EXHIBIT C

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

BLITZSAFE TEXAS, LLC, Plaintiff, v. HONDA MOTOR CO., LTD.; AMERICAN HONDA MOTOR CO., INC.; HONDA OF AMERICA MFG., INC.; HONDA MANUFACTURING OF ALABAMA, LLC; AND HONDA MANUFACTURING OF INDIANA, LLC, Defendants.	§ § § § § § § § § § § § § § §	NO. 2:15-CV-01274 (LEAD CASE)

DEFENDANTS' P.R. 4-2 DISCLOSURES

Defendants American Honda Motor Co., Inc., Honda of America Mfg., Inc., Honda Manufacturing of Alabama, LLC, and Honda Manufacturing of Indiana, LLC (collectively, "Honda"), Hyundai Motor America and Hyundai Motor Manufacturing Alabama, LLC (collectively, "Hyundai"), Kia Motor America, Inc. and Kia Motors Manufacturing Georgia, Inc. (collectively, "Kia"), Nissan North America, Inc. and Nissan Motor Co., Ltd. (collectively, "Nissan"), Toyota Motor Corporation, Toyota Motor Sales U.S.A., Inc., Toyota Motor Manufacturing, Texas, Inc., Toyota Motor Manufacturing Kentucky, Inc., and Toyota Motor Manufacturing Mississippi, Inc. (collectively, "Toyota"), and Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC (collectively, "Volkswagen") (all of the foregoing are collectively referred to herein as "Defendants") hereby submit their preliminary claim constructions and extrinsic evidence for the claims Defendants

propose to be construed in U.S. Patent No. 7,489,786 ("the '786 patent") and U.S. Patent No. 8,155,342 ("the '342 patent").

These preliminary claim constructions are based on the asserted claims identified in Plaintiff's Disclosure of Asserted Claims and Infringement Contentions, served separately on each of the respective Defendants on November 24, 2015 ("Infringement Contentions"). Plaintiff has asserted one or more claims of the '786 patent and the '342 patent.

If Plaintiff asserts that other claims are infringed, modifies its Local Patent Rule disclosures, or if other claims otherwise become relevant, Defendants reserve the right to modify, supplement, or amend their list of terms and/or revise their constructions set forth below in light of such information. Defendants submit their disclosure of preliminary claim constructions without the benefit of complete discovery, and reserve the right to supplement or amend their proposed claim constructions after reviewing Plaintiff's proposed constructions, further analyzing the intrinsic and extrinsic evidence, and meeting and conferring with Plaintiff regarding the parties' proposed constructions or as further evidence is discovered.

Pursuant to P.R. 4-2(a), Defendants propose in Exhibit A constructions for each claim term, phrase, or clause ("claim term") collectively identified for claim construction purposes. For some claim terms, Defendants propose alternative constructions, or propose that the claim terms are indefinite and provide an alternative construction if the claim terms are found not to be indefinite. As with the other proposed claim constructions, Defendants will work cooperatively together and with Plaintiff in an effort to reach agreement on the claim construction issues to be presented to the Court.

Pursuant to P.R. 4-2(b), Defendants identify in Exhibit A their preliminary identification of extrinsic evidence. In addition to the extrinsic evidence identified herein, Defendants reserve

the right to rely on any extrinsic evidence identified by Plaintiff in this matter or by any party in any related litigation. Defendants reserve their right to call on experts or other witnesses for the purposes of rebutting the constructions proffered by Plaintiffs, or to rebut any extrinsic evidence offered by Plaintiffs, including any expert opinions.

Pursuant to P.R. 4-2(c), Defendants are prepared to meet and confer with Plaintiff at a mutually agreeable time to finalize preparation of a Joint Claim Construction and Prehearing Statement.

Defendants also plan to argue in their claim construction briefing that claims 13 and 63 of the '786 patent and all asserted claims of the '342 patent are indefinite for impermissibly mixing both an apparatus and a method in a single claim, under *IPXL Holdings, LLC, v. Amazon.com, Inc.*, 430 F.3d 1377 (Fed. Cir. 2005). Each of claims 13 and 63 of the '786 patent impermissibly recites an apparatus (i.e., "the apparatus of [claim 1/claim 60]") and a use of the apparatus (i.e., "wherein commands are input by a user using one or more control buttons or presets on the car stereo."). Each of claims 49, 73, 97, and 120 of the '342 patent recites an apparatus (i.e., "a multimedia device integration system") and a use of the apparatus (e.g., in claim 49, "wherein said integration subsystem *obtains*, using said wireless communication link, information about an audio file . . . , *transmits* the information . . . , *instructs* the portable device . . . , and *receives* audio generated by the portable device . . . .").

Dated: March 11, 2016

Respectfully submitted,

/s/ Joseph M. Beauchamp

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