


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

In these Infringement Contentions, Blitzsafe contends that at least the following claims of U.S. Patent No. 8,155,342 (the '342 patent) identified below are infringed by the infotainment systems in the identified BMW automobiles, including those sold under the BMW and MINI brands. Blitzsafe does not concede that any claims of the '342 patent that are not listed below are not infringed by the identified BMW and MINI automobiles. Moreover, the citations to certain documents and other information below are intended to be exemplary only and in no way form a limitation on Blitzsafe from citing or relying on additional documents, information, source code, and/or testimony at a later time. These contentions are based on the nature, and an analysis of BMW's products, internal documentation, source code, and/or testimony from relevant witnesses may accurately describe the infringing features of its accused products. Accordingly, Blitzsafe reserves the right to supplement, correct, and/or amend these contentions once such additional information is made available to Blitzsafe. Furthermore, Blitzsafe reserves the right to supplement, correct, modify, and/or amend these contentions: as discovery in this case progresses; in view of the Court's claim construction order(s); in view of any positions taken by BMW, including but not limited to positions on claim construction, invalidity, and infringement; and in connection with the preparation and exchange of expert reports.

Claim	Support
49[P]. A multimedia device integration system, comprising:	Each accused BMW infotainment system includes a multimedia device integration system that supports integration of audio/video devices such as freely lying or docked smartphones and other smart devices as well as MP3 players and iPhones playing MP3 files). BMW multimedia device integration systems also support device integration of smartphones and other smart devices (e.g., iPods and iPhones) for playing audio streamed over the Internet, such as the Aha and iHeart applications and via online radio stations such as Pandora. <div style="border: 1px solid gray; padding: 10px; margin-top: 10px;"> <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>



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<p>[49D] said integration subsystem ... instructs the portable device to play the audio file in response to a user selecting the audio file using controls of the car</p>	<div style="text-align: center;">  </div> <p>Each BMW infotainment system allows a user to input commands via buttons and controls of the car a to: (i) select a track or album; (ii) fast forward and reverse a track; and (iii) play and pause a track. Wh audio file to play using buttons and/or controls of the car audio/video system, the integration subsystem portable device to play the audio file. Audio generated by the portable device is received by the integ the first and second wireless interfaces (i.e., a Bluetooth interface of the car audio/video system and a communication with and part of the portable device). The audio generated by the portable device is t car's speakers.</p>

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audio/video system, and receives audio generated by the portable device over said wireless communication link for playing on the car audio/video system.	<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.

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	<p>Playback</p> <p>General information</p> <ul style="list-style-type: none"> ▶ The display of music track information depends on the device. <li style="border: 2px solid red;">▶ Operation can takes place on the device or iDrive. ▶ Playback is interrupted when data is exchanged via a mobile phone connected via Bluetooth. <p>Starting playback</p> <ol style="list-style-type: none"> 1. Connect the device. 2. "CD/Multimedia" 3. "External devices" 4.  Select the symbol.  <ol style="list-style-type: none"> <li style="border: 2px solid red;">5. Select the desired track from the list, if necessary.

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	<div style="border: 1px solid gray; padding: 10px;"> <p>Playback menu</p> <p>Depending on the particular device, some of the functions may not be available.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #d9e1f2;"> <th style="text-align: left;">Symbol</th> <th style="text-align: left;">Function</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">▷</td> <td>Next track Fast forward: press and hold the symbol.</td> </tr> <tr> <td style="text-align: center;">◁</td> <td>Previous music track Reverse: press and hold the symbol.</td> </tr> </tbody> </table> </div> <p>See, e.g., Ex. A (2011 BMW 3-series Owner's Manual), at p. 213, 215, 216.</p>	Symbol	Function	▷	Next track Fast forward: press and hold the symbol.	◁	Previous music track Reverse: press and hold the symbol.
Symbol	Function						
▷	Next track Fast forward: press and hold the symbol.						
◁	Previous music track Reverse: press and hold the symbol.						

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