

# EXHIBIT 25

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.

MAXELL, LTD.  
Patent Owner

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Case No. IPR2020-00409  
U.S. Patent No. 6,580,999

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 6,580,999**

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## I. INTRODUCTION

Petitioner Apple Inc. (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1-6 (collectively, the “Challenged Claims”) of U.S. Patent No. 6,580,999 (“the ’999 Patent”). ’999 Patent (Ex. 1001).

## II. SUMMARY OF THE ’999 PATENT

### A. Description of the alleged invention of the ’999 Patent

The ’999 Patent generally describes “a portable terminal provided with the function of walking navigation, which can supply location-related information to the walking user.” ’999 Patent (Ex. 1001), 1:14-16. According to the ’999 patent, conventional navigation systems at the time of the invention were unsuitable for walking navigation because they were too large to be carried by a walking user, while maps provided by conventional map information services could not be displayed clearly on the small screens of portable telephones. *Id.* at 1:29–36; 1:44–50. The invention of the ’999 patent purportedly addressed these problems by providing a portable terminal that can “supply location information easier for the user to understand during walking.” *Id.* at 2:49–50.

The ’999 Patent describes a “portable terminal . . . with the function of walking navigation [that] is provided with data communication, input, and display devices just like those of ordinary portable telephones and PHS [Personal Handyphone System] terminals, as well as a device for getting location information and a device for getting direction information denoting the user’s present place.” *Id.*

Accordingly, *Hayashida* as modified by *Abowd* renders obvious a central processor including a CPU and a gyroscope and a compass that perform the claimed function of getting direction information denoting the orientation of the portable terminal.

***[1(c)] a device for getting the location information of another portable terminal, wherein***

As discussed above in Section III(D)(3), the corresponding structure for this limitation is “a CPU and a device for data communication 76 of a portable terminal; or equivalents thereof.” Under Patent Owner’s proposed claim construction, *Hayashida* and *Abowd* teach a CPU 2, and data transmitter/receiver 27, for getting a location information of another portable terminal from said another terminal via connected network. *Kotzin Decl.* (Ex. 1003), ¶¶ 106-108; *see also id.* at ¶¶ 89-92 (discussing reasons to combine *Hayashida* and *Abowd*).

*Abowd* teaches a Messenger (Communications Component) that sends and receives information via a set of wireless communication services. *Abowd* (Ex. 1005), 423-24. *Abowd* teaches that one use for these wireless communication services is to get location information of another portable terminal via connected network. *See id.* (“In order to find out where other tourists are located, each tourist can communicate her current location to some central service that others can access”). *Abowd* notes the importance of communications between users. *Id.* at 421 (“As the prototypes of Cyberguide evolve, we have been able to handle more of the

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