

**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**

**PLAINTIFF BLITZSAFE TEXAS LLC'S OPENING CLAIM CONSTRUCTION BRIEF**

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Pursuant to P.R. 4-5(a) and the Court's January 8, 2016, Docket Control Order (Dkt. 56), Plaintiff Blitzsafe Texas, LLC ("Blitzsafe") hereby submits its Opening Claim Construction Brief. The asserted patents in the above-captioned matter are U.S. Patent Nos. 7,489,786 (the "'786 Patent") and 8,155,342 (the "'342 Patent") (together, the "asserted patents"). The inventor of the '786 Patent and the '342 Patent is Ira Marlowe.

## **I. CLAIM CONSTRUCTION STANDARD OF REVIEW**

### **A. Governing Law.**

The governing legal standards relating to claim construction are described, for example, in the Court's opinion in *Seoul Semiconductor Co. Ltd. v. Nichia Corp.*, 596 F. Supp. 2d 1005 (E.D. Tex. 2009), and are hereby incorporated by reference.

### **B. Level of Ordinary Skill in the Art**

The "Field of Disclosure" is described generally as "an audio device integration system" in the '786 Patent and the '342 Patent. The detailed descriptions of the inventions and the claims of the asserted patents draw on a combination of skills. Blitzsafe submits that a person of ordinary skill in the art covered by the patents in suit would have a 4-year degree in Electrical Engineering (EE) or Computer Science (with course work in, or a working understanding of, EE), and at least 2 years' experience designing or analyzing electronic devices with interfaces, including integration of components for such devices and experience with media communication in the context of automotive applications. Extensive experience and technical training may substitute for educational requirements, while advanced education might substitute for experience.

## **II. PATENT BACKGROUND AND TECHNOLOGY**

### **A. Overview of the '786 Patent**

The '786 Patent issued on Feb. 10, 2009, from Application No. 10/316,961 (the "'961 Application"), filed on December 11, 2002. The '786 Patent pertains to an audio device integration system that enables after-market audio products which are not specifically designed for use in an automobile, such as CD players, CD changers, MP3 players, satellite receivers, digital audio broadcast receivers, and auxiliary input sources to be connected to, operated with, and be controlled from, an existing stereo system in an automobile. The interface allows vehicle users to seamlessly integrate one or more portable electronic devices with an automobile stereo system such that the user can access, manage, and communicate audio and video content using the automobile's controls, and to enjoy audio and video generated by the external device via the car stereo's speakers and display. The '786 Patent provides the convenience of integrating an array of audio devices into one centrally-controlled system, saving users the distraction and annoyance of toggling between the controls of incompatible components.

### **B. Overview of the '342 Patent**

The '342 Patent was issued from a continuation-in-part application claiming priority to the '961 Application. *See* '342 Patent, "Related U.S. Application Data." The '342 Patent relates to a multimedia device integration system that allows a plurality of portable electronic devices to be wirelessly integrated into an existing car stereo system via an integration subsystem while allowing information to be displayed on, and control to be provided from, the car stereo. *See*, the '342 Patent, at 2:44–54, 33:43–46; Abstract. The integration subsystem can be positioned in communication with the portable device or in communication with the car audio/video system, allowing data and control signals to be exchanged between the portable device and the car

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