

EXHIBIT B



William H. Mandir

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VIA EMAIL

Peter Lambrianakos
Brown Rudnick LLP
Seven Times Square
New York, NY 10036

Blitzsafe Texas, LLC v. Toyota Motor Corp., et al
Case No. 2:15-cv-1277-JRG-RSP

Dear Peter:

We are writing because it has come to our attention that Mr. Vincent Rubino recently took the deposition of a 30(b)(6) witness in Blitzsafe's district court litigation against Honda.

As you probably know, Mr. Rubino was formerly an associate with the law firm of Kenyon & Kenyon prior to joining your firm. As you also probably know, while at Kenyon, Mr. Rubino was involved in representing Toyota in numerous patent litigations. As a result of these patent litigations, Mr. Rubino was privy to Toyota's defense strategies as well as numerous other confidential and privileged documents and communications. He also had meetings involving defense strategies with at least one of Toyota's designated 30(b)(6) witnesses. As a result of Mr. Rubino's prior representation of Toyota, it is our view that his involvement or consultation in any patent litigation or Inter Partes Review proceeding against Toyota would constitute a conflict of interest.

Therefore, we request that you immediately confirm that Mr. Rubino has not been involved with or consulted in Blitzsafe's district court litigation against Toyota, or the pending IPRs involving Toyota. Further, we request that you immediately confirm that Mr. Rubino will not in the future become involved or consult with others in any aspect of Blitzsafe's litigation against Toyota or the IPRs filed by Toyota.

We look forward to your response.

Very truly yours,

A handwritten signature in black ink that reads 'William H. Mandir'.

William H. Mandir

WHM:gbh