

Appendix C - Claim Chart for US Patent No. 7,489,786 Against Accused Infotainment Systems of SMART AU

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 Smart automobiles identified in Blitzsafe's Disclosure. These Infringement Contentions served herewith. Blitzsafe does not concede that any claims of the '786 patent that are not identified below are infringed by the identified products. Moreover, the citations to certain documents and other information below are intended to support only and in no way foreclose Blitzsafe from citing or relying on additional documents, information, source code, and/or testimony. These contentions are preliminary in nature, and an analysis of Smart's products, internal documentation, source code, and other relevant witnesses may more fully and accurately describe the infringing features of its accused products. Accordingly, Blitzsafe reserves the right to supplement, correct, modify, and/or amend these contentions once such additional information is made available. Furthermore, Blitzsafe reserves the right to supplement, correct, modify, and/or amend these contentions as discovery progresses, in view of the Court's claim construction order(s); in view of any positions taken by Smart, including but not limited to its claim construction, invalidity, and/or non-infringement; and in connection with the preparation and exchange of expert reports.

Claim	Support
1[P]. An audio device integration system comprising:	Each accused Smart infotainment system includes a device integration system that supports integration of smart devices as smartphones and other smart devices as well as MP3 players (e.g., iPods and iPhones playing MP3 files). The accused infotainment systems also support device integration of smartphones and other smart devices (e.g., iPhones) playing audio streamed over the Internet, such as via the Aha and iHeartRadio applications and via other applications such as Pandora.

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	<p>MMC memory card is divided into several partitions, only the first partition found is played. A partition must not be larger than 32 GB.</p> <p>Inserting an SD/MMC memory card</p> <ul style="list-style-type: none"> ▶ Press the [▲] button on the front panel. The front panel is folded down and uncovers the slot for the SD/MMC memory card (on the right beside the SD logo). ▶ Insert an SD/MMC memory card into the slot. The side with the contacts must face downwards and point towards the slot. ▶ Press the [▲] button on the front panel. The front panel moves up and closes the SD/MMC memory card slot. <p>Removing the SD/MMC memory card</p> <ul style="list-style-type: none"> ▶ Press the [▲] button on the front panel. The front panel is folded down and uncovers the slot for the SD/MMC memory card (on the right beside the SD logo). ▶ Press the SD/MMC memory card. The SD/MMC memory card is ejected. ▶ Remove the SD/MMC memory card. ▶ Press the [▲] button on the front panel again. The front panel moves up and closes the SD/MMC memory card slot. <p>iPod®/iPhone® mode</p> <p>Supported variants</p> <ul style="list-style-type: none"> ⓘ iPod® and iPhone® are registered trademarks of Apple Inc., Cupertino, California, USA. <p>The following iPod® variants are supported:</p> <ul style="list-style-type: none"> • iPod® classic 120 GB • iPod® classic • iPod® nano 5G • iPod® nano 4G <p>• iPod® nano 3G • iPod® nano 2G • iPod® touch 3G • iPod® touch 2G • iPod® touch • iPod® 5G</p> <p>The following iPhone® variants are supported:</p> <ul style="list-style-type: none"> • iPhone® 3G • iPhone® 3GS <p>Connecting an iPod®/iPhone®</p> <ul style="list-style-type: none"> ▶ Connect the device to the USB port. <ul style="list-style-type: none"> ⓘ Connecting an iPod which has been excessively discharged can result in an extended initialisation period. ⓘ Never leave an iPod®/iPhone® in the vehicle, as extreme temperatures (e.g. if subjected to direct sunlight or to extremely low outside temperatures) may prevent it from functioning correctly (see the separate operating instructions of the respective device). smart does not take responsibility for any damage to external devices. <p>Operation via a USB/AUX port</p> <p>USB/AUX port</p> <p>The ports are in the glove compartment on the left-hand side.</p>

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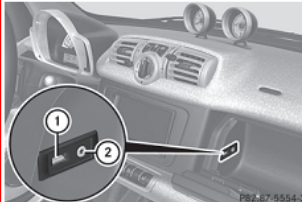
Claim	Support
	<div data-bbox="443 726 802 966" data-label="Image"> </div> <div data-bbox="443 974 548 1024" data-label="List-Group"> <ul style="list-style-type: none"> ① USB port ② AUX port </div> <div data-bbox="443 1031 792 1098" data-label="Text"> <p>You can connect an external audio source (AUX) to audio system navigation/multimedia.</p> </div> <div data-bbox="443 1104 786 1150" data-label="Text"> <p>The USB port supports the following USB devices:</p> </div> <div data-bbox="443 1159 805 1255" data-label="List-Group"> <ul style="list-style-type: none"> • USB sticks (flash memory) • USB hard discs requiring a permanent current of up to 500 mA (it may be necessary to connect a separate power supply) </div> <div data-bbox="443 1262 802 1379" data-label="Text"> <p>i Audio system navigation/multimedia supports USB storage medium of "USB Device Subclass 6". Information concerning USB Device Subclass 6 is available from the equipment manufacturer.</p> </div> <div data-bbox="443 1383 802 1501" data-label="Text"> <p>A maximum of 20,000 media files (audio, video, pictures) are played. If the USB storage medium is divided into several partitions, only the first partition found is played.</p> </div> <div data-bbox="443 1505 769 1528" data-label="Text"> <p>Size specifications for a partition:</p> </div> <div data-bbox="443 1535 693 1585" data-label="List-Group"> <ul style="list-style-type: none"> • USB sticks < 64 GB • USB hard discs < 1,000 GB </div> <div data-bbox="443 1589 805 1684" data-label="Text"> <p>Partitions of over 256 GB result in an extended initialisation period. It could therefore take a long time before playback starts.</p> </div> <div data-bbox="443 1686 760 1732" data-label="Text"> <p>Media files must be smaller than 256 GB.</p> </div> <div data-bbox="443 1738 802 1808" data-label="Text"> <p>For more details and a comprehensive list of supported devices, please contact a smart Centre.</p> </div> <div data-bbox="824 726 1136 749" data-label="Section-Header"> <p>Connecting an audio device to AUX</p> </div> <div data-bbox="824 760 1182 884" data-label="List-Group"> <ul style="list-style-type: none"> ▶ Connect the audio device using a 3.5 mm stereo jack plug with AUX port ②. ▶ Please see the respective operating instructions for how to operate the external audio source. </div> <div data-bbox="824 911 1044 934" data-label="Section-Header"> <p>Connecting a USB device</p> </div> <div data-bbox="824 945 1182 1188" data-label="List-Group"> <ul style="list-style-type: none"> i Do not leave external devices in the vehicle as their correct function cannot be guaranteed if they are subjected to extreme temperatures, e.g. if subjected to direct sunlight or very low outside temperatures (see the operating instructions of the respective device). smart does not take responsibility for any damage to external devices. ▶ Connect the USB device to USB port ①. </div> <div data-bbox="824 1239 1034 1262" data-label="Section-Header"> <p>Bluetooth® audio mode</p> </div> <div data-bbox="824 1276 925 1299" data-label="Section-Header"> <p>Conditions</p> </div> <div data-bbox="824 1320 1029 1344" data-label="Section-Header"> <p>Bluetooth® audio device</p> </div> <div data-bbox="824 1350 1159 1398" data-label="Text"> <p>Bluetooth® audio mode requires a Bluetooth®-capable audio device.</p> </div> <div data-bbox="824 1404 1185 1568" data-label="Text"> <p>Not all Bluetooth® audio devices available on the market are equally suitable. You can obtain more detailed information about suitable Bluetooth® audio devices and about connecting Bluetooth® audio devices to audio system navigation/multimedia from your smart Centre.</p> </div>

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	<i>See, e.g.,</i> Ex. A (2011 Smart Audio system navigation/multimedia supplement), at p. 88-89. ¹

¹ Blitzsafe has produced Ex. A, 2011 Smart Audio system navigation/multimedia supplement, simultaneously with these Infringement document bearing production numbers BS-MB-00000271-BS-MB-00000386. All pin-cites are to manual pages.

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	<div data-bbox="423 709 787 1333" style="border: 1px solid red; padding: 5px;"> <p>iPod®/iPhone® mode</p> <p>Supported devices</p> <p>1 iPod® and iPhone® are registered trademarks of Apple Inc., Cupertino, California, USA.</p> <p>The following iPod® variants are supported:</p> <ul style="list-style-type: none"> • iPod® classic 120 GB • iPod® classic • iPod® nano 5G • iPod® nano 4G • iPod® nano 3G • iPod® nano 2G • iPod® touch 3G • iPod® touch 2G • iPod® touch • iPod® 5G <p>The following iPhone® variants are supported:</p> <ul style="list-style-type: none"> • iPhone® 3G • iPhone® 3GS </div> <div data-bbox="423 1346 787 1711" style="border: 1px solid gray; padding: 5px;"> <p>Connecting an iPod®/iPhone®</p> <p>► Connect the device to the USB port.</p> <p>1 Connecting an iPod which has been fully discharged can result in an extended initialization period.</p> <p>1 Do not leave the iPod®/iPhone® in your vehicle. Extreme temperatures can effect functionality (e.g. direct sunlight or extremely low external temperatures; see the operating instructions of the respective device). smart does not take responsibility for any damage to external devices.</p> </div> <div data-bbox="829 745 1144 1081" style="border: 1px solid red; padding: 5px;"> <p>Operation via a USB/AUX port</p> <p>USB/AUX port</p> <p>The ports are in the glove box on the left-hand side.</p>  </div> <div data-bbox="829 1081 1144 1711" style="border: 1px solid gray; padding: 5px;"> <p>1 USB port 2 AUX port</p> <p>You can connect an external audio source (AUX) to audio system navigation/multimedia.</p> <p>The USB port supports the following USB devices:</p> <ul style="list-style-type: none"> • USB sticks (flash memory) • USB hard discs requiring a permanent current of up to 500 mA (it may be necessary to connect a separate power supply) <p>1 Audio system navigation/multimedia supports USB storage devices in the "USB Device Subclass 6". Information concerning USB Device Subclass 6 is available from the equipment manufacturer.</p> <p>A maximum of 20,000 media files (audio, video, images) can be played. If the USB storage medium is divided into several partitions, only the first partition found is played.</p> <p>Size specifications for a partition:</p> <ul style="list-style-type: none"> • USB sticks < 64 GB • USB hard discs < 1000 GB <p>Partitions of over 256 GB result in an extended initialization period. It</p> </div> <div data-bbox="1161 745 1485 1333" style="border: 1px solid gray; padding: 5px;"> <p>could therefore take a long time before playback starts.</p> <p>Media files must be smaller than 256 GB.</p> <p>For more details and a comprehensive list of supported devices, please contact a smart center.</p> <p>Connecting an audio device to AUX</p> <p>► Connect the audio device to AUX port 2 using a 3.5 mm stereo jack plug.</p> <p>► Please see the respective operating instructions for how to operate the external audio source.</p> <p>Connecting a USB device</p> <p>1 Do not leave external devices in the vehicle, as their correct function cannot be guaranteed if they are subjected to extreme temperatures, e.g. from exposure to direct sunlight or very low outside temperatures (see the operating instructions of the respective device). smart does not take responsibility for any damage to external devices.</p> <p>► Connect the USB device to USB port 1.</p> </div> <div data-bbox="1161 1354 1485 1711" style="border: 1px solid gray; padding: 5px;"> <p>Bluetooth® audio mode</p> <p>Conditions</p> <p>Bluetooth® audio device</p> <p>Bluetooth® audio mode requires a Bluetooth®-capable audio device. Not all Bluetooth® audio devices available on the market are equally suitable. You can obtain more detailed information about suitable Bluetooth® audio devices and about connecting Bluetooth® audio devices to audio system navigation/multimedia from your smart Center.</p> </div>

See, e.g., Ex. B (2012 Smart Audio system navigation/multimedia supplement), at p. 83-84.²

² Blitzsafe has produced Ex. B, 2012 Smart Audio system navigation/multimedia supplement, simultaneously with these Infringement document bearing production numbers BS-MB-00000387-BS-MB-00000496. All pin-cites are to manual pages.

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