EXHIBIT 2

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

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AGIS SOFTWARE DEVELOPMEN	NT, §
LLC,	§
	§
Plaintiff,	§ Case No. 2:17-cv-517
	§
v.	§ JURY TRIAL DEMANDED
	§
ZTE CORPORATION AND	§
ZTE (TX), INC.,	§
	§
Defendants.	§
	8

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, AGIS Software Development LLC ("AGIS Software" or "Plaintiff") files this Original Complaint against Defendants ZTE Corporation and ZTE (TX), Inc. (collectively, "Defendants" or "ZTE") for patent infringement under 35 U.S.C. § 271 and alleges as follows:

THE PARTIES

1. Plaintiff, AGIS Software, is a limited liability company organized and existing under the laws of the State of Texas, and maintains its principal place of business at 100 W. Houston Street, Marshall, Texas 75670. AGIS Software is the owner of all right, title, and interest in and to U.S. Patent Nos. 9,467,838, 9,445,251, 9,408,055, and 8,213,970 (collectively, the "patents-in-suit").

2. Upon information and belief, ZTE Corporation is a Chinese corporation with its principal place of business at ZTE Plaza, Keji Road South, Hi-Tech Industrial Park, Nanshan District, Shenzhen, Guangdong Province, People's Republic of China 518057. Upon information and belief, ZTE Corporation does business in Texas, directly or through

PATENTS-IN-SUIT

7. On July 3, 2012, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,213,970 (the "970 Patent") entitled "Method of Utilizing Forced Alerts for Interactive Remote Communications." A true and correct copy of the '970 Patent is attached hereto as Exhibit A.

8. On August 2, 2016, the United States Patent and Trademark Office duly and
legally issued U.S. Patent No. 9,408,055 (the "055 Patent") entitled "Method to Provide Ad Hoc
and Password Protected Digital and Voice Networks." A true and correct copy of the '055
Patent is attached hereto as Exhibit B.

9. On September 13, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,445,251 (the "251 Patent") entitled "Method to Provide Ad Hoc and Password Protected Digital and Voice Networks." A true and correct copy of the 251 Patent is attached hereto as Exhibit C.

10. On October 11, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,467,838 (the "'838 Patent") entitled "Method to Provide Ad Hoc and Password Protected Digital and Voice Networks." A true and correct copy of the '838 Patent is attached hereto as Exhibit D.

FACTUAL ALLEGATIONS

11. Malcolm K. "Cap" Beyer, Jr., a graduate of the United States Naval Academy and a former U.S. Marine, is the CEO of AGIS Software and a named inventor of the AGIS patent portfolio. Mr. Beyer founded Advanced Ground Information Systems, Inc. ("AGIS, Inc.") shortly after the September 11, 2001 terrorist attacks because he believed that many firstresponder and civilian lives could have been saved through the implementation of a better importing into the United States the infringing Accused Devices, and by instructing users of the Accused Devices to perform methods claimed in the '970 Patent. For example, Defendants, with knowledge that the Accused Devices infringe the '970 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continue to actively, knowingly, and intentionally induced in violation of 35 U.S.C. § 271(b).

21. For example, Defendants have indirectly infringed and continue to indirectly infringe at least claim 6 of the '970 Patent in the United States because Defendants' customers use such devices, including at least the Android Device Manager, Find My Device, Google Maps, Google Messages, Android Messenger, Google Hangouts, Google Plus, and Google Latitude apps installed on the Accused Devices, in accordance with Defendants' instructions and thereby directly infringe at least claim 6 of the '970 Patent in violation of 35 U.S.C. § 271. For example, ZTE directly and/or indirectly intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installations and/or user guides such as those located at one or more of the following: www.ztedevice.com, www.zteusa.com, http://devicehelp.boostmobile.com/document/HowToSetupGuide/Tempo/Boost_Mobile/en/Use_ Android_Device_Manager_with_your_ZTE_Tempo, and ZTE agents and representatives located within this judicial district. Defendants are thereby liable for infringement of the '970 Patent under 35 U.S.C. § 271(b).

22. For example, ZTE directly and/or indirectly instructs its customers to infringe through pre-installed applications in the exemplary Accused Devices as shown below.

56. For example, Defendants have indirectly infringed and continue to indirectly infringe at least claim 54 of the '838 Patent in the United States because Defendants' customers use such devices, including at least the Android Device Manager, Find My Device, Google Maps, Google Messages, Android Messenger, Google Hangouts, Google Plus, and Google Latitude apps installed on the Accused Devices, in accordance with Defendants' instructions and thereby directly infringe at least one claim of the '838 Patent in violation of 35 U.S.C. § 271. Defendants directly and/or indirectly intentionally instruct their customers to infringe through training videos, demonstrations, brochures, installations and/or user guides, such as those located at one or more of the following: www.ztedevice.com, www.zteusa.com, and ZTE agents and representatives located within this judicial district. Defendants are thereby liable for infringement of the '838 Patent under 35 U.S.C. § 271(b).

57. For example, Defendants' Accused Devices are pre-installed with at least the Google Maps app which allows users to share their location, view other users' locations on a map, and to communicate with those users via the Google Maps app (as shown below), which is integrated with Google Messages or Android Messenger and which is also pre-installed on the Accused Devices.

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