

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

BLACKBERRY LTD.,
Patent Owner.

Case IPR2017-00914
Patent 8,713,466 B2

PETITIONER'S REPLY

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TABLE OF AUTHORITIES

Page(s)

Federal Cases

In re Fulton,
391 F.3d 1195 (Fed. Cir. 2004)18, 21

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 (“*Cadiz*”)
- 1007 U.S. Patent No. 7,007,239 (“*Hawkins*”)
- 1008 U.S. Patent No. 6,741,232 (“*Siedlikowski*”)
- 1009 U.S. Patent Publication No. 2002/0123368 (“*Yamadera*”)
- 1010 U.S. Patent No. 7,454,714 (“*Totman*”)
- 1011 European Patent Application No. EP1265157 (“*Cadiz-EP*”)
- 1012 Caroline Rose *et al.*, “Inside Macintosh Volume 1” (1985)
- 1013 “Macintosh Human Interface Guidelines,” Apple Computer, Inc. (1995)
- 1014 Prosecution History of European Patent Application No. 06125884.4
- 1015 RESERVED
- 1016 RESERVED
- 1017 RESERVED
- 1018 Deposition Transcript of Dr. George T. Ligler (March 13, 2018)

I. INTRODUCTION

Petitioner replies to Patent Owner's (PO) Response (Paper 17, "Resp.") and the Board's decision to institute *inter partes* review (Paper 7, "Dec.") of the '466 patent. PO's arguments should be rejected and claims 1-26 of the '466 patent found unpatentable for at least the reasons set forth in the Petition (Paper 1, "Pet.") and accompanying exhibits, and the additional reasons provided below.

II. CLAIM CONSTRUCTION

PO argues that the limitation "additional dynamic preview information comprising a selectable link," as recited in claims 1, 14, and 22, requires (i) "the 'additional dynamic preview information' to be preview information that is dynamic" and (ii) "the 'selectable link' to include such dynamic preview information." (Resp., 12 (emphasis omitted).) As it did in its Institution Decision (Dec., 5-10), the Board should reject PO's construction because it is inconsistent with the claim language, specification, and prosecution history, and cannot be reconciled with the testimony of PO's expert regarding this limitation. Moreover, PO's proposed construction is irrelevant because the Petition demonstrates that this limitation would have been obvious even under PO's construction.

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