

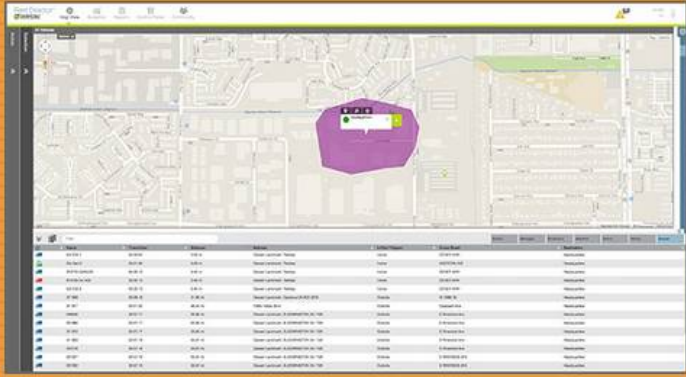
PerdiemCo, LLC v. Teletrac, Inc. and Navman Wireless North America Ltd.
EXHIBIT C TO PERDIEM'S PRELIMINARY INFRINGEMENT CONTENTIONS (9/16

U.S. Pat. No. 8,717,166	Accused Instrumentalities ¹
<p>[1A] A method for conveying information related to locations of a plurality of mobile devices of users in a plurality of user groups, comprising:</p>	<p>Defendant makes, uses, sells, offers to sell, and/or imports the Accused Instrumentality. PerDiem contends that Defendant directly infringes this claim because it makes, uses, sells, offers to sell, and/or imports the Accused Instrumentalities, which include and/or practice each and every element of this claim. In addition, or alternatively, PerDiem contends that Defendant and additional parties conspired in an enterprise to directly infringe this claim because they make, use, sell, offers to sell, and/or import the Accused Instrumentalities, which include and/or practice each and every element of this claim. See, e.g., <i>Limelight Networks, Inc.</i>, No. 2009-1372, 2015 WL 4760450, at *3 (Fed. Cir. 4/16/15).</p> <p>Additionally, Defendant indirectly infringes this claim by (1) inducing, with knowledge, the use of the Accused Instrumentality by customers' (e.g., fleet managers, asset managers, or other customers) use of the Accused Instrumentality to practice each and every one of the following claim elements with knowledge that such use would infringe this claim and intent to cause such infringement (as evidenced for example, in instructions to Defendant such as instructions to operate the Accused Instrumentality); and/or (2) causing, with knowledge, infringement by customers (e.g., fleet managers, asset managers, or other customers) to practice each and every one of the following claim elements, where such customers' use of the Instrumentality to practice each and every one of the following claim elements, without the infringing components of the Accused Instrumentalities have no substantial non-infringing combination for which such components were made infringes the claim.</p> <p>They are capable of tracking and notifying a supervisor or manager of an employee.</p>






¹ Discovery in this case has not yet begun. Accordingly, PerDiem expects that these contentions may be subject to amendment after further discovery and disclosure of Defendant's non-infringement positions in order to focus the issues. PerDiem may supplement these contentions in response to information learned during discovery to rebut allegations of non-infringement doctrine of equivalents. Additionally, PerDiem expects that these contentions may be subject to amendment or supplementation to accuse additional products and services released, developed, or made available after the date on which these contentions were filed.

² The Accused Instrumentalities include all products and services that convey information for fleets of vehicles, including but not limited to Teletrac's Solutions, Teletrac's Fleet Director, Teletrac's GPS Fleet Tracking, Navman Wireless Fleet Tracking Solutions, and Navman Wireless Online AVL2, Navman Wireless Drive, Navman Wireless DIRECTOR, Navman Wireless Intelligence, Navman Wireless Software Plans (including Essential, Fleet+, and Complete); and all related or similar hardware and software.

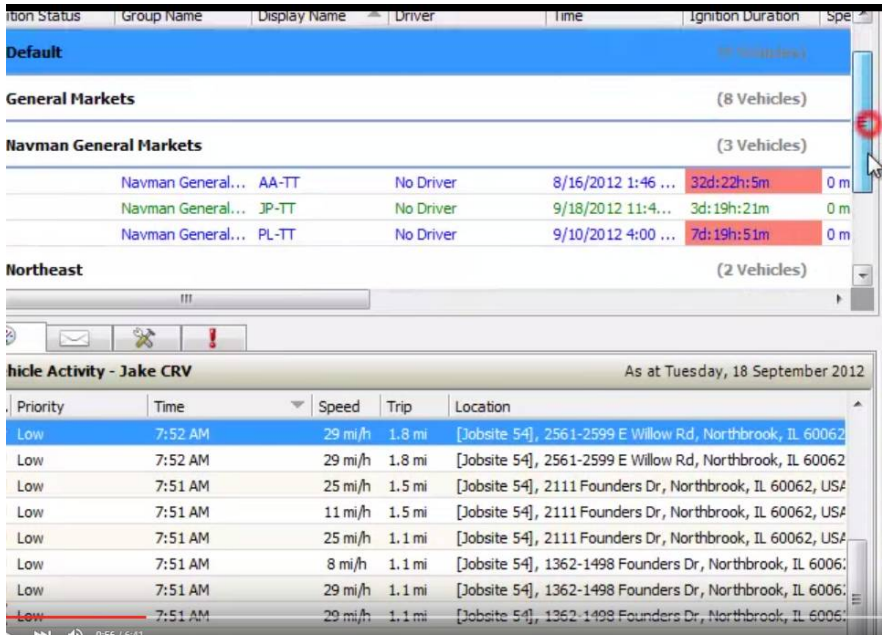
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	<p>also include valuable features, such as “smart geofencing capabilities” and “monit homes and customer sites.”</p> <div data-bbox="581 869 1624 1461" style="background-color: #f4a460; padding: 10px;"> <h2 align="center">Custom Geo-Fences for Accurate Locations</h2>  <p>Tracking your fleet as it t and other key locations i fences help your busines specific geographical are they're moved from thos during the work day or a With smart geo-fencing in control of your fleet.</p> </div> <p>See http://www.teletrac.com/fleet-management-software/gps-mapping/polygon-l</p>

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	<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%;">  <p>Maintenance Keep assets on the road by reviewing past repair and proactively scheduling preventive care</p> </div> <div style="width: 50%;">  <p>Idle Note where and when idling occurs so you can optimize for greater efficiency</p> </div> <div style="width: 50%;">  <p>Customer Site Record when drivers arrive and depart defined customer locations</p> </div> <div style="width: 50%;">  <p>Geofences Help cut down on fuel waste by monitoring zones around homes and customer locations</p> </div> <div style="width: 50%;">  <p>Replay-a-Day Get a full look at the activity performed by an asset in a 24-hour period</p> </div> </div> <p>https://www.navmanwireless.com/why-us/benefits/increase-productivity/</p> <p>Companies can organize their vehicles or other assets into groups such as “enhanced fleets.”</p>

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	 <p>The screenshot displays a vehicle tracking dashboard. At the top, there are tabs for 'Default', 'General Markets', 'Navman General Markets', and 'Northeast'. Below these, a table lists vehicles with columns for Group Name, Display Name, Driver, Time, Ignition Duration, and Speed. The 'Navman General Markets' section shows three vehicles: AA-TT, JP-TT, and PL-TT, all with 'No Driver' and various trip times. Below this is a section for 'Vehicle Activity - Jake CRV' as of Tuesday, 18 September 2012. This section contains a table with columns for Priority, Time, Speed, Trip, and Location, showing several trips starting at 7:51 AM and 7:52 AM from various 'Jobsite 54' locations in Northbrook, IL.</p> <p>https://www.youtube.com/watch?v=VpY-kCqsgOI</p>

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	<div data-bbox="646 781 1239 856"> <p>Set Up Drivers, Landmarks, Alerts, Service Data and More—All from One Control</p> </div> <div data-bbox="646 863 1255 1050"> <p>The Control Panel in Fleet Director is where users can easily add, edit or make changes to administrative functions within the software. Users can select from a wide variety of actions to help customize how they—and others in their team—monitor and track their vehicles on the live map, receive relevant data and share it with others.</p> </div> <div data-bbox="646 1062 1245 1308"> <p>This easy-to-navigate feature lets users control a variety of items, including the ability to assign drivers to specific sub-groups, group vehicles into sub-fleets for easy search, or set up alerts for exception conditions or vehicle messages—such as when an engine is on or in sleep mode. Users can also create vehicle statuses, landmarks and watchlists, track vehicle maintenance and more, as well as add additional user accounts and access controls for multiple administrators.</p> </div> <div data-bbox="1344 785 1620 1213"> </div> <div data-bbox="1344 1239 1624 1308"> <p><i>The Control Panel is easy to use for a exceptions and alerts to adding color the map.</i></p> </div> <div data-bbox="574 1350 1624 1421"> <p>http://www.teletrac.com/teletrac/content/orphan-pages/10282014-fleet-director-sc 42.</p> </div>

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