

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION

Petitioner

v.

BLITZSAFE TEXAS, LLC

Patent Owner

Patent No. 8,155,342

Issued: Apr. 10, 2012

Filed: Jun. 27, 2006

Inventor: Ira Marlowe

Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

***Inter Partes* Review No.: Unassigned**

PETITION FOR *INTER PARTES* REVIEW

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EXHIBITS

Exhibit	Description
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)

I. INTRODUCTION

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, Petitioner Toyota Motor Corporation ("Toyota" or "Petitioner") respectfully requests *Inter Partes* Review of claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, and 120 of U.S. Patent No. 8,155,342 (Ex. 1001, "the '342 patent"), which was filed on June 27, 2006 and issued on April 10, 2012 to Ira Marlowe, and is currently assigned to Blitzsafe Texas, LLC. ("Blitzsafe" or "Patent Owner") according to the U.S. Patent and Trademark Office assignment records. There is a reasonable likelihood that Petitioner will prevail with respect to at least one of the claims challenged in this Petition.

II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)

A. REAL PARTY-IN-INTEREST UNDER 37 C.F.R. § 42.8(b)(1)

The Petitioner is Toyota Motor Corporation. Additional Real Parties-in-Interest are: Toyota Motor Sales, U.S.A., Inc.; Toyota Motor Manufacturing Texas, Inc.; Toyota Motor Manufacturing Kentucky, Inc.; and Toyota Motor Manufacturing Mississippi, Inc.

B. RELATED MATTERS UNDER 37 C.F.R. § 42.8(b)(2)

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner states that the '342 patent is currently the subject of the following on-going litigations: *Blitzsafe Texas, LLC v. Nissan Motor Co., Ltd. et al.*, 2-15-cv-01276, July 16, 2015 (E.D. TX); *Blitzsafe*

Texas, LLC v. Toyota Motor Corp. et al., 2-15-cv-01277, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Volkswagen Group of Am., Inc. et al.*, 2-15-cv-01278, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Hyundai Motor Co. et al.*, 2-15-cv-01275, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.*, 2-15-cv-01274, July 16, 2015 (E.D. TX).

U.S. Patent No. 7,489,786 ("the '786 patent"), a parent patent to the '342 patent, was previously the subject of the following litigations: *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). Both cases settled by June 2015.

C. LEAD AND BACK-UP COUNSEL

Lead Counsel for Petitioner is William H. Mandir, Registration No. 32,156. Back-Counsel for Petitioner are John F. Rabena, Registration No. 38,584; Yoshinari Kishimoto, Registration No. 47,327; Brian K. Shelton, Registration No. 50,245; Fadi N. Kiblawi, Registration No. 61,973; and Margaret M. Welsh, Registration No. 70,754. Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney accompanies this Petition.

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