

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

Issued: Feb. 10, 2009

Filed: Dec. 11, 2002

Inventor: Ira Marlowe

Title: AUDIO DEVICE INTEGRATION SYSTEM

Inter Partes Review No.: Unassigned

PETITION FOR *INTER PARTES* REVIEW

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EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 7,489,786 (“the ‘786 Patent”)
1002	File History of U.S. Patent No. 7,489,786
1003	International Publication No. WO 01/67266 A1 (“Lau)
1004	U.S. Patent Publication No. 2001/0028717 A1 (“Ohmura”)
1005	Sony XR-C5120 FM/AM Cassette Car Stereo Operating Instructions (“Sony XR-C5120 Manual”)
1006	Sony XA-C30 Service Manual (“Sony XA-C30 Manual”)
1007	U.S. Patent No. 6,175,789 (“Beckert”)
1008	U.S. Patent No. 6,629,197 (“Bhogal”)
1009	Claim Construction Ruling in 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).
1010	Sony XR-C5120R FM/AM Cassette Car Stereo Operating Instructions (“Sony XR-C5120R Manual”)
1011	NEC μ PD75004 Data Sheet
1012	Merriam Webster, definition of “device” (www.merriam-webster.com/dictionary/device)
1013	Japanese Unexamined Patent Application No. H7-6954 to Ouchida (“JP ‘954”)
1014	Certified translation of Ex. 1013
1015	Declaration of Thomas G. Matheson, Ph.D.

I. INTRODUCTION

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, Petitioner Toyota Motor Corporation (“Petitioner”) respectfully requests *Inter Partes* Review of claims 1, 2, 4-8, 10, 13, 14, 23, 24, 44, 47, 57, 58, 60-65, 86, 88-92, 94, 97, and 98 of U.S. Patent 7,489,786 (Ex. 1001, the “’786 Patent”), which is currently assigned to Blitzsafe Texas LLC (“Blitzsafe”) according to the US Patent and Trademark Office assignment records. There is a reasonable likelihood that Petitioner will prevail with respect to at least one of the claims challenged herein.

II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)

A. Real Party-in-Interest under 37 C.F.R. § 42(b)(1)

The Petitioner is Toyota Motor Corporation. 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 under 37 C.F.R. § 42.8(b)(2)

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner states that the ’786 Patent is presently asserted in the following patent infringement lawsuits by Blitzsafe, which may affect, or be affected by, a decision in this proceeding: *Blitzsafe Texas, LLC v. Toyota Motor Corp. et al.*, 2:15-cv-01277 (E.D. Tex.); *Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.*, 2:15-cv-01274 (E.D. Tex.); *Blitzsafe Texas, LLC v. Hyundai Motor Co. et al.*, 2:15-cv-01276 (E.D. Tex.); and *Blitzsafe Texas, LLC v.*

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