EXHIBIT 3

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

AGIS SOFTWARE DEVELOPMENT LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 2:22-cv-00263-JRG-RSP JURY TRIAL DEMANDED

DECLARATION OF TIM A. WILLIAMS, PH.D. REGARDING CLAIM CONSTRUCTION

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I.   INTRODUCTION AND ENGAGEMENT

1.   I have been retained as a technical expert in the above-captioned cases by Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung"). I understand AGIS Software Development LLC ("AGIS") asserts that Samsung infringes certain claims of U.S. Patent No. 8,213,970 ("the '970 Patent"), U.S. Patent No. 9,467,838 ("the '838 Patent"), U.S. Patent No. 9,749,829 ("the '829 Patent"), and U.S. Patent No. 9,820,123 ("the '123 Patent") (collectively the "Patents-in-Suit").

2.   I have been asked to analyze and provide opinions on the scope and meaning that a person of ordinary skill in the art ("POSA") would have given to certain terms and phrases in the claims of the Patents-in-Suit at the time of the alleged invention, a process that is referred to as claim construction.

3.   The opinions that I provide herein relate to the '970 patent. In rendering my opinions, I have reviewed the claims and specifications of the '970 patent, its prosecution history, claim constructions provided by Samsung and AGIS, AGIS's P.R. 3-1 Infringement Contentions and Samsung's P.R. 3-3 Invalidity Contentions of the '970 patent. My opinions are based on my years of education, training, teaching, and experience in the relevant art.

4.   I am being compensated at a rate of $895 per hour for my work on this case. My compensation is not dependent upon my opinions or testimony, or the outcome of this case.

II.   BACKGROUND AND QUALIFICATIONS

5.   My background and qualifications as a technical expert for this matter are summarized below. A copy of my CV is attached as Exhibit A.

6.   I hold degrees from Michigan Technological University (Bachelor of Science in Electrical Engineering, 1976) and the University of Texas at Austin (Master of Science in

Electrical Engineering, 1982; Ph.D. in Electrical Engineering, 1985; and Master of Business Administration, 1991). I have also been a Registered Patent Agent with the U.S. Patent and Trademark Office ("the USPTO") since 2002.

7.   I am an industry professional with over 45 years of experience in wireless communications, computer networking and telecommunications technology.

8.   I am currently active as Chief Executive Officer at Beach Technologies, LLC (Danville, CA), a company related to intellectual property consulting.

9.   I am also currently active as a Member at Calumet Venture Management (Madison, WI), a company related to the investment into start-up companies.

10.   Beginning in 2004, I was the Founder and Chairman at DoceoTech Inc. (Danville, CA), which provides training for engineers in wireless, computer networking, and telephony technologies.

11.   From 2008 to 2010, I was a Founder and Board Member of BitRail Networks, Inc (Miami, FL). This company designed and produced computer networking equipment. One market the company served was edge devices for residential and community access.

12.   From 2006 to 2015, I was a Founder and Board Member of BEEcube, Inc. (Freemont, CA). This company built high-speed computing and computer networking equipment. One market the company served was networking equipment for backhaul networks used in 5G cellular networks.

13.   From 2004 to 2008, I was the Founder and CEO of SiBEAM, Inc. This company designed and produced wireless networking IC and equipment.

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