

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner

v.

BLITZSAFE TEXAS, LLC
Patent Owner

IPR2016-00118
Patent 8,155,342
Multimedia Device Integration System

PROPOSED STIPULATION

Unified Patents Inc. (“Unified”) proffers this Proposed Stipulation, as suggested by the Board, to obviate the need to make reference to and thus the need to include and redact otherwise confidential produced exhibits. *See* Order, Conduct of the Proceeding, *Unified Patents Inc. v. Blitzsafe Texas LLC*, IPR2016-00118, Paper 16 (PTAB Mar. 15, 2016). As noted, Unified has agreed that the patent owner’s preliminary response no longer needs to be redacted.¹ Unified, having previously proffered this stipulation to Patent Owner, proposes to stipulate to the following:

1. Unified has produced 27 membership agreements, one for each of the members of the Automotive Zone as of the date of filing.
2. Unified has produced the 23 agreements for Pledge members (*see* <http://unifiedpatents.com/#membership>) in the Automotive Zone as of the date of filing; Pledge members receive membership without paying fees and compensate Unified by, among other things, agreeing to give Unified notice rights and license rights to their patent portfolios.

¹ Unified regrets the inconvenience, noting that at the time the response was filed, the identities of two members were confidential. Those entities have since consented to become public members, and so there is no longer any need to redact any portion of the response.

3. Unified has produced the 4 agreements for Enterprise members (*see* <http://unifiedpatents.com/#membership>) in the Automotive Zone signed as of the date of filing; Toyota Motor Corporation, Honda Patents & Technologies North America LLC, Nissan Motor Co., Ltd., and DENSO Corporation are the only members to have paid subscription fees to the Automotive Zone as of the date of filing.
4. Unified is funding IPR2016-00118 from the Automotive Zone.
5. No subscription fees paid by a member with respect to one zone are used by Unified for other zones. If a patent involves more than one zone, any acquisition, licensing, or other costs (including any sale proceeds) for that patent are equally allocated amongst the zones.
6. Unified seeks to reduce NPE litigation in each zone by, for example: acquiring rights necessary to grant members licenses, sublicenses, releases, and other rights; acquiring rights necessary to participate in bids or auctions, or otherwise to participate in acquisition, with respect to the sale of patents (including acquiring rights-of-first-offer or rights-of-first-refusal for patents in a zone from small businesses in exchange for reduced or free membership); filing and conducting reexaminations and review proceedings on patents in a zone before the U.S. Patent and Trademark Office; conducting prior art searches for patents in the zone; providing members

with opinions of counsel regarding the patentability of patents in the zone; providing members and other parties in the zone with information relating to non-practicing entity (NPE) business practices, NPE litigation trends, NPE market data and statistics, and other information with respect to NPEs; participating in legislative and judicial reform initiatives on patent law (including, but not limited to, filing or joining amicus briefs and/or providing data to governmental agencies and/or legislators); and providing additional related services.

7. For each zone, among other things, Unified: analyzes issued patents and published applications in each zone; monitors patents, published applications, assignment records, and patent owners in each zone for NPE activity; monitors patent owners in each zone for performance and other market data; provides members with an annual report on the NPE activity in their zones, including information derived from Unified's activities; and performs other additional services.
8. Unified provides members with an annual report that includes the following information: a list of all licensed patents and rights acquired; the amount spent for the assets and rights acquired, the date of each acquisition, and the identity of sellers; a list of all proceedings and the amount spent for each proceeding; estimated administrative and other costs; and a list of all zone

patents sold, the amount received for each, the date of the sales, and the identity of the purchasers.

Dated: March 15, 2016

Respectfully submitted,

By: /Paul C. Haughey/
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Lead Counsel for Petitioners

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