

IPR2016-01477  
PATENT NO. 7,489,786

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HYUNDAI MOTOR COMPANY, LTD., HYUNDAI MOTOR AMERICA,  
HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC,  
KIA MOTORS CORPORATION, KIA MOTORS AMERICA, INC.,  
and KIA MOTORS MANUFACTURING GEORGIA, INC.  
Petitioners

v.

BLITZSAFE TEXAS, LLC  
Patent Owner

Patent No. 7,489,786  
Filing Date: December 11, 2002  
Issue Date: February 10, 2009  
Title: AUDIO DEVICE INTEGRATION SYSTEM

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**BLITZSAFE TEXAS, LLC'S  
MANDATORY NOTICES PURSUANT TO  
37 C.F.R. §42.8(a)(2)**

Case No. IPR2016-01477

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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 21, 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 '786 and '342 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, -01449, -01445, -01473, -01533, -01476, -01557.
- Petitions for *inter partes* review of the '786 Patent: IPR2016-00421, -00422, -01448, -01472.

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. Fabricant<sup>1</sup>

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

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<sup>1</sup> 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 11, 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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