

IPR2016-00421
PATENT NO. 7,489,786

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION
Petitioner

v.

BLITZSAFE TEXAS, LLC
Patent Owner

Patent No. 8,155,342
Issue Date: April 10, 2012
Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

**BLITZSAFE TEXAS, LLC'S UPDATED MANDATORY NOTICES
PURSUANT TO 37 C.F.R. § 42.8 (a)(2) AND DESIGNATION OF BACK-UP
COUNSEL**

Case No. IPR2016-00418

Pursuant to 37 C.F.R. § 42.8(a)(3) and (b)(2), Patent Owner, Blitzsafe

Texas, LLC, hereby files updated Mandatory Notices.

I. 37 C.F.R § 42.8(b)(2) – RELATED MATTERS

Pursuant to 37 C.F.R § 42.8(b)(2), Patent Owner notes the following related matters where Patent Owner asserted U.S. Patent No. 7,489,786 (“the ’786 Patent”):

Patent Owner asserted the ’786 Patent, and the related U.S. Patent No. 8,155,342 (“the ’342 Patent”) in the following cases:

- *Blitzsafe Texas, LLC v. Hyundai Motor Company et al.*, Civ. A. No. 15-cv-01275-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.*, Civ. A. No. 15-cv-01274-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Volkswagen Group of America, Inc. et al.*, Civ. A. No. 15-cv-01278-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Nissan Motor Co., Ltd. et al.*, Civ. A. No. 15-cv-01276-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Toyota Motor Corporation et al.*, Civ. A. No. 15-cv-01277-JRG (E.D. Tex.).

The ’342 and ’786 Patents are also the subject of the following Petitions for

inter partes review:

- Petitions for *inter partes* review of the '342 Patent: IPR2016-00418, -00419, -00118, -01445, -01449, -01473, -01476, -01533, -01557.
- Petitions for *inter partes* review of the '786 Patent: IPR2016-00421, -00422, -01448, -01472, -01477.

IPR2016-00419, -00422, and -00118 have been denied.

The '786 Patent was also asserted in the following matters:

- *Marlowe Patent Holdings LLC v. DICE Electronics, LLC et al.*, 3:10-cv-01199 (D. NJ).
- *Marlowe Patent Holdings LLC v. Ford Motor Company*, 3:10-cv-07044 (D. NJ).

Both cases are settled.

II. DISCLOSURE OF ADDITIONAL BACK-UP COUNSEL

Patent Owner BlitzSafe Texas, LLC ("Patent Owner") hereby provides notice that it has added Vincent J. Rubino, III (Reg. No. 68,594) and Shahar Harel (Reg. No. 73,203) as back-up counsel in this proceeding. Pursuant to 37 C.F.R. § 42.8(b)(3), Patent Owner's updated mandatory notices are below, reflecting the addition of Mr. Rubino and Mr. Harel.

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Respectfully submitted,

Dated August 10, 2016

/s/ Peter Lambrianakos

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

A copy of BLITZSAFE TEXAS, LLC'S DESIGNATION OF BACK-UP
COUNSEL has been served on Petitioner at the correspondence of the Petitioner as
follows:

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Dated August 10, 2016

/s/ Peter Lambrianakos

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