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Filed on behalf of Apple Inc.

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**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC.,

Petitioner

v.

BILLJCO LLC,

Patent Owner

IPR2022-00310

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 9,088,868  
CHALLENGING CLAIMS 1, 2, 5, 20, 24, 25, 28, and 43  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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## I. INTRODUCTION

Apple Inc. (“Apple” or “Petitioner”) hereby petitions for *inter partes* review of U.S. Patent No. 9,088,868 (“’868 patent”) (EX1001). The ’868 patent describes location-based services for mobile data processing systems and location-based exchanges of data between distributed mobile data processing systems. As shown below, the techniques described in the ’868 patent were known in the prior art.

## II. MANDATORY NOTICES

### A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that Apple is the real party-in-interest, and further certifies that no other party exercised control or could exercise control over the filing of this petition or Apple’s participation in any proceeding instituted on this petition.

### B. Related Matters

According to assignment records at the United States Patent and Trademark Office, the ’868 patent is currently owned by BillJCo LLC (“BillJCo”). The ’868 patent is asserted in the matter *BillJCo v. Apple Inc.*, 6:21-cv-00528 (WDTX).

### C. Counsel

Lead Counsel: Larissa S. Bifano (Reg. No. 59,051)

Backup Counsel: Jonathan Hicks (Reg. No. 75,195)

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