

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BULLETPROOF PROPERTY
MANAGEMENT LLC,

Plaintiff,

-against-

TESLA, INC.; JOHN DOES Nos. 1–20,
Unknown persons,

Defendants.

Civil Action No. 1:25-cv-00665

JURY TRIAL DEMANDED

CASE READINESS STATUS REPORT

Plaintiff Bulletproof Property Management LLC and Defendant Tesla, Inc., hereby provide the following status report:

SCHEDULE

A scheduling order has not yet been filed.

Markman date: **August 24, 2026** (in accord with the Court’s Exemplary Scheduling Order).

Trial date: **August 23, 2027** (in accord with the Court’s Exemplary Scheduling Order).

FILING AND EXTENSIONS

Plaintiff’s Complaint was filed on May 5, 2025. Plaintiff’s Amended Complaint was filed on August 11, 2025. There has been one extension for a total of 45 days.

RESPONSE TO COMPLAINT

Defendant filed a Motion to Dismiss in response to Plaintiff’s Complaint on July 21, 2025. Defendant filed a Motion to Dismiss in response to Plaintiff’s Amended Complaint on August 25, 2025. Defendant filed an Answer on September 30, 2025. Defendant’s Answer does not include any counterclaims.

PENDING MOTIONS

A Motion to Transfer Venue (Dkt. No. 22) is pending before the Court.

RELATED CASES IN THIS JUDICIAL DISTRICT

There are no related cases in this Judicial District, including any other cases where a common patent is asserted.

IPR, CBM, AND OTHER PGR FILINGS

The following IPRs have been filed on January 20, 2026, and docketed on January 27, 2026: IPR2026-00222, IPR2026-00219, IPR2026-00205, and IPR2026-00204.

The following IPRs have been filed on January 23, 2026, and docketed on January 27, 2026: IPR2026-00229, IPR2026-00228, and IPR2026-00227.

The expected time for institution decisions for all seven IPRs is **July 27, 2026**.

The expected time for final written decisions for all seven IPRs is **July 27, 2027**.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff has asserted seven (7) patents and a total of fifteen (15) claims. The asserted patents are U.S. Patent Nos. 11,932,230; 12,221,104; 12,227,184; 12,233,871; 12,240,456; 12,240,457; 12,240,458.

APPOINTMENT OF TECHNICAL ADVISOR

The parties do not anticipate the need for the appointment of a Technical Advisor.

MEET AND CONFER STATUS

Plaintiff and Defendant met and conferred. The Parties have no pre-Markman issues to raise at the CMC.

Date: March 2, 2026,

Respectfully Submitted,

BUETHER JOE & COUNSELORS, LLC

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By: /s/ Christopher M. Joe.

By: /s/ David M. Hoffman

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

**COUNSEL FOR PLAINTIFF BULLETPROOF
PROPERTY MANAGEMENT LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service and are being served with a copy of this document via the Court's CM/ECF systems on this 2nd day of March 2026.

/s/ Christopher M. Joe
Christopher M. Joe

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Bulletproof Property Management LLC and Defendant Tesla, Inc. conferred about filing this joint report and agreed to the same on this 26th day of February 2026.

/s/ Christopher M. Joe
Christopher M. Joe