

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

BLITZSAFE TEXAS, LLC,	)	
	)	
Plaintiff,	)	<b>Case No. 2:17-cv-00430-JRG</b>
vs.	)	<b>(Lead Case)</b>
MITSUBISHI ELECTRIC CORPORATION,	)	<b>JURY TRIAL DEMANDED</b>
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")<sup>1</sup>, 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

<sup>1</sup> 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.

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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