### UNITED STATES PATENT AND TRADEMARK OFFICE

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## BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FACEBOOK, INC., INSTAGRAM, LLC, and WHATSAPP INC., *Petitioners*,

v.

BLACKBERRY LIMITED,

Patent Owner

IPR2019-00528 U.S. Patent No. 8,279,173

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PATENT OWNER'S RESPONSE



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Alloc, Inc. v. Int'l Trade Commc'n, 342 F.3d 1361 (Fed. Cir. 2003)	41
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<i>In re Nuvasive, Inc.</i> , 842 F.3d 1376 (Fed. Cir. 2016)	64
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SAS Institute, Inc. v. Iancu, 138 S. Ct. 1348 (2018)	45
Sinorgchem Co., Shandong v. Int'l Trade Comm'n, 511 F 3d 113 (Fed Cir 2007)	23



## **LIST OF EXHIBITS**

Exhibit #	Description
2001	Declaration of Rajeev Surati, Ph.D.
2002	Excerpts from the American Heritage College Dictionary, 4th ed. (2002)
2003	Excerpts from Webster's New World College Dictionary, 4th ed. (2008)
2004	Excerpts from Merriam-Webster's Collegiate Dictionary, 11th ed. (2003)
2005	Exhibit 9 from the Deposition of Sandeep Chatterjee, Ph.D.
2006	Petitioners' Opposition to BlackBerry's Motion for Partial Summary Judgment of Infringement in the District Court Litigation
2007	Intentionally Omitted
2008	Prosecution History of U.S. Patent No. 9,495,335
2009	U.S. Patent Application No. 13/252,807
2010	U.S. Patent Application No. 11/746,285
2011	Redline comparison of '807 and '285 Applications
2012	Transcript of November 7, 2019 Deposition of Sandeep Chatterjee, Ph.D.



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