

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**BULLETPROOF PROPERTY
MANAGEMENT LLC,**

Plaintiff,

v.

**TESLA, INC.; JOHN DOES Nos. 1-20,
unknown persons,**

Defendants.

Case No. 1:25-cv-665-ADA

JURY TRIAL DEMANDED

**TESLA, INC.’S ANSWER, AFFIRMATIVE DEFENSES
AND COUNTERCLAIMS TO PLAINTIFF’S AMENDED COMPLAINT**

Defendant, Tesla, Inc. (“Tesla”), files this Answer and Affirmative Defenses to Bulletproof Property Management LLC’s (“Bulletproof”) Amended Complaint (“Amended Complaint”). Tesla responds to the allegations contained in the numbered paragraphs of Bulletproof’s Amended Complaint below. Tesla denies the allegations and characterizations in Bulletproof’s Amended Complaint and attached exhibits unless expressly admitted in the following paragraphs.

INTRODUCTION¹

1. Tesla admits that U.S. Patent No. 11,932,230 (“’230 Patent”) appears on its face to be invented by Bennet Langlotz and to have issued on March 19, 2024. Tesla is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 1 of the Amended Complaint, and therefore denies them.

¹ Tesla repeats the headings set forth in the Complaint to simplify comparison of the Complaint and this Answer. In doing so, Tesla makes no admissions regarding the substance of the headings or any other allegations of the Complaint. Unless otherwise stated, to the extent that a particular heading can be construed as an allegation, Tesla specifically denies all such allegations.

2. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 of the Amended Complaint, and therefore denies them.

3. Tesla admits the abstract of the '230 Patent states “[a] motor vehicle for operation by a driver has a frame with wheels and a motor connected to the frame. A steering control is connected to the wheels to establish a steering angle. A controller is operably connected to the steering control, to the motor, and to the wheels, and is operable to selectably drive the wheels in a forward direction in a drive mode and in a rearward direction in a reverse mode. The controller is operable to select a direction for driving the wheels in response to a pattern of steering angle movements, without operator indication of a direction,” but otherwise denies that the allegations of Paragraph 3 provide an accurate or complete description of the patent.

4. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the Amended Complaint, and therefore denies them.

5. Tesla admits that it is a motor vehicle company. Tesla admits that Tesla designed and provides to customers its proprietary Autopilot driver assistance technology and Full Self-Driving supervised autonomous driving technology. Tesla admits that Tesla’s CEO Elon Musk has spoken publicly about these same technologies. Tesla denies all other allegations in Paragraph 5.

6. Tesla denies the allegations in Paragraph 6 of the Amended Complaint.

7. Tesla denies the allegations in Paragraph 7 of the Amended Complaint.

8. Tesla admits that no later than April 5, 2024, it received an undated letter from Bennet Langlotz. Tesla admits that it released firmware update 2024.14 in and around April 2024 which included Tesla’s proprietary Auto Shift feature. Tesla admits that the Tesla Model S Owner’s Manual includes the words “Auto Shift (Beta) can shift between Drive and Reverse, or out of Park, to assist with actions such as turns, parking, or reversing out of a parking spot.” Tesla admits that

Tesla's official X account posted "Auto Shift between D & R is available on newer Model S, 3, X, Y" on March 12, 2025. Tesla denies all other allegations in Paragraph 8.

9. Tesla denies the allegations in Paragraph 9 of the Amended Complaint.

10. Tesla denies the allegations in Paragraph 10 of the Amended Complaint.

11. Tesla admits that U.S. Patent No. 12,221,104 ("104 Patent") appears on its face to have issued on February 11, 2025 to applicant Bulletproof Property Management LLC. Tesla admits that U.S. Patent No. 12,227,184 ("184 Patent") appears on its face to have issued on February 18, 2025 to applicant Bulletproof Property Management LLC. Tesla admits that U.S. Patent No. 12,233,871 ("871 Patent") appears on its face to have issued on February 25, 2025 to applicant Bulletproof Property Management LLC. Tesla admits that U.S. Patent No. 12,240,456 ("456 Patent") appears on its face to have issued on March 4, 2025 to applicant Bulletproof Property Management LLC. Tesla admits that U.S. Patent No. 12,240,457 ("457 Patent") appears on its face to have issued on March 4, 2025 to applicant Bulletproof Property Management LLC. Tesla admits that U.S. Patent No. 12,240,458 ("458 Patent") appears on its face to have issued on March 4, 2025 to applicant Bulletproof Property Management LLC. Tesla is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 11 of the Amended Complaint, and therefore denies them.

12. Tesla denies the allegations in Paragraph 12 of the Amended Complaint.

THE PARTIES

13. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 of the Amended Complaint, and therefore denies them.

14. Tesla admits that Tesla, Inc. is a corporation duly organized and existing under the laws of the State of Texas and has a principal place of business at 1 Tesla Road, Austin, Texas 78725.

15. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 of the Amended Complaint, and therefore denies them.

JURISDICTION AND VENUE

16. Tesla admits the Complaint purports to set forth actions for patent infringement under the Patent Laws of the United States, 35 U.S.C. §§ 1 et seq. and that this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because Plaintiff has alleged infringement of a patent.

17. Tesla does not contest that the Court has personal jurisdiction over it in this case. Tesla denies it has committed or is committing acts of infringement within this district or elsewhere and, on that basis, denies the remaining allegations of Paragraph 17 of the Amended Complaint.

18. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 of the Amended Complaint, and therefore denies them.

19. Tesla denies the allegations in Paragraph 19 of the Amended Complaint. Tesla contests that venue is proper in this district and has filed a motion to transfer venue to the Northern District of California. *See* Dkt. 22.

FACTS

I. Plaintiff Bulletproof Owns All Rights, Title, And Interest To The '230 Patent, A Novel Solution To A Significant Safety Problem With Autonomous Cars Unparking

20. Tesla admits that the '230 Patent appears on its face to have issued on March 19, 2024 to applicant Bulletproof Property Management LLC and is entitled "Vehicle Gear Selection Control." Tesla is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 20 of the Amended Complaint, and therefore denies them.

21. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21 of the Amended Complaint, and therefore denies them.

22. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 of the Amended Complaint, and therefore denies them.

23. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23 of the Amended Complaint, and therefore denies them.

24. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24 of the Amended Complaint, and therefore denies them.

25. Tesla admits that claim 10 of the '230 Patent on its face includes the words “controller is operable to offer an auto-shift and enact the auto shift in response to a user acceptance action on the driver input.” Tesla is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 25 of the Amended Complaint, and therefore denies them.

26. Tesla admits that claim 18 of the '230 Patent on its face includes the words “the offer of an auto-shift being based on at least one of time traveled from a parked position, distance traveled from a parked position, velocity of travel since parked, steering angle, and vehicle location.” Tesla is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 25 of the Amended Complaint, and therefore denies them.

27. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27 of the Amended Complaint, and therefore denies them.

II. Tesla Declines To License The '230 Patent And Instead Willfully Infringes It With Its “Auto Shift” Feature Introduced To Tesla Vehicles in May 2024

28. Tesla denies the allegations in Paragraph 28 of the Amended Complaint.

29. Tesla admits that no later than April 5, 2024, it received an undated letter from Bennet Langlotz. Tesla denies all other allegations in Paragraph 29 of the Amended Complaint.

30. Tesla admits that no later than April 5, 2024, it received an undated letter from Bennet Langlotz. Tesla admits that Tesla's counsel responded to the undated letter in and around May 2, 2024. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '230 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 30 of the Amended Complaint.

31. Tesla admits that it released firmware update 2024.14 in and around April 2024 which included Tesla's proprietary Auto Shift feature. Tesla denies all other allegations in Paragraph 31 of the Amended Complaint.

32. Tesla admits that Bennet Langlotz sent an email to Tesla's counsel in and around May 15, 2024 including the words "based on our initial review, we believe at least claims 1-6, 10-12, and 17-18 are infringed, and likely others may prove to be with a detailed analysis of operation or the underlying software rules" and "[b]ecause of this we must demand Tesla cease and desist from allowing the use of this feature and any additional distribution of the feature." Tesla denies all other allegations in Paragraph 32 of the Amended Complaint.

33. Tesla admits that it presently provides its proprietary Auto Shift feature to customers with select Tesla vehicle models. Tesla admits that Tesla's counsel sent an email to Bennet Langlotz in and around June 24, 2024 stating "[a]fter reviewing the '230 patent, we have determined that a license to that patent is not necessary for Tesla's Autoshift feature that we had been developing over the past several years." Tesla denies all other allegations in Paragraph 33 of the Amended Complaint.

34. Tesla denies the allegations in Paragraph 34 of the Amended Complaint.

35. Tesla admits that Tesla's official X account posted "Auto Shift between D & R is available on newer Model S, 3, X, Y" on March 12, 2025 and that the Model S, X, 3, Y Owner's

Manuals contain a section entitled “Shifting.” Tesla denies all other allegations in Paragraph 35 of the Amended Complaint.

III. Tesla Also Willfully Infringes Plaintiff’s Follow-On Patents

36. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36 of the Amended Complaint, and therefore denies them.

37. Tesla denies the allegations in Paragraph 37 of the Amended Complaint.

38. Tesla denies the allegations in Paragraph 38 of the Amended Complaint.

COUNT I

Direct Patent Infringement of the ’230 Patent, 35 U.S.C. § 271(a)

39. Tesla’s responses to the above Paragraphs are incorporated as though fully set forth herein.

40. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40 of the Amended Complaint, and therefore denies them.

41. Tesla admits that no later than April 5, 2024, it received an undated letter from Bennet Langlotz. Tesla admits that Tesla’s counsel corresponded with Bennet Langlotz via email. Tesla denies all other allegations in Paragraph 41 of the Amended Complaint.

42. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the ’230 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 42 of the Amended Complaint.

43. Tesla denies the allegations in Paragraph 43 of the Amended Complaint.

44. Tesla denies the allegations in Paragraph 44 of the Amended Complaint.

45. Tesla denies the allegations in Paragraph 45 of the Amended Complaint.

46. Tesla admits that Paragraph 46 appears to accurately include the language of Claim 1 of the ’230 Patent. Tesla denies all other allegations in Paragraph 46 of the Amended Complaint.

47. Tesla denies the allegations in Paragraph 47 of the Amended Complaint.

48. Tesla admits that the Accused Products are motor vehicles, but denies it has infringed any claims of the '230 Patent. Tesla denies all other allegations in Paragraph 48 of the Amended Complaint.

49. Tesla admits that the Accused Products have wheels, but denies it has infringed any claims of the '230 Patent. Tesla denies all other allegations in Paragraph 49 of the Amended Complaint.

50. Tesla admits that the Accused Products have a motor, but denies it has infringed any claims of the '230 Patent. Tesla denies all other allegations in Paragraph 50 of the Amended Complaint.

51. Tesla admits that the Model S Owner's Manual includes the words "variable ratio rack and pinion with electronic power steering, speed sensitive." Tesla denies all other allegations in Paragraph 50 of the Amended Complaint.

52. Tesla admits that the Model S Owner's Manual includes sections entitled "car computer." Tesla denies all other allegations in Paragraph 52 of the Amended Complaint.

53. Tesla admits that the Model S Owner's Manual includes the words "[w]hen you open a door to enter Model S, the touchscreen powers on and you can operate all controls. To shift Model S, press the brake pedal and swipe up for Drive or down for Reverse on the touchscreen's drive mode strip (see Shifting)" and "[w]hen you press the brake pedal when parked, the drive mode strip displays on one side of the touchscreen. Use the drive mode strip to shift Model S: swipe up for Drive, swipe down for Reverse or touch the P for Park or N for Neutral. A chime sounds whenever you shift gears." Tesla denies all other allegations in Paragraph 53 of the Amended Complaint.

54. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that Tesla’s official X account posted “Auto Shift between D & R is available on newer Model S, 3, X, Y” on March 12, 2025. Tesla admits that the Model S Owner’s Manual includes the words “Auto Shift (Beta) can shift between Drive and Reverse, or out of Park, to assist with actions such as turns, parking, or reversing out of a parking spot. To enable, touch Controls > Dynamics > Auto Shift (Beta), where you can select between On or from Park. When On, Auto Shift (Beta) lets you shift without using the touchscreen based on your surroundings. This assists with multi-point turns, reversing out of a parking spot, parallel parking, and similar driving maneuvers. When the vehicle assists with shifting, a readiness indicator appears on the instrument cluster.” Tesla denies all other allegations in Paragraph 54 of the Amended Complaint.

55. Tesla denies the allegations in Paragraph 55 of the Amended Complaint.

56. Tesla denies the allegations in Paragraph 56 of the Amended Complaint.

57. Tesla denies the allegations in Paragraph 57 of the Amended Complaint.

COUNT II

Inducing Patent Infringement of the ’230 Patent, 35 U.S.C. § 271(b)

58. Tesla’s responses to the above Paragraphs are incorporated as though fully set forth herein.

59. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59 of the Amended Complaint, and therefore denies them.

60. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the ’230 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 60 of the Amended Complaint.

61. Tesla denies the allegations in Paragraph 61 of the Amended Complaint.

62. Tesla denies the allegations in Paragraph 62 of the Amended Complaint.

63. Tesla admits that Tesla makes available to customers Owner's Manuals that include a section entitled "Shifting" that discusses Tesla's proprietary AutoShift feature. Tesla denies all other allegations in Paragraph 63 of the Amended Complaint.

64. Tesla denies the allegations in Paragraph 64 of the Amended Complaint.

65. Tesla denies the allegations in Paragraph 65 of the Amended Complaint.

COUNT III

Direct Patent Infringement of the '104 Patent, 35 U.S.C. § 271(a)

66. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

67. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67 of the Amended Complaint, and therefore denies them.

68. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 68 of the Amended Complaint.

69. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '104 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 68 of the Amended Complaint.

70. Tesla denies the allegations in Paragraph 70 of the Amended Complaint.

71. Tesla denies the allegations in Paragraph 71 of the Amended Complaint.

72. Tesla denies the allegations in Paragraph 72 of the Amended Complaint.

73. Tesla admits that Paragraph 73 appears to accurately include the language of Claim 1 of the '104 Patent. Tesla denies all other allegations in Paragraph 73 of the Amended Complaint.

74. Tesla denies the allegations in Paragraph 74 of the Amended Complaint.

75. Tesla admits that the Accused Products are motor vehicles that can be operated by a driver, but denies it has infringed any claims of the '104 Patent. Tesla denies all other allegations in Paragraph 75 of the Amended Complaint.

76. Tesla admits that the Accused Products have wheels, but denies it has infringed any claims of the '104 Patent. Tesla denies all other allegations in Paragraph 76 of the Amended Complaint.

77. Tesla admits that the Accused Products have a motor, but denies it has infringed any claims of the '104 Patent. Tesla denies all other allegations in Paragraph 77 of the Amended Complaint.

78. Tesla admits that the Model S Owner's Manual includes the words "variable ratio rack and pinion with electronic power steering, speed sensitive." Tesla denies all other allegations in Paragraph 78 of the Amended Complaint.

79. Tesla admits that the Model S Owner's Manual includes sections entitled "car computer." Tesla denies all other allegations in Paragraph 79 of the Amended Complaint.

80. Tesla admits that the Model S Owner's Manual includes the words "[w]hen you open a door to enter Model S, the touchscreen powers on and you can operate all controls. To shift Model S, press the brake pedal and swipe up for Drive or down for Reverse on the touchscreen's drive mode strip (see Shifting)" and "[w]hen you press the brake pedal when parked, the drive mode strip displays on one side of the touchscreen. Use the drive mode strip to shift Model S: swipe up for Drive, swipe down for Reverse or touch the P for Park or N for Neutral. A chime sounds whenever you shift gears." Tesla denies all other allegations in Paragraph 80 of the Amended Complaint.

81. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that Tesla’s official X account posted “Auto Shift between D & R is available on newer Model S, 3, X, Y” on March 12, 2025. Tesla admits that the Model S Owner’s Manual includes the words “Auto Shift (Beta) can shift between Drive and Reverse, or out of Park, to assist with actions such as turns, parking, or reversing out of a parking spot. To enable, touch Controls > Dynamics > Auto Shift (Beta), where you can select between On or from Park. When On, Auto Shift (Beta) lets you shift without using the touchscreen based on your surroundings. This assists with multi-point turns, reversing out of a parking spot, parallel parking, and similar driving maneuvers. When the vehicle assists with shifting, a readiness indicator appears on the instrument cluster.” Tesla denies all other allegations in Paragraph 81 of the Amended Complaint.

82. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that the Model S Owner’s Manual includes the words “To override the selection, press the brake pedal and use the drive mode strip on the touchscreen to manually shift into your desired Drive Mode. Once you override, you’ll need to shift gears again for Auto Shift (Beta) to reappear. If Auto Shift (Beta) is unavailable, the instrument cluster displays a message.” Tesla denies all other allegations in Paragraph 82 of the Amended Complaint.

83. Tesla denies the allegations in Paragraph 83 of the Amended Complaint.

84. Tesla denies the allegations in Paragraph 84 of the Amended Complaint.

85. Tesla denies the allegations in Paragraph 85 of the Amended Complaint.

COUNT IV

Inducing Patent Infringement of the '104 Patent, 35 U.S.C. § 271(b)

86. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

87. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87 of the Amended Complaint, and therefore denies them.

88. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '104 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 88 of the Amended Complaint.

89. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 89 of the Amended Complaint.

90. Tesla denies the allegations in Paragraph 90 of the Amended Complaint.

91. Tesla admits that Tesla makes available to customers Owner's Manuals that include a section entitled "Shifting" that discusses Tesla's proprietary AutoShift feature. Tesla denies all other allegations in Paragraph 91 of the Amended Complaint.

92. Tesla denies the allegations in Paragraph 92 of the Amended Complaint.

93. Tesla denies the allegations in Paragraph 93 of the Amended Complaint.

COUNT V

Direct Patent Infringement of the '184 Patent, 35 U.S.C. § 271(a)

94. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

95. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 of the Amended Complaint, and therefore denies them.

96. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 96 of the Amended Complaint.

97. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '184 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 97 of the Amended Complaint.

98. Tesla denies the allegations in Paragraph 98 of the Amended Complaint.

99. Tesla denies the allegations in Paragraph 99 of the Amended Complaint.

100. Tesla denies the allegations in Paragraph 100 of the Amended Complaint.

101. Tesla admits that Paragraph 101 appears to accurately include the language of Claim 1 of the '104 Patent. Tesla denies all other allegations in Paragraph 101 of the Amended Complaint.

102. Tesla denies the allegations in Paragraph 102 of the Amended Complaint.

103. Tesla admits that the Accused Products are motor vehicles that can be operated by a driver, but denies it has infringed any claims of the '184 Patent. Tesla denies all other allegations in Paragraph 103 of the Amended Complaint.

104. Tesla admits that the Model S Owner's Manual includes the words "variable ratio rack and pinion with electronic power steering, speed sensitive." Tesla denies all other allegations in Paragraph 104 of the Amended Complaint.

105. Tesla admits that the Model S Owner's Manual includes sections entitled "car computer." Tesla admits that the Model S Owner's Manual includes the words "[w]hen you open a door to enter Model S, the touchscreen powers on and you can operate all controls. To shift Model S, press the brake pedal and swipe up for Drive or down for Reverse on the touchscreen's drive mode strip (see Shifting)" and "[w]hen you press the brake pedal when parked, the drive mode strip

displays on one side of the touchscreen. Use the drive mode strip to shift Model S: swipe up for Drive, swipe down for Reverse or touch the P for Park or N for Neutral. A chime sounds whenever you shift gears.” Tesla denies all other allegations in Paragraph 105 of the Amended Complaint.

106. Tesla denies the allegations in Paragraph 106 of the Amended Complaint.

107. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that Tesla’s official X account posted “Auto Shift between D & R is available on newer Model S, 3, X, Y” on March 12, 2025. Tesla denies all other allegations in Paragraph 107 of the Amended Complaint.

108. Tesla denies the allegations in Paragraph 108 of the Amended Complaint.

109. Tesla denies the allegations in Paragraph 109 of the Amended Complaint.

110. Tesla denies the allegations in Paragraph 110 of the Amended Complaint

COUNT VI

Inducing Patent Infringement of the ’184 Patent, 35 U.S.C. § 271(b)

111. Tesla’s responses to the above Paragraphs are incorporated as though fully set forth herein.

112. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112 of the Amended Complaint, and therefore denies them.

113. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the ’184 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 113 of the Amended Complaint.

114. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 114 of the Amended Complaint.

115. Tesla denies the allegations in Paragraph 115 of the Amended Complaint.

116. Tesla admits that Tesla makes available to customers Owner's Manuals that include a section entitled "Shifting" that discusses Tesla's proprietary AutoShift feature. Tesla denies all other allegations in Paragraph 116 of the Amended Complaint.

117. Tesla denies the allegations in Paragraph 117 of the Amended Complaint.

118. Tesla denies the allegations in Paragraph 118 of the Amended Complaint.

COUNT VII

Direct Patent Infringement of the '871 Patent, 35 U.S.C. § 271(a)

119. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

120. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120 of the Amended Complaint, and therefore denies them.

121. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 121 of the Amended Complaint.

122. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '871 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 122 of the Amended Complaint.

123. Tesla denies the allegations in Paragraph 123 of the Amended Complaint.

124. Tesla denies the allegations in Paragraph 124 of the Amended Complaint.

125. Tesla denies the allegations in Paragraph 125 of the Amended Complaint.

126. Tesla admits that Paragraph 126 appears to accurately include the language of Claim 1 of the '871 Patent. Tesla denies all other allegations in Paragraph 126 of the Amended Complaint.

127. Tesla denies the allegations in Paragraph 127 of the Amended Complaint.

128. Tesla admits that the Accused Products are motor vehicles, but denies it has infringed any claims of the '871 Patent. Tesla denies all other allegations in Paragraph 128 of the Amended Complaint.

129. Tesla admits that the Accused Products have wheels, but denies it has infringed any claims of the '871 Patent. Tesla denies all other allegations in Paragraph 129 of the Amended Complaint.

130. Tesla admits that the Accused Products have a motor, but denies it has infringed any claims of the '871 Patent. Tesla denies all other allegations in Paragraph 130 of the Amended Complaint.

131. Tesla admits that the Model S Owner's Manual includes the words "variable ratio rack and pinion with electronic power steering, speed sensitive." Tesla denies all other allegations in Paragraph 131 of the Amended Complaint.

132. Tesla admits that the Accused Products include braking systems, but denies it has infringed any claims of the '871 Patent. Tesla denies all other allegations in Paragraph 132 of the Amended Complaint.

133. Tesla admits that the Model S Owner's Manual includes sections entitled "car computer." Tesla denies all other allegations in Paragraph 133 of the Amended Complaint.

134. Tesla admits that the Model S Owner's Manual includes the words "[w]hen you open a door to enter Model S, the touchscreen powers on and you can operate all controls. To shift Model S, press the brake pedal and swipe up for Drive or down for Reverse on the touchscreen's drive mode strip (see Shifting)" and "[w]hen you press the brake pedal when parked, the drive mode strip displays on one side of the touchscreen. Use the drive mode strip to shift Model S: swipe up for Drive, swipe down for Reverse or touch the P for Park or N for Neutral. A chime sounds

whenever you shift gears.” Tesla denies all other allegations in Paragraph 134 of the Amended Complaint.

135. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that Tesla’s official X account posted “Auto Shift between D & R is available on newer Model S, 3, X, Y” on March 12, 2025. Tesla denies all other allegations in Paragraph 135 of the Amended Complaint.

136. Tesla denies the allegations in Paragraph 136 of the Amended Complaint.

137. Tesla denies the allegations in Paragraph 137 of the Amended Complaint.

138. Tesla denies the allegations in Paragraph 138 of the Amended Complaint.

COUNT VIII

Inducing Patent Infringement of the ’871 Patent, 35 U.S.C. § 271(b)

139. Tesla’s responses to the above Paragraphs are incorporated as though fully set forth herein.

140. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140 of the Amended Complaint, and therefore denies them.

141. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the ’871 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 141 of the Amended Complaint.

142. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 142 of the Amended Complaint.

143. Tesla denies the allegations in Paragraph 143 of the Amended Complaint.

144. Tesla admits that Tesla makes available to customers Owner's Manuals that include a section entitled "Shifting" that discusses Tesla's proprietary AutoShift feature. Tesla denies all other allegations in Paragraph 144 of the Amended Complaint.

145. Tesla denies the allegations in Paragraph 145 of the Amended Complaint.

146. Tesla denies the allegations in Paragraph 146 of the Amended Complaint.

COUNT IX

Direct Patent Infringement of the '456 Patent, 35 U.S.C. § 271(a)

147. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

148. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148 of the Amended Complaint, and therefore denies them.

149. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 149 of the Amended Complaint.

150. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '456 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 150 of the Amended Complaint.

151. Tesla denies the allegations in Paragraph 151 of the Amended Complaint.

152. Tesla denies the allegations in Paragraph 152 of the Amended Complaint.

153. Tesla denies the allegations in Paragraph 153 of the Amended Complaint.

154. Tesla admits that Paragraph 154 appears to accurately include the language of Claim 1 of the '456 Patent. Tesla denies all other allegations in Paragraph 154 of the Amended Complaint.

155. Tesla denies the allegations in Paragraph 155 of the Amended Complaint.

156. Tesla admits that the Accused Products are motor vehicles, but denies it has infringed any claims of the '456 Patent. Tesla denies all other allegations in Paragraph 156 of the Amended Complaint.

157. Tesla admits that the Accused Products have wheels, but denies it has infringed any claims of the '456 Patent. Tesla denies all other allegations in Paragraph 157 of the Amended Complaint.

158. Tesla admits that the Accused Products have a motor, but denies it has infringed any claims of the '456 Patent. Tesla denies all other allegations in Paragraph 158 of the Amended Complaint.

159. Tesla admits that the Model S Owner's Manual includes the words "variable ratio rack and pinion with electronic power steering, speed sensitive." Tesla denies all other allegations in Paragraph 159 of the Amended Complaint.

160. Tesla admits that the Model S Owner's Manual includes sections entitled "car computer." Tesla denies all other allegations in Paragraph 160 of the Amended Complaint.

161. Tesla admits that the Model S Owner's Manual includes the words "[w]hen you open a door to enter Model S, the touchscreen powers on and you can operate all controls. To shift Model S, press the brake pedal and swipe up for Drive or down for Reverse on the touchscreen's drive mode strip (see Shifting)" and "[w]hen you press the brake pedal when parked, the drive mode strip displays on one side of the touchscreen. Use the drive mode strip to shift Model S: swipe up for Drive, swipe down for Reverse or touch the P for Park or N for Neutral. A chime sounds whenever you shift gears." Tesla denies all other allegations in Paragraph 161 of the Amended Complaint.

162. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that Tesla’s official X account posted “Auto Shift between D & R is available on newer Model S, 3, X, Y” on March 12, 2025. Tesla denies all other allegations in Paragraph 162 of the Amended Complaint.

163. Tesla denies the allegations in Paragraph 163 of the Amended Complaint.

164. Tesla denies the allegations in Paragraph 164 of the Amended Complaint.

165. Tesla denies the allegations in Paragraph 165 of the Amended Complaint

COUNT X

Inducing Patent Infringement of the ’456 Patent, 35 U.S.C. § 271(b)

166. Tesla’s responses to the above Paragraphs are incorporated as though fully set forth herein.

167. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167 of the Amended Complaint, and therefore denies them.

168. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the ’456 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 168 of the Amended Complaint.

169. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 169 of the Amended Complaint.

170. Tesla denies the allegations in Paragraph 170 of the Amended Complaint.

171. Tesla admits that Tesla makes available to customers Owner’s Manuals that include a section entitled “Shifting” that discusses Tesla’s proprietary AutoShift feature. Tesla denies all other allegations in Paragraph 171 of the Amended Complaint.

172. Tesla denies the allegations in Paragraph 172 of the Amended Complaint.

173. Tesla denies the allegations in Paragraph 173 of the Amended Complaint.

COUNT XI

Direct Patent Infringement of the '457 Patent, 35 U.S.C. § 271(a)

174. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

175. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175 of the Amended Complaint, and therefore denies them.

176. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 176 of the Amended Complaint.

177. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '457 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 177 of the Amended Complaint.

178. Tesla denies the allegations in Paragraph 178 of the Amended Complaint.

179. Tesla denies the allegations in Paragraph 179 of the Amended Complaint.

180. Tesla denies the allegations in Paragraph 180 of the Amended Complaint.

181. Tesla admits that Paragraph 181 appears to accurately include the language of Claim 1 of the '457 Patent. Tesla denies all other allegations in Paragraph 181 of the Amended Complaint.

182. Tesla denies the allegations in Paragraph 182 of the Amended Complaint.

183. Tesla admits that the Accused Products are motor vehicles, but denies it has infringed any claims of the '457 Patent. Tesla denies all other allegations in Paragraph 183 of the Amended Complaint.

184. Tesla admits that the Model S Owner’s Manual includes the words “variable ratio rack and pinion with electronic power steering, speed sensitive.” Tesla denies all other allegations in Paragraph 184 of the Amended Complaint.

185. Tesla admits that the Model S Owner’s Manual includes sections entitled “car computer.” Tesla admits that the Model S Owner’s Manual includes the words “[w]hen you open a door to enter Model S, the touchscreen powers on and you can operate all controls. To shift Model S, press the brake pedal and swipe up for Drive or down for Reverse on the touchscreen's drive mode strip (see Shifting)” and “[w]hen you press the brake pedal when parked, the drive mode strip displays on one side of the touchscreen. Use the drive mode strip to shift Model S: swipe up for Drive, swipe down for Reverse or touch the P for Park or N for Neutral. A chime sounds whenever you shift gears.” Tesla denies all other allegations in Paragraph 185 of the Amended Complaint.

186. Tesla denies the allegations in Paragraph 186 of the Amended Complaint.

187. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that Tesla’s official X account posted “Auto Shift between D & R is available on newer Model S, 3, X, Y” on March 12, 2025. Tesla denies all other allegations in Paragraph 187 of the Amended Complaint.

188. Tesla admits that Tesla’s official X account posted a video with the text “POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot” on March 12, 2025. Tesla admits that the Model S Owner’s Manual includes the words “To override the selection, press the brake pedal and use the drive mode strip on the touchscreen to manually shift into your desired Drive Mode. Once you override, you’ll need to shift gears again for

Auto Shift (Beta) to reappear. If Auto Shift (Beta) is unavailable, the instrument cluster displays a message.” Tesla denies all other allegations in Paragraph 188 of the Amended Complaint.

189. Tesla denies the allegations in Paragraph 189 of the Amended Complaint.

190. Tesla denies the allegations in Paragraph 190 of the Amended Complaint.

191. Tesla denies the allegations in Paragraph 191 of the Amended Complaint.

COUNT XII

Inducing Patent Infringement of the ‘457 Patent, 35 U.S.C. § 271(b)

192. Tesla’s responses to the above Paragraphs are incorporated as though fully set forth herein.

193. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193 of the Amended Complaint, and therefore denies them.

194. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the ‘457 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 194 of the Amended Complaint.

195. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 195 of the Amended Complaint.

196. Tesla denies the allegations in Paragraph 196 of the Amended Complaint.

197. Tesla admits that Tesla makes available to customers Owner’s Manuals that include a section entitled “Shifting” that discusses Tesla’s proprietary AutoShift feature. Tesla denies all other allegations in Paragraph 197 of the Amended Complaint.

198. Tesla denies the allegations in Paragraph 198 of the Amended Complaint.

199. Tesla denies the allegations in Paragraph 199 of the Amended Complaint.

COUNT XIII

Direct Patent Infringement of the '458 Patent, 35 U.S.C. § 271(a)

200. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

201. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201 of the Amended Complaint, and therefore denies them.

202. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 202 of the Amended Complaint.

203. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '458 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 203 of the Amended Complaint.

204. Tesla denies the allegations in Paragraph 204 of the Amended Complaint.

205. Tesla denies the allegations in Paragraph 205 of the Amended Complaint.

206. Tesla denies the allegations in Paragraph 206 of the Amended Complaint.

207. Tesla admits that Paragraph 207 appears to accurately include the language of Claim 1 of the '458 Patent. Tesla denies all other allegations in Paragraph 207 of the Amended Complaint.

208. Tesla denies the allegations in Paragraph 208 of the Amended Complaint.

209. Tesla admits that the Accused Products are motor vehicles, but denies it has infringed any claims of the '458 Patent. Tesla denies all other allegations in Paragraph 209 of the Amended Complaint.

210. Tesla admits that the Accused Products have wheels, but denies it has infringed any claims of the '458 Patent. Tesla denies all other allegations in Paragraph 210 of the Amended Complaint.

211. Tesla admits that the Accused Products have a motor, but denies it has infringed any claims of the '458 Patent. Tesla denies all other allegations in Paragraph 211 of the Amended Complaint.

212. Tesla admits that the Model S Owner's Manual includes the words "variable ratio rack and pinion with electronic power steering, speed sensitive." Tesla denies all other allegations in Paragraph 212 of the Amended Complaint.

213. Tesla admits that the Model S Owner's Manual includes sections entitled "car computer." Tesla denies all other allegations in Paragraph 213 of the Amended Complaint.

214. Tesla admits that the Model S Owner's Manual includes the words "[w]hen you open a door to enter Model S, the touchscreen powers on and you can operate all controls. To shift Model S, press the brake pedal and swipe up for Drive or down for Reverse on the touchscreen's drive mode strip (see Shifting)" and "[w]hen you press the brake pedal when parked, the drive mode strip displays on one side of the touchscreen. Use the drive mode strip to shift Model S: swipe up for Drive, swipe down for Reverse or touch the P for Park or N for Neutral. A chime sounds whenever you shift gears." Tesla denies all other allegations in Paragraph 214 of the Amended Complaint.

215. Tesla admits that Tesla's official X account posted a video with the text "POV your car automatically shifts between Drive & Reverse during 3-point turns or when leaving a parking spot" on March 12, 2025. Tesla admits that Tesla's official X account posted "Auto Shift between D & R is available on newer Model S, 3, X, Y" on March 12, 2025. Tesla denies all other allegations in Paragraph 215 of the Amended Complaint.

216. Tesla denies the allegations in Paragraph 216 of the Amended Complaint.

217. Tesla denies the allegations in Paragraph 217 of the Amended Complaint.

218. Tesla denies the allegations in Paragraph 218 of the Amended Complaint.

COUNT XIV

Inducing Patent Infringement of the '458 Patent, 35 U.S.C. § 271(b)

219. Tesla's responses to the above Paragraphs are incorporated as though fully set forth herein.

220. Tesla is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220 of the Amended Complaint, and therefore denies them.

221. Tesla admits that Tesla does not have a licensing agreement with Plaintiff regarding the '458 Patent, but denies that any such license is necessary. Tesla denies all other allegations in Paragraph 221 of the Amended Complaint.

222. Tesla admits that the original Complaint in this action was filed on May 5, 2025. Tesla denies all other allegations in Paragraph 222 of the Amended Complaint.

223. Tesla denies the allegations in Paragraph 223 of the Amended Complaint.

224. Tesla admits that Tesla makes available to customers Owner's Manuals that include a section entitled "Shifting" that discusses Tesla's proprietary AutoShift feature. Tesla denies all other allegations in Paragraph 224 of the Amended Complaint.

225. Tesla denies the allegations in Paragraph 225 of the Amended Complaint.

226. Tesla denies the allegations in Paragraph 226 of the Amended Complaint.

PRAYER FOR RELIEF

This section of the Amended Complaint sets forth Bulletproof's requested relief, to which no response is required. Tesla denies that Bulletproof is entitled to any relief requested in any of Paragraphs A-F of the Prayer section of the Amended Complaint or otherwise. To the extent any statement in that section is deemed to include any factual allegations, Tesla denies such allegations.

DEMAND FOR JURY TRIAL

This section of the Amended Complaint sets forth Bulletproof's demand for a jury trial, to which no response is required. In accordance with Federal Rule of Civil Procedure 38(b), Tesla similarly demands a trial by jury on all issues so triable.

FIRST DEFENSE

(Noninfringement of the Patents-in-Suit)

Tesla has not directly infringed, indirectly infringed, induced infringement, or contributed to infringement of any valid or enforceable claim of any of the Patents-in-Suit, and Tesla has not otherwise committed acts in violation of 35 U.S.C. § 271 or any other theory of infringement (e.g., the judicially created doctrine of equivalents).

SECOND DEFENSE

(Invalidity)

On information and belief, and subject to further discovery, each of the Patents-in-Suit is invalid for failure to comply with the requirements of 35 U.S.C. §§ 101, 102, 103, and/or 112, or any other applicably statutory provisions of Title 35 of the United States Code, or the rules and regulations of the United States Patent and Trademark Office.

THIRD DEFENSE

(Prosecution History Estoppel)

Bulletproof's claims are barred in whole or in part by reason of estoppel. Bulletproof is estopped from construing any valid claim of the Patents-in-Suit to be infringed or to have been infringed, either literally or by application of the doctrine of equivalents, by any product made, used, imported, sold, or offered for sale by Tesla in view of prior art and/or because of admissions, representations, and/or statements made to the Patent Office during prosecution of any application leading to the issuance of the Patents-in-Suit or any related patents, because disclosure or language

in the specification of any Patent-in-Suit, and/or because of limitations in the claims of the Patents-in-Suit.

FOURTH DEFENSE

(Limitation on Damages)

Bulletproof is barred in whole or in part from recovering damages under 35 U.S.C. §§ 286, 287, and/or 288.

FIFTH DEFENSE

(Limitation on Remedies)

Bulletproof's remedies are limited under 28 U.S.C. § 1498(a). Tesla is not liable to the extent the Accused Products were used or manufactured by or for the United States, or to the extent accused activities were undertaken on behalf of the United States, according to at least 28 U.S.C. § 1498.

SIXTH DEFENSE

(Marking and Notice)

To the extent that Bulletproof and/or any predecessors in interest or any licensees to the Patents-in-Suit failed to properly mark any of their relevant products or materials as required by 35 U.S.C. § 287, or otherwise failed to give proper notice that Tesla's actions allegedly infringe the Patents-in-Suit, Tesla is not liable to Bulletproof for the acts alleged to have been performed before Tesla received actual notice that the Accused Products were allegedly infringing the Patents-in-Suit.

SEVENTH DEFENSE

(Unclean Hands/ Equitable Estoppel/ Acquiescence/ Waiver)

Bulletproof's attempted enforcement of the Patents-in-Suit against Tesla is barred by unclean hands, equitable estoppel, acquiescence, and/or waiver.

EIGHTH DEFENSE

(Ensnarement of Prior Art)

To the extent that Bulletproof alleges that Tesla infringes the Patents-in-Suit by equivalents, Bulletproof's claims for relief are barred, in whole or in part, by ensnaring the prior art.

NINTH DEFENSE

(Statute of Limitations)

To the extent Bulletproof seeks recovery for any alleged infringement committed more than six years prior to filing of the Amended Complaint, such recovery is barred by 35 U.S.C. § 286.

TENTH DEFENSE

(Failure to State a Claim Upon Which Relief May Be Granted)

Bulletproof's Complaint fails to state a claim upon which relief may be granted, including but not limited to because the Patents-in-Suit contain claims that cannot be infringed as made, used, sold, offered for sale, or imported into the United States by Tesla.

ELEVENTH DEFENSE

(Patent Misuse)

Bulletproof's attempted enforcement of the Patents-in-Suit against Tesla is barred based on Bulletproof's attempts to extract royalties beyond the scope of the Patents-in-Suit and Bulletproof's anti-competitive enforcement of the Patents-in-Suit.

TWELFTH DEFENSE

(Laches)

Bulletproof's claims are barred in whole or in part by the doctrine of laches because the applicants of certain Patents-in-Suit unreasonably delayed the prosecution of their patent

applications and because Bulletproof unreasonably delayed in asserting its infringement claims and this delay caused prejudice to Tesla.

THIRTEENTH DEFENSE
(NOT AN EXCEPTIONAL CASE)

Bulletproof is precluded from recovering its reasonable attorneys' fees, costs, and/or increased damages under 35 U.S.C. §§ 284 or 285.

FOURTEENTH DEFENSE
(LACK OF KNOWLEDGE)

To the extent that Bulletproof asserts that Tesla indirectly infringes, either by contributory infringement or inducement of infringement, Tesla is not liable to Plaintiff for the acts alleged to have been performed before Tesla knew that its actions would cause indirect infringement.

FIFTEENTH DEFENSE
(NO WILLFUL INFRINGEMENT)

Bulletproof is not entitled to enhanced damages under 35 U.S.C. § 284 because Tesla has not intentionally, willfully, or deliberately infringed any claim of the Asserted Patents, or engaged in any egregious conduct.

SIXTEENTH DEFENSE
(STANDING)

To the extent that Bulletproof does not own all substantial rights in the Asserted Patents, Bulletproof lacks standing to pursue some or all of its claims against Tesla.

RESERVATION OF ALL AFFIRMATIVE DEFENSES

Tesla hereby gives notice that it intends to rely upon any other matter constituting an avoidance or affirmative defense as set forth in Rule 8(c) of the Federal Rules of Civil Procedure, and that it reserves the right to seek leave to amend this Answer to add to, amend, withdraw, or modify these defenses as its investigation continues and as discovery may require.

Dated: September 30, 2025

Respectfully Submitted,

FISH & RICHARDSON P.C.

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**COUNSEL FOR DEFENDANT,
TESLA, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on September 30, 2025, and it was served via CM/ECF on all counsel of record.

/s/ David M. Hoffman
David M. Hoffman