

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

**BLITZSAFE TEXAS, LLC,**

**Plaintiff,**

**v.**

**HONDA MOTOR CO., LTD., ET AL.,**

**Defendants.**

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**Case No. 2:15-CV-1274-JRG-RSP**

**(LEAD CASE)**

**JURY TRIAL DEMANDED**

**JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT**

In accordance with Patent Rule 4-3 and the Court’s Docket Control Order of January 8, 2016 (Dkt. 56), the parties to the above-captioned case provide the following Joint Claim Construction and Prehearing Statement regarding the asserted claims of U.S. Patent Nos. 7,489,786 (the “786 patent”) and 8,155,342 (the “342 patent”) (the “Asserted Patents”). In accordance with Patent Rule 4-2(c), the parties met and conferred for the purposes of narrowing the issues and finalizing preparation of this Joint Claim Construction and Prehearing Statement.

### A. Agreed-Upon Constructions

As set forth below, the parties have been able to reach agreement regarding the construction of the following claim terms from the Asserted Patents:

Terms	Claims of the Asserted Patents	Agreed-Upon Construction
“integration” / “integrating”	’786 Patent, Claims 1, 5, 44, 57, 86, 92  ’342 Patent, Claims 49, 50, 53, 54, 56, 66, 70, 73, 74, 77, 78, 79, 80, 94, 97, 99, 102, 103, 106, 113, 120	For the ’786 patent: “Connecting one or more external devices or inputs to an existing car radio or stereo via an interface, processing and handling signals and audio channels, allowing a user to control the devices via the car stereo, and displaying data from the devices on the radio.”  For the ’342 patent: “Connecting one or more external devices or inputs to an existing car stereo or video system via an interface, processing and handling signals, audio, and/or video information, allowing a user to control the devices via the car stereo or video system, and displaying data from the devices on the car stereo or video system.”
“channeling audio signals” / “audio signals ... are selectively channeled” / “channeling audio” / “channels audio” / “channels video”	’786 Patent, Claims 1, 14, 44  ’342 Patent, Claims 97, 113, 120	“receiving and transmitting [audio or video]”
“maintain ... in an operational state”	’786 Patent, Claims 57, 86, 92	“maintain in a state responsive to processed data and audio signals from the external device”

Terms	Claims of the Asserted Patents	Agreed-Upon Construction
“first pre-programmed means for generating a device presence signal”	’786 Patent, Claim 92	<p>This is a functional claim limitation subject to § 112, ¶ 6.</p> <p><u>Function</u>: “generating a device presence signal to the car stereo”</p> <p><u>Structure</u>: “ports J2A1, X2, RCH, and LCH, connected to a power source (i.e. battery) that are provided for allowing connection between the interface system of the present invention and an after-market device, or an auxiliary input source” and “a microcontroller (U1) with hardware components such as resistors, diodes, capacitors, and oscillators”</p>
“first pre-programmed means for . . . transmitting the signal to the car stereo to maintain the car stereo in an operational state”	’786 Patent, Claim 92	<p>This is a functional claim limitation subject to § 112, ¶ 6.</p> <p><u>Function</u>: “transmitting the signal to the car stereo to maintain the car stereo in an operational state”</p> <p><u>Structure</u>: the “resistors, diodes, capacitors, transistors, transformers, amplifiers, oscillator” of FIG. 3B</p>
“means for remotely controlling the portable audio device using the car stereo by receiving a control command from the car stereo in a format incompatible with the portable audio device”	’786 Patent, Claim 92	<p>This is a functional claim limitation subject to § 112, ¶ 6.</p> <p><u>Function</u>: “remotely controlling the portable audio device by receiving a control command from the car stereo in a format incompatible with the portable audio device”</p> <p><u>Structure</u>: “a microcontroller, which is comprised of a 16F873 microcontroller manufactured by MICROCHIP, Inc.; and a plurality of resistors (R1-R7), capacitors (C1-C2), and amplifier (A1)”</p>

Terms	Claims of the Asserted Patents	Agreed-Upon Construction
<p>“means for remotely controlling the portable audio device using the car stereo by . . . processing the control command into a formatted control command compatible with the portable audio device”</p>	<p>'786 Patent, Claim 92</p>	<p>This is a functional claim limitation subject to § 112, ¶ 6.</p> <p><u>Function</u>: “remotely controlling the portable audio device by processing a control command from the car stereo in a format compatible with portable audio device”</p> <p><u>Structure</u>: “the code or algorithm illustrated in Tables 1 and 2 of '786 Patent”</p>
<p>“means for remotely controlling the portable audio device using the car stereo by . . . transmitting the formatted control command to the portable audio device for execution thereby”</p>	<p>'786 Patent, Claim 92</p>	<p>This is a functional claim limitation subject to § 112, ¶ 6.</p> <p><u>Function</u>: “transmitting the formatted control command to the portable audio device for execution thereby”</p> <p><u>Structure</u>: “circuit in Figure 3B . . . having a plurality of resistors, diodes, capacitors, transistors, transformers, amplifiers, oscillator, among other structural components that provide the hardware framework, for the microcontroller to act as an interface in integrating an after-market device with a car stereo”</p>

Terms	Claims of the Asserted Patents	Agreed-Upon Construction
“means for transmitting audio from the portable audio device to the car stereo”	’786 Patent, Claim 92	<p>This is a functional claim limitation subject to § 112, ¶ 6.</p> <p><u>Function</u>: “transmitting audio from the portable audio device to the car radio”</p> <p><u>Structure</u>: “circuit in Figure 3B ... having a plurality of resistors, diodes, capacitors, transistors, transformers, amplifiers, oscillator, among other structural components that provide the hardware framework, for the microcontroller to act as an interface in integrating an after-market device with a car stereo”</p>

### B. Disputed Constructions

Exhibits A and B, attached hereto, identify the disputed claim terms.

Exhibit A provides Blitzsafe’s identification of intrinsic and extrinsic evidence supporting its proposed constructions, as required by Patent Rule 4-3(b).

Exhibit B provides Defendants’ identification of intrinsic and extrinsic evidence supporting its proposed constructions, as required by Patent Rule 4-3(b).

### C. Anticipated Length of Time for the Claim Construction Hearing

The parties agree that the Claim Construction Hearing will take no longer than three (3) hours.

### D. Identification of Witnesses

Blitzsafe may rely upon testimony (by declaration) from Mr. Joseph McAlexander. Mr. McAlexander may testify about his background, the background of the subject matter discussed

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