U.S. Patent No. 10,621,228 Patent Owner's Sur-Reply IPR2021-01413

Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, LLC
Petitioner

v.

MEMORYWEB, LLC
Patent Owner

Patent No. 10,621,228

Inter Partes Review No. IPR2021-01413

PATENT OWNER'S SUR-REPLY

DOCKET

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I.		The Reply is Improper	
II.		Claim Construction)
	A.	Limitations [1b], [1d], [1e] and claim 3)
	В.	Limitations [1n], [1p] / claim 5	,
III.		Petitioner Has Failed to Meet Its Burden Under Grounds 1 - 4)
	A.	Limitation [1c]: "the map view including: (i) an interactive map")
	В.	Limitation [1d] the "map view including [first/second] location selectable thumbnail image[s]")
		1. Okamura Disparages Features Relevant to Flora)
		2. Okamura's Stated "Preference" Is Relevant Even if Okamura Does Not Teach Away	;
		3. Petitioner's Reliance on Okamura Figs. 27A-B and Fig. 41 is Misplaced	ļ
	C.	Limitations [1b], [1d] and [1e]: "responsive to a first input, causing a map view to be displayed"	7
	D.	Limitations [1g] and [1j]: "[a first/second location view including] a first/second location name associated with the first/second location"18)
		1. Okamura and Flora (Ground 1)18	,
		2. Okamura, Flora, and Gilley (Ground 2) / Okamura, Flora, Wagner, and Gilley (Ground 4))
	E.	Limitations [1n] and [1p]: "the people view including: a first name [and] a second name")
		1. Okamura and Flora (Ground 1))
		2. Okamura, Flora, and Gilley (Ground 3) / Okamura, Flora, Wagner, and Gilley (Ground 4)	
	F.	Claim 3: "the first indication feature is connected to the first location selectable thumbnail image")
	G.	Claim 5: "the map view further includes a first indication feature" and "second indication feature")
IV		Samsung and Apple are Unnamed RPIs23	;



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Apple and Samsung Desire Review of the '228 Patent and Benefit from Unified's Petition	.24
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The Board Cannot Disregard the Statutory Requirement to Name	27



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