

EXHIBIT C

EXHIBIT C – Plaintiff AGIS Software Development LLC’s Proposed Constructions to Defendants Uber Technologies Inc., d/b/a Uber and Lyft, Inc.

No.	Claim Term/Phrase	Patent/Claims	AGIS’s Proposed Construction	Additional Intrinsic Evidence	
1.	a forced message alert software application program / a forced message alert software application	'970:1, 2, 10, 11, 12	“application software that allows an operator to create and transmit message alerts”	'970 Patent at Abstract; 3:29-40; 3:41-51; 4:47-59; 7:8-42; 7:43-8:15; 8:16-52; 8:65-9:39; 10:7-41	AGIS S Huawe No. 2:1 205 (E and all filings. AGIS r testimo McAle with th
2.	manual response	'970:2	“recipient-selectable response message”	'970 Patent at Abstract; 1:15-23; 2:7-59; 7:43-8:15; 8:16-52; 8:65-9:39; 10:7-41	AGIS S Huawe No. 2:1 205 (E and all filings. AGIS r testimo McAle with th
3.	a data transmission means that facilitates the transmission of electronic files between said PDA/cell phones in different locations	'970:1	Governed by § 112, ¶ 6. Function: “facilitating the transmission of electronic files between said	'970 Patent at 1:39-43; 2:36-48; 3:52-67; 4:1-36; 7:43-8:15; Figs. 1, 2, 3A, 3B, and 4; Claims 1-13	AGIS S Huawe No. 2:1 205 (E AGIS S Google 00361- Dec. 8, briefing

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			PDA/cell phones in different locations” Structure: communications network server; and equivalents thereof”		AGIS r testimo McAle with th
4.	means for allowing a manual response to be manually selected from the response list or manually recorded and transmitting said manual response to the sender PDA/cell phone	’970:2	Governed by 112, ¶ 6. Function: “allowing a manual response to be manually selected from the response list or manually recorded and transmitting said manual response to the sender PDA/cell phone” Structure: “PDA/cell phone configured to implement the algorithm disclosed in the ’970 patent at 7:43-63, 8:9-57; and equivalents thereof”	’970 Patent at 1:19-23; 1:51-67; 2:7-34; 2:49-55; 8:9-51; Figs. 3A, 3B, 4.	AGIS S Google 00361- Dec. 8, briefing AGIS r testimo McAle with th
5.	similarly equipped PDA/cell phone	’970:1	Plain and ordinary meaning	’724 Patent at 2:48-3:28; 4:24-7:47; 11:16-35; 11:39-58; 15:50-16:10;	AGIS r testimo

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				Figs. 1, 2, 3; Claims 1, 3, 9, 16. ’728 Patent at 3:44-56; 3:62-6:33; 7:17-60; 10:40-61; Figs. 1, 2. ’970 Patent at 3:22-40; 4:12-27; 7:8-16; Figs. 1a, 1b.	McAle with th
6.	required response list	’970:10	Plain and ordinary meaning	’970 Patent at Abstract, Figs. 2, 3A, 3B, 4, 2:7-35; 2:49-55; 3:22-28; 7:8-42; 7:43-8:15; 8:16-57; Claims 1-13.	AGIS S Google 00361- Dec. 8, briefing AGIS r testimo McAle with th
7.	transmitting a selected required response from the response list in order to allow the message required response list to be clear from the recipient’s cell phone display	’970:10	Plain and ordinary meaning	’970 Patent at 7:17-31; 8:37-57; Fig. 4.	AGIS r testimo McAle with th
8.	each PDA/cell phone within a predetermined	’970:11	Plain and ordinary meaning	’724 Patent at 2:48-3:28; 4:24-7:47; 11:16-35; 11:39-58; 15:50-16:10;	AGIS r testimo

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	communication network is similarly equipped			Figs. 1, 2, 3; Claims 1, 3, 9, 16. '728 Patent at 3:44-56; 3:62-6:33; 7:17-60; 10:40-61; Figs. 1, 2. '970 Patent at 3:22-40; 4:12-27; 7:8-16; Figs. 1a, 1b.	McAle with th
9.	[a] method of receiving, acknowledging, and responding to a forced message alert from a sender PDA/cell phone to a recipient PDA/cell phone	'970:10	Preamble is not limiting.	'970 Patent at Abstract, Figs. 1, 2, 3A, 3B, 4; 2:3-35; 2:49-55; 3:22-40; 4:12-7:7; 7:8-42; 7:43-8:15; 8:16-57; Claims 1-13.	
10.	SMS / short message service (SMS) messages	'724:9 '055: 3, 12, 31 '251: 7, 30	“cellular based messages of limited size consisting of text and numbers”	'838 Patent at 5:50-61; 9:40-46; 13:61-67 '728 Patent at 1:36-44; 5:55-64; 6:7-19; 6:34-36; 7:41-45. '724 Patent at Abstract; 1:39-42; 3:29-31; 4:52-65; 9:6-22; 9:31-47; 12:12-62; 13:31-45; Figs. 4, 6.	AGIS S Huawe No. 2:1 205 (E. AGIS S Google 00361- Dec. 8, briefing

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