### 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

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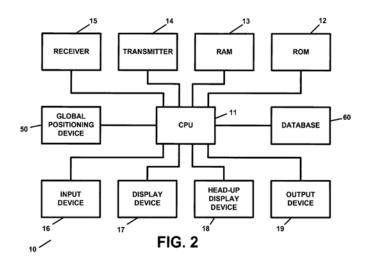
### I. INTRODUCTION

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:



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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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