

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

SITEPRO, INC.,

Plaintiff,

v.

TANKLOGIX, LLC,

Defendant.

C.A. No. MO:25-CV-00266-DC-DTG

JURY TRIAL DEMANDED

PLAINTIFF SITEPRO, INC.'S PRELIMINARY INFRINGEMENT CONTENTIONS

Pursuant to this Court's Order Governing Proceedings in Patent Cases and the parties' Proposed Case Management Plan (ECF No. 17-1), Plaintiff SitePro, Inc. ("SitePro" or "Plaintiff") hereby makes the following preliminary infringement contentions with respect to U.S. Patent No. 12,321,184 (the "'184 Patent" or the "Asserted Patent") on Defendant TankLogix, LLC ("TankLogix" or "Defendant").

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

Defendant infringes claims 1-31 of the Asserted Patent.

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 Patent, 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 Patent, 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 patent 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 Exhibit A. Based on Plaintiff’s good

faith belief, the citations in the claim charts are representative of the Accused System. Where Plaintiff cites to sections representing a certain version or aspect of the Accused System, that citation is representative of all other versions or aspects including all prior and future versions unless otherwise noted. Plaintiff reserves the right to amend these claim charts, as well as other information contained in this document and exhibits hereto, to incorporate new information learned during the course of discovery.

C. Priority Date of Each Asserted Claim

Each of the asserted claims of the Asserted Patent are entitled to a priority date at least as early as February 2012.

D. Documents Evidencing Conception and Reduction to Practice and File History for the Asserted Patent

Currently available, non-privileged documents that relate to the conception and/or reduction to practice of the Asserted Patent, including the file history of the Asserted Patent are being produced at SITEPRO-TL-266_000001- SITEPRO-TL-266_000948. 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: August 25, 2025

Respectfully submitted,

/s/ M. Craig Tyler

M. Craig Tyler

Texas State Bar No. 00794762

CTyler@perkinscoie.com

Andrew Kalamarides

Texas State Bar No. 24136939

AKalamarides@perkinscoie.com

Helena E.D. Burns

Texas State Bar No. 24143961

HBurns@perkinscoie.com

PERKINS COIE LLP

405 Colorado Street, Suite 1700

Austin, Texas 78701

Tel: (737) 256-6100

Attorneys for Plaintiff

SitePro, Inc.

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 25th day of August, 2025, upon the Defendant's counsel of record.

/s/ M. Craig Tyler
M. Craig Tyler

Exhibit A

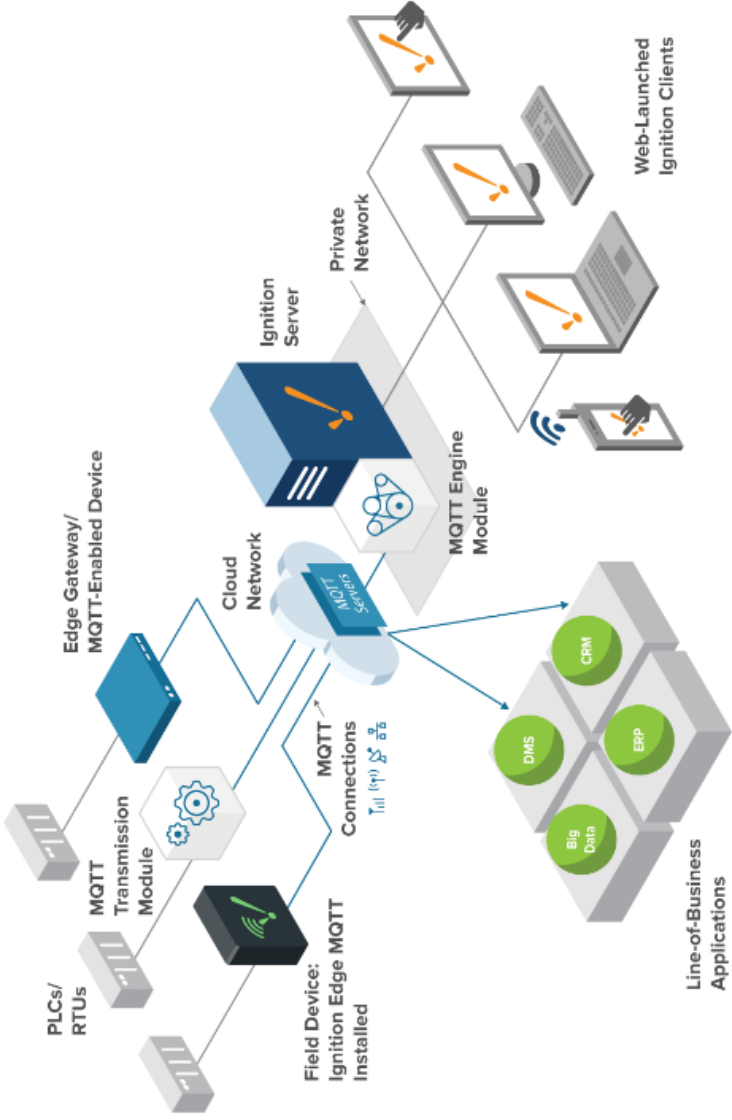
Infringement Analysis of U.S. Patent No. 12,321,184 Against the TankLogix Ignition-Hosted Automation System Implemented by TankLogix

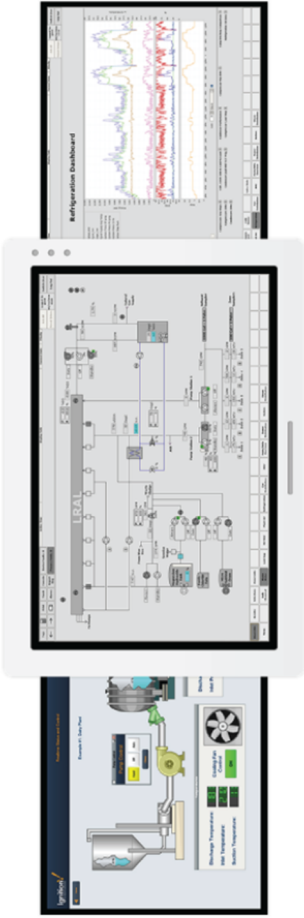
Pursuant to this Court's Order Governing Proceedings in Patent Cases this chart sets forth where in the Accused System(s) each element of claims 1-31 of U.S. Patent No. 12,321,184 (the "184 Patent") is found. The Accused System is the TankLogix Ignition-Hosted Automation System ("the Accused System") 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://www.tanklogix.com/vfd-controls-and-motors/>.
- Exhibit 4, <https://www.docs.inductiveautomation.com/docs/8.1/getting-started/introducing-ignition>.
- Exhibit 5, <https://tanklogix.com/tank-monitoring/benefits>.
- Exhibit 6, <https://www.tanklogix.com/>.
- Exhibit 7, <https://www.docs.inductiveautomation.com/docs/8.1/system-architectures/iiot-architecture>.
- Exhibit 8, <https://www.docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge/edge-gateway/configuring-sync-services#data-synchronization>.
- Exhibit 9, <https://www.docs.inductiveautomation.com/docs/8.1/ignition-modules/perspective/working-with-perspective-components/component-events-and-actions>.
- Exhibit 10, <https://www.docs.inductiveautomation.com/docs/8.1/other-editions/ignition-edge>.
- Exhibit 11, <https://www.docs.inductiveautomation.com/docs/8.1/appendix/scripting-functions/system-security/system-security-validateUser>.
- Exhibit 12, <https://tanklogix.com/salt-water-disposal>.
- Exhibit 13, <https://tanklogix.com/tank-monitoring/regulation-prevention>.
- Exhibit 14, <https://inductiveautomation.com/ignition/modules/perspective>.
- Exhibit 15, <https://www.docs.inductiveautomation.com/docs/8.1/platform/scripting>.
- Exhibit 16, <https://www.docs.inductiveautomation.com/docs/8.1/ignition-modules/vision/scripting-in-vision/script-builders-in-vision>.

U.S. Patent No. 12,321,184	The Accused System
Claim 1	
[1.1] A tangible, non-transitory, machine-readable medium storing instructions that, when executed by one or more processors, effectuate operations comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a tangible, non-transitory, machine-readable medium storing instructions that, when executed by one or more processors, effectuate operations. <i>See, e.g.:</i> Comprehensive Hosted SCADA TankLogix Hosted SCADA (Supervisory Control and Data Acquisition) is powered by Inductive Automation's Ignition platform. Easily connect v collect data from, and control your field devices over our secure network. Your data is safely hosted on our cloud-based infrastructure, providing reliability and integrity. Intuitive design and robust features in our desktop and mobile software provide powerful insights and monitoring of your and operations. Reduce IT resource strain by having us handle the software development, network, IT infrastructure, and maintenance so you can 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 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.
[1.2] receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices. <i>See, e.g.:</i>	The Accused System comprises receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices. <i>See, e.g.:</i>

U.S. Patent No. 12,321,184	The Accused System
devices among the plurality of fluid-handling devices, wherein:	IIoT Architecture  The diagram illustrates an IIoT Architecture. On the left, 'PLCs/RTUs' are connected to an 'MQTT Transmission Module' (gear icon). This module connects to an 'Edge Gateway/MQTT-Enabled Device' (blue box). The gateway connects to a 'Cloud Network' (cloud icon). Within the cloud network is an 'MQTT Server'. A 'Field Device: Ignition Edge MQTT Installed' (black box with antenna) also connects to the 'MQTT Server'. The 'MQTT Server' has 'MQTT Connections' (labeled with a plus sign and minus sign) to an 'MQTT Engine Module' (cylinder icon). The 'MQTT Engine Module' connects to an 'Ignition Server' (blue box). The 'Ignition Server' connects to a 'Private Network' (cloud icon). Finally, the 'Private Network' connects to 'Web-Launched Ignition Clients' (laptop and tablet icons). Below the cloud network, 'Line-of-Business Applications' are shown as a stack of four green circles labeled 'Big Data', 'ERP', 'CRM', and 'DMS'. Exhibit 2. The PLC necessarily has a network interface to communicate both to the remote command-center server and to the various networked devices local to the site.

U.S. Patent No. 12,321,184	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 4.

Ignition User Manual

Docs

SDK Guide

8.3 News

Resources

Partner Links

8.1

Download Ignition

Search

Welcome

Getting Started

System Architectures

Basic Architecture

Scale Out Architecture

Hub and Spoke Architecture

Edge Architectures

IIoT Architecture

Enterprise Architecture

Redundancy Architecture

Cloud Based Architecture

AWS Outposts Architecture

Security Architecture

Overview

IIoT Architecture Example

IIoT Architecture Objects

Field Device

MQTT Server (Broker)

Subscriber

IIoT Architecture Objects

The following are key pieces in the IIoT Architecture.

Field Device

A Field Device of some sort can be used to connect to a PLC. This device also needs to be able to publish Tag values to an MQTT server. Any of the following hardware can act as a Field Device:

- Ignition Edge with the MQTT product
- Ignition server with the MQTT Transmitter Module
- Third-party MQTT enabled device

Exhibit 2.

TANKLOGIX

Home

Our Services

About

Careers

Support

System Status

Blog

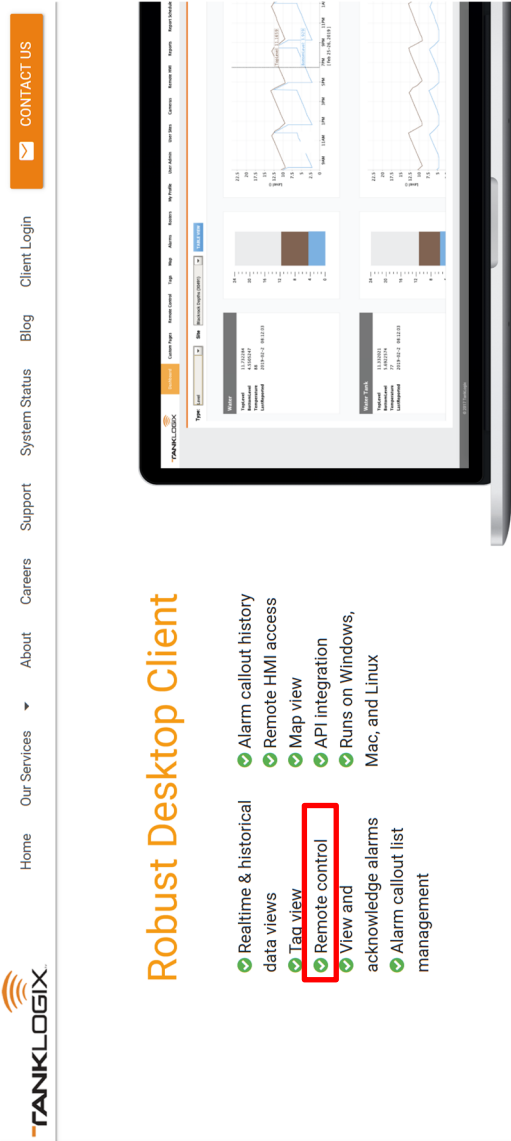
Client Login

CONTACT US



Oilfield Automation, SCADA, Tank Monitoring, and More

Exhibit 6.

U.S. Patent No. 12,321,184	The Accused System
	 Exhibit 1 (annotated). The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro’s current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[1.3] the plurality of commands are responsive to inputs to a command interface presented on a remote user computing device, and	The Accused System comprises the plurality of commands are responsive to inputs to a command interface presented on a remote user computing device. <i>See, e.g.:</i>

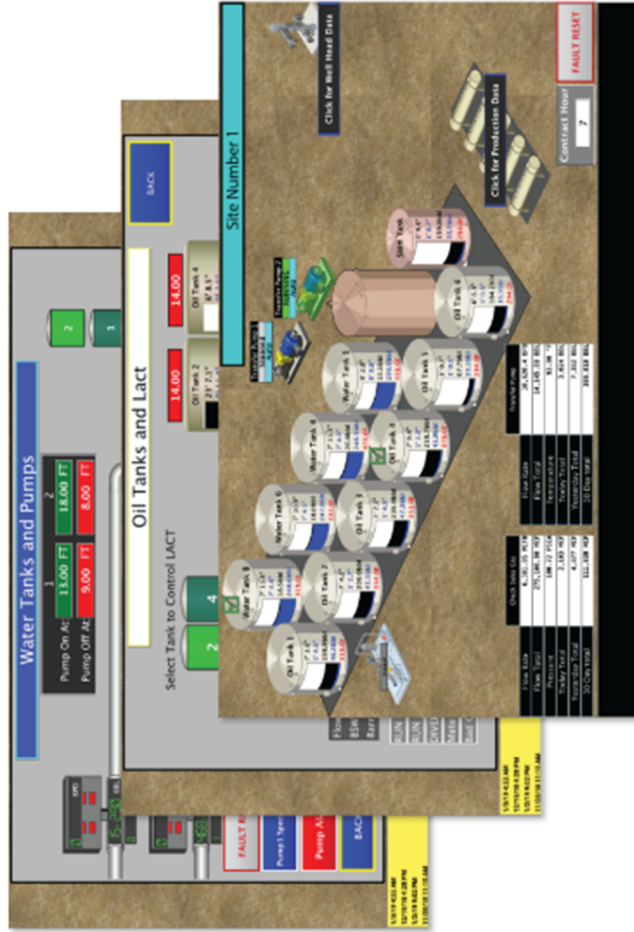
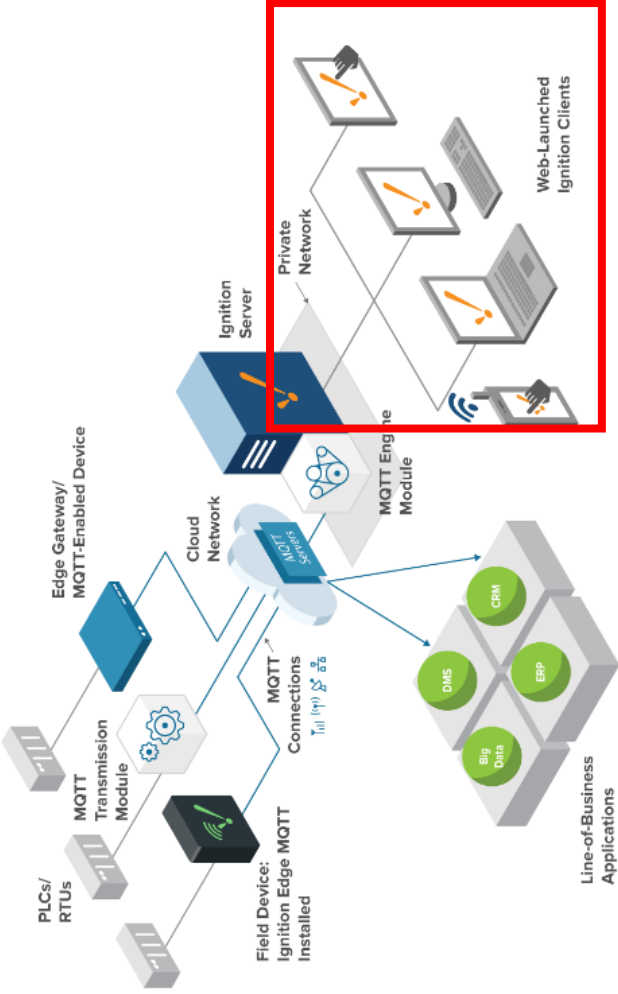


Exhibit 1.

U.S. Patent No. 12,321,184	The Accused System
	IIoT Architecture  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.
[1.4] the plurality of commands are received after determining that a user	The Accused System comprises the plurality of commands are received after determining that a user of the remote user computing device is authorized to issue

U.S. Patent No. 12,321,184	The Accused System
of the remote user computing device is authorized to issue commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user account being accessed from a data store;	commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user account being accessed from a data store. <i>See, e.g.:</i>  The screenshot shows the TankLogix website. At the top is a navigation bar with links: Home, Our Services (with a dropdown arrow), About, Careers, Support, System Status, Blog, and Client Login. A 'CONTACT US' button with an envelope icon is on the right. Below the navigation bar is a large banner image of an industrial crane against a blue sky with a bright sun. Overlaid on the left side of the banner is the text 'Hosted Ignition' in orange. Below the banner, the heading 'Comprehensive Hosted SCADA' is displayed in large black font. Underneath this heading is a paragraph of text: '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. On information and belief, the Accused System provides access to TankLogix customer organizations to monitor fluid handling sites.

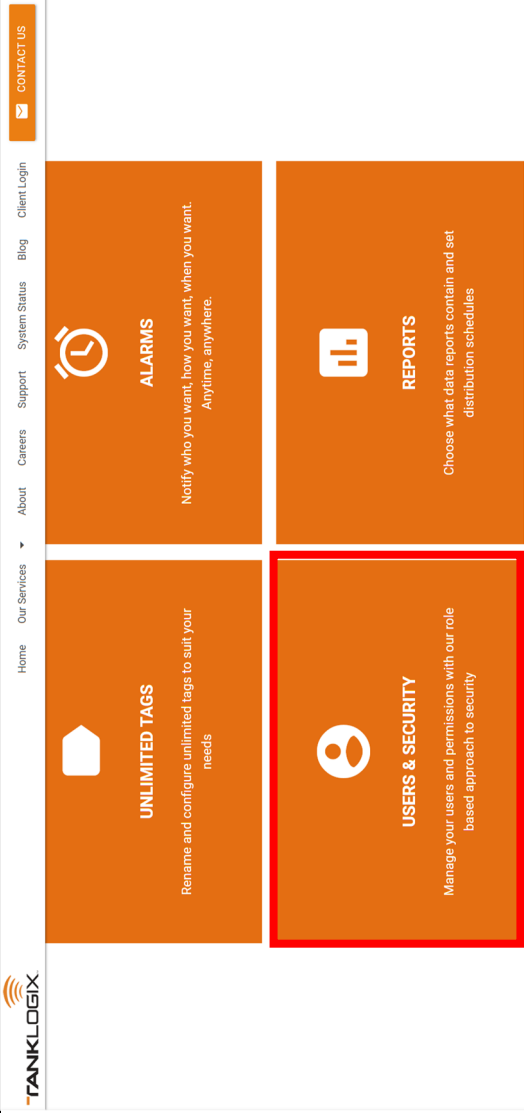


Exhibit 1.



[Home](#) [Our Services](#) [About](#) [Careers](#) [Support](#) [System Status](#) [Blog](#) [Client Login](#) [CONTACT](#)

Benefits



Reduced IT Cost
Managed servers and networks reduce strain on your IT resources



Secure and Reliable
Our reliable cloud servers and robust VPN provide you with peace of mind



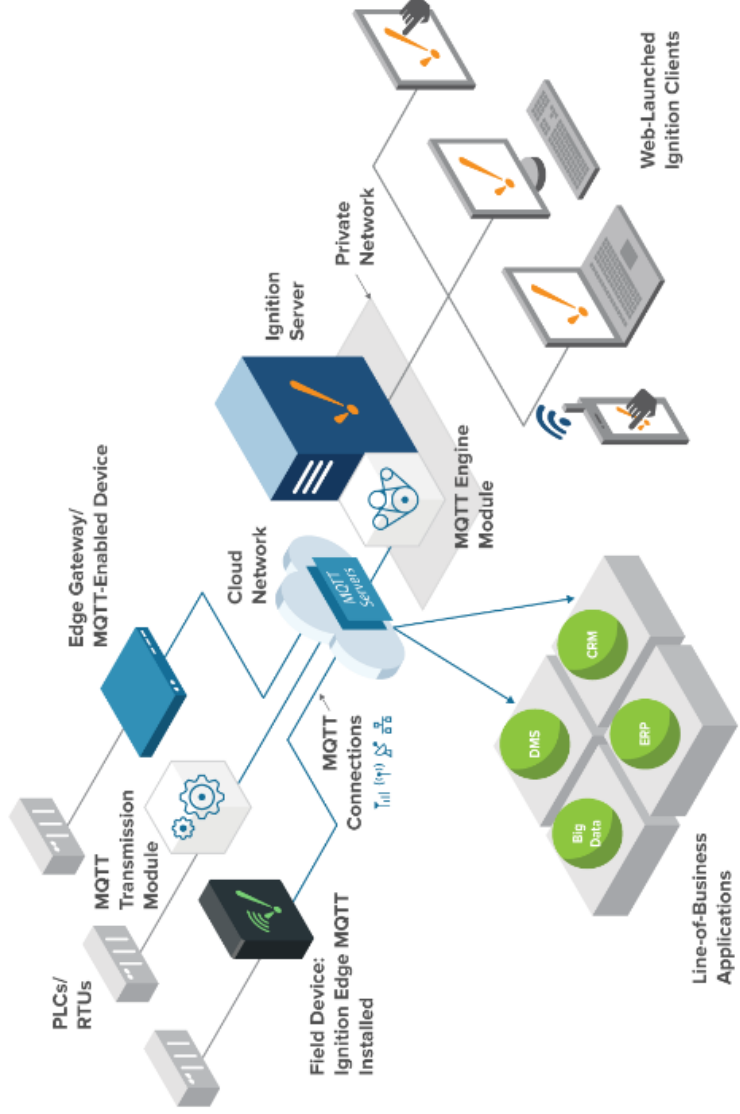
Highly Customizable
Custom pages and reports provide you with your data, exactly how you want it



Unlimited Clients
Unlimited clients on PC, Mac, Linux, and our optimized mobile experience keep you connected

Exhibit 1.

U.S. Patent No. 12,321,184	 Exhibit 1 (annotated). On information and belief, the Accused System stores user account information in a data store and accesses it from the data store in order to provide access to user site and device information on the Accused System. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available. The Accused System comprises for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a
[1.5] for at least some of the plurality of commands, determining, with the first	

U.S. Patent No. 12,321,184	The Accused System
computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection;	given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection. <i>See, e.g.:</i> IIoT Architecture  The diagram illustrates an IIoT (Industrial Internet of Things) architecture. On the left, 'PLCs/RTUs' (Programmable Logic Controllers/Remote Terminal Units) are connected to an 'MQTT Transmission Module' (represented by a gear icon). This module connects to an 'Edge Gateway/MQTT-Enabled Device' (a blue server rack icon). The gateway connects to a 'Cloud Network' (a cloud icon). Within the cloud network is an 'MQTT Server' (a blue server rack icon). A 'Field Device: Ignition Edge MQTT Installed' (a black device with a green antenna) also connects to the MQTT Server. The MQTT Server is connected to an 'MQTT Engine Module' (a blue server rack icon). This module connects to an 'Ignition Server' (a blue server rack icon). The Ignition Server is connected to a 'Private Network' (a cloud icon). Finally, the Private Network connects to 'Web-Launched Ignition Clients' (represented by laptop and tablet icons). On the right side of the diagram, a 'Line-of-Business Applications' block contains four green circles labeled 'Big Data', 'DMS', 'CRM', and 'ERP'. Arrows indicate data flow from the MQTT Server to these applications. Exhibit 2. The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time.

U.S. Patent No. 12,321,184	The Accused System
	For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags: “What Is Scripting? Most of the time when we talk about "scripting" in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with **"system"** and press `ctrl+space` to see a list of available functions. The list will filter itself as you continue typing.

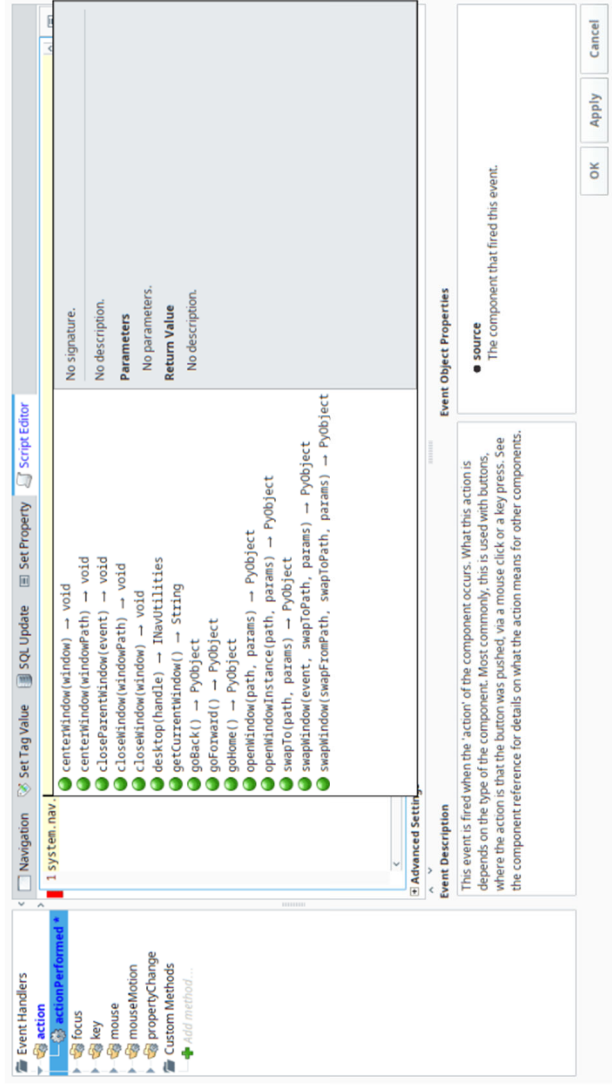


Exhibit 15.

“Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways.

Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema.

U.S. Patent No. 12,321,184	The Accused System
	Tags - Create a script that runs on a Tag change and when an alarm goes active!" Exhibit 15. "Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short." Exhibit 15. "When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example." Exhibit 16. "Script Editor The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler.

U.S. Patent No. 12,321,184	The Accused System
	As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. 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] translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states. See, e.g.: The local controller is, for example, a variable-frequency drive (VFD). For example, the facility includes a fluid-handling device (e.g., pump with an actuator) and a motor powered by a VFD:	The Accused System comprises translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states. <i>See, e.g.:</i> The local controller is, for example, a variable-frequency drive (VFD). For example, the facility includes a fluid-handling device (e.g., pump with an actuator) and a motor powered by a VFD:

popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with “**system**” and press `ctrl+space` to see a list of available functions. The list will filter itself as you continue typing.

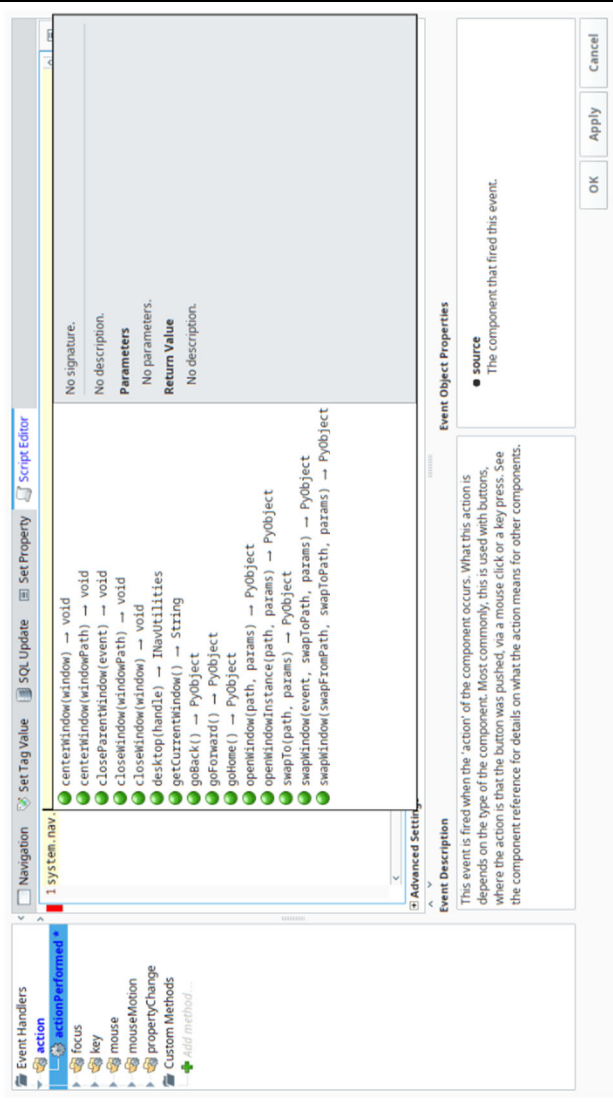


Exhibit 15.

U.S. Patent No. 12,321,184	The Accused System
	“Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways. Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema. Tags - Create a script that runs on a Tag change and when an alarm goes active!” Exhibit 15. “Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short.” Exhibit 15. “When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example.” Exhibit 16. “Script Editor The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update

U.S. Patent No. 12,321,184	The Accused System
	the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler. As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. 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] sending, with the first computing system, the translated commands to the local controllers;	The Accused System comprises sending, with the first computing system, the translated commands to the local controllers. <i>See, e.g.:</i>

IIoT Architecture

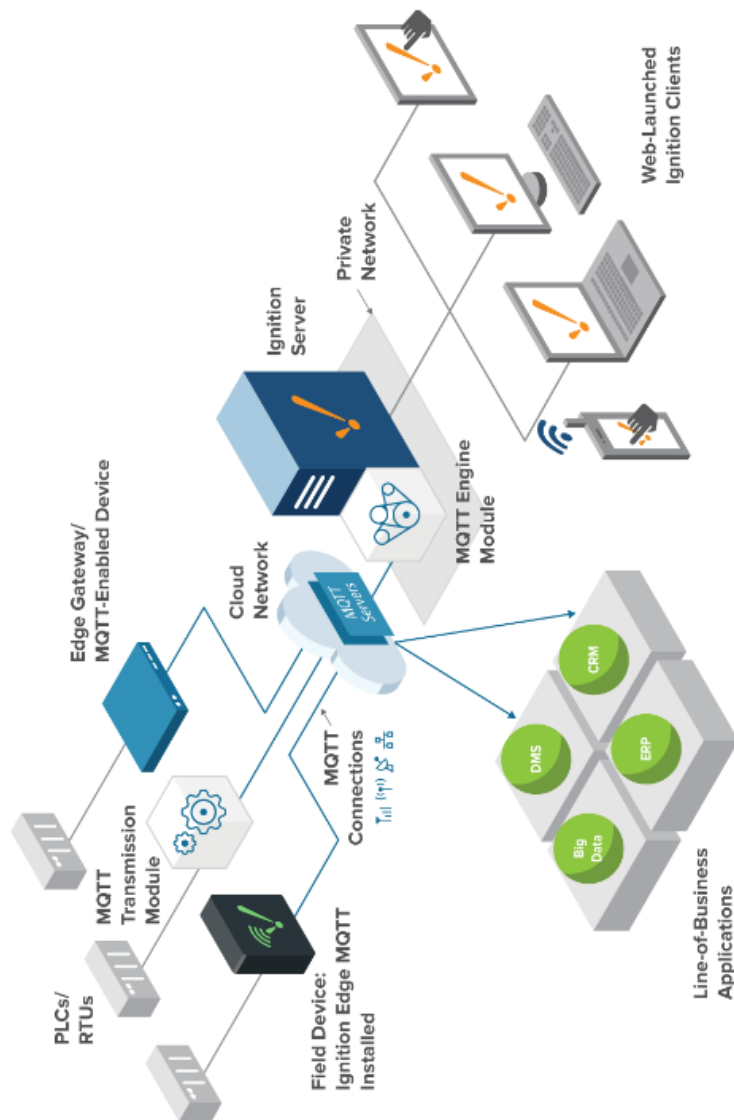


Exhibit 2. For example, on information and belief, the PLCs receive commands in a protocol such as TCP/IP, received via, for example, a TCP/IP connection, and then send the commands to the fluid-handling devices to which the respective commands are directed via the appropriate protocol.

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

U.S. Patent No. 12,321,184	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.
[1.8] obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices;	The Accused System comprises obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices. <i>See, e.g.:</i>

IIoT Architecture

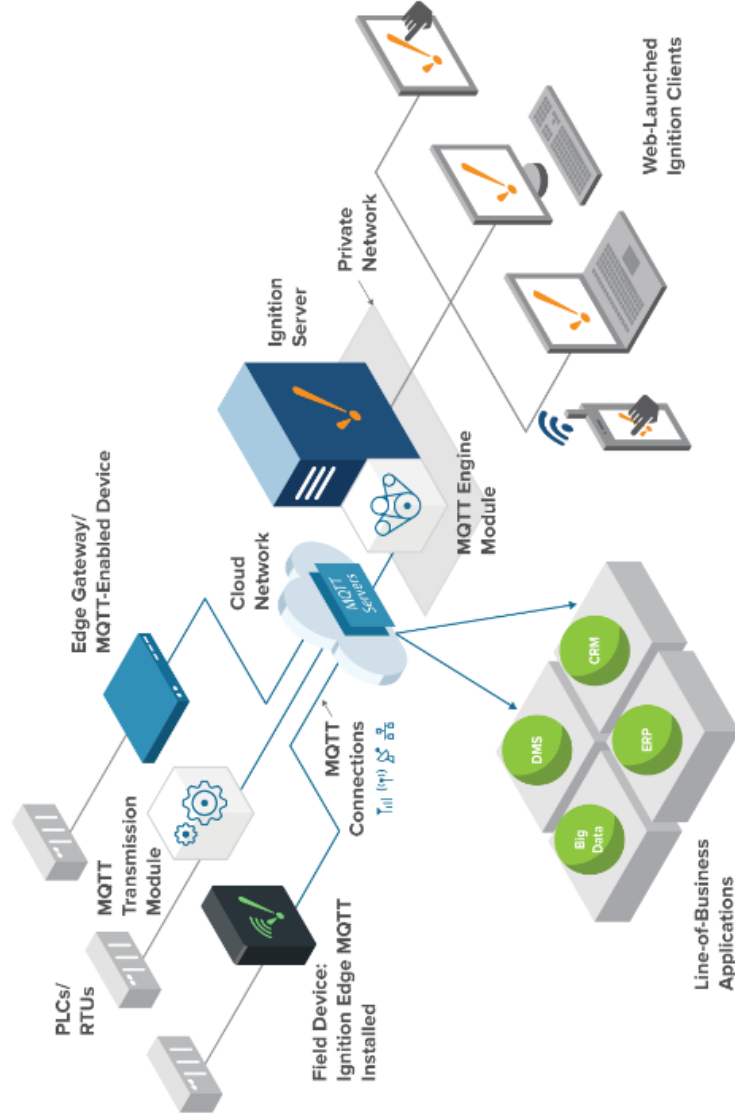
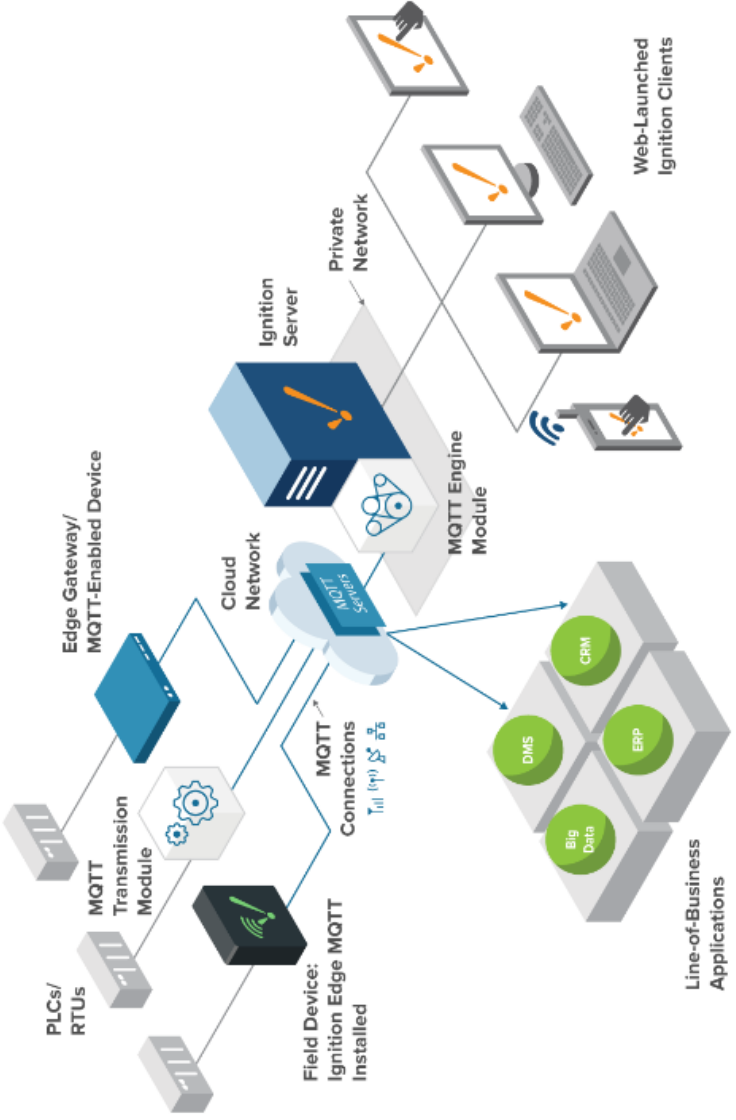


Exhibit 2. The PLCs and/or Ignition Edge modules at each facility buffer data collected from devices at each site, and the facility-interface module is configured to pull buffered data stored at the facilities.

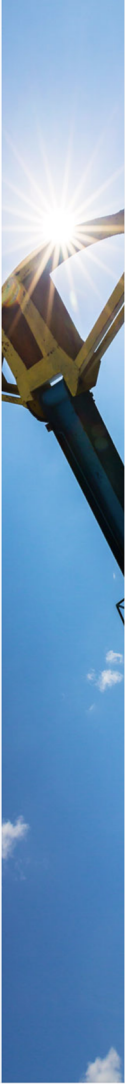
The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's

U.S. Patent No. 12,321,184	The Accused System
[1.9] sending, with the first computing system, the site data stored in the report buffer to a remote second computing 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. The Accused System comprises sending, with the first computing system, the site data stored in the report buffer to a remote second computing system. <i>See, e.g.:</i> IIoT Architecture  The diagram illustrates an IIoT (Industrial Internet of Things) architecture. On the left, 'PLCs/RTUs' (Programmable Logic Controllers/Remote Terminal Units) are connected to an 'MQTT Transmission Module' (represented by a gear icon). This module connects to an 'Edge Gateway/MQTT-Enabled Device' (a blue box). The edge gateway connects to a 'Cloud Network' (a cloud icon). Within the cloud network, there are 'MQTT Servers' (blue boxes). These servers connect to an 'MQTT Engine Module' (a blue box with a gear icon). The engine module connects to an 'Ignition Server' (a blue box with a gear icon). The ignition server connects to a 'Private Network' (a blue box). Finally, the private network connects to 'Web-Launched Ignition Clients' (represented by laptop and tablet icons). On the right side of the diagram, 'Line-of-Business Applications' are shown, including 'Big Data', 'DMS' (Document Management System), 'ERP' (Enterprise Resource Planning), and 'CRM' (Customer Relationship Management). Arrows indicate the flow of data from the PLCs/RTUs through the edge gateway, cloud network, and various servers to the business applications.

U.S. Patent No. 12,321,184	The Accused System
	Exhibit 2. The PLCs and/or Ignition Edge modules at each facility buffer data collected from devices at each site and are configured to send buffered data to the Ignition Server or Gateway. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 2 [2.1] The medium of claim 1, wherein: other user accounts in the data store indicate other users are not authorized to issue commands to the first computing system; and	The Accused System comprises the medium of claim 1, wherein: other user accounts in the data store indicate other users are not authorized to issue commands to the first computing system. <i>See, e.g.:</i> <i>See claim 1 above.</i>



[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.



[Home](#)
[Our Services](#)
[About](#)
[Careers](#)
[Support](#)
[System Status](#)
[Blog](#)
[Client Login](#)
[CONTACT US](#)



UNLIMITED TAGS

Rename and configure unlimited tags to suit your needs



ALARMS

Notify who you want, how you want, when you want. Anytime, anywhere.



REPORTS

Choose what data reports contain and set distribution schedules



USERS & SECURITY

Manage your users and permissions with our role based approach to security

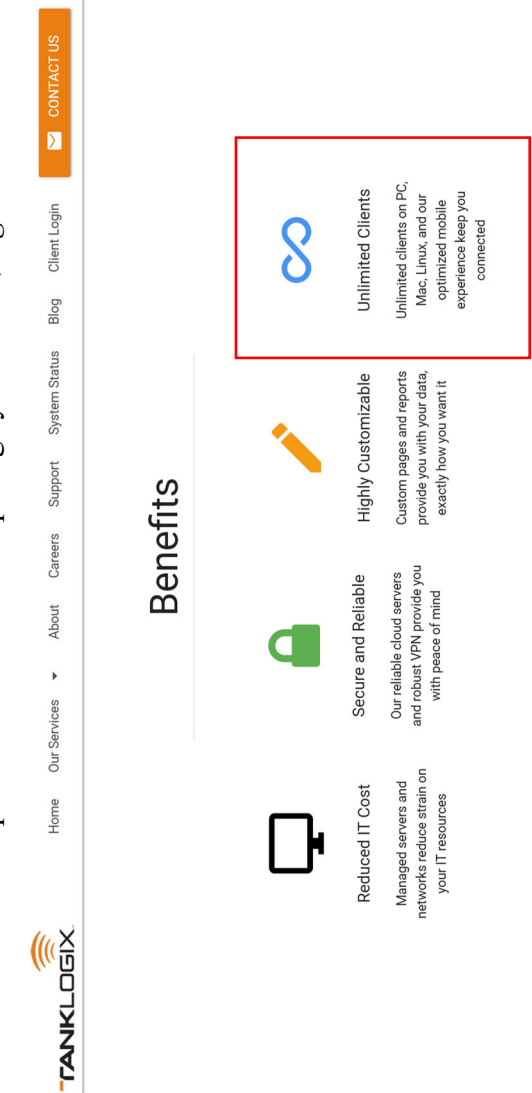
U.S. Patent No. 12,321,184	The Accused System Exhibit 1. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test 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.
[2.2] the other user accounts indicate the other users are authorized to view reports from the first computing system.	The Accused System comprises the other user accounts indicate the other users are authorized to view reports from the first computing system. <i>See, e.g.:</i>  Exhibit 1 (annotated).



Exhibit 1 (annotated).



U.S. Patent No. 12,321,184	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 3 [3] The medium of claim 1, wherein sending is in response to a pull command from the second computing system.	The Accused System comprises the medium of claim 1, wherein sending is in response to a pull command from the second computing system. <i>See, e.g.:</i> <i>See claim 1 above.</i>

IIoT Architecture

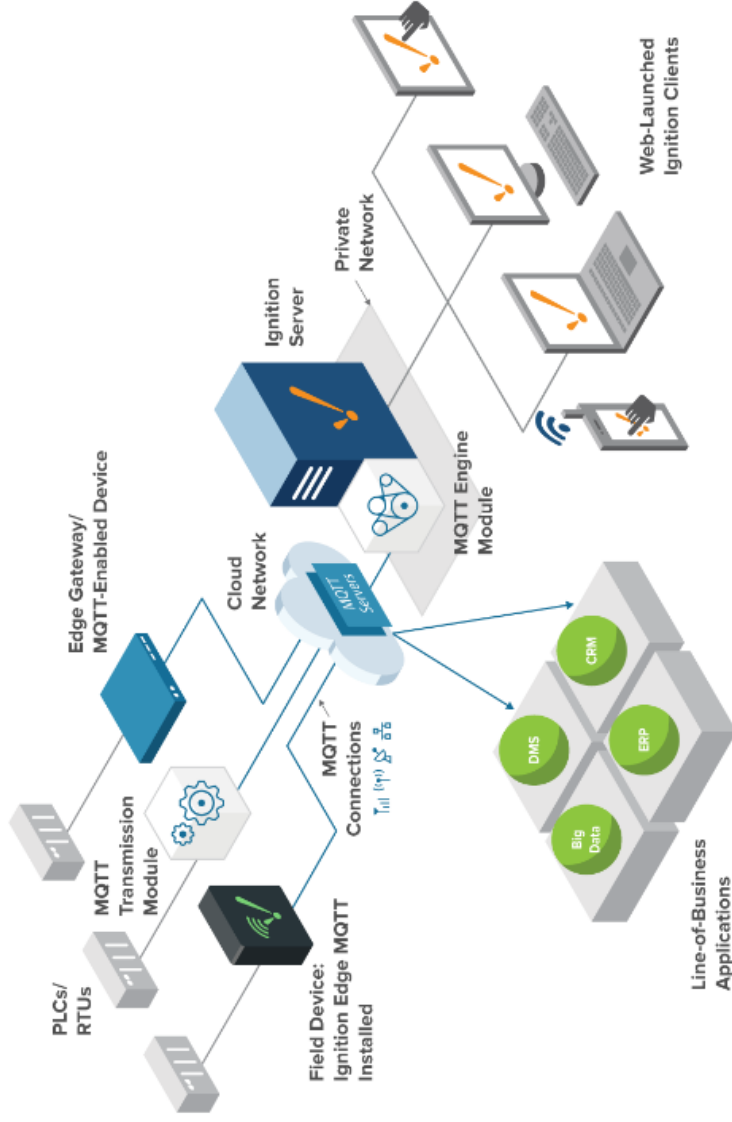


Exhibit 2. The PLCs and/or Ignition Edge modules at each facility buffer data collected from devices at each site, and the Ignition Server and/or Gateway are configured to pull buffered data stored at the facilities.

The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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. 12,321,184	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] The medium of claim 1, wherein sending comprises determining, with the first computing system, to push the site data in the report buffer and, in response, pushing the site data in the report buffer to the second computing system.	The Accused System comprises the medium of claim 1, wherein sending comprises determining, with the first computing system, to push the site data in the report buffer and, in response, pushing the site data in the report buffer to the second computing system. <i>See, e.g.:</i> <i>See claim 1 above.</i> The controller shown by the schematic below is configured to push buffered data to the second computing system (e.g., Ignition Server and/or Gateway).

IIoT Architecture

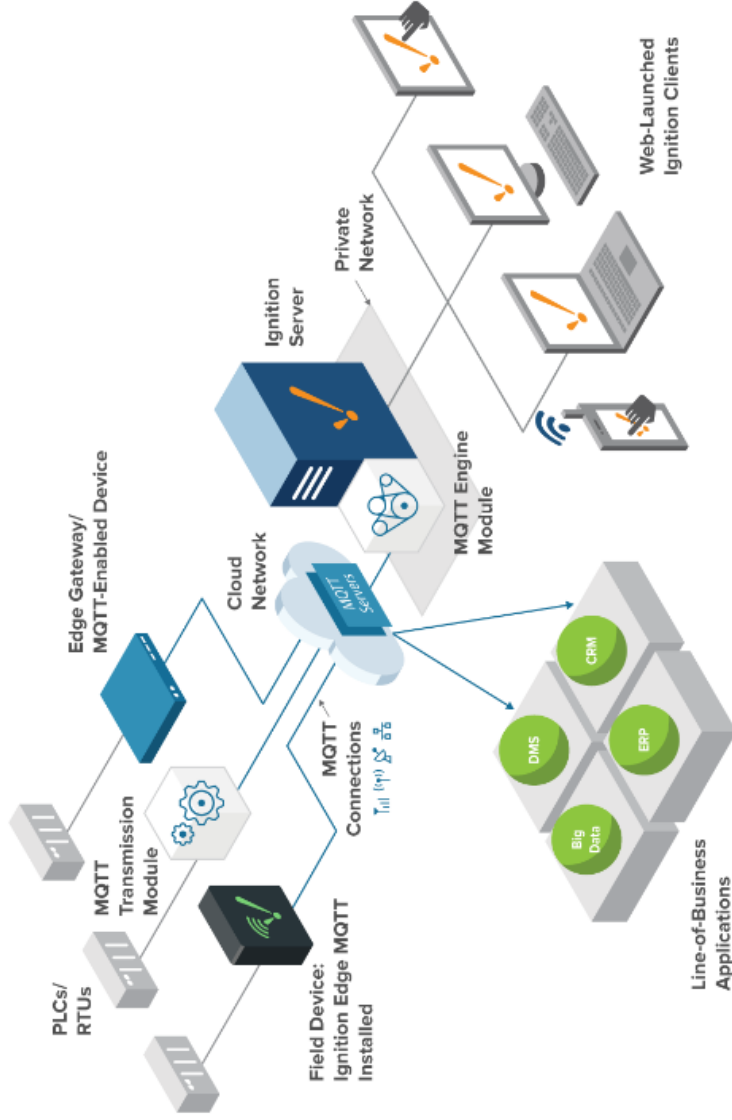


Exhibit 2.

The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro’s current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 12,321,184	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 5	
[5] The medium of claim 1, wherein obtaining the site data comprises: polling, with the first computing system, sensors of the fluid handling site.	The Accused System comprises the medium of claim 1, wherein obtaining the site data comprises: polling, with the first computing system, sensors of the fluid handling site. <i>See, e.g.:</i> <i>See claim 1 above.</i>

IIoT Architecture

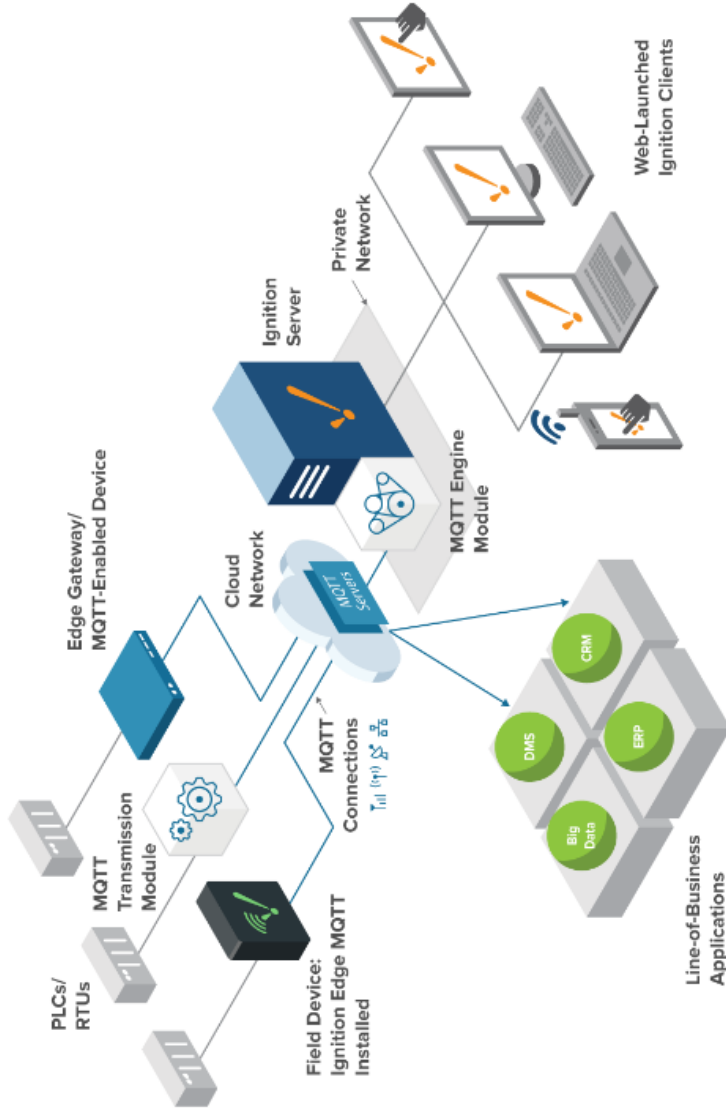
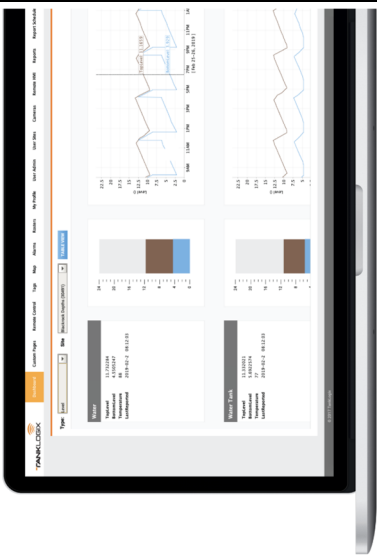


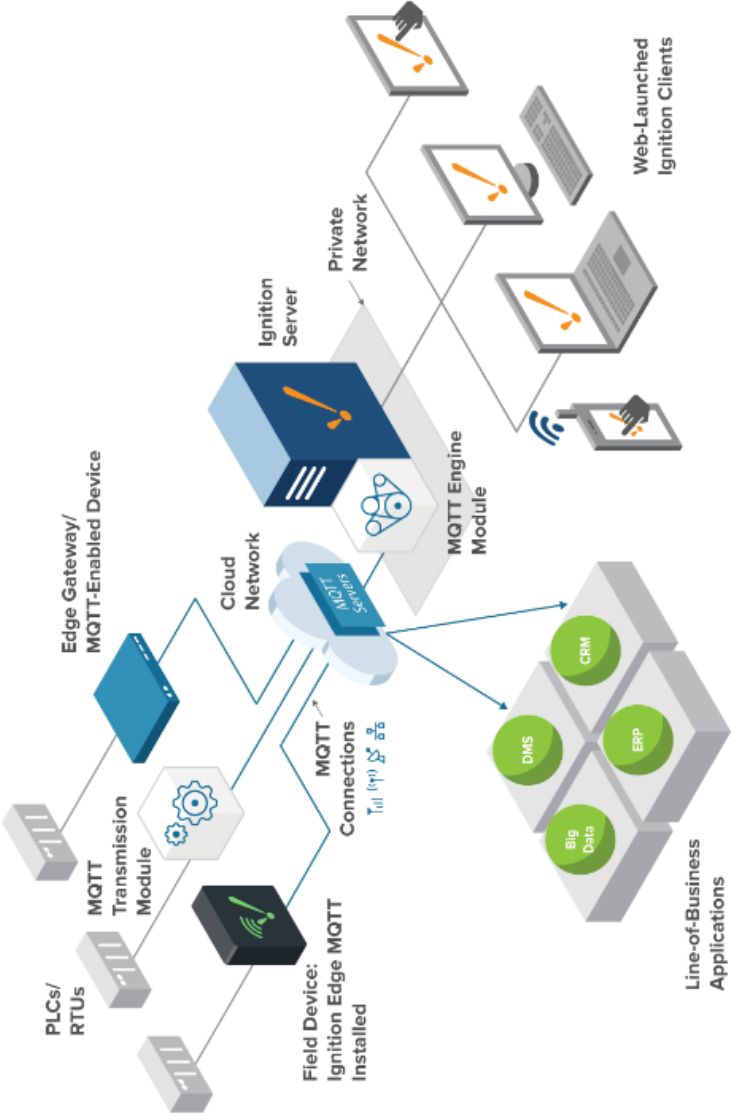
Exhibit 2.

As shown in the example below, the controller (e.g., PLC) polls sensors to obtain data from the fluid-handling device (e.g., Realtime & historical data views):

U.S. Patent No. 12,321,184	 Home Our Services About Careers Support System Status Blog Client Login CONTACT US Robust Desktop Client - Realtime & historical data views - Tag view - Remote control - View and acknowledge alarms - Alarm callout list management - Alarm callout history - Remote HMI access - Map view - API integration - Runs on Windows, Mac, and Linux 
Claim 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. The Accused System comprises the medium of claim 1, wherein obtaining the site data comprises: accessing, with the first computing system, an alarm log from one of the plurality of fluid handling devices via a control bus. <i>See, e.g.:</i>

U.S. Patent No. 12,321,184	The Accused System
plurality of fluid handling devices via a control bus.	See claim 1 above. “Alarm Journal - The alarm journal will store all alarm events locally for one week of events. There are limited configuration options; the Alarm Journal can be accessed via the Edge Alarm Journal profile. The Edge alarm journal and audit log can sync under EAM.” Exhibit 10.  Ignition Edge Sync Services synchronizes data from the edge of the network to a central Ignition server. The plugin allows access to Sync Services, remote Tags and alarm pipelines, Tag history sync, alarm history sync, and audit log sync. Exhibit 10.

U.S. Patent No. 12,321,184	The Accused System
	 UNLIMITED TAGS Rename and configure unlimited tags to suit your needs  ALARMS Notify who you want, how you want, when you want. Anytime, anywhere.  USERS & SECURITY Manage your users and permissions with our role based approach to security  REPORTS Choose what data reports contain and set distribution schedules 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 7	
[7] The medium of claim 1, the operations comprising: after a predetermined period of time has elapsed after sending the site data,	The Accused System comprises the medium of claim 1, the operations comprising: after a predetermined period of time has elapsed after sending the site data, sending newer site data stored in the report buffer to the remote second computing system. See, e.g.:

U.S. Patent No. 12,321,184 sending newer site data stored in the report buffer to the remote second computing system.	The Accused System See claim 1 above. The controller shown by the schematic below is configured to push buffered data to the second computing system (e.g., Ignition Server and/or Gateway). IIoT Architecture  The diagram illustrates an IIoT Architecture. On the left, PLCs/RTUs are connected to an MQTT Transmission Module. This module connects to an Edge Gateway/MQTT-Enabled Device. The Edge Gateway connects to a Cloud Network. The Cloud Network is connected to an Ignition Server and an MQTT Engine Module. The Ignition Server is connected to a Private Network, which in turn connects to Web-Launched Ignition Clients. The MQTT Engine Module is connected to Line-of-Business Applications, which include CRM, ERP, and Big Data. The diagram also shows a Field Device: Ignition Edge MQTT Installed, which connects to the Cloud Network via MQTT Connections. The Cloud Network is also connected to an MQTT Server. 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
---	--

U.S. Patent No. 12,321,184	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 8	The Accused System comprises the medium of claim 1, wherein data stored in the report buffer is periodically sent to the remote second computing system. <i>See, e.g.:</i> <i>See claim 1 above.</i> The controller shown by the schematic below is configured to push buffered data to the second computing system (e.g., Ignition Server and/or Gateway).

IIoT Architecture

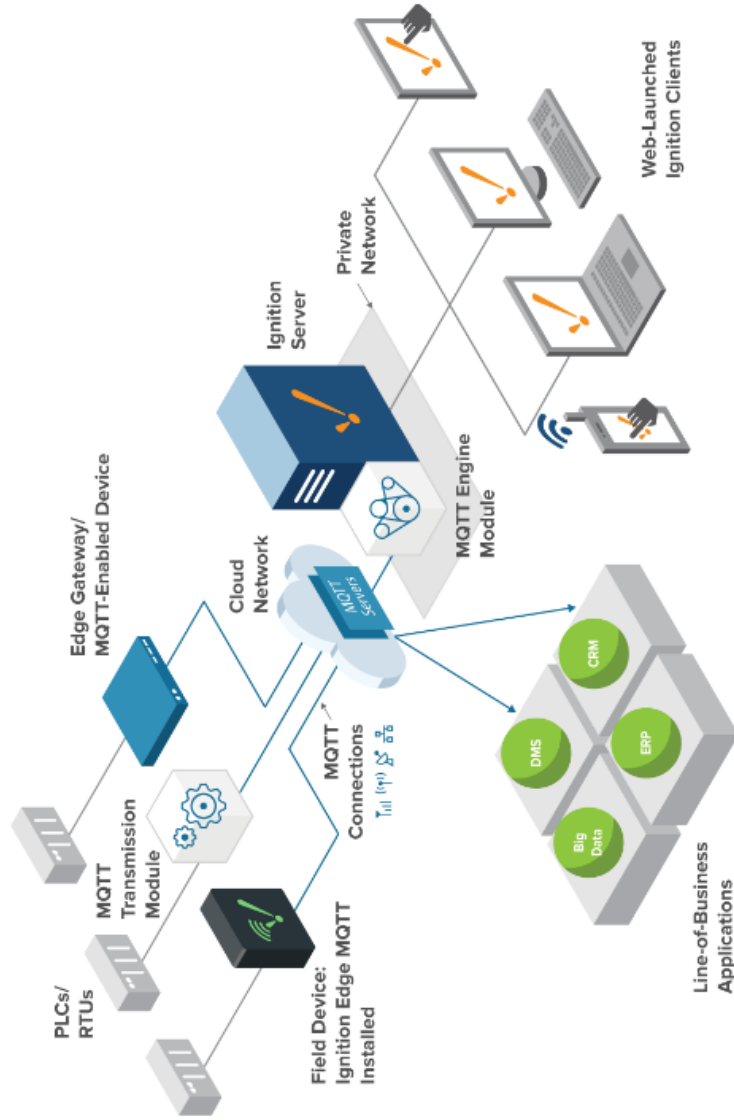


Exhibit 2.

The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 12,321,184	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 medium of claim 1, wherein the site data is obtained while network access to the remote second computing system is intermittently ceased, and wherein sending the site data occurs after network access to the remote second computing system has been restored.	The Accused System comprises the medium of claim 1, wherein the site data is obtained while network access to the remote second computing system is intermittently ceased, and wherein sending the site data occurs after network access to the remote second computing system has been restored. <i>See, e.g.:</i> <i>See claim 1 above.</i> The controller shown by the schematic below is configured to push buffered data to the second computing system (e.g., Ignition Server and/or Gateway).

IIoT Architecture

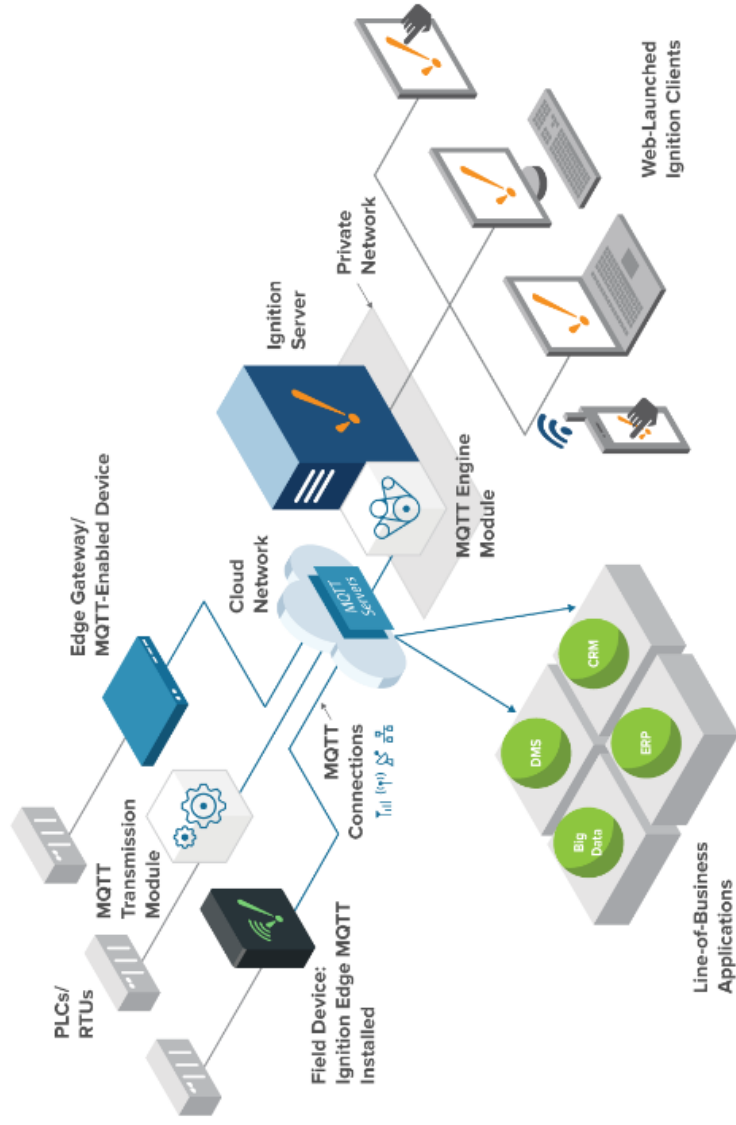


Exhibit 2.

The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 12,321,184	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 10	The Accused System comprises the medium of claim 1, wherein the fluid-handling site comprises an oil well, a petro water disposal or re-injection facility, or a petroleum pumping station. <i>See, e.g.:</i> <i>See claim 1 above.</i>  The screenshot shows the TankLogix website. At the top is the TankLogix logo. Below it is a navigation menu with links: Home, Our Services (with a dropdown arrow), About, Careers, Support, System Status, Blog, and Client Login. On the right side of the menu is a 'CONTACT US' button with an envelope icon. The main content area features a large banner image of an oilfield with a yellow and black striped structure. Overlaid on the image is the text 'Oilfield Automation, SCADA, Tank Monitoring, and More'. Exhibit 6.



[Home](#)[Our Services](#)[About](#)[Careers](#)[Support](#)[System Status](#)[Blog](#)[Client Login](#)[CONTACT US](#)

Robust Desktop Client

- ✔ Realtime & historical data views
- ✔ Tag view
- ✔ Remote control
- ✔ View and acknowledge alarms
- ✔ Alarm callout list management
- ✔ Alarm callout history
- ✔ Remote HMI access
- ✔ Map view
- ✔ API integration
- ✔ Runs on Windows, Mac, and Linux



Exhibit 1 (annotated).



Effective Monitoring

TankLogix provides complete site automation and remote management for your SWDs.

- Dual-level, high precision, magnetostriuctive sensors
- Customized pump logic to eliminate spills
- Remote login capability
- Data acquisition - All data is transmitted wirelessly and displayed online
- Dual-level sensors eliminate the risk of pumping oil down-hole

U.S. Patent No. 12,321,184	The Accused 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 Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 11	
[11] The medium of claim 1, wherein the fluid-handling site is a water handling facility.	The Accused System comprises the medium of claim 1, wherein the fluid-handling site is a water handling facility. <i>See, e.g.:</i> See claim 1 above.  Effective Monitoring TankLogix provides complete site automation and remote management for your SWDs. • Dual-level, high precision, magnetostriuctive sensors • Customized pump logic to eliminate spills • Remote login capability • Data acquisition - All data is transmitted wirelessly and displayed online • Dual-level sensors eliminate the risk of pumping oil down-hole Exhibit 12.

U.S. Patent No. 12,321,184	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 12	
[12] The medium of claim 1, the operations further comprising: detecting a leak from a signal based on a fluid-level sensor of a tank at the fluid handling site.	The Accused System comprises the medium of claim 1, the operations further comprising: detecting a leak from a signal based on a fluid-level sensor of a tank at the fluid handling site. <i>See, e.g.:</i> <i>See claim 1 above.</i> Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) Title 40, Part 112-3 states that every company or facility must have an updated spill prevention, control, and countermeasure plan. The TankWarden System can help tank owners develop a sophisticated approach to developing and implementing a prevention and control plan to satisfy the US Government's requirements. Therefore, the leak detection ability of the TankWarden can reduce the risk exposure to fines, expensive cleanups, and denied prevention plans issued by the EPA. Exhibit 5. As described in the example above, the Accused System includes a leak detector at its facilities.

U.S. Patent No. 12,321,184	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 13 [13] The medium of claim 1, wherein one of the plurality of fluid handling devices comprises an oil/water separation tank configured to separate oil from water, and wherein the plurality of commands comprises a command operative to change a level of the oil/water separation tank at which oil meets water.	The Accused System comprises the medium of claim 1, wherein one of the plurality of fluid handling devices comprises an oil/water separation tank configured to separate oil from water, and wherein the plurality of commands comprises a command operative to change a level of the oil/water separation tank at which oil meets water. <i>See, e.g.:</i> <i>See claim 1 above.</i>

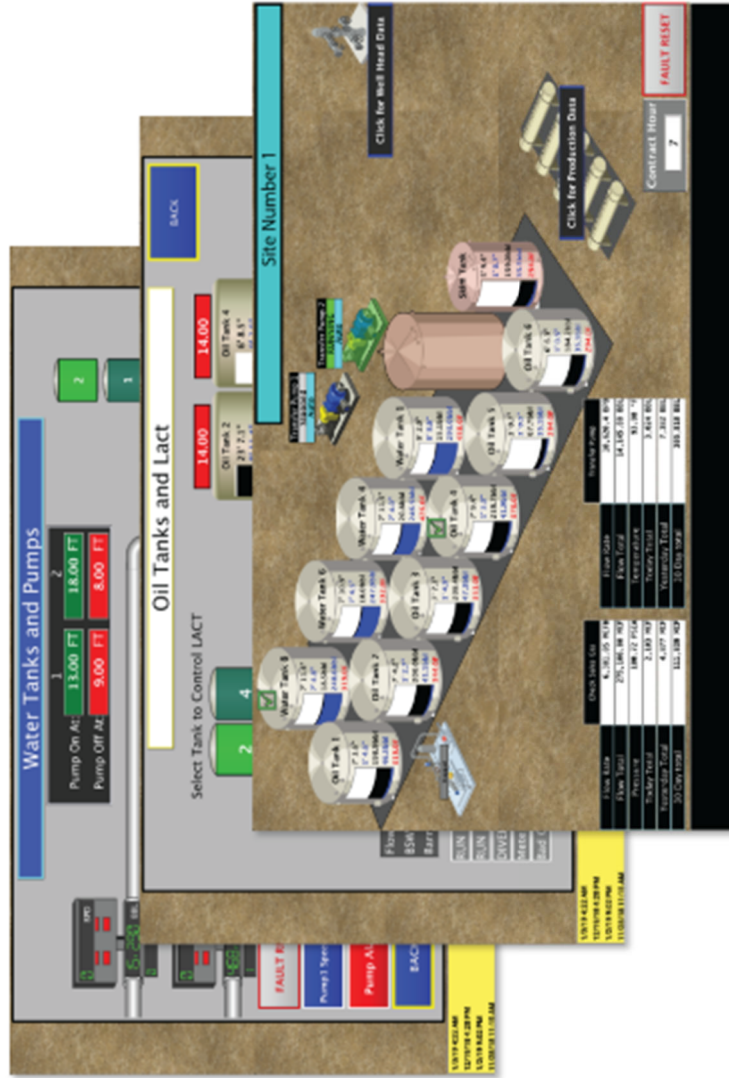




Exhibit 1. The above figures show fluid levels within separation tanks which separate oil from water.

The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro’s current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.

U.S. Patent No. 12,321,184	The Accused System
[14] The medium of claim 1, wherein: one of the plurality of different target states that change over time is determined by the first computing system in response to a rate of change in a level of a fluid in a tank.	The Accused System comprises the medium of claim 1, wherein: one of the plurality of different target states that change over time is determined by the first computing system in response to a rate of change in a level of a fluid in a tank. <i>See, e.g.:</i> <i>See claim 1 above.</i> The Accused System includes tanks with valves controlled by PID controllers that change target states over time in response to a rate of change in the level of a fluid in the tank.   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. The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags: “What Is Scripting? Most of the time when we talk about “scripting” in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant

popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with “**system**” and press `ctrl+space` to see a list of available functions. The list will filter itself as you continue typing.

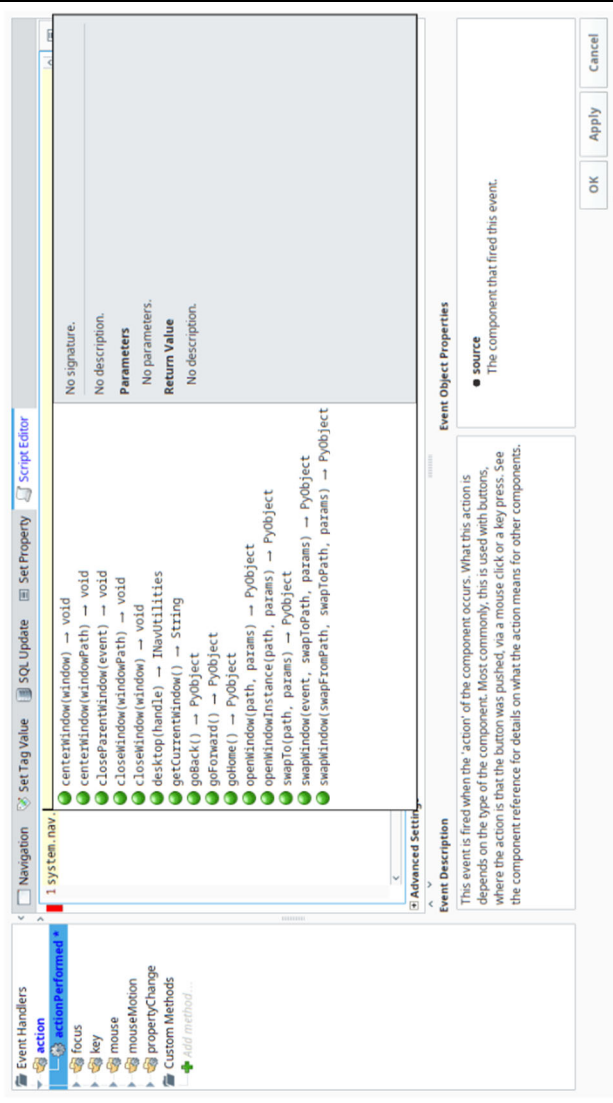


Exhibit 15.

U.S. Patent No. 12,321,184	The Accused System
	“Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways. Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema. Tags - Create a script that runs on a Tag change and when an alarm goes active!” Exhibit 15. “Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short.” Exhibit 15. “When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example.” Exhibit 16. “Script Editor The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update

U.S. Patent No. 12,321,184	The Accused System
	the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler. As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro’s current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 15 [15] The medium of claim 1, wherein: some of the plurality of different target states that change over time are operative to ramp up or down speed of a motor to mitigate shocks to up-stream or down-stream fluid-handling devices.	<i>See</i> claim 1 above. The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags: “What Is Scripting? Most of the time when we talk about “scripting” in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant

popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with “**system**” and press `ctrl+space` to see a list of available functions. The list will filter itself as you continue typing.

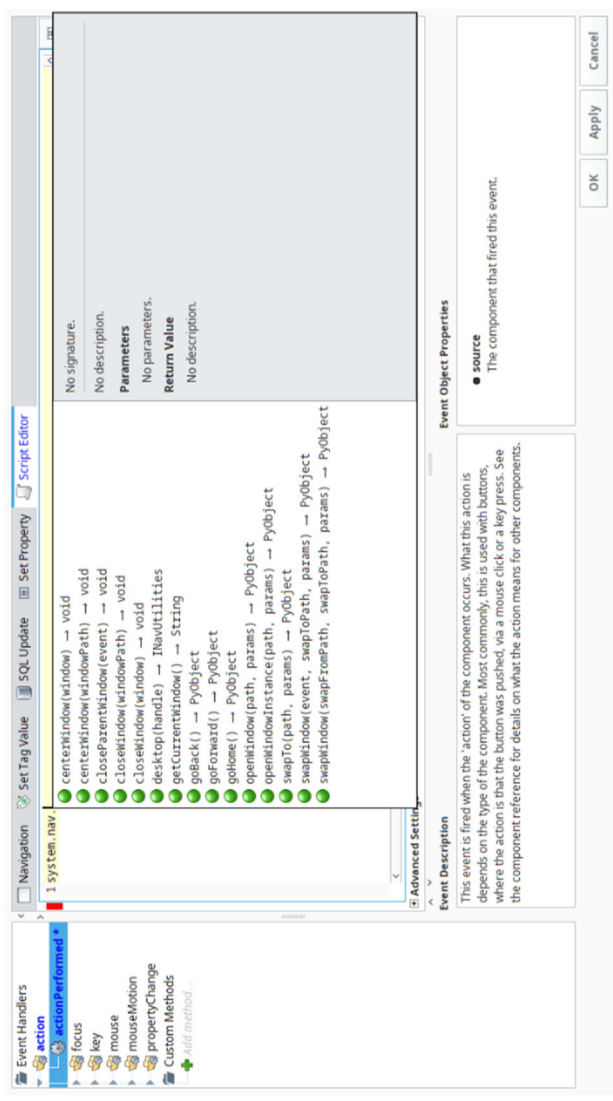


Exhibit 15.

U.S. Patent No. 12,321,184	The Accused System
	“Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways. Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema. Tags - Create a script that runs on a Tag change and when an alarm goes active!” Exhibit 15. “Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short.” Exhibit 15. “When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example.” Exhibit 16. “Script Editor The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update

U.S. Patent No. 12,321,184	The Accused System
	the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler. As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. 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	The Accused System comprises the medium of claim 1, wherein the first computing system has an automatic mode. <i>See, e.g.:</i> <i>See claim 1 above.</i>   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. 12,321,184	The Accused System
	The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags: “What Is Scripting? Most of the time when we talk about "scripting" in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with **"system"** and press `ctrl+space` to see a list of available functions. The list will filter itself as you continue typing.

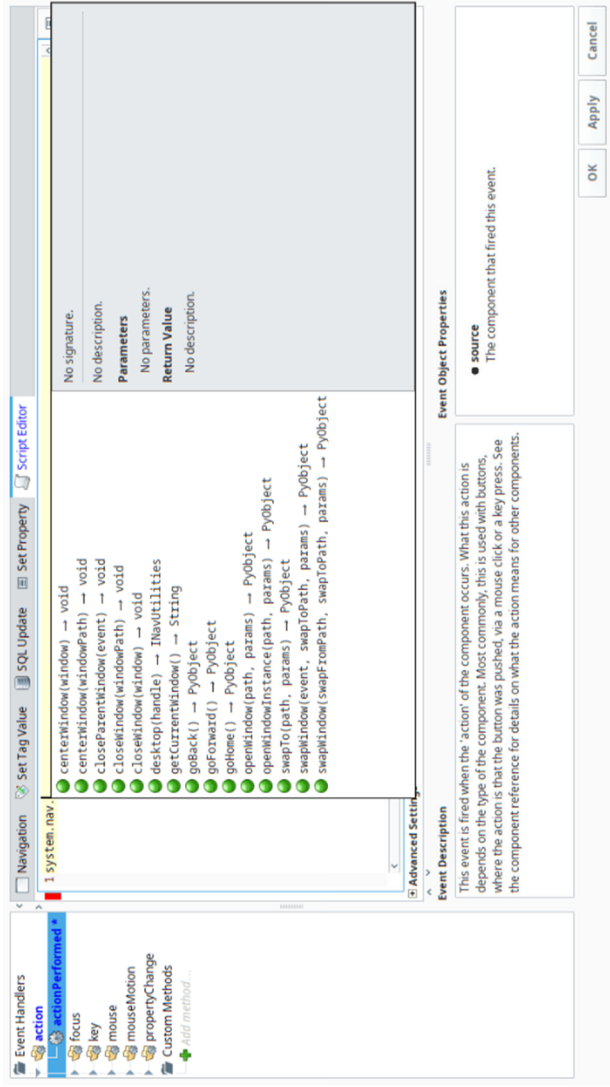


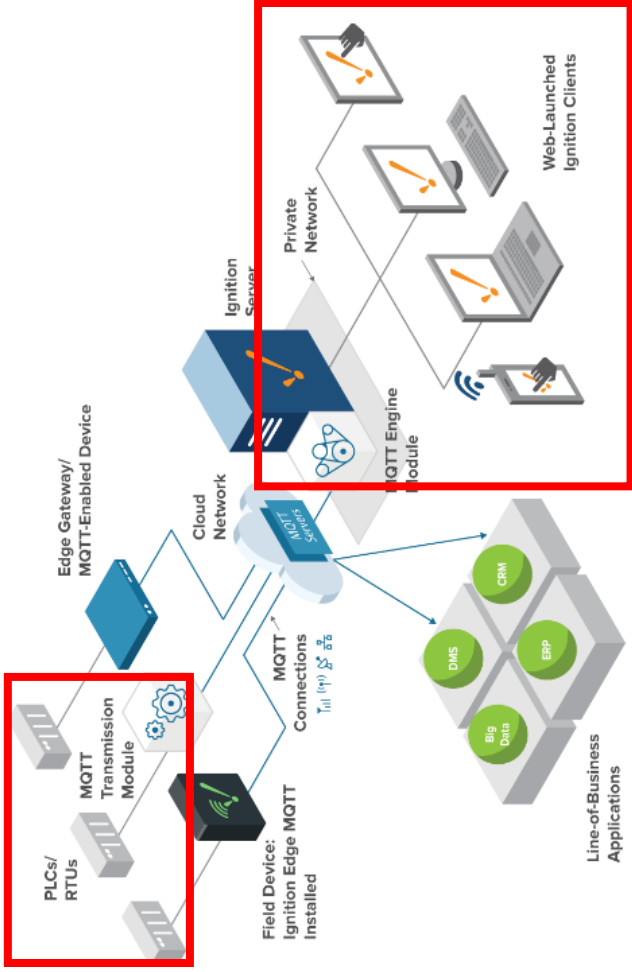
Exhibit 15.

“Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways.

Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema.

U.S. Patent No. 12,321,184	The Accused System
	Tags - Create a script that runs on a Tag change and when an alarm goes active!" Exhibit 15. "Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short." Exhibit 15. "When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example." Exhibit 16. "Script Editor The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler.

U.S. Patent No. 12,321,184	The Accused System
	As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. Further, the PLC and Ignition Edge module are configured to continue operation in the event of a network loss, comprising an automatic mode. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro’s current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 17	
[17] The medium of claim 1, wherein the first computing system has a mixed automatic mode.	The Accused System comprises the medium of claim 1, wherein the first computing system has a mixed automatic mode. <i>See, e.g.:</i> <i>See claim 1 above.</i> 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 (e.g., manually), and then automatically executes the commands (e.g., automatically):

U.S. Patent No. 12,321,184	The Accused System
	IIoT Architecture  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 18	

U.S. Patent No. 12,321,184	The Accused System
[18] The medium of claim 1, comprising: prior to sending at least some of the translated commands, checking the at least some of the translated commands or their corresponding received commands for validity based on a current condition of the fluid-handling site to prevent a commanded action from harming the plurality of fluid-handling devices.	The Accused System comprises the medium of claim 1, comprising: prior to sending at least some of the translated commands, checking the at least some of the translated commands or their corresponding received commands for validity based on a current condition of the fluid-handling site to prevent a commanded action from harming the plurality of fluid-handling devices. <i>See, e.g.:</i> <i>See claim 1 above.</i> For example, on information and belief, the client interface, Ignition Server, and/or PLCs in the Accused System include control logic to check whether a manual control value falls within boundary thresholds. Furthermore, fluid-handling devices equipped with VFDs similarly check incoming commands against preset boundary values. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 19	The Accused System comprises the medium of claim 18, wherein checking for validity comprises checking against a maximum or minimum liquid level for a tank. <i>See, e.g.:</i> <i>See claim 18 above.</i> For example, on information and belief, the client interface, Ignition Server, and/or PLCs in the Accused System include control logic to check whether a manual control value
[19] The medium of claim 18, wherein checking for validity comprises checking against a maximum or minimum liquid level for a tank.	

U.S. Patent No. 12,321,184	The Accused System
	falls within boundary thresholds. Furthermore, fluid-handling devices equipped with VFDs similarly check incoming commands against preset boundary values. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 20	
[20] The medium of claim 1, wherein translating abstracts details of site-specific implementation of the first computing system.	The Accused System comprises the medium of claim 1, wherein translating abstracts details of site-specific implementation of the first computing system. <i>See, e.g.:</i> <i>See claim 1 above.</i> The local controller is, for example, a variable-frequency drive (VFD). For example, the facility includes a fluid-handling device (e.g., pump with an actuator) and a motor powered by a VFD:

U.S. Patent No. 12,321,184	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 21	
[21.1] The medium of claim 1, wherein: the first computing system comprises a site master controller located at the fluid-handling site; and	The Accused System comprises the medium of claim 1, wherein: the first computing system comprises a site master controller located at the fluid-handling site. <i>See, e.g.:</i> <i>See claim 1 above.</i>

IIoT Architecture

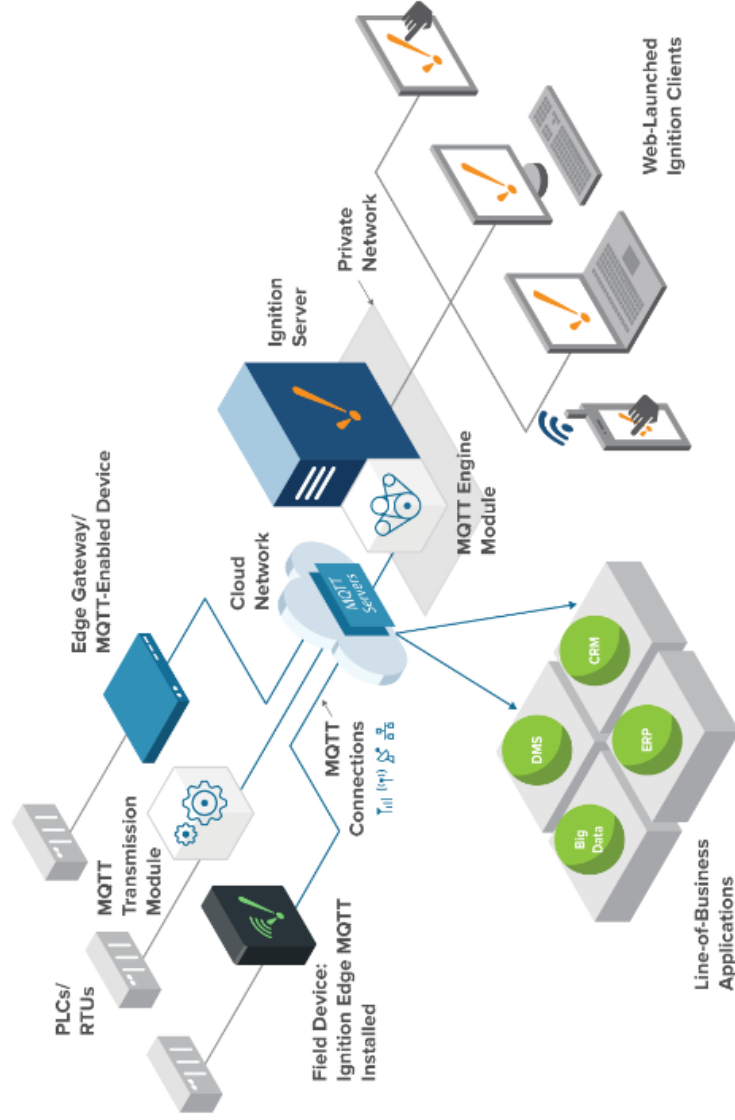


Exhibit 2. A PLC and/or Ignition Edge module is an example of a site master controller located at a fluid-handling site.

The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro’s current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 12,321,184	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.
[21.2] the second computing system comprises a command center server in communication with a plurality of other site master controllers at a plurality of other fluid-handling sites. See, e.g.:	IIoT Architecture Exhibit 2. A PLC and/or Ignition Edge module is an example of a site master controller located at a fluid-handling site. The Ignition Server and/or Gateway modules are

U.S. Patent No. 12,321,184	The Accused System
	examples of a command center server in communication with a plurality of site master controllers. <i>See also</i> limitation [21.1] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
Claim 22	
[22] The medium of claim 1, wherein the command interface is presented on the in a web browser executing on the remote user computing device.	The Accused System comprises the medium of claim 1, wherein the command interface is presented on in a web browser executing on the remote user computing device. <i>See, e.g.:</i> <i>See</i> claim 1 above.

IIoT Architecture

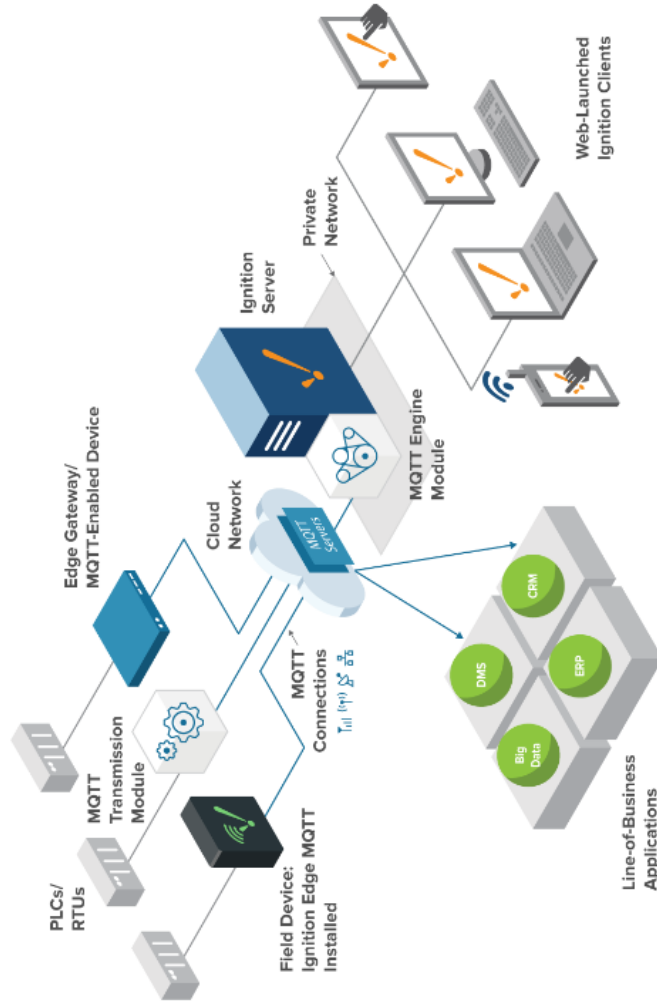


Exhibit 2.



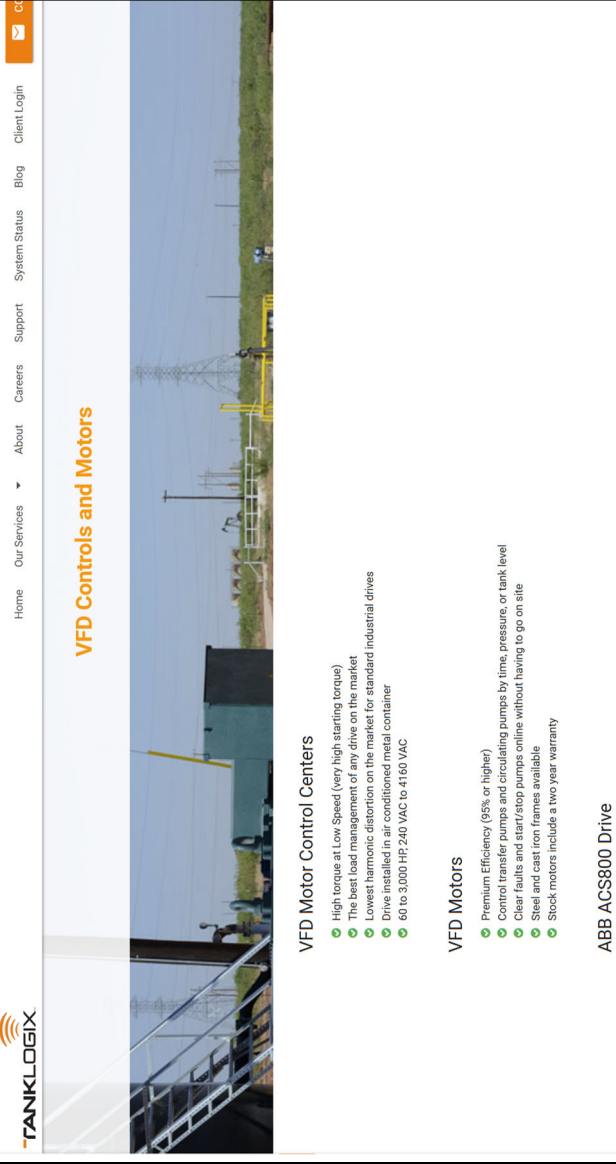
Exhibit 1.

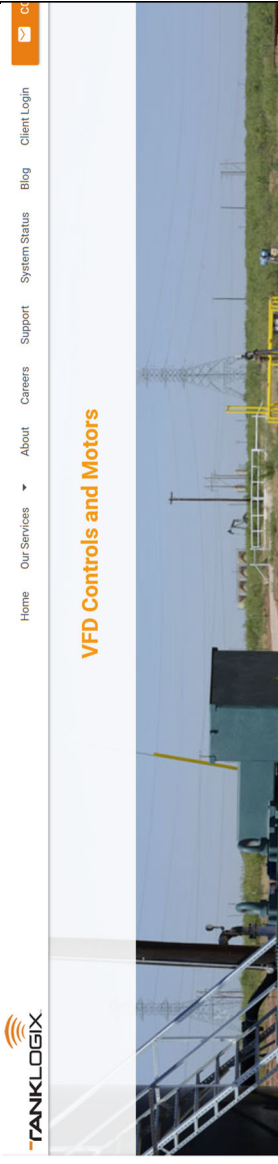
Moreover, Inductive Automation’s website states “the applications you build in Perspective will look beautiful, and run natively on your device or in any major browser.” Exhibit 14.

The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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. 12,321,184	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 23	[23.1] The medium of claim 1, wherein: after pushing, receiving another command configured to instruct a feed-forward-controlled fluid-handling device among the plurality of fluid-handling devices to adjust to attain a target state, the feedforward control being based on a table or formula applied by a local controller of the feed-forward-controlled fluid-handling device. <i>See, e.g.:</i> <i>See claim 1 above.</i>   VFD Motors ✓ Premium Efficiency (95% or higher) ✓ Control transfer pumps and circulating pumps by time, pressure, or tank level ✓ Clear faults and start/stop pumps online without having to go on site ✓ Steel and cast iron frames available ✓ Stock motors include a two year warranty Exhibit 3. On information and belief, the first computer system effectuates commands by instructing, for example, a pump equipped with feed-forward-control and a VFD to adjust to attain a target state. The VFD ramps up or down the speed of the pump using a table or formula applied by the VFD controller, during which the speed of the pump gradually changes over time from an initial state to the target state.

U.S. Patent No. 12,321,184	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.
[23.2] the operations comprise: translating the other command to produce a translated command and sending the translated command to the feed-forward-controlled fluid-handling device;	The Accused System comprises the operations comprise: translating the other command to produce a translated command and sending the translated command to the feed-forward-controlled fluid-handling device. <i>See, e.g.:</i> The local controller is, for example, a variable-frequency drive (VFD). For example, the facility includes a fluid-handling device (e.g., pump with an actuator) and a motor powered by a VFD:

U.S. Patent No. 12,321,184	The Accused System
[23.3] obtaining sensor data characterizing a response of the feed-forward-controlled fluid-handling device to the translated command; and	The Accused System comprises obtaining sensor data characterizing a response of the feed-forward-controlled fluid-handling device to the translated command. <i>See, e.g.:</i> On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.  The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 12,321,184	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.
[23.4] determining, by the first computing system, to send another command to the feed-forward-controlled fluid-handling device to make a further adjustment based on the sensor data characterizing the response.	The Accused System comprises determining, by the first computing system, to send another command to the feed-forward-controlled fluid-handling device to make a further adjustment based on the sensor data characterizing the response. <i>See, e.g.:</i> On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.  VFD Motor Control Centers - High torque at Low Speed (very high starting torque) - The best load management of any drive on the market - Lowest harmonic distortion on the market for standard industrial drives - Drive installed in air conditioned metal container 60 to 3,000 HP/240 VAC to 4160 VAC 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 ABB ACS800 Drive

U.S. Patent No. 12,321,184	The Accused System
	Exhibit 3. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines that instruct fluid-handling devices to make further adjustments based upon the sensor data received. 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 24 [24.1] The medium of claim 1, wherein: a given command among the plurality of commands is configured to instruct one of the fluid-handling devices among the plurality of fluid-handling devices to adjust to attain another target state; and	The Accused System comprises the medium of claim 1, wherein: a given command among the plurality of commands is configured to instruct one of the fluid-handling devices among the plurality of fluid-handling devices to adjust to attain another target state. <i>See, e.g.:</i> <i>See claim 1 above.</i>

IIoT Architecture

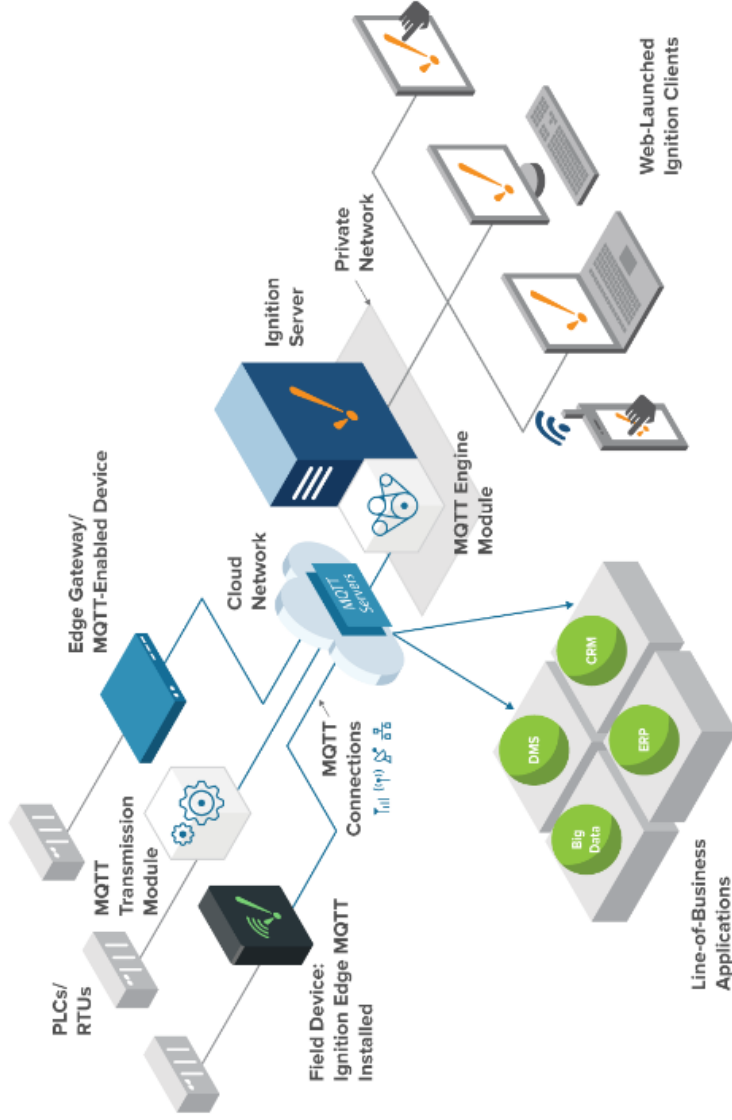


Exhibit 2.

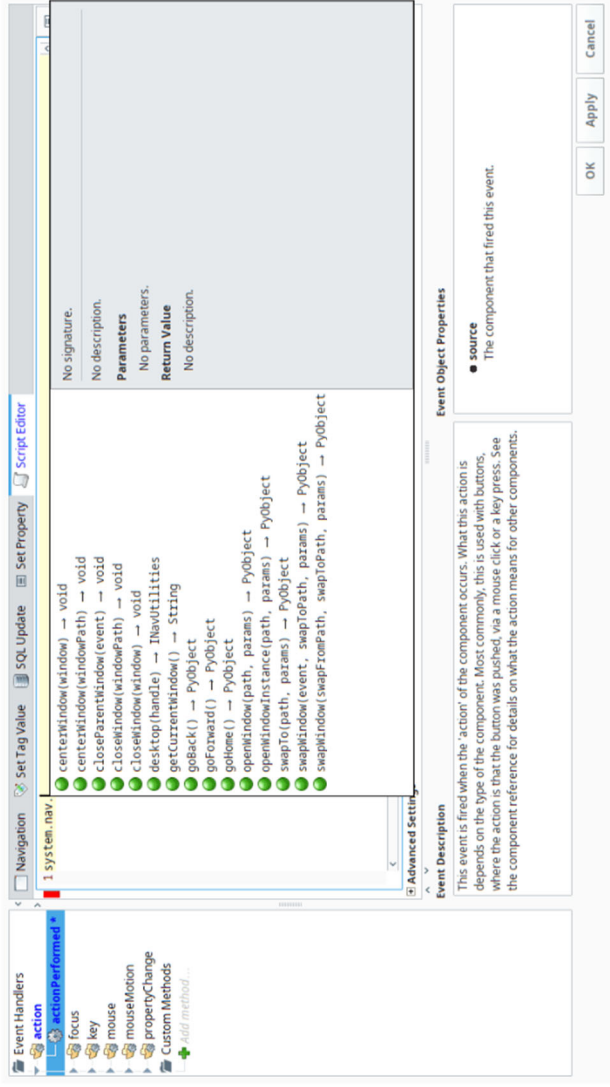
The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags:

“What Is Scripting?”

Most of the time when we talk about "scripting" in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with **"system"** and press **ctrl+space** to see a list of available functions. The list will filter itself as you continue typing.



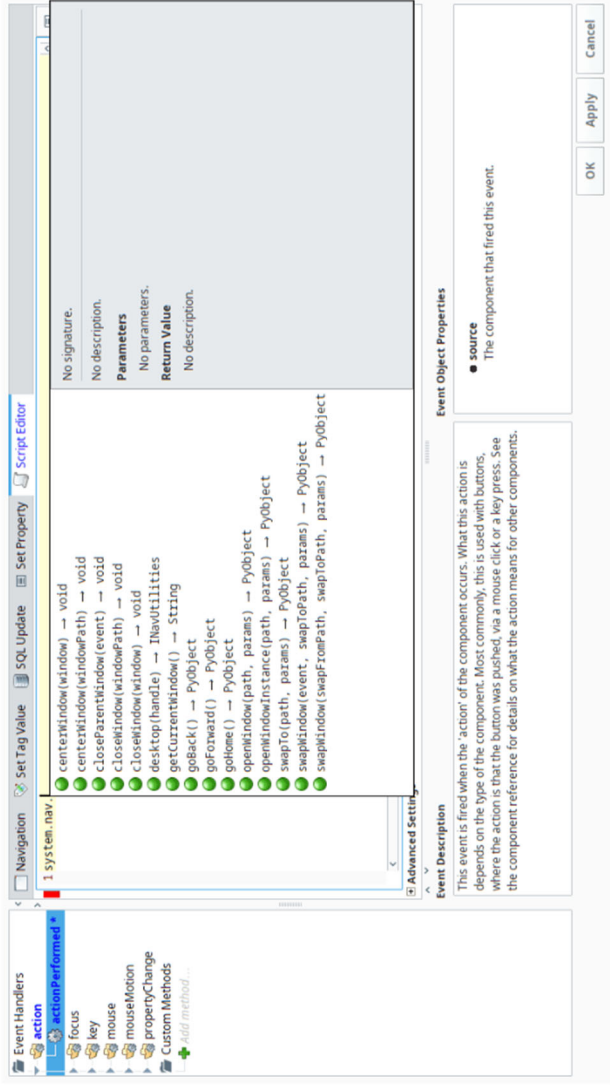
U.S. Patent No. 12,321,184	The Accused System
	Exhibit 15. “Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways. Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema. Tags - Create a script that runs on a Tag change and when an alarm goes active!” Exhibit 15. “Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short.” Exhibit 15. “When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example.” Exhibit 16. “Script Editor

U.S. Patent No. 12,321,184	The Accused System
	The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler. As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. 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.
[24.2] the operations comprise: translating the given command to produce a translated command and sending the translated command to the one of the fluid-handling devices;	The Accused System comprises the operations comprise: translating the given command to produce a translated command and sending the translated command to the one of the fluid-handling devices. <i>See, e.g.:</i> The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags: “What Is Scripting?

Most of the time when we talk about "scripting" in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with **"system"** and press **ctrl+space** to see a list of available functions. The list will filter itself as you continue typing.



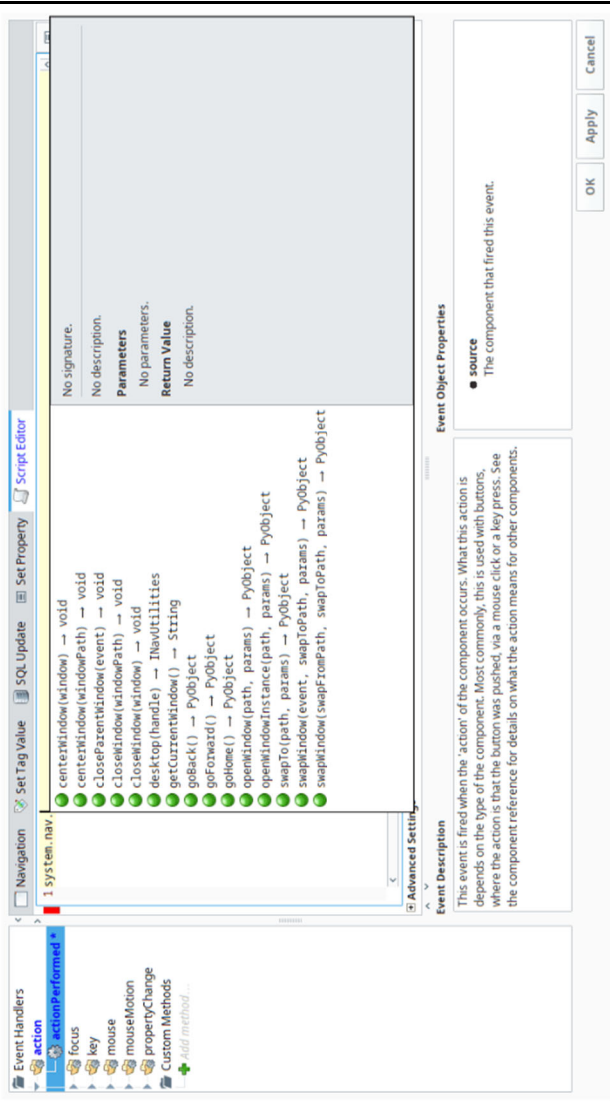
U.S. Patent No. 12,321,184	The Accused System
	Exhibit 15. “Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways. Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema. Tags - Create a script that runs on a Tag change and when an alarm goes active!” Exhibit 15. “Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short.” Exhibit 15. “When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example.” Exhibit 16. “Script Editor

U.S. Patent No. 12,321,184	The Accused System
	The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler. As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. On information and belief, the Accused System is configured to translate commands from the server system in TCP/IP to commands in a variety of protocols, such as digital or analog outputs understood by the various fluid-handling devices. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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.
[24.3] obtaining sensor data characterizing a response of the one of the fluid-handling devices to the translated command; and	The Accused System comprises obtaining sensor data characterizing a response of the one of the fluid-handling devices to the translated command; and The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags: “What Is Scripting?

Most of the time when we talk about "scripting" in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with **"system"** and press **ctrl+space** to see a list of available functions. The list will filter itself as you continue typing.



U.S. Patent No. 12,321,184	The Accused System
	Exhibit 15. “Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways. Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema. Tags - Create a script that runs on a Tag change and when an alarm goes active!” Exhibit 15. “Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short.” Exhibit 15. “When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example.” Exhibit 16. “Script Editor

U.S. Patent No. 12,321,184	The Accused System
	The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler. As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines or custom logic routines that characterize responses of 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.
[24.4] determining, by the first computing system, to send another command to the one of the fluid-handling devices to make a further adjustment based on the sensor data characterizing the response.	The Accused System comprises determining, by the first computing system, to send another command to the one of the fluid-handling devices to make a further adjustment based on the sensor data characterizing the response. <i>See, e.g.:</i> The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags:

U.S. Patent No. 12,321,184	The Accused System
	“What Is Scripting?” Most of the time when we talk about "scripting" in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with **"system"** and press `ctrl+space` to see a list of available functions. The list will filter itself as you continue typing.

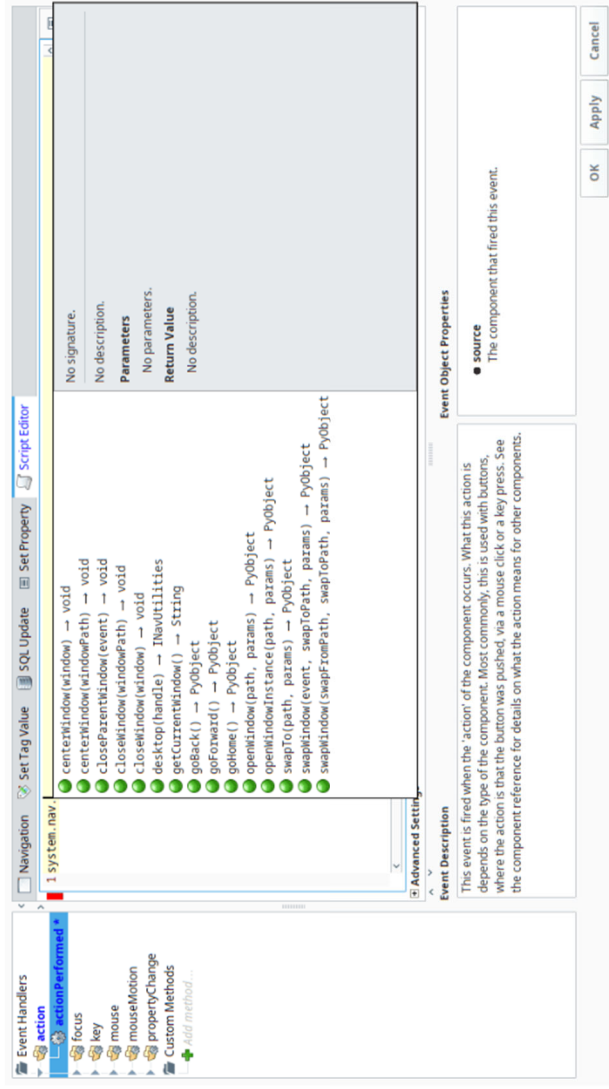


Exhibit 15.

“Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways.

Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema.

U.S. Patent No. 12,321,184	The Accused System
	Tags - Create a script that runs on a Tag change and when an alarm goes active!" Exhibit 15. "Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short." Exhibit 15. "When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example." Exhibit 16. "Script Editor The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler.

U.S. Patent No. 12,321,184	The Accused System
	As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines or custom logic routines that instruct fluid-handling devices to make further adjustments based upon the sensor data received. 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 25	
[25] The medium of claim 1, the operations further comprising: exercising feedback control, by the first computing system, of one of the fluid-handling devices among the plurality of fluid-handling devices based on first sensor data by adjusting a target sent to a local controller of the one of the fluid-handling devices.	The Accused System comprises the medium of claim 1, the operations further comprising: exercising feedback control, by the first computing system, of one of the fluid-handling devices among the plurality of fluid-handling devices based on first sensor data by adjusting a target sent to a local controller of the one of the fluid-handling devices. <i>See, e.g.:</i> <i>See claim 1 above.</i> The Accused System also includes custom scripting capabilities that allow a user to configure commands that correspond to a plurality of different target states over time. For example, Ignition provides custom event-driven scripting capability that allows for functionality such as the updating of tags:

U.S. Patent No. 12,321,184	The Accused System
	“What Is Scripting?” Most of the time when we talk about "scripting" in Ignition we are talking about Python scripting, or writing code in the Python language. Python is a general purpose programming language that was developed in the early 1990s and has gained significant popularity in the 2000s. It is extremely readable, elegant, powerful, and easy to learn. As an added bonus, it gracefully interacts with Java, giving programmers an extremely powerful tool when paired with Ignition, which is written in Java.” Exhibit 15.

Is It Easy to Use?

Luckily, Python is a simple language to get started with. Using it in an event-driven system takes away a lot of the extra code that normally makes programming time consuming. For those that are already familiar with scripting (and those of you that are learning), we have a huge list of functions inside Ignition to do some of the common tasks in a single line of code. These **System Functions** are available while typing. Just start with **"system"** and press `ctrl+space` to see a list of available functions. The list will filter itself as you continue typing.

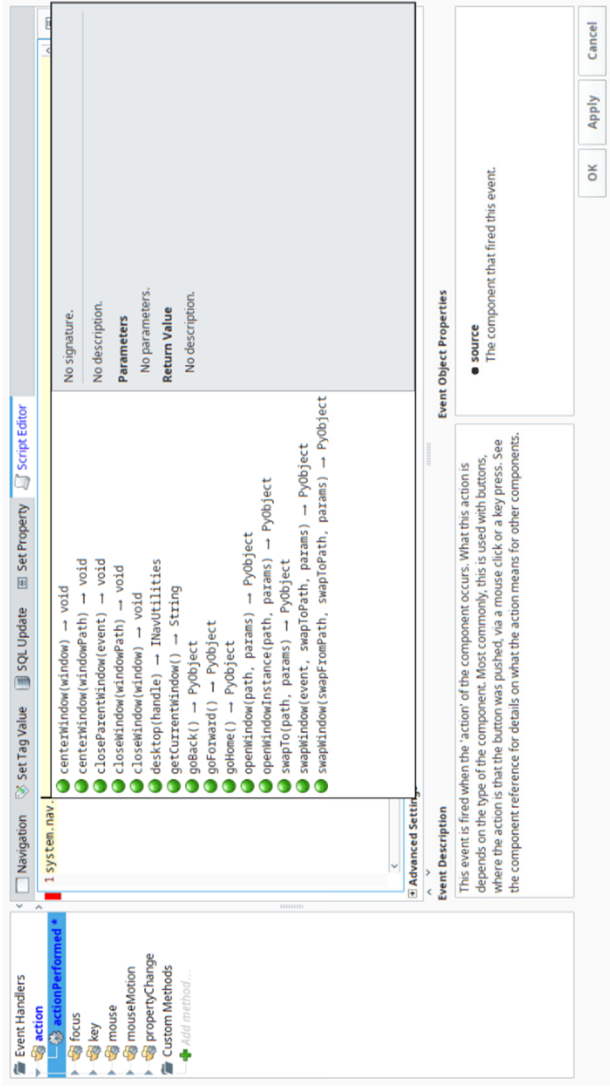


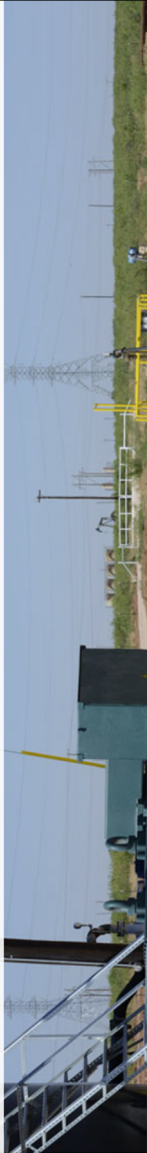
Exhibit 15.

“Python is used in many places in Ignition. Each location has its own events that trigger your scripts to run, and add functionality to your projects in different ways.

Components - Add actions to components like buttons, customize the look and feel of charts and tables, and even set up a custom navigation schema.

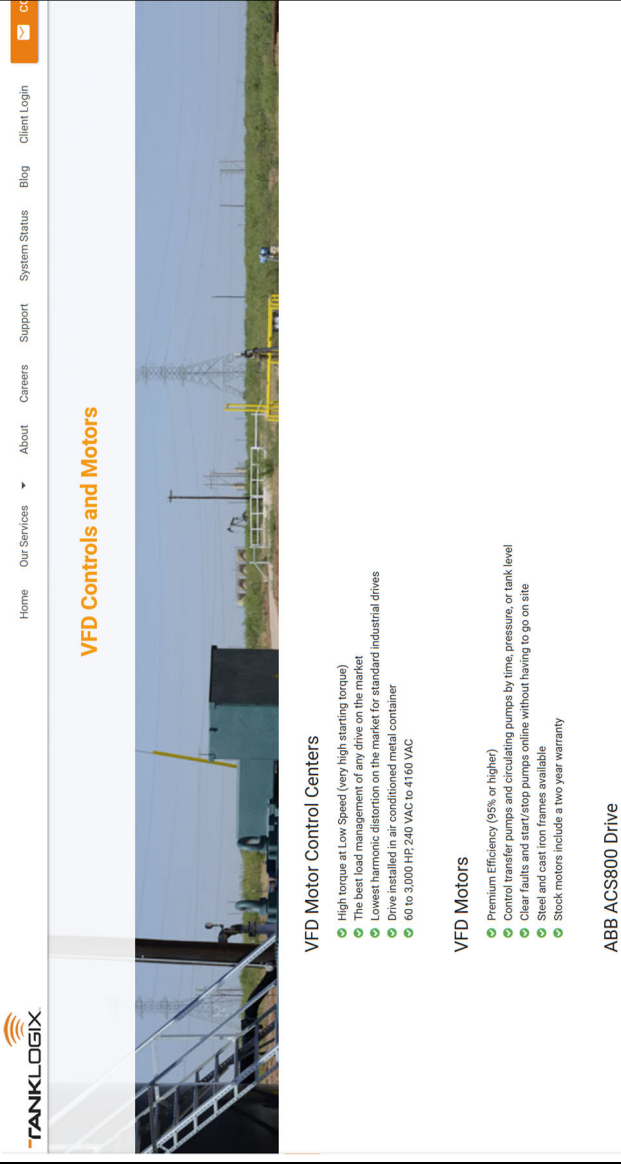
U.S. Patent No. 12,321,184	The Accused System
	Tags - Create a script that runs on a Tag change and when an alarm goes active!" Exhibit 15. "Users that are new to Ignition focus mainly on the Component Binding system in Vision or Perspective, and for good reason. It's simple, flexible, and generally easy to understand without much of a computer background. However, Ignition has a complete scripting system built into every place you can think of. Using it is not a requirement, but it can add a significant degree of flexibility and customization to your projects. It allows you to create exactly what you need, giving you total control where pre-canned options fall short." Exhibit 15. "When creating an Event Handler on a component, you can use one of the handy Script Builders instead of writing your own script. In the Component Scripting window, the Script Builders are accessible as tabs along the top. Each tab represents a different kind of action that users can associate with an event. The last tab, Script Editor, lets you write your own event handler. You can also use the Script Editor tab to view a script that was generated by one of the builders, which is a good way to get started learning how to write your own event handlers. Each script builder example on this page shows the actual script in the Script Editor, just simply click the link under each example." Exhibit 16. "Script Editor The Script Editor allows you to add more complexity to existing scripts, combine scripts, and even write your own custom scripts. For example, if you need to perform two or more actions at once, (i.e., set a Tag and navigate to another window), you can update the script by combining the two actions in the Script Editor. The Script Editor even gives you the flexibility to create your own code for any action you want to perform on an event handler.

U.S. Patent No. 12,321,184	The Accused System
	As seen elsewhere on this page, the other builders ultimately generate a script that can be modified from the Script Editor Builder.” Exhibit 16. Exhibit 3. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines that instruct fluid-handling devices to make further adjustments based upon the sensor data received. 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 26 [26] The medium of claim 25, wherein the local controller also exercises feedback control of a state of the one of the fluid-handling devices using proportional-integral-derivative control.	The Accused System comprises the medium of claim 25, wherein the local controller also exercises feedback control of a state of the one of the fluid-handling devices using proportional-integral-derivative control. <i>See, e.g.:</i> <i>See claim 25 above.</i> On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.

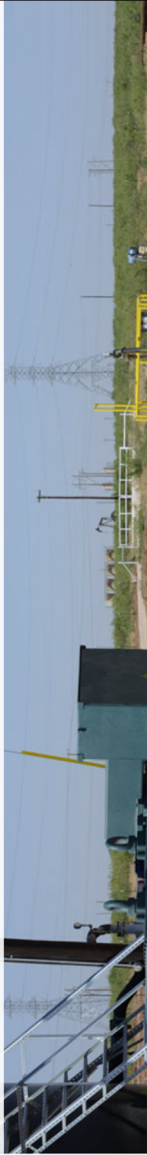
U.S. Patent No. 12,321,184	The Accused System  Home Our Services About Careers Support System Status Blog Client Login VFD Controls and Motors  VFD Motor Control Centers ✔ High torque at Low Speed (very high starting torque) ✔ The best load management of any drive on the market ✔ Lowest harmonic distortion on the market for standard industrial drives ✔ Drive installed in air conditioned metal container ✔ 60 to 3,000 HP/240 VAC to 4160 VAC 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 ABB ACS800 Drive Exhibit 3. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines or custom logic routines that instruct fluid-handling devices to make further adjustments based upon the sensor data received. 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. 12,321,184	The Accused System
Claim 27	
[27.1] The medium of claim 1, the operations further comprising: exercising feedback control, by the first computing system, of a first fluid-handling device among the plurality of fluid handling devices based on first sensor data by adjusting a first target state sent to a first local controller of the first fluid-handling device, the first local controller also exercising feedback control of the first fluid-handling device. <i>See, e.g.:</i> <i>See claim 1 above.</i> On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.	The Accused System comprises the medium of claim 1, the operations further comprising: exercising feedback control, by the first computing system, of a first fluid-handling device among the plurality of fluid handling devices based on first sensor data by adjusting a first target state sent to a first local controller of the first fluid-handling device, the first local controller also exercising feedback control of the first fluid-handling device. <i>See, e.g.:</i> <i>See claim 1 above.</i> On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.

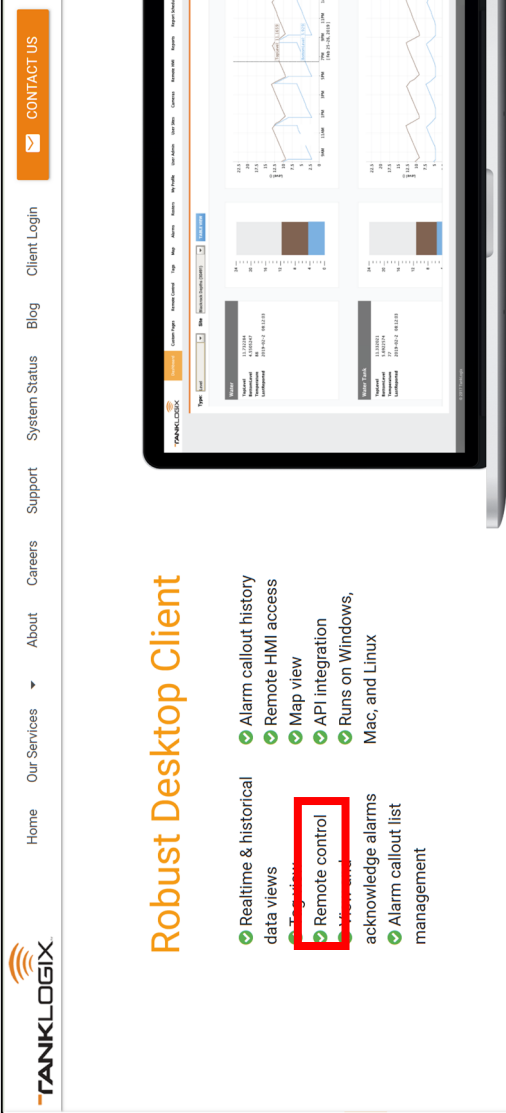
U.S. Patent No. 12,321,184	The Accused System  Home Our Services About Careers Support System Status Blog Client Login VFD Controls and Motors  VFD Motor Control Centers ✔ High torque at Low Speed (very high starting torque) ✔ The best load management of any drive on the market ✔ Lowest harmonic distortion on the market for standard industrial drives ✔ Drive installed in air conditioned metal container ✔ 60 to 3,000 HP/240 VAC to 4160 VAC 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 ABB ACS800 Drive Exhibit 3. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines or custom logic routines that instruct fluid-handling devices to make further adjustments based upon the sensor data received. 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. 12,321,184	The Accused System
[27.2] exercising feedback control, by the first computing system, of a second fluid-handling device based on second sensor data by adjusting a second target state by adjusting a second local controller of the second fluid-handling device, the second local controller exercising feedforward control of second the fluid-handling device.	The Accused System comprises exercising feedback control, by the first computing system, of a second fluid-handling device based on second sensor data by adjusting a second target state sent to a second local controller of the second fluid-handling device, the second local controller exercising feedforward control of second the fluid-handling device. <i>See, e.g.:</i> On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.  Exhibit 3. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines that instruct fluid-handling devices to make further adjustments based upon the sensor data received.

U.S. Patent No. 12,321,184	The Accused System
	On information and belief, the first computer system effectuates commands by instructing, for example, a pump equipped with feed-forward-control and a VFD to adjust to attain a target state. The VFD ramps up or down the speed of the pump using a table or formula applied by the VFD controller, during which the speed of the pump gradually changes over time from an initial state to the target 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 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 28	The Accused System comprises the medium of claim 1, the operations further comprising: after sending the translated commands, obtaining, with the first computing system, sensor data from the given fluid-handling device among the plurality of fluid-handling devices and confirming, with the first computing system, that at least some of the translated commands were executed based on the received sensor data. <i>See, e.g.:</i> <i>See claim 1 above.</i> On information and belief, the Accused System also includes at least some fluid-handling devices such as VFDs (variable frequency drives) including proportional-integral-derivative (PID) controllers that determine a plurality of target states over time.

U.S. Patent No. 12,321,184	The Accused System  Home Our Services About Careers Support System Status Blog Client Login  VFD Controls and Motors  VFD Motor Control Centers ✔ High torque at Low Speed (very high starting torque) ✔ The best load management of any drive on the market ✔ Lowest harmonic distortion on the market for standard industrial drives ✔ Drive installed in air conditioned metal container ✔ 60 to 3,000 HP/240 VAC to 4160 VAC 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 ABB ACS800 Drive Exhibit 3. On information and belief, the first computing system (e.g. PLC and/or Ignition Edge module) obtains sensor data and implements PID routines or custom logic routines that confirm whether fluid-handling devices have executed the command based upon the sensor data received. 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. 12,321,184	The Accused System
Claim 29	
[29] The medium of claim 1, the operations comprising: steps for exercising remote control of the fluid-handling devices.	The Accused System comprises the medium of claim 1, the operations comprising: steps for exercising remote control of the fluid-handling devices. <i>See, e.g.:</i> <i>See claim 1 above.</i> This claim element invokes 35 U.S.C. Section 112, para. 6. An example of corresponding structure is described at '184 Patent, 3:24-34, which states: "FIG. 1 illustrates a computing environment 10 having a control system 12 that, in some implementations, addresses some or all of the above-mentioned deficiencies in certain SCADA systems for exercising remote control of fluid-handling devices. As explained in greater detail below, the control system 12 of this embodiment includes a command-center server 14 and site master-controllers 16 (specifically, in this example, three such site master- controllers 18, 20, and 22) that cooperate to facilitate remote control at a fluid-handling site 24 from user devices 26 or 28 via the Internet 30." <i>See also</i> '184 Patent, FIG. 1.

U.S. Patent No. 12,321,184	The Accused System  Robust Desktop Client - Realtime & historical data views - Remote control - Alarm callout history - Remote HMI access - Map view - API integration - Runs on Windows, Mac, and Linux - acknowledge alarms - Alarm callout list management 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 30	
[30.1] A system, comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a system. <i>See, e.g.:</i>

U.S. Patent No. 12,321,184	The Accused System   Oilfield Automation, SCADA, Tank Monitoring, and More 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.
[30.2] a plurality of fluid handling devices; and	The Accused System comprises a plurality of fluid handling devices. See, e.g.:

Exhibit 2.

Exhibit 6.

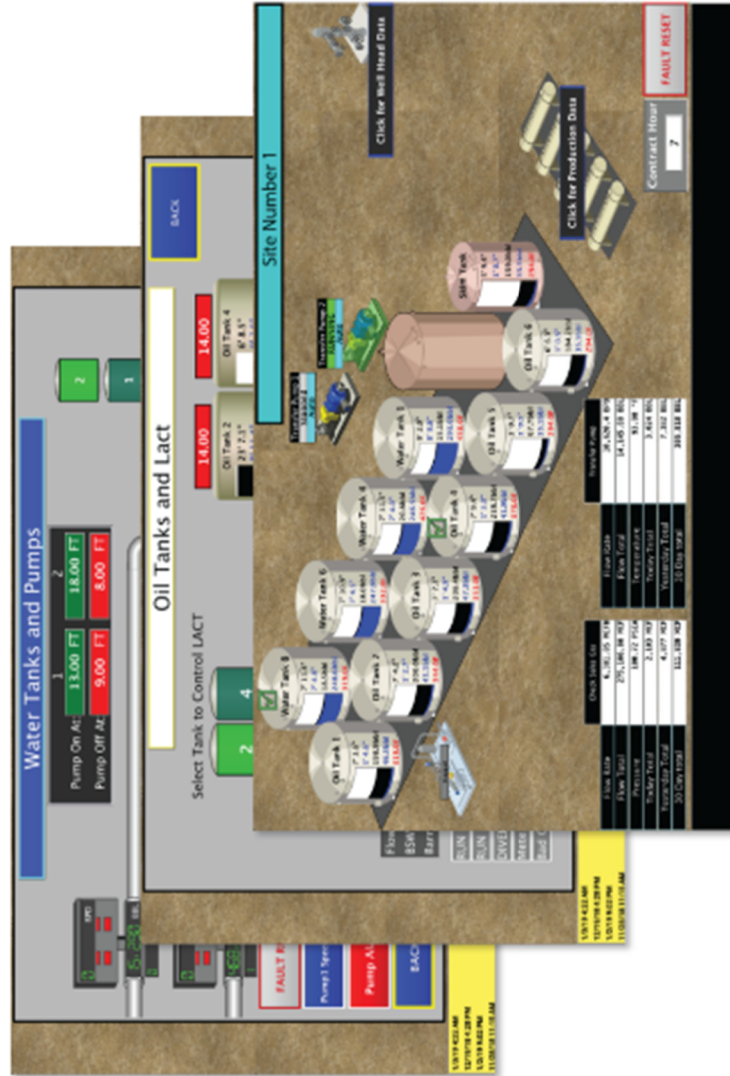
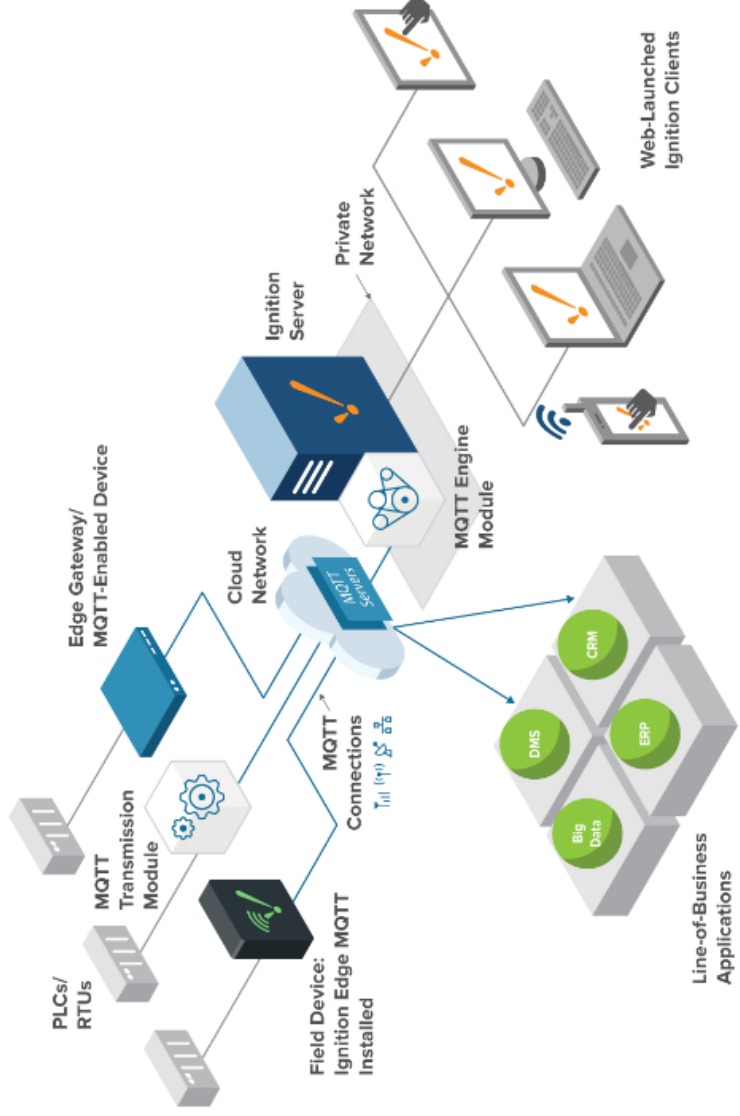




Exhibit 1.

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.

U.S. Patent No. 12,321,184	The Accused System
[30.3] a first computing system communicatively coupled to the plurality of fluid handling devices, the first computing system storing instructions that, when executed by the first computing system, effectuate operations comprising:	The Accused System comprises a first computing system communicatively coupled to the plurality of fluid handling devices, the first computing system storing instructions that, when executed by the first computing system, effectuate operations. <i>See, e.g.:</i> IIoT Architecture  The diagram illustrates an IIoT (Industrial Internet of Things) architecture. On the left, 'PLCs/RTUs' (Programmable Logic Controllers/Remote Terminal Units) are connected to an 'MQTT Transmission Module' (represented by a gear icon). This module connects to an 'Edge Gateway/MQTT-Enabled Device' (a blue box). The gateway connects to a 'Cloud Network' (a cloud icon). Within the cloud network is an 'MQTT Server' (a blue box). A 'Field Device: Ignition Edge MQTT Installed' (a black box with a green signal icon) also connects to the MQTT Server. The MQTT Server connects to an 'MQTT Engine Module' (a blue box with a gear icon). This module connects to an 'Ignition Server' (a blue box with a gear icon). The Ignition Server connects to a 'Private Network' (a blue box). Finally, the Private Network connects to 'Web-Launched Ignition Clients' (represented by laptop and tablet icons). On the right side of the diagram, a 'Line-of-Business Applications' block contains four green circles labeled 'Big Data', 'DMS', 'CRM', and 'ERP'. Arrows indicate data flow from the MQTT Server to these applications. Exhibit 2. In the Accused System, the first computing system (e.g., PLC and/or Ignition Edge module) has memory storing instructions to execute the Accused System.

U.S. Patent No. 12,321,184	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.
[30.4] receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices. <i>See, e.g.:</i> <i>See claim limitation [1.2] above.</i> 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.	The Accused System comprises receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices. <i>See, e.g.:</i> <i>See claim limitation [1.2] above.</i> 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.
[30.5] the plurality of commands are responsive to inputs to a command interface presented on a remote user computing device, and	The Accused System comprises the plurality of commands are responsive to inputs to a command interface presented on a remote user computing device. <i>See, e.g.:</i> <i>See claim limitation [1.3] above.</i> The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 12,321,184	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.
[30.6] the plurality of commands are received after determining that a user of the remote user computing device is authorized to issue commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user account being accessed from a data store;	The Accused System comprises the plurality of commands are received after determining that a user of the remote user computing device is authorized to issue commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user account being accessed from a data store. <i>See, e.g.:</i> <i>See claim limitation [1.4] above.</i> 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.
[30.7] for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection;	The Accused System comprises for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection. <i>See, e.g.:</i> <i>See claim limitation [1.5] above.</i> The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 12,321,184	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.
[30.8] translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states;	The Accused System comprises translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states. <i>See, e.g.:</i> <i>See claim limitation [1.6] above.</i> 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.
[30.9] sending, with the first computing system, the translated commands to the local controllers;	The Accused System comprises sending, with the first computing system, the translated commands to the local controllers. <i>See, e.g.:</i> <i>See claim limitation [1.7] above.</i> The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 12,321,184	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.
[30.10] obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices;	The Accused System comprises obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices. <i>See, e.g.:</i> <i>See</i> claim limitation [1.8] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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.
[30.11] sending, with the first computing system, the site data stored in the report buffer to a remote second computing system.	The Accused System comprises sending, with the first computing system, the site data stored in the report buffer to a remote second computing system. <i>See, e.g.:</i> <i>See</i> claim limitation [1.9] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and

U.S. Patent No. 12,321,184	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 31	
[31.1] A system, comprising:	Regardless of whether the preamble limits the scope of the claim, the Accused System includes a system. <i>See, e.g.:</i> <i>See</i> claim limitation [30.1] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.2] a fluid-handling site;	The Accused System comprises a fluid-handling site. <i>See, e.g.:</i> <i>See</i> claim limitation [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 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.
[31.3] a plurality of fluid handling devices at the fluid-handling site; and	The Accused System comprises a plurality of fluid handling devices at the fluid-handling site. <i>See, e.g.:</i>

U.S. Patent No. 12,321,184	The Accused System
	See claim limitation [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 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.
[31.4] a first computing system communicatively coupled to the plurality of fluid handling devices, the first computing system storing instructions that, when executed by the first computing system, effectuate operations comprising:	The Accused System comprises a first computing system communicatively coupled to the plurality of fluid handling devices, the first computing system storing instructions that, when executed by the first computing system, effectuate operations comprising. <i>See, e.g.:</i> See claim limitation [30.3] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.5] receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices, wherein. <i>See, e.g.:</i>	The Accused System comprises receiving, with a first computing system, via a network interface, a plurality of commands encoded in a first protocol to control a plurality of different fluid-handling devices at a fluid-handling site, different commands among the plurality of commands being directed to different fluid handling devices among the plurality of fluid-handling devices, wherein. <i>See, e.g.:</i>

U.S. Patent No. 12,321,184	The Accused System
directed to different fluid handling devices among the plurality of fluid-handling devices, wherein:	See claim limitation [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 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.
[31.6] the plurality of commands are responsive to inputs to a command interface presented on a remote user computing device, and	The Accused System comprises the plurality of commands are responsive to inputs to a command interface presented on a remote user computing device, and See claim limitation [1.3] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.7] the plurality of commands are received after determining that a user of the remote user computing device is authorized to issue commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user	The Accused System comprises the plurality of commands are received after determining that a user of the remote user computing device is authorized to issue commands to the first computing system based on a user account that indicates the user is authorized to issue commands to the first computing system, the user account being accessed from a data store. See, e.g.: See claim limitation [1.4] above.

U.S. Patent No. 12,321,184	The Accused System
account being accessed from a data store;	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.
[31.8] for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection;	The Accused System comprises for at least some of the plurality of commands, determining, with the first computing system, a plurality of different target states of a given one of the fluid-handling devices over time, wherein the first computing system is operative to maintain control of the fluid handling devices in an absence of an external network connection. <i>See, e.g.:</i> <i>See claim limitation [1.5] above.</i> 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.
[31.9] translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being	The Accused System comprises translating, with the first computing system, the plurality of commands into translated commands encoded in a plurality of protocols different from the first protocol, at least some of the translated commands being operative to cause a local controller of the given fluid-handling device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being

U.S. Patent No. 12,321,184	The Accused System
device to the plurality of different target states, and the local controller being responsive to the at least some of the translated commands and feedback from the given fluid-handling device, the feedback being indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states;	indicative of whether the given fluid-handling device is in targeted states among the plurality of different target states. <i>See, e.g.:</i> <i>See</i> claim limitation [1.6] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.10] sending, with the first computing system, the translated commands to the local controllers;	The Accused System comprises sending, with the first computing system, the translated commands to the local controllers. <i>See, e.g.:</i> <i>See</i> claim limitation [1.7] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.11] obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the first computing system such that the site data in the report buffer is not lost in the absence of the network	The Accused System comprises obtaining, with the first computing system, site data and storing the site data in a report buffer of the first computing system such that the site data in the report buffer is not lost in the absence of the network connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-

U.S. Patent No. 12,321,184	The Accused System
connection, the site data including alarms, measurements from sensors, or other data associated with the fluid-handling site or associated with at least some of the plurality of fluid-handling devices;	handling site or associated with at least some of the plurality of fluid-handling devices. <i>See, e.g.:</i> <i>See</i> claim limitation [1.8] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused 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.
[31.12] sending, with the first computing system, the site data stored in the report buffer to a remote command center server, wherein:	The Accused System comprises sending, with the first computing system, the site data stored in the report buffer to a remote command center server, wherein. <i>See, e.g.:</i> <i>See</i> claim limitations [1.9] and [21.2] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.13] other user accounts in the data store indicate other users are not authorized to issue commands to the first computing system;	The Accused System comprises other user accounts in the data store indicate other users are not authorized to issue commands to the first computing system. <i>See, e.g.:</i> <i>See</i> claim limitation [2.1] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a

U.S. Patent No. 12,321,184	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.
[31.14] the other user accounts indicate the other users are authorized to view reports from the first computing system;	The Accused System comprises the other user accounts indicate the other users are authorized to view reports from the first computing system. <i>See, e.g.:</i> <i>See claim limitation [2.2] above.</i> 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.
[31.15] the site data stored in the report buffer comprises a sensor measurement of the fluid handling site and an alarm;	The Accused System comprises the site data stored in the report buffer comprises a sensor measurement of the fluid handling site and an alarm. <i>See, e.g.:</i> <i>See claim limitation [1.8] above.</i> 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. 12,321,184	The Accused System
[31.16] the site data is obtained while network access to the remote command center server is intermittently ceased, and wherein sending the site data occurs after network access to the remote command center server is intermittently ceased;	The Accused System comprises the site data is obtained while network access to the remote command center server is intermittently ceased, and wherein sending the site data occurs after network access to the remote command center server is intermittently ceased. <i>See, e.g.:</i> <i>See</i> claim [9] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.17] translating abstracts details of site-specific implementation of the first computing system;	The Accused System comprises translating abstracts details of site-specific implementation of the first computing system. <i>See, e.g.:</i> <i>See</i> claim [20] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.18] a given command among the plurality of commands is configured to instruct the given fluid-handling device	The Accused System comprises a given command among the plurality of commands is configured to instruct the given fluid-handling device to adjust to attain another target state. <i>See, e.g.:</i>

U.S. Patent No. 12,321,184	The Accused System
to adjust to attain another target state; and	See claim limitation [24.1] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.19] the operations further comprise: translating the given command to produce another translated command and sending the other translated command to the given fluid-handling device;	The Accused System comprises the operations further comprise: translating the given command to produce another translated command and sending the other translated command to the given fluid-handling device. <i>See, e.g.:</i> See claim limitation [24.2] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.
[31.20] obtaining sensor data characterizing a response of the given fluid-handling device to the other translated command; and	The Accused System comprises obtaining sensor data characterizing a response of the given fluid-handling device to the other translated command. <i>See, e.g.:</i> See claim limitations [23.3] and [24.3] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the

U.S. Patent No. 12,321,184	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.
[31.21] determining, by the first computing system, to send a further command to the given fluid-handling device to make a further adjustment based on the sensor data characterizing the response.	The Accused System comprises determining, by the first computing system, to send a further command to the given fluid-handling device to make a further adjustment based on the sensor data characterizing the response. <i>See, e.g.:</i> <i>See</i> claim limitations [23.4] and [24.4] above. The Accused System satisfies the limitations of this claim element both literally and/or under the doctrine of equivalents because each of the Accused Systems operates in a manner that satisfies both the substantially-same-function/way/result test and the insubstantial-differences test. These references are exemplary and based on SitePro's current understanding of the Accused System. As discovery has yet to commence and source code has not yet been made available for inspection, SitePro reserves the right to amend this analysis as additional information becomes available.