

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

BLITZSAFE TEXAS, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	No. 2:15-CV-01274 (Lead Case)
	§	
HONDA MOTOR CO., LTD, et al.,	§	
	§	
Defendants.	§	
	§	

**DECLARATION OF ALESSANDRA CARCATERRA MESSING IN SUPPORT OF
PLAINTIFF BLITZSAFE TEXAS LLC’S RESPONSE TO DEFENDANTS’ OPPOSED
MOTION FOR LEAVE TO SUPPLEMENT INVALIDITY CONTENTIONS**

I, Alessandra Carcaterra Messing, hereby declare as follows:

1. I am an associate at the law firm of Brown Rudnick LLP, counsel for Plaintiff Blitzsafe Texas, LLC (“Plaintiff”). I am admitted to practice before this Court. I submit this declaration in support of Blitzsafe’s Opposition to Defendants’ Motion for Leave to Supplement Invalidity Contentions. I am familiar with the facts set forth herein.

2. Attached as Exhibit A is a true and correct copy of Toyota Motor Corporation's Petition for *Inter Partes* Review of Patent No. 8,155,342 dated December 30, 2015, Case IPR2016-00418 (exemplary of cases IPR2016-00419, IPR2016-00421, and IPR2016-00422).

3. Attached as Exhibit B is a true and correct copy of the Declaration of Thomas Matheson, Ph.D. in Support of Petitioner’s Request for *Inter Partes* Review of Patent No. 8,155,342 dated December 30, 2015, Case IPR2016-00418.

4. Attached as Exhibit C is a true and correct copy of a Declaration of Ira Marlowe dated August 8, 2016.

5. Attached as Exhibit D is a true and correct copy of Honda, Hyundai, Kia, Nissan, and Toyota Defendants' P.R. 3-3 & 3-4 Invalidity Contentions and Disclosures dated January 19, 2016.

I declare the foregoing to be true under the penalty of perjury on August 8, 2016.

/s/ Alessandra Carcaterra Messing
Alessandra Carcaterra Messing