

Appendix B
Claim Chart for US Patent No. 8,155,342 Against Accused Infotainment Systems of BMW Automob

Claim	Support
	<p style="text-align: center;">Headunit High</p> <p style="text-align: center;">5. Functions</p> <p>Bluetooth audio streaming</p> <p>The Bluetooth audio streaming introduced with the Combox, a Bluetooth audio connection between a cell phone and end device, was fully integrated into the Headunit High.</p> <p>As with CIC the standard audio video remote control profile AVRCP 1.3 is used for the introduction of the Headunit High. This means that the metadata such as artist, album, track, etc. can still be displayed. "Browsing" will only become available with version 1.4 (AVRCP 1.4 is planned for later in production as an enhancement to the current version).</p> <p><i>See, e.g.,</i> Ex. E (2013 Headunit High Technical Training), at p. 26, 67.⁵</p> <p><i>See also</i> https://youtu.be/UXBobkYjk1c</p>
[49A] an integration subsystem in communication with a car audio/video system; and	<p>Each BMW multimedia device integration system includes, among other things, an integration subsystem communicating audio/video from portable devices via the Bluetooth connection to the car audio/video integration subsystem, which comprises at least the hardware shown below and the necessary software or executed thereon, including at least a Bluetooth module, microcontroller, and memory modules su modules, is in communication with the car audio/video system. The integration subsystem channels a car audio/video system from a portable device (such as an iPod, iPhone or other smart device).</p> <p>The specific location of the claimed "integration subsystem" will be ascertainable upon receipt of disc including but not limited to the inspection of source code. Upon information and belief, each BMW in is in communication with a car audio/video system.</p> <p>For example, the claimed integration subsystem may be located in the "Combox" (or may be the entire other similar component, in the Head Unit (or may be the entire Head Unit), and/or a combination of either/or the Combox and the Head Unit, or may be located in the iPod interface kit depending upon t</p>

⁵ Blitzsafe has produced Ex. E, 2013 Headunit High Technical Training, simultaneously with these Infringement Contentions as a document numbers BS-BMW-0000555. All pin-cites are to document pages.

Appendix B
Claim Chart for US Patent No. 8,155,342 Against Accused Infotainment Systems of BMW Automob

Claim	Support																																								
	<table border="1"> <thead> <tr> <th style="text-align: center;">Index</th> <th style="text-align: center;">Explanation</th> </tr> </thead> <tbody> <tr><td>1</td><td>Dynamic Stability Control (DSC)</td></tr> <tr><td>2</td><td>Power distribution box, front</td></tr> <tr><td>3</td><td>Front Electronic Module (FEM)</td></tr> <tr><td>4</td><td>Power distribution box, luggage compartment</td></tr> <tr><td>5</td><td>DC/DC converter</td></tr> <tr><td>6</td><td>Combox</td></tr> <tr><td>7</td><td>Bluetooth antenna in wiring harness</td></tr> <tr><td>8</td><td>AUX-In connection with USB audio interface in center console</td></tr> <tr><td>9</td><td>Integrated Chassis Management (ICM)</td></tr> <tr><td>10</td><td>Controller (CON)</td></tr> <tr><td>11</td><td>Integrated automatic heating / air conditioning</td></tr> <tr><td>12</td><td>IHKA operating facility</td></tr> <tr><td>13</td><td>Audio operating facility</td></tr> <tr><td>14</td><td>USB connection in glove box</td></tr> <tr><td>15</td><td>Car Information Computer</td></tr> <tr><td>16</td><td>Central information display (CID)</td></tr> <tr><td>17</td><td>Steering column switch cluster (SZL)</td></tr> <tr><td>18</td><td>Microphone</td></tr> <tr><td>19</td><td>Instrument cluster (KOMBI)</td></tr> </tbody> </table>	Index	Explanation	1	Dynamic Stability Control (DSC)	2	Power distribution box, front	3	Front Electronic Module (FEM)	4	Power distribution box, luggage compartment	5	DC/DC converter	6	Combox	7	Bluetooth antenna in wiring harness	8	AUX-In connection with USB audio interface in center console	9	Integrated Chassis Management (ICM)	10	Controller (CON)	11	Integrated automatic heating / air conditioning	12	IHKA operating facility	13	Audio operating facility	14	USB connection in glove box	15	Car Information Computer	16	Central information display (CID)	17	Steering column switch cluster (SZL)	18	Microphone	19	Instrument cluster (KOMBI)
Index	Explanation																																								
1	Dynamic Stability Control (DSC)																																								
2	Power distribution box, front																																								
3	Front Electronic Module (FEM)																																								
4	Power distribution box, luggage compartment																																								
5	DC/DC converter																																								
6	Combox																																								
7	Bluetooth antenna in wiring harness																																								
8	AUX-In connection with USB audio interface in center console																																								
9	Integrated Chassis Management (ICM)																																								
10	Controller (CON)																																								
11	Integrated automatic heating / air conditioning																																								
12	IHKA operating facility																																								
13	Audio operating facility																																								
14	USB connection in glove box																																								
15	Car Information Computer																																								
16	Central information display (CID)																																								
17	Steering column switch cluster (SZL)																																								
18	Microphone																																								
19	Instrument cluster (KOMBI)																																								
	<p>4.4. Hands-free system with USB interface</p> <p>A telephone-supported headunit is used in conjunction with radio (standard equipment) in the F30. With this, no additional control unit is required in order to provide telephone functions in the vehicle.</p> <p>In vehicles with Navigation System (option 609) a Combox is installed as well as the headunit to achieve the telephone function. In this case, the microphone, the Bluetooth antenna and the AUX-In connection with USB audio interface are connected not to the headunit, but to the Combox.</p> <p>See, e.g., Ex. C (BMW F30 Entertainment and Communication Technical Training), at 13-14, 23.</p> <p>As another example, the “main processor” in certain head units, such as the example shown below, m “integration subsystem,” or, alternatively, the entire head unit may be the “integration subsystem.”</p>																																								

Appendix B
Claim Chart for US Patent No. 8,155,342 Against Accused Infotainment Systems of BMW Automob

Claim	Support																																																																								
<p>52. The system of claim 51, wherein said second wireless interface is positioned within the portable device.</p>	<p>Portable devices, such as iPhones, iPads, iPods, Android phones and other smart, portable devices, including interfaces within the portable device.</p> <div style="border: 1px solid gray; padding: 10px; margin: 10px 0;"> <p style="text-align: center;">iOS: Supported Bluetooth profiles</p> <p>iPhone, iPad, and iPod touch support multiple Bluetooth profiles with the latest version of iOS. You can learn the differences in Bluetooth-profile support from one device to the next.</p> <p>The following table lists supported Bluetooth profiles by device for the latest version of iOS.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Device</th> <th>Hands-Free Profile (HFP 1.6)</th> <th>Phone Book Access Profile (PBAP)</th> <th>Advanced Audio Distribution Profile (A2DP)</th> <th>Audio/Video Remote Control Profile (AVRCP 1.4)</th> <th>Personal Area Network Profile (PAN)</th> <th>Human Interface Device Profile (HID)</th> <th>Message Access Profile (MAP)</th> </tr> </thead> <tbody> <tr> <td>iPhone 4 and later</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> </tr> <tr> <td>iPhone 3GS</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> </tr> <tr> <td>iPhone 3G</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Original iPhone</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> <tr> <td>iPad 2 and later</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> </tr> <tr> <td>iPad (1st generation)</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> </tr> <tr> <td>iPod touch (4th generation and later)</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> </tr> <tr> <td>iPod touch (2nd and 3rd generation)</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">✓</td> <td style="text-align: center;">-</td> </tr> </tbody> </table> </div>	Device	Hands-Free Profile (HFP 1.6)	Phone Book Access Profile (PBAP)	Advanced Audio Distribution Profile (A2DP)	Audio/Video Remote Control Profile (AVRCP 1.4)	Personal Area Network Profile (PAN)	Human Interface Device Profile (HID)	Message Access Profile (MAP)	iPhone 4 and later	✓	✓	✓	✓	✓	✓	✓	iPhone 3GS	✓	✓	✓	✓	✓	✓	-	iPhone 3G	✓	✓	✓	✓	✓	-	-	Original iPhone	✓	✓	-	-	-	-	-	iPad 2 and later	✓	-	✓	✓	✓	✓	-	iPad (1st generation)	-	-	✓	✓	✓	✓	-	iPod touch (4th generation and later)	✓	-	✓	✓	✓	✓	-	iPod touch (2nd and 3rd generation)	-	-	✓	✓	✓	✓	-
Device	Hands-Free Profile (HFP 1.6)	Phone Book Access Profile (PBAP)	Advanced Audio Distribution Profile (A2DP)	Audio/Video Remote Control Profile (AVRCP 1.4)	Personal Area Network Profile (PAN)	Human Interface Device Profile (HID)	Message Access Profile (MAP)																																																																		
iPhone 4 and later	✓	✓	✓	✓	✓	✓	✓																																																																		
iPhone 3GS	✓	✓	✓	✓	✓	✓	-																																																																		
iPhone 3G	✓	✓	✓	✓	✓	-	-																																																																		
Original iPhone	✓	✓	-	-	-	-	-																																																																		
iPad 2 and later	✓	-	✓	✓	✓	✓	-																																																																		
iPad (1st generation)	-	-	✓	✓	✓	✓	-																																																																		
iPod touch (4th generation and later)	✓	-	✓	✓	✓	✓	-																																																																		
iPod touch (2nd and 3rd generation)	-	-	✓	✓	✓	✓	-																																																																		

Appendix B
Claim Chart for US Patent No. 8,155,342 Against Accused Infotainment Systems of BMW Automobiles

Claim	Support
	<p>See, e.g., Ex. F (Apple iPhone Supported Bluetooth Profiles).⁶</p> <p>See, e.g., http://developer.android.com/guide/topics/connectivity/bluetooth.html (discussing Bluetooth on the Android platform).</p>  <p>Source: http://www.techinsights.com/blog-teardown/blog.aspx?blogmonth=12&blogyear=2014&blogpostid=12345</p>
53. The system of claim 49, wherein said integration subsystem receives a control command	<p>The integration subsystem [see support for element 49[A]] “receives a control command issued at the system in a format incompatible with the portable device, processes the control command into a format compatible with the portable device, and dispatches the processed control command to the portable device thereby.” More specifically, once a portable device is connected, commands are received by the integration subsystem from the car audio/video system, where they are processed and converted from a format understandable to the car audio/video system and associated BMW protocols (i.e., a format incompatible with the portable device) into formatted commands that are compatible with the portable device (i.e., converted into Bluetooth, or other device-specific protocols understandable to the portable device). These formatted commands are then transmitted to the portable device.</p>

⁶ Blitzsafe has produced Ex. F, Apple iPhone Supported Bluetooth Profiles, simultaneously with these Infringement Contentions as a defense to the claims. The production numbers BS-BMW-0000657.

Appendix B
Claim Chart for US Patent No. 8,155,342 Against Accused Infotainment Systems of BMW Automob

Claim	Support
<p>issued at the car audio/video system in a format incompatible with the portable device, processes the control command into a formatted command compatible with the portable device, and dispatches the processed control command to the portable device for execution thereby.</p>	<p>portable device via the first and second wireless interfaces (i.e., the Bluetooth interface of the multim integration system and one or more Bluetooth interfaces in communication with and part of the porta they are executed by the portable device. At least the microcontroller of the integration subsystem (a microcontrollers on one or more circuit boards of the device integration system) executes pre-program perform at least a portion of these functions. It is believed that this code is stored in onboard flash an modules (such as flash memory modules), and/or is contained within firmware elsewhere in the integ (such as within the microcontroller itself).</p> <div style="border: 1px solid gray; padding: 10px; margin-top: 20px;"> <p>Bluetooth audio</p> <p>At a glance</p> <ul style="list-style-type: none"> ▶ Music files on external devices such as audio devices or mobile phones can be played back via Bluetooth. </div>

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.