

EXHIBIT B

Defendants' P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. 7,489,786 AND 8,155,342				
ASSERTED CLAIM	CLAIM TERM	DEFENDANTS' PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ¹	
'786 Patent, Claims 1, 5, 6, 10, 14, 23, 44, 57, 64, 86, 88, 92, 97	"interface"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an after-market device with a car stereo"	'786 patent at 1:5-12, 1:36-39, 1:60-64, 2:28-32, 3:1-5, 4:26-32, 4:47-56, 5:1-5, 5:15-19, 5:38-55, FIGS. 1, 2A-2H, 3A-3D; 9/5/2006 Response to Office Action, at page 23 (BLITZSAFE-0010207); 9/6/2007 Response to Office Action, at pages 2-31 (BLITZSAFE-0010515-BLITZSAFE-0010544); 2/20/2008 Office Action at pages 5-6 (BLITZSAFE-0010561-BLITZSAFE-0010562); U.S. Patent Application 11/071,667.	For cor op tra evi Fo liti
'786 Patent, Claims 1, 44, 57, 90, 92 '342 Patent, Claims 53, 77, 97	"format incompatible with the [after-market audio device, portable device, video device, portable audio device, MP3 player]"	<u>Honda's Proposed Construction:</u> For "format incompatible with the [after-market audio device, portable device, video device, portable audio device, MP3 player]": "format alien to and inoperable with the [after-market audio device, portable device, video device, portable audio	'786 patent at 1:60-64, 2:22-29, 4:64-67; '342 patent at 2:18-23, 2:58-67, 9:17-20; 9/5/2006 Response to Office Action at pages 21-23 (BLITZSAFE-0010205-BLITZSAFE-0010207); 2/14/2007 Response to Office Action at pages 26-31 (BLITZSAFE-0010299-BLITZSAFE-0010304); 6/28/2007	

¹ Defendants' citations to the intrinsic evidence below are exemplary in nature. Defendants reserve the right to rely on other portions of the intrinsic disclosures of, or statements made or prior art cited during prosecution of, the '786 patent or '342 patent, should they become relevant, based on otherwise.

² References in this Exhibit to extrinsic evidence cited by the parties in the *Ford* and *Dice Electronics* litigation include, but are not limited to, all identified in Docket Entries 87, 89, 90, 93, 99, 102, 104, 105, 106, 107, and 108, and all exhibits thereto, from *Marlowe Patent Holdings LLC v. Ford*, Case No. 15-cv-07044-PGS-DEA (D.N.J.); and in Docket Entries 139, 143, 149, 150, 151, 155, 156, 158, 221, and 222, and all exhibits thereto, from *Marlowe Patent Holdings LLC v. Ford*, Case No. 15-cv-07044-PGS-DEA (D.N.J.).

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. 7,489,786 AND 8,155,342

ASSERTED CLAIM	CLAIM TERM	DEFENDANTS' PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ¹	
'786 Patent, Claims 1, 60 '342 Patent, Claims 54, 70, 78, 120	"format incompatible with the [car stereo / car audio/video system]"	device, MP3 player]" For "format incompatible with the [car stereo / car audio/video system]": "format alien to and inoperable with an existing [car stereo or car audio/video system]" <u>Hyundai, Kia, Nissan, Toyota, and Volkswagen's Proposed Construction (for both claim terms):</u> "a format that the OEM or factory-installed car stereo was not designed to use when communicating with an after-market device"	Response to Office Action at pages 26-37(BLITZSAFE-0010428-BLITZSAFE-0010439); 9/6/2007 Response to Office Action at page 36 (BLITZSAFE-0010549); 1/29/2012 Response to Office Action at pages 36-40 (BLITZSAFE-0012199-BLITZSAFE-0012203).	
'342 Patent, Claims 49, 50, 53-57, 66, 70, 73, 74, 77-80, 94, 97, 99, 102, 103, 106, 113, 120	"integration subsystem"	<u>Honda, Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u> Indefinite. This is a functional claim limitation subject to § 112, ¶ 6. Function: ³	'342 patent at 34:63-35:1; FIG. 24.	De tes '34 su un fai wr inv

³ The functions performed by the integration subsystem in claims 49 and 73 are: (1a) obtaining, using a wireless communication link, information (claim 49) or received (claim 73) on the portable device; (2a) transmitting the information to the car audio/video system for subsequent display; (3a) i play the audio file in response to a user selecting the audio file; and (4a) receiving audio generated by the portable device over the wireless com

The functions of the integration subsystem in claim 97 are: (1b) channeling audio generated by the portable device to the car audio/video system link; (2b) receiving a control command from a user in a format incompatible with the portable device; (3b) processing the control command int portable device; and (4b) dispatching the formatted command to the portable device.

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. 7,489,786 AND 8,155,342

ASSERTED CLAIM	CLAIM TERM	DEFENDANTS' PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ¹	
		<p>Structure: "a microprocessor programmed to perform the method of FIG. 24"</p> <p>The specification fails to disclose a sufficient algorithm or other structure that performs this function; thus, the claims are invalid under § 112, ¶ 2. Alternatively, the claims are invalid under § 112, ¶ 1 for failing to sufficiently provide a written description of the invention and/or enable a person of ordinary skill in the art to make and use the invention.</p>		per art inv
<p>'786 Patent, Claims 6, 57, 86, 92</p> <p>'342 Patent, Claims 56, 106</p>	<p>"device presence signal"</p>	<p>"a continuous signal indicating an audio device is present"</p>	<p>'786 patent at 1:60-64, 2:29-35, 4:47-56, 12:15-36, 13:12-19, 13:59-66, 14:48-52, 15:35-42, 16:12-15, 16:57-60; 20:5-10; 20:19-35, FIGS. 2A-2H; '342 patent at 2:18-23, 2:67-3:6, 8:63-9:7, 16:50-62, 17:46-54, 20:9-15, 20:57-63, 21:39-45, 25:49-54, 25:63-26:11, FIG. 4A-4C; U.S. Patent Application 11/071,667.</p>	Fo co op tra evi Fo liti

The functions of the integration subsystem recited in claim 120 are: (1c) channeling audio generated by the portable device to the car audio/video communication link; (2c) receiving data from the portable device in a format incompatible with the car audio/video system; (3c) processing the data from the car audio/video system; and (4c) transmitting the processed data to the car audio/video system.

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. 7,489,786 AND 8,155,342

ASSERTED CLAIM	CLAIM TERM	DEFENDANTS' PROPOSED CONSTRUCTION	INTRINSIC SUPPORT¹	
'786 Patent, Claims 1, 14	"auxiliary input source"	"a device that outputs audio by headphone jack or other connector"	'786 patent at 2:22-29, 2:60-67, 6:44-7:61; FIGS. 2D, 2E, 2F, 2G.	For con op tra evi Fo liti
'786 Patent, Claims 1, 7, 8, 44, 57, 60, 86, 90, 91, 92	"pre-programmed"	"programmed prior to its use in the normal course"	'786 patent at 10:1-12, 11:47-56; 2/20/2008 Office Action at pages 3-5, 10-11 (BLITZSAFE-0010559-BLITZSAFE-0010561, BLITZSAFE-0010566-BLITZSAFE-0010567); 4/21/2008 Response to Office Action at pages 29-32 (BLITZSAFE-0010646-0010649); 7/31/2008 Notice of Allowability at pages 2-3 (BLITZSAFE-0010979-0010980); US2002/0084910 (Owen); US6,175,789 (Beckert).	For con op tra evi Fo liti
'786 Patent, Claims 1, 57, 86 and 92 '342 Patent, Claims 49, 73, 97, 120	"external"	"an after-market device that is outside and alien to the environment of an OEM or after-market stereo system"	'786 patent at 1:5-12, 1:16-20, 1:33-35, 1:45-54, 2:32-35, 2:50-52, 4:26-32, 4:59-67, 6:66-7:3, 8:22-27, 12:32-39, 15:35-67, 16:15-45, 16:60-17:27, FIGS. 1 and 2; '342 patent at 1:18-28, 1:32-36, 1:51-53, 1:67-2:6, 2:11-15, 3:3-6, 3:21-24, 7:62-64, 8:38-46, 9:10-20, 11:26-30, 12:49-54, 16:58-61, 20:9-44, 20:57-21:26, 21:39-22:6, FIGS. 1, 2, 17; 9/5/2006 Response to Office Action at page 21, 23	For con op tra evi Fo liti

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.