

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOMTOM, INC.,
Petitioner,

v.

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

Case IPR2017-02025
Patent 6,434,212

**PATENT OWNER BLACKBIRD TECHNOLOGIES'
PRELIMINARY RESPONSE**

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