



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

**A. ASSERTED CLAIMS**

1. Toyota Accused Products

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. Lexus Accused Products

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.

**B. ACCUSED INSTRUMENTALITIES**

1. Toyota Accused Products
  - 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

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. Lexus Accused Products

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

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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