

IPR2022-00031  
Patent Nos. 10,621,228

Paper No. \_\_\_\_

**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

Patent No. 10,621,228

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*Inter Partes* Review No. IPR2022-00031

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**PATENT OWNER'S RESPONSE BRIEF ON ALLEGED WAIVER AND  
FORFEITURE**

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**LISTING OF EXHIBITS**

<b>Exhibit No.</b>	<b>Description</b>
2001	WITHDRAWN
2002	Hyunmo Kang et al., <i>Capture, Annotated, Browse, Find, Share: Novel Interfaces for Personal Photo Management</i> , International Journal of Human-Computer Interaction, 23(3), 315-37 (2007) (“Kang”)
2003	Jaffe et al., <i>Generating Summaries and Visualization for Large Collections of Geo-Referenced Photographs</i> , Proceedings of the 8th ACM SIGMM International Workshop on Multimedia Information Retrieval, MIR 2006, October 26-27, 2006 (“Jaffe”)
2004	Allan Hoffman, <i>Create Great iPhone Photos: Apps, Tips, Tricks, and Effects</i> , No Starch Press, Inc. (Copyright 2011)
2005	U.S. Patent Publication No. 2010/0171763 (“Bhatt”)
2006	Feb. 8, 2022 eBay Order Confirmation for “Apple Aperture 3 Upgrade for Mac Brand New Photography”
2007	Apple Inc. Aperture Software License Agreement
2008	Declaration of John Leone, <i>Cisco Systems, Inc. v. Centripetal Networks, Inc.</i> , IPR2018-01436, EX1005 (July 20, 2018)
2009	Aperture 3 User Manual, <a href="http://documentation.apple.com/aperture/usermanual">http://documentation.apple.com/aperture/usermanual</a> (Archive.org: July 26, 2010)
2010	Aperture 3 User Manual, <a href="http://documentation.apple.com/aperture/usermanual">http://documentation.apple.com/aperture/usermanual</a> (Archive.org: Feb. 17, 2010)
2011	RESERVED

<b>Exhibit No.</b>	<b>Description</b>
2012	RESERVED
2013	Apple, Inc., <a href="http://www.apple.com">www.apple.com</a> , (Archive.org: Mar. 12, 2010)
2014	Devin Coldewey, <i>Review: Aperture 3</i> , CrunchGear ( <a href="https://techcrunch.com/2010/03/19/review-aperture-3/">https://techcrunch.com/2010/03/19/review-aperture-3/</a> ) (last accessed Feb. 2, 2022)
2015	Hilary Greenbaum, <i>Who Made Google's Map Pin?</i> , The New York Times, (Apr. 18, 2011)
2016	Google Developers, <i>Customizing a Google Map: Custom Markers</i> (last accessed Feb. 17, 2022)
2017	KML4Earth, Google Earth/Maps Public Icons, <a href="http://kml4earth.appspot.com:80/icons.html">http://kml4earth.appspot.com:80/icons.html</a> (Archive.org May 27, 2012)
2018	Declaration of Angelo J. Christopher
2019	RESERVED
2020	RESERVED
2021	Apple, Inc., "Apple Human Interface Guidelines" (Aug. 20, 2009)
2022	Wilbert O. Galitz, "The Essential Guide to User Interface Design: An Introduction to GUI Design Principles and Techniques," Wiley Publishing, Inc. (3 <sup>rd</sup> Ed.) (2007)
2023	Transcript of Deposition of Dr. Loren Terveen (Vol. I)
2024	Transcript of Deposition of Dr. Loren Terveen (Vol. II)
2025	Declaration of Rajeev Surati, Ph.D
2026	Transcript of Deposition of Matthew Birdsell

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