

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

<b>BLITZSAFE TEXAS, LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>Case No. 2:15-cv-1274-JRG-RSP</b>
	§	<b>LEAD CASE</b>
	§	
<b>HONDA MOTOR CO., LTD.;</b>	§	<b><u>JURY TRIAL DEMANDED</u></b>
<b>AMERICAN HONDA MOTOR CO.,</b>	§	
<b>INC.; HONDA OF AMERICA</b>	§	
<b>MANUFACTURING, INC.; HONDA</b>	§	
<b>MANUFACTURING OF ALABAMA,</b>	§	
<b>LLC; and HONDA MANUFACTURING</b>	§	
<b>OF INDIANA, LLC,</b>	§	
	§	
<b>Defendants.</b>	§	
	§	
	§	

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS  
AND INFRINGEMENT CONTENTIONS**

Plaintiff Blitzsafe Texas, LLC (“Blitzsafe”) hereby makes the following infringement disclosures under the Patent Local Rules with respect to United States Patent Nos. 7,489,786 (“the ’786 patent”) and 8,155,342 (“the ’342 patent”), (collectively, “Blitzsafe Patents”). Blitzsafe’s investigation is ongoing and discovery is in its preliminary stages. Accordingly, these disclosures are based on information available to Blitzsafe at this time. Blitzsafe reserves the right to supplement this disclosure after further discovery from the defendants and non-parties, particularly documents and other discovery regarding the defendants’ accused devices. Blitzsafe also reserves the right to assert additional claims of the Blitzsafe Patents, accuse different products, or find alternative literal and/or equivalent infringing elements in the defendant’s products.

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

**A. ASSERTED CLAIMS**

1. Honda Accused Products

Defendants Honda Motor Co., Ltd., American Honda Motor Co., Inc., Honda of America Manufacturing, Inc., Honda Manufacturing of Alabama, LLC, and Honda Manufacturing of Indiana, LLC (collectively, “Honda”) have infringed and continue to infringe at least the following claims of the Blitzsafe patents in connection with the Honda Accused Products set forth below:

- Claim 1, 2, 4, 5, 6, 8, 10, 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.

2. Acura Accused Products

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

- Claim 1, 2, 4-8, 10, 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, 71, 73-80, 95, 97, 99-103, 106, 109-111, 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. Honda Accused Products

a. '786 Patent

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

2011-2016 Honda Accord

2009-2016 Honda Civic

2010-2016 Honda CR-V

2011-2016 Honda CR-Z

2009-2011 Honda Element

2009-2016 Honda Fit

2015-2016 Honda HR-V

2009-2014 Honda Insight

2011-2016 Honda Odyssey

2009-2016 Honda Pilot

b. '342 Patent:

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

2013-2016 Honda Accord

2012-2016 Honda Civic

2012-2016 Honda CR-V

2013-2016 Honda CR-Z

2009-2011 Honda Element

2012-2016 Honda Fit

2015-2016 Honda HR-V

2012-2014 Honda Insight

2012-2016 Honda Odyssey

2012-2016 Honda Pilot

2. Acura Accused Products

a. '786 Patent:

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

2013-2016 Acura ILX

2009-2016 Acura TL/TLX

2009-2012 Acura RL

2014-2016 Acura RLX

2009-2016 Acura RDX

2009-2016 Acura MDX

2010-2013 Acura ZDX

2011-2014 Acura TSX

b. '342 Patent:

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

2013-2016 Acura ILX

2009-2016 Acura TL/TLX

2009-2012 Acura RL

2014-2016 Acura RLX

2009-2016 Acura RDX

2009-2016 Acura MDX

2010-2013 Acura ZDX

2011-2014 Acura TSX

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 Honda Accused Products and Acura Accused Products cited in the claim charts are representative of the Honda Accused Products and Acura 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.

### **D. LITERAL INFRINGEMENT AND DOCTRINE OF EQUIVALENTS**

Blitzsafe asserts that, under the proper construction of the asserted claims and their claim terms, the limitations of the asserted claims of the Blitzsafe Patents are literally present in the Honda Accused Products and Acura Accused Products as set forth in the claim charts attached hereto as Appendices A–D. Blitzsafe contends that any and all elements found not to be literally

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