UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SNAP, INC., Petitioner

v.

BLACKBERRY LIMITED, Patent Owner

Case No. IPR2019-00714 Patent No. 8,825,084

PATENT OWNER'S RESPONSE

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		1.	The Petition's inconsistent mapping of Winkler to Claims 1 and 9 deprive Patent Owner and the Board of a fair opportunity to assess Petitioner's combination and ignore all requirements for "the at least one action spot"				
		2.	The Petition fails to show that any individual map element disclosed in the Winkler-Altman combination is an action spot corresponding to "a location where at least one second mobile device has engaged in at least one documenting action"				
		3.	The Petition fails to show that the Winkler-Altman system sets a "predetermined distance" before determining "the at least one action spot"				
	B.	The Petition's Proposed Modification To Winkler's System Is Factually And Legally Flawed					
		1.	The Petition fails to address how/why a POSITA would have combined Winkler's distinct embodiments to achieve one map element that would provide all requirements of the claimed "action spot"				
		2.	The Petition's Winkler-Altman combination conflates distances from a map element with distances from a current location of a first mobile device				

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LIST OF EXHIBITS

EX2001	Declaration of Patrick McDaniel, Ph.D.
EX2002	Corrected Final Ruling on Claim Construction/ <i>Markman</i> Hearing, <i>Blackberry Limited v. Snap Inc.</i> , Case Nos. CV 18- 1844-GW & 18-2693-GW (C.D. Cal. April 5, 2019) (" <i>Markman</i> Order")
EX2003	Second Declaration of Patrick McDaniel, Ph.D.
EX2004	Transcript of Deposition of Dr. Samrat Bhattacharjee (November 18, 2019)
EX2005-EX2007	[RESERVED]
EX2008	Garmin: Updating Maps on Your Garmin Device (May 2010), <i>available at</i> https://www8.garmin.com/documents/instructions/ Garmin_Map_Update_Guide.pdf (retrieved November 24, 2019)
EX2009	CNET Article: How To Update Your GPS Maps TomTom Edition (July 14, 2010), <i>available at</i> https://www.cnet.com/ pictures/how-to-update-your-gps-maps-tomtom-edition-photos (retrieved November 24, 2019) (slideshow pictures reproduced in a single PDF)

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