

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

**AMERICAN HONDA MOTOR CO., INC. 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 February 8, 2017, authorizing filing of the present motion, Petitioner American Honda Motor Co., Inc., 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 their related district court litigation and have filed an agreed motion to dismiss the litigation (Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. *et al.*, Civ. A. No. 2:15-cv-01274-JRG-RSP (E.D. Tex.) (Motion to dismiss to be filed concurrently with this motion)).

Toyota was the original filer of IPR2016-00418, and joinder was granted as to American Honda Motor Co., Inc. (IPR2016-01533); the Hyundai/Kia entities (IPR2016-01557); and the Nissan entities (IPR2016-01560). Toyota and Hyundai/Kia have already filed joint motions with Blitzsafe to Terminate the proceeding (Paper Nos. 38 and 40 respectively). The Board granted Termination as to Toyota and as to Hyundai/Kia in Paper Nos. 42 and 43 respectively. Nissan submitted a joint request with Patent Owner to terminate the proceeding and the

Board authorized the filing of that motion on February 2, 2017. Nissan further indicated in an email to the Board that it would file its motion to Terminate by March 10, 2017. Patent Owner expects that Nissan will file its motion to terminate within the coming days, at which point Patent Owner seeks termination of the proceeding.

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 2016.

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 March 2, 2017

/s/Peter Lambrianakos /

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Admitted Pro Hac Vice
Backup Counsel for Patent Owner

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EXHIBIT LIST

Exhibit	Description
2016	Settlement Agreement (Blitzsafe - Honda)

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

A copy of American Honda Motor Co., Inc. 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 2016 were served on Petitioner at the correspondence of the
Petitioner as follows:

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