

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 a 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

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;

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