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

AUTOCONNECT HOLDINGS LLC, ***Plaintiff,*** **v.** **TOYOTA MOTOR CORPORATION, ET AL.,** ***Defendants.***	**Case No. 2:24-cv-00802-JRG-RSP** (Lead Case)
AUTOCONNECT HOLDINGS LLC, ***Plaintiff,*** **v.** **GENERAL MOTORS LLC** ***Defendants.***	**Case No. 2:24-cv-00877-JRG-RSP** (Member Case)

DEFENDANTS' PRELIMINARY INVALIDITY CONTENTIONS

Pursuant to Patent Local Rules ("P.R.") 3-3 and 3-4 and the Court's Docket Control Order (Dkt. No. 64), Defendants Toyota Motor Corporation ("TMC"), Toyota Motor North America, Inc. ("TMNA"), Toyota Motor Engineering & Manufacturing North America, Inc. ("TME"), and Toyota Motor Sales, U.S.A, Inc. ("TMS") (collectively, the "Toyota Defendants"); and General Motors LLC ("GM") (collectively with the Toyota Defendants, "Defendants") hereby make the following initial Invalidity Contentions and provide accompanying document production.

		Resource Management for Multicore Aware Software Architectures of In-Car Multimedia Systems	Oct. 4-7, 2011	Knirsch et al.	Pre-AIA 102(a), (b)
		Renault Unveils Fourth-Generation Clio	July 3, 2012	Reneault	Pre-AIA 102(a), (b)

14. U.S. Patent No. 9,147,297

Ex.	Country	Name/Patent/ Application No.	Filing/Publication/ Issue Date	Inventor(s)	35 U.S.C. Section 102
N-5	US	8977408	Sep. 23, 2011 / March 3, 2015 / March 3, 2015	Cazanas et al.	Pre-AIA 102(e)
	DE	102011100941	May 9, 2011 / Nov. 15, 2012 / N/A	Schäfer et al.	Pre-AIA 102(a), (b), (e)
N-4	US	9224289	March 15, 2013 / June 21, 2014 / Dec. 29, 2015	Demeniuk et al.	AIA 102(a)(2)
	DE	102011112680	Sept. 6, 2011 / May 10, 2012 / N/A	Kulendik et al.	Pre-AIA 102(a), (b), (e)
	EP	2163450	June 25, 2008 / Mar. 17, 2010 / Nov. 16, 2016	Agnvall et al.	Pre-AIA 102(a), (b), (e)
	JP	4629066	Apr. 17, 2007 / Sept. 20, 2007 / Feb. 9, 2011	Williams et al.	Pre-AIA 102(a), (b), (e)
	KR	100647374	Jan. 19, 2005 / July 24, 2006 / Nov. 23, 2006	Hyun	Pre-AIA 102(a), (b), (e)
	KR	20090023143	Aug. 22, 2008 / Mar. 4, 2009 / N/A	Hoh et al.	Pre-AIA 102(a), (b), (e)
	US	6981042	Sept. 6, 2000 / N/A / Dec. 27, 2005	Rey	Pre-AIA 102(a), (b), (e)

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	US	7657907	Sept. 30, 2002 / Apr. 15, 2004 / Feb. 2, 2010	Ferman et al.	Pre-AIA 102(a), (b), (e)
	US	7831350	Feb. 24, 2006 / June 29, 2006 / Nov. 9, 2010	Goudy	Pre-AIA 102(a), (b), (e)
	US	8234135	Dec. 8, 2011 / Apr. 5, 2012 / July 31, 2012	Herde et al.	Pre-AIA 102(a), (b), (e)
	US	10250837	Dec. 5, 2012 / June 5, 2014 / Apr. 2, 2019	Newell	Pre-AIA 102 (e)
N-1	US	20070143482	Dec. 20, 2005 / June 21, 2007 / N/A	Zancho	Pre-AIA 102(a), (b), (e)
N-2	US	20070208861	Mar. 2, 2006 / Sept. 6, 2007 / N/A	Zellner et al.	Pre-AIA 102(a), (b), (e)
	US	20090232114	Mar. 14, 2008 / Sept. 17, 2009 / Sept. 17, 2013	Barave et al.	Pre-AIA 102(a), (b), (e)
	US	20100202755	Apr. 15, 2010 / Aug. 12, 2010 / Jan. 28, 2014	Ariya	Pre-AIA 102(a), (b), (e)
	US	20110106375	Dec. 28, 2010 / May 5, 2011 / N/A	Gurusamy Sundaram	Pre-AIA 102(a), (b), (e)
	US	20110275358	May 4, 2010 / Nov. 10, 2011 / July 23, 2013	Faenger	Pre-AIA 102(a), (b), (e)
	US	20120052854	Aug. 26, 2010 / Mar. 1, 2012 / May 6, 2014	DiMeo et al.	Pre-AIA 102(a), (b), (e)
N-3	US	20120303178	May 26, 2011 / Nov. 29, 2012 / N/A	Hendry et al.	Pre-AIA 102(a), (b), (e)
N-6	US	20100222939	Feb. 27, 2009 / Sept. 2, 2010 / Sept. 2, 2014	Namburu et al.	Pre-AIA 102(a), (b), and (e)
	WO	2013034220	July 28, 2012 / Mar. 14, 2013 / N/A	Maihöfer	Pre-AIA 102(a), (b), (e)
		Resource Management for Multicore Aware	Oct. 4-7, 2011	Knirsch et al.	Pre-AIA 102(a), (b)

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J. Regarding the ’297 Patent

The ’297 patent relates to systems and methods for adjusting the configuration of infotainment settings based on the user profiles and access priorities of two users. The ’297 patent is entitled to a priority date no earlier than April 15, 2013.

Although the ’297 patent’s specification describes embodiments primarily in the context of vehicle infotainment systems, the asserted claims are not restricted to vehicles and drivers, but rather to the broader context of an “infotainment system” and a “user.” Independent claims recite a method, non-transitory computer readable medium or system, or system to detect a user profile with “infotainment information” and an associated infotainment system, and then determine to adjust a configuration of an infotainment system based on that “infotainment information” As shown in the references of the Exhibit N charts, user profiles, configuring infotainment systems based on user profiles consistent with these elements was well known to a person of skill in the art. E.g. Zellner ’861 at [0049], [0059]; Morehouse ’141 at Abstract.

The independent claims also recite determination and comparison of access priorities for two users as part of the determination to adjust a configuration of an infotainment system. A person of ordinary skill in the art would also be well aware of methods and systems for this determination, but in and out of the vehicle context as of the invention date of the ’297 patent. Newell ’837 at 19-29 (“the set-top box 22 can compare the priority data of each user profile and then execute operations based on the user that has the highest priority . . . . Alternatively, the set-top box 22 can automatically give control to the higher priority user, and can load the configuration according to that user's profile.”); Cazanas ’408 at 7:33-36 (“if the vehicle 14 has two key fobs 18, key fob A and key fob B, the mastership may be set so that key fob A controls when both key fobs 18 are detected”).

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A person of ordinary skill in the art would have been aware of prior art examples of adjusting media configuration settings based on user profiles and access priority by the priority date of the ’297 patent. Such concepts were well known and commonplace in the field of networks systems and personalized settings, including in connected vehicles. Indeed, it was obvious to a POSITA at the time of the ‘297 patent to implement functionality present in other personal computing devices in a vehicle’s computing environment, which effectively became another personal computing device. For example, as multi-user computing environments became commonplace, it was obvious to customize a user environment to the current user of the system. For example, when a user logs into a laptop, the Windows environment confirms to the user’s preferences based on the user priorities. An administrative user has access to greater functionality than a normal user. Similarly, parental controls for streaming of audio and video work in a similar manner, granting greater access and control to certain users than others.

A person of skill in the art would further have viewed the features recited in the dependent claims in the ’297 patent as known and conventional, or example, partial proximity-based detection. E.g. Rey ’042, 1:63-65. Online access while obtaining additional information (although the claim does not require that the online source provide that information) was also well known from various cloud services. E.g. Zellner ’861 at [0091] (“Still other configurations can provide priority settings between the user device 106 and the remote network 210 (universally for the environment, for each setting, for each type of setting, for particular users, etc.)”.)

To the extent that any on the charted reference in Exhibit N does not explicitly each and every element in the same configuration as the claims of the ’297 patent, a POSITA would understand that various embodiments consistent with the claims of the ’297 patent would be

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obvious, relying on the POSITA's own background knowledge of the state of the art and experience to understand each reference teachings to disclose every claim limitation. Additionally, a person of skill in the art would be motivated to combine the charted references with one or more of the other charted references and prior art listed above as reference and system prior art with respect to the '297 and have a reasonable expectation of success. For example, a person of skill in the art would look to the following exemplary combinations of references:

- Zancho '482 in view of one or more of Zellner '861, Hendry '178, Demeniuk '289, Cazanas '408, Namburu '939, and Newell '837.
- Zellner '861 in view of one or more of Zancho '482, Hendry '178, Demeniuk '289, Cazanas '408, and Newell '837.
- Hendry '178 in view of one or more of Zancho '482, Zellner '861, Demeniuk '289, Cazanas '408, and Newell '837.
- Namburu '939 in view of one or more of Zancho '482, Zellner '861, Hendry '178, Demeniuk '289, Cazanas '408, and Newell '837.

For example, a person of skill in the art would seek to combine the Zellner, and Hendry, Cazanas, and Namburu references with a reasonable expectation of success because each of them disambiguates user profiles and assigns priority based on a key fob identification system for the purpose of customizing configuration settings. A person of ordinary skill in the art would further be motivated to combine one or more of Zellner, Hendry, and Cazanas with Demeniuk, Namburu, or Newell with a reasonable expectation of success because each of Demeniuk and Newell discloses a more capable object, such as a phone, as a device that identifies a user to the

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vehicle. Although Newell does not explicitly disclose vehicles, Zancho's teachings to carry infotainment information from one domain, such as home, to another, such as a vehicle, would motivate a person of ordinary skill in the art to combine its Newell, which discloses television receivers as configurable based on infotainment information in user profile lookup-based manner as the other references, with one or more of each of the other references that do disclose a vehicle.

It would further been obvious to combine any system identified in Section II.C.14 with any of the references charted in Exhibits N.

K. Regarding the '100 Patent

The '100 patent relates to systems and methods for network security in a vehicle. The '100 patent is entitled to a priority date no earlier than March 14, 2013.

The claims of the '100 patent are generally directed to detecting an instance of a security breach in a vehicle perimeter network and isolating an affected component. By March 2013, the concepts of vehicle security systems reflected in the claims of the '100 patent were already well-known and commonplace in the automotive industry and in the field of network security more generally. As demonstrated in the prior art cited below, in the Exhibit O claim charts, and in other references demonstrating the state of the art and knowledge of a person of ordinary skill, these concepts were already known and established in field.

To the extent that AutoConnect argues that any of the references cited in the Exhibit O claim charts does not disclose one or more elements of the claims the '100 patent, it would have been obvious to a person of ordinary skill in the art to combine the teachings of that reference with their own background knowledge and/or the prior art, including the references cited below or in the Exhibit O claim charts. Exemplary combinations of references include:

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