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Filed on behalf of: Snap Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SNAP INC.,
Petitioner

v.

BLACKBERRY LIMITED
Patent Owner

Case No. IPR2019-00715
U.S. Patent No. 8,326,327

PETITIONER'S REPLY



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I.	Intro	oduction1
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III.	Grou Wink	and 1: Response arguments rely on mischaracterization of stler and the Petition
	A.	Patent Owner mischaracterizes <i>Winkler</i> 's disclosure as presenting distinct embodiments and ignores <i>Winkler</i> 's teaching that features may be used in tandem
	В.	Patent Owner's assertion that Petitioner does not explain how a single map element may comprise an action spot mischaracterizes the Petition and relies on an incomplete understanding of <i>Winkler</i>
	C.	Winkler's method for dynamically modifying map elements teaches map elements that can be a claimed "action spot"
	D.	The Petition describes how and why a POSITA would have been motivated to combine <i>Winkler</i> and <i>Altman</i>
IV.		ands 2-4: The Response relies on mischaracterizations of the rences, Petition, and '327 patent22
	A.	The Response imports limitations into the claimed "activity level" and <i>Lemmela</i> 's disclosure
	В.	Patent Owner imports new limitations into the claimed "graphical item identifying a direction" and creates distinctions unsupported by the '327 patent or instituted grounds
	C.	A POSITA would have been motivated to combine <i>Lemmela</i> and <i>Crowley</i> (ground 2), <i>Lemmela</i> , <i>Crowley</i> , and <i>Winkler</i> (ground 3), and <i>Lemmela</i> , <i>Crowley</i> , and <i>Waldman</i> (ground 4)27
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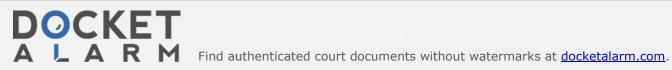


LIST OF EXHIBITS

No.	Description
1001	U.S. Patent No. 8,326,327
1002	Declaration of Dr. Samrat Bhattacharjee
1003	CV of Dr. Samrat Bhattacharjee
1004	U.S. Patent No. 8,750,906 ("Winkler")
1005	U.S. Patent Application Publication 2008/0250337 ("Lemmela")
1006	U.S. Patent Application Publication 2007/0281716 ("Altman")
1007	File History of U.S. Patent No. 8,326,327
1008	U.S. Patent No. 7,593,740 ("Crowley")
1009	RESERVED
1010	Complaint for Patent Infringement, Case No. 2:18-cv-02693, CD CA
1011	U.S. Patent Application Publication 2011/0199479 ("Waldman")
1012	Declaration of Chad J. Peterman
1013	U.S. Patent No. 9,507,778 ("Jaffe")
1014	U.S. Patent No. 10,454,995 to Eyal et al. ("Eyal")
1015	Nokia 770 Internet Tablet with Linux. May 25, 2005. https://www.gsmarena.com/nokia_770_internet_tablet_with_linux-news-124.php
1016	2005 Nokia N770 Internet Overview and Unboxing (PalmOS Linux Device). August 31, 2016. https://www.youtube.com/watch?v=HIB9p7-MsdQ
1017	Star Trek meets Linux on Nokia 770 LCARS PADD. October 22, 2006. https://www.youtube.com/watch?v=YwXBPjLdJnU
1018	RESERVED



1019	RESERVED
1017	RESERVED
1020	Rebuttal Declaration of Dr. Samrat Bhattacharjee
1021	Getting your location with Maps: iPhone and iPod Touch Essential Training from lynda.com. June 24, 2010. https://www.youtube.com/watch?time_continue=31&v=RVjYSAakpmY
	&feature=emb_title.
1022	Transcript of Deposition of Patrick McDaniel, <i>Blackberry Limited v. Snap Inc.</i> , Case Nos. CV 18-2693-GW (C.D. Cal. February 5, 2019)
1023	Declaration of Patrick McDaniel Regarding Claim Construction, Case Nos. CV 18-2693-GW (C.D. Cal. January 17, 2019)
1024	Transcript of Deposition of Patrick McDaniel, IPR2019-00714 and IPR2019-00715 (March 6, 2020)
1025	Federal Communications Commission, Fourteenth Report (May 10, 2010)
1026	Joint Claim Construction and Prehearing Statement, <i>Blackberry Limited</i> v. <i>Snap Inc.</i> , Case Nos. CV 18-1844-GW & 18-2693-GW (C.D. Cal. February 14, 2019)



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