

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.: IPR2016-00418**

**PETITIONER'S REVISED MANDATORY NOTICES
UNDER 37 CFR § 42.8(b)**

Honorable Board:

In accordance with 37 CFR § 42.8(b), Petitioner Toyota Motor Corporation submits the following revised Mandatory Notices, to update the Mandatory Notices filed with the Petition (IPR2016-00418, Paper 1).

A. Real Party-In-Interest

As stated in the Petition, the Petitioner is Toyota Motor Corporation, and 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

As stated in the Petition, 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).

As stated in the Petition, 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.

Additionally, Petitioner has concurrently filed another Petition for *Inter Pares* Review (IPR2016-00419) challenging the claims of the '342 patent on grounds that are non-cumulative with those presented herein. In addition, a Petition for *Inter Partes* Review of the '342 patent (IPR2016-00118) was filed on October 30, 2015 by Unified Patents Inc, challenging claims 1-25, 49, 73, 97, 120, and 121.

C. Lead and Backup Counsel

As stated in the Petition, 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.

D. Service Information

Service of any documents via hand-delivery may be made at the postal mailing addresses listed below. Petitioner also consents to electronic service by email at toyota@sughrue.com.

SUGHRUE MION PLLC
c/o William Mandir
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Respectfully submitted,

/William H. Mandir/

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WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: DECEMBER 31, 2015

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached PETITIONER'S REVISED MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(b) in Case IPR2016-00418 and this Certificate of Service are being served on December 31, 2015 overnight via Federal Express upon the following:

Ira M. Marlowe
BLITZSAFE OF AMERICA, INC.
33 Honeck Street
Englewood, NJ 07631

A courtesy copy of the attached PETITIONER'S REVISED MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(b) has also been sent via e-mail to:

Peter Lambrianakos
Brown Rudnick LLP
Seven Times Square
New York, NY 10036
plambrianakos@brownrudnick.com

/Soo Jin Hur/

Soo Jin Hur