

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Hyundai Motor Company Ltd., Hyundai Motor America, Hyundai Motor
Manufacturing Alabama, LLC, Kia Motors Corporation, Kia Motors America, Inc.,
and Kia Motors Manufacturing Georgia, Inc.,
Petitioners

v.

Blitzsafe Texas, LLC,
Patent Owner

U.S. Patent No. 8,155,342
Filing Date: June 27, 2006
Issue Date: April 10, 2012
Title: Multimedia Device Integration System

Inter Partes Review No.: (Unassigned)

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,155,342
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-100, ET SEQ.**

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. COMPLIANCE WITH FORMAL REQUIREMENTS	1
A. Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4)	1
1. Real Parties-In-Interest	1
2. Related Matters	2
3. Lead and Backup Counsel	2
4. Service Information.....	3
B. Proof of Service on the Patent Owner.....	3
C. Power of Attorney	3
D. Standing.....	4
E. Fees.....	4
III. STATEMENT OF PRECISE RELIEF REQUESTED	4
A. Prior Art Patents and Publications	4
B. Identification of Challenges and Relief Requested.....	5
IV. FULL STATEMENT OF REASONS FOR REQUESTED RELIEF	6
A. Summary of the '342 Patent.....	6
B. The '342 Patent's Prosecution History	10
C. Person of Ordinary Skill in the Art	13
D. Claim Construction	13
1. "integration subsystem"	15
2. "car audio/video system"	15
4. "generated . . . for playing on the car audio/video system"	16
5. "format incompatible with the portable device"	16
6. "device presence signal"	16
E. Ground 1: Claims 49-52, 54, 56, 62-64, 71 and 120 are Anticipated by Shibasaki Under 35 U.S.C. §§ 102(a) or 102 (e) (pre-AIA).....	17

TABLE OF CONTENTS
(continued)

	Page
1. Overview of Shibasaki	17
2. Detailed Analysis	20
F. Ground 2: Claims 53, 73-78, 95, 97, 99-101, 106 and 109-111 are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) in Light of Shibasaki and the Knowledge of a Person of Ordinary Skill in the Art.....	42
1. Detailed Analysis	42
G. Ground 3: : Claims 55, 57, 73, 79 and 80 are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) In Light Of Shibasaki And Tong	54
1. Overview of Tong	54
2. Obvious to Combine Shibasaki and Tong	55
3. Detailed Analysis	56
H. Ground 4: Claims 53 and 77 Are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) In Light Of Shibasaki And AVRCP 1.0	63
1. Overview of AVRCP 1.0	63
2. Obvious to Combine Shibasaki And AVRCP 1.0	63
3. Detailed Analysis	64
I. Ground 5: Claims 49, 73, 97, and 120 are Obvious Under 35 U.S.C. § 103(a) (pre-AIA) In Light Of Shibasaki And A2DP 1.0	69
1. Overview of A2DP 1.0	69
2. Obvious to Combine Shibasaki And A2DP 1.0.....	69
3. Detailed Analysis	70
V. CONCLUSION.....	74

EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 8,155,342 (“’342 patent”)
1002	File History of U.S. Patent No. 8,155,342
1003	Declaration of Chris Kyriakakis, Ph.D.
1004	Joint Claim Construction Chart from <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.</i> , 2:15-cv-01274 (E.D. Tex.)(lead case)
1005	Plaintiff’s Disclosure Of Asserted Claims And Infringement Contentions (with Appendices A-D) from <i>Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.</i> , 2:15-cv-01274 (E.D. Tex.)(lead case)
1006	U.S. Patent No. 7,110,755 (“Shibasaki”)
1007	Optimize Bluetooth Car Kit Design, Implementation, Nov. 17, 2003 (“Tong”)
1008	Bluetooth Audio/Video Remote Control Profile, v. 1.0, May 22, 2003 (“AVRCP 1.0”)
1009	Bluetooth Advanced Audio Distribution Profile, v. 1.0, May 22, 2003 (“A2DP 1.0”)
1010	IPR2016-00118, Paper 19 (“IPR ’118”)
1011	IPR2016-00418, Paper 13 (“IPR ’418”)

I. INTRODUCTION

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, Petitioners Hyundai Motor Company (“HMC”), Hyundai Motor America (“HMA”), Hyundai Motor Manufacturing Alabama, LLC (“HMMA”), Kia Motors Corporation (“KMC”), Kia Motors America, Inc. (“KMA”), and Kia Motors Manufacturing Georgia, Inc. (“KMMG”) (collectively, “Hyundai and Kia” or “Petitioners”) respectfully request *Inter Partes* Review of claims 49, 50, 51, 52, 53, 54, 55, 56, 57, 62, 63, 64, 71, 73, 77, 78, 79, 80, 95, 97, 99, 100, 101, 102, 103, 106, 109, 110, 111 and 120 of U.S. Patent 8,155,342 (Ex. 1001, the “’342 patent”), which is currently assigned to Blitzsafe Texas LLC (“Blitzsafe”) according to the US Patent and Trademark Office assignment records. There is a reasonable likelihood that Petitioners will prevail with respect to at least one of the claims challenged herein.

II. COMPLIANCE WITH FORMAL REQUIREMENTS

A. Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4)

1. Real Parties-In-Interest

Hyundai Motor Company (“HMC”), Hyundai Motor America (“HMA”), Hyundai Motor Manufacturing Alabama, LLC (“HMMA”), Kia Motors Corporation (“KMC”), Kia Motors America, Inc. (“KMA”), and Kia Motors Manufacturing Georgia, Inc. (“KMMG”) (collectively, “Hyundai and Kia” or “Petitioners”) are the real parties-in-interest.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.