

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. 7,489,786

Issue Date: Feb. 10, 2009

Title: AUDIO DEVICE INTEGRATION SYSTEM

**BLITZSAFE TEXAS, LLC'S LIST OF ANTICIPATED MOTIONS IN
ADVANCE OF INITIAL CONFERENCE CALL**

Case No. IPR2016-00421

I. INTRODUCTION

In advance of the Initial Conference Call on July 29, 2016 at 2:30 p.m., Patent Owner Blitzsafe Texas, LLC (“Blitzsafe”) submits the following list of motions that it anticipates filing during this trial. See Office Patent Trial Practice Guide, 77 Fed. Reg. at 48,765-66. This listing is without prejudice to Blitzsafe’s right to seek authorization to bring additional motions as circumstances warrant.

- (1) Motion for Modification of Scheduling Order. Blitzsafe has contacted counsel for Petitioner Toyota Motor Corporation (“Toyota”) to potentially seek agreement for a joint motion to extend each of Due Dates 1-4. Blitzsafe also intends to raise the timing of the oral argument (Due Date 7) because it overlaps with the parties’ currently scheduled trial in the Eastern District of Texas.
- (2) Motion for Discovery. The parties did not agree, prior to institution of the trial, to exchange of the initial disclosures set forth in the Office Patent Trial Practice Guide. Pursuant to 37 C.F.R. § 42.51(a)(2), Blitzsafe would move to seek discovery of such information. Blitzsafe may also move for additional discovery relating to secondary considerations.
- (3) Motion to Amend Claims under 37 C.F.R. § 42.121
- (4) Motion to Substitute Lead and/or Backup Counsel within the same

law firm.

Respectfully submitted,

Dated July 27, 2016

/s/Peter Lambrianakos /

Alfred R. Fabricant
Admitted Pro Hac Vice
Backup Counsel for Patent Owner
Brown Rudnick LLP
7 Times Square
New York, NY 10036
Tel: 212-209-4800
Fax: 212-209-4801
Email: afabricant@brownrudnick.com

Peter Lambrianakos (Reg. No. 58,279)
Lead Counsel for Patent Owner
Brown Rudnick LLP
7 Times Square
New York, NY 10036
Tel: 212-209-4800
Fax: 212-209-4801
Email: plambrianakos@brownrudnick.com

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

A copy of BLITZSAFE TEXAS, LLC'S LIST OF ANTICIPATED
MOTIONS IN ADVANCE OF INITIAL CONFERENCE CALL has been served
on Petitioner at the correspondence of the Petitioner as follows:

SUGHRUE MION PLLC
c/o William Mandir
2100 Pennsylvania Ave NW
Suite 800
Washington, DC 20037
toyota@sughrue.com

July 27, 2016

By: /s/ Peter Lambrianakos/

Peter Lambrianakos (Reg. No. 58,279)
Lead Counsel for Patent Owner
Brown Rudnick LLP
7 Times Square
New York, NY 10036
Tel: 212-209-4800
Fax: 212-209-4801