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

	§	
BLITZSAFE TEXAS, LLC,	§	
	§	Case No. 2:15-cv-01274-JRG-RSP
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	LEAD CASE
HONDA MOTOR CO., LTD., ET AL,	§	
	§	
	§	
Defendants.	ş	

UNOPPOSED MOTION FOR A HEARING ON DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON NONCOMPLIANCE WITH MARKING REQUIREMENTS UNDER 35 U.S.C. § 287(a)

Moving Defendants American Honda Motor Co., Inc., Honda of America Mfg., Inc., Honda Manufacturing of Alabama, LLC, Honda Manufacturing of Indiana, LLC, Hyundai Motor America, Hyundai Motor Manufacturing Alabama, LLC, Kia Motors America, Inc., Kia Motors Manufacturing Georgia, Inc., Nissan North America, Inc., Nissan Motor Co., Ltd., Toyota Motor Corporation, Toyota Motor Sales U.S.A., Inc., Toyota Motor Manufacturing, Texas, Inc., Toyota Motor Manufacturing Kentucky, Inc., and Toyota Motor Manufacturing Mississippi, Inc. (collectively "Defendants") hereby move for a hearing in connection with Defendants' Motion for Partial Summary Judgment on Noncompliance with Marking Requirements Under 35 U.S.C. § 287(a) filed on October 27, 2016. Oral argument would be helpful to the Court in deciding this motion for Summary

Judgment, which involves important issues of law and fact. Plaintiff does not oppose this motion.

Dated: October 31, 2016

DOCKET

Respectfully submitted,

/s/ J. Thad Heartfield

William H. Mandir (pro hac vice)
John F. Rabena (pro hac vice)
Yoshinari Kishimoto (pro hac vice)
Brian K. Shelton (pro hac vice)
Fadi N. Kiblawi (pro hac vice)
Margaret M. Welsh (pro hac vice)
SUGHRUE MION PLLC
2100 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 293-7600

J Thad Heartfield State Bar No. 09346800 THE HEARTFIELD LAW FIRM 2195 Dowlen Rd Beaumont, TX 77706 409-866-3318 Fax: 409-866-5789 Email: thad@heartfieldlawfirm.com

Attorneys for Toyota Defendants

Find authenticated court documents without watermarks at docketalarm.com.

<u>/s/Joseph M. Beauchamp</u> Joseph M. Beauchamp Texas State Bar No. 24012266 Email: jmbeauchamp@jonesday.com H. Albert Liou Texas State Bar No. 24061608 Email: aliou@jonesday.com Erin C. Dickerman 24087358 Texas State Bar No. Email: edickerman@jonesday.com JONES DAY 717 Texas Street, Suite 3300 Houston, Texas 77002-2712 Telephone: (832) 239-3939 Facsimile: (832) 239-3600

Joseph Melnik California State Bar No. 255601 Email: jmelnik@jonesday.com JONES DAY 1755 Embarcadero Road Palo Alto, California 94303 Telephone: (650) 739-3939 Facsimile: (650) 739-3900

Randy Akin Texas State Bar No. 00954900 Email: gra@randyakin.com G.R. (Randy) Akin, P.C. 3400 W. Marshall Avenue, Suite 300 Longview, Texas 75604 Telephone: (903) 297-8929 Facsimile: (903) 297-9046

ATTORNEYS FOR DEFENDANTS AMERICAN HONDA MOTOR CO., INC.; HONDA OF AMERICA MFG., INC.; HONDA MANUFACTURING OF ALABAMA, LLC; AND HONDA MANUFACTURING OF INDIANA, LLC

DOCKET

/s/ Paul R. Steadman

Paul R. Steadman Illinois Bar No. 6238160 paul.steadman@dlapiper.com Matthew D. Satchwell Illinois Bar No. 6290672 matthew.satchwell@dlapiper.com DLA PIPER LLP 203 N. LaSalle St., Suite 1900 Chicago, IL 60601-1293 Telephone: 312.368.2111 Facsimile: 312.236.7516

Patrick S. Park California Bar No. 246348 patrick.park@dlapiper.com DLA PIPER LLP 20000 Avenue of the Stars, Suite 400 North Tower Los Angeles, CA 90067 Telephone: 310.595.3000 Facsimile: 310.595.3300

ATTORNEYS FOR DEFENDANTS HYUNDAI MOTOR AMERICA, HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC, KIA MOTORS AMERICA, INC., and KIA MOTORS MANUFACTURING GEORGIA, INC.

DOCKET

<u>/s/ Sean N. Hsu</u> Jeffrey S. Patterson (Lead Counsel) Texas Bar No. 15596700 Keith M. Lews Texas Bar No. 24083388 HARTLINE DACUS BARGER DREYER LLP 8750 N. Central Expwy., Suite 1600 Dallas, TX 75231 Telephone: (214) 369-2100 Facsimile: (214) 369-2118 jpatterson@hdbdlaw.com klewis@hdbdlaw.com

Sean N. Hsu State Bar No. 24056952 Rajkumar Vinnakota State Bar No. 24042337 Glenn E. Janik State Bar No. 24036837 JANIK VINNAKOTA LLP Gateway Tower 8111 LBJ Freeway, Suite 790 Dallas, TX 75251 Tel.: 214.390.9999 Fax: 214.586.0680 shsu@jvllp.com kvinnakota@jvllp.com gjanik@jvllp.com

ATTORNEYS FOR DEFENDANTS NISSAN NORTH AMERICA, INC. AND NISSAN MOTOR CO., LTD.

A L A R M Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

DOCKET

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.