

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 James R. Asperger (Bar No. 83188)  
3 jamesasperger@quinnemanuel.com  
4 865 S. Figueroa St., 10th Floor  
5 Los Angeles, CA 90017  
6 Telephone: (213) 443-3000  
7 Facsimile: (213) 443-3100

8 Kevin P.B. Johnson (Bar No. 177129)  
9 kevinjohnson@quinnemanuel.com  
10 Victoria F. Maroulis (Bar No. 202603)  
11 victoriamaroulis@quinnemanuel.com  
12 555 Twin Dolphin Drive, 5th Floor  
13 Redwood Shores, CA 94065  
14 Telephone: (650) 801-5000  
15 Facsimile: (650) 801-5100

16 BLACKBERRY CORPORATION  
17 Edward R. McGah, Jr (SBN 97719)  
18 Vice President, Deputy General Counsel – Litigation  
19 41 Ticknor Place  
20 Laguna Niguel, California 92677  
21 Telephone: (+1) 650-581-4750

22 Attorneys for BlackBerry Limited

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BLACKBERRY LIMITED, a )  
Canadian corporation, )  
Plaintiff, )  
v. ) CASE NO. 2:18-cv-02693  
SNAP INC., a Delaware corporation ) **COMPLAINT FOR PATENT**  
Defendant. ) **INFRINGEMENT**  
**JURY TRIAL DEMANDED**

1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff BlackBerry Limited (“BlackBerry” or “Plaintiff”) hereby asserts the  
3 following claims for patent infringement against Defendant Snap Inc. (“Snap” or  
4 “Defendant”), and alleges as follows:

5 **SUMMARY**

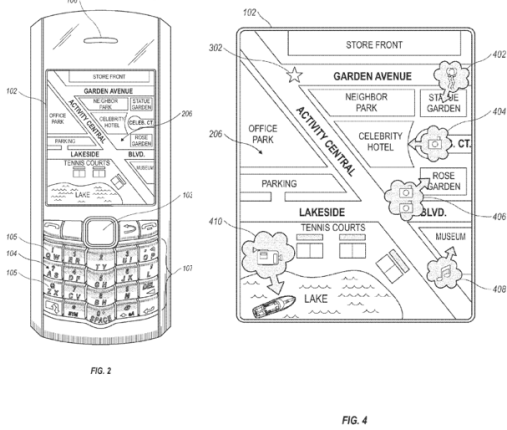
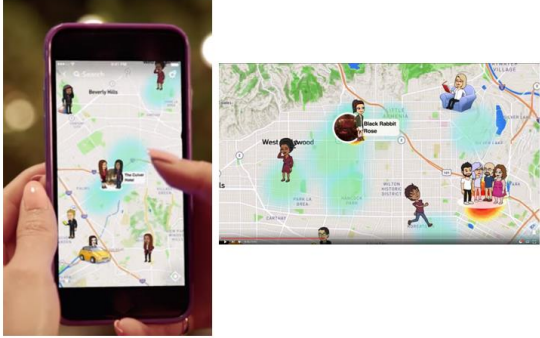
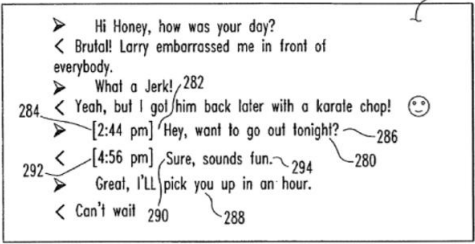
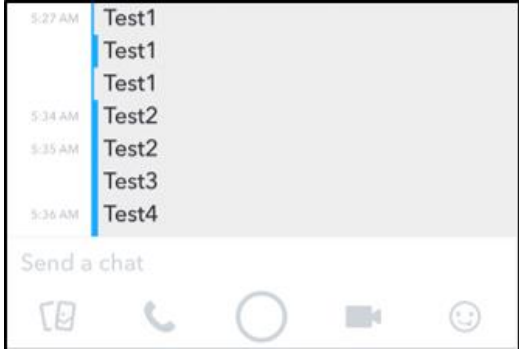
6 1. ***BlackBerry Pioneers Mobile Messaging*** - BlackBerry has been a  
7 leading innovator in the field of mobile communications for the past 30 years,  
8 having invested substantial sums into research and development of communications  
9 technologies. BlackBerry’s innovations led to the commercialization of some of the  
10 earliest models of smartphones in the United States, enabling its users to, among  
11 other things, send and receive e-mails securely and surf the internet anytime and  
12 anywhere. These same innovations prompted the rise of the smartphone as a  
13 necessary everyday accessory for businesspersons and ordinary consumers alike.

14 2. One example of BlackBerry’s innovations is the BlackBerry Messenger  
15 technology, which revolutionized instant messaging by providing users with secure,  
16 user-friendly, point-to-point instant messaging on their mobile devices. In many  
17 respects, through BlackBerry Messenger and other research and development,  
18 BlackBerry helped pioneer modern mobile messaging—secure, instant and user  
19 friendly on a mobile device. The appeal and success of BlackBerry Messenger led  
20 consumers to consider instant messaging functionality as an integral aspect of  
21 mobile communications, resulting today in billions of people worldwide engaging in  
22 instant messaging over their mobile device.

23 3. As an innovator, BlackBerry took many steps to safeguard this valuable  
24 intellectual property. It received numerous patents protecting the cutting-edge  
25 features of its mobile phones, BlackBerry Messenger, and other communications  
26 applications that make such products secure, easy-to-use, and ultimately engaging to  
27 the end-user, thereby driving user growth and retention.

28

1 4. Defendant has used BlackBerry's intellectual property to compete with  
 2 it in the mobile messaging space. A summary of Snap's infringing activities is  
 3 presented below:

BlackBerry's Innovations	Snap
<p data-bbox="375 531 854 583"><b>BlackBerry's U.S. Patent Nos. 8,825,084 and 8,326,327</b> Originally Filed 2010</p>  <p data-bbox="456 942 480 957">FIG. 2</p> <p data-bbox="708 993 732 1008">FIG. 4</p>	<p data-bbox="1117 510 1317 552"><b>"Introducing Snap Map"</b> June 21, 2017</p> 
<p data-bbox="435 1083 769 1129"><b>BlackBerry's U.S. Patent No. 8,301,713</b> Originally Filed 2003</p>  <p data-bbox="565 1398 651 1430">FIG. 8a</p>	

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**BlackBerry's U.S. Patent No. 8,209,634**  
Originally Filed 2003

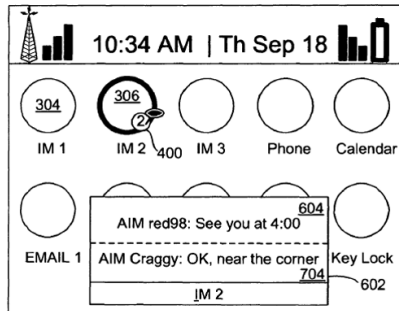
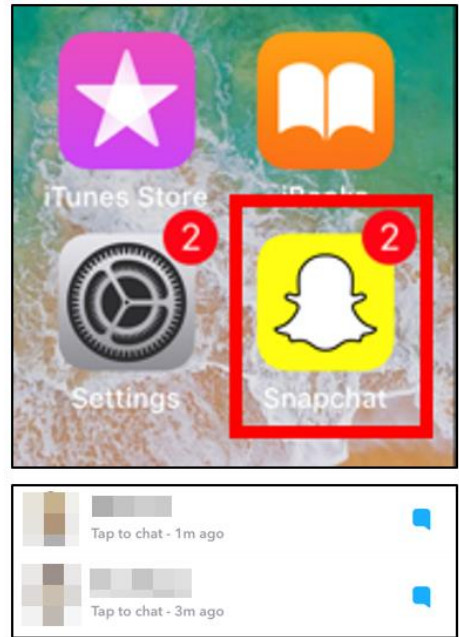


FIG. 7



**BlackBerry's U.S. Patent Nos. 8,296,351 and 8,676,929**  
Originally Filed 2001

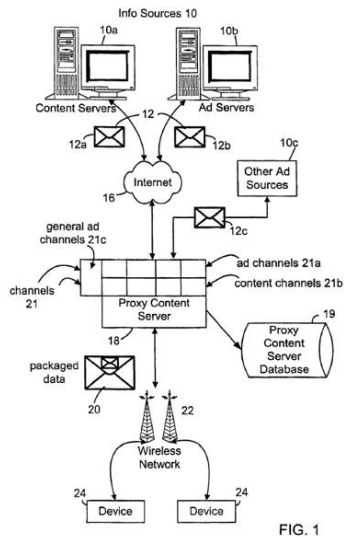


FIG. 1

**Snap Ads**

**The Creative Solution: Snap Ads**

Clean & Clear partnered with Snapchat to run animated Snap Ads that reached the right people at the right time. Clean & Clear used Snapchat's Lifestyle Categories to optimize its Snap Ads between Stories campaign and reach Snapchatters more likely to be interested in beauty. The bright, happy creative featured the Morning Burst face wash, encouraging Snapchatters to "Wake up tired skin."

Snapchatters were encouraged to "Wake up Tired Skin" with Morning Burst

5. The Patents-in-Suit cover, for example:
- (a) *Map Improvements For Mobile Devices*—improved mapping techniques to establish and maintain real time activity location information and provide

1 sufficient indication for user adoption;

2 (b) *User Interface Improvements For Mobile Devices*—including (i)  
3 improvements in message notification techniques that streamline and  
4 optimize reception of new message notifications, and (ii) display of  
5 timestamps in a messaging user interface that provides users with appropriate  
6 temporal context for their communications without overtaking the user’s  
7 screen with unnecessary information; and

8 (c) *Modern Mobile Advertising Techniques*—methods for integrating  
9 advertising on mobile devices using different static and dynamic advertising  
10 content as well as time sensitive advertising.

11 6. *Defendant’s Use of BlackBerry’s Mobile Messaging Innovations*  
12 *Harms BlackBerry and Provides Undeserved Windfall to Snap*—Defendant’s use  
13 of BlackBerry’s inventions and infringement of the Patents-in-Suit have succeeded  
14 in diverting consumers away from BlackBerry’s products and services and toward  
15 those of Defendant. This infringement has resulted in a substantial and undeserved  
16 windfall for Defendant as these users drive Defendant’s revenue. Defendant’s gain  
17 comes at BlackBerry’s expense, depriving BlackBerry of revenue to which it is  
18 entitled as a result of its inventions.

19 7. BlackBerry attempted to resolve this dispute without resorting to  
20 litigation. It has been communicating with Defendant for over a year regarding its  
21 patent portfolio, including various letters, calls and an in person meeting. Through  
22 this suit, BlackBerry seeks redress for the harm caused by Defendant’s unlawful use  
23 of BlackBerry’s intellectual property.

24 **INTRODUCTION TO BLACKBERRY**

25 8. For more than 30 years, BlackBerry has been a leading innovator in the  
26 mobile communications industry. BlackBerry’s cutting-edge wireless  
27 communication products and services have transformed the way people around the  
28 world connect, converse, and share digital information.

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