

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

STRATOSAUDIO INC.,

Plaintiff,

v.

HYUNDAI MOTOR AMERICA.,

Defendant.

Case No. 6:20-cv-01125-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

MAZDA MOTORS OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-01126-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

SUBARU OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-01128-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

VOLVO CARS USA, LLC,

Defendant.

Case No. 6:20-cv-01129-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

VOLKSWAGEN GROUP OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-01131-ADA

DEFENDANTS' DISCLOSURE OF INVALIDITY CONTENTIONS

StratosAudio Exhibit 2001

Hyundai v. StratosAudio

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I. INTRODUCTION

Pursuant to the Proposed Joint Scheduling Order (Case No. 6:20-cv-01125-ADA, D.I. 39), Defendants Hyundai Motor America (“Hyundai”), Mazda Motors of America, Inc. (“Mazda”), Subaru of America, Inc. (“Subaru”), Volvo Cars USA, LLC, (“VCUSA”), and Volkswagen Group of America, Inc., (“Volkswagen”) (collectively “Defendants”) hereby serve their initial disclosure of invalidity contentions. Plaintiff StratosAudio Inc. (“StratosAudio”) has asserted the following patents and claims: (1) U.S. Patent No. 8,166,081 (“the ’081 patent”), claims 9-11 and 23; (2) U.S. Patent No. 8,688,028 (“the ’028 patent”), claims 11, 14-16, and 18; (3) U.S. Patent No. 8,903,307 (“the ’307 patent”), claims 11, 15, 16, and 18; (4) U.S. Patent No. 9,584,843 (“the ’843 patent”), claims 10, 11, and 13; (5) U.S. Patent No. 8,200,203 (“the ’203 patent”), claims 43, 47, 48, 51, and 52; (6) U.S. Patent No. 9,294,806 (“the ’806 patent”), claims 5-8 and 10; (7) U.S. Patent No. 9,366,405 (“the ’405 patent), claims 12-16; and (8) U.S. Patent No. 9,143,833 (“the ’833 patent”), claims 1, 3-5-7, and 9 (collectively the “Asserted Claims” of the “Asserted Patents”).¹

II. GENERAL RESERVATIONS

These invalidity contentions are provisional. Defendants reserve the right to revise or supplement these contentions in light of newly-discovered prior art; discovery produced in this case, such as party and third-party discovery (such as device art expected from third parties); StratosAudio’s infringement contentions; any claim construction order issued by the Court; review and analysis by expert witnesses; and further investigation and discovery regarding the defenses asserted by Defendants. Without limiting the foregoing, Defendants expressly reserve the right to amend these contentions after issuance of the claim construction order; should

¹ The ’833 Patent is asserted only against VCUSA and no other defendants, join that section.

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