IN THE 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 No.: IPR2015-00687
Patent 7,765,482

PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,765,482

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1. Claims 13, 14, 19, and 21-23 are invalid as obvious over Mattes. 12
a) [13.P]: a computer implemented method of pre-processing digital content in a client device for subsequent electronic publishing 12
b) [13.1]: receiving an identification of digital content, said digital content including one or more of image content, video content, and audio content 13
c) [13.2.1]: pre-processing said identified digital content at said client device in accordance with one or more pre-processing parameters that are received from a device separate from said client device to produce pre-processed digital content 14
d) [13.2.2]: said one or more pre-processing parameters controlling said client device in a placement of said digital content into a specified form in preparation for publication to one or more devices that are remote from a server device and said client device 15

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e) [13.3]: retrieving information that enables identification of a user, said retrieved information being available to said client device prior to said received identification ...16
f) [13.4.1]: transmitting a message from said client device to said server device for subsequent publishing device to said one or more devices that are remote from said server device and said client device 18
g) [13.4.2]: said transmitted message including said pre-processed digital content and said retrieved information 19
h) [14.1]: wherein said pre-processing comprises reducing a file size or compressing said digital content.....19
i) [19.1]: wherein said retrieving comprises retrieving a user identifier. 20
j) [21.1]: wherein said retrieving comprises retrieving in a manner that is transparent to said user. 21
k) [22.1]: wherein said one or more pre-processing parameters enable said client device to place said digital content into a specified form in preparation for publication to one or more devices on which said digital content is to be electronically displayed.....21
l) [23.1] wherein said pre-processing comprises resizing said digital content. 23

2. Claims 38, 40-42, 44-46, and 49 are invalid as obvious over Mattes.....23

a) [38.P]: A computer implemented method for pre-processing digital content in a client device for subsequent electronic distribution 23
b) [38.1.1]: initiating by said client device, a transfer of digital content from said client device to a server device, … 24
c) [38.1.2]: … said digital content including one or more of image content, video content, and audio content 25
d) [38.2.1]: pre-processing said digital content at said client device in accordance with one or more pre-processing parameters….....26
e) [38.2.2]: …said one or more pre-processing parameters being provided to said client device from a device separate from said client device… 27

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f) [38.2.3]: said one or more pre-processing parameters controlling said client device in a placement of said digital content into a specified form in preparation for publication to one or more devices that are remote from a server device and said client device 28
g) [38.3.1]: transmitting a message from said client device to said server device for subsequent distribution to said one or more devices that are remote from said server device and said client device 30
h) [38.3.2]: said transmitted message including said pre-processed digital content. 31
i) [40.1]: receiving an identification of said digital content for transmission prior to said pre-processing 32
j) [41.1]:wherein said pre-processing comprises reducing a file size or compressing said digital content.....33
k) [42.1]: wherein said pre-processing comprises resizing said digital content.....33
l) [44.1]: wherein said transmitted message includes identifying information for said digital content. 34
m) [45.1]: wherein said identifying information is retrieved from storage in said client device. 35
n) [49.1]: wherein said identifying information includes user information. 36

B. Ground 2: Claims 16, 17, 18, 20, 35 and 46 are invalid as obvious over Mattes in view of Creamer 37

1. *KSR* Rationale: the combinations apply a known technique to a known device (method, or product) ready for improvement to yield predictable results 37

2. Claims 16, 17, 18, 20, and 46 are invalid as obvious over Mattes in view of Creamer.....39

a) [16.1]: wherein said pre-processing comprises pre-processing in accordance with one or more pre-processing parameters that have been previously downloaded to said client device.....39
b) [17.1]: wherein said pre-processing comprises pre-processing in accordance with one or more pre-processing parameters that have been downloaded to said client device prior to said identification. 40

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c) [18.1]: wherein said pre-processing comprises pre-processing in accordance with one or more pre-processing parameters that have been stored in memory of said client device prior to said identification. 41
d) [20.1] wherein said retrieving comprises retrieving a password. 42
e) [46.1]: wherein said identifying information includes a file name 43
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a) [35.P]: a computer implemented method for pre-processing digital content at a client device for subsequent electronic publishing.....43
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c) [35.1.2]: said received command enabling selection of digital content 46
d) [35.1.3]: said digital content including one or more of image content, video content, and audio content. 46
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