

IPR2016-00422
PATENT NO. 7,489,786

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: February 10, 2009
Title: AUDIO DEVICE INTEGRATION SYSTEM

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

Case No. IPR2016-00422

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. 7,489,786 (“the ’786 Patent”):

The ’786 Patent was 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.

Patent Owner asserted the ’786 Patent, and the related U.S. Patent No. 8,155,342 (“the ’342 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, -00419, -00118.
- Petitions for *inter partes* review of the '786 Patent: IPR2016-00421.

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)

Electronic Service information: plambrianakos@brownrudnick.com

Post and Delivery: Brown Rudnick LLP, 7 Times Square, New York, NY 10036

Telephone: 212-209-4800 Facsimile: 212-209-4801

Back-up Counsel: Alfred R. Fabricant¹

Electronic Service information: afabricant@brownrudnick.com

Post and Delivery: Brown Rudnick LLP, 7 Times Square, New York, NY 10036

Telephone: 212-209-4800 Facsimile: 212-209-4801

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

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

¹ 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(a)

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

January 20, 2016

By: /Peter Lambrianakos /

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