Filed on behalf of: Cellco Partnership d/b/a Verizon Wireless

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
Petitioner

v.

AGIS SOFTWARE DEVELOPMENT LLC
Patent Owner

IPR2023-00056
U.S. Patent No. 8,213,970

PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,213,970

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VII. THE '970 PATENT IS NOT ENTITLED TO AN EFFECTIVE FILING DATE EARLIER THAN NOVEMBER 26, 2008 19

VIII. GROUND 1: CLAIMS 2 AND 10-13 ARE OBVIOUS OVER KUBALA, HAMMOND, AND EMIGH 22

A. Claim 2 28

1. [2.preamble] *A communication system for transmitting, receiving, confirming receipt, and responding to an electronic message, comprising:* 28

2. [2.a] *a predetermined network of participants, wherein each participant has a similarly equipped PDA/cell phone that includes a CPU and a touch screen display a CPU and memory;* 29

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3. [2.b] *a data transmission means that facilitates the transmission of electronic files between said PDA/cell phones in different locations;* 30

4. [2.c] *a sender PDA/cell phone and at least one recipient PDA/cell phone for each electronic message;* 32

5. [2.d] *a forced message alert software application program including a list of required possible responses to be selected by a participant recipient of a forced message response loaded on each participating PDA/cell phone;*.....32

6. [2.e] *means for attaching a forced message alert software packet to a voice or text message creating a forced message alert that is transmitted by said sender PDA/cell phone to the recipient PDA/cell phone, said forced message alert software packet containing a list of possible required responses and requiring the forced message alert software on said recipient PDA/cell phone to transmit an automatic acknowledgment to the sender PDA/cell phone as soon as said forced message alert is received by the recipient PDA/cell phone;* 34

7. [2.f] *means for requiring a required manual response from the response list by the recipient in order to clear recipient's response list from recipient's cell phone display;*.....37

8. [2.g] *means for receiving and displaying a listing of which recipient PDA/cell phones have automatically acknowledged the forced message alert and which recipient PDA/cell phones have not automatically acknowledged the forced message alert;* 39

9. [2.h] *means for periodically resending said forced message alert to said recipient PDA/cell phones that have not automatically acknowledged the forced message alert; and*.....42

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10. [2.i] *means for receiving and displaying a listing of which recipient PDA/cell phones have transmitted a manual response to said forced message alert and details the response from each recipient PDA/cell phone that responded; and*.....44

11. [2.j] *means for displaying a geographical map with georeferenced entities on the display of the sender PDA/cell phone;* 48

12. [2.k] *means for obtaining location and status data associated with the recipient PDA/cell phone; and*.....50

13. [2.l] *means for presenting a recipient symbol on the geographical map corresponding to a correct geographical location of the recipient PDA/cell phone,* 51

14. [2.m] *wherein the forced message alert software application program on the recipient PDA/cell phone includes: means for transmitting the acknowledgment of receipt to said sender PDA/cell phone immediately upon receiving a forced message alert from the sender PDA/cell phone;* 53

15. [2.n] *means for controlling of the recipient PDA/cell phone upon transmitting said automatic acknowledgment and causing, in cases where the force message alert is a text message, the text message and a response list to be shown on the display of the recipient PDA/cell phone or causes, in cases where the forced message alert is a voice message, the voice message being periodically repeated by the speakers of the recipient PDA/cell phone while said response list is shown on the display;* 54

16. [2.o] *means for allowing a manual response to be manually selected from the response list or manually recorded and transmitting said manual response to the sender PDA/cell phone; and* 57

17. [2.p] *means for clearing the text message and a response list from the display of the recipient PDA/cell phone or*

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