



2. Chrysler, on information and belief, is a limited liability company organized and existing under the laws of the State of Delaware. Chrysler is doing business in Wisconsin, and, on information and belief, has a principal place of business at 1000 Chrysler Dr., Auburn Hills, MI 48326-2766. Chrysler may be served with process by serving its Wisconsin registered agent, the CT Corporation System, 8025 Excelsior Dr., Ste. 200, Madison, WI 53717-2902.
3. Ford, on information and belief, is a corporation organized and existing under the laws of the State of Delaware. Ford is doing business in Wisconsin, and, on information and belief, has a principal place of business at 1 American Road, Dearborn, Michigan 48126-2768. Ford may be served with process by serving its Wisconsin registered agent, the CT Corporation System, 8025 Excelsior Dr Ste 200, Madison, WI 53717-2902.
4. Honda, on information and belief, is a corporation organized and existing under the laws of the State of California. Honda is doing business in Wisconsin, and, on information and belief, has a principal place of business at 1919 Torrance Blvd., Torrance, CA 90501-2746. Honda may be served with process by serving its Wisconsin registered agent, the CT Corporation System, 8025 Excelsior Dr Ste 200, Madison, WI 53717-29.
5. Mazda, on information and belief, is a corporation organized and existing under the laws of the State of California. Mazda is doing business in Wisconsin, and, on information and belief, has a principal place of business at 7755 Irvine Center Dr., Irvine, CA 92623. Mazda may be served with process by serving its Wisconsin registered agent, the CT Corporation System, 8025 Excelsior Dr Ste 200, 8025 Excelsior Dr Ste 200, Madison, WI 53717-2902.
6. GM, on information and belief, is a corporation organized and existing under the laws of the State of Delaware. GM is doing business in Wisconsin, and, on information and belief, has a principal place of business at 300 Renaissance Center, Detroit, MI 48265-3000. GM may be

served with process by serving its Wisconsin registered agent, the CT Corporation System, 8025 Excelsior Dr Ste 200, Madison, WI 53717-2902.

7. Volkswagen, on information and belief, is a corporation organized and existing under the laws of the State of New Jersey. Volkswagen is doing business in Wisconsin, and on information and belief, has a principal place of business at 600 Sylvan Ave, Englewood, NJ 04631. Volkswagen may be served with process by serving its New Jersey registered agent The Corporation Trust Company, 802 Bear Tavern Road, West Trenton, NJ 04631.
8. BMW, on information and belief, is a corporation organized and existing under the laws of the State of Delaware. BMW is doing business in Wisconsin, and on information and belief, has a principal place of business at 300 Chestnut Ridge Road, Woodcliff Lake, New Jersey 07767. BMW may be served with process by serving its Wisconsin registered agent, the CT Corporation System, 8025 Excelsior Dr Ste 200, Madison, WI 53717-2902.
9. Mercedes, on information and belief, is a corporation organized and existing under the laws of the State of Delaware. Mercedes is doing business in Wisconsin, and on information and belief, has a principal place of business at One Mercedes Drive, Montvale, New Jersey, 07645. Mercedes may be served with process by serving its Wisconsin registered agent, the CT Corporation System, 8025 Excelsior Dr Ste 200, Madison, WI 53717-2902.
10. Suzuki, on information and belief, is a corporation organized and existing under the laws of the State of California. Suzuki is doing business in Wisconsin, and on information and belief, has a principal place of business at 3251 E Imperial Hwy, Brea, CA, 92821-6722. Suzuki may be served with process by serving its California registered agent, Cathi Black, 3251 E Imperial Hwy, Brea, CA, 92821-6722.

11. ADI, on information and belief, is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, having its principal place of business at One Technology Way, Norwood, Massachusetts 02062. ADI has moved to be joined to this case and may be served with process by serving its attorneys of record.
12. Freescale, on information and belief, is a corporation organized and existing under the laws of the State of Delaware, having its principal place of business at 6501 William Cannon Drive West, Austin, TX, 78735. Freescale has moved to be joined to this case and may be served with process by serving its attorneys of record.

#### **JURISDICTION & VENUE**

13. This is an action for infringement of a United States patent. Accordingly, this action arises under the patent laws of the United States of America, 35 U.S.C. § 1 et. seq. and jurisdiction is properly based on Title 35 United States Code, particularly § 271, and title 28 United States Code, particularly § 1338(a).
14. Venue is proper in this court under Title 28 United States Code § 1391(b) and 1400(b).

#### **PATENT INFRINGEMENT COUNT**

15. On January 28, 2003, United States Patent No. 6,512,364 (“the ‘364 patent”) entitled “Testing Sensor” was duly and legally issued. A true and correct copy of the ‘364 patent is attached as Exhibit A. The ‘364 patent is directed to a method for testing a sensor with a particular testing feature.
16. Pursuant to 35 U.S.C. § 282, the above-listed United States Patent is presumed valid.
17. Kazuhiro Okada is the inventor of the ‘364 patent.
18. On July 16, 2008, Kazuhiro Okada assigned his entire interest in the ‘364 patent to Wacoh, which is now the sole owner of the ‘364 patent.

19. Chrysler infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by Chrysler each time an infringing Chrysler vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing Chrysler vehicles include the 2005 Chrysler Pacifica, the 2005 Chrysler Town and Country, the 2005 Dodge Durango, the 2005 300 LX, the 300 C SRT8, the 2005 Caravan, the 2005 Crossfire, the 2005 Crossfire SRT6, the 2005 Dakota, the 2005 Grand Cherokee, the 2005 Jeep, the 2005 Liberty, the 2005 Magnum LX, the 2005 Neon, the 2005 Neon SRT4, the 2005 PT Cruiser Convertible, the 2005 Ram Truck, the 2005 Ram Truck Power Wagon, the 2005 Ram Truck SRT10, the 2005 Sebring Convertible, the 2005 Sebring Coupe, the 2005 Sebring Sedan, the 2005 Stratus Coupe, the 2005 Sprinter, the 2005 Stratus Sedan, the 2005 Viper, the 2005 Viper SRT10, the 2005 Wrangler, the 2003 Jeep Liberty vehicles, the 2003 300, the 2003 Caravan, the 2003 Dakota, the 2003 Dodge Sprinter, the 2003 Durango, the 2003 Grand Cherokee, the 2003 Intrepid, the 2003 Liberty, the 2003 Neon, the 2003 Neon SRT4, the 2003 PT Crusier, the 2003 Ram Truck, the 2003, Ram Van/Wagon, the 2003 Sebring Convertible, the 2003 Sebring Coupe, the 2003 Sebring Sedan, the 2003 Stratus Coupe, the 2003 Stratus Sedan, the 2003 Town and Country, the 2003 Viper, the 2003 Voyager, the 2003 Wrangler, the 2004 300, the 2004 Caravan, the 2004 Concorde, the 2004 Crossfire, the 2004 Dakota, the 2004 Durango, the 2004 Grand Cherokee, the 2004 Intrepid, the 2004 Liberty, the 2004 Neon, the 2004 neon SRT4, the 2004 Pacifica, the 2004 PT Cruiser, the 2004 Ram Truck, the 2004 Sebring Convertible, the 2004 Sebring Coupe, the 2004 Sebring Sedan, the 2004 Sprinter, the 2004 Stratus Coupe, the 2004

Stratus Sedan, the 2004 Town and country, the 2004 Viper, the 2004 Voyager, the 2004 Wrangler, The 2006 300, the 2006 300 C SRT8, the 2006 Caravan, the 2006 Charger LX, the 2006 Charger SRT8, the 2006 Commander, the 2006 Dakota, the 2006 Durango, the 2006 Grand Cherokee, the 2006 Grand Cherokee SRT8, the 2006 Liberty, the 2006 Magnum LX, the 2006 Magnum SRT8, the 2006 Cruiser, the 2006 Ram Truck, the 2006 Ram Truck Power Wagon, the 2006 Ram Truck SRT10, the 2006 Sebring Convertible, the 2006 Sebring Sedan, the 2006 Sprinter, The 2006 Stratus, the 2006 Town and Country, the 2006 Viper SRT10, the 2006 Wrangler, the 2007 300, the 2007 SRT8, the 2007 Aspen, the 2007 Caliber, the 2007 Caravan, the 2007 Charger LX, the 2007 Charger SRT8, the 2007 Commander, the 2007 Compass, the 2007 Crossfire, the 2007 Dakota, the 2007 Durango, the 2007 Grand Cherokee, the 2007 Grand Cherokee SRT8, the 2007 Liberty, the 2007 Magnum, the 2007 Magnum SRT8, the 2007 Nitro, the 2007 Pacifica, the 2007 Patriot, the 2007 PT Cruiser, the 2007 Ram Truck, the 2007 Ram Truck Power Wagon, the 2007 Sebring, the 2007 Sprinter, the 2007 Town and Country, the 2007 Wrangler, the 2008 300, the 2008 300 SRT8, the 2008 Aspen, the 2008 Avenger, the 2008 Caliber, the 2008 Caravan, the Challenger, the 2008 Charger/Magnum LX, the 2008 Commander, the 2008 Compass, the 2008 Dakota, the 2008 Durango, the 2008 Grand Cherokee, the 2008 Grand Cherokee SRT8, the 2008 Liberty, the 2008 Magnum LX, the 2008 Nitro, the 2008 Pacifica, the 2008 Patriot, the 2008 PT Cruiser, the 2008 Ram Truck, the 2008 Ram Truck Power Wagon, the 2008 Sebring, the 2008 Sprinter, the 2008 Town and Country, the 2008 Viper SRT10, the 2008 Wrangler, and the 2009 300, the 2009 300 SRT8, the 2009 Aspen, the 2009 Avenger, the 2009 Caliber, the 2009 Caliber SRT4, the 2009 Caravan, the 2009 Challenger, the 2009 Challenger SRT8, the Charger LX, the 2009 Charger SRT8, the 2009 Commander, the 2009 Compass, the 2009

Dakota, the 2009 Durango, the 2009 Grand Cherokee, the 2009 Grand Cherokee SRT8, the 2009 Journey, the 2009 Liberty, the 2009 Nitro, the 2009 Patriot, the 2009 PT Cruiser, the 2009 Ram Chassis/Cab, the 2009 Ram Truck, the 2009 Sebring, the 2009 Sebring Convertible, the 2009 Town and Country, the 2009 Viper Coupe/Convertible, and the 2009 Wrangler as well as any other Chrysler vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.

20. Ford infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by Ford each time an infringing Ford vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing Ford vehicles include the 2003 Ford Excursion, the 2005 Ford Mustang, the 2006 Ford Mustang, the 2003 Ford Escape, the 2004 Ford Expedition, the 2003 Ford Crown Victoria vehicles, the 2003 Ford Econoline Cargo Van, the 2003 Ford Econoline Wagon, the 2003 Ford Escape, the 2003 Ford Excursion, the 2003 Ford Expedition, the 2003 Ford Explorer, the 2003 Ford Explorer Sport, the 2003 Ford Explorer Sport Trac, the 2003 Ford F-150, the 2003 Ford Focus, the 2003 Ford Mustang, the 2003 Ford Ranger, the 2003 Ford Super Duty F-250, the 2003 Ford Super Duty F-350 DRW, the 2003 Ford Super Duty F-350 SRW, the 2003 Ford Taurus, the 2003 Ford Thunderbird, the 2003 Ford Windstar Cargo Van, the 2003 Windstar Wagon, the 2003 Ford ZX2, the 2004 Ford Crown Victoria, the 2004 Ford Econoline Cargo Van, the 2004 Econoline Wagon, the 2004 Ford Escape, the 2004 Ford Excursion, the 2004 Ford Expedition, the 2004 Ford Explorer, the 2004 Ford Explorer Sport Trac, the 2004 Ford F-150, the 2004 Ford F-150 Heritage, the 2004 Ford

Focus, the 2004 Ford Freestar Cargo Van, the 2004 Freestar Wagon, the 2004 Ford Mustang, the 2004 Ford Ranger, the 2004 Ford Super Duty F-250, the 2004 Ford Super Duty F-350 DRW, the Ford Super Duty F-350 SRW, the 2004 Ford Taurus, the 2004 Ford Thunderbird, the 2005 Ford Crown Victoria, the 2005 Ford Econoline Cargo Van, the 2005 Econoline Wagon, the 2005 Ford Escape, the 2005 Ford Excursion, the 2005 Ford Expedition, the 2005 Ford Explorer, the 2005 Ford Explorer Trac, the 2005 Ford F-150, the 2005 Ford F-350, the 2005 Ford Five Hundred, the 2005 Ford Focus, the 2005 Ford Freestar Cargo Van, the 2005 Ford Freestar Wagon, the 2005 Ford Freestyle, the 2005 Ford Fusion, the 2005 Ford GT, the 2005 Ford Mustang, the 2005 Ford Ranger, the 2005 Super Duty, the 2005 Ford Super Duty F-250, The 2005 Ford Super Duty F-350 DRW, the 2005 Ford Super Duty F-350 SRW, the 2005 Ford Taurus, the 2005 Ford thunderbird, the 2006 Ford Crown Victoria, the 2006 Ford Econoline Cargo Van, the 2006 Ford Escape, the 2006 Ford Expedition, the 2006 Ford Explorer, the 2006 Ford F-150, the 2006 Ford Five Hundred, the 2006 Ford Focus, the Ford Freestar Cargo Van, the 2006 Ford Freestar Wagon, the 2006 Ford Freestyle, the 2006 Ford Fusion, the 2006 Ford GT, the 2006 Ford Mustang, the 2006 Ford Ranger, the 2006 Ford Super Duty F-250, the 2006 Ford Super Duty F-350 DRW, the 2006 Ford Super Duty F-350 SRW, the 2006 Ford Taurus, the 2007 Ford Crown Victoria, the 2007 Ford Econoline Cargo Van, the 2007 Ford Econoline Wagon, the 2007 Ford Edge, the 2007 Ford Escape, the 2007 Ford Expedition, the 2007 Ford Expedition EL, the 2007 Ford Explorer, the 2007 Ford Explorer Sport Trac, the 2007 Ford F-150, the 2007 Ford Five Hundred, the 2007 Ford Focus, the 2007 Ford Freestar Cargo Van, the 2007 Ford Freestar Wagon, the 2007 Ford Freestyle, the 2007 Ford Fusion, the 2007 Ford GT, the 2007 Ford Mustang, the 2007 Ford Ranger, the 2007 Ford Super Duty F-250, the 2007 Ford Super Duty F-350 DRW, and the



2007 Ford Super Duty F-350 SRW, the 2008 Ford Econoline Cargo Van, the 2008 Ford Econoline Wagon, the 2008 Ford Edge, the 2008 Ford Escape, the 2008 Ford Expedition, the 2008 Ford Expedition EL, the 2008 Ford Explorer, the 2008 Ford Explorer Sport Trac, the 2008 Ford F-150, the 2008 Ford Focus, the 2008 Ford Fusion, the 2008 Ford Mustang, the 2008 Ford Ranger, the 2008 Ford Super Duty F-250, the 2008 Ford Super Duty F-350 DRW, the 2008 Ford Super Duty F-350 SRW, the 2008 Ford Super Duty F-450, the 2008 Ford Taurus, the 2008 Ford Taurus X, the 2009 Ford Econoline Cargo Van, the 2009 Ford Econoline Wagon, the 2009 Ford Edge, the 2009 Ford Escape, the 2009 Ford Expedition, the 2009 Ford Expedition EL, the 2009 Ford Explorer, the 2009 Ford Explorer Sport Trac, the 2009 Ford F-150, the 2009 Ford Flex, the 2009 Ford Focus, the 2009 Ford Fusion, the 2009 Ford Mustang, the 2009 Ford Ranger, the 2009 Ford Super Duty F-250, the 2009 Ford Super Duty F-350 DRW, the 2009 Ford Super Duty F-350 SRW, the 2009 Ford Super Duty F-450, the 2009 Ford Taurus, the 2009 Ford Taurus X, the 2003 Lincoln Aviator, the 2003 Lincoln Blackwood, the 2003 Lincoln LS, the 2003 Lincoln Navigator, the 2003 Lincoln Town Car, the 2004 Lincoln Aviator, the 2004 Lincoln LS, the 2004 Lincoln Mark LT, the 2004 Lincoln Navigator, the 2004 Lincoln Town Car, the 2005 Lincoln Aviator, the 2005 Lincoln LS, the 2005 Lincoln Mark LT, the 2005 Lincoln Navigator, the 2005 Lincoln Town Car, the 2006 Lincoln Aviator, the 2006 Lincoln LS, the 2006 Lincoln Mark LT, the 2006 Lincoln Navigator, the 2006 Lincoln Town Car, the 2006 Lincoln Zephyr, the 2007 Lincoln Mark LT, the 2007 Lincoln MKX, the 2007 Lincoln MKZ, the 2007 Lincoln Navigator, the 2007 Lincoln Navigator L, the 2007 Lincoln Town Car, the 2008 Lincoln Mark LT, the 2008 Lincoln MKZ, the 2008 Lincoln Navigator, the 2008 Lincoln Navigator L, the 2008 Lincoln Town Car, the 2009 Lincoln MKS, the 2009 Lincoln MKT, the 2009 Lincoln MKX, the 2009

Lincoln MKZ, the 2009 Lincoln Navigator, the 2009 Lincoln Navigator L, the 2009 Lincoln Town Car, the 2003 Mercury Grand marquis, the 2003 Mercury Marauder, the 2003 Mercury Mountaineer, the 2003 Mercury Sable, the 2004 Mercury Grand Marquis, the 2004 Mercury Marauder, the 2004 Mercury Monterey, the 2004 Mercury Mountaineer, the 2004 Mercury Sable, the 2005 Mercury Grand Marquis, the 2005 Mercury Mariner, the 2005 Mercury Montego, the 2005 Mercury Monterey, the 2005 Mercury Mountaineer, the 2005 Mercury Sable, the 2006 Mercury Grand Marquis, the 2006 Mercury Mariner, the 2006 Mercury Milan, the 2006 Mercury Monego, the 2006 Mercury Monterey, the 2006 Mercury Mountaineer, the 2007 Mercury Grand Marquis, the 2007 Mercury Mariner, the 2007 Mercury Milan, the 2007 Mercury Montego, the 2007 Mercury Monterey, the 2007 Mercury Mountaineer, the 2008 Mercury Grand Marquis, the 2008 Mercury Mariner, the 2008 Mercury Milan, the 2008 Mercury Mountaineer, the 2008 Mercury Sable, the 2009 Mercury Grand Marquis, the 2009 Mercury Mariner, the 2009 Mercury Milan, the 2009 Mercury Mountaineer, the 2009 Mercury Sable, the 2003 Volvo C70, the 2003 Volvo S40, the 2003 Volvo S60, the 2003 Volvo S80, the 2003 Volvo V40, the 2003 Volvo V70, the 2003 Volvo XC90, the 2004 Volvo C70, the 2004 Volvo S40, the 2004 Volvo S60, the 2004 Volvo S80, the 2004 Volvo V40, the 2004 Volvo V70, the 2004 Volvo XC90, the 2005 Volvo C70, the 2005 Volvo S40, the 2005 Volvo S60, the 2005 Volvo S80, the 2005 Volvo V50, the 2005 Volvo V70, the 2005 Volvo SC70, the 2005 Volvo SC90, the 2006 Volvo C70, the 2006 Volvo S40, the 2006 Volvo S60, the 2006 Volvo S80, the 2006 Volvo V50, the 2006 Volvo V70, the 2006 Volvo XC70, the 2006 Volvo SC90, the 2007 Volvo C70, the 2007 Volvo S40, the 2007 Volvo S60, the 2007 Volvo S80, the 2007 Volvo V50, the 2007 Volvo V70, the 2007 Volvo XC70, the 2007 Volvo XC90, the 2008 Volvo C30, the 2008 Volvo C70, the

2008 Volvo S40, the 2008 Volvo S60, the 2008 Volvo S80, the 2008 Volvo V50, the 2008 Volvo V70, the 2008 Volvo XC70, the 2008 Volvo XC90, the 2009 Volvo C30, the 2009 Volvo C70, the 2009 Volvo S40, the 2009 Volvo S60, the 2009 Volvo S80, the 2009 Volvo V50, the 2009 Volvo V70, the 2009 Volvo XC60, the 2009 Volvo XC70, and the 2009 Volvo XC90, as well as any other Ford vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.

21. Honda infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by Honda each time an infringing Honda vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing Honda vehicles include the 2003 Honda Accord, the 2003 Accord Coupe, the 2003 Accord Sedan, the 2003 Civic Coupe, the 2003 Civic Hybrid, the 2003 Civic Sedan, the 2003 Civic Si coupe, the 2003 CR-V, the 2003 Element, the 2003 Insight, the 2003 Odyssey, the 2003 Pilot, and the 2003 S2000, the 2004 Accord Coupe, the 2004 Accord Sedan, the 2004 Civic Coupe, the 2004 Civic Hybrid, the 2004 Civic Sedan, the 2004 Civic Si Coupe, the 2004 CR-V, the 2004 Element, the 2004 Insight, the 2004 Odyssey, the 2004 Pilot, and the 2004 S200, the 2005 Accord Coupe, the 2005 Accord Hybrid, the 2005 Accord Sedan, the 2005 Civic Coupe, the 2005 Civic GX, the 2005 Civic Hybrid, the 2005 Civic Sedan, the 2005 Civic Si Coupe, the 2005 CR-V, the 2005 Element, the 2005 Insight, the 2005 Odyssey, the 2005 Pilot, the 2005 S2000, the 2006 Accord Coupe, the 2006 Accord Hybrid, the 2006 Accord Sedan, the 2006 Civic Coupe, the 2006 Civic GX, the 2006 Civic Hybrid, the 2006 Civic Sedan, the 2006 Civic Si Coupe, the 2006 CR-V, the 2006 Element,

the 2006 Insight, the 2006 Odyssey, the 2006 Pilot, the 2006 Ridgeline, and the 2006 S2000, the 2007 Accord Coupe, the 2007 Accord Hybrid, the 2007 Accord Sedan, the 2007 Civic Coupe, the 2007 Civic GX, the 2007 Civic Hybrid, the 2007 Civic Sedan, the 2007 Civic SI Coupe, the 2007 Civic Si Sedan, the 2007 CR-V, the 2007 Element, the 2007 Element SC, the 2007 Fit, the 2007 Odyssey, the 2007 Pilot, the 2007 Ridgeline, and the 2007 S2000, the 2008 Accord Coupe, the 2008 Accord Sedan, the 2008 Civic Coupe, the 2008 Civic GX, the 2008 Civic Hybrid, the 2008 Civic Sedan, the 2008 Civic Si Coupe, the 2008 Civic Si Sedan, the 2008 CR-V, the 2008 Element, the 2008 Element SC, the 2008 Fit, the 2008 Odyssey, the 2008 Pilot, the 2008 Ridgeline, and the 2008 S2000., the 2009 Accord Coupe, the 2009 Accord Sedan, the 2009 Civic Coupe, the 2009 Civic GX, the 2009 Civic Hybrid, the 2009 Civic Sedan, the 2009 Civic Si Coupe, the 2009 Civic Si Sedan, the 2009 CR-V, the 2009 Element, the 2009 Element SC, the 2009 Fit, the 2009 Odyssey, the 2009 Pilot, the 2009 Ridgeline, the 2009 S2000, the 2003 Acura CL, the 2003 Acura MDX, the 2003 Acura NSX, the 2003 Acura RL, the 2003 Acura RSX , the 2003 Acura TL, the 2004 Acura MDX, the 2004 Acura NSX, the 2004 Acura RL, the 2004 Acura RSX, the 2004 Acura TL, the 2004 Acura TSX, the 2005 Acura MDX, the 2005 Acura NSX, the 2005 Acura RL, the 2005 Acura RSX, the 2005 Acura TL, the 2005 Acura TSX, the 2006 Acura MDX, the 2006 Acura RL, the 2006 Acura RSX, the 2006 Acura TL, the 2006 Acura TSX, the 2007 Acura MDX, the 2007 Acura RDX, the 2007 Acura RL, the 2007 Acura TL, and the 2007 Acura TSX, the 2008 Acura MDX, the 2008 Acura RDX, the 2008 Acura RL, the 2008 Acura TL, and the 2008 Acura TSX. The 2009 Acura MDX, the 2009 Acura RDX, the 2009 Acura RL, the 2009 Acura TL, and the 2009 Acura TSX, as well as any other Honda vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these

exemplary vehicles, excluding those Honda vehicles that use systems licensed to perform the method.

22. Mazda infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by Mazda each time an infringing Mazda vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing Mazda vehicles include the 2003 Mazda MPV Van vehicle, the 2003 Mazda 3, the 2003 Mazda Speed Protege, the 2003 Protege5, the 2003 Mazda 6, the 2003 MX-5 Miata, the 2003 RX-8, the 2003 Mazda Tribute, the 2003 B-Series Truck, the 2004 Mazda 3, the 2004 Mazda 6, the 2004 Mazda MPV, the 2004 MX-5 Miata, the 2004 RX-8, the 2004 Tribute, the 2004 B-Series Truck, the 2005 Mazda 3, the 2005 Mazda 6, the 2005 Mazda MPV, the 2005 MX-5 Miata, the 2005 RX-8, the 2005 Tribute, and the 2005 B-Series Truck, the 2006 Mazda 3, the 2006 Mazda 5, the 2006 Mazda 6, the 2006 Mazda MPV, the 2006 MX-5 Miata, the 2006 RX-8, the 2006 Tribute, the 2006 B-Series Truck, the 2007 CX-7, the 2007 CX-9, the 2007 Mazda 3, the 2007 Mazda 5, the 2007 Mazda 6, the 2007 MX-5 Miata, the 2007 RX-8, the 2007 B-Series Truck, the 2008 CX-7, the 2008 CX-9, the 2008 Mazda 3, the 2008 Mazda 5, the 2008 Mazda 6, the 2008 MX-5 Miata, the 2008 RX-8, the 2008 Tribute, the 2008 B-Series Truck, the 2009 CX-7, the 2009 CX-9, the 2009 Mazda 3, the 2009 Mazda 5, the 2009 Mazda 6, the 2009 MX-5 Miata, the 2009 RX-8, the 2009 Tribute, and the 2009 B-Series Truck, as well as any other Mazda vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.

23. GM infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by GM each time an infringing GM vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing GM vehicles include the 2003 Buick Century, the 2003 Buick LeSabre, the 2003 Buick Park Avenue, the 2003 Buick Regal, the 2003 Buick Rendezvous, the 2004 Buick Century, the 2004 Buick LeSabre, the 2004 Buick Park Avenue, the 2004 Buick Rainier, the 2004 Buick Regal, the 2004 Buick Rendezvous, the 2005 Buick Century, the 2005 Buick LaCrosse, the 2005 Buick LaSabre, the 2005 Buick Park Avenue, the 2005 Buick Rainier, the 2005 Buick Rendezvous, the 2005 Buick Terraza, the 2006 Buick LaCrosse, the 2006 Buick Lucerne, the 2006 Buick Rainier, the 2006 Buick Rendezvous, the 2006 Buick Terraza, the 2007 Buick LaCrosse, the 2007 Buick Lucerne, the 2007 Buick Rendezvous, the 2007 Buick Terraza, the 2008 Buick Enclave, the 2008 Buick LaCrosse, the 2008 Buick Lucerne, the 2009 Buick Enclave, the 2009 Buick LaCrosse, the 2009 Buick Lucerne, the 2003 Cadillac CTS, the 2003 Cadillac DeVille, the 2003 Escalade, the 2003 Escalade ESV, the 2003 Escalade EXT, the 2003 Cadillac Seville, the 2004 Cadillac CTS, the 2004 Cadillac CTS-V, the 2004 Cadillac DeVille, the 2004 Cadillac Escalade, the 2004 Cadillac Escalade ESV, the 2004 Cadillac Seville, the 2004 Cadillac SRX, the 2004 Cadillac XLR, the 2005 Cadillac CTS, the 2005 Cadillac CTS-V, the 2005 Cadillac DeVille, the 2005 Cadillac Escalade, the 2005 Cadillac Escalade ESV, the 2005 Cadillac Escalade EXT, the 2005 Cadillac SRX, the 2005 Cadillac STS, the 2005 Cadillac XLR, the 2006 Cadillac CTS, the 2006 Cadillac CTS-V, the 2006 Cadillac DTS, the 2006 Cadillac Escalade, the 2006

Cadillac Escalade ESV, the 2006 Cadillac Escalade EXT, the 2006 Cadillac SRX, the 2006 Cadillac STS, the 2006 Cadillac STS-V, the 2006 Cadillac XLR, the 2006 Cadillac XLR-V, the 2007 Cadillac CTS, the 2007 Cadillac CTS-V, the 2007 Cadillac DTS, the 2007 Cadillac Escalade, the 2007 Cadillac Escalade ESV, the 2007 Cadillac Escalade EXT, the 2007 Cadillac SRX, the 2007 Cadillac STS, the 2007 Cadillac STS-V, the 2007 Cadillac XLR, the 2007 Cadillac XLR-V, the 2008 Cadillac CTS, the 2008 Cadillac DTS, the 2008 Cadillac Escalade, the 2008 Cadillac Escalade ESV, the 2008 Cadillac Escalade EXT, the 2008 Cadillac SRX, the 2008 Cadillac STS, the 2008 Cadillac STS-V, the 2008 Cadillac XLR, the 2008 XLR-V, the 2009 Cadillac CTS, the 2009 Cadillac CTS-V, the 2009 Cadillac DTS, the 2009 Cadillac Escalade, the 2009 Cadillac Escalade ESV, the 2009 Cadillac Escalade EXT, the 2009 Cadillac Escalade Hybrid, the 2009 Cadillac SRX, the 2009 Cadillac STS, the 2009 Cadillac STS-V, the 2009 Cadillac XLR, the 2009 Cadillac XLR-V, the 2003 Chevrolet Astro (all grades), the 2003 Chevrolet Avalanche, the 2003 Chevrolet Blazer, the 2003 Chevrolet Camaro, the 2003 Chevrolet Cavalier, the 2003 Chevrolet Corvette, the 2003 Chevrolet Express (all grades), the 2003 Chevrolet Impala, the 2003 Chevrolet Malibu, the 2003 Chevrolet Monte Carlo, the 2003 Chevrolet S-10, the 2003 Chevrolet Silverado (all grades), the 2003 Chevrolet SSR, the 2003 Chevrolet Suburban, the 2003 Chevrolet Tahoe, the 2003 Chevrolet Tracker, the 2003 Chevrolet TrailBlazer, the 2003 Chevrolet Venture (all grades), the 2004 Chevrolet Astro (all grades), the 2004 Chevrolet Avalanche, the 2004 Chevrolet Aveo, the 2004 Chevrolet Blazer, the 2004 Chevrolet Corvette, the 2004 Chevrolet Cavalier, the 2004 Chevrolet Colorado, the 2004 Chevrolet Express (all grades), the 2004 Chevrolet Impala, the 2004 Chevrolet Malibu, the 2004 Malibu Maxx, the 2004 Chevrolet Monte Carlo, the 2004 Chevrolet S-10, the 2004 Chevrolet Silverado (all grades), the 2004

Chevrolet SSR, the 2004 Chevrolet Suburban, the 2004 Chevrolet Tahoe, the 2004 Chevrolet Tracker, the 200 Chevrolet TrailBlazer, the 2004 Chevrolet Venture (all grades), the 2005 Chevrolet Astro (all grades), the 2005 Chevrolet Avalanche, the 2005 Chevrolet Aveo, the 2005 Chevrolet Blazer, the 2005 Chevrolet Cavalier, the 2005 Chevrolet Cobalt, the 2005 Chevrolet Colorado, the 2005 Chevrolet Corvette, the 2005 Chevrolet Equinox, the 2005 Chevrolet Express (all grades), the 2005 Chevrolet Impala, the 2005 Chevrolet Malibu, the 2005 Chevrolet Malibu Maxx, the 2005 Chevrolet Monte Carlo, the 2005 Chevrolet Silverado (all grades), the 2005 Chevrolet SSR, the 2005 Chevrolet Suburban, the 2005 Chevrolet Tahoe, the 2005 Chevrolet TrailBlazer, the 2005 Chevrolet Uplander (all grades), the 2005 Chevrolet Venture (all grades), the 2006 Chevrolet Avalanche, the 2006 Chevrolet Aveo, the 2006 Chevrolet Cobalt, the 2006 Chevrolet Colorado, the 2006 Chevrolet Corvette, the 2006 Chevrolet Equinox, the 2006 Chevrolet Express (all grades), the 2006 Chevrolet HHR, the 2006 Chevrolet Impala, the 2006 Chevrolet Malibu, the 2006 Chevrolet Malibu Maxx, the 2006 Chevrolet Monte Carlo, the 2006 Chevrolet Silverado (all grades), the 2006 Chevrolet SSR, the 2006 Chevrolet Suburban, the 2006 Chevrolet Tahoe, the 2006 Chevrolet TrailBlazer, the 2006 Chevrolet Uplander (all grades), the 2007 Chevrolet Avalanche, the 2007 Chevrolet Aveo, the 2007 Chevrolet Cobalt, the 2007 Chevrolet Colorado, the 2007 Chevrolet Corvette, the 2007 Chevrolet Equinox, the 2007 Chevrolet Express (all grades), the 2007 Chevrolet HHR, the 2007 Chevrolet Impala, the 2007 Chevrolet Malibu, the 2007 Chevrolet Malibu Maxx, the 2007 Chevrolet Monte Carlo, the 2007 Chevrolet Silverado (all grades), the 2007 Chevrolet Suburban, the 2007 Chevrolet Tahoe, the 2007 Chevrolet TrailBlazer, the 2007 Chevrolet Uplander (all grades), the 2008 Chevrolet Avalanche, the 2008 Chevrolet Aveo, the 2008 Chevrolet Cobalt, the 2008



Chevrolet Colorado, the 2008 Chevrolet Corvette, the 2008 Chevrolet Equinox, the 2008 Chevrolet Express (all grades), the 2008 Chevrolet HHR, the 2008 Chevrolet Impala, the 2008 Chevrolet Malibu, the 2008 Chevrolet Silverado (all grades), the 2008 Chevrolet Suburban, the 2008 Chevrolet Tahoe, the 2008 Chevrolet Tahoe Hybrid, the 2008 Chevrolet TrailBlazer, the 2008 Chevrolet Uplander (all grades), the 2009 Chevrolet Avalance, the 2009 Chevrolet Aveo, the 2009 Chevrolet Cobalt, the 2009 Chevrolet Colorado, the 2009 Chevrolet Corvette, the 2009 Chevrolet Equinox, the 2009 Chevrolet Express (all grades), the 2009 Chevrolet HHR, the 2009 Chevrolet Impala, the 2009 Chevrolet Malibu, the 2009 Chevrolet Silverado (all grades), the 2009 Chevrolet Suburban, the 2009 Chevrolet Tahoe, the 2009 Chevrolet TrailBlazer, the 2009 Chevrolet Traverse, the 2003 GMC Envoy (all grades), the 2003 GMC Safari (all grades), the 2003 GMC Savana (all grades), the GMC Sierra (all grades), the GMC Sonoma, the GMC Yukon (all grades), the 2004 GMC Canyon, the 2004 GMC Envoy (all grades), the 2004 GMC Safari (all grades), the 2004 GMC Savana (all grades), the 2004 GMC Sierra (all grades), the 2004 GMC Sonoma, the 2004 GMC Yukon (all grades), the 2005 GMC Canyon, the 2005 GMC Envoy (all grades), the 2005 GMC Safari (all grades), the 2005 GMC Savana (all grades), the 2005 GMC Sierra (all grades), the 2005 GMC Yukon (all grades), the 2006 GMC Canyon, the 2006 GMC Envoy (all grades), the 2006 GMC Savana (all grades), the 2006 GMC Sierra (all grades), the 2006 GMC Yukon (all grades), the 2007 GMC Acadia, the 2007 GMC Canyon, the 2007 GMC Envoy, the 2007 GMC Savana (all grades), the 2007 GMC Sierra (all grades), the 2007 GMC Yukon (all grades), the 2008 GMC Acadia, the 2008 GMC Canyon, the 2008 GMC Envoy, the 2008 GMC Savana (all grades), the 2008 GMC Sierra (all grades), the 2008 GMC Yukon (all grades), the 2009 GMC Acadia, the 2009 GMC Canyon, the 2009 GMC Envoy, the 2009

GMC Savana (all grades), the 2009 GMC Sierra (all grades), the 2009 GMC Yukon (all grades), the 2003 HUMMER H1, the 2003 HUMMER H2, the 2004 HUMMER H1, the 2004 HUMMER H2, the 2005 HUMMER H1, the 2005 HUMMER H2, the 2005 HUMMER H3, the 2006 HUMMER H1, the 2006 HUMMER H2, the 2006 HUMMER H3, the 2007 HUMMER H2, the 2007 HUMMER H3, the 2008 HUMMER H2, the 2008 HUMMER H3, the 2009 HUMMER H2, the 2009 HUMMER H3, the 2003 Pontiac Aztek, the 2003 Pontiac Bonneville, the 2003 Pontiac Grand Am, the 2003 Pontiac Grand Prix, the 2003 Pontiac Montana, the 2003 Pontiac Sunfire, and the 2003 Pontiac Vibe, the 2004 Pontiac Aztek, the 2004 Pontiac Bonneville, the 2004 Pontiac G6, the 2004 Pontiac Grand Am, the 2004 Pontiac Grand Prix, the 2004 Pontiac GTO, the 2004 Pontiac Montana, the 2004 Pontiac Sunfire, and the 2004 Pontiac Vibe, the 2005 Pontiac Aztek, the 2005 Pontiac Bonneville, the 2005 Pontiac G6, the 2005 Pontiac Grand Am, the 2005 Pontiac Grand Prix, the 2005 Pontiac GTO, the 2005 Pontiac Montana, the 2005 Pontiac Montana SV6, the 2005 Pontiac Sunfire, and the 2005 Pontiac Vibe, the 2006 Pontiac G6, the 2006 Pontiac Grand Prix, the 2006 Pontiac GTO, the 2006 Pontiac Montana SV6, the 2006 Pontiac Solstice, the 2006 Pontiac Torrent, and the 2006 Pontiac Vibe, the 2007 Pontiac G5, the 2007 Pontiac G6, the 2007 Pontiac Grand Prix, the 2007 Pontiac Solstice, the 2007 Pontiac Torrent, and the 2007 Pontiac Vibe, the 2008 Pontiac G5, the 2008 Pontiac G6, the 2008 Pontiac G8, the 2008 Pontiac Grand Prix, the 2008 Pontiac Solstice, the 2008 Pontiac Torrent, and the 2008 Pontiac Vibe, the 2009 Pontiac G3, the 2009 Pontiac G5, the 2009 Pontiac G6, the 2009 Pontiac G8, the 2009 Pontiac Solstice, the 2009 Pontiac Torrent, and the 2009 Pontiac Vibe, the 2003 Saab 9-3 (all grades) and the 2003 Saab 9-5 (all grades), the 2004 Saab 9-3 (all grades) and the 2004 Saab 9-5 (all grades), the 2005 Saab 9-2 (all grades), the 2005 Saab 9-3

(all grades), the 2005 Saab 9-5 (all grades), and the 2005 Saab 9-7 (all grades), the 2006 Saab 9-2 (all grades), the 2006 Saab 9-3 (all grades), the 2006 Saab 9-5 (all grades), the 2006 Saab 9-7 (all grades), the 2007 Saab 9-3 (all grades), the 2007 Saab 9-5 (all grades), and the 2007 Saab 9-7 (all grades), the 2008 Saab 9-3 (all grades), the 2008 Saab 9-5 (all grades), the 2008 Saab 9-7, the 2008 Turbo X Sport Sedan, and the 2008 Turbo X SportCombi, the 2009 Saab 9-3 (all grades), the 2009 Saab 9-5 (all grades), and the 2009 Saab 9-7 (all grades), the 2003 Saturn Ion, the 2003 Saturn LS, the 2003 Saturn LW, and the 2003 Saturn VUE, the 2004 Saturn Ion, the 2004 Saturn L-Series, and the 2004 Saturn VUE, the 2005 Saturn Ion, the 2005 Saturn L-Series, the 2005 Saturn Relay, and the 2005 Saturn VUE, the 2006 Saturn Aura, the 2006 Saturn Ion, the 2006 Saturn Relay, the 2006 Saturn Sky, and the 2006 Saturn VUE. The 2007 Saturn Aura, the 2007 Saturn Ion, the 2007 Saturn Outlook, the 2007 Saturn Relay, the 2007 Saturn Sky, and the 2007 Saturn VUE, the 2008 Saturn Astra, the 2008 Saturn Aura, the 2008 Saturn Outlook, the 2008 Saturn Sky, and the 2008 Saturn VUE, the 2009 Saturn Astra, the 2009 Saturn Aura, the 2009 Saturn Aura Hybrid Sedan, the 2009 Saturn Outlook, the 2009 Saturn Sky, the 2009 Saturn VUE, and the 2009 Saturn VUE Green Line, as well as any other GM vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.

24. Volkswagen infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by Volkswagen each time an infringing Volkswagen vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing Volkswagen vehicles include the 2003 Audi A6 and the

2004 Volkswagen Golf vehicles, the 2003 Euro Van, the 2003 Golf, the 2003 GTI, the 2003 Jetta Sedan, the 2003 Jetta Wagon, the 2003 New Beetle Convertible, the 2003 New Beetle Coupe, the 2003 Passat, and the 2003 Passat Wagon. The 2004 Golf, the 2004 GTI, the 2004 Jetta Sedan, the 2004 Jetta Wagon, the 2004 New Beetle Convertible, the 2004 New Beetle Coupe, the 2004 Passat, the 2004 Passat Wagon, the 2004 Phaeton, the 2004 R32, the 2004 Toureg, the 2005 Golf, the 2005 GTI, the 2005 Jetta, the 2005 Jetta A5, the 2005 Jetta Wagon, the 2005 New Beetle Coupe, the 2005 New Beetle Convertible, the 2005 Passat, the 2005 Phaeton, the 2005 Touareg, the 2006 Golf, the 2006 GTI, the 2006 Jetta, the 2006 New Beetle Coupe, the 2006 New Beetle Convertible, the 2006 Passat, the 2006 Passat Wagon, the 2006 Phaeton, the 2006 Rabbit, the 2006 Touareg, the 2007 Eos, the 2007 GTI, the 2007 Jetta, the 2007 New Beetle Coupe, the 2007 New Beetle Convertible, the 2007 Passat, the 2007 Passat Wagon, the 2007 Rabbit, the 2007 Touareg, the 2008 CC, the 2008 Eos, the 2008 GLI, the 2008 GTI, the 2008 Jetta, the 2008 Jetta Wagon, the 2008 New Beetle Coupe, the 2008 New Beetle Convertible, the 2008 Passat, the 2008 Passat Wagon, the 2008 R32, the 2008 Rabbit, the 2008 Routan, the 2008 Tiguan, the 2008 Touareg, the 2009 CC, the 2009 Eos, the 2009 GLI, the 2009 GTI, the 2009 Jetta, the 2009 Jetta Sportswagen, the 2009 New Beetle Convertible, the 2009 New Beetle Coupe, the 2009 Passat, the 2009 Passat Wagon, the 2009 Rabbit, the 2009 Routan, the 2009 Tiguan, the 2009 Touareg 2, the 2003 Audi A4, the 2003 Audi A6, the 2003 Audi A8, the 2003 Audi Allroad, the 2003 Audi RS6, the 2003 Audi S6, the 2003 Audi S8, the 2003 Audi TT, the 2004 Audi A4, the 2004 Audi A6, the 2004 Audi A8, the 2004 Audi A8 L, the 2004 Audi Allroad, the 2004 Audi S4, the 2004 Audi TT, the 2005 Audi A4, the 2005 Audi A6, the 2005 Audi A8, the 2005 Audi A8 L, the 2005 Audi Allroad, the 2005 Audi RS 4, the 2005 Audi S4, the 2005 Audi TT, the

2006 Audi A3, the 2006 Audi A4, the 2006 Audi A6, the 2006 Audi A8, the 2006 Audi A8 L, the 2006 Audi Allroad, the 2006 Audi RS 4, the 2006 Audi S4, the 2006 Audi TT, the 2007 Audi A3, the 2007 Audi A4, the 2007 Audi A6, the 2007 Audi A8, the 2007 Audi A8 L, the 2007 Audi Q7, the 2007 Audi RS 4, the 2007 Audi S4, the 2007 Audi S6, the 2007 Audi S8, the 2007 Audi TT, the 2008 Audi A3, the 2008 Audi A4, the 2008 Audi A5, the 2008 Audi A6, the 2008 Audi A8 L, the 2008 Audi Q7, the 2008 Audi RS 4, the 2008 Audi S4, the 2008 Audi S5, the 2008 Audi S6, the 2008 Audi S8, the 2008 Audi TT, the 2009 Audi A5, the 2009 Audi A6, the 2009 Audi A8 L, the 2009 Audi Q7, the 2009 Audi R8, the 2009 Audi S4, the 2009 Audi S6, the 2009 Audi S8, the 2009 Audi TT, and the 2009 Audi TTS as well as any other Volkswagen vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.

25. BMW infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by BMW each time an infringing BMW vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing BMW vehicles include the 2003 325Ci Coupe, the 2003 330Ci Coupe, the 2003 M3 Coupe, the 2003 325Ci Convertible, the 2003 330Ci Convertible, the 2003 M3 Convertible, the 2003 425i Sedan RWD, the 2003 325xi Sedan AWD, the 2003 330i Sedan RWD, the 2003 330xi Sedan AWD, the 2003 325i Sport Wagon RWD, the 2003 325i Sport Wagon AWD, the 2003 325xi Sport Wagon RWD SULEV, the 2003 325i Sedan RWD SULEV, the 2003 325i Sedan RWD South Africa, the 2003 325Ci Coupe SULEV, the 2003 525i Sedan Manual, the 2003 525i Sedan Auto, the 2003 530i Sedan Manual, the 2003

530iA Sedan Auto, the 2003 540i Sedan Manual, the 2003 M5 Sedan Manual, the 2003 525iT Sport Wagon Manual, the 2003 525iT Sport Wagon Auto, the 2003 540iTA Sport Wagon Auto, the 2003 745i Sedan, the 2003 745Li Sedan, the 2003 760Li Sedan, the 2003 X5 3.0i, the 2003 X5 4.4i, the 2003 X5 4.6is, the 2003 Z4 Roadster 2.5i, the 2003 Z4 Roadster 3.0i, the 2003 Z8 Roadster, and the 2003 Z8 Alpina Roadster, the 2004 325Ci Coupe, the 2004 325Ci Coupe SULEV, the 2004 330Ci Coupe, the 2004 325Ci Convertible, the 2004 330Ci Convertible, the 2004 330i Sedan, the 2004 325xi Sedan, the 2004 325i Sedan, the 2004 330xi Sedan, the 2004 325iT Sports Wagon, the 2004 325xi Sports Wagon, the 2004 325xi Sedan, the 2004 325i Sports Wagon, the 2004 525i Sedan, the 2004 530i Sedan, the 2004 545i Sedan, the 2004 545iA Sedan, the 2004 645Ci Coupe, the 2004 645Ci Convertible, the 2004 745i Sedan, the 2004 745Li Sedan, the 2004 760L Sedan, the 2004 760i Sedan, the 2004 760i Sedan, the 2004 X3 3.0i SAV, the 2004 X3 2.5i SAV, the 2004 X5 4.4i SAV, the 2004 X5 2.8is SAV, the 2004 X5 3.0i SAV, the 2004 X5 4.4i, the 2004 X5 4.8is, the 2004 Z4 2.5i Roadster, the 2004 Z4 Roadster 3.0i, the 2004 M3 Coupe, and the 2004 M3 Convertible, the 2005 325Ci Coupe, the 2005 325Ci Coupe SULEV, the 2005 330Ci Coupe, the 2005 M3 Coupe, the 2005 325Ci Convertible, the 2005 330Ci Convertible, the 2005 M3 Convertible, the 2005 325i Sedan, the 2005 325i Sedan SULEV, the 2005 325xi Sedan, the 2005 330i Sedan, the 2005 330xi Sedan, the 2005 325i Sport Wagon, the 2005 325i Sport Wagon RWD SULEV, the 2005 325xi Sport Wagon AWD, the 2005 525i Sedan, the 2005 530i Sedan, the 2005 545i Sedan, the 2005 645Ci Coupe, the 2005 645Ci Convertible, the 2005 745i Sedan, the 2005 745Li Sedan, the 2005 760i Sedan, the 2005 760Li Sedan, the 2005 M3, the 2005 X3 2.5i, the 2005 X3 3.0i, the 2005 X5 3.0i, the 2005 X5 4.4i, the 2005 X5 4.8is, the 2005 Z4 Roadster 2.5i, and the 2005 Z4 Roadster 3.0i, the

2006 325i Sedan, the 2006 330i Sedan, the 2006 325Ci Coupe, the 2006 325Ci Coupe SULEV, the 2006 330Ci Coupe, the 2006 M3 coupe, the 2006 325Ci Convertible, the 2006 330Ci Convertible, the 2006 M3 convertible, the 2006 325xi Sedan, the 2006 330xi Sedan, the 2006 325xi Sport Wagon, the 2006 525i Sedan, the 2006 530i Sedan, the 2006 525xi Sedan, the 2006 530xi Sedan, the 2006 550i Sedan, the 2006 M5 Sedan, the 2006 650Ci Coupe, the 2006 650 Ci Convertible, the 2006 M6 Coupe, the 2006 750i Sedan, the 2006 750Li Sedan, the 2006 760i Sedan, the 2006 760Li Sedan, the 2006 X3, the 2006 X5 3.0i, the 2006 X5 4.4i, the 2006 X5 4.8is, the 2006 Z4 Roadster 3.0i, the 2006 Z4 Roadster 3.0si, the 2006 Z4 M Roadster, the 2006 Z4 Coupe 3.0si, and the 2006 Z4 M Coupe, the 2007 328i Coupe, the 2007 328i SULEV, the 2007 328xi Coupe, the 2007 328xi SULEV, the 2007 335i Coupe, the 2007 328i Sedan, the 2007 328i Sedan SULEV, the 2007 328xi Sedan, the 2007 328xi Sedan SULEV, the 2007 335i Sedan, the 2007 328i Sport Wagon, the 2007 328xi Sport Wagon, the 2007 328i Convertible, the 2007 328i Convertible SULEV, the 2007 335i Convertible, the 2007 335xi Sedan, the 2007 525i Sedan, the 2007 525xi Sedan, the 2007 530i Sedan, the 2007 530xi Sedan, the 2007 550i Sedan, the 2007 530xiT Sport Wagon, the 2007 M5 Sedan, the 2007 650i Coupe, the 2007 M6 Coupe, the 2007 650i Convertible, the 2007 M6 Convertible, the 2007 750i Sedan, the 2007 750Li Sedan, the 2007 760Li Sedan, the 2007 Alpina B7 Sedan, the 2007 X3 3.0si, the 2007 X5 3.0si, the 2007 X5 4.8i, the 2007 Z4 3.0si Coupe, the 2007 Z4 Coupe M, the 2007 Z4 Roadster 3.0i, the 2007 Z4 Roadster 3.0si, and the 2007 Z4 Roadster M, the 2008 128i Coupe, the 2008 128i SULEV, the 2008 135i Coupe, the 2008 128i Cabriolet, the 2008 128i Cabriolet SULEV, the 2008 135i Cabriolet, the 2008 M3 Coupe, the 2008 M3 Convertible, the 2008 M3 Sedan, the 2008 328i Coupe, the 2008 328i Coupe SULEV, the 2008 328xi Coupe, the 2008 335i Coupe, the 2008 328i

Convertible, the 2008 328i Convertible SULEV, the 2008 335i Convertible, the 2008 328i Sedan, the 2008 329i Sedan SULEV, the 2008 328xi Sedan, the 2008 328xi Sedan SULEV, the 2008 335i Sedan, the 2008 335xi Sedan, the 2008 328i Sport Wagon, the 2008 328xi Sport Wagon, the 2008 528i Sedan, the 2008 528xi Sedan, the 2008 535i Sedan, the 2008 535xi Sedan, the 2008 550i Sedan, the 2008 M5 Sedan, the 2008 535xiT Sport Wagon, the 2008 M6 Coupe, the 2008 M6 Convertible, the 2008 650i Coupe, the 2008 650i Convertible, the 2008 750i Sedan, the 2008 Alpina B7 Sedan, the 2008 750Li Sedan, the 2008 760Li Sedan, the 2008 X3 3.0si, the 2008 X5 3.0si, the 2008 X5 4.8i, the 2008 X6 xDrive35i, the 2008 X6 xDrive50i, the 2008 Z4 3.0si Coupe, the 2008 Z4 M Coupe, the 2008 Z4 Roadster 3.0si, and the 2008 Z4 M Roadster, the 2009 128i Coupe, the 2009 135i Coupe, the 2009 128i Convertible, the 2009 135i Convertible, the 2009 328i sedan, the 2009 335i xDrive Sedan, the 2009 335i Coupe, the 2009 335i Convertible, the 2009 335d Sedan, the 2009 328i xDrive Sedan, the 2009 328i Coupe, the 2009 335i xDrive Coupe, the 2009 328i Sports Wagon, the 2009 335i Sedan, the 2009 328i xDrive Coupe, the 2009 328i Convertible, the 2009 328i xDrive Sports Wagon, the 2009 528i Sedan, the 2009 528i xDrive Sedan, the 2009 535i Sedan, the 2009 535i xDrive Sedan, the 2009 550i Sedan, the 2009 535i xDrive Sports Wagon, the 2009 650i Coupe, the 2009 650i Convertible, the 2009 750i Sedan, the 2009 750Li Sedan, the 2009 760Li Sedan, the 2009 X3 xDrive30i, the 2009 X5 xDrive30i, the 2009 X5 xDrive48i, the 2009 X5 xDrive35d, the 2009 X6 xDrive35i, the 2009 X6 xDrive50i, the 2009 Z4 Roadster 3.0i, the 2009 Z4 Roadster 3.0si, the 2009 Z4 Coupe 3.0si, the 2009 M3 Sedan, the 2009 M3 Coupe, the 2009 M3 Convertible, the 2009 M5 Sedan, the 2009 M6 Coupe, the 2009 M6 Convertible, the 2009 Z4 M Coupe , and the 2009 Z4 M



Roadster vehicles, as well as any other BMW vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.

26. Mercedes-Benz infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by Mercedes-Benz each time an infringing Mercedes-Benz vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing Mercedes-Benz vehicles include the 2003- present Mercedes-Benz C-Class vehicle, C230, C230 C, C230 CL 1.8, C230 CL1-8, C230 Wagon 4M, C230K, C240, C240 4M, C240 S, C240-4M, C240 S, C240S-4M, C280, C289 4M, C280-4M, C32 AMG, C320, C320 4M, C320 C, C320S, C320S-4M, C350, C350 4M, C350-4M, C55 AMG, C55AMG, CL 500, CL 55 AMG, CL 600, CL 65 AMG, CL500, CL600, CL600 BI Turbo, CL 600 BITURBO, CL63 AMG, CL 65 AMG, CLK 320, CLK 350A, CLK 500, CLK 55 AMG, CLK320, CLK320A, CLK350, CLK350A, CLK430A, CLK450A, CLK500, CLK500A, CLK55 AMG, CLK550, CLK550A, CLK55A AMG, CLK63 AMG BLK, CLKa63A AMG, CLS 550, CLS550, CLS63, E250S-4M, E320, E320 CD1, E320 CDI, E320-4M, E320CD1, E320S-4M, E350, E350 S, E350 S-4M, E350-4M, E500, E500-4M, E500S-4M, E500, E500-4M, E500S-4M, E55 AMG, E550, E550-4M, E55AMG, E55S-4M, E63 AMG, E63 AMG WAGON, E63AMG, GL320CDI, GL450, ML 320, ML 350, ML320, ML320CDI, ML350, ML500, ML550, ML63AMG, R320 CDI, R350, R350 2WD, R500, R63 AMG, S350, S430, S430V 4M, S430V-4M, S500, S500 4M, S55 AMG, S550, S550-4M, S600, S600 BiTurbo, S63 AMG, S65 AMG, SLK230, SLK280, SLK32, SLK320, SLK350, and SLK55 AMG as well as any other Mercedes-Benz

vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.

27. Suzuki infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by providing a vehicle with an air bag restraint system, anti-lock braking system, and/or electronic stability control system that performs the claimed method. In particular, the '364 patent is infringed by Suzuki each time an infringing Suzuki vehicle is started, whereby the method for testing a sensor as described and claimed in the '364 patent is performed. Infringing Suzuki vehicles include the 2005 Suzuki Forenza vehicle, The 2003 Suzuki Aerio, the 2003 Suzuki Grand Vitara, the 2003 Suzuki Vitara, the 2003 Suzuki XL-7, the 2004 Suzuki Aerio, the 2004 Suzuki Forenza, the 2004 Suzuki Grand Vitara, the 2004 Suzuki Verona, the 2004 Suzuki Vitara V6, and the Suzuki XL-7, the 2005 Suzuki Aerio, the 2005 Suzuki Forenza, the 2005 Suzuki Grand Vitara, the 2005 Suzuki Reno, the 2005 Suzuki Verona, and the Suzuki XL-7, the 2006 Suzuki 2006 Aerio, the 2006 Suzuki Forenza, the 2006 Suzuki Grand Vitara, the 2006 Suzuki Reno, the 2006 Suzuki Verona, and the 2006 Suzuki XL-7, the 2007 Suzuki Aerio, the 2007 Suzuki Forenza, the 2007 Suzuki Grand Vitara, the 2007 Suzuki Reno, the 2007 Suzuki SX4, and the 2007 Suzuki XL7, the 2009 Suzuki Equator, the 2009 Suzuki Grand Vitara, and the 2009 Suzuki SX4, as well as any other Suzuki vehicle that performs the method for testing a sensor that is the same as or equivalent to the method used in these exemplary vehicles.
28. ADI infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by making, offering to sell, selling, and/or using sensors provided in infringing vehicles provided by car manufacturers, as described above, and/or in other products, including but not limited to Analog Devices ADXL202 JQC, Analog Devices

ADXL250, Analog Devices ADXL278, and any other chips that are capable of or use the same or similar self-test feature.

29. Freescale infringes one or more of claims 1-6 of the '364 patent directly, contributorily, and/or through inducement by making, offering to sell, selling, and using sensors provided in infringing vehicles provided by car manufacturers, as described above, and/or in other products, including but not limited to Freescale SX322, Freescale SX2201, Freescale SX2202, Freescale SX3201, Freescale SX3205, Freescale SX3209, Freescale MMA3201D, Freescale MMA3202D, and any other chips that are capable of or use the same or similar self-test feature.
30. The Defendants' infringement of the '364 patent alleged above has injured Wacoh and thus, it is entitled to recover damages adequate to compensate for the Defendants' infringement, which in no event can be less than a reasonable royalty.

#### **DEMAND FOR JURY TRIAL**

31. Wacoh hereby demands a jury trial on all claims and issues triable of right by a jury.

#### **PRAYER FOR RELIEF**

Wherefore, Wacoh prays for entry of judgment:

- A. that Defendants, Chrysler, Ford, Honda, Mazda, GM, Volkswagen, BMW, Mercedes-Benz, Suzuki, ADI and Freescale have infringed one or more claims of the '364 patent;
- B. that Defendants, Chrysler, Ford, Honda, Mazda, GM, Volkswagen, BMW, Mercedes-Benz, Suzuki, ADI and Freescale account for and pay to Wacoh all damages caused by the infringement of the '364 patent, which by statute can be no less than a reasonable royalty;

C. that Wacoh be granted pre-judgment and post-judgment interest on the damages caused to him by reason of Defendants, Chrysler, Ford, Honda, Mazda, GM, Volkswagen, BMW, Mercedes-Benz, Suzuki, ADI and Free scale's infringement of the '364 patent;

D. that Wacoh be granted its attorneys' fees in this action;

E. that costs be awarded to Wacoh;

F. that Wacoh be granted such other and further relief as the Court may deem just and proper under the current circumstances.

Dated: November 21, 2008

Respectfully submitted,

/s/ Matthew J.M. Prebeg

Edward W. Goldstein

Matthew J.M. Prebeg

Alisa A. Lipski

GOLDSTEIN, FAUCETT & PREBEG, LLP

1177 West Loop South, Suite 400

Houston, TX 77027

Tel: 713-877-1515

Fax: 713-877-1745

E-mail: [egoldstein@gfpiplaw.com](mailto:egoldstein@gfpiplaw.com)

[mprebeg@gfpiplaw.com](mailto:mprebeg@gfpiplaw.com)

[alipski@gfpiplaw.com](mailto:alipski@gfpiplaw.com)

Catherine Cetrangolo

BOARDMAN LAW FIRM LLP

One South Pinckney Street, 4th Floor

Madison, WI 53703

Tel: 609-283-1703

Fax: 608-283-1709

E-mail: [ccetrangolo@boardmanlawfirm.com](mailto:ccetrangolo@boardmanlawfirm.com)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2008 the foregoing document was served upon counsel of record named below via E-mail and First Class Mail (\*).

**Counsel for Chrysler LLC**

Frank C. Cimino, Jr.* Kimberly R. Parke Robert L. Kinder, Jr. <b>Dickstein Shapiro LLP</b> 1825 Eye Street, N.W. Washington, DC 20006 Email: ciminof@dicksteinshapiro.com Email: parkek@dicksteinshapiro.com Email: kinder@dicksteinshapiro.com	Meg Vergeront John Wright <b>Stafford Rosenbaum LLP</b> 222 W. Washington Ave., Suite 900 Madison, WI 53701-1784 Email: mvergeront@staffordlaw.com
---	---

**Counsel for Ford Motor Company**

Matthew J. Moore* Brian S. Seal <b>Howrey LLP</b> 1299 Pennsylvania Ave NW Washington, DC 20004 E-mail: moorem@howrey.com E-mail: sealb@howrey.com  Thomas A. Miller Jeffrey J. Phillips <b>Howrey LLP</b> 111 Louisiana, 25 <sup>th</sup> Floor Houston, TX 77002-5242 E-mail: millert@howrey.com E-mail: phillipsj@howrey.com	Michael J. Modl Andrew J. Clarkowski <b>Axley Brynelson, LLP</b> 2 East Mifflin Street, Suite 200 Madison, Wisconsin 53703 E-mail: mmodl@axley.com E-mail: aclarkowski@axley.com
---	--

**Counsel for Mazda Motor of America, Inc. and American Suzuki Motor Corporation**

Matthew J. Moore* Brian S. Seal <b>Howrey, LLP</b> 1299 Pennsylvania Ave., NW Washington, DC 20004-2402 E-mail: moorem@howrey.com sealb@howrey.com  Heather H. Fan <b>Howrey LLP</b> 550 South Hope Street, Suite 1100 Los Angeles, CA 90071 E-mail: fanh@howrey.com	Michael J. Modl Andrew J. Clarkowski <b>Axley Brynelson, LLP</b> 2 East Mifflin Street, Suite 200 Madison, Wisconsin 53703 E-mail: mmodl@axley.com E-mail: aclarkowski@axley.com
--	--

**Counsel for American Honda Motor Co., Inc.**

<p>Robert C. Morgan Denise L. Loring Brian P. Biddinger Hiroyuki Hagiwara <b>Ropes &amp; Gray LLP</b> 1211 Avenue of The Americas New York, New York 10036-8704 E-mail: denise.loring@ropesgray.com robert.morgan@ropesgray.com brian.biddinger@ropesgray.com hiroyuki.hagiwara@ropesgray.com</p>	<p>Allen A. Arntsen Justin Edwin Gray * <b>Foley &amp; Lardner LLP</b> 150 E. Gilman Street P.O. Box 1497 Madison, WI 53701-1497 E-mail: jgray@foley.com aarntsen@foley.com  James T. McKeown <b>Foley &amp; Lardner LLP</b> 777 E. Wisconsin Avenue Milwaukee, WI 53202-5306</p>
---	---

**Counsel for GM Corporation**

<p>Joseph J. Berghammer* Jason S. Shull <b>Banner &amp; Witcoff, Ltd.</b> Ten South Wacker Dr., Suite 3000 Chicago, IL 60606 E-mail: jberghammer@bannerwitcoff.com jshull@bannerwitcoff.com</p>	
---	--

**Counsel for Volkswagen Group of America, Inc.**

<p>Michael J. Lennon* Susan A. Smith Georg Reitboeck <b>Kenyon &amp; Kenyon LLP</b> 1500 K Street, NW Washington, DC 20005-1257 E-mail: mlennon@kenyon.com E-mail: ssmith@kenyon.com E-mail: greitboeck@kenyon.com</p>	<p>Eugenia G. Carter <b>Whyte Hirschboeck Dudek S.C.</b> 33 East Main Street, Suite 300 Madison, WI 53703-3300 E-mail: gcarter@whdlaw.com</p>
--	---

**Counsel for BMW of North America, LLC**

<p>Joseph P. Lavelle* Thomas M. Dunham Vivian Kuo Christopher Cuneo <b>Howrey LLP</b> 1299 Pennsylvania Ave NW Washington, DC 20004 E-mail: lavellej@howrey.com E-mail: dunhamt@howrey.com</p>	<p>Michael. J. Modl Andrew J. Clarkowski <b>Axley Brynelson, LLP</b> 2 East Mifflin Street, Suite 200 Madison, Wisconsin 53703 E-mail: mmodl@axley.com E-mail: aclarkowski@axley.com</p>
--	--

E-mail: kuov@howrey.com E-mail: cuneoc@howrey.com	
--	--

**Counsel for Mercedes-Benz USA, LLC:**

Mitchell G. Stockwell * Vaibhav P. Kadaba Bonnie M. Grant <b>Kilpatrick Stockton LLP</b> 1100 Peachtree Street, Suite 2800 Atlanta, GA 30309-4530 E-mail: mstockwell@kilpatrickstockton.com E-mail: vkadaba@kilpatrickstockton.com E-mail: bgrant@kilpatrickstockton.com	Joseph Wright Meg Vergeront <b>Stafford Rosenbaum LLP</b> 222 West Washington Ave., Suite 900 Madison, WI 53703 E-mail: mvergeront@staffordlaw.com jwright@staffordlaw.com
--	--

**Counsel for Analog Devices, Inc.:**

James R. Cole Gregory T. Everts Josephine K. Benkers <b>Quarles &amp; Brady LLP</b> 33 East Main Street Madison, WI 53703 E-mail: jrc@quarles.com gte@quarles.com jbenkers@quarles.com	
--	--

**Counsel for Freescale Semiconductor, Inc.:**

J. Donald Best* Paul D. Barbato <b>Michael Best &amp; Friedrich LLP</b> One South Pinckney Street, Suite 700 Madison, Wisconsin 53703 Email: jdbest@michaelbest.com pdbarbato@michaelbest.com	David Witcoff Brent P. Ray John M. Michalik <b>Jones Day</b> 77 West Wacker Drive, Suite 3500 Chicago, Illinois 60601-1692 Email: dlwitcoff@jonesday.com bpray@jonesday.com jmichalik@jonesday.com  Blaney Harper <b>Jones Day</b> 51 Louisiana Avenue, N.W. Washington, D.C. 20001-2113 Email: bharper@jonesday.com
---	--

---

/s/ Matthew J.M. Prebeg  
Matthew J.M. Prebeg