UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC Petitioner

v.

NavBlazer, LLC Patent Owner

Case No. IPR2021-00503 U.S. Patent No. 9,075,136

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

DOCKET

TABLE OF CONTENTS

I.	INTI	RODUCTION1
II.	SUM	IMARY OF THE '136 PATENT1
	А.	Description of the '136 Patent's Alleged Invention1
	B.	The '136 Patent's Prosecution
	C.	A Person Having Ordinary Skill in the Art4
III.		UIREMENTS FOR <i>INTER PARTES</i> REVIEW UNDER 37 C.F.R. 104
	А.	Grounds for Standing Under 37 C.F.R. § 42,104(a)
	B.	Discretionary Considerations – 35 U.S.C. § 314(a)
		<i>i</i> . Parallel Petition
	C.	Identification of challenge under 37 C.F.R. § 42,104(b) and relief requested
	D.	Claim construction under 37 C.F.R. § 42.104(b)(3)7
IV.	THE	CHALLENGED CLAIMS ARE UNPATENTABLE
	А.	Brief Overview of the Prior Art
		<i>i. Behr</i> 9
		<i>ii. Schreder</i> 11
		<i>iii. Suman</i> 13
		<i>iv.</i> Hanchett
	B.	Grounds 2-416
		<i>i</i> . Ground 2: <i>Schreder</i> in view of the knowledge of a PHOSITA renders obvious claims 55, 56, 60-62, 69-71, 75-77, 82, 86, 89, 91, 93-95, and 98
		<i>ii.</i> Ground 3: <i>Schreder</i> in view of <i>Behr</i> renders obvious claims 63, 66, 78, 79, 85, 96, and 97
		<i>iii.</i> Ground 4: <i>Schreder</i> in view of <i>Suman</i> renders obvious claims 64, 67, 80, 87, and 88
	C.	Grounds 6-8
V.	CON	ICLUSION

TABLE OF CONTENTS

(continued)

VI.	MAI	NDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(1)	48
	А.	37 C.F.R. § 42.8(b)(1): Real Parties-In-Interest	48
	B.	37 C.F.R. § 42.8(b)(2): Related Matters	48
	C.	37 C.F.R. § 42.8(b)(3), (4): Lead And Back-Up Counsel And	
		Service Information	49

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

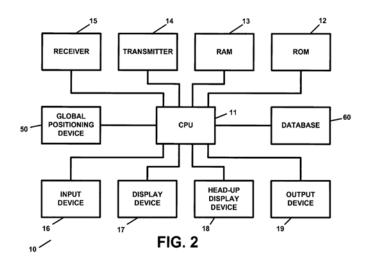
I. INTRODUCTION

Petitioner Google LLC ("Petitioner") requests *Inter Partes* Review ("IPR") of claims 55, 56, 60-64, 66, 67, 69-71, 75-80, 82, 85-89, 91, and 93-98 (the "Challenged Claims") of U.S. Patent No. 9,075,136 ("the '136 Patent").

II. SUMMARY OF THE '136 PATENT

A. <u>Description of the '136 Patent's Alleged Invention</u>

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:



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

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

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.