Filed: December 23, 2022

UNITED STATE	S PATENT AND TRADEMARK OFFICE
BEFORE THE	PATENT TRIAL AND APPEAL BOARD
	APPLE INC., Petitioner,
	V.
	MEMORYWEB, LLC, Patent Owner.
	Case No. IPR2022-00031 U.S. Patent No. 10,621,228

**PETITIONER'S REPLY** 



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		1. A3UM Teaches Associating Names to Digital Images Without Facial Recognition	
		2. A Skilled Artisan Would Have Found Using Thumbnails Instead of Pins to Be Obvious Based on A3UM and Belitz2	0
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#### **UPDATED EXHIBIT LIST**

No.	<b>Exhibit Description</b>
1001	U.S. Patent No. 10,621,228
1002	File History of U.S. Patent No. 10,621,228
1003	Declaration of Dr. Loren Terveen regarding U.S. Patent No. 10,621,228
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.
1008	RESERVED
1009	RESERVED
1010	U.S. Patent No. 9,098,531 ("'531 patent")
1011	U.S. Patent No. 9,552,376 ("'376 patent")
1012	U.S. Patent No. 10,423,658 ("'658 patent")
1013	RESERVED
1014	U.S. Patent No. 11,017,020 ("'020 patent")
1015	File History of U.S. Patent No. 9,098,531
1016	File History of U.S. Patent No. 9,552,376
1017	File History of U.S. Patent No. 10,423,658
1018	RESERVED
1019	File History of U.S. Patent No. 11,017,020
1020	Declaration of Matthew Birdsell
1021	Apple Inc., <u>www.apple.com</u> (various) (Archive.org: Feb. 17 to Mar. 5, 2010)
1022	Standard Affidavit, Internet Archive (Oct. 8, 2021), available at <a href="https://archive.org/legal/affidavit.php">https://archive.org/legal/affidavit.php</a>



No.	Exhibit Description
1023	Complaint, MemoryWeb, LLC v. Apple, Inc., Civ. No. 6:21-cv-531, Dkt. 1 (W.D. Tex. May 25, 2021).
1024	Affidavit of Service, <i>MemoryWeb, LLC v. Apple, Inc.</i> , Civ. No. 6:21-cv-531, Dkt. 9 (W.D. Tex. Jun. 11, 2021) (service as of June 10, 2021)
1025	RESERVED
1026	Joint Motion for Entry of Agreed Scheduling Order, <i>MemoryWeb, LLC</i> v. <i>Apple, Inc.</i> , Civ. No. 6:21-cv-531, Dkt. 24 (W.D. Tex. Oct. 1, 2021)
1027	Plaintiff MemoryWeb, LLC's Initial Infringement Contentions, <i>MemoryWeb, LLC v. Apple, Inc.</i> , 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 <a href="https://web.archive.org/web/20110506092919/">https://web.archive.org/web/20110506092919/</a> <a href="https://web.archive.org/web/20110506092919/">https://web.archive.org/web/20110506092919/</a>
1031	Wikipedia Entry for "Image organizer" (Archive.org: Apr. 27, 2010), available at <a href="https://web.archive.org/web/20100427092553/">https://web.archive.org/web/20100427092553/</a> <a href="https://en.wikipedia.org/wiki/Image_organizer">https://en.wikipedia.org/wiki/Image_organizer</a>
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1033	Stephen Shankland, "What's the best Web site for geotagged photos?," CNET (Mar. 18, 2009), available at <a href="https://www.cnet.com/tech/computing/whats-the-best-web-site-for-geotagged-photos/">https://www.cnet.com/tech/computing/whats-the-best-web-site-for-geotagged-photos/</a>
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No.	Exhibit Description
1035	Shu-Wai Chow, <i>PHP Web 2.0 Mashup Projects</i> , Packt Publishing (2007)
1036	Exchangeable image file format for digital still cameras: Exif Version 2.2, JEITA CP-3451 (Apr. 2002), available at <a href="https://www.exif.org/Exif2-2.PDF">https://www.exif.org/Exif2-2.PDF</a> .
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 <a href="https://web.archive.org/web/20090206012835/">https://web.archive.org/web/20090206012835/</a> <a href="https://metadataworkinggroup.org/pdf/mwg_guidance.pdf">http://metadataworkinggroup.org/pdf/mwg_guidance.pdf</a> .
1039	iPhoto '09 Review (Archive org: May 26, 2009), available at <a href="https://web.archive.org/web/20090901000000*/http://www.killersites.com/magazine/2009/iphoto-09-review/">https://www.killersites.com/magazine/2009/iphoto-09-review/</a>
1040	Google Code, Google Maps API Reference (Archive.org: Feb. 23, 2010), available at: <a href="http://code.google.com/apis/maps/documentation/reference.html">http://code.google.com/apis/maps/documentation/reference.html</a>
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 <a href="http://www.flickr.com/tour/maps">http://www.flickr.com/tour/maps</a>
1044	Devin Coldewey, <i>Review: Aperture 3</i> , CrunchGear (Archive.org: Mar. 22, 2010), available at <a href="http://www.crunchgear.com/2010/03/19/review-aperture-3/">http://www.crunchgear.com/2010/03/19/review-aperture-3/</a>
1045	Tony Wu, <i>Using Aperture 3: Part 1</i> (Archive.org: Apr. 2, 2010), available at <a href="http://www.tonywublog.com/20100330/first-good-impressions-using-aperture-3.html">http://www.tonywublog.com/20100330/first-good-impressions-using-aperture-3.html</a>
1046	Complaint for Declaratory Judgment, <i>MyHeritage (USA), Inc. et al. v. MemoryWeb, LLC</i> , Case No. 1:21-cv-02666, Dkt. 1 (N.D. Ill. May 17, 2021)
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