

# Exhibit C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

EMERSON ELECTRIC CO., FISHER-  
ROSEMOUNT SYSTEMS, INC., and  
ROSEMOUNT INC.,

Plaintiffs,

v.

SIPCO LLC, and  
IP CO., LLC (d/b/a INTUS IQ)

Defendants.

Civil Action No. 1:15-cv-00319-AT

**PLAINTIFFS' FIRST SET OF JOINT INVALIDITY  
CONTENTIONS**

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## **I. INTRODUCTION**

Pursuant to Patent L.R. 4.3 of the United States District Court for the Northern District of Georgia and the Court's Scheduling Order (Dkt. 25), Declaratory Judgement Plaintiffs Emerson Electric Co., Fisher-Rosemount Systems, Inc. and Rosemount Inc. (collectively "Emerson" or "Plaintiffs") submit the following Joint Invalidity Contentions. In its complaint, Emerson has asserted that (i) claim 1 of U.S. Patent No. 7,103,511 ("the '511 Patent"); and (ii) claim 2 of U.S. Patent No. 6,044,062 ("the '062 Patent"), which are collectively referred to as "the Initially Asserted Claims" of the "Asserted Patents." In accordance with Patent L.R. 4.3(a)(1)–(4), Plaintiffs hereby: (a) identify each item of prior art that allegedly anticipates each Asserted Claim or renders it obvious; (b) specify whether each such item of prior art anticipates each Asserted Claim or renders it obvious; (c) submit charts identifying where specifically in each alleged item of prior art each limitation of each asserted claim is found; and (d) identify any grounds of invalidity based on 35 U.S.C. § 112 of any of the Asserted Claims. Plaintiffs also identify any grounds of invalidity based on 35 U.S.C. § 101.

## **II. RESERVATIONS**

The initial contentions provided herein by Plaintiffs are provisional and subject to revision as provided in the Local Rules, the Federal Rules of Civil Procedure, and/or any Order of this Court. For example, these Joint Invalidity

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