

**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, <i>et al.</i> ,	§	
	§	
Defendants.	§	
	§	

**DECLARATION OF PETER LAMBRIANAKOS IN SUPPORT OF PLAINTIFF’S
RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO STAY**

I, Peter Lambrianakos, hereby declare as follows:

1. I am a partner 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 Plaintiff’s Response in Opposition to Defendants’ Motion Stay. I am familiar with the facts set forth herein.

2. Attached as Exhibit A is a true and correct copy of the petition filed on October 30, 2015, by Unified Patents Inc. against certain claims of U.S. Patent No. 8,155,342 in IPR2016-00118.

3. Attached as Exhibit B is a true and correct copy of a proposed stipulation filed on March 15, 2016, by Unified Patents Inc. in IPR2016-00118.

4. Attached as Exhibit C is a true and correct copy of the order denying institution of IPR2016-00118 entered by the PTAB on April 27, 2016.

5. Attached as Exhibit D is a true and correct copy of the order denying institution of IPR2016-00422 entered by the PTAB on July 6, 2016.

6. Attached as Exhibit E is a true and correct copy of the order denying institution of IPR2016-00419 entered by the PTAB on July 19, 2016.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of September, 2016.

/s/ Peter Lambrianakos
Peter Lambrianakos