

IPR2016-01448
PATENT NO. 7,489,786

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. 7,489,786
Issue Date: Feb. 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. IPR2016-01448

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 (July 20, 2016).

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”):

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, -01445, -01449, -01473, -01476, -01533, -01557.
- Petitions for *inter partes* review of the '786 Patent: IPR2016-00421, -0422, -01472, -01477.

IPR2016-00419, -00422, and -00118 have been denied.

The '786 Patent was also 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.

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

Back-up Counsel: Shahar Harel (Reg. No. 73,203)

Electronic Service information: sharel@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: Vincent J. Rubino, III (Reg. No. 68,504)

Electronic Service information: vrubino@brownrudnick.com

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

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

¹ Alfred Fabricant is identified as back-up counsel subject to appropriate *pro hac vice* motion to be filed upon authorization.

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 addresses: plambrianakos@brownrudnick.com; afabricant@brownrudnick.com; sharel@brownrudnick.com; and vrubino@brownrudnick.com

Dated August 10, 2016

/Peter Lambrianakos /
Lead Counsel for Patent Owner

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

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