

EXHIBIT B

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

BLITZSAFE TEXAS, LLC,

Plaintiff,

v.

HONDA MOTOR CO., LTD., ET AL.,

Defendants.

Case No. 2:15-CV-1274-JRG-RSP

LEAD CASE

JURY TRIAL DEMANDED

HYUNDAI AND KIA'S PRELIMINARY OPENING PRETRIAL DISCLOSURES

Pursuant to the Federal Rules of Civil Procedure and this Court's Amended Docket Control Order (Dkt. No. 286), Hyundai and Kia Defendants¹ ("Defendants") hereby submit the following pretrial disclosures for the issues on which they bear the burden of proof. These disclosures are preliminary and subject to amendment.

Defendants' opening pretrial disclosures (including identification of witnesses, deposition designations, and proposed exhibit list) are based on Defendants' assessment of the case at this time and without the benefit of the Court's rulings on various matters, including partial summary judgment motions, Motion to Dismiss for Insufficient Service of Process, Motion for Judgment on the Pleadings Pursuant to Title 35 USC Section 101, and yet-to-be-filed motions *in limine*. Defendants also do not know the nature and/or scope of the testimony and evidence that Plaintiff intends to present. Defendants have not yet seen Plaintiff's preliminary witness list, exhibit list, or deposition designations. Accordingly, Defendants reserve the right to modify, amend, and supplement these disclosures based on case developments, including but not limited to the right to:

¹ Hyundai Motor America ("HMA"), Hyundai Motor Manufacturing Alabama, LLC ("HMMA"), Kia Motors America, Inc. ("KMA"), and Kia Motors Manufacturing Georgia, Inc. ("KMMG") (collectively "Hyundai and Kia"). Hyundai Motor Corporation and Kia Motor Company are not parties to this litigation.

(i) call or not call one or more of the witnesses identified; (ii) call live or by deposition any witness identified on the witness list provided by Plaintiff; (iii) call any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which any opposing party objects (including but not limited to custodians of records); (iv) disclose additional witnesses to testify live or by deposition; (v) introduce deposition testimony as impeachment evidence; (vi) disclose additional exhibits; and (vii) not introduce some or all exhibits identified. Defendants reserve the right to object to any exhibits offered by Plaintiff, even if it appears on Defendants' list, if the exhibit is not one which Plaintiff is allowed to offer under any of the Federal Rules. Defendants further note that their identification of witnesses and exhibits herein is not an admission that any witness' testimony would be admissible if proffered by Plaintiff. Defendants reserve the right to cross-examine any witness called to testify by any opposing party or any other party, regardless of whether the witness is disclosed on this witness list, including without limitation by counter-designation of proffered deposition testimony.

Consistent with the Court's Docketing Control Order, Defendants only identify trial exhibits herein for which they have the burden of proof. While Blitzsafe has the burden of proof on the issue of patent marking, Defendants are including pertinent witnesses on this issue out of an abundance of caution in light of Blitzsafe's argument that defendants have the burden of proof on marking. See, e.g., Plaintiff's Response to MSJ of Noncompliance with Marking Requirements at 1, Document No. 248 (Nov 14, 2016).

A. DEFENDANTS' OPENING WITNESS LIST

Defendants hereby identify the following trial witnesses they may call live or by deposition for the issues on which they bear the burden of proof. Defendants further reserve the right to call the identified witnesses for any other issue.

Witness	Topic	Will / May Call	Deposed / Not Deposed
Chris Kyriakakis, Ph.D.	Matters disclosed in Mr. Kyriakakis' expert reports	Will Call Live	Not Deposed
Thomas G. Matheson, Ph.D.	Matters disclosed in Mr. Matheson's expert reports	Will Call Live	Not Deposed
Todd Schoettlekotte	Matters disclosed in Mr. Schoettlekotte's expert reports	Will Call Live	Not Deposed
Edward Fischer	Matters identified in Mr. Fisher's deposition	Will Call by Deposition	Deposed
Dimitriy Kiryashov	Matters identified in Mr. Kiryashov's deposition	Will Call by Deposition	Deposed
Ronald Freeman	Matters identified in Mr. Freeman's deposition	Will Call by Deposition	Deposed
Ira Marlowe	Information relating to the Plaintiff, the asserted patents, and the claims and defenses in this case.	Will Call by Deposition	Deposed

B. OTHER WITNESSES

Defendants hereby identify the following trial witnesses they may call live or by deposition for other issues. Defendants further reserve the right to call the identified witnesses for any other issue.

Witness	Topic	Will / May Call	Deposed / Not Deposed
Zafar Brooks	Information related to Hyundai Motor America	May Call Live	Not Deposed
Scott Margason	Information related to Defendants and/or accused head units in this case.	May Call Live	Not Deposed

Cason Grover	Information related to Defendants and/or accused head units in this case.	Will Call Live	Deposed
Henry Bzeih	Information related to Defendants and/or accused head units in this case.	Will Call Live	Deposed
James Carter	Information relating to damages	May Call Live	Not Deposed
Dawn Becker	Information relating to damages	May Call Live or by Deposition	Deposed
James Lee	Information relating to damages	May Call Live	Not Deposed
David Schoonover	Information relating to damages	May Call Live	Not Deposed
Ui Dong Lee	Information related to the accused products in this case.	May Call Live	Not Deposed

B. DEFENDANTS' OPENING EXHIBIT LIST

Defendants identify their Preliminary Opening Exhibit List in the attached Exhibit A.

C. DEFENDANTS' OPENING DEPOSITION DESIGNATIONS

Defendants identify their Preliminary Opening Deposition Designations in the attached Exhibit B.

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