

# EXHIBIT 27

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. IPR2020-00407  
U.S. Patent No. 6,748,317

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 6,748,317**

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## I. INTRODUCTION

Petitioner Apple Inc. (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1-3, 5, 10-15, 17, and 18 (collectively, the “Challenged Claims”) of U.S. Patent No. 6,748,317 (“the ’317 Patent”).

## II. SUMMARY OF THE ’317 PATENT

### A. Description of the alleged invention of the ’317 Patent

The ’317 Patent generally describes “a portable terminal provided with the function of walking navigation, which can supply location-related information to the walking user.” ’317 Patent (Ex. 1001), 1:16–18. According to the ’317 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 1:31–38; 1:46–52. The ’317 Patent purports to address these problems by providing a portable terminal that can “supply location information easier for the user to understand during walking.” *Id.* at 2:53–54.

The ’317 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.*

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For both “a device for getting a location information of another portable terminal from said another terminal via connected network” and “a device for retrieving a route from said present place to said destination,” Patent Owner has identified the device for data communication 76 as the proposed structure. *Opening Claim Construction Brief*, (Ex. 1012), 28-29. In support, Patent Owner identified the following disclosures in the ’317 Patent in support of this corresponding structure: Abstract, 1:10-15, 2:23-26, 2:51-3:1, 3:43-66, 4:14-39, 5:17- 21, 5:64-6:4, 6:9-18, 8:17-9:39, 9:40-63, 10:29-34, Figures 5-7, 9, 10. *Joint Claim Construction and Prehearing Statement*, (Ex. 1011), 8, 10.

As Patent Owner has asserted in the parallel litigation, the Board should adopt “a CPU and a device for data communication 76 of a portable terminal; or equivalents thereof” is the structure performing the claimed functions of getting location information of another portable terminal from said another terminal via connected network and retrieving a route from said present place to said destination. *Opening Claim Construction Brief*, (Ex. 1012), 28.

**IV. THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS OF THE ’317 PATENT ARE UNPATENTABLE**

**A. Ground 1: Hayashida in view of the Knowledge of a PHOSITA renders claims 1-3, 5, 15, and 17 obvious**

**Overview of the Prior Art**

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