

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, et al.,

Defendants.

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No. 2:15-CV-01274 (Lead Case)

DECLARATION OF IRA MARLOWE

I, Ira Marlowe, hereby declare as follows:

1. I am the President of Blitzsafe Texas, LLC and the inventor of U.S. Patents 7,489,786 and 8,155,342. Also, I was a member of Blitzsafe’s predecessor, Marlowe Patent Holdings LLC.

2. Neither I nor Blitzsafe Texas, LLC has ever received a copy of the TOY/PAN source code from Mr. Kun Cho. I have been made aware that Mr. Cho viewed the source code during his time representing Marlowe Patent Holdings LLC, but he never sent me this source code.

3. Blitzsafe has a copy of the TOY/PAN source code in its possession that was first sent to me by my attorneys on July 18, 2016. My understanding is that this code was produced to my attorneys as the result of Defendants’ subpoena to Ford Motor Company in this litigation. Blitzsafe did not have possession of this code prior to receiving it from my attorneys in this litigation on July 18, 2016.

I declare under the penalty of perjury that the foregoing to be true and correct. Executed
on August 8, 2016 in Englewood, New Jersey.



Ira Marlowe