UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,
Petitioner,

v.

MEMORYWEB, LLC,
Patent Owner.

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Case No. IPR2022-00031
U.S. Patent No. 10,621,228
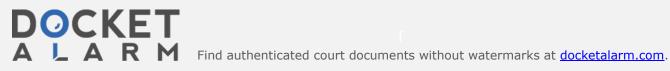
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PETITIONER'S REPLY

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1004	CV of Dr. Loren Terveen
1005	Aperture 3 User Manual, Apple Inc. (Feb. 2010) ("A3UM")
1006	U.S. Patent App. Pub. No. 2010/0058212 A1 to Belitz et al. ("Belitz")
1007	U.S. Patent No. 9,612,126 to Beletski et al.
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1020	Declaration of Matthew Birdsell
1021	Apple Inc., www.apple.com (various) (Archive.org: Feb. 17 to Mar. 5, 2010)
1022	Standard Affidavit, Internet Archive (Oct. 8, 2021), available at https://archive.org/legal/affidavit.php

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1023	Complaint, *MemoryWeb, LLC v. Apple, Inc.*, Civ. No. 6:21-cv-531, Dkt. 1 (W.D. Tex. May 25, 2021).
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1025	RESERVED
1026	Joint Motion for Entry of Agreed Scheduling Order, *MemoryWeb, LLC v. Apple, Inc.*, Civ. No. 6:21-cv-531, Dkt. 24 (W.D. Tex. Oct. 1, 2021)
1027	Plaintiff MemoryWeb, LLC's Initial Infringement Contentions, *MemoryWeb, LLC v. Apple, Inc.*, Civ. No. 6:21-cv-531 (W.D. Tex. Sept. 24, 2021) (service only)
1028	U.S. Patent App. Pub. No. 2011/0074811 A1 to Hanson et al.
1029	*Top 11 Technologies of the Decade*, IEEE Spectrum, pp. 27-63 (Jan. 2011).
1030	Wikipedia Entry for "Photo sharing" (Archive.org: May 6, 2011), available at https://web.archive.org/web/20110506092919/ http:/en.wikipedia.org/wiki/Photo_sharing
1031	Wikipedia Entry for "Image organizer" (Archive.org: Apr. 27, 2010), available at https://web.archive.org/web/20100427092553/ https:/en.wikipedia.org/wiki/Image_organizer
1032	Todd Bogdan, "*Announcing Picasa 3.5, now with name tags, better geotagging and more,*" The Official Google Blog (Sept. 22, 2009) (Archive.org: Nov. 11, 2009), available at https://web.archive.org/web/20091103113337/ http://googlephotos.blogspot.com/2009/09/announcing-picasa-35-now-with-name-tags.html
1033	Stephen Shankland, "*What's the best Web site for geotagged photos?,*" CNET (Mar. 18, 2009), available at https://www.cnet.com/tech/computing/whats-the-best-web-site-for-geotagged-photos/
1034	Panoramio, "*Embedding a Panoramio map into your web page*" (Archive.org: Mar. 28, 2010), available at https://web.archive.org/web/20100328215828/ http://www.panoramio.com/help/embedding

No.	Exhibit Description
1035	Shu-Wai Chow, *PHP Web 2.0 Mashup Projects*, Packt Publishing (2007)
1036	Exchangeable image file format for digital still cameras: Exif Version 2.2, JEITA CP-3451 (Apr. 2002), available at https://www.exif.org/Exif2-2.PDF.
1037	Information Interchange Model Version 4, IPTC-NAA (July 1999)
1038	Guidelines for Handling Image Metadata v. 1.0, Metadata Working Group (Sept. 2008), , available at https://web.archive.org/web/20090206012835/ http:/metadataworkinggroup.org/pdf/mwg_guidance.pdf.
1039	iPhoto '09 Review (Archive org: May 26, 2009), available at https://web.archive.org/web/20090901000000*/http://www.killersites.com/magazine/2009/iphoto-09-review/
1040	Google Code, Google Maps API Reference (Archive.org: Feb. 23, 2010), available at: http://code.google.com/apis/maps/documentation/reference.html
1041	U.S. Patent App. Pub. No. 2009/0113350 A1 to Hibino et al.
1042	U.S. Patent App. Pub. No. 2006/0165380 A1 to Tanaka et al.
1043	Flickr, Tour: Maps (Archive.org: Feb. 9, 2010), available at http://www.flickr.com/tour/maps
1044	Devin Coldewey, *Review: Aperture 3*, CrunchGear (Archive.org: Mar. 22, 2010), available at http://www.crunchgear.com/2010/03/19/review-aperture-3/
1045	Tony Wu, *Using Aperture 3: Part 1* (Archive.org: Apr. 2, 2010), available at http://www.tonywublog.com/20100330/first-good-impressions-using-aperture-3.html
1046	Complaint for Declaratory Judgment, *MyHeritage (USA), Inc. et al. v. MemoryWeb, LLC*, Case No. 1:21-cv-02666, Dkt. 1 (N.D. Ill. May 17, 2021)
1047	Apple Inc., *Mac OS X v10.6.3 Update* (Mar. 29, 2010) (Archive.org Apr. 11, 2010), available at

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