

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

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

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*Inter Partes* Review No.: (Unassigned)

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**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,155,342  
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-100, ET SEQ.**

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## EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 8,155,342 (“the ’342 patent”)
1002	U.S. Patent Application Publication No. 2006/0181963 (“Clayton”)
1003	U.S. Provisional Application No. 60/651,963 (“Clayton Provisional”)
1004	U.S. Patent No. 6,559,773 (“Berry”)
1005	U.S. Patent Application Publication No. 2003/0215102 (“Marlowe”)
1006	U.S. Patent No. 6,421,305 (“Gioscia”)
1007	Claim Construction Ruling in Marlowe Patent Holdings LLC v. DICE Electronics, LLC et al., 3:10-cv-01199 (D. NJ) and Marlowe Patent Holdings LLC v. Ford Motor Company, 3:10-cv-07044 (D. NJ)
1008	U.S. Patent Application No. 11/475,847 (“the ’847 application”)
1009	U.S. Patent Application No. 11/071,667 (“the ’667 application”)
1010	U.S. Patent Application No. 10/732,909 (“the ’909 application”)
1011	U.S. Patent Application No. 10/316,961 (“the ’961 application”)
1012	Highlighted ’342 Patent (Showing the New Matter)
1013	Plaintiff’s Disclosure of Asserted Claims and Infringement Contentions, served in Blitzsafe Texas, LLC v. Toyota Motor Corp. et al., 2-15-cv-01277 (E.D. TX)
1014	File History of the ’342 Patent
1015	1999 ID3v2.3 Metadata Standard (1999)
1016	Declaration of Dr. Thomas Matheson
1017	Canadian Patent Application Publication No. CA 2347648 (“Kandler”)
1018	International Publication No. WO 01/67266 A1 (“Lau”)
1019	U.S. Patent Application Publication No. 2001/0028717 (“Ohmura”)
1020	Bluetooth ESDP for UPnP (2001)
1021	Universal Plug and Play Device Architecture (2000)
1022	IPR2016-00118, Paper 19 (“IPR ’118”)
1023	IPR2016-00418, Paper 13 (“IPR ’418”)

## **I. INTRODUCTION**

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, Petitioners Hyundai Motor Company (“HMC”), Hyundai Motor America (“HMA”), Hyundai Motor Manufacturing Alabama, LLC (“HMMA”), Kia Motors Corporation (“KMC”), Kia Motors America, Inc. (“KMA”), and Kia Motors Manufacturing Georgia, Inc. (“KMMG”) (collectively “Petitioners”) respectfully request *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 of U.S. Patent No. 8,155,342 (Ex. 1001, “the ’342 patent”), which was filed on June 27, 2006 and issued on April 10, 2012 to Ira Marlowe, and is currently assigned to Blitzsafe Texas, LLC. (“Blitzsafe” or “Patent Owner”) according to the U.S. Patent and Trademark Office assignment records. There is a reasonable likelihood that Petitioner will prevail with respect to at least one of the claims challenged in this Petition.

## **II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)**

### **A. REAL PARTY-IN-INTEREST UNDER 37 C.F.R. § 42.8(b)(1)**

Hyundai Motor Company (“HMC”), Hyundai Motor America (“HMA”), Hyundai Motor Manufacturing Alabama, LLC (“HMMA”), Kia Motors Corporation (“KMC”), Kia Motors America, Inc. (“KMA”), and Kia Motors Manufacturing Georgia, Inc. (“KMMG”) (collectively, “Petitioners”) are the real parties-in-interest.

## **B. RELATED MATTERS UNDER 37 C.F.R. § 42.8(b)(2)**

The '342 patent is subject to the following pending actions: *Blitzsafe Texas, LLC v. Nissan Motor Co., Ltd. et al.*, 2-15-cv-01276, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Toyota Motor Corp. et al.*, 2:15-cv-01277, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Volkswagen Group of Am., Inc. et al.*, 2-15-cv-01278, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Hyundai Motor Co. et al.*, 2-15-cv-01275, July 16, 2015 (E.D. TX); *Blitzsafe Texas, LLC v. Honda Motor Co., Ltd. et al.*, 2-15-cv-01274, July 16, 2015 (E.D. TX); IPR2016-00118, IPR2016-00418 and IPR2016-00419.

U.S. Patent No. 7,489,786 (the "786 patent"), a parent patent to the '342 patent, is also at issue in the above-listed district court cases, and was previously the subject of the following litigations: *Marlowe Patent Holdings LLC v. DICE Electronics, LLC et al.*, 3:10-cv-01199 (D. NJ); and *Marlowe Patent Holdings LLC v. Ford Motor Company*, 3:10-cv-07044 (D. NJ). Both of these cases settled by June 2015. In addition, claims of the '786 patent are presently undergoing inter partes review in Case No. IPR2015-00421.

## **C. LEAD AND BACK-UP COUNSEL**

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