UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
FACEBOOK, INC., INSTAGRAM, LLC, and WHATSAPP INC. Petitioners
V.
BLACKBERRY LIMITED, Patent Owner
Case IPR2019-00925 Patent 8,209,634

PATENT OWNER'S SUR-REPLY



Case IPR2019-00925 Attorney Docket No: 21828-0048IP1

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1.	PETITIONER'S ALLEGED MOTIVATION TO COMBINE (ELEMENT 1[a])
	A. Petitioner ignores its burden to expressly articulate the motivation for modifying Ording's computer hardware to store "the e-mail program of Abiko"
	B. The Reply belatedly attempts to recast its original purported motivations for incorporating "wireless capability" (Preamble) or modifying Ording's "icon" display (Element 1[c]) into a distinct showing for modifying Ording's computer to store/execute the "e-mail program of Abiko" (Element 1[a])
	C. Even if the purported motivation to "automatically display messages by sender" was tethered to the Petition's modification proposed in Element 1[a] (which it was not), it fails to satisfy Petitioner's burden
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EXHIBITS

EX2001	Declaration of Rajeev Surati, Ph.D.
EX2002	Corrected Final Ruling on Claim Construction/Markman Hearing, BlackBerry Limited v. Snap Inc., Case Nos. CV 18-1844-GW & 18-2693-GW (C.D. Cal. April 5, 2019) ("Markman Order")
EX2003	Defendant's Notice and Motion to Stay Pending <i>Inter Partes</i> Review, <i>BlackBerry Limited v. Facebook, Inc. et al.</i> , Case Nos. 2:18-cv-01844-GW & 2:18-cv-02693-GW (C.D. Cal. April 16, 2019)
EX2004	Minutes of Status Conference, Initial Thoughts re Joint Report, <i>BlackBerry Limited v. Facebook, Inc. et al.</i> , Case Nos. 2:18-cv-01844-GW & 2:18-cv-02693-GW (C.D. Cal. April 22, 2019)
EX2005	Notice Withdrawing Pre-Institution Motion to Stay In View of Court's Guidance, <i>BlackBerry Limited v. Facebook, Inc. et al.</i> , Case Nos. 2:18-cv-01844-GW & 2:18-cv-02693-GW (C.D. Cal. April 26, 2019)
EX2006	Minutes of Order In Chambers, Trial Schedule, <i>BlackBerry Limited v. Facebook, Inc. et al.</i> , Case Nos. 2:18-cv-01844-GW & 2:18-cv-02693-GW (C.D. Cal. May 15, 2019)
EX2007	BlackBerry Limited's Final Election of Asserted Claims, BlackBerry Limited v. Facebook, Inc. et al., Case Nos. 2:18-cv-01844-GW & 2:18-cv-02693-GW (C.D. Cal. May 31, 2019)
EX2008	Defendant's Final Election of Asserted Prior Art, <i>BlackBerry Limited v. Facebook, Inc. et al.</i> , Case Nos. 2:18-cv-01844-GW & 2:18-cv-02693-GW (C.D. Cal. June 14, 2019)
EX2009	RESERVED
EX2010	RESERVED



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EX2011	Order Modifying Scheduling Order <i>BlackBerry Limited v. Facebook, Inc. et al.</i> , Case Nos. 2:18-cv-01844-GW & 2:18-cv-02693-GW (C.D. Cal. July 12, 2019)
EX2012	Order Denying Renewed Motion for Stay, The California Institute of Technology v. Broadcom Ltd. et al., Case No. 2:16- cv-03714-GW (C.D. Cal. October 5, 2017)
EX2013	Second Declaration of Rajeev Surati, Ph.D.
EX2014	Apple iMac User's Guide (2002)
EX2015	Chapter 3 of Crumlish (missing from EX110)
EX2016	Chapter 20 of McPherson (missing from EX1112)
EX2017	Transcript of Deposition of Dr. Sandeep Chatterjee (February 5, 2020)
EX2018	Transcript of Deposition of Dr. Sandeep Chatterjee (May 8, 2020)



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