

**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

JOINT CLAIM CONSTRUCTION CHART

In accordance with Patent Rule 4-5(d) and the Court’s Docket Control Order of January 8, 2016 (Dkt. 56), the parties to the above-captioned case provide the following Joint Claim Construction Chart that includes the disputed claim terms and phrases, the parties’ respective proposed claim constructions, and a column for the Court’s construction of the disputed claim terms and phrases.

Dated: June 10, 2016

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 10th day of June, 2016.

/s/ *Peter Lambrianakos*
Peter Lambrianakos

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE’S CONSTRUCTION	DEFENDANTS’ CONSTRUCTION¹	COURT’S CONSTRUCTION
Claim 1². An audio device integration system comprising:	“integration” / “integrating” Claims 1, 5, 57	[AGREED]	[AGREED]	“Connecting one or more external devices or inputs to an existing car radio or stereo via an interface, processing and handling signals and audio channels, allowing a user to control the devices via the car stereo, and displaying data from the devices on the radio.”
a first connector electrically connectable to a car stereo ;	“connector electrically connectable to” Claim 1	Plain Meaning	“connector capable of being physically and electrically connectable”	

¹ Unless otherwise noted, “Defendants” include Honda, Hyundai, Kia, Nissan, and Toyota. Volkswagen joins Defendants’ constructions of “interface” and “car stereo” only and does not propose constructions for the remainder of the disputed terms.

² Claims 1, 60, and 64 of the ’786 patent are not asserted by Blitzsafe, but other asserted claims are dependent upon these claims, and thus the parties request construction of certain claim terms appearing in these claims.

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	
<p>a second connector electrically connectable to an after-market audio device external to the car</p>	<p>"connector electrically connectable to"</p> <p>Claim 1</p>	<p>Plain Meaning</p>	<p>"connector capable of being physically and electrically connectable"</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
stereo;	"external" Claims 1, 57	"a device that is outside and alien to the environment of an OEM or after-market stereo system but for the inclusion of an interface"	"an after-market device that is outside and alien to the environment of an OEM or after-market stereo system" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	
<p>a third connector electrically connectable to one or more auxiliary input sources external to</p>	<p>"connector electrically connectable to"</p> <p>Claims 1</p>	<p>Plain Meaning</p>	<p>"connector capable of being physically and electrically connectable"</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
the car stereo and the after-market audio device;	"auxiliary input source" Claims 1, 14	[AGREED]	[AGREED]	"a device that outputs audio by headphone jack or other connector"
	"external" Claims 1, 57	"a device that is outside and alien to the environment of an OEM or after-market stereo system but for the inclusion of an interface"	"an after-market device that is outside and alien to the environment of an OEM or after-market stereo system" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE’S CONSTRUCTION	DEFENDANTS’ CONSTRUCTION¹	COURT’S CONSTRUCTION
an interface connected between said first and second electrical connectors for channeling audio signals to the car stereo from the after-market audio device,	“interface” Claims 1, 5, 6, 10, 14, 57, 64	“a device configured to integrate an external device with a car stereo”	“a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo” [This is the <i>Ford</i> court’s construction.]	
	“electrical connector” Claims 1, 5, 57	Plain Meaning	“connector capable of being physically and electrically connectable”	
	“channeling audio signals” / “audio signals ... are selectively channeled” Claims 1, 14	[AGREED]	[AGREED]	“receiving and transmitting audio”

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
said interface including a microcontroller in electrical communication with said first and second electrical connectors , said microcontroller pre-programmed to execute:	"interface" Claims 1, 5, 6, 10, 14, 57, 64	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	
	"electrical connector" Claims 1, 5, 57	Plain Meaning	"connector capable of being physically and electrically connectable"	
	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	
a first pre-programmed code portion for remotely controlling the after-market audio device using the car stereo by	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
receiving a control command from the car stereo through said first connector in a format incompatible with the after-market audio device , processing the received control command into a formatted command compatible with the after-market audio device, and transmitting the formatted command to the after-market audio device through said second connector for execution by the after-market audio device;	"car stereo" Claims 1, 6, 14, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"	"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'" [This construction was agreed by the parties in <i>Ford</i>.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>“format incompatible with the [after-market audio device, portable device, MP3 player]”</p> <p>Claims 1, 57</p>	<p>Plain Meaning</p>	<p><u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u></p> <p>“a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device”</p> <p><u>Honda's Proposed Construction:</u></p> <p>“format alien to and inoperable with the [after-market audio device, MP3 player, portable device]”</p>	
<p>a second pre-programmed code portion for receiving data from the after-market audio device through said</p>	<p>“pre-programmed”</p> <p>Claims 1, 7, 8, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: “programmed prior to its use”</p>	<p>“programmed prior to its use in the normal course”</p> <p>[This is the <i>Ford</i> court's construction.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ¹	COURT'S CONSTRUCTION
second connector in a format incompatible with the car stereo , processing the received data into formatted data compatible with the car stereo , and transmitting the formatted data to the car stereo through said first connector for display by the car stereo ; and	“format incompatible with the [car stereo, car audio/video system]” Claims 1, 60	Plain Meaning	<u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u> “a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device” <u>Honda's Proposed Construction:</u> “format alien to and inoperable with an existing [car stereo, car audio/video system]”	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ¹	COURT'S CONSTRUCTION
a third pre-programmed code portion for switching to one or more auxiliary input sources connected to said third electrical connector .	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	
	"auxiliary input source" Claims 1, 14	[AGREED]	[AGREED]	"a device that outputs audio by headphone jack or other connector"
	"electrical connector" Claims 1, 5, 57	Plain Meaning	"connector capable of being physically and electrically connectable"	
Claim 5. The apparatus of claim 1, wherein said interface further comprises a plug-and-play mode for automatically detecting a device type of the after-market audio device connected to said second electrical connector and integrating the after-market audio device based	"interface" Claims 1, 5, 6, 10, 14, 57	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	
	"electrical connector" Claims 1, 5, 57	Plain Meaning	"connector capable of being physically and electrically connectable"	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ¹	COURT'S CONSTRUCTION
upon the device type.	"integration" / "integrating" Claims 1, 5, 57	[AGREED]	[AGREED]	"Connecting one or more external devices or inputs to an existing car radio or stereo via an interface, processing and handling signals and audio channels, allowing a user to control the devices via the car stereo, and displaying data from the devices on the radio."
Claim 6. The apparatus of claim 1, wherein said interface generates a device presence signal for maintaining the car stereo in a state responsive to processed data and audio signals.	"interface" Claims 1, 5, 6, 10, 14, 57, 64	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	
	"device presence signal" Claims 6, 57	Plain Meaning Or if the Court believes that this term requires construction, then: "a signal indicating an audio device is present"	"a continuous signal indicating an audio device is present" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"maintaining . . . in a state responsive"</p> <p>Claim 6</p>	<p>Plain Meaning</p>	<p>"preventing the car stereo from shutting off, entering a sleep mode, or otherwise being unresponsive to signals and/or data from an external source"</p>	
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
Claim 7. The apparatus of claim 1, wherein said second pre-programmed code portion processes data generated by the after-market audio device including track and time information.	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	
Claim 8. The apparatus of claim 1, wherein said second pre-programmed code portion processes data generated by the after-market audio device including song title and artist information.	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	
Claim 10. The apparatus of claim 1, wherein said interface processes video information generated by the after-market audio device.	"interface" Claims 1, 5, 6, 10, 14, 57, 64	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE’S CONSTRUCTION	DEFENDANTS’ CONSTRUCTION¹	COURT’S CONSTRUCTION
	“video information” Claim 10	Plain Meaning	“moving visual images”	
Claim 14. The apparatus of claim 1, wherein audio signals from the one or more auxiliary input sources are selectively channeled to the car stereo by said interface.	“channeling audio signals” / “audio signals ... are selectively channeled” Claims 1, 14	[AGREED]	[AGREED]	“receiving and transmitting audio”
	“auxiliary input source” Claims 1, 14	[AGREED]	[AGREED]	“a device that outputs audio by headphone jack or other connector”

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	"interface" Claims 1, 5, 6, 10, 14, 57, 64	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	
Claim 57. An audio device integration system comprising:	"integration" Claims 1, 5, 44, 57	[AGREED]	[AGREED]	"Connecting one or more external devices or inputs to an existing car radio or stereo via an interface, processing and handling signals and audio channels, allowing a user to control the devices via the car stereo, and displaying data from the devices on the radio."
a first electrical connector connectable to a car stereo ;	"electrical connector" Claims 1, 5, 57 "connectable" Claim 57	Plain Meaning	"connector capable of being physically and electrically connectable" For connectable: "able to be disconnected and connected"	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ¹	COURT'S CONSTRUCTION
a second electrical connector connectable to a portable MP3 player external to the car stereo an interface connected between said first and second electrical connectors for transmitting audio from a portable MP3 player to a car stereo ,	"electrical connector" Claims 1, 5, 57 "connectable" Claim 57	Plain Meaning	"connector capable of being physically and electrically connectable" For connectable: "able to be disconnected and connected"	
	"portable" Claim 57	Plain Meaning	"capable of being moved about" [This is the <i>Ford</i> court's construction.]	
	"external" Claims 1, 57	"a device that is outside and alien to the environment of an OEM or after-market stereo system but for the inclusion of an interface"	"an after-market device that is outside and alien to the environment of an OEM or after-market stereo system" [This is the <i>Ford</i> court's construction.]	
	"interface" Claims 1, 5, 6, 10, 14, 57, 64	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ¹	COURT'S CONSTRUCTION
said interface including a microcontroller in electrical communication with said first and second electrical connectors , said microcontroller pre-programmed to execute:	"interface" Claims 1, 5, 6, 10, 14, 57, 64	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	
	"electrical connector" Claims 1, 5, 57	Plain Meaning	"connector capable of being physically and electrically connectable"	
	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	
a first pre-programmed code portion for generating a device presence signal and transmitting the signal to	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
the car stereo to maintain the car stereo in an operational state ; and	“device presence signal” Claims 6, 57	Plain Meaning Or if the Court believes that this term requires construction, then: “a signal indicating an audio device is present”	“a continuous signal indicating an audio device is present” [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	
	<p>"maintain ... in an operational state"</p> <p>Claim 57</p>	[AGREED]	[AGREED]	<p>"maintain in a state responsive to processed data and audio signals from the external device"</p>

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
a second pre-programmed code portion for remotely controlling the MP3 player using the car	"pre-programmed" Claims 1, 7, 8, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "programmed prior to its use"	"programmed prior to its use in the normal course" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ¹	COURT'S CONSTRUCTION
stereo by receiving a control command from the car stereo through said first electrical connector in a format incompatible with the MP3 player , processing the control command into a formatted control command compatible with the MP3 player, and transmitting the formatted control command to the MP3 player through said second electrical connector for execution by the MP3 player.	"car stereo" Claims 1, 6, 14, 57, 60	Plain Meaning Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"	"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'" [This construction was agreed by the parties in <i>Ford</i>.]	
	"electrical connector" Claims 1, 5, 57	Plain Meaning	"connector capable of being physically and electrically connectable"	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ¹	COURT'S CONSTRUCTION
	<p>“format incompatible with the [after-market audio device, portable device, MP3 player]”</p> <p>Claims 1, 57</p>	Plain Meaning	<p><u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u></p> <p>“a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device”</p> <p><u>Honda's Proposed Construction:</u></p> <p>“format alien to and inoperable with the [after-market audio device, MP3 player, portable device]”</p>	
<p>Claim 60. The system of claim 57, wherein said microcontroller is pre-programmed to execute a third code portion for</p>	<p>“pre-programmed”</p> <p>Claims 1, 7, 8, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: “programmed prior to its use”</p>	<p>“programmed prior to its use in the normal course”</p> <p>[This is the <i>Ford</i> court's construction.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
receiving data from the MP3 player in a format incompatible with the car stereo , processing received data into formatted data compatible with the car stereo , and transmitting formatted data to the car stereo for display thereby.	“format incompatible with the [car stereo, car audio/video system]” Claims 1, 60	Plain Meaning	<u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u> “a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device” <u>Honda's Proposed Construction:</u> “format alien to and inoperable with an existing [car stereo, car audio/video system]”	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
	<p>"car stereo"</p> <p>Claims 1, 6, 14, 57, 60</p>	<p>Plain Meaning</p> <p>Or if the Court believes that this term requires construction, then: "components that process audio signals and produce audible output in a car"</p>	<p>"All presently existing car stereos and radios, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car stereo' and 'car radio.'"</p> <p>[This construction was agreed by the parties in <i>Ford</i>.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 7,489,786

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION¹	COURT'S CONSTRUCTION
Claim 64. The apparatus of claim 57, further comprising a bus connection established between the MP3 player and said interface .	"interface" Claims 1, 5, 6, 10, 14, 57, 64	"a device configured to integrate an external device with a car stereo"	"a microcontroller that is a functionally and structurally separate component from the car stereo, which integrates an aftermarket device with a car stereo" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE’S CONSTRUCTION	DEFENDANTS’ CONSTRUCTION³	COURT’S CONSTRUCTION
Claim 49. A multimedia device integration system, comprising:		Claim 49 is not indefinite under <i>IPXL Holdings, L.L.C. v. Amazon.com, Inc.</i> , 430 F.3d 1377 (Fed. Cir. 2005), because it does not claim both an apparatus and a method.	Claim 49 is indefinite for claiming both an apparatus and method in the same claim under <i>IPXL Holdings, L.L.C. v. Amazon.com, Inc.</i> , 430 F.3d 1377 (Fed. Cir. 2005).	
	“integration” / “integrating” Claims 49, 73	[AGREED]	[AGREED]	“Connecting one or more external devices or inputs to an existing car stereo or video system via an interface, processing and handling signals, audio, and/or video information, allowing a user to control the devices via the car stereo or video system, and displaying data from the devices on the car stereo or video system.”

³ Unless otherwise noted, “Defendants” include Honda, Hyundai, Kia, Nissan, and Toyota. Volkswagen joins Defendants’ construction of “car audio/video system” only and does not propose constructions for the remainder of the disputed terms.

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
an integration subsystem in communication with a car audio/video system ;	<p>“integration subsystem”</p> <p>Claims 49, 53, 54, 56, 57, 66⁴, 70, 73, 77, 78</p>	<p>“one or more components of a system or device configured to integrate an external device with a car audio/video system”</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i></p>	<p>Subject to 35 U.S.C. § 112(6)</p> <p>Indefinite.</p> <p>Alternatively, “a microprocessor programmed to perform the method of FIG. 24”</p>	

⁴ Claim 66 of the '342 patent is not asserted by Blitzsafe, but other asserted claims are dependent upon this claim, and thus the parties request construction of certain claim terms appearing in this claim.

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	<p>Plain Meaning</p>	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	
<p>and a first wireless interface in communication with said integration subsystem,</p>	<p>"integration subsystem"</p> <p>Claims 49, 53, 54, 56, 57, 70, 73, 77, 78</p>	<p>"one or more components of a system or device configured to integrate an external device with a car audio/video system"</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe</p>	<p>Subject to 35 U.S.C. § 112(6)</p> <p>Indefinite.</p> <p>Alternatively, "a microprocessor programmed to perform the method of FIG. 24"</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ³	COURT'S CONSTRUCTION
		agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i>		
said first wireless interface establishing a wireless communication link with a second wireless interface in communication with a portable device external to the car audio/video system ,	"portable" Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78	Plain Meaning	"capable of being moved about" [This is the <i>Ford</i> court's construction.]	
	"external" Claim 49, 73	"a device that is outside and alien to the environment of an OEM or after-market stereo system but for the inclusion of an interface"	"an after-market device that is outside and alien to the environment of an OEM or after-market stereo system" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	
<p>wherein said integration subsystem obtains, using said wireless communication link, information about an audio file stored on the portable device, transmits</p>	<p>"integration subsystem"</p> <p>Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78</p>	<p>"one or more components of a system or device configured to integrate an external device with a car audio/video system"</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe</p>	<p>Subject to 35 U.S.C. § 112(6)</p> <p>Indefinite.</p> <p>Alternatively, "a microprocessor programmed to perform the method of FIG. 24"</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ³	COURT'S CONSTRUCTION
the information to the car audio/video system for subsequent display of the information on a display of the car audio/video system , instructs the portable device to play the audio file in response to a user selecting the audio file using controls of the car audio/video system , and receives audio generated by the portable device over said wireless communication		agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i>		
	"portable" Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78	Plain Meaning	"capable of being moved about" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
link for playing on the car audio/video system.	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	
	<p>"generated . . . for playing on the car audio/video system"</p> <p>Claims 49, 73</p>	"produced by the portable device during playback"	<p>"produced by the portable device during playback as decoded audio signals without further decoding before being output through the car audio/video system"</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
<p>Claim 53. The system of claim 49, wherein said integration subsystem receives a control command issued at the car audio/video system in a format incompatible with the portable device, processes the control command into a formatted command compatible with the portable device, and dispatches the processed control command to the portable device for execution thereby.</p>	<p>“integration subsystem”</p> <p>Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78</p>	<p>“one or more components of a system or device configured to integrate an external device with a car audio/video system”</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: <i>See, e.g.,</i> ’342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</p>	<p>Subject to 35 U.S.C. § 112(6)</p> <p>Indefinite.</p> <p>Alternatively, “a microprocessor programmed to perform the method of FIG. 24”</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ³	COURT'S CONSTRUCTION
	<p>“format incompatible with the [after-market audio device, portable device, MP3 player]”</p> <p>Claims 53, 77</p>	Plain Meaning	<p><u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u></p> <p>“a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device”</p> <p><u>Honda's Proposed Construction:</u></p> <p>“format alien to and inoperable with the [after-market audio device, MP3 player, portable device]”</p>	
	<p>“portable”</p> <p>Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78</p>	Plain Meaning	<p>“capable of being moved about”</p> <p>[This is the <i>Ford</i> court's construction.]</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
Claim 54. The system of claim 49, wherein said integration subsystem receives data generated by the portable device in a format incompatible with the car audio/video system , processes the data into formatted data compatible with the car audio/video system , and transmits the processed data to the car audio/video system for subsequent display of the processed data on a display of the car audio/video system .	"integration subsystem" Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78	"one or more components of a system or device configured to integrate an external device with a car audio/video system" If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i>	Subject to 35 U.S.C. § 112(6) Indefinite. Alternatively, "a microprocessor programmed to perform the method of FIG. 24"	
	"portable" Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78	Plain Meaning	"capable of being moved about" [This is the <i>Ford</i> court's construction.]	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>“format incompatible with the [car stereo, car audio/video system]”</p> <p>Claims 54, 70, 78</p>	Plain Meaning	<p><u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u></p> <p>“a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device”</p> <p><u>Honda's Proposed Construction:</u></p> <p>“format alien to and inoperable with an existing [car stereo, car audio/video system]”</p>	

P.R. 4-5(d) DISCLOSURES FOR U.S. PATENT NO. 8,155,342

ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
Claim 56. The system of claim 49, wherein said integration subsystem generates a device presence signal and transmits the device presence signal to the car audio/video system to maintain the car audio/video system in a state responsive to the portable device .	“integration subsystem” Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78	“one or more components of a system or device configured to integrate an external device with a car audio/video system” If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants’ recitation of the function of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: <i>See, e.g.,</i> ’342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.	Subject to 35 U.S.C. § 112(6) Indefinite. Alternatively, “a microprocessor programmed to perform the method of FIG. 24”	
	“device presence signal” Claim 56	Plain Meaning Or if the Court believes that this term requires construction, then: “a signal indicating an audio device is present”	“a continuous signal indicating an audio device is present” [This is the <i>Ford</i> court’s construction.]	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>“car audio/video system”</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>“All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms ‘car audio/video systems.’”</p>	
	<p>“maintain . . . in a state responsive”</p> <p>Claim 56</p>	Plain Meaning	<p>“preventing the car stereo from shutting off, entering a sleep mode, or otherwise being unresponsive to signals and/or data from an external source”</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ³	COURT'S CONSTRUCTION
	<p>"portable"</p> <p>Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78</p>	Plain Meaning	<p>"capable of being moved about"</p> <p>[This is the <i>Ford</i> court's construction.]</p>	
<p>Claim 57. The system of claim 49, wherein said integration subsystem instructs said portable device to play a desired file in response to a spoken command processed by the voice recognition subsystem.</p>	<p>"integration subsystem"</p> <p>Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78</p>	<p>"one or more components of a system or device configured to integrate an external device with a car audio/video system"</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i></p>	<p>Subject to 35 U.S.C. § 112(6) Indefinite.</p> <p>Alternatively, "a microprocessor programmed to perform the method of FIG. 24"</p>	
	<p>"portable"</p> <p>Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78</p>	Plain Meaning	<p>"capable of being moved about"</p> <p>[This is the <i>Ford</i> court's construction.]</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ³	COURT'S CONSTRUCTION
Claim 62. The system of claim 49, wherein the portable device comprises a portable digital media player.	"portable" Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78	Plain Meaning	"capable of being moved about" [This is the <i>Ford</i> court's construction.]	Claim 62. The system of claim 49, wherein the portable device comprises a portable digital media player.
Claim 70. The system of claim 66, wherein said integration subsystem receives video generated by the portable device in a first format incompatible with the car audio/video system , processes the video into processed video in a second format compatible with the car audio/video system , and transmits the processed video to the car audio/video system for subsequent display of the processed video on a	"integration subsystem" Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78	"one or more components of a system or device configured to integrate an external device with a car audio/video system" If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i>	Subject to 35 U.S.C. § 112(6) Indefinite. Alternatively, "a microprocessor programmed to perform the method of FIG. 24"	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
display of the car audio/video system .	<p>“portable”</p> <p>Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78</p>	Plain Meaning	<p>“capable of being moved about”</p> <p>[This is the <i>Ford</i> court's construction.]</p>	
	<p>“format incompatible with the [car stereo, car audio/video system]”</p> <p>Claims 54, 70, 78</p>	Plain Meaning	<p><u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u></p> <p>“a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device”</p> <p><u>Honda's Proposed Construction:</u></p> <p>“format alien to and inoperable with an existing [car stereo, car audio/video system]”</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	
Claim 73. A multimedia device integration system, comprising:		<p>Claim 73 is not indefinite under <i>IPXL Holdings, L.L.C. v. Amazon.com, Inc.</i>, 430 F.3d 1377 (Fed. Cir. 2005), because it does not claim both an apparatus and a method.</p>	<p>Claim 73 is indefinite for claiming both an apparatus and method in the same claim under <i>IPXL Holdings, L.L.C. v. Amazon.com, Inc.</i>, 430 F.3d 1377 (Fed. Cir. 2005).</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	"integration" / "integrating" Claims 49, 73	[AGREED]	[AGREED]	"Connecting one or more external devices or inputs to an existing car stereo or video system via an interface, processing and handling signals, audio, and/or video information, allowing a user to control the devices via the car stereo or video system, and displaying data from the devices on the car stereo or video system."

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
an integration subsystem in communication with a car audio/video system ; and	<p>"integration subsystem"</p> <p>Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78</p>	<p>"one or more components of a system or device configured to integrate an external device with a car audio/video system"</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i></p>	<p>Subject to 35 U.S.C. § 112(6)</p> <p>Indefinite.</p> <p>Alternatively, "a microprocessor programmed to perform the method of FIG. 24"</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
a first wireless interface in communication with said integration subsystem , said first wireless interface establishing a wireless communication link with a second wireless interface in communication with a portable device external to the car audio/video system ,	<p>“integration subsystem”</p> <p>Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78</p>	<p>“one or more components of a system or device configured to integrate an external device with a car audio/video system”</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary “structure(s), act(s), or material(s)” that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i></p>	<p>Subject to 35 U.S.C. § 112(6)</p> <p>Indefinite.</p> <p>Alternatively, “a microprocessor programmed to perform the method of FIG. 24”</p>	
	<p>“portable”</p> <p>Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78</p>	<p>Plain Meaning</p>	<p>“capable of being moved about”</p> <p>[This is the <i>Ford</i> court's construction.]</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE’S CONSTRUCTION	DEFENDANTS’ CONSTRUCTION³	COURT’S CONSTRUCTION
	“external” Claims 49, 73	“a device that is outside and alien to the environment of an OEM or after-market stereo system but for the inclusion of an interface”	“an after-market device that is outside and alien to the environment of an OEM or after-market stereo system” [This is the <i>Ford</i> court’s construction.]	
	“car audio/video system” Claims 49, 53, 54, 56, 70, 73, 77, 78	Plain Meaning	“‘All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms ‘car audio/video systems.’”	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
wherein said integration subsystem obtains, using said wireless communication link, information about an audio file received by the portable device, transmits the information to the car audio/video system for subsequent display of the information on a display of the car audio/video system , instructs the portable device to play the audio file in response to a user selecting the audio file using controls of the car audio/video system , and receives audio generated by the portable device over said wireless communication link for playing on the	<p>"integration subsystem"</p> <p>Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78</p>	<p>"one or more components of a system or device configured to integrate an external device with a car audio/video system"</p> <p>If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i></p>	<p>Subject to 35 U.S.C. § 112(6)</p> <p>Indefinite.</p> <p>Alternatively, "a microprocessor programmed to perform the method of FIG. 24"</p>	
	<p>"portable"</p> <p>Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78</p>	<p>Plain Meaning</p>	<p>"capable of being moved about"</p> <p>[This is the <i>Ford</i> court's construction.]</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
car audio/video system.	“car audio/video system” Claims 49, 53, 54, 56, 70, 73, 77, 78	Plain Meaning	“All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms ‘car audio/video systems.’”	
	“generated . . . for playing on the car audio/video system” Claims 49, 73	“produced by the portable device during playback”	“produced by the portable device during playback as decoded audio signals without further decoding before being output through the car audio/video system”	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
Claim 77. The system of claim 73, wherein said integration subsystem receives a control command issued at the car audio/video system in a format incompatible with the portable device , processes the control command into a formatted command compatible with the portable device, and dispatches the processed control command to the portable device for execution thereby.	"integration subsystem" Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78	"one or more components of a system or device configured to integrate an external device with a car audio/video system" If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i>	Subject to 35 U.S.C. § 112(6) Indefinite. Alternatively, "a microprocessor programmed to perform the method of FIG. 24"	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION ³	COURT'S CONSTRUCTION
	<p>“format incompatible with the [after-market audio device, portable device, MP3 player]”</p> <p>Claims 53, 77</p>	Plain Meaning	<p><u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u></p> <p>“a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device”</p> <p><u>Honda's Proposed Construction:</u></p> <p>“format alien to and inoperable with the [after-market audio device, MP3 player, portable device]”</p>	
	<p>“portable”</p> <p>Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78</p>	Plain Meaning	<p>“capable of being moved about”</p> <p>[This is the <i>Ford</i> court's construction.]</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
Claim 78. The system of claim 73, wherein said integration subsystem receives data generated by the portable device in a format incompatible with the car audio/video system , processes the data into formatted data compatible with the car audio/video system , and transmits the processed data to the car audio/video system for subsequent display of the processed data on a display of the car audio/video system.	"integration subsystem" Claims 49, 53, 54, 56, 57, 66, 70, 73, 77, 78	"one or more components of a system or device configured to integrate an external device with a car audio/video system" If the Court determines that this term is governed by 35 U.S.C. § 112, ¶ 6, Blitzsafe agrees with Defendants' recitation of the function of this term, and identifies the following exemplary "structure(s), act(s), or material(s)" that may correspond to this term: <i>See, e.g., '342 Patent, Figs 3A–D, 4A–G, 10–24; 12:58–16:29; 16:40–24:47; 28:7–38:48.</i>	Subject to 35 U.S.C. § 112(6) Indefinite. Alternatively, "a microprocessor programmed to perform the method of FIG. 24"	
	"portable" Claims 49, 53, 54, 56, 57, 62, 70, 73, 77, 78	Plain Meaning	"capable of being moved about" [This is the <i>Ford</i> court's construction.]	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>“format incompatible with the [car stereo, car audio/video system]”</p> <p>Claims 54, 70, 78</p>	Plain Meaning	<p><u>Hyundai, Kia, Nissan, and Toyota's Proposed Construction:</u></p> <p>“a format that the OEM or factory-installed car stereo was not designed to use when communicating with an aftermarket device”</p> <p><u>Honda's Proposed Construction:</u></p> <p>“format alien to and inoperable with an existing [car stereo, car audio/video system]”</p>	

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ASSERTED CLAIM(S)	DISPUTED TERM	BLITZSAFE'S CONSTRUCTION	DEFENDANTS' CONSTRUCTION³	COURT'S CONSTRUCTION
	<p>"car audio/video system"</p> <p>Claims 49, 53, 54, 56, 70, 73, 77, 78</p>	Plain Meaning	<p>"All presently existing car audio and video systems, such as physical devices that are present at any location within a vehicle, in addition to software and/or graphically-or display-driven receivers. An example of such a receiver is a software-driven receiver that operates on a universal LCD panel within a vehicle and is operable by a user via a graphical user interface displayed on the universal LCD panel. Further, any future receiver, whether a hardwired or a software/graphical receiver operable on one or more displays, is considered within the definition of the terms 'car audio/video systems.'"</p>	