

# EXHIBIT D

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.

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

(LEAD CASE)

JURY TRIAL DEMANDED

**PRELIMINARY IDENTIFICATION OF EXPERT TESTIMONY  
REGARDING INDEFINITE CHALLENGE**

Pursuant to Patent Rule 4-3 and the Court’s Docket Control Order of January 8, 2016 (Dkt. 56), Plaintiff Blitzsafe Texas, LLC, being subject to an indefiniteness challenge, provides a preliminary identification of expert testimony it may rely on its response to any such indefiniteness challenge brought by Defendants and a brief description of the proposed testimony. Plaintiff reserves the right to supplement this information as additional information becomes available or should the scope of the cases or issues change. Plaintiff further reserves the right to supplement this information to identify additional expert witnesses or testimony to rebut any expert testimony or factual testimony offered by Defendants.

Mr. Joseph McAlexander has expertise in various areas, including those generally described in his curriculum vitae, which has been separately provided to Defendants. He intends to provide testimony regarding the understanding of one of ordinary skill in the art at the time of the inventions at issue relevant to the asserted claims of the U.S. Patent Nos. 7,489,786

(the “’786 patent”) and 8,155,342 (the “’342 patent”) and any indefiniteness challenges to the asserted claims.

Mr. McAlexander may opine on any position taken by Defendants’ experts related to an indefiniteness challenge to the ’342 patent. In particular, Mr. McAlexander may opine on whether the term “integration subsystem” would have been understood by persons of ordinary skill in the art to have a sufficiently definite meaning as the name for structure. Mr. McAlexander may also opine on whether the claims and/or the specification of the ’342 patent disclose sufficient structure to one of ordinary skill in the art for performing any alleged functions of the claims as proposed by Defendants, such as, for example, the structure identified in Plaintiff’s chart accompanying this disclosure as Exhibit A.

Dated: April 1, 2016

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/s/ Peter Lambrianakos

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