

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

<b>BLITZSAFE TEXAS, LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
v.	§	<b>Case No. 2:15-cv-1274-JRG-RSP</b>
	§	<b>LEAD CASE</b>
	§	
<b>HYUNDAI MOTOR COMPANY; HYUNDAI MOTOR AMERICA; HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC; KIA MOTORS CORPORATION; KIA MOTORS AMERICA, INC.; and KIA MOTORS MANUFACTURING GEORGIA, INC.,</b>	§	<b><u>JURY TRIAL DEMANDED</u></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. Hyundai Accused Products

Defendants Hyundai Motor Company, Hyundai Motor America, and Hyundai Motor Manufacturing Alabama, LLC (collectively, “Hyundai”) have infringed and continue to infringe at least the following claims of the Blitzsafe patents in connection with the Hyundai 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.

2. Kia Accused Products

Defendants Kia Motors Corporation, Kia Motors America, Inc., and Kia Motors Manufacturing Georgia, Inc. (collectively, “Kia”) have infringed and continue to infringe at least the following claims of the Blitzsafe patents in connection with the Kia 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. Hyundai Accused Products

#### a. '786 Patent

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

2010-2016 Hyundai Accent

2010-2016 Hyundai Azera

2010-2016 Hyundai Elantra

2013-2016 Hyundai Elantra GT

2010-2016 Hyundai Equus

2010-2016 Hyundai Genesis

2010-2015 Hyundai Genesis Coupe

2010-2016 Hyundai Santa Fe

2010-2016 Hyundai Sonata

2011-2016 Hyundai Sonata Hybrid

2010-2016 Hyundai Tucson

2015 Hyundai Tucson Fuel Cell

2010-2012 Hyundai Veracruz

2012-2016 Hyundai Veloster

#### b. '342 Patent:

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

2015 Hyundai Azera

2014-2016 Hyundai Equus

2015-2016 Hyundai Genesis

2016 Hyundai Santa Fe

2014-2016 Hyundai Sonata

2016 Hyundai Sonata Hybrid

2014-2016 Hyundai Tucson

2016 Hyundai Veloster

2. Kia Accused Products

a. '786 Patent:

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

2014-2015 Kia Cadenza

2010-2016 Kia Forte

2014-2016 Kia Forte 5

2015-2016 Kia K900

2010-2016 Kia Optima

2011-2016 Kia Optima Hybrid

2010-2016 Kia Rio

2010-2016 Kia Rio 5-door

2010-2016 Kia Sedona

2011-2016 Kia Sorento

2010-2016 Kia Soul

2015-2016 Kia Soul EV

2010-2016 Kia Sportage

b. '342 Patent:

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

- 2014-2015 Kia Cadenza
- 2014-2016 Kia Forte
- 2016 Kia Forte 5
- 2015-2016 Kia K900
- 2012-2016 Kia Optima
- 2011-2016 Kia Optima Hybrid
- 2011-2016 Kia Rio
- 2012-2016 Kia Rio 5-door
- 2015-2016 Kia Sedona
- 2011-2016 Kia Sorento
- 2011-2016 Kia Soul
- 2015-2016 Kia Soul EV
- 2011-2016 Kia Sportage

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 Hyundai Accused Products and Kia Accused Products cited in the claim charts are representative of the Hyundai Accused Products and Kia Accused Products. Blitzsafe

PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS

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