

EXHIBIT G

Exhibit D2 – Claim Chart for U.S. Patent No. 9,467,838 Against Samsung Accused

Based on information presently available, AGIS Software Development LLC (“AGIS”) contends that Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”) infringe claims 19, 24, 37, 54, 55 and 84 (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, used, imported into the United States, and/or exported from the United States by Samsung. The Accused Products include Samsung Android-based devices comprising and/or running Find My Device and services.

The Accused Products include Samsung products comprising and/or running Find My Device, an application installed on Samsung devices with Android operating systems located on each Samsung Android-based device. The Accused Products are not limited to, the following Samsung products: Galaxy S22+, Galaxy S20 Tactical Edition, Galaxy XCover Pro, Galaxy XCover Pro, GT-I7500 Galaxy, i5700 Galaxy Spica, Galaxy S, Galaxy SL, Galaxy S II, Galaxy S Advance, Galaxy S Duos, Galaxy S III Mini, Galaxy S II Plus, Galaxy S4, Galaxy S4 Active, Galaxy S4 Mini, Galaxy S4 Zoom, Galaxy S III Slim, Galaxy S5, Galaxy S III Neo, Galaxy S5 Active, Galaxy S5 Mini, Galaxy S Duos 3, Galaxy S5 Plus, Galaxy S Edge, Galaxy S5 Neo, Galaxy S6 Active, Galaxy S6 Edge+, Galaxy S7, Galaxy S7 Edge, Galaxy S7 Active, Galaxy S8, Galaxy S8 Active, Galaxy S9, Galaxy S9+, Galaxy S10e, Galaxy S10, Galaxy S10+, Galaxy S10 5G, Galaxy S21, Galaxy Alpha, Galaxy A3, Galaxy A5, Galaxy A7, Galaxy A8, Galaxy A3, Galaxy A5, Galaxy A7, Galaxy A8, Galaxy A6, Galaxy A6+, Galaxy A8 Star, Galaxy A7, Galaxy A9, Galaxy A6s, Galaxy A8s, Galaxy A30, Galaxy A50, Galaxy A20, Galaxy A40, Galaxy A70, Galaxy A20e, Galaxy A80, Galaxy A40s, Galaxy A60, Galaxy A10s, Galaxy A12, Galaxy C5, Galaxy C7, Galaxy C9, Galaxy C9 Pro, Galaxy C7 Pro, Galaxy C5, Pro, Galaxy C8, Galaxy J, Galaxy J7, Galaxy J2, Galaxy J1 Ace, Galaxy J1 Nxt, Galaxy J1 Mini, Galaxy J5 (2016), Galaxy J3 Pro, Galaxy J7, Galaxy J7 Ace Neo, Galaxy J1 (2016), Galaxy J5 Prime, Galaxy J7, Prime, Galaxy J1 Mini Prime, Galaxy J2 Prime, 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 Pro, Galaxy J7 Prime 2, Galaxy J7 Duo, Galaxy J4, Galaxy J6, Galaxy J3 (2018), Galaxy J7 (2018), Galaxy J2 Core, Galaxy J6+, Galaxy J4 Core, Galaxy M, Galaxy M10, Galaxy M20, Galaxy M30, Galaxy M40, Galaxy E5, Galaxy E7, Galaxy E8, Galaxy Core, Galaxy Core Plus, Galaxy Grand 2, Galaxy Grand Neo, Galaxy Core Prime, Galaxy Grand Prime Plus, Galaxy Mega 5.8, Galaxy Mega 6.3, Galaxy Mega 2, Galaxy Mini, Galaxy Mini 2, Galaxy Trend, Galaxy Trend Plus, Galaxy Ace, Galaxy Ace Plus, Galaxy Ace 2, Galaxy Ace 3, Galaxy Ace Style, Galaxy Ace 4, Galaxy On7, Galaxy On5 Pro, Galaxy On7 Pro, Galaxy On8, Galaxy On Nxt, Galaxy On Max, Galaxy On7 Prime, Galaxy On6, Galaxy R, Galaxy R Style, Galaxy Y, Galaxy Y Duos, Galaxy Young, Galaxy Young 2, Galaxy Pocket, Galaxy Pocket Neo, Galaxy Pocket Duos, Galaxy Pocket 2, Galaxy U, Galaxy Neo, Galaxy Pro, Galaxy Precedent, Galaxy Z, Galaxy W, Galaxy Fit, Galaxy Gio, Galaxy Prevail, Galaxy Nexus, Galaxy Discover, Galaxy Reverb, Galaxy S, Galaxy Express, Galaxy Express 2, Galaxy Fame, Galaxy Star, Galaxy Win, Galaxy Win Pro, Galaxy Star Pro, Galaxy Round, Galaxy Light, Galaxy V, Galaxy V Plus, Galaxy V2, Galaxy K Zoom, Galaxy Folder, Galaxy Active

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2, Galaxy Fold, Galaxy Note, Galaxy Note II, Galaxy Note 3, Galaxy Note 4, Galaxy Note Edge, Galaxy Note 5, Galaxy Note Fan Edition, Galaxy Note 8, Galaxy Note 9, Galaxy Note 10, Galaxy Note 10+, Galaxy Note 10+ 5G, Galaxy Note 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 4 10.1, 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 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 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 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 12.2, Galaxy Book 12.0, Galaxy Tab Active, Galaxy Tab Active 2, Galaxy View, Galaxy Note 8.0, Galaxy Note 10, Galaxy Note Pro 12.2, Galaxy Gear, Gear Sport, Gear S3 Frontier, Galaxy Watch, Galaxy Watch Active, and Galaxy Watch 4.

The Accused Products comprise the following versions (and all intervening updates and sub-versions) of operating systems: Android 1.5 (Cupcake); Android 1.6 (Donut); Android 2.0 (Éclair); Android 2.2 (Froyo); 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 12L; Android 13; Android One; Android Go; and any variants thereof, imported with the aforementioned Samsung products after 2016.

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

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

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

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

AGIS does not concede that any claims of the '838 Patent that are not listed below are not infringed by the Accused Products. Moreover, the citations to certain documents and other information below are intended to be exemplary and not to foreclose AGIS from citing or relying on additional documents, information, source code, and/or testimony. AGIS's contentions are preliminary in nature, and an analysis of Samsung's products, internal documentation, source code, and testimony from relevant witnesses may more fully and accurately describe the infringing features of its Accused Products. AGIS reserves the right to supplement, correct, modify, and/or amend these contentions once such additional information is received. AGIS. Furthermore, AGIS reserves the right to supplement, correct, modify, and/or amend these contentions as the litigation progresses; in view of the Court's claim construction order(s); in view of any positions taken by Samsung including its positions on claim construction,¹ invalidity, and/or non-infringement; and in connection with the preparation and filing of reports.

The contents of every below claim cell on which another claim cell depends are expressly incorporated into the 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. Huawei*, No. 2:17-cv-00513-JRG, Dkt. No. 205 (Lead Case) (E.D. Tex. Oct. 10, 2018) and *AGIS Software Dev. LLC v. Google*, No. 2:17-cv-00361-JRG, Dkt. No. 147 (Lead Case) (E.D. Tex. Dec. 20, 2020). AGIS reserves the right to update its constructions in view of this Court's claim construction order.

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Claim – 9,467,838	Exemplary Supporting Evidence Regarding Accused Products
<p>1[P]. A computer-implemented method comprising:</p>	<p>Samsung infringes directly and/or indirectly by performing, inducing others to perform, or causing to be performed, the operations of claim 1 to the performance of a computer-implemented method comprising: performing by a first device:</p> <p>The Accused Products meet the claim limitations by providing device-location tracking and location-based services, including those features described below. For example, the Accused Products meet the claim limitations because they include Find My Device and related services. The Find My Device application is provided on the Accused Products with built-in services accessible through Settings and the Find My Device application. Find My Device.</p> <p>Android Device Manager is the predecessor to Find My Device and has been available on Android devices since 2013 and downloadable as a software application. <i>See</i> https://www.androidpolice.com/2017/05/17/android-device-manager-updated-first-time-renamed-find-device-apk-download/. The current iteration, Find My Device, often referred to as “rebranded Android Device Manager” or “rebranded Android Device Manager” is not part of the Google Play Protect suite which is “built in and enabled on all devices,” i.e., the Accused Products’ Android OS. <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/2017/05/17/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>Further, to the extent this element is performed at least in part by Defendants’ software, Defendants reserve the right to supplement these contentions pursuant to production of such software and to the extent Defendants require additional information in accordance with P.R. 37.2(b), Defendants reserve the right to do so for any reasons.</p>
<p>[1A] performing, by a first device:</p>	<p>Samsung infringes directly and/or indirectly by performing, inducing others to perform, or causing to be performed, the operations of claim 1 to the performance, by a first device [the operations of claim 1].</p>

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