

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

DECLARATION OF IRA MARLOWE

Case No. IPR2016-00418

IPR2016-00418, EX. 2004
Blitzsafe Texas, LLC, Patent Owner

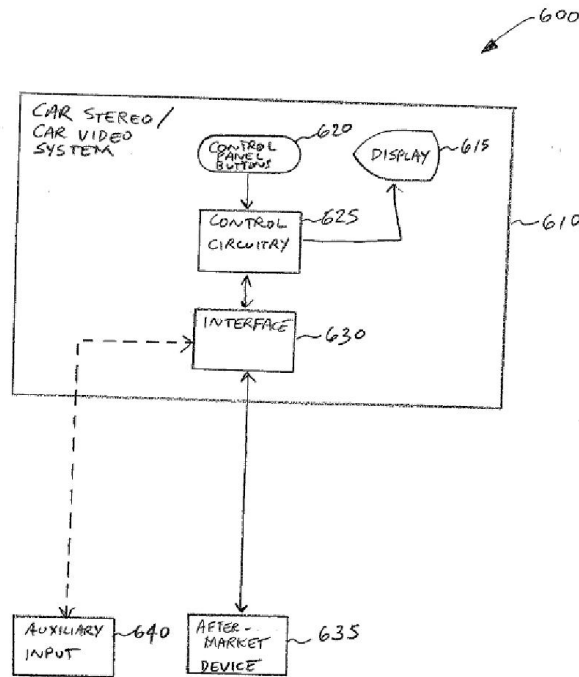
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I, Ira Marlowe, declare as follows:

1. I am the named inventor of U.S. Patent No. 8,155,342 (the '342 Patent).
2. I am also the named inventor of three U.S. Patent Applications to which the '342 Patent claims priority: U.S. Patent Appl. No. 11/071,667 (the '667 Application), 10/732,909 (the '909 Application), and 10/316,961 (the '961 Application). The '961 Application, which was filed on December 11, 2002, ultimately issued as U.S. Patent No. 7,489,786.
3. From the early-1980's to the present, I have been working as the CEO and president of Blitzsafe, a company that designs, manufactures, and sells aftermarket car audio/video equipment.
4. I have been working in the field of car audio video interfaces since the mid-1990's and I have invented many types of interfaces that connect aftermarket devices to car audio/video systems, several of which are described and claimed in the '786 Patent, the '342 Patent and the applications set forth above.

5. Specifically with regard to the '667 Application, the application was filed on March 3, 2005. I conceived of the inventions set forth in the '667 Application prior to March 3, 2005, and at least as early as the end of January of 2005.
6. At least as early as January of 2005, I had retained my patent attorneys, Mr. Mike Friscia and Mr. Mark Nikolsky to draft the '667 Application.
7. Exhibit M1 to this Declaration is a true and accurate copy of an email I had received from Mr. Friscia's assistant Ms. Janelle Fava. The email attaches a draft patent application that was an initial draft of the '667 Application,
8. I note that this initial draft included Figure 10, which I had conceived of, reproduced below.

FIG. 10



9.

10. From February 8 until March 3, I continued to exchange correspondence with Mr. Friscia and Mr. Nikolsky, and we worked diligently to file the '667 Application. Below is a description of our efforts to file the '667 Application during that period.

11. After I received the February 8 communication I worked to supply additional information regarding the names and models of chips to include in the application, and it was my understanding that Mr. Nikolsky and Mr. Friscia continued to work to revise the '667 Application.

12. Between February 8 and February 16, Mr. Nikolsky and I had additional communications regarding the application.
13. On February 16, I sent Mr. Nikolsky an email with code portions describing the command conversion between the iPod and the Ford OEM environment. I had designed these code portions prior to my communication with Mr. Nikolsky, and I provided them for addition to the application. A true and correct copy of this February 16 email is attached as exhibit M2 to this Declaration.
14. Between February 8 and February 18, I also had discussions with Mr. Nikolsky and Mr. Friscia regarding an additional features of the '667 Application. It was my understanding that between February 8 and February 18, Mr. Nikolsky and Mr. Friscia were incorporating those ideas into the '667 Application.
15. On February 18, 2005, I received a revised draft of the '667 Application from Mr. Nikolsky via email. A true and accurate copy of the February 18, 2005 email is attached as Exhibit M3 to this Declaration. As reflected in the email correspondence, this draft included the additional code portions I had sent to Mr. Nikolsky on February 16 along with a new Figure 16. I note that

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