

**I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS
PURSUANT TO PATENT LOCAL RULE 3-1**

A. ASSERTED CLAIMS

1. Volkswagen Accused Products

Defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, Inc. (collectively, “Volkswagen”) have infringed and continue to infringe at least the following claims of the Blitzsafe patents in connection with the Volkswagen Accused Products set forth below:

- Claim 1, 2, 4-8, 13, 14, 23, 24, 44, 47, 57, 58, 60-65, 86, 88-92, 94, 97, and 98 of the '786 patent; and
- Claims 49-54, 56, 62-64, 71, 73-78, 95, 97, 99-101, 106, 109-111, and 120 of the '342 patent.

2. Audi Accused Products

Volkswagen has infringed and continues to infringe at least the following claims of the Blitzsafe patents in connection with the Audi Accused Products set forth below:

- Claim 1, 2, 4-8, 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. Volkswagen Accused Products

a. '786 Patent

Blitzsafe is currently aware that the infotainment systems of the following accused Volkswagen brand Volkswagen automobiles infringe the '786 Patent:

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Jetta SportWagen

2010-2016 Volkswagen Golf

2010-2016 Volkswagen Golf R

2010-2016 Volkswagen Beetle

2010-2016 Volkswagen Passat

2010-2016 Volkswagen CC

2010-2016 Volkswagen Toureg

2010-2016 Volkswagen Tiguan

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Eos

b. '342 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Volkswagen brand Volkswagen automobiles infringe the '342 Patent:

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Jetta SportWagen

2010-2016 Volkswagen Golf

2010-2016 Volkswagen Golf R

2010-2016 Volkswagen Beetle

2010-2016 Volkswagen Passat

2010-2016 Volkswagen CC

2010-2016 Volkswagen Toureg

2010-2016 Volkswagen Tiguan

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Eos

2. Audi Brand Accused Products

a. '786 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Audi brand Volkswagen automobiles infringe the '786 Patent:

2013-2016 Audi A3/S3

2009-2016 Audi A4/S4/A5/S5/RS5

2009-2016 Audi A6/S6/A7/S7/RS7

2009-2016 Audi A8/S8

2012-2016 Audi Q3

2009-2016 Audi Q5/SQ5

2009-2016 Audi Q7

2009-2016 Audi TT/TT-s/TT-RS

2009-2016 Audi R8

b. '342 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Audi brand Volkswagen automobiles infringe the '342 Patent:

2013-2016 Audi A3/S3

2013-2016 Audi A4/S4/A5/S5/RS5

2012-2016 Audi A6/S6/A7/S7/RS7

2012-2016 Audi A8/S8

2013-2016 Audi Q3

2013-2016 Audi Q5/SQ5

2012-2016 Audi Q7

2013-2016 Audi TT/TT-s/TT-RS

Blitzsafe reserves the right to amend this list of accused instrumentalities, as well as other information contained in this document and the exhibits hereto, to incorporate new information learned during the course of discovery, including, but not limited to, the inclusion of newly released products or any other equivalent devices ascertained through discovery.

C. CLAIM CHARTS

Claim charts identifying a location of every element of every asserted claim of the Blitzsafe Patents within accused products are attached hereto as Appendices A–D. Blitzsafe believes that the Volkswagen Accused Products and Audi Accused Products cited in the claim charts are representative of the Volkswagen Accused Products and Audi Accused Products. Blitzsafe reserves the right to amend these claim charts as well as other information contained in this document and the appendices hereto, to incorporate new information learned during the course of discovery, including, but not limited to, information that is not publically available or readily discernible without discovery. Blitzsafe further reserves the right to amend these claim charts, as well as other information contained in this document and the exhibits attached hereto, pursuant to Patent Local Rules 3-1(g) and 3-6.

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