

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC
Petitioner

v.

NavBlazer, LLC
Patent Owner

Case No. IPR2021-00502
U.S. Patent No. 9,075,136

**PETITION FOR *INTER PARTES* REVIEW
OF U. S. PATENT NO. 9,075,136**

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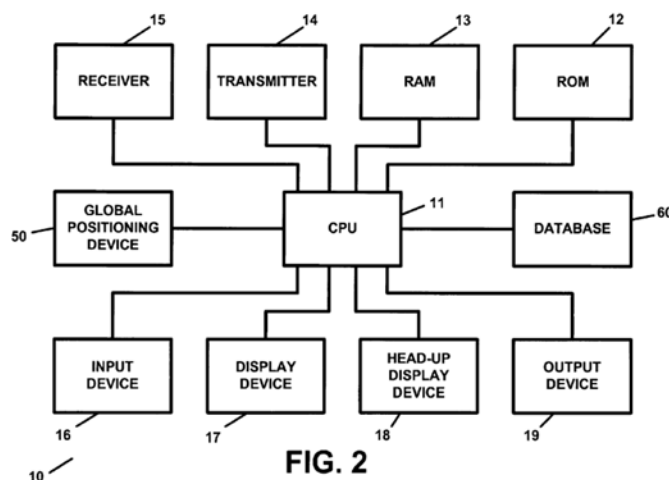
I. INTRODUCTION

Petitioner Google LLC (“Petitioner”) requests *Inter Partes* Review (“IPR”) of claims 23, 24, 35-44, 48, 51-54 (the “Challenged Claims”) of U.S. Patent No. 9,075,136 (“the ’136 Patent”).

II. SUMMARY OF THE ’136 PATENT

A. Description of the ’136 Patent’s Alleged Invention

The ’136 Patent generally relates to providing information to a user in a vehicle, including route guidance and pertinent travel information such as current weather, maintenance services, and traffic. ’136 Patent (Ex. 1001), 1:14-20, 5:20-22, 16:15-18. As illustrated below in Fig. 2, the ’136 Patent describes an apparatus 10 that includes standard computing components (*e.g.*, CPU 11, ROM 12, RAM 13, input device 16, display device 17, heads-up display 18, output device 19, and database 60), means by which information can be communicated to and from the apparatus (*e.g.*, receiver 15 and transmitter 14), and a global positioning device 50:



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Id. at Fig. 2, 8:60-67 (describing apparatus 10). Users interact with apparatus 10 via user input device 16, which can include a keypad and a pointing device, such as a mouse, a roll ball, or a touch pad. *Id.* at 9:18-20. Alternatively, a microphone coupled with voice recognition software allows users to interact with apparatus 10 in a hands-free mode. *Id.* at 18:14-18. Information is output via a display device 17, a head up display device 18, or a speaker. *Id.* at 9:26-34, 18:14-28.

Database 60 stores information about roadways, points of interest near roadways, and other location-based information. *Id.* at 9:66-10:11. When the operator selects a destination, the system can assist in selecting the “most optimal or the least congested route to [the] destination.” *Id.* at 16:36-37. The vehicle computer 10 can also detect when the operator deviates from the planned route and will recompute a new route to the destination. *Id.* at 18:64-19:4. A second embodiment relies on a central processing computer 20 to compute travel routes. *Id.* at 19:13-18.

The '136 Patent generally relates to providing users with information pertinent to travel. For example, apparatus 10 communicates wirelessly with external “central processing computer(s) 20” using available wireless data communications infrastructure such as telephone communications systems, personal communication services (PCS) systems, and satellite communication systems. *Id.* at 7:36-58. With this wireless connectivity, apparatus 10 can obtain “information regarding traffic conditions, weather conditions..., and any other useful information or news regarding

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the selected location which may be of interest to the vehicle operator or occupant.” *Id.* at 16:5-10. *See also, Braasch Decl.* (Ex. 1003), ¶¶ 24-31.

B. The '136 Patent's Prosecution

The Application that resulted in the '136 Patent was filed on March 1, 1999 as U.S. App. No. 09/259,957, claiming priority to a provisional application No. 60/076,800 filed on March 4, 1998. '136 Patent (Ex. 1001). For purposes of this proceeding, Petitioner applies March 4, 1998 as the priority date for the Challenged Claims, but reserves its right to challenge priority in this or other proceedings.

The '136 Patent did not issue until July 7, 2015—sixteen years after the application was filed. *Id.* From 1999 through 2011, the Examiner issued eight prior art-based office actions, including one that was affirmed on appeal, and a first Notice of Allowance issued on February 10, 2011. *Excerpts of the '136 Patent File History* (Ex. 1002), at 172-75, 256-61, 307-11, 344-49, 418-22, 490-93, 978-90, 1053-65, 1074-81. Following this first Notice of Allowance, a total of nine additional Notices of Allowance issued before the '136 Patent ultimately issued on July 7, 2015. *Id.* at 1153-76, 1182-94, 1364-78, 1387-1403, 1413-29, 1562-78, 1638-54, 1754-70, 1821-35. The claims were never again subject to a prior art-based office action. Instead, the Examiner repeatedly accepted claim amendments and new claims, each time issuing a “statement of reasons for allowance” that simply recited the full text of the independent claims. *Id.* at 1153-76, 1182-94, 1364-78, 1387-1403, 1413-29, 1562-78, 1638-54, 1754-70, 1821-

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