

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.
Petitioner

v.

BLITZSAFE TEXAS, LLC
Patent Owner

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

**VOLKSWAGEN GROUP OF AMERICA, INC. AND BLITZSAFE TEXAS,
LLC'S JOINT MOTION TO TERMINATE PROCEEDING PURSUANT TO
35 U.S.C. § 317 AND 37 C.F.R. § 42.74**

Case No. IPR2016-01445

Pursuant to 35 U.S.C. § 317, 37 C.F.R. § 42.74, and the conference call between the Petitioner, Patent Owner, and Patent and Trial and Appeal Board on January 26, 2017, authorizing filing of the present motion, Petitioner Volkswagen Group of America, Inc. and Patent Owner Blitzsafe Texas, LLC (the “Parties”) jointly request termination of the *inter partes* review of U.S. Patent No. 8,155,342, Case No. IPR2016-01445, without prejudice to either Party.

1. Termination as to the Patent Owner and Petitioner is Appropriate

The *inter partes* review has not been instituted and the Parties have settled their dispute and have agreed to request termination of this *inter partes* review proceeding. More specifically, the Parties have settled and dismissed their related district court litigation (Blitzsafe Texas, LLC v. Volkswagen Group of America, Inc. *et al.*, Civ. A. No. 2:15-cv-01278-JRG-RSP (E.D. Tex.) (Dismissed on January 26, 2017)) and have also agreed to jointly request termination of this proceeding and related *inter partes* review of U.S. Patent No. 8,155,342, Case No. IPR2016-01449.

2. Treatment of Settlement Agreement as Business Confidential Information

Pursuant to 37 C.F.R. § 42.74(b), the Parties’ settlement agreement has been made in writing and a true and correct copy of the settlement agreement is being filed concurrently with the present motion as Exhibit 2004.

The Parties hereby jointly request that the settlement agreement be treated as business confidential information and be kept separate from the files of the above captioned IPR pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

3. Conclusion

For the foregoing reasons, the Parties jointly and respectfully request termination of the present proceeding, Case No. IPR2016-01445, without prejudice to either Party.

Respectfully submitted,

Dated January 27, 2017

By: /Peter Lambrianakos/

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PATENT OWNER'S UPDATED EXHIBIT LIST

Exhibit #	Exhibit Name
2001	U.S. Pat. App. No. 11/071,667 Published as U.S. Pat. App. Pub. No. 2005/0239434
2002	IPR2016-00418 Decision
2003	IPR2016-00419 Decision
2004	Settlement Agreement (Parties and Board Only)

CERTIFICATE OF SERVICE

The foregoing Volkswagen Group of America, Inc. and Blitzsafe Texas, LLC's Joint Motion to Terminate Proceeding Pursuant to 35 U.S.C. § 317 and 37 C.F.R. § 42.74 and Exhibit 2004 were served on January 27, 2017 upon the following:

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January 27, 2017

By: /s/ Peter Lambrianakos/

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