

EXHIBIT C

Attachment B for US Patent No. 7,031,724 Against Lyft Accused Products

Based on information presently available,¹ Defendant AGIS Software Development LLC (“AGIS Software”) is the Plaintiff Lyft Technologies Inc. (“Lyft” or “Plaintiff”) infringes claims 9, 12-16 (the “Asserted Claims”) of U.S. Patent No. 7,031,724 (the “724 Patent”) through the Accused Products, Services which are manufactured, sold, offered for sale, and/or used.

The Accused Products comprise the Lyft and Lyft Driver applications, servers, and services manufactured by Lyft Technologies Inc. during and after 2016. AGIS Software reserves the right to seek leave of court to amend this list of Accused Products upon filing of an amended complaint or as discovery progresses.

Lyft directly infringes each of the Asserted Claims by making, using, importing, testing, distributing, selling, offering for sale the Accused Products in violation of 35 U.S.C. § 271(a).

Lyft indirectly infringes the Asserted Claims in violation of 35 U.S.C. § 271(b) by inducing third parties, including its employees and/or customers, to directly infringe through their operation and use of the Accused Products. Lyft has knowingly induced this direct infringement by, *inter alia*, (i) selling, importing, or otherwise providing the Accused Products to third parties with the intent that the Accused Products will be operated and used in a manner that practices the Asserted Claims; (ii) advertising the Accused Products. Lyft’s marketing and promotional materials for the Accused Products are found on Lyft’s website, and in App stores of operating systems for which the Accused Products are made available. For example, Lyft offers customers instructions and/or manuals for the Accused Products that instruct customers to, among other things, use the services in the Accused Products. Lyft’s website also offers support to customers, including instruction to, among other things, use the Accused Products share location information with a group of users. Lyft knows, or should have known, that its actions constitute infringement of the Asserted Claims, or subjectively believes that there is a high probability that its actions will constitute infringement of the Asserted Claims but has taken deliberate actions to avoid learning these facts.

Lyft also contributorily infringes each of the Asserted Claims in violation of 35 U.S.C. § 271(c) by selling, offering for sale, and otherwise providing the Accused Products, which when used directly infringe the Asserted Claims. These actions constitute a material part of the Asserted Claims.

¹ There is no operative complaint asserting non-infringement of any patent claim in this action at this time. AGIS Software reserves the right to update its contentions upon receipt of any future amended complaint.

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The following chart identifies specifically where each limitation of each Asserted Claim is found within and in particular, the corresponding elements that meet the limitations in the Lyft and Lyft Driver applications. On information and belief, each charted version of the Lyft Rider and Driver Apps are representative of all ve Products, including all variants of the Accused Products made, sold, offered for sale, or used on any version of operating systems.

AGIS Software does not concede that any claims of the '724 Patent that are not listed below are not infr Accused Products. Moreover, the citations to certain documents and other information below are intended to be no way foreclose AGIS from citing or relying on additional documents, information, source code, and/or testimony. contentions are preliminary in nature and an analysis of Lyft's products, internal documentation, source code, relevant witnesses may more fully and accurately describe the infringing features of its accused products. Accord reserves the right to seek leave of court to supplement, correct, modify, and/or amend these contentions once such is made available to AGIS Software. Furthermore, AGIS Software reserves the right to seek leave of court to modify, and/or amend these contentions as discovery in this case progresses; in view of the Court's claim construction of any positions taken by Lyft, including but not limited to positions on claim construction, invalidity, and/or no connection with the preparation and exchange of expert reports.

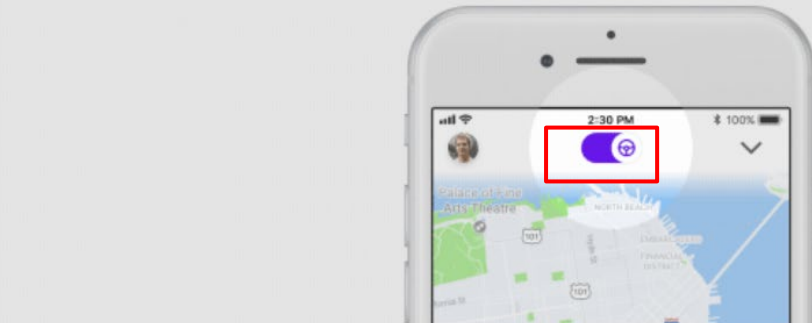
The contents of each claim cell below on which another claim cell depends are expressly incorporated into the dependent cell, as if set forth in their entirety therein.

² The construction of claim terms herein is consistent with the constructions in *AGIS Software Dev. LLC v. Huawei*, No. 2:17-cv-00513-JRG, Dkt. 205 (E.D. Tex. Oct. 10, 2018); *AGIS Software Dev. LLC v. Google LLC*, No. 2:19-cv-00147 (E.D. Tex. Dec. 8, 2020); *AGIS Software Dev. LLC v. T-Mobile USA, Inc., et al.*, No. 2:21-cv-00072-JRG, Dkt. 1 (E.D. Tex. Nov. 10, 2021). AGIS Software reserves the right to update its constructions and contentions in view of this Court's claim construction order.

Attachment B for US Patent No. 7,630,724 Against Lyft Accused Products

Claim – 7,630,724	Accused Products
<p>9[P]. A method for providing a cellular phone communication network for designated participating users, each user having a similarly equipped cellular phone that includes a CPU, GPS navigational system, an interact message transmitter and receiver and a touch screen display comprising:</p>	<p>The Lyft Accused Products perform a computer implemented method as set forth infringes directly and/or indirectly by performing, inducing others to perform, and/or performance of: a method for providing a cellular phone communication network for participating users, each user having a similarly equipped cellular phone that includes a CPU, GPS navigational system, an interact message transmitter and receiver and a touch screen display comprising:</p> <p>For example, Lyft provides Lyft app for passengers and Lyft Driver app for drivers. Lyft app for passengers and Lyft Driver app for drivers, in conjunction with Lyft’s servers and services, provide users with the ability to request, view, and track locations of passengers/riders using real-time maps and other data. Lyft server(s) and their services communicate with the Lyft apps for riders and drivers and their services host information related to and instructions for processing user accounts, location data, and map data. The claimed methods are distributed by Lyft. The claimed methods are used/tested by Lyft using the Lyft apps. The claimed methods are installed by Lyft’s customers (riders) and personnel (drivers, Lyft personnel) in the direction/encouragement of Lyft and used by Lyft’s customers and Lyft’s personnel. Each of the driver and the passenger’s mobile phones which are installed with the Lyft apps comprises a CPU, GPS, a navigational system symbol generator (Lyft App and Lyft Driver App) and a touch screen display. The Lyft and Lyft Driver application is supported by smartphones but not limited to smartphones and tablets, which have an antenna in them for both transmission and reception.</p> <h2>Lyft Driver app</h2> <div style="border: 1px solid red; padding: 5px;"> <p>We’ve separated the passenger and driver experiences into two separate mobile apps — one for passengers (named the Lyft app) and the other exclusively for drivers (named the Lyft Driver app).</p> </div> <p>The Lyft Driver app will eventually be standard for all drivers and required for driving. At this time, we’ll keep using the Lyft app to give rides. Don’t worry! While we have some planned improvements to the Lyft Driver app, we’ve kept its features the same.</p>

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Claim – 7,630,724	Accused Products
	<p data-bbox="581 745 1469 781">https://help.lyft.com/hc/en-ca/articles/115013079208-Lyft-Driver-app</p> <h2 data-bbox="587 829 885 882">What is Lyft?</h2> <p data-bbox="587 934 1624 1003">Lyft is a platform that connects drivers with individuals and organizations that need rides.</p> <p data-bbox="581 1033 1047 1066">https://www.lyft.com/drive-with-lyft</p>  <p data-bbox="581 1495 698 1528">Go online</p> <p data-bbox="581 1558 1624 1669">Open your Lyft Driver app and tap the steering wheel icon. Lyft will now find the closest to your location requesting a ride. Turn on some music and get comfortable: that first ride may come quickly or may take a while, depending on the number of current passengers.</p> <p data-bbox="581 1675 1234 1711">https://www.lyft.com/hub/posts/how-to-give-a-ride</p>

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