

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOMTOM, INC.,  
Petitioner,

v.

BLACKBIRD TECH LLC d/b/a BLACKBIRD TECHNOLOGIES,  
Patent Owner.

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Case IPR2017-02023  
Patent 6,434,212

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**PATENT OWNER BLACKBIRD TECHNOLOGIES'  
RESPONSE**

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