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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS, LLC  
Petitioner

v.

MEMORYWEB, LLC  
Patent Owner

IPR2021-01413

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT 10,621,228**

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**I. MANDATORY NOTICES**

**A. Real Party-in-Interest**

Pursuant to 37 C.F.R. § 42.8(b)(1), Unified Patents, LLC (“Unified” or “Petitioner”) certifies that Unified is the real party-in-interest and certifies that no other party exercised control or could exercise control over Unified’s participation in this proceeding, filing this petition, or conduct in any ensuing trial. In view of *Worlds Inc. v. Bungie, Inc.*, 903 F.3d 1237, 1242-44 (Fed. Cir. 2018), Unified has submitted voluntary discovery to support its certification. *See* EX1017 (Declaration of Keven Jakel).

**B. Related Matters**

According to public records, U.S. Patent 10,621,228 (“the ’228 patent” (EX1001)) is owned by MemoryWeb, LLC (“Patent Owner”).

As of the filing date of this petition, to the best of Petitioner’s knowledge, the ’228 patent is or has been involved in the litigations listed below, of which Petitioner is not involved. *See* EX1018. To the best of Petitioner’s knowledge, the ’228 patent has not been involved in any post-grant proceedings.

	Case Caption
1.	<i>MemoryWeb, LLC v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-cv-00411 (W.D.Tex)
2.	<i>MemoryWeb, LLC v. Apple Inc.</i> , 6:21-cv-00531 (W.D.Tex)

3.	<i>MyHeritage (USA), Inc. et. al. v. MemoryWeb, LLC</i> , 1:21-cv-02666 (N.D.Ill)
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**C. Counsel**

Ellyar Y. Barazesh (Reg. No. 74,096) is lead counsel; Ashraf Fawzy (Reg. No. 67,914) is back-up counsel.

**D. Service Information**

Unified consents to electronic service at [ellyar@unifiedpatents.com](mailto:ellyar@unifiedpatents.com) and [afawzy@unifiedpatents.com](mailto:afawzy@unifiedpatents.com). Petitioner can be reached at Unified Patents, LLC, P.O. Box 53345, Washington, DC 20009, Tel: (925) 434-8754.

**II. CERTIFICATION OF GROUNDS FOR STANDING**

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and Petitioner is not barred or estopped from requesting *inter partes* review challenging the patent claims on the grounds identified herein.

**III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED**

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)–(2), Petitioner challenges claims 1-7 (the “Challenged Claims”) of the ’228 patent based on the specific grounds identified below.

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