

Exhibit A

ENOVSYS v UBER

February 8, 2024

U.S. Patent No. 6,441,752

’752 Patent, Claim 9	Infringement Contentions
verifying whether the tracking and tracked unit(s) have traveled a minimum pre-specified distance over the tracking period;	Uber has performed the step of verifying whether the tracking and tracked unit(s) have traveled a minimum pre-specified distance over the tracking period. For example, the Uber Platform included a trip table that included the location of the of the ride requesting Customer Application and ride accepting Driver Application at various time points along the pre-specified distance of the trip route between the pick-up location and the drop-off location from the start time and end time of the ride. The Uber Platform also included a trip verification component that compared the respective locations of the Driver Application and Customer Application at these time points along the trip route to verify that they tracked for the pre-specified distance between the pick-up location and the drop-off location during the time period of the ride. <i>See, Exhibits 6, 7, 11, 12, 13-18, 31, 46-58</i>

Upon information and belief, based upon the review to date the following components appear to be involved in providing the above-described functionality:

See, Exhibits SC-2, SC-4, SC-6, SC-9, SC-11, SC-12, and SC-13

Exhibit SC-14, shows the code functionality that tracks whether a minimum distance has been travelled between the Rider and Driver.

[REDACTED]

means to determine and report to the system upon request that, another mobile remote unit of the network has tracked the portable mobile remote over a period of time.	During the Relevant Time Period, the accused Uber Network included means to determine and report to the system upon request that, another mobile remote unit of the network has tracked the portable mobile remote over a period of time. For example, the Uber Platform created a trip table showing, amongst other things, the respective reported smartphone location of both the Driver Application and Customer Application during a trip. The Uber Platform included an on-trip component that used the respective location data from the trip table to determine whether the respective location of Customer Application and Driver Application tracked each other. Various components in the Uber Platform requested such verifications from the on-trip component for safety purposes and to confirm that the rider was in fact delivered from the pickup point to the destination point, for example to store such data or historical purposes, data mining or for any subsequent billing disputes. Upon information and belief, based upon the review to date the following components appear to be involved in providing the claimed functionality of determining and report to the system upon request that, another mobile remote unit of the network has tracked the portable mobile remote over a period of time: For example, <i>see Exhibits 51-58; SC-13, and SC-14</i>
'752 Patent, Claim 15	Infringement Contentions
The portable mobile remote according to claim 14, having means to further determine if location disclosure for the remote unit is prohibited at a specific geographic boundary before sending its location to the network.	During the Relevant Time Period, Uber made, used, offered, put into service and profited from a communication system in which the portable mobile remote included means to determine if location disclosure for the remote unit was prohibited at a specific geographic boundary before sending its location to the network.

Exhibit B

ENOVSYS v UBER

February 8, 2024

U.S. Patent No. 7,199,726

'726 Patent, Claim 1	Infringement Contention
(vi) means to determine and report to the system that, another portable mobile remote unit has maintained relative proximity to the portable mobile remote over a period of time while in motion.	During the Relevant Time Period, the Uber Network included means to determine and report to the system that, another portable mobile remote unit has maintained relative proximity to the portable mobile remote over a period of time while in motion. For example the Uber Platform included a location database that stored the location data of online Customer Applications and Driver Applications currently located in each S2 cell serviced by the Uber Networks. The Uber Platform included components that queried the location database to determine whether any given Customer or Driver Application maintained relative proximity over a period of time while in motion by setting appropriate parameters to the database query and the location database would report the results of query to the requestor. For example, as discussed above the match component queried the location database for reported locations of online Driver Applications in any given S2 cell (or set of S2 cells) that maintained relative proximity to a Customer Application that was requesting or planning a ride and the data and the location database reported the result of the query to the match component. Additionally, a surge price component queried the location database for Driver and Customer Applications currently located in any given S2 cell to determine whether to apply surge pricing within that S2 cell and the location database reported the results of the query to the surge price component. Additionally, the Uber Platform included a trip verification component that queried the location database to create an on-trip table. The on-trip table recorded the reported GPS location and other location data of the Customer Application of a customer making the ride request along with the GPS location and other location data of the Driver Application that accepted the ride request at various time and distance intervals during the trip from the pickup location to the drop-off location during the period of the trip. The tables were used by the Uber Platform to verify and report that that Driver Application and Customer Application maintained relative proximity at various time and distance intervals during the time period of the ride from the pickup location to the drop-off location.

Exhibit C

ENOVSYS v UBER

February 8, 2024

U.S. Patent No. 6,756,918

boundary obtained at the network;	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
means to determine and report to the system upon request that, another mobile remote unit of the network has tracked the portable mobile remote over a period of time.	During the Relevant Time Period, the accused Uber Network included means to determine and report to the system upon request that, another mobile remote unit of the network has tracked the portable mobile remote over a period of time. For example, the location store component could respond to location request from the match component to provide to the match component the location information for Driver Applications or Customer Applications that were currently located with a prescribed S2 cell or set of S2 cells in the coverage area of the Uber Network during the period of time that matches were being calculated.

	Additionally, the Uber Platform created a trip table showing, amongst other things, the respective reported smartphone location of both the Driver Application and Customer Application during a trip. The Uber Platform included an on-trip component that used the respective location data from the trip table to determine whether the respective location of Customer Application and Driver Application tracked each other. Various components in the Uber Platform requested such verifications from the on-trip component for safety purposes and to confirm that the rider was in fact delivered from the pickup point to the destination point, for example to store such data or historical purposes, data mining or for any subsequent billing disputes. Upon information and belief, based upon the review to date the following components appear to be involved in providing the claimed functionality of determining and report to the system upon request that, another mobile remote unit of the network has tracked the portable mobile remote over a period of time: For example, <i>see</i> Exhibits 51-58; SC-13, and SC-14
'918 Patent, Claim 2	Infringement Contentions
The portable mobile remote according to claim 1, having means to further determine if location disclosure for the remote unit is prohibited at a specific geographic boundary before sending its location information to the network.	During the Relevant Time Period, Uber made, used, offered, put into service and profited from a communication system in which the portable mobile remote included means to determine if location disclosure for the remote unit was prohibited at a specific geographic boundary before sending its location to the network. 

'726 Patent, Claim 2	Infringement Contentions
The portable mobile remote according to claim 1, having means to further determine if location disclosure for the remote unit is prohibited at a specific geographic boundary before sending its location information to the network.	During the Relevant Time Period, Uber made, used, offered, put into service and profited from a communication system in which the portable mobile remote included means to determine if location disclosure for the remote unit was prohibited at a specific geographic boundary before sending its location to the network. In particular, if either the location of an Uber Driver Application or Customer Application running on a smartphone or mobile remote unit is processed by the Uber Platform, and it is determined that the Application should no longer be online to disclose its location at that geographic location, the Application receives a message from the Uber Platform instructing it that it is not eligible to go online and disclose its location to the Platform. A command message is communicated to the Application at the portable mobile remote unit. Upon receiving the command message, the Application processes the message to determine whether it has been prohibited from going online to disclose location. Upon determining it should not go online, the Appt stops from periodically collecting and disclosing (sending) GPS data of the smartphone to Uber's platform. Upon information and belief, based upon the review to date the following components appear to be involved in providing the claimed functionality of determining if location disclosure for the remote unit is prohibited at a specific geographic boundary before sending its location to the network: For example, <i>see Exhibits 26, 27, 34-37, SC-6, SC-7, SC-8.</i>