

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

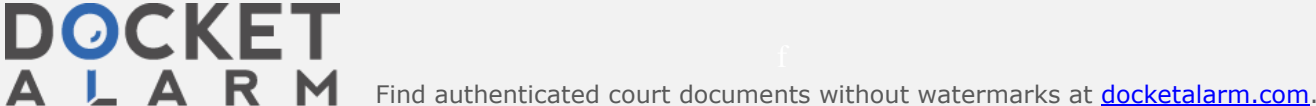
BLITZSAFE TEXAS, LLC,	}	
	}	
Plaintiff,	}	Case No. 2:17-cv-00430-JRG
	}	
vs.	}	(Lead Case)
	}	
MITSUBISHI ELECTRIC CORPORATION,	}	JURY TRIAL DEMANDED
et al.,	}	
	}	
Defendants.	}	

DEFENDANTS’ JOINT DISCLOSURES PURSUANT TO P.R. 4-2

Pursuant to P. R. 4-2 and the Court’s Docket Control Order (Dkt. 88), Defendants Mitsubishi Electric Corporation, MITSUBISHI MOTORS CORPORATION; Mitsubishi Motors North America, BMW of North America, LLC, Bayerische Motoren Werke AG, Daimler AG, Mercedes-Benz USA, LLC, and Mazda Motor of North America, Inc. d/b/a Mazda North American Operations (collectively, “Defendants”)¹, hereby attach at Exhibit A their Preliminary Claim Constructions and Extrinsic Evidence. In order to reduce the burden on the Court, Defendants have identified certain terms from their P.R. 4-1 identification of terms for which we do not presently seek a construction. Exhibit A is based on information currently available to Defendants. Defendants have not completed discovery and have not received Plaintiff’s P.R. 4-2 Disclosures. Defendants therefore reserve the right to revise, amend, or subtract from this list of terms to be construed, proposed constructions, and identification of extrinsic evidence based on further discovery

¹ Nothing herein shall be construed as a waiver by any Defendant(s) of any defenses or affirmative defenses, including any and all venue, jurisdiction, and other challenges to this litigation in this forum.

Patent Owner Blitzsafe Texas, LLC – Exhibit 2001



and Plaintiff's proposed terms and constructions. Nothing in this submission shall be construed to be an admission by Defendants.

Respectfully submitted,

Dated: March 14, 2018

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