

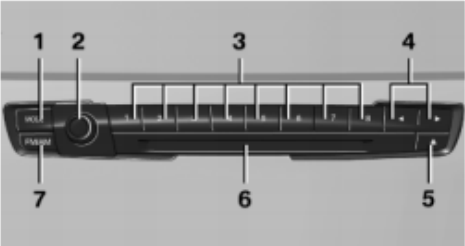
Appendix A
Claim Chart for US Patent No. 7,489,786 Against Accused Infotainment Systems of BMW Automobiles

In these Infringement Contentions, Blitzsafe contends that at least the following claims of U.S. Patent No. 7,489,786, identified below are infringed by the infotainment systems in the identified BMW automobiles, including those sold under the identified BMW brands. Blitzsafe does not concede that any claims of the '786 patent that are not listed below are not infringed by the identified BMW automobiles. Moreover, the citations to certain documents and other information below are intended to be exemplary only and in no way limit 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. These contentions accurately describe the infringing features of its accused products. Accordingly, Blitzsafe reserves the right to supplement, amend, 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 order(s); in view of any positions taken by BMW, including but not limited to positions on claim construction, infringement; and in connection with the preparation and exchange of expert reports.



| Claim | Support |
|--|---|
| 1[P]. An audio device integration system comprising: | Each accused BMW infotainment system includes a device integration system supports docking integration of devices such as freely lying or docked smartphones and other smart devices as well as MP3 players (e.g., iPods, MP3 files). BMW infotainment systems also support device integration of smartphones and other smart devices (e.g., iPhones) for playing audio streamed over the Internet, such as via the Aha and iHeart applications and stations such as Pandora. |

Appendix A

Claim Chart for US Patent No. 7,489,786 Against Accused Infotainment Systems of BMW Automob

| Claim | Support |
|-------|--|
| | <p data-bbox="444 737 581 772">Controls</p>  <ul data-bbox="444 1050 876 1318" style="list-style-type: none">1 Change entertainment sources2 Volume, on/off3 Programmable memory buttons or radio station buttons4 Change station/track5 Eject CD/DVD6 CD/DVD drive7 Change wave band |
























Appendix A
Claim Chart for US Patent No. 7,489,786 Against Accused Infotainment Systems of BMW Automob

| Claim | Support | | | | | | | | | | |
|---|------------------------------|---------|--|-------------|--|---------------------|--|------------------------------|--|-----------------|---|
| <p style="text-align: center;">Entertainment CD/multimedia</p> <p>Deleting the music collection</p> <ol style="list-style-type: none"> "CD/Multimedia" "Music collection" Open "Options". "Delete music collection" <p>External devices</p> <p>At a glance</p> <table border="1"> <thead> <tr> <th>Symbol</th> <th>Meaning</th> </tr> </thead> <tbody> <tr> <td></td> <td>AUX-IN port</td> </tr> <tr> <td></td> <td>USB audio interface</td> </tr> <tr> <td></td> <td>Mobile phone audio interface</td> </tr> <tr> <td></td> <td>Bluetooth audio</td> </tr> </tbody> </table> <p>AUX-IN port</p> <p>At a glance</p> <ul style="list-style-type: none"> For connecting audio devices, e.g., MP3 player. The sound is output on the vehicle loudspeakers. Recommendation: use medium tone and volume settings on the audio device. The tone depends on the quality of the audio files. <p>Connecting</p>  <p>The AUX-IN port is located in the center armrest. Connect the headphones or line-out connector of the device to the jack plug.</p> <p style="text-align: center;">210 Online Edition for Part no. 01 40 2 608 633 - 11 09 490</p> | Symbol | Meaning | | AUX-IN port | | USB audio interface | | Mobile phone audio interface | | Bluetooth audio | <p style="text-align: center;">CD/multimedia</p> <p>Playback</p> <ol style="list-style-type: none"> Connect the audio device, switch it on and select a track on the audio device. "CD/Multimedia" If necessary, "External devices". "AUX front" <p>The sound is played back on the vehicle loudspeakers.</p> <p>Volume</p> <p>The volume of the sound output is dependent on the audio device. If this volume differs markedly from the volume of the other audio sources, it is advisable to adjust the volumes.</p> <p>Adjusting the volume</p> <ol style="list-style-type: none"> "CD/Multimedia" If necessary, "External devices". "AUX front" "Volume"  <ol style="list-style-type: none"> Turn the controller until the desired volume is set and press the controller. <p>USB audio interface/mobile phone audio interface</p> <p>At a glance</p> <p>It is possible to connect external audio devices. Operation can be performed via iDrive. The sound is output on the vehicle loudspeakers.</p> <p style="text-align: center;">Online Edition for Part no. 01 40 2 608 633 - 11 09 490</p> |
| Symbol | Meaning | | | | | | | | | | |
| | AUX-IN port | | | | | | | | | | |
| | USB audio interface | | | | | | | | | | |
| | Mobile phone audio interface | | | | | | | | | | |
| | Bluetooth audio | | | | | | | | | | |

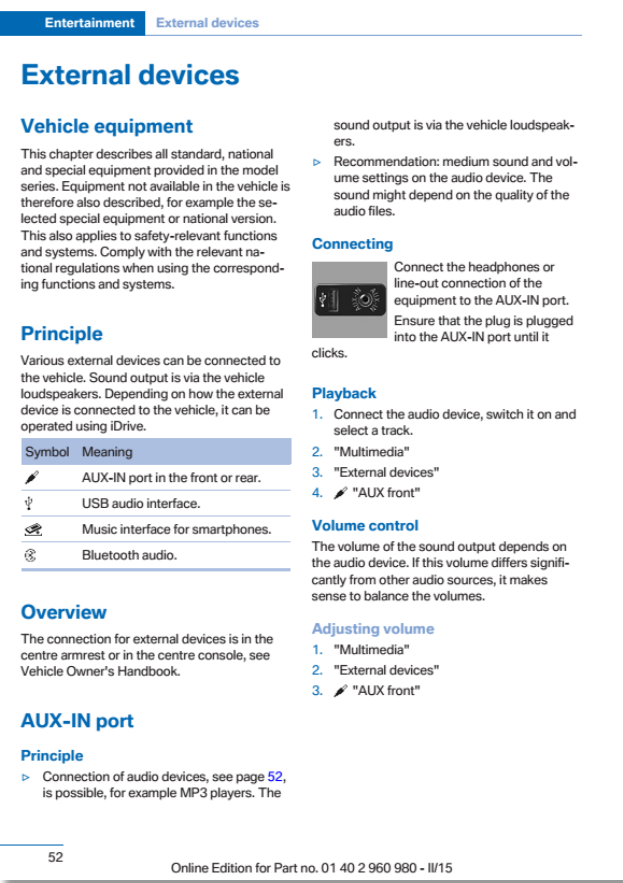
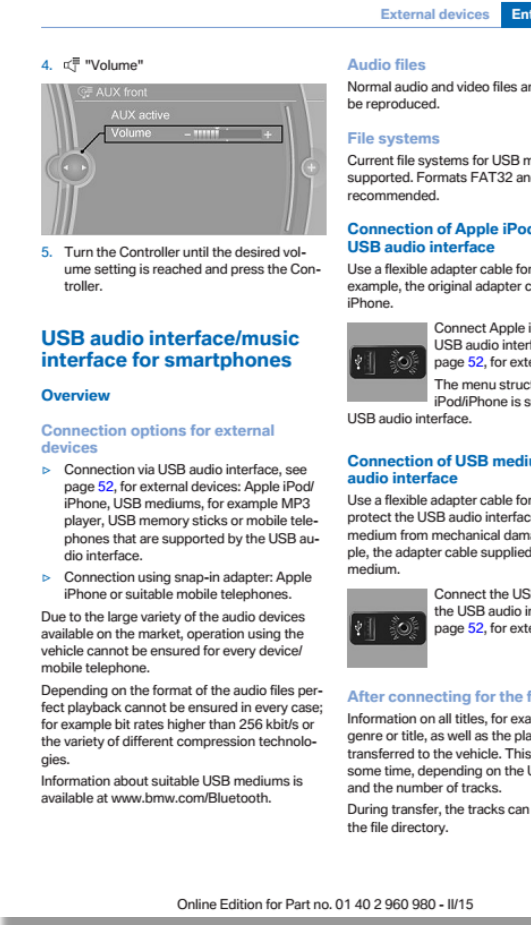
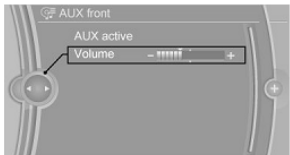
See, e.g., Ex. A (2011 BMW 3-series Owner's Manual), at p. 190, 210-211.¹

¹ Blitzsafe has produced Ex. A, 2011 BMW 3-series Owner's Manual, simultaneously with these Infringement Contentions as a document with identification numbers BS-BMW-0000001. All pin-cites are to manual pages.

Appendix A
Claim Chart for US Patent No. 7,489,786 Against Accused Infotainment Systems of BMW Automob

| Claim | Support | | | | | | | | | | | | | | | | |
|---|--|------------------|----------|---|---|---|---------------------------------|---|-----------------------|---|---------------------|---|-----------------------------|---|------------------|---|---------------|
| | <div style="border: 1px solid black; padding: 10px;"> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black;"> Entertainment General </div> <h2 style="margin-top: 10px;">General</h2> <div style="display: flex;"> <div style="flex: 1;"> <h3>Vehicle equipment</h3> <p>This chapter describes all standard, national and special equipment provided in the model series. Equipment not available in the vehicle is therefore also described, for example the selected special equipment or national version. This also applies to safety-relevant functions and systems. Comply with the relevant national regulations when using the corresponding functions and systems.</p> </div> <div style="flex: 1;"> <h3>Sound output</h3> <h4>Switching on</h4>  <p>With the ignition switched off: press button.</p> <h4>Muting</h4>  <p>With the ignition switched on, or engine running: press button.</p> </div> </div> <h3>Control functions</h3> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Press the button</th> <th style="text-align: left;">Function</th> </tr> </thead> <tbody> <tr> <td></td> <td>Press: switch sound output on/off. Turn: set volume.</td> </tr> <tr> <td></td> <td>Switches entertainment sources.</td> </tr> <tr> <td></td> <td>Change station/track.</td> </tr> <tr> <td></td> <td>Favourites buttons.</td> </tr> <tr> <td></td> <td>Traffic information on/off.</td> </tr> <tr> <td></td> <td>Change waveband.</td> </tr> <tr> <td></td> <td>Eject CD/DVD.</td> </tr> </tbody> </table> <div style="margin-top: 10px;"> <h3>Changing entertainment source</h3> <p>MODE Every time you press the button it switches between radio mode and the most recently used entertainment source.</p> <ul style="list-style-type: none"> > Radio, see page 38 > CD/DVD, see page 45. > Music collection, see page 61. > External devices, see page 52. > Television, TV, see page 67. </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> 34 Online Edition for Part no. 01 40 2 960 980 - II/15 </div> </div> | Press the button | Function |  | Press: switch sound output on/off. Turn: set volume. |  | Switches entertainment sources. |  | Change station/track. |  | Favourites buttons. |  | Traffic information on/off. |  | Change waveband. |  | Eject CD/DVD. |
| Press the button | Function | | | | | | | | | | | | | | | | |
|  | Press: switch sound output on/off. Turn: set volume. | | | | | | | | | | | | | | | | |
|  | Switches entertainment sources. | | | | | | | | | | | | | | | | |
|  | Change station/track. | | | | | | | | | | | | | | | | |
|  | Favourites buttons. | | | | | | | | | | | | | | | | |
|  | Traffic information on/off. | | | | | | | | | | | | | | | | |
|  | Change waveband. | | | | | | | | | | | | | | | | |
|  | Eject CD/DVD. | | | | | | | | | | | | | | | | |

Appendix A
Claim Chart for US Patent No. 7,489,786 Against Accused Infotainment Systems of BMW Automob

| Claim | Support | | | | | | | | | | |
|--|---|--------|---------|--|-----------------------------------|--|----------------------|--|----------------------------------|--|------------------|
| <p style="text-align: center;">Claim</p> | <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;">  <p>External devices</p> <p>Vehicle equipment</p> <p>This chapter describes all standard, national and special equipment provided in the model series. Equipment not available in the vehicle is therefore also described, for example the selected special equipment or national version. This also applies to safety-relevant functions and systems. Comply with the relevant national regulations when using the corresponding functions and systems.</p> <p>Principle</p> <p>Various external devices can be connected to the vehicle. Sound output is via the vehicle loudspeakers. Depending on how the external device is connected to the vehicle, it can be operated using iDrive.</p> <table border="1"> <thead> <tr> <th>Symbol</th> <th>Meaning</th> </tr> </thead> <tbody> <tr> <td></td> <td>AUX-IN port in the front or rear.</td> </tr> <tr> <td></td> <td>USB audio interface.</td> </tr> <tr> <td></td> <td>Music interface for smartphones.</td> </tr> <tr> <td></td> <td>Bluetooth audio.</td> </tr> </tbody> </table> <p>Overview</p> <p>The connection for external devices is in the centre armrest or in the centre console, see Vehicle Owner's Handbook.</p> <p>AUX-IN port</p> <p>Principle</p> <ul style="list-style-type: none"> Connection of audio devices, see page 52, is possible, for example MP3 players. The sound output is via the vehicle loudspeakers. <p>Connecting</p> <p>Connect the headphones or line-out connection of the equipment to the AUX-IN port. Ensure that the plug is plugged into the AUX-IN port until it clicks.</p> <p>Playback</p> <ol style="list-style-type: none"> Connect the audio device, switch it on and select a track. "Multimedia" "External devices" "AUX front" <p>Volume control</p> <p>The volume of the sound output depends on the audio device. If this volume differs significantly from other audio sources, it makes sense to balance the volumes.</p> <p>Adjusting volume</p> <ol style="list-style-type: none"> "Multimedia" "External devices" "AUX front" </div> <div style="width: 48%;">  <p>External devices</p> <p>4. "Volume"</p>  <p>Turn the Controller until the desired volume setting is reached and press the Controller.</p> <p>USB audio interface/music interface for smartphones</p> <p>Overview</p> <p>Connection options for external devices</p> <ul style="list-style-type: none"> Connection via USB audio interface, see page 52, for external devices: Apple iPod/iPhone, USB mediums, for example MP3 player, USB memory sticks or mobile telephones that are supported by the USB audio interface. Connection using snap-in adapter: Apple iPhone or suitable mobile telephones. <p>Due to the large variety of the audio devices available on the market, operation using the vehicle cannot be ensured for every device/mobile telephone.</p> <p>Depending on the format of the audio files perfect playback cannot be ensured in every case; for example bit rates higher than 256 kbit/s or the variety of different compression technologies.</p> <p>Information about suitable USB mediums is available at www.bmw.com/Bluetooth.</p> <p>Audio files</p> <p>Normal audio and video files can be reproduced.</p> <p>File systems</p> <p>Current file systems for USB are supported. Formats FAT32 are recommended.</p> <p>Connection of Apple iPod/USB audio interface</p> <p>Use a flexible adapter cable for example, the original adapter cable for iPhone.</p> <p>Connection of USB medium to USB audio interface</p> <p>Use a flexible adapter cable for example, the adapter cable supplied with the medium.</p> <p>After connecting for the first time</p> <p>Information on all titles, for example genre or title, as well as the playlist transferred to the vehicle. This takes some time, depending on the volume and the number of tracks.</p> <p>During transfer, the tracks cannot be accessed in the file directory.</p> </div> </div> | Symbol | Meaning | | AUX-IN port in the front or rear. | | USB audio interface. | | Music interface for smartphones. | | Bluetooth audio. |
| Symbol | Meaning | | | | | | | | | | |
| | AUX-IN port in the front or rear. | | | | | | | | | | |
| | USB audio interface. | | | | | | | | | | |
| | Music interface for smartphones. | | | | | | | | | | |
| | Bluetooth audio. | | | | | | | | | | |

See, e.g., Ex. B (2015 BMW Navigation, Entertainment, Communication Owner's Handbook), at p. 34, 5

² Blitzsafe has produced Ex. B, 2015 BMW Navigation, Entertainment, Communication Owner's Handbook, simultaneously with these documents as a document bearing production numbers BS-BMW-0000326. All pin-cites are to manual pages.

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.