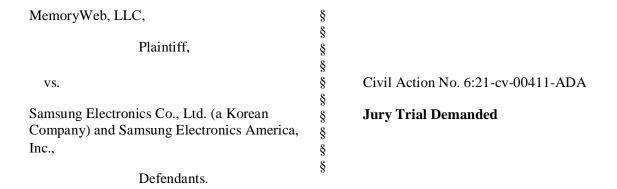
UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS WACO DIVISION



JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Agreed Scheduling Order (Dkt. 35) and the Court's Standing Order Governing Proceedings – Patent Cases dated April 14, 2022, Plaintiff MemoryWeb, LLC ("MemoryWeb") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") hereby submit this Joint Claim Construction Statement identifying the disputed and agreed constructions for U.S. Patent Nos. 10,423,658 ("the '658 patent"), 10,621,228 ("the '228 patent"), and 11,163,823 ("the '823 patent").

I. Disputed Claim Constructions

Term	Claim Term(s) /	MemoryWeb's Proposed	Samsung's Proposed
No.	Phrase(s)	Construction	Construction
1	[first/second] "geotag"	Plain and ordinary meaning;	digital data assigned to a
		or, in the alternative:	file describing the latitude
	'658 patent, claim 1		and longitude of the
		data associated with a file	location where the
	Samsung proposed	describing geographic	photograph or video was
	term for construction	information	taken



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2	"thumbnail image" '658 patent, claim 1; '228 patent, claim 1; '823 patent, claim 5 Samsung proposed term for construction	Plain and ordinary meaning; or, in the alternative: reduced-sized representation of at least a portion of an image	reduced-sized duplicate of an image
3	"the [first / second] location being associated with the geographic coordinates of a [first / second] geotag" '658 patent, claim 1 Samsung proposed term for construction	Plain and ordinary meaning	Indefinite

4	"[first / second] set of digital photographs and videos including all of the digital photographs and videos associated with the [first / second] geotag" "[third / fourth set of digital photographs and videos including digital photographs and videos associated with [first / second] person" "the [first / second] set of digital files including digital files including associated with the [first / second] location" '658 patent, claim 1; '228 patent, claim 1	Plain and ordinary meaning	"including" in these phrases means "consisting of," i.e., is closed-ended
	Samsung proposed terms for construction		
5	"partially overlapping the [first / second] location selectable thumbnail image" '658 patent, claim 1 Samsung proposed term for construction	Plain and ordinary meaning; or, in the alternative: which overlaps a first portion of the [first / second] location selectable thumbnail image and does not overlap a second portion of the [first / second] location selectable thumbnail image	a portion of which does not overlap the [first / second] location selectable thumbnail image



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6	"scaled replica" '658 patent, claim 1 Samsung proposed term for construction	Plain and ordinary meaning; or, in the alternative: a scaled copy or scaled reproduction	an identical copy that is scaled up or down equally in all dimensions
7	[first/second] "person-location selectable element" '658 patent, claims 8, 11 Samsung proposed term for construction	Plain and ordinary meaning, or in the alternative: a selectable element associated with the [first/second] person and locations	a selectable element, responsive to the selection of which a representation of all locations having a digital photograph or video associated with the [first / second] person is displayed; otherwise, indefinite
8	"digital file" '228 patent, claim 1; '823 patent, claims 1 and 29 Samsung proposed term for construction	Plain and ordinary meaning	an electronic file that can be in various file formats (e.g., PNG, JPEG, PDF, TIFF, MP3, MP4, WAV, and GIF) that are of items such as photos, videos, audio files, and documents
9	"the first digital file having a first size in the first person view and a second size in the first detail view, wherein the second size is greater than the first size" '823 patent, claims 1 and 29 Samsung proposed term for construction	Plain and ordinary meaning	Indefinite

10	"profile image"	Plain and ordinary meaning; or, in the alternative:	picture of a person displayed on the same page
	'823 patent, claims 5 and 31	an image representing the	as profile information about the person; otherwise,
		[first/second] person	indefinite
	Samsung proposed term for construction		

II. Agreed Constructions

Claim Term(s) / Phrase(s)	Agreed Construction
[first/second] "count value image"	Plain and ordinary meaning
'658 patent, claim 1	
"relationship information associated with the	Plain and ordinary meaning
first person and another person"	
'823 patent, claim 12	
"tag information"	any type of digital data that can be assigned to
	a file to describe some aspect of that file
'823 patent, claim 21	through a tagging process

Respectfully submitted,

Dated: May 20, 2022

/s/ Allan A. Kassenoff_

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