

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

MemoryWeb, LLC,

Plaintiff,

v.

Apple Inc.,

Defendant,

Case No. 6:21-cv-00531-ADA

**JURY TRIAL DEMANDED**

**PLAINTIFF MEMORYWEB, LLC'S INITIAL INFRINGEMENT CONTENTIONS**

Pursuant to the Case Readiness Status Report (Doc. 23), Plaintiff MemoryWeb, LLC (“MemoryWeb”) hereby submits the following initial infringement contentions with respect to Defendant Apple Inc.’s (“Apple”) infringement of U.S. Patent No. 9,552,376 (“the ‘376 patent”), U.S. Patent No. 10,423,658 (“the ‘658 patent”), U.S. Patent No. 10,621,228 (“the ‘228 patent”), and U.S. Patent No. 11,017,020 (“the ‘020 patent”) (collectively, “the Asserted Patents”).

MemoryWeb’s investigation is ongoing and the contentions set forth herein are based on the information available to MemoryWeb as of the date of these contentions. MemoryWeb reserves the right to supplement or amend this disclosure after receiving discovery from Apple, or other third parties, particularly documents and other discovery regarding Apple’s accused products (e.g., source code) and as additional information becomes available.

**I. Identification of the Asserted Claims**

Apple has infringed and continues to infringe at least the following claims of the ‘376 patent: claims 1-2. Apple has infringed and continues to infringe at least the following claims of the ‘658 patent: claims 1-5 and 7-15. Apple has infringed and continues to infringe at least the

following claims of the '228 patent: claims 1-9, 12, 14-15, and 17-19. Apple has infringed and continues to infringe at least the following claims of the '020 patent: 1-23, 25-53, and 55-59.<sup>1</sup> MemoryWeb's investigation is ongoing and discovery has not commenced. Accordingly, this identification of asserted claims is based on information available to MemoryWeb at this time. MemoryWeb reserves the right to add, delete, substitute, or otherwise amend this list of asserted claims should discovery, the Court's claim construction, or other circumstances so merit.

## **II. Identification of Priority Dates**

The priority date for claims 1-2 of the '376 patent, claims 1-5 and 7-15 of the '658 patent, and claims 1-9, 12, 14-15, and 17-19 of the '228 patent is February 28, 2014. The priority date for claims 1-23, 25-53, and 55-59 of the '020 patent is June 9, 2011. MemoryWeb reserves the right to update or amend this identification of priority dates should the Court's claim construction or other circumstances so merit.

## **III. Identification of Accused Products**

On information and belief, MemoryWeb identifies the following accused products: Apple has and continues to make, use, sell, offer for sale, and/or import products and services, including without limitation those marketed by Apple as: (1) iOS 14, iOS 13, iOS 12, iOS 11, and iOS 10 (collectively, "the Apple iOS Software"); (2) macOS 11.0 (Big Sur), macOS10.15 (Catalina), macOS 10.14 (Mojave), and macOS 10.13 (High Sierra) (collectively, "the Apple macOS Software"); and (3) iPadOS 14, and iPadOS 13 (collectively, "the Apple iPadOS Software").

Apple publicly released iOS 15 on September 20, 2021.

<https://www.apple.com/newsroom/2021/09/ios-15-is-available-today/>;

---

<sup>1</sup> Claims 10 and 27, and also claims 34-39 and 45-48 of the '020 patent are added relative to MemoryWeb's September 24, 2021 Identification of Asserted Claims. The Patent Office recently issued a Certificate of Correction correcting the dependency of claim 34. The correction resulted in the assertion of the impacted claims identified herein.

<https://www.apple.com/ios/ios-15/>. On information and belief, there are no material differences between the Photos application in iOS 15 and at least iOS 14 for purposes of infringement.

MemoryWeb reserves the right to amend its identifications of asserted claims and accused products, as well as other information contained herein, based on its investigation of iOS 15.

Apple publicly released iPadOS on September 20, 2021.

<https://www.apple.com/newsroom/2021/09/ipados-15-is-available-today/>;

<https://www.apple.com/ipados/ipados-15/>. On information and belief, there are no material differences between the Photos application in iPadOS 15 and at least iPadOS 14 for purposes of infringement. MemoryWeb reserves the right to amend its identifications of asserted claims and accused products, as well as other information contained herein, based on its investigation of iPadOS 15.

On information and belief, at least the following Apple products include and/or use the Apple iOS Software described above or substantially similar versions: iPhone (including, but not limited to, the iPhone 12 Pro Max, iPhone 12 Pro, iPhone 12, iPhone 12 mini, iPhone SE, iPhone 11 Pro Max, iPhone 11 Pro, iPhone 11, iPhone XS Max, iPhone XS, iPhone XR, iPhone X, iPhone 8 Plus, iPhone 8, iPhone 7 Plus, and iPhone 7 models), iPad (including, but not limited to, the), and iPod Touch (including, but not limited to, the iPod Touch 7th Generation models), iPad (including, but not limited to, the iPad Air (3rd Generation), iPad Pro 12.9-inch (2nd Generation), iPad Pro 12.9-inch (3rd Generation), iPad Pro 10.5-inch (2nd Generation), iPad Pro 10.5-inch (3rd Generation), iPad Pro 11-inch (1st Generation) iPad (5th Generation), iPad (6th Generation), and iPad Mini (5th Generation) models), iPod Touch (including, but not limited to, the iPod Touch (6th Generation) and iPod Touch (7th Generation) models). On information and belief, additional

Apple products are compatible with and use the Apple iOS Software, or substantially similar versions.

On information and belief, at the least the following Apple products include and/or use the Apple macOS Software or substantially similar versions: MacBook Air (including, but not limited to, the MacBook Air (M1, 2020), MacBook Air (Retina, 2020), MacBook Air (Retina, 2019), MacBook Air (Retina, 2018), and MacBook Air (2017) models), MacBook Pro (including, but not limited to the MacBook Pro 16-inch (2019), MacBook Pro 15-inch (2019), MacBook Pro 15-inch (2018), MacBook Pro 15-inch (2017), MacBook Pro 15-inch (2016), MacBook Pro 13-in. (M1, 2020), MacBook Pro 13-inch (2020, four ports), MacBook Pro 13-inch (2019, four ports), MacBook Pro 13-inch (2018, four ports), MacBook Pro 13-inch (2017, four ports), MacBook Pro 13-inch (2016, four ports), MacBook Pro 13-in. (2020, two ports), MacBook Pro 13-in. (2019, two ports), MacBook Pro 13-inch (2017, two ports), MacBook Pro 13-inch (2016, two ports) models), iMac (including, but not limited to, the iMac 21.5-in. (Retina 4K), iMac 27-in. (Retina 5K), iMac Pro, Mac mini (M1, 2020), and Mac mini (2018) models), and Mac Pro. On information and belief, additional Apple products are compatible with and use the Apple macOS Software, or substantially similar versions.

On information and belief, at the least the following Apple products include and/or use the Apple iPadOS Software or substantially similar versions: iPad (7th Generation), iPad (8th Generation), iPad Pro 12.9-inch (4th Generation), iPad Pro 11-inch (2nd Generation), and iPad Air (4th Generation). On information and belief, additional Apple products are compatible with and use the Apple iPadOS Software versions described above, or substantially similar versions

The Apple iOS software, the Apple iPadOS software, the Apple macOS software, and the Apple products described above that include and/or use this software are collectively referred to



herein as the “Accused Apple Products.” Unless otherwise specified, all references to the Accused Products refer to all versions of such products that were made, used, offered for sale, and/or sold in the United States, or imported into the United States, during the term of each of the Asserted Patents. MemoryWeb reserves the right to amend this identification of accused products, as well as other information contained herein, to incorporate new information as in becomes available under the course of discovery.

#### **IV. Claim Charts**

Claim charts identifying a location of each and every element of every asserted claim of the Asserted Patents in the Accused Apple Products are attached hereto as Exhibits A1-A3, B1-B3, C1-C3, and D1-D3. These claim chart illustrate Apple’s infringement using iOS 14, iPadOS 14, and macOS 11. MemoryWeb contends that there are no material differences between the Photos application in iOS 14, iPadOS 14, and macOS 11 and other versions of the Apple iOS Software, the Apple iPadOS Software, the macOS 11 Software, respectively. MemoryWeb reserves the right to amend these charts, as well as other information contained in these disclosures and contentions, to incorporate new information learned during the course of discovery. MemoryWeb also reserves the right to amend its claim charts, as well as other information contained in these disclosures and contentions, upon the Court’s issuance of a claim construction order.

#### **V. Literal Infringement and Doctrine of Equivalents**

Under the proper construction of the asserted claims, the limitations of each asserted claim in the Asserted Patents are satisfied literally in the Accused Apple Products. However, to the extent that any claim limitation or element is found not be literally embodied or practiced by the Accused Apple Products, MemoryWeb contends that the Accused Apple Products embody or

practice such claim limitations or elements under the doctrine of equivalents because there are no substantial differences, and the Accused Apple Products perform substantially the same function, in substantially the same way, to achieve substantially the same result.

## **VI. Direct Infringement**

Apple (including Apple's employees) and Apple's customers (including end users of the products described above) using the Accused Apple Products have directly infringed, and continue to directly infringe, the Asserted Claims as set forth in the attached claim charts. This infringement has occurred, either literally or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States without authority, the Accused Apple Products.

To the extent Apple contends that it or the Accused Apple Products do not perform each and every step of the Asserted Claims, Apple directs or controls the performance by others of each claim limitation that it does not perform itself, such that the performance of each claim limitation can be attributed to Apple.

## **VII. Induced and Contributory Infringement**

Apple has induced and continues to induce infringement of the Asserted Claims literally or under the doctrine of equivalents by making, selling, offering to sell, and/or importing the Accused Products to or for its customers (including end users), and providing such customers (including end users) with instructions and training on how to use the Accused Products in a manner that directly infringes the claims, all while Apple has knowledge of the Asserted Patents and Asserted Claims, and knowledge that such use of the Accused Products would infringe the Asserted Claims. Apple acts with knowledge and specific intent to encourage and facilitate such infringing acts by its customers. Apple's technical and marketing documentation for the Accused

Apple Products provides specific instruction for using, and actively encourages its customers to use, the Accused Apple Products in an infringing manner. *See, e.g.*, MW\_Apple\_003187; MW\_Apple\_003189; MW\_Apple\_003191; MW\_Apple\_003194; MW\_Apple\_003195; MW\_Apple\_003197; MW\_Apple\_003202; MW\_Apple\_003204; MW\_Apple\_003207; MW\_Apple\_003208; MW\_Apple\_003210.

Apple has and continues to contributorily infringe the Asserted Claims by using, offering to sell, selling, or importing the Accused Products. The Accused Products in operation form a component of a machine, manufacture, combination, or composition, constituting a material part of the invention for each of the Asserted Patents. Apple knows that the Accused Products are especially made or adapted for use in an infringement of the Asserted Claims, and that the Accused Products are not a staple article or other system capable of substantial non-infringing use.

Dated: September 24, 2021

Respectfully submitted,

/s/ Daniel J. Schwartz

Arthur Gollwitzer III  
Texas Bar No. 24073336  
Jackson Walker LLP  
100 Congress Avenue, Suite 1100  
Austin, TX 78701  
Telephone: 512.236.2268  
Facsimile: 512.236.2002  
agollwitzer@jw.com

Daniel J. Schwartz (*pro hac vice*)  
Zachary Sorman (*pro hac vice*)  
Angelo J. Christopher (*pro hac vice*)  
NIXON PEABODY LLP  
70 West Madison, Suite 3500  
Chicago, IL 60602-4224  
Tel: 312-977-4400  
djschwartz@nixonpeabody.com  
achristopher@nixonpeabody.com

zsorman@nixonpeabody.com

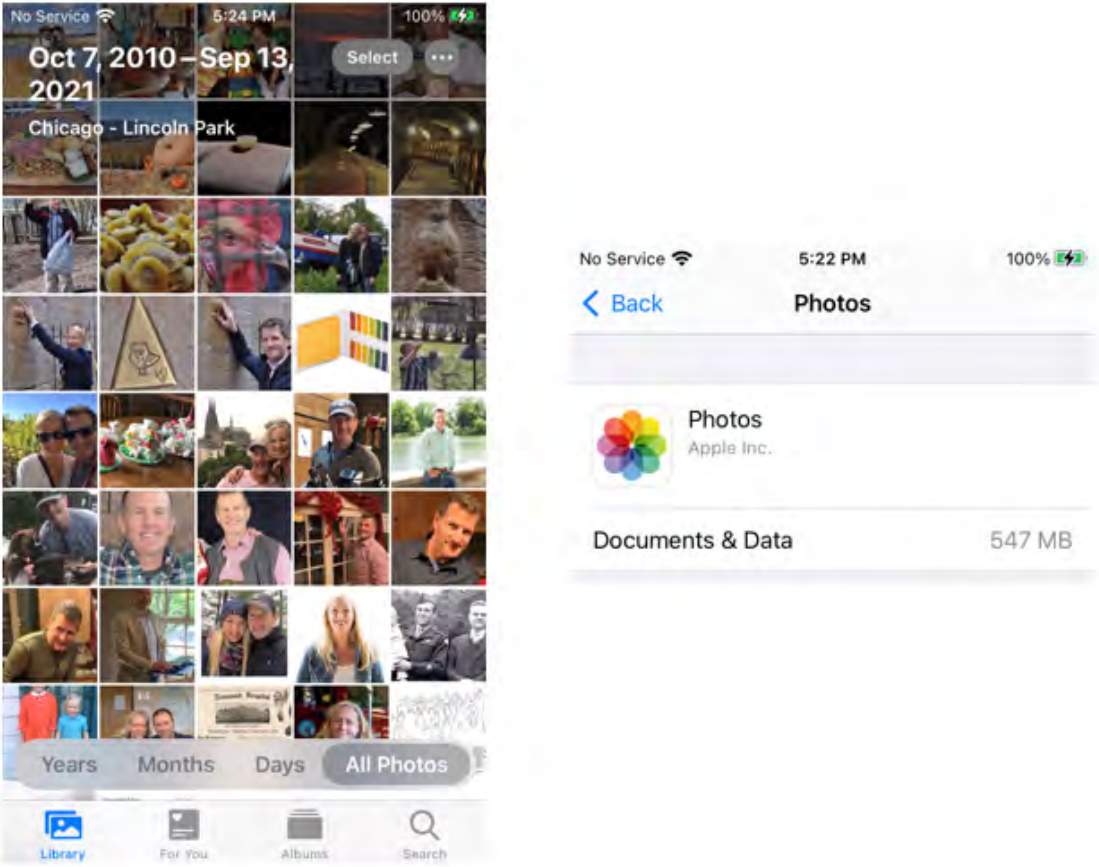
*Attorneys for Plaintiff MemoryWeb, LLC*

# **Exhibit A.1**

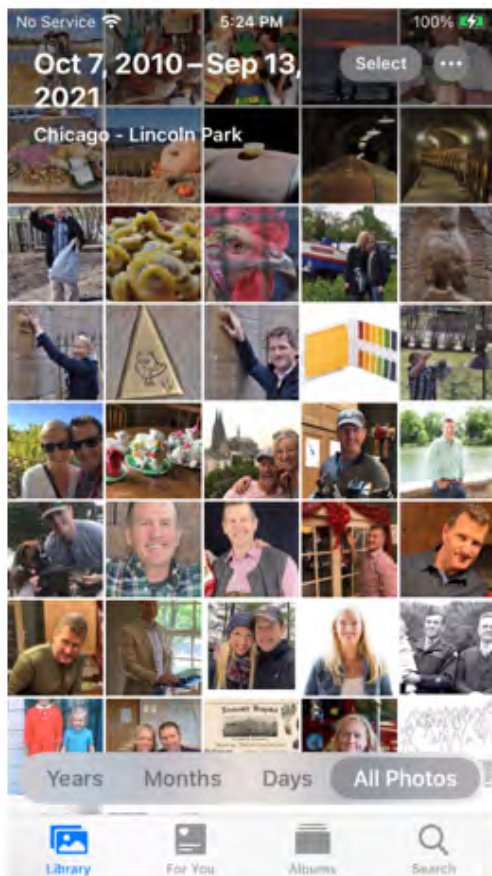
**U.S. Patent No. 9,552,376 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 9,552,376 (“the ‘376 patent”) in Apple iOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPhone 7 running iOS 14.7.1. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs, and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<b>I[pre]</b> A computer-implemented method of displaying digital files, comprising:	To the extent the preamble is limiting, iOS performs a computer-implemented method of displaying digital files, as set forth below.
<b>I[a]</b> storing, on one or more non-transitory computer-readable storage media, a plurality of digital files:	iOS stores, on one or more non-transitory computer-readable storage media, a plurality of digital files.

	
<p><b>1[a][i]</b> each of the digital files having embedded therein content data and metadata including tags, the content data including a digital photograph</p>	<p>Each of the digital files have, embedded therein, content data and metadata including tags. The content data includes a digital photograph or image or video. Exemplary content data (e.g., digital photograph, image, or video) is shown below.</p>

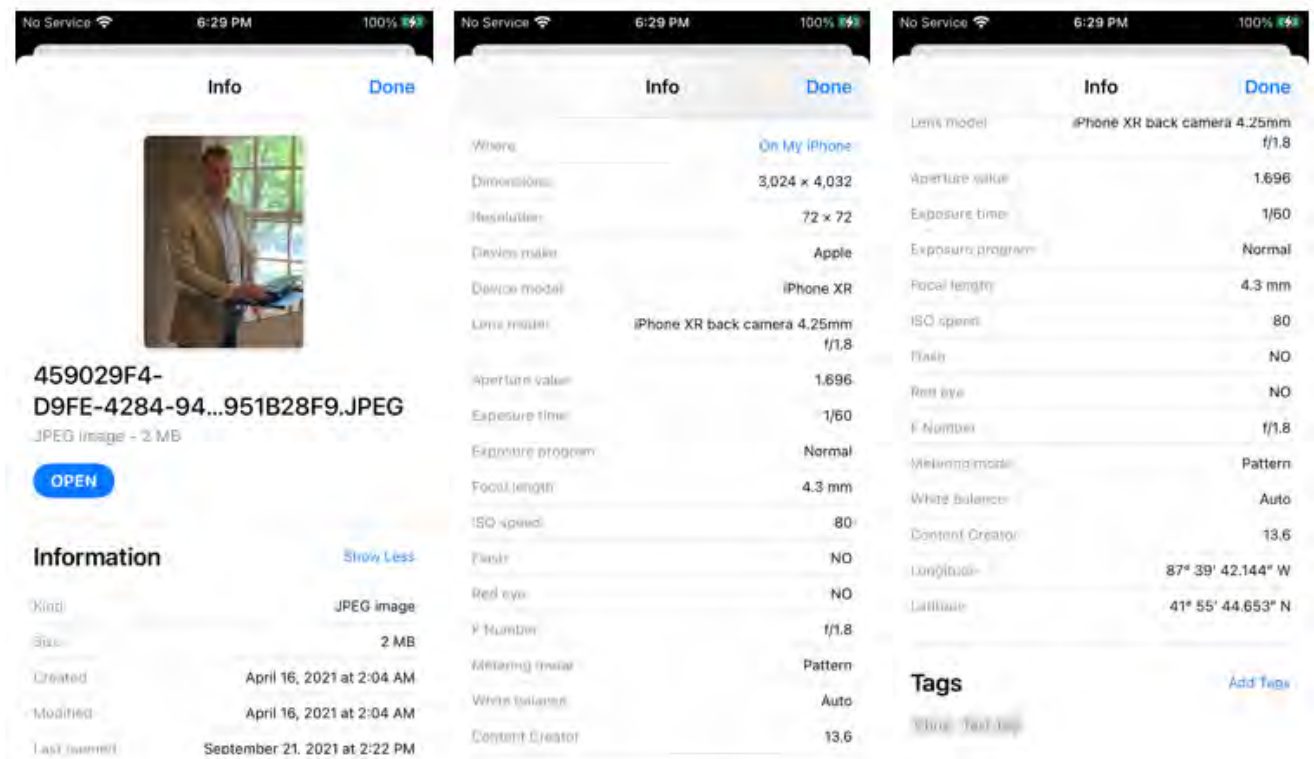
or image or video, the metadata including a geotag indicative of geographic coordinates where the digital photograph or image or video was taken;



The metadata includes a geotag indicative of geographic coordinates where the digital photograph or image or video was taken. For example, as shown below, exemplary metadata for one of the digital files is visible in iOS via the Files application. This metadata includes a geotag indicative of geographic coordinates where the digital photograph or image or video was taken.

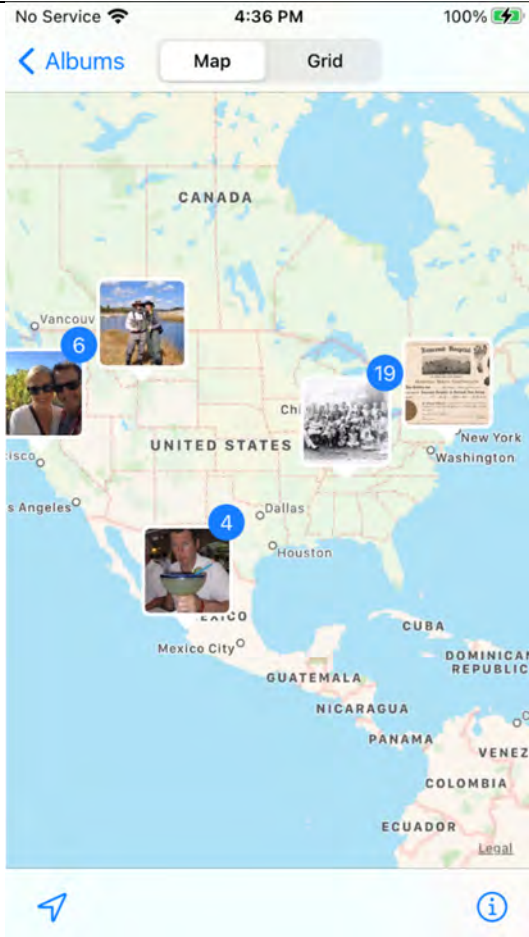


Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS

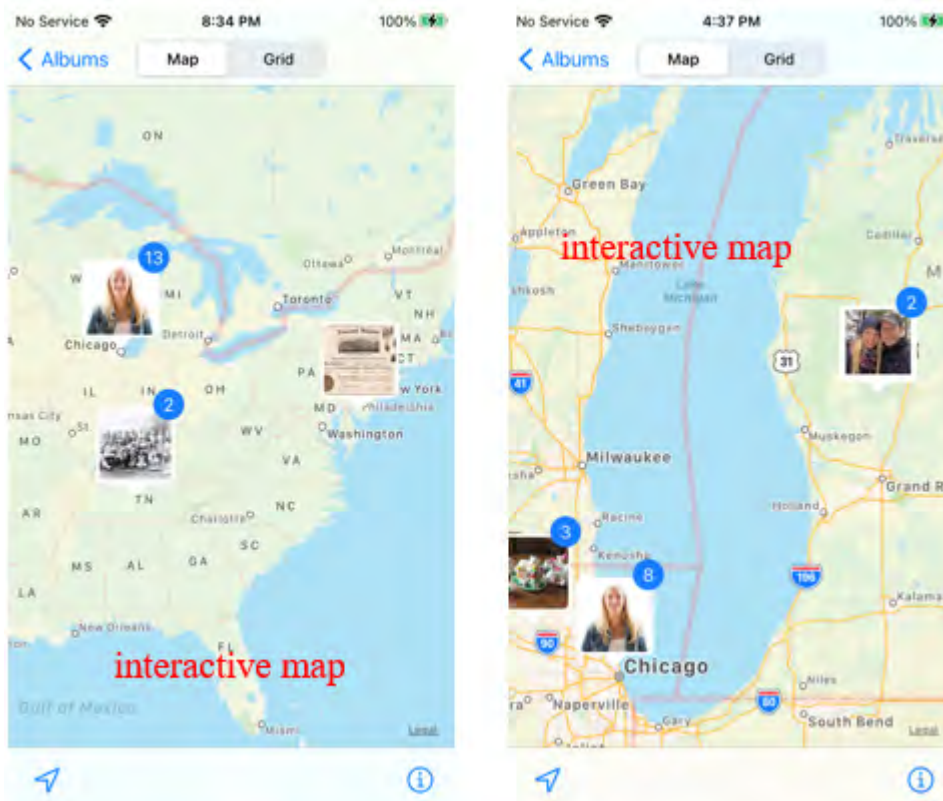


Additionally, the iOS Photos application can export metadata (which includes location information) that is embedded in a given digital file.

<p><b>1[b]</b> displaying a map view on a video display device, the displaying the map view including displaying:</p>	<p>iOS displays a map view on a video display device (e.g., an Apple iPhone).</p>

	 <p>The screenshot shows an iPhone map application interface. At the top, the status bar displays 'No Service', '4:36 PM', and '100%' battery. Below the status bar, there is a navigation bar with a back arrow and the word 'Albums', and two buttons labeled 'Map' and 'Grid'. The main area of the screen is a map of North America, showing Canada, the United States, and parts of Mexico and Central America. Several photo markers are overlaid on the map, each consisting of a small photo thumbnail and a blue circular badge with a white number. One marker is near Vancouver (number 6), another near Chicago (number 19), and a third near Dallas (number 4). The map also shows major cities like New York, Washington, Dallas, Houston, and Mexico City. At the bottom of the screen, there is a compass icon on the left and an information icon (i) on the right.</p>
<p><b>1[b][i]</b> (i) a representation of an interactive map, the representation of the interactive map comprising a majority portion of</p>	<p>iOS displays a representation of an interactive map. The map is interactive in that iOS can zoom in/out and/or move up, down, left, or right. The representation of the interactive map comprises a majority portion of a first screenshot of the video display device (e.g., Apple iPhone).</p>

a first screenshot of the video display device;

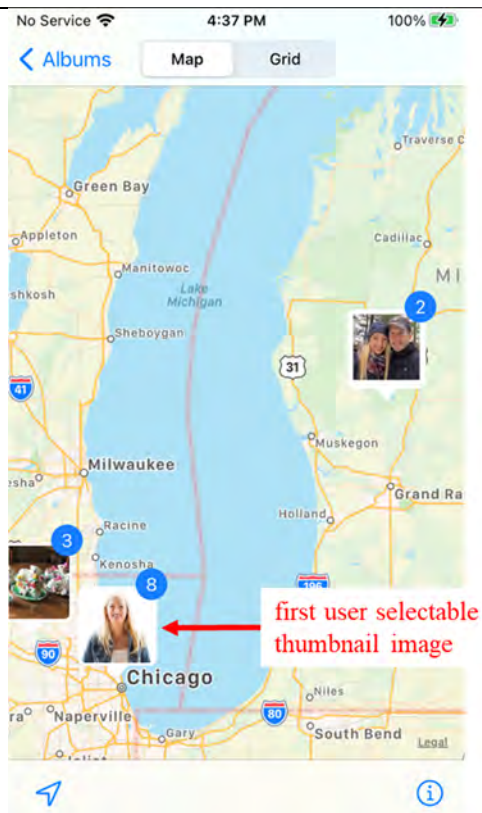


**1[b][ii]** (ii) a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic coordinates of a first geotag, a first

iOS displays a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic coordinates of a first geotag.

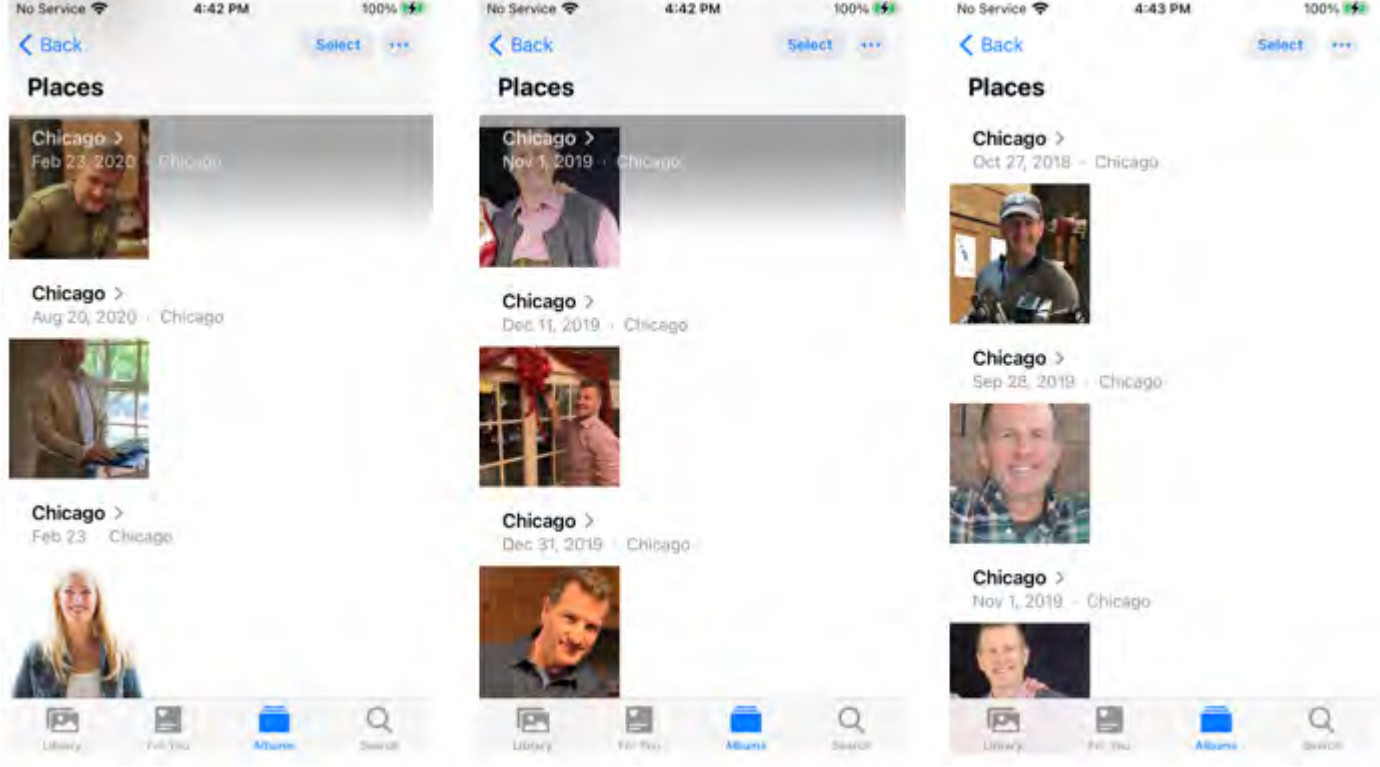
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS

set of digital files including all of the digital files having the first geotag;

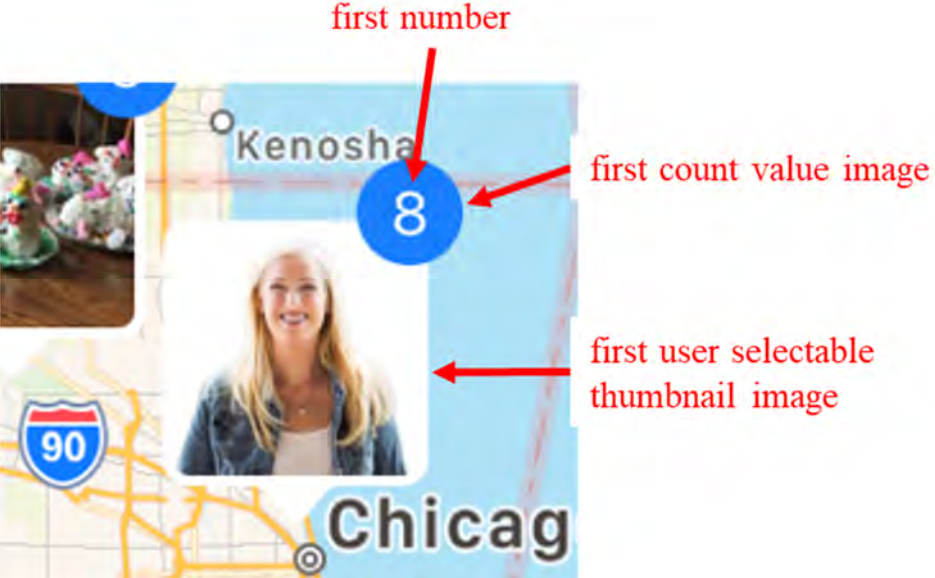


iOS stores a first set of digital files includes all of the digital files having the first geotag. *See also* information for limitation 1[a].

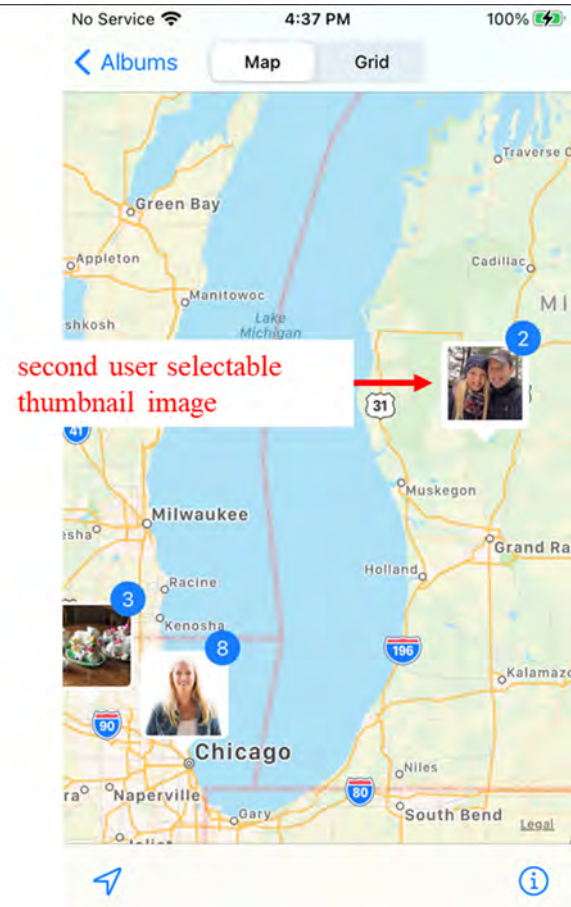
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS

	 <p>The image displays three side-by-side screenshots of the iOS 'Places' album view. Each screenshot shows a grid of photo thumbnails. The first thumbnail in each grid has a semi-transparent white box overlaid on its top-left corner, containing a date and the word 'Chicago'. The date is a count value: 'Feb 23, 2020' in the first, 'Nov 1, 2019' in the second, and 'Oct 27, 2018' in the third. The rest of the thumbnails are partially visible. The bottom dock of each screenshot shows icons for Library, Favorites, Albums, Search, and a magnifying glass.</p>
<p><b>1[b][iii]</b> (iii) a first count value image partially overlapping or directly connected to the first user selectable thumbnail image, the first count value image including a first</p>	<p>iOS displays a first count value image partially overlapping or directly connected to the first user selectable thumbnail image. The first count value image includes a first number that corresponds to the number of digital photographs or images or videos in the first set of digital files.</p>



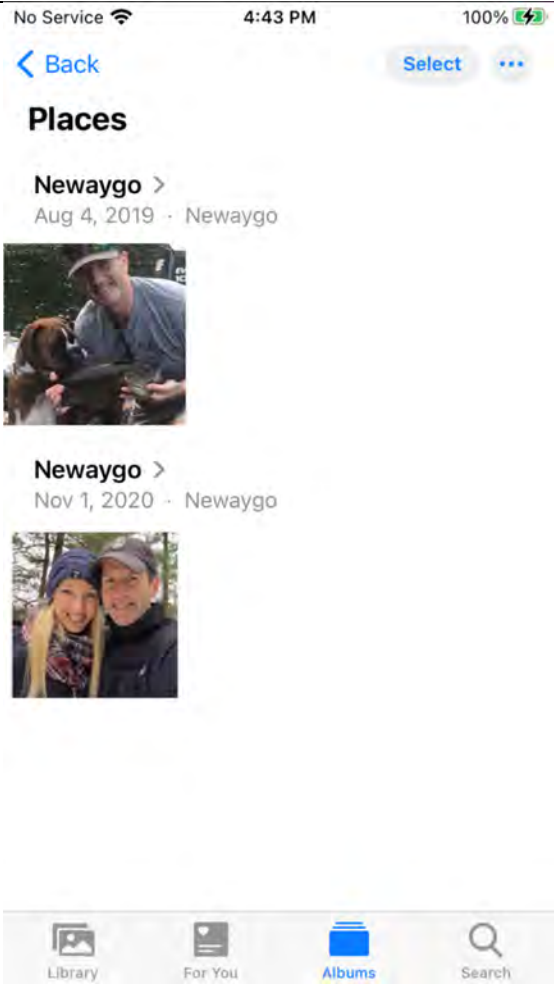
<p>number that corresponds to the number of digital photographs or images or videos in the first set of digital files;</p>	 <p>The image shows a screenshot of an interactive map interface. A blue circular geotag containing the number '8' is positioned over a location on the map. A red arrow points from the text 'first number' to the number '8'. Another red arrow points from the text 'first count value image' to the blue circle containing the number. A third red arrow points from the text 'first user selectable thumbnail image' to a white rectangular thumbnail image of a smiling woman with blonde hair. The map background shows a road network with labels for 'Kenosha' and 'Chicag', and a blue shield icon with the number '90'.</p>
<p><b>1[b][iv]</b> (iv) a second user selectable thumbnail image at a second location on the interactive map corresponding to the geographic coordinates of a second geotag, a second set of digital files including all of the digital files having</p>	<p>iOS displays a second user selectable thumbnail image at a second location on the interactive map corresponding to the geographic coordinates of a second geotag.</p>

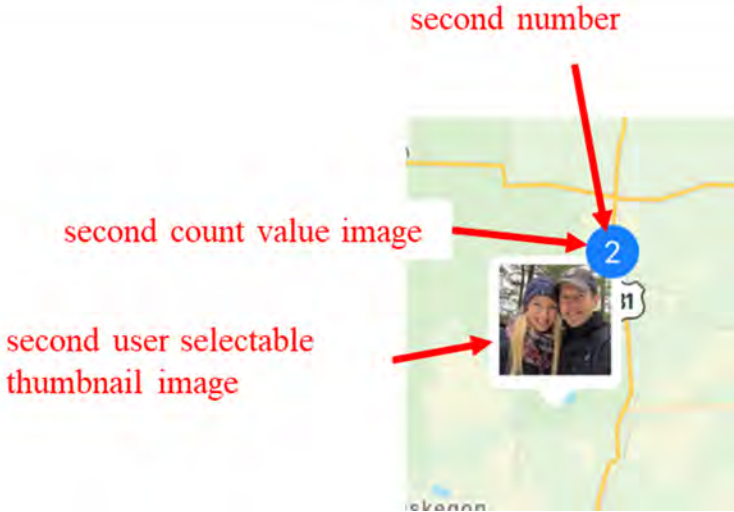
the second geotag;  
and

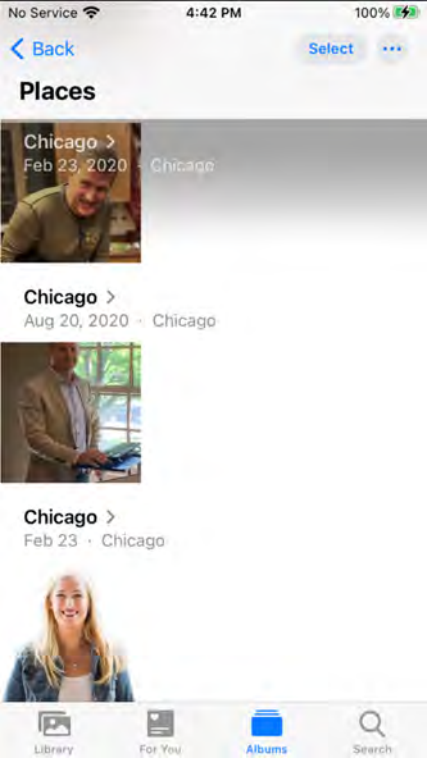


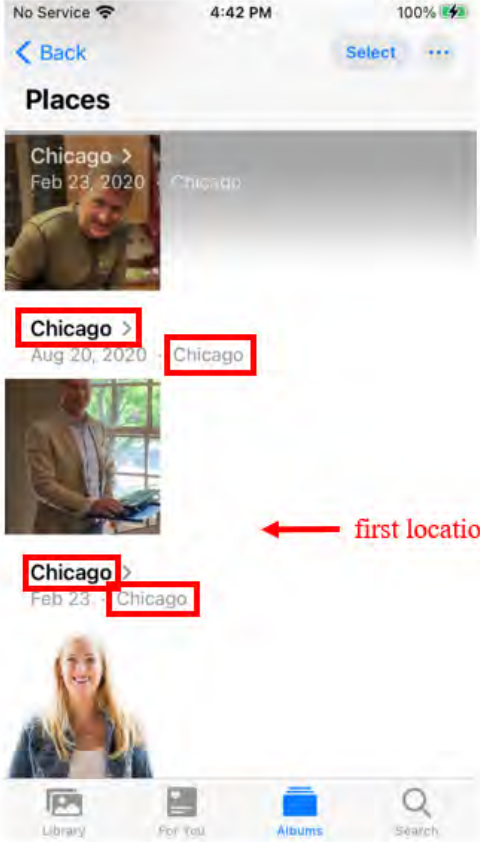
iOS stores a second set of digital files includes all of the digital files having the second geotag. *See also* information for limitation 1[a].

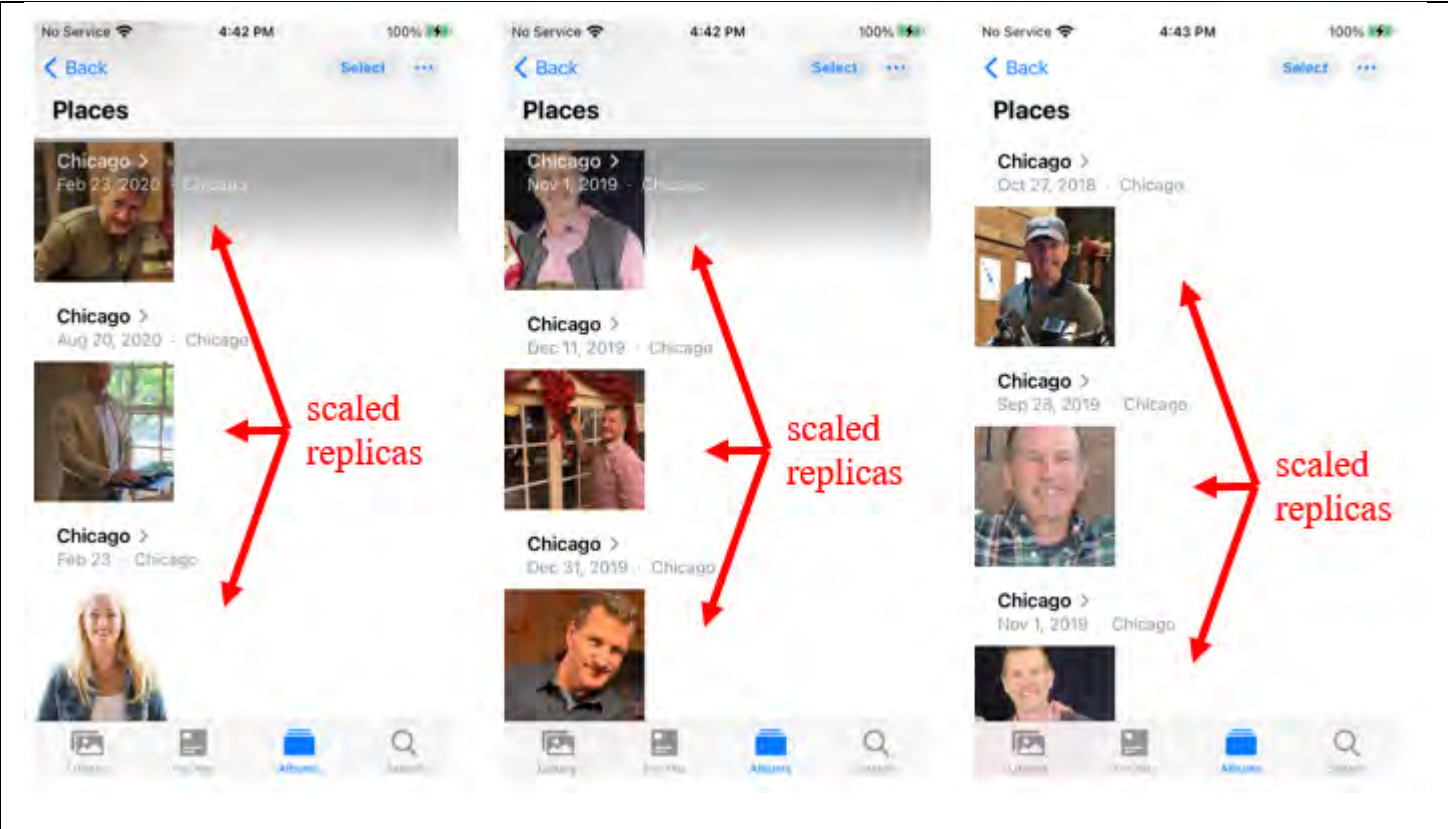


	 <p>The screenshot shows the 'Places' album in the Photos app. At the top, it says 'No Service', '4:43 PM', and '100%' battery. Below the title 'Places', there are two photo entries from 'Newaygo'. The first entry is dated 'Aug 4, 2019' and shows a man with a dog. The second entry is dated 'Nov 1, 2020' and shows a man and a woman. At the bottom, there are icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>1[b][v]</b> (v) a second count value image partially overlapping or directly connected to the second user</p>	<p>iOS displays a second count value image partially overlapping or directly connected to the second user selectable thumbnail image. The second count value image includes a second number that corresponds to the number of digital photographs or images or videos in the second set of digital files.</p>

<p>selectable thumbnail image, the second count value image including a second number that corresponds to the number of digital photographs or images or videos in the second set of digital files;</p>	
<p><b>I[c]</b> responsive to a click or tap of the first user selectable thumbnail image, displaying a first location view on the video display device, the first location view comprising a majority portion of a second screenshot of the video display device, the displaying the first location view</p>	<p>Responsive to a click or tap of the first user selectable thumbnail image, iOS displays a first location view on the video display device. The first location view comprises a majority portion of a second screenshot of the video display device (e.g., Apple iPhone).</p>

<p>including displaying</p>	 <p>The screenshot shows the 'Places' section of the Photos app. It displays three photo thumbnails, each with a location tag 'Chicago' and a date: 'Feb 23, 2020', 'Aug 20, 2020', and 'Feb 23'. The interface includes a 'Back' button, a 'Select' button, and a bottom navigation bar with icons for Library, For You, Albums, and Search.</p>
<p><b>1[c]i</b> (i) a first location name corresponding to the first geotag,</p>	<p>iOS displays a first location name corresponding to the first geotag.</p>

	 <p>The screenshot shows the 'Places' section of the Photos app. It displays a grid of photos. The first photo is a man's face, with a red box around the text 'Chicago &gt;' and 'Chicago'. The second photo is a man at a computer, with a red box around the text 'Chicago &gt;' and 'Chicago'. The third photo is a woman's face, with a red box around the text 'Chicago &gt;' and 'Chicago'. A red arrow points to the first 'Chicago &gt;' label with the text 'first location name'.</p>
<p><b>1[c][ii]</b> (ii) a scaled replica of each of the digital photographs or images or videos in the first set of digital files, and</p>	<p>iOS displays a scaled replica of each of the digital photographs or images or videos in the first set of digital files.</p>

	 <p>The image displays three side-by-side screenshots of the iOS 'Places' app interface. Each screenshot shows a list of geotags for 'Chicago' with associated photos and dates. Red arrows point from the text 'scaled replicas' to the geotag images in each screenshot.</p> <ul style="list-style-type: none"><li><b>Left Screenshot:</b> Shows three geotags for Chicago with dates Feb 23, 2020, Aug 20, 2020, and Feb 23, Chicago. A red arrow points from the text 'scaled replicas' to the geotag images.</li><li><b>Middle Screenshot:</b> Shows three geotags for Chicago with dates Nov 1, 2019, Dec 11, 2019, and Dec 31, 2019. A red arrow points from the text 'scaled replicas' to the geotag images.</li><li><b>Right Screenshot:</b> Shows four geotags for Chicago with dates Oct 27, 2018, Sep 28, 2019, and Nov 1, 2019. A red arrow points from the text 'scaled replicas' to the geotag images.</li></ul>
<p><b>1[c][iii]</b> (iii) a first map image indicating the geographic coordinates of the first geotag,</p>	<p>iOS displays a first map image indicating the geographic coordinates of the first geotag.</p>

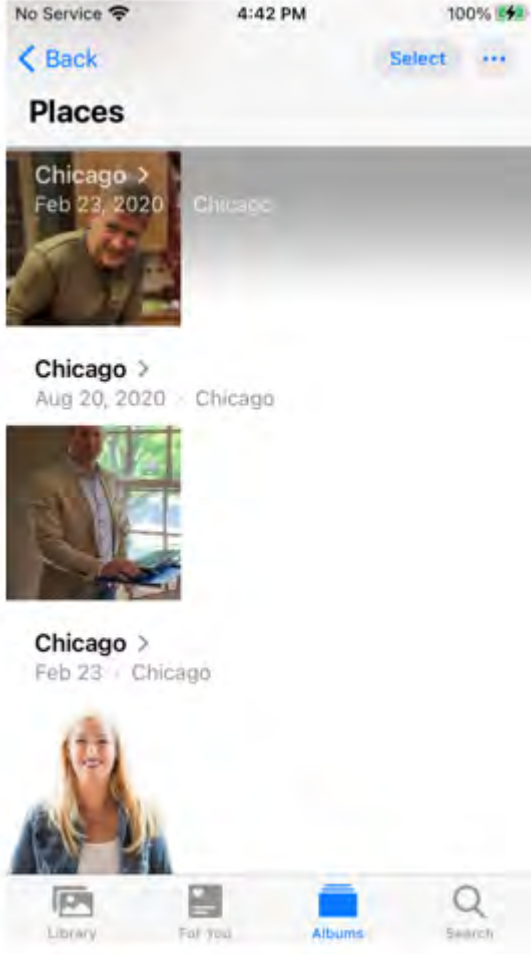
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS

<p><b>1[c][iv]</b> the displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files not being overlaid on the first map image and</p>	<p>The displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files are not overlaid on the first map image.</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS

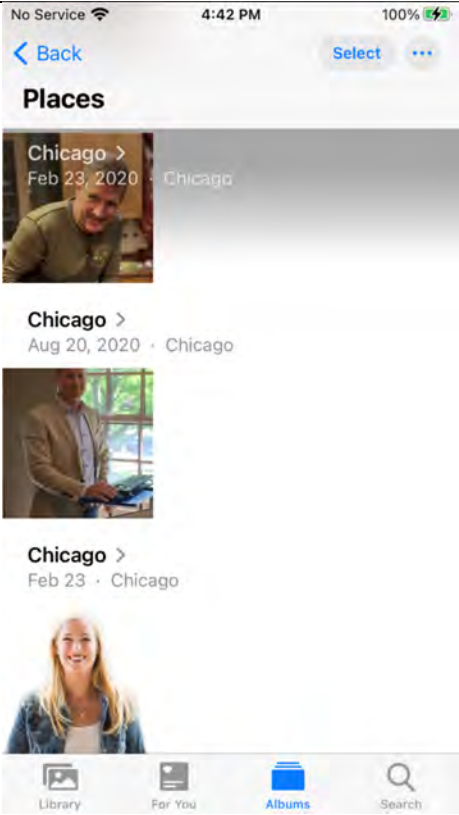
	<p>The image displays four sequential screenshots from an iPhone Photos app. The first three screenshots show a 'Places' view for 'Chicago' with a list of photos. Red arrows labeled 'scaled replicas' point to the photos in each of these three screenshots. The fourth screenshot shows a map view for 'Chicago - Lincoln Park' with a red arrow labeled 'first map image' pointing to a photo on the map.</p>
<p><b>1[c][v]</b> the second screenshot of the video display device not including the interactive map; and</p>	<p>The second screenshot of the video display device does not include the interactive map.</p>




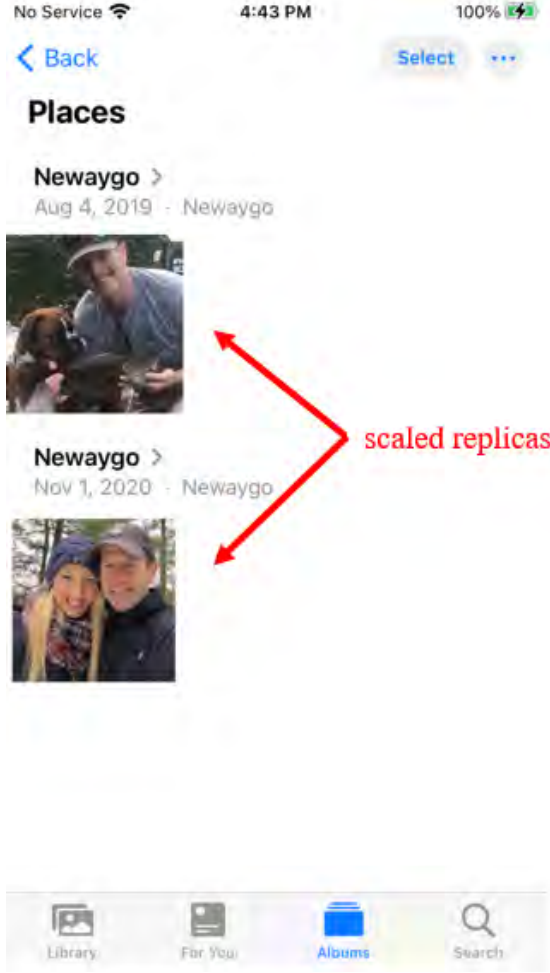
	
<p><b>1[d]</b> responsive to a click or tap of the second user selectable thumbnail image, displaying a</p>	<p>Responsive to a click or tap of the second user selectable thumbnail image, iOS displays a second location view on the video display device. The second location view comprises a majority portion of a third screenshot of the video display device (e.g., Apple iPhone).</p>



Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS

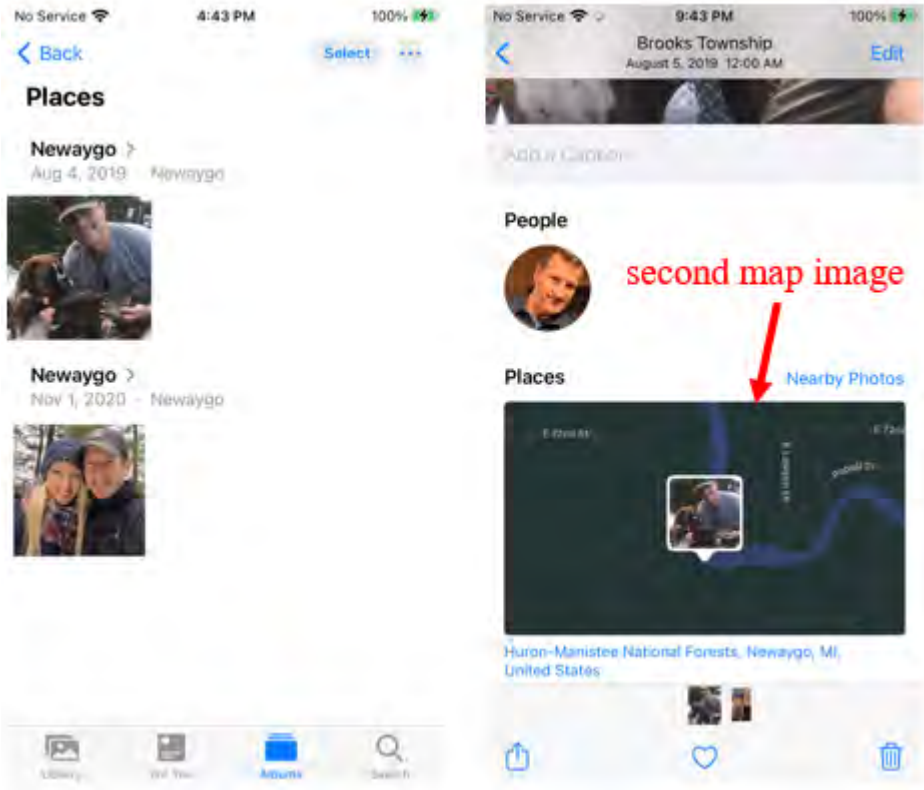
<p>second location view on the video display device, the second location view comprising a majority portion of a third screenshot of the video display device, the displaying the second location view including displaying</p>	 <p>The screenshot shows an iPhone interface with a 'Places' album. It contains three photos, each with a location tag 'Chicago' and a date: 'Feb 23, 2020', 'Aug 20, 2020', and 'Feb 23'. The bottom dock shows 'Library', 'For You', 'Albums', and 'Search' icons.</p>
<p><b>1[d][i]</b> (i) a second location name corresponding to the second geotag,</p>	<p>iOS displays a second location name corresponding to the second geotag.</p>

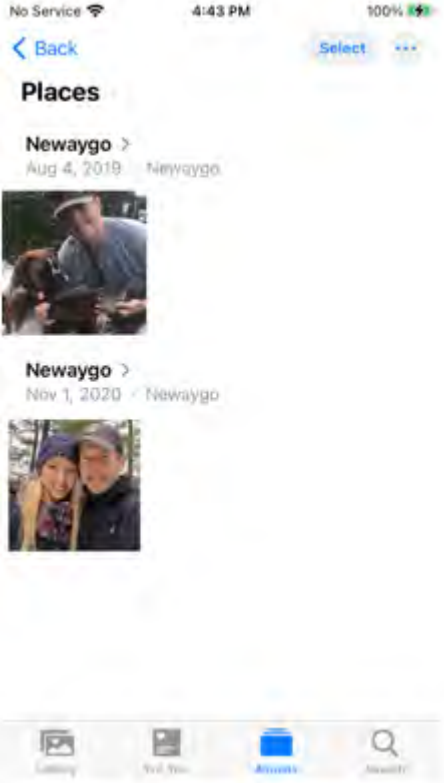
	 <p>The screenshot shows the 'Places' section of the Photos app. It lists two photos, both with the location 'Newwaygo'. The first photo is from August 4, 2019, and the second is from November 1, 2020. Red boxes highlight the 'Newwaygo' text in both photos. A red arrow points to the second 'Newwaygo' tag with the text 'second location name'.</p>
<p><b>1[d][ii]</b> (ii) a scaled replica of each of the digital photographs or images or videos in the second set of digital files, and</p>	<p>iOS displays a scaled replica of each of the digital photographs or images or videos in the second set of digital files.</p>

	 <p>The screenshot shows the 'Places' section of the Photos app. Two photos are listed, both from the location 'Newwaygo'. The first photo is dated 'Aug 4, 2019' and shows a man with a dog. The second photo is dated 'Nov 1, 2020' and shows a man and a woman. Two red arrows originate from the text 'scaled replicas' on the right and point to the two photos, indicating they are scaled versions of each other.</p>
<p><b>1[d][iii]</b> (iii) a second map image indicating the geographic coordinates of the second geotag,</p>	<p>iOS displays a second map image indicating the geographic coordinates of the second geotag.</p>

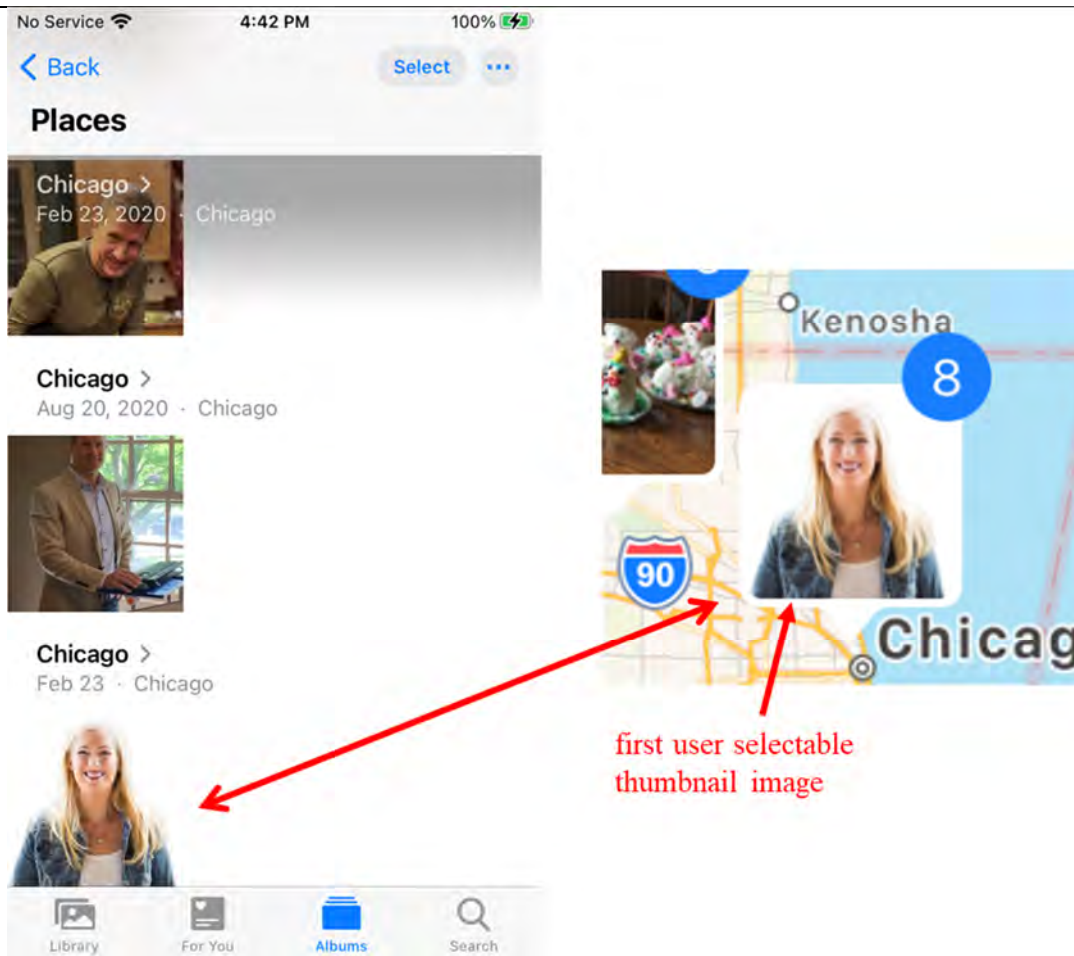
<p><b>1[d][iv]</b> the displayed scaled replicas of each of the digital photographs or images or videos in the second set of digital files not being overlaid on the second map image and</p>	<p>The displayed scaled replicas of each of the digital photographs or images or videos in the second set of digital files are not overlaid on the second map image.</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS

	 <p>The image contains two screenshots from an iPhone Photos app. The left screenshot shows a 'Places' album with two photos of a man and a dog. The right screenshot shows a 'Nearby Photos' map view with a red arrow pointing to a photo on a map, labeled 'second map image'.</p>
<p><b>1[d][v]</b> the third screenshot of the video display device not including the interactive map.</p>	<p>The third screenshot of the video display device does not include the interactive map.</p>

	
<p><b>2[pre]</b> The computer-implemented method of claim 1, wherein</p>	<p><i>See information for claim 1.</i></p>
<p><b>2[a]</b> the first user selectable thumbnail image includes a scaled</p>	<p>The first user selectable thumbnail image includes a scaled representation of at least one of the digital images in the first set of digital files.</p>

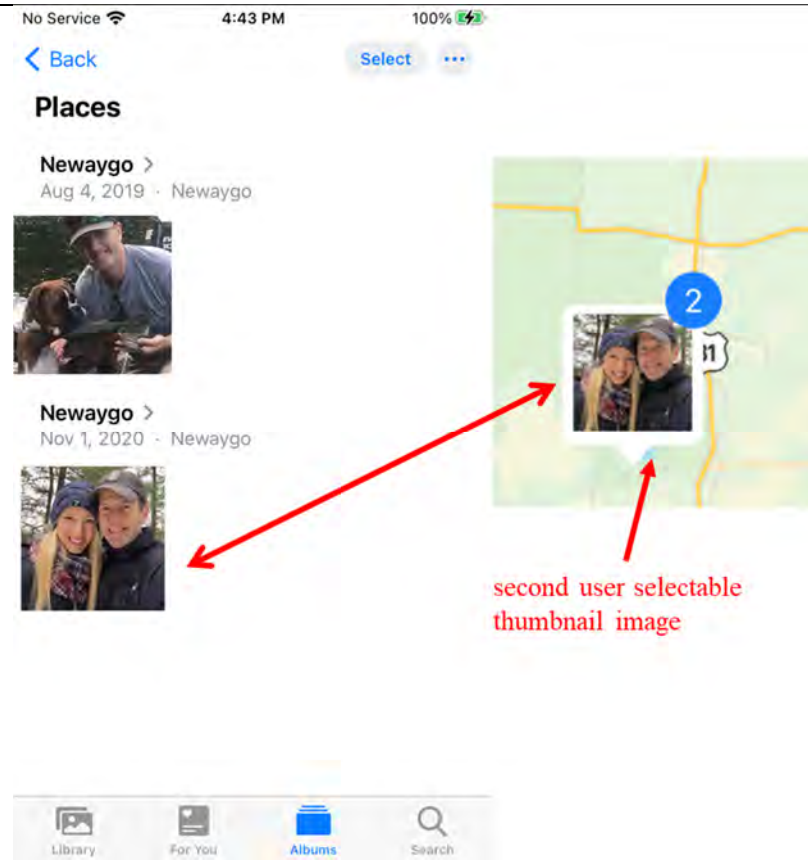
representation of at least one of the digital images in the first set of digital files, and



2[b] wherein the second user selectable thumbnail image includes a scaled representation of at least one of the

The second user selectable thumbnail image includes a scaled representation of at least one of the digital images in the second set of digital files.

digital images in the second set of digital files.





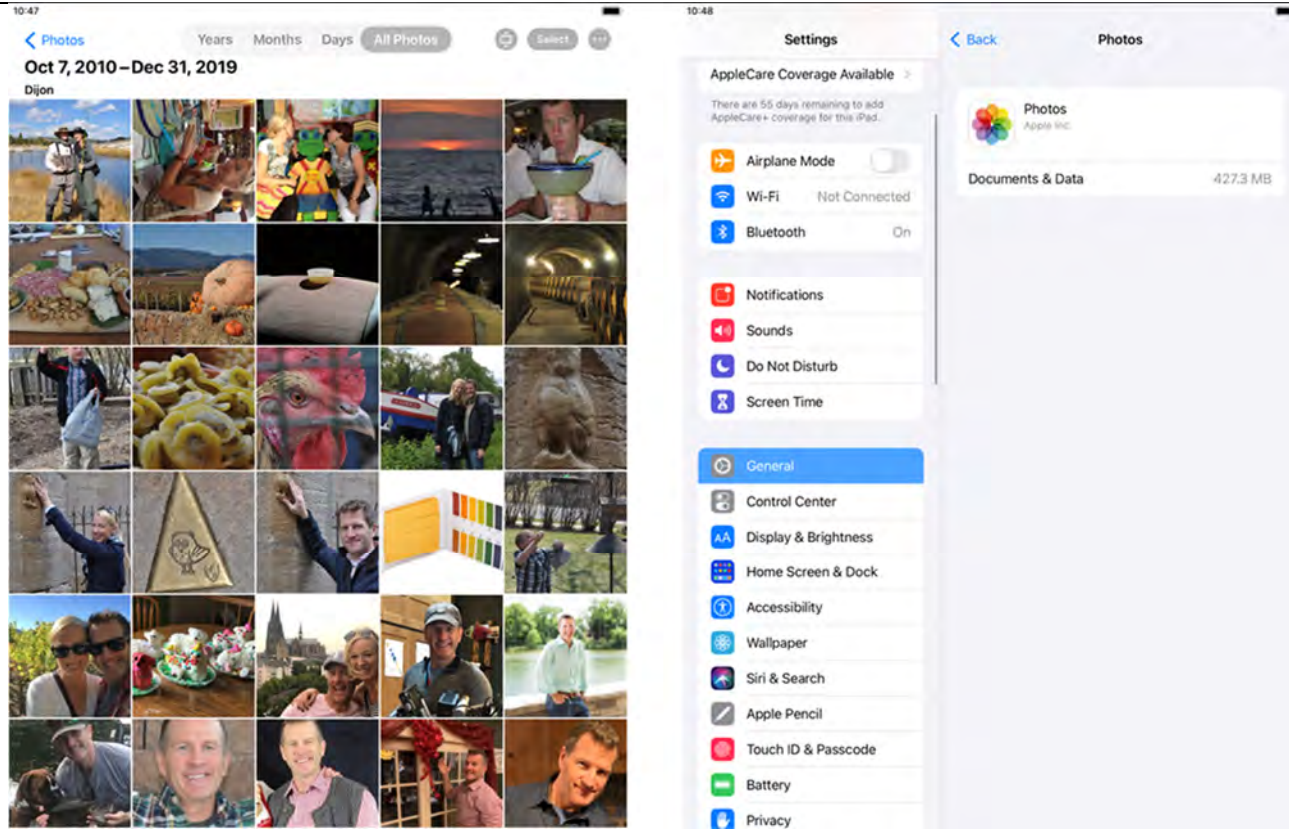
# **Exhibit A.2**

**U.S. Patent No. 9,552,376 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 9,552,376 (“the ‘376 patent”) in Apple iPadOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPad mini (5<sup>th</sup> Generation) running iPadOS 14.6 (“iPadOS 14”). While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs, and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<b>I[pre]</b> A computer-implemented method of displaying digital files, comprising:	To the extent the preamble is limiting, iPadOS performs a computer-implemented method of displaying digital files, as set forth below.
<b>I[a]</b> storing, on one or more non-transitory computer-readable storage media, a plurality of digital files:	iPadOS stores, on one or more non-transitory computer-readable storage media, a plurality of digital files.

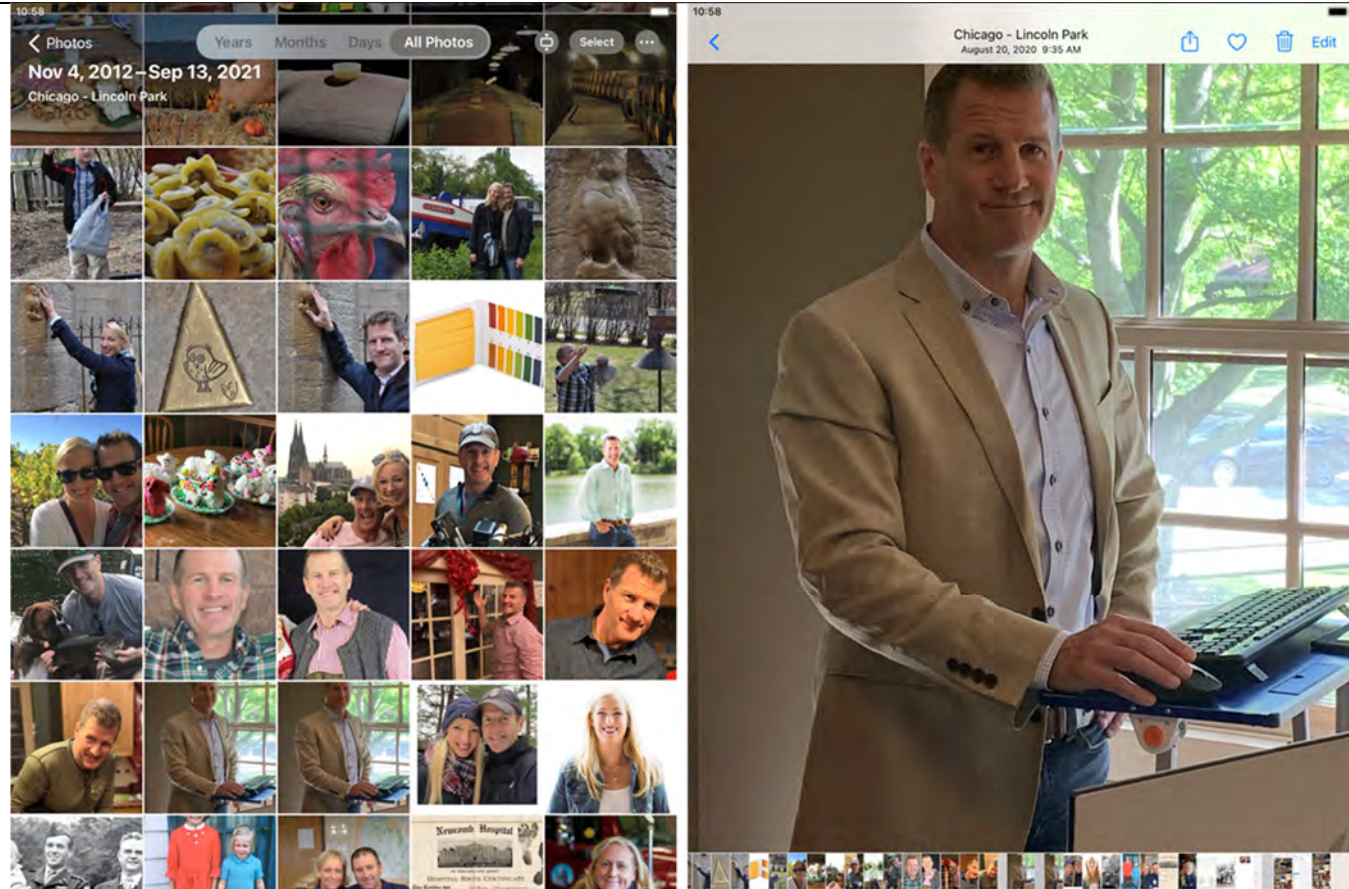
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS



**1[a][i]** each of the digital files having embedded therein content data and metadata including tags, the content data including a digital photograph or image or video, the metadata

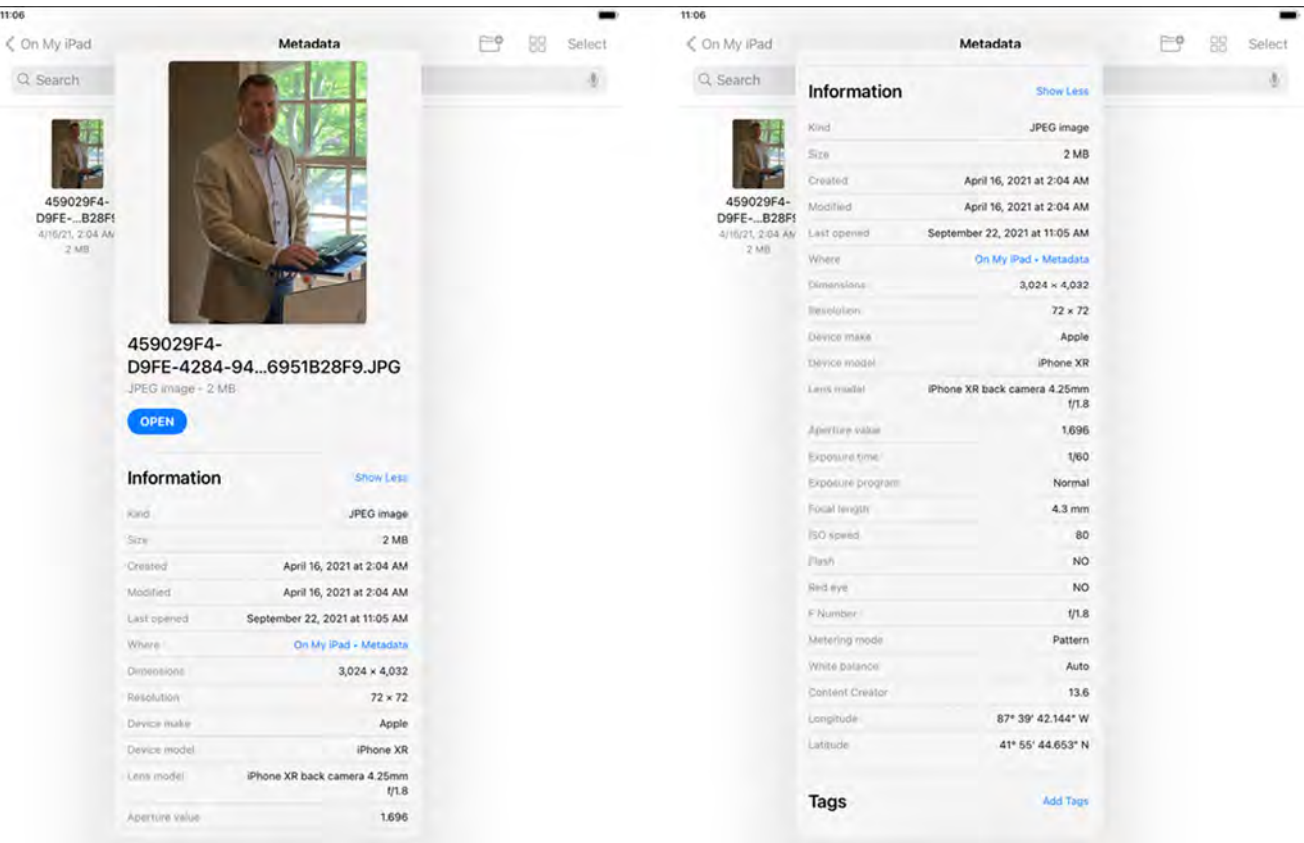
Each of the digital files have, embedded therein, content data and metadata including tags. The content data includes a digital photograph or image or video. Exemplary content data (e.g., digital photograph, image, or video) is shown below.

including a geotag indicative of geographic coordinates where the digital photograph or image or video was taken;



The metadata includes a geotag indicative of geographic coordinates where the digital photograph or image or video was taken. For example, as shown below, exemplary metadata for one of the digital files is visible in iPadOS via the Files application. This metadata includes a geotag indicative of geographic coordinates where the digital photograph or image or video was taken.

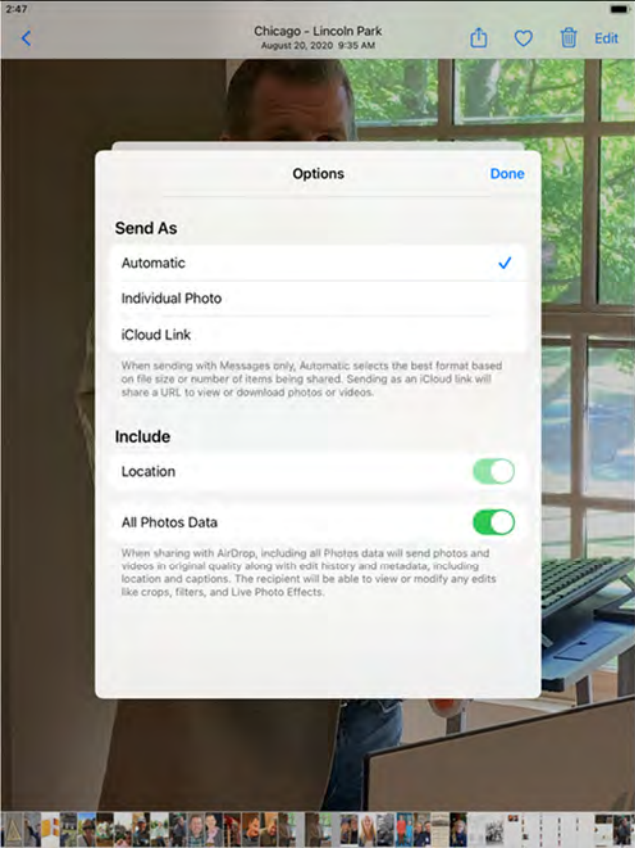
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS

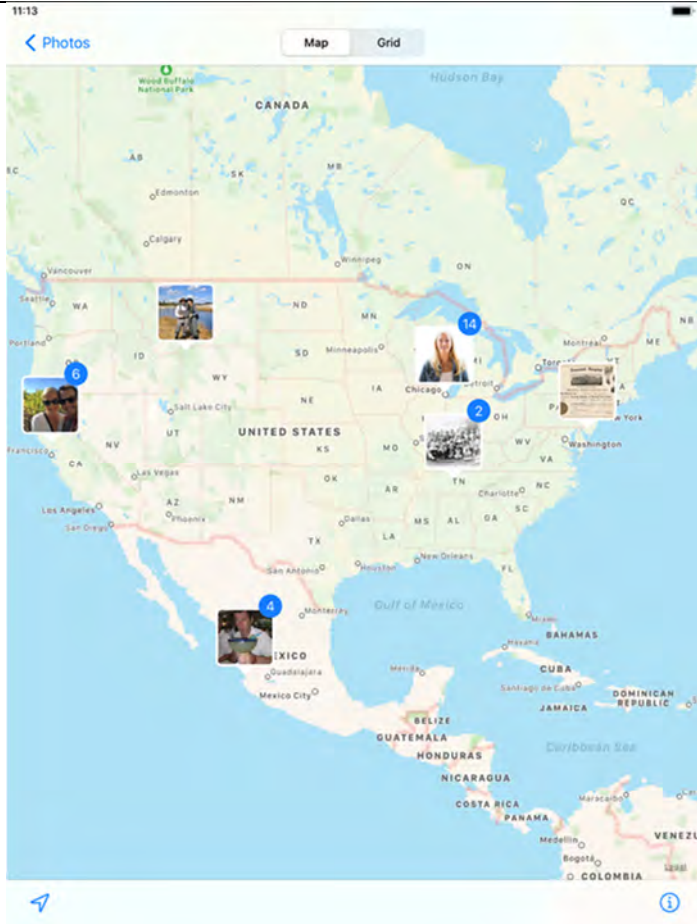


Additionally, the iPadOS Photos application can export metadata (which includes location information) that is embedded in a given digital file.



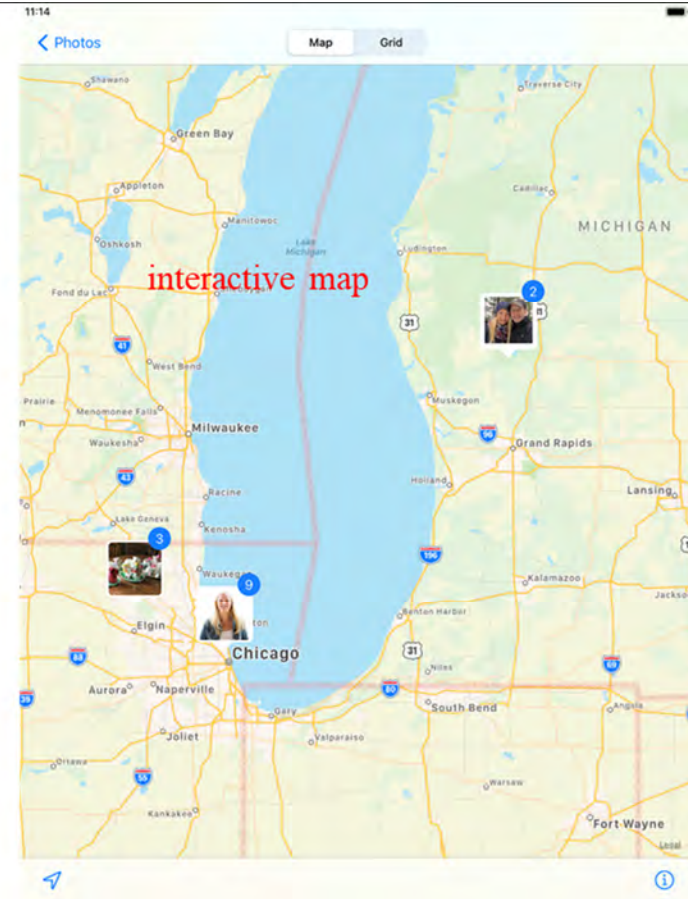
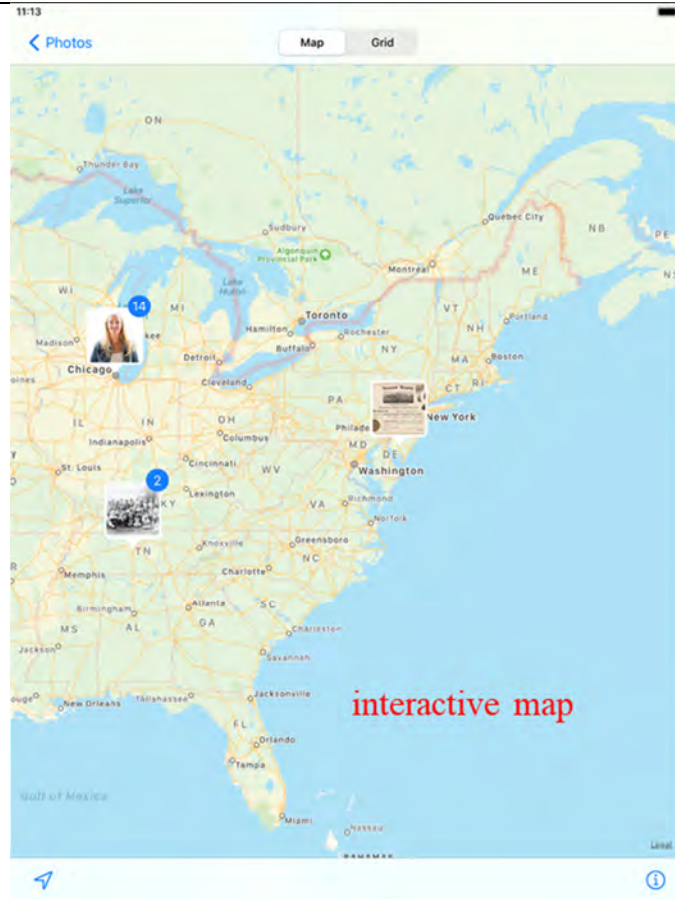
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS

	 <p>When sharing with AirDrop, including all Photos data will send photos and videos in original quality along with edit history and metadata, including location and captions. The recipient will be able to view or modify any edits like crops, filters, and Live Photo Effects.</p>
<p><b>1[b]</b> displaying a map view on a video display device, the displaying the map view including displaying:</p>	<p>iPadOS displays a map view on a video display device (e.g., an Apple iPad).</p>

	 <p>The screenshot shows the Photos app interface on an iPad. At the top, there is a status bar with the time 11:13 and a battery icon. Below it, a navigation bar contains a back arrow labeled 'Photos' and two tabs: 'Map' (selected) and 'Grid'. The main area is a map of North America, including parts of Canada, the United States, and Mexico. Several photo thumbnails are overlaid on the map, each with a blue circular icon containing a number: '6' near Vancouver, '14' near Chicago, '2' near Detroit, and '4' near Mexico City. A blue arrow cursor is visible at the bottom left of the map area, and an information icon is at the bottom right.</p>
<p><b>1[b][i]</b> (i) a representation of an interactive map, the representation of the interactive map comprising a majority portion of</p>	<p>iPadOS displays a representation of an interactive map. The map is interactive in that iPadOS can zoom in/out and/or move up, down, left, or right. The representation of the interactive map comprises a majority portion of a first screenshot of the video display device (e.g., Apple iPad).</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS

a first screenshot of the video display device;

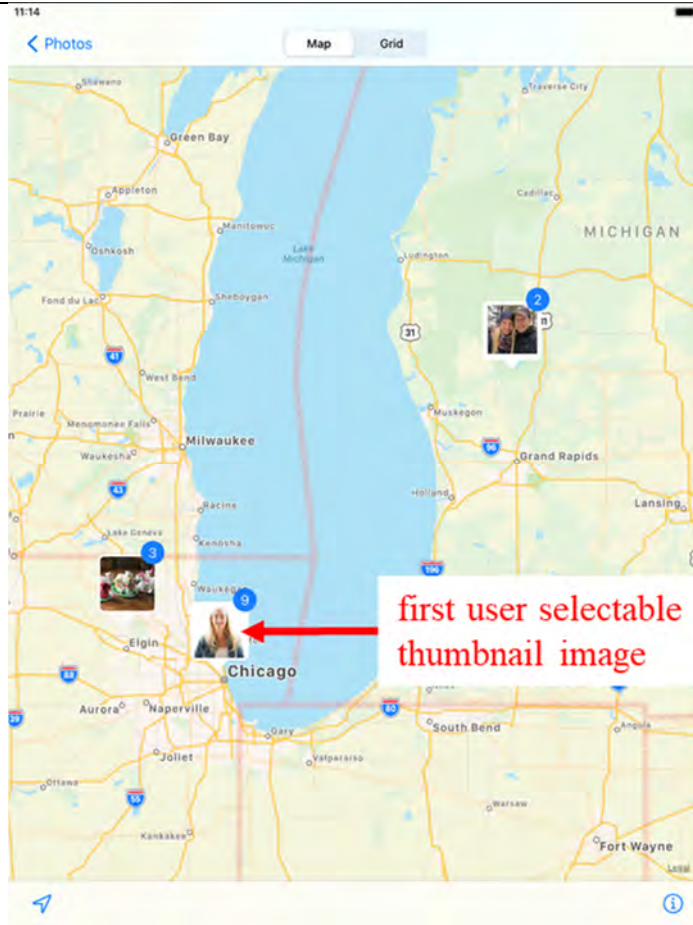


**1[b][ii]** (ii) a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic

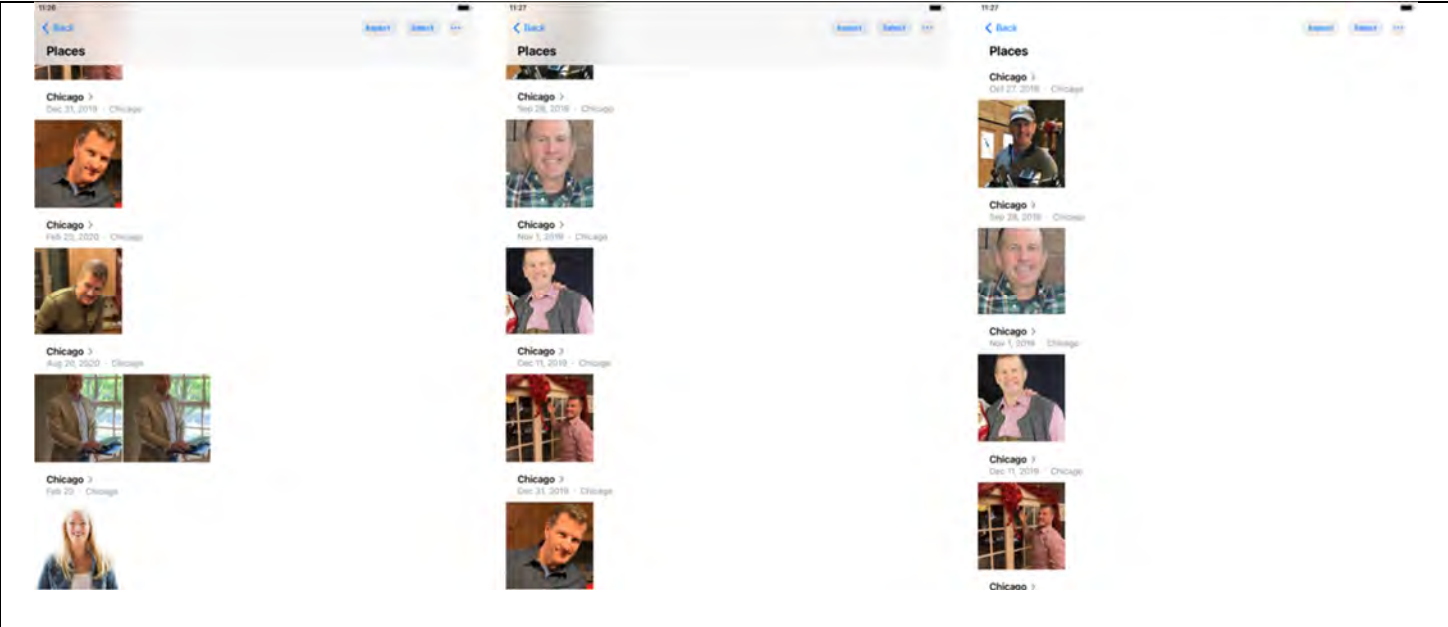
iPadOS displays a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic coordinates of a first geotag.

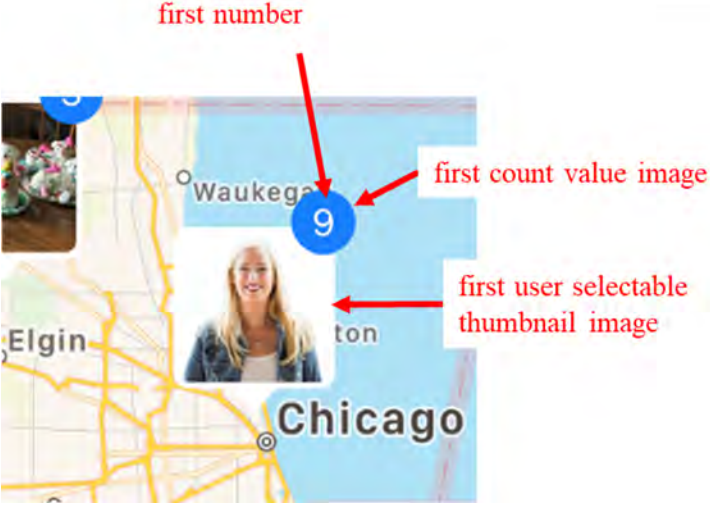


coordinates of a first geotag, a first set of digital files including all of the digital files having the first geotag;

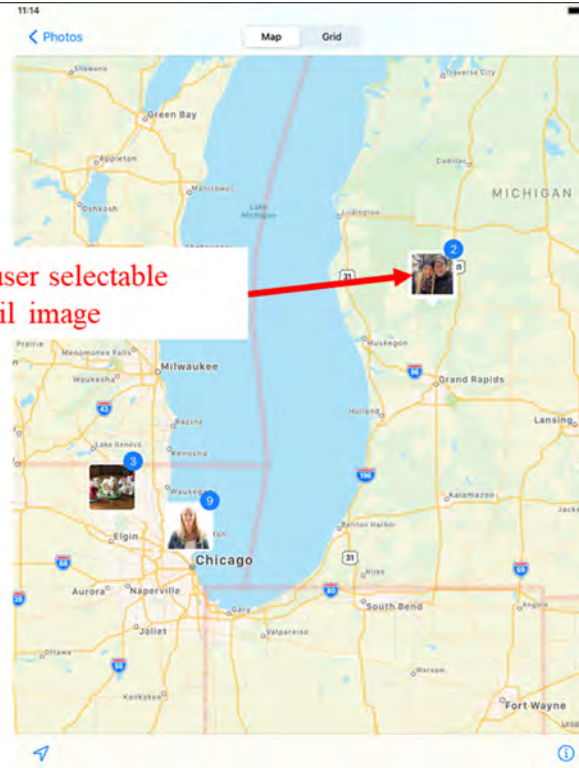


iPadOS stores a first set of digital files includes all of the digital files having the first geotag. *See also* information for limitation 1[a].

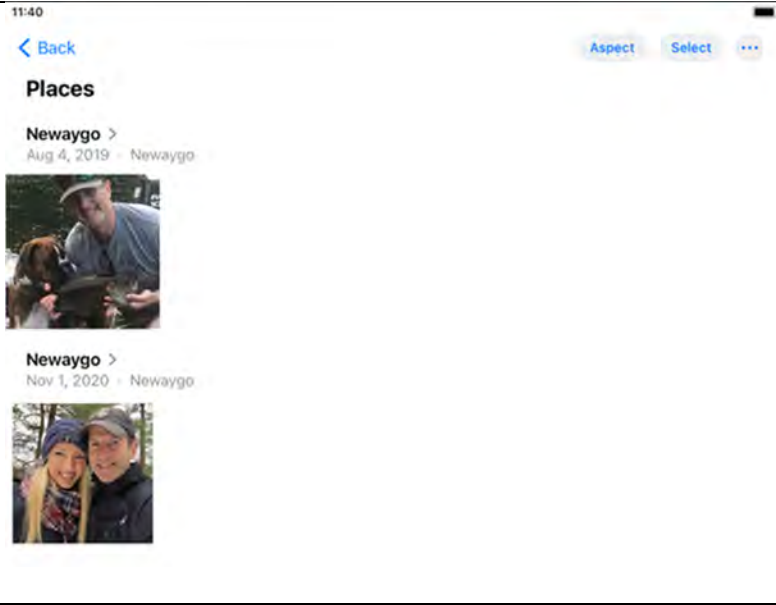
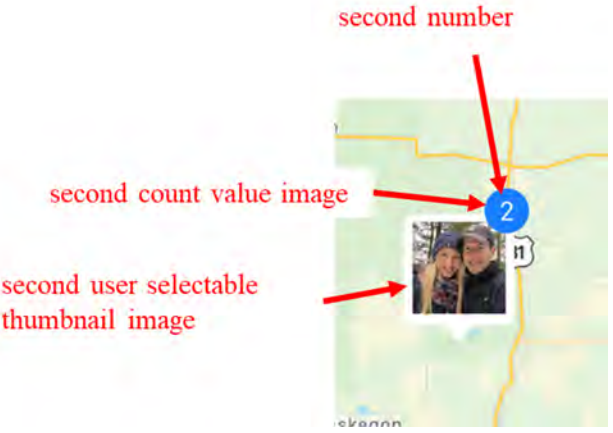
	 <p>The image displays three screenshots of the iPadOS 'Places' gallery interface. Each screenshot shows a list of photo thumbnails for a location named 'Chicago'. The thumbnails are arranged in a grid. In the first screenshot (left), a count of '1' is overlaid on the top-left thumbnail. In the second screenshot (middle), a count of '2' is overlaid on the top-left thumbnail. In the third screenshot (right), a count of '3' is overlaid on the top-left thumbnail. The interface includes a 'Back' button at the top left and 'Annotate', 'Select', and 'More' options at the top right.</p>
<p><b>1[b][iii]</b> (iii) a first count value image partially overlapping or directly connected to the first user selectable thumbnail image, the first count value image including a first number that corresponds to the number of digital photographs or images or videos</p>	<p>iPadOS displays a first count value image partially overlapping or directly connected to the first user selectable thumbnail image. The first count value image includes a first number that corresponds to the number of digital photographs or images or videos in the first set of digital files.</p>

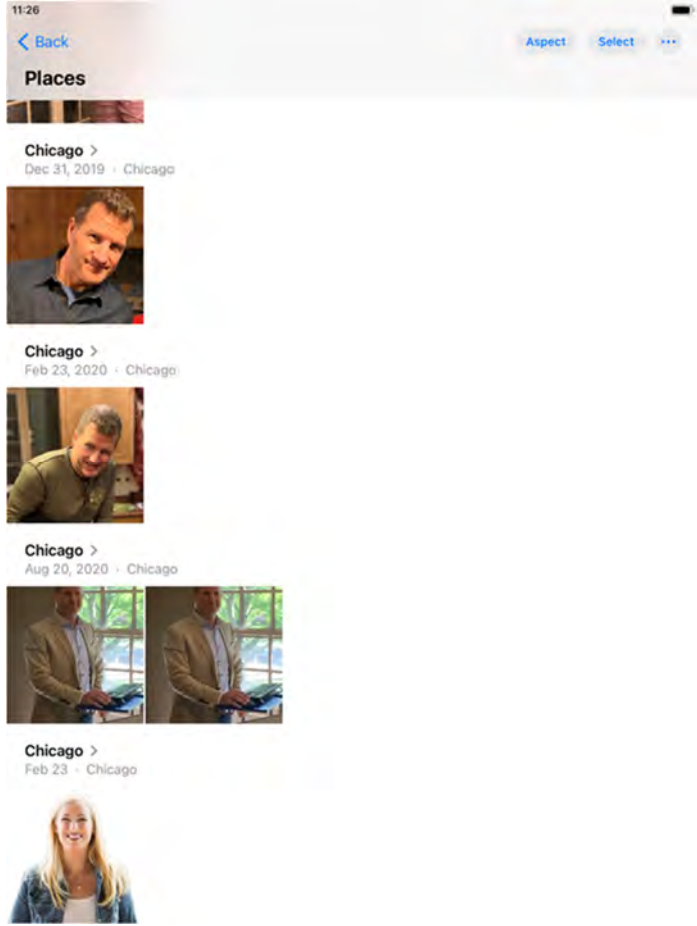
<p>in the first set of digital files;</p>	
<p><b>1[b][iv]</b> (iv) a second user selectable thumbnail image at a second location on the interactive map corresponding to the geographic coordinates of a second geotag, a second set of digital files including all of the digital files having the second geotag; and</p>	<p>iPadOS displays a second user selectable thumbnail image at a second location on the interactive map corresponding to the geographic coordinates of a second geotag.</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS



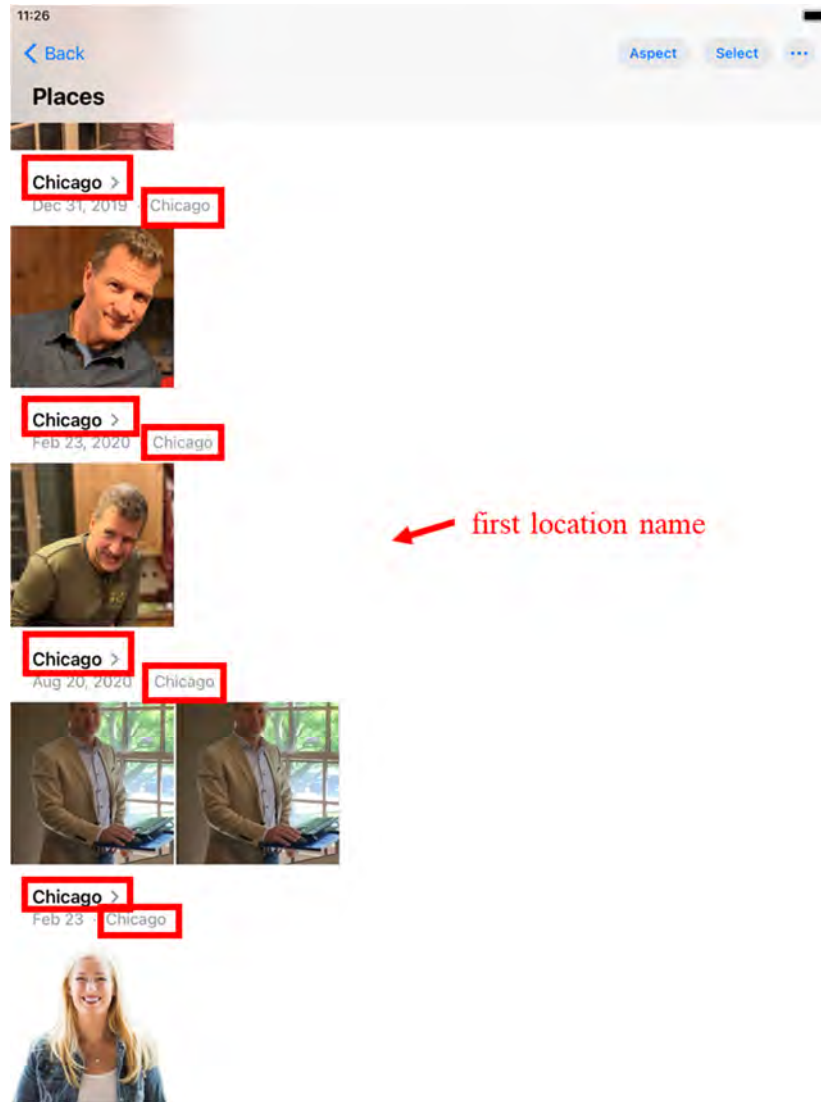
iPadOS stores a second set of digital files includes all of the digital files having the second geotag. *See also* information for limitation 1[a].

	 <p>The screenshot shows an iPadOS photo gallery interface. At the top, there is a status bar with the time 11:40 and battery level. Below that, a navigation bar contains a blue back arrow, the word 'Back', and three buttons: 'Aspect', 'Select', and a three-dot menu. The main content area is titled 'Places' and shows two photo thumbnails. The first thumbnail is labeled 'Newaygo &gt;' with the date 'Aug 4, 2019' and the name 'Newaygo'. The second thumbnail is also labeled 'Newaygo &gt;' with the date 'Nov 1, 2020' and the name 'Newaygo'.</p>
<p><b>1[b][v]</b> (v) a second count value image partially overlapping or directly connected to the second user selectable thumbnail image, the second count value image including a second number that corresponds to the number of digital photographs or images or videos in the second set of digital files.</p>	<p>iPadOS displays a second count value image partially overlapping or directly connected to the second user selectable thumbnail image. The second count value image includes a second number that corresponds to the number of digital photographs or images or videos in the second set of digital files.</p>  <p>The diagram shows a map with a red arrow pointing to a blue circle containing the number '2', labeled 'second number'. Another red arrow points to a small thumbnail image of a couple, labeled 'second user selectable thumbnail image'. A third red arrow points to the blue circle with the number '2', labeled 'second count value image'.</p>

<p>in the second set of digital files;</p>	
<p><b>I[c]</b> responsive to a click or tap of the first user selectable thumbnail image, displaying a first location view on the video display device, the first location view comprising a majority portion of a second screenshot of the video display device, the displaying the first location view including displaying</p>	<p>Responsive to a click or tap of the first user selectable thumbnail image, iPadOS displays a first location view on the video display device. The first location view comprises a majority portion of a second screenshot of the video display device (e.g., Apple iPad).</p>  <p>The screenshot shows an iPadOS interface with a 'Places' gallery. At the top, there is a navigation bar with a 'Back' button on the left and 'Aspect', 'Select', and a menu icon on the right. Below the title, there are several photo thumbnails. The first thumbnail is a portrait of a man, with the caption 'Chicago &gt; Dec 31, 2019 · Chicago'. The second thumbnail is another portrait of the same man, with the caption 'Chicago &gt; Feb 23, 2020 · Chicago'. The third thumbnail shows the man in a different setting, with the caption 'Chicago &gt; Aug 20, 2020 · Chicago'. The fourth thumbnail is a pair of photos showing the man in a suit, with the caption 'Chicago &gt; Feb 23 · Chicago'. The fifth thumbnail is a portrait of a woman.</p>

**1[c][i]** (i) a first location name corresponding to the first geotag,

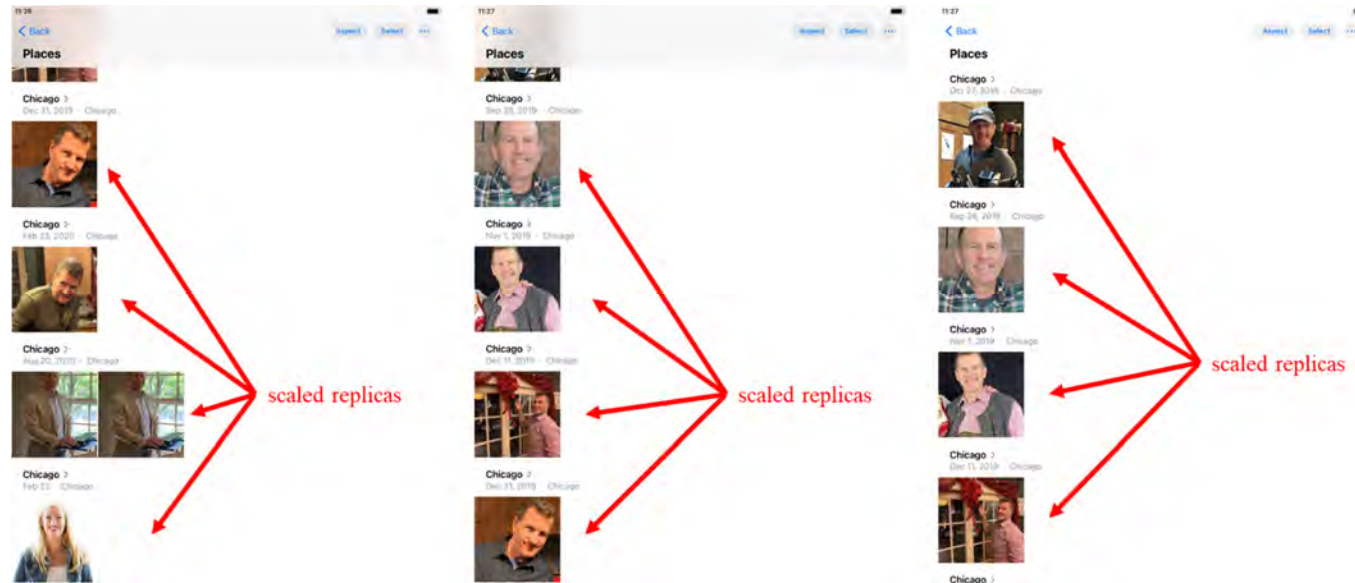
iPadOS displays a first location name corresponding to the first geotag.





**1[c][ii]** (ii) a scaled replica of each of the digital photographs or images or videos in the first set of digital files, and

iPadOS displays a scaled replica of each of the digital photographs or images or videos in the first set of digital files.

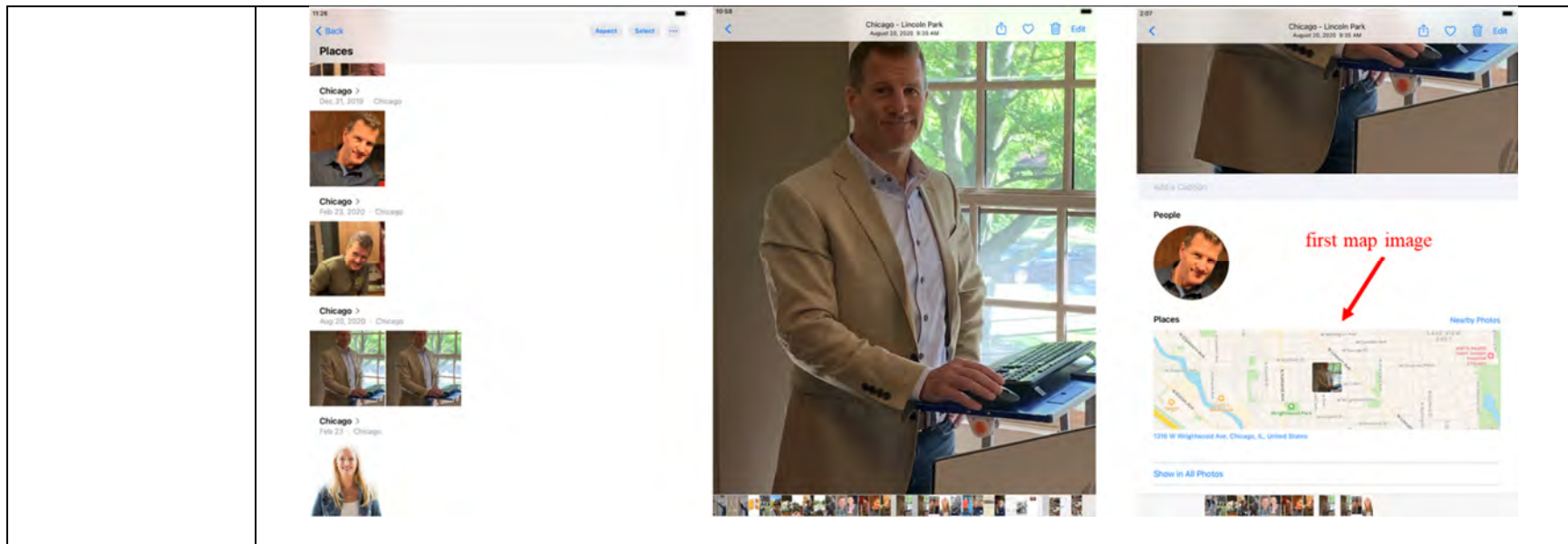


**1[c][iii]** (iii) a first map image indicating the geographic coordinates of the first geotag,

iPadOS displays a first map image indicating the geographic coordinates of the first geotag.

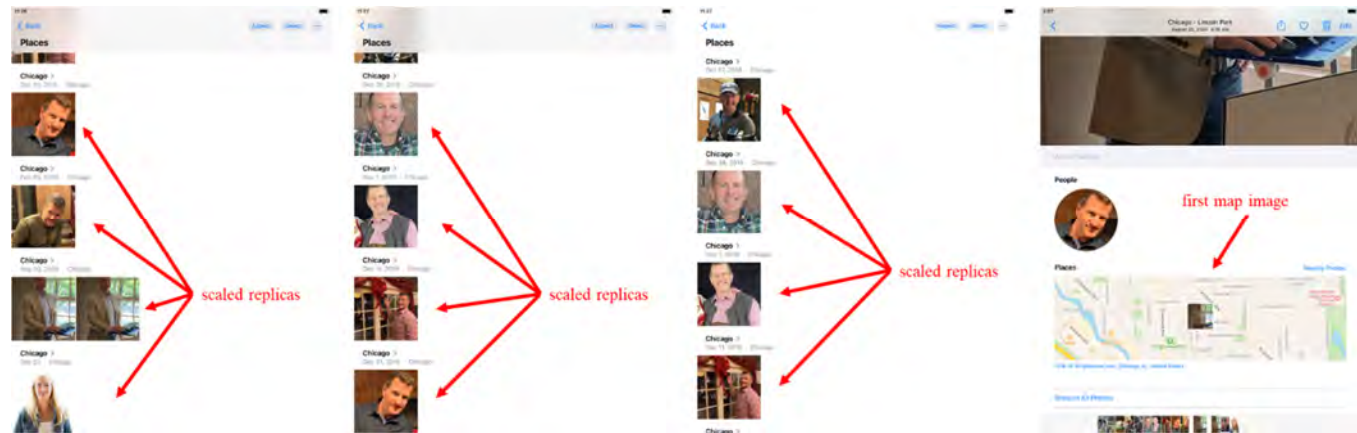


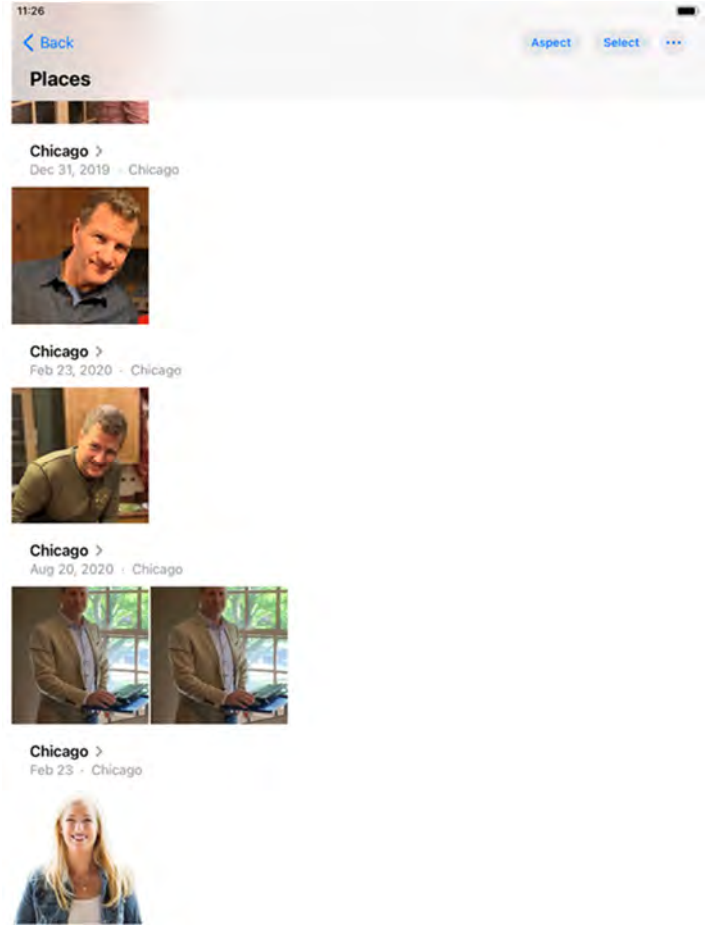
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS

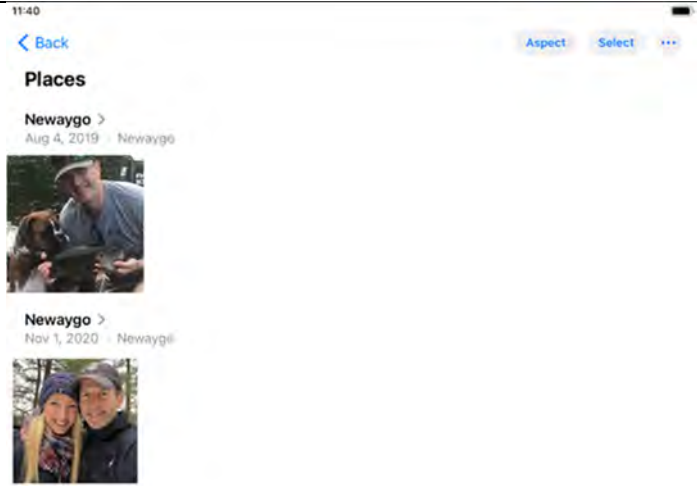



**1[c][iv]** the displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files are not overlaid on the first map image and

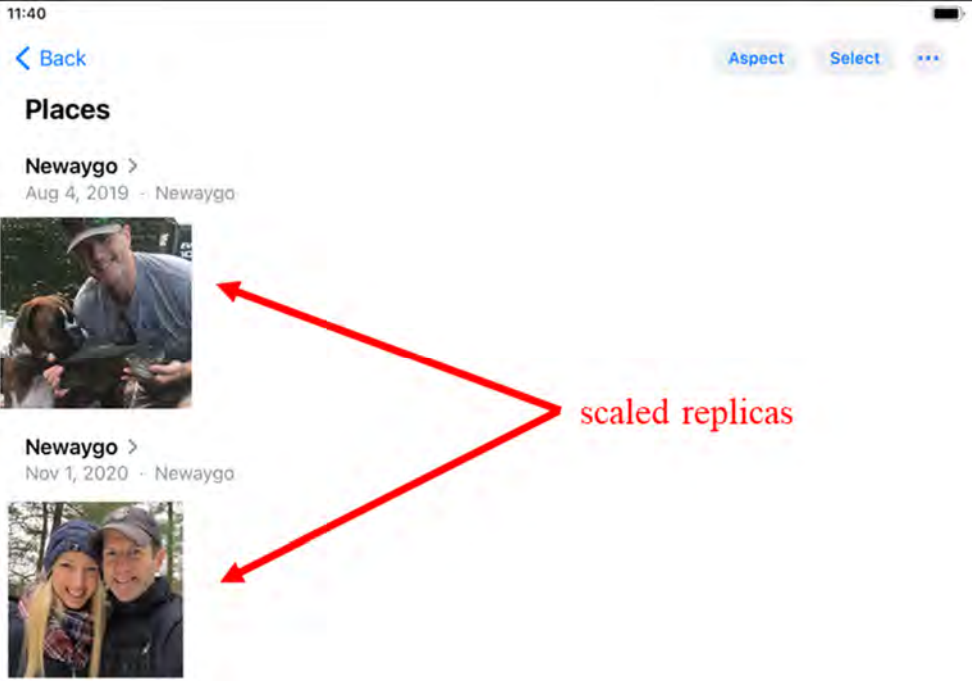


The displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files are not overlaid on the first map image.



<p><b>1[c][v]</b> the second screenshot of the video display device not including the interactive map; and</p>	<p>The second screenshot of the video display device does not include the interactive map.</p>  <p>The screenshot shows an iPadOS interface with a status bar at the top displaying the time 11:26 and battery level. Below the status bar is a navigation bar with a blue '&lt; Back' button on the left and 'Aspect', 'Select', and a three-dot menu icon on the right. The main content area is titled 'Places' and displays a list of location-based photos. Each item in the list includes a thumbnail image, the location name 'Chicago &gt;', and the date and location. The items are: 1) a photo of a man's face, dated 'Dec 31, 2019 · Chicago'; 2) another photo of a man's face, dated 'Feb 23, 2020 · Chicago'; 3) a photo of a man in a suit, dated 'Aug 20, 2020 · Chicago'; and 4) a photo of a woman's face, dated 'Feb 23 · Chicago'.</p>
<p><b>1[d]</b> responsive to a click or tap of the second user selectable thumbnail image,</p>	<p>Responsive to a click or tap of the second user selectable thumbnail image, iPadOS displays a second location view on the video display device. The second location view comprises a majority portion of a third screenshot of the video display device (e.g., Apple iPad).</p>

<p>displaying a second location view on the video display device, the second location view comprising a majority portion of a third screenshot of the video display device, the displaying the second location view including displaying</p>	 <p>The screenshot shows an iPadOS interface with a 'Places' section. At the top, there is a 'Back' button and 'Aspect', 'Select', and a three-dot menu. Below the title, there are two entries from 'Newaygo'. The first entry is dated 'Aug 4, 2019' and features a photo of a man with a dog. The second entry is dated 'Nov 1, 2020' and features a photo of a man and a woman.</p>
<p><b>1[d][i]</b> (i) a second location name corresponding to the second geotag,</p>	<p>iPadOS displays a second location name corresponding to the second geotag.</p>

	 <p>The screenshot shows an iPadOS interface with a 'Places' gallery. At the top, there is a 'Back' button and 'Aspect' and 'Select' options. Below the title 'Places', there are two photo thumbnails. The first thumbnail is dated 'Aug 4, 2019' and the second is dated 'Nov 1, 2020'. Both thumbnails have a red box around the word 'Newaygo'. A red arrow points to the 'Newaygo' label on the second thumbnail, with the text 'second location name' next to it.</p>
<p><b>1[d][ii]</b> (ii) a scaled replica of each of the digital photographs or images or videos in the second set of digital files, and</p>	<p>iPadOS displays a scaled replica of each of the digital photographs or images or videos in the second set of digital files.</p>

	 <p>11:40</p> <p>&lt; Back Aspect Select ...</p> <p><b>Places</b></p> <p><b>Newwaygo</b> &gt; Aug 4, 2019 - Newwaygo</p>  <p><b>Newwaygo</b> &gt; Nov 1, 2020 - Newwaygo</p>  <p>scaled replicas</p>
<p><b>1[d][iii]</b> (iii) a second map image indicating the geographic coordinates of the second geotag,</p>	<p>iPadOS displays a second map image indicating the geographic coordinates of the second geotag.</p>

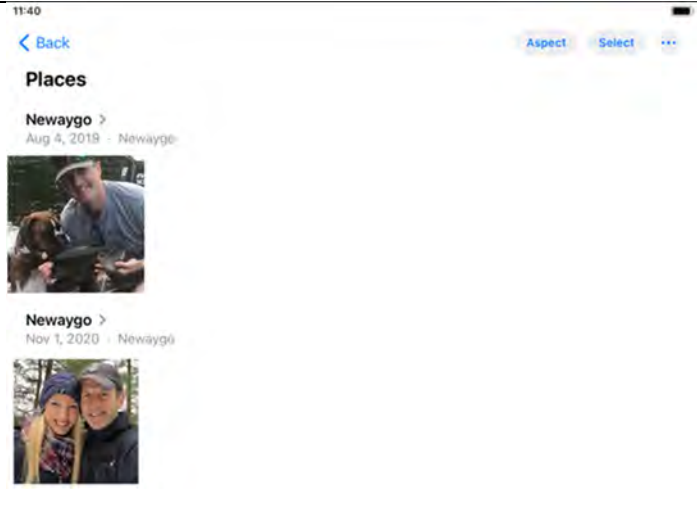
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS

<p><b>1[d][iv]</b> the displayed scaled replicas of each of the digital photographs or images or videos in the second set of digital files not being overlaid on the second map image and</p>	<p>The displayed scaled replicas of each of the digital photographs or images or videos in the second set of digital files are not overlaid on the second map image.</p>

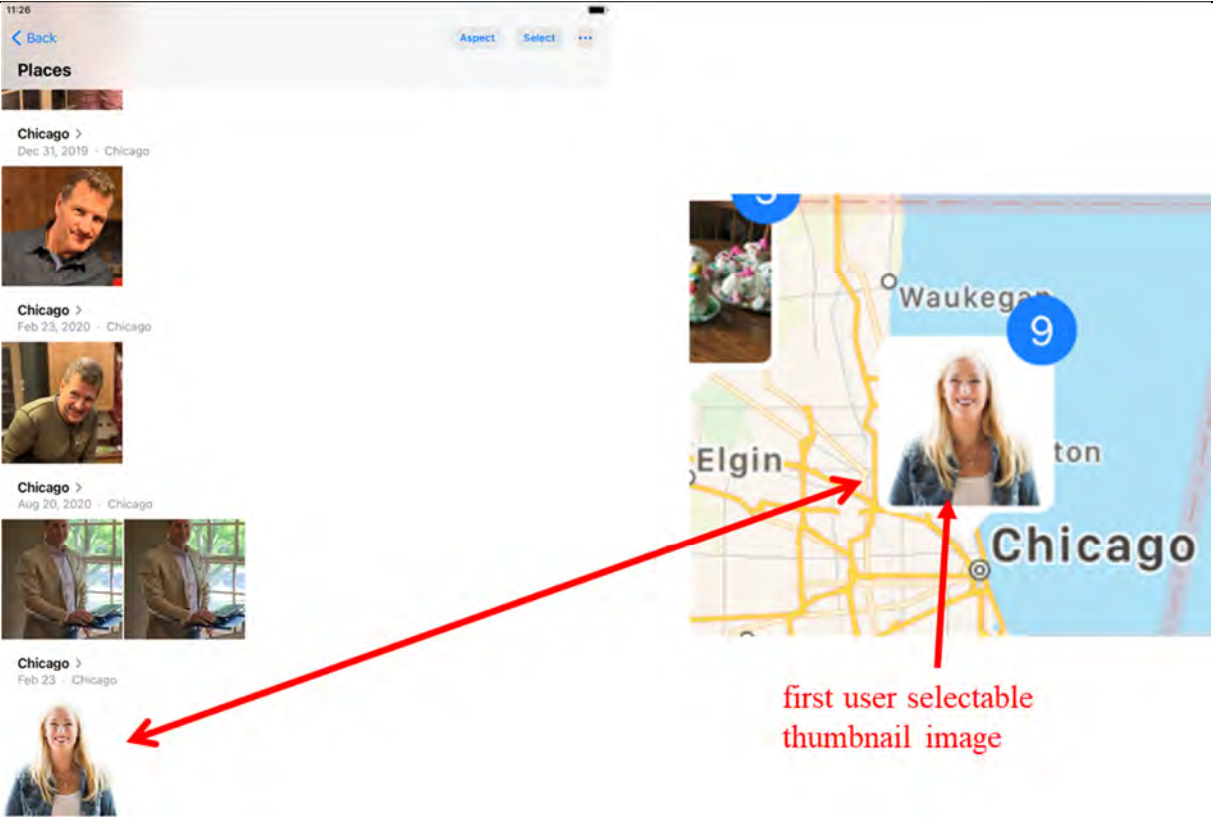
<p><b>1[d][v]</b> the third screenshot of the video display device not including the interactive map.</p>	<p>The third screenshot of the video display device does not include the interactive map.</p>



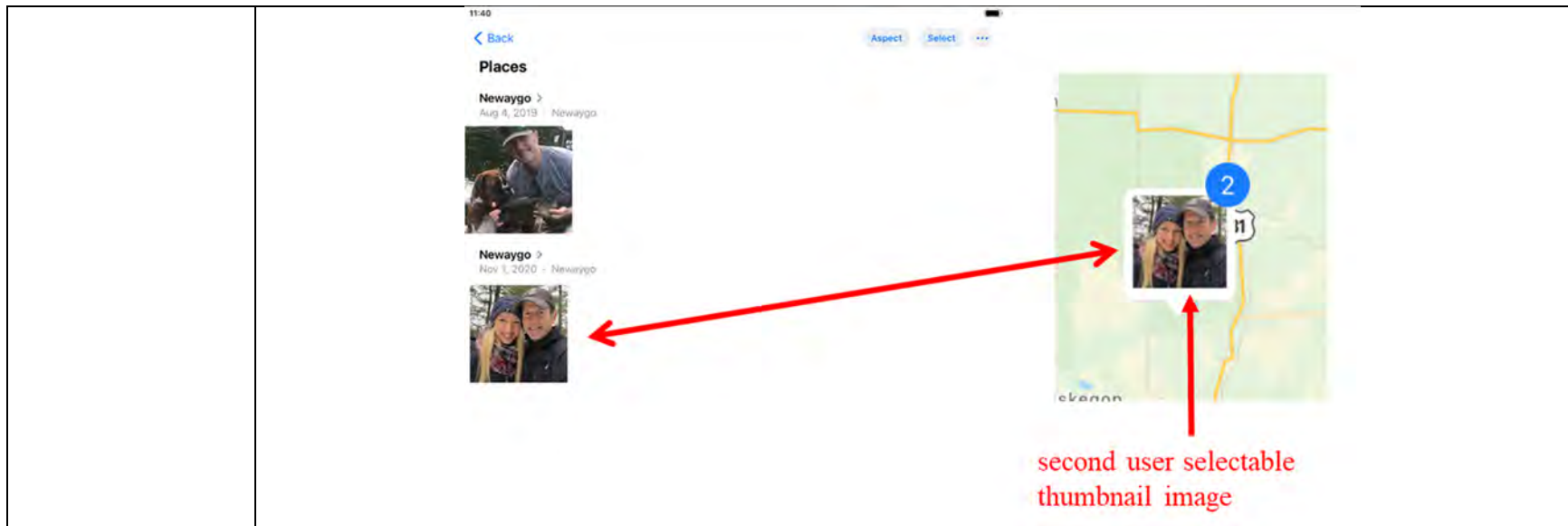
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS

	 <p>The screenshot shows an iPadOS gallery interface. At the top, there is a 'Back' button on the left and 'Aspect', 'Select', and a three-dot menu on the right. Below this is a section titled 'Places'. Under 'Places', there is a sub-section for 'Newaygo &gt;' with a date 'Aug 8, 2019 · Newaygo'. Below this is a photo of a man and a dog. Below that is another sub-section for 'Newaygo &gt;' with a date 'Nov 1, 2020 · Newaygo', followed by a photo of a man and a woman.</p>
<p><b>2[pre]</b> The computer-implemented method of claim 1, wherein</p>	<p><i>See</i> information for claim 1.</p>
<p><b>2[a]</b> the first user selectable thumbnail image includes a scaled representation of at least one of the digital images in the first set of digital files, and</p>	<p>The first user selectable thumbnail image includes a scaled representation of at least one of the digital images in the first set of digital files.</p>



	 <p>The image shows a screenshot of an iPadOS gallery application. On the left, a 'Places' album is visible with several photo thumbnails, each labeled 'Chicago' and with a date. A red arrow points from the bottom-most thumbnail (a woman's face) to a larger, detailed view on the right. This larger view shows a map of Chicago with a red circle and the number '9' overlaid on a photo of the same woman. Below this view, the text 'first user selectable thumbnail image' is written in red.</p>
<p><b>2[b]</b> wherein the second user selectable thumbnail image includes a scaled representation of at least one of the digital images in the second set of digital files.</p>	<p>The second user selectable thumbnail image includes a scaled representation of at least one of the digital images in the second set of digital files.</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iPadOS



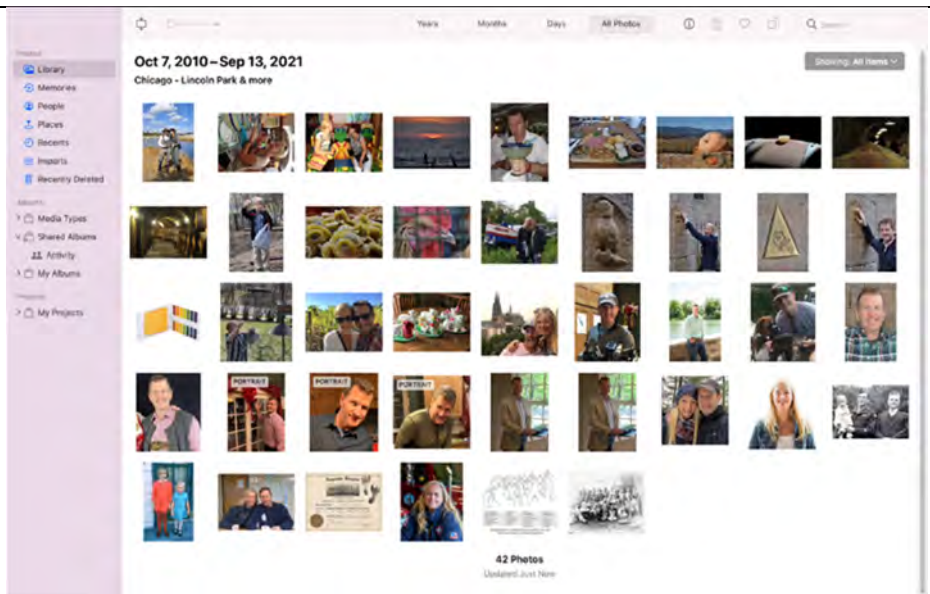
# **Exhibit A.3**

**U.S. Patent No. 9,552,376 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 9,552,376 (“the ‘376 patent”) in Apple macOS (including the Photos application). The exemplary screenshots below were taken using an Apple MacBook Pro running macOS 11.5.2 and Photos Version 6.0 (361.0.100). While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs, and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<b>1[pre]</b> A computer-implemented method of displaying digital files, comprising:	To the extent the preamble is limiting, macOS performs a computer-implemented method of displaying digital files, as set forth below.
<b>1[a]</b> storing, on one or more non-transitory computer-readable storage media, a plurality of digital files:	macOS stores, on one or more non-transitory computer-readable storage media, a plurality of digital files.

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

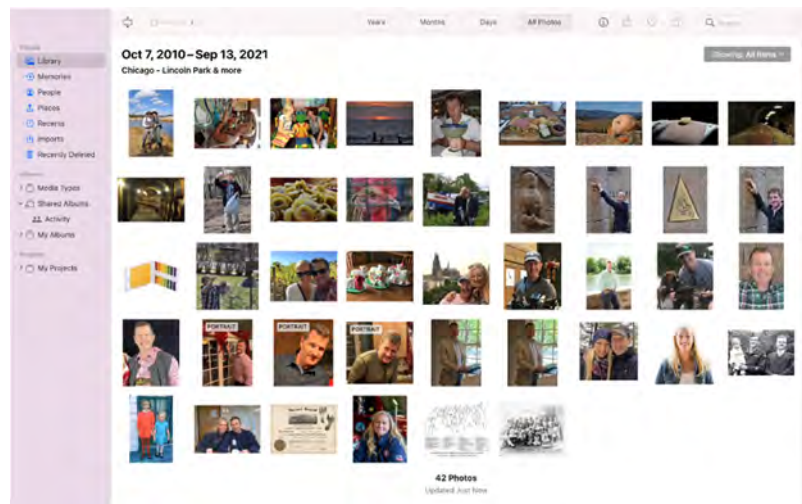


Macintosh HD - 57.23 GB available of 250.79 GB

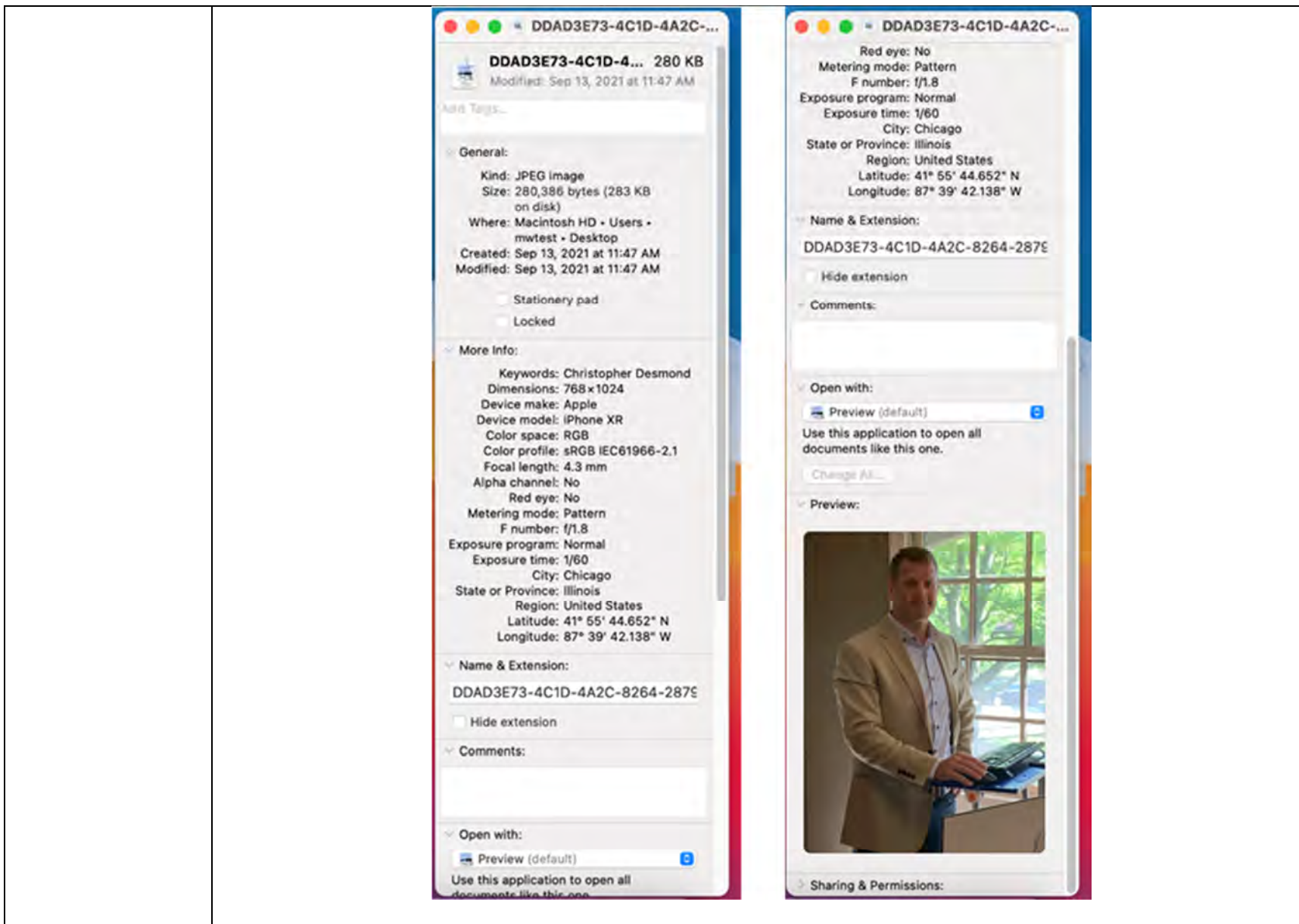


**1[a][i]** each of the digital files having embedded therein content data and metadata including tags, the content data including a digital photograph or image or video, the metadata including a geotag indicative of geographic coordinates where the digital photograph or image or video was taken;

Each of the digital files having embedded therein content data and metadata including tags. The content data includes a digital photograph or image or video. Exemplary content data (digital photograph, image, or video) is shown below.

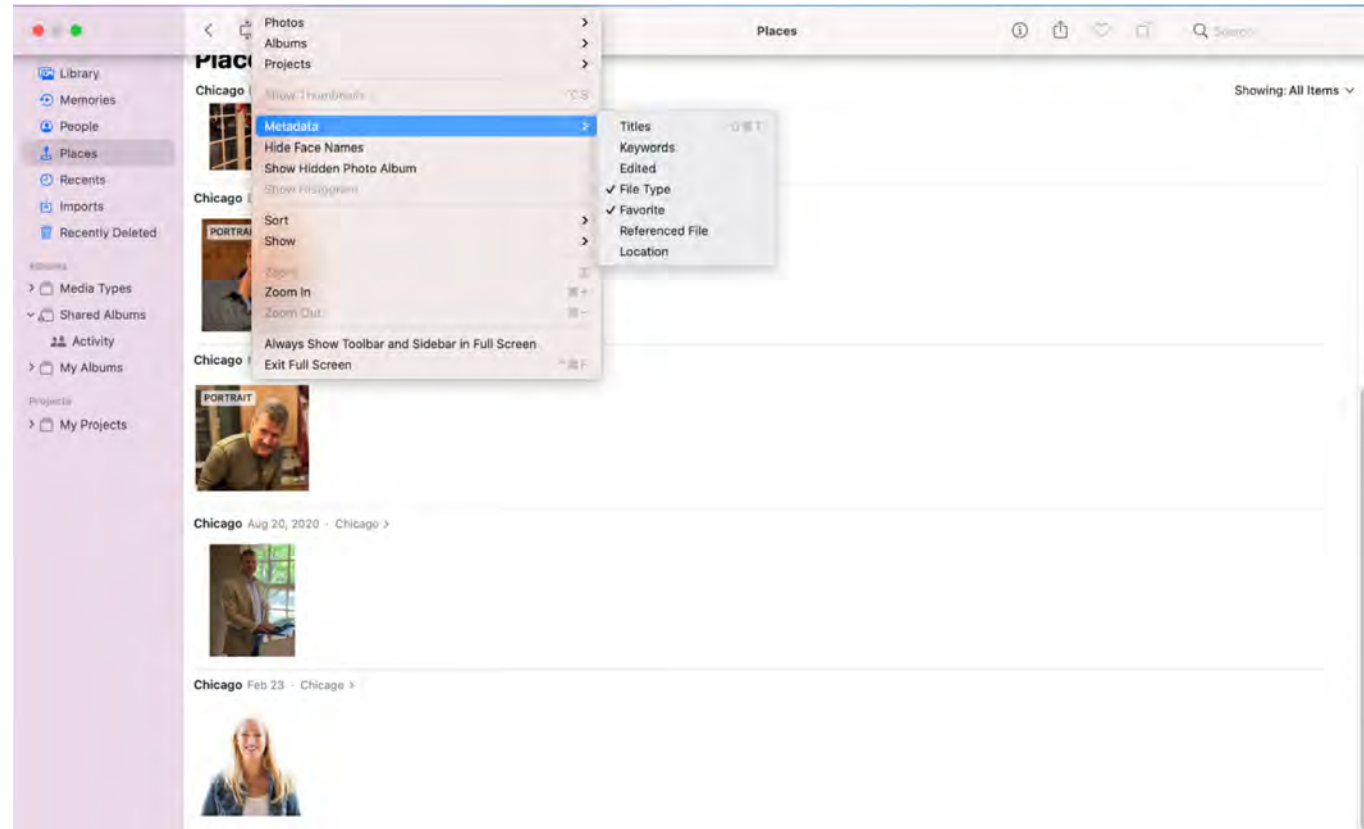


The metadata includes a geotag indicative of geographic coordinates where the digital photograph or image or video was taken. For example, as shown below, exemplary metadata for one of the digital files is visible in macOS via the Finder application. This metadata includes a geotag indicative of geographic coordinates where the digital photograph or image or video was taken.





Additionally, the macOS Photos application displays metadata (including location information) for a given digital file.

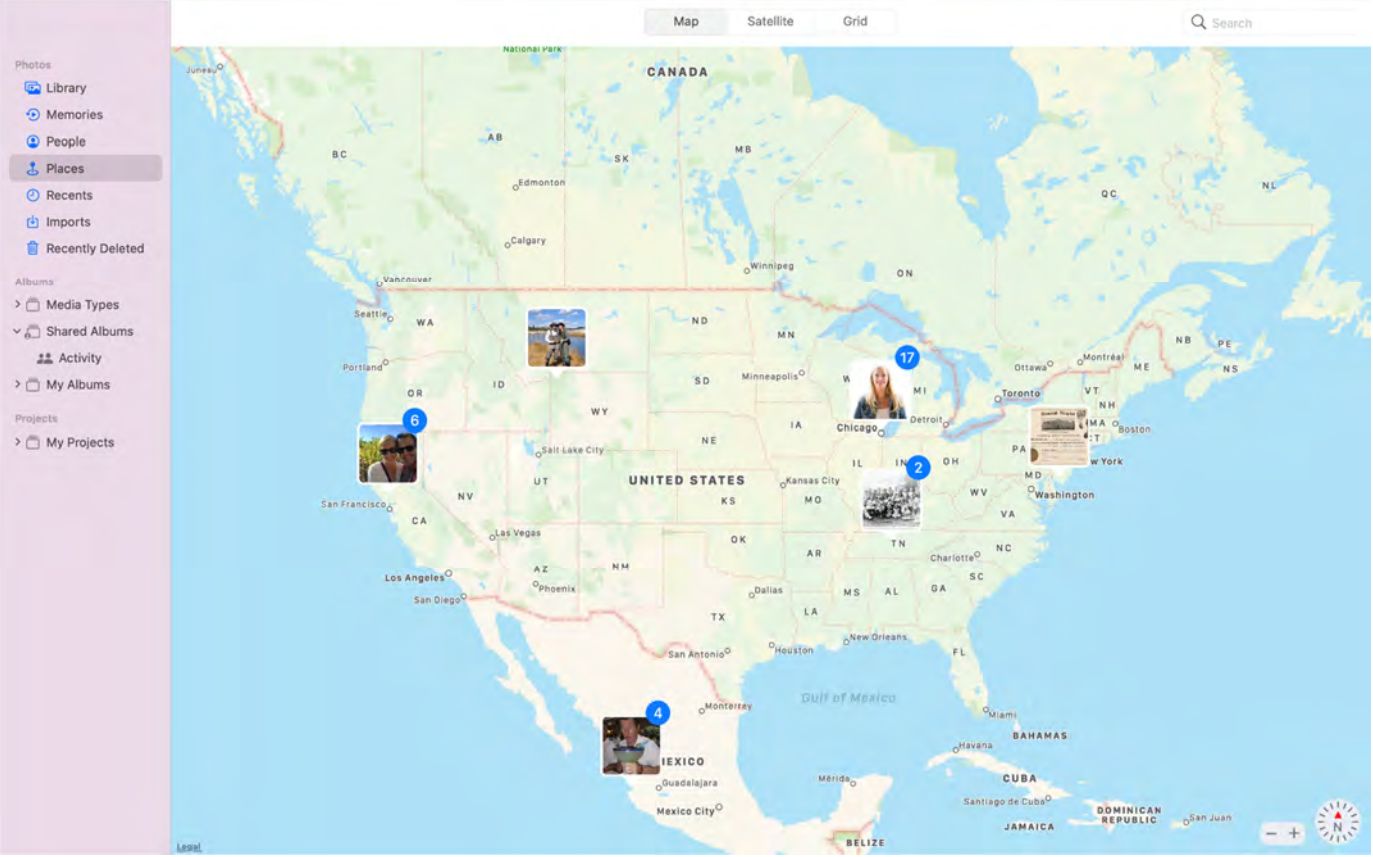


**1[b]** displaying a map view on a video display device, the displaying the map view including displaying:

macOS displays a map view on a video display device (e.g., an Apple MacBook).

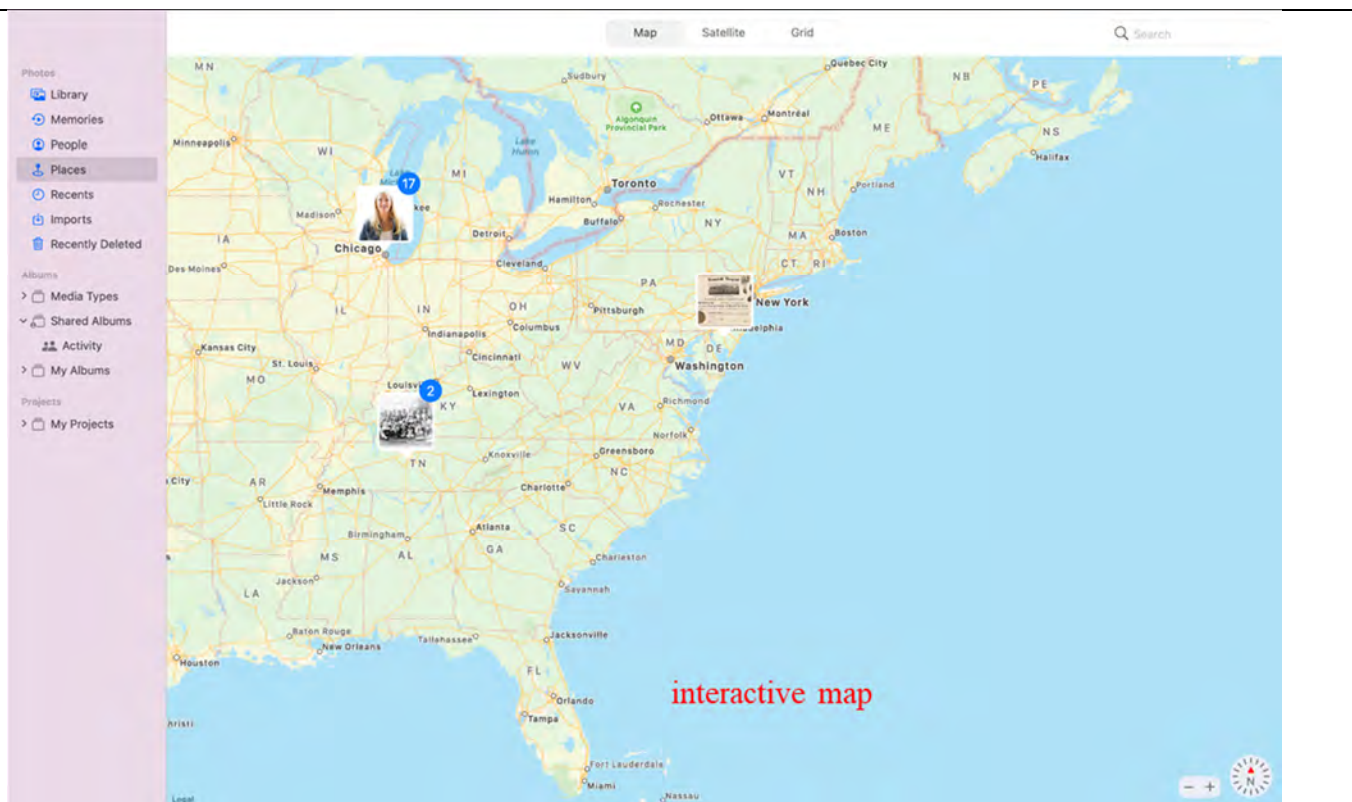


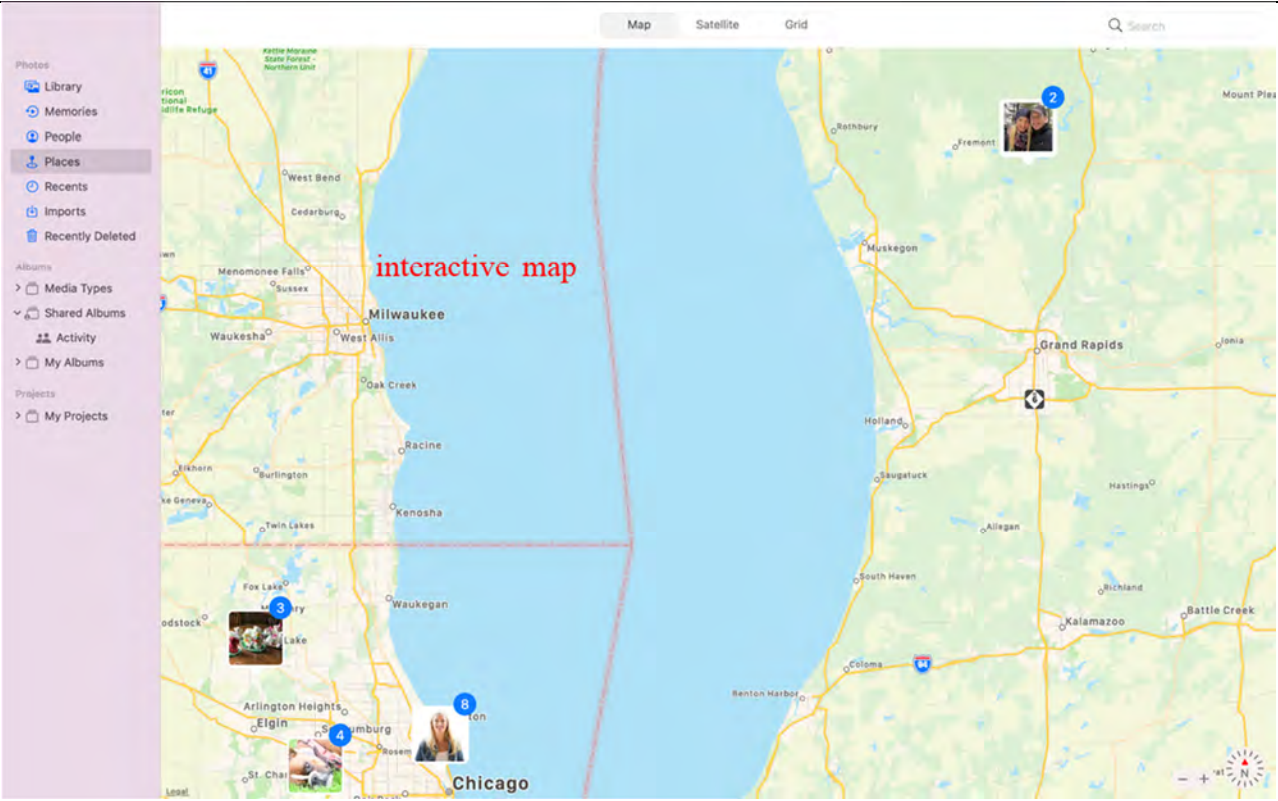
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

	
<p><b>1[b]i</b> (i) a representation of an interactive map, the representation of the interactive map comprising a majority portion of a first screenshot</p>	<p>macOS displays a representation of an interactive map. The map is interactive in that macOS can zoom in/out and/or move up, down, left, or right. The representation of the interactive map comprises a majority portion of a first screenshot of the video display device (e.g., Apple MacBook).</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

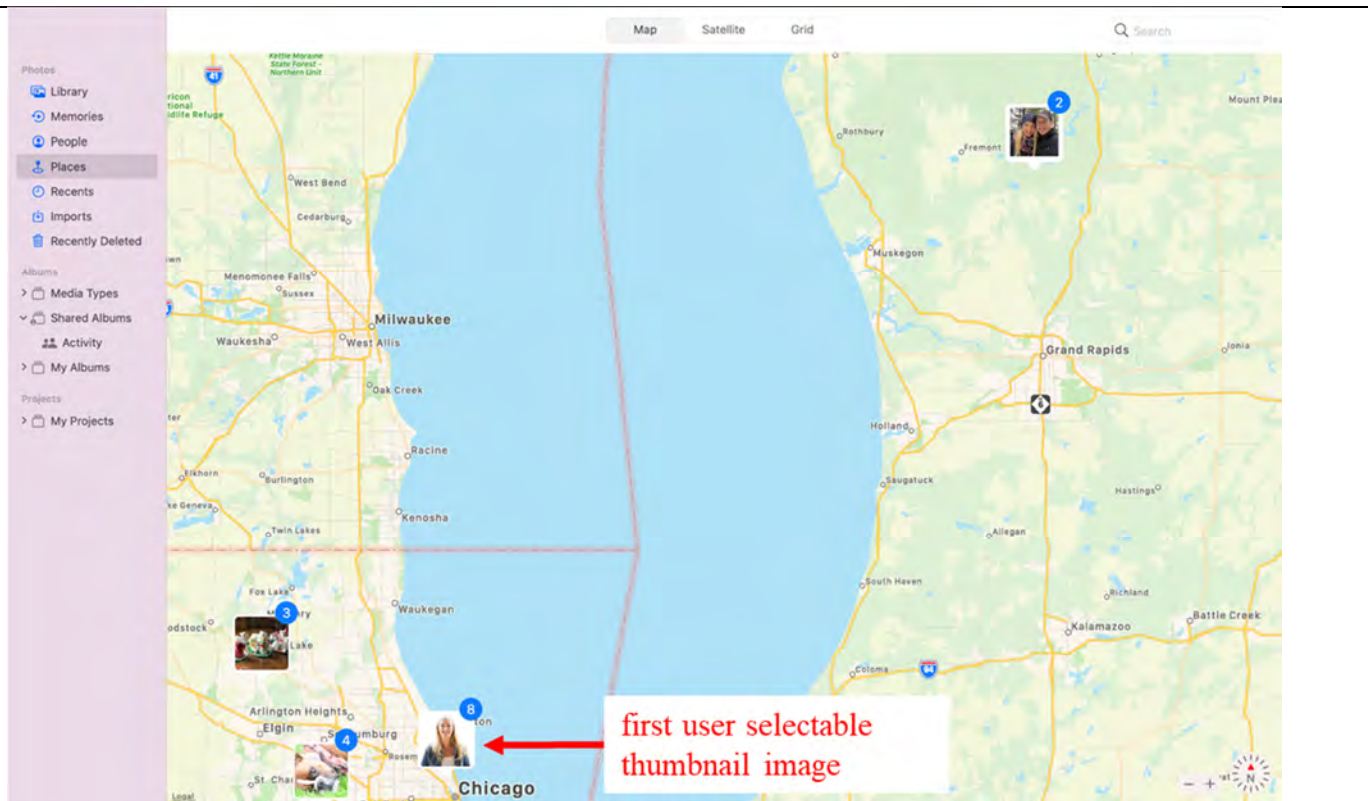
of the video display device;



	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places, Recents, Imports, and Recently Deleted. Below these are sections for Albums (Media Types, Shared Albums, Activity, My Albums) and Projects (My Projects). The main area displays a map of the Great Lakes region, including Milwaukee and Chicago. A red rectangular box highlights a portion of the map, with the text "interactive map" written in red inside it. Several geotags are visible on the map, each consisting of a small thumbnail image and a blue circular number. Geotag 2 is located near Fremont, WI. Geotag 3 is near Fox Lake, IL. Geotag 4 is near Elgin, IL. Geotag 5 is near Waukegan, IL. Geotag 6 is near Chicago, IL. The map includes standard navigation controls like zoom in/out and a compass.</p>
<p><b>1[b][ii]</b> (ii) a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic coordinates of a first geotag,</p>	<p>macOS displays a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic coordinates of a first geotag.</p>

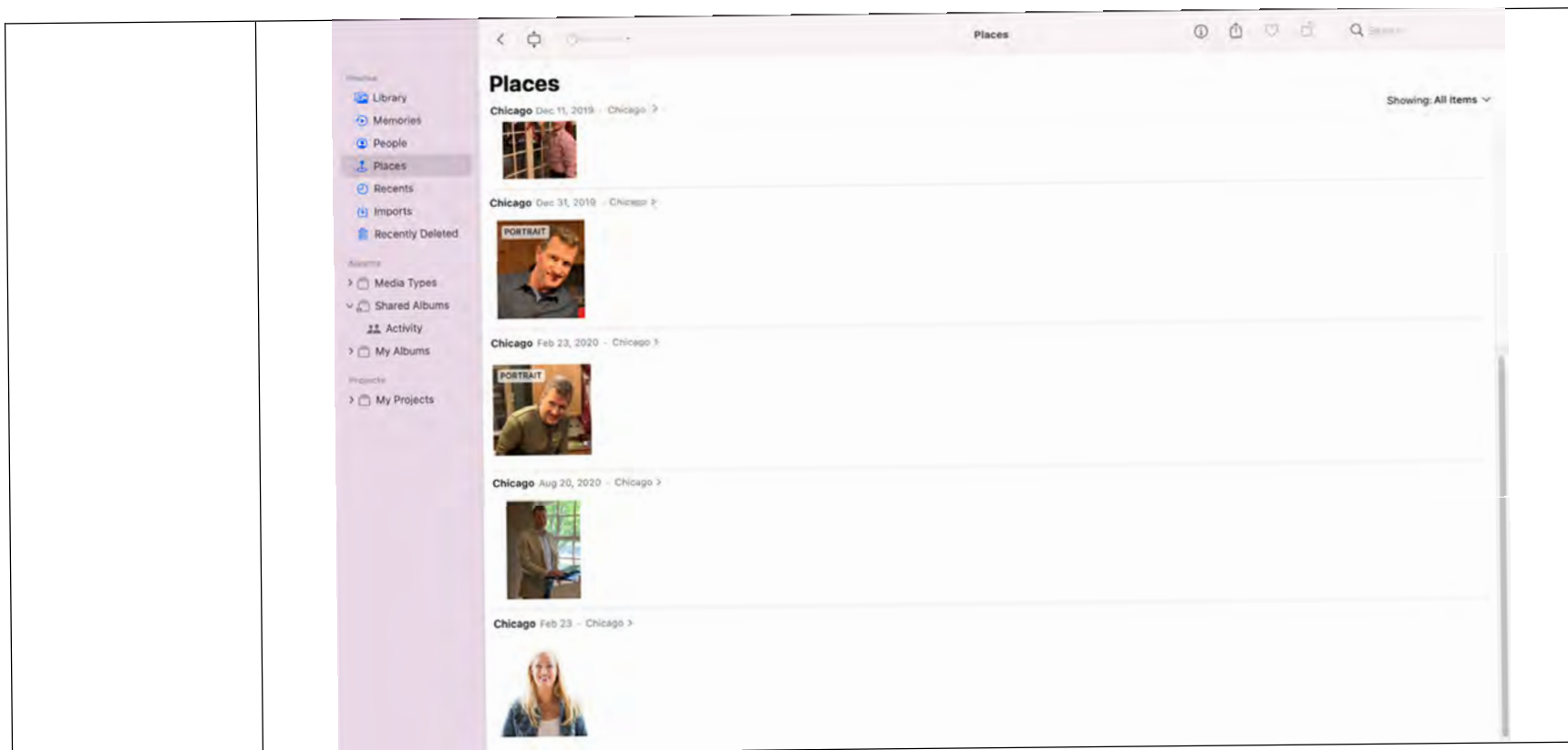
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

including all of the digital files having the first geotag;

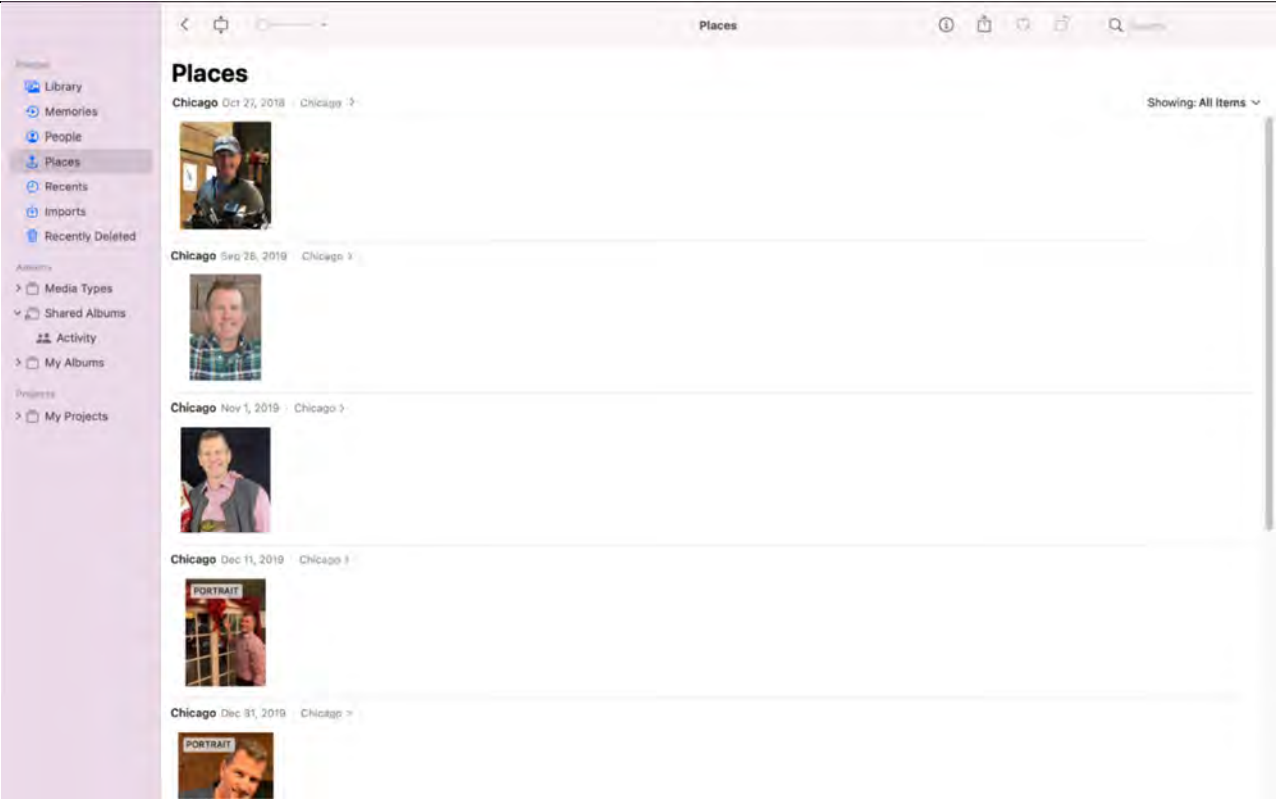


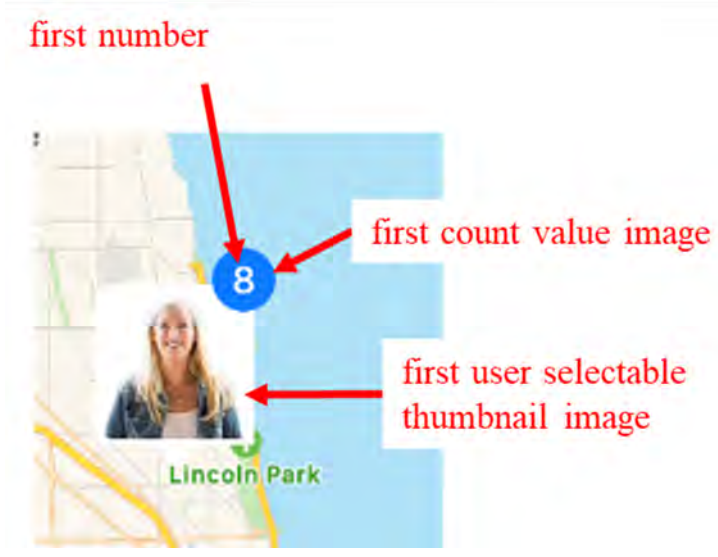
macOS stores a first set of digital files includes all of the digital files having the first geotag. *See also* information for limitation 1[a].

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS



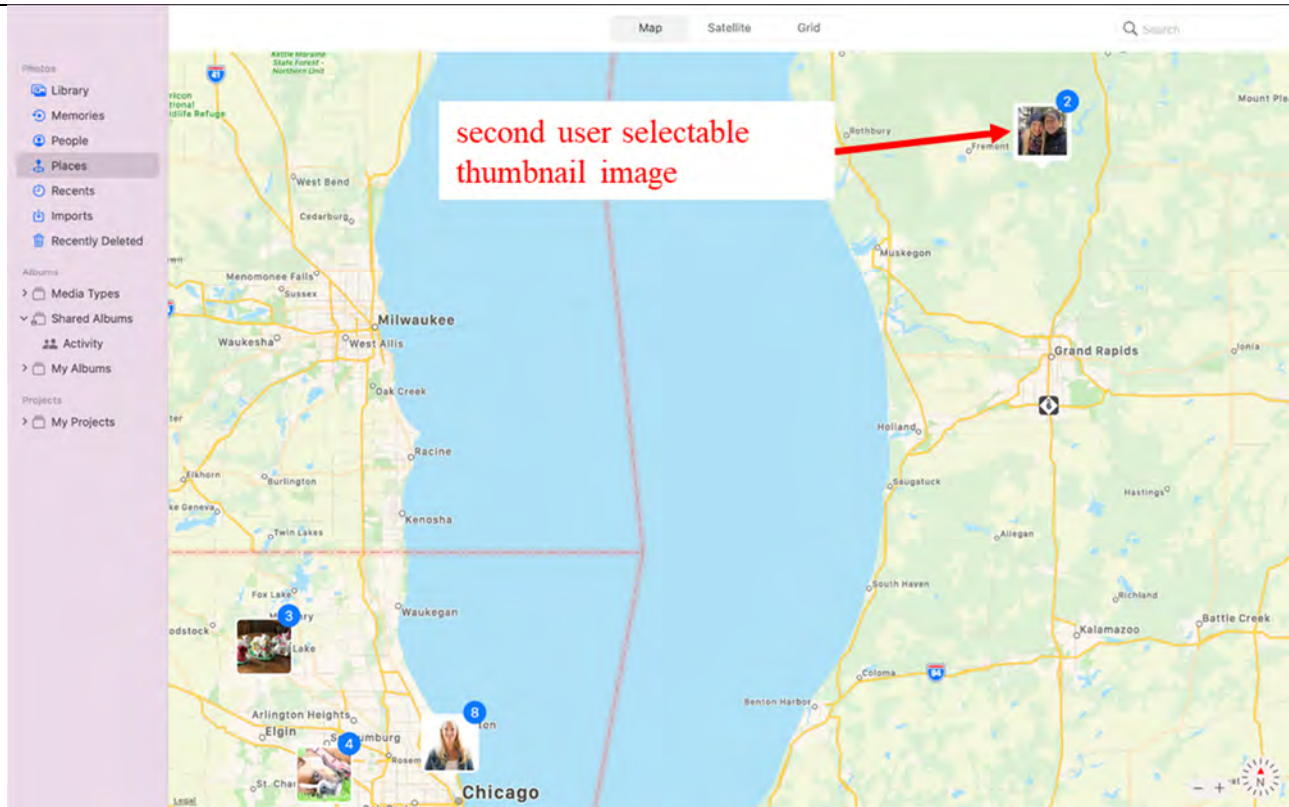


	
<p><b>1[b][iii]</b> (iii) a first count value image partially overlapping or directly connected to the first user selectable thumbnail image, the first count value image including a first</p>	<p>macOS displays a first count value image partially overlapping or directly connected to the first user selectable thumbnail image. The first count value image includes a first number that corresponds to the number of digital photographs or images or videos in the first set of digital files.</p>

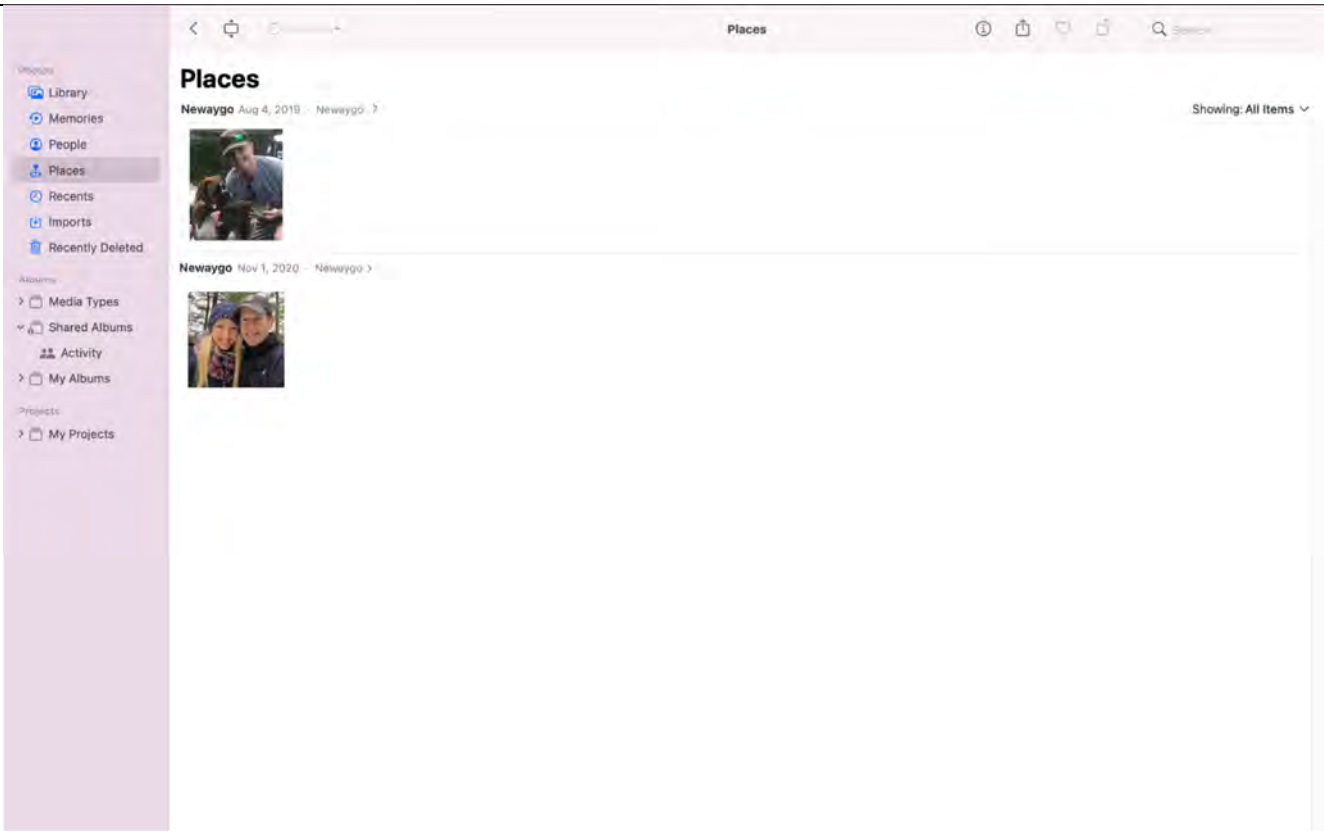
<p>number that corresponds to the number of digital photographs or images or videos in the first set of digital files;</p>	 <p>The image shows a map interface with a geotag. A red arrow labeled "first number" points to a blue circle containing the number "8". Another red arrow labeled "first count value image" points to the same blue circle. A third red arrow labeled "first user selectable thumbnail image" points to a small photo of a woman's face. Below the photo, the text "Lincoln Park" is visible on the map.</p>
<p><b>1[b][iv]</b> (iv) a second user selectable thumbnail image at a second location on the interactive map corresponding to the geographic coordinates of a second geotag, a second set of digital files including all of the digital files having the second geotag; and</p>	<p>macOS displays a second user selectable thumbnail image at a second location on the interactive map corresponding to the geographic coordinates of a second geotag.</p>

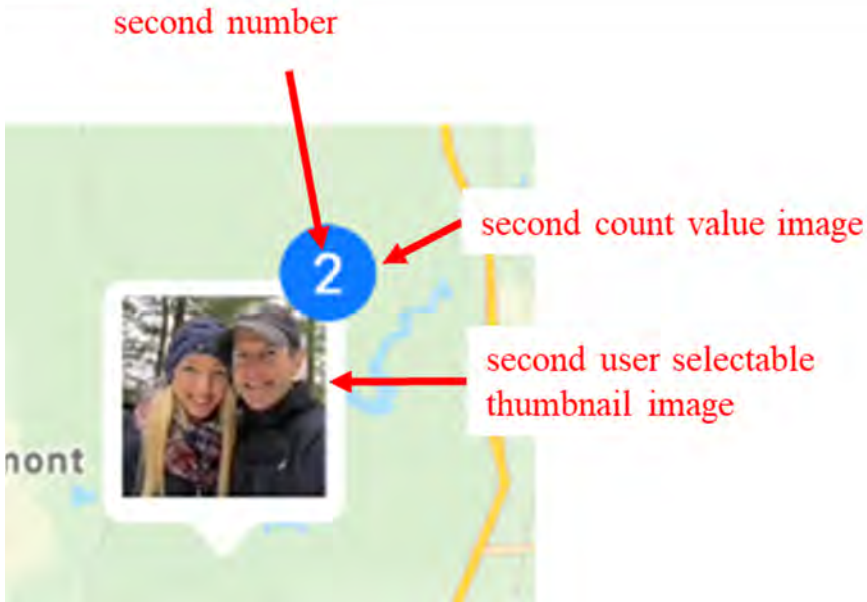


Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

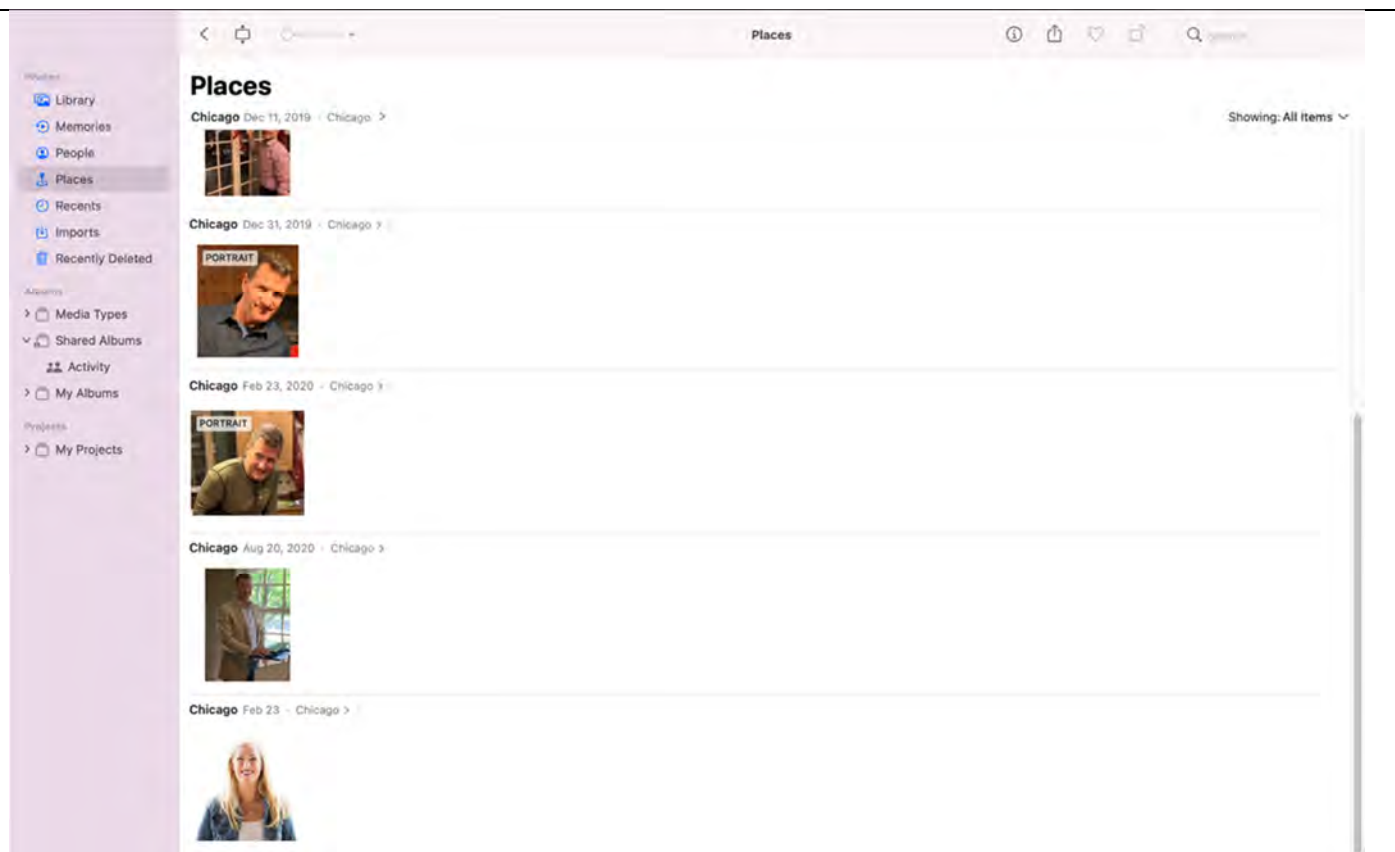


macOS stores a second set of digital files includes all of the digital files having the second geotag. *See also* information for limitation 1[a].

	
<p><b>1[b][v]</b> (v) a second count value image partially overlapping or directly connected to the second user selectable thumbnail image, the second count value image</p>	<p>macOS displays a second count value image partially overlapping or directly connected to the second user selectable thumbnail image. The second count value image includes a second number that corresponds to the number of digital photographs or images or videos in the second set of digital files.</p>

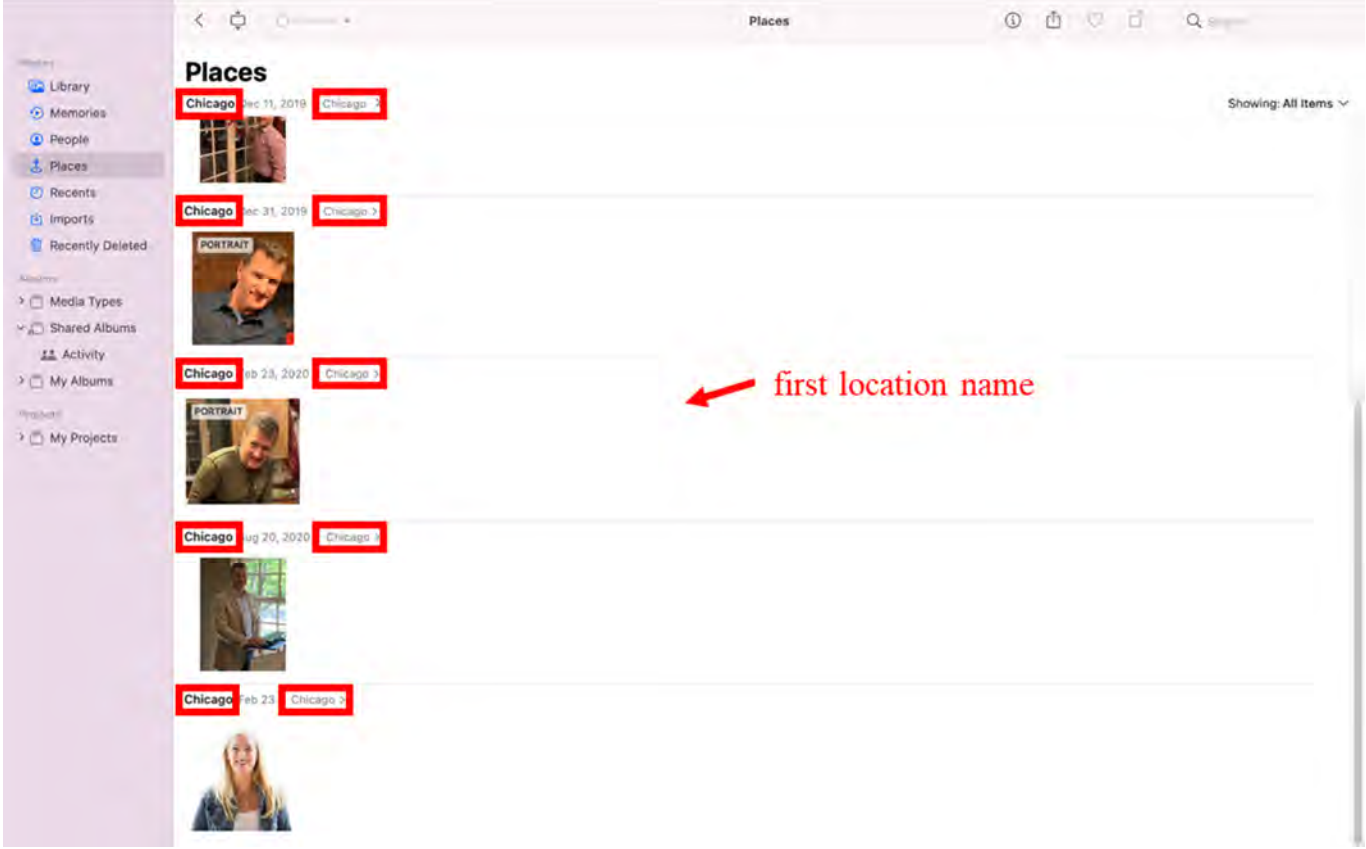
<p>including a second number that corresponds to the number of digital photographs or images or videos in the second set of digital files;</p>	 <p>The diagram illustrates a user interface element on a map. A red arrow labeled "second number" points to a blue circle containing the number "2". Another red arrow labeled "second count value image" points to the blue circle. A third red arrow labeled "second user selectable thumbnail image" points to a photo of a man and a woman. The photo is overlaid on a map background.</p>
<p><b>1[c]</b> responsive to a click or tap of the first user selectable thumbnail image, displaying a first location view on the video display device, the first location view comprising a majority portion of a second screenshot of the video display device, the</p>	<p>Responsive to a click or tap of the first user selectable thumbnail image, macOS displays a first location view on the video display device. The first location view comprises a majority portion of a second screenshot of the video display device (e.g., Apple MacBook Pro).</p>

displaying the first location view including displaying

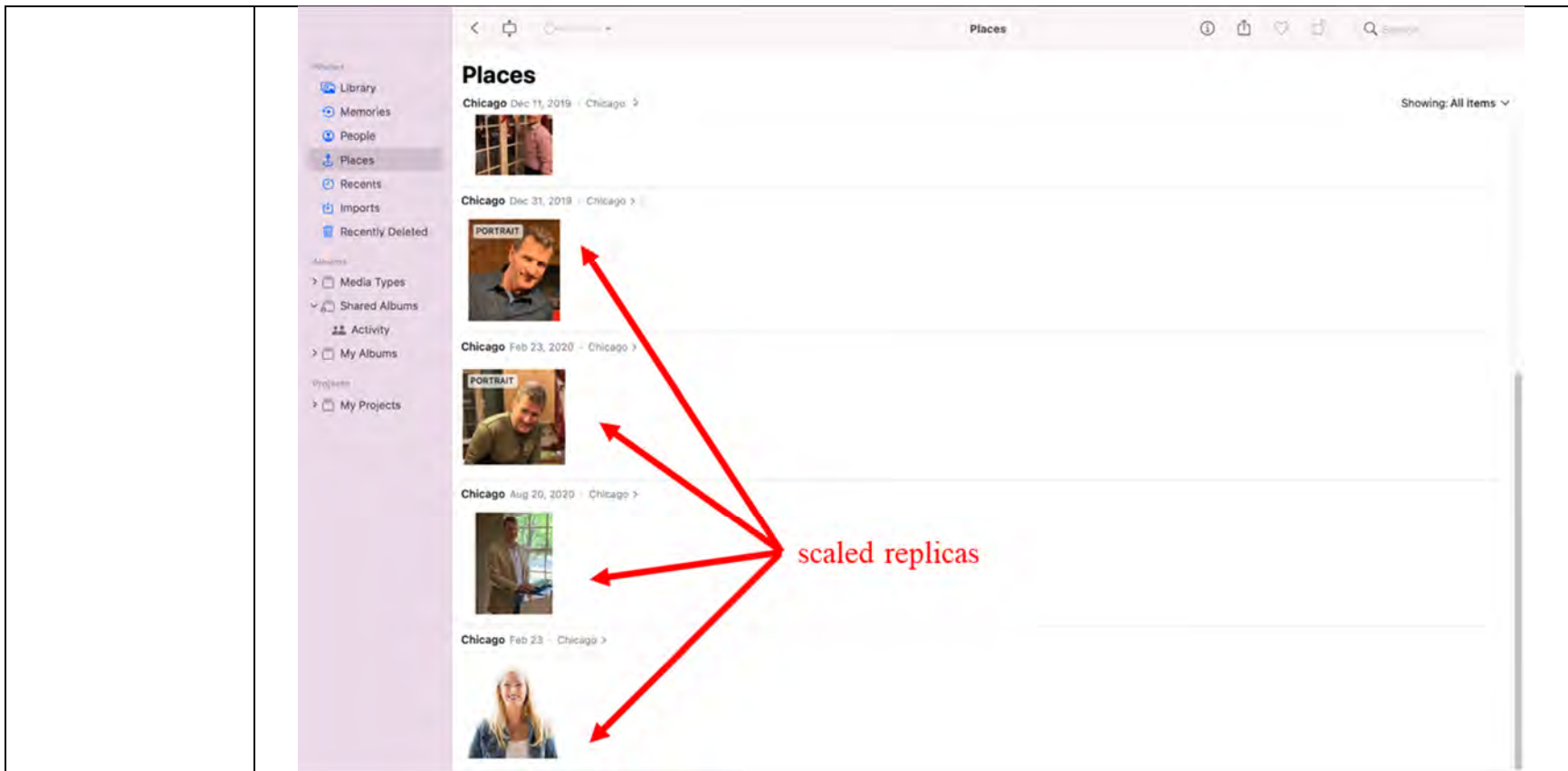


**1[c][i]** (i) a first location name corresponding to the first geotag,

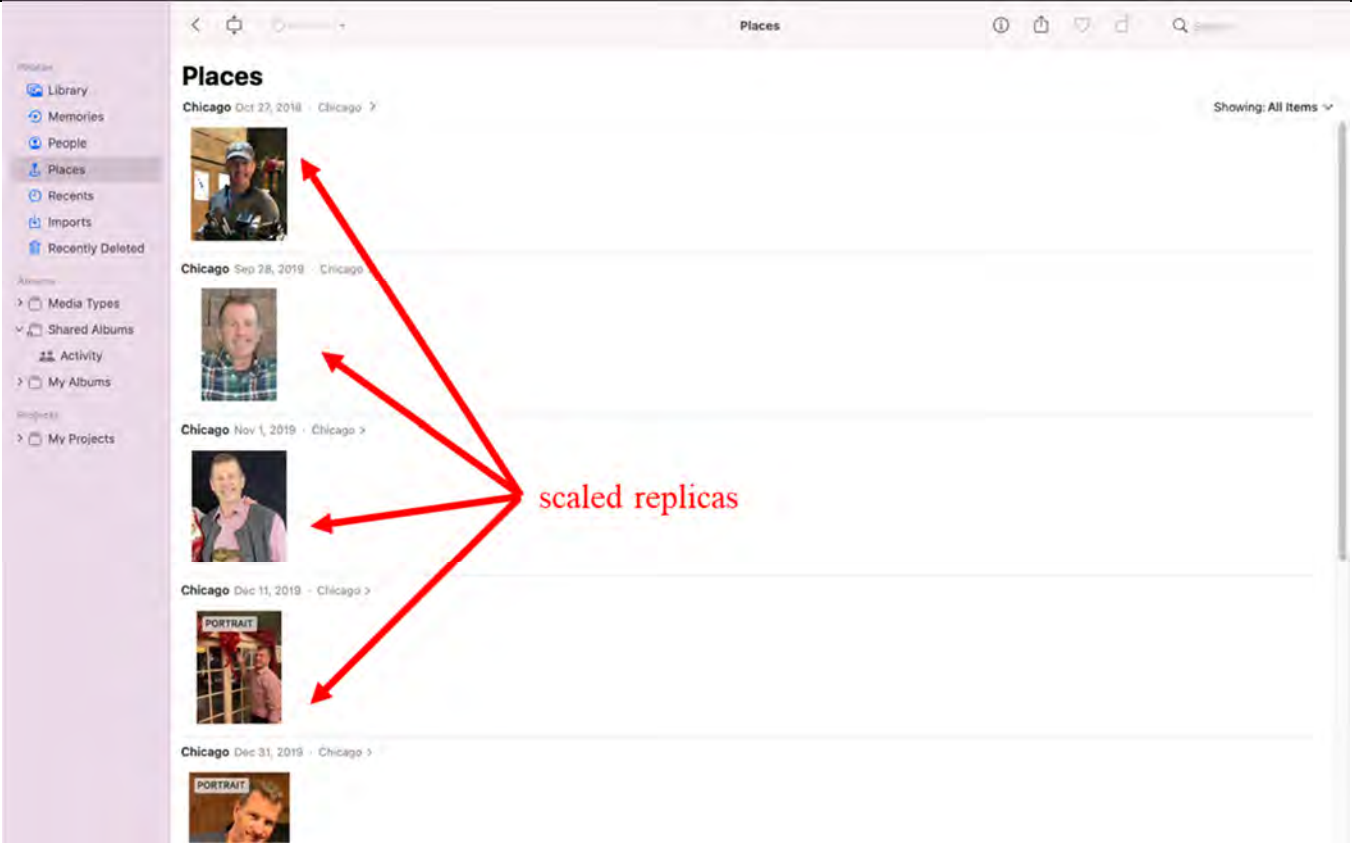
macOS displays a first location name corresponding to the first geotag.

	 <p>The screenshot shows the 'Places' view in the macOS Photos app. On the left is a sidebar with navigation options like Library, Memories, People, Places, Recents, Imports, Recently Deleted, Media Types, Shared Albums, Activity, My Albums, and My Projects. The main area displays a grid of photos. Each photo has a red box around the word 'Chicago' and a date. A red arrow points to the first 'Chicago' tag with the text 'first location name'.</p>
<p><b>1[c][ii]</b> (ii) a scaled replica of each of the digital photographs or images or videos in the first set of digital files, and</p>	<p>macOS displays a scaled replica of each of the digital photographs or images or videos in the first set of digital files.</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

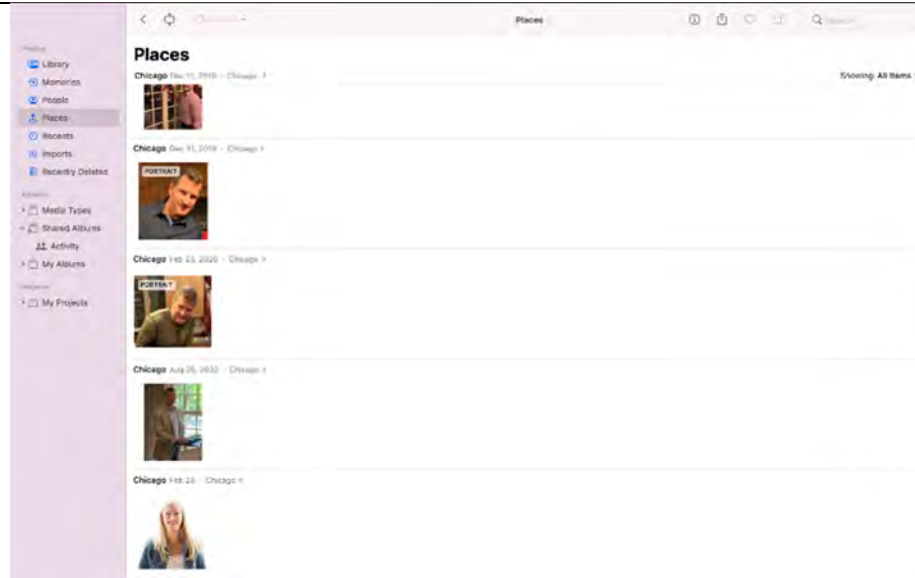


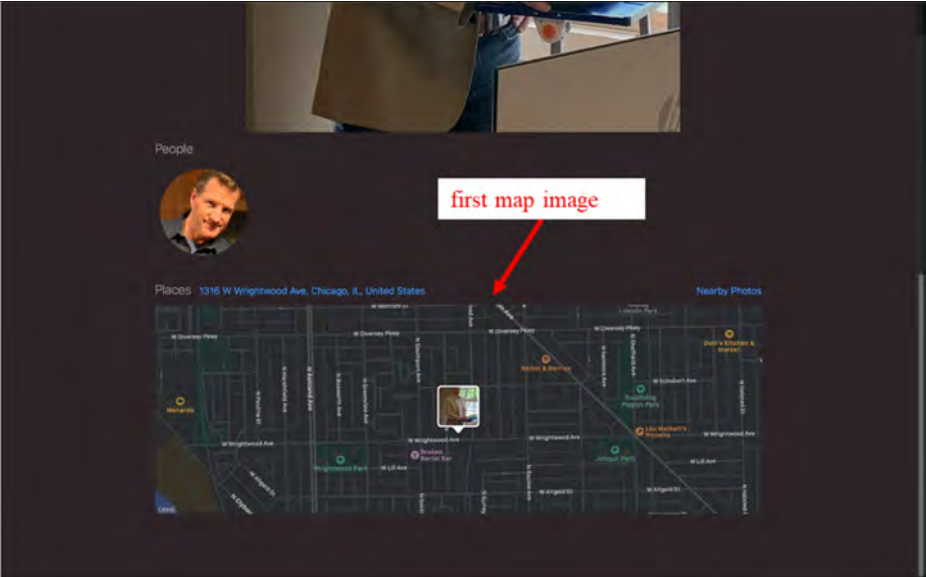
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

	 <p>The screenshot shows the 'Places' view in the macOS Photos app. The left sidebar contains navigation options: Library, Memories, People, Places (selected), Recents, Imports, and Recently Deleted. Below this are sections for Albums (Media Types, Shared Albums, Activity, My Albums) and Projects (My Projects). The main area displays a list of photos from Chicago, each with a date and a location tag. The photos are: 1. Chicago Oct 22, 2018 - Chicago (a man in a cap), 2. Chicago Sep 28, 2019 - Chicago (a man in a plaid shirt), 3. Chicago Nov 1, 2019 - Chicago (a woman in a vest), 4. Chicago Dec 11, 2019 - Chicago (a portrait of a woman), and 5. Chicago Dec 31, 2019 - Chicago (a portrait of a man). Four red arrows originate from the text 'scaled replicas' and point to the first four photos in the list.</p>
<p><b>1[c][iii]</b> (iii) a first map image indicating the geographic coordinates of the first geotag,</p>	<p>macOS displays a first map image indicating the geographic coordinates of the first geotag.</p>

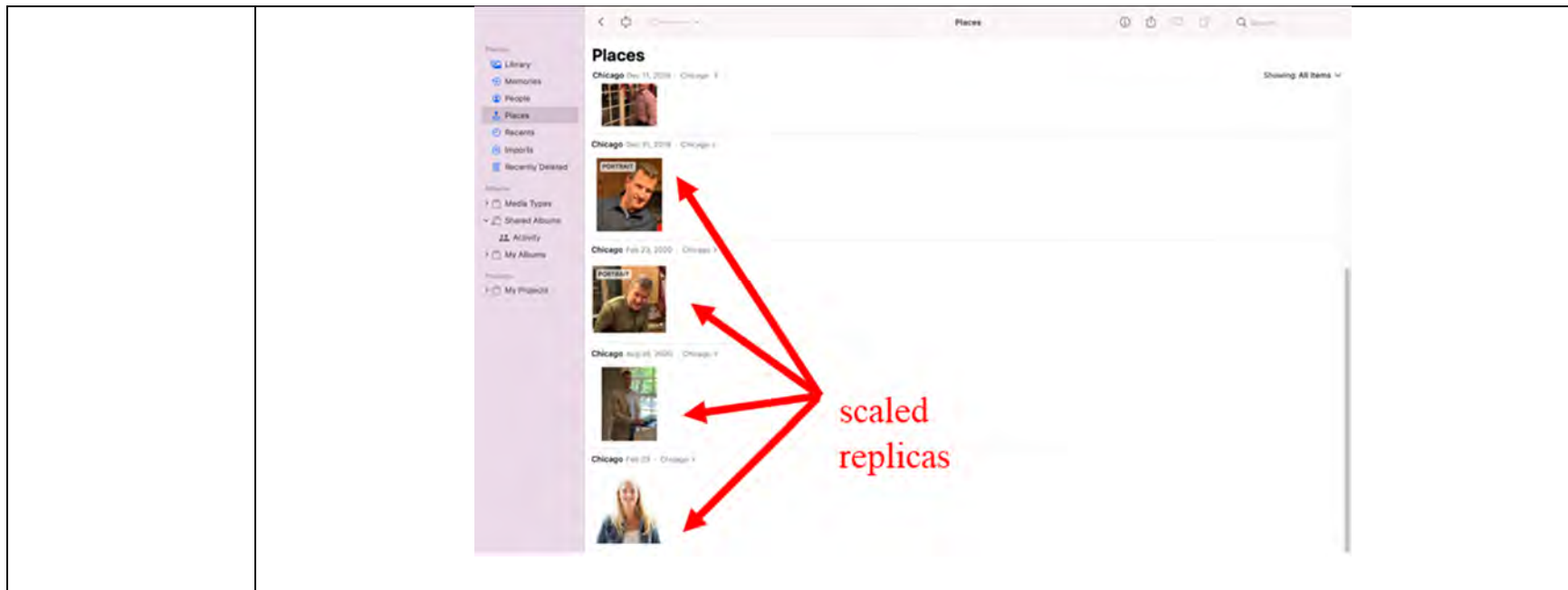


Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

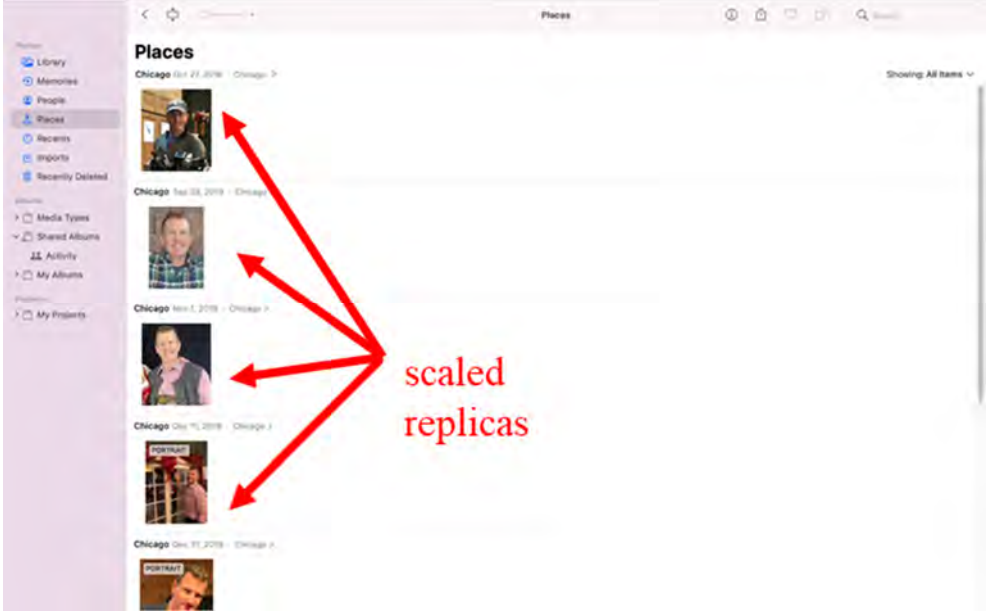


	
<p><b>1[c][iv]</b> the displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files not being overlaid on the first map image and</p>	<p>The displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files are not overlaid on the first map image.</p>

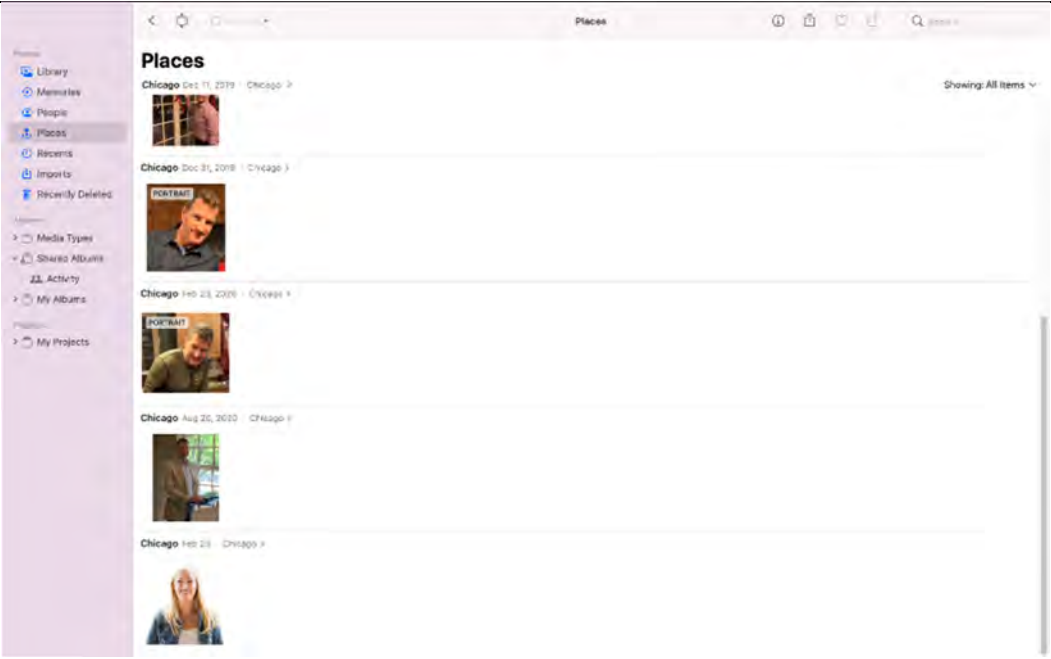
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

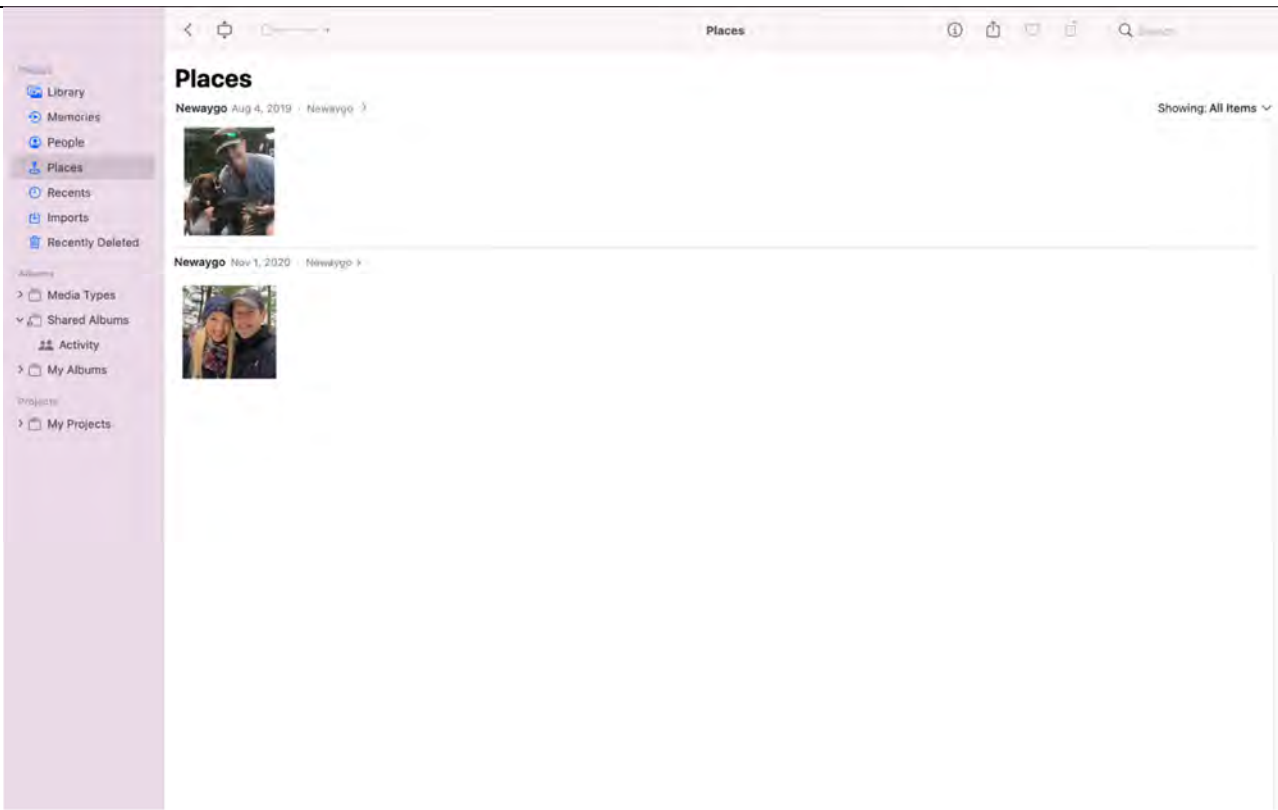


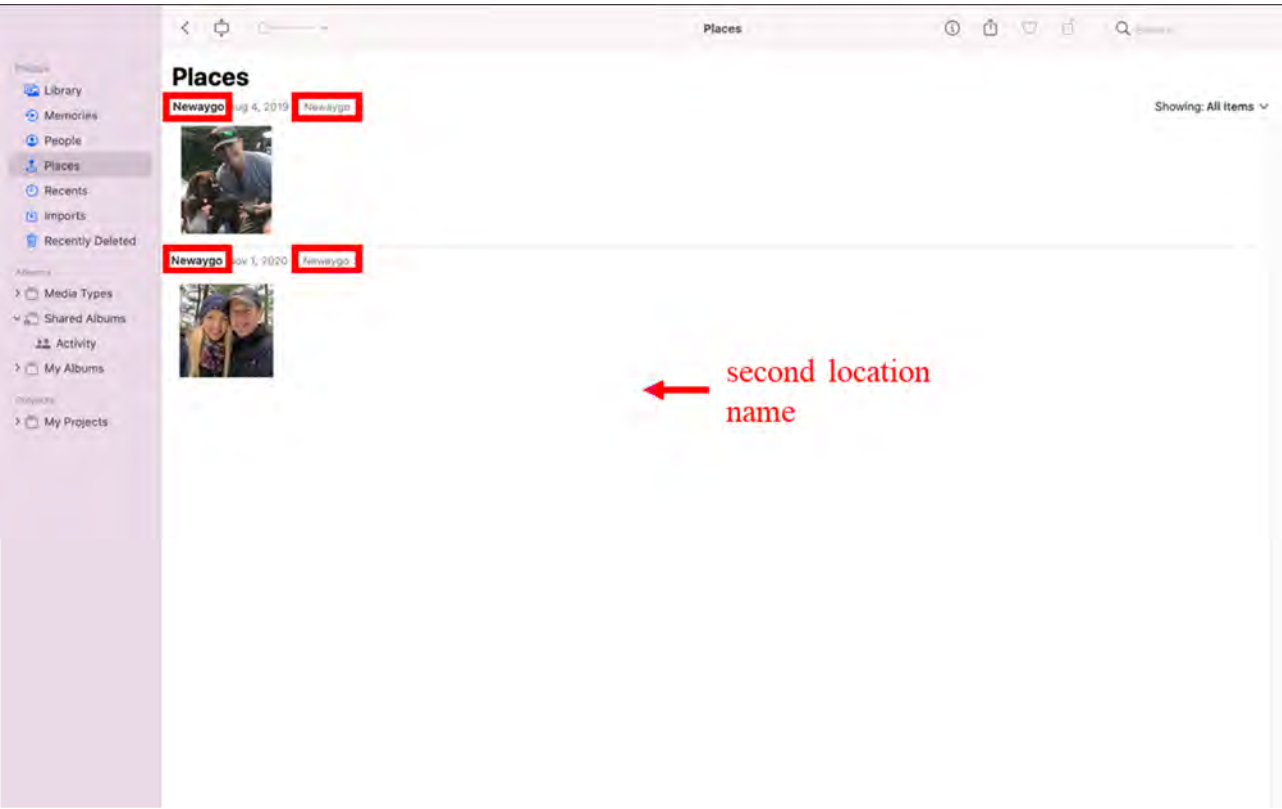
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

	 <p>The screenshot shows the 'Places' section of the Photos app. The left sidebar contains navigation options: Library, Memories, People, Places (selected), Recents, Imports, and Recently Deleted. Below these are sections for Media Types, Shared Albums, Activity, My Albums, and My Favorites. The main content area displays a list of photo thumbnails for the location 'Chicago'. Each thumbnail includes a date and a location tag. Red arrows point from the text 'scaled replicas' to several of these thumbnails, indicating that they are scaled versions of the original photos.</p>
<p><b>1[c][v]</b> the second screenshot of the video display device not including the interactive map; and</p>	<p>The second screenshot of the video display device does not include the interactive map.</p>

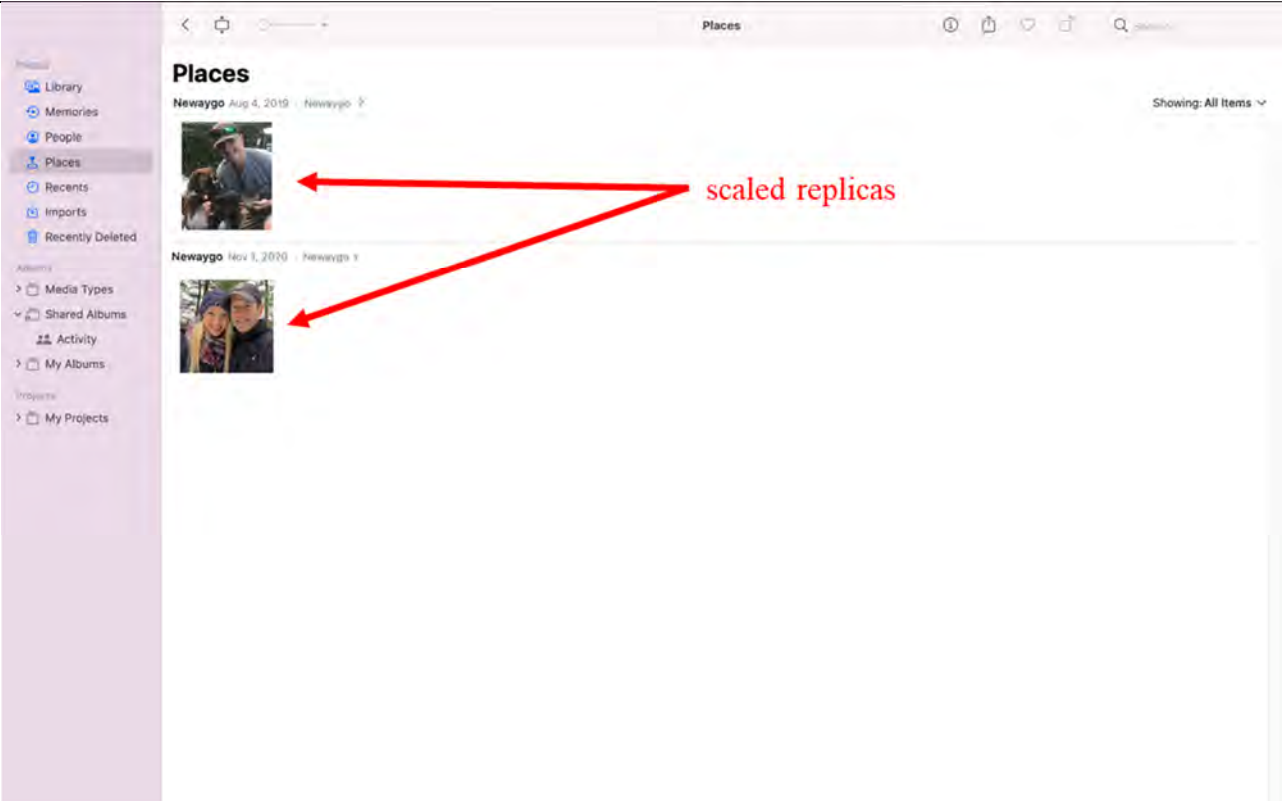
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

	
<p><b>1[d]</b> responsive to a click or tap of the second user selectable thumbnail image, displaying a second location view on the video display device, the second location view comprising a majority portion of a third screenshot of the video display device, the</p>	<p>Responsive to a click or tap of the second user selectable thumbnail image, macOS displays a second location view on the video display device. The second location view comprises a majority portion of a third screenshot of the video display device (e.g., Apple MacBook Pro).</p>

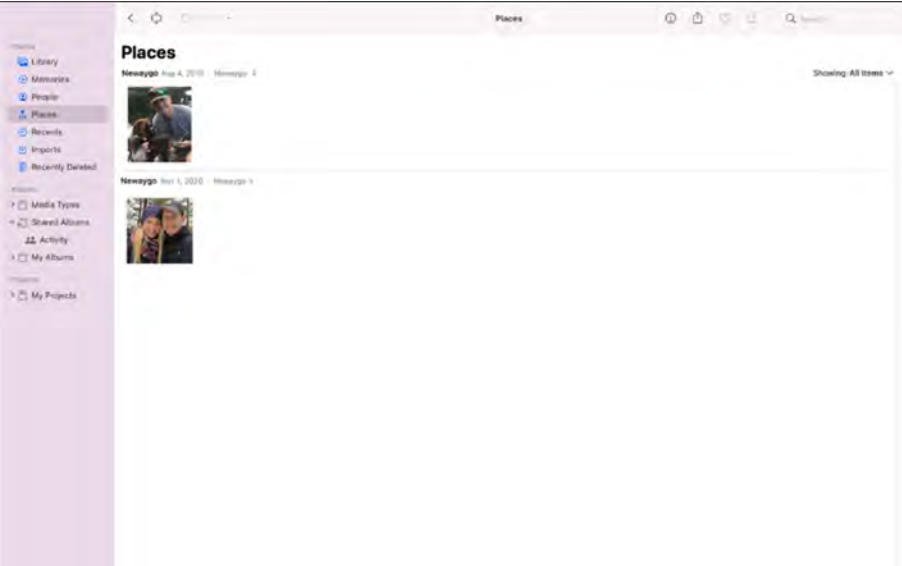
<p>displaying the second location view including displaying</p>	
<p><b>1[d][i]</b> (i) a second location name corresponding to the second geotag,</p>	<p>macOS displays a second location name corresponding to the second geotag.</p>

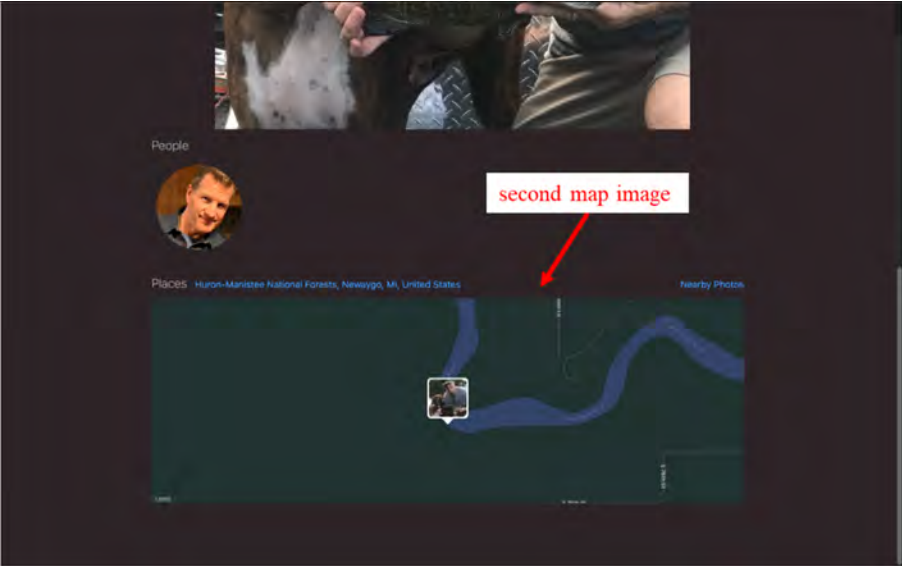
	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places (selected), Recents, Imports, and Recently Deleted. The main area is titled 'Places' and displays a grid of photos. Two photos are visible, each with a red-bordered tag that says 'Newaygo'. The first photo is dated 'Aug 4, 2019' and the second is dated 'Nov 1, 2020'. A red arrow points to the 'Newaygo' tag on the second photo, with the text 'second location name' next to it. The top of the window shows standard macOS window controls and a search bar.</p>
<p><b>1[d][ii]</b> (ii) a scaled replica of each of the digital photographs or images or videos in the second set of digital files, and</p>	<p>macOS displays a scaled replica of each of the digital photographs or images or videos in the second set of digital files.</p>

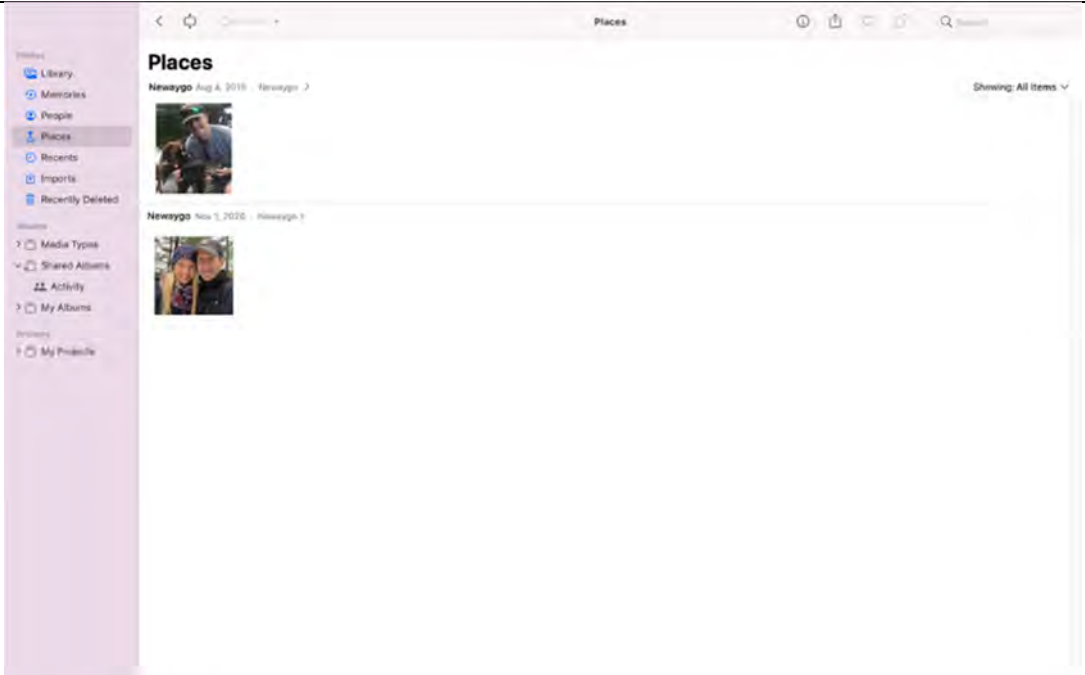


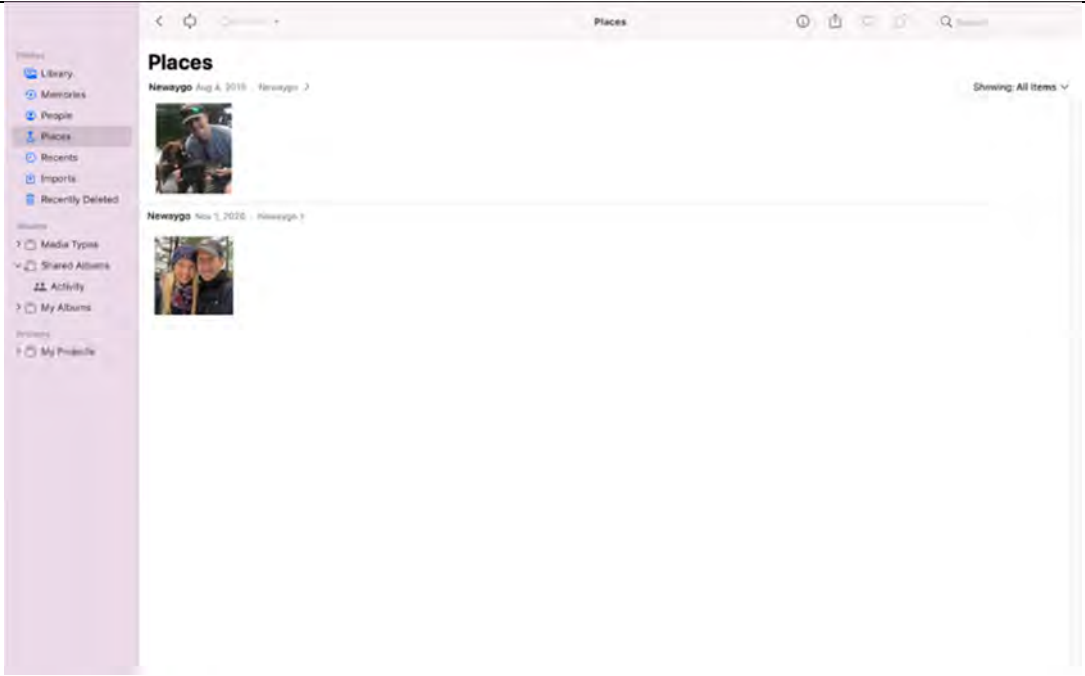
	 <p>The screenshot shows the 'Places' view in the macOS Photos app. On the left is a sidebar with navigation options: Library, Memories, People, Places (selected), Recents, Imports, and Recently Deleted. Below these are 'Albums' (Media Types, Shared Albums, Activity, My Albums) and 'Projects' (My Projects). The main area displays two geotagged photos from 'Newygo'. The first photo is dated 'Aug 4, 2019' and the second is dated 'Nov 1, 2019'. Two red arrows originate from the text 'scaled replicas' on the right and point to the two photos, indicating they are scaled versions of each other.</p>
<p><b>1[d][iii]</b> (iii) a second map image indicating the geographic coordinates of the second geotag,</p>	<p>macOS displays a second map image indicating the geographic coordinates of the second geotag.</p>

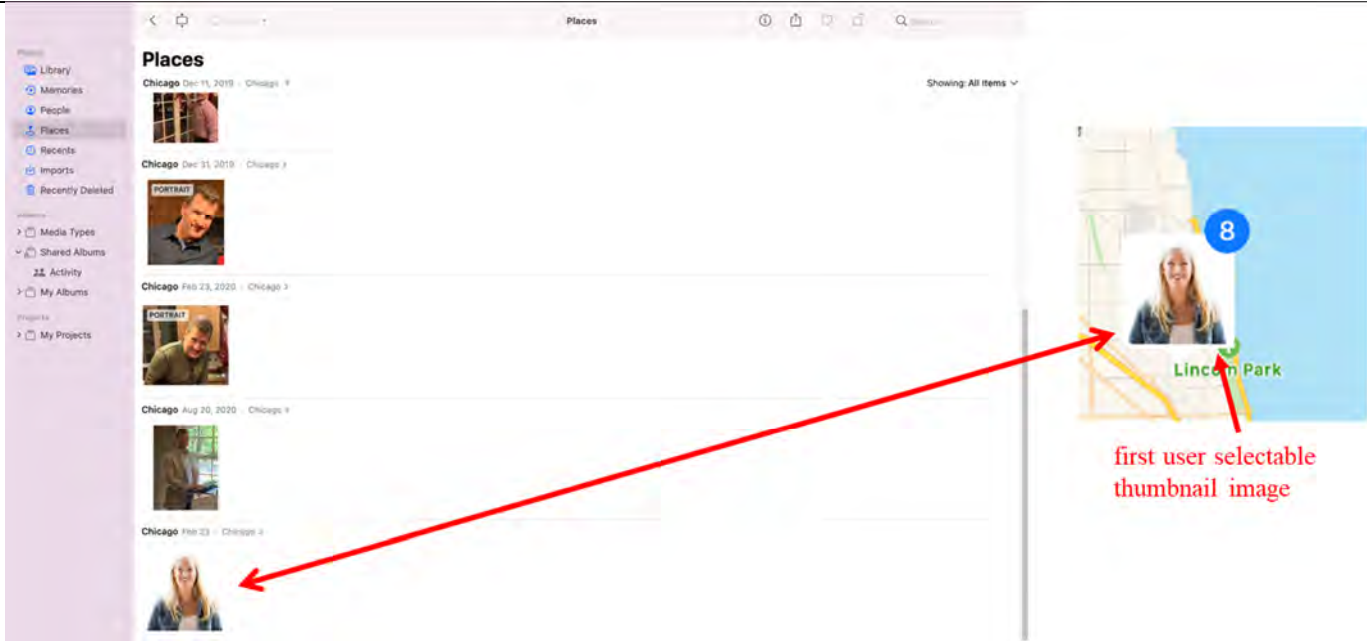
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS



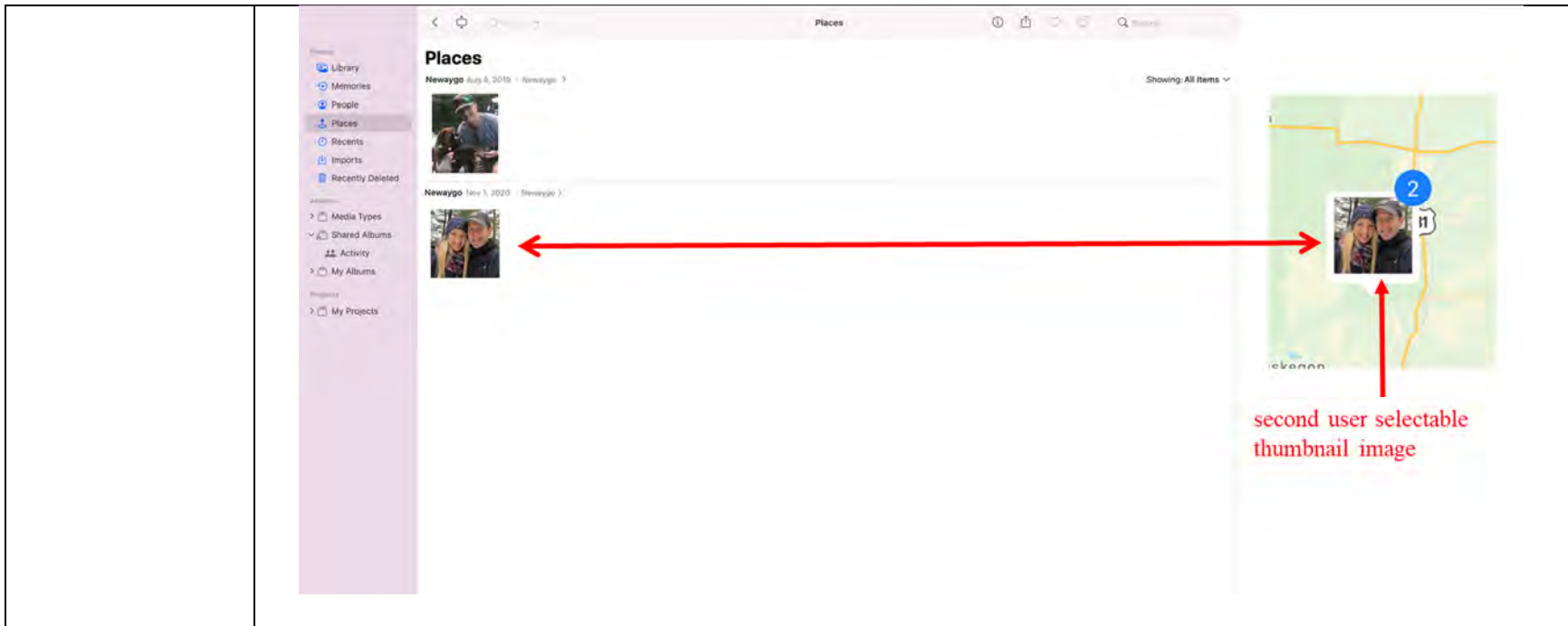
	 <p>The screenshot shows a dark-themed macOS interface. At the top, there is a large photo of a dog. Below it, a 'People' section shows a circular profile picture of a man. Underneath, a 'Places' section displays a map of Huron-Mandaree National Forests in Newaygo, MI, United States. A red arrow points to a small photo icon on the map, which is labeled 'second map image' in a red-bordered box. To the right of the map, there is a 'Nearby Photos' section.</p>
<p><b>1[d][iv]</b> the displayed scaled replicas of each of the digital photographs or images or videos in the second set of digital files not being overlaid on the second map image and</p>	<p>The displayed scaled replicas of each of the digital photographs or images or videos in the second set of digital files are not overlaid on the second map image.</p>

	
<p><b>1[d][v]</b> the third screenshot of the video display device not including the interactive map.</p>	<p>The third screenshot of the video display device does not include the interactive map.</p>

	
<p><b>2[pre]</b> The computer-implemented method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>2[a]</b> the first user selectable thumbnail image includes a scaled representation of at least one of the digital images in</p>	<p>The first user selectable thumbnail image includes a scaled representation of at least one of the digital images in the first set of digital files.</p>

<p>the first set of digital files, and</p>	
<p><b>2[b]</b> wherein the second user selectable thumbnail image includes a scaled representation of at least one of the digital images in the second set of digital files.</p>	<p>The second user selectable thumbnail image includes a scaled representation of at least one of the digital images in the second set of digital files.</p>

Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS






# **Exhibit B.1**

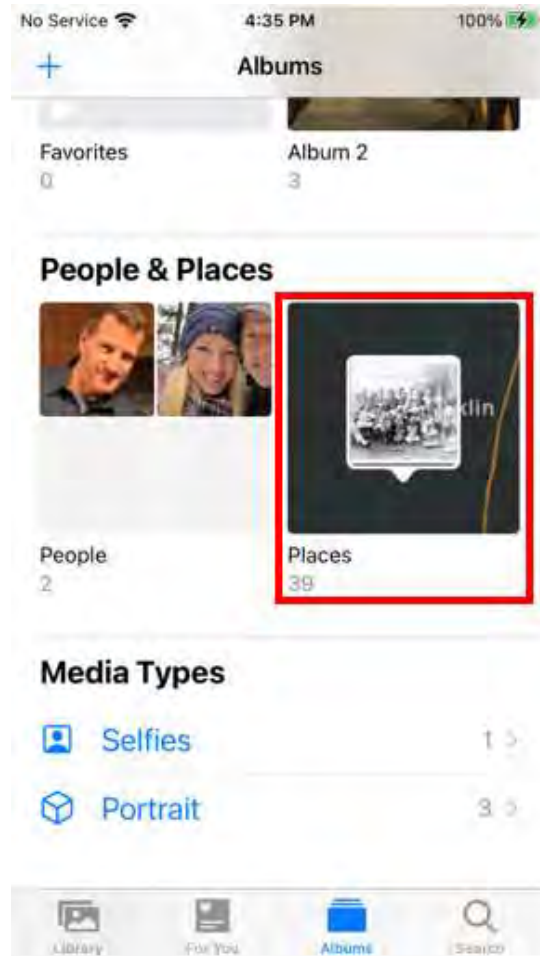
**U.S. Patent No. 10,423,658 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,423,658 (“the ‘658 patent”) in Apple iOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPhone 7 running iOS 14.7.1. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<p><b>1[pre]</b> A computer-implemented method of displaying at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or video was taken, the method comprising:</p>	<p>To the extent the preamble is limiting, iOS displays at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or video was taken. <i>See infra.</i></p> 

**1[a]** displaying an application view on a video display device including displaying a plurality of selectable elements, the plurality of selectable elements including a location selectable element;

iOS displays an application view on a video display device (e.g., an Apple iPhone) including a plurality of selectable elements. The plurality of selectable elements includes a location selectable element (Places).

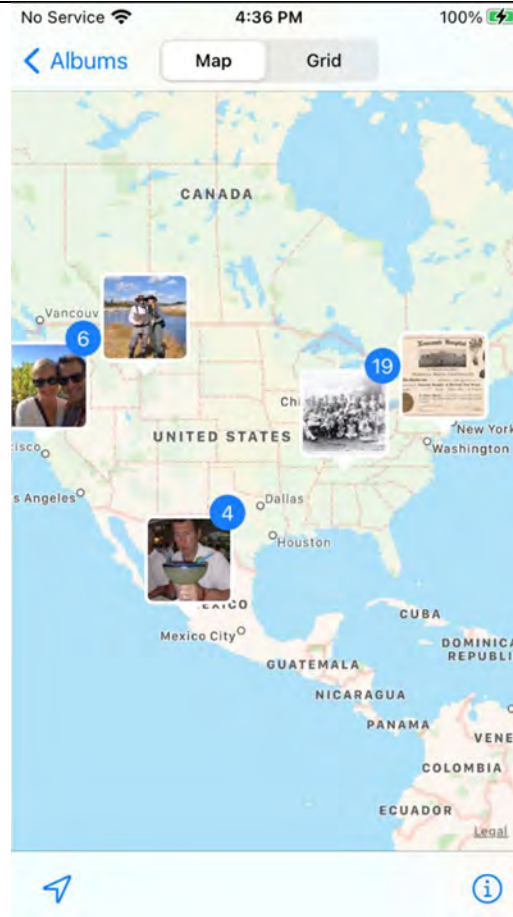


location selectable element

**1[b]** responsive to a click or tap of the location selectable element,

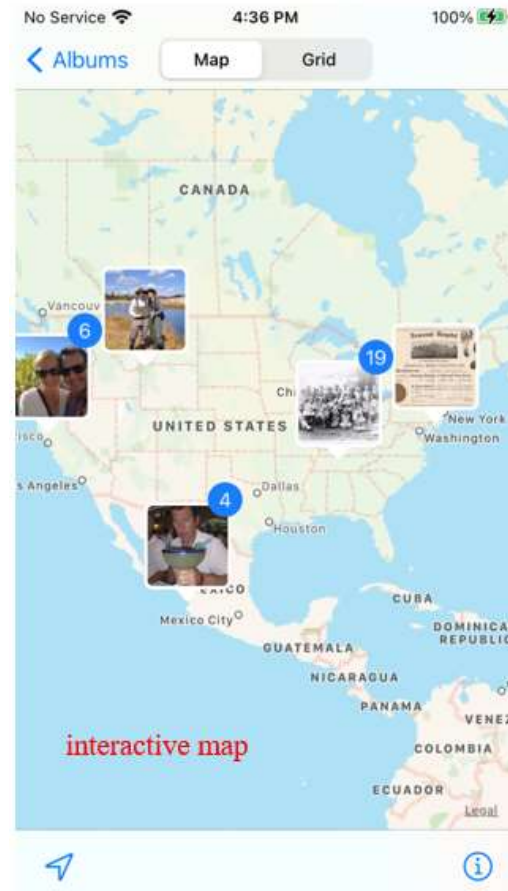
Responsive to a click or tap of the location selectable element, iOS displays a map view on a video display device (e.g., the Apple iPhone).

displaying a map view on a video display device, the displaying the map view including displaying:



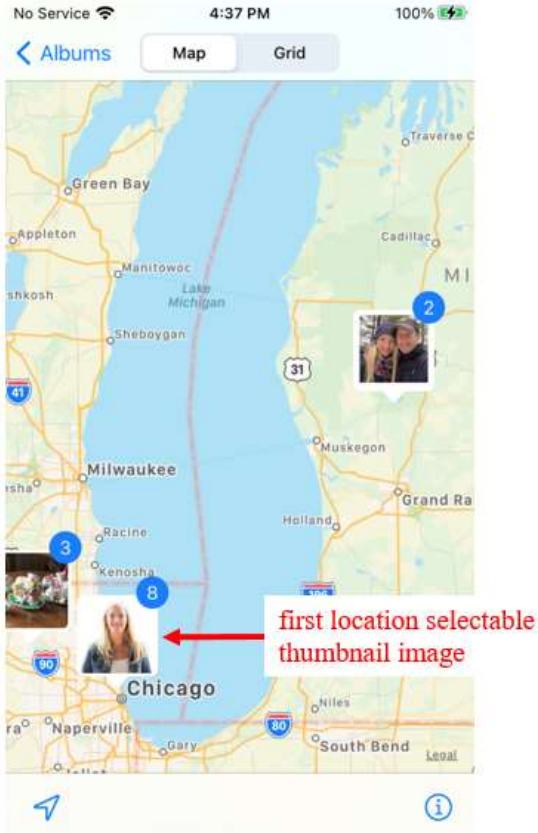
**1[b][i]** (i) a representation of an interactive map;

As shown below, the map view includes a representation of an interactive map.



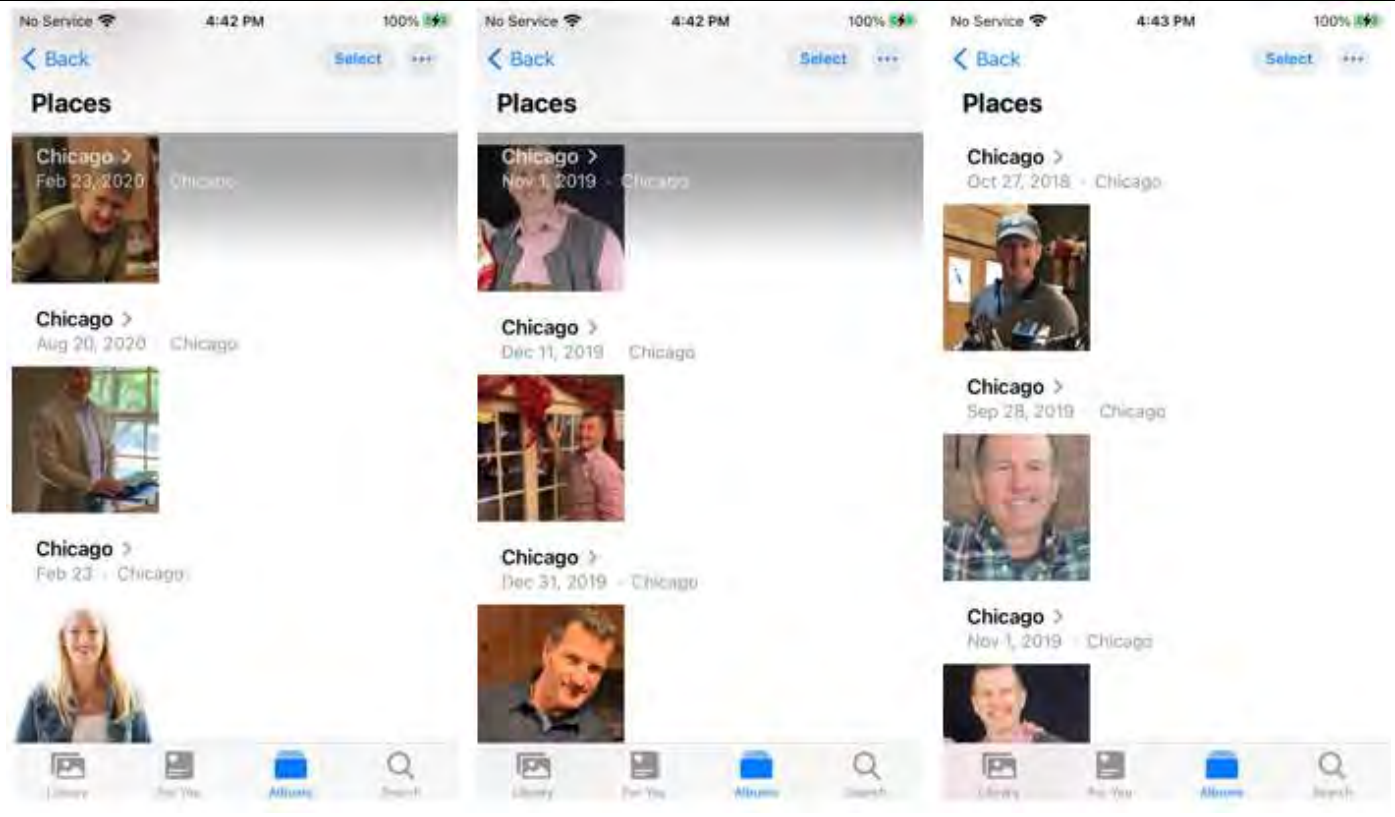
The map is interactive at least because a user can zoom in or out to see different locations, as shown below.

<p><b>1[b][iii]</b> (ii) a first location selectable thumbnail image at a first location on the interactive map, the first location being associated with the geographic</p>	<p>Displaying the map view includes displaying a first location selectable thumbnail image at a first location on the interactive map.</p>

<p>coordinates of a first geotag,</p>	 <p>The first location is associated with the geographic coordinates of a first geotag. In this example, the first location selection thumbnail is associated with Chicago. <i>See also</i> information for limitation 1[b][ii][A].</p>
<p><b>1[b][ii][A]</b> a first set of digital photographs and videos including all of the digital photographs and videos associated</p>	<p>The first location selectable thumbnail image is associated with a first set of digital photographs and videos including all of the digital photographs and videos associated with the first geotag. <i>See also</i> information for limitation 1[c].</p>



with the first geotag;



**1[b][iii]** (iii) a first count value image partially overlapping the first location selectable thumbnail image, the first count value image including a first number that

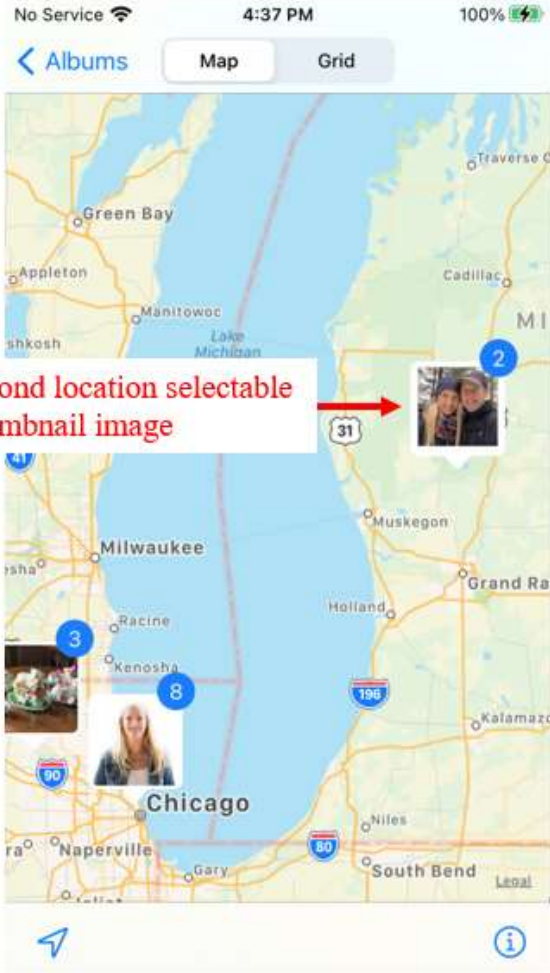
Displaying the map view includes displaying a first count value image partially overlapping the first location selectable thumbnail image. The first count value image including a first number (in this example, 8), which corresponds to the number of digital photographs and videos in the first set of photographs and videos.

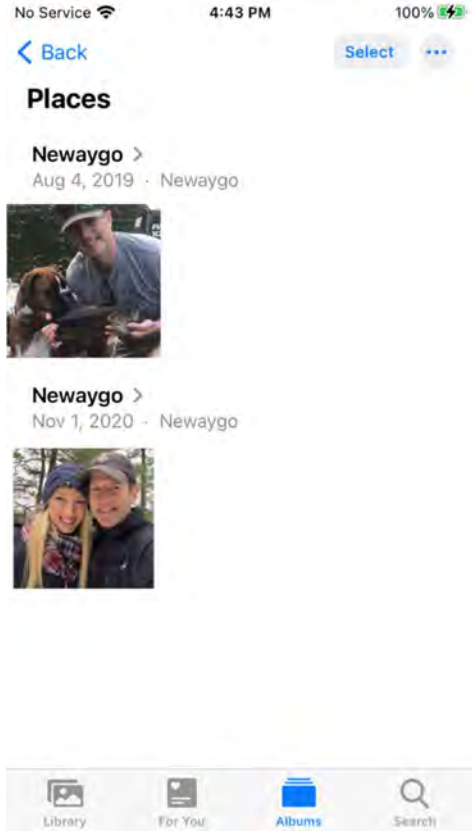
corresponds to the number of digital photographs and videos in the first set of digital photographs and videos;

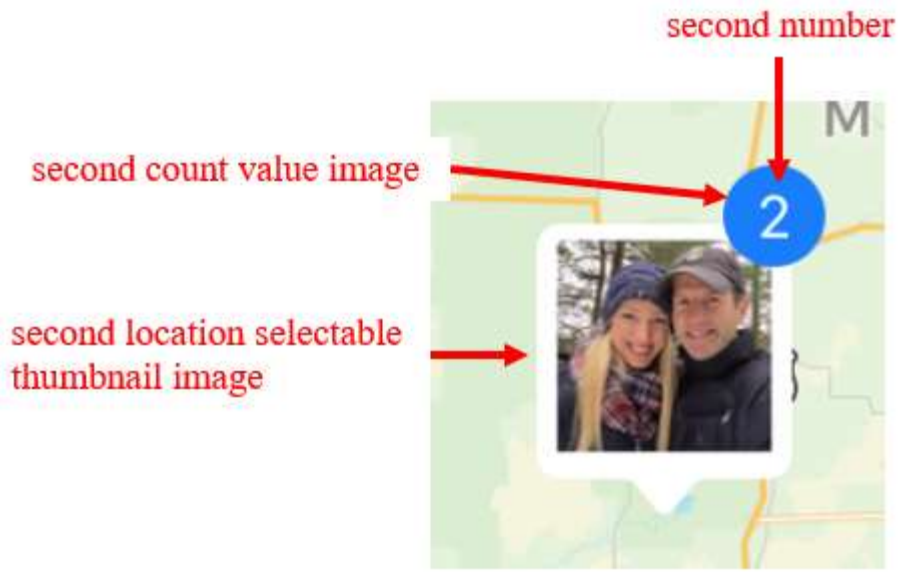


**1[b][iv]** (iv) a second location selectable thumbnail image at a second location on the interactive map, the second location being associated with the geographic coordinates of a second geotag,

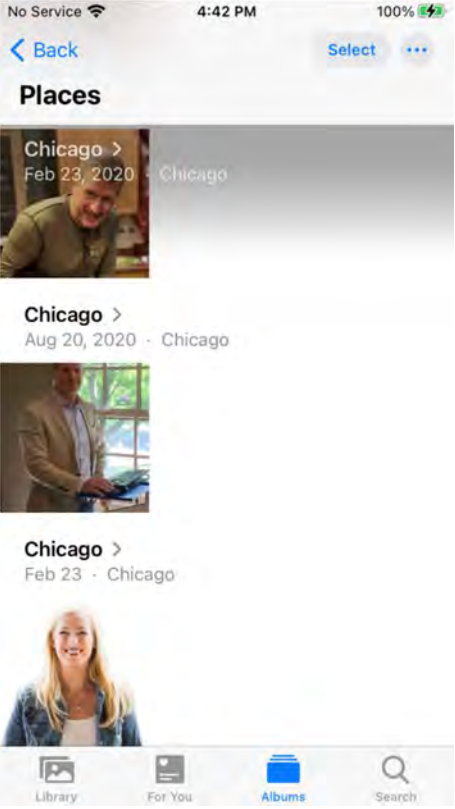
Displaying the map view includes displaying a second location selectable thumbnail image at a second location on the interactive map.


	 <p>The second location is associated with the geographic coordinates of a second geotag (in this example, Newaygo). <i>See also</i> information for 1[b][iv][A].</p>
<p><b>1[b][iv][A]</b> a second set of digital</p>	<p>The second location selectable thumbnail image is associated with a second set of digital photographs and videos including all of the digital photographs and videos associated with the second geotag (in this example, Newaygo). <i>See also</i> information for limitation 1[d].</p>

<p>photographs and videos including all of the digital photographs and videos associated with the second geotag; and</p>	 <p>The screenshot shows the 'Places' section of the Photos app. At the top, it says 'No Service', '4:43 PM', and '100%' battery. Below the status bar are 'Back', 'Select', and a menu icon. The 'Places' section lists two entries from 'Newyago': one from 'Aug 4, 2019' with a photo of a man and a dog, and another from 'Nov 1, 2020' with a photo of a man and a woman. At the bottom is a navigation bar with icons for Library, For You, Albums, and Search.</p>
<p><b>1[b][v]</b> (v) a second count value image partially overlapping the second location selectable thumbnail image, the second count value image including a second</p>	<p>Displaying the map view includes displaying a second count value image partially overlapping the second location selectable thumbnail image. The second count value image includes a second number (in this example, 2), which corresponds to the number of digital photographs and videos in the second set of digital photographs and videos.</p>

<p>number that corresponds to the number of digital photographs and videos in the second set of digital photographs and videos;</p>	 <p>The diagram shows a map interface. A red arrow labeled "second number" points to a blue circular pin containing the number "2". Another red arrow labeled "second count value image" points to the same pin. A third red arrow labeled "second location selectable thumbnail image" points to a white-bordered thumbnail image of a man and a woman, which is overlaid on the map.</p>
<p><b>1[c]</b> responsive to a click or tap of the first location selectable thumbnail image, displaying a first location view on the video display device, the displaying the first location view including displaying</p>	<p>Responsive to a click of the first location selectable thumbnail image, iOS displays a first location view on the video display device.</p>

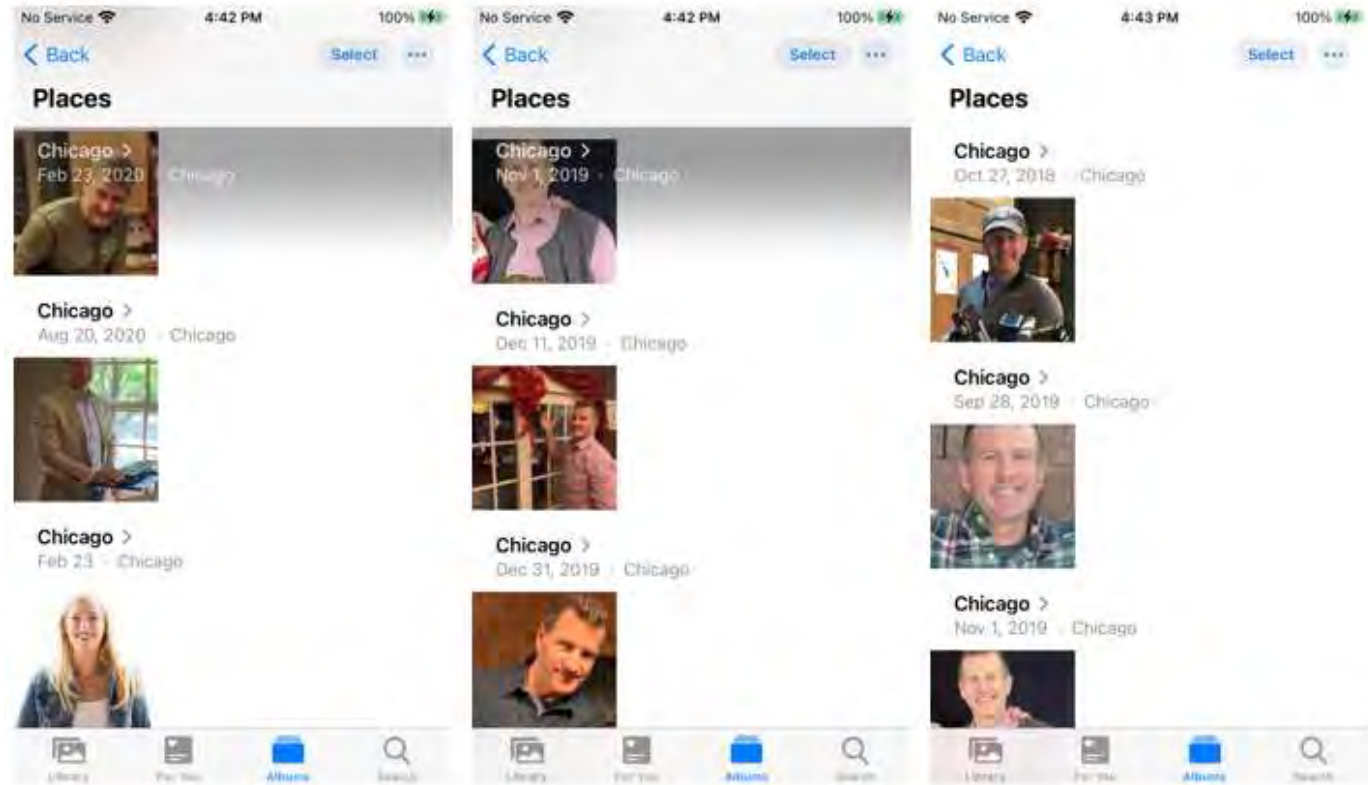
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – Apple iOS

	 <p>The screenshot shows the 'Places' section of the Photos app. At the top, it says 'Places' and 'Chicago &gt;'. Below this, there are three photo thumbnails, each with a 'Chicago &gt;' label and a date: 'Feb 23, 2020 - Chicago', 'Aug 20, 2020 - Chicago', and 'Feb 23 - Chicago'. The bottom navigation bar shows 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>1[c]i</b> (i) a first location name associated with the first geotag and</p>	<p>The first location view includes a first location name (in this example, Chicago) associated with the first geotag.</p>

	 <p>The screenshot shows the 'Places' section of the Photos app. It lists three photo albums, each titled 'Chicago' with a right-pointing chevron. The first album is dated 'Feb 23, 2020' and shows a photo of a man. The second album is dated 'Aug 20, 2020' and shows a photo of a man in a suit. The third album is dated 'Feb 23' and shows a photo of a woman. Red boxes highlight the 'Chicago' text in each album title. A red arrow points to the first 'Chicago' title with the text 'first location name'.</p>
<p><b>1[c][iii]</b> ii) a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos, the displayed scaled replicas of each of the digital photographs and</p>	<p>The first location view includes a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos.</p>



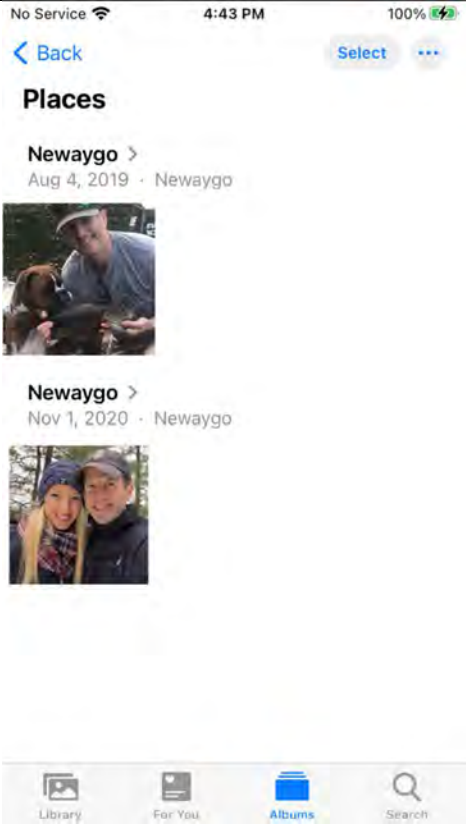
videos in the first set of digital photographs and videos not being overlaid on the interactive map; and




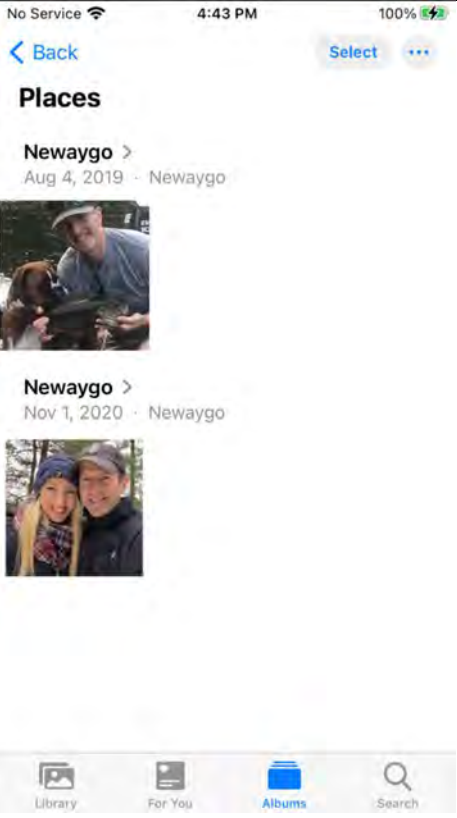
*See also* information for limitation 3[a]. As shown above, the displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos are not overlaid on the interactive map. *See* limitation 1[b][i].

**1[d]** responsive to a click or tap of the second location selectable thumbnail image, displaying a second location view on the video

Responsive to a click or tap of the second location selectable thumbnail image, iOS displays a second location view on the video display device (e.g., Apple iPhone).

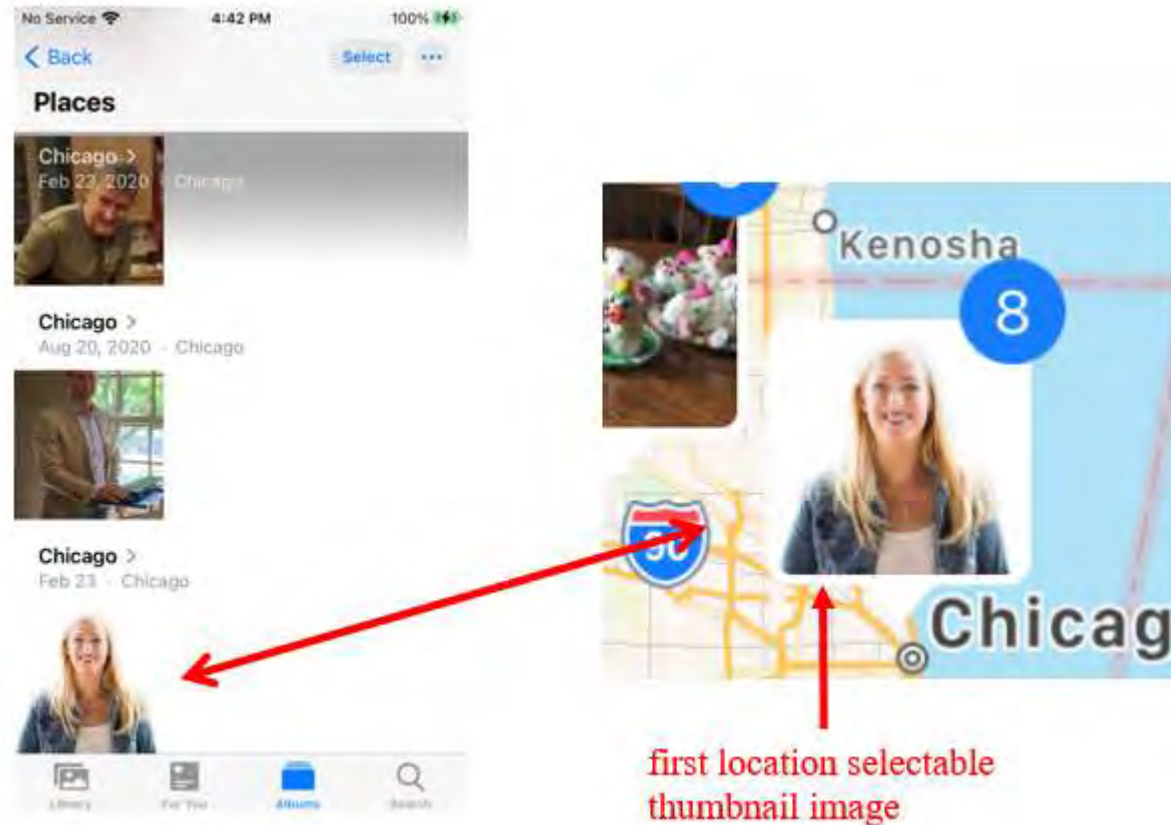
<p>display device, the displaying the second location view including displaying</p>	
<p><b>1[d][i]</b> (i) a second location name corresponding to the second geotag and</p>	<p>The second location view includes a second location name (in this example, Newwaygo) corresponding to the second geotag.</p>

	 <p>The screenshot shows the 'Places' section of the Photos app. At the top, it says 'No Service', '4:43 PM', and '100%' battery. Below are navigation options: '&lt; Back', 'Select', and a three-dot menu. The 'Places' section lists two entries for 'Newaygo'. The first entry is dated 'Aug 4, 2019' and features a photo of a man with a dog. The second entry is dated 'Nov 1, 2020' and features a photo of a man and a woman. Both 'Newaygo' labels are enclosed in red rectangular boxes. A red arrow points from the text 'second location name' to the 'Newaygo' label of the second entry. At the bottom, there are icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>1[d][ii]</b> (ii) a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos, the displayed scaled replicas of each of</p>	<p>The second location view also includes a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos.</p>

<p>the digital photographs and videos in the second set of digital photographs and videos not being overlaid on the interactive map.</p>	 <p>The screenshot shows an iPhone Photos app gallery. At the top, the status bar displays 'No Service', '4:43 PM', and '100%' battery. Below the status bar are navigation options: '&lt; Back', 'Select', and a three-dot menu. The gallery is titled 'Places' and contains two photo entries from 'Newwaygo'. The first entry is dated 'Aug 4, 2019' and shows a man with a dog. The second entry is dated 'Nov 1, 2020' and shows a man and a woman. At the bottom of the screen is a navigation bar with icons for 'Library', 'For You', 'Albums', and 'Search'.</p> <p>As shown above, the displayed scaled replicas of each of the digital photographs and videos in the second set of digital photographs and videos are not overlaid on the interactive map. <i>See</i> limitation 1[b][i].</p>
<p><b>2[pre]</b> The computer-implemented method of claim 1, wherein</p>	<p><i>See</i> information for claim 1.</p>

**2[a]** the first location selectable thumbnail image includes a scaled representation of at least one of the digital photographs in the first set of digital photographs, and

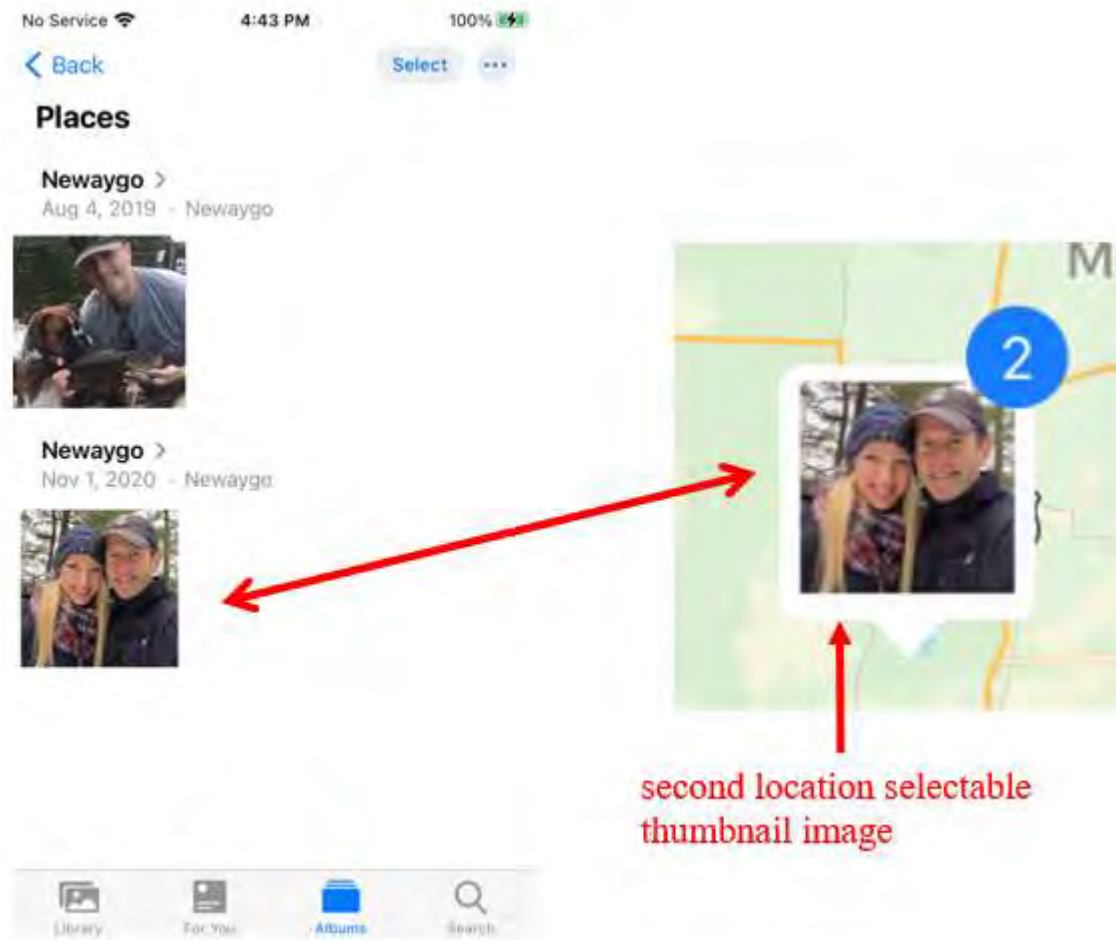
As shown below, the first location selectable thumbnail image (*see* limitation 1[b][ii]) includes a scaled representation of at least one of the digital photographs in the first set of digital photographs (*see* limitation 1[b][ii][A]).



**2[b]** and wherein the second location selectable thumbnail image includes a scaled representation of

The second location selectable thumbnail image (*see* limitation 1[b][iv]) includes a scaled representation of at least one of the digital photographs in the second set of digital photographs (*see* limitation 1[b][iv][A]).

at least one of the digital photographs in the second set of digital photographs.



**3[pre]** The computer-implemented method of claim 1, further comprising

See information for claim 1.

**3[a]** responsive to a click or tap of a

Responsive to a click or tap of one of the scaled replicas in the first location view (*see* limitation 1[c][ii]), iOS displays a first digital photograph associated with the first scaled replica.

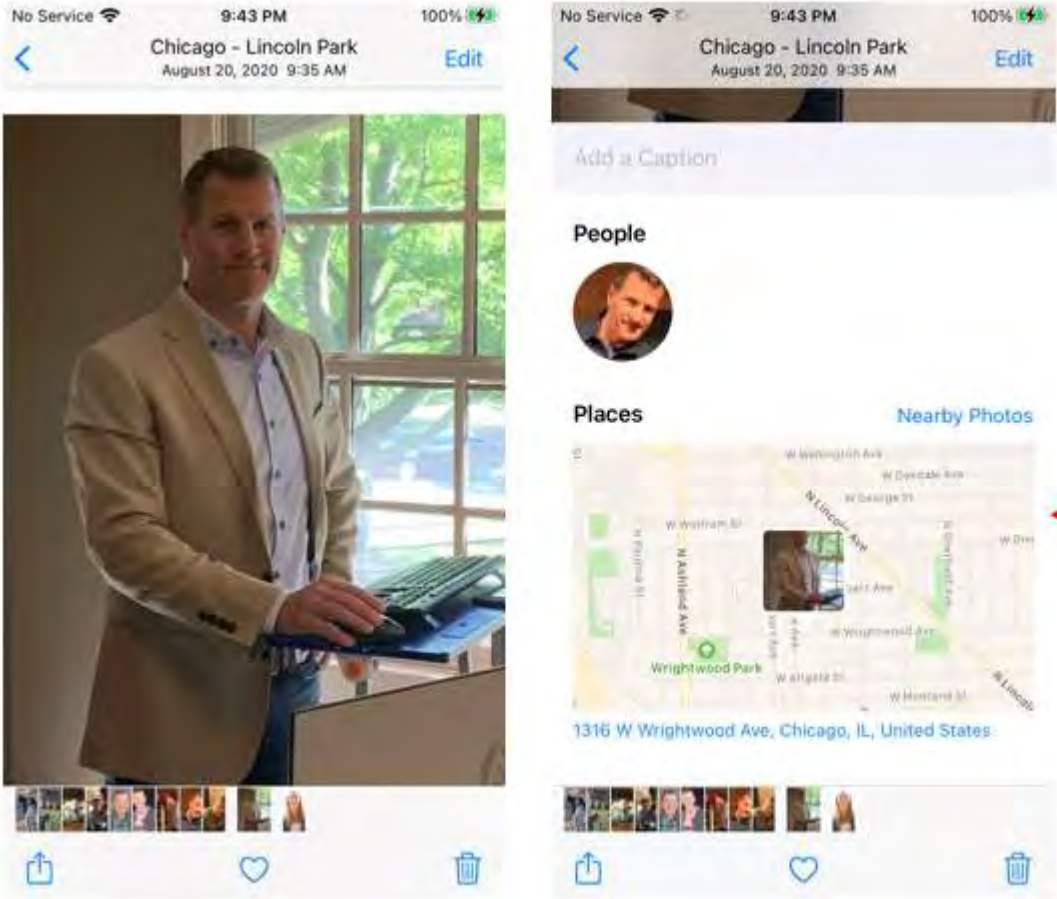
first one of the displayed scaled replicas in the first location view, displaying a first digital photograph associated with the first scaled replica in the first location view and





**3[b]** a first map image indicating the geographic coordinates of the first geotag.

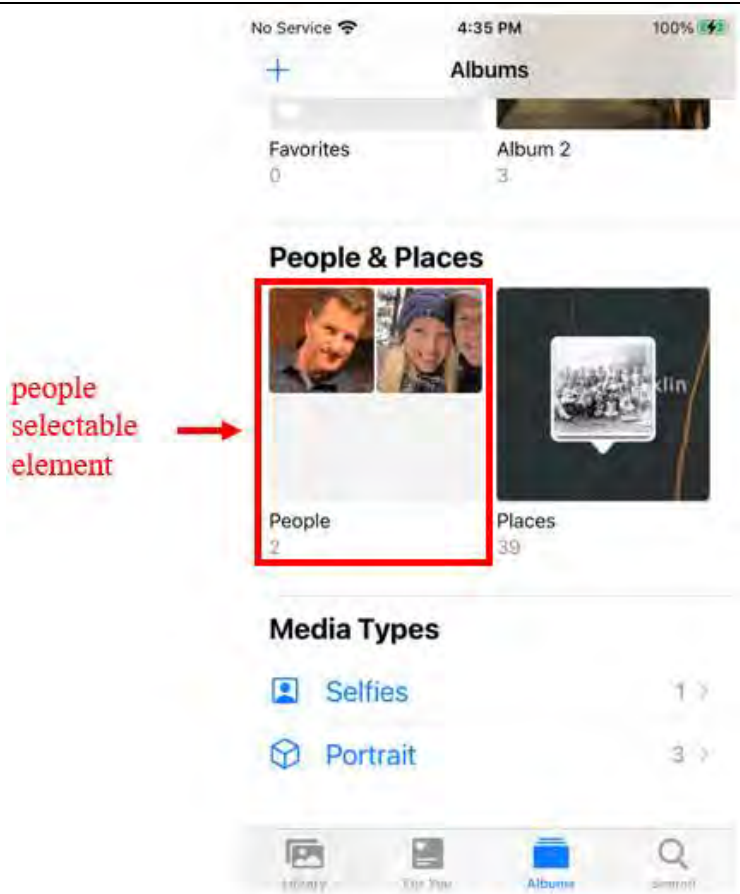
iOS also displays a first map image indicating the geographic coordinates of the first geotag below the first digital photograph, as shown below:

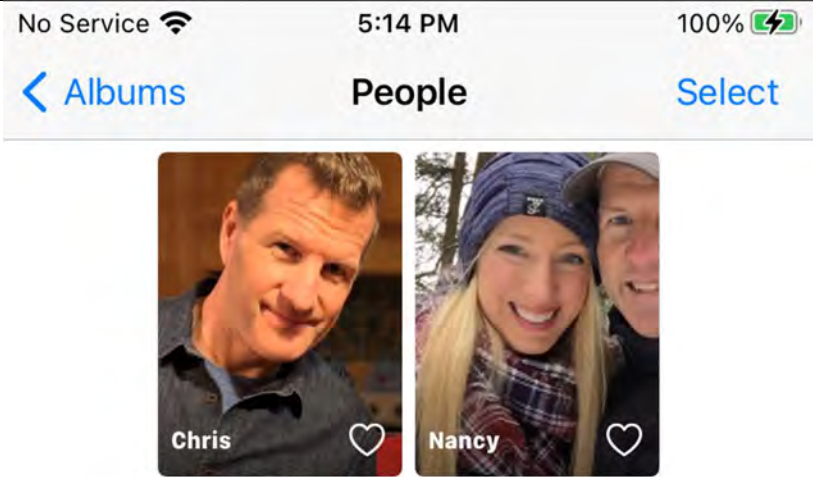
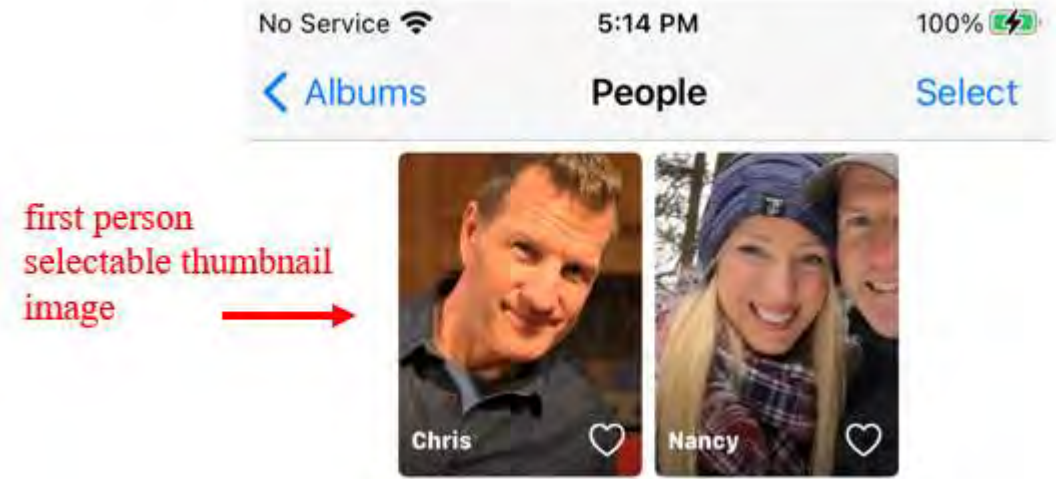


	
<p><b>4[pre]</b> The computer-implemented method of claim 3, further comprising</p>	<p><i>See information for claim 1.</i></p>
<p><b>4[a]</b> responsive to a click or tap of a</p>	<p>Responsive to a click or tap of one of the scaled replicas in the second location view, iOS displays a second digital photograph associated with the second scaled replica.</p>

<p>first one of the displayed scaled replicas in the second location view, displaying a first digital photograph associated with the first scaled replica in the second location view and</p>	
<p><b>4[b]</b> a second map image indicating the geographic coordinates of the second geotag.</p>	<p>iOS displays a second map image indicating the geographic coordinates of the second geotag below first digital photograph, as shown below.</p>

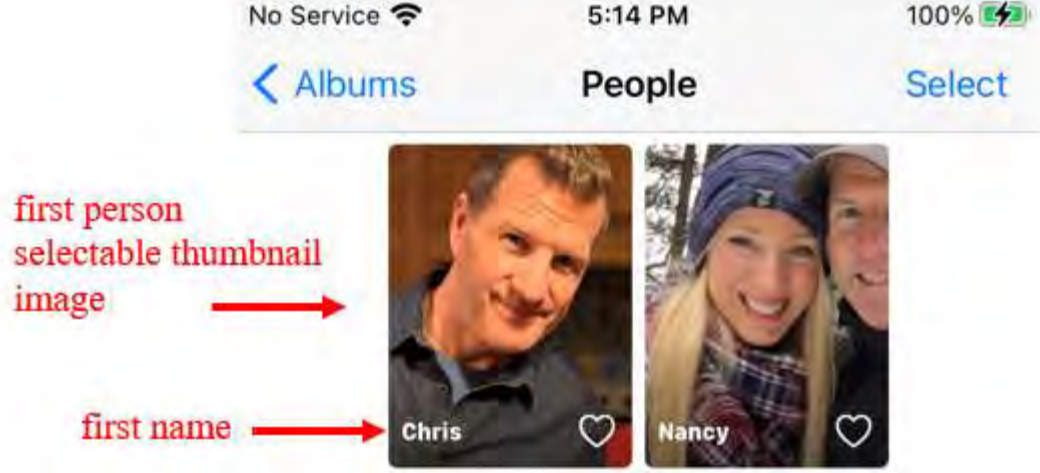
	 <p>The image shows two side-by-side screenshots of an iPhone photo gallery. Both screenshots show a photo of a man wearing a cap and sunglasses, smiling and holding a large fish, with a dog next to him. The status bar at the top of both screenshots shows 'No Service', '9:43 PM', and '100%' battery. The location is 'Brooks Township' and the date is 'August 5, 2019 12:00 AM'. The right screenshot shows a 'Nearby Photos' map overlay with a red arrow pointing to it and the text 'second map image'.</p>
<p><b>5[pre]</b> The computer-implemented method of claim 1,</p>	<p>See information for claim 1.</p>
<p><b>5[a]</b> wherein the plurality of selectable</p>	<p>The plurality of selectable elements in the application view (<i>see</i> limitation 1[a]) includes a people selectable element (labeled “People”), as shown below.</p>

<p>elements further includes a people selectable element,</p>	
<p><b>5[b]</b> the method further comprising responsive to a click or tap of the people selectable element, displaying a people view, the displaying the</p>	<p>iOS displays a people view responsive to a tap of the people selectable element.</p>

<p>people view including displaying:</p>	
<p><b>5[c]</b> (i) a first person selectable thumbnail image including an image of a face of a first person, a third set of digital photographs and videos including digital photographs and videos associated with the first person;</p>	<p>The people view includes a first person selectable thumbnail image including an image of a face of a first person:</p>  <p>The first person selectable thumbnail image is associated with a third set of digital photographs and videos. <i>See also</i> information for claim 7.</p>

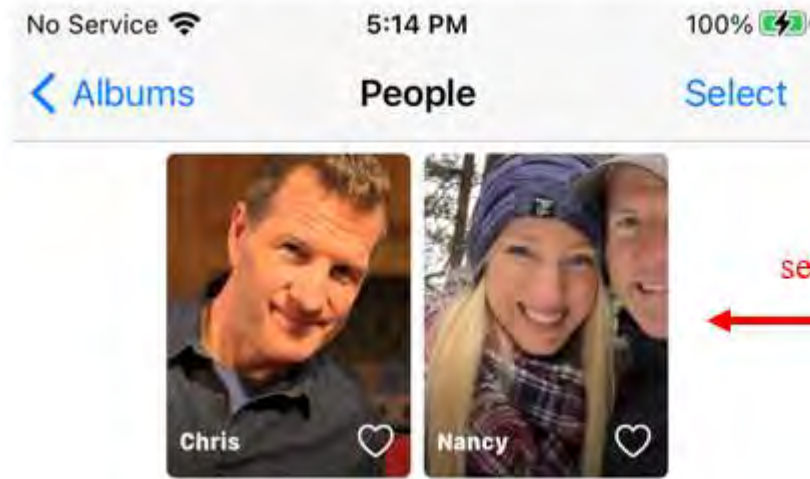


<p><b>5[d]</b> (ii) a name associated with the first person, the name associated with the first person being displayed adjacent to the first person selectable thumbnail image;</p>	<p>The people view includes a name associated with the first person displayed adjacent to the first person selectable thumbnail image, as shown below:</p>

	 <p>The screenshot shows the 'People' view in an iOS photo gallery. At the top, the status bar displays 'No Service', '5:14 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Albums', 'People', and 'Select'. Two person thumbnails are visible. The first thumbnail shows a man's face, and the second shows a woman's face. Below each thumbnail is the person's name: 'Chris' and 'Nancy'. Red arrows point from the text 'first person selectable thumbnail image' to the first thumbnail, and from 'first name' to the name 'Chris'.</p> <p>To the extent it is found that the name associated with the first person is not literally displayed adjacent to the first person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the name associated with the first person is to communicate the name of the first person that is associated with the first person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the name associated with the first person in sufficient proximity to the first person selectable thumbnail image such that a user will associate the name associated with the first person with the first person selectable thumbnail image. The result of the claimed displaying is that the name associated with the first person is associated with the first person selectable thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>5[e]</b> (iii) a second person selectable thumbnail image including an image of a face of a second person, a fourth set of digital photographs and</p>	<p>The people view includes a second person selectable thumbnail image including an image of a face of a second person:</p>

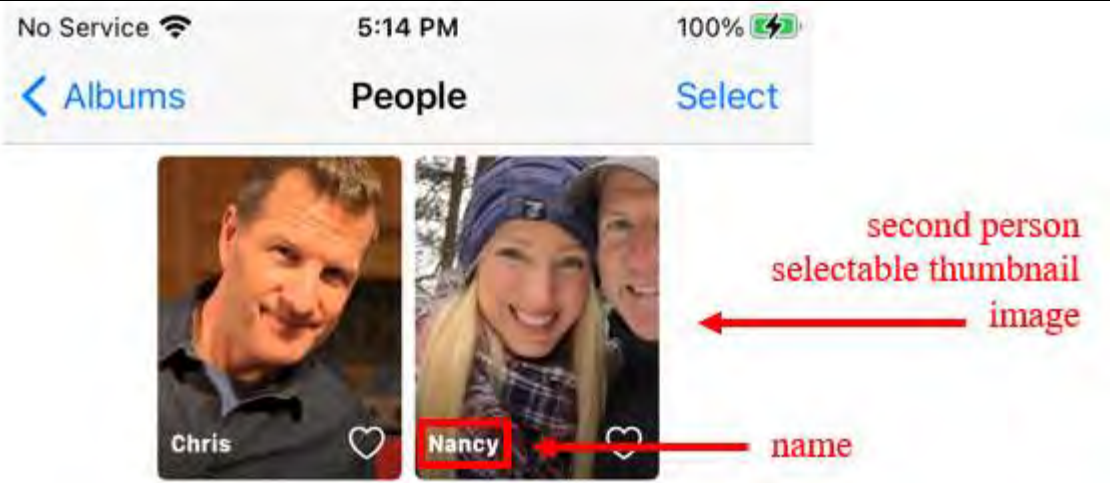


videos including digital photographs and videos associated with the second person; and

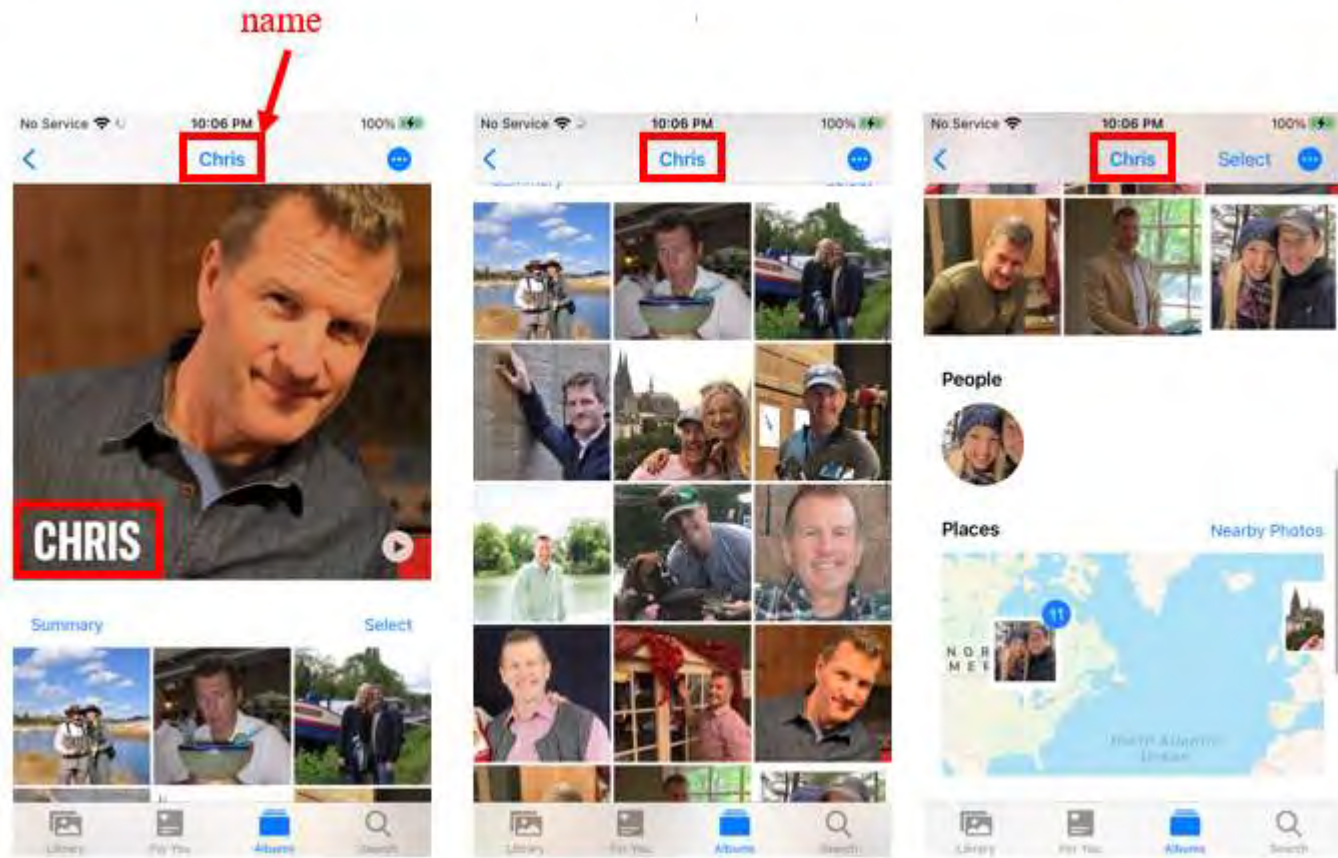


The second person selectable thumbnail image is associated with a fourth set of digital photographs and videos. *See also* information for claim 10.

	<p>The image contains two side-by-side screenshots of an iPhone photo gallery interface. Both screenshots show the top status bar with 'No Service', '10:06 PM', and '100%' battery. The left screenshot is titled 'Nancy' and shows a grid of six photos. Below the grid is a 'Summary' header, a 'Select' button, a profile picture of a woman, and a 'People' section with a profile picture of a man. The right screenshot is also titled 'Nancy' and shows a profile picture of the same woman, a 'People' section with the same man's profile picture, a 'Places' section with a map of North America and a 'Nearby Photos' section, and a 'Related' section. Both screenshots have a bottom navigation bar with 'Library', 'For You', 'Albums', and 'Search' icons.</p>
<p><b>5[f]</b> (iv) a name associated with the second person, the name associated with the second person being displayed adjacent to the second person selectable thumbnail image.</p>	<p>The people view also includes a name associated with the second person displayed adjacent to the second person selectable thumbnail image, as shown below:</p>

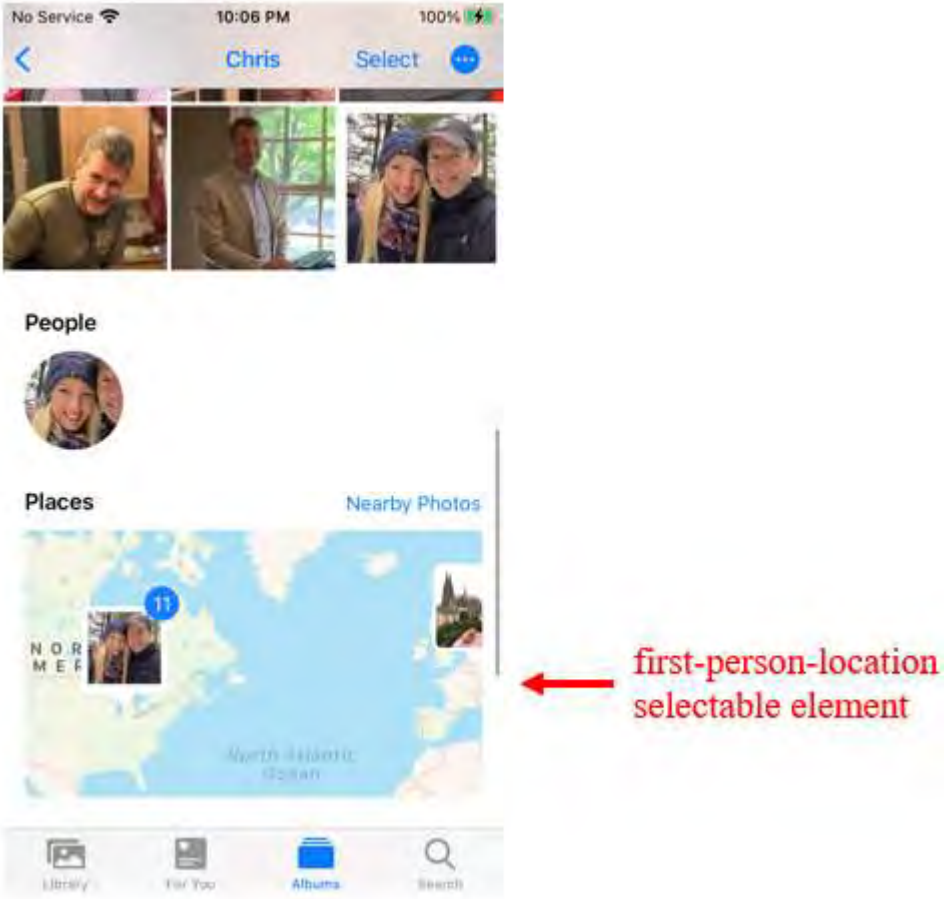
	 <p data-bbox="474 706 1894 1063">To the extent it is found that the name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the name associated with the second person is to communicate the name of the second person that is associated with the second person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the name associated with the second person in sufficient proximity to the second person selectable thumbnail image such that a user will associate the name associated with the second person with the second person selectable thumbnail image. The result of the claimed displaying is that the name associated with the second person is associated with the second person selectable thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p data-bbox="201 1144 453 1424"><b>7.</b> The computer-implemented method of claim 5, further comprising responsive to a click or tap of the first person selectable</p>	<p data-bbox="474 1144 1818 1250">iOS displays a first person view is displayed responsive to a click or tap of the first person selectable thumbnail image. As shown, the first person view includes the name associated with the first person and scaled replicas of the photos and videos in the third set of digital photographs.</p>

thumbnail image, displaying a first person view, the displaying the first person view including displaying (i) the name associated with the first person and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs.

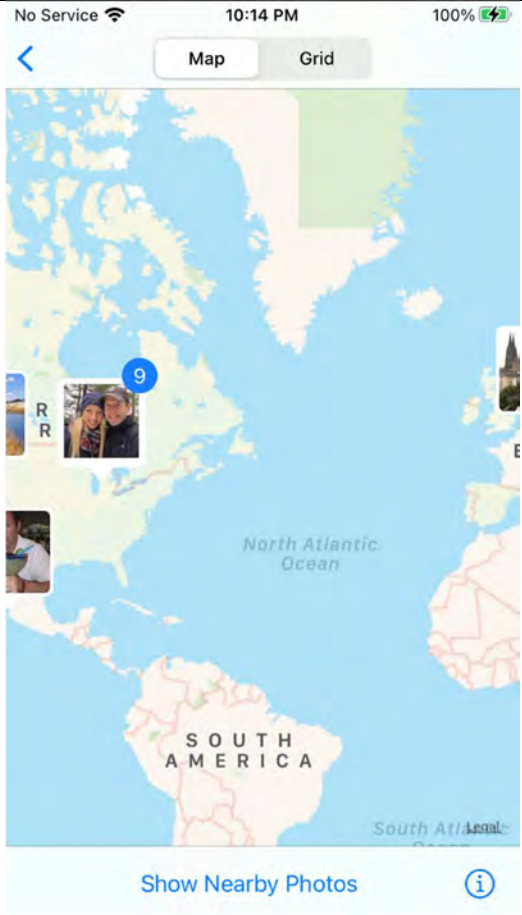


8. The computer-implemented method of claim 7, wherein the displaying the first person view further includes displaying a first-

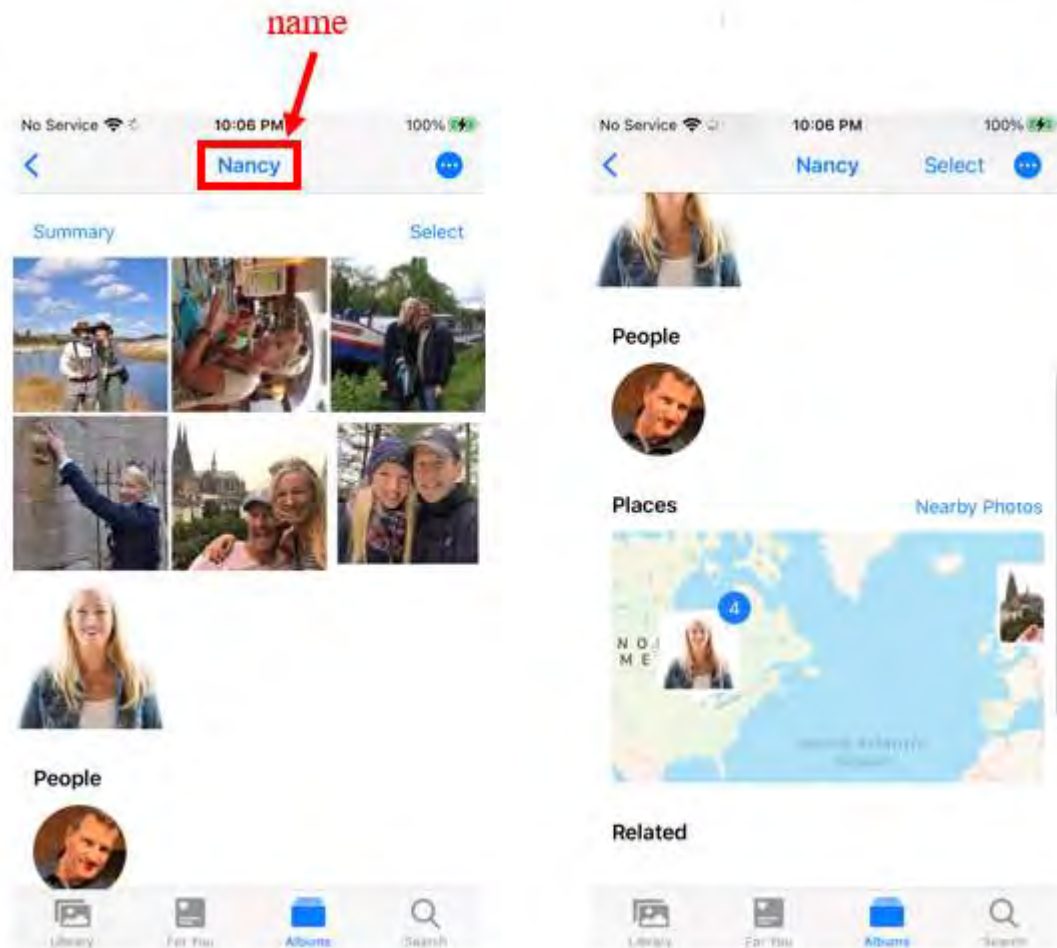
As shown below, the first person view includes a first-person-location selectable element below the scaled replicas.

<p>person-location selectable element.</p>	 <p>The screenshot shows an iOS photo gallery interface. At the top, there are three photo thumbnails. Below them is a 'People' section with a circular profile picture. Underneath is a 'Places' section featuring a map of the North Atlantic Ocean. A red arrow points to a photo pin on the map, which is labeled 'first-person-location selectable element'. The bottom of the screen shows the standard iOS navigation bar with icons for Library, For You, Albums, and Search.</p>
<p>9. The computer-implemented method of claim 8, further comprising responsive to a click or tap of the first-person-</p>	<p>Responsive to a click or tap of the first-person-location selectable element, iOS displays a representation of locations having a digital photograph or video associated with the first person, as shown below.</p>



<p>location selectable element, displaying a representation of all locations having a digital photograph or video associated with the first person.</p>	
<p><b>10.</b> The computer-implemented method of claim 7, further comprising responsive to a click or tap of the second person selectable</p>	<p>iOS displays a second person view responsive to a click or tap of the second person selectable thumbnail image. As shown, the second person view includes the name associated with the second person and a scaled replica of the photos and videos in the fourth set of digital photographs.</p>

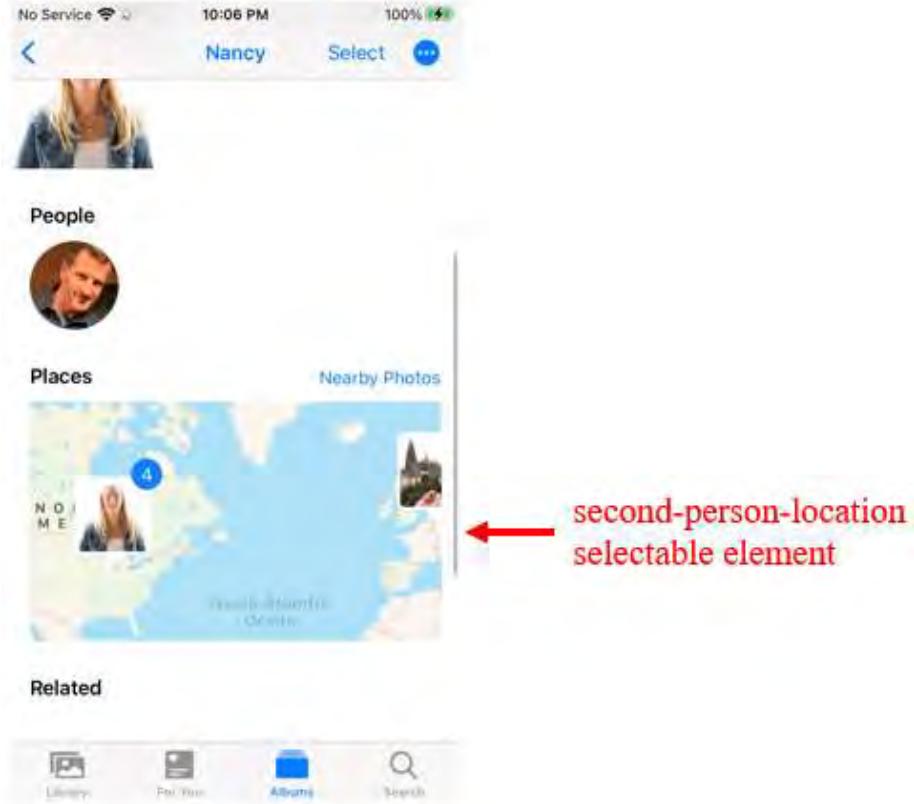
thumbnail image, displaying a second person view, the displaying the second person view including displaying (i) the name associated with the second person and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs.

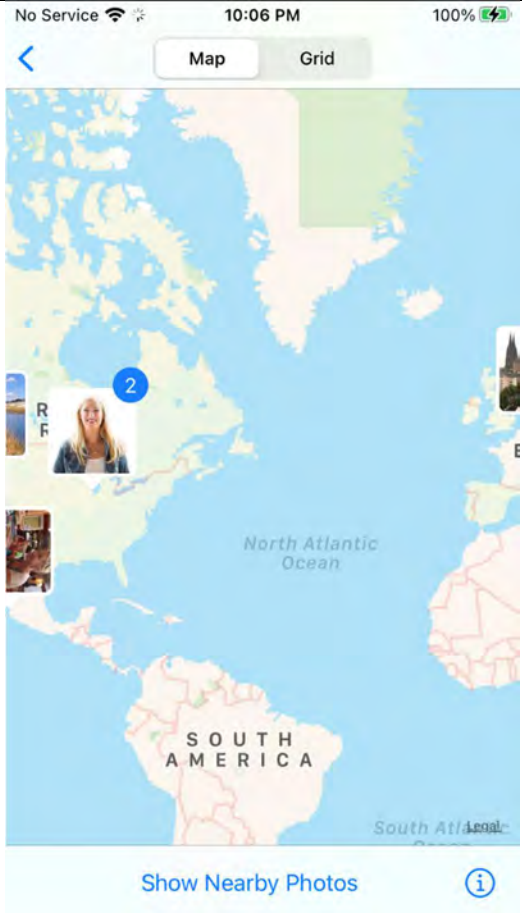


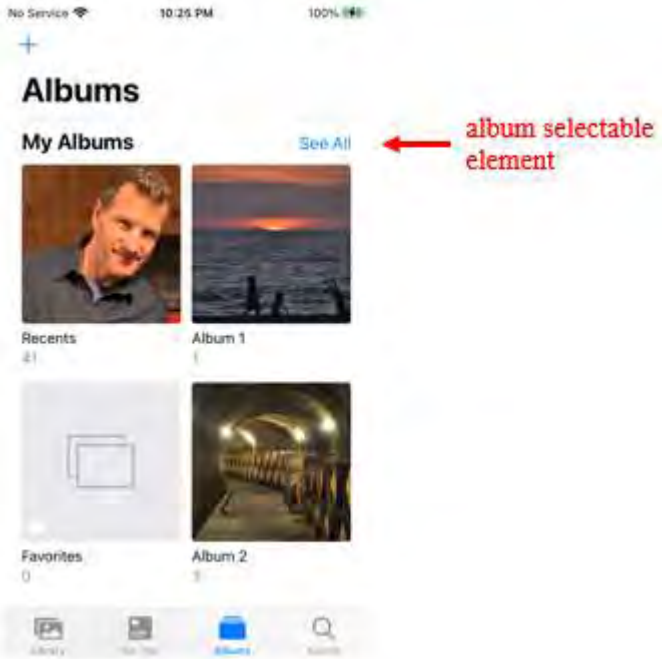
**11.** The computer-implemented method of claim 10, wherein the displaying the second person

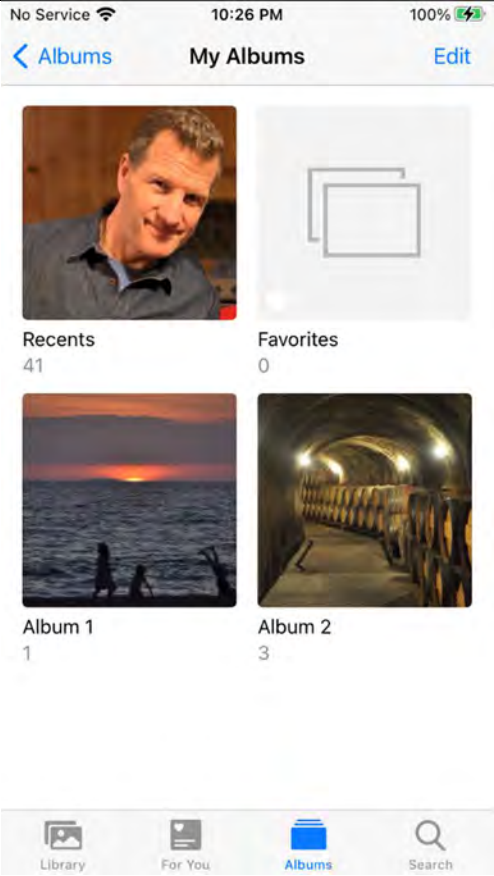
As shown below, the second person view includes a second-person-location selectable element below the scaled replicas.



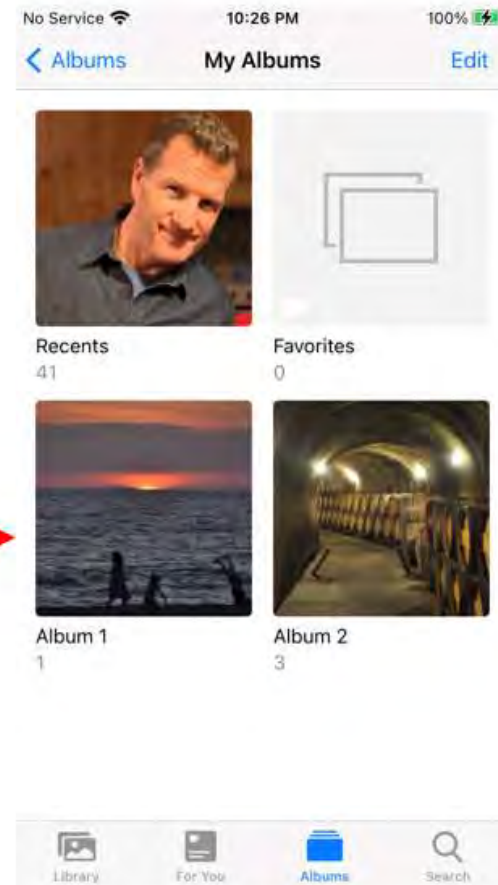
<p>view further includes displaying a second-person-location selectable element.</p>	 <p>The screenshot shows an iOS photo gallery interface. At the top, the status bar displays 'No Service', '10:06 PM', and '100%' battery. Below the status bar, there is a navigation bar with a back arrow, the name 'Nancy', and a 'Select' button. The main content area is divided into sections: 'People' with a circular profile picture, 'Places' with a map showing a location pin and a small photo thumbnail, and 'Related' with a search icon. A red arrow points to the map area with the text 'second-person-location selectable element'.</p>
<p><b>12.</b> The computer-implemented method of claim 11, further comprising responsive to a click or tap of the second-person-location selectable element,</p>	<p>Responsive to a click or tap of the second-person-location selectable element, iOS displays a representation of locations having a digital photograph or video associated with the second person.</p>

<p>displaying a representation of all locations having a digital photograph or video associated with the second person.</p>	
<p><b>13[pre]</b> The computer-implemented method of claim 1,</p>	<p><i>See</i> information for claim 1.</p>
<p><b>13[a]</b> wherein the plurality of selectable elements further</p>	<p>The plurality of selectable elements (<i>see</i> limitation 1[a]) further includes an album selectable element.</p>

<p>includes an album selectable element,</p>	
<p><b>13[b]</b> the method further comprising responsive to a click or tap of the album selectable element, displaying an album view, the displaying the album view including displaying:</p>	<p>iOS displays an album view responsive to a click or tap of the album selectable element.</p>

	
<p><b>13[c][i]</b> (i) a first album selectable thumbnail image including a scaled representation of at least one digital photograph in a third set of digital photographs and videos that</p>	<p>The album view includes a first album selectable thumbnail image.</p>

includes all of the digital photographs and videos associated with a first album tag;



first album selectable element →

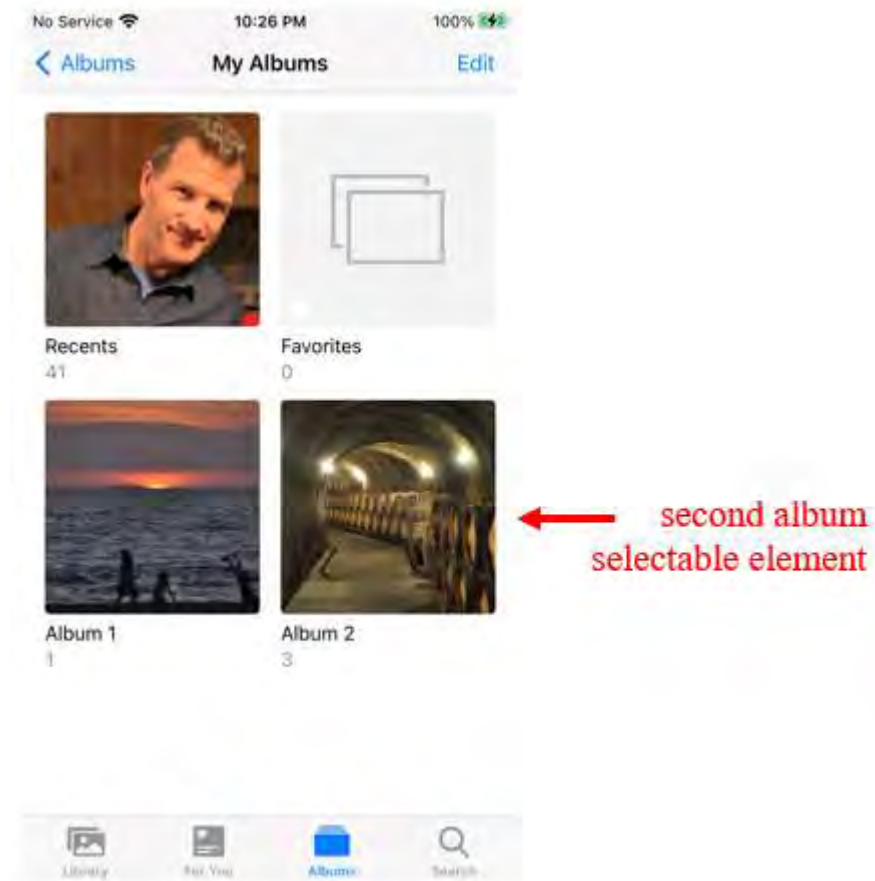
The first album selectable thumbnail includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag.

<p><b>13[c][ii]</b> (ii) a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image;</p>	<p>The album view also includes a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image.</p>

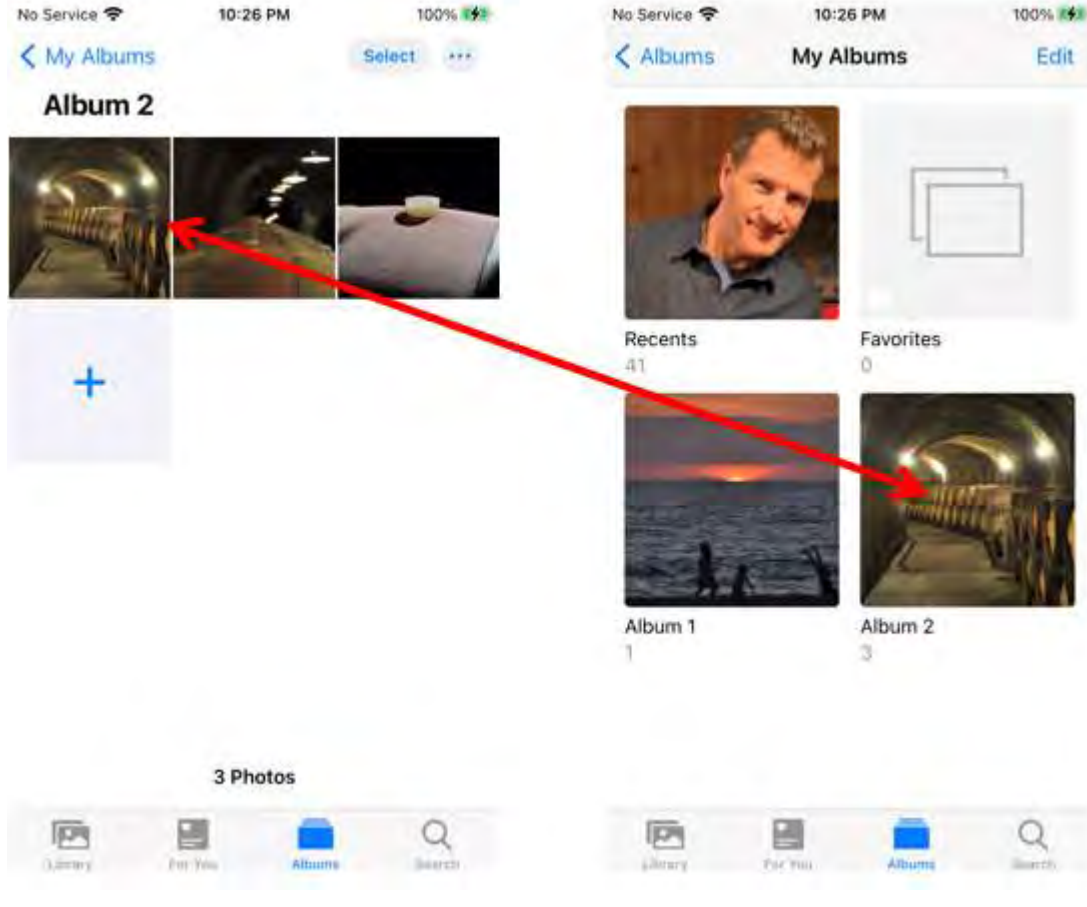
	<p>The screenshot shows the 'My Albums' interface on an iPhone. At the top, there is a status bar with 'No Service', '10:26 PM', and '100%' battery. Below that is a navigation bar with a back arrow, 'Albums', 'My Albums', and an 'Edit' button. The main content area displays a grid of album thumbnails. The first row has 'Recents' (41) and 'Favorites' (0). The second row has 'Album 1' (1) and 'Album 2' (3). Red arrows point from the text 'first album selectable element' and 'first album name' to the first album thumbnail in the second row.</p>
<p><b>13[c][iii]</b> (iii) a second album selectable thumbnail image including a scaled representation of at least one digital photograph in a fourth set of</p>	<p>The album view includes a second album selectable thumbnail image.</p>



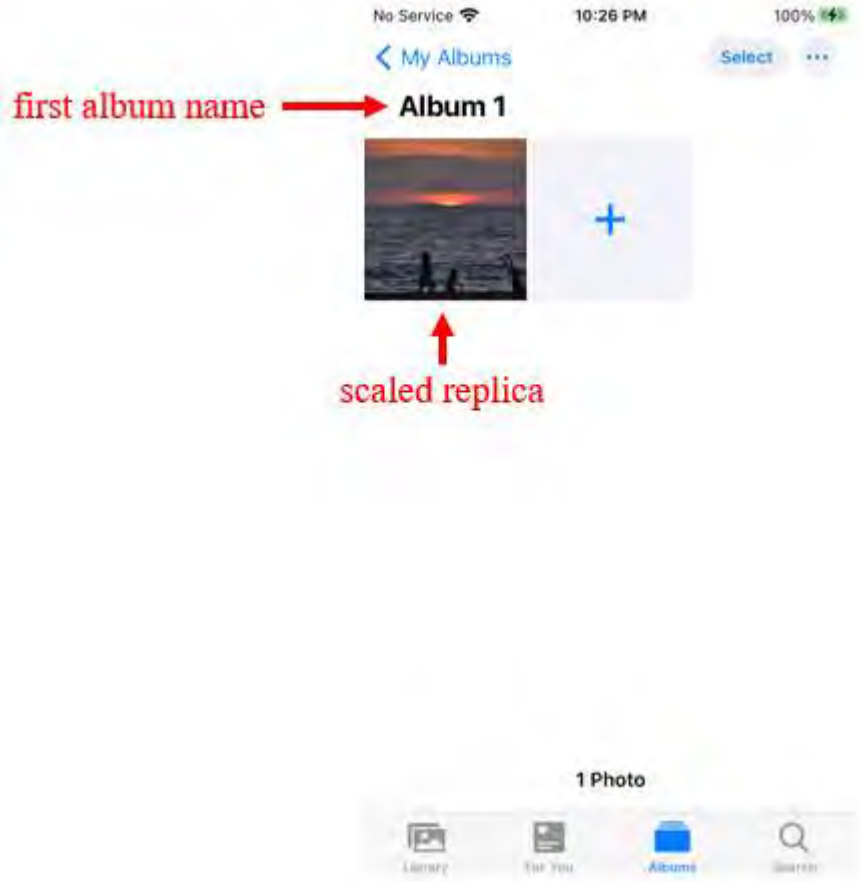
digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag; and



The second album selectable thumbnail image includes a scaled representation of at least one digital photograph in a fourth set of digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag.

	 <p>The image displays two screenshots of the Apple Photos app interface. The left screenshot shows the 'Album 2' view, which includes a header 'Album 2', three photo thumbnails, and a '+' button. The right screenshot shows the 'My Albums' view, which includes a header 'My Albums', a 'Recents' album with 41 photos, a 'Favorites' album with 0 photos, and two album thumbnails: 'Album 1' with 1 photo and 'Album 2' with 3 photos. A red arrow points from the second thumbnail in 'Album 2' to the 'Album 2' thumbnail in the 'My Albums' view.</p>
<p><b>13[c][iv]</b> (ii) a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p>	<p>The album view also includes a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p>

<p>album selectable thumbnail image.</p>	<p>The screenshot shows the 'My Albums' view in the iOS Photos app. At the top, there is a status bar with 'No Service', '10:26 PM', and '100%' battery. Below the status bar is a navigation bar with a back arrow, 'Albums', 'My Albums', and an 'Edit' button. The main content area displays a grid of album thumbnails. The first row shows 'Recents' with 41 items and 'Favorites' with 0 items. The second row shows 'Album 1' with 1 item and 'Album 2' with 3 items. Red arrows point to the 'Album 2' thumbnail and its label, with text labels 'second album selectable element' and 'second album name'.</p>
<p><b>14.</b> The computer-implemented method of claim 13, further comprising responsive to a click or tap of the first album</p>	<p><i>See</i> information for claim 13. Additionally, responsive to a click or tap of the first album selectable thumbnail image, iOS displays a first album view which includes the first album name associated with the first album and a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos.</p>

<p>selectable thumbnail image, displaying a first album view, the displaying the first album view including displaying (i) the first album name associated with the first album and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos.</p>	
<p><b>15.</b> The computer-implemented method of claim 14, further comprising responsive to a click or tap of the second album selectable</p>	<p><i>See</i> information for claim 14. Additionally, responsive to a click or tap of the second album selectable thumbnail image, a second album view is displayed which includes the second album name associated with the second album and a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs and videos.</p>

thumbnail image, displaying a second album view, the displaying the second album view including displaying (i) the second album name associated with the second album and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs and videos.

second album name

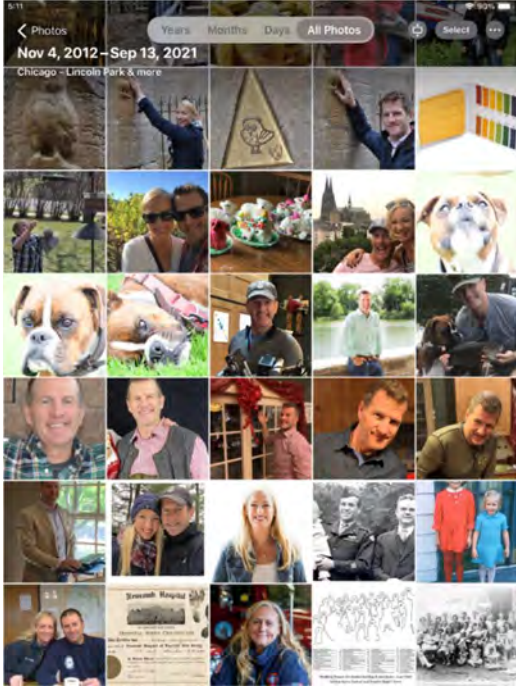


scaled replicas

# **Exhibit B.2**

**U.S. Patent No. 10,423,658 – Infringement Claim Chart**

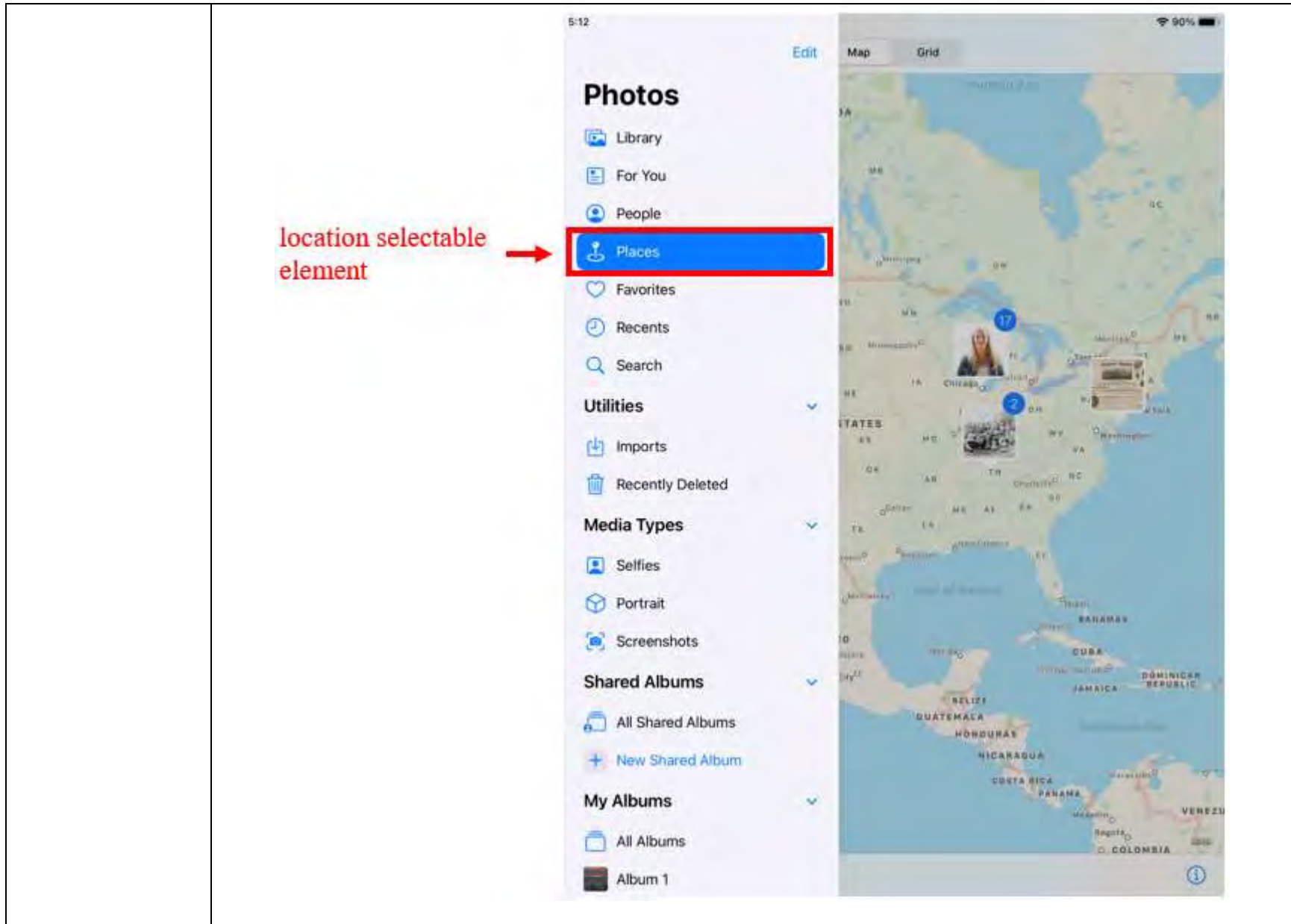
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,423,658 (“the ‘658 patent”) in Apple iPadOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPad mini (5<sup>th</sup> Generation) running iPadOS 14.6. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<p><b>1[pre]</b> A computer-implemented method of displaying at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or video was taken, the method comprising:</p>	<p>To the extent the preamble is limiting, iPadOS displays at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or video was taken. <i>See infra.</i></p>  <p>The screenshot shows the iPadOS Photos app interface. At the top, there are navigation options: 'Photos', 'Years', 'Months', 'Days', and 'All Photos'. Below this, a date range 'Nov 4, 2012 - Sep 13, 2021' is displayed, along with a location tag 'Chicago - Lincoln Park &amp; more'. The main area is a grid of various photographs, including portraits of people, dogs, and outdoor scenes, illustrating the application of geotags to digital content.</p>



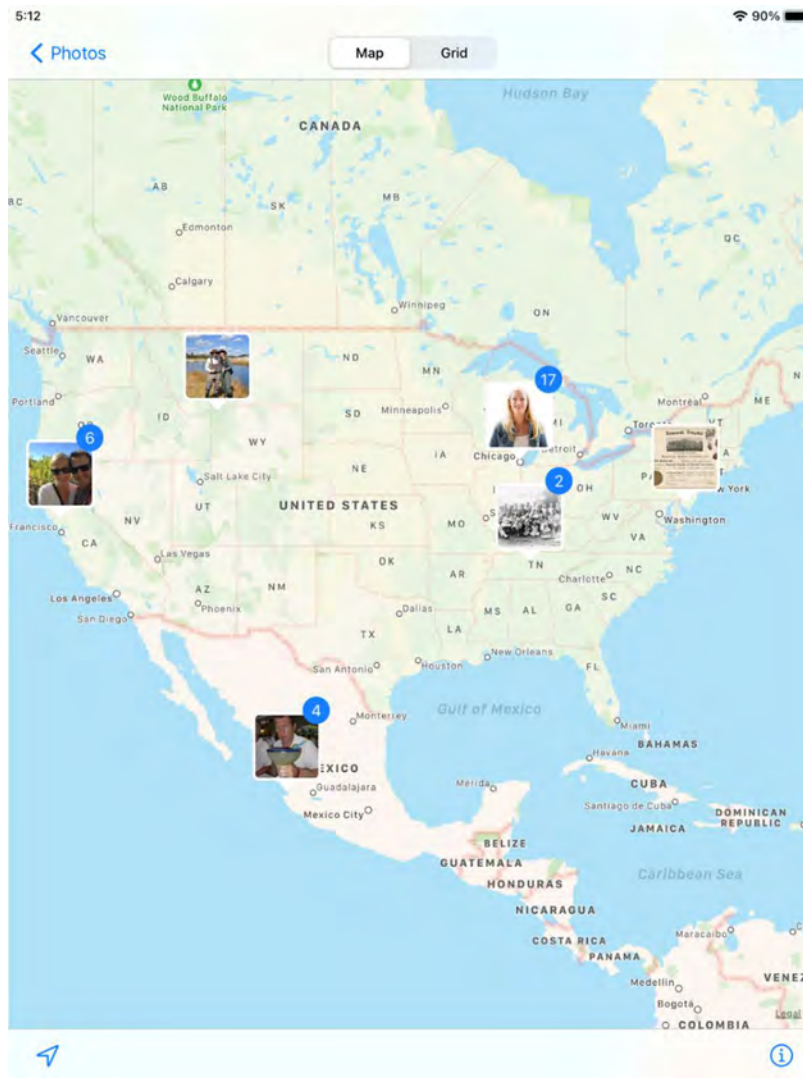
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

<p><b>1[a]</b> displaying an application view on a video display device including displaying a plurality of selectable elements, the plurality of selectable elements including a location selectable element;</p>	<p>iPadOS displays an application view on a video display device (e.g., an Apple iPad) including a plurality of selectable elements. The plurality of selectable elements includes a location selectable element (Places).</p>
--	--



1[b] responsive to a click or tap of the location selectable element, displaying a map view on a video display device, the displaying the map view including displaying:

Responsive to a tap of the location selectable element, iPadOS displays a map view on a video display device (e.g., the Apple iPad).

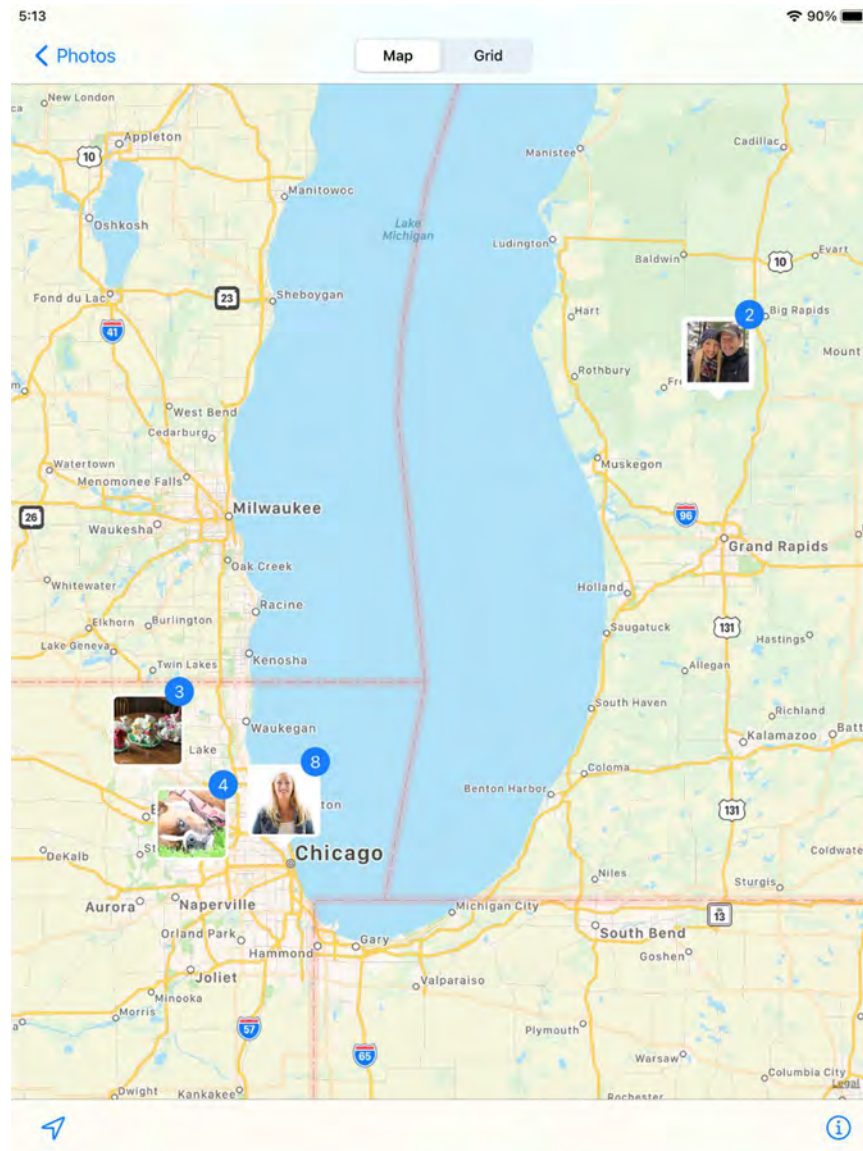


1[b][i] (i) a representation of an interactive map;

As shown below, the map view includes a representation of an interactive map.



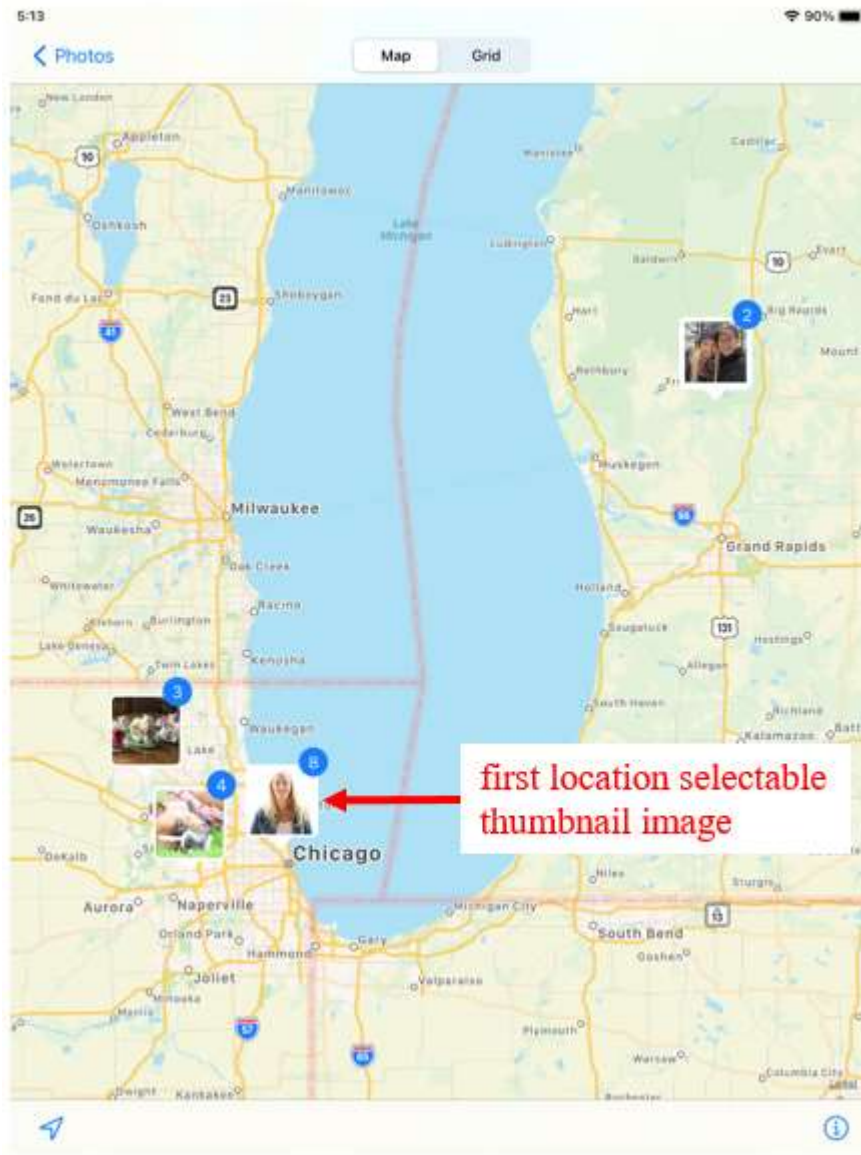
The map is interactive at least because a user can zoom in or out to see different locations, as shown below.





**1[b][ii]** (ii) a first location selectable thumbnail image at a first location on the interactive map, the first location being associated with the geographic coordinates of a first geotag,

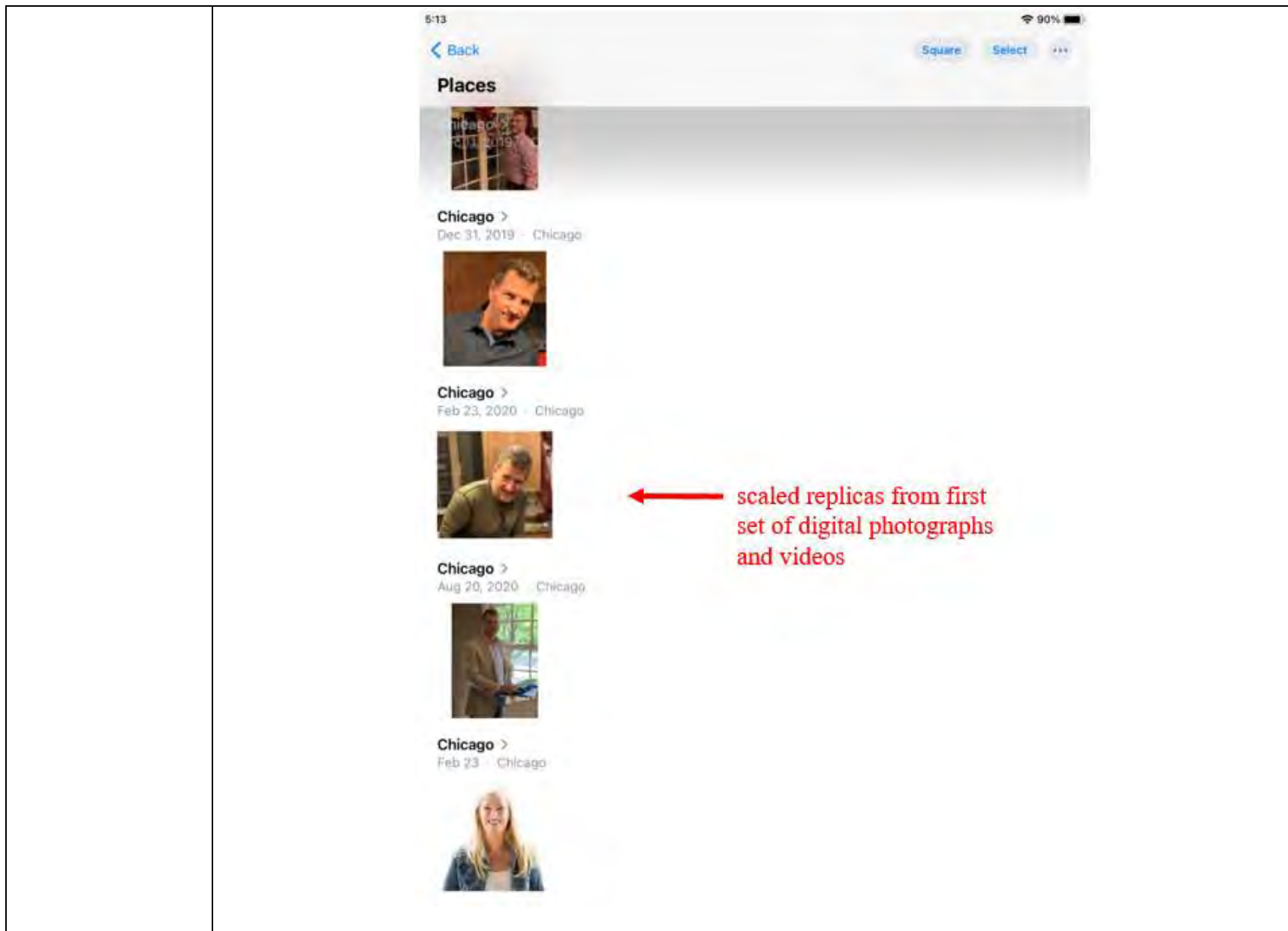
Displaying the map view includes displaying a first location selectable thumbnail image at a first location on the interactive map.




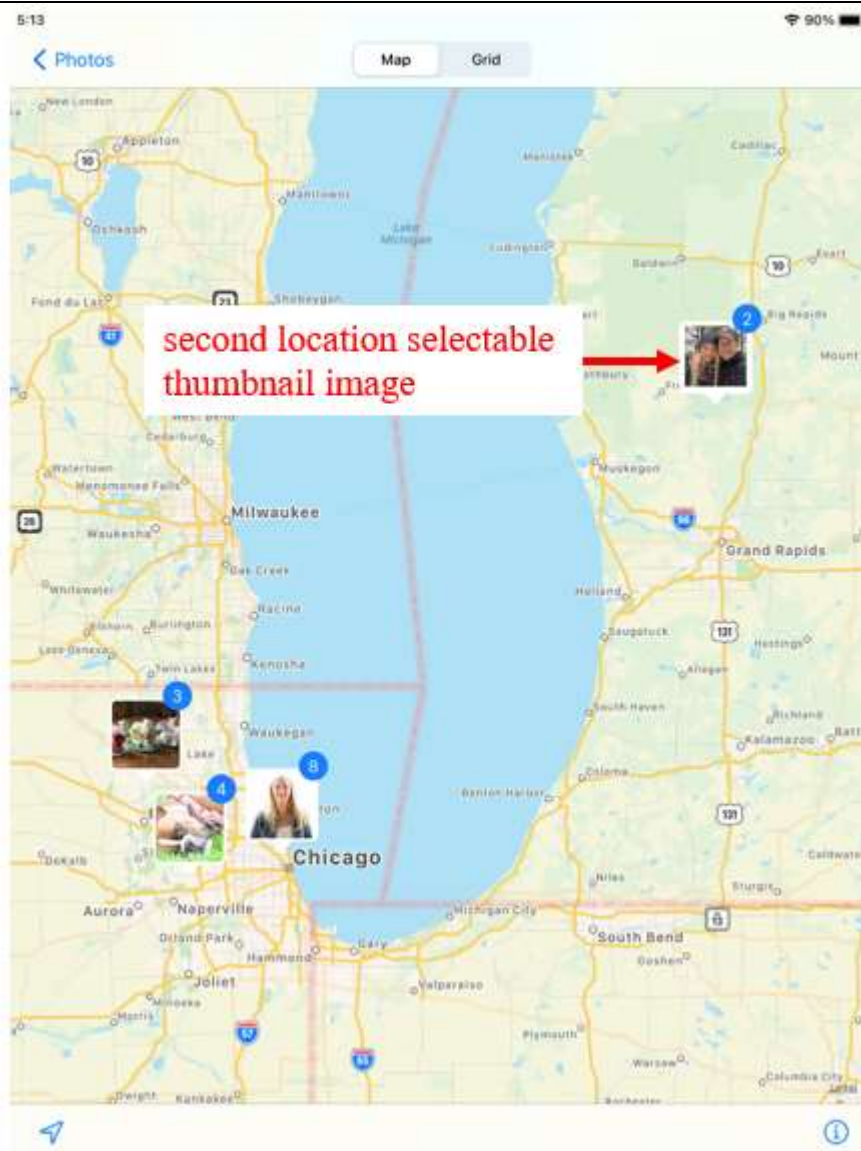
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

	<p>The first location is associated with the geographic coordinates of a first geotag. In this example, the first location selection thumbnail is associated with Chicago. <i>See also</i> information for limitation 1[b][ii][A].</p>
<p><b>1[b][ii][A]</b> a first set of digital photographs and videos including all of the digital photographs and videos associated with the first geotag;</p>	<p>The first location selectable thumbnail image is associated with a first set of digital photographs and videos including all of the digital photographs and videos associated with the first geotag.</p>

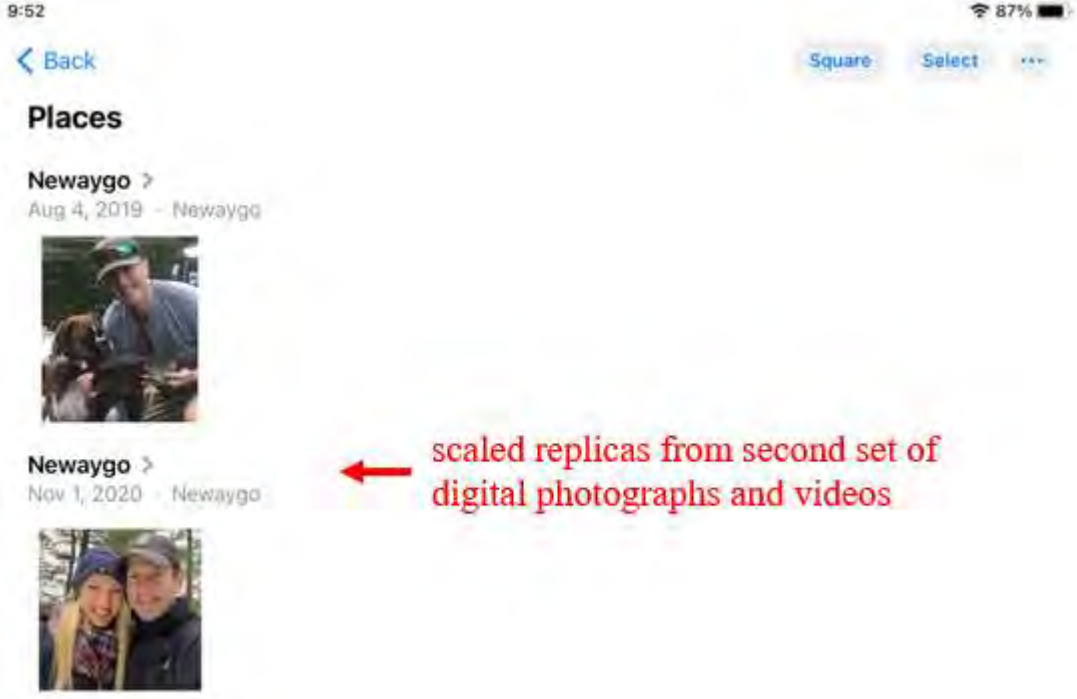





<p><b>1[b][iii]</b> (iii) a first count value image partially overlapping the first location selectable thumbnail image, the first count value image including a first number that corresponds to the number of digital photographs and videos in the first set of digital photographs and videos;</p>	<p>Displaying the map view includes displaying a first count value image partially overlapping the first location selectable thumbnail image. The first count value image including a first number (in this example, 8), which corresponds to the number of digital photographs and videos in the first set of photographs and videos.</p>  <p>The image shows a map with several location markers. A blue circle with the number '3' is positioned over a thumbnail of a plate of food. Another blue circle with the number '4' is over a thumbnail of a pig. A third blue circle with the number '8' is over a thumbnail of a woman's face. Red arrows point from text labels to these elements: 'first number' points to the '8', 'first count value image' points to the blue circle with '8', and 'first location selectable thumbnail image' points to the woman's face thumbnail.</p>
<p><b>1[b][iv]</b> (iv) a second location selectable thumbnail image at a second location on the interactive map, the second location being associated with the geographic coordinates of a second geotag,</p>	<p>Displaying the map view includes displaying a second location selectable thumbnail image at a second location on the interactive map.</p>

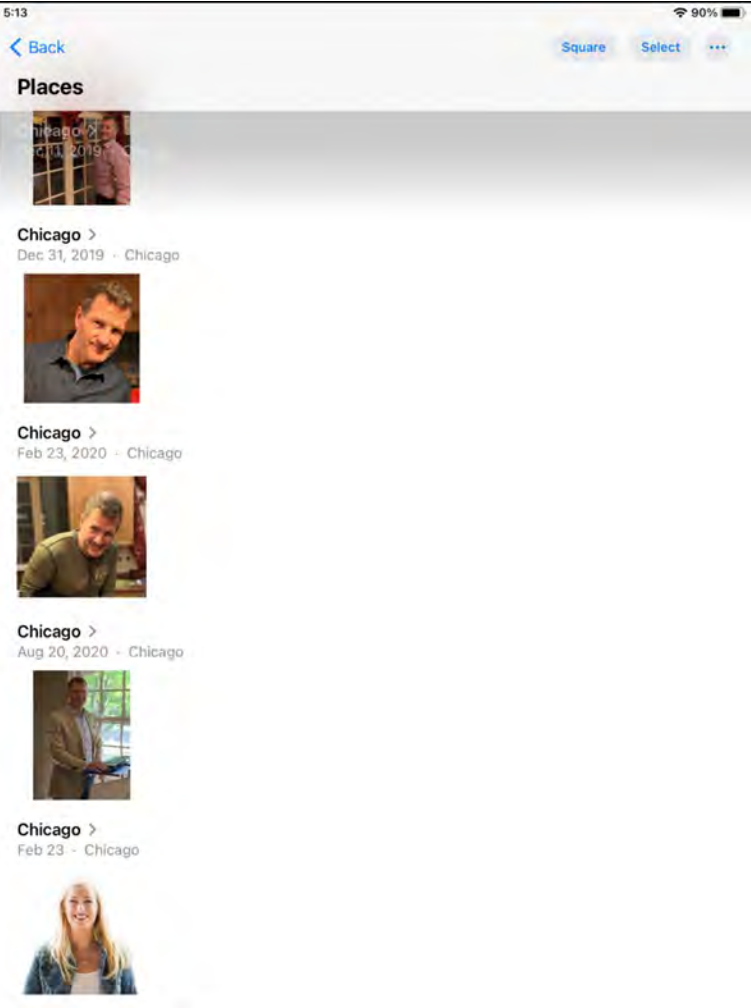



The second location is associated with the geographic coordinates of a second geotag. In this example, the second location selection thumbnail is associated with Newaygo, MI. *See also* information for limitation 1[b][iv][A].

<p><b>1[b][iv][A]</b> a second set of digital photographs and videos including all of the digital photographs and videos associated with the second geotag; and</p>	<p>The second location selectable thumbnail image is associated with a second set of digital photographs and videos including all of the digital photographs and videos associated with the second geotag.</p> 
<p><b>1[b][v]</b> (v) a second count value image partially overlapping the second location selectable thumbnail image, the second count value image including a second</p>	<p>Displaying the map view includes displaying a second count value image partially overlapping the second location selectable thumbnail image. The second count value image includes a second number (in this example, 2), which corresponds to the number of digital photographs and videos in the second set of digital photographs and videos.</p>

<p>number that corresponds to the number of digital photographs and videos in the second set of digital photographs and videos;</p>	
<p><b>1[c]</b> responsive to a click or tap of the first location selectable thumbnail image, displaying a first location view on the video display device, the displaying the first location view including displaying</p>	<p>Responsive to a click of the first location selectable thumbnail image, iPadOS displays a first location view on the video display device.</p>

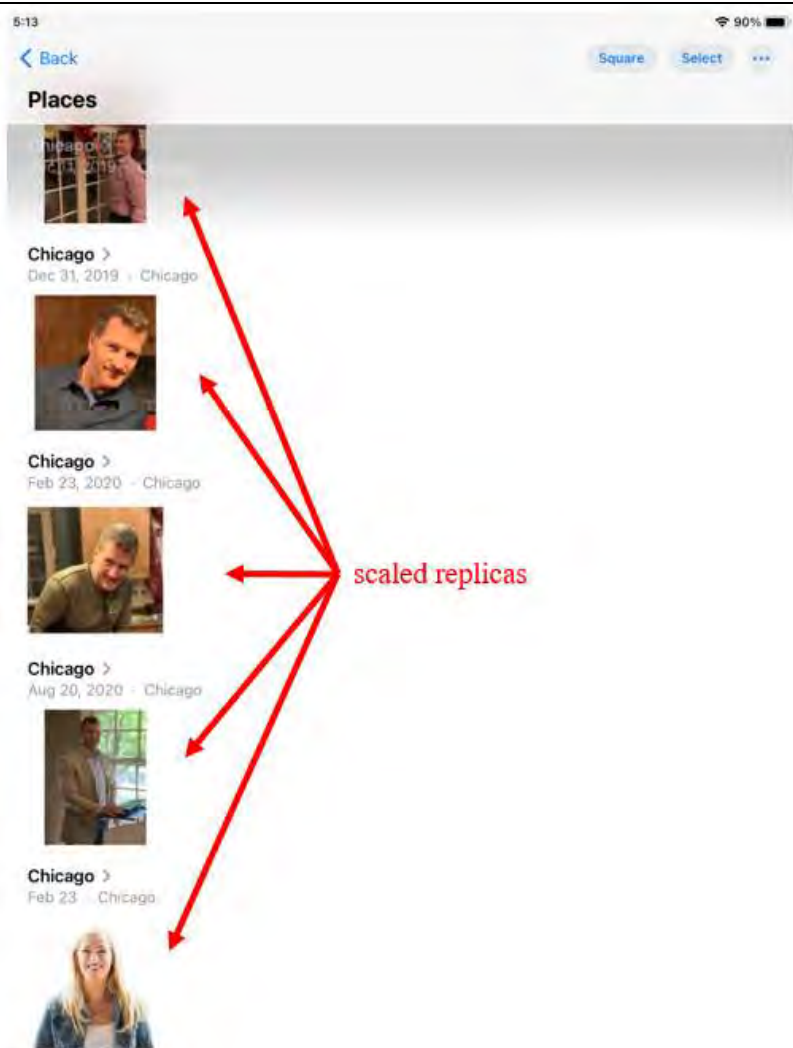
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

	 <p>The screenshot shows an iPadOS interface with a 'Places' section. It lists several geotags for 'Chicago'. The first entry is 'Chicago' with a date of 'Dec 31, 2019' and a photo of a man. The second entry is 'Chicago' with a date of 'Feb 23, 2020' and a photo of a man. The third entry is 'Chicago' with a date of 'Aug 20, 2020' and a photo of a man. The fourth entry is 'Chicago' with a date of 'Feb 23' and a photo of a woman.</p>
<p><b>1[c][i]</b> (i) a first location name associated with the first geotag and</p>	<p>The first location view includes a first location name (in this example, Chicago) associated with the first geotag.</p>

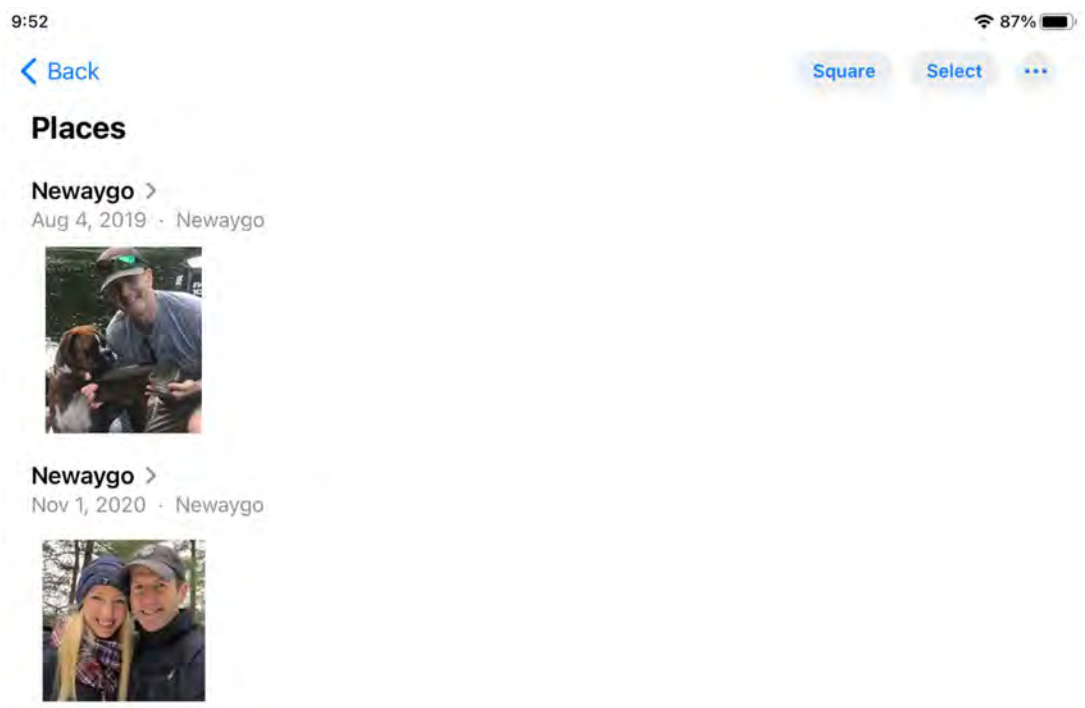
	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button, 'Square' and 'Select' options, and a battery indicator at 90%. Below the title 'Places', there is a horizontal scroll bar. A list of photos is displayed, each with a 'Chicago' location tag. The tags are highlighted with red boxes. A red arrow points to the first 'Chicago' tag with the text 'first location name'.</p>
<p><b>1[c][iii]</b> ii) a scaled replica of each of the digital photographs and videos in the first set of digital</p>	<p>The first location view includes a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos.</p>




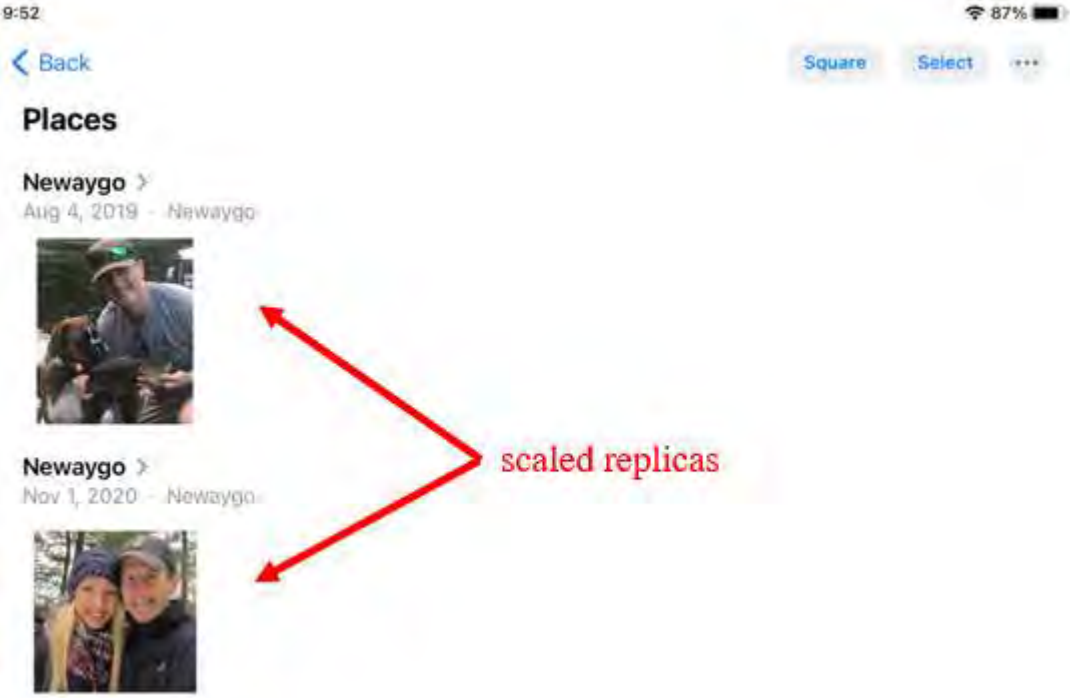
photographs and videos, the displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos not being overlaid on the interactive map; and



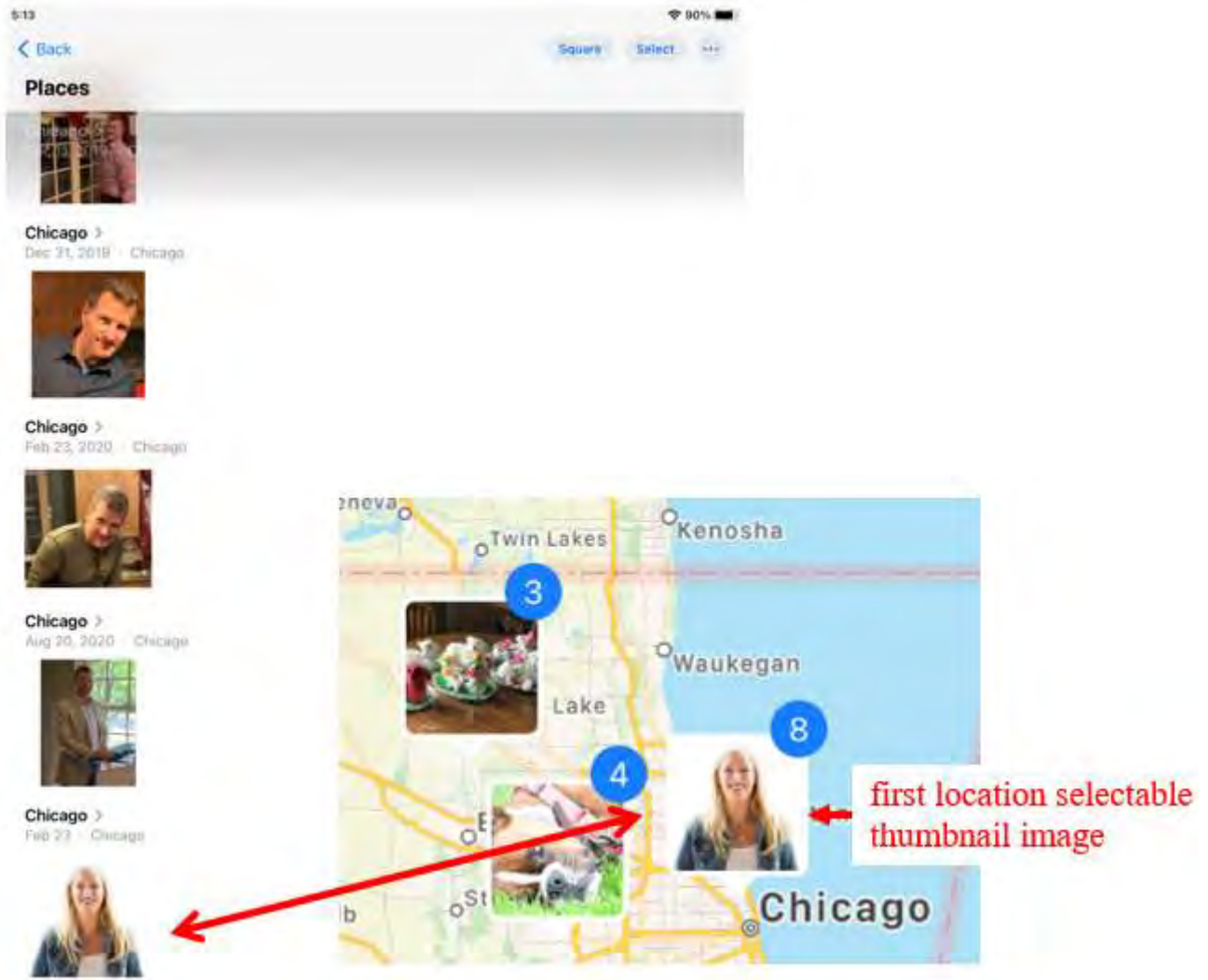
*See also* information for limitation 3[a]. As shown above, the displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos are not overlaid on the interactive map. *See* information for limitation 1[b][i].

<p><b>1[d]</b> responsive to a click or tap of the second location selectable thumbnail image, displaying a second location view on the video display device, the displaying the second location view including displaying</p>	<p>Responsive to a click or tap of the second location selectable thumbnail image, iPadOS displays a second location view on the video display device (e.g., Apple iPad).</p> 
<p><b>1[d][i]</b> (i) a second location name corresponding to the second geotag and</p>	<p>The second location view includes a second location name (in this example, Newygo) corresponding to the second geotag.</p>

	
<p><b>1[d][ii]</b> (ii) a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos.</p>	<p>The second location view also includes a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos.</p>

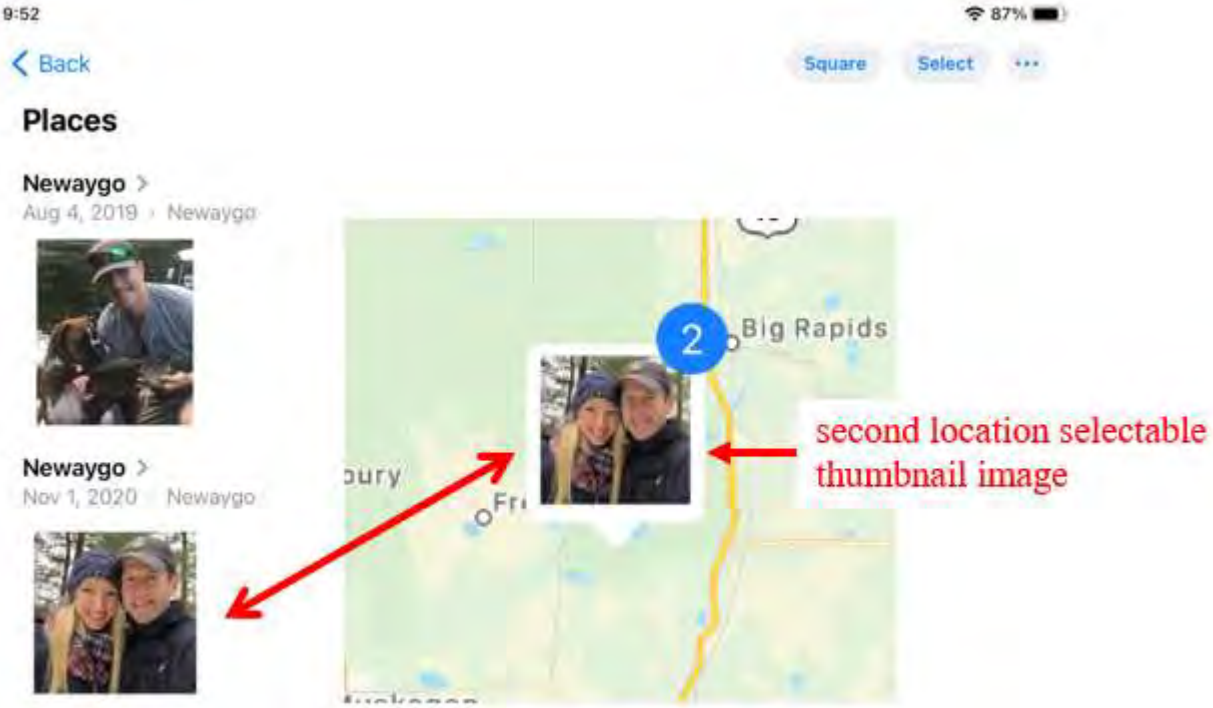
<p>second set of digital photographs and videos not being overlaid on the interactive map.</p>	 <p>As shown above, the displayed scaled replicas of each of the digital photographs and videos in the second set of digital photographs and videos are not overlaid on the interactive map. <i>See</i> information for limitation 1[b][i].</p>
<p><b>2[pre]</b> The computer-implemented method of claim 1, wherein</p>	<p><i>See</i> information for claim 1.</p>
<p><b>2[a]</b> the first location selectable thumbnail image includes a scaled</p>	<p>As shown below, the first location selectable thumbnail image (<i>see</i> limitation 1[b][ii]) includes a scaled representation of at least one of the digital photographs in the first set of digital photographs (<i>see</i> limitation 1[b][ii][A]).</p>

representation of at least one of the digital photographs in the first set of digital photographs, and

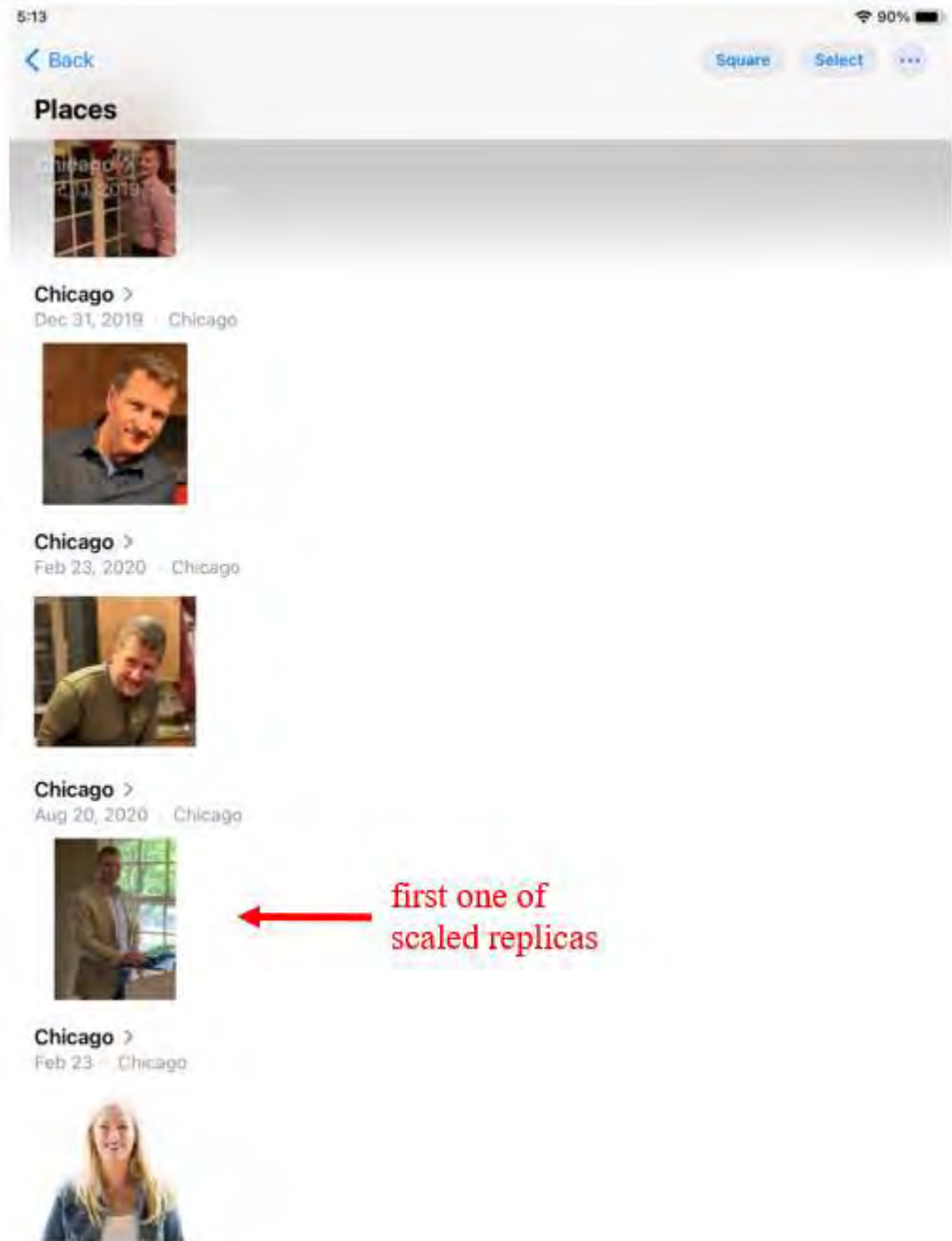


**2[b]** and wherein the second location selectable thumbnail image includes a scaled

The second location selectable thumbnail image (*see* limitation 1[b][iv]) includes a scaled representation of at least one of the digital photographs in the second set of digital photographs (*see* limitation 1[b][iv][A]).

<p>representation of at least one of the digital photographs in the second set of digital photographs.</p>	
<p><b>3[pre]</b> The computer-implemented method of claim 1, further comprising</p>	<p>See information for claim 1.</p>
<p><b>3[a]</b> responsive to a click or tap of a first one of the displayed scaled replicas in the first location view, displaying a first digital photograph associated with the</p>	<p>Responsive to clicking one of the scaled replicas in the first location view (see limitation 1[c][ii]), iPadOS displays a first digital photograph associated with the first scaled replica.</p>

first scaled replica  
in the first location  
view and



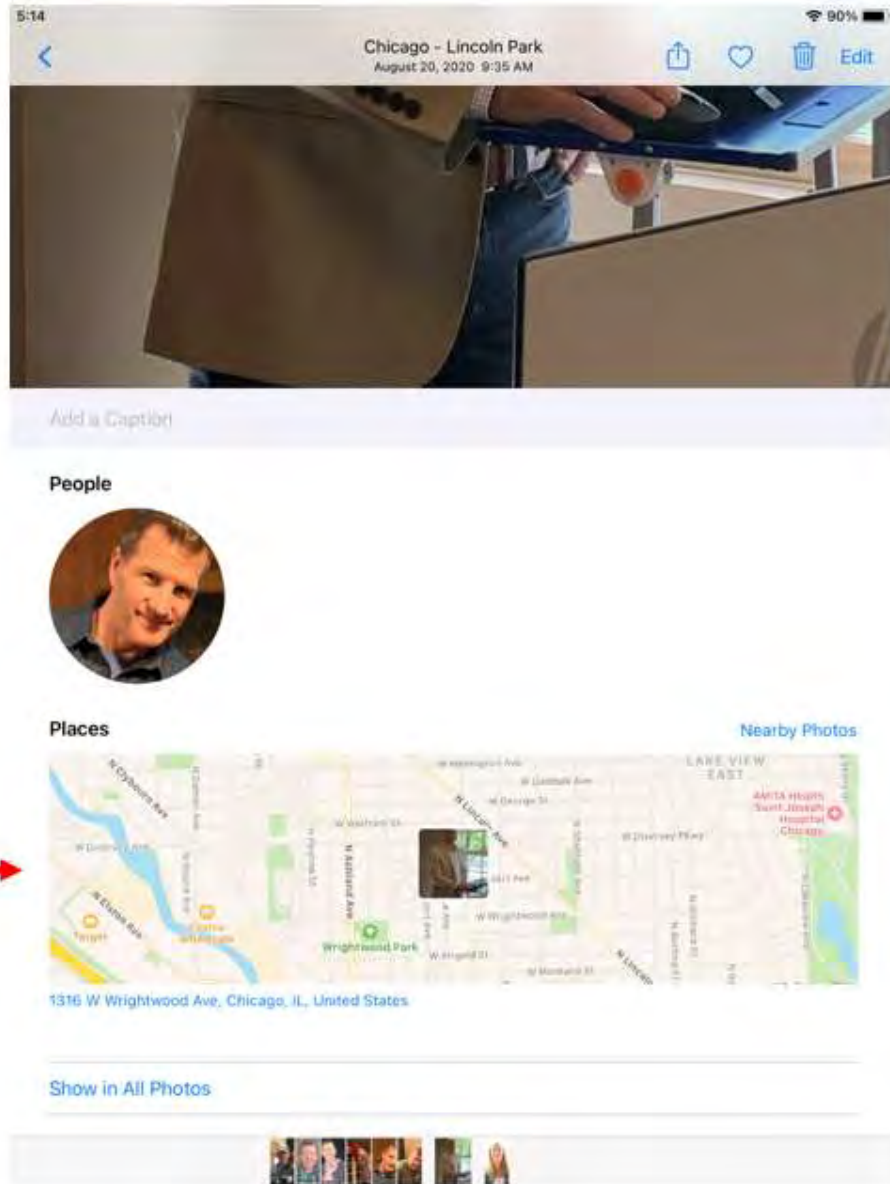





Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

<p><b>3[b]</b> a first map image indicating the geographic coordinates of the first geotag.</p>	<p>iPadOS also displays a first map image indicating the geographic coordinates of the first geotag below the first digital photograph, as shown below:</p>
---	---

Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS



first map image →

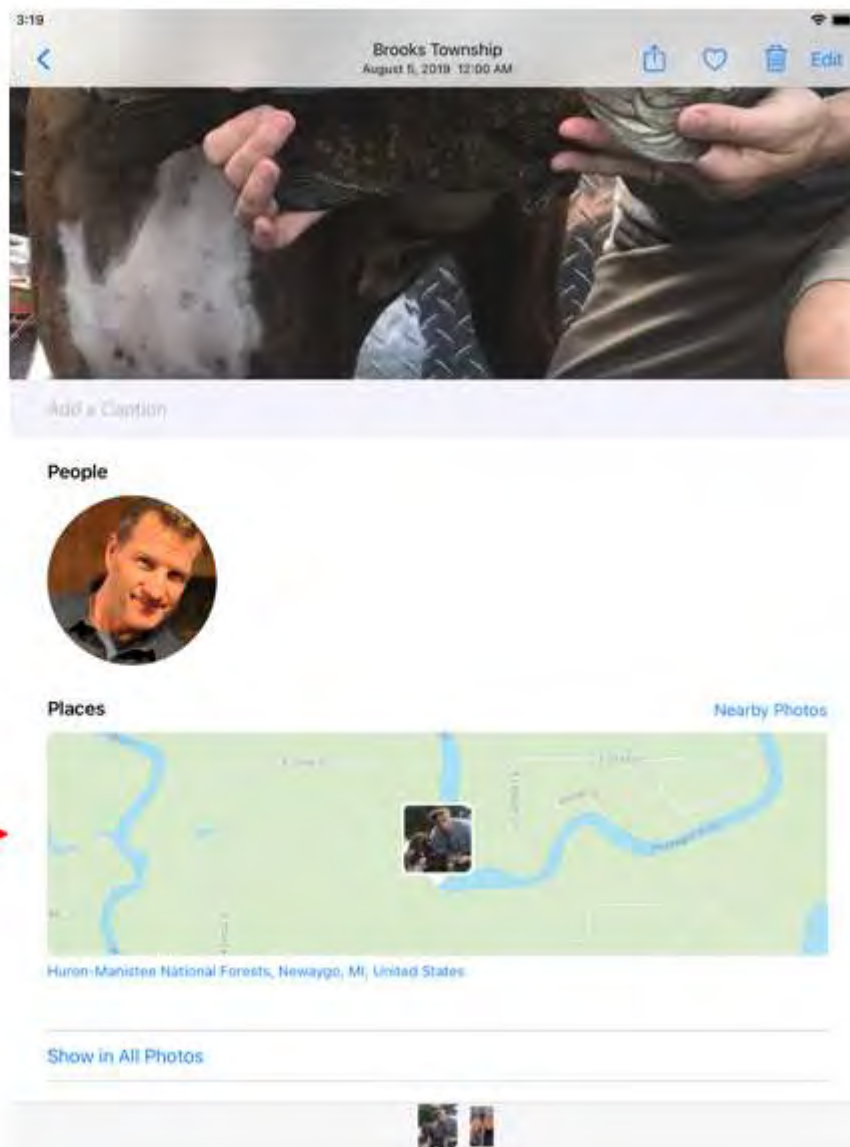
<p><b>4[pre]</b> The computer-implemented method of claim 3, further comprising</p>	<p>See information for claim 1.</p>
<p><b>4[a]</b> responsive to a click or tap of a first one of the displayed scaled replicas in the second location view, displaying a first digital photograph associated with the first scaled replica in the second location view and</p>	<p>Responsive to clicking one of the scaled replicas in the second location view, iPadOS displays a second digital photograph associated with the second scaled replica is displayed.</p> 



4[b] a second map image indicating the geographic

iPadOS also displays a second map image indicating the geographic coordinates of the second geotag below first digital photograph, as shown below.

coordinates of the second geotag.



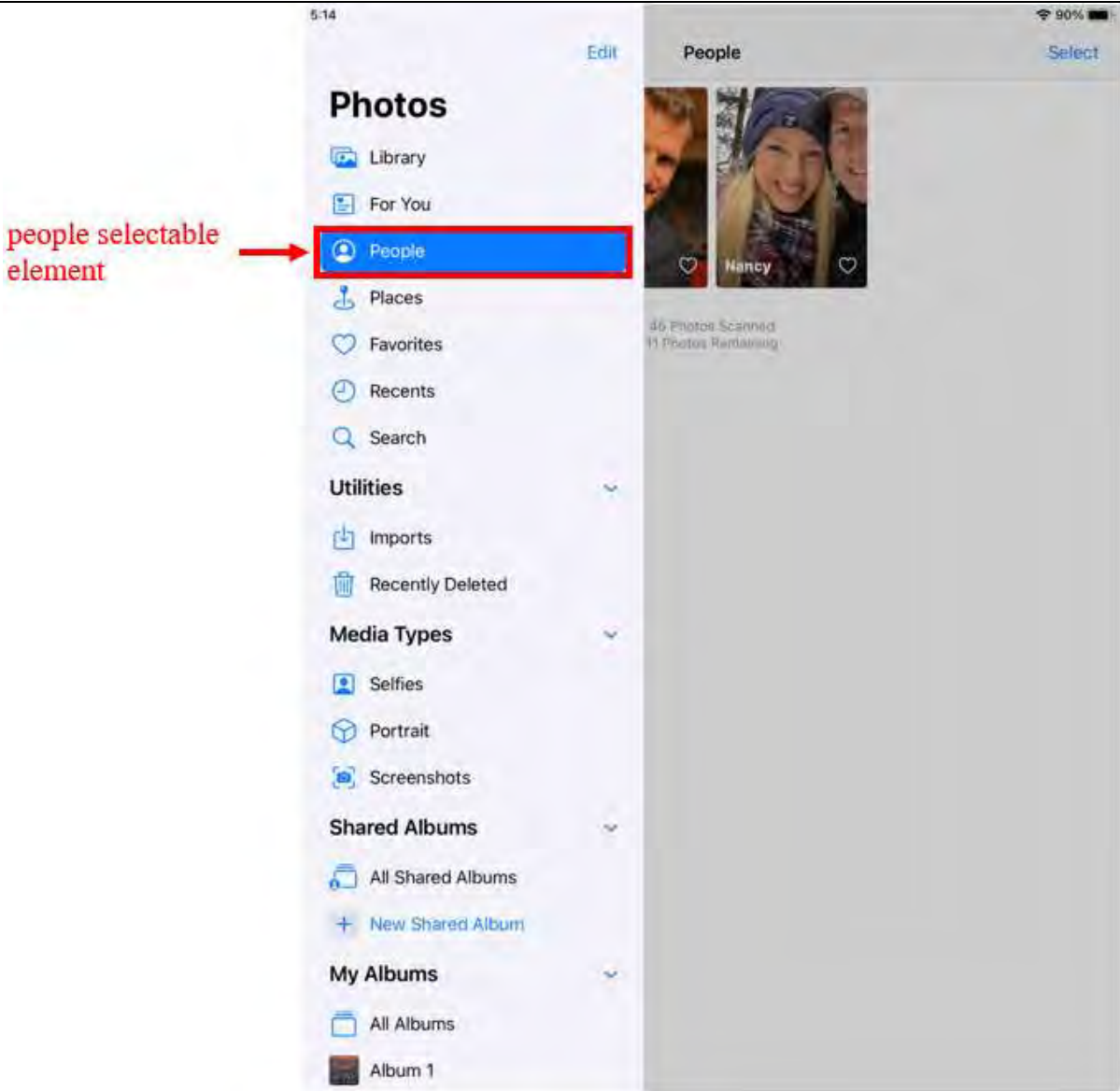
second map image →



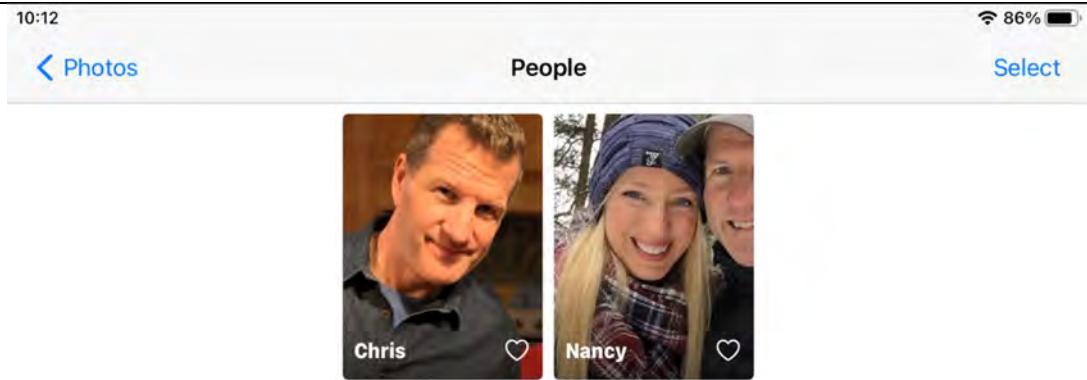
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

<b>5[pre]</b> The computer-implemented method of claim 1,	<i>See</i> information for claim 1.
<b>5[a]</b> wherein the plurality of selectable elements further includes a people selectable element,	The plurality of selectable elements in the application view ( <i>see</i> limitation 1[a]) includes a people selectable element, as shown below.



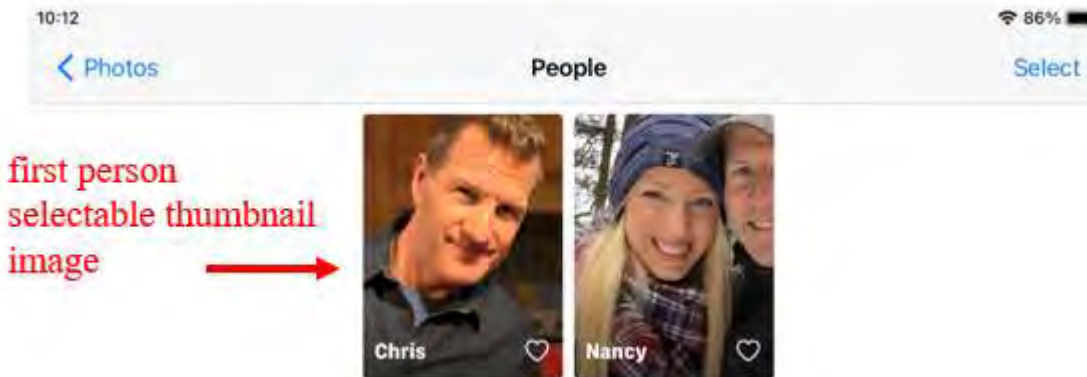
	 <p>The screenshot shows the iPadOS Photos app interface. On the left, a sidebar menu lists various photo categories: Photos, Library, For You, People (highlighted in blue), Places, Favorites, Recents, Search, Utilities, Media Types, Shared Albums, and My Albums. A red arrow points to the 'People' item, which is labeled 'people selectable element' in red text. On the right, the 'People' view is displayed, showing a grid of photo thumbnails, including one labeled 'Nancy'. The top of the screen shows the time '5:14' and battery level '90%'.</p>
<p>5[b] the method further comprising</p>	<p>iPadOS displays a people view responsive to a tap of the people selectable element.</p>

responsive to a click or tap of the people selectable element, displaying a people view, the displaying the people view including displaying:

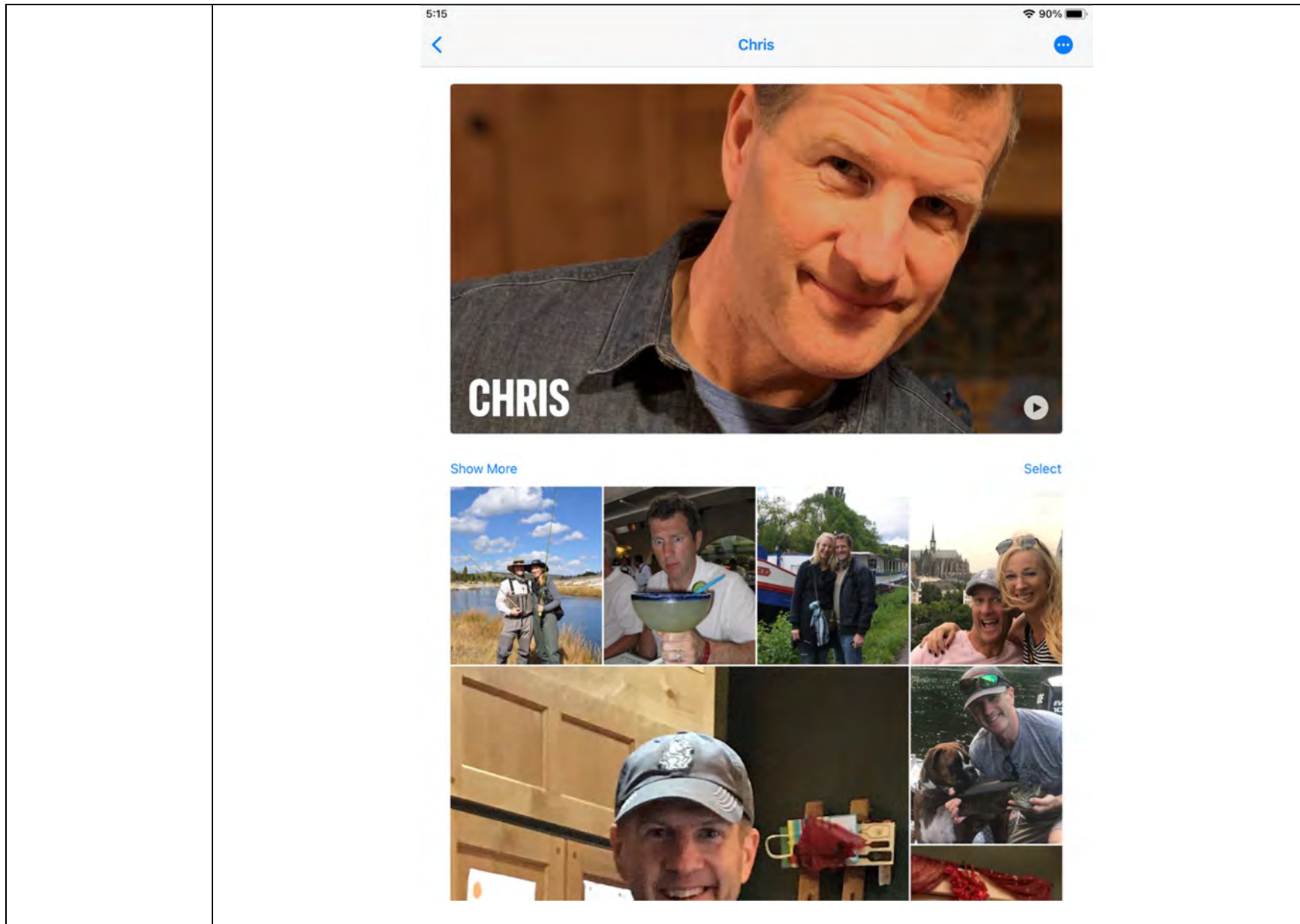


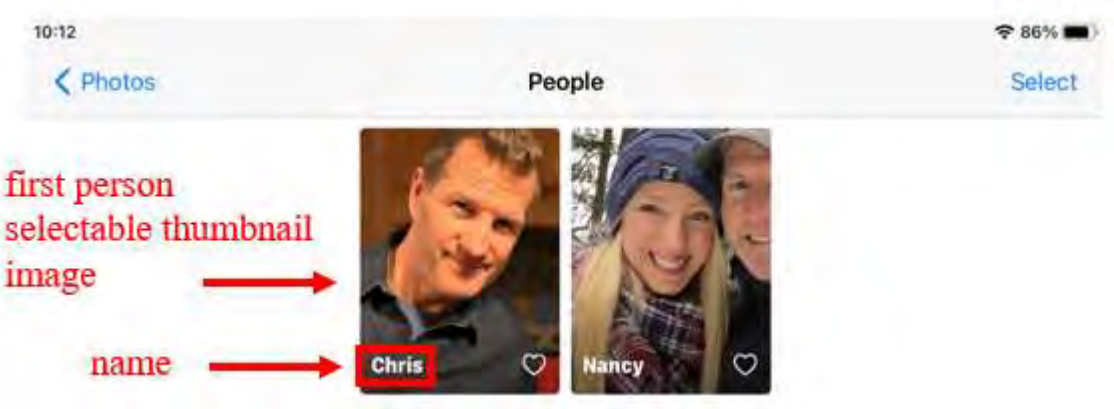
5[c] (i) a first person selectable thumbnail image including an image of a face of a first person, a third set of digital photographs and videos including digital photographs and videos associated with the first person;

The people view includes a first person selectable thumbnail image including an image of a face of a first person:

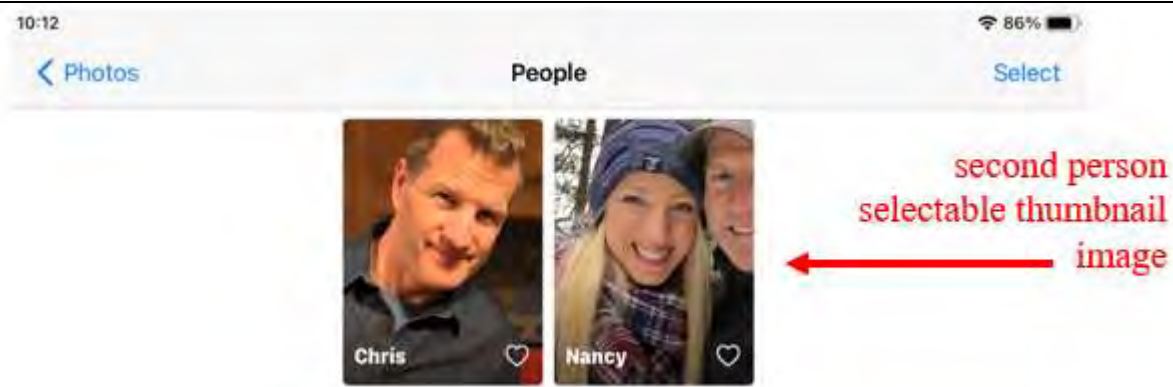


As shown, the first person selectable thumbnail image is associated with a third set of digital photographs and videos:




<p><b>5[d]</b> (ii) a name associated with the first person, the name associated with the first person being displayed adjacent to the first person selectable thumbnail image;</p>	<p>A name associated with the first person is displayed adjacent to the first person selectable thumbnail image, as shown below:</p>  <p>To the extent it is found that the name associated with the first person is not literally displayed adjacent to the first person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the name associated with the first person is to communicate the name of the first person that is associated with the first person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the name associated with the first person in sufficient proximity to the first person selectable thumbnail image such that a user will associate the name associated with the first person with the first person selectable thumbnail image. The result of the claimed displaying is that the name associated with the first person is associated with the first person selectable thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>5[e]</b> (iii) a second person selectable thumbnail image including an image of a face of a second person, a fourth set of digital</p>	<p>The people view includes a second person selectable thumbnail image including an image of a face of a second person:</p>

photographs and videos including digital photographs and videos associated with the second person; and

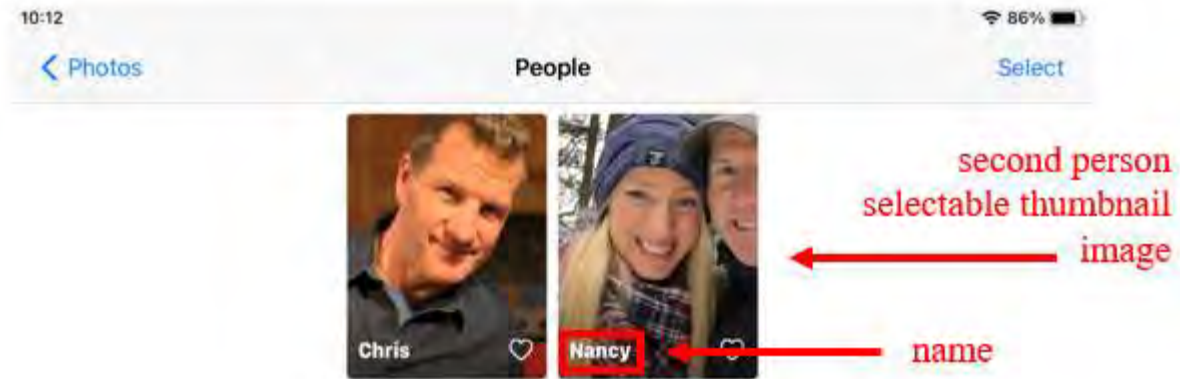


As shown, the second person selectable thumbnail image is associated with a fourth set of digital photographs and videos:



	 <p>The screenshot shows an iPadOS photo gallery interface. At the top, the status bar displays the time as 5:15, a signal strength indicator, and a battery level of 90%. Below the status bar, a navigation bar shows a back arrow on the left, the name 'Nancy' in the center, and a three-dot menu icon on the right. The main content area displays a large photo of two people fishing in a river. Below this photo is a row of five smaller thumbnail images. The second thumbnail from the left is highlighted with a white border and has the name 'Nancy' displayed in blue text to its right. A 'Select' button is visible in the top right corner of the photo gallery view.</p>
<p><b>5[f]</b> (iv) a name associated with the</p>	<p>A name associated with the second person is displayed adjacent to the second person selectable thumbnail image, as shown below:</p>

second person, the name associated with the second person being displayed adjacent to the second person selectable thumbnail image.



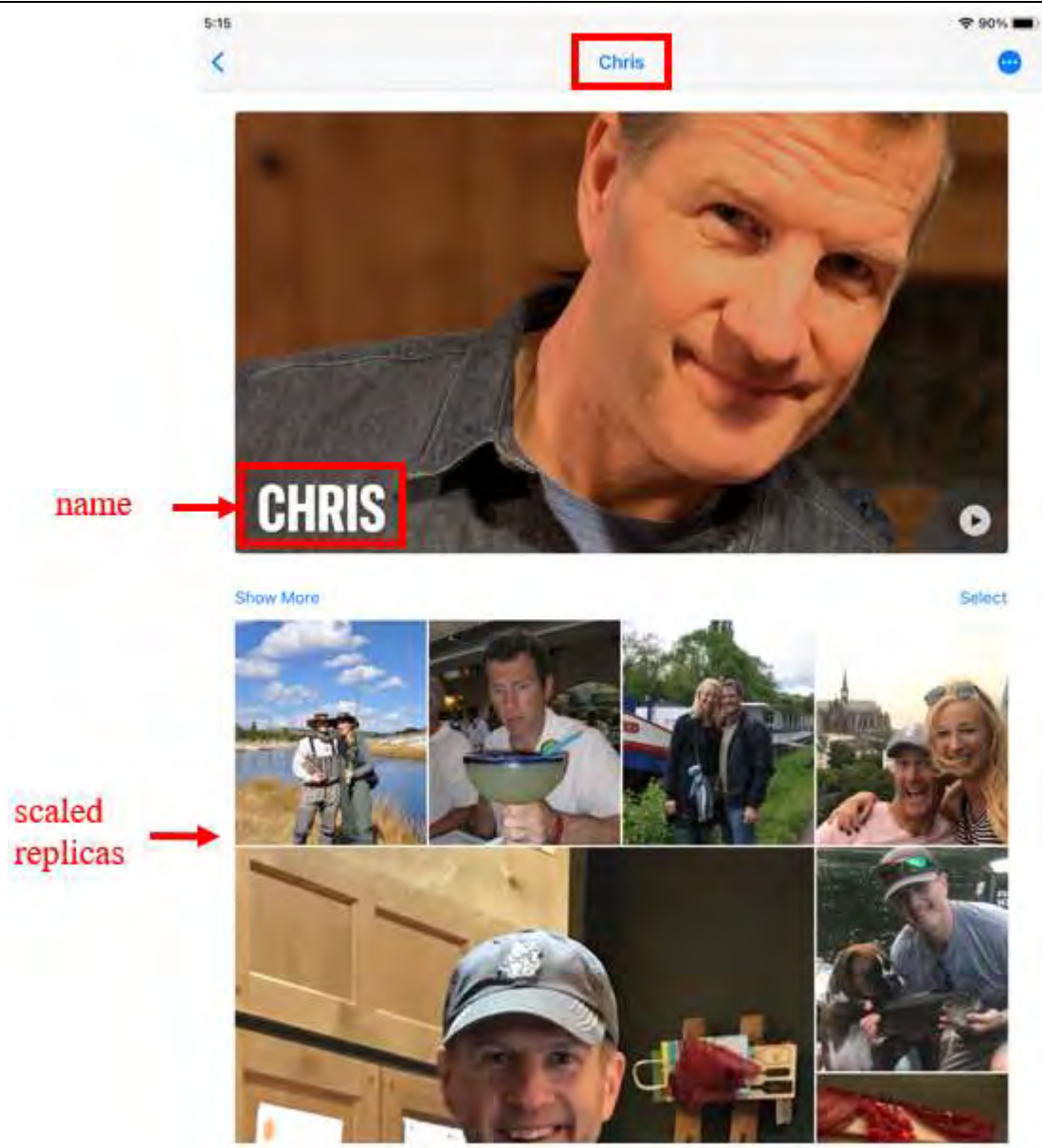
To the extent it is found that the name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the name associated with the second person is to communicate the name of the second person that is associated with the second person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the name associated with the second person in sufficient proximity to the second person selectable thumbnail image such that a user will associate the name associated with the second person with the second person selectable thumbnail image. The result of the claimed displaying is that the name associated with the second person is associated with the second person selectable thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

7. The computer-implemented method of claim 5, further comprising responsive to a click or tap of the first person selectable thumbnail image, displaying a first

iPadOS displays a first person view responsive to a click or tap of the first person selectable thumbnail image. As shown, the first person view includes the name associated with the first person and scaled replicas of the photos and videos in the third set of digital photographs.

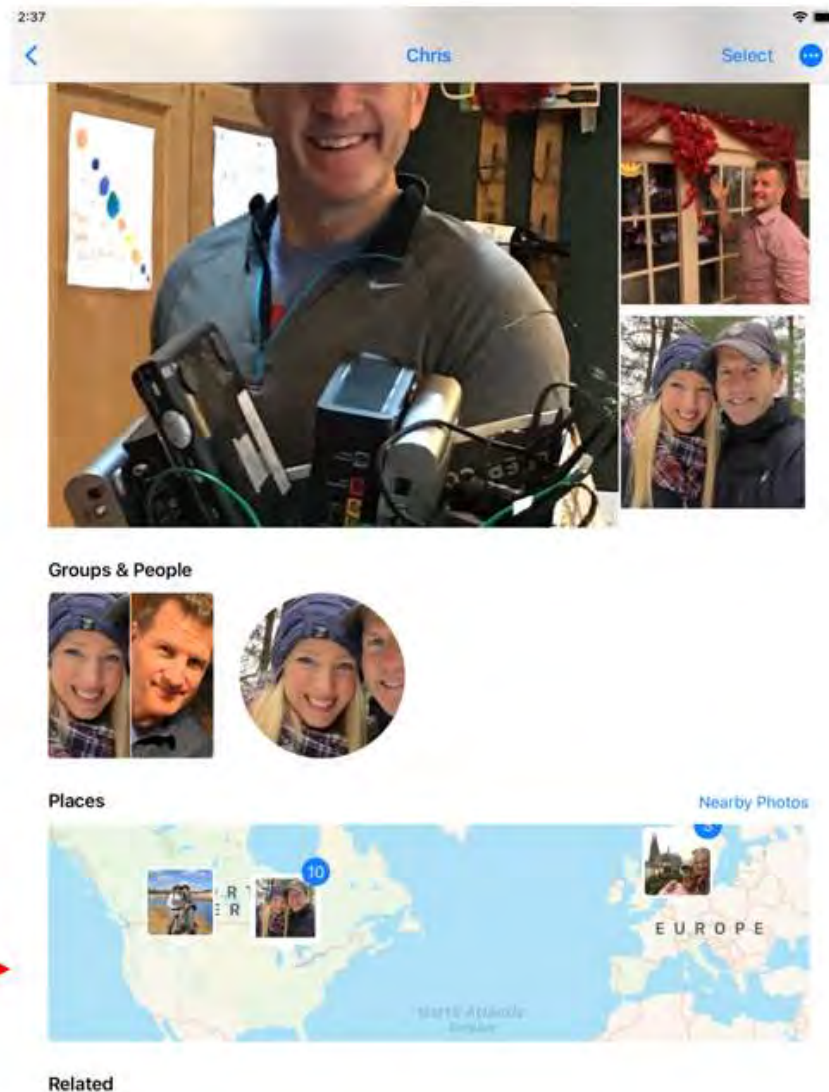


person view, the displaying the first person view including displaying (i) the name associated with the first person and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs.



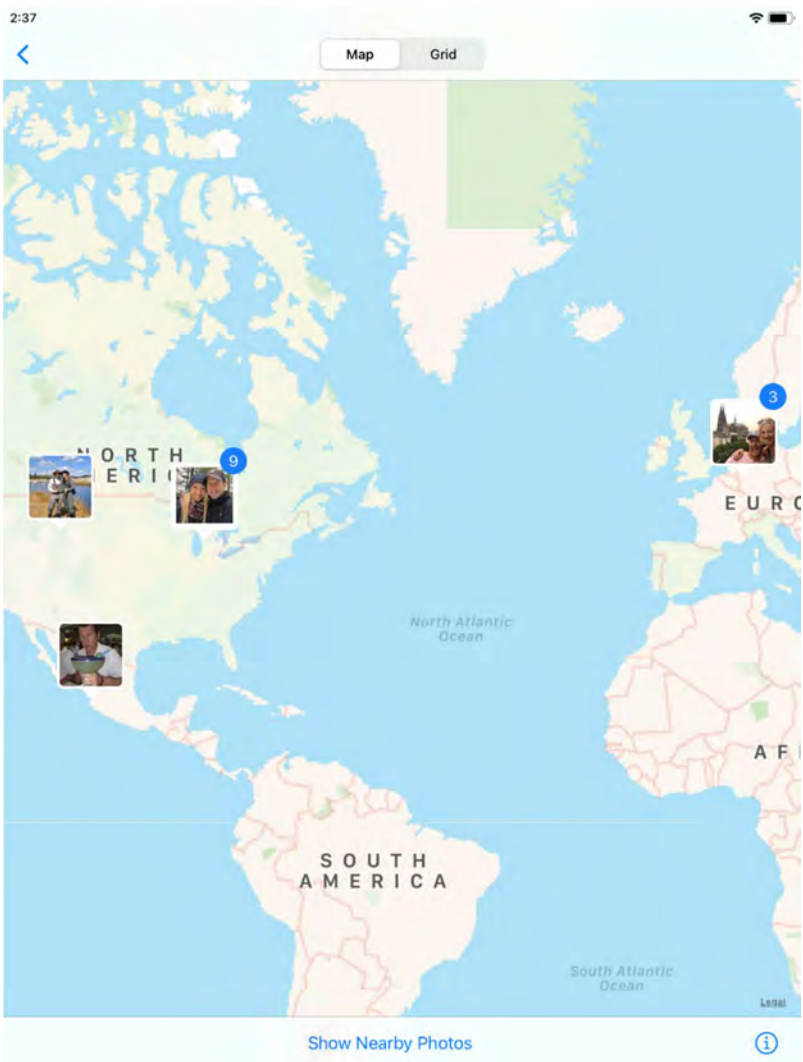
8. The computer-implemented method of claim 7, wherein the displaying the first person view further includes displaying a first-person-location selectable element.

As shown below, the first person view includes a first-person-location selectable element below the scaled replicas.



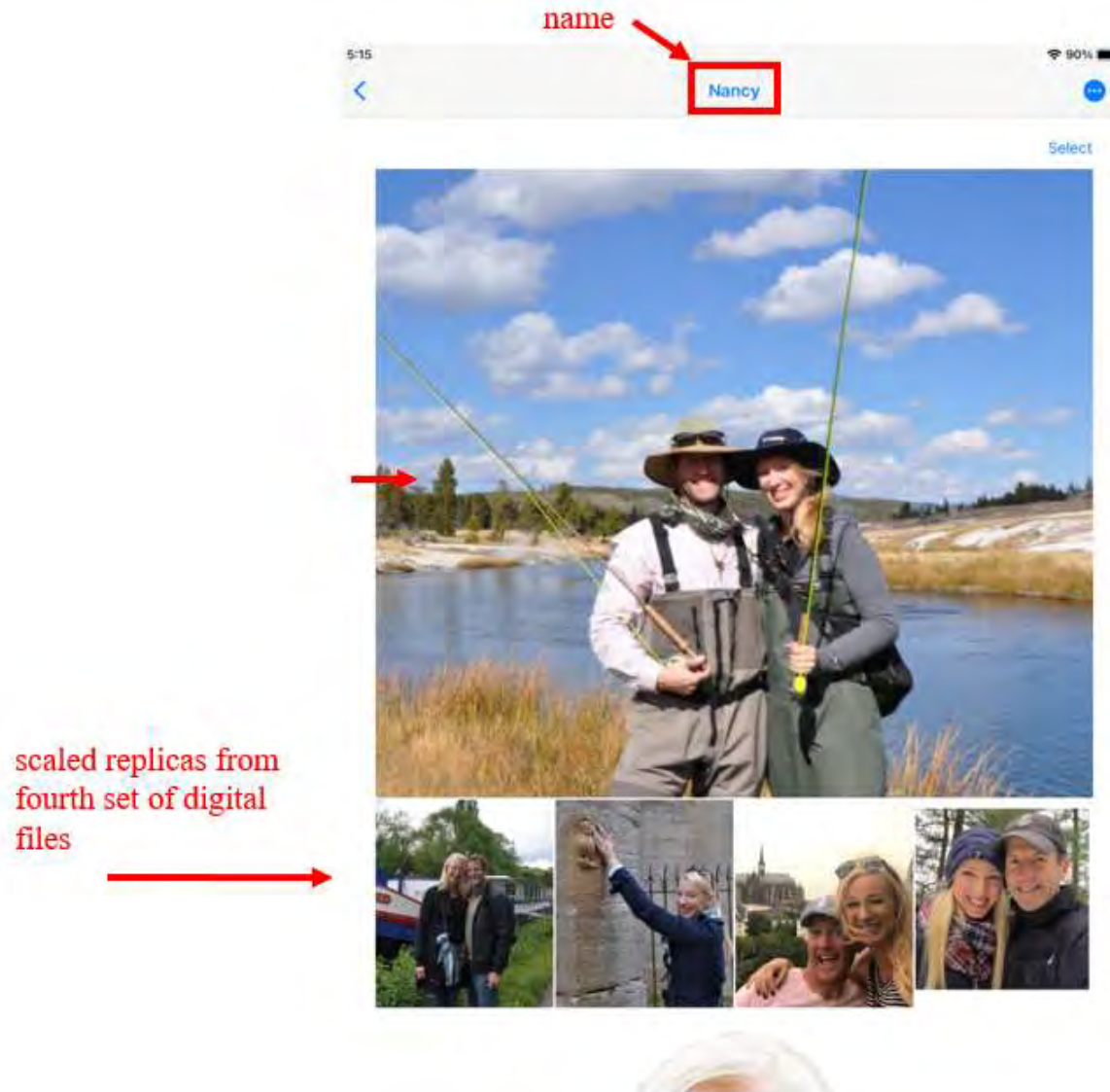
first-person-location  
selectable element



<p><b>9.</b> The computer-implemented method of claim 8, further comprising responsive to a click or tap of the first-person-location selectable element, displaying a representation of all locations having a digital photograph or video associated with the first person.</p>	<p>Responsive to a tap of the first-person-location selectable element, iPadOS displays a representation of locations having a digital photograph or video associated with the first person, as shown below.</p> 

**10.** The computer-implemented method of claim 7, further comprising responsive to a click or tap of the second person selectable thumbnail image, displaying a second person view, the displaying the second person view including displaying (i) the name associated with the second person and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs.

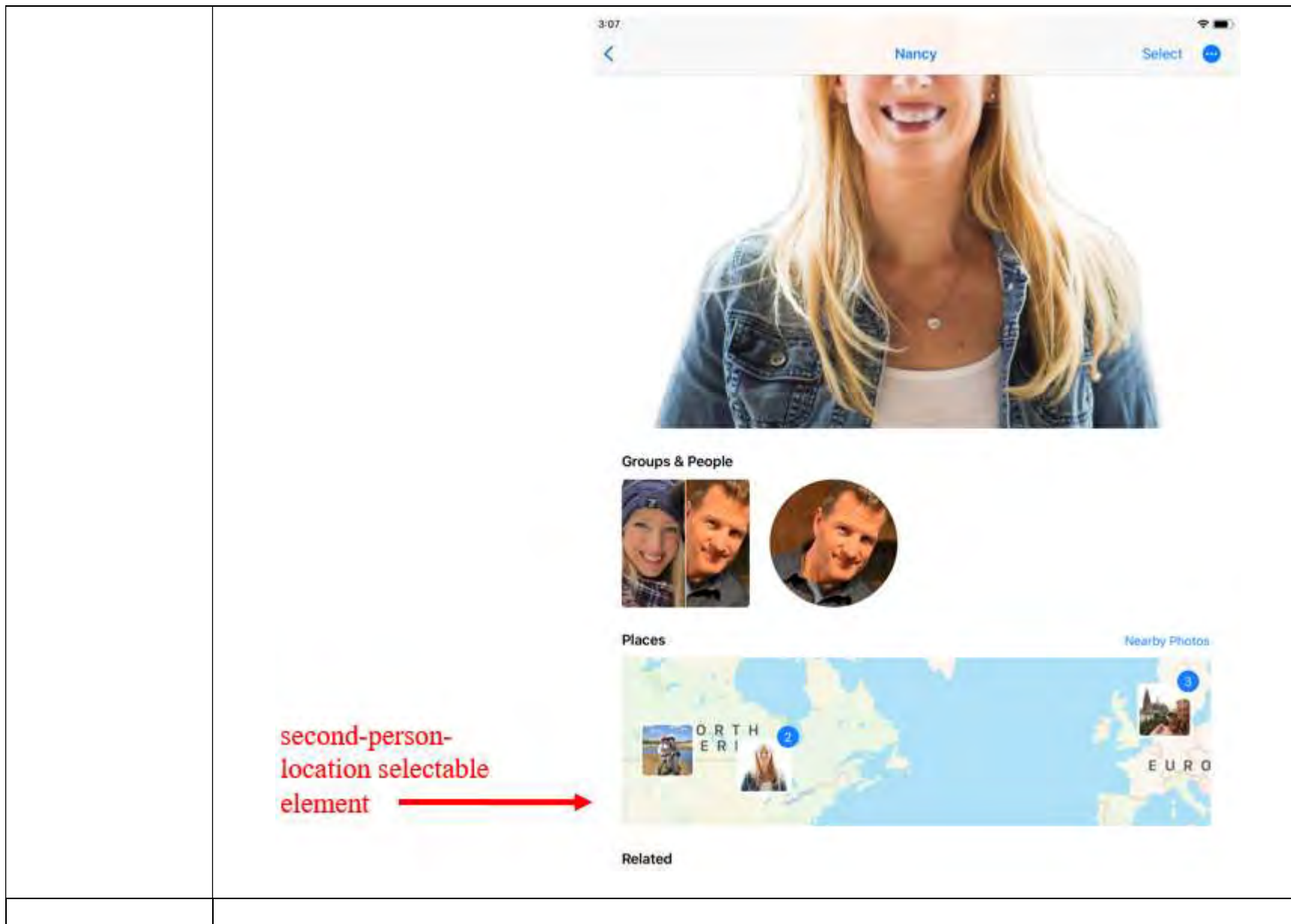
iPadOS displays a second person view responsive to a click or tap of the second person selectable thumbnail image. As shown, the second person view includes the name associated with the second person and a scaled replica of the photos and videos in the fourth set of digital photographs.



Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

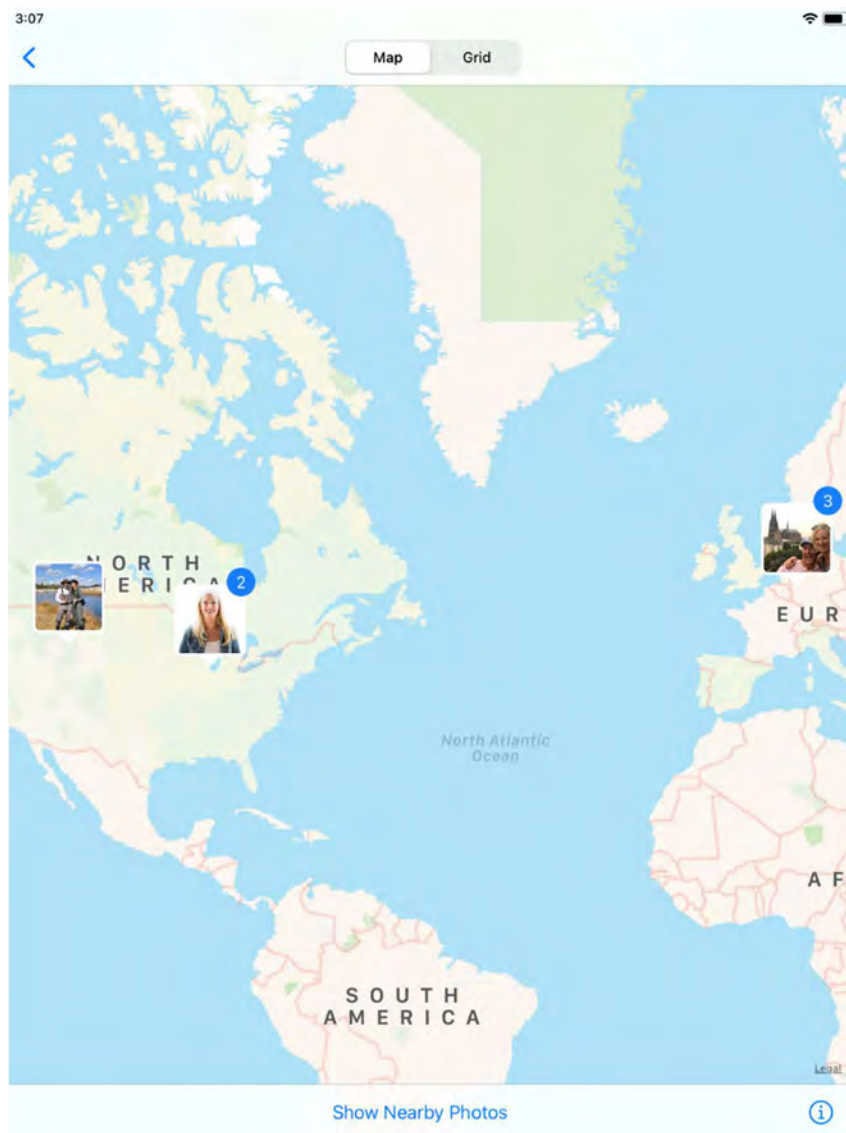
<b>11.</b> The computer-implemented method of claim 10, wherein the displaying the second person view further includes displaying a second-person-location selectable element.	As shown below, the second person view includes a second-person-location selectable element below the scaled replicas.





**12.** The computer-implemented method of claim 11, further comprising responsive to a click or tap of the second-person-location selectable element, displaying a representation of all locations having a digital photograph or video associated with the second person.

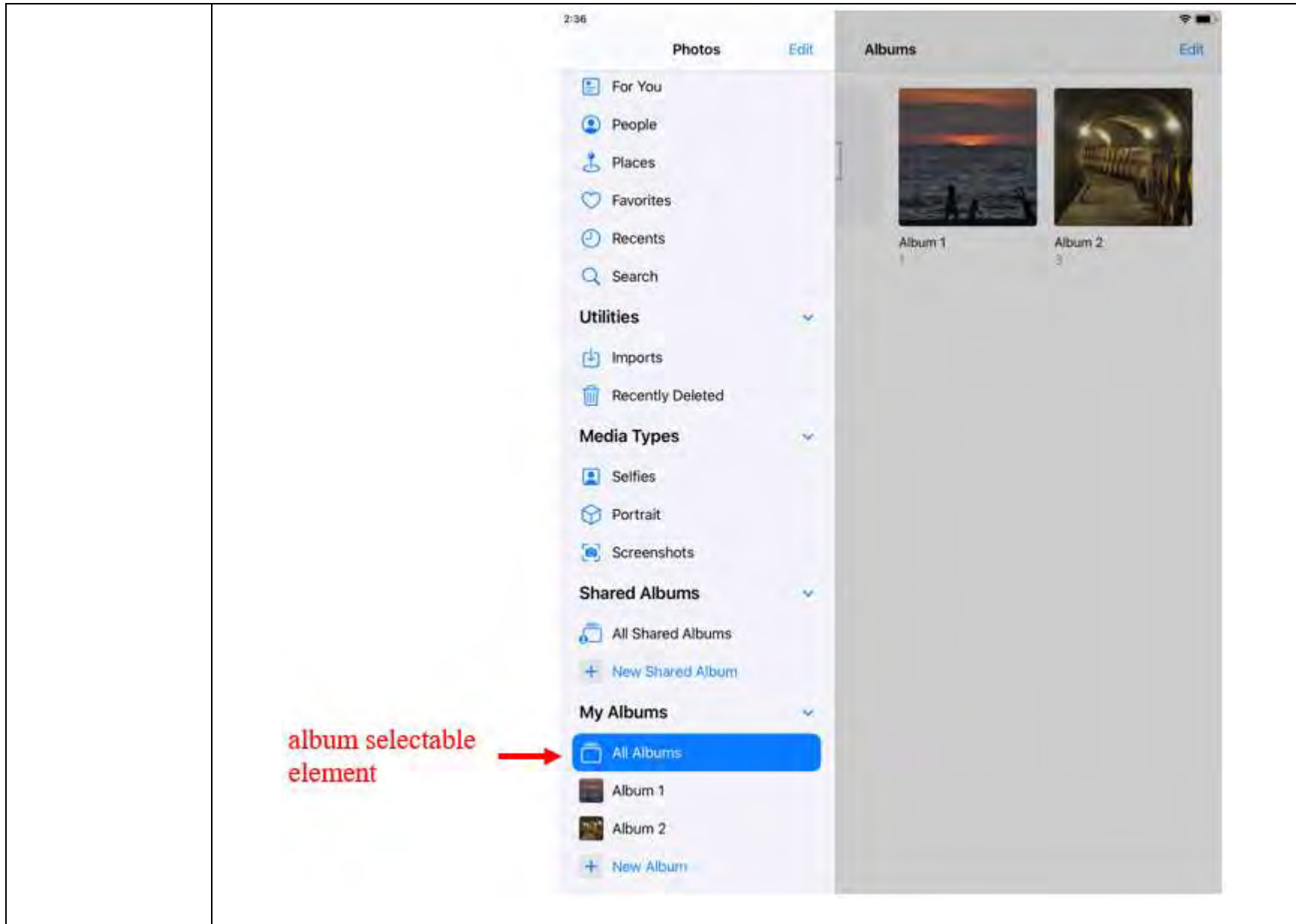
Responsive to a click or tap of the second-person-location selectable element, iPadOS displays a representation of locations having a digital photograph or video associated with the second person.





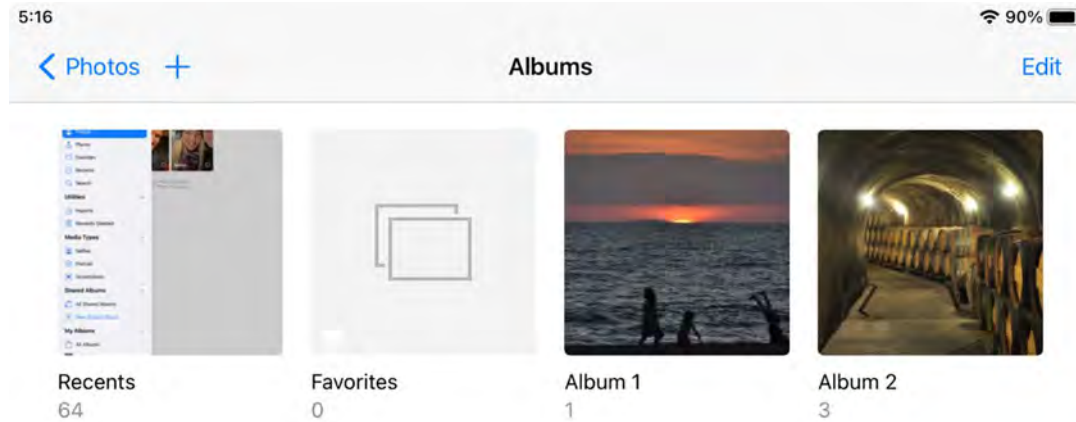
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

<p><b>13[pre]</b> The computer-implemented method of claim 1,</p>	<p><i>See</i> information for claim 1.</p>
<p><b>13[a]</b> wherein the plurality of selectable elements further includes an album selectable element,</p>	<p>The plurality of selectable elements (<i>see</i> limitation 1[a]) further includes an album selectable element.</p>



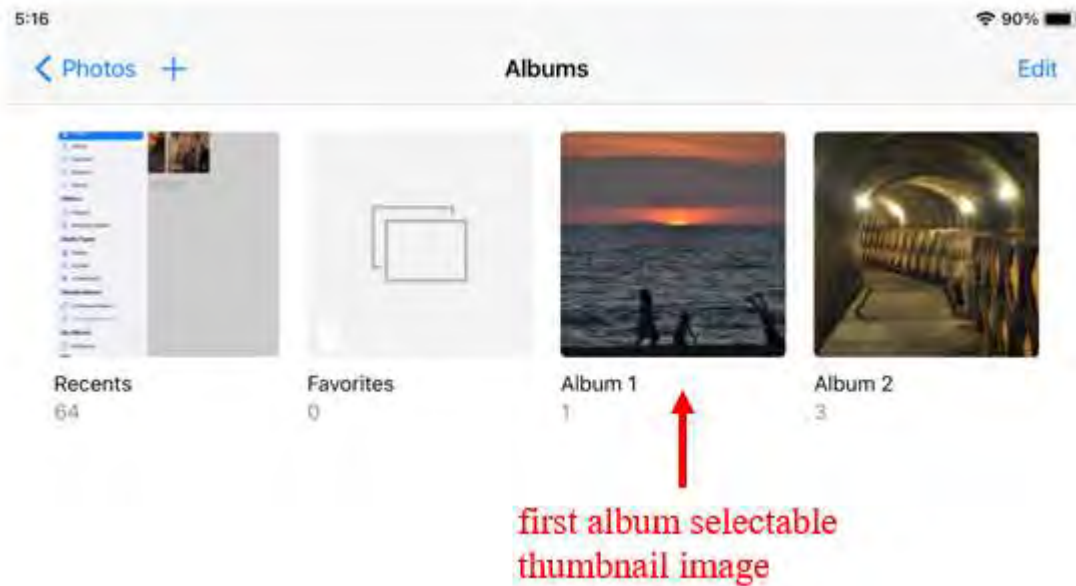
**13[b]** the method further comprising responsive to a click or tap of the album selectable element, displaying an album view, the displaying the album view including displaying:

iPadOS displays an album view responsive to a click or tap of the album selectable element.



**13[c][i]** (i) a first album selectable thumbnail image including a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag;

The album view includes a first album selectable thumbnail image.

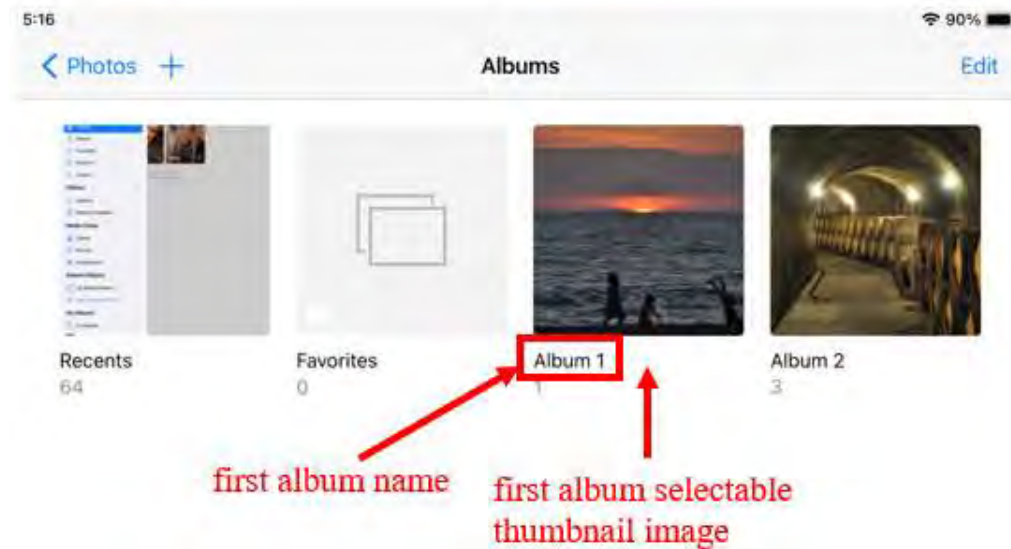


The first album selectable thumbnail includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag.



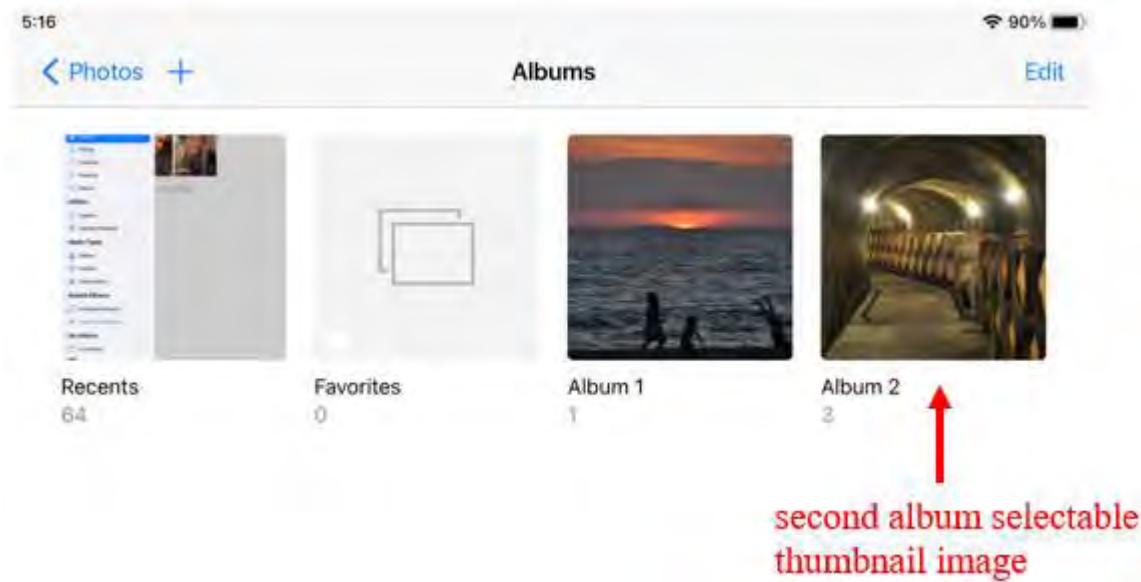
**13[c][ii]** (ii) a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image;

The album view also includes a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image.

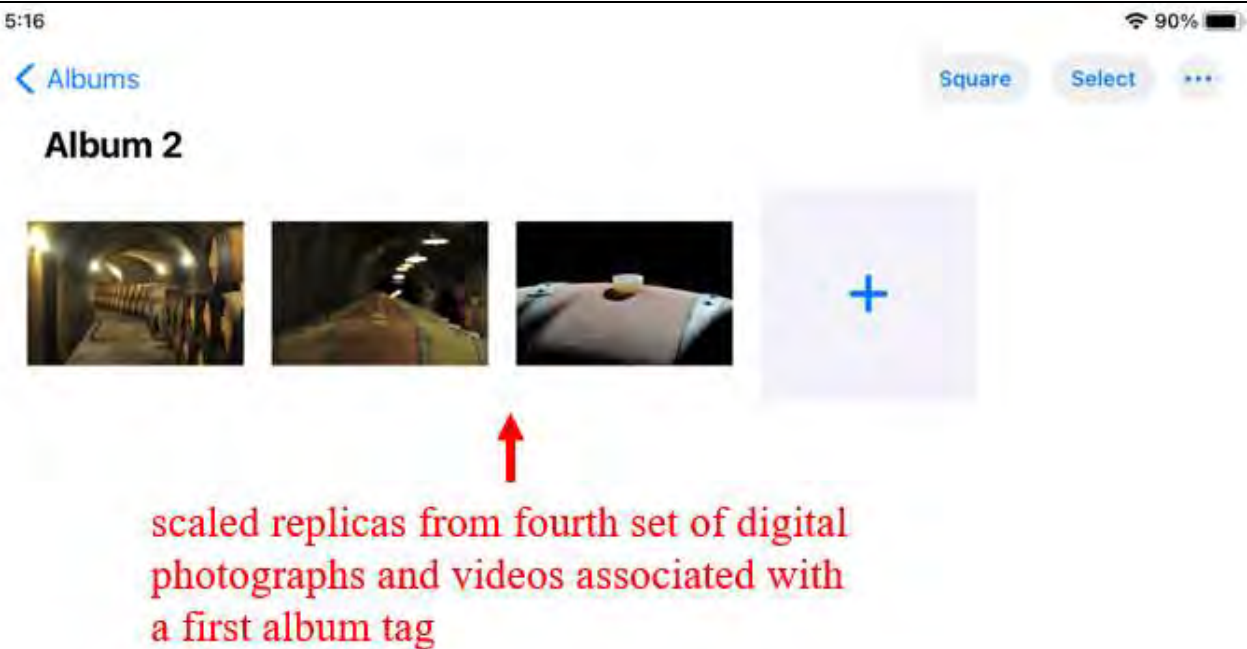


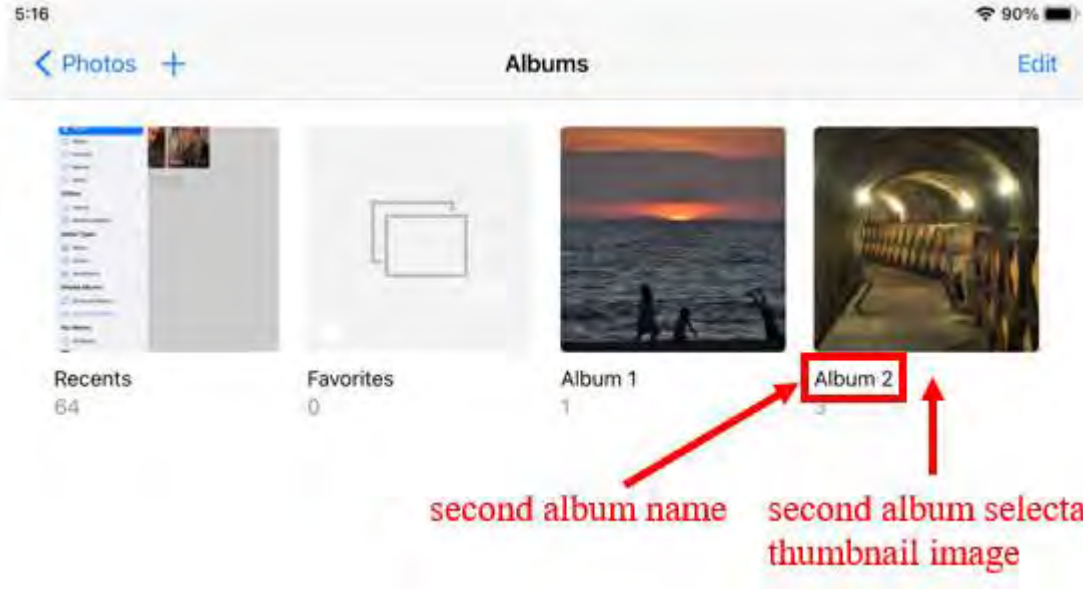

**13[c][iii]** (iii) a second album selectable thumbnail image including a scaled representation of at least one digital photograph in a fourth set of digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag; and

The album view includes a second album selectable thumbnail image.



The second album selectable thumbnail image includes a scaled representation of at least one digital photograph in a fourth set of digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag.

	 <p>5:16 <span style="float: right;">90%</span></p> <p><a href="#">&lt; Albums</a> <span style="float: right;">Square Select ...</span></p> <p><b>Album 2</b></p> <p>Three thumbnails: a tunnel, a road, and a close-up of a hand. A plus sign icon is to the right.</p> <p style="color: red; text-align: center;">↑</p> <p style="color: red; text-align: center;">scaled replicas from fourth set of digital photographs and videos associated with a first album tag</p>
<p><b>13[c][iv]</b> (ii) a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p>	<p>The album view also includes a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p>

	 <p>second album name    second album selectable thumbnail image</p>
<p><b>14.</b> The computer-implemented method of claim 13, further comprising responsive to a click or tap of the first album selectable thumbnail image, displaying a first album view, the displaying the first album view including displaying (i) the</p>	<p>See information for claim 13. Additionally, responsive to tapping the first album selectable thumbnail image, iPadOS displays a first album which includes the first album name associated with the first album and a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos.</p>  <p>first album name</p> <p>scaled replicas from third set of digital photographs and videos associated with first album tag</p>



first album name associated with the first album and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos in the third set of digital photographs and videos.

**15.** The computer-implemented method of claim 14, further comprising responsive to a click or tap of the second album selectable thumbnail image, displaying a second album view, the displaying the second album view including displaying (i) the second album name associated with the second album and (ii) a scaled replica of each of the digital

*See information for claim 14. Additionally, responsive to clicking the second album selectable thumbnail image, a second album view is displayed which includes the second album name associated with the second album and a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs and videos.*



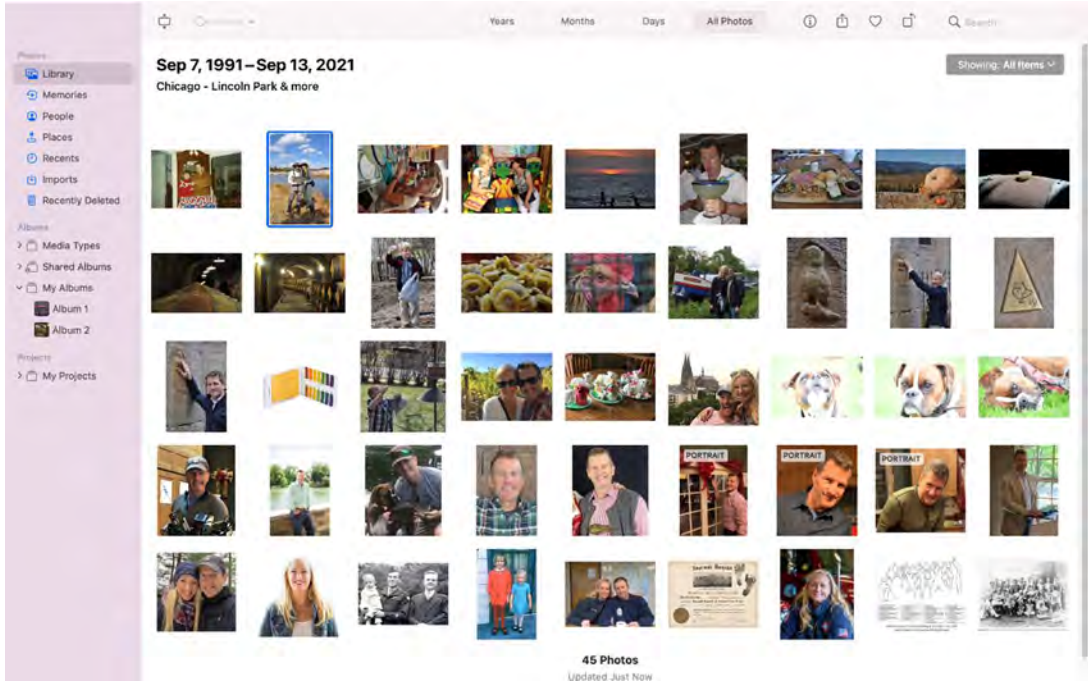
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

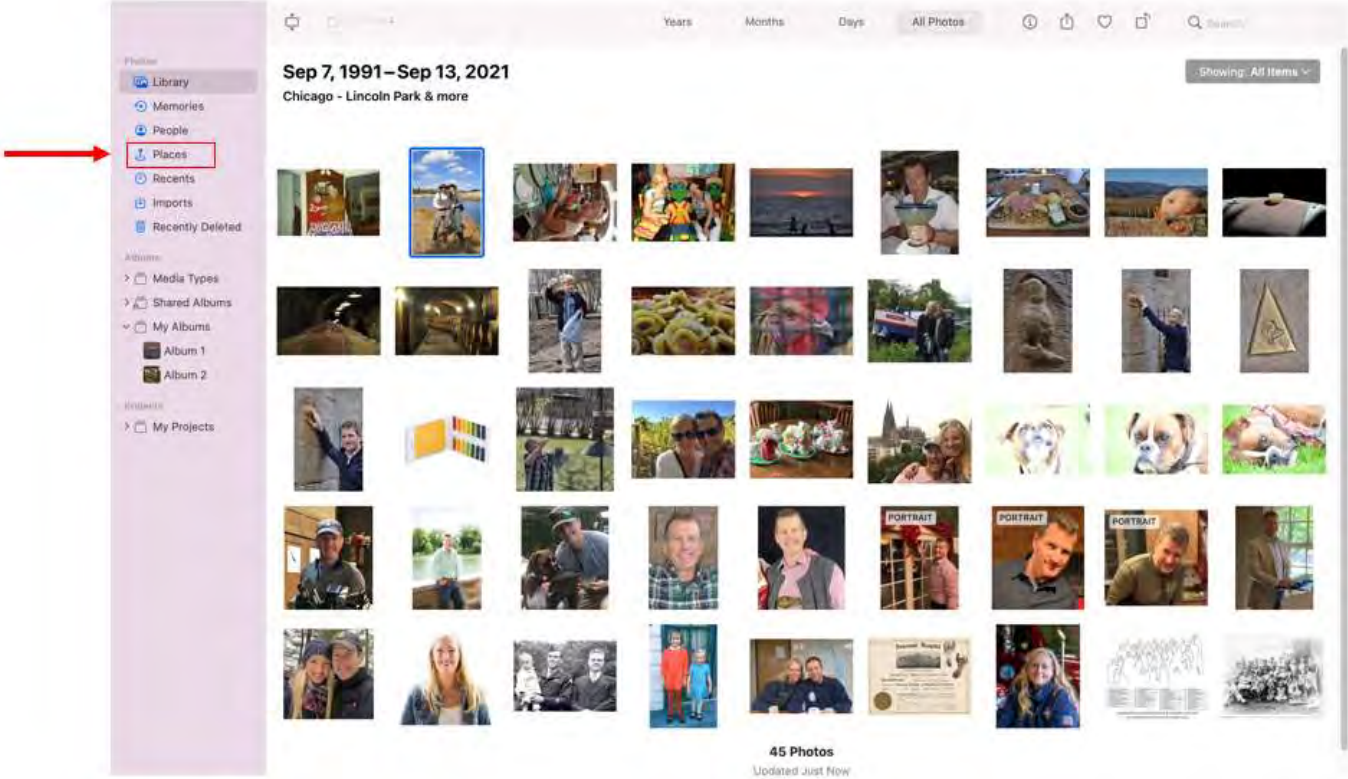
photographs and videos in the fourth set of digital photographs and videos.	

# **Exhibit B.3**

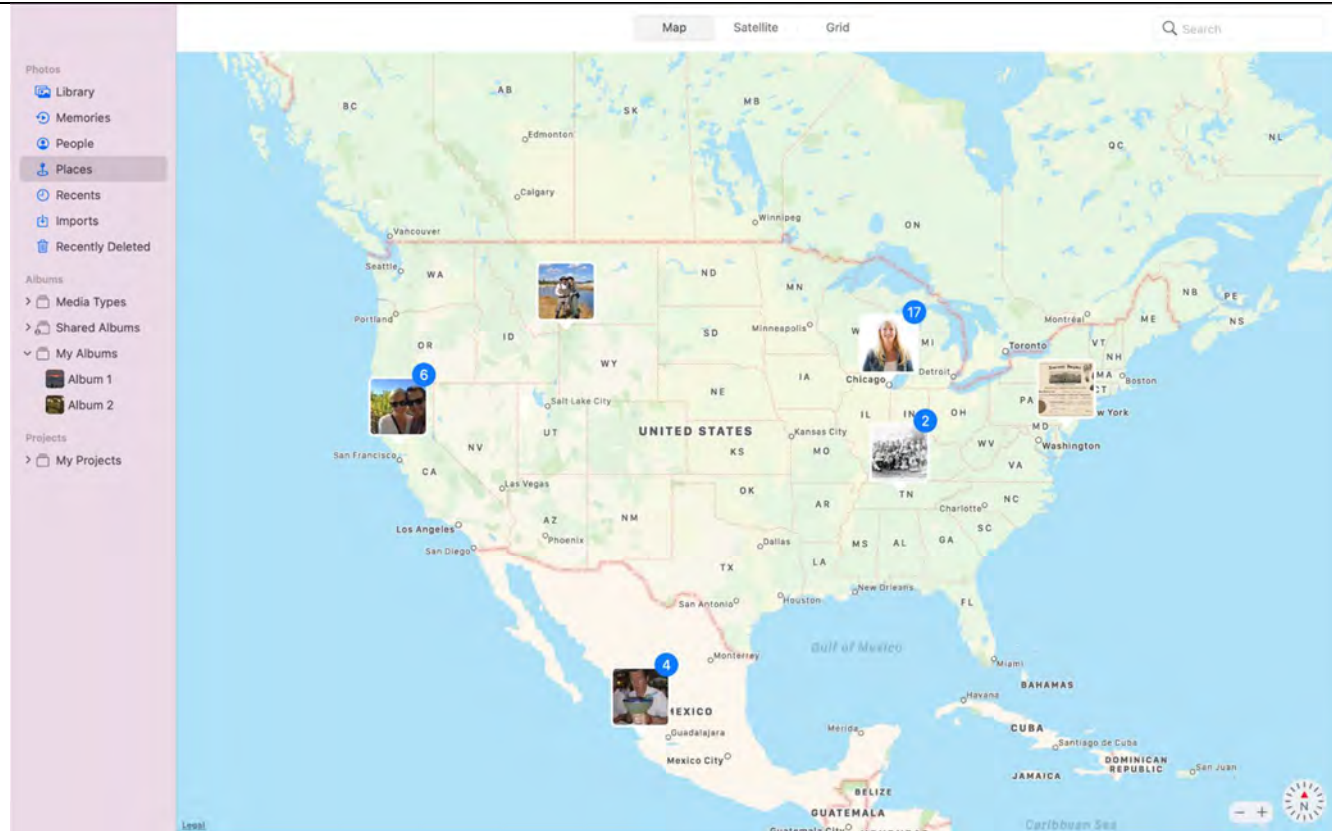
**U.S. Patent No. 10,423,658 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,423,658 (“the ‘658 patent”) in Apple macOS (including the Photos application). The exemplary screenshots below were taken using an Apple MacBook Pro running macOS 11.5.2 and Photos Version 6.0 (361.0.100). While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<p><b>1[pre]</b> A computer-implemented method of displaying at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or</p>	<p>To the extent the preamble is limiting, macOS displays at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or video was taken. <i>See infra.</i></p>  <p>The screenshot shows the Apple Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places, Recents, Imports, Recently Deleted, Albums (Media Types, Shared Albums, My Albums, Album 1, Album 2), and Projects (My Projects). The main area displays a grid of 45 photos. At the top of the main area, it says 'Sep 7, 1991 – Sep 13, 2021' and 'Chicago - Lincoln Park &amp; more'. At the bottom, it says '45 Photos Updated Just Now'. The photos in the grid are various images, including portraits, landscapes, and group photos.</p>

<p>video was taken, the method comprising:</p>	
<p><b>1[a]</b> displaying an application view on a video display device including displaying a plurality of selectable elements, the plurality of selectable elements including a location selectable element;</p>	<p>macOS displays an application view on a video display device (e.g., an Apple MacBook) including a plurality of selectable elements. The plurality of selectable elements includes a location selectable element (Places).</p>  <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places (highlighted with a red box and a red arrow), Recents, Imports, and Recently Deleted. Below these are sections for Albums and My Projects. The main area displays a grid of photos for a specific location, titled 'Sep 7, 1991 - Sep 13, 2021' and 'Chicago - Lincoln Park &amp; more'. The grid contains 45 photos, with a '45 Photos Updated Just Now' indicator at the bottom. At the top of the main area, there are navigation tabs for 'Years', 'Months', 'Days', and 'All Photos', along with icons for refresh, share, favorite, and search.</p>
<p><b>1[b]</b> responsive to a click or tap of the location selectable element, displaying a</p>	<p>Responsive to a click or tap of the location selectable element, macOS displays a map view on a video display device (e.g., an Apple MacBook).</p>

map view on a video display device, the displaying the map view including displaying:

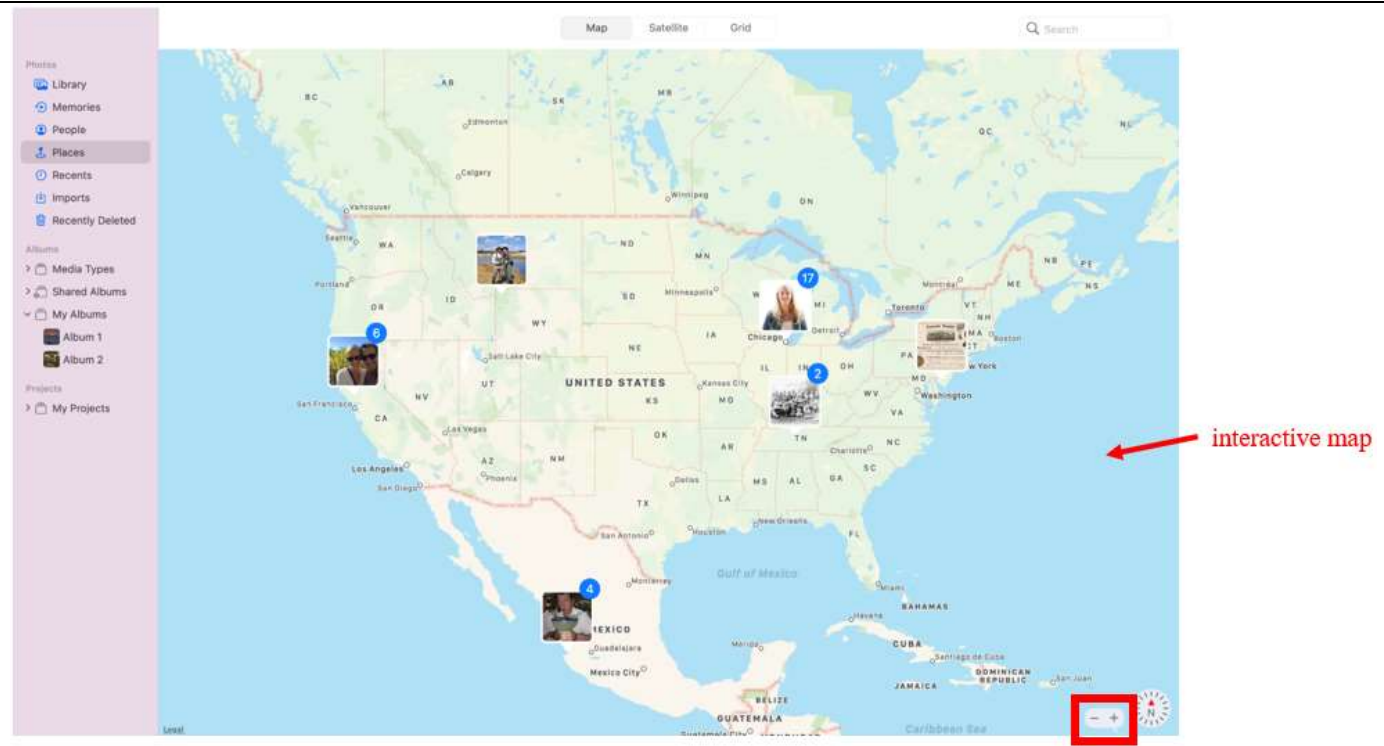


1[b][i] (i) a representation of an interactive map;

As shown below, the map view includes a representation of an interactive map.



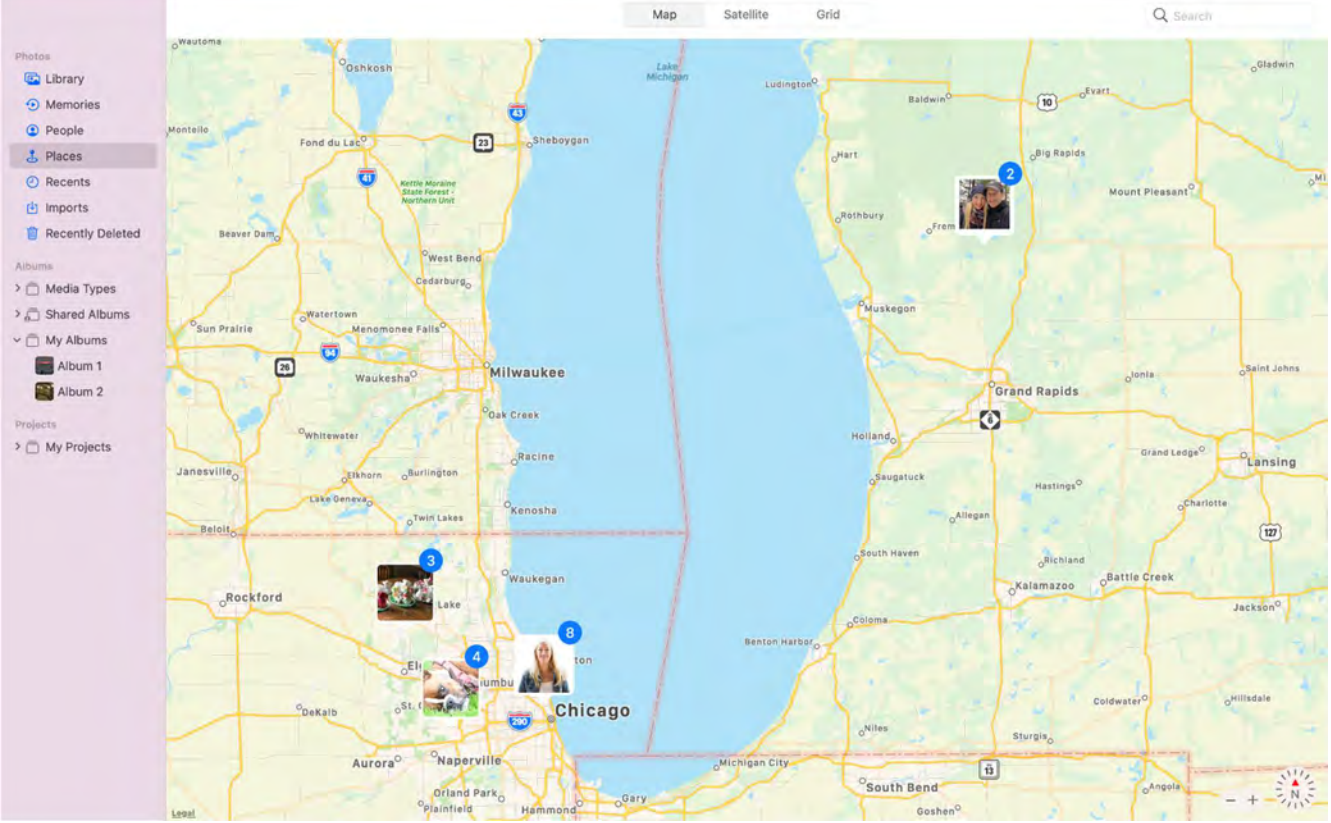
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – Apple macOS



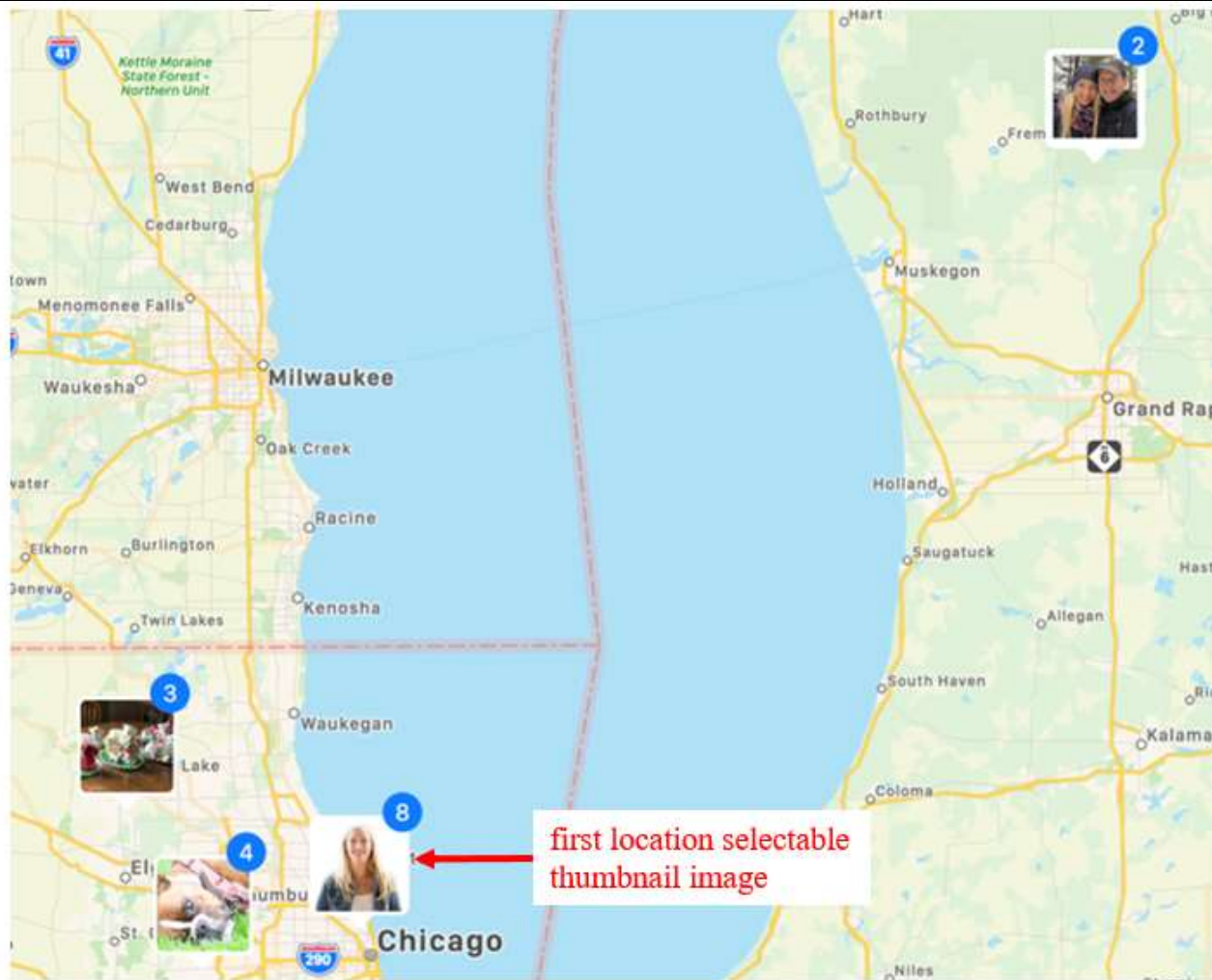
The map is interactive at least because macOS can zoom in or out, as shown below.



Initial Infringement Contentions – U.S. Patent No. 10,423,658 – Apple macOS

	
<p><b>1[b][iii]</b> (ii) a first location selectable thumbnail image at a first location on the interactive map, the first location being associated with the geographic</p>	<p>Displaying the map view includes displaying a first location selectable thumbnail image at a first location on the interactive map.</p>

coordinates of a first geotag,

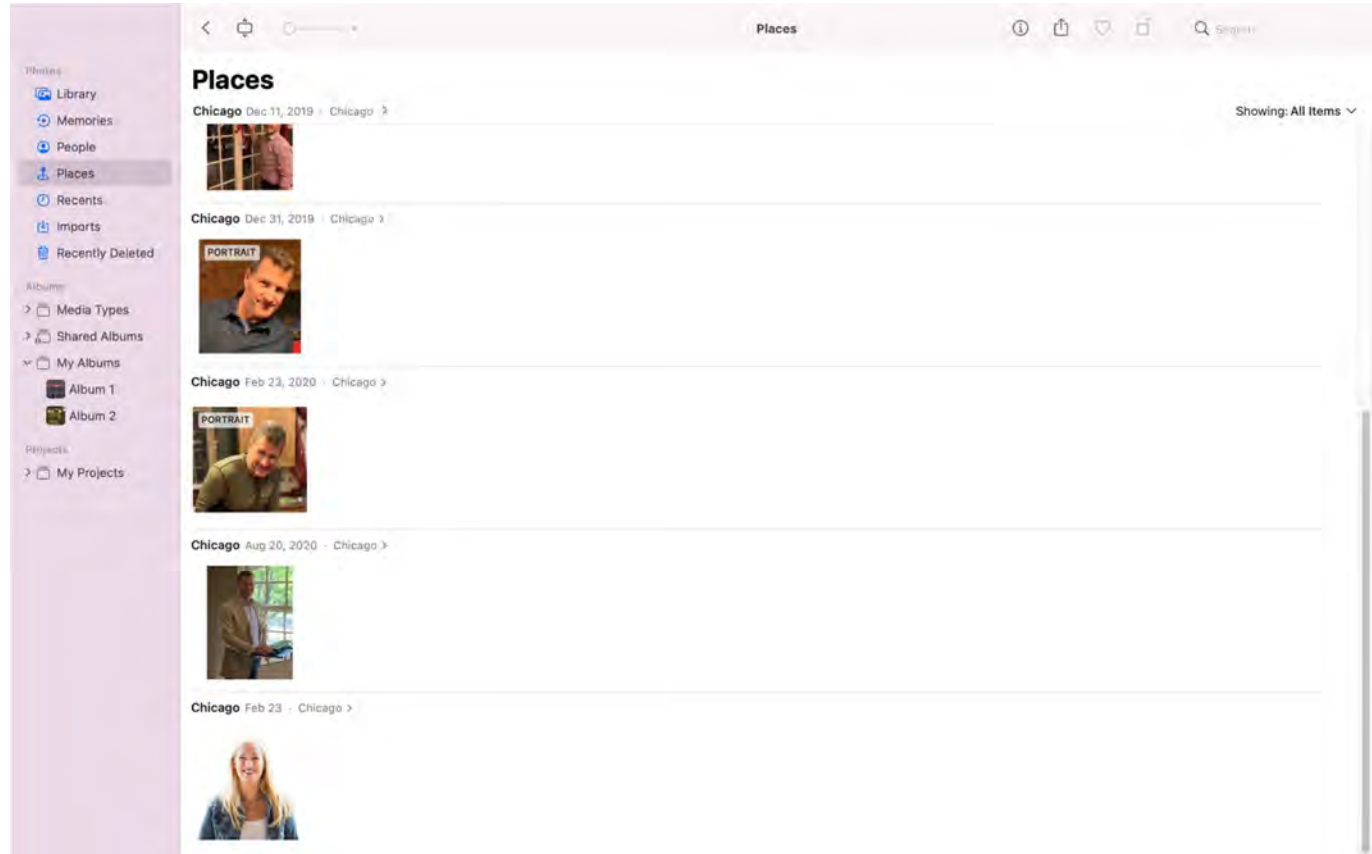


The first location is associated with the geographic coordinates of a first geotag. In this example, the first location selection thumbnail is associated with Chicago, Illinois. *See also* information for limitation 1[b][ii][A].

**1[b][ii][A]** a first set of digital

The first location selectable thumbnail image is associated with a first set of digital photographs and videos including all of the digital photographs and videos associated with the first geotag (in this example, Chicago, Illinois).

photographs and videos including all of the digital photographs and videos associated with the first geotag;



**1[b][iii]** (iii) a first count value image partially overlapping the first location selectable thumbnail image, the first count value

Displaying the map view includes displaying a first count value image partially overlapping the first location selectable thumbnail image. The first count value image including a first number (in this example, 8), which corresponds to the number of digital photographs and videos in the first set of photographs and videos.

image including a first number that corresponds to the number of digital photographs and videos in the first set of digital photographs and videos;

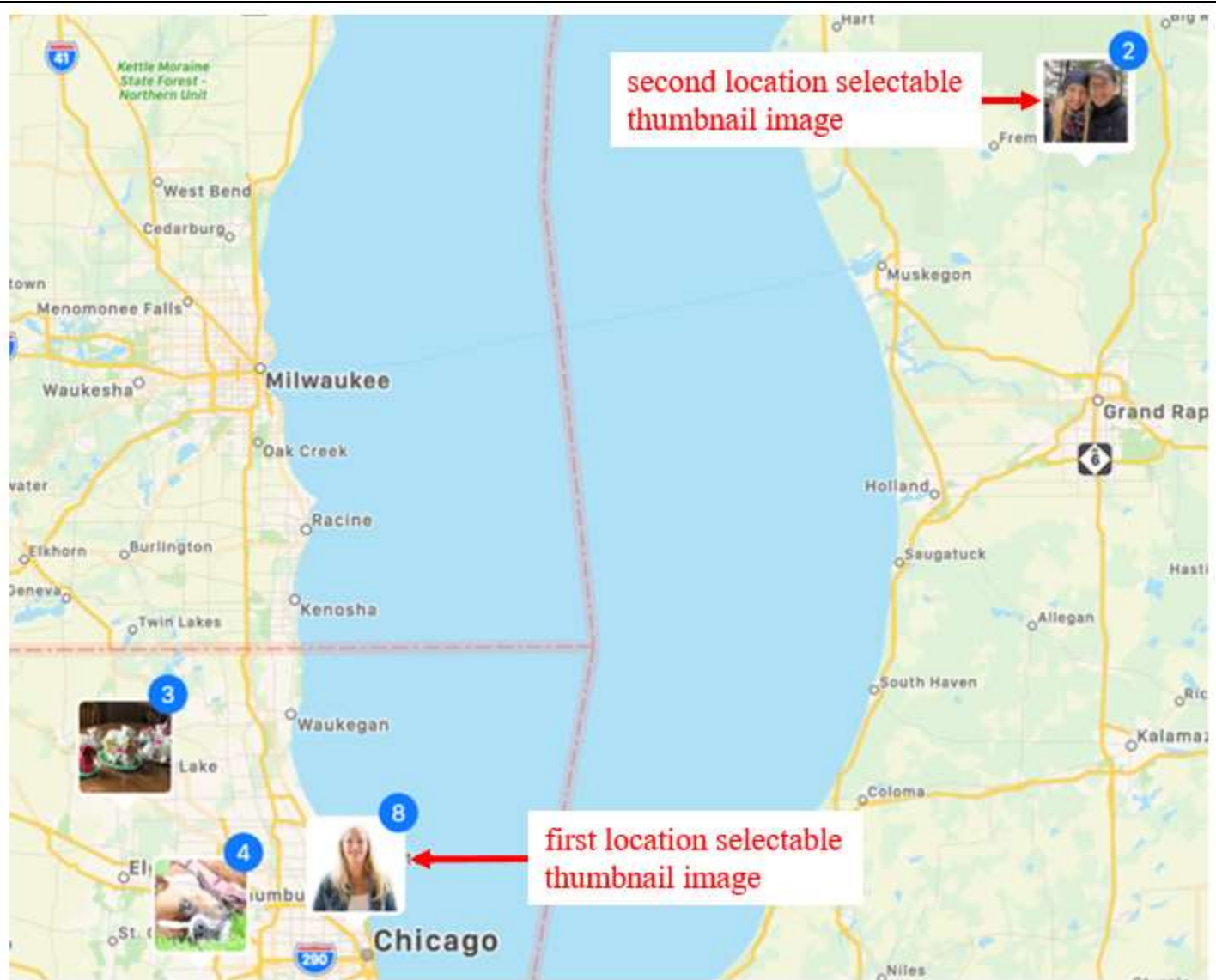


**1[b][iv]** (iv) a second location selectable thumbnail image at a second location on the interactive map, the second location being associated with the geographic

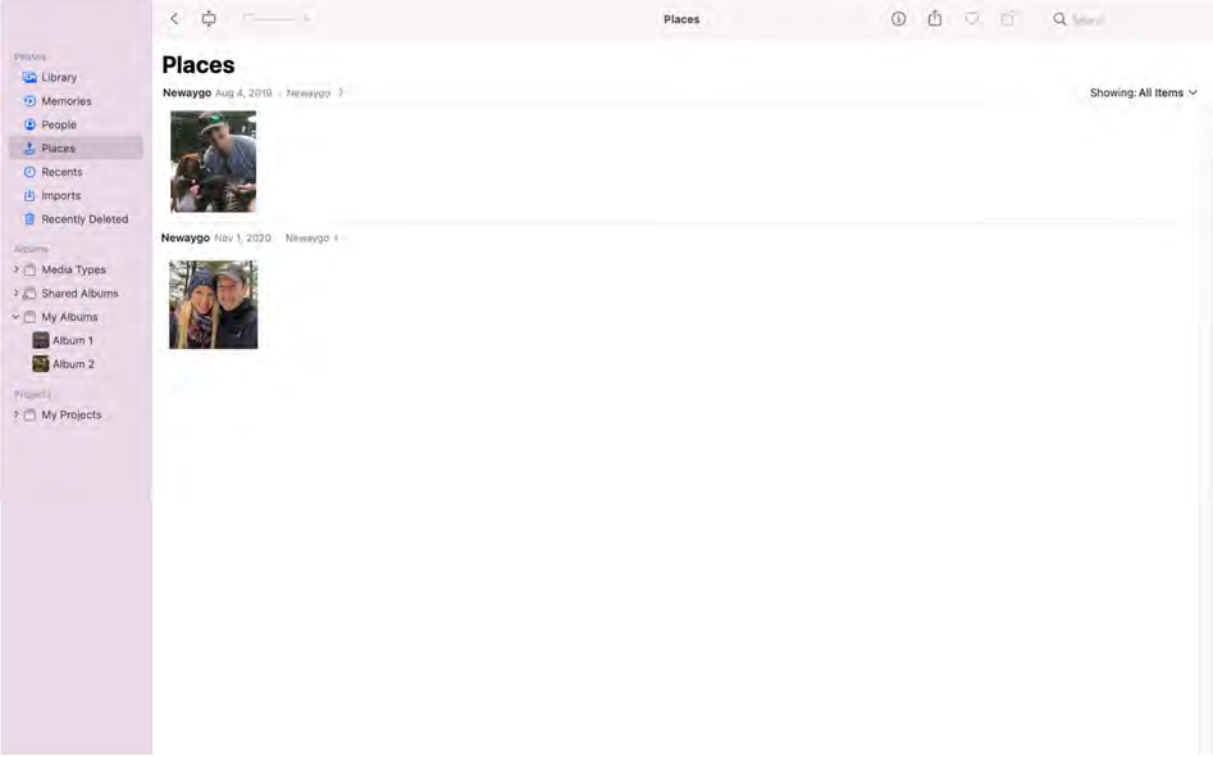
Displaying the map view includes displaying a second location selectable thumbnail image at a second location on the interactive map.




coordinates of a second geotag,



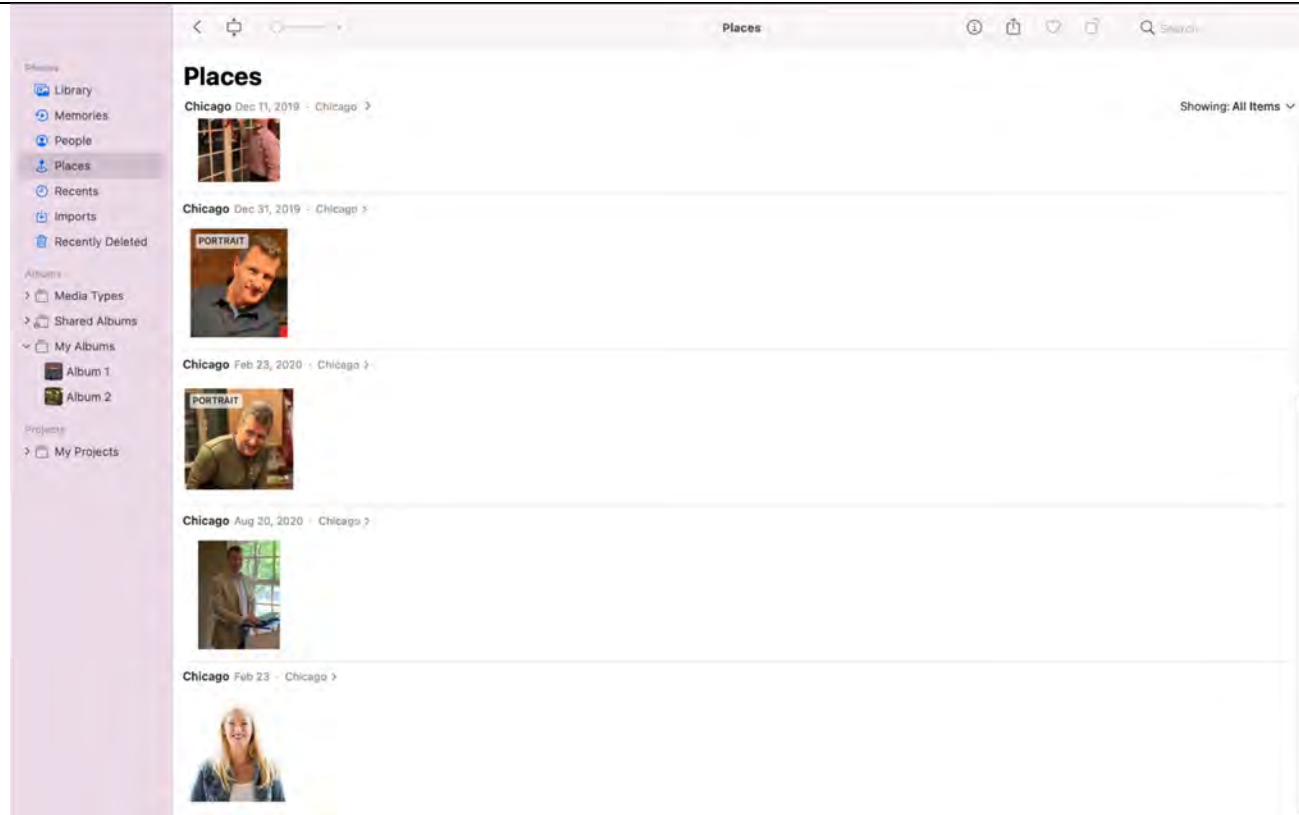
The second location is associated with the geographic coordinates of a second geotag. *See also* information for 1[b][iv][A].

<p><b>1[b][iv][A]</b> a second set of digital photographs and videos including all of the digital photographs and videos associated with the second geotag; and</p>	<p>The second location selectable thumbnail image is associated with a second set of digital photographs and videos including all of the digital photographs and videos associated with the second geotag.</p> 
<p><b>1[b][v]</b> (v) a second count value image partially overlapping the second location selectable thumbnail image, the</p>	<p>Displaying the map view includes displaying a second count value image partially overlapping the second location selectable thumbnail image. The second count value image includes a second number (in this example, 2), which corresponds to the number of digital photographs and videos in the second set of digital photographs and videos.</p>

<p>second count value image including a second number that corresponds to the number of digital photographs and videos in the second set of digital photographs and videos;</p>	
<p><b>1[c]</b> responsive to a click or tap of the first location selectable thumbnail image, displaying a first location view on the video display device, the displaying the first location</p>	<p>Responsive to a click or tap of the first location selectable thumbnail image, macOS displays a first location view on the video display device.</p>

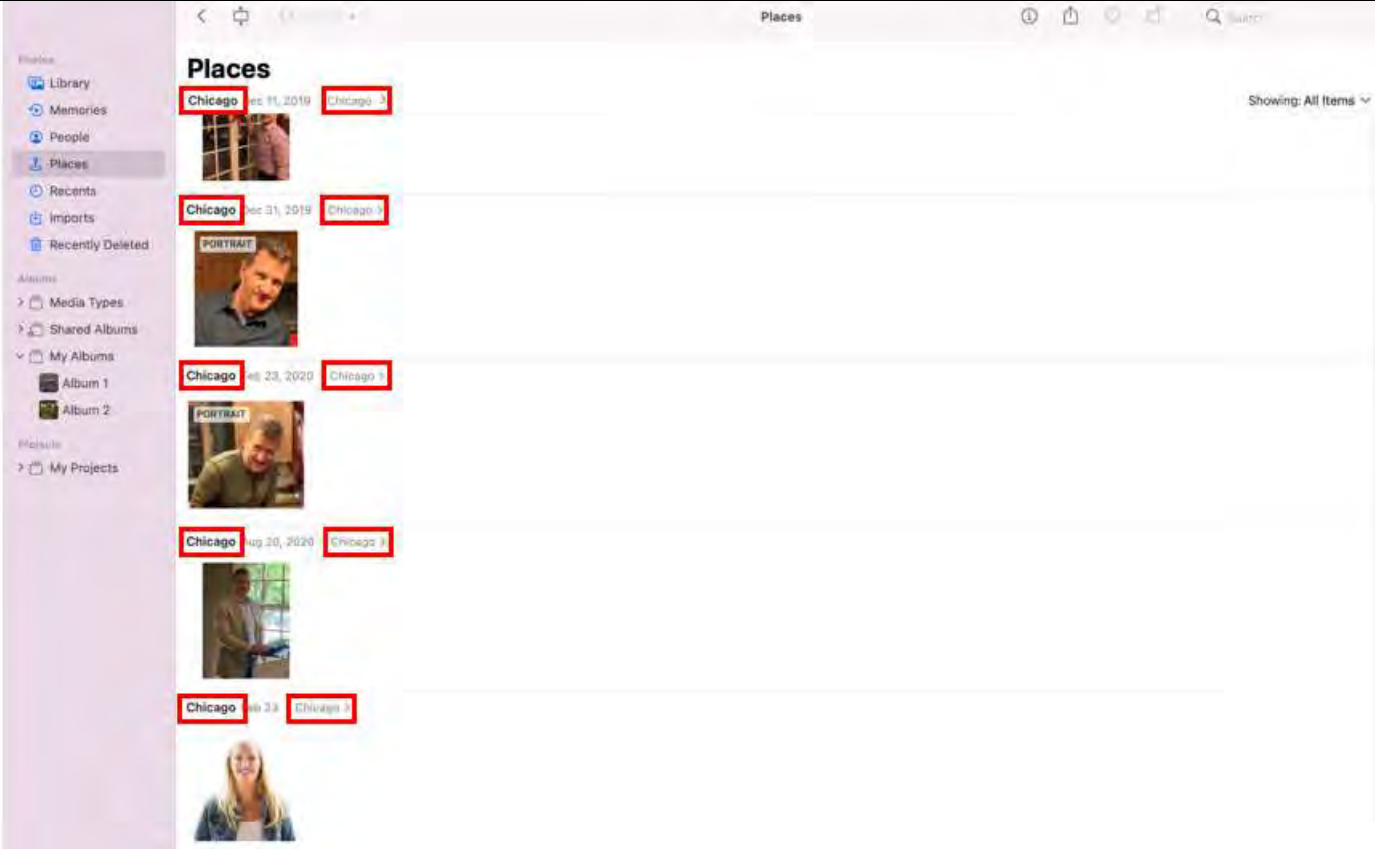


view including displaying

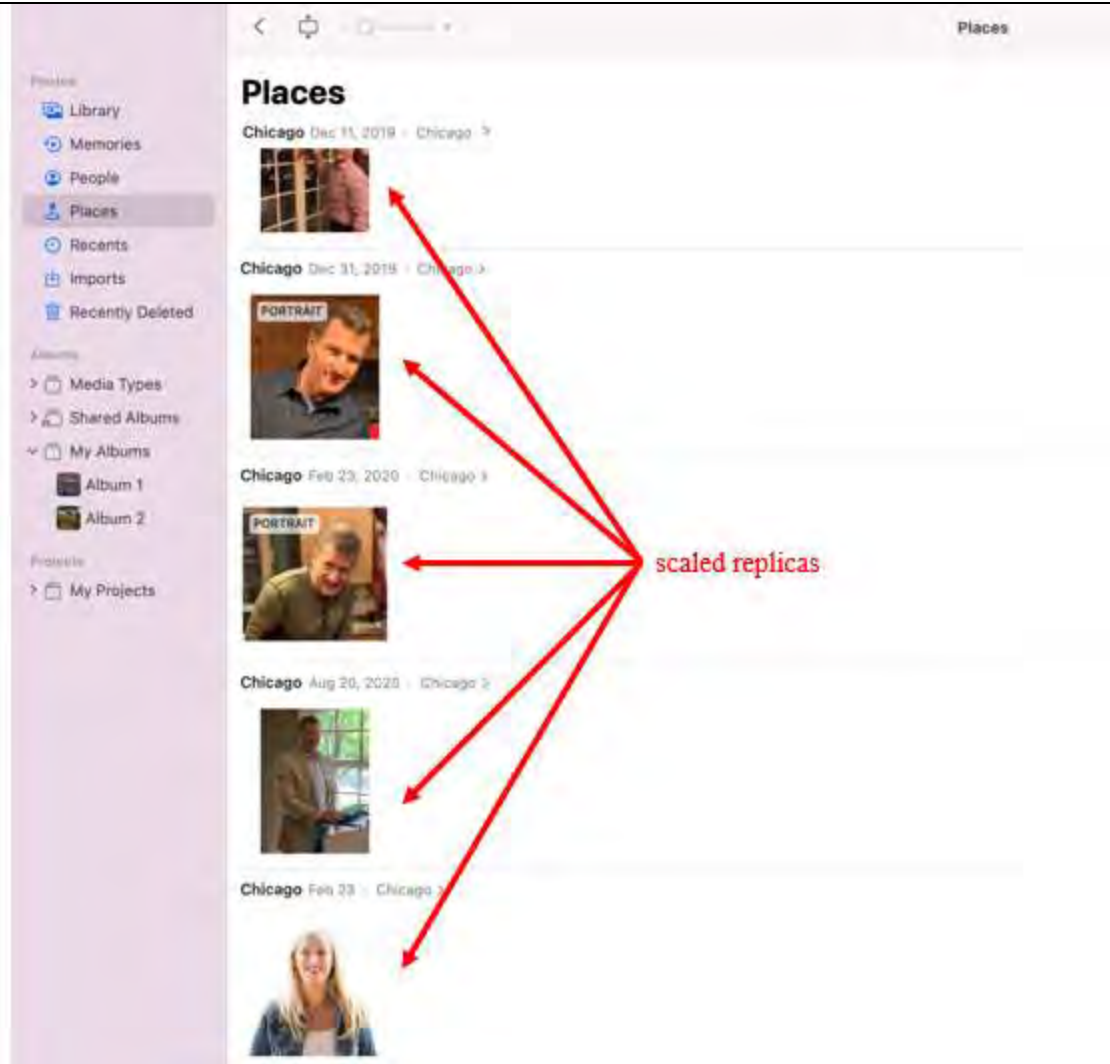


**1[c][i]** (i) a first location name associated with the first geotag and

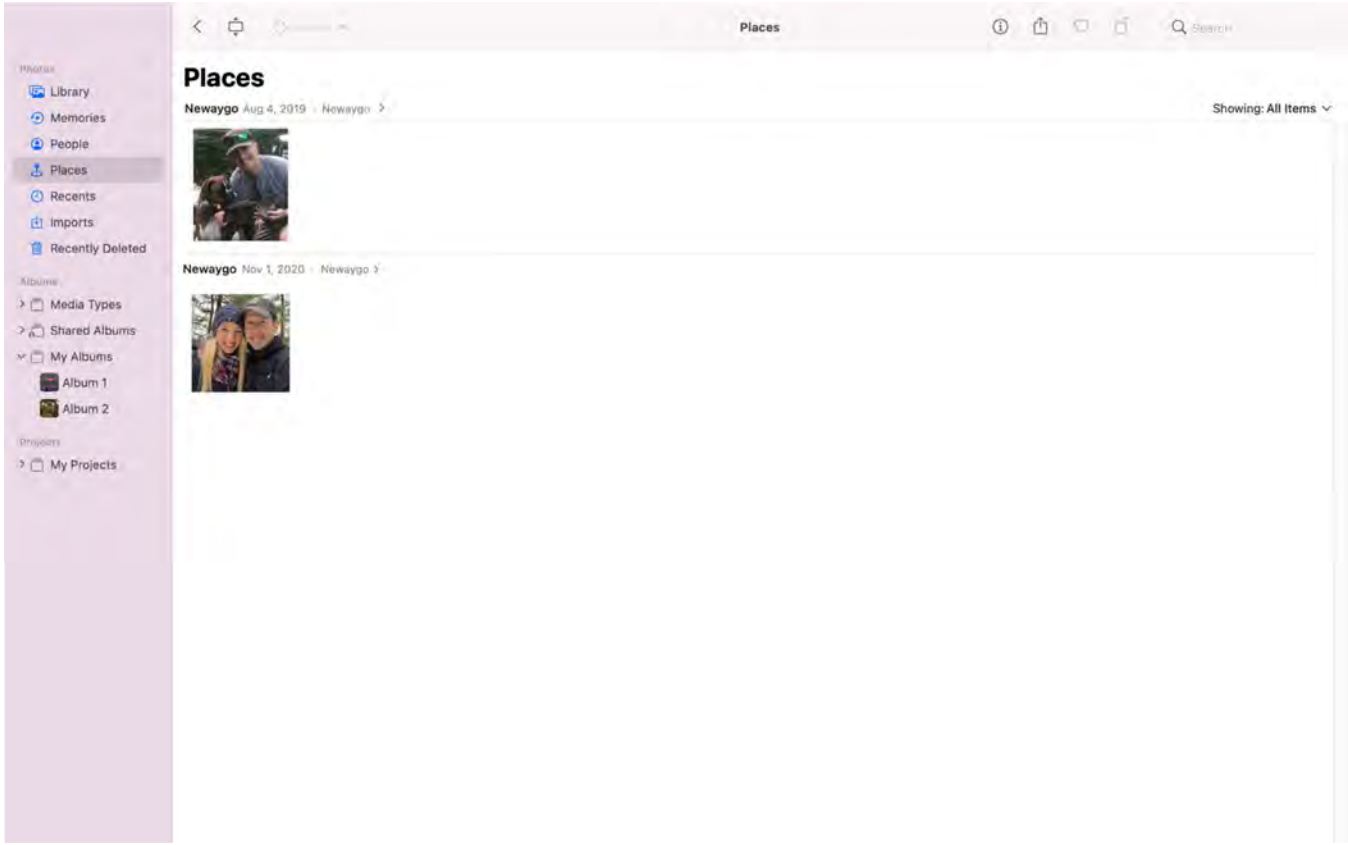
The first location view includes a first location name (in this example, Chicago) associated with the first geotag.

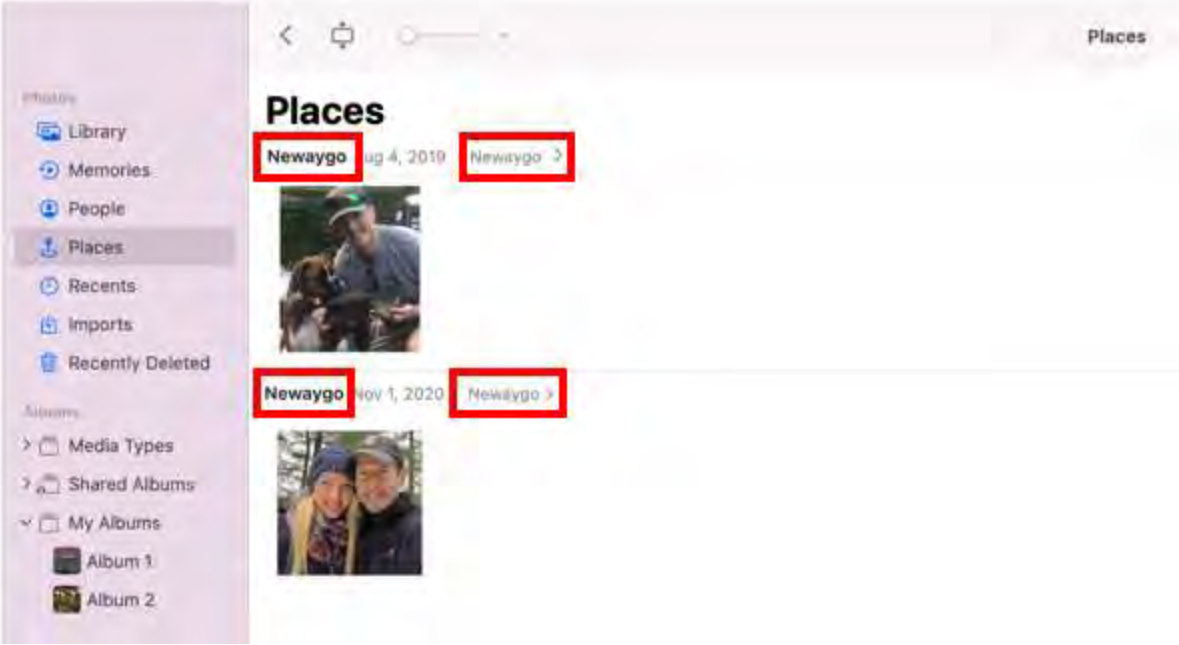
	
<p><b>1[c][ii]</b> ii) a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos, the</p>	<p>The first location view includes a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos.</p>

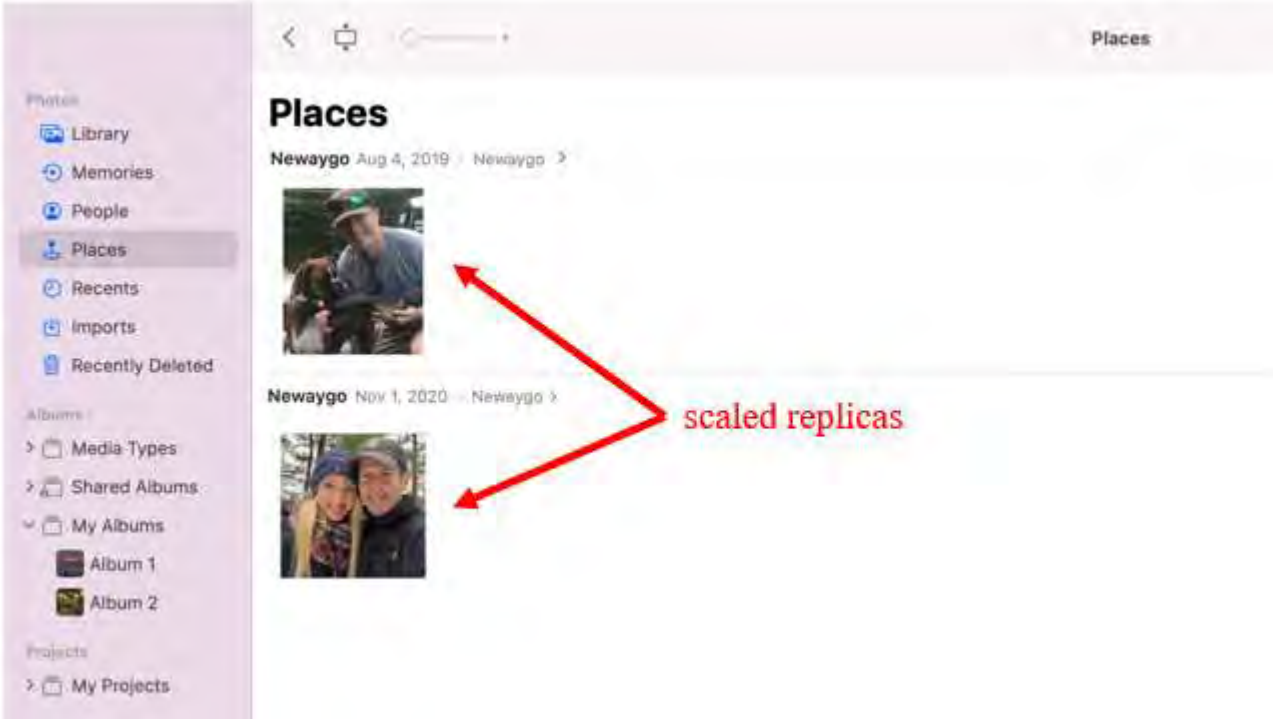
displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos not being overlaid on the interactive map; and



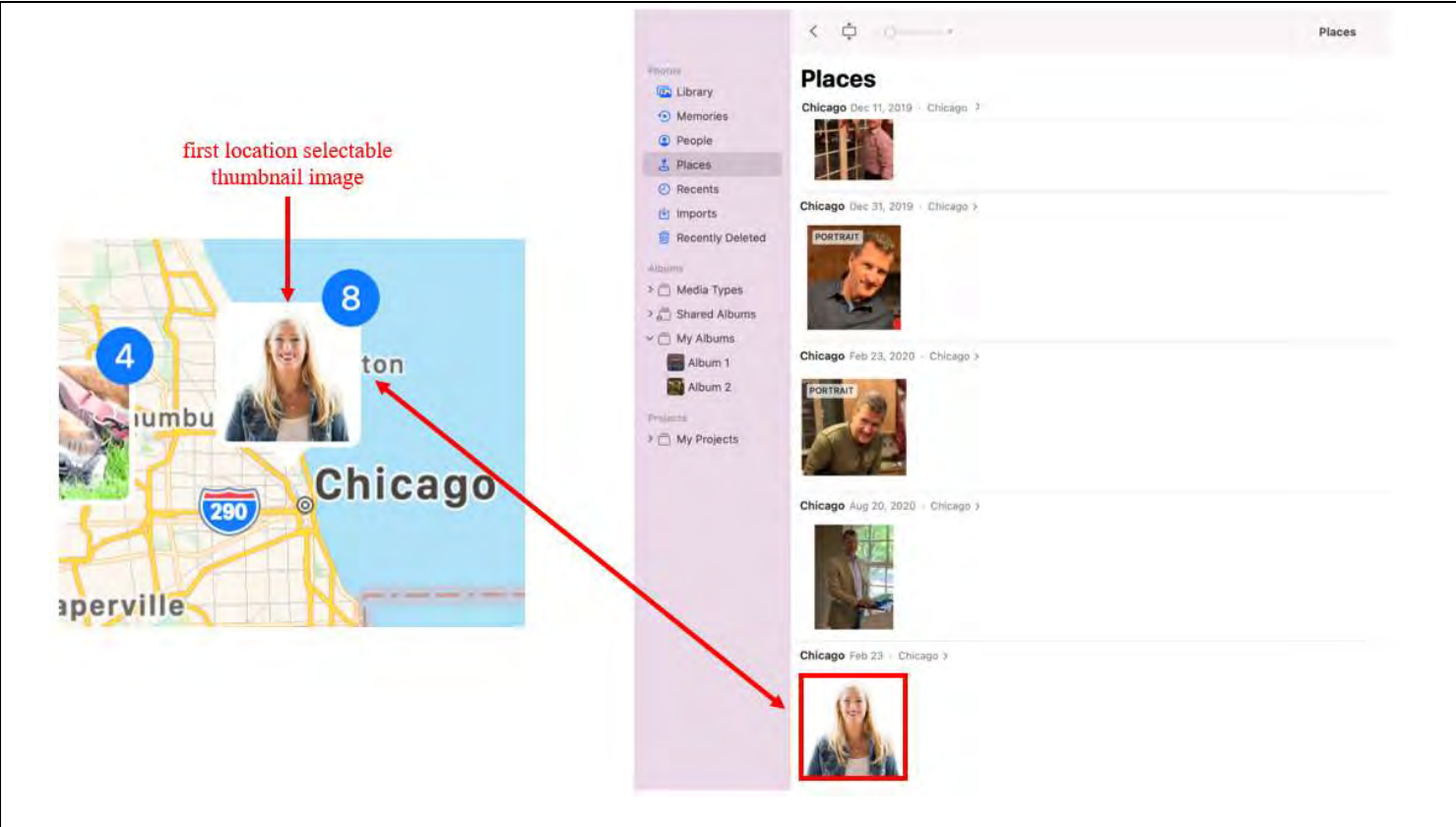
*See also* information for limitation 3[a]. As shown above, the displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos are not overlaid on the interactive map. *See* limitation 1[b][i].

<p><b>1[d]</b> responsive to a click or tap of the second location selectable thumbnail image, displaying a second location view on the video display device, the displaying the second location view including displaying</p>	<p>Responsive to a click or tap of the second location selectable thumbnail image, macOS displays a second location view on the video display device.</p> 
<p><b>1[d)]i]</b> (i) a second location name corresponding to the second geotag and</p>	<p>The second location view includes a second location name (in this example, Newaygo) corresponding to the second geotag.</p>

	
<p><b>1[d][ii]</b> (ii) a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos, the displayed scaled replicas of each of the digital photographs and videos in the</p>	<p>The second location view also includes a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos.</p>

<p>second set of digital photographs and videos not being overlaid on the interactive map.</p>	 <p>As shown above, the displayed scaled replicas of each of the digital photographs and videos in the second set of digital photographs and videos are not overlaid on the interactive map. <i>See</i> limitation 1[b][i].</p>
<p><b>2[pre]</b> The computer-implemented method of claim 1, wherein</p>	<p><i>See</i> information for claim 1.</p>
<p><b>2[a]</b> the first location selectable thumbnail image</p>	<p>As shown below, the first location selectable thumbnail image (<i>see</i> limitation 1[b][ii]) includes a scaled representation of at least one of the digital photographs in the first set of digital photographs (<i>see</i> limitation 1[b][ii][A]).</p>

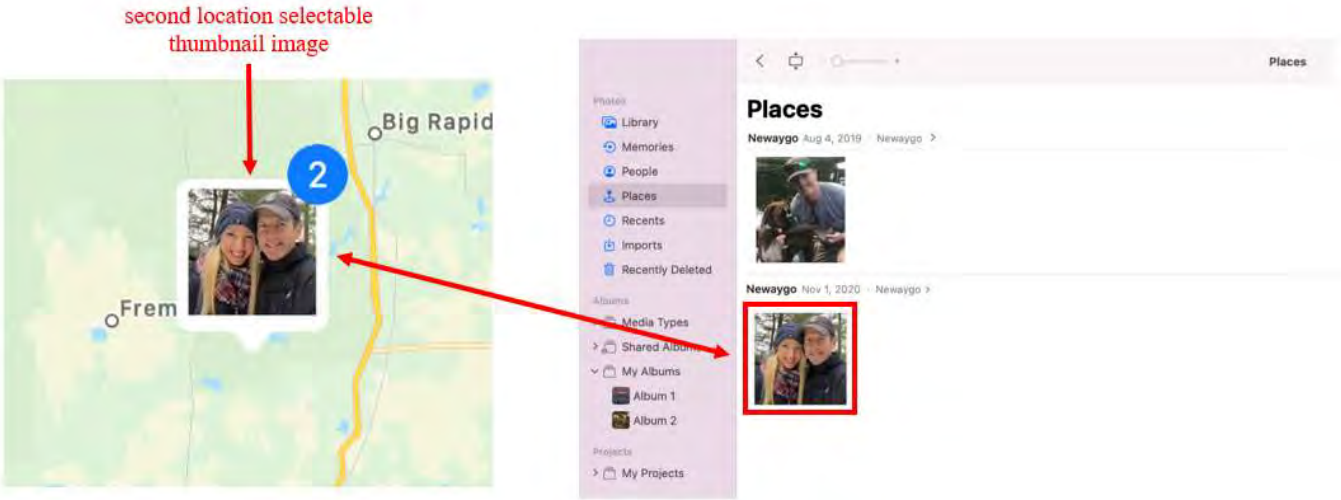
includes a scaled representation of at least one of the digital photographs in the first set of digital photographs, and



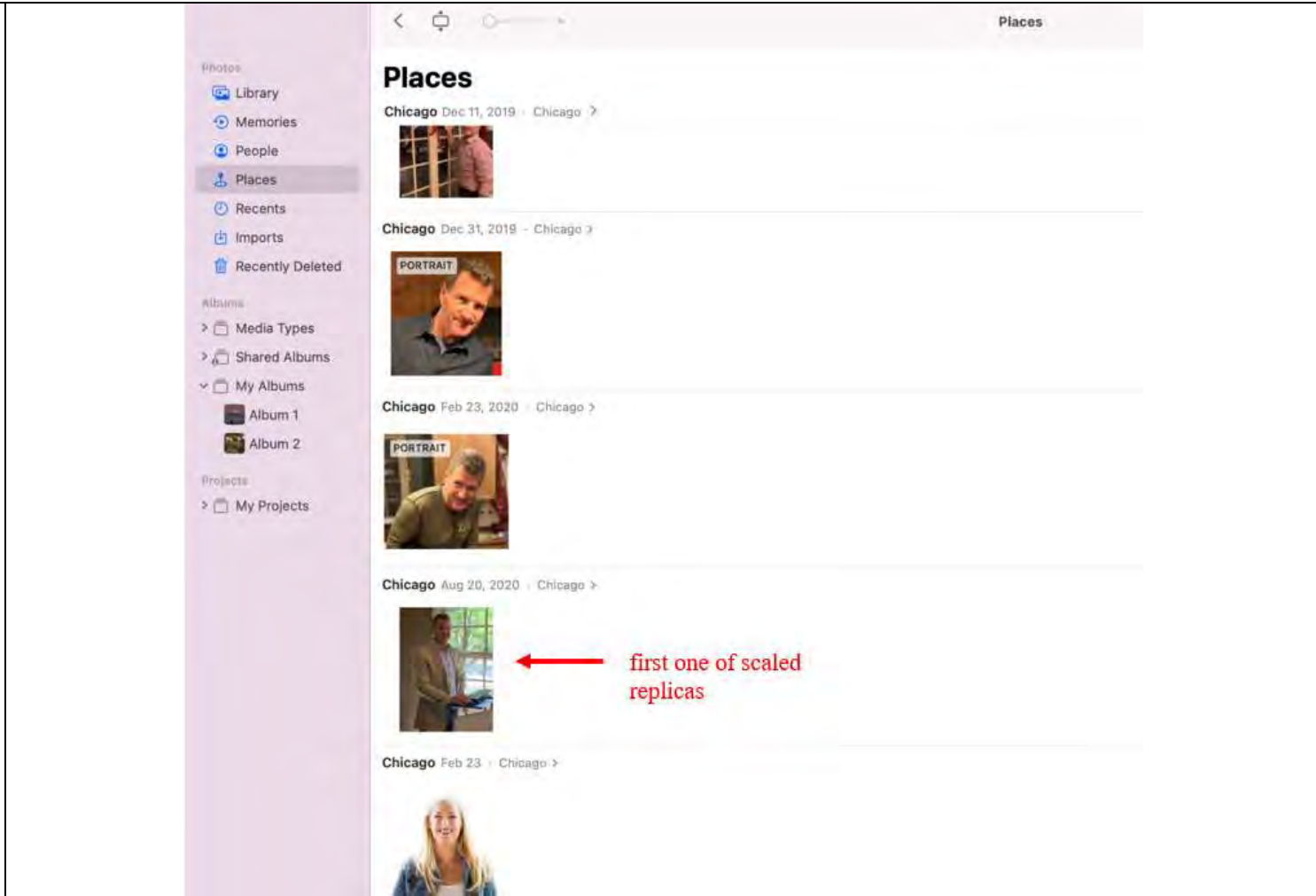
**2[b]** and wherein the second location selectable thumbnail image includes a scaled representation of at least one of the digital photographs in the second set of


The second location selectable thumbnail image (*see* limitation 1[b][iv]) includes a scaled representation of at least one of the digital photographs in the second set of digital photographs (*see* limitation 1[b][iv][A]).

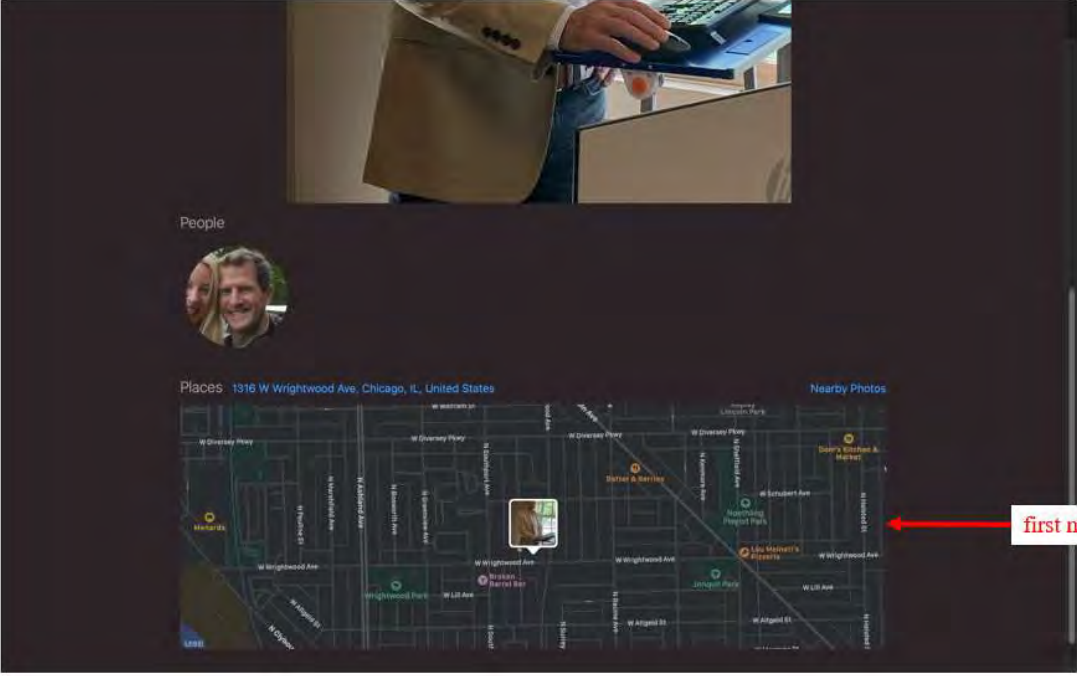


<p>digital photographs.</p>	 <p>The image shows a screenshot of the macOS Photos app. On the left, a map view displays a location with a photo thumbnail. A red arrow points to the thumbnail with the text "second location selectable thumbnail image". A blue circle with the number "2" is overlaid on the thumbnail. On the right, the "Places" sidebar is visible, showing a list of photos. A red arrow points from the thumbnail on the map to a photo in the sidebar, which is highlighted with a red box.</p>
<p><b>3[pre]</b> The computer-implemented method of claim 1, further comprising</p>	<p>See information for claim 1.</p>
<p><b>3[a]</b> responsive to a click or tap of a first one of the displayed scaled replicas in the first location view, displaying a first digital photograph associated with the first scaled replica in the</p>	<p>Responsive to clicking one of the scaled replicas in the first location view (<i>see</i> limitation 1[c][ii]), macOS displays a first digital photograph associated with the first scaled replica.</p>

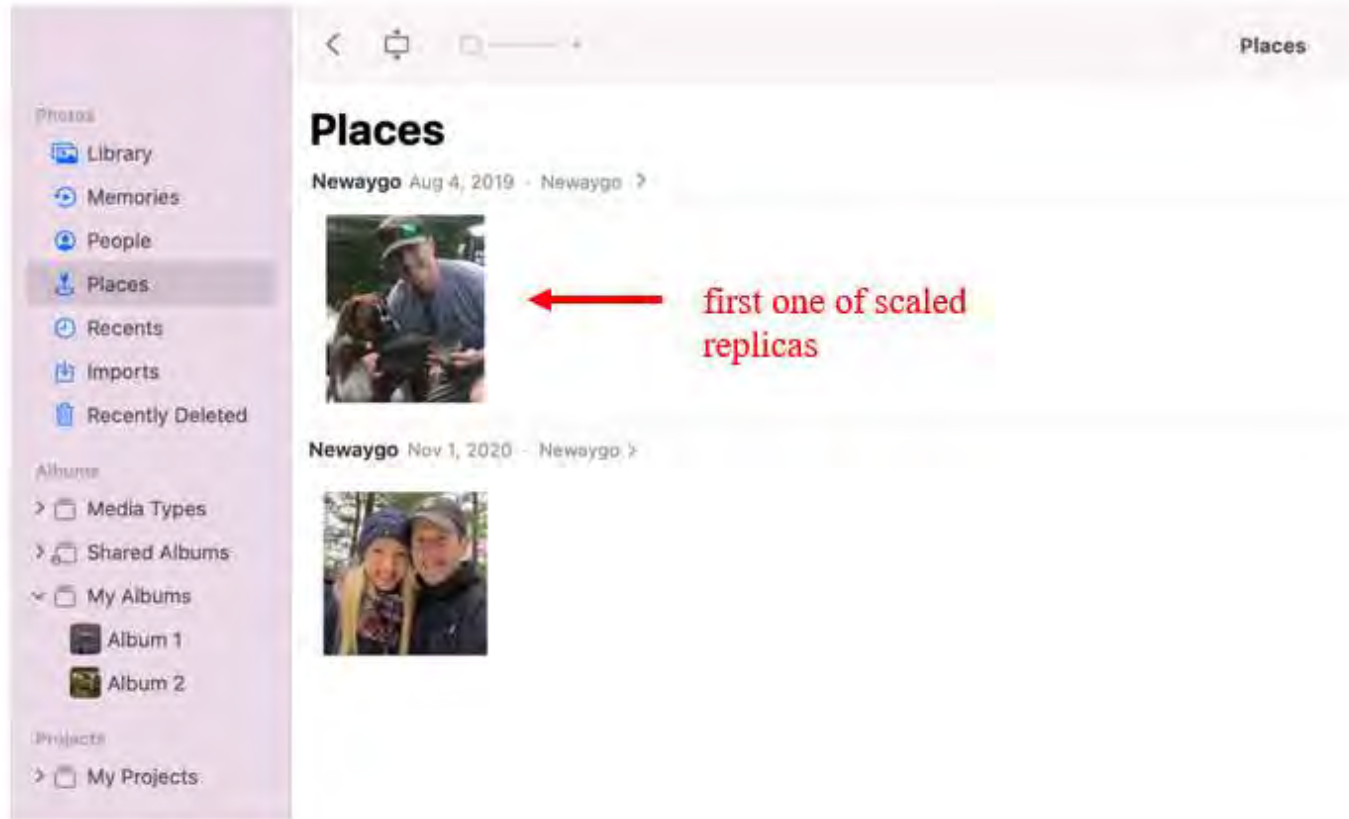
first location  
view and




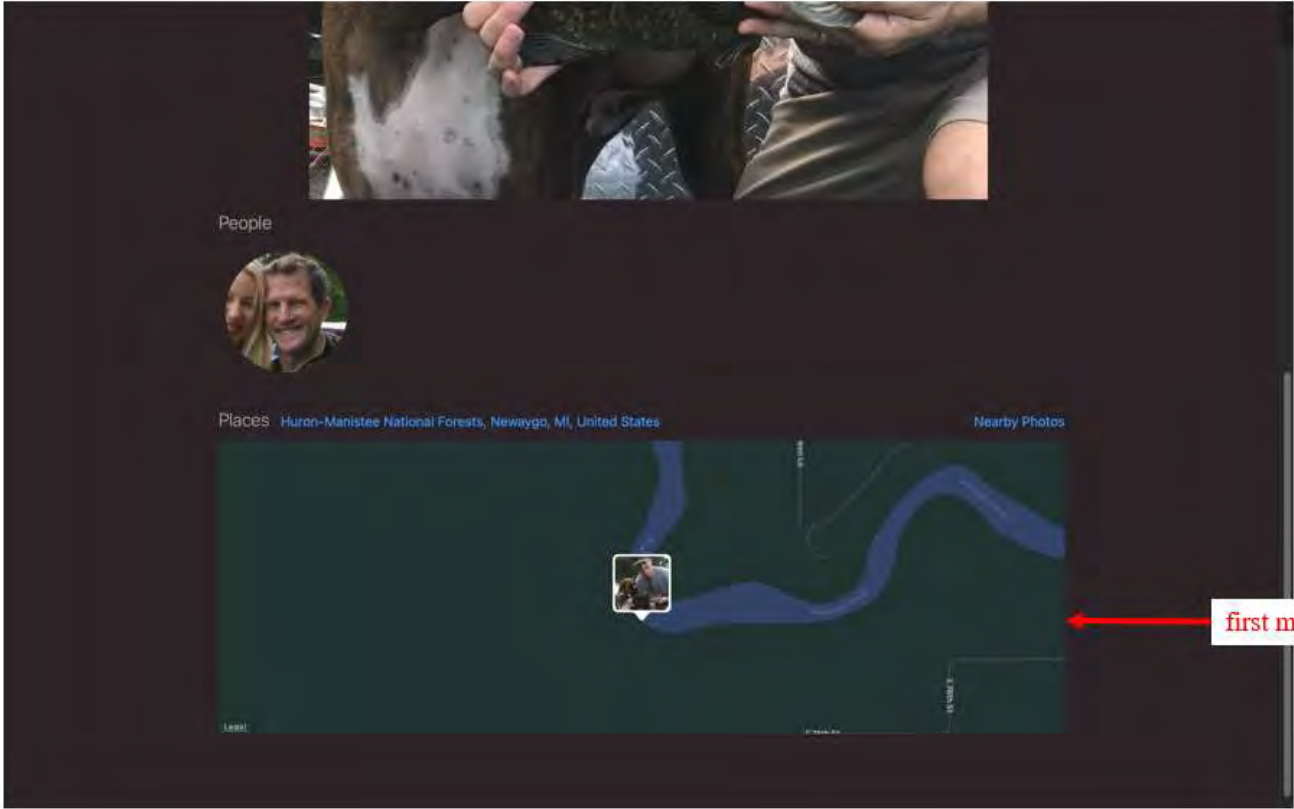
	
<p><b>3 b)</b> a first map image indicating the geographic coordinates of the first geotag.</p>	<p>macOS displays a first map image indicating the geographic coordinates of the first geotag below the first digital photograph, as shown below:</p>

	
<p><b>4[pre]</b> The computer-implemented method of claim 3, further comprising</p>	<p>See information for claim 1.</p>
<p><b>4[a]</b> responsive to a click or tap of a first one of the displayed scaled replicas in the second location view, displaying a first</p>	<p>Responsive to a click or tap of one of the scaled replicas in the second location view, macOS displays a second digital photograph associated with the second scaled replica is displayed.</p>

digital photograph associated with the first scaled replica in the second location view and

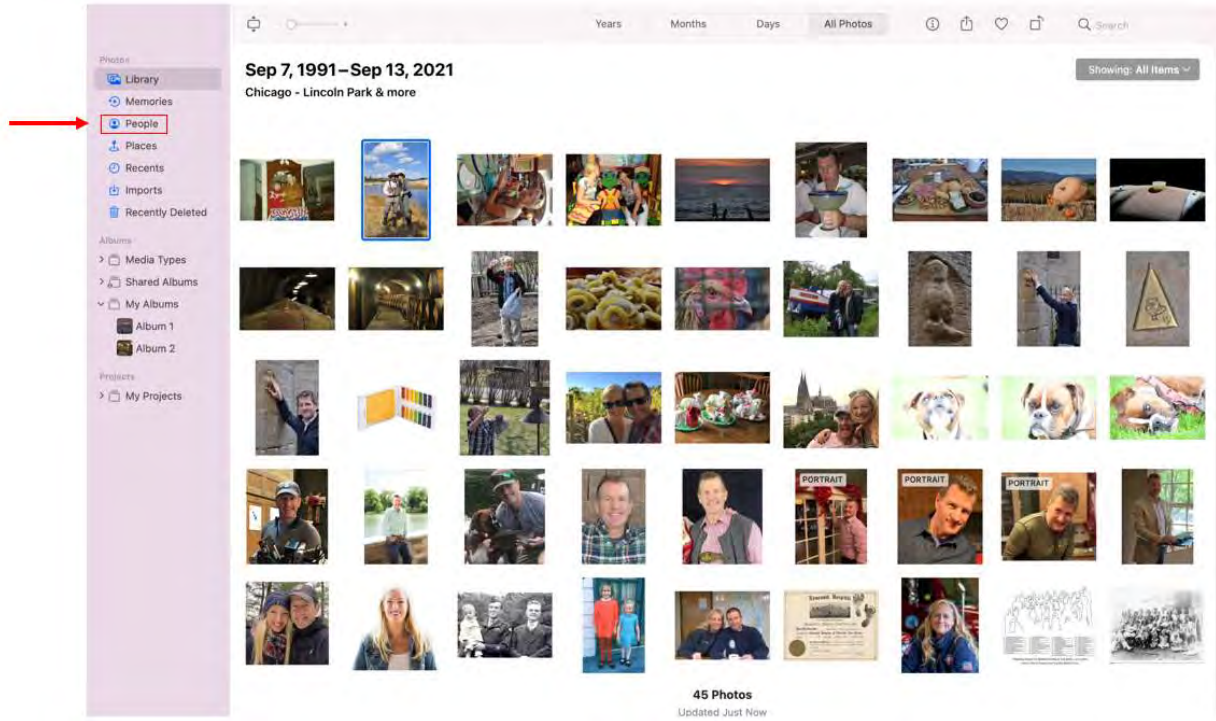


	 <p>A photograph of a man wearing a grey t-shirt and a cap, smiling while holding a large fish. A dog is sitting next to him. A red arrow points to the photo with the text "first digital photograph".</p>
<p><b>4[b]</b> a second map image indicating the geographic coordinates of the second geotag.</p>	<p>macOS displays a second map image indicating the geographic coordinates of the second geotag below first digital photograph, as shown below.</p>

	 <p>The screenshot shows a mobile application interface with a dark background. At the top, there is a large photo of a person holding a dog. Below this, the word 'People' is displayed above a circular profile picture of a man. Underneath, the text 'Places Huron-Manistee National Forests, Newaygo, MI, United States' is shown. A map is displayed below the text, with a small photo pin placed on it. A red arrow points from the text 'first map image' to the map area.</p>
<p><b>5[pre]</b> The computer-implemented method of claim 1,</p>	<p><i>See</i> information for claim 1.</p>
<p><b>5[a]</b> wherein the plurality of selectable elements further includes a</p>	<p>The plurality of selectable elements in the application view (<i>see</i> limitation 1[a]) includes a people selectable element, as shown below.</p>

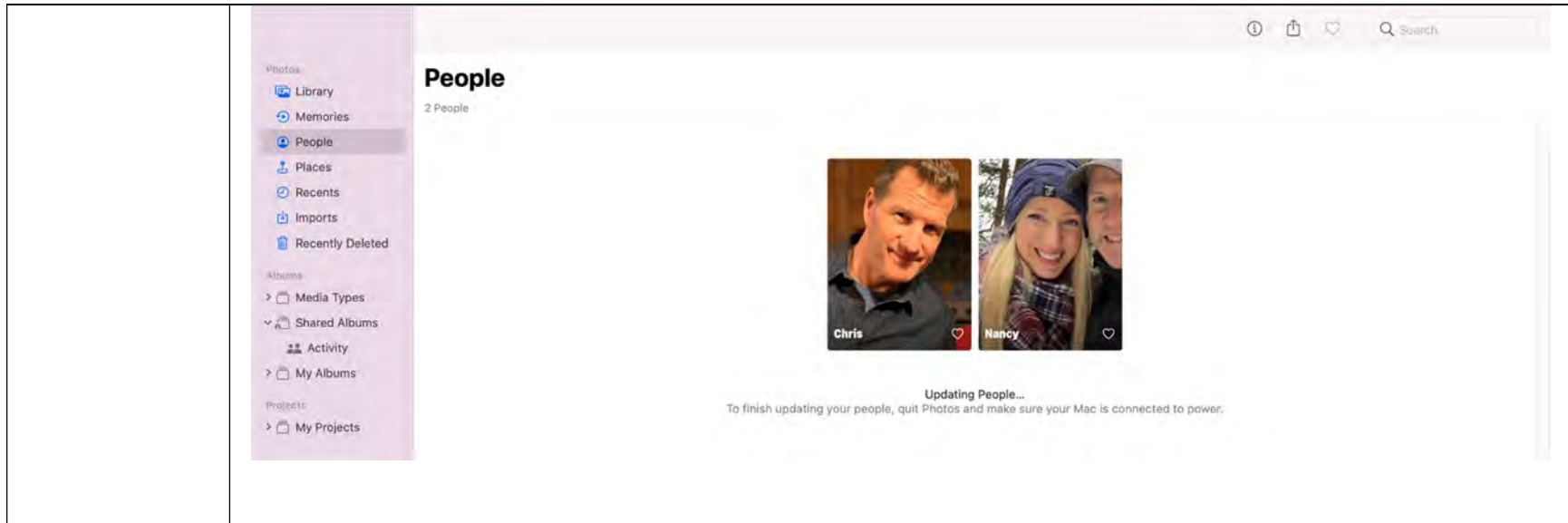


people selectable element,



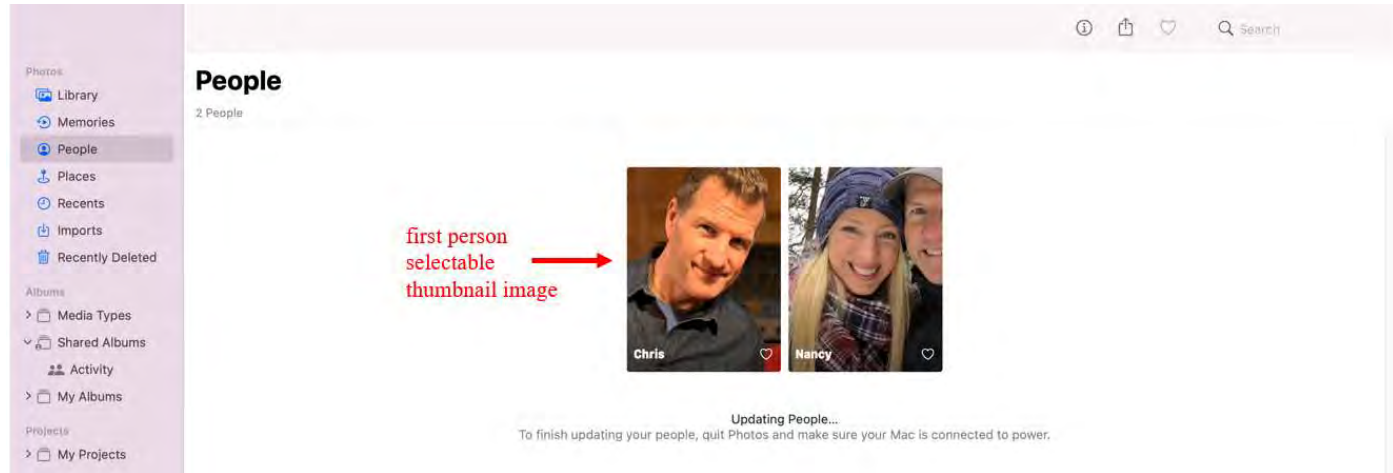
**5[b]** the method further comprising responsive to a click or tap of the people selectable element, displaying a people view, the displaying the people view including displaying:

A people view is displayed responsive to clicking the people selectable element.

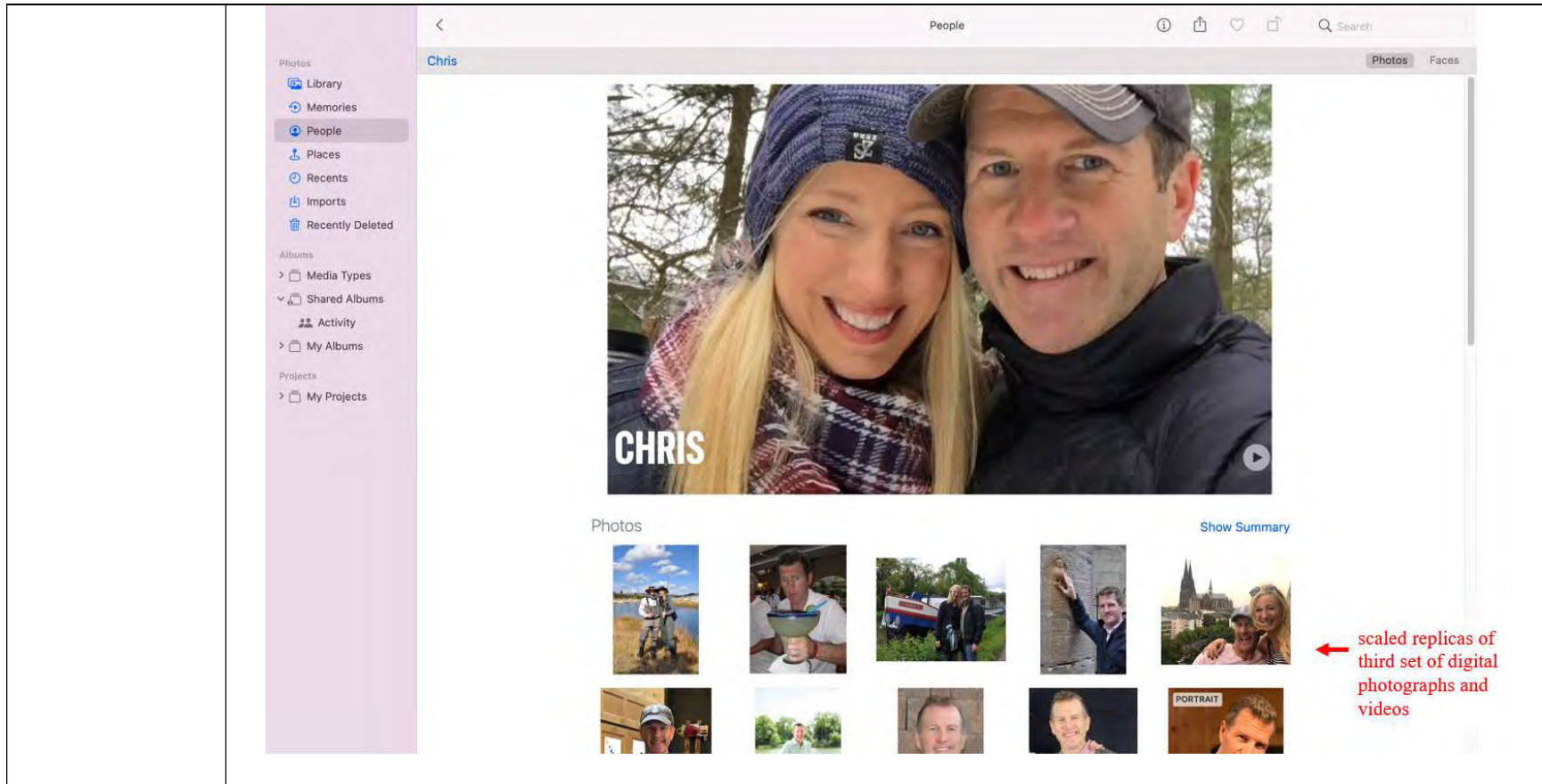


**5[c]** (i) a first person selectable thumbnail image including an image of a face of a first person, a third set of digital photographs and videos including digital photographs and videos associated with the first person;

The people view includes a first person selectable thumbnail image including an image of a face of a first person:

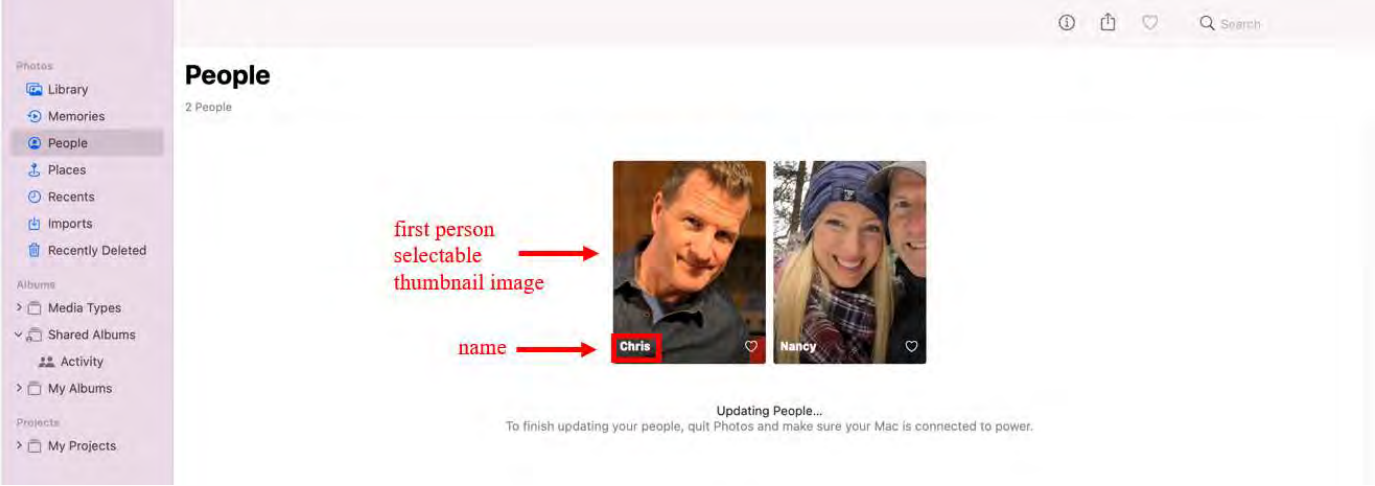


As shown, the first person selectable thumbnail image is associated with a third set of digital photographs and videos:

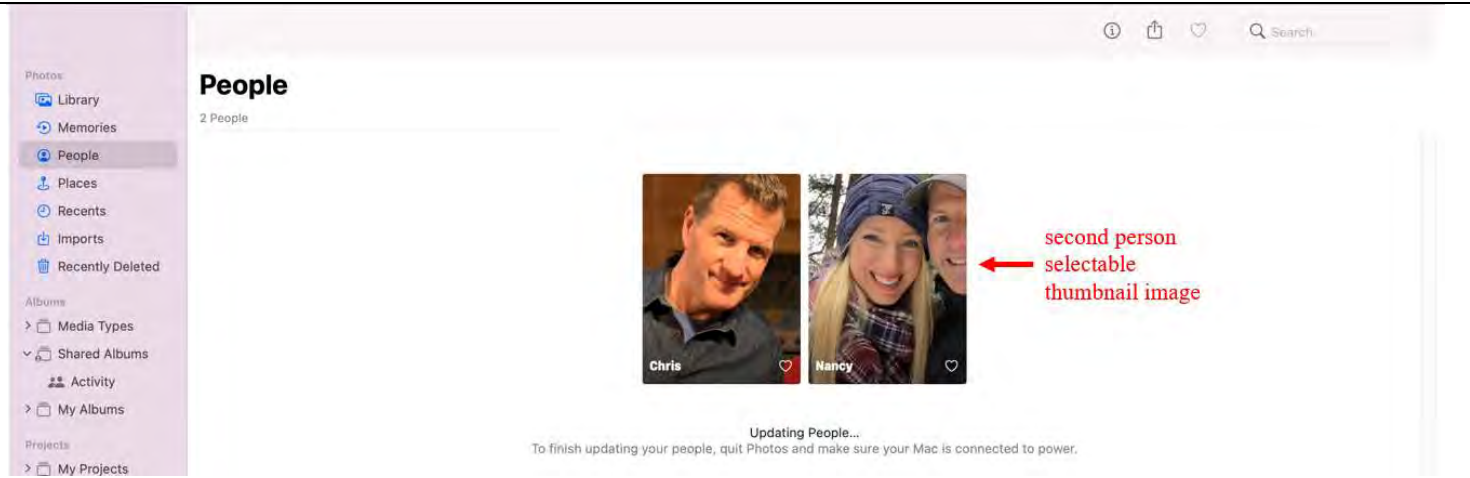


**5[d]** (ii) a name associated with the first person, the name associated with the first person being displayed adjacent to the first person selectable

A name associated with the first person is displayed adjacent to the first person selectable thumbnail image, as shown below:

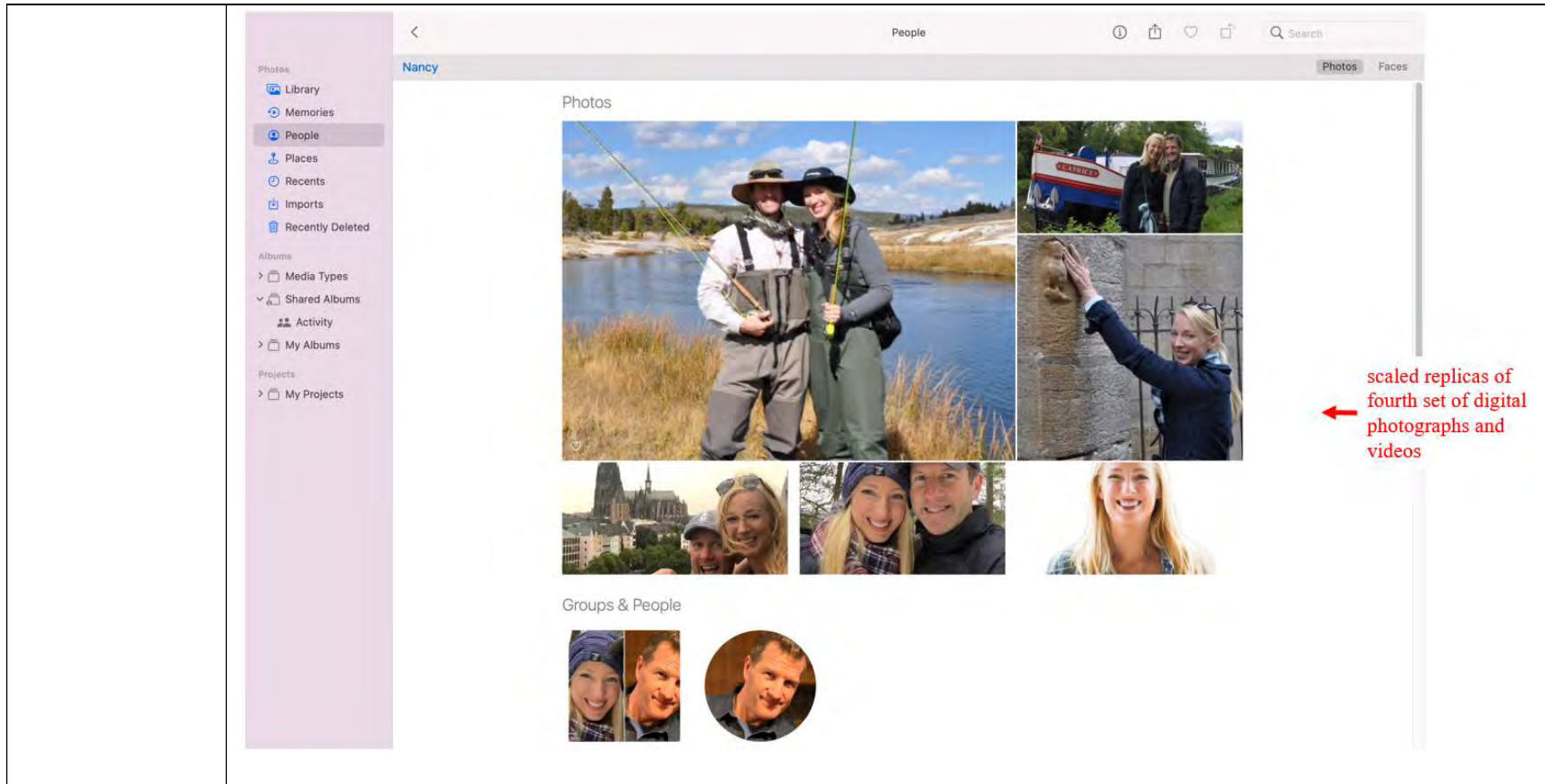
<p>thumbnail image;</p>	 <p>To the extent it is found that the name associated with the first person is not literally displayed adjacent to the first person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the name associated with the first person is to communicate the name of the first person that is associated with the first person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the name associated with the first person in sufficient proximity to the first person selectable thumbnail image such that a user will associate the name associated with the first person with the first person selectable thumbnail image. The result of the claimed displaying is that the name associated with the first person is associated with the first person selectable thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p>5[e] (iii) a second person selectable thumbnail image including an image of a face of a second person, a fourth set of digital</p>	<p>The people view includes a second person selectable thumbnail image including an image of a face of a second person:</p>

photographs and videos including digital photographs and videos associated with the second person; and



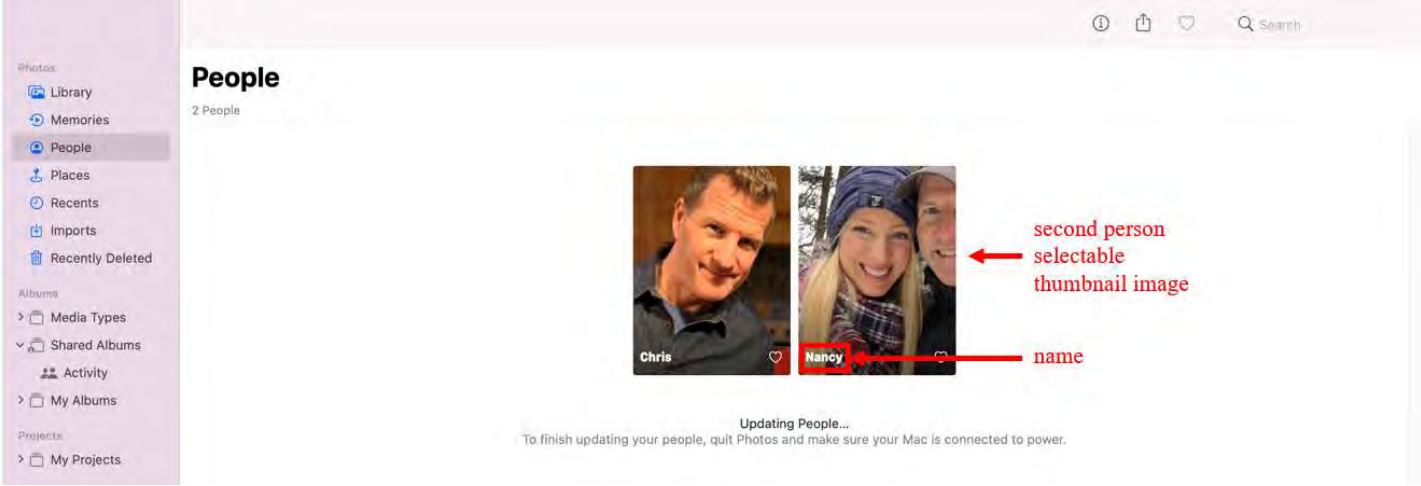
As shown, the second person selectable thumbnail image is associated with a fourth set of digital photographs and videos:





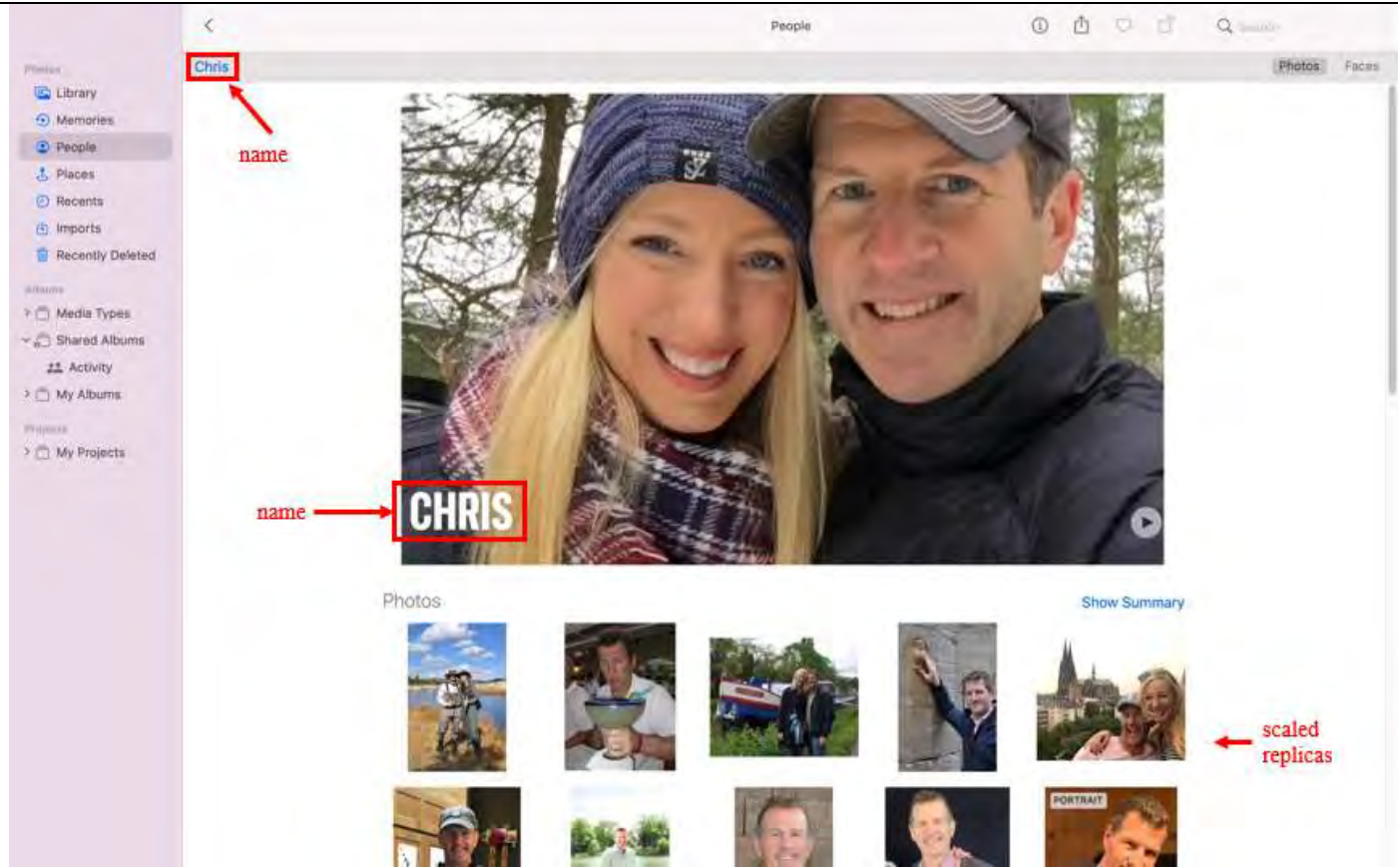
**5[f]** (iv) a name associated with the second person, the name associated with the second person being displayed adjacent to the second person selectable

macOS displays a name associated with the second person adjacent to the second person selectable thumbnail image, as shown below:

<p>thumbnail image.</p>	 <p>To the extent it is found that the name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the name associated with the second person is to communicate the name of the second person that is associated with the second person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the name associated with the second person in sufficient proximity to the second person selectable thumbnail image such that a user will associate the name associated with the second person with the second person selectable thumbnail image. The result of the claimed displaying is that the name associated with the second person is associated with the second person selectable thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p>7. The computer-implemented method of claim 5, further comprising responsive to a click or tap of</p>	<p>macOS displays a first person view responsive to a click or tap of the first person selectable thumbnail image. As shown, the first person view includes the name associated with the first person and a scaled replica of the photos and videos in the third set of digital photographs.</p>

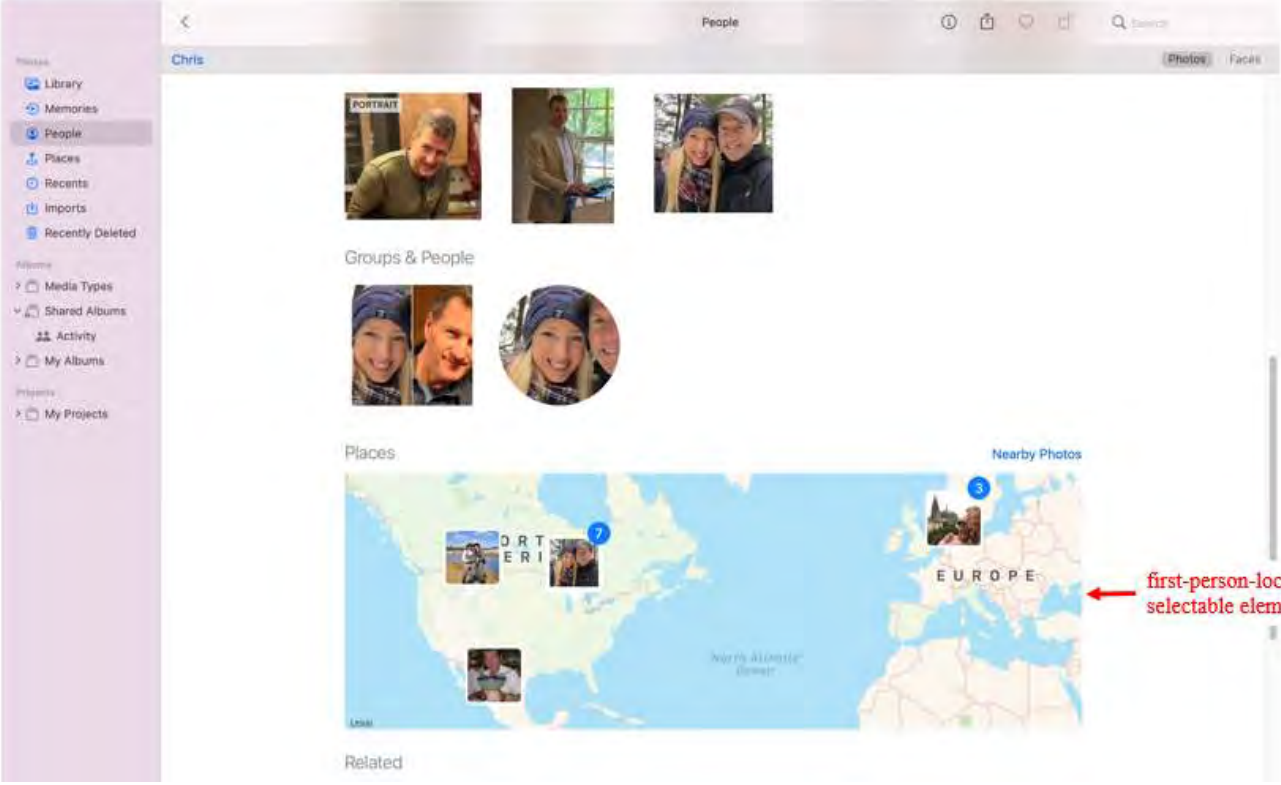


the first person selectable thumbnail image, displaying a first person view, the displaying the first person view including displaying (i) the name associated with the first person and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs.

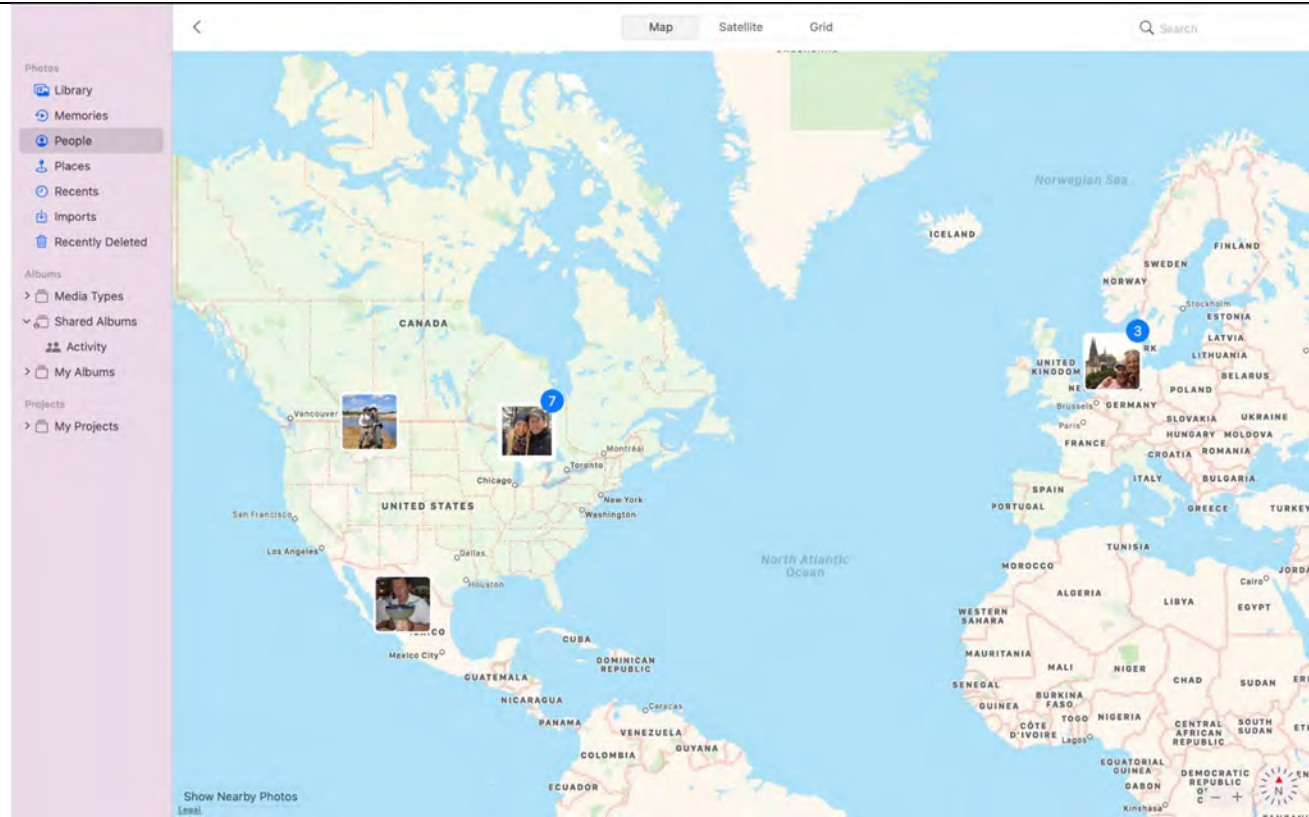


8. The computer-implemented method of claim 7, wherein the displaying the first person view further includes displaying a

As shown below, the first person view includes a first-person-location selectable element below the scaled replicas.

<p>first-person-location selectable element.</p>	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with categories like Library, Memories, People, Places, Recents, Imports, and Recently Deleted. The main area is titled 'People' and shows a profile for 'Chris'. Below the profile are sections for 'Groups &amp; People', 'Places', and 'Nearby Photos'. The 'Places' section features a map of North America and Europe. A red arrow points to a location marker on the European continent labeled 'EUROPE', which is identified as a 'first-person-location selectable element'.</p>
<p>9. The computer-implemented method of claim 8, further comprising responsive to a click or tap of the first-person-location selectable</p>	<p>macOS displays a representation of locations having a digital photograph or video associated with the first person to be displayed responsive to a click or tap of the first-person-location selectable element.</p>

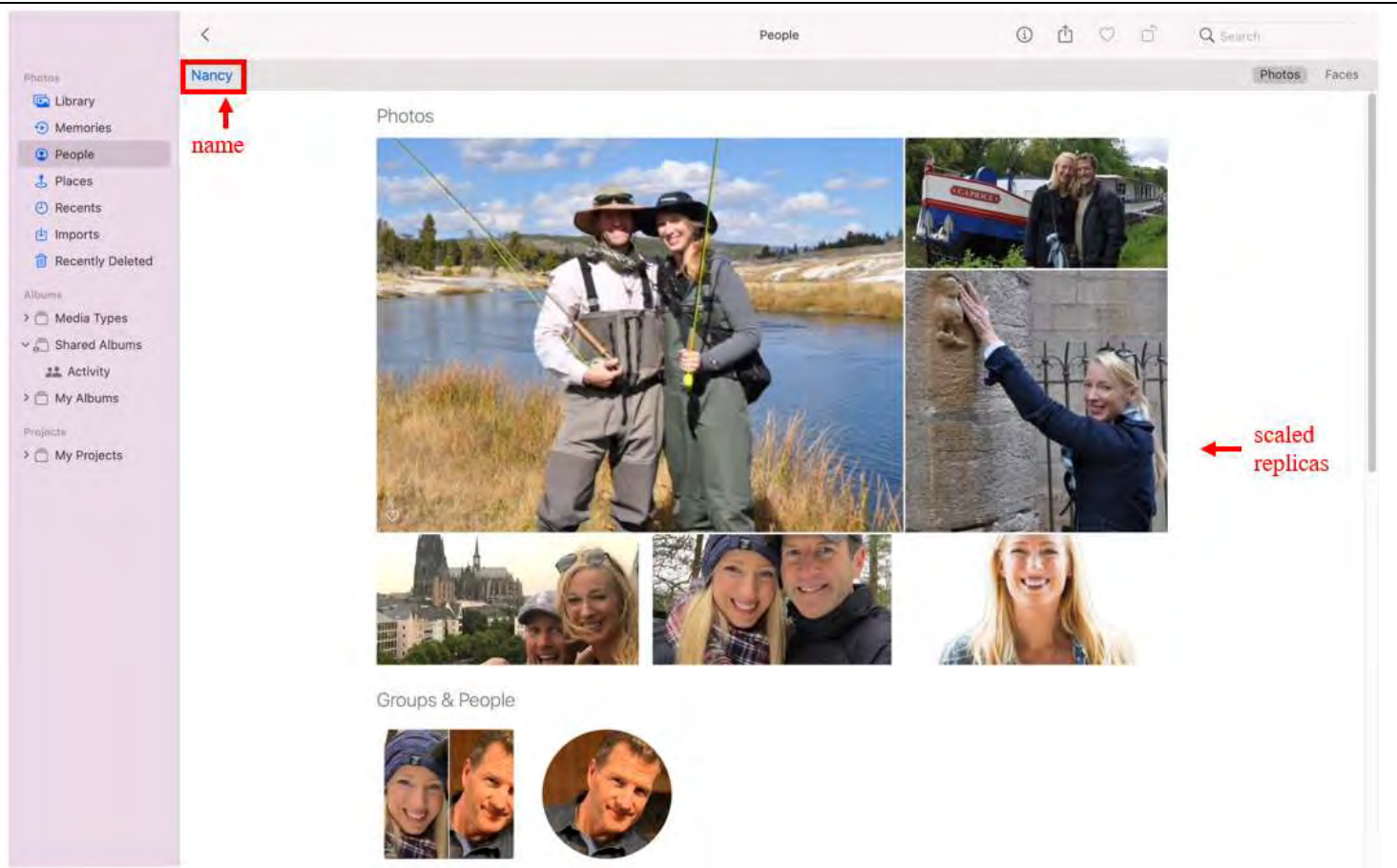
element, displaying a representation of all locations having a digital photograph or video associated with the first person.



**10.** The computer-implemented method of claim 7, further comprising responsive to a click or tap of the second person

macOS displays a second person view responsive to a click or tap of the second person selectable thumbnail image. As shown, the second person view includes the name associated with the second person and a scaled replica of the photos and videos in the fourth set of digital photographs.

selectable thumbnail image, displaying a second person view, the displaying the second person view including displaying (i) the name associated with the second person and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs.

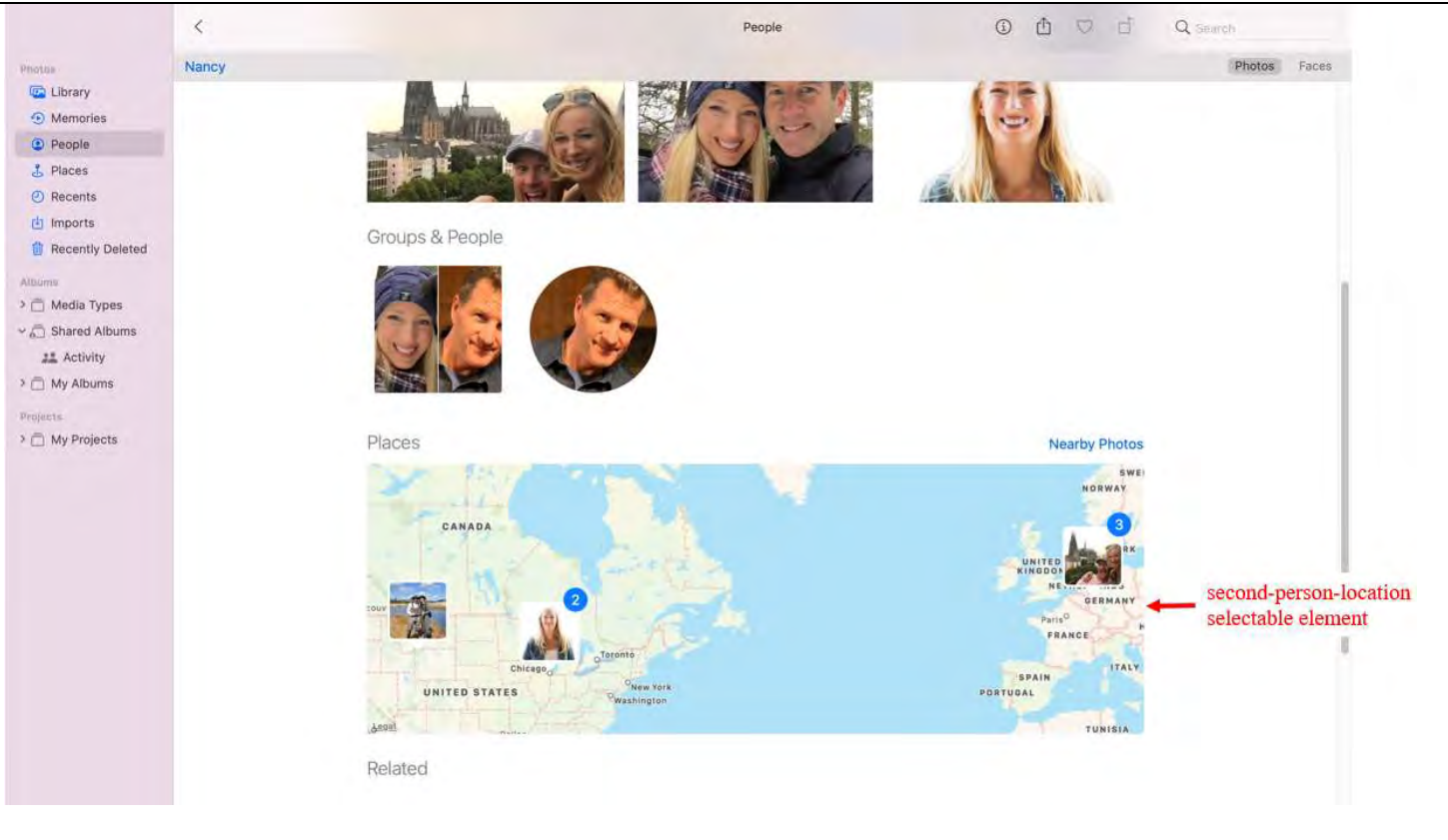


11. The computer-implemented method of claim 10, wherein the displaying the second person view further

As shown below, the second person view includes a second-person-location selectable element below the scaled replicas.



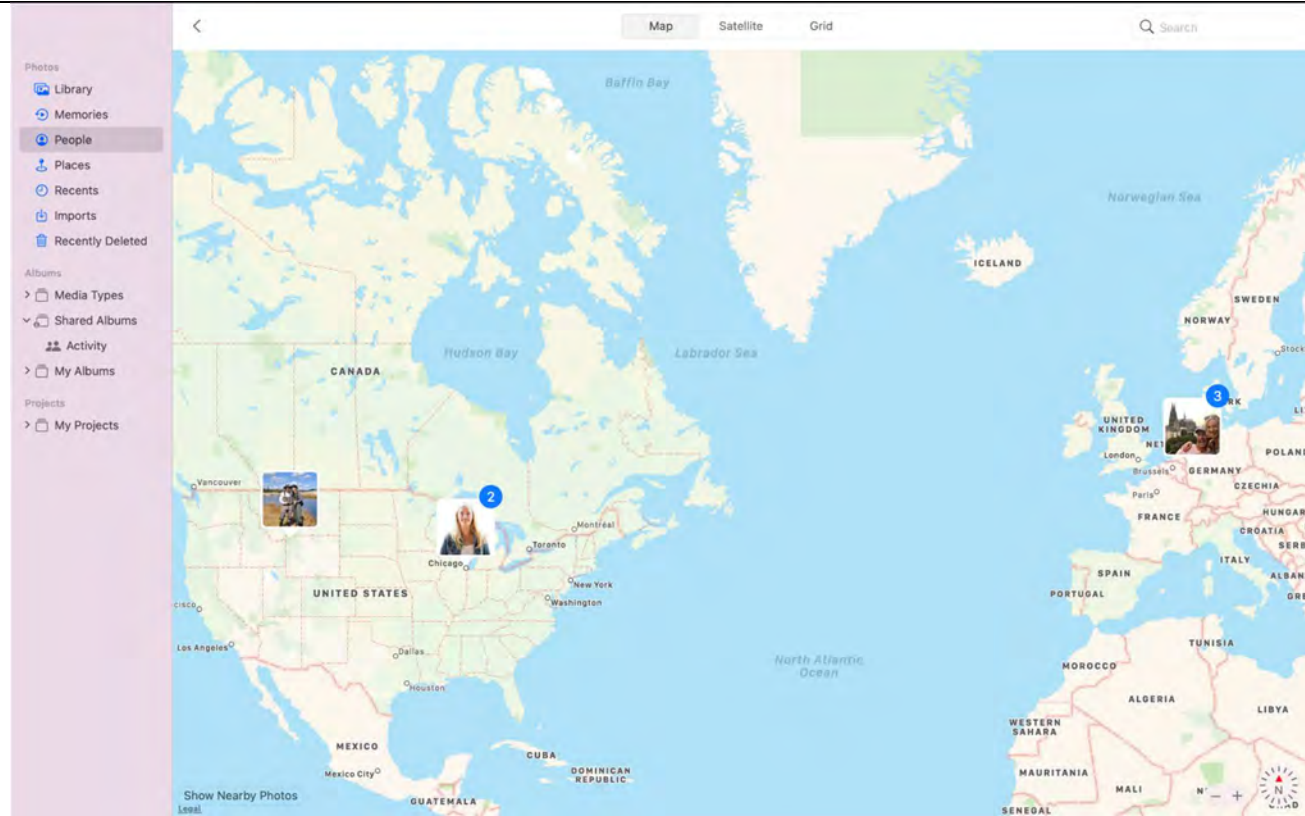
includes displaying a second-person-location selectable element.



**12.** The computer-implemented method of claim 11, further comprising responsive to a click or tap of the second-person-location selectable

macOS displays a representation of all locations having a digital photograph or video associated with the second person responsive to a click or tap of the second-person-location selectable element.

element, displaying a representation of all locations having a digital photograph or video associated with the second person.



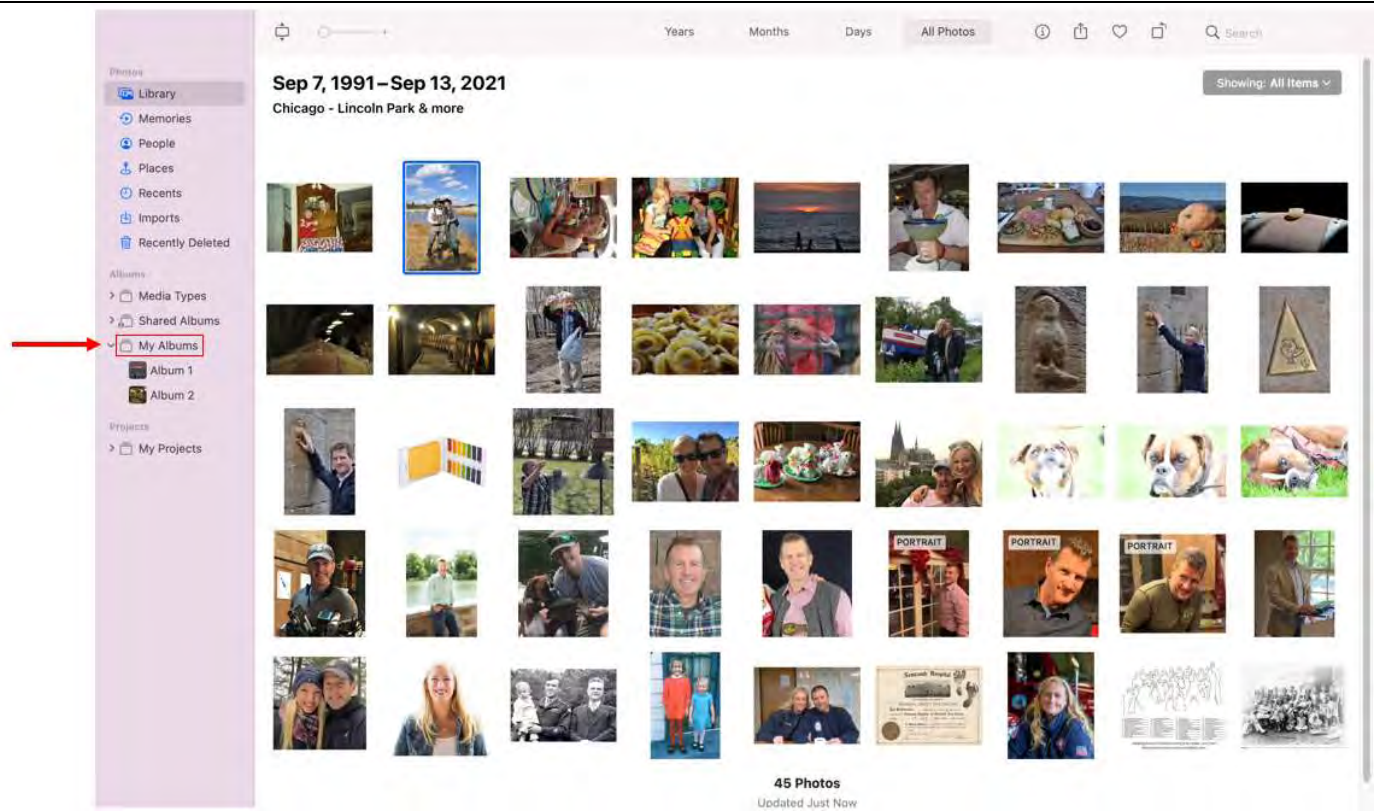
**13[pre]** The computer-implemented method of claim 1,

*See information for claim 1.*

**13[a]** wherein the plurality of selectable elements further includes an

The plurality of selectable elements (*see* limitation 1[a]) further includes an album selectable element.

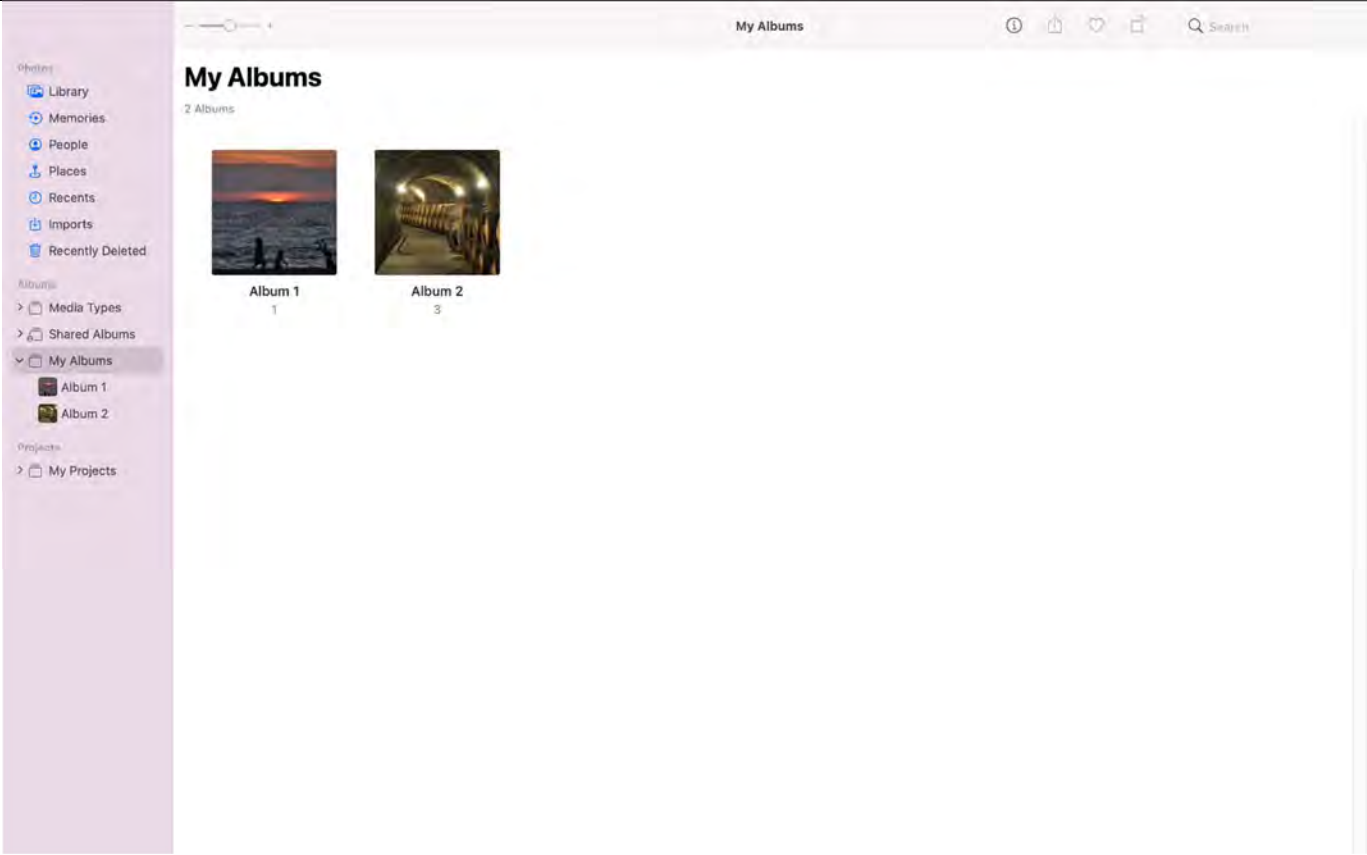
album selectable element,



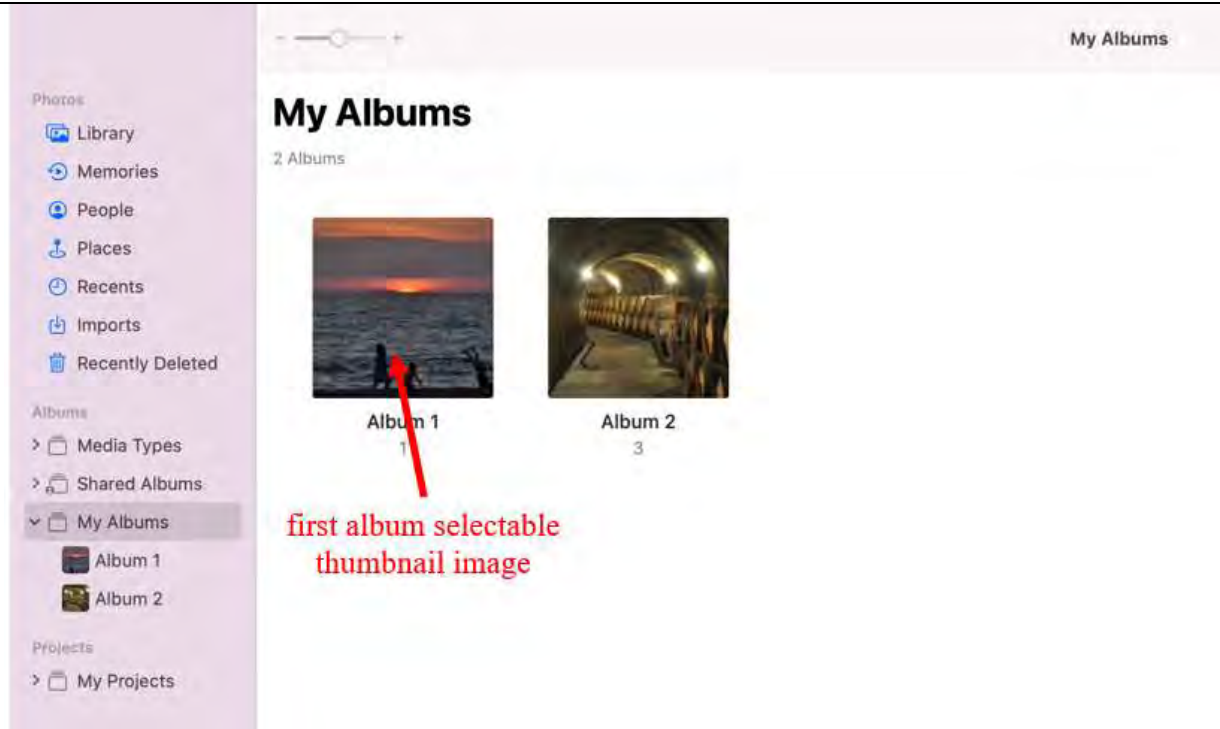
**13[b]** the method further comprising responsive to a click or tap of the album selectable element, displaying an album view, the displaying the album view

macOS displays an album view responsive to a click or tap of the album selectable element.

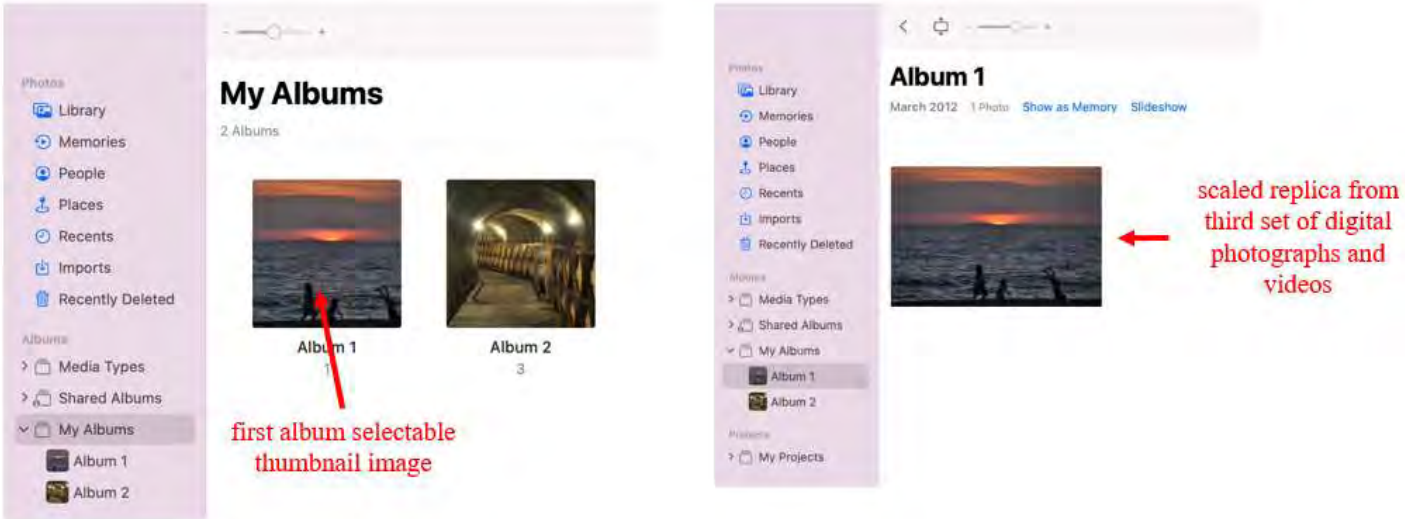


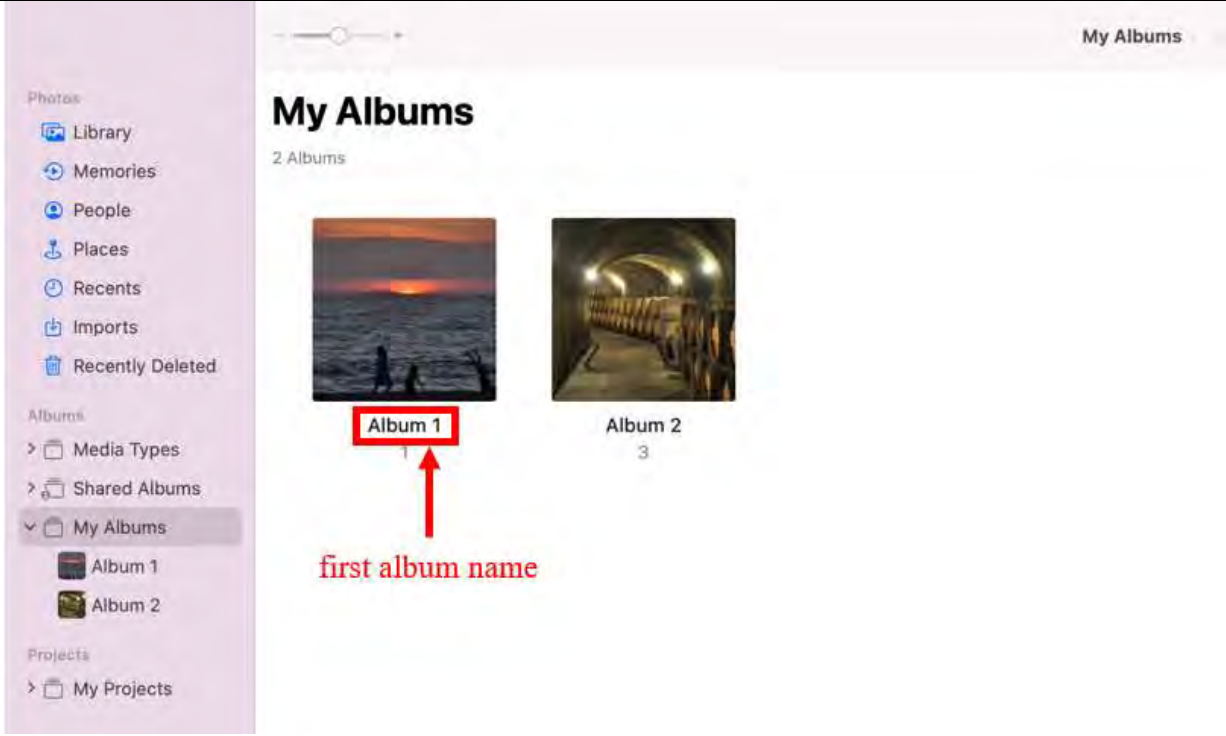
<p>including displaying:</p>	
<p><b>13[c][i]</b> (i) a first album selectable thumbnail image including a scaled representation of at least one digital photograph in a</p>	<p>The album view includes a first album selectable thumbnail image.</p>

third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag;

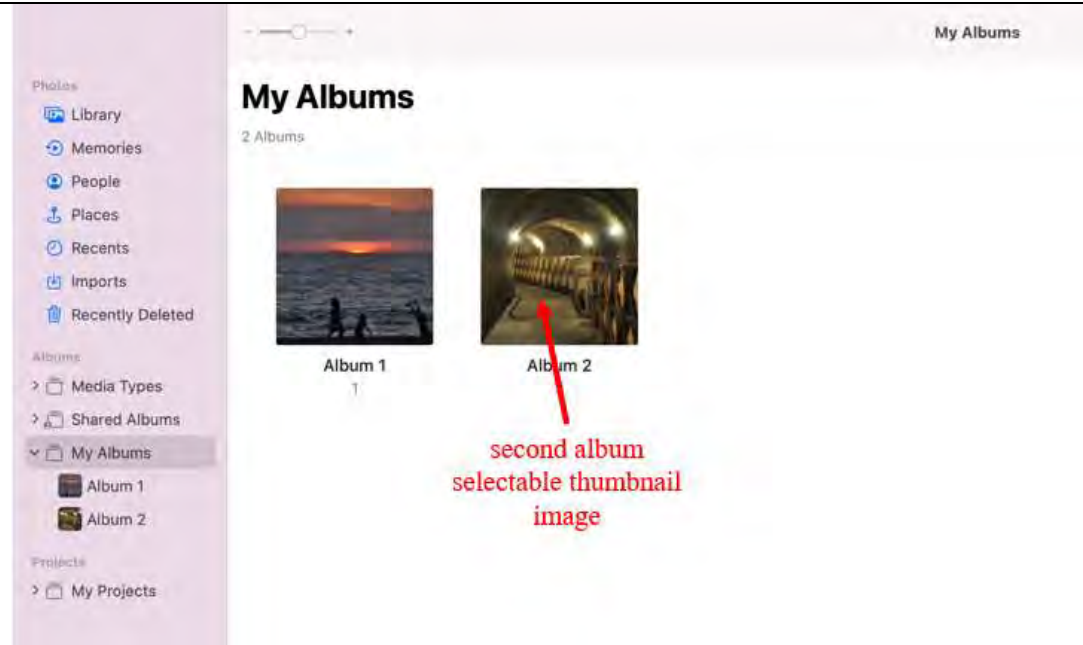


The first album selectable thumbnail includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag.

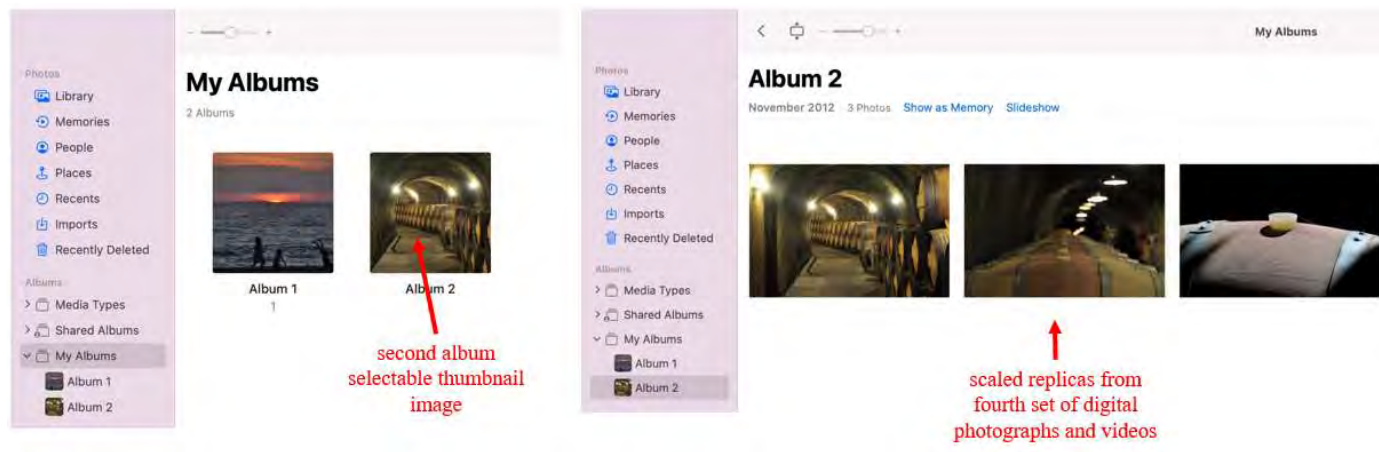
	 <p>first album selectable thumbnail image</p> <p>scaled replica from third set of digital photographs and videos</p>
<p><b>13[c][iii]</b> (ii) a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image;</p>	<p>The album view also includes a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image.</p>

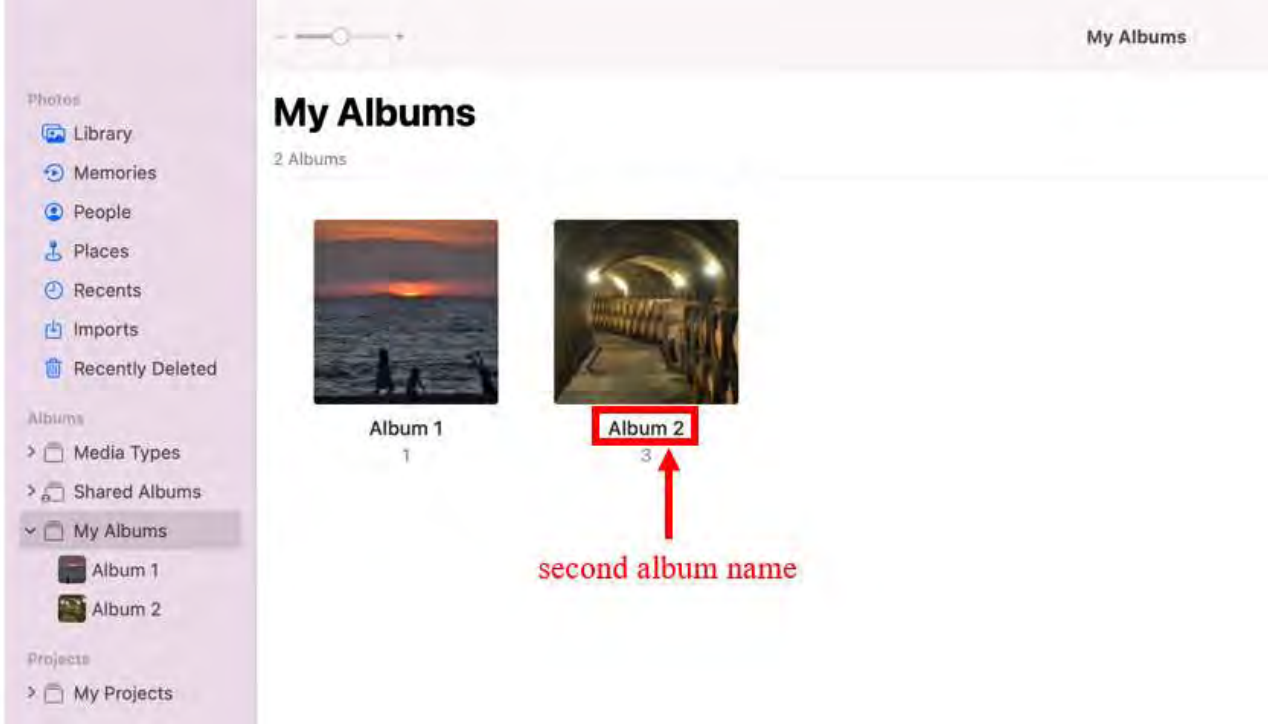
	
<p><b>13[c][iii]</b> (iii) a second album selectable thumbnail image including a scaled representation of at least one digital photograph in a fourth set of digital photographs and videos that</p>	<p>The album view includes a second album selectable thumbnail image.</p>

includes all of the digital photographs and videos associated with a second album tag; and



The second album selectable thumbnail image includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag.

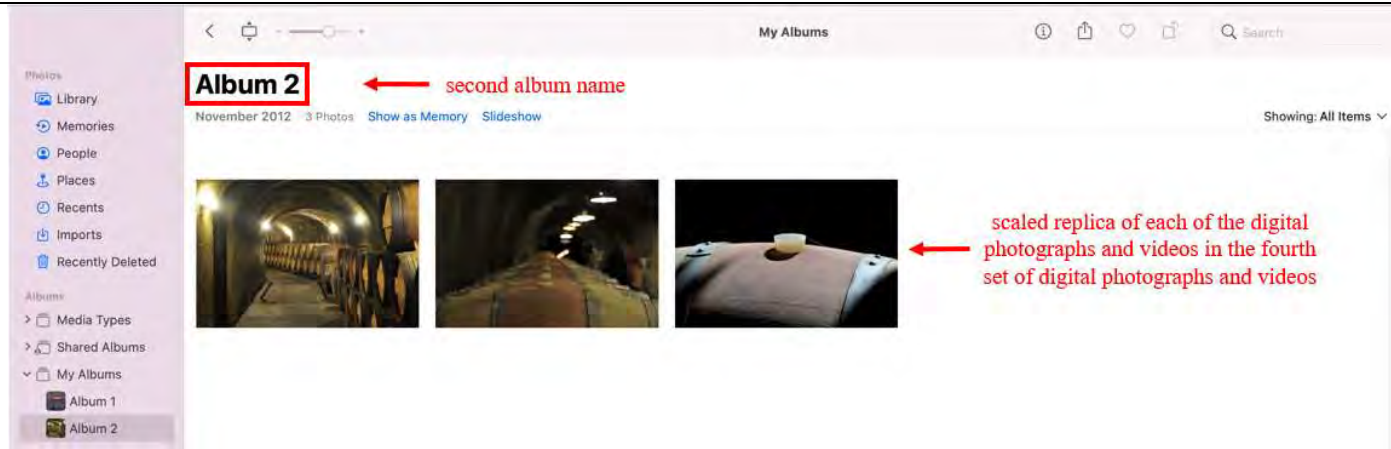


<p><b>13[c][iv]</b> (ii) a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p>	<p>The album view also includes a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p>  <p>The screenshot shows the 'My Albums' section of the Photos app. On the left is a sidebar with navigation options like Library, Memories, People, Places, Recents, Imports, Recently Deleted, Media Types, Shared Albums, My Albums (expanded to show Album 1 and Album 2), and My Projects. The main area displays two album thumbnails. The first is 'Album 1' with a sunset image and a count of 1. The second is 'Album 2' with a tunnel image and a count of 3. A red box highlights the text 'Album 2' below the second thumbnail, and a red arrow points from this box to the text 'second album name' written in red below the arrow.</p>
<p><b>14.</b> The computer-implemented method of claim 13, further comprising responsive to a click or tap of the first album</p>	<p><i>See</i> information for claim 13. Additionally, macOS displays a first album view responsive to a click or tap of the first album selectable thumbnail image. The first album view includes the first album name associated with the first album and a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos.</p>

<p>selectable thumbnail image, displaying a first album view, the displaying the first album view including displaying (i) the first album name associated with the first album and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos.</p>	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with navigation options like Library, Memories, People, Places, Recents, Imports, Recently Deleted, and Albums. The main area displays an album titled 'Album 1' with a date of 'March 2012' and '1 Photo'. Below the album title is a large thumbnail image of a sunset over water. Red arrows and text annotations point to the album name and the thumbnail image.</p>
<p><b>15.</b> The computer-implemented method of claim 14, further comprising responsive to a click or tap of the second album selectable thumbnail</p>	<p><i>See</i> information for claim 14. Additionally, macOS displays a second album view responsive to a click or tap of the second album selectable thumbnail image. The second album view includes the second album name associated with the second album and a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs and videos.</p>



image, displaying a second album view, the displaying the second album view including displaying (i) the second album name associated with the second album and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs and videos.

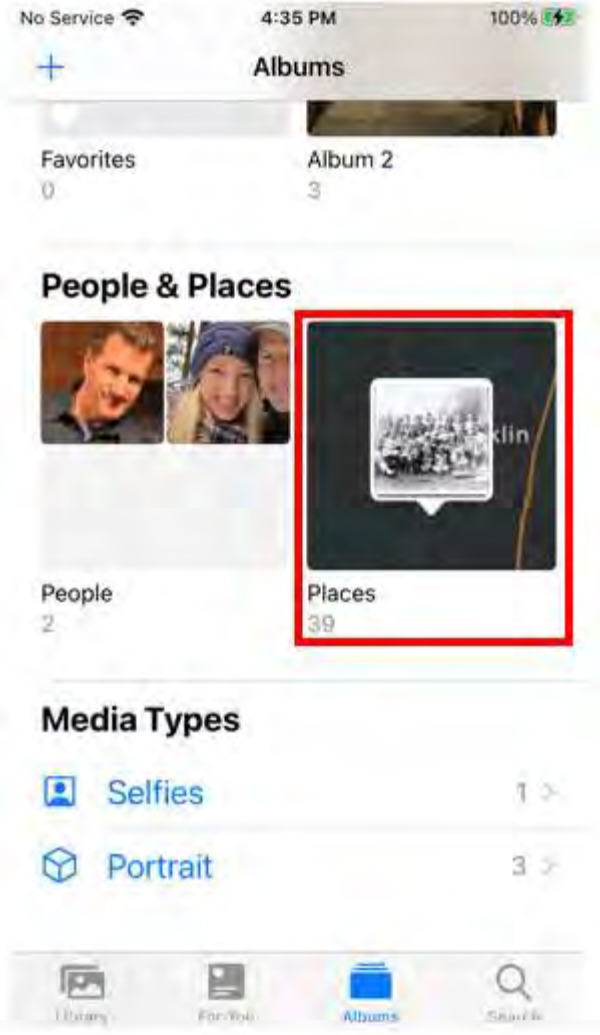


# **Exhibit C.1**

**U.S. Patent No. 10,621,228 – Infringement Claim Chart**

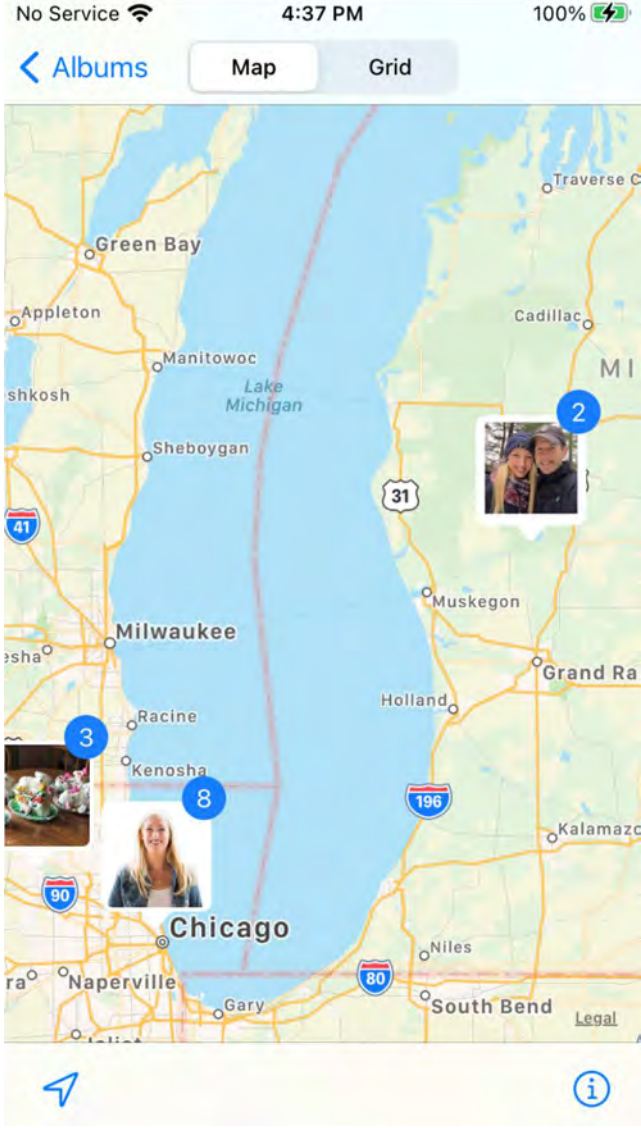
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,621,228 (“the ‘228 patent”) in Apple iOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPhone 7 running iOS 14.7.1. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<b>1[pre]</b> A method comprising:	To the extent the preamble is limiting, iOS performs a method, as detailed below.
<b>1[a]</b> responsive to a first input, causing a map view to be displayed on an interface, the map view including:	Responsive to a first input (e.g., tapping the “Places” element), iOS displays a map view on an interface.

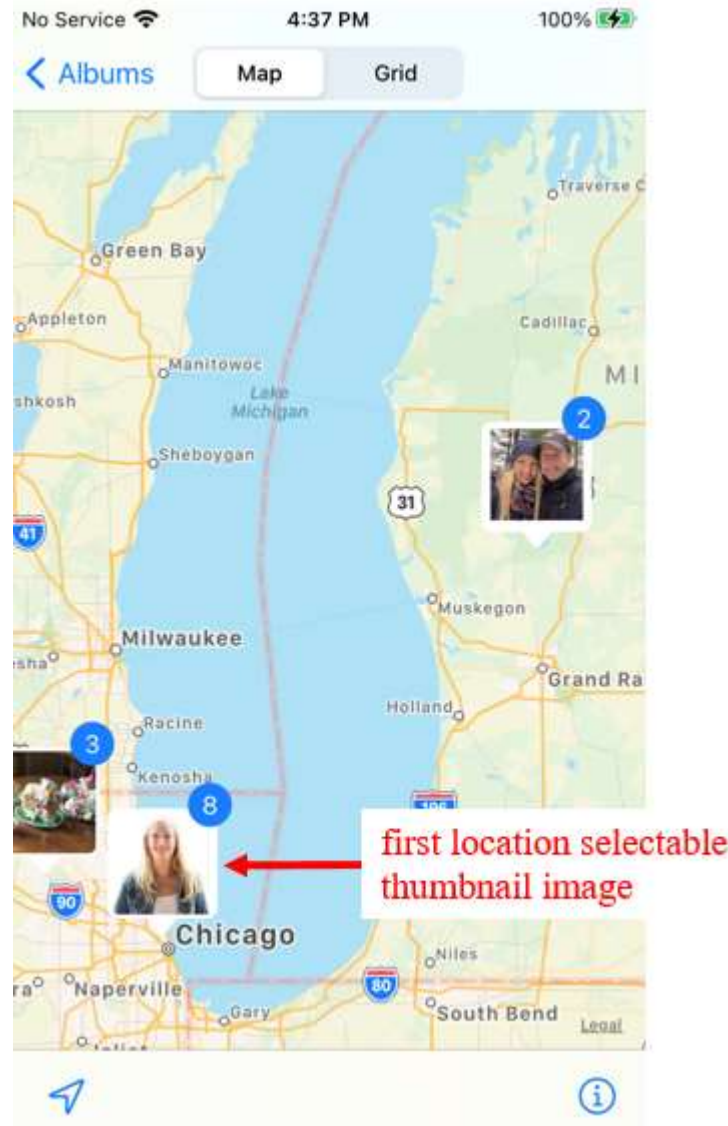
	 <p>The screenshot shows the 'Albums' section of the iOS Photos app. At the top, there are sections for 'Favorites' (0 items) and 'Album 2' (3 items). Below that is the 'People &amp; Places' section, which includes 'People' (2 items) and 'Places' (39 items). The 'Places' album is highlighted with a red rectangular box. Underneath, there is a 'Media Types' section with 'Selfies' (1 item) and 'Portrait' (3 items). The bottom navigation bar shows 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>1[a][i]</b> (i) an interactive map;</p>	<p>The map view includes an interactive map. The map is interactive at least because iOS can zoom in and out.</p>



A zoomed in view is shown below.

	 <p>The screenshot shows the 'Albums' view of the Maps app. At the top, there are status indicators: 'No Service', '4:37 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Albums', 'Map', and 'Grid'. The main area is a map of the Lake Michigan region, showing cities like Green Bay, Appleton, Milwaukee, Chicago, and Grand Rapids. Several location markers are visible, each with a blue circular number and a small thumbnail image. Marker '2' is near Cadillac, MI, with a photo of two people. Marker '3' is near Racine, with a photo of a basket of flowers. Marker '8' is near Kenosha, with a photo of a woman. Marker '90' is near Chicago, with a photo of a woman. The map also shows major highways like I-41, I-31, I-196, I-90, and I-80.</p>
<p><b>1[a][ii]</b> (ii) a first location selectable thumbnail image at a</p>	<p>The map view includes a first location selectable thumbnail image at a first location on the interactive map.</p>

first location on the interactive map; and

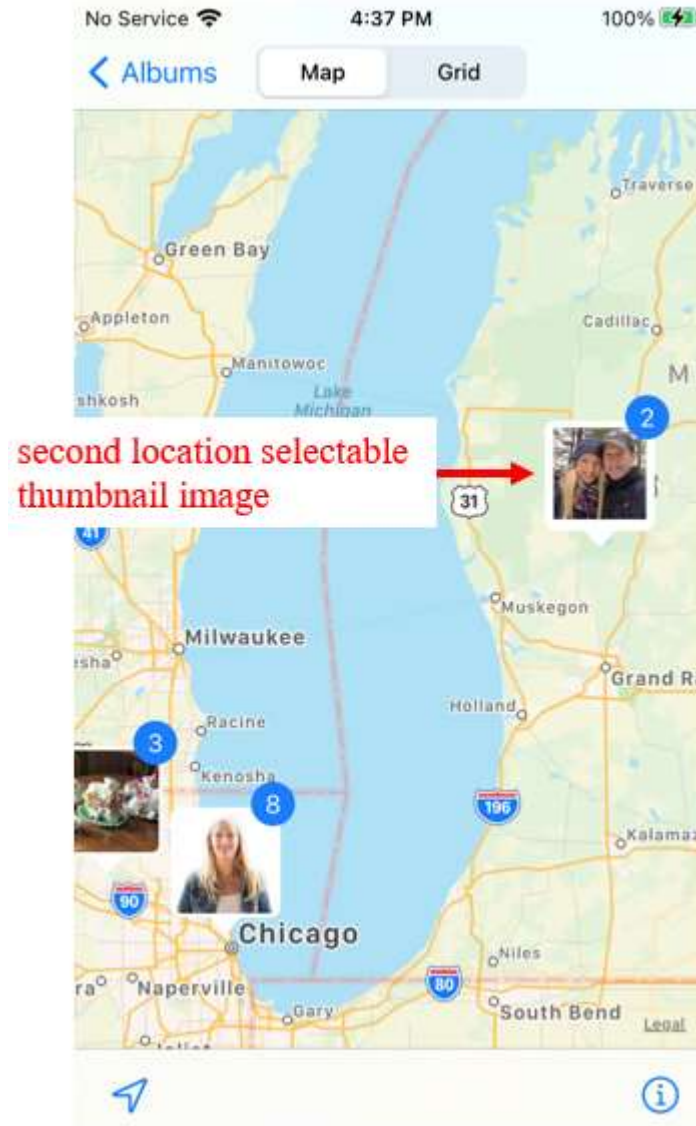


**1[a][iii]** (iii) a second location selectable thumbnail image at a

The map view includes a second location selectable thumbnail image at a second location on the interactive map.



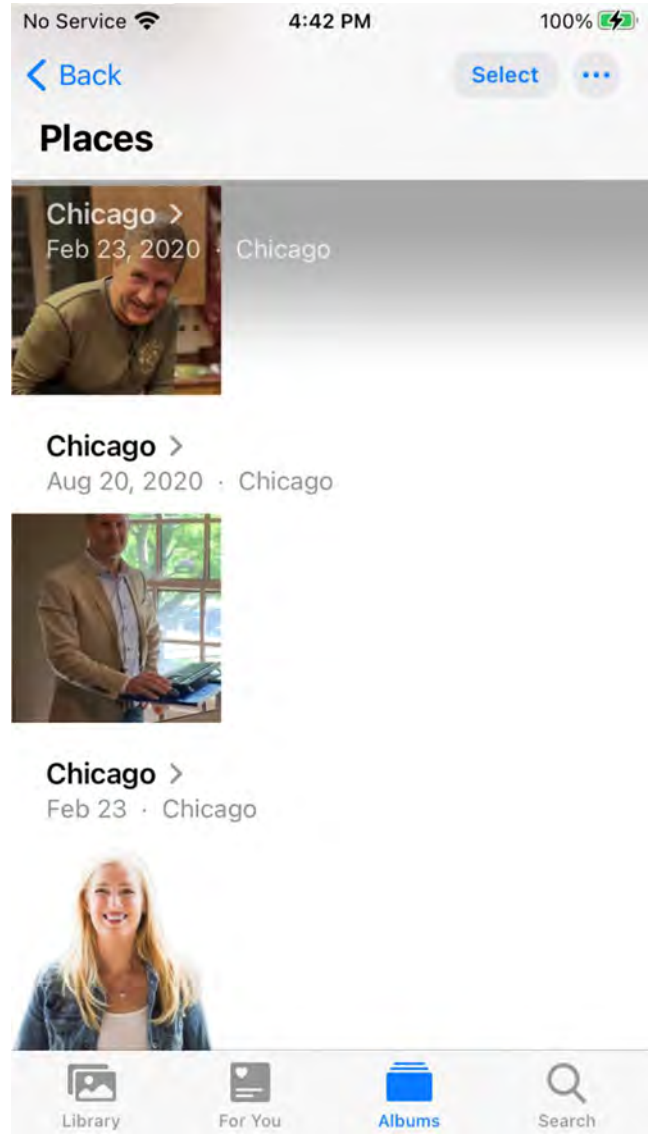
second location on the interactive map;



**1(b)** responsive to an input that is indicative of

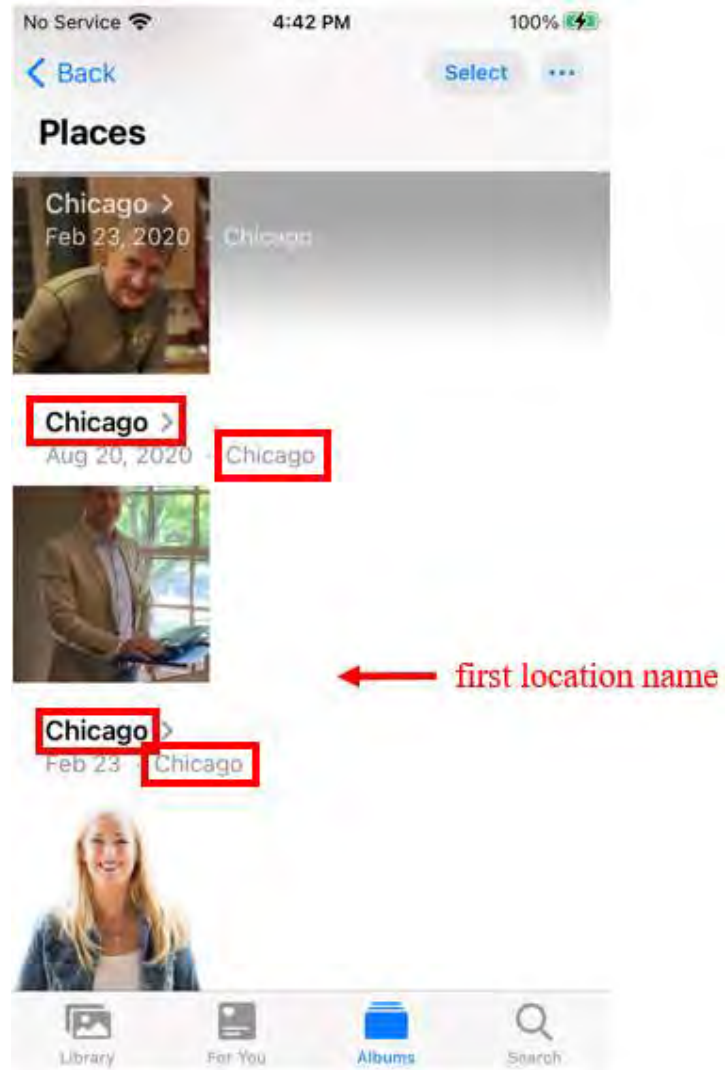
Responsive to an input that is indicative of a selection of the first location selectable thumbnail image, iOS causes a first location view to be displayed on the interface.

a selection of the first location selectable thumbnail image, causing a first location view to be displayed on the interface, the first location view including



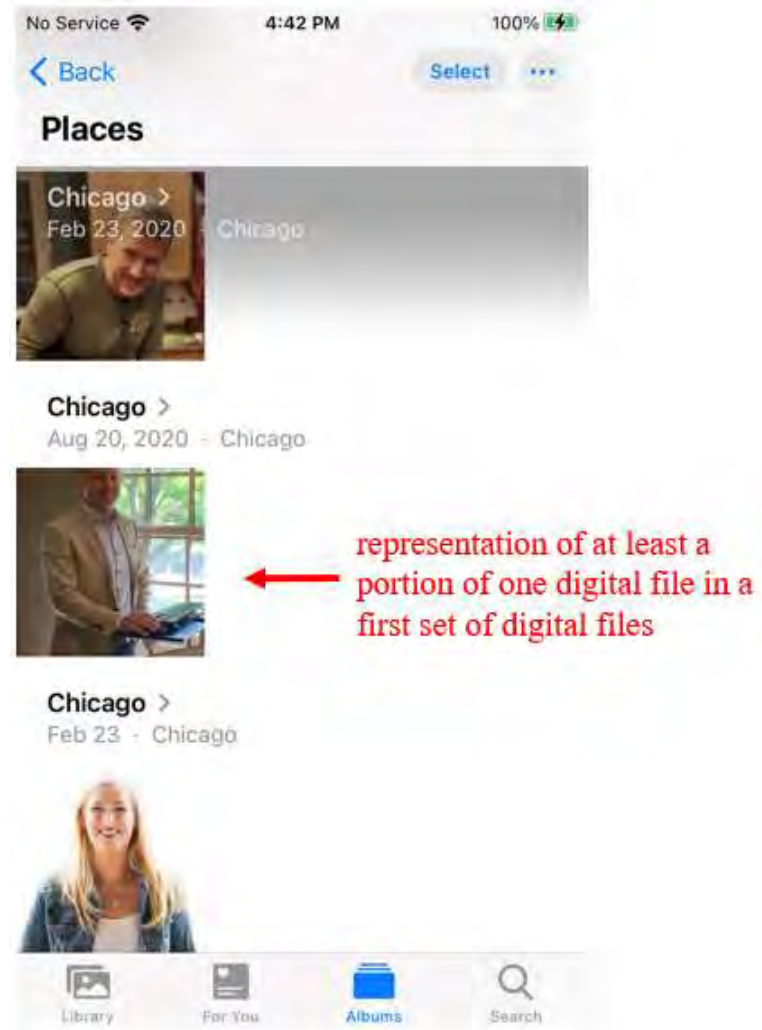
1[b][i] (i) a first location name associated with the first location and

The first location view includes a first location name associated with the first location (in this example, Chicago).

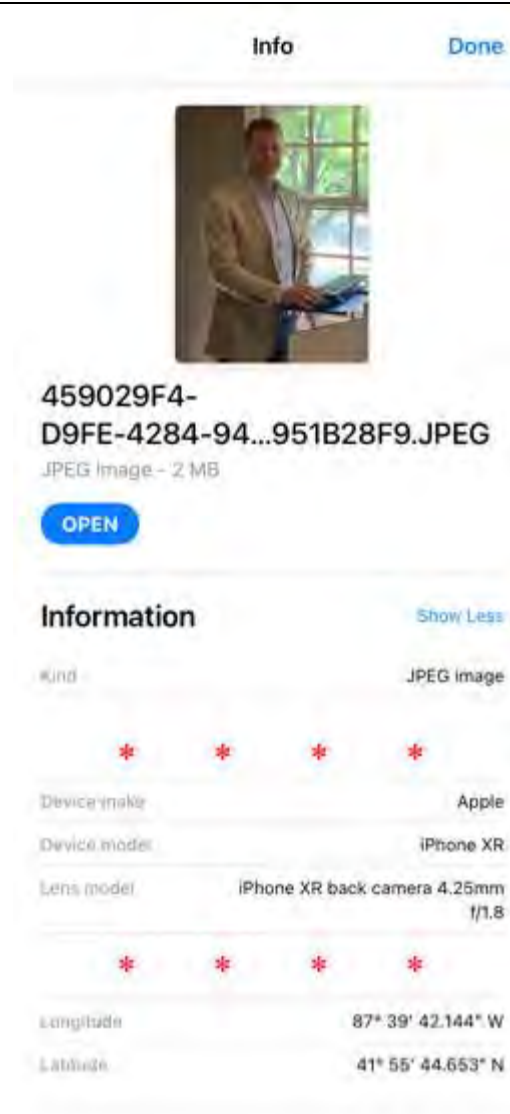


**1[b][ii]** (ii) a representation of at least a portion of one digital file in a first set of digital files, each of the digital files in the first set of digital files being produced from outputs of one or more digital imaging devices, the first set of digital files including digital files associated with the first location;

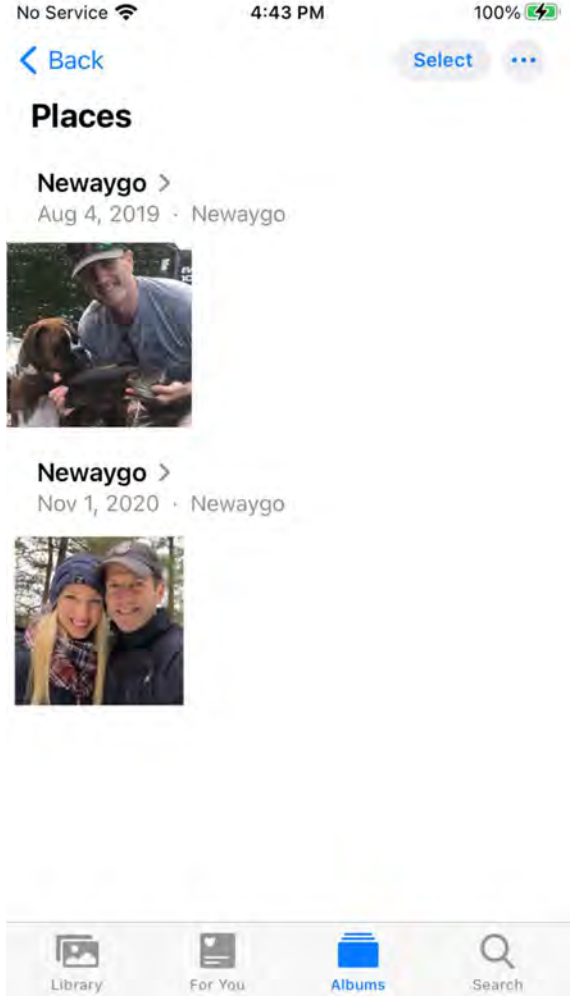
The first location view includes a representation of at least a portion of one digital file in a first set of digital files.



Each of the digital files in the first set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).



In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone XR (a digital imaging device), as shown in the iOS Files application. The first set of digital files includes digital files associated with the first location (in this example, Chicago).

<p><b>1[c]</b> responsive to an input that is indicative of a selection of the second location selectable thumbnail image, causing a second location view to be displayed on the interface, the second location view including</p>	<p>Responsive to an input that is indicative of a selection of the second location selectable thumbnail image, iOS displays a second location view on the interface.</p>  <p>The screenshot shows the 'Places' section of the Photos app. At the top, there is a status bar with 'No Service', '4:43 PM', and '100%' battery. Below the status bar are navigation options: a blue '&lt; Back' button, a blue 'Select' button, and a grey menu icon. The 'Places' section lists two entries for 'Newwaygo'. The first entry is dated 'Aug 4, 2019' and features a photo of a man with a dog. The second entry is dated 'Nov 1, 2020' and features a photo of a man and a woman. At the bottom of the screen is a dock with icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>1[c][i]</b> (i) a second location name associated</p>	<p>The second location view includes a second location name associated with the second location.</p>

with the second location and



1[c][ii] (ii) a representation of at least

The second location view includes a representation of at least a portion of one digital file in a second set of digital files.

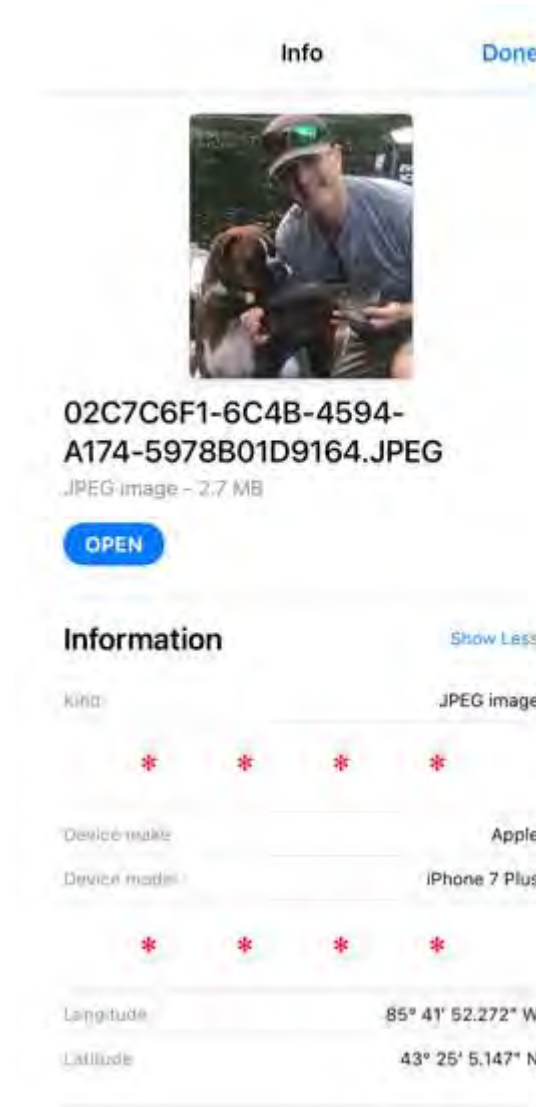


a portion of one digital file in a second set of digital files, each of the digital files in the second set of digital files being produced from outputs of the one or more digital imaging devices, the second set of digital files including digital files associated with the second location; and



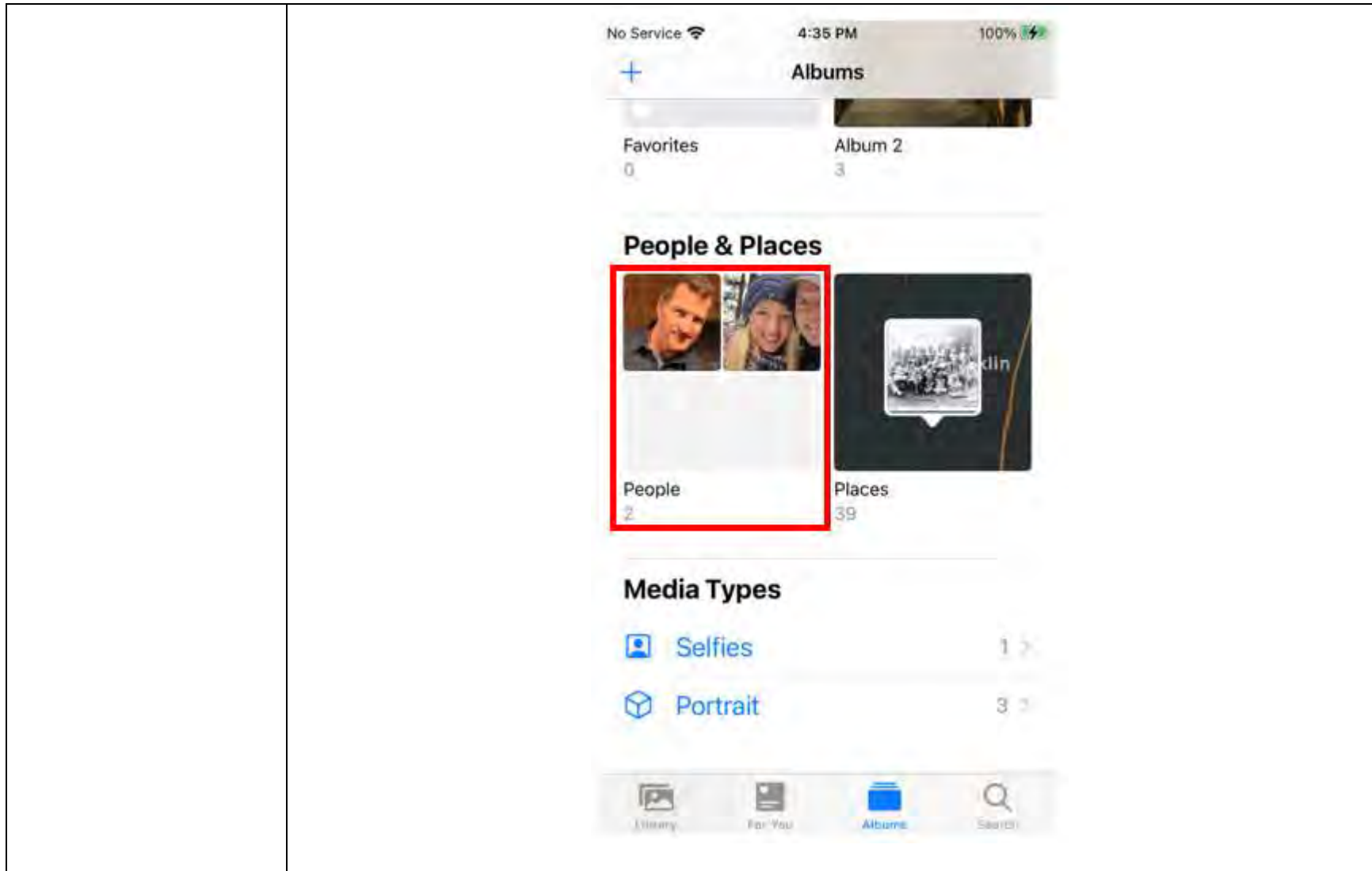
representation of at least a portion of one digital file in a second set of digital files

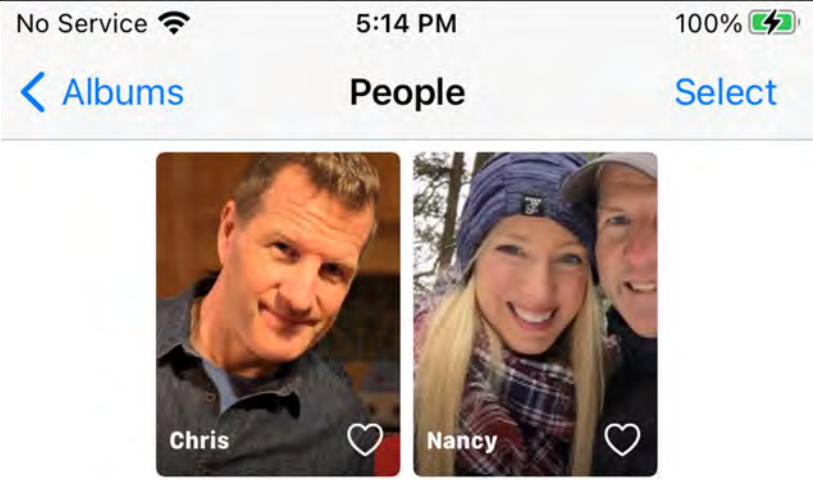
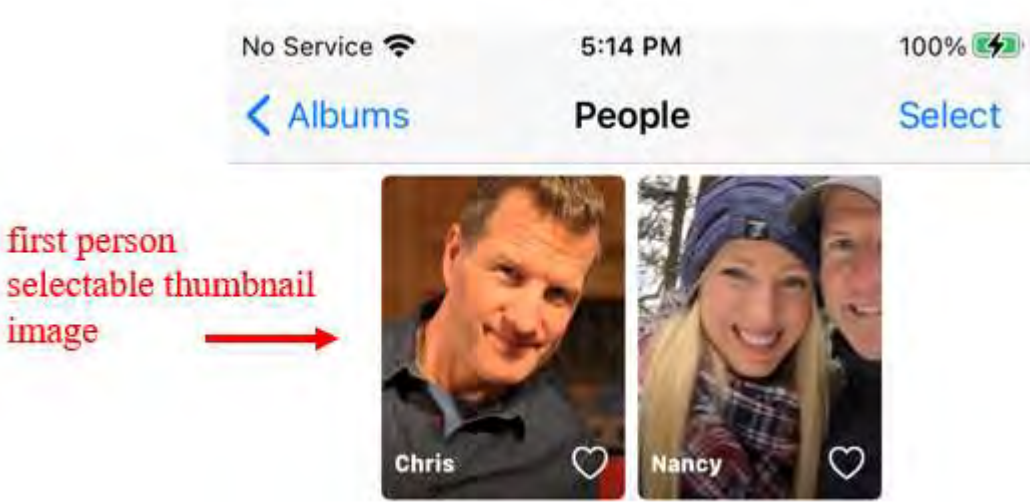
Each of the digital files in the second set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).

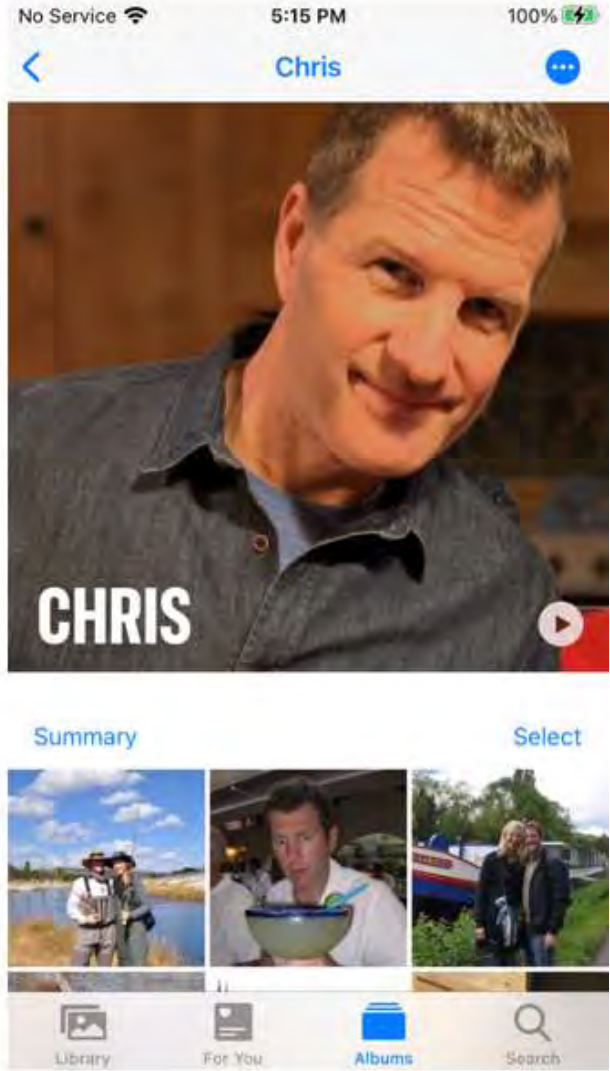


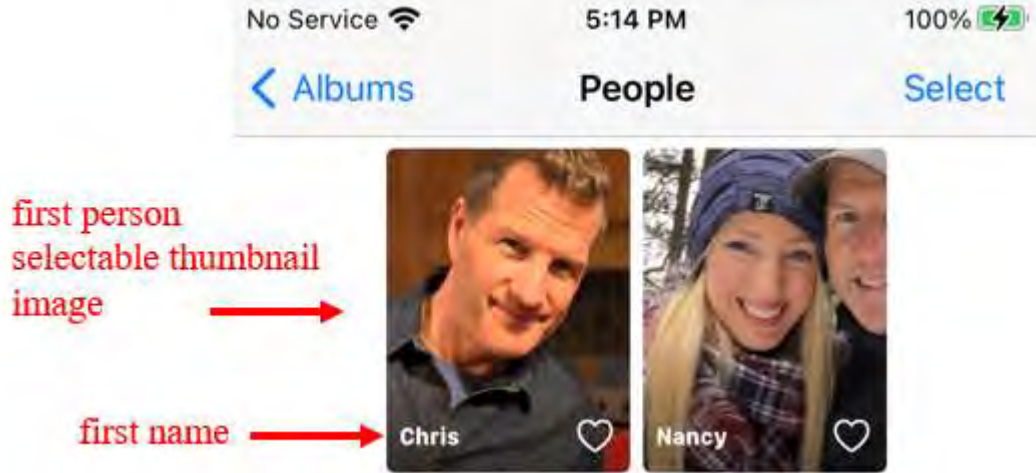
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iOS

	<p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone 7 Plus (a digital imaging device). The second set of digital files includes digital files associated with the second location (in this example, Newaygo).</p>
<p><b>1[d]</b> responsive to a second input that is subsequent to the first input, causing a people view to be displayed on the interface, the people view including:</p>	<p>Responsive to a second input that is subsequent to the first input (e.g., tapping the “People” element), iOS displays a people view on the interface.</p>



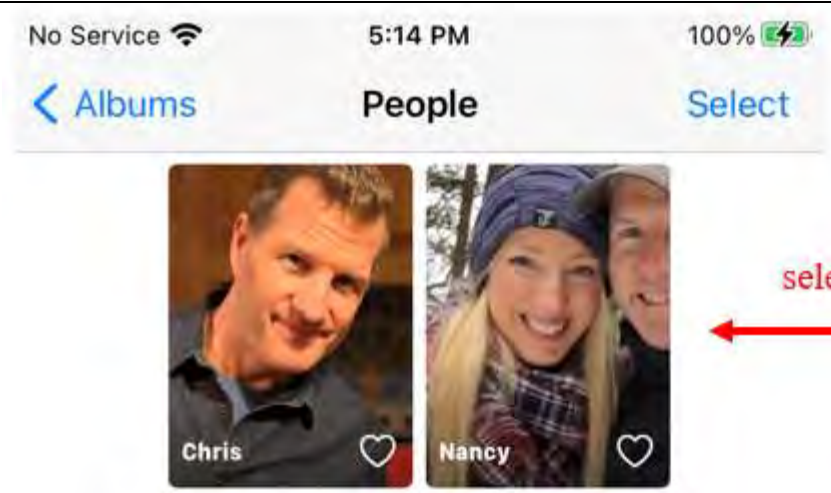
	
<p><b>1[d]ii</b> (i) a first person selectable thumbnail image including a representation of a face of a first person, the first person being associated with a third set of digital files including digital photographs and videos;</p>	<p>The people view includes a first person selectable thumbnail image including a representation of a face of a first person.</p>  <p>The first person is associated with a third set of digital files including digital photographs and videos.</p>

	 <p>representations of digital images in third set of digital photographs and videos →</p>
<p><b>1[d][iii]</b> (ii) a first name associated with the first person, the first name</p>	<p>The people view includes a first name associated with the first person displayed adjacent to the first person selectable thumbnail image.</p>

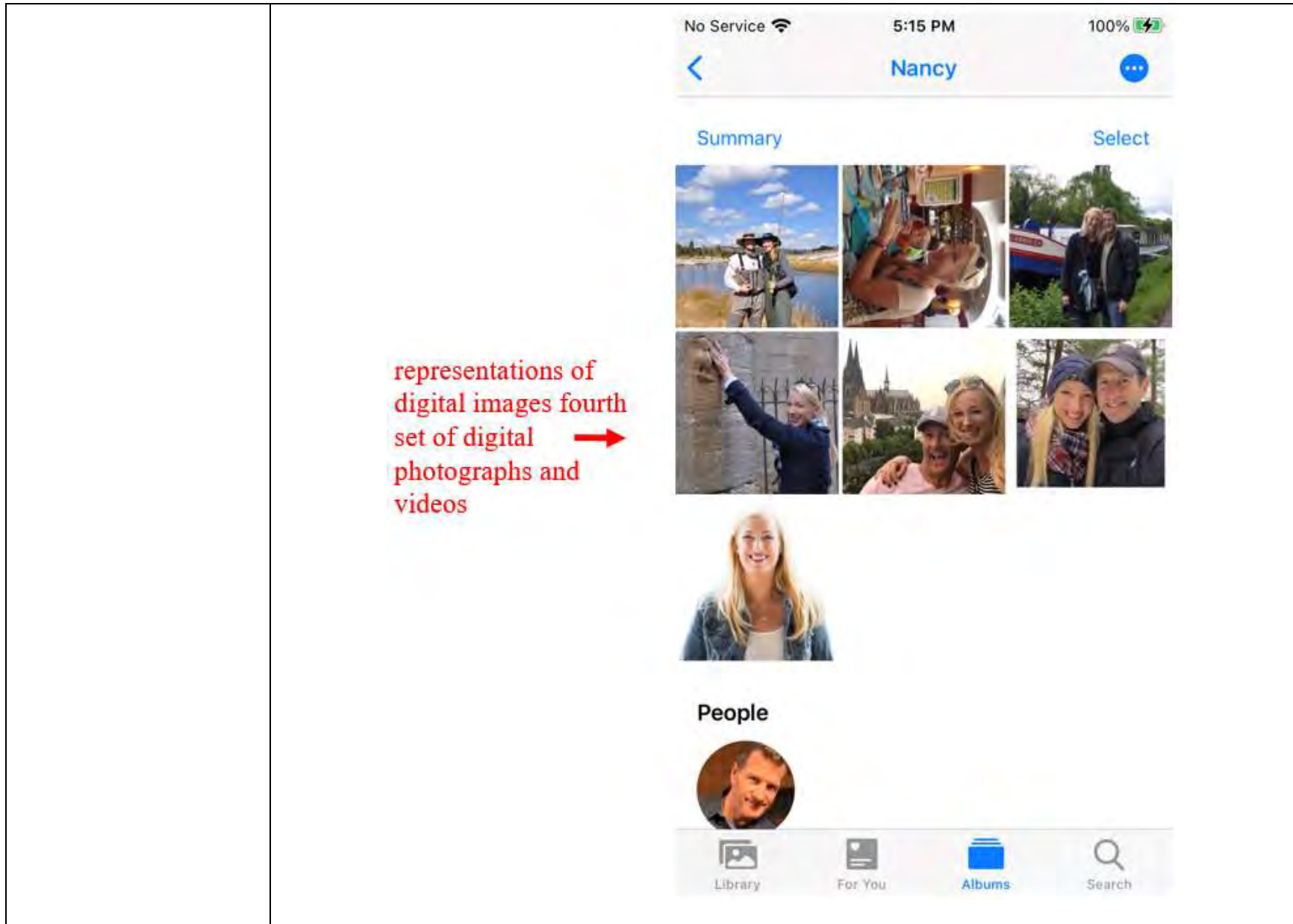
<p>being displayed adjacent to the first person selectable thumbnail image;</p>	 <p>The screenshot shows the 'People' view on an iPhone. At the top, the status bar displays 'No Service', '5:14 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Albums', 'People', and 'Select'. Two person thumbnails are shown side-by-side. The first thumbnail is of a man with the name 'Chris' below it. The second thumbnail is of a woman with the name 'Nancy' below it. Red arrows point from the text 'first person selectable thumbnail image' to the first thumbnail, and from 'first name' to the name 'Chris'.</p> <p>To the extent it is found that the first name associated with the first person is not literally displayed adjacent to the first person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name associated with the first person is to communicate the name of the first person that is associated with the first person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the first name associated with the first person in sufficient proximity to the first person selectable thumbnail image such that a user will associate the first name associated with the first person with the first person selectable thumbnail image. The result of the claimed displaying is that the first name is associated with the first person selectable thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>1[d][iii]</b> (iii) a second person selectable thumbnail image including a representation of a face of a second person, the second person being</p>	<p>The people view includes a second person selectable thumbnail image including a representation of a face of a second person.</p>

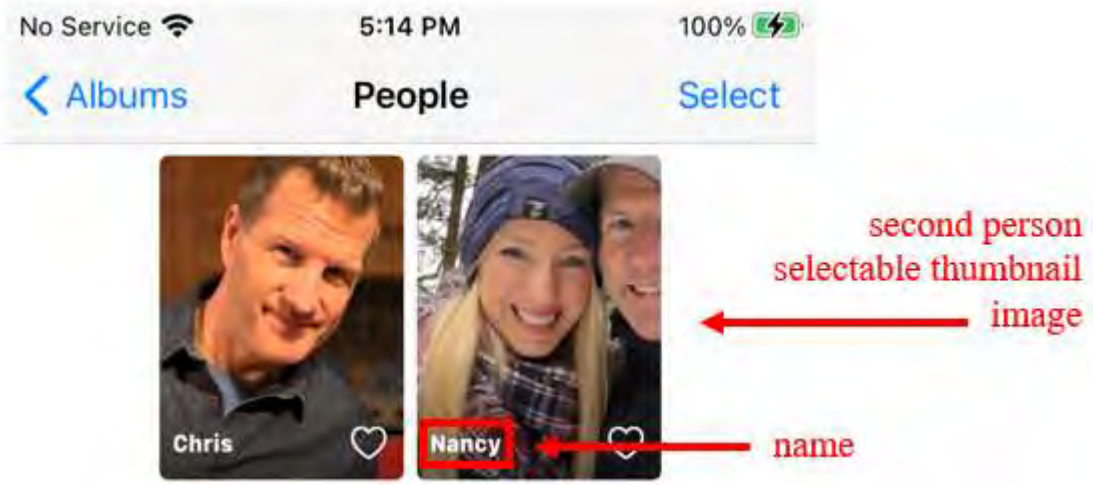



associated with a fourth set of digital files including digital photographs and videos; and

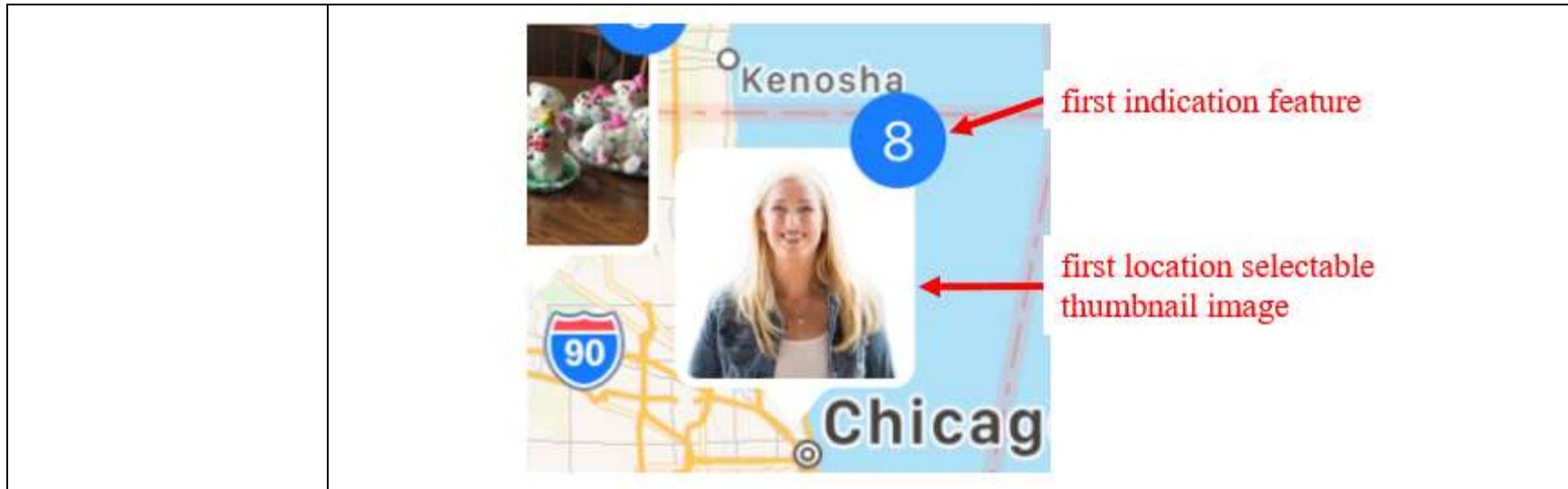


The second person is associated with a fourth set of digital files including digital photographs and videos.



<p><b>1[d][iv]</b> (iv) a second name associated with the second person, the second name being displayed adjacent to the second person selectable thumbnail image.</p>	<p>The people view also includes a second name associated with the second person. The second name being displayed adjacent to the second person selectable thumbnail image. <i>See</i> information for element 1[d][ii].</p>  <p>To the extent it is found that the second name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name associated with the second person is to communicate the name of the second person that is associated with the second person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the second name associated with the second person in sufficient proximity to the second person selectable thumbnail image such that a user will associate the second name associated with the second person with the second person selectable thumbnail image. The result of the claimed displaying is that the second name is associated with the second person selectable thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>2[pre]</b> The method of claim 1, wherein</p>	<p><i>See</i> information for claim 1.</p>


<p><b>2[a]</b> the map view further includes a first indication feature associated with the first location selectable thumbnail image</p>	<p>The map view includes a first indication feature associated with the first location selectable thumbnail image.</p>  <p>The image shows a map view with a blue circle containing the number 8, labeled 'first indication feature'. Below it is a thumbnail image of a woman, labeled 'first location selectable thumbnail image'. The map shows the area between Kenosha and Chicago, with a highway 90 shield visible.</p>
<p><b>2[b]</b> the first indication feature being based on a number of digital files in the first set of digital files.</p>	<p>The first indication feature is based on a number of digital files in the first set of digital files. In the example below, the first indication feature includes the number 8 and the first set of digital files includes 8 digital files.</p>




Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iOS


<p><b>3.</b> The method of claim 2, wherein the first indication feature is connected to the first location selectable thumbnail image.</p>	<p>As shown below, the first indication feature is connected to the first location selectable thumbnail image.</p>

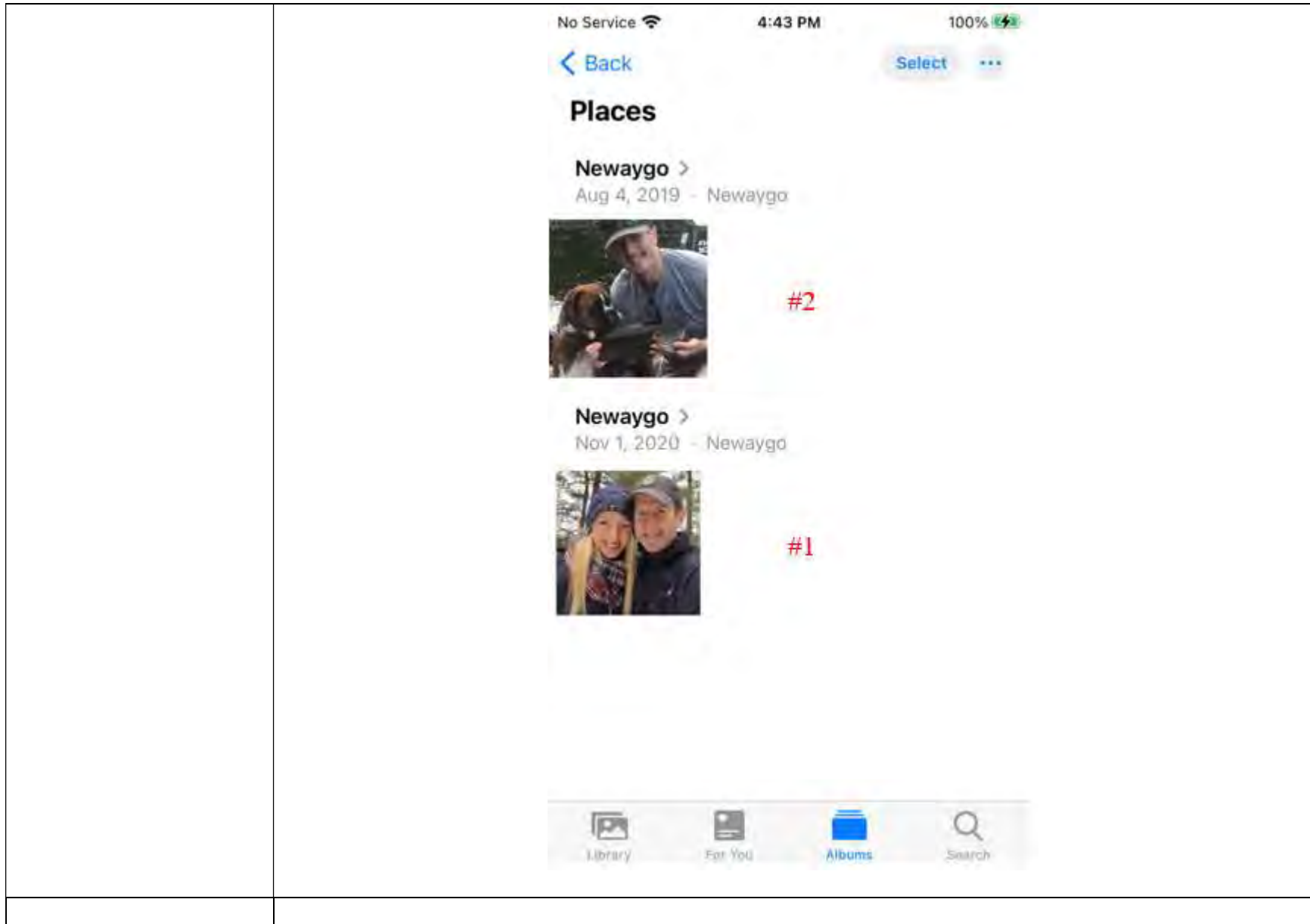


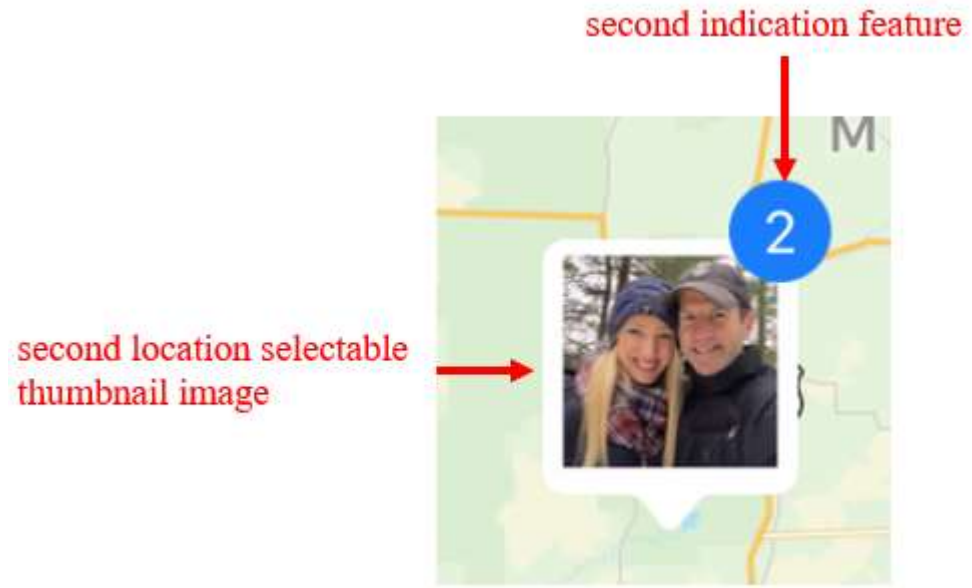
	
<p><b>4.</b> The method of claim 2, wherein the first indication feature includes a first number indicative of the number of digital files in the first set of digital files.</p>	<p>The first indication feature includes a first number indicative of the number of digital files in the first set of digital files. As discussed above for limitation 2[b], in the illustrated example, the first indication feature includes the number 8 and the first set of digital files includes 8 digital files.</p>

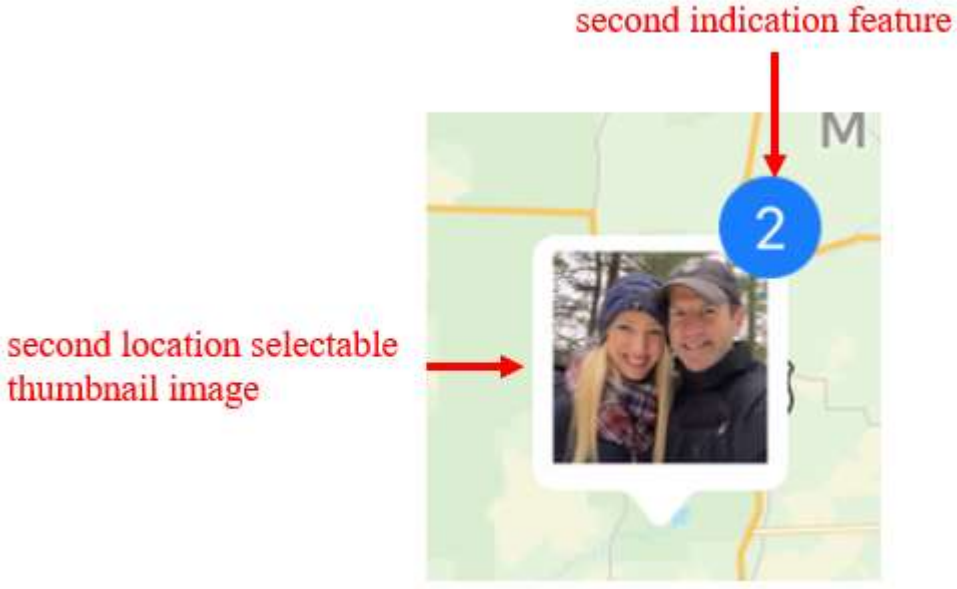


	
<p><b>5[a]</b> The method of claim 2, wherein the map view further includes a second indication feature associated with the second location selectable thumbnail image,</p>	<p>The map view also includes a second indication feature associated with the second location selectable thumbnail image.</p>

	 <p>The diagram illustrates a map interface. A red arrow labeled "second indication feature" points to a blue circular pin containing the number "2". A second red arrow labeled "second location selectable thumbnail image" points to a white-bordered photo of a man and a woman, which is positioned over the map area.</p>
<p><b>5[b]</b> the second indication feature being based on a number of digital files in the second set of digital files.</p>	<p>The second indication feature is based on a number of digital files in the second set of digital files. In the example below, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p>

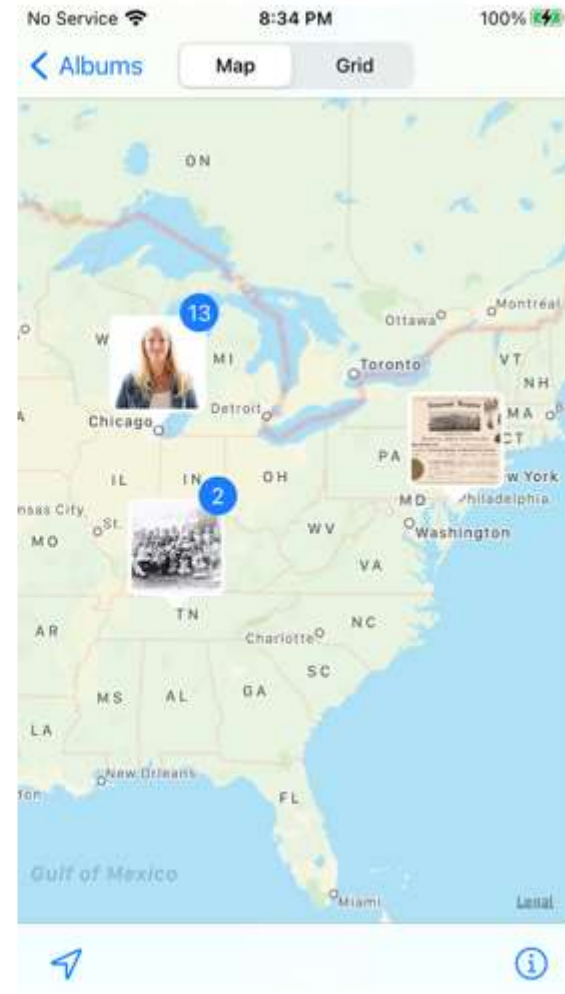
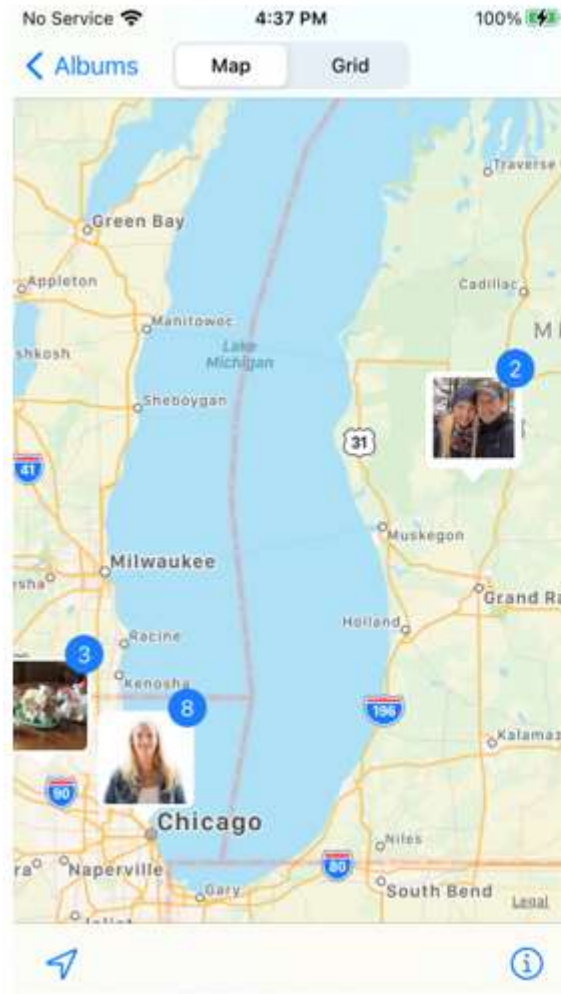


<p><b>6.</b> The method of claim 5, wherein the second indication feature is connected to the second location selectable thumbnail image.</p>	<p>As shown below, the second indication feature is connected to the second location selectable thumbnail image.</p>  <p>The diagram illustrates a map interface. A red arrow labeled "second location selectable thumbnail image" points to a white-bordered photo of a man and a woman. Another red arrow labeled "second indication feature" points to a blue circular icon containing the number "2", which is positioned on a map background.</p>
<p><b>7.</b> The method of claim 5, wherein the second indication feature includes a second number indicative of the number of digital files in the second set of digital files.</p>	<p>The second indication feature includes a second number indicative of the number of digital files in the second set of digital files. As discussed above for limitation 5[b], in the illustrated example, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p>

	
<p><b>8.</b> The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming in on the interactive map, modifying the first indication feature.</p>	<p>Subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming in on the interactive map, iOS modifies the first indication feature. In the example below, the first indication feature includes the number 13 when the map view is displayed at a first zoom level, which is then modified responsive to zooming in.</p>

	<p>The image contains two screenshots of the Apple Maps application. The left screenshot, taken at 8:34 PM, shows a map of the United States with a blue circle containing the number '13' over the Chicago area and another blue circle containing the number '2' in the Midwest. The right screenshot, taken at 4:37 PM, shows a zoomed-in view of the Chicago area with markers labeled '2', '3', '8', and '13'.</p>
<p><b>9.</b> The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive</p>	<p>Subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming out on the interactive map, iOS modifies the first indication feature. In the example below, the second indication feature is used as an illustrative example where the indication changes from 8 to 13 responsive to zooming out on the interactive map.</p>

to an input that is indicative of zooming out on the interactive map, modifying the first indication feature.



**12[pre]** The method of claim 1, wherein

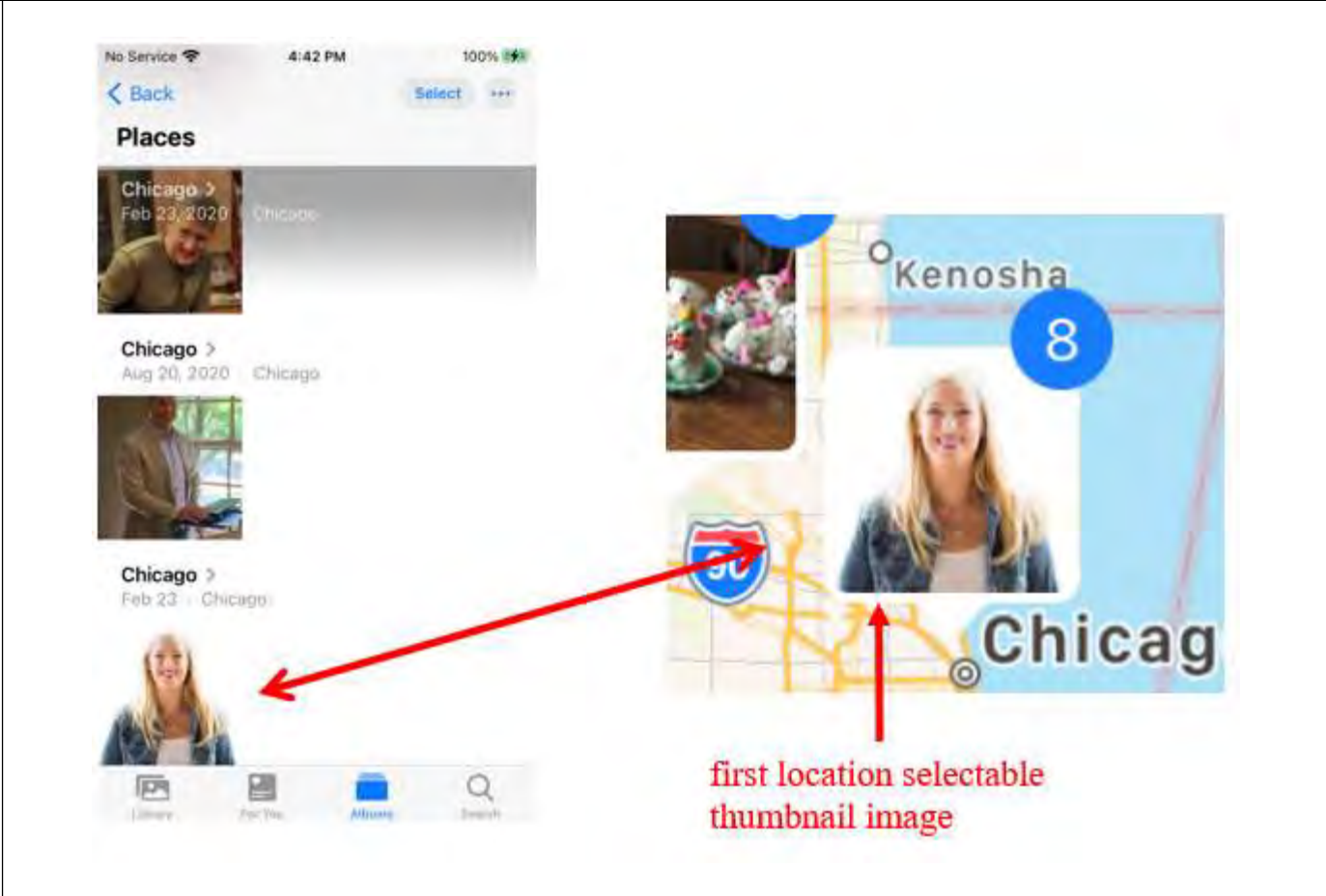
See information for claim 1.

**12[a]** the first location selectable thumbnail

The first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files.

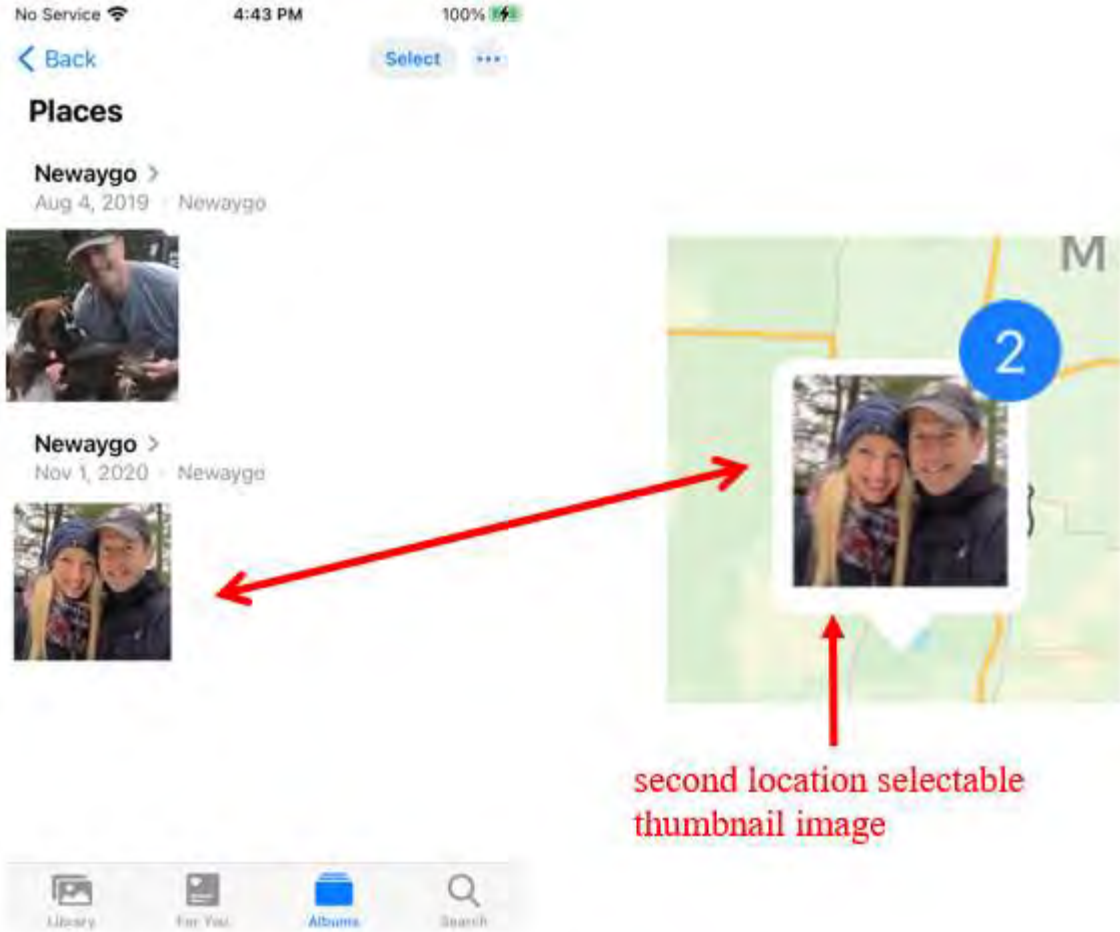


image includes a representation of at least one of the digital files in the first set of digital files, and

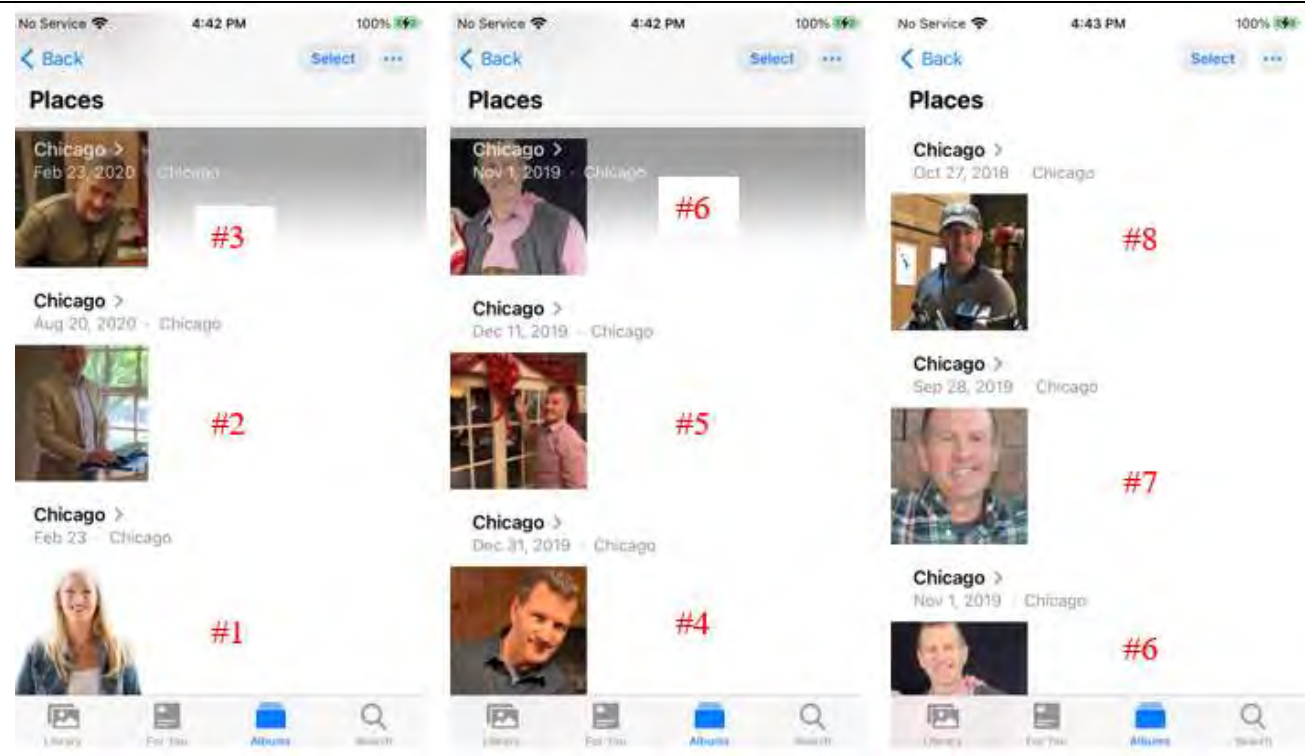


**12[b]** wherein the second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.

The second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.

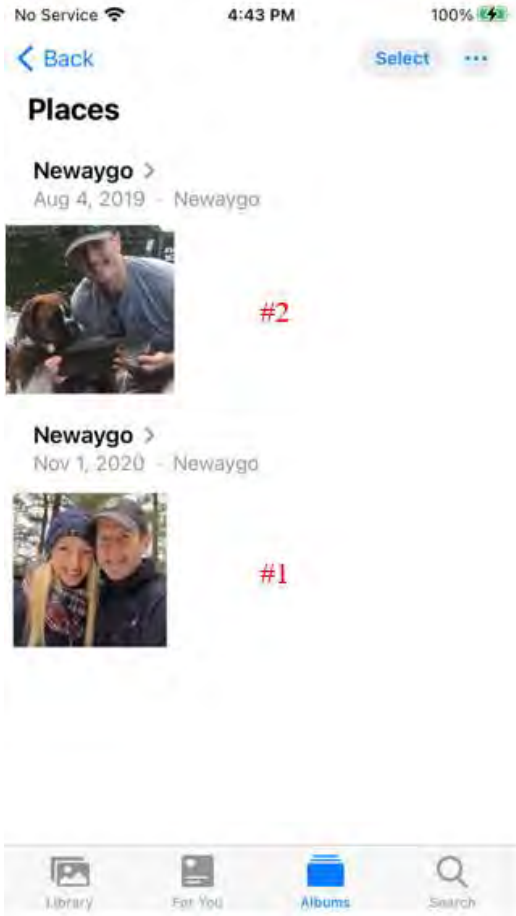
	 <p data-bbox="1285 945 1682 1024">second location selectable thumbnail image</p>
<p><b>14[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>14[a]</b> the first location view includes a representation of at least a portion of all of the</p>	<p>The first location view includes a representation of at least a portion of all of the digital files in the first set of digital files (in this example, 8).</p>

digital files in the first set of digital files and



**14[b]** the second location view includes a representation of at least a portion of all of the digital files in the second set of digital files.

The second location view includes a representation of at least a portion of all of the digital files in the second set of digital files (in this example, 2).

	 <p>The screenshot shows the Photos app interface on an iPhone. At the top, the status bar displays 'No Service', '4:43 PM', and '100%' battery. Below the status bar, there are navigation options: a blue '&lt; Back' button and a 'Select' button with a three-dot menu icon. The main content area is titled 'Places' and lists two photo albums from 'Newwaygo'. The first album, dated 'Aug 4, 2019', shows a photo of a man with a dog and is marked with a red '#2'. The second album, dated 'Nov 1, 2020', shows a photo of a man and a woman and is marked with a red '#1'. At the bottom, the dock contains icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>15[pre]</b> The method of claim 1, further comprising:</p>	<p>See information for claim 1.</p>
<p><b>15[a]</b> responsive to an input that is indicative of a selection, in the first location view, of the</p>	<p>Responsive to an input that is indicative of a selection, in the first location view, of the representation of the at least a portion of the one digital file in the first set of digital files, iOS displays a first digital file on the interface.</p>

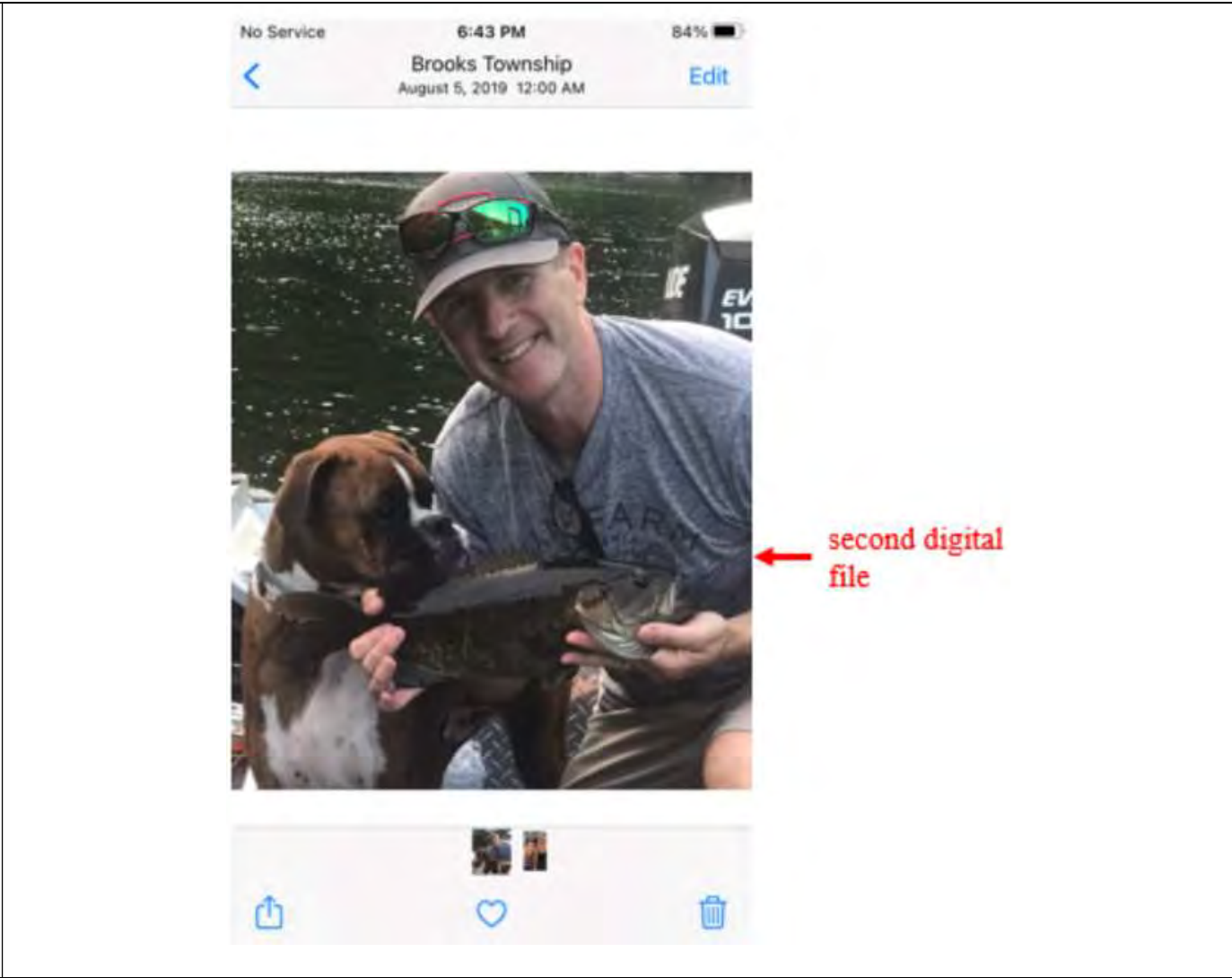
representation of the at least a portion of the one digital file in the first set of digital files, causing a first digital file to be displayed on the interface; and



**15[b]** responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second

Responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital files, iOS displays a second digital file on the interface.

set of digital files, causing a second digital file to be displayed on the interface.

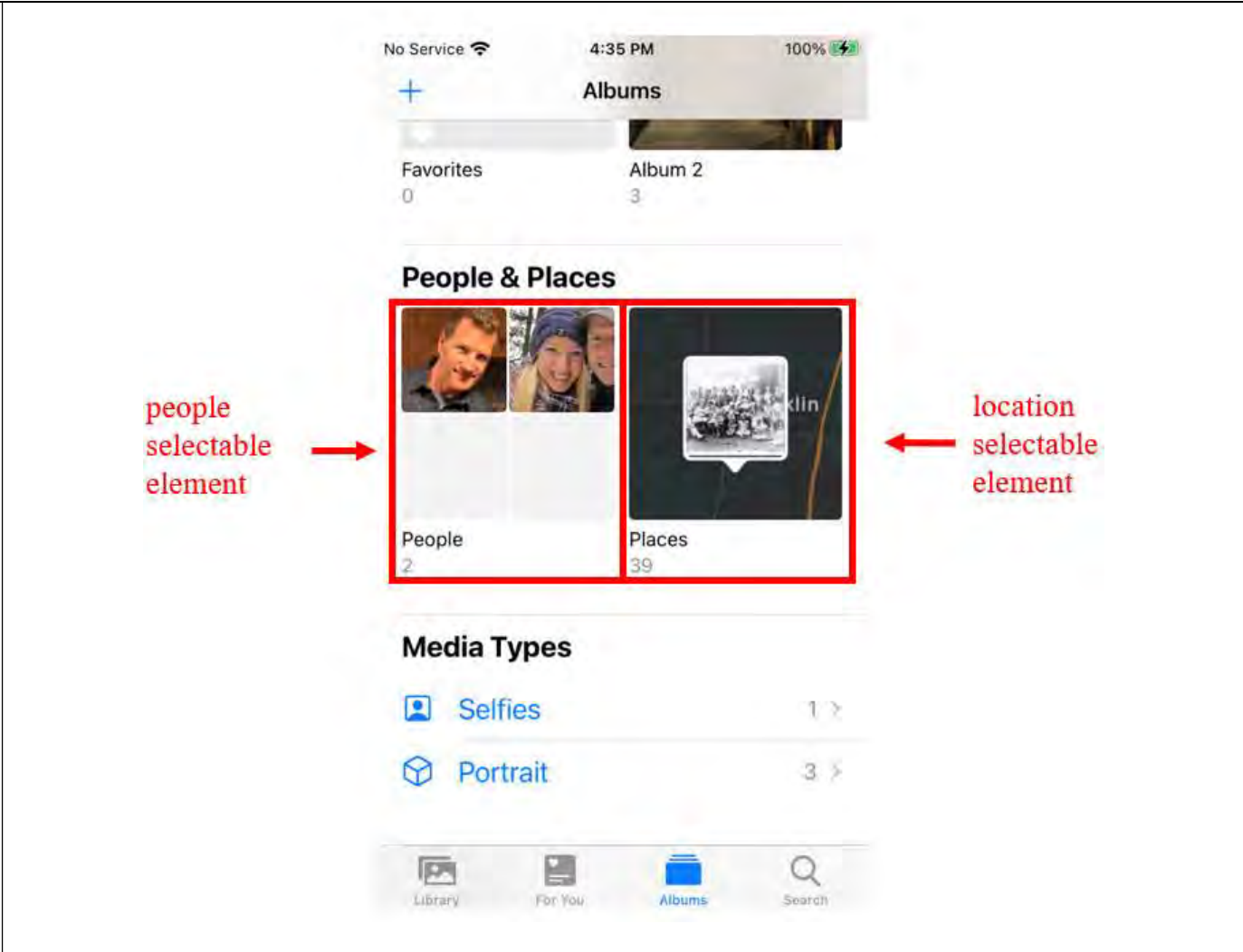


**17[a]** The method of claim 1, further comprising, prior to receiving the first input,

Prior to receiving the first input (see information for element 1[a]), iOS causes the interface to display a plurality of selectable elements. The plurality of selectable elements include a location selectable element and a people selectable element.



causing the interface to display a plurality of selectable elements, the plurality of selectable elements including a location selectable element and a people selectable element,



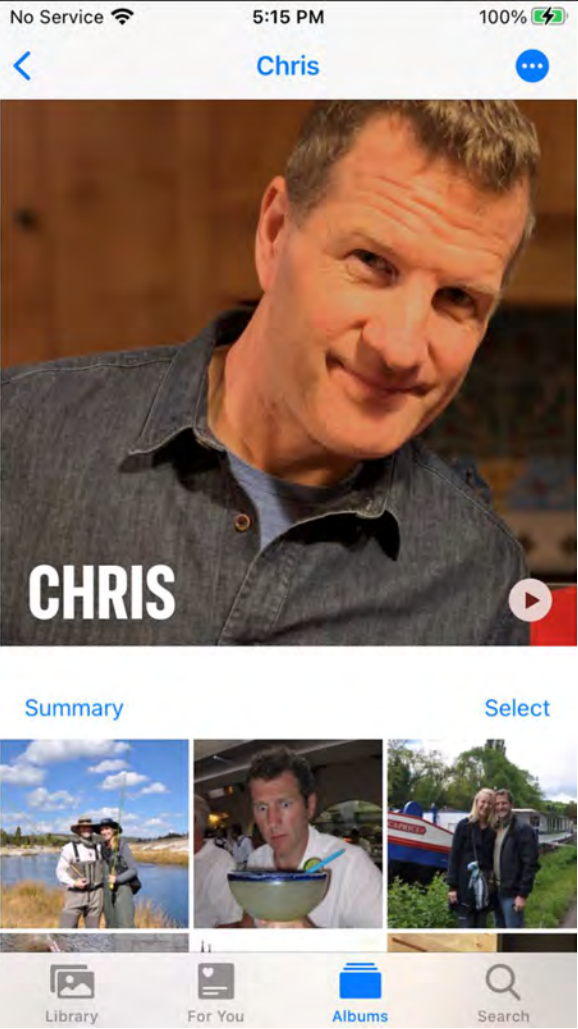
**17[b]** wherein the first input is indicative of a selection of the location selectable element, and  
**17[c]** wherein the second input is indicative of a

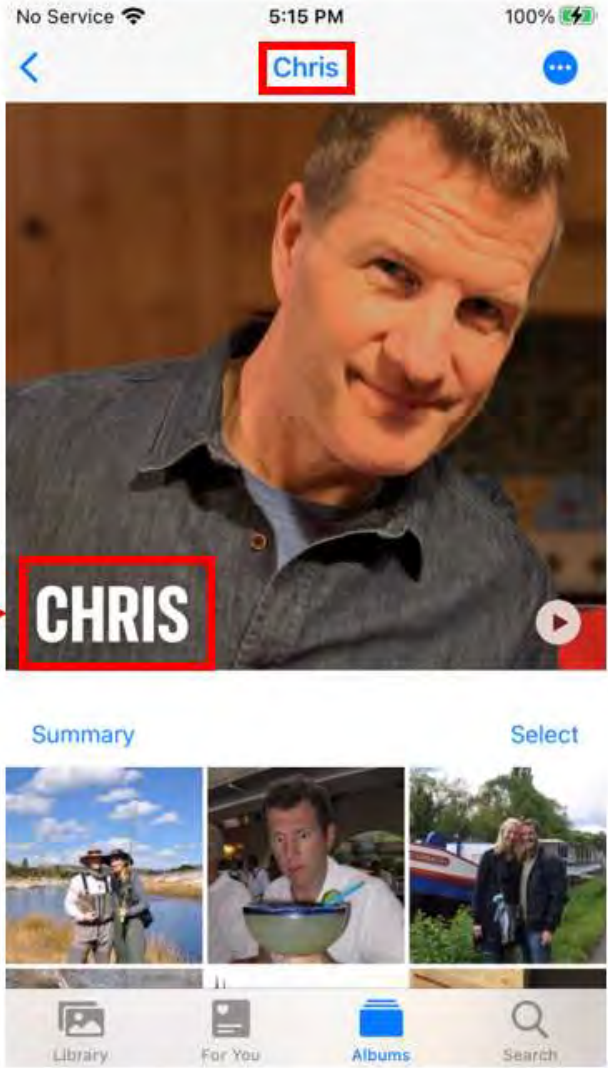
The first input is indicative of a selection of the location selectable element. *See* information for limitation 1[a].  
The second input is indicative of a selection of the people selectable element. *See* information for limitation 1[d].



Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iOS

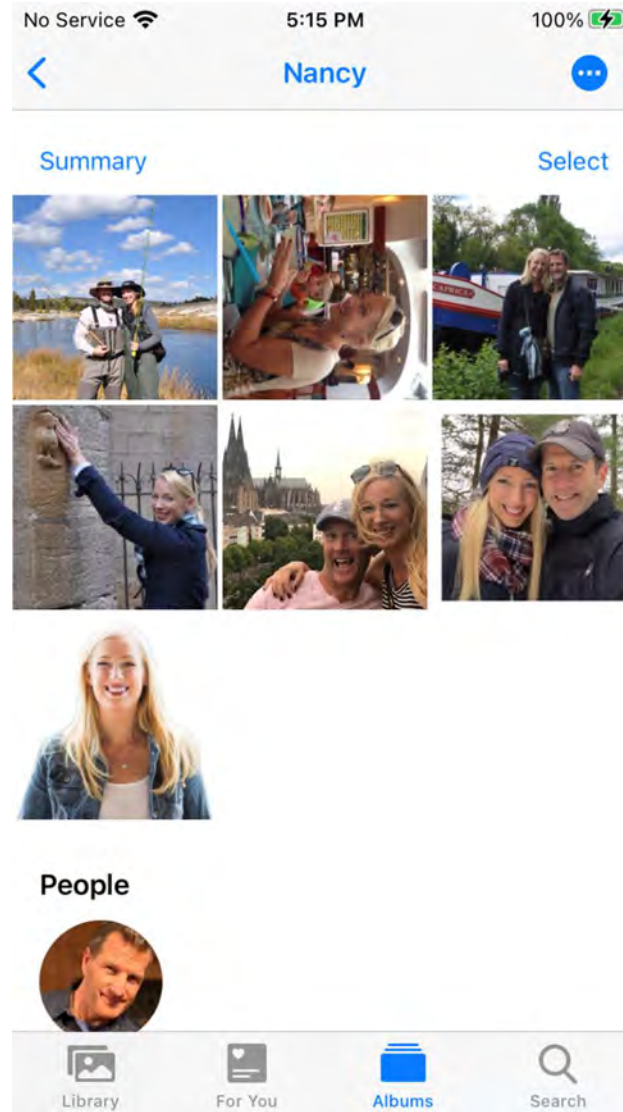
<p>selection of the people selectable element.</p>	
<p><b>18<pre></pre></b> The method of claim 1, further comprising</p>	<p><i>See</i> information for claim 1.</p>
<p><b>18[a]</b> responsive to an input that is indicative of a selection of the first person selectable thumbnail image, causing a first person view to be displayed on the interface, the first person view including</p>	<p>Responsive to an input that is indicative of a selection of the first person selectable thumbnail image, iOS causes a first person view to be displayed on the interface.</p>

	 <p>The screenshot shows an iPhone interface for a contact named Chris. At the top, the status bar displays 'No Service', '5:15 PM', and '100%' battery. Below the status bar is a navigation bar with a back arrow, the name 'Chris', and a three-dot menu icon. The main content area features a large portrait photo of Chris with the name 'CHRIS' in white text at the bottom left and a play button icon at the bottom right. Below this photo is a row of three smaller photo thumbnails. The first thumbnail shows two people in outdoor gear near a lake. The second shows Chris holding a bowl. The third shows two people standing outdoors. Below the thumbnails are the labels 'Summary' and 'Select'. At the bottom is a navigation bar with icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>18[b]</b> (i) the first name and (ii) a representation of each digital file in the third set of digital files.</p>	<p>The first person view includes the first name and a representation of each digital file in the third set of digital files.</p>

	 <p data-bbox="863 771 1024 808">first name →</p> <p data-bbox="709 998 1081 1172">representations digital files in third set of digital photographs and videos →</p>
<p><b>19[pre]</b> The method of claim 18, further comprising</p>	<p>See information for claim 18.</p>

**19[a]** responsive to an input that is indicative of a selection of the second person selectable thumbnail image, causing a second person view to be displayed on the interface, the second person view including

Responsive to an input that is indicative of a selection of the second person selectable thumbnail image, iOS causes a second person view to be displayed on the interface.



19[b] (i) the second name and (ii) a representation of each digital file in the fourth set of digital files.

The second person view includes the second name and a representation of each digital file in the fourth set of digital files.

representations digital files in fourth set of digital photographs and videos →



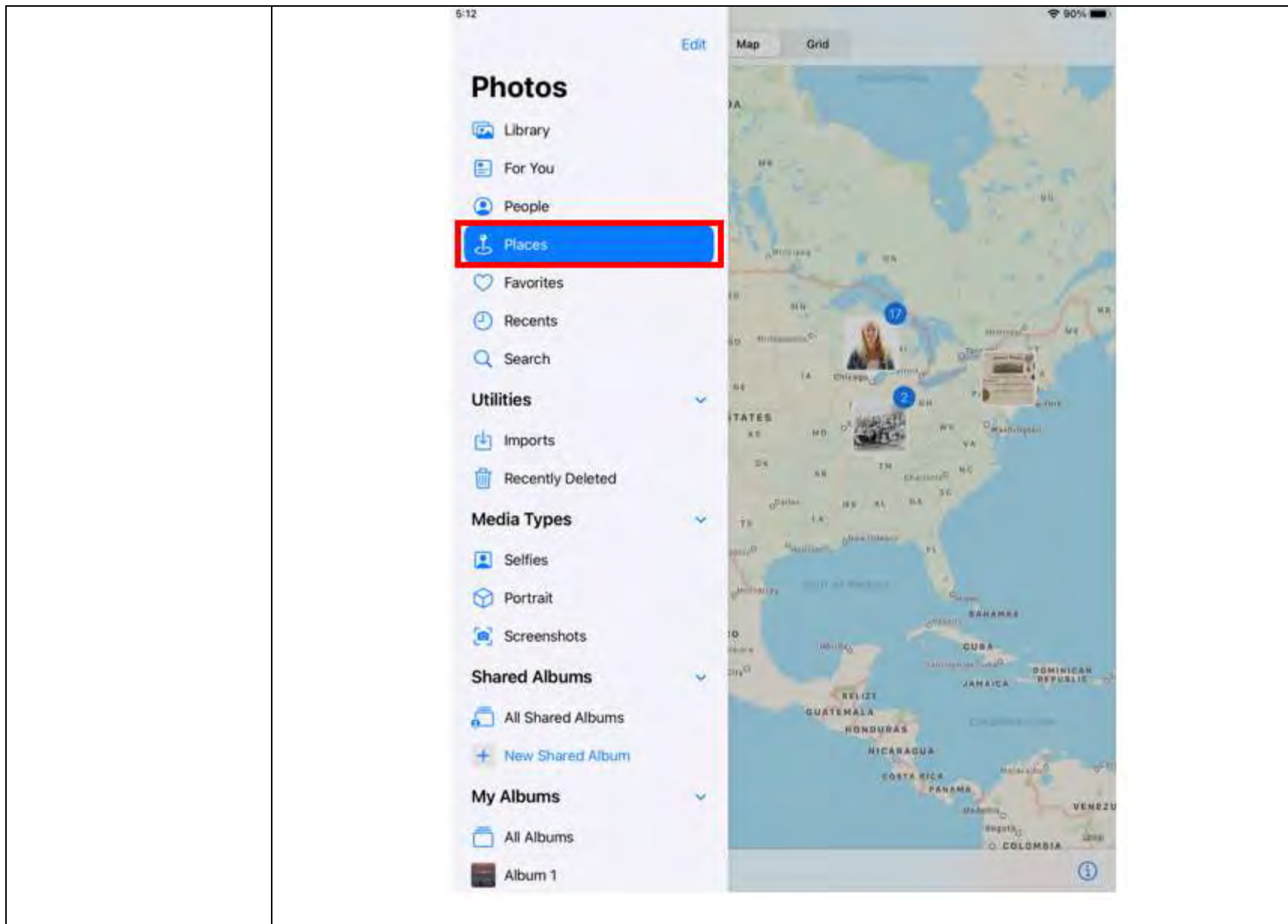
# **Exhibit C.2**

**U.S. Patent No. 10,621,228 – Infringement Claim Chart**

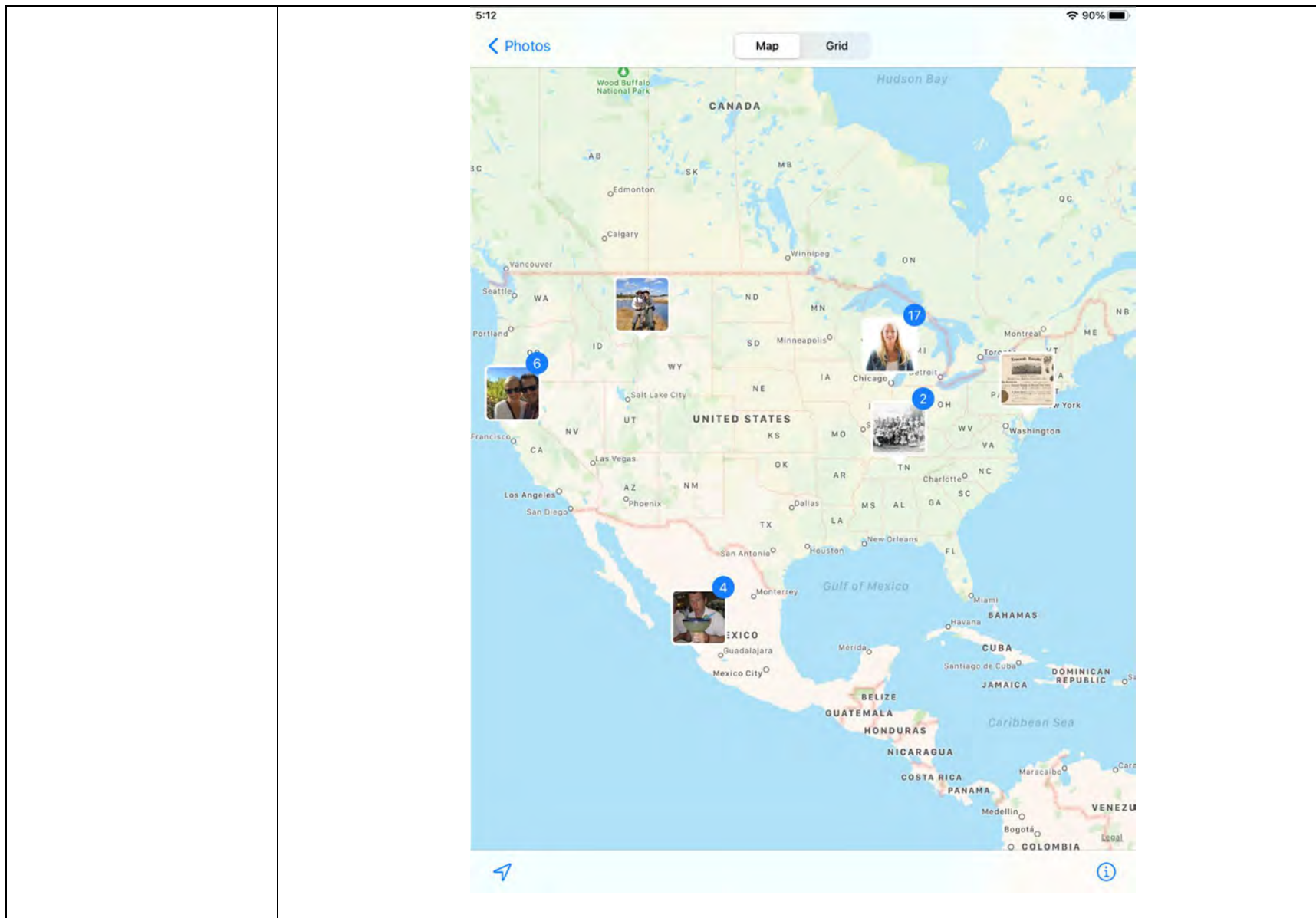
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,621,228 (“the ‘228 patent”) in Apple iPadOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPad mini (5<sup>th</sup> Generation) running iPadOS 14.6. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<b>1[pre]</b> A method comprising:	To the extent the preamble is limiting, iPadOS performs a method, as detailed below.
<b>1[a]</b> responsive to a first input, causing a map view to be displayed on an interface, the map view including:	Responsive to a first input (e.g., tapping the “Places” element), iPadOS displays a map view on an interface (e.g., an Apple iPad).



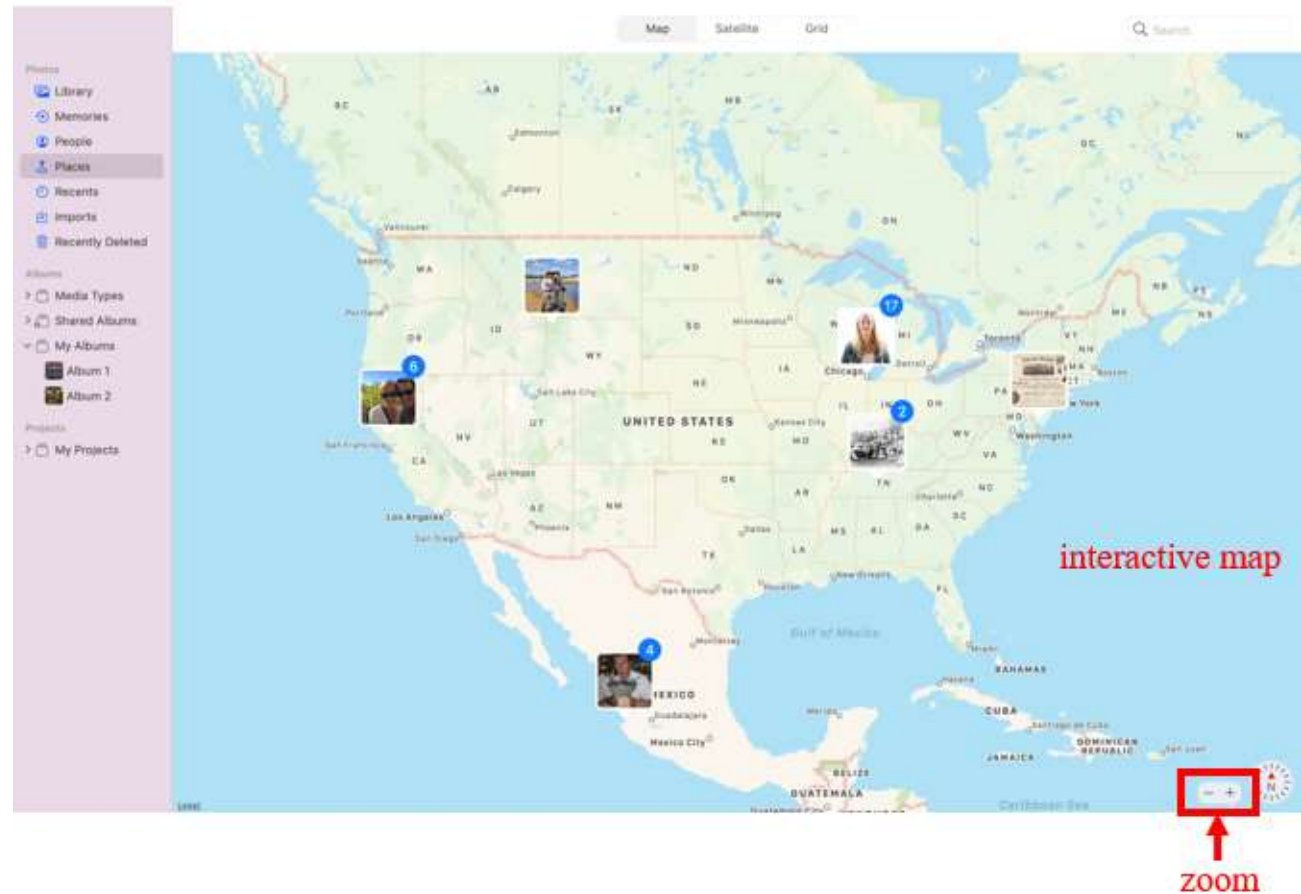


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS

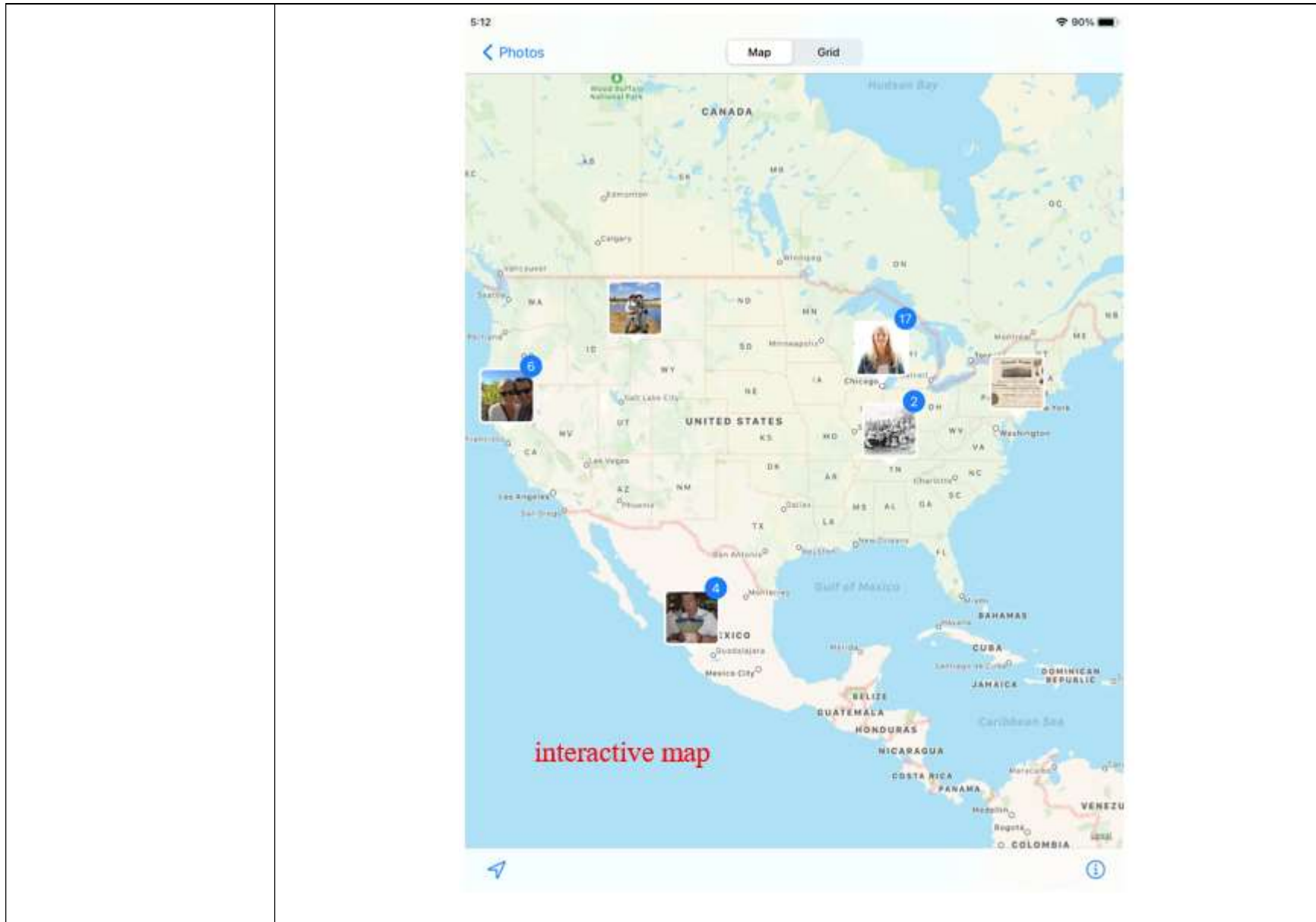


**1[a]i** (i) an interactive map;

The map view includes an interactive map. The map is interactive at least because iPadOS can zoom in and out.



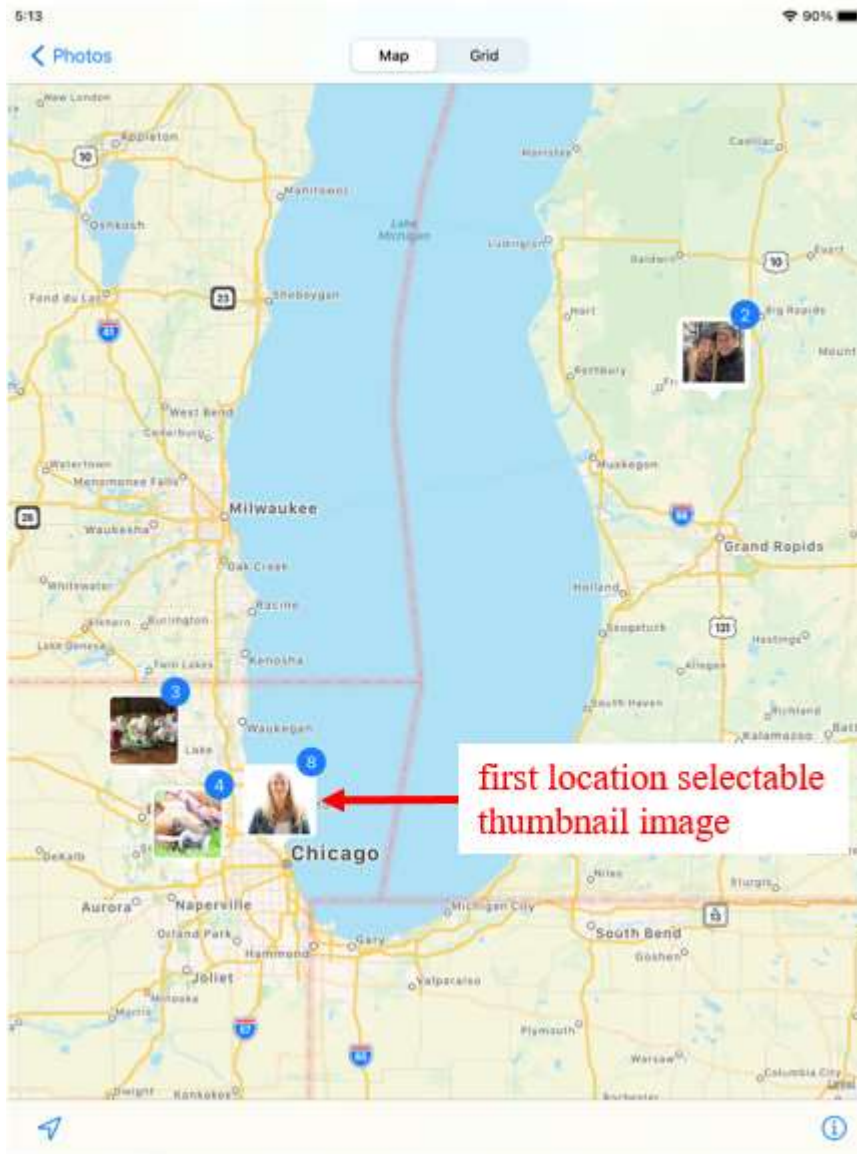
A zoomed in view is shown below.



**1[a][ii]** (ii) a first location selectable

The map view includes a first location selectable thumbnail image at a first location on the interactive map.

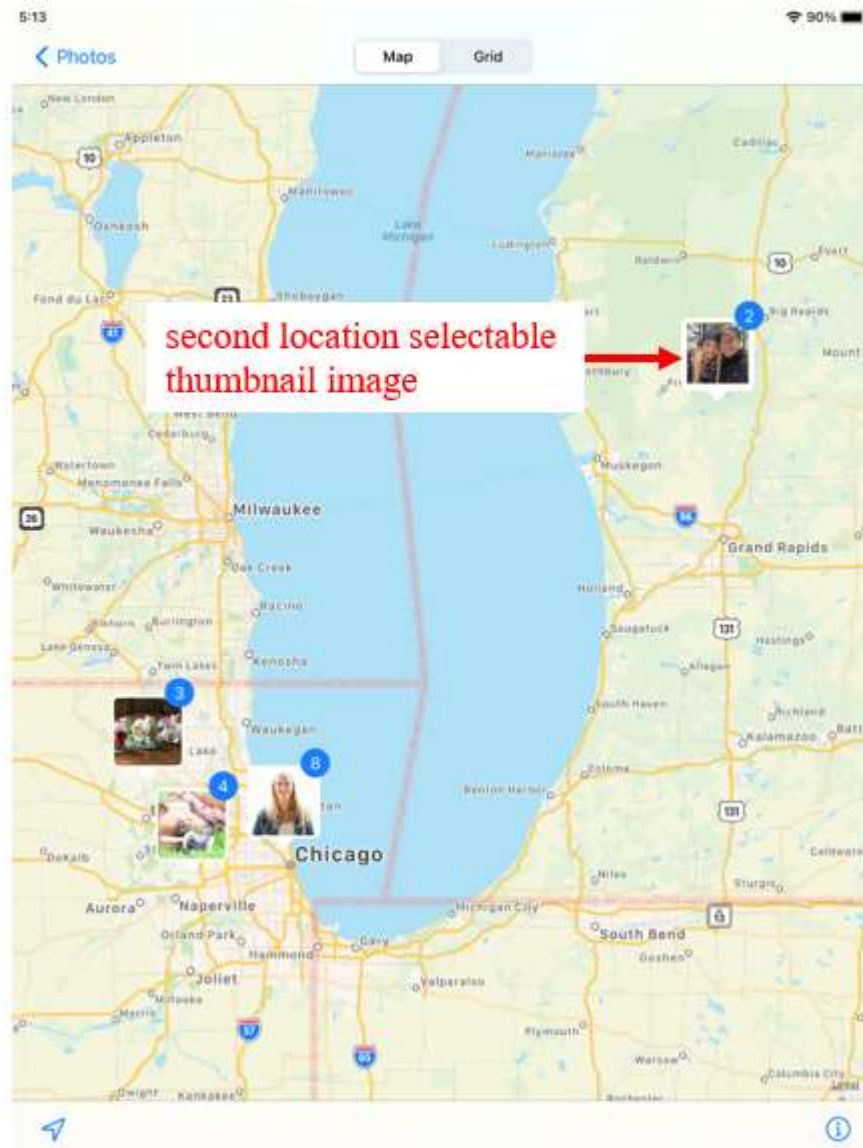
thumbnail image at a first location on the interactive map; and





**1[a][iii]** (iii) a second location selectable thumbnail image at a second location on the interactive map;

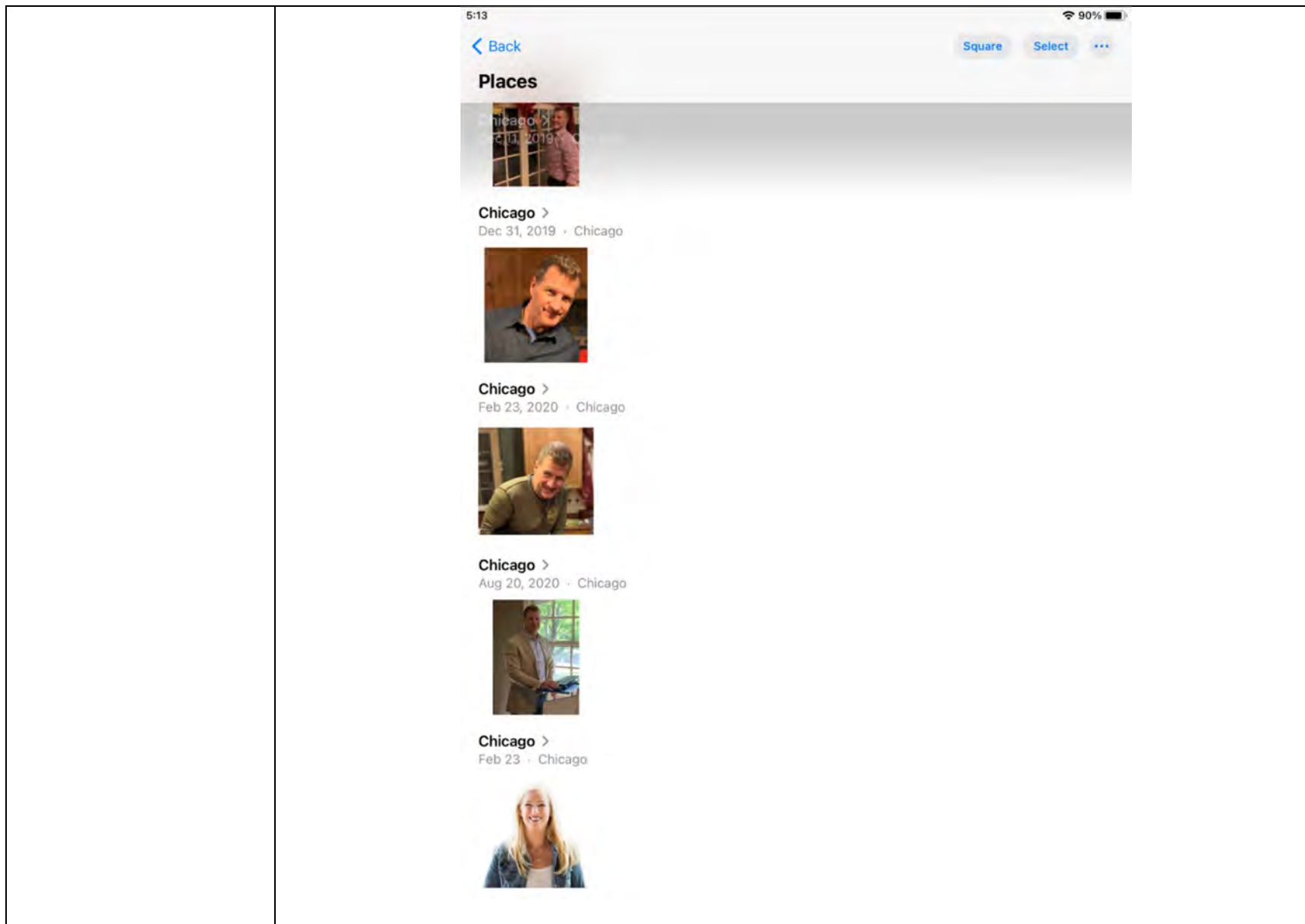
The map view includes a second location selectable thumbnail image at a second location on the interactive map.



Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS

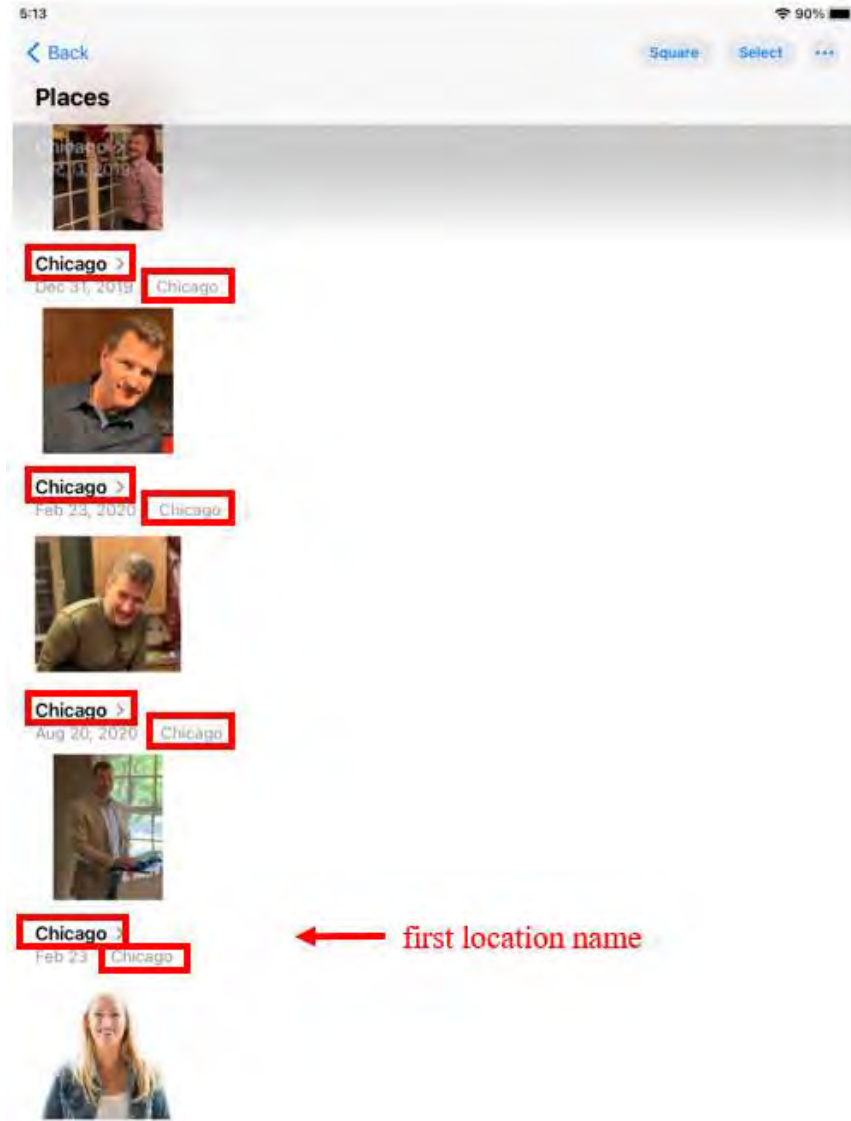
<p><b>1[b]</b> responsive to an input that is indicative of a selection of the first location selectable thumbnail image, causing a first location view to be displayed on the interface, the first location view including</p>	<p>Responsive to an input that is indicative of a selection of the first location selectable thumbnail image, iPadOS displays a first location view on the interface.</p>
---	---





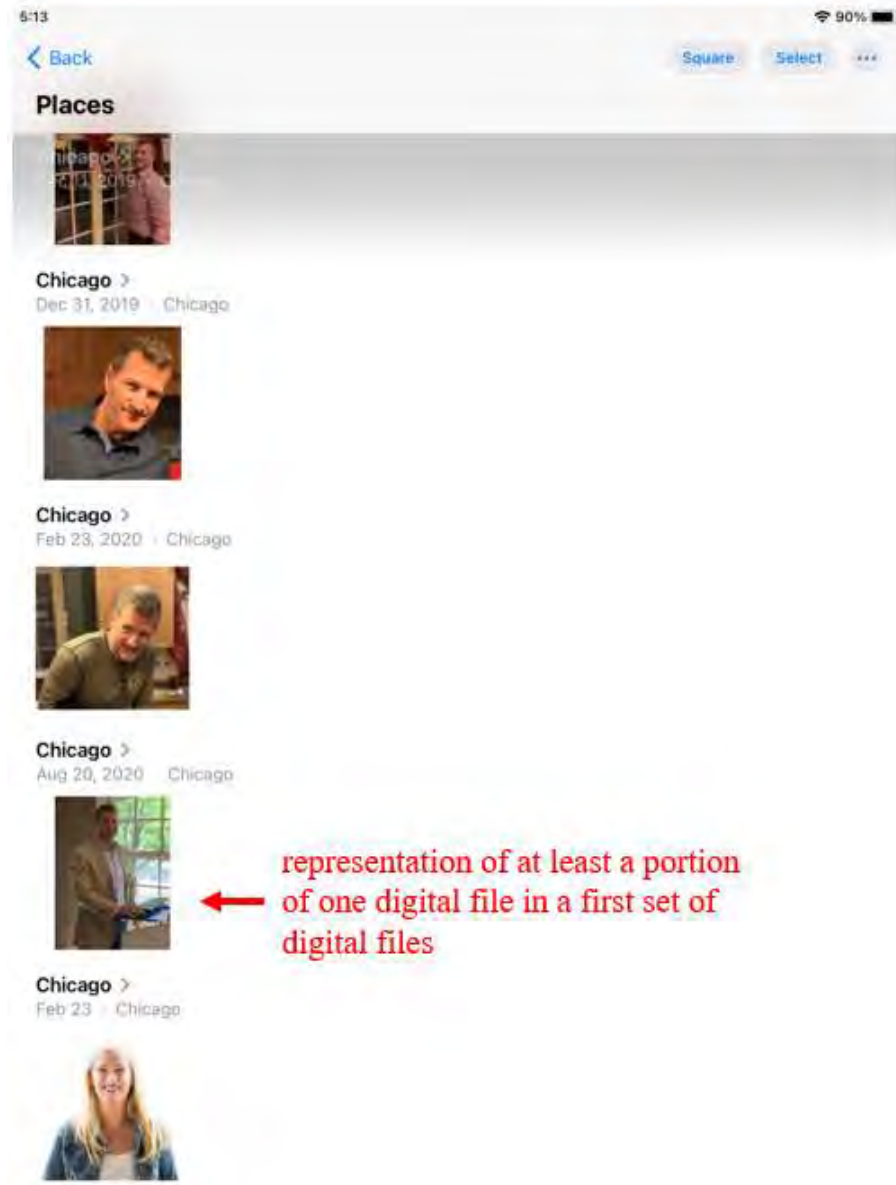
1[b][i] (i) a first location name associated with the first location and

The first location view includes a first location name associated with the first location (in this example, Chicago).




**1[b][ii]** (ii) a representation of at least a portion of one digital file in a first set of digital files, each of the digital files in the first set of digital files being produced from outputs of one or more digital imaging devices, the first set of digital files including digital files associated with the first location;

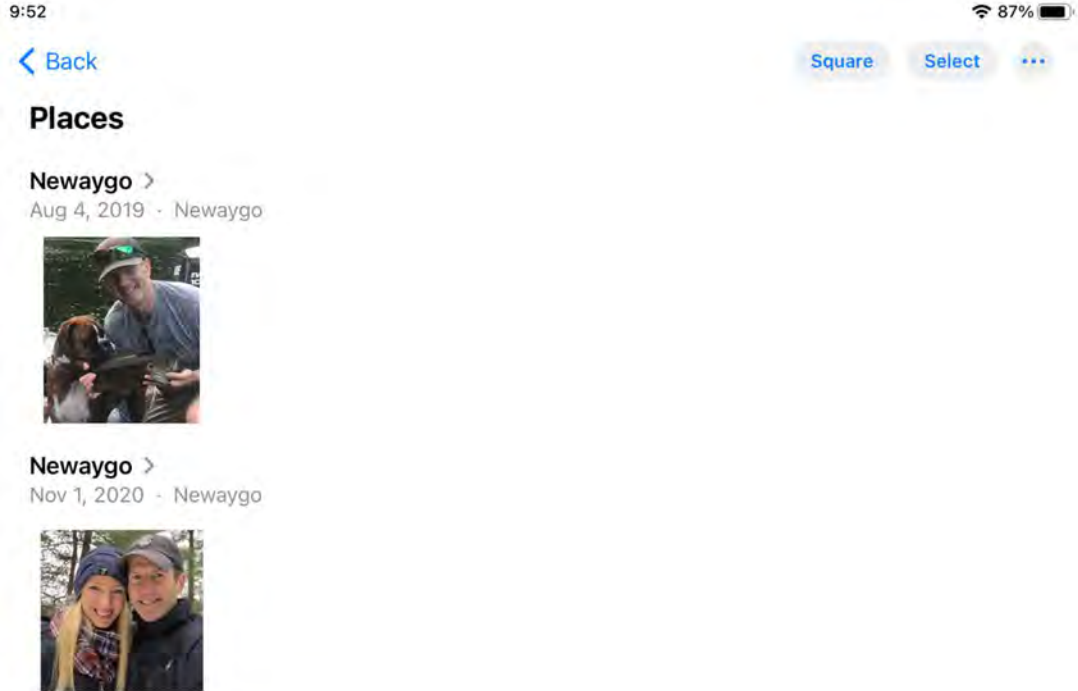
The first location view includes a representation of at least a portion of one digital file in a first set of digital files.

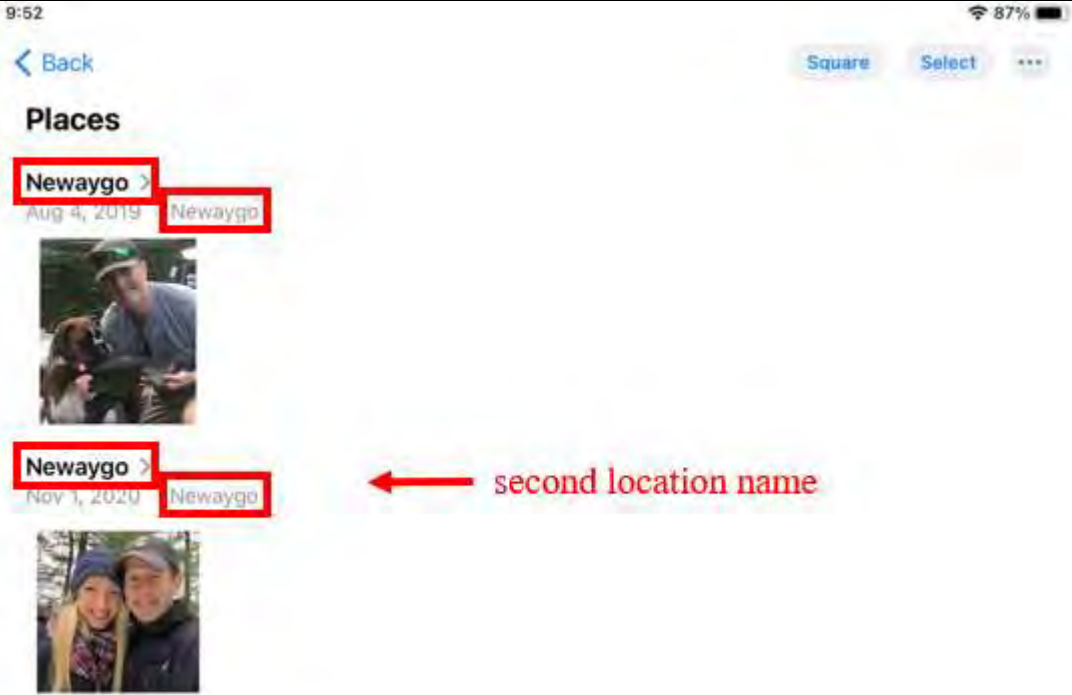


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS




	Each of the digital files in the first set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).
--	---

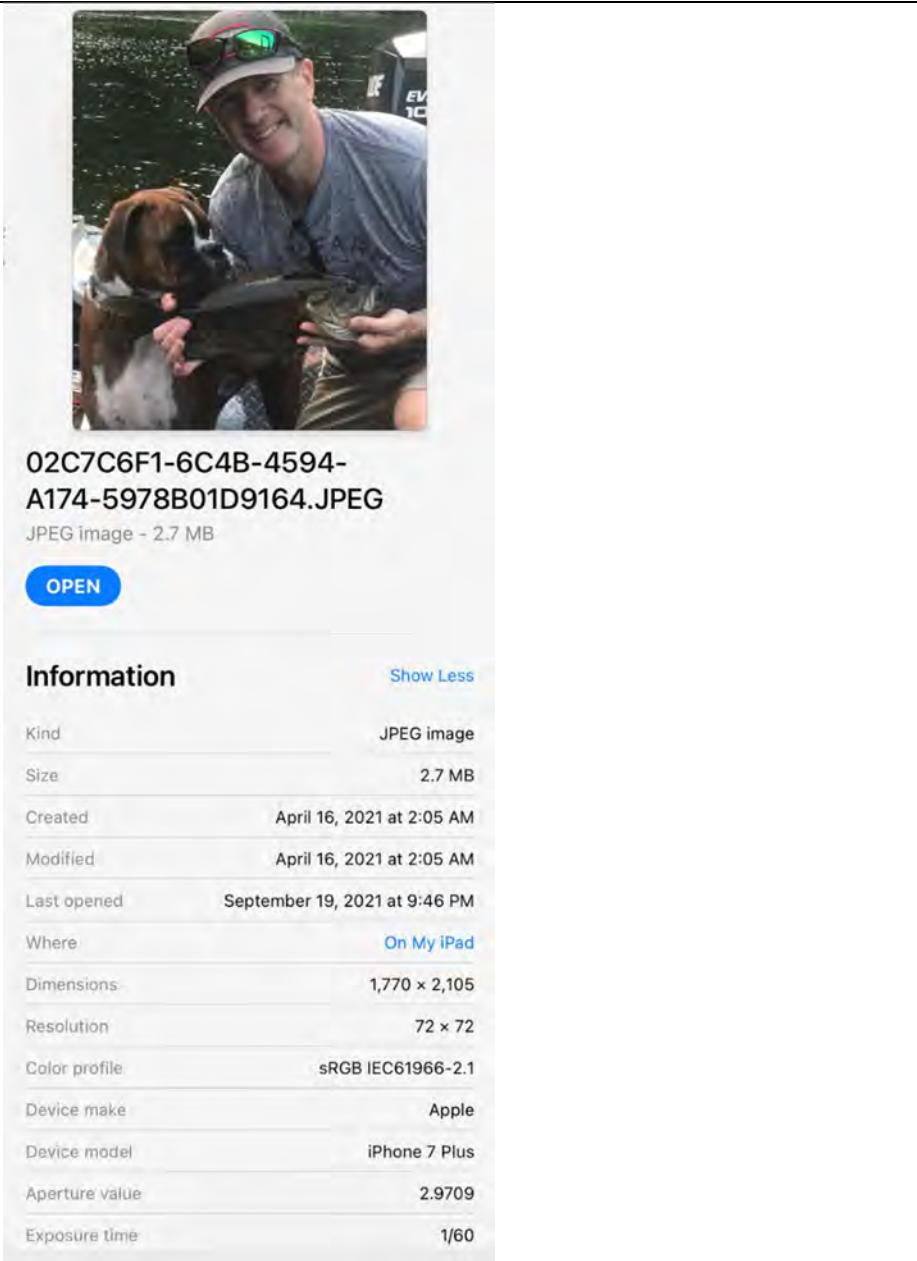
	 <p><b>459029F4-D9FE-4284-94...951B28F9.JPEG</b> JPEG image - 2 MB</p> <p><a href="#">OPEN</a></p> <p><b>Information</b> <a href="#">Show Less</a></p> <table><tr><td>Kind</td><td>JPEG image</td></tr><tr><td>Size</td><td>2 MB</td></tr><tr><td>Created</td><td>April 16, 2021 at 2:04 AM</td></tr><tr><td>Modified</td><td>April 16, 2021 at 2:04 AM</td></tr><tr><td>Last opened</td><td>September 19, 2021 at 9:36 PM</td></tr><tr><td>Where</td><td><a href="#">On My iPad</a></td></tr><tr><td>Dimensions</td><td>3,024 × 4,032</td></tr><tr><td>Resolution</td><td>72 × 72</td></tr><tr><td>Device make</td><td>Apple</td></tr><tr><td>Device model</td><td>iPhone XR</td></tr><tr><td>Lens model</td><td>iPhone XR back camera 4.25mm f/1.8</td></tr><tr><td>Aperture value</td><td>1.696</td></tr></table>	Kind	JPEG image	Size	2 MB	Created	April 16, 2021 at 2:04 AM	Modified	April 16, 2021 at 2:04 AM	Last opened	September 19, 2021 at 9:36 PM	Where	<a href="#">On My iPad</a>	Dimensions	3,024 × 4,032	Resolution	72 × 72	Device make	Apple	Device model	iPhone XR	Lens model	iPhone XR back camera 4.25mm f/1.8	Aperture value	1.696
Kind	JPEG image																								
Size	2 MB																								
Created	April 16, 2021 at 2:04 AM																								
Modified	April 16, 2021 at 2:04 AM																								
Last opened	September 19, 2021 at 9:36 PM																								
Where	<a href="#">On My iPad</a>																								
Dimensions	3,024 × 4,032																								
Resolution	72 × 72																								
Device make	Apple																								
Device model	iPhone XR																								
Lens model	iPhone XR back camera 4.25mm f/1.8																								
Aperture value	1.696																								

	<p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone XR (a digital imaging device), as shown in the iPadOS Files application. The first set of digital files includes digital files associated with the first location (in this example, Chicago).</p>
<p><b>1[c]</b> responsive to an input that is indicative of a selection of the second location selectable thumbnail image, causing a second location view to be displayed on the interface, the second location view including</p>	<p>Responsive to an input that is indicative of a selection of the second location selectable thumbnail image, iPadOS displays a second location view on the interface.</p>  <p>The screenshot shows the iPadOS Files application interface. At the top, the time is 9:52 and the battery level is 87%. A blue 'Back' button is visible. Below the 'Back' button is a section titled 'Places'. Under 'Places', there are two location entries from 'Newygo'. The first entry is dated 'Aug 4, 2019' and features a thumbnail image of a man with a dog. The second entry is dated 'Nov 1, 2020' and features a thumbnail image of a man and a woman. At the top right of the interface, there are three buttons: 'Square', 'Select', and a three-dot menu icon.</p>
<p><b>1[c]i</b> (i) a second location name associated with the second location and</p>	<p>The second location view includes a second location name associated with the second location.</p>

	 <p>The screenshot shows the 'Places' section of an iPadOS app. At the top, there is a 'Back' button and 'Square' and 'Select' options. Below the title 'Places', there are two location entries. The first entry is dated 'Aug 4, 2019' and features a photo of a man with a dog. The second entry is dated 'Nov 1, 2020' and features a photo of a man and a woman. In both entries, the name 'Newaygo' is highlighted with a red box. A red arrow points from the text 'second location name' to the 'Newaygo' name in the second entry.</p>
<p><b>1[c][ii]</b> (ii) a representation of at least a portion of one digital file in a second set of digital files, each of the digital files in the second set of digital files being produced from outputs of the one or more digital imaging devices, the second set of digital files including digital files associated with the second location; and</p>	<p>The second location view includes a representation of at least a portion of one digital file in a second set of digital files.</p>

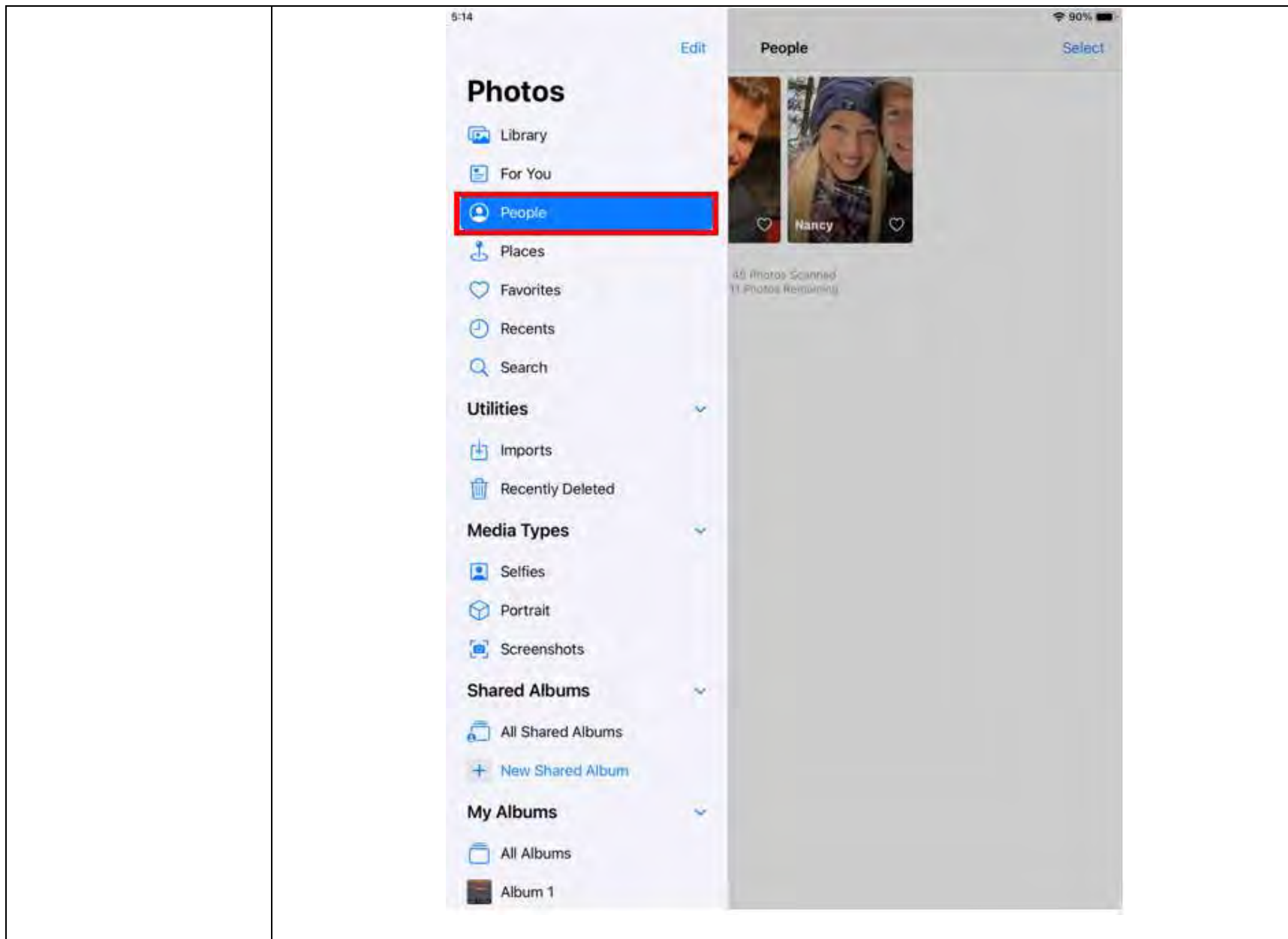


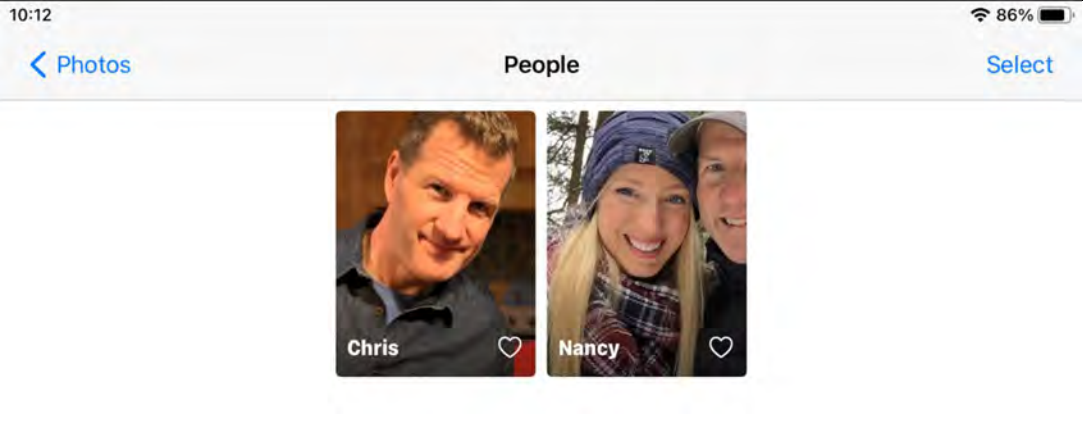
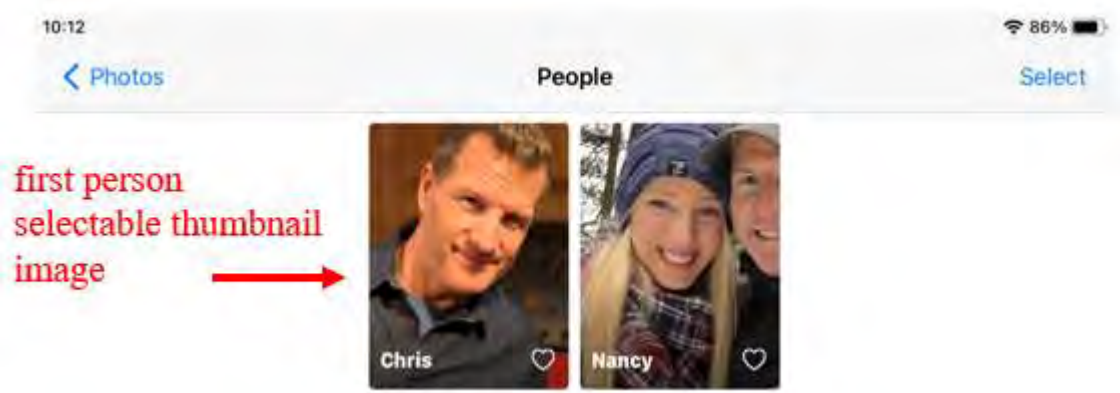
	<p>9:52 <span style="float: right;">87% </span></p> <p><a href="#">← Back</a> <span style="float: right;"><a href="#">Square</a> <a href="#">Select</a> <a href="#">⋮</a></span></p> <p><b>Places</b></p> <p><b>Newaygo</b> &gt; Aug 4, 2019 · Newaygo</p>  <p>← <b>representation of at least a portion of one digital file in a second set of digital files</b></p> <p><b>Newaygo</b> &gt; Nov 1, 2020 · Newaygo</p> 
<p>Each of the digital files in the second set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).</p>	

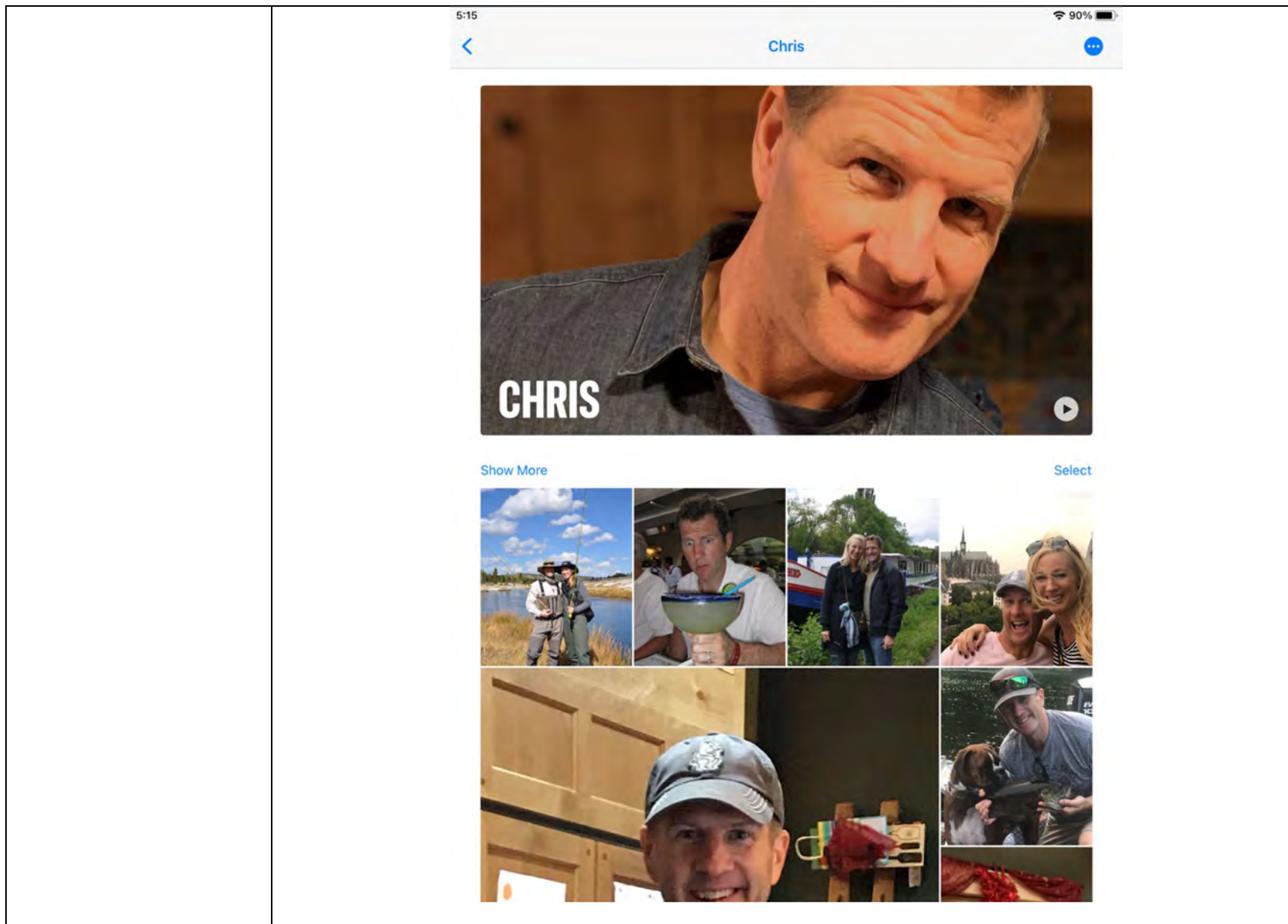
		 <p><b>02C7C6F1-6C4B-4594-A174-5978B01D9164.JPEG</b> JPEG image - 2.7 MB</p> <p><a href="#">OPEN</a></p> <p><b>Information</b> <a href="#">Show Less</a></p> <table><tr><td>Kind</td><td>JPEG image</td></tr><tr><td>Size</td><td>2.7 MB</td></tr><tr><td>Created</td><td>April 16, 2021 at 2:05 AM</td></tr><tr><td>Modified</td><td>April 16, 2021 at 2:05 AM</td></tr><tr><td>Last opened</td><td>September 19, 2021 at 9:46 PM</td></tr><tr><td>Where</td><td><a href="#">On My iPad</a></td></tr><tr><td>Dimensions</td><td>1,770 × 2,105</td></tr><tr><td>Resolution</td><td>72 × 72</td></tr><tr><td>Color profile</td><td>sRGB IEC61966-2.1</td></tr><tr><td>Device make</td><td>Apple</td></tr><tr><td>Device model</td><td>iPhone 7 Plus</td></tr><tr><td>Aperture value</td><td>2.9709</td></tr><tr><td>Exposure time</td><td>1/60</td></tr></table>	Kind	JPEG image	Size	2.7 MB	Created	April 16, 2021 at 2:05 AM	Modified	April 16, 2021 at 2:05 AM	Last opened	September 19, 2021 at 9:46 PM	Where	<a href="#">On My iPad</a>	Dimensions	1,770 × 2,105	Resolution	72 × 72	Color profile	sRGB IEC61966-2.1	Device make	Apple	Device model	iPhone 7 Plus	Aperture value	2.9709	Exposure time	1/60
Kind	JPEG image																											
Size	2.7 MB																											
Created	April 16, 2021 at 2:05 AM																											
Modified	April 16, 2021 at 2:05 AM																											
Last opened	September 19, 2021 at 9:46 PM																											
Where	<a href="#">On My iPad</a>																											
Dimensions	1,770 × 2,105																											
Resolution	72 × 72																											
Color profile	sRGB IEC61966-2.1																											
Device make	Apple																											
Device model	iPhone 7 Plus																											
Aperture value	2.9709																											
Exposure time	1/60																											

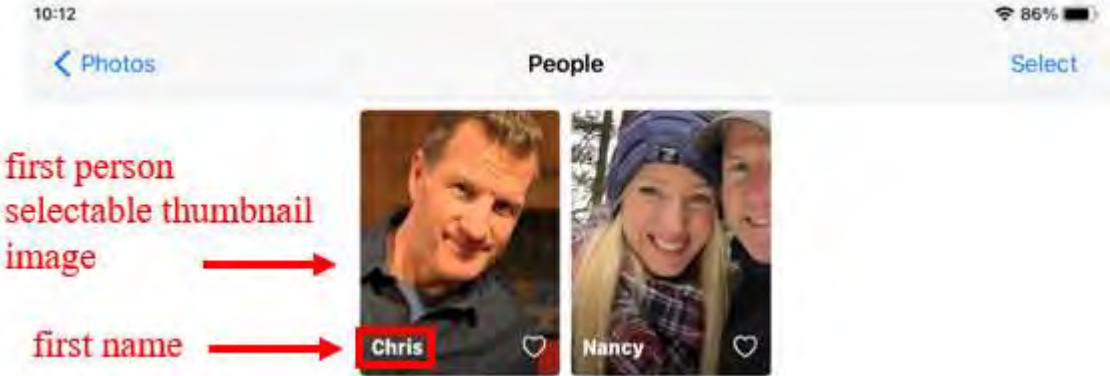
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS

	<p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone 7 Plus (a digital imaging device). The second set of digital files includes digital files associated with the second location.</p>
<p><b>1[d]</b> responsive to a second input that is subsequent to the first input, causing a people view to be displayed on the interface, the people view including:</p>	<p>Responsive to a second input that is subsequent to the first input (e.g., clicking the “People” element), iPadOS displays a people view on the interface.</p>



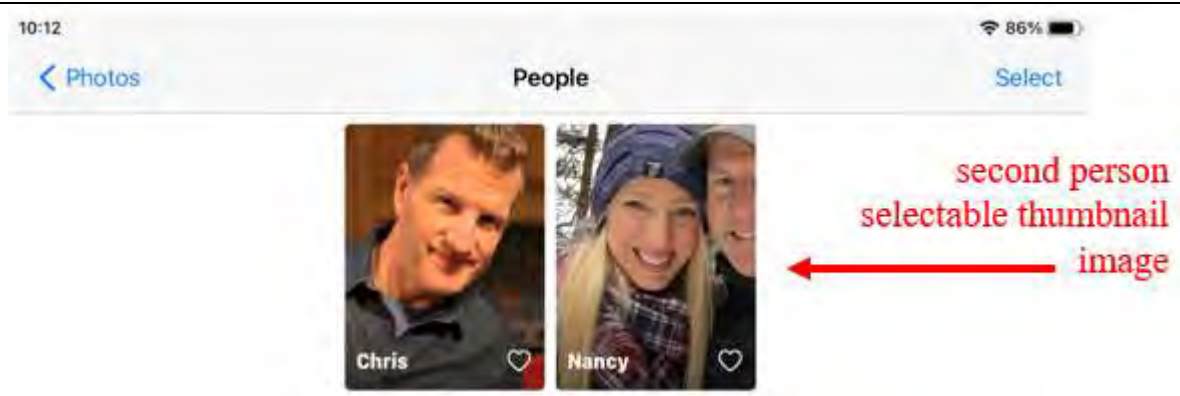
	 <p>A screenshot of the 'People' view in the Photos app. At the top, there is a navigation bar with a back arrow labeled 'Photos', the title 'People', and a 'Select' button. Below the navigation bar are two portrait thumbnails. The first thumbnail is labeled 'Chris' and has a heart icon below it. The second thumbnail is labeled 'Nancy' and also has a heart icon below it. The status bar at the top shows the time as 10:12 and battery level at 86%.</p>
<p><b>1[d][i]</b> (i) a first person selectable thumbnail image including a representation of a face of a first person, the first person being associated with a third set of digital files including digital photographs and videos;</p>	<p>The people view includes a first person selectable thumbnail image including a representation of a face of a first person.</p>  <p>A screenshot of the 'People' view in the Photos app, identical to the one above. A red arrow points from the text 'first person selectable thumbnail image' to the 'Chris' thumbnail. The text is in red and bold. The rest of the screenshot is the same as the one above.</p> <p>The first person is associated with a third set of digital files including digital photographs and videos.</p>



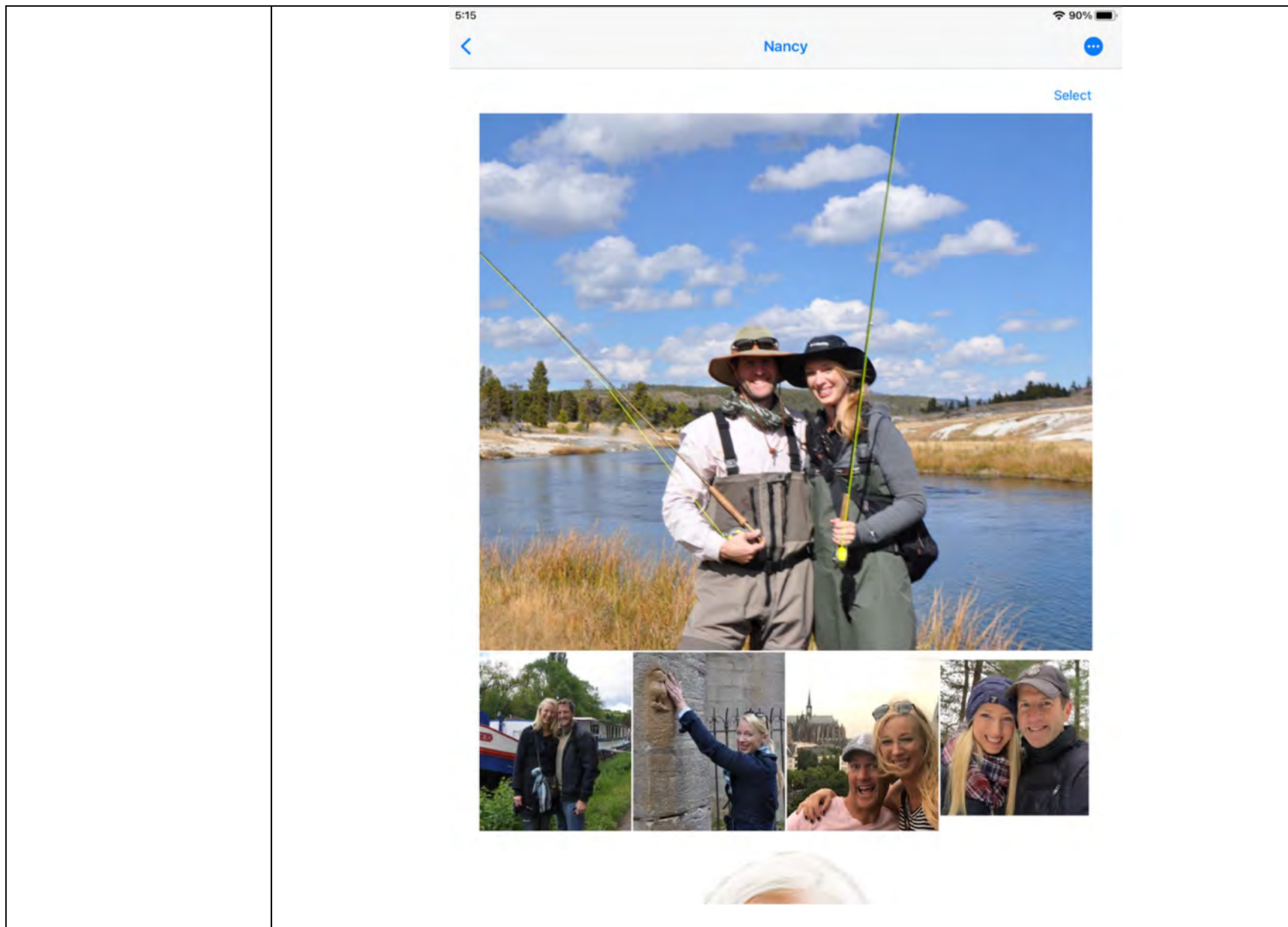
<p><b>1[d][iii]</b> (ii) a first name associated with the first person, the first name being displayed adjacent to the first person selectable thumbnail image;</p>	<p>The people view includes a first name associated with the first person displayed adjacent to the first person selectable thumbnail image.</p>  <p>To the extent it is found that the first name associated with the first person is not literally displayed adjacent to the first person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name associated with the first person is to communicate the name of the first person that is associated with the first person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the first name associated with the first person in sufficient proximity to the first person selectable thumbnail image such that a user will associate the first name associated with the first person with the first person selectable thumbnail image. The result of the claimed displaying is that the first name is associated with the first person selectable thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>1[d][iii]</b> (iii) a second person selectable thumbnail image including a representation of a face of a second person, the second person being</p>	<p>The people view includes a second person selectable thumbnail image including a representation of a face of a second person.</p>

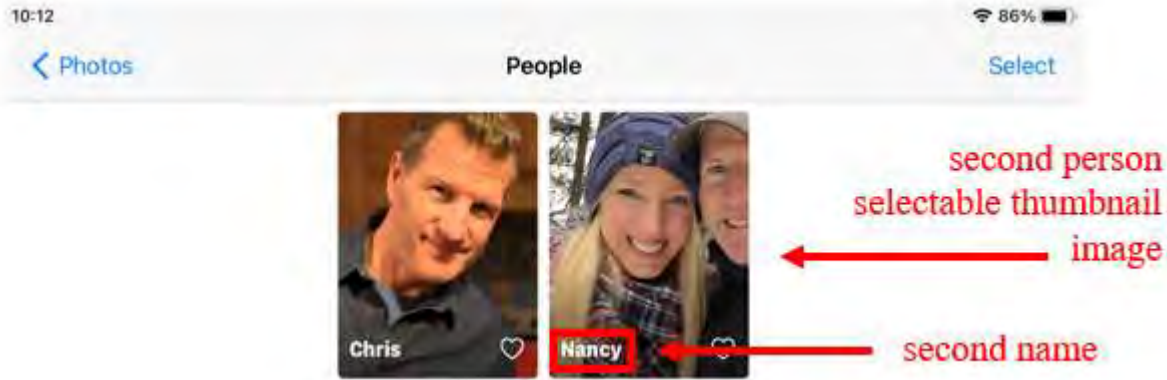



associated with a fourth set of digital files including digital photographs and videos; and



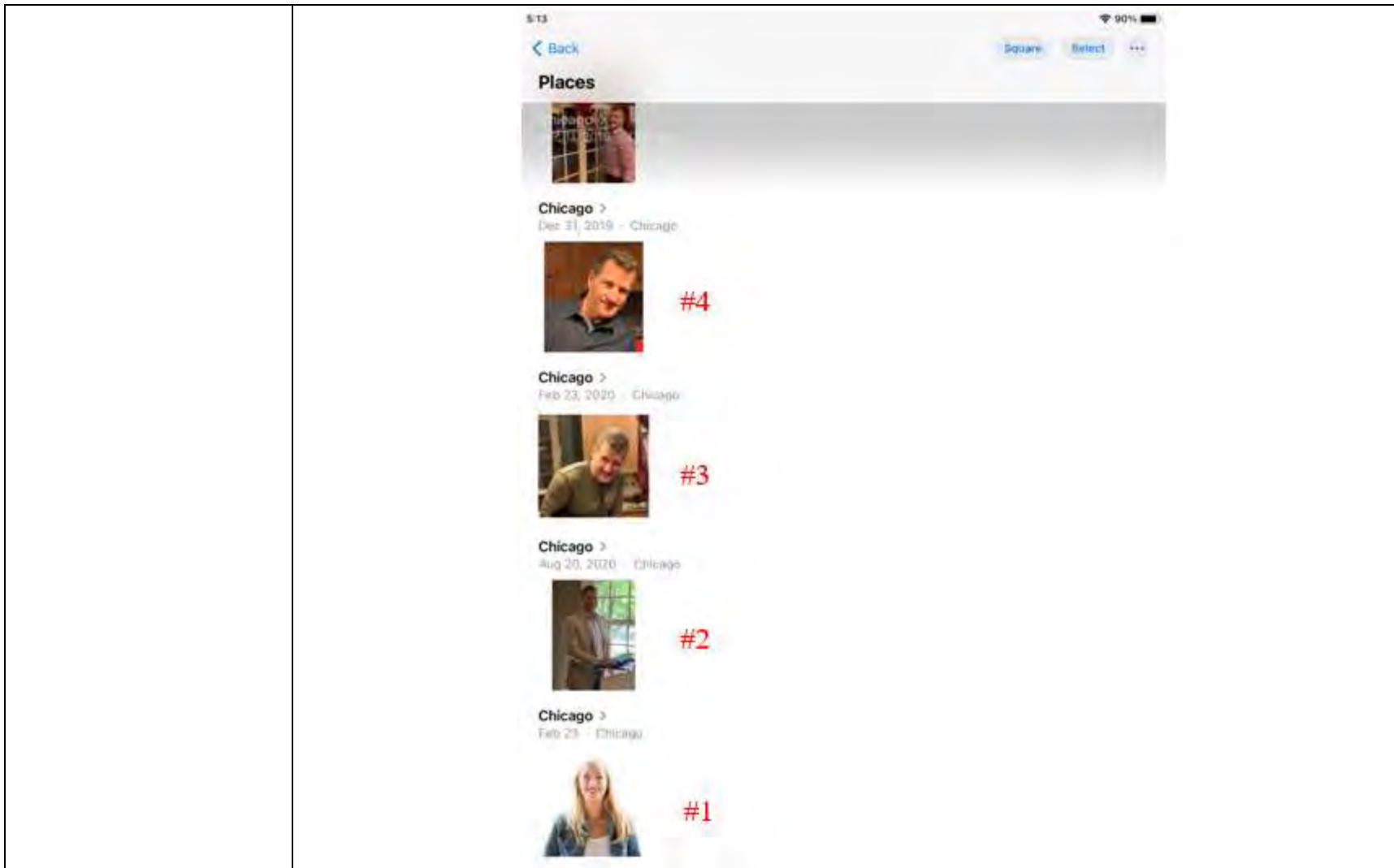
The second person is associated with a fourth set of digital files including digital photographs and videos.

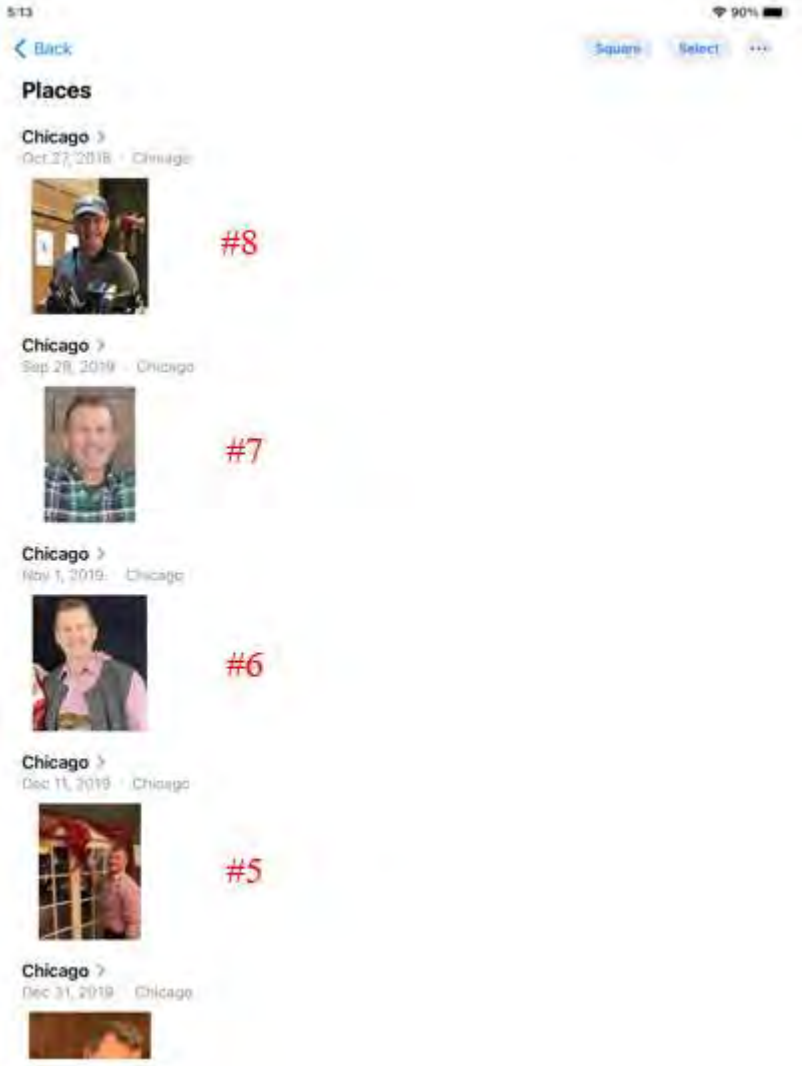



<p><b>1[d][iv]</b> (iv) a second name associated with the second person, the second name being displayed adjacent to the second person selectable thumbnail image.</p>	<p>The people view also includes a second name associated with the second person. The second name being displayed adjacent to the second person selectable thumbnail image. <i>See</i> information for element 1[d][ii].</p>  <p>To the extent it is found that the second name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name associated with the second person is to communicate the name of the second person that is associated with the second person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the second name associated with the second person in sufficient proximity to the second person selectable thumbnail image such that a user will associate the second name associated with the second person with the second person selectable thumbnail image. The result of the claimed displaying is that the second name is associated with the second person selectable thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>2[pre]</b> The method of claim 1, wherein</p>	<p><i>See</i> information for claim 1.</p>
<p><b>2[a]</b> the map view further includes a first indication feature</p>	<p>The map view includes a first indication feature associated with the first location selectable thumbnail image.</p>

<p>associated with the first location selectable thumbnail image</p>	 <p>The image shows a map of the Chicago area with three location markers. Marker 3 is at Twin Lakes with a thumbnail of a table with flowers. Marker 4 is at Lake with a thumbnail of a pig. Marker 8 is at Waukegan with a thumbnail of a woman. Red arrows point from text labels to markers 8 and 4.</p>
<p><b>2[b]</b> the first indication feature being based on a number of digital files in the first set of digital files in the first set of digital files.</p>	<p>The first indication feature is based on a number of digital files in the first set of digital files. In the example below, the first indication feature includes the number 8 and the first set of digital files includes 8 digital files.</p>



Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS






	 <p>The screenshot shows a mobile interface titled 'Places' with a 'Back' button. Below the title, there are five entries for 'Chicago'. Each entry consists of a date, the location name, and a thumbnail image. Red handwritten numbers are placed to the right of each thumbnail: #8 for the first (Oct 27, 2018), #7 for the second (Sep 28, 2018), #6 for the third (Nov 1, 2018), and #5 for the fourth (Dec 11, 2018). The fifth entry (Dec 31, 2018) has a thumbnail but no number. At the top right of the screen, there are 'Square', 'Select', and a three-dot menu icon.</p>
<p><b>3.</b> The method of claim 2, wherein the first indication feature is</p>	<p>As shown below, the first indication feature is connected to the first location selectable thumbnail image.</p>

<p>connected to the first location selectable thumbnail image.</p>	
<p><b>4.</b> The method of claim 2, wherein the first indication feature includes a first number indicative of the number of digital files in the first set of digital files.</p>	<p>The first indication feature includes a first number indicative of the number of digital files in the first set of digital files. As discussed above for limitation 2[b], in the illustrated example, the first indication feature includes the number 8 and the first set of digital files includes 8 digital files.</p>



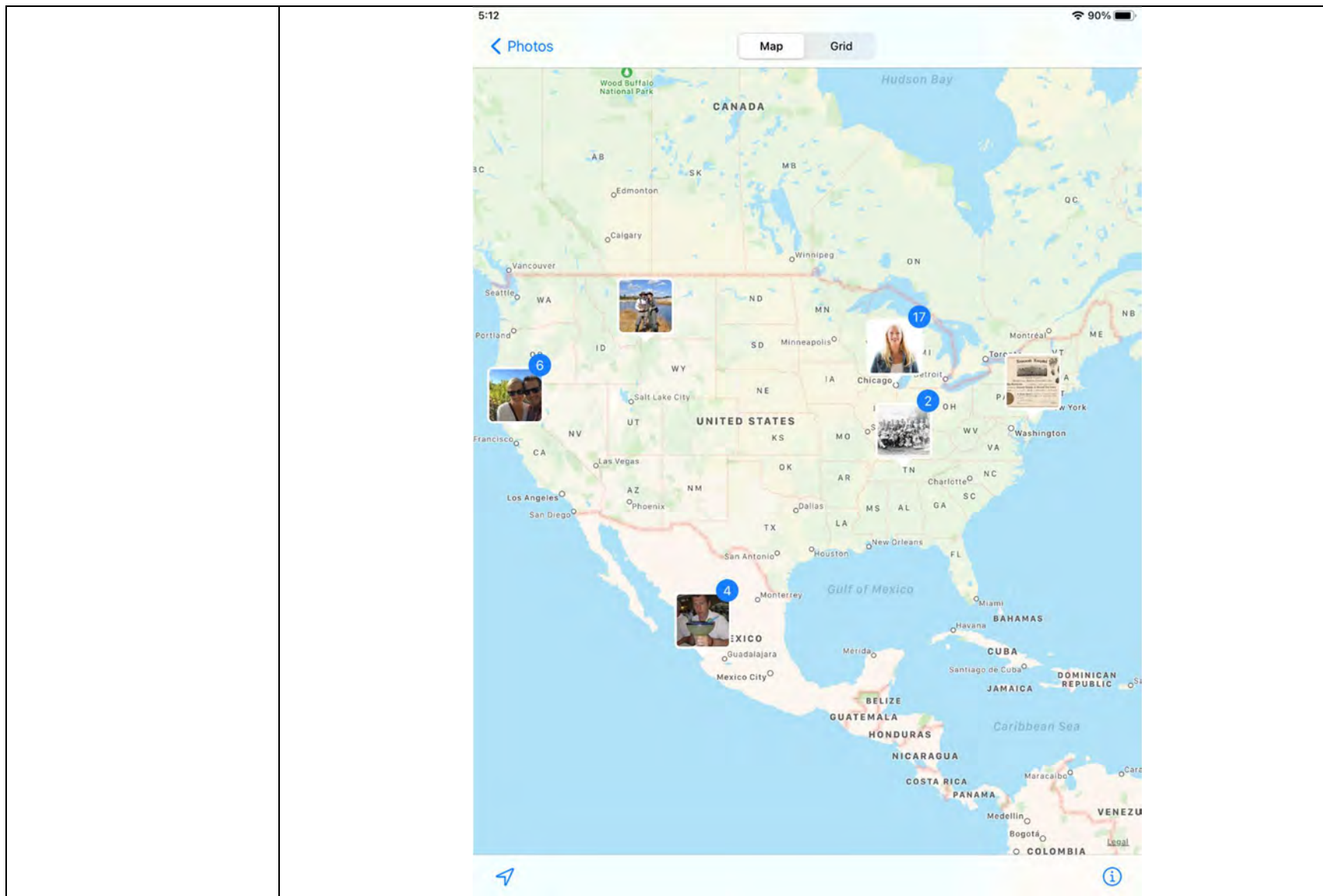
	 <p>A map view showing a region including Chicago, Waukegan, and Lake. Three location-selectable thumbnail images are overlaid on the map, each with a blue circular callout containing a number. Callout 3 points to a thumbnail of a dining table. Callout 4 points to a thumbnail of a pig. Callout 8 points to a thumbnail of a woman. Red arrows point from text labels to callout 8 and the woman thumbnail. The labels are 'first indication feature' and 'first location selectable thumbnail image'.</p>
<p><b>5[a]</b> The method of claim 2, wherein the map view further includes a second indication feature associated with the second location selectable thumbnail image,</p>	<p>The map view also includes a second indication feature associated with the second location selectable thumbnail image.</p>  <p>A map view showing a region including Big Rapids. A second location-selectable thumbnail image of a couple is overlaid on the map, with a blue circular callout containing the number 2. Red arrows point from text labels to callout 2 and the couple thumbnail. The labels are 'second indication feature' and 'second location selectable thumbnail image'.</p>

<p><b>5[b]</b> the second indication feature being based on a number of digital files in the second set of digital files.</p>	<p>The second indication feature is based on a number of digital files in the second set of digital files. In the example below, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p>  <p>The screenshot shows an iPadOS gallery interface. At the top, the time is 9:52 and the battery is at 87%. There are navigation buttons for 'Back', 'Square', 'Select', and a menu icon. Below the navigation is a section titled 'Places' with a sub-section 'Newygo &gt;'. Under 'Newygo', there are two photo thumbnails. The first thumbnail is labeled with a red '#2' and the second with a red '#1'. The dates 'Aug 4, 2019' and 'Nov 1, 2020' are visible next to the photos.</p>
<p><b>6.</b> The method of claim 5, wherein the second indication feature is connected to the second location selectable thumbnail image.</p>	<p>As shown below, the second indication feature is connected to the second location selectable thumbnail image.</p>

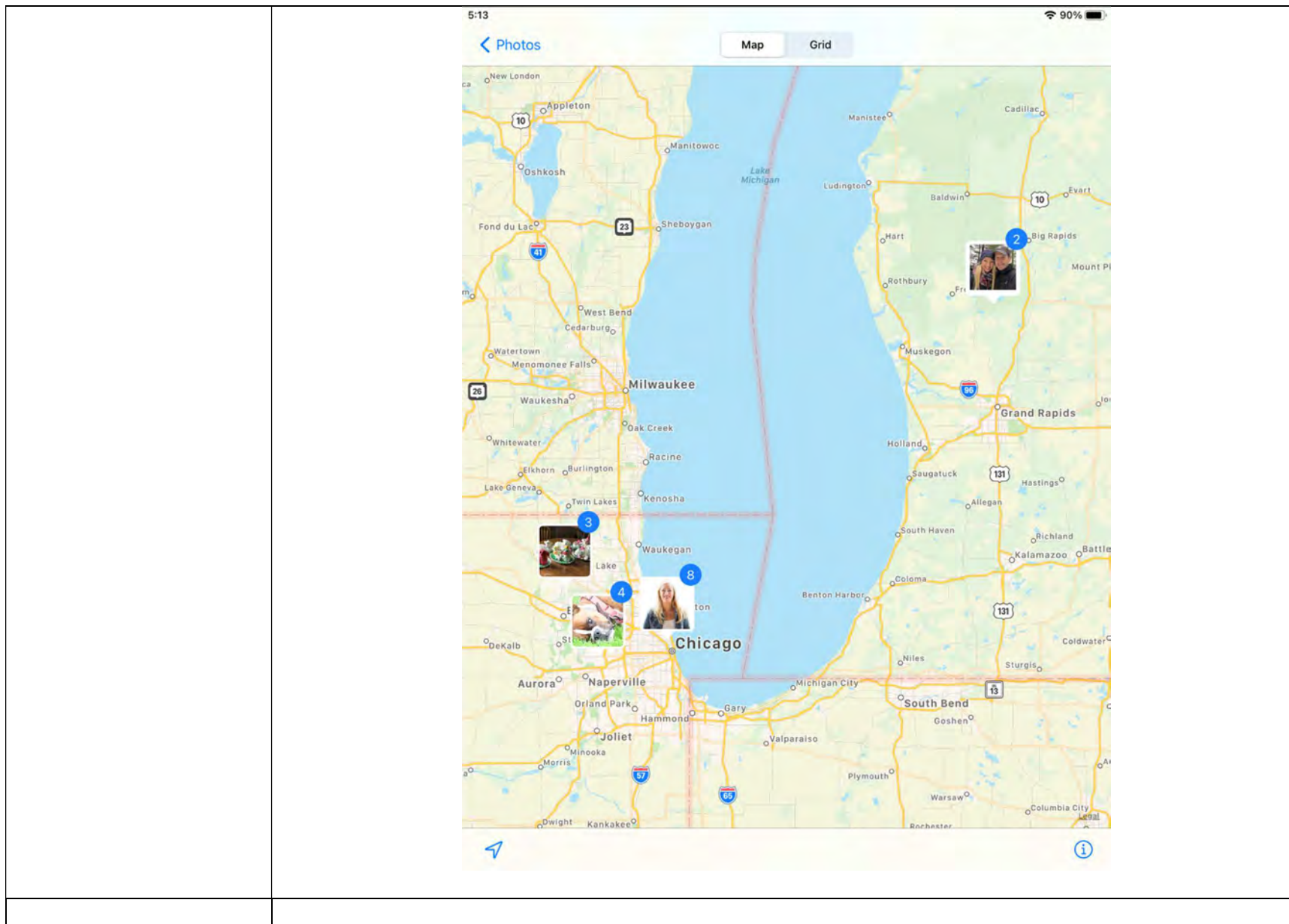
	
<p>7. The method of claim 5, wherein the second indication feature includes a second number indicative of the number of digital files in the second set of digital files.</p>	<p>The second indication feature includes a second number indicative of the number of digital files in the second set of digital files. As discussed above for limitation 5[b], in the illustrated example, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p> 

<p><b>8.</b> The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming in on the interactive map, modifying the first indication feature.</p>	<p>Subsequent to the map view being displayed on the interface, iPadOS modifies the first indication feature responsive to an input that is indicative of zooming in on the interactive map. In the example below, the first indication feature initially includes the number 17 when the map view is displayed, which is then modified responsive to zooming in.</p>

Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS



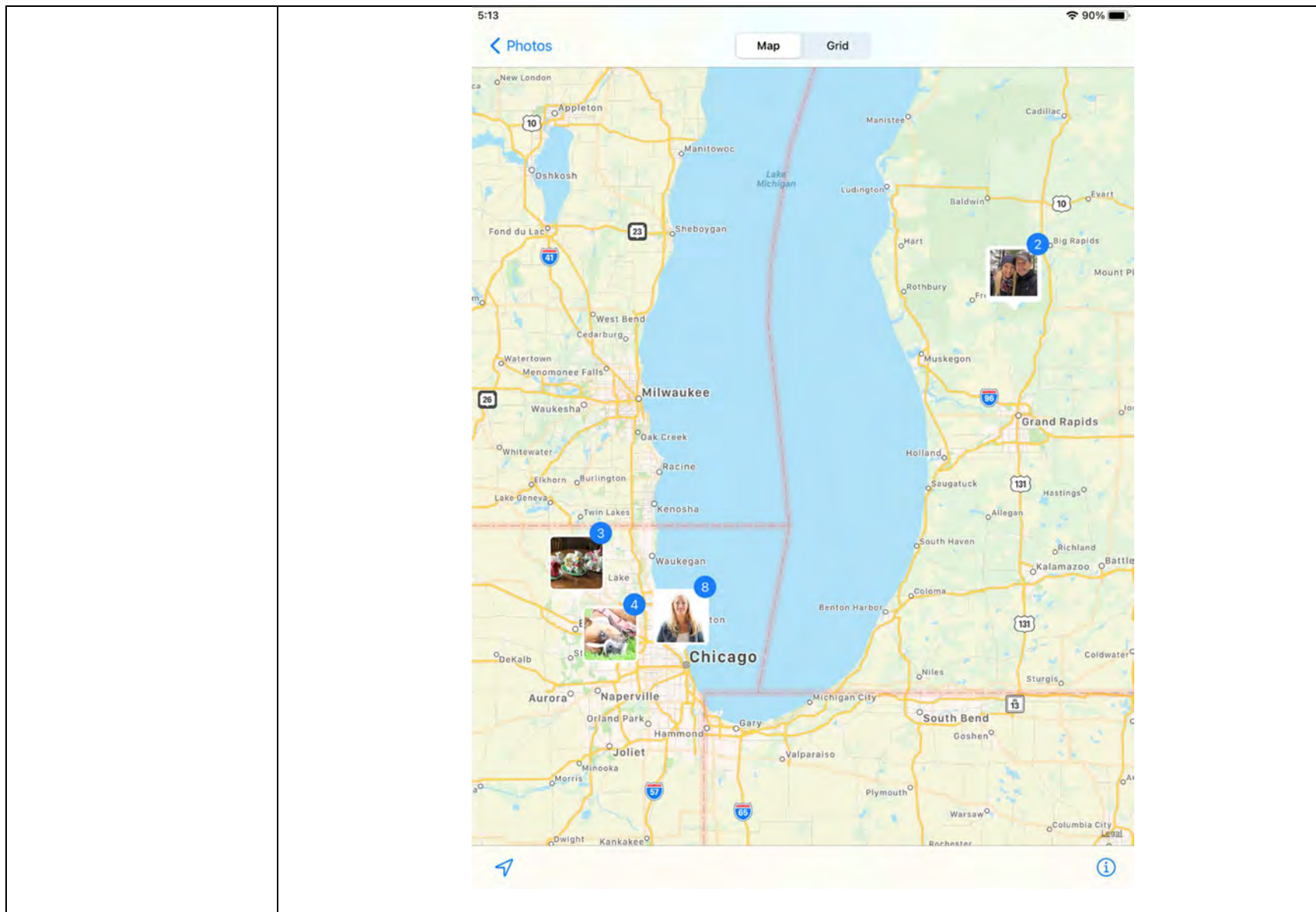
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS



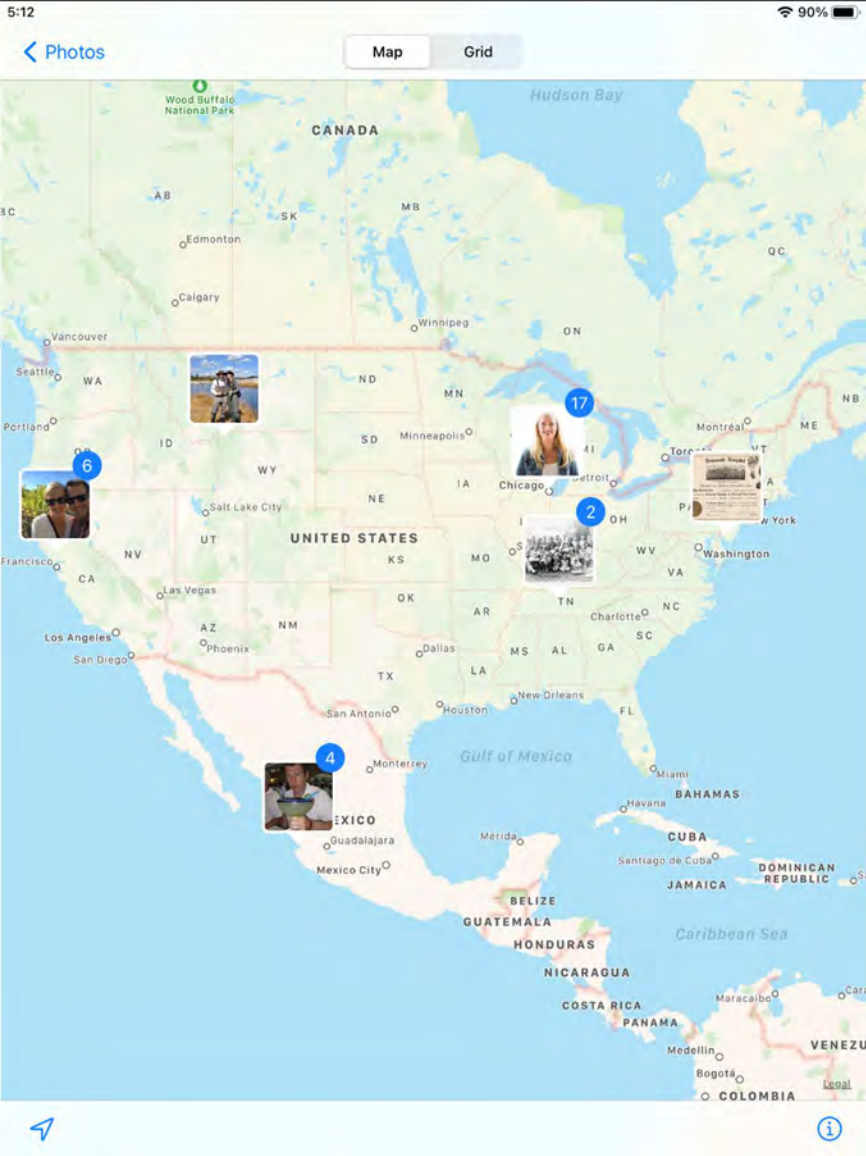
<p>9. The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming out on the interactive map, modifying the first indication feature.</p>	<p>Subsequent to the map view being displayed on the interface, iPadOS modifies the first indication feature responsive to an input that is indicative of zooming out on the interactive map. In the example below, the second indication feature is used as an illustrative example where the indication changes from 8 to 17 responsive to zooming out on the interactive map.</p>
--	--



Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS

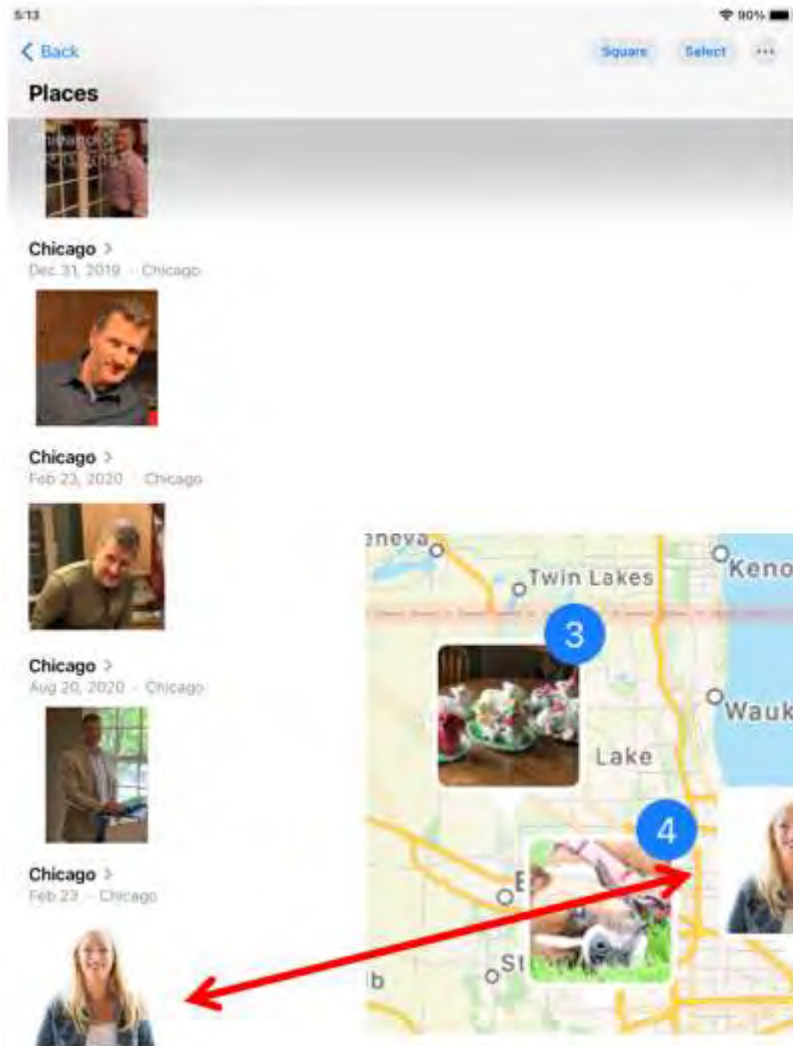


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS

	
<p><b>12[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>

**12[a]** the first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files, and

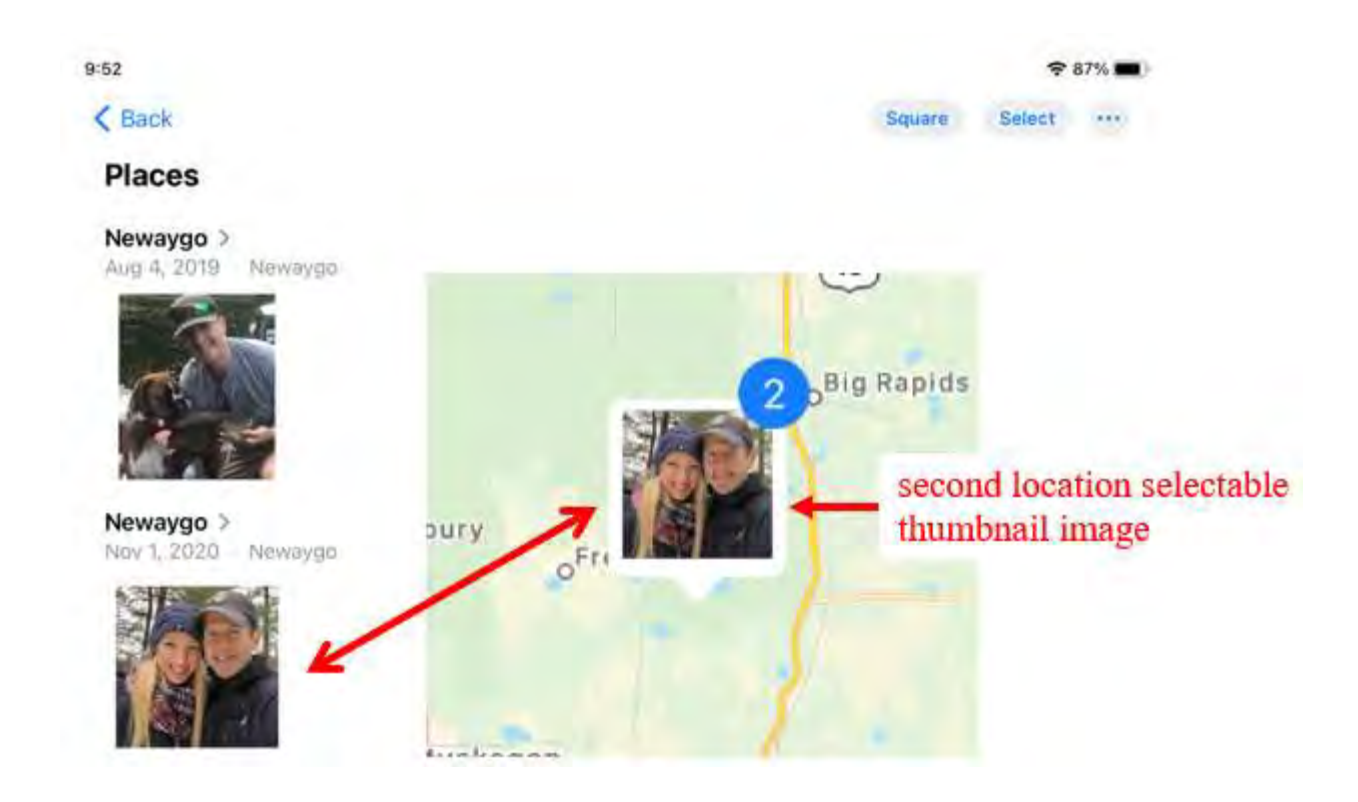
The first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files.



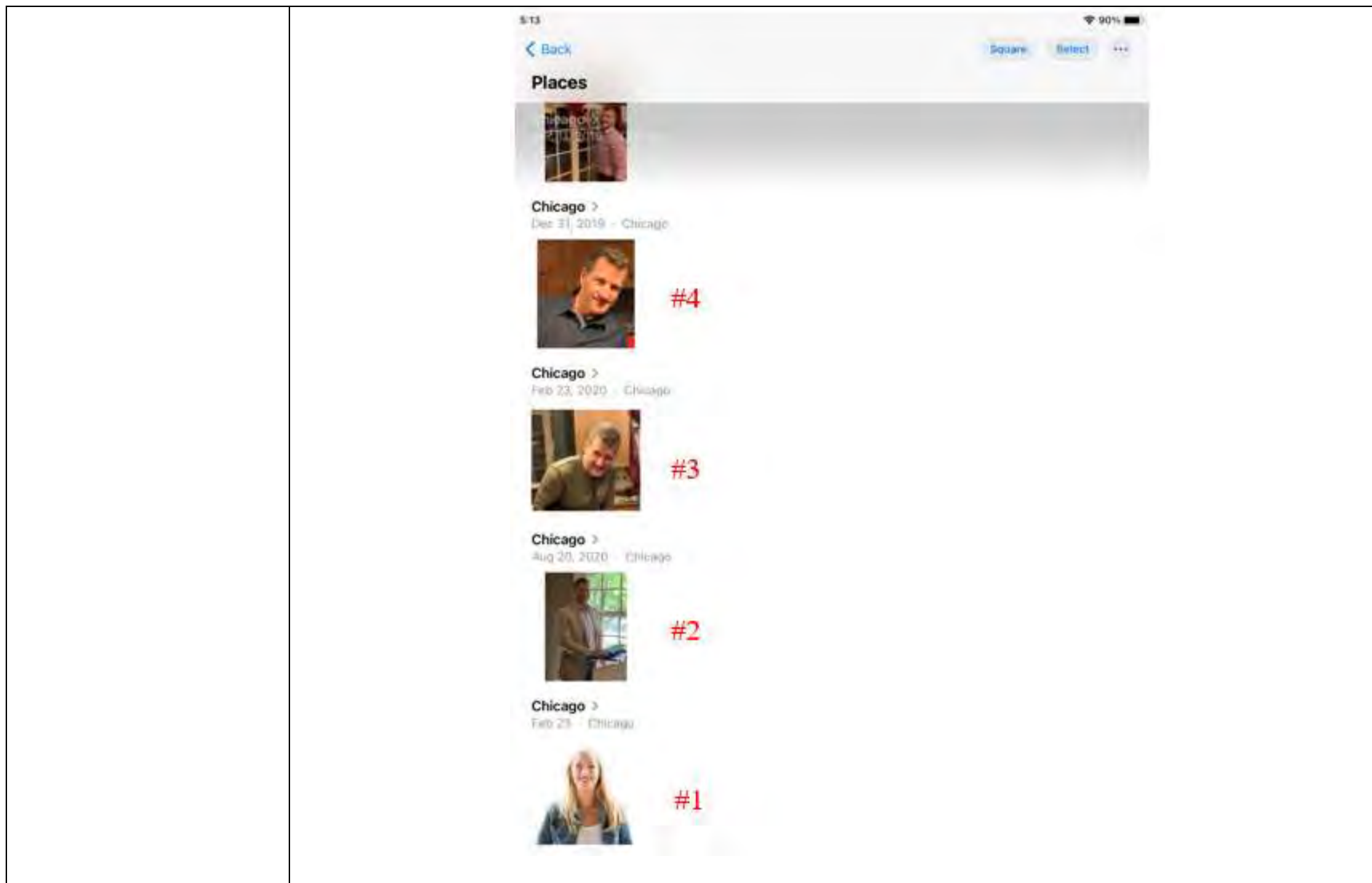
first location selectable thumbnail image

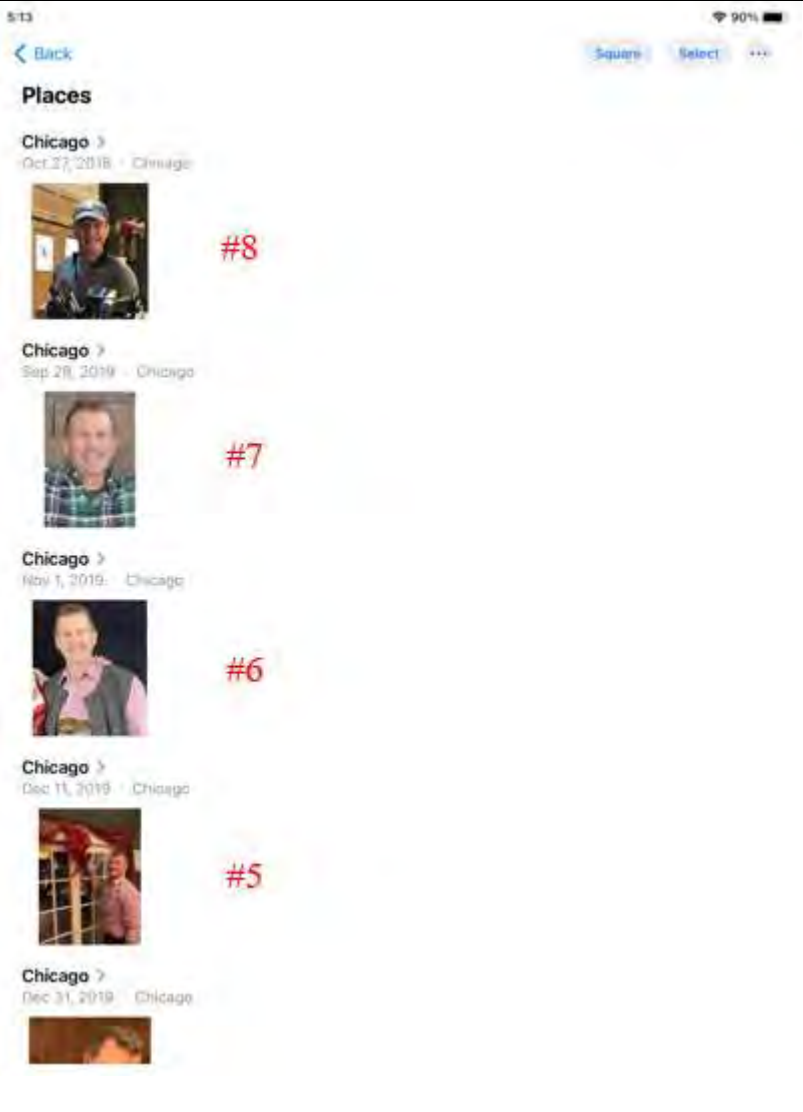
**12[b]** wherein the second location

The second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.

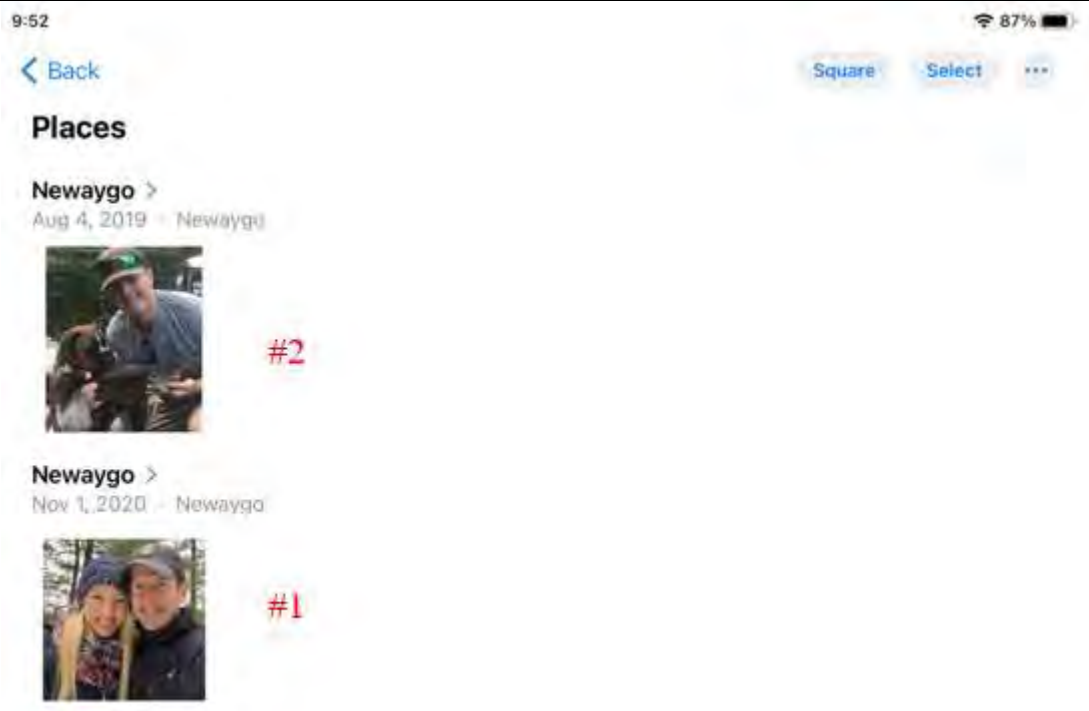
<p>selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.</p>	 <p>The screenshot shows an iPadOS gallery interface. At the top, there is a status bar with the time 9:52, a back arrow, and battery level at 87%. Below the status bar are buttons for 'Square', 'Select', and a menu icon. The main content is a 'Places' section with two photo thumbnails. The first thumbnail is dated 'Aug 4, 2019' and the second is dated 'Nov 1, 2020'. A map view is overlaid on the right, showing a location marker '2' near 'Big Rapids'. A red arrow points from the second photo thumbnail to the map marker. A red text box with the text 'second location selectable thumbnail image' has an arrow pointing to the map marker.</p>
<p><b>14[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>14[a]</b> the first location view includes a representation of at least a portion of all of the digital files in the first set of digital files and</p>	<p>The first location view includes a representation of at least a portion of all of the digital files in the first set of digital files (in this example, 8).</p>

Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS



	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button on the left and 'Square', 'Select', and a three-dot menu on the right. The main content is a list of photos from a location named 'Chicago'. Each photo entry includes the location name, a date, and a photo thumbnail. Red annotations are placed to the right of the thumbnails: '#8' next to the top photo (dated Oct 27, 2018), '#7' next to the second photo (dated Sep 28, 2018), '#6' next to the third photo (dated Nov 1, 2018), and '#5' next to the fourth photo (dated Dec 11, 2018). A fifth photo (dated Dec 31, 2018) is partially visible at the bottom.</p>
<p><b>14[b]</b> the second location view includes a representation of at least a portion of all of the</p>	<p>The second location view includes a representation of at least a portion of all of the digital files in the second set of digital files (in this example, 2).</p>

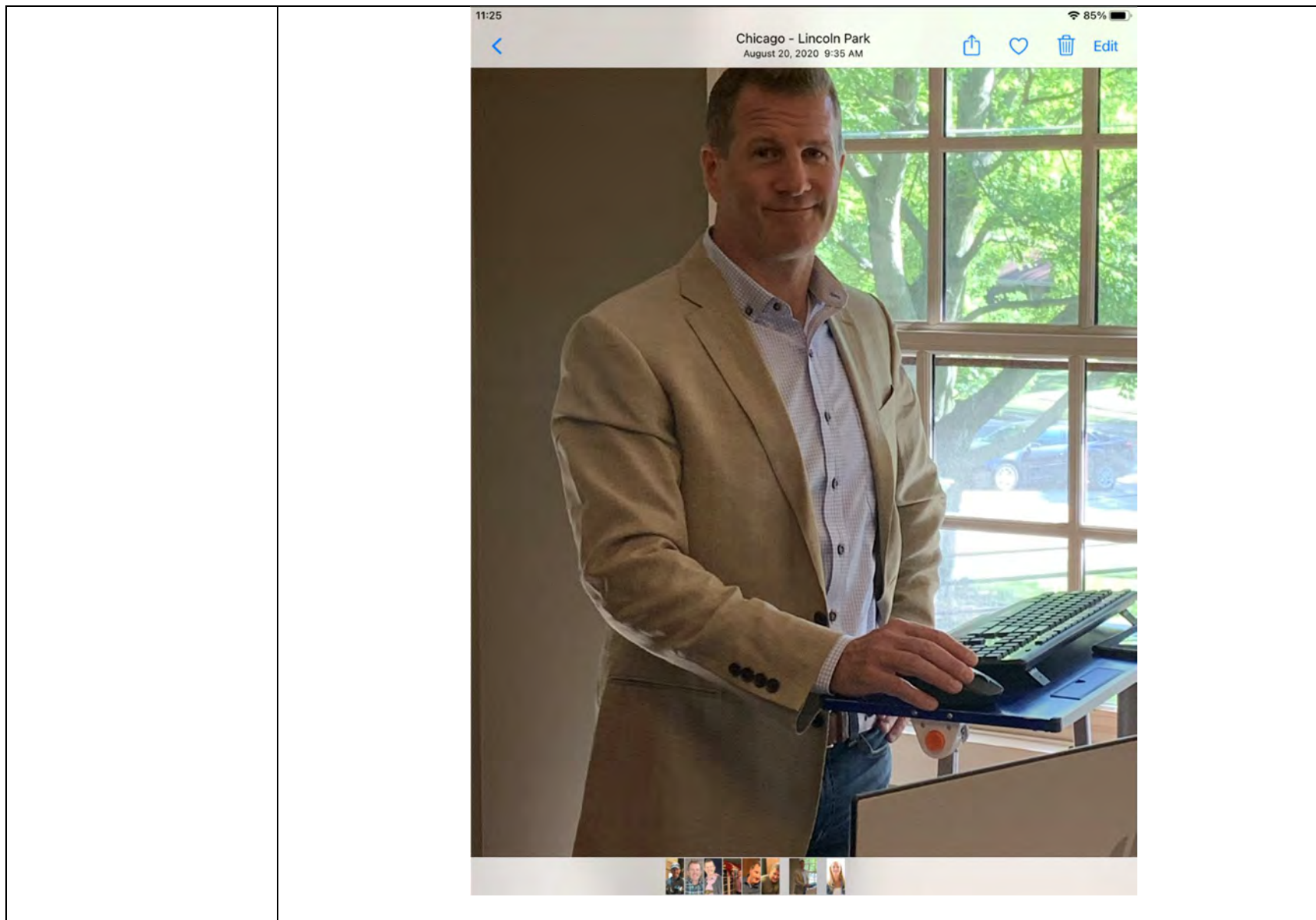


<p>digital files in the second set of digital files.</p>	
<p><b>15[pre]</b> The method of claim 1, further comprising:</p>	<p><i>See information for claim 1.</i></p>
<p><b>15[a]</b> responsive to an input that is indicative of a selection, in the first location view, of the representation of the at least a portion of the one digital file in the first set of digital files, causing a first digital file to be</p>	<p>Responsive to an input that is indicative of a selection, in the first location view, of the representation of the at least a portion of the one digital file in the first set of digital files, iPadOS displays a first digital file on the interface.</p>



displayed on the interface; and






**15[b]** responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital files, causing a second digital file to be displayed on the interface.

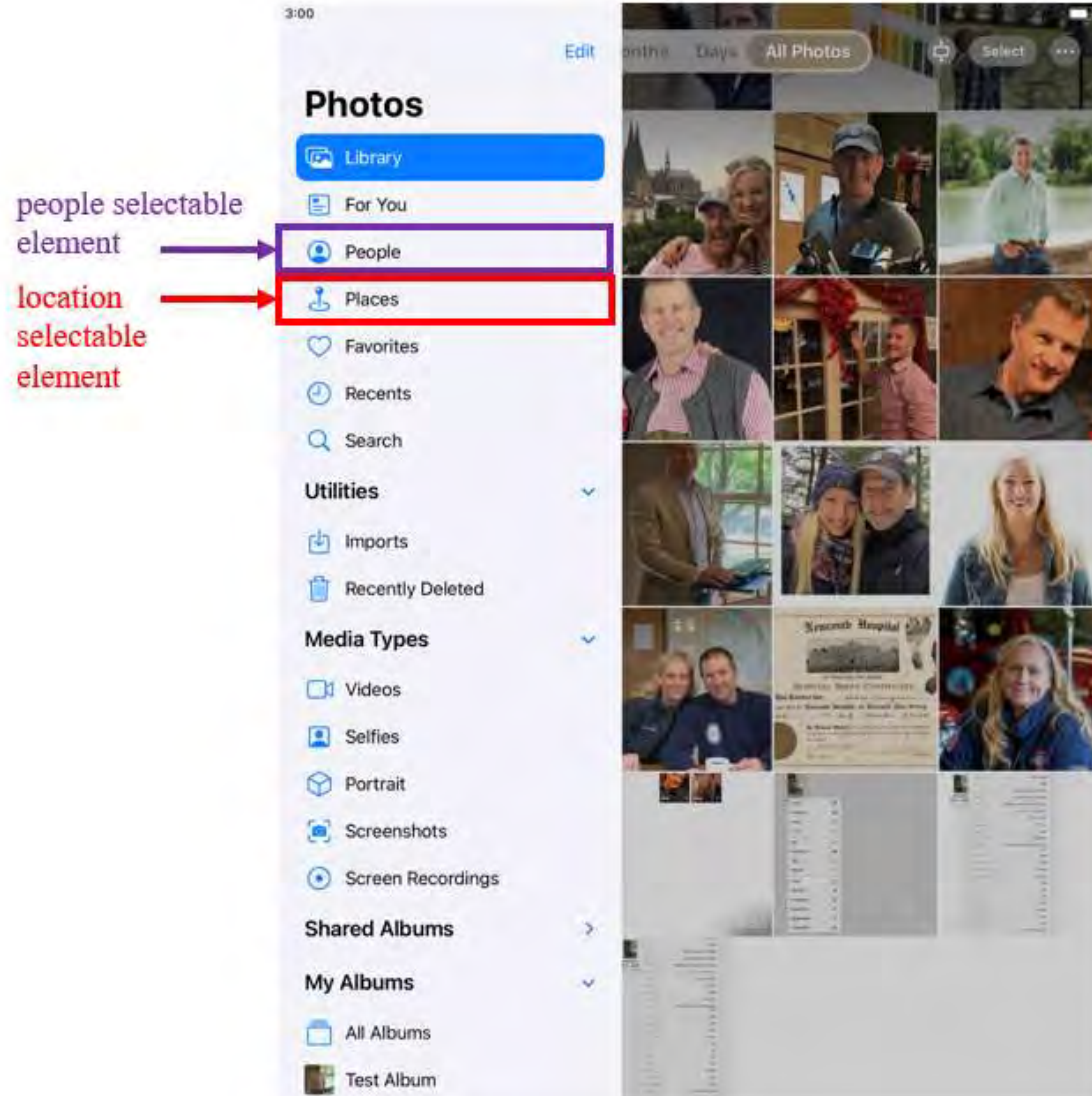
Responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital files, iPadOS displays a second digital file on the interface.



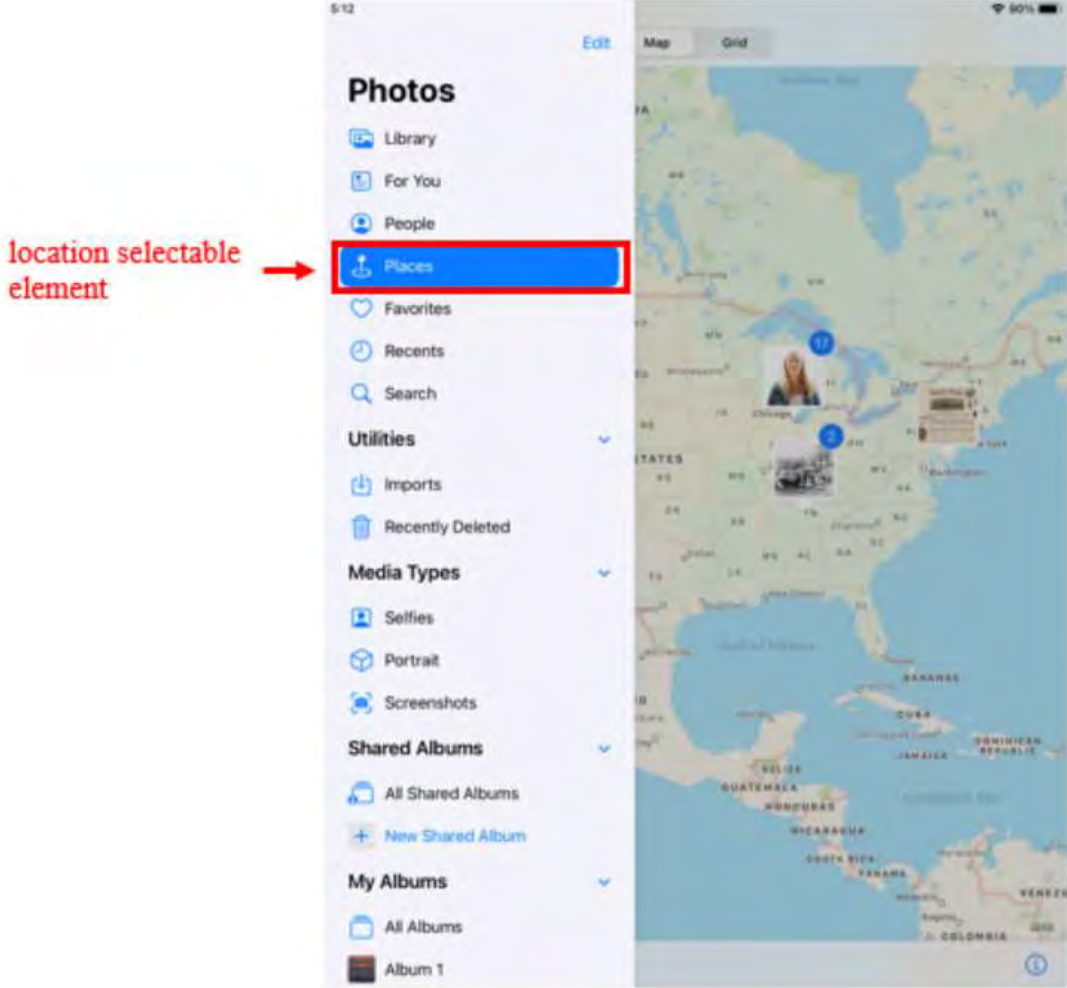
	
<p><b>17[pre]</b> The method of claim 1, further comprising,</p>	<p><i>See information for claim 1.</i></p>

**17[a]** prior to receiving the first input, causing the interface to display a plurality of selectable elements, the plurality of selectable elements including a location selectable element and a people selectable element,

Prior to receiving the first input (see information for element 1[a]), iPadOS displays a plurality of selectable elements on the interface. The plurality of selectable elements includes a location selectable element and a people selectable element.

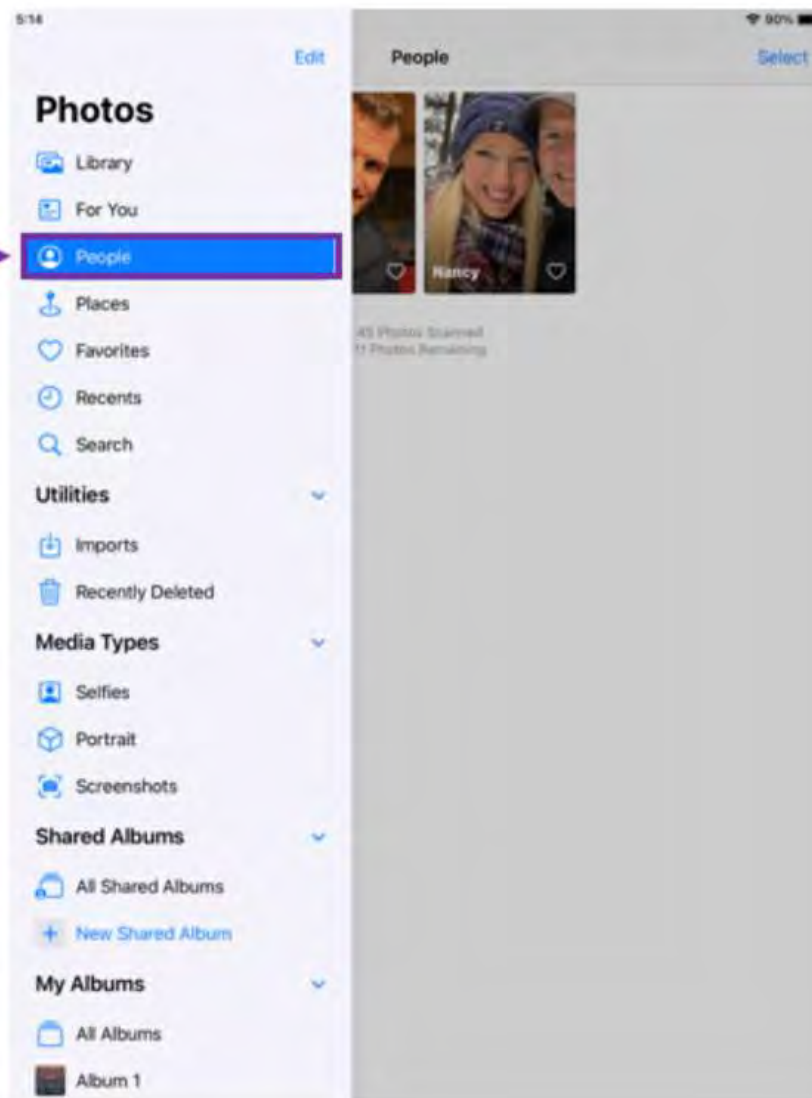




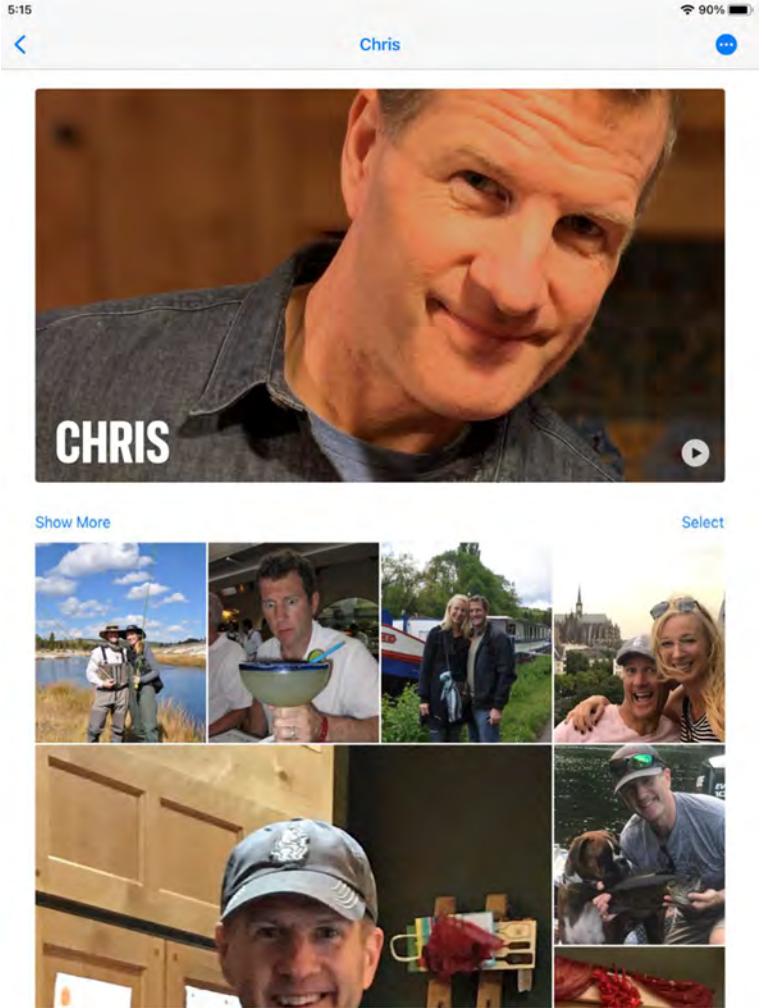
<p><b>17[b]</b> wherein the first input is indicative of a selection of the location selectable element, and</p>	<p>The first input is indicative of a selection of the location selectable element.</p>  <p>location selectable element</p>
<p><b>17[c]</b> wherein the second input is indicative of a</p>	<p>The second input is indicative of a selection of the people selectable element.</p>

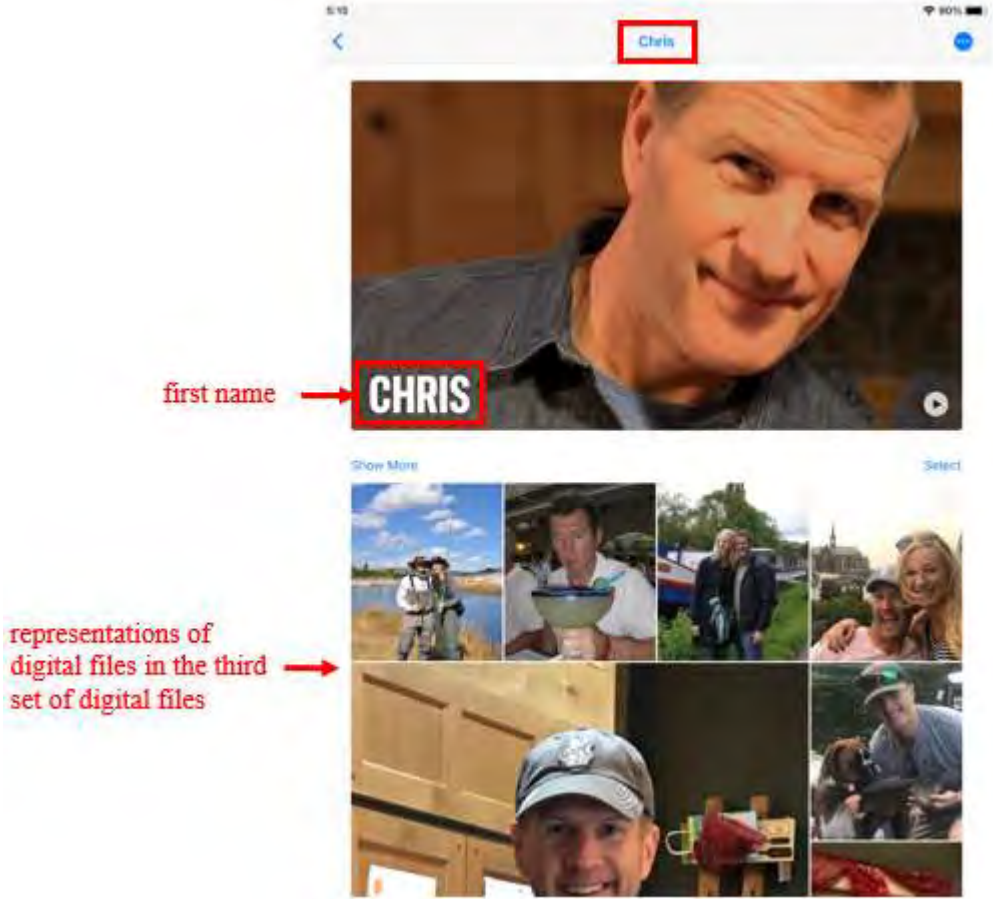
selection of the people selectable element.

people selectable element





<p><b>18[pre]</b> The method of claim 1, further comprising</p>	<p>See information for claim 1.</p>
<p><b>18[a]</b> responsive to an input that is indicative of a selection of the first person selectable thumbnail image, causing a first person view to be displayed on the interface, the first person view including</p>	<p>Responsive to an input that is indicative of a selection of the first person selectable thumbnail image, iPadOS displays a first person view on the interface.</p> 

<p><b>18[b]</b> (i) the first name and (ii) a representation of each digital file in the third set of digital files.</p>	<p>The first person view includes the first name and a representation of each digital file in the third set of digital files.</p> 
<p><b>19[pre]</b> The method of claim 18, further comprising</p>	<p>See information for claim 18.</p>
<p><b>19[a]</b> responsive to an input that is indicative of</p>	<p>Responsive to an input that is indicative of a selection of the second person selectable thumbnail image, iPadOS displays a second person view on the interface.</p>

a selection of the second person selectable thumbnail image, causing a second person view to be displayed on the interface, the second person view including



**19[b]** (i) the second name and (ii) a representation of each

The second person view includes the second name and a representation of each digital file in the fourth set of digital files.

digital file in the fourth set of digital files.



# **Exhibit C.3**

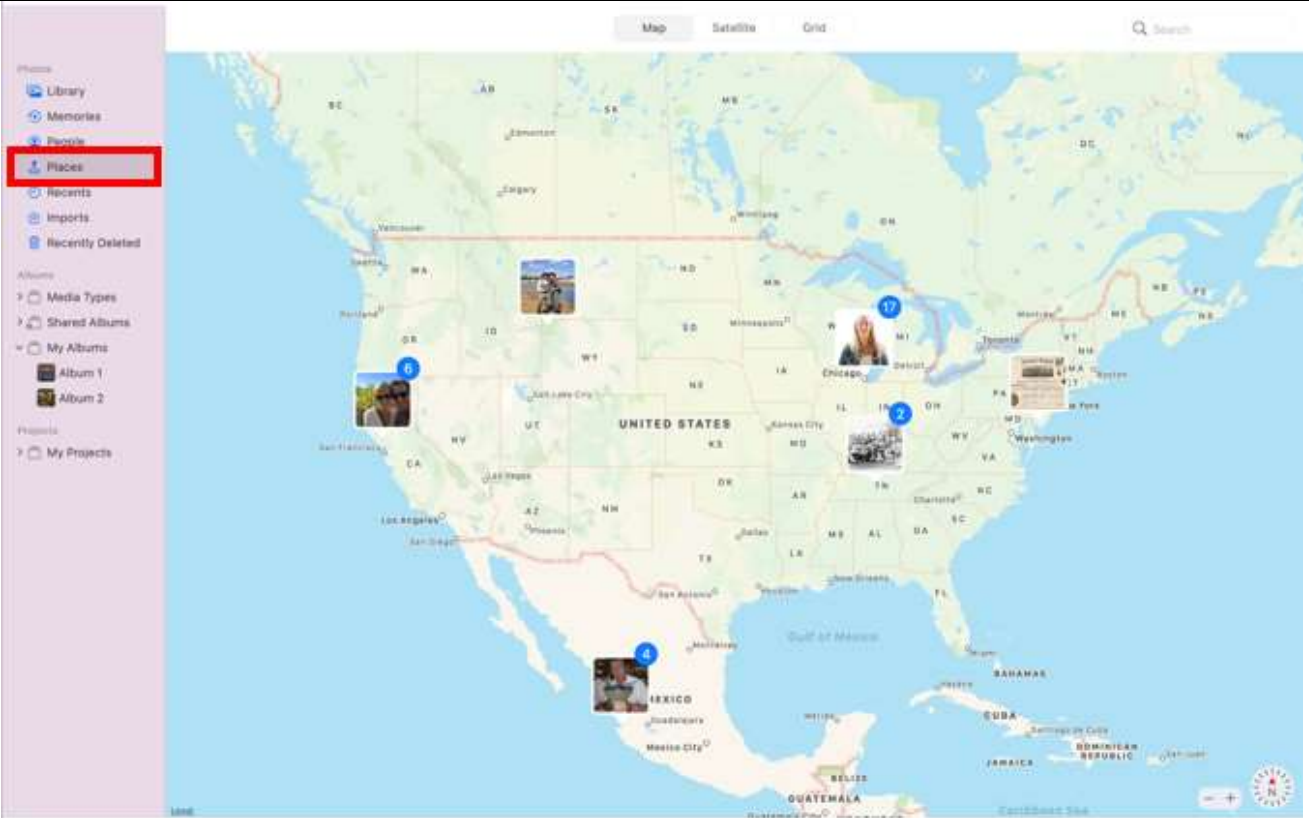
**U.S. Patent No. 10,621,228 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,621,228 (“the ‘228 patent”) in Apple macOS (including the Photos application). The exemplary screenshots below were taken using an Apple MacBook Pro running macOS 11.5.2 and Photos Version 6.0 (361.0.100). While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<b>1[pre]</b> A method comprising:	To the extent the preamble is limiting, macOS 11 performs a method, as detailed below.
<b>1[a]</b> responsive to a first input, causing a map view to be displayed on an interface, the map view including:	Responsive to a first input (e.g., clicking the “Places” element), macOS displays a map view on an interface (e.g., an Apple MacBook or Mac).

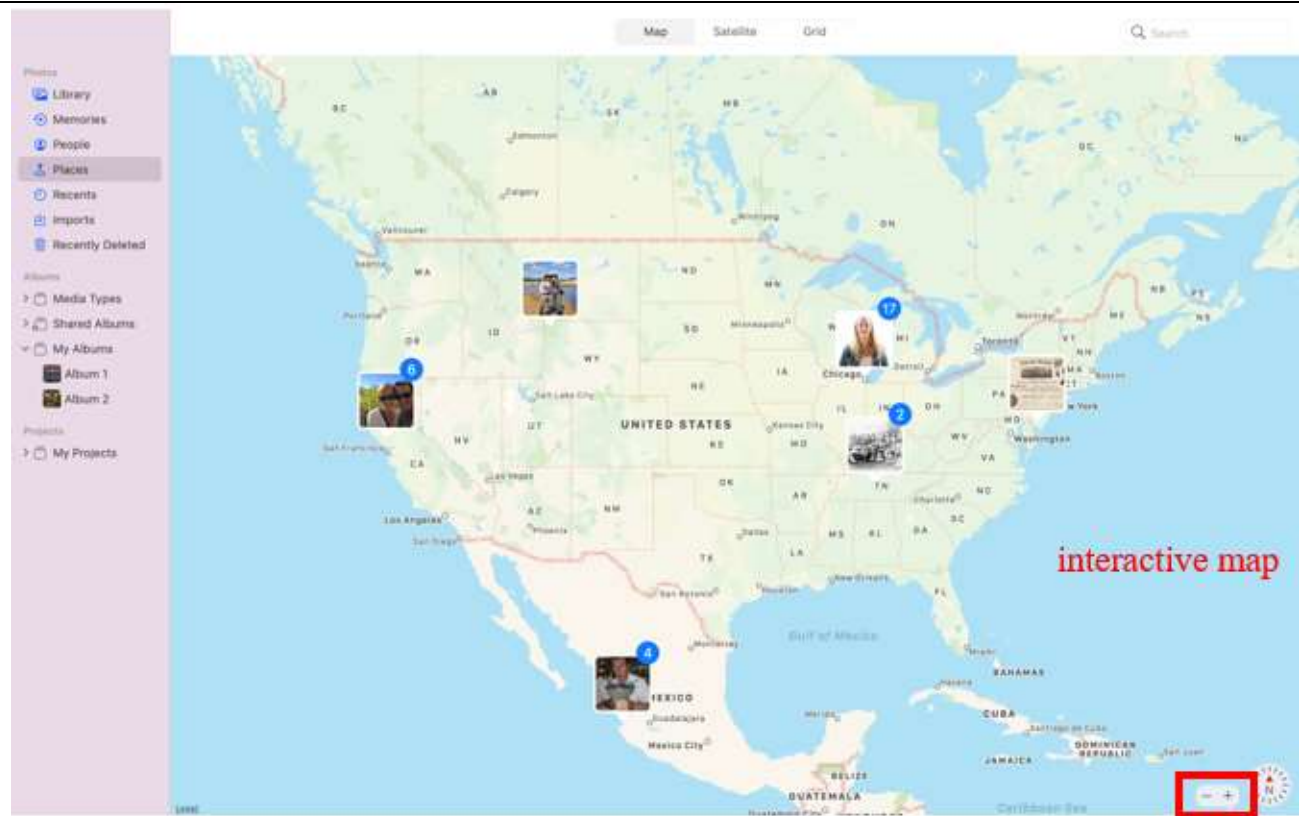


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS

	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places (highlighted with a red box), Recents, Imports, and Recently Deleted. Below these are sections for Albums (Media Types, Shared Albums, My Albums) and Projects (My Projects). The main area displays a map of the United States and Mexico. Several photo thumbnails are overlaid on the map, each with a blue circular badge containing a number (e.g., 6, 17, 2, 4). The map includes state and country labels, a search bar at the top right, and map controls like 'Map', 'Satellite', and 'Grid' at the top.</p>
<p><b>1[a][i]</b> (i) an interactive map;</p>	<p>The map view includes an interactive map. The map is interactive at least because macOS can zoom in and out.</p>

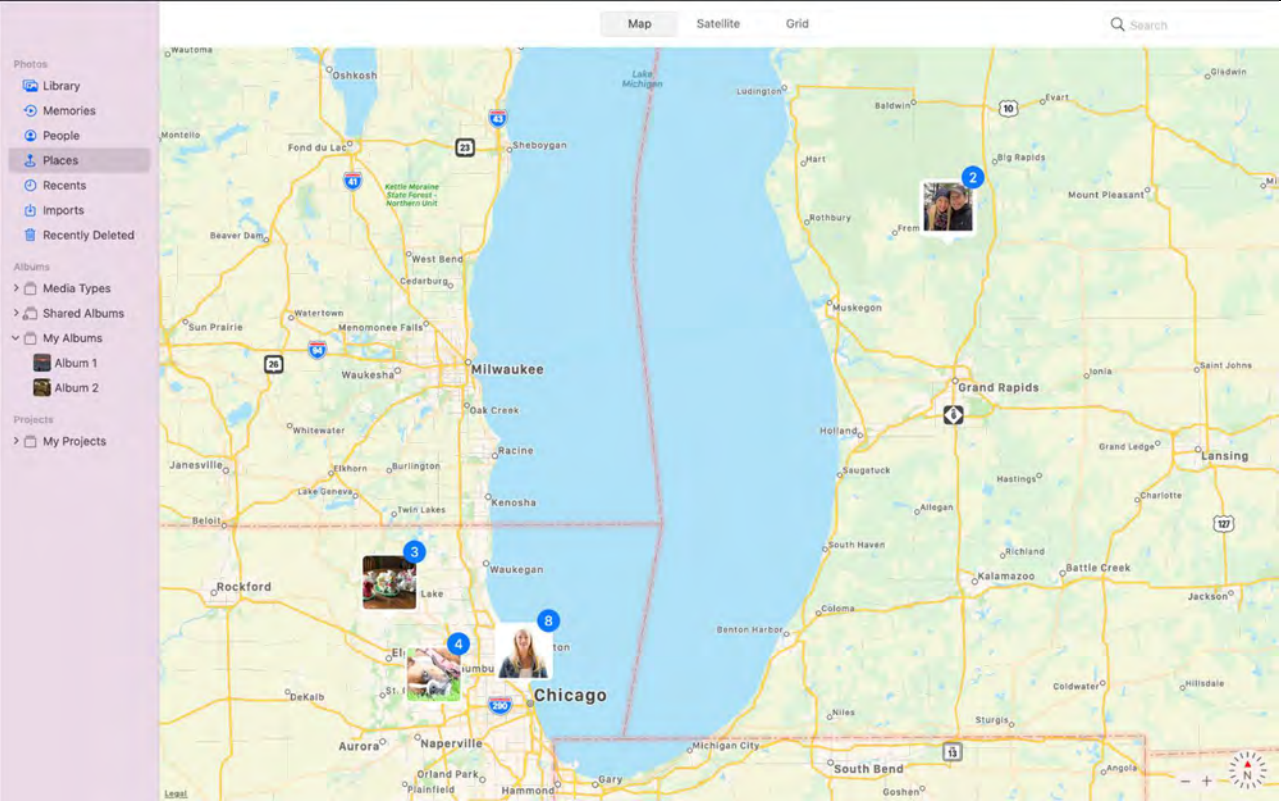


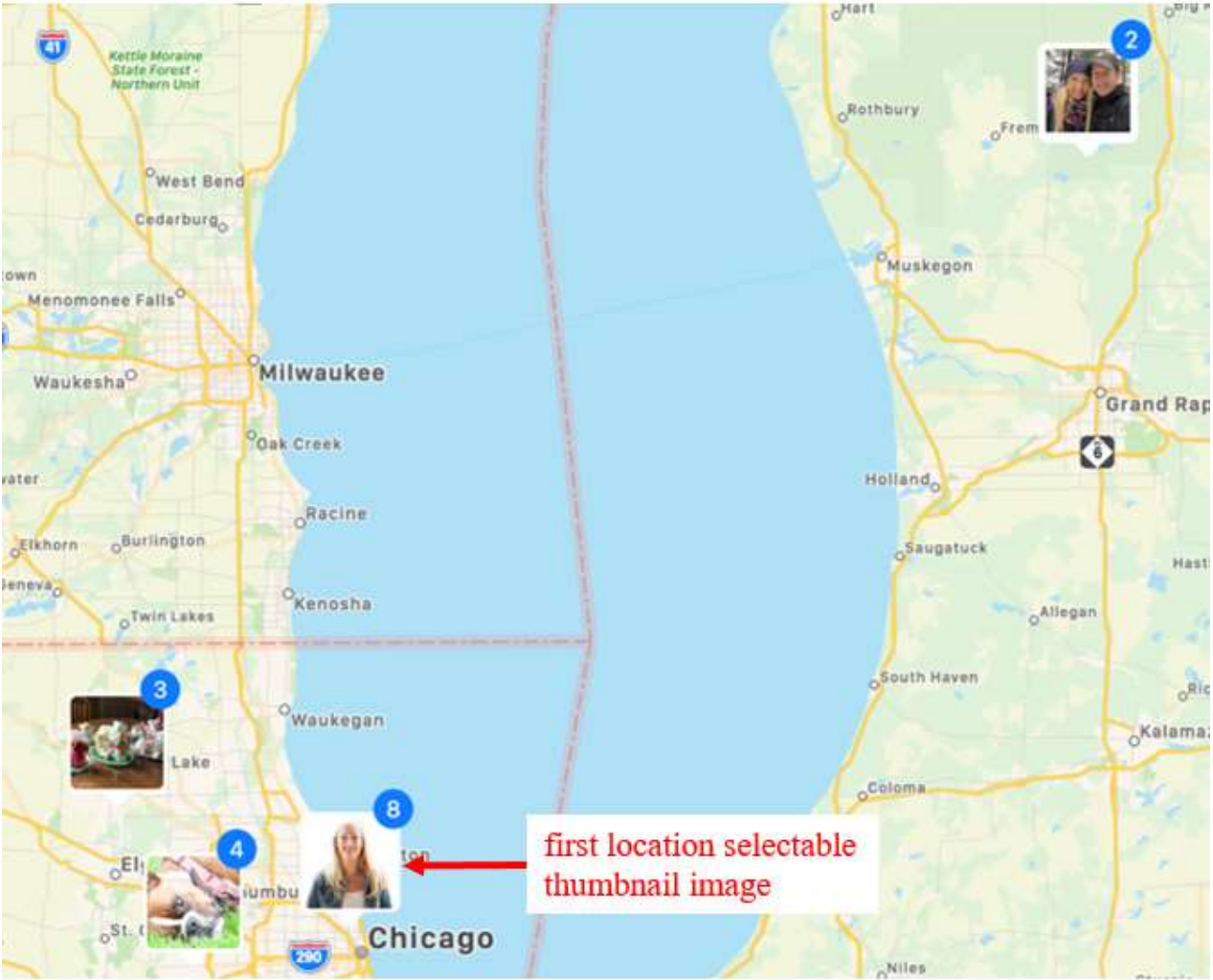
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS



A zoomed in view is shown below.

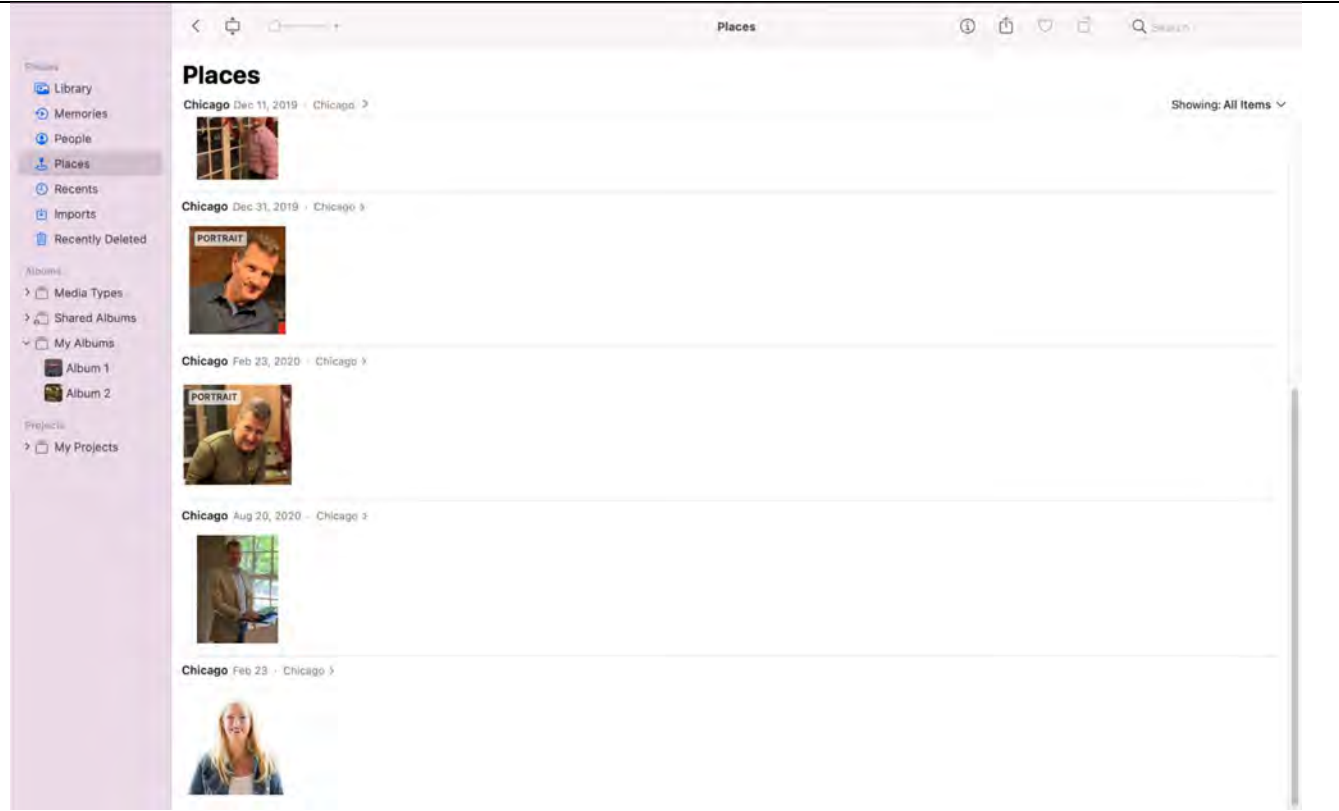
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS

	
<p><b>1[a][ii]</b> (ii) a first location selectable thumbnail image at a first location on the interactive map; and</p>	<p>The map view includes a first location selectable thumbnail image at a first location on the interactive map.</p>

	 <p>The map shows the western shore of Lake Michigan, including Milwaukee and Chicago. Several thumbnail images are overlaid on the map, each with a blue circular number: 2 (top right, photo of two people), 3 (middle left, photo of a plate of food), 4 (bottom left, photo of a dog), and 8 (bottom center, photo of a woman). A red arrow points from a white text box containing the text "first location selectable thumbnail image" to the thumbnail labeled 8.</p>
<p><b>1[a][iii]</b> (iii) a second location selectable thumbnail image at a second location on the interactive map;</p>	<p>The map view includes a second location selectable thumbnail image at a second location on the interactive map.</p>

	<p>The image shows a map of the Great Lakes region, including Milwaukee and Chicago. Several location-selectable thumbnail images are overlaid on the map, numbered 2, 3, 4, and 8. A red arrow points from a text box 'second location selectable thumbnail image' to thumbnail 2, which shows a couple's photo.</p>
<p><b>1[b]</b> responsive to an input that is indicative of a selection of the first location selectable thumbnail image,</p>	<p>Responsive to an input that is indicative of a selection of the first location selectable thumbnail image, macOS displays a first location view on the interface.</p>

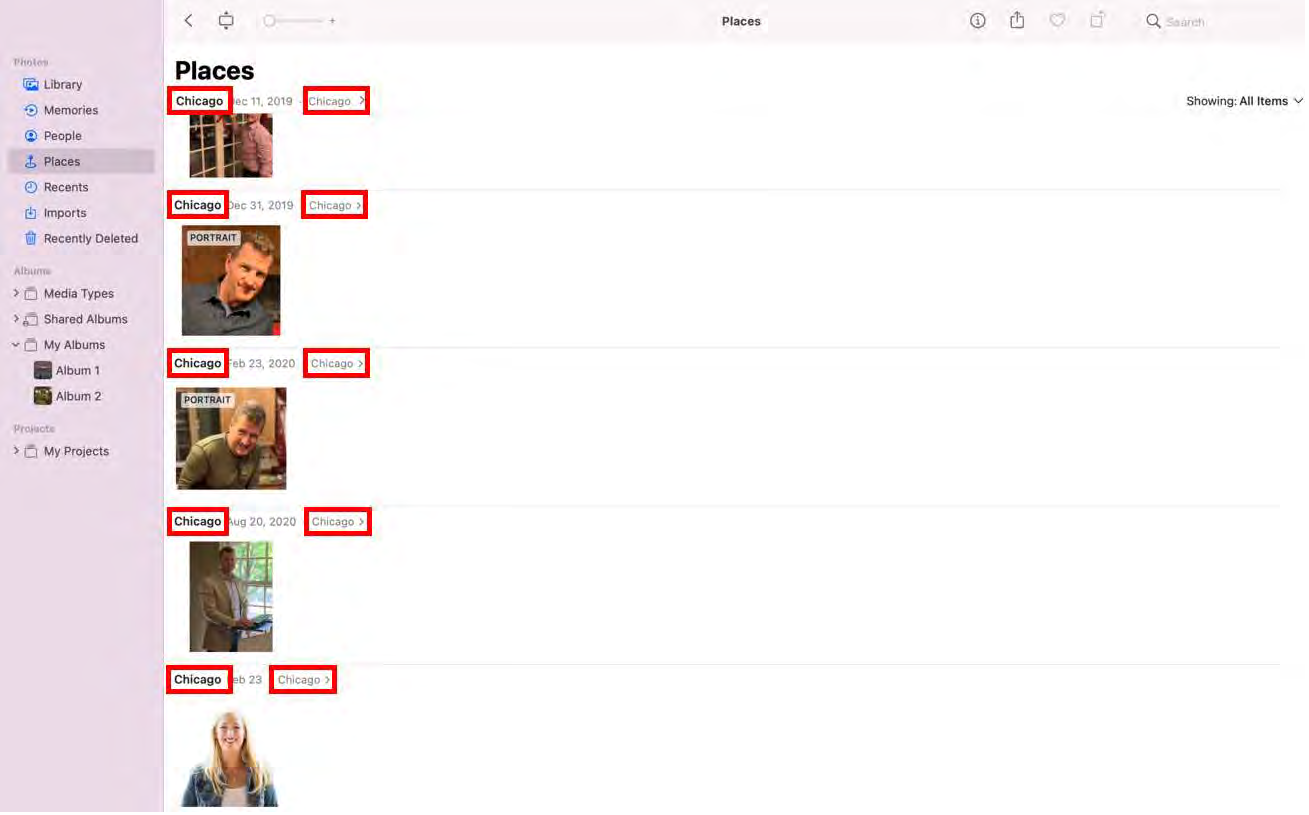
causing a first location view to be displayed on the interface, the first location view including



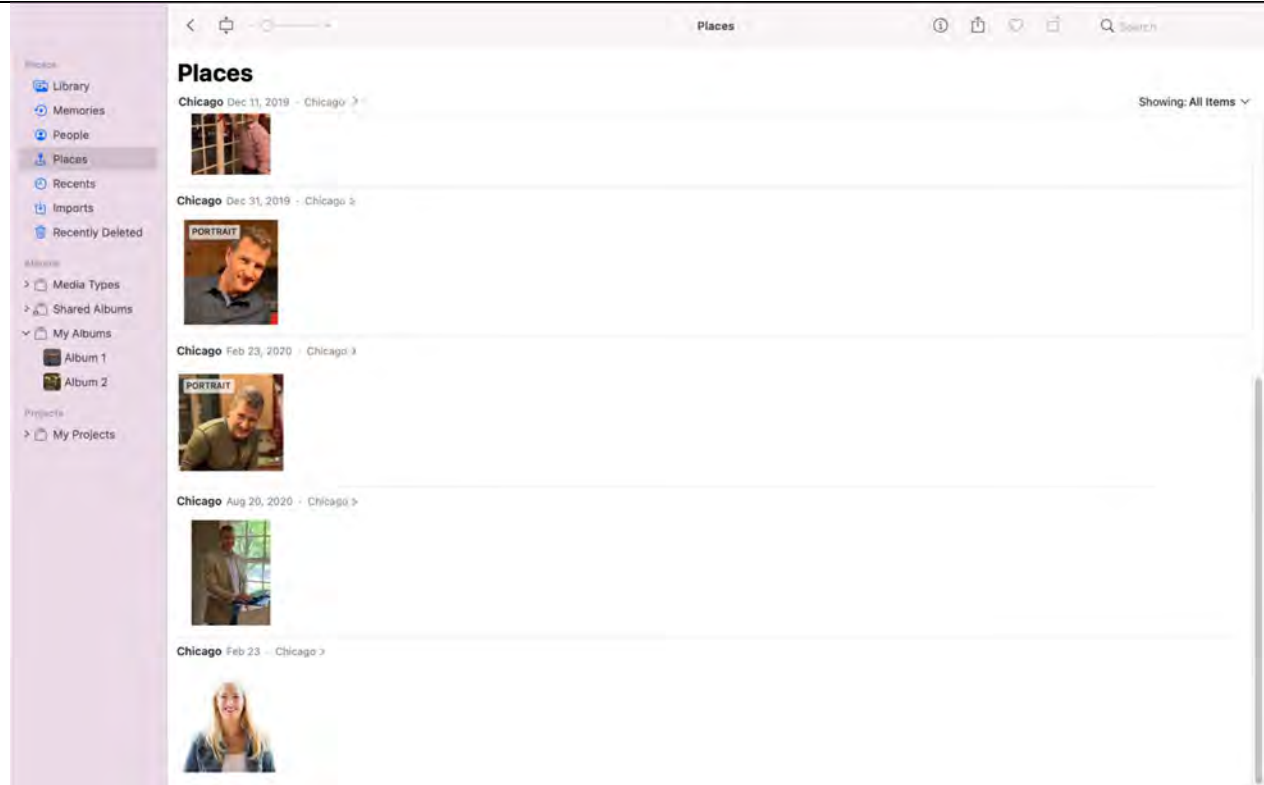
**1[b][i]** (i) a first location name associated with the first location and

The first location view includes a first location name associated with the first location (in this example, Chicago).



	
<p><b>1[b][ii]</b> (ii) a representation of at least a portion of one digital file in a first set of digital files, each of the digital files in the first set of digital files being produced from outputs of one or more digital imaging devices, the first set of digital files</p>	<p>The first location view includes a representation of at least a portion of one digital file in a first set of digital files.</p>

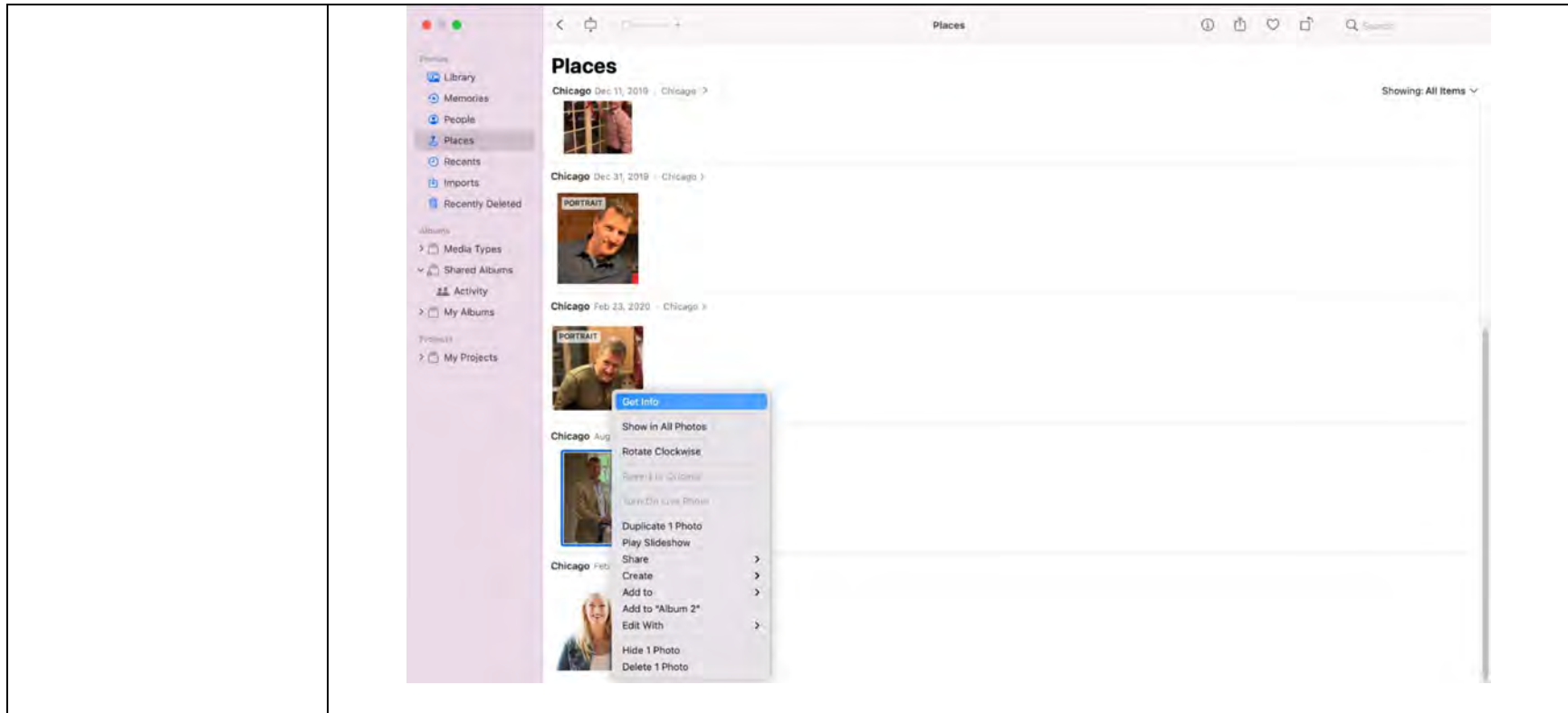
including digital files associated with the first location;

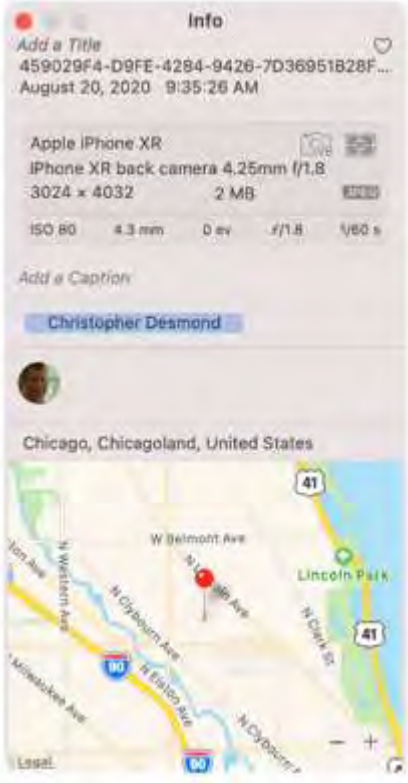


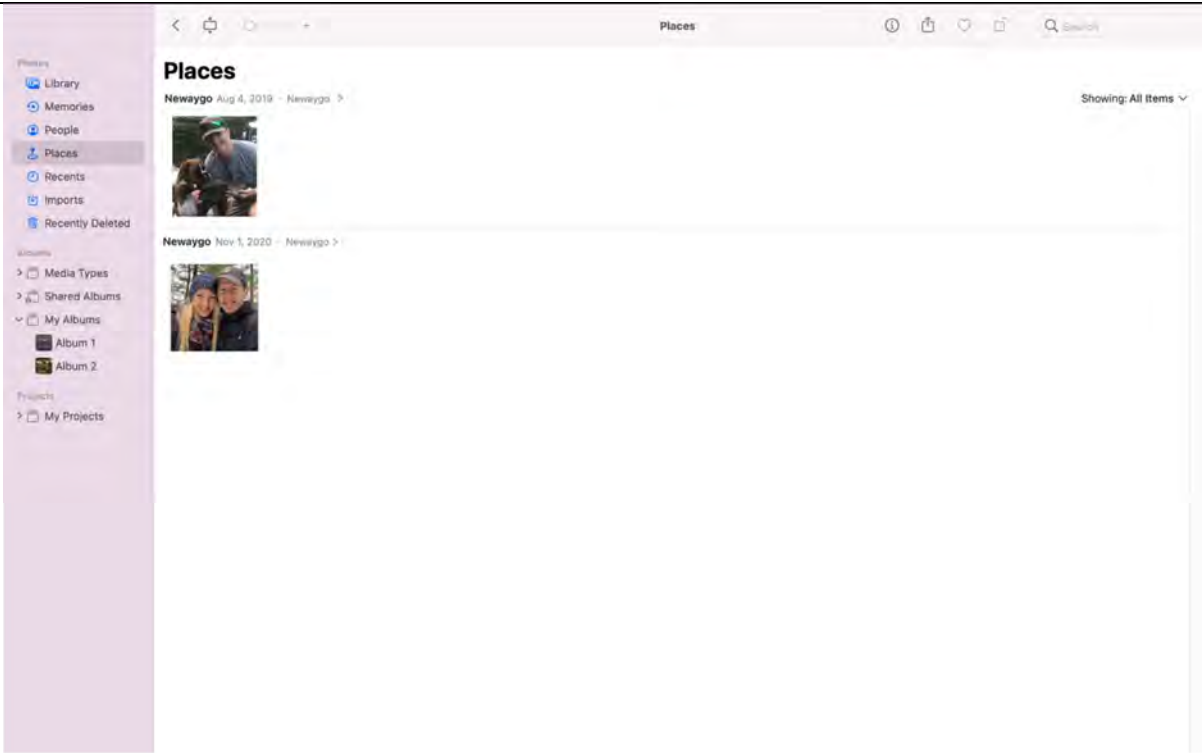
Each of the digital files in the first set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).

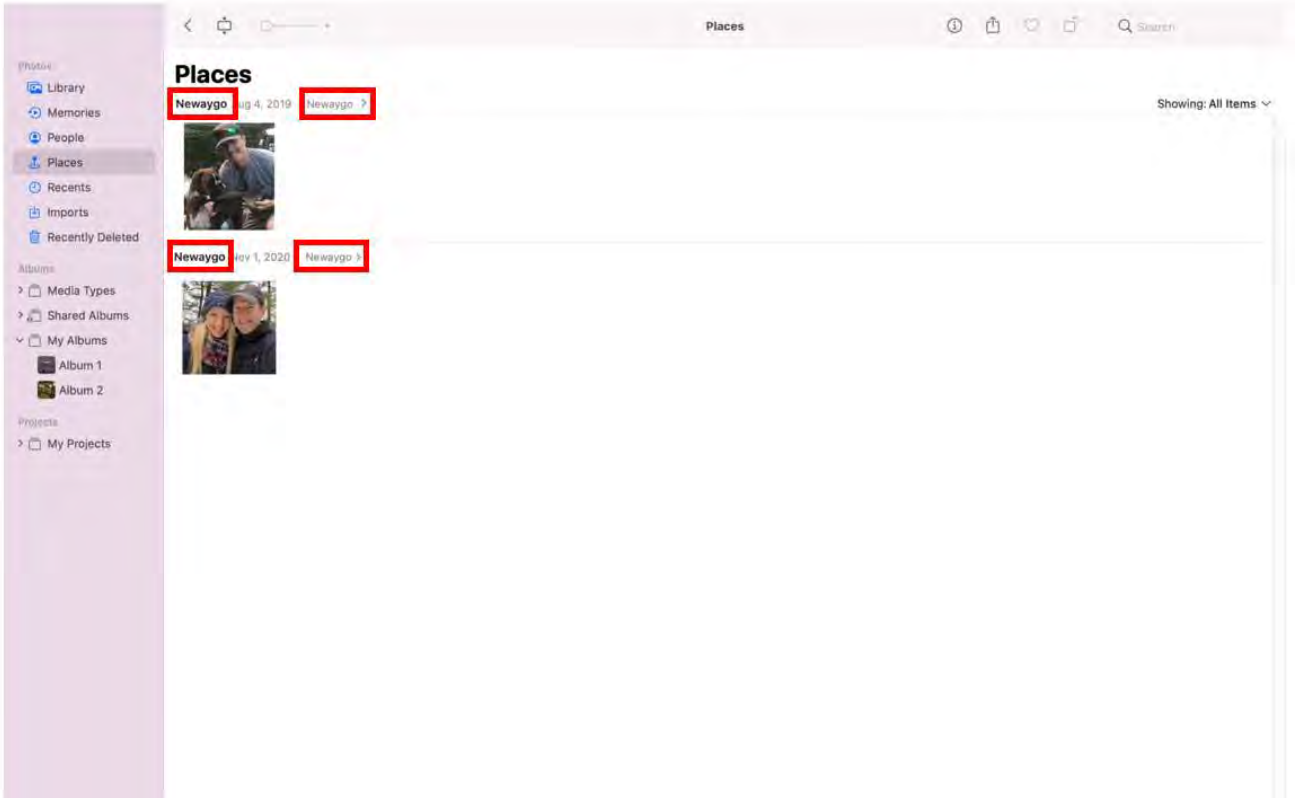


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS

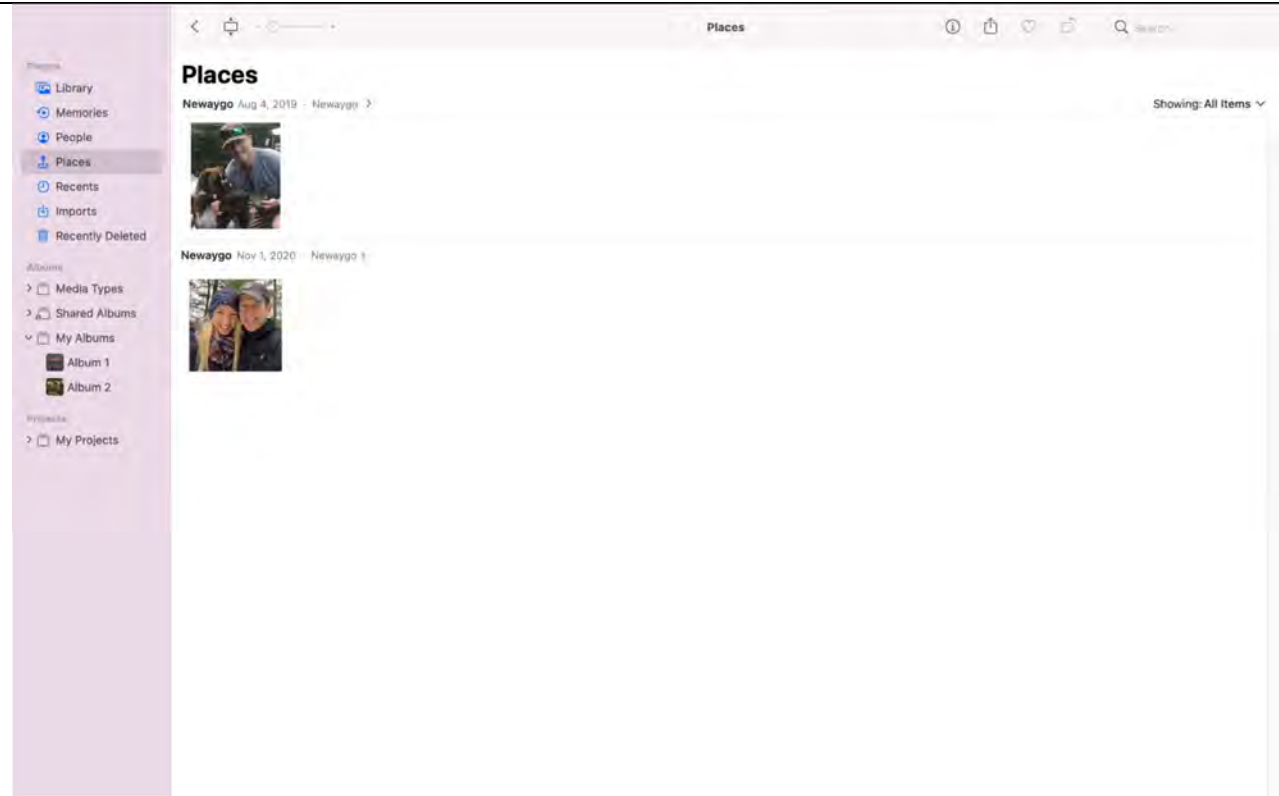


	 <p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone XR (a digital imaging device). The first set of digital files includes digital files associated with the first location (in this example, Chicago or Chicagoland).</p>
<p><b>1[c]</b> responsive to an input that is indicative of a selection of the second location selectable thumbnail image, causing a second location view to be displayed on the</p>	<p>Responsive to an input that is indicative of a selection of the second location selectable thumbnail image, macOS displays a second location view on the interface.</p>

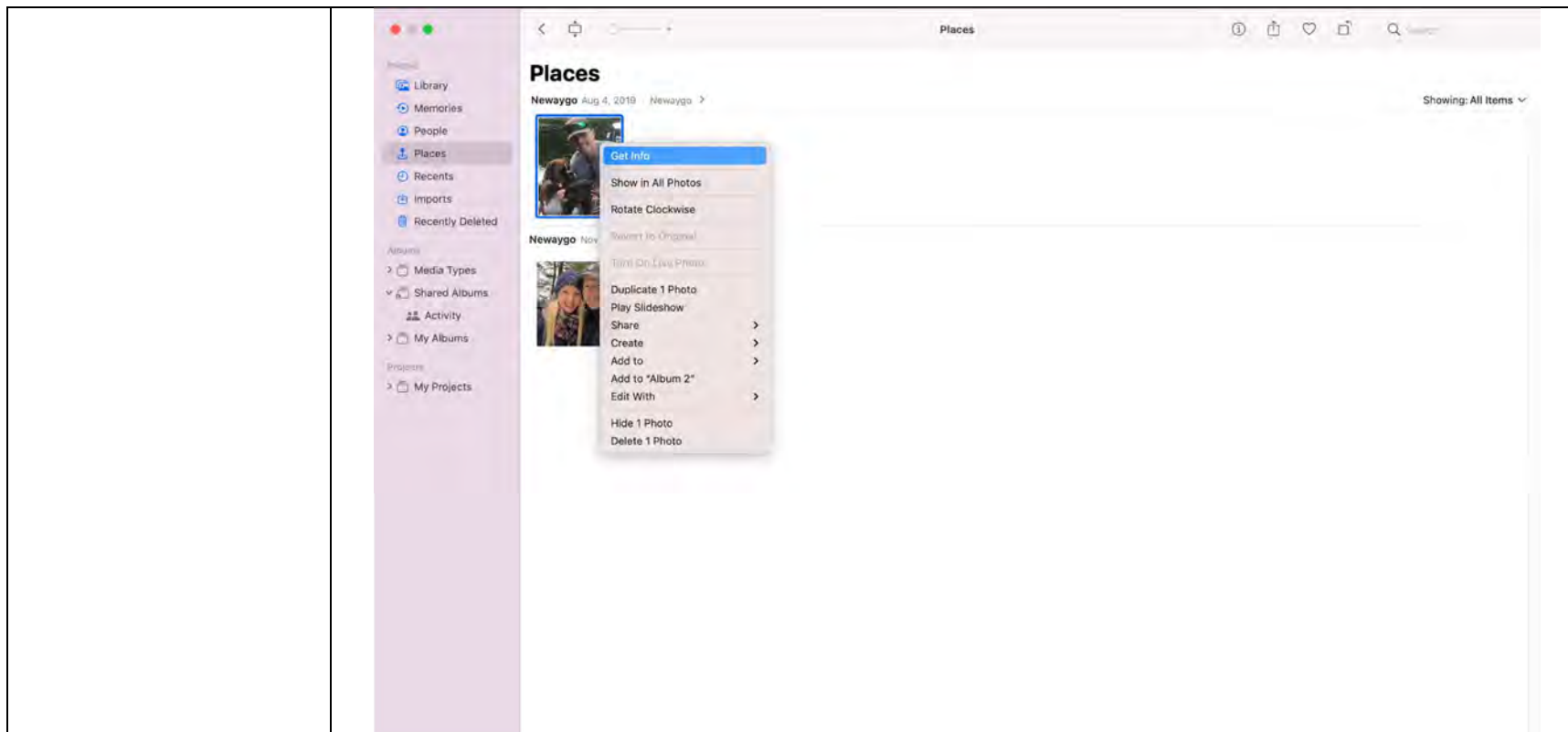
<p>interface, the second location view including</p>	
<p><b>1[c][i]</b> (i) a second location name associated with the second location and</p>	<p>The second location view includes a second location name associated with the second location.</p>

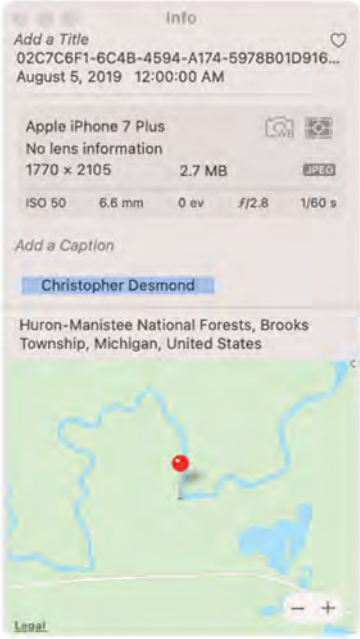
	
<p><b>1[c][ii]</b> (ii) a representation of at least a portion of one digital file in a second set of digital files, each of the digital files in the second set of digital files being produced from outputs of the one or more digital imaging devices, the second set of digital files including digital</p>	<p>The second location view includes a representation of at least a portion of one digital file in a second set of digital files.</p>

files associated with the second location; and

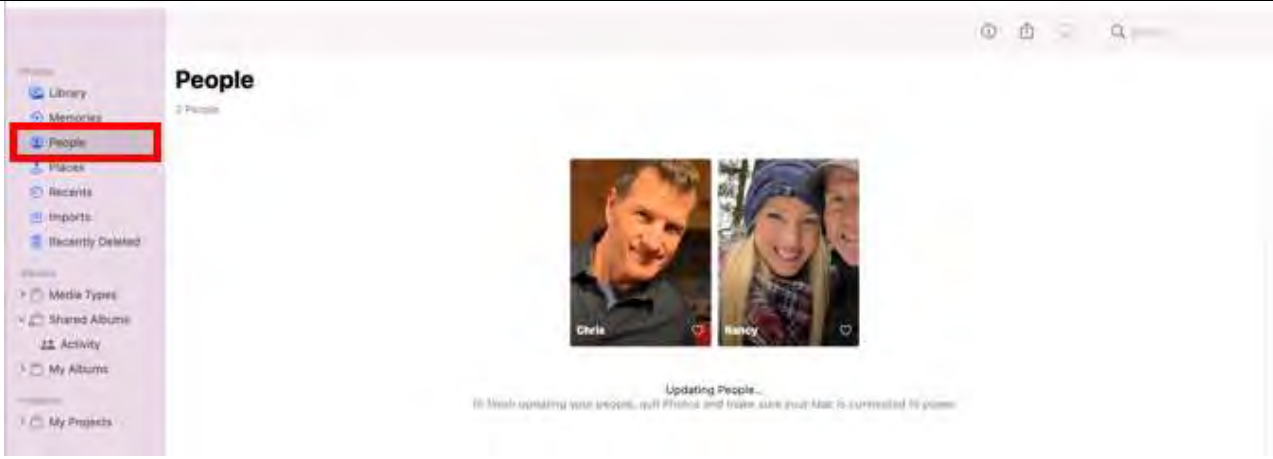
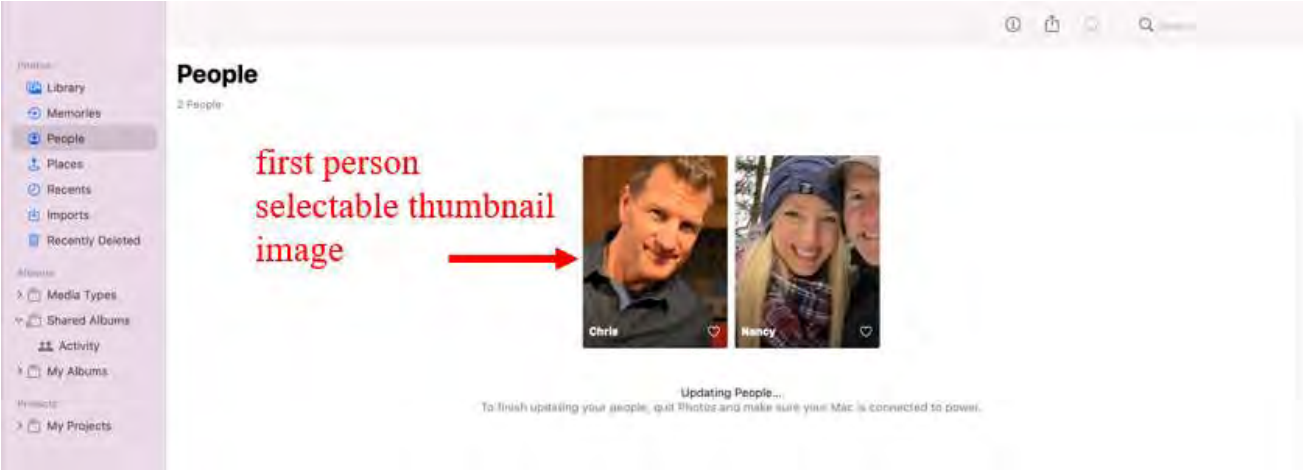


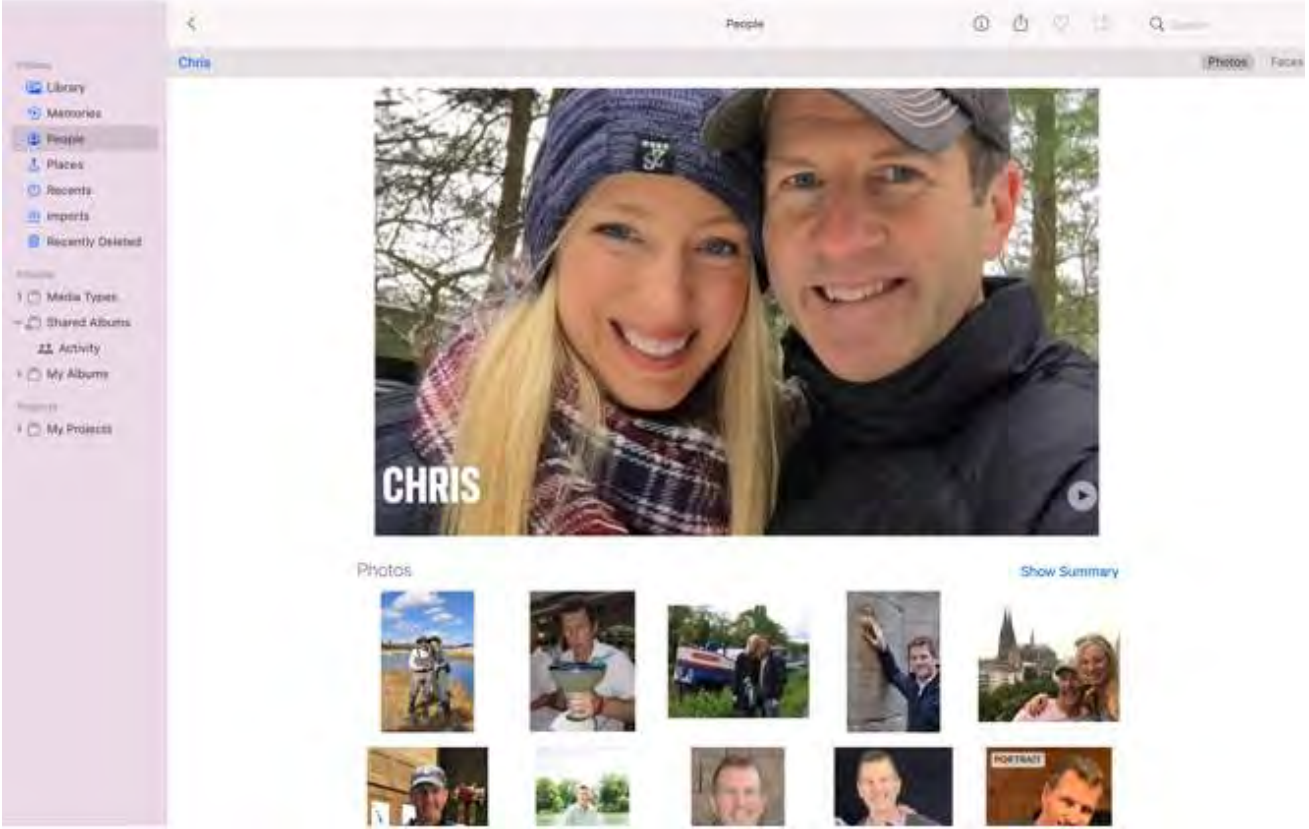
Each of the digital files in the second set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).

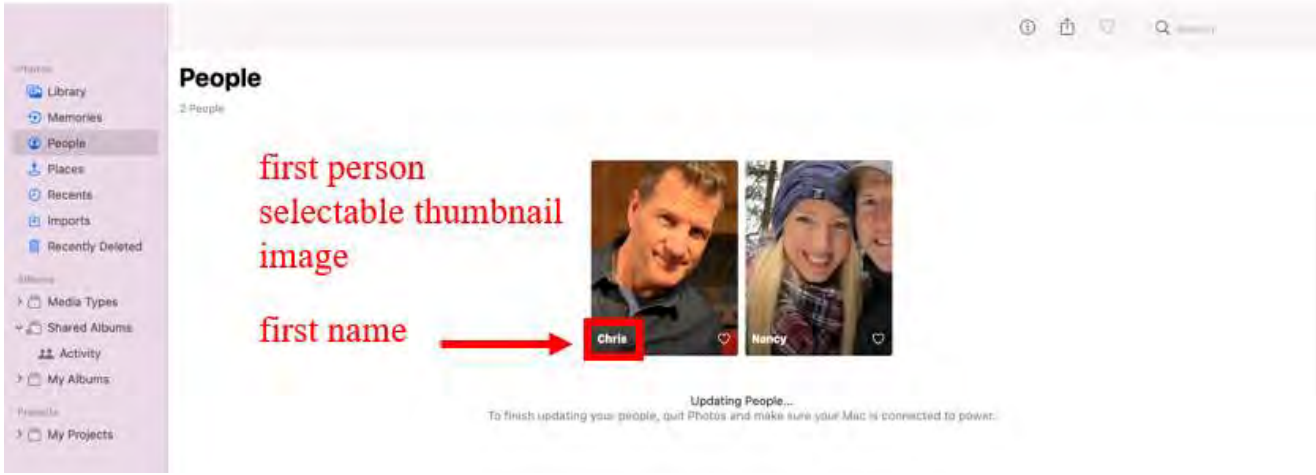


	 <p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone 7 Plus (a digital imaging device). The second set of digital files includes digital files associated with the second location.</p>
<p><b>1[d]</b> responsive to a second input that is subsequent to the first input, causing a people view to be displayed on the interface, the people view including:</p>	<p>Responsive to a second input that is subsequent to the first input (e.g., clicking the “Places” element), macOS displays a people view on the interface.</p>



	
<p><b>1[d][i]</b> (i) a first person selectable thumbnail image including a representation of a face of a first person, the first person being associated with a third set of digital files including digital photographs and videos;</p>	<p>The people view includes a first person selectable thumbnail image including a representation of a face of a first person.</p>  <p>The first person is associated with a third set of digital files including digital photographs and videos.</p>

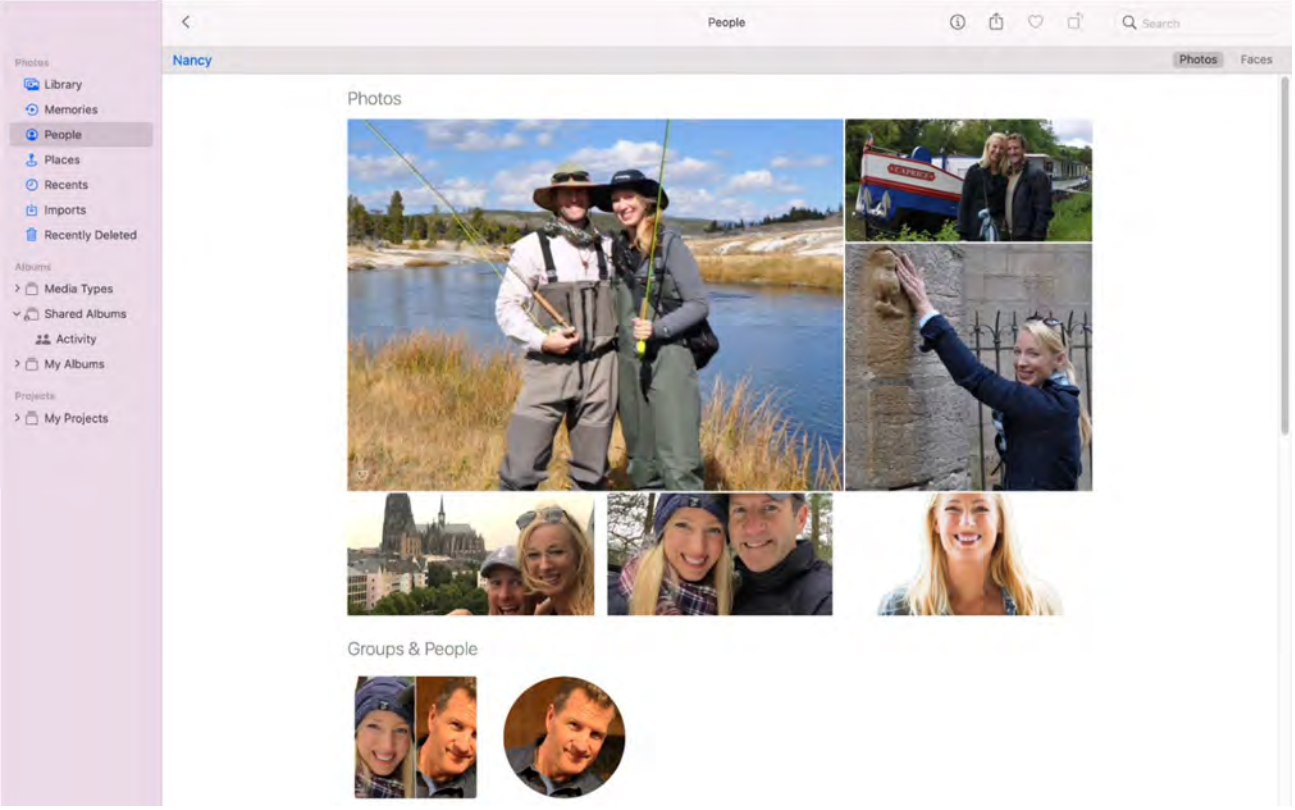
	
<p><b>1[d][ii]</b> (ii) a first name associated with the first person, the first name being displayed adjacent to the first person selectable thumbnail image;</p>	<p>The people view includes a first name associated with the first person displayed adjacent to the first person selectable thumbnail image.</p>

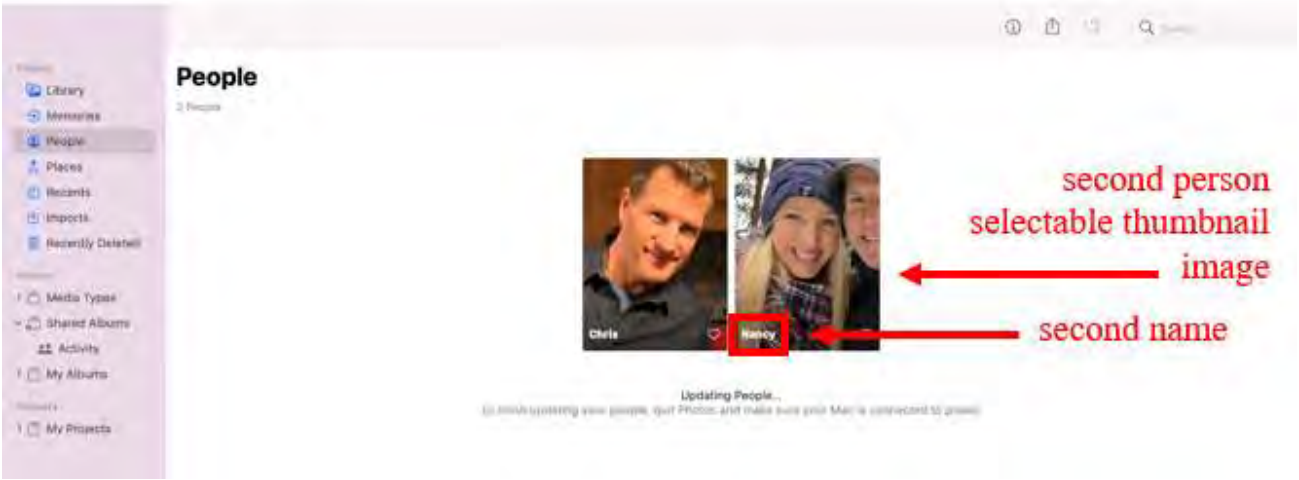
	 <p>To the extent it is found that the first name associated with the first person is not literally displayed adjacent to the first person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name associated with the first person is to communicate the name of the first person that is associated with the first person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the first name associated with the first person in sufficient proximity to the first person selectable thumbnail image such that a user will associate the first name associated with the first person with the first person selectable thumbnail image. The result of the claimed displaying is that the first name is associated with the first person selectable thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>1[d][iii]</b> (iii) a second person selectable thumbnail image including a representation of a face of a second person, the second person being associated with a fourth</p>	<p>The people view includes a second person selectable thumbnail image including a representation of a face of a second person.</p>

set of digital files including digital photographs and videos; and

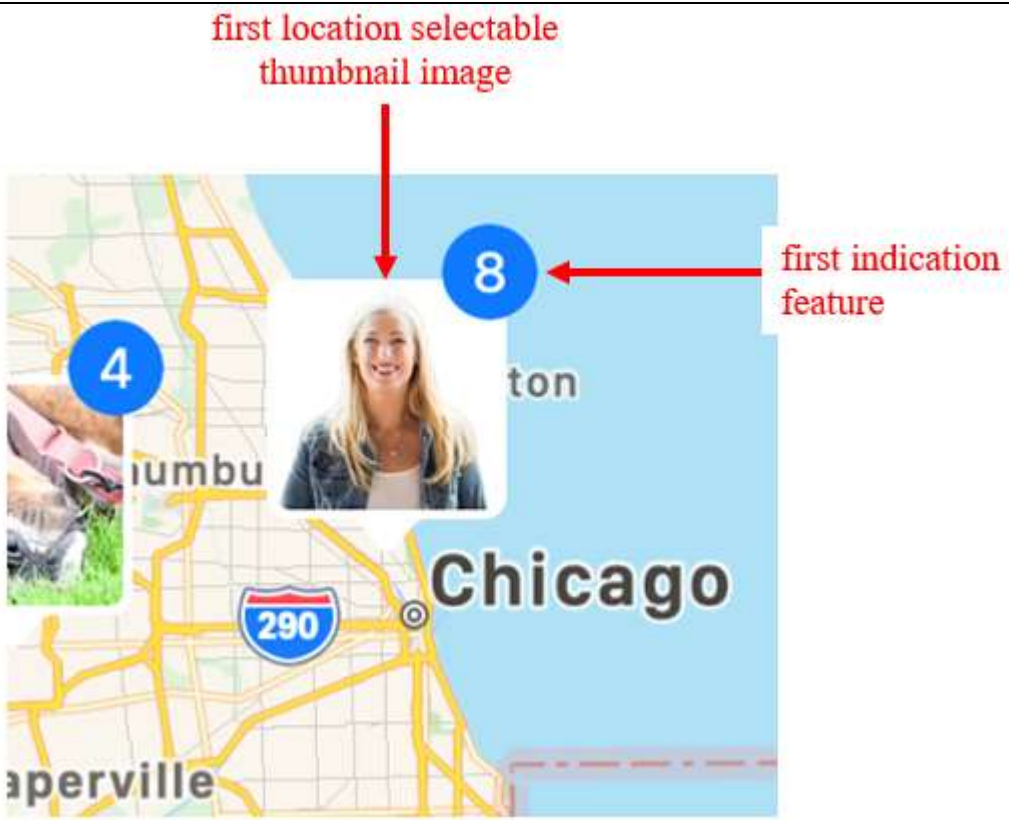


The second person is associated with a fourth set of digital files including digital photographs and videos.

	
<p><b>1[d][iv]</b> (iv) a second name associated with the second person, the second name being displayed adjacent to the second person selectable thumbnail image.</p>	<p>The people view also includes a second name associated with the second person. The second name being displayed adjacent to the second person selectable thumbnail image. <i>See</i> information for element 1[d][ii].</p>

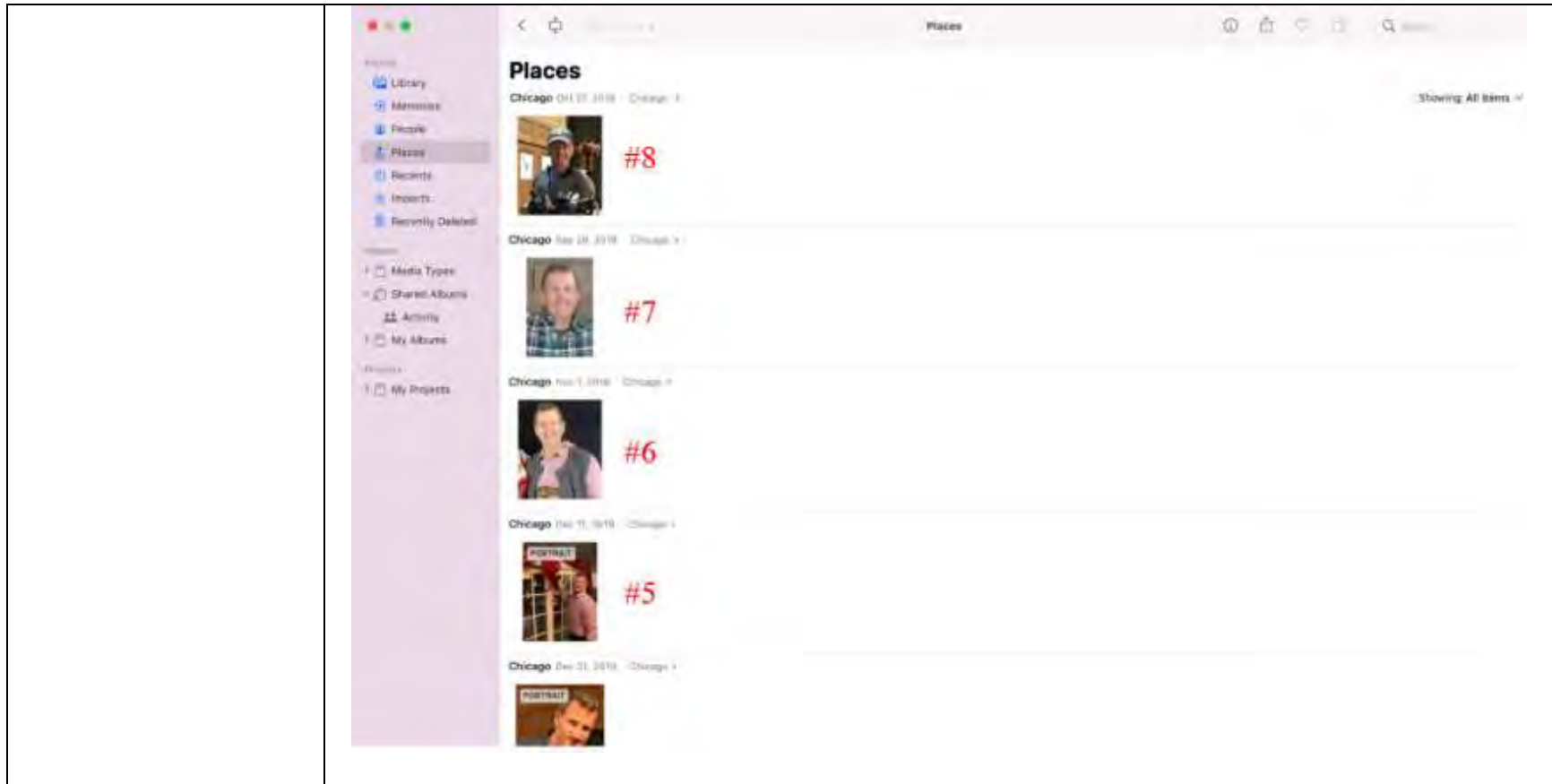
	 <p>The screenshot shows the 'People' section of the macOS Photos app. On the left is a sidebar with navigation options like Library, Memories, People, Places, Recents, Imports, Recently Deleted, Media Types, Shared Albums, Activity, and My Albums. The main area displays two person thumbnails. The first thumbnail is labeled 'Chris'. The second thumbnail is labeled 'Nancy'. A red box highlights the name 'Nancy' under the second thumbnail. Two red arrows point from text labels to the second thumbnail and its name: 'second person selectable thumbnail image' points to the thumbnail, and 'second name' points to the name 'Nancy'.</p> <p>To the extent it is found that the second name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name associated with the second person is to communicate the name of the second person that is associated with the second person selectable thumbnail image. The way the claimed displaying performs this function is by displaying the second name associated with the second person in sufficient proximity to the second person selectable thumbnail image such that a user will associate the second name associated with the second person with the second person selectable thumbnail image. The result of the claimed displaying is that the second name is associated with the second person selectable thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p>
<p><b>2[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>2[a]</b> the map view further includes a first indication feature associated with the first</p>	<p>The map view includes a first indication feature associated with the first location selectable thumbnail image.</p>



<p>location selectable thumbnail image</p>	
<p><b>2[b]</b> the first indication feature being based on a number of digital files in the first set of digital files in the first set of digital files.</p>	<p>The first indication feature is based on a number of digital files in the first set of digital files. In the example below, the first indication feature includes the number 8 and the first set of digital files includes 8 digital files.</p>

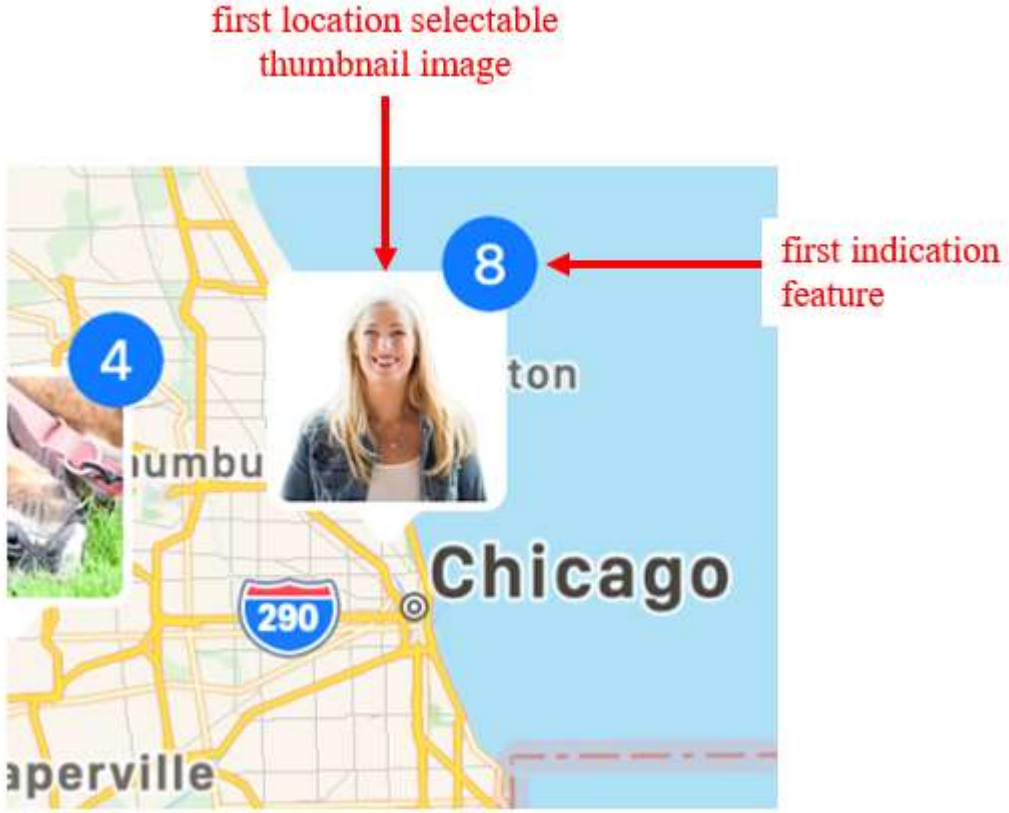


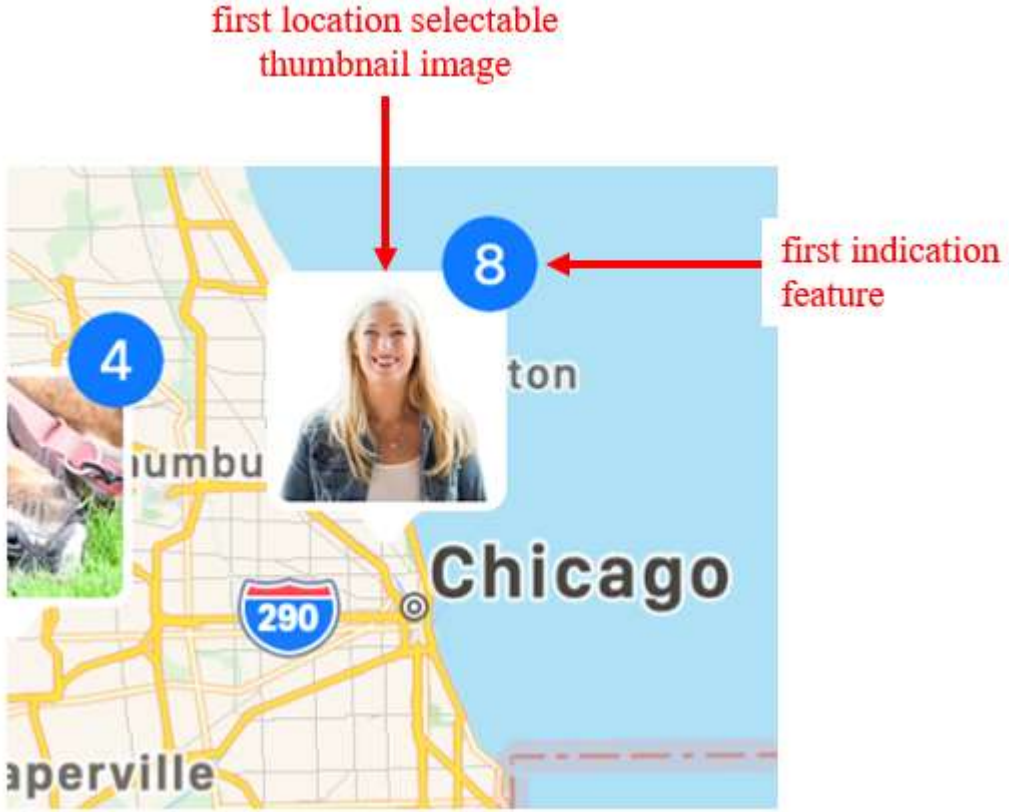
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS




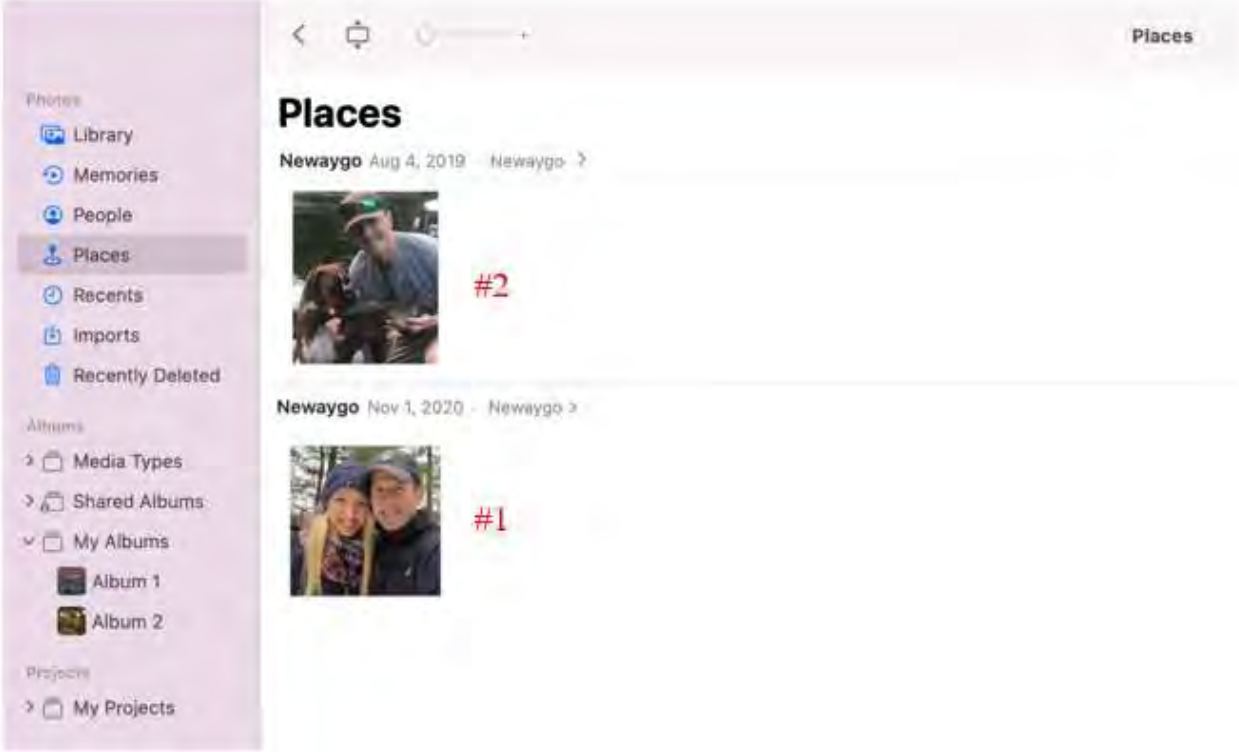
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS


<p><b>3.</b> The method of claim 2, wherein the first indication feature is connected to the first location selectable thumbnail image.</p>	<p>As shown below, the first indication feature is connected to the first location selectable thumbnail image.</p>

	 <p>first location selectable thumbnail image</p> <p>first indication feature</p> <p>4</p> <p>8</p> <p>ton</p> <p>Chicago</p> <p>290</p> <p>Naperville</p> <p>Jumbou</p>
<p>4. The method of claim 2, wherein the first indication feature includes a first number indicative of the number of digital files in the first set of digital files.</p>	<p>The first indication feature includes a first number indicative of the number of digital files in the first set of digital files. As discussed above for limitation 2[b], in the illustrated example, the first indication feature includes the number 8 and the first set of digital files includes 8 digital files.</p>


	 <p>The diagram shows a map view of a city area, including labels for 'Chicago', '290', 'perville', and 'ton'. A thumbnail image of a woman is overlaid on the map. A red arrow points to the thumbnail with the label 'first location selectable thumbnail image'. Another red arrow points to a blue circle with the number '8' with the label 'first indication feature'. A third blue circle with the number '4' is also visible on the map.</p>
<p><b>5[a]</b> The method of claim 2, wherein the map view further includes a second indication feature associated with the second location selectable thumbnail image,</p>	<p>The map view also includes a second indication feature associated with the second location selectable thumbnail image.</p>

	 <p>The image shows a map with a location marked by a blue circle containing the number '2'. A red arrow points from the text 'second location selectable thumbnail image' to a white-bordered thumbnail image of two people. Another red arrow points from the text 'second indication feature' to the blue circle with the number '2'. The map shows locations like 'Frem' and 'Big Rapid'.</p>
<p><b>5[b]</b> the second indication feature being based on a number of digital files in the second set of digital files.</p>	<p>The second indication feature is based on a number of digital files in the second set of digital files. In the example below, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p>

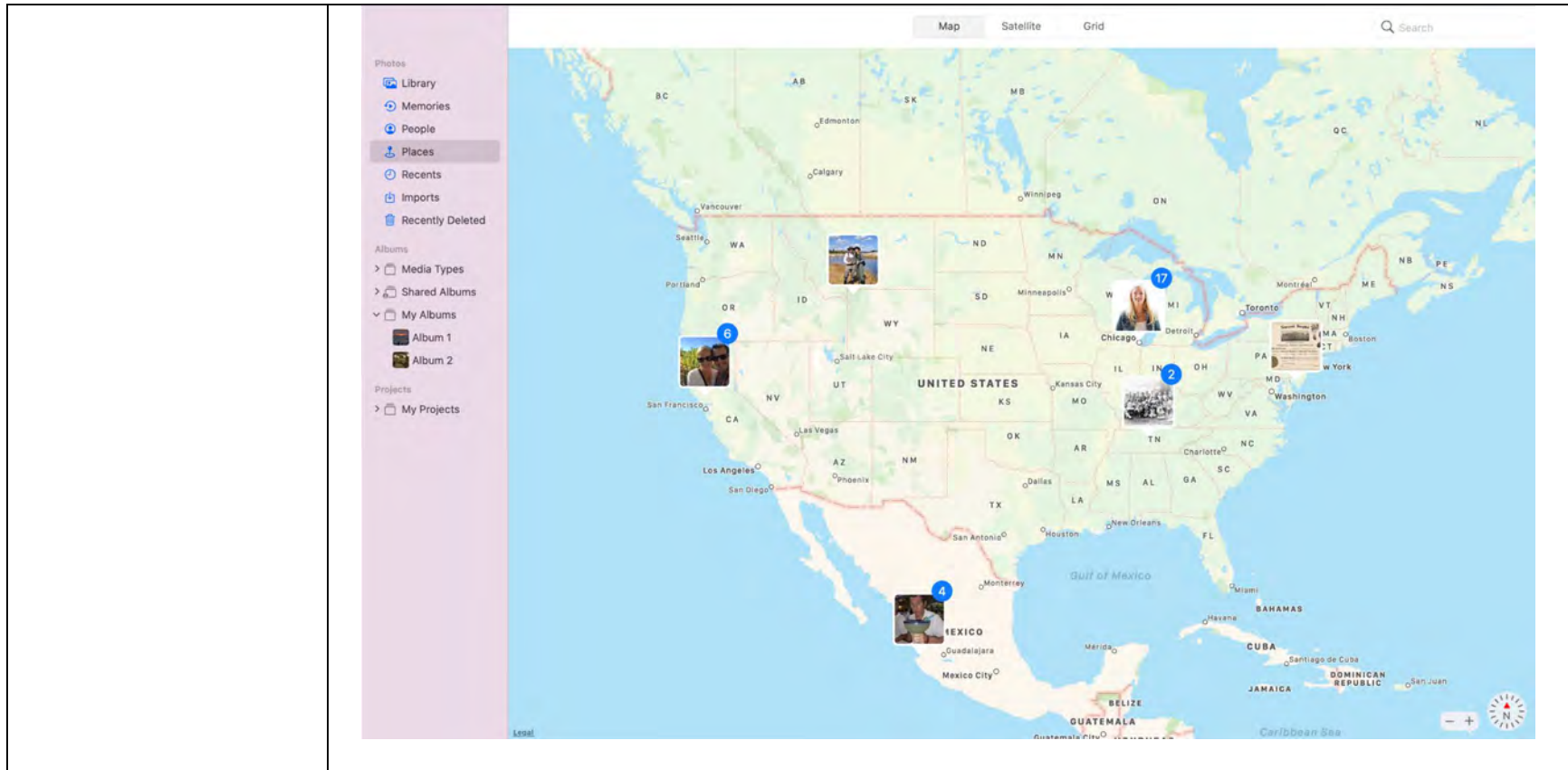
	
<p><b>6.</b> The method of claim 5, wherein the second indication feature is connected to the second location selectable thumbnail image.</p>	<p>As shown below, the second indication feature is connected to the second location selectable thumbnail image.</p>

	 <p>The image shows a map with two locations marked: 'Frem' and 'Big Rapid'. A red arrow points from the text 'second location selectable thumbnail image' to a small photo of a man and a woman. A blue circle containing the number '2' is positioned near the photo, with a red arrow pointing to it from the text 'second indication feature'.</p>
<p><b>7.</b> The method of claim 5, wherein the second indication feature includes a second number indicative of the number of digital files in the second set of digital files.</p>	<p>The second indication feature includes a second number indicative of the number of digital files in the second set of digital files. As discussed above for limitation 5[b], in the illustrated example, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p>

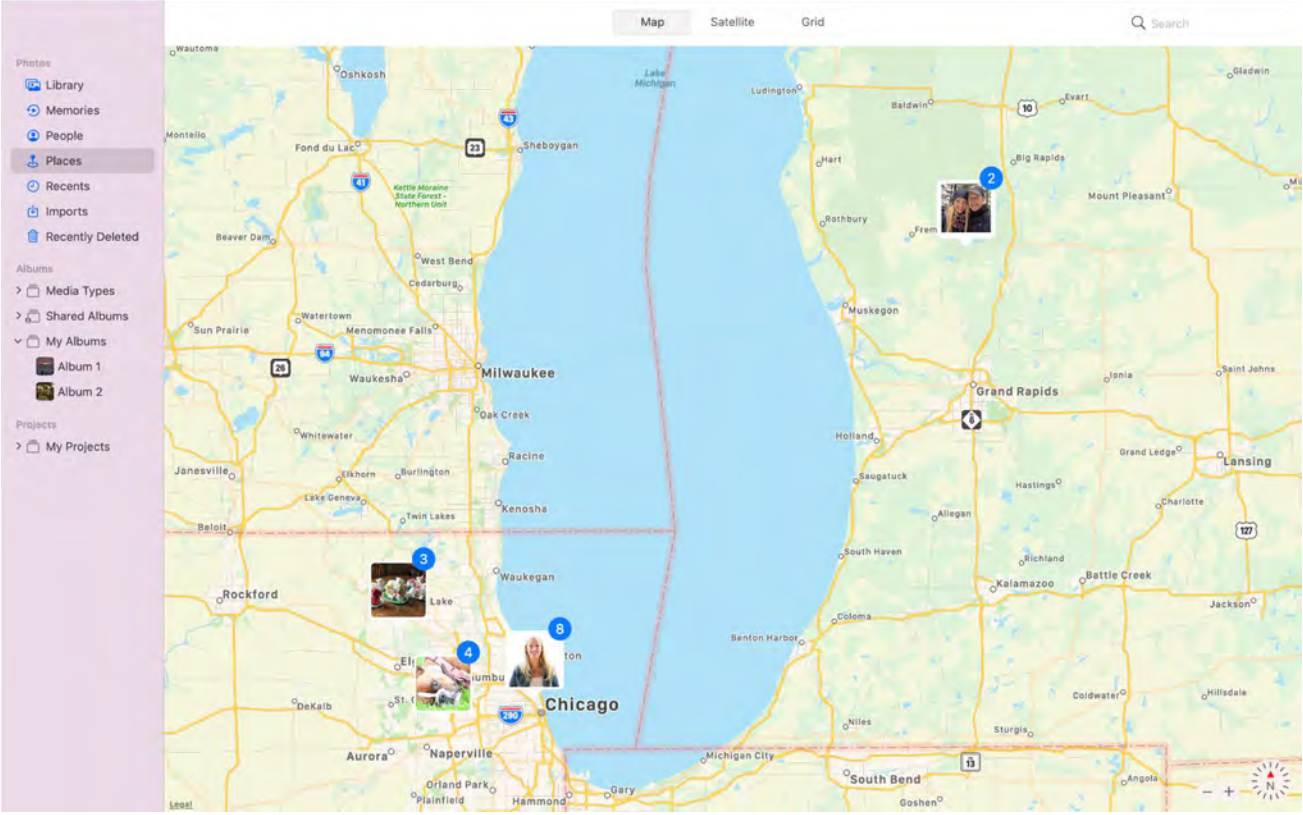


	 <p>The image shows a map with a yellow road. A white speech bubble contains a thumbnail photo of two people. A blue circle with the number '2' is positioned near the road. Red arrows point from text labels to the thumbnail and the number '2'.</p>
<p><b>8.</b> The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming in on the interactive map, modifying the first indication feature.</p>	<p>Subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming in on the interactive map, macOS modifies the first indication feature. In the example below, the first indication feature initially includes the number 17 when the map view is displayed, which is then modified responsive to zooming in.</p>

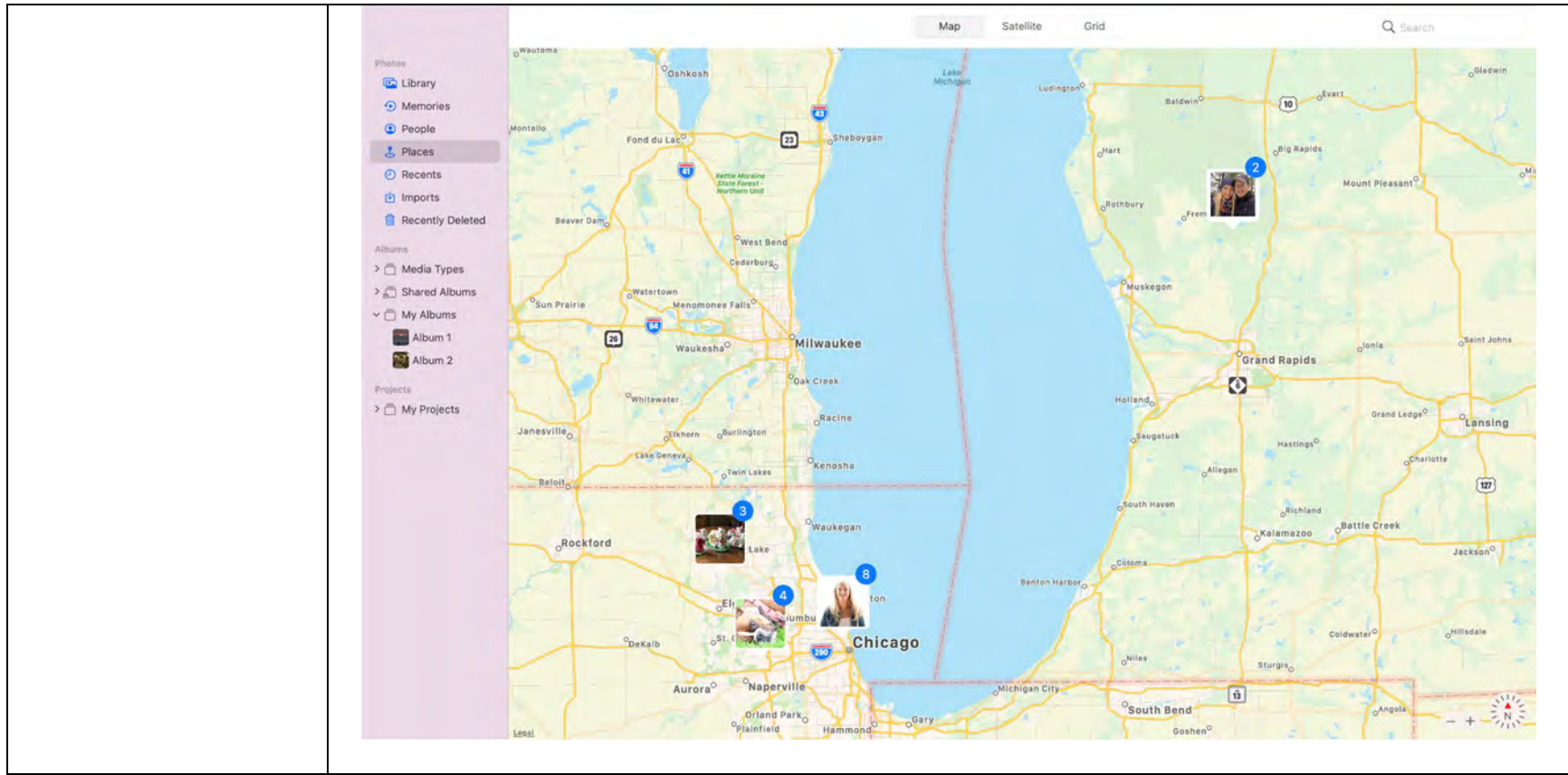
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS



Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS

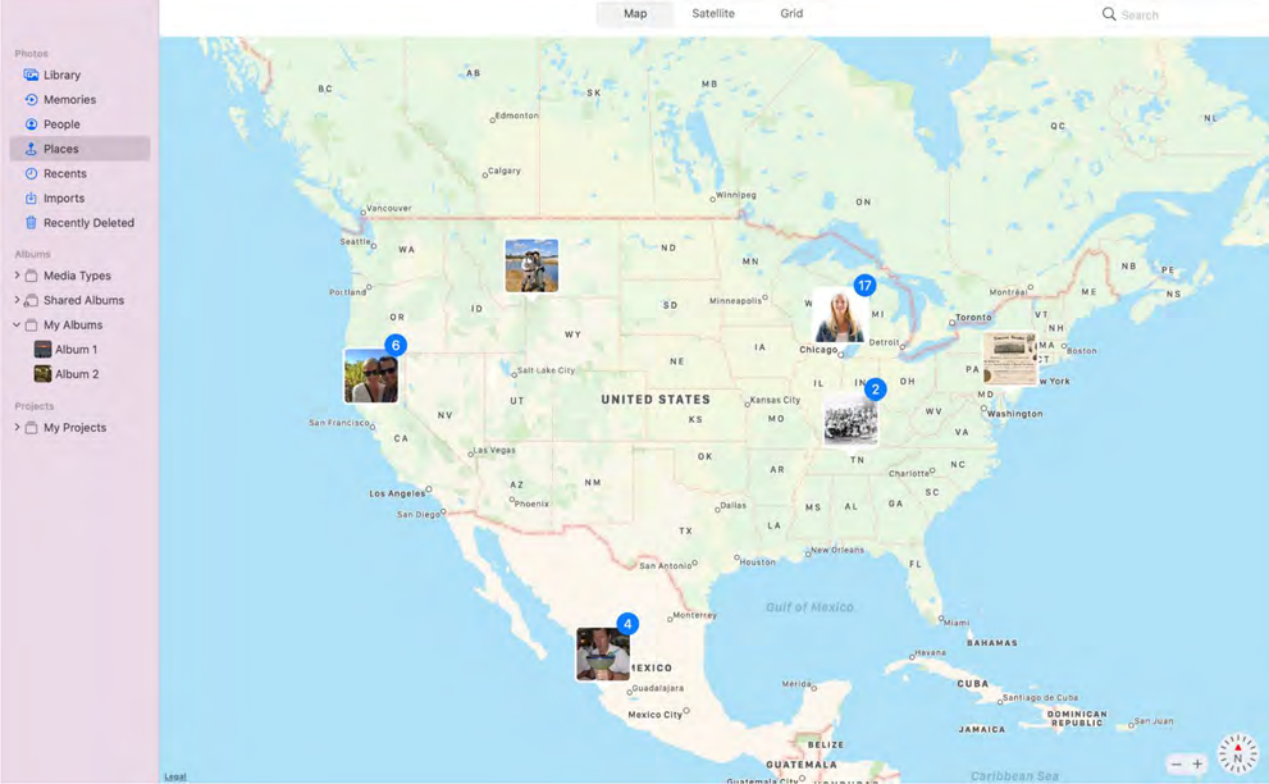
	
<p>9. The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming out on the interactive map, modifying the first indication feature.</p>	<p>Subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming out on the interactive map, macOS modifies the first indication feature. In the example below, the second indication feature is used as an illustrative example where the indication changes from 8 to 17 responsive to zooming out on the interactive map.</p>

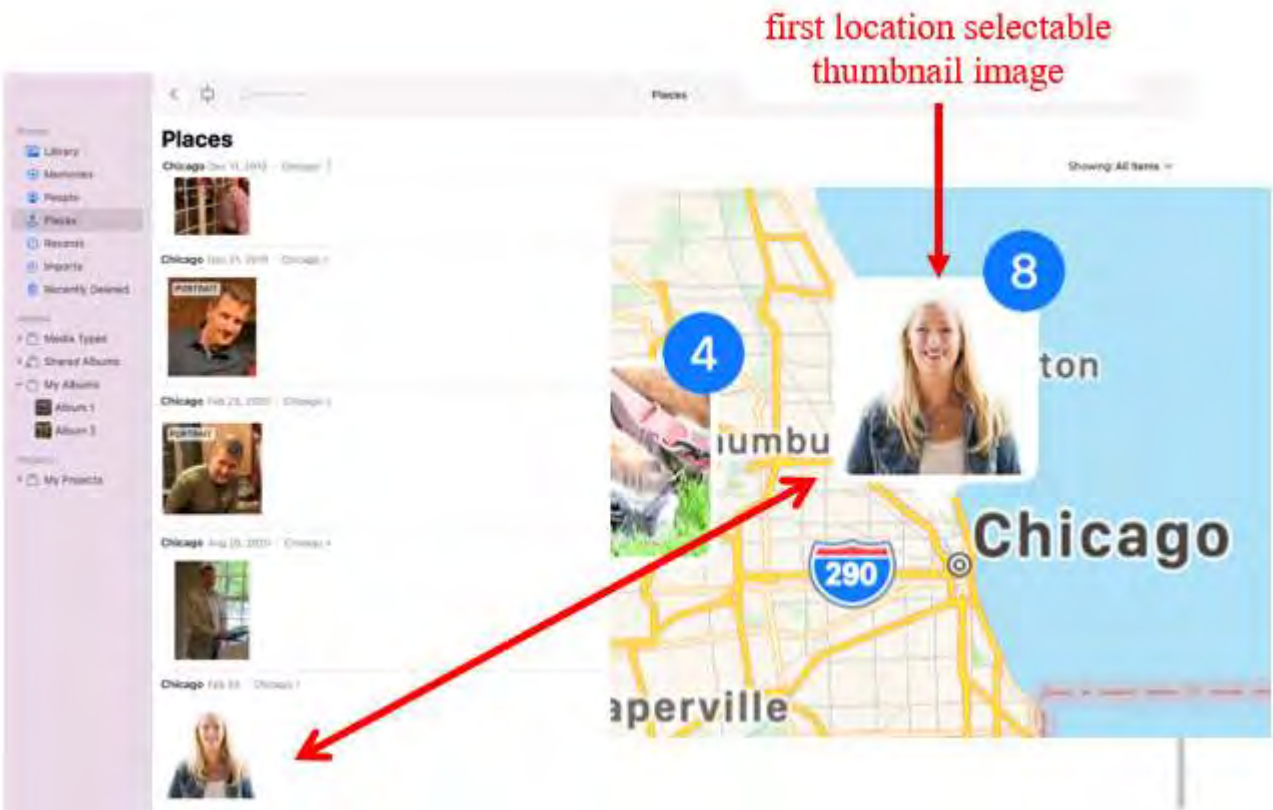
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS





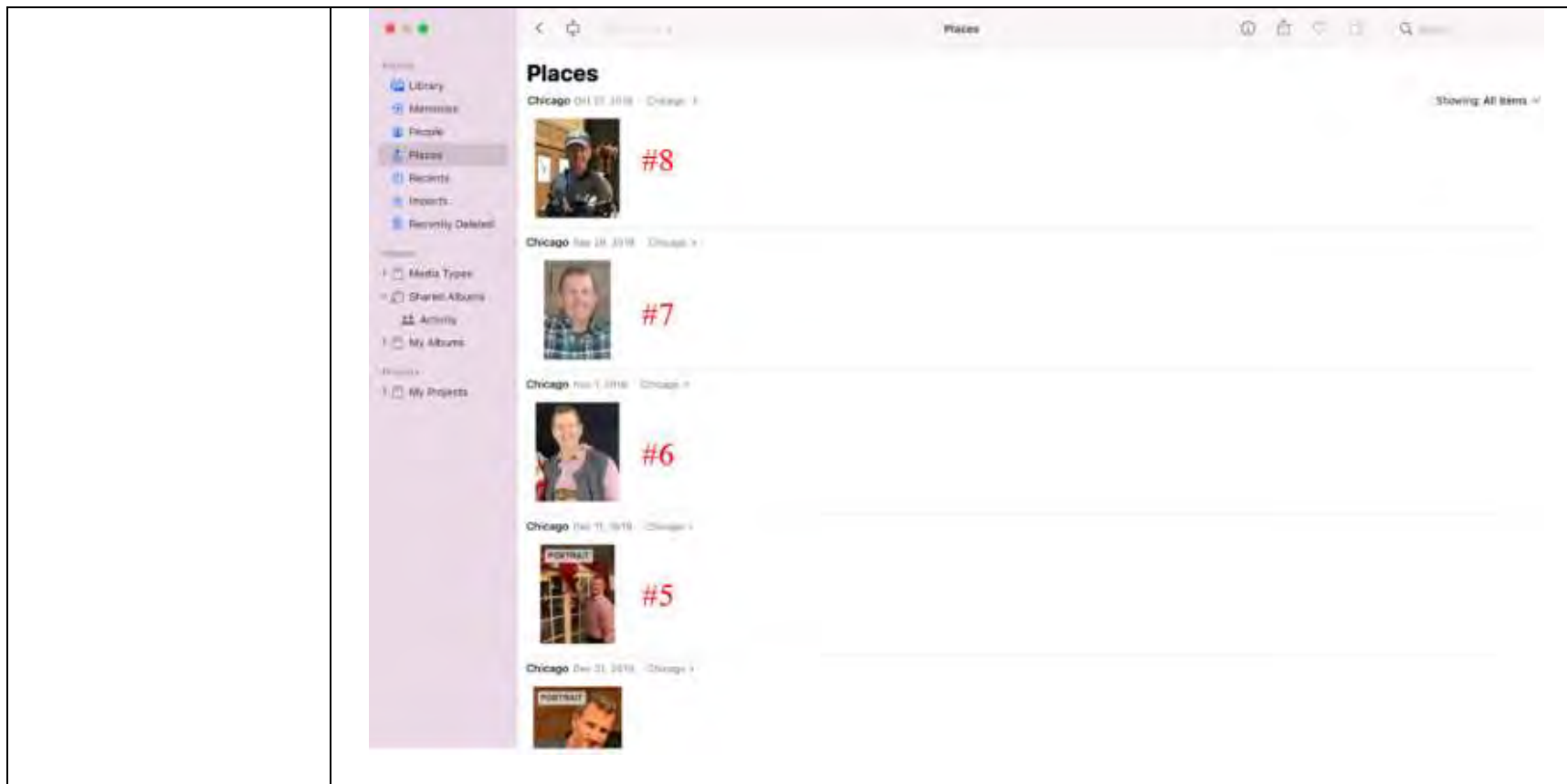
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS

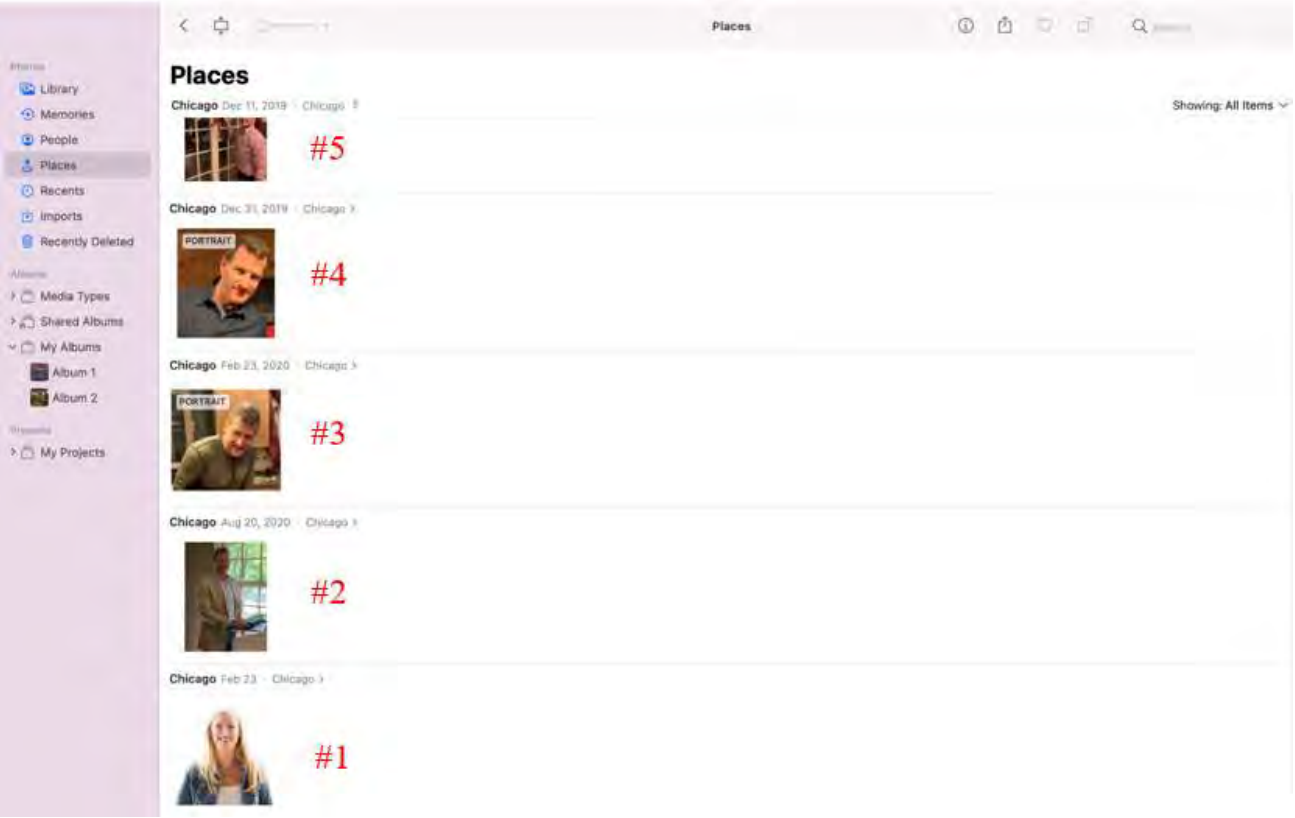
	
<p><b>12[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>12[a]</b> the first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files, and</p>	<p>The first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files.</p>

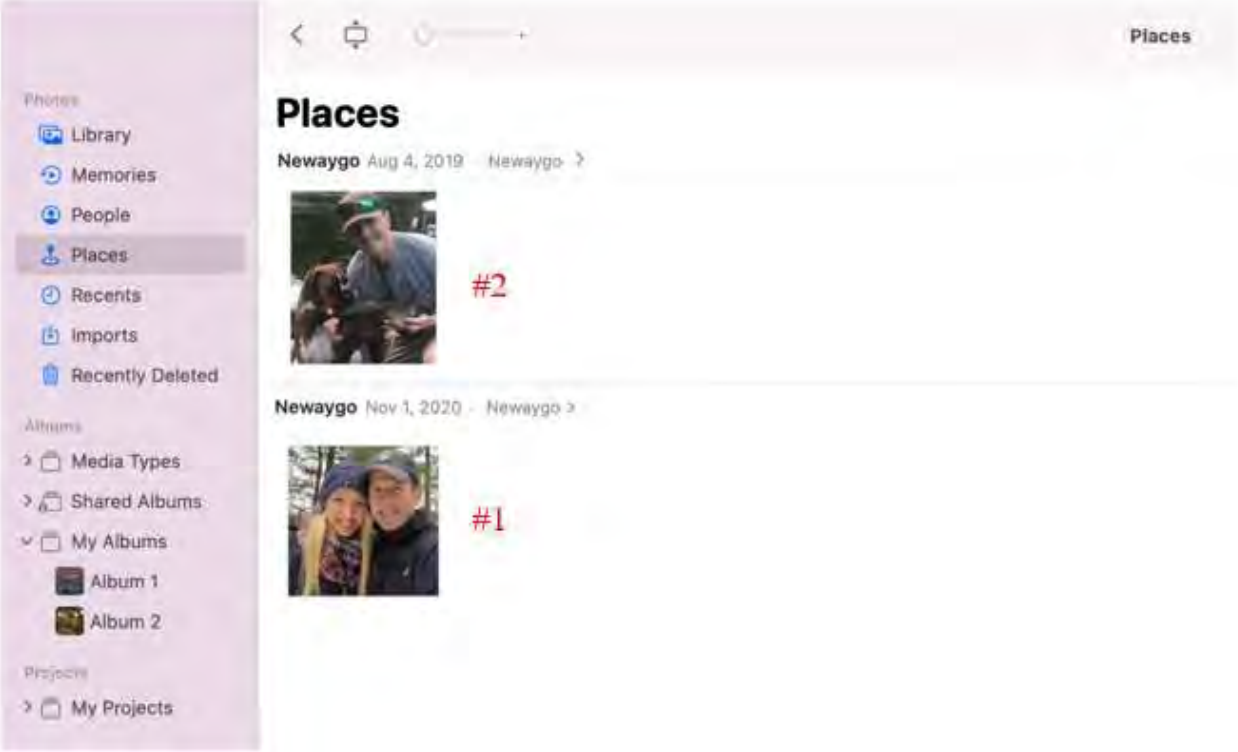
	 <p>first location selectable thumbnail image</p>
<p><b>12[b]</b> wherein the second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.</p>	<p>The second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.</p>

<p><b>14[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>14[a]</b> the first location view includes a representation of at least a portion of all of the digital files in the first set of digital files and</p>	<p>The first location view includes a representation of at least a portion of all of the digital files in the first set of digital files.</p>





	 <p>The screenshot shows the 'Places' view in the Photos app for the location 'Chicago'. The left sidebar contains navigation options: Library, Memories, People, Places (selected), Recents, Imports, Recently Deleted, Albums (Media Types, Shared Albums, My Albums, Album 1, Album 2), and My Projects. The main area displays a list of photos from Chicago, each with a red rank number: #5 (Dec 11, 2019), #4 (Dec 31, 2019), #3 (Feb 23, 2020), #2 (Aug 20, 2020), and #1 (Feb 23, 2020). The photos are arranged in a grid-like fashion with horizontal dividers between them.</p>
<p><b>14[b]</b> the second location view includes a representation of at least a portion of all of the digital files in the second set of digital files.</p>	<p>The second location view includes a representation of at least a portion of all of the digital files in the second set of digital files.</p>


	
<p><b>15[pre]</b> The method of claim 1, further comprising:</p>	<p>See information for claim 1.</p>
<p><b>15[a]</b> responsive to an input that is indicative of a selection, in the first location view, of the representation of the at least a portion of the one digital file in the first set of digital files, causing a</p>	<p>Responsive to an input that is indicative of a selection, in the first location view, of the representation of the at least a portion of the one digital file in the first set of digital files, the Apple Product causes a first digital file to be displayed on the interface.</p>

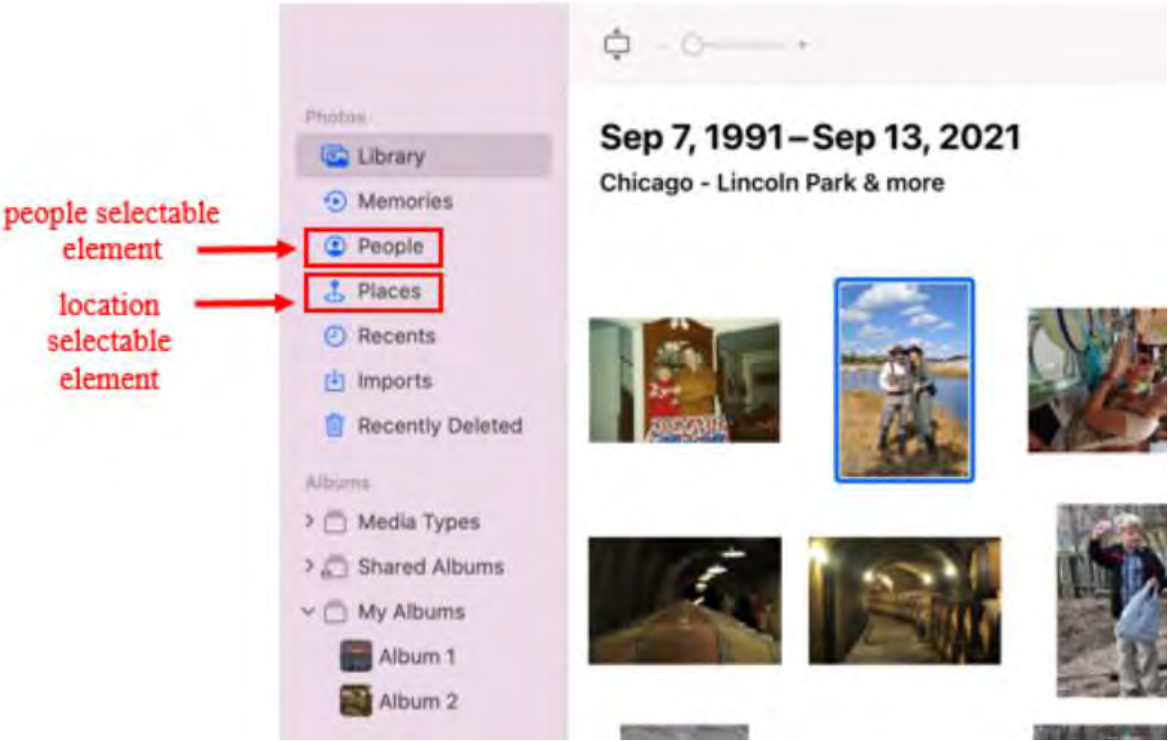
first digital file to be displayed on the interface; and



**15[b]** responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital files, causing a second digital file to be displayed on the interface.

Responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital files, the Apple Product causes a second digital file to be displayed on the interface.

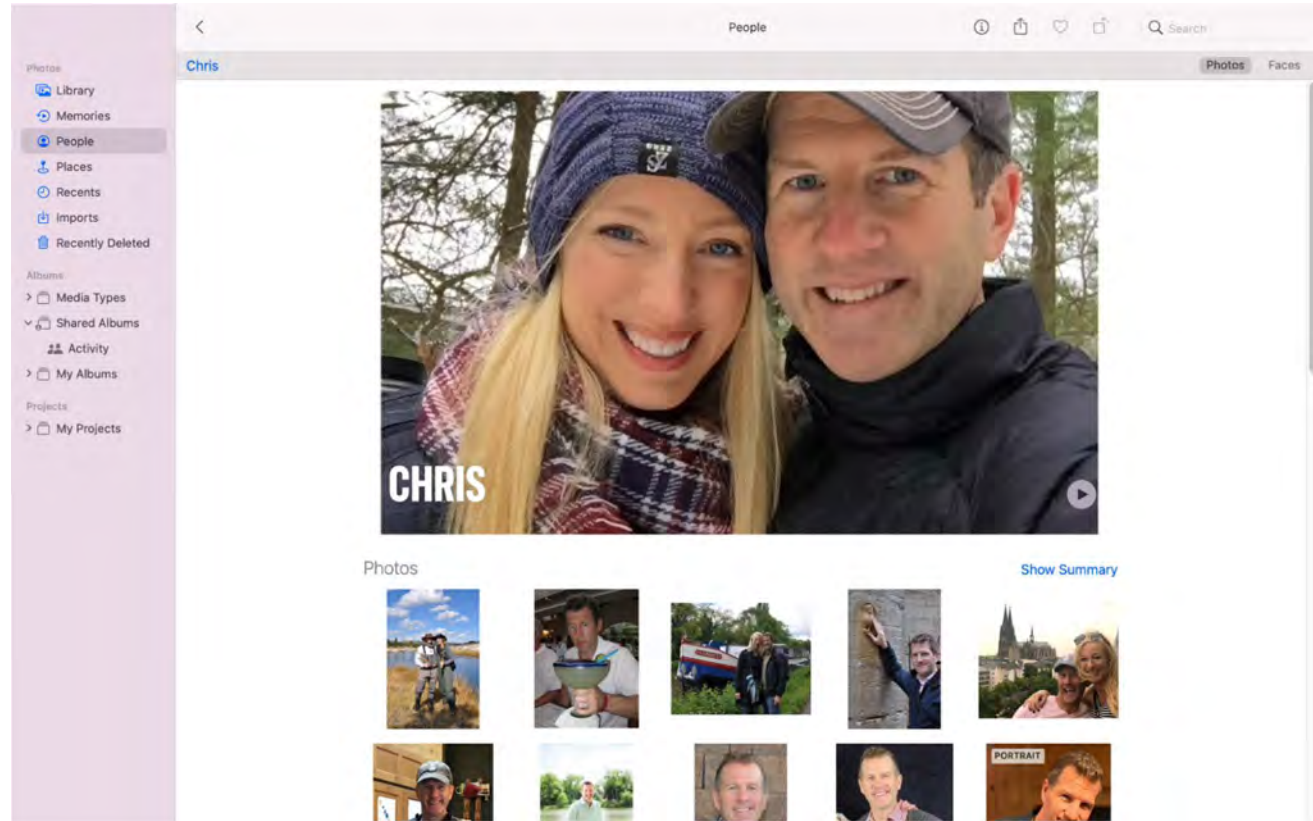
	
<p><b>17[a]</b> The method of claim 1, further comprising, prior to receiving the first input, causing the interface to display a plurality of selectable elements, the plurality of selectable elements including a location selectable</p>	<p>Prior to receiving the first input (see information for element 1[a]), the Apple Product causes the interface to display a plurality of selectable elements. The plurality of selectable elements includes a location selectable element and a people selectable element.</p>

<p>element and a people selectable element,</p>	
<p><b>17[b]</b> wherein the first input is indicative of a selection of the location selectable element, and</p>	<p>The first input is indicative of a selection of the location selectable element. <i>See</i> information for limitation 1[a].</p>
<p><b>17[c]</b> wherein the second input is indicative of a selection of the people selectable element.</p>	<p>The second input is indicative of a selection of the people selectable element. <i>See</i> information for limitation 1[d].</p>
<p><b>18[pre]</b> The method of claim 1, further comprising</p>	<p><i>See</i> information for claim 1.</p>



**18[a]** responsive to an input that is indicative of a selection of the first person selectable thumbnail image, causing a first person view to be displayed on the interface, the first person view including

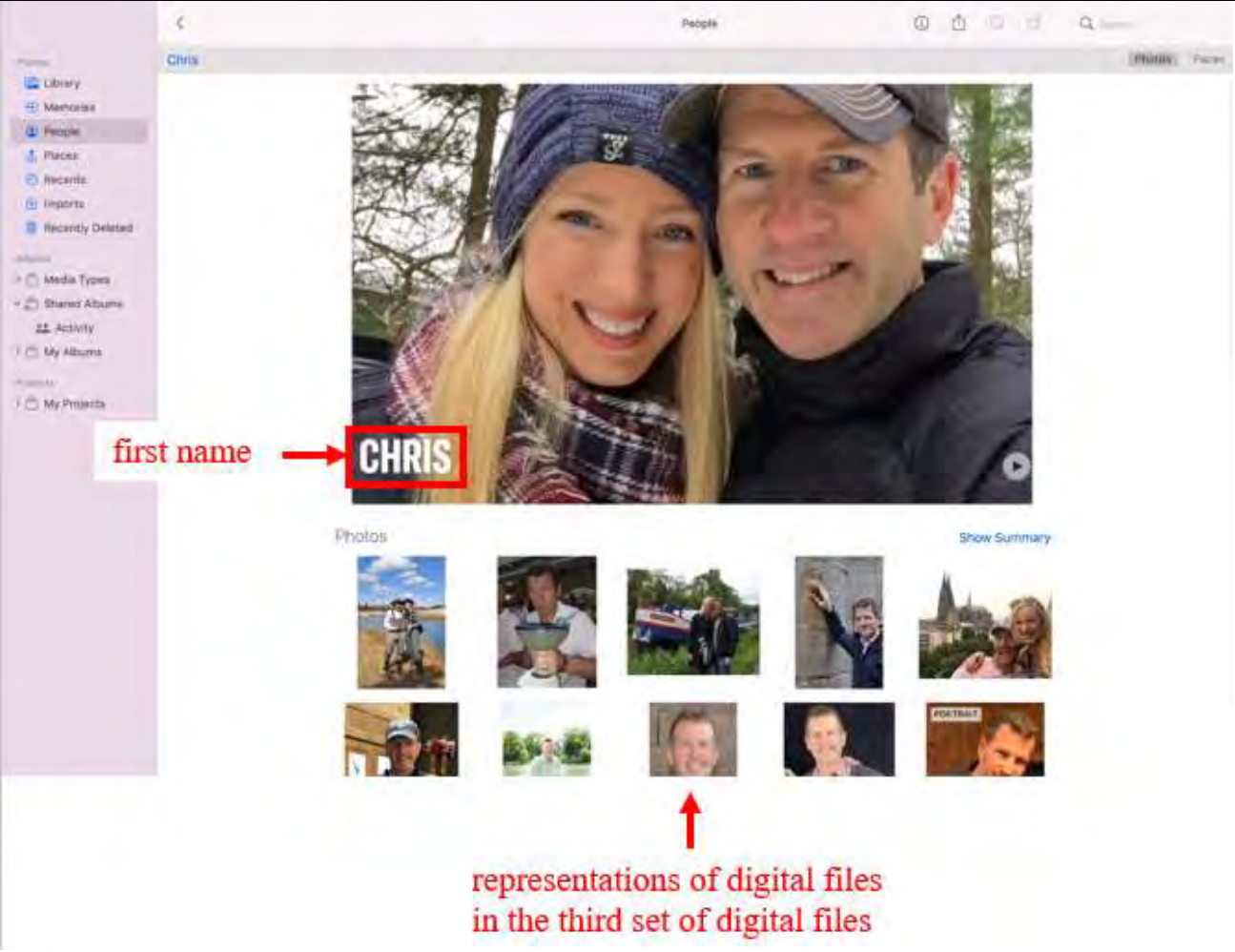
Responsive to an input that is indicative of a selection of the first person selectable thumbnail image, macOS displays a first person view on the interface.



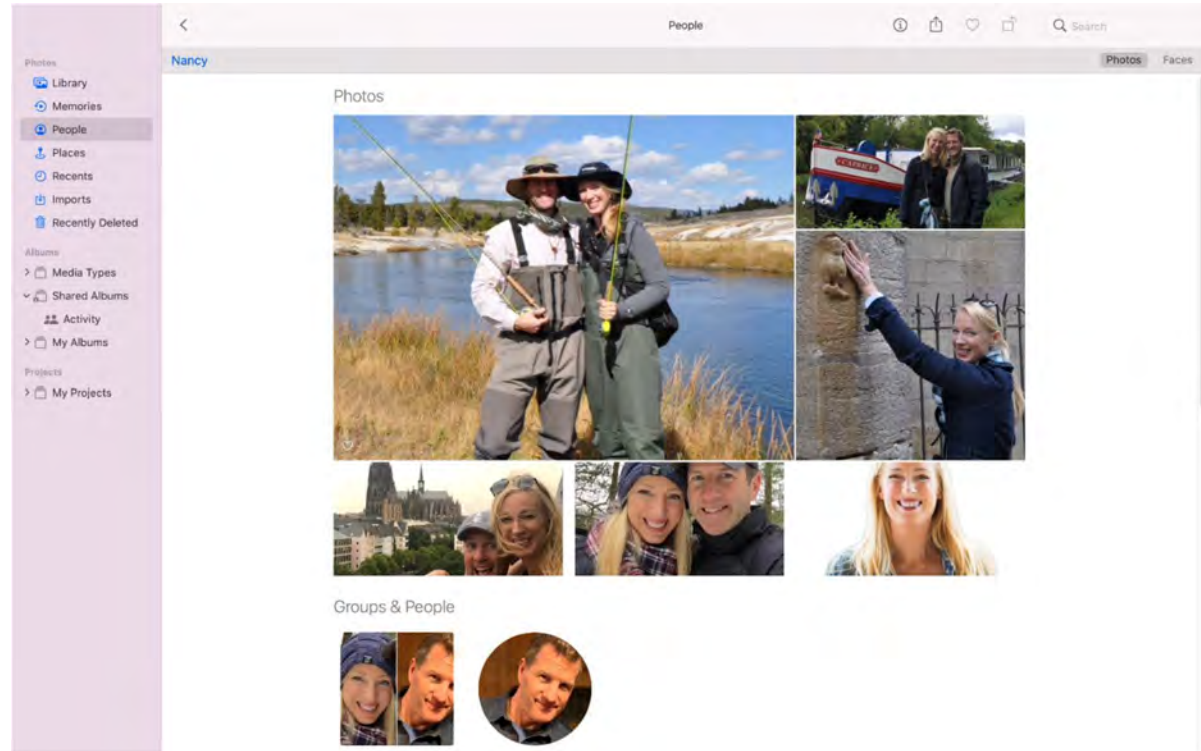
**18[b]** (i) the first name and (ii) a representation of each digital file in the third set of digital files.

The first person view includes the first name and a representation of each digital file in the third set of digital files.



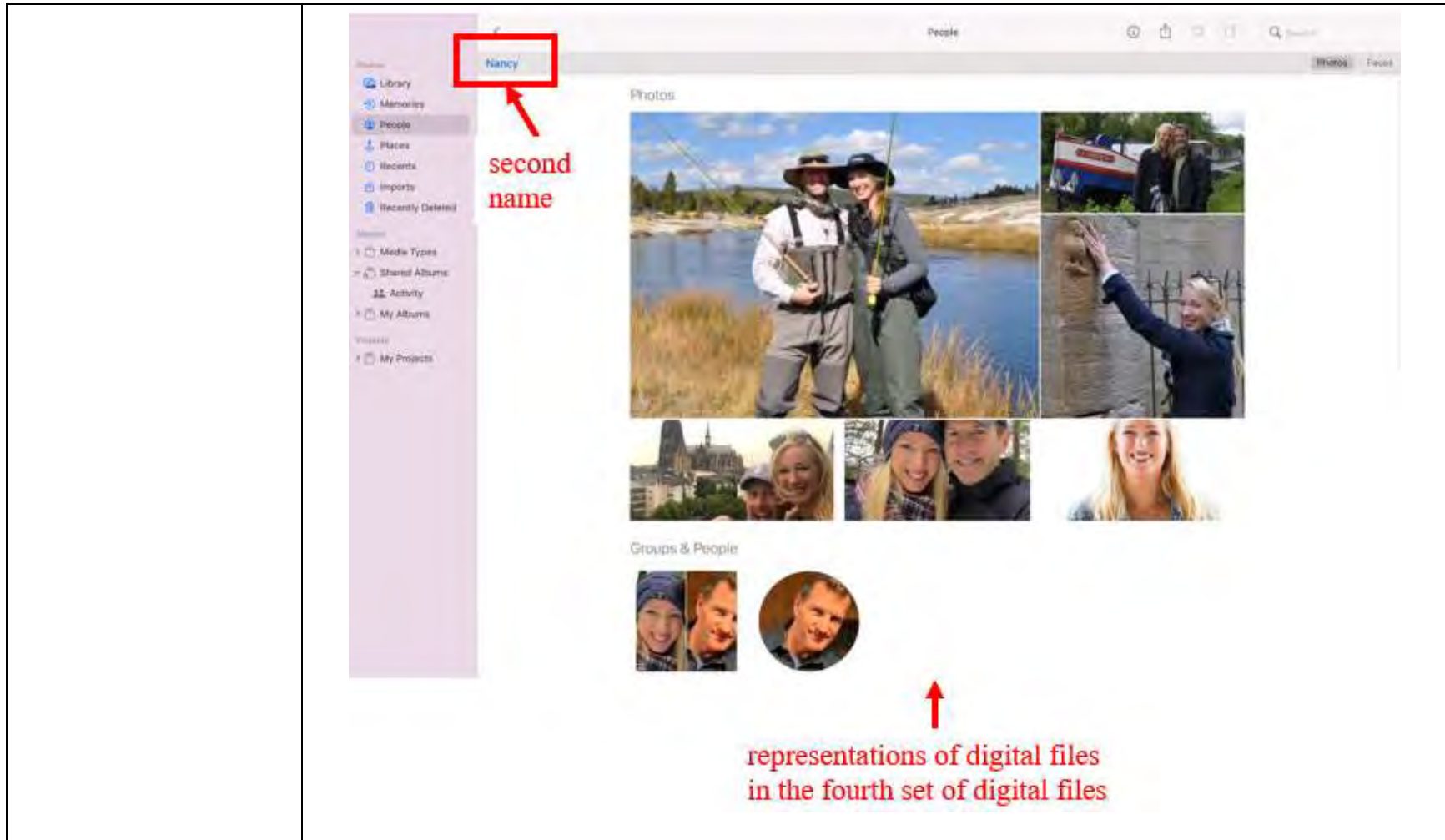
	 <p>first name → CHRIS</p> <p>representations of digital files in the third set of digital files</p>
<p><b>19[pre]</b> The method of claim 18, further comprising</p>	<p>See information for claim 18.</p>
<p><b>19[a]</b> responsive to an input that is indicative of</p>	<p>Responsive to an input that is indicative of a selection of the second person selectable thumbnail image, macOS 11 causes a second person view to be displayed on the interface.</p>

a selection of the second person selectable thumbnail image, causing a second person view to be displayed on the interface, the second person view including



**19[b]** (i) the second name and (ii) a representation of each digital file in the fourth set of digital files.

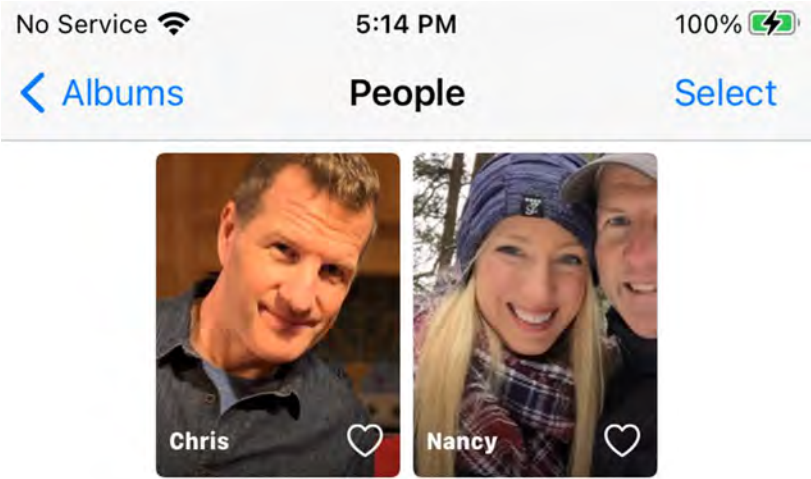
The second person view includes the second name and a representation of each digital file in the fourth set of digital files.

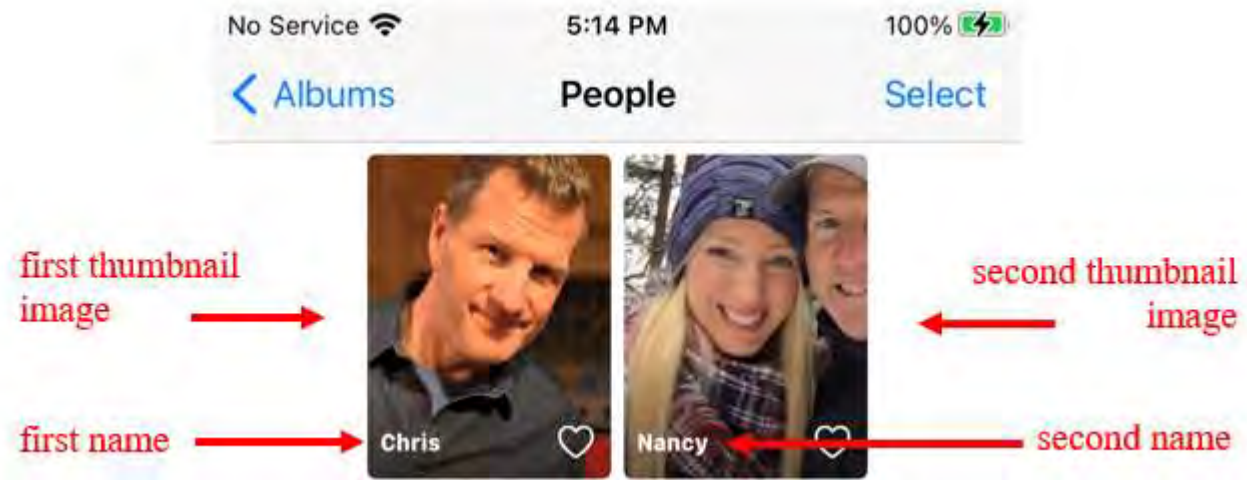


# **Exhibit D.1**

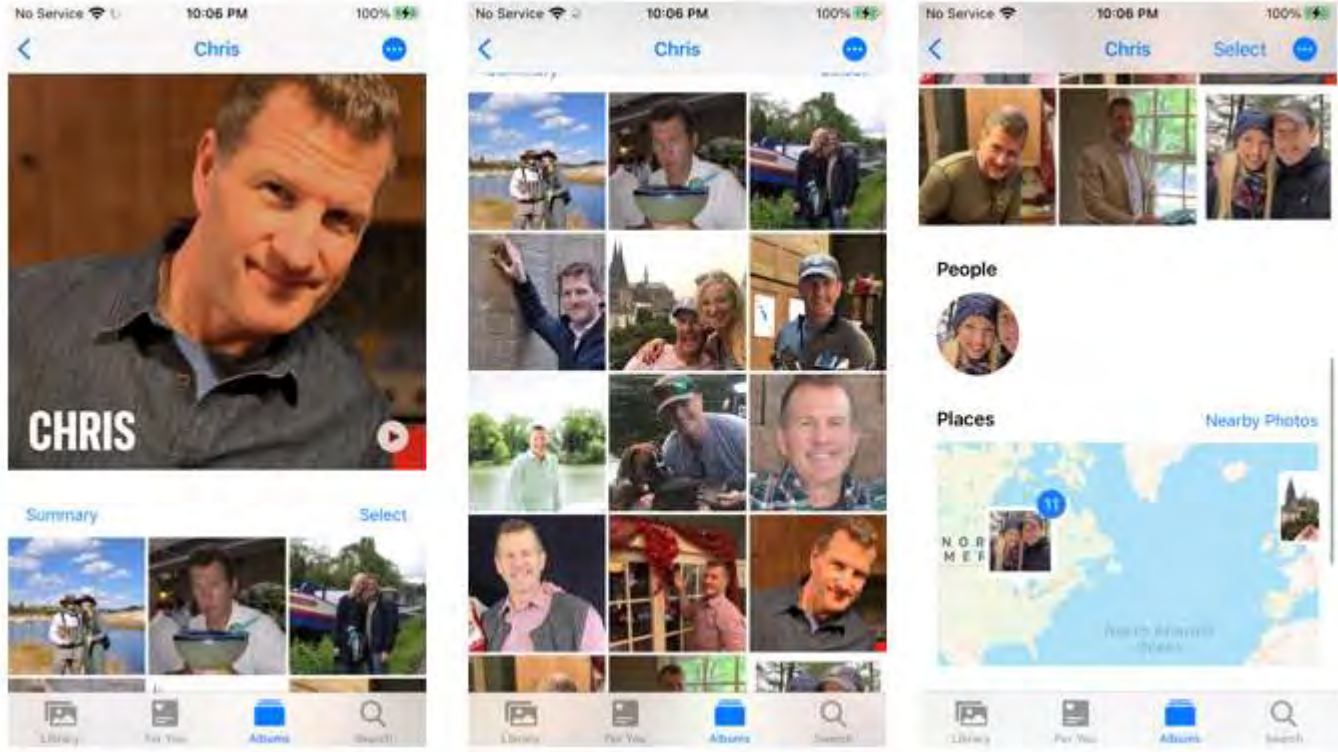
**U.S. Patent No. 11,017,020 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 11,017,020 (“the ‘020 patent”) in Apple iOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPhone 7 running iOS 14.7.1. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs, and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<p><b>1[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, iOS performs a method, as set forth below.</p>
<p><b>1[a]</b> causing an interface to display a people view, the people view including:</p>	<p>iOS causes an interface (e.g., Apple iPhone) to display a people view.</p> 

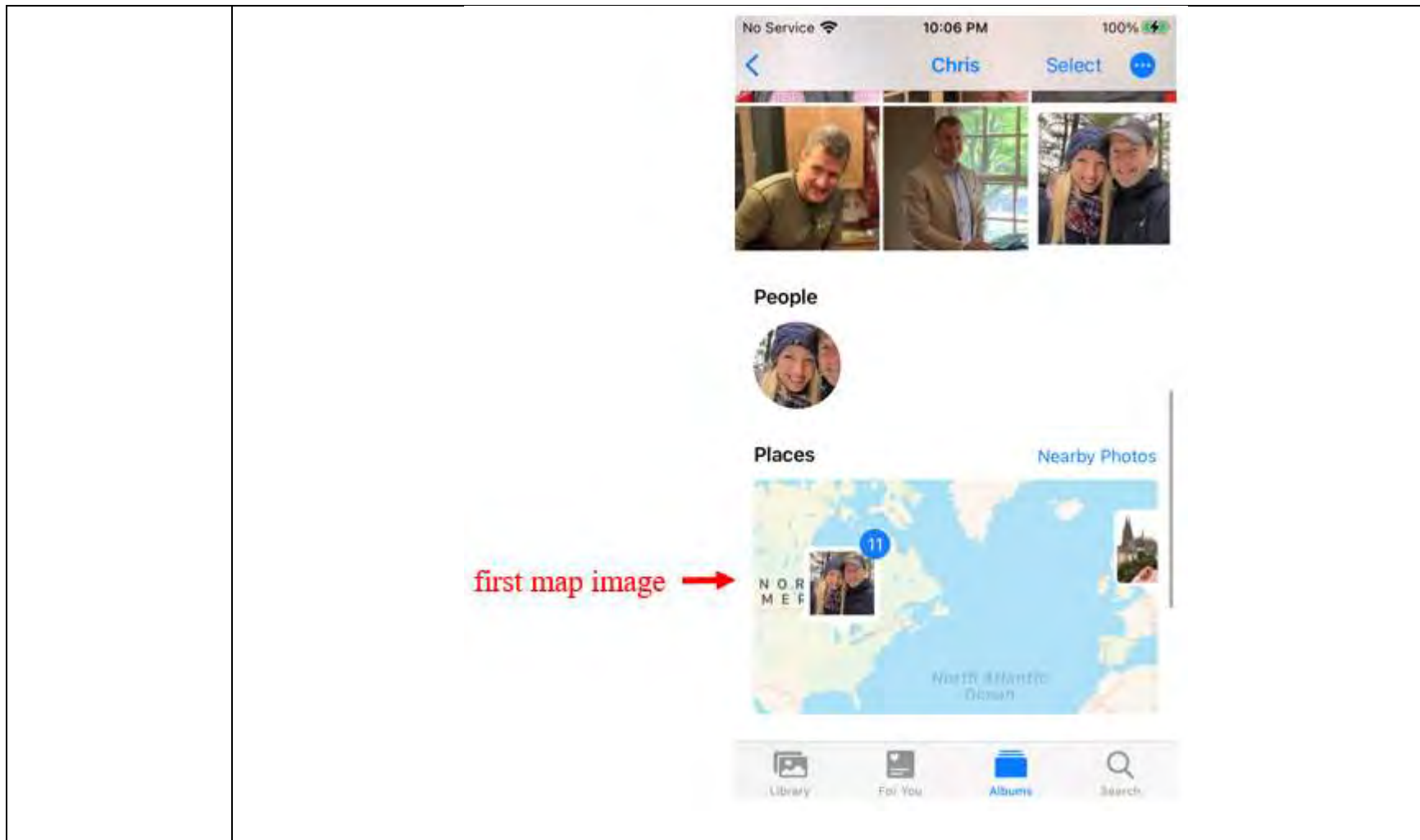
<p><b>1[a][i]</b> a first thumbnail image associated with a first person,  <b>1[a][ii]</b> a first name associated with the first person,  <b>1[a][iii]</b> a second thumbnail image associated with a second person, and  <b>1[a][iv]</b> a second name associated with the second person;</p>	<p>The people view includes (1) a first thumbnail image associated with a first person, (2) a first name associated with the first person, (3) a second thumbnail image associated with a second person, and (4) a second name associated with the second person.</p>  <p>The screenshot shows the 'People' view on an iPhone. At the top, there is a status bar with 'No Service', '5:14 PM', and '100%' battery. Below the status bar are navigation options: '&lt; Albums', 'People', and 'Select'. The main content area displays two people. The first person is 'Chris', with a red arrow pointing from the label 'first thumbnail image' to his photo and another red arrow pointing from 'first name' to his name. The second person is 'Nancy', with a red arrow pointing from the label 'second thumbnail image' to her photo and another red arrow pointing from 'second name' to her name. Both photos have a small heart icon in the bottom right corner.</p>
<p><b>1[b]</b> responsive to an input that is indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:</p>	<p>Responsive to an input that is indicative of a selection associated with the first person (e.g., tapping the first thumbnail image in the people view), iOS causes a first person view to be displayed on the interface.</p>



	
<p><b>1[b](i)</b> a first digital file associated with the first person, <b>1[b](ii)</b> the first name associated with the first person, and</p>	<p>The first person view includes a first digital file associated with the first person and the first name associated with the first person.</p>

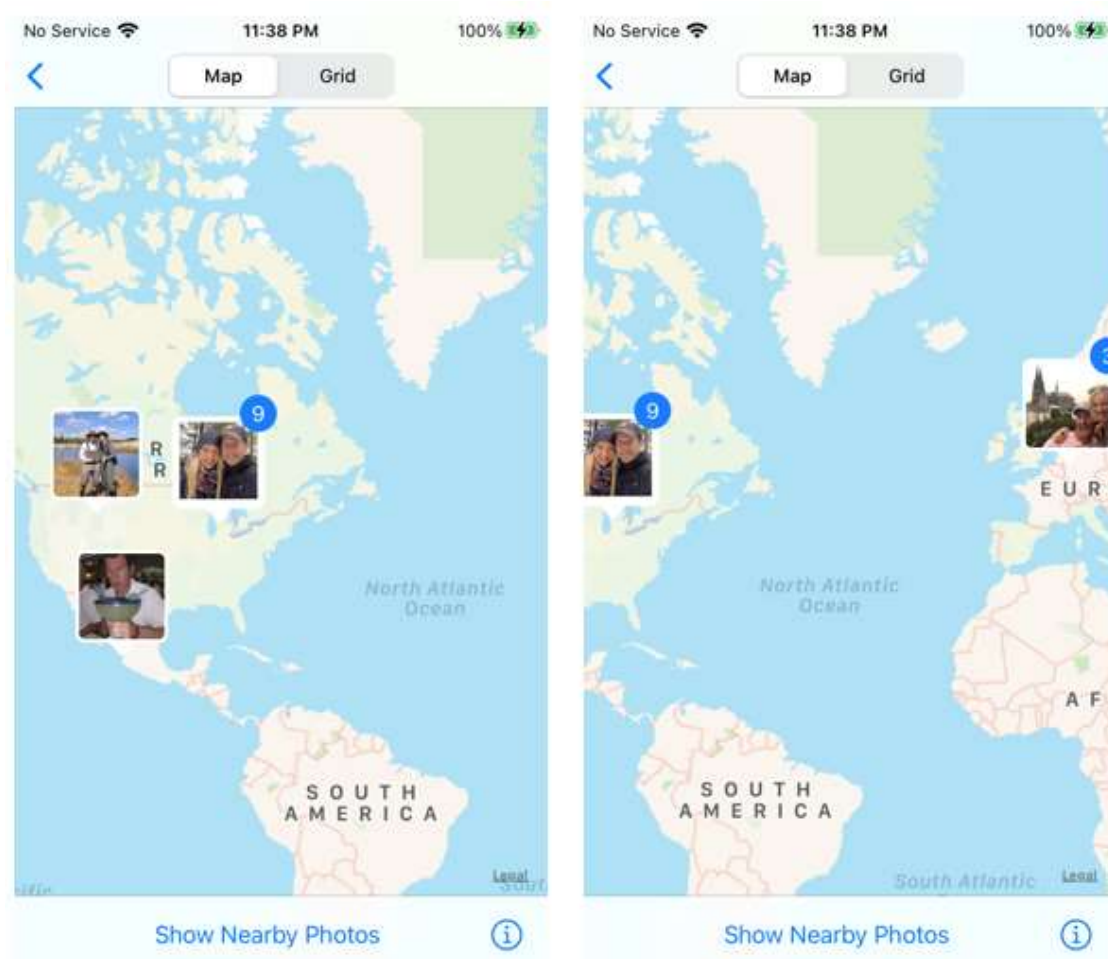


	 <p>The screenshot shows an iPhone contact card for a person named Chris. At the top, the status bar displays 'No Service', signal strength, Wi-Fi, the time '10:07 PM', and '100%' battery. The contact name 'Chris' is centered at the top. Below the name is a large portrait photo of a man with short brown hair, wearing a grey button-down shirt. A red arrow labeled 'first name' points to the name 'Chris' at the top. Another red arrow labeled 'first digital file' points to the portrait photo. A third red arrow labeled 'first name' points to the name 'CHRIS' overlaid in white text at the bottom left of the photo. Below the photo is a 'Summary' section with three small thumbnail images: two people on a boat, a man eating, and a man with a camera. A 'Select' button is to the right. At the bottom is a navigation bar with icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>1[b][iii]</b> a first map image;</p>	<p>The first person view also includes a first map image.</p>



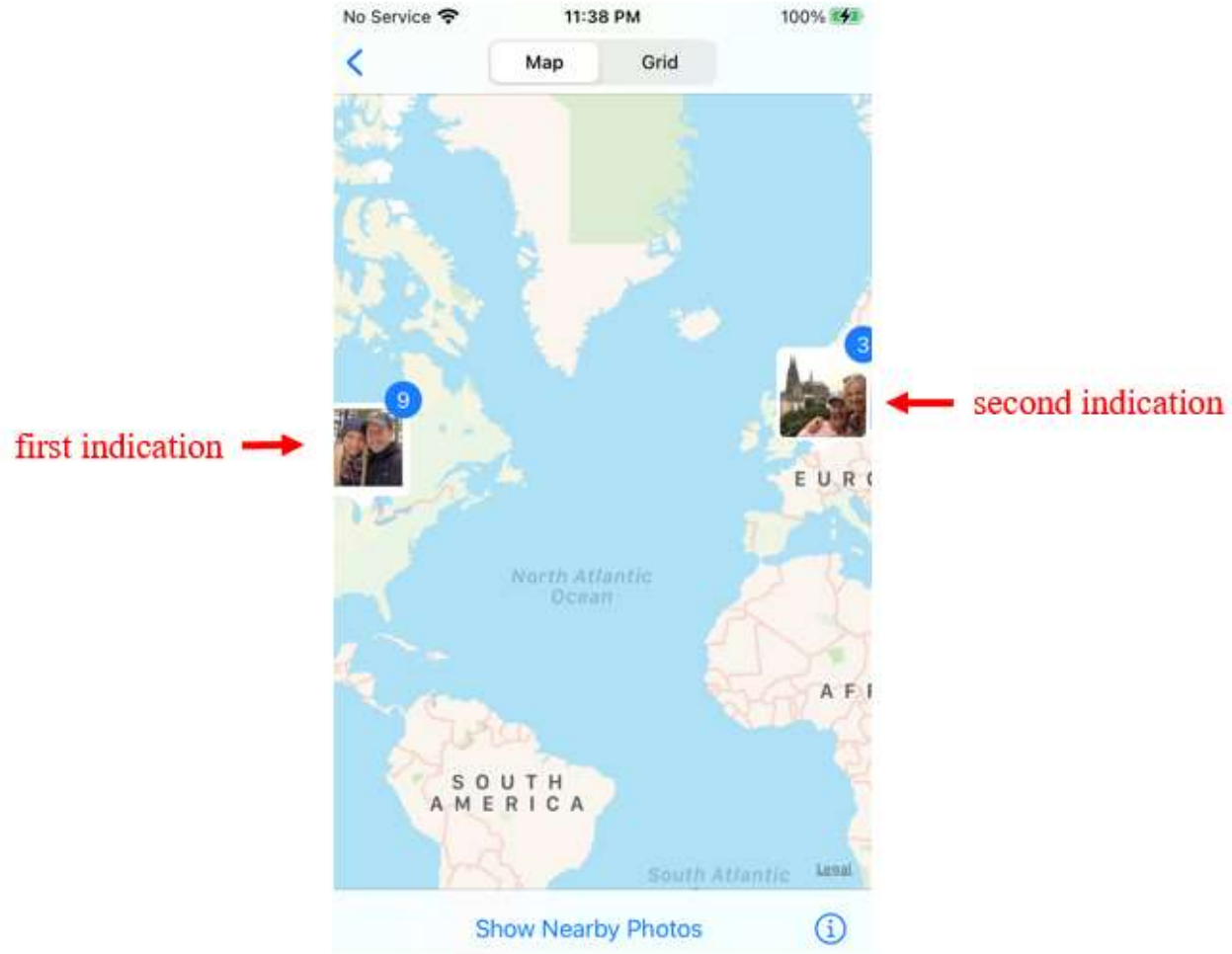
**1[c]** responsive to an input that is indicative of a selection of the first map image in the first person view, causing a first location view to be displayed on the interface, the first location view including: **1[c][i]** an interactive geographic map,

Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), iOS causes a first location view to be displayed on the interface. The first location view includes an interactive geographic map. The geographic is interactive in that iOS can zoom in or out, or move side to side.



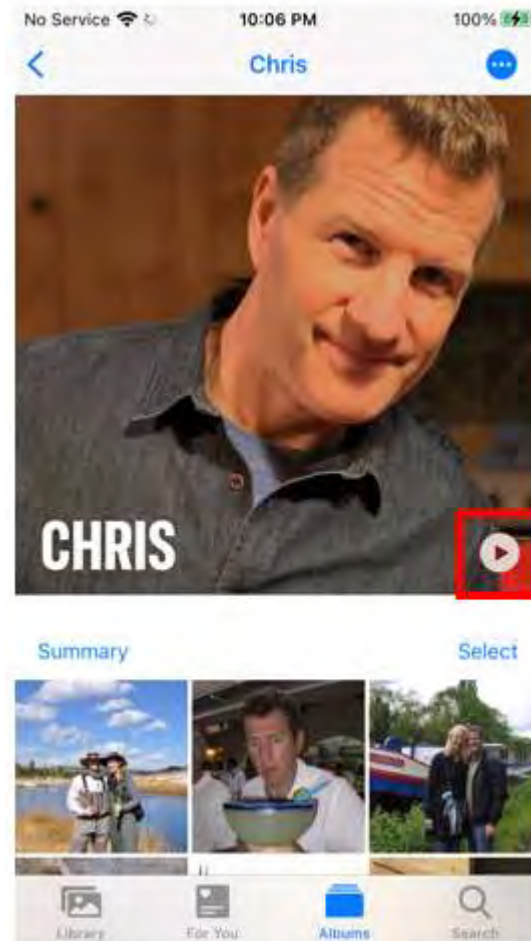
**1[c][ii]**  
a first indication positioned at a first location on the interactive geographic map, and **1[c][iii]**  
a second indication positioned at a second location on the interactive geographic map;  
and

The first location view includes a first indication positioned at a first location on the interactive geographic map and a second indication positioned at a second location on the interactive geographic map.



**1[d]** responsive to an input that is indicative of a selection of the first digital file in the first person view, causing a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.

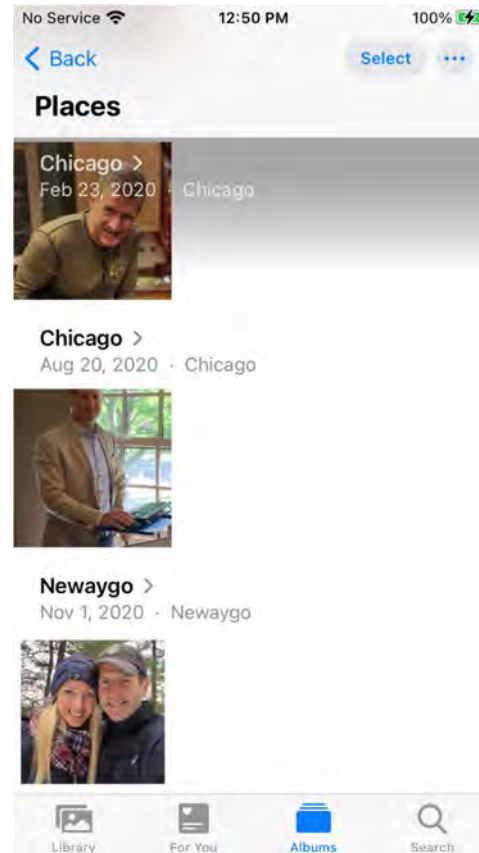
Responsive to an input that is indicative of a selection of the first digital file in the first person view (e.g., the “Play” element annotated below), iOS causes a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.



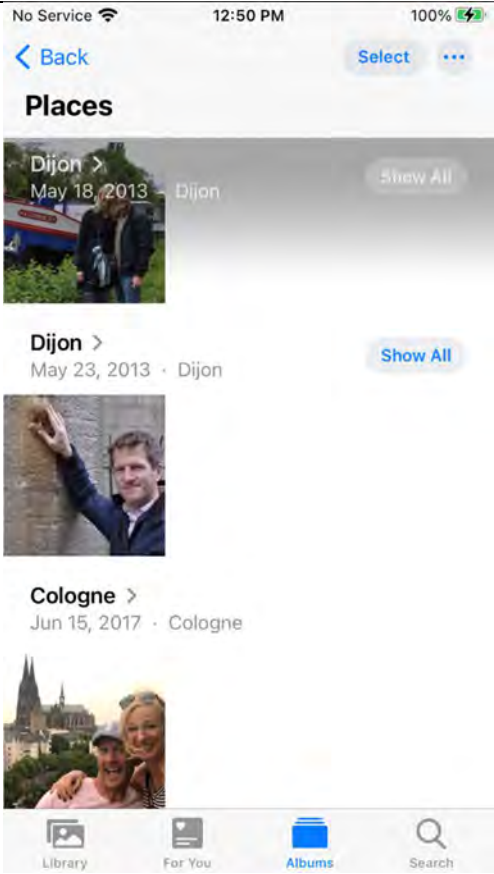
See MW Apple 003185 for an exemplary slideshow.

2. The method of claim 1, wherein the first indication is associated with a first set of digital files and the first location, and the second indication is associated with a second set of digital files and the second location.

The first indication is associated with a first set of digital files and the first location. For example, iOS causes the view below to be displayed responsive to a selection of the first indication.

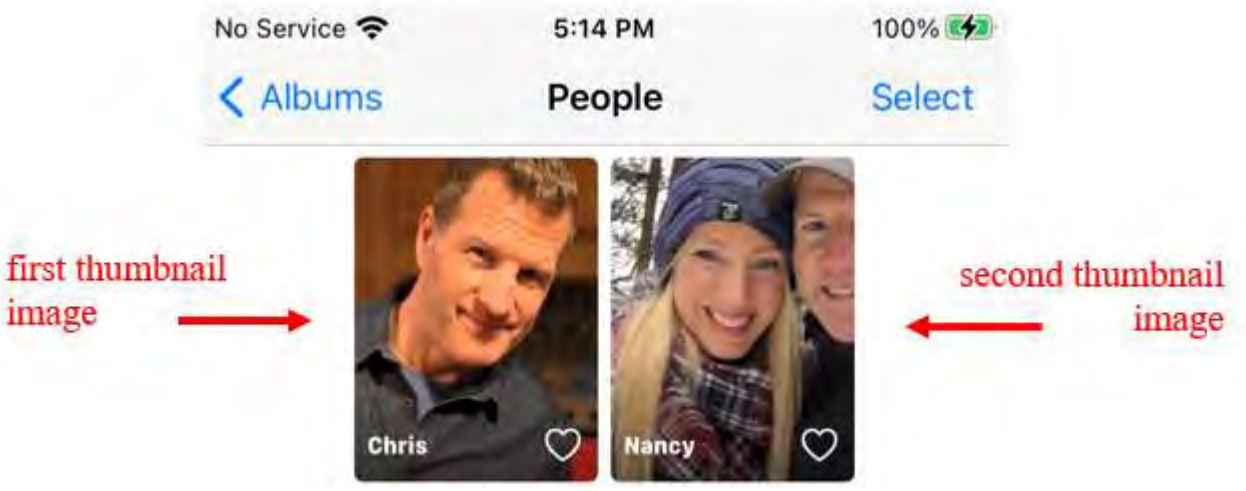


The second indication is associated with a second set of digital files and the second location. For example, iOS causes the view below to be displayed responsive to a touch/tap of the second indication.

	 <p>The screenshot shows the 'Places' section of the Photos app. At the top, it says 'No Service', '12:50 PM', and '100%' battery. Below the 'Places' header, there are three entries: 'Dijon &gt;' with a date of 'May 18, 2013' and a 'Show All' button; another 'Dijon &gt;' entry with a date of 'May 23, 2013' and a 'Show All' button; and 'Cologne &gt;' with a date of 'Jun 15, 2017' and a 'Show All' button. The bottom dock shows icons for Library, For You, Albums, and Search.</p>
<p><b>3.</b> The method of claim 2, wherein the first set of digital files and the second set of digital files are associated with the first person.</p>	<p>The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first and second sets of digital files include photographs of the first person.</p>

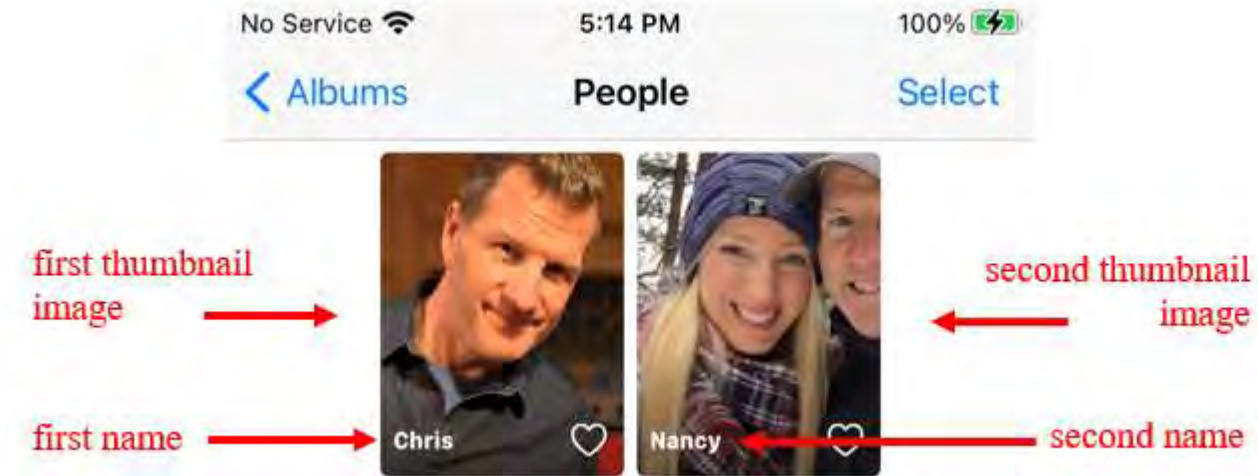


<p>4. The method of claim 3, wherein the first thumbnail image includes at least a portion of a face of the first</p>	<p>The first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>

<p>person and the second thumbnail images includes at least a portion of a face of the second person.</p>	 <p>The screenshot shows the 'People' view in an iPhone Photos app. At the top, the status bar displays 'No Service', '5:14 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Albums', 'People', and 'Select'. Two person thumbnails are shown. The first thumbnail is of a man labeled 'Chris' with a heart icon below it. The second thumbnail is of a woman labeled 'Nancy' with a heart icon below it. Red text 'first thumbnail image' with a red arrow points to the Chris thumbnail. Red text 'second thumbnail image' with a red arrow points to the Nancy thumbnail.</p>
<p><b>5.</b> The method of claim 4, wherein the first thumbnail image includes at least a portion of the first digital file.</p>	<p>The first thumbnail image in the people view includes at least a portion of the first digital file in the first person view.</p>

	<p>The image contains two screenshots from an iPhone Photos app. The left screenshot shows the 'People' view with two thumbnails labeled 'Chris' and 'Nancy'. A red arrow points from the text 'first thumbnail image' to the 'Chris' thumbnail. The right screenshot shows the 'Chris' contact page with a large photo of Chris and a 'Summary' section below it. A red arrow points from the text 'first digital file' to the top of the large photo.</p>
<p>6. The method of claim 4, wherein, in the people view, the first name is displayed adjacent to the first digital file associated with the first</p>	<p>In the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image and the second name is displayed adjacent to the second thumbnail image.</p>

thumbnail image and the second name is displayed adjacent to the second thumbnail image.

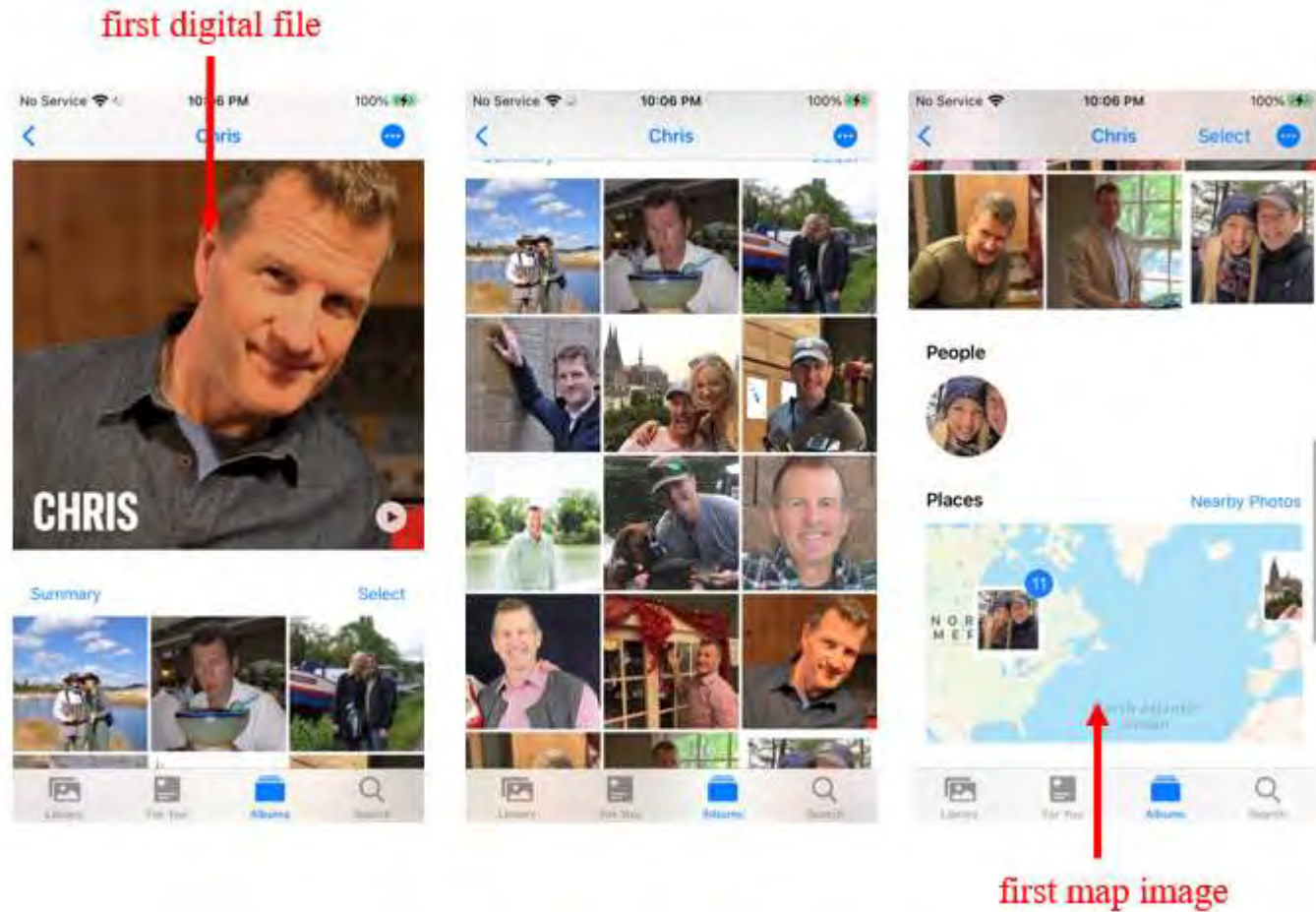


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate the name of the first person that is associated with the first thumbnail image. The way the claimed displaying performs this function is by displaying the first name in sufficient proximity to the first thumbnail image such that a user will associate the first name with the first thumbnail image. The result of the claimed displaying is that the first name is associated with the first thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name is to communicate the name of the second person that is associated with the second thumbnail image. The way the claimed displaying performs this function is by displaying the second name in sufficient proximity to the second thumbnail image such that a user will associate the second name with the second thumbnail image. The result of the claimed displaying is that the second name is associated with the second thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

7. The method of claim 6, wherein, in the first person view, the first map image is positioned below the first digital file.


In the first person view, the first map image is positioned below the first digital file.



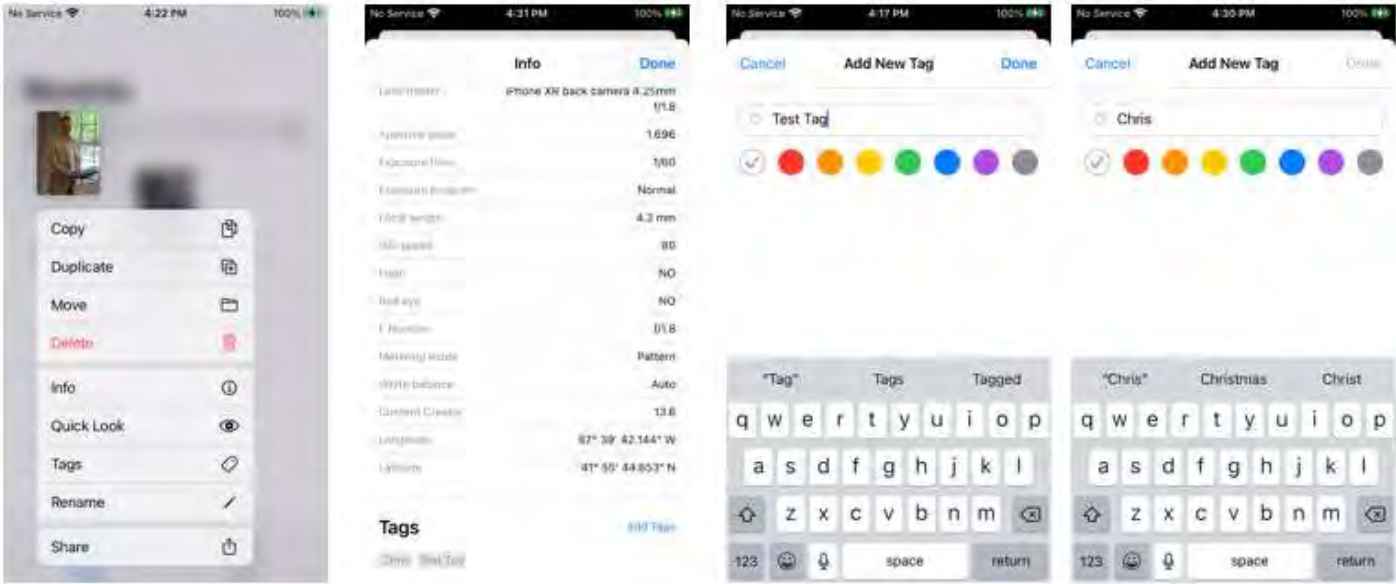
8[pre] The method of claim 1, further comprising, prior

See information for claim 1.




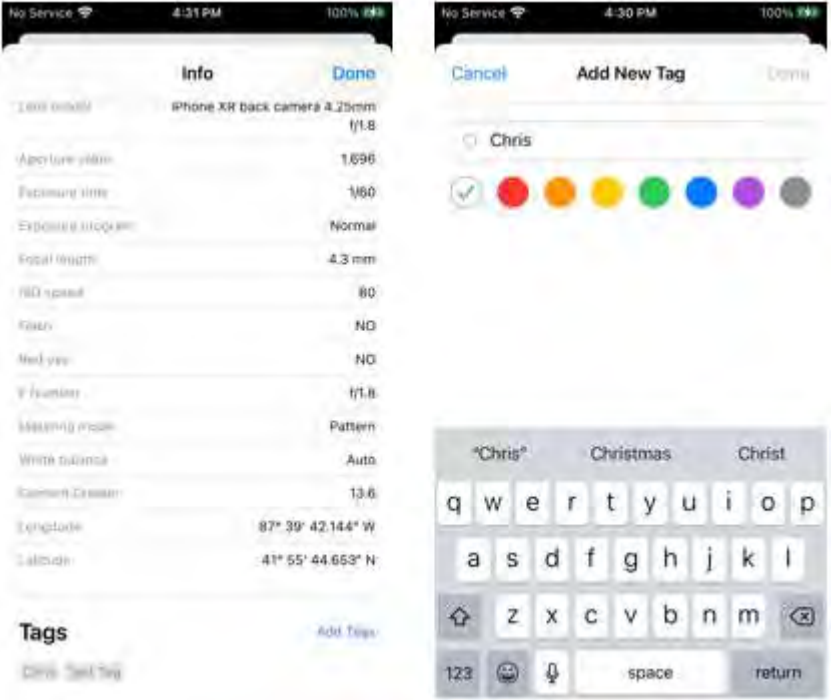
<p>to the causing the interface to display the people view:</p>	
<p><b>8[a]</b> causing the first digital file to be displayed on the interface;</p>	<p>Prior to the causing the interface to display the people view, iOS causes the first digital file to be displayed on the interface.</p>  <p>The screenshot shows an iPhone photo gallery interface. At the top, it displays the date 'Feb 23, 2020' and the location 'Chicago - Lincoln Park'. Below this is a grid of photos. A red box highlights the first photo in the grid, which shows a man in a suit. The interface includes a 'Select' button and a 'More' menu icon in the top right corner. At the bottom, there are navigation options for 'Years', 'Months', 'Days', and 'All Photos', along with icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>8[b]</b> receiving alphanumeric text as a first user-generated tag; and</p>	<p>iOS receives alphanumeric text as a first user-generated tag. As a first example, iOS receives alphanumeric text as a first user-generated tag via the Files application.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

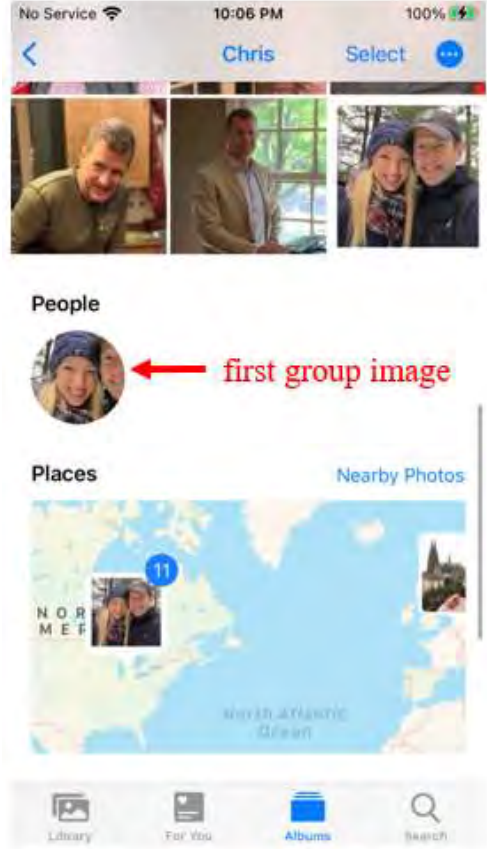
	 <p>As a second example, iOS receives alphanumeric text as a first user-generated tag via the Photos application when Photos initially recognizes faces in photographs/videos.</p>
<p>8[c] associating the first digital file with the first user-generated tag.</p>	<p>iOS associates the first digital file with the first user-generated tag.</p>




	 <p>In examples where iOS receives alphanumeric text as a first user-generated tag via the Photos application when Photos initially recognizes faces, that tag is associated with the first digital file.</p>
<p><b>9.</b> The method of claim 8, wherein the first user-generated tag includes the name of the first person.</p>	<p>The first user-generated tag can include the name of the first person.</p>

	 <p>This is also true when tagging digital files after Photos recognizes faces.</p>
<p><b>10.</b> The method of claim 9, further comprising exporting the first digital file to a remote device, the exported first digital file including information</p>	<p>iOS exports the first digital file to a remote device, and the exported first digital file includes information associated with the first user-generated tag. For example, iOS can export the first digital file to a remote device such as an Apple MacBook (e.g., via AirDrop). Information associated with the first user-generated tag is exported to the MacBook, as shown below.</p>

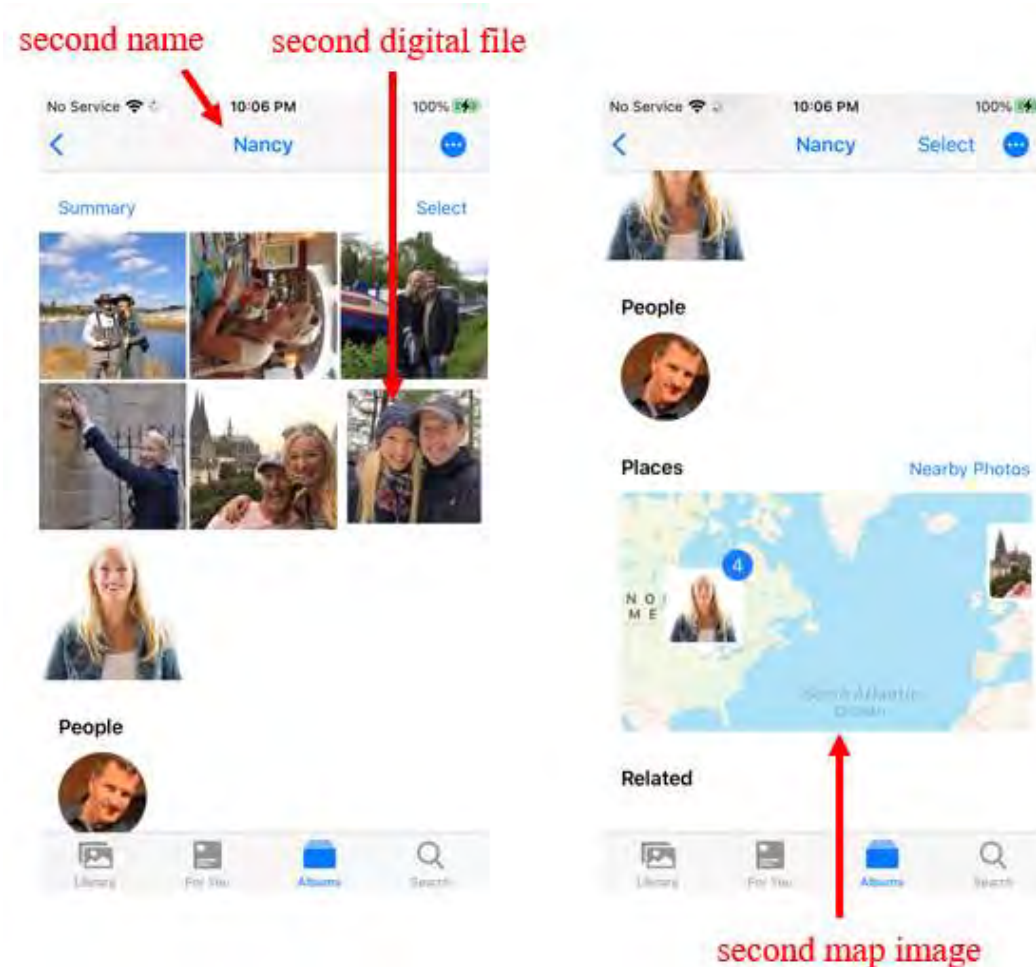
<p>associated with the first user-generated tag.</p>	
<p><b>11[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>11[a]</b> the first person view includes a first group image, and</p>	<p>The first person view includes a first group image.</p>

	 <p>The screenshot shows an iPhone photo gallery interface for a contact named "Chris". At the top, there are three photo thumbnails. Below them is a "People" section with a circular profile picture of a woman. A red arrow points to this profile picture with the text "first group image". Below the profile picture is a "Places" section with a map of North America and a "Nearby Photos" link. The bottom navigation bar shows "Library", "For You", "Albums", and "Search".</p>
<p><b>11[b]</b> responsive to an input that is indicative of a selection of the first group image, causing a first group view to be displayed on the interface, the first</p>	<p>Responsive to an input that is indicative of a selection of the first group image (e.g., tapping the first group image), iOS causes a first group view to be displayed on the interface, the first group view including one or more digital files associated with another person that is associated with the first person.</p>

<p>group view including one or more digital files associated with another person that is associated with the first person.</p>	
<p><b>12.</b> The method of claim 11, wherein the another person is the second person.</p>	<p>The another person is the second person. <i>See</i> information for limitations 1[a][iii]-[iv] and claim 11.</p>

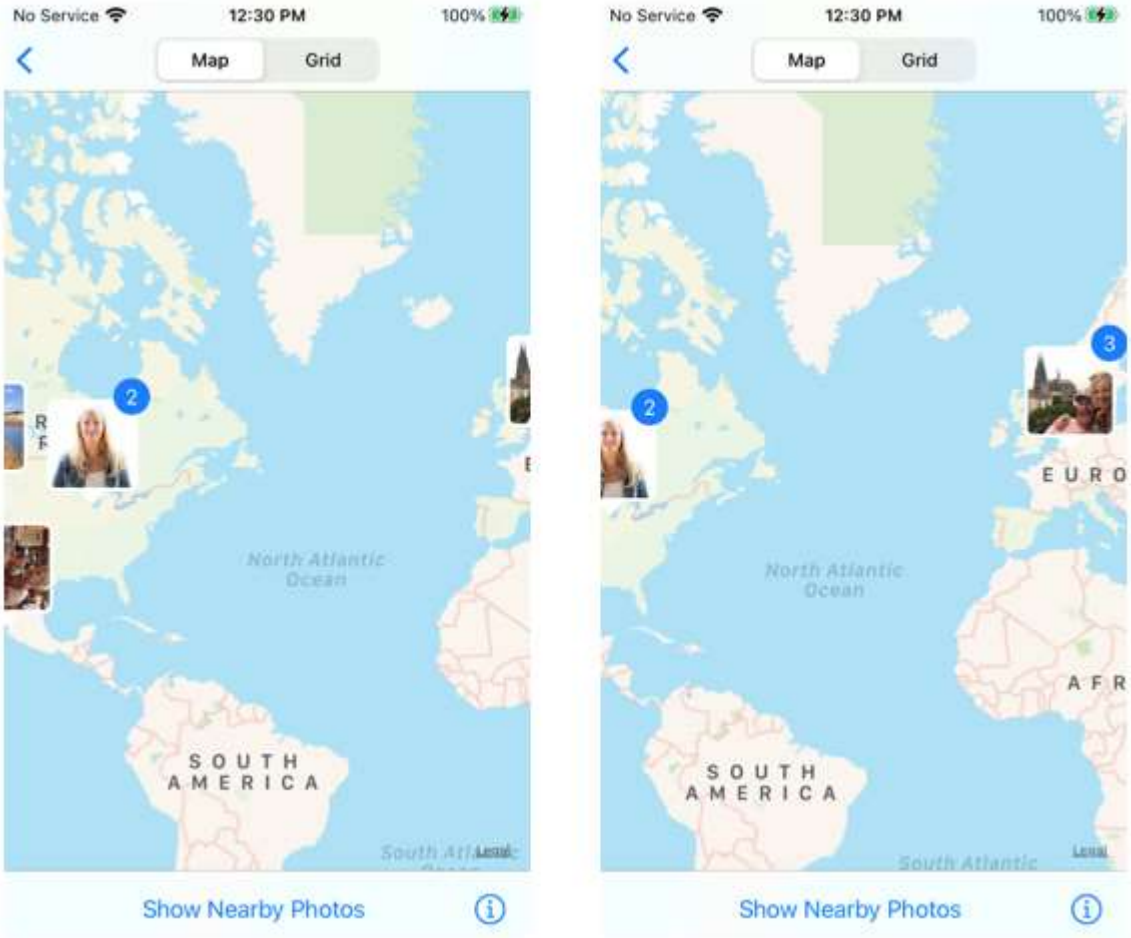
**13.** The method of claim 3, further comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.

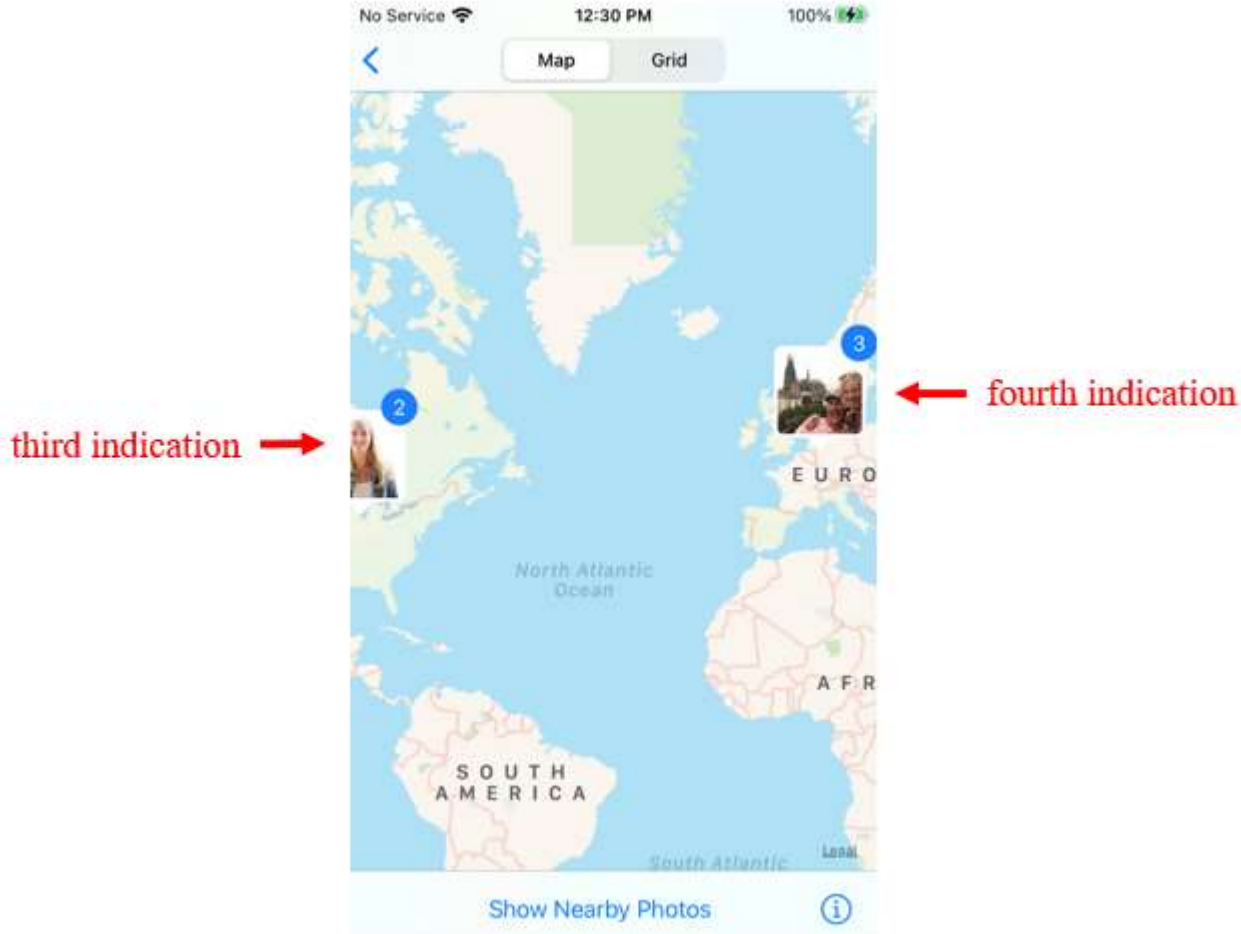
Responsive to an input that is indicative of a selection associated with the second person, iOS causes a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.



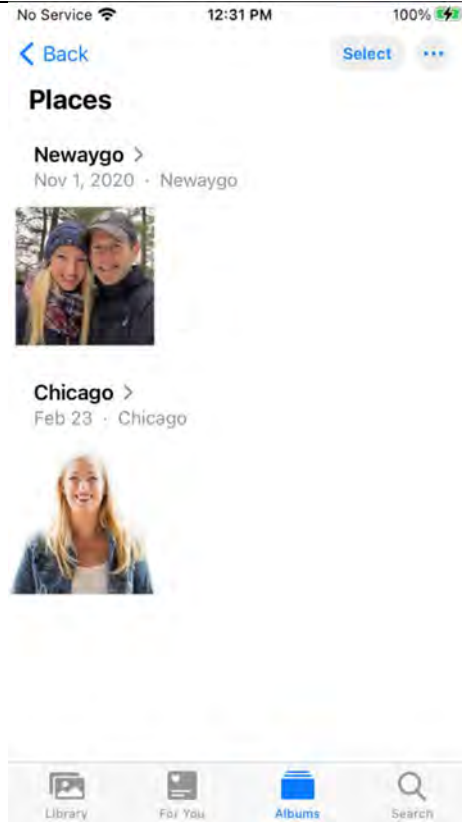


<p><b>14[pre]</b> The method of claim 13, further comprising:</p>	<p><i>See</i> information for claim 13.</p>
<p><b>14[a]</b> responsive to an input that is indicative of a selection of the second map image in the second person view, causing a second location view to be displayed on the interface, <b>14[b]</b> the second location view including: the interactive geographic map,</p>	<p>Responsive to an input that is indicative of a selection of the second map image in the second person view (e.g., tapping the second map image), iOS causes a second location view to be displayed on the interface. The second location view includes an interactive geographic map. The geographic is interactive in that iOS can zoom in or out, or move side to side.</p>

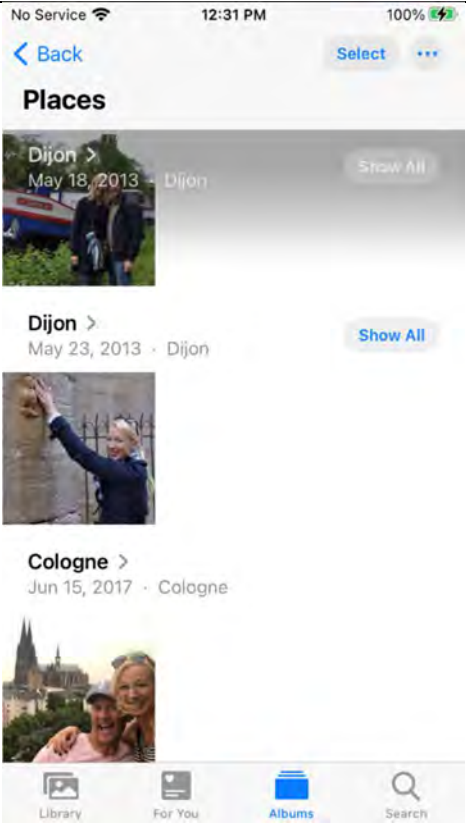
	 <p>The image displays two side-by-side screenshots of an iPhone map application. Both screenshots show a world map centered on the North Atlantic Ocean. The top status bar of each screenshot indicates 'No Service', '12:30 PM', and '100%' battery. Below the status bar, there are navigation buttons for 'Map' and 'Grid'. The map shows several photo thumbnails with blue circular indicators containing numbers. In the left screenshot, there are two indicators: '2' on a photo of a woman and '1' on a photo of a building. In the right screenshot, there are three indicators: '2' on the same woman photo, '1' on the same building photo, and '3' on a new photo of a group of people. The map also shows labels for 'SOUTH AMERICA', 'North Atlantic Ocean', 'South Atlantic Ocean', 'EURO', and 'AFR'. At the bottom of each screenshot, there is a 'Show Nearby Photos' button and an information icon.</p>
<p><b>14[c]</b> a third indication positioned at a third location on the interactive</p>	<p>The second location view includes the interactive geographic map, a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.</p>

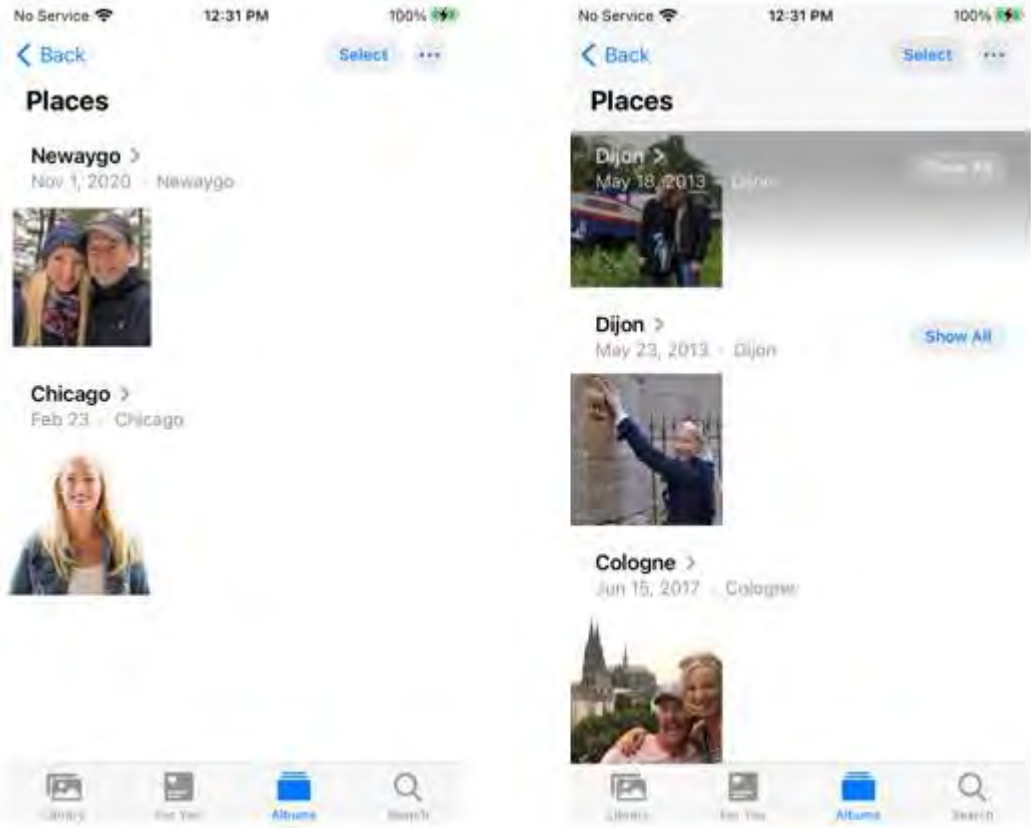
<p>geographic map, and <b>14[d]</b> a fourth indication positioned at a fourth location on the interactive geographic map.</p>	
<p><b>15.</b> The method of claim 14, wherein the third indication is associated with a third set of digital files and</p>	<p>The third indication is associated with a third set of digital files and the third location. For example, iOS displays the view below responsive to tapping the third indication.</p>

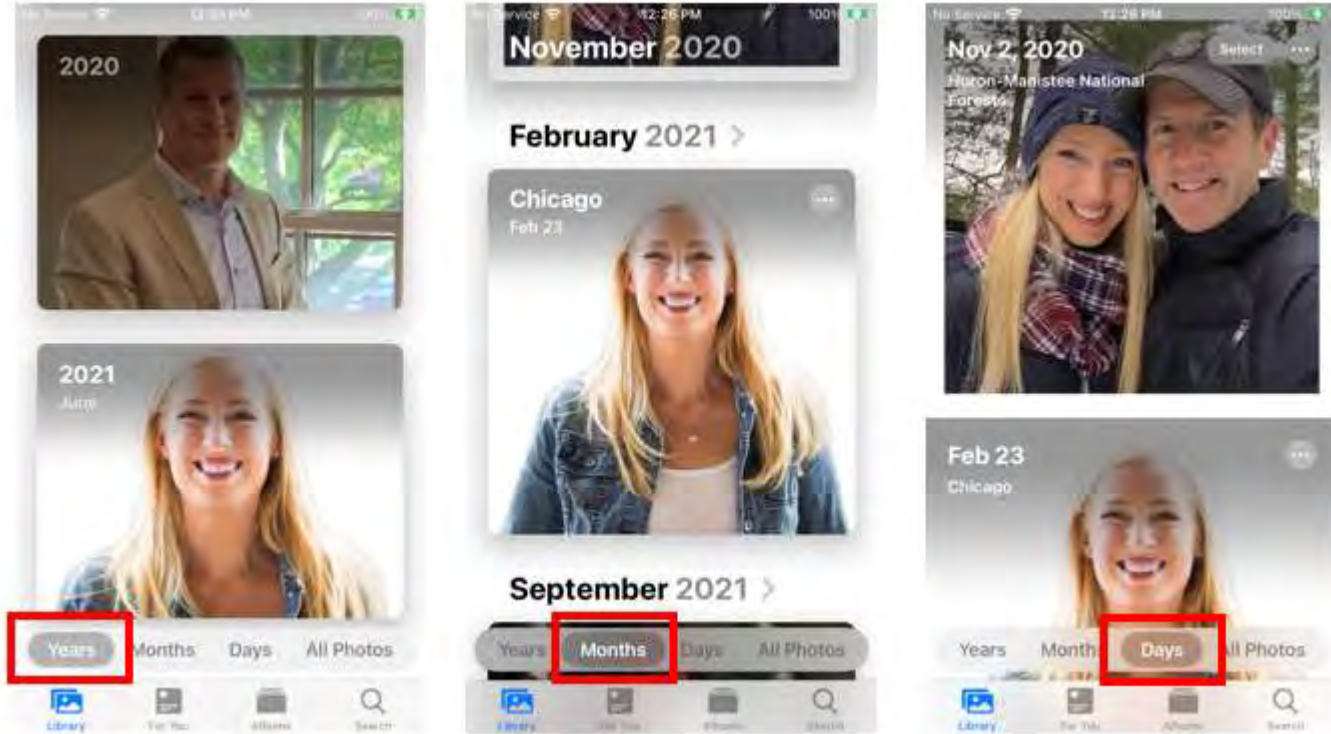
the third location, and the fourth indication is associated with a fourth set of digital files and the fourth location.




The fourth indication is associated with a fourth set of digital files and the fourth location. For example, iOS displays the view below responsive to tapping the fourth indication.


	 <p>The screenshot shows the 'Places' section of an iPhone Photos app. At the top, it says 'No Service', '12:31 PM', and '100%' battery. Below the 'Places' header, there are three entries: 'Dijon &gt;' (May 18, 2013), 'Dijon &gt;' (May 23, 2013), and 'Cologne &gt;' (Jun 15, 2017). Each entry includes a small thumbnail image and a 'Show All' button. The bottom dock shows icons for Library, For You, Albums, and Search.</p>
<p><b>16.</b> The method of claim 15, wherein the third set of digital files and the fourth set of digital files are associated with the second person.</p>	<p>The third set of digital files and the fourth set of digital files are associated with the second person. As shown below, each of the digital files includes a photograph of the second person.</p>


	
<p><b>17.</b> The method of claim 1, further comprising causing the interface to display an interactive timeline view, the interactive timeline view</p>	<p>iOS causes the interface to display an interactive timeline view, the interactive timeline view permitting a user to group a plurality of digital files by year, month, and day.</p>

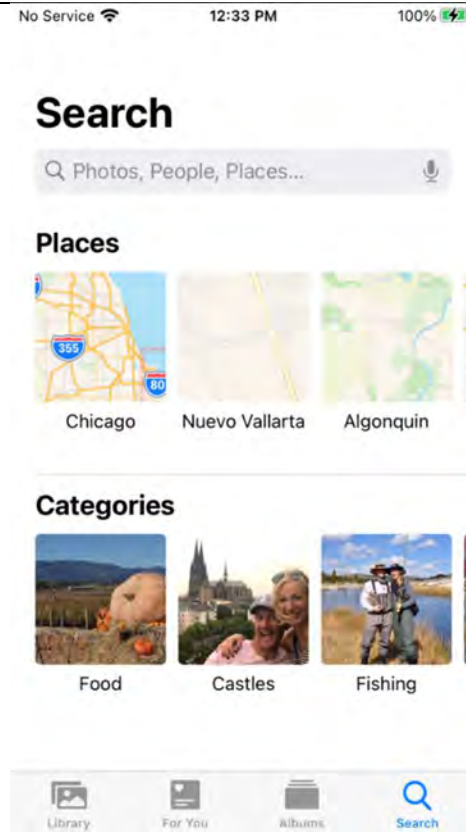
<p>permitting a user to group a plurality of digital files by year, month, and day.</p>	 <p>The image displays three screenshots of the iOS Photos app interface. The first screenshot shows a gallery for the year 2020 with a photo of a man in a tan jacket, and a gallery for the year 2021 with a photo of a woman with blonde hair. The 'Years' button at the bottom is highlighted with a red box. The second screenshot shows a gallery for November 2020 with a photo of a woman, and a gallery for February 2021 with a photo of a woman in a denim jacket. The 'Months' button at the bottom is highlighted with a red box. The third screenshot shows a gallery for Nov 2, 2020 with a photo of a man and woman, and a gallery for Feb 23, Chicago with a photo of a woman. The 'Days' button at the bottom is highlighted with a red box.</p>
<p><b>18[pre]</b> The method of claim 17, further comprising:</p>	<p>See information for claim 17.</p>
<p><b>18[a]</b> responsive to receiving a year input, grouping the plurality of digital files based on year</p>	<p>Responsive to receiving a year input (e.g., tapping the “Years” element), iOS groups the plurality of digital files based on year and causes at least one of the plurality of digital files to be displayed on the interface.</p>



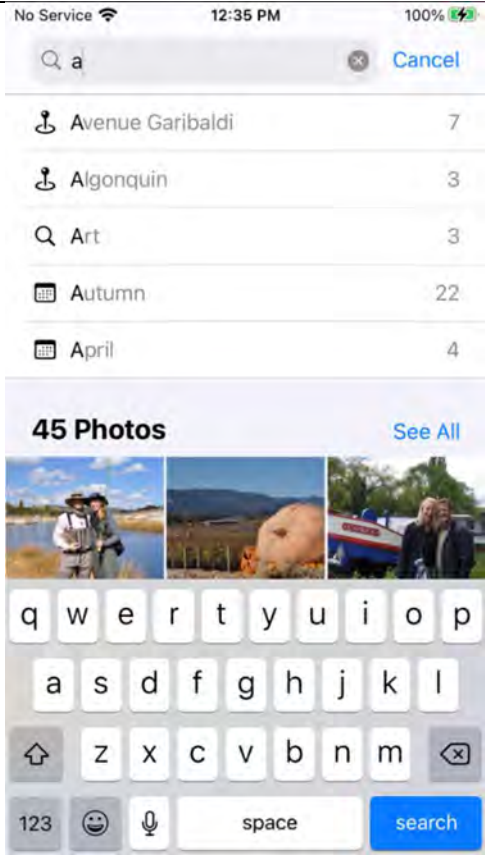
<p>and causing at least one of the plurality of digital files to be displayed on the interface;</p>	 <p>The screenshot shows the Photos app interface on an iPhone. At the top, there's a status bar with 'No Service', '12:28 PM', and '100%' battery. Below that, two photo galleries are visible. The first gallery is for the year '2020' and features a photo of a man in a light-colored jacket. The second gallery is for the year '2021' and features a photo of a smiling woman with long blonde hair. At the bottom of the screen, there are four filter buttons: 'Years', 'Months', 'Days', and 'All Photos'. The 'Years' button is highlighted with a red rectangular box. Below the filters is a dock with four icons: 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>18[b]</b> responsive to receiving a month input, grouping the plurality of digital files based on month and causing at least one of the plurality of digital files to be displayed on the interface; and</p>	<p>Responsive to receiving a month input (e.g., tapping the “Months” element), iOS groups the plurality of digital files based on month and causes at least one of the plurality of digital files to be displayed on the interface.</p>


	
<p><b>18[c]</b> responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital files to be displayed on the interface.</p>	<p>Responsive to receiving a day input (e.g., tapping the “Days” element), iOS groups the plurality of digital files based on day and causes at least one of the plurality of digital files to be displayed on the interface.</p>

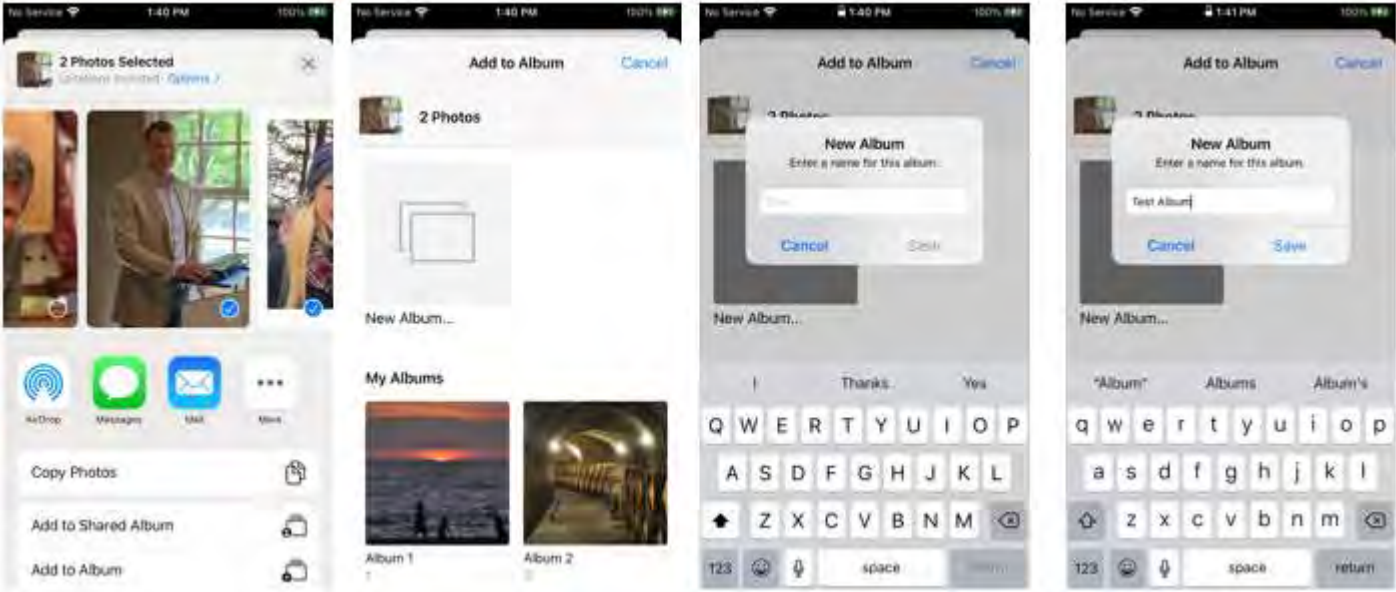
	
<p><b>19.</b> The method of claim 1, further comprising receiving one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria.</p>	<p>iOS receives one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, iOS provides filtering criteria based on places (e.g., Chicago) and categories (e.g., food, castles, fishing, birds, animals, etc.).</p>



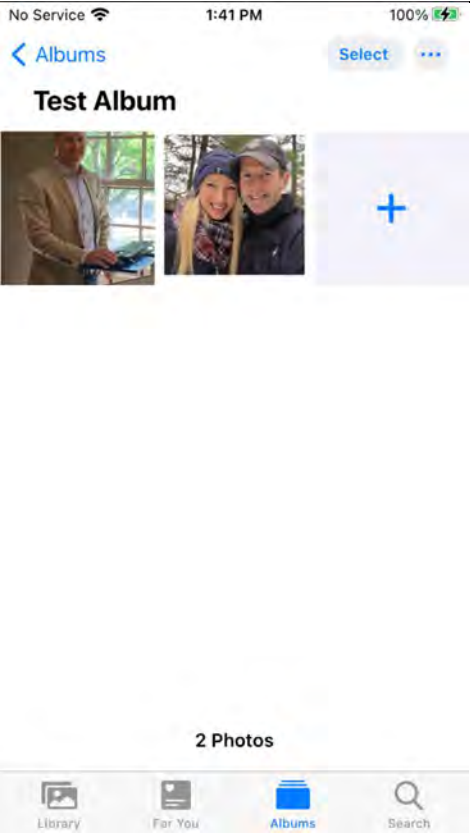
Further, iOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing the letter “a” as a filtering criterion causes digital files to be displayed based on locations or months starting with the letter “a.”

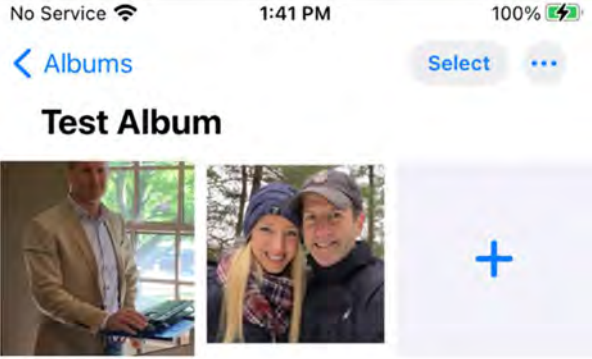
	 <p>The screenshot shows an iOS search interface. At the top, the status bar displays 'No Service', '12:35 PM', and '100%' battery. Below the status bar is a search bar containing the letter 'a' and a 'Cancel' button. The search results are listed as follows:</p> <ul style="list-style-type: none"> <li>Avenue Garibaldi 7</li> <li>Algonquin 3</li> <li>Art 3</li> <li>Autumn 22</li> <li>April 4</li> </ul> <p>Below the search results is a section titled '45 Photos' with a 'See All' link. Three photo thumbnails are visible: a person in a hat, a landscape with a large rock, and a person in a boat. At the bottom of the screenshot is a QWERTY keyboard with a blue 'search' button.</p> <p>The filtering criteria discussed above are exemplary: iOS may receive many different filtering criteria (and in fact will automatically create or suggest filter criteria).</p>
<p><b>20[pre]</b> The method of claim 19, further comprising:</p>	<p><i>See information for claim 19.</i></p>

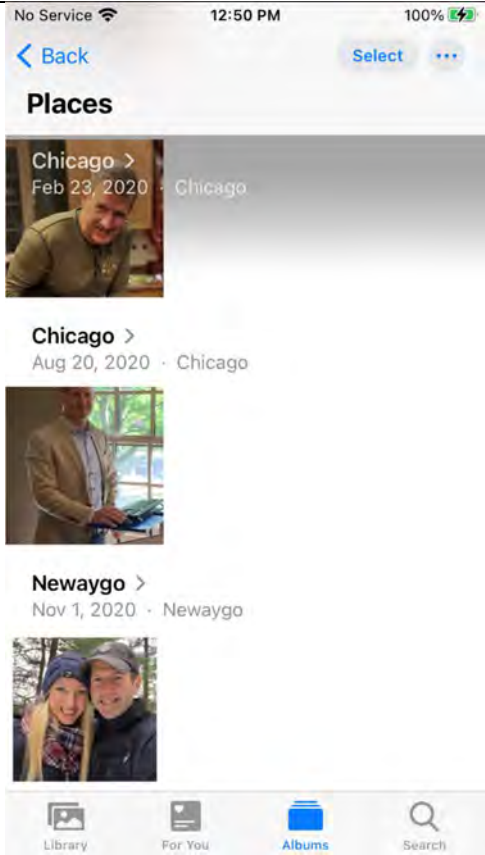
<p><b>20[a]</b> causing a plurality of images to be displayed on the interface;</p>	<p>iOS causes a plurality of images to be displayed on the interface.</p>  <p>The screenshot shows an iOS photo gallery interface. At the top, it displays the date 'Feb 23, 2020' and the location 'Chicago - Lincoln Park'. Below this is a grid of 12 photos. A red rectangular box highlights a selection of three photos in the middle row: a man in a brown jacket, a man in a blue jacket, and a couple. At the bottom of the grid, there are tabs for 'Years', 'Months', 'Days', and 'All Photos'. The bottom of the screen shows the iOS home indicator bar with icons for Library, For You, Albums, and Search.</p>
<p><b>20[b]</b> receiving alphanumeric text as the album name;</p>	<p>iOS receives alphanumeric text as the album name. For example, iOS displays an “Add to Album” option responsive to a selection of the plurality of images. iOS then displays a “New Album” option and a prompt to enter alphanumeric text as the album name.</p>

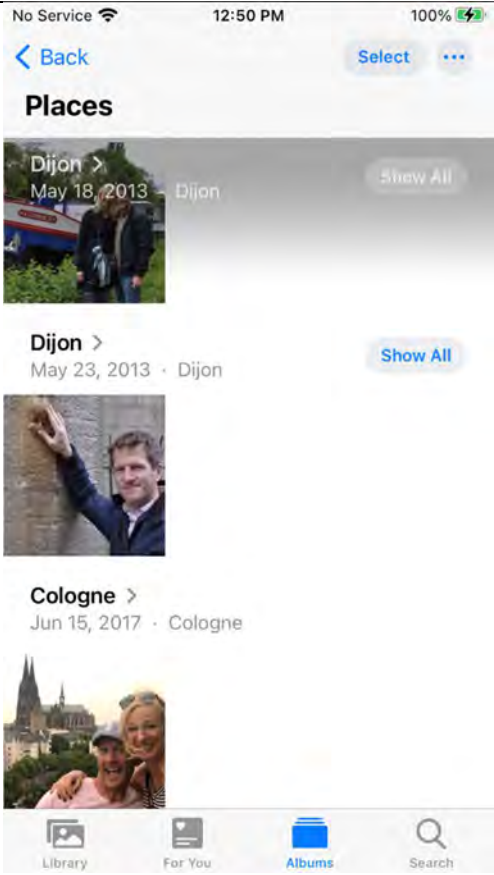
	 <p>The image consists of four sequential screenshots of an iPhone Photos app interface. The first screenshot shows two photos selected, with a '2 Photos Selected' header and a '2 Photos' sub-header. Below the photos are sharing options: AirDrop, Messages, Mail, and More. The second screenshot shows the 'Add to Album' dialog box with a '2 Photos' header and a 'New Album...' button. The third screenshot shows the 'New Album' dialog box with a text input field and 'Cancel' and 'Save' buttons. The fourth screenshot shows the 'New Album' dialog box with the text 'Test Album' entered in the input field and a keyboard visible below.</p>
<p>20[c] causing each of the plurality of images to be associated with an album name; and</p>	<p>iOS causes each of the plurality of images to be associated with an album name. For example, as shown below, each of the plurality of images are displayed with the album name.</p>



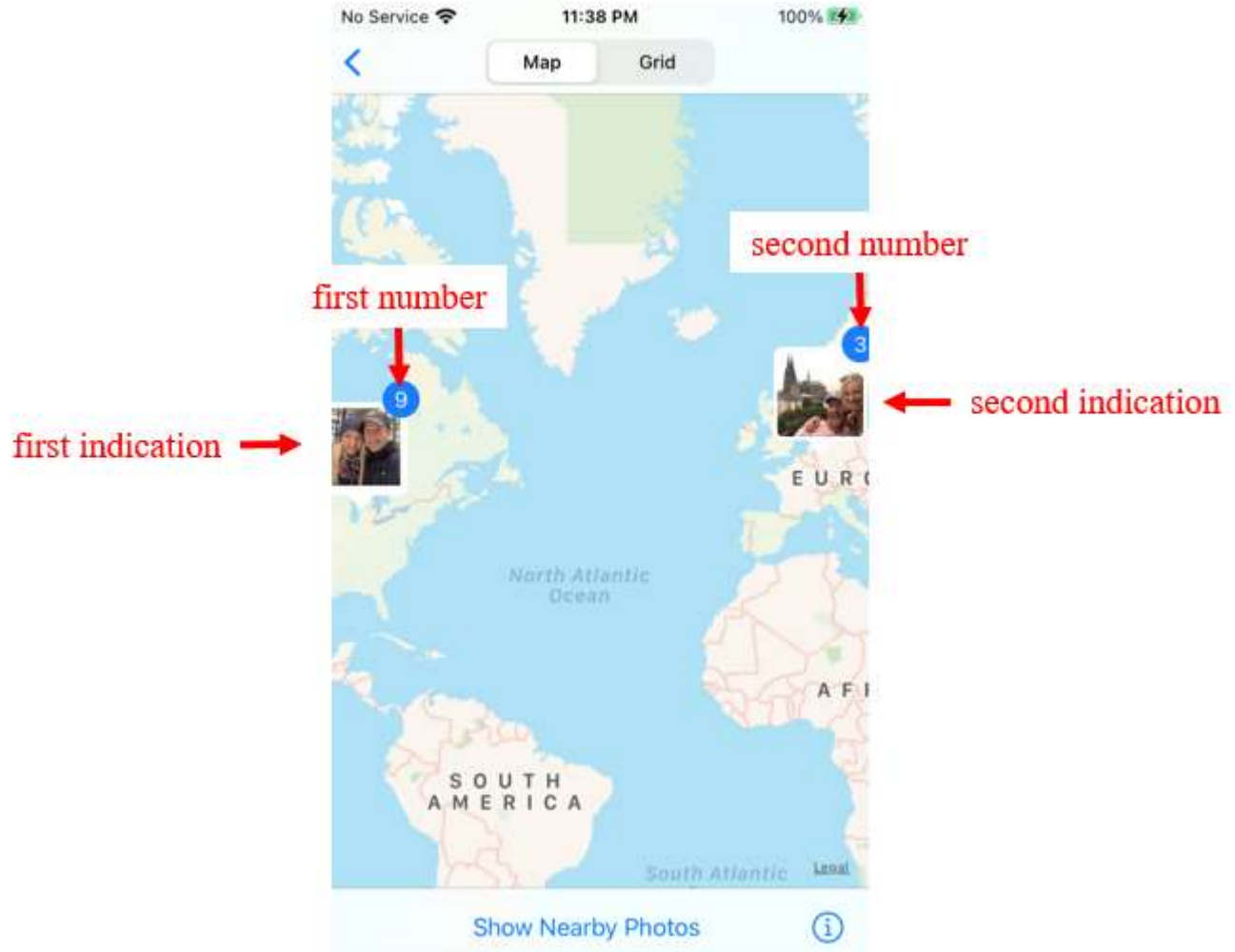
	
<p><b>20[d]</b> causing an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>	<p>iOS causes an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>

	
<p><b>21[pre]</b> The method of claim 2, further comprising</p>	<p><i>See information for claim 2.</i></p>
<p><b>21[a]</b> responsive to a selection associated with the first location, causing the first set of digital files to be displayed on the interface and</p>	<p>Responsive to a selection associated with the first location (e.g., responsive to a touch/tap of the first indication in the first location view) iOS causes the first set of digital files to be displayed on the interface.</p>

	
<p><b>21[b]</b> responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.</p>	<p>Responsive to a selection associated with the second location (e.g., responsive to a touch/tap of the second indication in the first location view) iOS causes the first set of digital files to be displayed on the interface.</p>

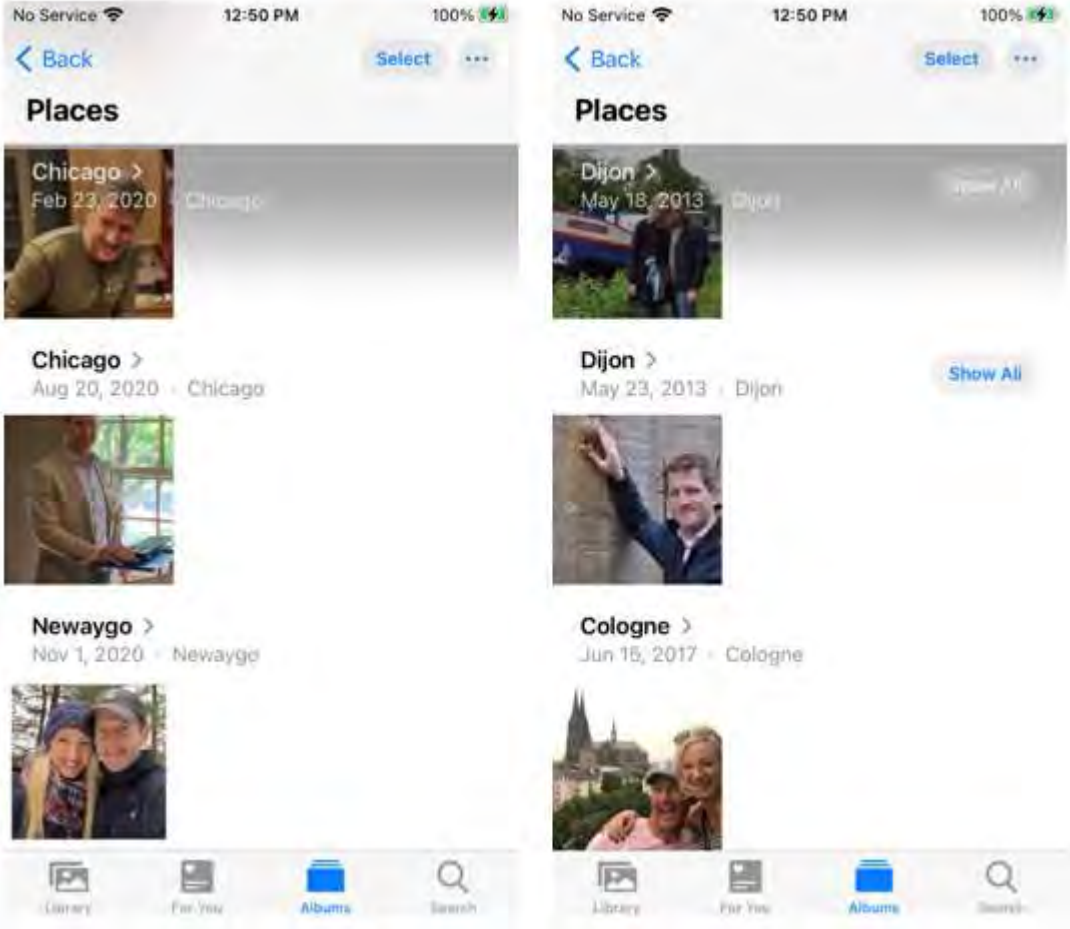
	
<p><b>22.</b> The method of claim 21, further comprising causing (i) a first number associated with a number of digital files in the first set of digital</p>	<p>The first location view displayed by iOS includes (i) a first number associated with a number of digital files in the first set of digital files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files on the interface.</p>


files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.



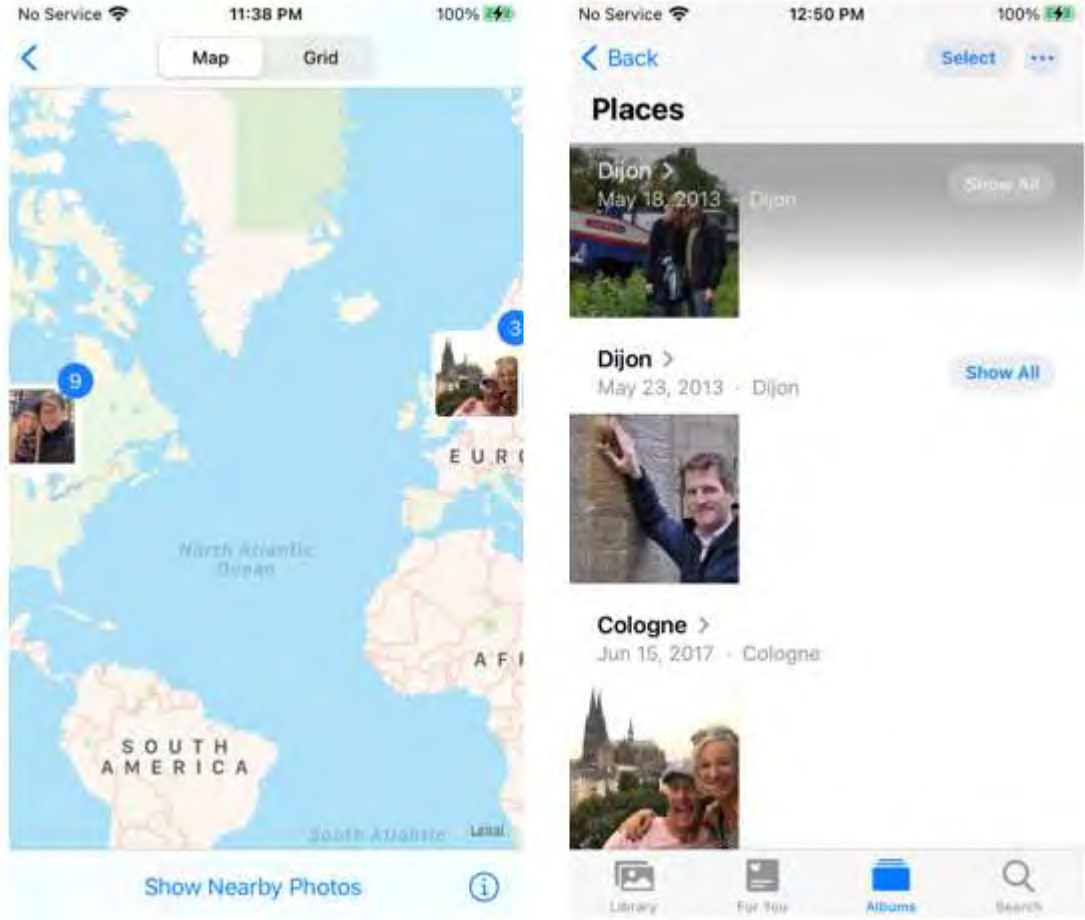
**23.** The method of claim 3, wherein each of the first

Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

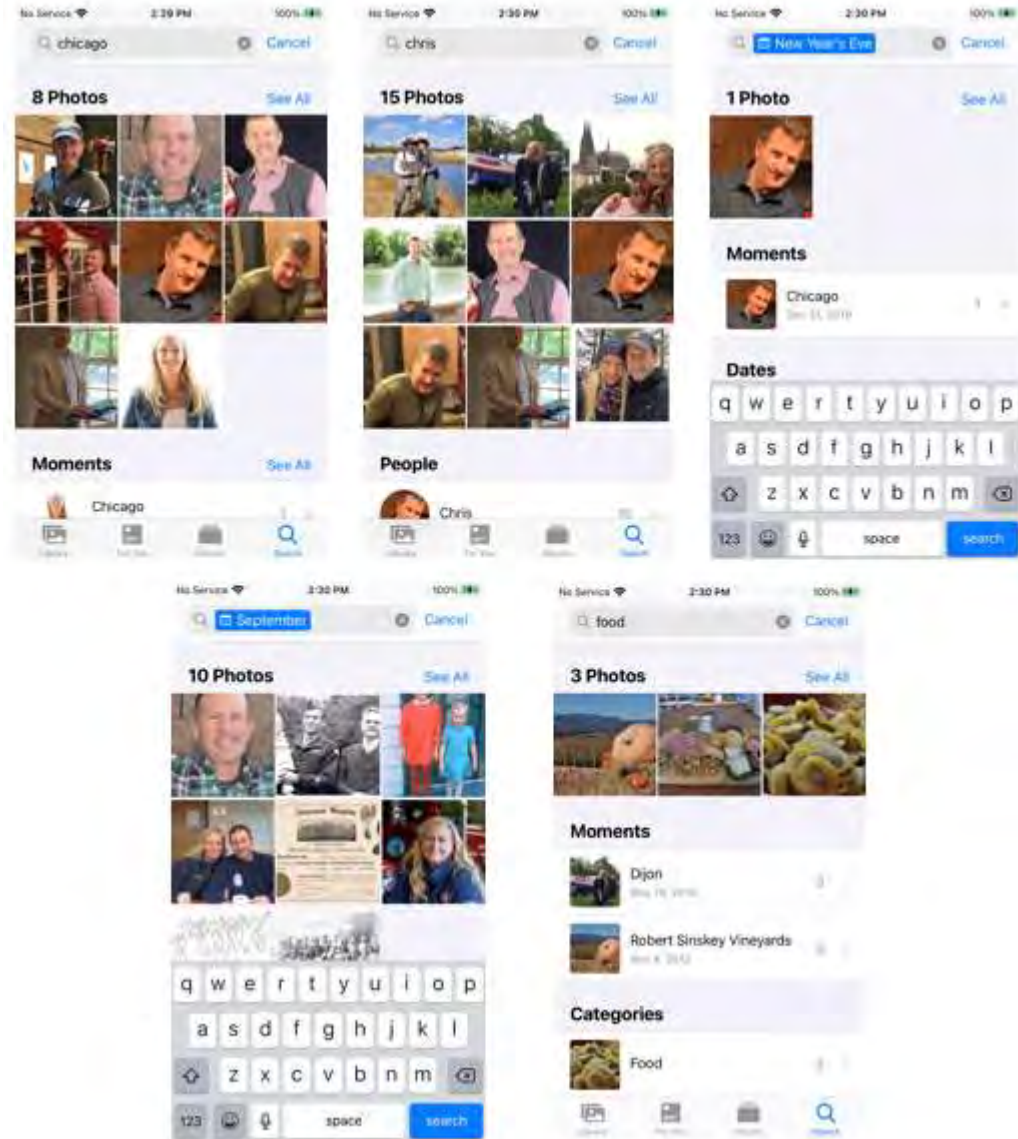
<p>digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.</p>	
<p><b>25[pre]</b> The method of claim 21,</p>	<p><i>See</i> information for claim 21.</p>
<p><b>25[a]</b> wherein at least one digital file in the first set</p>	<p>At least one digital file in the first set of digital files displayed on the interface responsive to the selection associated with the first location is not overlaid on the interactive geographic map.</p>

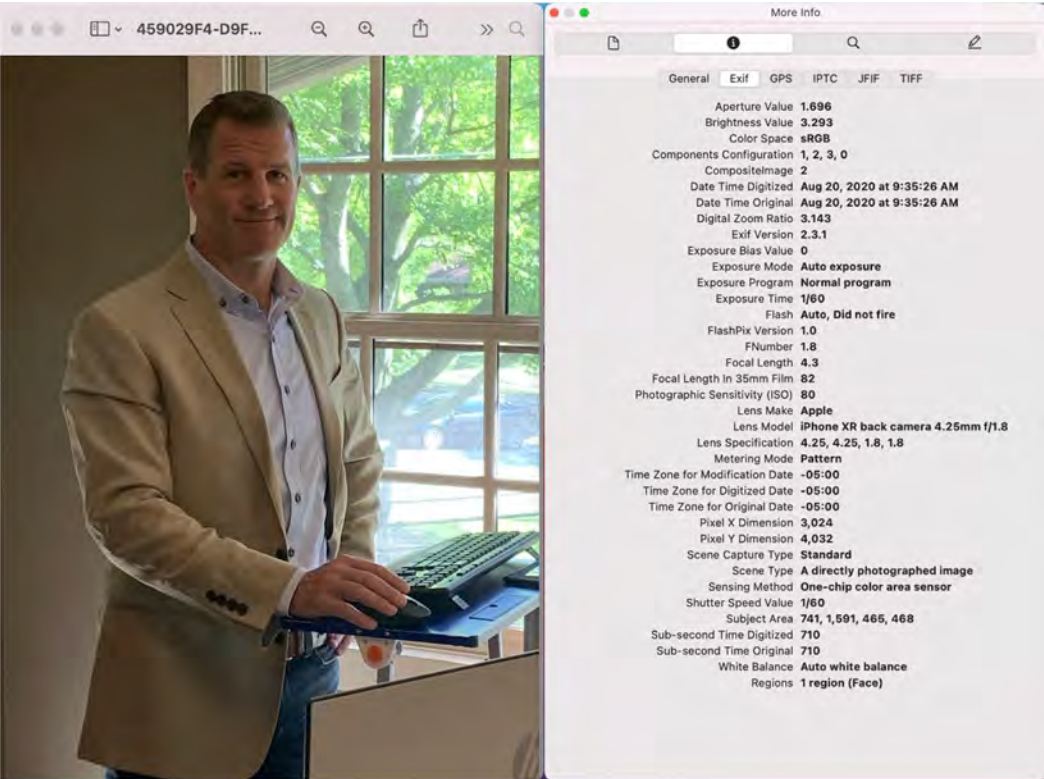
<p>of digital files displayed on the interface responsive to the selection associated with the first location is not overlaid on the interactive geographic map and</p>	
<p><b>25[b]</b> at least one digital file in the second set of digital files displayed on the interface responsive to the selection</p>	<p>At least one digital file in the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>



<p>associated with the second location are not overlaid on the interactive geographic map.</p>	
<p><b>26.</b> The method of claim 19, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>


person, an event, a date, or any combination thereof.



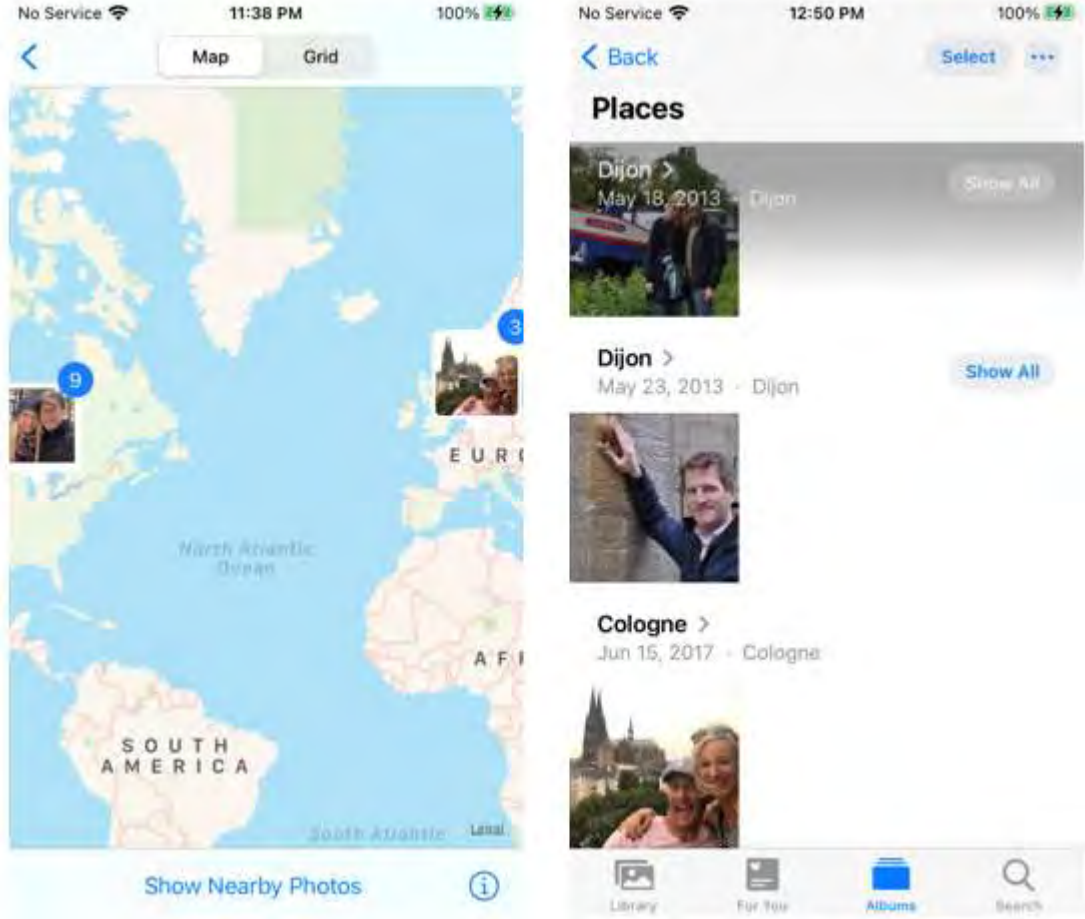
<p><b>27.</b> The method of claim 10, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file.</p>	<p>Exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file. For example, iOS can export the first digital file to macOS via AirDrop, and EXIF data associated with the first digital file is viewable in macOS.</p>  <p>The image shows a macOS photo viewer window with a photograph of a man in a light-colored suit jacket standing in front of a window. To the right of the photo is a 'More info' sidebar with tabs for General, Exif, GPS, IPTC, JFIF, and TIFF. The 'Exif' tab is selected, displaying the following data:</p> <ul style="list-style-type: none"> <li>Aperture Value: 1.696</li> <li>Brightness Value: 3.293</li> <li>Color Space: sRGB</li> <li>Components Configuration: 1, 2, 3, 0</li> <li>CompositelImage: 2</li> <li>Date Time Digitized: Aug 20, 2020 at 9:35:26 AM</li> <li>Date Time Original: Aug 20, 2020 at 9:35:26 AM</li> <li>Digital Zoom Ratio: 3.143</li> <li>Exif Version: 2.3.1</li> <li>Exposure Bias Value: 0</li> <li>Exposure Mode: Auto exposure</li> <li>Exposure Program: Normal program</li> <li>Exposure Time: 1/60</li> <li>Flash: Auto, Did not fire</li> <li>FlashPix Version: 1.0</li> <li>FNumber: 1.8</li> <li>Focal Length: 4.3</li> <li>Focal Length in 35mm Film: 82</li> <li>Photographic Sensitivity (ISO): 80</li> <li>Lens Make: Apple</li> <li>Lens Model: iPhone XR back camera 4.25mm f/1.8</li> <li>Lens Specification: 4.25, 4.25, 1.8, 1.8</li> <li>Metering Mode: Pattern</li> <li>Time Zone for Modification Date: -05:00</li> <li>Time Zone for Digitized Date: -05:00</li> <li>Time Zone for Original Date: -05:00</li> <li>Pixel X Dimension: 3,024</li> <li>Pixel Y Dimension: 4,032</li> <li>Scene Capture Type: Standard</li> <li>Scene Type: A directly photographed image</li> <li>Sensing Method: One-chip color area sensor</li> <li>Shutter Speed Value: 1/60</li> <li>Subject Area: 741, 1,591, 465, 468</li> <li>Sub-second Time Digitized: 710</li> <li>Sub-second Time Original: 710</li> <li>White Balance: Auto white balance</li> <li>Regions: 1 region (Face)</li> </ul>
<p><b>28.</b> The method of claim 1, wherein the input that is indicative of the selection of the</p>	<p>The input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image associated with the first person. <i>See</i> information for limitation 1[b].</p>

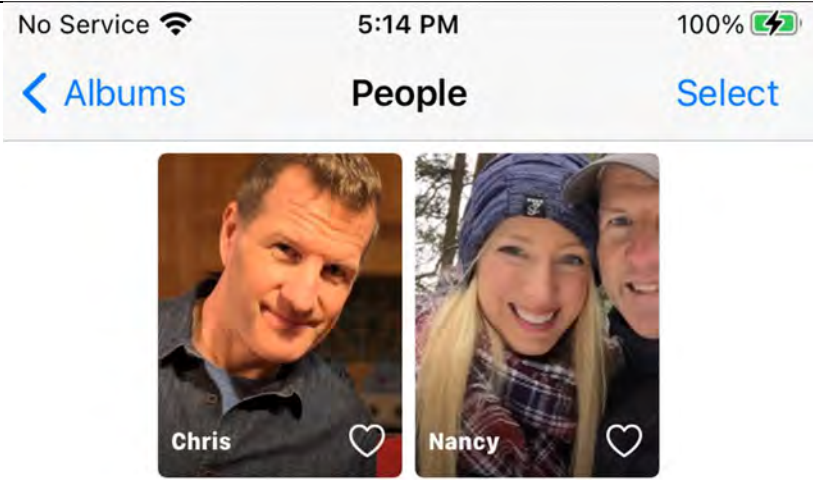
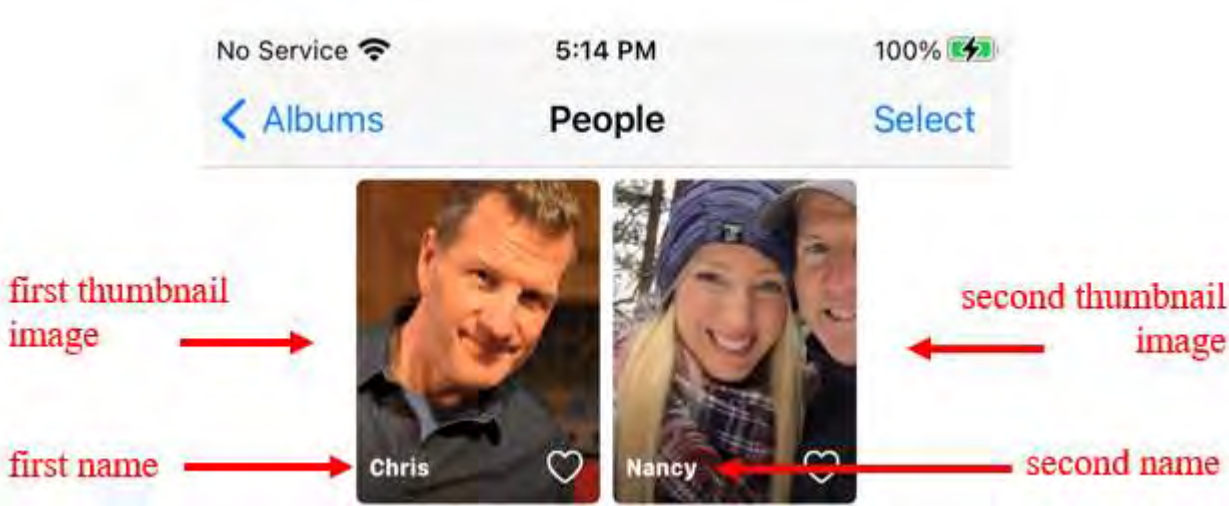
Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

<p>first person includes a touch or click of the first thumbnail image associated with the first person.</p>	
<p><b>29.</b> The method of claim 1, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.</p>	<p>The input that is indicative of the selection of the first map image is a touch or click of the first map image. <i>See</i> information for limitation 1[c].</p>
<p><b>30[pre]</b> The method of claim 25, wherein</p>	<p><i>See</i> information for claim 25.</p>
<p><b>30[a]</b> each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map and</p>	<p>Each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map.</p>

	 <p>The image contains two screenshots from an iPhone Photos app. The left screenshot shows a world map with a 'Show Nearby Photos' button at the bottom. The right screenshot shows a 'Places' list with photo thumbnails for 'Chicago' and 'Newaygo'.</p>
<p><b>30[b]</b> each of the digital files in the second set of digital files displayed on the interface responsive to the selection</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>



<p>associated with the second location are not overlaid on the interactive geographic map.</p>	
<p><b>31[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, iOS performs a method, as set forth below.</p>
<p><b>31[a]</b> causing an interface to display a people view, the</p>	<p>iOS causes an interface (e.g., Apple iPhone) to display a people view.</p>

<p>people view including:</p>	
<p><b>31[a][i]</b> a first thumbnail image associated with a first person, <b>31[a][ii]</b> a first name associated with the first person, <b>31[a][iii]</b> a second thumbnail image associated with a second person, and <b>31[a][iv]</b> a second name associated with the second person;</p>	<p>The people view includes (1) a first thumbnail image associated with a first person, (2) a first name associated with the first person, (3) a second thumbnail image associated with a second person, and (4) a second name associated with the second person.</p> 



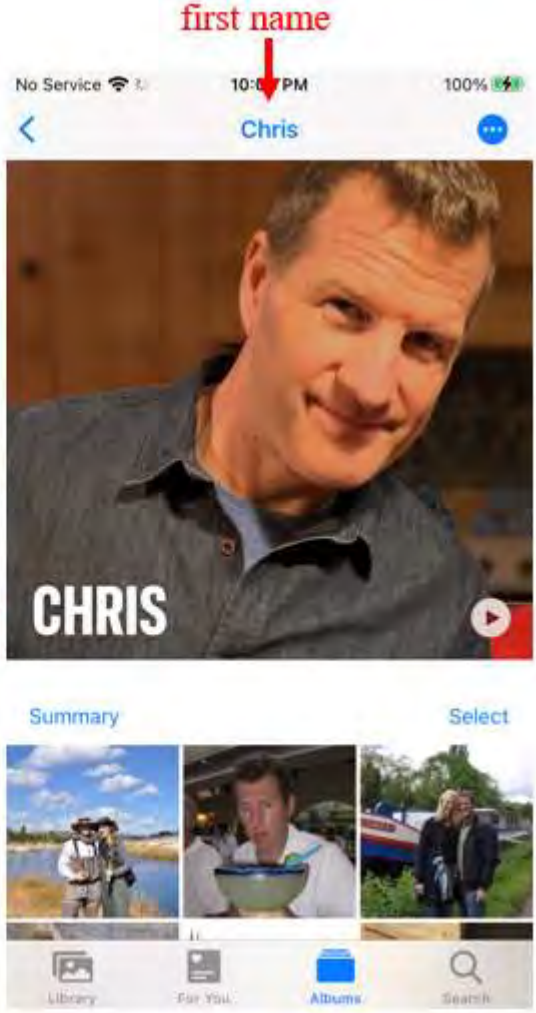
**31[b]** responsive to an input that is indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:

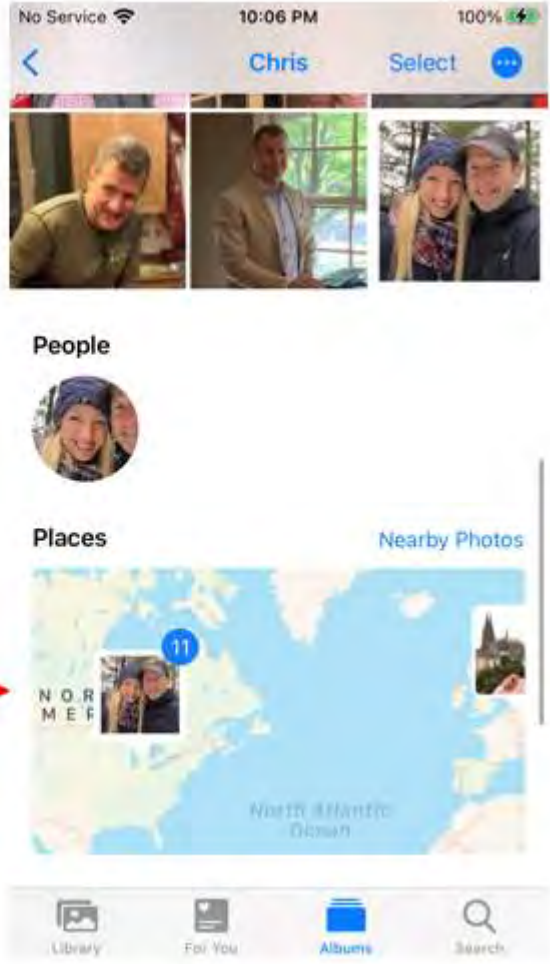
Responsive to an input that is indicative of a selection associated with the first person (e.g., tapping the first thumbnail image in the people view), iOS causes a first person view to be displayed on the interface.



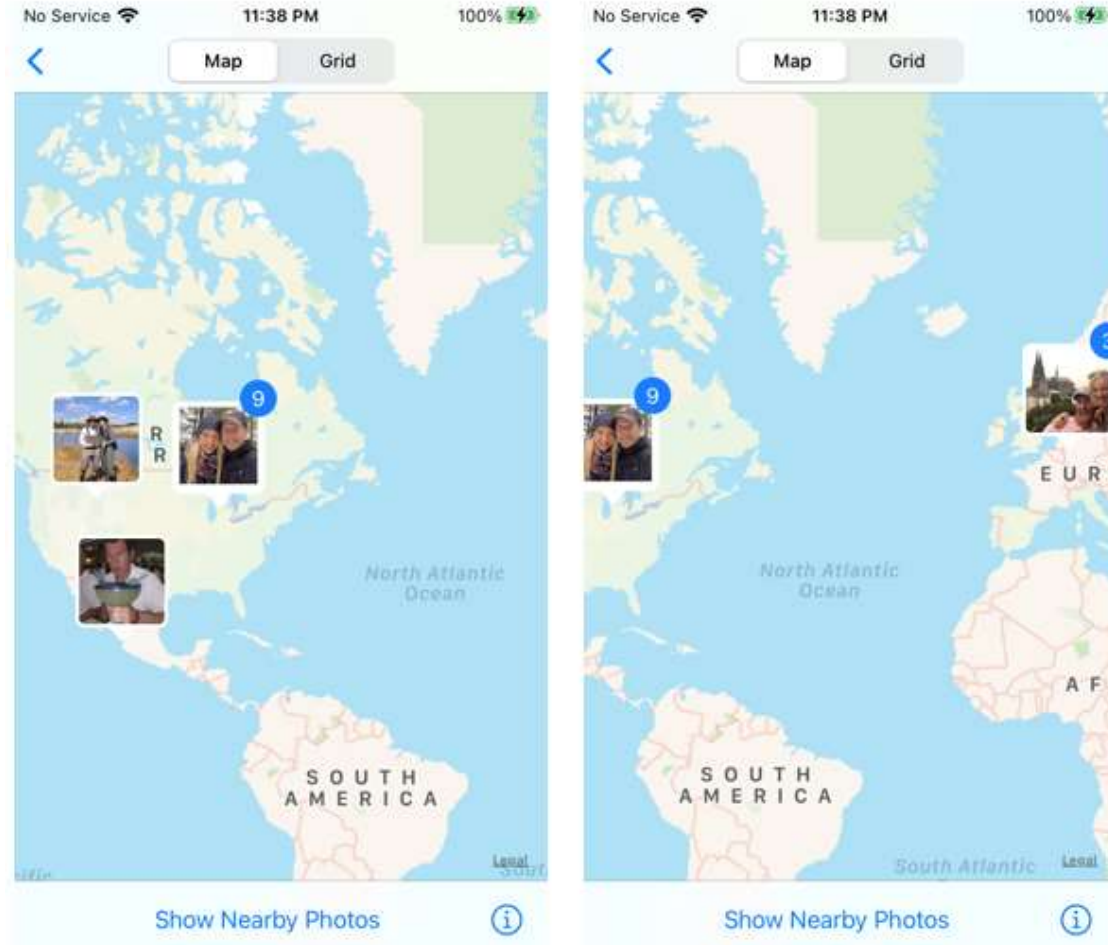
**31[b][i]** a first digital file associated with the first person, **31[b][ii]** the first name associated with the first person, and

The first person view includes a first digital file associated with the first person and the first name associated with the first person.

	 <p>The screenshot shows an iPhone contact card for a person named Chris. At the top, the status bar displays "No Service", "10:07 PM", and "100%". The contact name "Chris" is at the top right. Below the name is a large portrait photo of a man with the name "CHRIS" overlaid in white text at the bottom left. Below the photo is a "Summary" section with three small thumbnail images. At the bottom of the screen is the iOS home indicator bar with icons for Library, For You, Albums, and Search. Red annotations with arrows point to the name "Chris" at the top, the name "CHRIS" on the photo, and the first thumbnail image in the summary section.</p>
<p><b>31[b][iii]</b> a first map image;</p>	<p>The first person view also includes a first map image.</p>

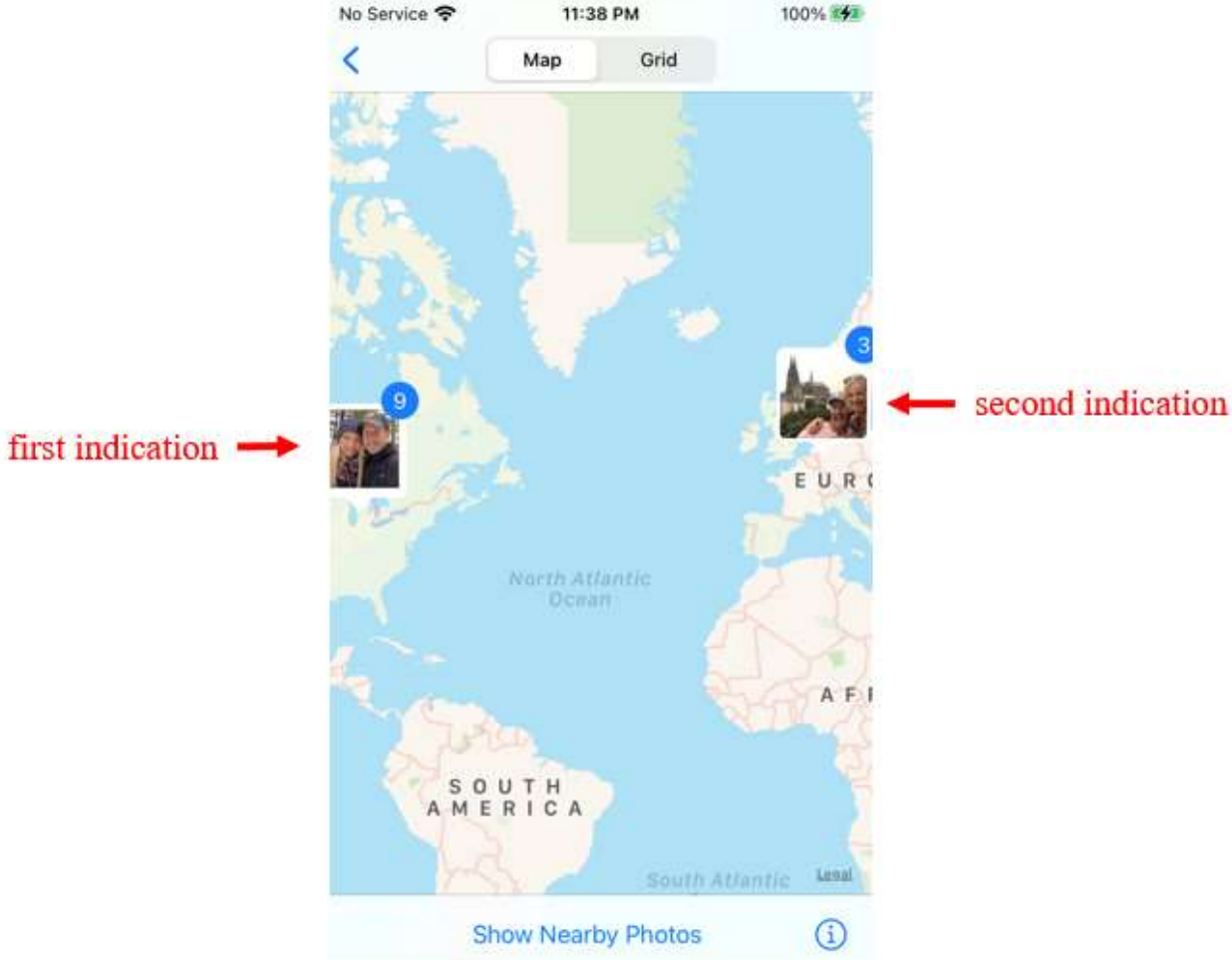
	 <p>The screenshot shows an iPhone photo gallery interface. At the top, the status bar displays 'No Service', '10:06 PM', and '100%' battery. Below the status bar, there is a navigation bar with a back arrow, the name 'Chris', and a 'Select' button. The main area shows a grid of photos. Under the heading 'People', there is a circular profile picture. Below that, under the heading 'Places', there is a map of North America with a blue pin and a photo thumbnail. A red arrow points to this thumbnail with the text 'first map image'. At the bottom, there is a navigation bar with icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>31[c]</b> responsive to an input that is indicative of a selection of the first map image in the first person view</p>	<p>Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), iOS causes a first location view to be displayed on the interface. The first location view includes an interactive geographic map. The geographic is interactive in that iOS can zoom in or out, or move side to side.</p>

view, causing a first location view to be displayed on the interface, the first location view including:



**31[c][i]** an interactive geographic map, **31[c][ii]** a first indication positioned at a

The first location view includes a first indication positioned at a first location on the interactive geographic map and a second indication positioned at a second location on the interactive geographic map.

<p>first location on the interactive geographic map, and <b>31[c][iii]</b> a second indication positioned at a second location on the interactive geographic map;</p>	
<p><b>31[d]</b> responsive to receiving a year input, grouping a plurality of digital files based on year</p>	<p>Responsive to receiving a year input (e.g., tapping the “Years” element), iOS groups the plurality of digital files based on year and causes at least one of the plurality of digital files to be displayed on the interface.</p>



and causing at least one of the plurality of digital files to be displayed on the interface;



**31[e]** responsive to receiving a month input, grouping the plurality of digital files based on month and causing at least one of the plurality of digital files to be

Responsive to receiving a month input (e.g., tapping the “Months” element), iOS groups the plurality of digital files based on month and causes at least one of the plurality of digital files to be displayed on the interface.


displayed on the interface; and



**31[f]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital files to be

Responsive to receiving a day input (e.g., tapping the “Days” element), iOS groups the plurality of digital files based on day and causes at least one of the plurality of digital files to be displayed on the interface.



<p>displayed on the interface.</p>	
<p><b>32.</b> The method of claim 31, wherein the first digital file is included in the plurality of digital files.</p>	<p>The first digital file (<i>see</i> limitation 31[b][i]) is included in the plurality of digital files that are grouped by year, month, or day.</p>

<p><b>33.</b> The method of claim 31, further comprising causing the interface to display an interactive timeline view prior</p>	<p>iOS causes the interface to display an interactive timeline view prior to receiving the year input, prior to receiving the month input, and prior to receiving the day input, the interactive timeline view permitting a user to provide the year input, the month input, the day input, or any combination thereof to group the plurality of digital files.</p>

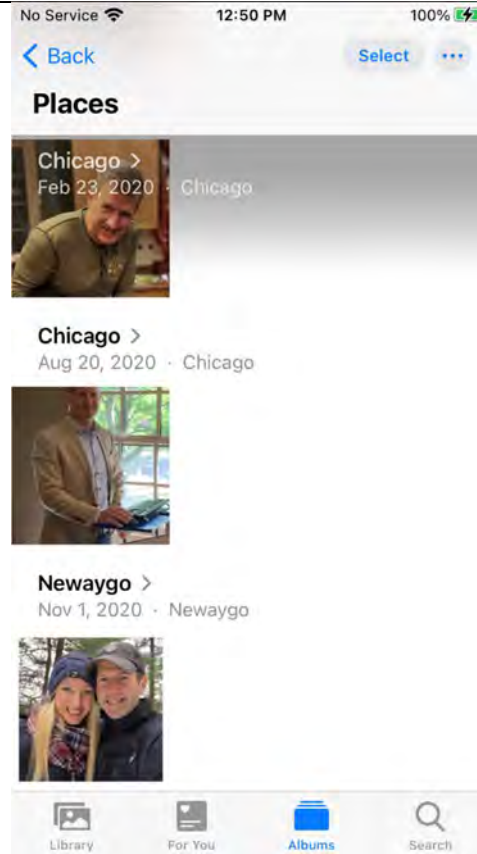
to receiving the year input, prior to receiving the month input, and prior to receiving the day input, the interactive timeline view permitting a user to provide the year input, the month input, the day input, or any combination thereof to group the plurality of digital files.



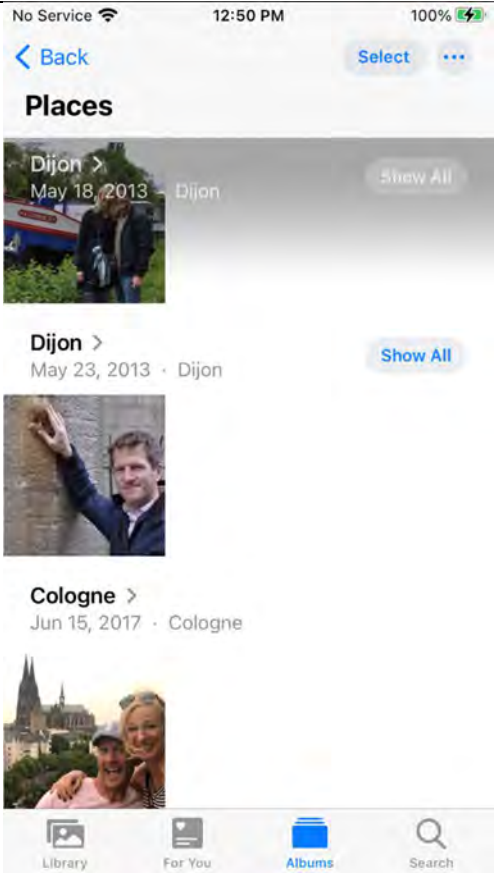
**34.** The method of claim 31, wherein the first indication is associated with a first set of digital files and the first location, and the second indication is associated with a second set of

The first indication is associated with a first set of digital files and the first location. For example, iOS causes the view below to be displayed responsive to a selection of the first indication.

digital files and the second location.

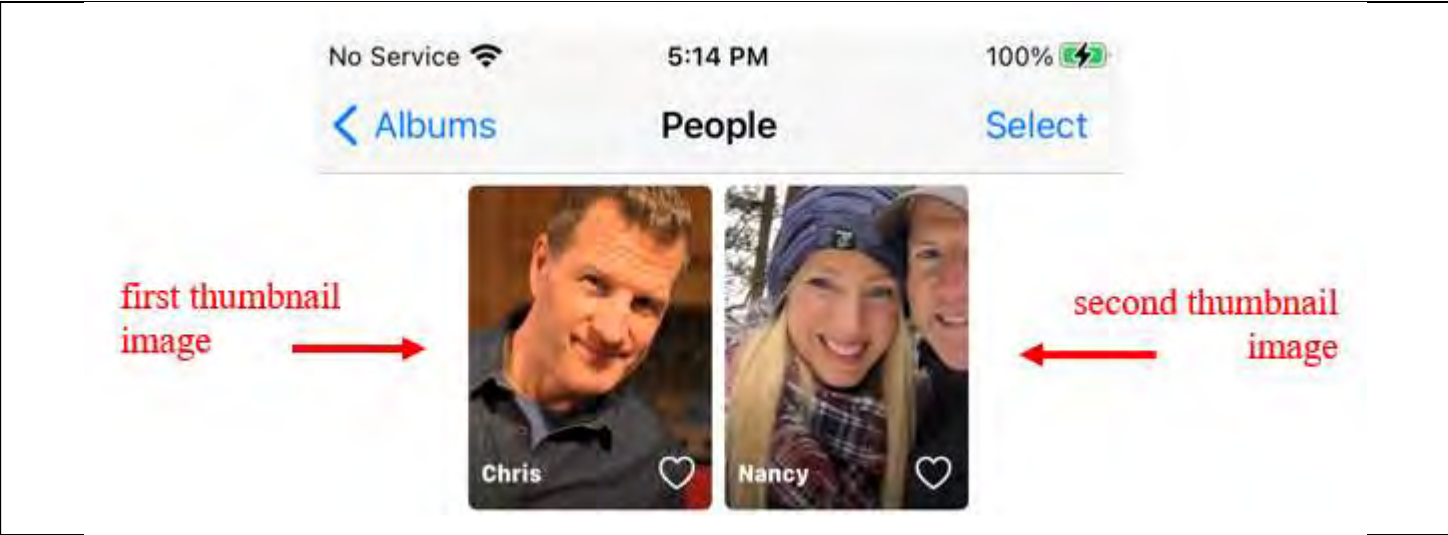


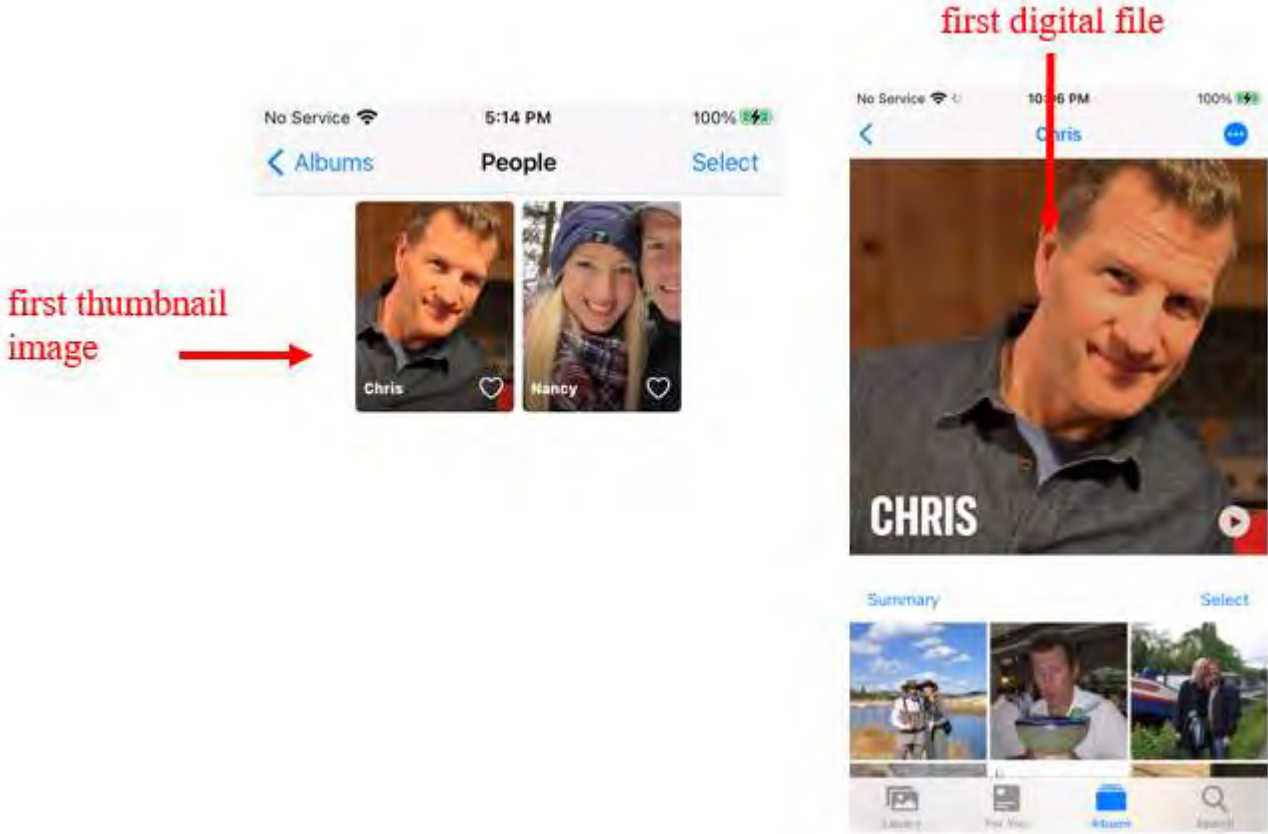
The second indication is associated with a second set of digital files and the second location. For example, iOS causes the view below to be displayed responsive to a touch/tap of the second indication.

	 <p>The screenshot shows the 'Places' section of the Photos app. At the top, it says 'No Service', '12:50 PM', and '100%' battery. Below the 'Places' header, there are three entries: 'Dijon &gt;' with a date of 'May 18, 2013' and a 'Show All' button; 'Dijon &gt;' with a date of 'May 23, 2013' and a 'Show All' button; and 'Cologne &gt;' with a date of 'Jun 15, 2017' and a 'Show All' button. The bottom dock shows icons for Library, For You, Albums, and Search.</p>
<p><b>35.</b> The method of claim 34, wherein the first set of digital files and the second set of digital files are associated with the first person.</p>	<p>The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first and second sets of digital files include photographs of the first person.</p>

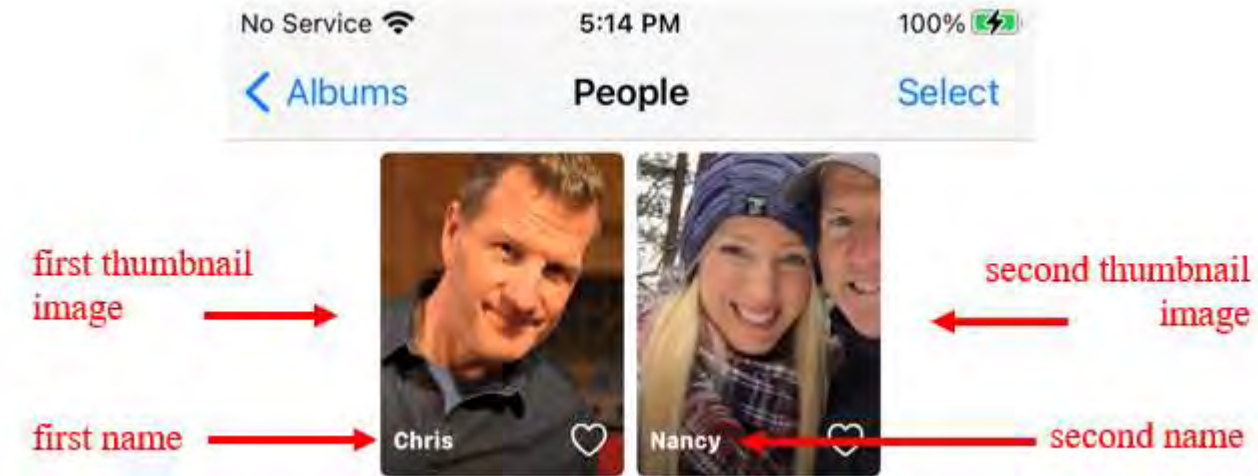
<p><b>36.</b> The method of claim 35, wherein the first thumbnail image includes at least a portion of a face of the first</p>	<p>The first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>



<p>person and the second thumbnail images includes at least a portion of a face of the second person.</p>	 <p>The screenshot shows the 'People' view on an iPhone. At the top, the status bar displays 'No Service', '5:14 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Albums', 'People', and 'Select'. Two person thumbnails are visible. The first thumbnail is labeled 'Chris' and shows a man's face. The second thumbnail is labeled 'Nancy' and shows a woman's face. Red arrows point from the text 'first thumbnail image' to the Chris thumbnail and from 'second thumbnail image' to the Nancy thumbnail.</p>
<p><b>37.</b> The method of claim 36, wherein the first thumbnail image includes at least a portion of the first digital file.</p>	<p>The first thumbnail image in the people view includes at least a portion of the first digital file in the first person view.</p>

	 <p>The image contains two screenshots from an iPhone Photos app. The left screenshot shows the 'People' view with two thumbnails labeled 'Chris' and 'Nancy'. A red arrow points from the text 'first thumbnail image' to the 'Chris' thumbnail. The right screenshot shows the full view of the 'Chris' person page, with a red arrow pointing from the text 'first digital file' to the top of the main image.</p>
<p><b>38.</b> The method of claim 36, wherein, in the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image</p>	<p>In the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image and the second name is displayed adjacent to the second thumbnail image.</p>

and the second name is displayed adjacent to the second thumbnail image.

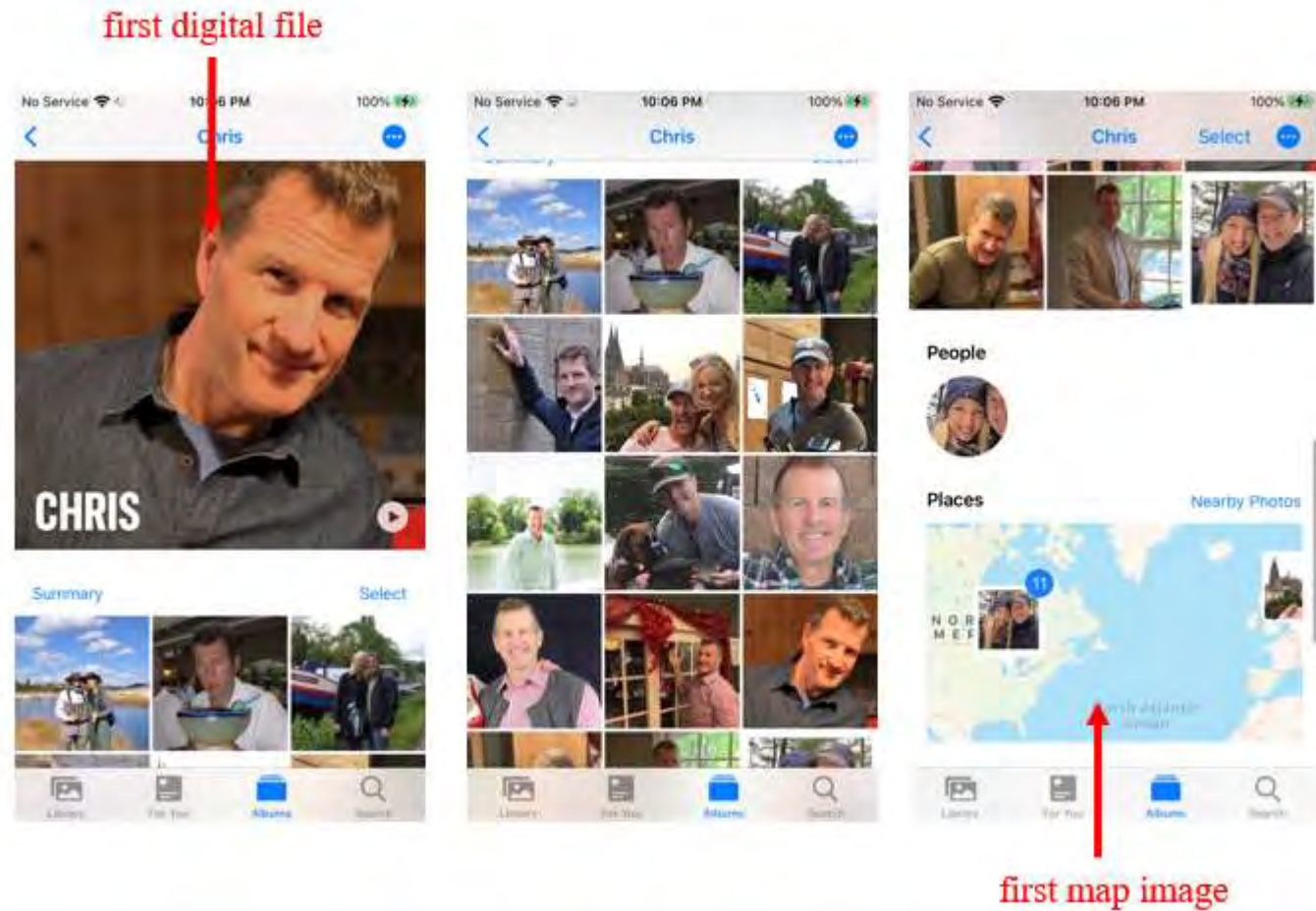


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate the name of the first person that is associated with the first thumbnail image. The way the claimed displaying performs this function is by displaying the first name in sufficient proximity to the first thumbnail image such that a user will associate the first name with the first thumbnail image. The result of the claimed displaying is that the first name is associated with the first thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name is to communicate the name of the second person that is associated with the second thumbnail image. The way the claimed displaying performs this function is by displaying the second name in sufficient proximity to the second thumbnail image such that a user will associate the second name with the second thumbnail image. The result of the claimed displaying is that the second name is associated with the second thumbnail image. iOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.


**39.** The method of claim 38, wherein, in the first person view, the first map image is positioned below the first digital file.

In the first person view, the first map image is positioned below the first digital file.



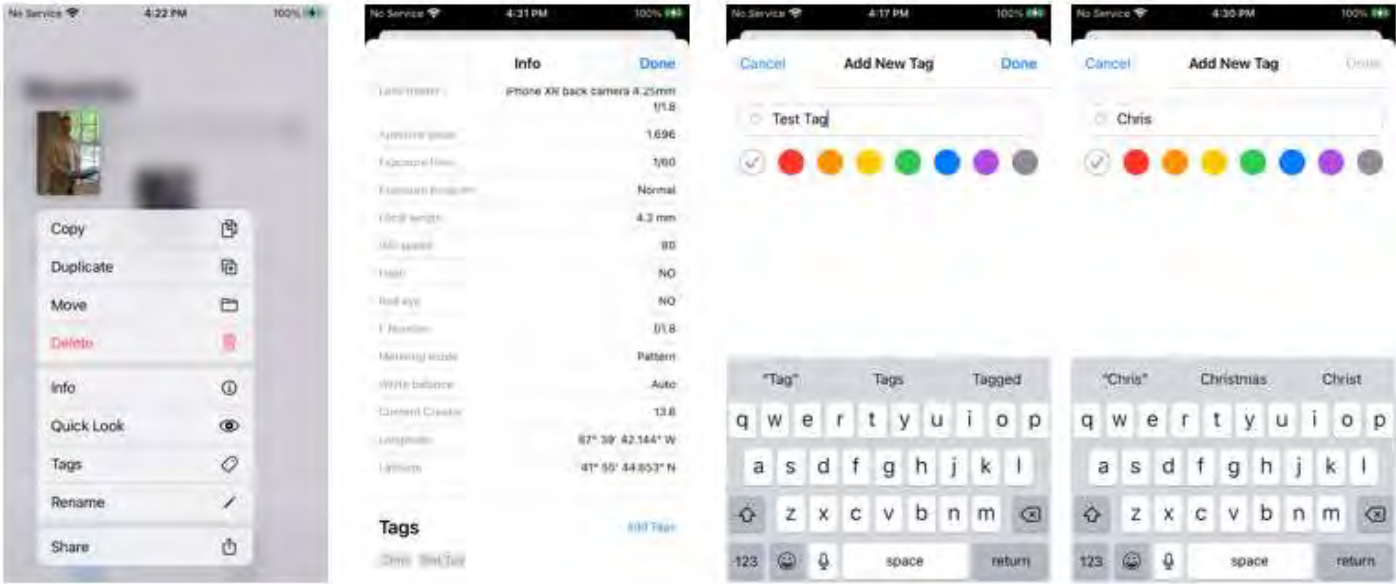
**40[pre]** The method of claim 31, further comprising,

See information for claim 1.

<p><b>40[a]</b> prior to the causing the interface to display the people view: causing the first digital file to be displayed on the interface;</p>	<p>Prior to the causing the interface to display the people view, iOS causes the first digital file to be displayed on the interface.</p> 
<p><b>40[b]</b> receiving alphanumeric text as a first user-generated tag; and</p>	<p>iOS receives alphanumeric text as a first user-generated tag. As a first example, iOS receives alphanumeric text as a first user-generated tag via the Files application.</p>

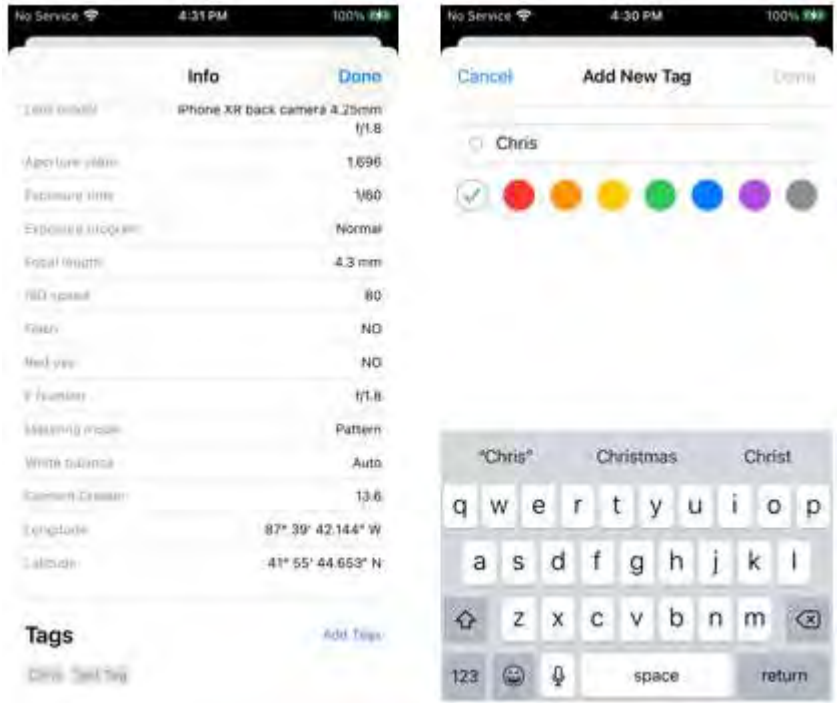


Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

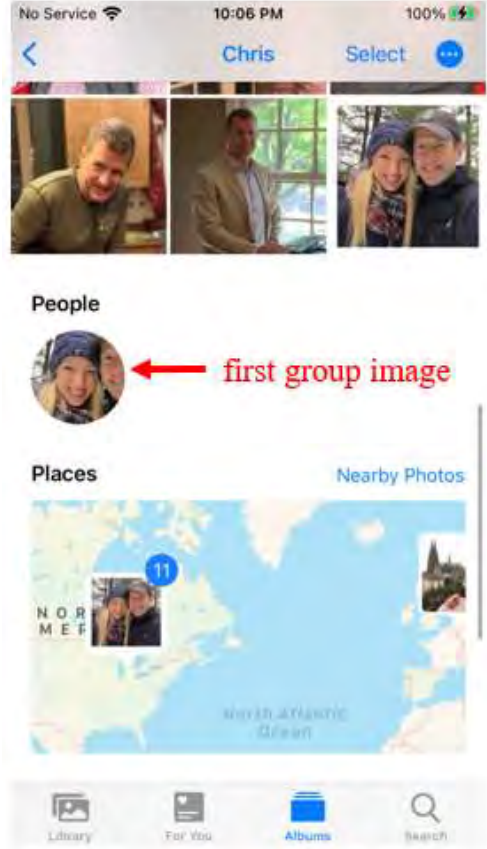
	 <p>As a second example, iOS receives alphanumeric text as a first user-generated tag via the Photos application when Photos initially recognizes faces in photographs/videos.</p>
<p>40[c] associating the first digital file with the first user-generated tag.</p>	<p>iOS associates the first digital file with the first user-generated tag.</p>




	 <p>In examples where iOS receives alphanumeric text as a first user-generated tag via the Photos application when Photos initially recognizes faces, that tag is associated with the first digital file.</p>
<p><b>41.</b> The method of claim 40, wherein the first user-generated tag includes the name of the first person.</p>	<p>The first user-generated tag can include the name of the first person.</p>

	 <p>This is also true when tagging digital files after Photos recognizes faces.</p>
<p><b>42.</b> The method of claim 41, further comprising exporting the first digital file to a remote device, the exported first digital file including information</p>	<p>iOS exports the first digital file to a remote device, and the exported first digital file includes information associated with the first user-generated tag. For example, iOS can export the first digital file to a remote device such as an Apple MacBook (e.g., via AirDrop). Information associated with the first user-generated tag is exported to the MacBook, as shown below.</p>

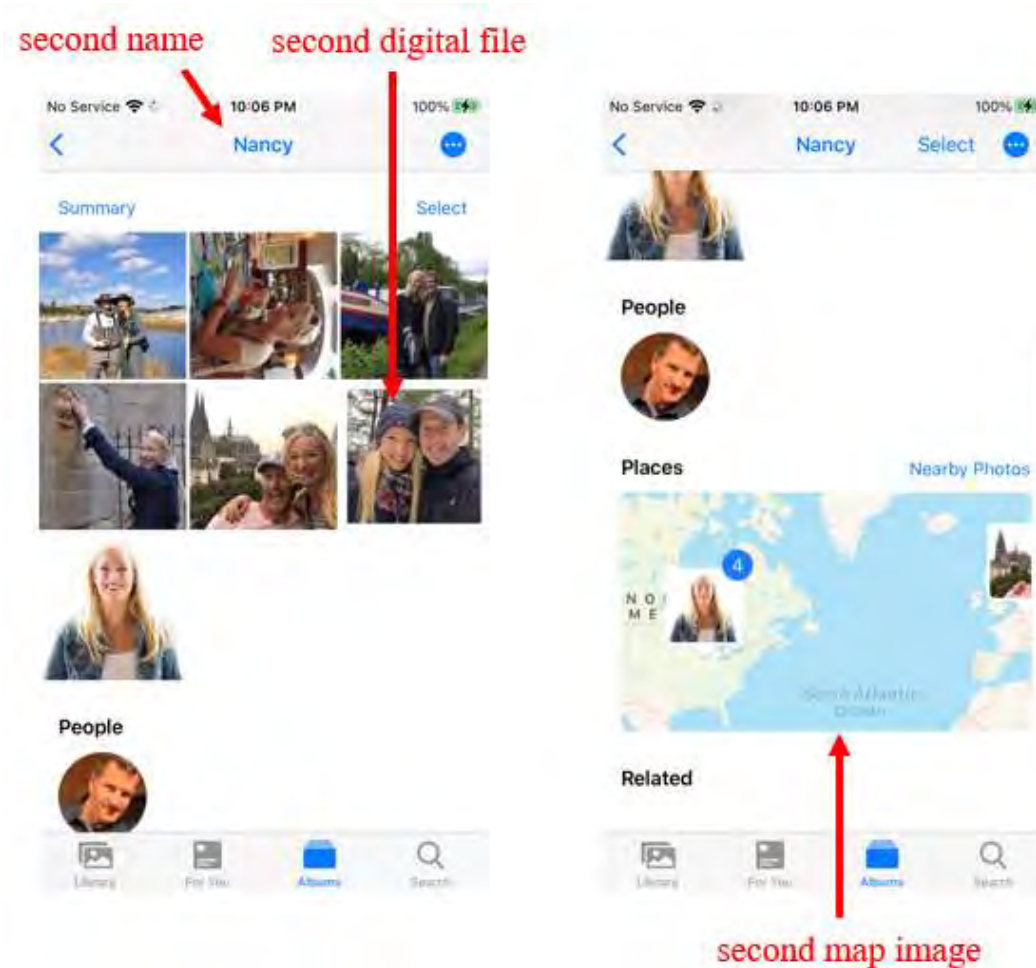
<p>associated with the first user-generated tag.</p>	
<p><b>43[pre]</b> The method of claim 31, wherein</p>	<p>See information for claim 31.</p>
<p><b>43[a]</b> the first person view includes a first group image and</p>	<p>The first person view includes a first group image.</p>

	
<p><b>43[b]</b> responsive to an input that is indicative of a selection of the first group image, causing a first group view to be displayed on the interface, the first</p>	<p>Responsive to an input that is indicative of a selection of the first group image (e.g., tapping the first group image), iOS causes a first group view to be displayed on the interface, the first group view including one or more digital files associated with another person that is associated with the first person.</p>

<p>croup view including one or more digital files associated with another person that is associated with the first person.</p>	 <p>The screenshot shows an iPhone interface for a photo gallery. At the top, the status bar displays 'No Service', '5:15 PM', and '100%' battery. Below the status bar, there is a navigation bar with a back arrow, the name 'Nancy', and a three-dot menu icon. The main content area is titled 'Summary' and 'Select'. It features a grid of six photos: two people on a boat, a person in a boat, two people on a boat, a person pointing at a wall, two people in front of a church, and two people in winter gear. Below the photos is a profile picture of a young woman with blonde hair. Underneath the profile picture is the word 'People' and a circular profile picture of a man. At the bottom, there is a navigation bar with icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p>44. The method of claim 43, wherein the another person is the second person.</p>	<p>The another person is the second person. <i>See</i> information for limitations 31[a][iii]-[iv] and claim 43.</p>

**45.** The method of claim 35, further comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.

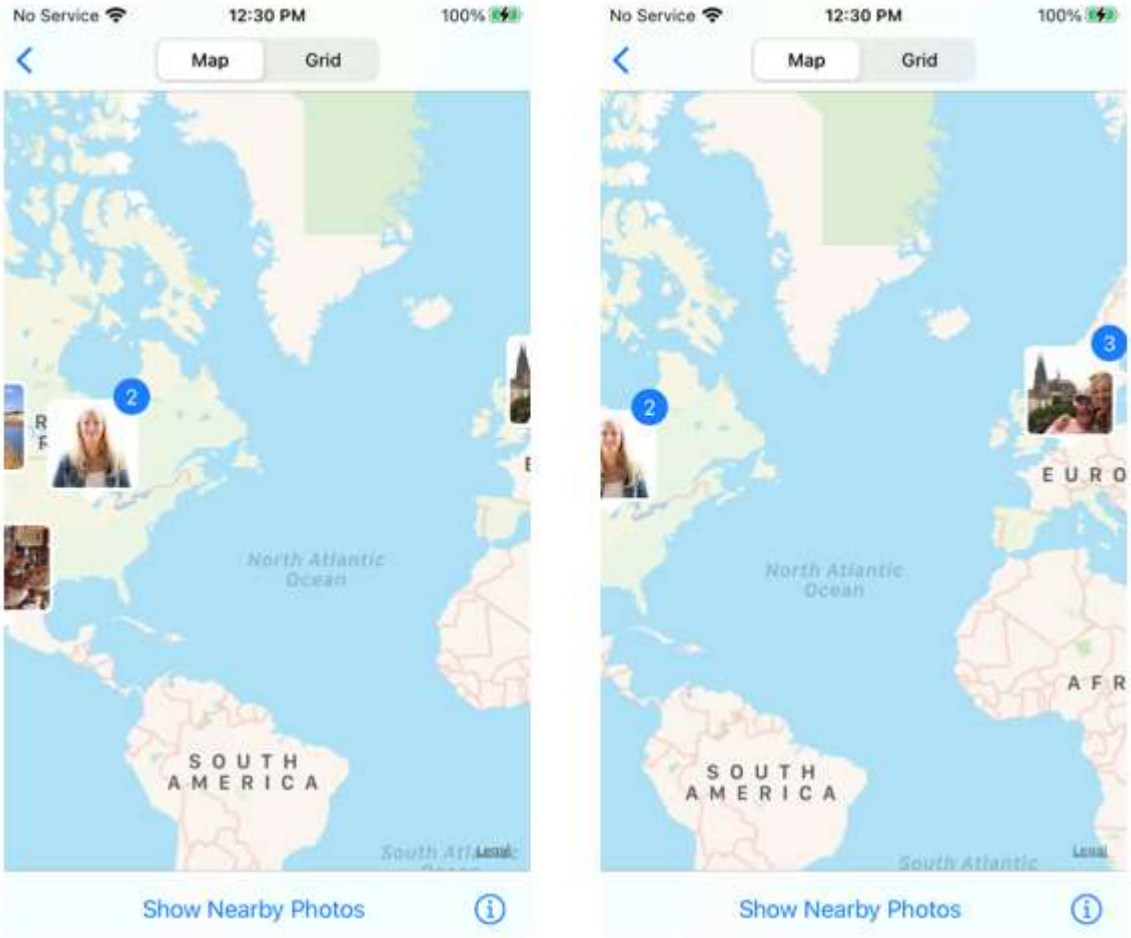
Responsive to an input that is indicative of a selection associated with the second person, iOS causes a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.

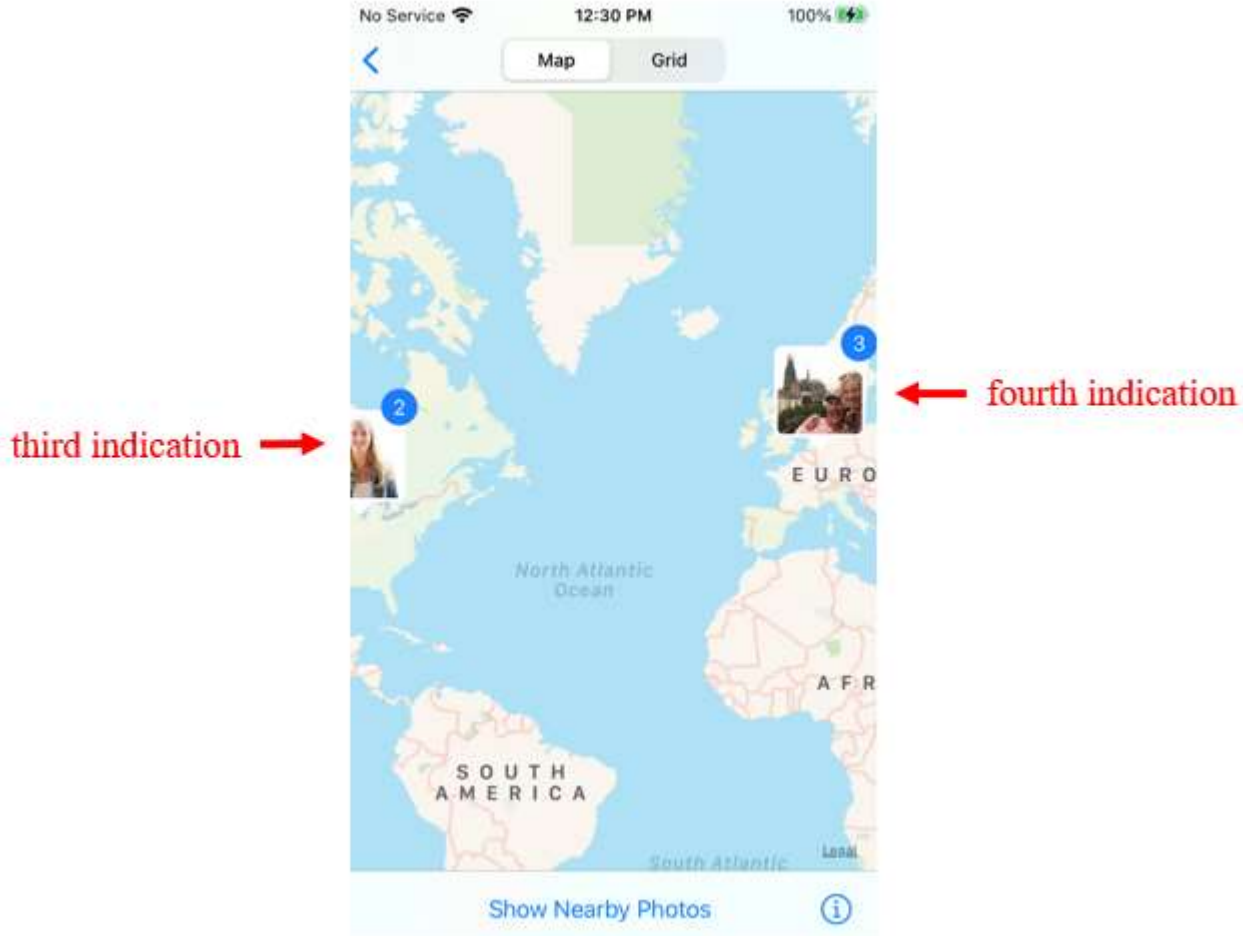




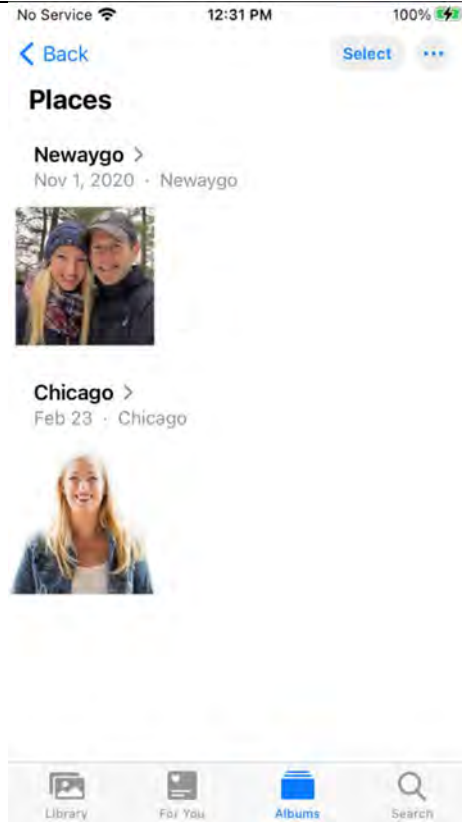
Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

<p><b>46[pre]</b> The method of claim 45, further comprising:</p>	<p><i>See information for claim 45.</i></p>
<p><b>46[a]</b> responsive to an input that is indicative of a selection of the second map image, causing a second location view to be displayed on the interface, <b>46[b]</b> the second location view including: the interactive geographic map,</p>	<p>Responsive to an input that is indicative of a selection of the second map image in the second person view (e.g., tapping the second map image), iOS causes a second location view to be displayed on the interface. The second location view includes an interactive geographic map. The geographic is interactive in that iOS can zoom in or out, or move side to side.</p>

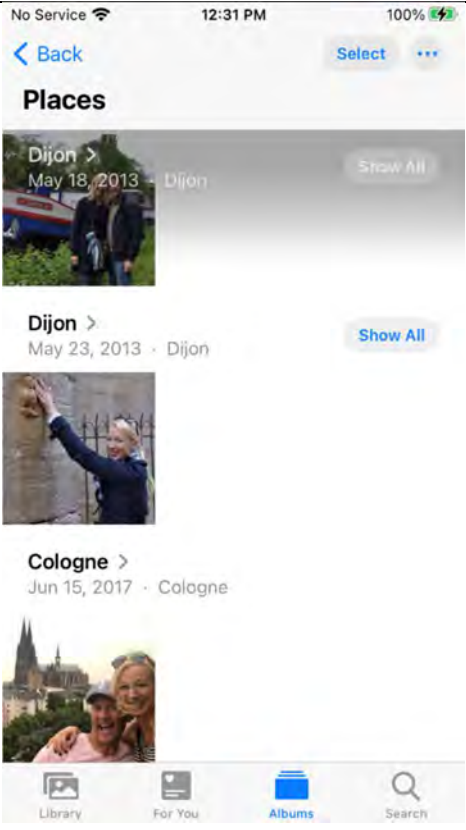
	 <p>The image displays two side-by-side screenshots of an iPhone map application. Both screenshots show a world map centered on the North Atlantic Ocean. The top status bar of each screenshot indicates 'No Service', '12:30 PM', and '100%' battery. Below the status bar, there are navigation buttons for 'Map' and 'Grid'. The map shows several photo thumbnails with blue circular indicators containing numbers. In the left screenshot, a blue circle with the number '2' is positioned over a photo thumbnail in North America. In the right screenshot, a blue circle with the number '2' is positioned over a photo thumbnail in North America, and a blue circle with the number '3' is positioned over a photo thumbnail in Europe. The map also shows labels for 'SOUTH AMERICA', 'North Atlantic Ocean', 'South Atlantic Ocean', 'EURO', and 'AFR'. At the bottom of each screenshot, there is a 'Show Nearby Photos' button and an information icon.</p>
<p>46[c] a third indication positioned at a third location on the interactive</p>	<p>The second location view includes the interactive geographic map, a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.</p>

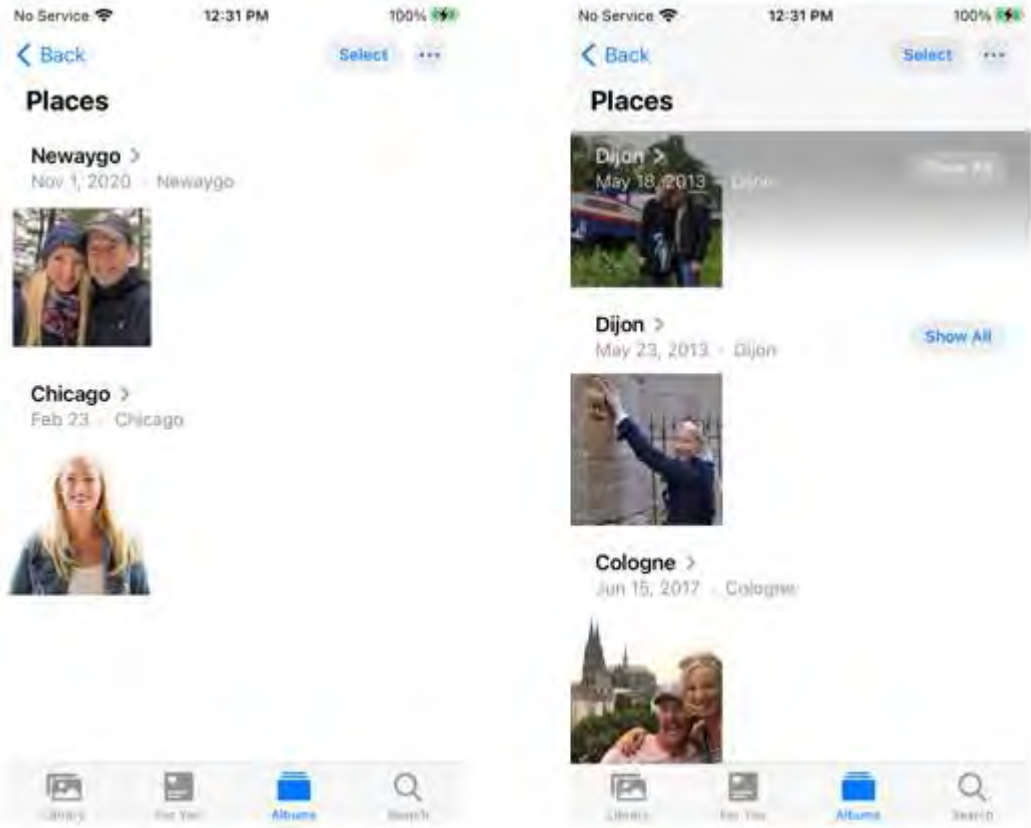
<p>geographic map, and <b>46[d]</b> a fourth indication positioned at a fourth location on the interactive geographic map.</p>	 <p>The screenshot shows an iOS map application interface. At the top, the status bar displays 'No Service', '12:30 PM', and '100%' battery. Below the status bar are navigation controls: a back arrow, a 'Map' button, and a 'Grid' button. The main map area shows a world map with labels for 'North Atlantic Ocean', 'South Atlantic', 'SOUTH AMERICA', 'AFR', and 'EURO'. Two blue circular indicators are overlaid on the map: indicator '2' is positioned over North America and displays a photo of a woman; indicator '3' is positioned over Europe and displays a photo of a city. Red arrows point from the text 'third indication' to indicator '2' and from 'fourth indication' to indicator '3'. At the bottom of the map, there is a 'Show Nearby Photos' button and an information icon.</p>
<p><b>47.</b> The method of claim 46, wherein the third indication is associated with a third set of</p>	<p>The third indication is associated with a third set of digital files and the third location. For example, iOS displays the view below responsive to tapping the third indication.</p>

digital files and the third location, and the fourth indication is associated with a fourth set of digital files and the fourth location.



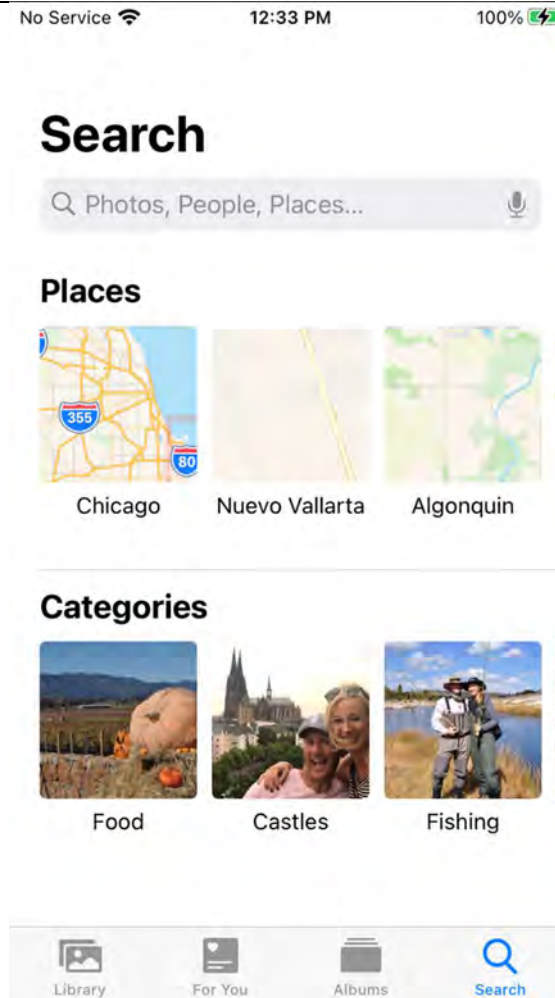
The fourth indication is associated with a fourth set of digital files and the fourth location. For example, iOS displays the view below responsive to tapping the fourth indication.

	 <p>The screenshot shows the Photos app interface on an iPhone. At the top, it displays 'No Service', '12:31 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Back', 'Select', and a three-dot menu. The main content is titled 'Places' and lists three photo albums: 'Dijon &gt;' (May 18, 2013), 'Dijon &gt;' (May 23, 2013), and 'Cologne &gt;' (Jun 15, 2017). Each album has a 'Show All' button. The bottom dock contains icons for Library, For You, Albums, and Search.</p>
<p><b>48.</b> The method of claim 47, wherein the third set of digital files and the fourth set of digital files are associated with the second person.</p>	<p>The third set of digital files and the fourth set of digital files are associated with the second person. As shown below, each of the digital files includes a photograph of the second person.</p>

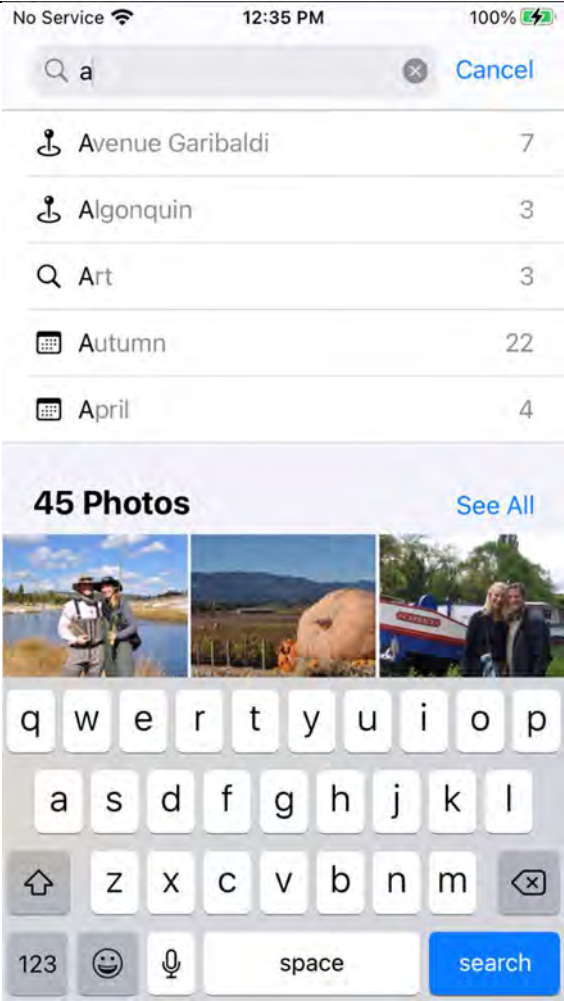
	
<p><b>49.</b> The method of claim 31, further comprising receiving one or more filtering criteria and causing one or more digital files to be displayed on</p>	<p>iOS receives one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, iOS provides filtering criteria based on places (e.g., Chicago) and categories (e.g., food, castles, fishing, birds, animals, etc.).</p>




the interface based at least in part on the one or more filtering criteria.

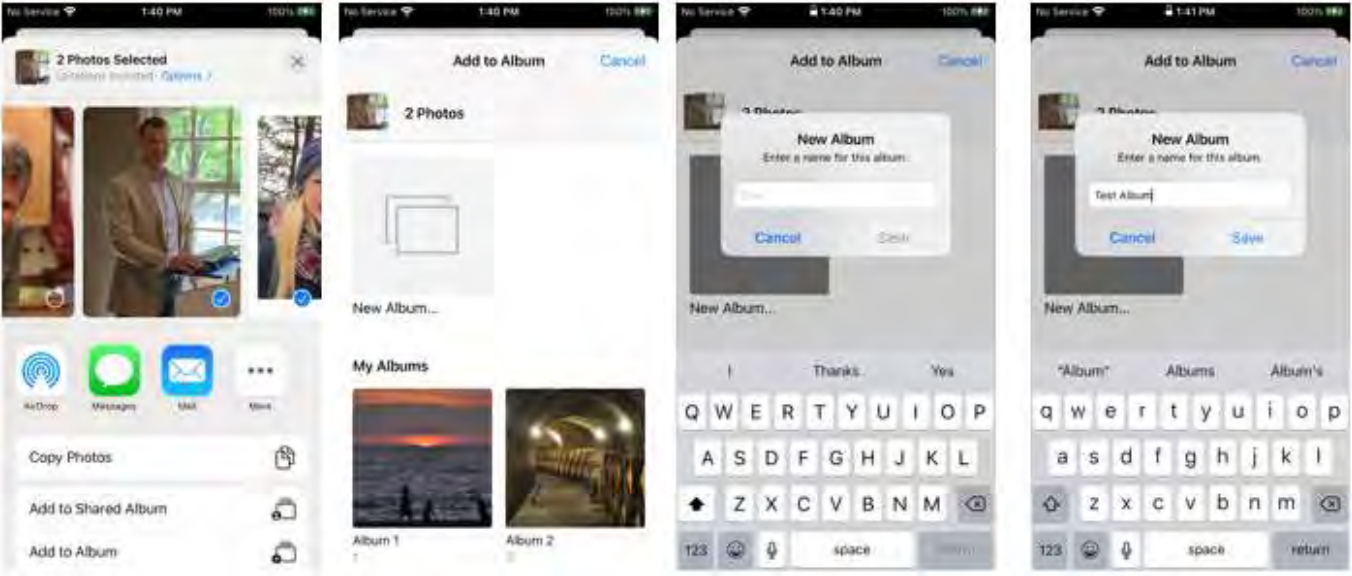


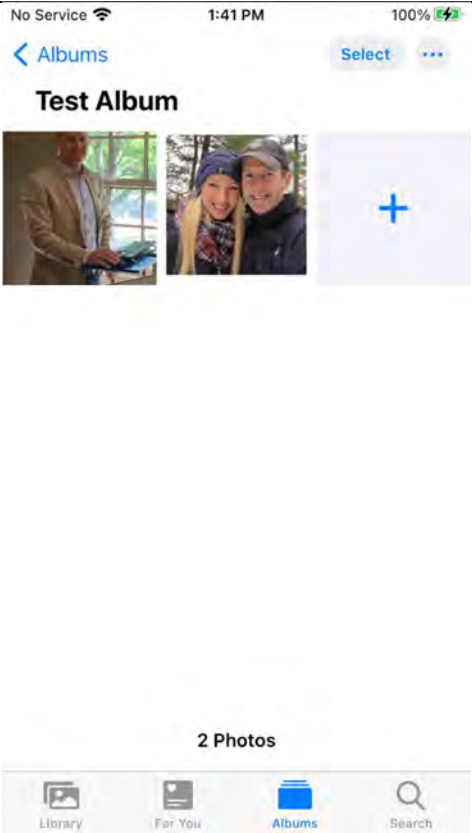
Further, iOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing just the letter “a” as a filtering criterion causes digital files to be displayed based on locations or months starting with the letter “a.”

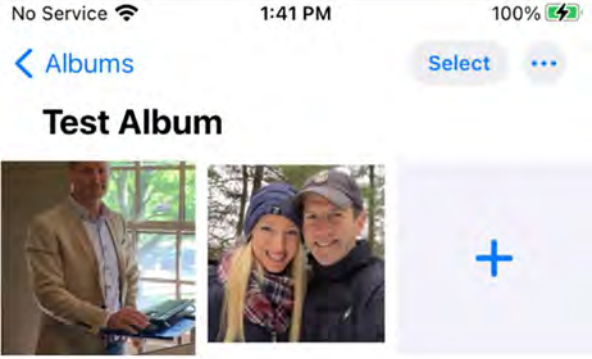
	 <p>The screenshot shows an iPhone search interface. At the top, the status bar displays "No Service", "12:35 PM", and "100%". Below the status bar is a search bar containing the letter "a" and a "Cancel" button. The search results are as follows:</p> <ul style="list-style-type: none"><li>Avenue Garibaldi 7</li><li>Algonquin 3</li><li>Art 3</li><li>Autumn 22</li><li>April 4</li></ul> <p>Below the search results is a section titled "45 Photos" with a "See All" link. Three photo thumbnails are visible: a person fishing, a field with a haystack, and a person on a boat. A keyboard is overlaid on the bottom half of the screen, with the "search" button highlighted in blue.</p> <p>The filtering criteria discussed above are exemplary and it should be understood that iOS may receive many different filtering criteria.</p>
--	--

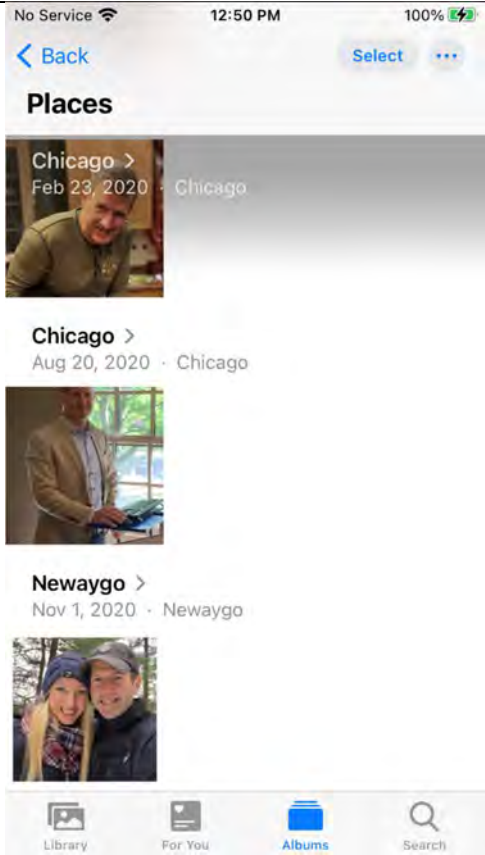
<p><b>50[pre]</b> The method of claim 49, further comprising:</p>	<p>See information for claim 49.</p>
<p><b>50[a]</b> causing a second plurality of images to be displayed on the interface;</p>	<p>iOS causes a plurality of images to be displayed on the interface.</p>  <p>The screenshot shows an iOS photo gallery interface. At the top, it displays 'Feb 23, 2020' and 'Chicago - Lincoln Park'. Below this is a grid of photos. A red box highlights a selection of three photos in the middle row. At the bottom, there are navigation options: 'Years', 'Months', 'Days', and 'All Photos'. The bottom dock shows icons for 'Library', 'For You', 'Albums', and 'Search'.</p>
<p><b>50[b]</b> receiving alphanumeric text as the album name;</p>	<p>iOS receives alphanumeric text as the album name. For example, iOS displays an “Add to Album” option responsive to a selection of the plurality of images. iOS then displays a “New Album” option and a prompt to enter alphanumeric text as the album name.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

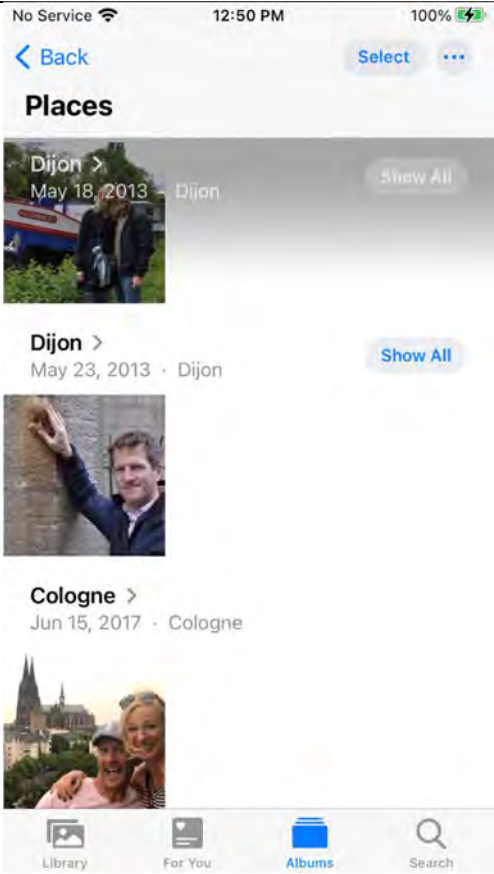
	 <p>The image consists of four sequential screenshots of the iOS Photos app interface. The first screenshot shows two photos selected, with a '2 Photos Selected' header and a 'New Album...' button. The second screenshot shows the 'Add to Album' dialog with a 'New Album...' button. The third screenshot shows the 'New Album' dialog with a text input field containing 'Test Album' and 'Cancel' and 'Save' buttons. The fourth screenshot shows the 'New Album' dialog with a keyboard displayed, showing the text 'Test Album' being entered.</p>
<p>50[c] causing each of the second plurality of images to be associated with an album name; and</p>	<p>iOS causes each of the plurality of images to be associated with an album name. For example, as shown below, each of the plurality of images are displayed with the album name.</p>

	 <p>The screenshot shows the 'Test Album' view in the Photos app. At the top, the status bar displays 'No Service', '1:41 PM', and '100%' battery. Below the status bar, there is a back arrow labeled 'Albums', a 'Select' button, and a three-dot menu icon. The album title 'Test Album' is centered. Below the title, two photo thumbnails are shown: one of a man in a suit and one of a couple. To the right of the photos is a large blue plus sign. At the bottom of the album view, it says '2 Photos'. The bottom navigation bar includes icons for 'Library', 'For You', 'Albums' (which is highlighted), and 'Search'.</p>
<p><b>50[d]</b> causing an album view to be displayed on the interface, the album view including the album name and the second plurality of images.</p>	<p>iOS causes an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>

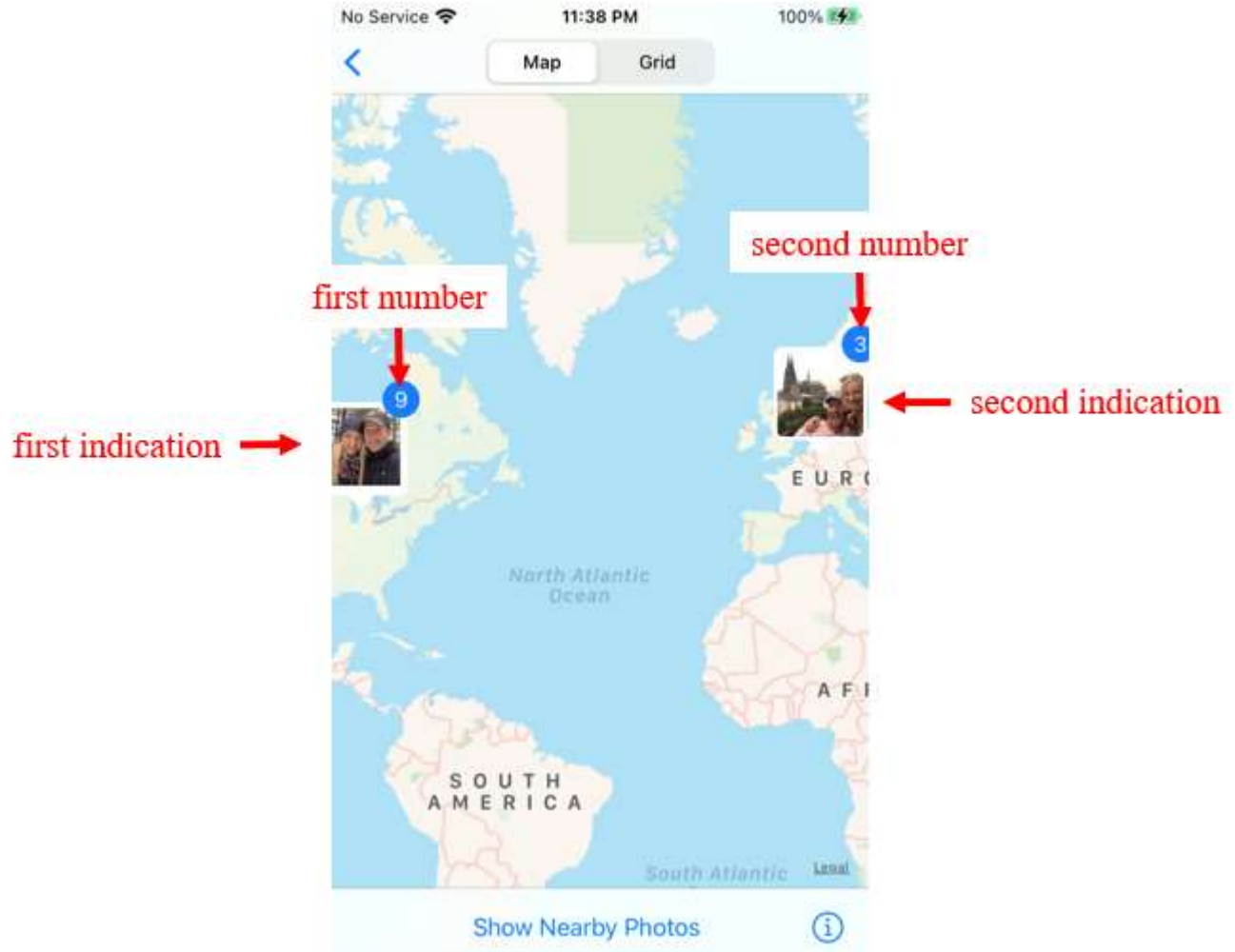
	 <p>The screenshot shows the 'Test Album' interface on an iPhone. At the top, the status bar displays 'No Service', '1:41 PM', and '100%' battery. Below the status bar, there is a back arrow labeled 'Albums', a 'Select' button, and a three-dot menu icon. The album title 'Test Album' is centered. Below the title, there are three items: a photo of a man in a suit, a photo of a man and a woman, and a white square with a blue plus sign.</p>
<p><b>51[pre]</b> The method of claim 32, further comprising</p>	<p><i>See information for claim 32.</i></p>
<p><b>51[a]</b> responsive to a selection associated with the first location, causing the first set of digital files to be displayed on the interface and</p>	<p>Responsive to a selection associated with the first location (e.g., responsive to a touch/tap of the first indication in the first location view) causing the first set of digital files to be displayed on the interface.</p>

	
<p><b>51[b]</b> responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.</p>	<p>Responsive to a selection associated with the second location (e.g., responsive to a touch/tap of the second indication in the first location view) causing the first set of digital files to be displayed on the interface.</p>



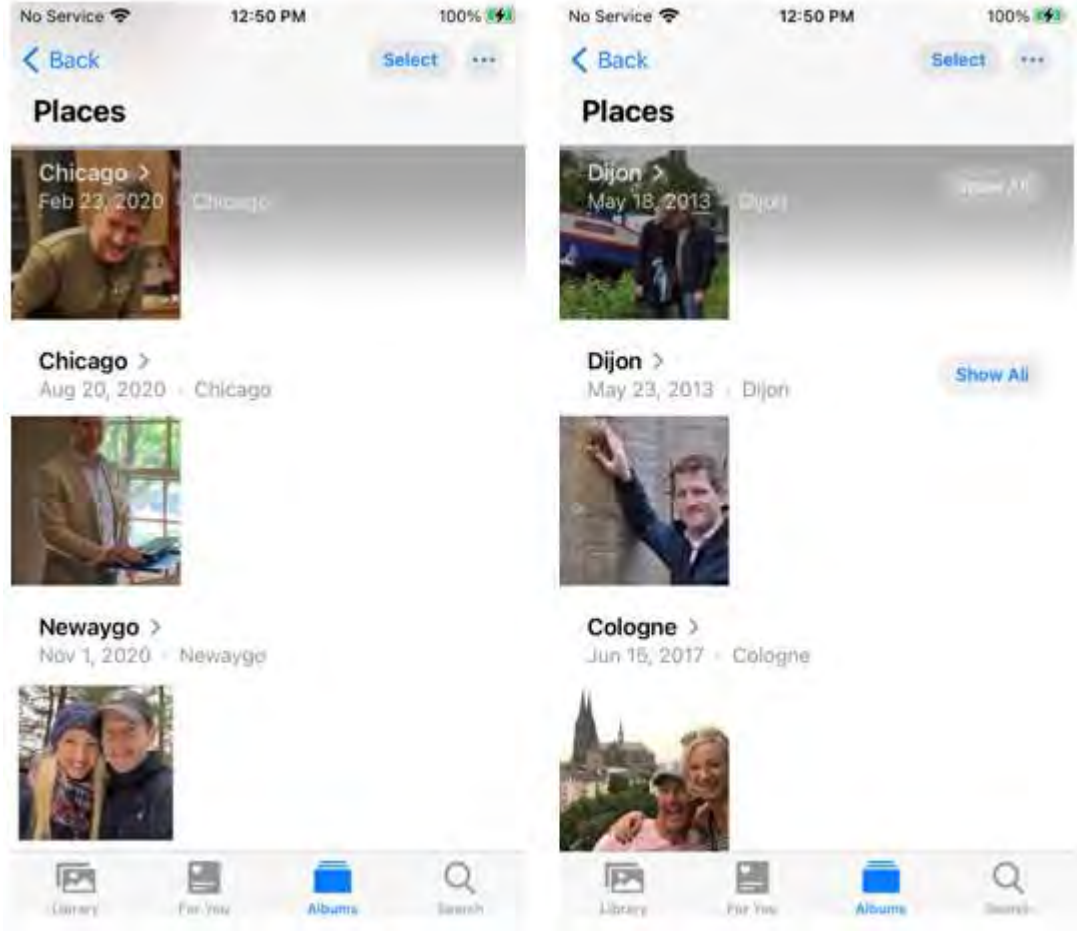
	
<p><b>52.</b> The method of claim 51, further comprising causing (i) a first number associated with a number of digital files in the first set of digital files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files on the interface.</p>	<p>iOS displays (i) a first number associated with a number of digital files in the first set of digital files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files on the interface.</p>

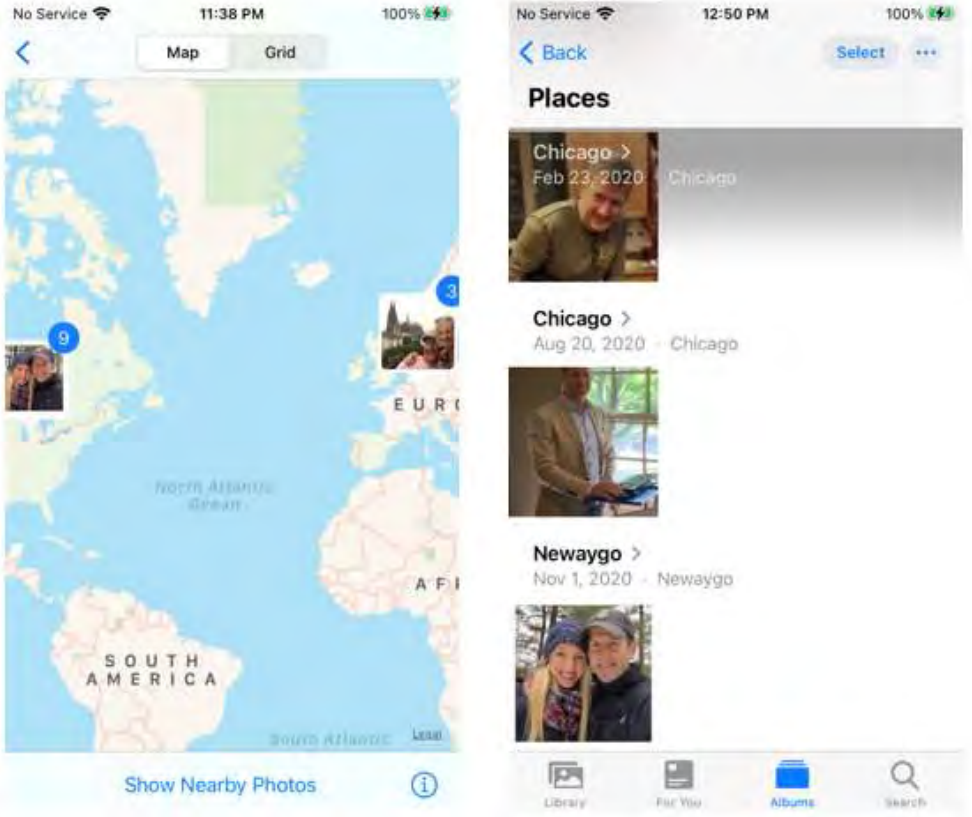
files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.

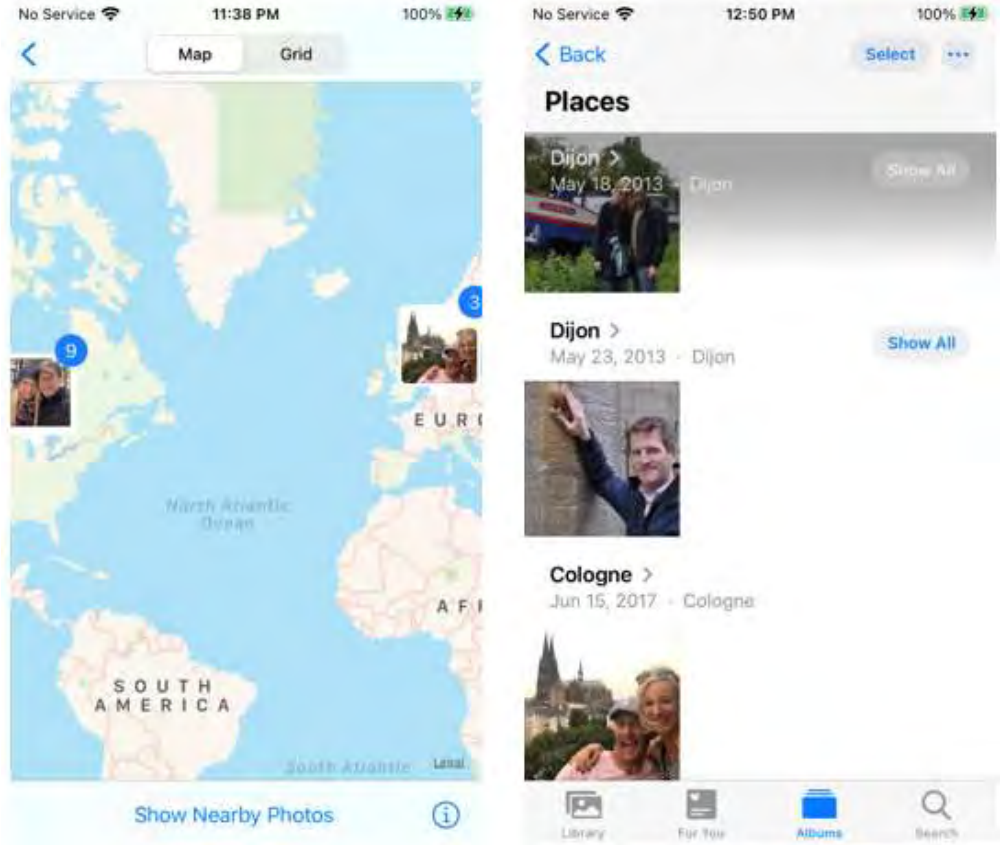


**53.** The method of claim 33, wherein each of the first

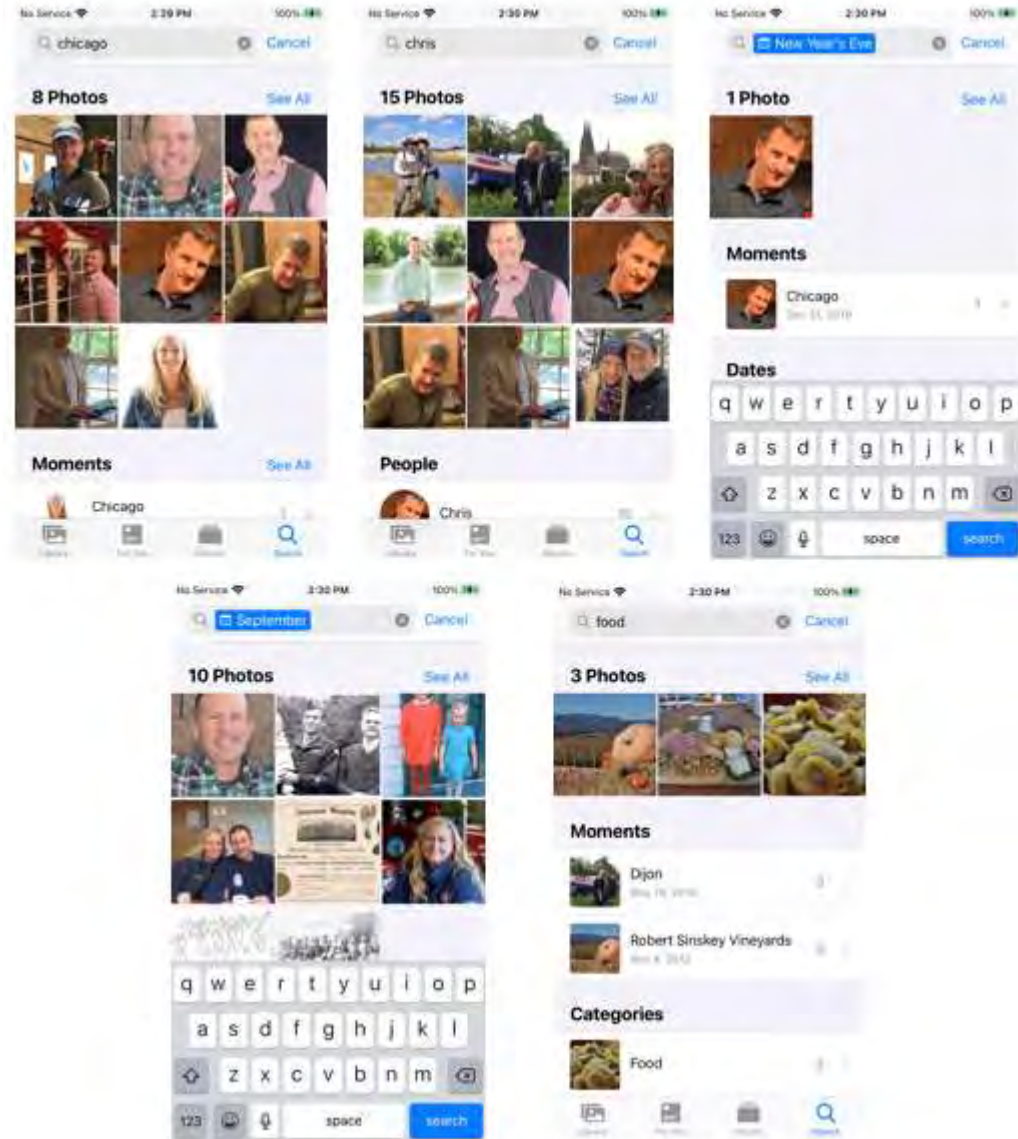
Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

<p>digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.</p>	
<p><b>55[pre]</b> The method of claim 51, wherein</p>	<p><i>See</i> information for claim 51.</p>
<p><b>55[a]</b> the first set of digital files displayed on the</p>	<p>Each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map.</p>

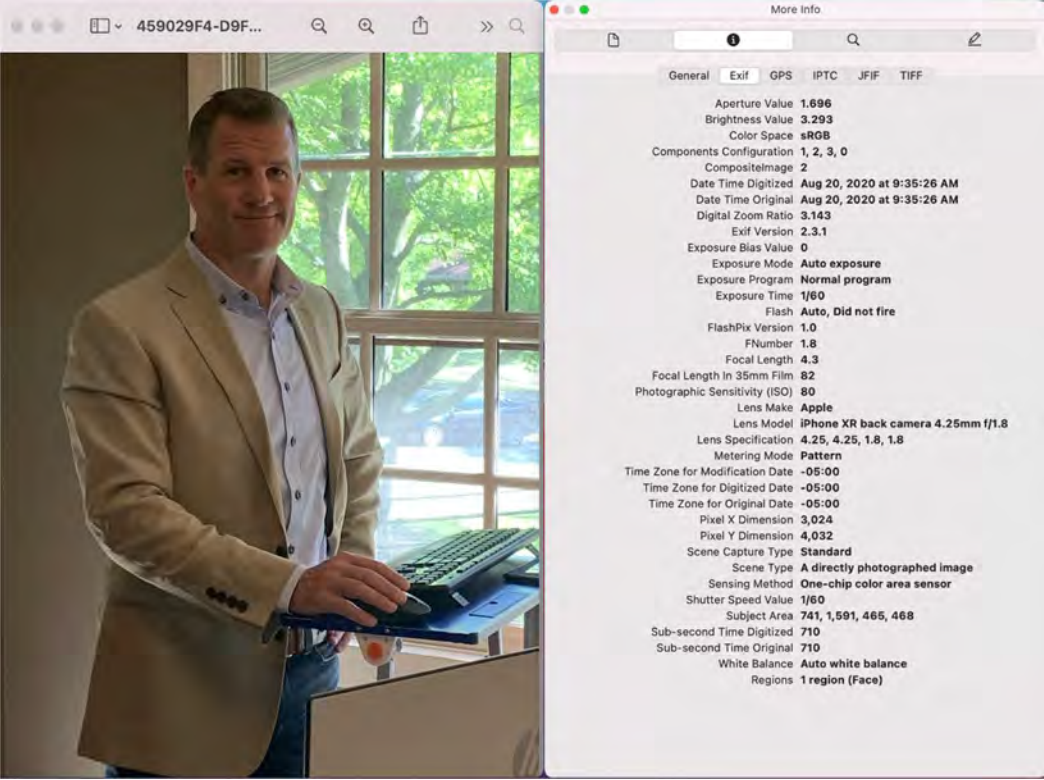
<p>interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map and</p>	
<p><b>55[b]</b> the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>

<p>the interactive geographic map.</p>	
<p><b>56.</b> The method of claim 49, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>

combination thereof.





<p><b>57.</b> The method of claim 42, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file.</p>	<p>Exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file. For example, iOS can export the first digital file to macOS via AirDrop, and EXIF data associated with the first digital file is viewable in macOS.</p>  <p>The image shows a macOS photo viewer window. On the left, a photograph of a man in a light-colored suit jacket standing in front of a window with greenery outside. On the right, the 'More info' sidebar is open, displaying EXIF data for the image. The EXIF data includes: Aperture Value 1.696, Brightness Value 3.293, Color Space sRGB, Components Configuration 1, 2, 3, 0, Composite Image 2, Date Time Digitized Aug 20, 2020 at 9:35:26 AM, Date Time Original Aug 20, 2020 at 9:35:26 AM, Digital Zoom Ratio 3.143, Exif Version 2.3.1, Exposure Bias Value 0, Exposure Mode Auto exposure, Exposure Program Normal program, Exposure Time 1/60, Flash Auto, Did not fire, FlashPix Version 1.0, FNumber 1.8, Focal Length 4.3, Focal Length in 35mm Film 82, Photographic Sensitivity (ISO) 80, Lens Make Apple, Lens Model iPhone XR back camera 4.25mm f/1.8, Lens Specification 4.25, 4.25, 1.8, 1.8, Metering Mode Pattern, Time Zone for Modification Date -05:00, Time Zone for Digitized Date -05:00, Time Zone for Original Date -05:00, Pixel X Dimension 3,024, Pixel Y Dimension 4,032, Scene Capture Type Standard, Scene Type A directly photographed image, Sensing Method One-chip color area sensor, Shutter Speed Value 1/60, Subject Area 741, 1,591, 465, 468, Sub-second Time Digitized 710, Sub-second Time Original 710, White Balance Auto white balance, and Regions 1 region (Face).</p>
<p><b>58.</b> The method of claim 31, wherein the input that is indicative of the selection of the</p>	<p>The input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image associated with the first person. <i>See</i> information for limitation 31[b].</p>



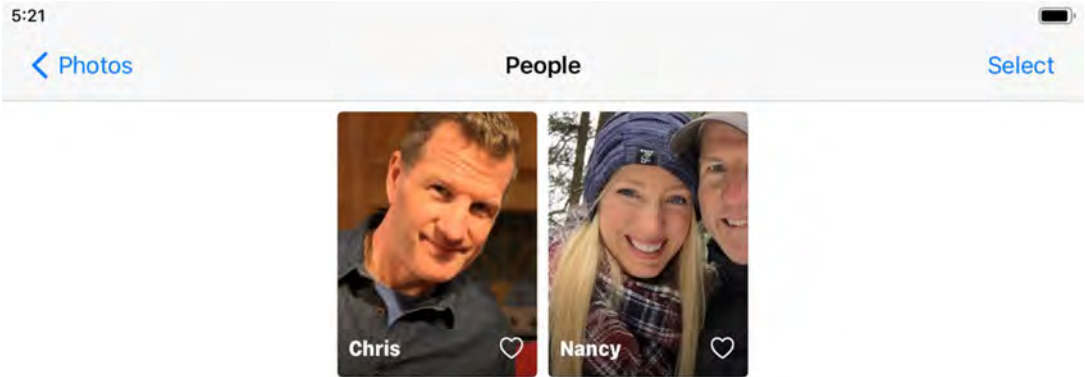
Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

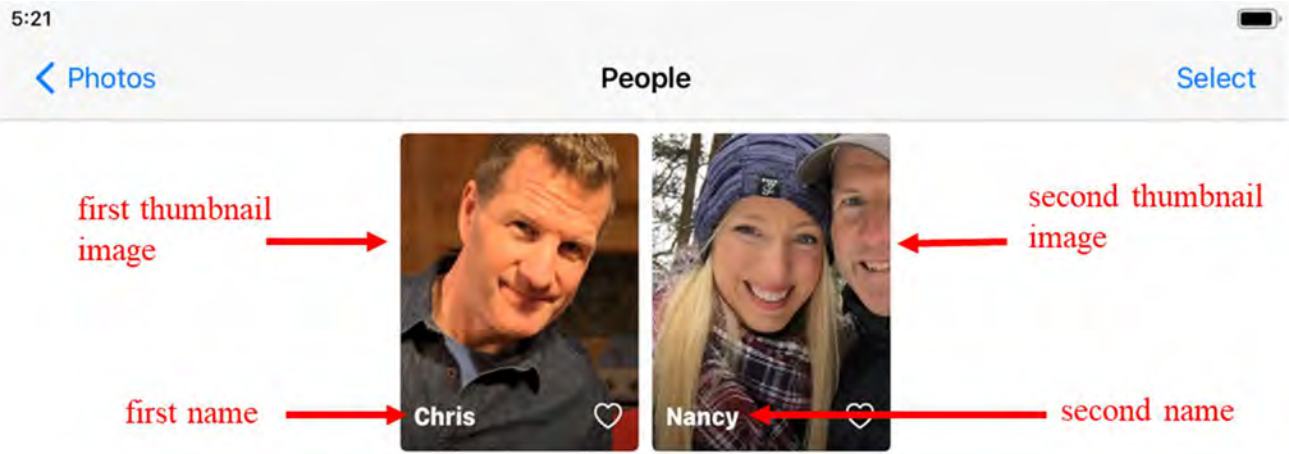
<p>first person includes a touch or click of the first thumbnail image associated with the first person.</p>	
<p><b>59.</b> The method of claim 31, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.</p>	<p>The input that is indicative of the selection of the first map image is a touch or click of the first map image. <i>See</i> information for limitation 31[c].</p>

# **Exhibit D.2**

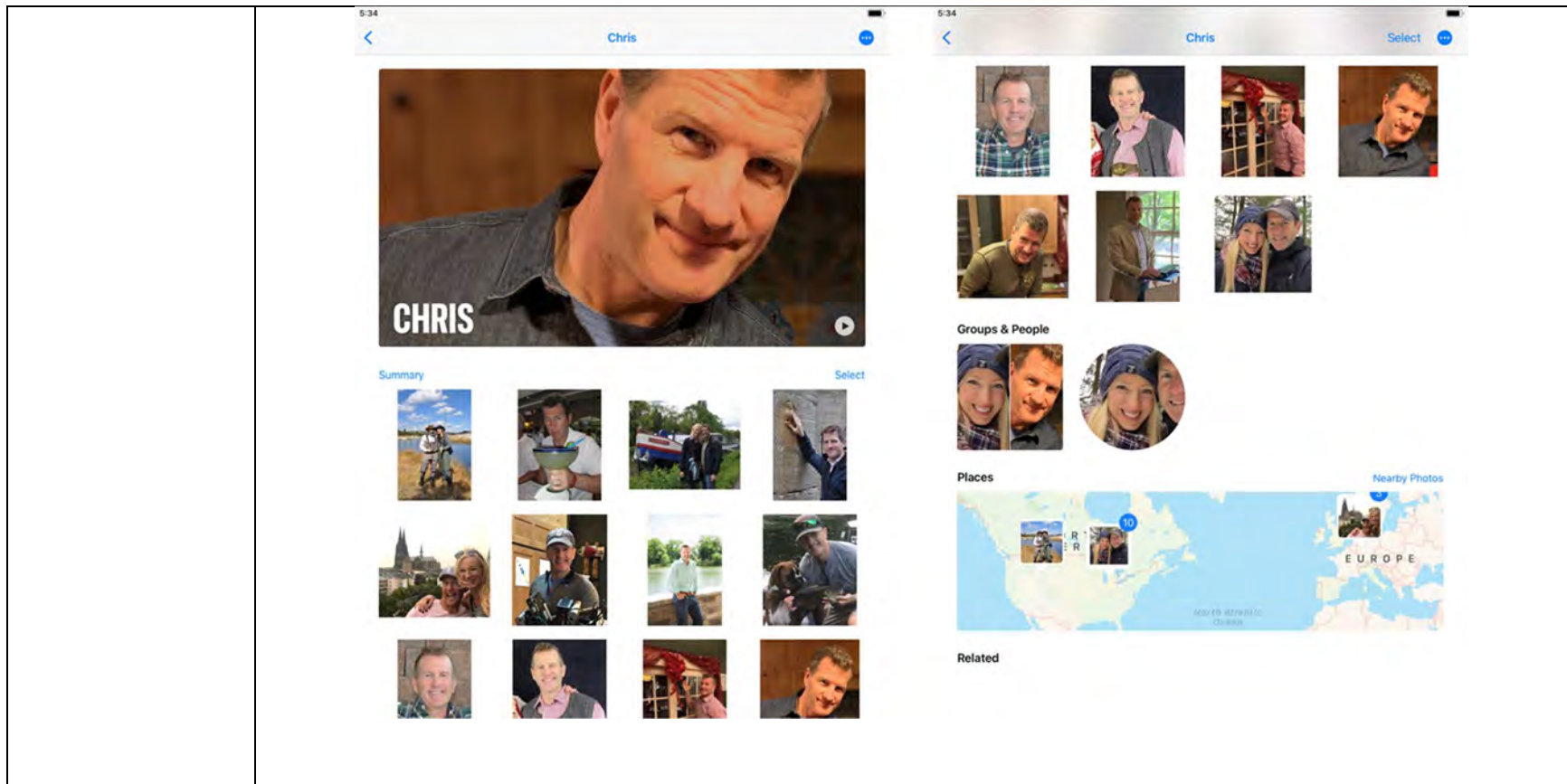
**U.S. Patent No. 11,017,020 – Infringement Claim Chart**

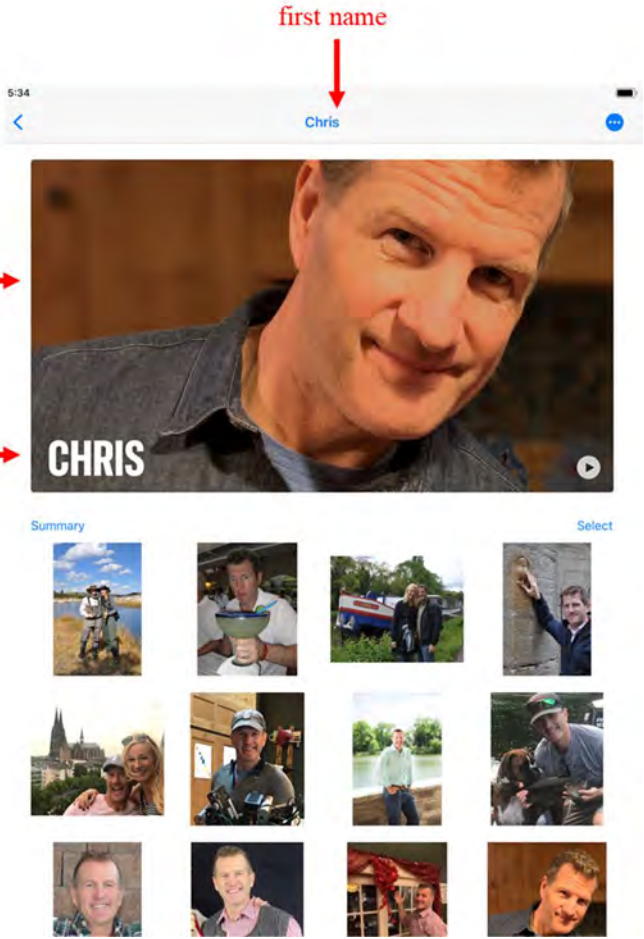
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 11,017,020 (“the ‘020 patent”) in the Apple iPadOS Photos application. The exemplary screenshots below were taken using an Apple iPad mini (5<sup>th</sup> Generation) running iPadOS 14.6. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<p><b>I[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, iPadOS performs a method, as set forth below.</p>
<p><b>I[a]</b> causing an interface to display a people view, the people view including:</p>	<p>iPadOS causes an interface (e.g., Apple iPad) to display a people view.</p> 

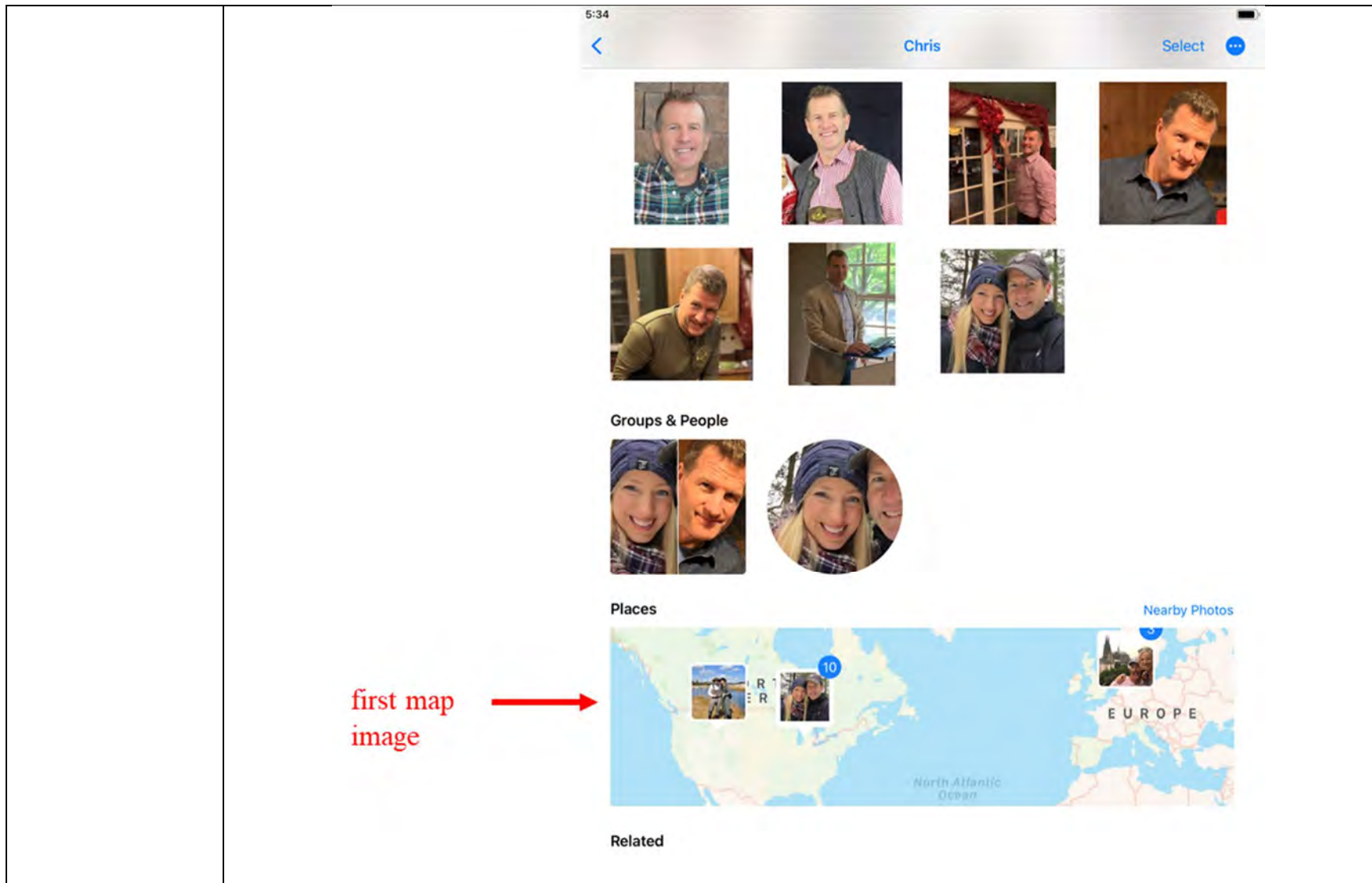
<p><b>1[a][i]</b> a first thumbnail image associated with a first person,  <b>1[a][ii]</b> a first name associated with the first person,  <b>1[a][iii]</b> a second thumbnail image associated with a second person, and  <b>1[a][iv]</b> a second name associated with the second person;</p>	<p>The people view includes (1) a first thumbnail image associated with a first person, (2) a first name associated with the first person, (3) a second thumbnail image associated with a second person, and (4) a second name associated with the second person.</p>  <p>The screenshot shows the 'People' view on an iPadOS interface. At the top, there is a status bar with the time '5:21' and a battery icon. Below the status bar, there is a navigation bar with a back arrow labeled 'Photos', the title 'People', and a 'Select' button. The main content area displays two person thumbnails. The first thumbnail is a portrait of a man, and the second is a portrait of a woman. Red arrows point from text labels to the thumbnails and names. The label 'first thumbnail image' points to the first thumbnail. The label 'first name' points to the name 'Chris' below the first thumbnail. The label 'second thumbnail image' points to the second thumbnail. The label 'second name' points to the name 'Nancy' below the second thumbnail. Both names have a small heart icon to their right.</p>
<p><b>1[b]</b> responsive to an input that is indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:</p>	<p>Responsive to an input that is indicative of a selection associated with the first person (e.g., tapping the first thumbnail image in the people view), iPadOS causes a first person view to be displayed on the interface.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS



<p><b>1(b)(i)</b> a first digital file associated with the first person, <b>1(b)(ii)</b> the first name associated with the first person, and</p>	<p>The first person view includes a first digital file associated with the first person and the first name associated with the first person.</p>  <p>The screenshot shows a contact card for 'Chris' on an iPadOS interface. At the top, the name 'Chris' is displayed in blue text, with a red arrow pointing to it from the label 'first name' above. Below the name is a large video thumbnail of a man's face, with a red arrow pointing to it from the label 'first digital file' to its left. Underneath the video is a photo gallery grid with the name 'CHRIS' overlaid in white text. A red arrow points from the label 'first name' to the name 'CHRIS'. The photo gallery includes a 'Summary' section with four thumbnails and a 'Select' button. The thumbnails show various photos of the man and other people.</p>
<p><b>1(b)(iii)</b> a first map image;</p>	<p>The first person view also includes a first map image.</p>

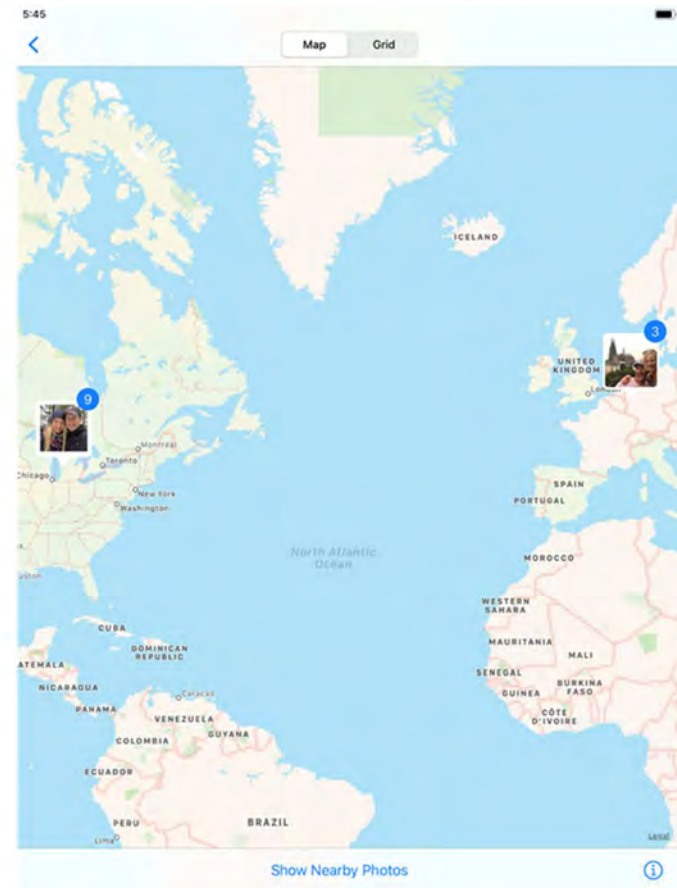
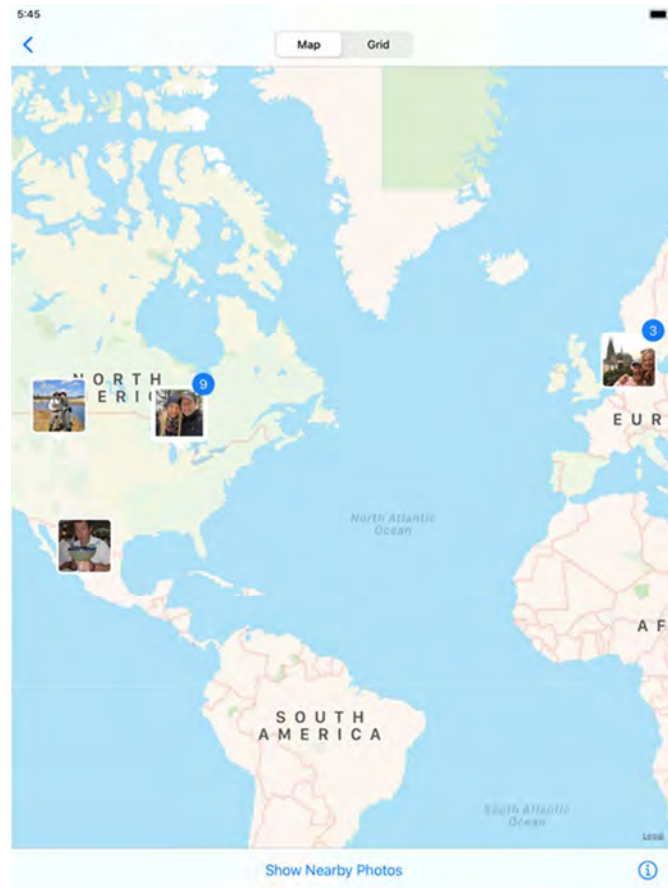




first map image →

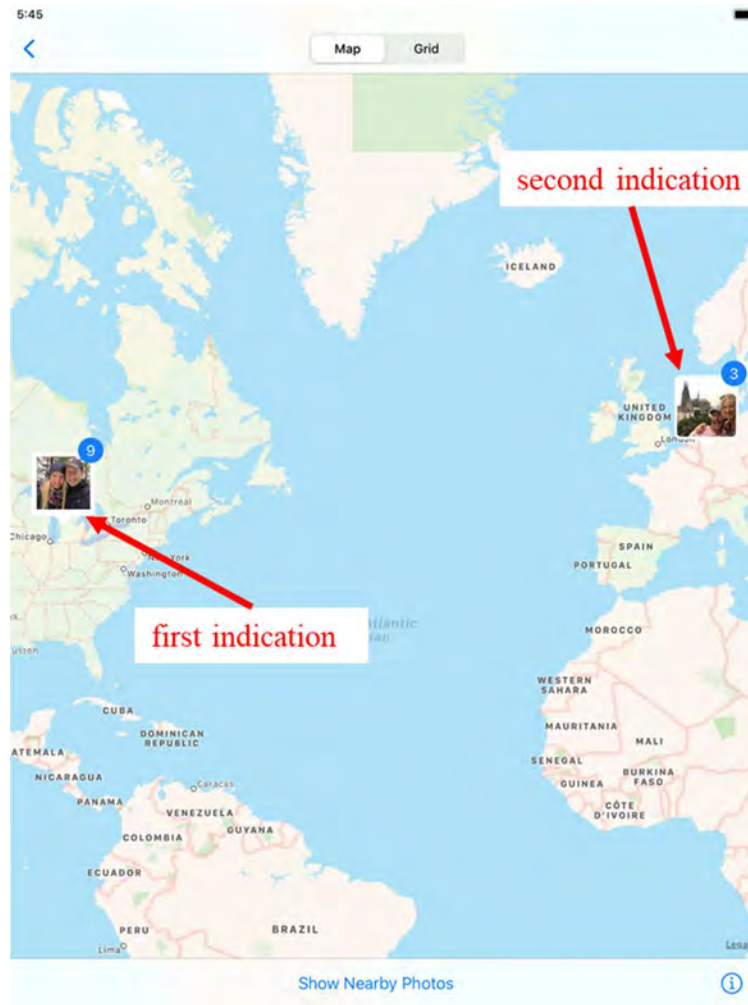
1[c] responsive to an input that is indicative of a selection of the first map image in the first person view, causing a first location view to be displayed on the interface, the first location view including: 1[c] an interactive geographic map,

Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), iPadOS causes a first location view to be displayed on the interface. The first location view includes an interactive geographic map. The geographic is interactive in that iPadOS can zoom in or out, or move side to side.



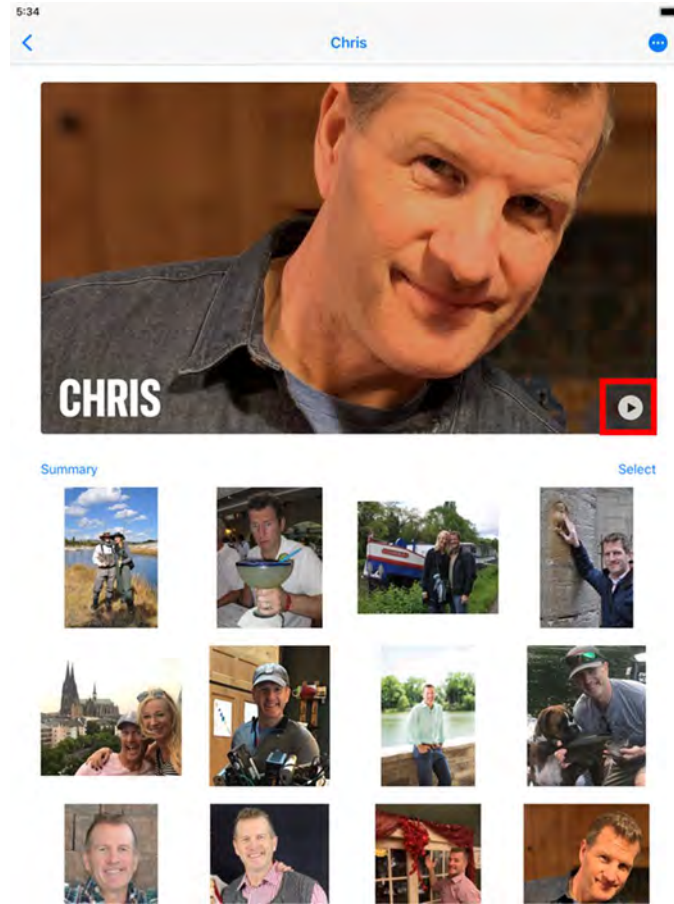
**1[c][ii]**  
a first indication positioned at a first location on the interactive geographic map, and **1[c][iii]**  
a second indication positioned at a second location on the interactive geographic map;  
and

The first location view includes a first indication positioned at a first location on the interactive geographic map and a second indication positioned at a second location on the interactive geographic map.



**1[d]** responsive to an input that is indicative of a selection of the first digital file in the first person view, causing a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.

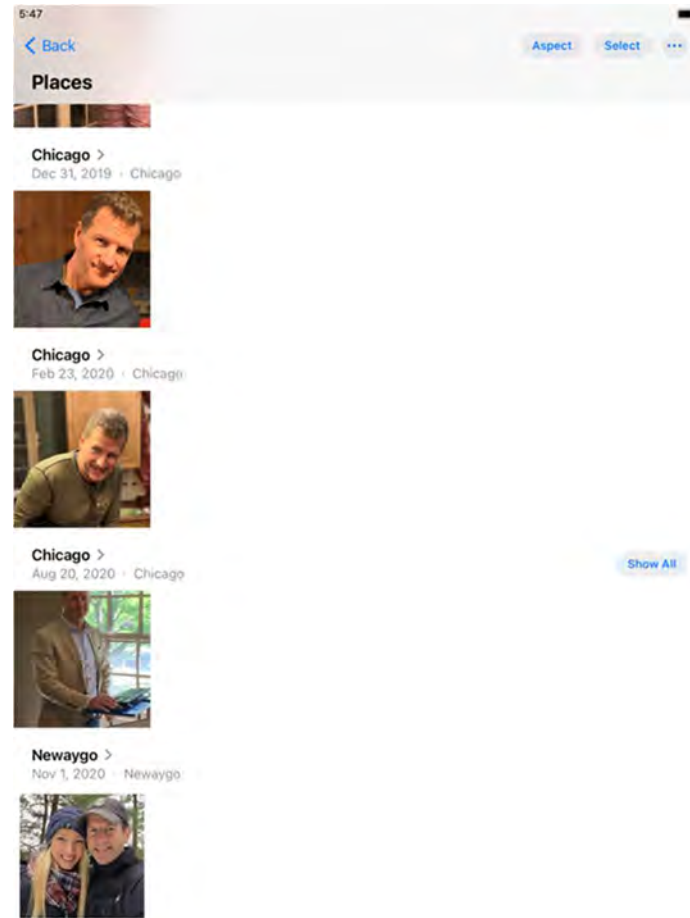
Responsive to an input that is indicative of a selection of the first digital file in the first person view (e.g., the “Play” element annotated below), iPadOS causes a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.



See MW\_Apple\_003184 for an exemplary slideshow.

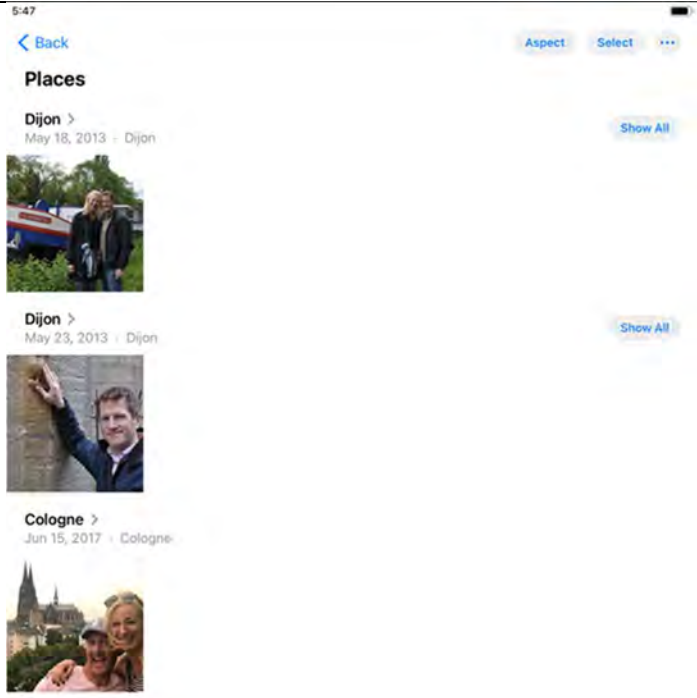
2. The method of claim 1, wherein the first indication is associated with a first set of digital files and the first location, and the second indication is associated with a second set of digital files and the second location.

The first indication is associated with a first set of digital files and the first location.



The second indication is associated with a second set of digital files and the second location.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

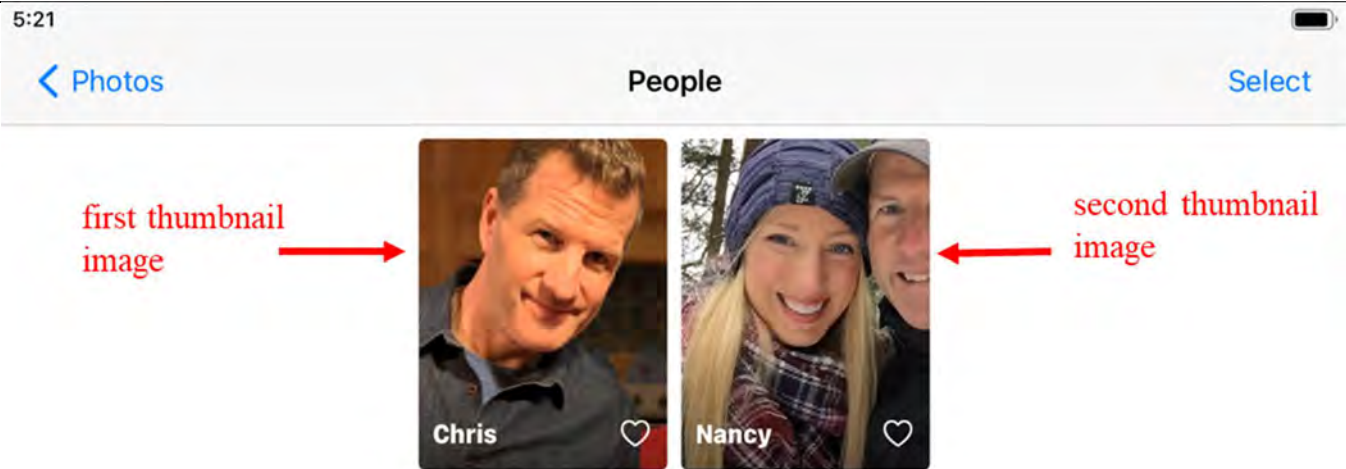
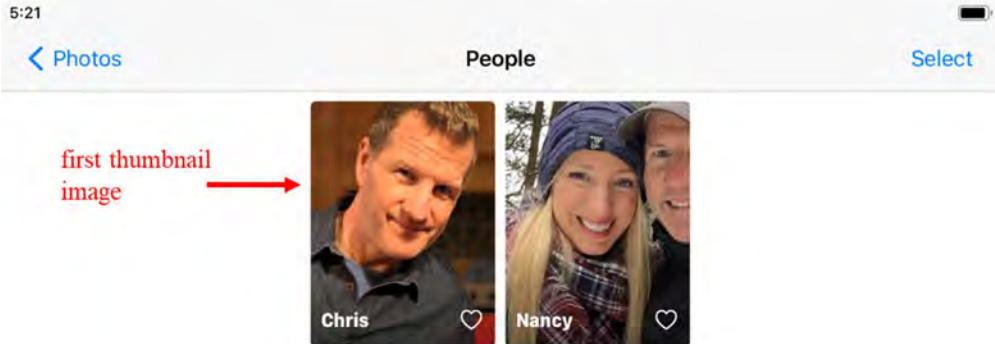
	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button and 'Aspect', 'Select', and a three-dot menu icon. The gallery is titled 'Places' and contains three entries:</p> <ul style="list-style-type: none"> <li><b>Dijon</b> &gt; (May 18, 2013 · Dijon): A photo of two people standing in front of a boat.</li> <li><b>Dijon</b> &gt; (May 23, 2013 · Dijon): A photo of a man pointing at a stone wall.</li> <li><b>Cologne</b> &gt; (Jun 15, 2017 · Cologne): A photo of two people in front of a church.</li> </ul> <p>Each entry has a 'Show All' button to its right.</p>
<p><b>3.</b> The method of claim 2, wherein the first set of digital files and the second set of digital files are associated with the first person.</p>	<p>The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first and second sets of digital files include photographs of the first person.</p>

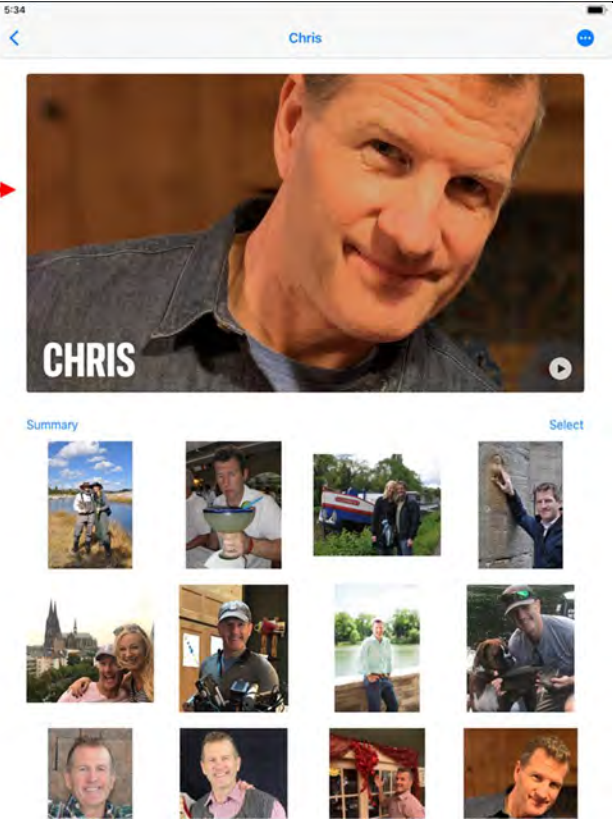


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

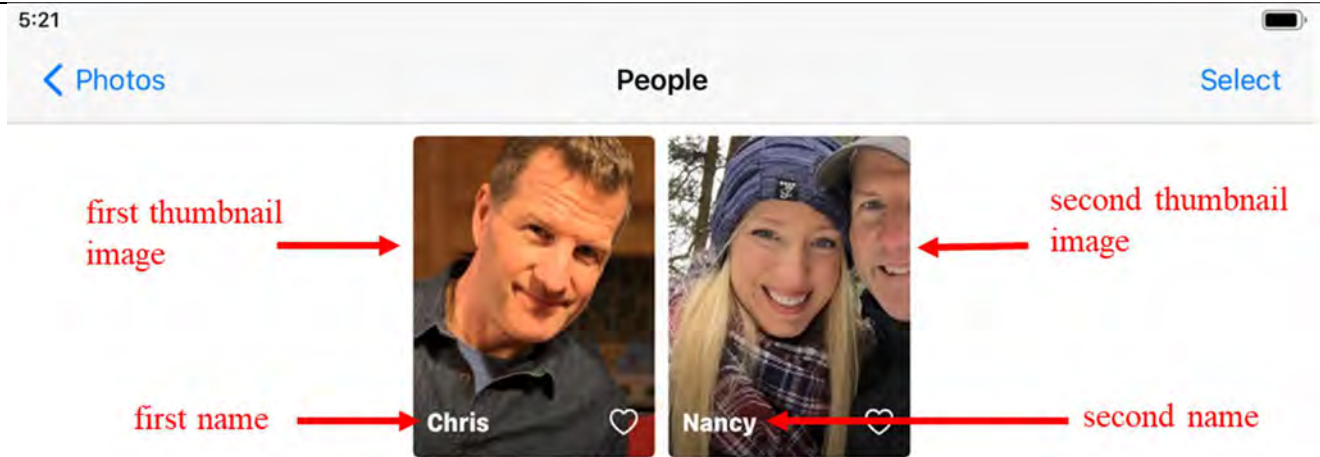
<p>4. The method of claim 3, wherein the first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>	<p>The first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>



<p>images includes at least a portion of a face of the second person.</p>	 <p>5:21</p> <p>&lt; Photos People Select</p> <p>first thumbnail image →</p> <p>← second thumbnail image</p> <p>Chris Nancy</p>
<p>5. The method of claim 4, wherein the first thumbnail image includes at least a portion of the first digital file.</p>	<p>The first thumbnail image in the people view includes at least a portion of the first digital file in the first person view.</p>  <p>5:21</p> <p>&lt; Photos People Select</p> <p>first thumbnail image →</p> <p>Chris Nancy</p>

	 <p>The screenshot shows a contact page for 'Chris'. At the top, the name 'Chris' is displayed. Below it is a large portrait photo of a man. A red arrow points to this photo with the text 'first digital file'. Underneath the main photo is a grid of smaller thumbnail images. The name 'CHRIS' is printed in white on the bottom left of the main photo.</p>
<p><b>6.</b> The method of claim 4, wherein, in the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image</p>	<p>In the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image and the second name is displayed adjacent to the second thumbnail image.</p>

and the second name is displayed adjacent to the second thumbnail image.

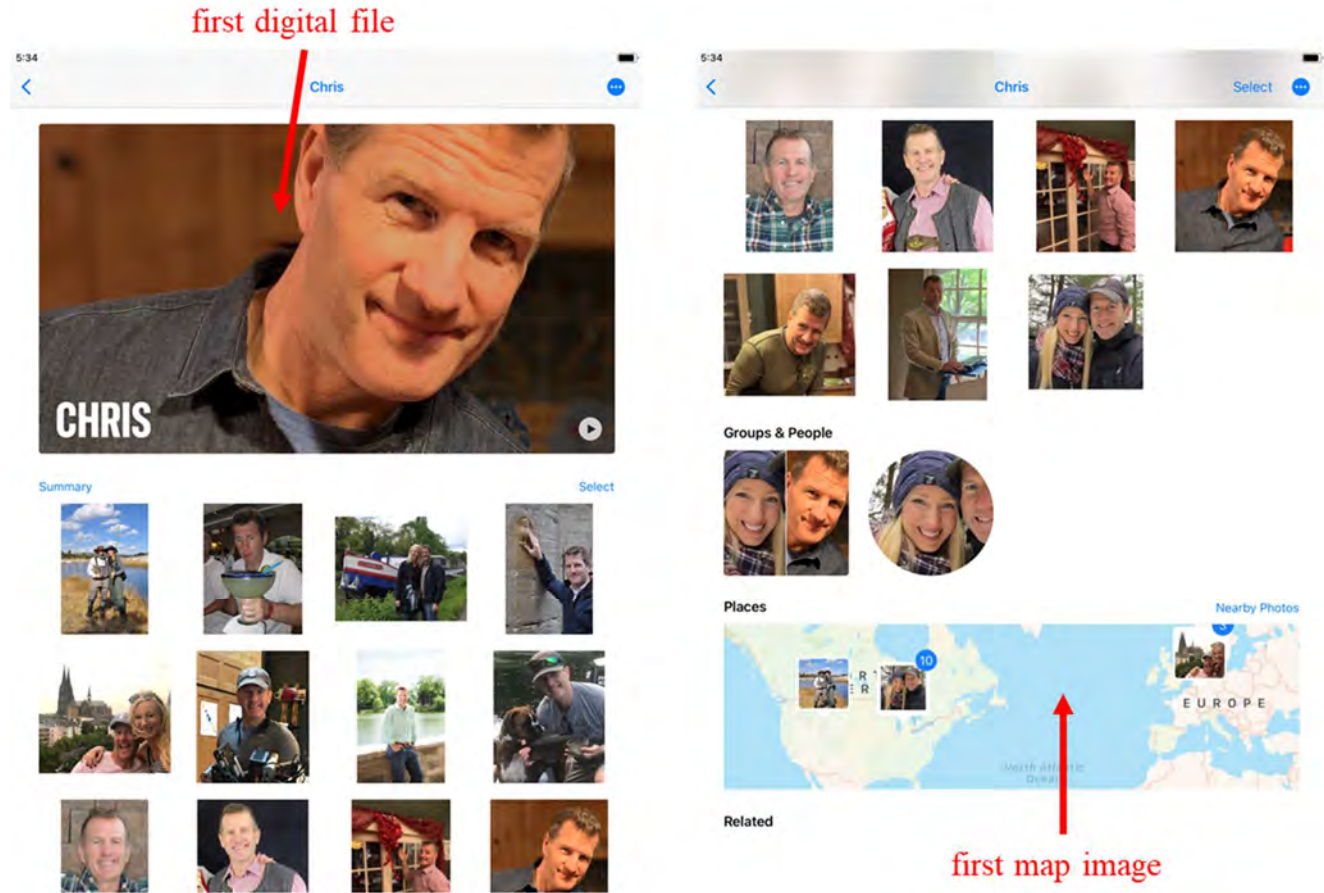


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate the name of the first person that is associated with the first thumbnail image. The way the claimed displaying performs this function is by displaying the first name in sufficient proximity to the first thumbnail image such that a user will associate the first name with the first thumbnail image. The result of the claimed displaying is that the first name is associated with the first thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name is to communicate the name of the second person that is associated with the second thumbnail image. The way the claimed displaying performs this function is by displaying the second name in sufficient proximity to the second thumbnail image such that a user will associate the second name with the second thumbnail image. The result of the claimed displaying is that the second name is associated with the second thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

**7.** The method of claim 6, wherein, in the first person view, the first map image is positioned below the first digital file.

In the first person view, the first map image is positioned below the first digital file.



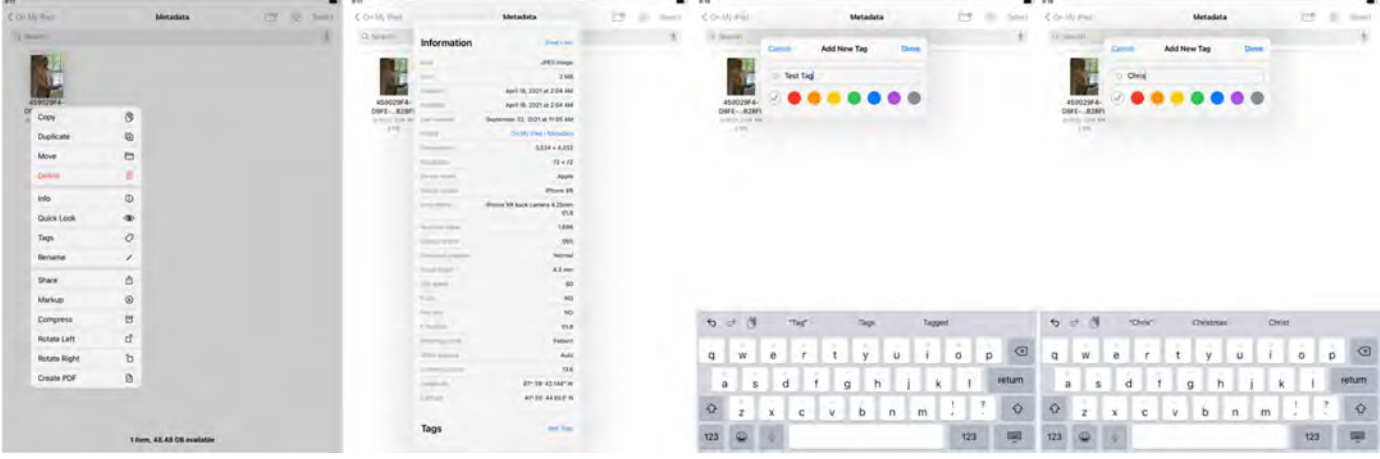
**8.** The method of claim 1, further comprising, prior to the causing the

*See information for claim 1.*

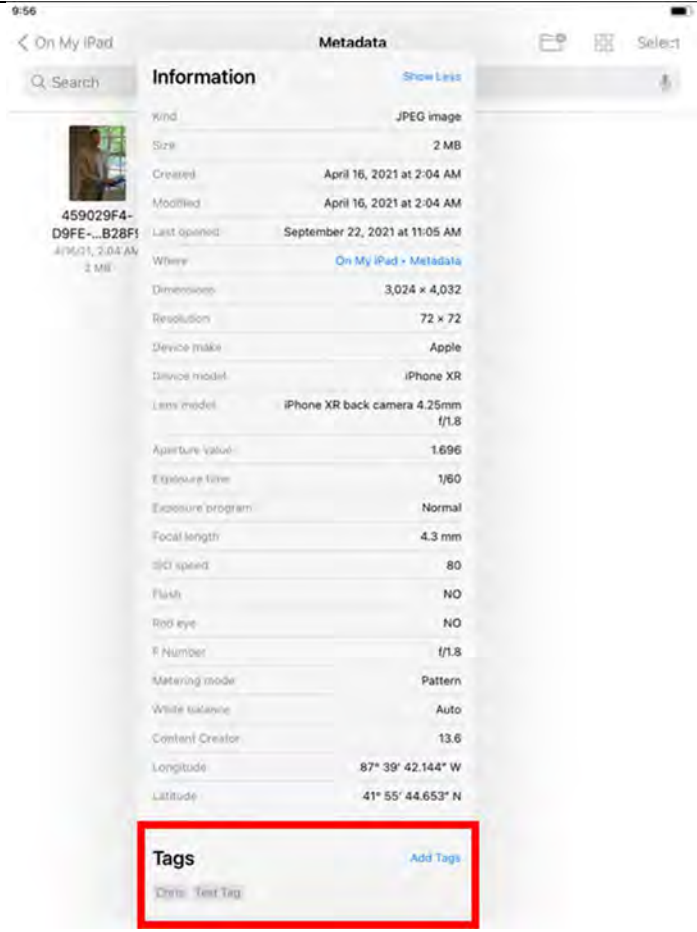
<p>interface to display the people view:</p>	
<p><b>8[a]</b> causing the first digital file to be displayed on the interface;</p>	<p>Prior to the causing the interface to display the people view, iPadOS causes the first digital file to be displayed on the interface.</p> 
<p><b>8[b]</b> receiving alphanumeric text as a first user-generated tag; and</p>	<p>iPadOS receives alphanumeric text as a first user-generated tag. As a first example, iPadOS receives alphanumeric text as a first user-generated tag via the Files application.</p>



Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

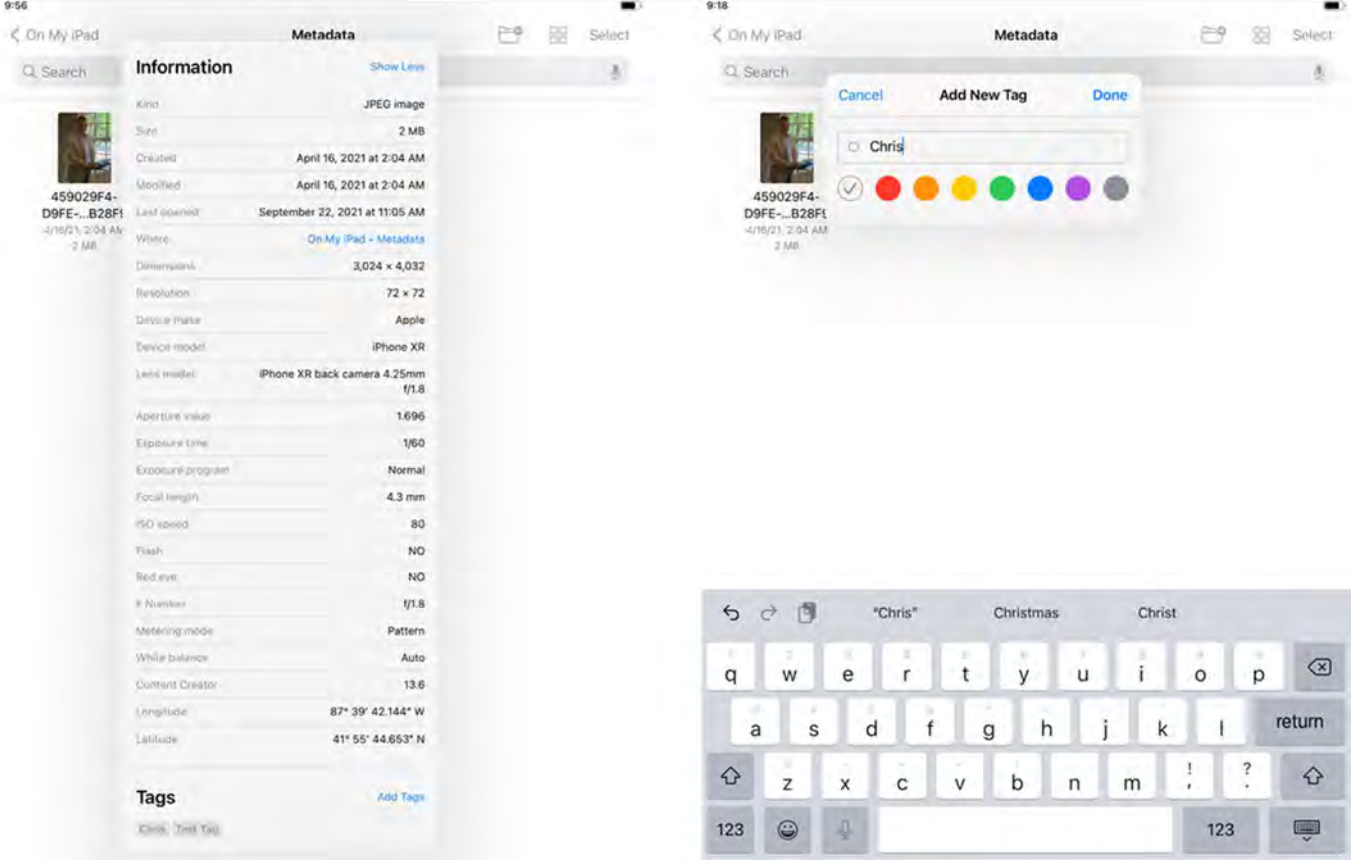
	 <p>The image displays four sequential screenshots of the iPadOS Metadata interface. The first screenshot shows a file with a context menu open, highlighting the 'Tags' option. The second screenshot shows the 'Information' page for the file, listing various metadata fields. The third screenshot shows the 'Add New Tag' dialog box with a 'Test Tag' entered. The fourth screenshot shows the 'Add New Tag' dialog box with 'Chris' entered. Below the screenshots are two keyboard overlays: the first shows the 'Tag' keyboard with 'Tagged' above it, and the second shows the 'Chris' keyboard with 'Christmas' and 'Christ' above it.</p>
<p>8[c] associating the first digital file with the first user-generated tag.</p>	<p>iPadOS associates the first digital file with the first user-generated tag.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

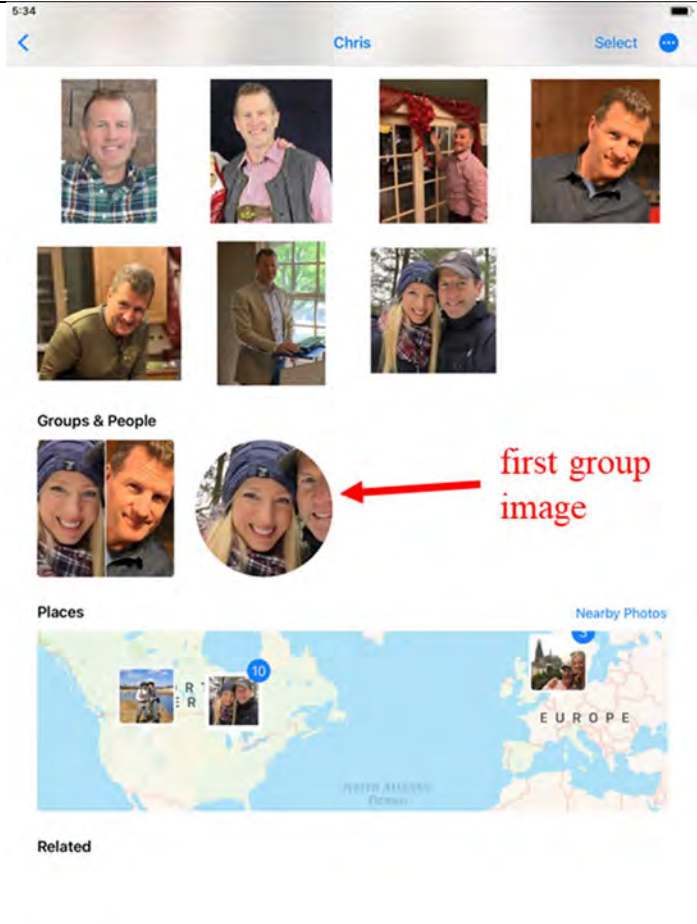
	 <p>The screenshot shows the 'Metadata' page for a photo on an iPad. The photo is titled '459029F4-D9FE-...B28F' and is 2 MB in size. The metadata includes various camera settings such as 'Kind: JPEG image', 'Size: 2 MB', 'Created: April 16, 2021 at 2:04 AM', 'Modified: April 16, 2021 at 2:04 AM', 'Last opened: September 22, 2021 at 11:05 AM', 'Where: On My iPad - Metadata', 'Dimensions: 3,024 x 4,032', 'Resolution: 72 x 72', 'Device make: Apple', 'Device model: iPhone XR', 'Lens model: iPhone XR back camera 4.25mm f/1.8', 'Aperture value: 1.696', 'Exposure time: 1/60', 'Exposure program: Normal', 'Focal length: 4.3 mm', 'ISO speed: 80', 'Flash: NO', 'Red eye: NO', 'F Number: f/1.8', 'Metering mode: Pattern', 'White balance: Auto', 'Content Creator: 13.6', 'Longitude: 87° 39' 42.144" W', and 'Latitude: 41° 55' 44.653" N'. At the bottom, the 'Tags' section is highlighted with a red box and contains the text 'Chris Text Tag'.</p>
<p>9. The method of claim 8, wherein the first user-generated tag includes the name of the first person.</p>	<p>The first user-generated tag can include the name of the first person.</p>

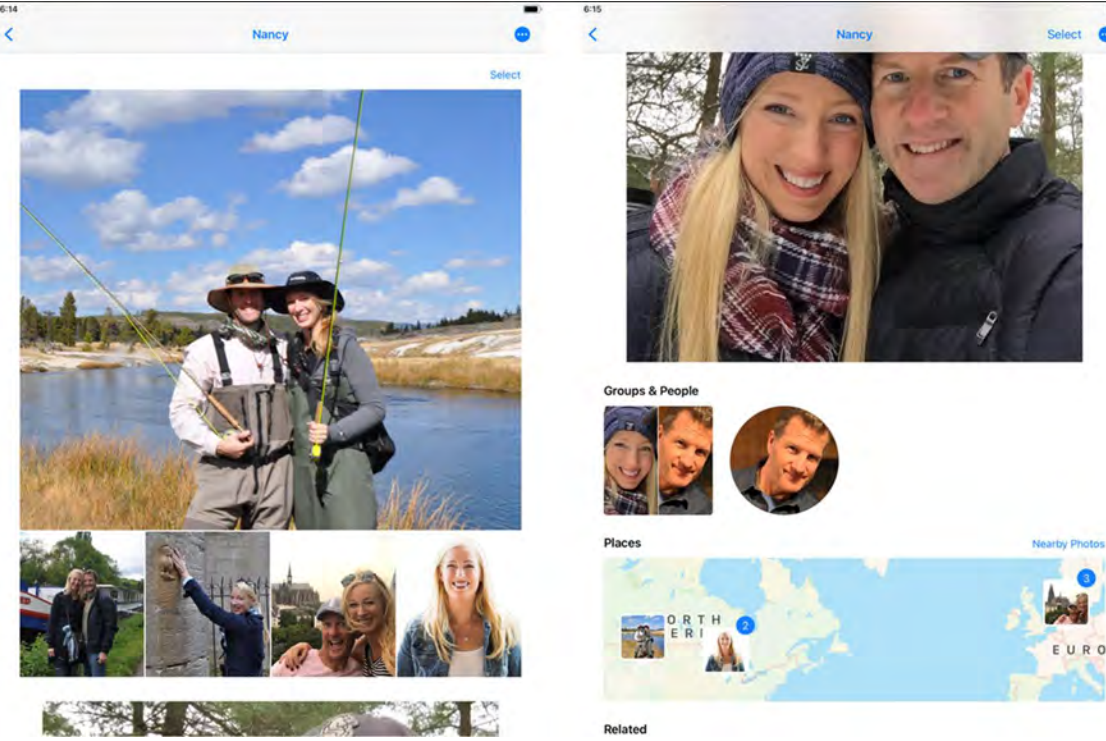


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	 <p>This is also true when tagging digital files after Photos recognizes faces.</p>
<p><b>10.</b> The method of claim 9, further comprising exporting the first digital file to a remote device, the</p>	<p>iPadOS exports the first digital file to a remote device, and the exported first digital file includes information associated with the first user-generated tag. For example, iOS can export the first digital file to a remote device such as an Apple MacBook (e.g., via AirDrop). Information associated with the first user-generated tag is exported to the MacBook, as shown below.</p>

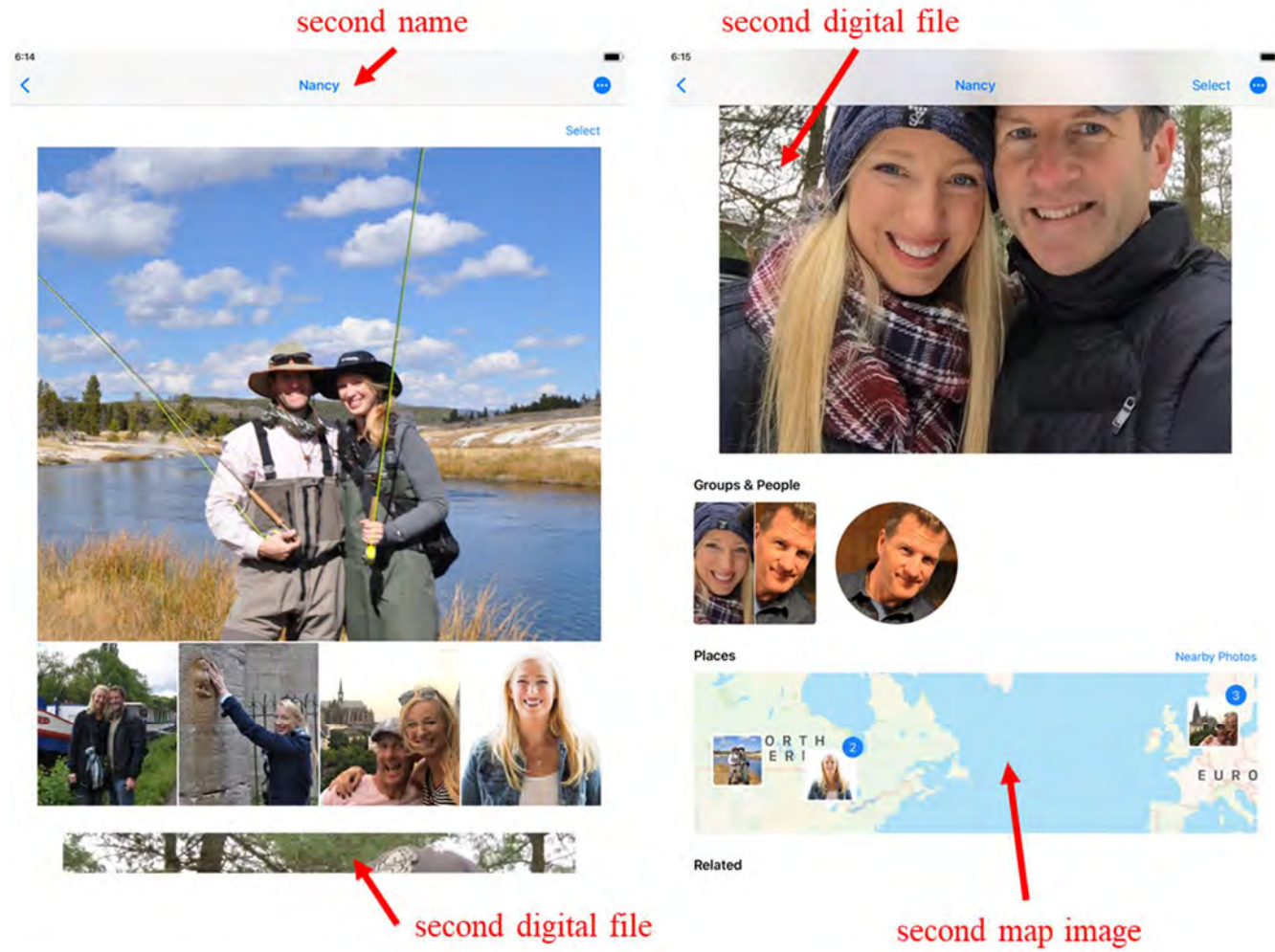
<p>exported first digital file including information associated with the first user-generated tag.</p>	
<p><b>11[pre]</b> The method of claim 1, wherein</p>	<p><i>See information for claim 1.</i></p>
<p><b>11[a]</b> the first person view includes a first group image, and</p>	<p>The first person view includes a first group image.</p>

	 <p>The screenshot shows an iPadOS photo gallery for a contact named "Chris". At the top, there is a status bar with the time "5:34", a back arrow, the name "Chris", and a "Select" button with a three-dot menu. Below the header is a grid of individual photos. Underneath is a section titled "Groups &amp; People" which contains two group photos; the first one is highlighted with a red circle and a red arrow pointing to it from the text "first group image". Below that is a "Places" section featuring a map of North America and Europe with photo thumbnails and a "Nearby Photos" label. At the bottom is a "Related" section.</p>
<p><b>11[b]</b> responsive to an input that is indicative of a selection of the first group image, causing a first group view to be displayed on the</p>	<p>Responsive to an input that is indicative of a selection of the first group image (e.g., tapping the first group image), iPadOS causes a first group view to be displayed on the interface, the first group view including one or more digital files associated with another person that is associated with the first person.</p>

<p>interface, the first group view including one or more digital files associated with another person that is associated with the first person.</p>	
<p><b>12.</b> The method of claim 11, wherein the another person is the second person.</p>	<p>The another person is the second person. <i>See</i> information for limitations 1[a][iii]-[iv] and claim 11.</p>
<p><b>13.</b> The method of claim 3, further comprising responsive to an input that is</p>	<p>Responsive to an input that is indicative of a selection associated with the second person, iPadOS causes a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.</p>

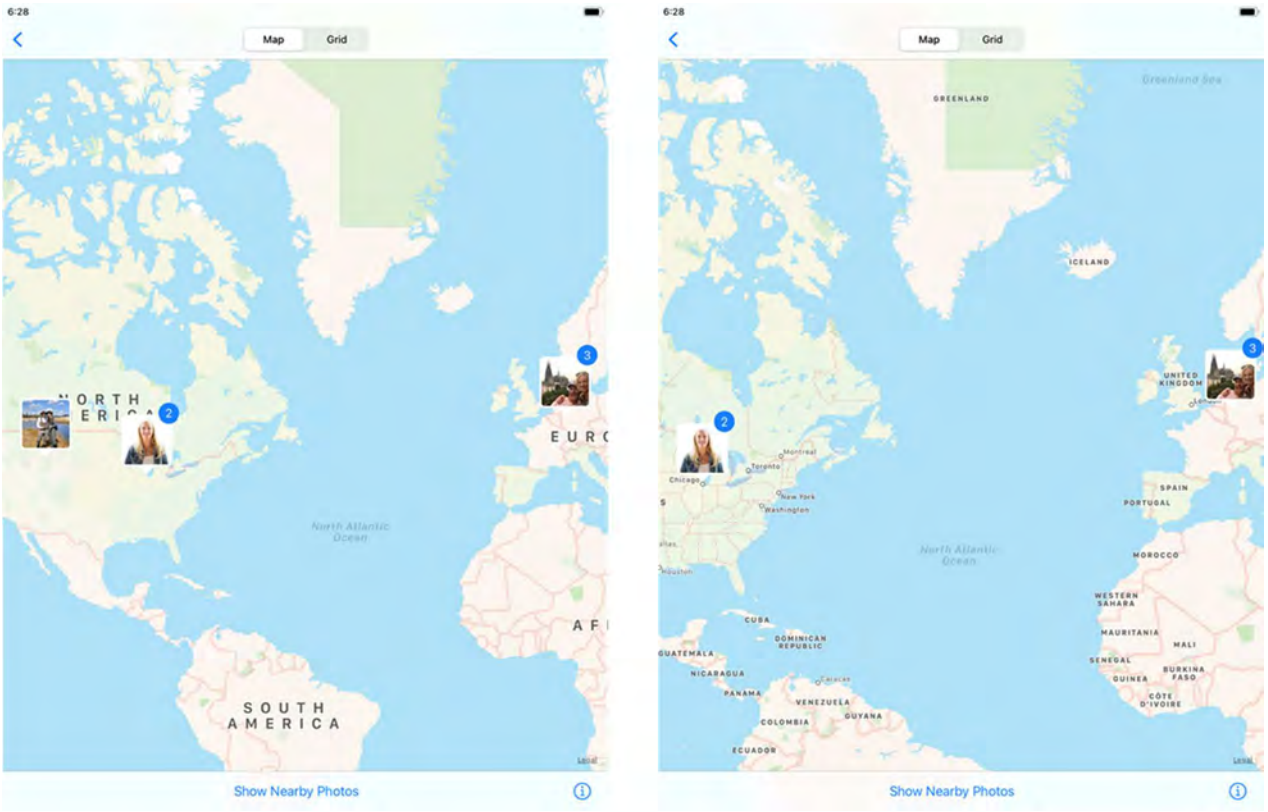


indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.




**14[pre]** The method of claim 13, further comprising:

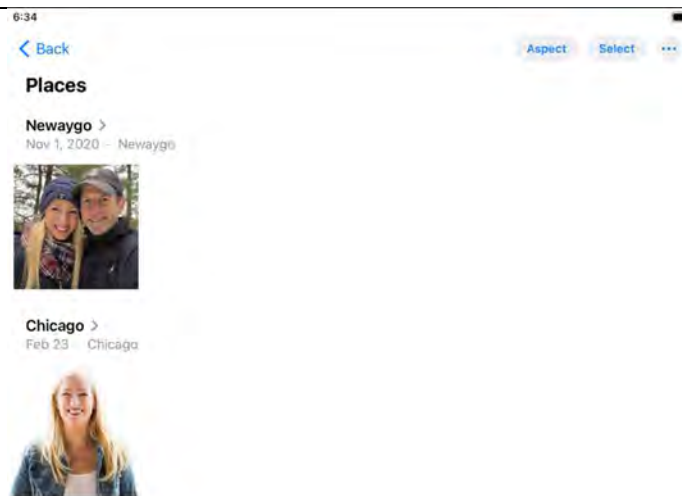
See information for claim 13.

<p><b>14[a]</b> responsive to an input that is indicative of a selection of the second map image in the second person view, causing a second location view to be displayed on the interface,</p>	<p>Responsive to an input that is indicative of a selection of the second map image in the second person view (e.g., tapping the second map image), iPadOS causes a second location view to be displayed on the interface.</p> 
<p><b>14[b]</b> the second location view including: the interactive geographic map,</p>	<p>The second location view includes the interactive geographic map, a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.</p>



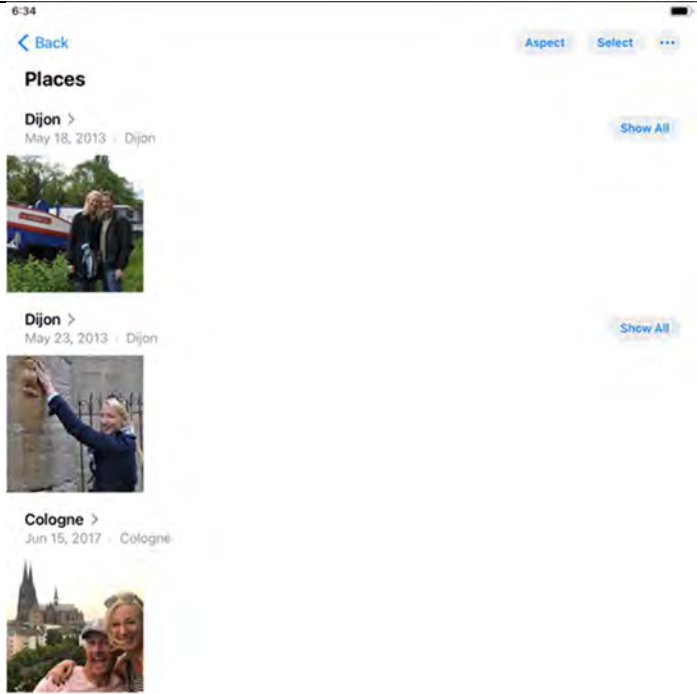
<p>a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.</p>	
<p><b>15.</b> The method of claim 14, wherein the third indication is associated with a third set of digital files and the third location, and the fourth indication is associated with a fourth set of</p>	<p>The third indication is associated with a third set of digital files and the third location. For example, iPadOS displays the view below responsive to tapping the third indication.</p>

digital files and the fourth location.



The fourth indication is associated with a fourth set of digital files and the fourth location. For example, iPadOS displays the view below responsive to tapping the fourth indication.

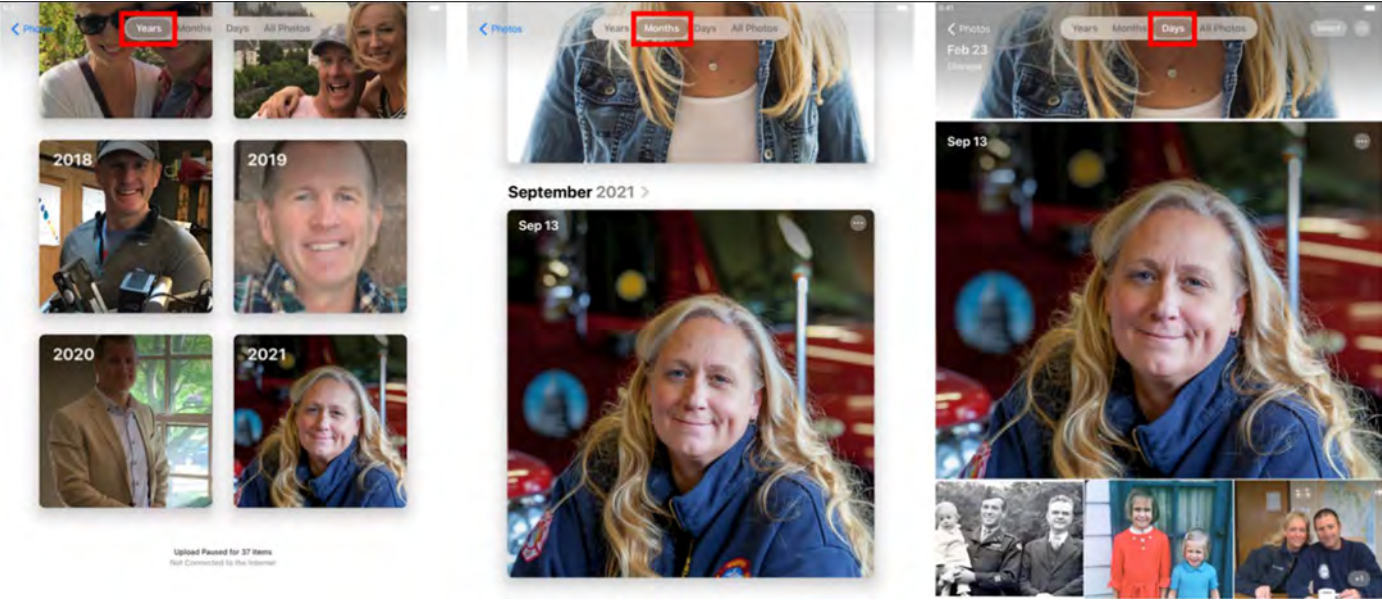
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS


	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button and options for 'Aspect', 'Select', and a menu icon. The gallery is titled 'Places' and contains three entries:</p> <ul style="list-style-type: none"> <li><b>Dijon</b> &gt; (May 18, 2013 - Dijon): A photo of two people standing in front of a red and white striped structure.</li> <li><b>Dijon</b> &gt; (May 23, 2013 - Dijon): A photo of a person pointing at a stone wall.</li> <li><b>Cologne</b> &gt; (Jun 15, 2017 - Cologne): A photo of two people in front of a church.</li> </ul> <p>Each entry has a 'Show All' button to its right.</p>
<p><b>16.</b> The method of claim 15, wherein the third set of digital files and the fourth set of digital files are associated with the second person.</p>	<p>The third set of digital files and the fourth set of digital files are associated with the second person. As shown each below, each of the digital files includes a photograph of the second person.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	 <p>The image shows two side-by-side screenshots of the iPadOS Photos app. Both screenshots are taken at 6:34. The left screenshot shows a 'Places' view with three entries: 'Dijon &gt;' (May 18, 2013), 'Dijon &gt;' (May 23, 2013), and 'Cologne &gt;' (Jun 15, 2017). Each entry has a small photo thumbnail. The right screenshot shows a 'Places' view with three entries: 'Newaygo &gt;' (Nov 1, 2020), 'Chicago &gt;' (Feb 23 - Chicago), and another 'Chicago &gt;' entry. Each entry has a small photo thumbnail. Both screenshots have a 'Back' button at the top left and 'Aspect', 'Select', and a menu icon at the top right.</p>
<p><b>17.</b> The method of claim 1, further comprising causing the interface to display an interactive timeline view, the interactive timeline view permitting a user to group a plurality of digital</p>	<p>iPadOS causes the interface to display an interactive timeline view, the interactive timeline view permitting a user to group a plurality of digital files by year, month, and day.</p>

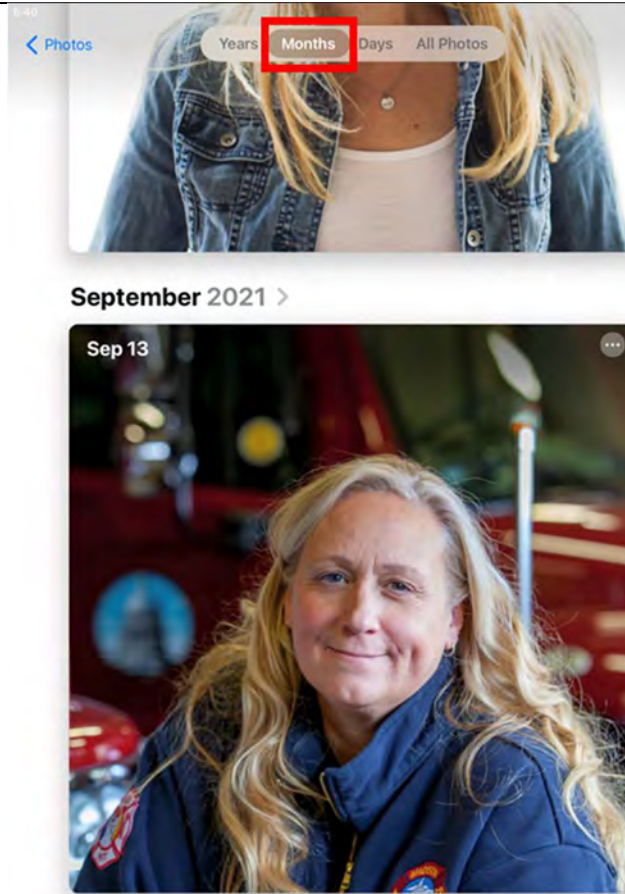
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p>files by year, month, and day.</p>	
<p><b>18[pre]</b> The method of claim 17, further comprising:</p>	<p>See information for claim 17.</p>
<p><b>18[a]</b> responsive to receiving a year input, grouping the plurality of digital files based on year and causing at least one of the plurality of digital files to be</p>	<p>Responsive to receiving a year input (e.g., tapping the “Years” element), iPadOS groups the plurality of digital files based on year and causes at least one of the plurality of digital files to be displayed on the interface.</p>

<p>displayed on the interface;</p>	 <p>The screenshot shows the iPadOS Photos app interface. At the top, there are navigation options: '&lt; Photos', 'Years' (highlighted with a red box), 'Months', 'Days', and 'All Photos'. Below the navigation bar, there are two rows of photo thumbnails. The first row shows two photos of people. The second row shows two photos of a man, with the year '2018' overlaid on the left one and '2019' overlaid on the right one. The third row shows two photos of a man, with the year '2020' overlaid on the left one and '2021' overlaid on the right one.</p>
<p><b>18[b]</b> responsive to receiving a month input, grouping the plurality of digital files based on month and causing at least one of the plurality of digital files to be</p>	<p>Responsive to receiving a month input (e.g., tapping the “Months” element), iPadOS groups the plurality of digital files based on month and causes at least one of the plurality of digital files to be displayed on the interface.</p>

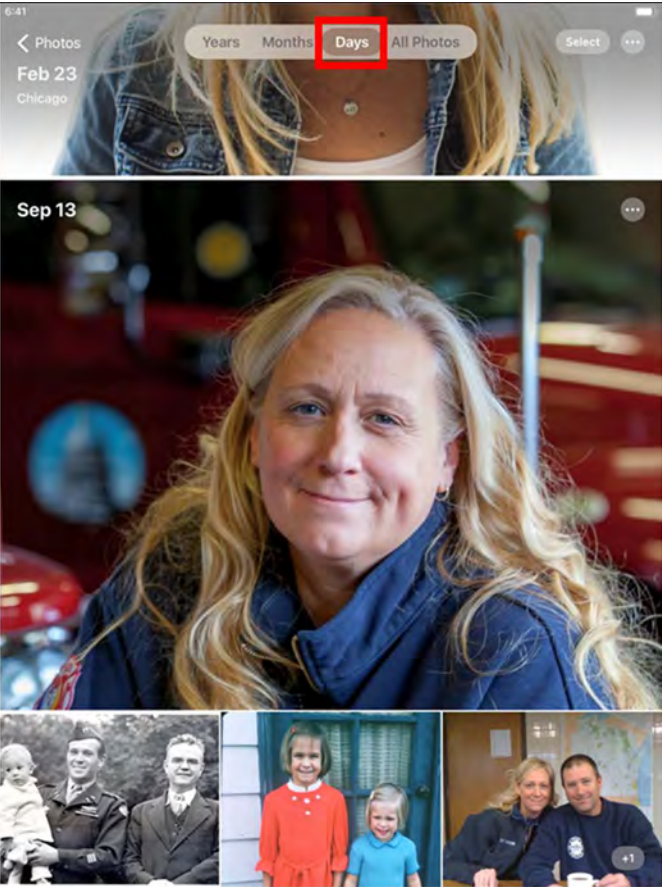


displayed on the interface; and

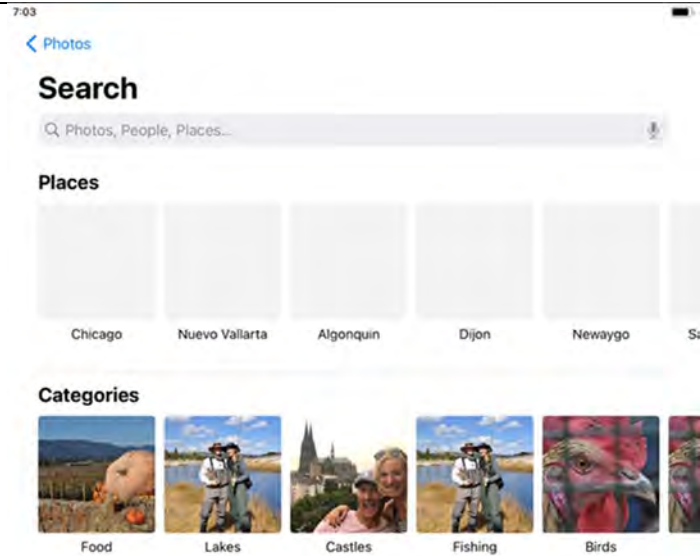


**18[c]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital

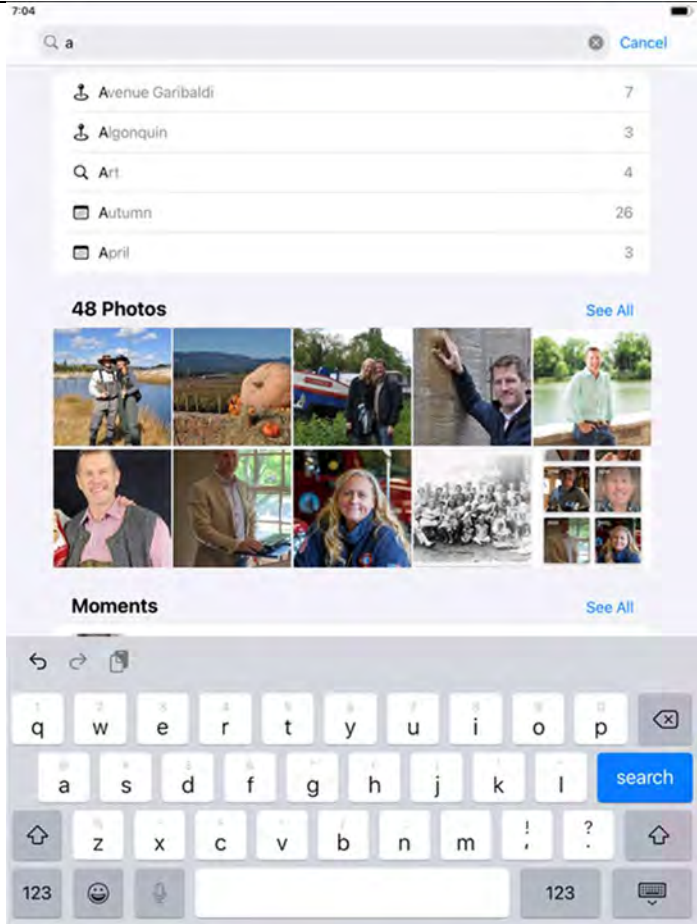
Responsive to receiving a day input (e.g., tapping the “Days” element), iPadOS groups the plurality of digital files based on day and causes at least one of the plurality of digital files to be displayed on the interface.


<p>files to be displayed on the interface.</p>	
<p><b>19.</b> The method of claim 1, further comprising receiving one or more filtering criteria and causing one or</p>	<p>iPadOS receives one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, iPadOS provides filtering criteria based on places (e.g., Chicago) and categories (e.g., food, castles, fishing, birds, animals, etc.).</p>

more digital files to be displayed on the interface based at least in part on the one or more filtering criteria.



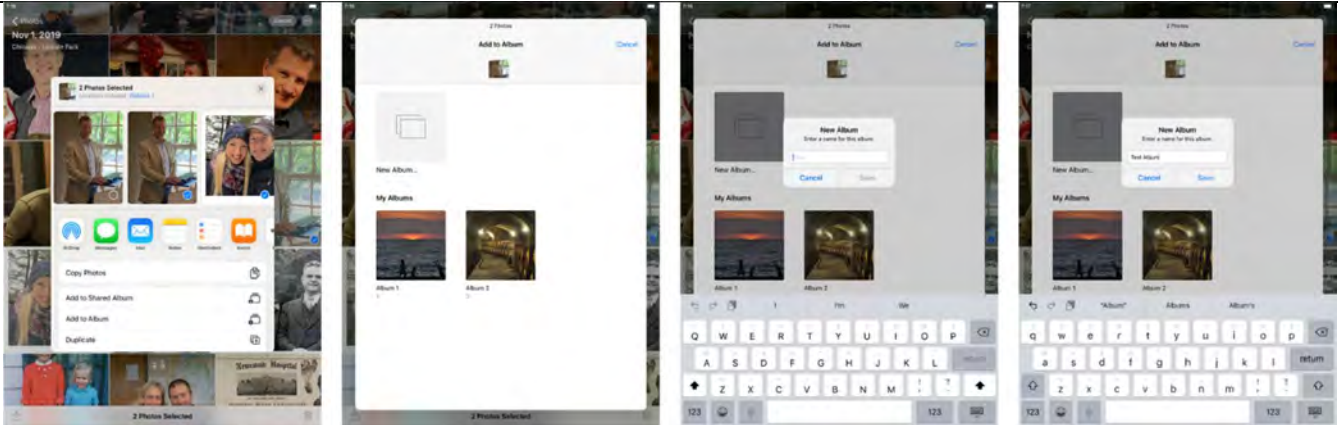
Further, iPadOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing the letter “a” as a filtering criterion causes digital files to be displayed based on locations or months starting with the letter “a.”

	 <p>The screenshot shows the iPadOS search interface with the letter 'a' entered. The results are categorized into locations (Avenue Garibaldi with 7 results, Algonquin with 3), categories (Art with 4, Autumn with 26, April with 3), 48 photos, and Moments. A keyboard is visible at the bottom.</p> <p>The filtering criteria discussed above are exemplary: iPadOS may receive many different filtering criteria.</p>
<p><b>20[pre]</b> The method of claim 19, further comprising:</p>	<p>See information for claim 19.</p>

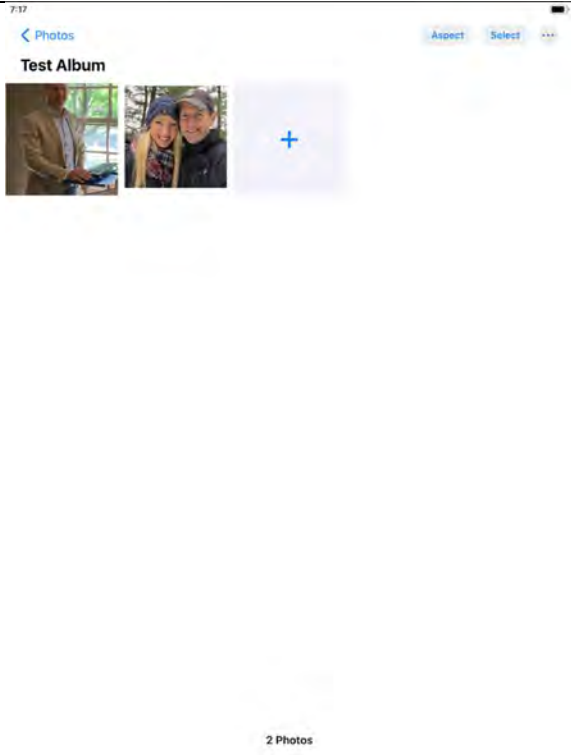
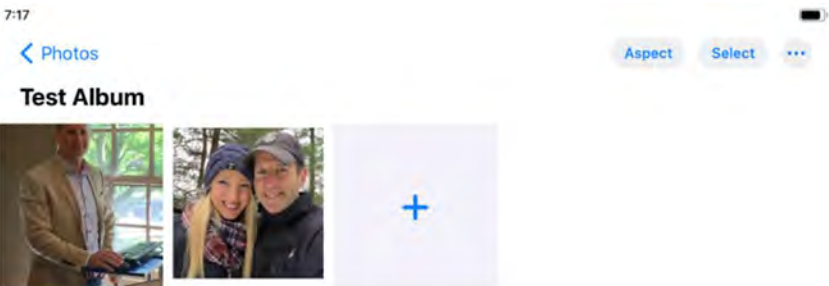
<p><b>20[a]</b> causing a plurality of images to be displayed on the interface;</p>	<p>iPadOS causes a plurality of images to be displayed on the interface.</p> 
<p><b>20[b]</b> receiving alphanumeric text as the album name;</p>	<p>iPadOS receives alphanumeric text as the album name. For example, iPadOS displays an “Add to Album” option responsive to a selection of the plurality of images. iPadOS then displays a “New Album” option and a prompt to enter alphanumeric text as the album name.</p>

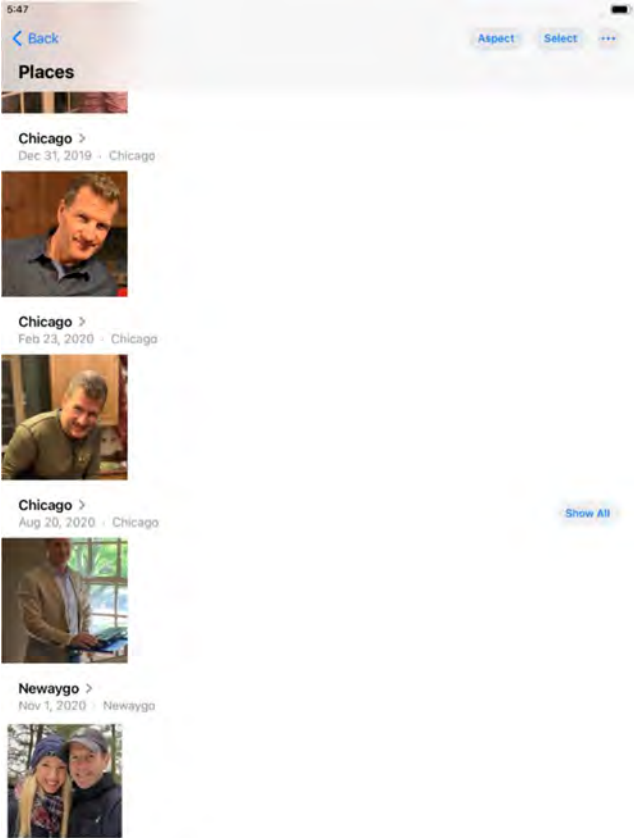


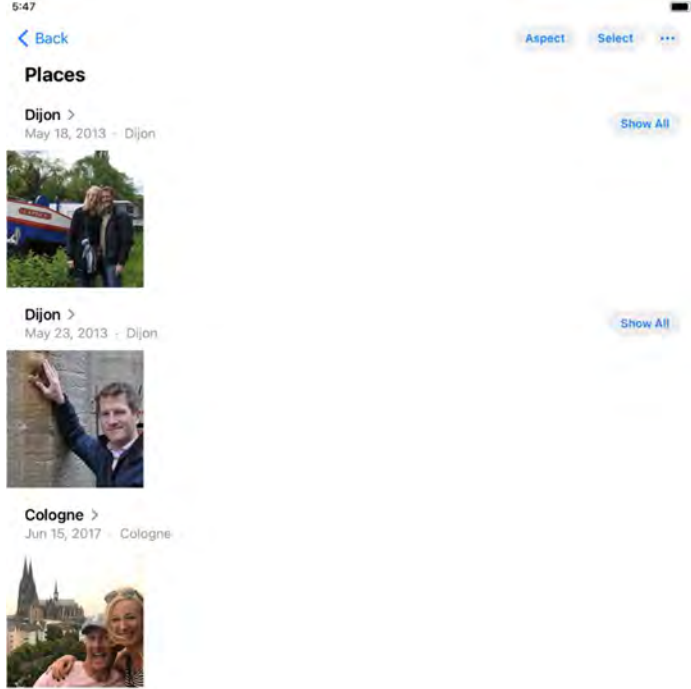
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	
<p>20[c] causing each of the plurality of images to be associated with an album name; and</p>	<p>iPadOS causes each of the plurality of images to be associated with an album name. For example, as shown below, each of the plurality of images are displayed with the album name.</p>



	 <p>A screenshot of the iPadOS Photos app interface. At the top, it shows the time '7:17', a back arrow, and the word 'Photos'. Below that is the album name 'Test Album'. The main area displays two photo thumbnails: one of a man in a suit and one of a couple. To the right of these thumbnails is a large, light blue square with a white plus sign. At the bottom center, it says '2 Photos'. In the top right corner, there are buttons for 'Aspect', 'Select', and a three-dot menu icon.</p>
<p><b>20[d]</b> causing an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>	<p>iPadOS causes an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>  <p>A second screenshot of the iPadOS Photos app interface, identical to the one above. It shows the time '7:17', a back arrow, and the word 'Photos'. Below that is the album name 'Test Album'. The main area displays two photo thumbnails: one of a man in a suit and one of a couple. To the right of these thumbnails is a large, light blue square with a white plus sign. At the bottom center, it says '2 Photos'. In the top right corner, there are buttons for 'Aspect', 'Select', and a three-dot menu icon.</p>

<p><b>21[pre]</b> The method of claim 2, further comprising</p>	<p>See information for claim 2.</p>
<p><b>21[a]</b> responsive to a selection associated with the first location, causing the first set of digital files to be displayed on the interface and</p>	<p>Responsive to a selection associated with the first location (e.g., responsive to a touch/tap of the first indication in the first location view) causing the first set of digital files to be displayed on the interface.</p> 

<p><b>21[b]</b> responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.</p>	<p>Responsive to a selection associated with the second location (e.g., responsive to a touch/tap of the second indication in the first location view) causing the first set of digital files to be displayed on the interface.</p> 
<p><b>22.</b> The method of claim 21, further comprising causing (i) a first number associated with a number of digital files in the first set of digital files to be</p>	<p>The first location view displayed by iPadOS includes (i) a first number associated with a number of digital files in the first set of digital files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files on the interface.</p>

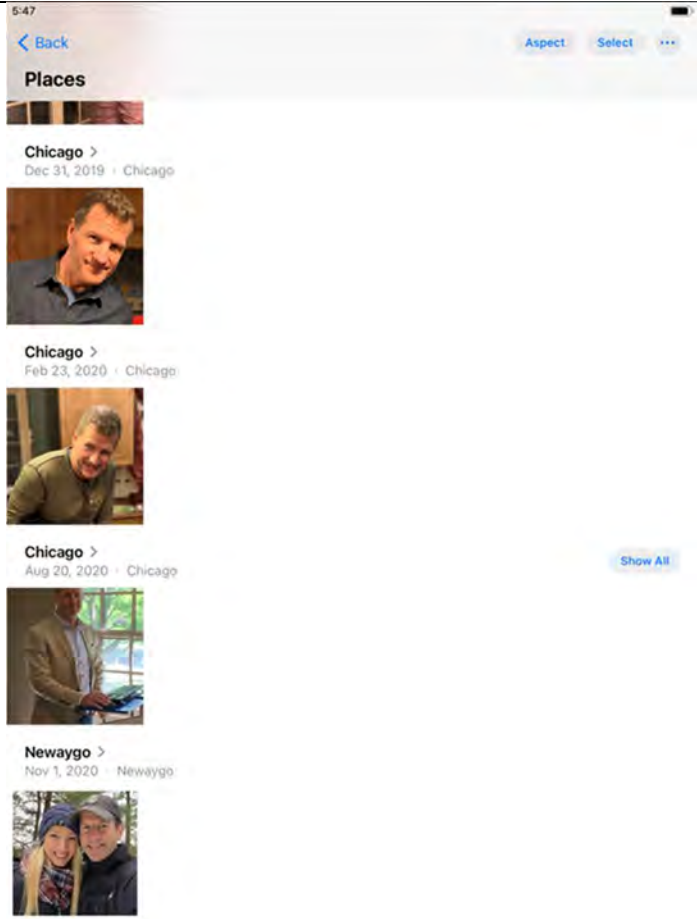
displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.



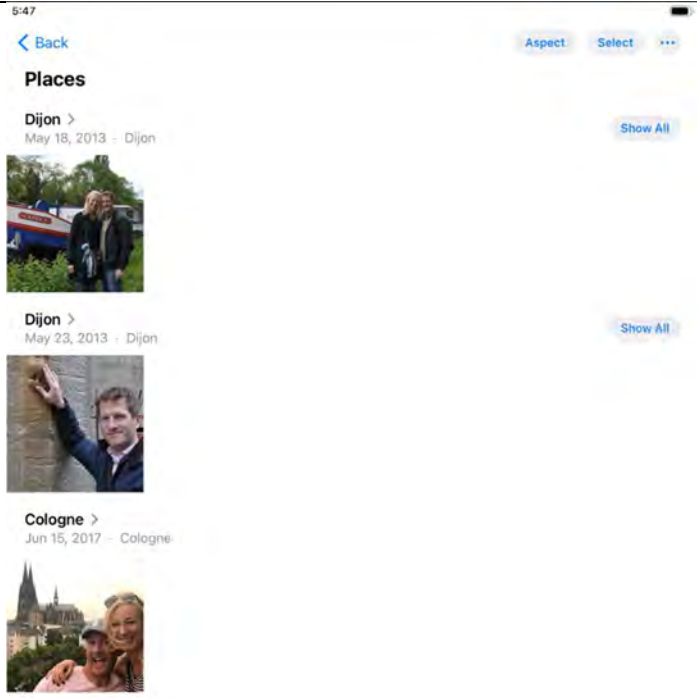
**23.** The method of claim 3, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

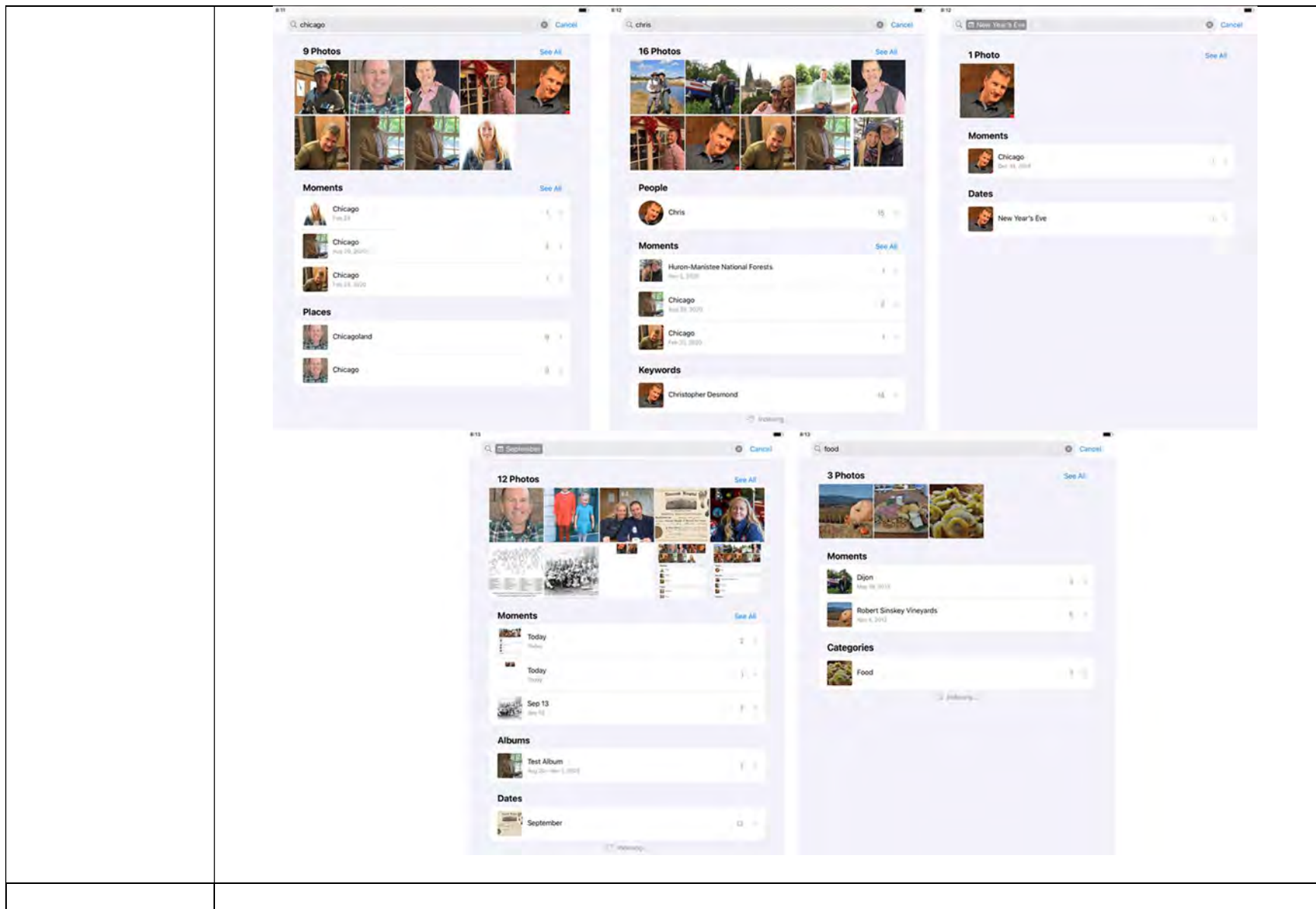
<p>the second set of digital files include a photo, a video, or both.</p>	
<p><b>25[pre].</b> The method of claim 21,</p>	<p>See information for claim 21.</p>
<p><b>25[a].</b> wherein at least one digital file in the first set of digital files</p>	<p>At least one digital file in the first set of digital files displayed on the interface responsive to the selection associated with the first location is not overlaid on the interactive geographic map.</p>

<p>displayed on the interface responsive to the selection associated with the first location is not overlaid on the interactive geographic map and</p>	
<p><b>25[b]</b> at least one digital file in the second set of digital files displayed on the interface responsive to the</p>	<p>At least one digital file in the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>



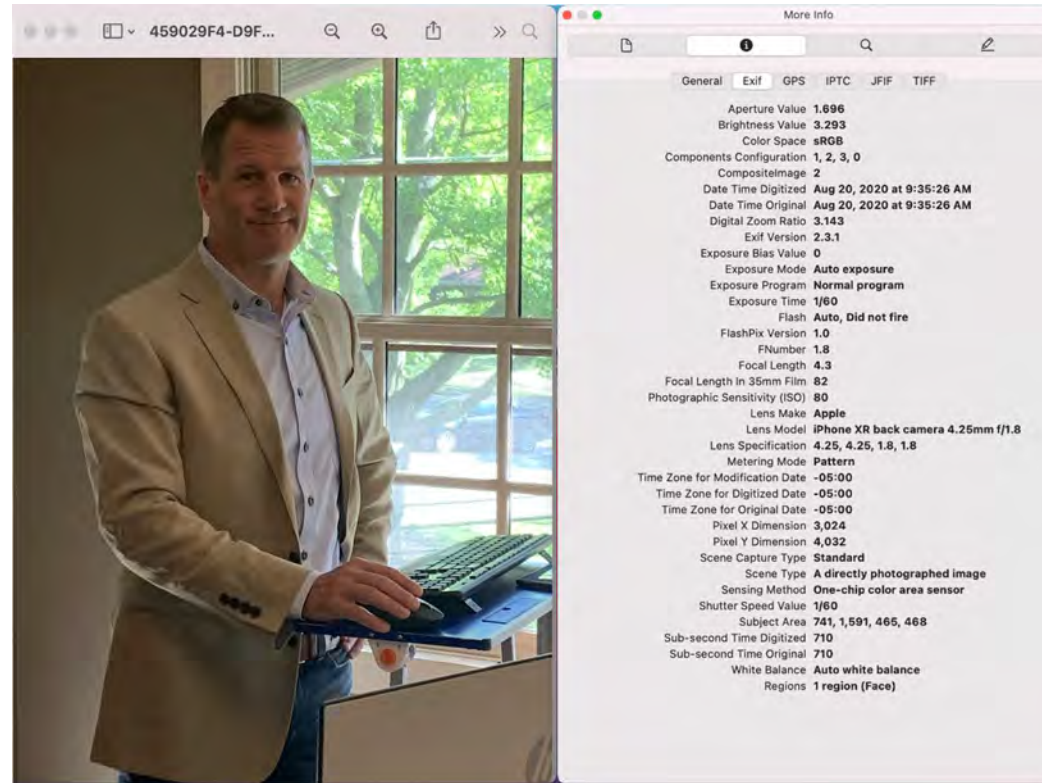
<p>selection associated with the second location are not overlaid on the interactive geographic map.</p>	 <p>The screenshot shows an iPadOS interface with a 'Places' section. At the top, there are navigation options: '&lt; Back', 'Aspect', 'Select', and a three-dot menu. Below this, the 'Places' section lists three entries:</p> <ul style="list-style-type: none"> <li><b>Dijon &gt;</b> May 18, 2013 · Dijon A photo of two people standing outdoors.</li> <li><b>Dijon &gt;</b> May 23, 2013 · Dijon A photo of a man pointing at a stone wall.</li> <li><b>Cologne &gt;</b> Jun 15, 2017 · Cologne A photo of two people in front of a church.</li> </ul> <p>Each entry has a 'Show All' button to its right.</p>
<p><b>26.</b> The method of claim 19, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS



**27.** The method of claim 10, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file.

Exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file. For example, iPadOS can export the first digital file to macOS (e.g., via AirDrop), and the EXIF data associated with the first digital file is visible in macOS.



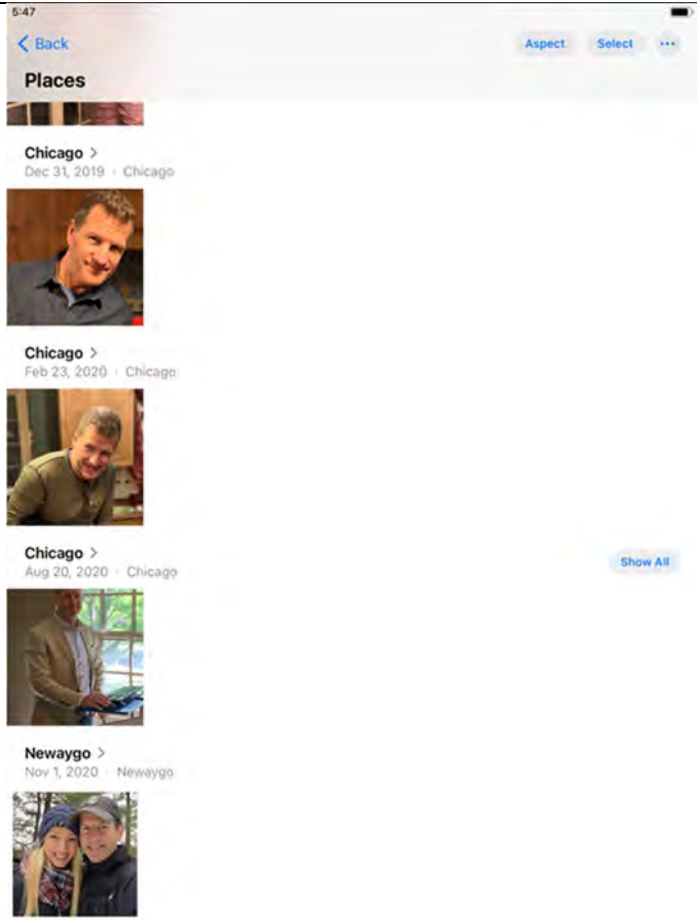
**28.** The method of claim 1, wherein the input that is indicative of the selection of the first person

The input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image associated with the first person. *See* information for limitation 1[b].

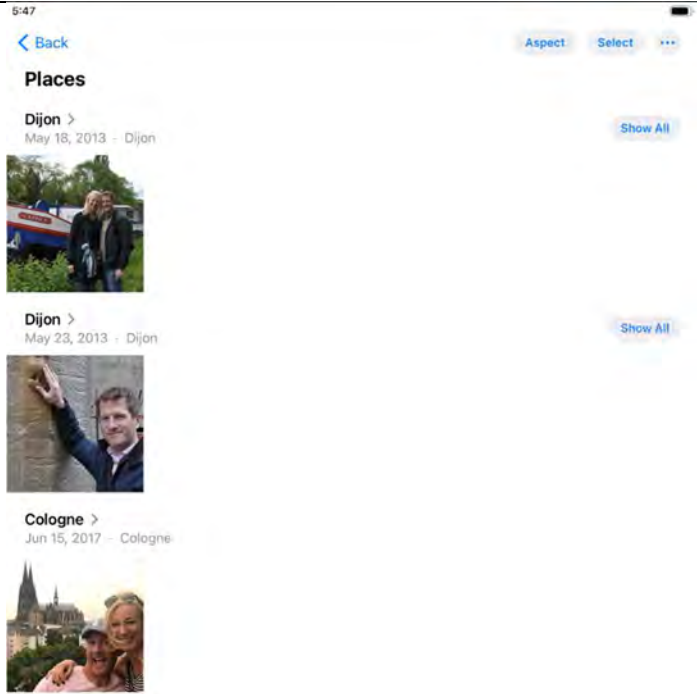
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p>includes a touch or click of the first thumbnail image associated with the first person.</p>	
<p><b>29.</b> The method of claim 1, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.</p>	<p>The input that is indicative of the selection of the first map image is a touch or click of the first map image. <i>See</i> information for limitation 1[c].</p>
<p><b>30[pre].</b> The method of claim 25, wherein</p>	<p><i>See</i> information for claim 25.</p>
<p><b>30[a]</b> The method of claim 25, wherein each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive</p>	<p>Each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map.</p>

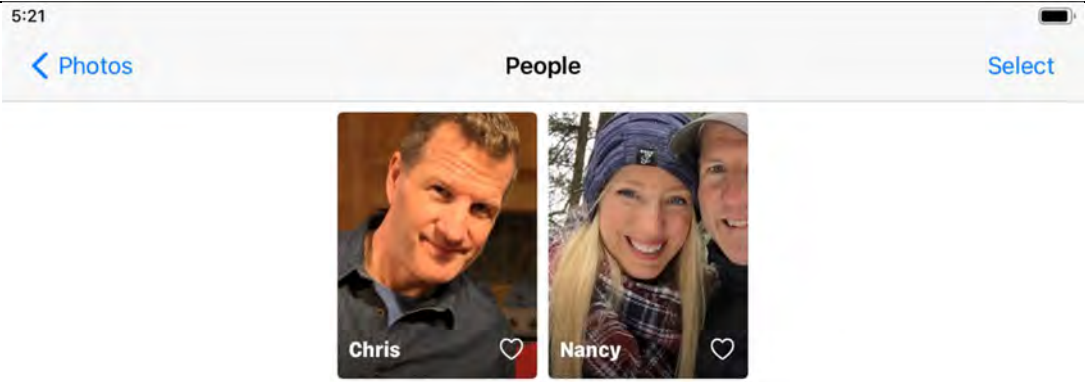
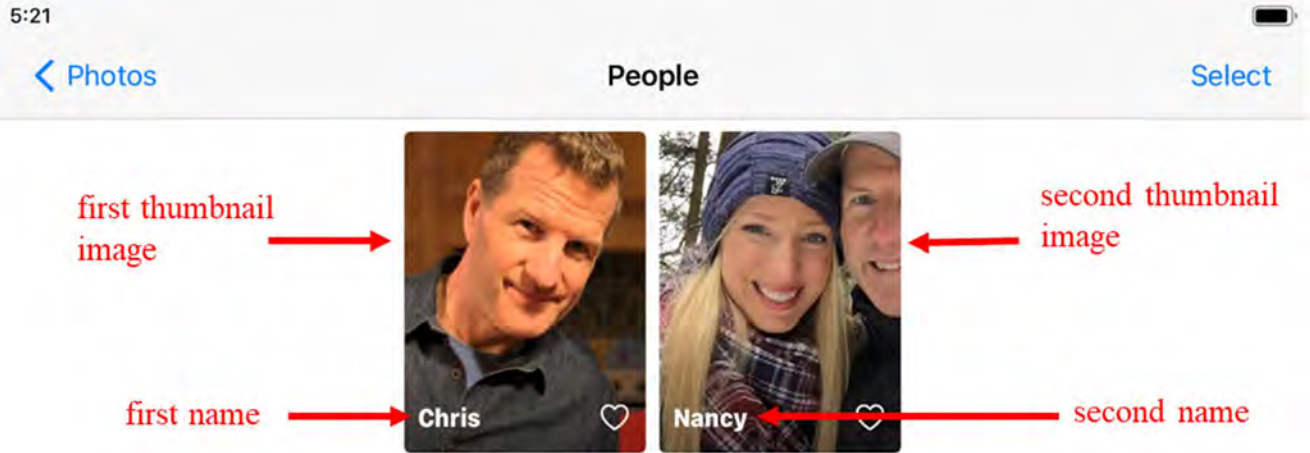
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p>geographic map and</p>	
<p><b>30[b]</b> each of the digital files in the second set of digital files displayed on the interface responsive to the</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>

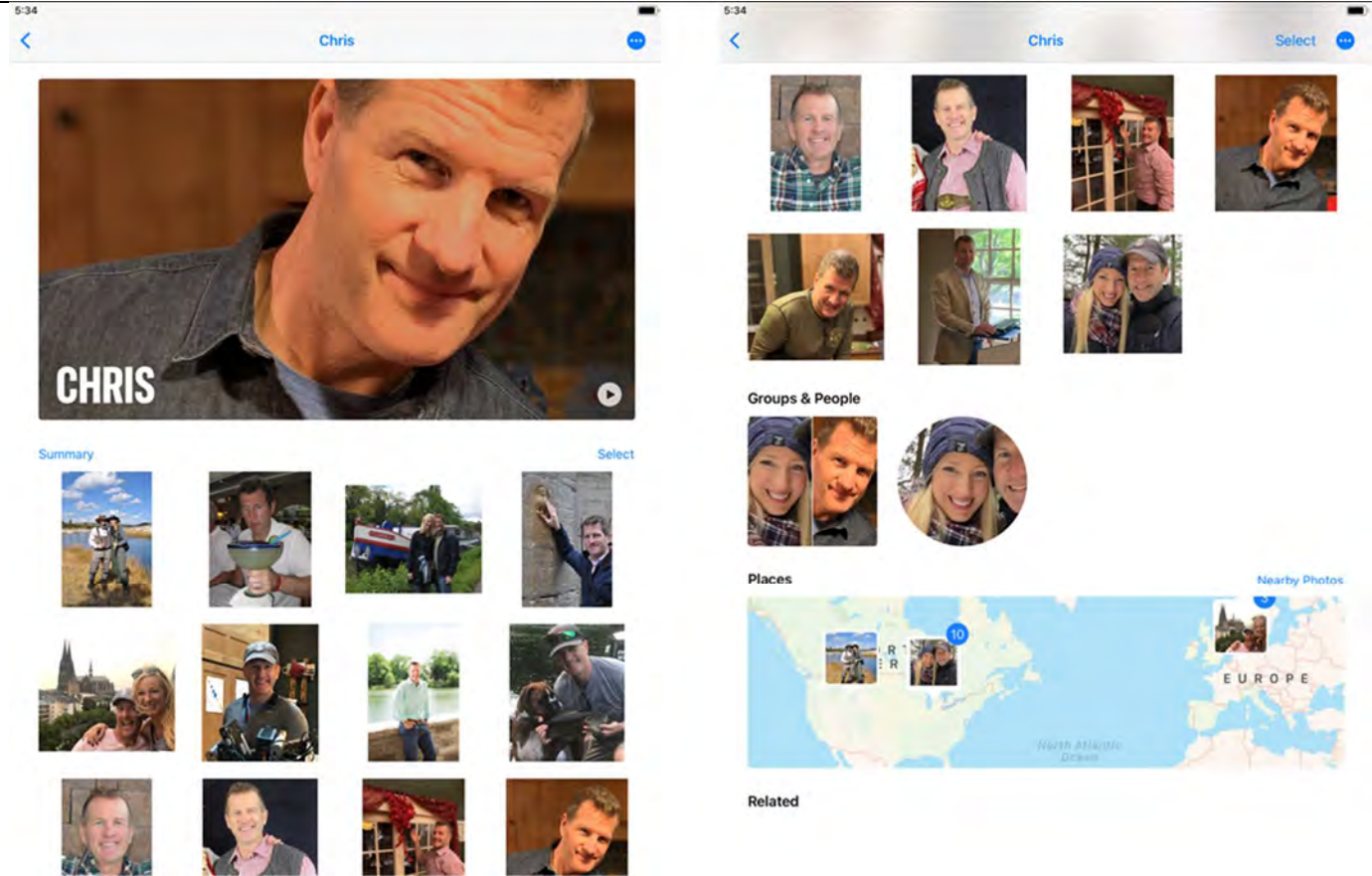
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p>selection associated with the second location are not overlaid on the interactive geographic map.</p>	 <p>The screenshot shows the iPadOS 'Places' interface. At the top, there is a 'Back' button and 'Aspect', 'Select', and a menu icon. Below this is the title 'Places'. The first entry is 'Dijon &gt;' with the date 'May 18, 2013 - Dijon' and a photo of two people. To the right of this entry is a 'Show All' button. The second entry is also 'Dijon &gt;' with the date 'May 23, 2013 - Dijon' and a photo of a man pointing at a wall. To the right of this entry is another 'Show All' button. The third entry is 'Cologne &gt;' with the date 'Jun 15, 2017 - Cologne' and a photo of two people in front of a church.</p>
<p><b>31[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, iPadOS performs a method, as set forth below.</p>
<p><b>31[a]</b> causing an interface to display a people view, the people view including:</p>	<p>iPadOS causes an interface (e.g., Apple iPad) to display a people view.</p>



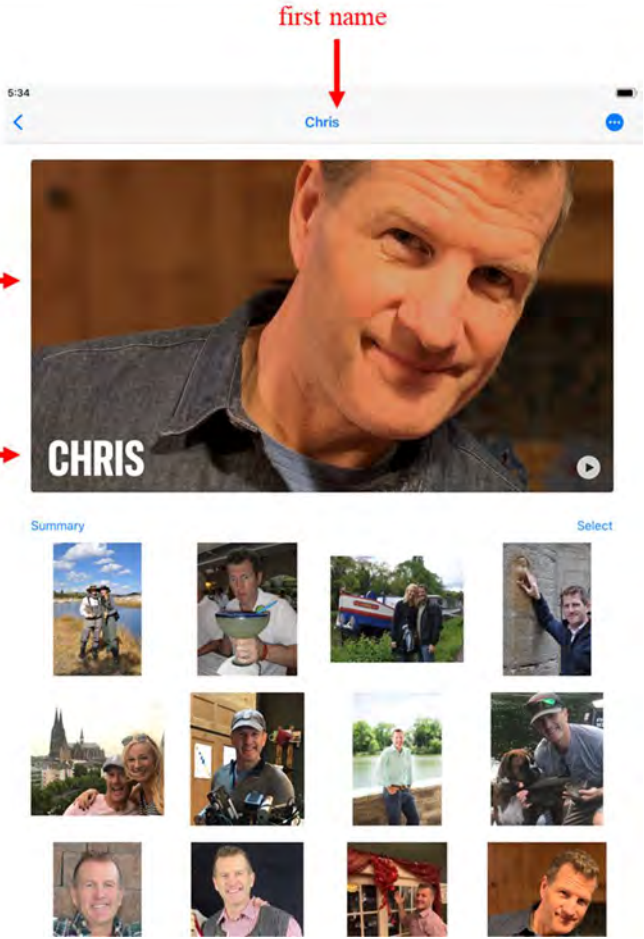
	 <p>The screenshot shows the 'People' view in iPadOS. At the top, there is a status bar with the time '5:21' and a battery icon. Below the status bar is a navigation bar with a back arrow and the word 'Photos' on the left, the word 'People' in the center, and a 'Select' button on the right. The main content area displays two person thumbnails. The first thumbnail is a portrait of a man with short brown hair, wearing a dark blue shirt, with the name 'Chris' and a heart icon below it. The second thumbnail is a photo of a woman with long blonde hair wearing a blue beanie and a plaid scarf, with a man's face partially visible behind her, with the name 'Nancy' and a heart icon below it.</p>
<p><b>31[a][i]</b> a first thumbnail image associated with a first person,  <b>31[a][ii]</b> a first name associated with the first person, <b>31[a][iii]</b> a second thumbnail image associated with a second person, and <b>31[a][iv]</b> a second name associated with the second person;</p>	<p>The people view includes (1) a first thumbnail image associated with a first person, (2) a first name associated with the first person, (3) a second thumbnail image associated with a second person, and (4) a second name associated with the second person.</p>  <p>The annotated screenshot is identical to the one above but includes red arrows and text labels. A red arrow points from the text 'first thumbnail image' to the left side of the Chris thumbnail. Another red arrow points from the text 'second thumbnail image' to the right side of the Nancy thumbnail. A red arrow points from the text 'first name' to the name 'Chris' below the first thumbnail. A final red arrow points from the text 'second name' to the name 'Nancy' below the second thumbnail.</p>
<p><b>31[b]</b> responsive to an input that is indicative of a</p>	<p>Responsive to an input that is indicative of a selection associated with the first person (e.g., tapping the first thumbnail image in the people view), iPadOS causes a first person view to be displayed on the interface.</p>

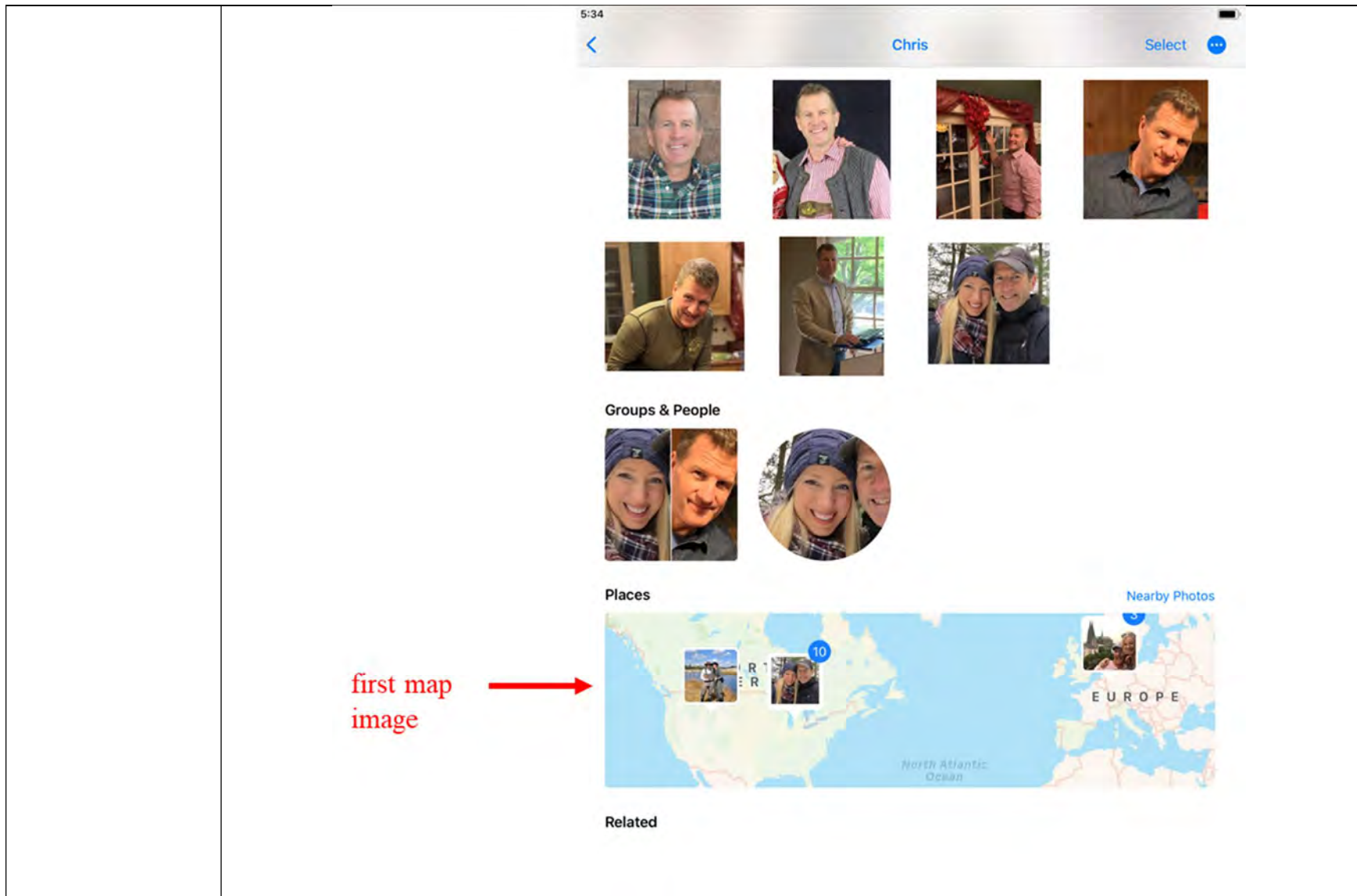
selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:



**31(b)(i)** a first digital file associated with the first person, **31(b)(ii)** the first name associated with the first person, and

The first person view includes a first digital file associated with the first person and the first name associated with the first person.

	 <p>The screenshot shows a contact card for 'Chris' on an iPadOS interface. At the top, the name 'Chris' is displayed in blue text, with a red arrow pointing to it from the label 'first name' above. Below the name is a large profile picture of a man, with a red arrow pointing to it from the label 'first digital file' to its left. Underneath the profile picture is a photo gallery titled 'Summary' on the left and 'Select' on the right. The gallery contains 12 small images of the same man in various settings. A red arrow points from the label 'first name' to the text 'CHRIS' overlaid on the bottom left of the profile picture.</p>
<p><b>31[b][iii]</b> a first map image;</p>	<p>The first person view also includes a first map image.</p>



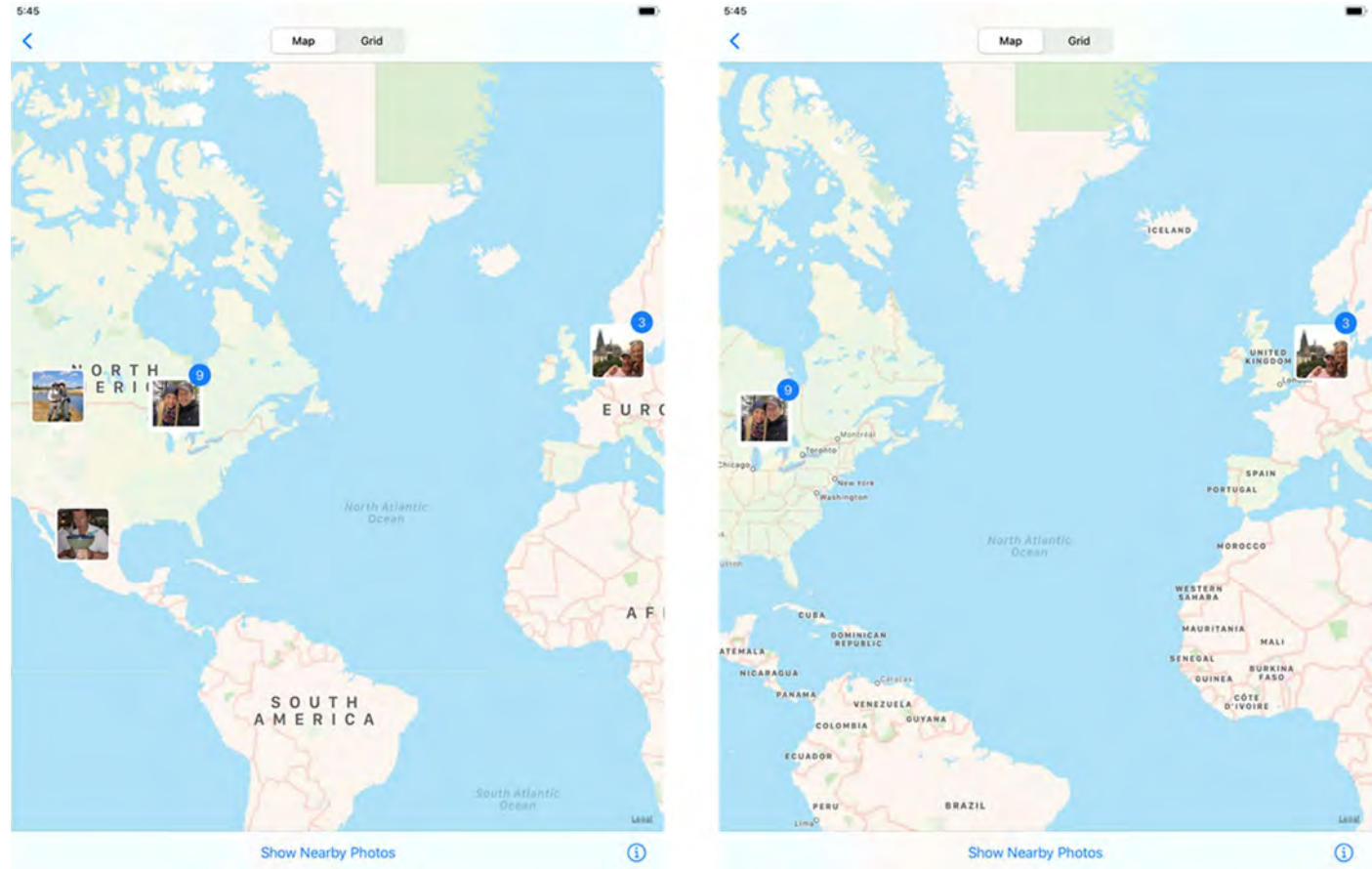
**31[c]** responsive to an input that is

Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), iPadOS causes a first location view to be displayed on the



indicative of a selection of the first map image in the first person view, causing a first location view to be displayed on the interface, the first location view including:

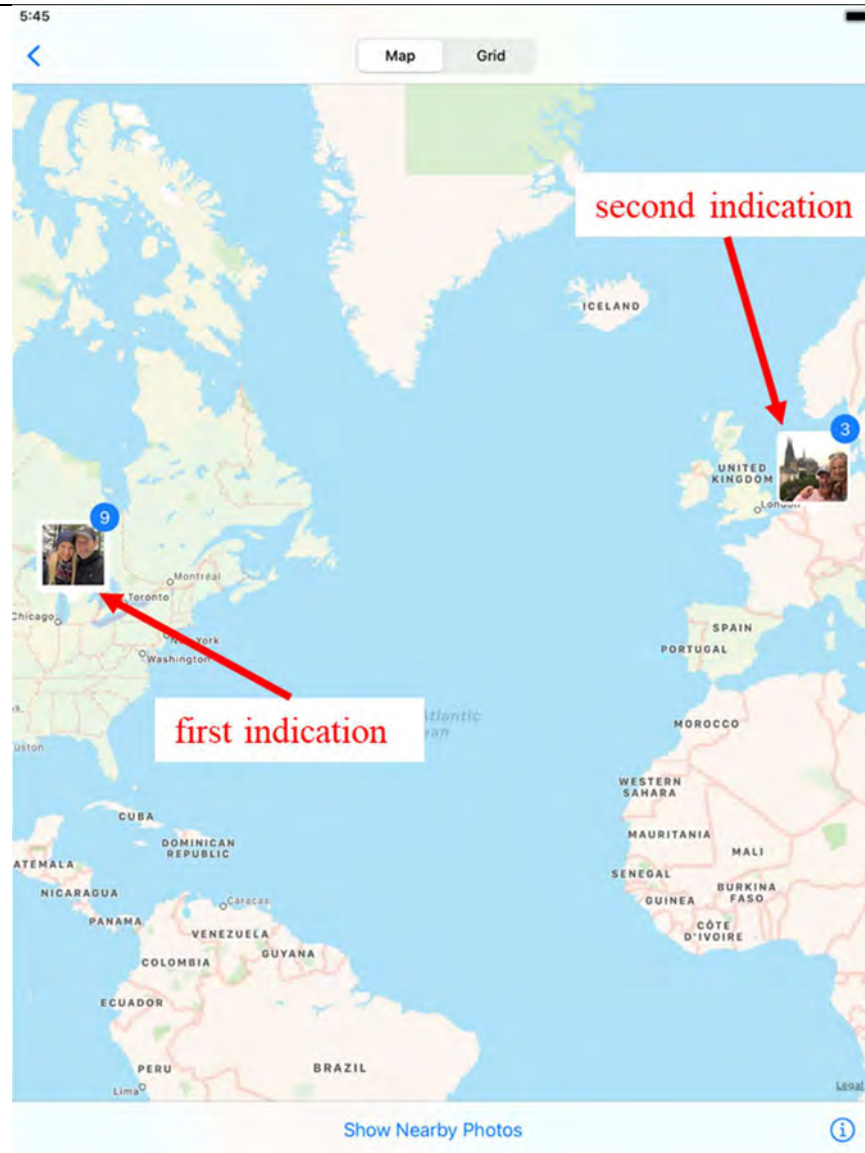
interface. The first location view includes an interactive geographic map. The geographic is interactive in that iPadOS can zoom in or out, or move side to side.



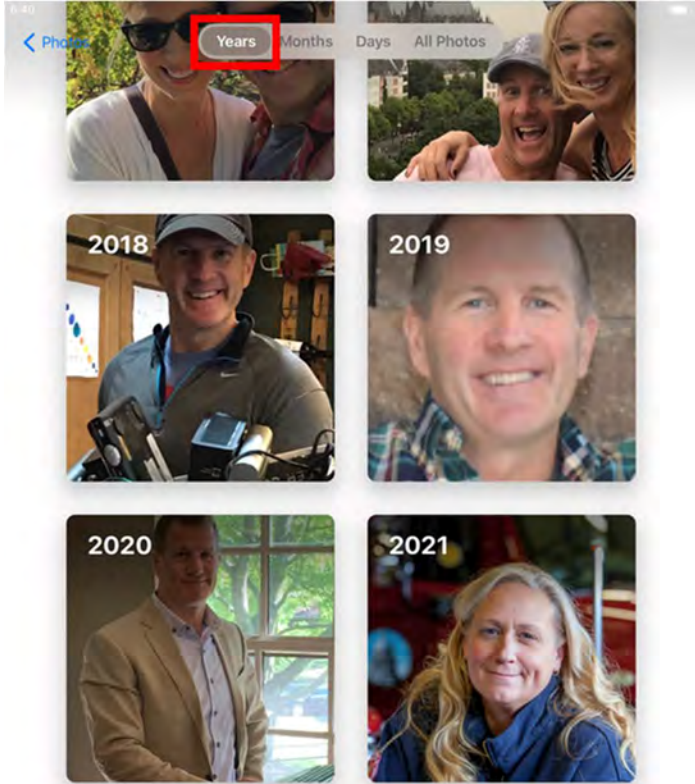
**31[c][i]** an interactive geographic map, **31[c][ii]** a first indication

The first location view includes a first indication positioned at a first location on the interactive geographic map and a second indication positioned at a second location on the interactive geographic map.

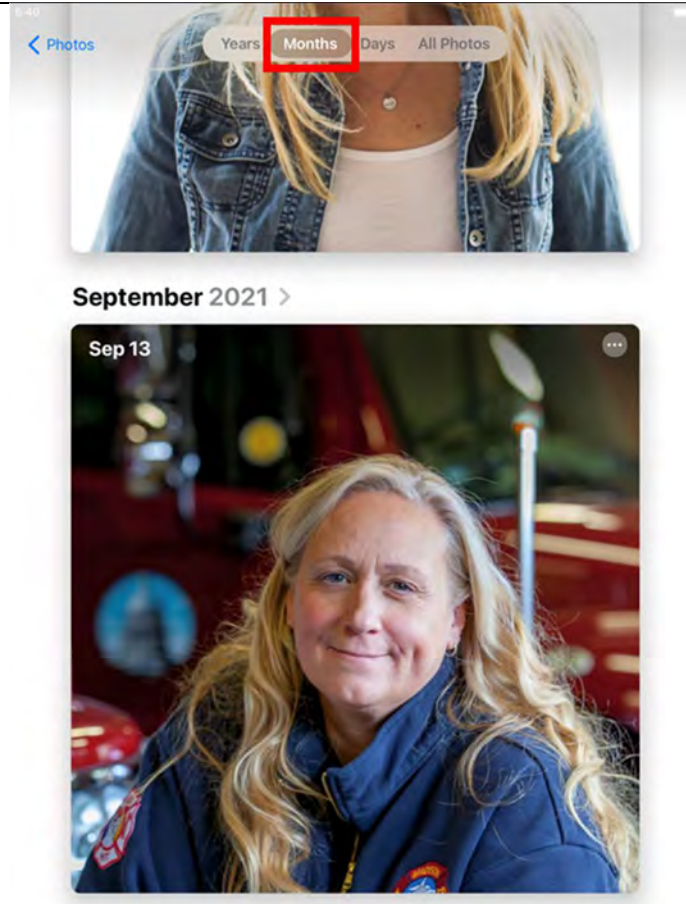
positioned at a first location on the interactive geographic map, and **31(c)(iii)** a second indication positioned at a second location on the interactive geographic map;






<p><b>31[d]</b> responsive to receiving a year input, grouping a plurality of digital files based on year and causing at least one of the plurality of digital files to be displayed on the interface;</p>	<p>Responsive to receiving a year input (e.g., tapping the “Years” element), iPadOS groups the plurality of digital files based on year and causes at least one of the plurality of digital files to be displayed on the interface.</p>  <p>The screenshot shows the iPadOS photo gallery interface. At the top, there is a navigation bar with a back arrow and the word 'Photos'. Below this, there are four tabs: 'Years', 'Months', 'Days', and 'All Photos'. The 'Years' tab is highlighted with a red rectangular box. Below the tabs, a grid of photo thumbnails is displayed, organized by year. The years shown are 2018, 2019, 2020, and 2021. Each year has one or two photo thumbnails. For example, 2018 has two photos of a man in a cap, 2019 has one photo of a man's face, 2020 has one photo of a man in a suit, and 2021 has one photo of a woman with blonde hair.</p>
<p><b>31[e]</b> responsive to receiving a month input, grouping the plurality of digital files based on month and causing at least one of the</p>	<p>Responsive to receiving a month input (e.g., tapping the “Months” element), iPadOS groups the plurality of digital files based on month and causes at least one of the plurality of digital files to be displayed on the interface.</p>

plurality of digital files to be displayed on the interface; and



**31[f]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital

Responsive to receiving a day input (e.g., tapping the “Days” element), iPadOS groups the plurality of digital files based on day and causes at least one of the plurality of digital files to be displayed on the interface.

<p>files to be displayed on the interface.</p>	
<p><b>32.</b> The method of claim 31, wherein the first digital file is included in the plurality of digital files.</p>	<p>The first digital file (<i>see</i> limitation 31[b][i]) is included in the plurality of digital files that are grouped by year, month, or day.</p>

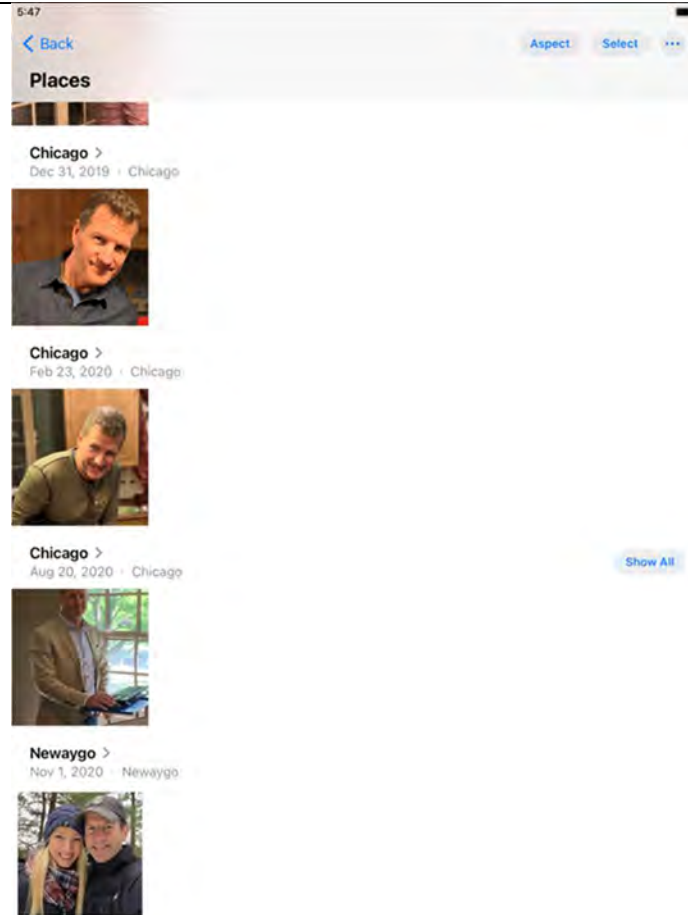
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p><b>33.</b> The method of claim 31, further comprising causing the interface to display an interactive timeline view prior to receiving the year input, prior to</p>	<p>iPadOS causes the interface to display an interactive timeline view prior to receiving the year input, prior to receiving the month input, and prior to receiving the day input, the interactive timeline view permitting a user to provide the year input, the month input, the day input, or any combination thereof to group the plurality of digital files.</p>





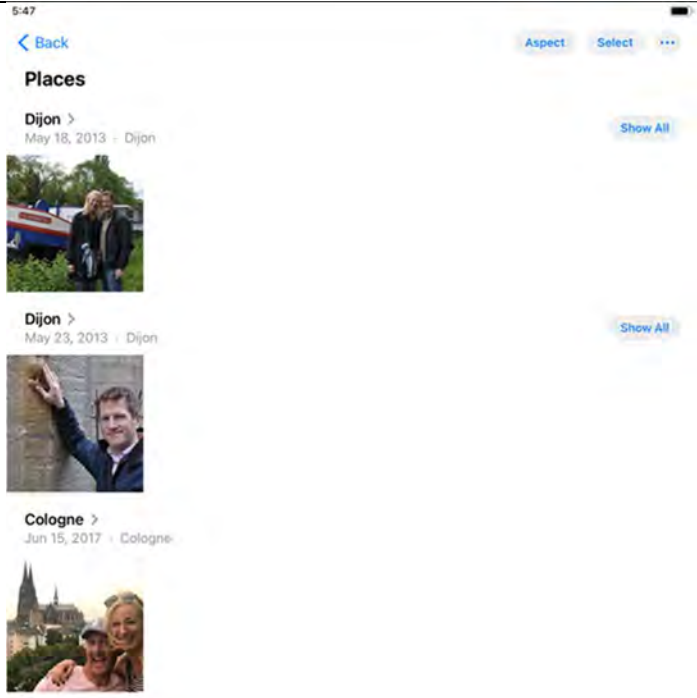
location, and the second indication is associated with a second set of digital files and the second location.



The second indication is associated with a second set of digital files and the second location. For example, iPadOS causes the view below to be displayed responsive to a touch/tap of the second indication.

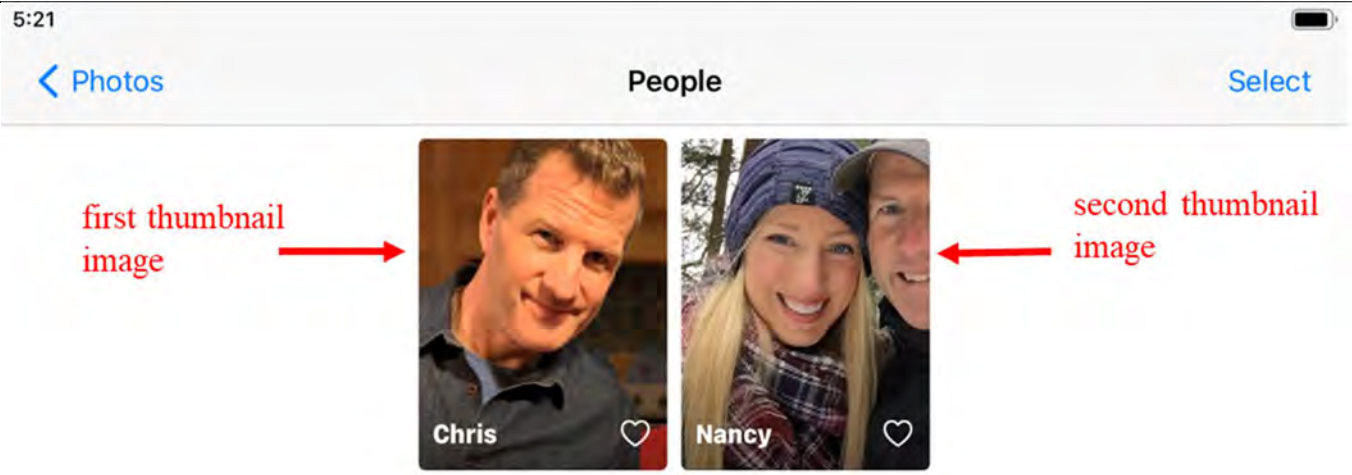
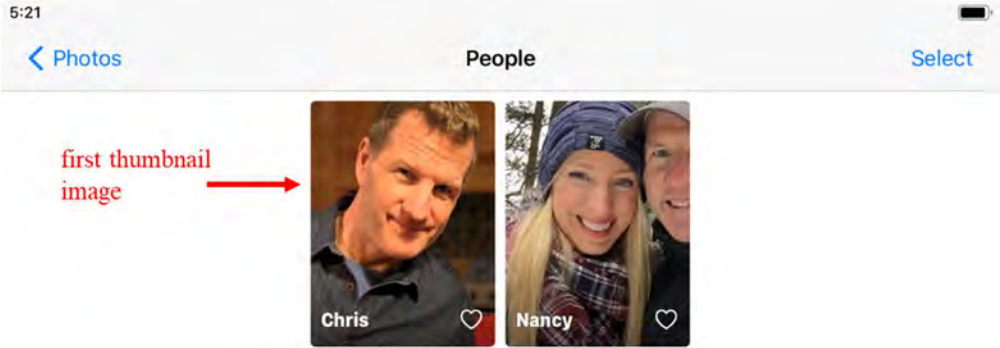


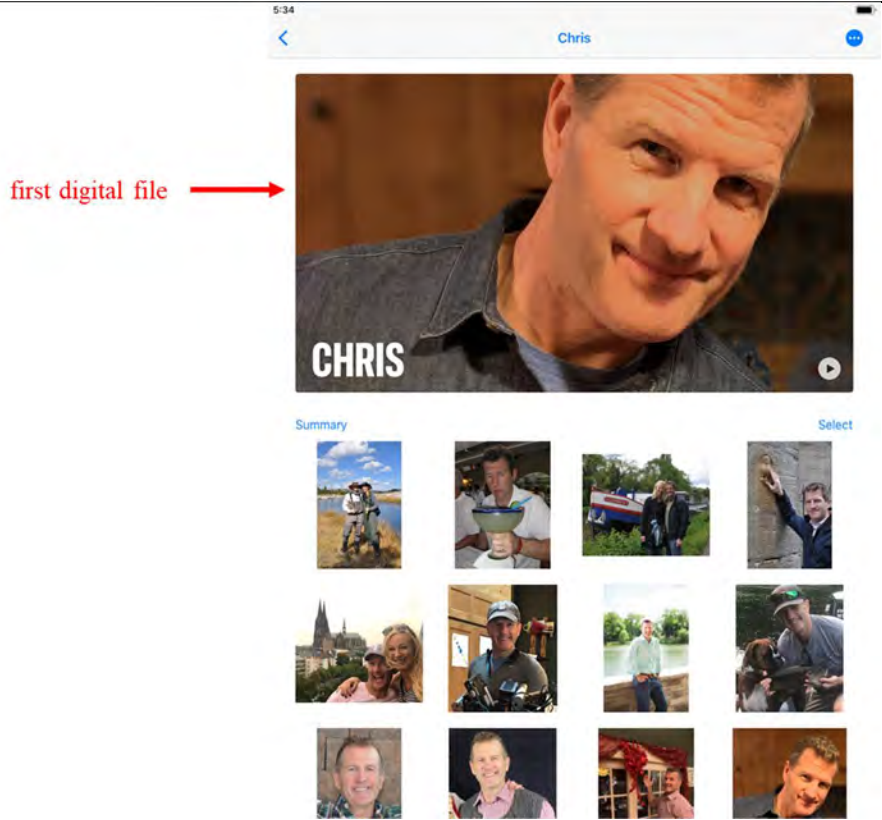
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button and 'Aspect', 'Select', and a three-dot menu icon. The main content is a list of photo albums. The first album is titled 'Dijon' with a right-pointing chevron, dated 'May 18, 2013', and location 'Dijon'. It contains a photo of two people in front of a boat. The second album is also titled 'Dijon' with a right-pointing chevron, dated 'May 23, 2013', and location 'Dijon'. It contains a photo of a man pointing at a stone wall. The third album is titled 'Cologne' with a right-pointing chevron, dated 'Jun 15, 2017', and location 'Cologne'. It contains a photo of two people in front of a church. Each album has a 'Show All' button to its right.</p>
<p><b>35.</b> The method of claim 34, wherein the first set of digital files and the second set of digital files are associated with the first person.</p>	<p>The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first and second sets of digital files include photographs of the first person.</p>

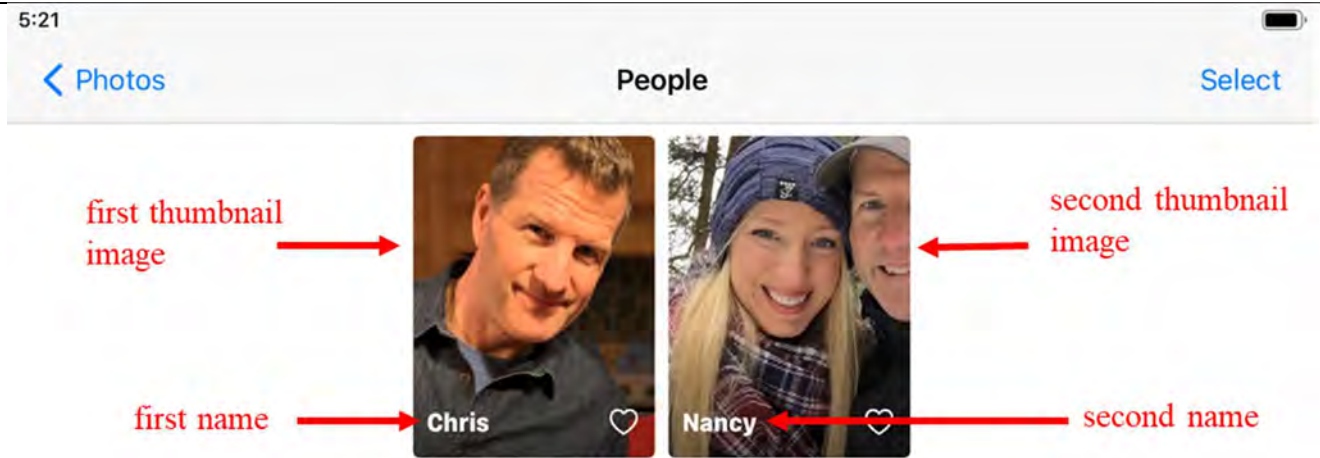
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p><b>36.</b> The method of claim 35, wherein the first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at</p>	<p>The first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>

<p>least a portion of a face of the second person.</p>	 <p>5:21</p> <p>&lt; Photos People Select</p> <p>first thumbnail image →</p> <p>Chris</p> <p>Nancy</p> <p>← second thumbnail image</p>
<p><b>37.</b> The method of claim 36, wherein the first thumbnail image includes at least a portion of the first digital file.</p>	<p>The first thumbnail image in the people view includes at least a portion of the first digital file in the first person view.</p>  <p>5:21</p> <p>&lt; Photos People Select</p> <p>first thumbnail image →</p> <p>Chris</p> <p>Nancy</p>

	 <p>5:34 Chris</p> <p>first digital file →</p> <p>CHRIS</p> <p>Summary Select</p>
<p><b>38.</b> The method of claim 36, wherein, in the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image</p>	<p>In the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image and the second name is displayed adjacent to the second thumbnail image.</p>

and the second name is displayed adjacent to the second thumbnail image.

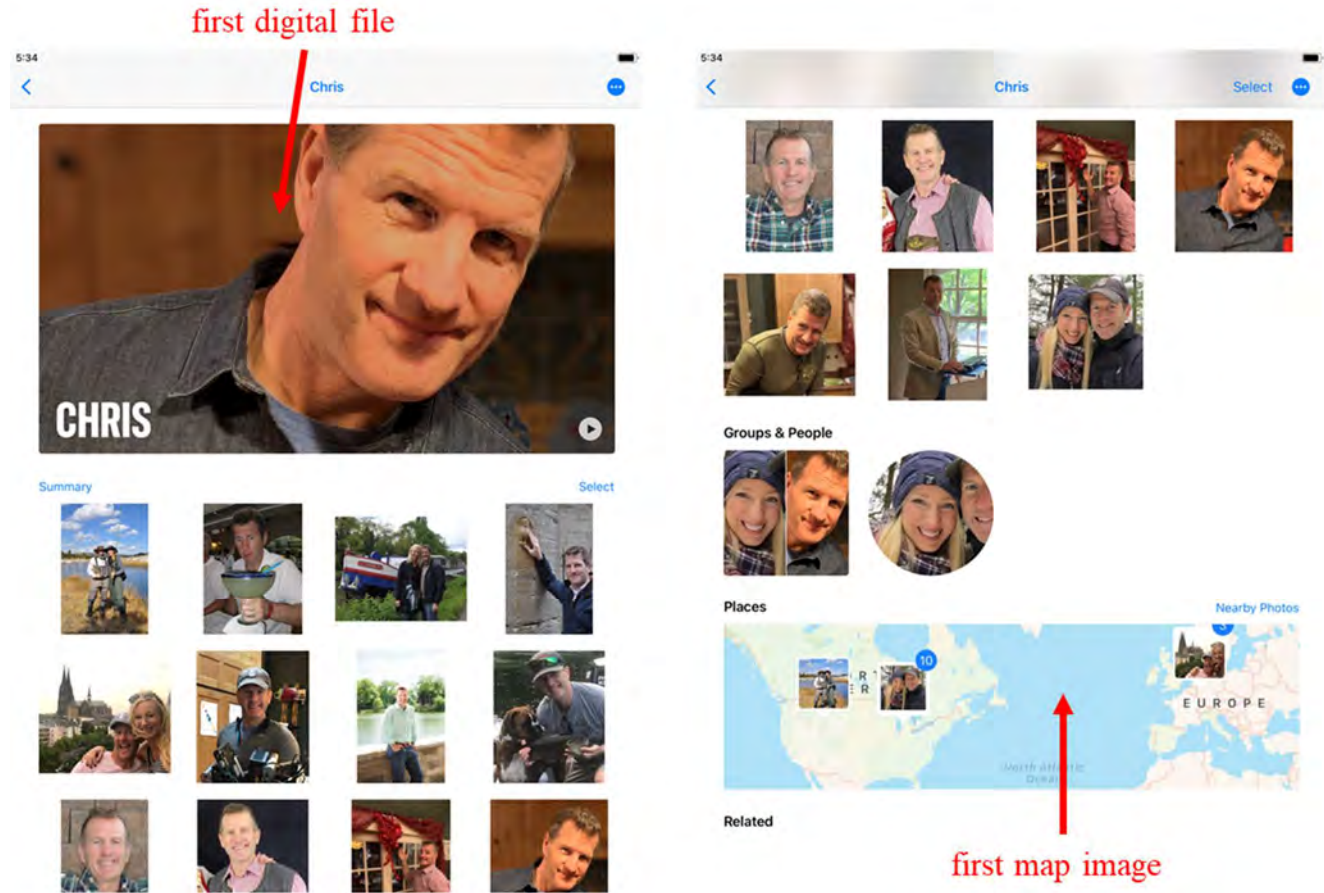


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate the name of the first person that is associated with the first thumbnail image. The way the claimed displaying performs this function is by displaying the first name in sufficient proximity to the first thumbnail image such that a user will associate the first name with the first thumbnail image. The result of the claimed displaying is that the first name is associated with the first thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name is to communicate the name of the second person that is associated with the second thumbnail image. The way the claimed displaying performs this function is by displaying the second name in sufficient proximity to the second thumbnail image such that a user will associate the second name with the second thumbnail image. The result of the claimed displaying is that the second name is associated with the second thumbnail image. iPadOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

**39.** The method of claim 38, wherein, in the first person view, the first map image is positioned below the first digital file.


In the first person view, the first map image is positioned below the first digital file.



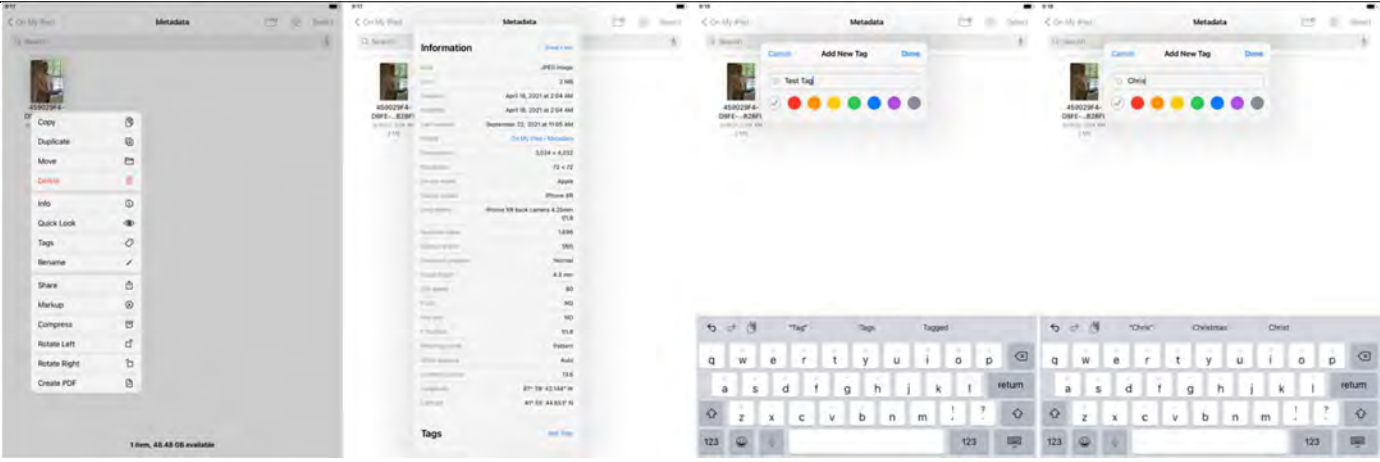
**40[pre]** The method of claim 31, further comprising,

See information for claim 31.

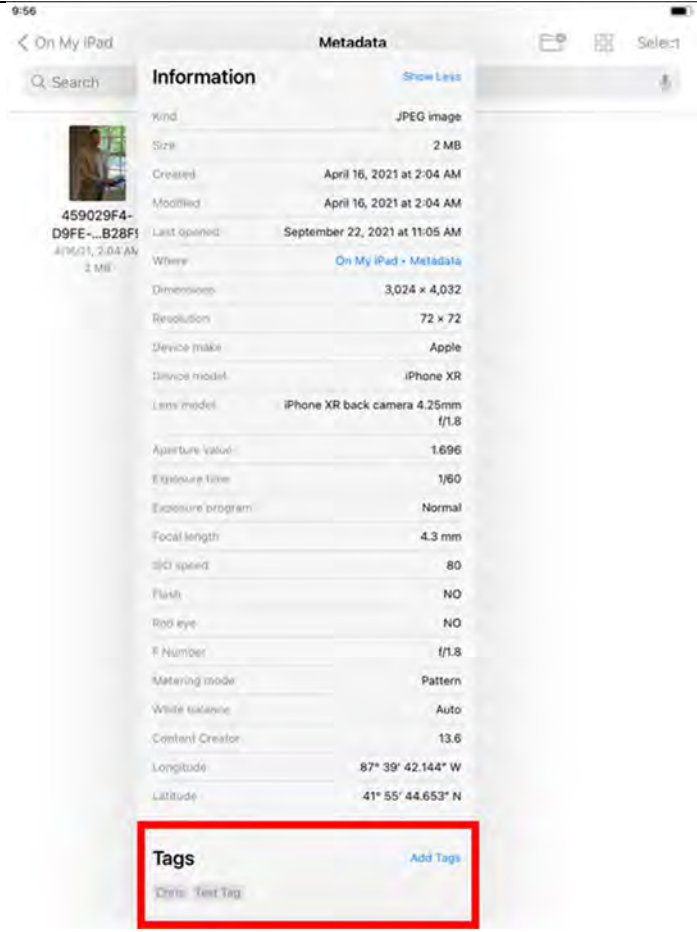


<p><b>40[a]</b> prior to the causing the interface to display the people view: causing the first digital file to be displayed on the interface;</p>	<p>Prior to the causing the interface to display the people view, iPadOS causes the first digital file to be displayed on the interface.</p>  <p>The image is a screenshot of the iPadOS Photos application in gallery view. At the top, there is a navigation bar with a back arrow, the word 'Photos', and filters for 'Years', 'Months', 'Days', and 'All Photos'. Below the navigation bar, a date range 'Nov 4, 2012 - Sep 13, 2021' and the location 'Chicago - Lincoln Park' are displayed. The main area is a grid of photo thumbnails. A red rectangular box highlights a specific photo in the grid, which shows a man in a brown jacket standing in front of a window.</p>
<p><b>40[b]</b> receiving alphanumeric text as a first user-generated tag; and</p>	<p>iPadOS receives alphanumeric text as a first user-generated tag. As a first example, iPadOS receives alphanumeric text as a first user-generated tag via the Files application.</p>

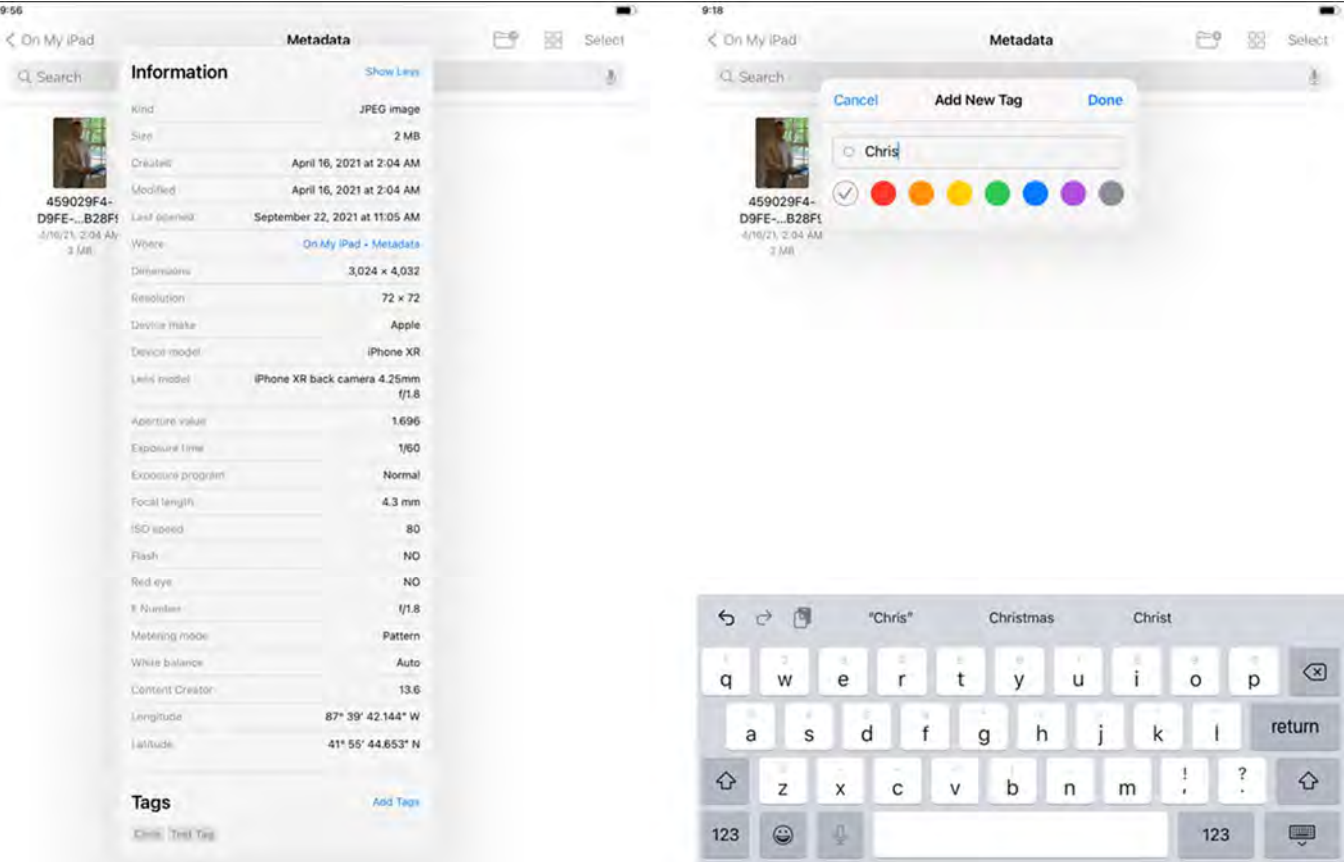
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	 <p>The image displays four sequential screenshots of the iPadOS Metadata interface. The first screenshot shows a context menu with options like Copy, Duplicate, Move, Delete, Info, Quick Lock, Tags, Rename, Share, Markup, Compress, Rotate Left, Rotate Right, and Create PDF. The second screenshot shows the 'Information' page for a file, listing details such as creation and modification dates, location, and device information. The third and fourth screenshots show the 'Add New Tag' dialog box, where a user can create a new tag (e.g., 'Test Tag' or 'Chris') and assign it to the selected file.</p>
<p>40[c] associating the first digital file with the first user-generated tag.</p>	<p>iPadOS associates the first digital file with the first user-generated tag.</p>

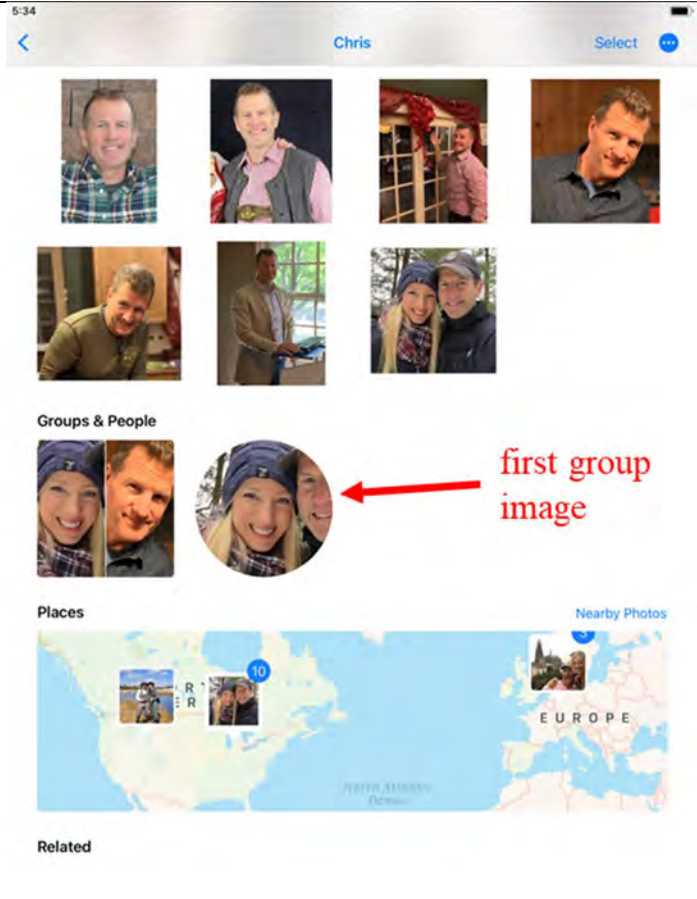
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	 <p>The screenshot shows the 'Metadata' page for a photo on an iPad. The photo is titled '459029F4-D9FE-...B28F' and is 2 MB in size. The metadata includes details such as 'Kind: JPEG image', 'Size: 2 MB', 'Created: April 16, 2021 at 2:04 AM', and 'Device make: Apple'. At the bottom, the 'Tags' section is highlighted with a red box and shows a single tag: 'Chris Text Tag'.</p>
<p><b>41.</b> The method of claim 40, wherein the first user-generated tag includes the name of the first person.</p>	<p>The first user-generated tag can include the name of the first person.</p>

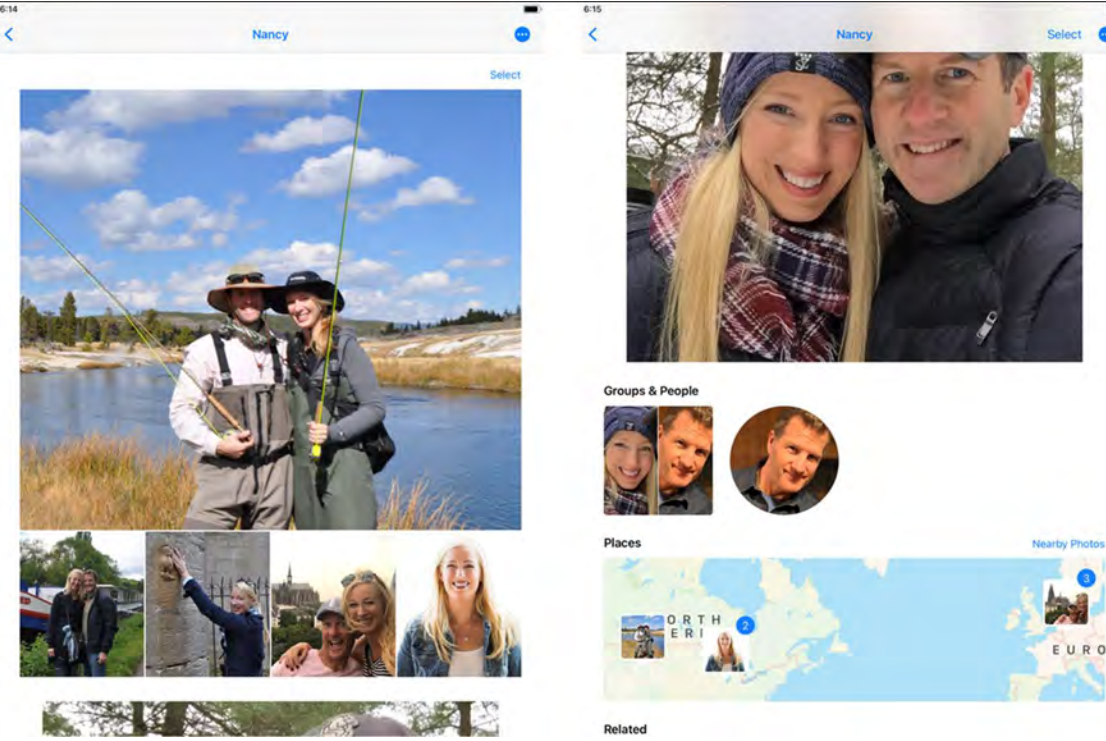
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	
<p><b>42.</b> The method of claim 41, further comprising exporting the first digital file to a remote device, the exported first digital file</p>	<p>iPadOS exports the first digital file to a remote device, and the exported first digital file includes information associated with the first user-generated tag. For example, iOS can export the first digital file to a remote device such as an Apple MacBook (e.g., via AirDrop). Information associated with the first user-generated tag is exported to the MacBook, as shown below.</p>

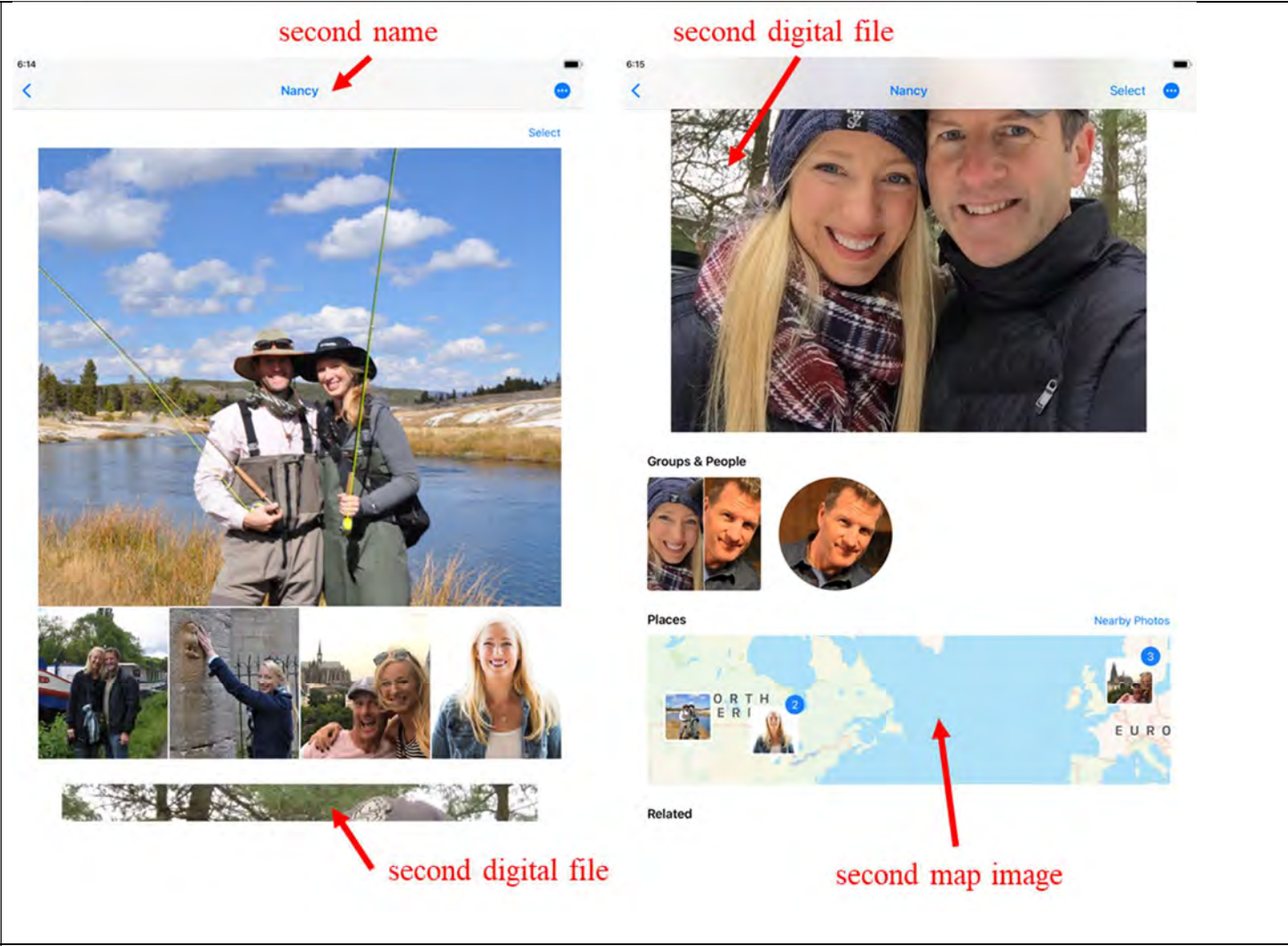
<p>including information associated with the first user-generated tag.</p>	
<p><b>43[pre]</b> The method of claim 31, wherein</p>	<p><i>See information for claim 31.</i></p>
<p><b>43[a]</b> the first person view includes a first group image and</p>	<p>The first person view includes a first group image.</p>

	 <p>The screenshot shows an iPadOS photo gallery for a contact named 'Chris'. At the top, there is a status bar with the time '5:34', a back arrow, the name 'Chris', and a 'Select' button with a three-dot menu. Below the header is a grid of photos. Underneath the grid is a section titled 'Groups &amp; People' which contains two group photos. The first group photo is highlighted with a red circle, and a red arrow points to it from the text 'first group image'. Below this is a 'Places' section showing a map of the United States and Europe with photo thumbnails. At the bottom is a 'Related' section.</p>
<p><b>43[b]</b> responsive to an input that is indicative of a selection of the first group image, causing a first group view to be displayed on the interface, the first</p>	<p>Responsive to an input that is indicative of a selection of the first group image (e.g., tapping the first group image), iPadOS causes a first group view to be displayed on the interface, the first group view including one or more digital files associated with another person that is associated with the first person.</p>



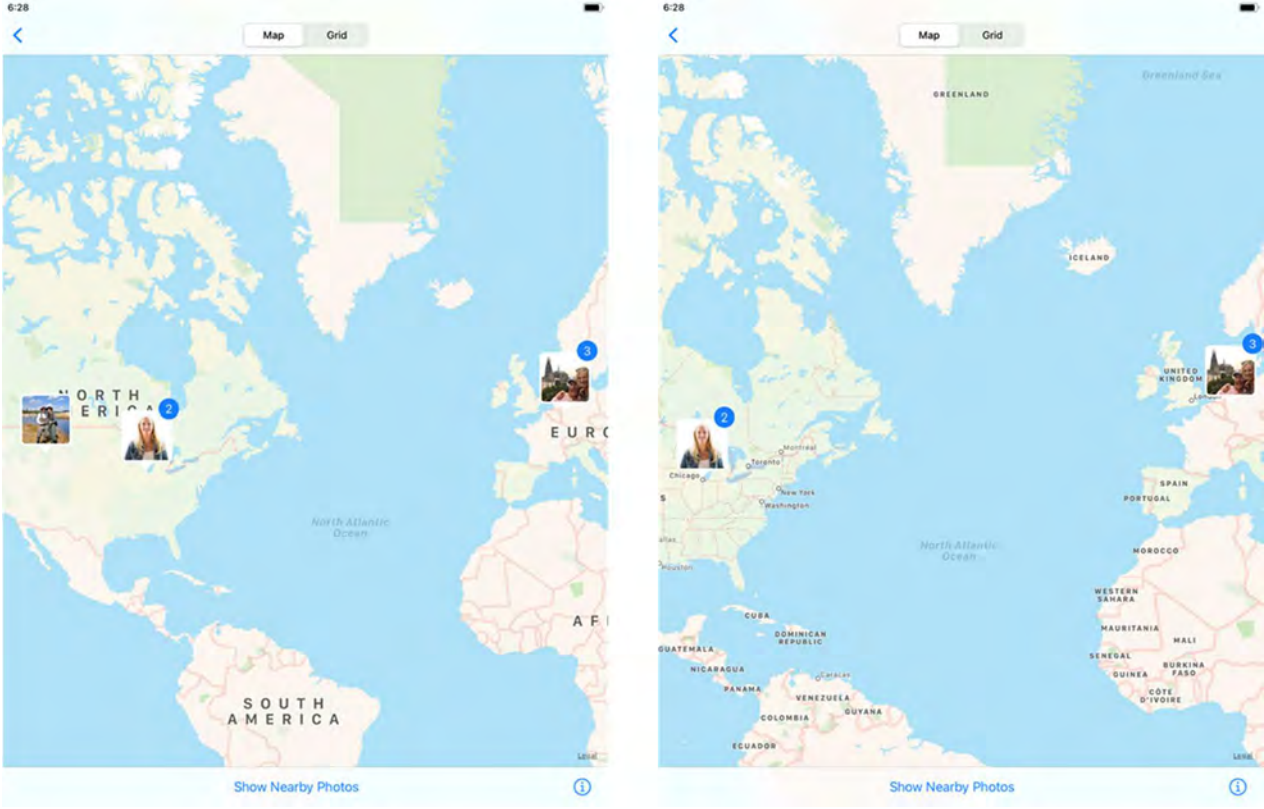
<p>group view including one or more digital files associated with another person that is associated with the first person.</p>	
<p><b>44.</b> The method of claim 43, wherein the another person is the second person.</p>	<p>The another person is the second person. <i>See</i> information for limitations 31[a][iii]-[iv] and claim 43.</p>
<p><b>45.</b> The method of claim 35, further comprising responsive to an input that is</p>	<p>Responsive to an input that is indicative of a selection associated with the second person, iPadOS causes a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.</p>


indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.



**46[pre]** The method of claim

See information for claim 45.

<p>45, further comprising:</p>	
<p><b>46[a]</b> responsive to an input that is indicative of a selection of the second map image in the second person view (e.g., tapping the second map image), iPadOS causes a second location view to be displayed on the interface, <b>46[b]</b> the second location view including: the interactive geographic map,</p>	<p>Responsive to an input that is indicative of a selection of the second map image in the second person view (e.g., tapping the second map image), iPadOS causes a second location view to be displayed on the interface.</p> 
<p><b>46[c]</b> a third indication positioned at a third location on the interactive geographic map,</p>	<p>The second location view includes the interactive geographic map, a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.</p>

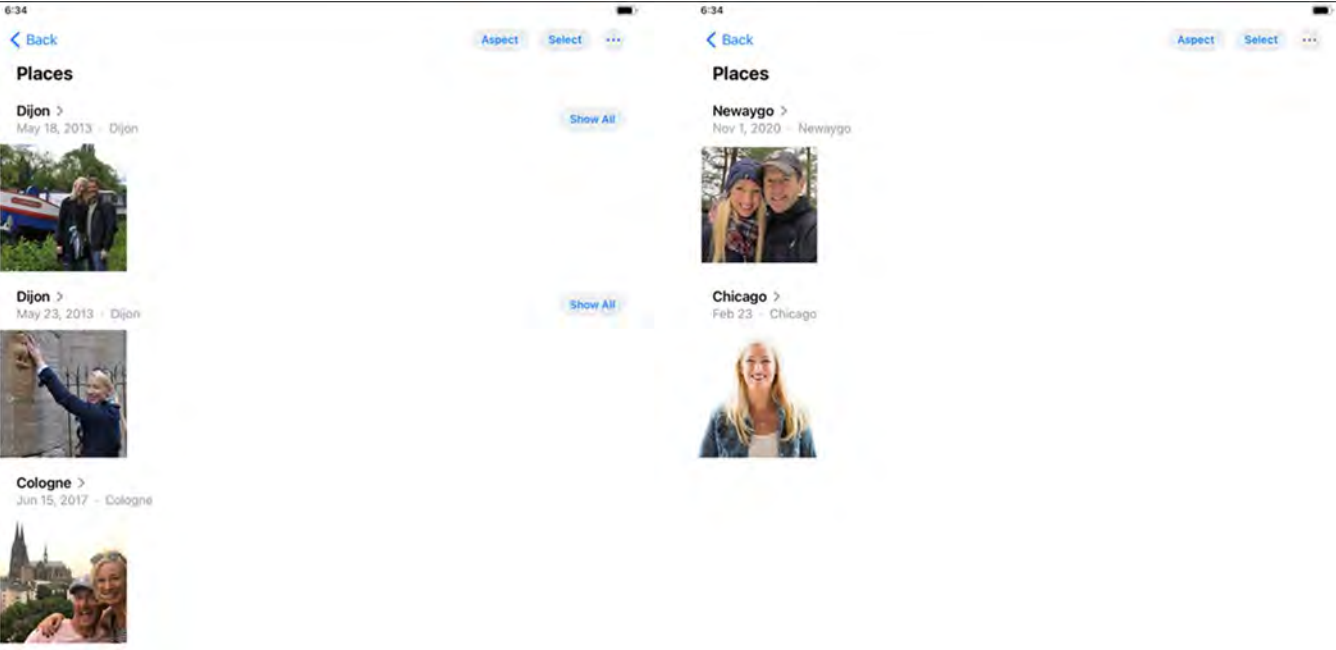
<p>geographic map, and <b>46[d]</b> a fourth indication positioned at a fourth location on the interactive geographic map.</p>	
<p><b>47.</b> The method of claim 46, wherein the third indication is associated with a third set of digital files and the third location, and the fourth indication is associated with a fourth set of</p>	<p>The third indication is associated with a third set of digital files and the third location. For example, iPadOS displays the view below responsive to tapping the third indication.</p>



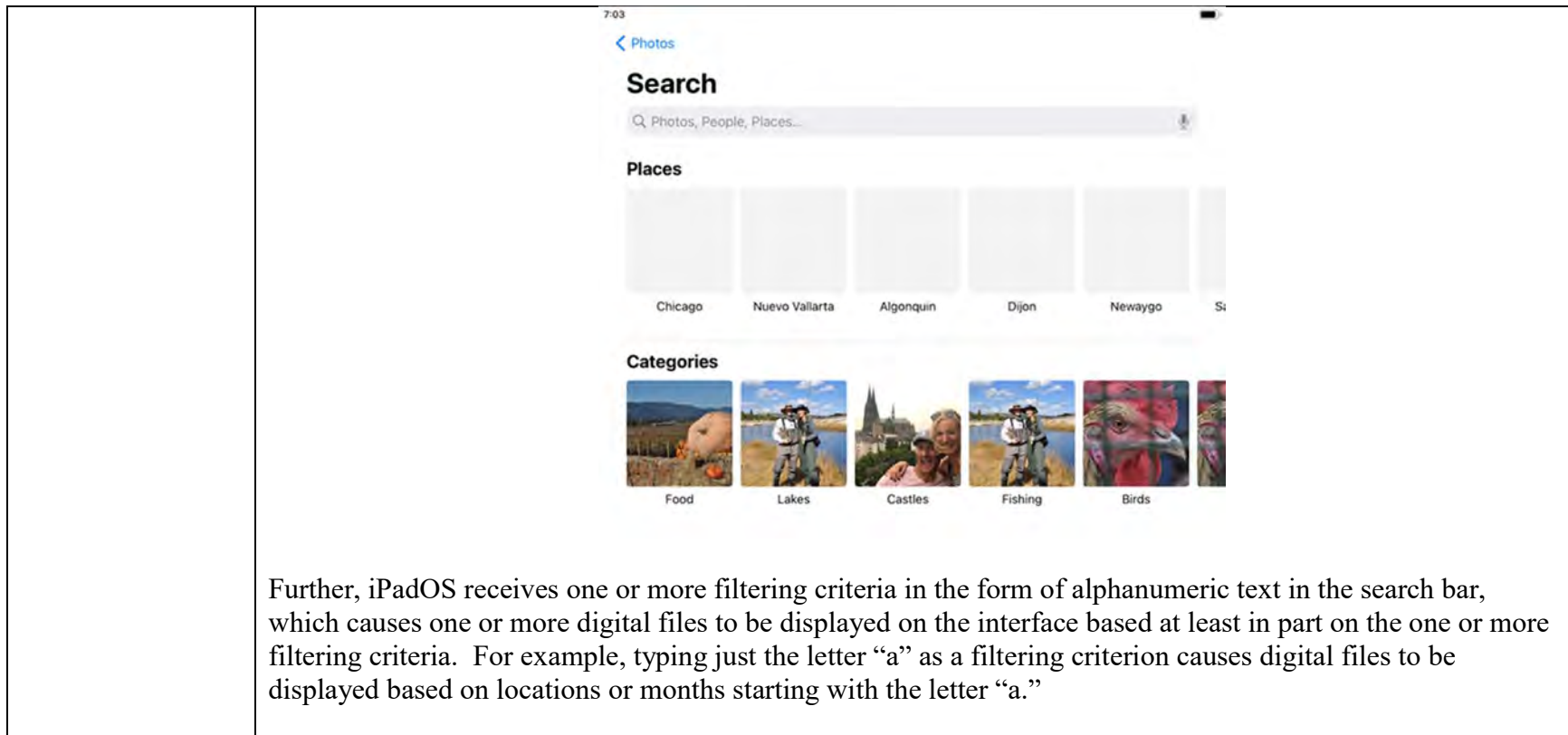
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p>digital files and the fourth location.</p>	<div data-bbox="835 191 1522 682" data-label="Image"> </div> <p>The fourth indication is associated with a fourth set of digital files and the fourth location. For example, iPadOS displays the view below responsive to tapping the fourth indication.</p>
<p><b>48.</b> The method of claim 47, wherein the third set of digital files and the fourth set of digital files are associated with the second person.</p>	<p>The third set of digital files and the fourth set of digital files are associated with the second person. As shown each below, each of the digital files includes a photograph of the second person.</p>

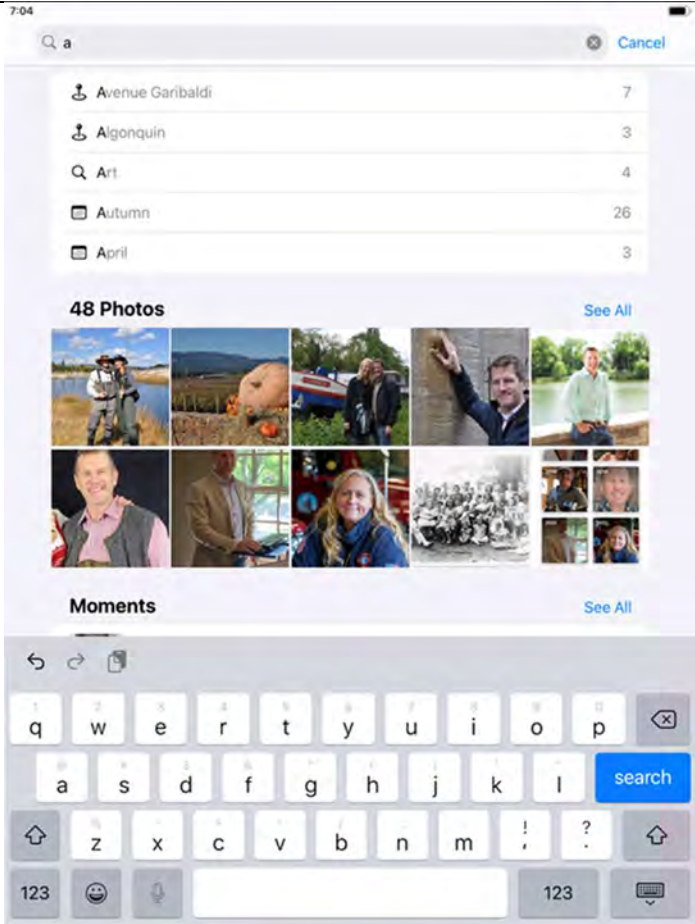
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

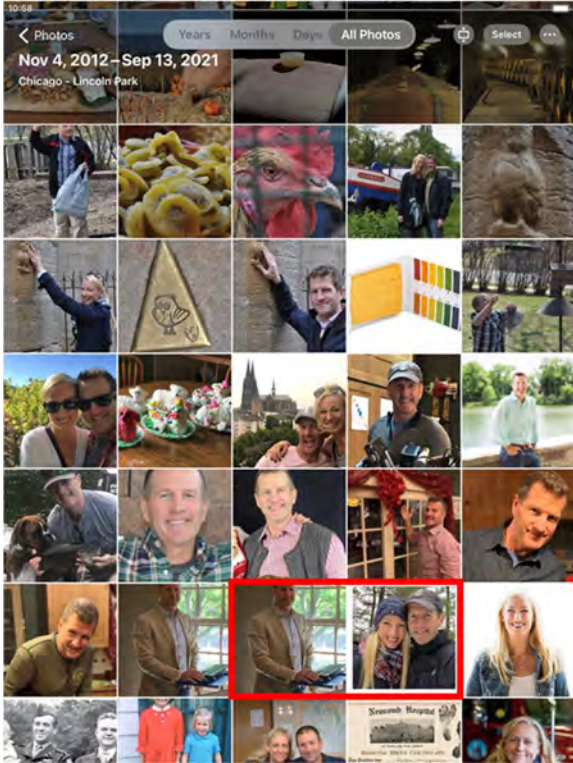
	
<p><b>49.</b> The method of claim 31, further comprising receiving one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria.</p>	<p>iPadOS receives one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, iPadOS provides filtering criteria based on places (e.g., Chicago) and categories (e.g., food, castles, fishing, birds, animals, etc.).</p>



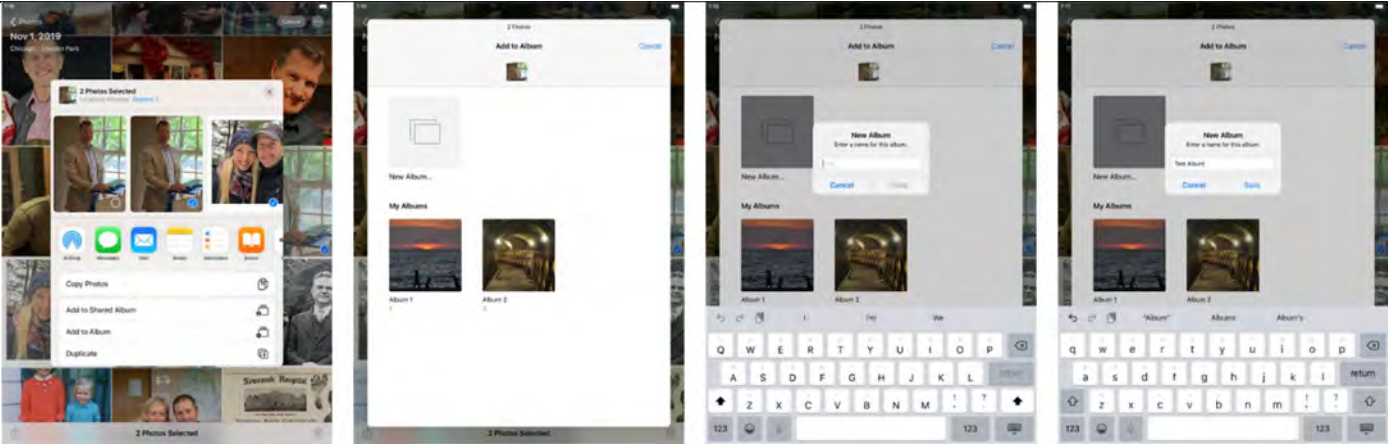


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

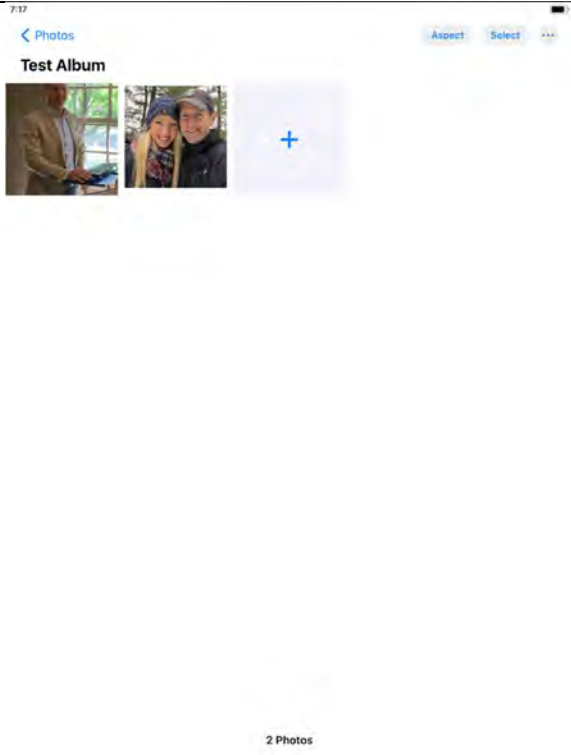
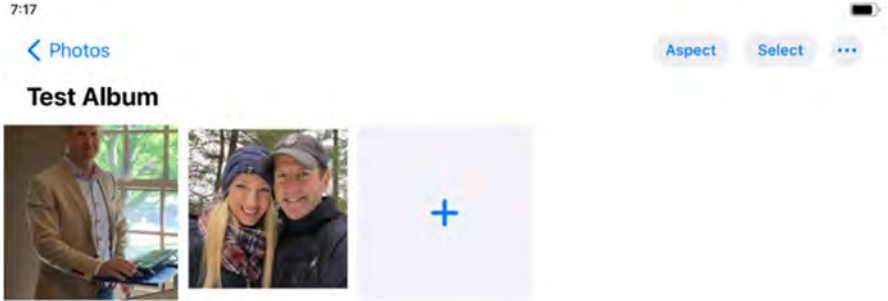
	 <p>The screenshot shows the iPadOS search interface with the letter 'a' entered. The results are categorized into locations (Avenue Garibaldi with 7 results, Algonquin with 3), categories (Art with 4, Autumn with 26, April with 3), 48 photos, and Moments. A keyboard is visible at the bottom.</p> <p>The filtering criteria discussed above are exemplary: iPadOS may receive many different filtering criteria.</p>
<p><b>50[pre]</b> The method of claim 49, further comprising:</p>	<p>See information for claim 49.</p>

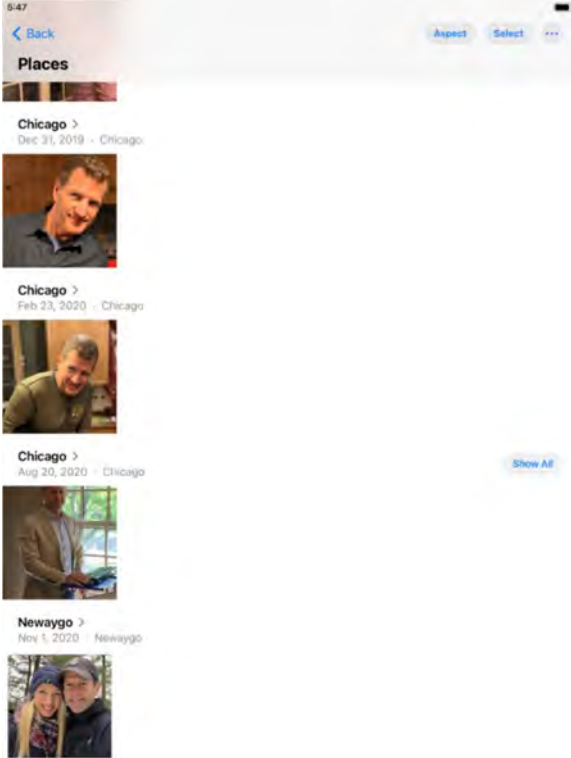
<p><b>50[a]</b> causing a second plurality of images to be displayed on the interface;</p>	<p>iPadOS causes a plurality of images to be displayed on the interface.</p> 
<p><b>50[b]</b> receiving alphanumeric text as the album name;</p>	<p>iPadOS receives alphanumeric text as the album name. For example, iPadOS displays an “Add to Album” option responsive to a selection of the plurality of images. iPadOS then displays a “New Album” option and a prompt to enter alphanumeric text as the album name.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

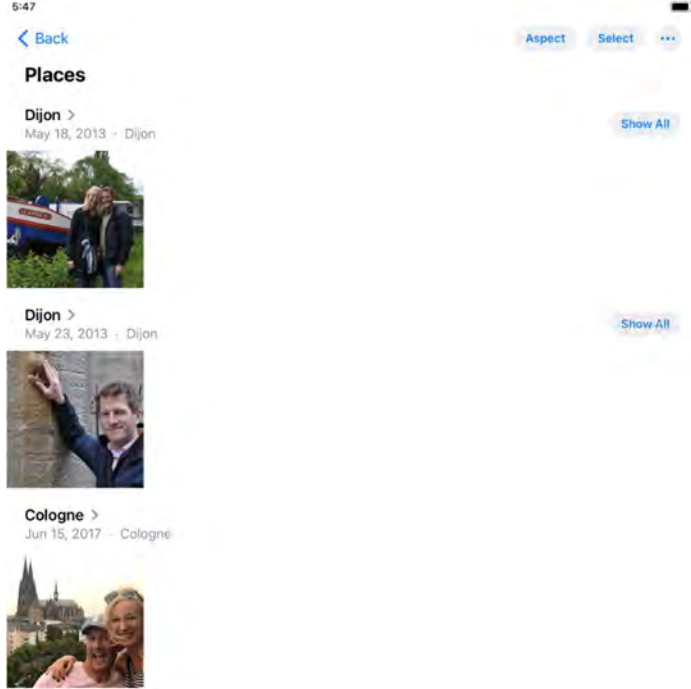
	 <p>The figure consists of four sequential screenshots of an iPadOS photo gallery interface. The first screenshot shows a grid of photos with a '2 Photos Selected' overlay and a sharing menu. The second screenshot shows the 'Add to Album' screen with a 'New Album' dialog box. The third screenshot shows the 'New Album' dialog box with a keyboard visible. The fourth screenshot shows the 'New Album' dialog box with the keyboard visible and the album name 'Album' entered.</p>
<p>50[c] causing each of the second plurality of images to be associated with an album name; and</p>	<p>iPadOS causes each of the plurality of images to be associated with an album name. For example, as shown below, each of the plurality of images are displayed with the album name.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

	 <p>A screenshot of the iPadOS Photos app interface. At the top, the time is 7:17. Below the status bar, there is a back arrow and the word 'Photos'. The main title is 'Test Album'. Below the title, there are two photo thumbnails: one of a man in a suit and one of a couple. To the right of these thumbnails is a large, light blue square with a white plus sign. At the bottom center, the text '2 Photos' is visible. In the top right corner, there are three buttons: 'Aspect', 'Select', and a three-dot menu icon.</p>
<p><b>50[d]</b> causing an album view to be displayed on the interface, the album view including the album name and the second plurality of images.</p>	<p>iPadOS causes an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>  <p>A second screenshot of the iPadOS Photos app interface, identical to the one above. It shows the 'Test Album' view with two photo thumbnails and a plus sign. The text '2 Photos' is visible at the bottom center. The top right corner contains 'Aspect', 'Select', and a three-dot menu icon.</p>

<p><b>51[pre].</b> The method of claim 32, further comprising</p>	<p>See information for claim 32.</p>
<p><b>51[a]</b> responsive to a selection associated with the first location, causing the first set of digital files to be displayed on the interface and</p>	<p>Responsive to a selection associated with the first location (e.g., responsive to a touch/tap of the first indication in the first location view) causing the first set of digital files to be displayed on the interface.</p>  <p>The screenshot shows an iPadOS interface titled 'Places'. At the top, there is a navigation bar with a back arrow, the time '9:47', and buttons for 'Aspect', 'Select', and a menu icon. Below the title, there are several photo album thumbnails. The first album is titled 'Chicago &gt;' with a date of 'Dec 31, 2019' and a location of 'Chicago'. It contains a photo of a man. The second album is also titled 'Chicago &gt;' with a date of 'Feb 23, 2020' and a location of 'Chicago', containing a photo of a man. The third album is titled 'Chicago &gt;' with a date of 'Aug 20, 2020' and a location of 'Chicago', containing a photo of a man. The fourth album is titled 'Newaygo &gt;' with a date of 'Nov 1, 2020' and a location of 'Newaygo', containing a photo of a man and a woman. A 'Show All' button is visible on the right side of the interface.</p>



<p><b>51[b]</b> responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.</p>	<p>Responsive to a selection associated with the second location (e.g., responsive to a touch/tap of the second indication in the first location view) causing the first set of digital files to be displayed on the interface.</p> 
<p><b>52.</b> The method of claim 51, further comprising causing (i) a first number associated with a number of digital files in the first set of digital files to be</p>	<p>The first location view displayed by iPadOS includes (i) a first number associated with a number of digital files in the first set of digital files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files on the interface.</p>

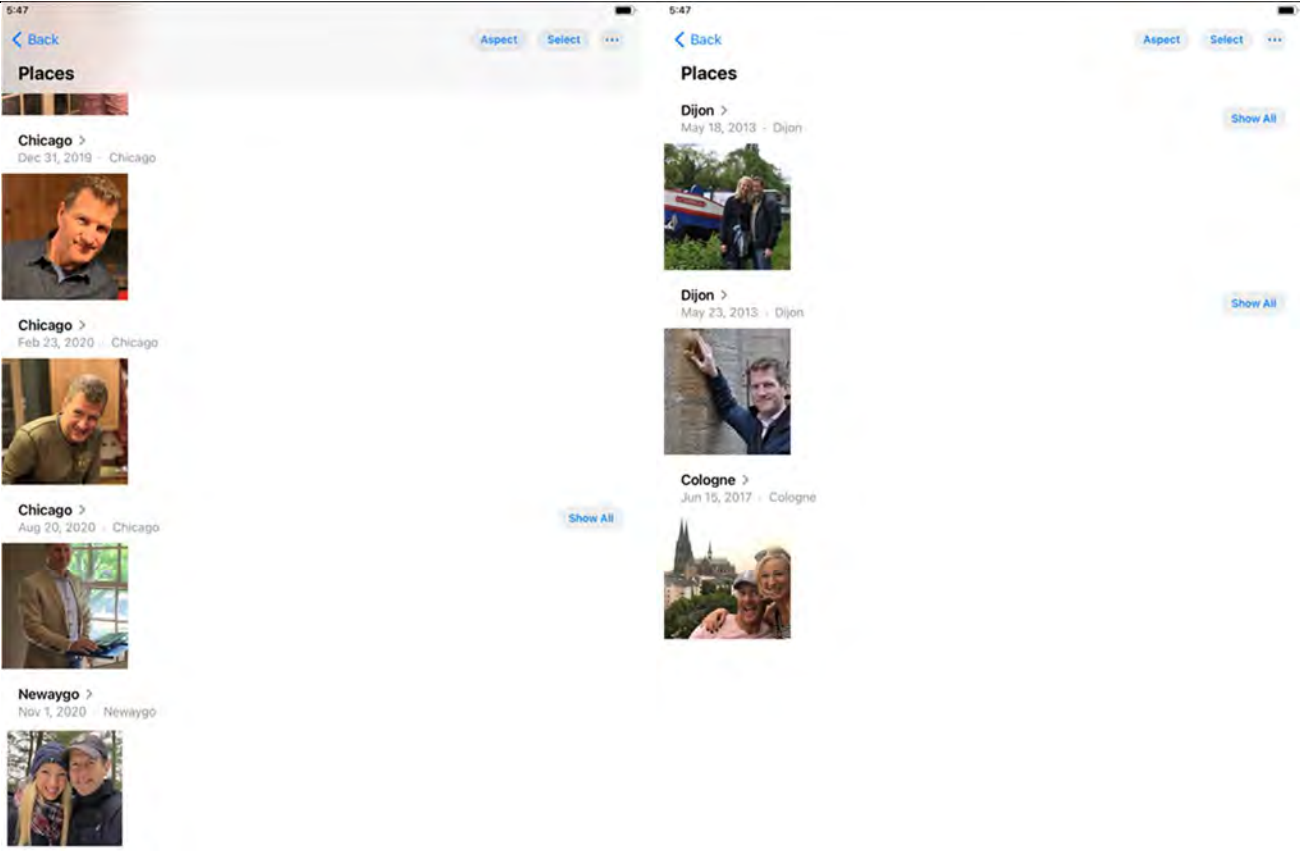
displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.

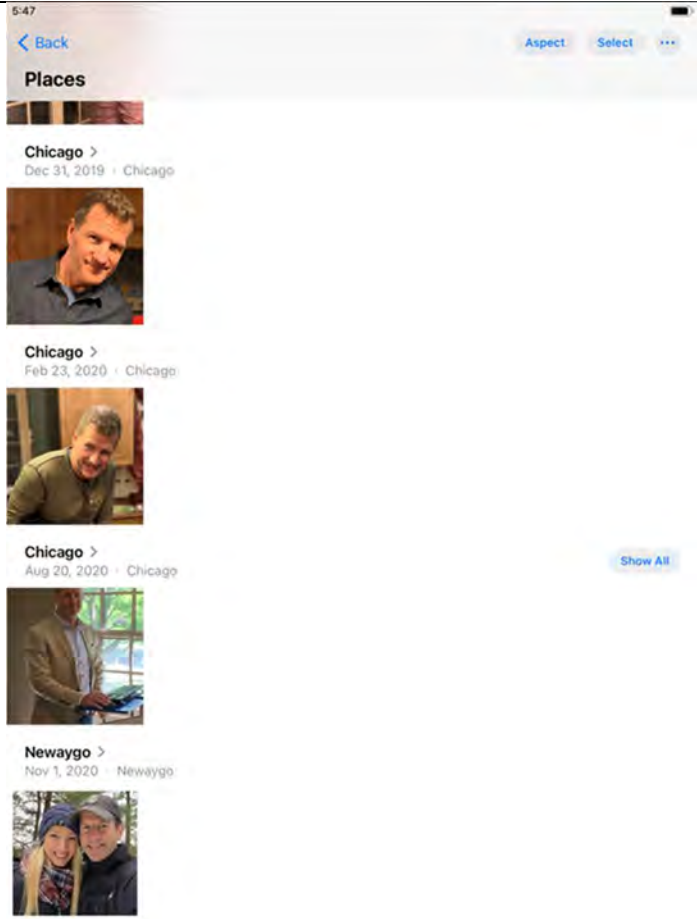


**53.** The method of claim 33, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files

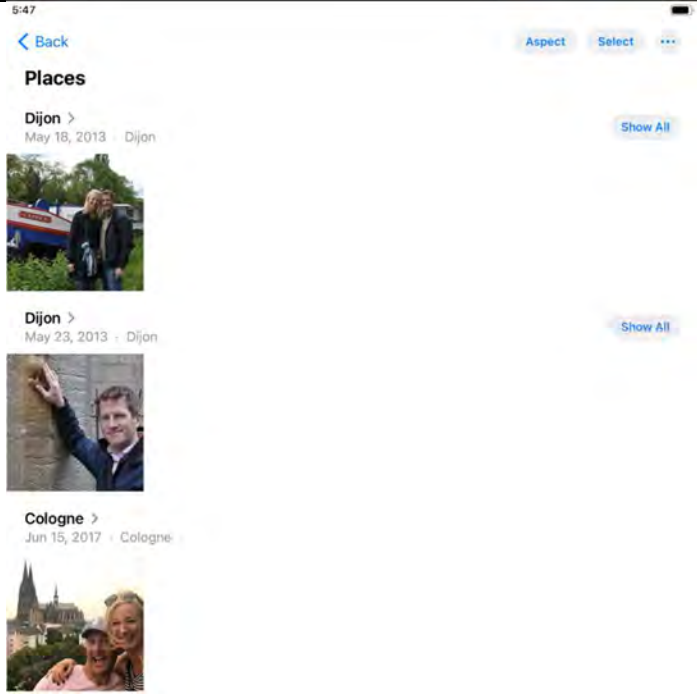
include a photo, a video, or both.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

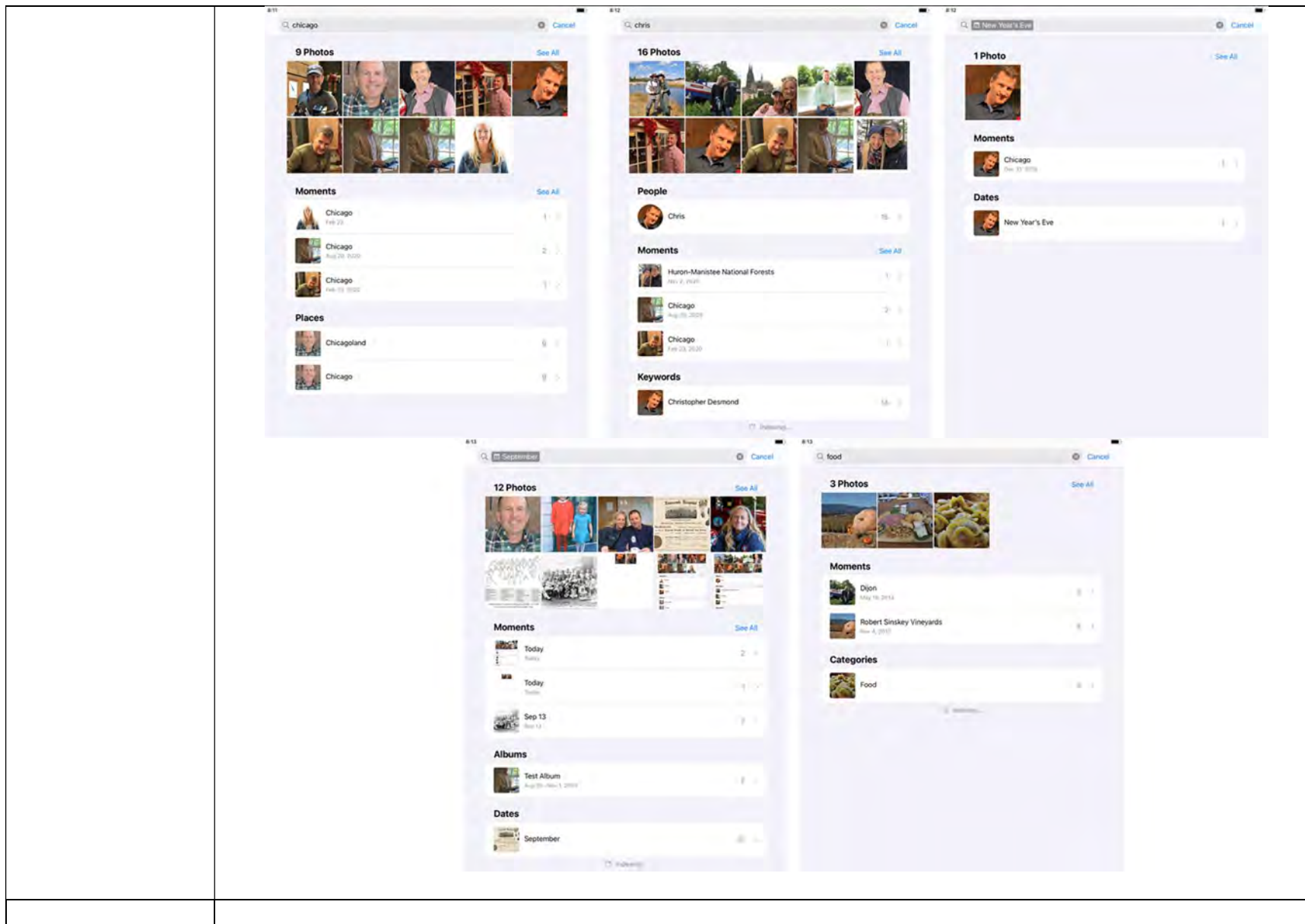
<p>digital files, and the second set of digital files include a photo, a video, or both.</p>	
<p><b>55[pre]</b> The method of claim 51,</p>	<p>See information for claim 51.</p>
<p><b>55[a]</b> wherein the first set of digital files displayed on the interface responsive to the</p>	<p>The first set of digital files displayed on the interface responsive to the selection associated with the first location is not overlaid on the interactive geographic map.</p>

<p>selection associated with the first location are not overlaid on the interactive geographic map and</p>	
<p><b>55[b]</b> the second set of digital files displayed on the interface responsive to the selection associated with the</p>	<p>The second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

<p>second location are not overlaid on the interactive geographic map.</p>	 <p>The screenshot shows an iPadOS interface with a 'Places' section. It lists three entries: 'Dijon' (May 18, 2013), 'Dijon' (May 23, 2013), and 'Cologne' (Jun 15, 2017). Each entry includes a small photo and a 'Show All' button. The interface also shows a 'Back' button, 'Aspect' and 'Select' options, and a time of 5:47.</p>
<p><b>56.</b> The method of claim 49, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>

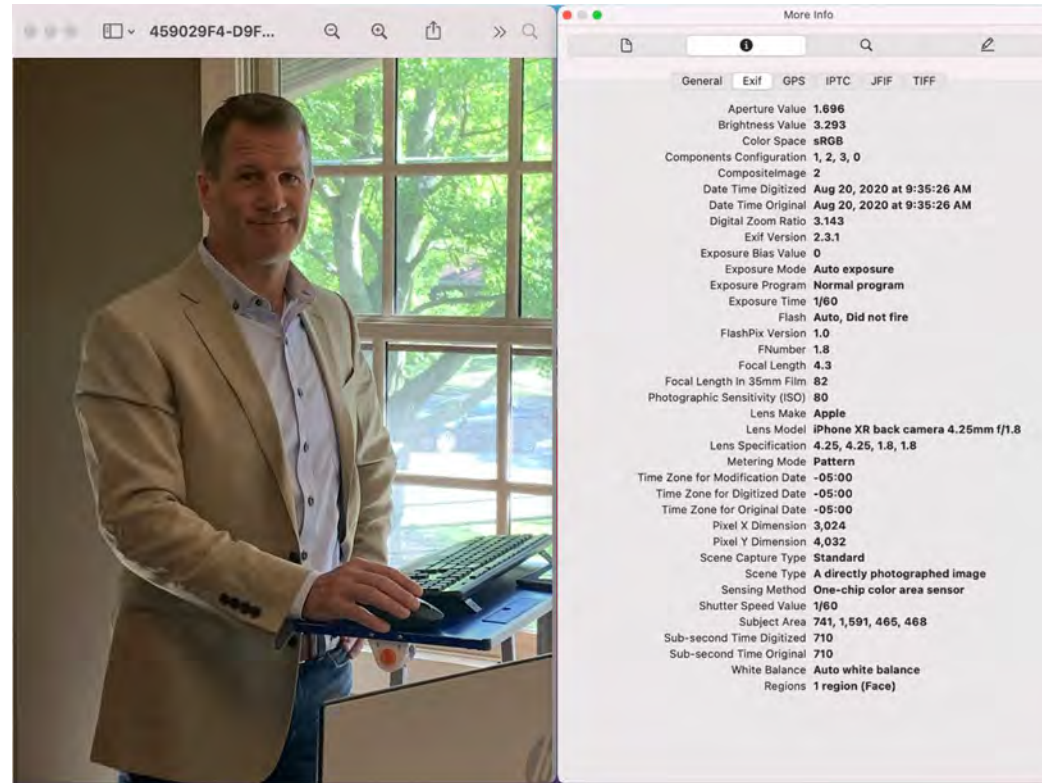
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS





**57.** The method of claim 42, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file.

Exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file. For example, iPadOS can export the first digital file to macOS (e.g., via AirDrop), and the EXIF data associated with the first digital file is visible in macOS.



**58.** The method of claim 31, wherein the input that is indicative of the selection of the first person

The input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image associated with the first person. *See* information for limitation 31[b].

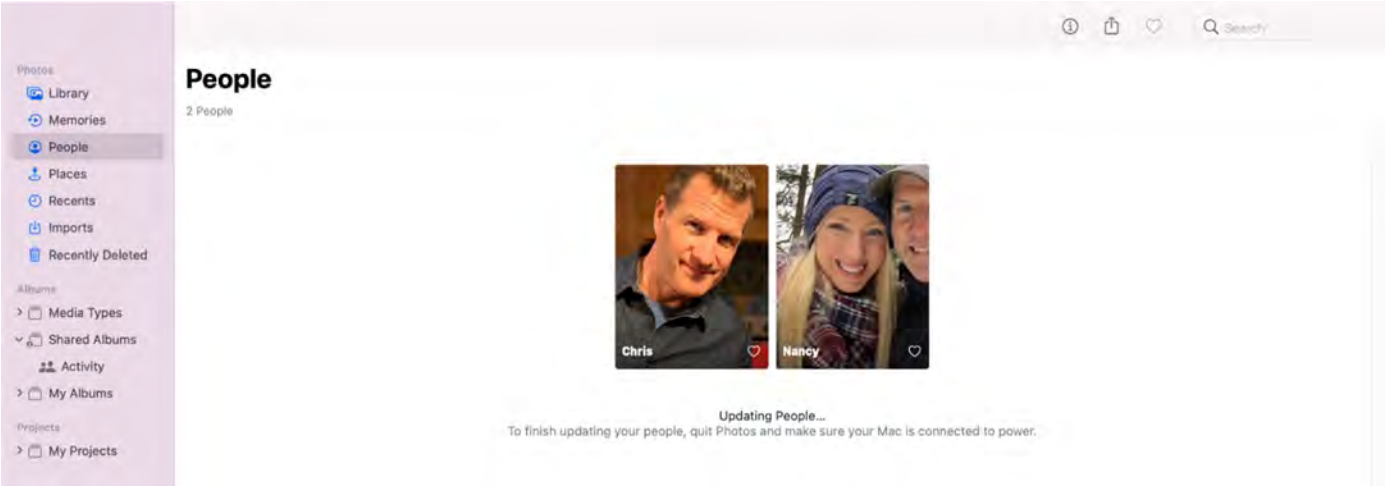
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

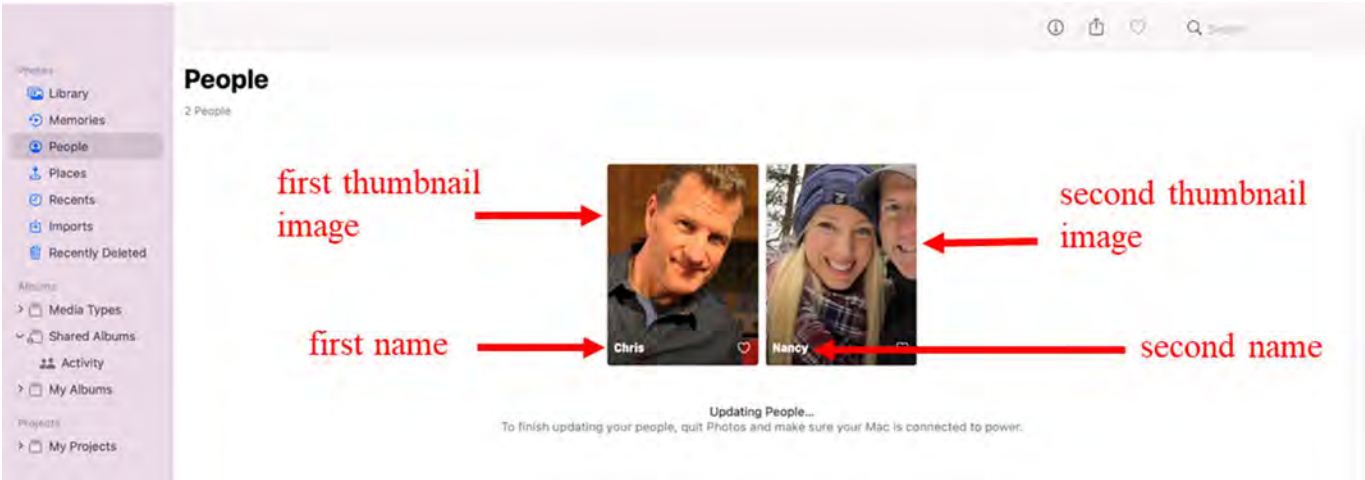
includes a touch or click of the first thumbnail image associated with the first person.	
<b>59.</b> The method of claim 31, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.	The input that is indicative of the selection of the first map image is a touch or click of the first map image. <i>See</i> information for limitation 31[c].

# **Exhibit D.3**

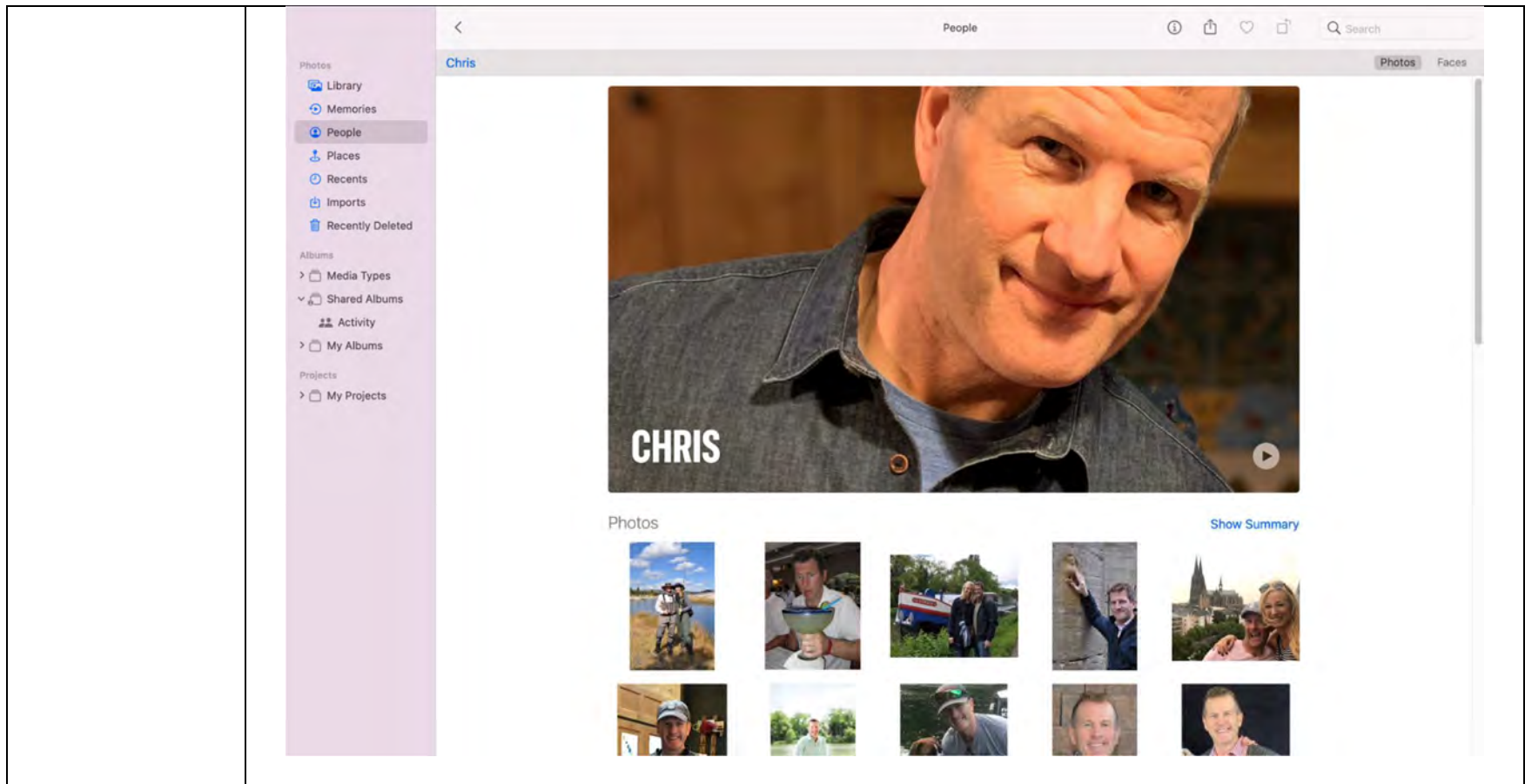
**U.S. Patent No. 11,017,020 – Infringement Claim Chart**

The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 11,017,020 (“the ‘020 patent”) in Apple macOS (including the Photos application). The exemplary screenshots below were taken using an Apple MacBook Pro running macOS 11.5.2 and Photos Version 6.0 (361.0.100). While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

CLAIM ELEMENT	APPLE’S INFRINGEMENT
<p><b>1[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, macOS performs a method, as set forth below.</p>
<p><b>1[a]</b> causing an interface to display a people view, the people view including:</p>	<p>macOS causes an interface (e.g., an Apple MacBook) to display a people view.</p> 

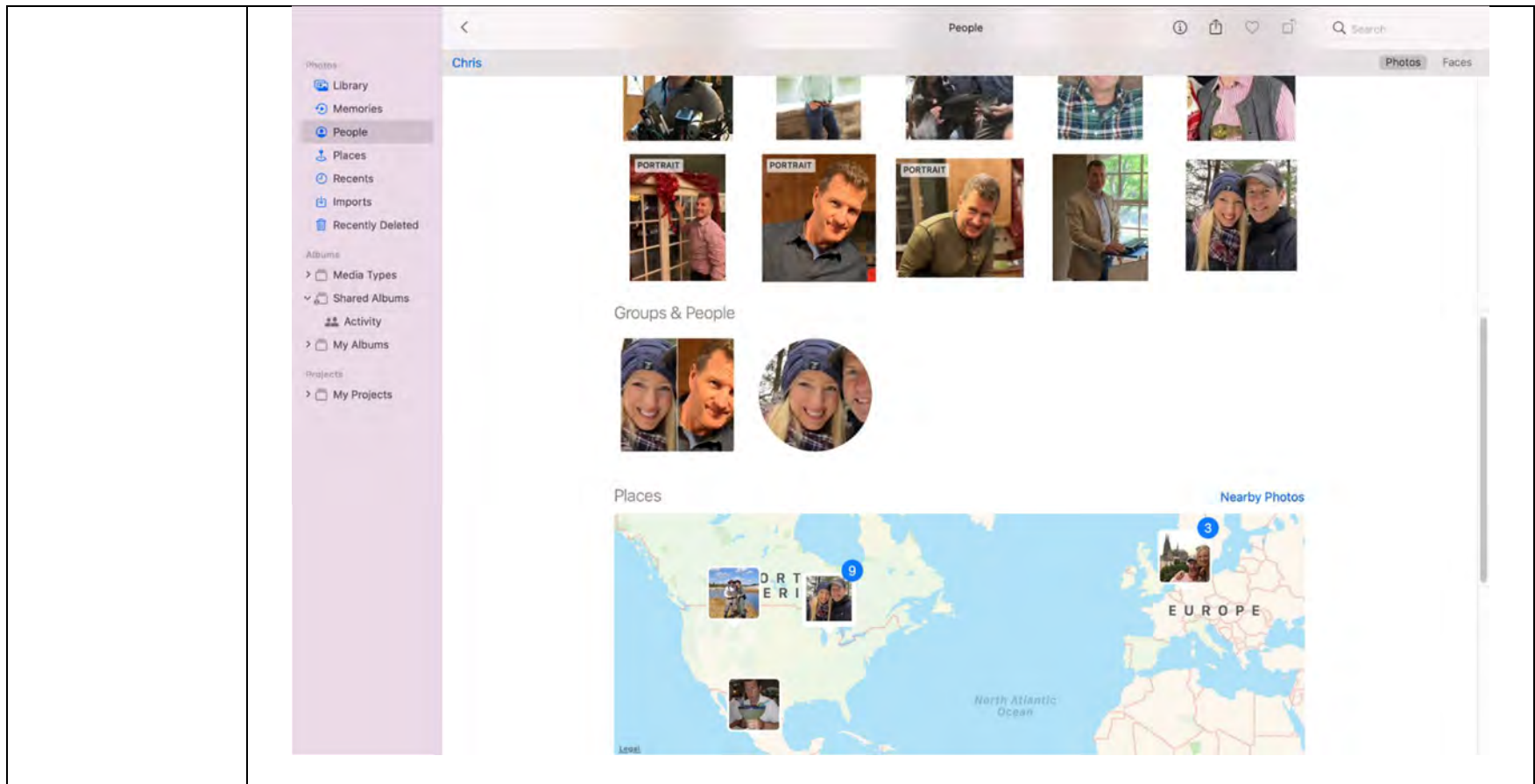
<p><b>1[a][i]</b> a first thumbnail image associated with a first person,  <b>1[a][ii]</b> a first name associated with the first person,  <b>1[a][iii]</b> a second thumbnail image associated with a second person, and  <b>1[a][iv]</b> a second name associated with the second person;</p>	<p>The people view includes (1) a first thumbnail image associated with a first person, (2) a first name associated with the first person, (3) a second thumbnail image associated with a second person, and (4) a second name associated with the second person.</p> 
<p><b>1[b]</b> responsive to an input that is indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:</p>	<p>Responsive to an input that is indicative of a selection associated with the first person (e.g., tapping the first thumbnail image in the people view), macOS causes a first person view to be displayed on the interface.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



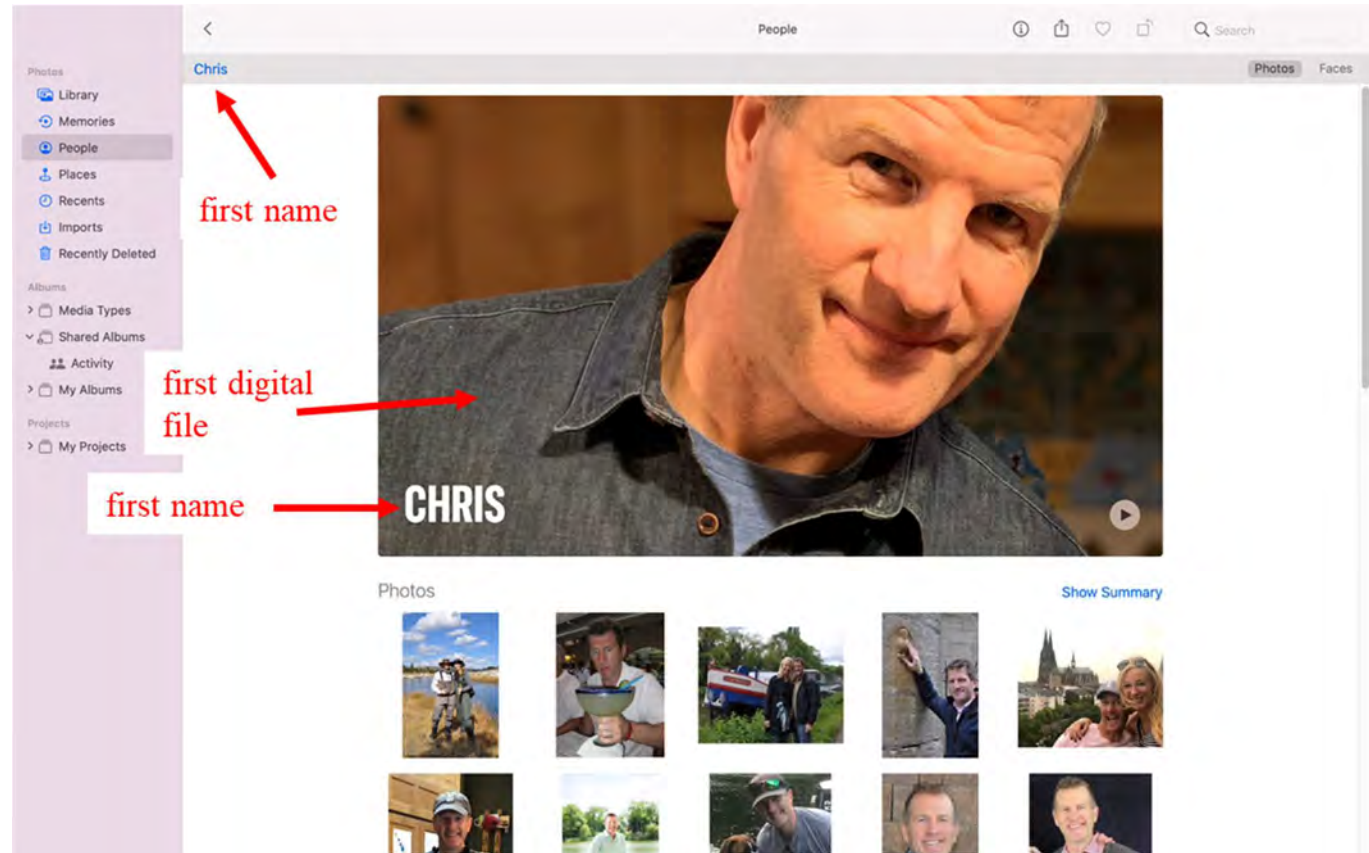


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



**1[b](i)** a first digital file associated with the first person, **1[b](ii)** the first name associated with the first person, and

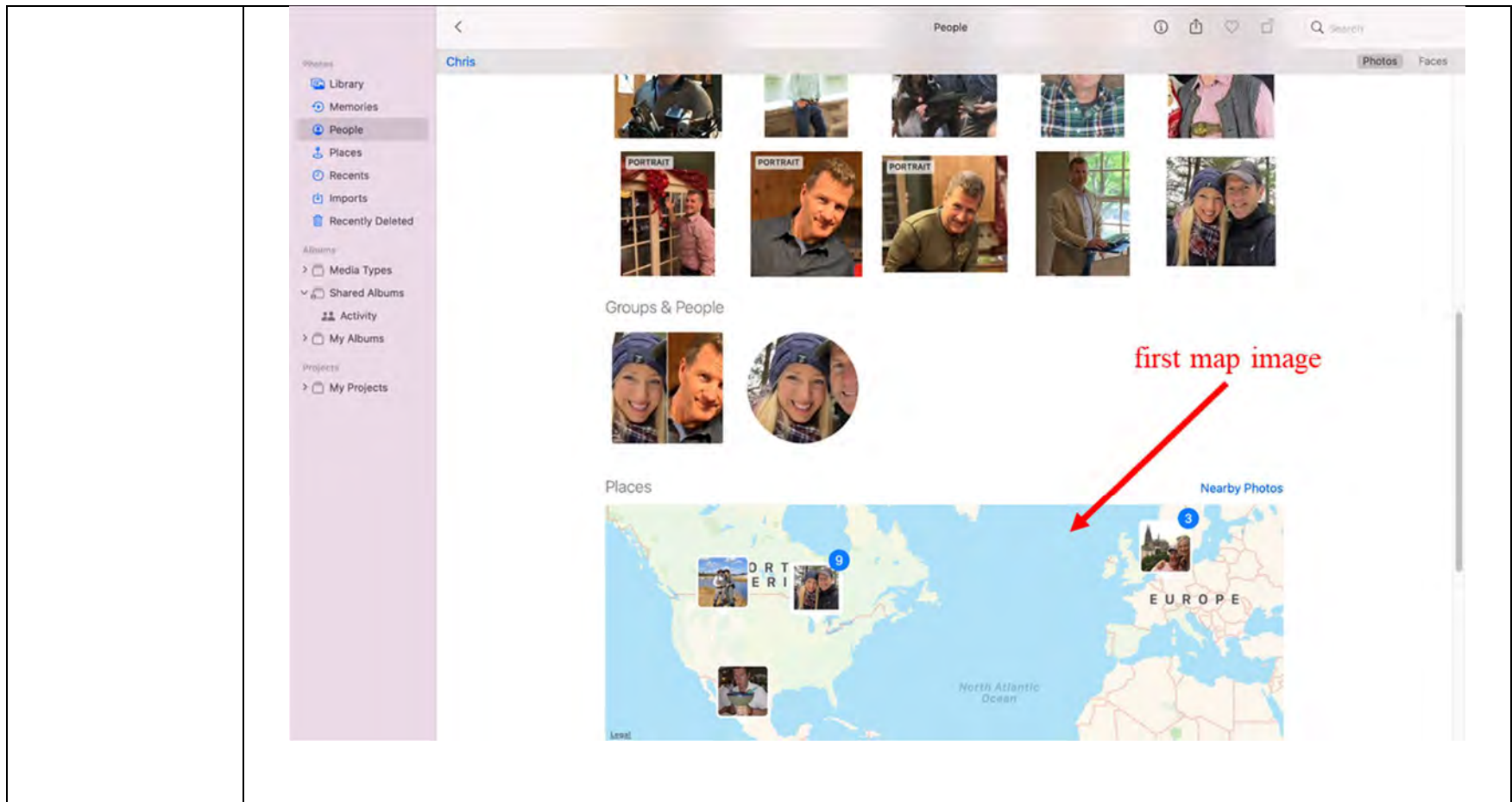
The first person view includes a first digital file associated with the first person and the first name associated with the first person.



**1[b](iii)** a first map image;

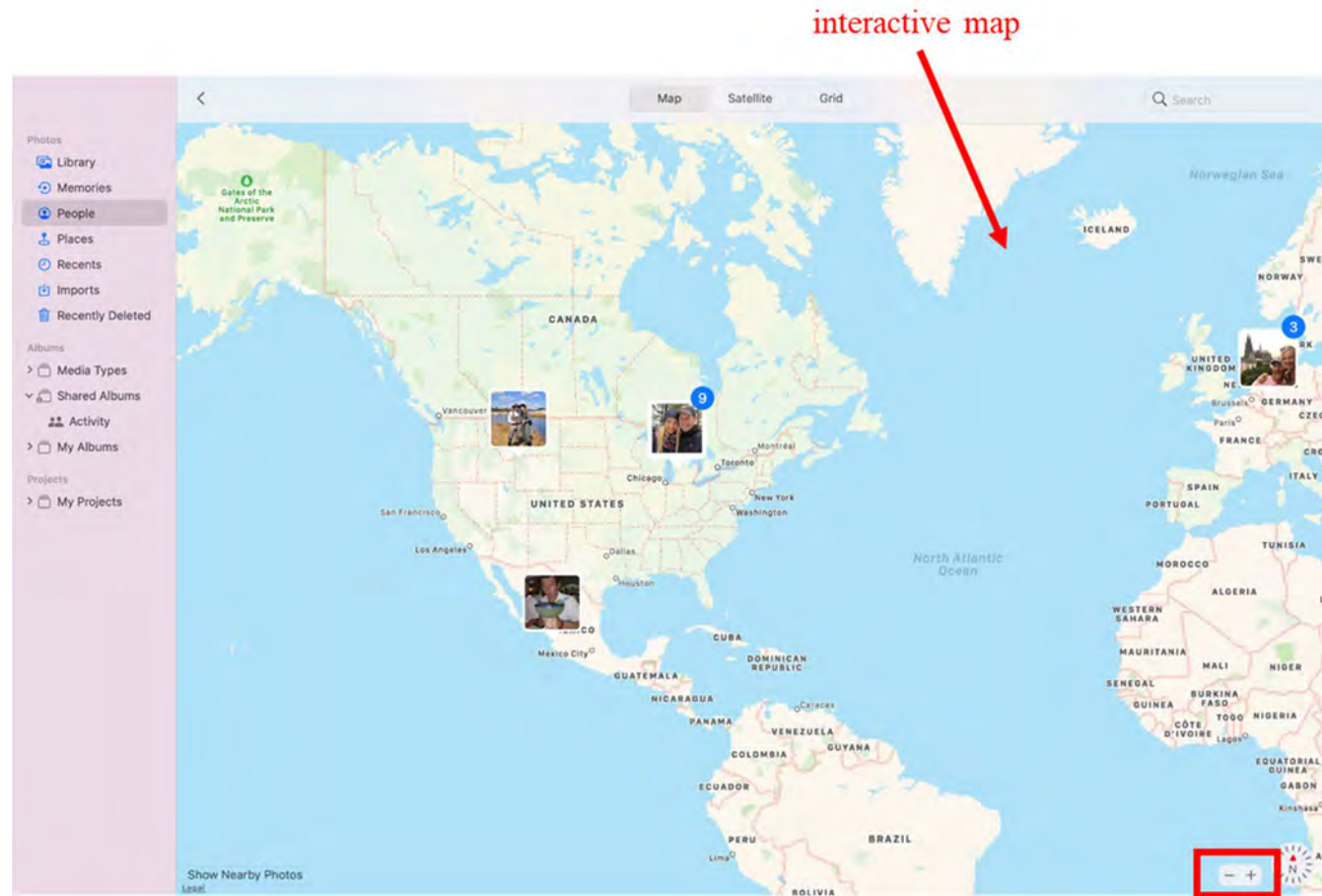
The first person view also includes a first map image.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



**1[c]** responsive to an input that is indicative of a selection of the first map image in the first person view, causing a first location view to be displayed on the interface, the first location view including: **[1][c][i]** an interactive geographic map,

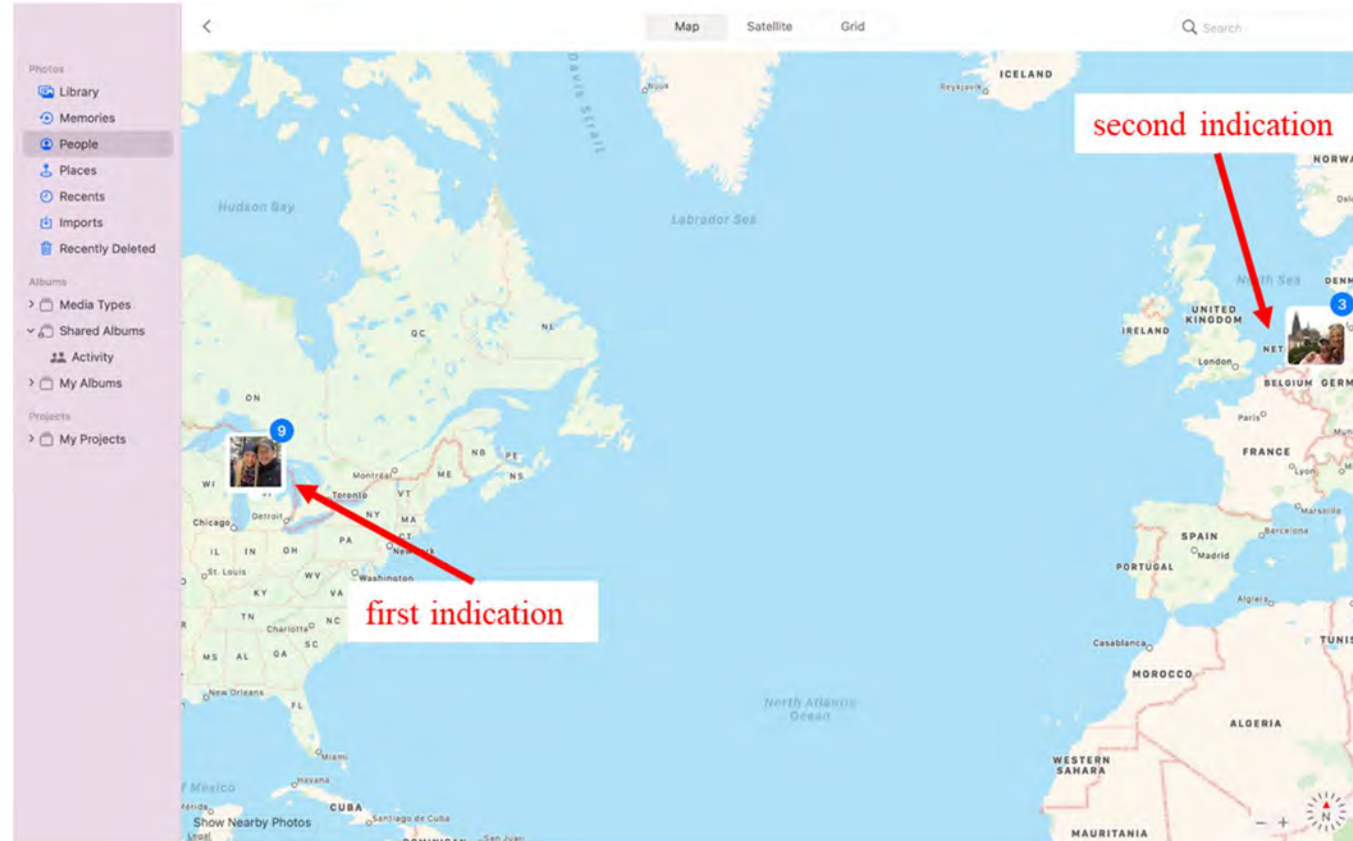
Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), macOS causes a first location view to be displayed on the interface. The first location view includes an interactive geographic map. The geographic is interactive in that macOS can zoom in or out, or move side to side.





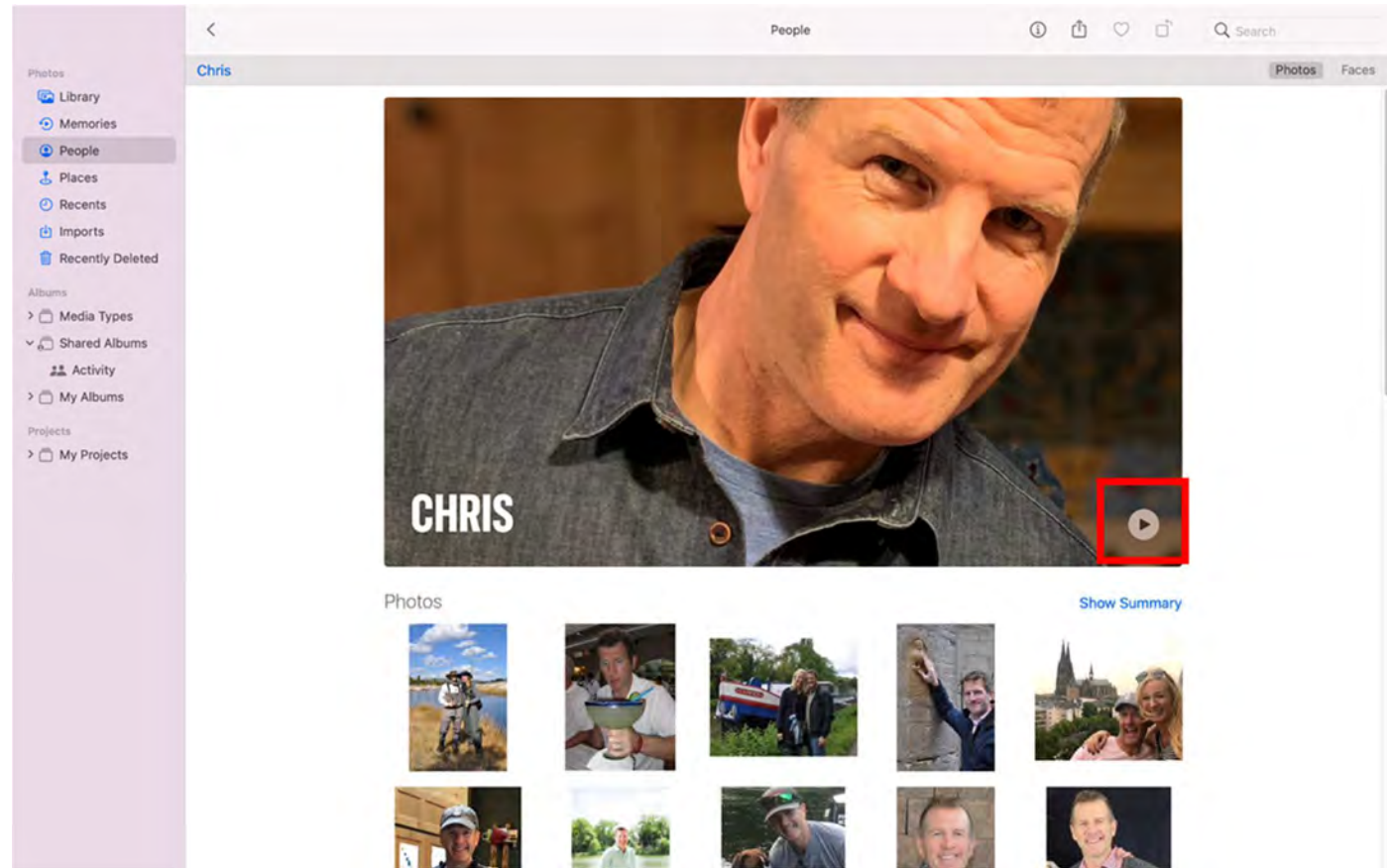
**1[c][ii]**  
a first indication positioned at a first location on the interactive geographic map, and **1[c][iii]**  
a second indication positioned at a second location on the interactive geographic map; and

The first location view includes a first indication positioned at a first location on the interactive geographic map and a second indication positioned at a second location on the interactive geographic map.



**1[d]** responsive to an input that is indicative of a selection of the first digital file in the first person view, causing a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.

Responsive to an input that is indicative of a selection of the first digital file in the first person view (e.g., the “Play” element annotated below), macOS causes a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.

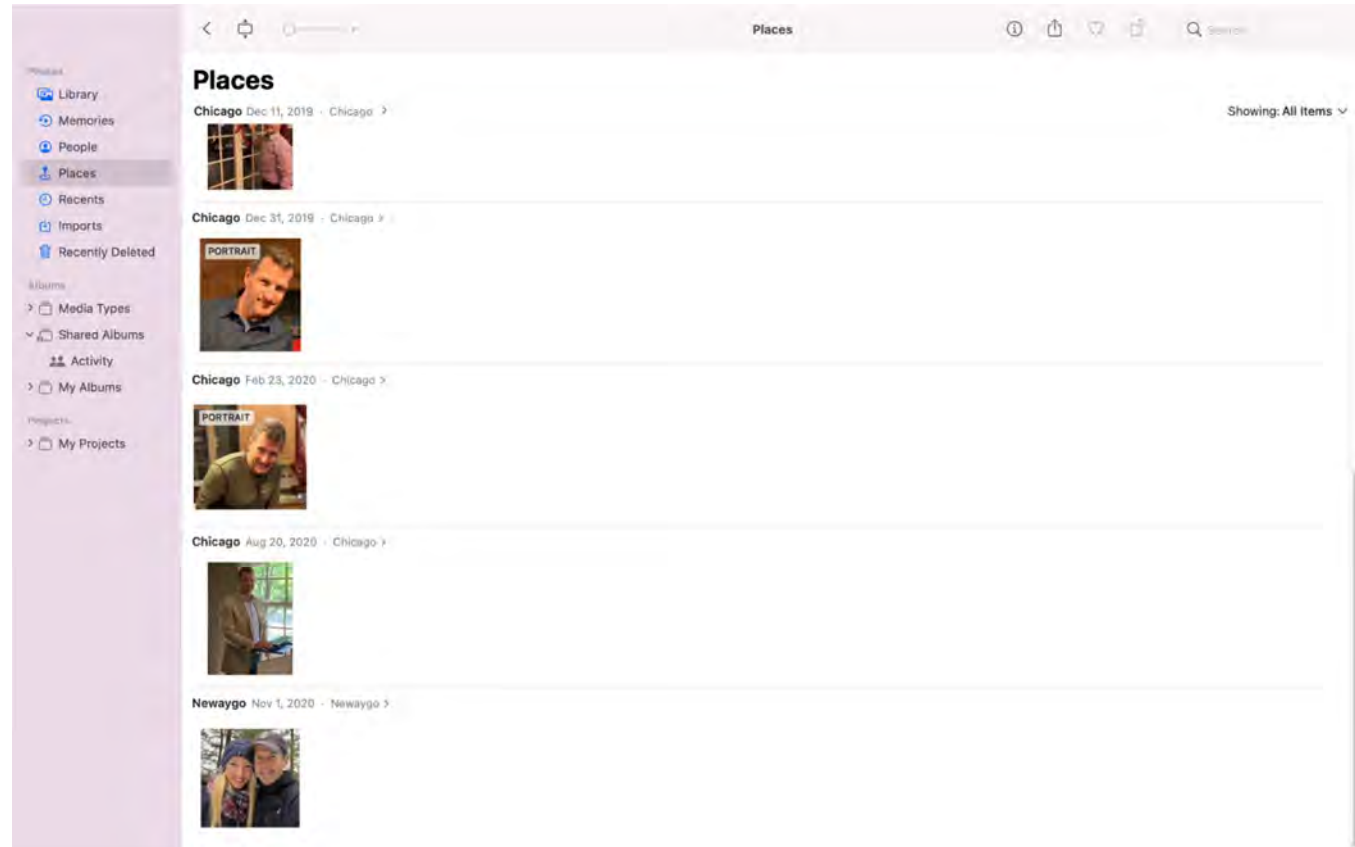


See MW\_Apple\_003186 for an exemplary slideshow.



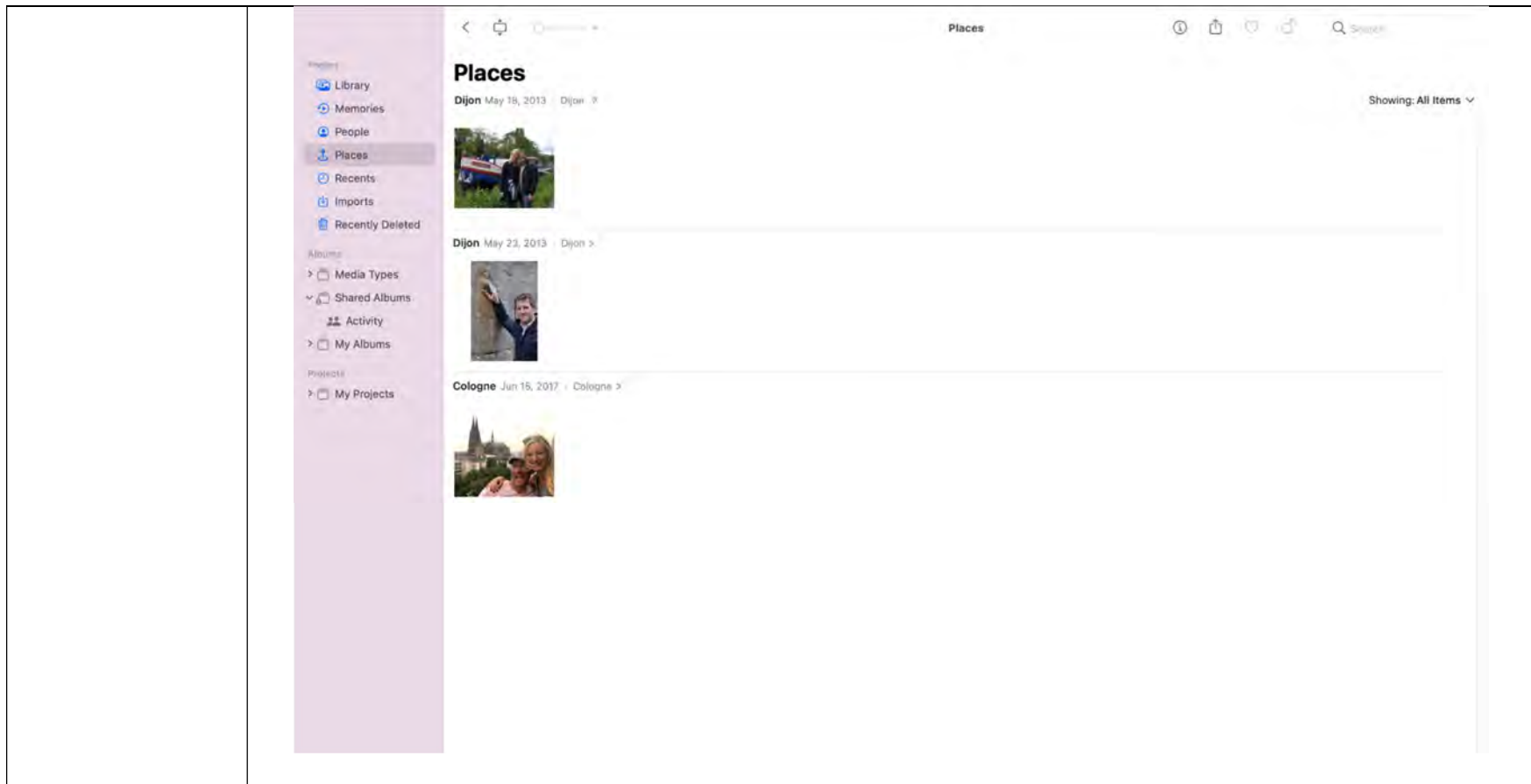
2. The method of claim 1, wherein the first indication is associated with a first set of digital files and the first location, and the second indication is associated with a second set of digital files and the second location.

The first indication is associated with a first set of digital files and the first location. For example, macOS causes the view below to be displayed responsive to a touch/tap of the first indication.



The second indication is associated with a second set of digital files and the second location. For example, macOS causes the view below to be displayed responsive to a touch/tap of the second indication.

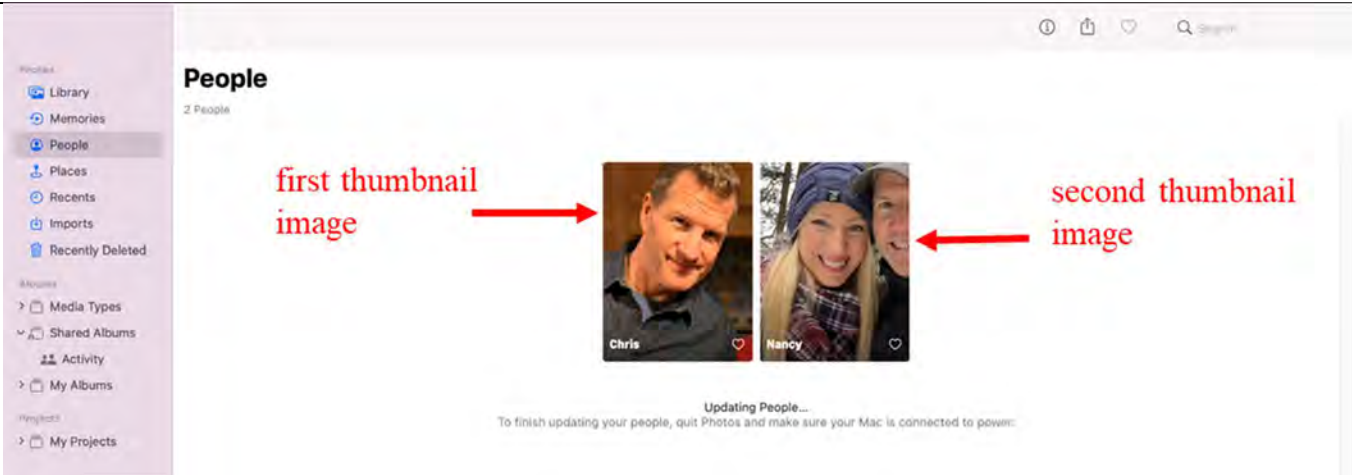
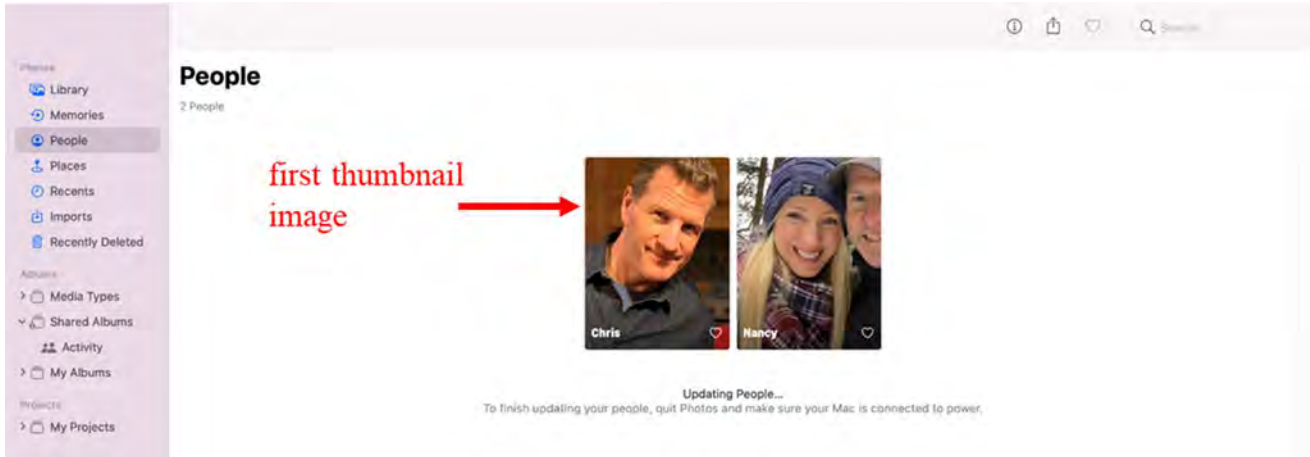
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



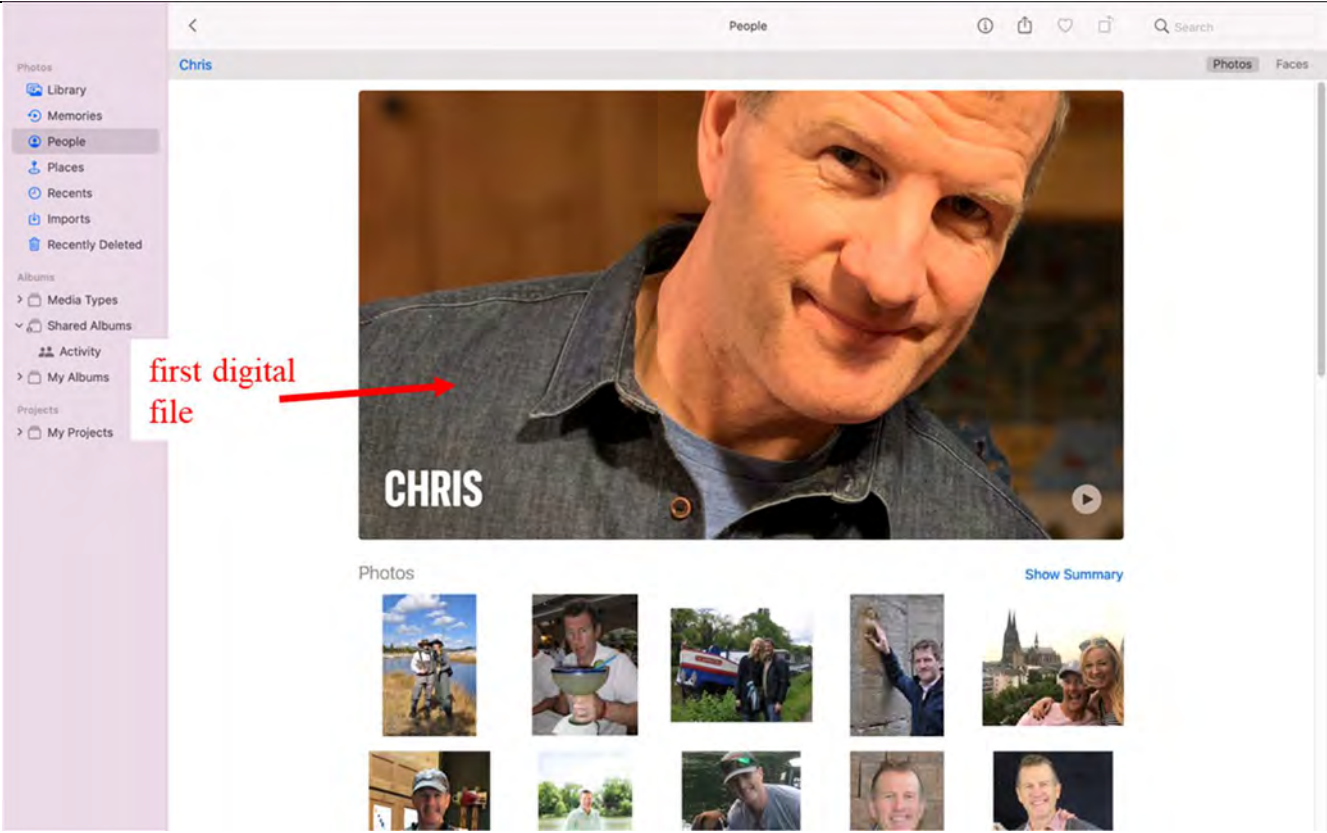
**3.** The method of claim 2, wherein the first set of digital files and the second set of digital files are associated with the first person.

The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first person is included in photographs in the first and second sets of digital files.

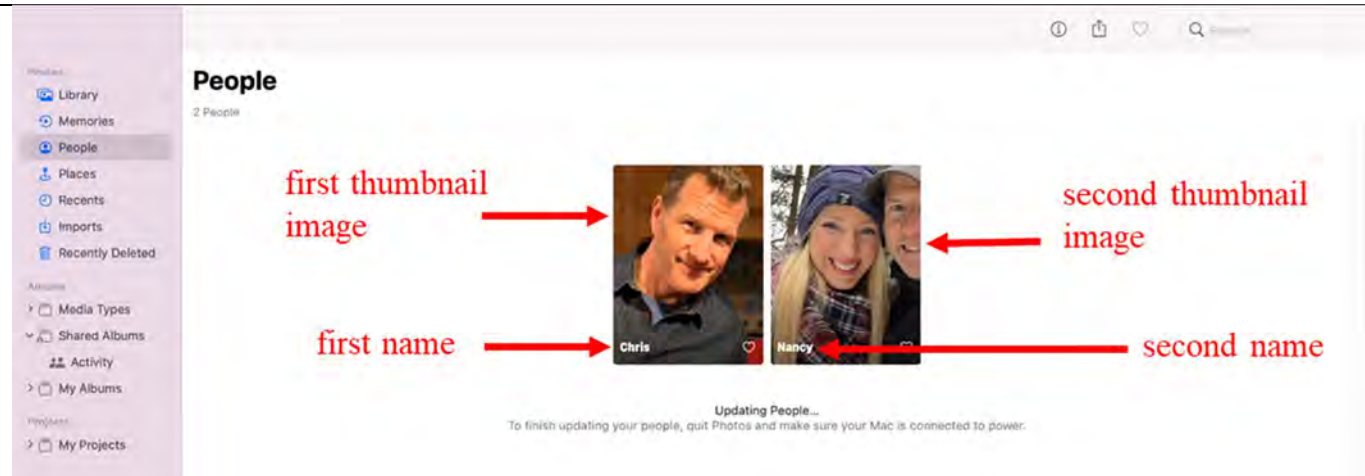
<p><b>4.</b> The method of claim 3, wherein the first thumbnail image includes at least a portion of a face of the first person and the</p>	<p>The first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>

<p>second thumbnail images includes at least a portion of a face of the second person.</p>	
<p>5. The method of claim 4, wherein the first thumbnail image includes at least a portion of the first digital file.</p>	<p>The first thumbnail image in the people view includes at least a portion of the first digital file in the first person view.</p> 

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	 <p>The screenshot shows the macOS Photos app interface in 'People' view. On the left is a sidebar with categories like Photos, Albums, and Projects. The main area displays a large portrait of a man named Chris. Below the portrait is a grid of smaller photo thumbnails. A red arrow points from the text 'first digital file' to the first thumbnail image. The name 'CHRIS' is overlaid on the bottom left of the large portrait. The top of the window shows navigation icons and a search bar.</p>
<p>6. The method of claim 4, wherein, in the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image</p>	<p>In the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image and the second name is displayed adjacent to the second thumbnail image.</p>

and the second name is displayed adjacent to the second thumbnail image.



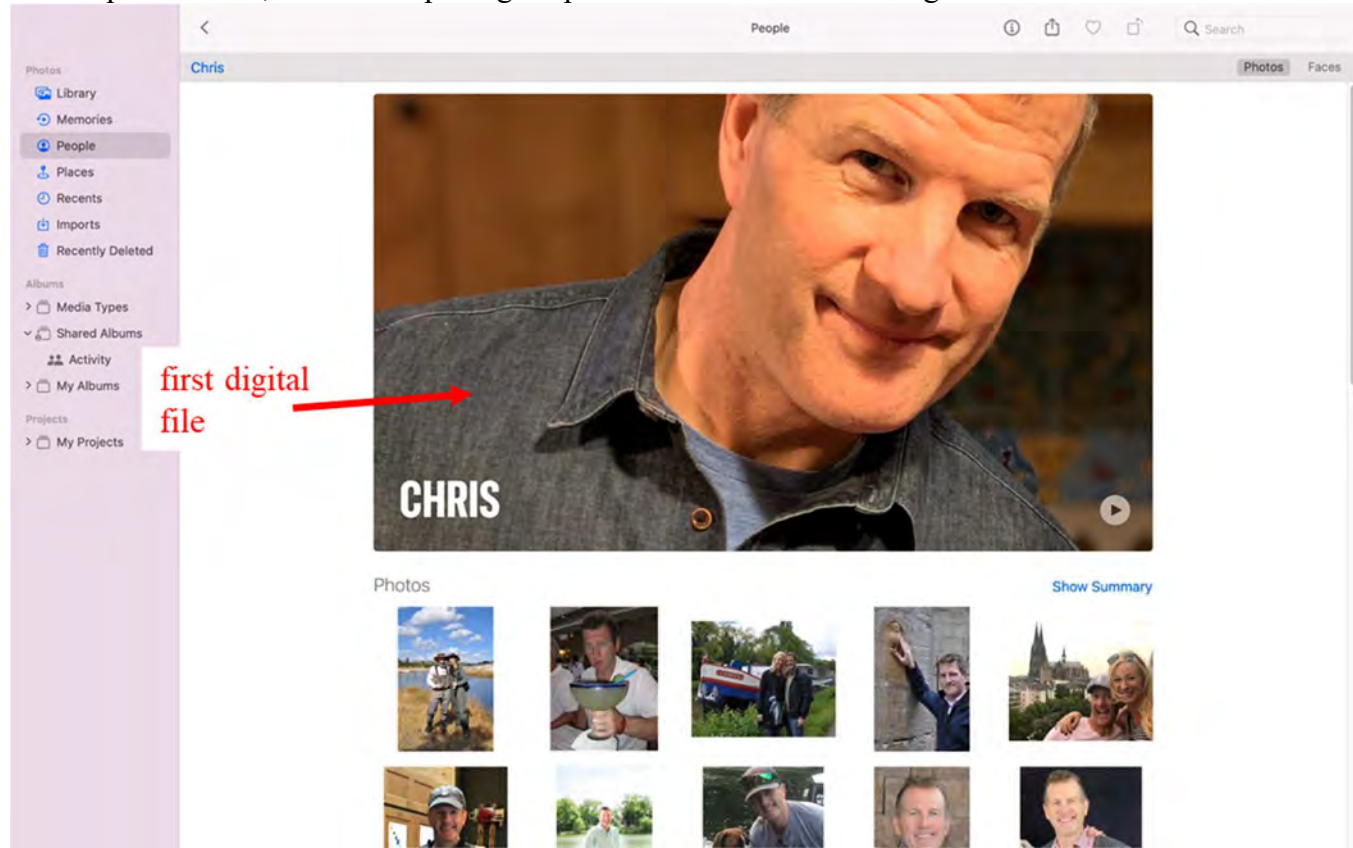
To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate the name of the first person that is associated with the first thumbnail image. The way the claimed displaying performs this function is by displaying the first name in sufficient proximity to the first thumbnail image such that a user will associate the first name with the first thumbnail image. The result of the claimed displaying is that the first name is associated with the first thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name is to communicate the name of the second person that is associated with the second thumbnail image. The way the claimed displaying performs this function is by displaying the second name in sufficient proximity to the second thumbnail image such that a user will associate the second name with the second thumbnail image. The result of the claimed displaying is that the second name is associated with the second thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.



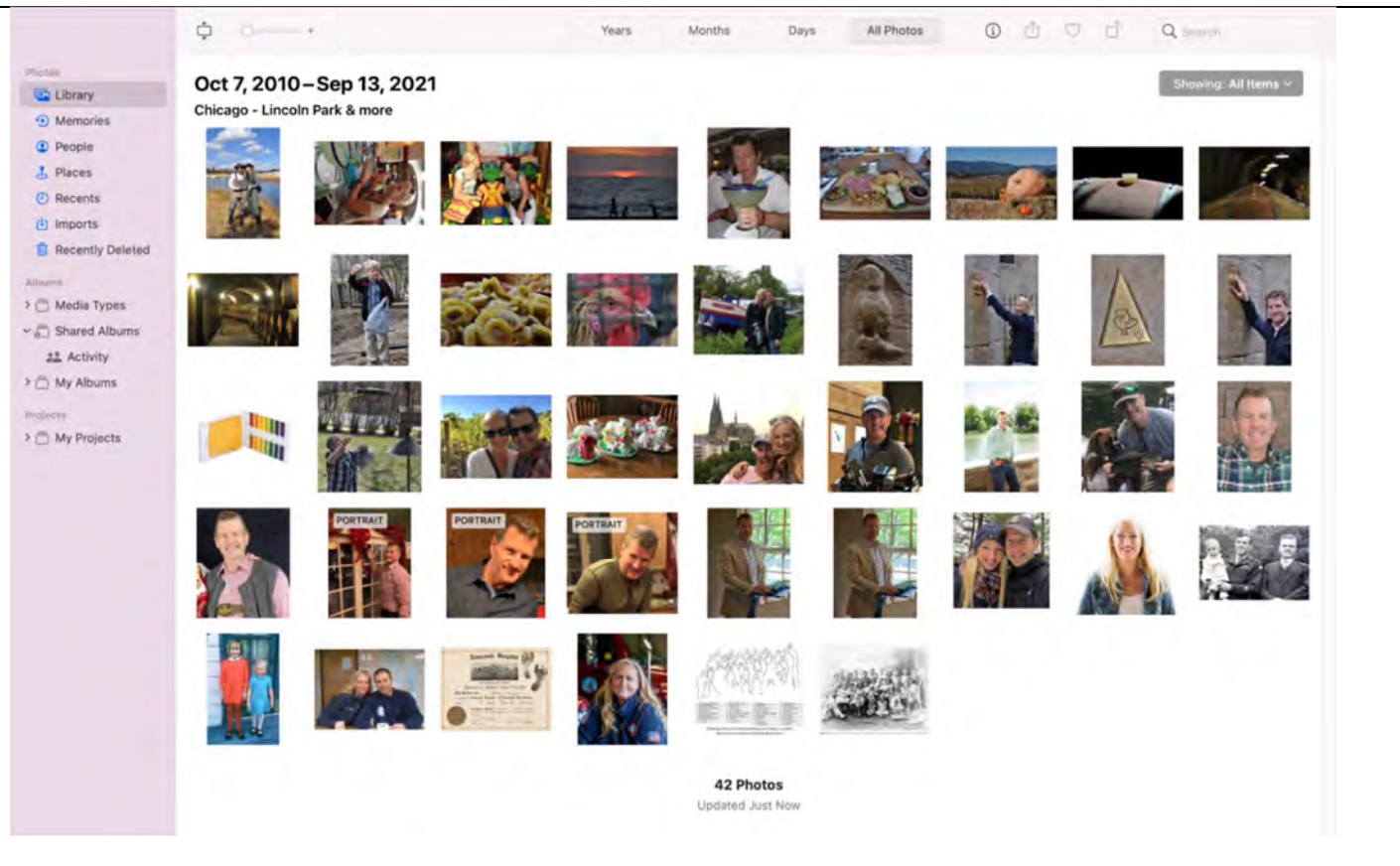
7. The method of claim 6, wherein, in the first person view, the first map image is positioned below the first digital file.

In the first person view, the first map image is positioned below the first digital file.

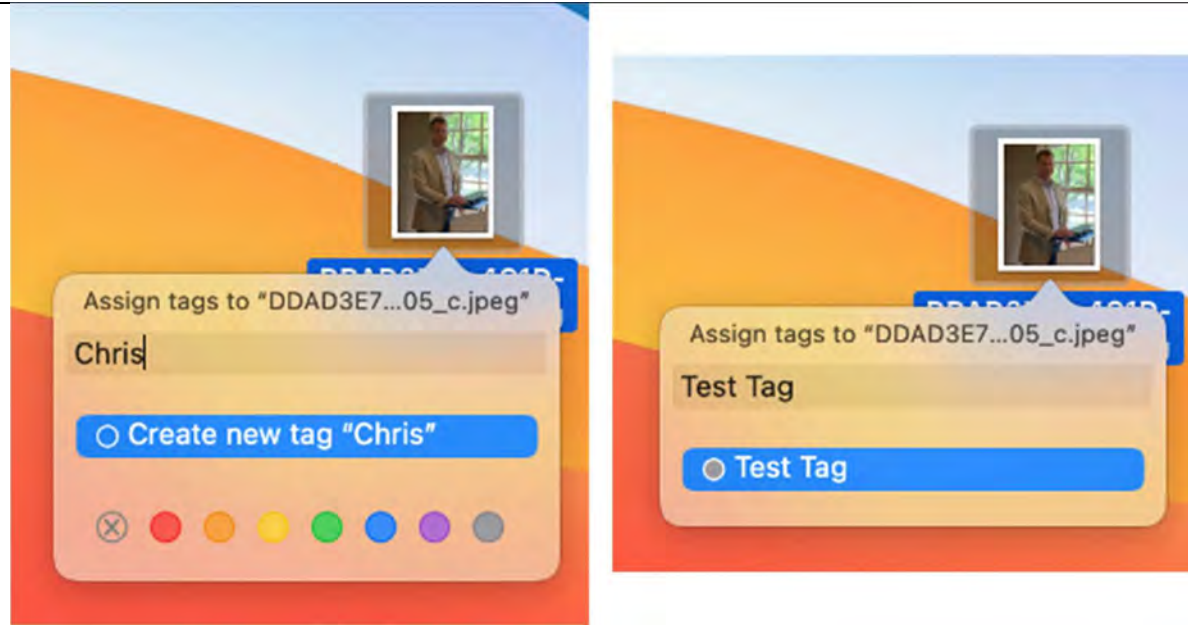


	<p>The screenshot shows the macOS Photos app interface in the 'People' view for a contact named 'Chris'. On the left is a sidebar with navigation options like Library, Memories, People, Places, Recents, Imports, Recently Deleted, Albums, Media Types, Shared Albums, Activity, My Albums, Projects, and My Projects. The main area displays a grid of photos, a 'Groups &amp; People' section with circular avatars, and a 'Places' section with a map. A red arrow points to a small photo icon on the map, labeled 'first map image'.</p>
<p><b>8.</b> The method of claim 1, further comprising, prior to the causing the interface to display the people view:</p>	<p><i>See</i> information for claim 1.</p>
<p><b>8[a]</b> causing the first digital file to</p>	<p>Prior to the causing the interface to display the people view, macOS causes the first digital file to be displayed on the interface.</p>

be displayed on the interface;

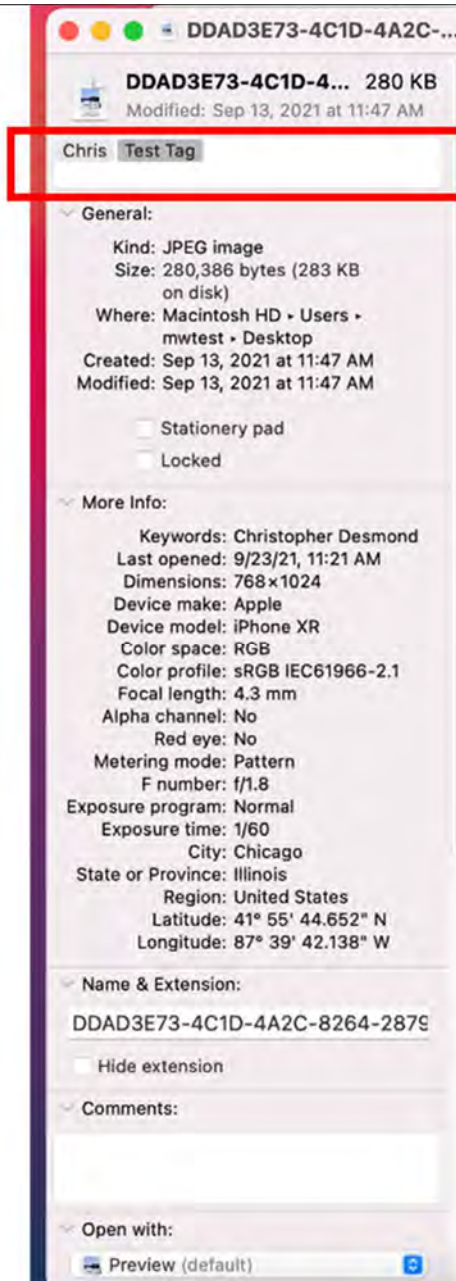
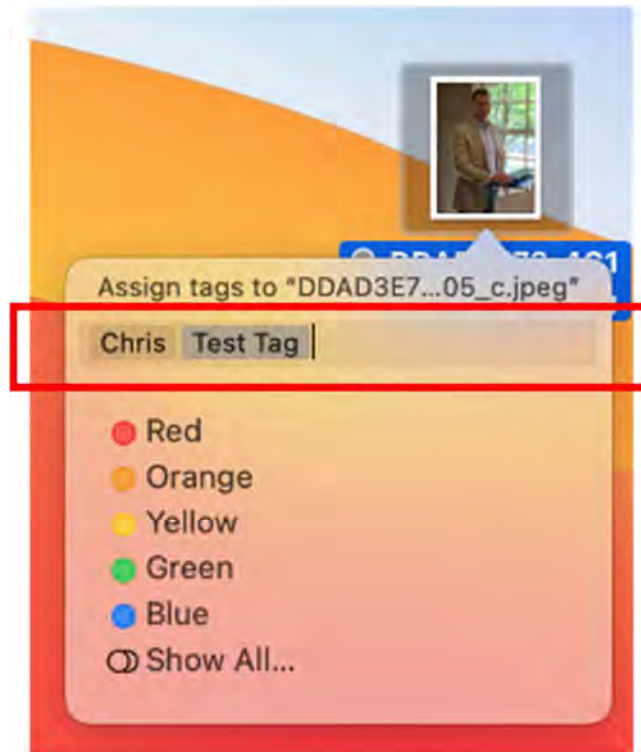


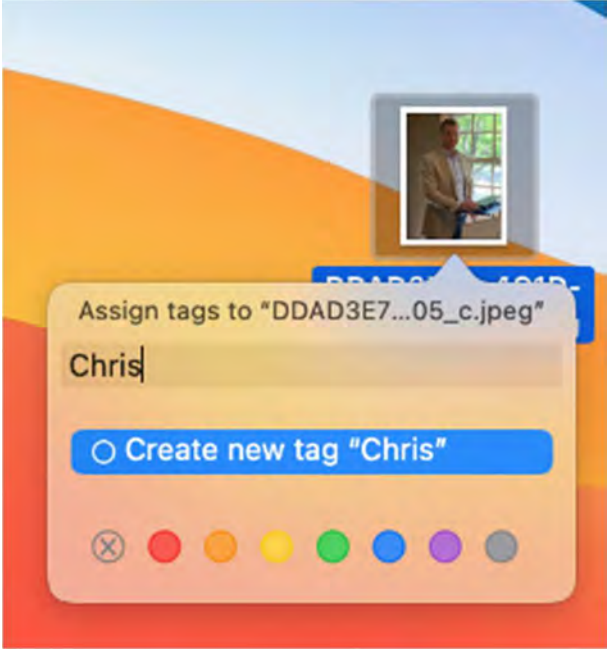
8[b] receiving alphanumeric text as a first user-generated tag; and






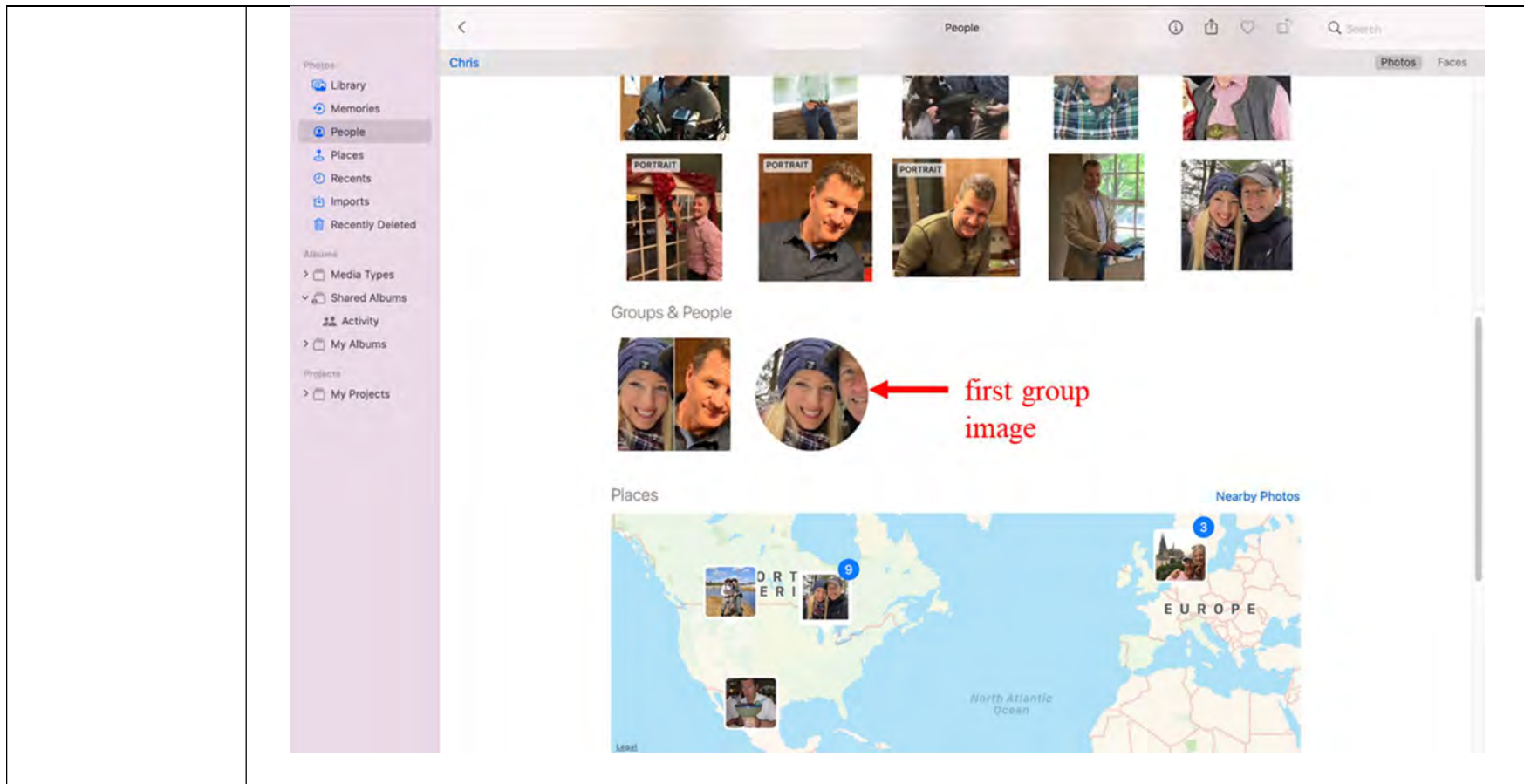
8[c] associating the first digital file with the first user-generated tag.



<p><b>9.</b> The method of claim 8, wherein the first user-generated tag includes the name of the first person.</p>	<p>The first user-generated tag includes the name of the first person.</p>  <p>The image shows a macOS file dialog window titled "Assign tags to 'DDAD3E7...05_c.jpeg'". The dialog has a text input field containing the name "Chris". Below the input field is a blue button with a radio button icon and the text "Create new tag 'Chris'". At the bottom of the dialog are standard macOS window control buttons: a close button (X), a red button, an orange button, a yellow button, a green button, a blue button, a purple button, and a grey button. The background of the dialog is a blurred image of a person in a white shirt standing in front of a window.</p>
<p><b>10.</b> The method of claim 9, further comprising exporting the first digital file to a remote device, the exported first digital file including information associated with the</p>	<p>macOS exports the first digital file to a remote device, and the exported first digital file includes information associated with the first user-generated tag. For example, macOS can export the first digital file to a remote device such as an Apple iPhone (e.g., via AirDrop). Information associated with the first user-generated tag is exported to the iPhone, as shown below.</p>

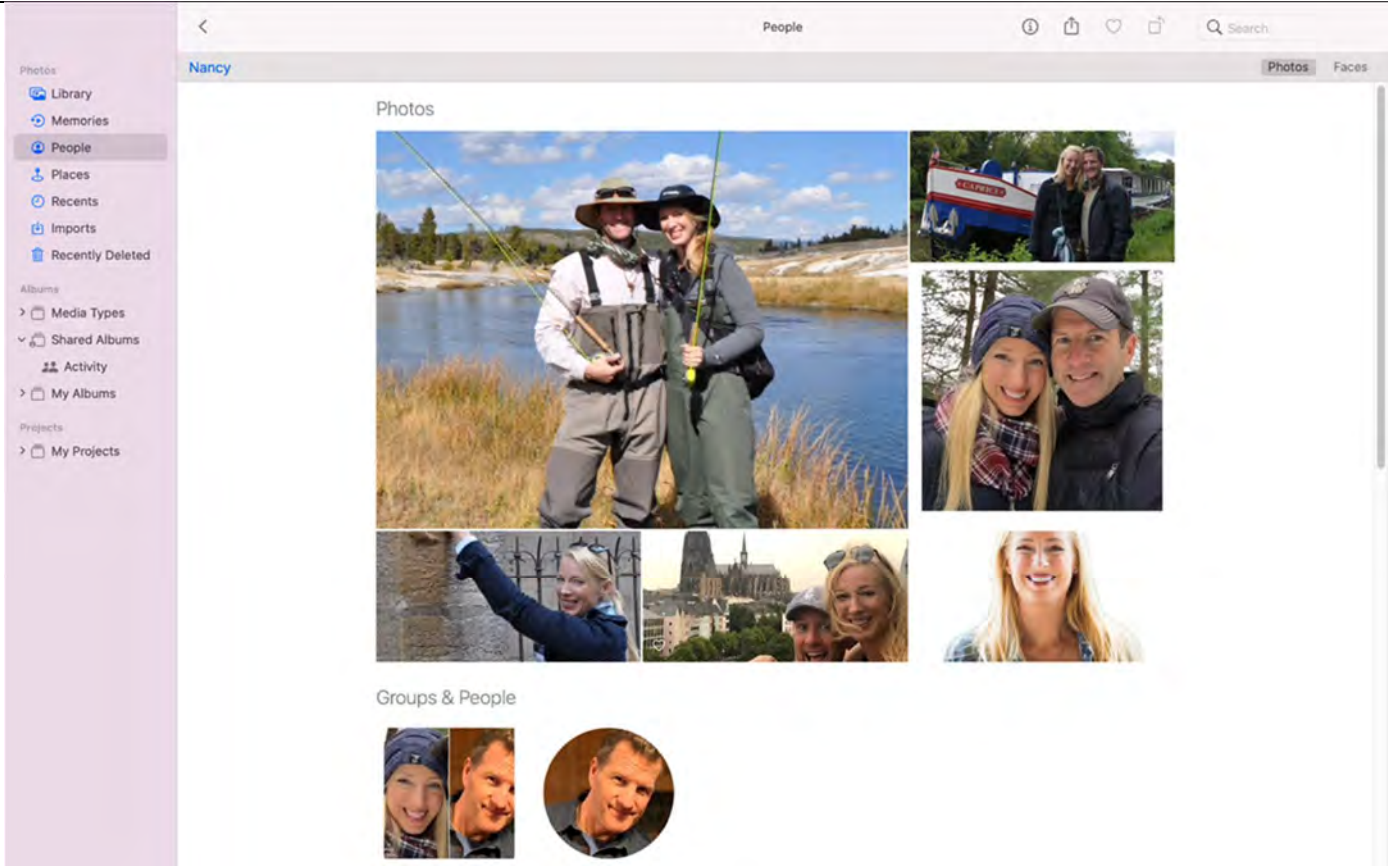


<p>first user-generated tag.</p>	 <p>The screenshot shows the 'Info' page for a photo on an iPhone. The camera settings listed are: iPhone XR back camera 4.25mm f/1.8, Aperture value 1.696, Exposure time 1/60, Exposure program Normal, Focal length 4.3 mm, ISO speed 80, Flash NO, Ref eye NO, f Number f/1.8, Metering mode Pattern, White balance Auto, Content Creator 13.6, Longitude 87° 39' 42.144" W, and Latitude 41° 55' 44.653" N. At the bottom, there is a 'Tags' section with an 'Add Tags' button and a tag labeled 'Chris Test Tag' which is highlighted with a red rectangular box.</p>
<p><b>11[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>11[a]</b> the first person view includes a first group image, and</p>	<p>The first person view includes a first group image.</p>



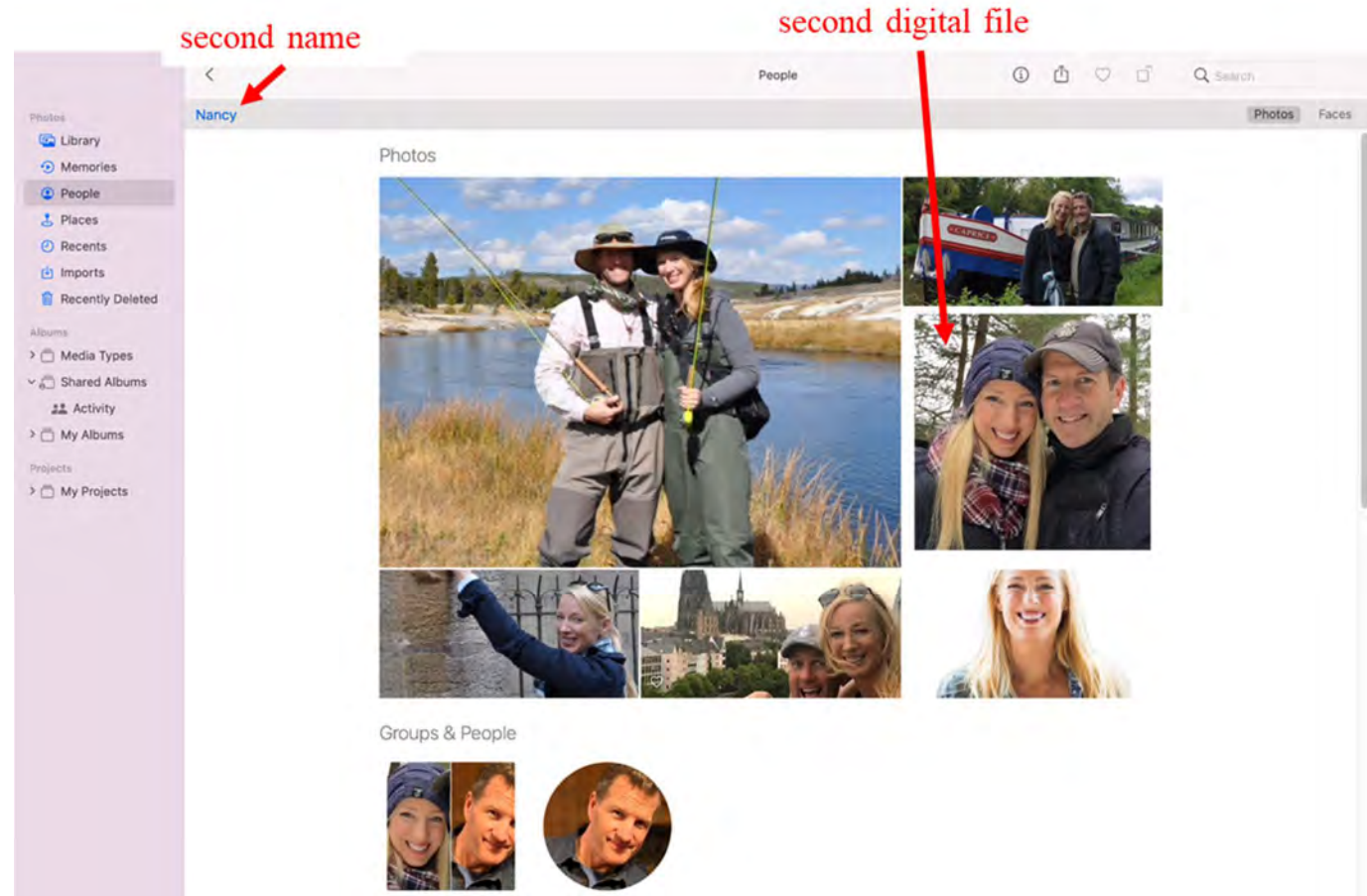
**11[b]** responsive to an input that is indicative of a selection of the first group image, causing a first group view to be displayed on the interface, the first

Responsive to an input that is indicative of a selection of the first group image (e.g., tapping the first group image), macOS causes a first group view to be displayed on the interface, the first group view including one or more digital files associated with another person that is associated with the first person.

<p>group view including one or more digital files associated with another person that is associated with the first person.</p>	
<p><b>12.</b> The method of claim 11, wherein the another person is the second person.</p>	<p>The another person is the second person. <i>See</i> information for limitations 1[a][iii]-[iv] and claim 11.</p>
<p><b>13.</b> The method of claim 3, further</p>	<p>Responsive to an input that is indicative of a selection associated with the second person, macOS causes a second person view to be displayed on the interface, the second person view including the second digital file</p>

comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.

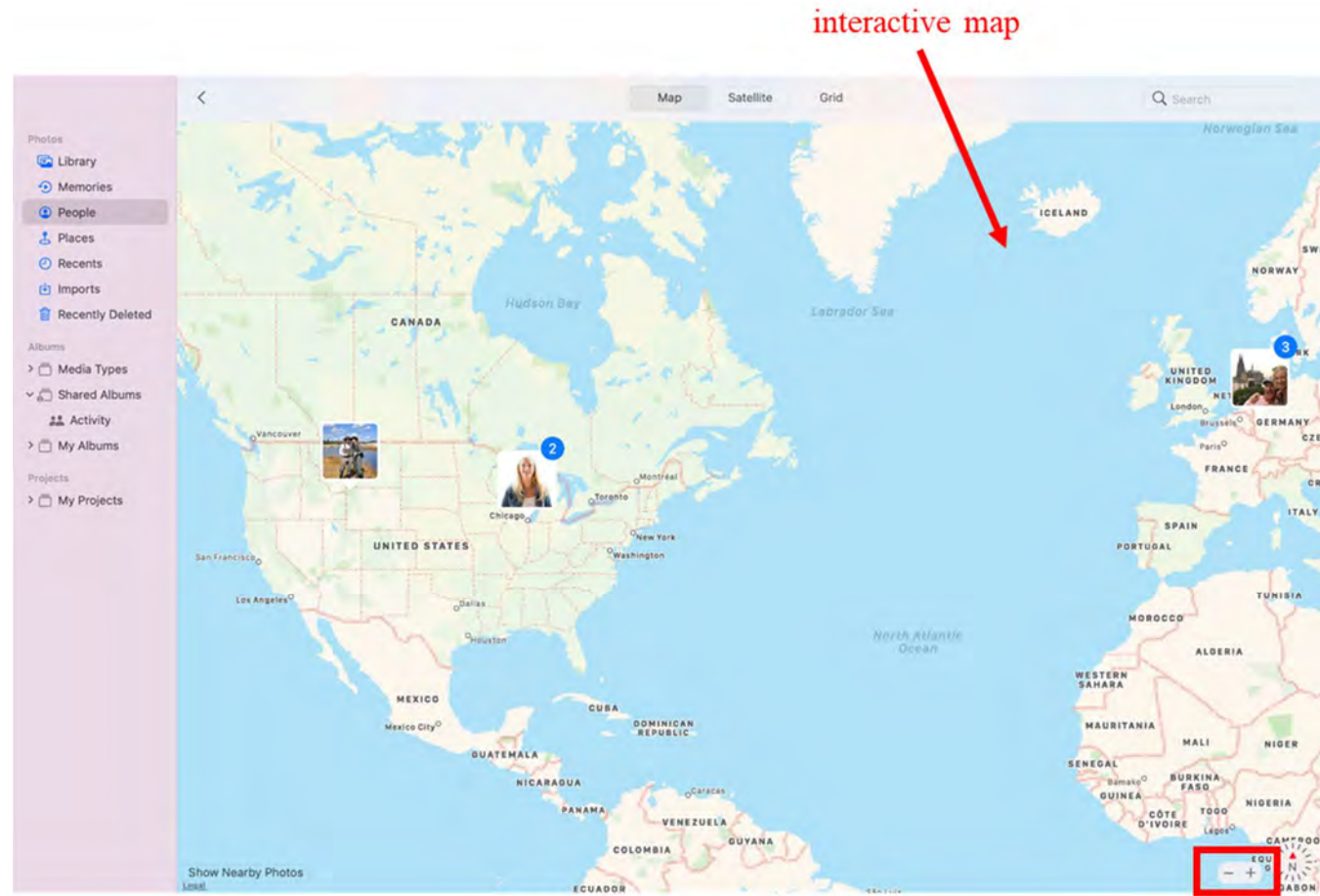
associated with the second person, the second name associated with the second person, and a second map image.



	<p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with navigation options like Library, Memories, People, Places, Recents, Imports, and Recently Deleted. The main area is titled 'People' and shows a contact named 'Nancy'. Below the name is a grid of photos. Underneath is a 'Groups &amp; People' section with circular profile pictures. At the bottom is a 'Places' section with a map showing location markers. A red arrow points to the name 'Nancy' with the label 'second name'. Another red arrow points to a location marker on the map with the label 'second map image'.</p>
<p><b>14[pre]</b> The method of claim 13, further comprising:</p>	<p>See information for claim 13.</p>
<p><b>14[a]</b> responsive to an input that is</p>	<p>Responsive to an input that is indicative of a selection of the second map image in the second person view (e.g., tapping the second map image), macOS causes a second location view to be displayed on the interface.</p>



indicative of a selection of the second map image in the second person view, causing a second location view to be displayed on the interface,

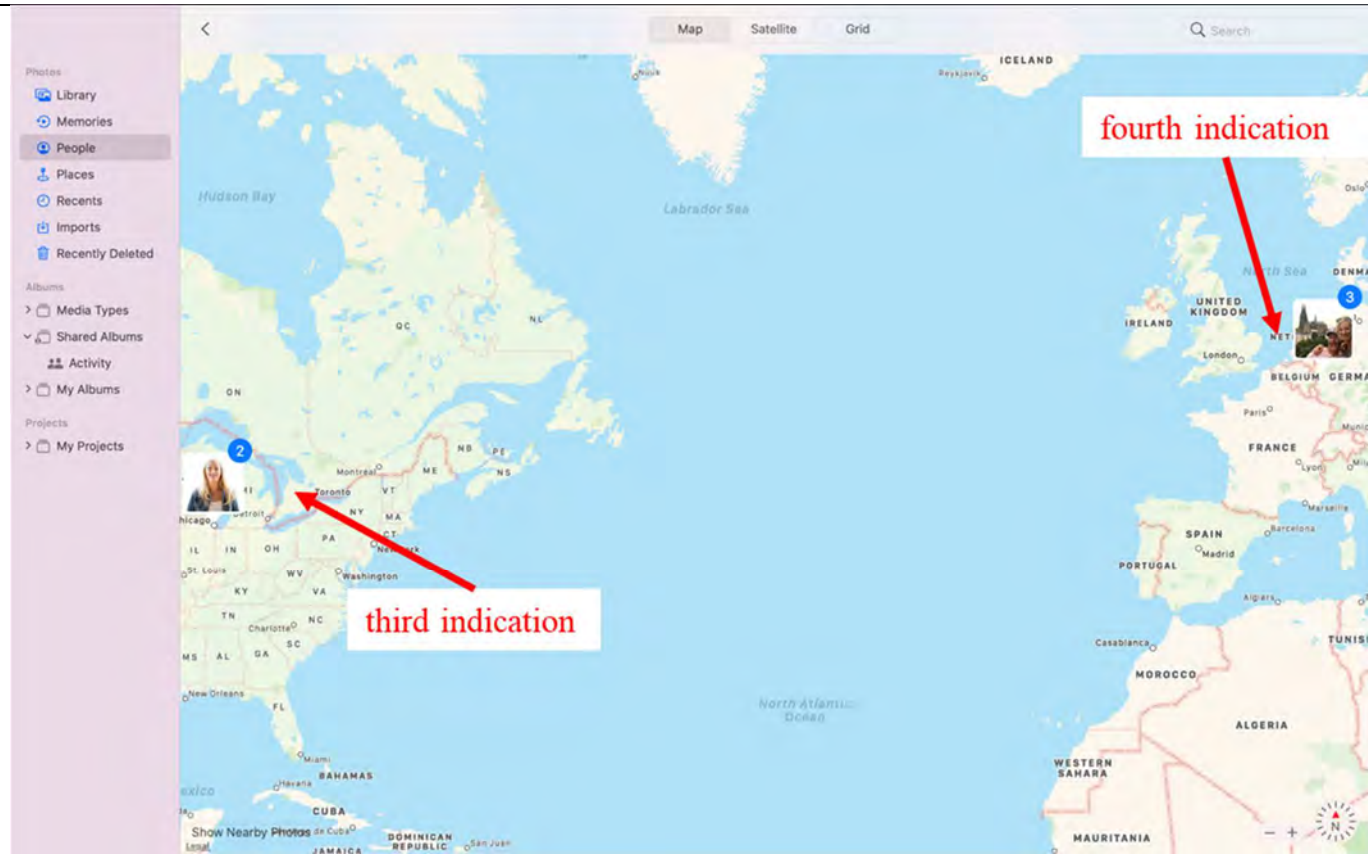


**14[b]** the second location view including: the interactive geographic map, a third indication positioned at a

The second location view includes the interactive geographic map, a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.



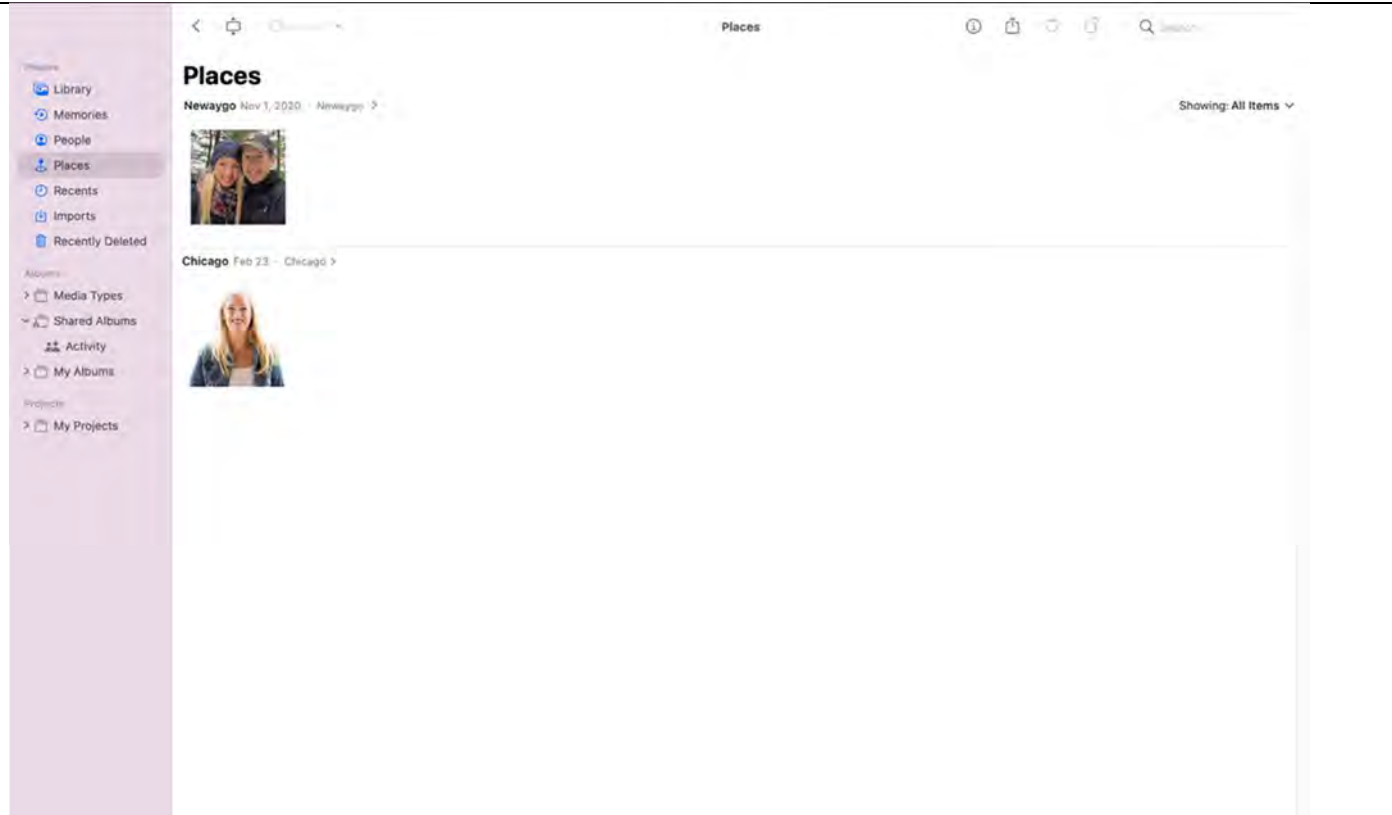
third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.



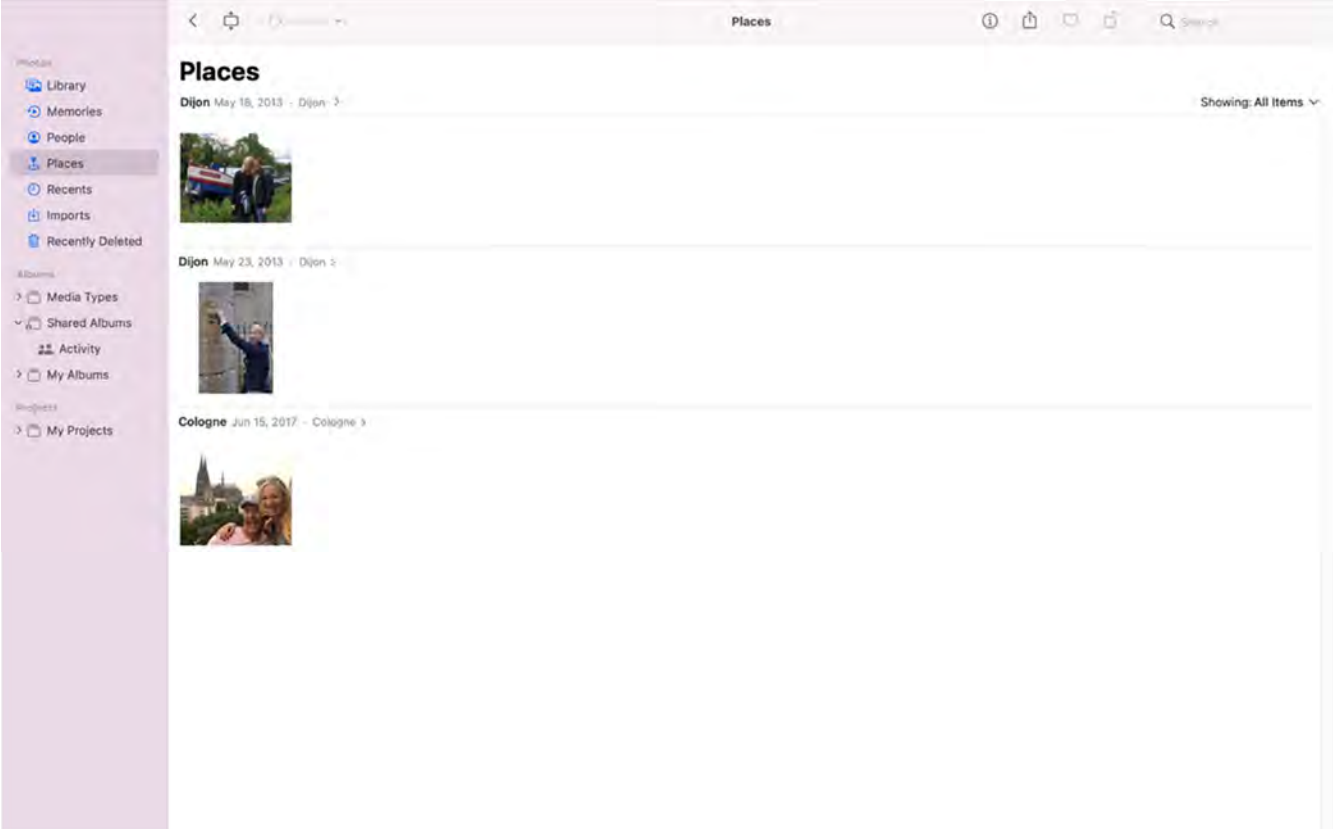
15. The method of claim 14, wherein the third indication is associated with a third set of digital files and the third location, and the fourth

The third indication is associated with a third set of digital files and the third location.

indication is associated with a fourth set of digital files and the fourth location.

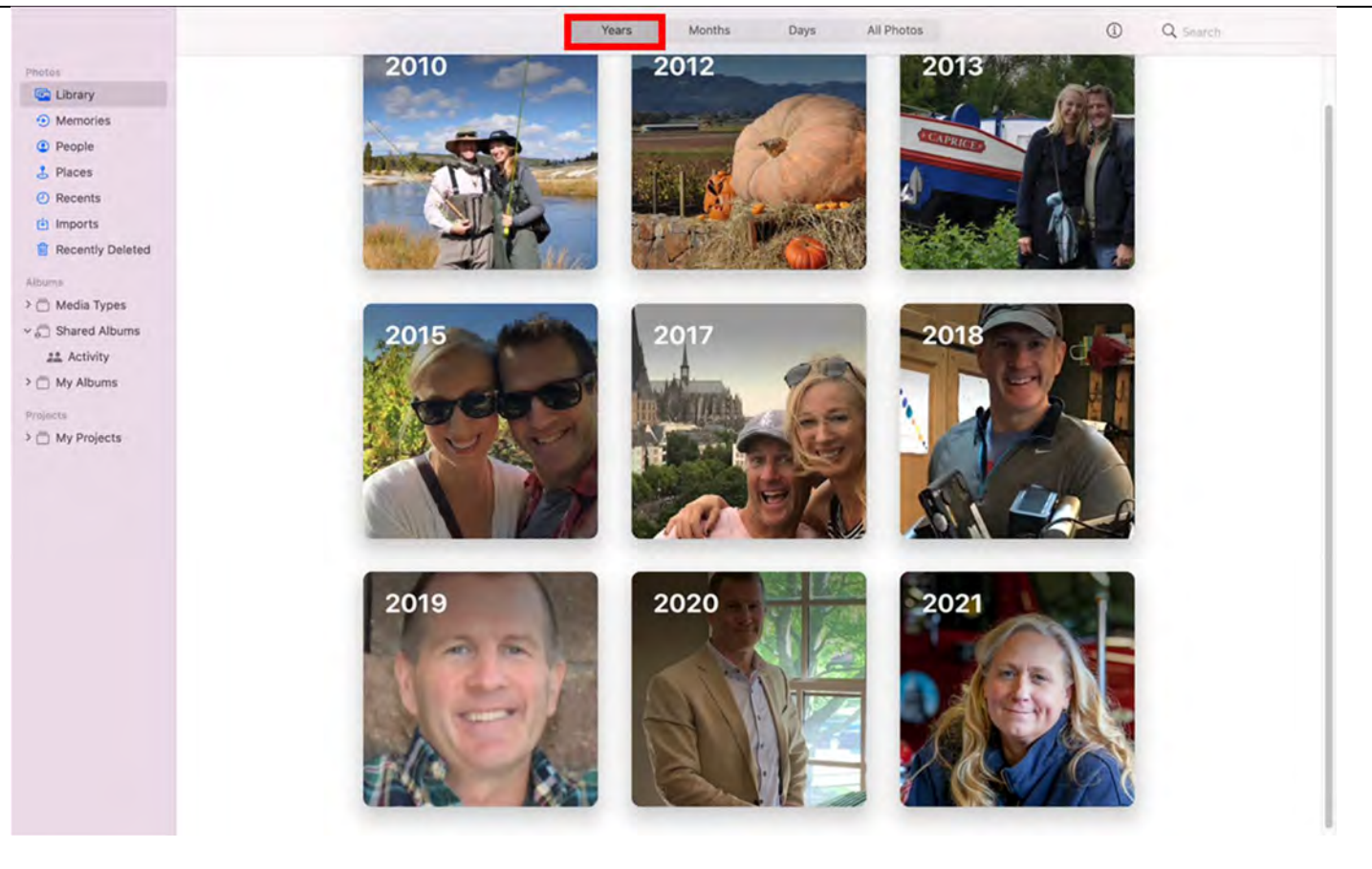


The fourth indication is associated with a fourth set of digital files and the fourth location.

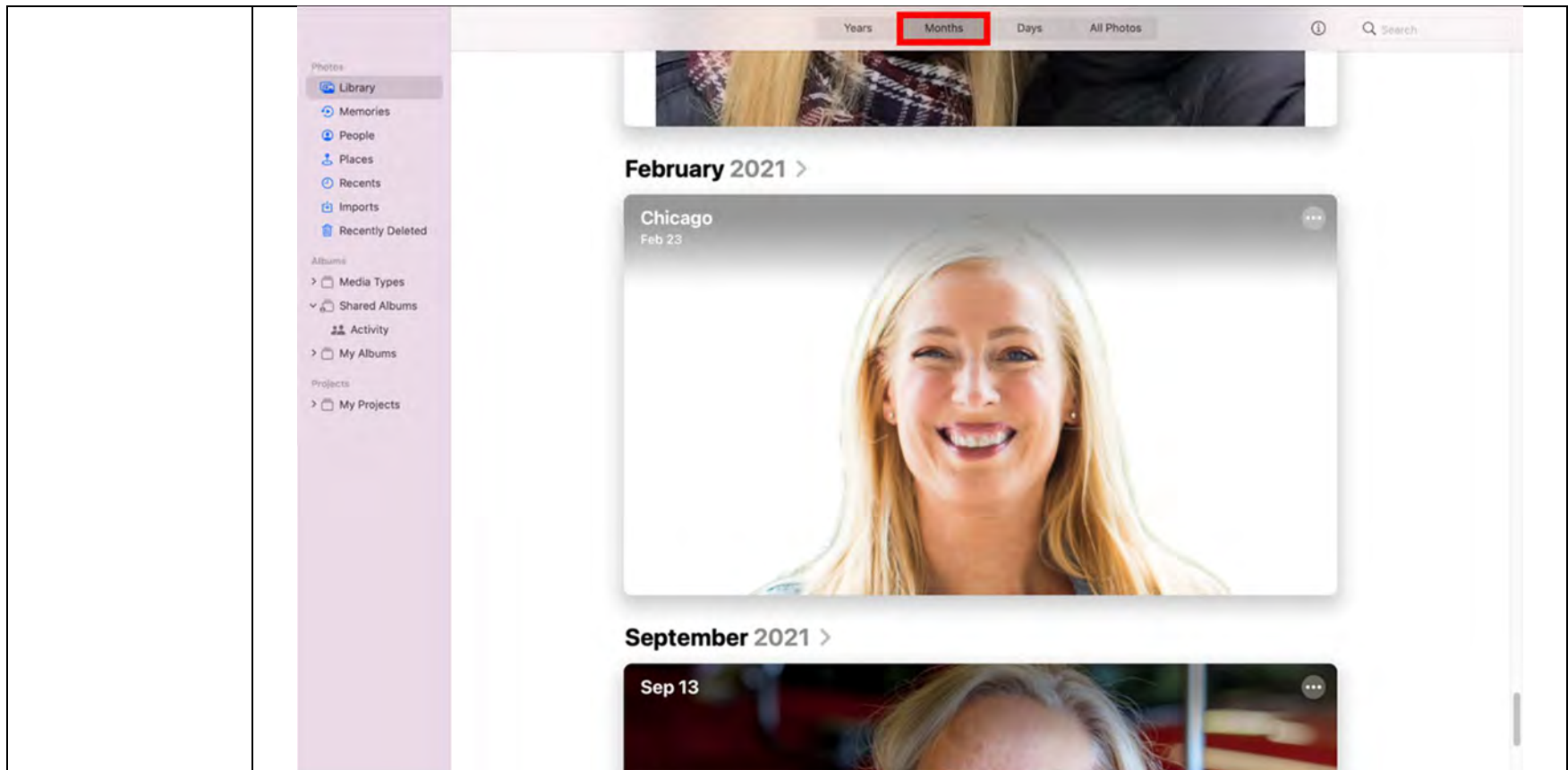
	
<p><b>16.</b> The method of claim 15, wherein the third set of digital files and the fourth set of digital files are associated with the second person.</p>	<p>The third set of digital files and the fourth set of digital files are associated with the second person. As shown below, the second person is included in photographs in the third and fourth sets of digital files.</p>

	
<p><b>17.</b> The method of claim 1, further comprising causing the interface to display an interactive timeline view, the</p>	<p>macOS causes the interface to display an interactive timeline view, the interactive timeline view permitting a user to group a plurality of digital files by year, month, and day.</p>

interactive timeline view permitting a user to group a plurality of digital files by year, month, and day.

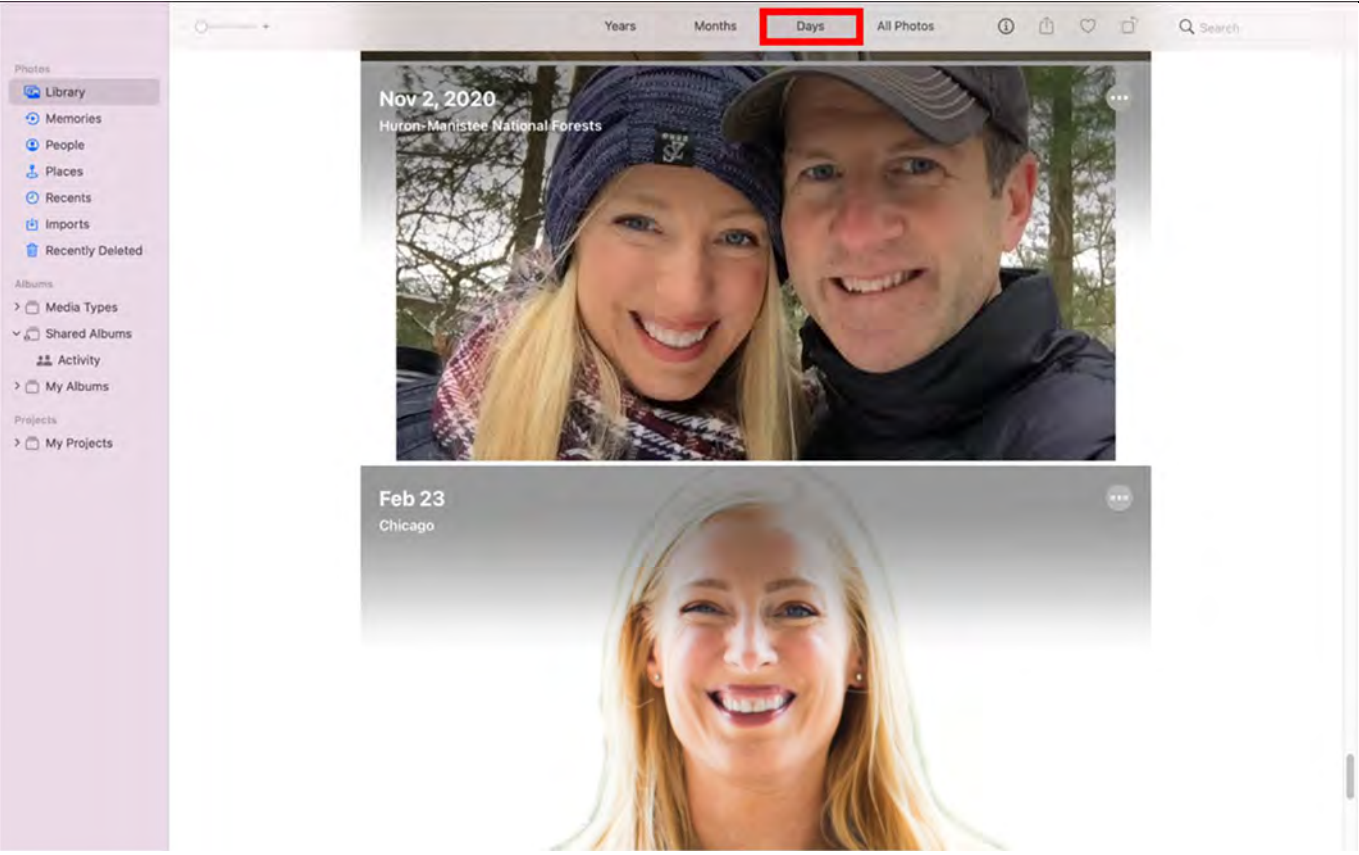


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

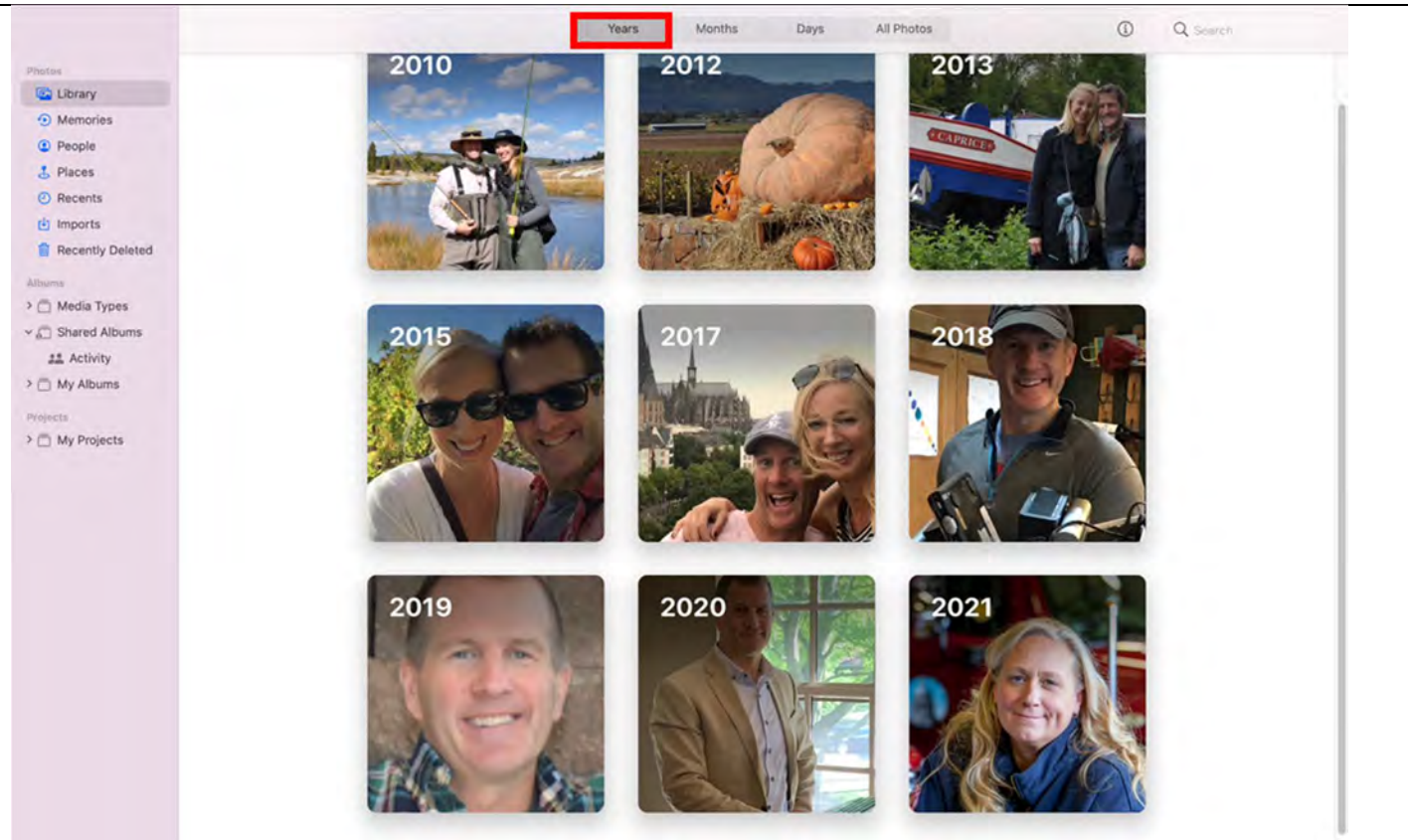




Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	
<p><b>18<pre>pre]</pre></b> The method of claim 17, further comprising:</p>	<p><i>See</i> information for claim 17.</p>
<p><b>18<pre>a]</pre></b> responsive to receiving a year input, grouping the</p>	<p>Responsive to receiving a year input (e.g., tapping the “Years” element), macOS groups the plurality of digital files based on year and causes at least one of the plurality of digital files to be displayed on the interface.</p>

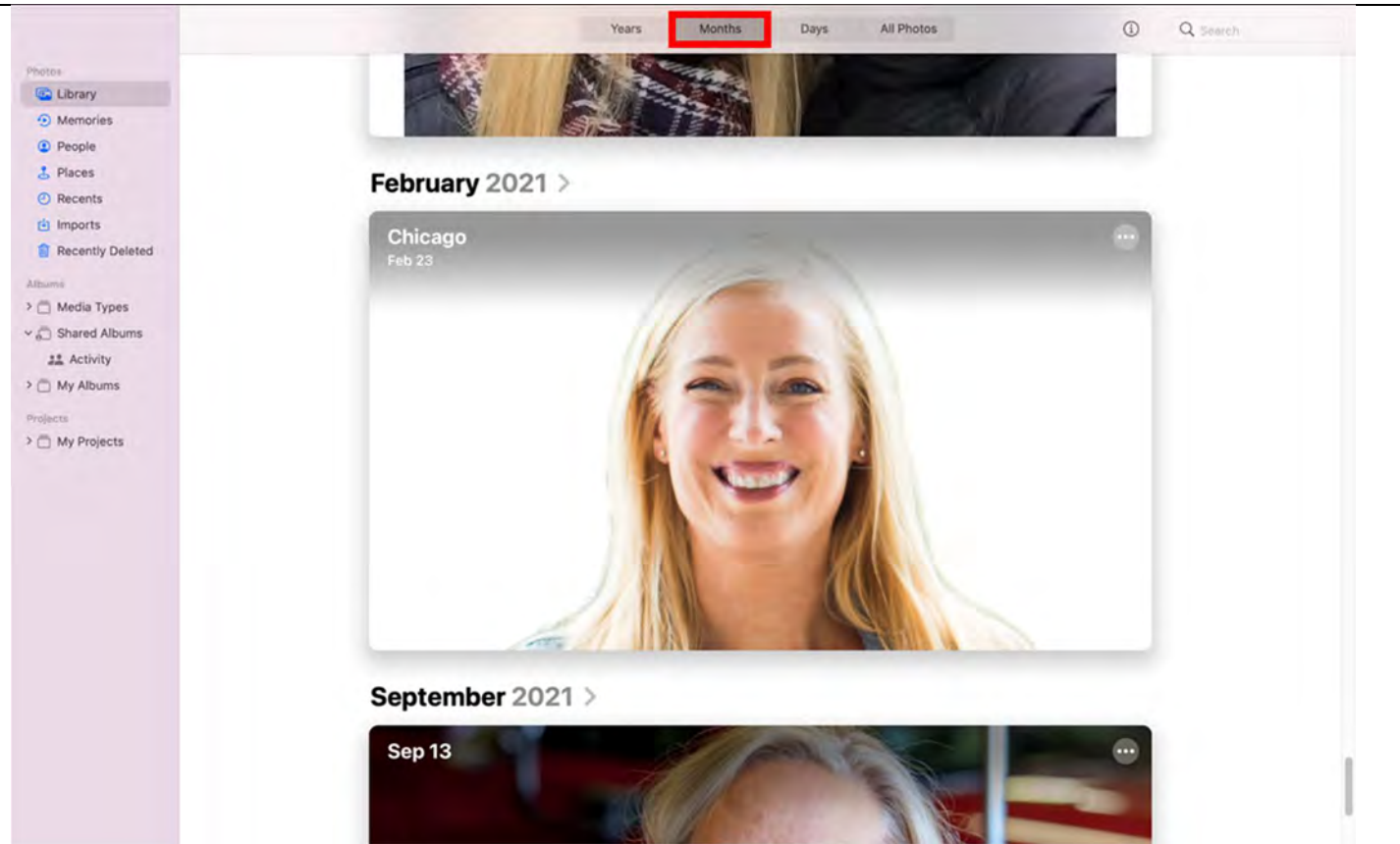
plurality of digital files based on year and causing at least one of the plurality of digital files to be displayed on the interface;



**18[b]** responsive to receiving a month input, grouping the plurality of digital files based on month and causing at least one of the plurality of digital

Responsive to receiving a month input (e.g., tapping the “Months” element), macOS groups the plurality of digital files based on month and causes at least one of the plurality of digital files to be displayed on the interface.

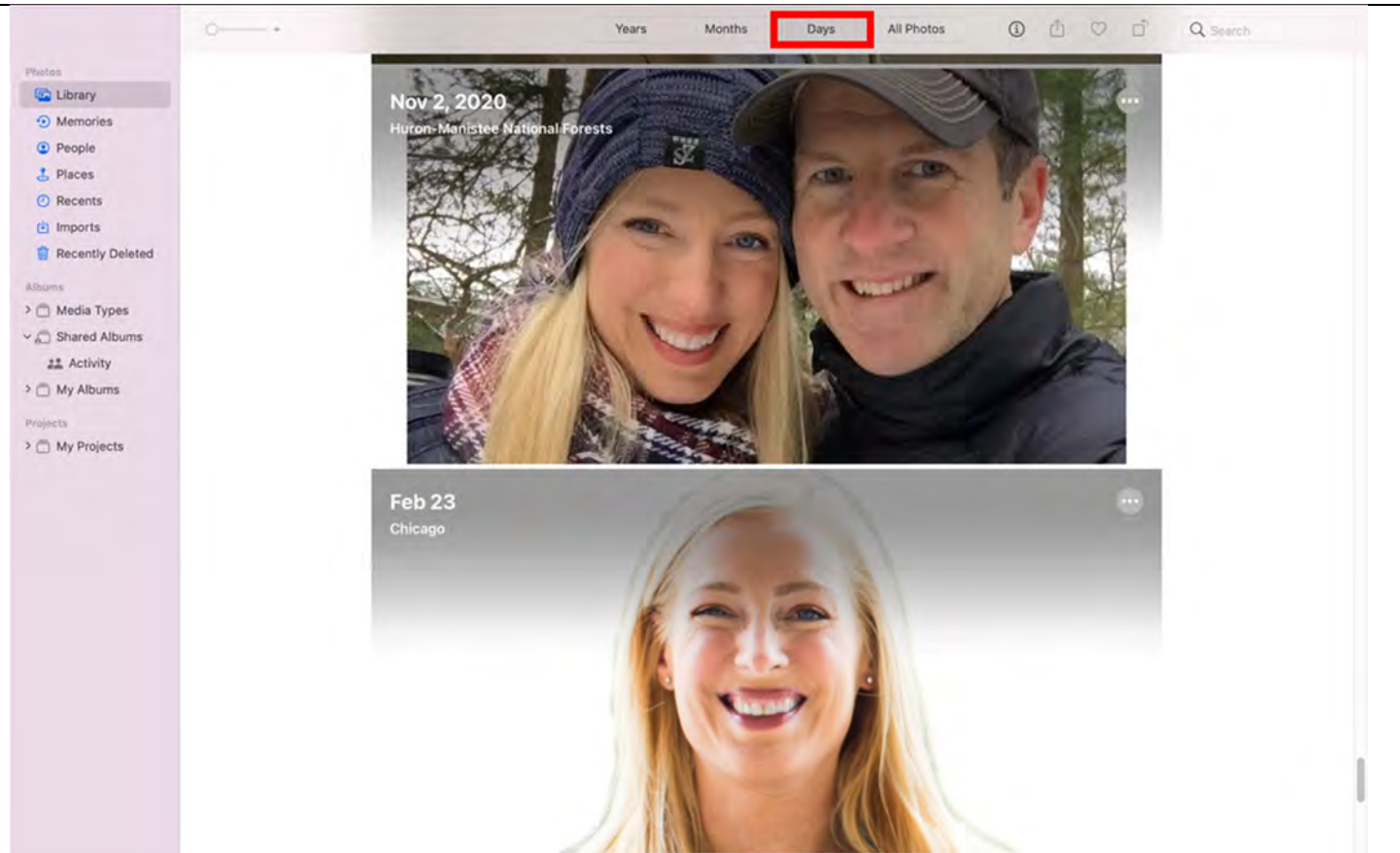
files to be displayed on the interface; and



**18[c]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital files to be

Responsive to receiving a day input (e.g., tapping the “Days” element), macOS groups the plurality of digital files based on day and causes at least one of the plurality of digital files to be displayed on the interface.

displayed on the interface.

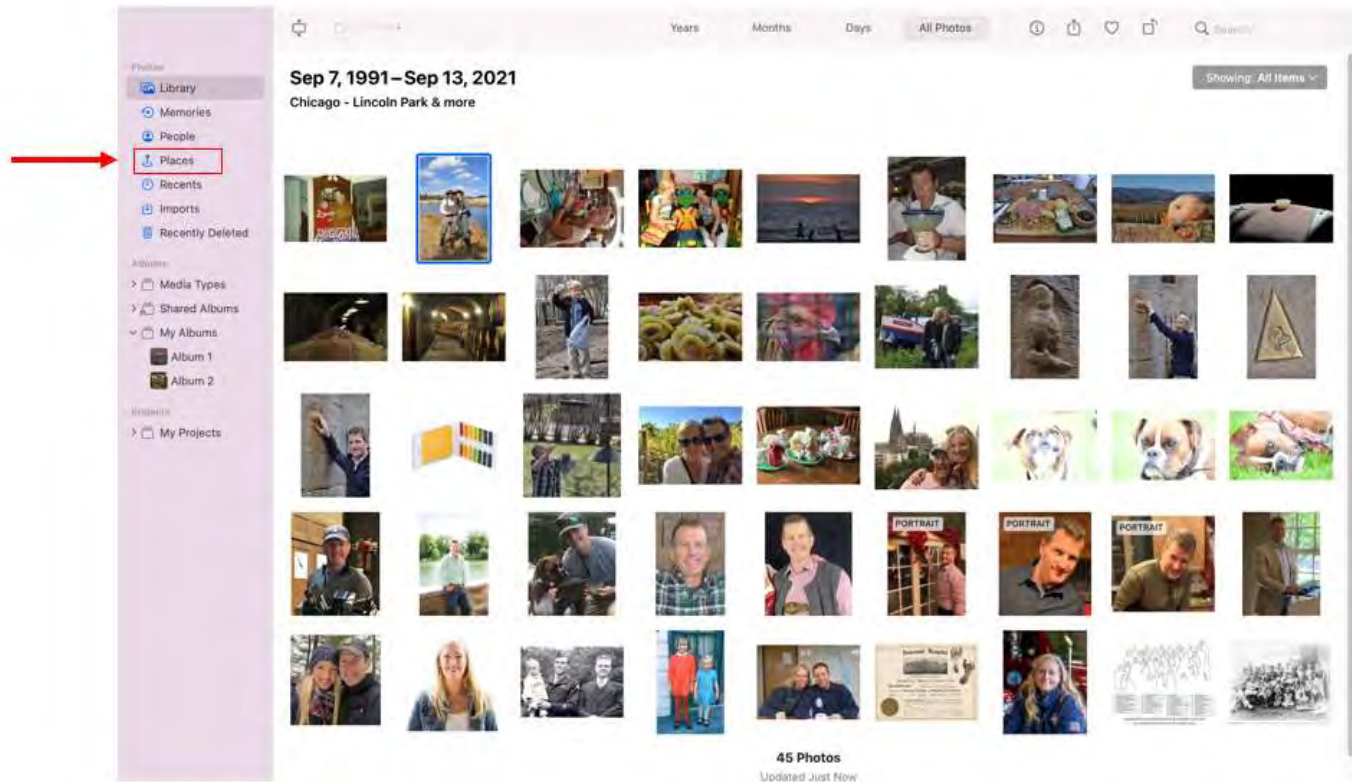


**19.** The method of claim 1, further comprising receiving one or more filtering criteria and causing one or more digital files

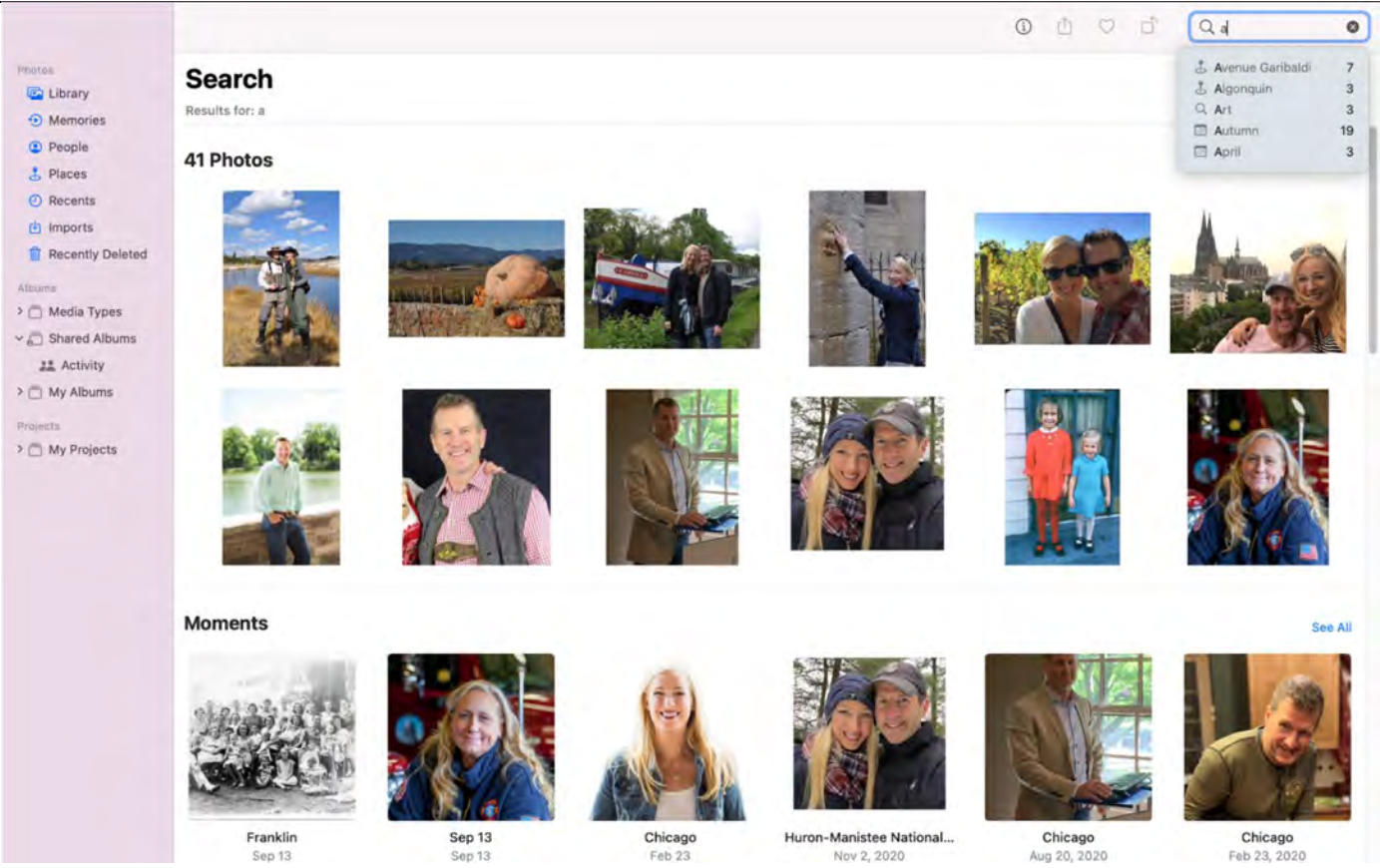
macOS receives one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, macOS provides filtering criteria based on places (e.g., Chicago).



to be displayed on the interface based at least in part on the one or more filtering criteria.



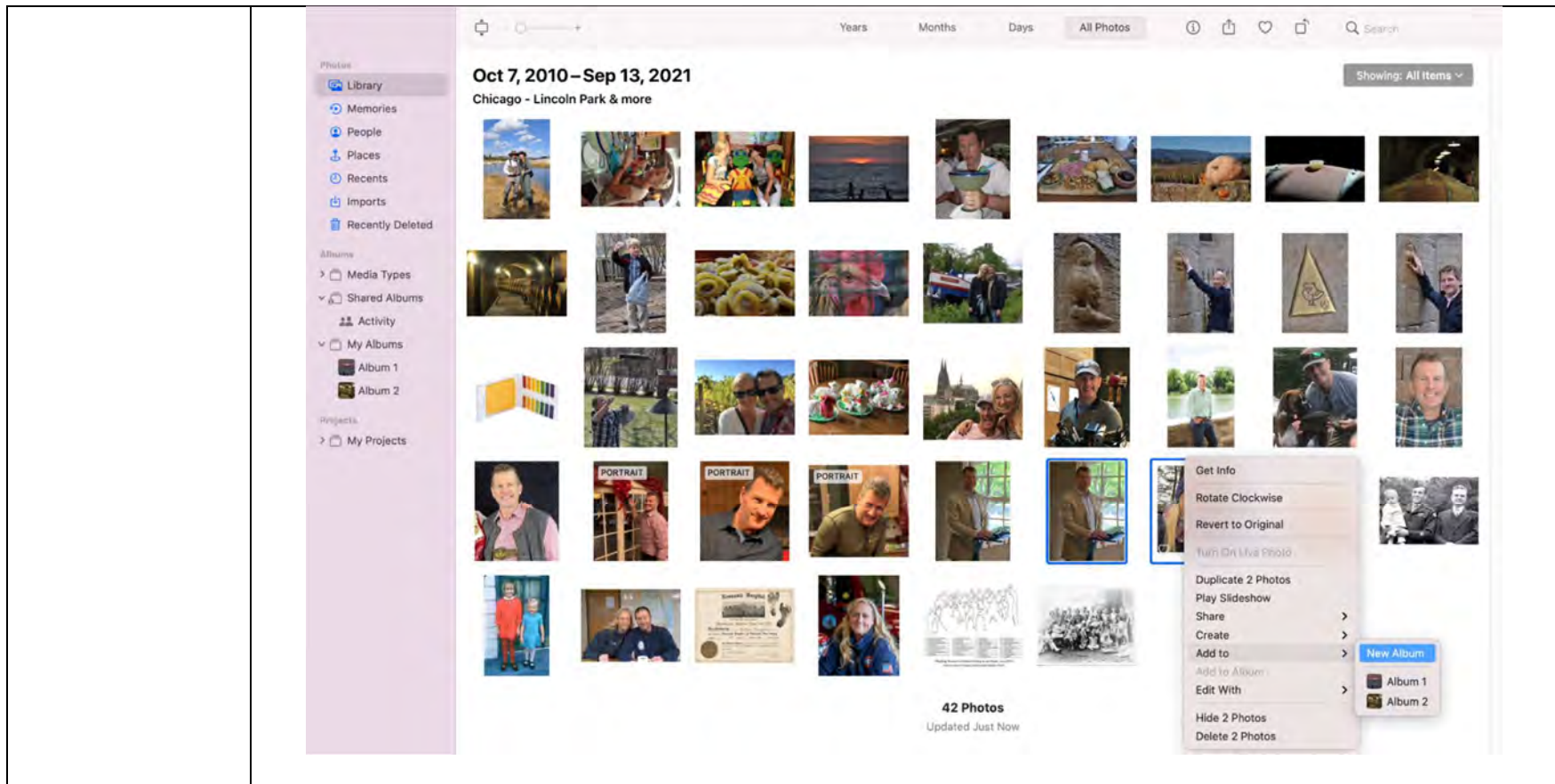
Further, macOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing the letter “a” as a filtering criterion causes digital files to be displayed based on locations or months starting with the letter “a.”

	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with navigation options: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The main area is titled 'Search' and shows 'Results for: a' with '41 Photos'. A search dropdown menu is open, listing: Avenue Garibaldi (7), Algonquin (3), Art (3), Autumn (19), and April (3). Below the search results are two sections: '41 Photos' (a grid of 12 photo thumbnails) and 'Moments' (a row of 6 photo thumbnails with captions: Franklin Sep 13, Sep 13 Sep 13, Chicago Feb 23, Huron-Manistee National... Nov 2, 2020, Chicago Aug 20, 2020, Chicago Feb 23, 2020). A 'See All' link is visible at the end of the Moments row.</p>
	<p>The filtering criteria discussed above are exemplary: macOS may receive many different filtering criteria.</p>
<p><b>20[pre]</b> The method of claim 19, further comprising:</p>	<p>See information for claim 19.</p>

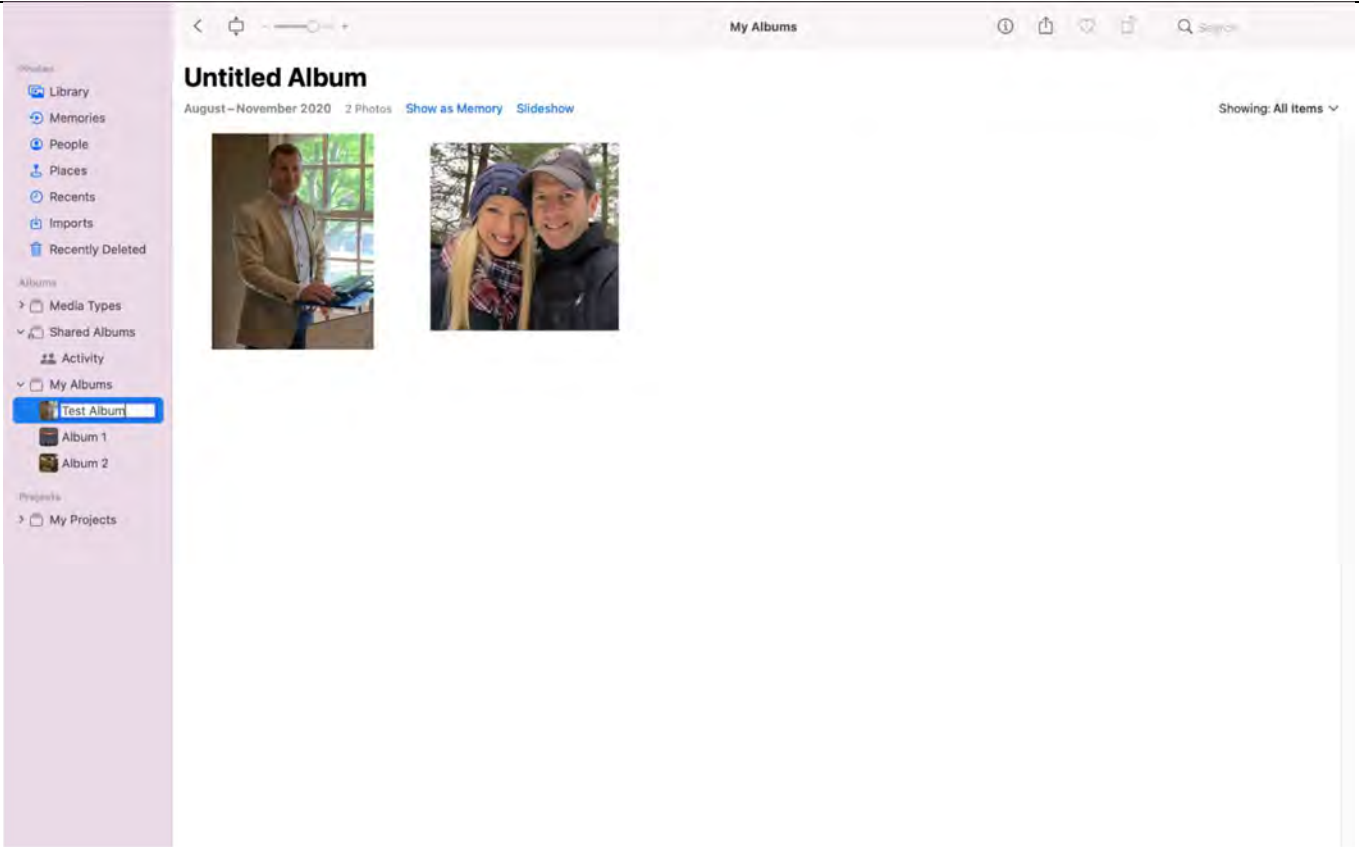


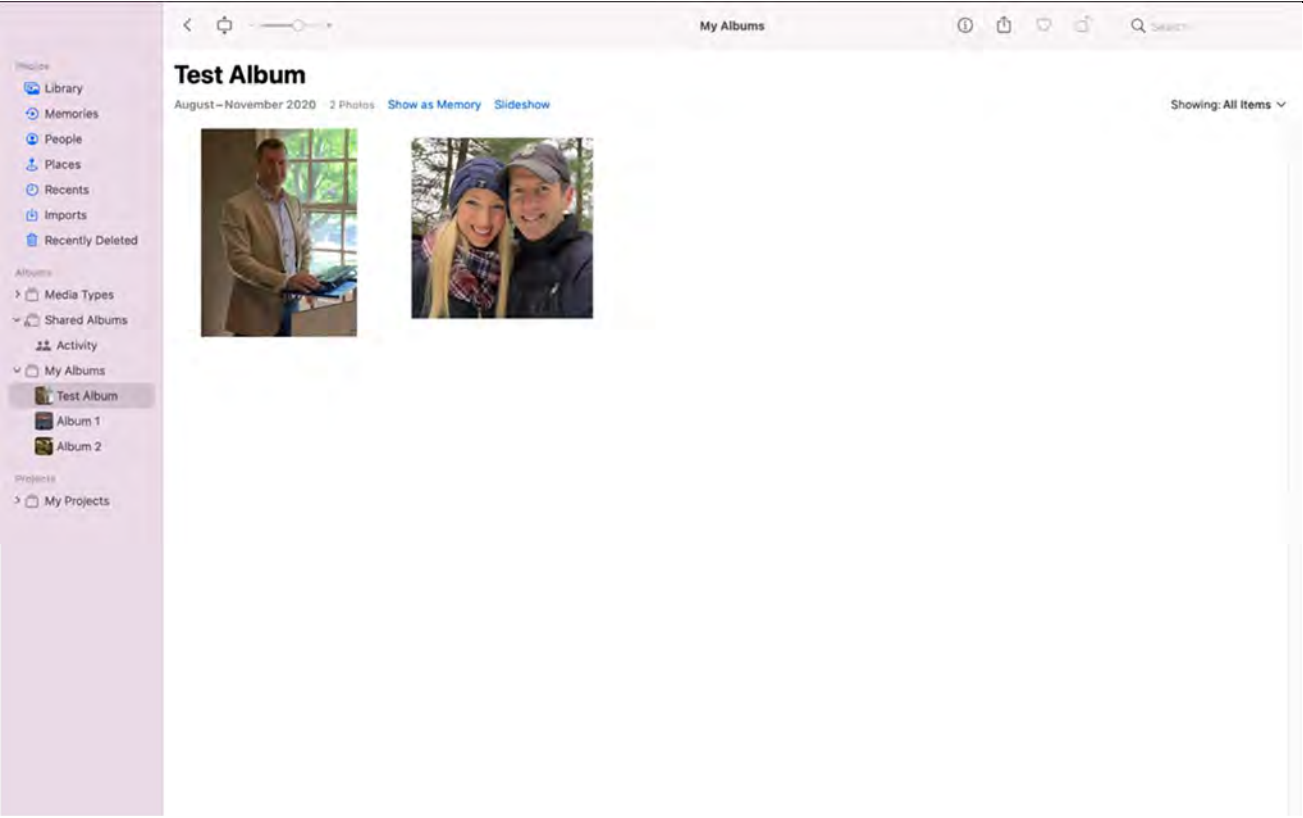


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

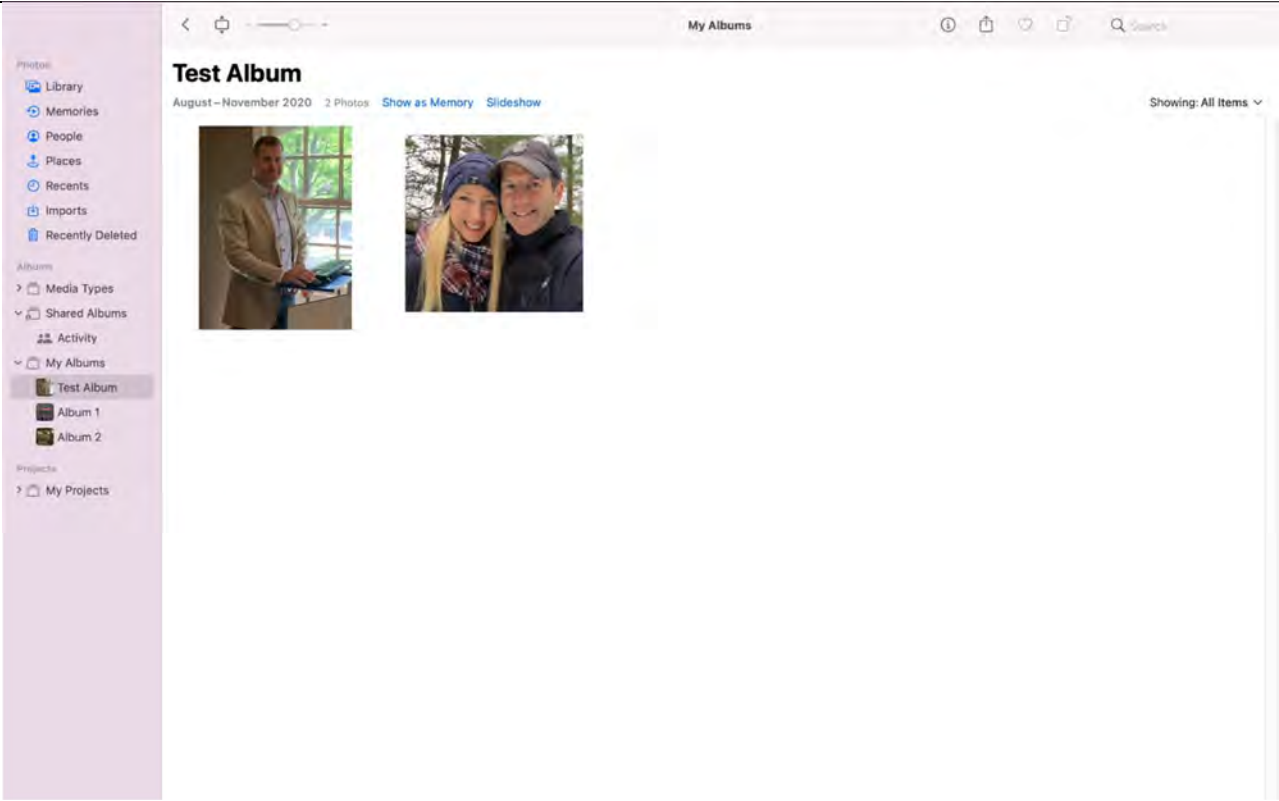


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

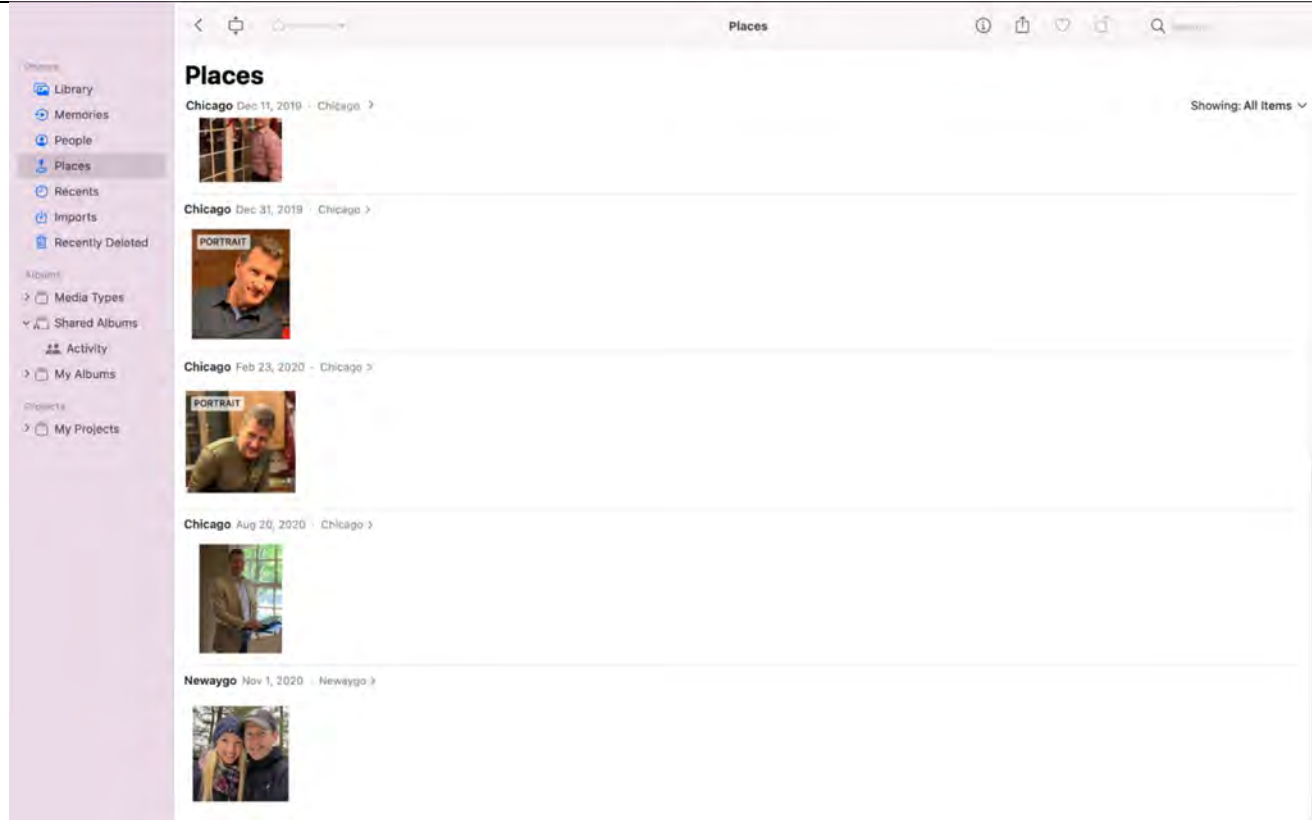
	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places, Recents, Imports, Recently Deleted, Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The 'My Albums' section is expanded, showing 'Test Album' selected. The main area displays an album titled 'Untitled Album' with a date range of 'August–November 2020' and '2 Photos'. Two photos are visible: a man in a suit and a couple outdoors. The top right corner shows 'My Albums' and a search bar.</p>
<p><b>20[c]</b> causing each of the plurality of images to be associated with an album name; and</p>	<p>macOS causes each of the plurality of images to be associated with an album name. For example, as shown below, each of the plurality of images are displayed with the album name.</p>

	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places, Recents, Imports, Recently Deleted, Albums (with sub-options Media Types, Shared Albums, Activity, My Albums), and Projects (with sub-option My Projects). The 'My Albums' section is expanded, showing 'Test Album' selected. The main area displays the 'Test Album' view, which includes the album name, a date range 'August–November 2020', a photo count '2 Photos', and options for 'Show as Memory' and 'Slideshow'. Two photos are shown in a grid: a man in a suit and a couple in winter gear. The top right corner shows 'My Albums' and a search bar.</p>
<p><b>20[d]</b> causing an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>	<p>macOS causes an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with categories: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The 'My Albums' section is expanded, showing 'Test Album', 'Album 1', and 'Album 2'. The main window displays the 'Test Album' with the title 'Test Album' and subtitle 'August–November 2020 2 Photos'. It shows two photo thumbnails: a man in a suit and a couple in winter gear. The top right of the window has a search bar and a 'Showing: All Items' dropdown.</p>
<p><b>21[pre]</b> The method of claim 2, further comprising</p>	<p><i>See information for claim 2.</i></p>
<p><b>21[a]</b> responsive to a selection associated with the first location, causing the first set of digital files</p>	<p>Responsive to a selection associated with the first location, causing the first set of digital files to be displayed on the interface.</p>

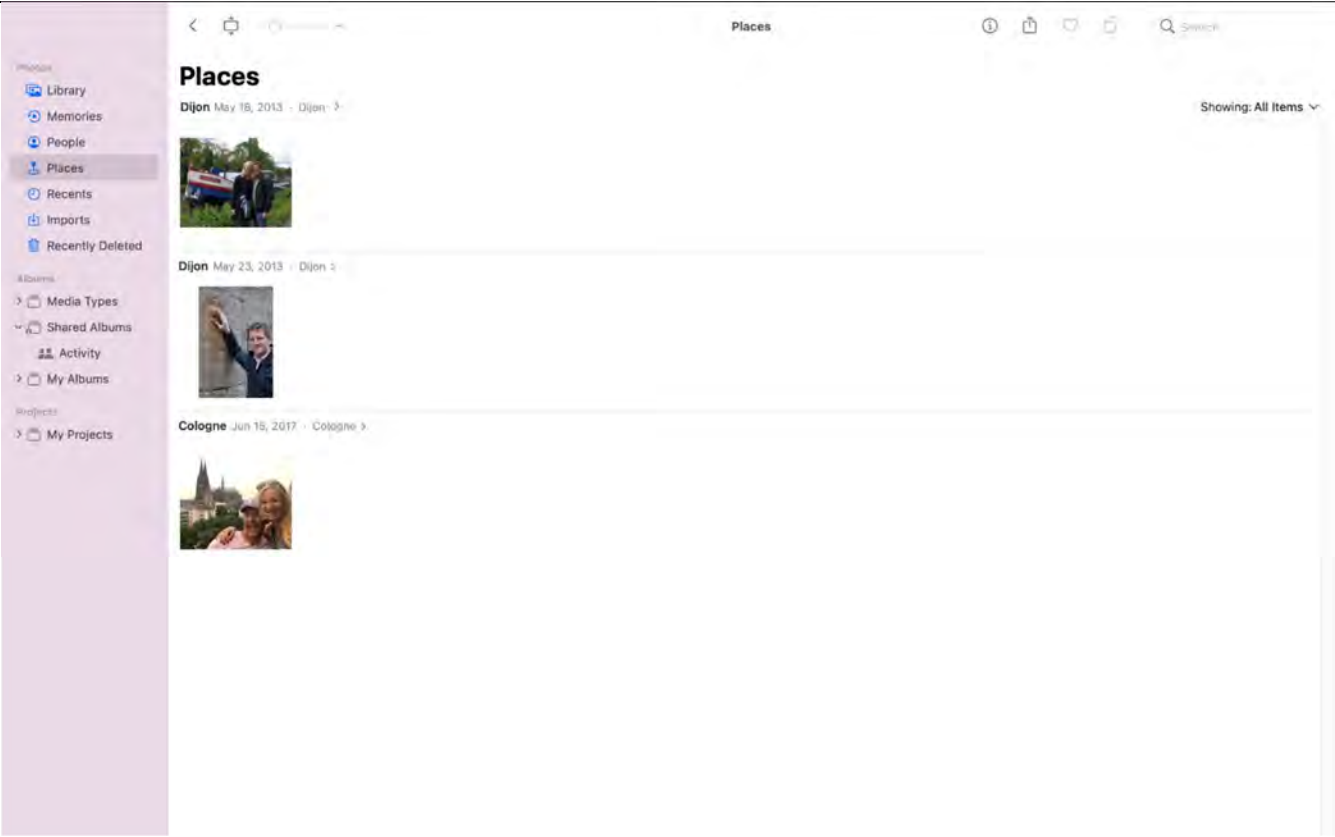
to be displayed on the interface and



**21[b]** responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.

Responsive to a selection associated with the second location, causing the first set of digital files to be displayed on the interface.



	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places (selected), Recents, Imports, and Recently Deleted. Below these are sections for Albums (Media Types, Shared Albums, Activity, My Albums) and Projects (My Projects). The main area is titled 'Places' and displays a list of location-based photo albums. The first album is 'Dijon' from May 18, 2013, with a thumbnail showing a person in a field. The second album is 'Dijon' from May 23, 2013, with a thumbnail of a person pointing at a wall. The third album is 'Cologne' from Jun 15, 2017, with a thumbnail of a person in front of a church. The interface includes a search bar at the top right and a 'Showing: All Items' dropdown.</p>
<p><b>22.</b> The method of claim 21, further comprising causing (i) a first number associated with a number of digital files in the first set of digital files to be</p>	<p>The first location view displayed by macOS includes (i) a first number associated with a number of digital files in the first set of digital files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files on the interface.</p>

displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.

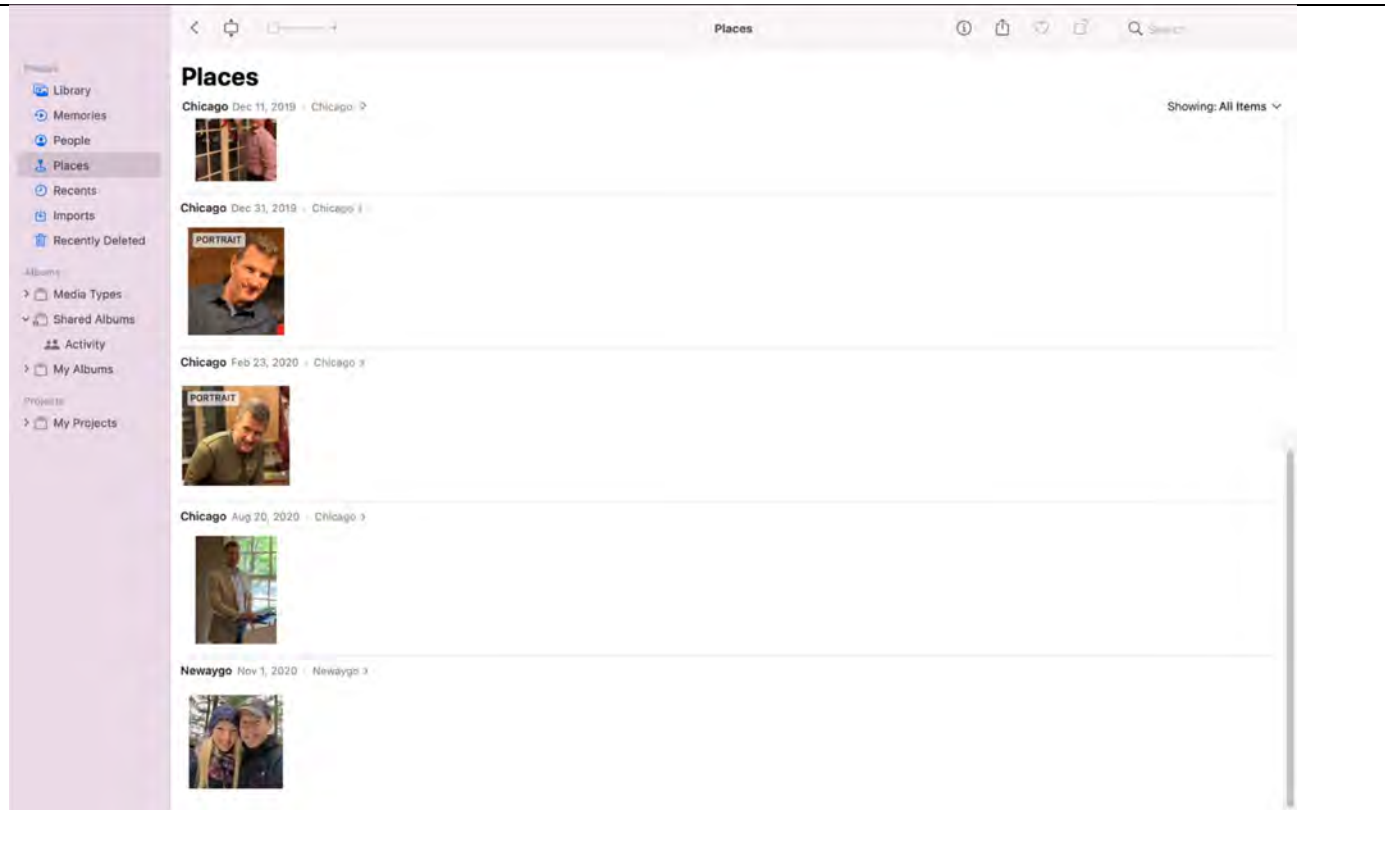


**23.** The method of claim 3, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files

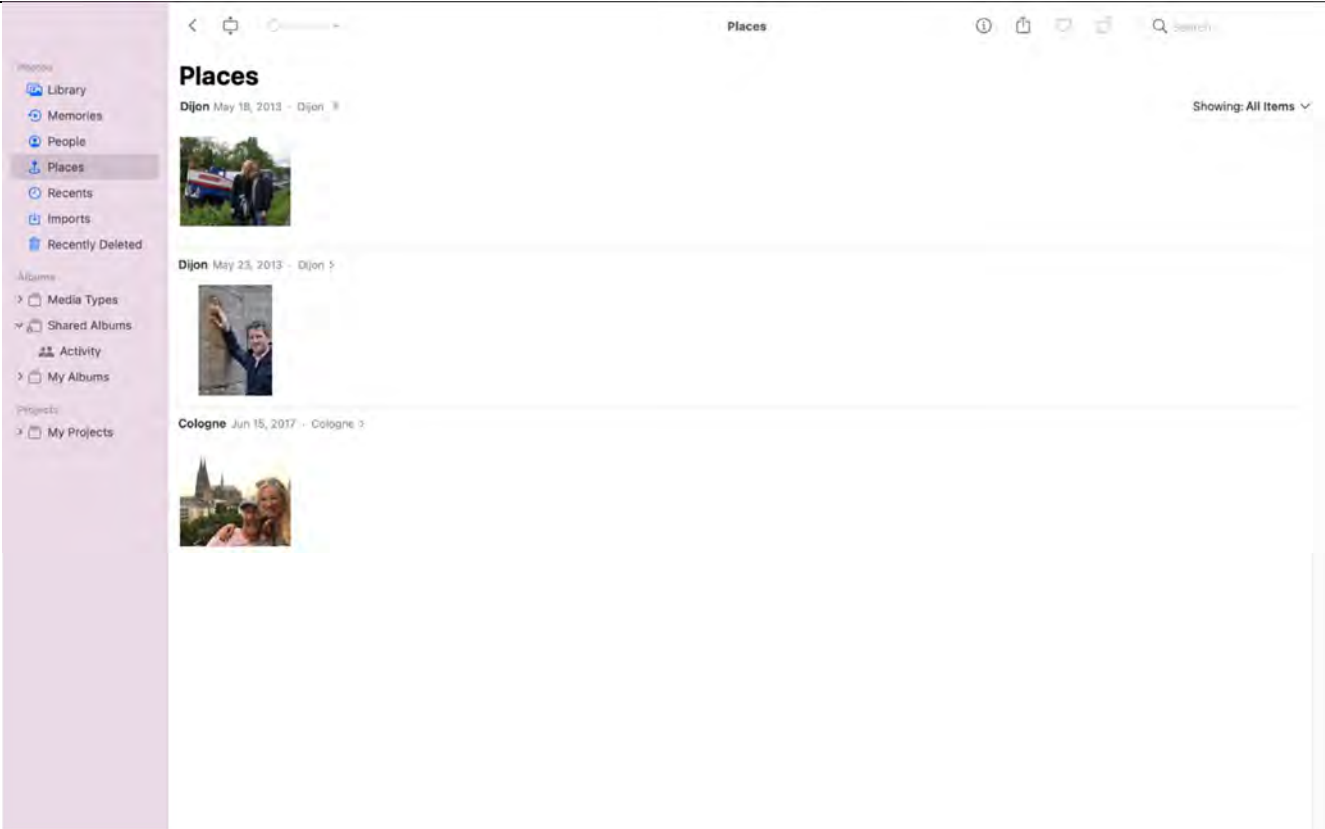
Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

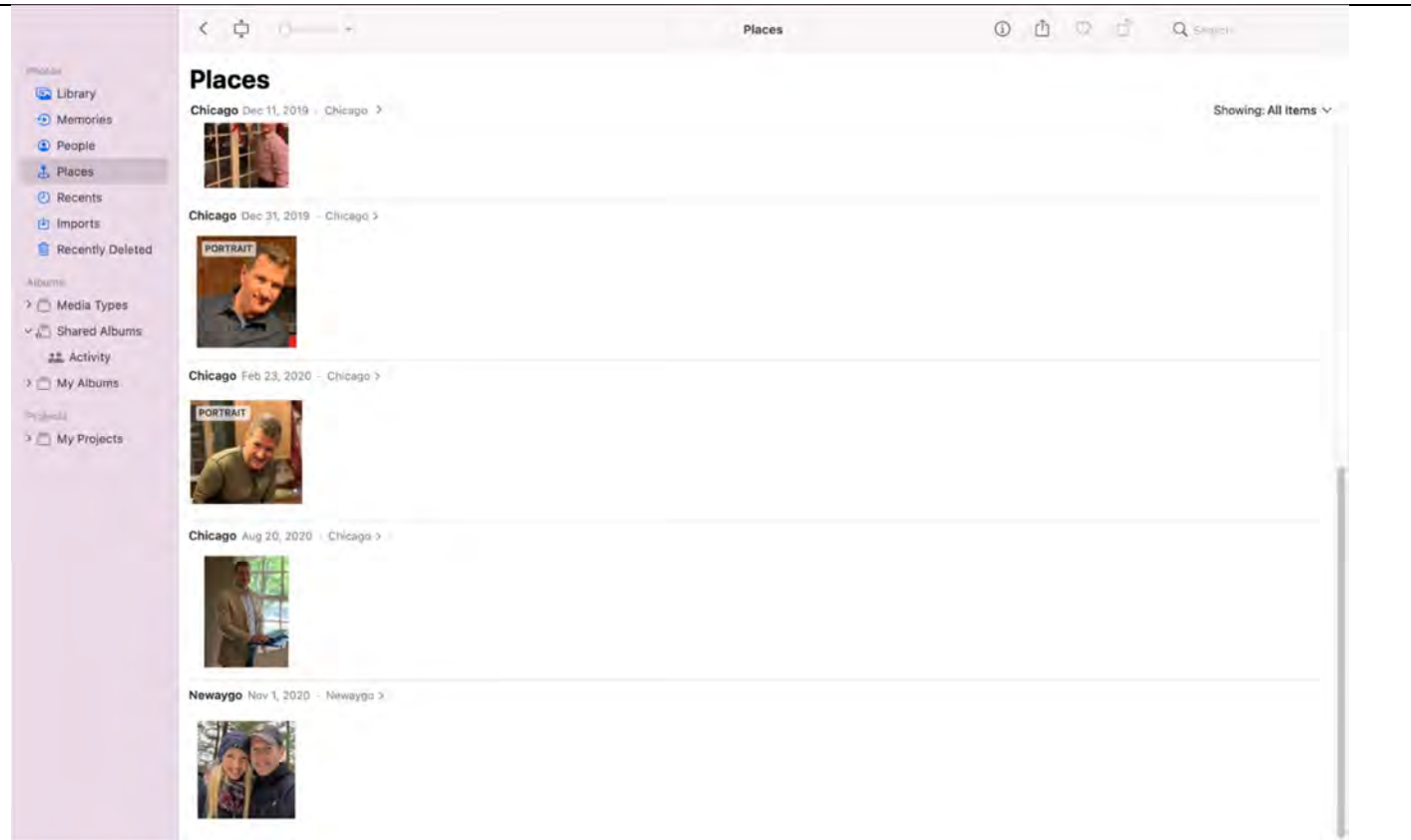
include a photo, a video, or both.



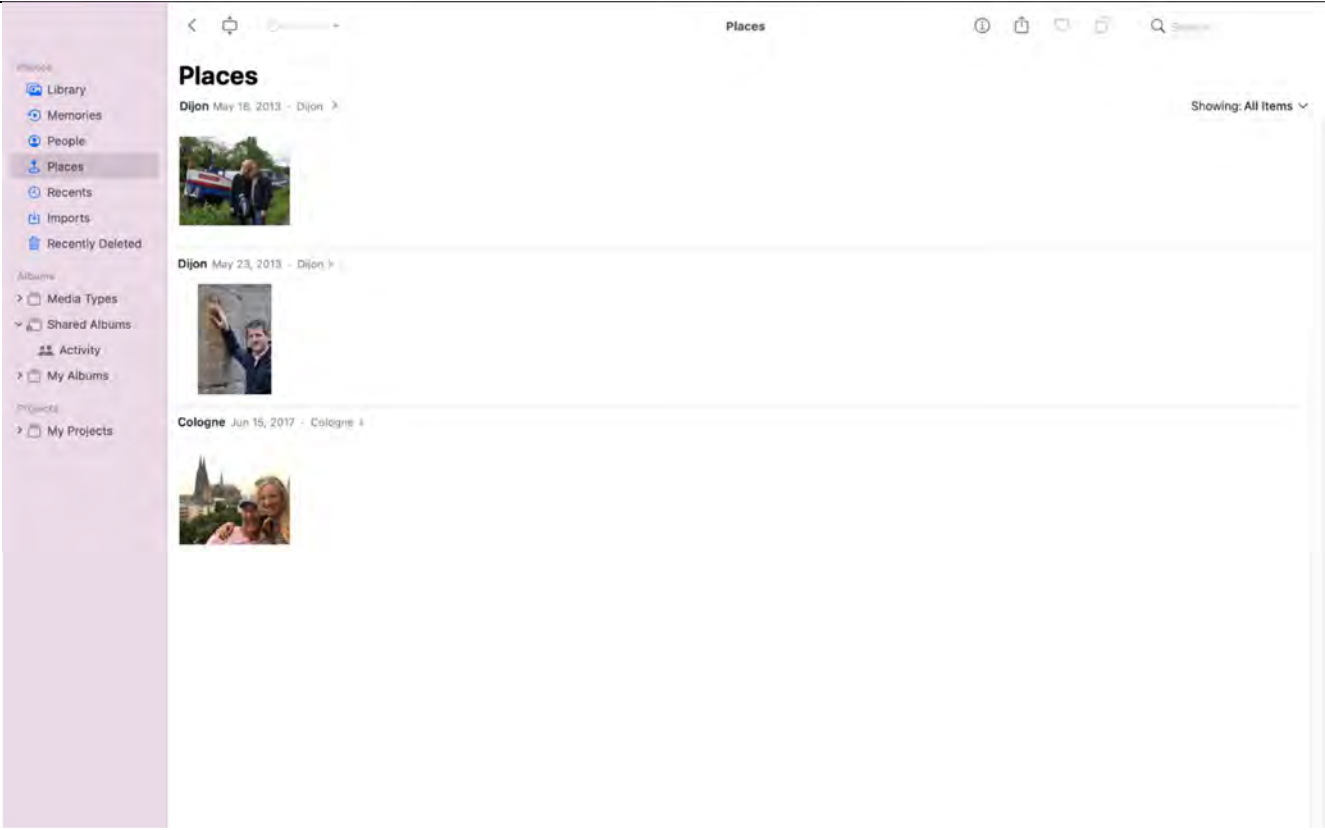
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	
<p><b>25[pre]</b> The method of claim 21,</p>	<p><i>See information for claim 21.</i></p>
<p><b>25[a]</b> wherein at least one digital file in the first set of digital files displayed on the interface</p>	<p>At least one digital file in the first set of digital files displayed on the interface responsive to the selection associated with the first location is not overlaid on the interactive geographic map.</p>

responsive to the selection associated with the first location is not overlaid on the interactive geographic map and

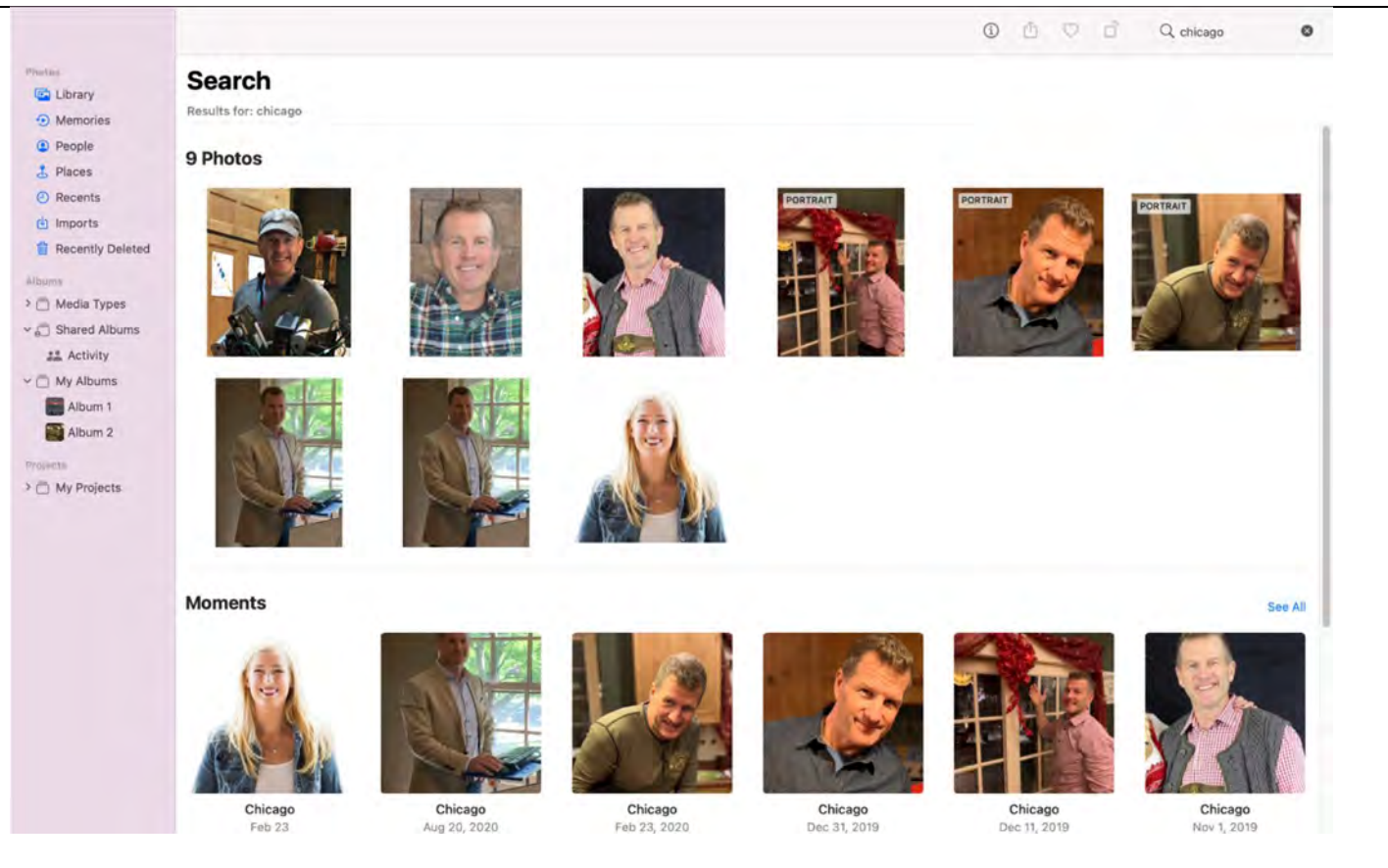


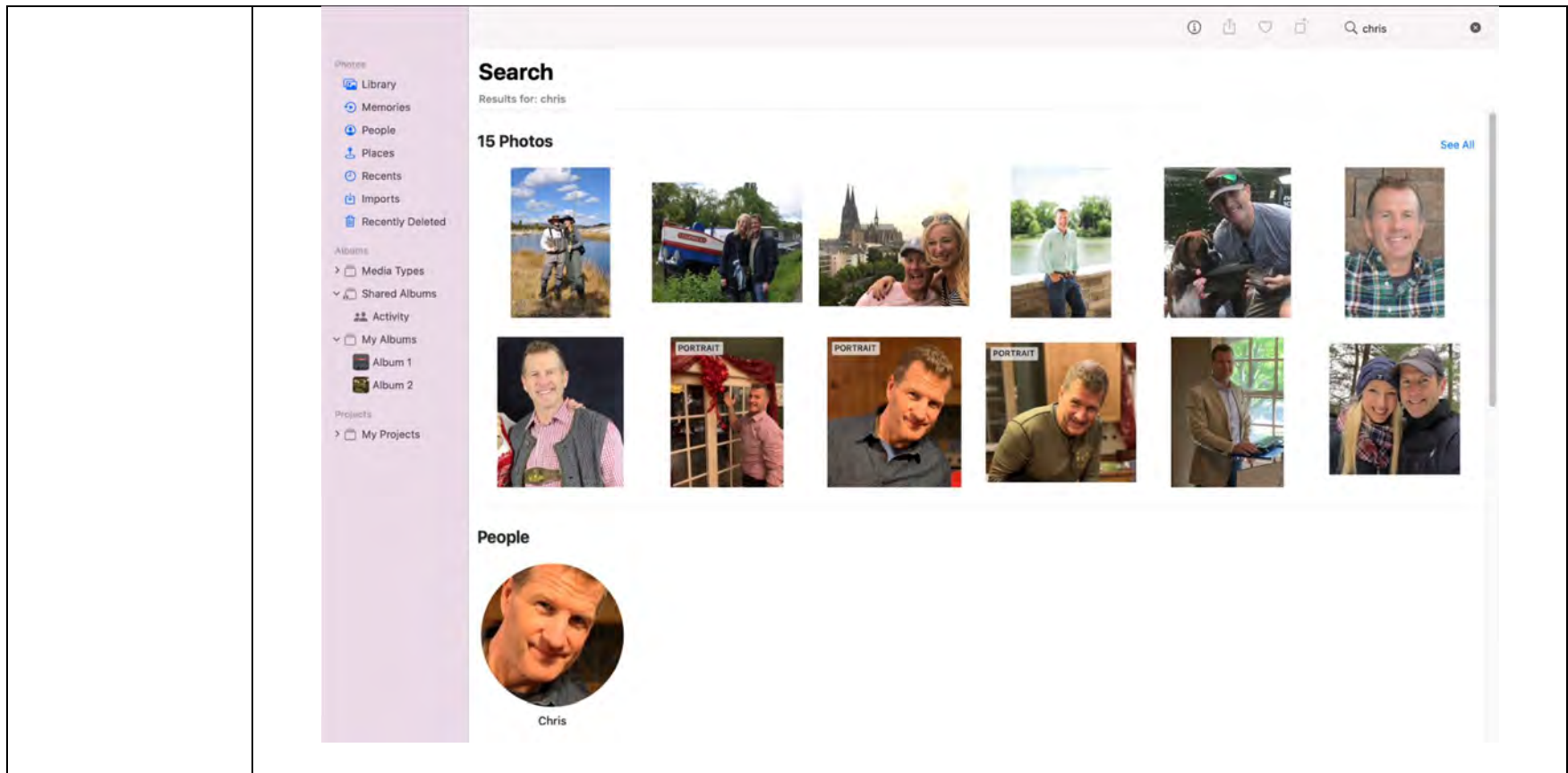
**25[b]** at least one digital file in the second set of digital files displayed on the interface responsive to the selection associated with the second location

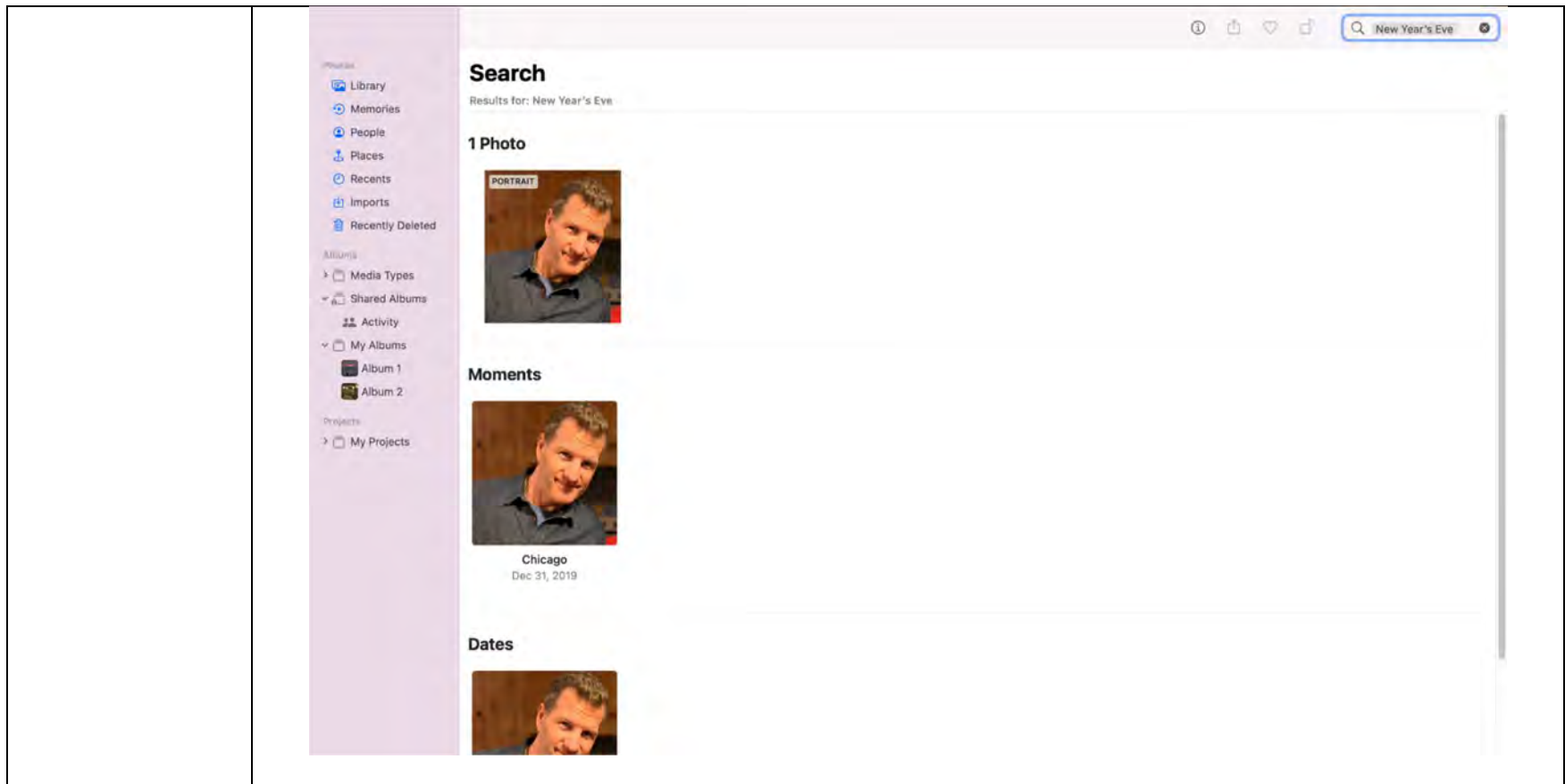
<p>are not overlaid on the interactive geographic map.</p>	
<p><b>26.</b> The method of claim 19, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>

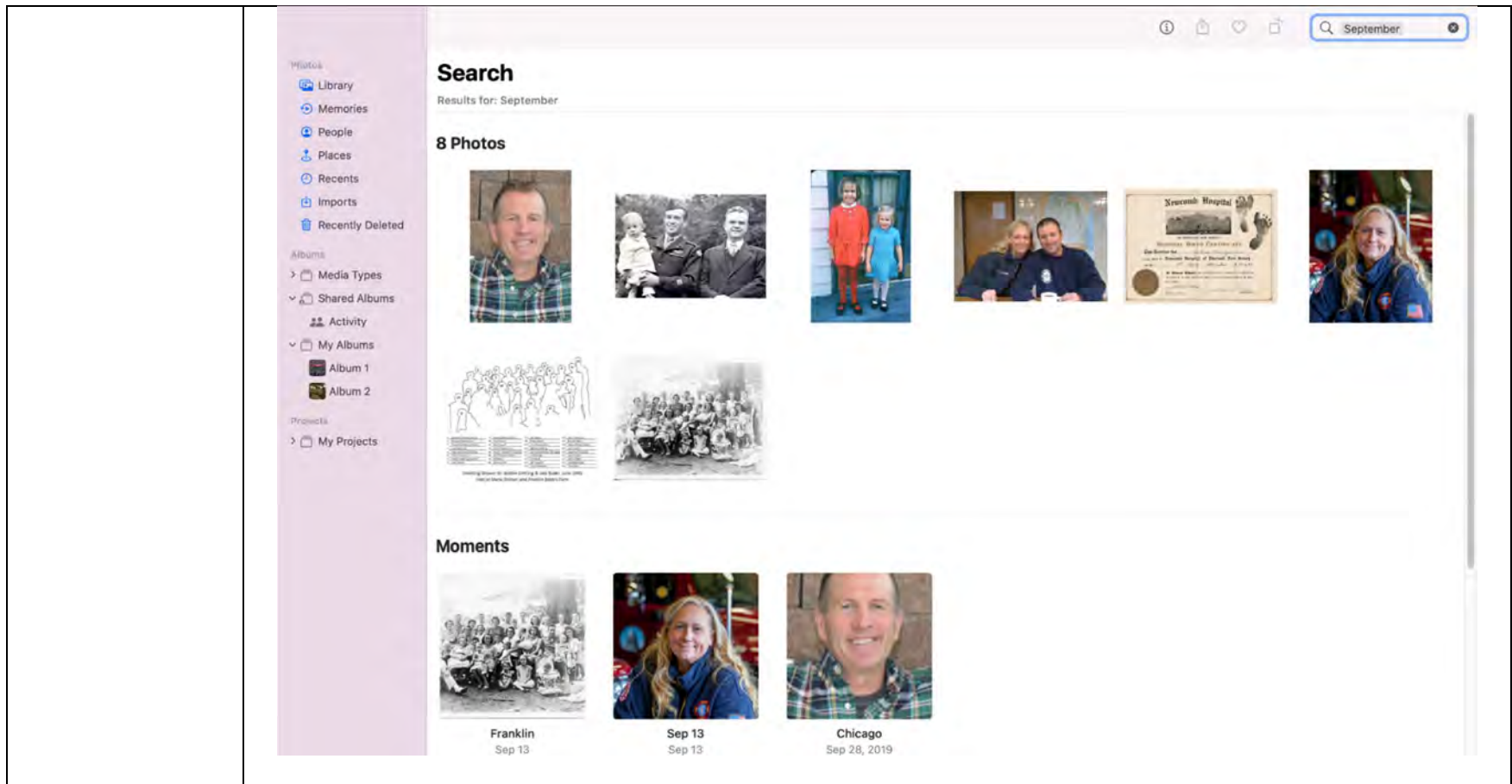


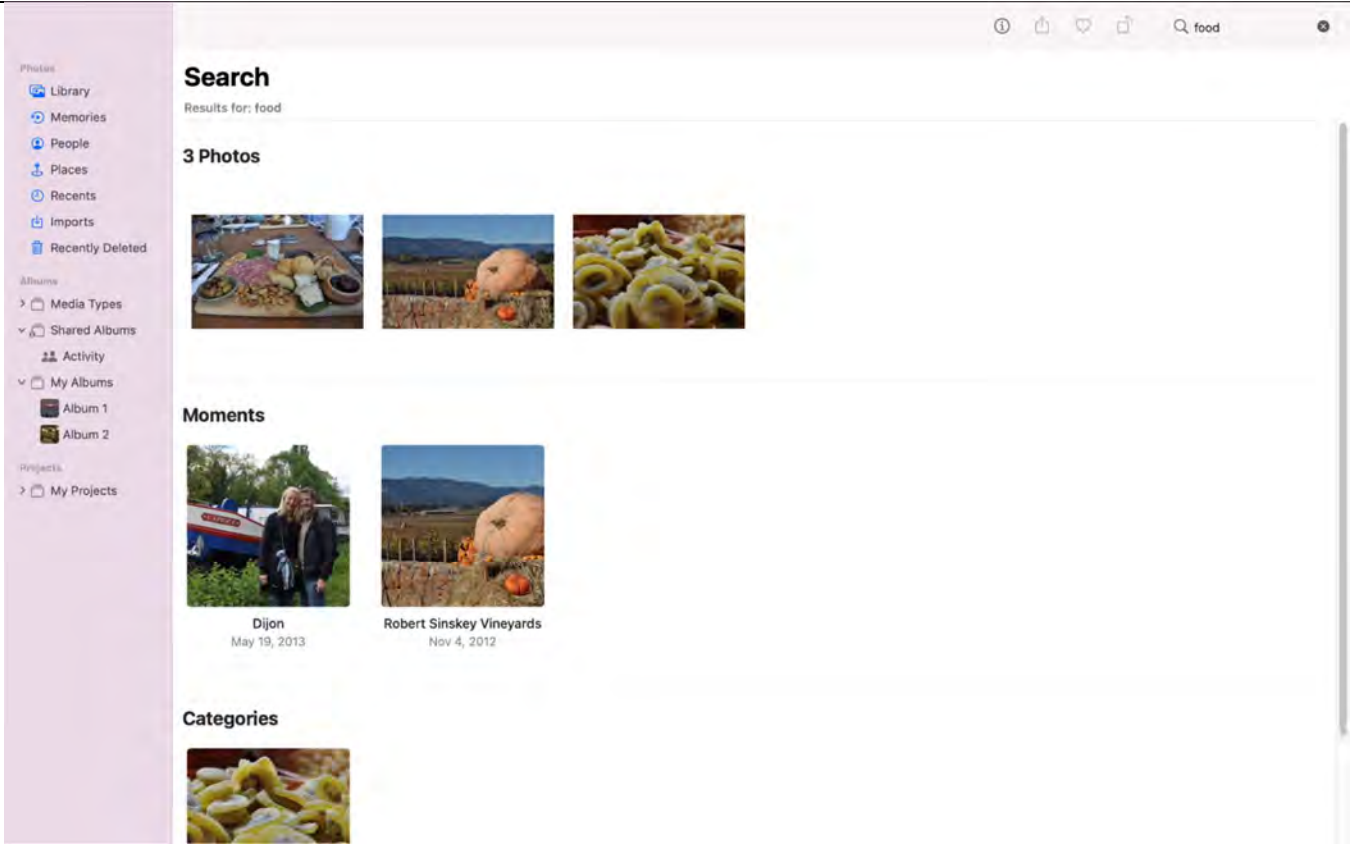
combination thereof.





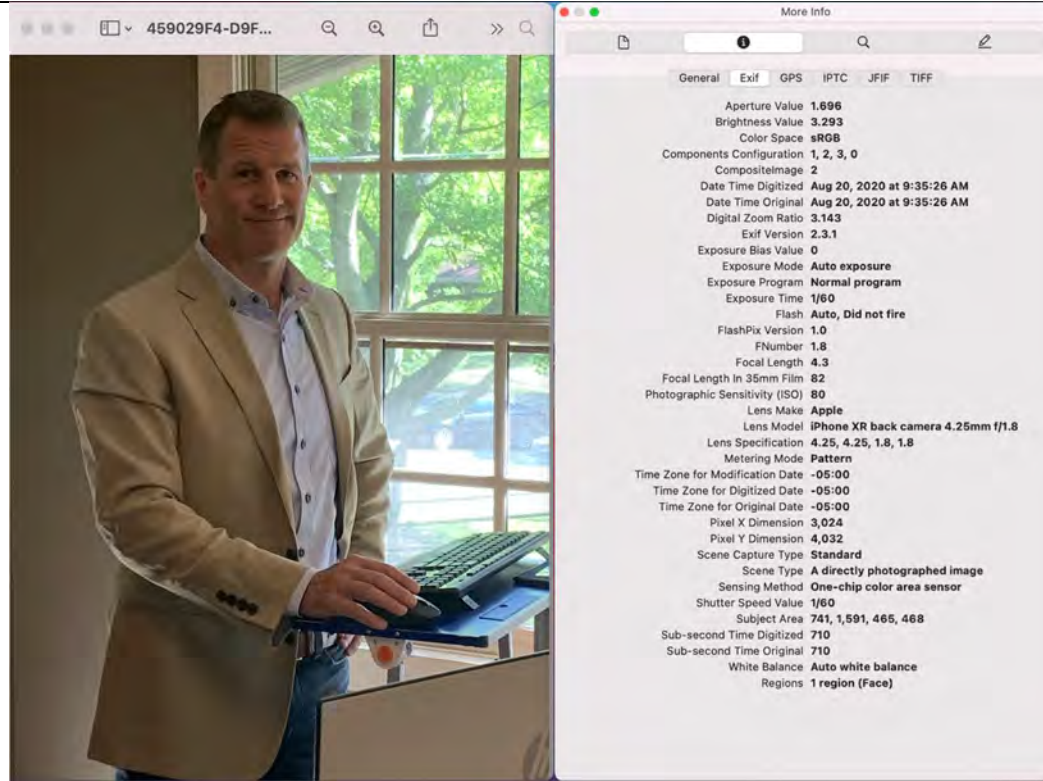




	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with navigation options: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The main area displays search results for 'food'. Under the 'Search' heading, it says 'Results for: food' and shows '3 Photos'. Below this are three photo thumbnails: a plate of food, a pumpkin in a field, and a close-up of yellow food items. Under the 'Moments' heading, there are two photo thumbnails with captions: 'Dijon' (May 19, 2013) and 'Robert Sinskey Vineyards' (Nov 4, 2012). Under the 'Categories' heading, there is one photo thumbnail of yellow food items.</p>
<p><b>27.</b> The method of claim 10, wherein the exporting the first digital file includes exporting the first digital file to another device (e.g., an iPhone using AirDrop), then exporting the same first digital file back to macOS, which the EXIF data is clearly visible</p>	<p>exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file. This is evidenced by, for example, exporting the first digital file to another device (e.g., an iPhone using AirDrop), then exporting the same first digital file back to macOS, which the EXIF data is clearly visible.</p>



associated with the first digital file.



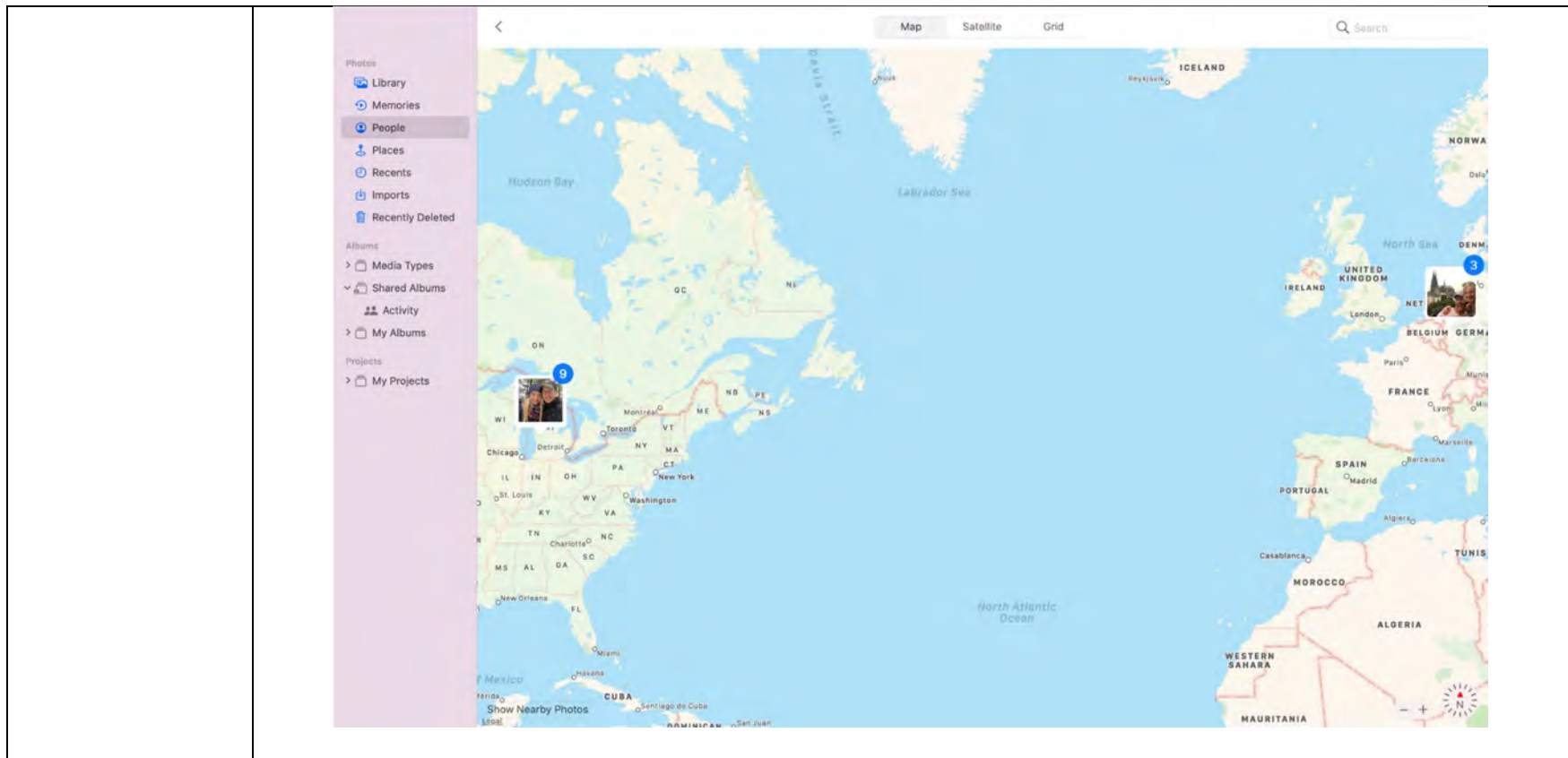
**28.** The method of claim 1, wherein the input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image

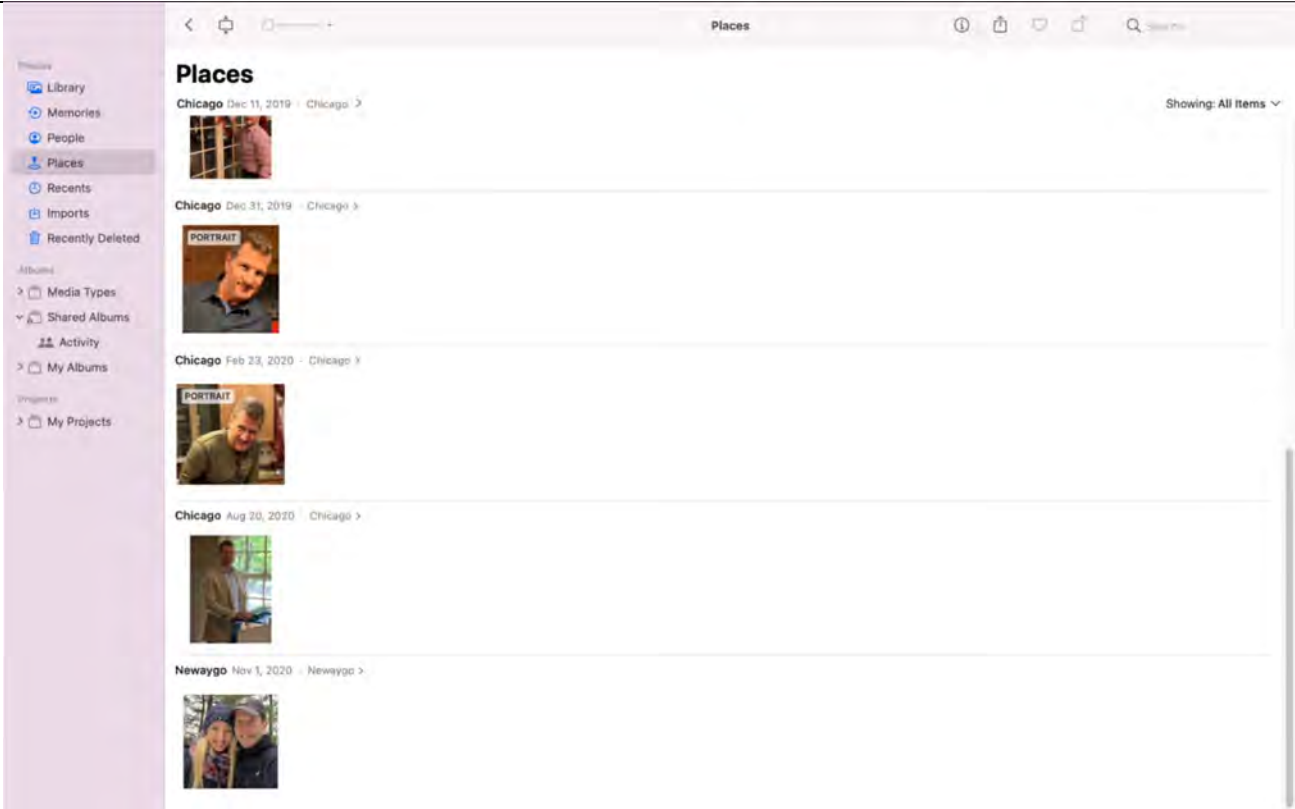
The input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image associated with the first person. *See* information for limitation 1[b].



<p>associated with the first person.</p>	
<p><b>29.</b> The method of claim 1, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.</p>	<p>The input that is indicative of the selection of the first map image is a touch or click of the first map image. <i>See</i> information for limitation 1[c].</p>
<p><b>30[pre]</b> The method of claim 25, wherein</p>	<p><i>See</i> information for claim 25.</p>
<p><b>30[a]</b> each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map and</p>	<p>Each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map.</p>

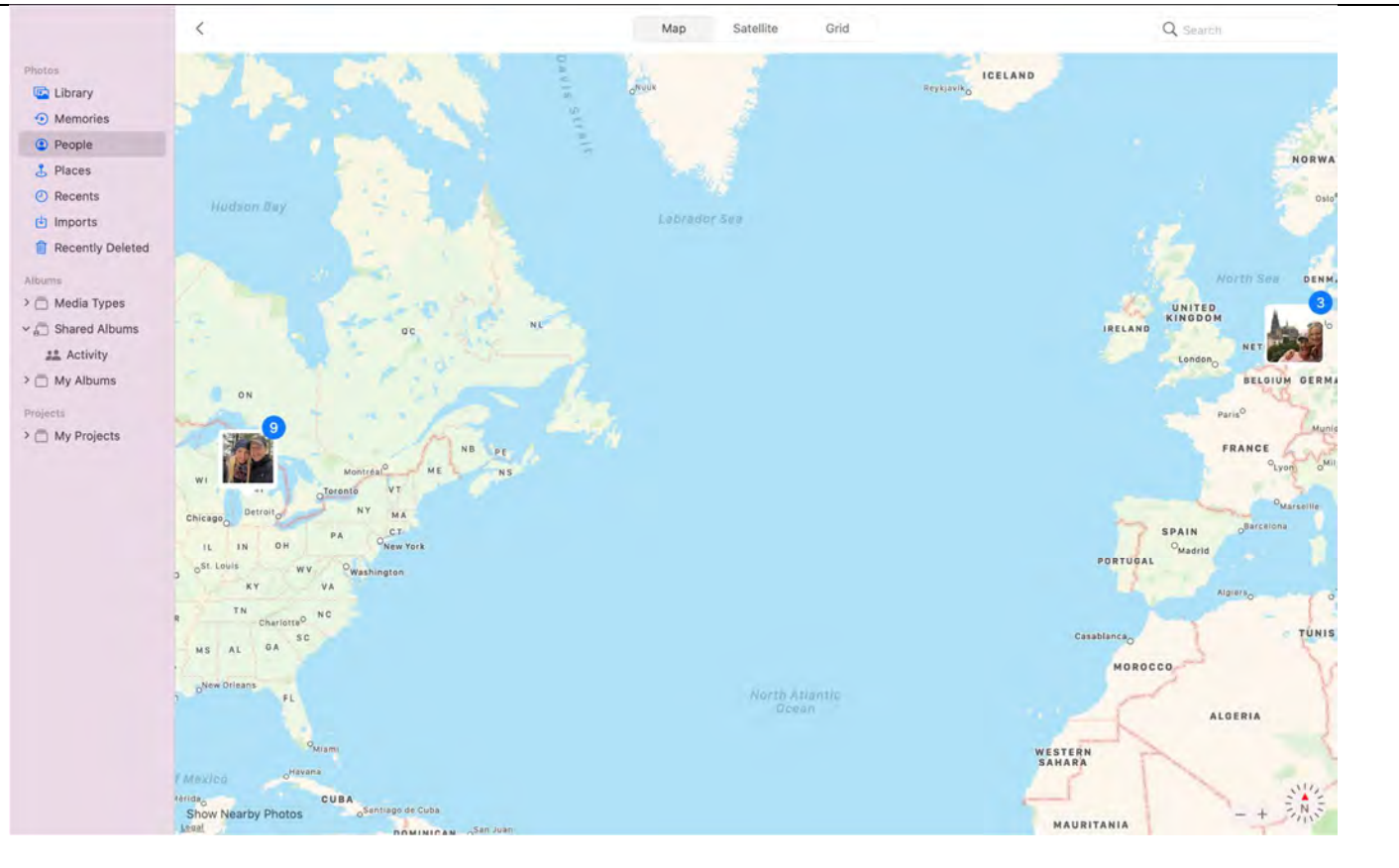
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



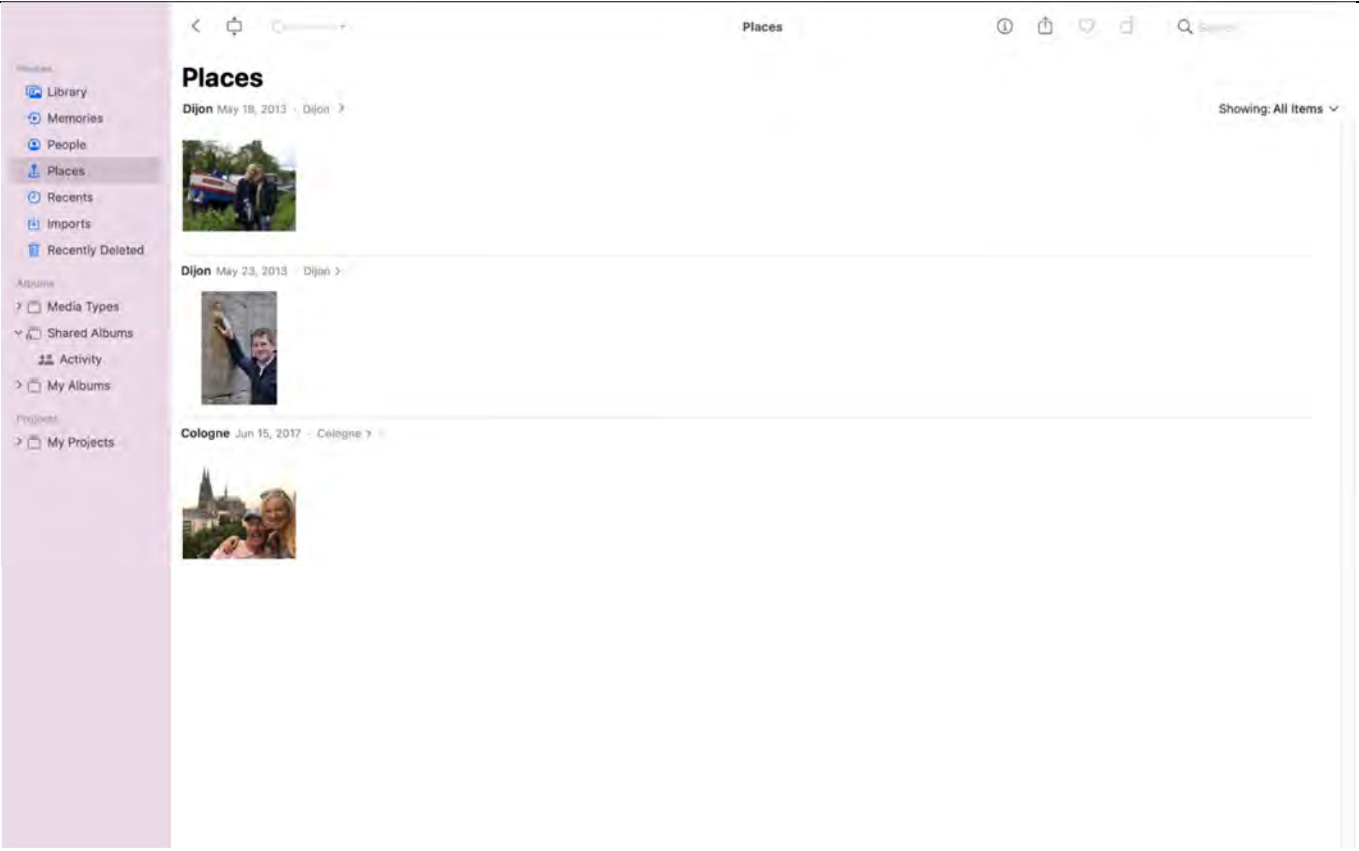
	
<p><b>30[b]</b> each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>

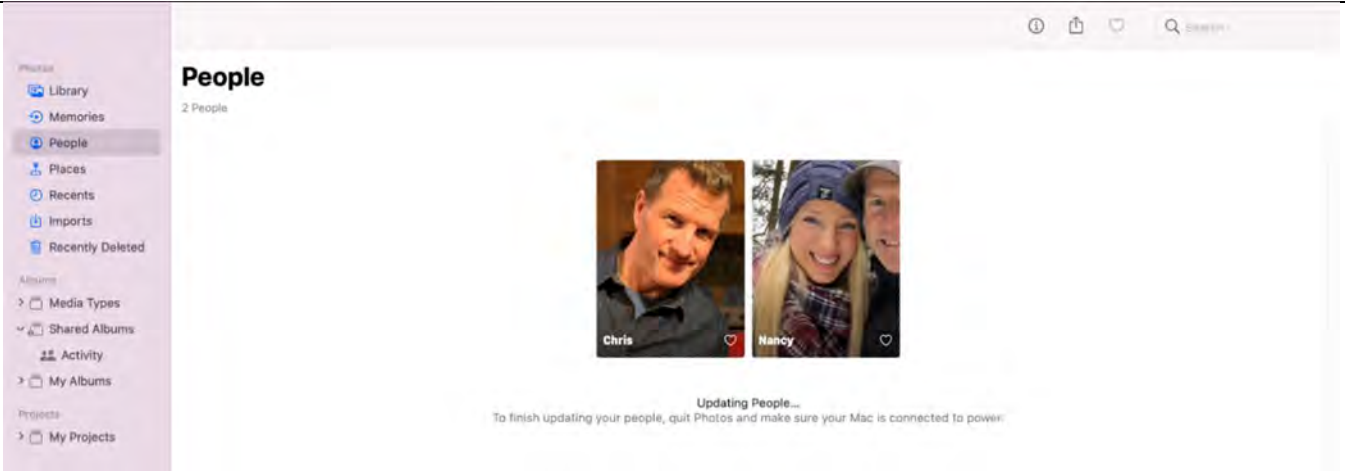
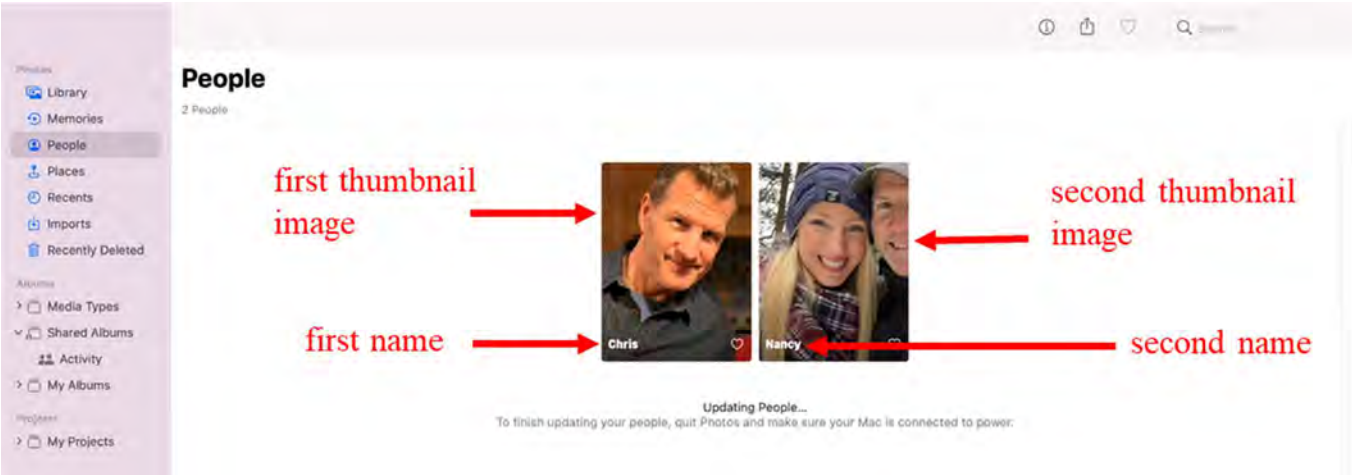
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

are not overlaid on the interactive geographic map.



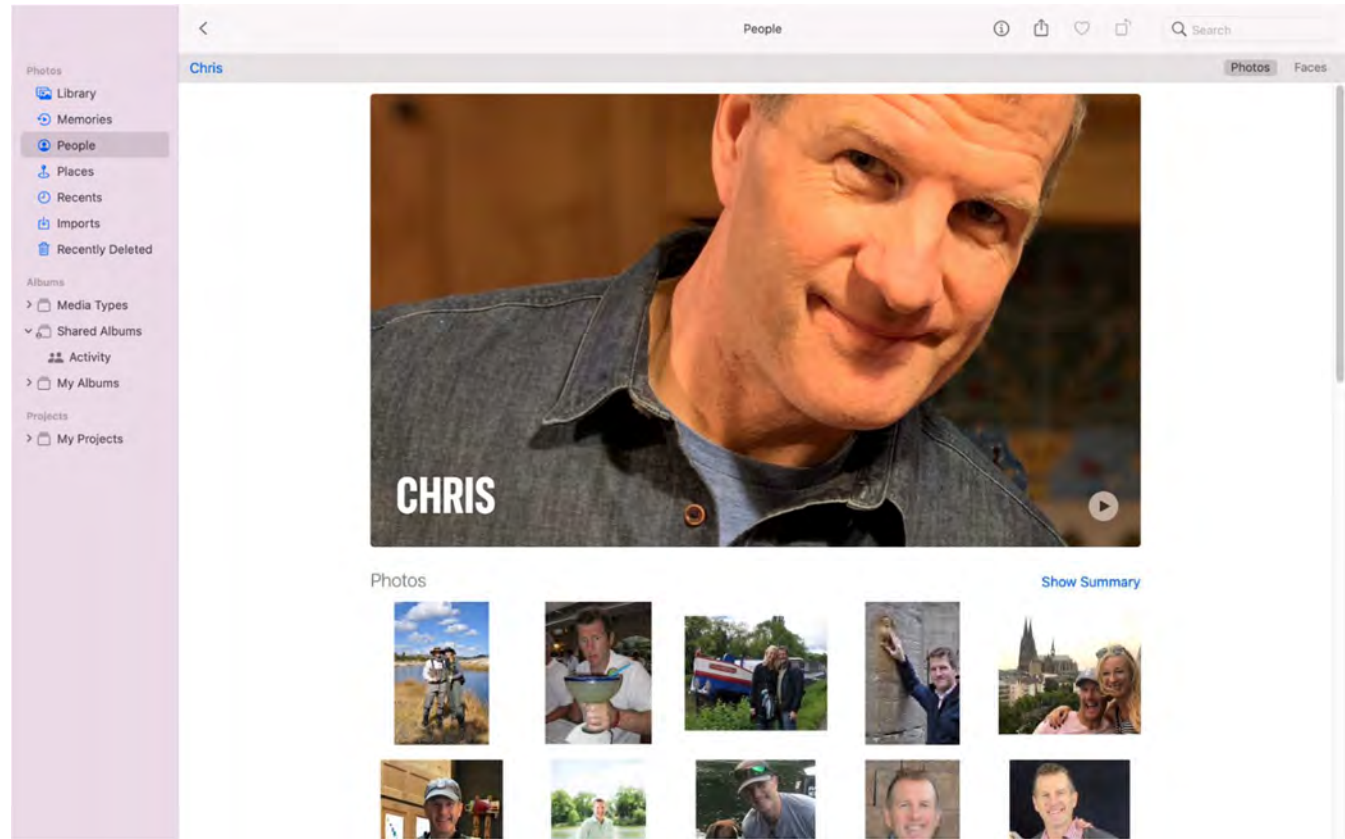
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

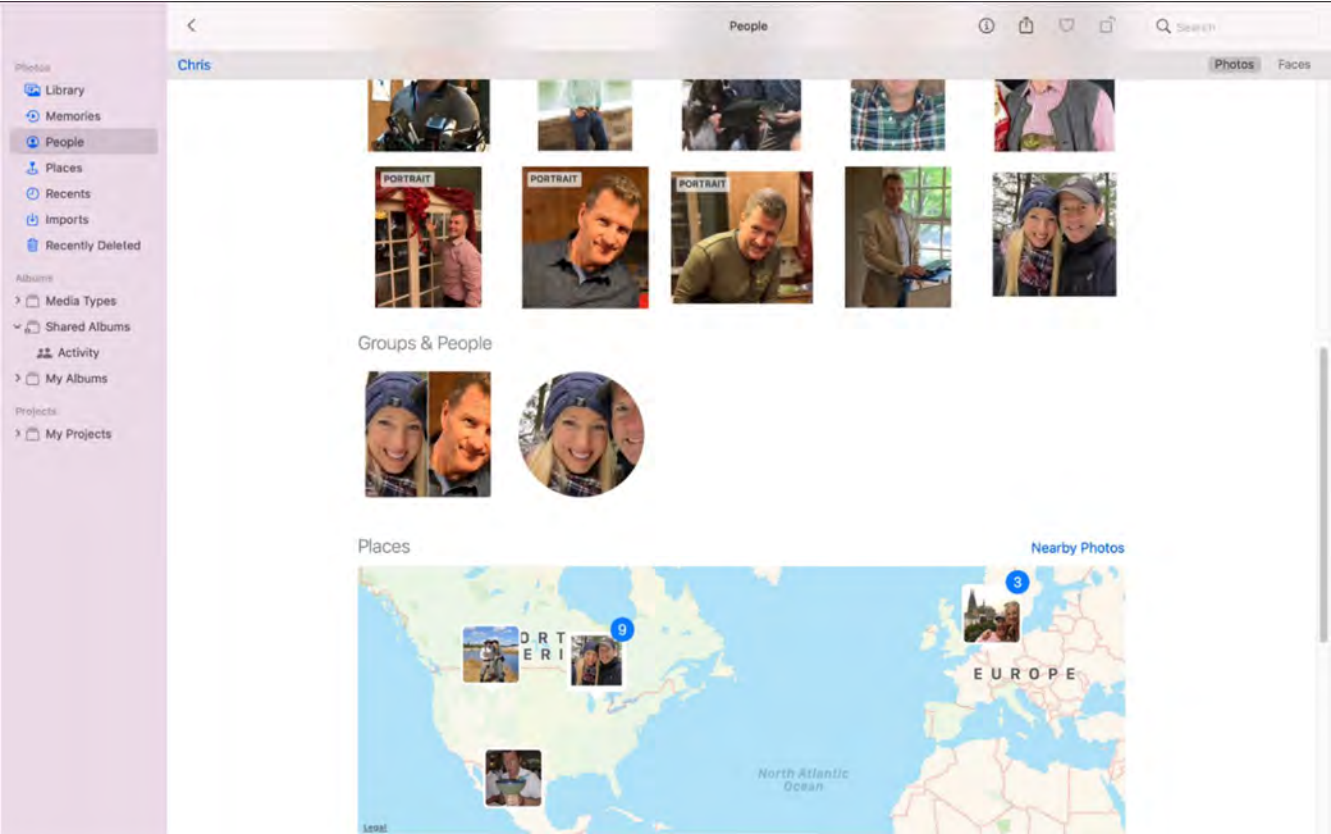
	
<p><b>31[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, macOS performs a method, as set forth below.</p>
<p><b>31[a]</b> causing an interface to display a people view, the people view including:</p>	<p>macOS causes an interface (e.g., Apple iPad) to display a people view.</p>

	
<p><b>31[a][i]</b> a first thumbnail image associated with a first person,  <b>31[a][ii]</b> a first name associated with the first person, <b>31[a][iii]</b> a second thumbnail image associated with a second person, and <b>31[a][iv]</b> a second name associated with the second person;</p>	<p>The people view includes (1) a first thumbnail image associated with a first person, (2) a first name associated with the first person, (3) a second thumbnail image associated with a second person, and (4) a second name associated with the second person.</p> 
<p><b>31[b]</b> responsive to an input that is</p>	<p>Responsive to an input that is indicative of a selection associated with the first person (e.g., tapping the first thumbnail image in the people view), macOS causes a first person view to be displayed on the interface.</p>

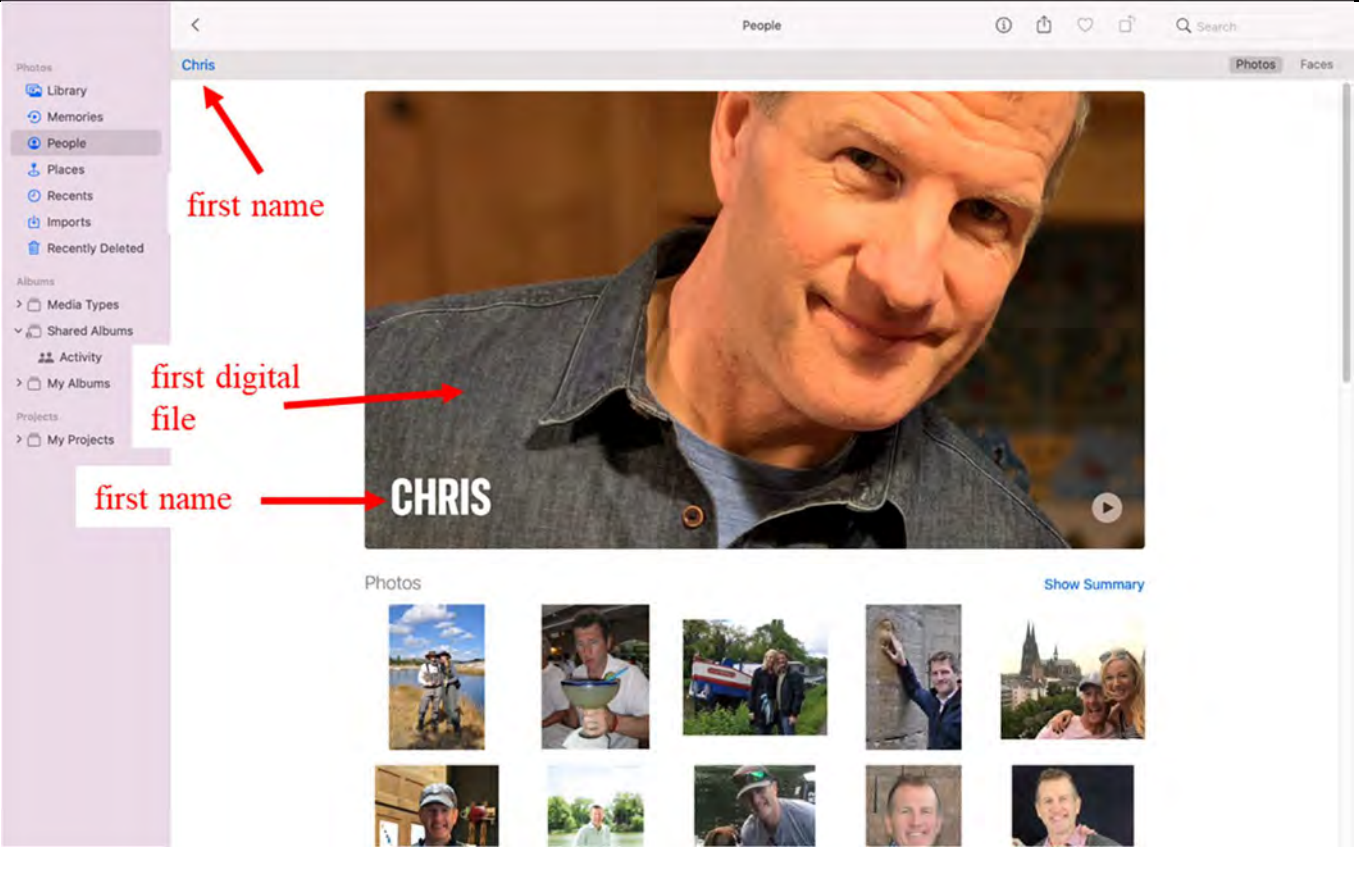


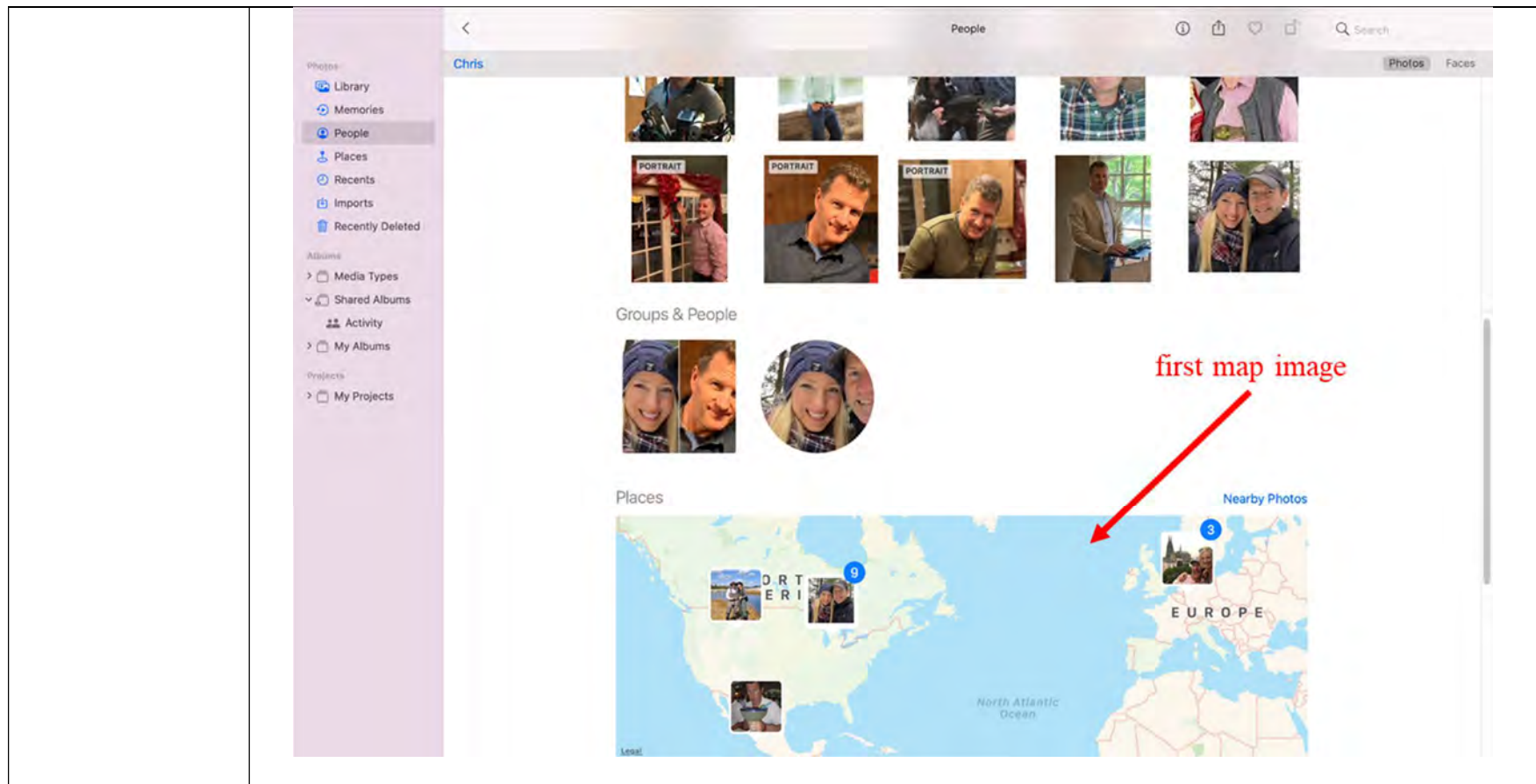
indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:



	
<p><b>31[b][i]</b> a first digital file associated with the first person, <b>31[b][ii]</b> the first name associated with the first person, and</p>	<p>The first person view includes a first digital file associated with the first person and the first name associated with the first person.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with categories: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The main area is titled 'People' and shows a profile for 'Chris'. A large photo of a man in a denim shirt is displayed, with the name 'CHRIS' overlaid at the bottom. Below this is a grid of smaller photos. Annotations with red arrows point to: 'Chris' in the top bar (labeled 'first name'), the main photo (labeled 'first digital file'), and the 'CHRIS' text overlay (labeled 'first name').</p>
<p><b>31[b][iii]</b> a first map image;</p>	<p>The first person view also includes a first map image.</p>

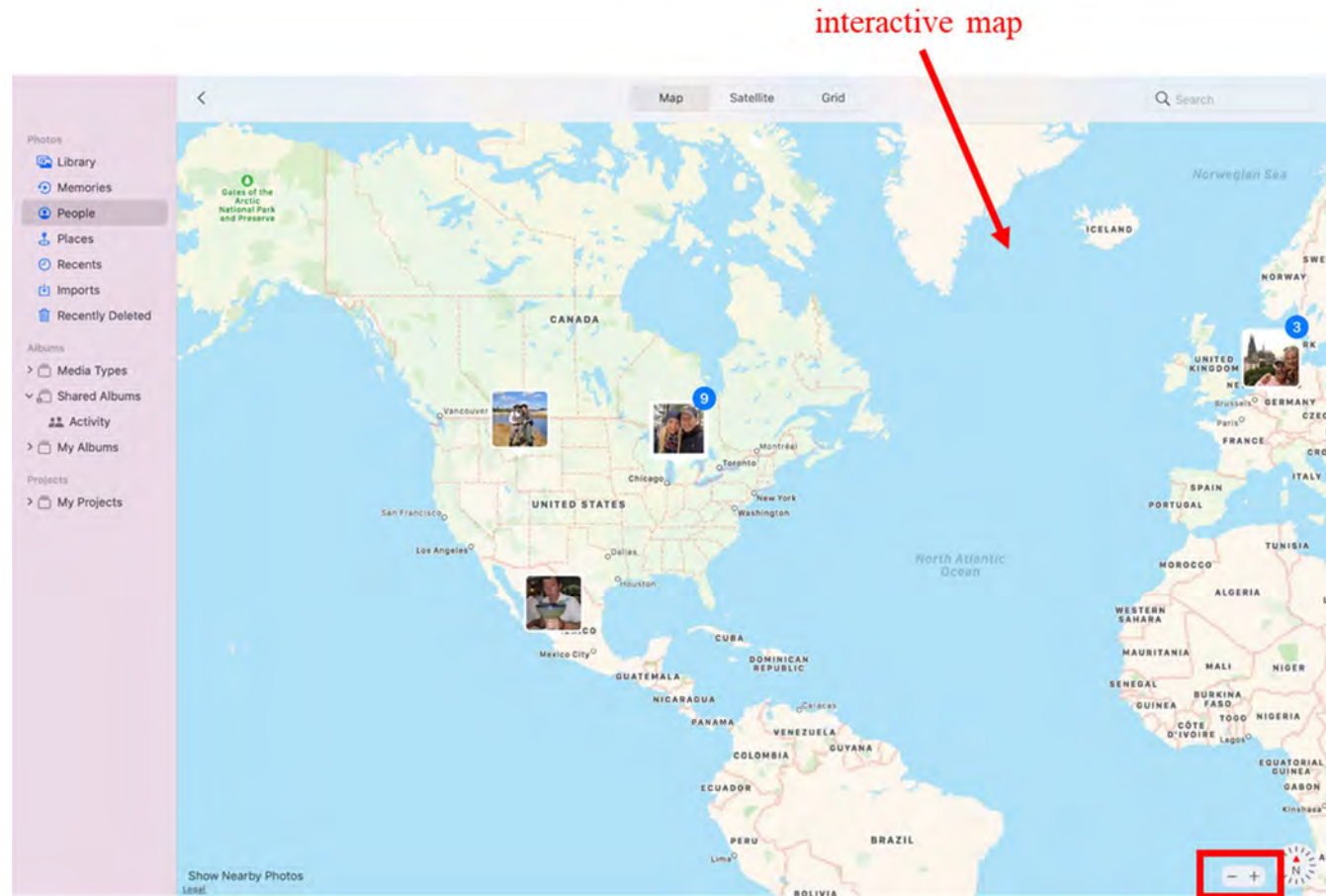


**31[c]** responsive to an input that is indicative of a selection of the first map image in the first person view, causing a first location view to be displayed on

Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), macOS causes a first location view to be displayed on the interface. The first location view includes an interactive geographic map. The geographic is interactive in that macOS can zoom in or out, or move side to side.



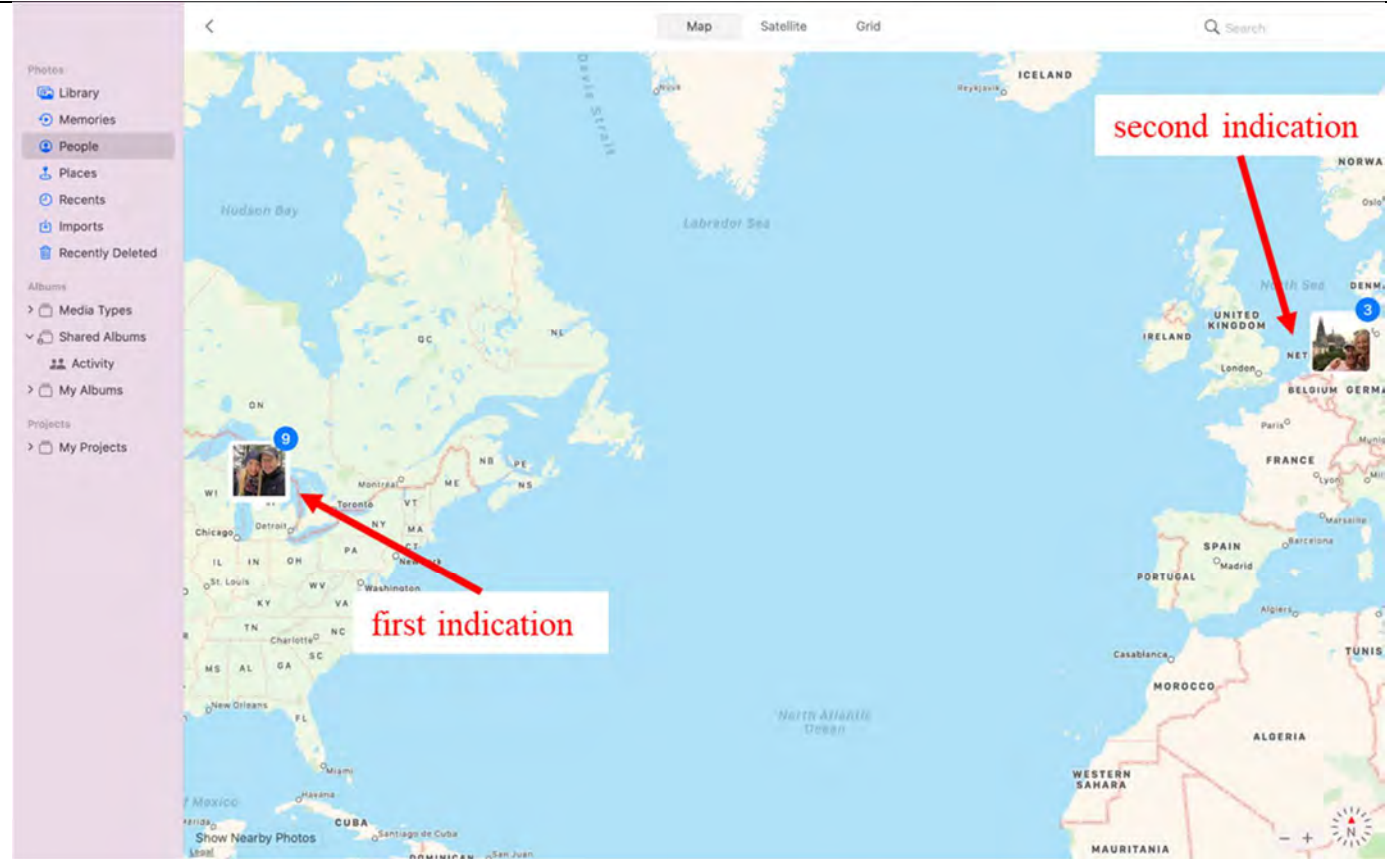
the interface, the first location view including:



31[c][i] an interactive geographic map, 31[c][ii] a first indication positioned at a first location on

The first location view includes a first indication positioned at a first location on the interactive geographic map and a second indication positioned at a second location on the interactive geographic map.

the interactive geographic map, and **31[c][iii]** a second indication positioned at a second location on the interactive geographic map;

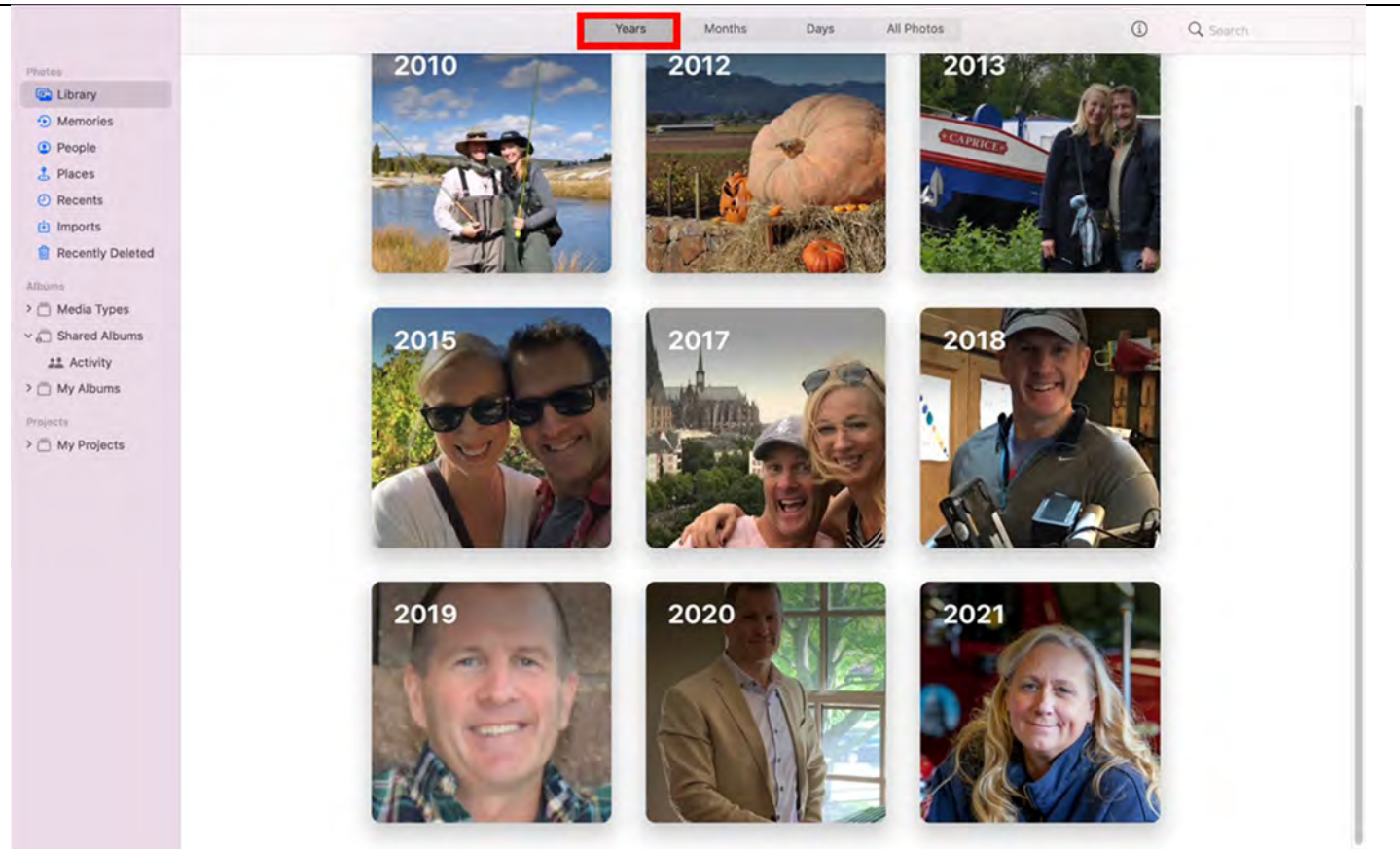


**31[d]** responsive to receiving a year input, grouping a plurality of digital files based on year and causing at least one of the plurality of digital files to be

Responsive to receiving a year input (e.g., clicking the “Years” element), macOS groups the plurality of digital files based on year and causes at least one of the plurality of digital files to be displayed on the interface.



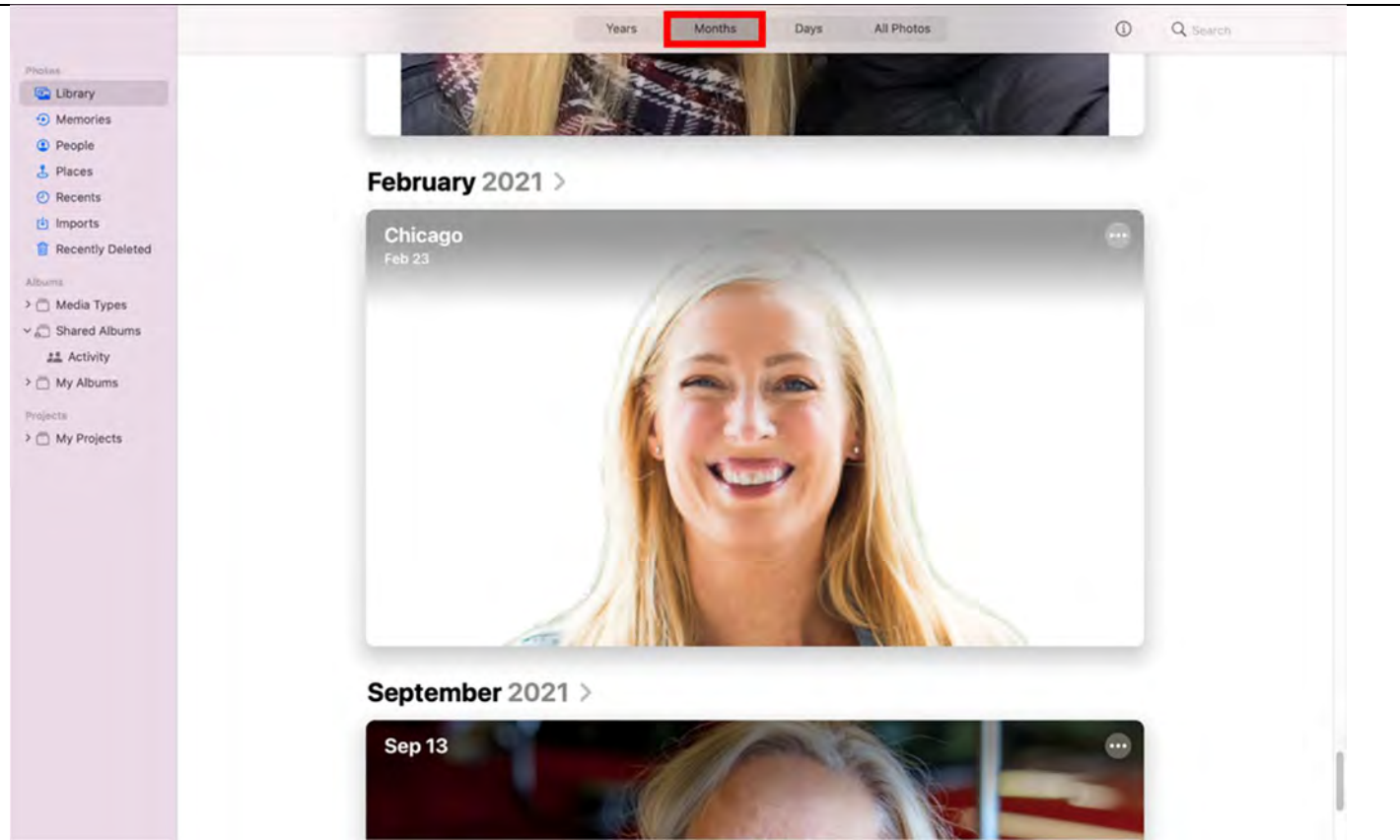
displayed on the interface;



**31[e]** responsive to receiving a month input, grouping the plurality of digital files based on month and causing at least one of the plurality of digital files to be

Responsive to receiving a month input (e.g., clicking the “Months” element), macOS groups the plurality of digital files based on month and causes at least one of the plurality of digital files to be displayed on the interface.

displayed on the interface; and

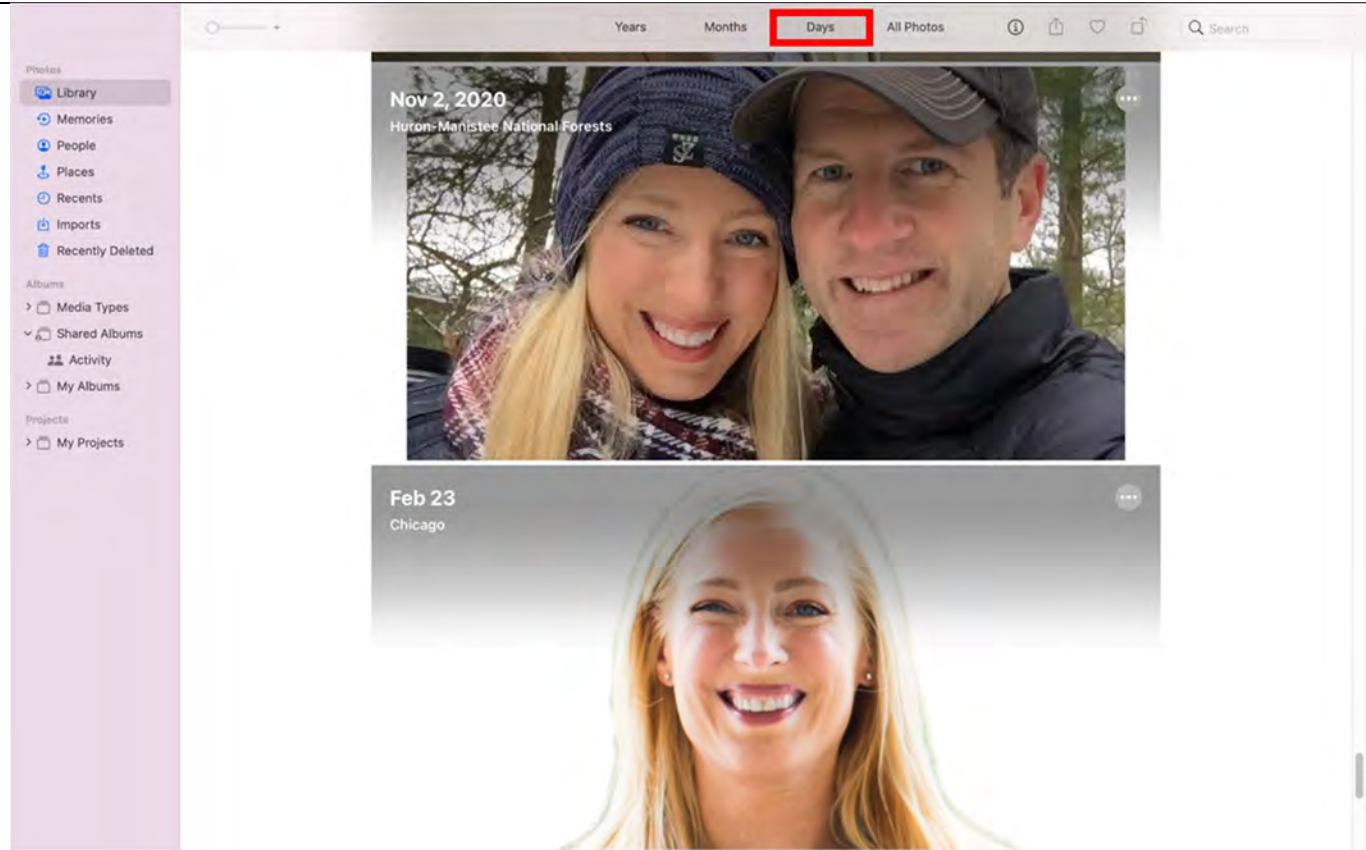


**31[f]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital files to be

Responsive to receiving a day input (e.g., clicking the “Days” element), macOS groups the plurality of digital files based on day and causes at least one of the plurality of digital files to be displayed on the interface.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

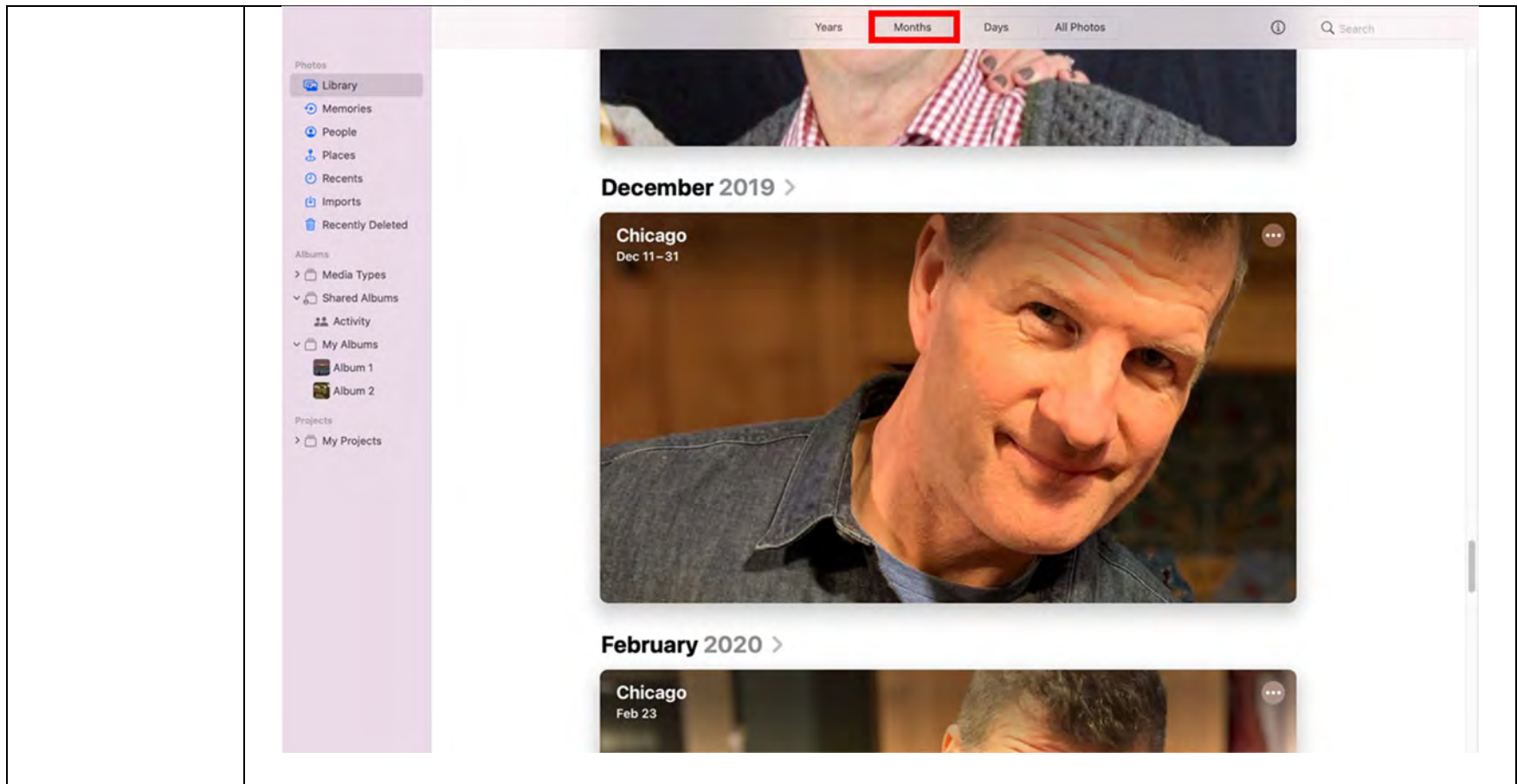
displayed on the interface.



**32.** The method of claim 31, wherein the first digital file is included in the plurality of digital files.

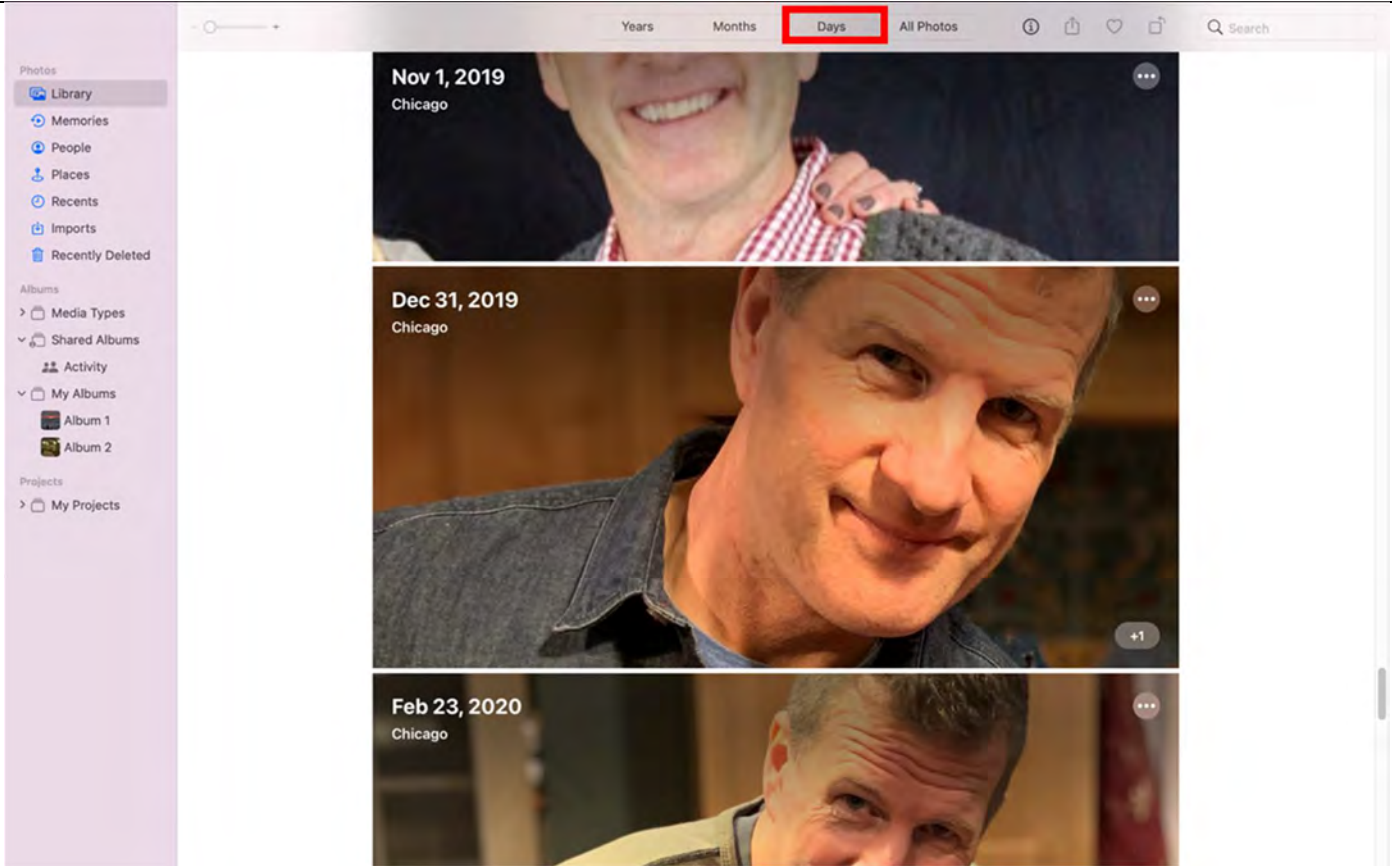
The first digital file (*see* limitation 31[b][i]) is included in the plurality of digital files that are grouped by year, month, or day.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

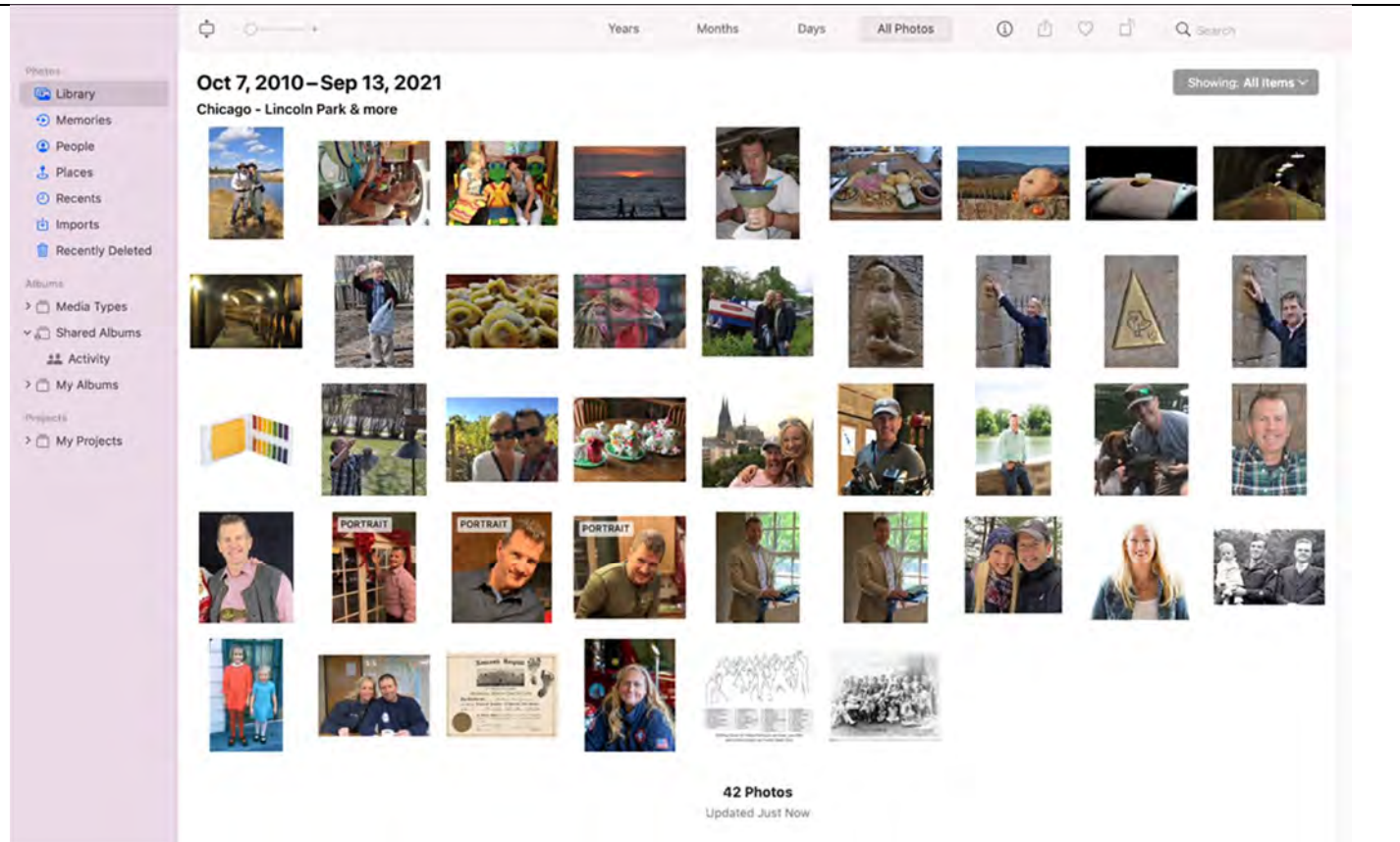




Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	
<p><b>33.</b> The method of claim 31, further comprising causing the interface to display an interactive timeline view prior to receiving the</p>	<p>macOS causes the interface to display an interactive timeline view prior to receiving the year input, prior to receiving the month input, and prior to receiving the day input, the interactive timeline view permitting a user to provide the year input, the month input, the day input, or any combination thereof to group the plurality of digital files.</p>

year input, prior to receiving the month input, and prior to receiving the day input, the interactive timeline view permitting a user to provide the year input, the month input, the day input, or any combination thereof to group the plurality of digital files.

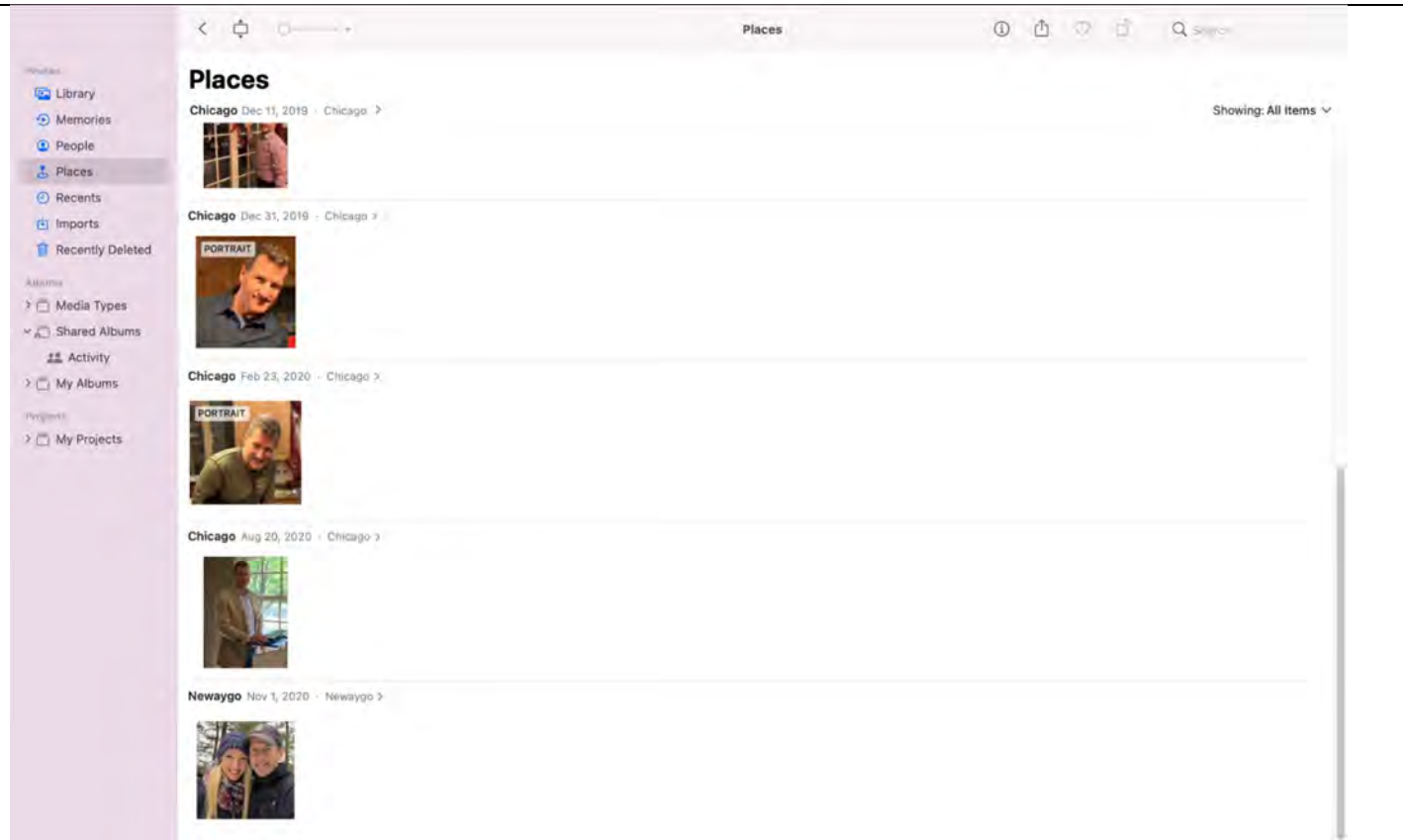


**34.** The method of claim 31, wherein the first indication is associated with a first set of digital files and the first location, and the second indication

The first indication is associated with a first set of digital files and the first location. For example, macOS causes the view below to be displayed responsive to a touch/tap of the first indication.

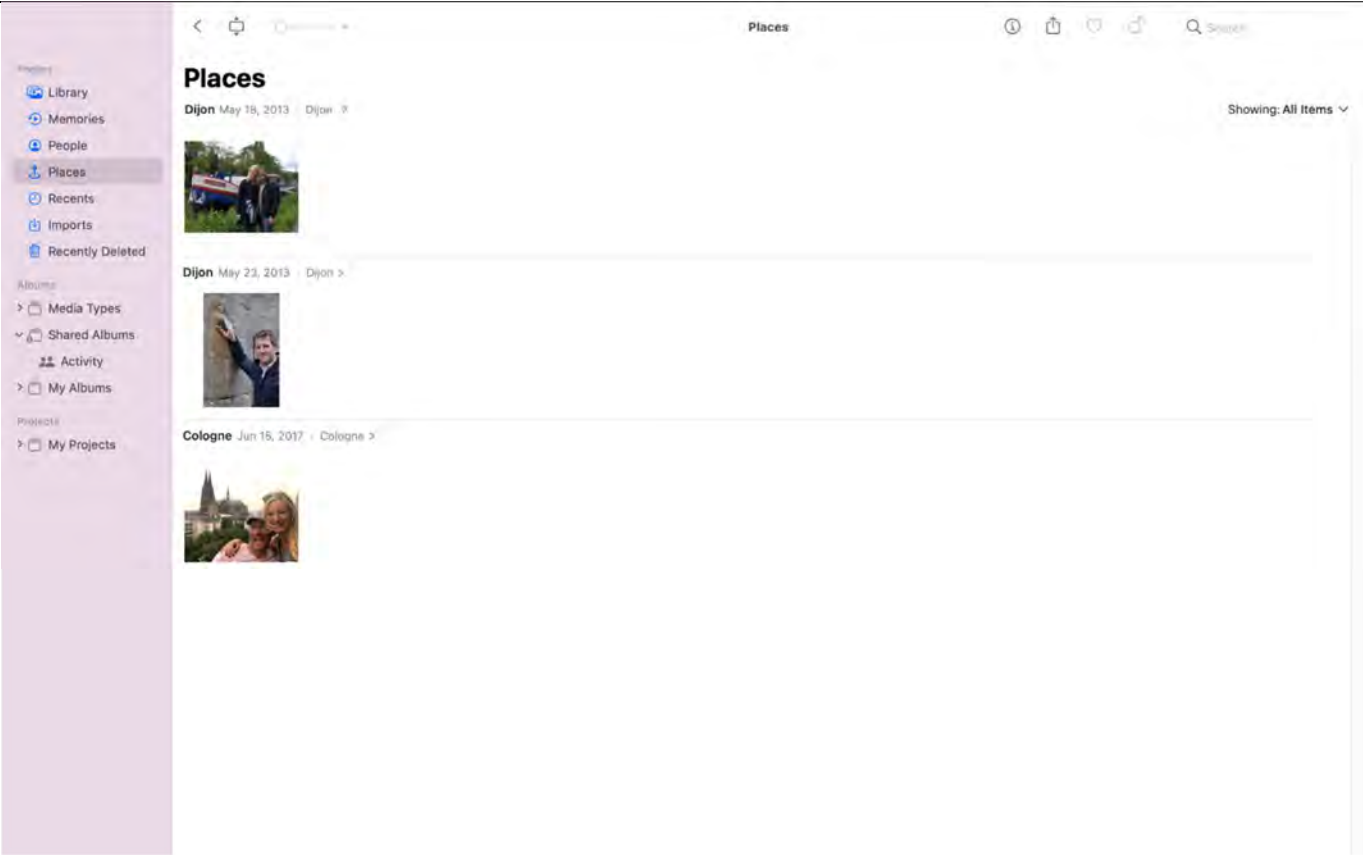


is associated with a second set of digital files and the second location.



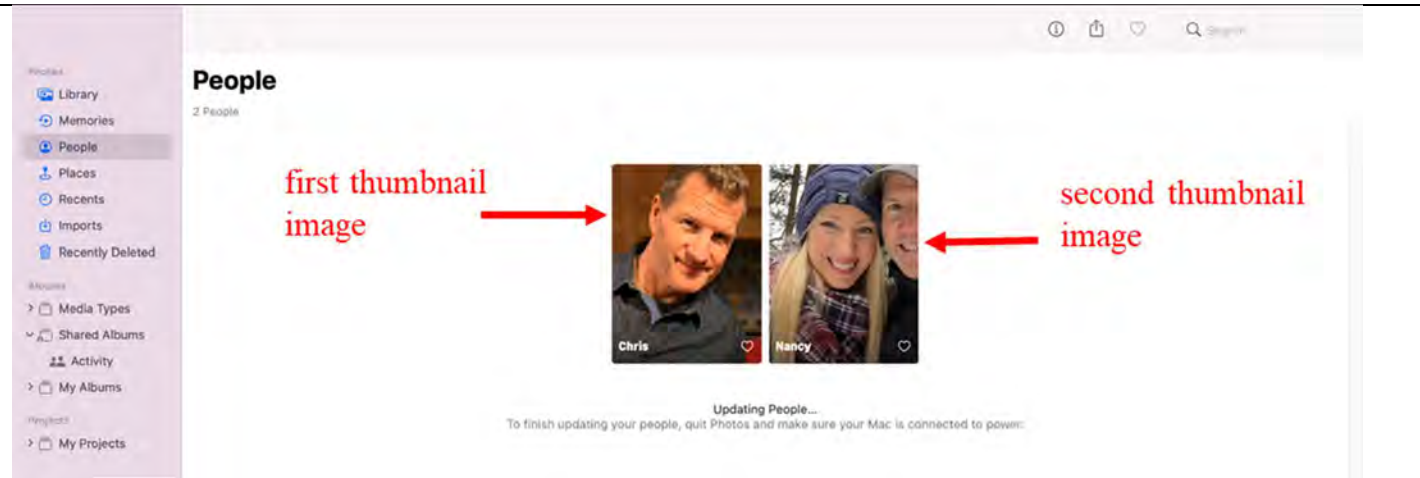
The second indication is associated with a second set of digital files and the second location. For example, macOS causes the view below to be displayed responsive to a touch/tap of the second indication.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	
<p><b>35.</b> The method of claim 34, wherein the first set of digital files and the second set of digital files are associated with the first person.</p>	<p>The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first person is included in photographs in the first and second sets of digital files.</p>

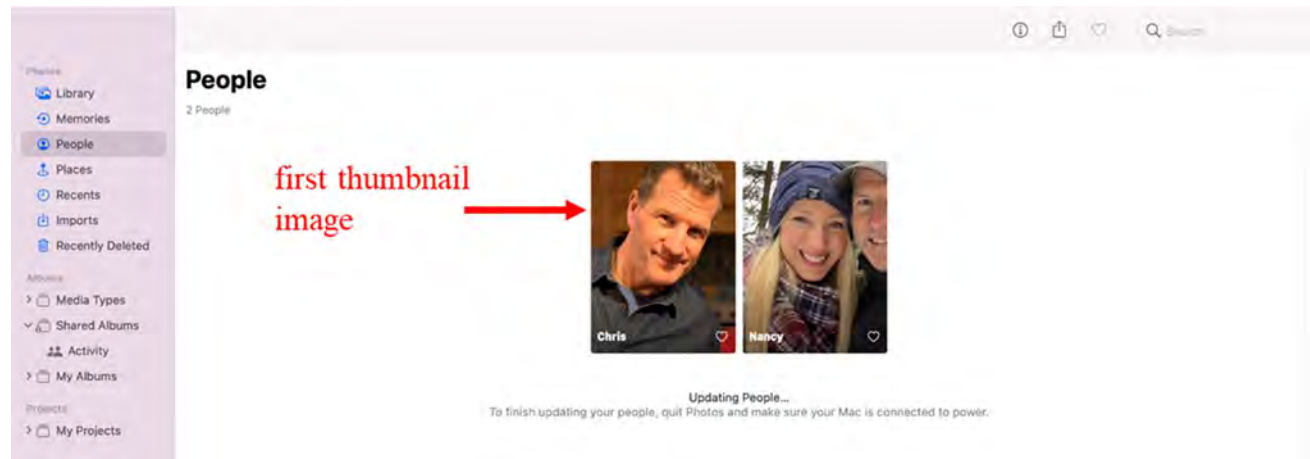
<p><b>36.</b> The method of claim 35, wherein the first thumbnail image includes at least a portion of a face of the first person and the</p>	<p>The first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>

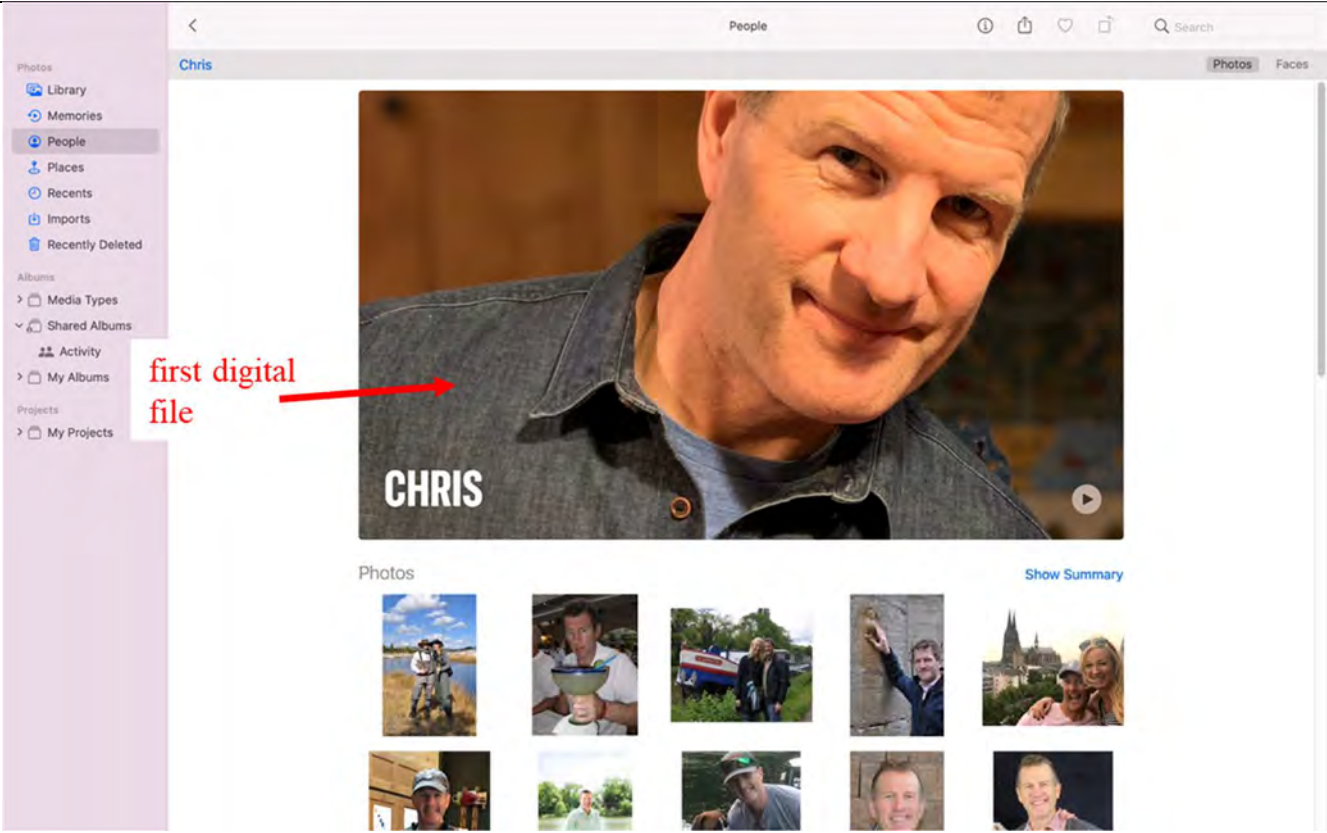
second thumbnail images includes at least a portion of a face of the second person.



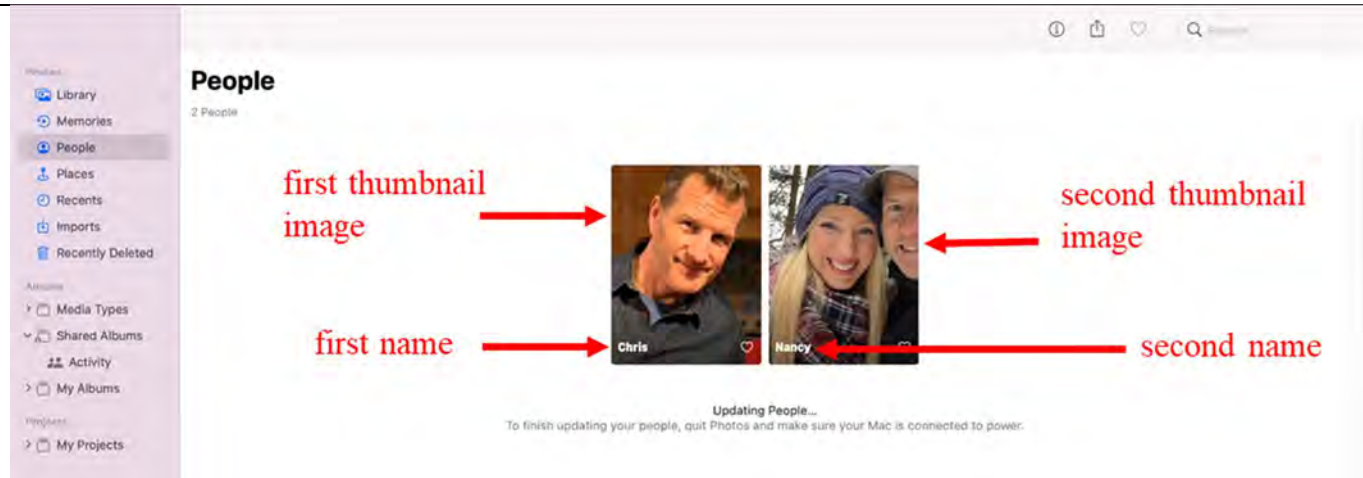
37. The method of claim 36, wherein the first thumbnail image includes at least a portion of the first digital file.

The first thumbnail image in the people view includes at least a portion of the first digital file in the first person view.



	 <p>The screenshot shows the macOS Photos app interface in 'People' view. On the left is a sidebar with categories like Photos, Albums, and Projects. The main area displays a large portrait of a man named Chris. A red arrow points to the name 'CHRIS' overlaid on the bottom left of the portrait, with the text 'first digital file' next to it. Below the main image is a grid of smaller photo thumbnails. The top of the window shows navigation icons and a search bar.</p>
<p><b>38.</b> The method of claim 36, wherein, in the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image</p>	<p>In the people view, the first name is displayed adjacent to the first digital file associated with the first thumbnail image and the second name is displayed adjacent to the second thumbnail image.</p>

and the second name is displayed adjacent to the second thumbnail image.



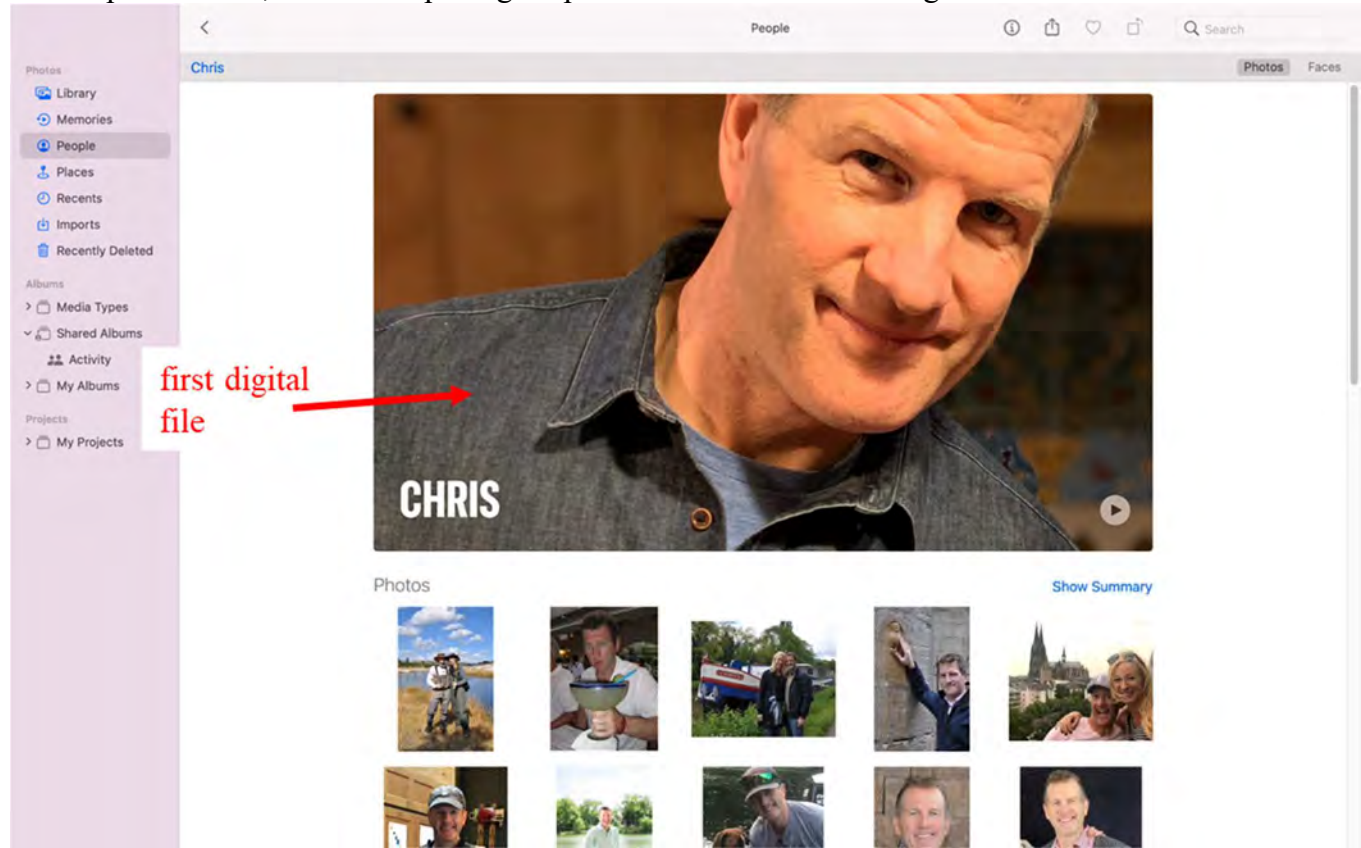
To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate the name of the first person that is associated with the first thumbnail image. The way the claimed displaying performs this function is by displaying the first name in sufficient proximity to the first thumbnail image such that a user will associate the first name with the first thumbnail image. The result of the claimed displaying is that the first name is associated with the first thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name is to communicate the name of the second person that is associated with the second thumbnail image. The way the claimed displaying performs this function is by displaying the second name in sufficient proximity to the second thumbnail image such that a user will associate the second name with the second thumbnail image. The result of the claimed displaying is that the second name is associated with the second thumbnail image. macOS performs substantially the same function, in substantially the same way, to achieve substantially the same result.

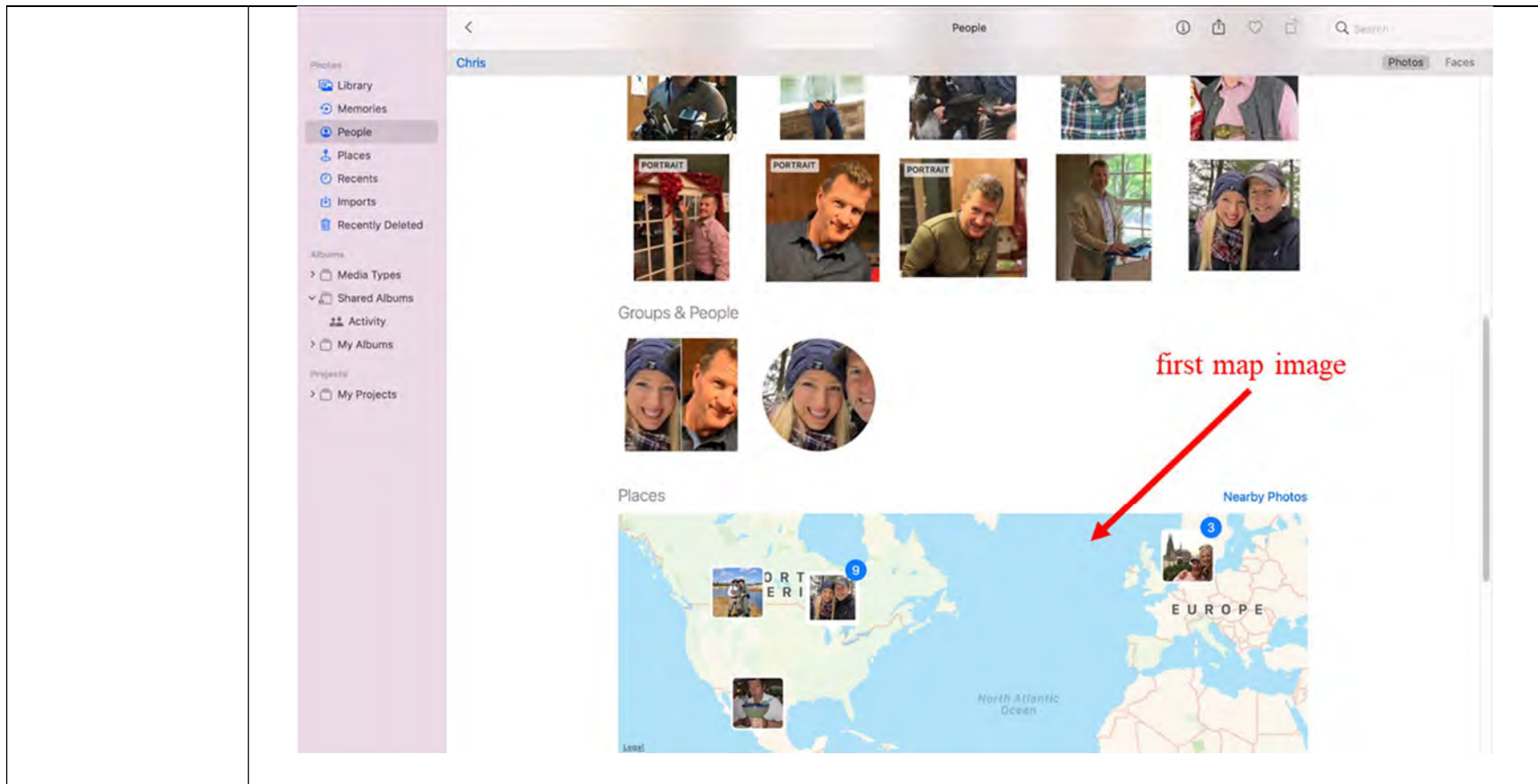


39. The method of claim 38, wherein, in the first person view, the first map image is positioned below the first digital file.

In the first person view, the first map image is positioned below the first digital file.



Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



**40[pre]** The method of claim 31, further comprising,

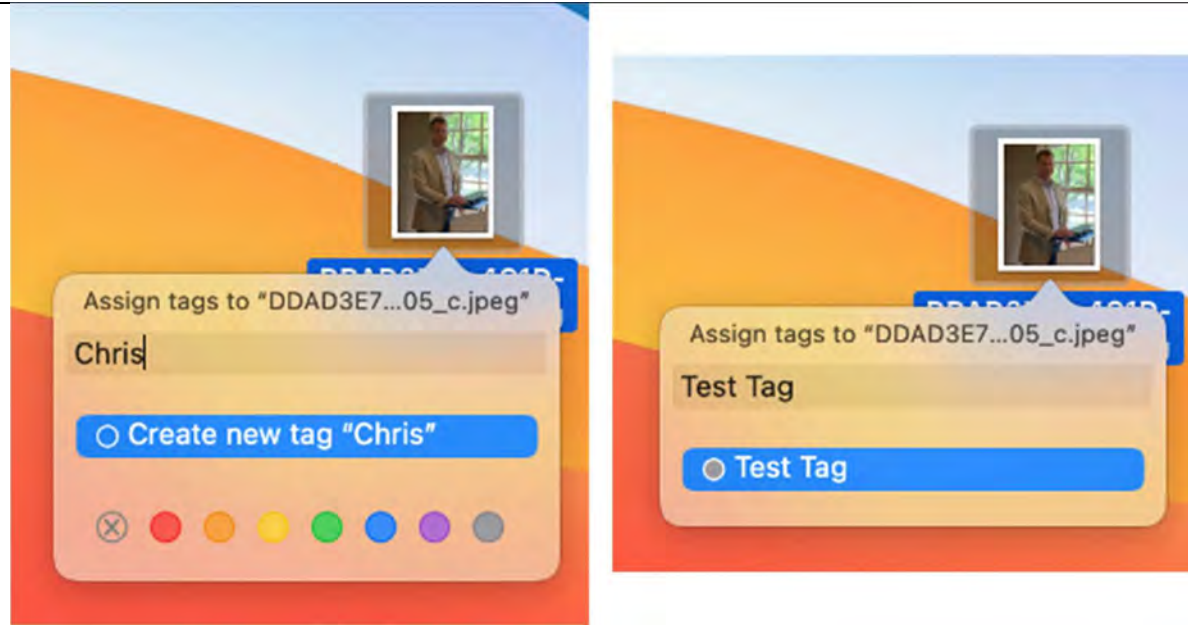
*See information for claim 31.*

**40[a]** prior to the causing the interface to display the people view:

Prior to the causing the interface to display the people view, macOS causes the first digital file to be displayed on the interface.

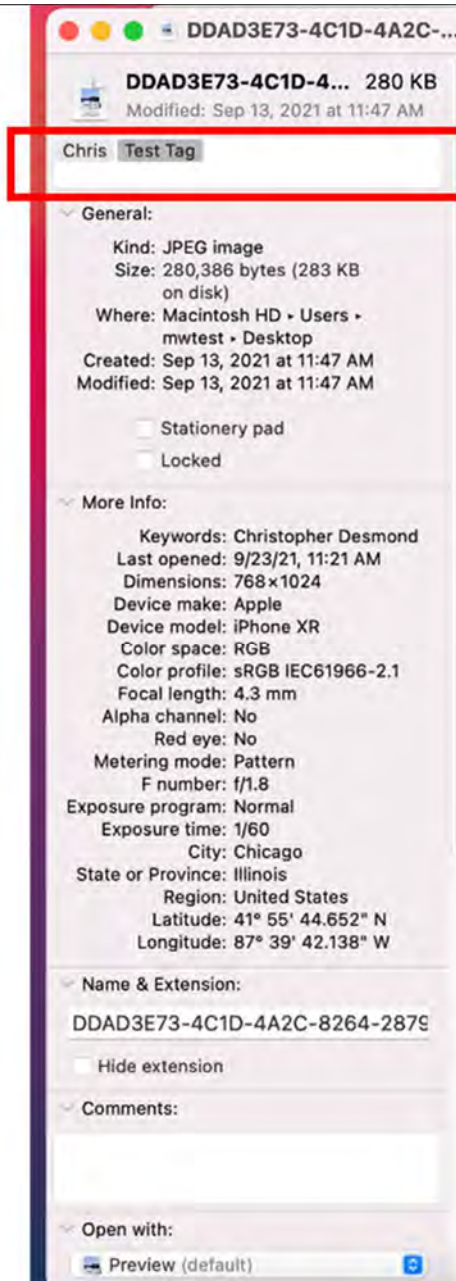
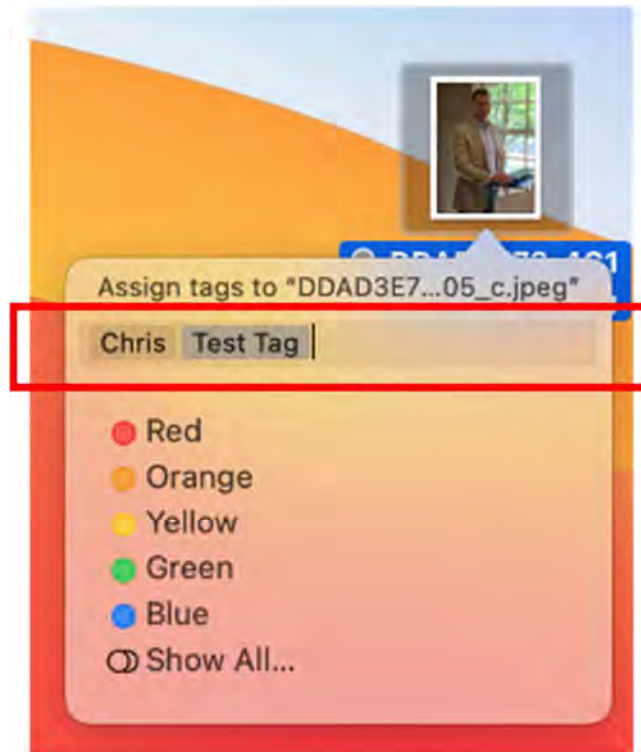


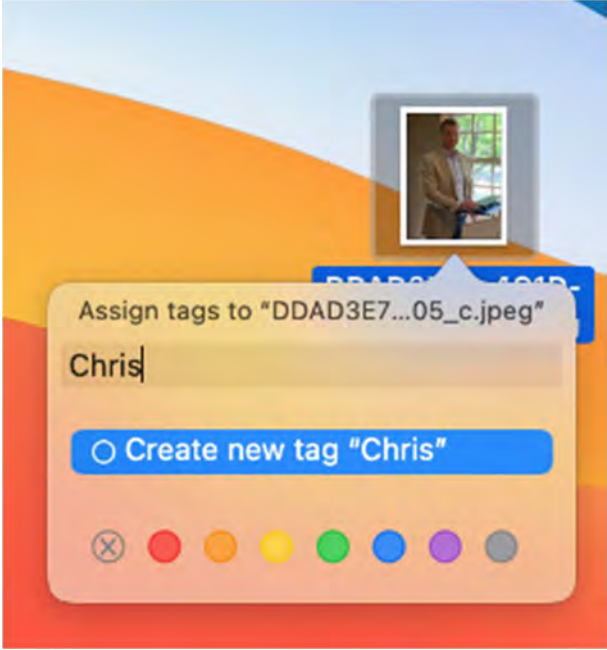
40[b] receiving alphanumeric text as a first user-generated tag; and






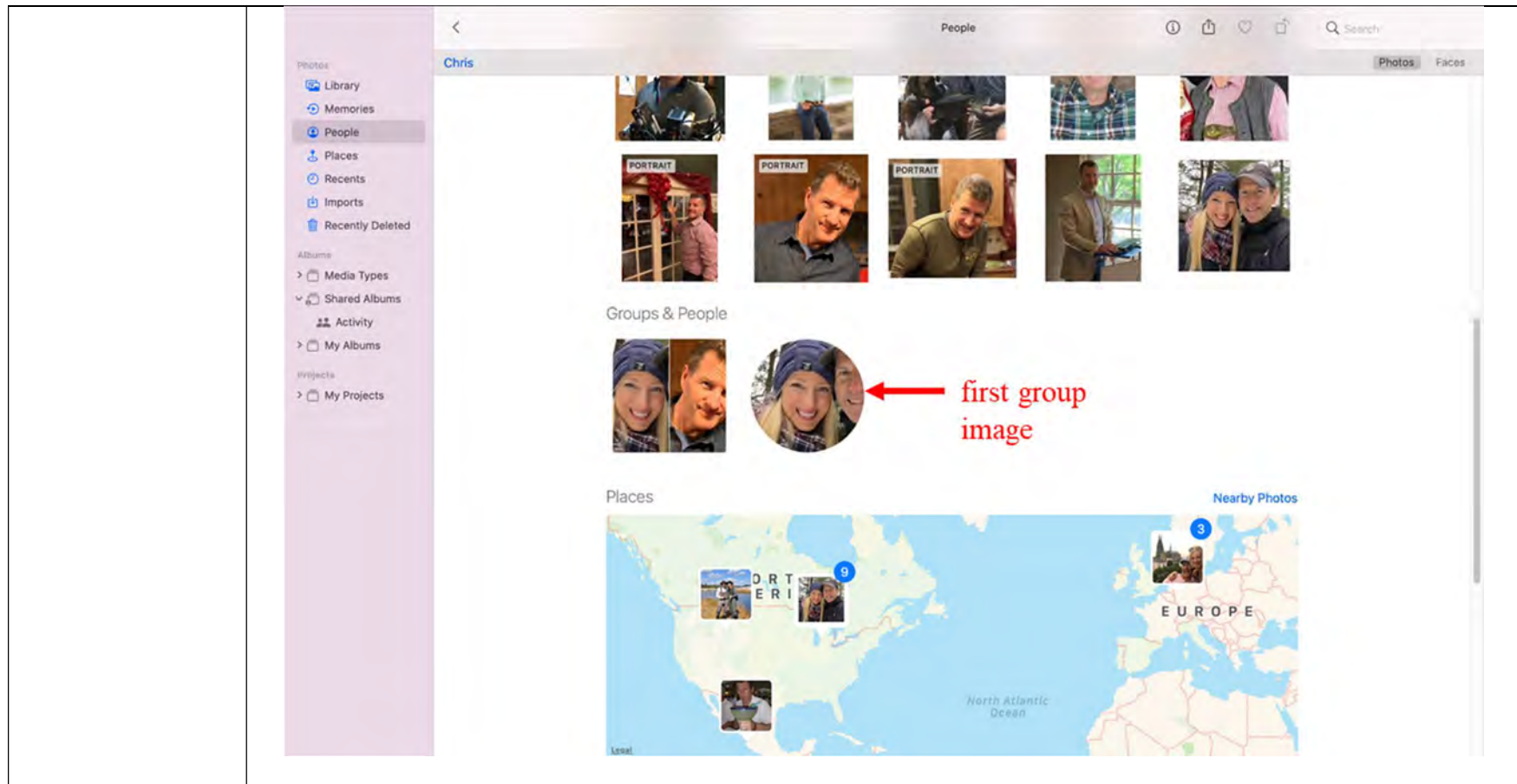
40[c] associating the first digital file with the first user-generated tag.



<p><b>41.</b> The method of claim 40, wherein the first user-generated tag includes the name of the first person.</p>	<p>The first user-generated tag includes the name of the first person.</p>  <p>The image shows a macOS file tagging dialog box. At the top, it says "Assign tags to 'DDAD3E7...05_c.jpeg'". Below that, the name "Chris" is entered into a text field. A blue button with a radio button icon and the text "Create new tag 'Chris'" is visible. At the bottom of the dialog are standard macOS window control buttons: a close button (X), a red button, an orange button, a yellow button, a green button, a blue button, a purple button, and a grey button.</p>
<p><b>42.</b> The method of claim 41, further comprising exporting the first digital file to a remote device, the exported first digital file including information associated with the</p>	<p>macOS exports the first digital file to a remote device, and the exported first digital file includes information associated with the first user-generated tag. For example, macOS can export the first digital file to a remote device such as an Apple iPhone (e.g., via AirDrop). Information associated with the first user-generated tag is exported to the iPhone, as shown below.</p>



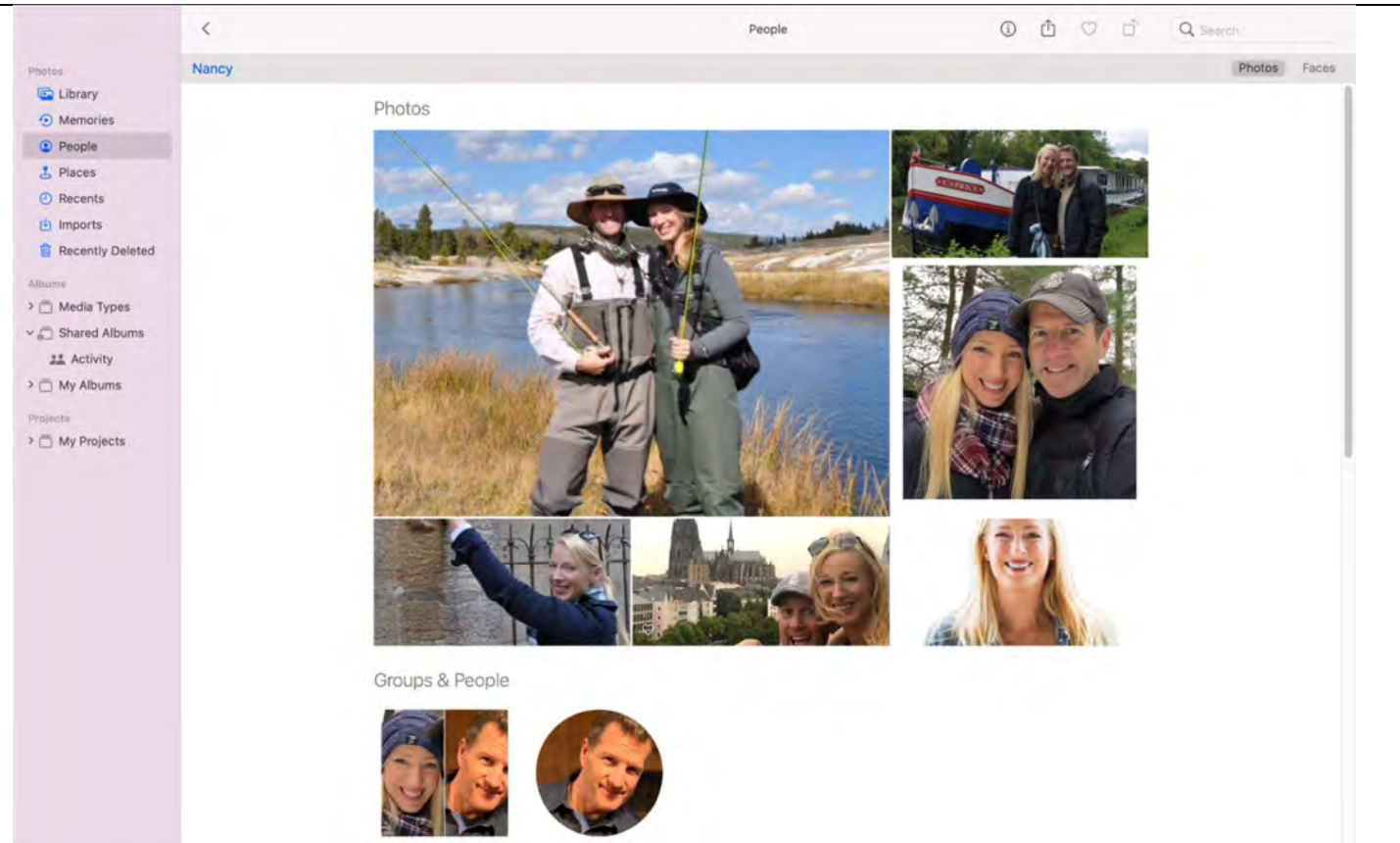
<p>first user-generated tag.</p>	 <p>The screenshot shows the 'Info' page for a photo on an iPhone. The settings listed are: Lens (iPhone XR back camera 4.25mm f/1.8), Aperture value (1.696), Exposure time (1/60), Exposure program (Normal), Focal length (4.3 mm), ISO speed (80), Flash (NO), Ref eye (NO), f Number (f/1.8), Metering mode (Pattern), White balance (Auto), Content Creator (13.6), Longitude (87° 39' 42.144" W), and Latitude (41° 55' 44.653" N). At the bottom, there is a 'Tags' section with a red box around it, containing the text 'Chris Test Tag' and an 'Add Tags' button.</p>
<p><b>43[pre]</b> The method of claim 31, wherein</p>	<p><i>See</i> information for claim 31.</p>
<p><b>43[a]</b> the first person view includes a first group image and</p>	<p>The first person view includes a first group image.</p>



**43[b]** responsive to an input that is indicative of a selection of the first group image, causing a first group view to be displayed on the interface, the first

Responsive to an input that is indicative of a selection of the first group image (e.g., tapping the first group image), macOS causes a first group view to be displayed on the interface, the first group view including one or more digital files associated with another person that is associated with the first person.

croup view including one or more digital files associated with another person that is associated with the first person.



44. The method of claim 43, wherein the another person is the second person.

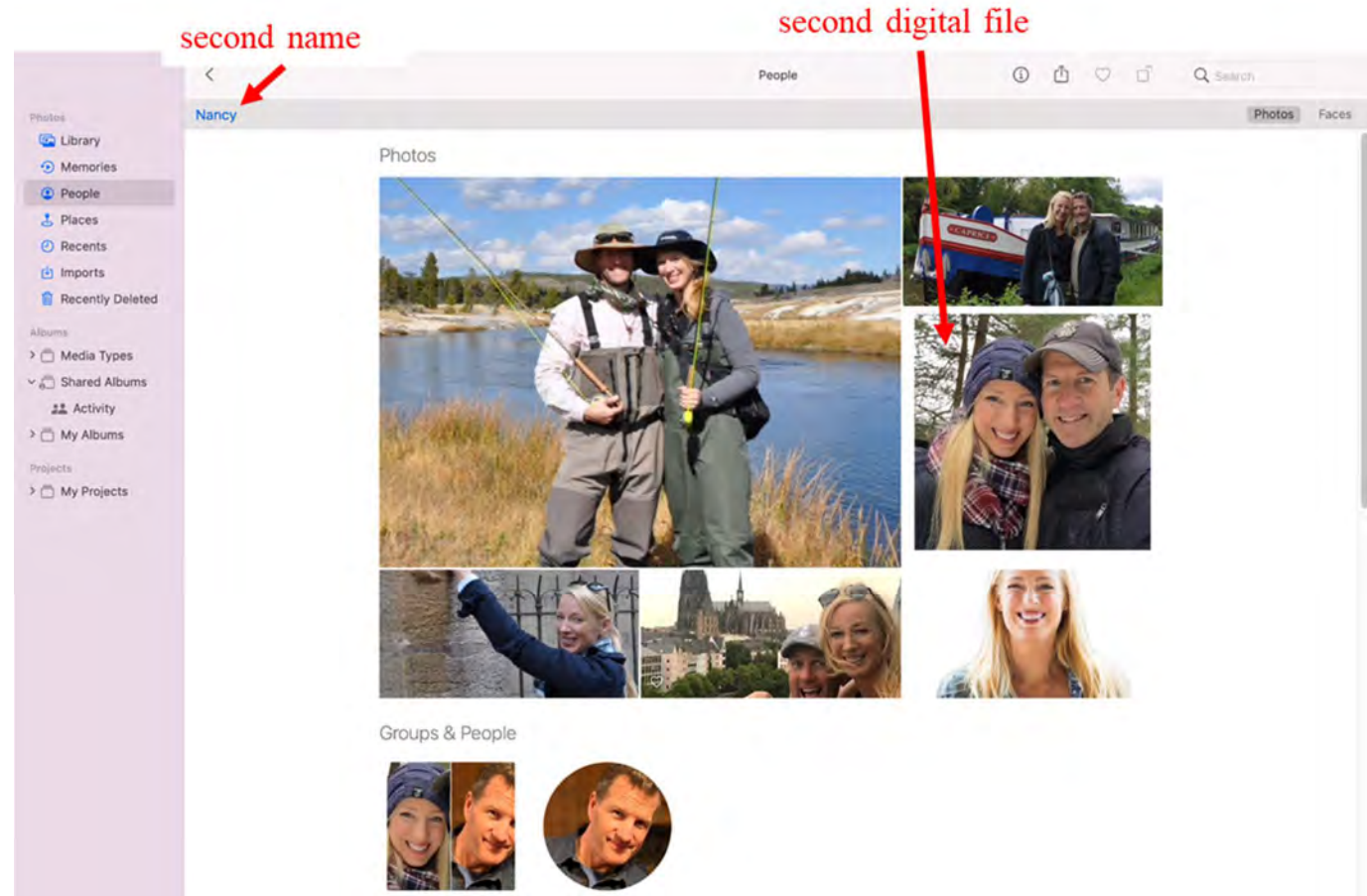
The another person is the second person. See information for limitations 31[a][iii]-[iv] and claim 43.

45. The method of claim 35, further

Responsive to an input that is indicative of a selection associated with the second person, macOS causes a second person view to be displayed on the interface, the second person view including the second digital file

comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second person, and a second map image.

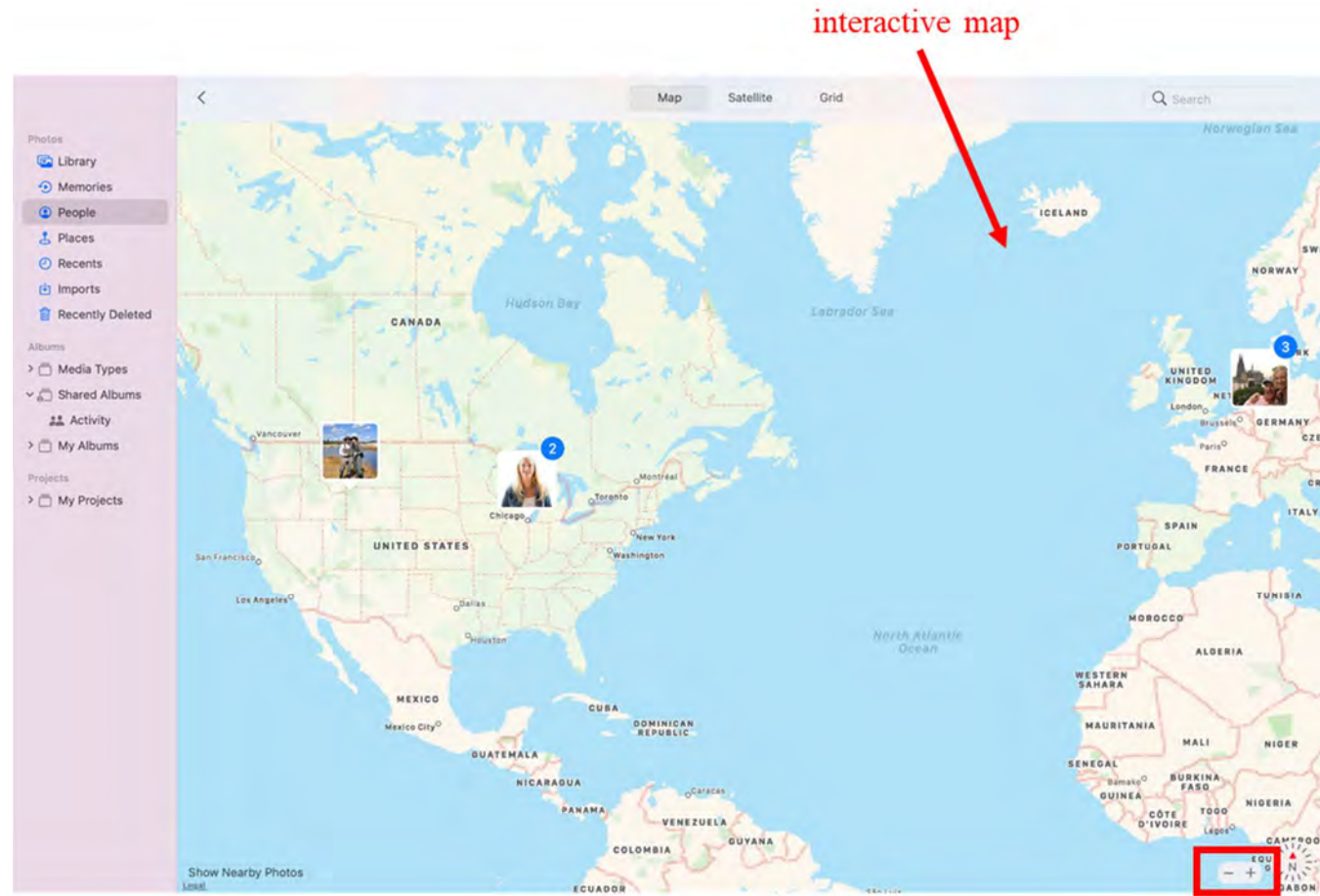
associated with the second person, the second name associated with the second person, and a second map image.



	<p>The screenshot shows the macOS Photos app interface. At the top, the name 'Nancy' is displayed in the header bar, with a red arrow pointing to it and the label 'second name' above. Below the header is a grid of photos. Underneath the photos is a 'Groups &amp; People' section showing profile pictures of individuals. At the bottom is a 'Places' section featuring a map of North America and Europe. A red arrow points to a location marker on the map, labeled 'second map image'.</p>
<p><b>46[pre]</b> The method of claim 45, further comprising:</p>	<p>See information for claim 45.</p>
<p><b>46[a]</b> responsive to an input that is indicative of a</p>	<p>Responsive to an input that is indicative of a selection of the second map image in the second person view (e.g., tapping the second map image), macOS causes a second location view to be displayed on the interface.</p>



selection of the second map image, causing a second location view to be displayed on the interface, 46[b] the second location view including: the interactive geographic map,

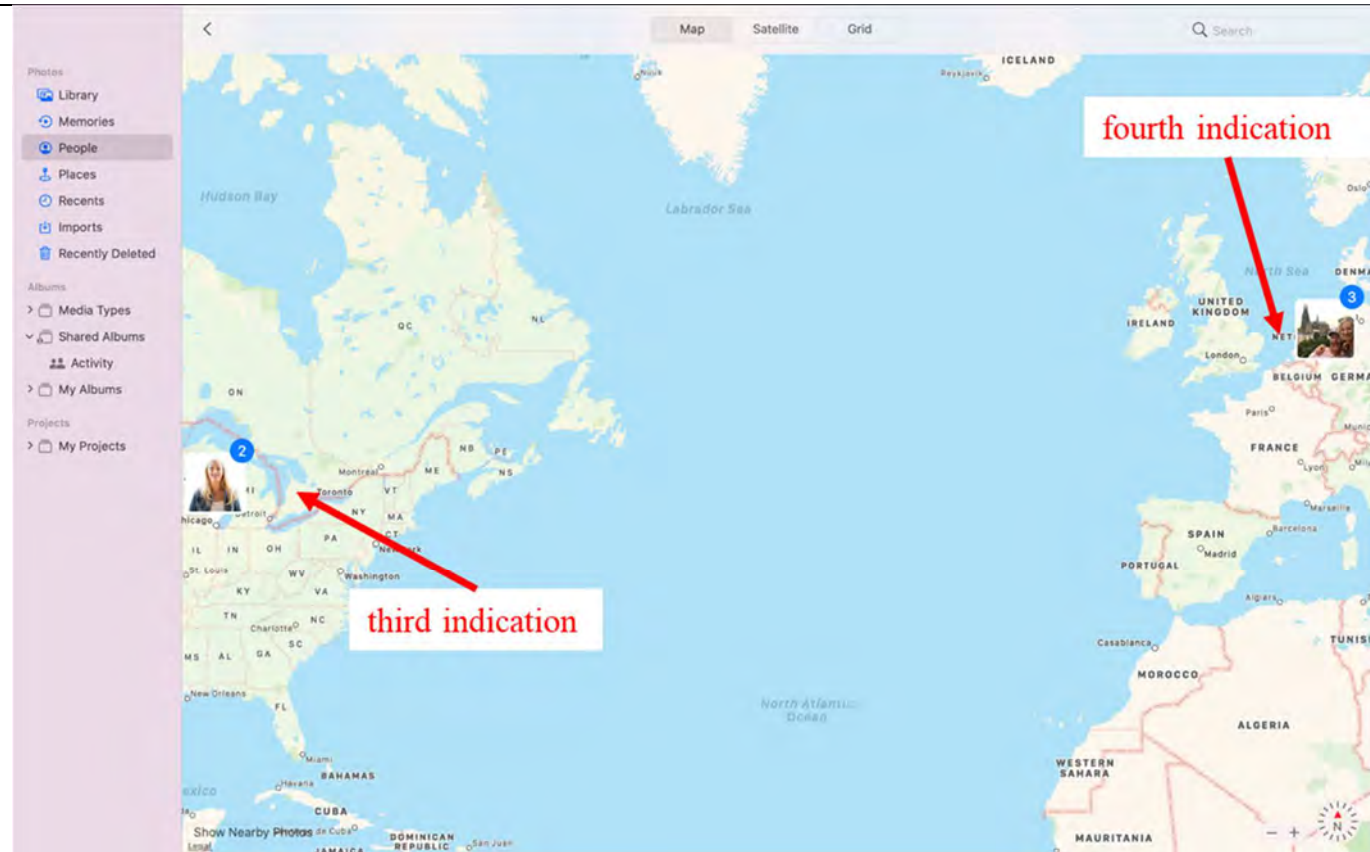


46[c] a third indication positioned at a third location on the interactive geographic map, and

The second location view includes the interactive geographic map, a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.



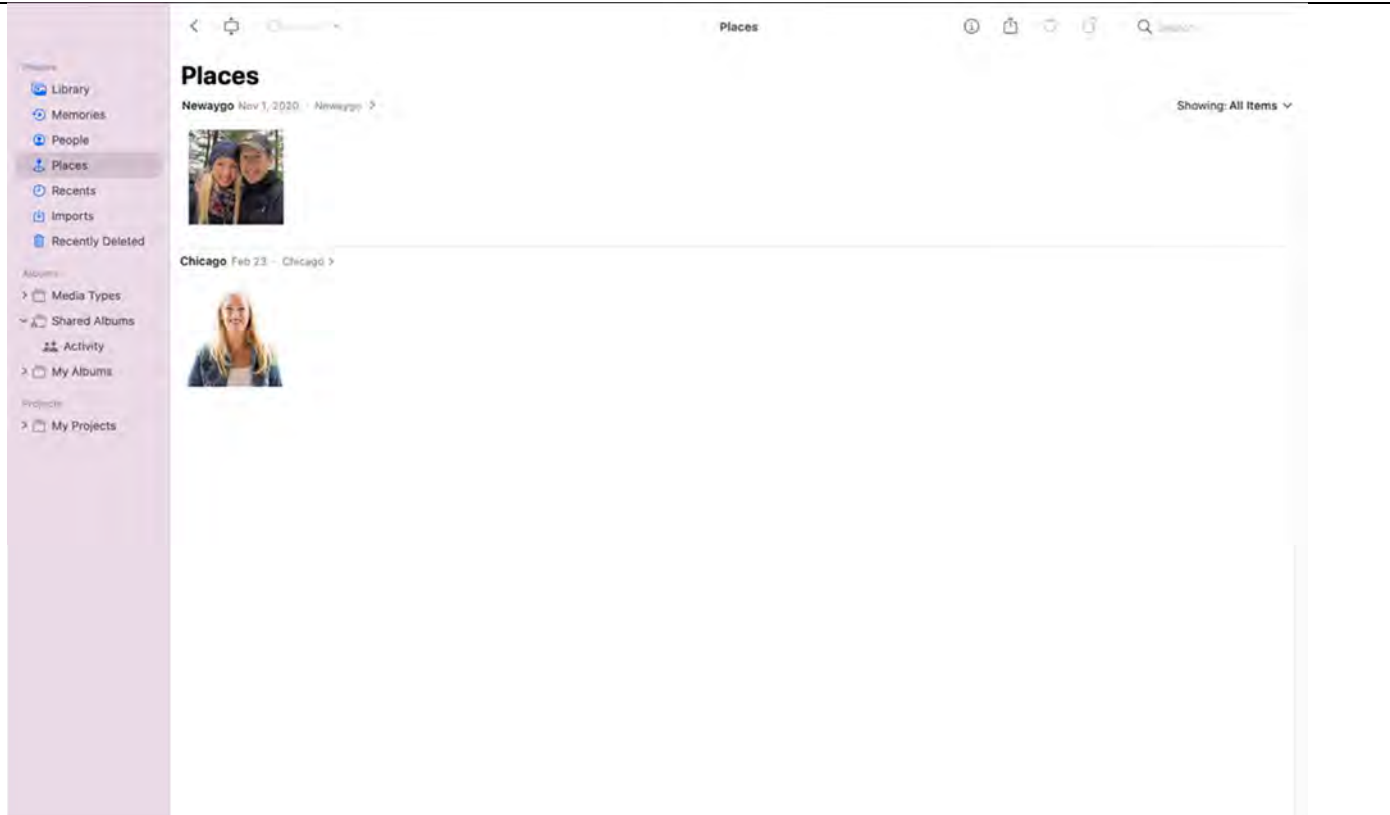
46[d] a fourth indication positioned at a fourth location on the interactive geographic map.



47. The method of claim 46, wherein the third indication is associated with a third set of digital files and the third location, and the fourth

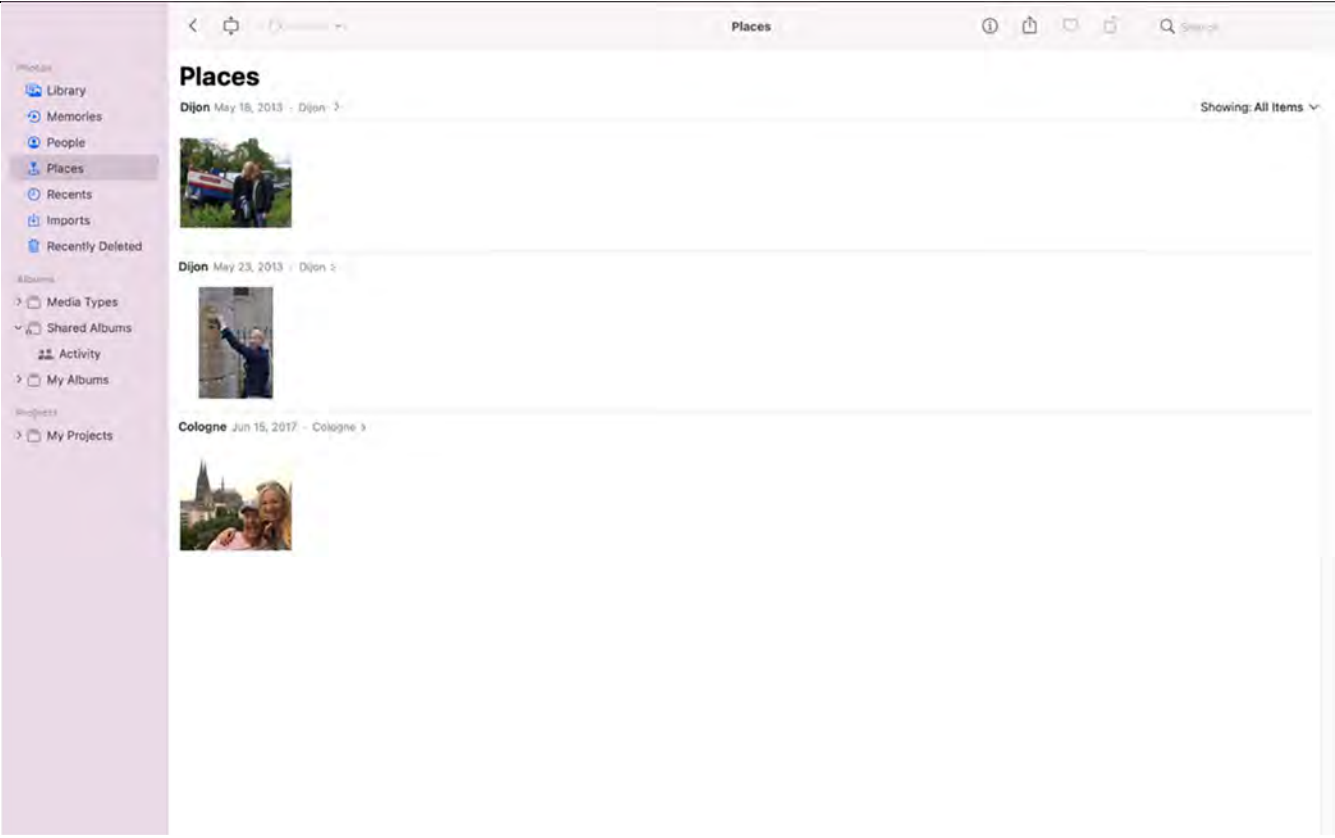
The third indication is associated with a third set of digital files and the third location.

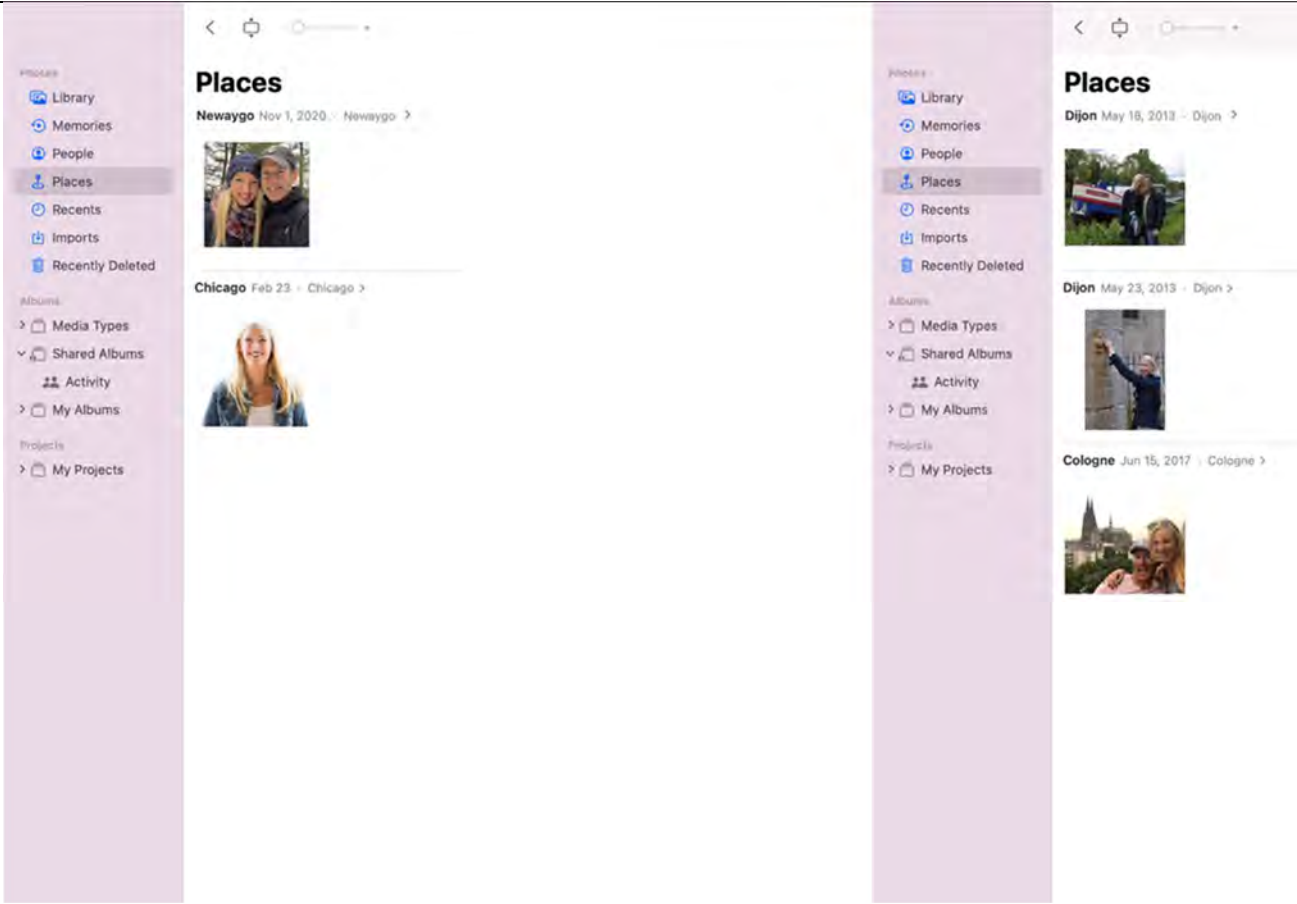
indication is associated with a fourth set of digital files and the fourth location.



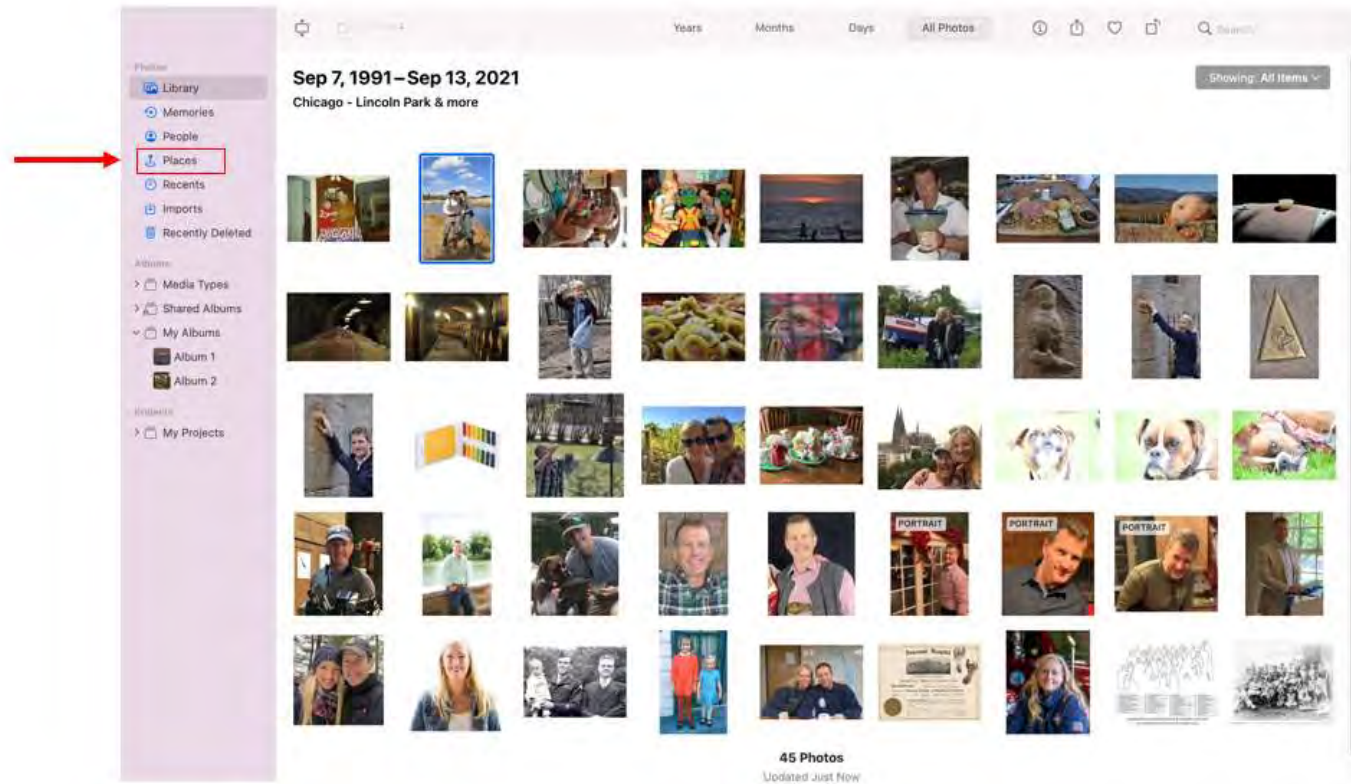
The fourth indication is associated with a fourth set of digital files and the fourth location.

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	 <p>The screenshot shows the 'Places' section of the macOS Photos app. On the left is a sidebar with navigation options: Library, Memories, People, Places (selected), Recents, Imports, Recently Deleted, Albums (Media Types, Shared Albums, Activity, My Albums), and My Projects. The main area displays three photo albums, each with a representative image and a date/location: 'Dijon May 18, 2013 - Dijon', 'Dijon May 23, 2013 - Dijon', and 'Cologne Jun 15, 2017 - Cologne'. The images show a person in various settings, including outdoors and indoors.</p>
<p><b>48.</b> The method of claim 47, wherein the third set of digital files and the fourth set of digital files are associated with the second person.</p>	<p>The third set of digital files and the fourth set of digital files are associated with the second person. As shown below, the second person is included in photographs in the third and fourth sets of digital files.</p>

	
<p><b>49.</b> The method of claim 31, further comprising receiving one or more filtering criteria and causing one or</p>	<p>macOS receives one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, macOS provides filtering criteria based on places (e.g., Chicago).</p>

more digital files to be displayed on the interface based at least in part on the one or more filtering criteria.



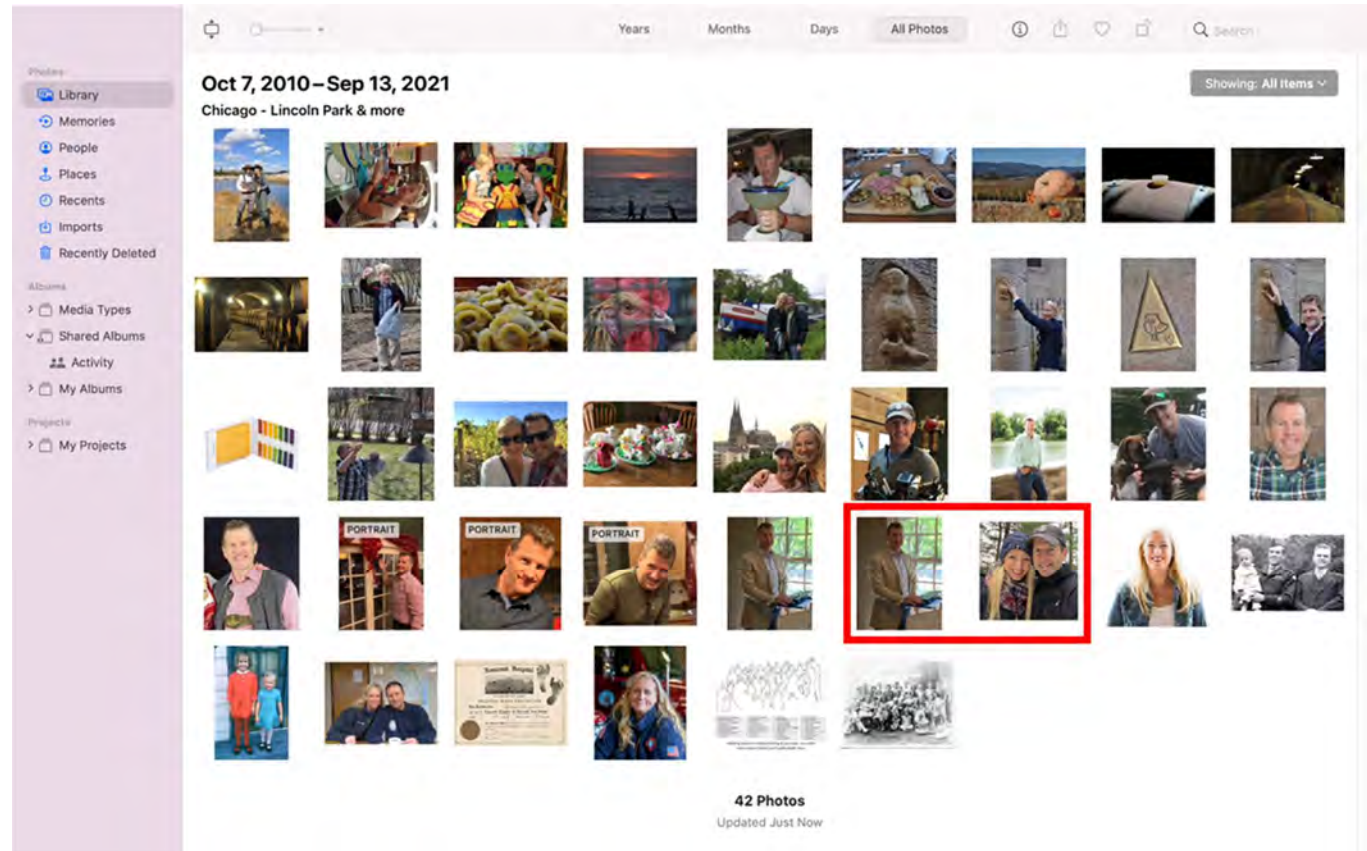
Further, macOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing just the letter “a” as a filtering criterion causes digital files to be displayed based on locations or months starting with the letter “a.”

	<p>The filtering criteria discussed above are exemplary and it should be understood that macOS may receive many different filtering criteria.</p>
<p><b>50[pre]</b> The method of claim 49, further comprising:</p>	<p>See information for claim 49.</p>



50[a] causing a second plurality of images to be displayed on the interface;

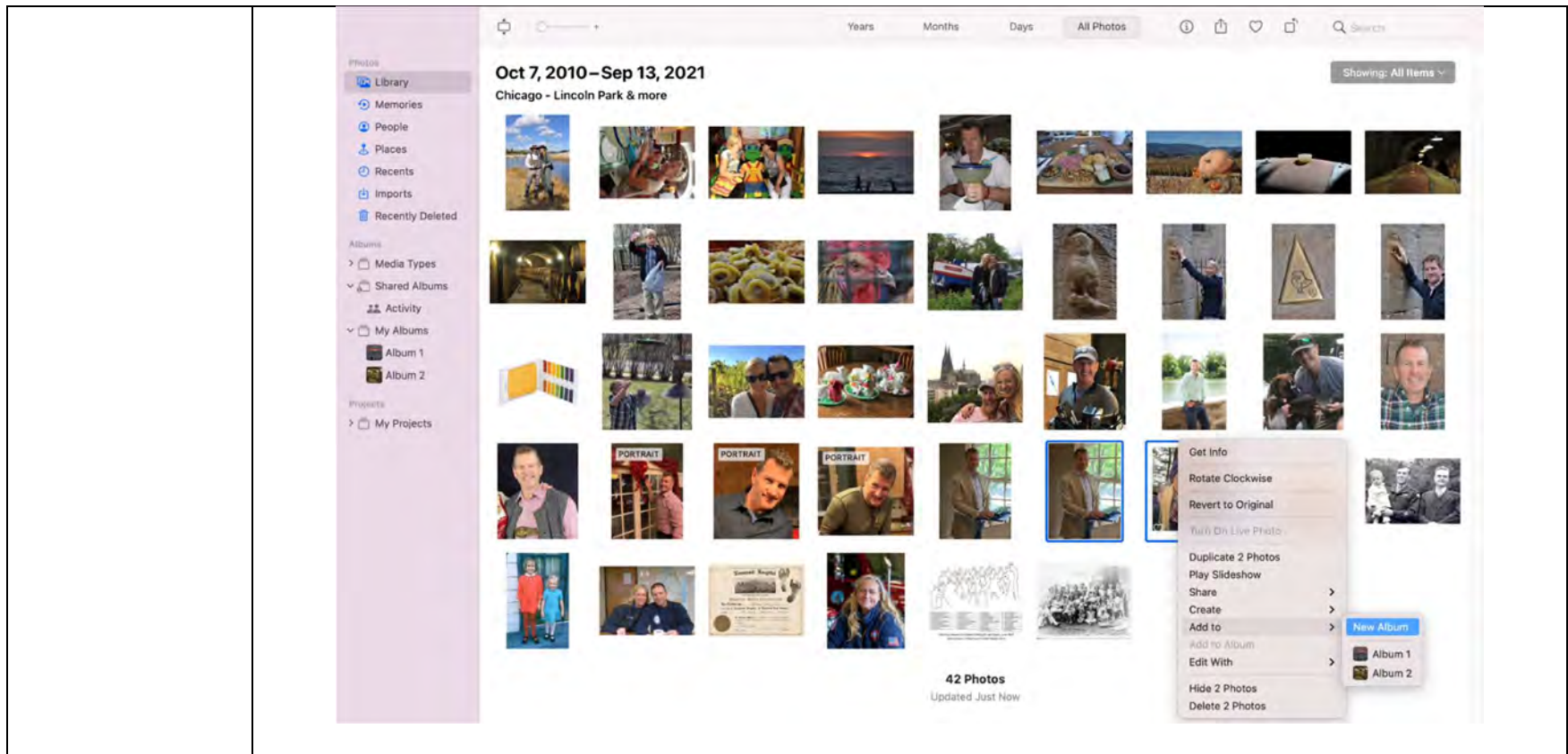
macOS causes a plurality of images to be displayed on the interface.



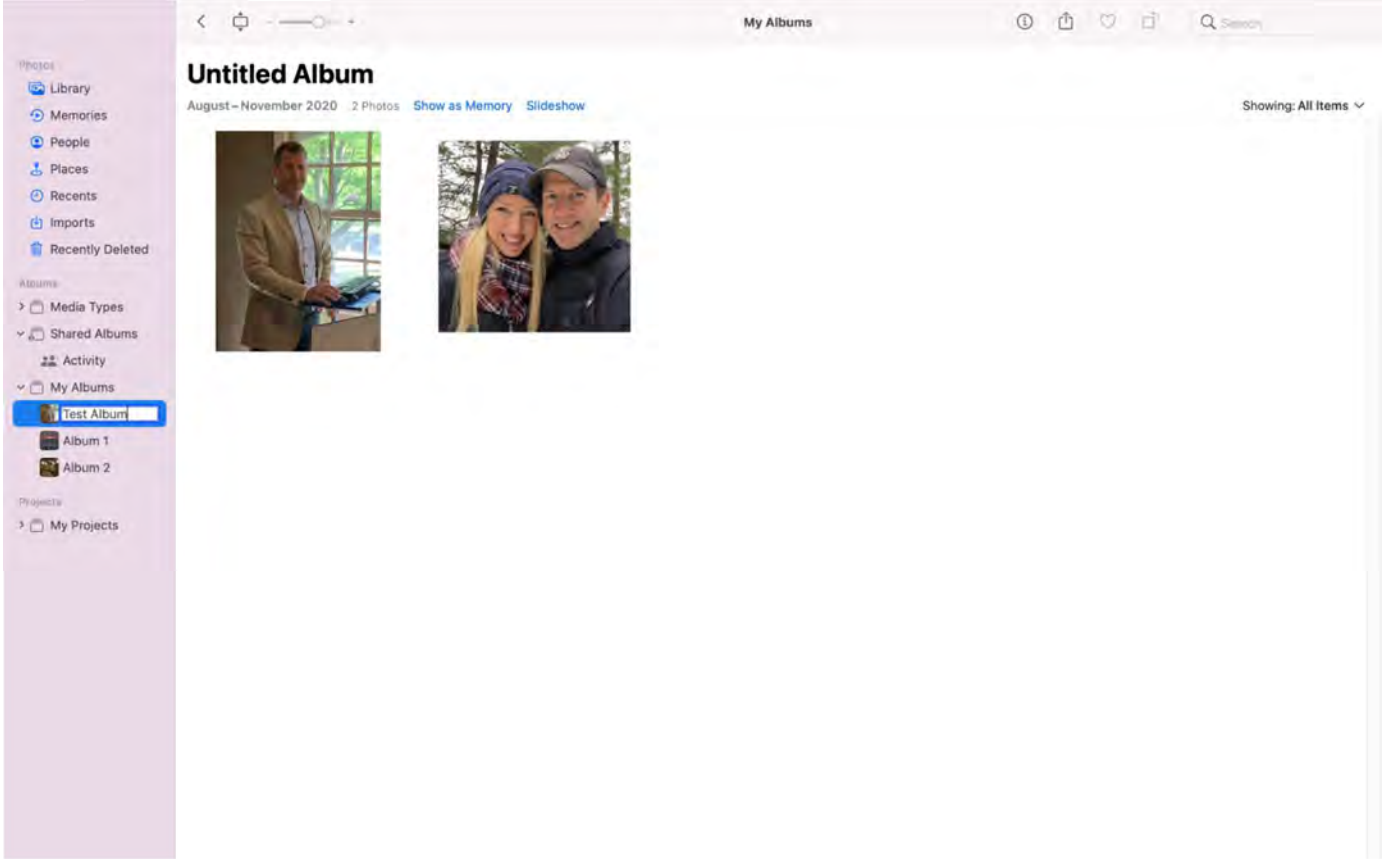
50[b] receiving alphanumeric text as the album name;

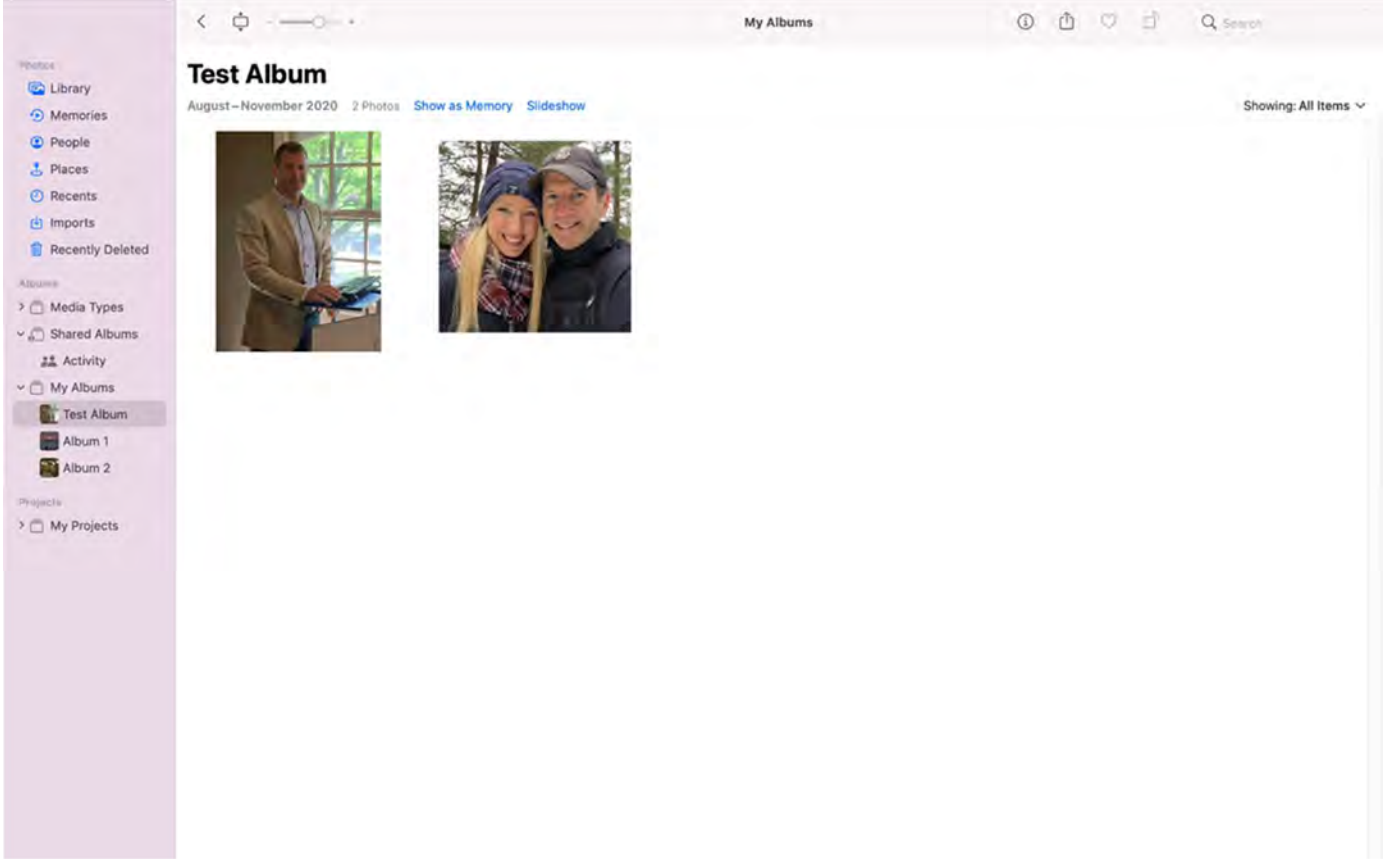
macOS receives alphanumeric text as the album name

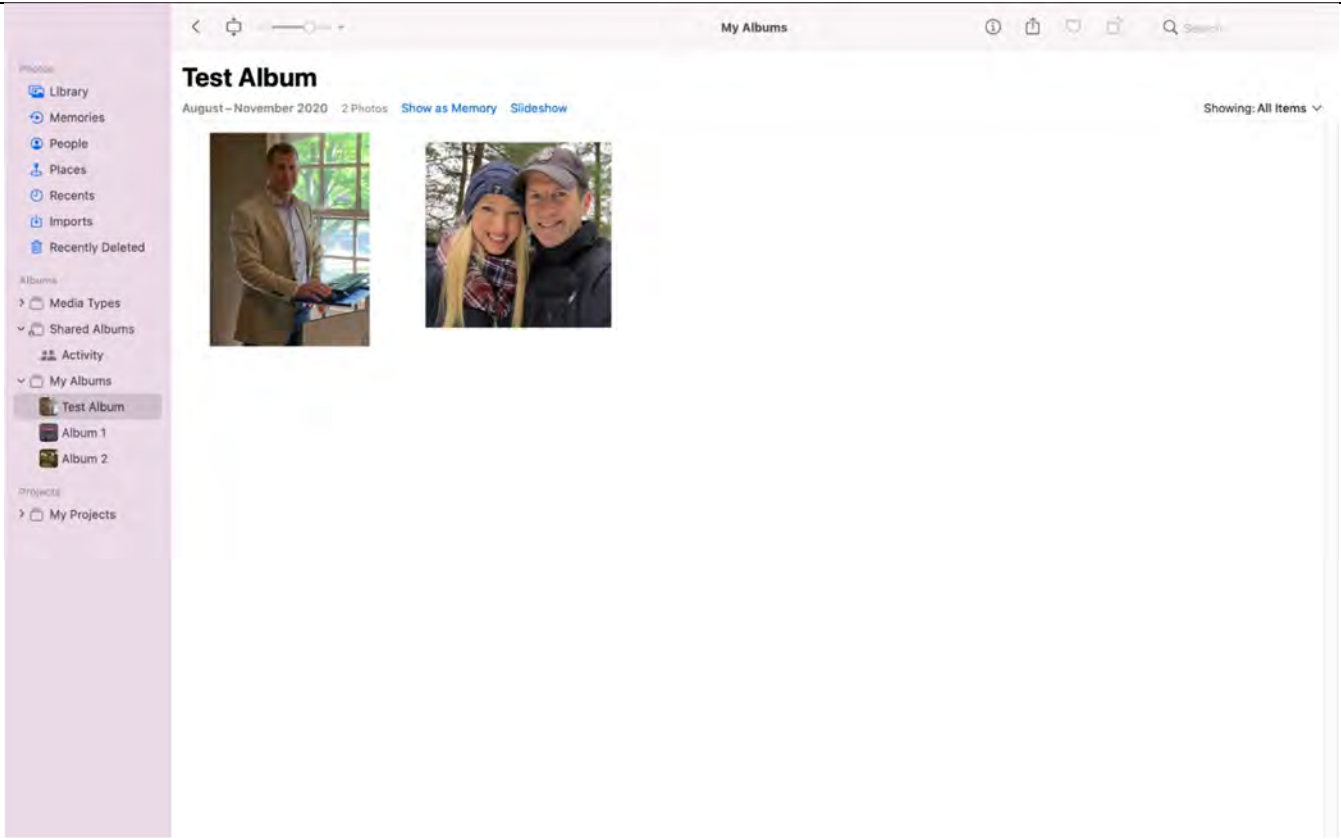
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



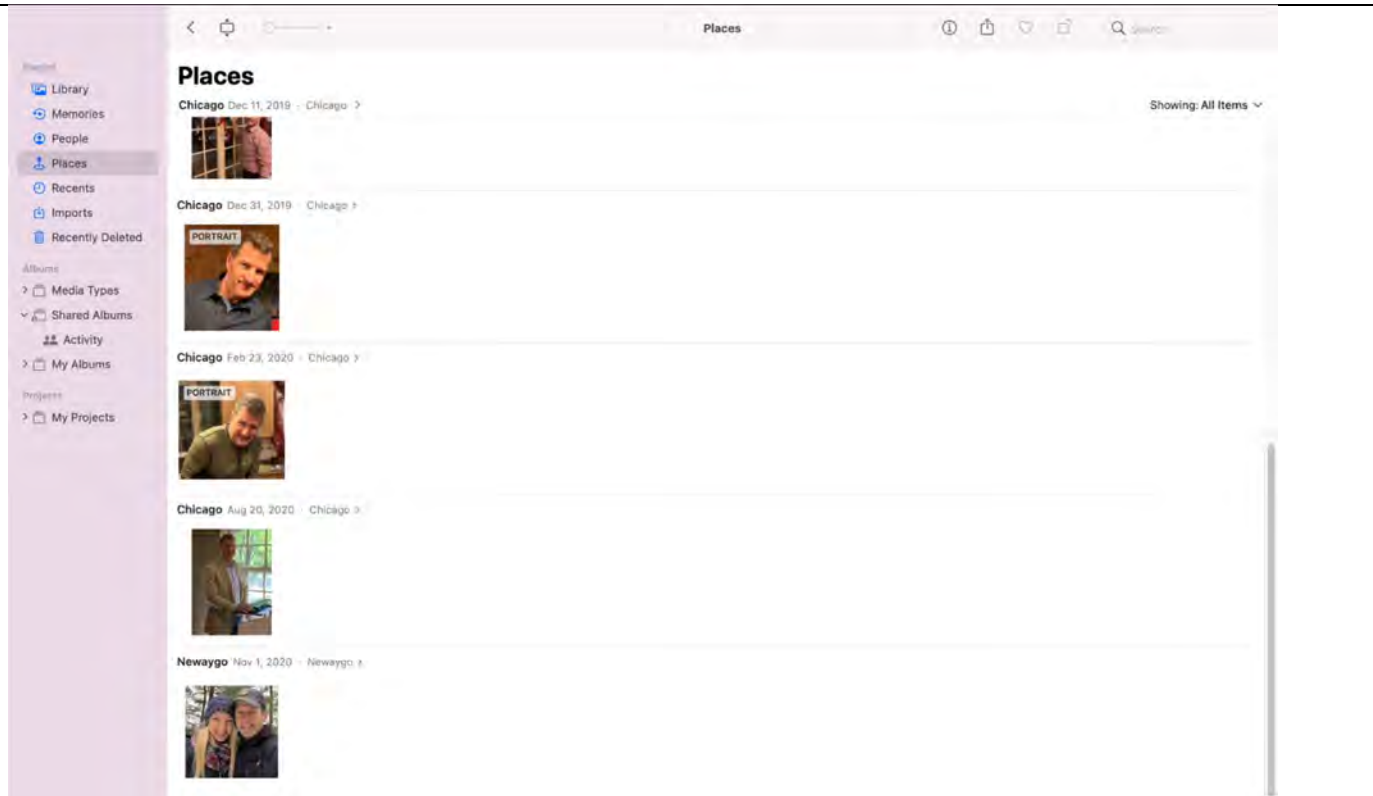
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with categories: PHOTOS (Library, Memories, People, Places, Recents, Imports, Recently Deleted), ALBUMS (Media Types, Shared Albums, Activity, My Albums), and PROJECTS (My Projects). Under 'My Albums', 'Test Album' is selected and highlighted in blue. The main window displays an album titled 'Untitled Album' for the period 'August - November 2020' containing '2 Photos'. Two photos are visible: a man in a suit and a couple in winter gear. The top right of the window shows 'My Albums' and a search bar.</p>
<p><b>50[c]</b> causing each of the second plurality of images to be associated with an album name; and</p>	<p>macOS causes each of the plurality of images to be associated with an album name. For example, as shown below, each of the plurality of images are displayed with the album name.</p>

	 <p>The screenshot displays the macOS Photos application interface. On the left is a vertical sidebar with categories: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The 'My Albums' section is expanded, showing 'Test Album' selected. The main content area is titled 'Test Album' and shows two photos: a man in a suit and a couple. The interface includes a top navigation bar with 'My Albums', search, and share icons, and a bottom status bar with 'Showing: All Items'.</p>
<p>50[d] causing an album view to be displayed on the interface, the album view including the album name and the second</p>	<p>macOS causes an album view to be displayed on the interface, the album view including the album name and the plurality of images.</p>

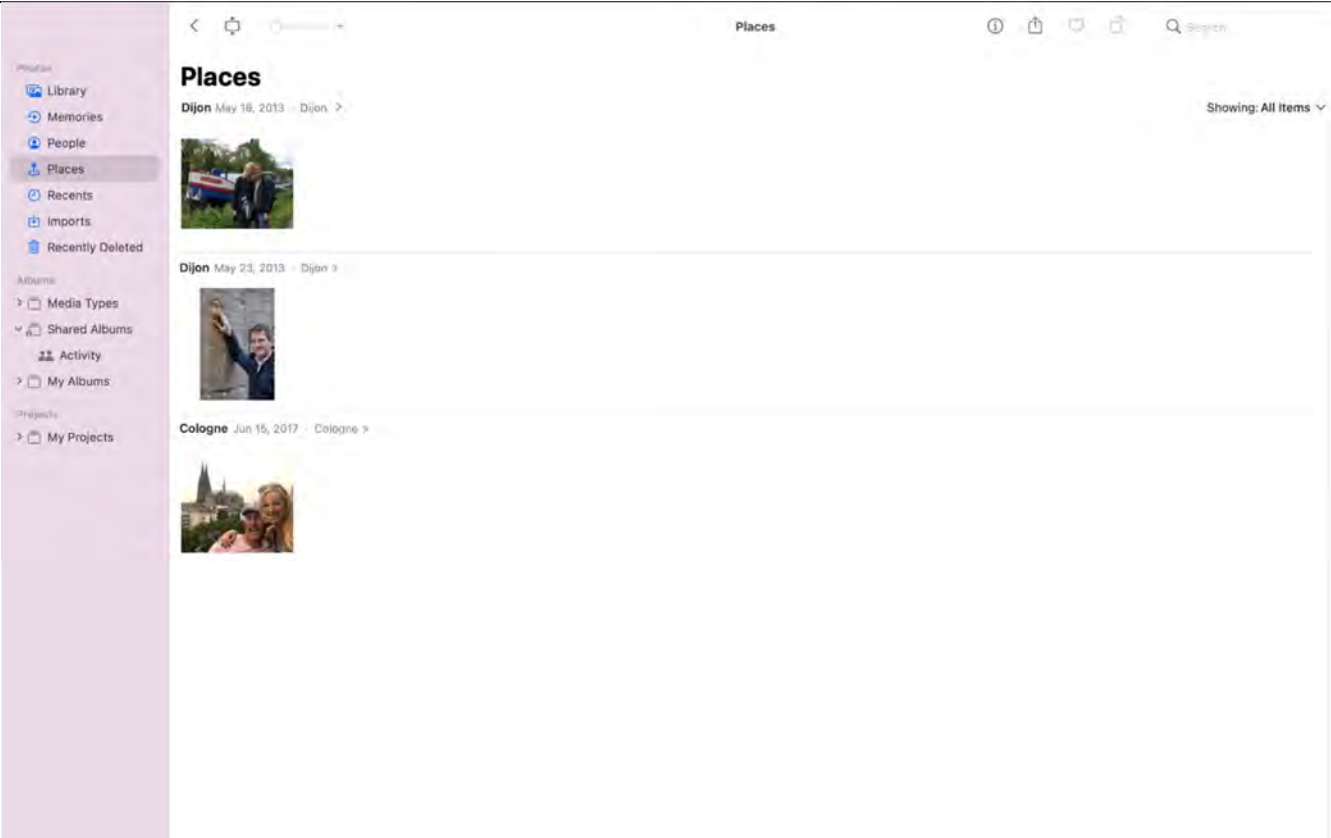
<p>plurality of images.</p>	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with categories: PHOTOS (Library, Memories, People, Places, Recents, Imports, Recently Deleted), ALBUMS (Media Types, Shared Albums, Activity, My Albums), and PROJECTS (My Projects). Under 'My Albums', 'Test Album' is selected. The main view shows the 'Test Album' with two photos: a man in a suit and a couple outdoors. The album title 'Test Album' and date range 'August - November 2020' are visible at the top of the main view.</p>
<p><b>51.</b> The method of claim 32, further comprising responsive to a selection associated with the first location, causing the first set of digital files to be displayed on the interface.</p>	<p>Responsive to a selection associated with the first location (e.g., responsive to a click of the first indication in the first location view) causing the first set of digital files to be displayed on the interface.</p>

to be displayed on the interface and responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.



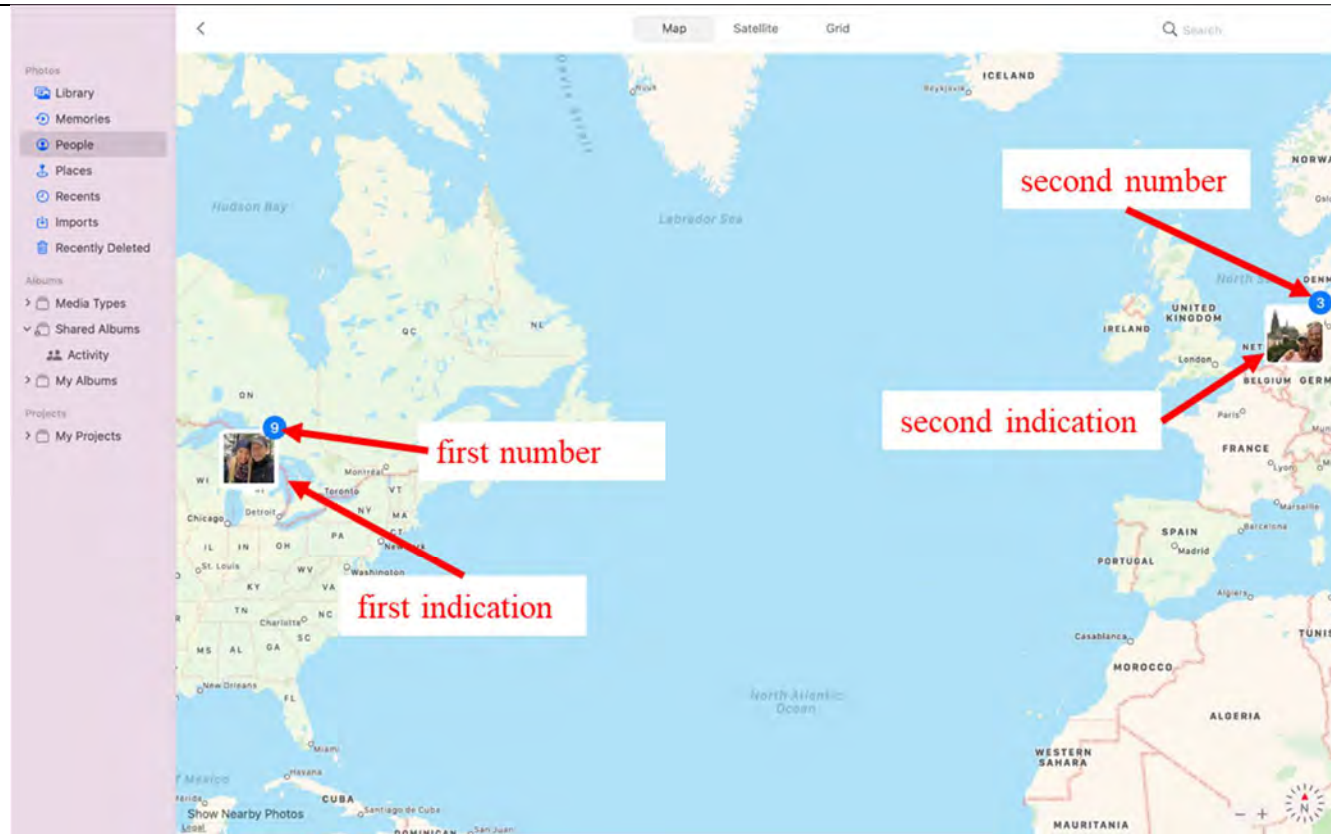
Responsive to a selection associated with the second location (e.g., responsive to a click of the second indication in the first location view) causing the first set of digital files to be displayed on the interface.



	
<p><b>52.</b> The method of claim 51, further comprising causing (i) a first number associated with a number of digital files in the first set of digital files to be</p>	<p>macOS displays (i) a first number associated with a number of digital files in the first set of digital files to be displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files on the interface.</p>

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

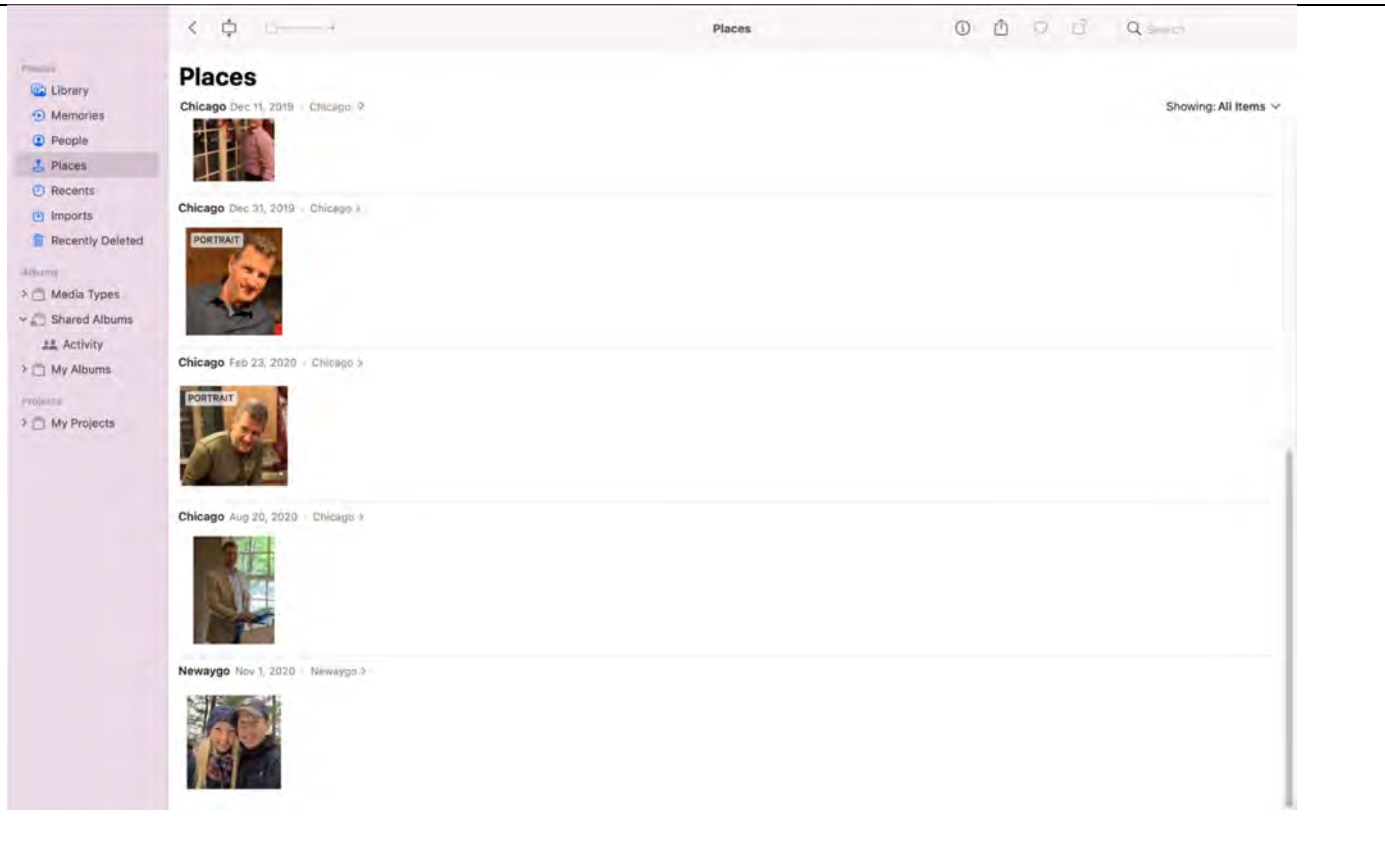
displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.



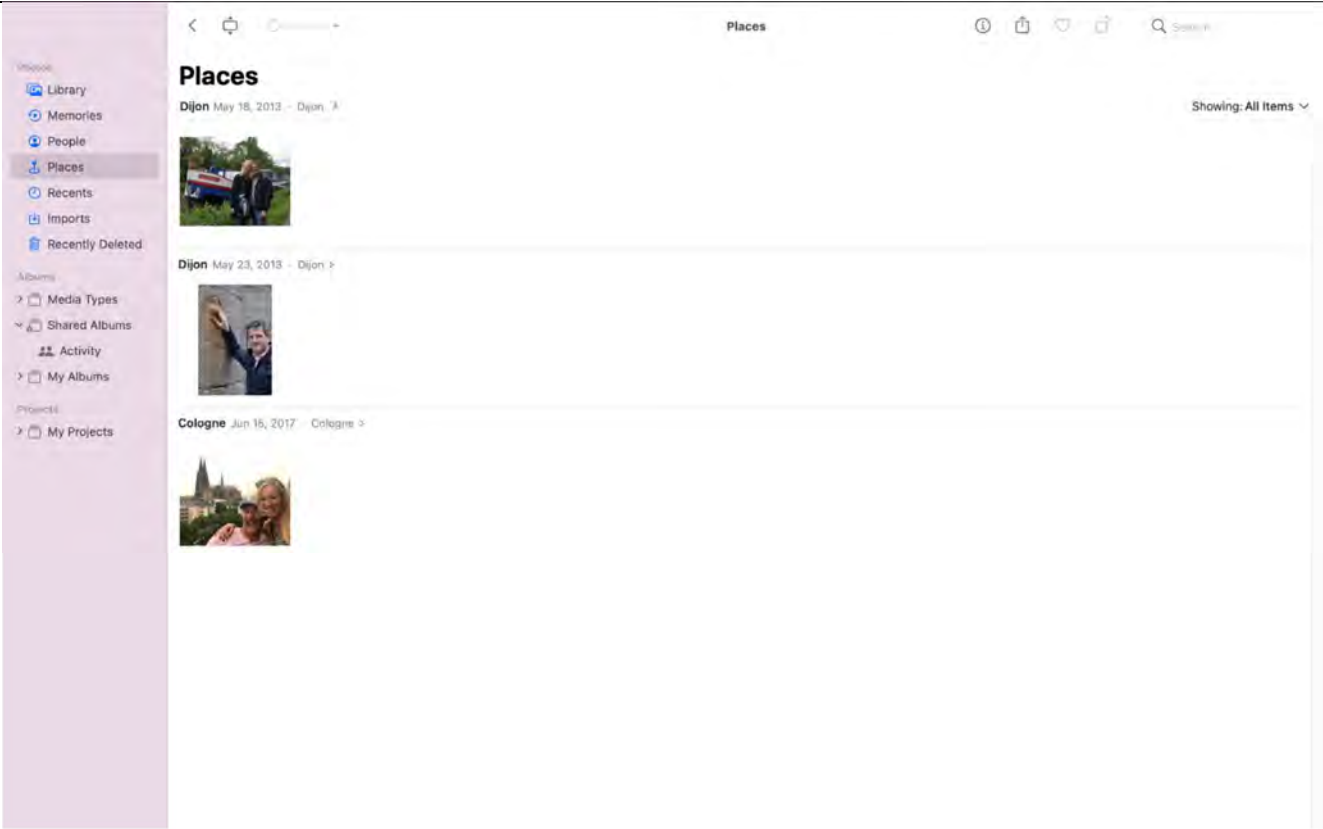
**53.** The method of claim 33, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files

Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

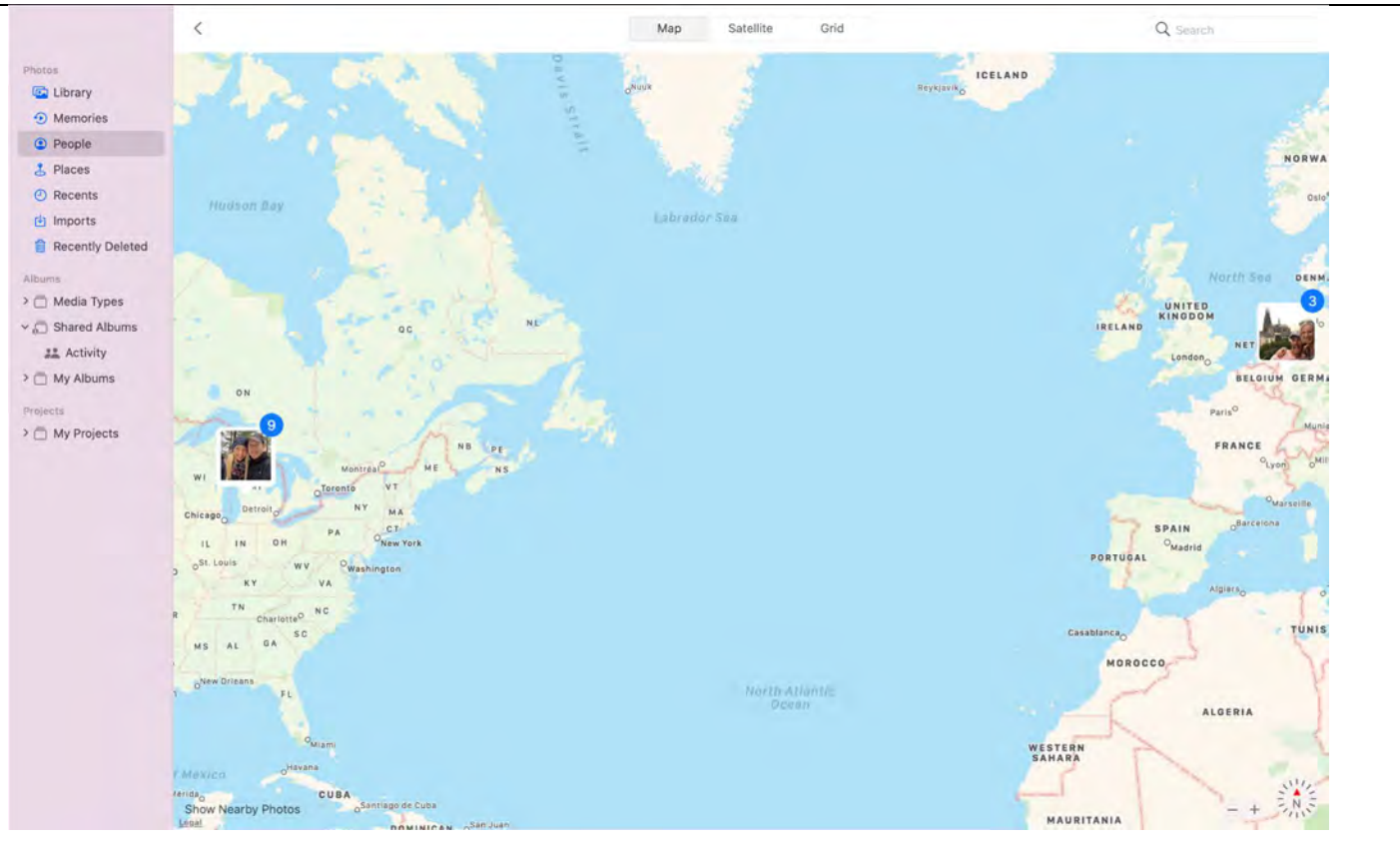
include a photo, a video, or both.

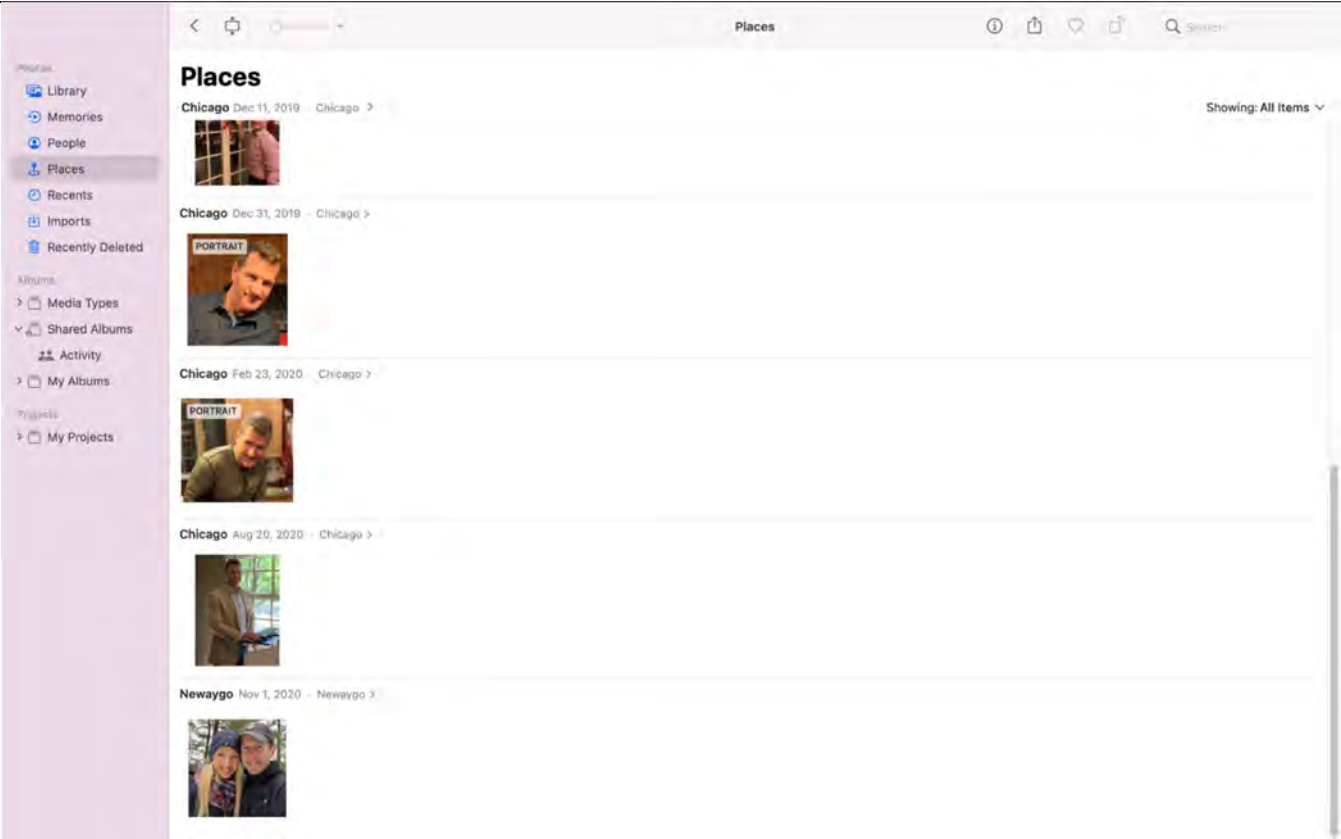


Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

	
<p><b>55[pre]</b> The method of claim 51, wherein</p>	<p><i>See information for claim 51.</i></p>
<p><b>55[a]</b> the first set of digital files displayed on the interface responsive to the selection</p>	<p>Each of the digital files in the first set of digital files displayed on the interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map.</p>

associated with the first location are not overlaid on the interactive geographic map and

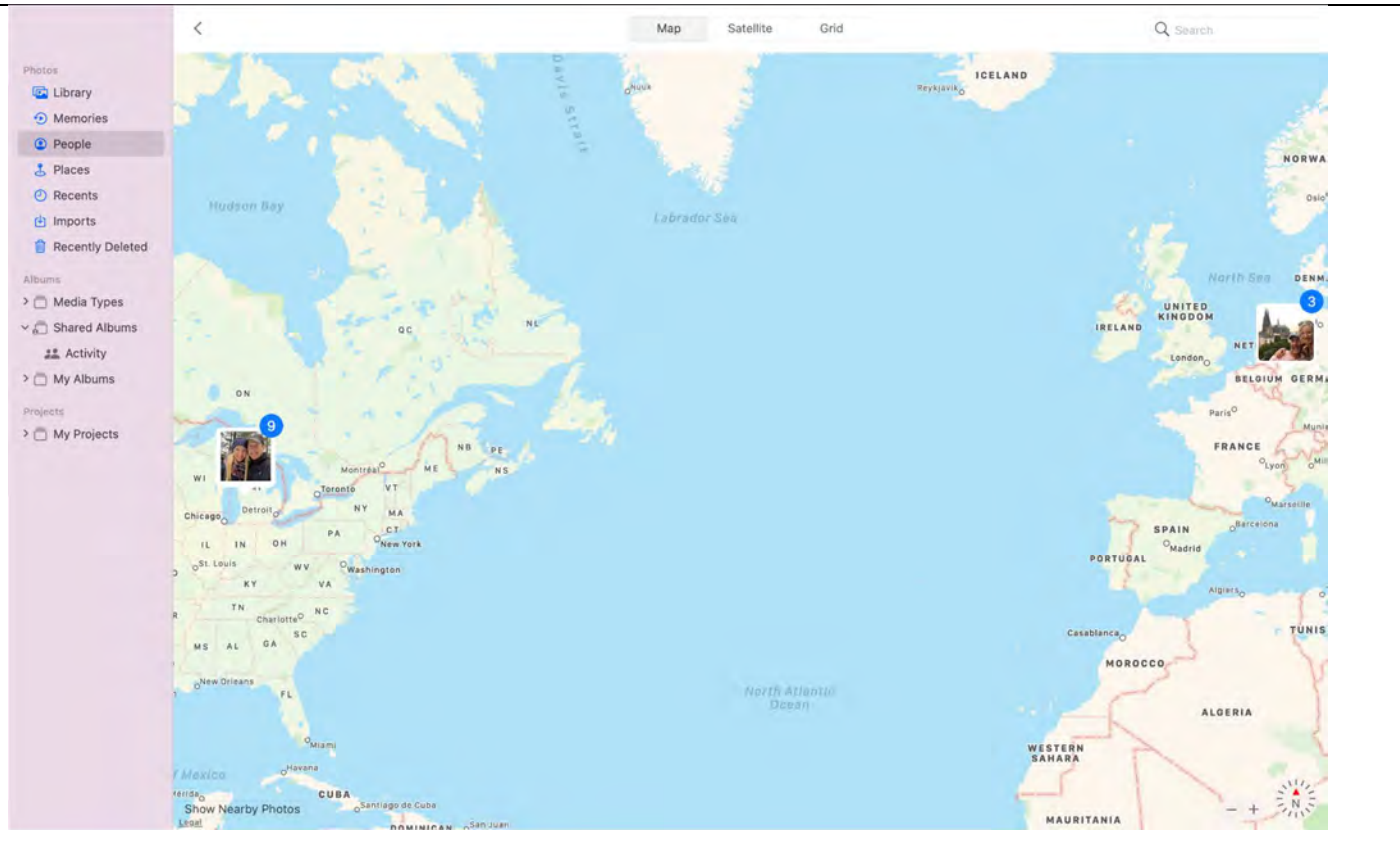


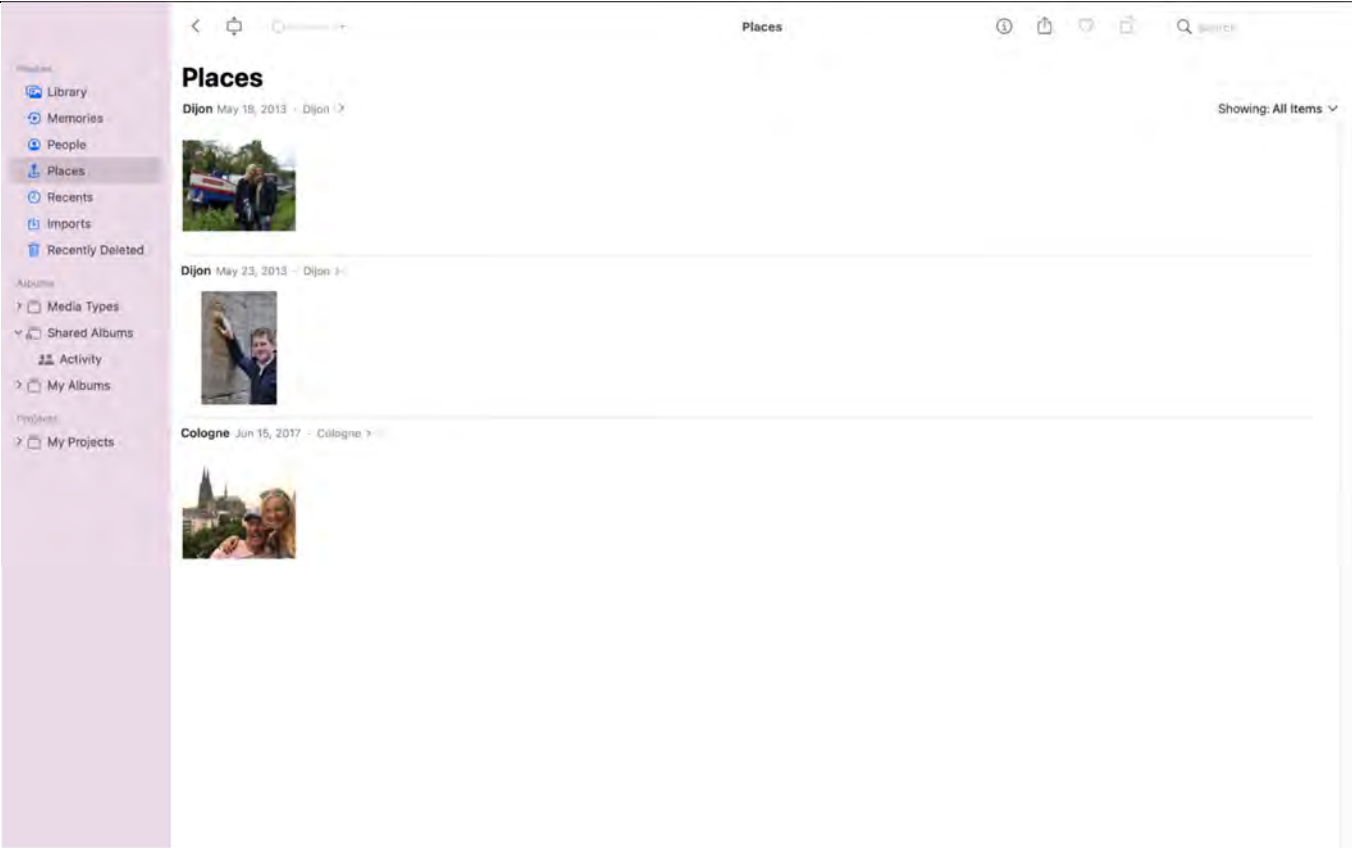
	
<p><b>55[b]</b> the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on the interactive geographic map.</p>



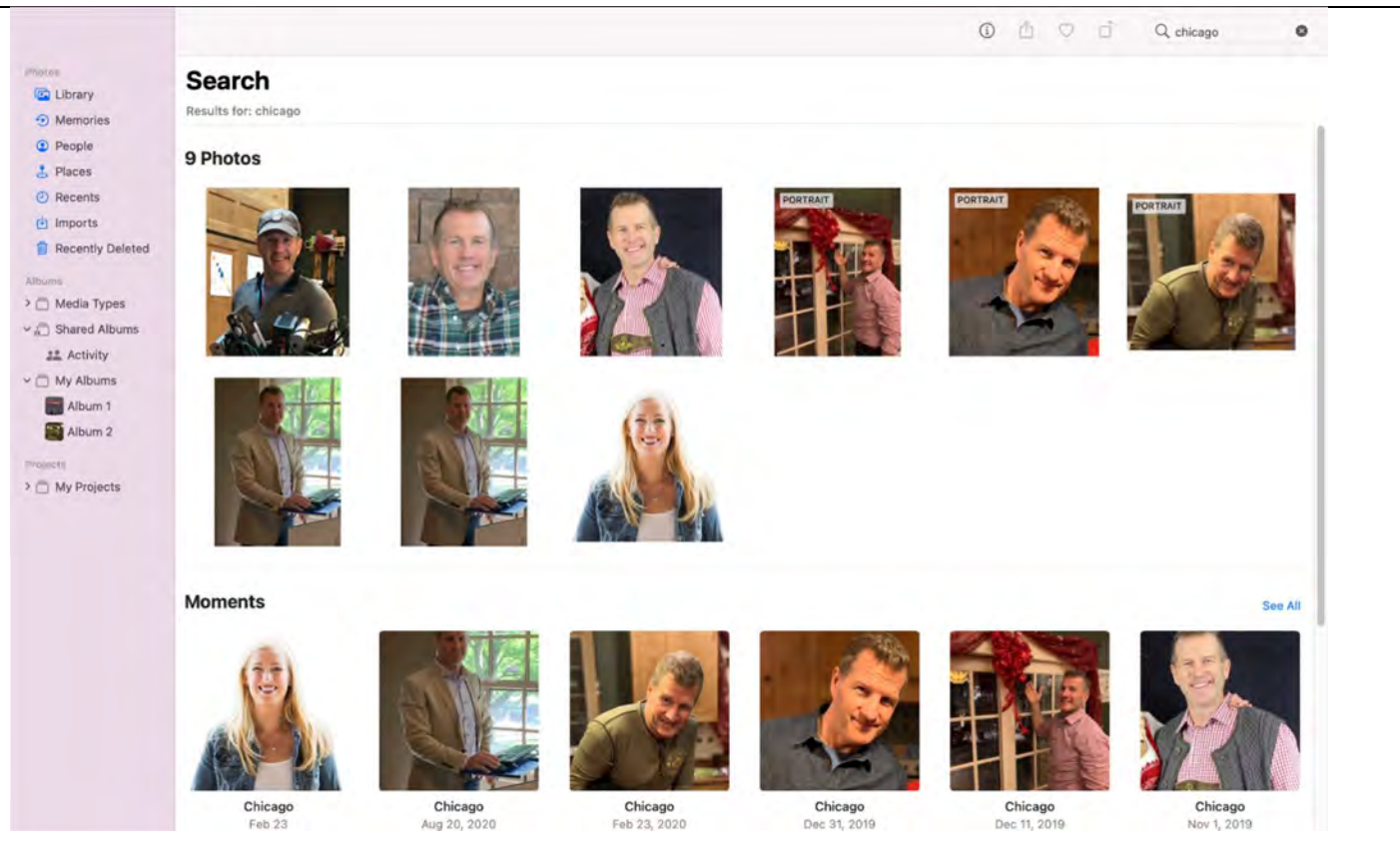
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

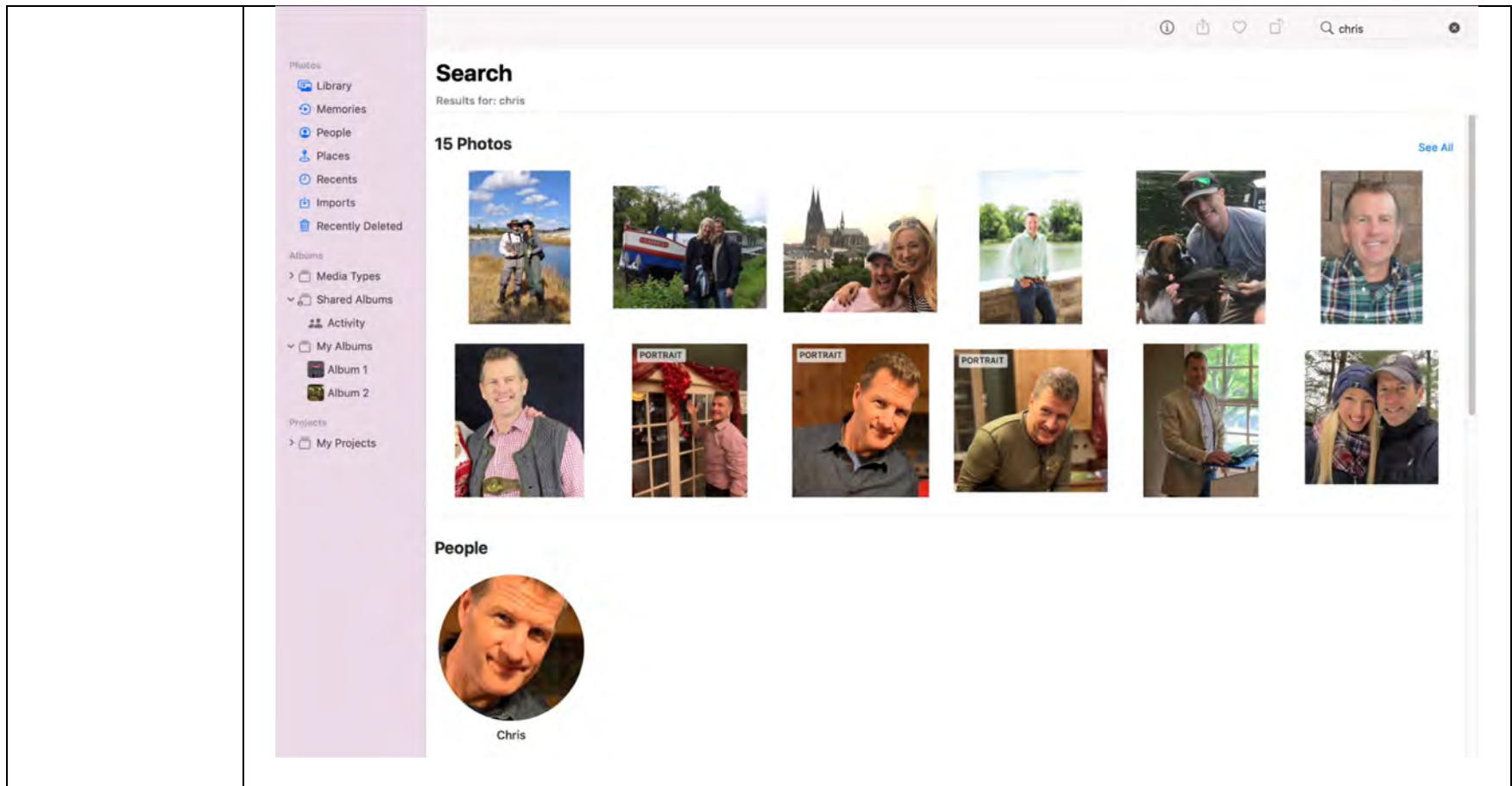
the interactive geographic map.

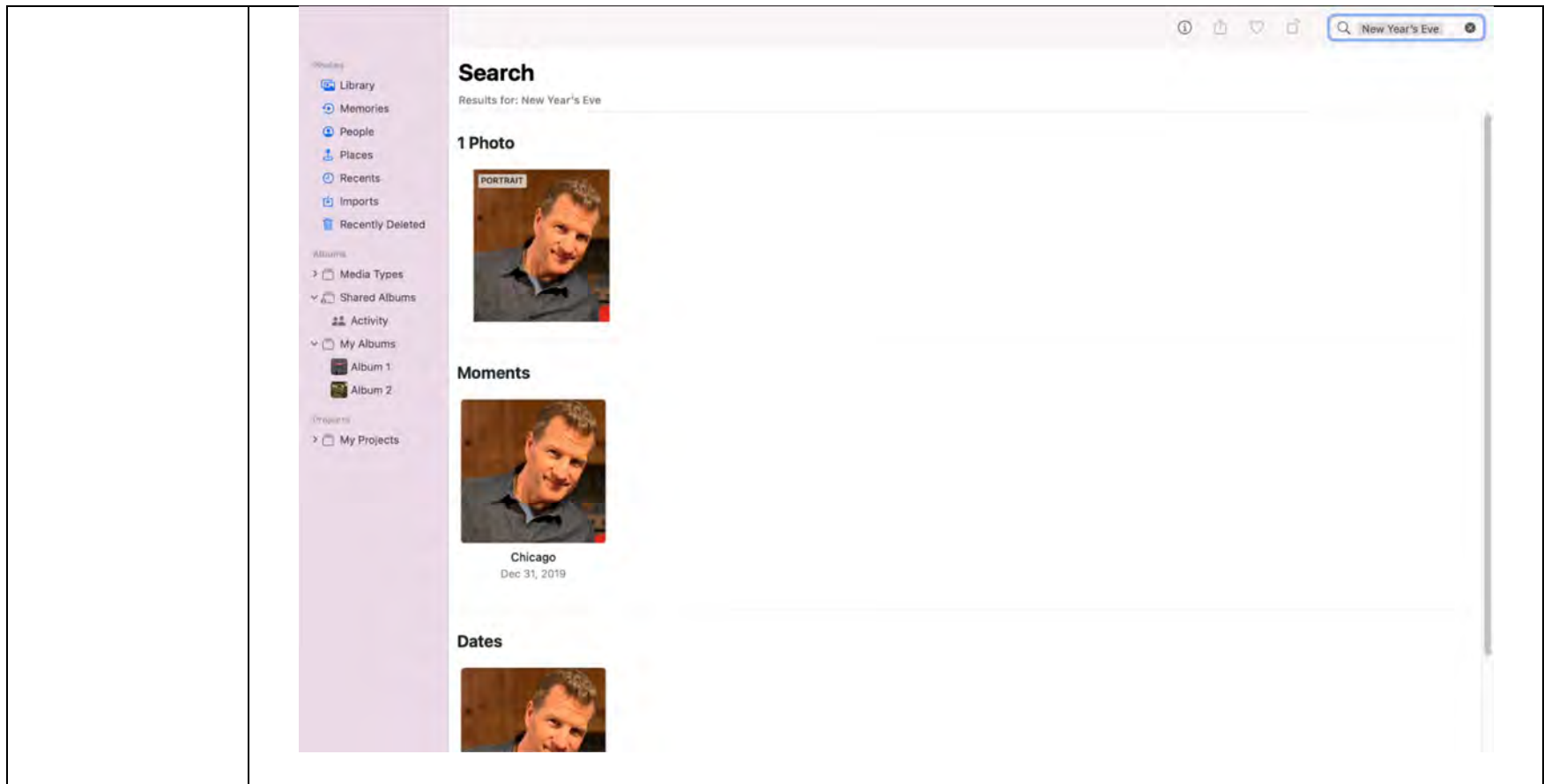


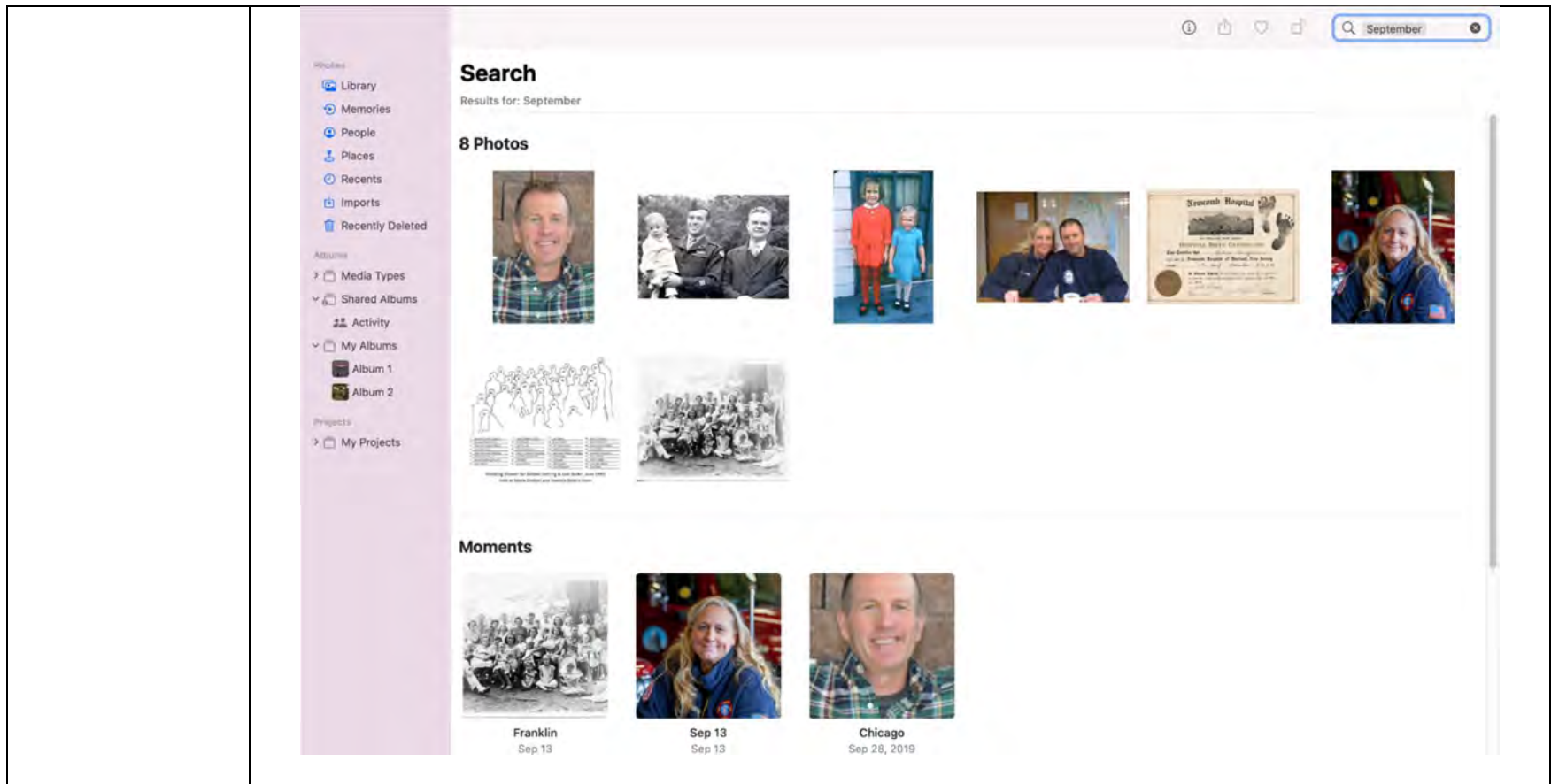
	
<p><b>56.</b> The method of claim 49, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>

combination thereof.

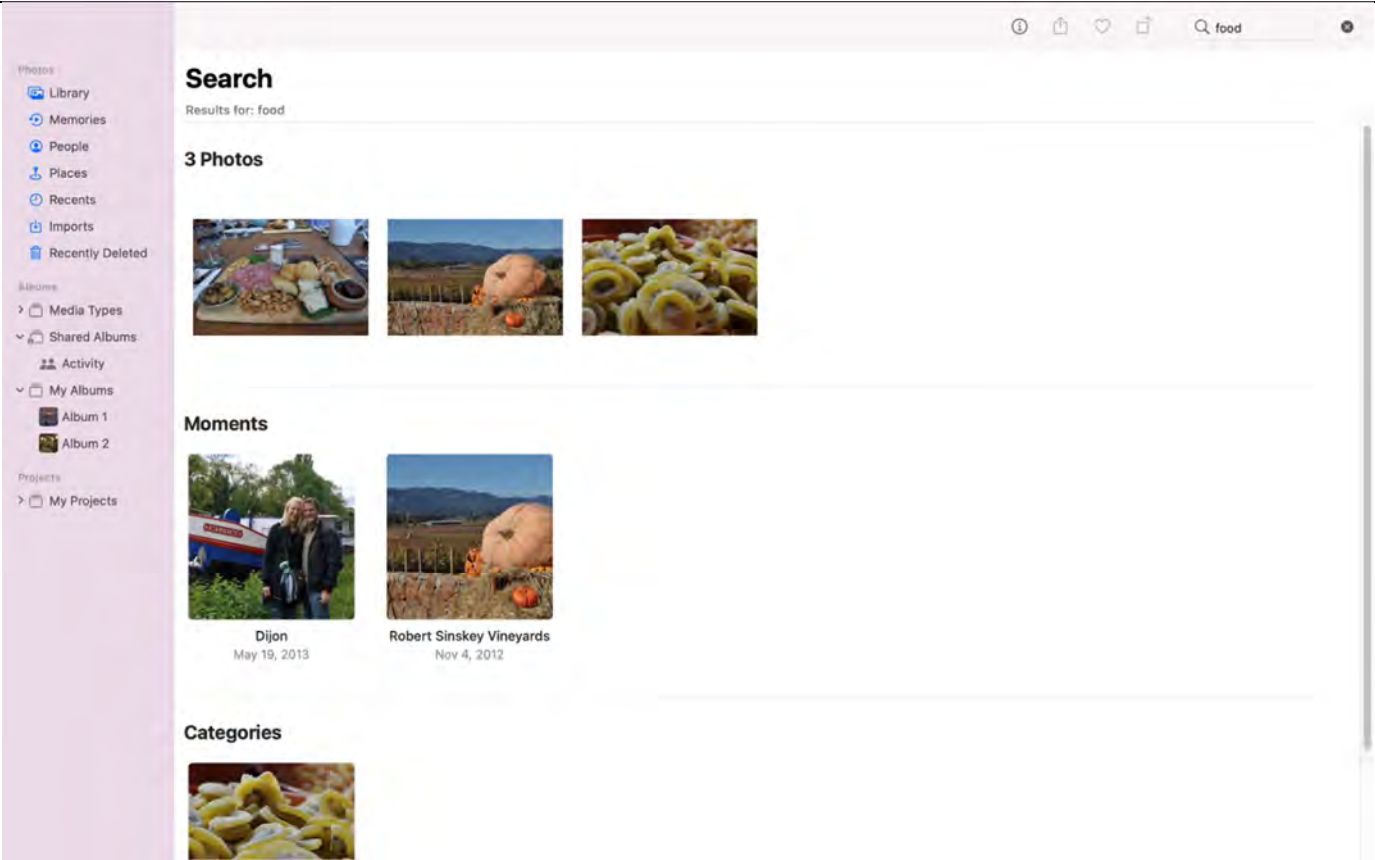




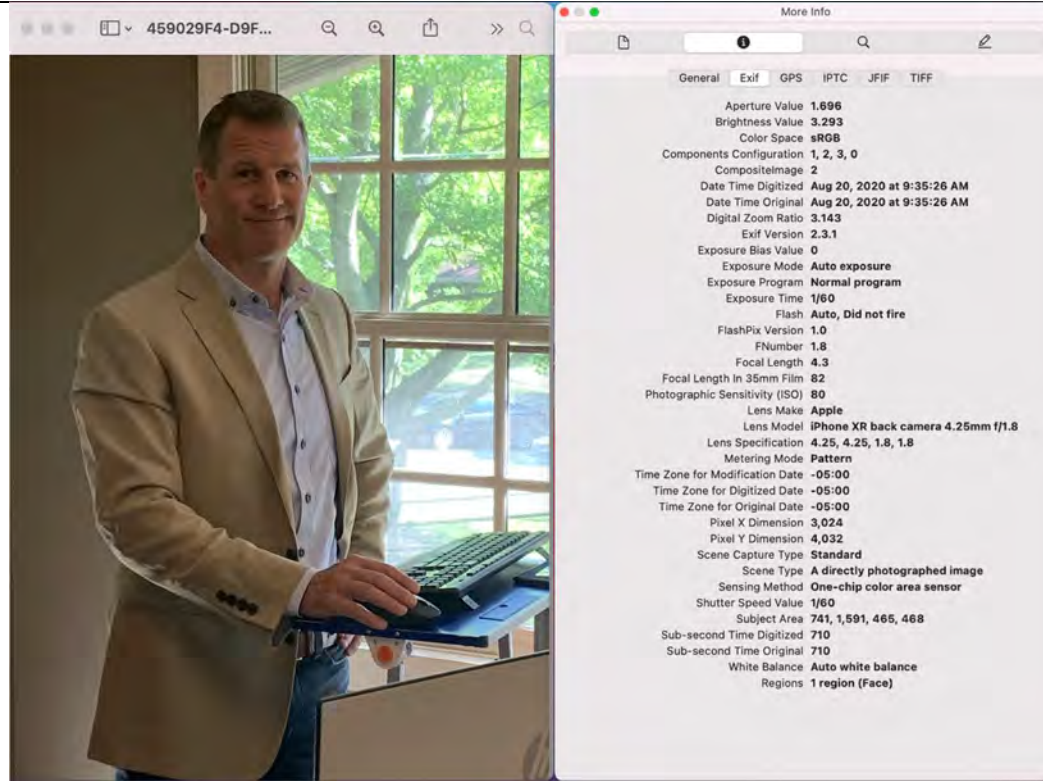






	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with navigation options: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The main area is titled 'Search' and shows 'Results for: food'. Under '3 Photos', there are three thumbnails: a plate of food, a pumpkin in a field, and a close-up of yellow food. Below these are 'Moments' with two thumbnails: 'Dijon' (May 19, 2013) and 'Robert Sinskey Vineyards' (Nov 4, 2012). At the bottom, there is a 'Categories' section with one thumbnail of yellow food.</p>
<p><b>57.</b> The method of claim 42, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data</p>	<p>exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file. This is evidenced by, for example, exporting the first digital file to another device (e.g., an iPhone using AirDrop), then exporting the same first digital file back to macOS, which the EXIF data is clearly visible.</p>

associated with the first digital file.



**58.** The method of claim 31, wherein the input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image

The input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image associated with the first person. *See* information for limitation 31[b].

Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

associated with the first person.	
<b>59.</b> The method of claim 31, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.	The input that is indicative of the selection of the first map image is a touch or click of the first map image. <i>See</i> information for limitation 31[c].