

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

AGIS SOFTWARE DEVELOPMENT LLC,	§	Case No. 6:24-cv-00433
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
v.	§	
SNAP INC.,	§	
Defendant.	§	
	§	
	§	

PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff AGIS Software Development LLC (“AGIS Software” or “Plaintiff”) files this Complaint against Defendant Snap Inc. (“Snap” or “Defendant”) 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. 9,445,251, 9,467,838, 9,820,123, and 9,749,829 (the “Patents-in-Suit”).

2. On information and belief, Defendant Snap is a corporation organized and existing under the laws of the State of Delaware and maintains a place of business at 405 Colorado Street, Austin, Texas 78701. Defendant is registered to conduct business in the State of Texas and has a registered agent at Corporation Service Company DBA CSC – Lawyers Inco at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

3. On information and belief, Defendant directly and/or indirectly develops, designs, manufactures, distributes, markets, offers for sale, and/or sells infringing products and services in the United States, including in the Western District of Texas, and otherwise directs infringing activities to this District in connection with its products and services.

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1338(a), and 1367.

5. This Court has specific and personal jurisdiction over Defendant in this action because Defendant has committed acts within this Judicial District giving rise to this action and has established minimum contacts with this forum, such that the exercise of jurisdiction over Defendant would not offend traditional notions of fair play and substantial justice. Defendant conducts business and has committed acts of patent infringement and/or has induced acts of patent infringement by others in this Judicial District and/or has contributed to patent infringement by others in this Judicial District, the State of Texas, and elsewhere in the United States by, among other things, offering to sell and selling products and/or services that infringe the Patents-in-Suit.

6. Venue is proper in this Judicial District pursuant to 28 U.S.C. §§ 1391 and 1400(b) because Defendant has regular and established places of business in this Judicial District. Defendant, through its own acts and/or through the acts of others, makes, uses, sells, distributes, exports from, imports, and/or offers to sell infringing products within this Judicial District, regularly does and solicits business in this Judicial District, and has the requisite minimum contacts with this Judicial District, such that this venue is a fair and reasonable one.

PATENTS-IN-SUIT

7. 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.” On June 8, 2021, the United States Patent and Trademark Office issued an Ex Parte Reexamination Certificate of the ’251 Patent determining claims 1-35 to be valid and patentable. A true and correct copy of the ’251 Patent, which includes the June 8, 2021 Ex Parte Reexamination Certificate, is attached hereto at Exhibit A.

8. 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.” On May 27, 2021, the United States Patent and Trademark Office issued an Ex Parte Reexamination Certificate of the ’838 Patent determining claims 1-84 to be valid and patentable. A true and correct copy of the ’838 Patent, which includes the May 27, 2021 Ex Parte Reexamination Certificate, is attached hereto at Exhibit B.

9. On November 14, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,820,123 (the “’123 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” On September 24, 2021, the United States Patent and Trademark Office issued an Ex Parte Reexamination Certificate for the ’123 Patent confirming the validity and patentability of claims 1-48. A true and correct copy of the ’123 Patent, which includes the September 24, 2021 Ex Parte Reexamination Certificate, is attached hereto as Exhibit C.

10. On August 29, 2017, the United States and Trademark Office duly and legally issued U.S. Patent No. 9,749,829 (the “’829 Patent”) entitled “Method to Provide Ad Hoc and Password Protected Digital and Voice Networks.” On August 16, 2021, the United States Patent

and Trademark Office issued an Ex Parte Reexamination Certificate for the '829 Patent confirming the validity and patentability of claims 1-68. A true and correct copy of the '829 Patent, which includes the August 16, 2021 Ex Parte Reexamination Certificate, is attached hereto as Exhibit D.

11. AGIS Software is the sole and exclusive owner of all rights, title, and interest in the Patents-in-Suit, and holds the exclusive right to take all actions necessary to enforce its rights to the Patents-in-Suit, including the filing of this patent infringement lawsuit. AGIS Software also has the right to recover all damages for past, present, and future infringement of the Patents-in-Suit and to seek injunctive relief as appropriate under the law.

FACTUAL ALLEGATIONS

12. 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 Software 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 first responder and civilian lives could have been saved through the implementation of a better communication system. He envisioned and developed a new communication system that would use integrated software and hardware components on mobile devices to give users situational awareness superior to systems provided by conventional military and first responder radio systems.

13. AGIS, Inc. developed prototypes that matured into its LifeRing system. LifeRing provides first responders, law enforcement, and military personnel with what is essentially a tactical operations center built into hand-held mobile devices. Using GPS-based location technology and existing or special-purpose cellular communication networks, LifeRing users can exchange location, heading, speed, and other information with other members of a group, view

each other's locations on maps and satellite images, and rapidly communicate and coordinate their efforts.

14. AGIS Software was formed in 2017 and has since opened two offices in Texas, including one office located at 2226 Washington Avenue, #2, Waco, Texas 76702. AGIS Software also maintains a data center in Texas.

15. Mr. Beyer has maintained longstanding ties to Texas and the Western District. In 1987, Mr. Beyer founded Advanced Programming Concepts, an Austin-based company focused on real-time tactical command and control systems. Advanced Programming Concepts was later acquired by Ultra Electronics, Inc. and is now the Advanced Tactical Systems unit of Ultra Electronics, Inc., which is still based in Austin, Texas.

16. AGIS Software licenses its patent portfolio, including the '251, '838, '123, and '829 Patents, to AGIS, Inc. AGIS, Inc. has marked its products accordingly. AGIS Software and all previous assignees of the Patents-in-Suit have complied with the requirements of 35 U.S.C. § 287(a).

17. Defendant has infringed and is continuing to infringe the Patents-in-Suit by making, using, selling, offering to sell, distributing, exporting from, and/or importing, and by actively inducing others to make, use, sell, offer to sell, distribute, export from, and/or import products that infringe the Patents-in-Suit. Such products include at least the Snapchat application (the "Accused Products").¹ The Accused Products infringe each of the Asserted Patents.

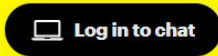
18. The Accused Products include functionalities that allow users to form and/or join networks or groups, share and view locations with other users, display symbols corresponding to locations (including locations of other users) on a map, and communicate with other users via text,

¹ See, e.g., <https://www.snapchat.com/download>

voice, and multimedia-based communication. Additionally, the Accused Products include functionalities to allow users to form and/or join networks or groups. The Accused Products include the functionalities to display map information, including symbols corresponding with users, entities, and locations. Additionally, the Accused Products include functionalities to form groups that include their own devices in order to track and/or communicate with other users' devices. The Accused Products practice the claims of the Asserted Patents to improve user experiences and to improve Defendant's position in the market.

Get Snapchat for any device

An adventure awaits. Hang out with your friends on our desktop app and keep the conversation going on mobile.

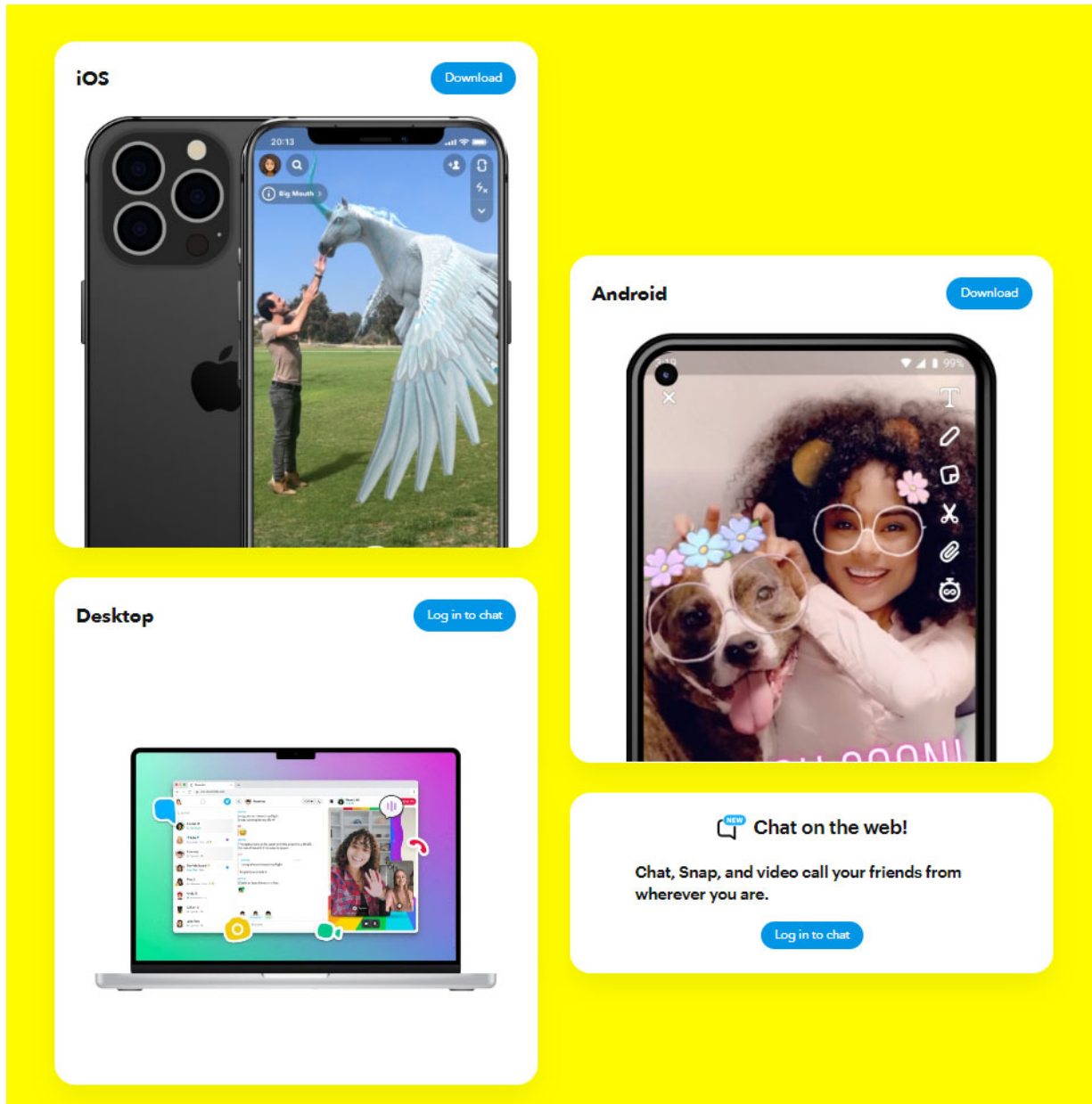


or



2

² <https://www.snapchat.com/download>



COUNT I
(Infringement of the '251 Patent)

19. Paragraphs 1 through 18 are incorporated herein by reference as if fully set forth in their entireties.

³ <https://www.snapchat.com/download>

20. AGIS Software has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, distribute, export from, or import any Accused Products and/or products that embody the inventions of the '251 Patent.

21. Defendant infringes, contributes to the infringement of, and/or induces infringement of the '251 Patent by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States products and/or methods covered by one or more claims of the '251 Patent including, but not limited to, the Accused Products.

22. Defendant has and continues to directly infringe at least claim 24 of the '251 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

23. Defendant has and continues to indirectly infringe at least claim 24 of the '251 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products and by instructing users of the Accused Products to perform methods claimed in the '251 Patent. For example, Defendant, with knowledge that the Accused Products infringe the '251 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce direct infringement of the '251 Patent. Alternatively, Defendant believed there was a high probability that others would infringe the '251 Patent but remained willfully blind to the infringing nature of others' actions.

24. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 24 of the '251 Patent in the United States because Defendant's customers use the

Accused Products, including at least the Snapchat application and/or services or the Accused Products with the Snapchat application and/or services, alone or in conjunction with additional Accused Products, in accordance with Defendant's instructions and thereby directly infringe at least claim 24 of the '251 Patent in violation of 35 U.S.C. § 271. Defendant 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: <https://www.snapchat.com/download>; <https://help.snapchat.com/hc/en-us>; and Defendant's agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '251 Patent under 35 U.S.C. § 271(b). Alternatively, Defendant believed there was a high probability that others would infringe the '251 Patent but remained willfully blind to the infringing nature of others' actions.

25. For example, Defendant's Accused Products allow users to share their locations and view other users' locations on a map and to communicate with those users via the Snapchat App.

26. For example, the exemplary Accused Products allow users to establish groups and to exchange messages via interaction with servers which provide the Snapchat service, among other relevant services. The exemplary Accused Products further allow users to retrieve map information from multiple sources.

27. The exemplary Accused Products are programmed to receive messages from other devices where those messages relate to joining groups, as depicted below:

How to Create Group Chats on Snapchat

Group Chats let you and up to 200 friends stay in touch and share the moment together.

To start a Group Chat, tap the chat icon at the bottom of the Chat screen and select who you want to Chat with!

To view a Group Chat, tap it on the Chat screen. You can find your Groups in [Search](#), too 🔍

Group Chat Tips

- Snaps you send to a Group don't count for [Snapstreaks](#) with individual Snapchatters 🚫 🔥
- Press and hold on a Chat to see who's read it, saved it, and more.
- When Group members open a Snap, their name appears below it in Chat.
- If you send a Bitmoji sticker, Friendmoji will only appear with the person who last sent a Chat to the Group.
- You can Mention a Group member in a Group Chat by typing their Display Name or by typing '@' and choosing their username.

4

How do I add Snapchat friends to a Group Chat?

Did someone get left out? You can add more members to the Group! Up to 101 Snapchatters can be in one group.

To add friends to a Group Chat...

1. Swipe right from the Camera screen to go to the Chat screen
2. Press and hold on a Group Chat
3. Tap **Add Members to Group** and select more friends!

When a Group member opens the Group Chat, you'll see their Bitmoji and name above your keyboard! The colors are random and can't be customized.

Tap a friend's name bubble to view their [Friendship Profile](#)! If you tap on someone who isn't your friend, you'll see an option to add them.

5

28. The exemplary Accused Products are further programmed to facilitate participation in the group by communicating with a server and sending to and receiving location information, as depicted below:

⁴ <https://help.snapchat.com/hc/en-us/articles/7012348774804-How-to-Create-Group-Chats-on-Snapchat#:~:text=Group%20Chats%20let%20you%20and,you%20want%20to%20Chat%20with!&text=Press%20and%20hold%20on%20a,%2C%20saved%20it%2C%20and%20more>

⁵ <https://help.snapchat.com/hc/en-us/articles/7012337635604-How-do-I-add-Snapchat-friends-to-a-Group-Chat>

How do I share my Live Location with friends?

Stay safe on the go and let a close friend or family member know where you are in real time by temporarily or indefinitely sharing your Live Location with them!

Your Live Location is shared with your chosen friends even while you are in Ghost Mode, and you can choose to stop sharing at any time without prompting a notification to your friends.

Please Note: When you enable Live Location sharing, your device's precise location data is collected and shared with your selected friends even when you have the Snapchat app closed. Collecting this data allows us to share your live location with friends, and improve your overall experience in the app!

To share your Live Location with a friend...

1. Go to a Friendship Profile
2. Tap '**Share My Live Location**' under the 'Snap Map' section
3. Choose how long you want to share your Live Location with a close friend or family member (Always, 8 hours, 1 hour)

To stop sharing your Live Location with a friend...


1. Go to the Profile of the friend that you want to stop sharing your Live Location with
2. Tap '**Stop**' under the 'Snap Map' section

6

⁶ <https://help.snapchat.com/hc/en-us/articles/7012295450900-How-do-I-share-my-Live-Location-with-friends>


How do I share my location with all of my friends on Snapchat?

To share your location with all of your friends on Snapchat:

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap **'My Friends'**

When you enable 'My Friends,' your location will be shared with all of your friends – including friends you add in the future! This option doesn't include people who've added you as a friend, but who you haven't added back. If you choose this option, we'll check in from time to time to make sure you still want to share your location with all of your friends.

Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map only updates when you have Snapchat open – your location won't update in the background. Your location on the Map will expire after 24 hours.

Warning  Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

7

⁷ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat-#:~:text=Please%20Note%3A%20If%20you%20and,will%20expire%20after%2024%20hours>


How do I share my location with only select friends on Snapchat?

You can update your settings to only share your location with select friends on Snapchat.

My Friends, Except...

Your location will be shared with all of your friends, except the friends on this list 


To enable this setting...

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap '**My Friends, Except...**' and select the friends you don't want to see your location.


Only These Friends...

Choose specific friends to share your location with! Friends you select aren't notified when you choose them. If a friend isn't appearing in this list, it could be because they haven't added you as a friend on Snapchat.

To enable this setting...

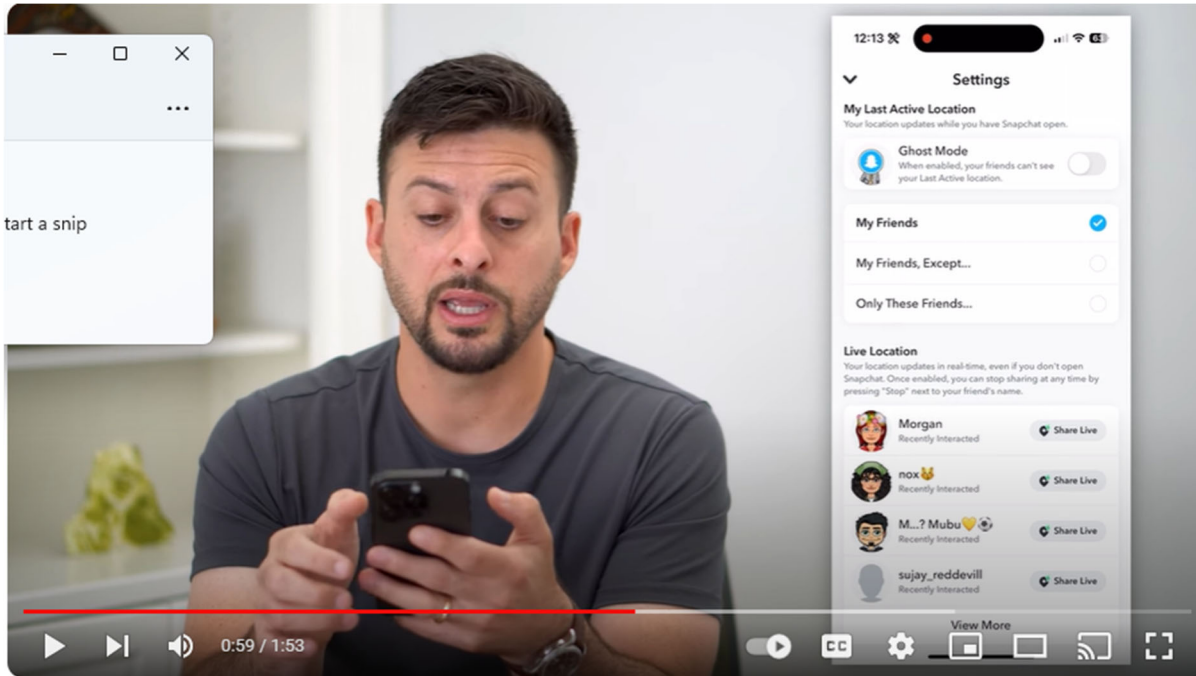
1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap '**Only These Friends**' to select the friends you want to see your location.

Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map only updates when you have Snapchat open – your location won't update in the background. Your location on the Map will expire after 24 hours.

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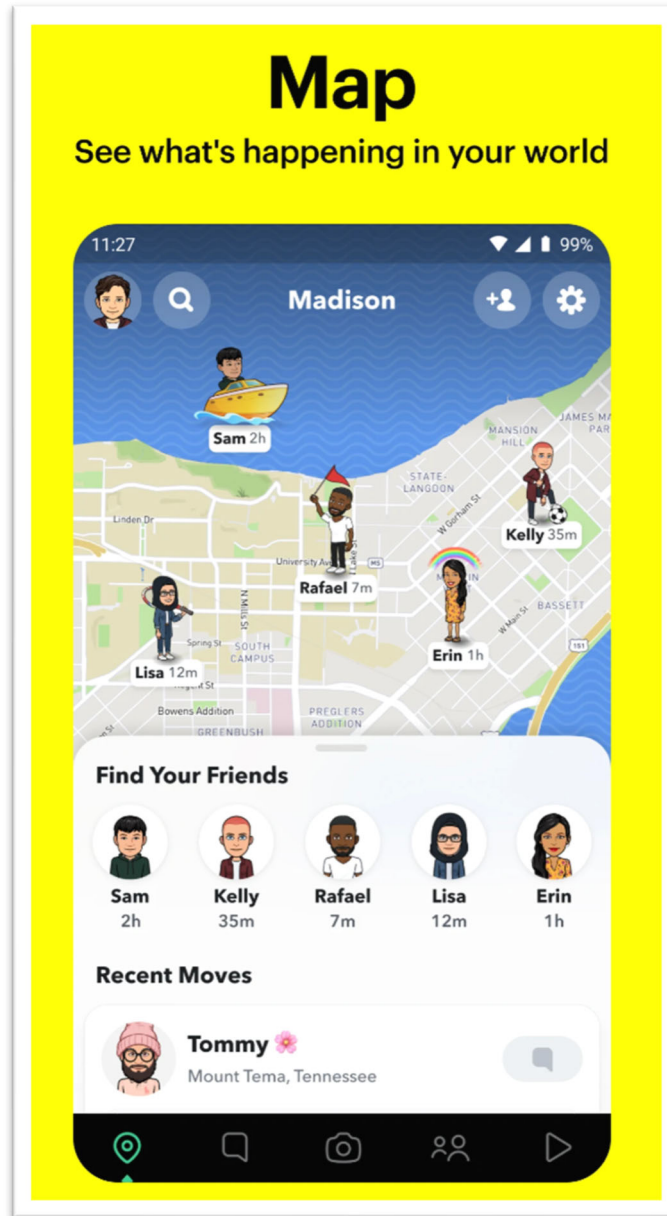
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⁸ <https://help.snapchat.com/hc/en-us/articles/7012277077140-How-do-I-share-my-location-with-only-select-friends-on-Snapchat>



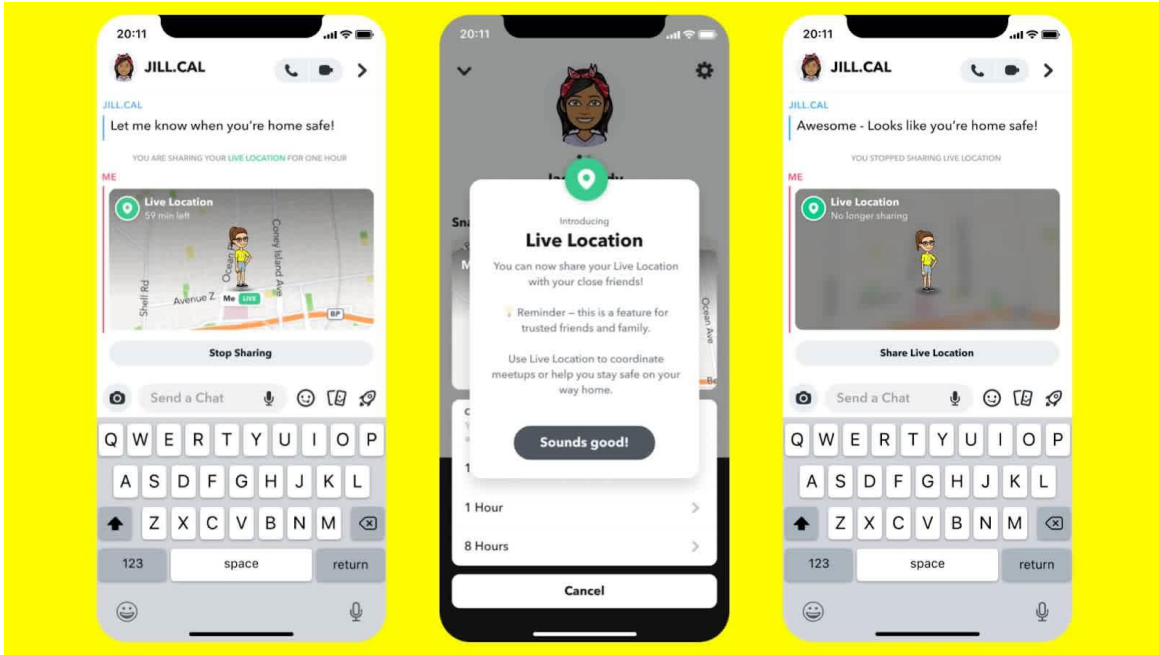
29. This location information is presented on interactive displays on the exemplary Accused Products which include interactive maps and a plurality of user selectable symbols corresponding to other devices. These symbols are positioned on the map at positions corresponding to the locations of the other devices, as depicted below:

⁹ <https://www.youtube.com/watch?v=kJj5K7oXGs>

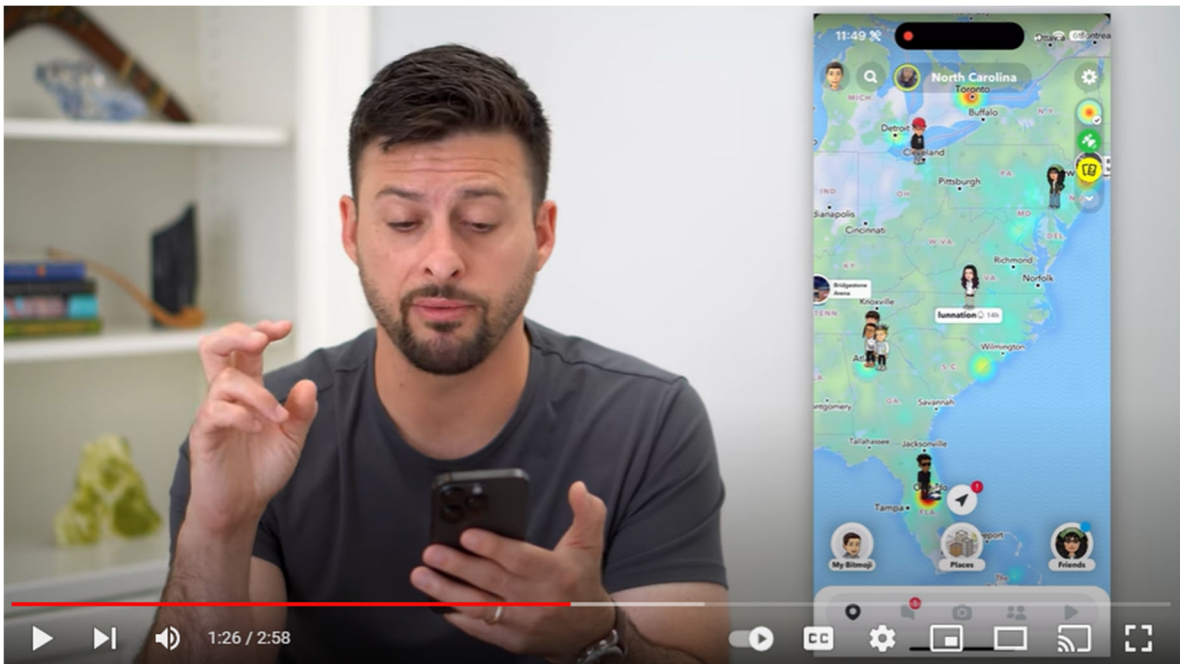


10

¹⁰ https://play.google.com/store/apps/details?id=com.snapchat.android&hl=en_US&gl=US



11



12

¹¹ <https://values.snap.com/news/looking-out-for-friends-on-the-snap-map>

¹² <https://www.youtube.com/watch?v=vIL858323rc>




13

[Snapchat Support](#) > [Using Snapchat](#) > [Snap Map](#) > [My Location and Ghost Mode](#) >


How do I share my location with all of my friends on Snapchat?

To share your location with all of your friends on Snapchat:

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap 'My Friends'

When you enable 'My Friends,' your location will be shared with all of your friends — including friends you add in the future! This option doesn't include people who've added you as a friend, but who you haven't added back. If you choose this option, we'll check in from time to time to make sure you still want to share your location with all of your friends.

Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map updates based on your device's location permissions. If your permissions are set to "Only while using," your location on the map will expire after 24 hours.

Warning  Your Live Location is shared with your chosen friends even while you are in Ghost Mode, and Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

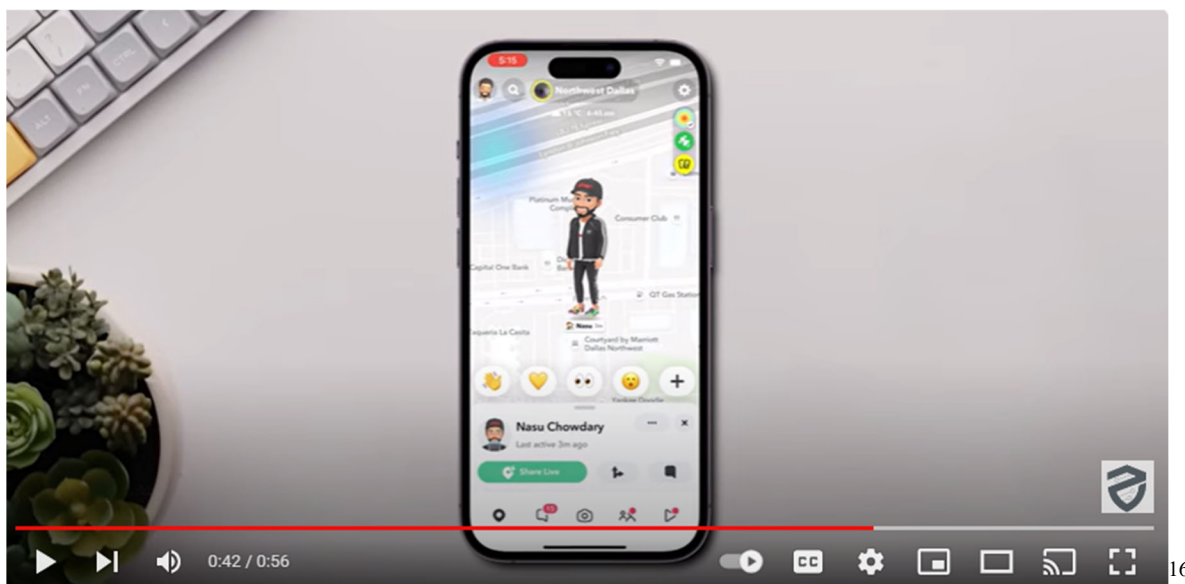
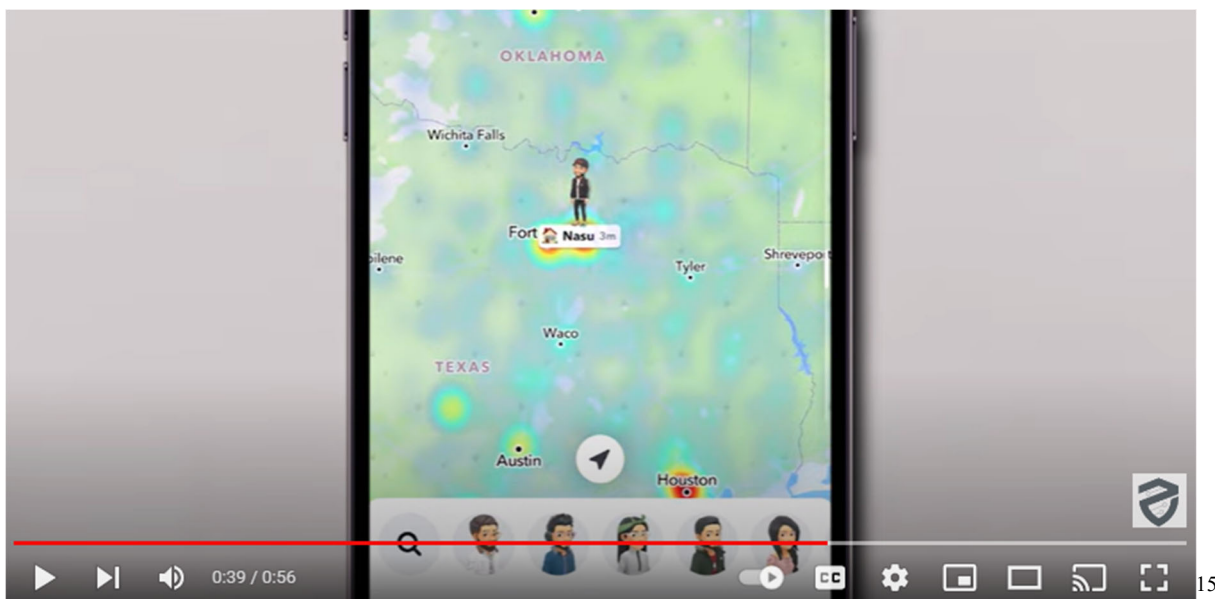
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30. The exemplary Accused Products are programmed to permit users to request and display additional maps by, for example, moving the map screen and/or by selecting satellite image maps. The exemplary Accused Products are further programmed to permit interaction with the

¹³ <https://www.youtube.com/watch?v=vIL858323rc>

¹⁴ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat>

display where a user may select one or more symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.



31. AGIS Software has suffered damages as a result of Defendant's direct and indirect infringement of the '251 Patent in an amount to be proved at trial.

¹⁵ <https://www.youtube.com/watch?v=yjw7DmknDPI>

¹⁶ <https://www.youtube.com/watch?v=yjw7DmknDPI>

32. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '251 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

COUNT II
(Infringement of the '838 Patent)

33. Paragraphs 1 through 18 are incorporated herein by reference as if fully set forth in their entireties.

34. AGIS Software has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, distribute, export from, or import any products that embody the inventions of the '838 Patent.

35. Defendant has and continues to directly infringe at least claim 54 of the '838 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

36. Defendant has and continues to directly infringe at least claim 54 of the '838 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

37. Defendant has and continues to indirectly infringe at least claim 54 of the '838 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products and by instructing users of the Accused Products to perform methods claimed in the '838 Patent. For example, Defendant, with knowledge that the Accused Products infringe the '838 Patent at least as of the

date of this Complaint, actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce direct infringement of the '838 Patent.

38. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 54 of the '838 Patent in the United States because Defendant's customers use the Accused Products, including at least the Snapchat application, in accordance with Defendant's instructions and thereby directly infringe at least one claim of the '838 Patent in violation of 35 U.S.C. § 271. Defendant 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: <https://www.snapchat.com/download>; <https://help.snapchat.com/hc/en-us>; and Defendant's agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '838 Patent under 35 U.S.C. § 271(b).

39. For example, Defendant's Accused Products allow users to share their locations and view other users' locations on a map and to communicate with those users via the Snapchat application:

40. For example, the exemplary Accused Products allow users to establish groups and to exchange messages via interaction with servers which provide the Snapchat services, among other relevant services. The exemplary Accused Products further allow users to retrieve map information from multiple sources, including street-view maps.

41. The exemplary Accused Products are programmed to receive messages from other devices where those messages relate to joining groups, as depicted below:

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18

¹⁷ <https://help.snapchat.com/hc/en-us/articles/7012348774804-How-to-Create-Group-Chats-on-Snapchat#:~:text=Group%20Chats%20let%20you%20and,you%20want%20to%20Chat%20with!&text=Press%20and%20hold%20on%20a,%2C%20saved%20it%2C%20and%20more>

¹⁸ <https://help.snapchat.com/hc/en-us/articles/7012337635604-How-do-I-add-Snapchat-friends-to-a-Group-Chat>

42. The exemplary Accused Products are further programmed to facilitate participation in the group by communicating with a server and sending to and receiving location information, as depicted below:

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Please Note: When you enable Live Location sharing, your device's precise location data is collected and shared with your selected friends even when you have the Snapchat app closed. Collecting this data allows us to share your live location with friends, and improve your overall experience in the app!

To share your Live Location with a friend...

1. Go to a Friendship Profile
2. Tap '**Share My Live Location**' under the 'Snap Map' section
3. Choose how long you want to share your Live Location with a close friend or family member (Always, 8 hours, 1 hour)

To stop sharing your Live Location with a friend...


1. Go to the Profile of the friend that you want to stop sharing your Live Location with
2. Tap '**Stop**' under the 'Snap Map' section

19

¹⁹ <https://help.snapchat.com/hc/en-us/articles/7012295450900-How-do-I-share-my-Live-Location-with-friends>


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Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map only updates when you have Snapchat open – your location won't update in the background. Your location on the Map will expire after 24 hours.

Warning  Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

20

²⁰ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat-#:~:text=Please%20Note%3A%20If%20you%20and,will%20expire%20after%2024%20hours>


How do I share my location with only select friends on Snapchat?

You can update your settings to only share your location with select friends on Snapchat.

My Friends, Except...

Your location will be shared with all of your friends, except the friends on this list 


To enable this setting...

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap **'My Friends, Except...'** and select the friends you don't want to see your location.


Only These Friends...

Choose specific friends to share your location with! Friends you select aren't notified when you choose them. If a friend isn't appearing in this list, it could be because they haven't added you as a friend on Snapchat.

To enable this setting...

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap **'Only These Friends'** to select the friends you want to see your location.

Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map only updates when you have Snapchat open – your location won't update in the background. Your location on the Map will expire after 24 hours.

Warning  Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

21

²¹ <https://help.snapchat.com/hc/en-us/articles/7012277077140-How-do-I-share-my-location-with-only-select-friends-on-Snapchat>




²² <https://www.youtube.com/watch?v=vIL858323rc>

²³ <https://www.youtube.com/watch?v=vIL858323rc>

[Snapchat Support](#) > [Using Snapchat](#) > [Snap Map](#) > [My Location and Ghost Mode](#) >


How do I share my location with all of my friends on Snapchat?

To share your location with all of your friends on Snapchat:

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap 'My Friends'

When you enable 'My Friends,' your location will be shared with all of your friends — including friends you add in the future! This option doesn't include people who've added you as a friend, but who you haven't added back. If you choose this option, we'll check in from time to time to make sure you still want to share your location with all of your friends.

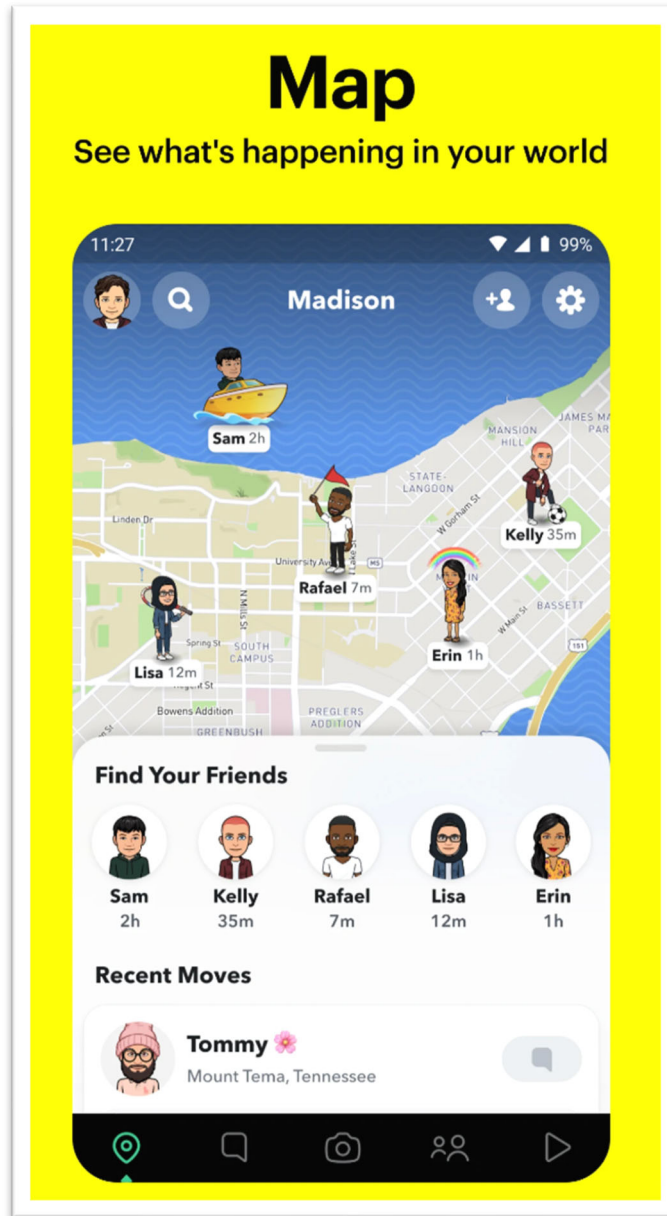
Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map updates based on your device's location permissions. If your permissions are set to "Only while using," your location on the map will expire after 24 hours.

Warning  Your Live Location is shared with your chosen friends even while you are in Ghost Mode, and Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

24

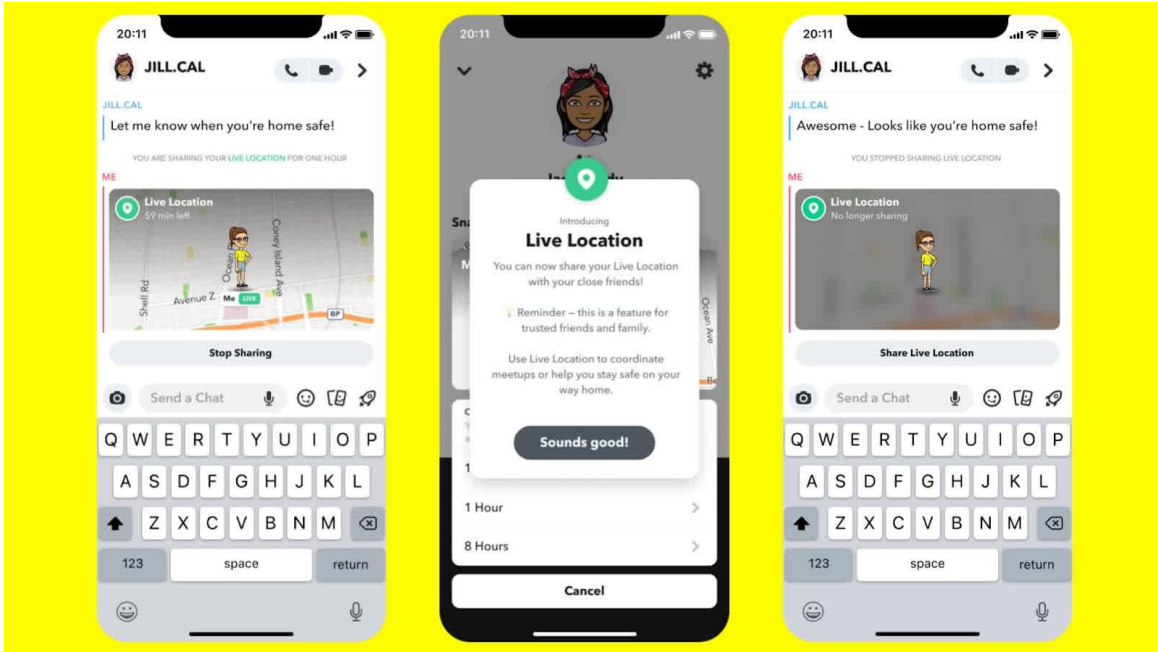
43. This location information is presented on interactive displays on the exemplary Accused Products which include interactive maps and a plurality of user selectable symbols corresponding to other devices. These symbols are positioned on the map at positions corresponding to the locations of the other devices, as depicted below:

²⁴ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat>



25

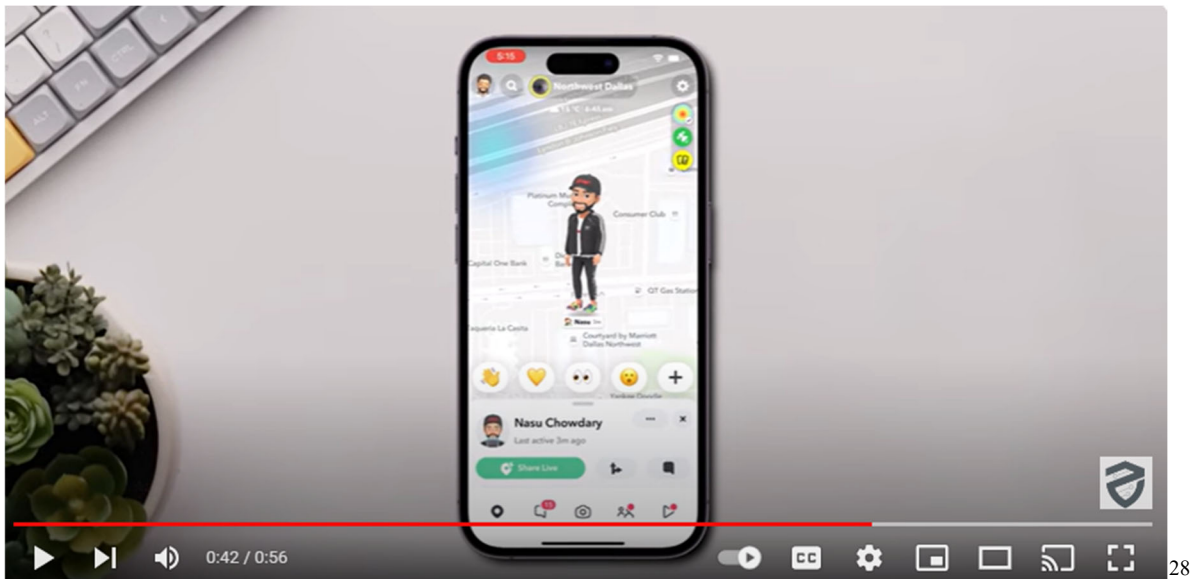
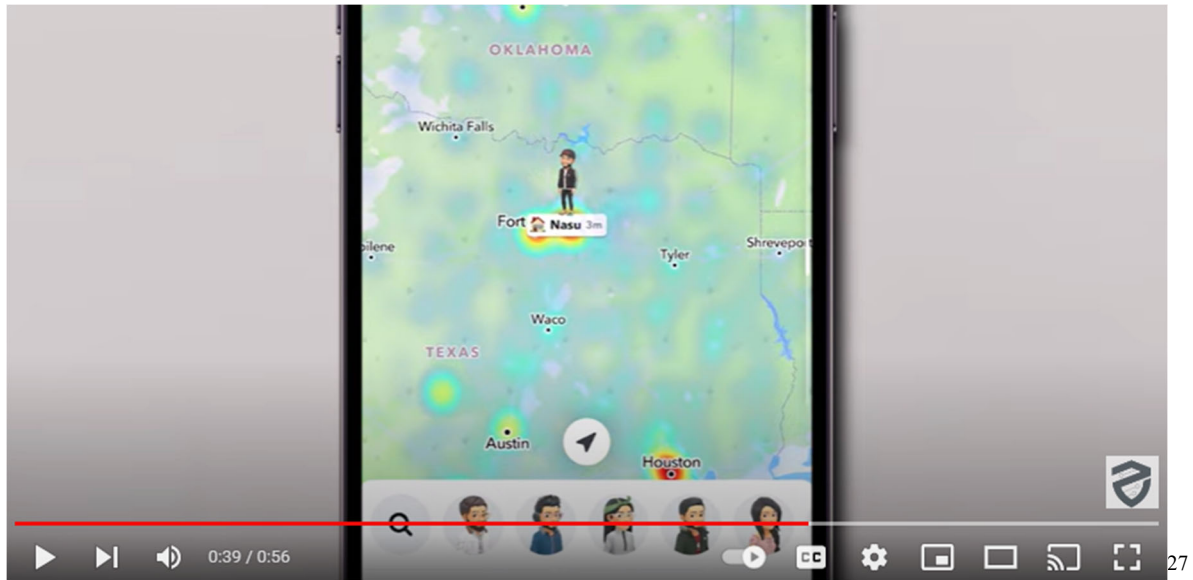
²⁵ https://play.google.com/store/apps/details?id=com.snapchat.android&hl=en_US&gl=US



26

44. The exemplary Accused Products are programmed to permit users to request and display additional maps by, for example, moving the map screen and/or by selecting satellite image maps. The exemplary Accused Products are further programmed to permit interaction with the display where a user may select one or more symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.

²⁶ <https://values.snap.com/news/looking-out-for-friends-on-the-snap-map>



45. AGIS Software has suffered damages as a result of Defendant's direct and indirect infringement of the '838 Patent in an amount to be proved at trial.

46. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '838 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

²⁷ <https://www.youtube.com/watch?v=yjw7DmknDPI>

²⁸ <https://www.youtube.com/watch?v=yjw7DmknDPI>

COUNT III
(Infringement of the '123 Patent)

47. Paragraphs 1 through 18 are incorporated herein by reference as if fully set forth in their entireties.

48. AGIS Software has not licensed or otherwise authorized Defendant to make, use, offer for sale, sell, distribute, export from, or import any products that embody the inventions of the '123 Patent.

49. Defendant has and continues to directly infringe at least claim 23 of the '123 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

50. Defendant has and continues to indirectly infringe at least claim 23 of the '123 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the infringing Accused Products and by instructing users of the Accused Products to perform at least the method of claim 23 in the '123 Patent. For example, Defendant, with knowledge that the Accused Products infringe the '123 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce direct infringement of at least claim 23 of the '123 Patent in violation of 35 U.S.C. § 271(b). Alternatively, Defendant believed there was a high probability that others would infringe the '123 Patent but remained willfully blind to the infringing nature of others' actions.

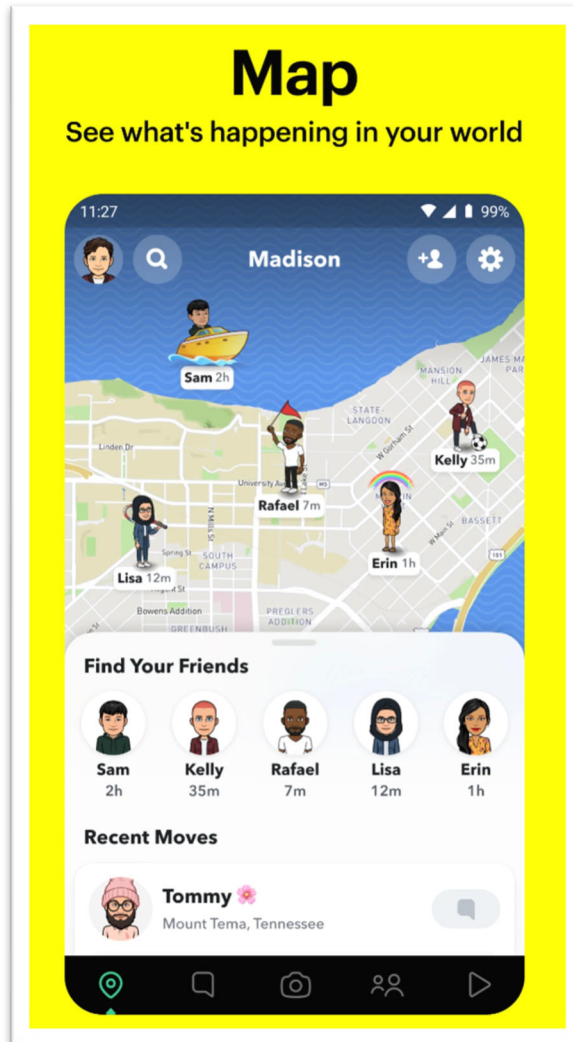
51. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 23 of the '123 Patent in the United States because Defendant's customers use the

Accused Products, including at least the Snapchat Apps and/or services or the Accused Products with the Snapchat Apps and/or services, alone or in conjunction with additional Accused Products, in accordance with Defendant's instructions and thereby directly infringe at least one claim of the '123 Patent in violation of 35 U.S.C. § 271. Defendant 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: <https://www.snapchat.com/download>; <https://help.snapchat.com/hc/en-us> and Defendant's agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '123 Patent under 35 U.S.C. § 271(b).

52. Alternatively, Defendant believed there was a high probability that others would infringe the '123 Patent but remained willfully blind to the infringing nature of others' actions. For example, Defendant directly infringes and/or indirectly infringes by instructing its customers to infringe by a system comprising: a first device programmed to perform operations comprising: receiving a message sent by a second device, wherein the message relates to joining a group; based on receipt of the message sent by the second device, sending first location information to a first server and receiving second location information from the first server, the first location information comprising a location of the first device, the second location information comprising one or more locations of one or more respective second devices included in the group; sending, from the first device to a second server, a request for georeferenced map data; receiving, from the second server, the georeferenced map data; presenting, via an interactive display of the first device, a georeferenced map and one or more user-selectable symbols corresponding to one or more of the second devices, wherein the symbols are positioned on the georeferenced map at respective positions corresponding to the locations of the second devices represented by the symbols, and

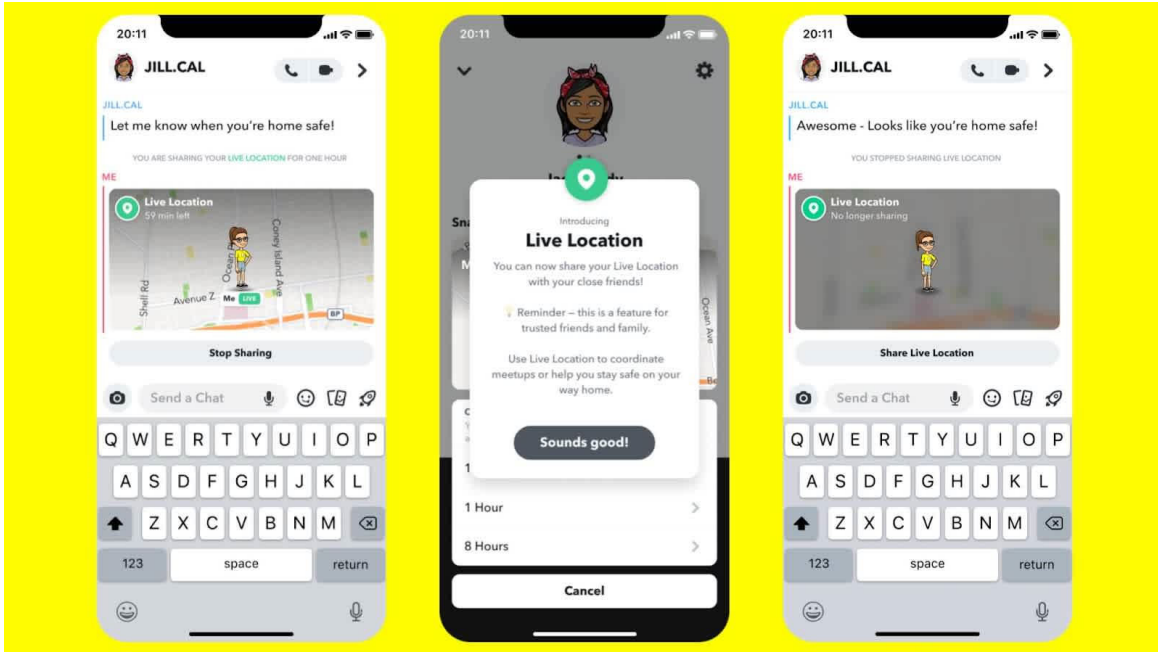
wherein the georeferenced map data relate positions on the georeferenced map to spatial coordinates; and identifying user interaction with the interactive display selecting a particular user-selectable symbol corresponding to a particular second device and user interaction with the display specifying an action and, based thereon, using an Internet Protocol to send data to the particular second device, wherein identifying the user interaction selecting the particular user-selectable symbol comprises: detecting user selection of a portion of the interactive display corresponding to a position on the georeferenced map, and identifying the particular user-selectable symbol based, at least in part, on coordinates of the selected position, comprising: searching a set of symbols for a symbol located nearest to the coordinates of the selected position, wherein the set of symbols includes the user-selectable symbols corresponding to the second devices in the group, and wherein data associated with the set of symbols include coordinates of portions of the display corresponding to the symbols in the set, and based on a result of searching the set of symbols, identifying the particular user-selectable symbol as the symbol located nearest to the coordinates of the selected position, wherein the particular user-selectable symbol corresponds to the particular second device. For example, the Accused Products include features, as shown below.

53. For example, Defendant's Accused Products allow users to share their locations and view others' locations on a map and to communicate with those users via the Snapchat App.



29

²⁹ https://play.google.com/store/apps/details?id=com.snapchat.android&hl=en_US&gl=US



30

54. Additionally, the exemplary Accused Products allow users to establish groups and to exchange messages via interaction with servers which provide the Snapchat servers, among other relevant services.

55. The exemplary Accused Products are programmed to form and join groups by transmitting messages:

³⁰ <https://values.snap.com/news/looking-out-for-friends-on-the-snap-map>

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Group Chats let you and up to 200 friends stay in touch and share the moment together.

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Group Chat Tips

- Snaps you send to a Group don't count for [Snapstreaks](#) with individual Snapchatters 🚫 🔥
- [Press and hold on a Chat to see who's read it, saved it, and more.](#)
- When Group members open a Snap, their name appears below it in Chat.
- If you send a Bitmoji sticker, Friendmoji will only appear with the person who last sent a Chat to the Group.
- You can Mention a Group member in a Group Chat by typing their Display Name or by typing '@' and choosing their username.

31

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1. Swipe right from the Camera screen to go to the Chat screen
2. Press and hold on a Group Chat
3. Tap **'Add Members to Group'** and select more friends!

When a Group member opens the Group Chat, you'll see their Bitmoji and name above your keyboard! The colors are random and can't be customized.

Tap a friend's name bubble to view their [Friendship Profile](#)! If you tap on someone who isn't your friend, you'll see an option to add them.

32

56. The exemplary Accused Products are further programmed to facilitate participation in the groups by communicating with one or more servers and sending to and receiving location information, as depicted below:

³¹ <https://help.snapchat.com/hc/en-us/articles/7012348774804-How-to-Create-Group-Chats-on-Snapchat#:~:text=Group%20Chats%20let%20you%20and,you%20want%20to%20Chat%20with!&text=Press%20and%20hold%20on%20a,%2C%20saved%20it%2C%20and%20more>

³² <https://help.snapchat.com/hc/en-us/articles/7012337635604-How-do-I-add-Snapchat-friends-to-a-Group-Chat>

How do I share my Live Location with friends?

Stay safe on the go and let a close friend or family member know where you are in real time by temporarily or indefinitely sharing your Live Location with them!

Your Live Location is shared with your chosen friends even while you are in Ghost Mode, and you can choose to stop sharing at any time without prompting a notification to your friends.

Please Note: When you enable Live Location sharing, your device's precise location data is collected and shared with your selected friends even when you have the Snapchat app closed. Collecting this data allows us to share your live location with friends, and improve your overall experience in the app!

To share your Live Location with a friend...

1. Go to a Friendship Profile
2. Tap '**Share My Live Location**' under the 'Snap Map' section
3. Choose how long you want to share your Live Location with a close friend or family member (Always, 8 hours, 1 hour)

To stop sharing your Live Location with a friend...


1. Go to the Profile of the friend that you want to stop sharing your Live Location with
2. Tap '**Stop**' under the 'Snap Map' section

33

³³ <https://help.snapchat.com/hc/en-us/articles/7012295450900-How-do-I-share-my-Live-Location-with-friends>


How do I share my location with all of my friends on Snapchat?

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When you enable 'My Friends,' your location will be shared with all of your friends – including friends you add in the future! This option doesn't include people who've added you as a friend, but who you haven't added back. If you choose this option, we'll check in from time to time to make sure you still want to share your location with all of your friends.

Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map only updates when you have Snapchat open – your location won't update in the background. Your location on the Map will expire after 24 hours.

Warning  Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

34

³⁴ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat-#:~:text=Please%20Note%3A%20If%20you%20and,will%20expire%20after%2024%20hours>


How do I share my location with only select friends on Snapchat?

You can update your settings to only share your location with select friends on Snapchat.

My Friends, Except...

Your location will be shared with all of your friends, except the friends on this list 


To enable this setting...

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap '**My Friends, Except...**' and select the friends you don't want to see your location.


Only These Friends...

Choose specific friends to share your location with! Friends you select aren't notified when you choose them. If a friend isn't appearing in this list, it could be because they haven't added you as a friend on Snapchat.

To enable this setting...

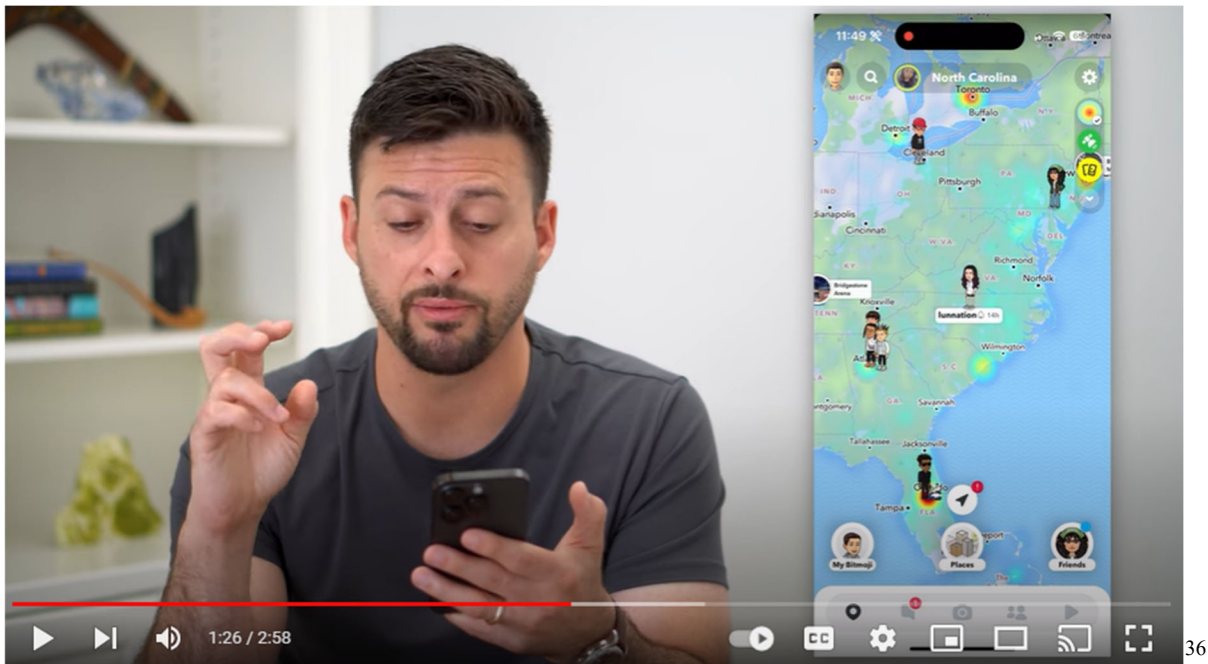
1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap '**Only These Friends**' to select the friends you want to see your location.

Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map only updates when you have Snapchat open – your location won't update in the background. Your location on the Map will expire after 24 hours.

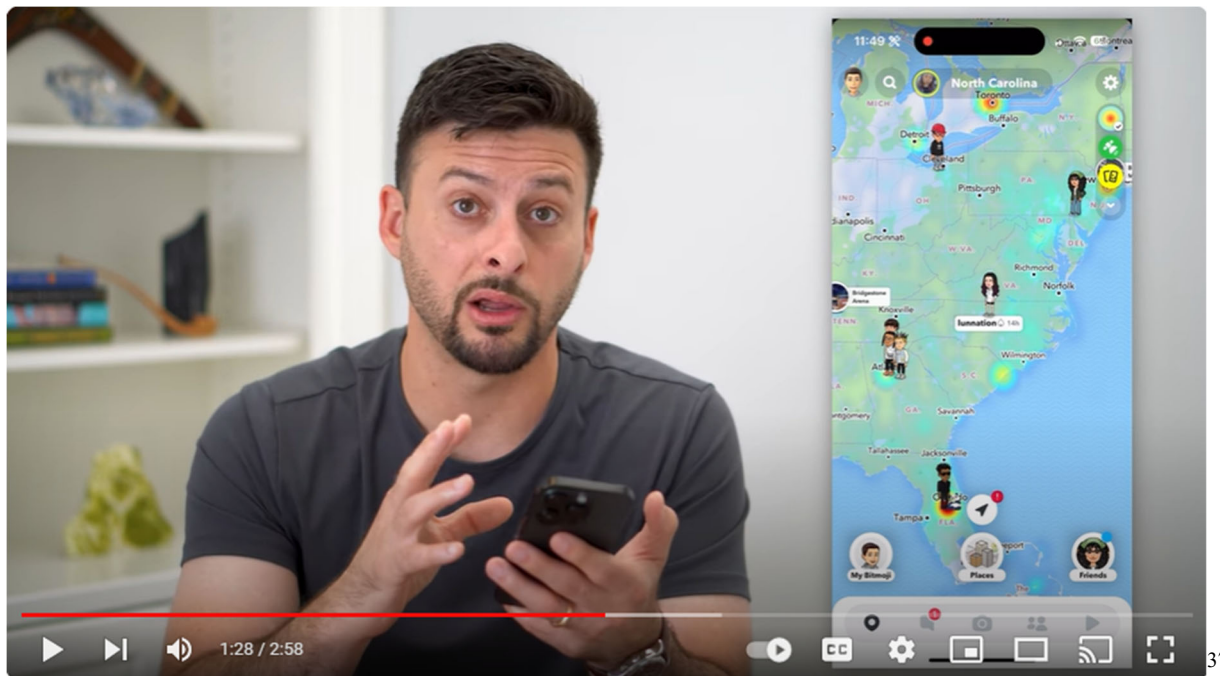
Warning  Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

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³⁵ <https://help.snapchat.com/hc/en-us/articles/7012277077140-How-do-I-share-my-location-with-only-select-friends-on-Snapchat>



36



37


³⁶ <https://www.youtube.com/watch?v=vIL858323rc>

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[Snapchat Support](#) > [Using Snapchat](#) > [Snap Map](#) > [My Location and Ghost Mode](#) >


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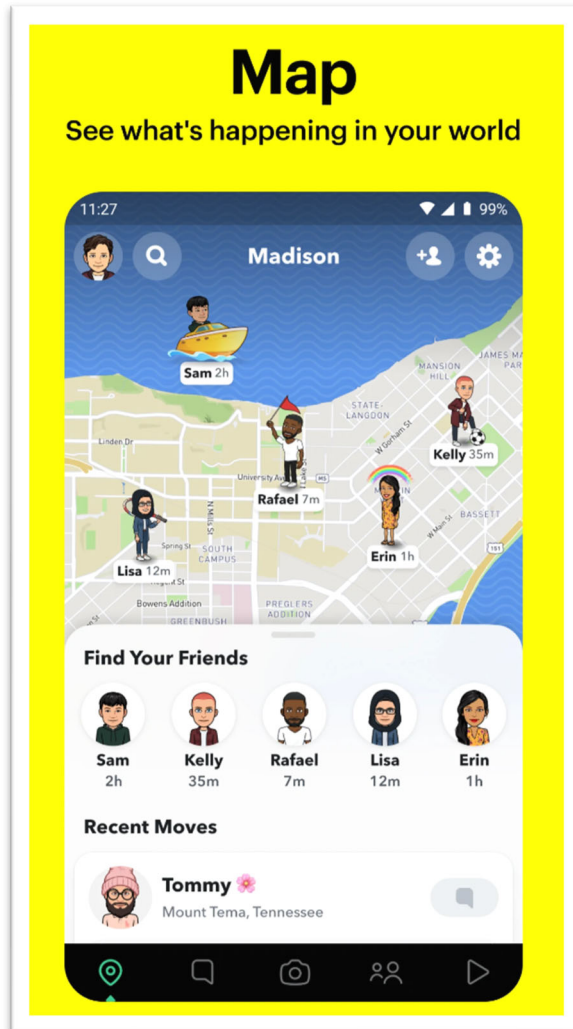
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Warning  Your Live Location is shared with your chosen friends even while you are in Ghost Mode, and Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

38

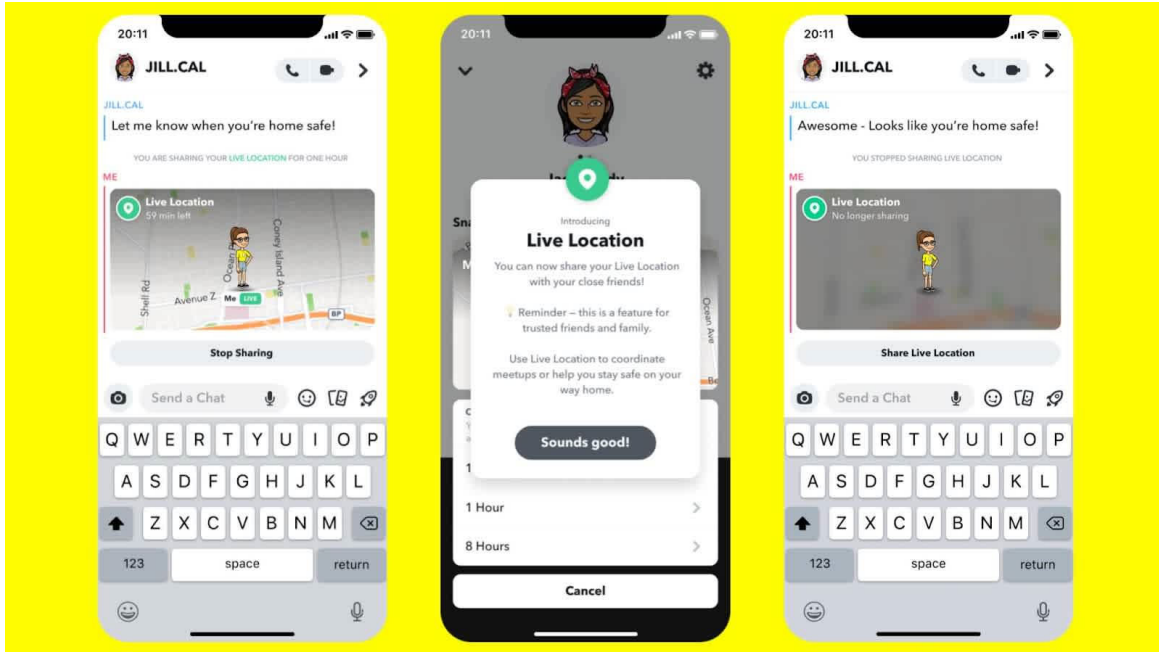
57. The location information is presented on interactive displays on the exemplary Accused Products which include interactive maps and a plurality of user selectable symbols corresponding to other devices. The symbols are positioned on the map at positions corresponding to the locations of the other devices, as depicted below:

³⁸ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat>



39

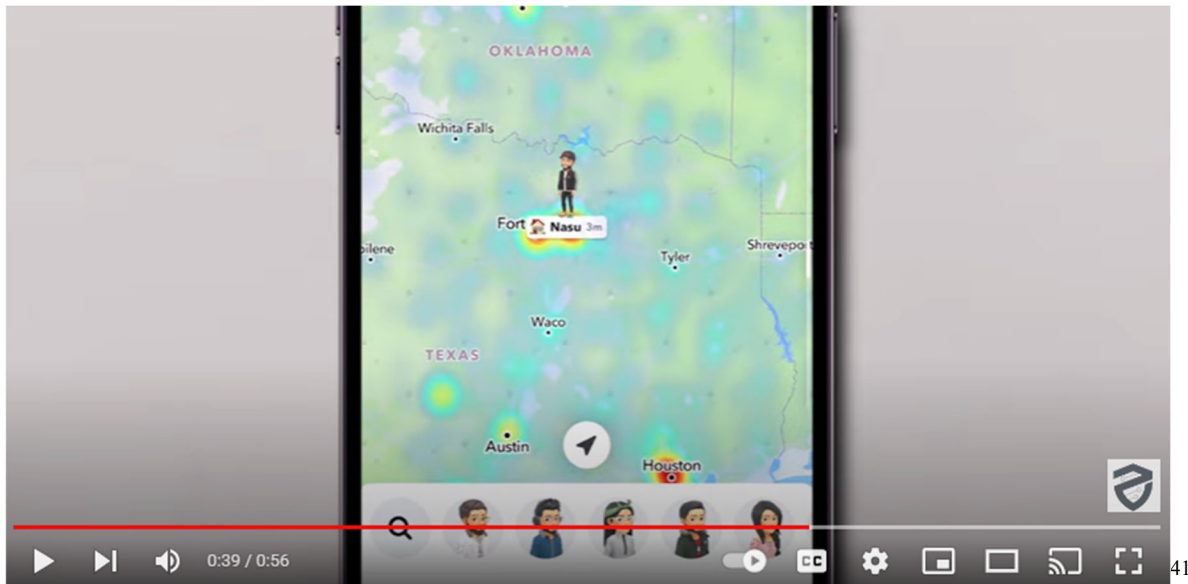
³⁹ https://play.google.com/store/apps/details?id=com.snapchat.android&hl=en_US&gl=US



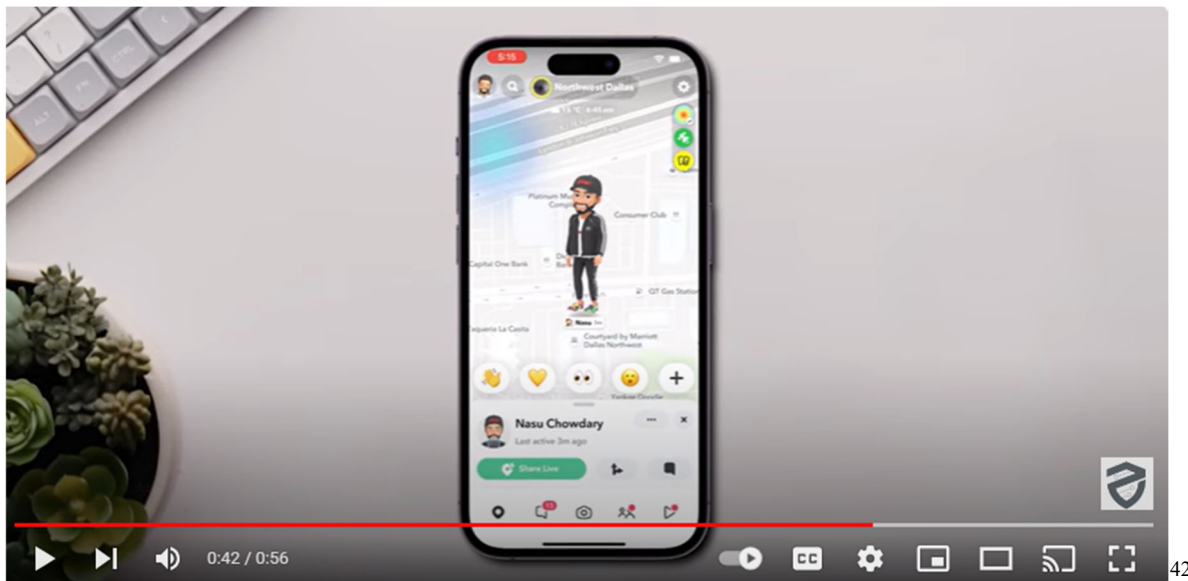
40

58. The exemplary Accused Products are further programmed to permit users to request and display additional maps from additional servers by, for example, moving the map screen and/or by selecting satellite images or other types of maps. The exemplary Accused Products are further programmed to permit interaction with the display where a user may select one or more symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.

⁴⁰ <https://values.snap.com/news/looking-out-for-friends-on-the-snap-map>



41



42

59. AGIS Software has suffered damages as a result of Defendant's direct and indirect infringement of the '123 Patent in an amount to be proved at trial.

60. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '123 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

⁴¹ <https://www.youtube.com/watch?v=yjw7DmknDPI>

⁴² <https://www.youtube.com/watch?v=yjw7DmknDPI>

COUNT IV
(Infringement of the '829 Patent)

61. Paragraphs 1 through 18 are incorporated herein by reference as if fully set forth in their entireties.

62. AGIS Software has not licensed or otherwise authorized Defendant to make, use offer for sale, sell, distribute, export from, or import any products that embody the inventions of the '829 Patent.

63. Defendant has and continues to directly infringe at least claim 34 of the '829 Patent, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the Accused Products without authority and in violation of 35 U.S.C. § 271(a).

64. Defendant has and continues to indirectly infringe at least claim 34 of the '829 Patent by actively, knowingly, and intentionally inducing others to directly infringe, either literally or under the doctrine of equivalents, by making, using, selling, offering for sale, distributing, exporting from, and/or importing into the United States the infringing Accused Products and by instructing users of the Accused Products to perform at least the method of claim 34 in the '829 Patent. For example, Defendant, with knowledge that the Accused Products infringe the '829 Patent at least as of the date of this Complaint, actively, knowingly, and intentionally induced, and continues to actively, knowingly, and intentionally induce direct infringement of at least claim 34 of the '829 Patent in violation of 35 U.S.C. § 271(b). Alternatively, Defendant believed there was a high probability that others would infringe the '829 Patent but remained willfully blind to the infringing nature of others' actions.

65. For example, Defendant has indirectly infringed and continues to indirectly infringe at least claim 34 of the '829 Patent in the United States because Defendant's customers use the

Accused Products, including at least the Snapchat application, in accordance with Defendant's instructions and thereby directly infringe at least one claim of the '829 Patent in violation of 35 U.S.C. § 271. Defendant 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: <https://www.snapchat.com/download>; <https://help.snapchat.com/hc/en-us>; and Defendant's agents and representatives located within this Judicial District. Defendant is thereby liable for infringement of the '829 Patent under 35 U.S.C. § 271(b).

66. Alternatively, Defendant believed there was a high probability that others would infringe the '829 Patent but remained willfully blind to the infringing nature of others' actions. For example, Defendant directly infringes and/or indirectly infringes by instructing its customers to infringe by a system comprising: a second device programmed to perform operations comprising: receiving from a first device via a first server, a request to join a group, wherein the group includes the first device; sending, to the first server, an indication of acceptance of the request, wherein the first server is configured to join the first device to the group based on the acceptance of the request, and wherein joining the first device to the group comprises authorizing the first device to repeatedly share device location information and repeatedly engage in remote control operations with each device included in the group; sending a first message to the first server, wherein the first message comprises data identifying the first device and a request for a first updated location of the first device, and wherein the first server is configured to send a second message to the first device based on and in response to receiving the first message from the second device, wherein the second message comprises a request for the first updated location of the first device; after sending the first message, receiving, from the first server, a response to the first

message, the response including first location information comprising the first updated location of the first device; receiving from a second server, georeferenced map data; presenting, via a display of the second device, a georeferenced map based on the georeferenced map data and a symbol corresponding to the first device; wherein the symbol is positioned on the georeferenced map at a first position corresponding to the first updated location of the first device, and wherein the georeferenced map data relate positions on the georeferenced map to spatial coordinates; after receiving the first location information and the georeferenced map data, and after presenting the georeferenced map and the symbol positioned on the georeferenced map at the first position corresponding to the first updated location of the first device, receiving second location information comprising a second updated location of the first device from the first server, and using the server-provided georeferenced map data and the second location information to reposition the symbol on the georeferenced map at a second position corresponding to the second updated location of the first device; and identifying user interaction with the display specifying an action and, based thereon, sending, to the first server, a third message related to remotely controlling the first device to perform an action, wherein the first server is configured to send a fourth message to the first device based on receiving the third message from the second device, wherein the fourth message relates to remotely controlling the first device to perform the action, and wherein the first device is configured to perform the action based on receiving the fourth message. For example, the Accused Products include features, as shown below.

67. For example, Defendant's Accused Products allow users to share their locations and view other users' locations on a map and to communicate with those users via the Snapchat app.

68. Additionally, the exemplary Accused Products allow users to establish groups and to exchange messages via interaction with servers which provide the Snapchat services, among other relevant services.

69. The exemplary Accused Products are programmed to form and join groups by transmitting messages:

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70. The exemplary Accused Products are further programmed to facilitate participation in the groups by communicating with one or more servers and sending to and receiving location information, as depicted below:

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3. Choose how long you want to share your Live Location with a close friend or family member (Always, 8 hours, 1 hour)

To stop sharing your Live Location with a friend...


1. Go to the Profile of the friend that you want to stop sharing your Live Location with
2. Tap '**Stop**' under the 'Snap Map' section

45

⁴⁵ <https://help.snapchat.com/hc/en-us/articles/7012295450900-How-do-I-share-my-Live-Location-with-friends>


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Warning  Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

46

⁴⁶ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat-#:~:text=Please%20Note%3A%20If%20you%20and,will%20expire%20after%2024%20hours>


How do I share my location with only select friends on Snapchat?

You can update your settings to only share your location with select friends on Snapchat.

My Friends, Except...

Your location will be shared with all of your friends, except the friends on this list 


To enable this setting...

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap **'My Friends, Except...'** and select the friends you don't want to see your location.


Only These Friends...

Choose specific friends to share your location with! Friends you select aren't notified when you choose them. If a friend isn't appearing in this list, it could be because they haven't added you as a friend on Snapchat.

To enable this setting...

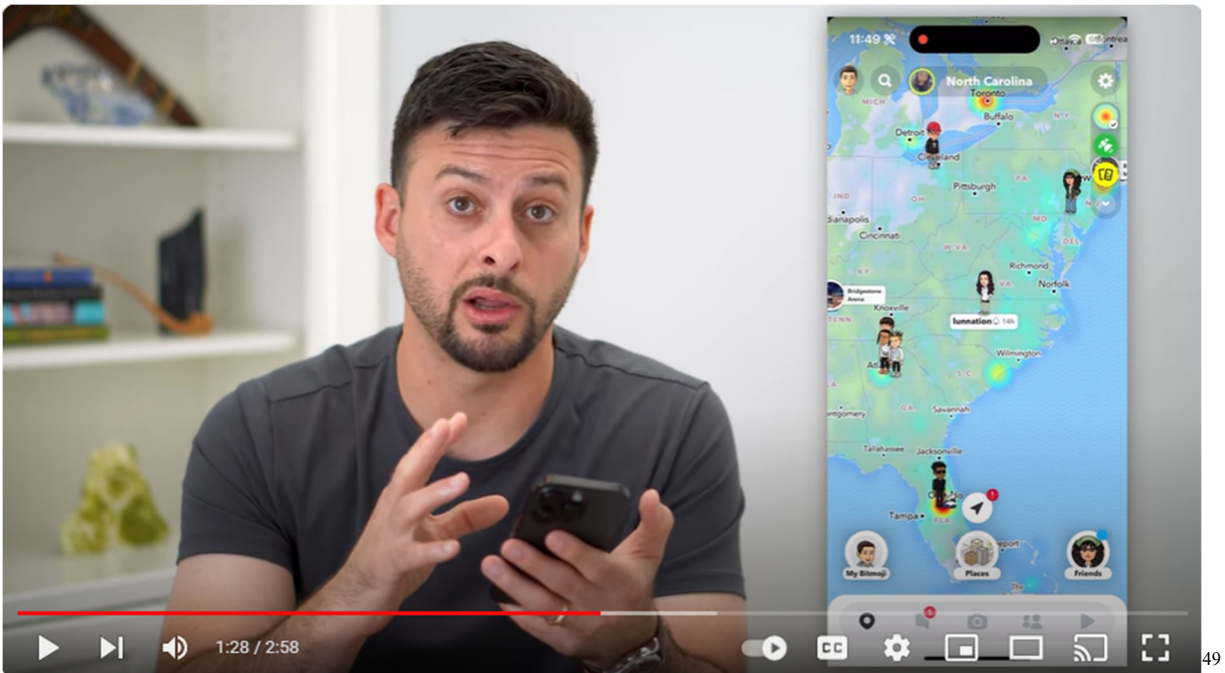
1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap **'Only These Friends'** to select the friends you want to see your location.

Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map only updates when you have Snapchat open – your location won't update in the background. Your location on the Map will expire after 24 hours.

Warning  Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

47

⁴⁷ <https://help.snapchat.com/hc/en-us/articles/7012277077140-How-do-I-share-my-location-with-only-select-friends-on-Snapchat>




⁴⁸ <https://www.youtube.com/watch?v=vIL858323rc>

⁴⁹ <https://www.youtube.com/watch?v=vIL858323rc>

[Snapchat Support](#) > [Using Snapchat](#) > [Snap Map](#) > [My Location and Ghost Mode](#) >


How do I share my location with all of my friends on Snapchat?

To share your location with all of your friends on Snapchat:

1. Open the Map
2. Tap the  button at the top of the Map screen
3. Tap 'My Friends'

When you enable 'My Friends,' your location will be shared with all of your friends — including friends you add in the future! This option doesn't include people who've added you as a friend, but who you haven't added back. If you choose this option, we'll check in from time to time to make sure you still want to share your location with all of your friends.

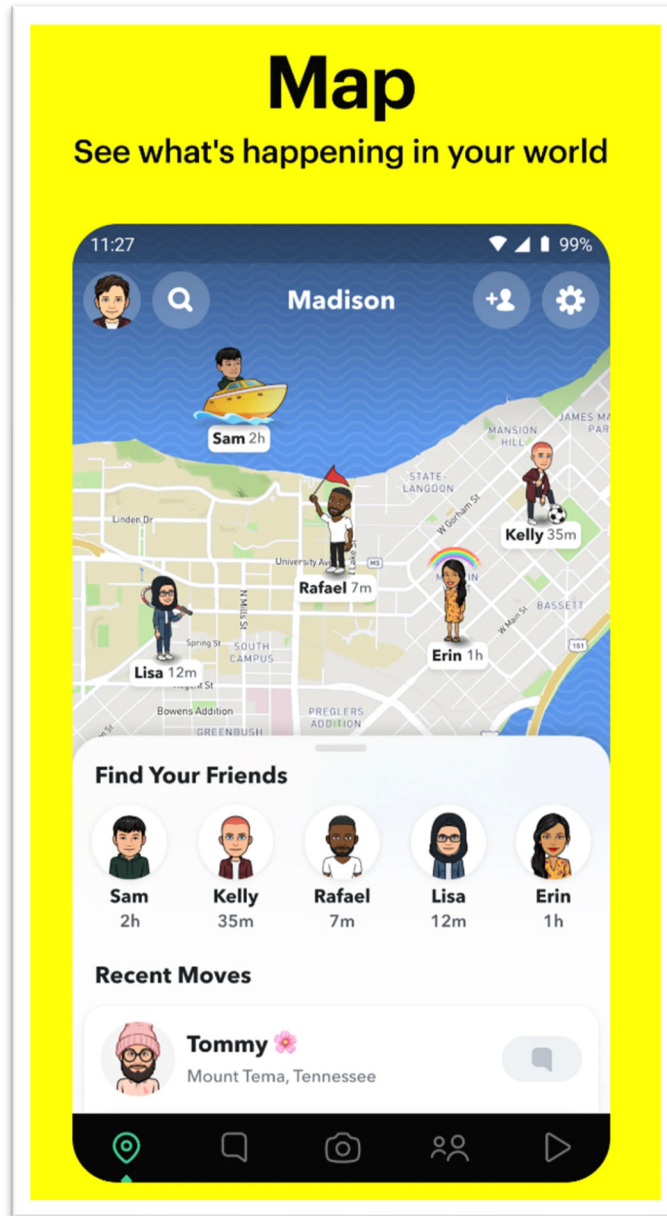
Please Note: If you and a friend have both added one another on Snapchat, you can choose to share your locations with each other on Snap Map. Your location on Snap Map updates based on your device's location permissions. If your permissions are set to "Only while using," your location on the map will expire after 24 hours.

Warning  Your Live Location is shared with your chosen friends even while you are in Ghost Mode, and Snaps you submit to Snap Map can still show up on the Map, no matter what location setting you choose!

50

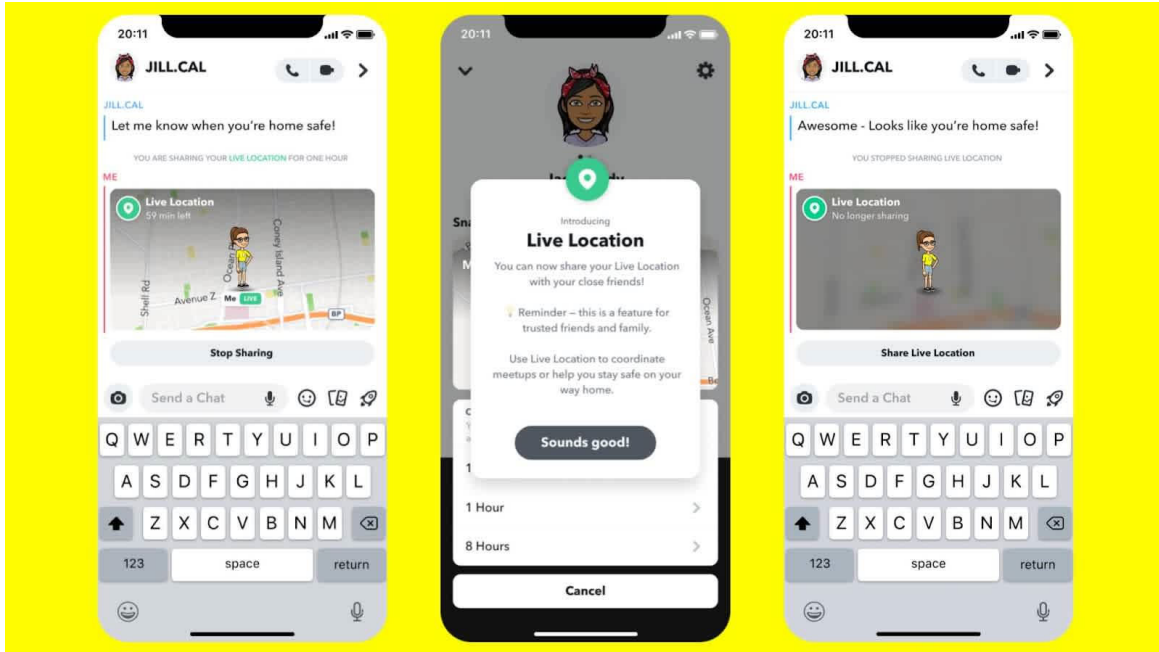
71. The location information is presented on interactive displays on the exemplary Accused Products which include interactive maps and a plurality of user selectable symbols corresponding to other devices. The symbols are positioned on the map at positions corresponding to the locations of the other devices, as depicted below:

⁵⁰ <https://help.snapchat.com/hc/en-us/articles/7012270909972-How-do-I-share-my-location-with-all-of-my-friends-on-Snapchat>



51

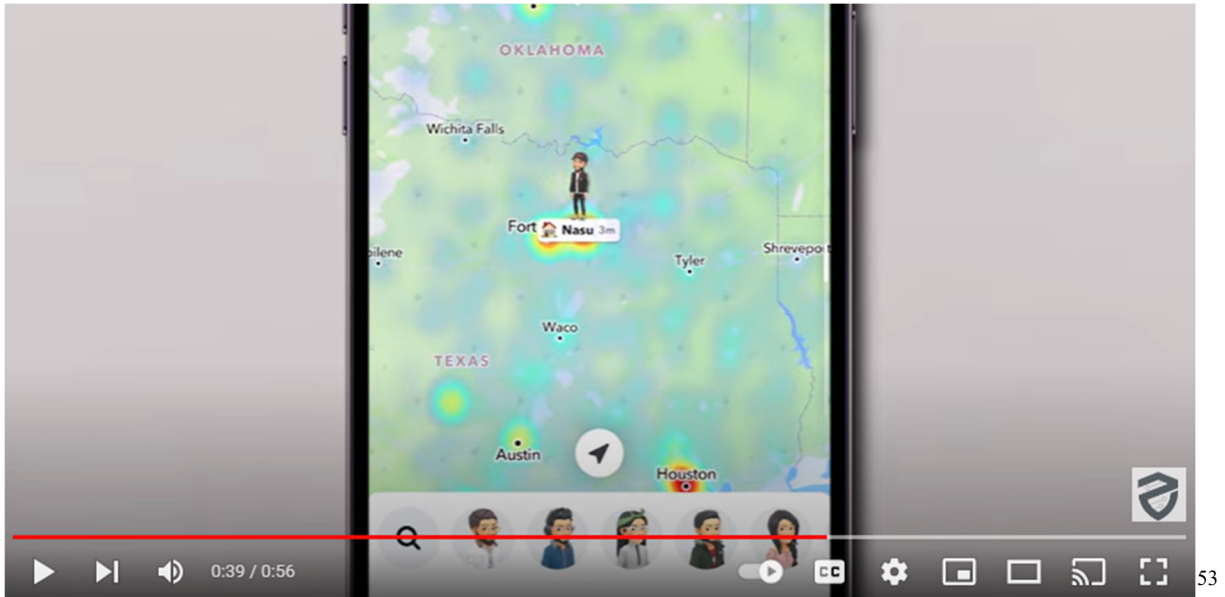
⁵¹ https://play.google.com/store/apps/details?id=com.snapchat.android&hl=en_US&gl=US



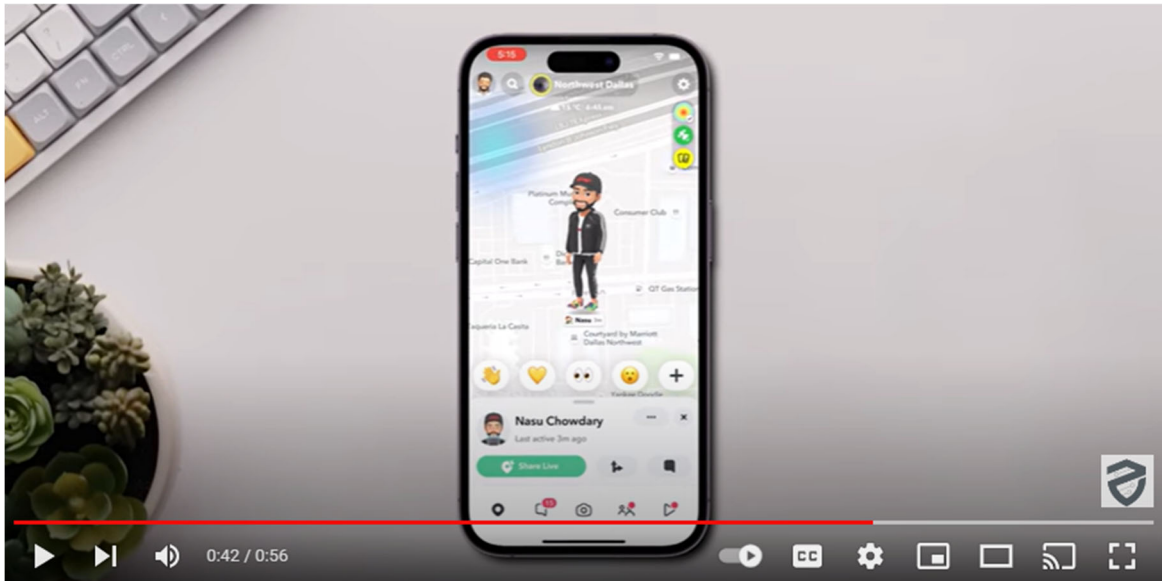
52

72. The exemplary Accused Products are further programmed to permit users to request and display additional maps from additional servers by, for example, moving the map screen and/or by selecting satellite images or other types of maps. The exemplary Accused Products are further programmed to permit interaction with the display where a user may select one or more symbols and where the exemplary Accused Products further permit data to be sent to other devices based on that interaction.

⁵² <https://values.snap.com/news/looking-out-for-friends-on-the-snap-map>



53



54

73. AGIS Software has suffered damages as a result of Defendant's direct and indirect infringement of the '829 Patent in an amount to be proved at trial.

⁵³ <https://www.youtube.com/watch?v=yjw7DmknDPI>

⁵⁴ <https://www.youtube.com/watch?v=yjw7DmknDPI>

74. AGIS Software has suffered, and will continue to suffer, irreparable harm as a result of Defendant's infringement of the '829 Patent for which there is no adequate remedy at law unless Defendant's infringement is enjoined by this Court.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury for all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, AGIS Software prays for relief against Defendant as follows:

- a. Entry of judgment declaring that Defendant has directly and/or indirectly infringed one or more claims of each of the Patents-in-Suit;
- b. Entry of judgment declaring that Defendant's infringement of the Patents-in-Suit have been willful and deliberate;
- c. An order pursuant to 35 U.S.C. § 283 permanently enjoining Defendant, its officers, agents, servants, employees, attorneys, and those persons in active concert or participation with it, from further acts of infringement of the Patents-in-Suit;
- d. An order awarding damages sufficient to compensate AGIS Software for Defendant's infringement of the Patents-in-Suit, but in no event less than a reasonable royalty, together with interest and costs;
- e. An order awarding AGIS Software treble damages under 35 U.S.C. § 284 as a result of Defendant's willful and deliberate infringement of the Patents-in-Suit;
- f. Entry of judgment declaring that this case is exceptional and awarding AGIS Software its costs and reasonable attorney fees under 35 U.S.C. § 285; and
- g. Such other and further relief as the Court deems just and proper.

Dated: August 23, 2024

Respectfully submitted,

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