

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

LONGHORN AUTOMOTIVE GROUP LLC,

Plaintiff,

v.

VOLKSWAGEN AG,

Defendant.

Case No. 2:24-cv-00933-JRG
(LEAD CASE)

JURY TRIAL DEMANDED

LONGHORN AUTOMOTIVE GROUP LLC,

Plaintiff,

v.

MAZDA MOTOR CORPORATION,

Defendant.

Case No. 2:24-cv-00686-JRG
(MEMBER CASE)

JURY TRIAL DEMANDED

**PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS
AND INFRINGEMENT CONTENTIONS**

Plaintiff Longhorn Automotive Group LLC ("LAG" or "Plaintiff") hereby makes the following infringement disclosures under the Patent Local Rules with respect to U.S. Patent No. 8,810,803 (the "'803 Patent"), U.S. Patent No. 7,987,002 (the "'002 Patent"), U.S. Patent No. 7,513,238 (the "'238 Patent"), U.S. Patent No. 8,265,353 (the "'353 Patent"), and U.S. Patent No. 8,085,192 (the "'192 Patent") (collectively, the "Asserted Patents"). LAG's investigation is ongoing and discovery is not open. Accordingly, these disclosures are based on information available to LAG at this time. LAG reserves the right to supplement these disclosures after further discovery from Defendants' and non-parties, particularly documents and other discovery regarding

Pursuant to Patent Local Rule 3-6(a)(1), LAG reserves the right to amend its infringement contentions as to literal infringement or infringement under the doctrine of equivalents in light of the Court's claim construction.

D. APPLICATION PRIORITY DATES

Each of the asserted claims of the '803 Patent claim priority to U.S. Application No. 12/269,849, filed on November 12, 2008.

Each of the asserted claims of the '002 Patent claim priority to International Application PCT/SE04/001540, filed on October 25, 2004.

Each of the asserted claims of the '238 Patent claim priority to International Application PCT/EP2004/011637, filed October 15, 2004.

Each of the asserted claims of the '353 Patent are entitled to the priority to the date of its own U.S. Patent Application No. 10/955,037, filed on September 20, 2004.

Each of the asserted claims of the '192 Patent are entitled to the priority to the date of U.S. Patent Application No. 11/220,232, filed on September 6, 2005.

E. PRODUCTS THAT PRACTICE THE ASSERTED PATENTS

LAG is continuing to investigate what products and/or historical products may practice the claimed inventions, including those products of third parties (*e.g.*, previous assignees) of the Asserted Patents. At the present time LAG is not currently aware of any past products that practice its patents. LAG's investigation is ongoing, and LAG will supplement these contentions following its investigation (and claim construction as necessary).

II. PRODUCTION OF DOCUMENTS PURSUANT TO PATENT LOCAL RULE 3-2

LAG is producing or making available for inspection documents that are in LAG's possession, custody, or control as set forth in Patent Local Rule 3-2. An LAG 3-2 Production Index identifying these documents is attached hereto.

This preliminary identification of documents is for convenience and is not an admission that each document falls within any exemplary categories in the Patent Local Rules, or that any document qualifies as prior art. Thus, LAG reserves its right to add to, delete from, or otherwise modify its disclosures in this section as its investigation proceeds.

Production of these documents is governed by Patent Local Rule 2-2 and, with the exception of documents produced pursuant to P.R. 3.2(c) and public documents listed in the infringement charts, are considered "Confidential – Outside Attorneys Eyes Only" and disclosure of the confidential document or information, shall be limited to each parties' outside attorney(s) of record and the employees of such outside attorney(s).

Dated: April 4, 2025

Respectfully submitted,

/s/ Vincent J. Rubino, III

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

John Andrew Rubino