

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**TOYOTA MOTOR CORPORATION,  
Petitioner,**

**v.**

**BLITZSAFE TEXAS, LLC,  
Patent Owner**

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**Case IPR2016-00418  
Patent 8,155,342**

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**PETITIONER'S REPLY TO PATENT OWNER'S  
RESPONSE TO PETITION**

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**UPDATED PETITIONER'S EXHIBITS LIST**

<b>Exhibit</b>	<b>Description</b>
1001	U.S. Patent No. 8,155,342 ("the '342 patent")
1002	U.S. Patent Application Publication No. 2006/0181963 ("Clayton")
1003	U.S. Provisional Application No. 60/651,963 ("Clayton Provisional")
1004	U.S. Patent No. 6,559,773 ("Berry")
1005	U.S. Patent Application Publication No. 2003/0215102 ("Marlowe")
1006	U.S. Patent No. 6,421,305 ("Gioscia")
1007	Claim Construction Ruling in Marlowe Patent Holdings LLC v. DICE Electronics, LLC et al., 3:10-cv-01199 (D. NJ) and Marlowe Patent Holdings LLC v. Ford Motor Company, 3:10-cv-07044 (D. NJ)
1008	U.S. Patent Application No. 11/475,847 ("the '847 application")
1009	U.S. Patent Application No. 11/071,667 ("the '667 application")
1010	U.S. Patent Application No. 10/732,909 ("the '909 application")
1011	U.S. Patent Application No. 10/316,961 ("the '961 application")
1012	Highlighted '342 Patent (Showing the New Matter)
1013	Plaintiff's Disclosure of Asserted Claims and Infringement Contentions, served in Blitzsafe Texas, LLC v. Toyota Motor Corp. et al., 2-15-cv-01277 (E.D. TX)
1014	File History of the '342 Patent
1015	1999 ID3v2.3 Metadata Standard (1999)
1016	Declaration of Dr. Thomas Matheson
1017	Canadian Patent Application Publication No. CA 2347648 ("Kandler")
1018	International Publication No. WO 01/67266 A1 ("Lau")
1019	U.S. Patent Application Publication No. 2001/0028717 ("Ohmura")
1020	Bluetooth ESDP for UPnP (2001)
1021	Universal Plug and Play Device Architecture (2000)
1022	Petition (Paper 1) of IPR2016-01476
1023	A2DP 1.0 Protocol
1024	Patent Owner's Preliminary Response (Paper 9) in IPR2016-00419

TOYOTA'S REPLY TO PATENT OWNER'S RESPONSE  
Case IPR2016-00418

1025	Decision on Request for Rehearing (Paper 15) in IPR2016-00419
1026	Deposition Transcript of Ira Marlowe
1027	Reply Declaration of Dr. Thomas Matheson

## **I. INTRODUCTION**

Petitioner Toyota Motor Corporation (“Toyota” or “Petitioner”) timely submits this “Petitioner's Reply to Patent Owner Response” (“Reply”) in response to the “Patent Owner’s Response” (Paper 20) filed by Blitzsafe Texas, LLC (“Blitzsafe” or “Patent Owner”) on September 30, 2016. Petitioner respectfully requests entry and consideration of this Reply, and a final determination that claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, and 120 (“Challenged Claims”) are invalid and canceled.

## **II. CLAIMS 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, AND 120 ARE INVALID BY THE INSTITUTED GROUNDS**

### **1. Clayton Discloses "Audio Generated By The Portable Device"**

In its Patent Owner's Response (Paper 20), Blitzsafe alleges only one distinction over the prior art: "Clayton does not teach or disclose an integration subsystem that receives 'audio generated by the portable device.'" Paper 20 at 1. In a related IPR applying the Ohmura reference (US2001/0028717), the Board interpreted this "audio generated" claim limitation to require that the audio be decoded on the portable device, and denied institution on this basis. Decision on Request for Rehearing (Paper 15) in IPR2016-00419 (Ex. 1026) at 5 (August 31, 2016). Citing to this construction, Blitzsafe argues that "Clayton does not teach or

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