

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner

v.

MAXELL, LTD.
Patent Owner

Case No. IPR2020-00408
U.S. Patent No. 6,430,498

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,430,498**

TABLE OF CONTENTS

I. INTRODUCTION	1
II. SUMMARY OF THE '498 PATENT	1
A. DESCRIPTION OF THE ALLEGED INVENTION OF THE '498 PATENT	1
B. SUMMARY OF THE PROSECUTION HISTORY OF THE '498 PATENT	3
C. LEVEL OF SKILL OF A PERSON HAVING ORDINARY SKILL IN THE ART	5
III. REQUIREMENTS FOR INTER PARTES REVIEW UNDER 37 C.F.R.	
§ 42.104	5
A. GROUNDS FOR STANDING UNDER 37 C.F.R. § 42.104(A).....	5
B. IDENTIFICATION OF CHALLENGE UNDER 37 C.F.R. § 42.104(B) AND RELIEF REQUESTED.....	5
C. THE BOARD'S DISCRETION UNDER § 314(A).....	7
D. CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.104(B)(3)	10
IV. THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS OF THE '498 PATENT ARE UNPATENTABLE	15
A. <u>GROUND 1</u> : <i>HAYASHIDA</i> IN VIEW OF THE KNOWLEDGE OF A PHOSITA RENDERS CLAIMS 1, 3, 5, AND 7-8 OBVIOUS	15
B. <u>GROUND 2</u> : <i>HAYASHIDA</i> IN VIEW OF THE KNOWLEDGE OF A PHOSITA IN FURTHER VIEW OF <i>IKEDA</i> RENDERS CLAIMS 3 AND 7 OBVIOUS	38
C. <u>GROUND 3</u> : <i>HAYASHIDA</i> AND <i>ABOWD</i> RENDER CLAIMS 1, 3-5, 7-11, AND 13 OBVIOUS	42
D. <u>GROUND 4</u> : <i>HAYASHIDA</i> , <i>ABOWD</i> , AND <i>IKEDA</i> RENDER CLAIMS 3, 7, 11, AND 13 OBVIOUS	63
V. CONCLUSION	66
VI. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1)	67
A. REAL PARTY-IN-INTEREST	67
B. RELATED MATTERS	67
C. LEAD AND BACK-UP COUNSEL	67

I. INTRODUCTION

Petitioner Apple Inc. (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1, 3-5, 7-11, and 13 (collectively, the “Challenged Claims”) of U.S. Patent No. 6,430,498 (“the ’498 Patent”). *’498 Patent* (Ex. 1001).

II. SUMMARY OF THE ’498 PATENT

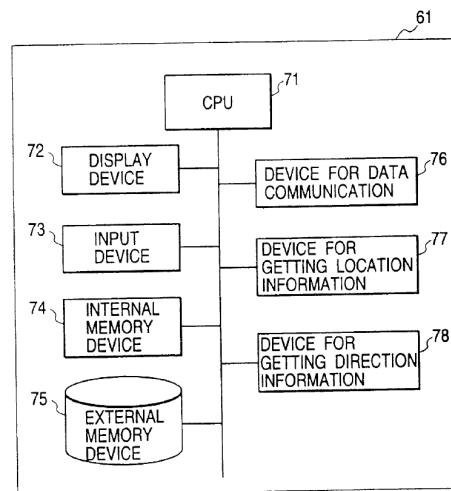
A. Description of the alleged invention of the ’498 Patent

The ’498 Patent generally describes “a portable terminal provided with the function of walking navigation, which can supply location-related information to the walking user.” *’498 Patent* (Ex. 1001), 1:10-13. According to the ’498 Patent, conventional navigation systems at the time of the invention were unsuitable for walking navigation because they were too large to be carried by a walking user, while maps provided by conventional map information services could not be displayed clearly on the small screens of portable telephones. *Id.* at 1:25-32; 1:40-46. The ’498 Patent purports to address these problems by providing a portable terminal that can “supply location information easier for the user to understand during walking.” *Id.* at 2:47-48.

The ’498 Patent describes a “portable terminal . . . with the function of walking navigation [that] is provided with data communication, input, and display devices just like those of ordinary portable telephones and PHS [Personal Handyphone System] terminals, as well as a device for getting location information and a device for getting direction information denoting the user’s present place.” *Id.*

at 2:56–62. Figure 10 of the '498 Patent depicts the primary components of the described portable device:

FIG. 10



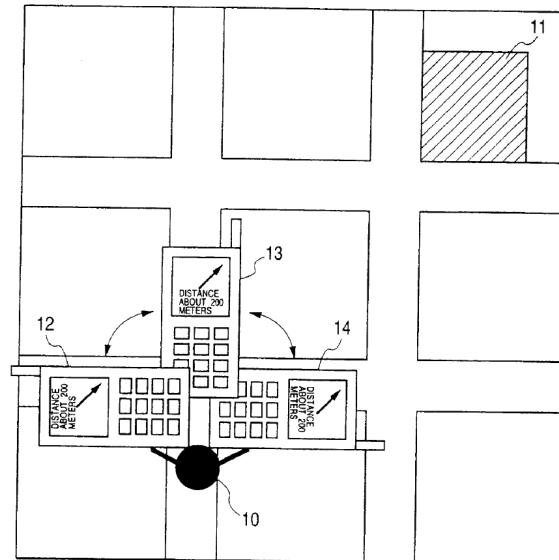
Id. at Fig. 10.

The portable terminal obtains location information and orientation information of the terminal from, for example, “device for getting location information” 77 and “device for getting direction information” 78 as depicted above.

Id. at Abstract, 2:60-65, 9:28-51. Based on this information, the portable terminal obtains and displays information such as route guidance for reaching a destination, which in some circumstances may be the location of another portable terminal. *Id.* at Abstract, 2:66-3:35; 8:33-36; Fig. 5. In one embodiment, the direction of a destination is indicated with an orientation of a line that always points in the

direction of the destination. *Id.* at Abstract. Figure 1, below, illustrates this direction-indicating line that adjusts as the device is rotated:

FIG. 1



Id. at Fig. 1; *see also id.* at Figs 3(a) and 3(b) (showing other displays).

B. Summary of the prosecution history of the '498 Patent

The Application that resulted in the '498 Patent was filed on July 11, 2000 as US App. No. 09/613,634 and claims priority to Japanese Patent 11-197010, which was filed July 12, 1999. '498 Patent (Ex. 1001). For purposes of this proceeding, Petitioner applies July 12, 1999 as the priority date for the Challenged Claims.

On June 27, 2001, the Examiner rejected all claims of the application that resulted in the '498 Patent under 35 U.S.C. Section 102(b) as anticipated by U.S. Patent No. 5,146,231 to Ghaem et al. ("Ghaem"). '498 Patent File History (Ex.

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