

Exhibit C3

EXHIBIT C3 - U.S. PATENT 9,082,239
Infringement Claim Chart

U.S. Patent 9,082,239		Ford Infringing Activities¹
Row	Claim 1	Ford Vehicles Equipped with Intelligent Suggestions
1A	A method, comprising: maintaining, by a microprocessor executable profile identification module, a persona of a selected vehicle occupant, wherein the persona comprises one or more of bioinformatics, medical information, driving history, personal information, private information, travel information, and Internet browsing history and/or browsed content;	Ford has made, used, sold, offered for sale, and/or imported and is currently making, using, selling, offering for sale, and/or importing vehicles, vehicle systems (including in-vehicle infotainment systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Intelligent Suggestions in Ford vehicles, in certain makes and model years from the 2020 model year to the present, including those listed in Exhibit C2 (“the ‘239 C3 Accused Instrumentalities”). The ‘239 C3 Accused Instrumentalities each include a microprocessor executable profile identification module that maintains a persona of a vehicle occupant. The profile identification module may, among other things, receive requests from a user or device to access a profile stored in a profile database or profile data. The profile identification module may also request profile information from a user and/or a device to access a profile stored in a profile database or profile data. The patent specification describes a profile identification module at, for example, 49:44-50:9; 90:6-40; and Fig. 36. The persona of the vehicle occupant may be based on the occupant’s profile data, device data associated with the occupant, stored data, system data, and information related to the person as collected by the vehicle’s interior and exterior sensors. The ‘239 C3 Accused Instrumentalities create a personal profile for a vehicle occupant. The ‘239 C3 Accused Instrumentalities maintain a persona of the vehicle occupant which includes, for example, personal information (e.g., name, home address, personal and business contacts, phone call data), private information, driving history, and/or travel information. <u>Exemplary Sources²</u> https://www.youtube.com/watch?v=h3457G5mWF0

¹ These allegations are exemplary and AutoConnect reserves the right to supplement them as the case progresses through discovery and the claim construction process.

² The sources identified herein are merely exemplary.

EXHIBIT C3 - U.S. PATENT 9,082,239
Infringement Claim Chart

U.S. Patent 9,082,239	Ford Infringing Activities ¹
	https://media.ford.com/content/fordmedia/fna/us/en/news/2019/10/30/ford-sync-4-brings-new-levels-of-connectivity.html https://www.ford.com/support/how-tos/sync/sync-4a/what-personal-data-does-sync-4a-collect-to-customize-suggestions/ https://www.fordservicecontent.com/Ford_Content/vdirtsnet/OwnerManual/Home/Content?variantid=9193&languageCode=en&countryCode=USA&UId=G2322007&ProcUId=G2322008&userMarket=G2322008&div=f&vFilteringEnabled=False&buildtype=web
1B determining, by a microprocessor executable vehicle control system, vehicle-related information, wherein vehicle related information comprises one or more of vehicle context, state, external surroundings, location, past, current, and/or intended path of travel, waypoint, and destination; and	The microprocessor executable vehicle control system of the '239 C3 Accused Instrumentalities determines vehicle-related information, wherein vehicle related information comprises vehicle state, location, past, current, and/or intended path of travel, destination, and external surroundings (e.g., traffic). For example, such information is determined in connection with navigation guidance. <u>Exemplary Sources</u> https://www.ford.com/technology/connected-navigation/ https://www.ford.com/help/privacy/#connectedvehicleprivacynotice
1C based on the persona of the selected vehicle occupant and the vehicle-related information, determining, by the microprocessor executable vehicle control system, a type of assistance to provide the selected vehicle occupant, the type of assistance not being based on or in response to a preceding request of the selected vehicle occupant;	The microprocessor executable vehicle control system of the '239 C3 Accused Instrumentalities determines, based on the occupant's persona and the vehicle-related information, a type of assistance to provide the vehicle occupant, the type of assistance not being based on or in response to a preceding request of the selected vehicle occupant. For example, the vehicle control system provides Intelligent Suggestions to the occupant, such as suggestions to call a contact or to navigate to a particular destination based on persona information, such as the occupant's habits and schedule. In determining the type of assistance to provide, the vehicle control system utilizes vehicle-related information, such as its current location or intended destination, and the persona it maintains for the selected vehicle occupant, such as information about frequent contacts and/or frequently visited locations. The assistance is not based on a specific request made by the vehicle occupant at the time the assistance is offered.

EXHIBIT C3 - U.S. PATENT 9,082,239
Infringement Claim Chart

U.S. Patent 9,082,239	Ford Infringing Activities ¹
	<i>See also</i> Rows 1A and 1B. <u>Exemplary Sources</u> https://media.ford.com/content/fordmedia/fna/us/en/news/2019/10/30/ford-sync-4-brings-new-levels-of-connectivity.html https://www.youtube.com/watch?v=zl-UzeVfqY
1D performing, by the microprocessor executable vehicle control system, an action assisting the selected vehicle occupant, the action being one or more of providing a suggestion or recommendation to the selected vehicle occupant, adding an entry into the selected vehicle occupant's electronic calendar, providing a notification to the selected vehicle occupant regarding an incoming message, call or action of a person, and/or sending a message to a person at a waypoint or destination of the vehicle regarding an arrival time of the vehicle. For example, the vehicle control system may provide suggestions and recommendations of destinations to the selected vehicle occupant, suggestions and recommendations to call a contact to the selected vehicle occupant, and/or a notification to the selected vehicle occupant regarding an incoming message, call or action of a person. <i>See also</i> Row 1C.	The microprocessor executable vehicle control system of the '239 C3 Accused Instrumentalities performs an action assisting the selected vehicle occupant, the action being one or more of providing a suggestion or recommendation to the selected vehicle occupant, providing a reminder to the selected vehicle occupant, scheduling an activity involving the selected vehicle occupant, purchasing an item on line for the selected vehicle occupant, adding an entry into the selected vehicle occupant's electronic calendar, providing a notification to the selected vehicle occupant regarding an incoming message, call or action of a person, and/or sending a message to a person at a waypoint or destination of the vehicle regarding an arrival time of the vehicle. For example, the vehicle control system may provide suggestions and recommendations of destinations to the selected vehicle occupant, suggestions and recommendations to call a contact to the selected vehicle occupant, and/or a notification to the selected vehicle occupant regarding an incoming message, call or action of a person. <i>See also</i> Row 1C.

EXHIBIT C3 - U.S. PATENT 9,082,239
Infringement Claim Chart

U.S. Patent 9,082,239		Ford Infringing Activities¹
Row	Claim 8	Ford Vehicles Equipped with Intelligent Suggestions
8A	A vehicle, comprising: a microprocessor executable profile identification module operable to maintain a persona of a selected vehicle occupant, wherein the persona comprises one or more of bioinformatics, medical information, driving history, personal information, private information, travel information, and Internet browsing history and/or browsed content.	The '239 C3 Accused Instrumentalities include a vehicle comprising a microprocessor executable profile identification module operable to maintain a persona of a selected vehicle occupant, wherein the persona comprises one or more of bioinformatics, medical information, driving history, personal information, private information, travel information, and Internet browsing history and/or browsed content. See Claim 1, Row 1A.
8B	a microprocessor executable vehicle control system operable to: determine vehicle-related information, wherein vehicle related information comprises one or more of vehicle context, state, external surroundings, location, past, current, and/or intended path of travel, waypoint, and destination;	The microprocessor executable vehicle control system of the '239 C3 Accused Instrumentalities is operable to determine vehicle-related information, wherein vehicle related information comprises one or more of vehicle context, state, external surroundings, location, past, current, and/or intended path of travel, waypoint, and destination. See Claim 1, Row 1B.
8C	based on the persona of the selected vehicle occupant and the vehicle-related information,	The microprocessor executable vehicle control system of the '239 C3 Accused Instrumentalities, based on the persona of the selected vehicle occupant and the vehicle-related information, determines

EXHIBIT C3 - U.S. PATENT 9,082,239
Infringement Claim Chart

U.S. Patent 9,082,239	Ford Infringing Activities ¹
	a type of assistance to provide the selected vehicle occupant, the type of assistance not being based on or in response to a preceding request of the selected vehicle occupant. See Claim 1, Row 1C.
8D perform an action assisting the selected vehicle occupant, the action being one or more of providing a suggestion or recommendation to the selected vehicle occupant, providing a reminder to the selected vehicle occupant, scheduling an activity involving the selected vehicle occupant, adding an entry into the selected vehicle occupant's electronic calendar, providing a notification to the selected vehicle occupant regarding an incoming message, call or action of a person, and/or sending a message to a person at a waypoint or destination of the vehicle regarding an arrival time of the vehicle.	The microprocessor executable vehicle control system of the '239 C3 Accused Instrumentalities performs an action assisting the selected vehicle occupant, the action being one or more of providing a suggestion or recommendation to the selected vehicle occupant, providing a reminder to the selected vehicle occupant, scheduling an activity involving the selected vehicle occupant, purchasing an item on line for the selected vehicle occupant, adding an entry into the selected vehicle occupant's electronic calendar, providing a notification to the selected vehicle occupant regarding an incoming message, call or action of a person, and/or sending a message to a person at a waypoint or destination of the vehicle regarding an arrival time of the vehicle. See Claim 1, Row 1D.
Row	Ford Vehicles Equipped with Intelligent Suggestions
	Claim 15

EXHIBIT C3 - U.S. PATENT 9,082,239
Infringement Claim Chart

U.S. Patent 9,082,239	Ford Infringing Activities ¹
15A A tangible and non-transient computer readable medium comprising microprocessor executable instructions that, when executed, perform functions comprising: maintaining a persona of a selected vehicle occupant, wherein the persona comprises one or more of bioinformatics, medical information, driving history, personal information, travel information, and Internet browsing history and/or browsed content;	The '239 C3 Accused Instrumentalities include a tangible and non-transient computer readable medium comprising microprocessor executable instructions that, when executed, perform functions comprising maintaining a persona of a selected vehicle occupant, wherein the persona comprises one or more of bioinformatics, medical information, driving history, personal information, private information, travel information, and Internet browsing history and/or browsed content. <i>See Claim 1, Row 1A.</i>
15B determining vehicle-related information, wherein vehicle related information comprises one or more of vehicle context, state, external surroundings, location, past, current, and/or intended path of travel, waypoint, and destination;	The microprocessor executable instructions of the '239 C3 Accused Instrumentalities, when executed, determine vehicle-related information, wherein vehicle related information comprises one or more of vehicle context, state, external surroundings, location, past, current, and/or intended path of travel, waypoint, and destination. <i>See Claim 1, Row 1B.</i>
15C based on the persona of the selected vehicle occupant and the vehicle-related information, determining a type of assistance to provide the selected vehicle	The microprocessor executable instructions of the '239 C3 Accused Instrumentalities, when executed, determine, based on the persona of the selected vehicle occupant and the vehicle-related information, a type of assistance to provide the selected vehicle occupant, the type of assistance not being based on or in response to a preceding request of the selected vehicle occupant.

EXHIBIT C3 - U.S. PATENT 9,082,239
Infringement Claim Chart

U.S. Patent 9,082,239	Ford Infringing Activities ¹
occupant, the type of assistance not being based on or in response to a preceding request of the selected vehicle occupant; and	See Claim 1, Row 1C.
15D performing an action assisting the vehicle occupant, the action being one or more of providing a suggestion or recommendation to the selected vehicle occupant, providing a reminder to the selected vehicle occupant, scheduling an activity involving the selected vehicle occupant, purchasing an item on line for the selected vehicle occupant, adding an entry into the selected vehicle occupant's electronic calendar, providing a notification to the selected vehicle occupant regarding an incoming message, and/or sending a message to a person at a waypoint or destination of the vehicle.	The microprocessor executable instructions of the '239 C3 Accused Instrumentalities, when executed, perform an action assisting the vehicle occupant, the action being one or more of providing a suggestion or recommendation to the selected vehicle occupant, providing a reminder to the selected vehicle occupant, scheduling an activity involving the selected vehicle occupant, purchasing an item on line for the selected vehicle occupant, adding an entry into the selected vehicle occupant's electronic calendar, providing a notification to the selected vehicle occupant regarding an incoming message, call or action of a person, and/or sending a message to a person at a waypoint or destination of the vehicle regarding an arrival time of the vehicle. See Claim 1, Row 1D.