### UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

# NISSAN NORTH AMERICA, INC. and NISSAN MOTOR CO., LTD. Petitioners

v.

# BLITZSAFE TEXAS, LLC Patent Owner

Patent No. 8,155,342 Filing Date: June 27, 2006 Issue Date: April 10, 2012

Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

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

Case No. IPR2016-01560



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 (September 7, 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. 8,155,342 ("the '342 Patent"):

Patent Owner asserted the '342 Patent and the related U.S. Patent No. 7,489,786 ("the '786 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 '342 and '786 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, -01445, -01449, -01473, -01476, -01533, -01557.
- Petitions for *inter partes* review of the '786 Patent: IPR2016-00421,
   -00422, -01448,-01472,-01477.

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., 3:10cv-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:

<u>Lead Counsel</u>: Peter Lambrianakos (Reg. No. 58,279)

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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.



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### 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: September 28, 2016 / Peter Lambrianakos Lead Counsel for Patent Owner

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