

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 TREAT SETTLEMENT AGREEMENT AS
BUSINESS CONFIDENTIAL INFORMATION 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(b), 37 C.F.R. § 42.74(c), and the email from the Patent and 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 to file the settlement agreement between the parties – as referenced in the Joint Motion to Terminate Proceeding, filed concurrently herewith, and designated as Exhibit 2016 – as business confidential information which shall be kept separate from the file of the involved patent. In view of that request, the settlement agreement has been filed for access by the “Parties and Board Only.”

Dated March 2, 2017

/s/Peter Lambrianakos /

Alfred R. Fabricant
Admitted Pro Hac Vice
Backup Counsel for Patent Owner
Brown Rudnick LLP
7 Times Square
New York, NY 10036
Tel: 212-209-4800
Fax: 212-209-4801
Email: afabricant@brownrudnick.com

Peter Lambrianakos (Reg. No. 58,279)
Lead Counsel for Patent Owner
Brown Rudnick LLP
7 Times Square
New York, NY 10036
Tel: 212-209-4800
Fax: 212-209-4801
Email: plambrianakos@brownrudnick.com

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 Treat Settlement Agreement as Business Confidential Information
Under 35 U.S.C. § 317 and 37 C.F.R. § 42.74 on Petitioner at the correspondence
address of the Petitioner as follows:

Joseph Melnik
Reg. No. 48,741
jmelnik@jonesday.com
JONES DAY
1755 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 739-3939
Facsimile: (650) 739-3939

Joseph M. Beauchamp
Reg. No. 46,544
jbeauchamp@jonesday.com
H. Albert Liou
Reg. No. 71,504
aliou@jonesday.com
JONES DAY
717 Texas Avenue, Suite 3300
Houston, Texas 77002
Telephone: (832) 239-3939 Facsimile:
(832) 239-3600

March 2, 2017

By: /Peter Lambrianakos/
Peter Lambrianakos (Reg. No. 58,279)
Lead Counsel for Patent Owner
Brown Rudnick LLP
7 Times Square
New York, NY 10036
Tel: 212-209-4800
Fax: 212-209-4801