

DOCKET NO: 500290US

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BLACKBERRY CORP.,  
Petitioner,

v.

OPTIS WIRELESS TECHNOLOGY, LLC,  
Patent Owner.

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Case IPR2017-\_\_\_\_\_  
Patent No. 8,064,919

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PETITION FOR INTER PARTES REVIEW

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## I. INTRODUCTION

BlackBerry Corp. (“BlackBerry” or “Petitioner”), in accordance with 35 U.S.C. §§ 311–19 and 37 C.F.R. §§ 42.100 *et seq.*, respectfully requests *inter partes* review of claims 1–18 of U.S. Patent No. 8,064,919 (“the ’919 patent”) (Ex. 1001) assigned to Optis Wireless Technology, LLC (“Patent Owner”) via assignment record at Reel/Frame: 032326/0707. This Petition shows by at least a preponderance of the evidence that there is a reasonable likelihood that Petitioner will prevail on proving that claims 1–18 of the ’919 patent are unpatentable based on prior art that the Office did not have before it or did not fully consider during prosecution.

## II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8

Pursuant to 37 C.F.R. § 42.8(a)(1), Petitioner provides the following mandatory disclosures:

### A. Real Party In Interest Under 37 C.F.R. § 42.8(b)(1)

Petitioner certifies that BlackBerry Corp. and BlackBerry Limited are the real parties-in-interest.

### B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

The ’919 patent is asserted in at least one currently pending litigation, which was filed on January 17, 2016 and captioned *PanOptis Patent Management, LLC v. BlackBerry Limited*, No. 2:16-cv-00062-JRG-RSP (E. D. Tex.).

**C. Lead and Back-up Counsel Under 37 C.F.R. § 42.8(b)(3)**

Petitioner provides the following designation of counsel: Lead counsel is Robert C. Mattson (Reg. No. 42,850) and back-up counsel is Sameer Gokhale (Reg. No. 62,618) and Thomas C. Yebernetsky (Reg. No. 70,418).

**D. Service Information Under 37 C.F.R. § 42.8(b)(4)**

Papers concerning this matter should be served in accordance with the following:

Email: cpdocketmattson@oblon.com; cpdocketgokhale@oblon.com; and cpdocketyebernetsky@oblon.com.

Post: Oblon LLP, 1940 Duke Street, Alexandria, VA 22314

Telephone: (703) 412-6466

Fax: (703) 413-2220

Petitioner consents to electronic service at the above email addresses.

**III. PAYMENT OF FEES**

The undersigned authorizes the Office to charge the fee required by 37 C.F.R. § 42.15(a) for this Petition for *inter partes* review to Deposit Account No. 15-0030. Any additional fees that might be due are also authorized.

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