

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA MOBILITY LLC, GOOGLE INC. AND APPLE INC.

Petitioners

v.

ARENDI S.A.R.L.
alleged Patent Owner

Case IPR2014-00203

Patent 8,306,993

**CORRECTED PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET. SEQ.***

TABLE OF CONTENTS

NOTICE OF LEAD AND BACKUP COUNSEL	1
NOTICE OF EACH REAL-PARTY-IN-INTEREST.....	1
NOTICE OF RELATED MATTERS.....	1
NOTICE OF SERVICE INFORMATION	1
GROUND FOR STANDING	2
STATEMENT OF PRECISE RELIEF REQUESTED	2
THRESHOLD REQUIREMENT FOR <i>INTER PARTES</i> REVIEW.....	3
I. Introduction.....	3
A. Declaration of Dr. Dennis Allison	3
B. Technical Background.....	3
Overview of the '993 Patent	3
II. State of the Art at the Claimed Priority Date	6
III. Construction of the Claims	7
A. Claims 1, 9, and 17 — "Contact Database"	9
B. Claims 1, 9, and 17 — "Initiating Electronic Communication".....	9
C. Allowing the User to Make a Decision Whether.....	10
D. Claims 6, 14, and 22 — "Input Device".....	10
E. Claims 7, 15, and 23 — "Button"	11
IV. Claim-By-Claim Explanation of Grounds for Unpatentability.....	11
Ground 1. Claims 1-4, 6-12, 14-20, and 22-24 are invalid under 35 U.S.C. § 103 over Bonura in view of Magnanelli.....	11
1. It would have been obvious to combine Bonura with Magnanelli	17
Ground 2. Claims 5, 13 and 21 would have been obvious as in Ground 1, in further view of Giordano.	33
Ground 3. Claims 1-2, 6-7, 9-10, 14-15, 17-18 and 22-23 are invalid under 35 U.S.C. § 102(b) over Luciw.....	35
Ground 4. Claims 1-24 are invalid under 35 U.S.C. § 103 over Luciw in view of Bates and Giordano.	46
1. It would have been obvious to combine Luciw, Bates and Giordano	48

EXHIBIT LIST

Exhibit Number	Exhibit Name
1001	U.S. Patent No. 8,306,993
1002	Declaration of Dennis Allison
1003	U.S. Patent No. 5,644,735
1004	U.S. Patent No. 6,247,043
1005	U.S. Patent No. 6,870,828
1006	"Drop Zones: An Extension to LiveDoc," <i>SigCHI Bulletin</i> , vol. 30 no. 2, April 1998, by Thomas Bonura and James R. Miller
1007	Academia: An Agent-Maintained Database based on Information Extraction from Web Documents, by Mario Magnanelli, Antonia Erni, and Moira Norrie.
1008	Dennis Allison Curriculum Vitae
1009	U.S. Patent No. 5,859,636
1010	U.S. Patent No. 5,644,735
1011	U.S. Patent No. 5,754,306
1012	U.S. Patent No. 5,790,532
1013	U.S. Patent No. 8,306,993 - Claim Language Comparison
1014	"http://developer.apple.com/technotes/tn/tn1005.html" captured and displayed on Archive.org's "Wayback Machine" downloaded by Archive.org from the web on January 17, 1999.
1015	Notice of Service of Summons on Motorola Mobility LLC
1016	"http://ftp.inf.ethz.ch/publications/papers.html" captured and displayed on Archive.org's "Wayback Machine" downloaded by Archive.org from the web on February 10, 1998
1017	<i>Proceedings of 14th European Meeting on Cybernetics and Systems Research</i> on April 15, 1998, (taken from http://www.osgk.ac.at/emcsr/98/).

NOTICE OF LEAD AND BACKUP COUNSEL

Counsel for Petitioners Motorola Mobility LLC and Google Inc.:

Lead Counsel: Matthew A. Smith (Reg. No. 49,003); **Tel:** 650.265.6109

Backup Counsel: Zhuanjia Gu (Reg. No. 51,758); **Tel:** 650 529.4752

Address: Tuner Boyd LLP, 2570 W. El Camino Real Ste. 380,

Mountain View, CA 94040. **FAX:** 650.521.5931.

Counsel for Petitioner Apple Inc.:

Lead Counsel: David L. Fehrman (Reg. No. 28,600); **Tel:** 213.892.5601

Backup Counsel: Mehran Arjomand (Reg. No. 48,231); **Tel:** 213.892.5630

Address: MORRISON & FOERSTER LLP, 707 Wilshire Blvd., Suite 6000, Los

Angeles, CA 90017-3543. **FAX:** .213.892.5454

NOTICE OF EACH REAL-PARTY-IN-INTEREST

The real-parties-in-interest for this Petition are Motorola Mobility LLC for Petitioner Motorola Mobility LLC, Google Inc. for Petitioner Google Inc., and Apple Inc. for Petitioner Apple Inc.

NOTICE OF RELATED MATTERS

U.S. Patent no. 8,306,993 (“the ‘993 patent”) at issue has been asserted in the U.S. District Court for the District of Delaware in the following cases: 1-12-cv-01601, 1-12-cv-01602, 1-12-cv-01600, 1-12-cv-01599, 1-12-cv-01598, 1-12-cv-01596, 1-12-cv-01595, and 1-12-cv-01597, all filed on Nov. 29, 2012.

NOTICE OF SERVICE INFORMATION

Please address all correspondence to the lead counsel at the addresses shown above. Petitioners also consents to electronic service by email at the following addresses: smith@turnerboyd.com, docketing@turnerboyd.com, gu@turnerboyd.com, kent@turnerboyd.com, dfehrman@mofocom.com, marjomand@mofocom.com.

GROUND FOR STANDING

Petitioner hereby **certifies** that the patent for which review is sought is available for *inter partes* review and that the Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in the petition. Motorola Mobility was served with a complaint on November 30, 2012 (*see* Ex. 1015), and this petition is being filed on Dec. 2, 2013 (Monday) by virtue of 35 U.S.C. § 21(b). Apple Inc. was served with a complaint on December 3, 2013.

STATEMENT OF PRECISE RELIEF REQUESTED

The Petitioner respectfully requests that claims 1-24 of U.S. Patent No. 8,306,993 ("the '993 patent") (Ex. 1001) be canceled based on the following grounds of unpatentability, explained in detail in the next section:

Ground 1. Claims 1-4, 6-12, 14-20, and 22-24 are invalid under 35 U.S.C. § 103 over Bonura in view of Magnanelli.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.