

# Demonstratives of Petitioner S

***Inter Partes* Review of  
U.S. Patent No. 8,825,084 and 8,32**

**IPR2019-00714**

**IPR2019-00715**

**Oral Hearing: June 9, 2020**

## IPR2019-00714 and -00715 Petitioner Snap Inc.'s oral hearing

### IPR2019-00714 ('084 patent) / -00715 ('327 patent)

- Board's initial determination finding challenged claims and *Crowley* grounds is correct
- Board did not appreciate full disclosure of Winkler
  - Challenged claims are unpatentable over *Winkler* and *Altman*

### IPR2019-00715: substitute claim 21

- Adding video to pop-up display would have been obvious
- Substitute claim 21 does not have written description support
- Substitute claim 21 is unpatentable under *Alice*

## Instituted Grounds

### IPR2019-00714

- Ground 1: Claims 1-2, 5-6, 9-10, 12-13, 15 as obvious over
- Ground 2: Claims 1-2, 5-6 as obvious over *Lemmela* and
- Ground 3: Claims 9-10, 12-13, 15 as obvious over *Lem*

### IPR2019-00715

- Ground 1: Claims 1-3, 8, 10-11, 13-15 as obvious over
- Ground 2: Claims 1-3, 8, 13-15 as obvious over *Lemme*
- Ground 3: Claims 10-11 as obvious over *Lemmela, Cro*
- Ground 4: Claims 9 and 20 as obvious over *Lemmela, C*

## Challenged Claims

'327 patent, claim 1

1. A mobile device comprising:  
a display; and  
a processor module communicatively coupled to the display and configured to receive executable instructions to:  
display a graphical user interface on the display;  
receive data indicative of a current location of the mobile device;  
determine at least one action spot within a predetermined distance from the current location of the mobile device, the at least one action spot corresponding to a location where at least one other mobile device has engaged in documenting action within a predetermined period of time;  
signify the at least one action spot on the graphical user interface; and  
provide an indication of activity level at the at least one action spot.

'084 p

1. A server configured to:  
receive data indicative of a current location of the mobile device;  
determine at least one action spot within a predetermined distance from the current location of the mobile device, the at least one action spot corresponding to a location where at least one other mobile device has engaged in at least one documenting action within a predetermined period of time;  
capture images, capturing the at least one action spot;  
transmit the at least one action spot to the mobile device; and  
transmit to the mobile device an indication of activity level at the at least one action spot, wherein the activity level is based on a number of images captured, and a number of images captured within a predetermined period of time.

00715 Ex. 1001 claim 1

## Claim Construction: “action

At this juncture, we do not see the need to expressly construe the term “action spot,” except to resolve a dispute raised by Patent Owner’s arguments. Relying on the alleged lexicography of the term “action spot,” Patent Owner focuses on the words “is occurring” to argue that “historical activity occurring days or weeks ago is unlike the claimed solution.” Prelim. Resp. 28 (citing Ex. 2001 ¶ 53). Although the Specification seems to define “action spot” to encompass a temporal requirement rooted in the present tense (“is occurring”), it also offers embodiments that are not limited to the presently occurring activity. Ex. 1001, 3:3–5, 8:44–48. For example, when

-00714, Institution Decision (Paper 9) at 12; *see also* -00715:  
Institution Decision (Paper 9) at 8

occurring.” Therefore, according to the plain meaning of the claim language, “action spot” refers to a location or event where the activity occurred.”

-00714, Institution Decision (Paper 9) at 14;

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.