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Filed on behalf of Apple Inc.
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#### UNITED STATES PATENT AND TRADEMARK OFFICE

#### **BEFORE THE PATENT TRIAL AND APPEAL BOARD**

APPLE INC.,

Petitioner

v.

#### BILLJCO LLC,

Patent Owner

IPR2022-00129

#### PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,566,839 CHALLENGING CLAIMS 1–3, 8, 20, 21, 23–27, 32, 44, 45, 47, AND 48 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. 8,566,839 ("'839 patent") (EX1001). The '839 patent describes one or more mobile systems ("MS") that are configured to receive an object for configuring the MS to determine a trigger event and, based on recognizing the trigger event, cause the MS to automatically present information. As shown below, the techniques described in the '839 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 '839 patent is currently owned by BillJCo LLC ("BillJCo"). The '839 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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