

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

BLITZSAFE TEXAS, LLC,	§	
	§	
	§	
Plaintiff,	§	
	§	Case No. 2:15-cv-1274-JRG-RSP
v.	§	LEAD CASE
	§	
TOYOTA MOTOR CORPORATION;	§	<u>JURY TRIAL DEMANDED</u>
TOYOTA MOTOR SALES U.S.A., INC.;	§	
TOYOTA MOTOR MANUFACTURING	§	
TEXAS, INC.; TOYOTA MOTOR	§	
MANUFACTURING KENTUCKY, INC.;	§	
and TOYOTA MOTOR	§	
MANUFACTURING MISSISSIPPI, INC.,	§	
	§	
Defendants.	§	
	§	
	§	
	§	

**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. Toyota Accused Products

Defendants Toyota Motor Corporation, Toyota Motor Sales U.S.A., Inc., Toyota Motor Manufacturing, Texas, Inc., Toyota Motor Manufacturing Kentucky, Inc., and Toyota Motor Manufacturing Mississippi, Inc. (collectively, “Toyota”) have infringed and continue to infringe at least the following claims of the Blitzsafe Patents in connection with the Toyota Accused Products set forth below:

- Claims 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, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, and 120 of the '342 patent.

2. Lexus Accused Products

Toyota has infringed and continues to infringe at least the following claims of the Blitzsafe patents in connection with the Lexus 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, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, 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. Toyota Accused Products
 - a. '786 Patent

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

- 2010-2016 Toyota 4Runner
- 2011-2016 Toyota Avalon
- 2010-2016 Toyota Camry
- 2011-2016 Toyota Corolla
- 2011-2016 Toyota Highlander
- 2010-2016 Toyota Land Cruiser
- 2012-2016 Toyota Prius
- 2012-2016 Toyota RAV4
- 2010-2016 Toyota Sequoia
- 2011-2016 Toyota Sienna
- 2012-2016 Toyota Tacoma
- 2010-2016 Toyota Tundra
- 2010-2016 Toyota Venza

- b. '342 Patent:

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

- 2010-2016 Toyota 4Runner
- 2011-2016 Toyota Avalon

2010-2016 Toyota Camry
2011-2016 Toyota Corolla
2011-2016 Toyota Highlander
2010-2016 Toyota Land Cruiser
2012-2016 Toyota Prius
2012-2016 Toyota RAV4
2010-2016 Toyota Sequoia
2011-2016 Toyota Sienna
2012-2016 Toyota Tacoma
2010-2016 Toyota Tundra
2010-2016 Toyota Venza

2. Lexus Accused Products

a. '786 Patent:

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

2010-2016 Lexus CT
2010-2016 Lexus IS
2010- 2012 Lexus HS
2010-2016 Lexus GS
2010-2016 Lexus LS
2015-2016 Lexus RC
2012 Lexus LFA

2015-2016 Lexus NX

2010-2016 Lexus GX

2010-2016 Lexus LX

2009 Lexus CT, Lexus IS, Lexus HS, Lexus ES, Lexus GS, Lexus LS, Lexus RX,
Lexus GX, Lexus LX with Lexus Interface Kit for iPod

b. '342 Patent:

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

2010-2016 Lexus CT

2010-2016 Lexus IS

2010- 2012 Lexus HS

2010-2016 Lexus GS

2010-2016 Lexus LS

2015-2016 Lexus RC

2012 Lexus LFA

2015-2016 Lexus NX

2010-2016 Lexus GX

2010-2016 Lexus LX

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