Paper No. 17

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

BLACKBERRY LTD.,
Patent Owner.

Case No. IPR 2017-00914
U.S. Patent No. 8,713,466

PATENT OWNER'S RESPONSE

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

I. Introduction....1

II. The '466 Patent....1

A. Overview of the '466 Patent....1

B. Priority Date and Relevant Prosecution History....4

i. The '384 Patent's Prosecution History....5

ii. The '466 Patent's Prosecution History....9

C. Person of Ordinary Skill in the Art....10

III. Claim Construction....11

A. "Additional Dynamic Preview Information Comprising a Selectable Link" (All Claims)....12

IV. The Challenged Claims Are Not Obvious In View Of Cadiz's Person-Centric Interface or Email-Centric Interface....24

A. The Challenged Claims Are Not Obvious In View of Cadiz's Person-Centric Interface....24

i. Cadiz's Person-Centric Interface Does Not Disclose or Render Obvious The Claimed "Software Application"....24

ii. Cadiz's Person-Centric Interface Does Not Disclose or Render Obvious "Additional Dynamic Preview Information Comprising A Selectable Link"....32

B. The Challenged Claims Are Not Obvious In View Of Cadiz's Email-Centric Interface....37

i. Cadiz's Email-Centric Interface Does Not Disclose or Render Obvious "A Selectable Link" that "Invokes the Software Application"....37

DOCKET ALARM Find authenticated court documents without watermarks at docketalarm.com.

V. Cadiz In View Of Siedlikowski Does Not Render Obvious Claims 7-9, 18-19, or 25 40

VI. Cadiz In View Of Yamadera Does Not Render Obvious Claims 10-11 or 20-21 45

VII. Reservation of Rights 49

VIII. Conclusion 50

DOCKET ALARM Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF AUTHORITIES

Page(s)

Cases

Adv. Cardiovascular Sys., Inc. v. Medtronic Vascular, Inc.,
182 F. App'x 994 (Fed. Cir. 2006) 16

D'Agostino v. MasterCard Int'l Inc.,
844 F.3d 945 (Fed. Cir. 2016) 13, 16, 21

Ex parte Gundrum,
Appeal No. 2015-7620.....39, 49

Microsoft Corp. v. Proxyconn, Inc.,
789 F.3d 1292 (Fed. Cir. 2015), *overruled on other grounds, Aqua Products, Inc. v. Matal*, 872 F.3d 1290 (Fed. Cir. 2017) (en banc) 11, 12, 16

Oil States Energy Services, LLC v. Greene's Energy Group, LLC,
No. 2015-1855, 639 F. App'x 639 (Fed. Cir. May 4, 2016), *cert. granted*, No. 16-712 (U.S. June 12, 2017) 49

PPC Broadband, Inc. v. Corning Optical Commc'ns RF,
815 F.3d 747 (Fed. Cir. 2016) 23

Tempo Lighting Inc. v. Tivoli LLC,
742 F.3d 973 (Fed. Cir. 2014) 12

Statutes

35 U.S.C. § 316(e) 1

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

EXHIBIT LIST

No.	Exhibit Description
2001	U.S. Patent App. Pub. No. 2006/0020904 A1 to Aaltonen et al.
2002	U.S. Patent App. Pub. No. 2004/0155908 A1 to Wagner
2003	U.S. Patent No. 8,402,384 B2 to Scott
2004	[RESERVED]
2005	The American Heritage College Dictionary (4th Ed. 2004) (Excerpt)
2006	Declaration of Sharon Lee
2007	Declaration of Dr. George Ligler
2008	CV of Dr. George Ligler
2009	Deposition Transcript of Dr. Daniel R. Olsen, Jr. (Nov. 21, 2017)

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.