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).....17

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).....25

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)....28

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4. Creamer does not teach or suggest "pre-processing parameters controlling said client device in a placement of said identified group of one or more items of digital content into a specified form in preparation for publication to one or more devices." (claims 1, 4, 6, 8, 10, 51) 30

5. Creamer does not teach or suggest "receiving an identification of a plurality of items of digital content." (claim 4) 33

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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, *Summit 6 LLC v. Research in Motion Corp. et al.*, Civil Action No. 3:11-cv-00367-O (N.D.Tex., April 5, 2013).
Exhibit 2004	Excerpts of Trial Testimony of Dr. Mark Jones, *Summit 6 LLC v. Research in Motion Corp. et al.*, 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, *Summit 6 LLC v. Research in Motion Corp. et al.*, 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, *Summit 6 LLC v. Research in Motion Corp. et al.*, Civil Action No. 3:11-cv-00367-O, N.D.Tex. (April 1, 2013).

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