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EXHIBIT D

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Based on information presently available, AGIS Software Development LLC ("AGIS") contends that Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Defendants" or "Samsung") infring "Asserted Claims") of U.S. Patent No. 8,213,970 (the "'970 Patent") through the Accused Products which an offered for sale, used, imported into the United States, and/or exported from the United States by Samsung.

The Accused Products comprise all versions of Samsung Tactical, TAK, ATAK, CivTAK, and Knox appl solutions, including all related servers and services. The Accused Products comprise the following devices: Galax Galaxy XCover FieldPro, Galaxy XCover Pro, GT-I7500 Galaxy, i5700 Galaxy Spica, Galaxy S, Galaxy SL, Advance, Galaxy S III, Galaxy S Duos, Galaxy S III Mini, Galaxy S II Plus, Galaxy S4, Galaxy S4 Active, Galaxy Zoom, Galaxy S Duos 2, Galaxy S III Slim, Galaxy S5, Galaxy S III Neo, Galaxy S5 Active, Galaxy S5 Mini, Ga S5 Plus, Galaxy S6, Galaxy S6 Edge, Galaxy S5 Neo, Galaxy S6 Active, Galaxy S6 Edge+, Galaxy S7, Galax Active, Galaxy S8, Galaxy S8+, Galaxy S8 Active, Galaxy S8 Lite, Galaxy S9, Galaxy S9+, Galaxy S10e, Galaxy S8 Galaxy S10 5G, Galaxy S20 5G, Galaxy S20 FE, Galaxy S20 FE 5G, Galaxy S20 Ultra, Galaxy S20+, Galaxy Galaxy S21 5G, Galaxy S21 FE 5G, Galaxy S21 Ultra, Galaxy S21 Ultra 5G, Galaxy S21+, Galaxy S21+ 5G, A3, Galaxy A5, Galaxy A7, Galaxy A8, Galaxy A3, Galaxy A5, Galaxy A8, Galaxy A8+, Galaxy A6, Galaxy Galaxy A9, Galaxy A6s, Galaxy A8s, Galaxy A30, Galaxy A50, Galaxy A10, Galaxy A20, Galaxy A40, Galaxy Galaxy A80, Galaxy A40s, Galaxy A60, Galaxy A10s, Galaxy A20s, Galaxy A10e, Galaxy C5, Galaxy C7, Gala Galaxy C7 Pro, Galaxy C5, Pro, Galaxy C8, Galaxy J, Galaxy J1, Galaxy J5, Galaxy J7, Galaxy J2, Galaxy J Galaxy J1 Mini, Galaxy J5 (2016), Galaxy J3 Pro, Galaxy J7, Galaxy J Max, Galaxy J1 Ace Neo, Galaxy J1 (20 Galaxy J7, Prime, Galaxy J1 Mini Prime, Galaxy J2 Prime, Galaxy J3 Emerge, Galax y J7 V, Galaxy J3 Prime, J7 Max, Galaxy J7 Nxt, Galaxy J3 Luna Pro, Galaxy J7 Sky Pro, Galaxy J7+, Galaxy J2 Pro, Galaxy J7 Prime 2, G J4, Galaxy J6, Galaxy J3 (2018), Galaxy J7 (2018), Galaxy J2 Core, Galaxy J4+, Galaxy J6+, Galaxy J4 Core, G Galaxy M20, Galaxy M30, Galaxy M40, Galaxy E5, Galaxy E7, Galaxy Grand, Galaxy Core, Galaxy Core I Galaxy Grand Neo, Galaxy Core Prime, Galaxy Grand Prime Plus, Galaxy Grand Prime Pro, Galaxy Mega Galaxy Mega 2, Galaxy Mini, Galaxy Mini 2, Galaxy Trend, Galaxy Trend Lite, Galaxy Trend Plus, Galaxy A Galaxy Ace 2, Galaxy Ace 3, Galaxy Ace Style, Galaxy Ace 4, Galaxy On7, Galaxy On5, Galaxy On5 Pro, Ga On8, Galaxy On Nxt, Galaxy On Max, Galaxy On7 Prime, Galaxy On6, Galaxy On8 (2018), Galaxy R, Galaxy Galaxy Y Duos, Galaxy Young, Galaxy Young 2, Galaxy Pocket, Galaxy Pocket Plus, Galaxy Pocket Neo, Galax Pocket 2, Galaxy U, Galaxy Neo, Galaxy Pro, Galaxy Precedent, Galaxy Z, Galaxy Rush, Galaxy 5, Galaxy W, G Galaxy Prevail, Galaxy Nexus, Galaxy Discover, Galaxy Reverb, Galaxy Stellar, Galaxy Appeal, Galaxy Expression Galaxy Fame, Galaxy Star, Galaxy Win, Galaxy Win Pro, Galaxy Star Pro, Galaxy Fame Lite, Galaxy Round, Galax Galaxy V Plus, Galaxy V2, Galaxy K Zoom, Galaxy Folder, Galaxy Active Neo, Galaxy Folder 2, Galaxy Fold Note II, Galaxy Note 3, Galaxy Note 4, Galaxy Note Edge, Galaxy Note 5, Galaxy Note 7, Galaxy Note Fan E Galaxy Note 9, Galaxy Note 10, Galaxy Note 10+, Galaxy Note 10+ 5G, Galaxy Tab, Galaxy Tab 7.0, Galaxy

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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 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 T 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. 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 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 H Active, Galaxy Tab Active 2, Galaxy View, Galaxy Note 8.0, Galaxy Note 10.1, Galaxy Note Pro 12.2, Galaxy G S3 Frontier, Galaxy Watch, Galaxy Watch Active, Galaxy Watch Active2, Galaxy Watch3, Gear S3 Classic, Classic, Gear S2, Gear S2 Classic, Galaxy A04s, Galaxy A12, Galaxy A13, Galaxy A13 5G, Galaxy A21, Gala Galaxy A22e 5G, Galaxy A23, Galaxy A23 5G, Galaxy A31, Galaxy A32, Galaxy A32 5G, Galaxy A33, Galaxy Galaxy A42, Galaxy A42 5G, Galaxy A51, Galaxy A51 5G, Galaxy A52, Galaxy A52 5G, Galaxy A52s 5G, G A71, Galaxy A71 5G, Galaxy A72, Galaxy A73 5G, Galaxy A82 5G, Galaxy A90 5G, Galaxy F12, Galaxy F12 F62, Galaxy Fold, Galaxy Fold 5G, Galaxy M12, Galaxy M13, Galaxy M13 5G, Galaxy M22, Galaxy M23 5G, M32, Galaxy M32 5G, Galaxy M33 5G, Galaxy M42 5G, Galaxy M51, Galaxy M52 5G, Galaxy M53 5G, Galaxy 5G, Galaxy Note10 Lite, Galaxy Note20, Galaxy Note20 5G, Galaxy Note20 Ultra 5G, Galaxy Note20 Ultra 5G S22 Ultra, Galaxy S22+, Galaxy Tab Active3, Galaxy Tab Active4 Pro, Galaxy Tab Motor, Galaxy Tab S6, Gala Tab S6 Lite, Galaxy Tab S7, Galaxy Tab S7 FE, Galaxy Tab S7 FE 5G, Galaxy Tab S7+, Galaxy Tab S8 Ultra, G XCover 5, Galaxy XCover 6 Pro, Galaxy XCover Pro, Galaxy Z Flip, Galaxy Z Flip 5G, Galaxy Z Flip3 5G, Galaxy Flip4 5G, Galaxy Z Fold2, Galaxy Z Fold2 5G, Galaxy Z Fold3 5G, Galaxy Z Fold3 5G, Galaxy Z Fold4, Gal 5G, W21 5G, W22 5G, Galaxy Tab Active Pro, Galaxy XCover 4s, Galaxy A50s, Galaxy A70s, Galaxy Haechi, Tab A 8, Galaxy Tab A 8 Plus, Galaxy Tab A 8.4 (2020), Galaxy Tab A Plus 8" (2019), Galaxy Tab A7, Galaxy Tab A8, Galaxy Tab S7 FE, Galaxy A01, Galaxy A02, Galaxy A02s, Galaxy A03, Galaxy A03 Core, Galaxy A03 A11, Galaxy F42 5G, Galaxy F52 5G, Galaxy M11, Galaxy M21, Galaxy M21 (2021), Galaxy M30s, Galaxy M3 Pro, Gear Fit2 Pro, Watch4 40mm, Watch4 44mm, Watch4 Classic 42mm, Watch4 Classic 46mm, Watch5 4 Watch5 Pro, Galaxy A9 Pro, Galaxy J7 Pop, Galaxy J8, W2019, Galaxy Note9, Galaxy J3 Top, Galaxy J7 Top, C Galaxy Tab A 8.0", Galaxy J7 Neo, Galaxy Note FE, Galaxy On7 (2018), Galaxy XCover4, W2018, Galaxy Not Plus (2016), Galaxy Tab A 10.1" w/ S-Pen, Galaxy Tab A 8 (2017), Galaxy Tab E 8.0", Galaxy View2, Galaxy (2017), Galaxy A5 (2017), Galaxy A7 (2017), Galaxy A8 (2016), Galaxy A9 Pro (2016), Galaxy C5, Galaxy C5 P C7 Pro, Galaxy C9 Pro, Galaxy On5 (2016), Galaxy On7 (2016), Galaxy Tab4 7, Galaxy A5 (2015), Galaxy A (2016), Galaxy J2 (2018), Galaxy J3 (2016), and Galaxy J5 (2016), which are made up of applications, services made, used, sold, offered for sale, imported into the United States, and/or exported from the United States or ot September 21, 2004. AGIS reserves the right to amend this list of Accused Products as discovery progresses.

Samsung directly infringes each of the Asserted Claims by using, importing, testing, selling, offering for s United States, and/or exporting from the United States the Accused Products in violation of 35 U.S.C. § 271(a).

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Samsung indirectly infringes the Asserted Claims in violation of 35 U.S.C. § 271(b) by inducing third part and/or customers, to directly infringe through its operation and use of the Accused Products. Samsung has known induced this direct infringement by, *inter alia*, (i) selling, offering to sell, importing, exporting, or otherwise p Products to third parties with the intent that the Accused Products will be operated and used in a manner that Claims; and (ii) marketing and advertising the Accused Products. Samsung's marketing and promotional mat Products are found, for example, on Samsung's website, and in App stores of operating systems for which the made available. For example, Samsung's website offers customers downloadable User Manuals for the Accused customers to, among other things, use the accused services in the Accused Products. Samsung's website also offers including instruction to, among other things, use the Accused Products to share location information with information and belief, Samsung knows that its actions will result in infringement of the Asserted Claims, or sub there is a high probability that its actions will result in infringement of the Asserted Claims but has taken delib learning these facts.

Samsung also contributorily infringes each of the Asserted Claims in violation of 35 U.S.C. § 271(c) offering for sale, and otherwise providing the Accused Products which, when used, directly infringe the Asserted Products constitute a material part of the Asserted Claims.

On information and belief, the charted versions of the Accused Products are representative of all ver Products, including but not limited to all variants of the Accused Products made, sold, offered for sale, or used Android, iOS, Symbian, Blackberry, and Windows Mobile operating systems.

AGIS does not concede that any claims of the '970 Patent that are not listed below are not infringed by Products. Moreover, the citations to certain documents and other information below are intended to be exempla foreclose AGIS from citing or relying on additional documents, information, source code, and/or testimony contentions are preliminary in nature, and an analysis of Samsung's products, internal documentation, source of from relevant witnesses may more fully and accurately describe the infringing features of its Accused Product reserves the right to supplement, correct, modify, and/or amend these contentions once such additional information AGIS. Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as progresses; in view of the Court's claim construction order(s); in view of any positions taken by Samsung include

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positions on claim construction,¹ invalidity, and/or non-infringement; and in connection with the preparation a reports.

The contents of every below claim cell on which another claim cell depends are expressly incorporate dependent cell, as if set forth in their entirety therein.

¹ The construction of claim terms herein is consistent with the constructions in *AGIS Software Dev. LLC v. Hua* No. 2:17-cv-00513-JRG, Dkt. No. 205 (Lead Case) (E.D. Tex. Oct. 10, 2018) and *AGIS Software Dev. LLC v. G* cv-00361-JRG, Dkt. No. 147 (Lead Case) (E.D. Tex. Dec. 20, 2020). AGIS reserves the right to update its construction order.

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