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-00643-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. 9,342,078 (the "'078 Patent"), 10,488,871 (the "'871 Patent"), 11,294,403 (the "'403 Patent"), and 12,019,461 (the "'461 Patent") (collectively, 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 on-going, 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.

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:

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- **’078 Patent**: claims 1-9, 11-13, 15-19;
- **’871 Patent**: claims 18-34;
- **’403 Patent**: claims 1-30; and
- **’461 Patent:** claims 1-17.

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.

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.

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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 ’078 Patent is entitled to a priority date at least as early as February 2012.
- Each asserted claim of the ’871 Patent is entitled to a priority date at least as early as February 2012.
- Each asserted claim of the ’403 Patent is entitled to a priority date at least as early as February 2012.
- Each asserted claim of the ’461 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,

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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 the 11th day of April, 2025, upon the Defendants' counsel of record.

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

Exhibit A

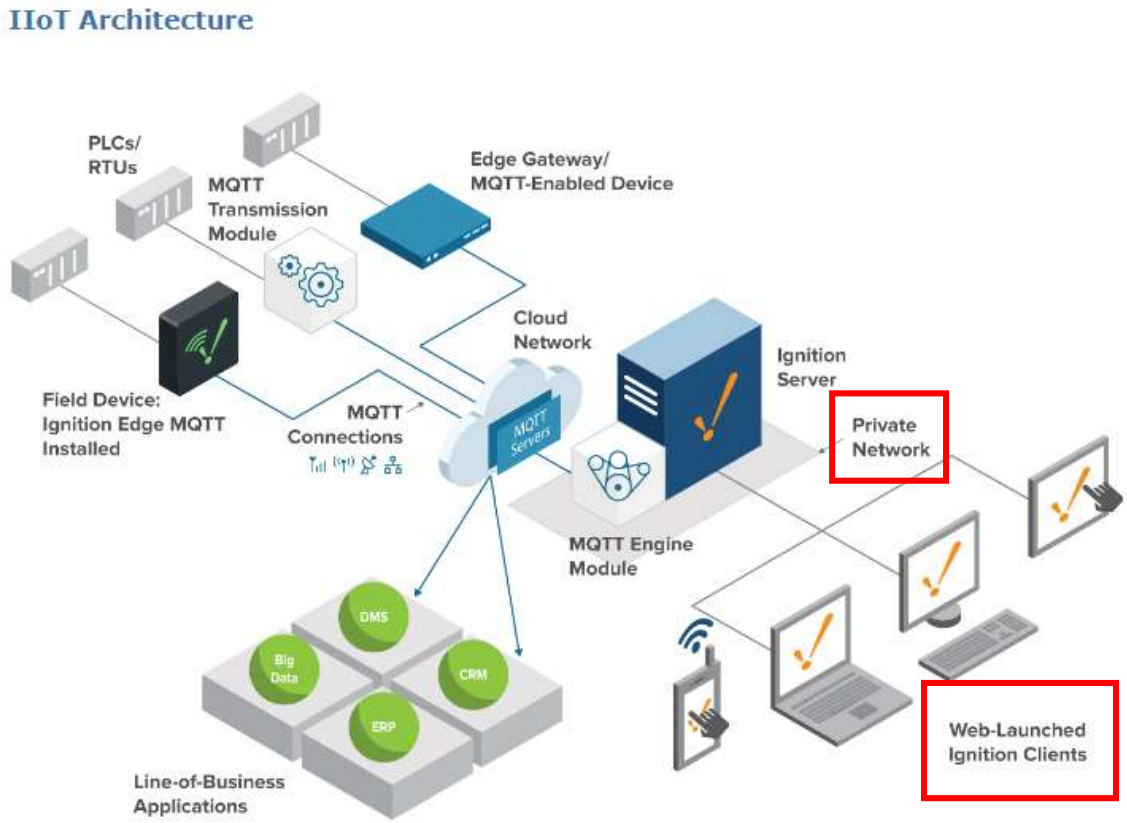
Infringement Analysis of U.S. Patent No. 9,342,078 Against the OnPing System Implemented by Defendants

Pursuant to this Court's Order Governing Proceedings in Patent Cases, this chart sets forth where in the Accused System each element of claims 1-9, 10-13, and 15-19 of U.S. Patent No. 9,342,078 (the "'078 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed and implemented by TankLogix, LLC.

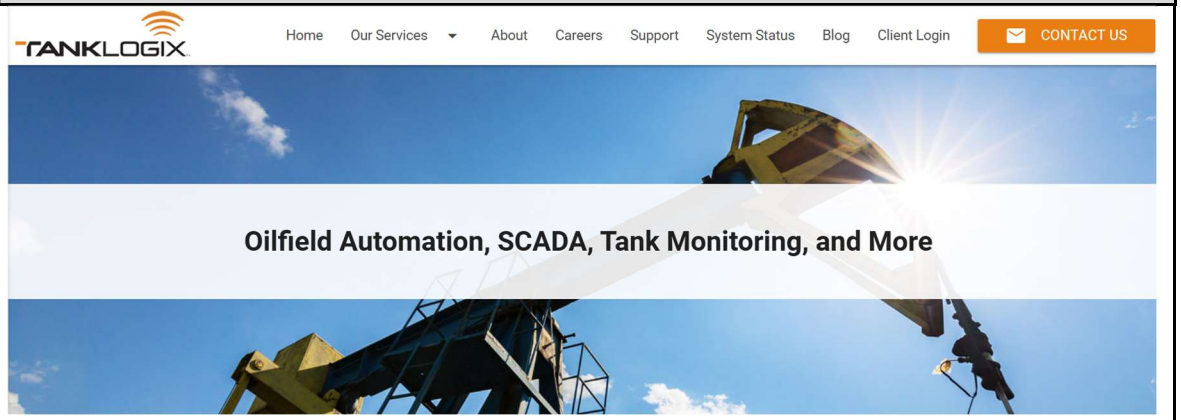
References Cited:

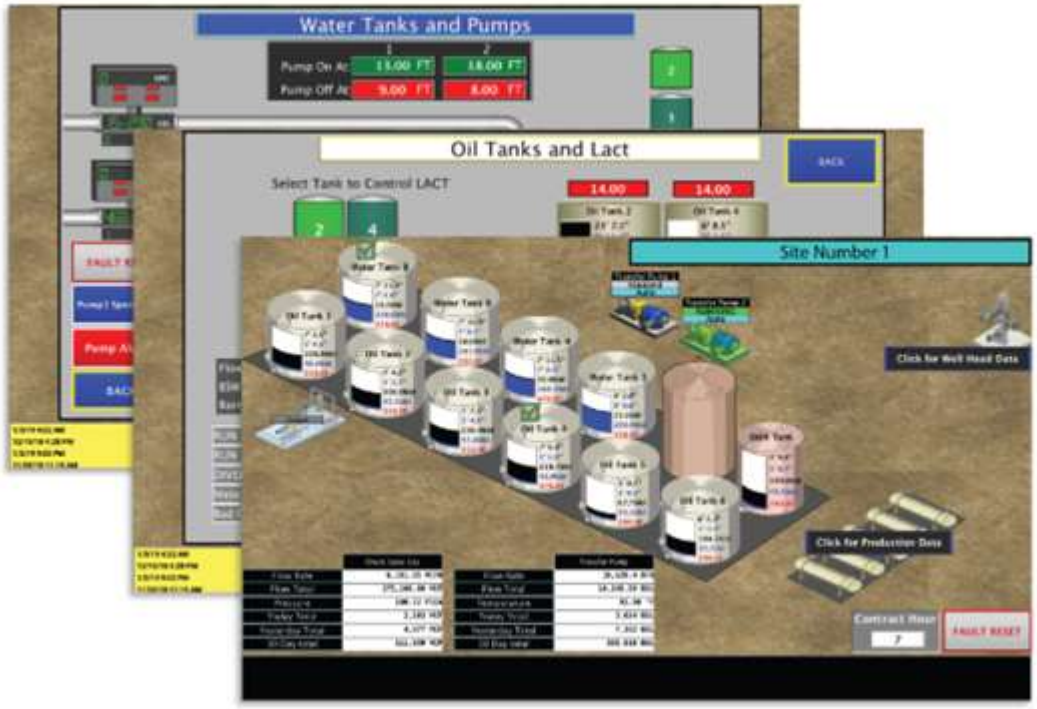
- Exhibit 1, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 2, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 3, https://tanklogix.com/vfd-controls-and-motors/.
- Exhibit 4, https://www.tanklogix.com/.
- Exhibit 5, https://www.docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge.
- Exhibit 6, https://www.docs.inductiveautomation.com/docs/8.1/platform/tags/user-defined-types-udts/udt-multi-instance-wizard.

U.S. Patent No. 9,342,078	The Accused System
Claim 1	
[1.1] A method, comprising:	To the extent the preamble is found limiting, the Accused System performs a method as claimed. *See, e.g.*: 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 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.
[1.2] receiving, via a network interface, a plurality of user-directed instructions to control fluid-handling devices that monitor or control one or more fluids at an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station, the plurality of instructions being received encoded in a shared protocol;	The Accused System receives, via a network interface, a plurality of user-directed instructions to control fluid-handling devices that monitor or control one or more fluids at an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station, the plurality of instructions being received encoded in a shared protocol. *See, e.g.*:

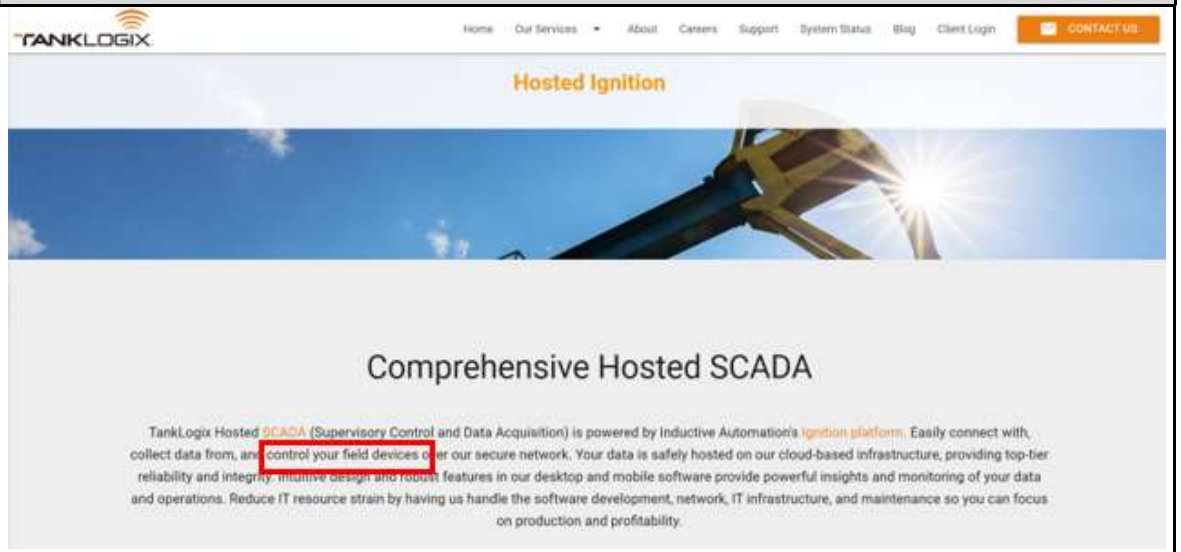
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 2 (annotated).

U.S. Patent No. 9,342,078	The Accused System
	TANKLOGIX Home Our Services About Careers Support System Status Blog Client Login CONTACT US Hosted Ignition 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 1 (annotated). 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 (annotated).

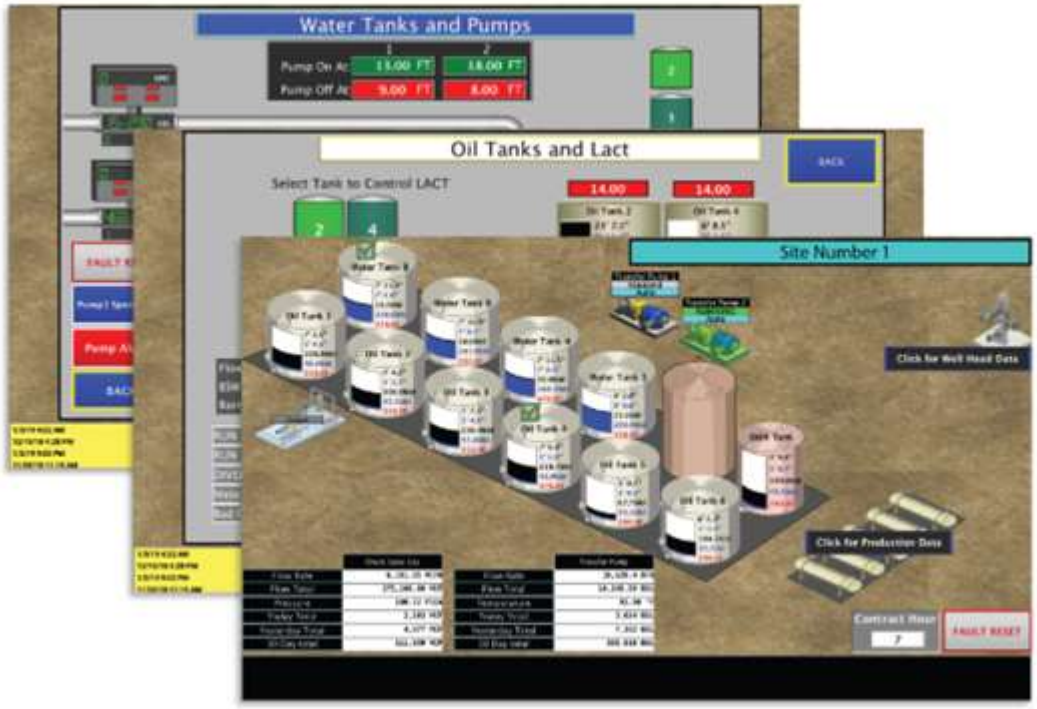
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 4.

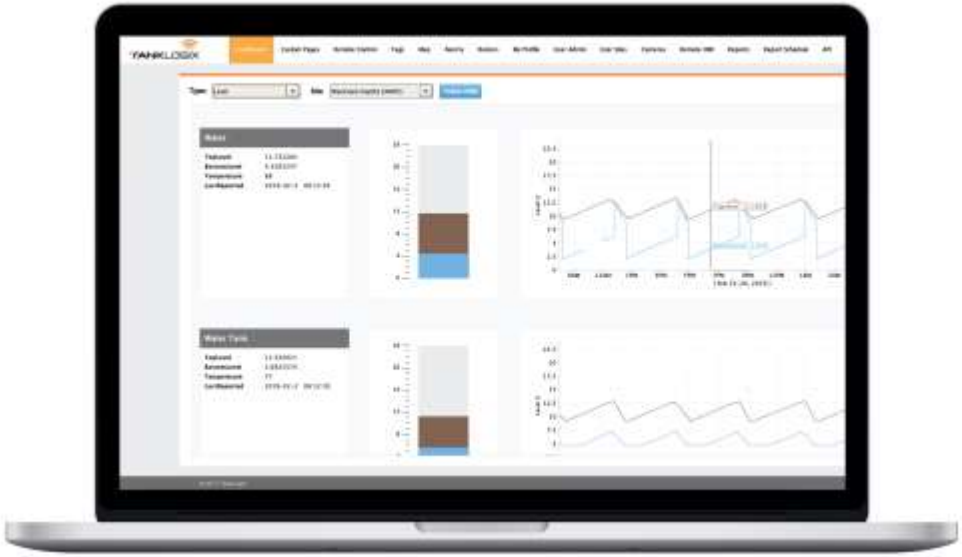
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 1. For example, the image above shows a petro-water disposal facility. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner 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. 9,342,078	The Accused System
[1.3] obtaining a target state of at least one of the fluid-handling devices based on at least some of the plurality of instructions, wherein obtaining a target state of at least one of the fluid-handling devices based on at least some of the plurality of instructions comprises:	The Accused System obtains a target state of at least one of the fluid-handling devices based on at least some of the plurality of instructions. *See, e.g.*: Exhibit 3. For example, the Accused System obtains a target state (e.g., on/off, time, pressure, tank level) based on at least some of the plurality of instructions. *See also* claims 1.1, 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.
[1.4] after receiving the instructions, determining a plurality of different target states of the at least one of the fluid-handling devices, the plurality of	The Accused System determines a plurality of different target states of the at least one of the fluid-handling devices, the plurality of different states each corresponding to different times. *See, e.g.*:

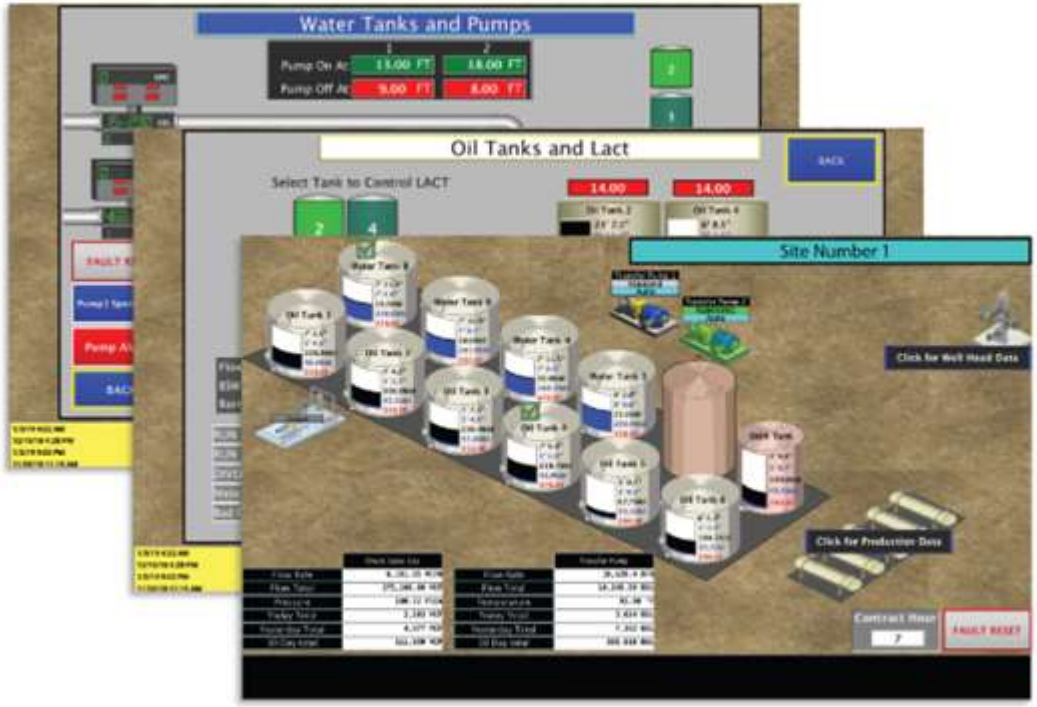
U.S. Patent No. 9,342,078	The Accused System
different states each corresponding to different times;	 Exhibit 1 (annotated). Exhibit 3 (annotated). *See also* claims 1.1, 1.2 above.

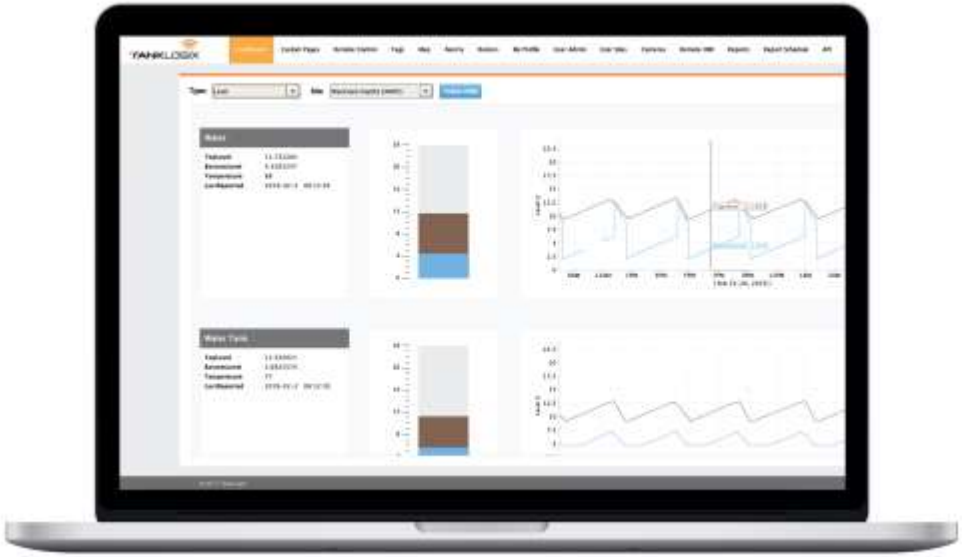
U.S. Patent No. 9,342,078	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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] for each of the plurality of instructions, selecting a respective protocol or protocols from among a plurality of protocols different from the shared protocol, wherein the respective fluid-handling device or devices to which the respective instruction is directed are responsive to the selected respective protocol or protocols, wherein at least some of the selected protocols are different from one another;	The Accused System selects a respective protocol or protocols from among a plurality of protocols different from the shared protocol, wherein the respective fluid-handling device or devices to which the respective instruction is directed are responsive to the selected respective protocol or protocols, wherein at least some of the selected protocols are different from one another. *See, e.g.*:

U.S. Patent No. 9,342,078	The Accused System
	

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 1.

U.S. Patent No. 9,342,078	The Accused 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 (annotated). The Accused System supports communication with a variety of fluid-handling devices, including at least valves, tanks, pumps, flow meters, and sensors. On information and belief, these various fluid-handling devices are responsive to different protocols (e.g., analog in, digital in, Modbus, etc.), and the Accused System selects a protocol different from the shared protocol (e.g. TCP/IP) such that the fluid-handling device is responsive to the respective 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

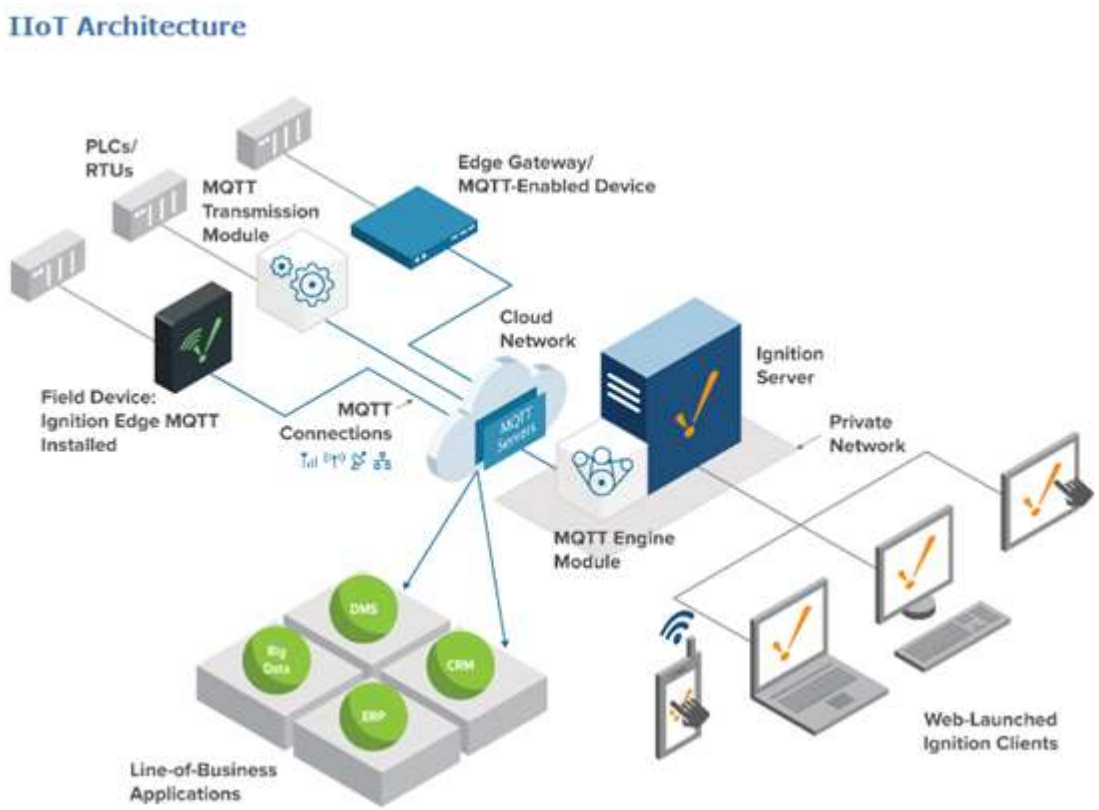
U.S. Patent No. 9,342,078	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.6] after determining the plurality of different target states, translating each received instructions into one or more translated instructions encoded in the selected respective protocol or protocols, the one or more translated instructions including the determined plurality of different target states; and	The Accused System, after determining the plurality of different target states, translates each received instructions into one or more translated instructions encoded in the selected respective protocol or protocols, the one or more translated instructions including the determined plurality of different target states. *See, e.g.*: 

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 1.

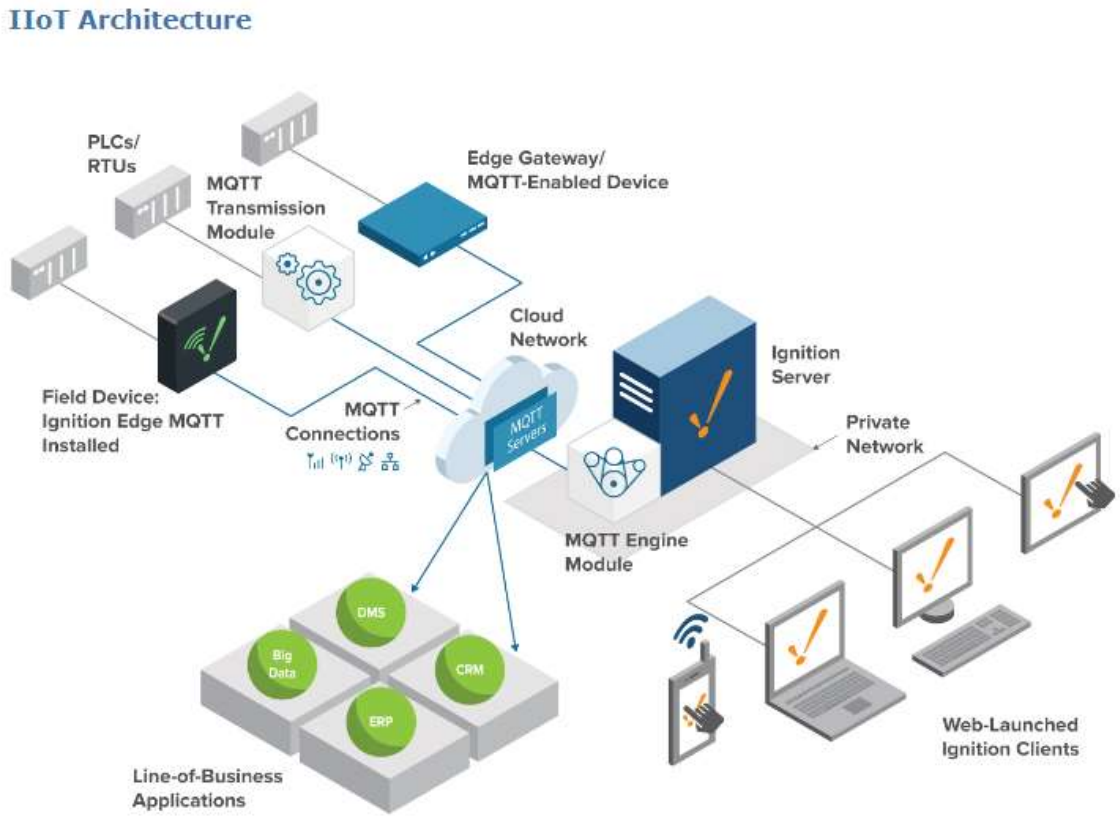
U.S. Patent No. 9,342,078	The Accused System
	TANKLOGIX **Produced Wastewater** This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate 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 (annotated). 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 supports communication with a variety of fluid-handling devices, including at least valves, tanks, pumps, flow meters, and sensors. On information and belief, these various fluid-handling devices are responsive to different protocols (e.g., analog in, digital in, Modbus, etc.), and the Accused System selects a protocol different from the shared protocol (e.g. TCP/IP) such that the fluid-handling device is responsive to the respective protocol.

U.S. Patent No. 9,342,078	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 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] sending each translated instructions to at least the fluid-handling device to which the respective translated instruction is directed, wherein at least some of the translated instructions are effective to cause the at least one of the fluid-handling devices to attempt to achieve the target state.	The Accused System sends each translated instructions to at least the fluid-handling device to which the respective translated instruction is directed, wherein at least some of the translated instructions are effective to cause the at least one of the fluid-handling devices to attempt to achieve the target state. *See, e.g.*: Exhibit 3 (annotated). *See also*, claims 1.1, 1.2, 1.4, 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

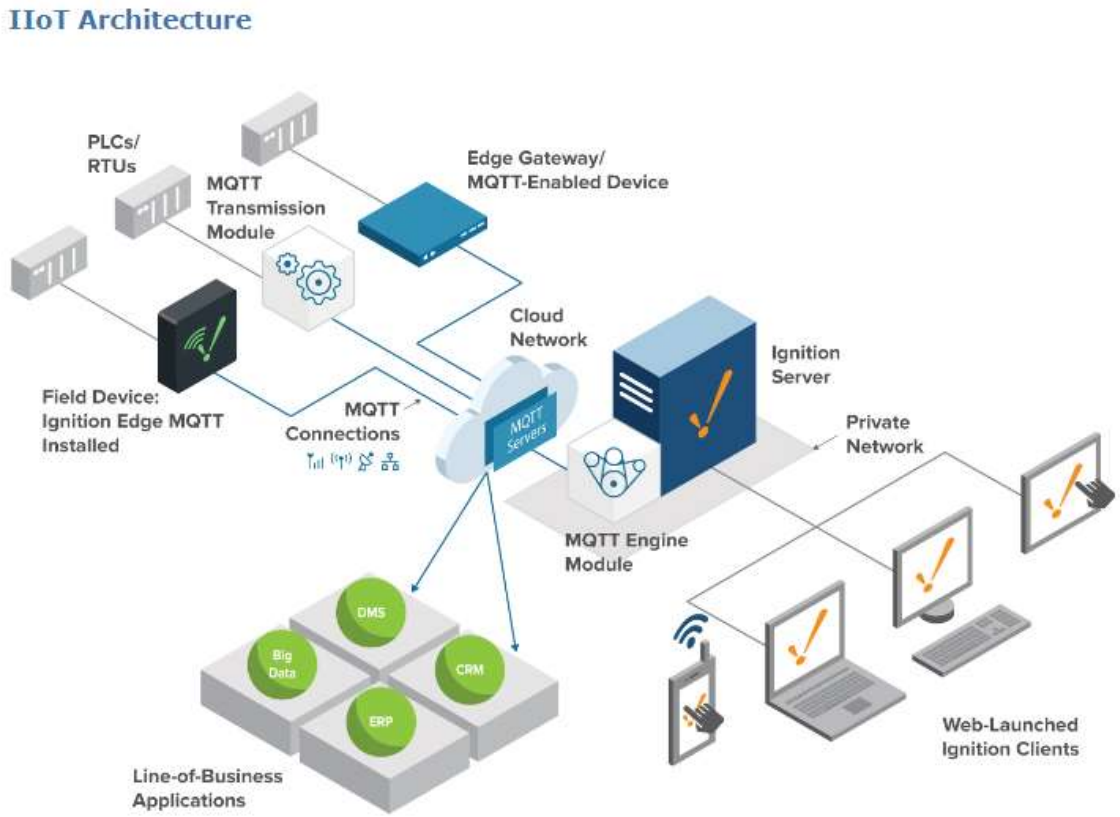
U.S. Patent No. 9,342,078	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 2	
[2.1] The method of claim 1, wherein selecting a respective protocol or protocols comprises:	To the extent the preamble is found limiting, the Accused System practices the method of claim 1. *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.
[2.2] parsing, from at least one of the received instructions, an identifier of one of the fluid-handling devices; and	The Accused System parses, from at least one of the received instructions, an identifier of one of the fluid-handling devices. *See, e.g.*: The identifier parsed from at least one of the received instructions is, e.g., an identifier of a pump driven by VFDs. 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.

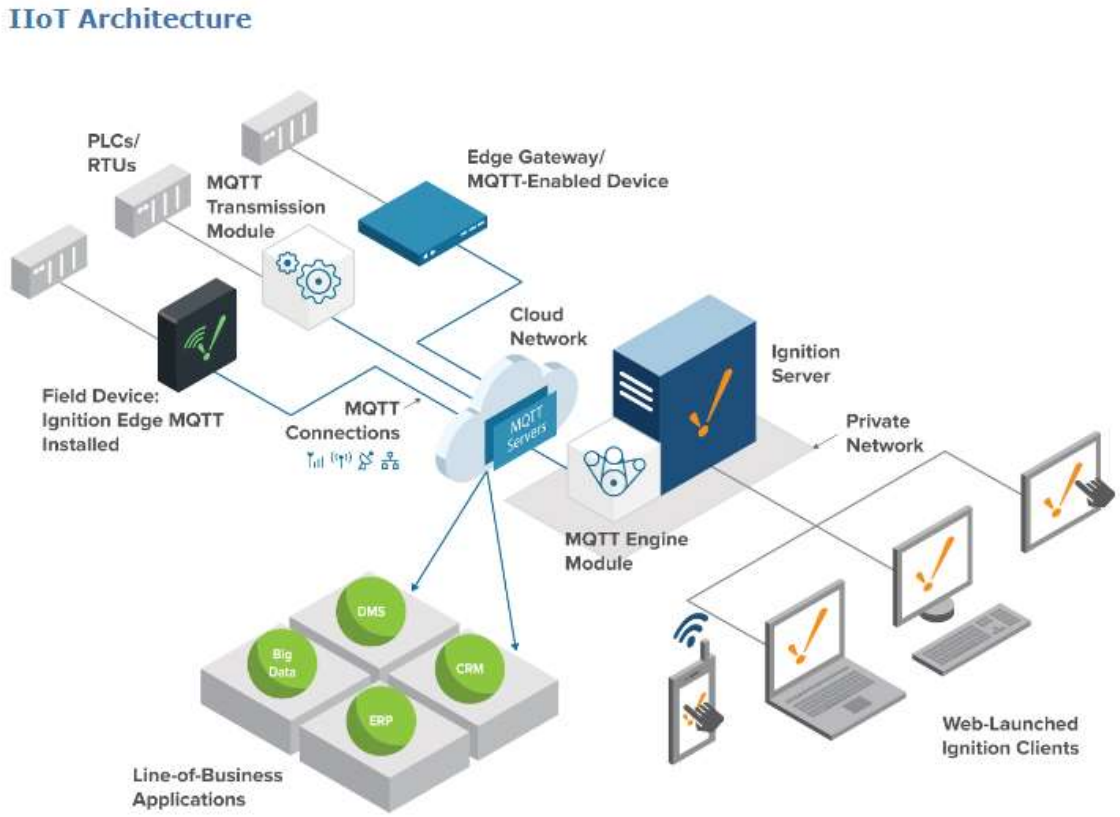
U.S. Patent No. 9,342,078	The Accused System
[2.3] based on the parsed identifier, retrieving from memory one or more records, including an identifier of at least one selected respective protocol and an identifier of a bus to which the identified fluid-handling device is communicatively coupled.	The Accused System, based on the parsed identifier, retrieving from memory one or more records, including an identifier of at least one selected respective protocol and an identifier of a bus to which the identified fluid-handling device is communicatively coupled. *See, e.g.*:  Exhibit 2.

U.S. Patent No. 9,342,078	The Accused System
	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 bus. 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 3	
[3.1] The method of claim 2, wherein sending each translated instructions to at least the fluid-handling device to which the respective instruction is directed comprises:	To the extent the preamble is found limiting, the Accused System performs the method as claimed. *See* claim 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.
[3.2] sending an address of the identified fluid-handling device on the identified bus in association with at	The Accused System sends an address of the identified fluid-handling device on the identified bus in association with at least some of the translated instructions. *See, e.g.*:

U.S. Patent No. 9,342,078	The Accused System
least some of the translated instructions.	 Exhibit 2. The server (for example, the Ignition Server) sends an address of the identified fluid-handling device (e.g., PLC) in association with at least some of the translated instructions. 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. 9,342,078	The Accused 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 4	
[4.1] The method of claim 2, wherein sending each translated instructions to at least the fluid-handling device to which the respective instruction is directed comprises:	To the extent the preamble is found limiting, the Accused System performs the method as claimed. *See, e.g.*: *See,* claim 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.
[4.2] providing at least some of the translated instructions to a link-layer device connected to the identified bus; and	The Accused System provides at least some of the translated instructions to a link-layer device connected to the identified bus. *See, e.g.*:

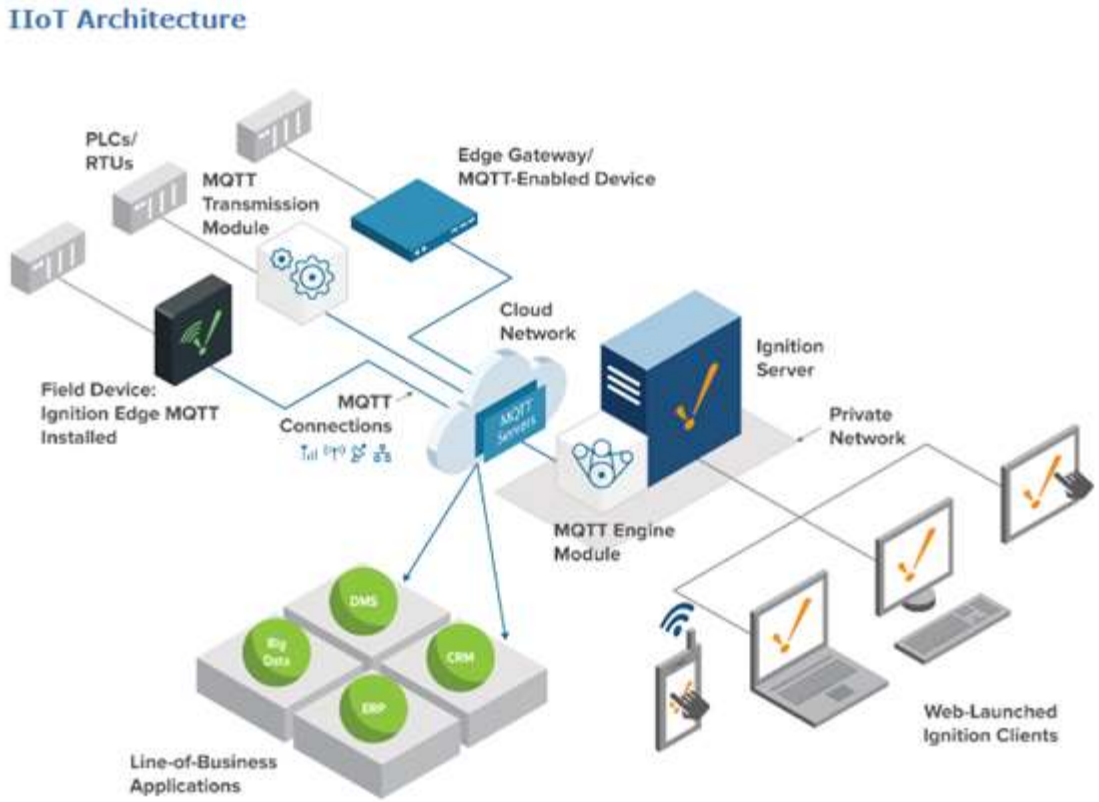
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 2. On information and belief, Accused System is configured to translate commands in MQTT from the server system from MQTT to commands in Ethernet and modbus, each of which entails a respective format and protocol. The Accused System satisfies the 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

U.S. Patent No. 9,342,078	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.
[4.3] encoding the translated instructions with the link-layer device in accordance with the physical medium by which the identified bus is implemented.	The Accused System encodes the translated instructions with the link-layer device in accordance with the physical medium by which the identified bus is implemented. *See, e.g.*: 

U.S. Patent No. 9,342,078	The Accused System
	Exhibit 2. On information and belief, the Accused System is configured to translate commands in MQTT from the server system from MQTT to commands in Ethernet and modbus, each of which entails a respective format and protocol. The MQTT.org website explains that "MQTT allows for messaging between device to cloud and cloud to 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 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 5	
[5.1] The method of claim 2, wherein sending each translated instruction to at least the fluid-handling device to which the respective instruction is directed comprises:	To the extent the preamble is found limiting, the Accused System performs the method as claimed. *See, e.g.*: *See,* claim 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.

U.S. Patent No. 9,342,078	The Accused System
[5.2] providing at least some of the translated instructions to a digital-to-analog converter connected to the identified bus; and	The Accused System provides at least some of the translated instructions to a digital-to-analog converter connected to the identified bus. *See, e.g.*: On information and belief, the Accused System is configured to provide at least some of the translated instructions to a digital-to-analog converter. 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.
[5.3] sending the at least some of the translated instructions to the identified fluid-handling device with the digital-to-analog converter.	The Accused System sends the at least some of the translated instructions to the identified fluid-handling device with the digital-to-analog converter. *See, e.g.*: On information and belief, the Accused System is configured to send translated instructions to the identified fluid-handling device in a variety of protocols, such as digital or analog outputs understood by the fluid-handling device. *See also* claims 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.
Claim 6	

U.S. Patent No. 9,342,078	The Accused System
[6.1] The method of claim 1, wherein:	To the extent the preamble is found limiting, the Accused System performs the method of claim 1. *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.
[6.2] the at least some of the translated instructions are effective to cause the at least one of the fluid-handling devices to attempt to achieve the plurality of different target state at the different times.	The Accused System performs the method where at least some of the translated instructions are effective to cause the at least one of the fluid-handling devices to attempt to achieve the plurality of different target state at the different times. *See, e.g.*:

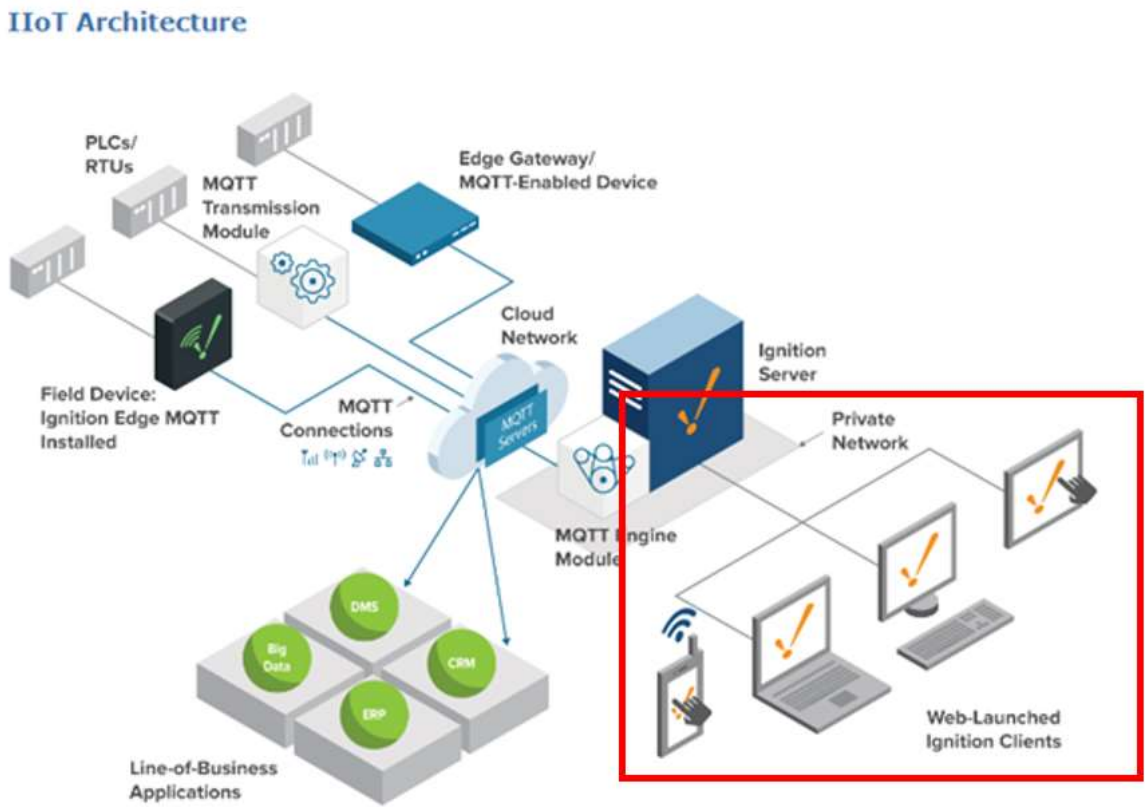
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 2.

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 3 (annotated). *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 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 method of claim 6, comprising: **losing a network connection by which at least some of the plurality of user-directed instructions are received; and** **after losing the network connection, continuing to cause the at least one of the fluid-handling devices to attempt**	The Accused System includes losing a network connection by which at least some of the plurality of user-directed instructions are received; and after losing the network connection, continuing to cause the at least one of the fluid-handling devices to attempt to achieve the plurality of different target state at the different times and continuing to execute instructions among the plurality of received instructions received prior to losing the network connection before entering an automatic mode. *See, e.g.*: *See* claim 6 above.

U.S. Patent No. 9,342,078	The Accused System
to achieve the plurality of different target state at the different times and continuing to execute instructions among the plurality of received instructions received prior to losing the network connection before entering an automatic mode.	 Panel **Ignition Edge Panel** includes everything in Ignition Edge IIoT plus local visualization functionality for your HMIs. Choose between Perspective (2 sessions) or Vision (1 local client, 1 remote client) as your visualization system for Edge Panel. Build future-proof, robust local control systems that are Industry 4.0-compatible. It's ideal for standalone HMIs and providing a local-client fallback for field HMIs if the network connection is lost. Like Ignition Edge IIoT, Ignition Edge Panel includes unlimited tags and device connections for included drivers, the ability to publish MQTT data, run scripts, create REST APIs, synchronize data to a central server, and act as an **EAM Agent Gateway**. Additionally, both the **Web Browser module** and **Symbol Factory** image library are included in Edge Panel. 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 8	
[8] The method of claim 6, wherein the plurality of different states ramp up or ramp down a motor speed of a motor of the at least one of the fluid-handling devices.	The Accused System performs the method of claim 6, wherein the plurality of different states ramp up or ramp down a motor speed of a motor of the at least one of the fluid-handling devices. *See, e.g.*:

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 3 (annotated). *See* claim 6 above. *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 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 method of claim 6, wherein the plurality of different states oscillate a physical state of the at least one of the fluid-handling devices.	The Accused System performs the method of claim 6, wherein the plurality of different states oscillate a physical state of the at least one of the fluid-handling devices. *See, e.g.*: *See* claims 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

U.S. Patent No. 9,342,078	The Accused 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 11	
[11] The method of claim 1, wherein at least some of the received instructions identify an automatic mode in which a collection of target states are computed to operate within process constraints.	The Accused System performs the method of claim 1, wherein at least some of the received instructions identify an automatic mode in which a collection of target states are computed to operate within process constraints. *See, e.g.*: For example, on information and belief, the 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 the final state. *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 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] The method of claim 1, wherein at least some of the received instructions correspond to a manual mode in which an individual one of the fluid-handling	The Accused System performs the method of claim 1, wherein at least some of the received instructions correspond to a manual mode in which an individual one of the fluid-handling devices is remotely controlled by a user. *See, e.g.*:

U.S. Patent No. 9,342,078	The Accused System
devices is remotely controlled by a user.	 Exhibit 2 (annotated). *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 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. 9,342,078	The Accused 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 13	
[13.1] The method of claim 1, comprising:	To the extent the preamble is found limiting, the Accused System performs the method as claimed. *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.
[13.2] before sending at least one of the translated instructions, accessing a constraint value stored in memory;	The Accused System, before sending at least one of the translated instructions, accesses a constraint value stored in memory. *See, e.g.*: An example constraint (for a motor) shown in the schematic below can be stored in the first computer system. The system determines the other command will cause the first fluid handing site to violate the constraint, and determines not to execute the other command.

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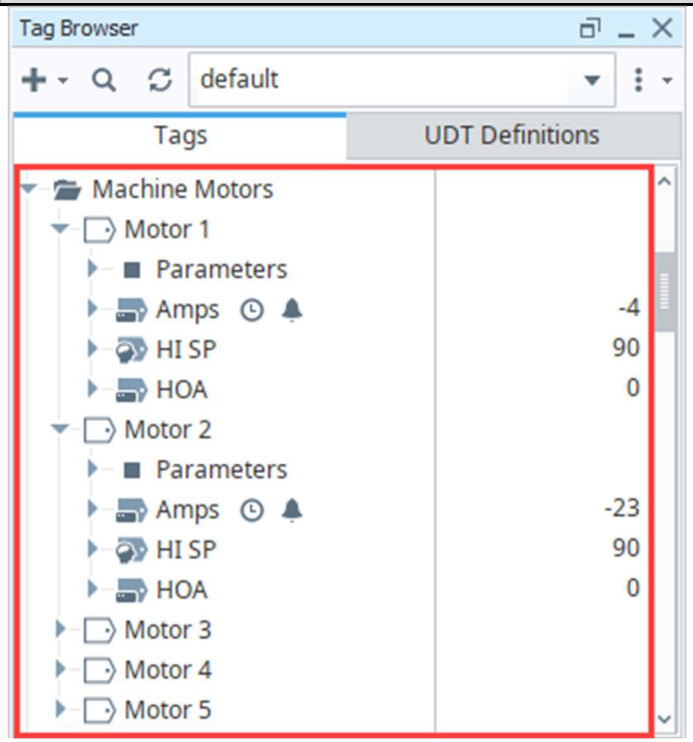
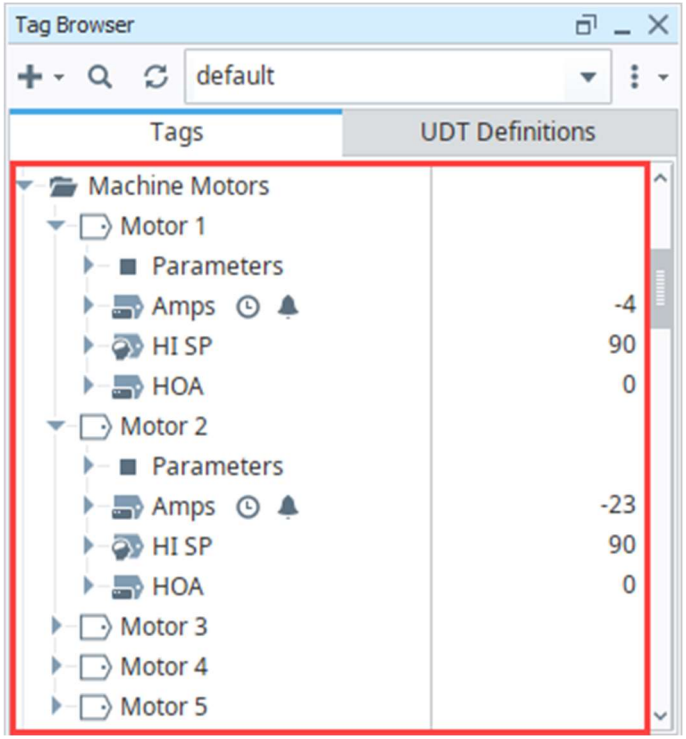
	 Exhibit 6. *See also* claim 1 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences 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. 9,342,078	The Accused System
[13.3] determining that the at least one of the translated instructions will not violate the constraint value; and	The Accused System determines that the at least one of the translated instructions will not violate the constraint value. *See, e.g.*: An example constraint (for a motor) shown in the schematic below can be stored in the first computer system. The system determines the other command will cause the first fluid handing site to violate the constraint, and determines not to execute the other command.  Exhibit 6. *See also* claim 1 above.

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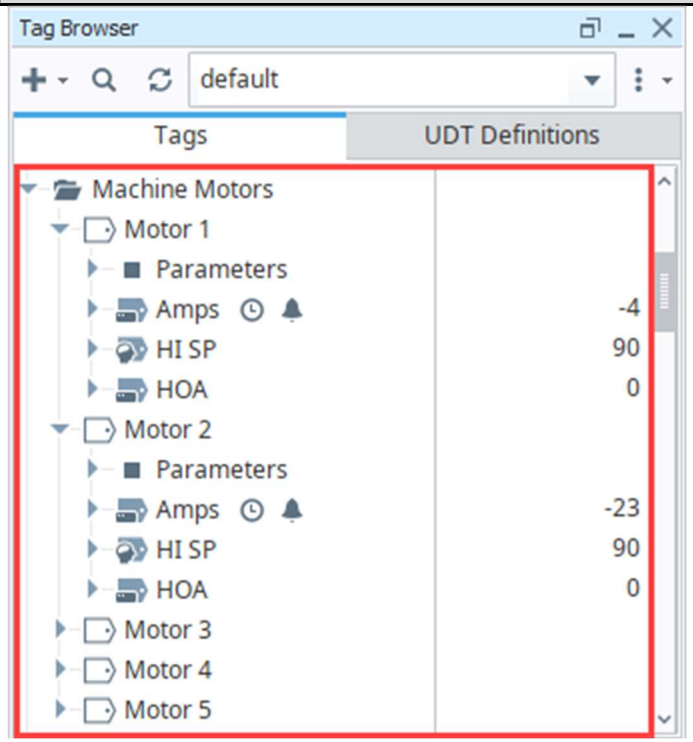
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references 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.
[13.4] in response to the determination, sending the at least one of the translated instructions.	The Accused System, in response to the determination, sends the at least one of the translated instructions. *See, e.g.*: An example constraint (for a motor) shown in the schematic below can be stored in the first computer system. The system determines the other command will cause the first fluid handing site to violate the constraint, and determines not to execute the other command.

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 6. *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 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.

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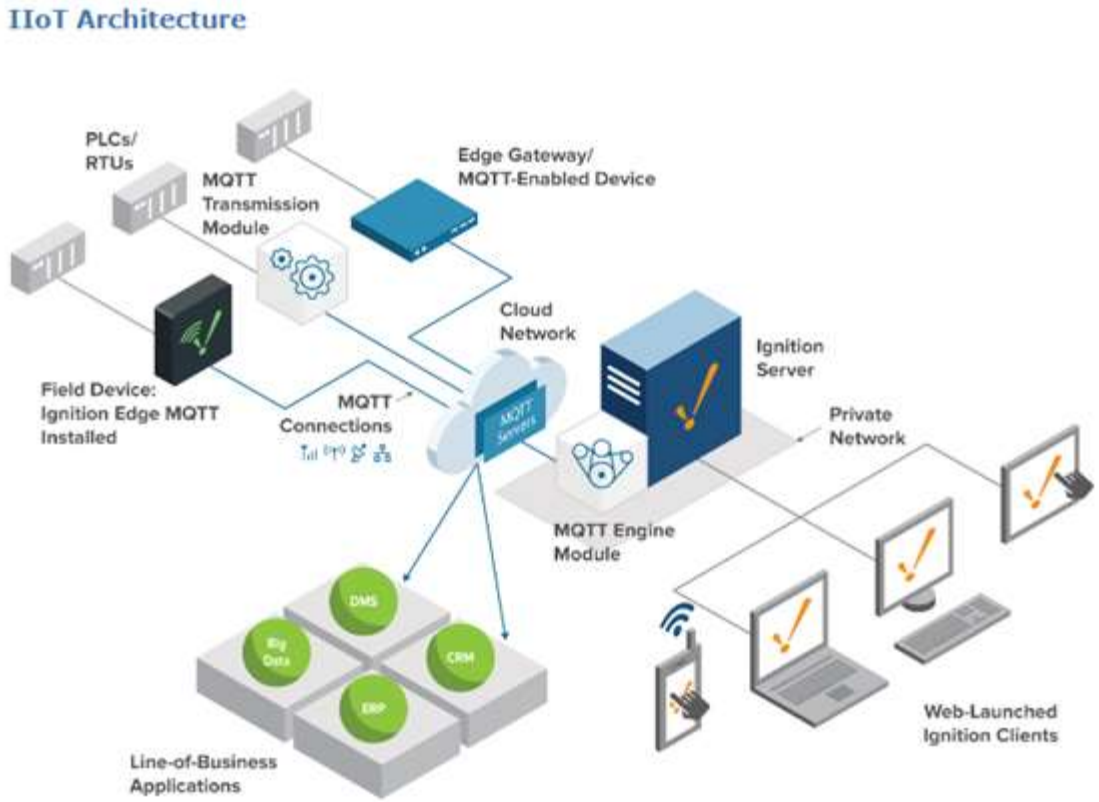
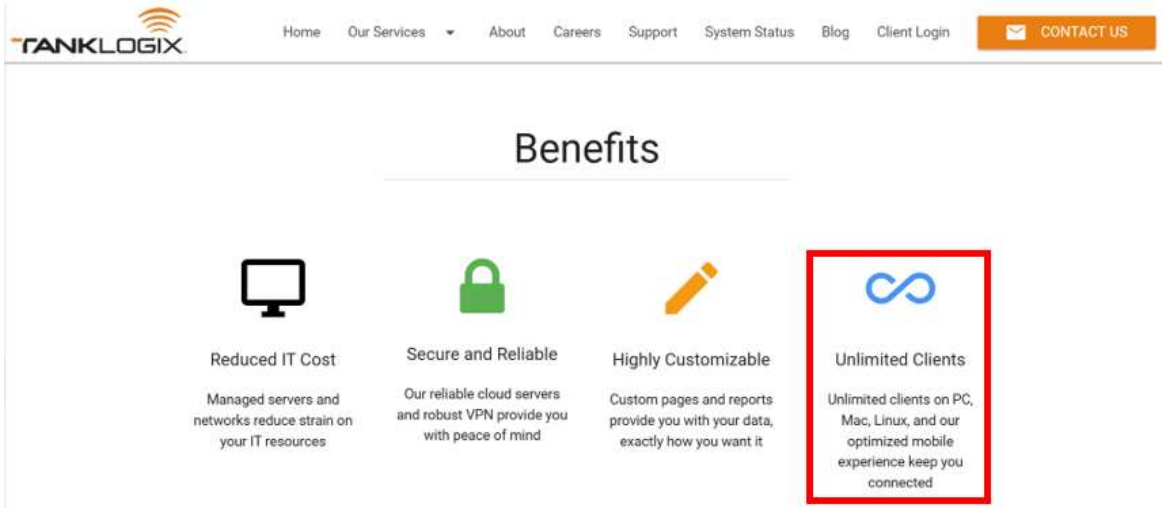
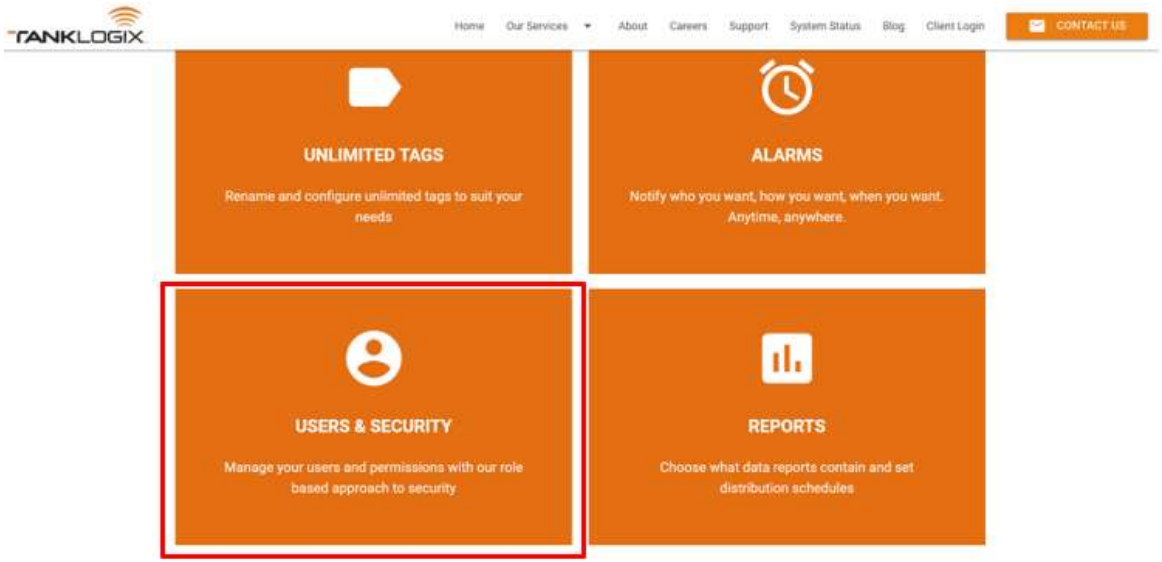
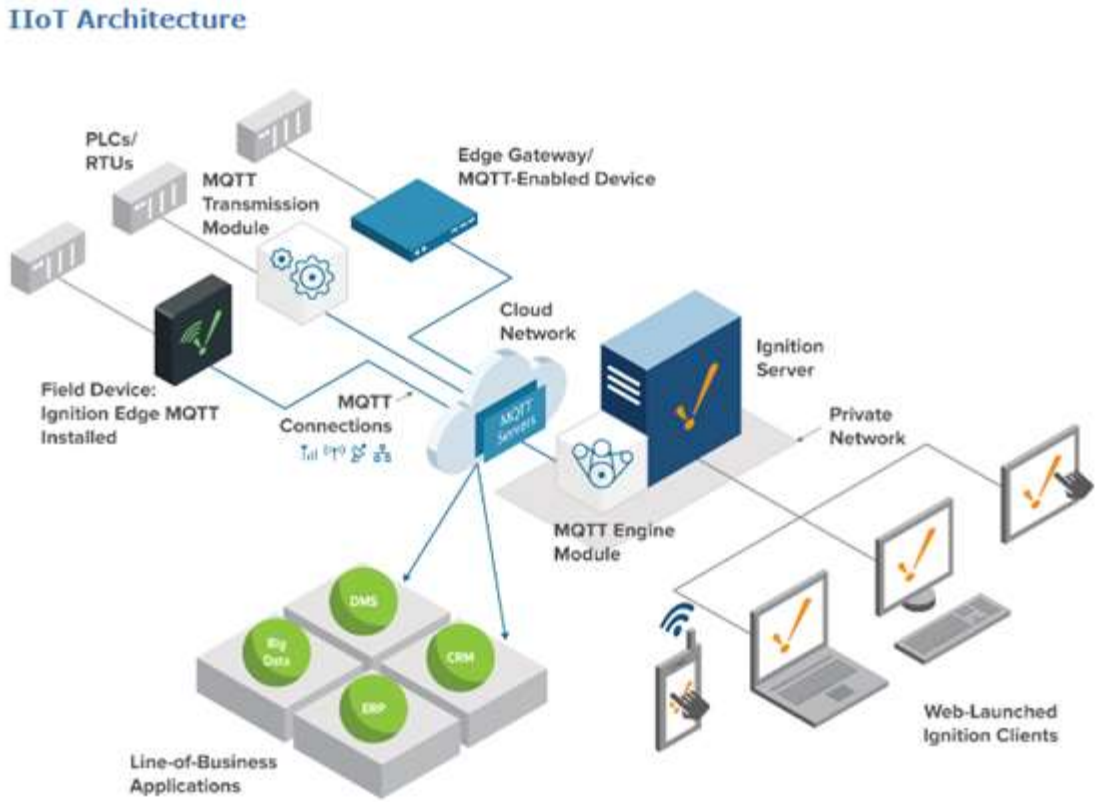
Claim 15	
[15] The method of claim 1, wherein a given one of the fluid-handling devices comprises a proportional-integral-derivative controller, and wherein at least some of the translated instructions adjust a set point of the proportional-integral-derivative controller.	The Accused System performs the method of claim 1, wherein a given one of the fluid-handling devices comprises a proportional-integral-derivative controller, and wherein at least some of the translated instructions adjust a set point of the proportional-integral-derivative controller. *See, e.g.*: *See* claim 1 above. Exhibit 3 (annotated). On information and belief, the Accused System's VFDs (variable frequency drives) include proportional-integral-derivative (PID) controllers. PID feedback control entails adjustment of a set point by at least some of the translated instructions. 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

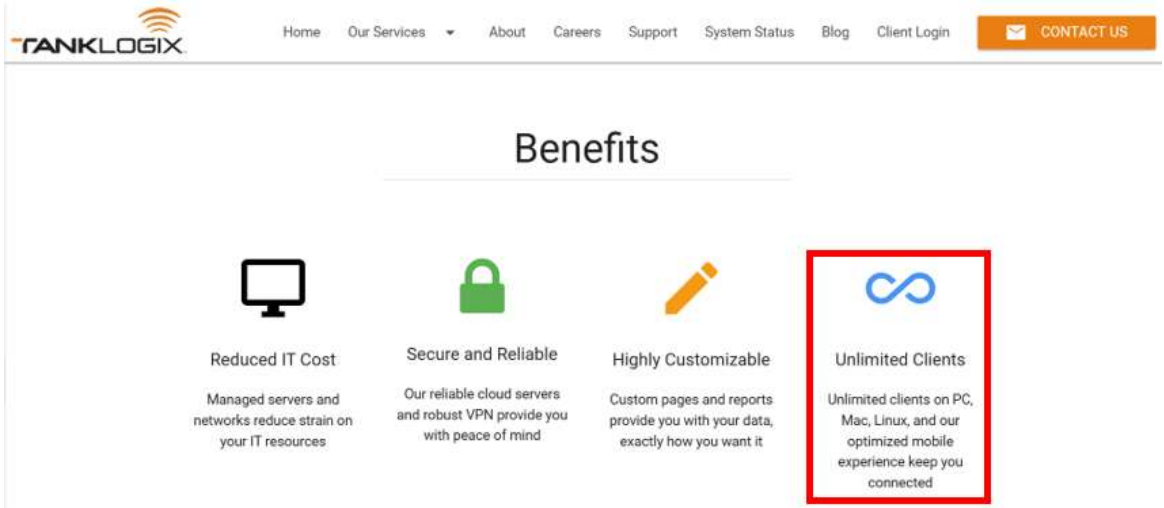
U.S. Patent No. 9,342,078	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 16	
[16.1] The method of claim 1, comprising:	To the extent the preamble is found limiting, the Accused System performs the method as claimed. *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.
[16.2] receiving, at a remote server system, via a network, user credentials from a user device;	The Accused System, receives, at a remote server system, via a network, user credentials from a user device. *See, e.g.*:

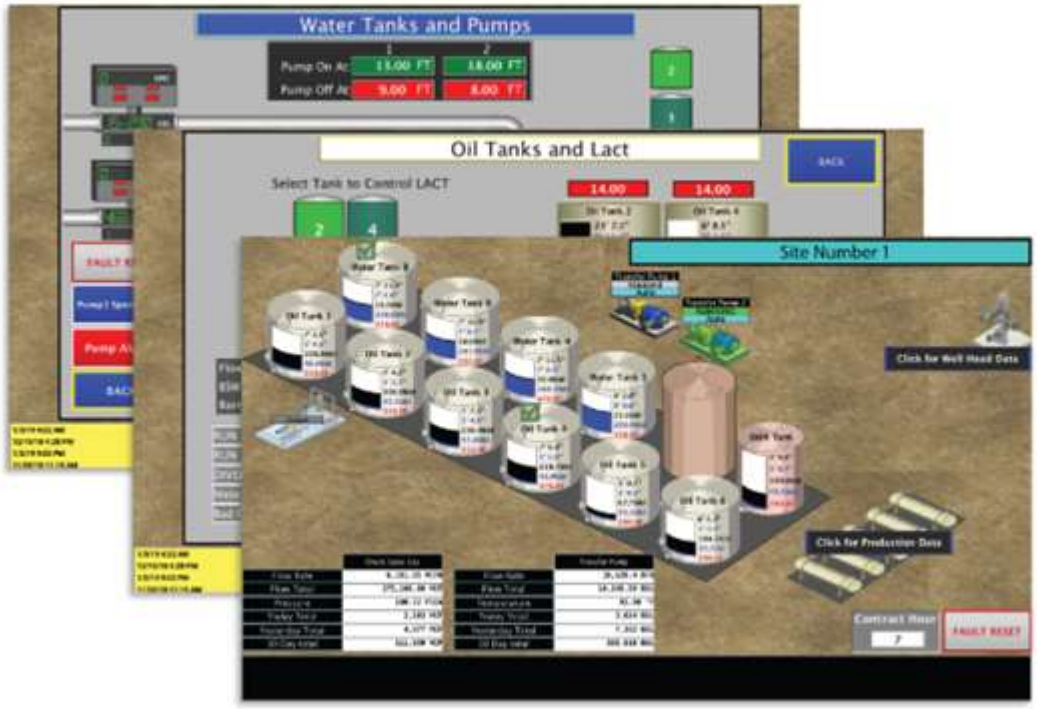
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 2.

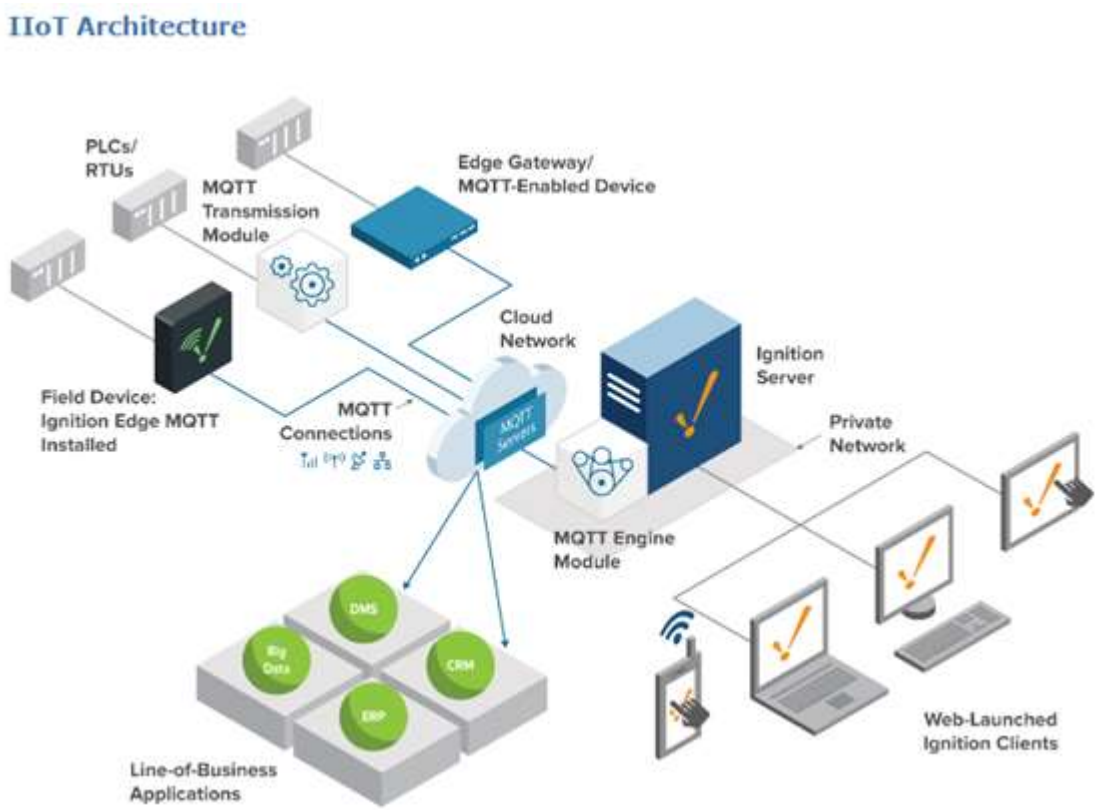
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 1 (annotated).

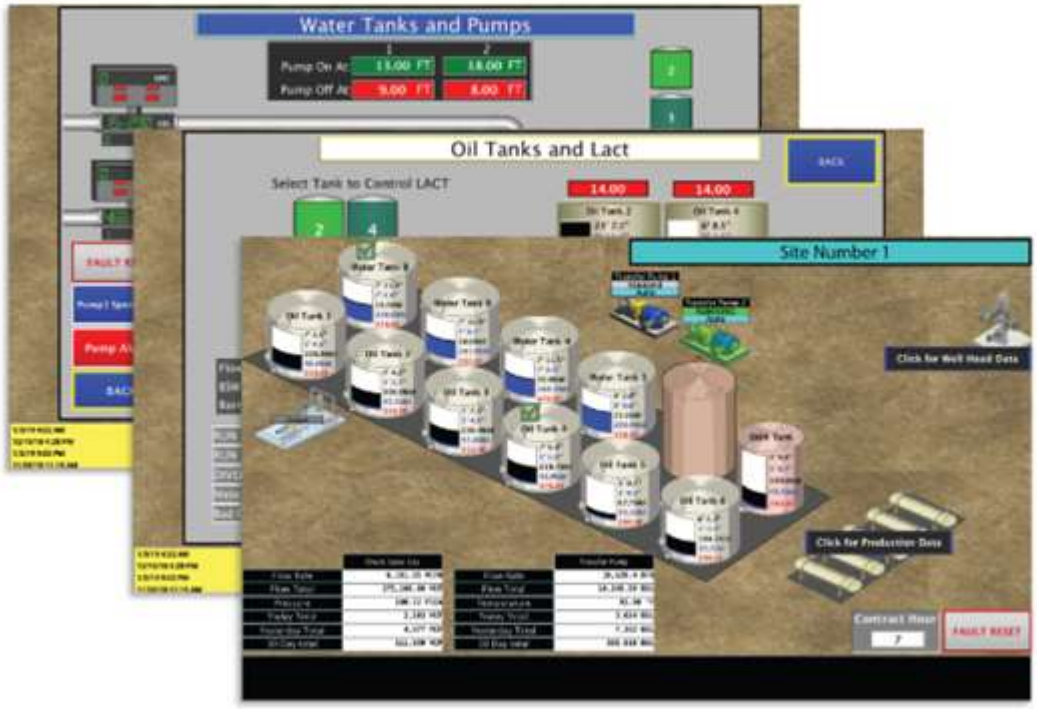
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.
[16.3] identifying, with the remote server system, an account based on the user credentials, the account including identifiers of the oil well, the petro water disposal or re-injection facility,	The Accused System identifies, with the remote server system, an account based on the user credentials, the account including identifiers of the oil well, the petro water disposal or re-injection facility, or the petroleum pumping station and at least one other facility. *See, e.g.*:

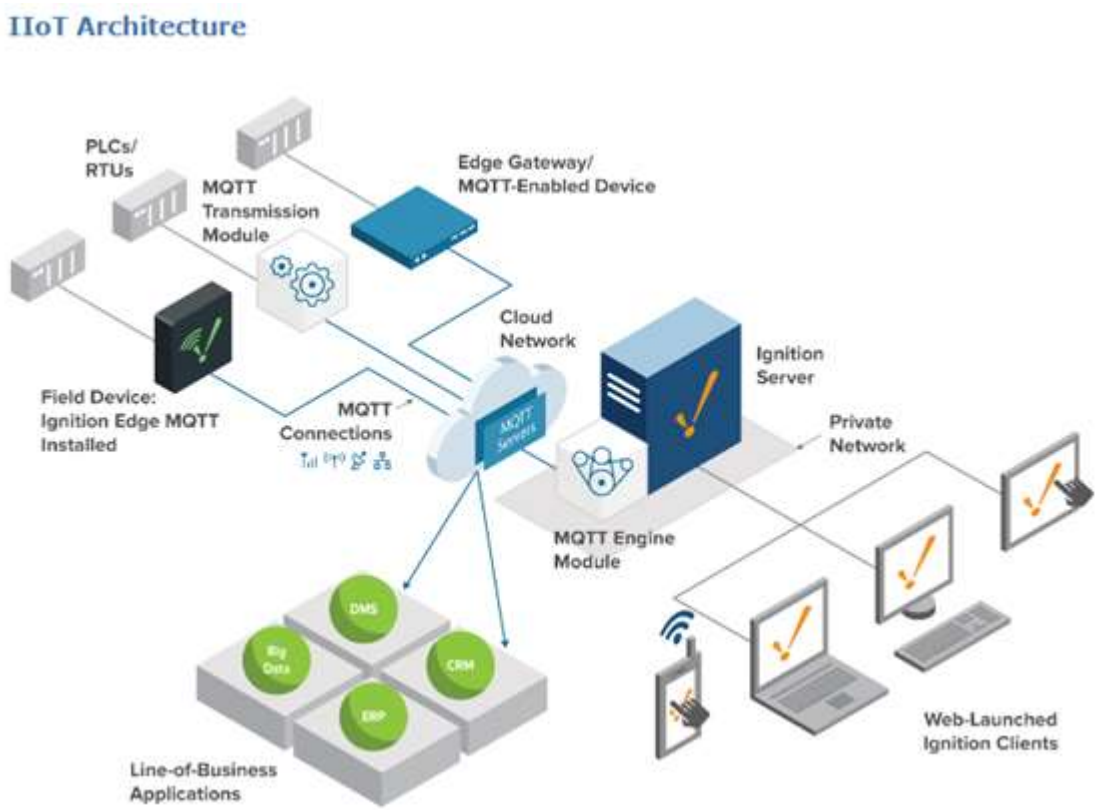
U.S. Patent No. 9,342,078	The Accused System
or the petroleum pumping station and at least one other facility;	 Exhibit 2.

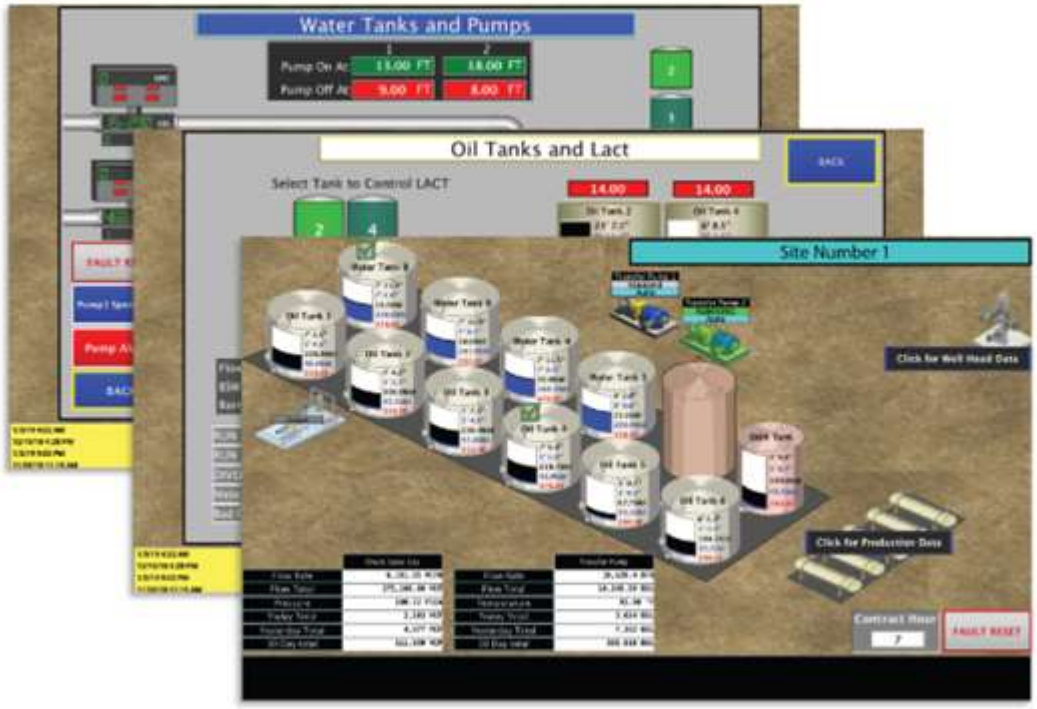
U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 1 (annotated).

U.S. Patent No. 9,342,078	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 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.

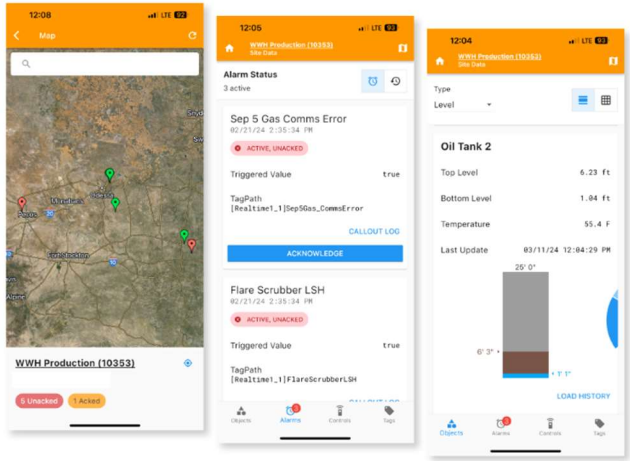
U.S. Patent No. 9,342,078	The Accused System
[16.4] receiving from the user device, at the remote server system, a request corresponding to at least one of the received instructions, the request including an identifier of the oil well, the petro water disposal or re-injection facility, or the petroleum pumping station;	The Accused System receives, from the user device, at the remote server system, a request corresponding to at least one of the received instructions, the request including an identifier of the oil well, the petro water disposal or re-injection facility, or the petroleum pumping station. *See, e.g.*:  Exhibit 2.

U.S. Patent No. 9,342,078	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 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.

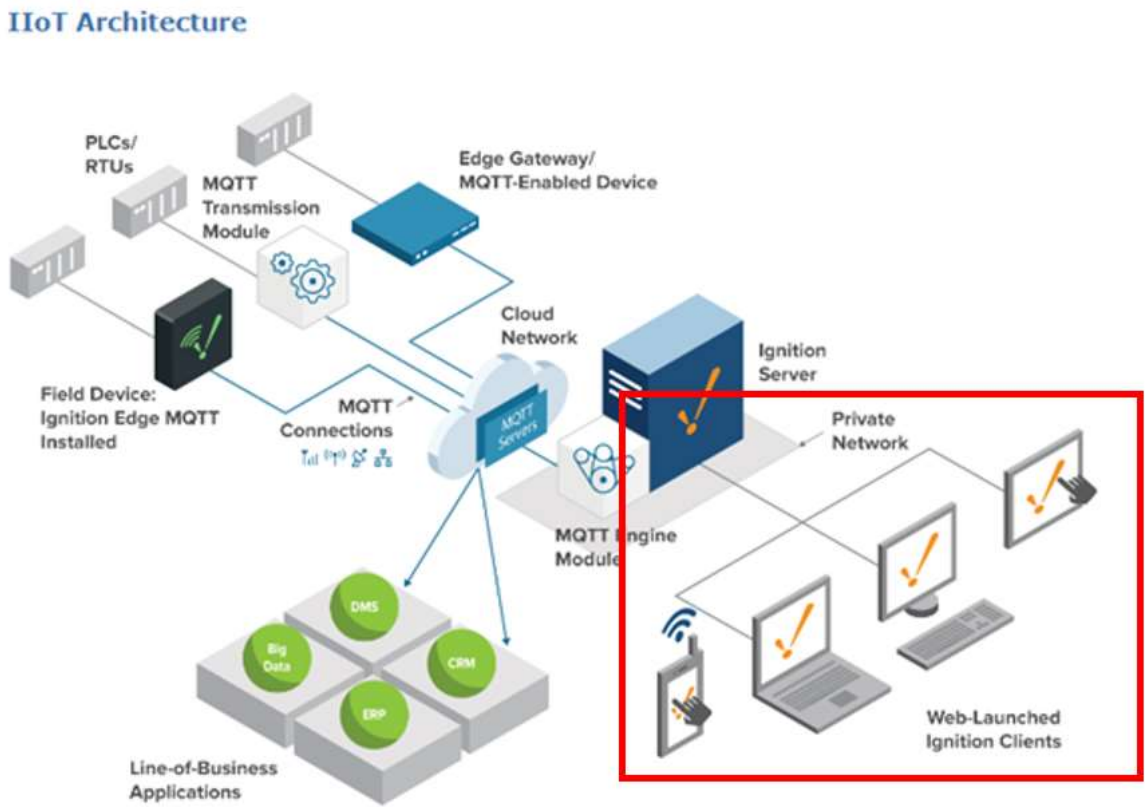
U.S. Patent No. 9,342,078	The Accused System
[16.5] identifying, with the remote server system, an Internet Protocol address at which the network interface is reachable based on the identifier of the oil well, the petro water disposal or re-injection facility, or the petroleum pumping station; and	The Accused System identifies, with the remote server system, an Internet Protocol address at which the network interface is reachable based on the identifier of the oil well, the petro water disposal or re-injection facility, or the petroleum pumping station. *See, e.g.*:  Exhibit 2.

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 3. *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 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

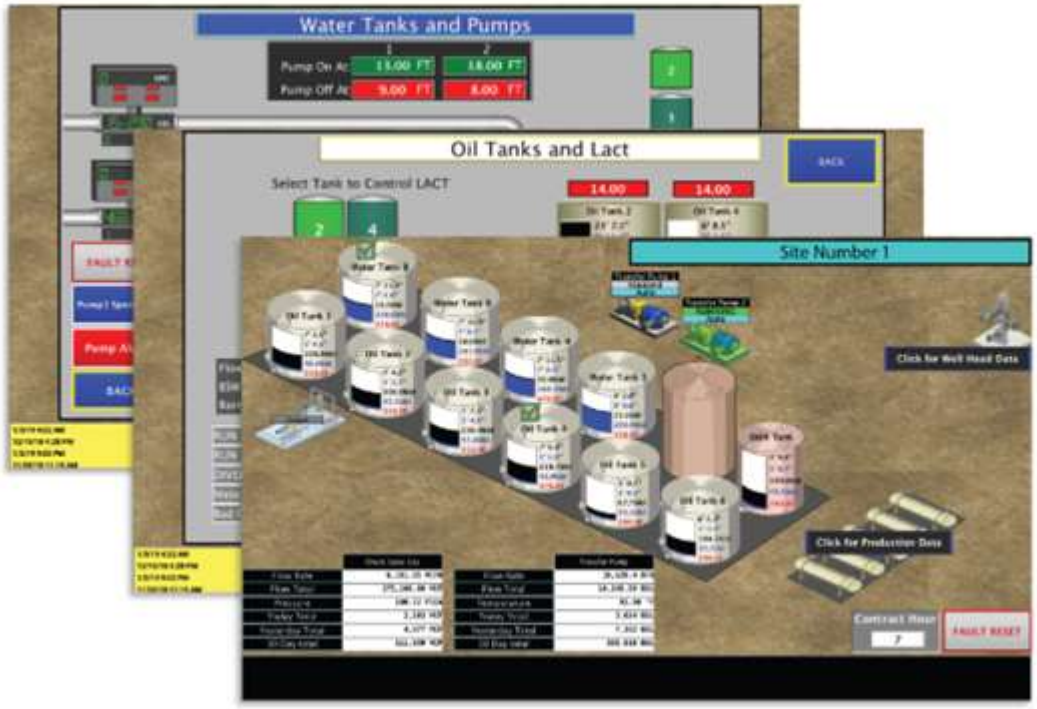
U.S. Patent No. 9,342,078	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[16.6] sending, from the remote server system, the at least one of the received instructions to the identified Internet Protocol address in response to the request.	The Accused System performs sending, from the remote server system, the at least one of the received instructions to the identified Internet Protocol address in response to the request. *See, e.g.*: *See* claims 1, 16.4, 16.5, 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.
Claim 17	
[17] The method of claim 16, wherein the user device is a smartphone executing a smartphone application that communicates with the remote server system via an application program interface.	The Accused System performs the method of claim 16, wherein the user device is a smartphone executing a smartphone application that communicates with the remote server system via an application program interface. *See, e.g.*:

U.S. Patent No. 9,342,078	The Accused System
	Intuitive Mobile Experience • Realtime & historical data views • Remote control • Tag view • Map view with directions • View and acknowledge alarms • Informative graphics and charts • Customizable alarm sounds • SWD ticket, customer, driver management • Lightweigt and fast • Native to Android and iOS  Exhibit 1. *See also* claims 1, 16 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	
[18.1] The method of claim 16, wherein receiving from the user device the request corresponding to the at	To the extent the preamble is found limiting, the Accused System performs the method as claimed.

U.S. Patent No. 9,342,078	The Accused System
least one of the received instructions comprises:	*See* claim 16 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.
[18.2] receiving the request from a web interface in a web browser executing on the user device.	The Accused System receives the request from a web interface in a web browser executing on the user device. *See, e.g.*:

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 2 (annotated). *See also* claims 1, 16 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. 9,342,078	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 19	
[19.1] The method of claim 1, comprising:	To the extent the preamble is found limiting, the Accused System performs the method as claimed. *See, 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 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.
[19.2] producing oil or gas;	The Accused System is used in producing oil or gas. *See, e.g.*: *See, 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 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.
[19.3] disposing of petro water; or	The Accused System is used at petro water disposal sites. *See, e.g.*:

U.S. Patent No. 9,342,078	The Accused System
	 Exhibit 1. *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 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. 9,342,078	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.
[19.4] re-injecting petro water.	The Accused System is used at petro water disposal sites. *See, e.g.*: *See* claim element 19.4 above. *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 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.

Exhibit B

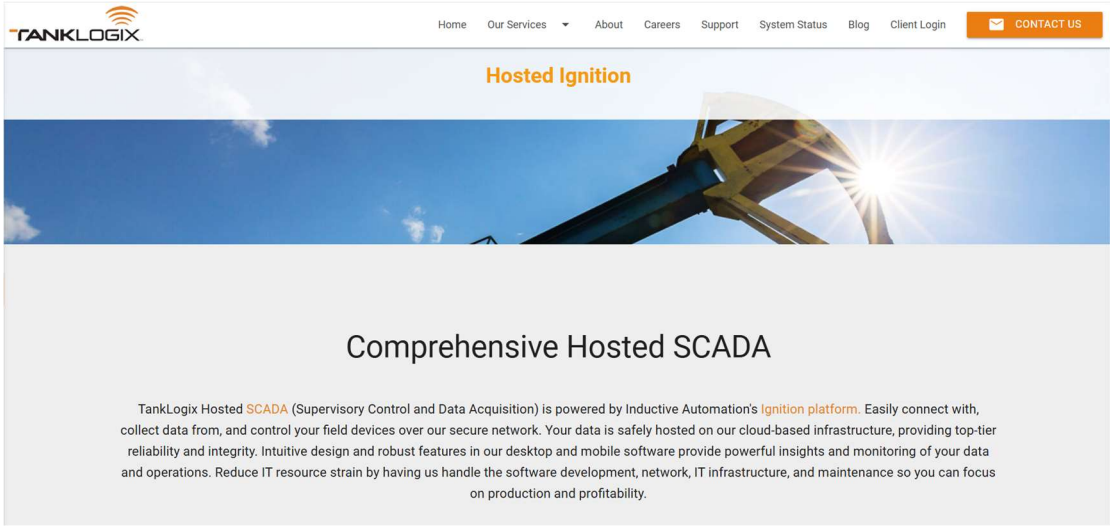
Infringement Analysis of U.S. Patent No. 10,488,871 Against the TankLogix Ignition-Hosted Automation System Implemented by TankLogix LLC ("TankLogix")

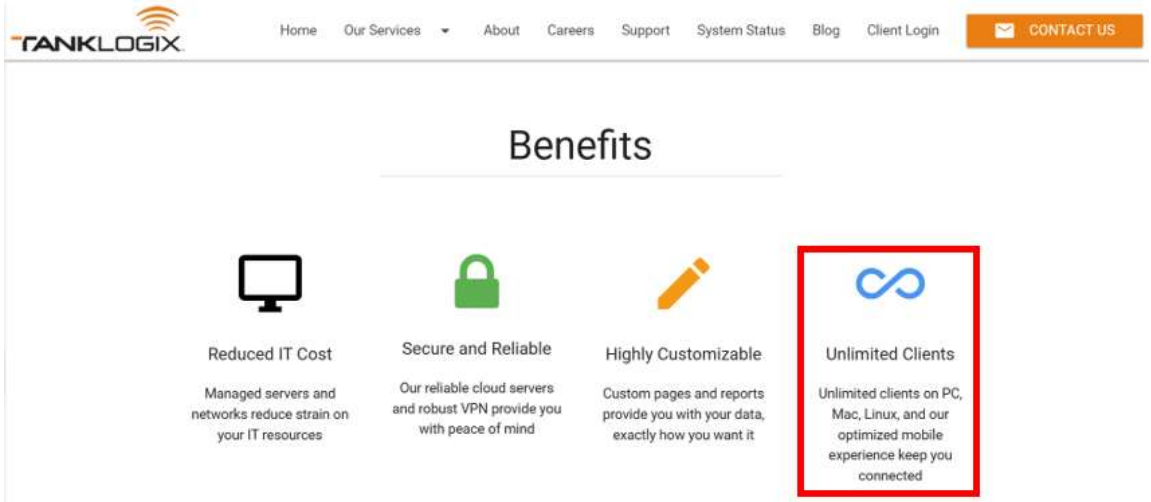
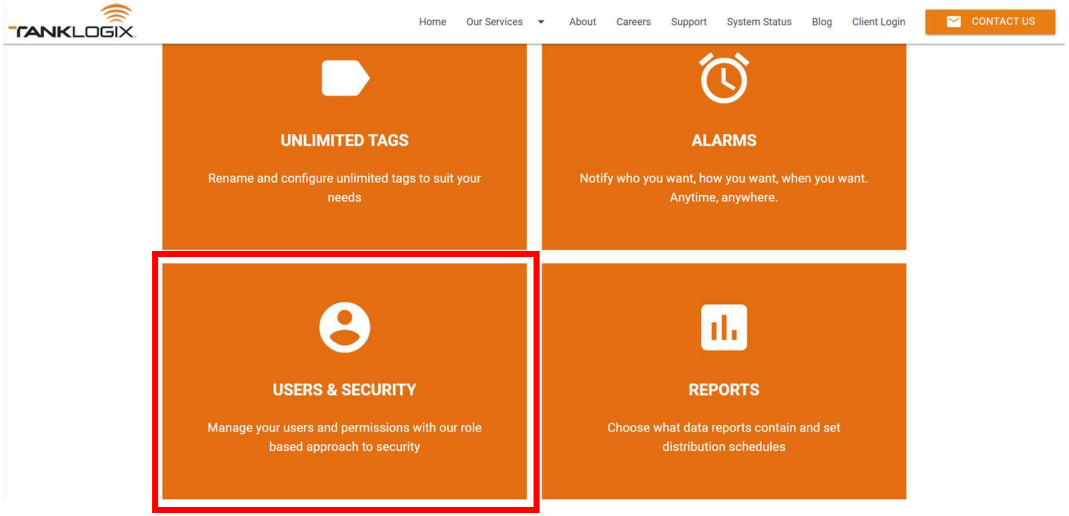
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System(s) each element of claims 18-34 of U.S. Patent No. 10,488,871 (the "'871 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed and implemented by TankLogix, LLC.

References Cited:

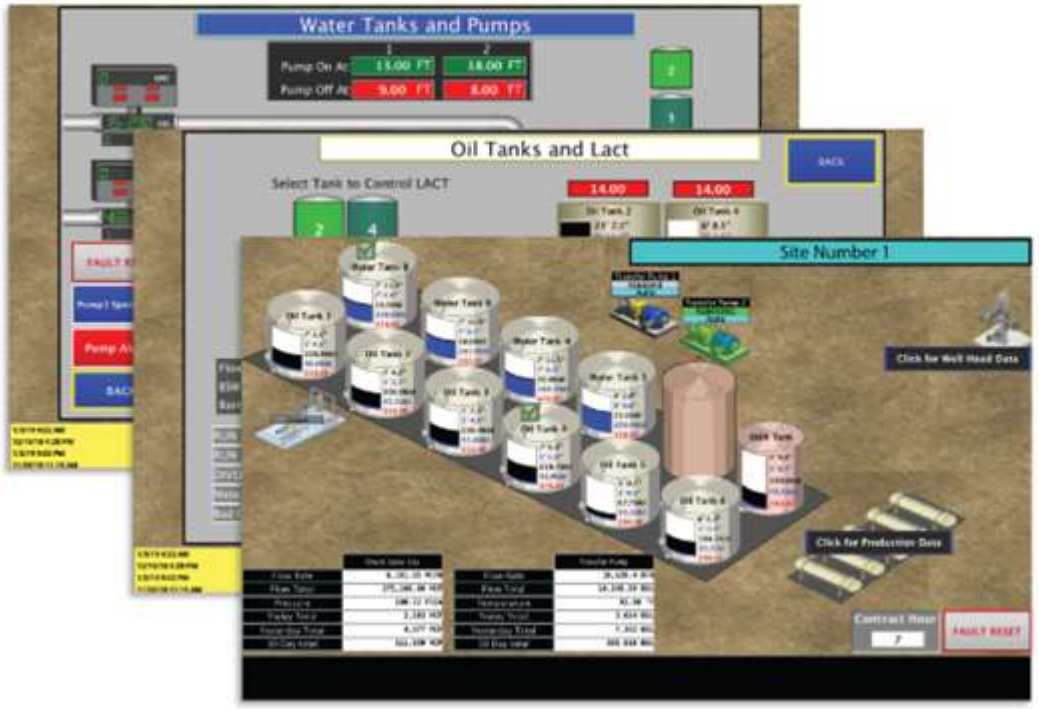
- Exhibit 1, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 2, https://tanklogix.com/vfd-controls-and-motors/.
- Exhibit 3, https://www.docs.inductiveautomation.com/docs/8.1/system-architecture/.
- Exhibit 4, https://blog.tanklogix.com/index.php/2023/02/27/alarm-status-page/.
- Exhibit 5, https://tanklogix.com/tank-monitoring/regulation-prevention.
- Exhibit 6, https://www.docs.inductiveautomation.com/docs/8.1/getting-started/.
- Exhibit 7, https://inductiveautomation.com/ignition/edge-sync-services.
- Exhibit 8, https://www.docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge/.
- Exhibit 9, https://www.docs.inductiveautomation.com/docs/8.1/ignition-module-development/perspective-components/component-events-and-actions.
- Exhibit 10, https://www.tanklogix.com/vfd-controls-and-motors/.
- Exhibit 11, https://www.tanklogix.com/.
- Exhibit 12, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 13, https://www.docs.inductiveautomation.com/docs/8.1/ignition-modules/perspective/working-with-perspective-components/component-events-and-actions.

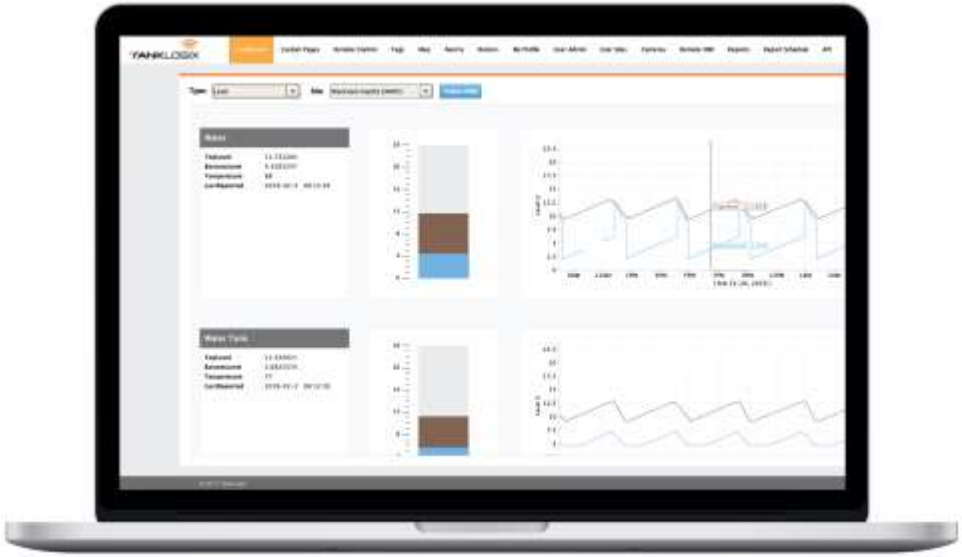
U.S. Patent No. 10,488,871	The TankLogix System
Claim 18	
[18.1] A method, comprising:	To the extent the preamble is found limiting, the Accused System performs a method as claimed. *See, e.g.*: Comprehensive Hosted SCADA TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered by 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 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.
[18.2] storing, with one or more processors, records comprising:	The Accused System stores, with one or more processors, records. *See, e.g.*: 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 1.

U.S. Patent No. 10,488,871	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.
[18.3] 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; and	The Accused System stores 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.

U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 1 (annotated). 

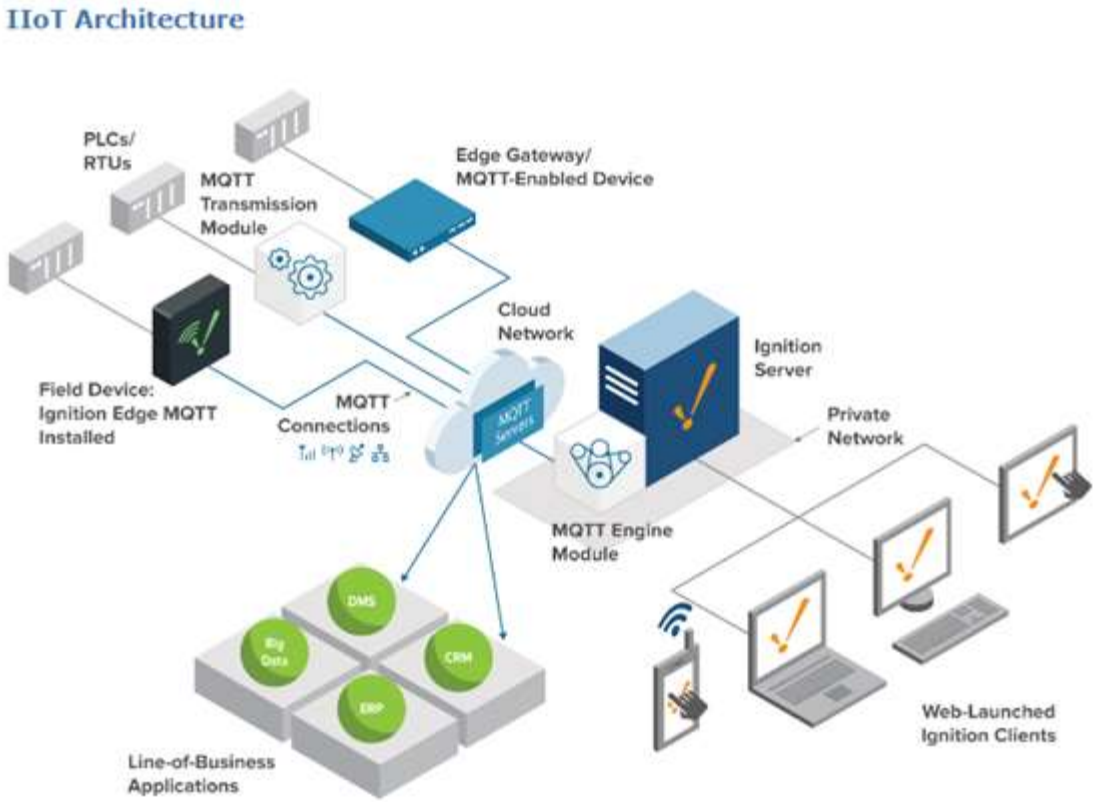
U.S. Patent No. 10,488,871	The TankLogix System
	Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.
[18.4] addresses by which industrial monitoring or control equipment at the facilities is accessible via network connections, the monitoring or control equipment including sensors configured to measure fluid handled at respective fluid-handling facilities and actuators configured to manipulate fluid flow at respective fluid-handling facilities, at least some of the fluid-handling facilities including both a plurality of the sensors and a plurality of the actuators;	The Accused System comprises addresses by which industrial monitoring or control equipment at the facilities is accessible via network connections, the monitoring or control equipment including sensors configured to measure fluid handled at respective fluid-handling facilities and actuators configured to manipulate fluid flow at respective fluid-handling facilities, at least some of the fluid-handling facilities including both a plurality of the sensors and a plurality of the actuators. *See, e.g.*:

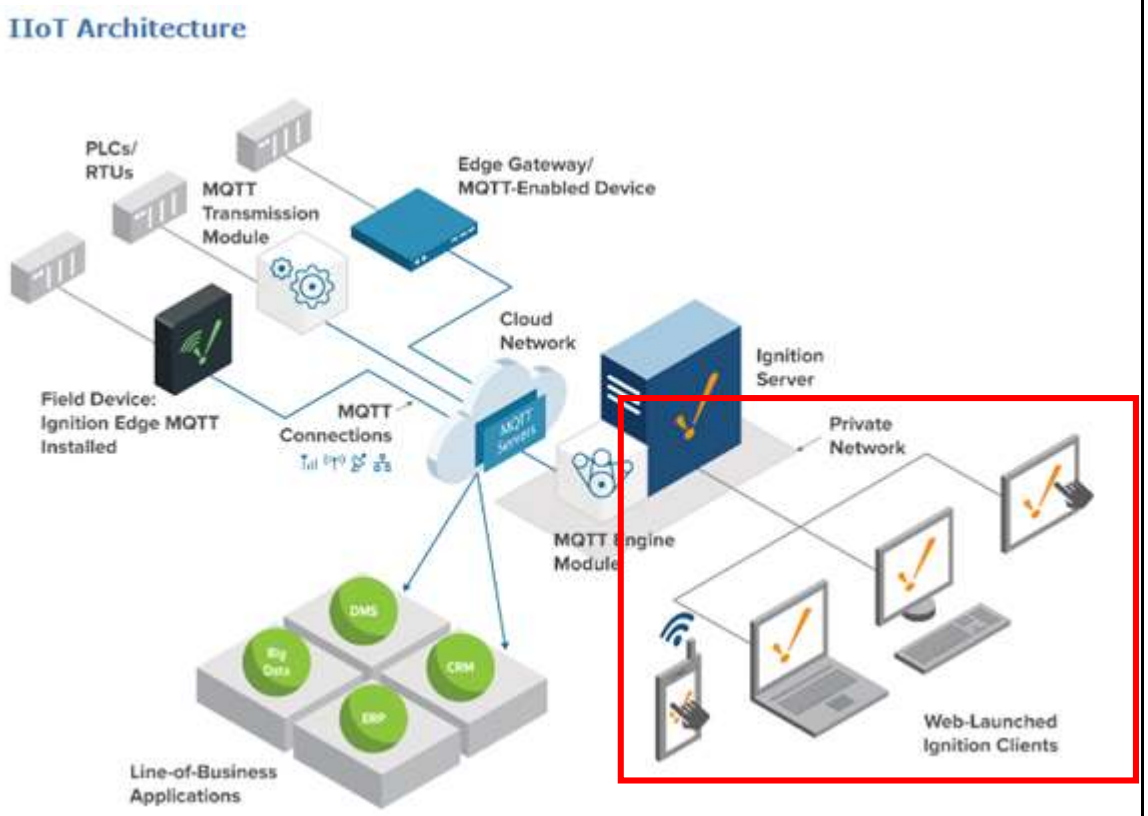
U.S. Patent No. 10,488,871	The TankLogix System
	

U.S. Patent No. 10,488,871	The TankLogix System
	

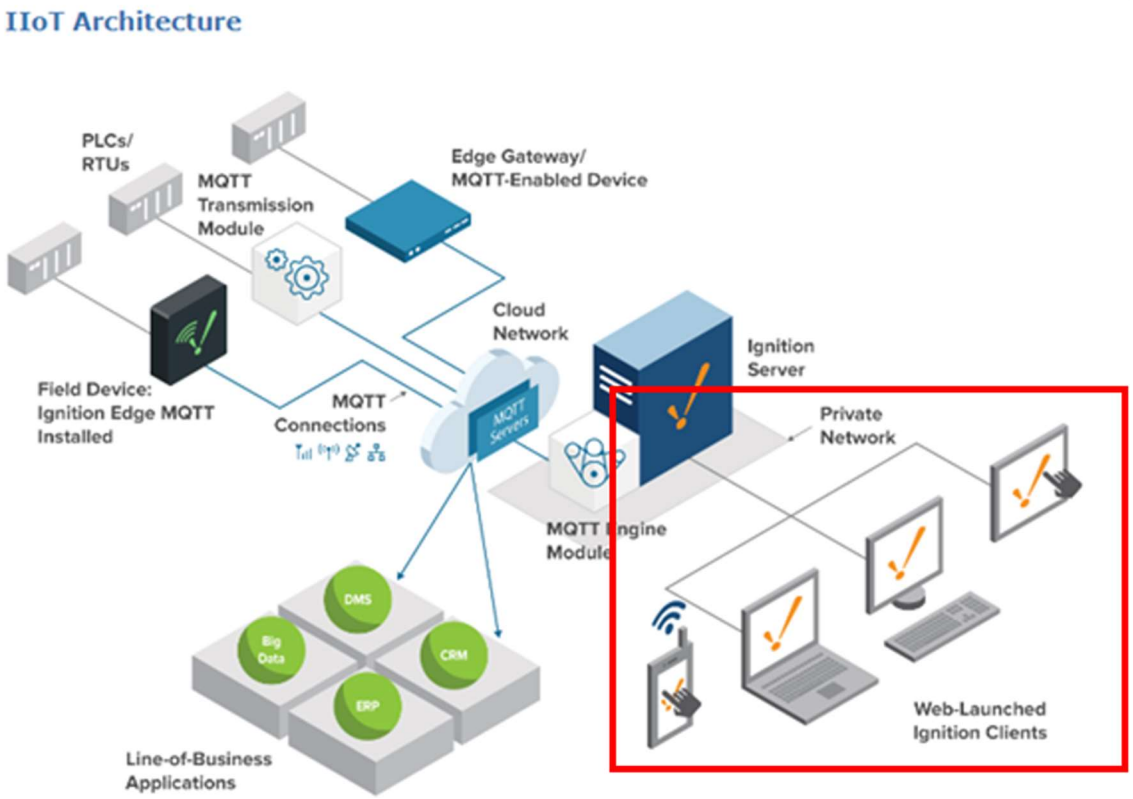
U.S. Patent No. 10,488,871	The TankLogix System
	TANKLOGIX **Produced Wastewater** This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate 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. 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 2.

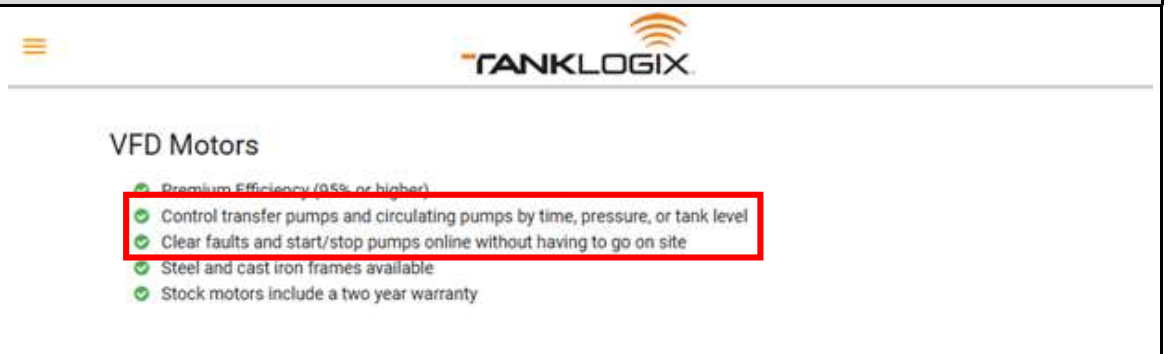
U.S. Patent No. 10,488,871	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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.
[18.5] obtaining, with one or more processors implementing a facility-interface module or modules, data from the sensors at the facilities and send commands to the actuators at the facilities via the network connections; and	The Accused System performs obtaining, with one or more processors implementing a facility-interface module or modules, data from the sensors at the facilities and send commands to the actuators at the facilities via the network connections. *See, e.g.*:

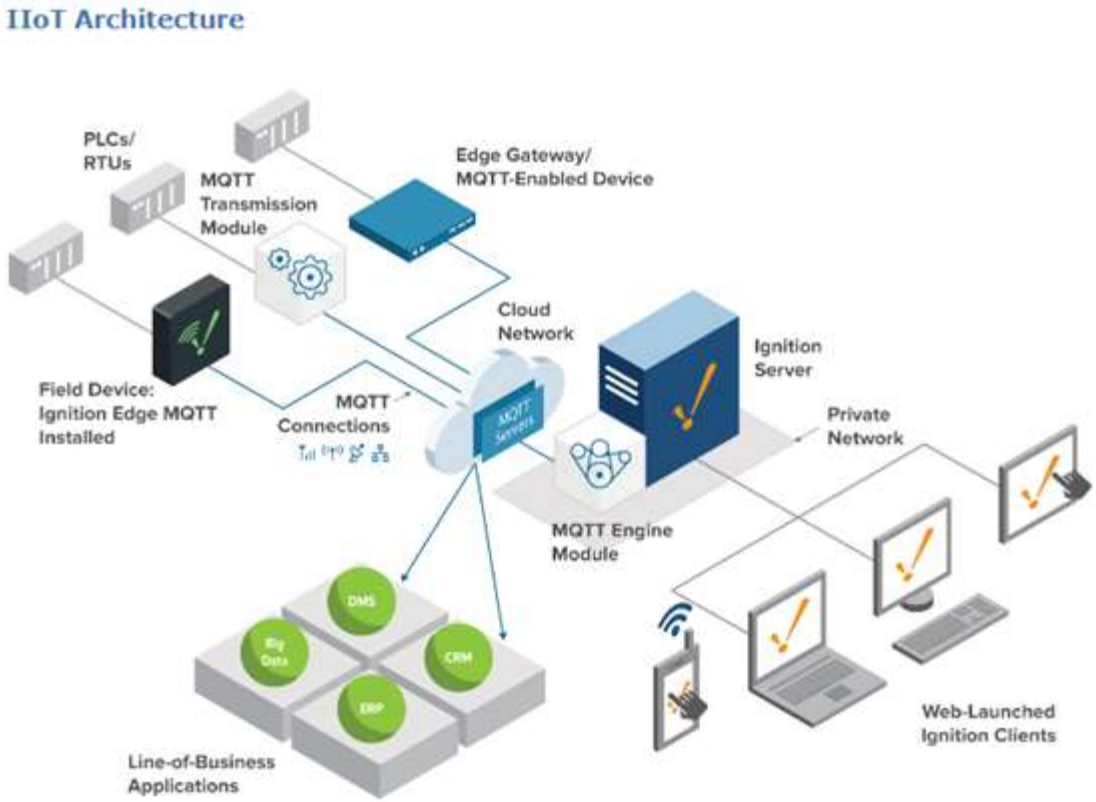
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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

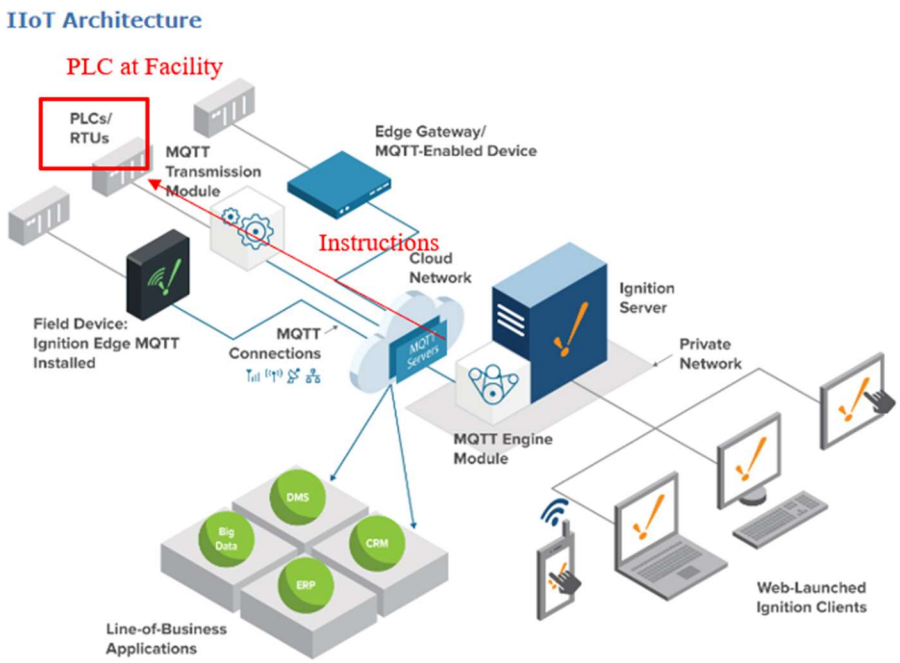
U.S. Patent No. 10,488,871	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[18.6] sending, with one or more processors implementing a user-interface module or modules, respective instructions to present respective control interfaces on respective user-computing devices logged in to respective ones of the accounts and to receive respective commands to control respective actuators from the respective user computing devices;	The Accused System performs sending, with one or more processors implementing a user-interface module or modules, respective instructions to present respective control interfaces on respective user-computing devices logged in to respective ones of the accounts and to receive respective commands to control respective actuators from the respective user computing devices. *See, e.g.*: 

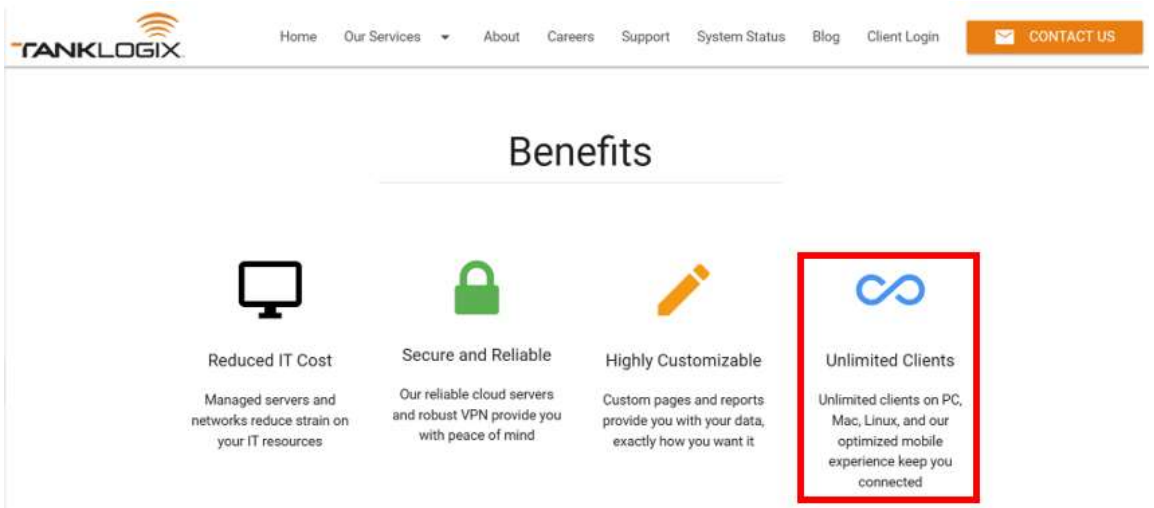
U.S. Patent No. 10,488,871	The TankLogix System
	Exhibit 12 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.
[18.7] receiving, with the user-interface module or modules, a user command to actuate an actuator entered via a presented control interface;	The Accused System performs receiving, with the user-interface module or modules, a user command to actuate an actuator entered via a presented control interface. *See, e.g.*:

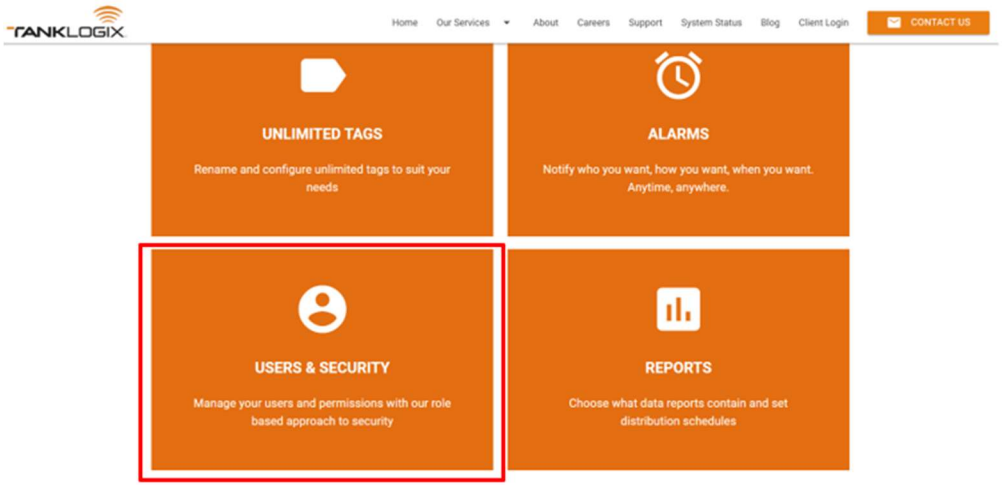
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12 (annotated).

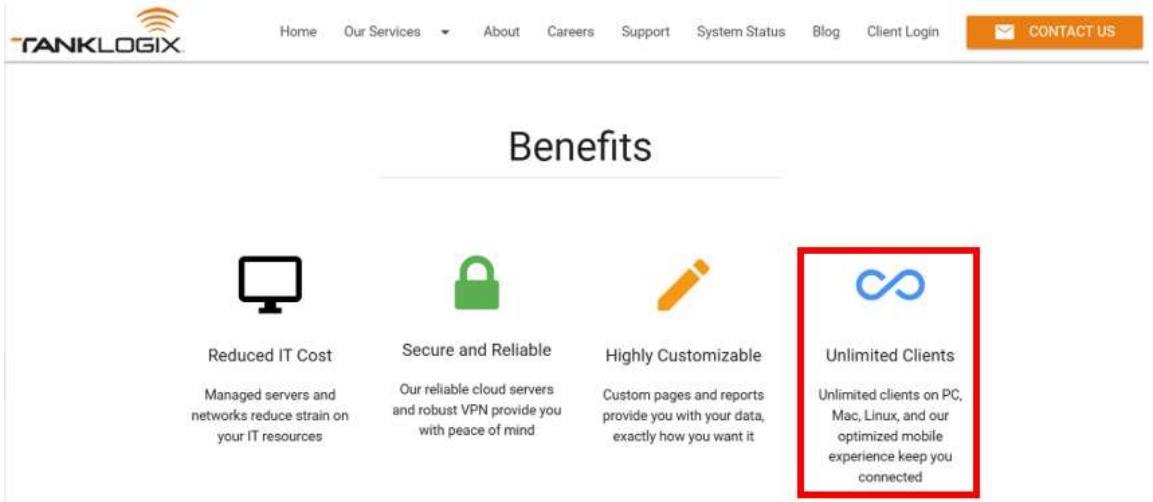
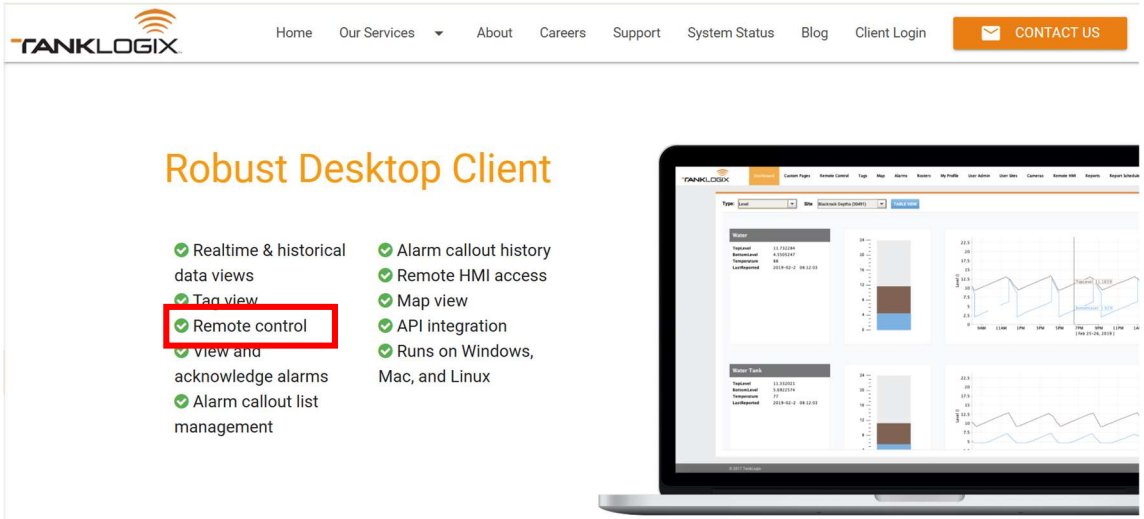
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 2 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.
[18.8] identifying, with one or more processors, in response to the user command, an address in the datastore corresponding to a facility at which the actuator is located; and	The Accused System performs identifying, with one or more processors, in response to the user command, an address in the datastore corresponding to a facility at which the actuator is located. *See, e.g.*:

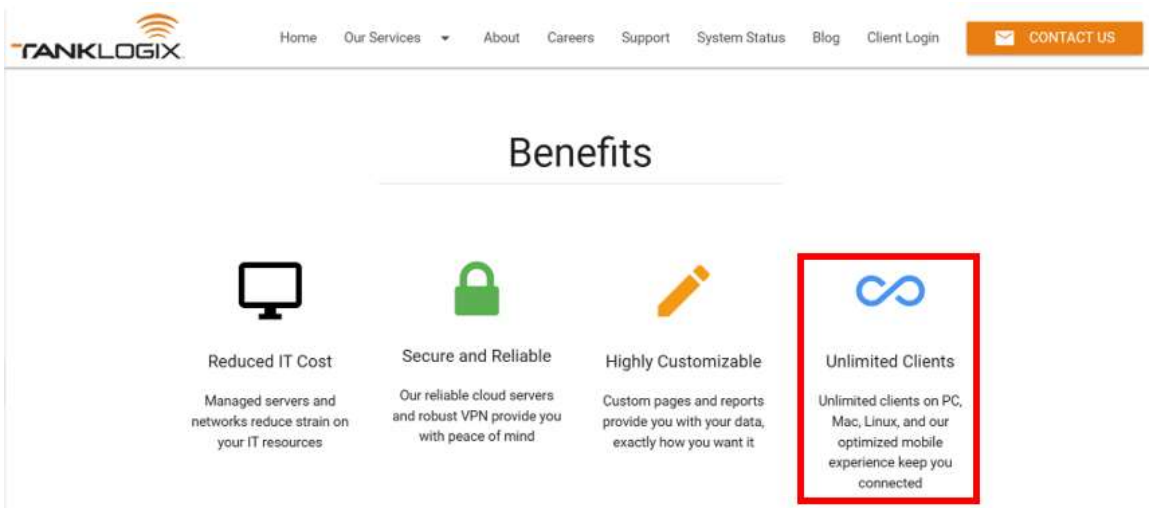
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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

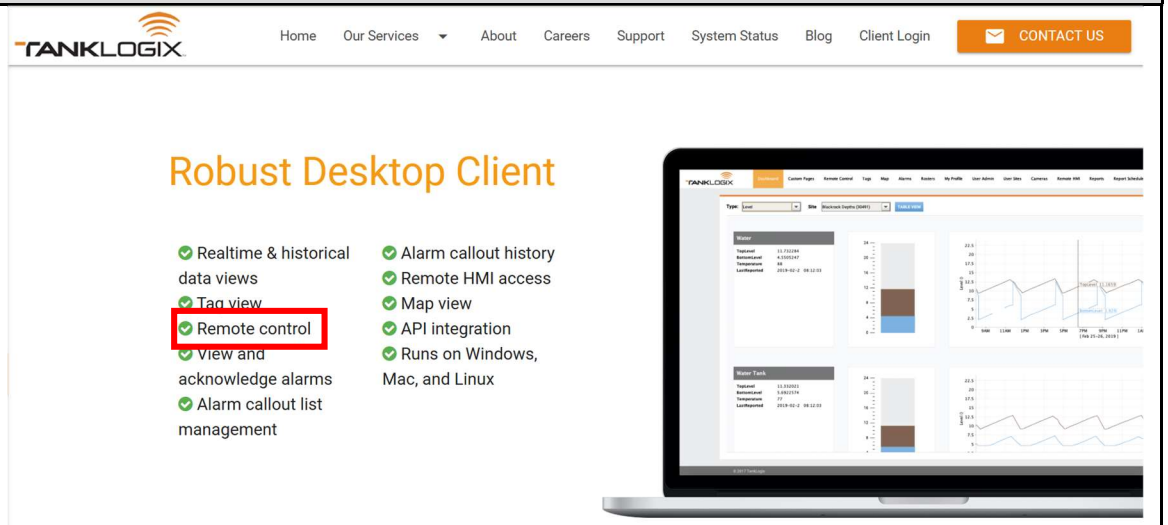
U.S. Patent No. 10,488,871	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[18.9] sending, with one or more processors, instructions with the facility-interface module or modules to the facility to actuate the actuator, wherein:	The Accused System performs sending, with one or more processors of the Ignition Server below, instructions with the facility-interface module or modules to the facility to actuate the actuator. *See, e.g.*:  Exhibit 12 (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

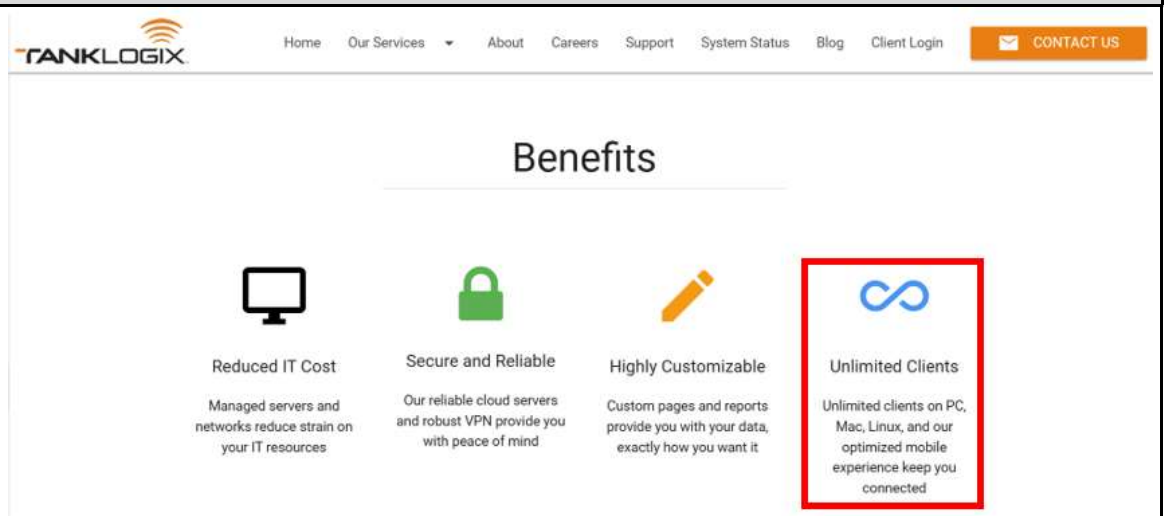
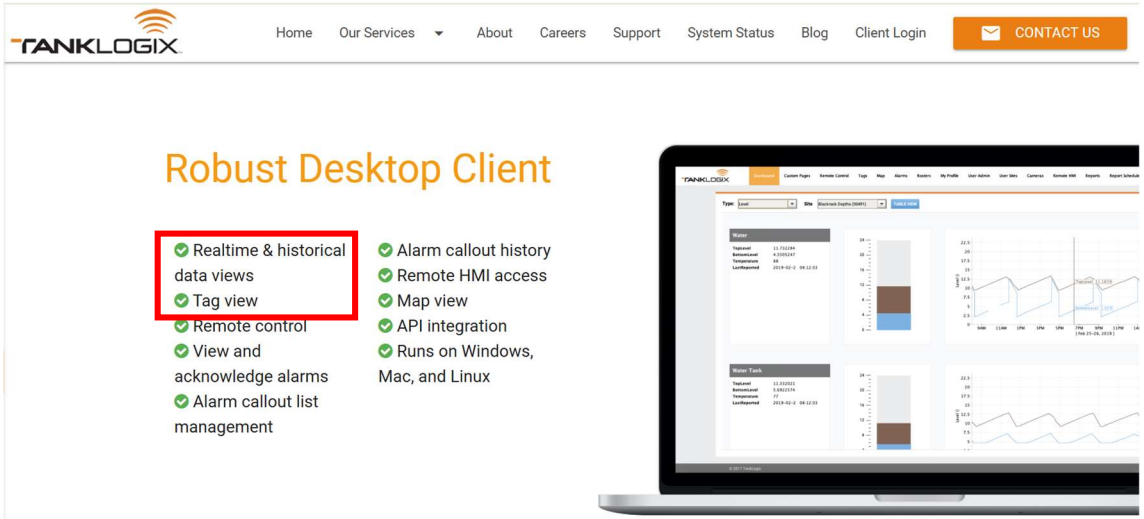
U.S. Patent No. 10,488,871	The TankLogix System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[18.10] the plurality 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.  Exhibit 1 (annotated).

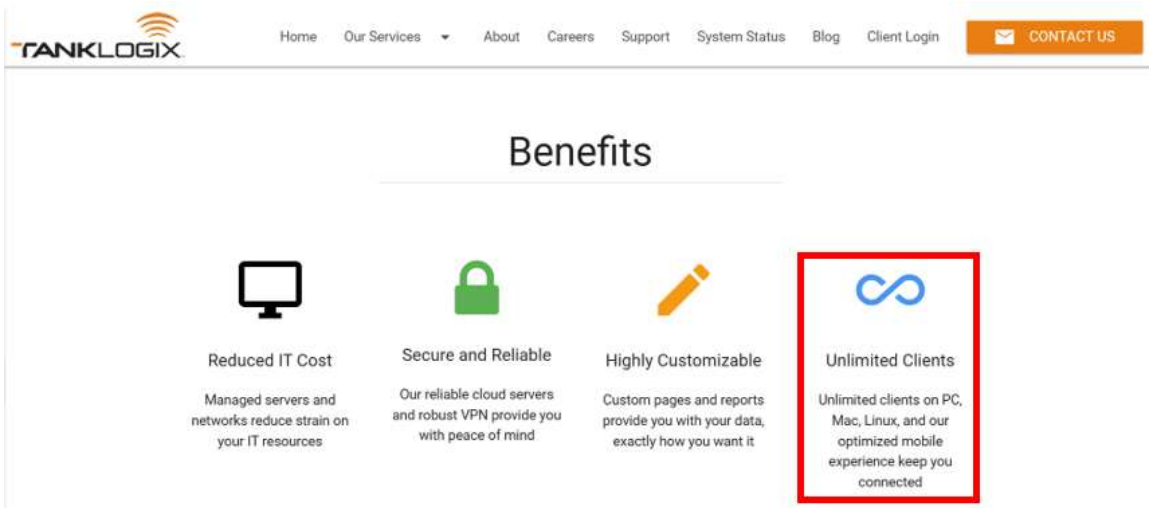
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.
[18.11] the first account corresponds to a first group of fluid-handling facilities, one or more users of the first account being authorized to send commands to remotely control fluid handling devices	In the Accused System, the first account corresponds to a first group of fluid-handling facilities, one or more users of the first account being authorized to send commands to remotely control fluid handling devices at the first group of fluid-handling facilities. *See, e.g.*:

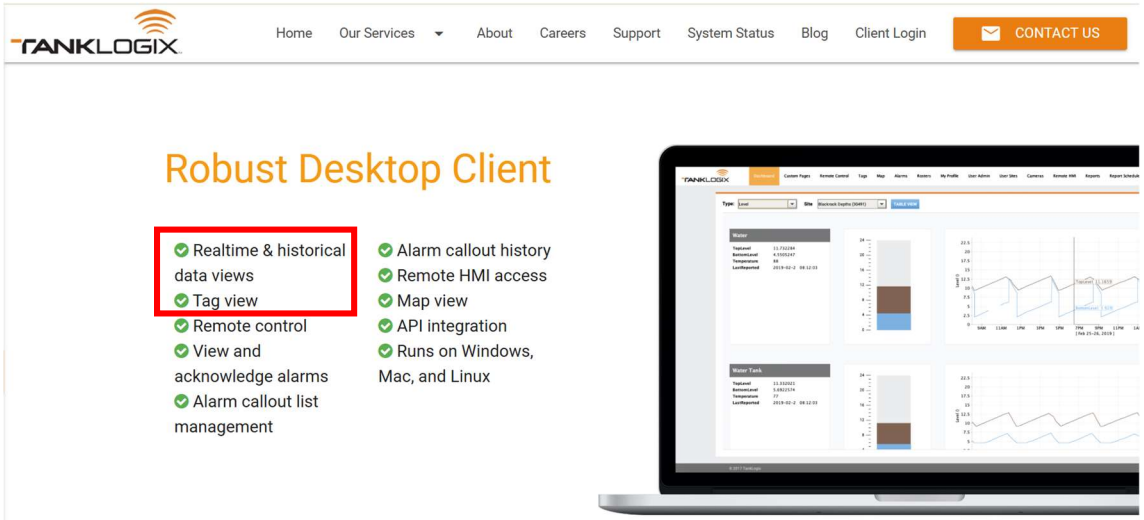
U.S. Patent No. 10,488,871	The TankLogix System
at the first group of fluid-handling facilities;	 Exhibit 1 (annotated). 

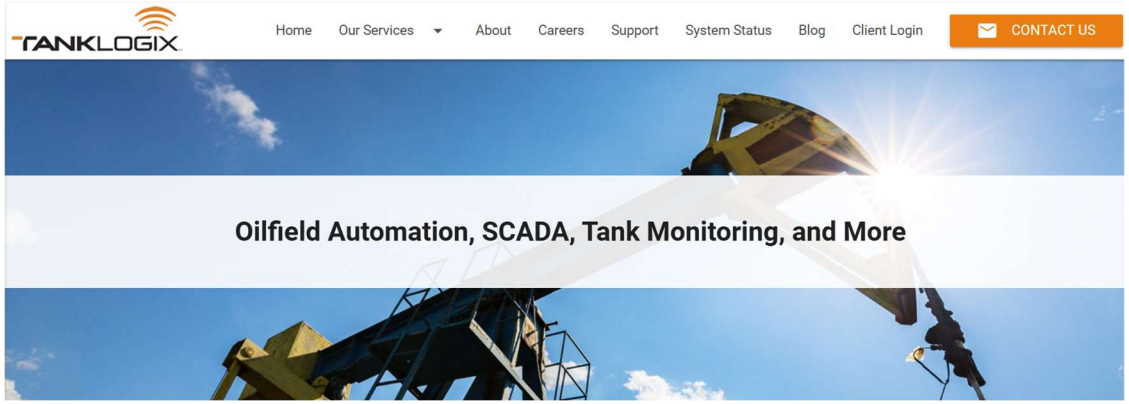
U.S. Patent No. 10,488,871	The TankLogix System
	Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.
[18.12] 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;	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.*:  Exhibit 1 (annotated).

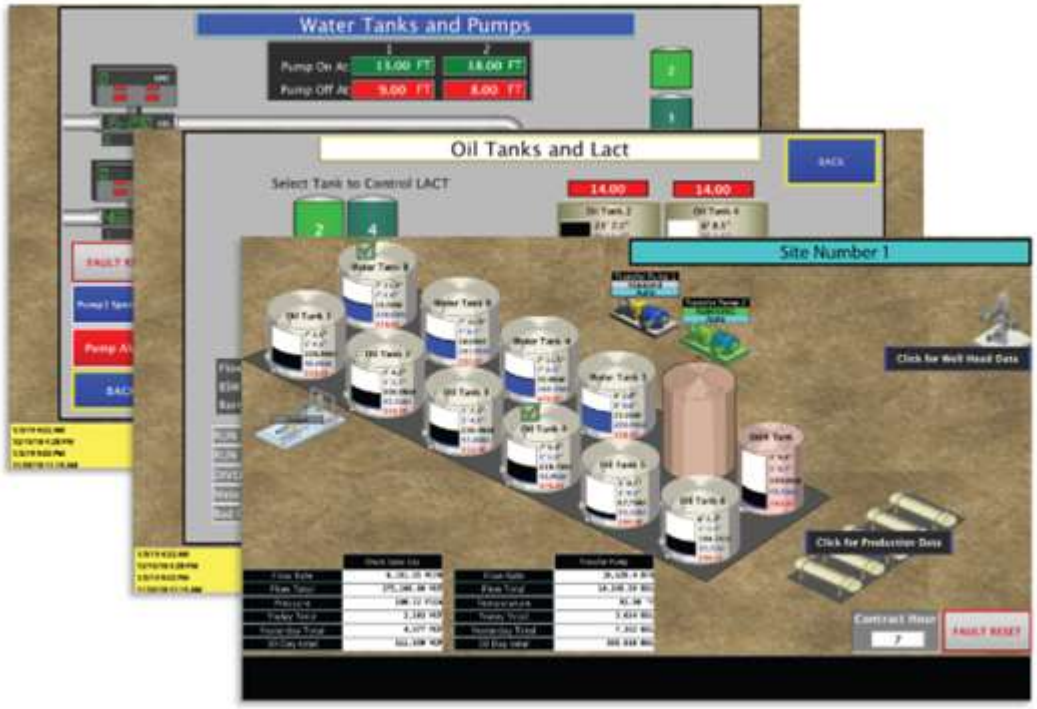
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.
[18.13] the third account corresponds to the first group of fluid-handling facilities, one or more users of the of the third account being authorized to view reports of data from fluid	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.*:

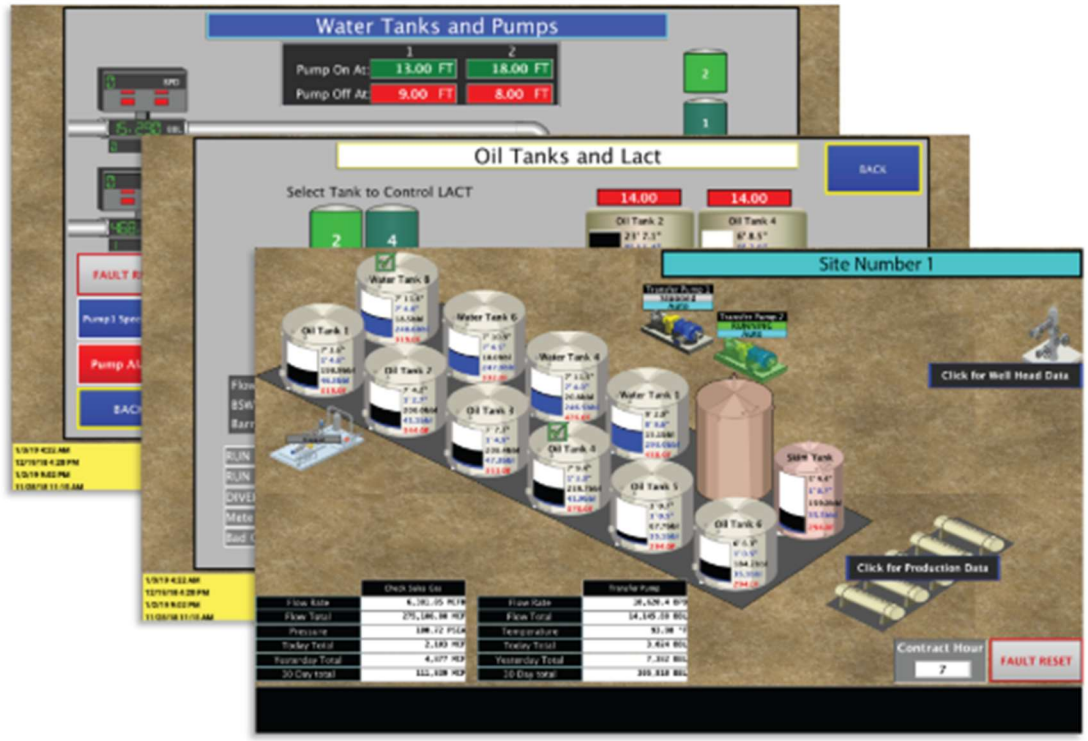
U.S. Patent No. 10,488,871	The TankLogix System
handling devices at the first group of fluid-handling facilities; and	 Exhibit 1 (annotated). 

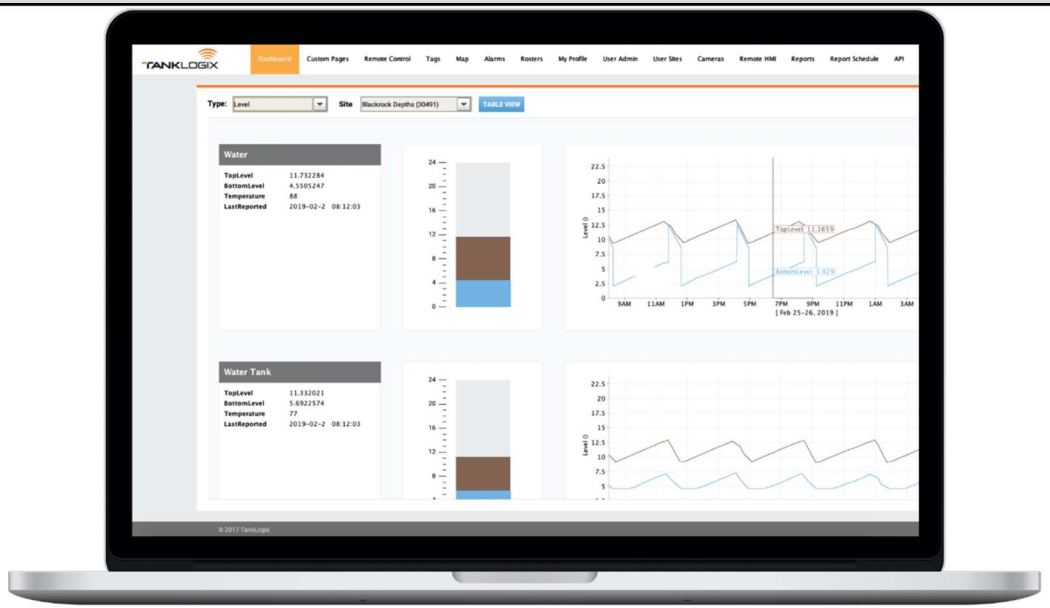
U.S. Patent No. 10,488,871	The TankLogix System
	Exhibit 1 (annotated). *See also, e.g.*, claim element 18.11 above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that 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.
[18.14] 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.	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. 10,488,871	The TankLogix System
	Exhibit 1 (annotated).  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.
Claim 19	

U.S. Patent No. 10,488,871	The TankLogix System
[19.1] The method of claim 18, wherein: at least some of the fluid-handling facilities are oil-or-gas related fluid-handling facilities and include petro-water disposal facilities or re-injection facilities; and	In the system of the Accused System, at least some of the fluid-handling facilities are oil-or-gas related fluid-handling facilities and include petro-water disposal facilities or re-injection facilities. *See, e.g.*: *See* claim 18 above.  Exhibit 11.

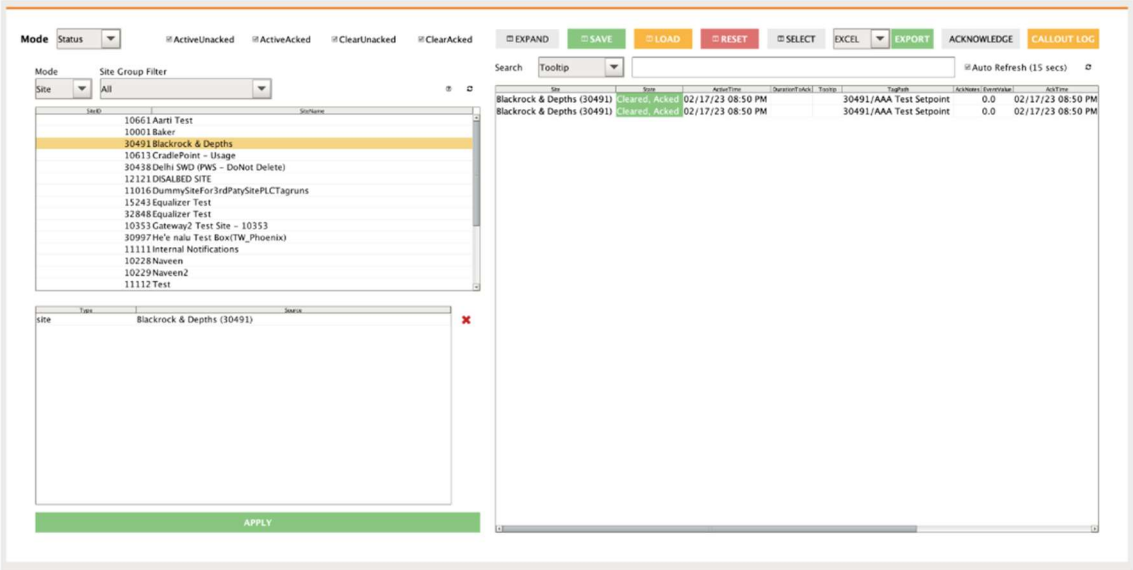
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 1. For example, the image above shows a petro-water disposal facility. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a 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. 10,488,871	The TankLogix System
[19.2] 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.	The Accused System comprises sensors that 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. *See, e.g.*: 

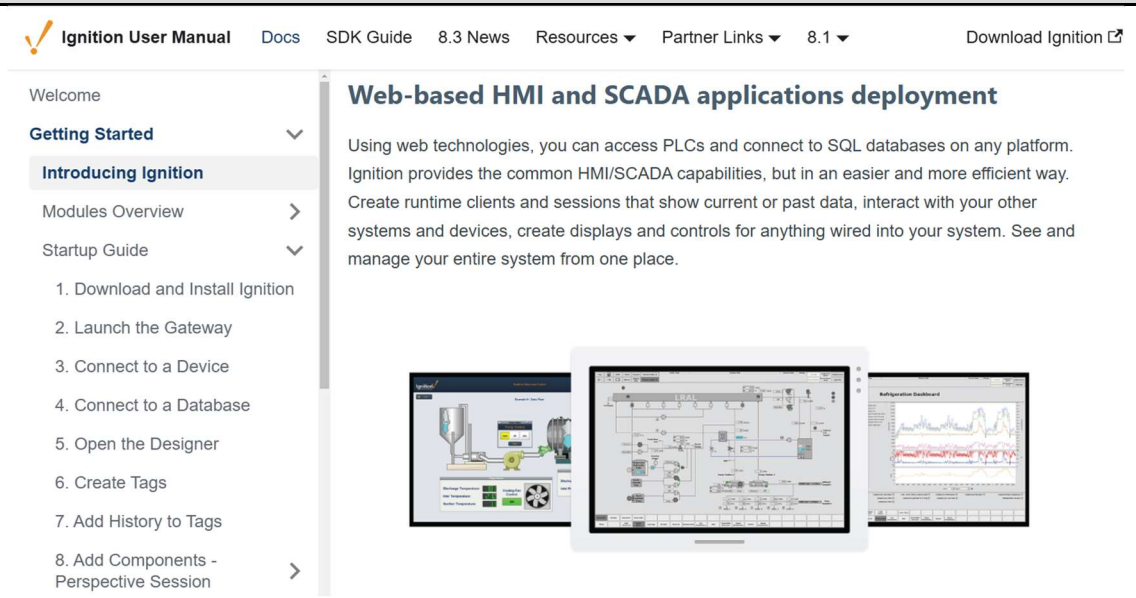
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 1. The above figures depict tank level measurements retrieved from sensors in the Accused System, including level measurements indicating where oil meets water. These data records associate the tanks with the facility (e.g., "Site Number 1"). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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.

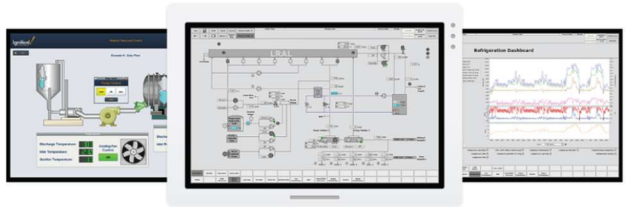
U.S. Patent No. 10,488,871	The TankLogix System
Claim 20	
[20.1] The method of claim 18, wherein: the sensors include a tank level sensor of a tank at one of the facilities;	The Accused System comprises a tank level sensor of a tank at one of the facilities. *See, e.g.*: *See* claim 18 above. *See, e.g.*, claim element 19.2 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.
[20.2] the datastore includes a record associating the tank with the facility, data from the tank being unavailable to users without an account associated with the tank; and	The datastore of the Accused System includes a record associating the tank with the facility, data from the tank being unavailable to users without an account associated with the tank. *See, e.g.*: *See, e.g.*, claim element 19.2 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.

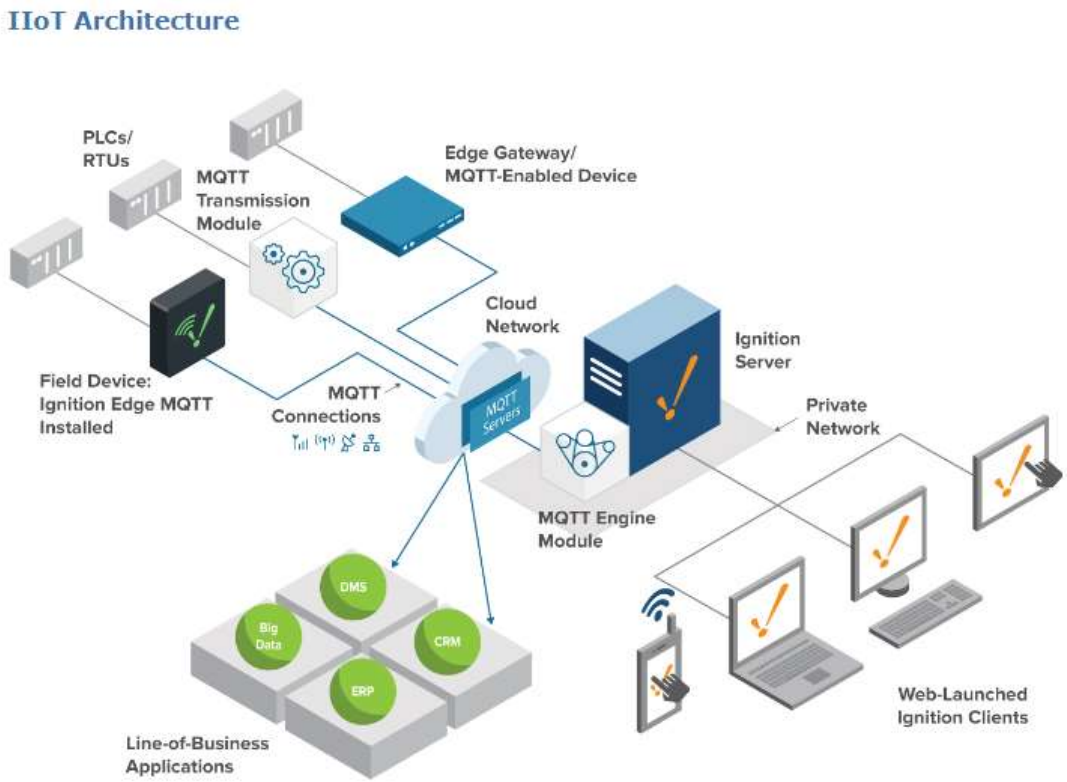
U.S. Patent No. 10,488,871	The TankLogix System
[20.3] the accounts designate a plurality of fluid-handling facilities to which a given user is authorized to send user commands to actuate actuators.	The accounts of the Accused System designate a plurality of fluid-handling facilities to which a given user is authorized to send user commands to actuate actuators. *See, e.g.*: Custom Pages Tailored to Fit • Collaborate with our designers • Recreate HMI screens • Combine data across sites • Custom graphics and images • Alarm management • Remote control • Custom security options • 2D and 3D isometric graphics • Available in desktop client Exhibit 1 (annotated).

U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 4. The above images show the accounts designate a plurality of fluid-handling facilities (e.g., "SiteName" or "Site") to which a given user is authorized to send user commands to actuate actuators. 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 21	

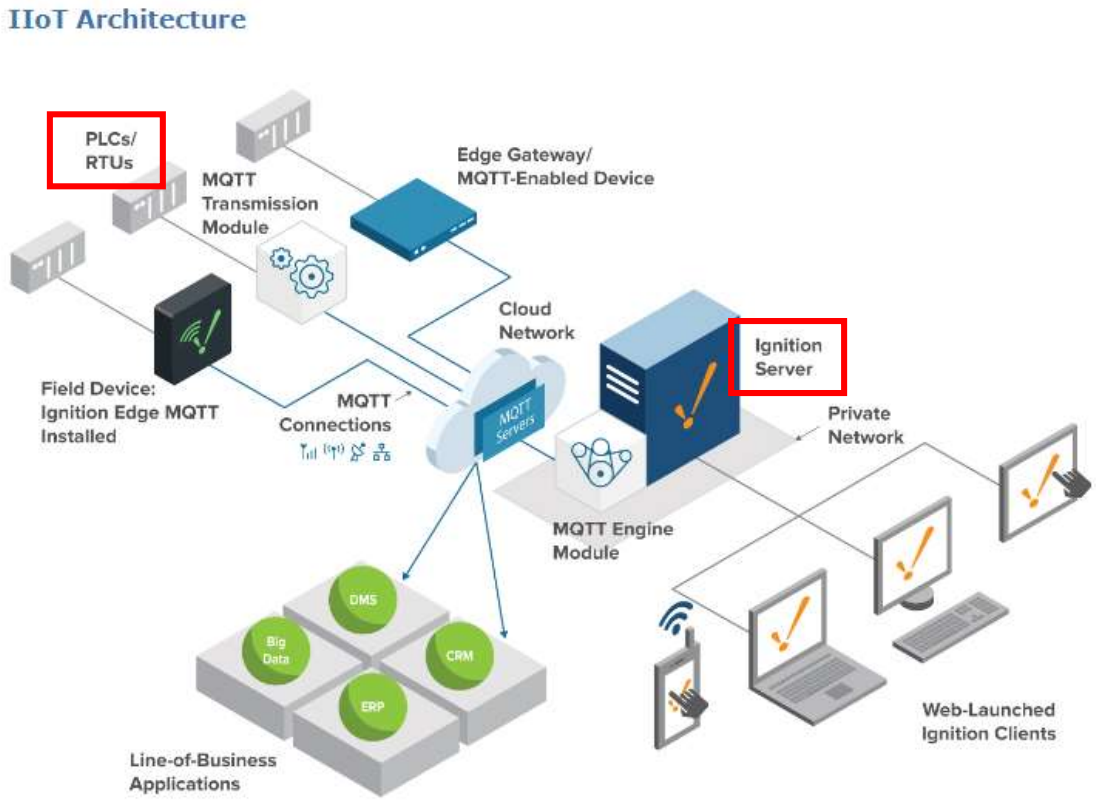
U.S. Patent No. 10,488,871	The TankLogix System
[21.1] The method of claim 18, wherein the sensors include: a level sensor of a tank at a given one of the facilities and wherein the datastore includes a record associating the tank with the given facility; and	The Accused System includes a level sensor of a tank at one of the facilities and wherein the datastore includes a record associating the tank with the given facility. *See, e.g.*: *See* claim 18 above. *See, e.g.*, claim element 19.2 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.
[21.2] a leak detector at the given facility, and wherein the datastore includes a record associating the leak detector with the given facility.	The Accused System includes a leak detector at the given facility, and wherein the datastore includes a record associating the leak detector with the given facility. *See, e.g.*: 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.

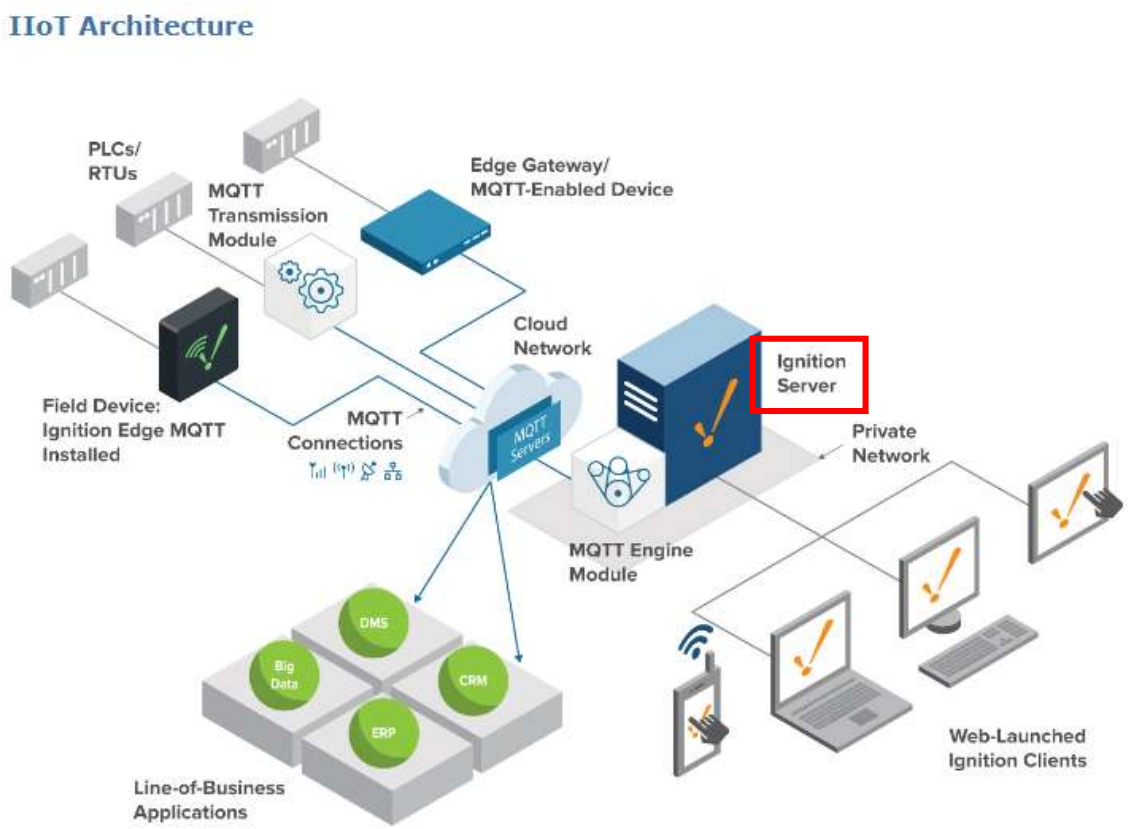
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 6. As described in the example above, the Accused System includes a leak detector at its facilities. The Accused System also includes a datastore, as shown below:

U.S. Patent No. 10,488,871	The TankLogix System
	Ignition User Manual Docs SDK Guide 8.3 News Resources Partner Links 8.1 Download Ignition 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 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 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 has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 22	

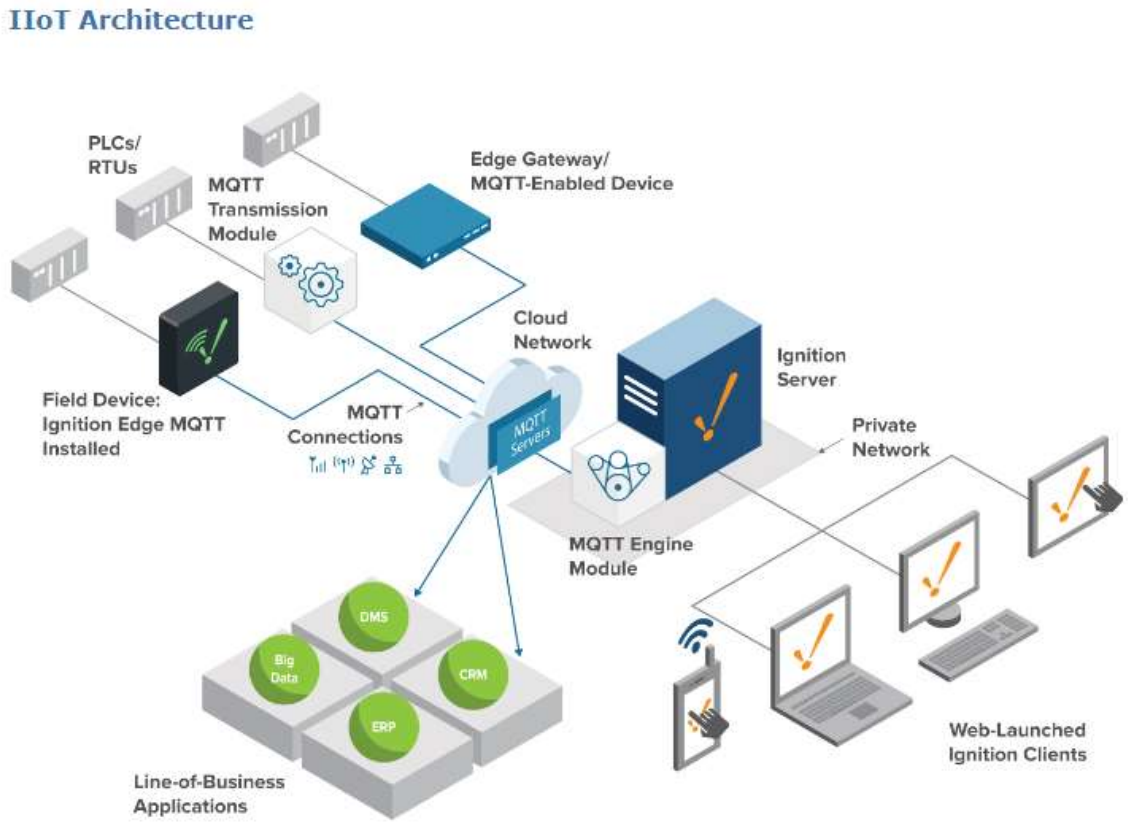
U.S. Patent No. 10,488,871	The TankLogix System
[22.1] The method of claim 18, wherein: the user-interface module or modules comprises a web server; and	In the Accused System, the user-interface module or modules comprises a web server. *See, e.g.*: *See* claim 18 above. The web server is, e.g., the Ignition Server, which is used by the Web-Launched Ignition Clients shown by the schematic below.  Exhibit 12.

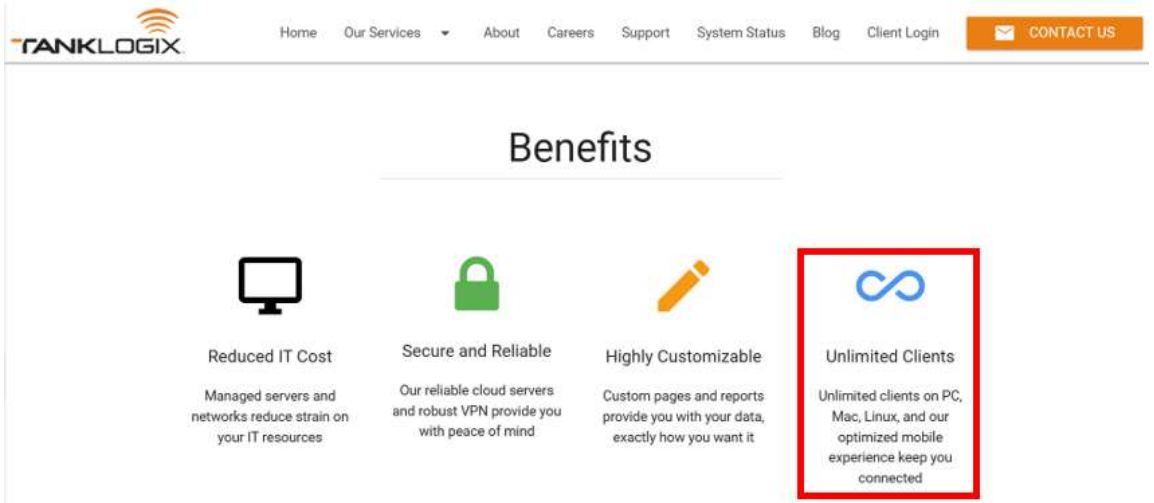
U.S. Patent No. 10,488,871	The TankLogix System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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.
[22.2] the facility-interface module or modules comprises a site server distinct from the web server;	In the Accused System, a facility-interface module or modules comprises a site server distinct from the web server. *See, e.g.*: In the Accused System, the facility-interface module or modules comprises a site server distinct from the web server. The site server (e.g., the Ignition Server shown by the schematic below) is distinct from the web server (e.g., Ignition Edge module or PLC).

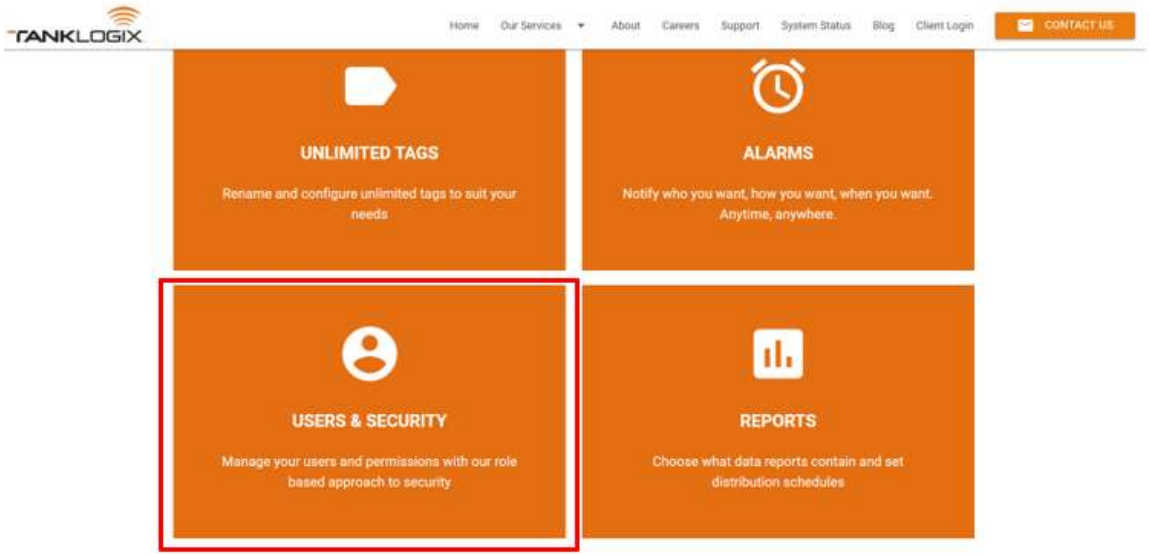
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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

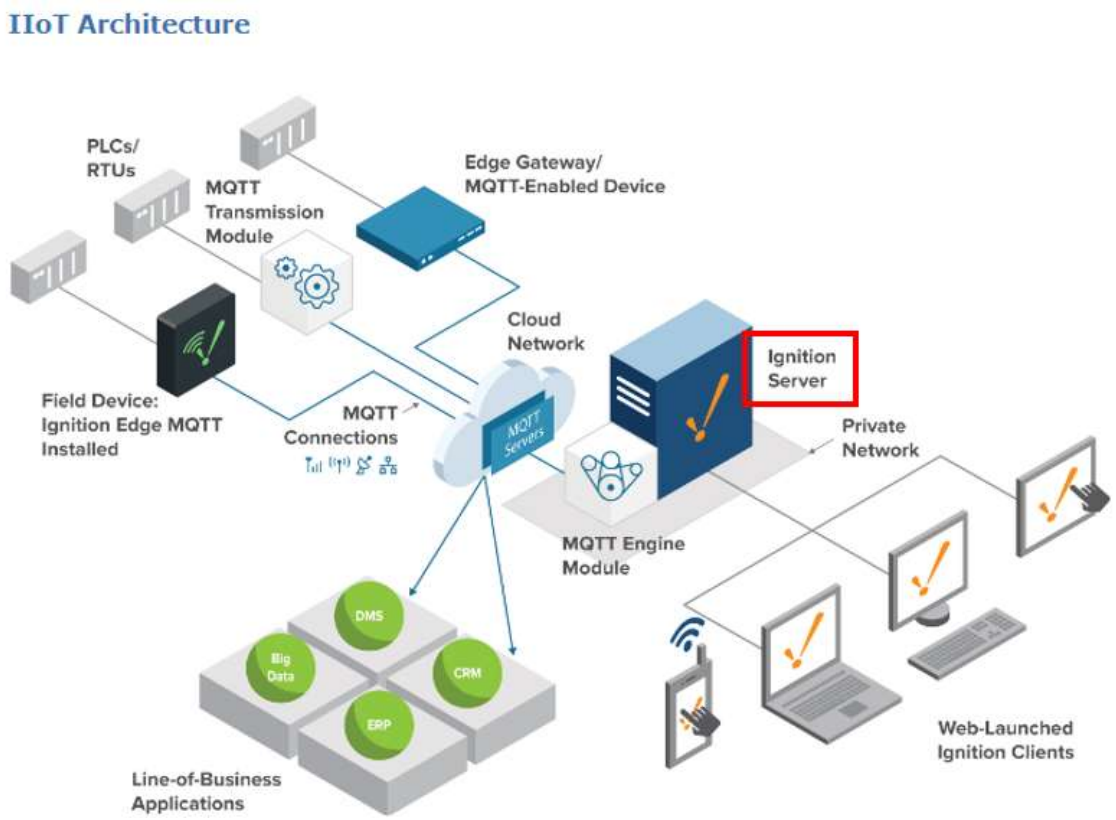
U.S. Patent No. 10,488,871	The TankLogix System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[22.3] the web server is configured to communicate with user devices via a first network port of a computing device executing the web server;	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.*:  Exhibit 12.

U.S. Patent No. 10,488,871	The TankLogix System
	The Ignition Server depicted above is configured to communicate 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 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.
[22.4] the site server is configured to communicate with facilities via a second network port of the computing device, the second network port being different from the first network port; and	In the Accused System, the site server communicates with facilities via a second network port of the computing device, wherein the second network port is different from the first network port. *See, e.g.*:

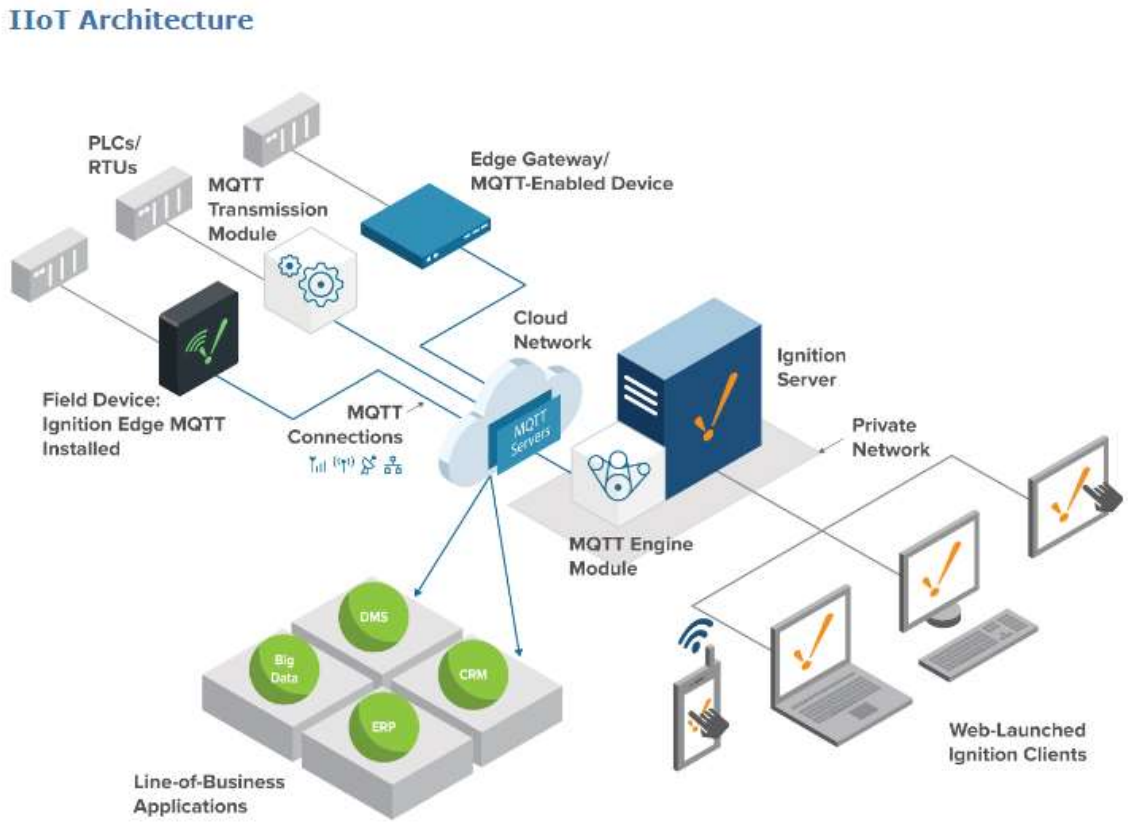
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12. As shown in the above schematic, the site server (e.g., PLC or Ignition Edge module) communicates with facilities via a network port distinct from the one used by the Ignition Server to communicate with client devices. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a

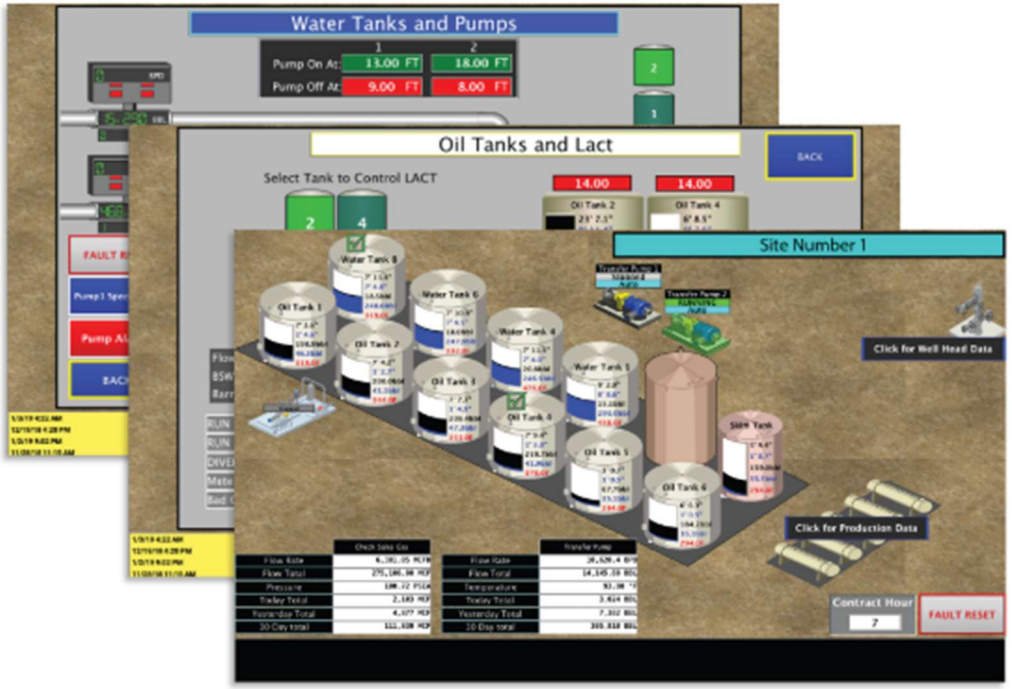
U.S. Patent No. 10,488,871	The TankLogix System
	manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[22.5] the data store is configured to store subscription information associated with at least some of the accounts.	The data store of the Accused System is configured to store subscription information associated with at least some of the accounts. *See, e.g.*:  Exhibit 1 (annotated).

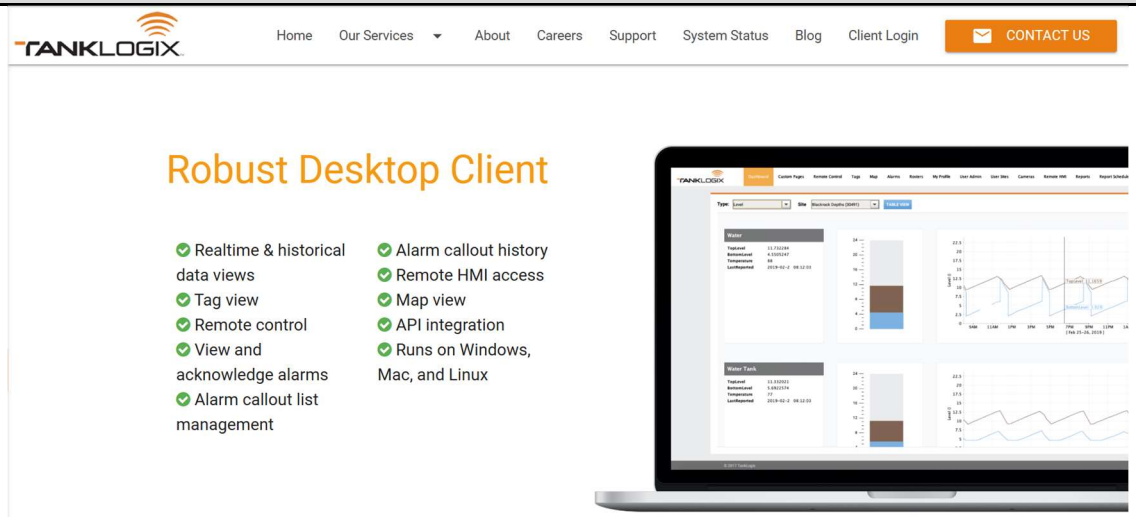
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 1 (annotated). On information and belief, the Accused System stores subscription information associated with user accounts in order to provide access to user site and device information on the Accused System. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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 23	

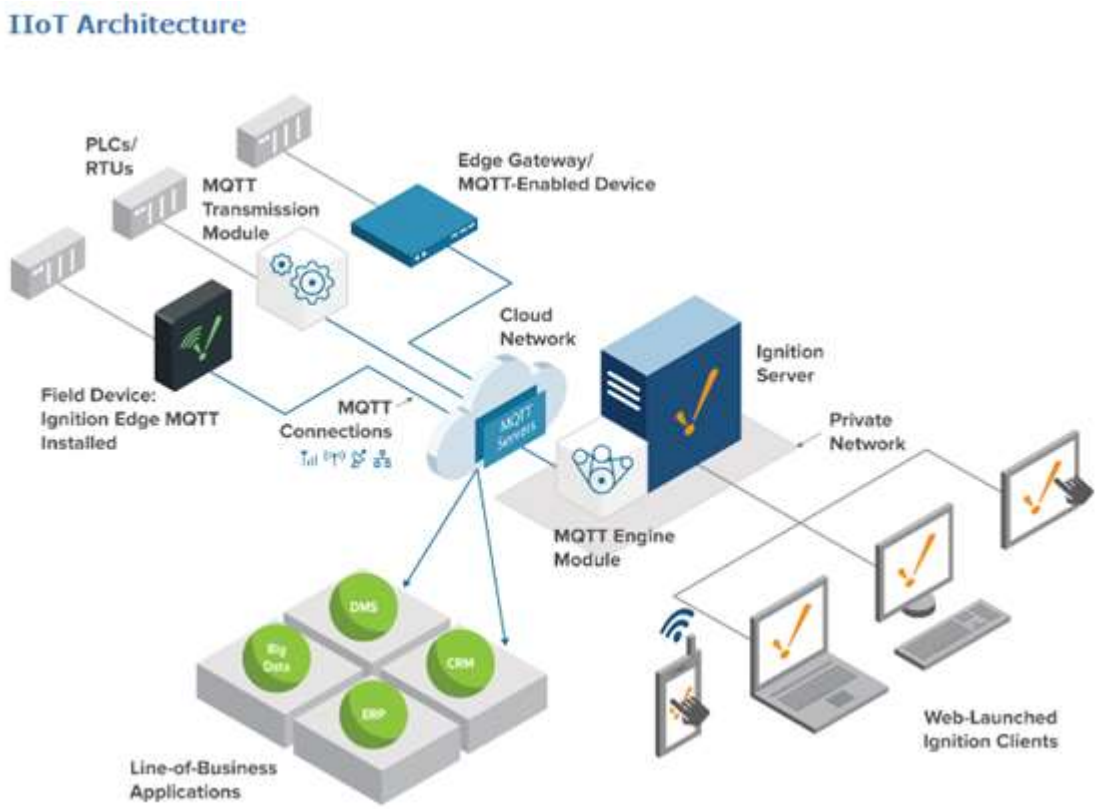
U.S. Patent No. 10,488,871	The TankLogix System
[23.1] The method of claim 18, comprising: steps for interfacing with a plurality of site controllers associated with the facilities; and	The Accused System performs steps for interfacing with a plurality of site controllers associated with the facilities. *See, e.g.*: *See* claim 18 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. 

U.S. Patent No. 10,488,871	The TankLogix System
	Exhibit 12 (annotated). *See also* claim element 18.4 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.
[23.2] steps for sending instructions to present a control interface on the user devices.	The Accused System performs steps for sending instructions to present a control interface on the user devices. *See, e.g.*:

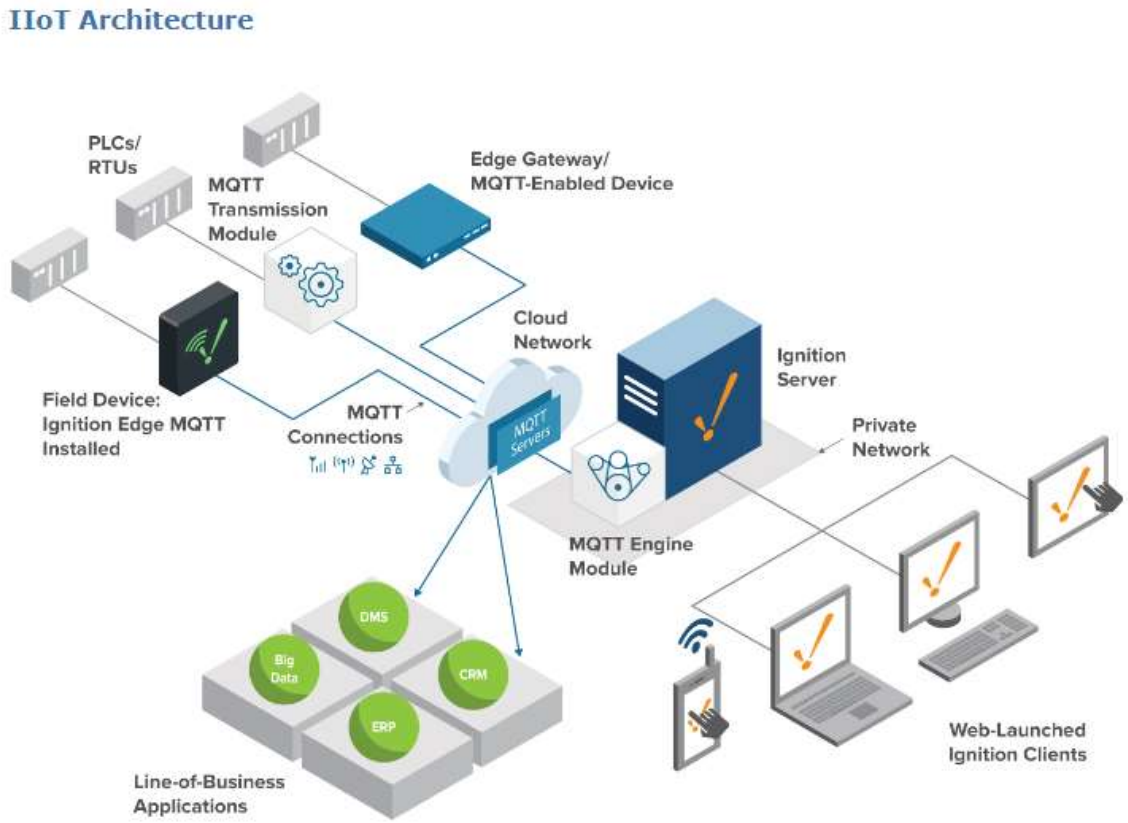
U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12.

U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 1.

U.S. Patent No. 10,488,871	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 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 24	

U.S. Patent No. 10,488,871	The TankLogix System
[24] The method of claim 18, wherein the datastore stores accounts for more than one thousand facilities, and the user-interface module or modules are configured interface with more than one thousand user devices.	In the Accused System, the datastore stores accounts for more than one thousand facilities, and the user-interface module or modules are configured interface with more than one thousand user devices. *See, e.g.*: *See* claim 18 above. The web-interface module or modules are configured to interface with more than one hundred user devices. 

U.S. Patent No. 10,488,871	The TankLogix System
	Exhibit 12. On information and belief, the Accused System comprises more than one thousand facilities and more than one thousand 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 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 25	
[25] The method of claim 18, 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 18 above. The Ignition Server shown by the schematic below includes a facility-interface module or modules.

U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12. 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 18.4 above.

U.S. Patent No. 10,488,871	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.
Claim 26	
[26.1] The method of claim 18, comprising instantiating at least three of the following as distinct threads from one another:	The Accused System instantiates at least three threads as distinct threads from one another. *See, e.g.*: *See* claim 18 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 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. 10,488,871	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.
[26.2] a thread configured to sends and receive data requests;	The Accused System includes a thread configured to sends and receive data requests. *See, e.g.*: *See also, e.g.*, claim element 26.2 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 • 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 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.
[26.3] 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.*:

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	# 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 Exhibit 7. ## 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 one week data limit. The Edge Gateway will still only see the one week of data that it can hold internally, but it will allow you to store the data in a more permanent database that can be viewed from other Ignition systems. **Note:** Before data can be synchronized across gateways, the remote gateway's remote system (History Provider, Audit Profile, or Alarm Journal Profile) must be configured to accept remote storage under Service Security via the "Query and Storage" option. Exhibit 8.

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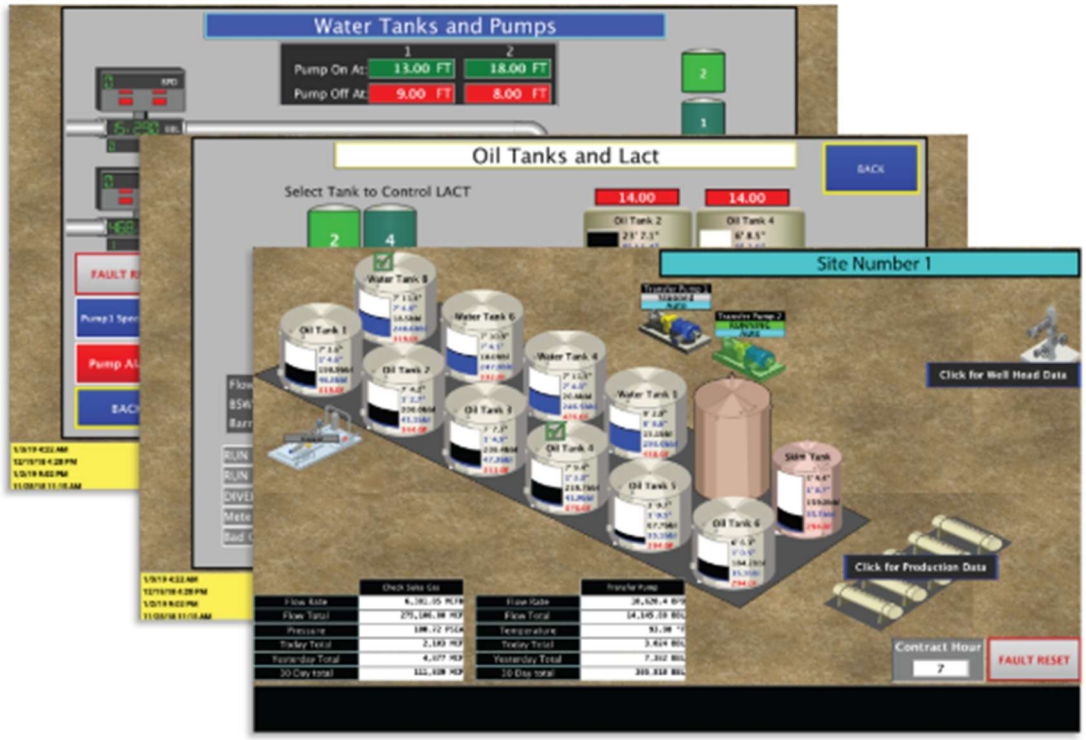
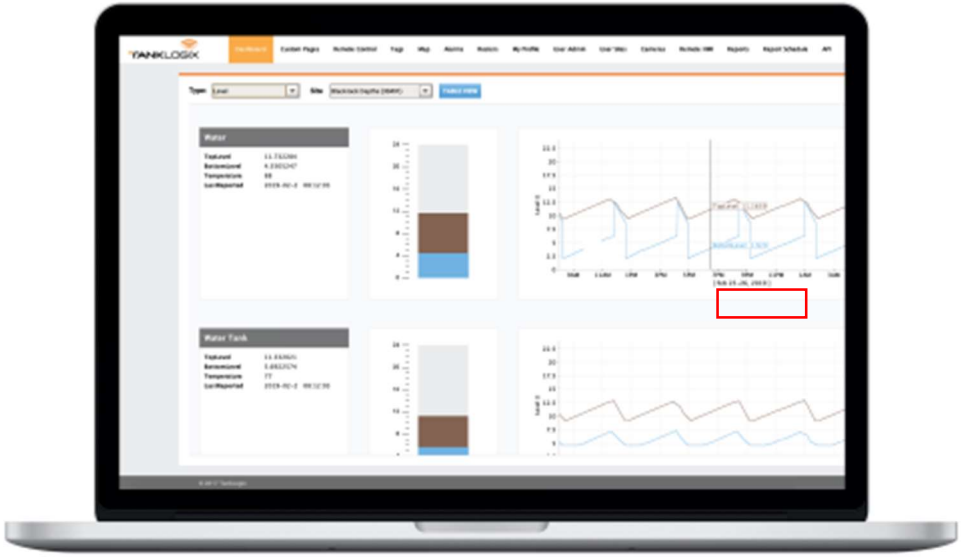
	As described above, at least the Ignition Gateway performs data synchronization tasks, which operate to synchronize other threads with updated information. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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.
[26.4] 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 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. 10,488,871	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.
[26.5] 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, for example: • Ignition Server • Ignition Gateway • User devices • Fluid-handling devices • PLCs • Ignition Edge modules

U.S. Patent No. 10,488,871	The TankLogix System
	

U.S. Patent No. 10,488,871	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.
[26.6] a thread configured to process user interactions; and	The Accused System includes a thread configured to process user interactions. *See, e.g.*: The Accused System includes several components that instantiate threads to process user interactions, including:

U.S. Patent No. 10,488,871	The TankLogix System
	• Ignition Server • Ignition Gateway • User devices • Fluid-handling devices • PLCs • Ignition Edge modules

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	# 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 13.
	
	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

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	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.
[26.7] 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 • Fluid-handling devices • PLCs • Ignition Edge modules 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 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. 10,488,871	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 27	
[27.1] The method of claim 18, comprising instantiating each and every of the following as distinct threads from one another:	The Accused System performs instantiating each and every of the following as distinct threads from one another. *See, e.g.*: *See* claim 18 above. *See, e.g.*, claim element 26.1 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.
[27.2] a thread configured to sends or receive data request;	The Accused System includes a thread configured to sends and receive data requests. *See, e.g.*: *See, e.g.*, claim element 26.2 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.

U.S. Patent No. 10,488,871	The TankLogix System
[27.3] 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.*: *See, e.g.*, claim element 26.3 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.
[27.4] 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.*: *See, e.g.*, claim element 26.4 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.
[27.5] a thread configured to obtain updated sensor readings;	The Accused System includes a thread configured to obtain updated sensor readings. *See, e.g.*: *See, e.g.*, claim element 26.5 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

U.S. Patent No. 10,488,871	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.
[27.6] a thread configured to process user interactions; and	The Accused System includes a thread configured to process user interactions. *See, e.g.*: *See, e.g.*, claim element 26.6 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.
[27.7] 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.*: *See, e.g.*, claim element 26.7 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.
Claim 28	

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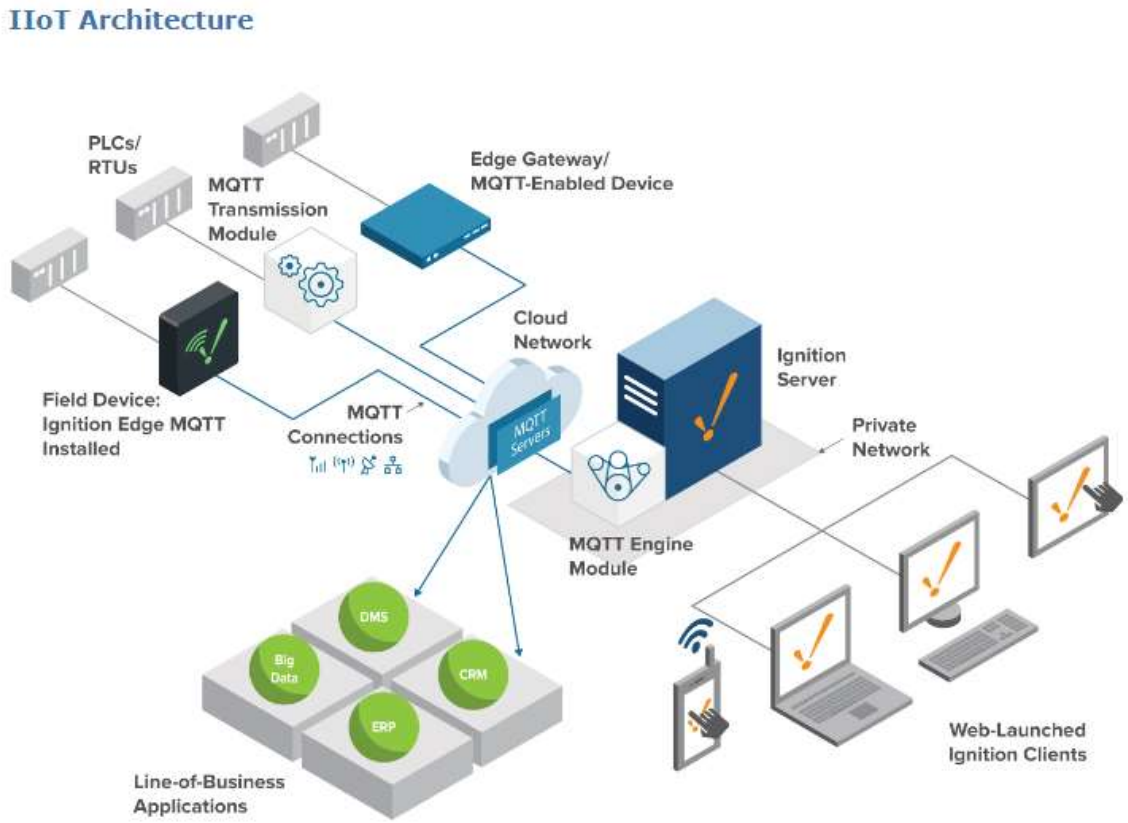
[28] The method of claim 18, comprising: communicating, with a controller at one of the facilities, with an actuator or a sensor to actuate the actuator or read from the sensor.	The Accused System performs communicating, with a controller at one of the facilities, with an actuator or a sensor to actuate the actuator or read from the sensor. *See, e.g.*: *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 has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 29	
[29] The method of claim 28, wherein the controller is communicatively coupled to the actuator and the sensor via a private local area network, and wherein controller is communicatively coupled to the actuator or sensor via a frame-based carrier-sense multiple access protocol with collision detection.	The controller of the Accused System is communicatively coupled to the actuator and the sensor via a private local area network, and wherein 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 28 above.

U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12. The controller (e.g., PLC) is coupled to sensor and actuator at each facility via local networks, including by private local area networks. On information and belief, 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

U.S. Patent No. 10,488,871	The TankLogix System
	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 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 30	
[30] The method of claim 28, comprising buffering data from sensors with the controller and pushing, with the controller, buffered data to the facility-interface module or modules.	The Accused System performs buffering data from sensors with the controller and pushing, with the controller, buffered data to the facility-interface module or modules shown by the schematic below. *See, e.g.*: *See* claim 28 above. The Ignition Server shown by the schematic below includes controller (e.g., PLC) which pushes buffered data to a facility-interface module or modules.

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	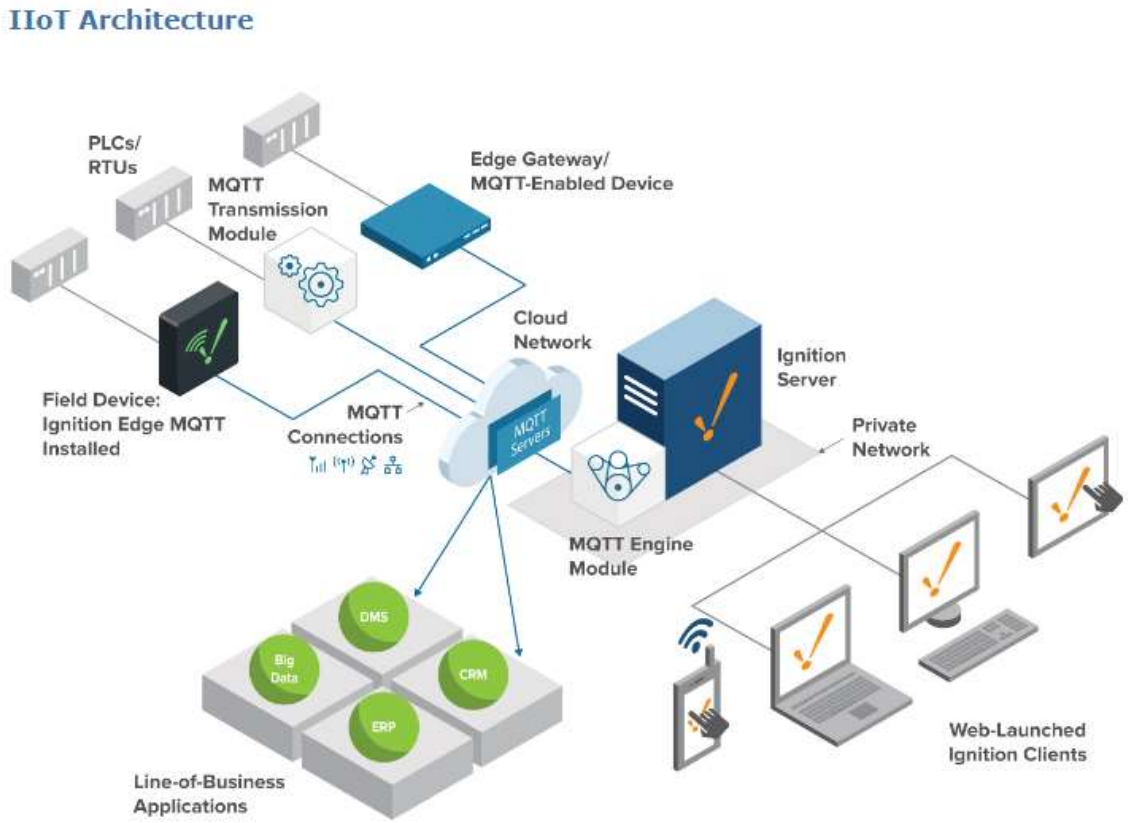 Exhibit 12. The PLCs and/or Ignition Edge modules at each facility buffer data collected from devices at each site, and push buffered data stored at the facilities to the facility-interface module or modules. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a

U.S. Patent No. 10,488,871	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 31	
[31] The method of claim 28, comprising: steps for ensuring at least some data is not lost if network access ceases intermittently.	The Accused System performs steps for ensuring at least some data is not lost if network access ceases intermittently. *See, e.g.*: *See* claim 28 above.

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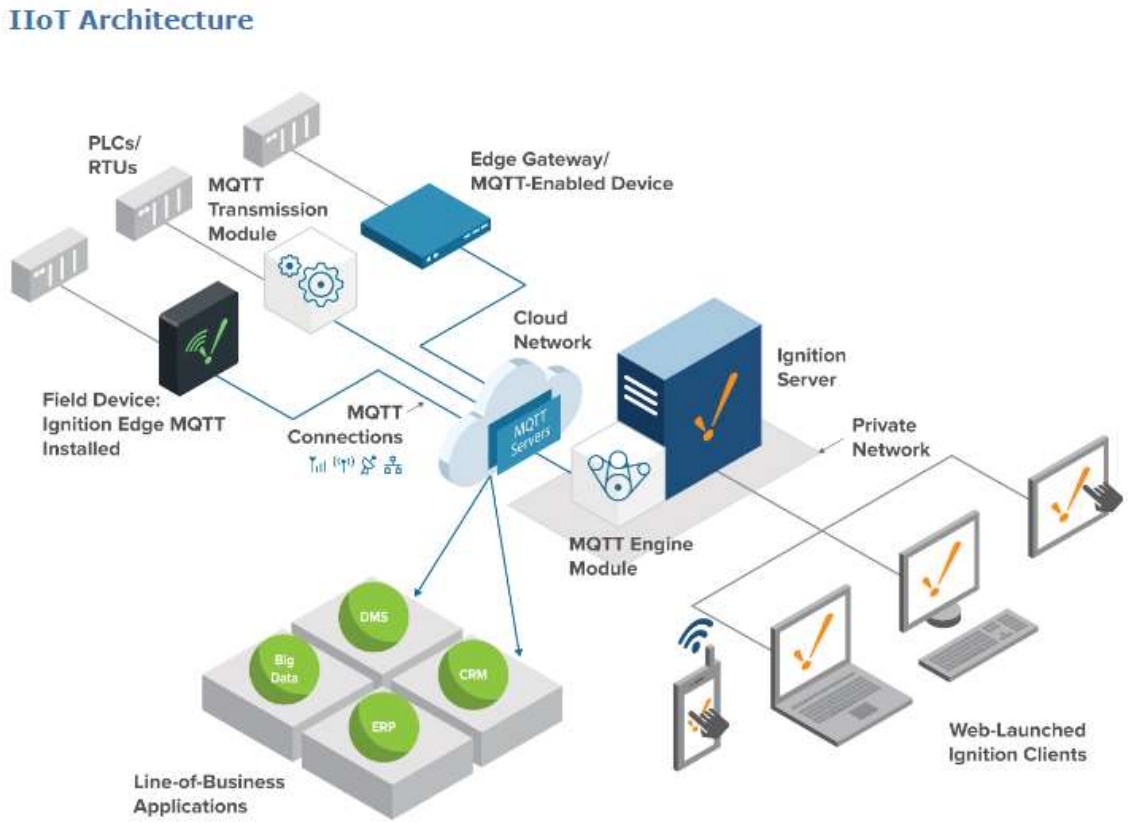
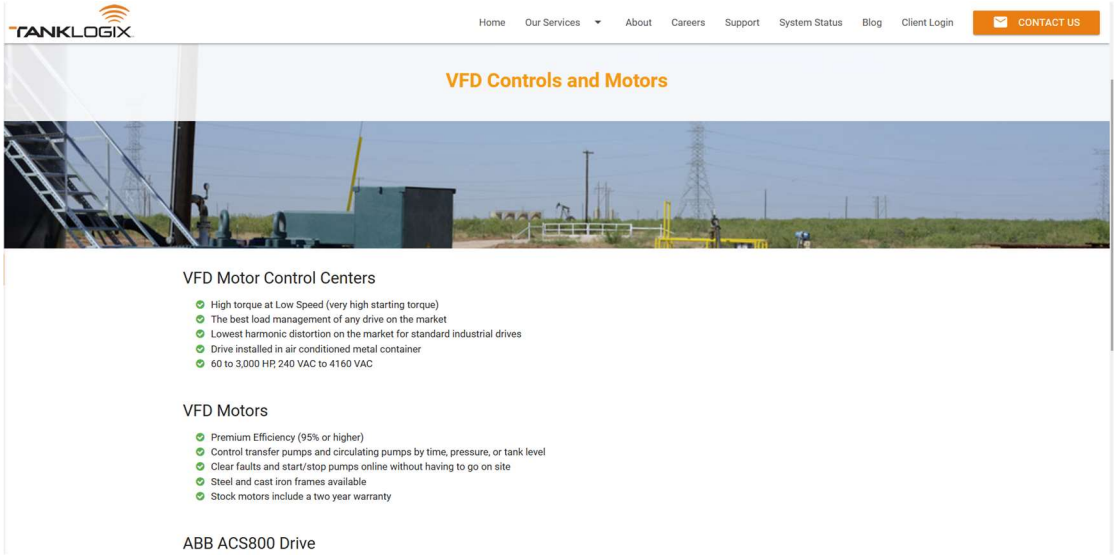
	 Exhibit 12. For example, the PLCs in the schematic above buffer data in case of a network outage, which is then synchronized to the Ignition Gateway once connectivity is restored. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a

U.S. Patent No. 10,488,871	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 32	
[32.1] The method of claim 28, comprising: steps for translating a command for an actuator from an input format to a format configured to effectuate changes in the actuator;	The Accused System performs steps 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 28 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:  Exhibit 10.

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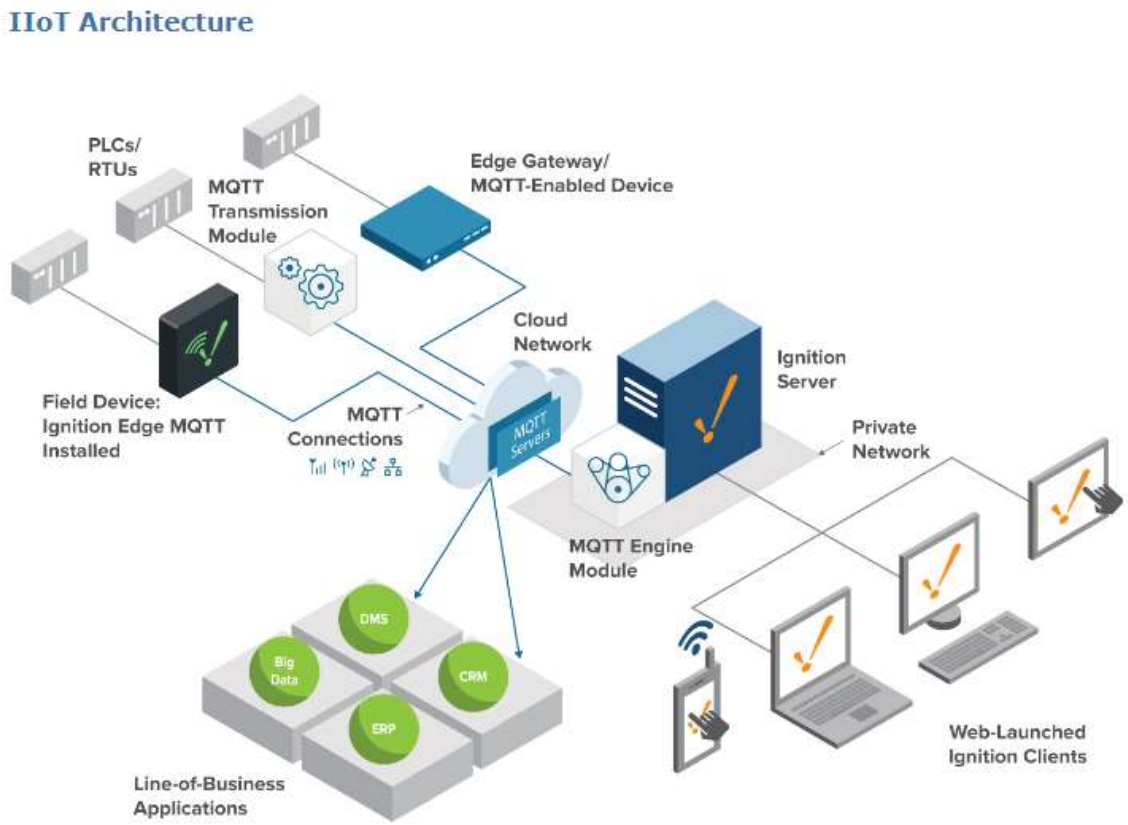
	On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices. As shown in the example below, the Accused System further comprises sending the translated commands to respective local controllers of the respective fluid -handling devices to which the respective commands are directed.  Exhibit 12.

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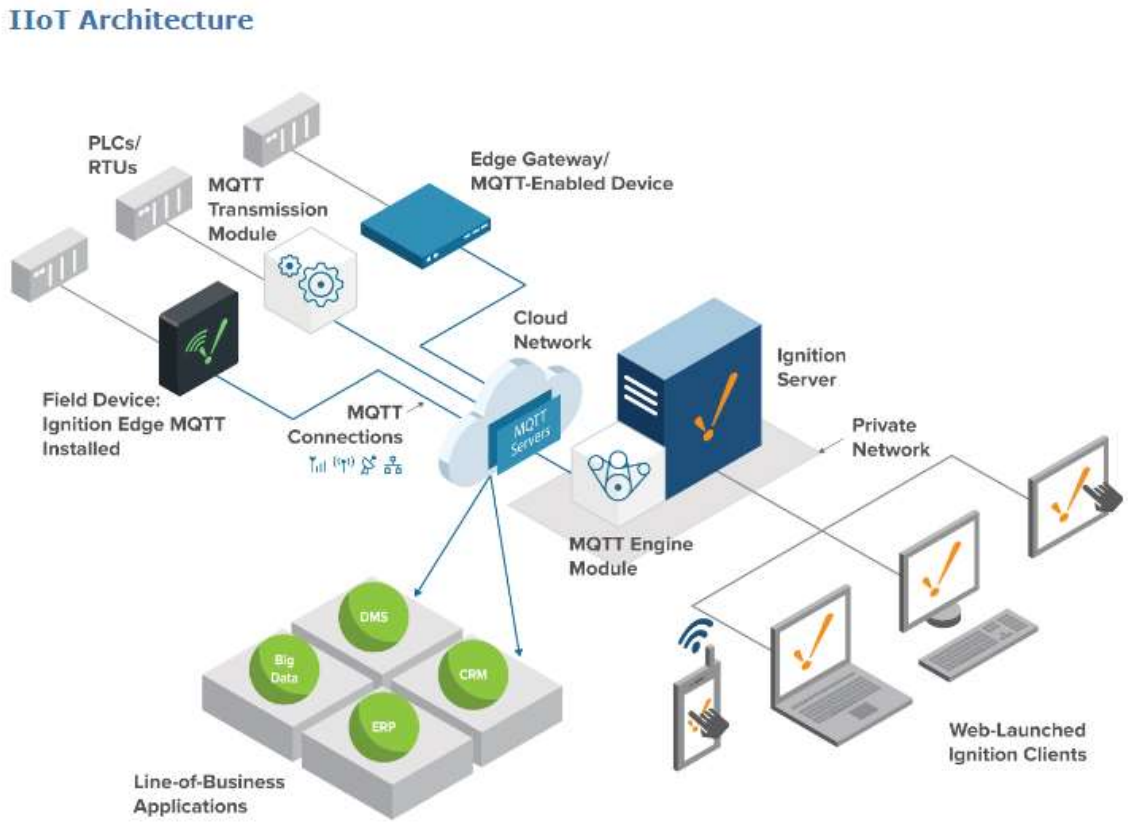
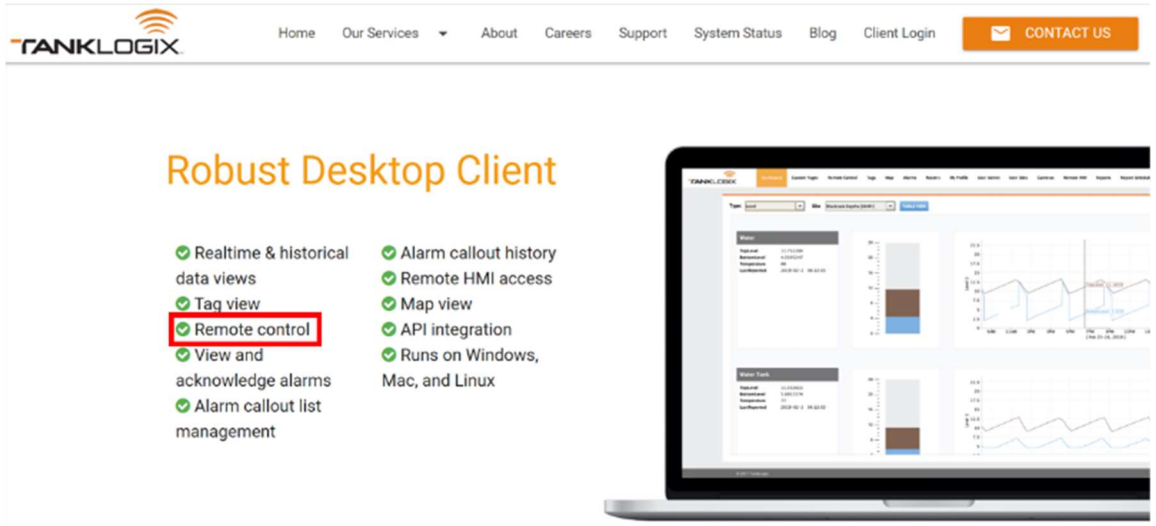
	For example, on information and belief, the PLCs receive commands in a protocol such as TCP/IP, received via, for example, a TCP/IP connection, and the send the commands to the fluid-handling devices to which the respective commands are directed via the appropriate protocol. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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.
[32.2] steps for executing control routines implicated by translated commands on an individual actuator or sensor; and	The Accused System performs steps for executing control routines implicated by translated commands on an individual actuator or sensor. *See, e.g.*: *See* claim 31 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.
[32.3] steps for transmitting data to the facility-interface module or modules.	The Accused System performs steps for transmitting data to the facility-interface module or modules.

U.S. Patent No. 10,488,871	The TankLogix System
	 Exhibit 12. 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 System operates in a

U.S. Patent No. 10,488,871	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 33	
[33] The method of claim 28, comprising: steps for loosening a stuck valve.	The Accused System performs steps for loosening a stuck valve. *See, e.g.*: *See* claim 28 above. On information and belief, the Accused System performs steps for loosening a stuck valve. *See, e.g.*:  Exhibit 1 (annotated).

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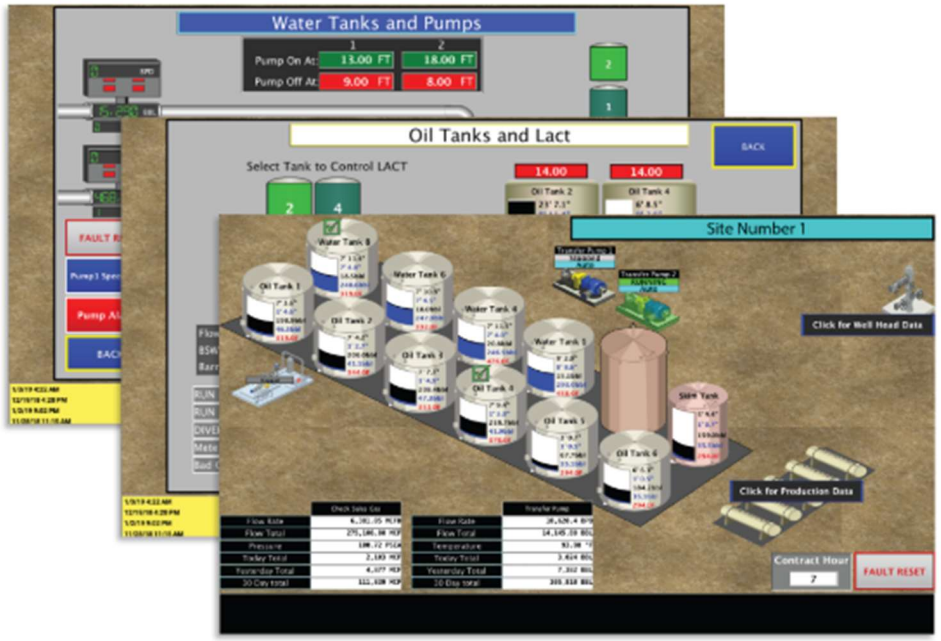
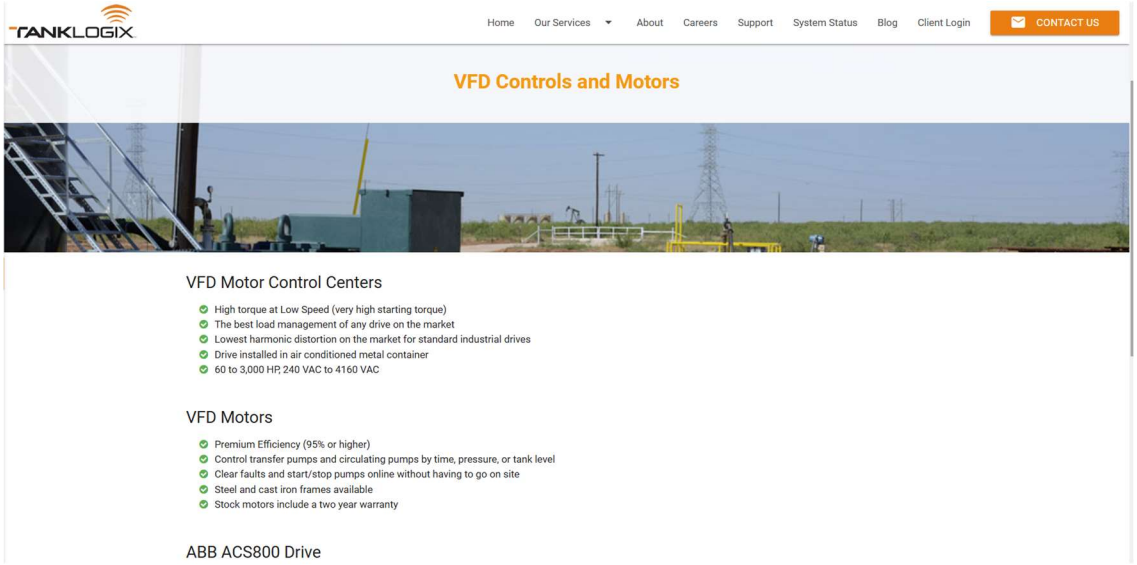
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These 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 34	

U.S. Patent No. 10,488,871	The TankLogix System
[34] The method of claim 28, comprising: steps for mitigating shocks to up-stream or down-stream fluid-handling devices.	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. *See, e.g.*: *See* claim 28 above. The Accused System performs steps for mitigating shocks by, for example, 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 a target value of the pump, during which the target state of the pump gradually changes over time. *See, e.g.*:  Exhibit 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

U.S. Patent No. 10,488,871	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.

Exhibit C

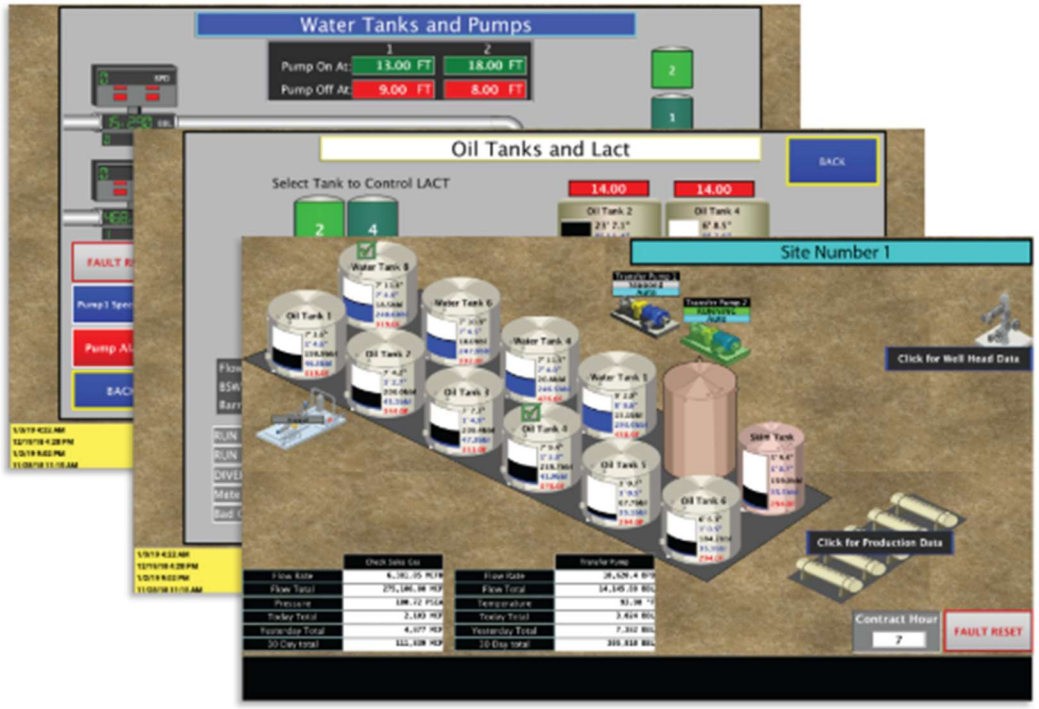
Infringement Analysis of U.S. Patent No. 11,294,403 Against the TankLogix Ignition-Hosted Automation System Implemented by TankLogix

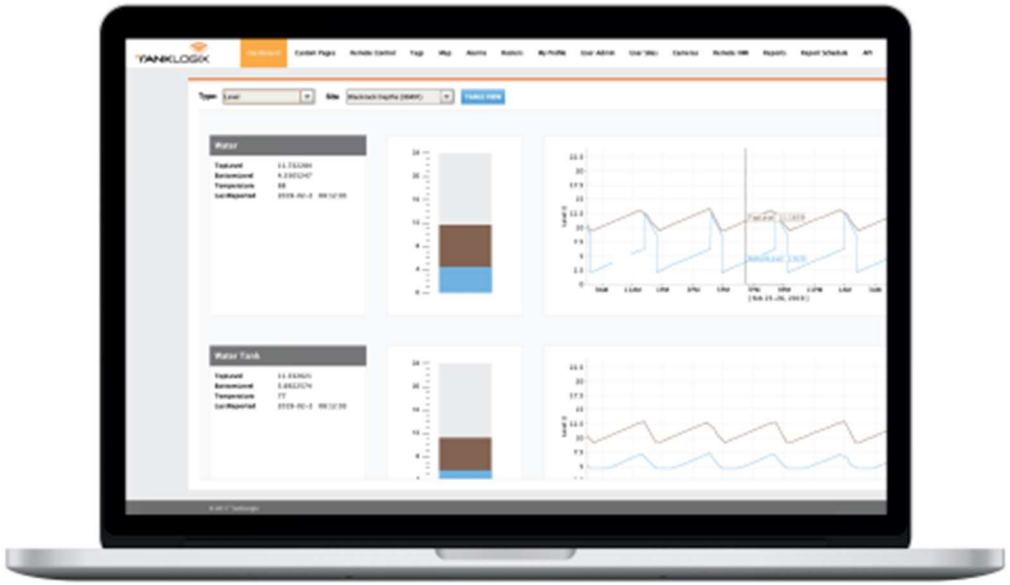
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System(s) each element of claims 1-30 of U.S. Patent No. 11,294,403 (the "'403 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed, implemented, maintained, sold, offered for sale, used, made, or imported into the U.S. by TankLogix, LLC.

References Cited:

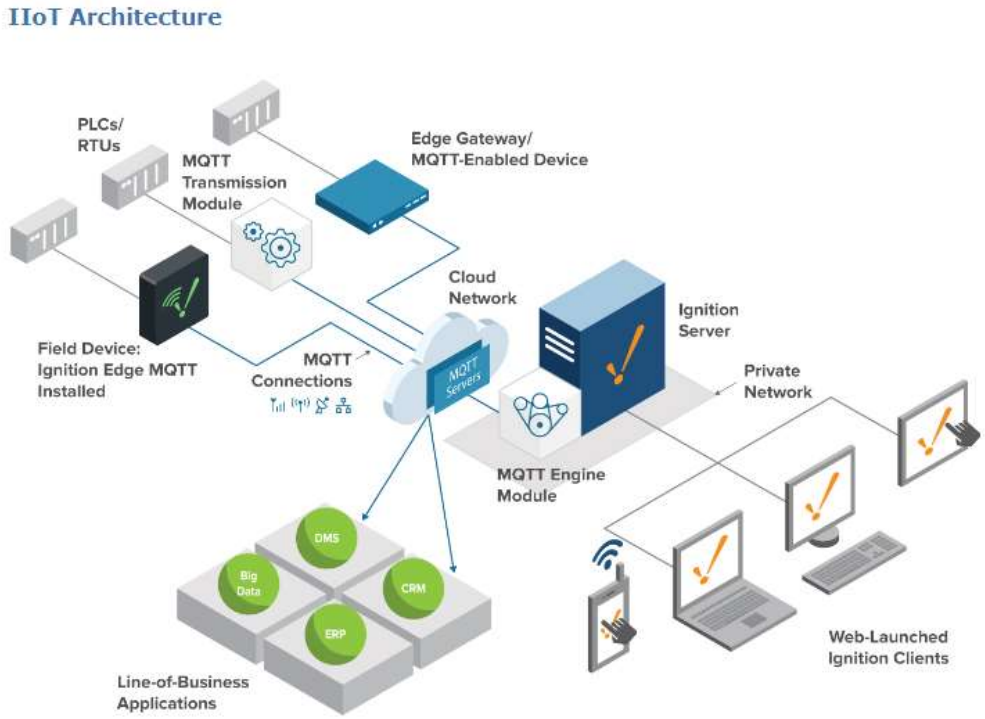
- Exhibit 1, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 2, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 3, https://tanklogix.com/vfd-controls-and-motors/.
- Exhibit 4, https://inductiveautomation.com/ignition/modules/perspective.
- Exhibit 5, https://mqtt.org/.
- Exhibit 6, https://tanklogix.com/tank-monitoring/benefits.
- Exhibit 7, https://docs.inductiveautomation.com/docs/7.9/visualization-and-dashboards/templates/template-udt-parameter.
- Exhibit 8, https://docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge.
- Exhibit 9, https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition.

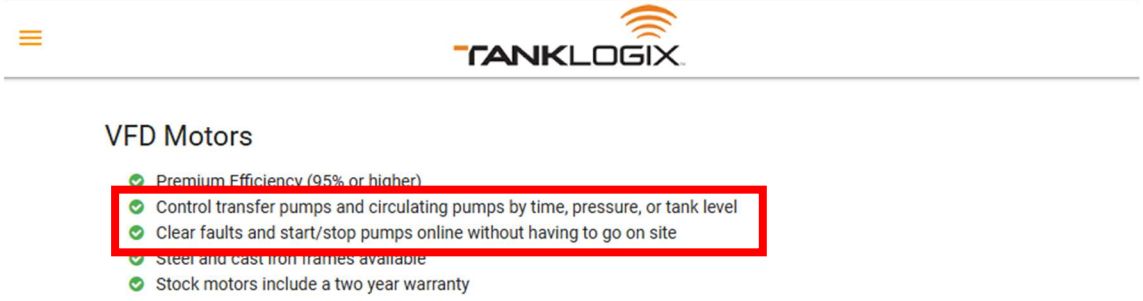
U.S. Patent No. 11,294,403	The Accused System
Claim 1	
[1.1] A system, comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a system. *See, e.g.*: Comprehensive Hosted SCADA TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered 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 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents.
[1.2] a first computer system disposed at a first fluid handling site, the first fluid handling site comprising a first pump, a first valve, and a first tank that handle a first fluid, the first tank having a first fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the first fluid in the first tank, and the first computer system being configured to provide remote control of the first pump or the first valve; and	The Accused System comprises a first computer system disposed at a first fluid handling site, the first fluid handling site comprising a first pump, a first valve, and a first tank that handle a first fluid, the first tank having a first fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the first fluid in the first tank, and the first computer system being configured to provide remote control of the first pump or the first valve. *See, e.g.*:

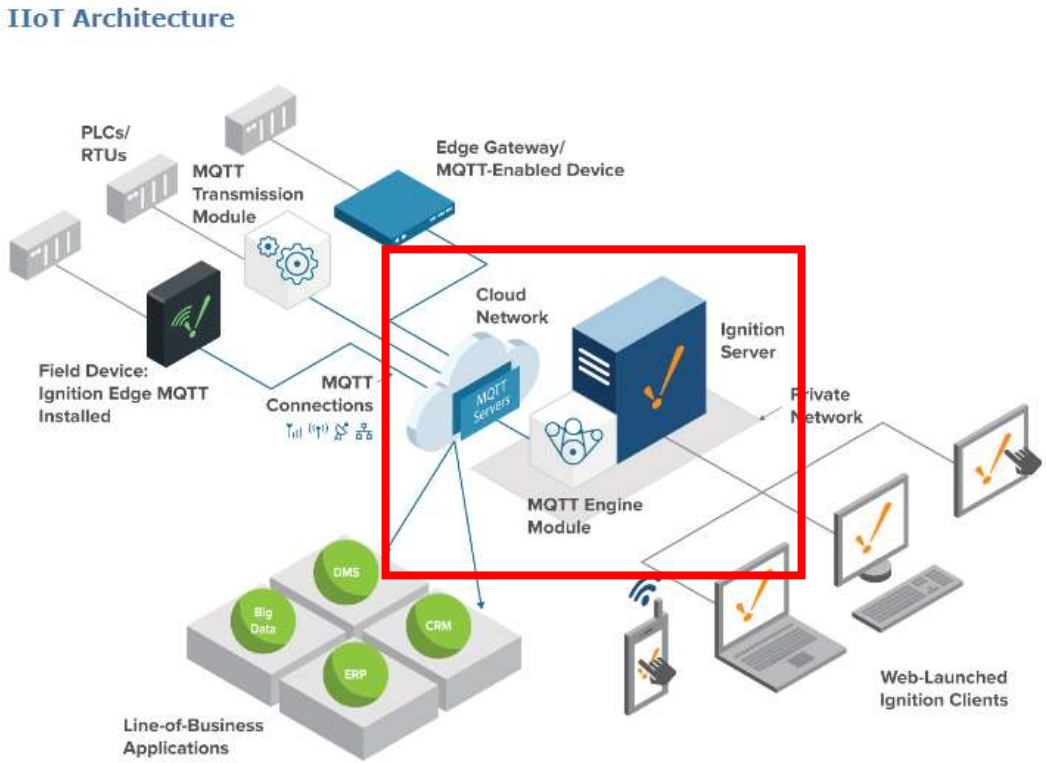
U.S. Patent No. 11,294,403	The Accused System
	

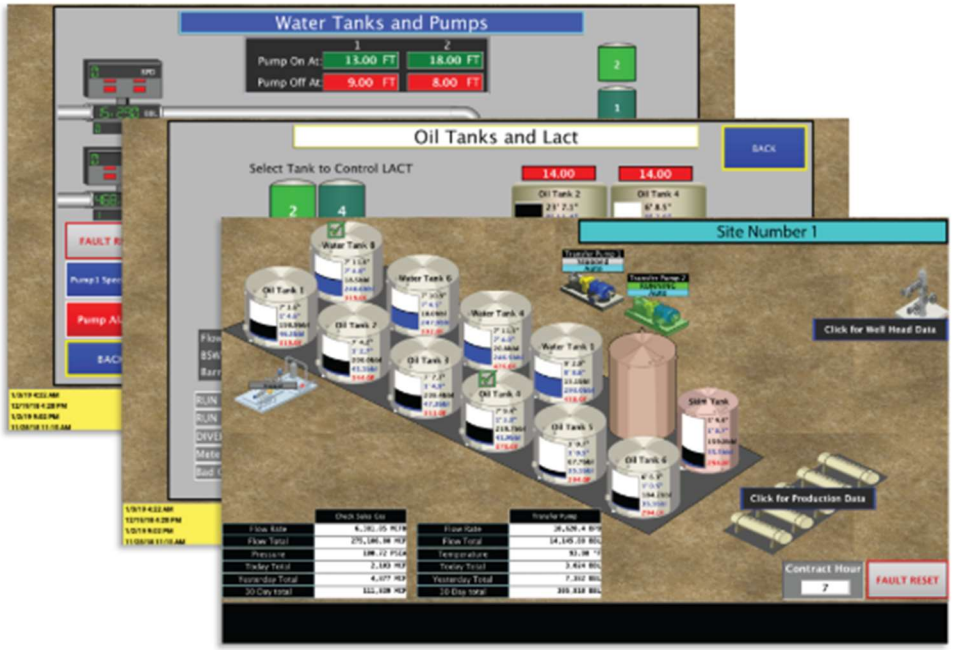
U.S. Patent No. 11,294,403	The Accused System
	

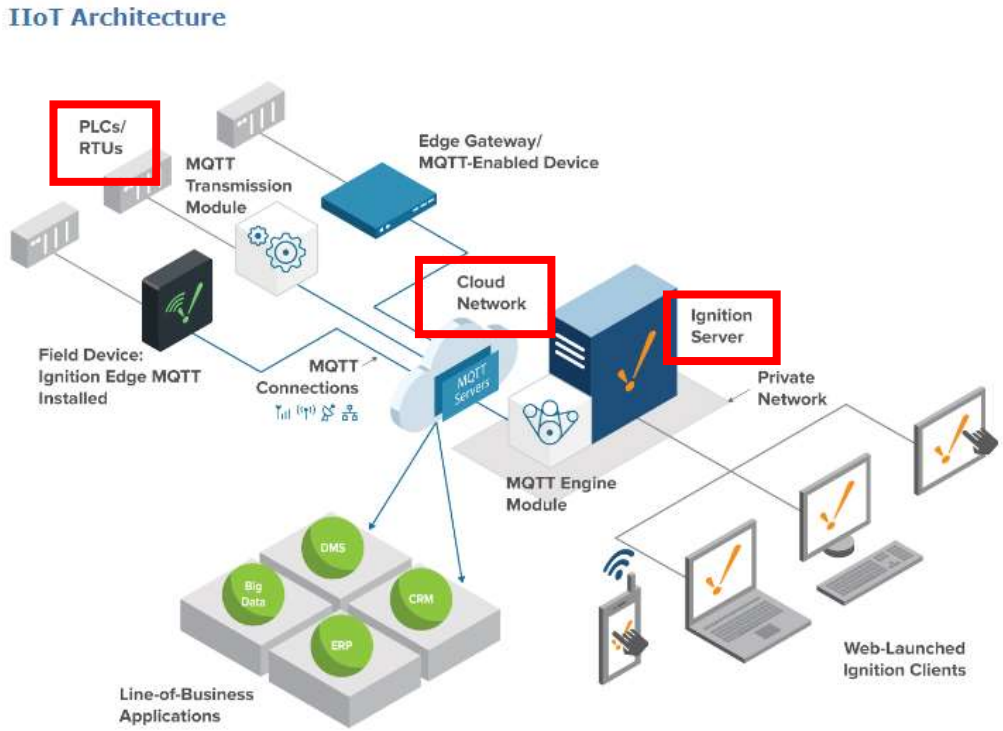
U.S. Patent No. 11,294,403	The Accused System
	TANKLOGIX Produced Wastewater This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate 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.

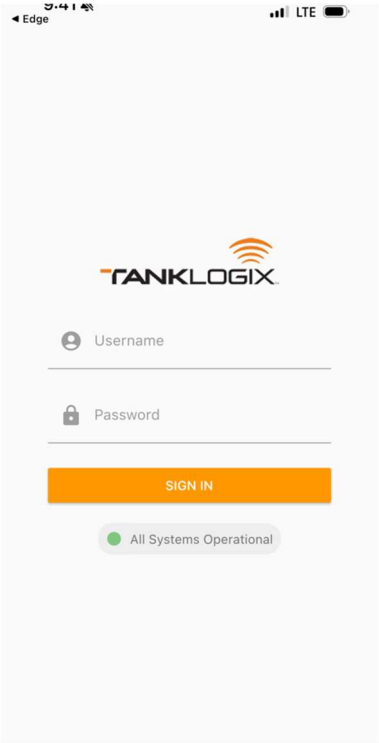
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2.

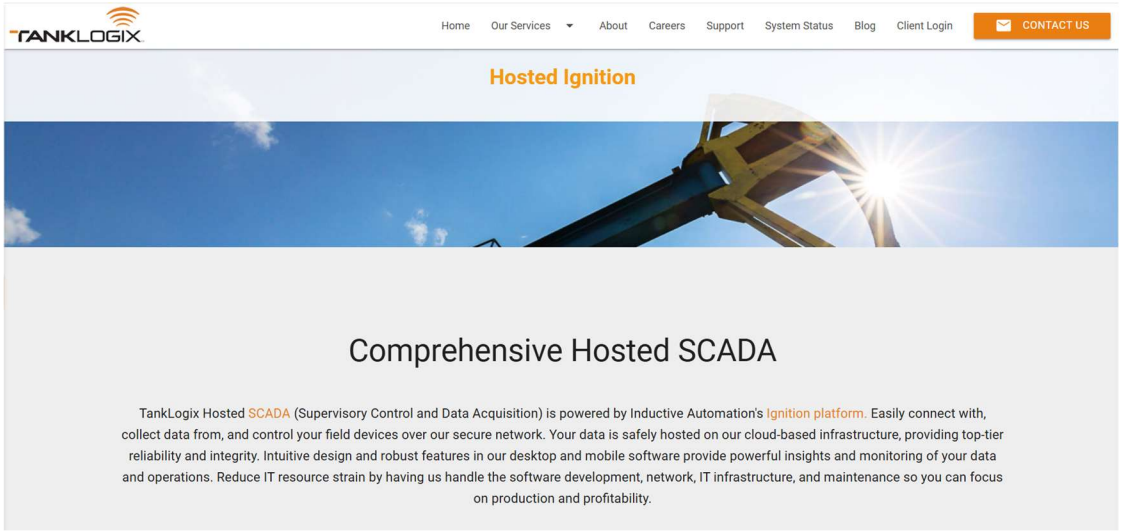
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 3 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test 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.
[1.3] a server system remote from the fluid handling site, wherein the server system has memory storing instructions that, when executed, effectuate operations comprising:	The Accused System comprises a server system remote from the fluid handling site, wherein the server system has memory storing instructions that, when executed, effectuate operations. *See, e.g.*:

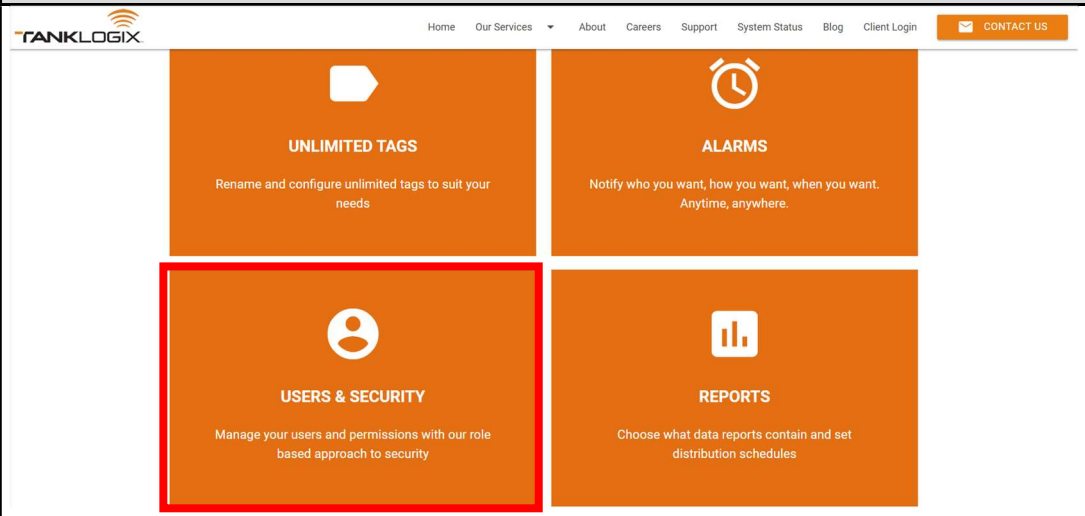
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.

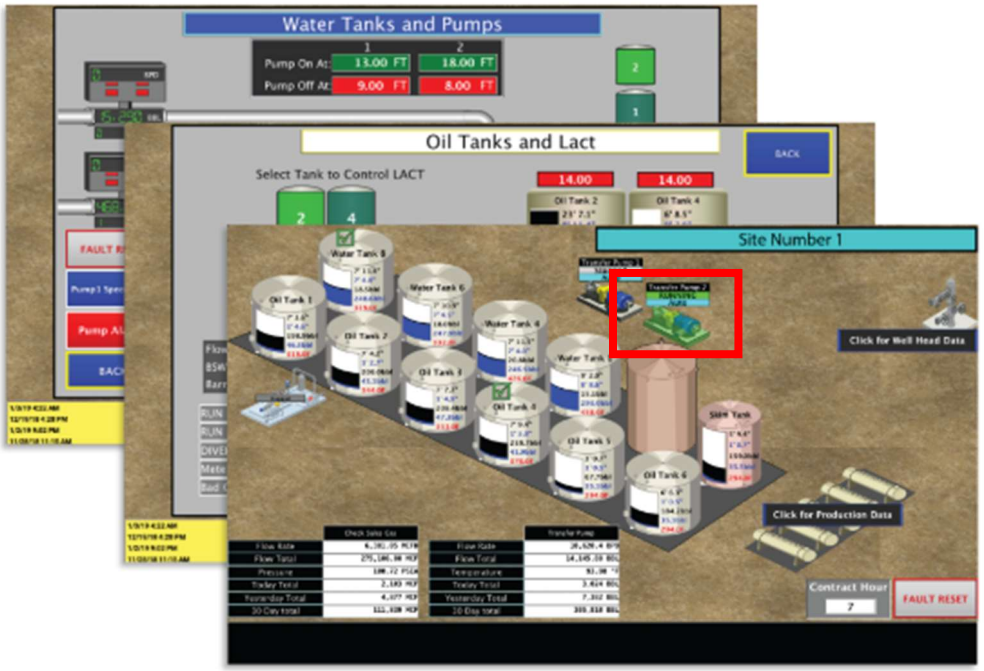
U.S. Patent No. 11,294,403	The Accused System
[1.4] receiving, with the server system, from the first computer, via a network, a first fluid level sensed by the fluid-level sensor;	The Accused System comprises receiving, with the server system, from the first computer, via a network, a first fluid level sensed by the fluid-level sensor. *See, e.g.*:  Exhibit 1.

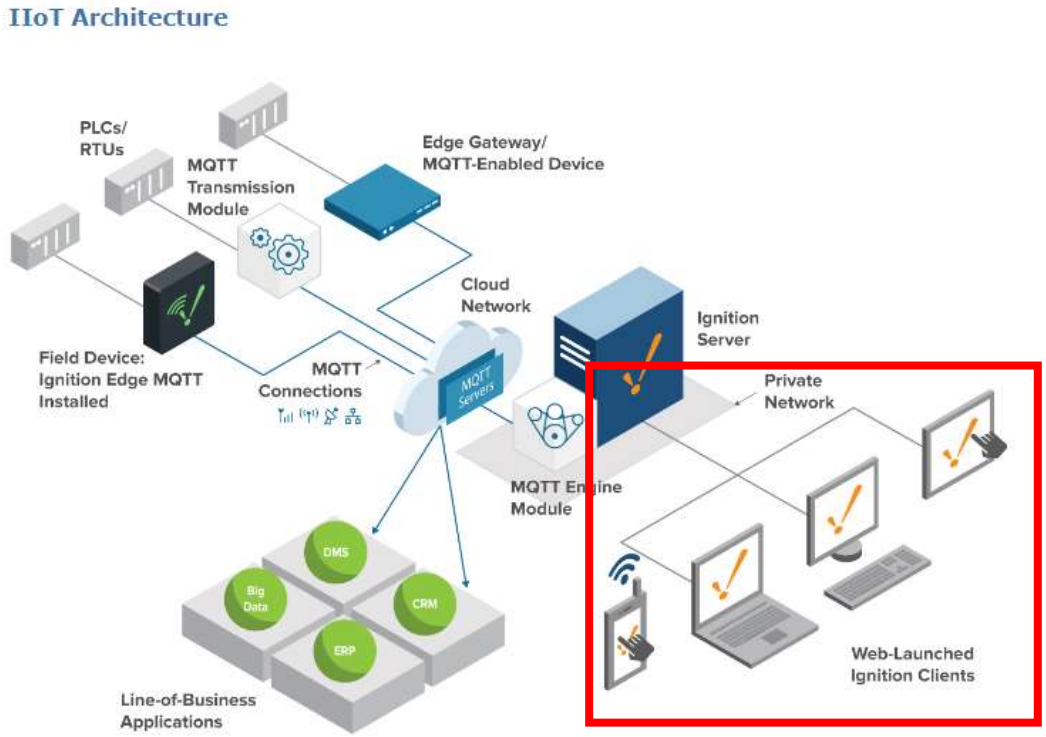
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.

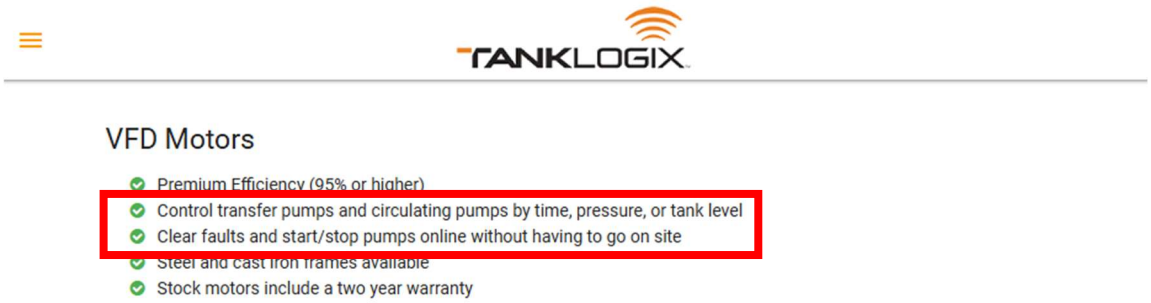
U.S. Patent No. 11,294,403	The Accused System
[1.5] obtaining, with the server system, credentials from a first client computing device;	The Accused System comprises obtaining, with the server system, credentials from a first client computing device. *See, e.g.*:  The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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.

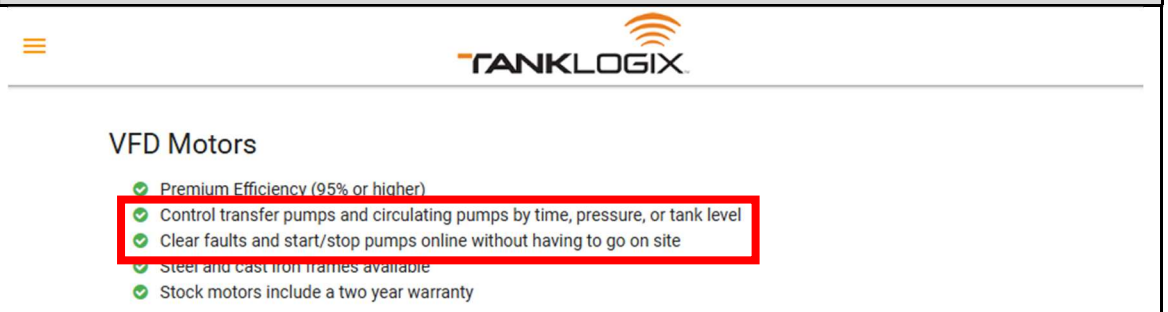
U.S. Patent No. 11,294,403	The Accused System
[1.6] determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact;	The Accused System comprises 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. *See, e.g.*:  Exhibit 1. The Accused System provides access to TankLogix customer organizations to monitor fluid handling sites:

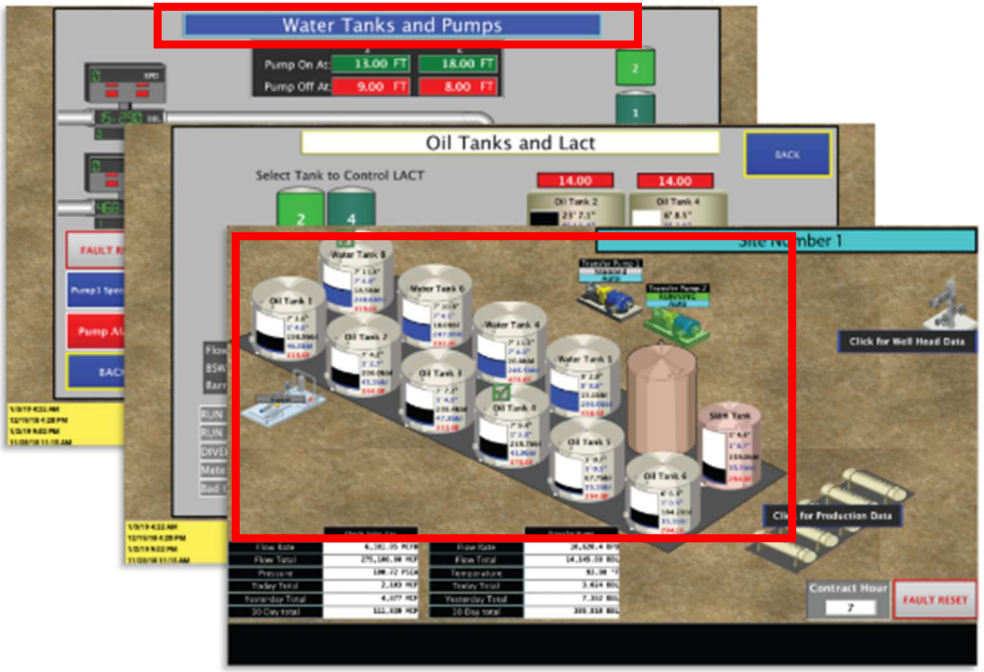
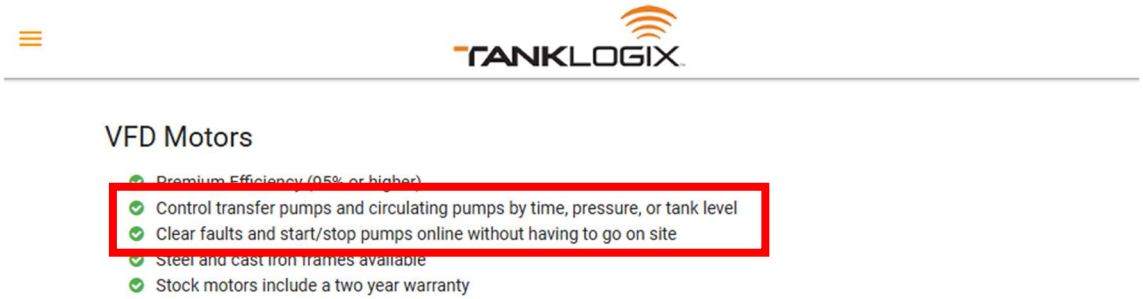
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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] 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 level, the first client computing device	The Accused System comprises 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 level, the first client computing device being remote from the server system and the first computer system. *See, e.g.*:

U.S. Patent No. 11,294,403	The Accused System
being remote from the server system and the first computer system;	 Exhibit 1.

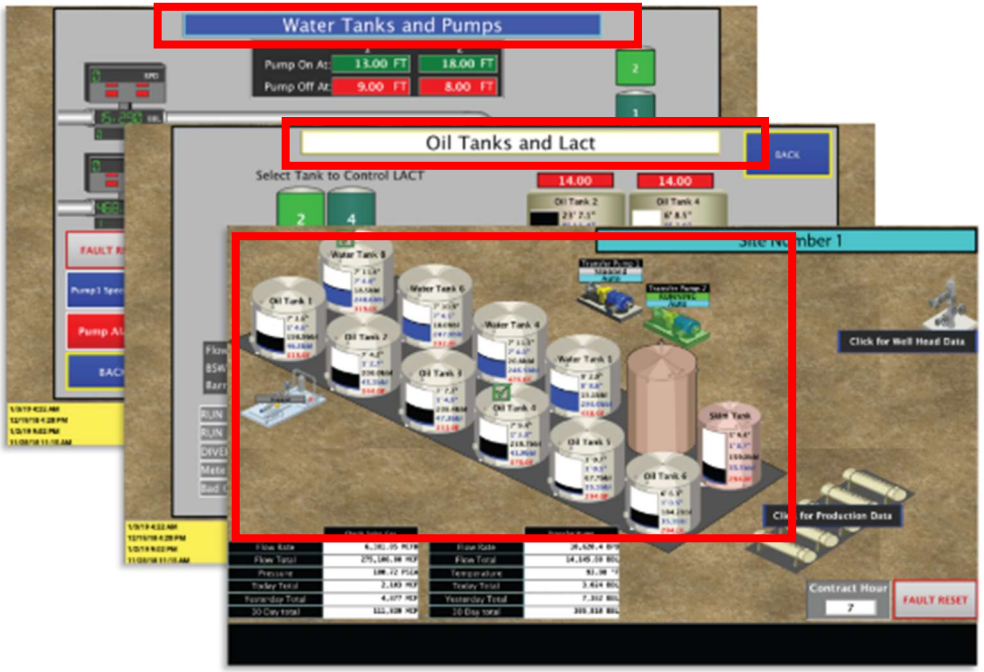
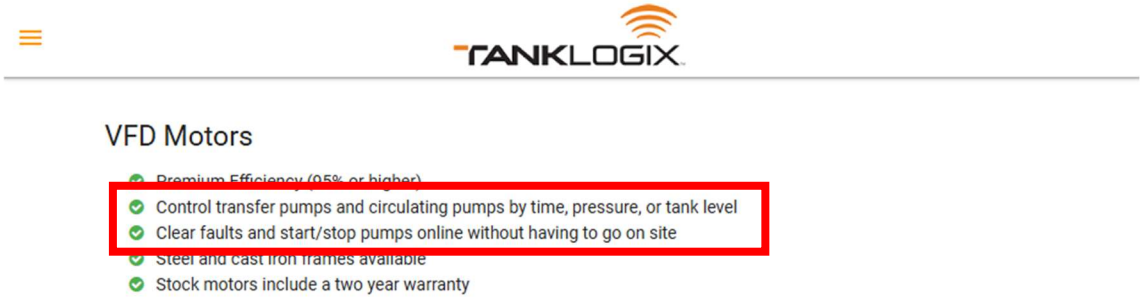
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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. 11,294,403	The Accused System
[1.8] receiving, with the server system, from the first client computing device, a first command to change a state of the first pump; and	The Accused System comprises receiving, with the server system, from the first client computing device, a first command to change a state of the first pump. *See, e.g.*:  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 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] 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 pump to a sequence of different target states that change over time.	The Accused System comprises 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 pump to a sequence of different target states that change over time. *See, e.g.*:

U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 3. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a 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 has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 2	
[2] The system of claim 1, wherein: the first fluid handling site comprises a second pump and a second tank that handle a second fluid, the second tank having a second fluid-level sensor with which the first computer system is configured to communicate to obtain a	In the Accused System, the first fluid handling site comprises a second pump and a second tank that handle a second fluid, the second tank having a second fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the second fluid in the second tank, and the first computer system being configured to provide remote control of the second pump. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,294,403	The Accused System
level of the second fluid in the second tank, and the first computer system being configured to provide remote control of the second pump.	 Exhibit 1  Exhibit 3.

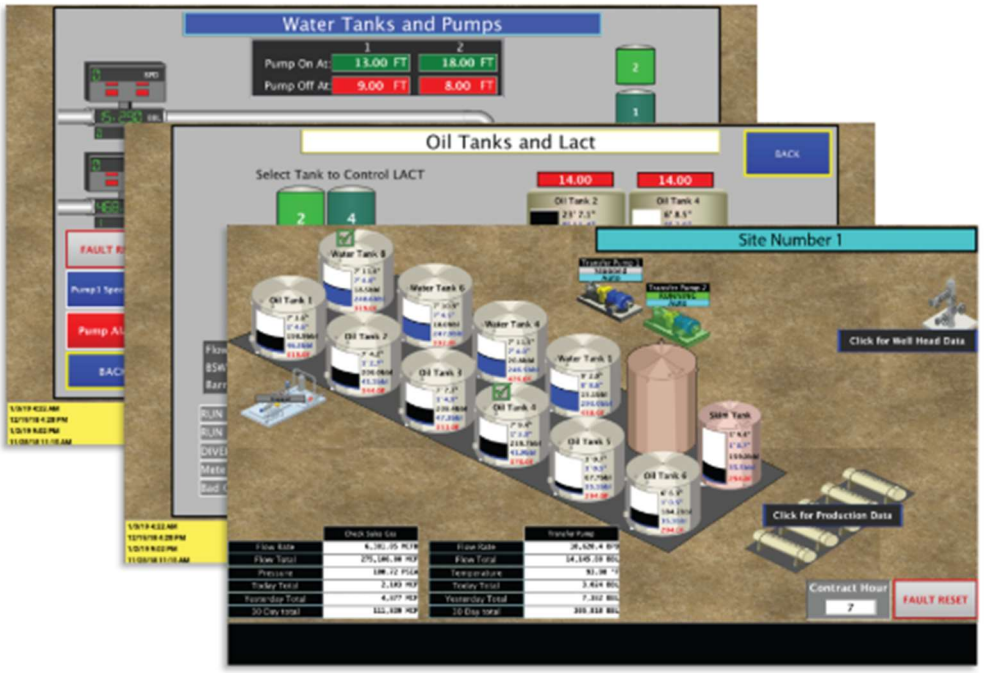
U.S. Patent No. 11,294,403	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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 3	
[3] The system of claim 2, comprising: the first tank, the first pump, the first valve, the second tank, and the second pump, wherein the first fluid is water and the second fluid is oil, wherein the first tank or the second tank is an oil/water separation tank.	The Accused System comprises the first tank, the first pump, the first valve, the second tank, and the second pump, wherein the first fluid is water and the second fluid is oil, wherein the first tank or the second tank is an oil/water separation tank. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1  Exhibit 3.

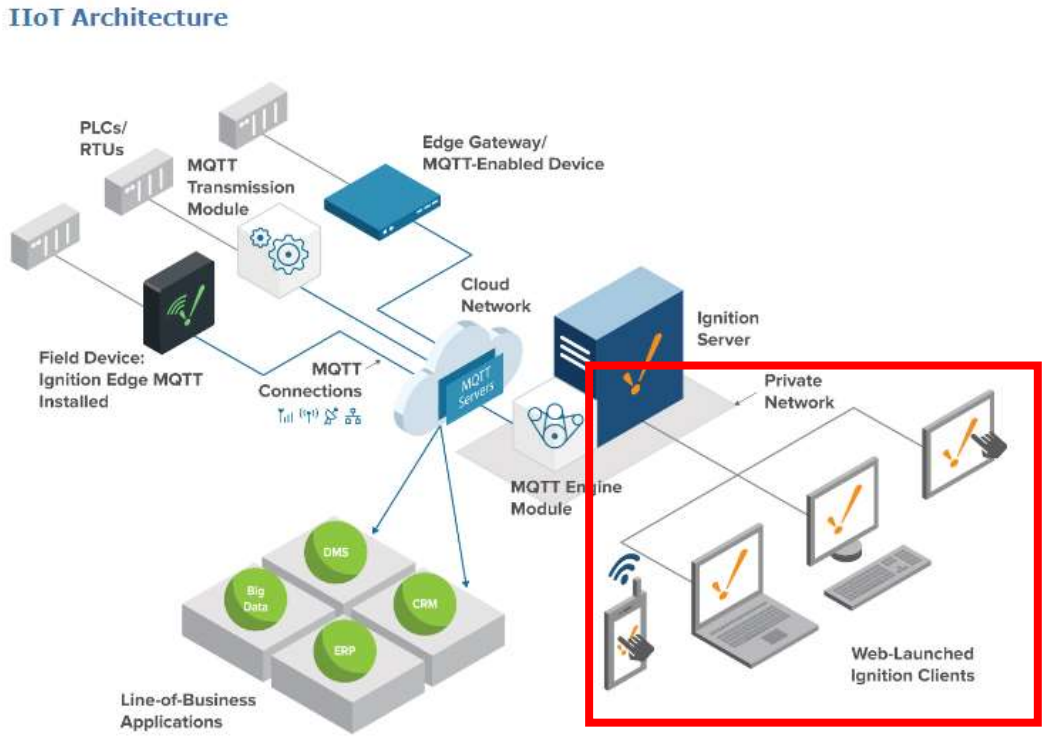
U.S. Patent No. 11,294,403	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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] 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 pump.	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 pump. *See, e.g.*: *See* claim 1 above. Exhibit 3. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a 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

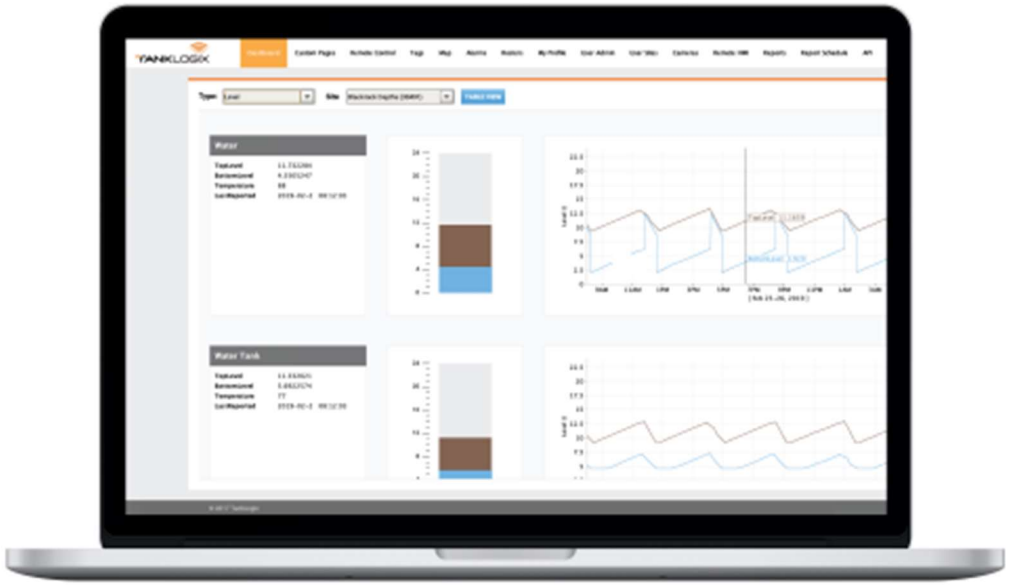
U.S. Patent No. 11,294,403	The Accused System
	insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 5	
[5] 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 pump.	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 pump. *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 '403 Patent, 6:35-40, 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 Exhibit 3.

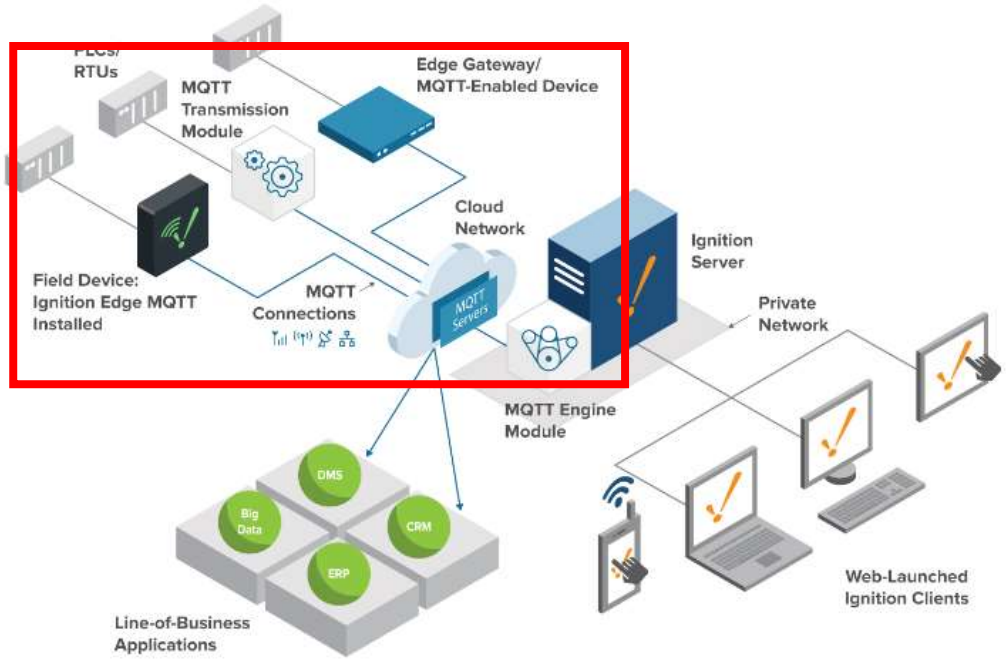
U.S. Patent No. 11,294,403	The Accused System
	As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command. *See also, 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 has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 6	
[6] 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 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 level of the first fluid in the first tank. *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

U.S. Patent No. 11,294,403	The Accused System
	Exhibit 3. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command.  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

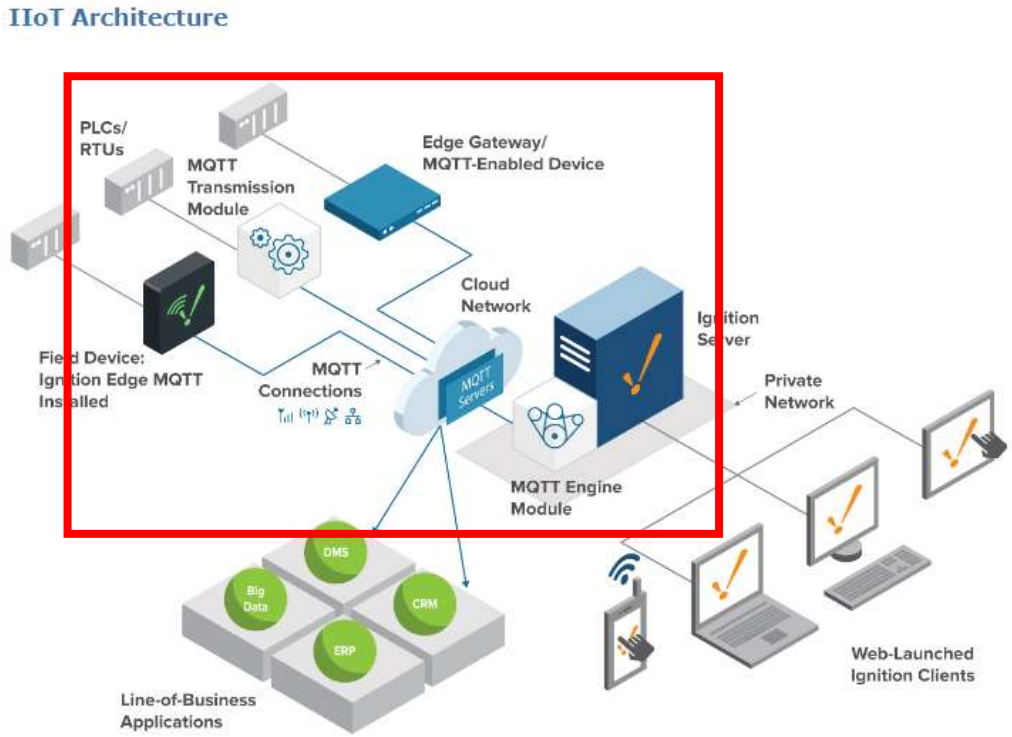
U.S. Patent No. 11,294,403	The Accused System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 7	
[7] The 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 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 level. *See, e.g.*: *See* claim 1 above.

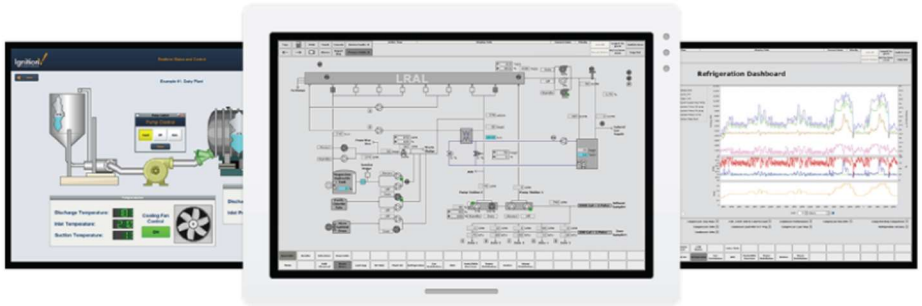
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2

U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1. 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

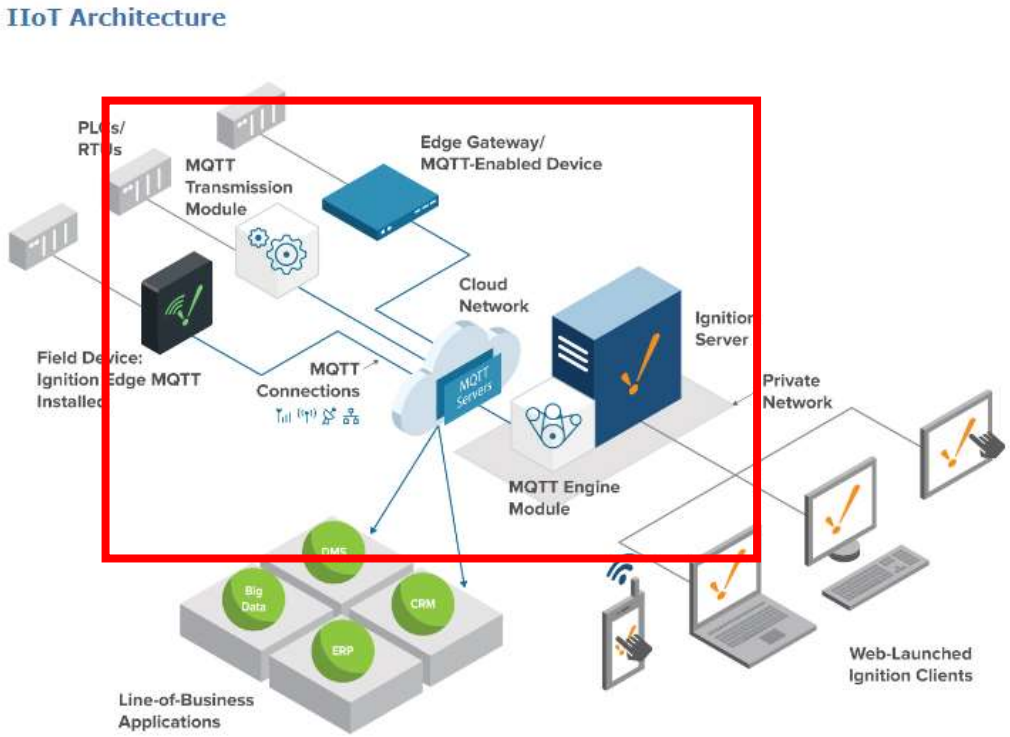
U.S. Patent No. 11,294,403	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 8	
[8] The system of claim 1, wherein: the first computer system is configured to communicate 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. IIoT Architecture 

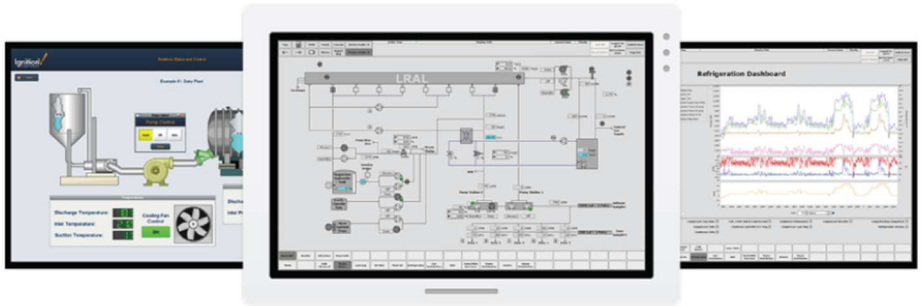
U.S. Patent No. 11,294,403	The Accused System
	Exhibit 2 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test 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 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, the different fluid-handling devices including the first pump or the first valve.	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, the different fluid-handling devices including the first pump or the first valve. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2

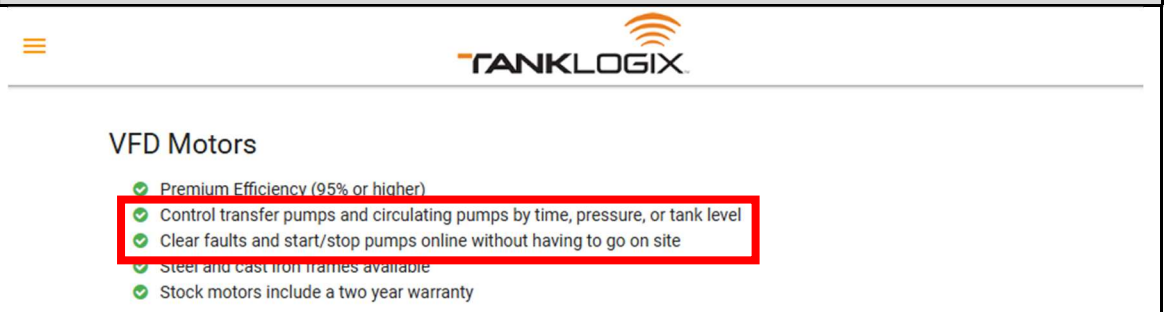
U.S. Patent No. 11,294,403	The Accused System
	Web-based HMI and SCADA applications deployment Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way. Create runtime clients 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 9 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 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. 11,294,403	The Accused System
Claim 10	
[10] The system of claim 9, wherein translating the plurality of commands comprises steps for translating commands.	The Accused System comprises translating the plurality of commands comprises steps for translating commands. *See, e.g.*: *See* claim 9 above. This claim element invokes 35 U.S.C. Section 112, para. 6. An example of corresponding structure includes the following at 9:51-58 of the ’403 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.”

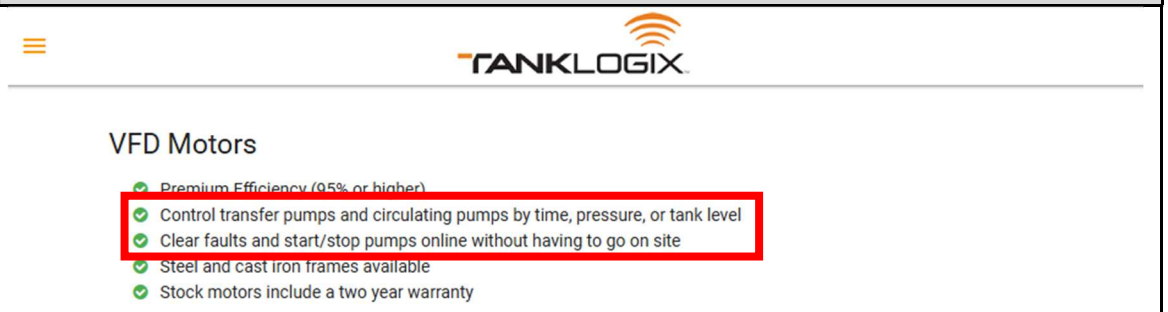
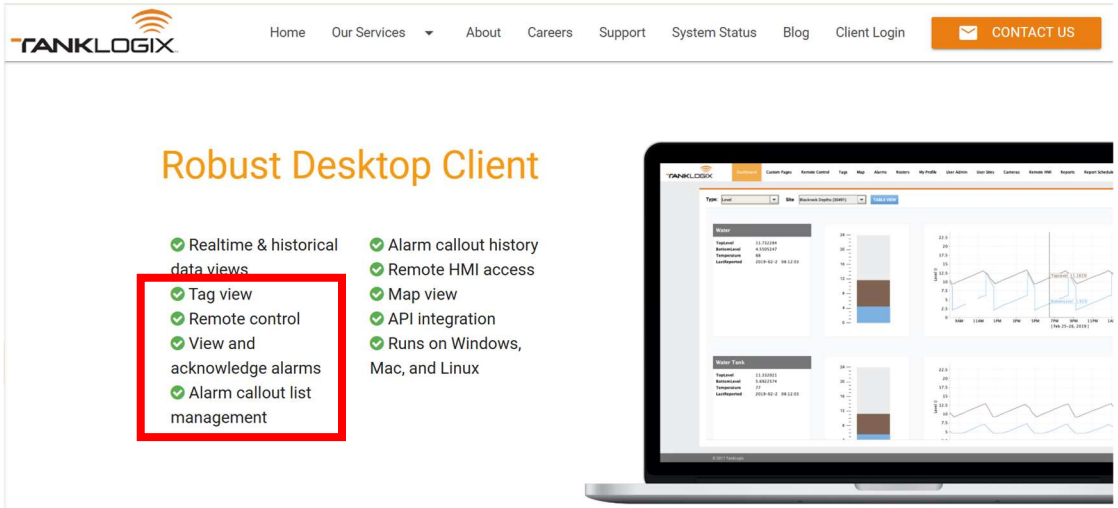
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2

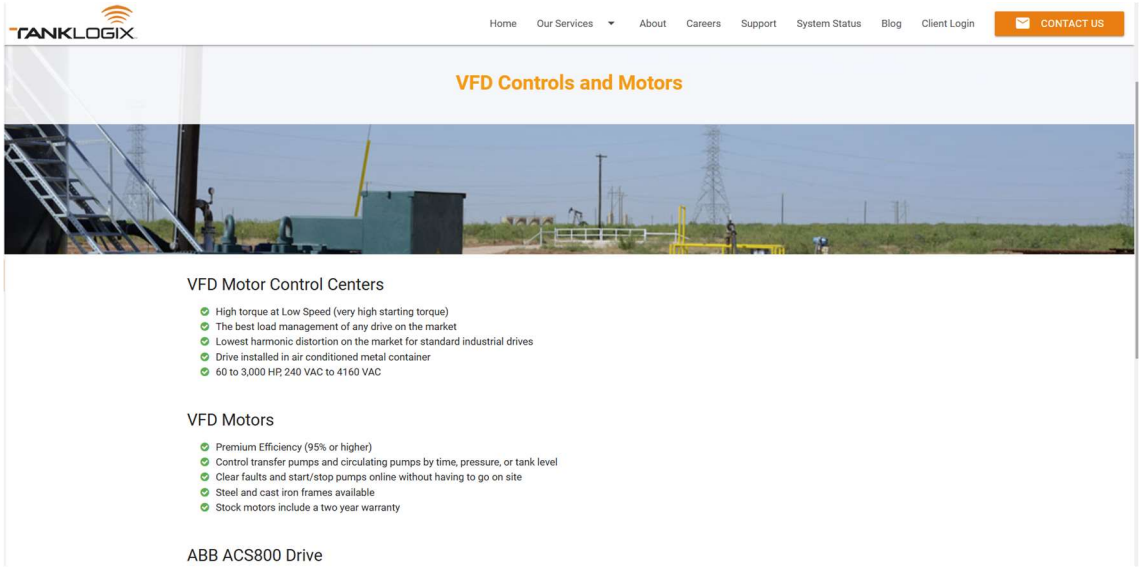
U.S. Patent No. 11,294,403	The Accused System
	Web-based HMI and SCADA applications deployment Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way. Create runtime clients 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 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 has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 11	

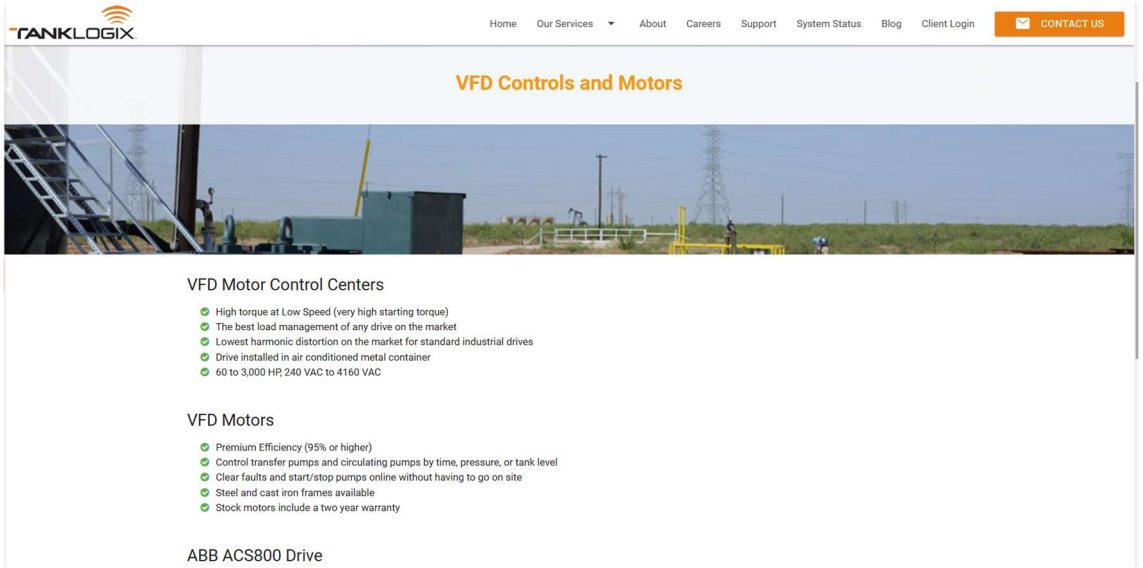
U.S. Patent No. 11,294,403	The Accused System
[11] The system of claim 9, wherein the plurality of different formats and protocols comprise: modbus protocol; and analog electrical signals.	In the Accused System, the plurality of different formats and protocols comprise: modbus protocol; and analog electrical signals. *See, e.g.*: *See* claim 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 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 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 9, 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.*:

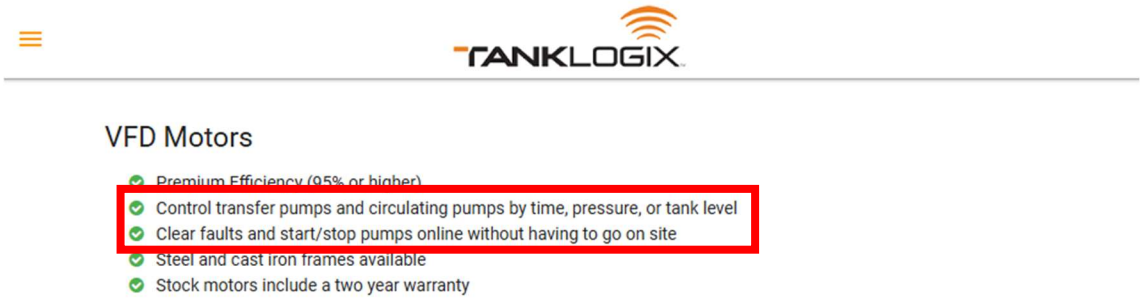
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 3. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command. 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 has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 13	
[13.1] The system of claim 9, wherein: the first computer system is coupled to at least some of the plurality of different fluid handing 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 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 6.

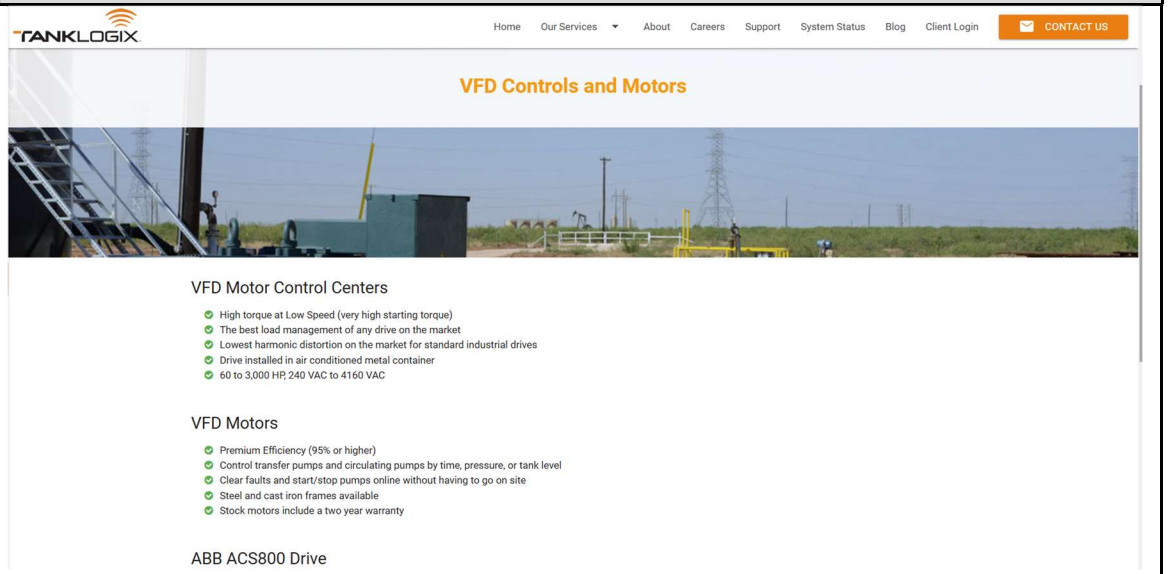
U.S. Patent No. 11,294,403	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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.
[13.2] 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.	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. An example of corresponding structure can be found at 6:62-7:21, 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:

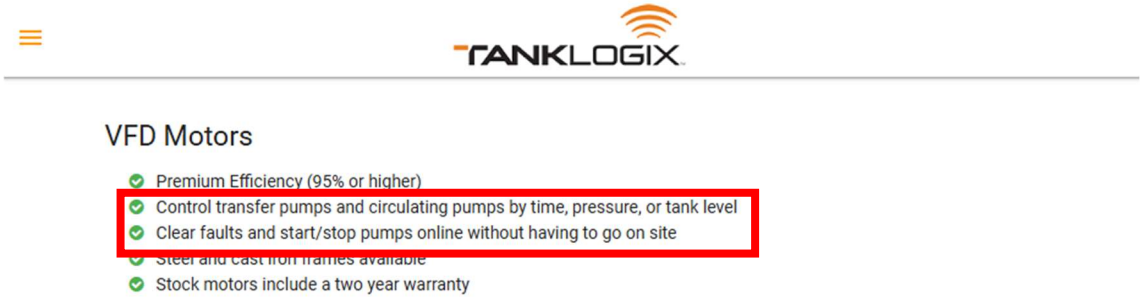
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 3.  Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

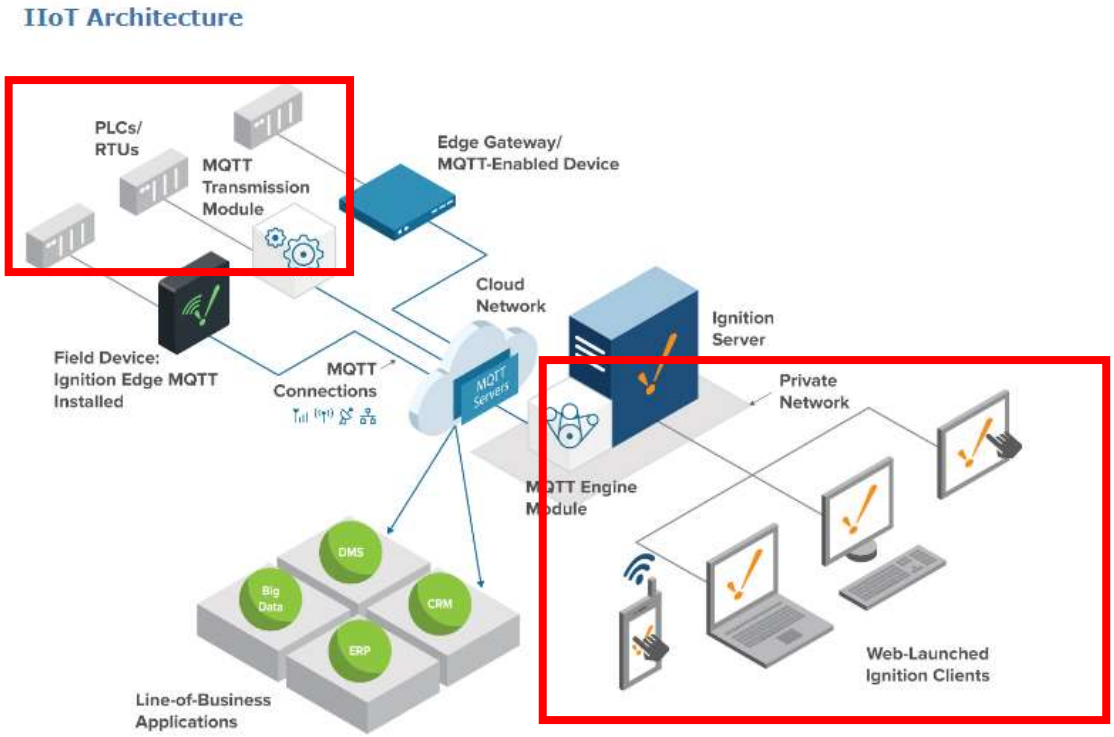
U.S. Patent No. 11,294,403	The Accused System
	current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 14	
[14] The system of claim 9, 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 among the plurality of different fluid handing devices.	In the Accused System, the plurality of different formats and protocols comprise three different protocols communicated 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 9 above.  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.

U.S. Patent No. 11,294,403	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 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 15	
[15] The system of claim 9, wherein two of the plurality of different formats and protocols comprise binary frames with redundant bits used to detect errors.	In the Accused System, two of the plurality of different formats and protocols comprise binary frames with redundant bits used to detect errors. *See, e.g.*: *See* claim 9 above. 

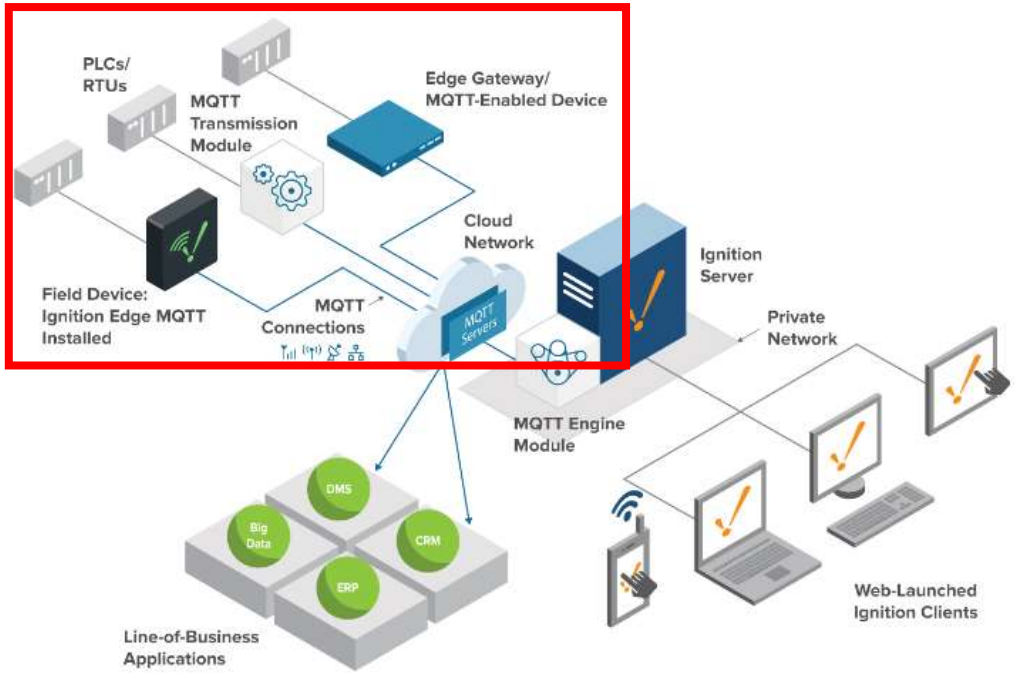
U.S. Patent No. 11,294,403	The Accused System
	Exhibit 3. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as binary frames with redundant bits used to detect errors. *See also, e.g.*, claim 14. 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] The system of claim 9, 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 9 above.  Exhibit 3.

U.S. Patent No. 11,294,403	The Accused 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. *See also, e.g.*, claim 14. 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	

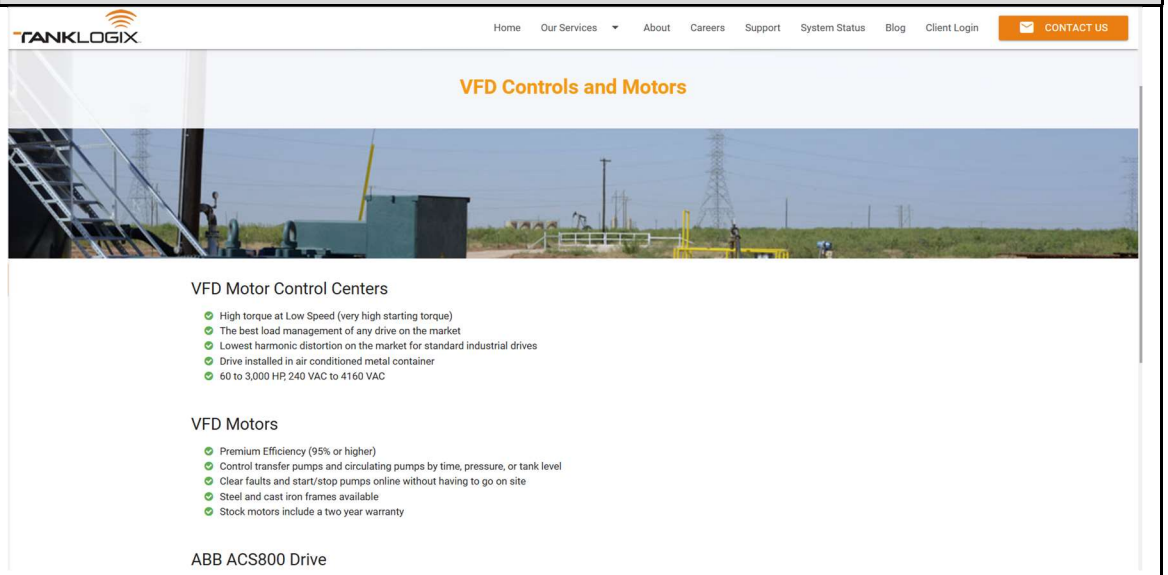
U.S. Patent No. 11,294,403	The Accused System
[17] The system of claim 9, wherein the first computer system is configured to operate in an automatic mode, a mixed automatic mode, and a manual mode.	In the Accused System, the first computer system is configured to operate in an automatic mode, a mixed automatic mode, and a manual mode. *See, e.g.*: *See* claim 9 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 the 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:

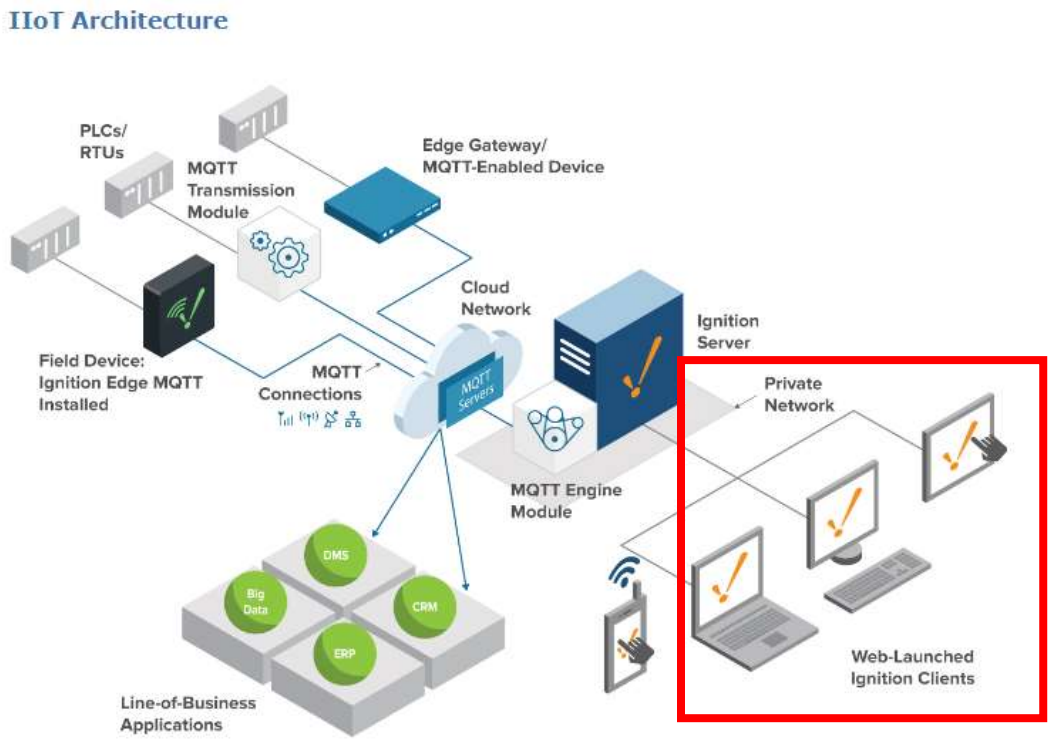
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result 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.

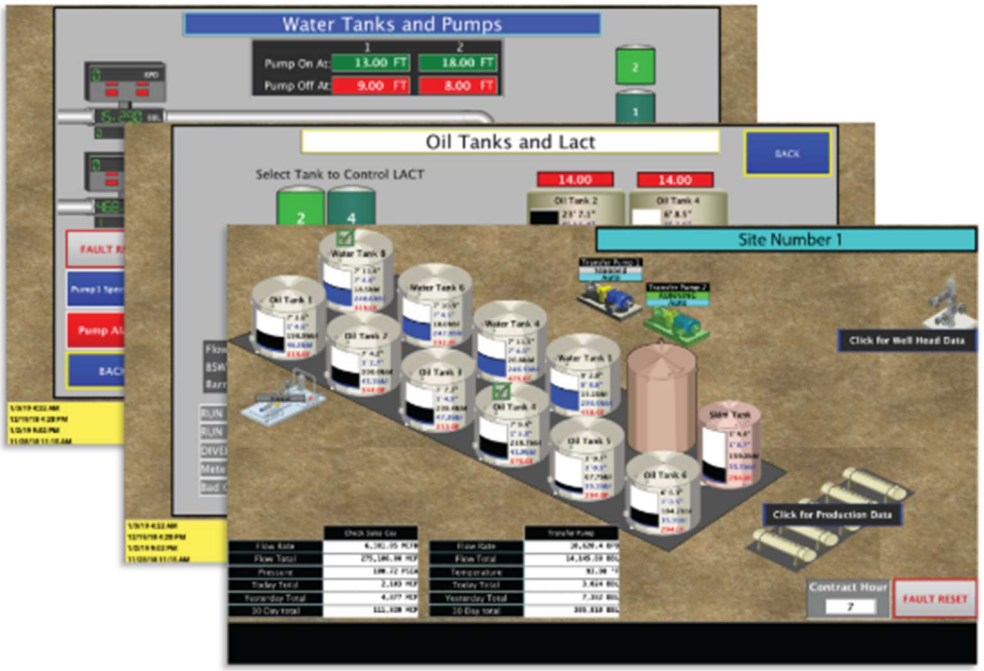
U.S. Patent No. 11,294,403	The Accused System
Claim 18	
[18] The system of claim 17, wherein the automatic mode comprise executing s process recipe in which a collection of set points are targeted.	In the Accused System, the automatic mode comprises executing a process recipe in which a collection of set points are targeted. *See, e.g.*: *See* claim 17 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. Execution of the process recipe changes the state of the pump driven by the VFD described above to a sequence of different target states that change over time. On information and belief, 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. 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.

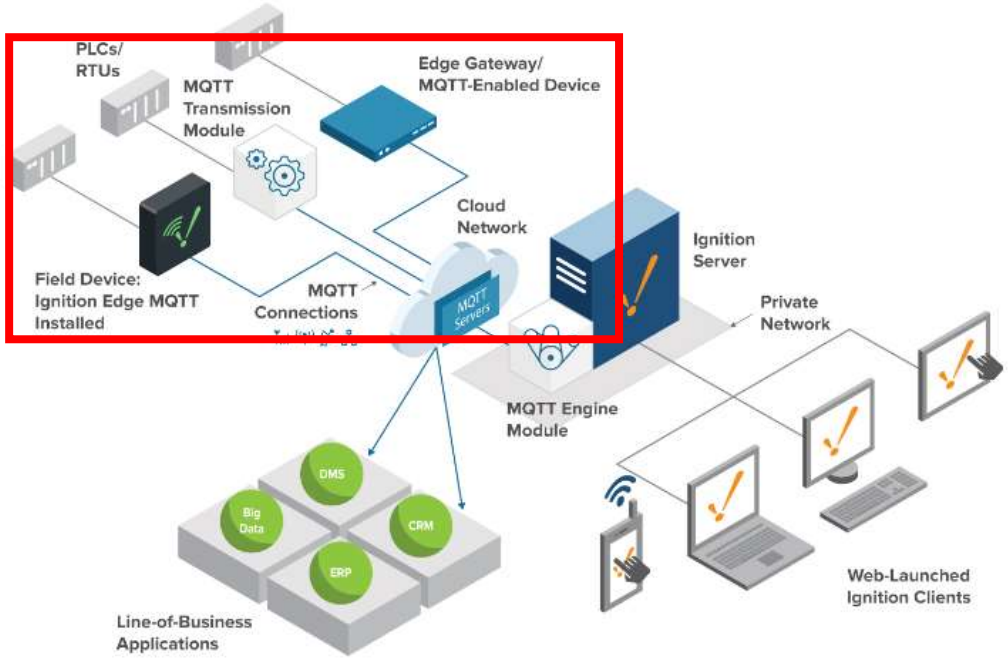
U.S. Patent No. 11,294,403	The Accused System
Claim 19	
[19] The system of claim 9, wherein translating the plurality of commands comprises steps for identifying protocols and control busses.	In the Accused System, translating the plurality of commands comprises steps for identifying protocols and control busses. *See, e.g.*: *See* claim 9 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. IIoT Architecture 

U.S. Patent No. 11,294,403	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 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] The system of claim 1, wherein the first computer system comprises a protocol multiplexer.	In the Accused System, the first computer system comprises a protocol multiplexer. *See, e.g.*: *See* claim 1 above. The protocol multiplexer is described at '403 Patent, 9:29-38, which states: the protocol multiplexer 72 selects among the command translators 74, each of which corresponds to a different protocol. For example, the command translator 80 may correspond to a protocol of control bus 66, such as the modbus RTU protocol; the command translator 78 may corresponds to a protocol of the control bus 64, such as a binary or analog voltage or current signal conveyed via a data acquisition board; and the command translator 76 may corresponds to a protocol of the control bus 62, such as the Ethernet protocol.

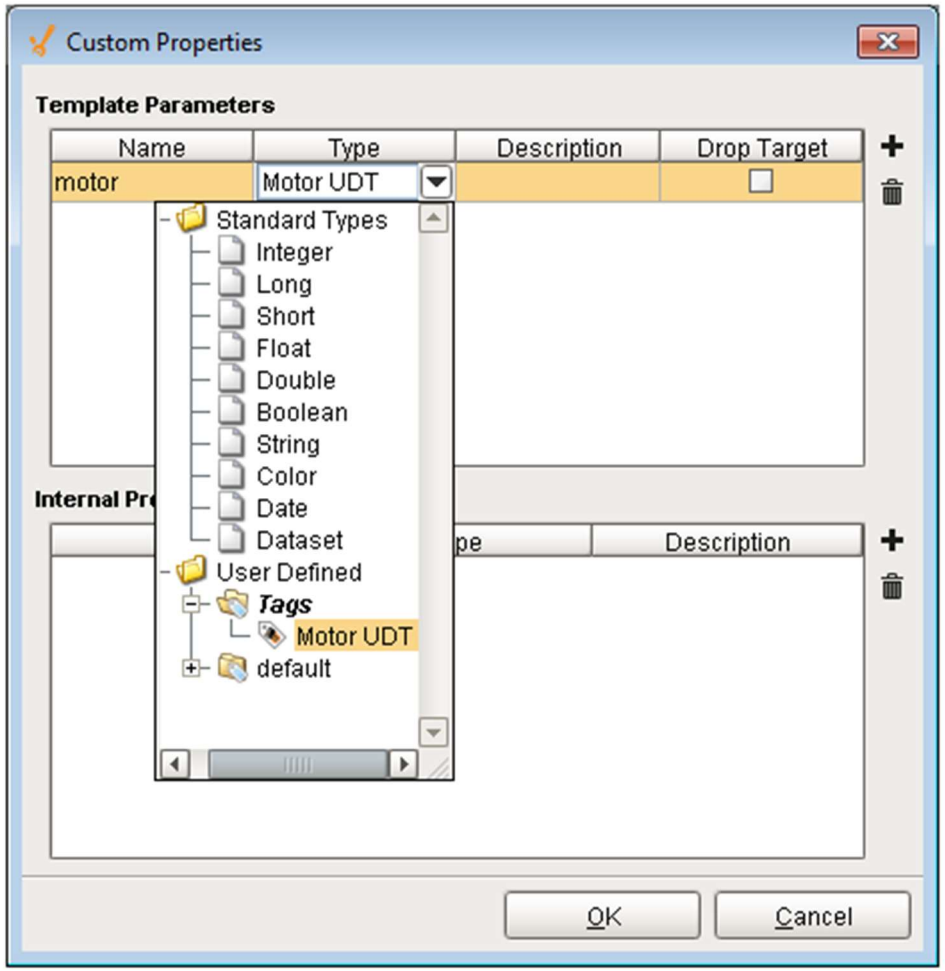
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 3. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs, ethernet signals over a network bus, and Modbus signals 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 has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 21	

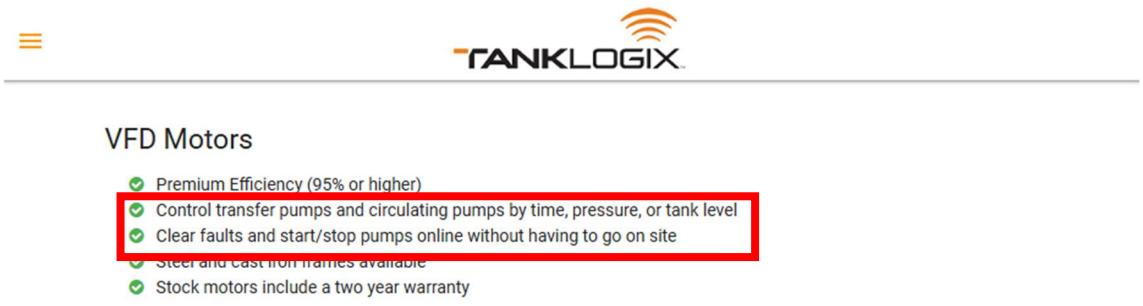
U.S. Patent No. 11,294,403	The Accused System
[21] The system of claim 1, wherein the first computer system comprises a site-management module implemented with multiple threads.	In the Accused System, the first computer system comprises a site-management module implemented with multiple threads. *See, e.g.*: *See* claim 1 above.  Exhibit 2.

U.S. Patent No. 11,294,403	The Accused 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. 11,294,403	The Accused System
Claim 22	
[22] The system of claim 1, wherein the first computer system comprises means for implementing remotely issued commands, such that once remotely issued commands are issued and received, the remotely issued commands are executed to completion even if Internet access is lost before the commands are fully executed.	In the Accused System, the first computer system comprises means for implementing remotely issued commands, such that once remotely issued commands are issued and received, the remotely issued commands are executed to completion even if Internet access is lost before the commands are fully executed. *See, e.g.*: *See* claim 1 above. IIoT Architecture  Exhibit 2.

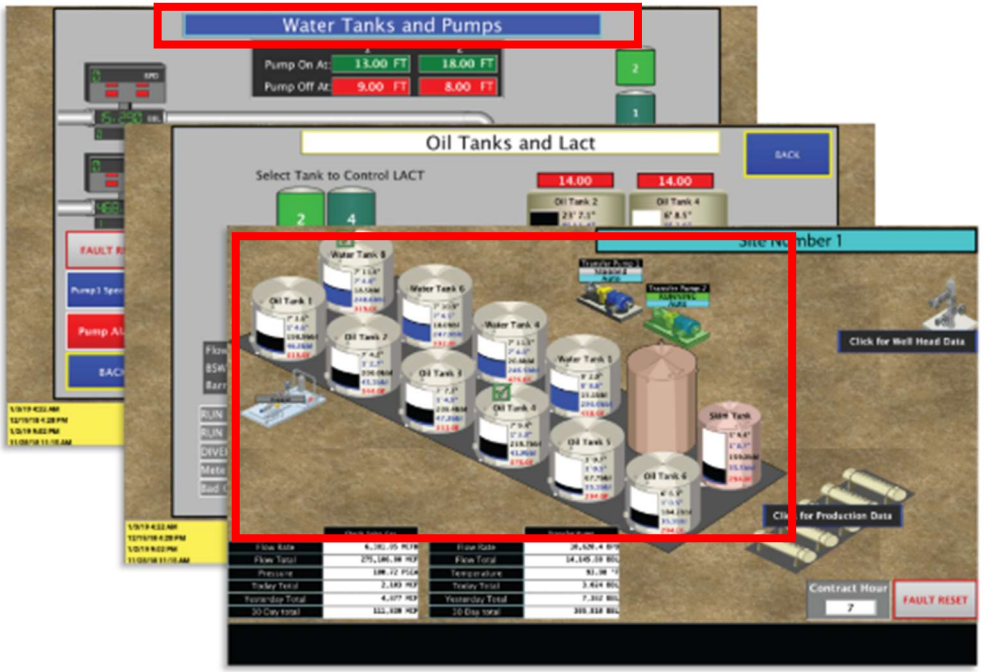
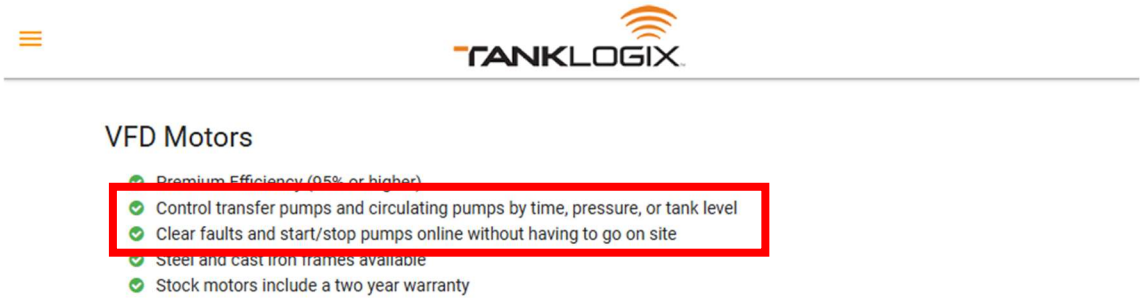
U.S. Patent No. 11,294,403	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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 23	
[23] The system of claim 1, wherein the first computer system is configured to receive another command, determine the another command will cause the first fluid handing site to violate a constraint, and determine not execute the another command.	In the Accused System, the first computer system is configured to receive another command, determine the another command will cause the first fluid handing site to violate a constraint, and determine not to execute the another command. *See, e.g.*: *See* claim 1 above. An example constraint (for a motor) shown in the schematic below can be stored in the first computer system. The first computer system determines the other command will cause the first fluid handing site to violate the constraint, and determines not to execute the other command.

U.S. Patent No. 11,294,403	The Accused System
	 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

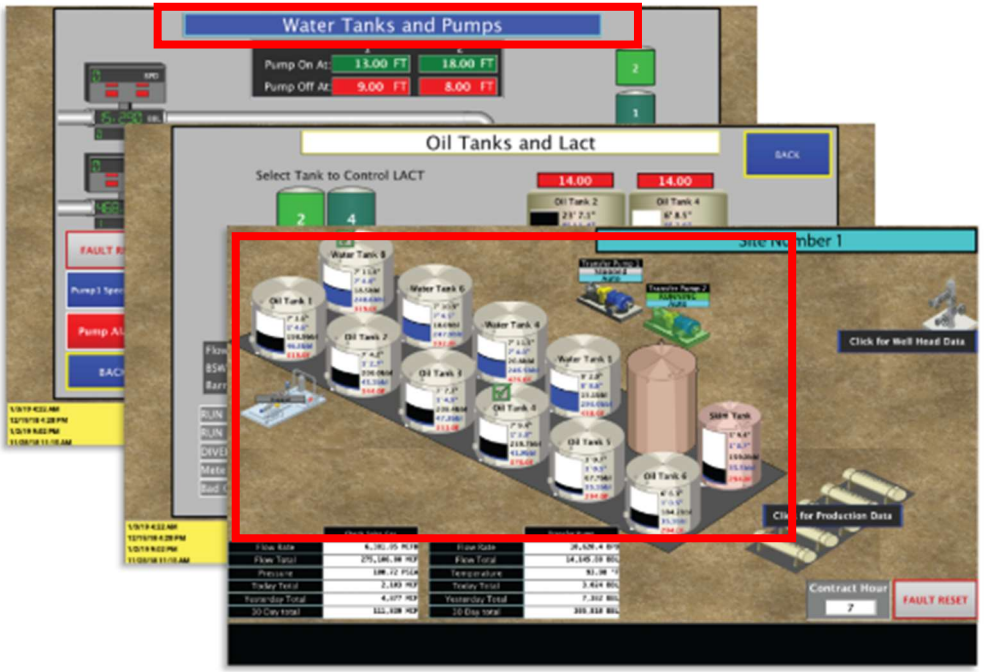
U.S. Patent No. 11,294,403	The Accused System
	manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 24	
[24] The system of claim 1, wherein the sequence of different target states that change over time are configured to cause the valve to open and close to release the valve from a position in which the valve is stuck.	In the Accused System, the sequence of different target states that change over time are configured to cause the valve to open and close to release the valve from a position in which the valve is stuck. *See, e.g.*: *See* claim 1 above.  Exhibit 3.

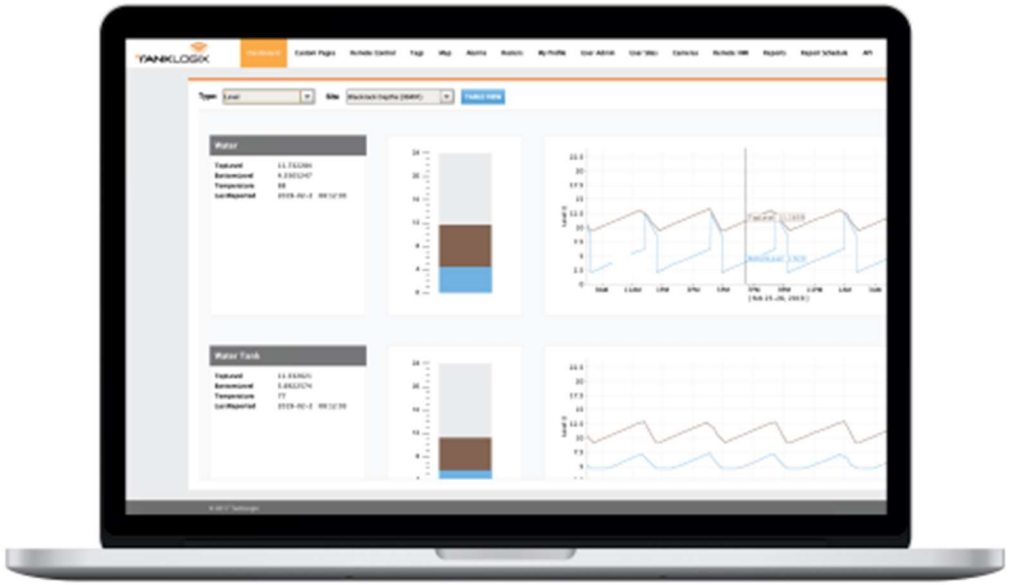
U.S. Patent No. 11,294,403	The Accused System
	TANKLOGIX Produced Wastewater This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate 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. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that, upon information and belief, change the state of the first valve to a sequence of target states over time to effectuate a command such that a stuck valve is released. 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

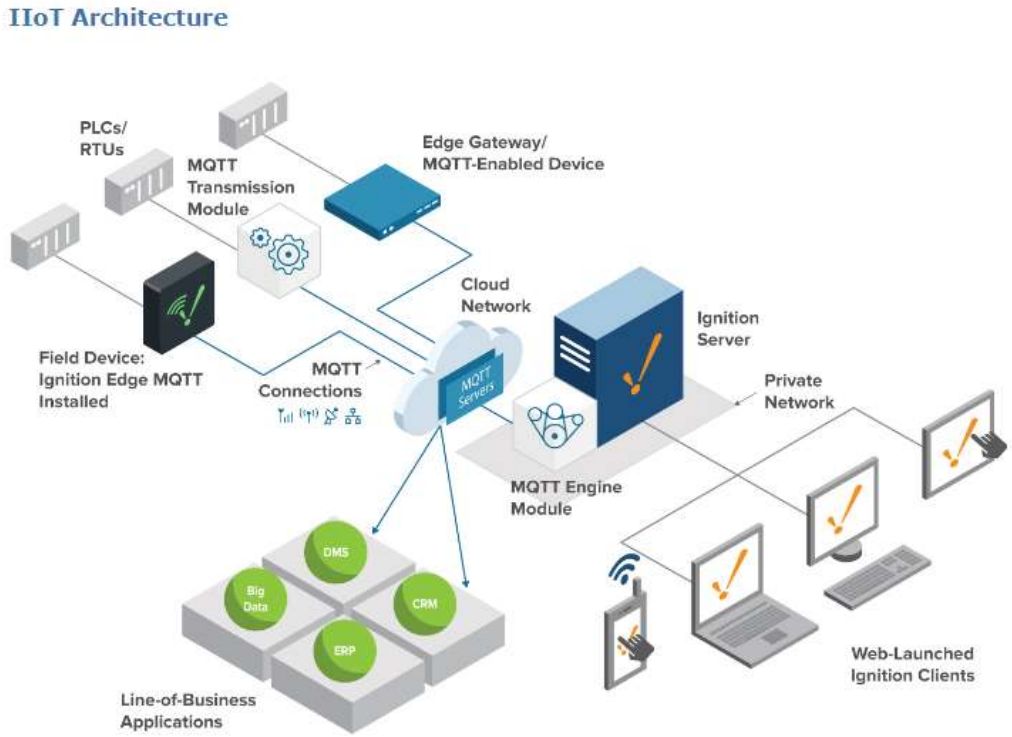
U.S. Patent No. 11,294,403	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 25	
[25] The system of claim 1, comprising: a second computer system disposed at a second fluid handling site that is remote from the first fluid handling site, the first fluid handling site being an oil or gas well and the second fluid handling site being a saltwater disposal facility, the second computer system being configured to control a second pump or a second valve at the second facility responsive to commands from the server system.	The Accused System comprises a second computer system disposed at a second fluid handling site that is remote from the first fluid handling site, the first fluid handling site being an oil or gas well and the second fluid handling site being a saltwater disposal facility, the second computer system being configured to control a second pump or a second valve at the second facility responsive to commands from the server system. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1  Exhibit 3.

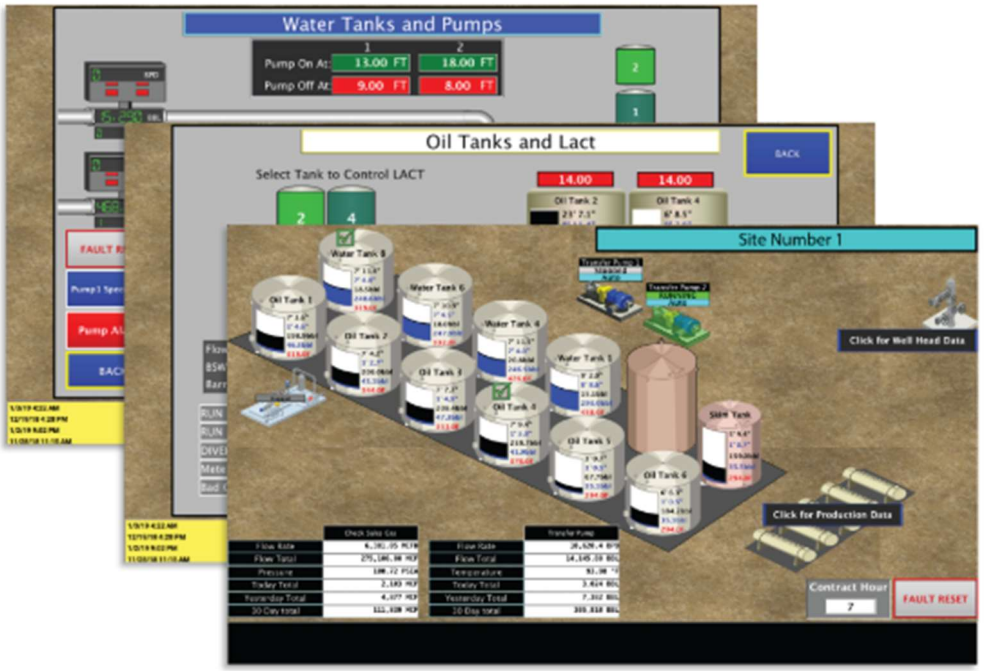
U.S. Patent No. 11,294,403	The Accused System
	The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused System operates in a manner that satisfies both the substantially-same-function/way/result test and the 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 26	
[26] The system of claim 1, wherein: receiving a first fluid level sensed by the fluid-level sensor comprises receiving a buffered fluid level reading pushed by the first computer system to the server system along with alarms and measurements from other sensors, the other sensors including a temperature sensor and a pressure sensor.	In the Accused System, receiving a first fluid level sensed by the fluid-level sensor comprises receiving a buffered fluid level reading pushed by the first computer system to the server system along with alarms and measurements from other sensors, the other sensors including a temperature sensor and a pressure sensor. *See, e.g.*: *See* claim 1 above.

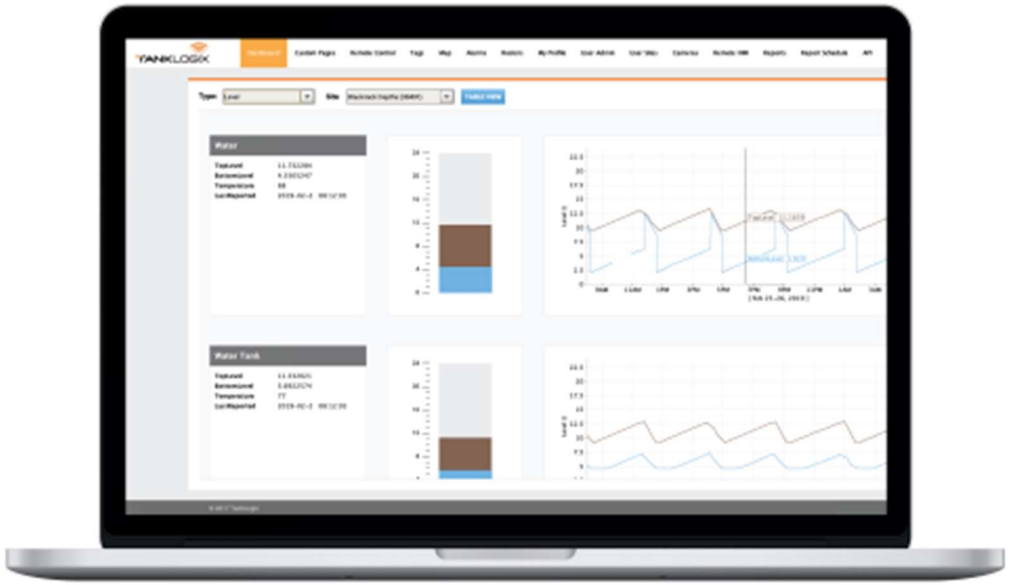
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1

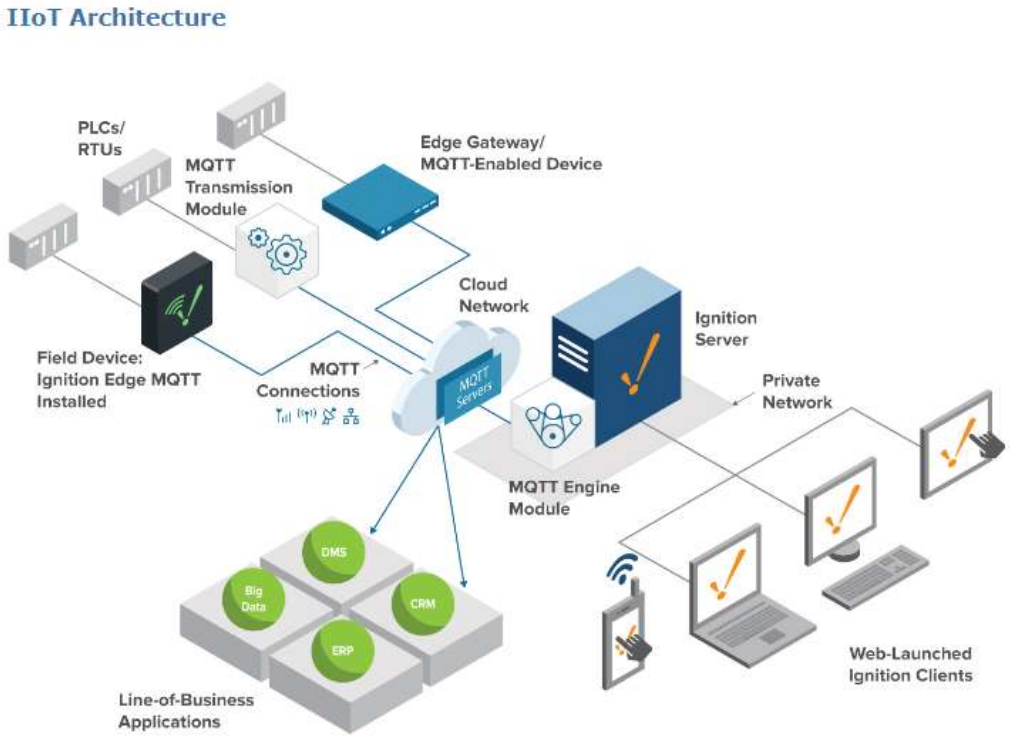
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1

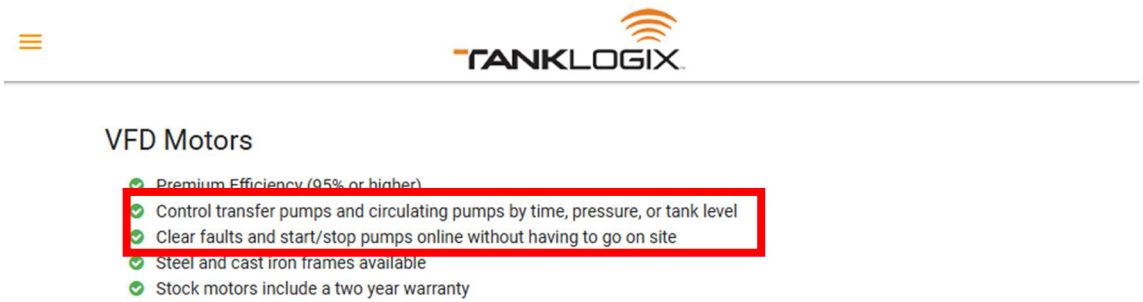
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2. The buffered fluid level reading is pushed by the first computer system to the server system along with alarms and measurements from other sensors. • **Alarm Journal** - The Alarm Journal will store all alarm events locally for one week of events. There are limited configuration options; the Alarm Journal can be accessed via the Edge Alarm Journal profile. Exhibit 8

U.S. Patent No. 11,294,403	The Accused System
	On information and belief, the other sensors include a pressure sensor (and necessarily, a temperature sensor) as shown by the readings on the interface provided by 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 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 27	
[27] The system of claim 1, wherein: receiving a first fluid level sensed by the fluid-level sensor comprises receiving a buffered fluid level reading pulled by the server system from the first computer system along with alarms and measurements from other sensors, the other sensors including a temperature sensor and a pressure sensor.	In the Accused System, receiving a first fluid level sensed by the fluid-level sensor comprises receiving a buffered fluid level reading pulled by the server system from the first computer system along with alarms and measurements from other sensors, the other sensors including a temperature sensor and a pressure sensor. *See, e.g.*: *See* claim 1 above.

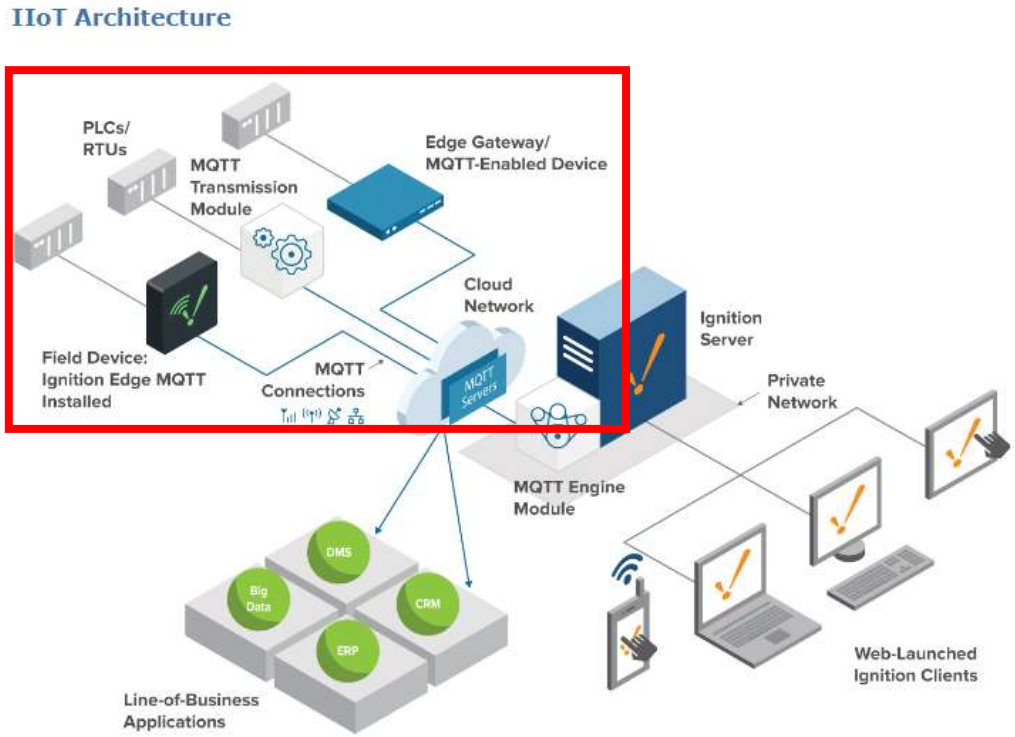
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1

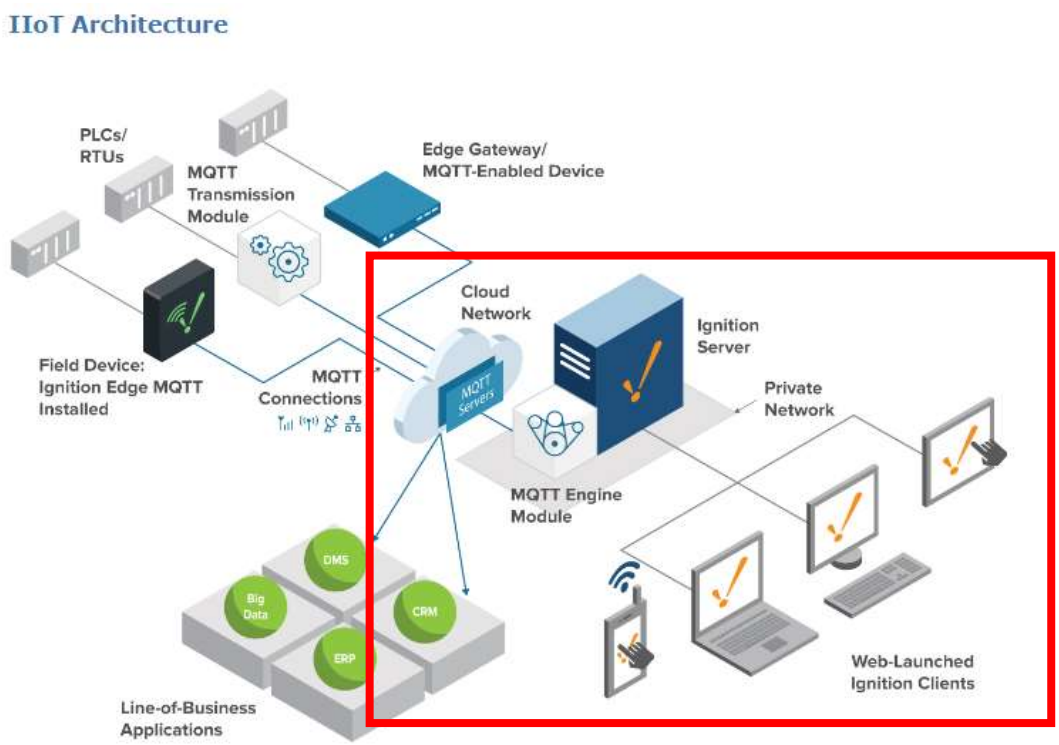
U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 1

U.S. Patent No. 11,294,403	The Accused System
	 Exhibit 2. The buffered fluid level reading is pushed by the first computer system to the server system along with alarms and measurements from other sensors. • **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. Exhibit 8

U.S. Patent No. 11,294,403	The Accused System
	On information and belief, the other sensors include a pressure sensor (and necessarily, a temperature sensor) as shown by the readings on the interface provided by 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 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 28	
[28] The system of claim 1, comprising: a controller by which the first computer system is coupled to an actuator of the first pump or valve, wherein the controller is configured to exercise feedback control of the actuator according to setpoints corresponding to respective target states of the sequence of different target states.	The Accused System comprises a controller by which the first computer system is coupled to an actuator of the first pump or valve, wherein the controller is configured to exercise feedback control of the actuator according to setpoints corresponding to respective target states of the sequence of different target states. *See, e.g.*: *See* claim 1 above.  Exhibit 3.

U.S. Patent No. 11,294,403	The Accused System
	On information and belief, the Accused System comprises a controller that exercises feedback control of the actuator to change a state of the pump driven by the VFD. 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. 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 29	
[29.1] The system of claim 1, wherein: the first computer system comprises a site master controller;	In the Accused System, the first computer system comprises a site master-controller. *See, e.g.*: *See* claim 1 above.

U.S. Patent No. 11,294,403	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 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. 11,294,403	The Accused System
[29.2] the server system comprises a command-center server configured to provide user interfaces by which a plurality of users monitor and control a plurality of different site master controllers, including the site master controller of the first computer system, associated with a plurality of different accounts.	In the Accused System, the server system comprises a command-center server configured to provide user interfaces by which a plurality of users monitor and control a plurality of different site master controllers, including the site master controller of the first computer system, associated with a plurality of different accounts. *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

U.S. Patent No. 11,294,403	The Accused 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 30	
[30.1] A system, comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a system. *See, e.g.*, claim element 1.1.
[30.2] a first computer system disposed at a first fluid handling site, the first fluid handling site comprising a first pump, a first valve, and a first tank that handle a first fluid, the first tank having a first fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the first fluid in the first tank, and the first computer system being configured to provide remote control of the first pump or the first valve; and	The Accused System includes a first computer system disposed at a first fluid handling site, the first fluid handling site comprising a first pump, a first valve, and a first tank that handle a first fluid, the first tank having a first fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the first fluid in the first tank, and the first computer system being configured to provide remote control of the first pump or the first valve. *See, e.g.*, claim element 1.2.
[30.3] a server system remote from the fluid handling site, wherein the server system has memory storing instructions that, when executed, effectuate operations comprising:	The Accused System includes a server system remote from the fluid handling site, wherein the server system has memory storing instructions that, when executed, effectuate operations. *See, e.g.*, claim element 1.3.

U.S. Patent No. 11,294,403	The Accused System
[30.4] receiving, with the server system, from the first computer, via a network, a first fluid level sensed by the fluid-level sensor;	The Accused system performs receiving, with the server system, from the first computer, via a network, a first fluid level sensed by the fluid-level sensor. *See, e.g.*, claim element 1.4.
[30.5] obtaining, with the server system, credentials from a first client computing device;	The Accused system performs obtaining, with the server system, credentials from a first client computing device. *See, e.g.*, claim element 1.5.
[30.6] 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 performs 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. *See, e.g.*, claim element 1.6.
[30.7] 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 level, the first client computing device being remote from the server system and the first computer system;	The Accused system performs 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 level, the first client computing device being remote from the server system and the first computer system. *See, e.g.*, claim element 1.7.
[30.8] receiving, with the server system, from the first client computing device,	The Accused system performs receiving, with the server system, from the first client computing device, a first command to change a state of the first pump.

U.S. Patent No. 11,294,403	The Accused System
a first command to change a state of the first pump; and	*See, e.g.*, claim element 1.8.
[30.9] 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 pump to a sequence of different target states that change over time, wherein:	The Accused system performs 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 pump to a sequence of different target states that change over time. *See, e.g.*, claim element 1.9.
[30.10] the a first fluid handling site comprises a second pump and a second tank that handle a second fluid, the second tank having a second fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the second fluid in the second tank, and the first computer system being configured to provide remote control of the second pump;	In the Accused System, the first fluid handling site comprises a second pump and a second tank that handle a second fluid, the second tank having a second fluid-level sensor with which the first computer system is configured to communicate to obtain a level of the second fluid in the second tank, and the first computer system being configured to provide remote control of the second pump. *See, e.g.*, claim 2.
[30.11] the first tank, the first pump, the first valve, the second tank, and the second pump, wherein the first fluid is water and the second fluid is oil, wherein the first tank or the second tank is an oil/water separation tank; and	The Accused system comprises the first tank, the first pump, the first valve, the second tank, and the second pump, wherein the first fluid is water and the second fluid is oil, wherein the first tank or the second tank is an oil/water separation tank. *See, e.g.*, claim 3.

U.S. Patent No. 11,294,403	The Accused System
[30.12] 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, the different fluid-handling devices including the first pump.	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, the different fluid-handling devices including the first pump. *See, e.g.*, claim 9.

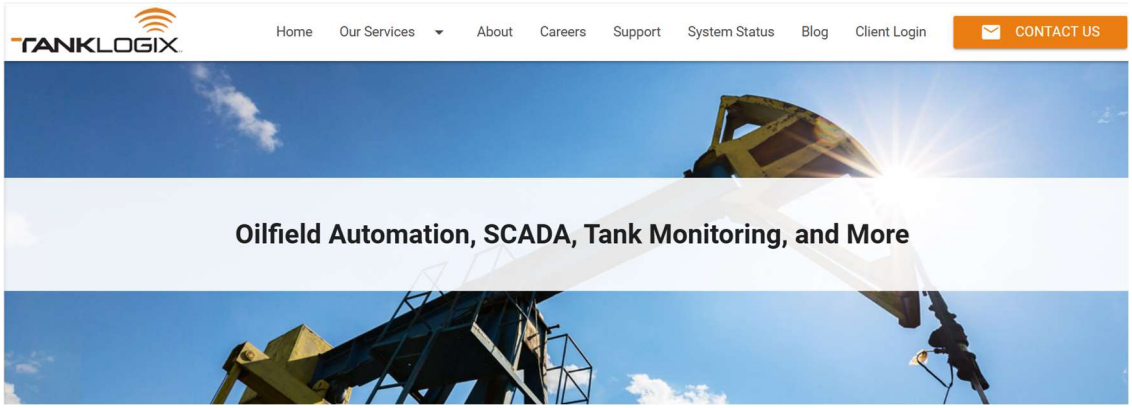
Exhibit D

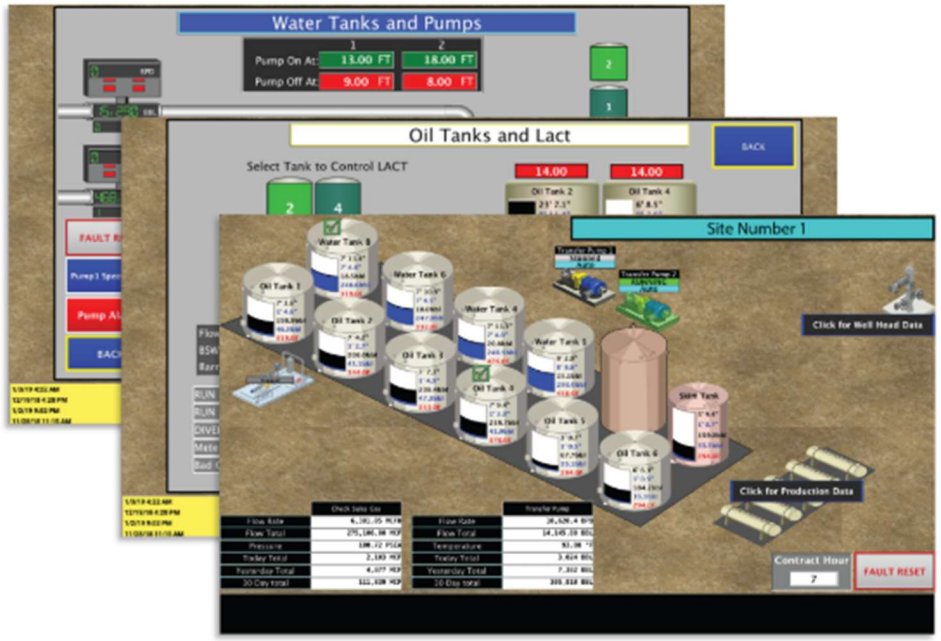
Infringement Analysis of U.S. Patent No. 12,019,461 Against the TankLogix Ignition-Hosted Automation System Implemented by TankLogix

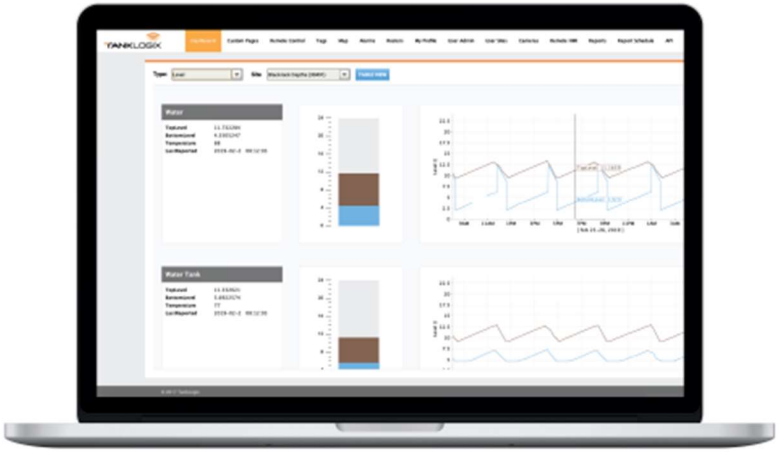
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System(s) each element of claims 1-17 of U.S. Patent No. 12,019,461 (the "'461 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") developed, implemented, maintained, sold, offered for sale, used, made, or imported into the U.S. by TankLogix, LLC.

References Cited:

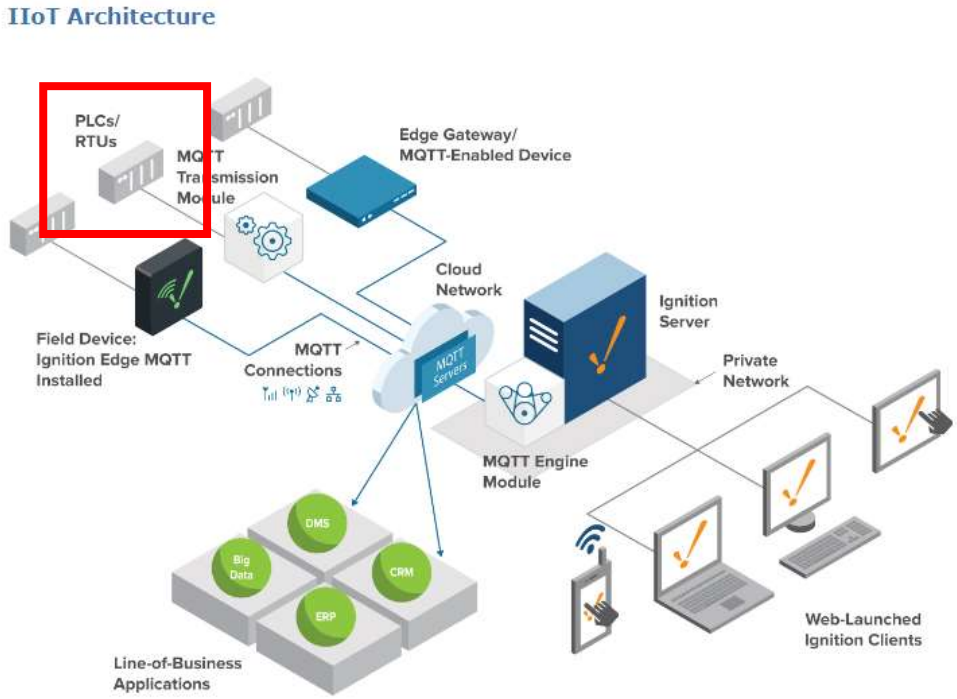
- Exhibit 1, https://www.tanklogix.com/hosted-ignition/.
- Exhibit 2, https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture.
- Exhibit 3, https://tanklogix.com/oilfield-automation/.
- Exhibit 4, https://tanklogix.com/vfd-controls-and-motors/.
- Exhibit 5, https://mqtt.org/.
- 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.

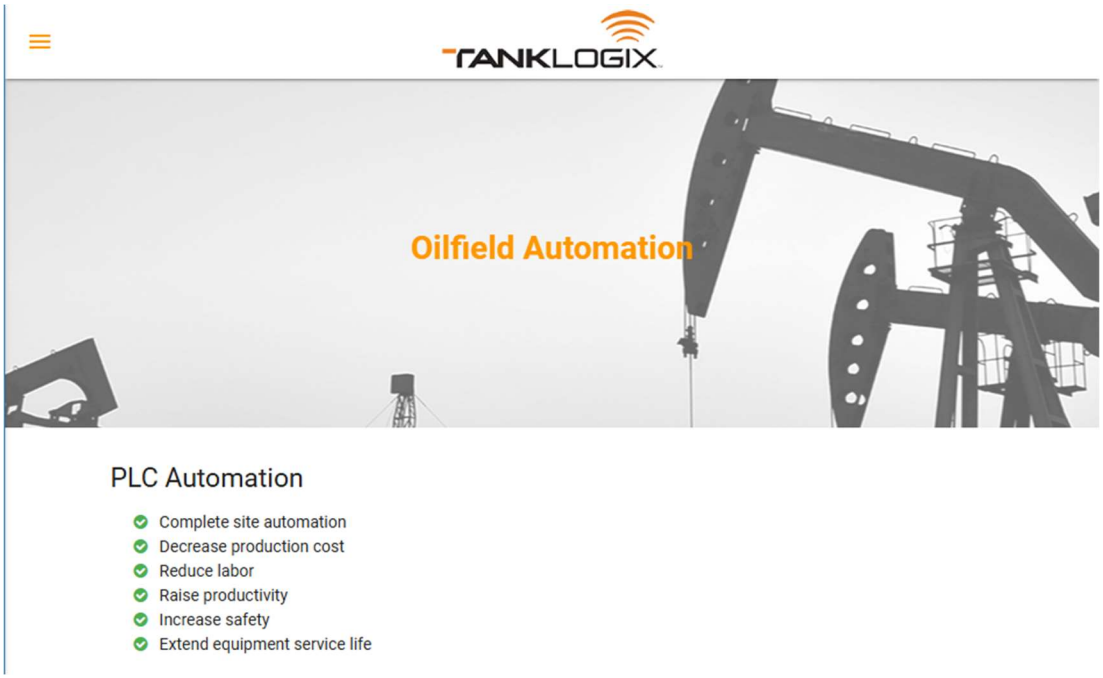
U.S. Patent No. 12,019,461	The Accused System
Claim 1	
[1.1] A fluid processing method, comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a fluid processing method. *See, e.g.*:  Exhibit 7.
[1.2] receiving, with a first computer system disposed at a first fluid-handling site, 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, 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;	The Accused System comprises receiving, with a first computer system disposed at a first fluid-handling site, 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, 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. *See, e.g.*:

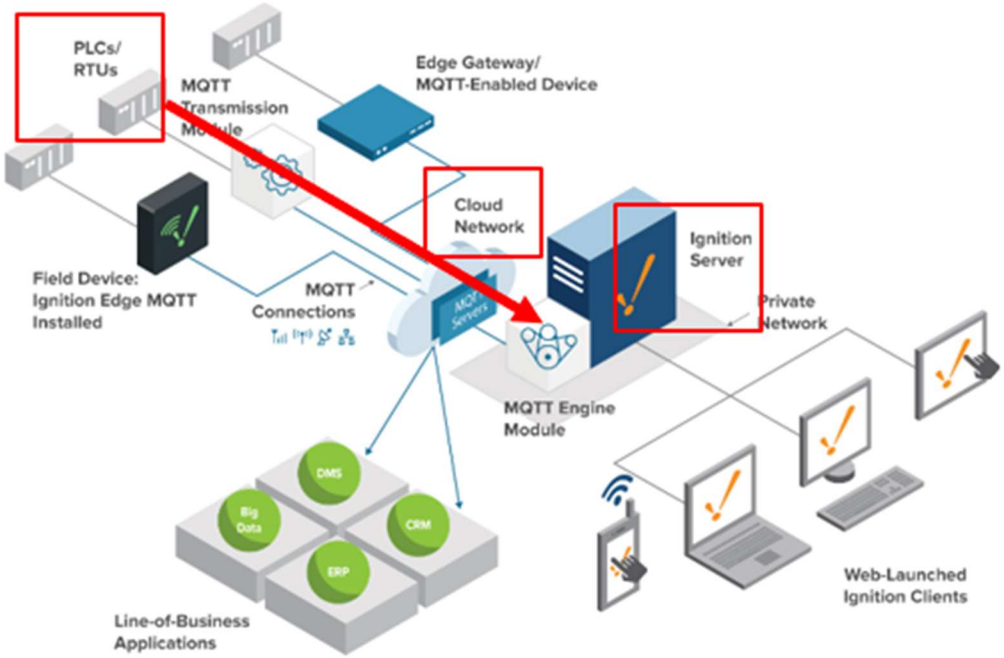
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 1.

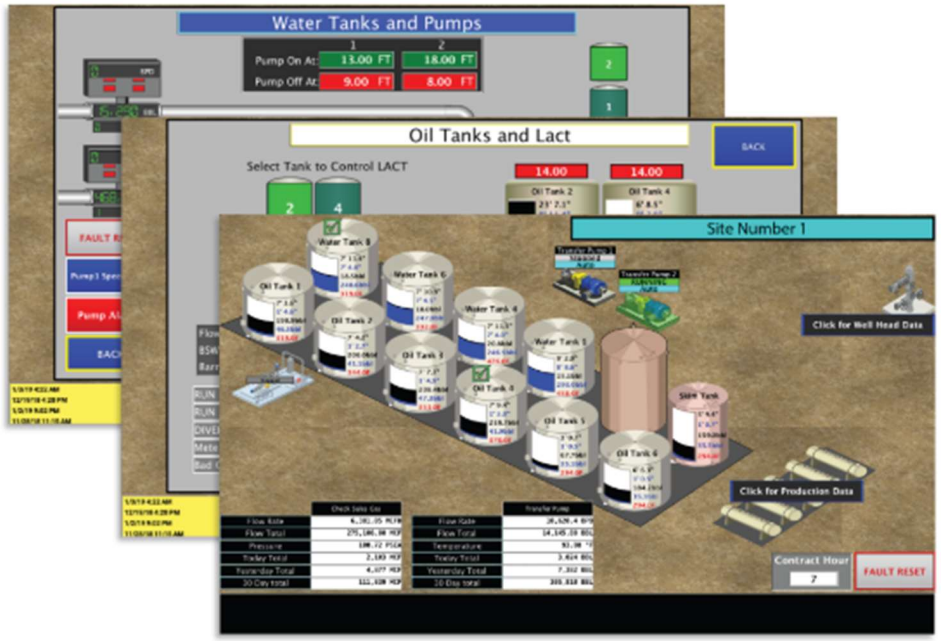
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 1.

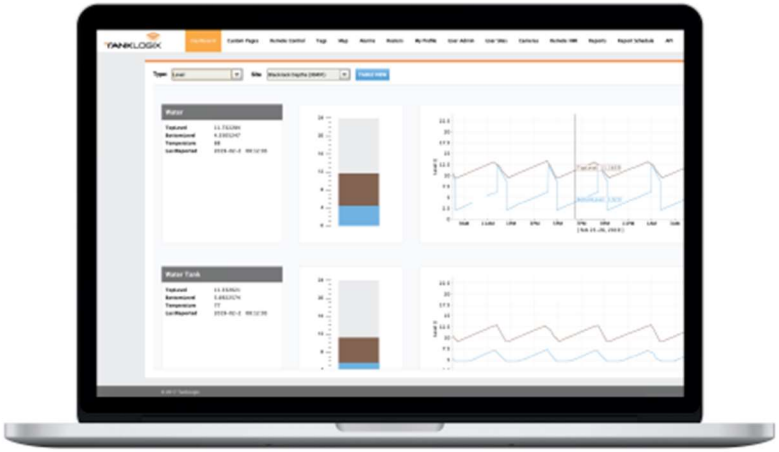
U.S. Patent No. 12,019,461	The Accused System
	TANKLOGIX Produced Wastewater This excess water slows production because the tanks that are used to store the water become full. Therefore, no oil or gas can be produced because there is no place to store the water. The TankWarden System can help automate 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.

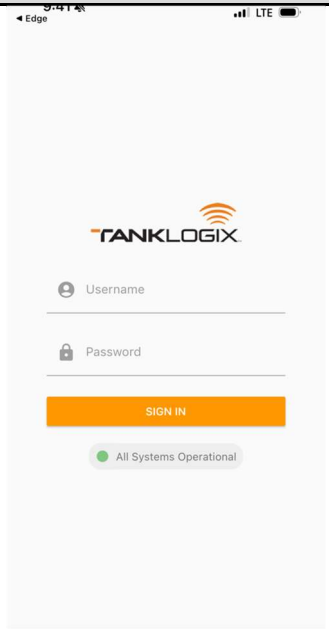
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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 source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

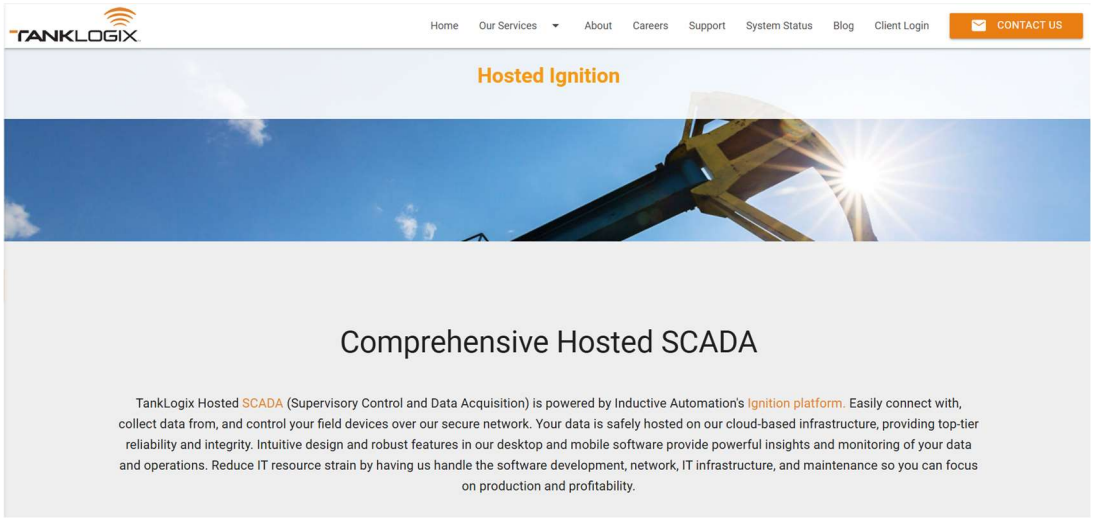
U.S. Patent No. 12,019,461	The Accused System
[1.3] providing, with the first computer system disposed at a first fluid handling site, remote control of a first fluid-handling device of the one or more fluid-handling devices;	The Accused System comprises providing, with the first computer system disposed at a first fluid handling site, remote control of a first fluid-handling device of the one or more fluid-handling devices. *See, e.g.*:  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

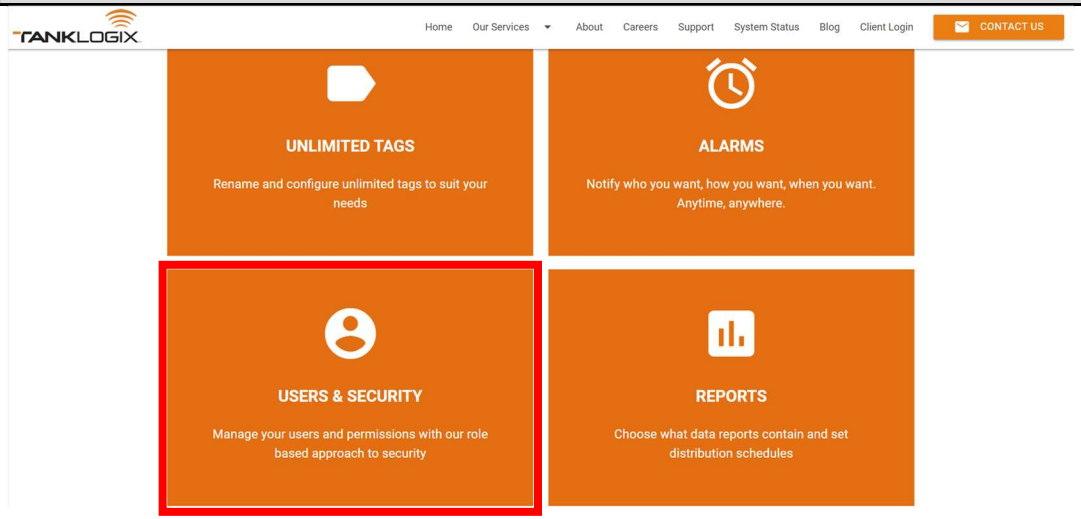
U.S. Patent No. 12,019,461	The Accused System
	source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.4] receiving, with a server system, from the first computer system, via a network, a first fluid 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 comprises 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. *See, e.g.*:  Exhibit 2.

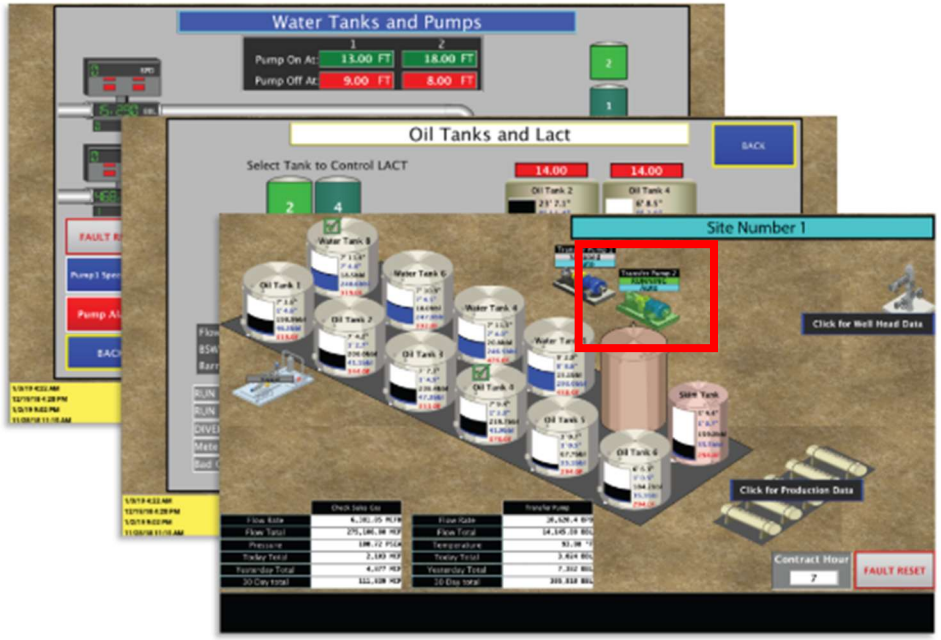
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 1.

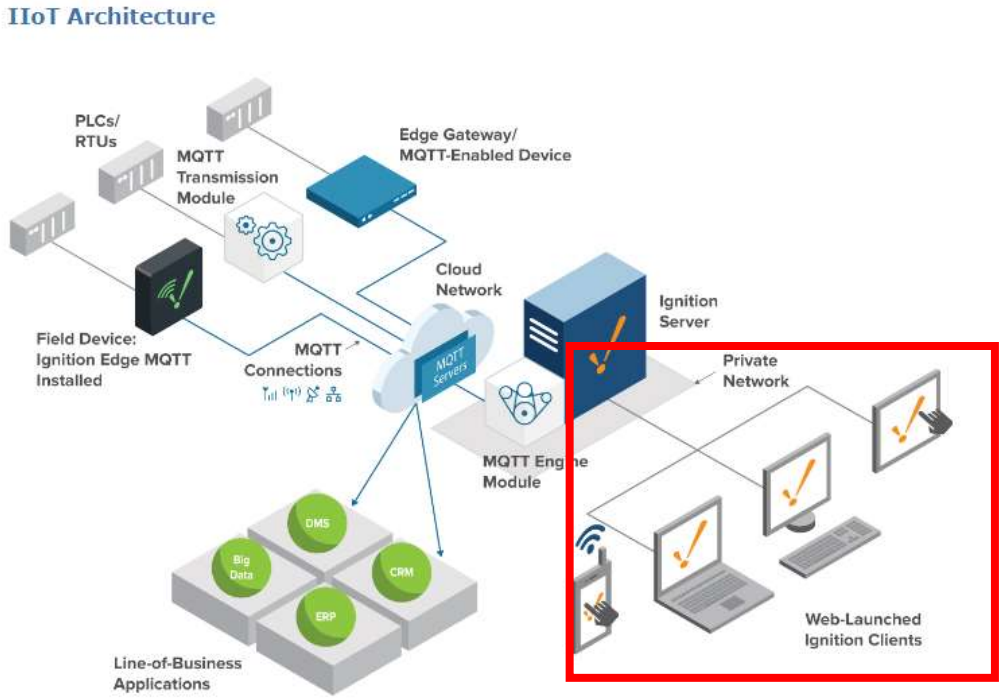
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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.
[1.5] obtaining, with the server system, credentials from a first client computing device;	The Accused System comprises obtaining, with the server system, credentials from a first client computing device. *See, e.g.*:

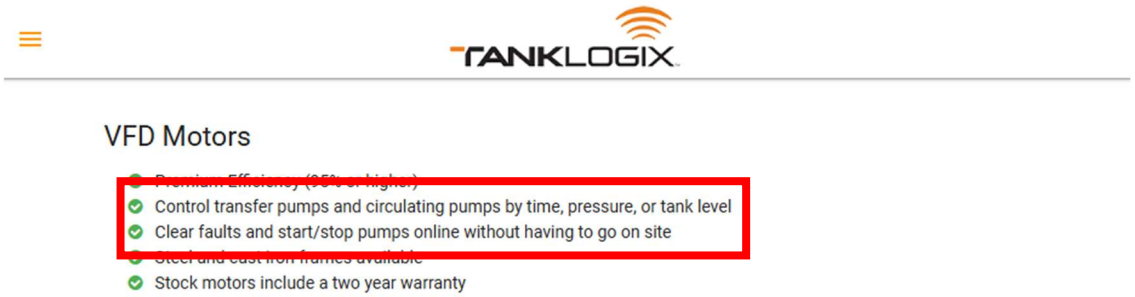
U.S. Patent No. 12,019,461	The Accused System
	 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the 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.
[1.6] 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	The Accused System comprises determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with

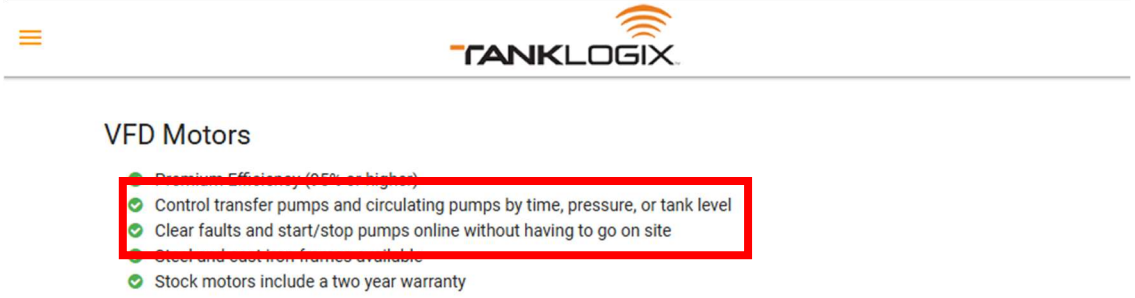
U.S. Patent No. 12,019,461	The Accused System
fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact;	the first fluid handling site, wherein the server system hosts data about other fluid handling sites the user is not authorized to interact. *See, e.g.*:  Exhibit 1

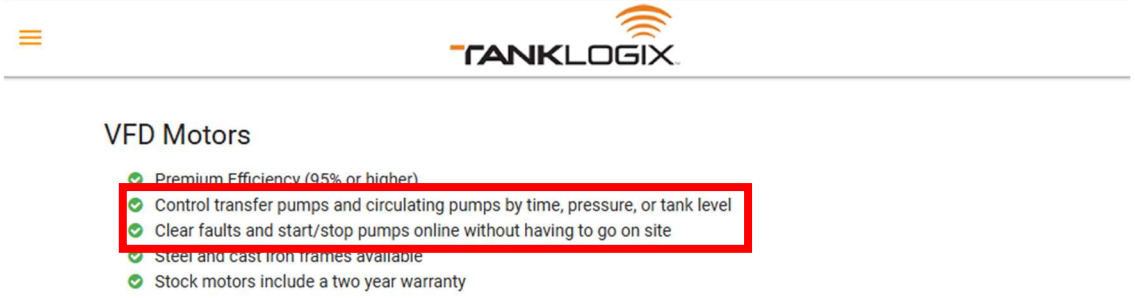
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 1 The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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.
[1.7] after the determination, providing, with the server system, via the network, information by which the first client computing device presents a user interface indicating the first fluid property, the first client computing	The Accused System comprises after the determination, providing, with the server system, via the network, information by which the 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.*:

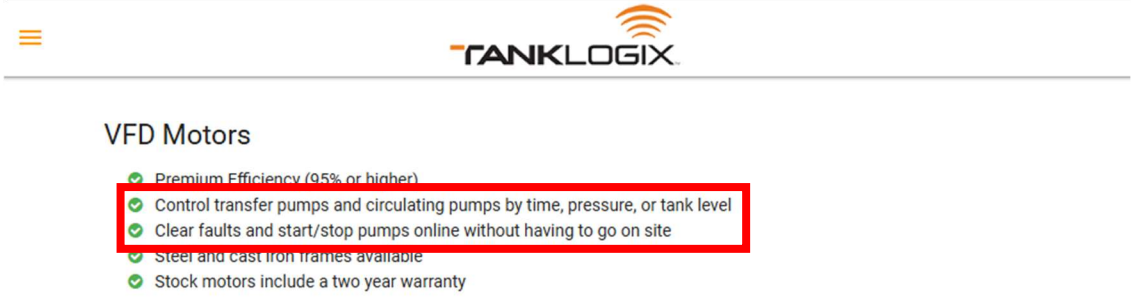
U.S. Patent No. 12,019,461	The Accused System
device being remote from the server system and the first computer system;	 Exhibit 1.

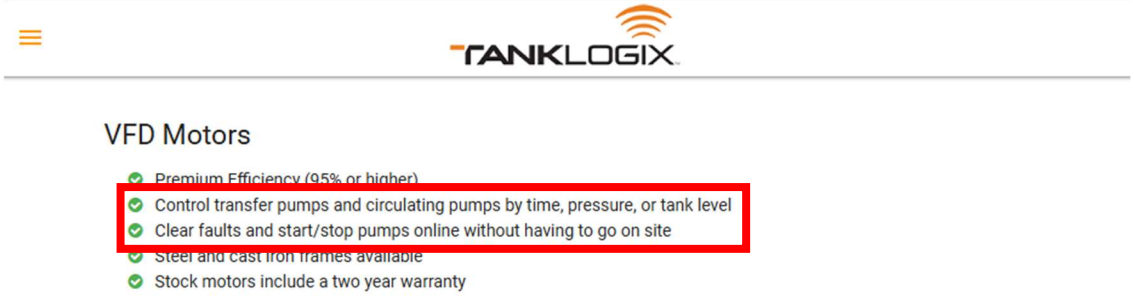
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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 source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

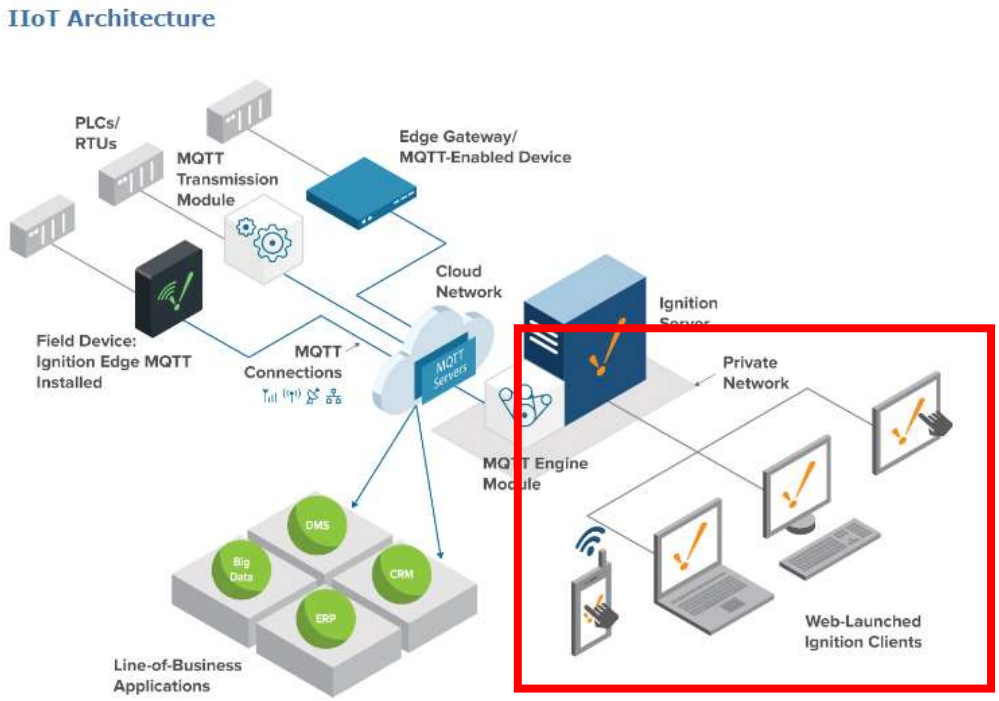
U.S. Patent No. 12,019,461	The Accused System
[1.8] receiving, with the server system, from the first client computing device, a first command to change a state of the first fluid-handling device; and	The Accused System comprises receiving, with the server system, from the first client computing device, a first command to change a state of the first fluid-handling device. *See, e.g.*:  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.
[1.9] 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 comprises 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. *See, e.g.*:

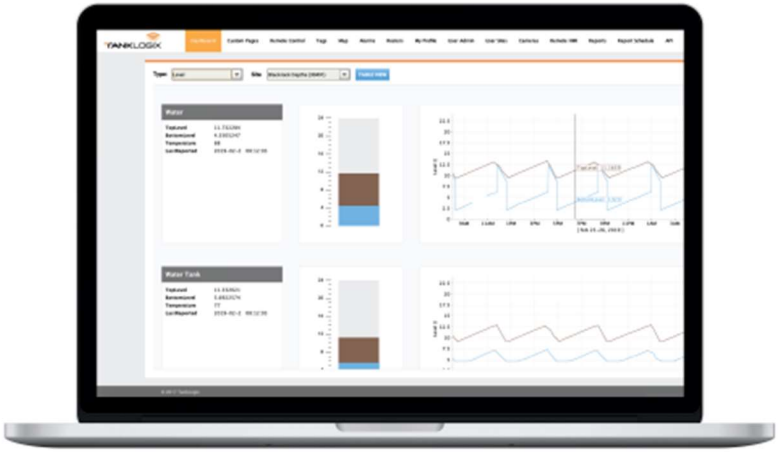
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 4. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command. 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 2	
[2] The method 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.

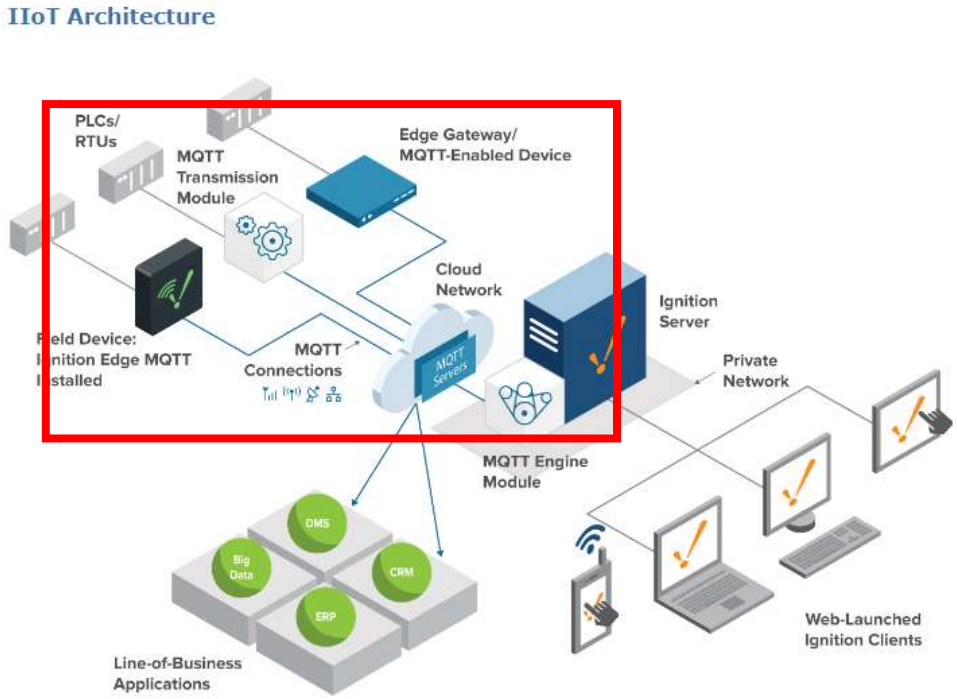
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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.
Claim 3	
[3] The method 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 pump.	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 pump. *See, e.g.*: *See* claim 1 above.

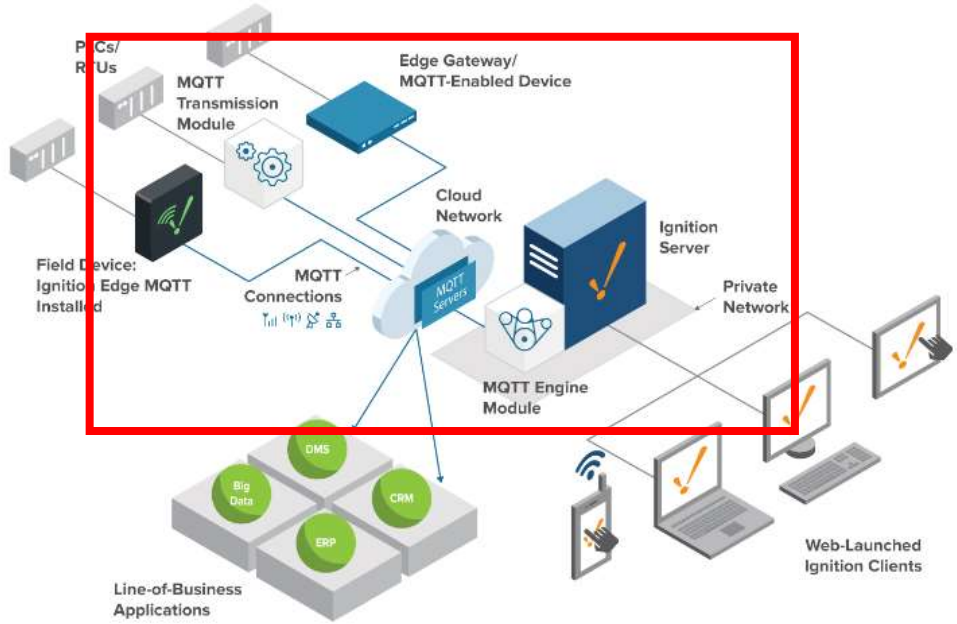
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 4. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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.
Claim 4	
[4] The method 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, wherein the first fluid property corresponds to a level of the first fluid in the first tank. *See, e.g.*: *See* claim 1 above.

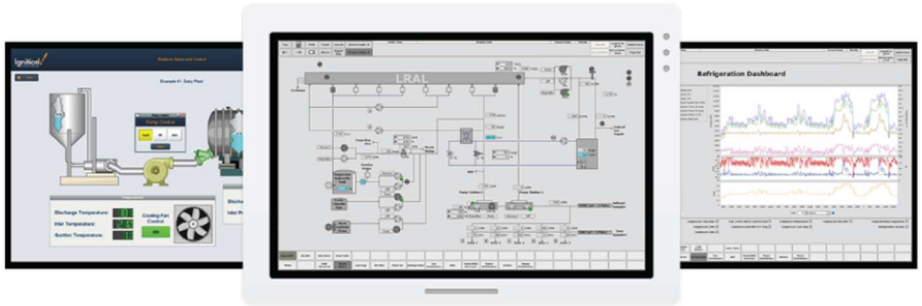
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 4. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command. *See also, 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 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 method 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	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.*:

U.S. Patent No. 12,019,461	The Accused System
computing device to present the user interface indicating the first fluid property, wherein the first fluid property corresponds to a first fluid level.	*See* claim 1 above.  Exhibit 2.

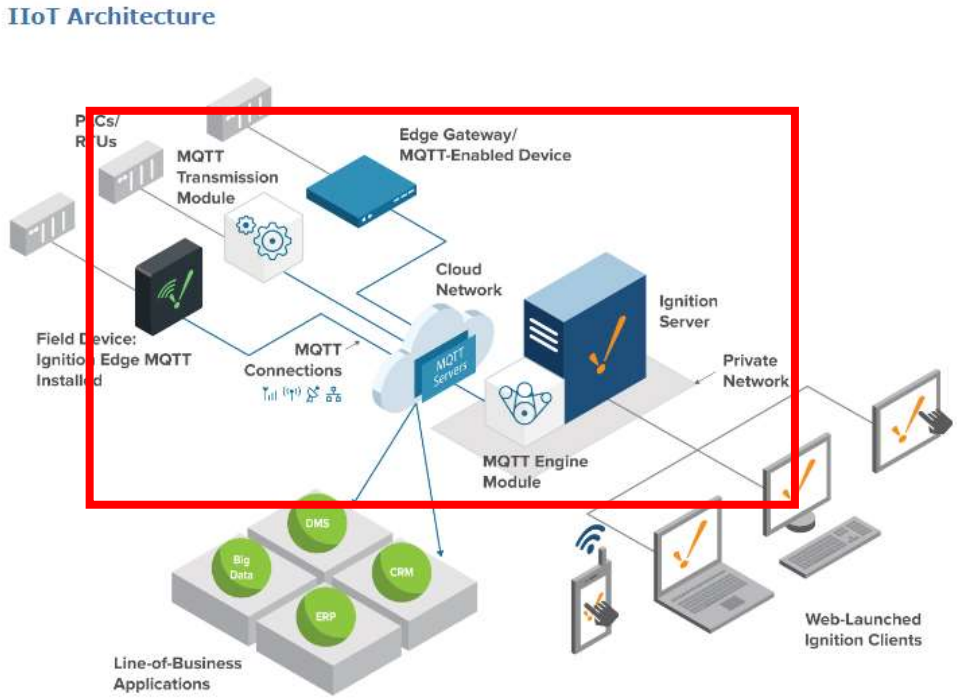
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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.
Claim 6	
[6] The method 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.

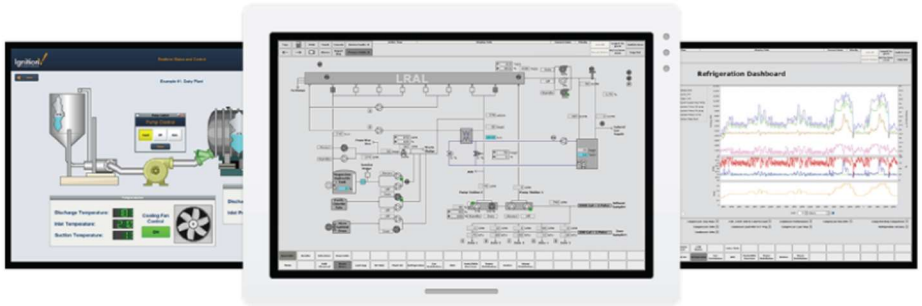
U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 2. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result 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 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	

U.S. Patent No. 12,019,461	The Accused System
[7] The method 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. IIoT Architecture  Exhibit 2

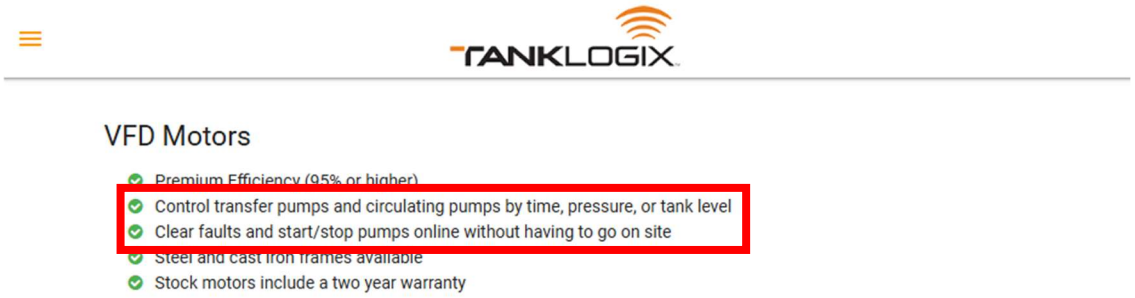
U.S. Patent No. 12,019,461	The Accused System
	Web-based HMI and SCADA applications deployment Using web technologies, you can access PLCs and connect to SQL databases on any platform. Ignition provides the common HMI/SCADA capabilities, but in an easier and more efficient way. Create runtime clients 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 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. 12,019,461	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 method 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 9:61-67 of the ’461 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. 12,019,461	The Accused System
	 Exhibit 2

U.S. Patent No. 12,019,461	The Accused 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 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. 12,019,461	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 9	
[9] The method of claim 7, wherein the plurality of different formats and protocols comprise: modbus remote terminal unit protocol; and analog electrical signals.	In the Accused System, the plurality of different formats and protocols comprise: modbus remote terminal unit protocol; and analog electrical signals. *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. 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 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 method 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	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.*:

U.S. Patent No. 12,019,461	The Accused System
different target setpoints determined by the first computer system responsive to corresponding commands from the server system.	*See* claim 7 above.  Exhibit 4. As shown above, the Accused System includes VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that change the state of the first pump to a sequence of target states over time to effectuate a command. *See also, 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 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	
[11.1] The method of claim 7, wherein: the first computer system is coupled to at least some of the plurality of	In the Accused System, the first computer system is coupled to at least some of the plurality of different fluid-handling devices via a bus. *See, e.g.*:

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different fluid-handling devices via a bus; and	*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 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.
[11.2] 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.	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. An example of corresponding structure can be found at 7:4-7:23, 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

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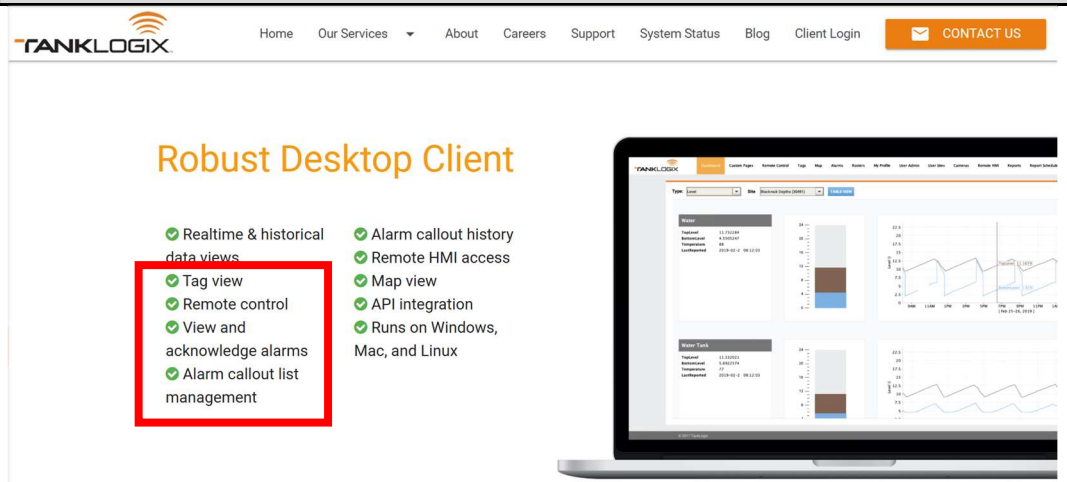
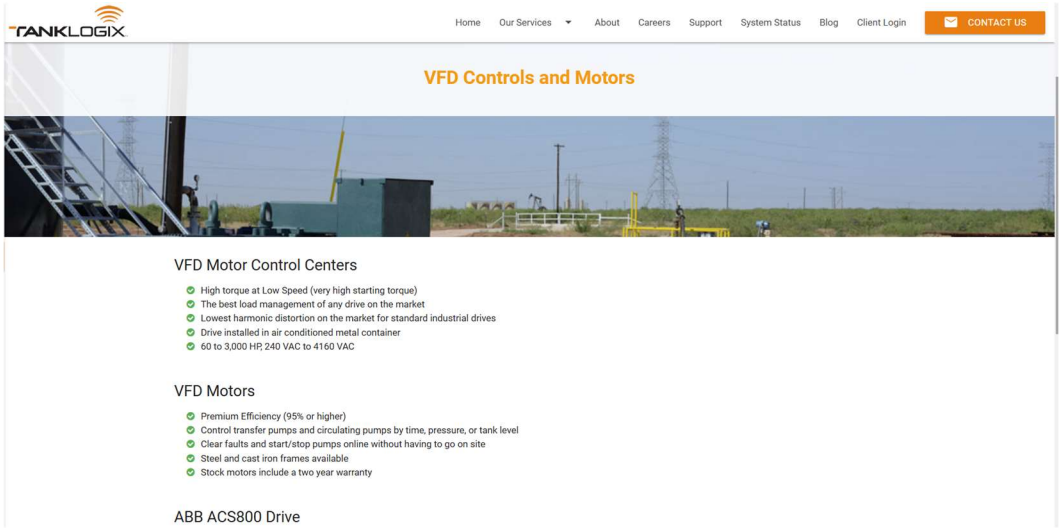
	interface that detects when a command is addressed to the respective fluid-handling device and stores the command for further processing, for example by a local controller 58 that implements the command. The Accused System implements the same function in a substantially similar way to a substantially similar result: 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 4.

U.S. Patent No. 12,019,461	The Accused 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.
Claim 12	
[12] The method of claim 7, wherein the plurality of different formats and protocols comprise three different protocols communicated over three different types of control busses to	In the Accused System, the plurality of different formats and protocols comprise three different protocols communicated over three different types of control busses to corresponding fluid handling devices among the plurality of different fluid-handling devices. *See, e.g.*:

U.S. Patent No. 12,019,461	The Accused System
corresponding fluid handling devices among the plurality of different fluid-handling devices.	*See* claim 7 above.  Exhibit 4. 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 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	

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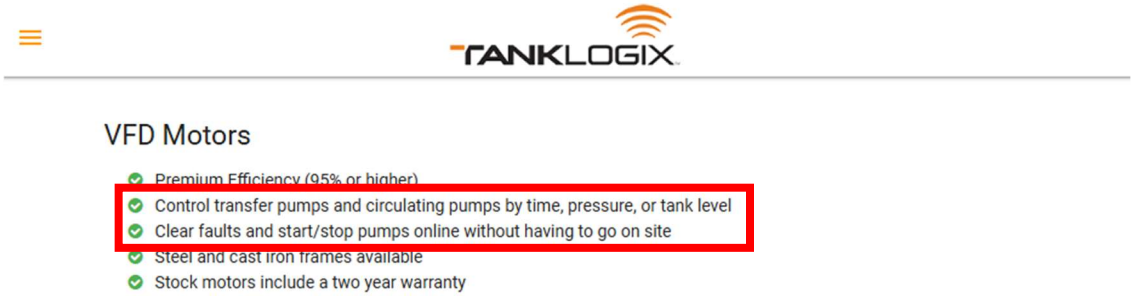
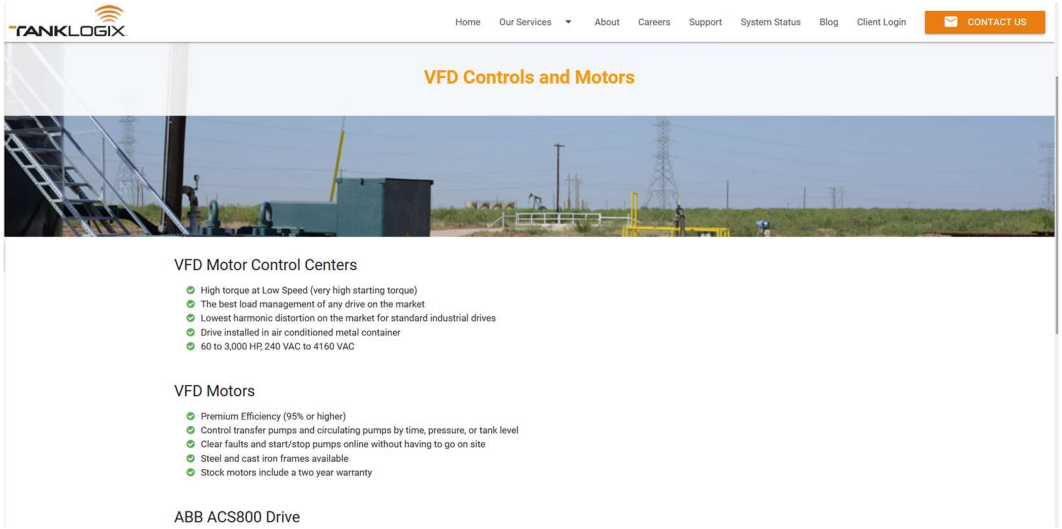
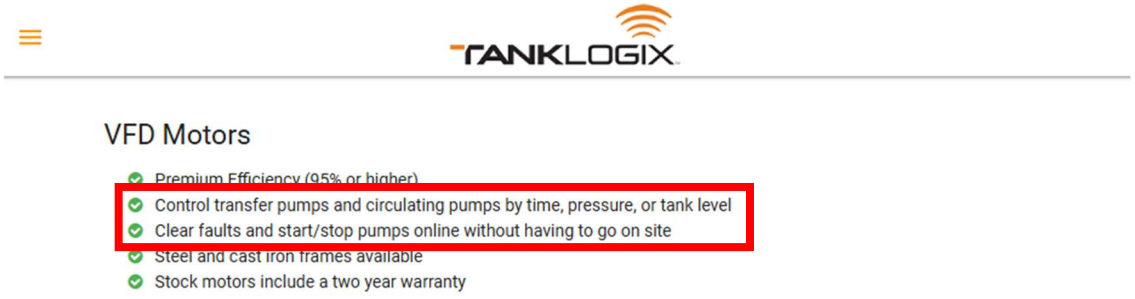
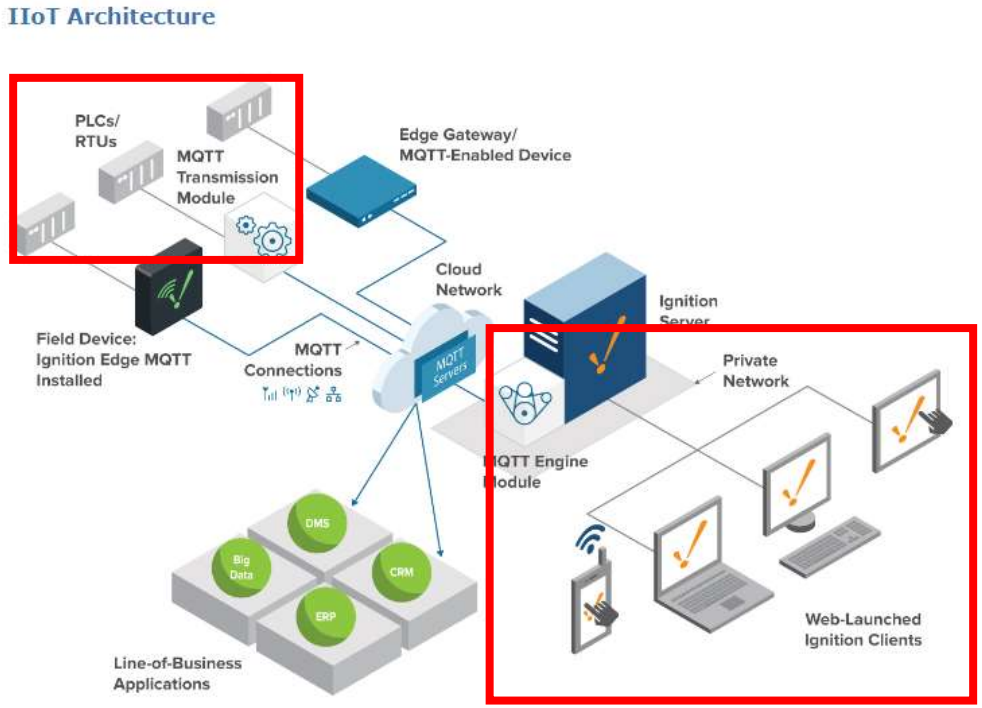
[13] The method of claim 7, wherein the plurality of different formats and protocols comprise command code format, an on-off signal format, and an application-program interface format.	In the Accused System, the plurality of different formats and protocols comprise command code format, an on-off signal format, and an application-program interface format. *See, e.g.*: *See* claim 7 above.  Exhibit 4. 

U.S. Patent No. 12,019,461	The Accused System
	Exhibit 4. 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 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 14	
[14] The method of claim 7, wherein the first computer system is configurable to operate in an automatic mode a mixed automatic mode, and a manual mode.	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.*: *See* claim 7 above.  Exhibit 4.

U.S. Patent No. 12,019,461	The Accused System
	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 form an initial state to the 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: ndling device 40 or 42 to change state.”

U.S. Patent No. 12,019,461	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 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	

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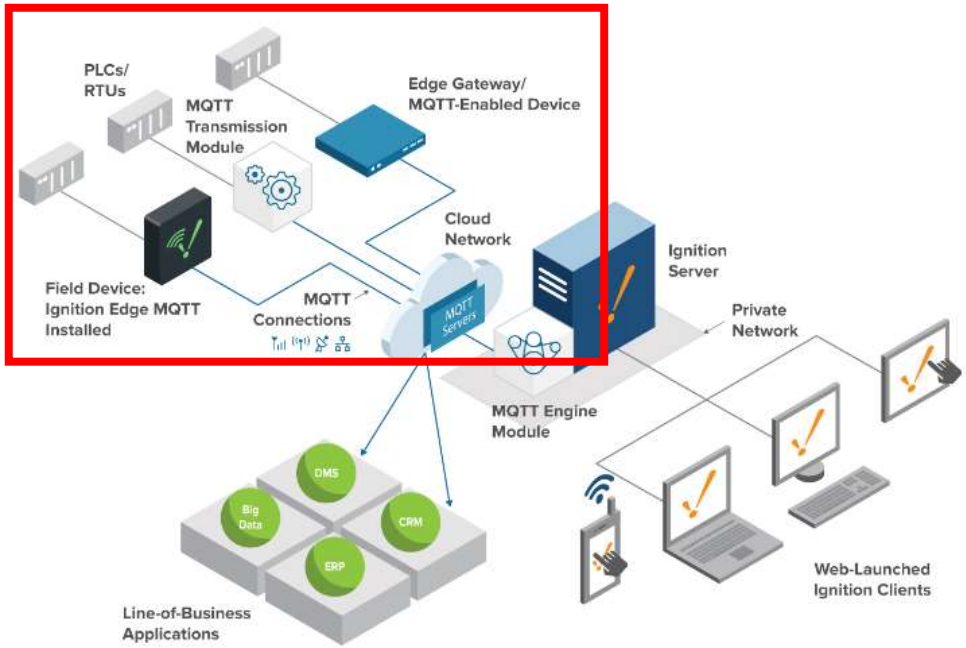
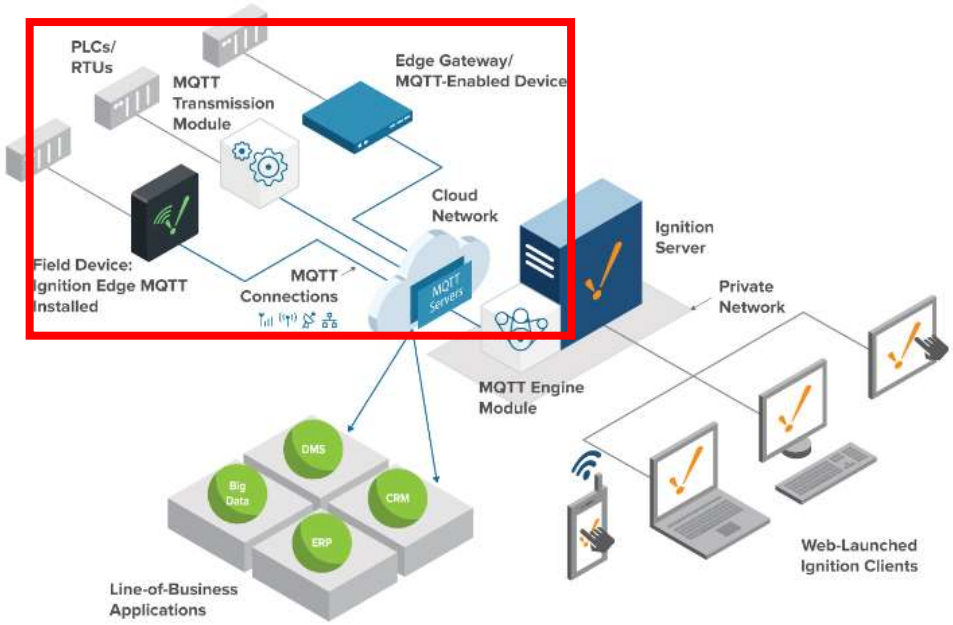
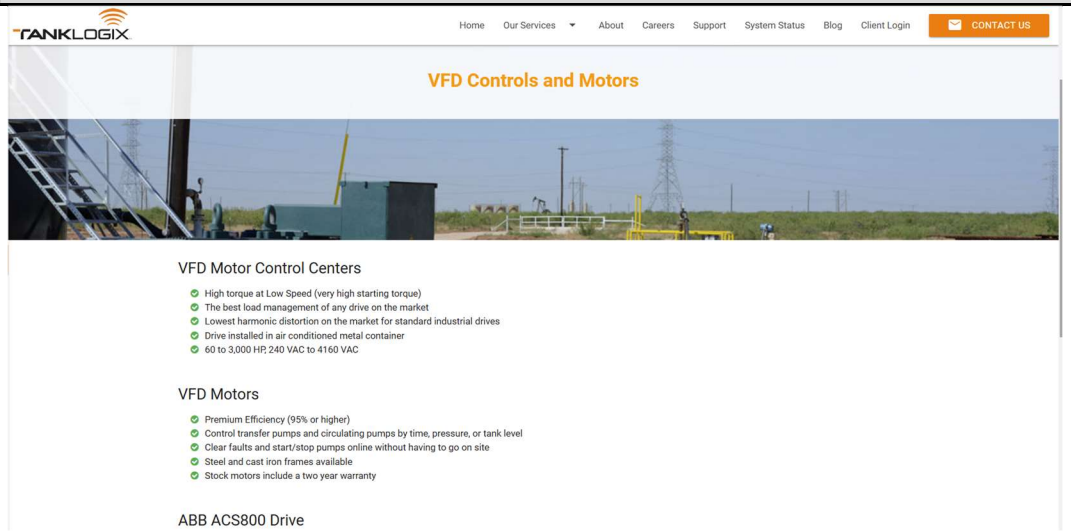
[15] The method of claim 7, wherein translating the plurality of commands comprises steps for identifying protocols and control busses.	In the Accused System, translating the plurality of commands comprises steps for identifying protocols and control busses. *See, e.g.*: *See* claim 7 above. The Accused System is configured to send the command to the network address of the controller (*see, e.g.*, claim element 1.4) 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 IIoT Architecture  Exhibit 2

U.S. Patent No. 12,019,461	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 16	
[16] The method 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.

U.S. Patent No. 12,019,461	The Accused System
	IIoT Architecture  Exhibit 2

U.S. Patent No. 12,019,461	The Accused System
	 Exhibit 4. 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 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	
[17.1] A method, comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a fluid processing method.

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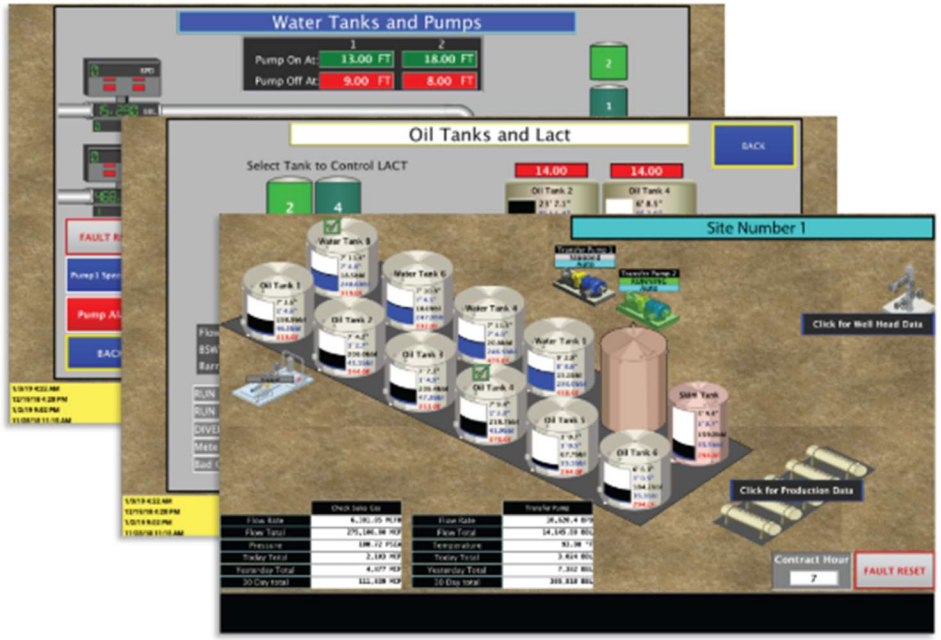
	See, e.g., claim element 1.1.
[17.2] measuring, with one or more sensors at a first fluid tank located at a first fluid-handling site, one or more properties associated with a first fluid;	The Accused System comprises measuring, with one or more sensors at a first fluid tank located at a first fluid-handling site, one or more properties associated with a first fluid. *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 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. 12,019,461	The Accused 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.
[17.3] 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 comprises 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. *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 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.
[17.4] 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 comprises 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. *See, e.g.* claim element 1.3. 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

U.S. Patent No. 12,019,461	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.
[17.5] 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 comprises 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. *See, e.g.* claim element 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 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.
[17.6] obtaining, with the server system, credentials from a first client computing device;	The Accused System comprises obtaining, with the server system, credentials from a first client computing device. *See, e.g.* claim element 1.5. 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.
[17.7] determining, with the server system, based on the credentials, that a	The Accused System comprises determining, with the server system, based on the credentials, that a user of the first client computing device is authorized to interact with

U.S. Patent No. 12,019,461	The Accused System
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 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 1.6. 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.
[17.8] after the determination, providing, with the server system, via the network, information by which the 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;	The Accused System comprises after the determination, providing, with the server system, via the network, information by which the 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.* 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 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.
[17.9] 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 comprises receiving, 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 1.8.

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	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.
[17.10] 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 comprises 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. *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 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.