

Appendix A

**Plaintiff Blitzsafe Texas, LLC's Proposed Constructions and Extrinsic Evidence
Pursuant to Patent Rule 4-2**

No.	Claim Term/Phrase	Patent/Claims	Blitzsafe's Preliminary Construction	Extrinsic Evidence
AGREED CONSTRUCTIONS				
1	"integration" / "integrating"	'786 Patent, claims 1, 5, 57, 86, 92	"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."	
2	"integration" / "integrating"	'342 Patent, claims 49, 50, 53, 54, 56, 66, 70, 73, 74, 77, 78, 79, 80, 94, 97, 99, 102, 103, 106, 113, 120	"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"	
3	"auxiliary input source"	'786 Patent, claims 1, 14	"a device that outputs audio by headphone jack or other connector"	

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4	"channeling audio signals" / "audio signals . . . are selectively channeled"	'786 Patent, claims 1, 14 '342 Patent, claims 97, 113, 120	"receiving and transmitting audio"	
5	"device presence signal"	'786 Patent, claims 6, 57, 86, 92 '342 Patent, claims 56, 106	"a continuously transmitted signal indicating an audio device is present"	
6	"portable"	'786 Patent, claims 57, 92, 94, 97 '342 Patent, claims 49, 52, 53, 54, 56, 57, 62, 63, 64, 66, 70, 71, 73, 76, 77, 78, 80, 94, 95, 97, 100, 101, 103, 106, 109, 110, 111, 113, 115, 120	"capable of being moved about"	
7	"pre-programmed"	'786 Patent, claims 1, 7, 8, 57, 60, 86, 90, 91, 92	Plain and ordinary meaning	

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8	“connector electrically connectable to” / “electrical connector” / “connectable”	’786 Patent, claims 1, 2, 4, 5, 57, 86, 97	Plain and ordinary meaning	
PRESENTLY DISPUTED CONSTRUCTIONS				
1	"channeling audio" / "channels audio" / "channels video"	’786 Patent, claims 1 ’342 Patent, claims 97, 99, 113	"receiving and transmitting audio” or “receives and transmits [audio/video]”	Judge Payne’s Memorandum Dkt. 146, in <i>B Honda Motor</i> No. 2:15-cv-1 well as all briefs referred to the Blitzsafe may testimony of McAlexander this claim term

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2	"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"	Judge Payne's Memorandum Dkt. 146, in <i>B Honda Motor</i> No. 2:15-cv-1 well as all briefs referred to the Blitzsafe may testimony of M McAlexander this claim term
3	"maintaining . . . in a state responsive" / "maintain . . . in a state responsive"	'786 Patent, claim 6 '342 Patent, claims 56, 106	"preventing the car stereo from shutting off, entering a sleep mode, or otherwise being unresponsive to signals and/or data from an external source"	Judge Payne's Memorandum Dkt. 146, in <i>B Honda Motor</i> No. 2:15-cv-1 well as all briefs referred to the Blitzsafe may testimony of M McAlexander this claim term

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4	"interface"	'786 Patent, claims 1, 5, 6, 10, 14, 23, 57, 64, 86, 88, 92, 97	"a device that includes a microcontroller and that is a functionally and structurally separate component from the car stereo, which integrates an external aftermarket device with a car stereo"	Judge Payne's Memorandum Dkt. 146, in <i>B Honda Motor</i> No. 2:15-cv-1 well as all briefs referred to the Blitzsafe may testimony of M McAlexander this claim term
5	"integration subsystem"	'342 Patent, claims 49, 50, 53, 54, 55, 56, 57, 66, 70, 73, 77, 78, 79, 80, 97, 99, 102, 103, 106, 113, 120	Not subject to 35 U.S.C. § 112 p.6 "a subsystem that includes a microcontroller configured to integrate an external device with a car audio/video system"	Judge Payne's Memorandum Dkt. 146, in <i>B Honda Motor</i> No. 2:15-cv-1 well as all briefs referred to the Blitzsafe may testimony of M McAlexander this claim term

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