

Exhibit 1

I. DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS PURSUANT TO PATENT LOCAL RULE 3-1

A. ASSERTED CLAIMS

1. Volkswagen Accused Products

Defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, Inc. (collectively, "Volkswagen") have infringed and continue to infringe at least the following claims of the Blitzsafe patents in connection with the Volkswagen Accused Products set forth below:

- Claim 1, 2, 4-8, 13, 14, 23, 24, 44, 47, 57, 58, 60-65, 86, 88-92, 94, 97, and 98 of the '786 patent; and
- Claims 49-54, 56, 62-64, 71, 73-78, 95, 97, 99-101, 106, 109-111, and 120 of the '342 patent.

2. Audi Accused Products

Volkswagen has infringed and continues to infringe at least the following claims of the Blitzsafe patents in connection with the Audi Accused Products set forth below:

- Claim 1, 2, 4-8, 13, 14, 23, 24, 44, 47, 57, 58, 60-65, 86, 88-92, 94, 97, and 98 of the '786 patent; and
- Claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, and 120 of the '342 patent.

Blitzsafe reserves the right to seek leave of court to add, delete, substitute, or otherwise amend this list of asserted claims should further discovery, the Court's claim construction, or other circumstances so merit.

B. ACCUSED INSTRUMENTALITIES

1. Volkswagen Accused Products

a. '786 Patent

Blitzsafe is currently aware that the infotainment systems of the following accused Volkswagen brand Volkswagen automobiles infringe the '786 Patent:

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Jetta SportWagen

2010-2016 Volkswagen Golf

2010-2016 Volkswagen Golf R

2010-2016 Volkswagen Beetle

2010-2016 Volkswagen Passat

2010-2016 Volkswagen CC

2010-2016 Volkswagen Toureg

2010-2016 Volkswagen Tiguan

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Eos

b. '342 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Volkswagen brand Volkswagen automobiles infringe the '342 Patent:

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Jetta SportWagen

2010-2016 Volkswagen Golf

2010-2016 Volkswagen Golf R

2010-2016 Volkswagen Beetle

2010-2016 Volkswagen Passat

2010-2016 Volkswagen CC

2010-2016 Volkswagen Toureg

2010-2016 Volkswagen Tiguan

2010-2016 Volkswagen Jetta

2010-2016 Volkswagen Eos

2. Audi Brand Accused Products

a. '786 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Audi brand Volkswagen automobiles infringe the '786 Patent:

2013-2016 Audi A3/S3

2009-2016 Audi A4/S4/A5/S5/RS5

2009-2016 Audi A6/S6/A7/S7/RS7

2009-2016 Audi A8/S8

2012-2016 Audi Q3

2009-2016 Audi Q5/SQ5

2009-2016 Audi Q7

2009-2016 Audi TT/TT-s/TT-RS

2009-2016 Audi R8

b. '342 Patent:

Blitzsafe is currently aware that the infotainment systems of the following accused Audi brand Volkswagen automobiles infringe the '342 Patent:

2013-2016 Audi A3/S3

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