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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner

v.

GEOGRAPHIC LOCATION INNOVATIONS, LLC
Patent Owner

IPR2017-02022
Patent 7,917,285

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT 7,917,285

TABLE OF CONTENTS

I. INTRODUCTION

Petitioner Unified Patents Inc. ("Petitioner") respectfully requests an *inter partes* review ("IPR") of claims 1, 2, 5-7, 9, and 13-18 (collectively, the "Challenged Claims") of U.S. Patent 7,917,285 ("the '285 Patent").

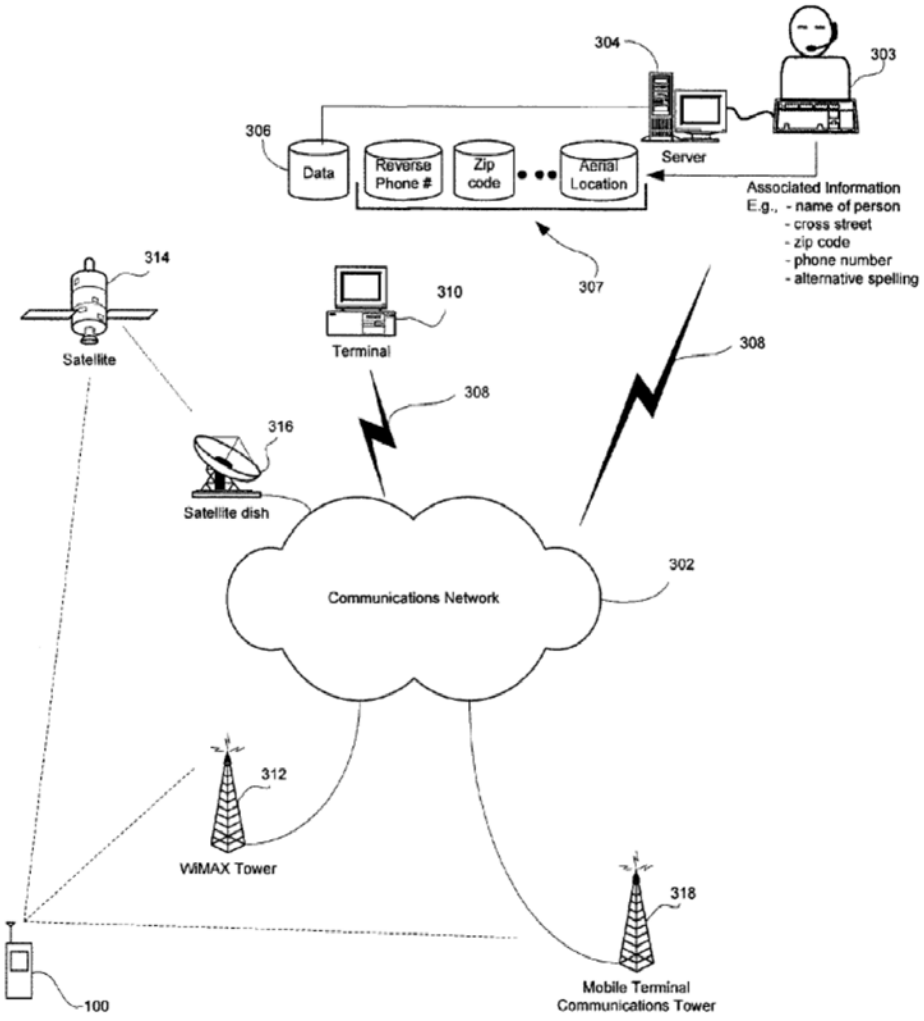
II. SUMMARY OF THE '285 PATENT

A. Description of the alleged invention of the '285 Patent

The '285 Patent purports to address problems associated with requiring users to manually program locations into conventional GPS devices. *'285 Patent* (EX1001), at 1:15-2:13. To do so, the '285 Patent proposes devices, systems, and methods for remotely entering location addresses into a user's GPS device to automatically program it with destinations for route guidance. *Id.* at Abstract, 2:25-30, 3:53-67.

The system includes a GPS device 100, which may be "any type of navigation or positional information device including but not limited to a vehicle-mounted device, a GPS receiver coupled to a desktop computer or laptop, etc." *Id.* at 4:1-8. The GPS device determines its location using a location information module, "employing conventional location information processing technology," such as "GPS," "Loran," or "any other available locational technology." *Id.* at 5:5-11. The GPS device also includes "a communication module 112 for transmitting stored data to another device, e.g., a personal computer, a personal digital assistant (PDA), a server residing on the Internet, etc."

As shown in the figure below, the GPS device 100 communicates via a communications network 302 with a remote customer service center (CSC) having a live operator 303 that has access to a server 304 for looking up address information and for transmitting information to the GPS device:



Id. at Fig. 3, 9:13-20; *see also id.* at 8:13-16. The communications network may be a telematics network that, for example, enables data and voice communications using "any known communication means," such as RF, satellite, CDMA, 3G, and

more. *Id.* at 8:13-16. The system can also include a local computer 310 coupled to the communications network 302. *Id.* at 9:64-10:33. The user may remotely request entry of an address into the GPS device 100 for purposes of the GPS device providing route guidance to the address.

When the user requests remote entry of an address into GPS device 100, the user is connected to the customer service center (CSC) via analog or digital communications or any other type of communication link. *Id*. at 8:62-9:3. The vehicle or device is identified using an identifier, such as a cellular phone number or IP address, which can be transmitted to the CSC or detected using conventional techniques, such as using caller ID and a database lookup. *Id*. at 9:3-12. The request for the address may be received by voice communications as the user communicates with a live operator 303 who inputs the request into the server 304 or the request may be directly received electronically by the server. *Id.* at 9:17-39. The live operator accesses the server 304 to look-up the requested location information. *Id.* For example, the user may provide the name and city of a desired location, which the operator uses to look-up the address and/or latitude/longitude coordinates of the location. *Id.* at 12:12-52. The determined address or coordinate information is then transmitted to the device 100, which uses it to generate route guidance to the location. *Id.*

In certain embodiments, the user can also request location information using

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