Galaxy J, Galaxy J1, Galaxy J5, Galaxy J7, Galaxy J2, Galaxy J1 Ace, Galaxy J1 Nxt, Galaxy J1 Mini, Galaxy J5 (2016), Galaxy J3 Pro, Galaxy J7, Galaxy J Max, Galaxy J1 Ace Neo, Galaxy J1 (2016), Galaxy J5 Prime, Galaxy J7, Prime, Galaxy J1 Mini Prime, Galaxy J2 Prime, Galaxy J3 Emerge, Galaxy J7 V, Galaxy J3 Prime, Galaxy J7 Pro, Galaxy J7 Max, Galaxy J7 Nxt, Galaxy J3 Luna Pro, Galaxy J7 Sky Pro, Galaxy J7+, Galaxy J2 Pro, Galaxy J7 Prime 2, Galaxy J7 Duo, Galaxy J4, Galaxy J6, Galaxy J3 (2018), Galaxy J7 (2018), Galaxy J2 Core, Galaxy J4+, Galaxy J6+, Galaxy J4 Core, Galaxy M, Galaxy M10, Galaxy M20, Galaxy M30, Galaxy M40, Galaxy E5, Galaxy E7, Galaxy Grand, Galaxy Core, Galaxy Core Plus, Galaxy Grand 2, Galaxy Grand Neo, Galaxy Core Prime, Galaxy Grand Prime Plus, Galaxy Grand Prime Pro, Galaxy Mega 5.8, Galaxy Mega 6.3, Galaxy Mega 2, Galaxy Mini, Galaxy Mini 2, Galaxy Trend, Galaxy Trend Lite, Galaxy Trend Plus, Galaxy Ace, Galaxy Ace Plus, Galaxy Ace 2, Galaxy Ace 3, Galaxy Ace Style, Galaxy Ace 4, Galaxy On7, Galaxy On5, Galaxy On5 Pro, Galaxy On7 Pro, Galaxy On8, Galaxy On Nxt, Galaxy On Max, Galaxy On7 Prime, Galaxy On6, Galaxy On8 (2018), Galaxy R, Galaxy R Style, Galaxy Y, Galaxy Y Duos, Galaxy Young, Galaxy Young 2, Galaxy Pocket, Galaxy Pocket Plus, Galaxy Pocket Neo, Galaxy Pocket Duos, Galaxy Pocket 2, Galaxy U, Galaxy Neo, Galaxy Pro, Galaxy

Precedent, Galaxy Z, Galaxy Rush, Galaxy S, Galaxy W, Galaxy Fit, Galaxy Gio, Galaxy Prevail, Galaxy Nexus, Galaxy Discover, Galaxy Reverb, Galaxy Stellar, Galaxy Appeal, Galaxy Express, Galaxy Express 2, Galaxy Fame, Galaxy Star, Galaxy Win, Galaxy Win Pro, Galaxy Star Pro, Galaxy Fame Lite, Galaxy Round, Galaxy Light, Galaxy V, Galaxy V Plus, Galaxy V2, Galaxy K Zoom, Galaxy Folder, Galaxy Active Neo, Galaxy Folder 2, Galaxy Fold, Galaxy Note, Galaxy Note II, Galaxy Note 3, Galaxy Note 4, Galaxy Note Edge, Galaxy Note 5, Galaxy Note 7, Galaxy Note Fan Edition, Galaxy Note 8, Galaxy Note 9, Galaxy Note 10, Galaxy Note 10+, Galaxy Note 10+ 5G, Galaxy Tab, Galaxy Tab 7.0, Galaxy Tab 10.1, Galaxy Tab 10.1N, Galaxy Tab 10.1v, Galaxy Tab 8.9, Galaxy Tab 7.0 Plus, Galaxy Tab 7.7, Galaxy Tab 2 7.0, Galaxy Tab 2 10.1, Galaxy Tab 3 7.0, Galaxy Tab 3 Lite 7.0, Galaxy Tab 3 8.0, Galaxy Tab 3 10.1, Galaxy Tab 4 7.0, Galaxy Tab 4 8.0, Galaxy Tab 4 10.1, Galaxy Tab Pro 8.4, Galaxy Tab Pro 10.1, Galaxy Tab Pro 12.2, Galaxy Tab S 8.4, Galaxy Tab S 10.5, Galaxy Tab S2 8.0, Galaxy Tab S2 9.7, Galaxy Tab S3 9.7, Galaxy Tab S4 10.5, Galaxy Tab E 8, Galaxy Tab E 9.6, Galaxy Tab A 8.0, Galaxy Tab A 9.7, Galaxy Tab A 6.0, Galaxy Tab A 7.0, Galaxy Tab A 10.1, Galaxy Tab A 10.5, Galaxy Tab Pro S 12.0, Galaxy Book 10.6, Galaxy Book 12.0, Galaxy Tab Active, Galaxy Tab Active 2, Galaxy View, Galaxy Note 8.0, Galaxy Note 10, Galaxy Note 10.1, Galaxy Note Pro 12.2, Galaxy Gear, Gear Sport, Gear S3 Frontier, Galaxy Watch, Galaxy Watch Active, and Galaxy Watch Active 2 from July 2016 to the present. For the avoidance of doubt, the term “Accused Products” does not include the Google Find My Device application, the Samsung Find My Mobile application, and the Google Maps Mobile application with Share Location feature.

5. “This Action” means *AGIS Software Dev. LLC v. Samsung Elecs. Co.*, Case No. 2:22-cv-00263-JRG-RSP (E.D. Tex.).

6. “’970 Patent” means U.S. Patent No. 8,213,970, entitled “Method of Utilizing

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.