

# EXHIBIT C



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August 23, 2016

VIA EMAIL (WMANDIR@SUGHRUE.COM)

William H. Mandir, Esq.  
Sughrue Mion PLLC  
2100 Pennsylvania Avenue, NW  
Washington, D.C. 20037

RE: Blitzsafe Texas LLC v. Toyota Motor Corp., et al.  
Case No. 2:15-cv-01277-JRG-RSP

Dear Bill:

We received your letter of August 14, 2016, concerning our associate, Vincent J. Rubino, III, in which you contend that “his involvement or consultation in any patent litigation or Inter Partes Review proceeding against Toyota would constitute a conflict of interest.” You ask that we confirm that Mr. Rubino has had no involvement, and will have no involvement, in Blitzsafe’s district court litigation against Toyota, or Toyota’s IPR’s against the Blitzsafe patents.

We have carefully reviewed the case law in the Federal courts and the PTAB and are aware of no basis for your allegation that Mr. Rubino’s involvement in these matters would constitute a conflict of interest. Your letter identifies no case law and no facts that raise a plausible claim that any conflict of interest would result from his involvement in these matters. If you have any specific facts to support a contention that Mr. Rubino possesses relevant, confidential information such that there is a reasonable probability that the information could be used to Toyota’s disadvantage, we request that you identify that information so that we can assess the merits of your request. The general allegations in your letter, even if true, do not approach the standards for a conflict of interest in Federal court or the PTAB.

Since we assume that you have thoroughly investigated this issue prior to sending your letter, we expect to hear from you by the end of the week. If we do not have your reply by August 26, 2016, setting forth specific facts and applicable case law, we will assume that this issue is closed.

Sincerely,

BROWN RUDNICK LLP

Peter Lambrianakos

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