

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION, 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

Patent No. 8,155,342

Issue Date: April 10, 2012

Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

**TOYOTA MOTOR CORPORATION AND BLITZSAFE TEXAS, LLC'S
JOINT MOTION TO TERMINATE PROCEEDING PURSUANT TO 35
U.S.C. § 317 AND 37 C.F.R. § 42.74**

Case No. IPR2016-00418¹

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

Pursuant to 35 U.S.C. § 317, 37 C.F.R. § 42.74, and the email from the Patent Trial and Appeal Board on January 30, 2017, authorizing filing of the present motion, Petitioner Toyota Motor Corporation and Patent Owner Blitzsafe Texas, LLC (the “Parties”) jointly request termination of the *inter partes* review of U.S. Patent No. 8,155,342, Case No. IPR2016-00418, without prejudice to either Party.

1. Termination as to the Patent Owner and Petitioner is Appropriate

The Parties have settled their dispute and have agreed to request termination of this *inter partes* review proceeding. More specifically, the Parties have settled and dismissed their related district court litigation (Blitzsafe Texas, LLC v. Toyota Motor Corporation *et al.*, Civ. A. No. 2:15-cv-01277-JRG-RSP (E.D. Tex.) (Motion to dismiss to be filed concurrently with this motion)) and have also agreed to jointly request termination of this proceeding and related *inter partes* review of U.S. Patent No. 7,489,786, Case No. IPR2016-00421.

Toyota was the original filer of IPR2016-00418, and joinder was granted as to the Honda entities (IPR2016-01533); the Hyundai/Kia entities (IPR2016-01557); and the Nissan entities (IPR2016-01560). Each of Honda, Hyundai, and Nissan have also submitted joint requests with Patent Owner to terminate their respective proceedings, and the Board authorized the filing of those motions on February 8, 2017, January 31, 2017, and February 2, 2017. Patent Owner expects

that each of those motions to terminate will be filed within the coming days.

2. Treatment of Settlement Agreement as Business Confidential Information

Pursuant to 37 C.F.R. § 42.74(c), the Parties' settlement agreement has been made in writing and a true and correct copy of the settlement agreement is being filed concurrently with the present motion as Exhibit 2013.

The Parties hereby jointly request that the settlement agreement be treated as business confidential information and be kept separate from the files of the above captioned IPR pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

3. Conclusion

For the foregoing reasons, the Parties jointly and respectfully request termination of the present proceeding, Case No. IPR2016-00418, without prejudice to either Party.

Dated February 16, 2017

/s/Peter Lambrianakos /

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EXHIBIT LIST

Exhibit	Description
2014	Settlement and License Agreement (Blitzsafe - Toyota)

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6(e)(4) & 42.105(b)

A copy of Toyota Motor Corporation and Blitzsafe Texas, LLC's Joint Motion to Terminate Proceeding Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74 and Exhibit 2014 on Petitioner at the correspondence of the Petitioner as follows:

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February 16, 2017

By: /s/ Peter Lambrianakos/

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