

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SUBARU OF AMERICA, INC.; MAZDA MOTOR OF AMERICA,
INC.; VOLVO CARS OF NORTH AMERICA, LLC; MITSUBISHI
ELECTRIC CORPORATION; MITSUBISHI MOTORS
CORPORATION; DAIMLER AG; BMW OF NORTH AMERICA, LLC

Petitioners

v.

BLITZSAFE TEXAS, LLC

Patent Owner

Patent No. 8,155,342

Issued: Apr. 10, 2012

Filed: Jun. 27, 2006

Inventor: Ira Marlowe

Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

Inter Partes Review No.: IPR2018-00090

PETITION FOR *INTER PARTES* REVIEW

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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)

I. INTRODUCTION

This Petition, and the references and grounds included in it, are substantively identical to those included in the Toyota Petition (IPR2016-00418) (the “Toyota IPR”). The sole exception is that Petitioners here adopt the claim constructions applied by the Board in the Toyota IPR and related IPRs. The Toyota IPR proceeded through final hearing and was ready for determination and preparation of the final written decision.

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, 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)

The following is a list of Petitioners (and listed out of an abundance of caution, entities as real parties-in-interest for each party in parentheses): Subaru of

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