

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HYUNDAI MOTOR COMPANY LTD., HYUNDAI MOTOR AMERICA,  
HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC, KIA MOTORS  
CORPORATION, KIA MOTORS AMERICA, INC.,

KIA MOTORS MANUFACTURING GEORGIA, INC., NISSAN NORTH  
AMERICA, INC., NISSAN MOTOR CO., LTD., and AMERICAN HONDA  
MOTOR CO., INC.,

Petitioner,

v.

BLITZSAFE TEXAS, LLC,

Patent Owner.

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Case IPR2016-00418<sup>1</sup>

Patent 8,155,342 B2

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**NISSAN MOTOR CO., LTD. AND NISSAN NORTH AMERICA, INC.'S  
UPDATED MANDATORY NOTICE UNDER 37 C.F.R. § 42.8**

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<sup>1</sup> Cases IPR2016-01533, IPR2016-01557, and IPR2016-01560 have been joined with this proceeding.

In accordance with 37 CFR § 42.8(b), Petitioners Nissan North America, Inc. (“NNA”) and Nissan Motor Co., Ltd. (“NML”) (collectively “Petitioners”) hereby submit the following updated Mandatory Notices, to update the Mandatory Notices filed with the Petition (IPR2016-01560, Paper 3).

**A. REAL PARTY-IN-INTEREST UNDER 37 C.F.R. § 42.8(b)(1)**

Nissan North America, Inc. (“NNA”) and Nissan Motor Co., Ltd. (“NML”) (collectively “Petitioners”) are the real parties-in-interest.

**B. RELATED MATTERS UNDER 37 C.F.R. § 42.8(b)(2)**

The ’342 patent is subject to the following pending actions: *Blitzsafe Texas, LLC v. Nissan Motor Co., Ltd. et al.*, 2:15-cv-01276, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Toyota Motor Corp. et al.*, 2:15-cv-01277, July 16, 2015 (E.D. Tex.); *Blitzsafe Texas, LLC v. Volkswagen Group of Am., Inc. et al.*, 2:15-cv-01278, July 16, 2015 (E.D. Tex.); *Blitzsafe Texas, LLC v. Hyundai Motor Co. et al.*, 2:15-cv-01275, July 16, 2015 (E.D. Tex.); *Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.*, 2:15-cv-01274, July 16, 2015 (E.D. Tex.); IPR2016-00118, IPR2016-00418 and IPR2016-00419.

U.S. Patent No. 7,489,786 (the “’786 patent”), a parent patent to the ’342 patent, is also at issue in the above-listed district court cases, and was previously the subject of the following litigations: *Marlowe Patent Holdings LLC v. DICE Electronics, LLC et al.*, 3:10-cv-01199 (D. N.J.); and *Marlowe Patent Holdings LLC*

*v. Ford Motor Company*, 3:10-cv-07044 (D. N.J.). Both of these cases settled by June 2015. In addition, claims of the '786 patent are presently undergoing inter partes review in Case No. IPR2015-00421.

### **C. LEAD AND BACK-UP COUNSEL**

Lead counsel is David L. Tarnoff, Reg. No. 32,383, of Global IP Counselors, LLP, 1233 Twentieth St., NW, Suite 600; Washington, DC 20036; dtarnoff@giplaw.com, 202-292-2209 (phone), 202-293-0445 (fax). Back-Up Counsel is Sean N. Hsu, Reg. No. 69,477, of Janik Vinnakota LLP, 8111 LBJ Freeway, Suite 790; Dallas, TX 75251; shsu@jvllp.com, 214-888-0219 (phone), 214-586-0680 (fax); Michael T. Murphy of Global IP Counselors, LLP, 1233 Twentieth St., NW, Suite 600; Washington, DC 20036; MMurphy@giplaw.com, 202-293-0585 (phone), 202-293-0445 (fax); and Suzanne E. Konrad of Global IP Counselors, LLP, 1233 Twentieth St., NW, Suite 600; Washington, DC 20036; SKonrad@giplaw.com, 202-795-4068 (phone), 202-293-0445 (fax). A motion for admission *pro hac vice* in this proceeding will be filed for Mr. Murphy upon authorization from the Board.

### **D. SERVICE INFORMATION**

Service information for Lead and Back-Up Counsel is provided in the designation of Lead and Back-Up Counsel above.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached PETITIONERS' UPDATED MANDATORY NOTICE UNDER 37 C.F.R. § 42.8 was served on January 31, 2017 upon the following parties via Express delivery:

Ira M. Marlowe  
BLITZSAFE OF AMERICA, INC.  
33 Honeck Street Englewood, NJ 07631

Courtesy Copies of the attached UPDATED MANDATORY NOTICE were also served via e-mail to the following parties:

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Dated: January 31, 2017

/David L. Tarnoff/  
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