

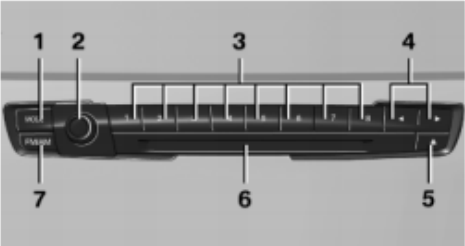
Appendix A
Claim Chart for US Patent No. 7,489,786 Against Accused Infotainment Systems of BMW Automobiles

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 intended to preclude 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, and are intended to accurately describe the infringing features of its accused products. Accordingly, Blitzsafe reserves the right to supplement 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										
<div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center; background-color: #f0f0f0; margin: 0;">Entertainment CD/multimedia</p> <p>Deleting the music collection</p> <ol style="list-style-type: none"> 1. "CD/Multimedia" 2. "Music collection" 3. Open "Options". 4. "Delete music collection" <p>External devices</p> <p>At a glance</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th style="width: 15%;">Symbol</th> <th>Meaning</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">🔗</td> <td>AUX-IN port</td> </tr> <tr> <td style="text-align: center;">📶</td> <td>USB audio interface</td> </tr> <tr> <td style="text-align: center;">📱</td> <td>Mobile phone audio interface</td> </tr> <tr> <td style="text-align: center;">📶</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="font-size: small; margin-top: 10px;">210 Online Edition for Part no. 01 40 2 608 633 - 11 09 490</p> </div>	Symbol	Meaning	🔗	AUX-IN port	📶	USB audio interface	📱	Mobile phone audio interface	📶	Bluetooth audio	<div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center; background-color: #f0f0f0; margin: 0;">CD/multimedia</p> <p>Connectors for external devices</p> <ul style="list-style-type: none"> ▶ Connection via USB audio interface: Apple iPod/iPhone, USB devices, e.g., MP3 players, USB flash drives, or mobile phones that are supported by the USB audio interface. ▶ Connection via snap-in adapter when equipped with extended connectivity of the music player in the mobile phone: Apple iPhone or mobile phones. <p>Playback is only possible when there is no audio device attached to the AUX-IN port.</p> <p>Due to the large number of different audio devices available on the market, it cannot be ensured that every audio device/mobile phone is operable on the vehicle.</p> <p>Ask your service center about suitable audio devices/mobile phones.</p> <p>Audio files</p> <p>Standard audio files can be played back:</p> <ul style="list-style-type: none"> ▶ MP3. ▶ WMA. ▶ WAV (PCM). ▶ AAC, M4A. ▶ Playback lists: M3U, WPL, PLS. <p>File systems</p> <p>Popular file systems for USB devices are supported. FAT 32 is the recommended format.</p> <p>Connection of Apple iPod/iPhone via USB audio interface</p>  <p>USB audio interface is located in the center armrest. To connect the device, use the adapter for the Apple iPod/iPhone from your service center.</p> <p>Connect the device with the AUX interface using the adapter or using the interface.</p> <p>The Apple iPod/iPhone is supported by the USB audio interface.</p> <p>Connection of a USB audio interface</p>  <p>USB audio interface is located in the center armrest. Connect using a flexible USB audio interface against physical damage.</p> <p>Connect the USB interface.</p> <p>After connecting for the</p> <p>Information on all music tracks of music, as well as played into the vehicle. This depends on the USB device of tracks.</p> <p style="font-size: small; margin-top: 10px;">Online Edition for Part no. 01 40 2 608 633 - 11 09 490</p> </div>
Symbol	Meaning										
🔗	AUX-IN port										
📶	USB audio interface										
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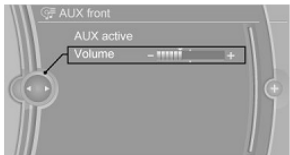
See, e.g., Ex. A (2011 BMW 3-series Owner's Manual), at p. 190, 210-211.¹

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

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

Claim	Support																
	<div style="border: 1px solid gray; padding: 10px;"> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid gray; margin-bottom: 10px;"> Entertainment General </div> <h2 style="margin: 0;">General</h2> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <h3 style="margin: 0;">Vehicle equipment</h3> <p style="font-size: small; margin: 0;">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="width: 45%;"> <h3 style="margin: 0;">Sound output</h3> <div style="margin-bottom: 10px;"> <h4 style="margin: 0;">Switching on</h4>  <p style="font-size: x-small; margin: 0;">With the ignition switched off: press button.</p> </div> <div> <h4 style="margin: 0;">Muting</h4>  <p style="font-size: x-small; margin: 0;">With the ignition switched on, or engine running: press button.</p> </div> </div> </div> <div style="margin-top: 10px;"> <h3 style="margin: 0;">Control functions</h3> <table style="width: 100%; border-collapse: collapse; font-size: x-small;"> <thead> <tr style="background-color: #e6f2ff;"> <th style="width: 20%;">Press the button</th> <th>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> <div style="margin-top: 10px;"> <h3 style="margin: 0;">Changing entertainment source</h3> <p style="font-size: x-small; margin: 0;">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> <div style="display: flex; justify-content: space-between; margin-top: 10px; font-size: x-small;"> 34 Online Edition for Part no. 01 40 2 960 980 - II/15 </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.
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<p style="text-align: center;">Entertainment External devices</p> <h2 style="text-align: center;">External devices</h2> <h3 style="text-align: center;">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> <h3 style="text-align: center;">Principle</h3> <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> <h3 style="text-align: center;">Overview</h3> <p>The connection for external devices is in the centre armrest or in the centre console, see Vehicle Owner's Handbook.</p> <h3 style="text-align: center;">AUX-IN port</h3> <h4 style="text-align: center;">Principle</h4> <ul style="list-style-type: none"> Connection of audio devices, see page 52, is possible, for example MP3 players. The <p style="text-align: center;">52 Online Edition for Part no. 01 40 2 960 980 - II/15</p>	Symbol	Meaning		AUX-IN port in the front or rear.		USB audio interface.		Music interface for smartphones.		Bluetooth audio.	<p style="text-align: right;">External devices Ent</p> <h3 style="text-align: center;">External devices</h3> <h4 style="text-align: center;">"Volume"</h4>  <ol style="list-style-type: none"> Turn the Controller until the desired volume setting is reached and press the Controller. <h3 style="text-align: center;">USB audio interface/music interface for smartphones</h3> <h4 style="text-align: center;">Overview</h4> <h5 style="text-align: center;">Connection options for external devices</h5> <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> <h4 style="text-align: center;">Audio files</h4> <p>Normal audio and video files can be reproduced.</p> <h4 style="text-align: center;">File systems</h4> <p>Current file systems for USB are supported. Formats FAT32 are recommended.</p> <h4 style="text-align: center;">Connection of Apple iPod USB audio interface</h4> <p>Use a flexible adapter cable for example, the original adapter cable for iPhone.</p> <p>Connect Apple iPod USB audio interface, see page 52, for external devices. The menu structure of the iPod/iPhone is supported.</p> <h4 style="text-align: center;">Connection of USB medium audio interface</h4> <p>Use a flexible adapter cable for example, the adapter cable supplied with the medium.</p> <p>Connect the USB audio interface, see page 52, for external devices.</p> <h4 style="text-align: center;">After connecting for the first time</h4> <p>Information on all titles, for example genre or title, as well as the playback time transferred to the vehicle. This is done, depending on the title and the number of tracks.</p> <p>During transfer, the tracks can be found in the file directory.</p> <p style="text-align: center;">Online Edition for Part no. 01 40 2 960 980 - II/15</p>
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, 52

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.

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