

1
2
3
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BLITZSAFE TEXAS, LLC)
 Plaintiff)
vs.) NO. 2:15-CV-1274-JRG-RSP
) LEAD CASE
HONDA MOTOR CO. LTD, ET)
AL)
 Defendants)

PLAINTIFF BLITZSAFE TEXAS, LLC'S MOTION TO COMPEL THE
TOYOTA DEFENDANTS TO PROVIDE RELEVANT DISCOVERY

UNITED STATES MAGISTRATE JUDGE ROY S. PAYNE

SEPTEMBER 27, 2016

COURT REPORTER: Ms. Tammy L. Goolsby
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	INDEX	
		PAGE
1		
2		
3	Appearances	2
4	Index	3
5	Proceedings	4
6	Plaintiff's Argument by Mr. Lambrianakos	4
7	Defendants' Argument by Mr. Mandir	14
8	Reporter's Certificate	23
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
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1 P R O C E E D I N G S

2

3 THE COURT: Good afternoon. Please be
4 seated.

5 For the record we're here for the motion
6 hearing in Blitzsafe Texas versus Honda Motor Company,
7 et al, and specifically Toyota, which is under
8 Consolidated Civil Action 2:15-1274.

9 Would counsel state their appearances for
10 the record?

11 MR. BAXTER: Sam Baxter, Peter
12 Lambrianakos, we're here. We're ready, Your Honor.

13 THE COURT: Thank you, Mr. Baxter.

14 MR. HEARTFIELD: Good afternoon. Thad
15 Heartfield and William Mandir for Toyota, we're ready.

16 THE COURT: All right. Thank you, Mr.
17 Heartfield.

18 All right. This is Plaintiff's motion,
19 so I'll be happy to hear from Plaintiff first.

20 MR. LAMBRIANAKOS: Good afternoon, Your
21 Honor. Peter Lambrianakos of Brown Rudnick for the
22 Plaintiff.

23 We're asking the Court to compel
24 production of information regarding Toyota's USB box.
25 Specifically what we're requesting is an identification

1 of those vehicles in which the USB box was installed and
2 the numbers of USB boxes which were actually installed
3 in those vehicles.

4 That's slightly different than what we
5 had put in our brief, but at this juncture in the case,
6 we believe that that is the minimal information that
7 we're going to need in order to be able to take the USB
8 box information into account in our expert reports.

9 To put this into context, Your Honor, the
10 USB box is very important to this case because we
11 believe it is infringing interface under the Court's
12 construction of interface for the 786 patent.

13 The Court's construction requires that
14 the interface be functionally and structurally separate
15 from the car radio, and that's what the USB box is.

16 It is a self-contained box that is
17 separate from the car radio which has connectors that
18 connect the interface the USB box to the car radio and
19 then permit that interface to also connect to a portable
20 device, so the portable device will be integrated with
21 the car radio, so the USB box is a very important aspect
22 of this case and it's a very important product.

23 Now, in our infringement contentions, we
24 identified all of the Toyota vehicles which we believe
25 had the -- the infringing functionality in this case

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