## 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
v.	§	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.



# 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. 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. <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



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



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



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

# **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

# **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

# **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

