

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

American Honda Motor Co., Inc.

v.

Blitzsafe Texas, LLC,
Patent Owner

U.S. Patent No. 8,155,342
Filing Date: June 27, 2006
Issue Date: April 10, 2012
Title: Multimedia Device Integration System

Inter Partes Review No.: IPR2016-01533

**PETITIONER'S MOTION FOR JOINDER
UNDER 35 U.S.C. 315(c) AND 37 C.F.R. §§ 42.22 AND 42.122(b)**

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I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Petitioner moves the Patent Trial and Appeal Board (“Board”) for joinder of this *inter partes* review (Case No. IPR2016-01533, “Honda IPR”) to an earlier *inter partes* review filed by Toyota Motor Corporation (“Toyota”) (Case No. IPR2016-0418, “Toyota IPR”). The Honda IPR is intentionally identical to the Toyota IPR in all substantive aspects. Both seek *inter partes* review of claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109- 111, 113, 115, and 120 (the “Challenged Claims”) of U.S. Patent No. 8,155,342 (Ex. 1001, “the ’342 patent”). Further, the Honda IPR and Toyota IPR rely upon the same analytical framework (e.g., same expert declarant, prior art, and claim charts) in addressing the Challenged Claims. Accordingly, resolving the Honda IPR and Toyota IPR will necessarily involve considering the same issues by all parties and the Board.

Petitioner is filing this petition and joinder motion to ensure that the instituted trial is completed in the event that the petitioner in the Toyota IPR reaches a settlement with the Patent Owner. Joinder of these proceedings also presents the best opportunity to secure the just, speedy, and inexpensive resolution of the related proceedings without any prejudice to the Patent Owner. This includes consolidated filings and discovery and eliminating the duplicate hearings and briefing that would surely accompany separate proceedings. Joinder should also provide for case management efficiencies for the Board.

Petitioner has notified counsel for Toyota and Blitzsafe Texas, LLC (“Blitzsafe”) regarding the subject of this motion. Counsel for Blitzafe has indicated that they oppose this motion. As of the filing of this motion, counsel for Toyota indicated that Toyota is still considering whether or not it is opposed to the motion.

In light of the similarities of the proceedings and the efficiencies that can be realized via joinder, Petitioner respectfully requests that the Board join the Toyota IPR and Honda IPR.

II. BACKGROUND

Toyota filed a petition requesting *inter partes* review of the ’342 patent on December 30, 2015. Toyota IPR, Paper 1. A decision granting institution of that petition was granted on July 8, 2016. Paper 13.

The Toyota IPR and Honda IPR involve different petitioner groups and real parties-in-interest. *Compare* Toyota IPR, Paper 1 at 1 *with* Honda IPR, Paper 1 at 1 (identifying real parties-in-interest). However, the parties are defendants in numerous different infringement lawsuits asserting the ’342 patent and one other patent filed by the Patent Owner in the U.S. District Court for the Eastern District of Texas. *See* Toyota IPR, Paper 1 at 1-2; Honda IPR, Paper 1 at 1-3 (listing related matters). The other patent asserted by the Patent Owner is U.S. Patent No. 7,489,786, for which there are several other pending IPR proceedings. A summary

of the IPR proceedings related to the Patent Owner's Patents is provided below in Tables 1 and 2.

Table 1: Related Proceedings

Case	Date Filed	Petitioner	Patent	Challenged Claims
IPR2016-00118	10/30/2015	Unified Patents	'342	1-25, 49, 73, 97, 120, 121
IPR2016-00418	12/30/2015	Toyota	'342	49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, 120
IPR2016-00419	12/30/2015	Toyota	'342	49-57, 62-64, 66,
IPR2016-00421	12/30/2015	Toyota	'786	1, 2, 4-8, 10, 13,
IPR2016-00422	12/30/2015	Toyota	'786	1, 2, 4-8, 10, 13,
IPR2016-01445	07/20/2016	Volkswagen	'342	49-57, 62-64, 66,
IPR2016-01448	07/20/2016	Volkswagen	'786	1, 2, 4-8, 13, 14,
IPR2016-01449	07/20/2016	Volkswagen	'342	49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, 120
IPR2016-01472	07/21/2016	Honda	'786	1, 5-8, 10, 14, 57, 60-62, 64, 65
IPR2016-01473	07/21/2016	Honda	'342	49, 53, 54, 56, 57, 62, 66, 70, 73, 77, 78
IPR2016-01477	07/21/2016	Hyundai /Kia	'786	1, 5-8, 10, 14, 23, 24, 57, 60-62, 64-65

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