UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC
Petitioner

v.

NavBlazer, LLC
Patent Owner

Case No. IPR2021-00504
U.S. Patent No. 9,885,782

PETITION FOR *INTER PARTES* REVIEW OF U. S. PATENT NO. 9,885,782

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I. INTRODUCTION

Petitioner Google LLC ("Petitioner") requests an *Inter Partes* Review ("IPR") of claims 1, 2, 5-12, 14-17, and 19 (the "Challenged Claims") of U.S. Patent No. 9,885,782 ("the '782 Patent").

II. SUMMARY OF THE '782 PATENT

A. Description of the '782 Patent's Alleged Invention

The '782 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. *'782* Patent (Ex. 1001), 1:22-28, 5:39-41, 16:56-59. As illustrated below in Fig. 2, the '728 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 device 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:

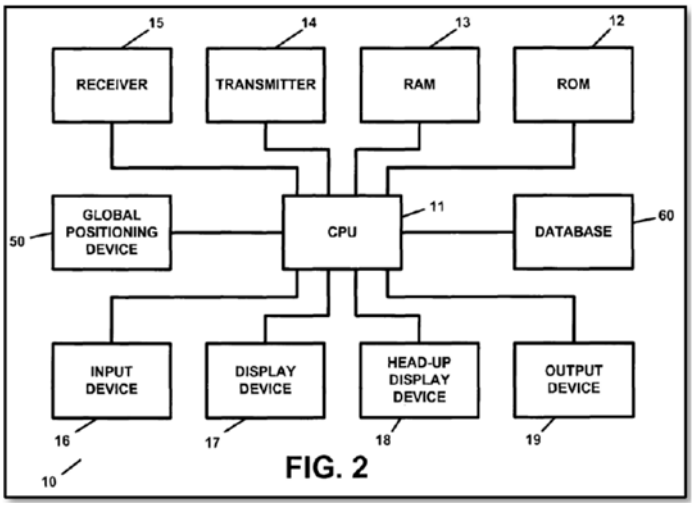

FIG. 2

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Id. at Fig. 2, 9:13-20 (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 9:39-46. Alternatively, a microphone coupled with voice recognition software allows users to interact with apparatus 10 in a hands-free mode. *Id.* at 18:62-66. Information is output via a display device 17, a head up display device 18, or a speaker. *Id.* at 9:47-61, 18:66-19:9.

Database 60 stores information about roadways, points of interest near roadways, and other location-based information. *Id.* at 10:30-38. 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 17:9-12. The vehicle computer 10 can also detect when the operator deviates from the planned route and will re-compute a new route to the destination. *Id.* at 19:46-53.

The '782 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 communication systems, personal communication services (PCS) systems, and satellite communication systems. *'782 Patent* (Ex. 1001), 7:57-8:11. With this wireless connectivity, apparatus 10 can obtain "information regarding traffic conditions, weather conditions…, and any other useful information or news regarding the selected location which may be of interest to the vehicle operator or

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