

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION,)
Petitioner,)
Case)
vs.) IPR2016-00418
Patent 8,155,342)
BLITZSAFE TEXAS, LLC,)
Patent Owner.)
_____)

VIDEOTAPED DEPOSITION OF IRA MARLOWE
New York, New York
Thursday, December 22, 2016

Reported by:
Jeremy Frank, MPM



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

December 22, 2016

2:38 p. m.

Deposition of IRA MARLOWE, held at the
offices of Brown Rudnick, LLP, 7 Times Square,
New York, New York, pursuant to Notice, before
Jeremy Frank, a Notary Public of the State of
New York.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S :

SUGHRUE MION, PLLC

Attorneys for Petitioner

2100 Pennsylvania Avenue, NW

Washington, DC 20037

BY: WILLIAM H. MANDIR, ESQ.

WMandir@sughrue.com

(202) 663-7959

MARGARET M. WELSH, ESQ.

MWelsh@sughrue.com

(202) 663-7395

BROWN RUDNICK LLP

Attorneys for Patent Owner

Seven Times Square

New York, NY 10036

BY: PETER LAMBRIANAKOS, ESQ.

PLambrianakos@brownrudnick.com

(212) 209-4813

ALSO PRESENT:

JOSE RIVERA, videographer

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IT IS HEREBY STIPULATED AND AGREED, by
and between counsel for the respective
parties hereto, that the filing, sealing and
certification of the within deposition shall
be and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED that
all objections, except as to the form of the
question, shall be reserved to the time of the
trial;

IT IS FURTHER STIPULATED AND AGREED that
the within deposition may be signed before any
Notary Public with the same force and effect
as if signed and sworn to before the Court.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

THE VIDEOGRAPHER: Here begins media unit number one, volume one in the deposition of Ira Marlowe in the matter of Toyota Motor Corp versus Blitzsafe Texas, LLC. Today's date is December 22nd, 2016, the time is 2:38 p.m. This deposition is being taken at Brown Rudnick LLP, Seven Times Square, New York, New York. I'm Jose Rivera, the videographer, the court reporter is Jeremy Frank from Gregory Edwards, LLC.

Will counsel please identify yourselves and state whom you represent.

MR. MANDIR: William Mandir for the petitioner, Toyota Motor Corp, and with me is Margaret Welsh also from Sughrue Mion in Washington D.C.

MR. LAMBRIANAKOS: Peter Lambrianakos of Brown Rudnick on behalf of the patent owner, Blitzsafe Texas, LLC.

THE VIDEOGRAPHER: Now will the court reporter please swear in the witness.

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.