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

SITEPRO, INC., Plaintiff, v. TANKLOGIX, LLC, Defendant.	**C.A. No. 6:24-CV-00642-XR-DTG** **JURY TRIAL DEMANDED**

PLAINTIFF SITEPRO, INC.'S PRELIMINARY INFRINGEMENT CONTENTIONS

Pursuant to this Court's Order Governing Proceedings in Patent Cases, Plaintiff SitePro, Inc. ("SitePro" or "Plaintiff") hereby makes the following preliminary infringement contentions with respect to U.S. Patent Nos. 8,649,909 (the "'909 Patent"), 9,898,014 (the "'014 Patent"), 11,175,680 (the "'680 Patent"), and 11,726,504 (the "'504 Patent") (the "Asserted Patents") on Defendant TankLogix, LLC ("TankLogix" or "Defendant").

In accordance with this Court's Order Governing Proceedings in Patent Cases, these infringement contentions are preliminary. Plaintiff's investigation is ongoing, and discovery has yet to commence. These disclosures are based on information available to Plaintiff at this time. Plaintiff reserves the right to supplement these disclosures as information becomes available. Plaintiff reserves the right to assert additional claims of the Asserted Patents, accuse different products, or find alternative literal and/or equivalent infringement elements in the accused products.

SitePro, Ex. 2003
TankLogix v. SitePro, IPR2025-00648

I. DISCLOSURE OF PRELIMINARY INFRINGEMENT CONTENTIONS PURSUANT TO THE ORDER GOVERNING PROCEEDINGS IN PATENT CASES

A. Asserted Claims

Defendants infringe the following claims of the Asserted Patents:

- **'909 Patent**: claims 1-21;
- **'014 Patent**: claims 1-23;
- **'680 Patent**: claims 1-20; and
- **'504 Patent**: claims 1-20.

B. Accused Products

TankLogix directly infringed and continues to directly infringe, under 35 U.S.C. § 271, literally and/or under the doctrine of equivalents, the Asserted Claims by manufacturing, using, selling, offering to sell, and/or importing into the United States the TankLogix Ignition-Hosted Automation System ("the Accused System").

TankLogix also indirectly infringes and continues to indirectly infringe, under 35 U.S.C. § 271(b), the Asserted Claims by actively inducing others to infringe. TankLogix specifically intended and was aware that the ordinary and customary use of the Accused System and other similar systems would infringe the Asserted Claims. TankLogix further took active steps to encourage end users to use and operate the Accused System and other similar systems, despite knowing of the Asserted Patents, in a manner it knew to directly infringe the Asserted Claims. Further, on information and belief, TankLogix provided product manuals and other technical information that cause its subscribers, customers, and other third parties to use and to operate the Accused System and other systems for their ordinary and customary use, such that TankLogix's customers and other third parties have directly infringed the Asserted Patents, through the normal

and customary use of the Accused System and other similar systems. In addition, TankLogix implements or assists customers in implementing the Accused System at customer facilities, such as oil and gas well facilities, saltwater disposal facilities, or other facilities, with knowledge and intent that these customers would use the Accused System to infringe the Asserted Claims.

The Accused System infringes the patents SitePro obtained to protect its revolutionary, award-winning, proprietary advanced IoT and control platform that allows organizations to monitor, control and analyze critical infrastructure in real-time.

A chart identifying specifically where each limitation of each Asserted Claim is found within each Accused Product is attached to this disclosure as Exhibits A-D. Based on Plaintiff's good faith belief, the citations in the claim charts are representative of the Accused System. Where Plaintiff cites to sections representing a certain version or aspect of the Accused System, that citation is representative of all other versions or aspects including all prior and future versions unless otherwise noted. Plaintiff reserves the right to amend these claim charts, as well as other information contained in this document and exhibits hereto, to incorporate new information learned during the course of discovery.

C. Priority Date of Each Asserted Claim

Each of the asserted claims of the Asserted Patents are entitled to a priority date at least as early as identified below. Plaintiff reserves the right to establish an earlier date of invention based upon actions relating to conception and reduction to practice of the claimed inventions.

- Each asserted claim of the '909 Patent is entitled to a priority date at least as early as February 2012.
- Each asserted claim of the '014 Patent is entitled to a priority date at least as early as February 2012.

- Each asserted claim of the ’680 Patent is entitled to a priority date at least as early as February 2012.
- Each asserted claim of the ’504 Patent is entitled to a priority date at least as early as February 2012.

D. Documents Evidencing Conception and Reduction to Practice and File Histories for the Asserted Patents

Currently available, non-privileged documents that relate to the conception and/or reduction to practice of the Asserted Patents, including the file histories of the Asserted Patents are being produced at SITEPRO_0000001- SITEPRO_0004456. To the extent any privileged documents related to conception and/or the reduction of practice exist they will be logged at a time mutually agreed to by the parties for privilege log exchanges. Plaintiff is continuing its investigation and reserves the right to amend and/or supplement its production as those documents are located.

Dated: April 11, 2025

Respectfully submitted,

/s/ *M. Craig Tyler*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via email on this the11th day of April, 2025, upon the Defendants' counsel of record.

/s/ *M. Craig Tyler*
M. Craig Tyler

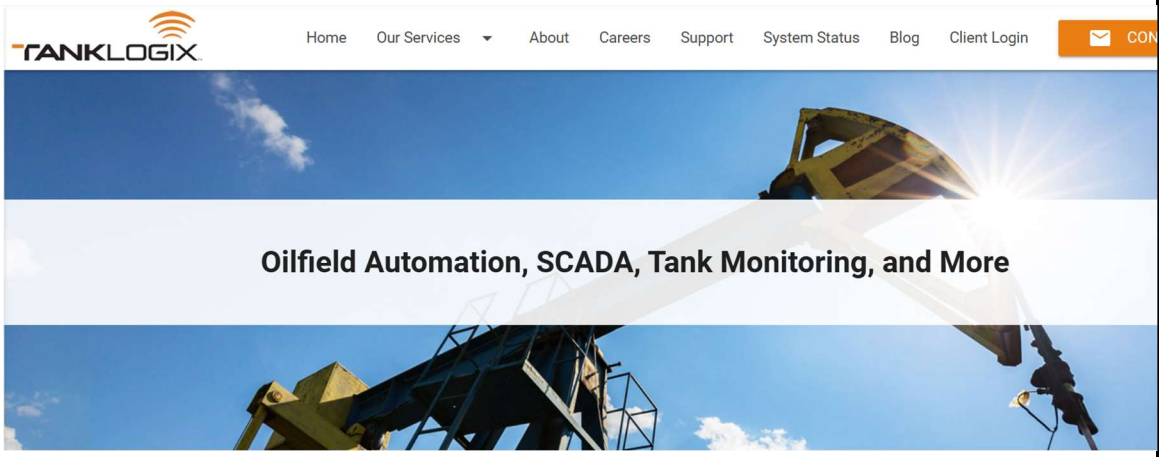
Exhibit A

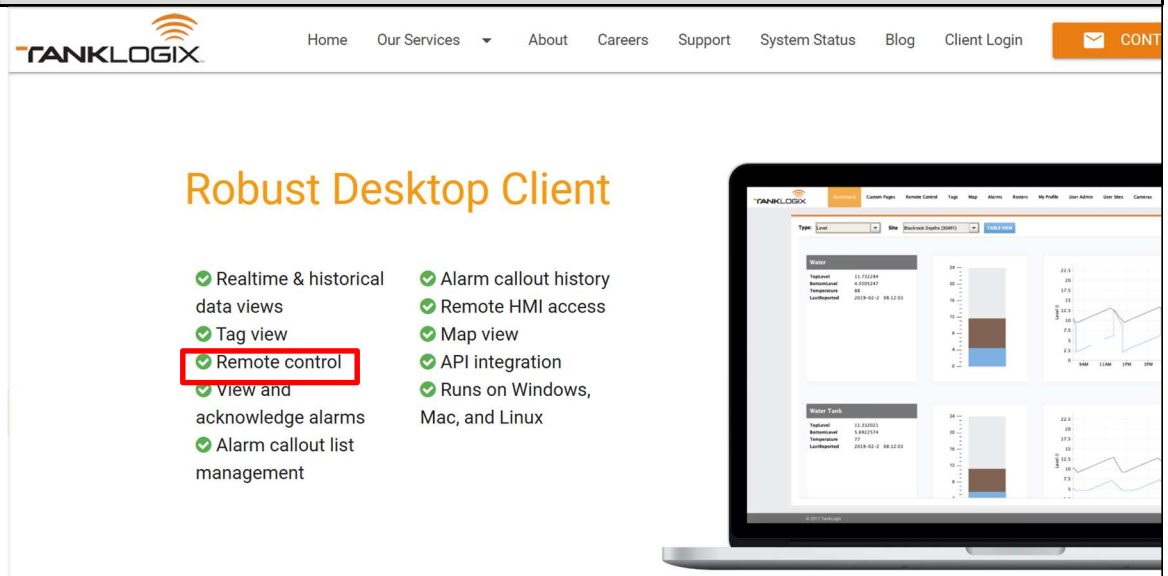
Infringement Analysis of U.S. Patent No. 8,649,909 Against the TankLogix Ignition-Hosted Automation System Implemented by TankLogix LLC ("TankLogix")

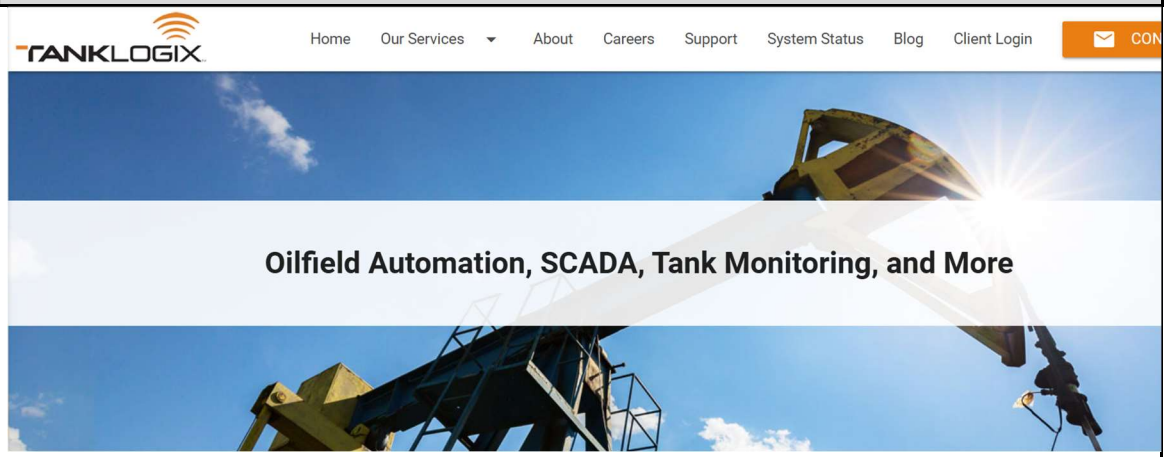
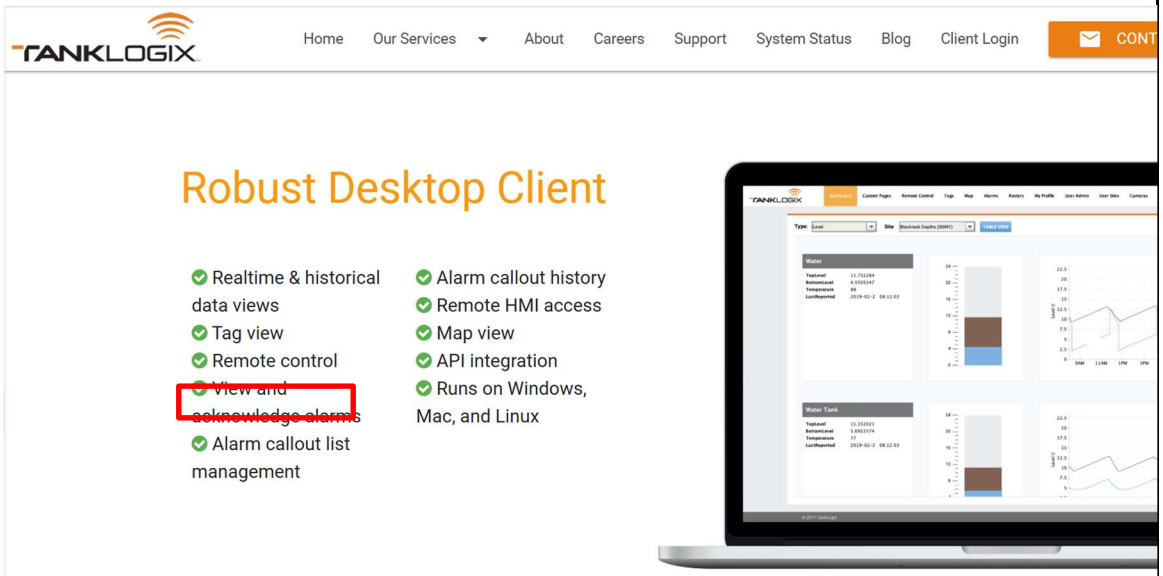
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System(s) each element of claims 1-21 of U.S. Patent No. 8,649,909 (the "'909 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed and implemented by TankLogix, LLC.

References Cited:

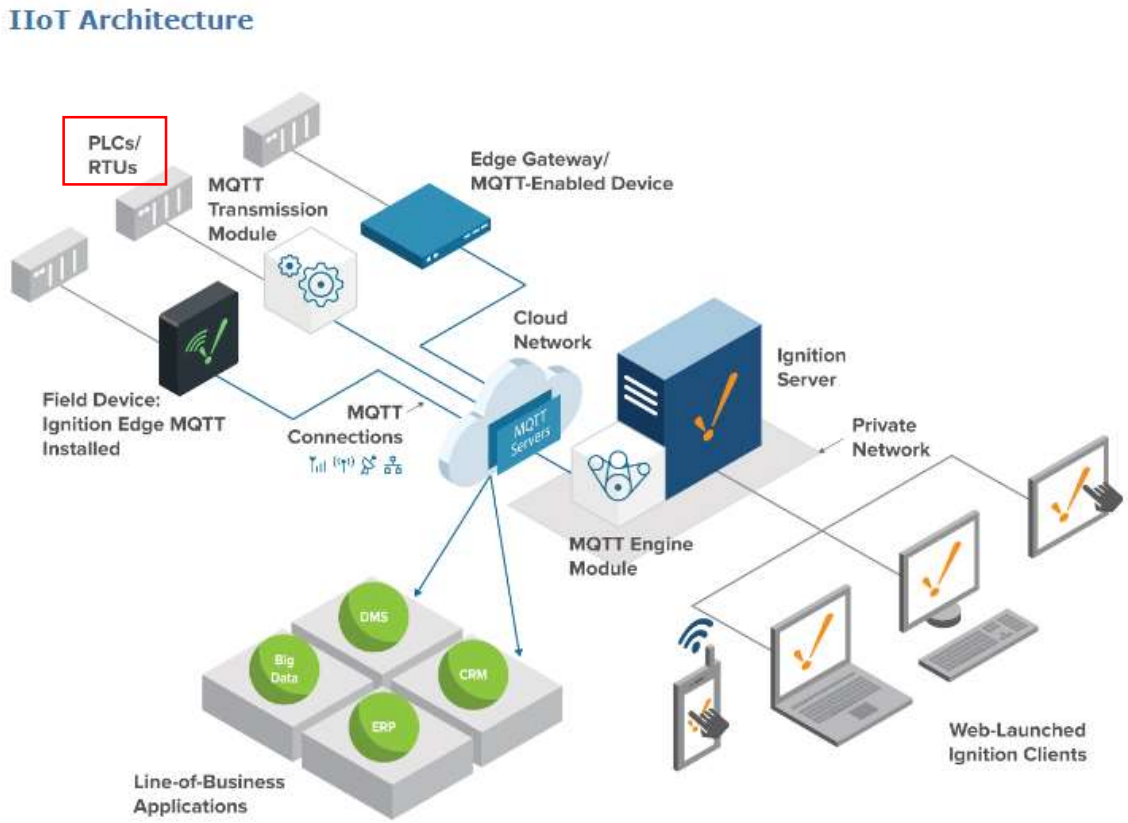
- Exhibit 1, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 2, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 3, https://www.tanklogix.com/vfd-controls-and-motors/.
- Exhibit 4, https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition.
- Exhibit 5, https://tanklogix.com/tank-monitoring/benefits.
- Exhibit 6, https://www.tanklogix.com/.
- Exhibit 7, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 8, https://www.docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge/edge-gateway/configuring-sync-services#data-synchronization.
- Exhibit 9, https://www.docs.inductiveautomation.com/docs/8.1/ignition-modules/perspective/working-with-perspective-components/component-events-and-actions.
- Exhibit 10, https://www.docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge.
- Exhibit 11, https://www.docs.inductiveautomation.com/docs/8.1/appendix/scripting-functions/system-security/system-security-validateUser.

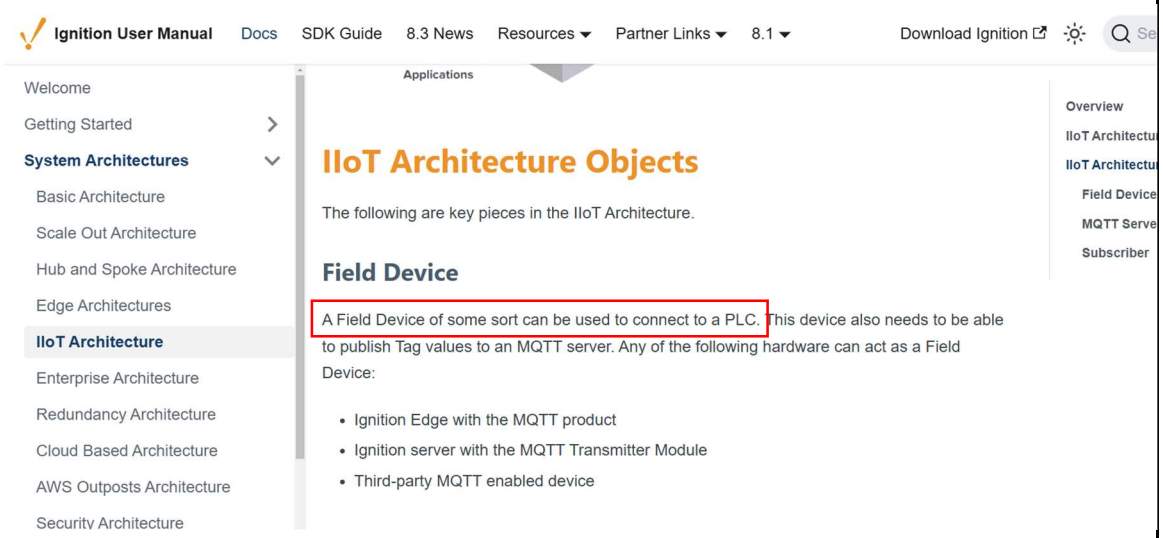
U.S. Patent No. 8,649,909	The Accused System
Claim 1	
[1.1] A system for remotely controlling a fluid-handling device of an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station, the system comprising:	Regardless of whether the preamble limit the scope of the claim, the Accused System includes a system for remotely controlling a fluid-handling device of an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station. *See, e.g.*:  Exhibit 6.

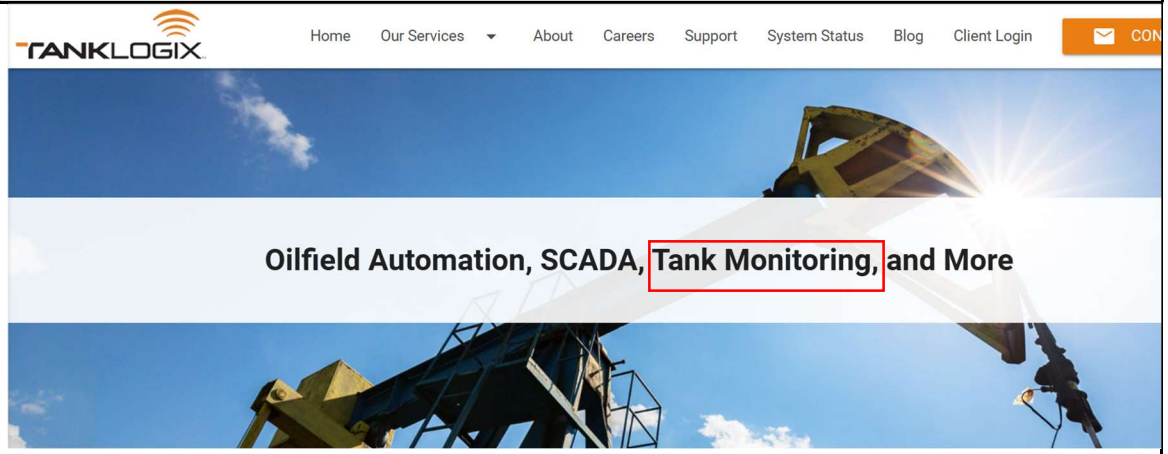
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents.
[1.2] a command-center server having a data store storing multiple user accounts, each user account corresponding to a set of one or more oil wells, petro water disposal or re-injection facilities, or petroleum pumping stations, or a combination thereof, each set being operated by a different entity corresponding to the respective user account; and	The Accused System has a command-center server having a data store storing multiple user accounts, each user account corresponding to a set of one or more oil wells, petro water disposal or re-injection facilities, or petroleum pumping stations, or a combination thereof, each set being operated by a different entity corresponding to the respective user account. *See, e.g.*:

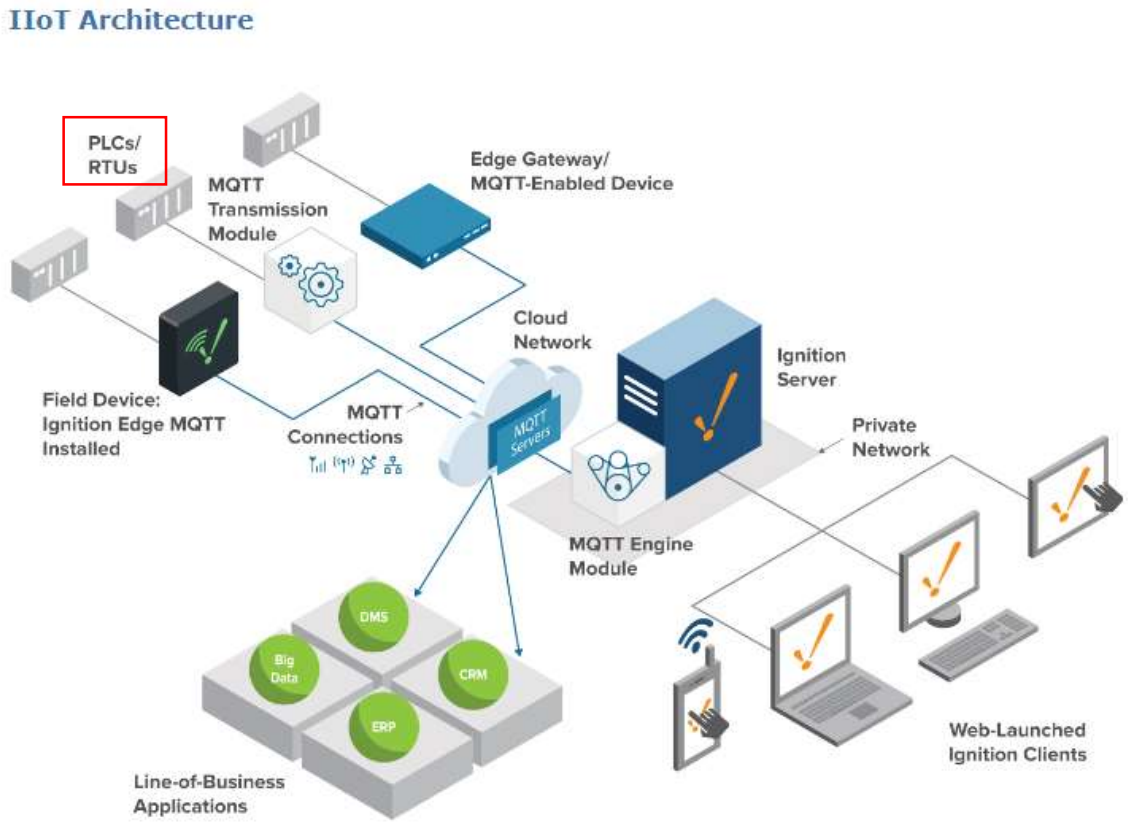
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 6.  Exhibit 1 (annotated).

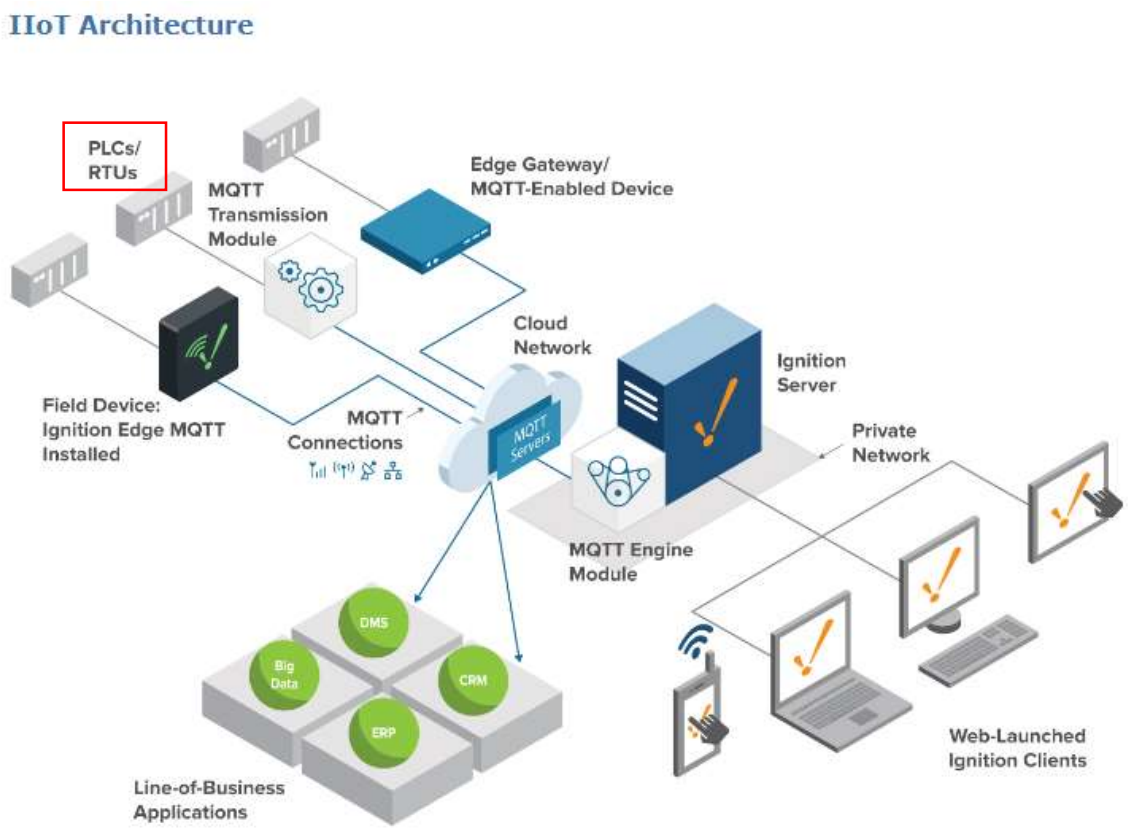
U.S. Patent No. 8,649,909	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.3] a plurality of geographically distributed site master controllers, each site master controller corresponding to a respective one of the oil wells, petro water disposal or re-injection facilities, or petroleum pumping stations, each site master controller comprising:	The Accused System has a plurality of geographically distributed site master controllers, each site master controller corresponding to a respective one of the oil wells, petro water disposal or re-injection facilities, or petroleum pumping stations. *See, e.g.*:

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. A PLC is an example of such a "geographically distributed site master controller," corresponding to a "petro water disposal or re-injection facility[y]." The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

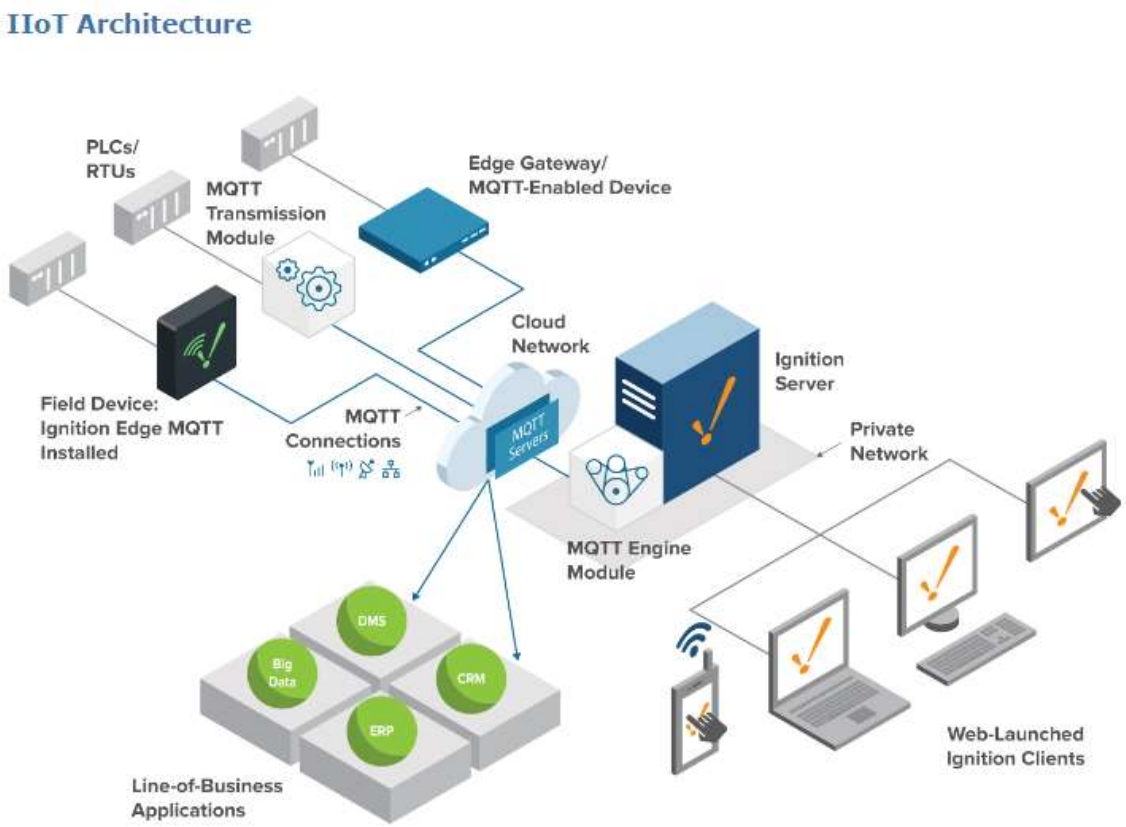
U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.4] a communication module operable to communicate with a plurality of fluid-handling devices;	The Accused System has a communication module operable to communicate with a plurality of fluid-handling devices. *See, e.g.*:  Exhibit 2.

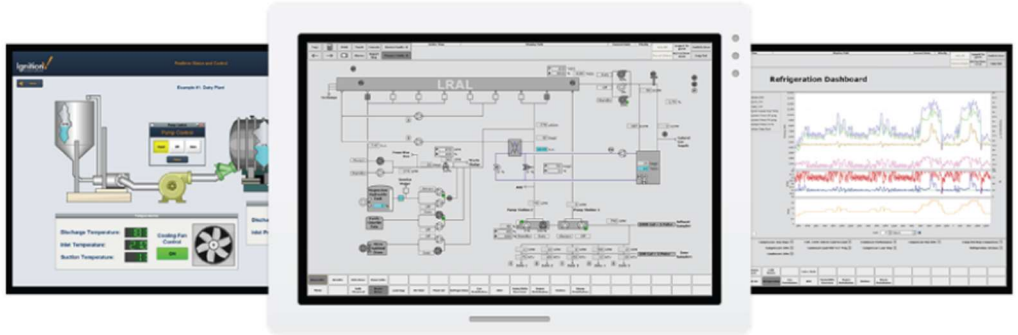
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 6. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.5] a network interface;	The Accused System has a network interface. *See, e.g.*:

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. The PLC necessarily has a network interface to communicate both to the remote command-center server and to the various networked devices local to the site. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

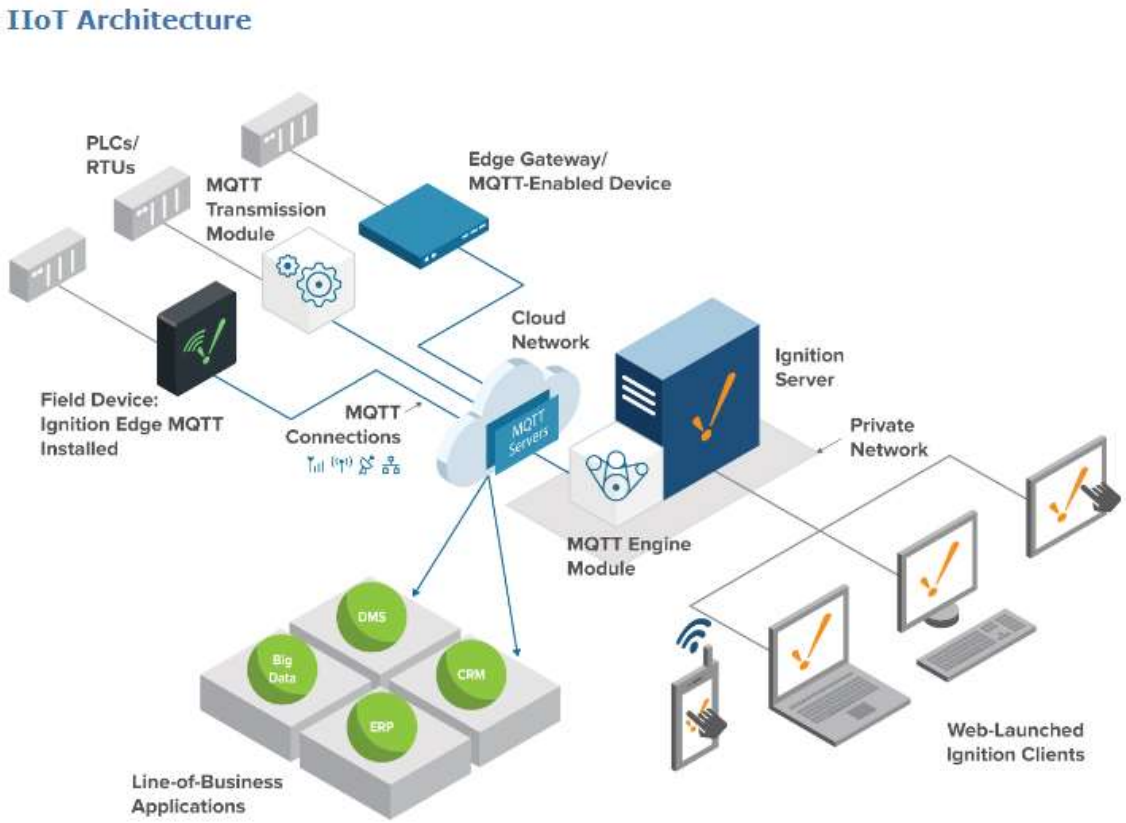
U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.6] memory; and	The Accused System has a memory. *See, e.g.*:  Exhibit 2. PLCs contain memory to run the programs to manage the SCADA system on-site.

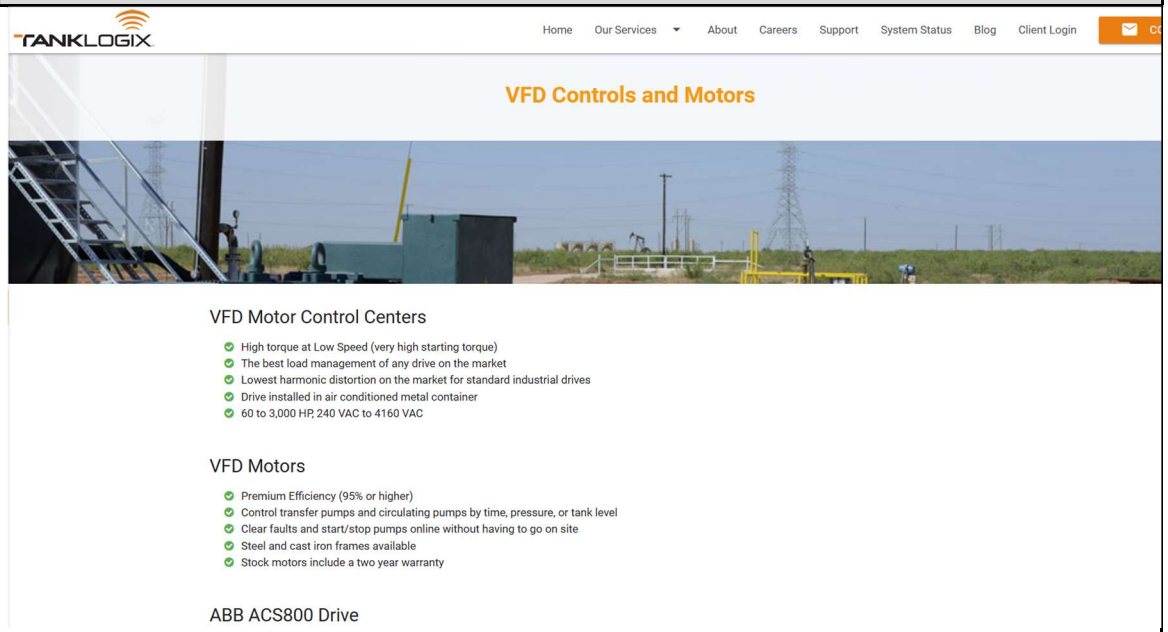
U.S. Patent No. 8,649,909	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.7] one or more processors communicatively coupled to the communication module, the network interface, and the memory, wherein the memory stores instructions that when executed by the processors cause the processors to effectuate steps comprising:	The Accused System has one or more processors communicatively coupled to the communication module, the network interface, and the memory, wherein the memory stores instructions that when executed by the processors cause the processors to effectuate steps. *See, e.g.*: In the Accused Product, the PLC has at least one processor coupled to the communication module, the network interface, and the memory to run the programs stored in the memory. *See, e.g.*, claim elements 1.4, 1.5, 1.6 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.8] receiving, via the network interface, from the command-center server, a plurality of commands encoded in a first protocol to control	The Accused System receives, via the network interface, from the command-center server, a plurality of commands encoded in a first protocol to control the fluid-handling devices from a user corresponding to one of the user accounts, different commands

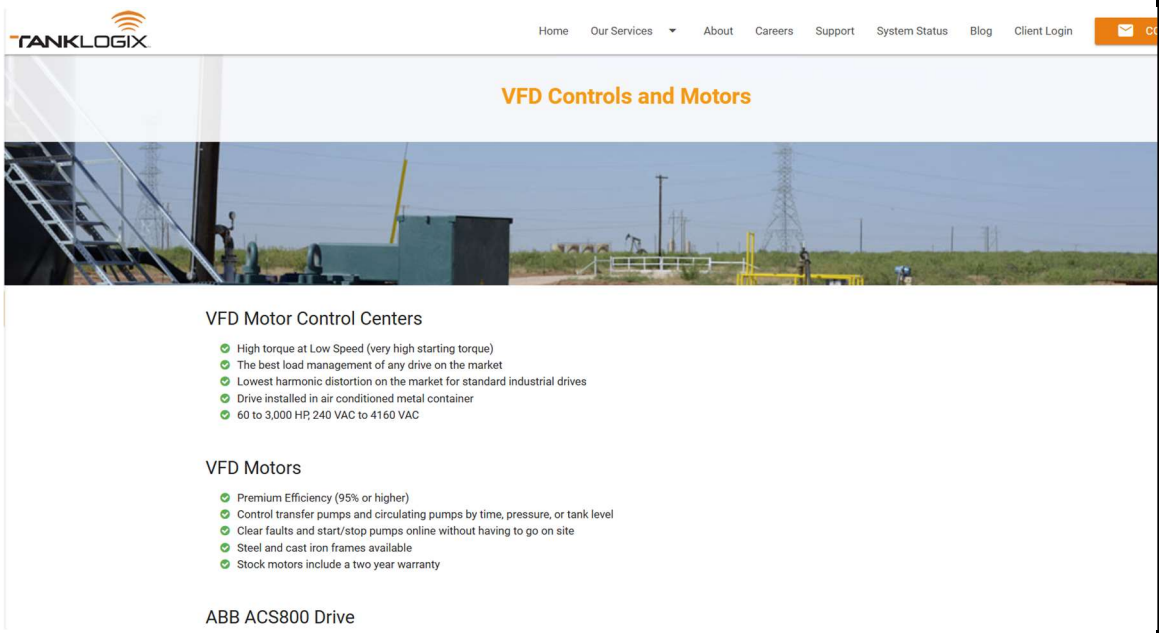
U.S. Patent No. 8,649,909	The Accused System
the fluid-handling devices from a user corresponding to one of the user accounts, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices;	among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices. *See, e.g.*:  Exhibit 2.

U.S. Patent No. 8,649,909	The Accused System
	Web-based HMI and SCADA applications deployment Using web technologies, you can access PLCs and connect to SQL databases on any platf Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient v Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See manage your entire system from one place.  Exhibit 4. *See also* claim elements 1.1, 1.2, 1.3, above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

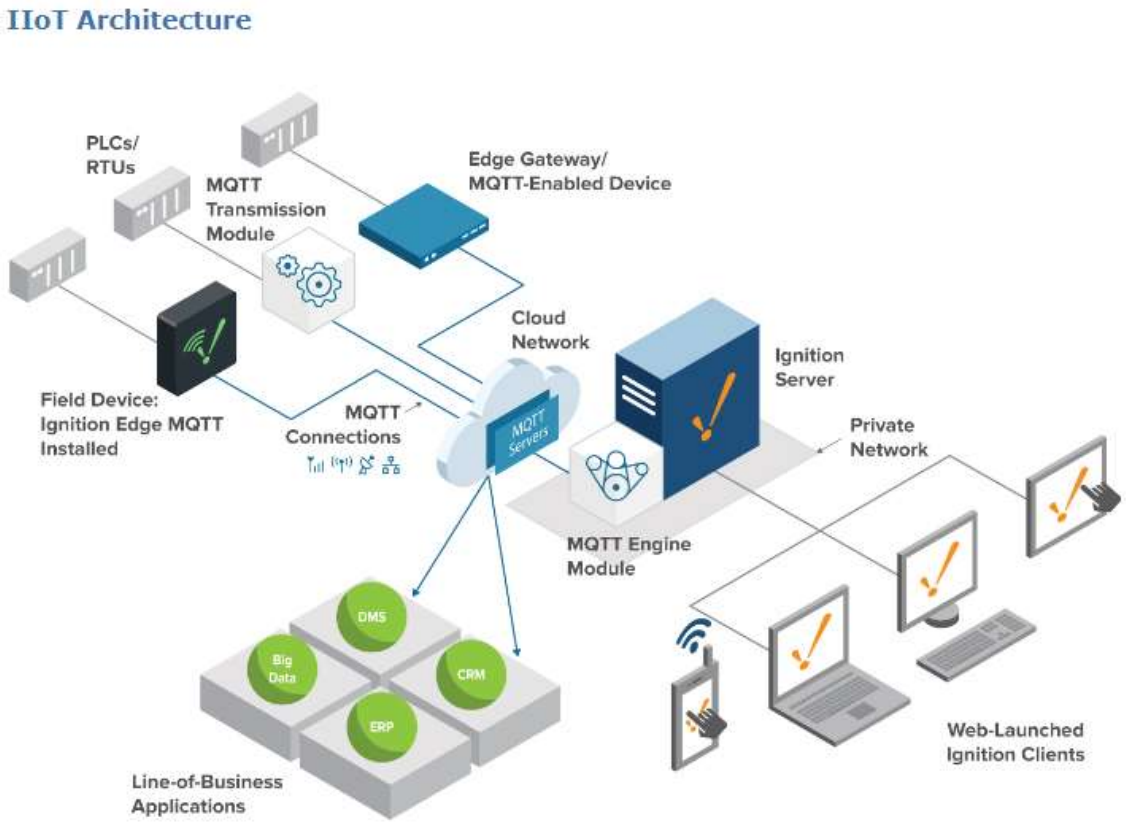
U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.9] for at least some of the plurality of commands, determining a plurality of different target states of a given one of the fluid-handling devices over time, wherein the respective site-master controller is operative to maintain control of the fluid handling devices in the absence of a network connection to the command-center server;	The Accused System has for at least some of the plurality of commands, determining a plurality of different target states of a given one of the fluid-handling devices over time, wherein the respective site-master controller is operative to maintain control of the fluid handling devices in the absence of a network connection to the command-center server. *See, e.g.*:

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.

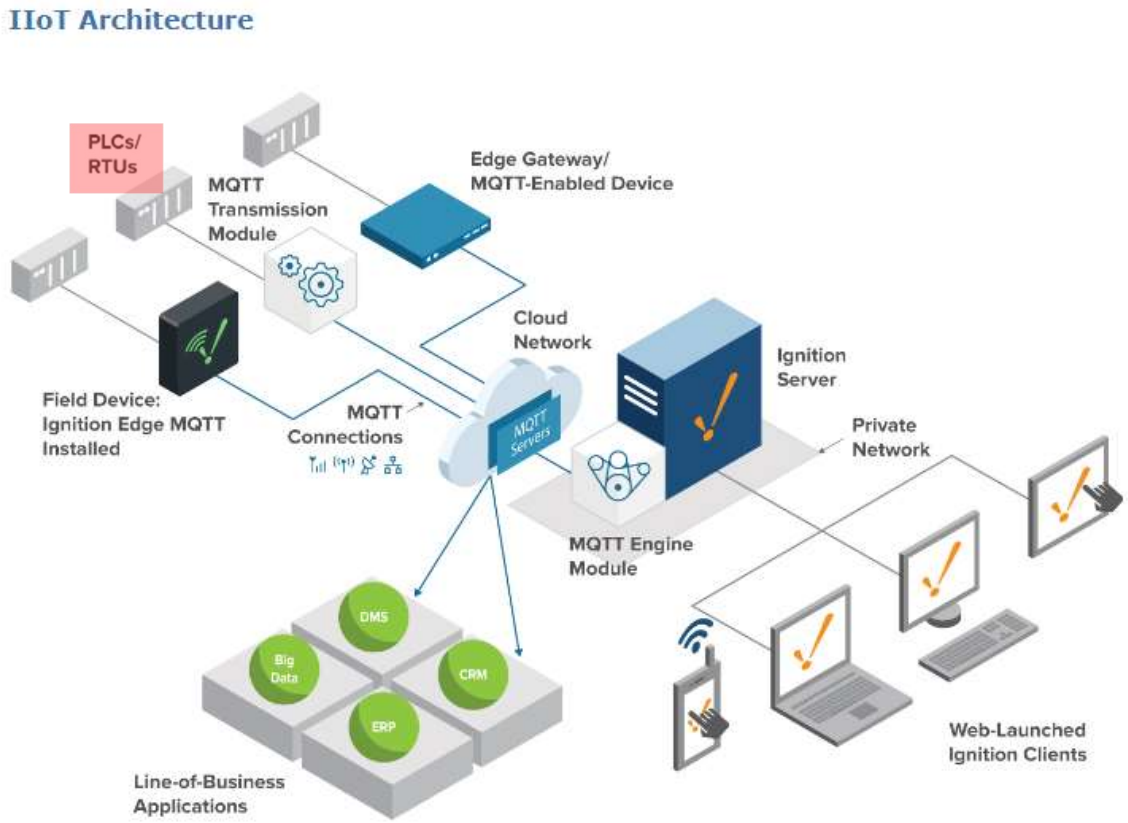
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 3. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.10] translating the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, each	The Accused System translates the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, each translated command being translated into a protocol among the plurality of protocols suitable for a fluid-handling device to which the respective command is directed, the at least some of

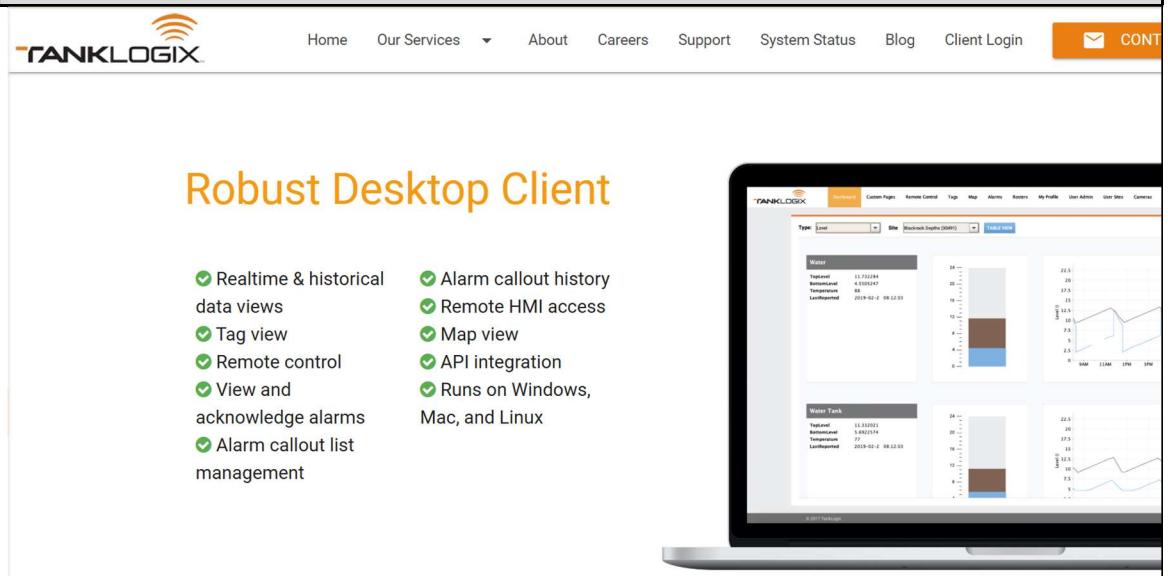
U.S. Patent No. 8,649,909	The Accused System
translated command being translated into a protocol among the plurality of protocols suitable for a fluid-handling device to which the respective command is directed, the at least some of the translated command being operative to cause a local controller of the given fluid-handling device to drive the given fluid-handling device to the plurality of different target states, the local controller being responsive to the translated commands and feedback from the given fluid-handling device indicative of whether the given fluid-handling device is in a targeted state; and	the translated command being operative to cause a local controller of the given fluid-handling device to drive the given fluid-handling device to the plurality of different target states, the local controller being responsive to the translated commands and feedback from the given fluid-handling device indicative of whether the given fluid-handling device is in a targeted state. *See, e.g.*: The local controller is, for example, a variable-frequency drive (VFD). For example, the facility includes a fluid-handling device (e.g., pump with an actuator) and a motor powered by a VFD:  Exhibit 3. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices.

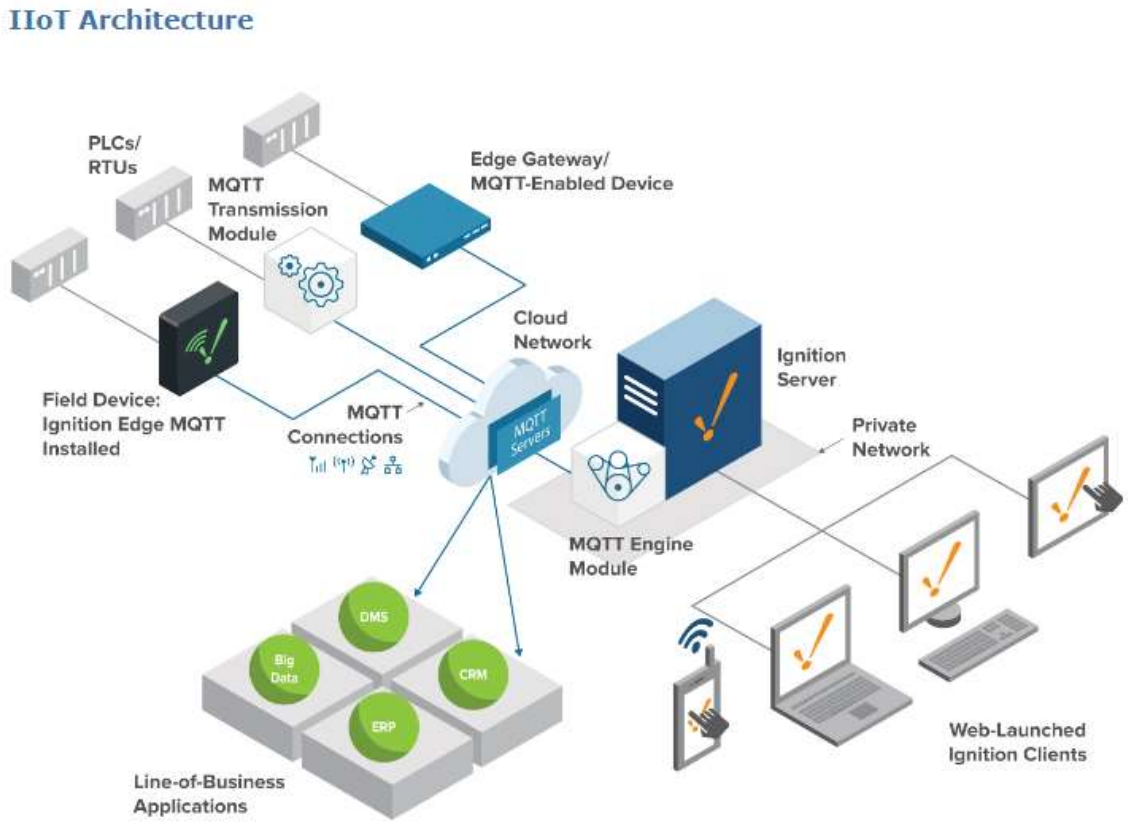
U.S. Patent No. 8,649,909	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.11] sending the translated commands to respective local controllers of the respective fluid-handling devices to which the respective commands are directed.	The Accused System sends the translated commands to respective local controllers of the respective fluid-handling devices to which the respective commands are directed. *See, e.g.*:

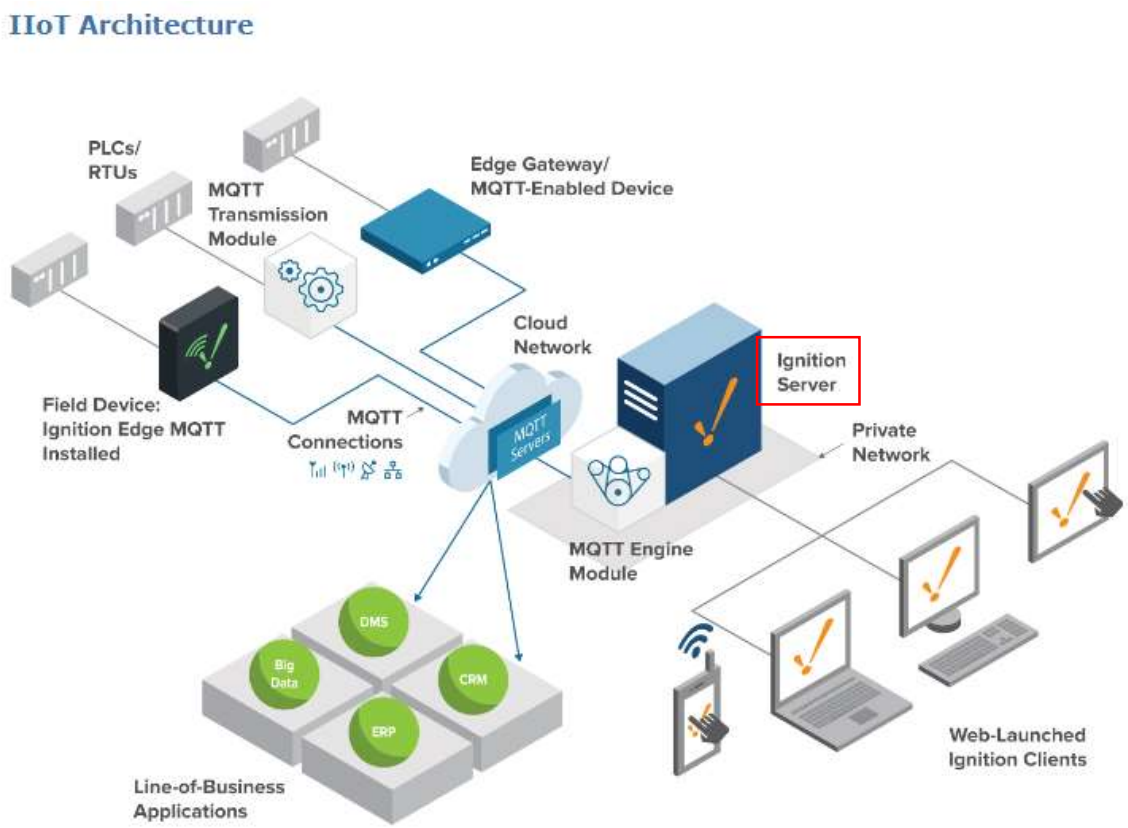
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. For example, on information and belief, the PLCs receive commands in a protocol such as TCP/IP, received via, for example, a TCP/IP connection, and then send the commands to the fluid-handling devices to which the respective commands are directed via the appropriate protocol. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 8,649,909	The Accused System
	insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 2	
[2.1] The system of claim 1, wherein the memory also stores instructions that when executed by the processors cause the processors to effectuate steps comprising:	The Accused System comprises memory also stores instructions that when executed by the processors cause the processors to effectuate steps. *See, e.g.*: *See, e.g.*, claim 1.6 and 1.7 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[2.2] receiving, from the fluid-handling device, sensor data indicative of the operation of the fluid-handling device obtained by sensors of the fluid-handling device; and	The Accused System receives from the fluid-handling device, sensor data indicative of the operation of the fluid-handling device obtained by sensors of the fluid-handling device. *See, e.g*: The PLCs in the Accused System have at least one processor coupled to the communication module, the network interface, and the memory to run the programs stored in the memory. This processor is further configured to obtain data from the sensors at the facilities via the network connections.

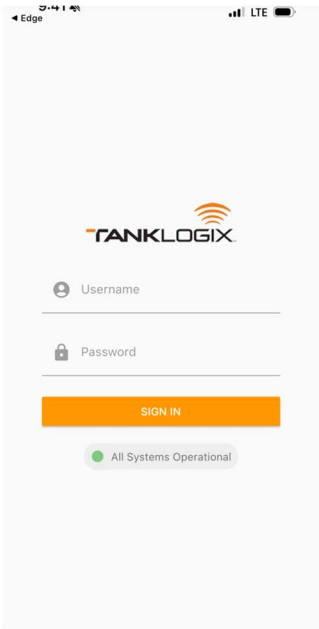
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. As shown in the example below, the processors (e.g., PLCs) access a sensor to measure a fluid being handled by the fluid-handling device (e.g., Realtime & historical data views):

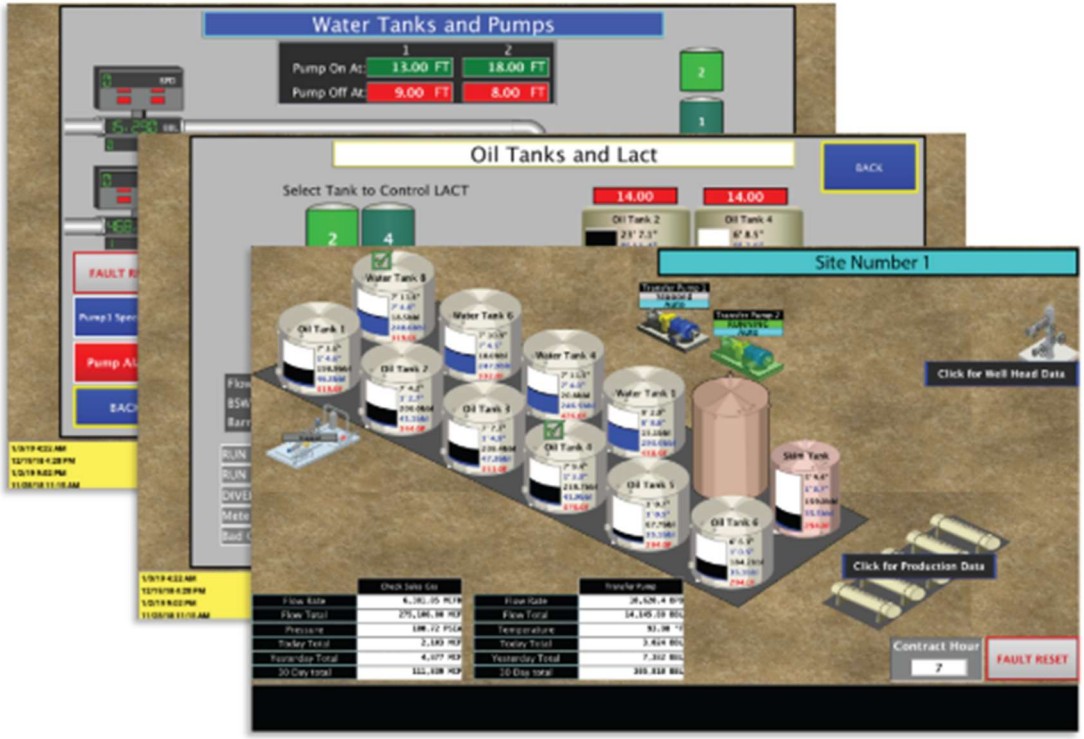
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[2.3] sending, to a remote data store, the received sensor data.	The Accused System sends, to a remote data store, the received sensor data. *See, e.g.*:

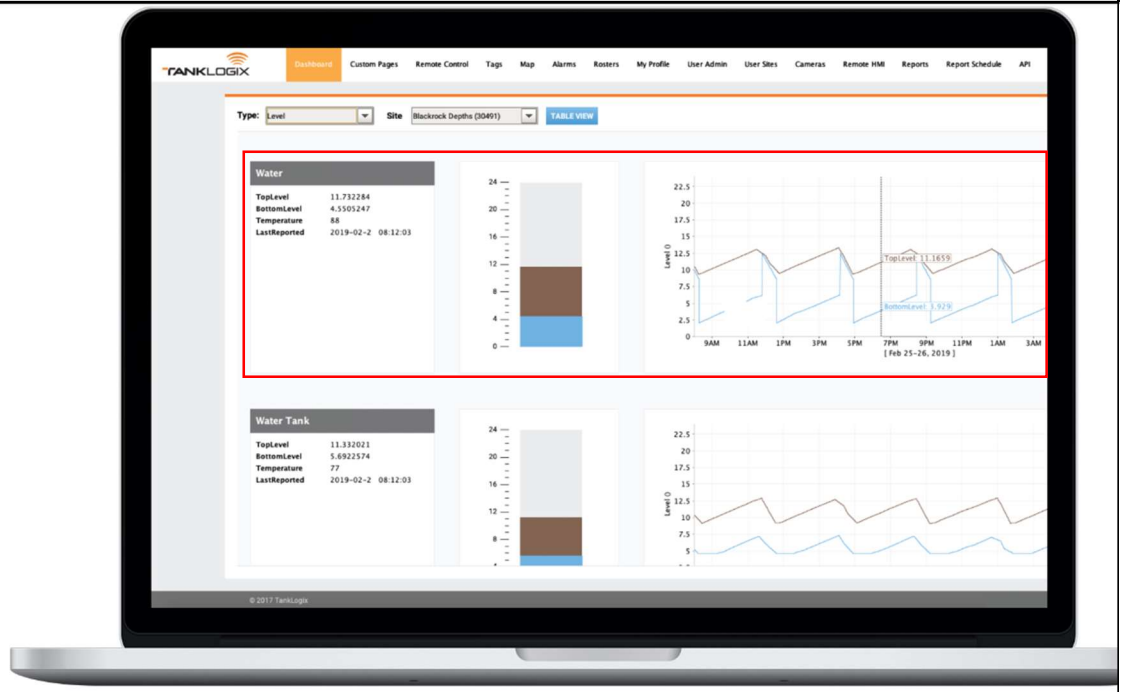
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. The processors in the Accused System send sensor data to a remote data store (e.g., the Ignition server). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

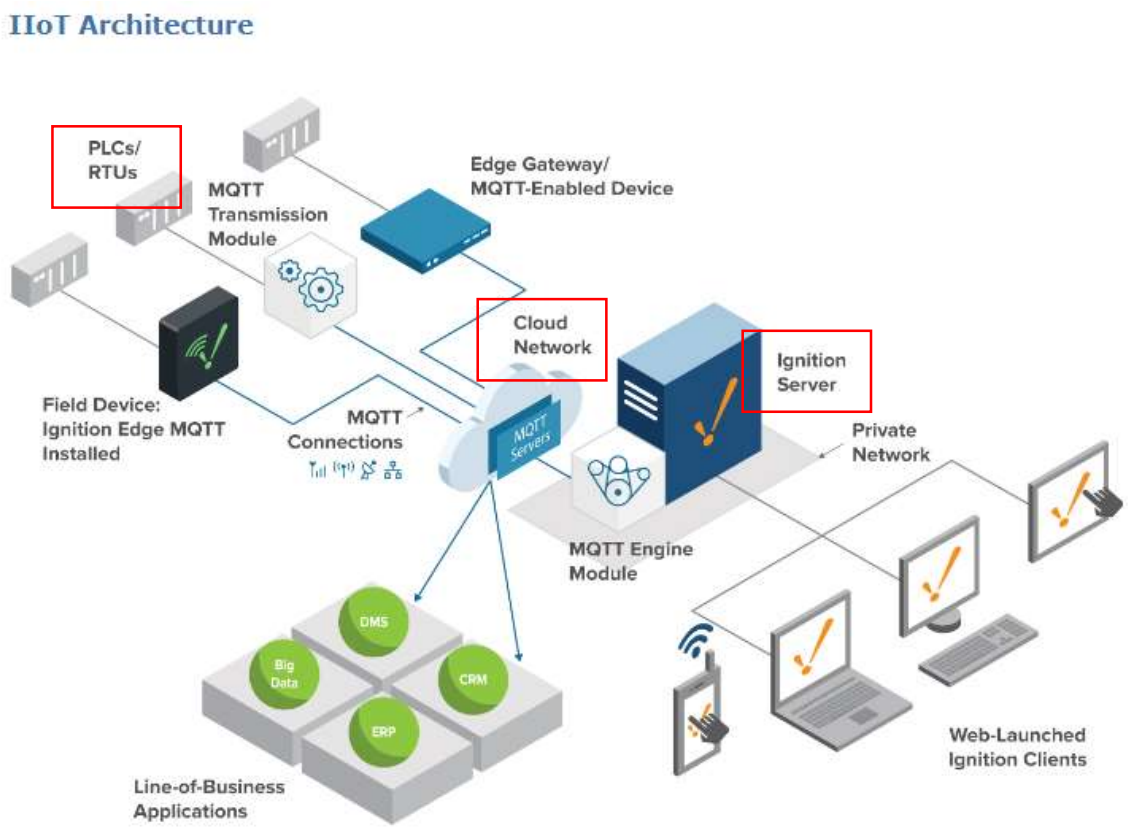
U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 3	
[3.1] The system of claim 2, comprising the remote data store and a web-server, wherein the web-server is operative to perform steps comprising:	The Accused System comprises the remote data store and a web-server. *See, e.g.*: *See, e.g.*, claim element 1.8 and claim 2 above. 

U.S. Patent No. 8,649,909	The Accused System
	Exhibit 2. The Ignition Server in the Accused System comprises a web server that supports web-launched Ignition Clients, as shown in the above diagram. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[3.2] receiving, from a user device, a password corresponding to a selected one of the user accounts;	The Accused System receives, from a user device, a password corresponding to a selected one of the user accounts. *See, e.g.*: The Ignition manual indicates the software validates users by obtaining credentials, like a password, as indicated in the excerpt below (highlighting added). Exhibit 11.

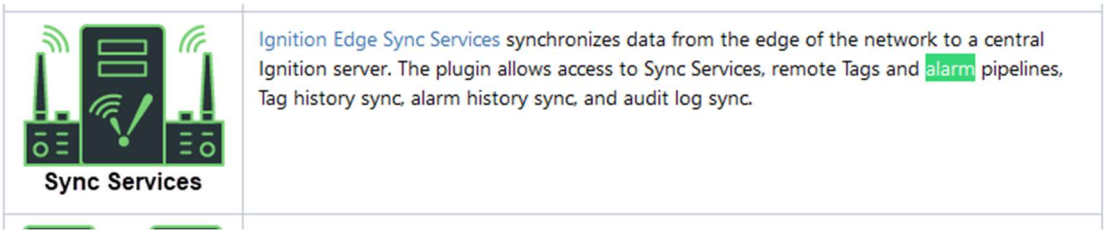
U.S. Patent No. 8,649,909	The Accused System
	As shown in the example below from the TankLogix mobile application, the Accused System further comprises obtaining, with the server system, credentials from a first client computing device:  The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[3.3] receiving, from the user device, a request for a data indicative of the	The Accused System receives, from the user device, a request for a data indicative of the operation of an oil well, a petro water disposal or re-injection facility, or a petroleum

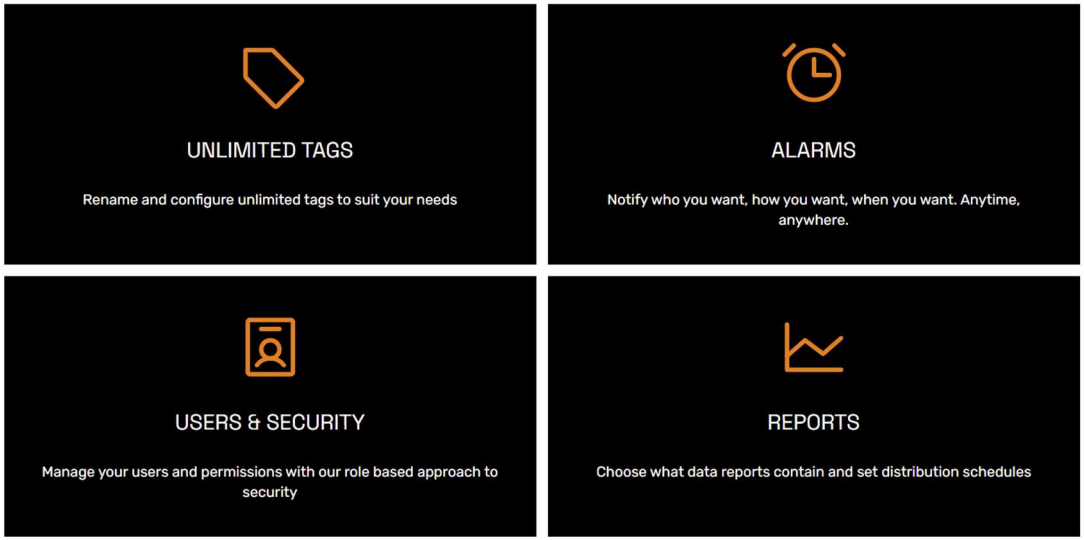
U.S. Patent No. 8,649,909	The Accused System
operation of an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station coupled to the fluid-handling device of the selected one of the user accounts;	pumping station coupled to the fluid-handling device of the selected one of the user accounts. *See, e.g.*: 

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 1. As shown in the above figures, in the Accused System, a user device requests data pertaining to the operation of fluid-handling devices, such as tanks or pumps, at oil wells or petro water disposal facilities, in order to populate the screens shown in the figures. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[3.4] retrieving, from the data store, data responsive to the request from the user device; and	The Accused System retrieves, from the data store, data responsive to the request from the user device. *See, e.g.*: *See* claim element 3.3 above. 

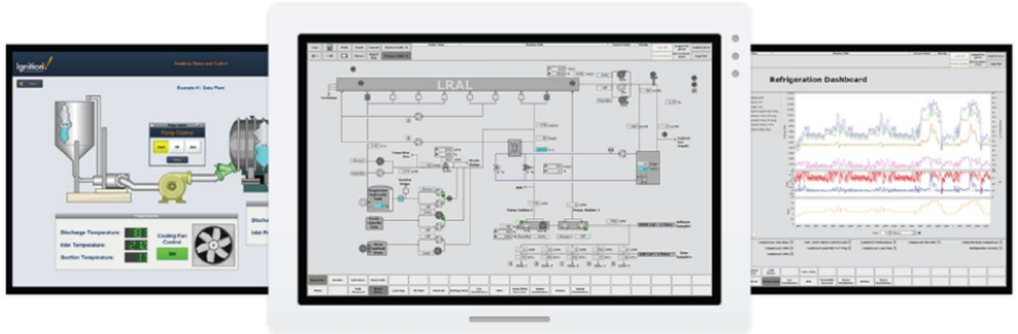
U.S. Patent No. 8,649,909	The Accused System
	Exhibit 2. The Ignition Server shown above retrieves data responsive to the request from a user device (e.g., Web-Launched Ignition Clients) from the data store in order to provide the requested data to the user device. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[3.5] sending, to the user device, the retrieved data for presentation to the user.	The Accused System sends, to the user device, the retrieved data for presentation to the user. *See, e.g.*: *See* claim elements 3.3 and 3.4 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 4	
[4] The system of claim 3, wherein the request is a request for data indicative of an amount of oil or other type of fluid extracted from, or injected into, an oil well, a petro water disposal or re-	In the Accused System, the request is a request for data indicative of an amount of oil or other type of fluid extracted from, or injected into, an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station to which the fluid-handling device is

U.S. Patent No. 8,649,909	The Accused System
injection facility, or a petroleum pumping station to which the fluid-handling device is coupled, and wherein the retrieved data comprises data indicative of the amount of oil, produced fluid, or flowback fluid.	coupled, and wherein the retrieved data comprises data indicative of the amount of oil, produced fluid, or flowback fluid. *See, e.g.*: *See, e.g.*, claims 1 and 3 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 5	
[5] The system of claim 3, wherein the request is a request to view alarms issued by a fluid-handling device among the plurality of fluid handling devices, and wherein the retrieved data comprises data indicative of the alarms.	In the Accused System, the request is a request to view alarms issued by a fluid-handling device among the plurality of fluid handling devices, and wherein the retrieved data comprises data indicative of the alarms. *See, e.g.*: "Alarm Journal - The alarm journal will store all alarm events locally for one week of events. There are limited configuration options; the Alarm Journal can be accessed via the Edge Alarm Journal profile. The Edge alarm journal and audit log can sync under EAM." Exhibit 10. 

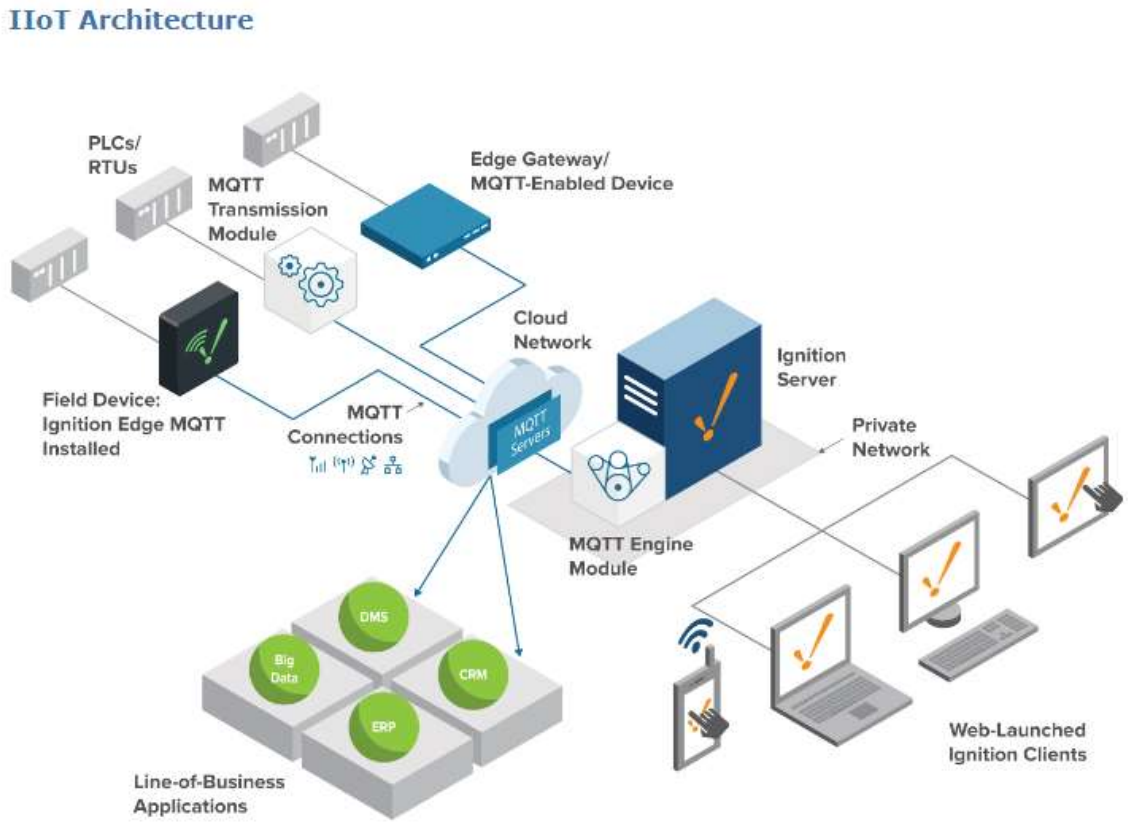
U.S. Patent No. 8,649,909	The Accused System
	Exhibit 10.  Exhibit 1. *See also* claims 1 and 3 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

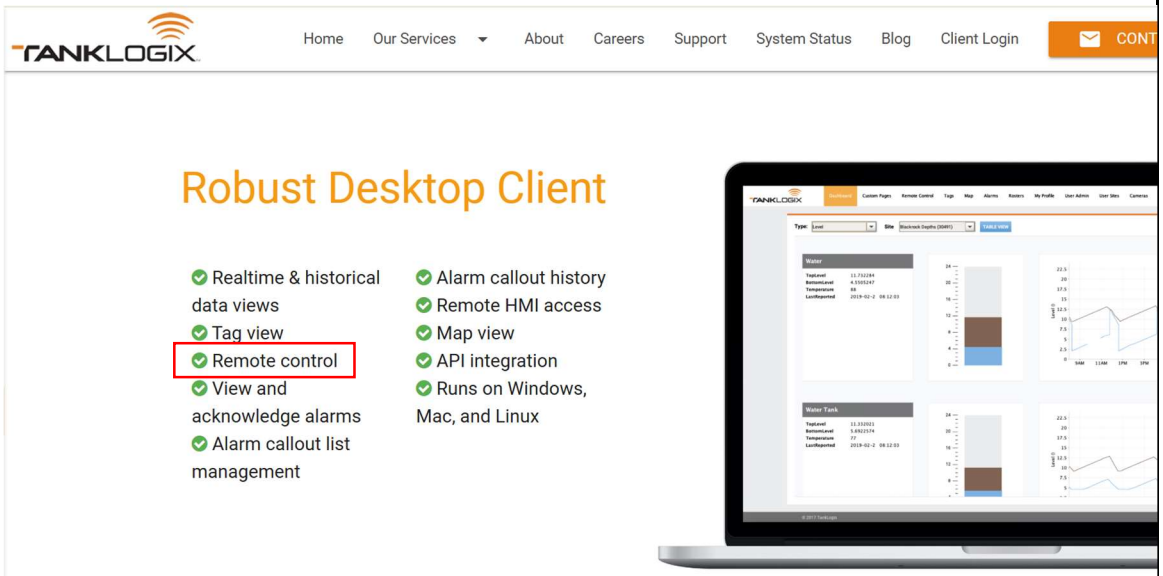
U.S. Patent No. 8,649,909	The Accused System
Claim 6	
[6] The system of claim 3, wherein the retrieved data comprises messages provided to the web-server regarding attempts to address the alarms.	In the Accused System, the retrieved data comprises messages provided to the web-server regarding attempts to address the alarms. *See, e.g.*: *See* claim 5 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 7	
[7.1] The system of claim 2, comprising the remote data store and a web-server, wherein the web-server is operative to perform steps comprising:	The Accused System comprises a remote data store and a web-server, wherein the web-server is operative to perform steps. *See, e.g.*: *See* claims 2 and 3 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

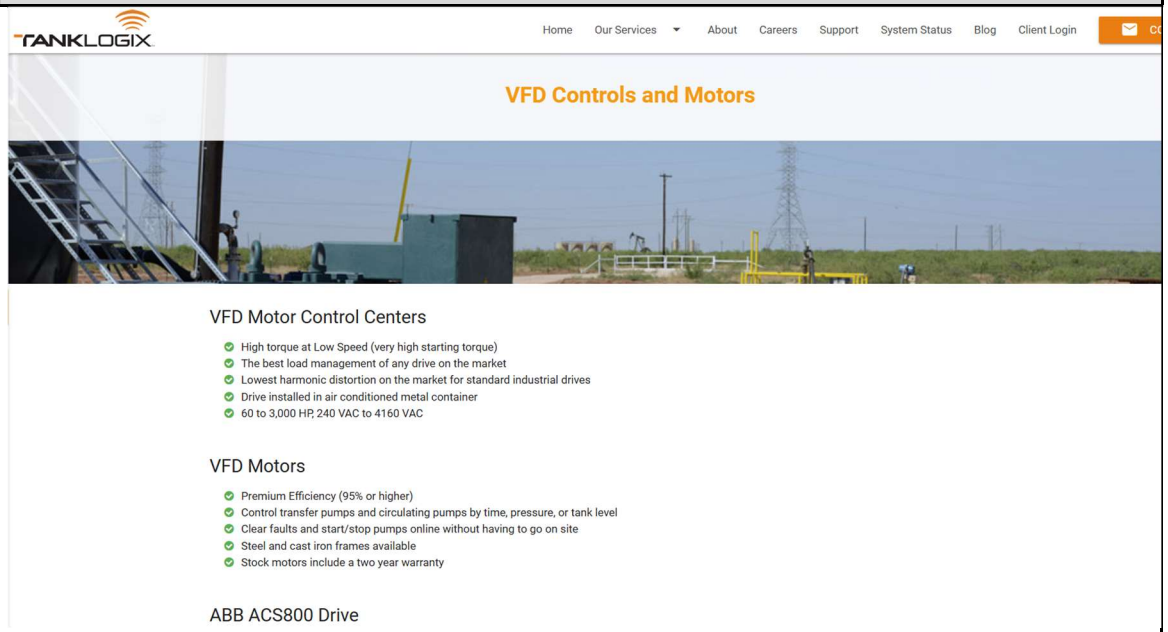
U.S. Patent No. 8,649,909	The Accused System
[7.2] receiving, from a user device, the command to change the state of the fluid-handling device; and	The Accused System comprises receiving, from a user device, the command to change the state of the fluid-handling device. *See, e.g.*: *See* claims 1.8, 1.9. 1.10 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[7.3] determining a network address of the network interface of the respective site master controller; and	The Accused System determines a network address of the network interface of the respective site master controller. *See, e.g.*: The web-server (e.g., Ignition Server) determines a network address for the site master controller (e.g., PLC) using a datastore such as the SQL databases described in the Ignition User Manual:

U.S. Patent No. 8,649,909	The Accused System
	Web-based HMI and SCADA applications deployment # Using web technologies, you can access PLCs and connect to SQL databases on any platf Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient v Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See manage your entire system from one place.  Exhibit 4. *See also* claim 1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[7.4] sending the command to the network interface.	The Accused System sends the command to the network interface. *See, e.g.*: *See* claim 7.3 above. The Accused System sends instructions to the network interface (e.g., the PLC in the schematic below).

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 8	
[8] The system of claim 1, wherein at least some of the fluid-handling devices comprise a pump, and wherein the plurality of commands comprise a command to change a speed of the pump.	In the Accused System, at least some of the fluid-handling devices comprise a pump, and wherein the plurality of commands comprise a command to change a speed of the pump. *See, e.g.*: *See* claim 1 above.  Exhibit 1 (annotated).

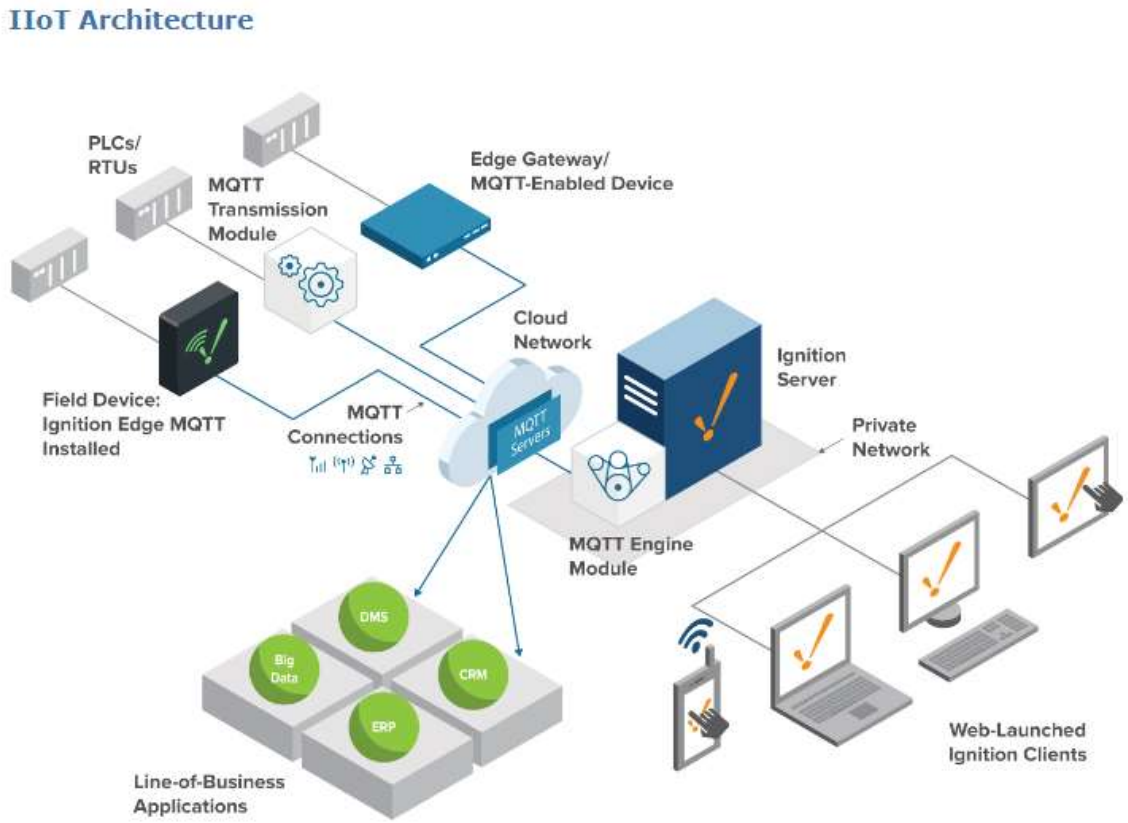
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 3. The Accused System comprises pumps equipped with variable-frequency drives (VFDs) and allows users to input commands to control the pump speed. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 9	

U.S. Patent No. 8,649,909	The Accused System
[9.1] The system of claim 1, comprising a remote terminal unit through which the one or more processes communicate with a fluid-handling device among the plurality of fluid-handling devices, wherein translating the received commands comprises:	The Accused System comprising a remote terminal unit through which the one or more processes communicate with a fluid-handling device among the plurality of fluid-handling devices. *See, e.g.*: *See* claim 1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[9.2] identifying an address on a serial bus corresponding to a component of the fluid-handling device responsive to the received command;	The Accused System identifies an address on a serial bus corresponding to a component of the fluid-handling device responsive to the received command. *See, e.g.*: The Accused System is configured to communicate with devices via a serial bus via a protocol such as Modbus. *See, e.g.*, Exhibit 5. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[9.3] identifying a command code operative to cause the component to execute the received command; and	The Accused System comprises identifying a command code operative to cause the component to execute the received command. *See, e.g.*: *See* claims 1, 9.2 above.

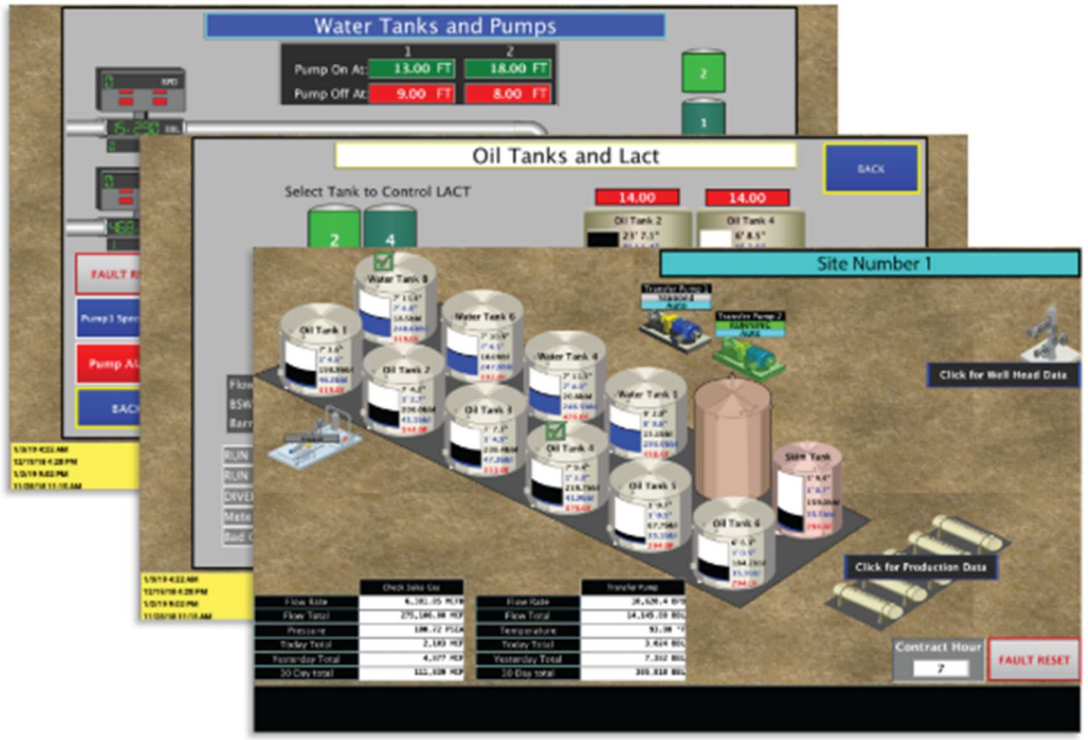
U.S. Patent No. 8,649,909	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[9.4] sending to the address on the serial bus the command code.	The Accused System comprises sending to the address on the serial bus the command code. *See, e.g.*: *See* claims 1, 9.2 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 10	
[10] The system of claim 1, comprising a digital-to-analog converter, wherein a fluid-handling device among the plurality of fluid-handling devices comprises a valve responsive to an output signal of the digital-to-analog converter, and wherein translating the received commands comprises	The Accused System comprises a digital-to-analog converter, wherein a fluid-handling device among the plurality of fluid-handling devices comprises a valve responsive to an output signal of the digital-to-analog converter, and wherein translating the received commands comprises changing an output signal of the digital-to-analog converter responsive to a received command among the plurality of received commands. *See, e.g.*: *See* claims 1, 9 above. On information and belief, the PLCs in the Accused System are configured to communicate with fluid-handling devices via analog signals. The Accused

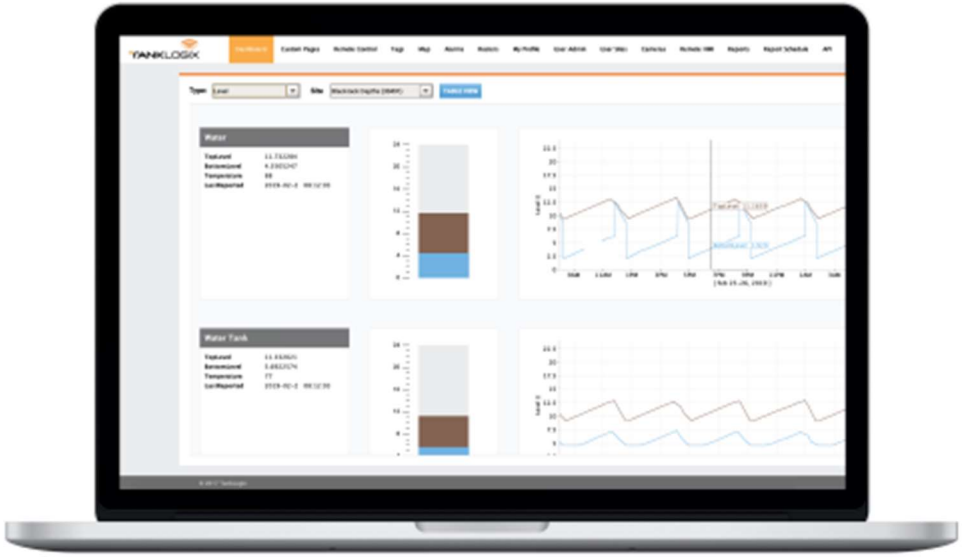
U.S. Patent No. 8,649,909	The Accused System
changing an output signal of the digital-to-analog converter responsive to a received command among the plurality of received commands.	System therefore necessarily comprises a digital-to-analog converter to translate the received commands to analog signals. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 11	
[11] The system of claim 1, wherein receiving the commands comprises receiving the commands via a first network socket, and wherein sending the translated command comprises sending at least some of the translated commands via a second network socket.	The Accused System receives the commands via a first network socket, and wherein sending the translated command comprises sending at least some of the translated commands via a second network socket. *See, e.g.*: The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 12	
[12] The system of claim 1, wherein translating the commands comprises selecting among an Internet Protocol, a	The Accused System comprises translating the commands comprises selecting among an Internet Protocol, a modbus protocol, and an analog output to convey the translated command. *See, e.g.*:

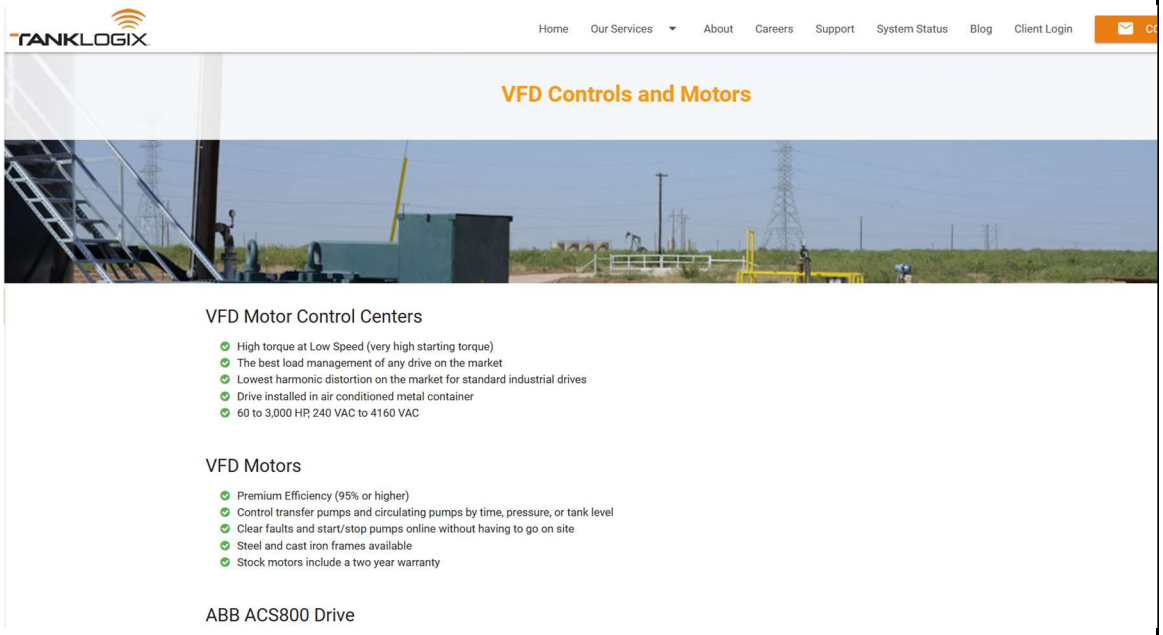
U.S. Patent No. 8,649,909	The Accused System
modbus protocol, and an analog output to convey the translated command.	*See* claims 1, 9 above. The Accused System is configured to communicate with devices via a serial bus via a protocol such as Modbus. *See, e.g.*, Exhibit 5. On information and belief, the PLCs in the Accused System are further configured to communicate with fluid-handling devices via a variety of other protocols, including analog output and IP protocols. The Accused System therefore necessarily must select the appropriate protocol for the fluid-handling device to receive the translated command. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 13	
[13] The system of claim 1, wherein a fluid-handling device among the plurality of fluid handling devices includes a stuck valve, and wherein the plurality of different target states oscillate a target position of the stuck valve to loosen the stuck valve.	The Accused System includes a fluid-handling device among the plurality of fluid handling devices includes a stuck valve, and wherein the plurality of different target states oscillate a target position of the stuck valve to loosen the stuck valve. *See, e.g.*:

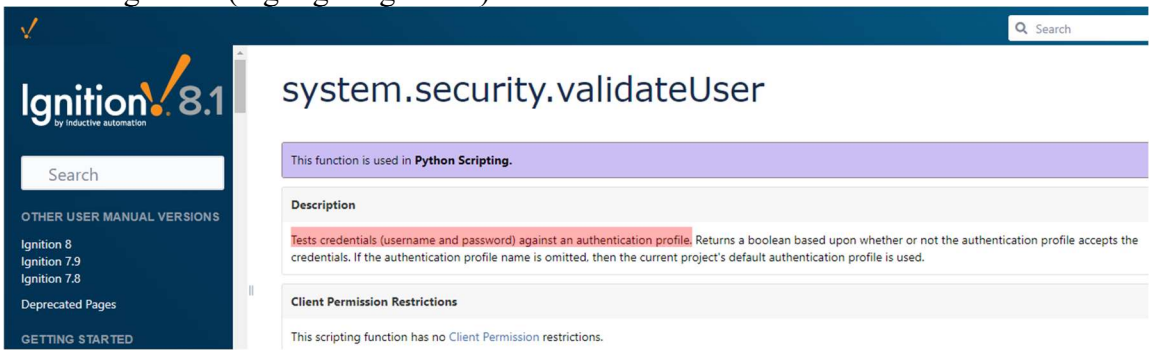
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

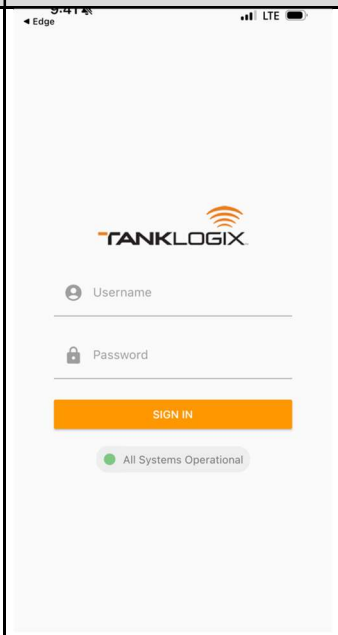
U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 14	
[14] The system of claim 1, comprising one of the following coupled to the fluid-handling devices: an oil well, a salt water disposal well, a carbon-capture well, or a pump station.	The Accused System comprises one of the following coupled to the fluid-handling devices: an oil well, a salt water disposal well, a carbon-capture well, or a pump station. *See, e.g.*: *See* claim 1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 15	
[15] The system of claim 1, wherein a fluid-handling device among the plurality of fluid handling devices comprises a separation unit configured to separate oil from water, and wherein the command comprises a command operative to change a level of the separation unit at which oil meets water.	The Accused System contains a fluid-handling device among the plurality of fluid handling devices that comprises a separation unit configured to separate oil from water, and wherein the command comprises a command operative to change a level of the separation unit at which oil meets water. *See, e.g.*:

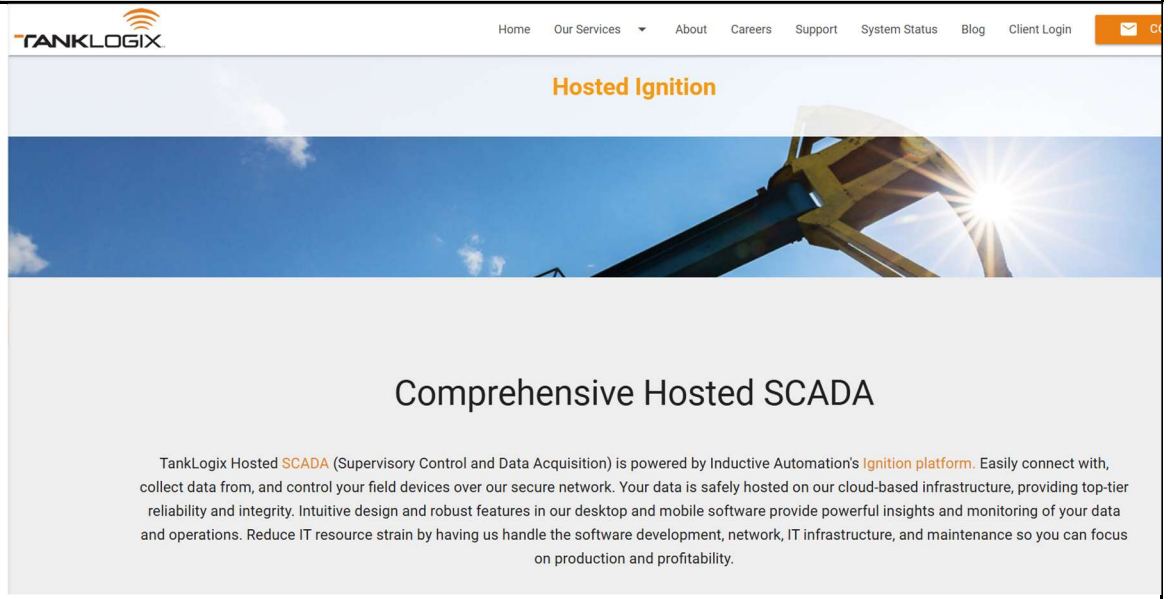
U.S. Patent No. 8,649,909	The Accused System
	

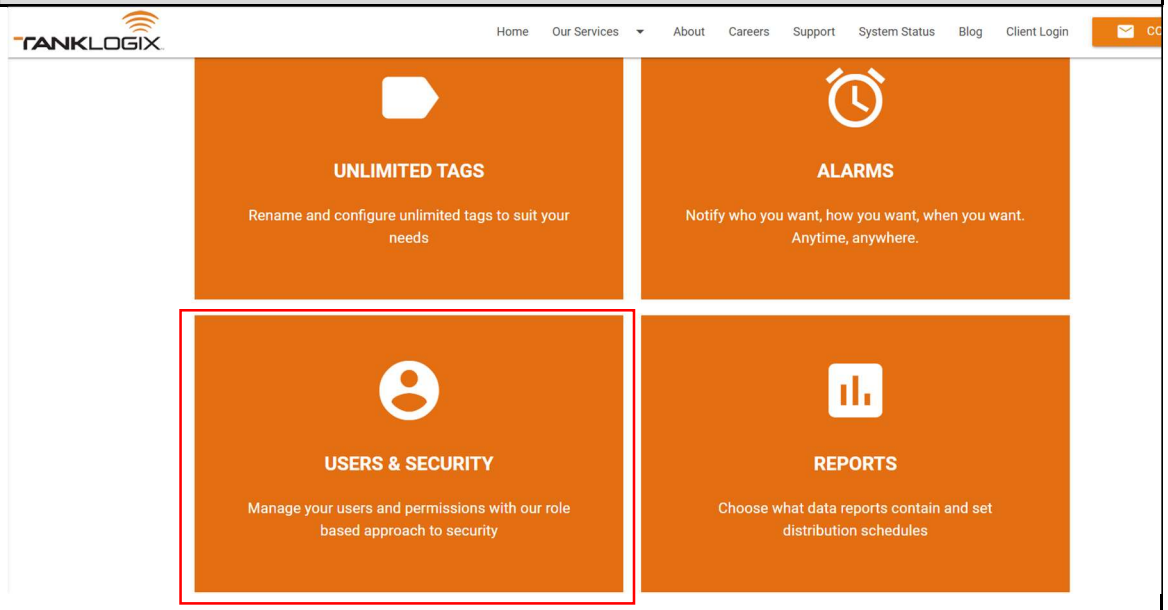
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 1. The above figures show fluid levels within separation tanks which separate oil from water. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 16	

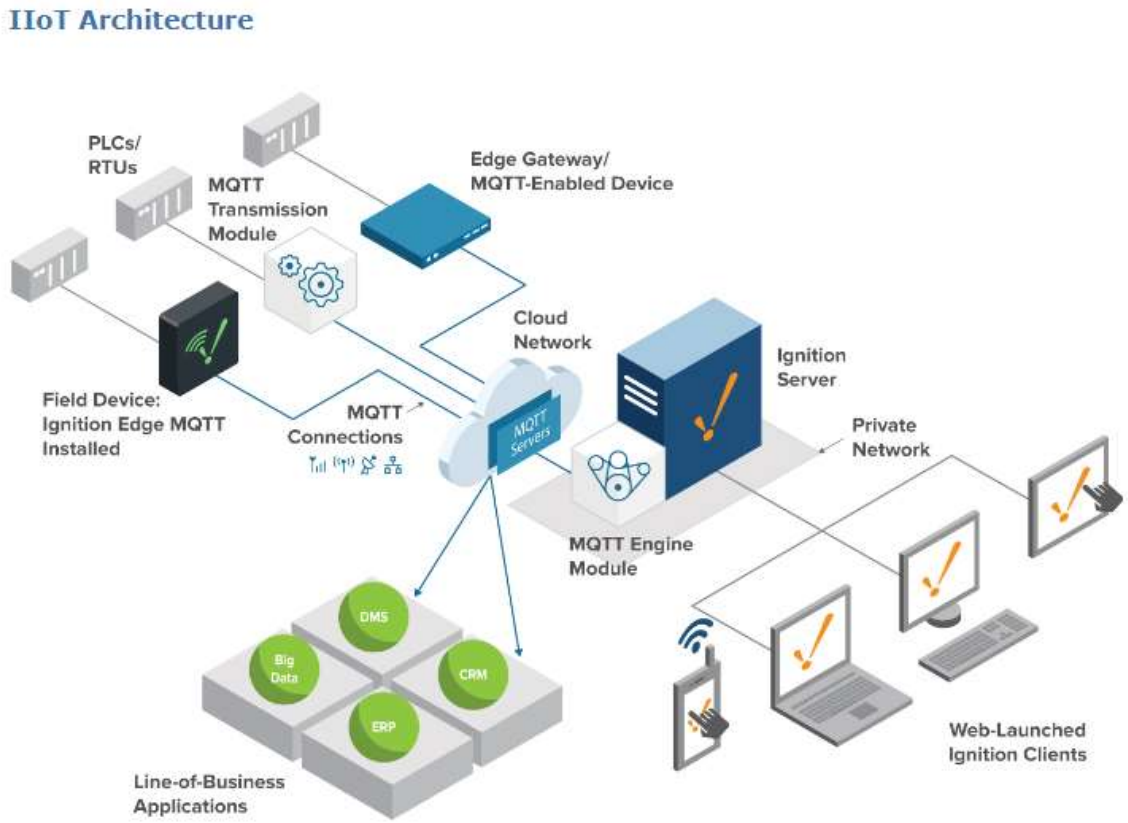
U.S. Patent No. 8,649,909	The Accused System
[16] The system of claim 15, wherein the separation unit comprises a pump having a variable-frequency drive, and wherein the local controller is operative to adjust a frequency of the variable frequency drive until the level of the separation unit reaches a target level corresponding to the target state.	The Accused System contains a separation unit which comprises a pump having a variable-frequency drive, and wherein the local controller is operative to adjust a frequency of the variable frequency drive until the level of the separation unit reaches a target level corresponding to the target state. *See* claim 15. The Accused System includes pumps equipped with VFDs (variable frequency drives) whose frequencies can be adjusted until the separation unit level reaches a target level.  Exhibit 3.

U.S. Patent No. 8,649,909	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 17	
[17] The system of claim 1, wherein each user account corresponds to one or more user names, one or more user passwords, billing information, and identifiers of one or more of the site master-controllers with which users under the corresponding account are authorized to interact.	The Accused System functions wherein each user account corresponds to one or more user names, one or more user passwords, billing information, and identifiers of one or more of the site master-controllers with which users under the corresponding account are authorized to interact. *See, e.g.*: The accounts correspond to a user name and password and are authenticated before access is granted (highlighting added):  Exhibit 11. As shown in the example below from the TankLogix mobile application, the Accused System further comprises user accounts with user names and passwords:

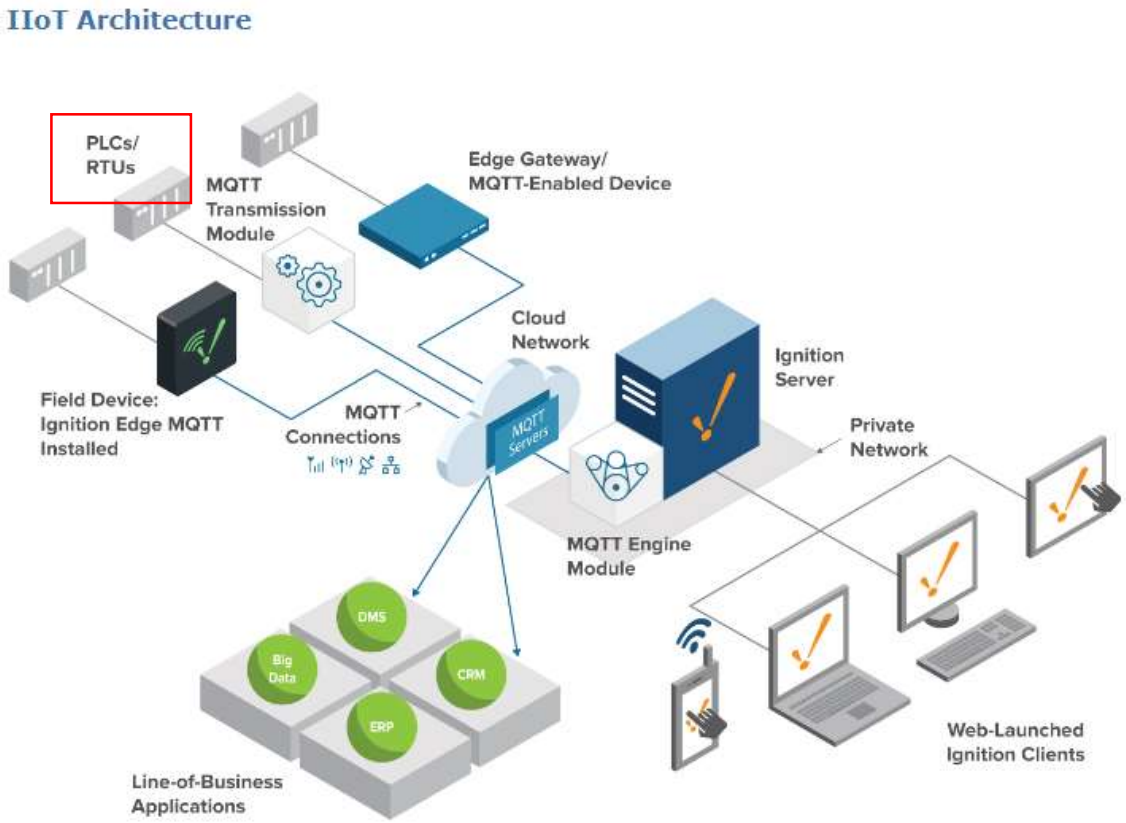
U.S. Patent No. 8,649,909	The Accused System
	 A user account also includes identification of billing information and sites and site master controllers with which the user is authorized to interact:

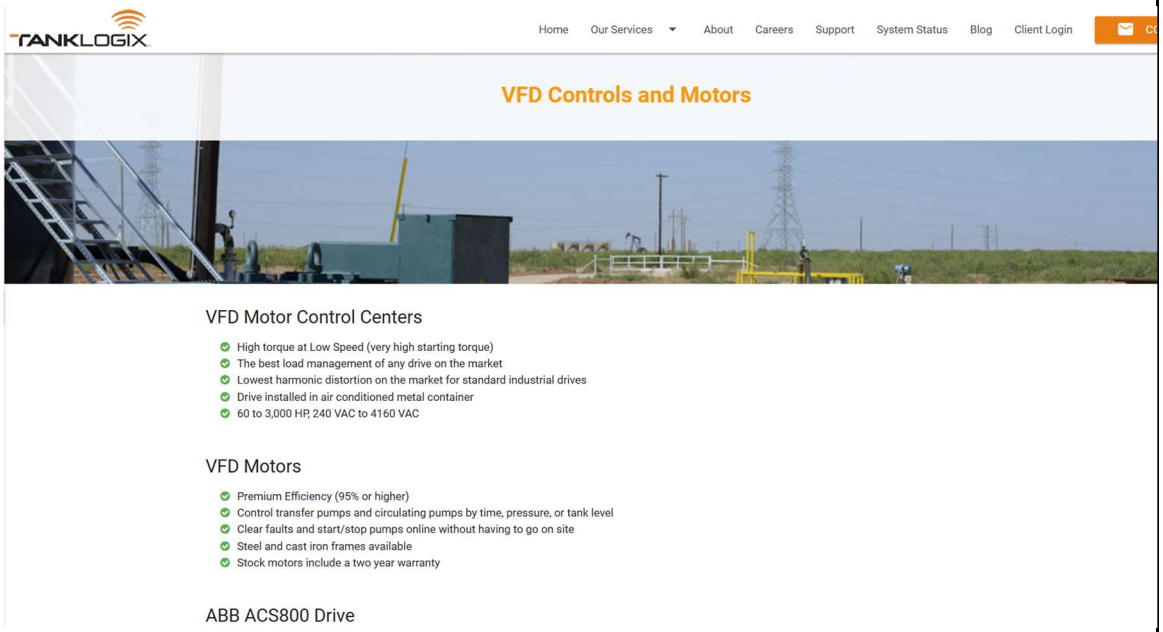
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 1. On information and belief, the Accused System provides access to TankLogix customer organizations to monitor fluid handling sites and limits visibility to site master controllers to those the user account is authorized to view.

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 1 (annotated).

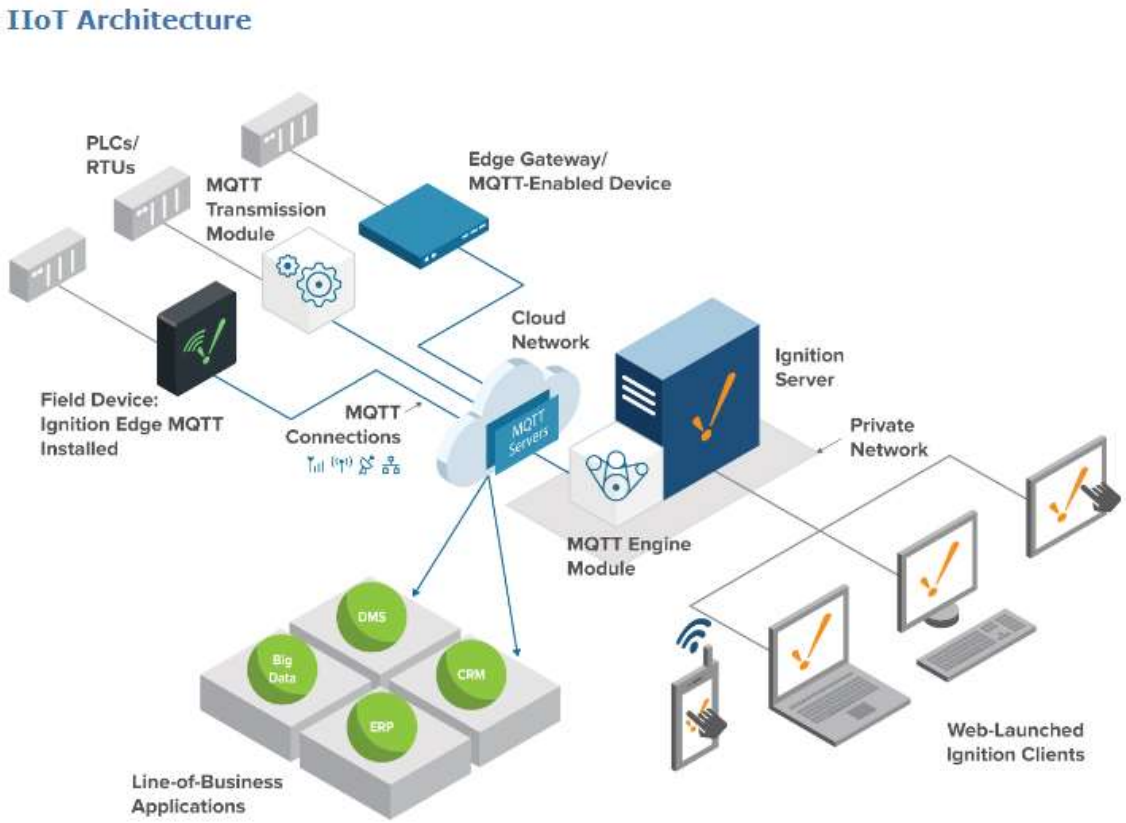
U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. *See also, e.g.*, claim 1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

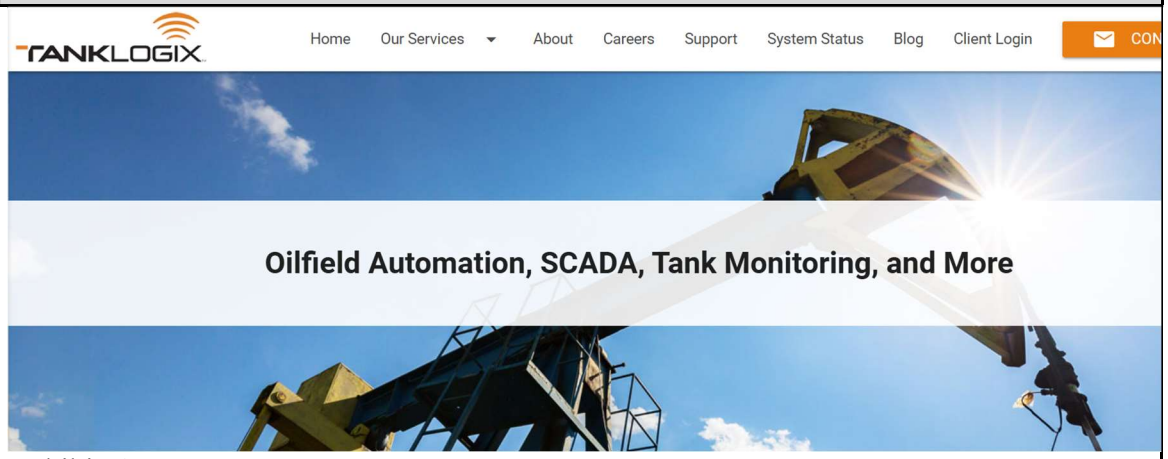
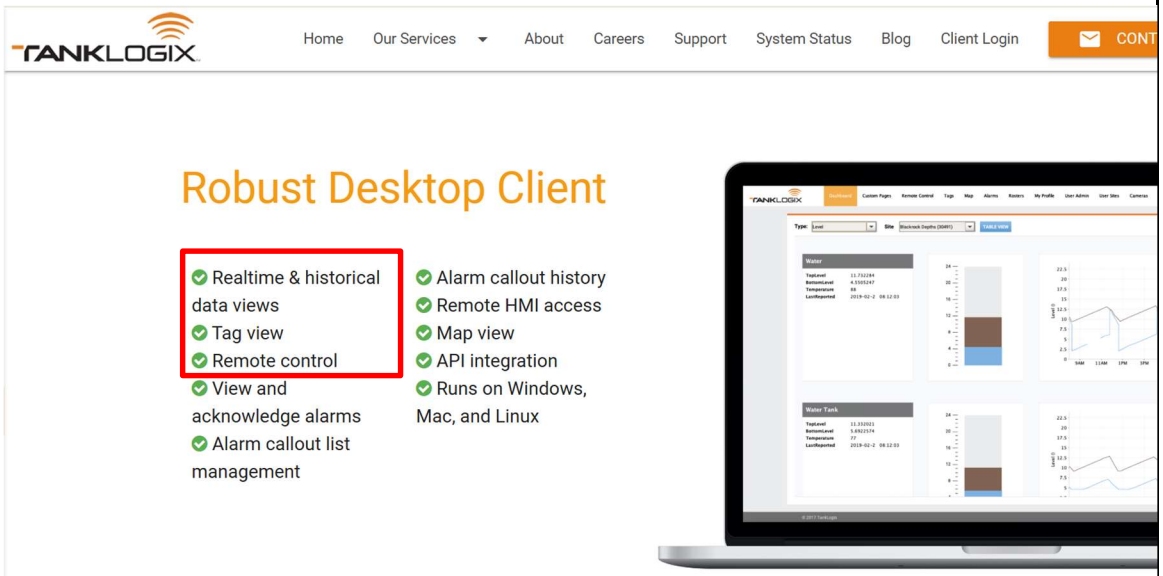
U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 18	
[18.1] The system of claim 1, wherein the system is operative to exercise two layers of control, the two layers of control including:	In the Accused System, the system is operative to exercise two layers of control. *See, e.g.*: *See* claim 1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[18.2] a first layer of control in which targeted states of the fluid handling devices are determined by a respective site master controller in response to some of the received commands; and	In the Accused System, a first layer of control in which targeted states of the fluid handling devices are determined by a respective site master controller in response to some of the received commands. *See, e.g.*:

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 8,649,909	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[18.3] a second layer of control in which, for each targeted state specified by the first layer of control, the respective fluid-handling device exercises feedback control to drive the respective fluid-handling device to the respective targeted state.	In the Accused System, a second layer of control in which, for each targeted state specified by the first layer of control, the respective fluid-handling device exercises feedback control to drive the respective fluid-handling device to the respective targeted state. *See, e.g.*: On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.  Exhibit 3.

U.S. Patent No. 8,649,909	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 19	
[19] The system of claim 1, wherein the system is operative to provide web-based control and monitoring of oil and gas wells to multiple account holders corresponding to the user accounts.	*See* claims 1 and 18 above.

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 2.

U.S. Patent No. 8,649,909	The Accused System
	 Exhibit 6.  Exhibit 1 (annotated).

U.S. Patent No. 8,649,909	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 20	
[20.1] A tangible, non-transitory machine-readable medium storing instructions that when executed by a data processing apparatus cause the data processing apparatus to perform operations comprising:	*See* claims 1, 2 above.
[20.2] receiving, via a network interface, from a remote user device, a plurality of commands to control a plurality of different fluid-handling devices, each of the plurality of commands being directed to a different one of the plurality of fluid-handling devices, and the plurality of commands being encoded in a first protocol;	*See* claims 1, 2 above.
[20.3] determining a plurality of different target states of the fluid-handling devices over time such that control of the fluid handling devices is	*See* claims 1, 2 above.

U.S. Patent No. 8,649,909	The Accused System
maintained in the absence of a network connection with the remote user device;	
[20.4] translating the plurality of commands into a plurality of translated commands operative to cause local controllers of the fluid-handling devices to drive the respective fluid-handling devices to different target states among the plurality of different target states, the plurality of translated commands including translated commands encoded in a plurality of different protocols, and the local controllers being responsive to the translated commands and feedback from a corresponding fluid-handling device among the plurality of different fluid handling devices, the feedback being indicative of whether the corresponding fluid-handling device is in a targeted state; and	*See* claims 1, 2 above.
[20.5] sending the translated commands to the local controllers.	*See* claims 1, 2 above.
Claim 21	
[21.1] A method, comprising:	*See* claims 1, 2 above.

U.S. Patent No. 8,649,909	The Accused System
[21.2] receiving, via a network interface, from a remote user device, a plurality of commands to control fluid-handling devices, the plurality of commands being encoded in a shared protocol;	*See* claims 1, 2 above.
[21.3] determining a plurality of different target states of the fluid-handling devices over time such that control of the fluid handling devices is maintained;	*See* claims 1, 2 above.
[21.4] translating the commands into translated commands encoded in a plurality of different protocols different from the shared protocol, each translated command being encoded in a protocol among the plurality of different protocols suitable for a fluid-handling device to which the respective command is directed, the translated commands being operative to cause local controllers of the fluid-handling devices to drive a respective fluid-handling device different target states among the plurality of different target states, the local controllers being responsive to the translated commands directed to their respective fluid-	*See* claims 1, 2 above.

U.S. Patent No. 8,649,909	The Accused System
handling device and feedback from the respective fluid-handling device indicative of whether the respective fluid-handling device is in a targeted state; and	
[21.5] sending the translated commands to the local controllers.	*See* claims 1, 2 above.

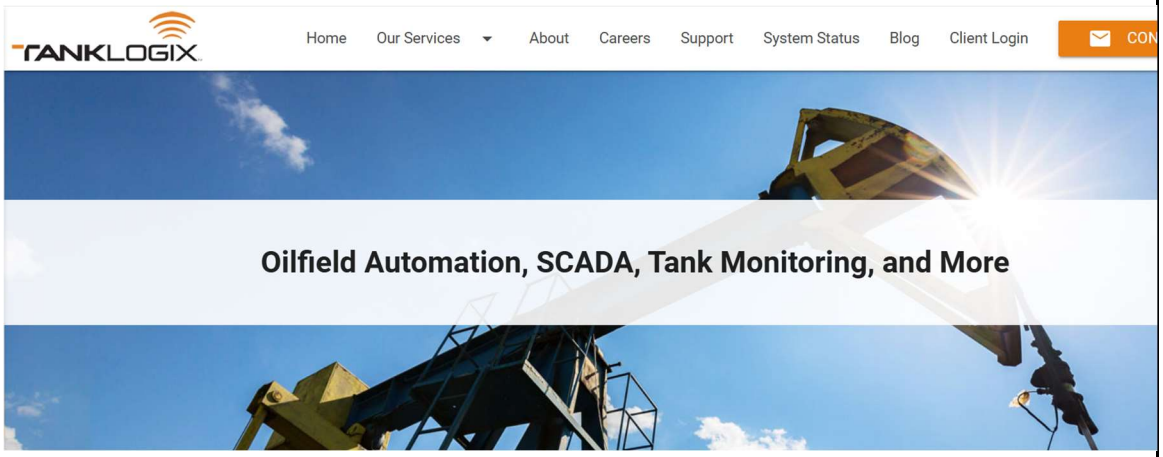
Exhibit B

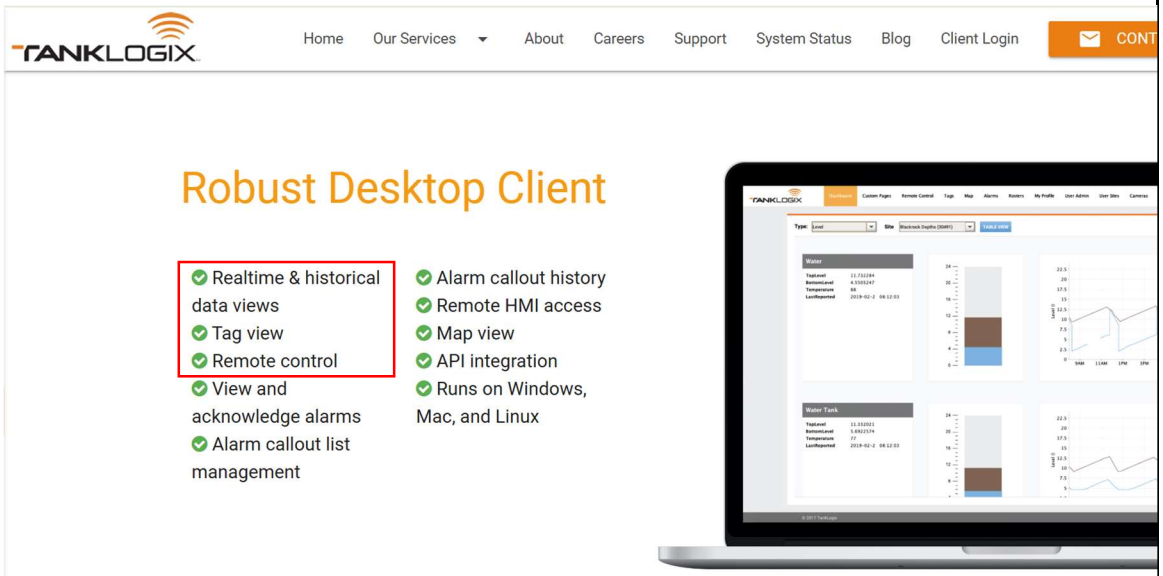
Infringement Analysis of U.S. Patent No. 9,898,014 the TankLogix Ignition-Hosted Automation System Implemented by TankLogix LLC ("TankLogix")

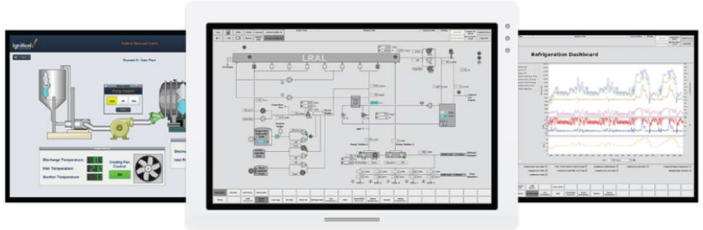
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System(s) each element of claims 1-23 of U.S. Patent No. 9,898,014 (the "'014 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed and implemented by TankLogix, LLC.

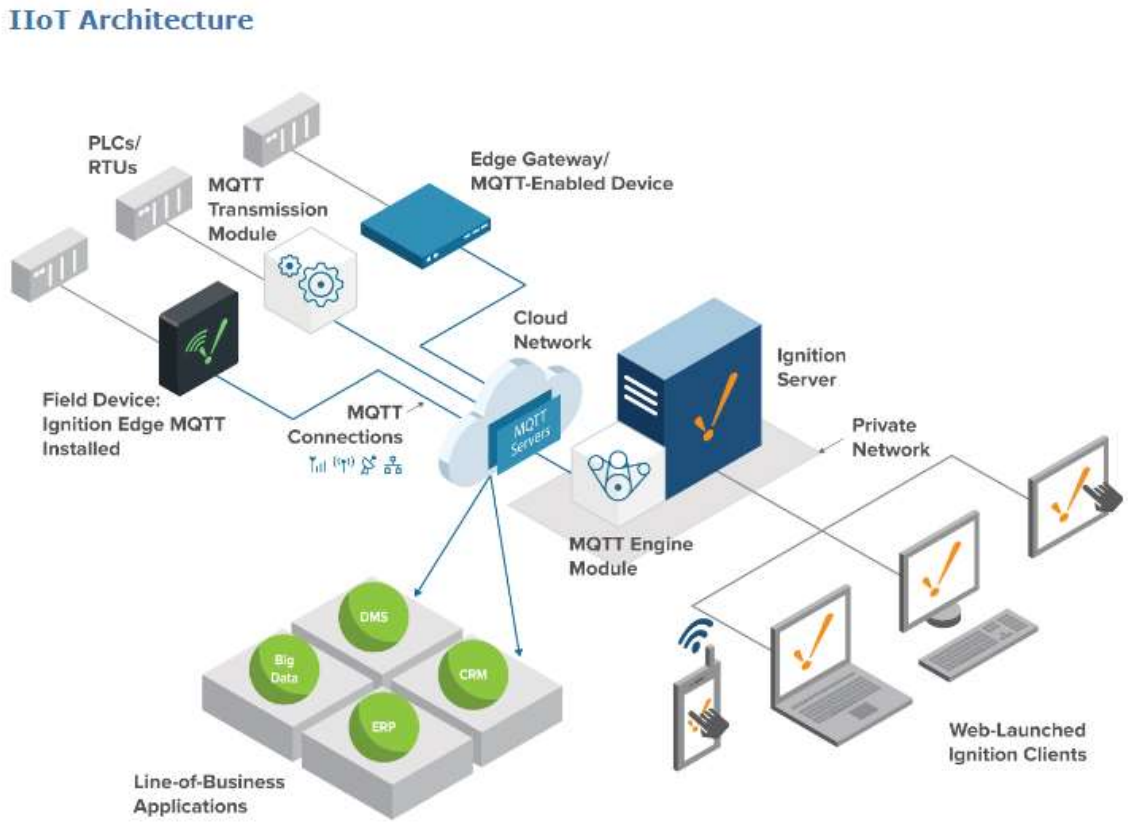
References Cited:

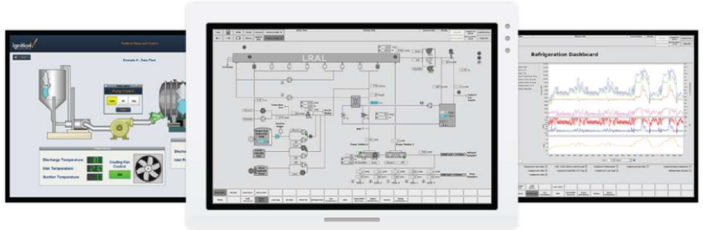
- Exhibit 1, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 2, https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition.
- Exhibit 3, https://www.tanklogix.com/tank-monitoring/.
- Exhibit 4, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 5, https://tanklogix.com/tank-monitoring/regulation-prevention.
- Exhibit 6, https://www.tanklogix.com/vfd-controls-and-motors/.
- Exhibit 7, https://www.tanklogix.com/.
- Exhibit 8, https://www.docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge/edge-gateway/configuring-sync-services#data-synchronization.
- Exhibit 9, https://www.docs.inductiveautomation.com/docs/8.1/ignition-modules/perspective/working-with-perspective-components/component-events-and-actions.

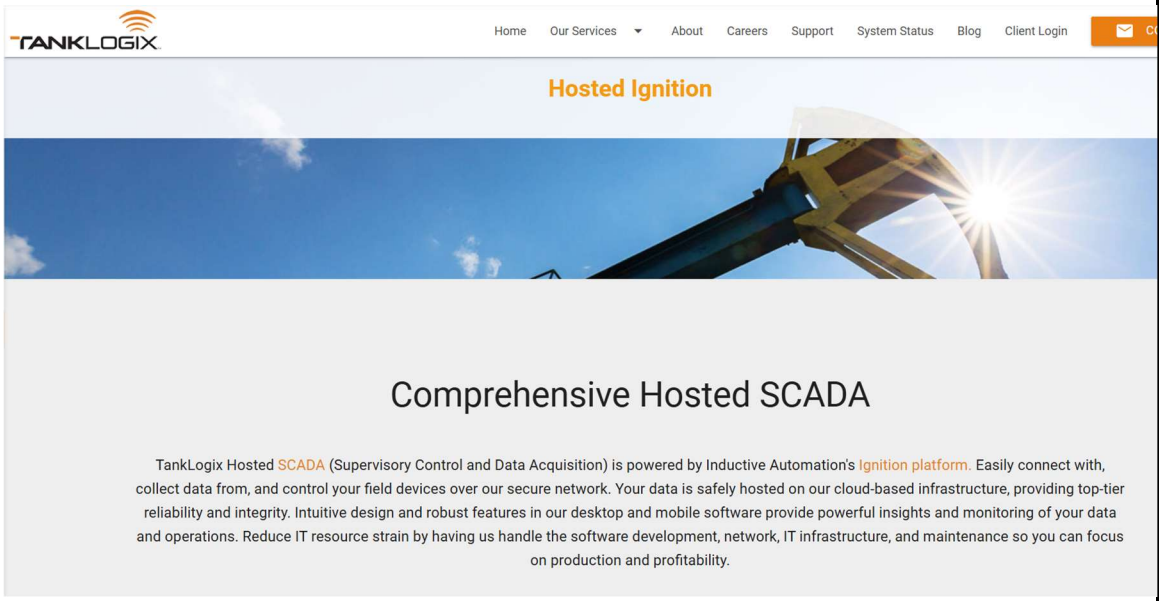
U.S. Patent No. 9,898,014	The TankLogix System
Claim 1	
[1.1] A hosted, web-based, remote industrial monitoring and control system for geographically distributed facilities in oil and gas fields, the system comprising:	Regardless of whether the preamble limits the claim, the Accused System includes a hosted, web-based, remote industrial monitoring and control system for geographically distributed facilities in oil and gas fields. *See, e.g.*:  Exhibit 7.

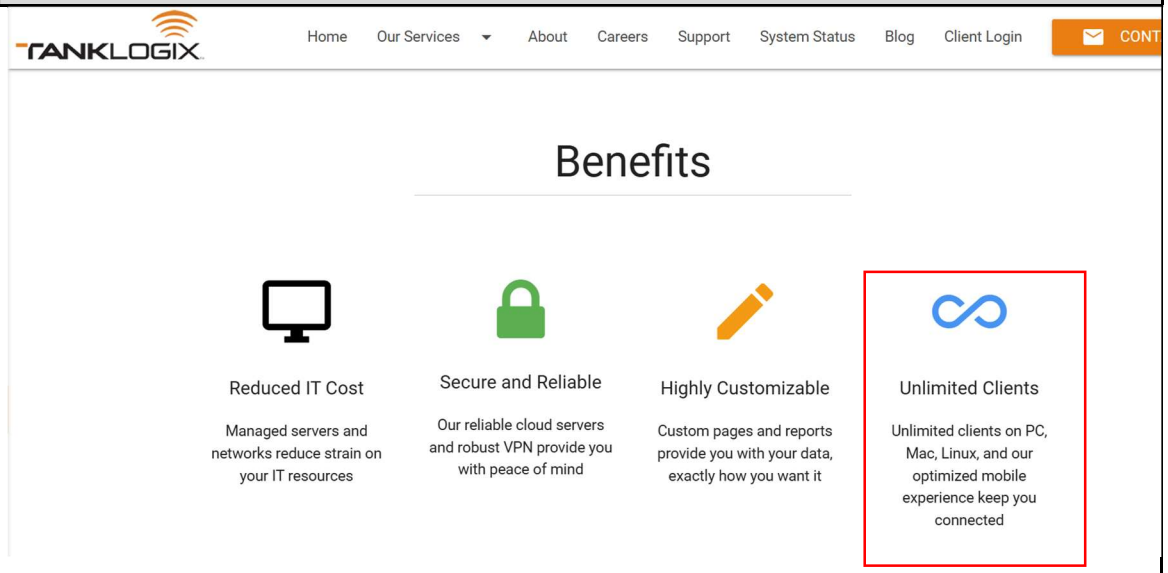
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated).

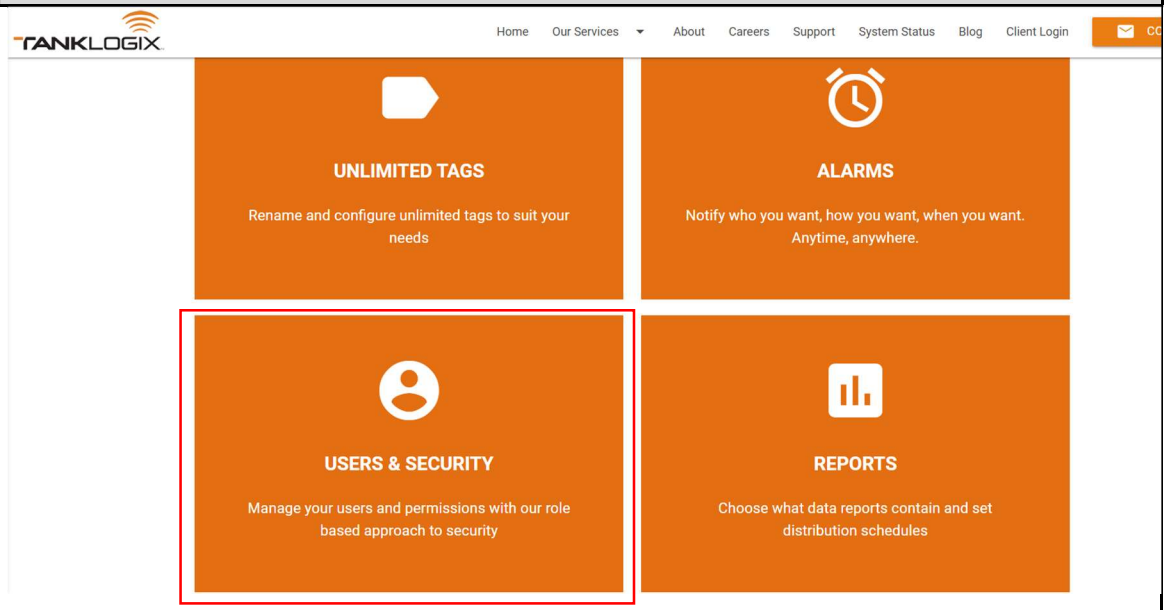
U.S. Patent No. 9,898,014	The TankLogix System
	Ignition User Manual Docs SDK Guide 8.3 News Resources Partner Links 8.1 Downloac Welcome Getting Started Introducing Ignition Modules Overview Startup Guide 1. Download and Install Ignition 2. Launch the Gateway 3. Connect to a Device 4. Connect to a Database 5. Open the Designer 6. Create Tags 7. Add History to Tags 8. Add Components - Perspective Session Web-based HMI and SCADA applications deployment Using web technologies, you can access PLCs and connect to SQL databases on any platf Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See manage your entire system from one place.  Exhibit 2.

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents.
[1.2] a computer-implemented datastore storing:	The Accused System includes a computer-implemented datastore. *See, e.g.*:

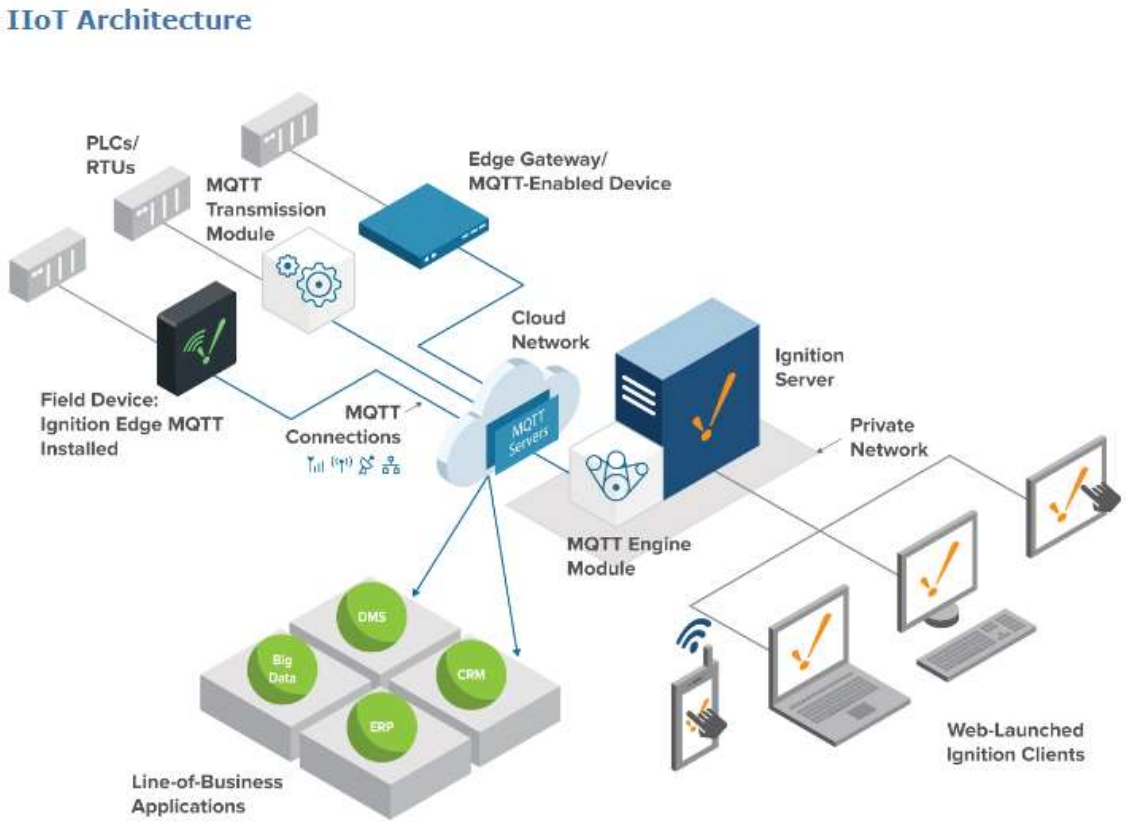
U.S. Patent No. 9,898,014	The TankLogix System
	Ignition User Manual Docs SDK Guide 8.3 News Resources Partner Links 8.1 Download Welcome Getting Started Introducing Ignition Modules Overview Startup Guide 1. Download and Install Ignition 2. Launch the Gateway 3. Connect to a Device 4. Connect to a Database 5. Open the Designer 6. Create Tags 7. Add History to Tags 8. Add Components - Perspective Session **Web-based HMI and SCADA applications deployment** Using web technologies, you can access PLCs and connect to SQL databases on any platf Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See manage your entire system from one place.  Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

U.S. Patent No. 9,898,014	The TankLogix System
[1.3] a plurality of accounts, each account corresponding to an entity operating one or more geographically distributed oil or gas facilities, the accounts associating different oil or gas facilities with different entities; and	The Accused System includes a plurality of accounts, each account corresponding to an entity operating one or more geographically distributed fluid-handling facilities, the accounts associating different fluid-handling facilities with different entities. *See, e.g.*:  Exhibit 1. On information and belief, TankLogix Hosted Ignition products provide access to TankLogix customer organizations (different entities) to monitor their organizations' oil or gas facilities. As in the examples shown below, each customer organization (different entity) can access the system via unlimited clients and can manage multiple user accounts.

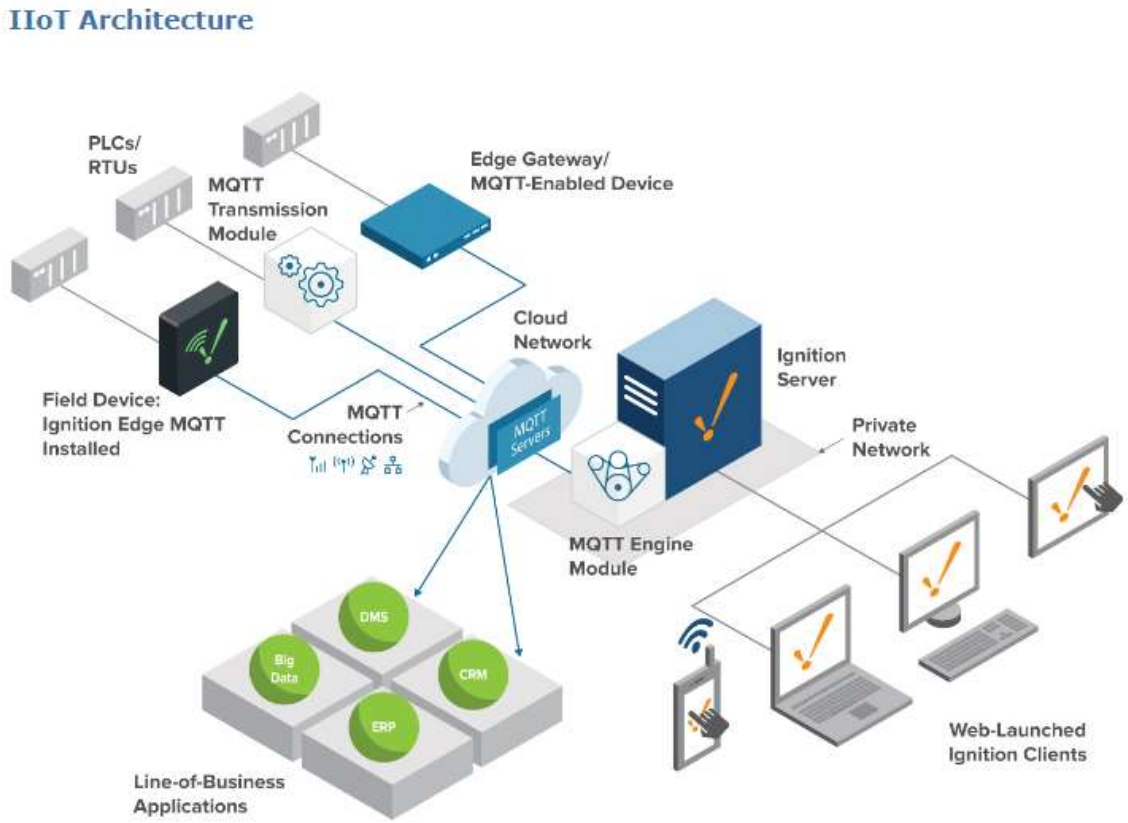
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated).

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated). *See also, e.g.*, claim element 1.2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.4] network addresses by which industrial monitoring or control equipment at the facilities is accessible	The Accused System includes network addresses by which industrial monitoring or control equipment at the facilities is accessible via cellular network connections, the monitoring or control equipment including sensors or actuators. *See, e.g.*:

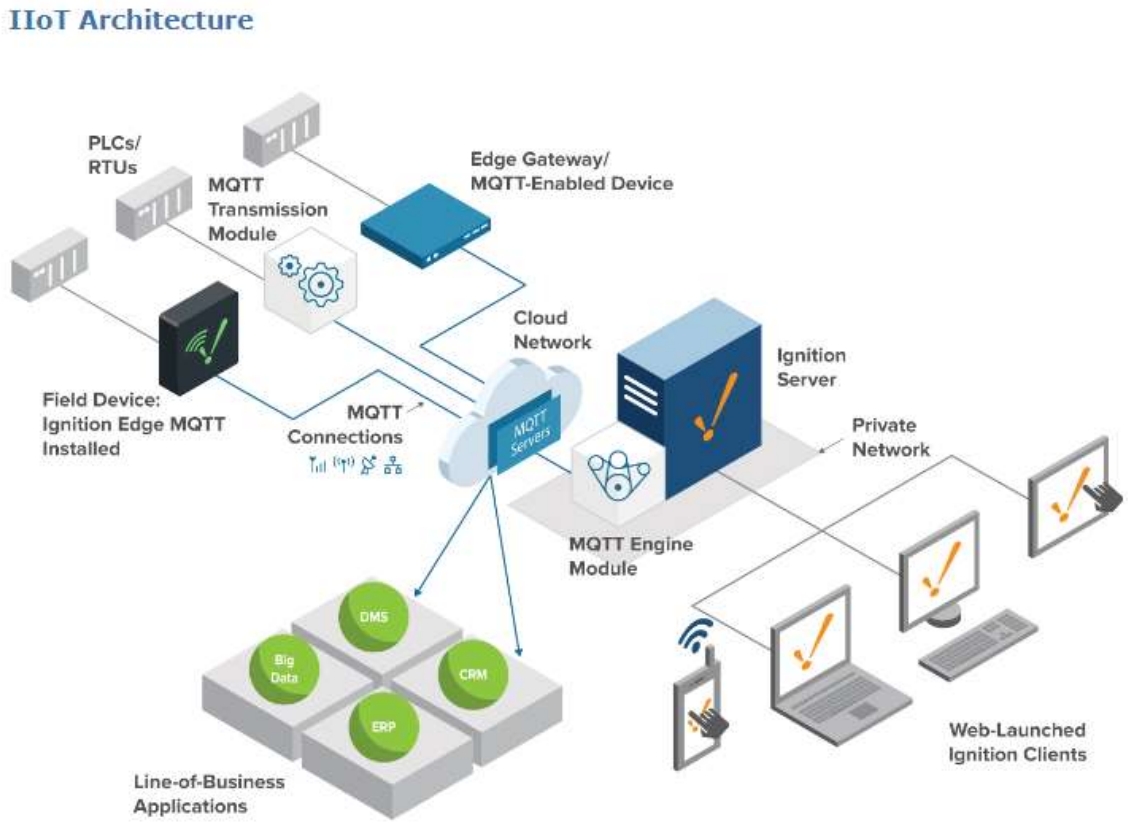
U.S. Patent No. 9,898,014	The TankLogix System
via cellular network connections, the monitoring or control equipment including sensors or actuators;	Tank Monitoring TankLogix provides a complete liquid inventory management system, the TankWarden. TankWarden empowers producers by giving them complete control over t inventory and distribution. - Eliminate manual tank gauging - Web-based data tracking - Cellular and satellite communication for even the most remote locations - Single or dual level, high-precision, magnetostrictive sensors - TankLogix brand sensors are oil & gas field grade, made in USA - Provide flow and pressure readings to monitor pumps, flow lines, and vessels Exhibit 3. Communications Systems Cellular and Satellite TankLogix understands how important information is to business owners and managers. With cellular and Satellite technology, the TankLogix system can be usec anywhere in the world, providing custom solutions to fit any tank owner or transport company. Exhibit 3. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.5] a computer-implemented facility-interface module or modules configured to obtain data from the sensors at the facilities and send commands to the actuators at the	In the Accused System, a computer-implemented facility-interface module or modules are configured to obtain data from the sensors at the facilities and send commands to the actuators at the facilities via the network connections. *See, e.g.*:

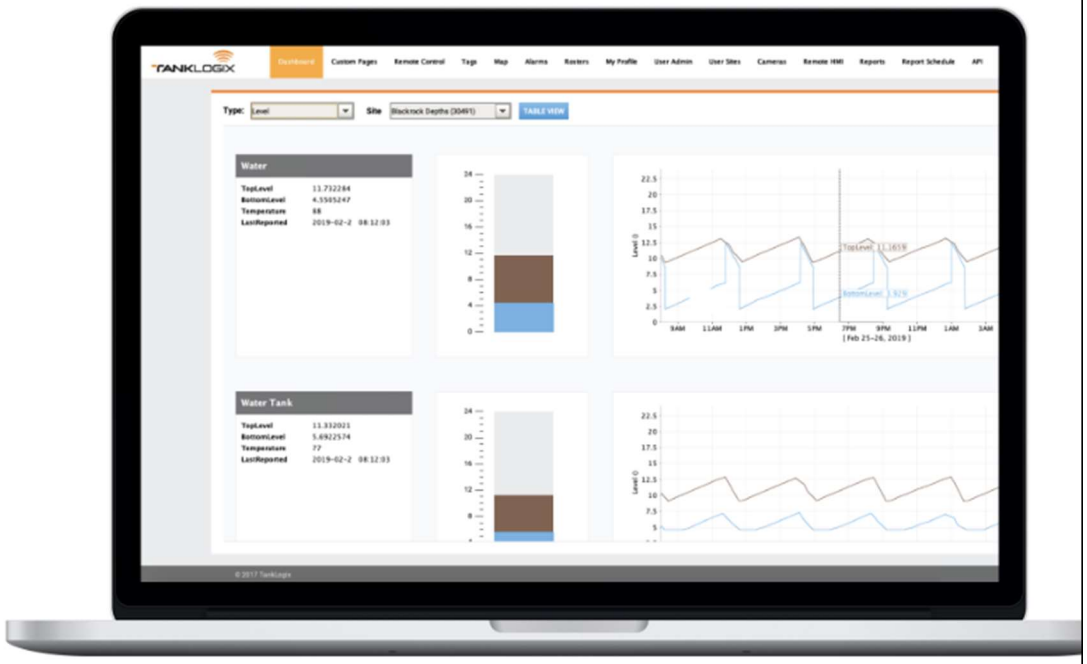
U.S. Patent No. 9,898,014	The TankLogix System
facilities via the cellular network connections; and	 Exhibit 4. The Ignition Server shown by the schematic above includes a computer-implemented facility-interface module or modules configured to obtain data from the sensors at the facilities and send commands to the actuators (connected to the Field Device) at the facilities via the network connections. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the

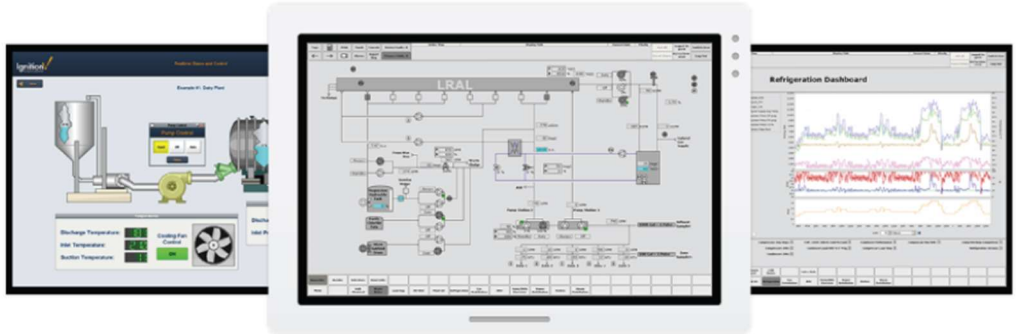
U.S. Patent No. 9,898,014	The TankLogix System
	insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.6] a computer-implemented web-interface module or modules configured to send instructions to present control interfaces in web browsers executing on user computing devices logged in to the accounts and to receive commands to control actuators from the user computing devices,	The Accused System includes a computer-implemented web-interface module or modules configured to send instructions to present control interfaces in web browsers executing on user computing devices logged in to the accounts and to receive commands to control actuators from the user computing devices. *See, e.g.*: Control interfaces are presented in web browsers executing on user computing devices logged in to the accounts (the Web-Launched Ignition Clients shown by the schematic below).

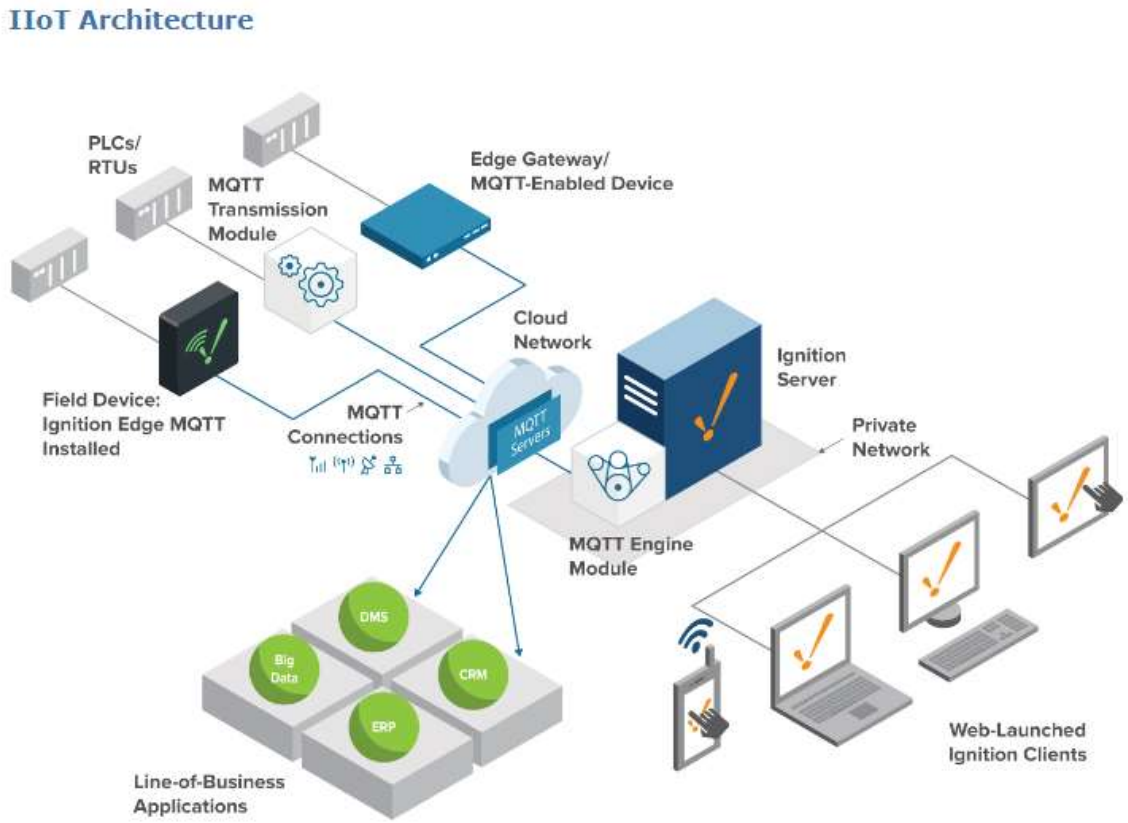
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

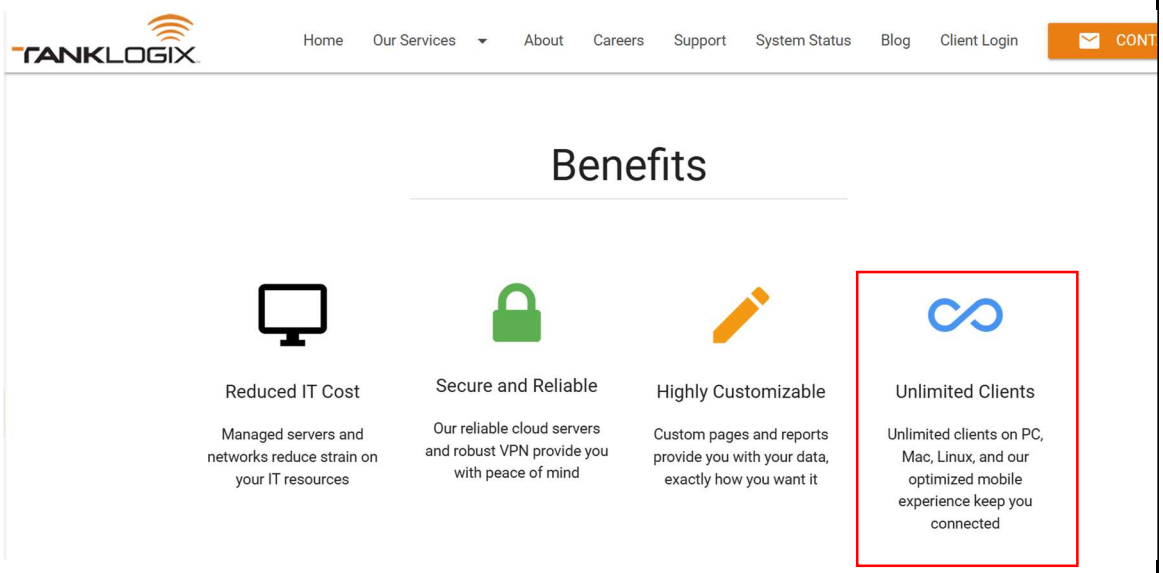
U.S. Patent No. 9,898,014	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.7] wherein the system is configured to receive, with the web-interface module or modules, a user command to actuate an actuator entered via a presented control interface, identify a network address in the datastore corresponding to a facility at which the actuator is located, and send instructions with the facility-interface module or modules to the facility to actuate the actuator, and	The system in the Accused System is configured to receive, with the web-interface module or modules, a user command to actuate an actuator entered via a presented control interface, identify a network address in the datastore corresponding to a facility at which the actuator is located, and send instructions with the facility-interface module or modules to the facility to actuate the actuator. *See, e.g.*:

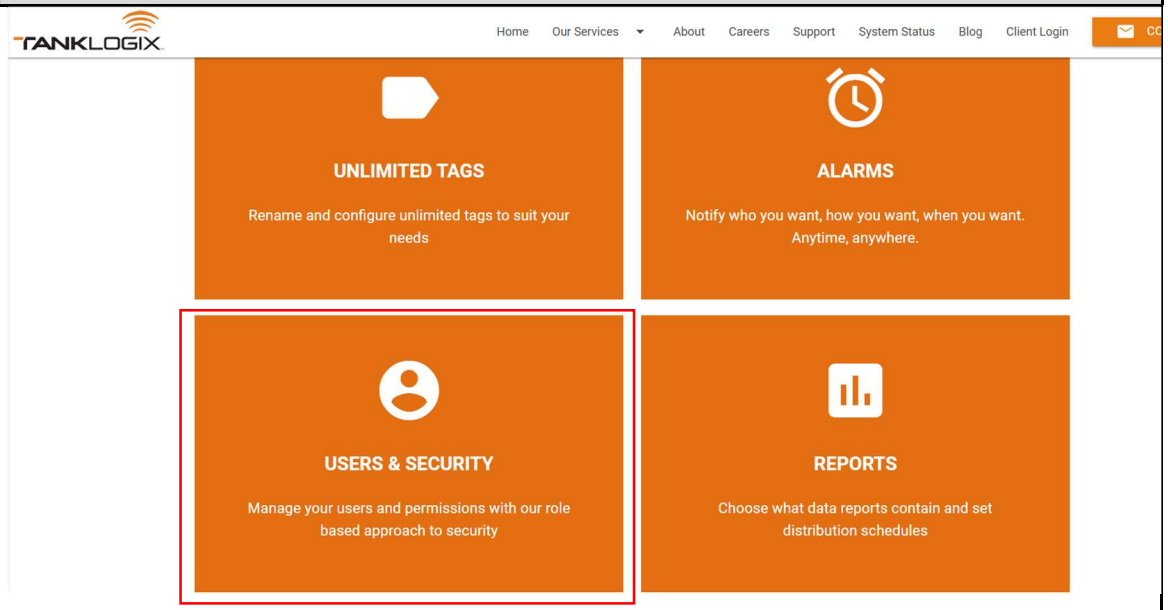
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. The Accused Product receives a command via a control interface such as the example shown below:

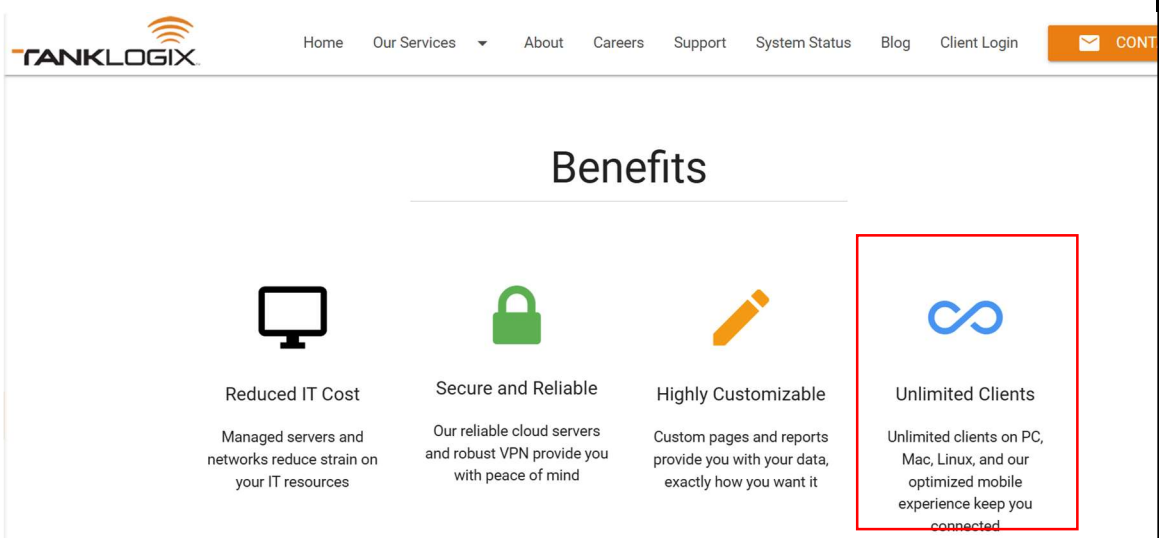
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. A network address is identified in the datastore corresponding to a facility at which the actuator is located. Examples of the datastore include the SQL databases described in the Ignition User Manual:

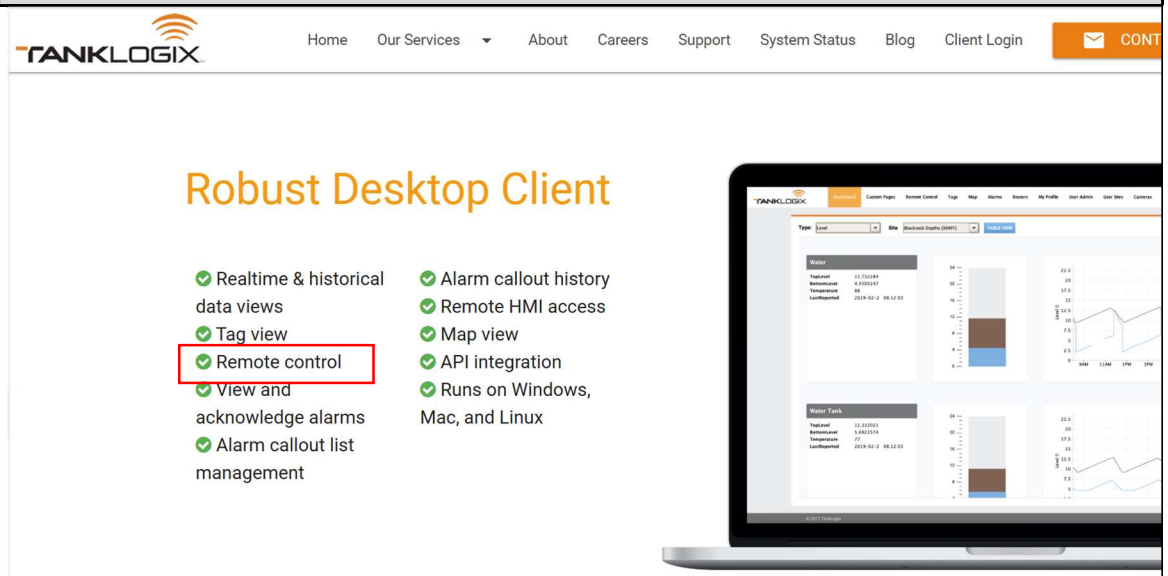
U.S. Patent No. 9,898,014	The TankLogix System
	Web-based HMI and SCADA applications deployment # Using web technologies, you can access PLCs and connect to SQL databases on any platf Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient v Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See manage your entire system from one place.  Exhibit 2. The Accused System sends instructions with the facility-interface module or modules to the facility (for example, the PLC or Field Device in the schematic below) to actuate the actuator.

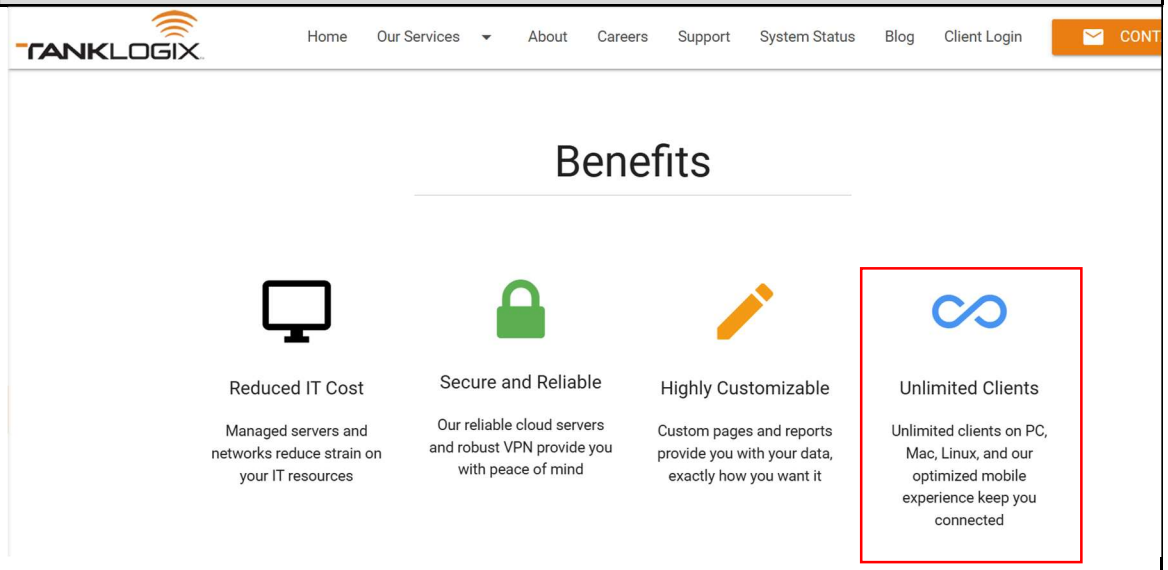
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

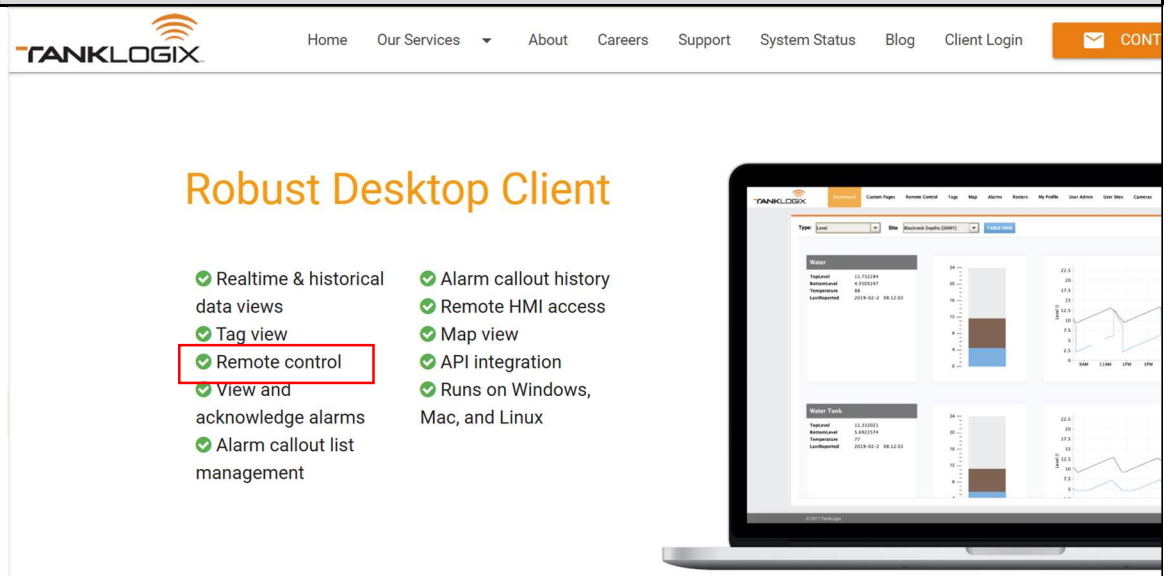
U.S. Patent No. 9,898,014	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.8] wherein: the plurality of accounts include a first account, a second account, a third account, and a fourth account;	In the Accused System, the plurality of accounts include a first account, a second account, a third account, and a fourth account. *See, e.g.*: On information and belief, TankLogix Hosted Ignition products provide access to TankLogix customer organizations (different entities) to monitor field devices (oil wells, petro water disposal or re-injection facilities, or petroleum pumping stations). As in the examples shown below, each customer organization (different entity) can access the system via unlimited clients and can manage multiple user accounts, including at least a first account, second account, third account and a fourth account:  Exhibit 1 (annotated).

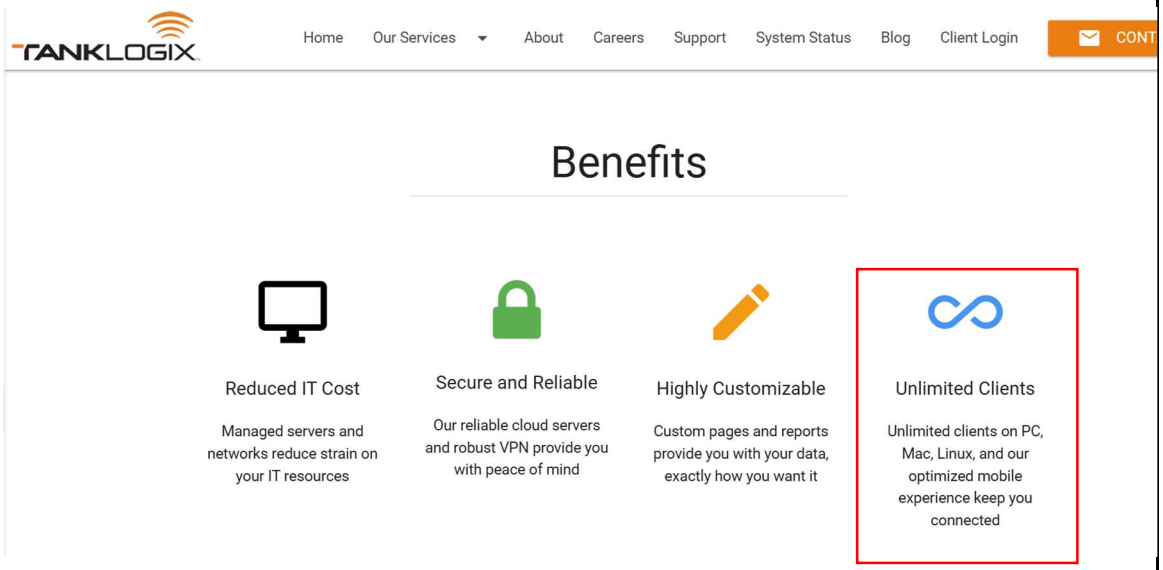
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.9] the first account corresponds to a first group of oil or gas facilities, users of the first account being authorized to	In the Accused System, the first account corresponds to a first group of oil or gas facilities, users of the first account being authorized to send commands to remotely control fluid handling devices at the first group of oil or gas facilities. *See, e.g.*:

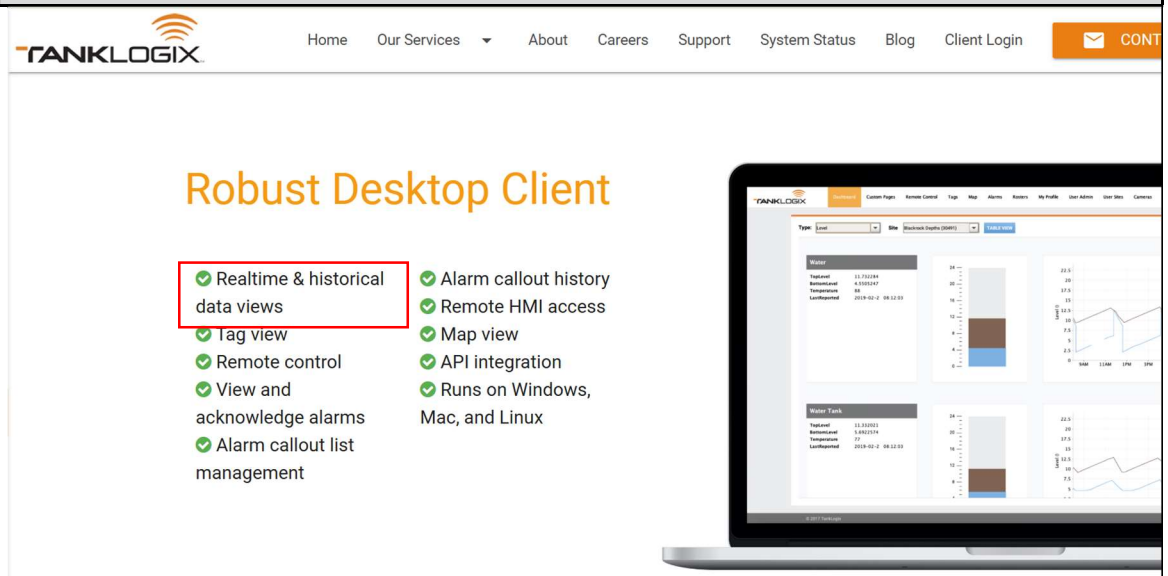
U.S. Patent No. 9,898,014	The TankLogix System
send commands to remotely control fluid handling devices at the first group of oil or gas facilities;	 Exhibit 1 (annotated).

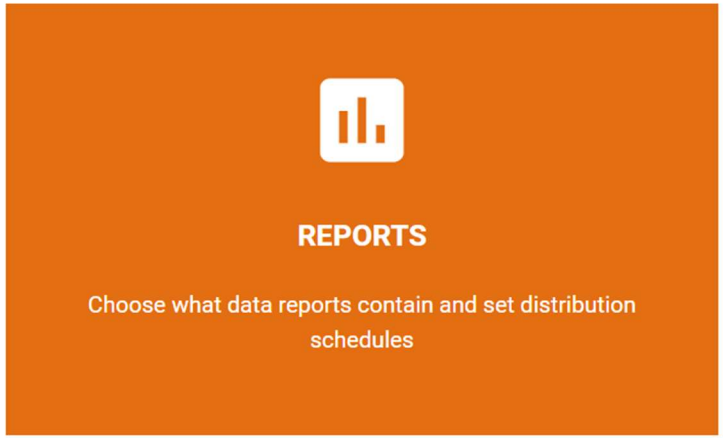
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.10] the second account corresponds to a second group of oil or gas facilities, the first group being different from the second group, users of the second	In the Accused System, the second account corresponds to a second group of fluid-handling facilities, the first group being different from the second group, one or more users of the second account being authorized to send commands to remotely control fluid handling devices at the second group of fluid-handling facilities. *See, e.g.*:

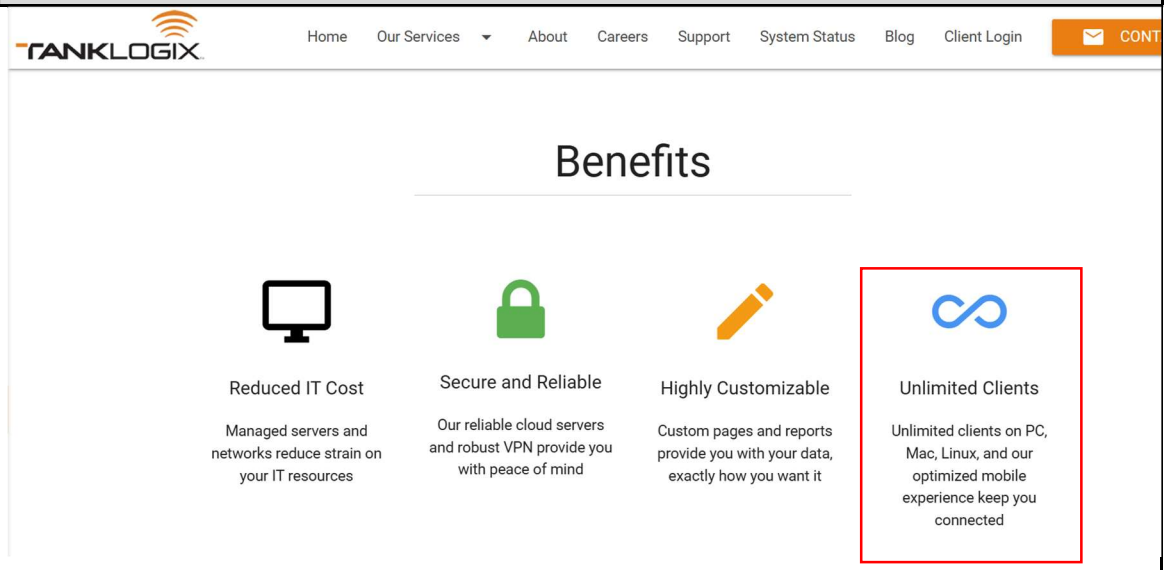
U.S. Patent No. 9,898,014	The TankLogix System
account being authorized to send commands to remotely control fluid handling devices at the second group of oil or gas facilities;	 Exhibit 1 (annotated).

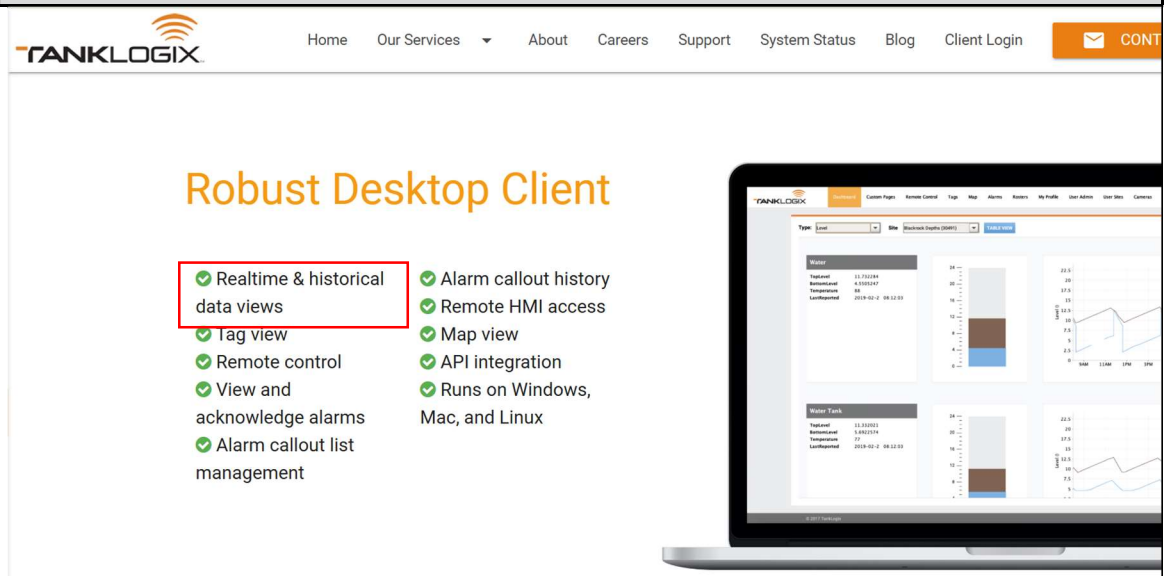
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated). *See also, e.g.*, claim element 1.9 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

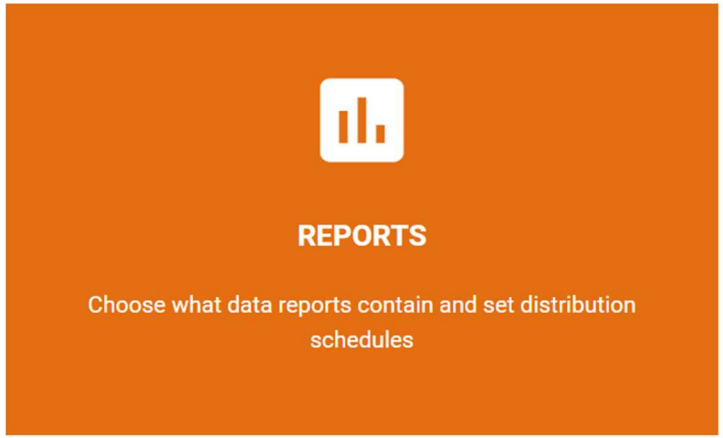
U.S. Patent No. 9,898,014	The TankLogix System
[1.11] the third account corresponds to the first group of oil or gas facilities, users of the third account being authorized to view reports of data from fluid handling devices at the first group of oil or gas facilities; and	In the Accused System, the third account corresponds to the first group of fluid-handling facilities, one or more users of the third account being authorized to view reports of data from fluid handling devices at the first group of fluid-handling facilities. *See, e.g.*:  Exhibit 1 (annotated).

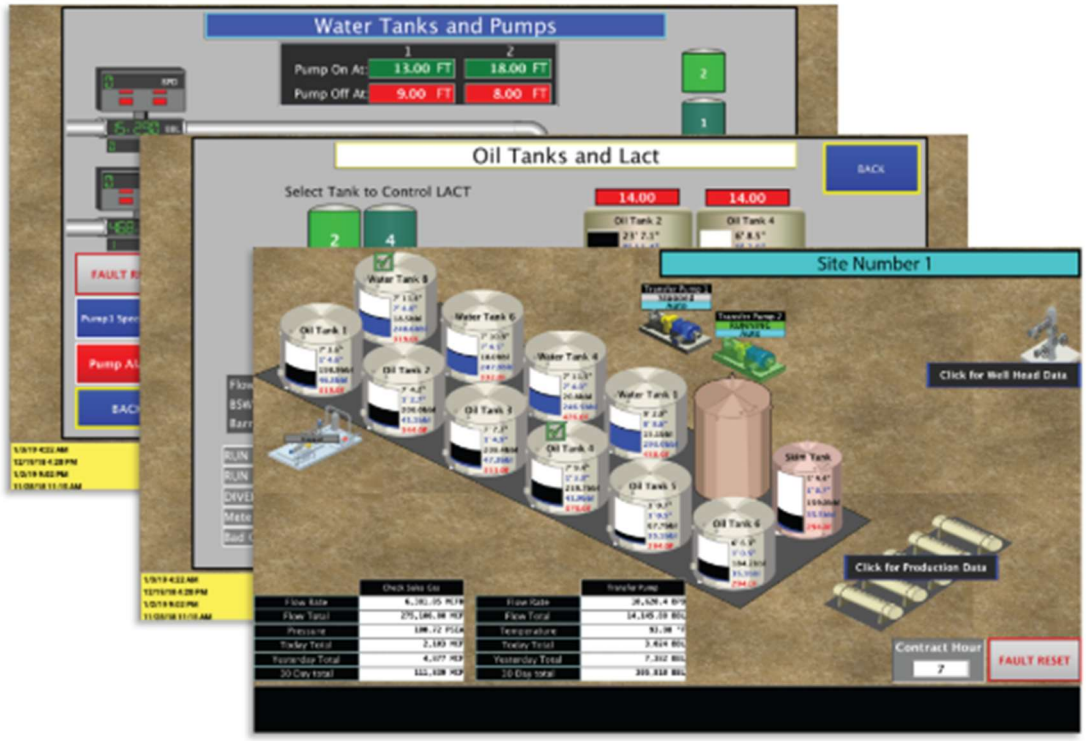
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated).

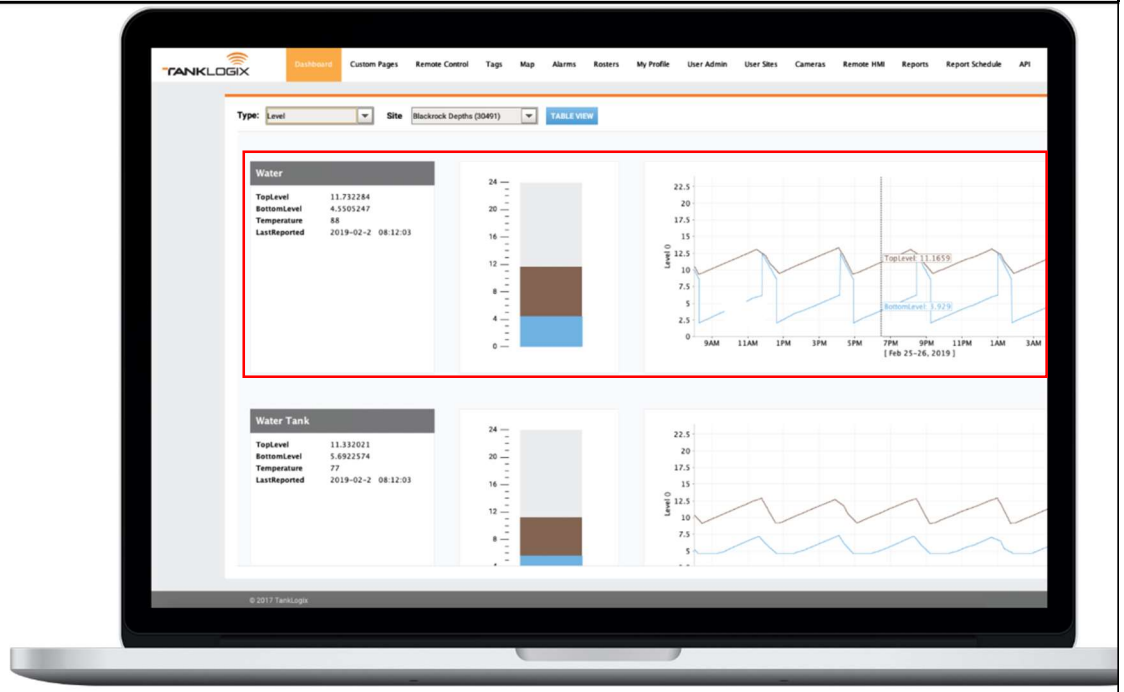
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. *See also, e.g.*, claim element 1.9 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.12] the fourth account corresponds to the second group of oil or gas facilities, users of the fourth account being authorized to view reports of data from fluid handling devices at the second group of oil or gas facilities.	In the Accused System, the fourth account corresponds to the second group of fluid-handling facilities, one or more users of the of the fourth account being authorized to view reports of data from fluid handling devices at the second group of fluid-handling facilities. *See, e.g.*:

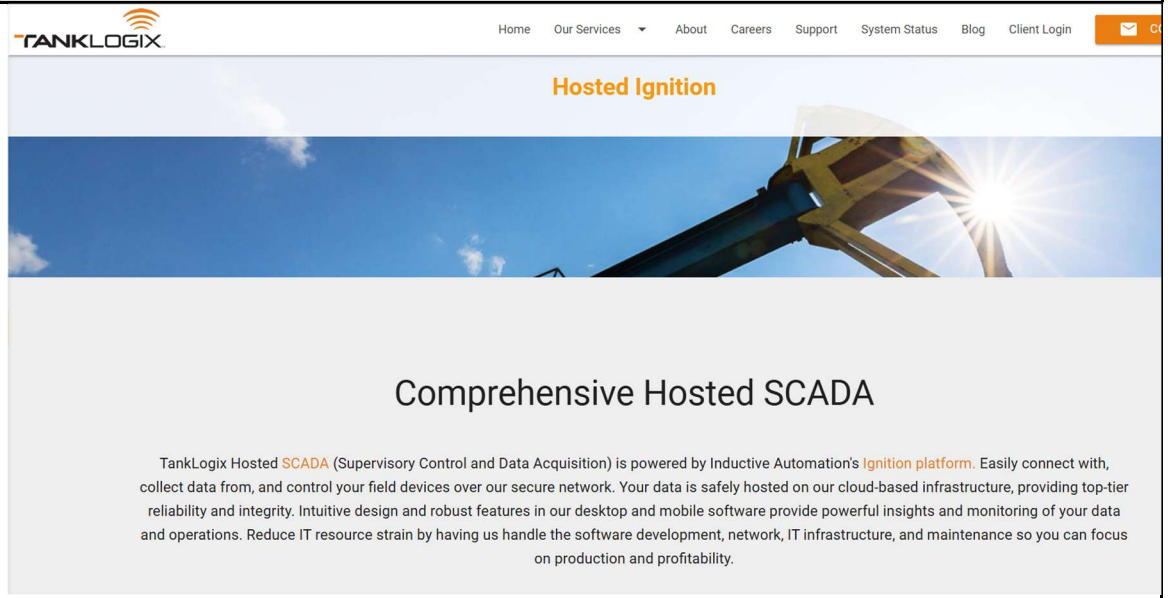
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated).

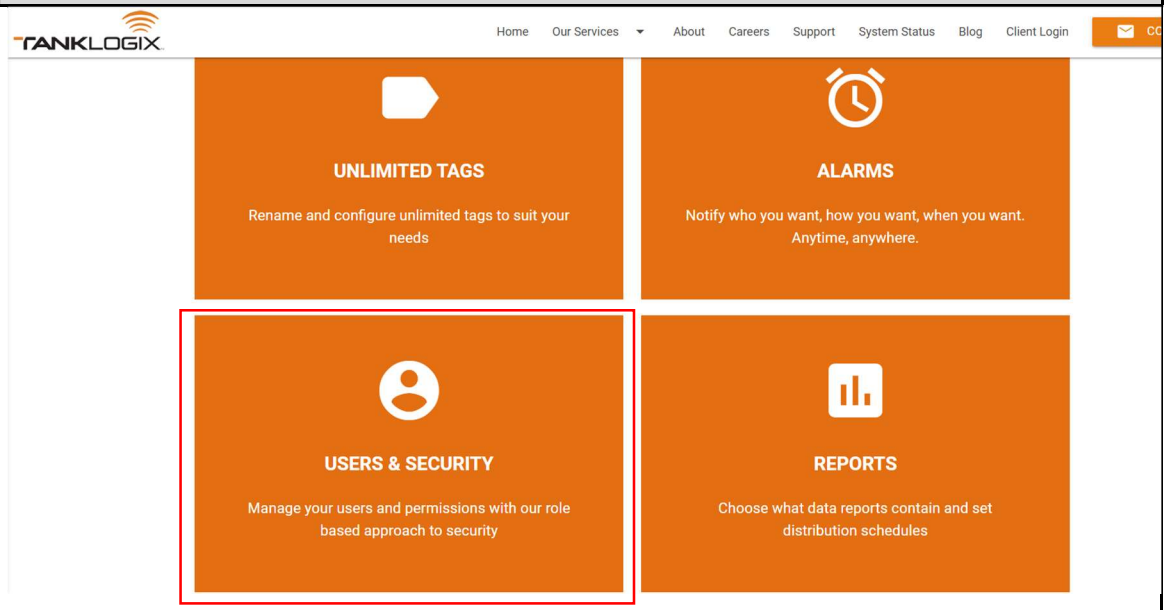
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated).

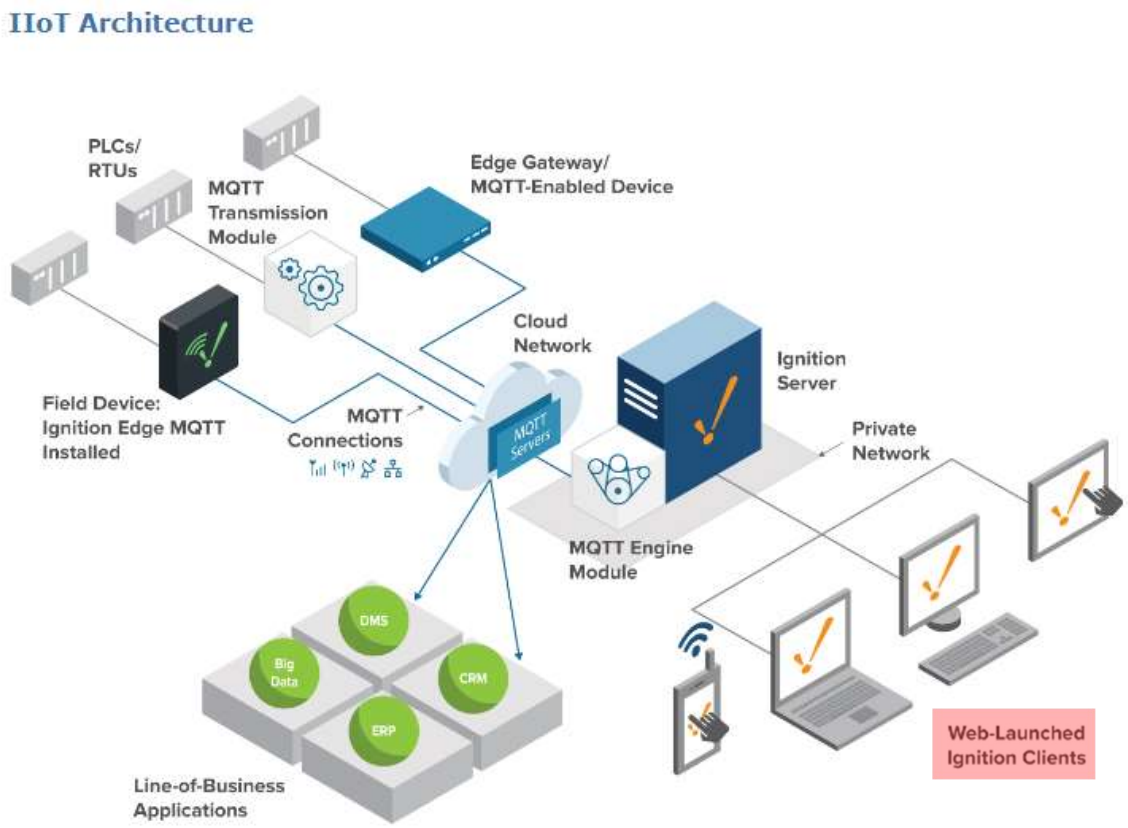
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. *See, e.g.*, claim element 1.12 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 2	
[2.1] The system of claim 1, wherein the sensors include a tank level sensor of a tank at one of the facilities, and wherein the datastore includes a record associating the tank with the facility,	In the Accused System, the sensors include a tank level sensor of a tank at one of the facilities, wherein the datastore includes a record associating the tank with the facility, and wherein the datastore includes a record associating the tank with the facility, data

U.S. Patent No. 9,898,014	The TankLogix System
data from the tank being unavailable to users without an account associated with the tank, and wherein the accounts:	from the tank being unavailable to users without an account associated with the tank. *See, e.g.*: *See* claim 1 above. 

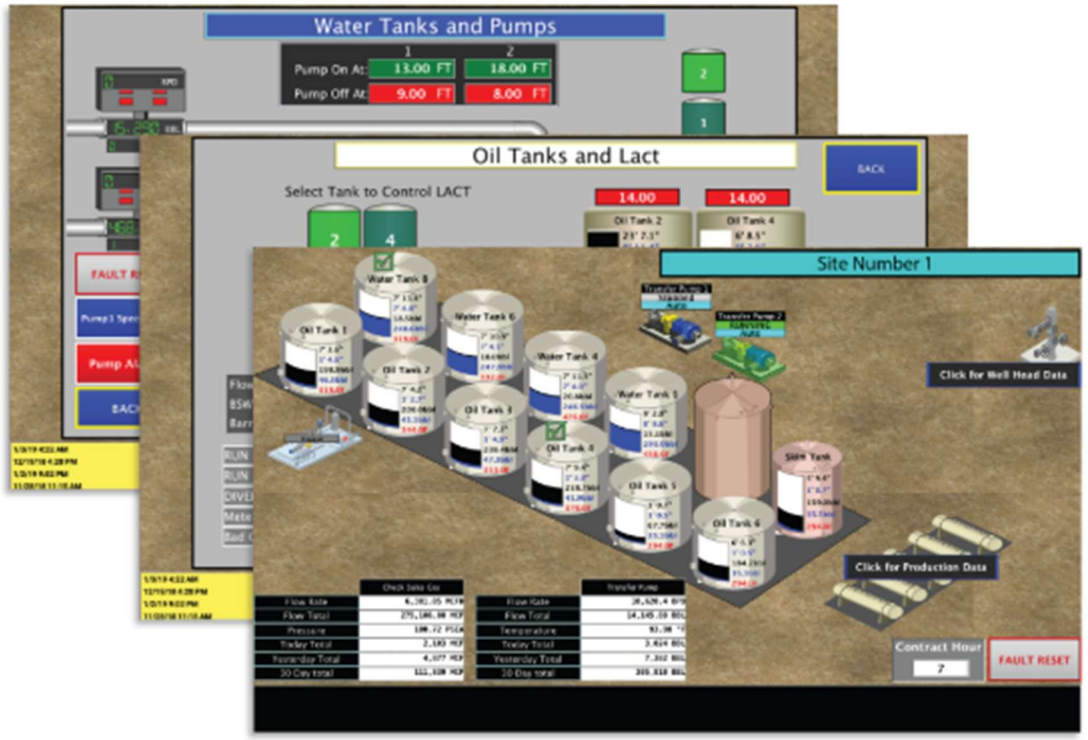
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. The above figures depict tank level measurements retrieved from sensors in the Accused System, associating the tanks with the facility (e.g., “Site Number 1”). Moreover, the below figures demonstrate the Accused System provides user access control, and allows users to access only their account’s information, including tank data.

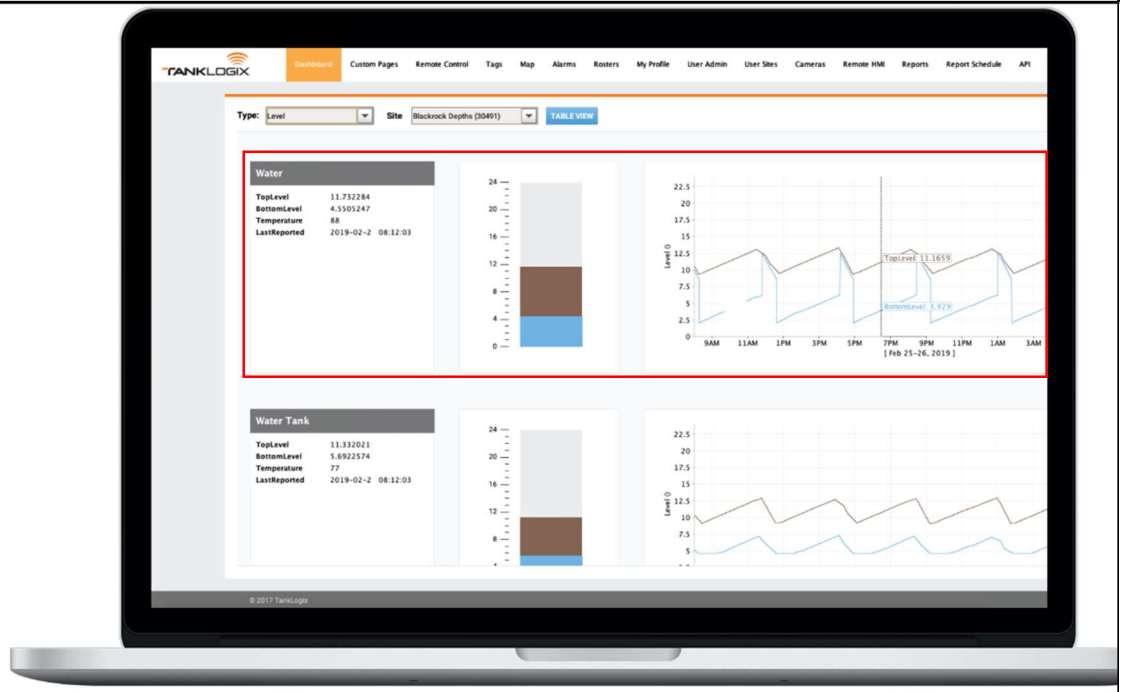
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. On information and belief, the Accused System provides access to TankLogix customer organizations to monitor fluid handling sites.

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[2.2] designate oil or gas facilities to which a given user is authorized to send	In the Accused System, the accounts designate oil or gas facilities to which a given user is authorized to send the user command to actuate the actuator. *See, e.g.*:

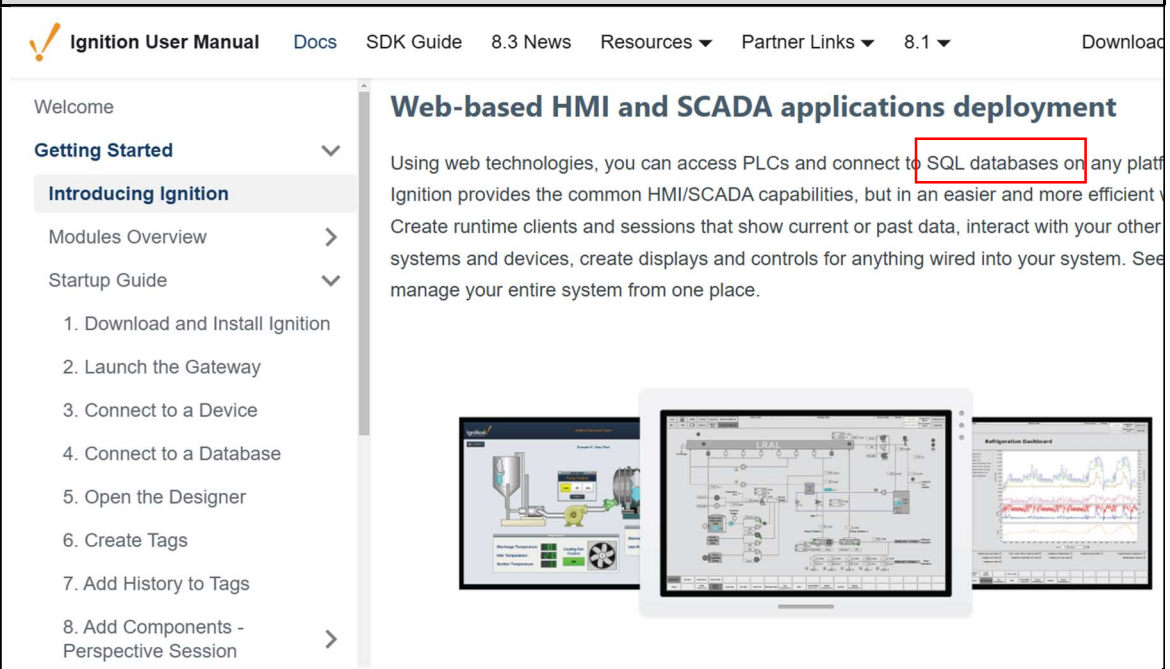
U.S. Patent No. 9,898,014	The TankLogix System
the user command to actuate the actuator.	*See* claim element 2.1 above. A given user is authorized to send a user command to a facility. The command is sent from a user device using, for example, a Web-Launched Ignition Client in the schematic below (highlighting added).  Exhibit 4.

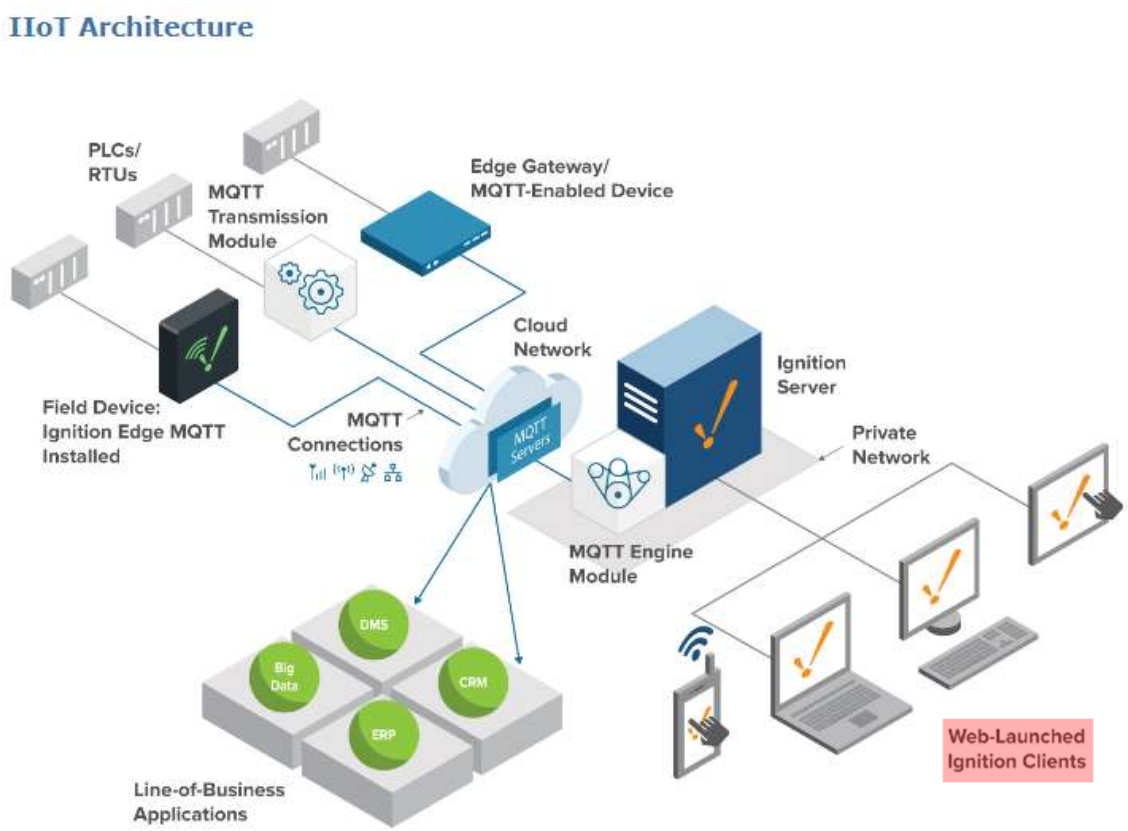
U.S. Patent No. 9,898,014	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 3	
[3] The system of claim 1, wherein the sensors include a level sensor of an oil/water separation tank at one of the facilities configured to indicate a level at which oil meets water, and wherein the datastore includes a record associating the tank with the facility.	In the Accused System, the sensors include a level sensor of an oil/water separation tank at one of the facilities configured to indicate a level at which oil meets water, wherein the datastore includes a record associating the tank with the facility. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 9,898,014	The TankLogix System
	

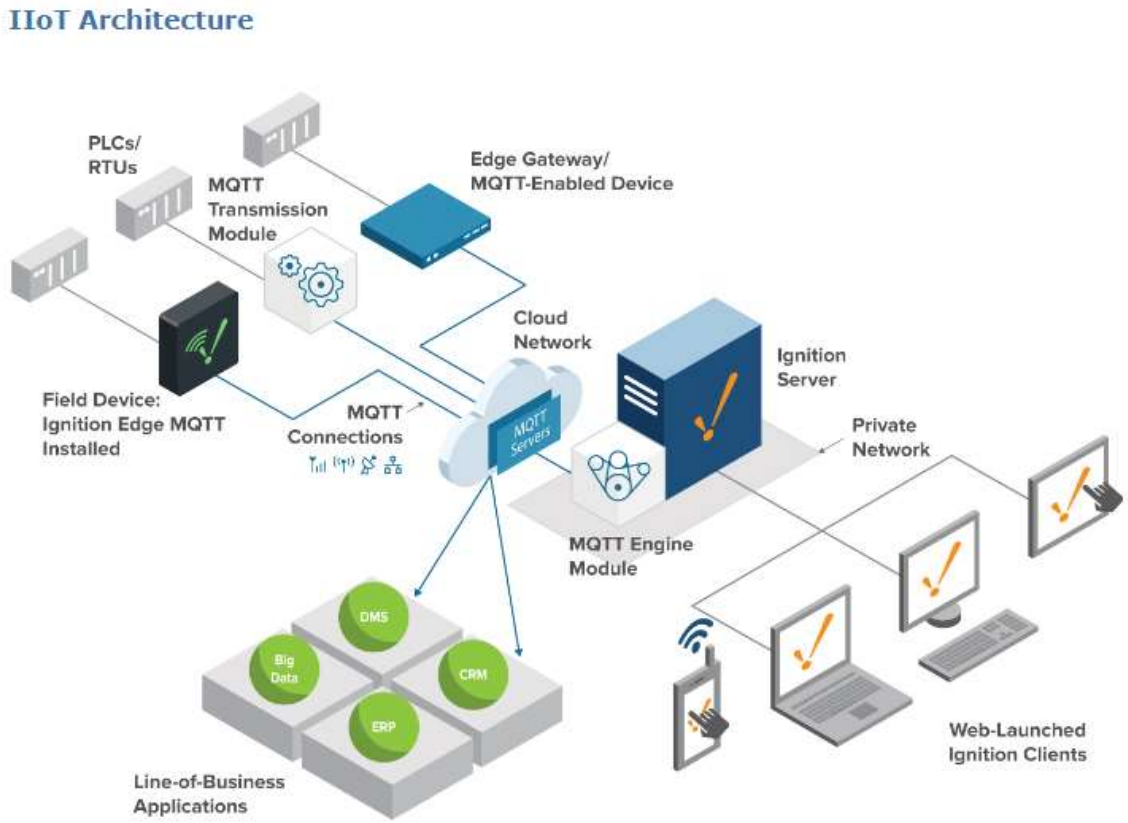
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. The above figures depict tank level measurements retrieved from sensors in the Accused System, including level measurements indicating where oil meets water. These data records associate the tanks with the facility (e.g., “Site Number 1”). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro’s current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

U.S. Patent No. 9,898,014	The TankLogix System
Claim 4	
[4] The system of claim 1, wherein the sensors include a leak detector at one of the facilities, and wherein the datastore includes a record associating the leak detector with the facility.	In the Accused System, the sensors include a leak detector at one of the facilities, and wherein the datastore includes a record associating the leak detector with the facility. *See, e.g.*: *See* claim 1 above. Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) Title 40, Part 112-3 states that every company or facility must have an updated spill prevention, control, and countermeasure plan. The TankWarden System can help tank owners develop a sophisticated approach to developing and implementing a prevention and control plan to satisfy the US Government's requirements. Therefore, the leak detection ability of the TankWarden can reduce the risk exposure to fines, expensive cleanups, and denied prevention plans issued by the EPA. Exhibit 5. As described in the example above, the Accused System includes a leak detector at its facilities. The Accused System also includes a datastore, as shown below:

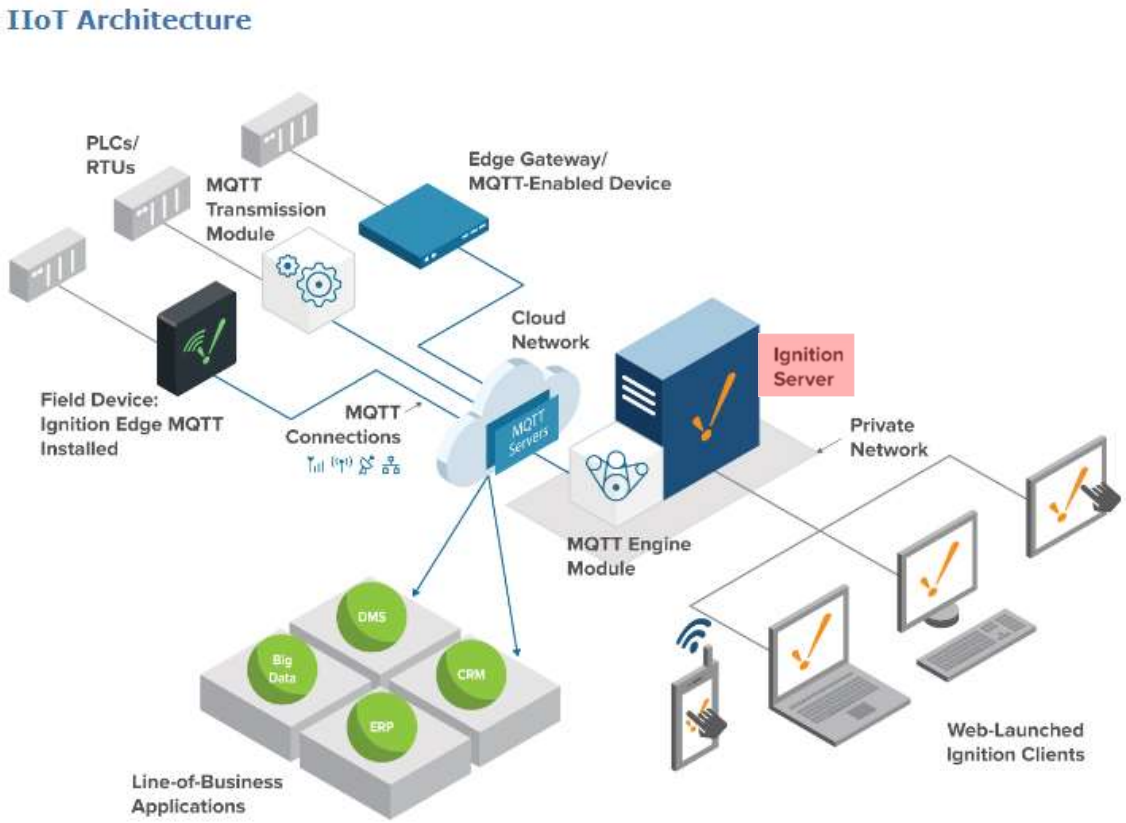
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 5	

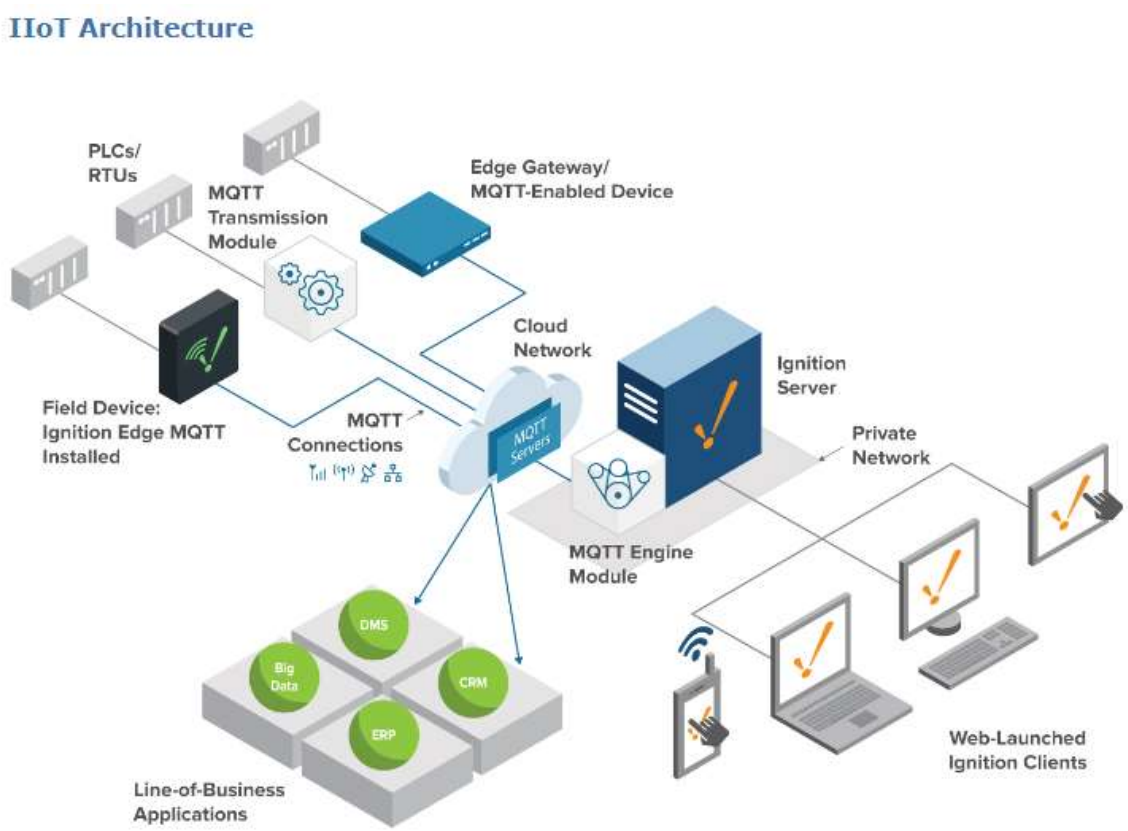
U.S. Patent No. 9,898,014	The TankLogix System
[5.1] The system of claim 1, wherein: the web-interface module or modules comprises a web server; and	In the Accused System, the web-interface module or modules comprises a web server. *See, e.g.*: *See* claim 1 above. The web server is, e.g., the Ignition Server, which is used by the Web-Launched Ignition Clients shown by the schematic below (highlighting added). 

U.S. Patent No. 9,898,014	The TankLogix System
	Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[5.2] the facility-interface module or modules comprises a site server distinct from the web server.	In the Accused System, the facility-interface module or modules comprises a site server distinct from the web server. The web server (e.g., the Ignition Server shown by the schematic below) is distinct from the site server (e.g., Ignition Edge module or PLC). *See, e.g.*:

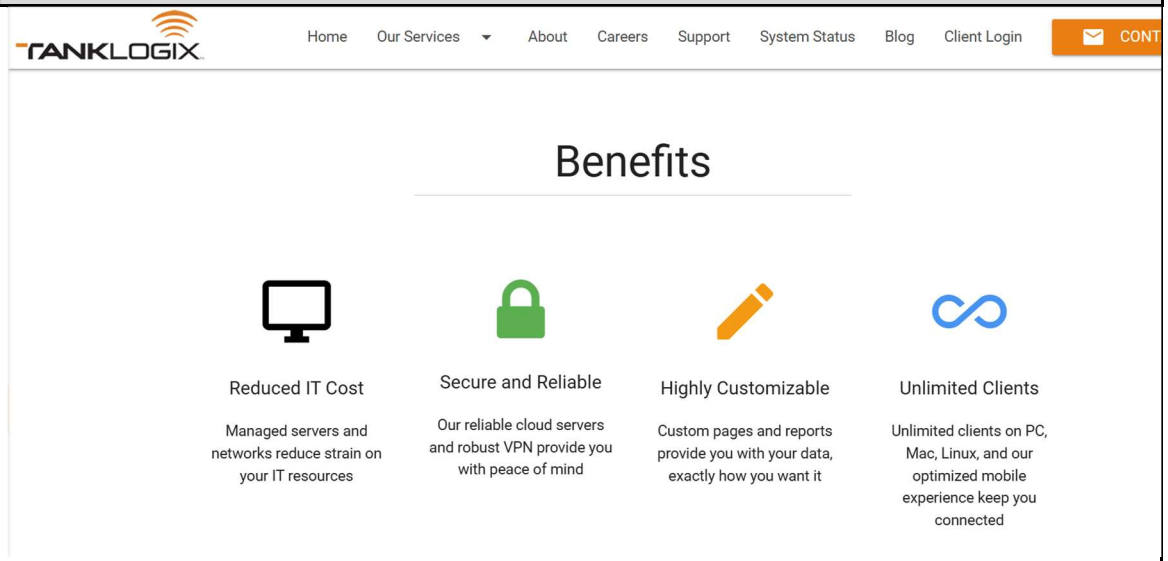
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. *See also, e.g.*, claim element 1.4 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

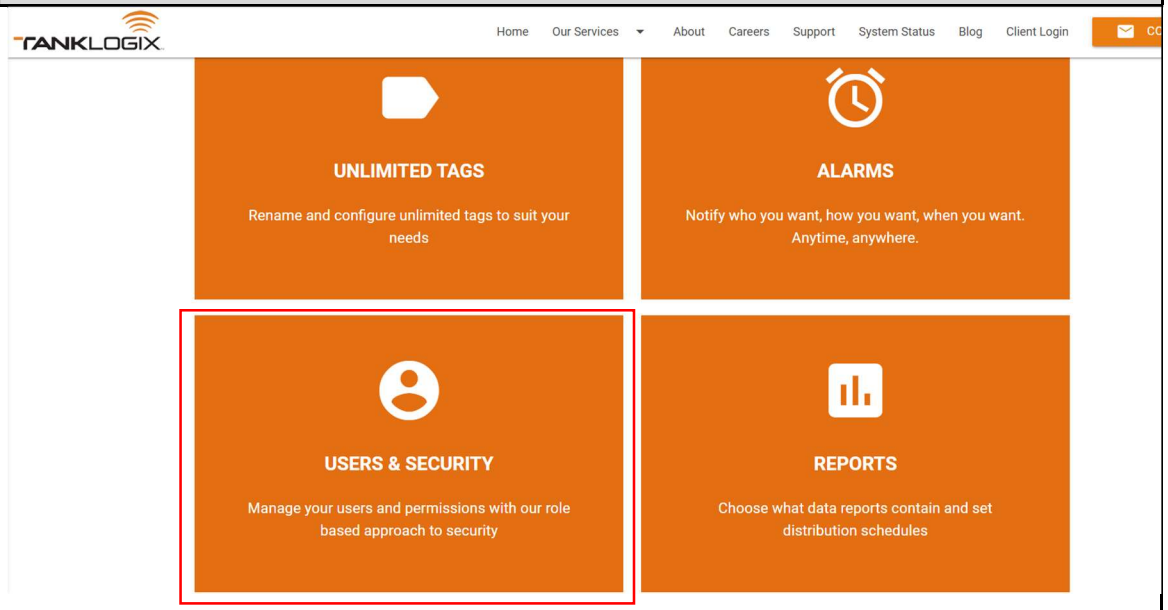
U.S. Patent No. 9,898,014	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 6	
[6.1] The system of claim 5, wherein: the web server communicates with user devices via a first network port of a computing device executing the web server; and	In the Accused System, the web server communicates with user devices via a first network port of a computing device executing the web server. *See, e.g.*: *See* claim 5 above.

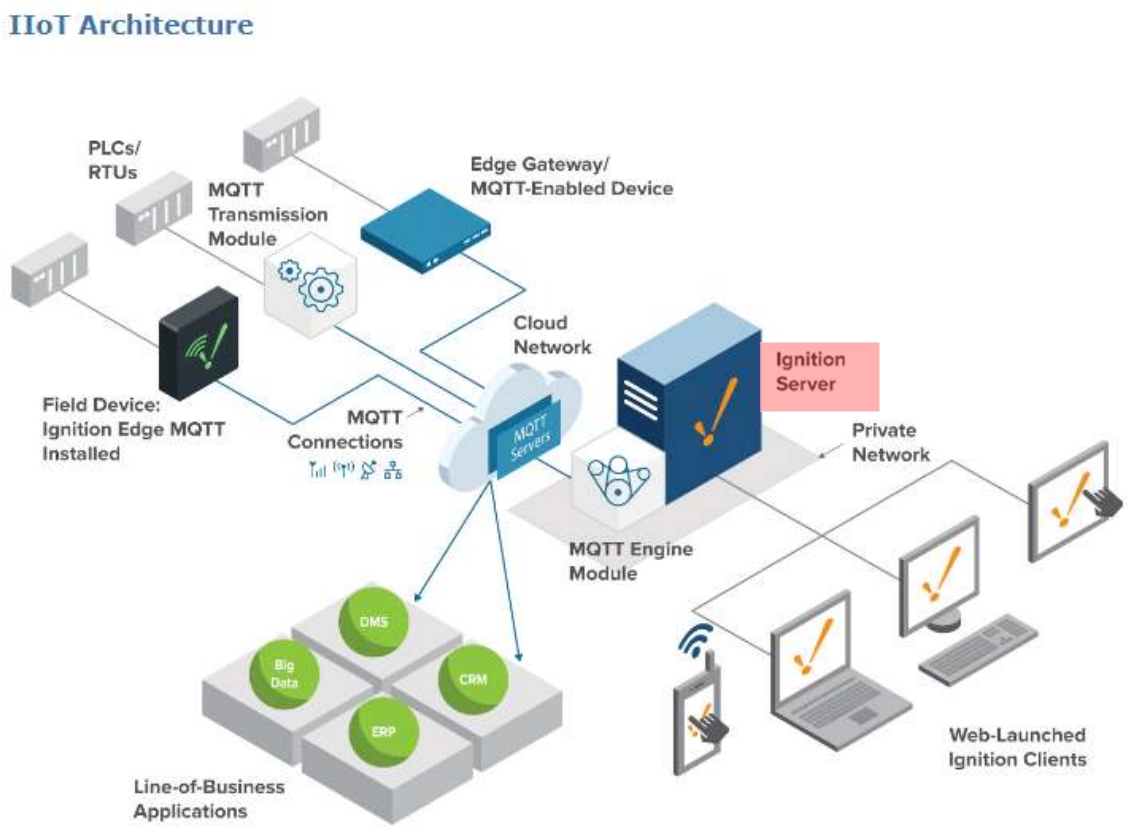
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. The Ignition Server depicted above communicates with user devices via a network port on the web server, as shown. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 9,898,014	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[6.2] the site server communicates with facilities via a second network port of the computing device, the second network port being different from the first network port.	In the Accused System, the site server communicates with facilities via a second network port of the computing device, the second network port being different from the first network port. *See, e.g.*: 

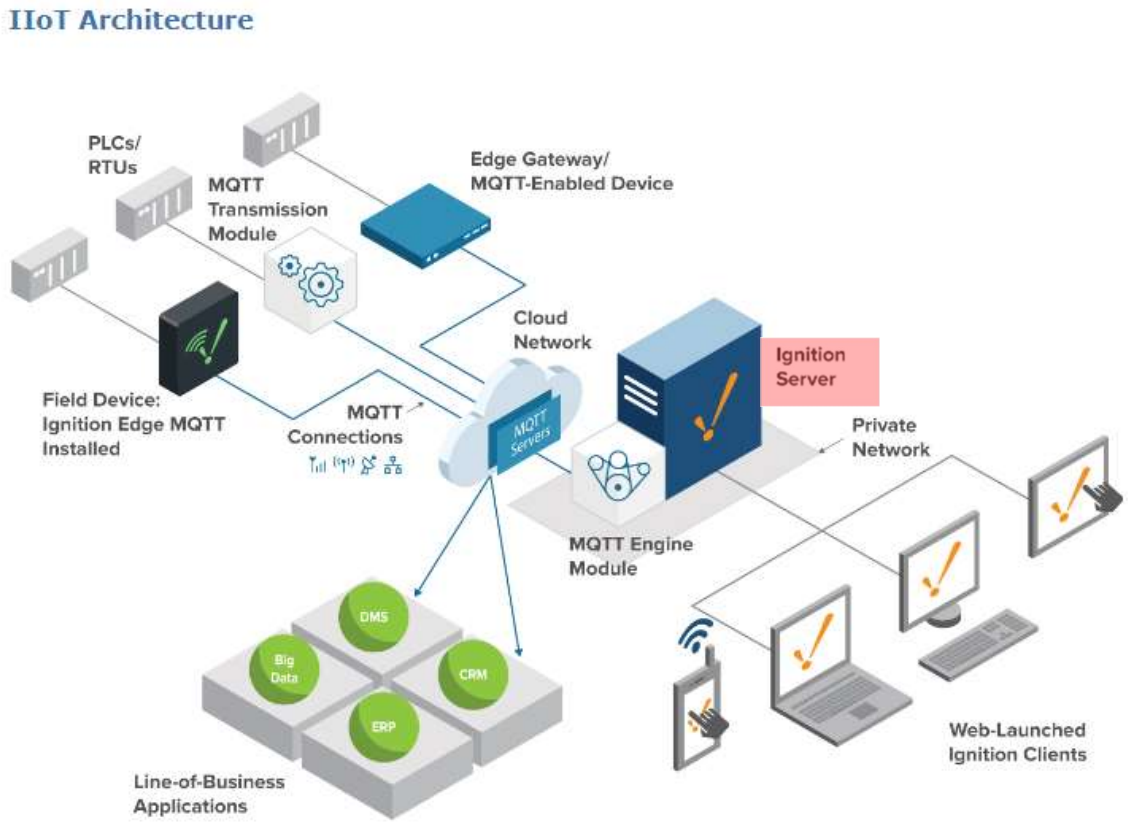
U.S. Patent No. 9,898,014	The TankLogix System
	Exhibit 4. As shown in the above schematic, the site server (e.g., PLC or Ignition Edge module) communicates with facilities via a network port distinct from the one used by the Ignition Server to communicate with client devices. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 7	
[7] The system of claim 1, wherein: the data store stores subscription information associated with at least some of the accounts.	In the Accused System, the data store stores subscription information associated with at least some of the accounts. *See, e.g.*: *See* claim 1 above.

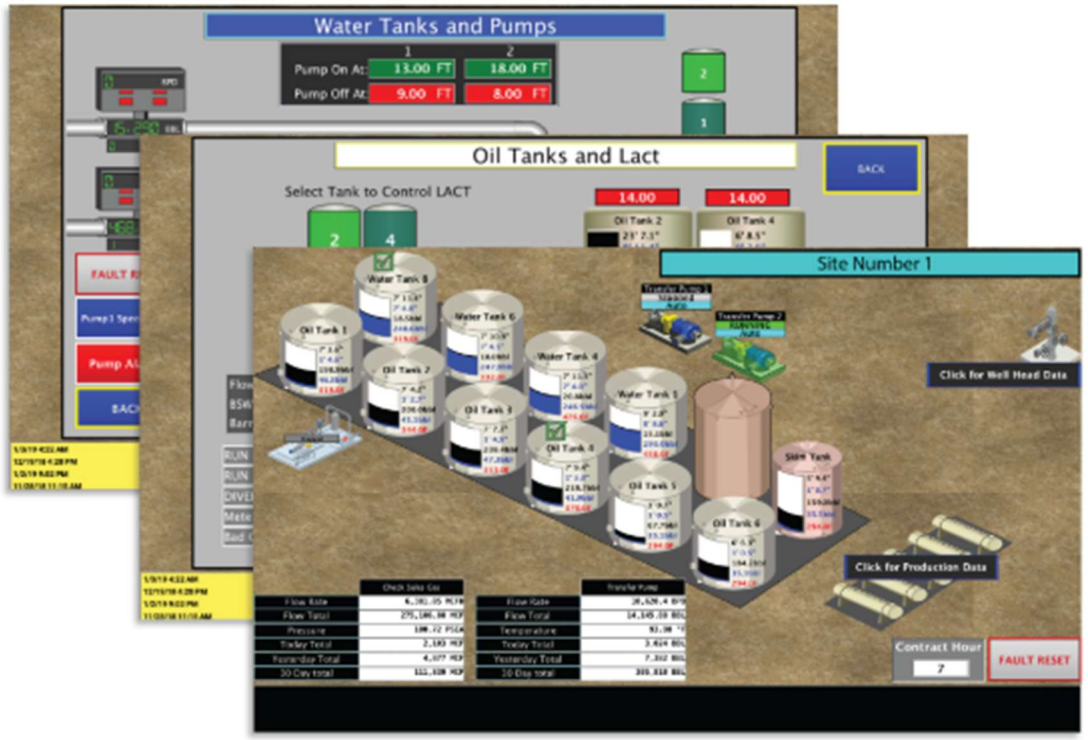
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated).

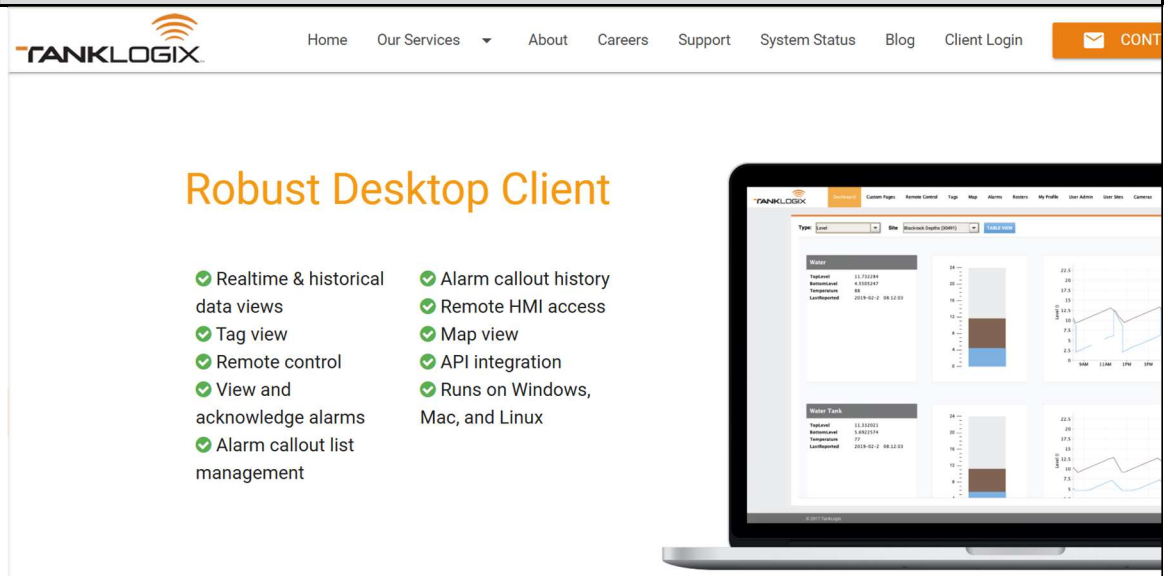
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1 (annotated). On information and belief, the Accused System stores subscription information associated with user accounts in order to provide access to user site and device information on the Accused System. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 8	

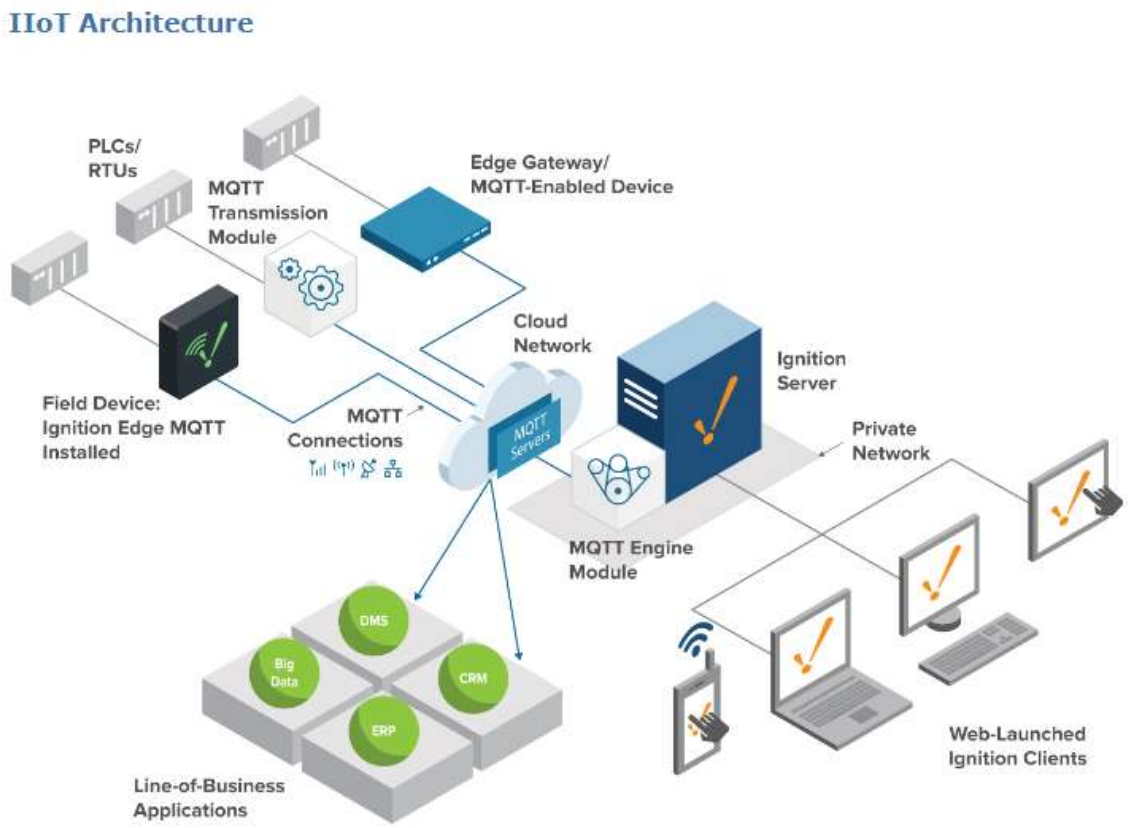
U.S. Patent No. 9,898,014	The TankLogix System
[8] The system of claim 1, wherein the facility-interface module or modules comprise: means for interfacing with a plurality of site controllers associated with the facilities.	In the Accused System, the facility-interface module or modules comprise means for interfacing with a plurality of site controllers associated with the facilities. *See, e.g.*: *See* claim 1 above. For example, the Ignition Server shown by the schematic below includes a facility-interface module or modules that interface with a plurality of site controllers (e.g., Ignition Edge modules or PLCs) associated with the facilities (highlighting added). 

U.S. Patent No. 9,898,014	The TankLogix System
	Exhibit 4. *See also, e.g.*, claim element 1.4 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 9	
[9] The system of claim 1, wherein the web-interface module or modules comprise: means for sending instructions to present a control interface on the user devices.	In the Accused System, the web-interface module or modules comprise means for sending instructions to present a control interface on the user devices. *See, e.g.*: *See* claim 1 above.

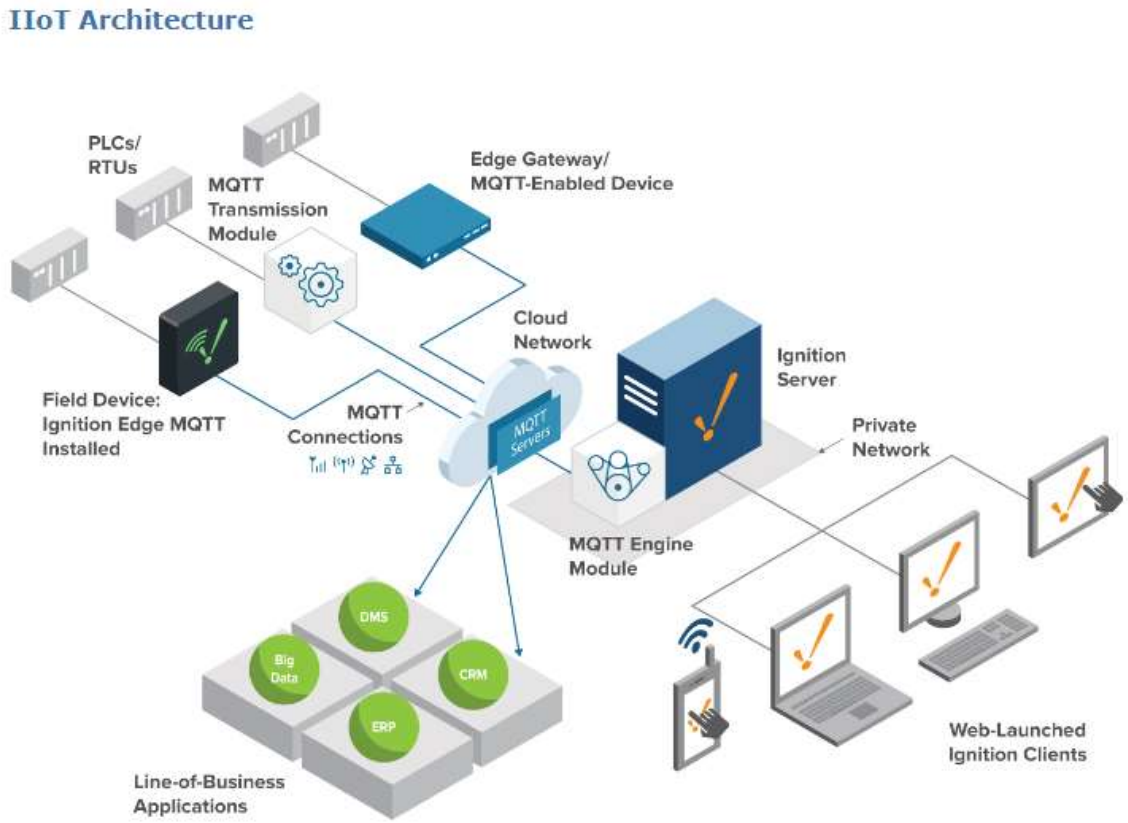
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4.

U.S. Patent No. 9,898,014	The TankLogix System
	

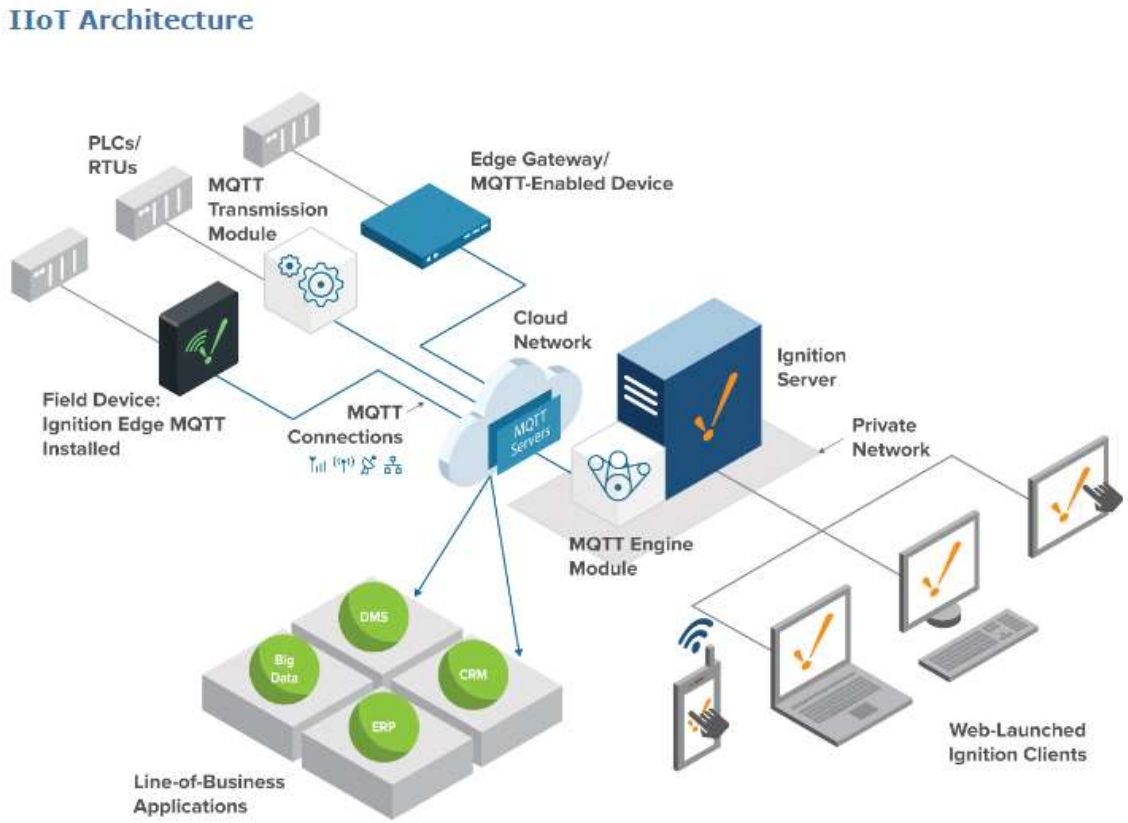
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. The above images demonstrate that the Accused System presents a control interface to users that allows for, *inter alia*, "remote control," "realtime & historical data views," "remote HMI access." The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 10	

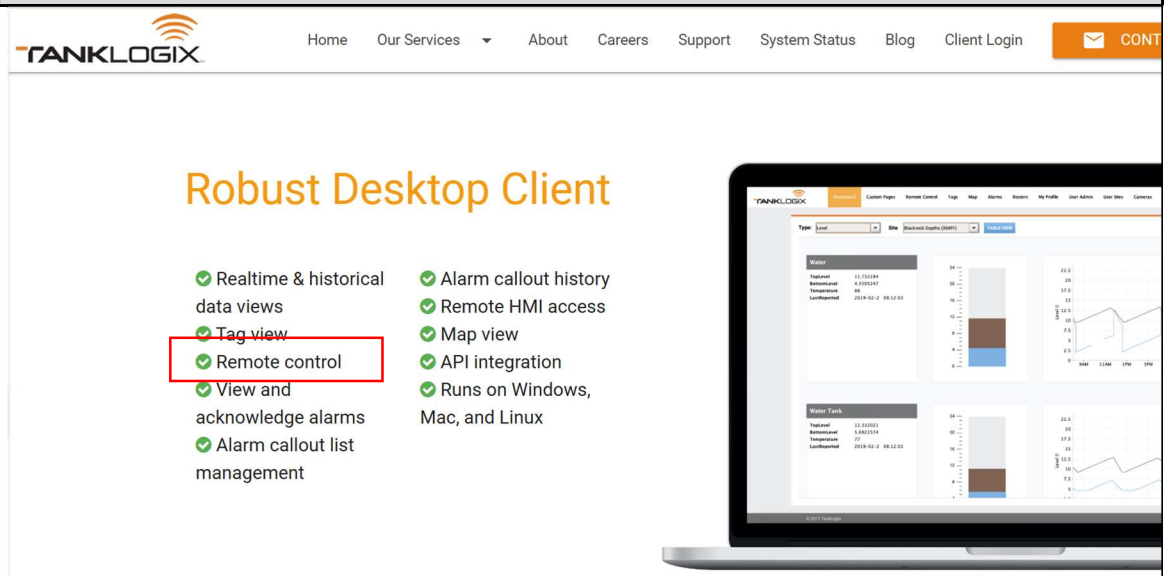
U.S. Patent No. 9,898,014	The TankLogix System
[10] The system of claim 1, wherein the datastore stores accounts for more than one hundred facilities, and the web-interface module or modules are configured interface with more than one hundred user devices.	In the Accused System, the datastore stores accounts for more than one hundred facilities, and the web-interface module or modules are configured interface with more than one hundred user devices. *See, e.g.*: *See* claim 1 above. 

U.S. Patent No. 9,898,014	The TankLogix System
	Exhibit 4. On information and belief, the Accused System comprises more than 100 facilities and more than 100 user devices. The above schematic demonstrates that the system is configured to support multiple facilities and user devices. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 11	
[11] The system of claim 1, wherein the facility-interface module or modules are configured to send pull requests to facilities to retrieve data buffered at the facilities.	In the Accused System, the facility-interface module or modules are configured to send pull requests to facilities to retrieve data buffered at the facilities. *See, e.g.*: *See* claim 1 above. The Ignition Server shown by the schematic below includes a facility-interface module or modules.

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. The PLCs and/or Ignition Edge modules at each facility buffer data collected from devices at each site, and the facility-interface module is configured to pull buffered data stored at the facilities. *See also, e.g.*, claim element 1.4 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a

U.S. Patent No. 9,898,014	The TankLogix System
	manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 12	
[12] The system of claim 1, comprising: a controller at one of the facilities communicatively coupled to an actuator or a sensor.	The Accused System includes a controller at one of the facilities communicatively coupled to an actuator or a sensor. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. The controller (e.g., PLC) is coupled to sensors and actuators at each facility.

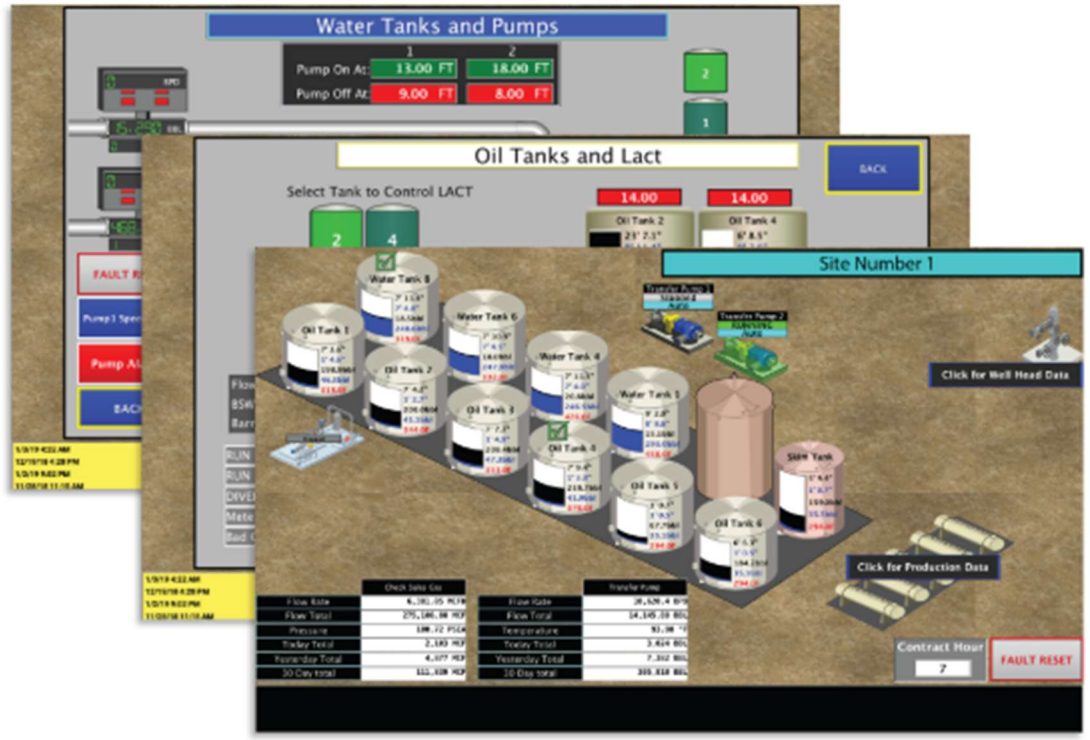
U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. The controller is coupled to sensors and actuators in order to provide the above-mentioned remote control of devices via actuators and data views using sensor data. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 13	

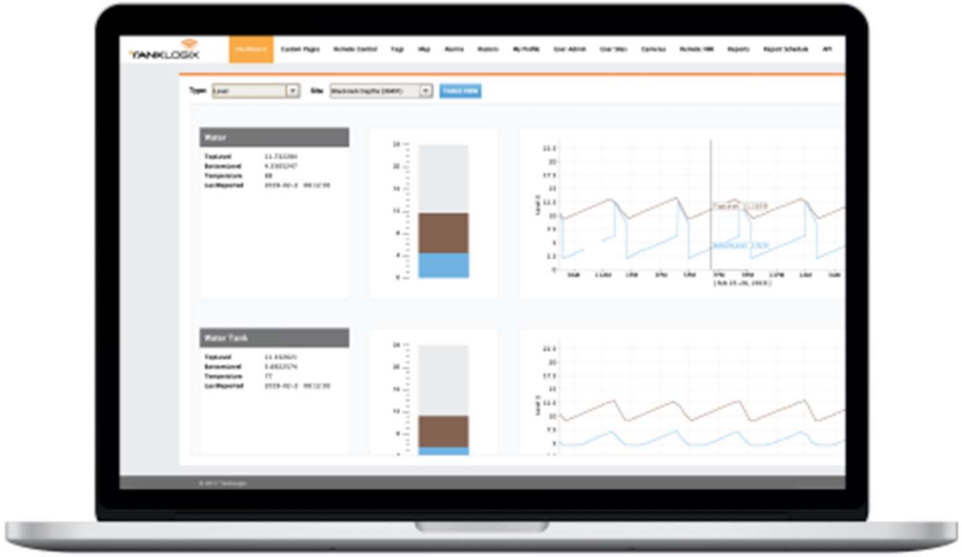
U.S. Patent No. 9,898,014	The TankLogix System
[13.1] The system of claim 12, wherein the system is configured to instantiate at least four of the following as distinct threads from one another:	The Accused System is configured to instantiate at least four threads as distinct threads from one another. *See, e.g.*: *See* claim 12 above. The Accused System includes several components, each running distinct threads, including at least: • Ignition Server • Ignition Gateway • User devices • Fluid-handling devices • PLCs • Ignition Edge modules The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[13.2] a thread configured to sends and receive data requests;	The Accused System includes a thread configured to sends and receive data requests. *See also, e.g.*, claim element 13.1 above. The Accused System includes several components that instantiate a thread to send and receive data requests, including: • Ignition Server • Ignition Gateway • User devices • Fluid-handling devices

U.S. Patent No. 9,898,014	The TankLogix System
	• PLCs • Ignition Edge modules The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[13.3] a thread configured to synchronize other threads with updated information;	The Accused System includes a thread configured to synchronize other threads with updated information. *See, e.g.*: Edge Sync Services Ignition Edge Sync Services acts as a limited remote server that synchronizes data from the edge of the network to a central Ignition server. • Remote tags • Tag history sync • Alarm journal sync • Audit log sync • Remote alarm notification profiles

U.S. Patent No. 9,898,014	The TankLogix System
	Data Synchronization Synchronization allows you to sync your historian data, audit records, and alarm journal entries from the Edge Gateway to a Standard Ignition Gateway, allowing you to save past the internal data limit. The Edge Gateway will still only see the 35 days of Tag History and 7 days of Alarm Journal and Audit Log data that it can hold, but it will allow you to store the data in a more permanent database that can be viewed from other Ignition systems. Exhibit 7. As described above, at least the Ignition Gateway performs data synchronization tasks, which operate to synchronize other threads with updated information. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[13.4] a thread configured to set a target state of actuators;	The Accused System includes a thread configured to set a target state of actuators. *See, e.g.*: The Accused System includes several components that instantiate threads to set a target state of actuators, including: • Ignition Server • Ignition Gateway • User devices • Fluid-handling devices, including devices with VFDs • PLCs • Ignition Edge modules

U.S. Patent No. 9,898,014	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[13.5] a thread configured to obtain updated sensor readings;	The Accused System includes a thread configured to obtain updated sensor readings. *See, e.g.*: The Accused System includes several components that instantiate threads to obtain updated sensor readings, including: • Ignition Server • Ignition Gateway • User devices • Fluid-handling devices • PLCs • Ignition Edge modules

U.S. Patent No. 9,898,014	The TankLogix System
	

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[13.6] a thread configured to process user interactions; and	The Accused System includes a thread configured to process user interactions. *See, e.g.*:

U.S. Patent No. 9,898,014	The TankLogix System
	The Accused System includes several components that instantiate threads to process user interactions, including: • Ignition Server • Ignition Gateway • User devices • Fluid-handling devices • PLCs • Ignition Edge modules

U.S. Patent No. 9,898,014	The TankLogix System

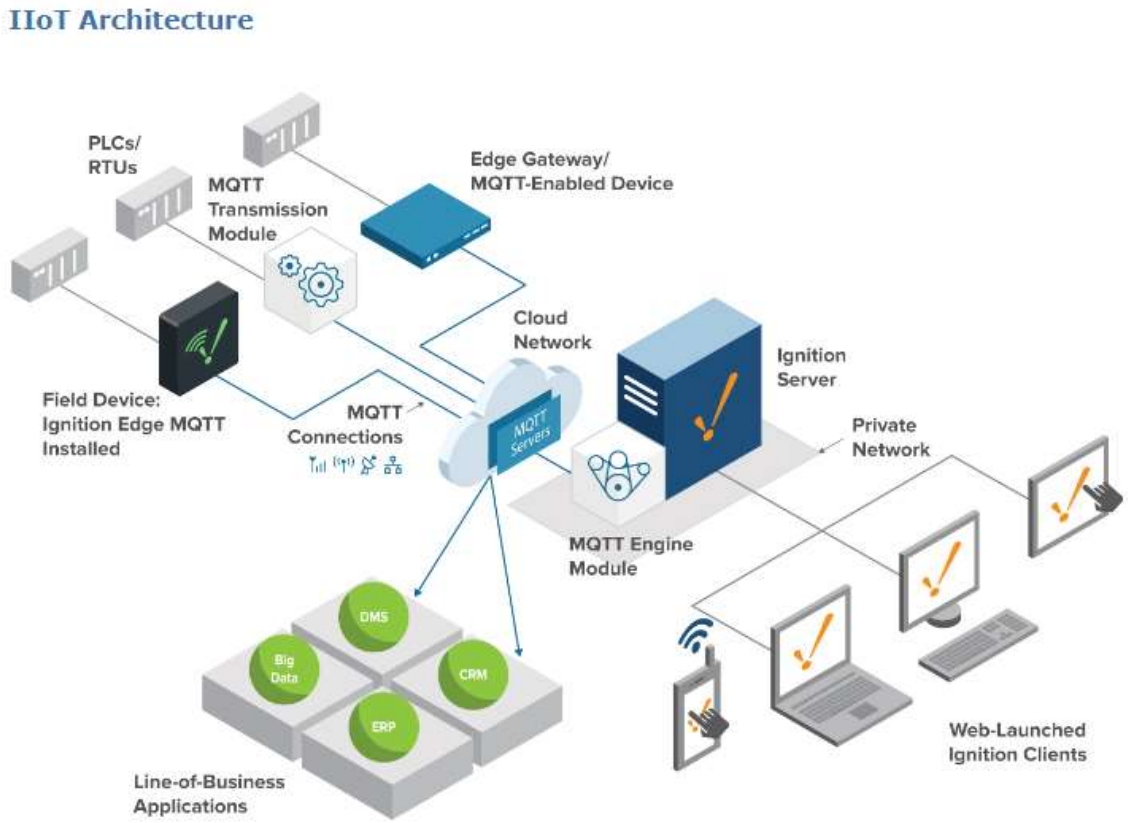
	# Component Events and Actions
	
	In Perspective, events and actions are some of the fundamental building blocks of project functionality. Actions give you the ability to respond to specific user inputs (such as mouse, keyboard, and touch inputs), as well as broad session events (like the beginning and end of the session) in many different ways. Thus, *actions* are a response to *events*.
	
	Example uses for events and actions include:
	
	• Navigating to a new page when the user presses a button.
	• Opening a popup containing details on a specific PLC when a user double-clicks on it in a diagram.
	• Logging the user out of the session when they press Ctrl + L on the keyboard.
	• Scanning a barcode from a mobile device, and sending it to the Gateway.
	
	In this section, we'll cover the basics on how to configure actions and events to suit your project's needs.
	
	## Configure Events and Actions
	
	To configure an event and action on a component:
	
	On this page ...
	
	• Configure Events and Actions
	• Perspective Events
	• Action Types
	• Shared Action Options
	• Action Setting Reference
	  • Accelerometer Action
	  • Alter Logging Action
	  • Alter Dock
	  • Dock Action
	  • Fullscreen Action
	  • Login and Logout Actions
	  • Authentication Challenge Action
	
	Exhibit 8.

U.S. Patent No. 9,898,014	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[13.7] a thread that eliminates other threads upon detecting a problem with the eliminated threads.	The Accused System includes a thread that eliminates other threads upon detecting a problem with the eliminated threads. *See, e.g.*: The Accused System includes several components that instantiate threads to eliminate other threads upon detecting a problem with the eliminated threads, including: • Ignition Server • Ignition Gateway • User devices • Ignition Edge modules • Fluid-handling devices • PLCs These components instantiate threads that eliminate other threads at least as part of the normal behavior of the operating systems running on these components. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

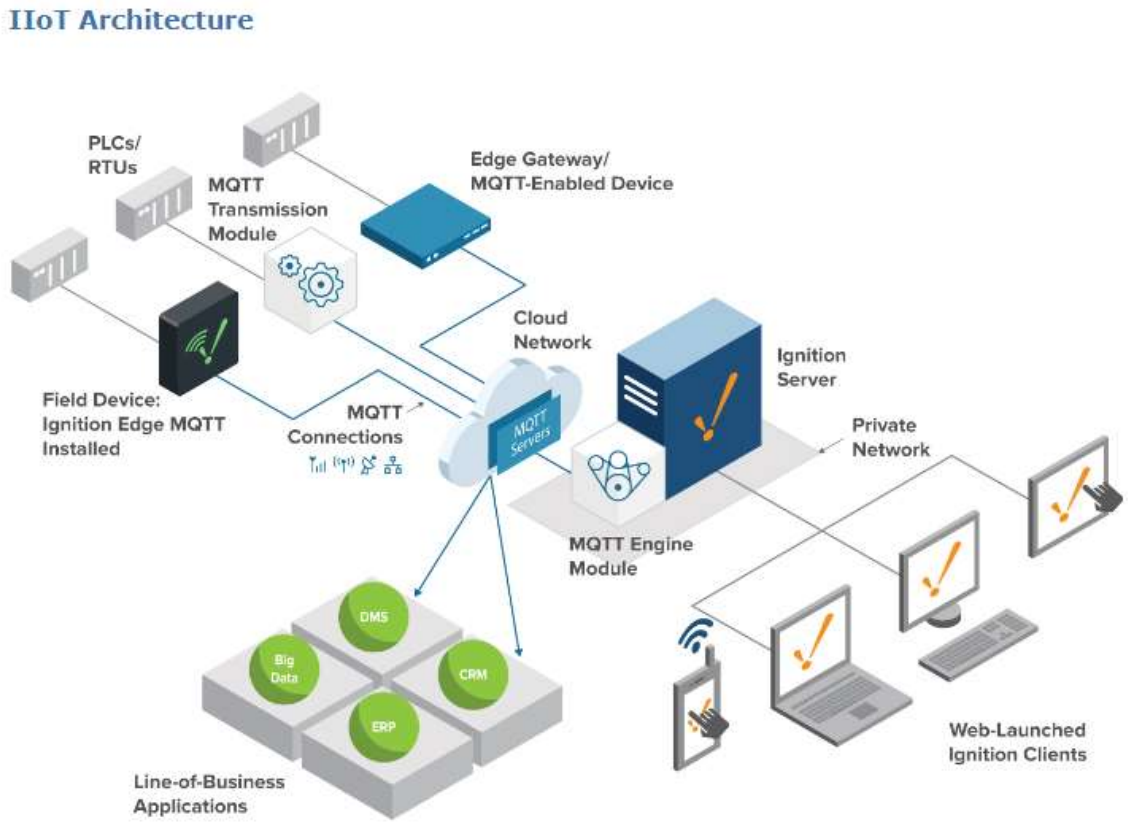
U.S. Patent No. 9,898,014	The TankLogix System
Claim 14	
[14.1] The system of claim 12, wherein the system is configured to instantiate at least two of the following as distinct threads from one another:	The Accused System is configured to instantiate at least two threads as distinct threads from one another. *See* claim 12 above. *See, e.g.*, claim element 13.1 above.
[14.2] a thread configured to sends or receive data request;	The Accused System includes a thread configured to send or receive data requests. *See, e.g.*, claim element 13.2 above.
[14.3] a thread configured to synchronize other threads with updated information;	The Accused System includes a thread configured to synchronize other threads with updated information. *See, e.g.*, claim element 13.3 above.
[14.4] a thread configured to set a target state of actuators;	The Accused System includes a thread configured to set a target state of actuators. *See, e.g.*, claim element 13.4 above.
[14.5] a thread configured to obtain updated sensor readings;	The Accused System includes a thread configured to obtain updated sensor readings. *See, e.g.*, claim element 13.5 above.
[14.6] a thread configured to process user interactions; and	The Accused System includes a thread configured to process user interactions. *See, e.g.*, claim element 13.6 above.
[14.7] a thread that eliminates other threads upon detecting a problem with the eliminated threads.	The Accused System includes a thread that eliminates other threads upon detecting a problem with the eliminated threads. *See, e.g.*, claim element 13.7 above.
Claim 15	

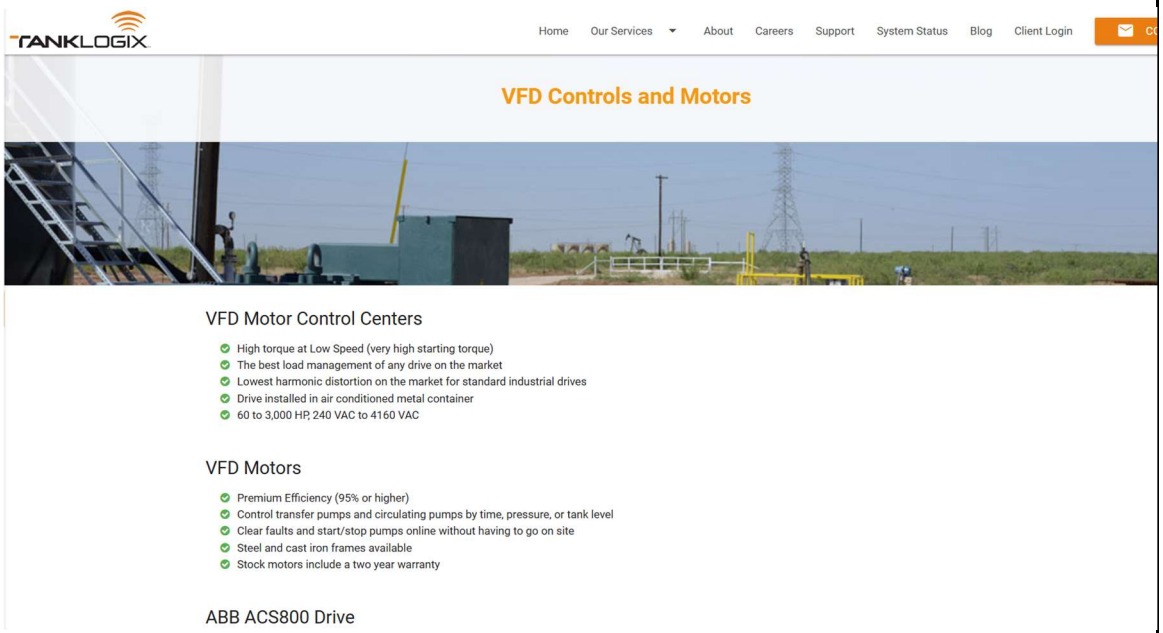
U.S. Patent No. 9,898,014	The TankLogix System
[15] The system of claim 12, wherein the controller is communicatively coupled to the actuator or sensor via a private local area network.	In the Accused System, the controller is communicatively coupled to the actuator or sensor via a private local area network. *See, e.g.*: *See* claim 12 above. Controllers (e.g., PLCs) in the Accused System are coupled to actuators or sensors at the facilities via local networks, including by private local area networks. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 16	
[16] The system of claim 12, wherein controller is communicatively coupled to the actuator or sensor via a frame-based carrier-sense multiple access protocol with collision detection.	In the Accused System, the controller is communicatively coupled to the actuator or sensor via a frame-based carrier-sense multiple access protocol with collision detection. *See, e.g.*: *See* claim 12 above. The Accused System, as an example, uses TCP/IP signals over a network bus for communications between the PLC and the network adapter used to communicate with actuators and sensors at the facilities. The TCP/IP protocol comprises a frame-based carrier-sense multiple access protocol with collision detection. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

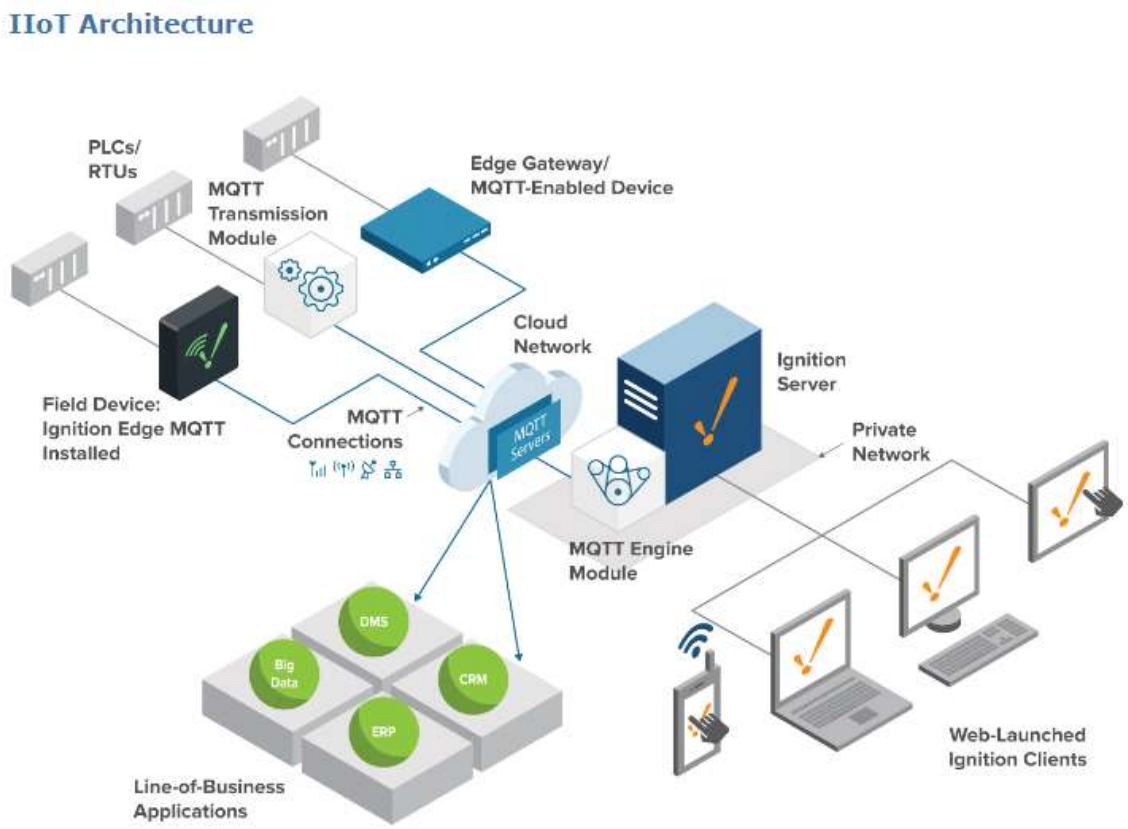
U.S. Patent No. 9,898,014	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 17	
[17] The system of claim 12, wherein controller is configured to periodically push buffered data to the facility-interface module or modules.	In the Accused System, the controller is configured to periodically push buffered data to the facility-interface module or modules. *See, e.g.*: *See* claim 12 above. The controller shown by the schematic below is configured to push buffered data to the facility-interface module or modules.

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. *See also, e.g.*, claim element 1.4 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

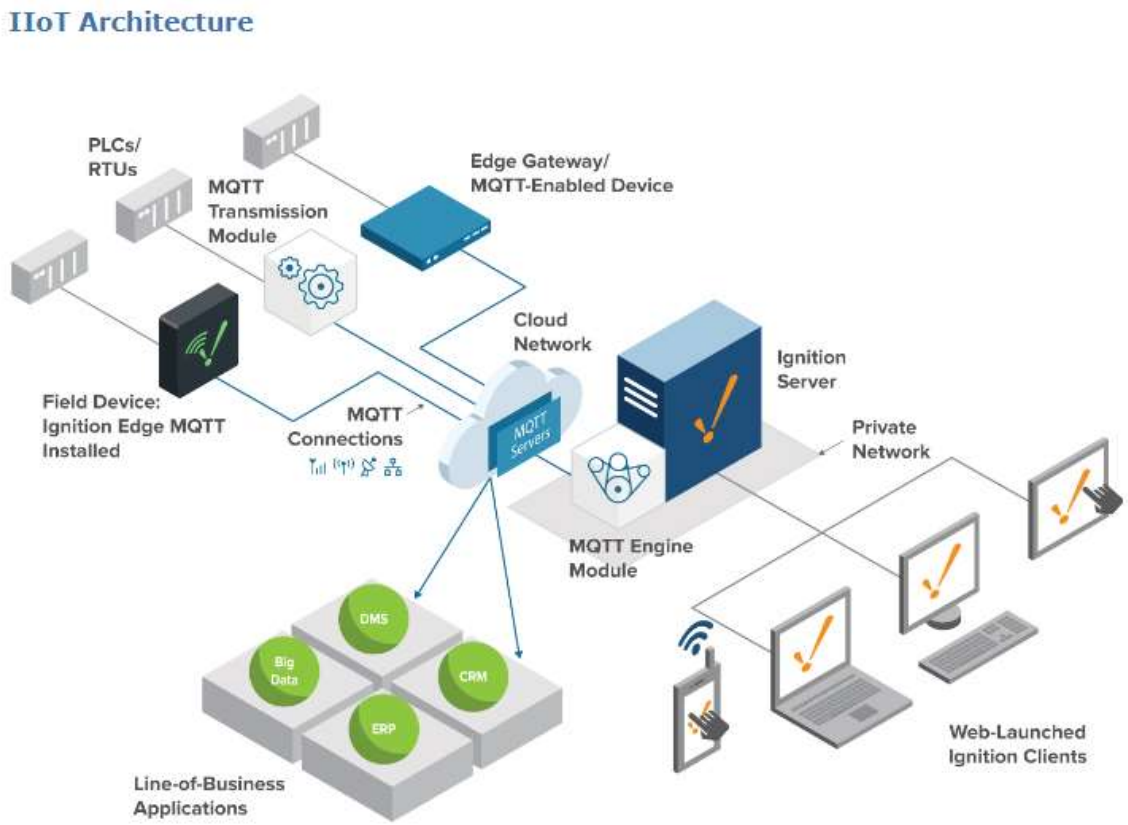
U.S. Patent No. 9,898,014	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 18	
[18] system of claim 12, comprising: means for ensuring at least some data is not lost if network access ceases intermittently.	The Accused System includes a means for ensuring at least some data is not lost if network access ceases intermittently. *See, e.g.*: *See* claim 12 above.

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 4. For example, the PLCs in the schematic above buffer data in case of a network outage, which is then synchronized to the Ignition Gateway once connectivity is restored. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

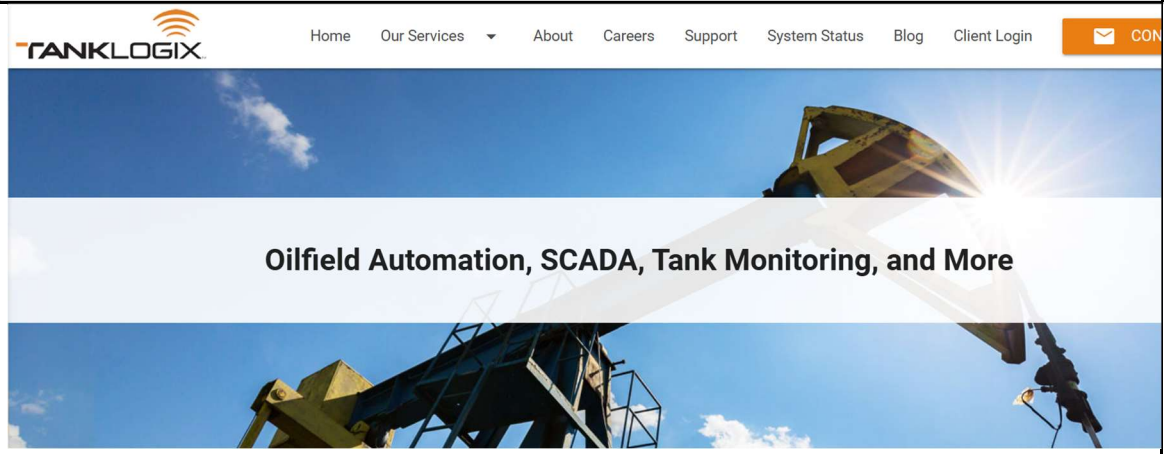
U.S. Patent No. 9,898,014	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 19	
[19] The system of claim 12, comprising: means for translating a command for an actuator from an input format to a format configured to effectuate changes in the actuator.	The Accused System includes a means for translating a command for an actuator from an input format to a format configured to effectuate changes in the actuator. *See, e.g.*: *See* claim 12 above. The Accused System includes, for example, a variable-frequency drive (VFD). For example, the facility includes a fluid-handling device (e.g., pump with an actuator) and a motor powered by a VFD: 

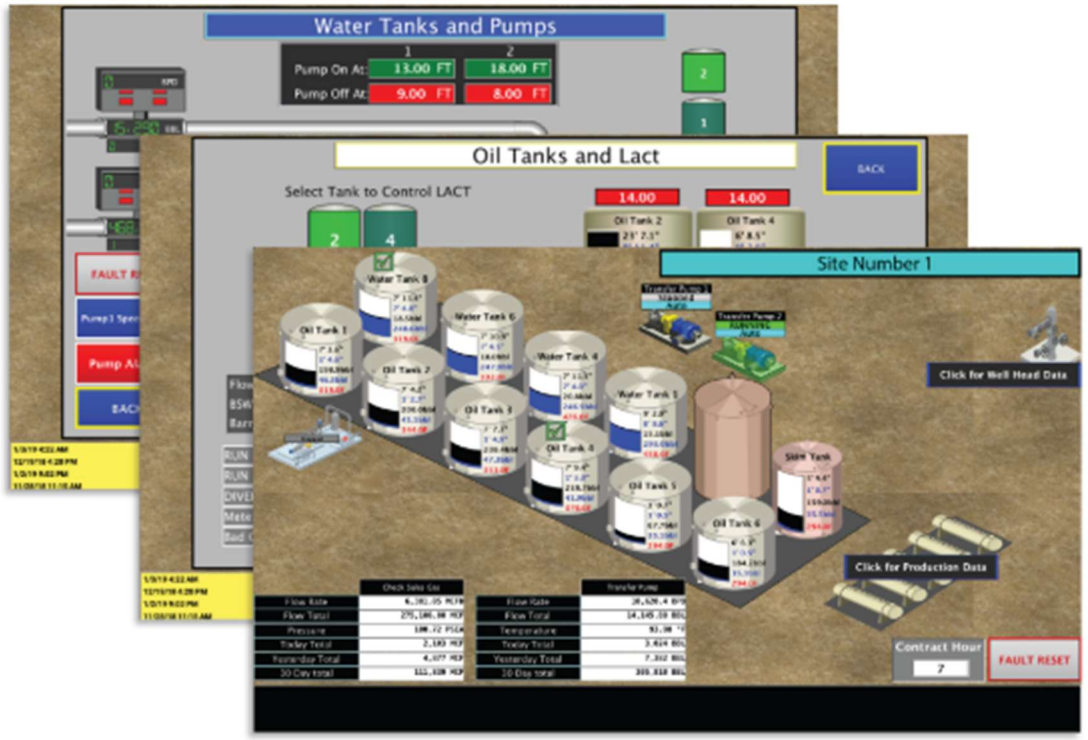
U.S. Patent No. 9,898,014	The TankLogix System
	Exhibit 6. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices.As shown in the example below, the Accused System further comprises sending the translated commands to respective local controllers of the respective fluid -handling devices to which the respective commands are directed. 

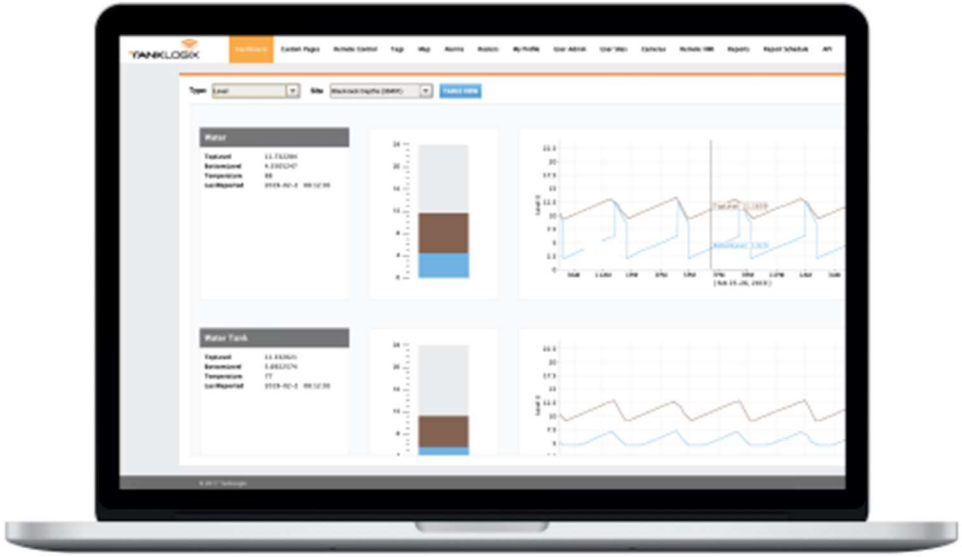
U.S. Patent No. 9,898,014	The TankLogix System
	Exhibit 4. For example, on information and belief, the PLCs receive commands in a protocol such as TCP/IP, received via, for example, a TCP/IP connection, and the send the commands to the fluid-handling devices to which the respective commands are directed via the appropriate protocol. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 20	
[20] The system of claim 19, comprising: means for executing control routines implicated by translated commands on an individual actuator or sensor.	The Accused System includes means for executing control routines implicated by translated commands on an individual actuator or sensor. *See, e.g.*: *See* claim 19 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 21	
[21] The system of claim 12, comprising: means for transmitting	The Accused System includes a means for transmitting data to the facility-interface module or modules. *See, e.g.*:

U.S. Patent No. 9,898,014	The TankLogix System
data to the facility-interface module or modules.	*See* claim 12 above.  Exhibit 4. As shown in the schematic above, the PLCs in the Accused System transmit data to the facility-interface module (e.g., Ignition Server), for example, via TCP/IP communication. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a

U.S. Patent No. 9,898,014	The TankLogix System
	manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 22	
[22] The system of claim 12, comprising: means for checking validity of a command.	The Accused System includes means for checking validity of a command. *See, e.g.*: *See* claim 12 above. For example, on information and belief, the client interface, Ignition Server, and/or PLCs in the Accused System include control logic to check whether a manual control value falls within boundary thresholds. Furthermore, fluid-handling devices equipped with VFDs may similarly check incoming commands against preset boundary values. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 23	
[23] The system of claim 12, comprising: an oil or gas facility communicatively coupled to the controller.	The Accused System includes an oil or gas facility communicatively coupled to the controller. *See, e.g.*: *See* claim 12 above.

U.S. Patent No. 9,898,014	The TankLogix System
	 Exhibit 7.

U.S. Patent No. 9,898,014	The TankLogix System
	

U.S. Patent No. 9,898,014	The TankLogix System
	

U.S. Patent No. 9,898,014	The TankLogix System
	TANKLOGIX **Produced Wastewater** This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate truck dispatching to ensure that the producer doesn't have to slow down production. TankLogix recognizes that trucking this water is expensive, which is why minimizing trucking expenses can greatly increase the bottom line. The Tank Warden System enhances transparency and accountability for both operators and transporters. The Tank Warden System can be configured to restrict access to the valve if the driver of the truck is not verified; it can also report instantly the amount of water/product that has been taken. This system has successfully enhanced tank security, while reducing theft and human error. TankLogix has implemented the Tank Warden System at water disposal sites as well. These customers especially enjoy the automatic tank gauging system because they don't have to employ someone to permanently watch the tanks. TankLogix has also provided other automated tank monitoring and field monitoring services to water disposal companies. Some of the other devices TankLogix can monitor at the wellhead are: - Flow Meters - Pumps - H_2S and other gasses - Premium Sensors Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

Exhibit C

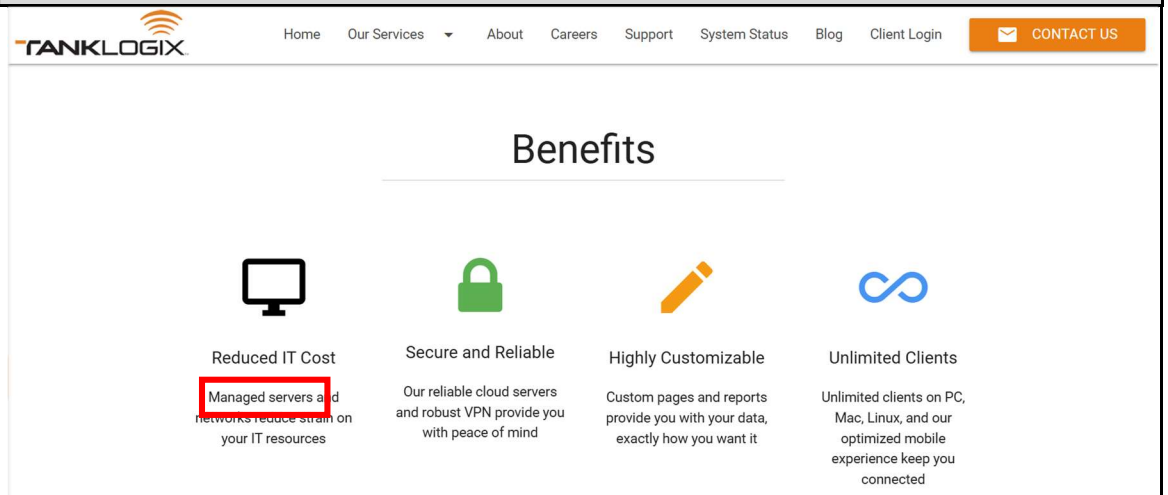
Infringement Analysis of U.S. Patent No. 11,175,680 Against the TankLogix Ignition-Hosted Automation System Implemented by TankLogix LLC ("TankLogix")

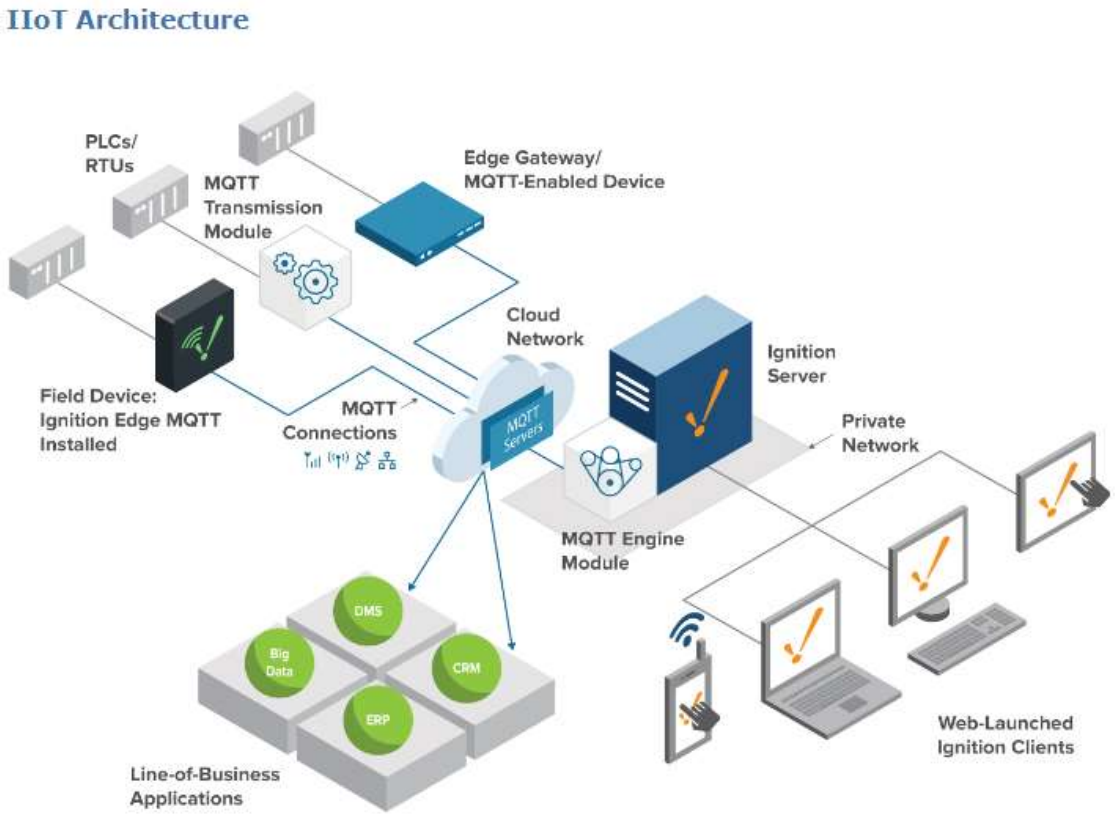
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System(s) each element of claims 1-20 of U.S. Patent No. 11,175,680 (the "'680 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed and implemented by TankLogix, LLC.

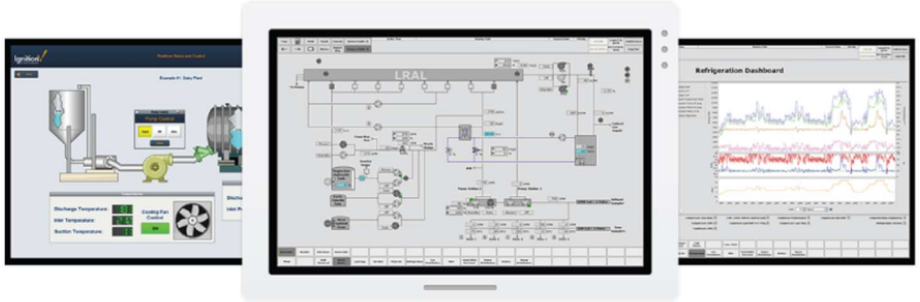
References Cited:

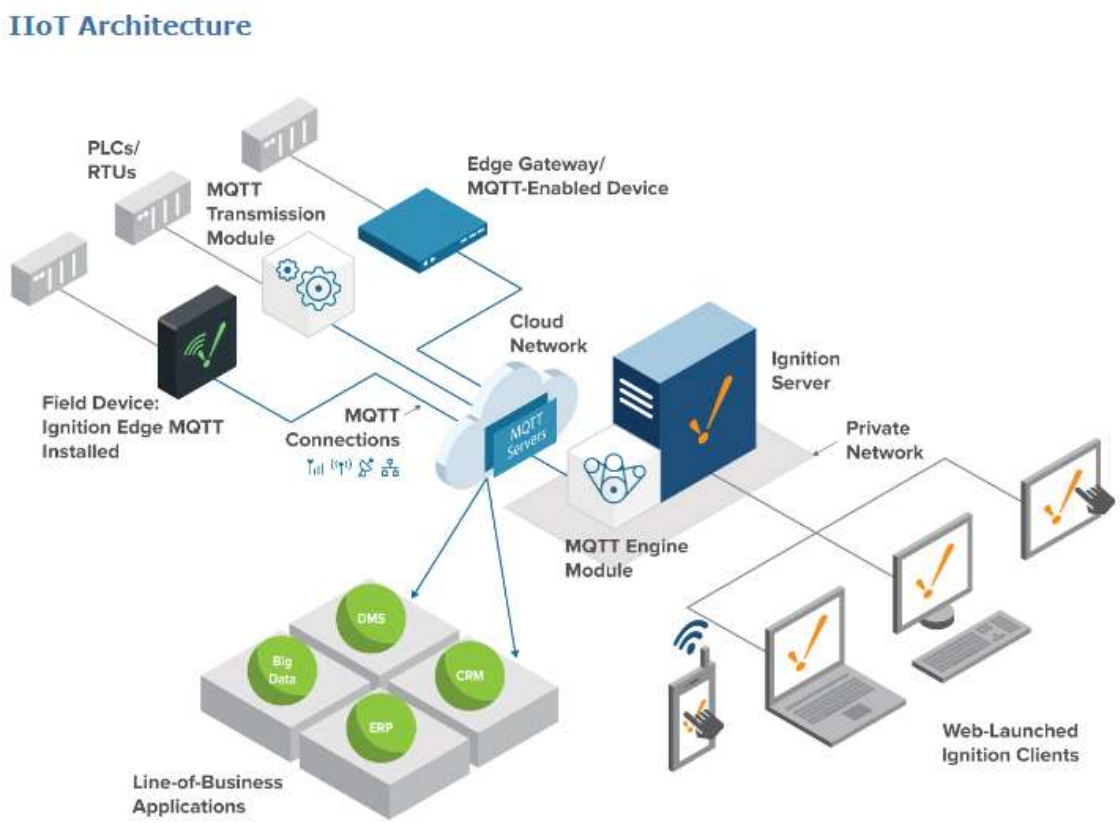
- Exhibit 1, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 2, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 3, https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition.
- Exhibit 4, https://www.tanklogix.com/vfd-controls-and-motors/.
- Exhibit 5, https://tanklogix.com/tank-monitoring.
- Exhibit 6, https://www.tanklogix.com/.

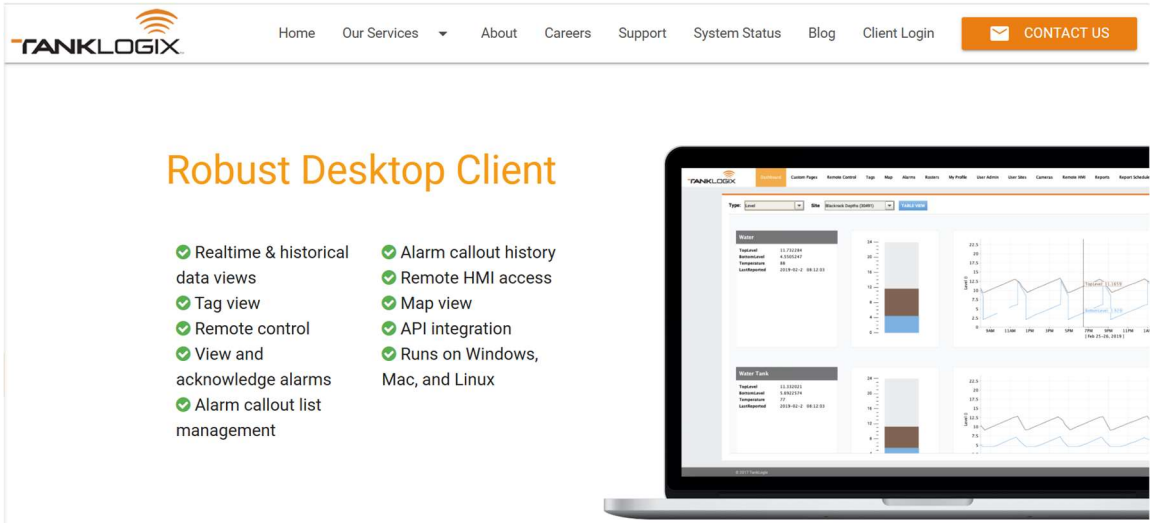
U.S. Patent No. 11,175,680	The TankLogix System
Claim 1	
[1.1] A non-transitory, machine-readable medium comprising instructions to effectuate operations, the operations comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a non-transitory, machine-readable medium comprising instructions to effectuate operations. *See, e.g.*: Comprehensive Hosted SCADA TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered by Inductive Automation's Ignition platform. Easily connect v collect data from, and control your field devices over our secure network. Your data is safely hosted on our cloud-based infrastructure, providing t reliability and integrity. Intuitive design and robust features in our desktop and mobile software provide powerful insights and monitoring of your and operations. Reduce IT resource strain by having us handle the software development, network, IT infrastructure, and maintenance so you car on production and profitability. Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents.
[1.2] receiving, with a server, a command comprising a target value of a fluid-handling device from a computing device via a control interface, wherein the command is received in association with a record stored on a datastore;	The Accused System receives, with a server, a command comprising a target value of a fluid-handling device from a computing device via a control interface, wherein the command is received in association with a record stored on a datastore. *See, e.g.*:

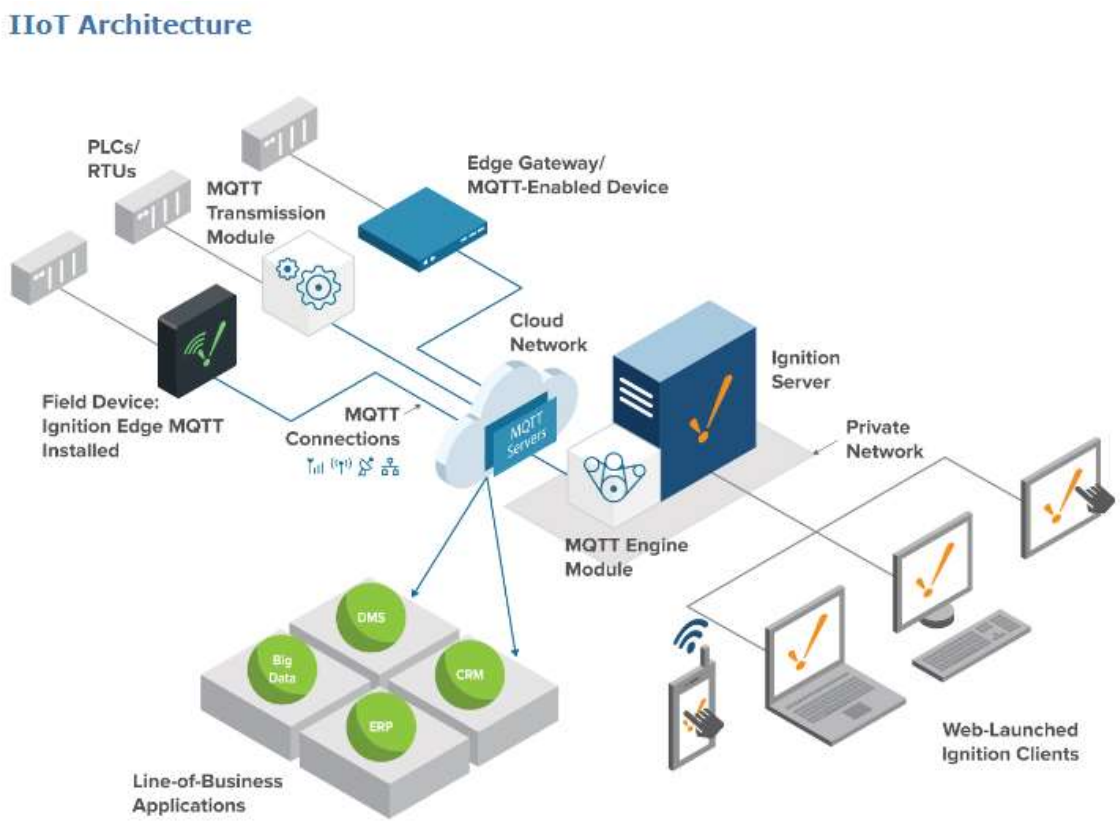
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1 (annotated). The Accused System includes servers that host the Ignition platform. As shown in the example below, the Ignition platform includes an Ignition Server that receives commands from Web-Launched Ignition Clients (computing devices).

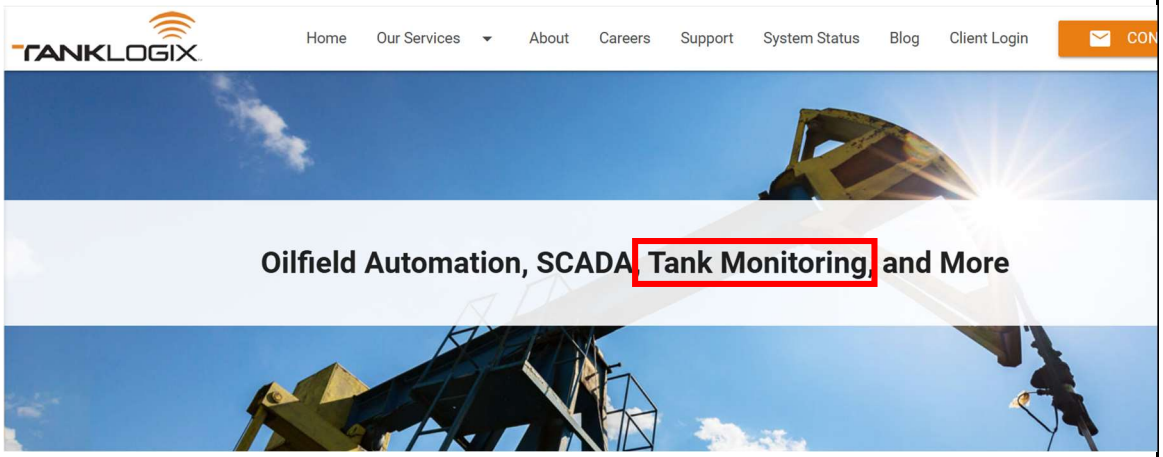
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2. As shown in the example below, the Web-Launched Ignition Clients comprise HMIs (control interfaces) that allow users to input commands that are received by the server:

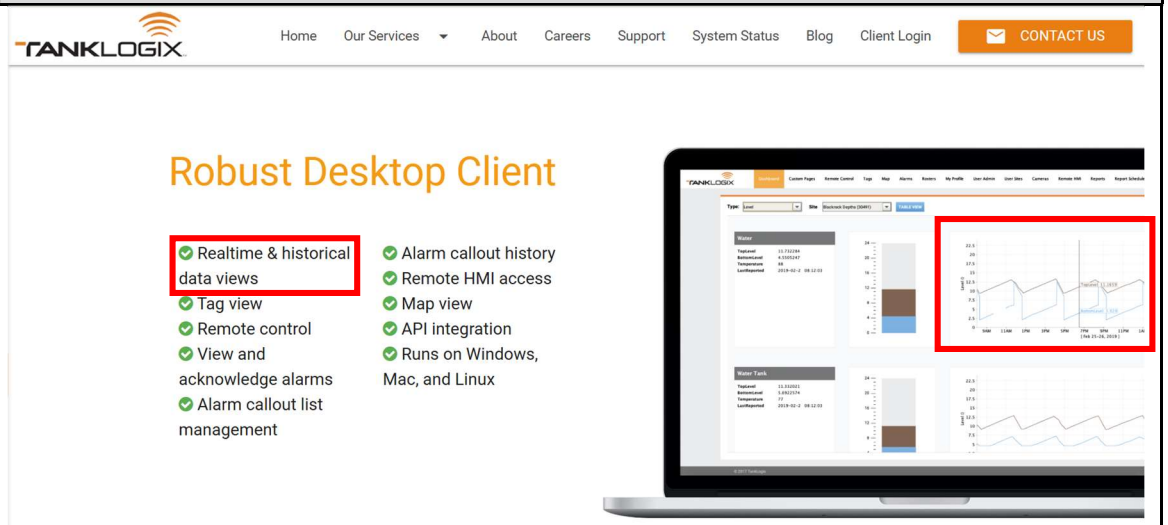
U.S. Patent No. 11,175,680	The TankLogix System
	Web-based HMI and SCADA applications deployment # Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way. Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See and manage your entire system from one place.  Exhibit 3. These commands are received in association with a record (for example, a tag) stored on a datastore. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

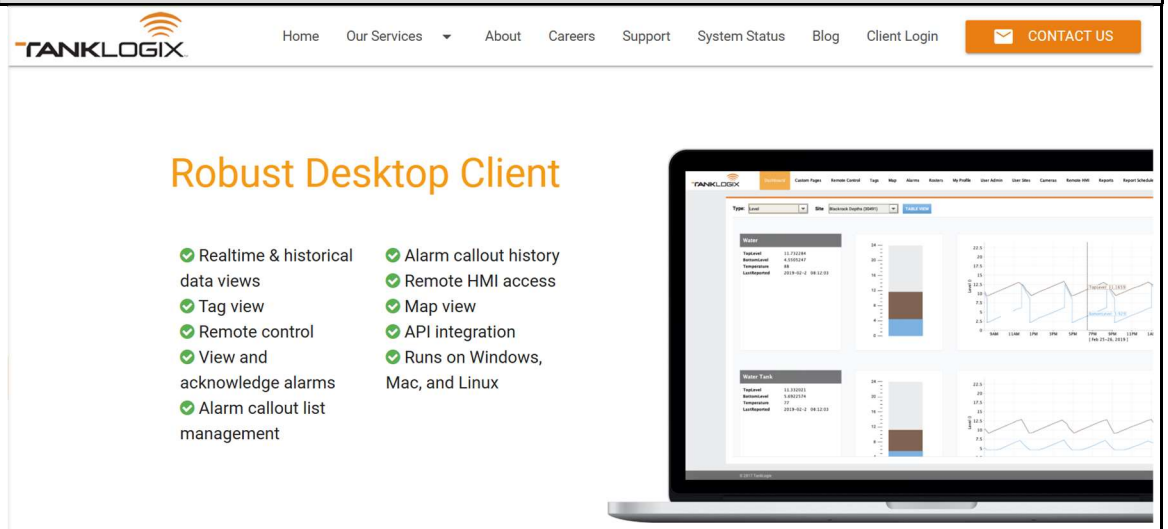
U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.3] determining, with the server, a network address of a network based on the record, wherein the network address identifies a controller of the fluid-handling device, and wherein the controller accesses a sensor to measure a fluid being handled by the fluid-handling device and an actuator of the fluid-handling device;	The Accused System includes a server that determines a network address of a network based on the record, wherein the network address identifies a controller of the fluid-handling device, and wherein the controller accesses a sensor to measure a fluid being handled by the fluid-handling device and an actuator of the fluid-handling device. *See, e.g.*: 

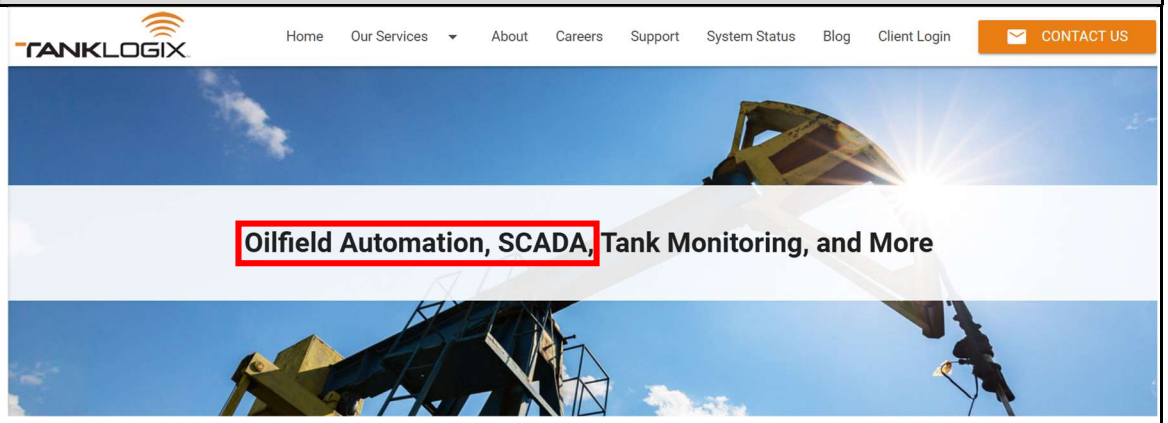
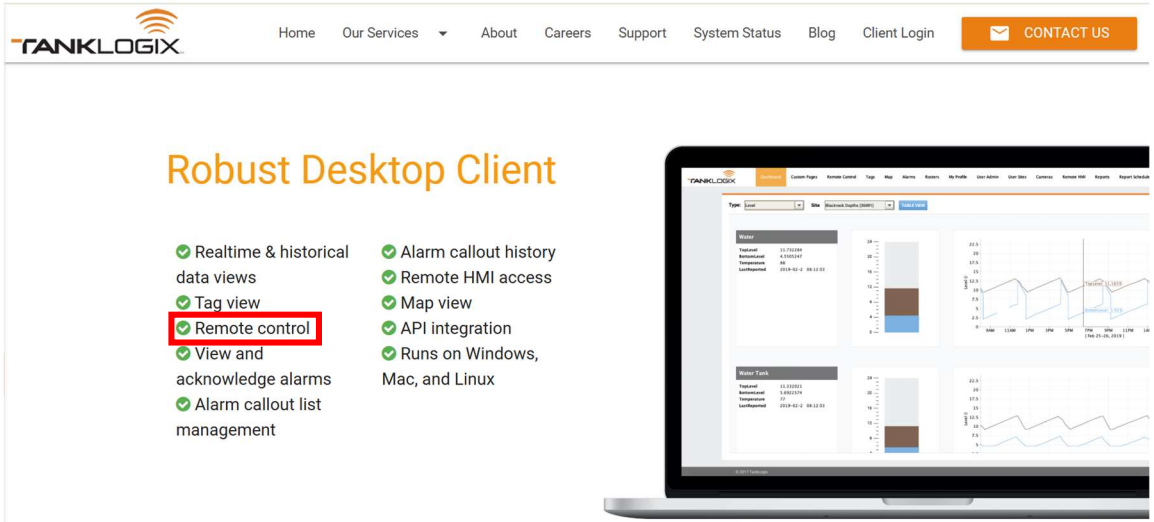
U.S. Patent No. 11,175,680	The TankLogix System
	Exhibit 2. The server (for example, the Ignition Server) necessarily identifies a network address of a controller of a fluid-handling device (for example, a PLC). As shown in the example below, the controller (e.g., PLC) accesses a sensor to measure a fluid being handled by the fluid-handling device (e.g., Realtime & historical data views) and an actuator of the fluid-handling device (e.g., Remote control):  Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

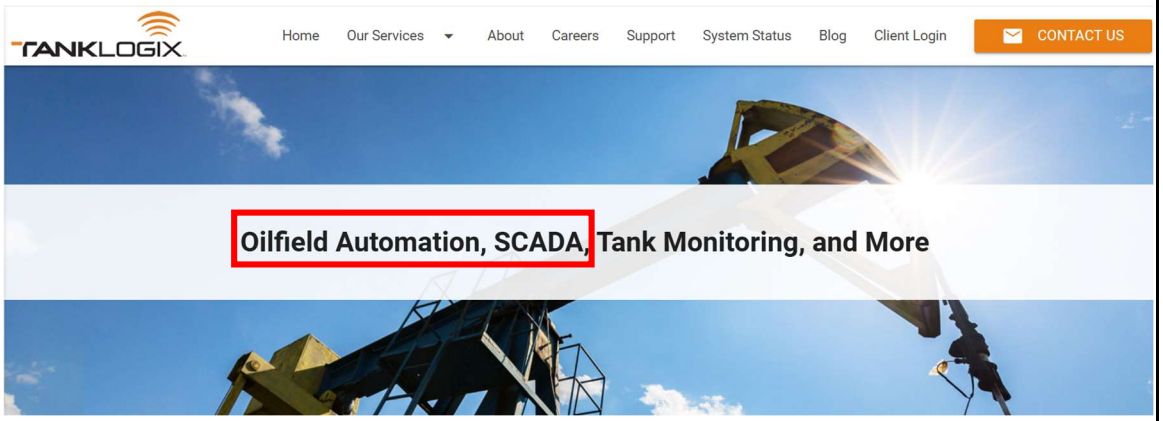
U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.4] sending, with the server, the target value to the network address via the network;	The Accused System sends, with the server, the target value to the network address via the network. *See, e.g.*:  Exhibit 2.

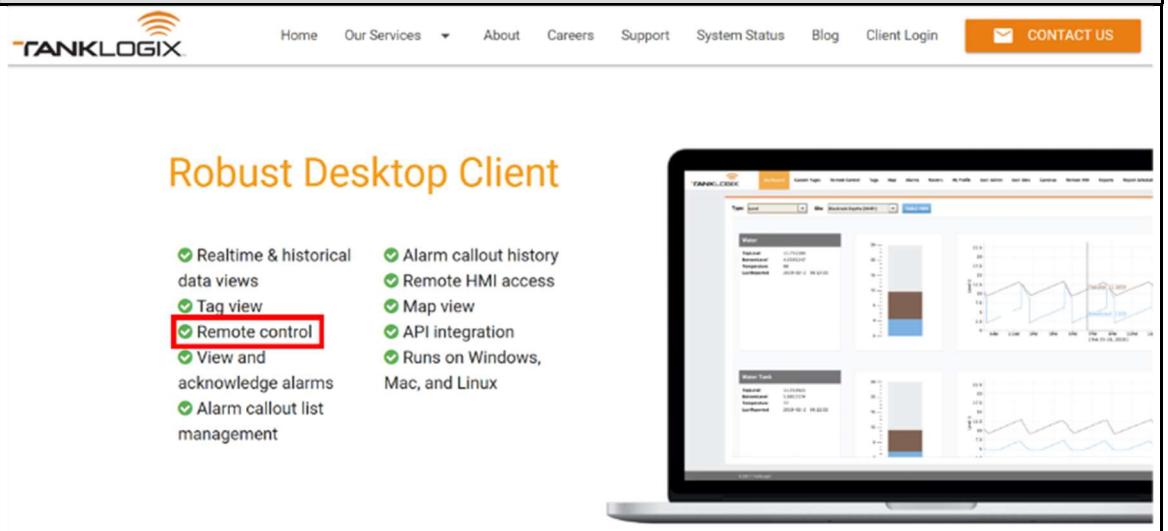
U.S. Patent No. 11,175,680	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.5] receiving, with the controller, a measurement of the fluid by the sensor;	The Accused System performs receiving, with the controller, a measurement of the fluid by the sensor. *See, e.g.*:  Exhibit 6.

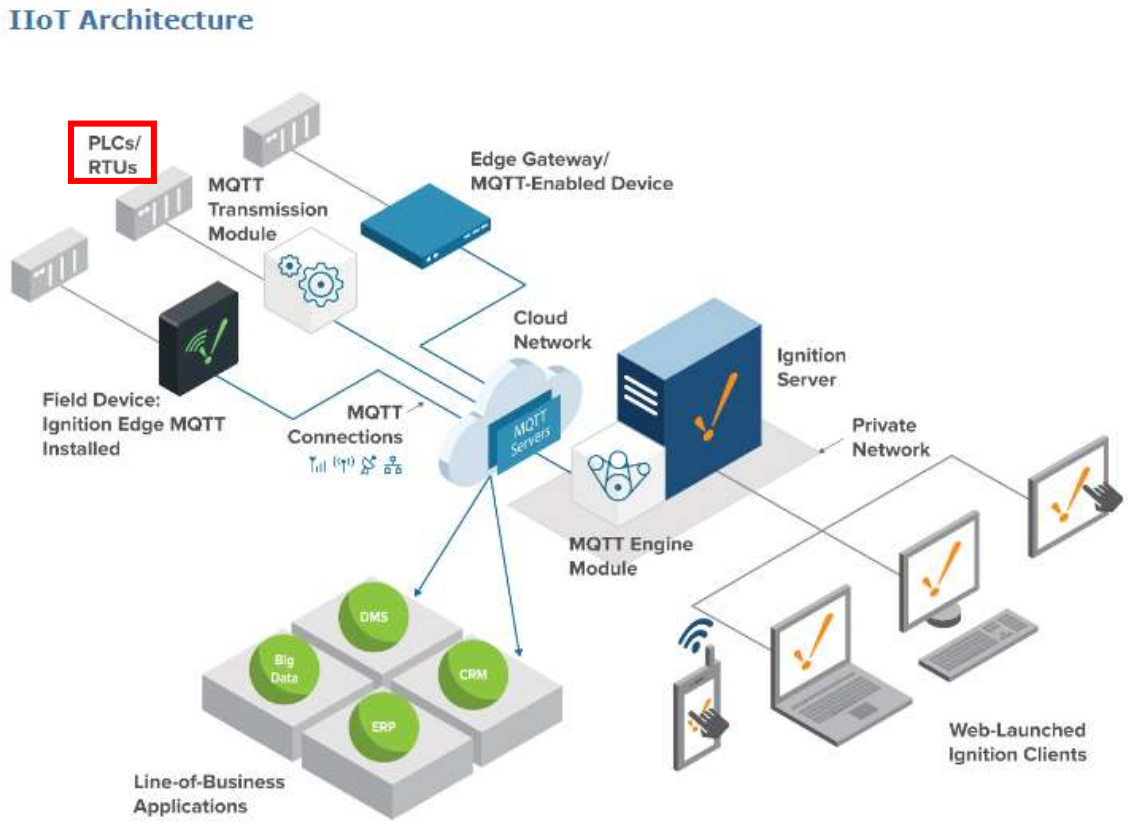
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.6] determining, with the controller, whether the measurement satisfies the target value;	The Accused System performs determining, with the controller, whether the measurement satisfies the target value. *See, e.g.*:

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.7] in response to a determination that the measurement does not satisfy the target value, obtaining, with the controller, a set point based on the command; and	The Accused System performs, in response to a determination that the measurement does not satisfy the target value, obtaining, with the controller, a set point based on the command. *See, e.g.*:

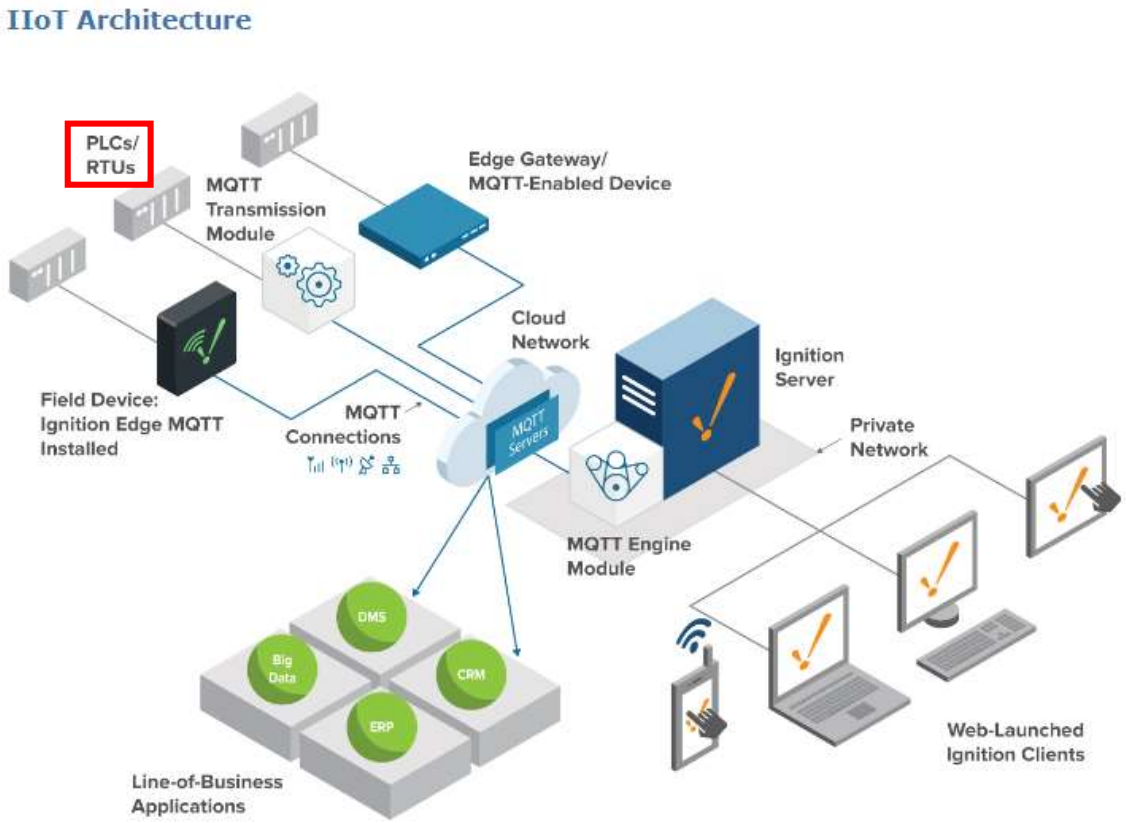
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 6.  Exhibit 1 (annotated).

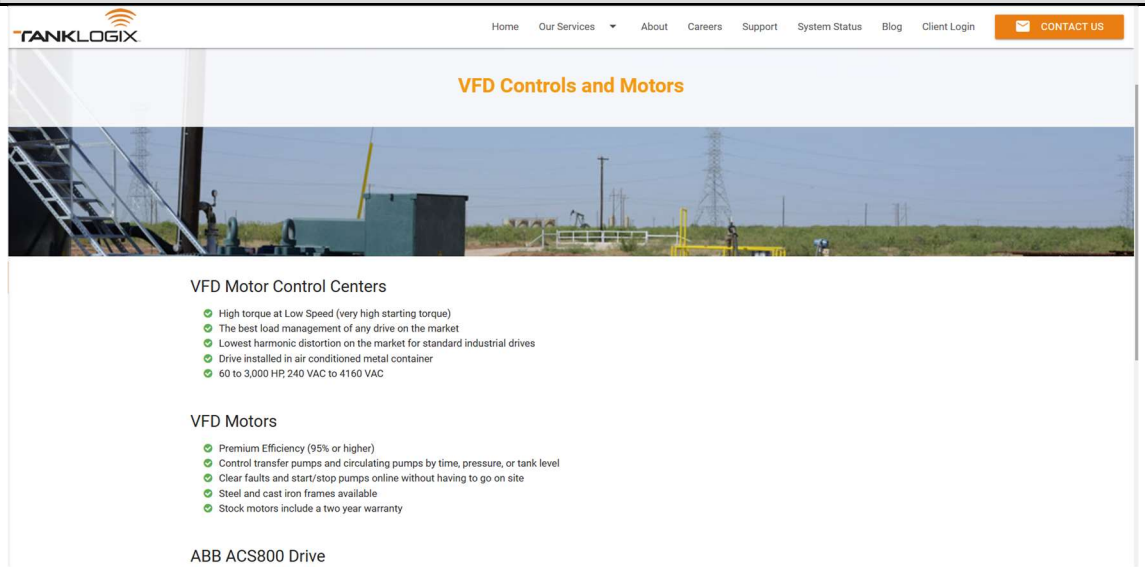
U.S. Patent No. 11,175,680	The TankLogix System
	PID feedback control entails such a determination and obtaining a new set point to reduce a difference between the target and sensed value (measurement). *See, e.g.*, claim element 1.6 above.
[1.8] controlling, with the controller, the actuator based on the set point.	The Accused System performs controlling, with the controller, the actuator based on the set point. *See, e.g.*:  Exhibit 6.

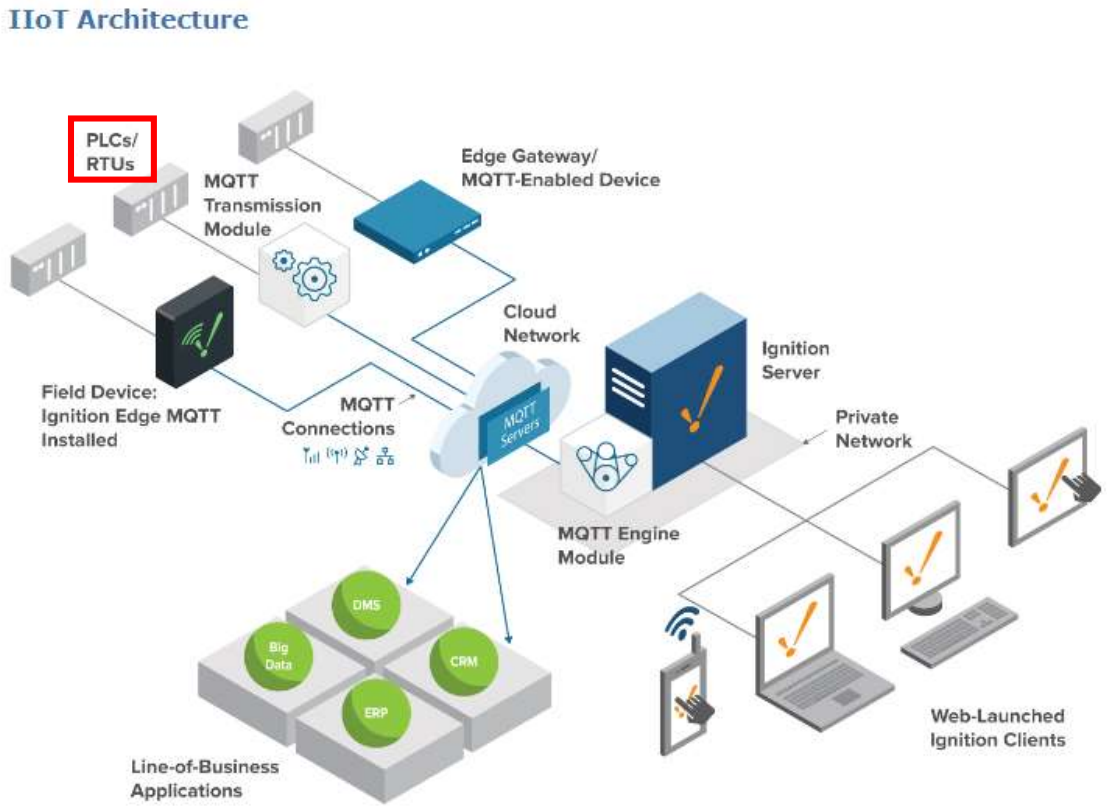
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1 (annotated). PID feedback control entails controlling the actuator to reduce the difference between the target and sensed value (measurement). *See, e.g.*, claim element 1.6 above.
Claim 2	
[2.1] The medium of claim 1, wherein: the controller is a site master-controller;	The controller in the Accused System is a site master-controller. *See, e.g.*: *See* claim 1 above.

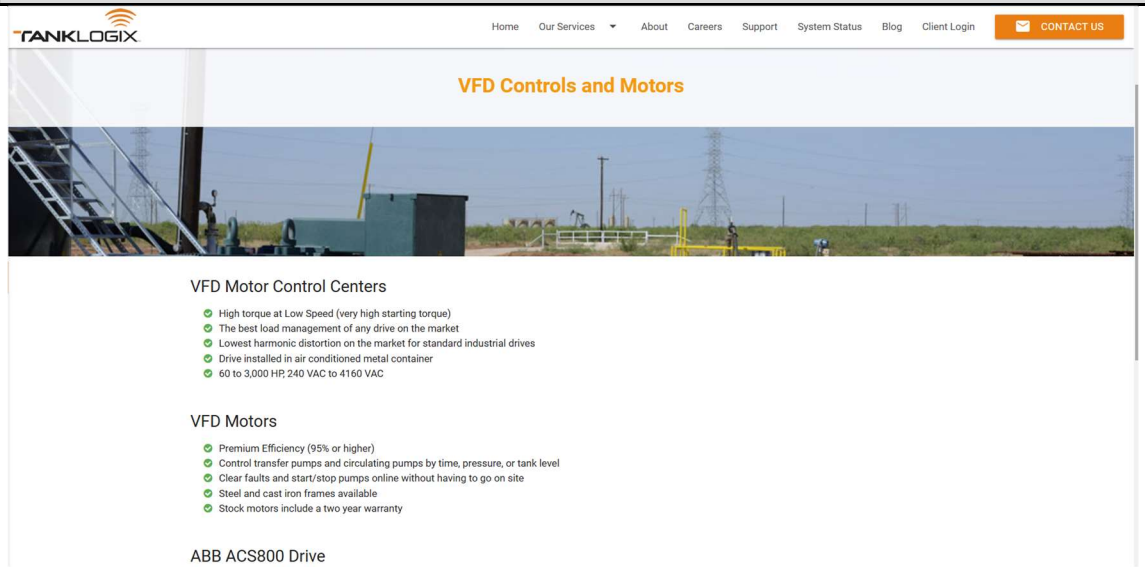
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the

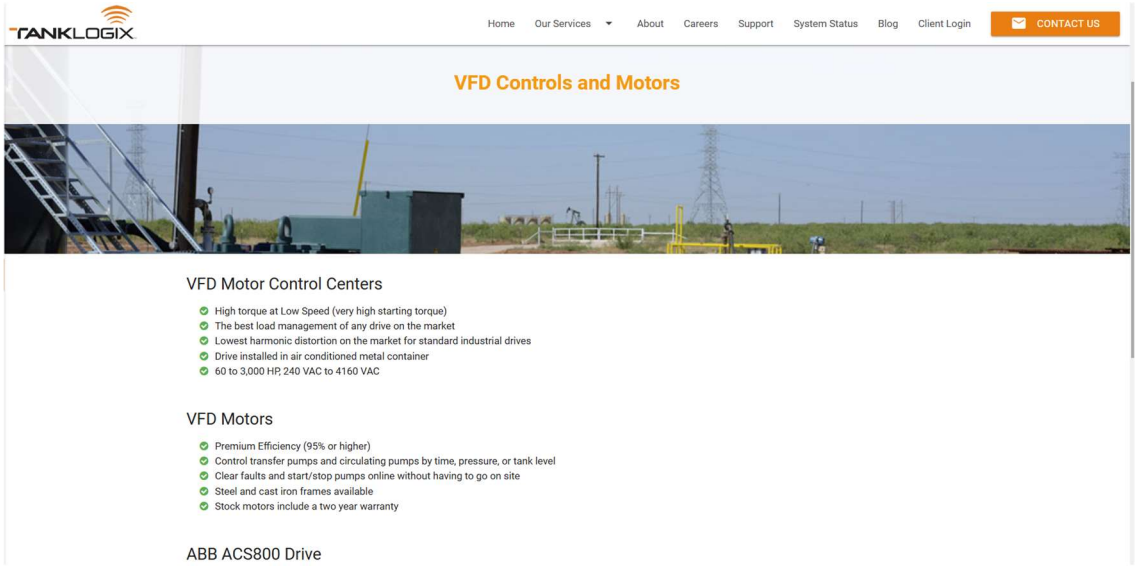
U.S. Patent No. 11,175,680	The TankLogix System
	insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[2.2] the site master-controller controls a plurality of local controllers, the plurality of local controllers comprising a first local controller in communication with the actuator;	In the Accused System, the site master-controller controls a plurality of local controllers, the plurality of local controllers comprising a first local controller in communication with the actuator. *See, e.g.*:

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2 (annotated). On information and belief, the plurality of local controllers includes a first local controller (e.g., a VFD) in communication with the actuator of the pump driven by the VFDs.

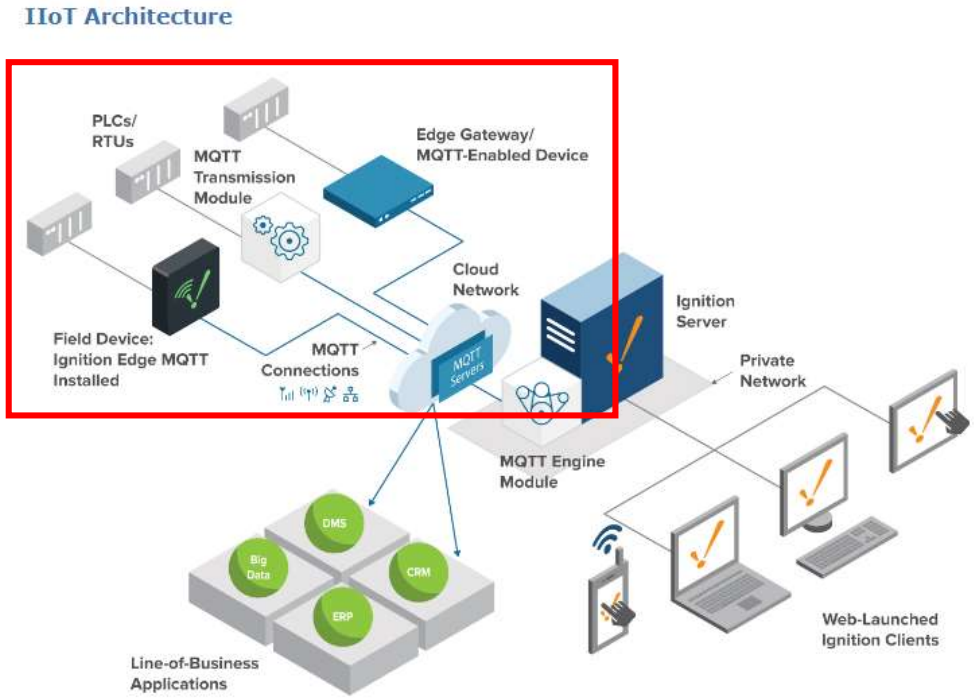
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[2.3] controlling the actuator with the controller based on the set point comprises: sending the set point from the site master-controller to the first local controller; and	In the Accused System, controlling the actuator with the controller based on the set point comprises: sending the set point from the site master-controller to the first local controller. On information and belief, the site-master controller (e.g., the PLC) sends the set point to the first local controller (e.g., the VFD). *See, e.g.*:

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2 (annotated).

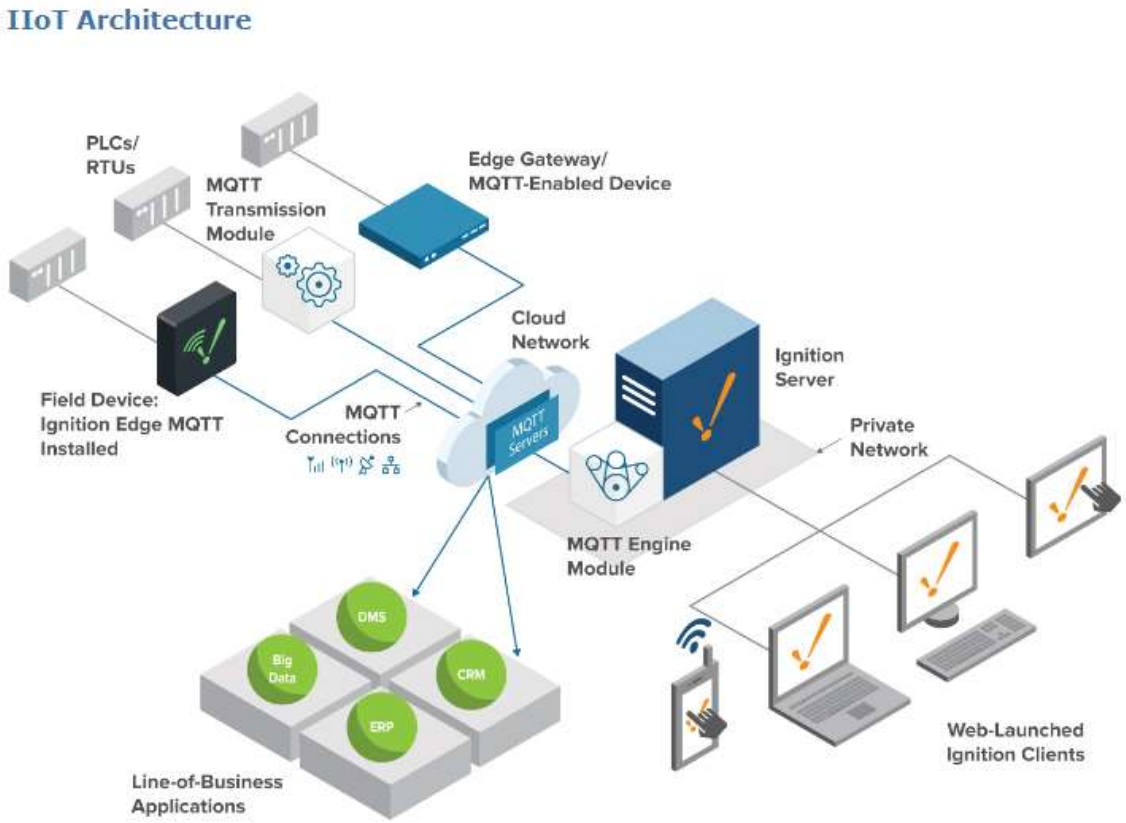
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[2.4] actuating, with the first local controller, the actuator based on the set point.	The Accused System comprises actuating, with the first local controller, the actuator based on the set point. *See, e.g.*: *See, e.g.*, claim 1 and claim elements 2.1-2.3 above.
Claim 3	

U.S. Patent No. 11,175,680	The TankLogix System
[3.1] The medium of claim 1, wherein: obtaining the set point comprises determining a sequence of set points based on the command; and	In the Accused System, obtaining the set point comprises determining a sequence of set points based on the command. *See, e.g.*: *See* claim 1 above. The command is effectuated by changing the state of the pump driven by a VFD to a sequence of different set points that change over time. The VFD undergoes, for example, a "soft start" to ramp up the speed of the pump, during which the target state of the pump gradually changes over time from an initial state to the final state. *See, e.g.*:  Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

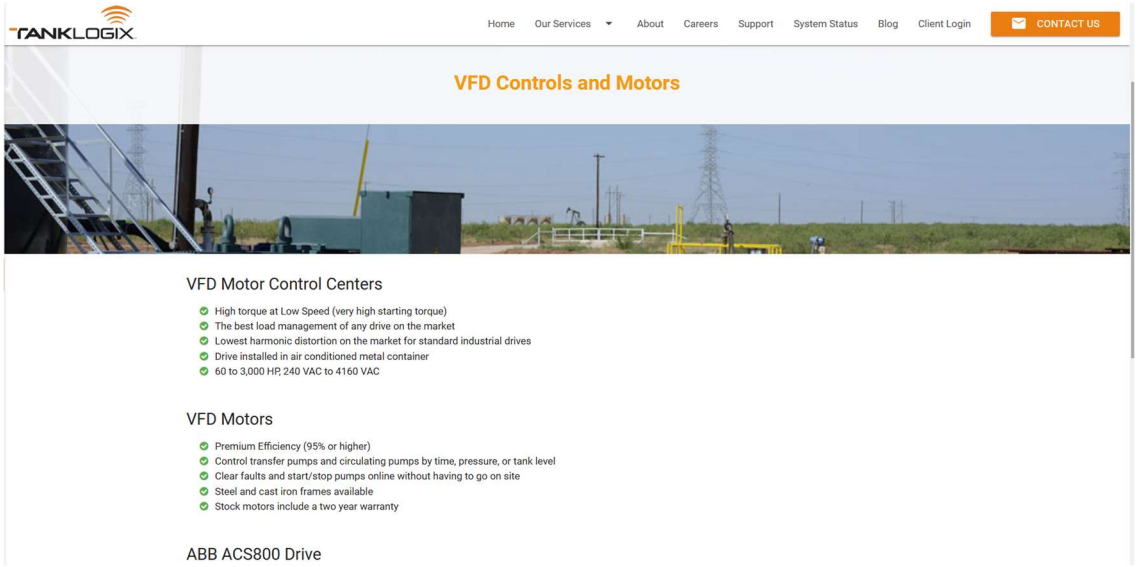
U.S. Patent No. 11,175,680	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[3.2] controlling the actuator comprises controlling the actuator to a plurality of different states based on the sequence of set points.	In the Accused System, controlling the actuator comprises controlling the actuator to a plurality of different states based on the sequence of set points. *See, e.g.*: *See, e.g.*, claim element 3.1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 4	
[4.1] The medium of claim 1, wherein the command is a first command, and wherein sending the command to the network address comprises: identifying a protocol of the fluid-handling device based on the network address;	In the Accused System, the command is a first command, and sending the command to the network address comprises: identifying a protocol of the fluid-handling device based on the network address. *See, e.g.*: *See* claim 1 above. The Accused System is configured to send the command to the network address of the controller (*see, e.g.*, claim element 1.4) by identifying a protocol of the fluid-handling device. The commands, e.g., in Ethernet and modbus, each entails a respective format and protocol that is identified.

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

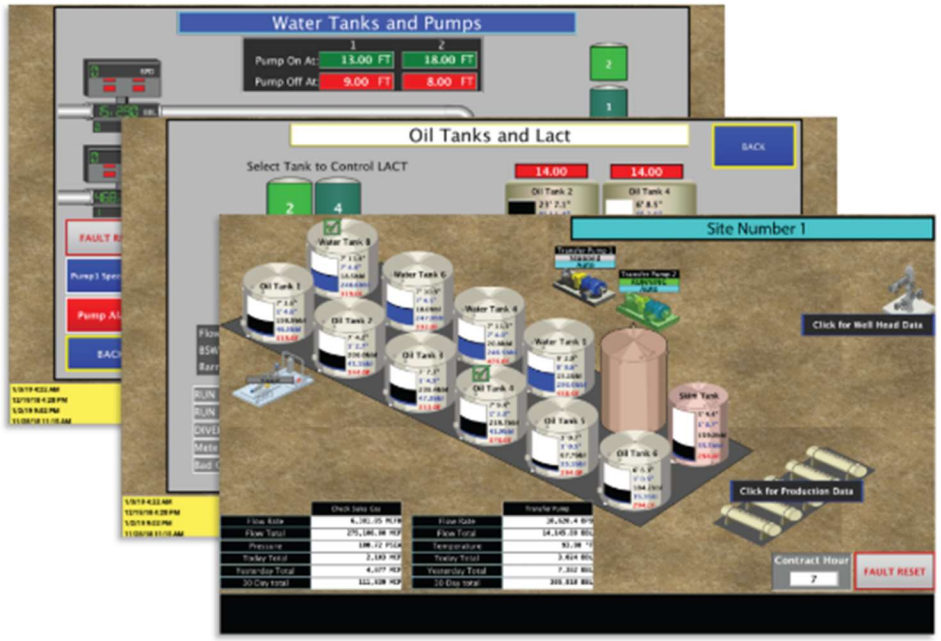
U.S. Patent No. 11,175,680	The TankLogix System
[4.2] translating the first command into a translated command based on the protocol; and	The Accused System performs translating the first command into a translated command based on the protocol. *See, e.g.*: *See* claim 1 above. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[4.3] sending the translated command to the controller.	The Accused System sends the translated command to the controller. *See, e.g.*:

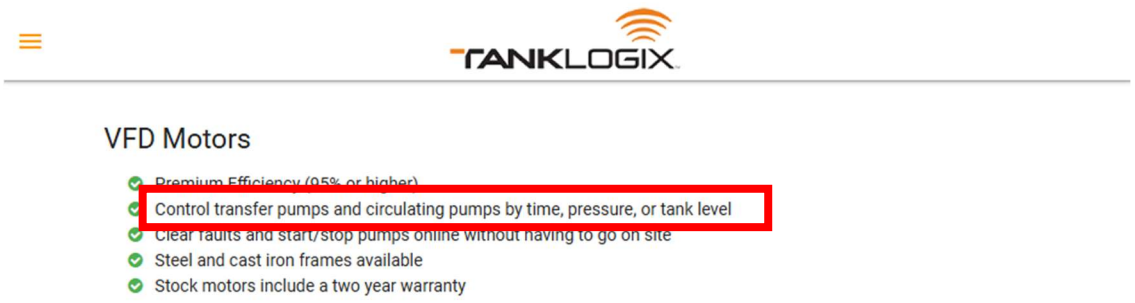
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2. For example, on information and belief, the PLCs send the commands to the fluid-handling devices to which the respective commands are directed via the appropriate protocol. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

U.S. Patent No. 11,175,680	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 5	
[5] The medium of claim 4, wherein identifying the protocol comprises parsing an identifier from the first command and retrieving a corresponding record from a set of records based on the identifier, the corresponding record including a protocol identifier of the protocol.	In the Accused System, identifying the protocol comprises parsing an identifier from the first command and retrieving a corresponding record from a set of records based on the identifier, the corresponding record including a protocol identifier of the protocol. *See, e.g.*: *See* claim 4 above. The identifier parsed from the first command is, e.g., an identifier of a pump driven by VFDs. On information and belief, the Accused System retrieves a corresponding record from a set of records ("datastore") based on the identifier, the corresponding record includes a protocol identifier of the protocol. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 6	
[6.1] The medium of claim 1, wherein: the set point is a first set point;	In the Accused System, the set point is a first set point. *See, e.g.*: *See* claim 1 above. *See, e.g.*, claim element 1.7 above.

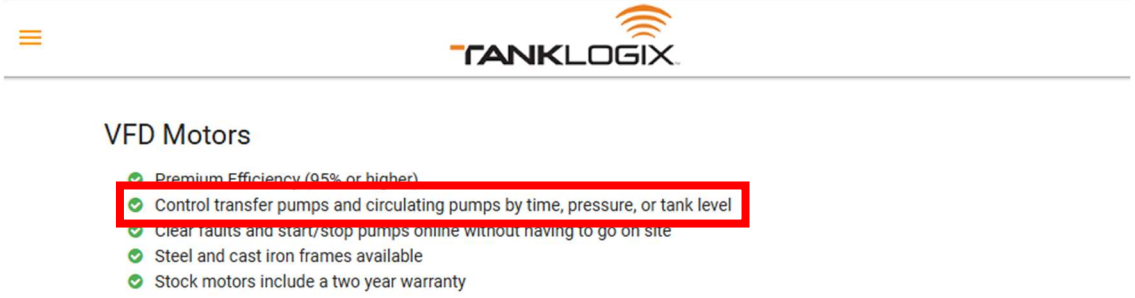
U.S. Patent No. 11,175,680	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[6.2] the command comprises the first set point and a second set point;	In the Accused System, the command comprises the first set point and a second set point. *See, e.g.*: The command is effectuated by changing the state of the pump driven by the VFD to a sequence of different target states that change over time. The VFD undergoes a "soft start" to ramp up the speed of the pump, during which the target state of the pump gradually changes over time form an initial state to the final state. *See, e.g.*: 

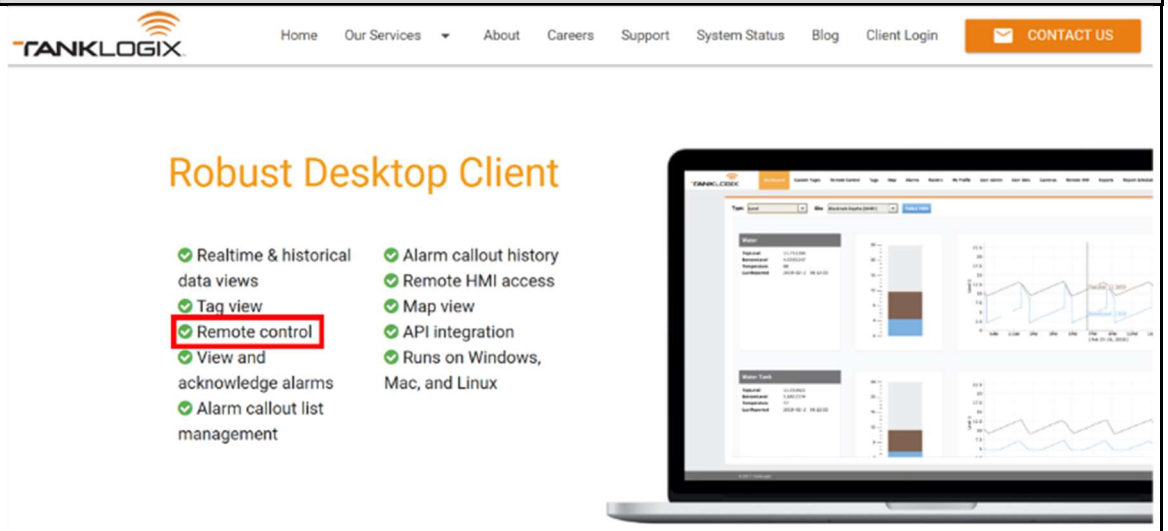
U.S. Patent No. 11,175,680	The TankLogix System
	Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[6.3] obtaining the first set point comprises obtaining the first set point and the second set point from the command;	In the Accused System, obtaining the first set point comprises obtaining the first set point and the second set point from the command. *See, e.g.*: *See, e.g.*, claim element 6.2 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[6.4] the measurement is a first measurement;	In the Accused System, the measurement is a first measurement. *See, e.g.*: For example, a screenshot of an interface of the Accused System shows a first measurement. *See, e.g.*:

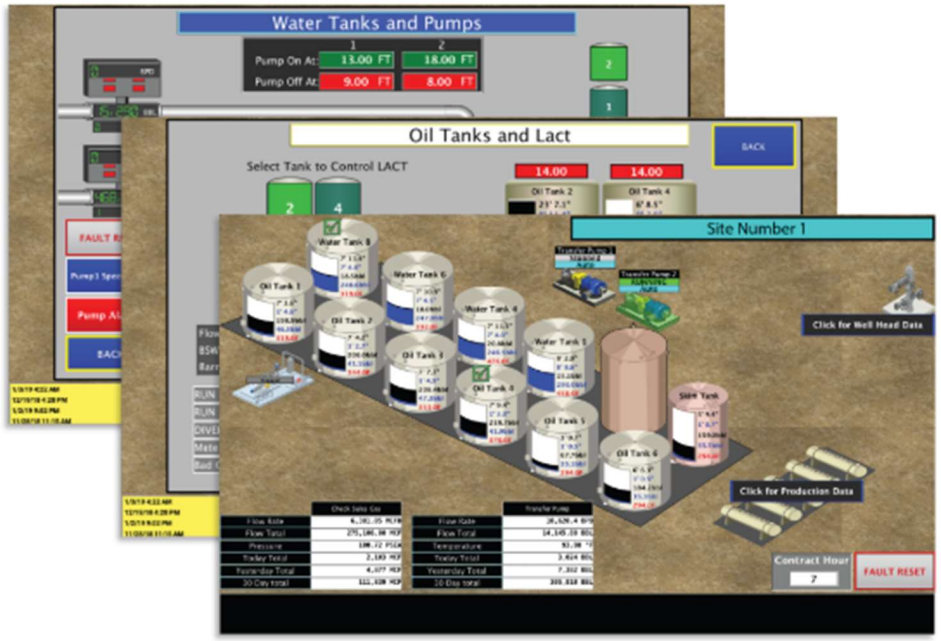
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

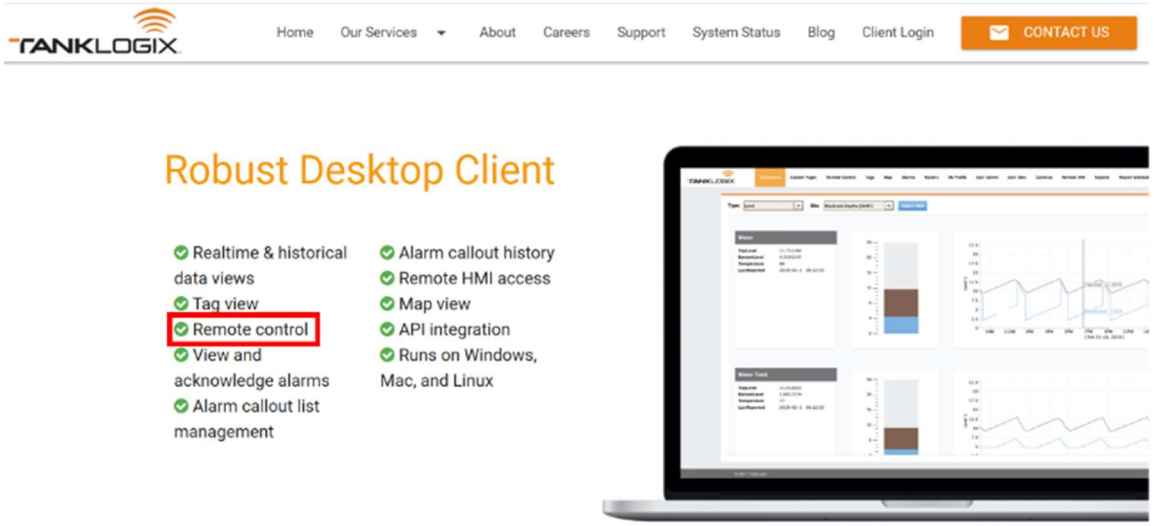
U.S. Patent No. 11,175,680	The TankLogix System
[6.5] the operations further comprises: receiving, with the controller, a second sensor measurement after controlling the actuator based on the first set point;	The Accused System performs receiving, with the controller, a second sensor measurement after controlling the actuator based on the first set point. *See, e.g.*: On information and belief, the controller (e.g., PLC) receives a second sensor measurement from a sensor connected to the pump driven by the VFDs after controlling the actuator based on the first set point. *See, e.g.*:  Exhibit 4 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[6.6] determining, with the controller, whether the second sensor measurement satisfies a criterion based on the first set point; and	The Accused System performs determining, with the controller, whether the second sensor measurement satisfies a criterion based on the first set point. *See, e.g.*: *See, e.g.*, claim elements 1.6 and 1.7 above.

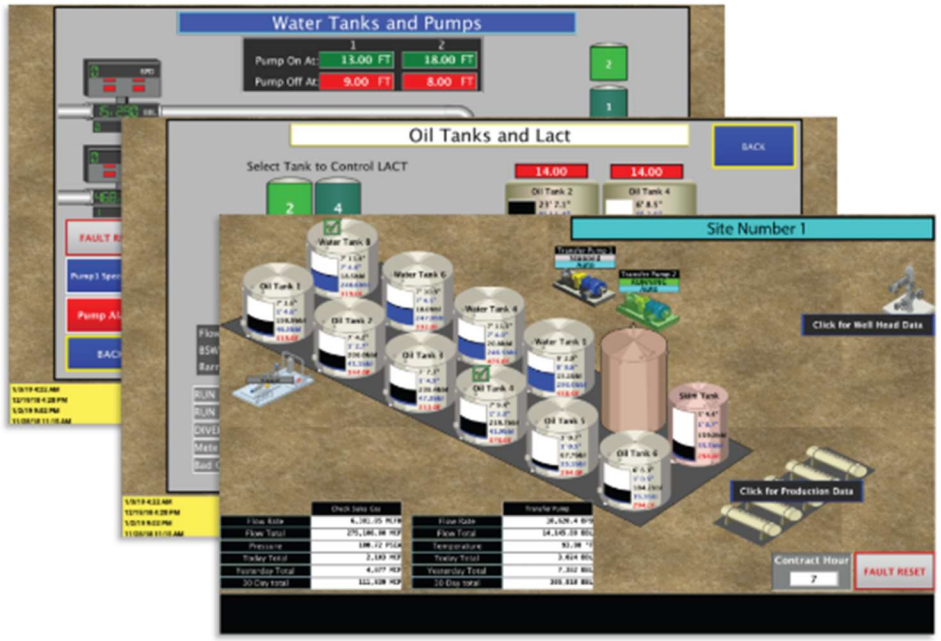
U.S. Patent No. 11,175,680	The TankLogix System
[6.7] in response to a determination that the first set point is satisfied, controlling the actuator based on the second set point.	The Accused System performs in response to a determination that the first set point is satisfied, controlling the actuator based on the second set point. *See, e.g.*: *See, e.g.*, claim elements 1.8, 6.1-6.6 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 7	
[7] The medium of claim 1, wherein the record is a first record, the operations further comprising sending sensor data from the sensor to a plurality of records that comprises the first record, wherein the plurality of records is associated with a user.	In the Accused System, the record is a first record, and the operations further comprise sending sensor data from the sensor to a plurality of records that comprises the first record, wherein the plurality of records is associated with a user. *See, e.g.*: *See* claim 1 above. Sensor data is sent from the sensor to a plurality of records that comprises the first record. The controller (e.g., PLC) accesses a sensor to measure a fluid being handled by the fluid-handling device.

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 4 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 8	
[8.1] The medium of claim 1, wherein: the actuator controls a valve;	In the Accused System, the actuator controls a valve. *See, e.g.*: *See* claim 1 above. On information and belief, the actuator (e.g., Remote control) controls a valve. *See, e.g.*:

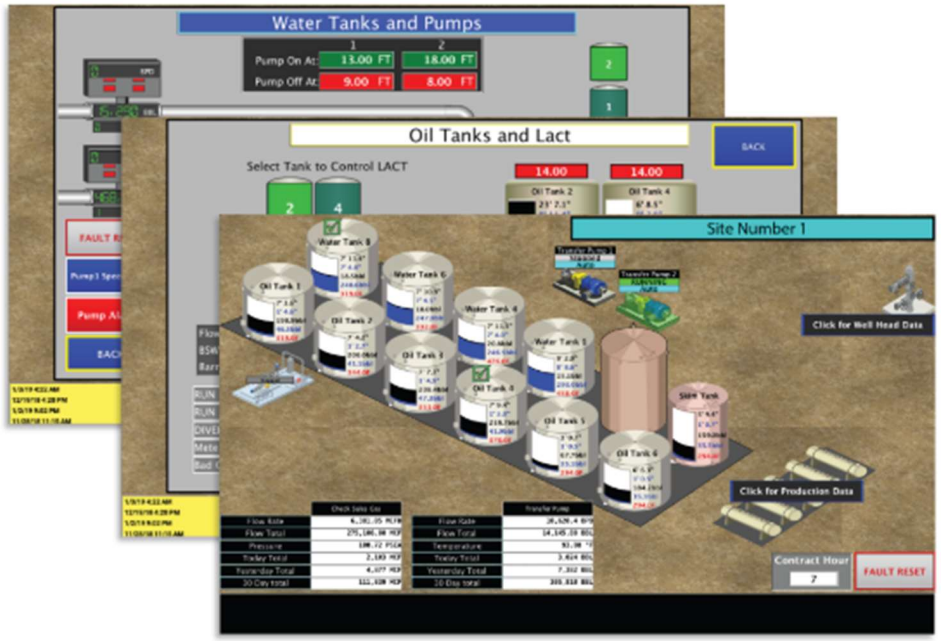
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1 (annotated).

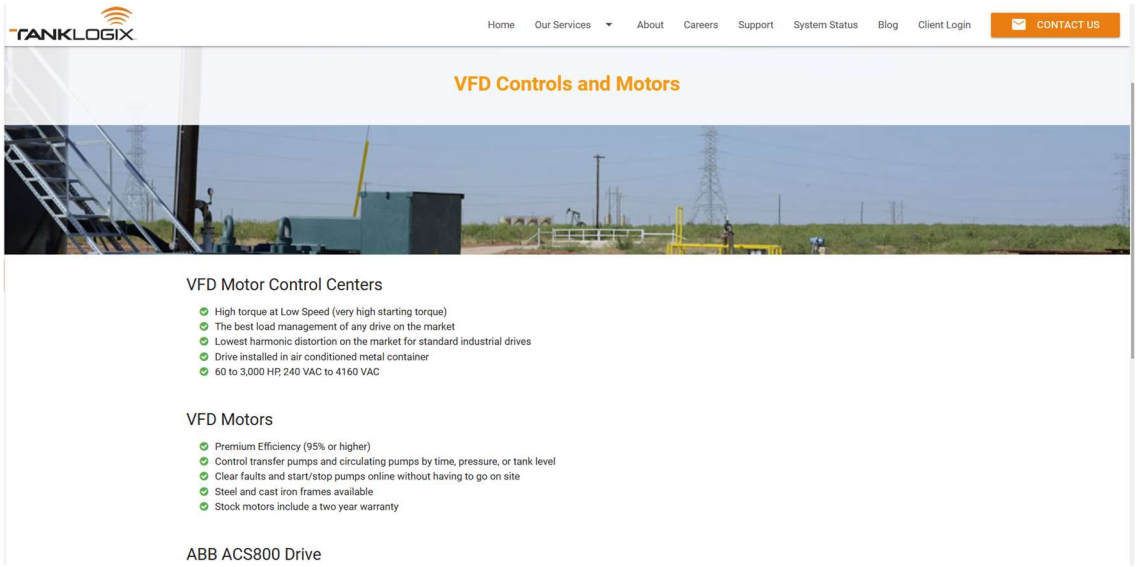
U.S. Patent No. 11,175,680	The TankLogix System
	 https://tanklogix.com/hosted-ignition. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

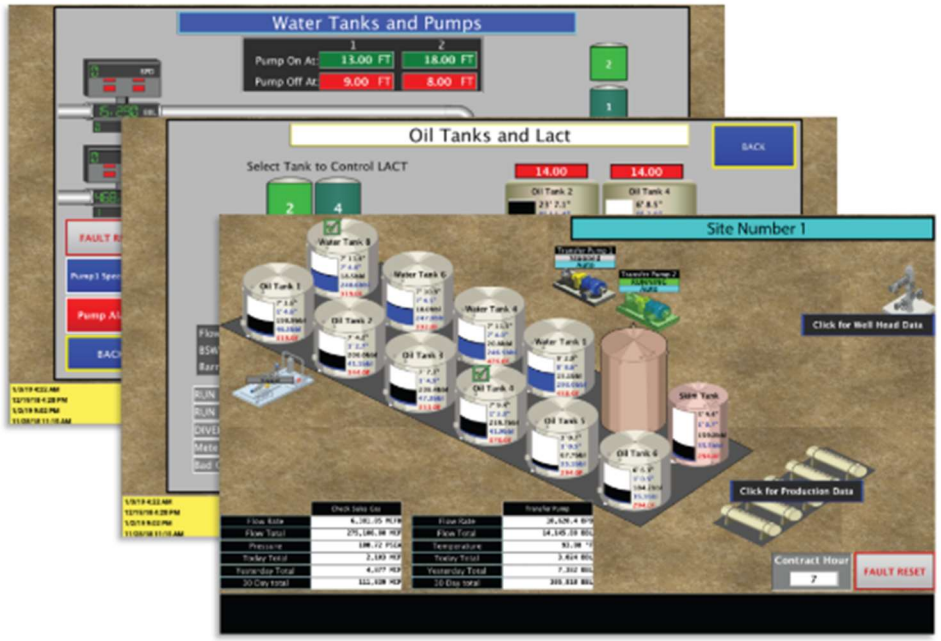
U.S. Patent No. 11,175,680	The TankLogix System
[8.2] the command comprises instructions to oscillate the valve using the actuator; and	The command in the Accused System comprises instructions to oscillate the valve using the actuator. *See, e.g.*:  Exhibit 1 (annotated).

U.S. Patent No. 11,175,680	The TankLogix System
	 https://tanklogix.com/hosted-ignition. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

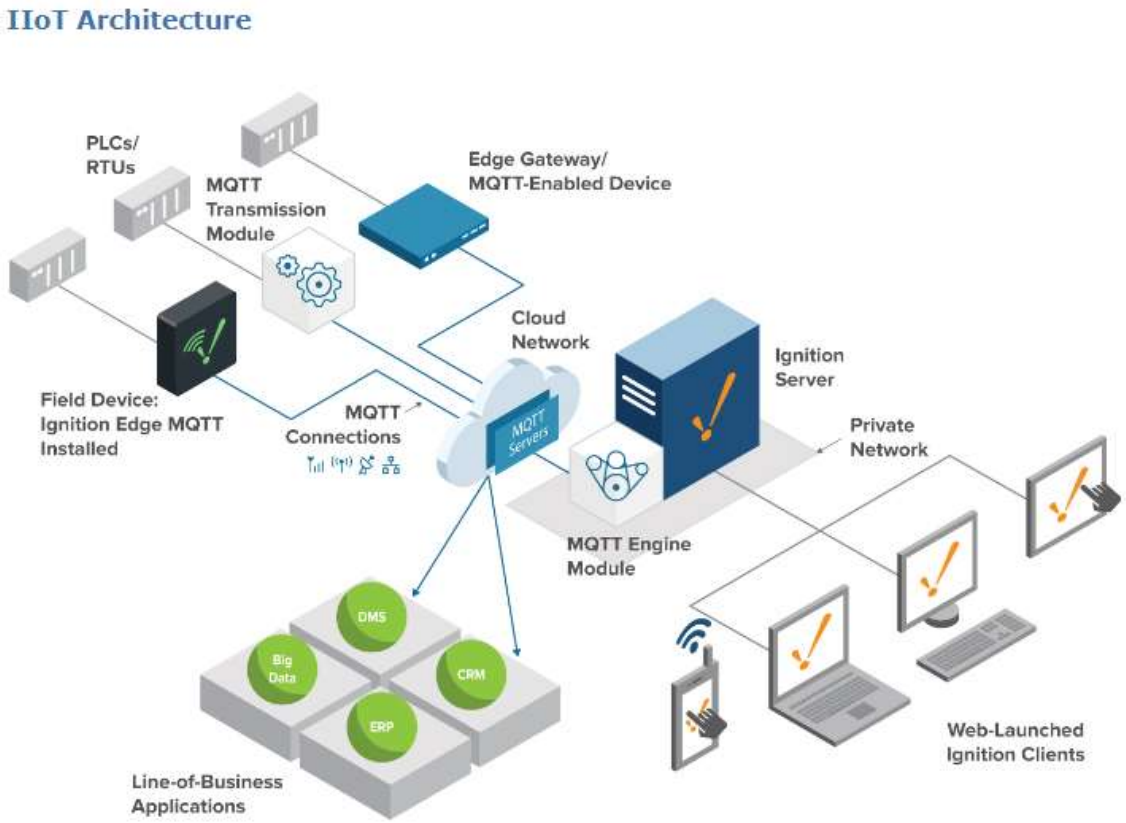
U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[8.3] controlling the actuator comprises translating, at the controller, the command to oscillate the valve into a sequence of high voltage and low voltage signals.	The Accused System performs controlling the actuator by translating, at the controller, the command to oscillate the valve into a sequence of high voltage and low voltage signals. *See, e.g.*: *See, e.g.*, claim elements 4.2, 8.2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 9	
[9] The medium of claim 1, wherein the measurement comprises at least one of a fluid flow rate, a fluid temperature, or a fluid pressure.	In the Accused System, the measurement comprises at least one of a fluid flow rate, a fluid temperature, or a fluid pressure. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 10	

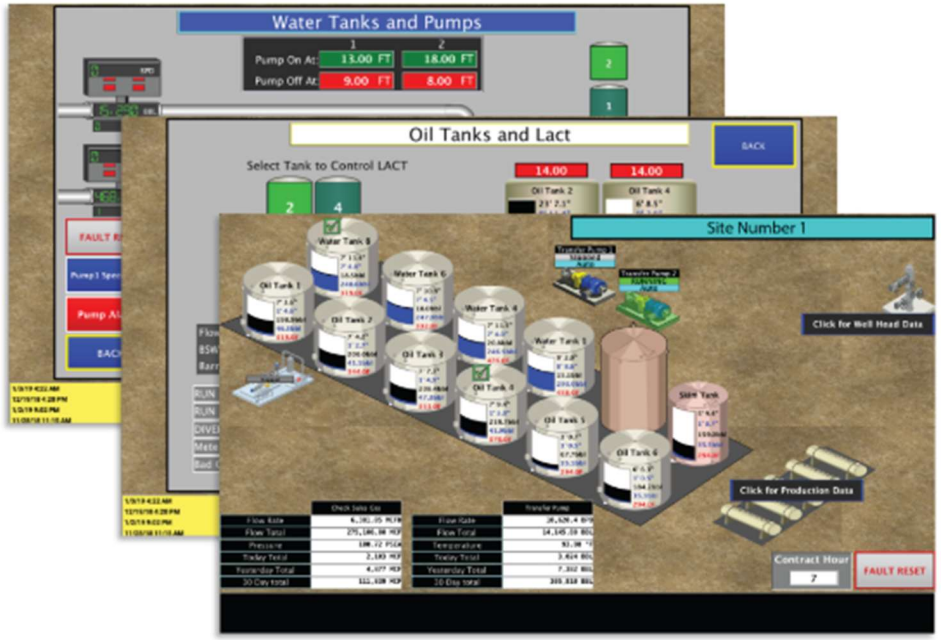
U.S. Patent No. 11,175,680	The TankLogix System
[10.1] The medium of claim 1, wherein the fluid-handling device is a first fluid-handling device of a plurality of fluid-handling devices, the operations further comprising:	In the Accused System, the fluid-handling device is a first fluid-handling device of a plurality of fluid-handling devices. *See, e.g.*: *See* claim 1 above. The fluid handling devices (e.g., "pumps") at a saltwater disposal facility are controlled. For example, a saltwater disposal facility includes pumps with motors powered by variable frequency drives (VFDs). *See, e.g.*:  Exhibit 4.

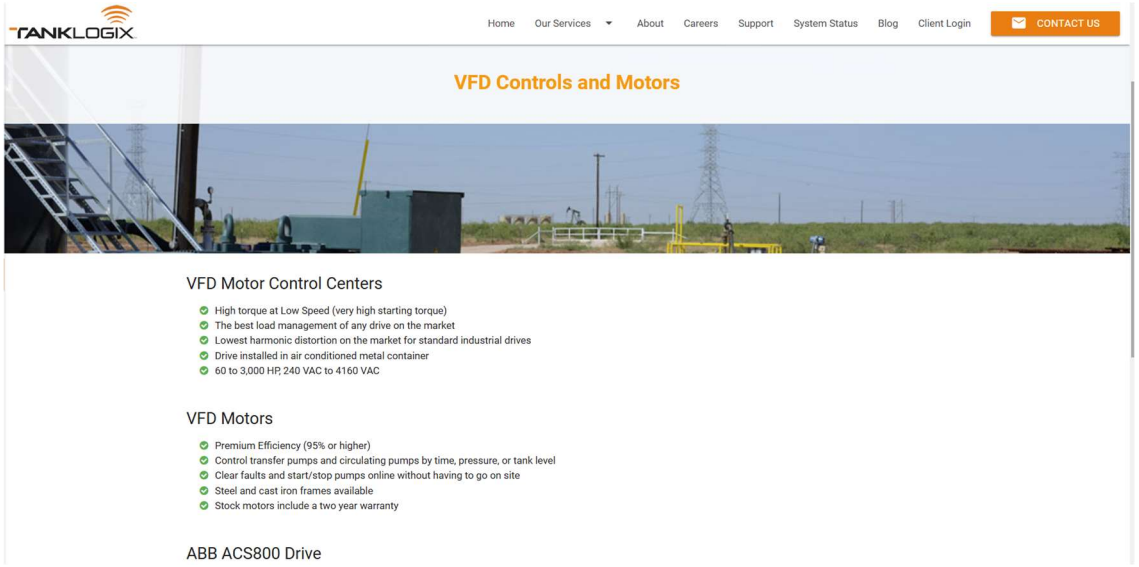
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

U.S. Patent No. 11,175,680	The TankLogix System
[10.2] polling, with the controller, the plurality of fluid-handling devices to collect a set of data comprising the measurement; and	The Accused System performs polling, with the controller, the plurality of fluid-handling devices to collect a set of data comprising the measurement. *See, e.g.*: *See, e.g.*, claim element 1.3 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[10.3] sending the set of data from the controller to the server.	The Accused System performs sending the set of data from the controller to the server in the schematic below via the network. *See, e.g.*:

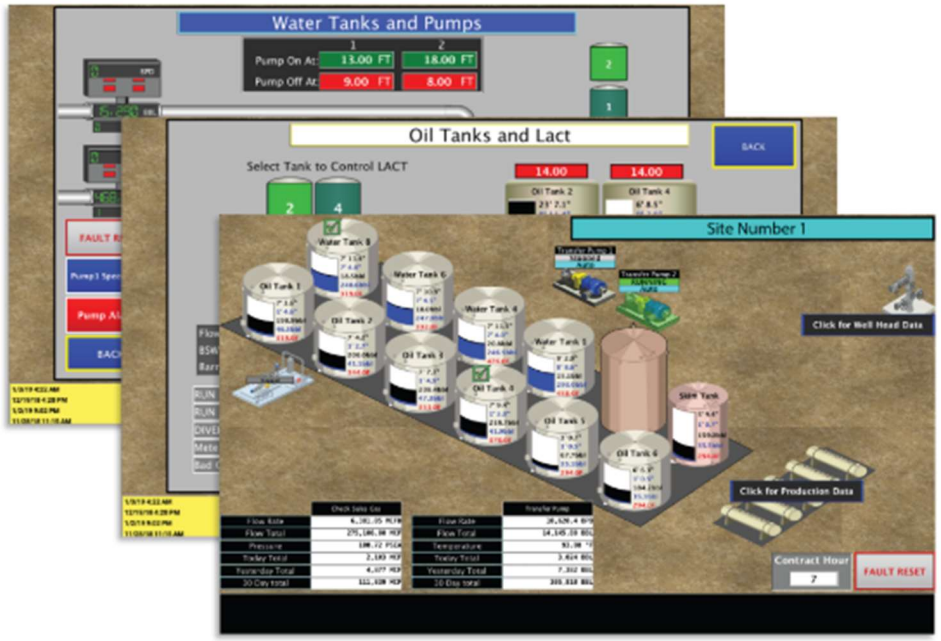
U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

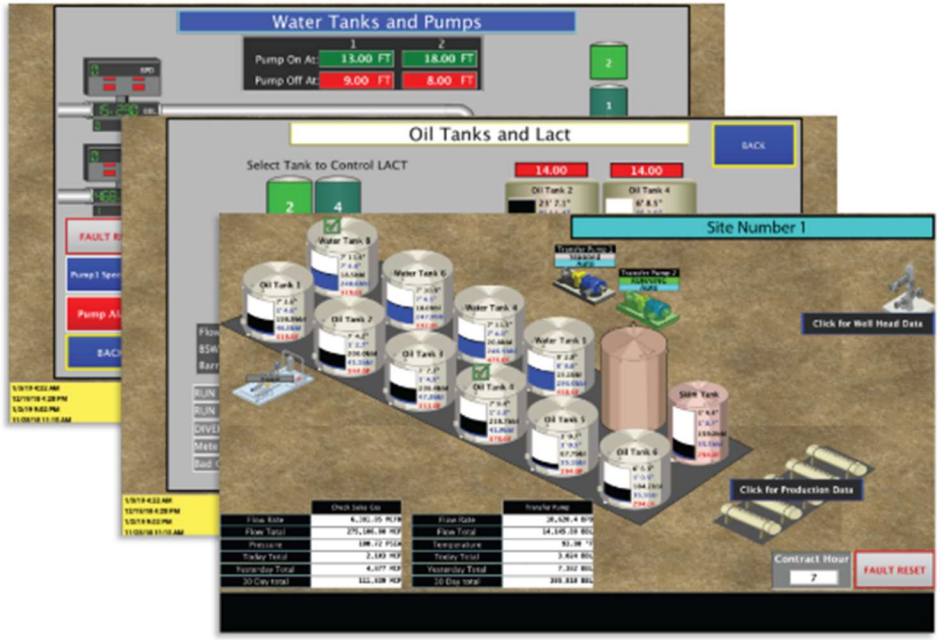
U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 11	
[11] The medium of claim 1, wherein the network comprises a wireless network, and sending the command comprises sending the command via a wireless signal.	In the Accused System, the network comprises a wireless network, and sending the command comprises sending the command via a wireless signal. *See, e.g.*: *See* claim 1 above. Tank Monitoring TankLogix provides a complete liquid inventory management system, the TankWarden. TankWarden empowers producers by giving them complete control over their liquid inventory and distribution. • Eliminate manual tank gauging • Web-based data tracking • Cellular and satellite communication for even the most remote locations • Single or dual level, high-precision, magnetostrictive sensors • TankLogix brand sensors are oil & gas field grade, made in USA • Provide flow and pressure readings to monitor pumps, flow lines, and vessels Exhibit 5. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 12	
[12.1] The medium of claim 1, wherein: the measurement is a first measurement of a plurality of measurements of the sensor;	The measurement performed in accordance with the Accused System is a first measurement of a plurality of measurements of the sensor. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,175,680	The TankLogix System
	For example, the plurality of measurements are shown on the interface below.  Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

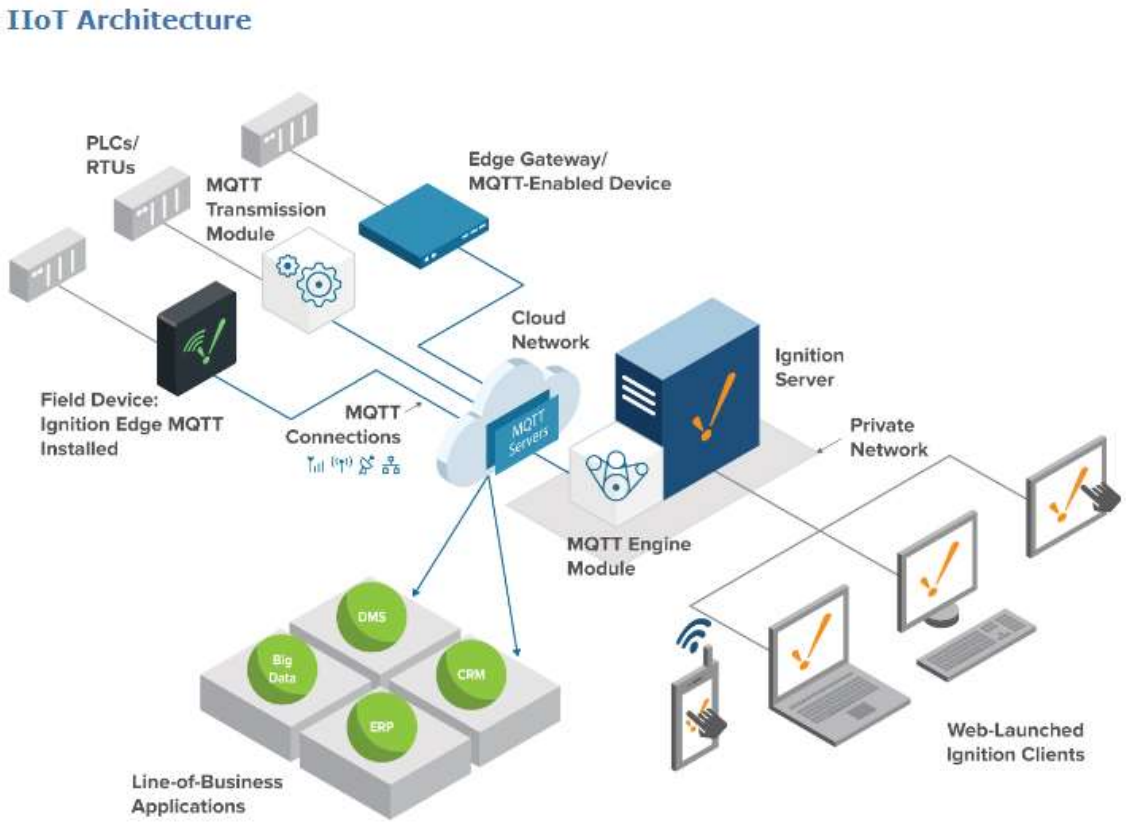
U.S. Patent No. 11,175,680	The TankLogix System
[12.2] wherein the target value is a value of a pattern of values; and	In the Accused System, the target value is a value of a pattern of values. *See, e.g.*: The command is effectuated by changing the state of the pump driven by the VFD to a sequence of different target values that change over time. The VFD undergoes a "soft start" to ramp up a target value of the pump, during which the target value of the pump gradually changes over time through a pattern of values. *See, e.g.*:  Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

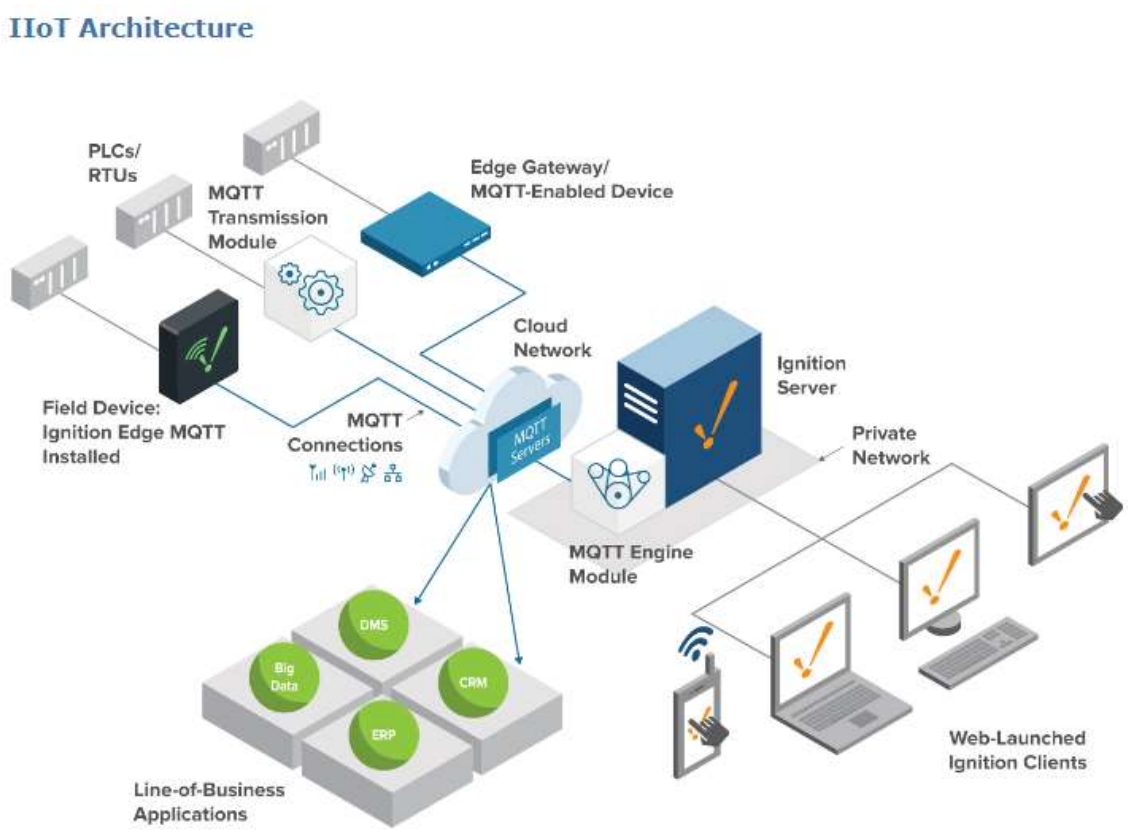
U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[12.3] determining whether the measurement satisfies the target value comprises determining whether the plurality of measurements satisfies the pattern of values.	The Accused System performs determining whether the measurement satisfies the target value by determining whether the plurality of measurements satisfies the pattern of values. *See, e.g.*: *See, e.g.*, claim element 1.6 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 13	
[13] The medium of claim 12, wherein the pattern of values comprises a pattern of valve configurations.	In the Accused System, the pattern of values comprises a pattern of valve configurations. *See, e.g.*: *See* claim 12 above. For example, the pattern of valve configurations are shown on the interface below. *See, e.g.*:

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 14	

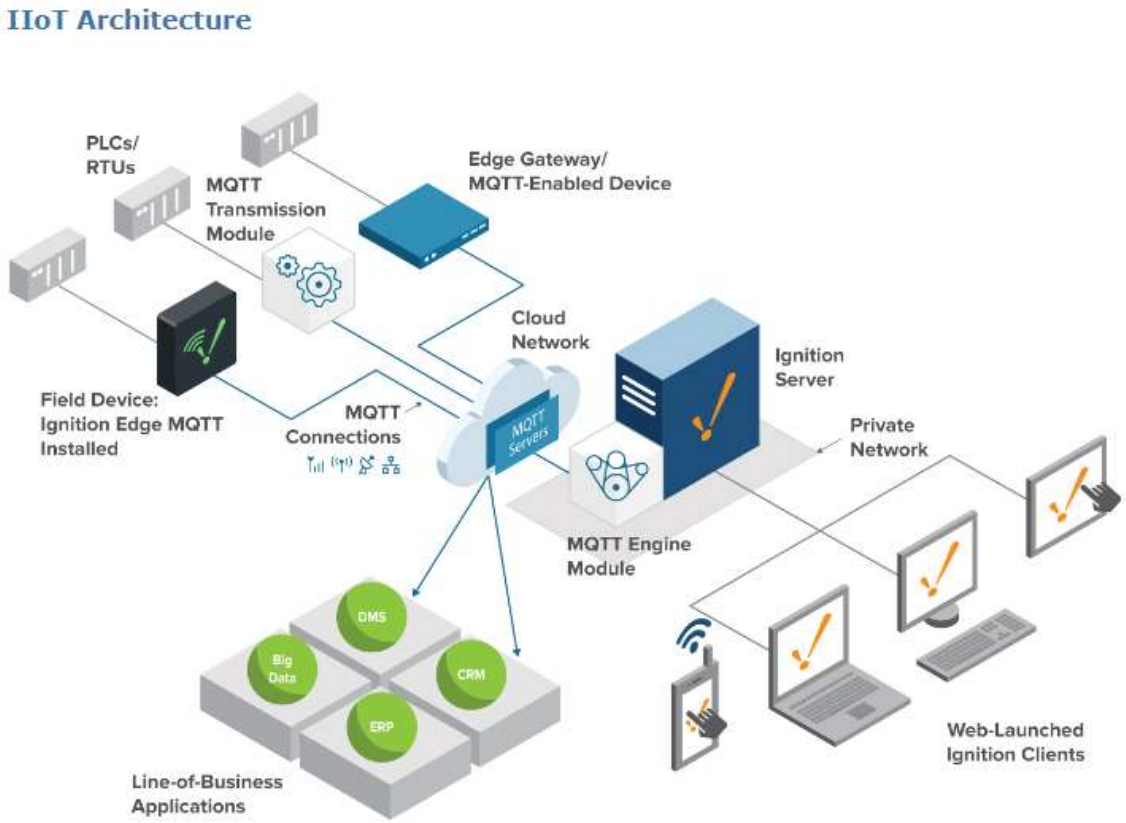
U.S. Patent No. 11,175,680	The TankLogix System
[14] The medium of claim 1, wherein the sensor comprises a level sensor of a separation tank to indicate a level at which a first fluid phase meets a second fluid phase.	In the Accused System, the sensor includes a level sensor of a separation tank to indicate a level at which a first fluid phase meets a second fluid phase. *See, e.g.*: *See* claim 1 above.  Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

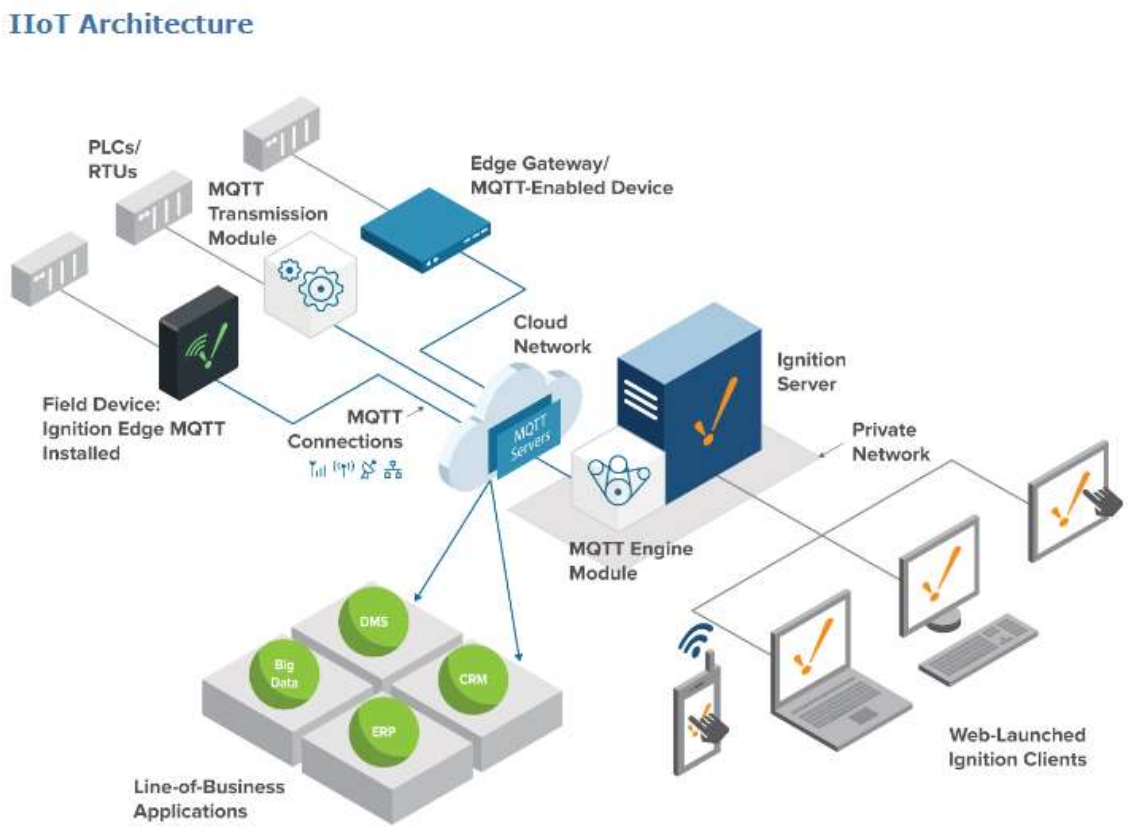
U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 15	
[15.1] The medium of claim 1, wherein: the server comprises a web server; and	In the Accused System, the server comprises a web server. *See, e.g.*: *See* claim 1 above. The server in the Accused System includes a web server. The web server is used by the Web-Launched Ignition Clients shown by the schematic below. *See, e.g.*:

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

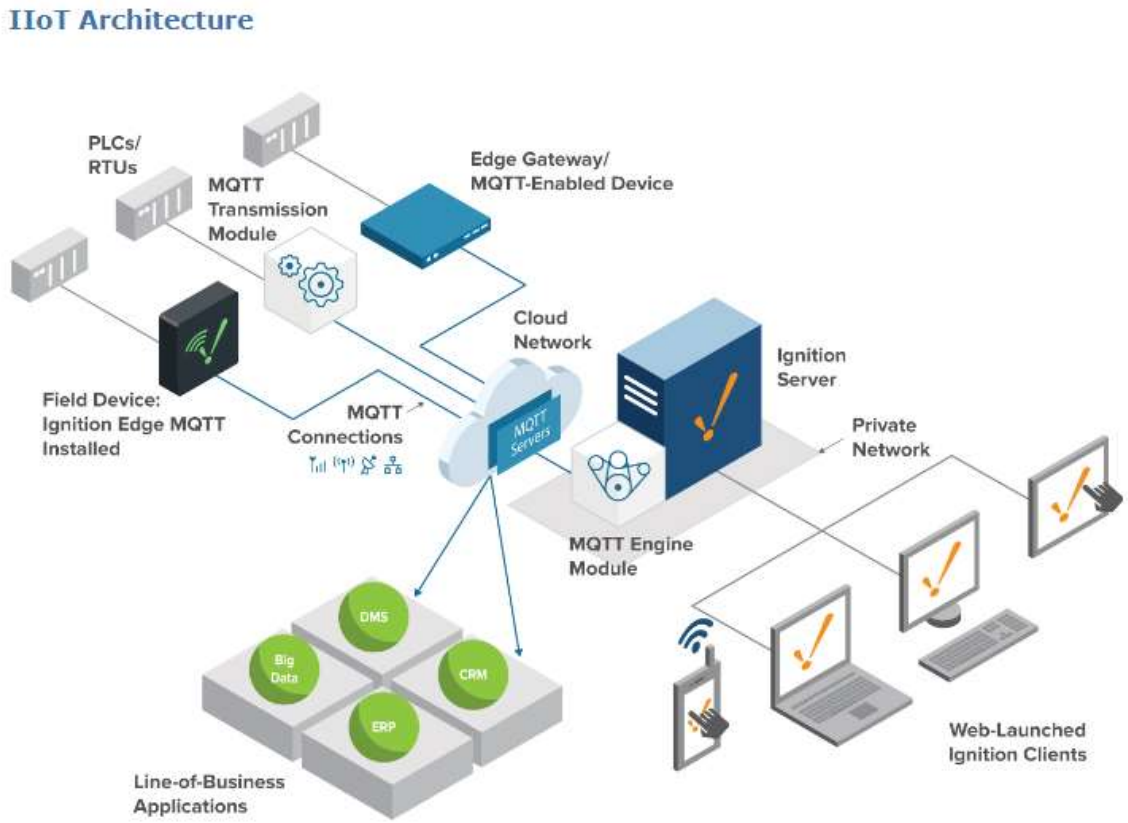
U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[15.2] the controller comprises a site server distinct from the web server.	In the Accused System, the controller comprises a site server distinct from the web server. *See, e.g.*: The site server in the Accused System is, for example, the PLC shown by the schematic below. *See, e.g.*: 

U.S. Patent No. 11,175,680	The TankLogix System
	Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 16	
[16.1] The medium of claim 15, wherein: the server communicates with a plurality of user devices via a first network port of the web server, wherein the plurality of user devices comprises the computing device; and	In the Accused System, the server communicates with a plurality of user devices via a first network port of the web server, wherein the plurality of user devices comprises the computing device. The server communicates with a plurality of user devices via a first network port of the web server. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[16.2] the site server communicates with facilities via a second network port of the computing device, wherein the second network port being different from the first network port, and wherein a facility of the facilities comprises the fluid-handling device.	In the Accused System, the site server communicates with facilities via a second network port of the computing device, wherein the second network port being different from the first network port, and wherein a facility of the facilities comprises the fluid-handling device. *See, e.g.*: 

U.S. Patent No. 11,175,680	The TankLogix System
	Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 17	
[17] The medium of claim 1, wherein controlling the actuator based on the set point comprise steps for controlling the actuator.	In the Accused System, controlling the actuator based on the set point comprise steps for controlling the actuator. *See, e.g.*: *See* claim 1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 18	
[18] The medium of claim 1, wherein receiving the command comprises receiving the command via a web interface on the computing device.	In the Accused System, receiving the command comprises receiving the command via a web interface on the computing device. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,175,680	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 19	
[19] The medium of claim 1, wherein the controller is communicatively coupled to the fluid-handling device via a frame-based carrier-sense multiple access protocol.	The controller of the Accused System is communicatively coupled to the fluid-handling device via a frame-based carrier-sense multiple access protocol. *See, e.g.*: *See* claim 1 above. On information and belief, the controllers use TCP/IP (e.g., Ethernet) signals to communicate with the fluid-handling devices. Ethernet is a frame-based carrier-sense multiple access protocol. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 20	
[20.1] A method comprising:	The Accused System performs a method. *See, e.g.*, claim elements 1.2-1.8 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.2] receiving, with a server, a command comprising a target value of a fluid-handling device from a computing device via a control interface, wherein the command is received in association with a record stored on a datastore;	The Accused System performs receiving, with a server, a command comprising a target value of a fluid-handling device from a computing device via a control interface, wherein the command is received in association with a record stored on a datastore. *See, e.g.*: *See, e.g.*, claim element 1.2 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.3] determining, with the server, a network address of a network based on the record, wherein the network address identifies a controller of the fluid-handling device, and wherein the controller accesses a sensor to measure a fluid being handled by the fluid-handling device and an actuator of the fluid-handling device;	The Accused System performs determining, with the server, a network address of a network based on the record, wherein the network address identifies a controller of the fluid-handling device, and wherein the controller accesses a sensor to measure a fluid being handled by the fluid-handling device and an actuator of the fluid-handling device. *See, e.g.*: *See, e.g.*, claim element 1.3 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,175,680	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.4] sending, with the server, the target value to the network address via the network;	The Accused System performs sending, with the server, the target value to the network address via the network. *See, e.g.*: *See, e.g.*, claim element 1.4 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.5] receiving, with the controller, a measurement of the fluid by the sensor;	The Accused System performs receiving, with the controller, a measurement of the fluid by the sensor. *See, e.g.*: *See, e.g.*, claim element 1.5 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.6] determining, with the controller, whether the measurement satisfies the target value;	The Accused System performs determining, with the controller, whether the measurement satisfies the target value. *See, e.g.*:

U.S. Patent No. 11,175,680	The TankLogix System
	See, e.g., claim element 1.6 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.7] in response to a determination that the measurement does not satisfy the target value, obtaining, with the controller, a set point based on the command; and	The Accused System performs obtaining, with the controller, a set point based on the command in response to a determination that the measurement does not satisfy the target value. *See, e.g.*: *See, e.g.*, claim element 1.7 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.8] controlling the actuator based on the set point.	The Accused System performs controlling the actuator based on the set point. *See, e.g.*: *See, e.g.*, claim element 1.8 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

U.S. Patent No. 11,175,680	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

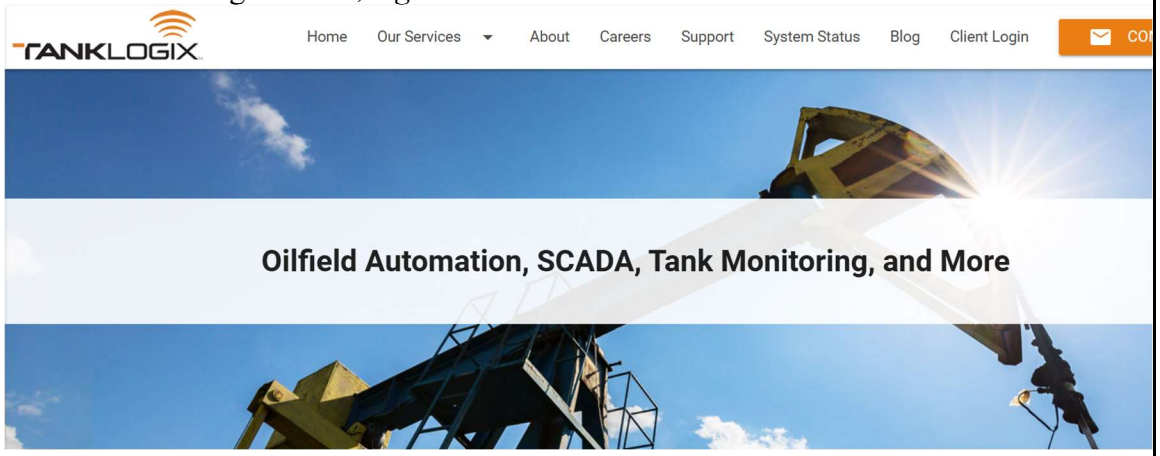
Exhibit D

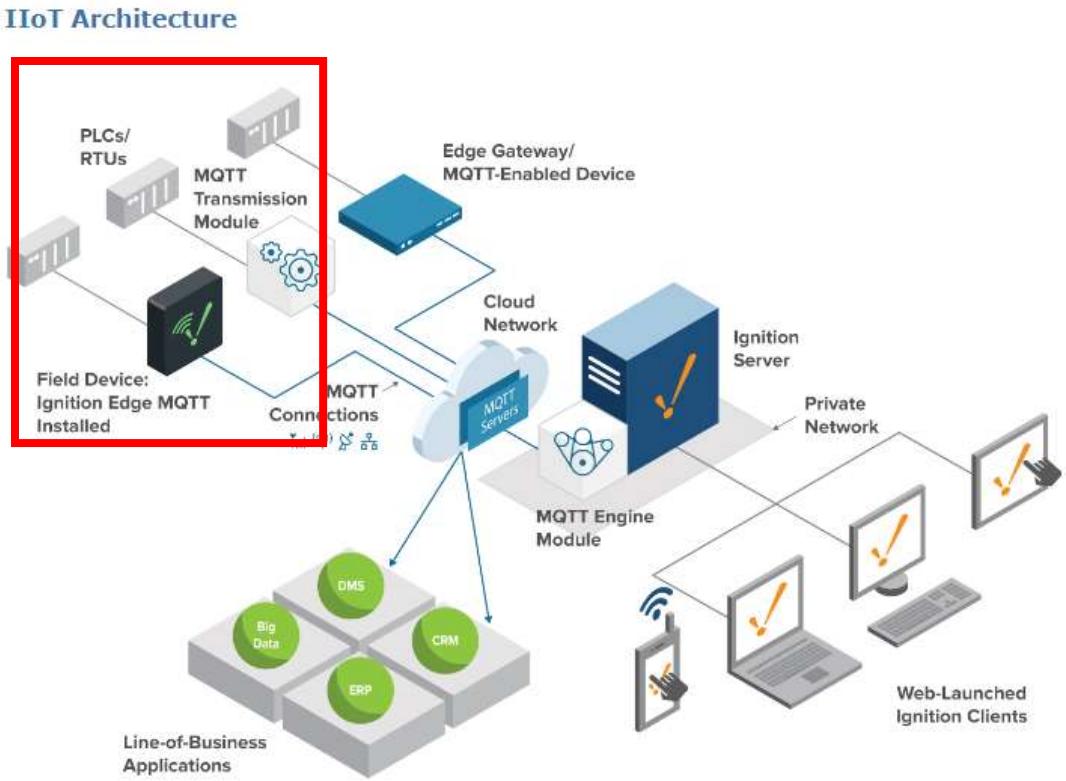
Infringement Analysis of U.S. Patent No. 11,726,504 Against the TankLogix Ignition-Hosted Automation System Implemented by TankLogix

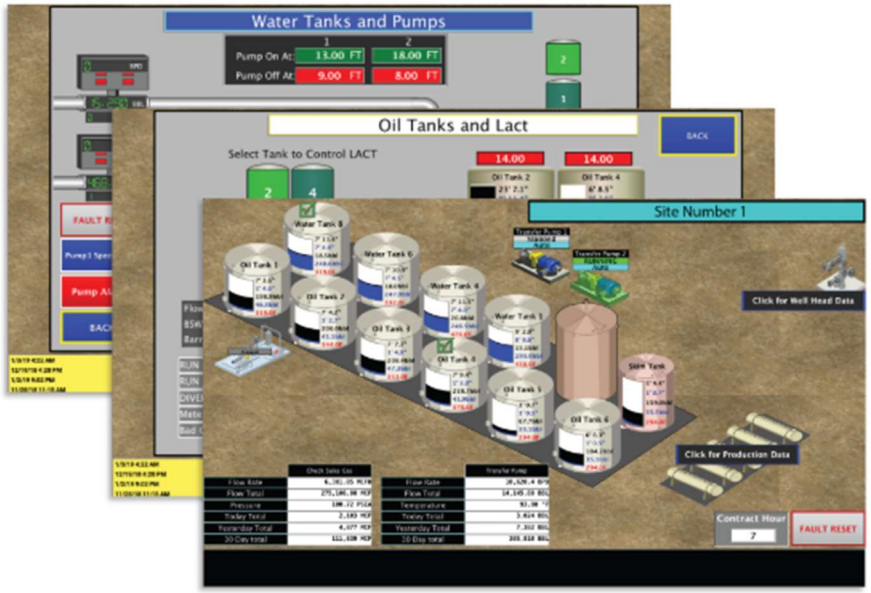
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System each element of claims 1-20 of U.S. Patent No. 11,726,504 (the "'504 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed, implemented, maintained, sold, offered for sale, used, made, or imported into the U.S. by TankLogix, LLC.

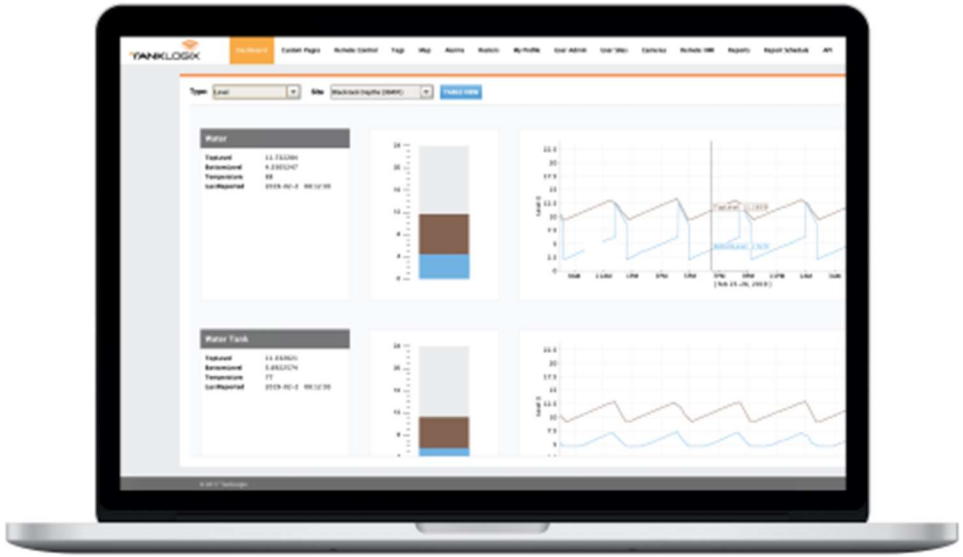
References Cited:

- Exhibit 1, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 2, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 3, https://tanklogix.com/vfd-controls-and-motors/.
- Exhibit 4, https://inductiveautomation.com/ignition/modules/perspective.
- Exhibit 5, https://mqtt.org/.
- Exhibit 6, https://tanklogix.com/tank-monitoring/benefits.
- Exhibit 7, https://www.tanklogix.com/.
- Exhibit 8, https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition.

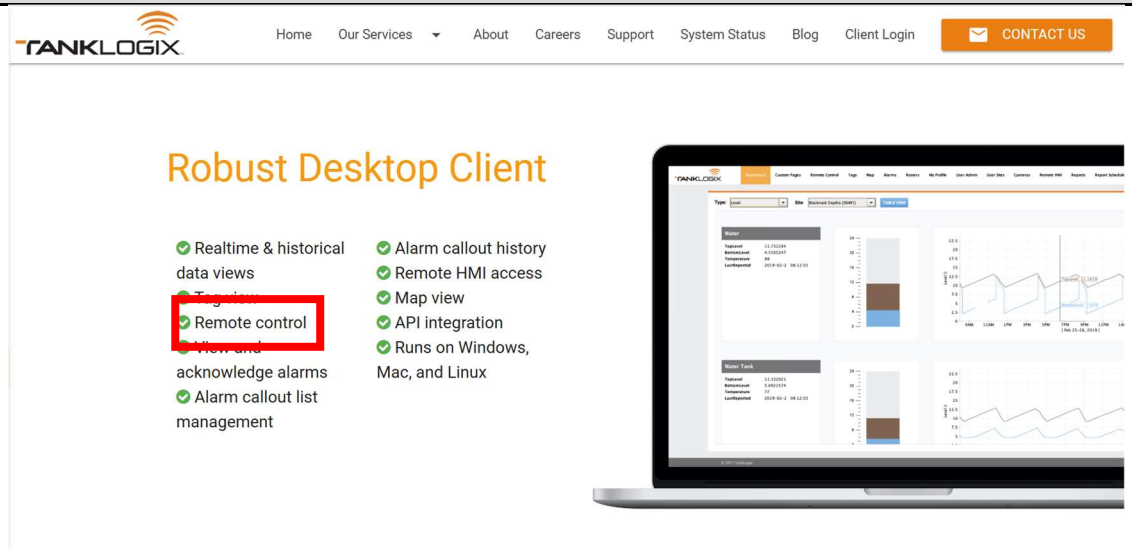
U.S. Patent No. 11,726,504	The TankLogix System
Claim 1	
[1.1] A fluid processing system, comprising: a first computer system disposed at a first fluid handling site,	Regardless of whether the preamble limits the scope of the claim, the Accused System include a fluid processing system, comprising: a first computer system disposed at a first fluid handling site. *See, e.g.*:  Exhibit 7. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.2] wherein the first computer system is configured to: receive information comprising one or more properties of a first fluid from one or more sensors disposed at a first fluid	In the Accused System, the first computer system is configured to: receive information comprising one or more properties of a first fluid from one or more sensors disposed at a first fluid tank itself disposed at the first fluid-handling site. *See, e.g.*:

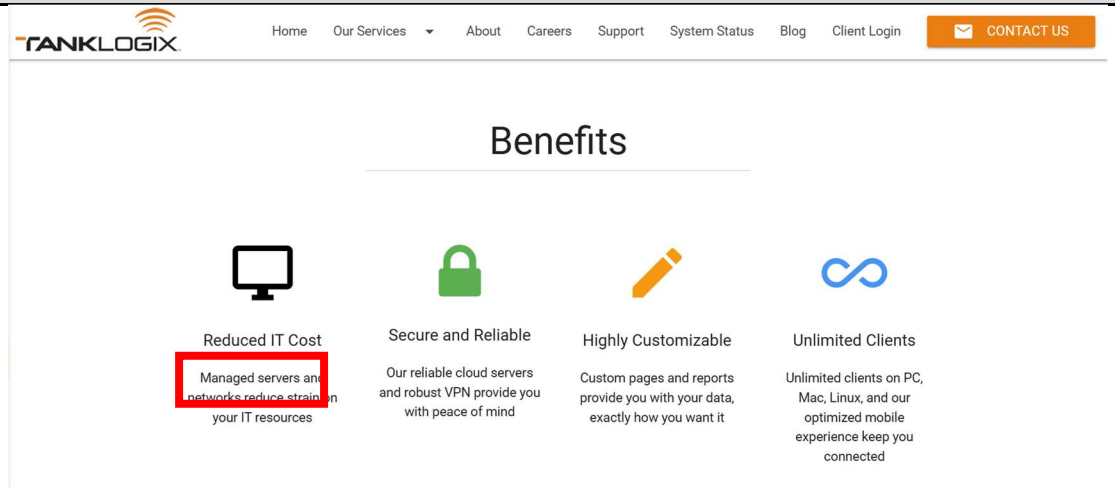
U.S. Patent No. 11,726,504	The TankLogix System
tank itself disposed at the first fluid-handling site,	 Exhibit 1. **Comprehensive Hosted SCADA** TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered by Inductive Automation's Ignition platform. Easily connect with, collect data from, and control your field devices over our secure network. Your data is safely hosted on our cloud-based infrastructure, providing top-tier reliability and integrity. Intuitive design and robust features in our desktop and mobile software provide powerful insights and monitoring of your data and operations. Reduce IT resource strain by having us handle the software development, network, IT infrastructure, and maintenance so you can focus on production and profitability. Exhibit 2.

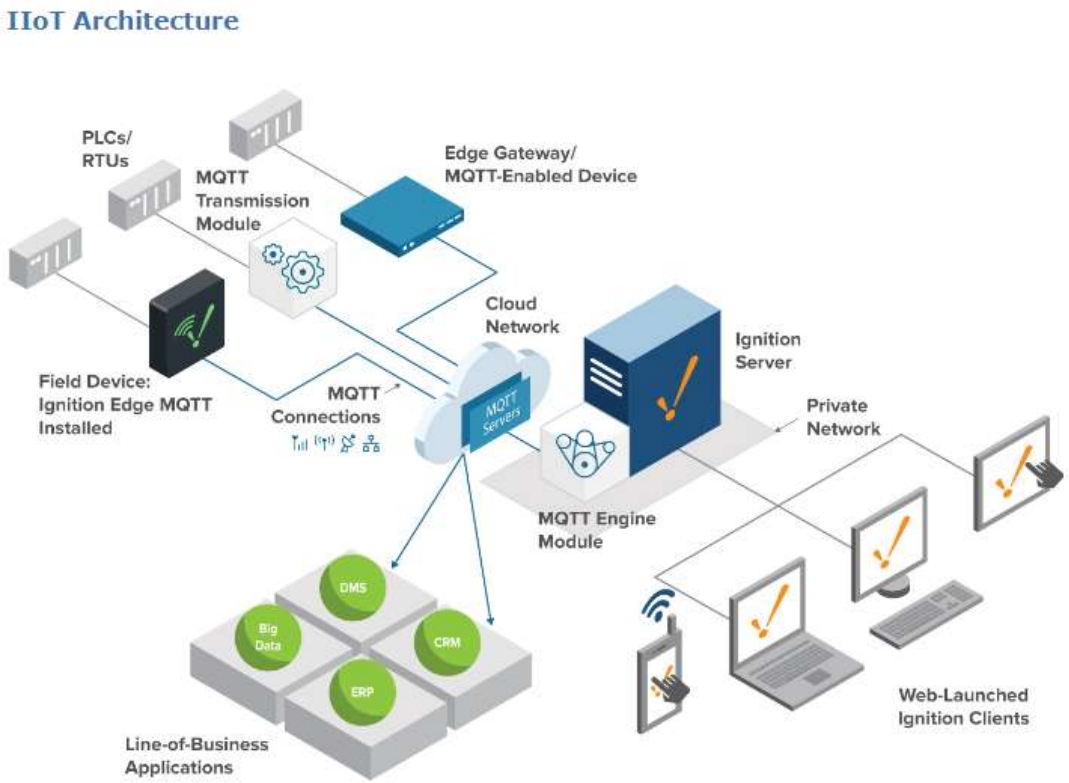
U.S. Patent No. 11,726,504	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.3] the fluid-handling site comprising one or more fluid-handling devices, the one or more fluid-handling devices comprising one or more of a first pump, a first filter, and a first valve; and	In the Accused System, the fluid-handling site comprises one or more fluid-handling devices, the one or more fluid-handling devices comprising one or more of a first pump, a first filter, and a first valve. *See, e.g.*:  Exhibit 2.

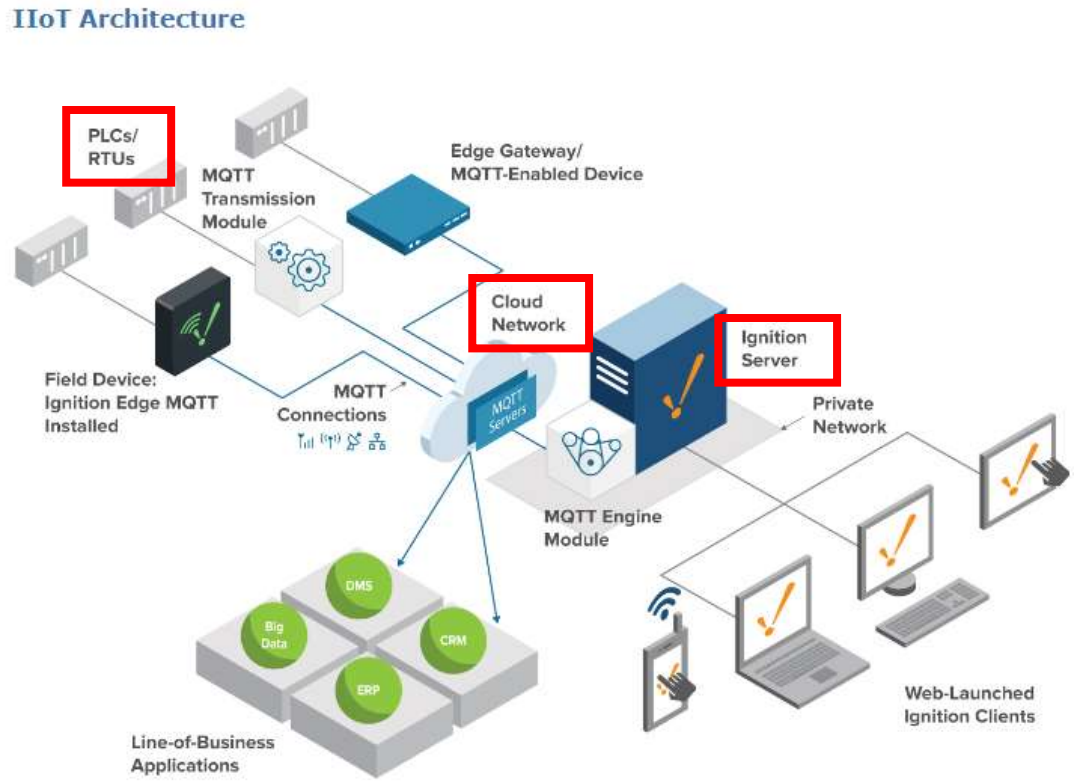
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2.

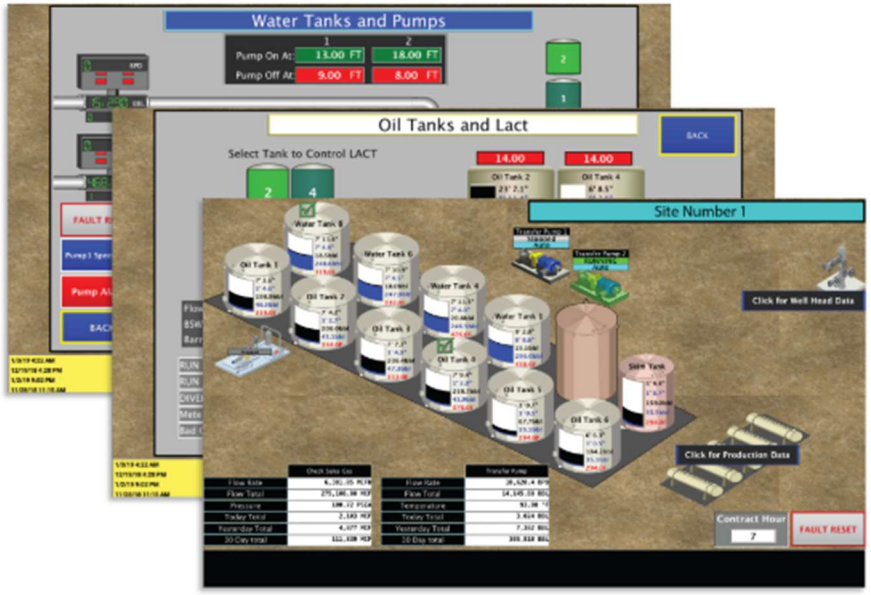
U.S. Patent No. 11,726,504	The TankLogix System
	TANKLOGIX Produced Wastewater This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate truck dispatching to ensure that the producer doesn't have to slow down production. TankLogix recognizes that trucking this water is expensive, which is why minimizing trucking expenses can greatly increase the bottom line. The Tank Warden System enhances transparency and accountability for both operators and transporters. The Tank Warden System can be configured to restrict access to the valve if the driver of the truck is not verified; it can also report instantly the amount of water/product that has been taken. This system has successfully enhanced tank security, while reducing theft and human error. TankLogix has implemented the Tank Warden System at water disposal sites as well. These customers especially enjoy the automatic tank gauging system because they don't have to employ someone to permanently watch the tanks. TankLogix has also provided other automated tank monitoring and field monitoring services to water disposal companies. Some of the other devices TankLogix can monitor at the wellhead are: Flow Meters Pumps H_2S and other gasses Premium Sensors Exhibit 2. The above images show at least a pump and a valve. On information and belief, the Accused System includes filters, as is typical for oil and SWD facilities The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.4] provide remote control of a first fluid-handling device of the one or more fluid-handling devices; and	The Accused System provides remote control of a first fluid-handling device of the one or more fluid-handling devices. *See, e.g.*:

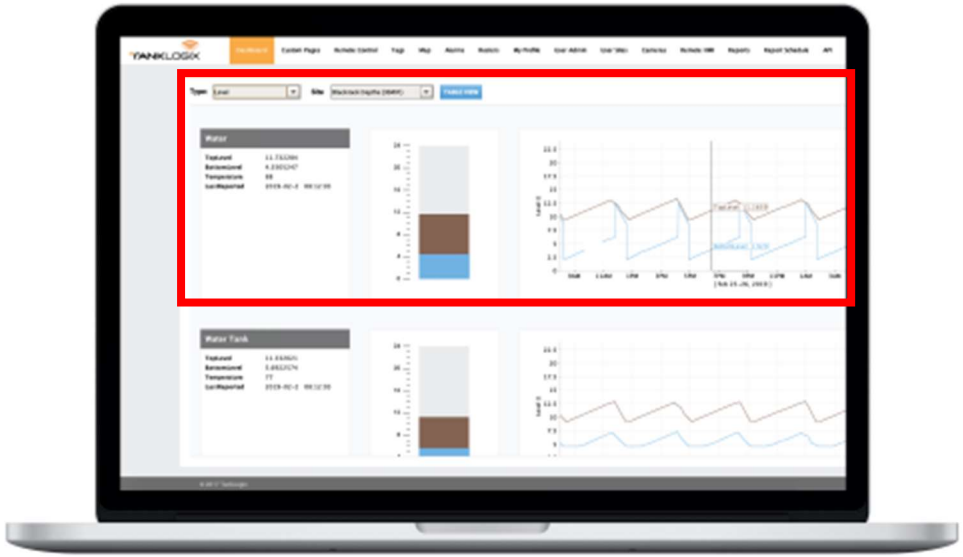
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.5] a server system wherein the server system has memory storing instructions that, when executed, effectuate operations comprising:	The Accused System has a server system wherein the server system has memory storing instructions that, when executed, effectuate operations. *See, e.g.*:

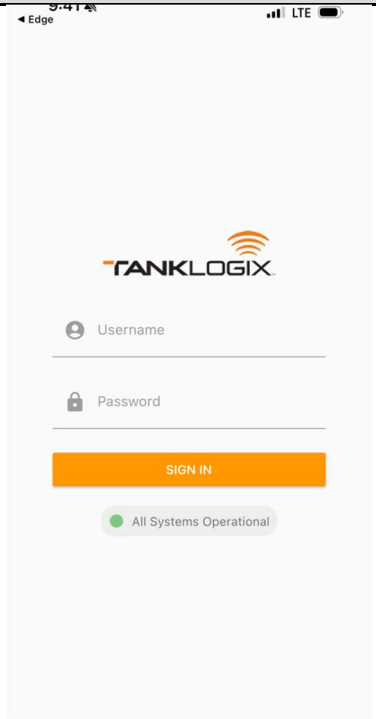
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2. The Accused System includes servers that host the Ignition platform. As shown in the example below, the Ignition platform includes an Ignition Server that effectuates operations (e.g., by executing commands from Web-Launched Ignition Clients).

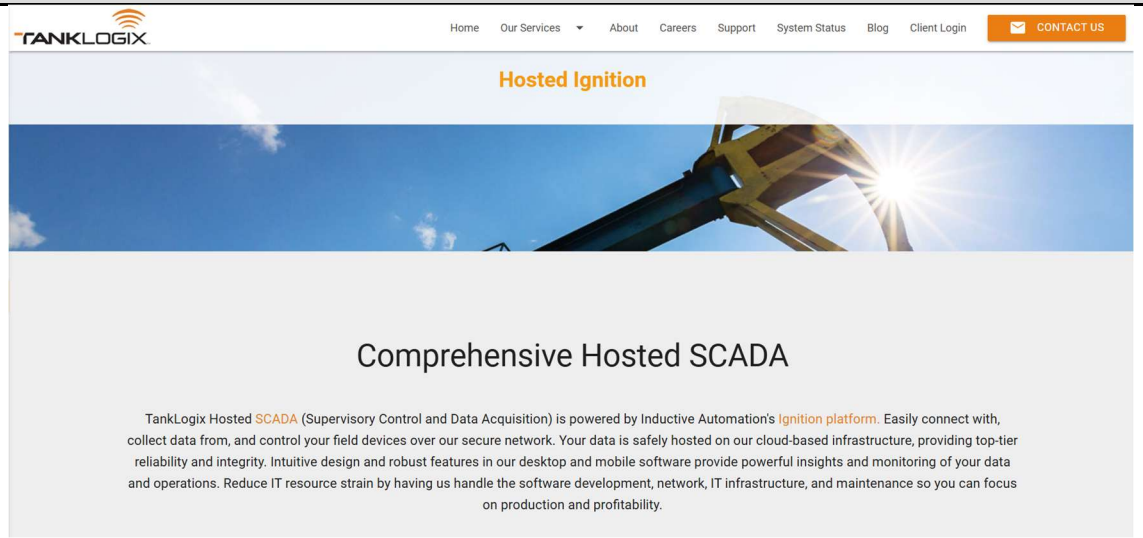
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.

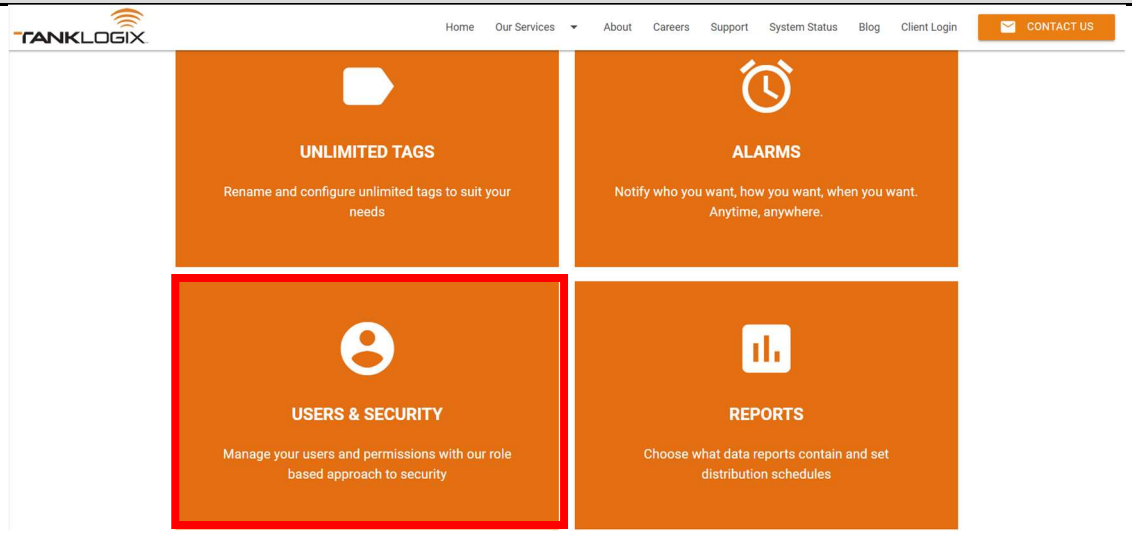
U.S. Patent No. 11,726,504	The TankLogix System
[1.6] receiving, with the server system, from the first computer system, via a network, a first fluid property of the one or more properties associated with the first fluid sensed by a first sensor of the one or more sensors;	The Accused System receives, with the server system, from the first computer system, via a network, a first fluid property of the one or more properties associated with the first fluid sensed by a first sensor of the one or more sensors. *See, e.g.*:  Exhibit 1.

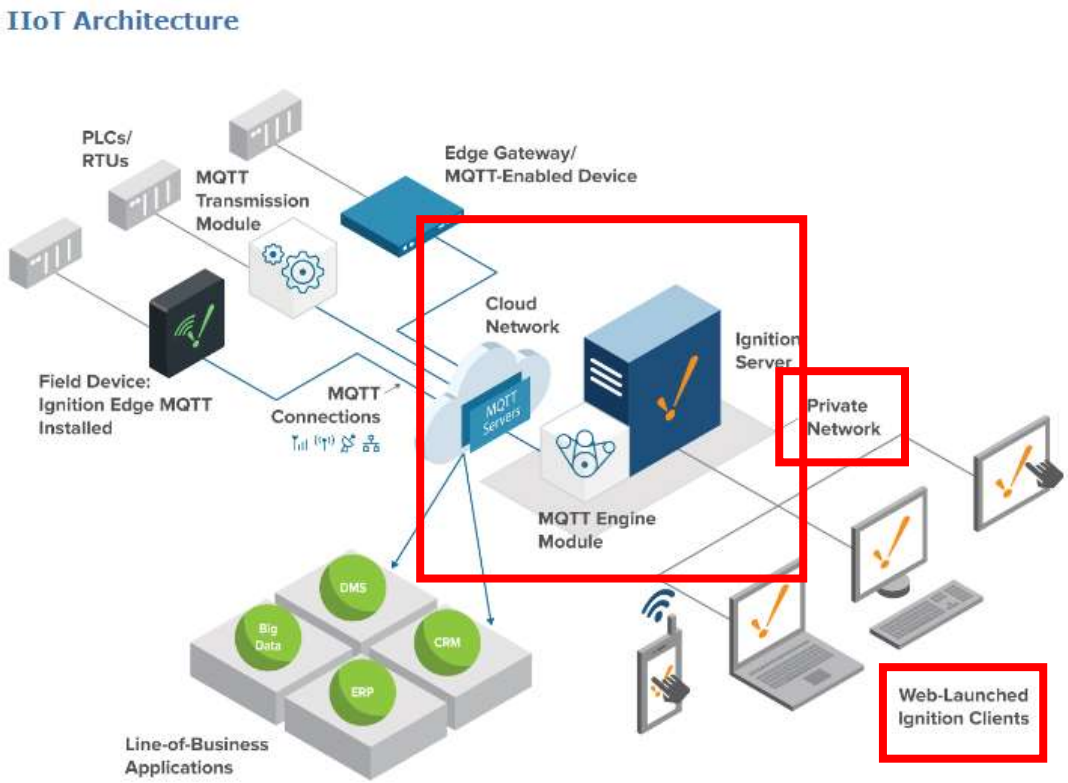
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2.

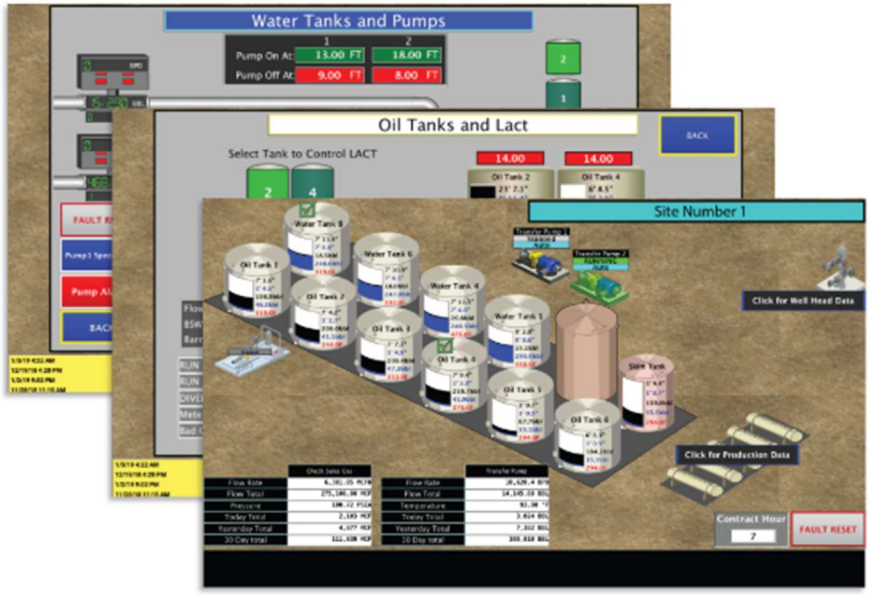
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.7] obtaining, with the server system, credentials from a first client computing device;	The Accused System obtains, with the server system, credentials from a first client computing device. *See, e.g.*:

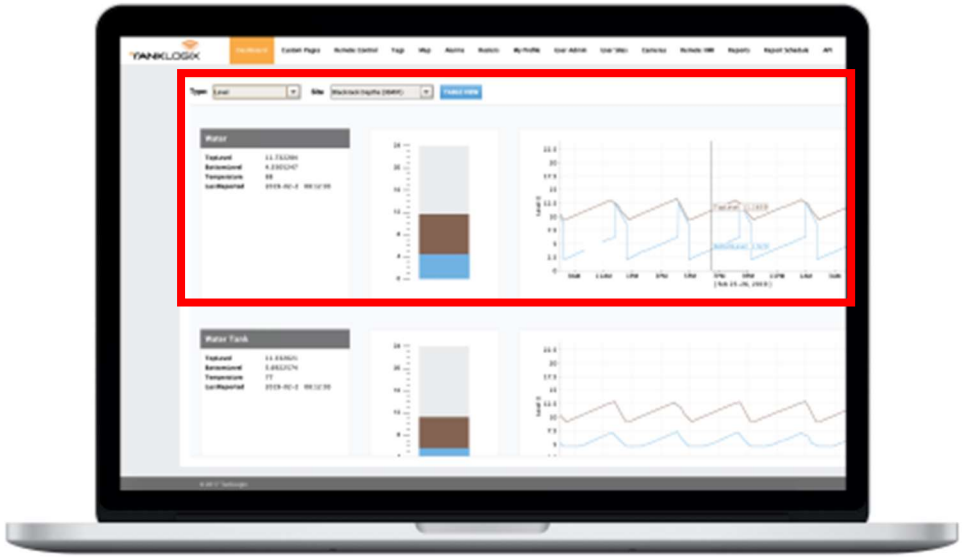
U.S. Patent No. 11,726,504	The TankLogix System
	 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.8] determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with	The Accused System determines, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact. *See, e.g.*, claim element 1.7.

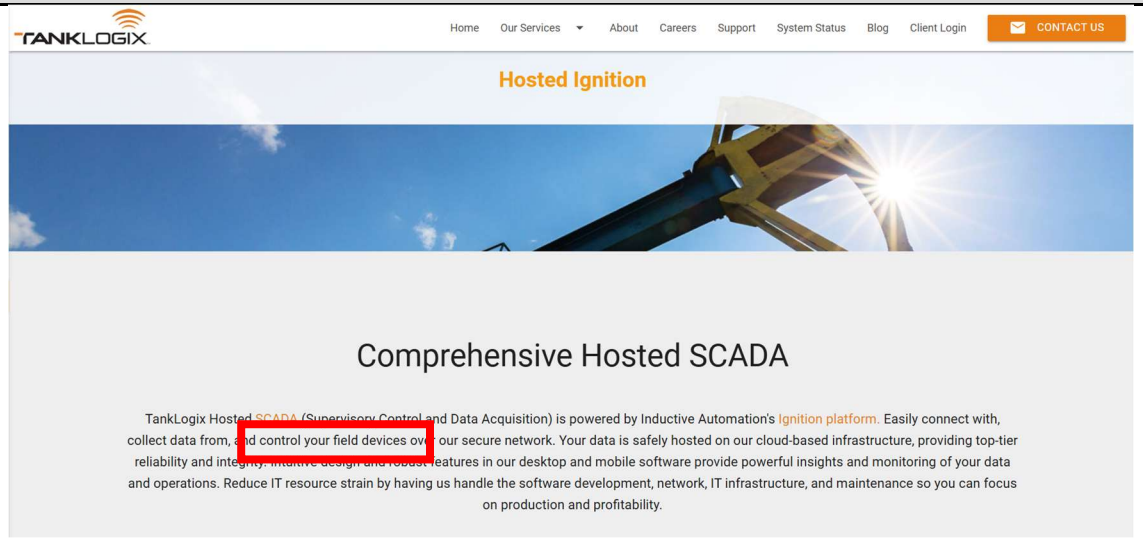
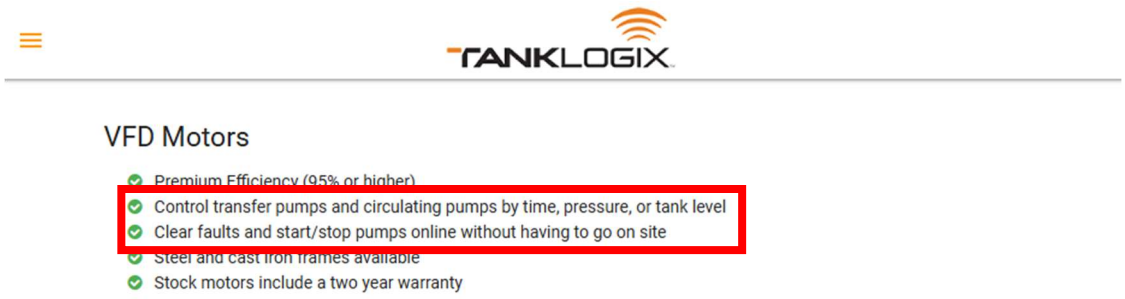
U.S. Patent No. 11,726,504	The TankLogix System
the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact;	 Exhibit 2. On information and belief, the Accused System provides access to TankLogix customer organizations to monitor fluid handling sites.

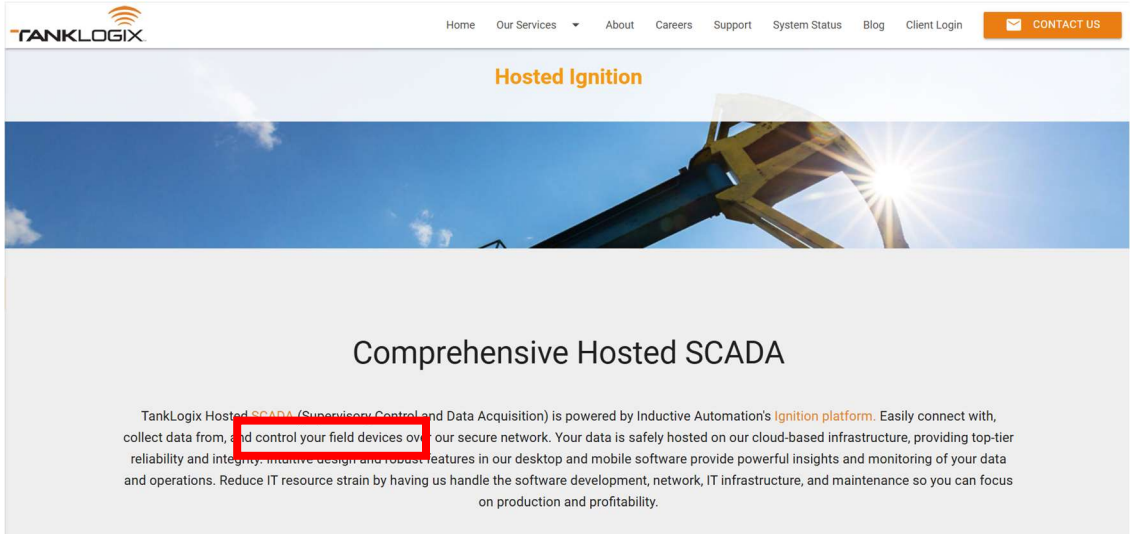
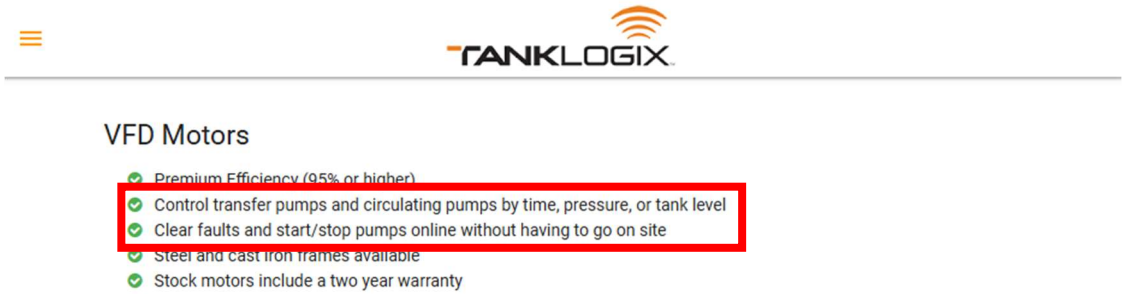
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.9] after the determination, providing, with the server system, via the network, information by which a first client computing device presents a user interface indicating the first fluid property, the first client computing	The Accused System after the determination, provides, with the server system, via the network, information by which a first client computing device presents a user interface indicating the first fluid property, the first client computing device being remote from the server system and the first computer system. *See, e.g.*:

U.S. Patent No. 11,726,504	The TankLogix System
device being remote from the server system and the first computer system;	 Exhibit 1.

U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2.

U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.10] receiving, with the server system, from the first client computing device, a first command to change a	The server system of the Accused System receives from the first client computing device, a first command to change a state of the first fluid-handling device. *See, e.g.*, portion of claim element 1.4 relating to remote control.

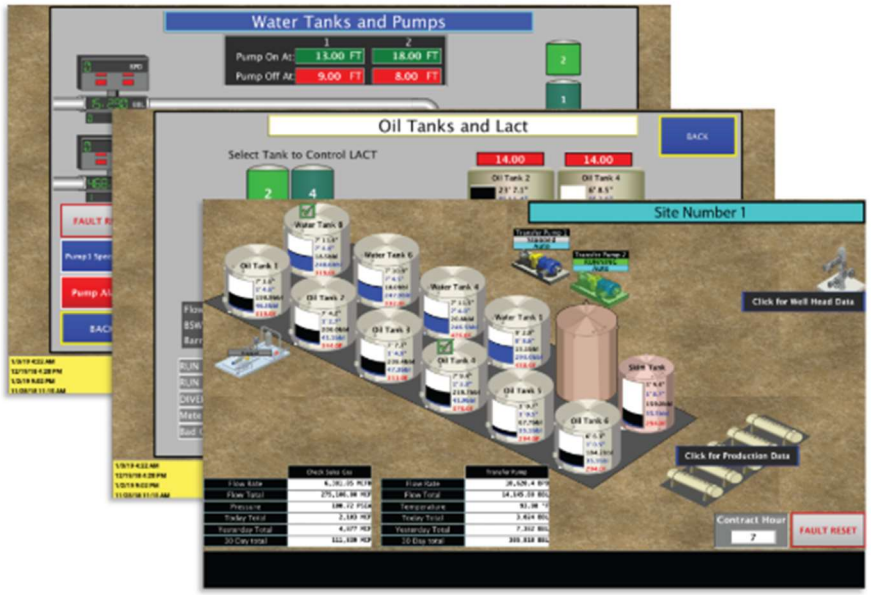
U.S. Patent No. 11,726,504	The TankLogix System
state of the first fluid-handling device; and	 Exhibit 2.  Exhibit 3. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,726,504	The TankLogix System
	source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.11] causing, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first fluid-handling device to a sequence of different target states that change over time.	The Accused System cause, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first fluid-handling device to a sequence of different target states that change over time. *See, e.g.*, portion of claim element 1.4 relating to remote control:  Exhibit 2. 

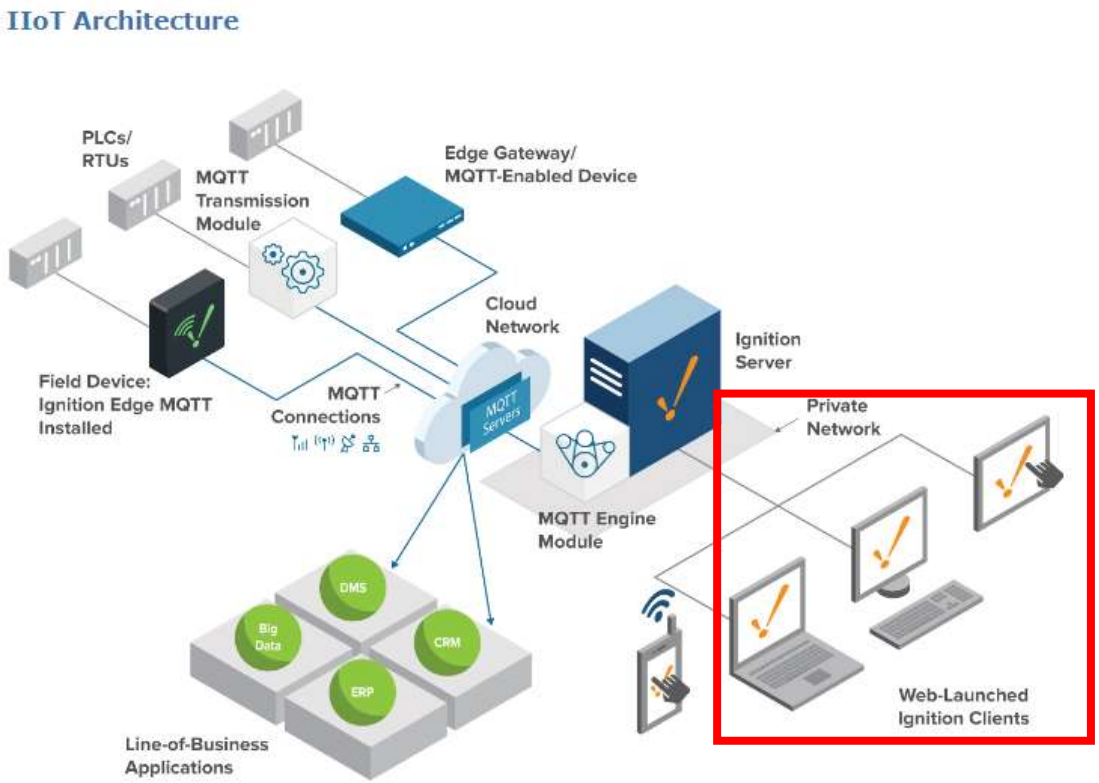
U.S. Patent No. 11,726,504	The TankLogix System
	Exhibit 3. On information and belief, the Accused System also includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 2	
[2] The system of claim 1, wherein: the sequence of different target states that change over time are configured to ramp up or down a speed of the first fluid-handling device.	In the Accused System, the sequence of different target states that change over time are configured to ramp up or down a speed of the first fluid-handling device. *See, e.g.*: *See* claim 1 above. TANKLOGIX VFD Motors Premium Efficiency (95% or higher) Control transfer pumps and circulating pumps by time, pressure, or tank level Clear faults and start/stop pumps online without having to go on site Steel and cast iron frames available Stock motors include a two year warranty Exhibit 3. On information and belief, the Accused System also includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time

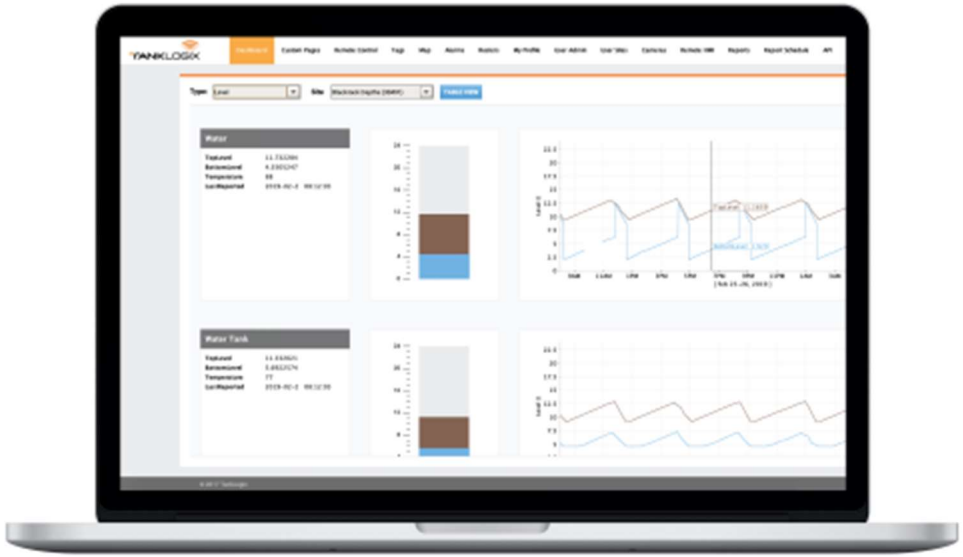
U.S. Patent No. 11,726,504	The TankLogix System
	See, e.g., claim element 1.11. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 3	
[3] The system of claim 1, wherein: the sequence of different target states that change over time are determined with steps for mitigating shocks to up-stream or down-stream fluid-handling devices relative to the first fluid-handling device.	In the Accused System, the sequence of different target states that change over time are determined with steps for mitigating shocks to up-stream or down-stream fluid-handling devices relative to the first fluid-handling device. *See, e.g.*: *See* claim 1 above. This claim element invokes 35 U.S.C. Section 112, para. 6. An example of corresponding structure is described at '504 Patent, 6:40-44, which states: "shocks to up-stream or down-stream fluid-handling devices may be mitigated by a series of commands gradually changing the state of a given fluid-handling device, for instance gradually ramping up or down the speed of a pump or gradually opening or closing a valve." TANKLOGIX VFD Motors Premium Efficiency (95% or higher) Control transfer pumps and circulating pumps by time, pressure, or tank level Clear faults and start/stop pumps online without having to go on site Steel and cast iron frames available Stock motors include a two year warranty

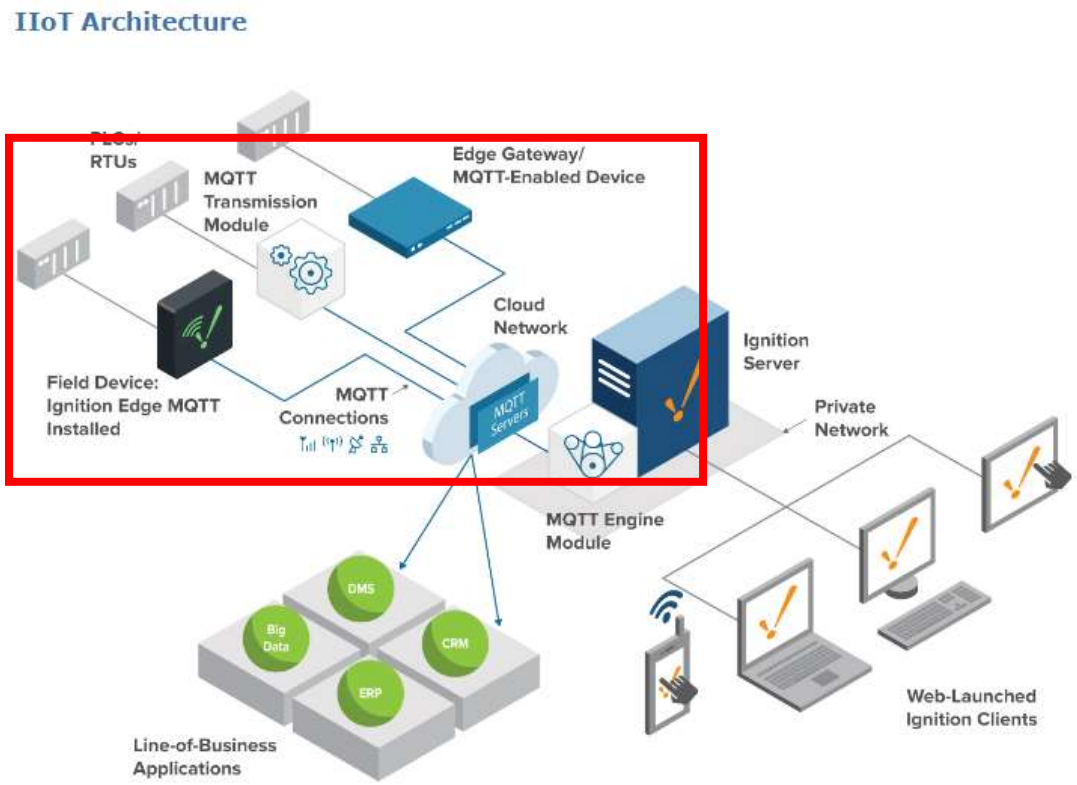
U.S. Patent No. 11,726,504	The TankLogix System
	Exhibit 3. On information and belief, the Accused System also includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 4	
[4] The system of claim 1, wherein: at least some of the sequence of different target states that change over time are determined by the first computer system in response to a rate of change in the first fluid property, wherein the first fluid property corresponds to a level of the first fluid in the first tank.	In the Accused System, at least some of the sequence of different target states that change over time are determined by the first computer system in response to a rate of change in the first fluid property in the first tank. *See, e.g.*: *See* claim 1 above. The Accused System includes tanks with valves controlled by PID controllers that change target states over time in response to a rate of change in the level of a fluid in the tank.

U.S. Patent No. 11,726,504	The TankLogix System
	TANKLOGIX VFD Motors Premium Efficiency (95% or higher) Control transfer pumps and circulating pumps by time, pressure, or tank level Clear faults and start/stop pumps online without having to go on site Steel and cast iron frames available Stock motors include a two year warranty Exhibit 3. On information and belief, the Accused System also includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time. 

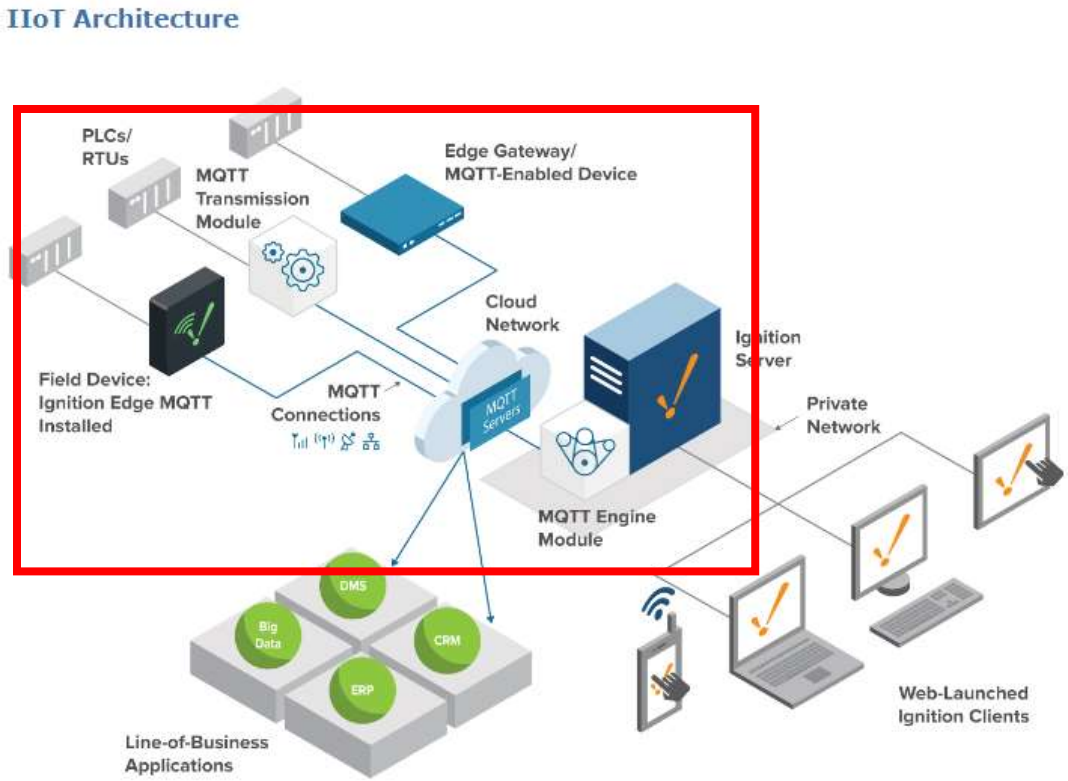
U.S. Patent No. 11,726,504	The TankLogix System
	Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 5	
[5] The system of claim 1, wherein: the server system is configured to interface with both a web browser on the client computing device and a special-purpose application executing on the client computing device to present the user interface indicating the first fluid property, wherein the first fluid property corresponds to a first fluid level.	In the Accused System, the server system is configured to interface with both a web browser on the client computing device and a special-purpose application executing on the client computing device to present the user interface indicating the first fluid property, wherein the first fluid property corresponds to a first fluid level. *See, e.g.*: *See also, e.g.*, claim 4. *See* claim 1 above.

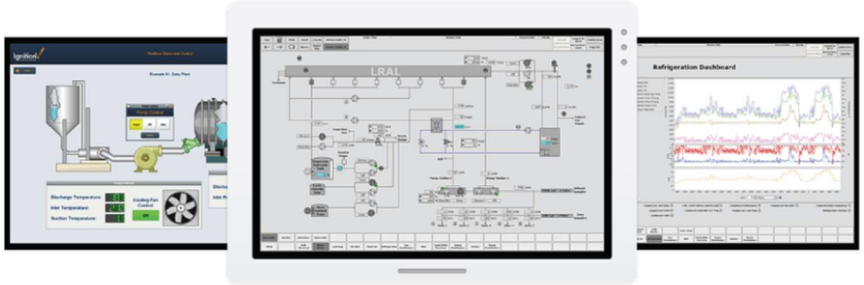
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 1.

U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2. Moreover, Inductive Automation's website states "the applications you build in Perspective will look beautiful, and run natively on your device or in any major browser." Exhibit 4 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 6	

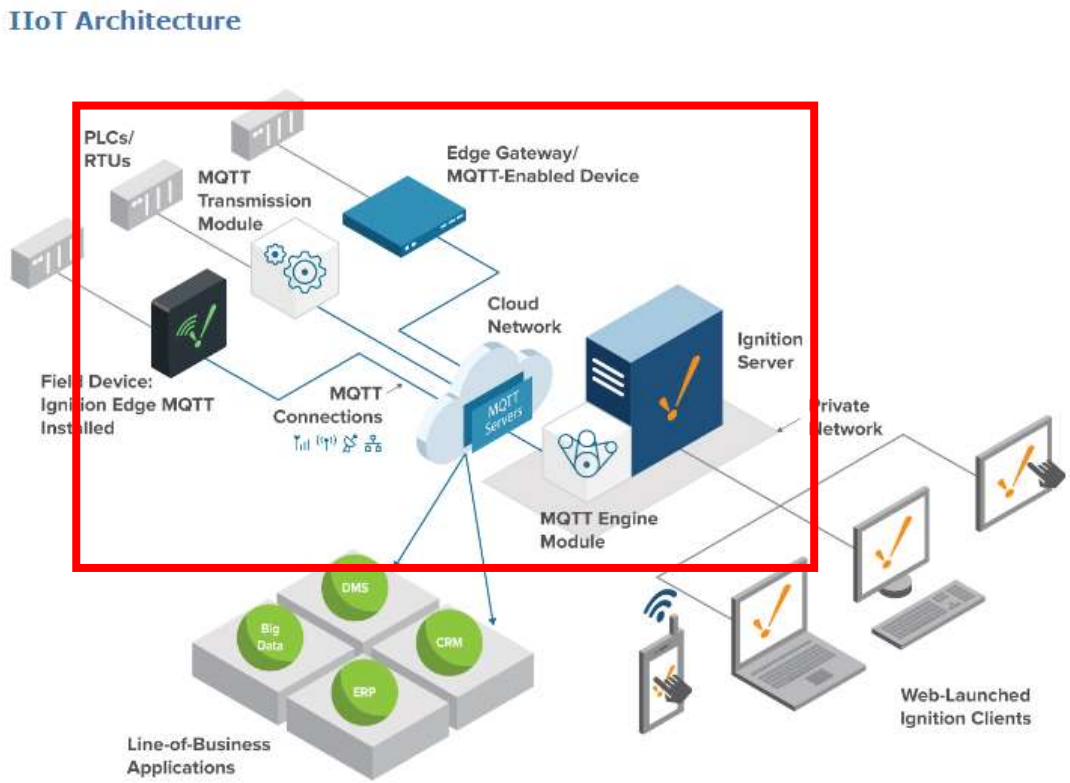
U.S. Patent No. 11,726,504	The TankLogix System
[6] The system of claim 1, wherein: the first computer system is configured to communicate with the server system via a cellular wireless connection.	In the Accused System, the first computer system is configured to communicate with the server system via a cellular wireless connection. *See, e.g.*: *See* claim 1 above.  Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

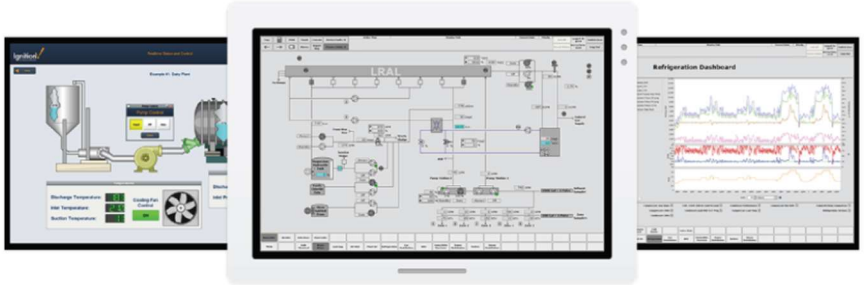
U.S. Patent No. 11,726,504	The TankLogix System
	source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 7	
[7] The system of claim 1, wherein the first computer system is configured to translate a plurality of commands from the server system, including the command, from an input format to a plurality of different formats and protocols configured to effectuate changes in states of a plurality of different fluid-handling devices at the first fluid handling site.	In the Accused System, the first computer system is configured to translate a plurality of commands from the server system, including the command, from an input format to a plurality of different formats and protocols configured to effectuate changes in states of a plurality of different fluid-handling devices at the first fluid handling site. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 1.

U.S. Patent No. 11,726,504	The TankLogix System
	Web-based HMI and SCADA applications deployment Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way. Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See and manage your entire system from one place.  Exhibit 8 The MQTT.org website explains that "MQTT allows for messaging between device to cloud and cloud to device." Exhibit 5 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 8	

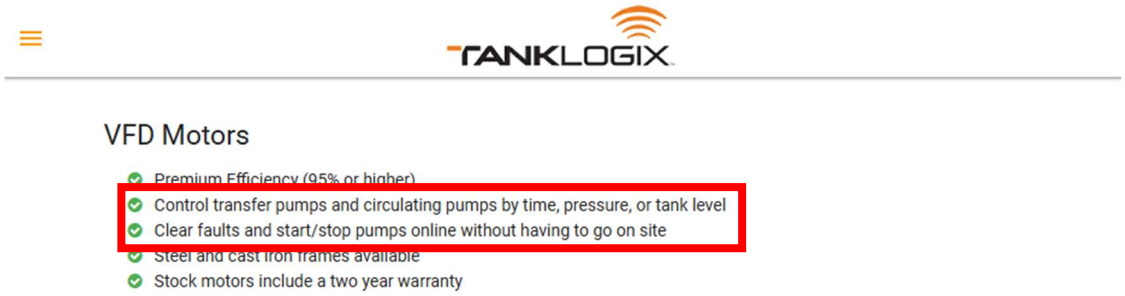
U.S. Patent No. 11,726,504	The TankLogix System
[8] The system of claim 7, wherein translating the plurality of commands comprises steps for translating commands.	In the Accused System, translating the plurality of commands comprises steps for translating commands. *See, e.g.*: *See* claim 7 above. This claim element invokes 35 U.S.C. Section 112, para. 6. An example of corresponding structure includes the following at 9:57-63 of the ’504 Patent: “In one example of translation, the command translator 80 may receive a command to increase a pump speed, and the command translator may determine a corresponding command via calculation or look-up table, such as a modbus function code and associated data, that when conveyed via the control bus 66 causes a corresponding fluid-handling device 40 or 42 to change state.”

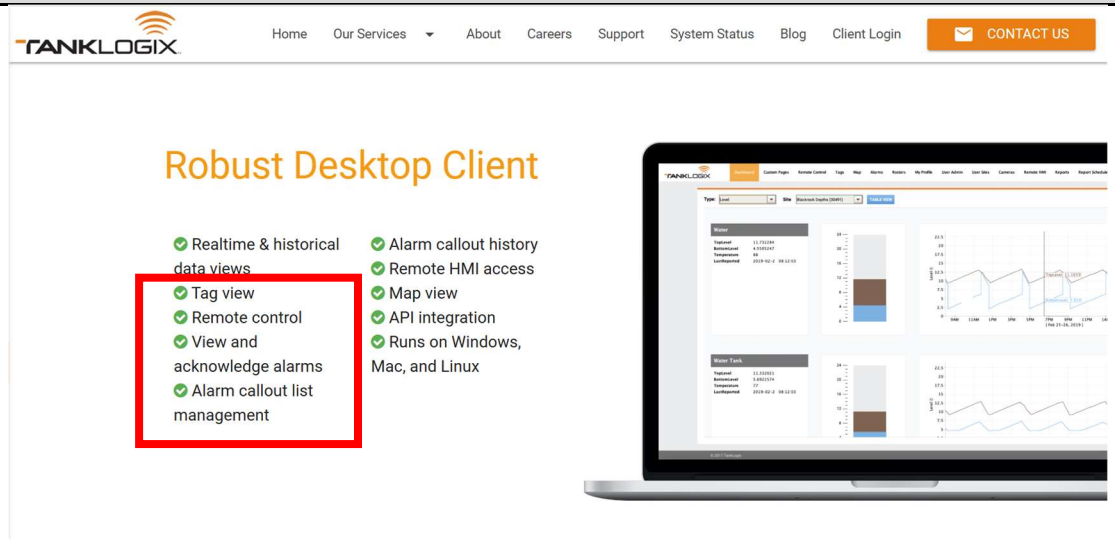
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 1.

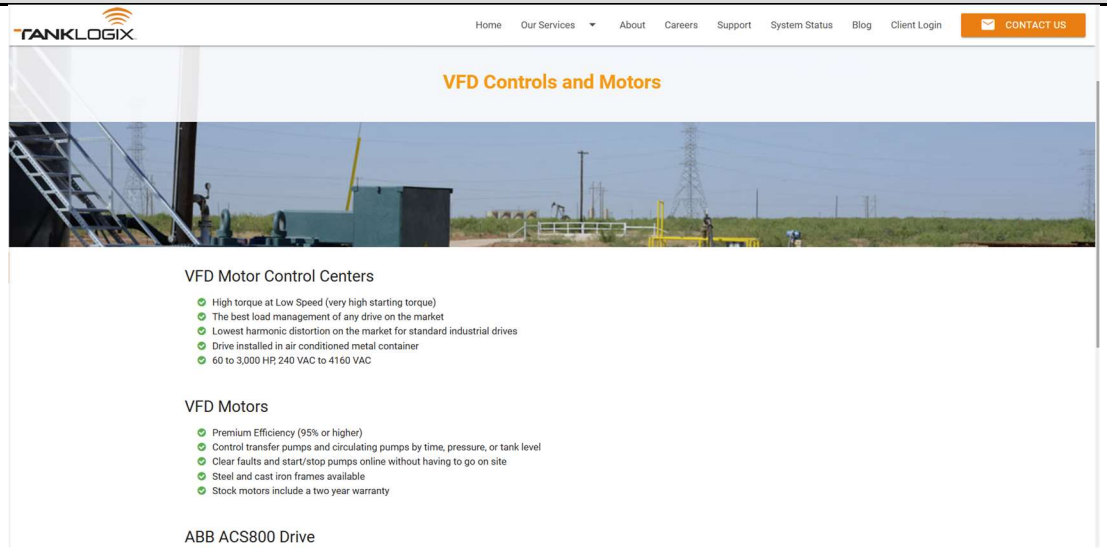
U.S. Patent No. 11,726,504	The TankLogix System
	Web-based HMI and SCADA applications deployment Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way. Create runtime clients and sessions that show current or past data, interact with your other systems and devices, create displays and controls for anything wired into your system. See and manage your entire system from one place.  Exhibit 8 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 9	
[9] The system of claim 7, wherein the plurality of different formats and protocols comprise: modbus remote	In the Accused System, the plurality of different formats and protocols comprise: modbus remote terminal unit protocol; and analog electrical signals. *See, e.g.*:

U.S. Patent No. 11,726,504	The TankLogix System
terminal unit protocol; and analog electrical signals.	*See* claim 7 above. The Accused System is configured to communicate with devices via a serial bus via a protocol such as Modbus. *See, e.g.*, Exhibit 6. On information and belief, the PLCs in the Accused System are further configured to communicate with fluid-handling devices via a variety of other protocols, including analog electrical signals. The Accused System therefore necessarily must select the appropriate protocol for the fluid-handling device to receive the translated command. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 10	
[10] The system of claim 7, wherein at least some of the plurality of different fluid-handling devices comprise proportional-integral-derivative controllers configured to drive respective fluid-handing devices to different target setpoints determined by the first computer system responsive to corresponding commands from the server system.	In the Accused System, at least some of the plurality of different fluid-handling devices comprise proportional-integral-derivative controllers configured to drive respective fluid-handing devices to different target setpoints determined by the first computer system responsive to corresponding commands from the server system. *See, e.g.*: TANKLOGIX VFD Motors Premium Efficiency (95% or higher) Control transfer pumps and circulating pumps by time, pressure, or tank level Clear faults and start/stop pumps online without having to go on site Steel and cast iron frames available Stock motors include a two year warranty Exhibit 3.

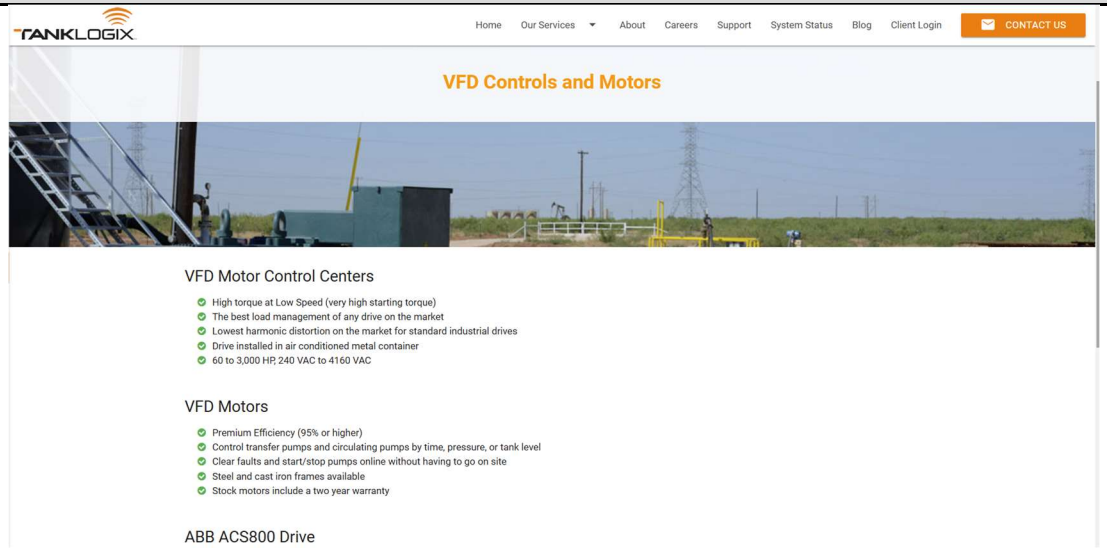
U.S. Patent No. 11,726,504	The TankLogix System
	On information and belief, the Accused System also includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 11	
[11.1] The system of claim 7, wherein: the first computer system is coupled to at least some of the plurality of different fluid-handling devices via a bus; and	In the Accused System, the first computer system is coupled to at least some of the plurality of different fluid handing devices via a bus. *See, e.g.*: *See* claim 7 above. The Accused System is configured to communicate with devices via a serial bus via a protocol such as Modbus. See, e.g., Exhibit 6. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[11.2] the first computer system comprises means for controlling which fluid handling devices are permitted to	In the Accused System, the first computer system comprises means for controlling which fluid handling devices are permitted to transmit signals on the bus at a given point in time. *See, e.g.*: This claim element invokes 35 U.S.C. Section 112, para. 6.

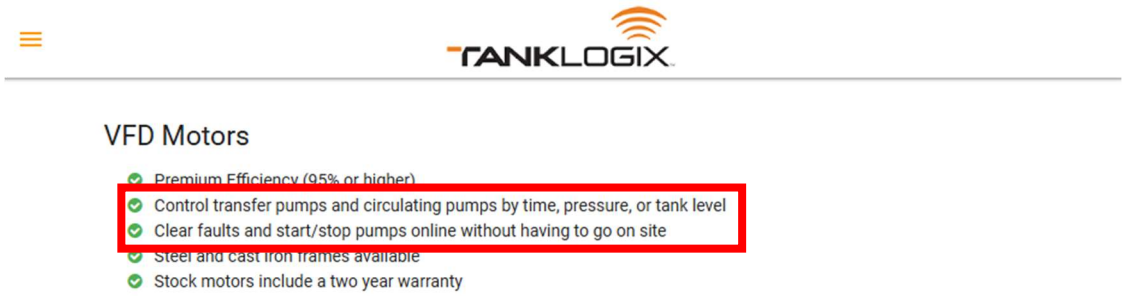
U.S. Patent No. 11,726,504	The TankLogix System
transmit signals on the bus at a given point in time.	An example of corresponding structure can be found at 6:66-7:18, which states: In one particular implementation, intended to serve merely as an example, the control bus 66 conveys commands and data using a serial communication protocol, such as the Modbus remote terminal unit (RTU) protocol, in which commands and other data are encoded in binary signals packaged in frames having redundant bits for detecting errors. … In some examples, site master-controller 18 acts as a master device on the bus 66, controlling which devices are permitted to transmit signals on the bus 66 at a given point in time. In this example, the fluid-handling devices 42 and 40 may include a bus interface that detects when a command is addressed to the respective fluid-handling device and stores the command for further processing, for example by a local controller 58 that implements the command. The Accused System implements the same function in a substantially similar way to a substantially similar result.  Exhibit 3.

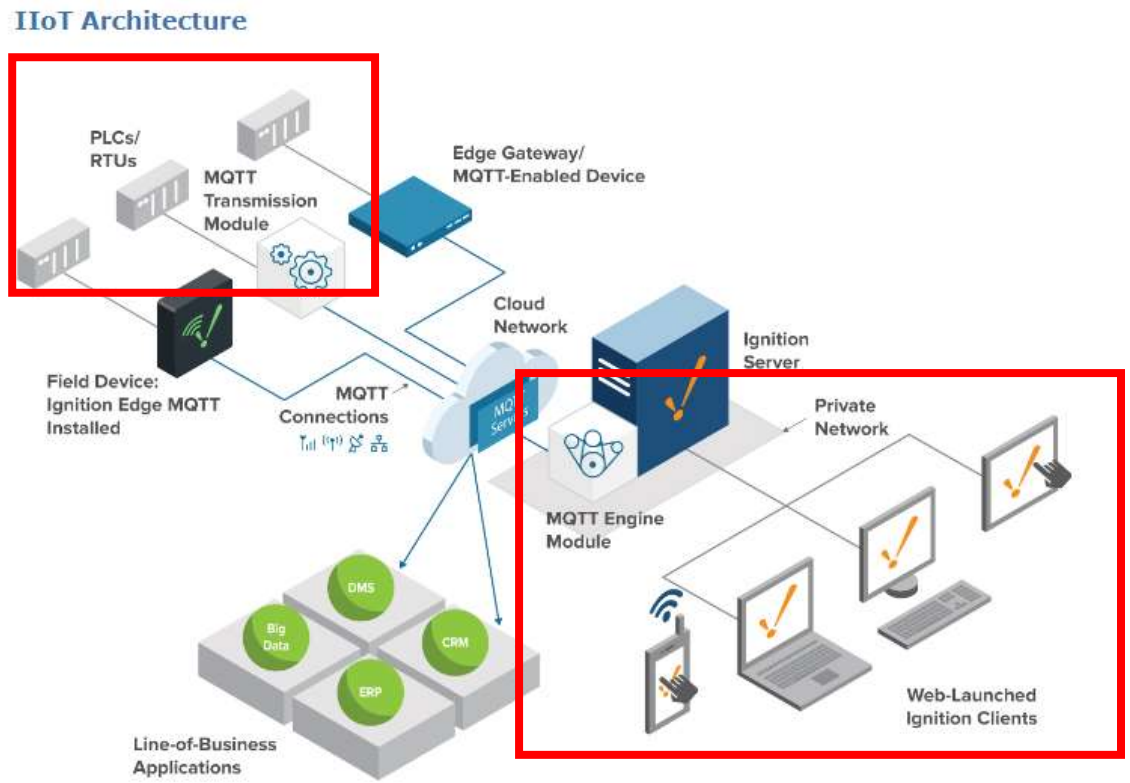
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 12	
[12] The system of claim 7, wherein the plurality of different formats and protocols comprise three different protocols communicated over three different types of control busses to corresponding fluid handling devices	The Accused System uses at least three different protocols over three different types of control busses to corresponding fluid handling devices among the plurality of different fluid handing devices: *See, e.g.*: *See* claim 7 above.

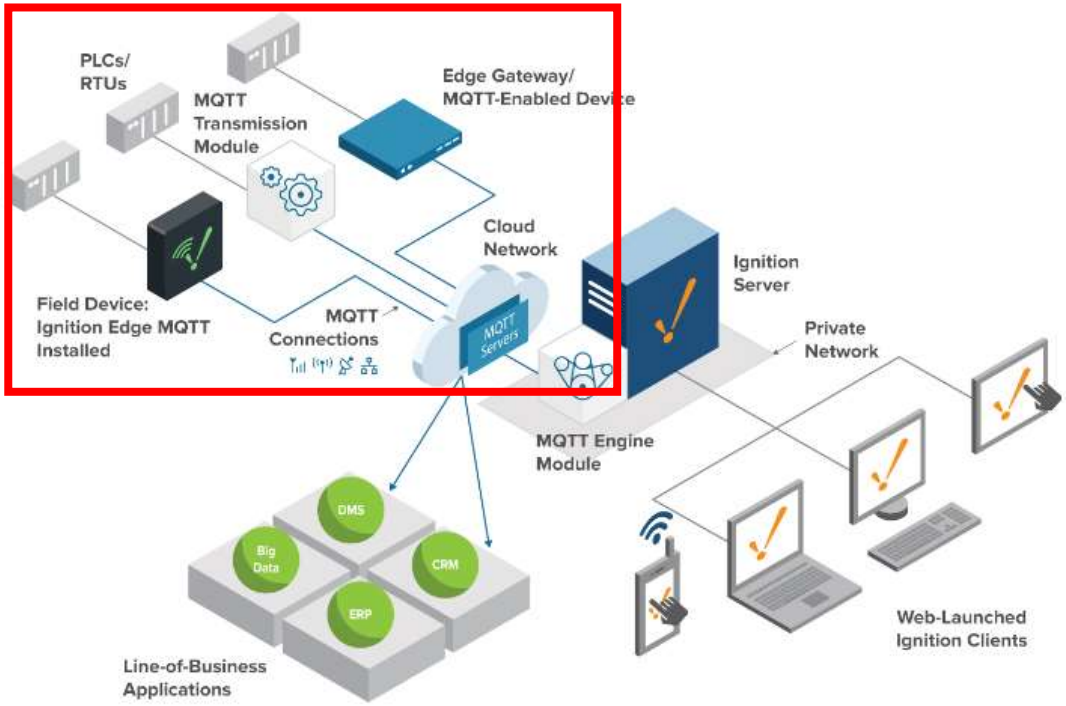
U.S. Patent No. 11,726,504	The TankLogix System
among the plurality of different fluid-handling devices.	 Exhibit 3. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs, ethernet signals over a network bus, and Modbus signals over a Modbus serial bus, each understood by the various fluid-handling devices. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 13	

U.S. Patent No. 11,726,504	The TankLogix System
[13] The system of claim 7, wherein the plurality of different formats and protocols comprise command code format, an on-off signal format, and an application-program interface format.	In the Accused System, the plurality of different formats and protocols comprise command code format, an on-off signal format, and an application-program interface format. *See, e.g.*: *See* claim 7 above. VFD Motors Premium Efficiency (95% or higher) Control transfer pumps and circulating pumps by time, pressure, or tank level Clear faults and start/stop pumps online without having to go on site Steel and cast iron frames available Stock motors include a two year warranty Exhibit 3.

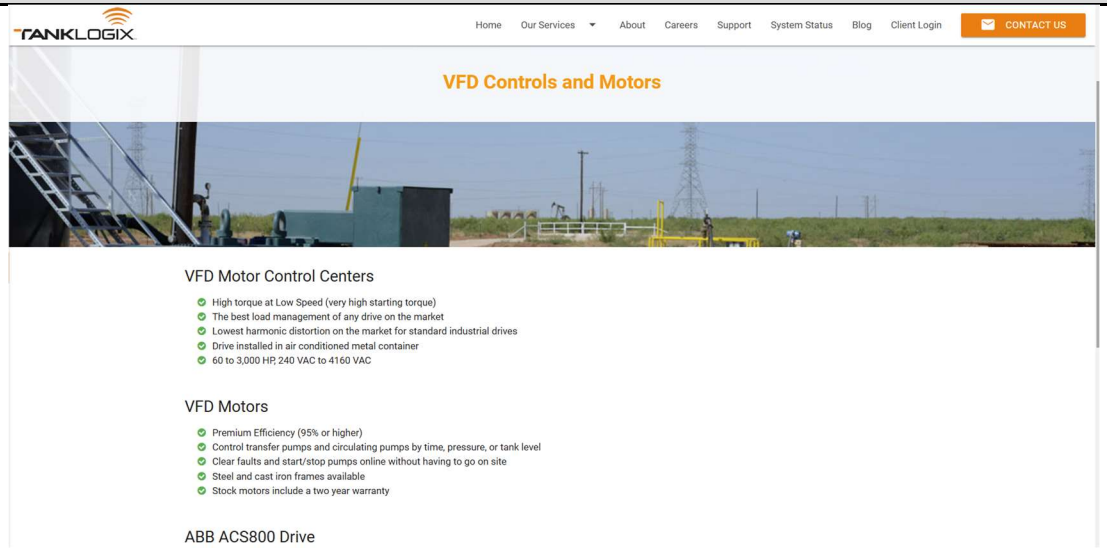
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 3. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols in various formats, such as a command code format, an on-off signal format, and an application-program interface format. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 14	
[14] The system of claim 7, wherein the first computer system is configurable to operate in an automatic mode, a	In the Accused System, the first computer system is configurable to operate in an automatic mode, a mixed automatic mode, and a manual mode. *See, e.g.*:

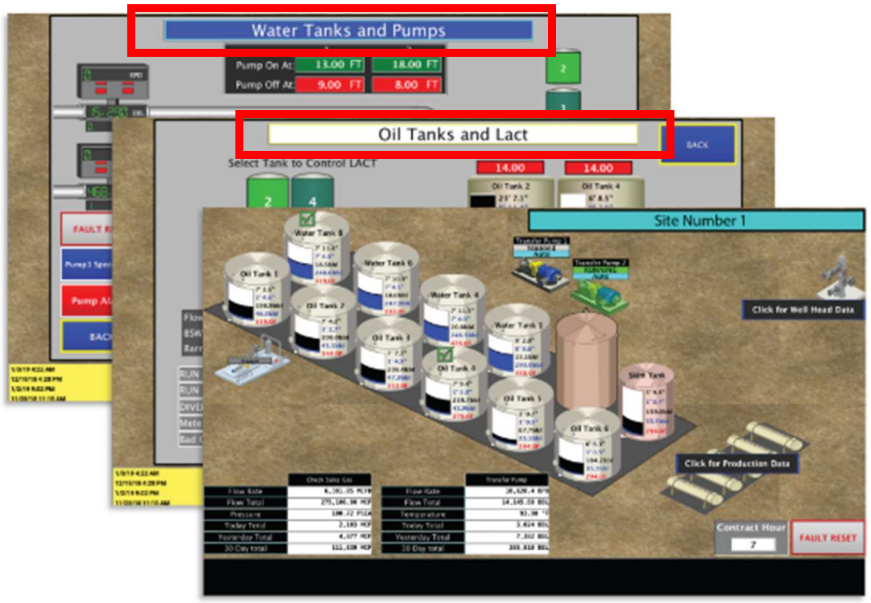
U.S. Patent No. 11,726,504	The TankLogix System
mixed automatic mode, and a manual mode.	*See* claim 7 above.  Exhibit 3. On information and belief, the first computer system is configured to operate in an automatic mode. For example, the first computer system effectuates a command by automatically changing a state of a pump to a sequence of different target states that change over time. The VFD undergoes a "soft start" to ramp up the speed of the pump, during which the target state of the pump gradually changes over time from an initial state to a final state. On information and belief, the first computer system is configured to operate in a mixed automatic mode. For example, the first computer system receives commands from the mobile device in the schematic below, and then automatically executes the commands:

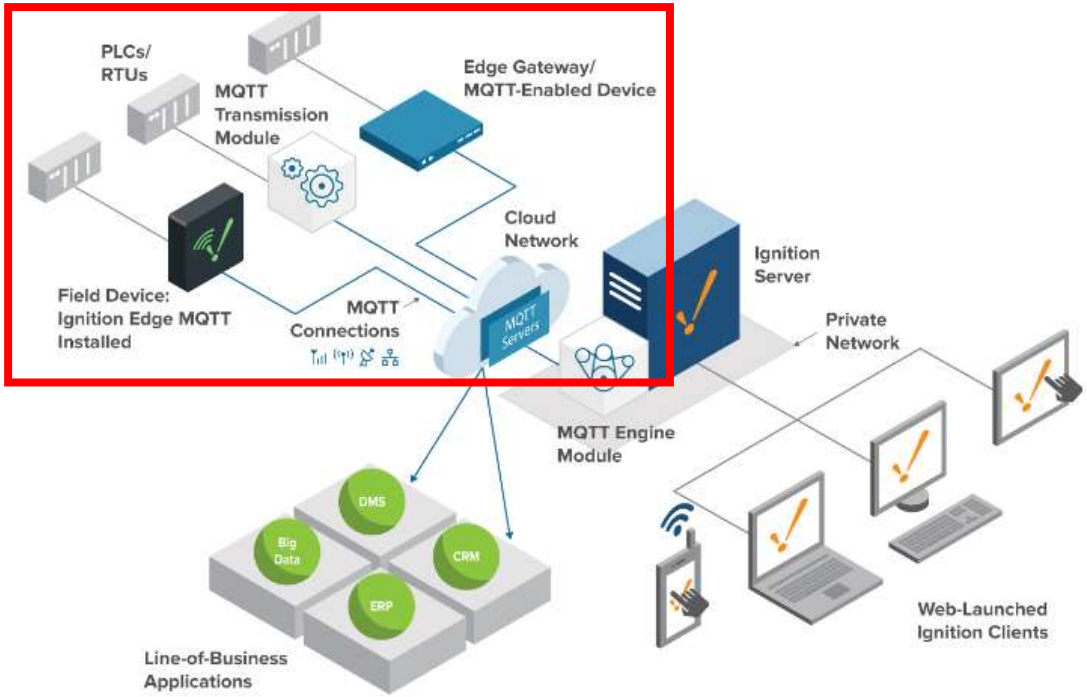
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.

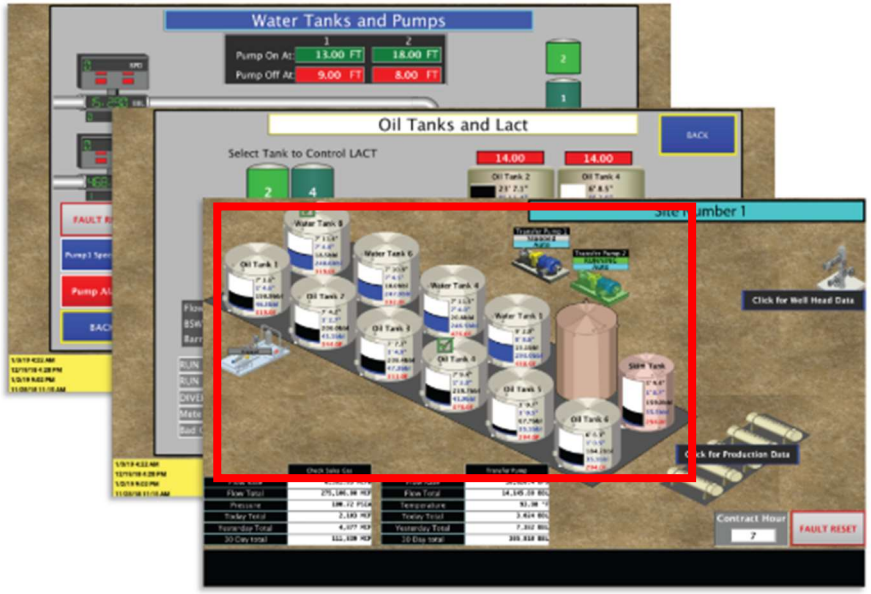
U.S. Patent No. 11,726,504	The TankLogix System
Claim 15	
[15] The system of claim 7, wherein translating the plurality of commands comprises steps for identifying protocols and control busses.	In the Accused System, translating the plurality of commands comprises steps for identifying protocols and control busses. *See, e.g.*: *See* claim 7 above. The Accused System is configured to send the command to the network address of the controller (*see, e.g.,* claim element 1.6) by identifying a protocol of the fluid-handling device. The commands, e.g., in Ethernet and modbus, each entails a respective format and protocol that is identified. IIoT Architecture 

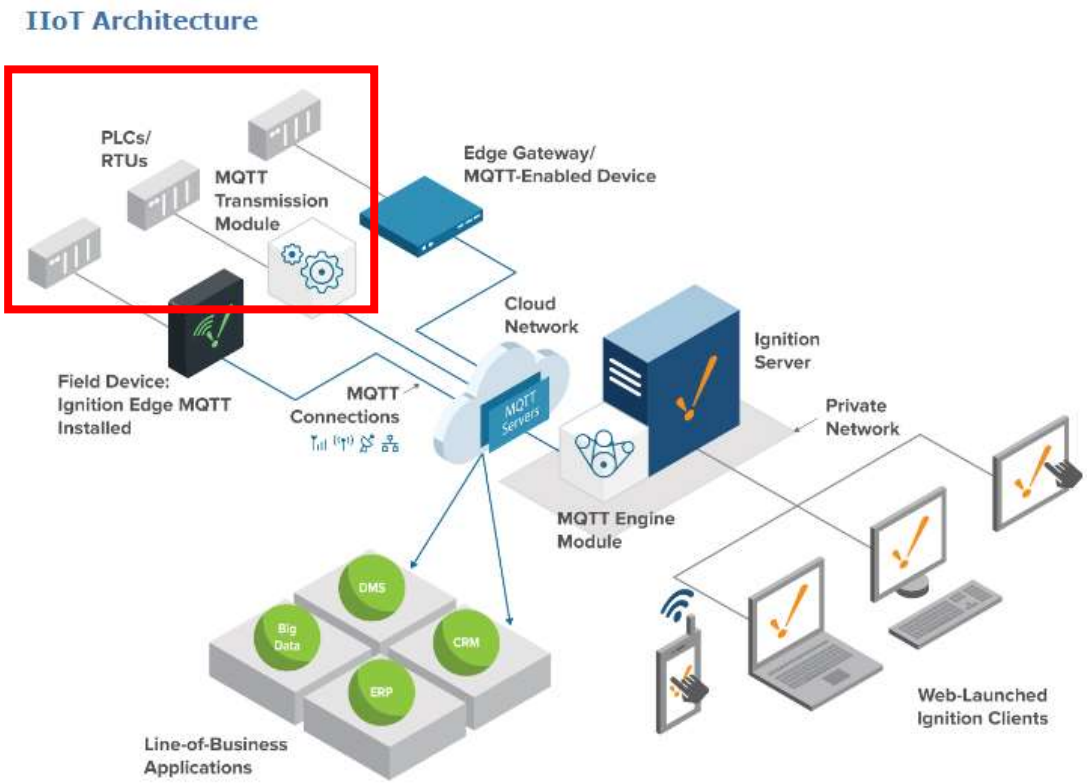
U.S. Patent No. 11,726,504	The TankLogix System
	Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 16	
[16] The system of claim 1 wherein the first computing system is configured to receive and transmit data and commands via a remote terminal unit protocol wherein the data and commands comprise redundant bits.	In the Accused System, the first computing system is configured to receive and transmit data and commands via a remote terminal unit protocol wherein the data and commands comprise redundant bits. *See, e.g.*: *See* claim 1 above. *See also, e.g.*, claim 12.

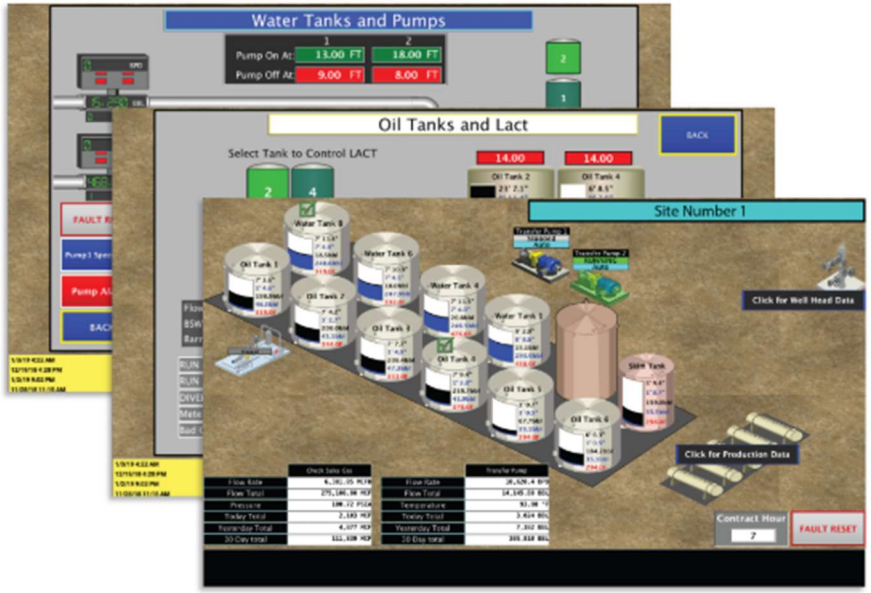
U.S. Patent No. 11,726,504	The TankLogix System
	 Exhibit 3. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as binary frames with redundant bits used to detect errors. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.

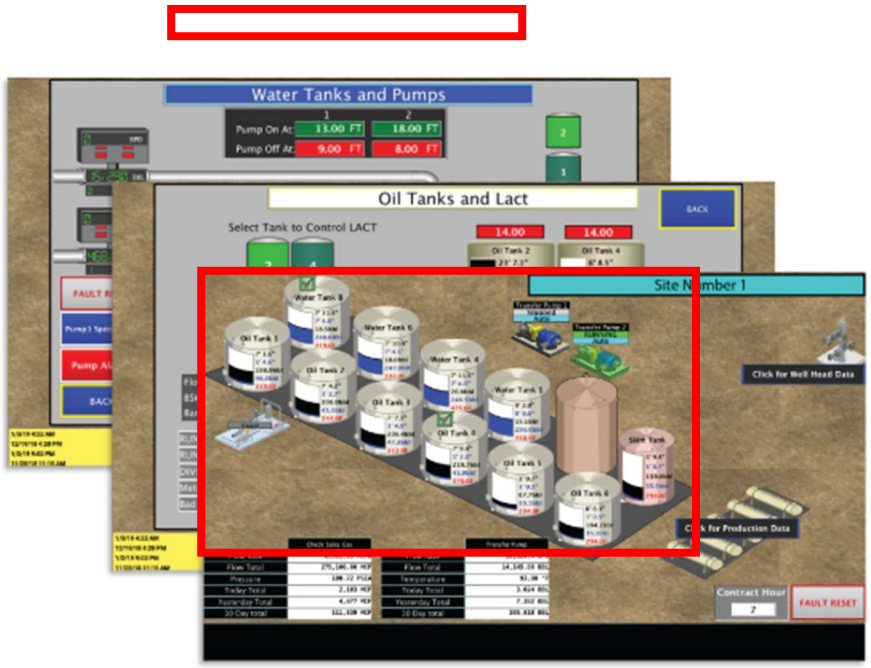
U.S. Patent No. 11,726,504	The TankLogix System
Claim 17	
[17.1] The system of claim 1, wherein the system further comprises: a plurality of fluids, the plurality of fluids comprising a second fluid;	In the Accused System, the system further comprises: a plurality of fluids, the plurality of fluids comprising a second fluid. *See, e.g.*: *See* claim 1 above.  Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.

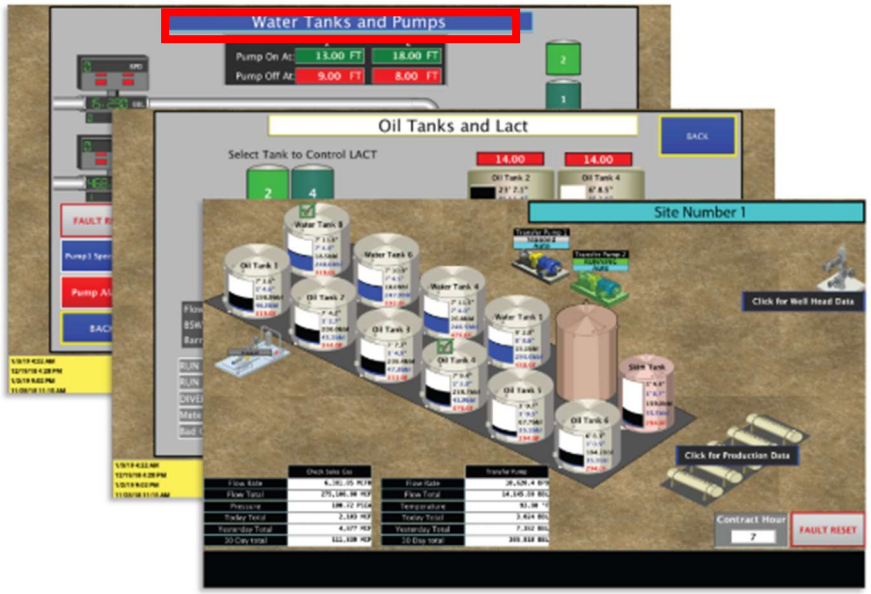
U.S. Patent No. 11,726,504	The TankLogix System
[17.2] a plurality of computer systems disposed at a plurality of fluid-handling sites, the plurality of computer systems comprising a second computer system;	The Accused System includes a plurality of computer systems disposed at a plurality of fluid-handling sites, the plurality of computer systems comprising a second computer system. *See, e.g.*: IIoT Architecture  Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,726,504	The TankLogix System
	source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[17.3] a plurality of fluid tanks, the plurality of fluid tanks comprising a second fluid tank; and	The Accused System comprises a plurality of fluid tanks, the plurality of fluid tanks comprising a second fluid tank. *See, e.g.*:  Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

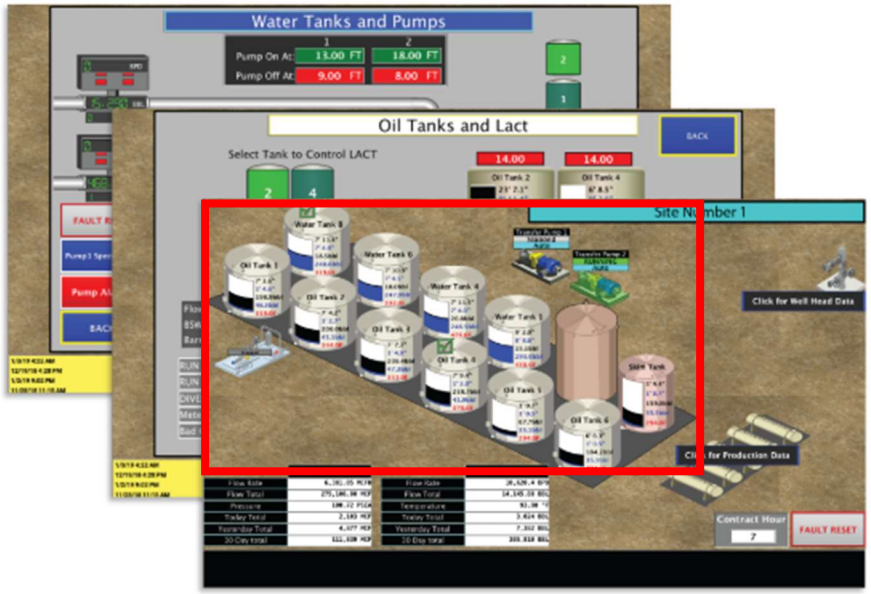
U.S. Patent No. 11,726,504	The TankLogix System
	source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[17.4] a plurality of fluid-handling devices, the plurality of fluid-handling devices comprising a second fluid-handling device.	The Accused System comprises a plurality of fluid-handling devices, the plurality of fluid-handling devices comprising a second fluid-handling device. *See, e.g.*: m. *See, e.g.*:  Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a

U.S. Patent No. 11,726,504	The TankLogix System
	manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 18	
[18.1] The system of claim 17, wherein: the first computer system, the first fluid-handling device and the first fluid tank are disposed at a water source;	In the Accused System, the first computer system, the first fluid-handling device and the first fluid tank are disposed at a water source. *See, e.g.*: *See* claim 17 above.  Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a

U.S. Patent No. 11,726,504	The TankLogix System
	manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[18.2] the second computer system, the second fluid-handling device, and the second fluid tank are disposed at a water receptacle; and	In the Accused System, the second computer system, the second fluid-handling device, and the second fluid tank are disposed at a water receptacle. *See, e.g.*:  Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 11,726,504	The TankLogix System
	insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[18.3] each of the first fluid and the second fluid comprises water.	*See, e.g.*, claim element 18.1 and 18.2.  Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,726,504	The TankLogix System
	source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 19	
[19.1] The system of claim 18, wherein: the plurality of fluids further comprising a third fluid;	In the Accused System, the plurality of fluids further comprises a third fluid. *See, e.g.*, claim element 17.1. *See* claim 18 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[19.2] the plurality of computer systems further comprises a third computer system; and	In the Accused System, the plurality of computer systems further comprises a third computer system. *See, e.g.*: *See, e.g.*, claim element 17.2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[19.3] the plurality of fluid-handling devices further comprises a third fluid-handling device comprising a process	In the Accused System, the plurality of fluid-handling devices further comprises a third fluid-handling device comprising a process filter, wherein the third fluid-handling device is disposed down-stream of a fourth fluid-handling device and up-stream of a

U.S. Patent No. 11,726,504	The TankLogix System
filter, wherein the third fluid-handling device is disposed down-stream of a fourth fluid-handling device and up-stream of a fifth fluid handling device, receives from the fourth fluid-handling device the third-fluid, and is configurable to provide a fourth fluid to the fifth fluid-handling device.	fifth fluid handling device, receives from the fourth fluid-handling device the third-fluid, and is configurable to provide a fourth fluid to the fifth fluid-handling device. *See, e.g.*:  Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available..
Claim 20	

U.S. Patent No. 11,726,504	The TankLogix System
[20.1] A tangible, non-transitory, machine-readable medium storing instructions that, when executed by a computer processor, effectuate operations comprising:	The Accused System comprises a tangible, non-transitory, machine-readable medium storing instructions that, when executed by a computer processor, effectuate operations. *See, e.g.*, claim element 1.1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.2] measuring, with one or more sensors at a first fluid tank located at a first-fluid handling site, one or more properties associated with a first fluid;	The Accused System measures, with one or more sensors at a first fluid tank located at a first-fluid handling site, one or more properties associated with a first fluid. *See, e.g.*, claim element 1.2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.3] receiving, with a first computer system disposed at a first fluid handling site, information associated with the one or more properties associated with the first fluid;	The Accused System receives, with a first computer system disposed at a first fluid handling site, information associated with the one or more properties associated with the first fluid. *See, e.g.*, claim element 1.2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 11,726,504	The TankLogix System
	insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.4] providing, with the first computer system, remote control of a first fluid-handling device of a plurality of fluid-handling devices, the first fluid-handling device comprising at least one of a first pump, a first filter, and a first valve;	The Accused System provides, with the first computer system, remote control of a first fluid-handling device of a plurality of fluid-handling devices, the first fluid-handling device comprising at least one of a first pump, a first filter, and a first valve. *See, e.g.*, claim elements 1.3 and 1.4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.5] receiving, with a server system, from the first computer system, via a network, a first fluid property of the one or more properties associated with the first fluid sensed by a first sensor of the one or more sensors;	The Accused System receives, with a server system, from the first computer system, via a network, a first fluid property of the one or more properties associated with the first fluid sensed by a first sensor of the one or more sensors. *See, e.g.*, claim element 1.5 and 1.6. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.

U.S. Patent No. 11,726,504	The TankLogix System
[20.6] obtaining, with the server system, credentials from a first client computing device;	The Accused System obtaines, with the server system, credentials from a first client computing device. *See, e.g.*, claim element 1.7. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.7] determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact;	The Accused System determines, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact. *See, e.g.*, claim element 1.8. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.8] after the determination, providing, with the server system, via the network, information by which a first client computing device presents a	The Accused System, after the determination, provides, with the server system, via the network, information by which a first client computing device presents a user interface indicating the first fluid property, the first client computing device being remote from the server system and the first computer system.

U.S. Patent No. 11,726,504	The TankLogix System
user interface indicating the first fluid property, the first client computing device being remote from the server system and the first computer system;	*See, e.g.*, claim element 1.9. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.9] receiving, with the server system, from the first client computing device, a first command to change a state of the first fluid-handling device; and	The Accused System receives, with the server system, from the first client computing device, a first command to change a state of the first fluid-handling device. *See, e.g.*, claim element 1.10. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.
[20.10] causing, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first fluid-handling device to a sequence of different target states that change over time.	The Accused System causes, with the server system, the first computer system disposed at the first fluid handling site to effectuate the command by changing the state of the first fluid-handling device to a sequence of different target states that change over time. *See, e.g.*, claim element 1.11. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 11,726,504	The TankLogix System
	source code as not yet been made available, SitePro reserves the right to amend this analysis as additional information becomes available.