

IPR2016-00419  
PATENT NO. 8,155,342

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

Patent No. 8,155,342  
Issue Date: April 10, 2012  
Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

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**BLITZSAFE TEXAS, LLC'S  
MANDATORY NOTICES PURSUANT TO  
37 C.F.R. §42.8(a)(2)**

Case No. IPR2016-00419

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Pursuant to 37 C.F.R. § 42.8(a)(2), Patent Owner, Blitzsafe Texas, LLC, hereby files its Mandatory Notices. This notice is being timely filed within 21 days of service of the petition (December 30, 2015).

### **I. 37 C.F.R § 42.8(b)(1) – REAL PARTY-IN-INTEREST**

The patent owner and real party-in-interest is Blitzsafe Texas, LLC.

### **II. 37 C.F.R § 42.8(b)(2) – RELATED MATTERS**

Pursuant to 37 C.F.R § 42.8(b)(2), Patent Owner notes the following related matters where Patent Owner asserted U.S. Patent No. 8,155,342 (“the ’342 Patent”):

Patent Owner asserted the ’342 Patent, and the related U.S. Patent No. 7,489,786 (“the ’786 Patent”) in the following cases:

- *Blitzsafe Texas, LLC v. Hyundai Motor Company et al.*, Civ. A. No. 15-cv-01275-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.*, Civ. A. No. 15-cv-01274-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Volkswagen Group of America, Inc. et al.*, Civ. A. No. 15-cv-01278-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Nissan Motor Co., Ltd. et al.*, Civ. A. No. 15-cv-01276-JRG (E.D. Tex.).
- *Blitzsafe Texas, LLC v. Toyota Motor Corporation et al.*, Civ. A. No.

15-cv-01277-JRG (E.D. Tex.).

The '342 and '786 Patents are also the subject of the following Petitions for *inter partes* review:

- Petitions for *inter partes* review of the '342 Patent: IPR2016-00418, -00118.
- Petitions for *inter partes* review of the '786 Patent: IPR2016-00421, -00422.

The '786 Patent was also asserted in the following matters:

- *Marlowe Patent Holdings LLC v. DICE Electronics, LLC et al.*, 3:10-cv-01199 (D. NJ).
- *Marlowe Patent Holdings LLC v. Ford Motor Company*, 3:10-cv-07044 (D. NJ).

Both cases are settled.

### III. 37 C.F.R § 42.8(b)(3) – DISCLOSURE OF COUNSEL

Pursuant to 37 C.F.R § 42.8(b)(3), Patent Owner identifies lead and back-up counsel as follows:

Lead Counsel: Peter Lambrianakos (Reg. No. 58,279)

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#### **IV. 37 C.F.R § 42.8(b)(4) – CORRESPONDENCE**

Pursuant to 37 C.F.R § 42.8(b)(4), Patent Owner requests that all electronic correspondence be directed to lead counsel and back-up counsel at the above address. Patent Owner also consents to electronic service by email at the following address: plambrianakos@brownrudnick.com.

Dated January 20, 2016

/Peter Lambrianakos /  
Lead Counsel for Petitioner

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<sup>1</sup> Alfred Fabricant is identified as back-up counsel subject to appropriate *pro hac vice* motion to be filed upon authorization.

**CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6(e)(4) & 42.105(b)**

A copy of BLITZSAFE TEXAS, LLC'S MANDATORY NOTICES  
PURSUANT TO 37 C.F.R. §42.8(a)(2) has been served on Petitioner at the  
correspondence of the Petitioner as follows:

SUGHRUE MION PLLC  
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January 20, 2016

By: /Peter Lambrianakos /

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