

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.
Petitioner

v.

BLACKBERRY LTD.
Patent Owner

Patent No. 8,713,466

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,713,466**

TABLE OF CONTENTS

I. INTRODUCTION 1

II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8 1

III. PAYMENT OF FEES 1

IV. GROUNDS FOR STANDING 2

V. PRECISE RELIEF REQUESTED AND GROUNDS RAISED 2

VI. LEVEL OF ORDINARY SKILL IN THE ART 3

VII. CLAIM CONSTRUCTION 4

VIII. DETAILED EXPLANATION OF GROUNDS 4

 A. Ground 1: *Cadiz* Renders Obvious Claims 1, 4, 6, 12-14, 17, 22, and 24 4

 1. Claim 1 4

 2. Claim 4 31

 3. Claim 6 32

 4. Claim 12 33

 5. Claim 13 35

 6. Claim 14 37

 7. Claim 17 40

 8. Claim 22 40

 9. Claim 24 43

 B. Ground 2: *Cadiz* and *Hawkins* Render Obvious Claims 2, 3, 15, and 23 43

 1. Claim 2 43

Petition for *Inter Partes* Review
Patent No. 8,713,466

2.	Claim 3	47
3.	Claim 15	48
4.	Claim 23	49
C.	Ground 3: <i>Cadiz</i> and <i>Siedlikowski</i> Render Obvious Claims 7-9, 18, 19, and 25	50
1.	Claim 7	50
2.	Claim 8	53
3.	Claim 9	54
4.	Claim 18	56
5.	Claim 19	57
6.	Claim 25	57
D.	Ground 4: <i>Cadiz</i> and <i>Yamadera</i> Render Obvious Claims 5, 10, 11, 16, 20, 21, and 26	58
1.	Claim 5	58
2.	Claim 10	61
3.	Claim 11	66
4.	Claim 16	67
5.	Claim 20	68
6.	Claim 21	68
7.	Claim 26	69
IX.	CONCLUSION.....	70

TABLE OF AUTHORITIES

	Page(s)
Federal Cases	
<i>KSR Int'l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007)	<i>passim</i>
Federal Statutes	
35 U.S.C. § 102(b)	3
35 U.S.C. § 102(e)	3
35 U.S.C. § 103(a)	2
Regulations	
37 C.F.R. § 42.8	1
37 C.F.R. § 42.100(b)	4

LIST OF EXHIBITS

1001	U.S. Patent No. 8,713,466
1002	Declaration of Dr. Dan R. Olsen Jr.
1003	Curriculum Vitae of Dr. Dan R. Olsen Jr.
1004	Prosecution History of U.S. Patent No. 8,713,466
1005	Prosecution History of U.S. Patent No. 8,402,384
1006	U.S. Patent Application Publication No. 2002/0186257 (“ <i>Cadiz</i> ”)
1007	U.S. Patent No. 7,007,239 (“ <i>Hawkins</i> ”)
1008	U.S. Patent No. 6,741,232 (“ <i>Siedlikowski</i> ”)
1009	U.S. Patent Publication No. 2002/0123368 (“ <i>Yamadera</i> ”)
1010	U.S. Patent No. 7,454,714 (“ <i>Totman</i> ”)
1011	European Patent Application No. EP1265157 (“ <i>Cadiz-EP</i> ”)
1012	Caroline Rose <i>et al.</i> , “Inside Macintosh Volume 1” (1985)
1013	“Macintosh Human Interface Guidelines,” Apple Computer, Inc. (1995)
1014	Prosecution History of European Patent Application No. 06125884.4

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.