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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

IPR2022-00131

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,639,267
CHALLENGING CLAIMS 1, 5, 13, 20, 21, 29, 30, 34, 42, AND 49
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	MANDATORY NOTICES	1
	A. Real Party-in-Interest	1
	B. Related Matters.....	1
	C. Counsel	1
	D. Service Information, Email, Hand Delivery, and Postal.....	2
III.	CERTIFICATION OF GROUNDS FOR STANDING	2
IV.	OVERVIEW OF CHALLENGE AND RELIEF REQUESTED.....	2
	A. Prior Art Patents and Printed Publications.....	2
	B. Grounds for Challenge	4
V.	OVERVIEW OF THE '267 PATENT	4
	A. Summary of the Alleged Invention	4
	B. Level of Ordinary Skill in the Art.....	5
	C. Prosecution History	5
VI.	CLAIM CONSTRUCTION	7
VII.	SPECIFIC GROUNDS FOR PETITION	7
	A. Ground 1: Claims 1, 5, 13, 20, 21, 29, 30, 34, 42, and 49 are obvious over Haberman	7
	1. Overview of Haberman.....	7
	2. Claims 1 and 29 are obvious over Haberman.....	9
	3. Claims 5 and 34 are obvious over Haberman.....	27
	4. Claims 13 and 42 are obvious over Haberman.....	29
	5. Claims 20 and 49 are obvious over Haberman.....	30
	6. Claims 21 and 30 are obvious over Haberman.....	32
	B. Ground 2: Claims 1, 5, 13, 20, 21, 29, 30, 34, 42, and 49 are obvious over Haberman and Boger.....	33

1.	Overview of Boger.....	33
2.	Claims 1 and 29 are obvious over Haberman and Boger	33
3.	Claims 5 and 34 are obvious over Haberman and Boger	39
4.	Claims 13 and 42 are obvious over Haberman and Boger	39
5.	Claims 20 and 49 are obvious over Haberman and Boger	41
6.	Claims 21 and 30 are obvious over Haberman and Boger	42
C.	Ground 3: Claims 1, 5, 13, 20, 21, 29, 30, 34, 42, and 49 are obvious over Vanluijt	42
1.	Overview of Vanluijt	43
2.	Claims 1 and 29 are obvious over Vanluijt.....	44
3.	Claims 5 and 34 are obvious over Vanluijt.....	57
4.	Claims 13 and 42 are obvious over Vanluijt	58
5.	Claims 20 and 49 are obvious over Vanluijt	60
6.	Claims 21 and 30 are obvious over Vanluijt	63
VIII.	DISCRETIONARY DENIAL IS NOT APPROPRIATE	64
A.	<i>General Plastic</i> Denial is Inappropriate.....	64
B.	<i>Fintiv</i> Discretionary Denial is Inappropriate.....	65
1.	<i>Fintiv</i> Factor 1: Institution Will Enable a Stay	65
2.	<i>Fintiv</i> Factor 2: District Court Schedule.....	66
3.	<i>Fintiv</i> Factor 3: Parallel Proceeding Considerations	68
4.	<i>Fintiv</i> Factor 4: The Petition Raises Unique Issues.....	69
5.	<i>Fintiv</i> Factor 5: The Petition Will Enable Cancellation of Claims that Might Be Reasserted.....	69
6.	<i>Fintiv</i> Factor 6: Other Considerations Support Institution	70
IX.	CONCLUSION.....	70

I. INTRODUCTION

Apple Inc. (“Apple” or “Petitioner”) petitions for *inter partes* review of U.S. Patent No. 8,639,267 (“’267 patent”) (EX1001). The ’267 patent describes one or more mobile systems (“MS”) that are configured to receive whereabouts data, where, based on preferences set by the user, the whereabouts data may cause the MS to present information to a user. As shown below, the techniques described in the ’267 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 ’267 patent is currently owned by BillJCo LLC (“BillJCo”). The ’267 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: Joseph Wolfe (Reg. No. 73,173)

Backup Counsel: Jonathan Hicks (Reg. No. 75,195)

D. Service Information, Email, Hand Delivery, and Postal

Apple consents to electronic service at DLA-Apple-BillJCoIPRs@dlapiper.com.

Petitioner can be reached at DLA Piper LLP (US), 33 Arch Street, 26th Floor, Boston, Massachusetts 02110, Phone: 617-406-6000, Fax: 617-406-6100.

III. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review, and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

IV. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to Rules 42.22(a)(1) and 42.104(1)-(2), Petitioner challenges claims 1, 5, 13, 20, 21, 29, 30, 34, 42, and 49 of the '267 patent.

A. Prior Art Patents and Printed Publications

The '267 patent issued from U.S. Patent Application No. 12/287,064 ("064 application"), filed on October 3, 2008. The '064 application is a continuation-in-part of Application No. 12/077,041 ("041 application"), filed on March 14, 2008.

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