### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

	§	
BLITZSAFE TEXAS, LLC,	§	
	§	
Plaintiff,	§	
	§	Case No. 2:15-cv-1274-JRG-RSP
<b>v.</b>	§	LEAD CASE
	§	
TOYOTA MOTOR CORPORATION;	§	JURY TRIAL DEMANDED
TOYOTA MOTOR SALES U.S.A., INC.;	§	
TOYOTA MOTOR MANUFACTURING	§	
TEXAS, INC.; TOYOTA MOTOR	§	
MANUFACTURING KENTUCKY, INC.;	§	
and TOYOTA MOTOR	§	
MANUFACTURING MISSISIPPI, INC.,	§	
	§	
Defendants.	§	
	§	
	§	

### PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

Plaintiff Blitzsafe Texas, LLC ("Blitzsafe") hereby makes the following infringement disclosures under the Patent Local Rules with respect to United States Patent Nos. 7,489,786 ("the '786 patent") and 8,155,342 ("the '342 patent") (collectively, "Blitzsafe Patents"). Blitzsafe's investigation is ongoing and discovery is in its preliminary stages. Accordingly, these disclosures are based on information available to Blitzsafe at this time. Blitzsafe reserves the right to supplement this disclosure after further discovery from the defendants and non-parties, particularly documents and other discovery regarding the defendants' accused devices. Blitzsafe also reserves the right to assert additional claims of the Blitzsafe Patents, accuse different products, or find alternative literal and/or equivalent infringing elements in the defendant's products.

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## I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO PATENT LOCAL RULE 3-1

### A. ASSERTED CLAIMS

### 1. <u>Toyota Accused Products</u>

Defendants Toyota Motor Corporation, Toyota Motor Sales U.S.A., Inc., Toyota Motor Manufacturing, Texas, Inc., Toyota Motor Manufacturing Kentucky, Inc., and Toyota Motor Manufacturing Mississippi, Inc. (collectively, "Toyota") have infringed and continue to infringe at least the following claims of the Blitzsafe Patents in connection with the Toyota Accused Products set forth below:

- Claims 1, 2, 4-8, 10, 13, 14, 23, 24, 44, 47, 57, 58, 60-65, 86, 88-92, 94, 97, and 98 of the '786 patent; and
- Claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, and 120 of the '342 patent.
  - 2. <u>Lexus Accused Products</u>

Toyota has infringed and continues to infringe at least the following claims of the Blitzsafe patents in connection with the Lexus Accused Products set forth below:

- Claim 1, 2, 4-8, 10, 13, 14, 23, 24, 44, 47, 57, 58, 60-65, 86, 88-92, 94, 97, and 98 of the '786 patent; and
- Claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, and 120 of the '342 patent.

Blitzsafe reserves the right to seek leave of court to add, delete, substitute, or otherwise amend this list of asserted claims should further discovery, the Court's claim construction, or other circumstances so merit.

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS

## **B.** ACCUSED INSTRUMENTALITIES

#### 1. <u>Toyota Accused Products</u>

a. '786 Patent

Blitzsafe is currently aware that the infotainment systems of the following accused Toyota

brand Toyota automobiles infringe the '786 Patent:

2010-2016 Toyota 4Runner

2011-2016 Toyota Avalon

2010-2016 Toyota Camry

2011-2016 Toyota Corolla

2011-2016 Toyota Highlander

2010-2016 Toyota Land Cruiser

2012-2016 Toyota Prius

2012-2016 Toyota RAV4

2010-2016 Toyota Sequoia

2011-2016 Toyota Sienna

2012-2016 Toyota Tacoma

2010-2016 Toyota Tundra

2010-2016 Toyota Venza

b. '342 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Toyota

brand Toyota automobiles infringe the '342 Patent:

2010-2016 Toyota 4Runner

2011-2016 Toyota Avalon

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS

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- 2010-2016 Toyota Camry
- 2011-2016 Toyota Corolla
- 2011-2016 Toyota Highlander
- 2010-2016 Toyota Land Cruiser
- 2012-2016 Toyota Prius
- 2012-2016 Toyota RAV4
- 2010-2016 Toyota Sequoia
- 2011-2016 Toyota Sienna
- 2012-2016 Toyota Tacoma
- 2010-2016 Toyota Tundra
- 2010-2016 Toyota Venza
- 2. <u>Lexus Accused Products</u>
  - a. '786 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Lexus brand Toyota automobiles infringe the '786 Patent:

2010-2016 Lexus CT 2010-2016 Lexus IS 2010- 2012 Lexus HS 2010-2016 Lexus GS 2010-2016 Lexus LS 2015-2016 Lexus RC 2012 Lexus LFA

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS

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2015-2016 Lexus NX

2010-2016 Lexus GX

2010-2016 Lexus LX

2009 Lexus CT, Lexus IS, Lexus HS, Lexus ES, Lexus GS, Lexus LS, Lexus RX,

Lexus GX, Lexus LX with Lexus Interface Kit for iPod

b. '342 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Lexus brand Toyota automobiles infringe the '342 Patent:

2010-2016 Lexus CT 2010-2016 Lexus IS 2010- 2012 Lexus HS 2010-2016 Lexus GS 2010-2016 Lexus LS 2015-2016 Lexus RC 2012 Lexus LFA 2015-2016 Lexus NX 2010-2016 Lexus GX 2010-2016 Lexus LX

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