UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC. and TWITTER, INC. Petitioner

v.

SUMMIT 6 LLC Patent Owner

Case: IPR2015-00685 Patent No. 7,765,482

Title: Web-Based Media Submission Tool

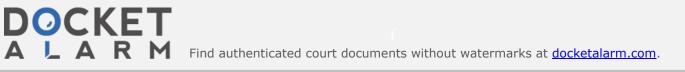
PATENT OWNER'S PRELIMINARY RESPONSE UNDER 37 C.F.R. § 42.107

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| | | 1. | Creamer does not teach or suggest "receiving an identification of a group of one or more items of digital content for transmission" (claims 1, 4, 6, 8, 10) or "receiving an identification of a group of one or more media objects for transmission" (claim 12), or "receiving an identification of a media object for" (claim 25) | | | |
| | | 2. | Creamer does not teach or suggest "pre-processing parameters including a specification of an amount of digital content" (claims 1, 4, 6, 8, 10) or "media data" (claim 12) | | | |
| | | 3. | Creamer does not teach or suggest "pre-processing said identified group of one or more items of digital content using pre-processing parameters" (claims 1, 4, 6, 8, 10) or "pre- processing said identified group of one or more media object[s] using [or in accordance with] said received pre-processing parameters." (claims 12, 25) | | | |

| | | 4. | contro group form | mer does not teach or suggest "pre-processing parameters olling said client device in a placement of said identified of one or more items of digital content into a specified in preparation for publication to one or more devices." ns 1, 4, 6, 8, 10, 51) |) |
|------|------|--------|--|--|---|
| | | 5. | | ner does not teach or suggest "receiving an identification olurality of items of digital content." (claim 4) | |
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EXHIBIT LIST

| Exhibit 2001 | [PROTECTIVE ORDER MATERIAL] RIM–Summit 6 License and Settlement Agreement (executed October 17, 2012). |
|--------------|--|
| Exhibit 2002 | [PROTECTIVE ORDER MATERIAL] Facebook–Summit 6 License and Settlement Agreement (February 8, 2013). |
| Exhibit 2003 | Jury Charge and Verdict Form, <i>Summit 6 LLC v. Research in Motion Corp. et al.</i> , Civil Action No. 3:11-cv-00367-O (N.D.Tex., April 5, 2013). |
| Exhibit 2004 | Excerpts of Trial Testimony of Dr. Mark Jones, <i>Summit 6</i> <i>LLC v. Research in Motion Corp. et al.</i> , Civil Action No. 3:11-cv-00367-O, N.D.Tex. (April 4, 2013). |
| Exhibit 2005 | Summit6-1876—Correspondence, T. Anderson to H. Latham of Moore Data Management Services (September 15, 1998). |
| Exhibit 2006 | Summit6-4346—Correspondence, T. Anderson to J. Graff of RealSelect, Inc., Proposal to integrate Rimfire system with Realtor.com (April 26, 1999). |
| Exhibit 2007 | Summit6-1606—Press Release, "New Prepare and Post Technology from PictureWorks Technology, Inc. Revolutionizes Use of Photos in Internet Marketing of Real Estate," (November 7, 1998). |
| Exhibit 2008 | Summit6-1962—Press Release, "Moore Data Management Services and PictureWorks Technology, Inc., Announce Partnership to Revolutionize Use of Real Estate Photos on the Internet," (Business Wire, November 6, 1998). |
| Exhibit 2009 | Excerpts of Trial Testimony of Lisa Wood, <i>Summit 6 LLC v.</i> <i>Research in Motion Corp. et al.</i> , Civil Action No. 3:11-cv- 00367-O, N.D.Tex. (March 29, 2013). |
| Exhibit 2010 | Rimfire Functional Specification Version 1.0 Core Feature Set, revision 4 (April 12, 1999). |
| Exhibit 2011 | Summit6-4341—Press Release, "PictureWorks Technology's PictureBay Solves #1 Frustration of eBay Members, Adding Pictures to Auctions," (April 12, 1999). |

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| Exhibit 2012 | Summit6-2415—pbay Marketing Plan (PictureWorks Technology, Inc., March 24, 1999). |
|--------------|---|
| Exhibit 2013 | Summit6-5246—Press Release "PictureWorks Technology's Auction Photo Service, Picturebay, Serves Over Two Million Images to eBay, Amazon.com and Auction Universe," (August 3, 1999). |
| Exhibit 2014 | White Paper, "Rimfire: The End-to-End Imaging Solution for Content Capture and Delivery," (Internet Pictures Corporation, 2000). |
| Exhibit 2015 | Market Study, "Image Servers - Early Adopter Case Studies," (Tony Henning and Future Image, Inc., 2001). |
| Exhibit 2016 | Summit6-5178—Excerpts of Woerner et al., "eBay for Dummies," (IDG Books Worldwide, Inc., 1999). |
| Exhibit 2017 | Press Release, "iPIX Acquisition Locks up Internet Picture Market," (March 9, 2000). |
| Exhibit 2018 | Press Release, "iPIX to Acquire PictureWorks Technology, Inc. to form End-to-End Internet Imaging Solutions Company," (PictureWorks Technology, Inc., March 8, 2000 [Exhibit 99.1 to 8-k filing]). |
| Exhibit 2019 | iPIX Presentation, "Enhancing Classified Advertising with Visual Data," (Don Strickland and Sarah Pate, October 2, 2003). |
| Exhibit 2020 | [PROTECTIVE ORDER MATERIAL] Confidential Information Memorandum, "AdMission" (Swiftsure Capital LLC, December 13, 2004). |
| Exhibit 2021 | [PROTECTIVE ORDER MATERIAL] Amendment No. 3 to the Visual Content Services Agreement Between eBay and iPIX (June 27, 2003). |
| Exhibit 2022 | Excerpts of Trial Testimony of Scott Lewis, <i>Summit 6 LLC v.</i> <i>Research in Motion Corp. et al.</i> , Civil Action No. 3:11-cv- 00367-O, N.D.Tex. (April 1, 2013). |

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